

BEFORE THE ALABAMA COURT OF THE JUDICIARY

IN THE MATTER OF:

STATE OF ALABAMA JUDICIAL INQUIRY
COMMISSION

V.

THE HONORABLE TRACIE A. TODD
CIRCUIT JUDGE, BIRMINGHAM DIVISION,
CRIMINAL DIVISION, JEFFERSON COUNTY, ALABAMA

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FILED

JUL - 2 2021

COURT OF THE JUDICIARY

Rebecca C. Oates

Secretary

Case # 58

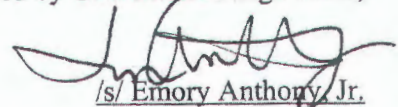
ANSWER

Judge Todd denies each allegation of the complaint alleging violations of the Canons of Judicial Ethics and demands strict proof thereof. Additionally, Judge Todd avers the following affirmative defenses:

AFFIRMATIVE DEFENSES

1. Statute of limitations;
2. Theory of Condonation;
3. Doctrine of Laches and Equity;
4. Doctrine of Unclean Hands;
5. Commission proceedings commenced on unverified complaint in violation of RPJIC Rule 6; and
6. Michael Anderton, the undersigned affiant, was not the proper party to initiate Commission proceedings.

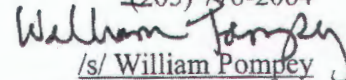
Respectfully submitted by Counsel for Judge Todd,



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