

MICHAEL K. JEANES
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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

JODI ANN ARIAS,

Plaintiff,

v.

LAURENCE K. NURMI and
CHRISTLYN BETH NURMI,
Husband and Wife,

Defendants.

CASE NO.: CV 2017-014091

COMPLAINT

(Breach of Fiduciary Duty;
Constructive Trust; Unjust
Enrichment)

THE PARTIES, JURISDICTION, AND VENUE

1. Plaintiff was at all relevant times incarcerated in Maricopa County, Arizona.
2. Defendant, Laurence K. Nurmi was at relevant times an attorney licensed to practice law in Arizona with his principal place of business in Maricopa County, Arizona.
3. Defendant Laurence K. Nurmi and Defendant Christlyn Beth Nurmi are husband and wife who at relevant times resided in Maricopa County, Arizona.

1 4. All acts alleged herein were done for and on behalf of the marital
2 community.

3
4 5. All acts and matters alleged herein originated in Maricopa County, Arizona.

5 6. The parties and the amount in controversy are within the jurisdiction of this
6 court.

7 7. Venue is proper in the Superior Court for Maricopa County, Arizona.
8

9 **GENERAL ALLEGATIONS**

10 8. As a member of the State Bar of Arizona licensed to practice law in
11 Arizona, Laurence K. Nurmi (Nurmi) is and was subject to the ethical rules and
12 fiduciary obligations applicable to all lawyers in Arizona.

13
14 9. This action arises out of Nurmi's representation of Plaintiff, and specifically
15 with respect to the litigation captioned, State of Arizona v. Jodi Ann Arias, CR
16 2008-031021, in the Superior Court of the State of Arizona in and for the County
17 of Maricopa.

18
19 10. Nurmi represented Plaintiff against a charge of capital murder involving the
20 death of Travis Alexander.

21 11. Because Plaintiff was determined to be indigent by the court, she was
22 appointed counsel at taxpayer expense.

23
24 12. From the beginning, the state indicated its intention to seek the death
25 penalty.

1 13. All capital cases in Arizona are assigned two attorneys: one who acts as
2 "first chair" and another who serves as "second chair". In addition to the two
3 attorneys, capital defendants are also assigned several other people to work as part
4 of the "defense team", including a mitigation specialist.

6 14. The roles of the defense team are decided at the outset of the case. The first
7 chair is in charge of the defense team, and makes all final decisions on the case.
8 The first chair usually focuses their work on investigating and defending what is
9 known as the "guilt phase" of the case - which involves defending the client
10 during the evidentiary trial of the state's case.

12 15. In Arizona, if the defendant is found guilty of first degree murder and
13 determined to be eligible for the death penalty, the trial proceeds to the penalty
14 phase.

16 16. It is the role of the second chair, working with the mitigation specialist, to
17 investigate and prepare mitigation to present to the jury in the penalty phase of the
18 case.

20 17. In Arizona it is the jury who decides what sentence the defendant receives
21 and therefore whether they are going to be put to death.

22 18. Plaintiff's case was originally assigned to the Maricopa County Legal
23 Defender's Office. Attorney Maria Schaffer was appointed as first chair, and
24 Gregory Parzych as second chair. Gwen Fehnel was the mitigation specialist.
25

1 19. The Legal Defender's Office withdrew from the case. The case was then
2 reassigned to the Maricopa County Public Defender's Office, where Nurmi
3 worked. Nurmi was assigned as "first chair" on Plaintiff's case in August 2009.
4 Attorney Victoria Washington was appointed as second chair. Sue Stodola was
5 the mitigation specialist.
6

7 20. The Maricopa County Public Defender's Office withdrew due to a conflict.
8 By that time Nurmi had left the office and gone into private practice so he didn't
9 have the conflict. The court ordered that he keep the case, and appointed Jennifer
10 Willmott, a defense attorney who works on contract with the county, as second
11 chair. Maria De La Rosa was appointed as the mitigation specialist. This is the
12 defense team that represented Plaintiff throughout the rest of the case.
13
14

15 21. In November 2015, Nurmi published a book he wrote entitled *Trapped with*
16 *Ms. Arias, Part 1 of 3 From Getting the File to Being Ready for Trial* (the book).
17

18 22. In the book Nurmi discloses confidential and privileged information
19 regarding his representation of Plaintiff for the expressed purpose of financial gain
20 and his own public "redemption".
21

22 23. Since his representation of Plaintiff ended Nurmi has made numerous
23 public statements about his client via traditional media (including on television,
24 radio, in print, etc.) as well as via the internet and on social media for the purpose
25 of marketing the book and increasing sales.

1 24. Unauthorized disclosures by Nurmi to persons outside his law firm of
2 confidential and/or privileged information described herein violated his ethical
3 and fiduciary duties to Plaintiff.
4

5 25. A preliminary research on the internet concerning Nurmi's public
6 statements about Plaintiff reveals numerous events wherein Nurmi disclosed
7 confidential and privileged information. Attached as Exhibit 1 is a list of several
8 such events. Exhibit 1 involves only a short time frame after he self-published his
9 first book. Upon information and belief there are a multitude of other similar
10 events occurring even as late as the filing of this Complaint.
11

12 26. Upon information and belief, Nurmi continues to sell the book and has
13 continued to engage in marketing efforts including traditional media and social
14 media.
15

16 **I. Nurmi's Book: "Trapped with Ms. Arias"**
17

18 27. Nurmi's express purpose in publishing the book is his own "redemption."
19 (Page xix)¹. He selfishly seeks to redeem his public image as a lawyer, which he
20 claims was tarnished by his representation of Plaintiff.
21

22 28. In the course of his quest to "redeem" himself with the public, Nurmi
23 discloses confidential information about his client, including privileged
24

25 ¹ Page references to Nurmi's book contained herein will follow this form.

1 communications, his mental impressions of the case and other work product
2 privileged information. He engages in a horrific public excoriation of his client,
3 Plaintiff (as well as others) so that his own public image can be "redeemed."
4

5 29. In the course of his selfish quest for public admiration for the way he
6 handled his client's case, Nurmi purposefully exposes Plaintiff's confidential
7 and/or privileged information. He also purposely insults, ridicules and berates her,
8 her family members, witnesses, co-counsel, opposing counsel and others for the
9 purpose of making money and his own redemption.
10

11 30. Nurmi states in his book that the trial court incorrectly ruled against many
12 of his substantive motions in the case. These adverse rulings – which are clearly
13 incorrect according to Nurmi – could result in Plaintiff receiving a new trial.
14 Nevertheless, Nurmi intentionally discloses confidential and/or privileged
15 information that would jeopardize her in a retrial, knowing that is a possibility.
16

17 31. Nurmi also knew that in any retrial, the State will most certainly seek the
18 death penalty.
19

20 32. The "Foreword" to the book (by his lawyer-colleague and friend Caroline
21 Aeed), the "Introduction" (by Nurmi) and many other references in the remainder
22 of the book, demonstrate that Nurmi contemplated writing his book during the
23 time he represented Plaintiff. Nurmi took steps to prepare for writing and
24 publishing it during that time.
25

1 33. Prior to the start of the first trial Nurmi told his then-co-counsel Ms.
2 Willmott that he wanted to write a book and asked if she would co-author it with
3 him.
4

5 34. On at least one or more occasions over the course of the case Nurmi asked
6 Plaintiff for her permission to write his book – and every time Plaintiff refused to
7 give him permission.
8

9 35. Nurmi wrote the book and published it knowing that would violate his most
10 basic ethical obligations to the client.

11 36. Nurmi told Ms. De La Rosa that writing the book would be like “winning
12 the lottery” and would be worth it even if he had to “turn my card in” – meaning
13 lose his license to practice law.
14

15 37. Nurmi had an enormous conflict of interest in staying on the case – which
16 he did for his own pecuniary gain. Nurmi was paid approximately \$2.5 million
17 dollars in taxpayer money defending Plaintiff. In addition to his taxpayer-funded
18 fee, he had the motivation to stay on the case because of the money he would
19 make publishing a book trashing his client.
20

21 38. Nurmi reveals his utter hatred of Plaintiff in the book. Based at least in part
22 on that hatred, his intention was to publish a book exposing her confidences and
23 secrets for financial gain.
24
25

1 39. Nurmi made numerous knowing and intentional false statements in the
2 book.

3
4 40. Among these falsehoods is Nurmi's stated premise of the book itself – that
5 he was compelled to act as Plaintiff's attorney. This is false. Nurmi had numerous
6 opportunities to be relieved of the representation.

7
8 41. Had Nurmi revealed his hatred and intent for financial gain to the court he
9 would have been released as counsel.

10 42. Nurmi stated to others at the time that he was willing to stay on the case so
11 long as he was paid by the county at a rate higher than that normally paid to court-
12 appointed contract counsel.

13
14 43. The rate for contract capital defense attorneys in Maricopa County at the
15 time of these events was \$125 per hour. When Nurmi went into private practice
16 during the course of the case, he filed a motion in the court demanding he be paid
17 an additional \$100 per hour to represent Plaintiff. The court granted his request,
18 thereby charging the taxpayers \$225 per hour for his services.

19
20 44. Nurmi was clearly selfishly motivated to stay on the case – undermining the
21 entire premise of his self-serving book.

22
23 45. Nurmi's book is a near-constant repetition of derogatory statements about
24 Plaintiff, her family, the witnesses, and the opposing counsel. Nearly everyone
25 involved in the trial is the subject of Nurmi's vitriol.

1 46. The ethical violations Nurmi committed in writing this book are too
2 numerous to fully describe in this Complaint. The chapters in the book
3 summarized below are merely samples of Nurmi's numerous ethical and fiduciary
4 breaches, they are not intended as an exhaustive review of each ethical and
5 fiduciary violation committed by Nurmi. The book and all other published
6 statements by Nurmi about Plaintiff, including but not limited to those listed in
7 Exhibit 1 reveal many more ethical violations, well beyond those summarized
8 here.
9

10
11 **a. Introduction**

12 47. In this section, Nurmi states: "once I had a sense of where this case was
13 going I was willing to give up a job that I liked simply to get away from Ms.
14 Arias..." (Page xxi). This demonstrably false.
15

16 48. The Introduction of the book reveals Nurmi's disgust and hatred of
17 Plaintiff. He says in the book that he came up with the title: "Trapped with Ms.
18 Arias" for one reason: "The reason is simple... Jodi Ann Arias hates being
19 referred to as Ms. Arias."
20

21 49. That Nurmi chose the title shows his vengeful, hateful attitude towards his
22 former client in that he published a book that constantly refers to her by that title
23 merely because he thinks she would hate it. It is juvenile and unprofessional in the
24
25

1 extreme for an attorney with fiduciary duties to his former client to engage in this
2 type of public behavior.

3 50. Nurmi's personal animus and dislike of his client permeates each chapter of
4 the book. One such statement is as good an example as any: "As I say this, keep in
5 mind, I surely did not like Ms. Arias at the time and that [sic] I could have cared
6 less about her image." (Page 182).

7
8 51. Nurmi's statements in this introduction violated numerous ethical rules and
9 fiduciary duties.
10

11 **b. Chapter 4**

12 52. Chapter 4 is the beginning of Nurmi's unfettered discussion of his "mental
13 impressions" of the case and of Plaintiff's mental health. Nurmi's mental
14 impressions are protected by the work product privilege, and his disclosures of
15 them throughout the book constitute a serious breach of his fiduciary duties to
16 Plaintiff.
17

18 53. Nurmi discusses as a central theme of the book his "theory" that Plaintiff
19 was the victim of sexual abuse as a child. He fully admits later in the book (Page
20 58) that this is pure speculation on his part and merely his own personal theory -
21 for which the defense team found absolutely no supporting evidence.
22 Nevertheless, he reiterates his mental impressions on this issue - which are not
23
24
25

1 only pure speculation but also privileged, confidential and personal in the extreme
2 to Plaintiff – throughout the book.

3
4 54. Nurmi also writes that Plaintiff's sentence is "justified". (Page 25). This is
5 yet another egregious example where Nurmi shares his mental impressions of the
6 case, which underlie the basis for his outrageous statement. For a criminal defense
7 attorney to publicly state that his client, who he publicly urges should get a retrial
8 of her capital murder case, deserves the life sentence she got is an egregious
9 example of the breach of fiduciary and ethical duties.
10

11 55. Nurmi repeatedly discusses unsubstantiated claims that Plaintiff abused
12 animals in her early years. Nurmi states: "the records presented in this case
13 indicated that she was abusing animals at a young age. Keep in mind such reports
14 came from Ms. Arias' own family members." (Page 26).
15

16 56. This statement, repeated throughout the book, is false.

17
18 57. Nurmi knew that this is false and is extremely hurtful to Plaintiff, who loves
19 animals. He also knew that it is red meat to the "haters" of Plaintiff and feeds into
20 the public's insatiable appetite for negative information about her.

21 58. Nurmi disclosed this false information in his book – information that had
22 never seen the light of day until he published it to the world. During the trial
23 Nurmi went to extreme lengths to keep this information out of the public realm.
24 Nurmi moved to preclude it during a bench conference, because it was prejudicial.
25

1 The court agreed, and ordered that the prosecutor instruct his expert witness not to
2 testify about it. Following the 2013 trial, the judge temporarily unsealed all bench
3 conferences because of a media request. Nurmi himself immediately moved to
4 “reseal” those transcripts, because they referred to this unsubstantiated and untrue
5 allegation which would seriously harm Plaintiff and her defense. The court
6 granted Nurmi’s request, and again ordered the information be sealed. The bench
7 conference transcripts discussing this issue were only public for approximately 1.5
8 days, and the information itself about animal abuse (discussed at the bench
9 conferences) was sealed by the court, and has remained under seal – until Nurmi
10 disclosed it himself, in his book – to hurt his client and for his own self-gain.

11
12
13
14 59. Statements Nurmi refers to here were never made public prior to the
15 publication of his book. There are references to this issue at Pages 26 and 147 –
16 though the book is replete with repetitions of it. This information remains under
17 seal to this day pursuant to the court’s order re-sealing it. Nurmi’s conduct in
18 this regard violates confidentiality and privilege. It also violates the order of the
19 court, resealing the information. His conduct is also patently dishonest,
20 unprofessional, reprehensible, and violates numerous ethical rules and fiduciary
21 duties.
22

23
24 60. Nurmi’s statements in this chapter violated numerous ethical rules and
25 fiduciary duties.

1 **c. Chapters 6 through 15**

2 61. In Chapters 6 through 15, Nurmi continues his discussion of his mental
3 impressions about Plaintiff, the evidence and his "theory of the case" concerning
4 how he would present the defense. These chapters, consistent with the entire book,
5 are replete with statements such as "gave me a strong impression", "my initial
6 assessment", "I surmised that", "so what did this all mean to me", "it was my
7 theory that", "I found these [] to be of particular importance", "it was important
8 because it told me", "I was left with the impression that", "why did I choose this
9 course" [followed by a detailed explanation]. These repeated disclosures by
10 Nurmi of his mental impressions of the client, the witnesses, the evidence, and his
11 working theories of the defense are littered throughout the entire book, and
12 involve repeated violations of Nurmi's duty of confidentiality and privilege to
13 keep confidential such information about Plaintiff.
14

15 62. Nurmi's statements in these chapters violated numerous ethical rules and
16 fiduciary duties.
17

18 **d. Chapter 16**

19 63. Chapter 16 begins with Nurmi discussing letters the victim allegedly wrote
20 Plaintiff. Nurmi states: "After the verdict and before sentencing, Ms. Arias
21 released these letters on her fan page." (Page 87).
22
23
24
25

1 64. This is demonstrably false. Plaintiff was incarcerated and had no access to
2 the internet. In addition, the letter was leaked on a site that supported the
3 prosecution - not the defense. In addition, only one letter was leaked -- not plural
4 letters. Nurmi was aware of the true facts concerning this issue, which he
5 intentionally misrepresents in his book.
6

7 65. The content of the ten letters at issue in this chapter were never made a part
8 of the public record in the case - and Nurmi's discussion of them therefore
9 violates client confidentiality as well as the attorney-client privilege.
10

11 66. On Page 88, Nurmi discusses a meeting with Plaintiff and specific
12 information she provided to him at the meeting regarding the letters, which were
13 potentially critical pieces of evidence in the case.
14

15 67. Nurmi himself was the source of the leaked letter that appeared on the state-
16 supportive website. Nurmi emailed one of the State's witnesses in an effort to turn
17 that person in favor of the defense side. Nurmi later told Ms. De La Rosa that he
18 in fact emailed a copy of the letter to this state witness. Despite these facts, Nurmi
19 blames Plaintiff for this in the book.
20

21 68. Nurmi's unethical conduct in this regard is compounded by the fact that he
22 speaks publicly about it in his book, knowing that it was not part of the public
23 record in his client's case. His disclosures concerning this topic violate multiple
24 ethical rules and fiduciary duties.
25

1 69. On Page 91, Nurmi discusses a "cell search" during which the deputies
2 found "pens" and a "3 by 5 note card" with handwriting. Although this issue was
3 briefly mentioned during a court hearing, the details were never made public and
4 did not become generally known.
5

6 70. Nurmi's statements in this chapter violated numerous ethical rules and
7 fiduciary duties.
8

9 **e. Chapter 19**

10 71. Nurmi's disclosures in Chapter 19 reveal a particularly disturbing aspect of
11 his relationship with Plaintiff. This involves his unprofessional and prurient
12 preoccupation with the sexual nature of the case, as well as Plaintiff herself.
13 Nurmi was fixated on the sexual aspect of the case, would frequently engage in
14 inappropriate conversations with others involving sexual references about himself
15 and/or the case.
16

17 72. Nurmi had a disturbing, sexual fascination with the case and with Plaintiff
18 and demonstrated a sexist, chauvinistic, domineering, disparaging, demeaning and
19 belittling way of dealing with Plaintiff.
20

21 73. In many references in his book, both overt and implied, Nurmi asserts that
22 Plaintiff flirted with him and actually perceived him as "her boyfriend." This is
23 false.
24
25

1 74. Nurmi was preoccupied with the sexual aspects of the case, and Plaintiff's
2 sexuality. Rather than act like a professional in dealing with these aspects of the
3 case, Nurmi was obsessed with them, acting in consistently unprofessional – and
4 often juvenile – manner.
5

6 75. One of many examples of this is found at page 190 of the book. Here,
7 Nurmi alleges that Plaintiff told him about “the current state of her vaginal
8 grooming.” Revealing this conversation violates privilege and ER 1.6. Second, it
9 is completely false.
10

11 76. Nurmi asked Plaintiff about this issue – and also asked two of her ex-
12 boyfriends about it. This is further evidence of both his own obsession with
13 Plaintiff's sexuality, his dishonesty, his unprofessionalism, and his willingness to
14 reveal confidential and privileged information in violation of his duties as an
15 attorney.
16

17 77. Nurmi engaged in his own personal use of “The Naked Pictures” of Plaintiff
18 (which are discussed in Chapter 33). When Plaintiff expressed her legitimate
19 concerns to him about the nude pictures of her being displayed in open court,
20 Nurmi responded by taunting her and tell her that he had blowups made of some
21 of the more graphic, naked pictures of her and hung them up in his office for
22 anyone to see.
23
24
25

1 78. Plaintiff was appalled and disgusted by his response. This unprofessional
2 conduct by Nurmi needlessly heightened her anxiety about a legitimate concern.
3
4 Instead of addressing his client's concerns about his use of the pictures at trial, he
5 aggravated them by implying that even he – her own attorney – was using them in
6 a prurient and unprofessional way.

7 79. Nurmi used one of the naked pictures as the screen saver on his personal
8 computer in his office. This was visible to his staff, other clients, and anyone else
9 who may have visited his office.
10

11 80. In Chapter 19, Nurmi states: "however, as you might guess the people
12 Plaintiff could get the most money from were her 'suitors' so it was with these
13 people that she dedicated most of her time." (Page 104). This is false: Nurmi
14 had no access to Plaintiff' outgoing mail, and so he did not have any basis
15 whatsoever to make this false accusation.
16

17 81. Nurmi's discussion at the end of chapter 19 constitutes among the very
18 worst and most egregious ethical violations in his book. (Page105). Nurmi
19 provides the State a roadmap on how to put Plaintiff on death row in the event that
20 her conviction is reversed and she is granted a new trial. Conversely, he also
21 concedes (later in the book) that Plaintiff did not receive a fair trial - implying that
22 a reversal and new trial is required. Nurmi provided the State with confidential
23
24
25

1 and privileged information about how to obtain a death verdict against his client.
2 The State will know exactly how to convict her.

3 82. Nurmi's statements in this chapter violated numerous ethical rules and
4 fiduciary duties.
5

6 **f. Chapter 21**

7 83. In Chapter 21 Nurmi discusses "The Murder Weapon". He states: "In my
8 mind, regardless of whose gun it was, she still went to great lengths to kill him as
9 opposed to 'protecting herself' as she claimed." (Page 112.) This constitutes yet
10 another example of Nurmi violating client confidentiality, attorney-client
11 privilege, as well as work product privilege. Nurmi is stating that based on the
12 confidential information he gained in the case and disclosed, he wanted the world
13 to know that Plaintiff lied and perjured herself. However, it was in fact Nurmi
14 who pushed a self-defense strategy, against Plaintiff's wishes.
15
16

17 84. Nurmi's statements in this chapter violated numerous ethical rules and
18 fiduciary duties.
19

20 **g. Chapter 22**

21 85. In Chapter 22, Nurmi discussed his own convoluted, incorrect and
22 disturbing notions about what he "thinks" he is allowed to disclose concerning
23 Plaintiff - and why. He refers to her post-trial media interviews and says that
24 Plaintiff complained about his failure to call certain witnesses and that Plaintiff
25

1 “chose to portray herself as the victim of [his] poor choices.” He then states that
2 reasons why the public should not believe her. He writes:

3
4 Do you believe any of Ms. Arias’ claims about these supposed
5 witnesses? Do you believe that Ms. Arias is a victim of my poor
6 choices? You would be wise not to believe either of these propositions
7 because they are not true. At the time she was saying these things
8 about me I was not happy about it as I could not respond. I was still
9 her lawyer and the case was not over yet. So certainly at the time I
10 was both upset ... because she was lying about me and I could not
respond. However, as I sit here today I’m very happy she made these
claims in such a public forum because I can now respond without fear
of disclosing privileged information. Why? Ms. Arias herself waived
privilege on this issue when she gave this interview.” (Page 114).

11 86. Nurmi does not understand the difference between the attorney-client
12 privilege and client confidentiality under Ethical Rule 1.6.

13
14 87. ER 1.6 states in pertinent part: “A lawyer shall not reveal information
15 relating to the representation of a client unless the client gives informed consent,
16 the disclosure is impliedly authorized in order to carry out the representation” or
17 the disclosure otherwise falls under one of the exceptions to the rule. See ER
18 1.6(a). The paramount importance of client confidentiality is acknowledged in
19 both state and federal courts. “As a representative of his client [] the lawyer is
20 admonished not to reveal information relating to the representation of his client.”
21
22 *Hitch v. Pima County Superior Court*, 146 Ariz. 588 (1985), citing ER 1.6. See
23 also, *Perillo v. Johnson*, 205 F.3d 775 (2000), citing ABA Model Rule of
24 Professional Responsibility 1.6 (and Comment 5 thereto). ER 1.6 is extremely
25

1 broad - indeed, significantly broader than attorney-client privilege. It protects
2 from disclosure all information relating to a lawyer's representation, whether or
3 not it derives from privileged communications with clients. ER 1.6 applies at all
4 times during, and even after, a representation. On the other hand, the attorney-
5 client privilege is more limited in scope than confidentiality under ER 1.6.
6 Privilege protects from compelled disclosure the substance of attorney-client
7 communications made for the purpose of obtaining or imparting legal advice or
8 assistance, and applies only in the context of a legal proceeding governed by the
9 Rules of Evidence.
10
11

12 88. Nurmi's failure to comply with these basic concepts governing lawyers
13 reveals that he has chosen to willfully violate them. The fact that he told Ms. De
14 La Rosa that he knew writing the book would cost him his law license,
15 demonstrates that his violations of his duties to Plaintiff were knowing and
16 intentional.
17
18

19 89. Nurmi was duty-bound to keep such information secret forever. Nurmi
20 purposefully chose to ignore his fiduciary duties to Plaintiff.

21 90. Nurmi claims that witnesses he did not call could not have helped Plaintiff.
22 He discusses her mother Sandy Arias' statement to him that she had observed
23 bruises on Plaintiff. He states that her mother "was so clearly lying about this
24 issue, lying so poorly that it would have been laughable under other
25

1 circumstances... Sandy Arias was more than willing to lie for her daughter.”
2 (Page 116). Information he was provided, and what he thought about it, are work-
3 product protected “mental impressions” and also confidential under ER 1.6.
4

5 91. The book is replete with examples of Nurmi's unauthorized disclosures of
6 attorney-client privileged and/or confidential information. At Pages 188-191,
7 Nurmi discloses his conversations with Plaintiff. At Page 209 Nurmi discloses a
8 specific discussion he had with Plaintiff about continued representation. At Page
9 291 Nurmi discusses his inability to persuade Plaintiff to follow his advice. These
10 are a few examples illustrating Nurmi's disregard of his ethical duties to keep
11 secret his client's confidences.
12

13
14 92. Nurmi's statements in this chapter violated numerous ethical rules and
15 fiduciary duties.

16 **h. Chapter 28**

17 93. Chapter 28 contains further examples of Nurmi's disregard for client
18 confidentiality and the attorney-client privilege. He describes his client in
19 unfavorable terms concerning how she interacted with him during privileged legal
20 calls from jail. At page 165 (lines 13-18) he describes her behavior while on the
21 phone with him – including why she said what she said. The information he
22 makes public here is clearly protected by confidentiality under ER 1.6, and also
23 involves his mental impressions.
24
25

1 94. Nurmi's statements in this chapter violated numerous ethical rules and
2 fiduciary duties.

3
4 **i. Chapter 29**

5 95. Nurmi starts out Chapter 29 by stating the following:

6 What I ultimately had on my hands was a woman who clearly had
7 brutally killed her former boyfriend and who wanted to claim that he
8 was an abusive pedophile. Her story went on to include assertions that
9 on the day of his death this abusive pedophile tried to attack her and
10 she was forced to defend herself. Equally clear to me was that Ms.
11 Arias wanted to make these assertions in a high profile setting. Ms.
12 Arias wanted to attack Mr. Alexander's reputation on a worldwide
stage and she wanted me to aid her in this quest. Frankly, it seemed to
me that making these attacks was more important to Ms. Arias than the
outcome of her case. (Page 169).

13 96. The ethical violations resulting from this disclosure are numerous and
14 serious. These statements violate ER 1.6, attorney-client privilege and work
15 product privilege. In addition, they are demonstrably false – and Nurmi knows
16 they are false.

17
18 97. Statements in the book that Plaintiff wanted to publicly trash Mr. Alexander
19 are false, Nurmi knows they are false, and he writes them for no other purpose
20 then to curry favor with and admiration from the "haters" of Plaintiff. The
21 defense strategy that Nurmi chose clearly fanned the flames of public animus
22 towards her. His effort after-the-fact to blame her for this is duplicitous,
23 outrageous, and disturbing.
24
25

1 98. Nurmi claims in the book that Plaintiff “forced” him to pursue a self-
2 defense strategy at trial. (Page 170). This is patently false.

3
4 99. Nurmi had made it clear to the rest of the defense team that they would
5 abide by his decision and pursue self-defense.

6 100. Nurmi insisted on self-defense. It was Nurmi’s strategy. It was the defense
7 he wanted to pursue, and that he forced on the rest of the defense team and the
8 client because he was lead counsel in the case.

9
10 101. Nurmi, immediately following the guilty verdict, began his smear campaign
11 to blame Plaintiff for his own failed strategy. He immediately started laying fault
12 for the first-degree murder conviction at the feet of his client, and audaciously
13 claimed it was she who wanted to assert self-defense.

14
15 102. Nurmi’s assertion that “I wanted no part of Ms. Arias’ plan to attack Mr.
16 Alexander.” (Page 170) is false. It was his strategy to attack the victim and
17 pursue self-defense.

18
19 103. Nurmi’s statements in this chapter violated numerous ethical rules and
20 fiduciary duties.

21 **j. Chapter 31**

22
23 104. Nurmi devolves into a long, personal lament over how he was forced to stay
24 on Plaintiff’ case. This is patently untrue.

1 105. It is true that motions to withdraw were denied. However, there were
2 multiple opportunities presented to him to get off the case. He did not avail himself
3 of those opportunities.
4

5 106. In Chapter 31, Nurmi states that once he left the public defender's office
6 and went into private practice, Plaintiff could place collect phone calls to him.
7 (Page 182). He bitterly complains about this, because he was then forced to "pay
8 to talk to the client that I did not want to represent." He explains how he
9 instructed his staff to frequently not accept Plaintiff's calls when he was not in,
10 which resulted in his staff "hanging up on her so that I would not be charged for
11 them." He goes on to malign his client for thinking she was "special" and that
12 because she was "special" she should be able to leave her "meaningless messages"
13 with someone from his office, rather than simply being hung up on.
14

15 107. Nurmi had motioned the court seeking reimbursement for calls from
16 Plaintiff, and his request was granted. His decision to have his staff hang up on
17 the client is even more disturbing given that he could indeed have been
18 reimbursed for the calls, and what he says in his book about this issue is, yet
19 again, completely false. Further, criminal defense counsel are routinely allowed to
20 receive calls from incarcerated clients for no charge.
21

22 108. Nurmi's statements in this chapter violated numerous ethical rules and
23 fiduciary duties.
24
25

1 **k. Chapter 32**

2 109. This chapter is replete with Nurmi's assaults on his Plaintiff's character.
3
4 Nurmi once again displays what he clearly believes is his own cleverness and
5 mastery of attorney-client privilege, by refraining from mentioning what words
6 were stated by him and his client. However, all the information about what
7 happened during his visits with his client is confidential.

8
9 110. Nurmi accuses Plaintiff of being manipulative during the jail visits. He
10 refers to a jail visit during which Plaintiff cried, and states: "as I sat there I
11 certainly gained a lot of insight into how Ms. Arias was able to prevail over her
12 parents as a child." (Page 191). This statement is particularly outrageous. Nurmi
13 knew that the evidence in the case confirmed that Plaintiff and her brother were
14 beaten by their parents when they were children. The fact that Nurmi knows this
15 and still made these comments reveals his utter dishonesty, lack of concern for his
16 client, and lack of professionalism.

17
18
19 111. It was Nurmi's rudeness, chauvinism and meanness towards Plaintiff that
20 frequently made her cry.

21 112. Nurmi was freakishly controlling and domineering in his dealings with
22 Plaintiff. He would purposefully withhold information and advice about the case
23 from her, to punish her for behavior he did not like – such as her crying.
24
25

1 113. On one occasion, Nurmi ordered Ms. De La Rosa to lie to the client and
2 withhold the fact that he had gone to Las Vegas to interview a male friend
3 Plaintiff was corresponding with from jail. Ms. De La Rosa specifically asked
4 Nurmi if he was ordering her to lie to the client, and he told her unequivocally:
5 "Yes."

7 114. When the defense team would visit Plaintiff in jail, Nurmi would order all
8 of them to leave the meeting if Plaintiff cried. This even happened on one
9 occasion when they went to discuss a "life sentence" plea offer with Plaintiff.

11 115. Nurmi was consistently unkind, controlling and manifestly unsympathetic
12 to his client – even as she faced the death penalty.

14 116. Nurmi discusses in his book an example of this behavior towards his client.
15 He describes a jail visit with Plaintiff in which she cried, and he walked out. He
16 states: "I cannot remember the exact situation that was at issue. If I recall
17 correctly, the conflict I was having with Ms. Arias at the time related to filing a
18 certain motion."

20 117. Contrary to Nurmi's statement, he had scheduled the visit with Plaintiff to
21 discuss the results of a psychological test that he has asked her to take. Nurmi had
22 asked Plaintiff to do this to help her defense, and then told her he would visit her
23 in the jail the next day to discuss the results. When he arrived, he told her he had
24 "changed his mind" and wasn't going to discuss it with her. She had done what he
25

1 had asked, but he simply refused to tell her the result, what it meant to the case, or
2 why he had asked her to do it and then changed his mind. Plaintiff reminded him
3 that it was the express purpose of their visit. Nurmi simply repeated that he had
4 changed his mind and if she wanted to discuss something else related to the case
5 they could – but if she insisted on discussing what he come to see her about and
6 asked her to do, he would simply leave.
7

8
9 118. This kind of unprofessional and demeaning behavior was a hallmark of
10 Nurmi's representation of Plaintiff. It was observed on numerous occasions by
11 Ms. Willmott and Ms. De La Rosa, and disturbed them greatly.

12
13 119. Nurmi's statements in this chapter violated numerous ethical rules and
14 fiduciary duties.

15 **I. Chapter 33**

16 120. Chapter 33 deals with Nurmi's discussion of "The Naked Pictures" of
17 Plaintiff that were evidence in the case. Nurmi's personal use of these photos
18 demonstrates his unhealthy view of his client, his obsession with the sexually-
19 charged aspects of the case, and the utterly unprofessional way he conducted
20 himself before, during and after his representation of Plaintiff.
21

22 121. Nurmi's statements in this chapter violated numerous ethical rules and
23 fiduciary duties.
24
25

1 **m. Chapter 34**

2 122. Nurmi would obsessively read Plaintiff's voluminous in-coming mail– even
3 when it had nothing whatsoever to do with the case. In Chapter 34, he discusses
4 how he went to Las Vegas to track down and interview someone that Plaintiff was
5 corresponding with from jail. (Page 201). Nurmi characterizes this platonic male
6 friend of Plaintiff of having “some bizarre sexual fantasy that only existed in his
7 head.”
8

9
10 123. Plaintiff and this person had maintained a purely non-sexual friendship for
11 the past seven years, and her correspondence with him was completely platonic
12 and devoid of sexual innuendo.
13

14 124. Nurmi was obsessed with the sexual aspects of the case and with Plaintiff.

15 125. Nurmi's statements in this chapter violated numerous ethical rules and
16 fiduciary duties.
17

18 **n. Chapter 35**

19 126. Chapter 35 is replete with personal attacks by Nurmi upon Plaintiff.

20 127. These myriad personal attacks against his client are particularly egregious,
21 shocking and outrageous.
22

23 128. Nurmi's statements in this chapter violated numerous ethical rules and
24 fiduciary duties.
25

1 **o. Chapter 36**

2 129. Nurmi dedicates Chapter 36 to discussing his underlying motivation in
3 writing the book— his hate for Plaintiff and for having been “forced” to represent
4 her. The entire chapter is devoted to this topic. Although often repeated
5 throughout the book, Nurmi clearly and unequivocally discloses here his hatred
6 for Plaintiff both during the representation and continuing after. “Let me repeat
7 myself since some of you seem so convinced otherwise. I did not and do not like
8 Ms. Arias.” (p. 207) The remainder of Chapter 36 continues this offensive vitriol.
9

10
11 130. In Chapter 36 Nurmi provides sickening details behind the statement he
12 made during closing argument in the trial, that: “9 out of 10 days” he did not like
13 Plaintiff. He states: “if I had my way the accusations she made against Mr.
14 Alexander would never have come to light during the trial. However, what I
15 wanted or the damage that doing this would do to me did not matter to her.”
16 (Page 208).
17

18
19 131. This statement reveals Nurmi’s focus on himself, rather than his client
20 charged with capital murder. It presumes that his client should also have been
21 focused on him, rather than on defending herself from first degree murder charge
22 and avoiding a death sentence. It reveals also Nurmi’s utter lack of
23 professionalism, and the self-centered personality which he displays throughout
24 the entire book. His statements about this are utterly false.
25

1 132. Nurmi was fixated on making a full-on attack of Mr. Alexander and his
2 character the centerpiece of the defense. Nurmi pursued this strategy doggedly, in
3 his pretrial preparation and throughout the trial, in his extensive use of Mr.
4 Alexander's text messages, emails and the audio "Phone sex" audio tape, as well
5 as the nude photos Mr. Alexander took of Plaintiff. Nurmi used all of this in his
6 effort to prove to the jury that Mr. Alexander was not the devout Mormon he
7 portrayed himself to be, but instead was a sexual deviant who abused Plaintiff in
8 many different ways, including physically the day of the murder. It was the
9 centerpiece of his defense strategy.
10

11
12 133. As the trial approached Nurmi made the decision to use the highly negative,
13 damaging and bombshell information about Mr. Alexander as the core of the
14 defense at trial because it supported the claim that Plaintiff was a victim of
15 domestic violence. According to the domestic violence experts, the more pressure
16 Mr. Alexander felt about the conflict between being a single, unmarried Mormon
17 versus his desires for pre-marital sex, the more likely he would hide the sex, and
18 hide his relationship with Plaintiff. Also the more pressure and tension he had, the
19 more likely he was to lash out at the one person who knew about his "dual
20 personality" – Plaintiff.
21

22
23 134. Nurmi made this decision as lead chair. It was he who didn't care about the
24 damage it would do to anyone – Mr. Alexander, his family, or anyone else.
25

1 135. Nurmi flagrantly misrepresented this issue in his book - again in an effort to
2 blame and shame Plaintiff, endear himself to the voracious public "haters" of her
3 and in the process enrich himself.
4

5 136. Nurmi states: "Ms. Arias was perfectly content to risk ruining my career by
6 forcing me into a position where I would have to make these assertions against
7 Mr. Alexander." This statement is false. Nurmi himself was intent on exposing
8 Mr. Alexander's secret life.
9

10 137. An example of this involves Nurmi's decision to play in open court the
11 infamous "phone sex" audio tape of a call between Plaintiff and Mr. Alexander. It
12 was extremely embarrassing for her. Nurmi insisted on it.
13

14 138. The judge who presided over the trial offered to let the defense play the
15 phone sex tape to the jury in a sealed session, and exclude from the courtroom the
16 public and press. Nurmi wanted the sex tape played publicly, on live TV, live
17 streamed online, in real time, all over the world.
18

19 139. Ms. Willmott asked Nurmi why he insisted on playing the tape in open
20 court, live-streamed to the world, when it would so badly embarrass the client and
21 was upsetting her so greatly - for no legitimate legal benefit that Ms. Willmott
22 could discern, since the jury would hear the tape. Ms. Willmott clearly recalls
23 Nurmi's response: "She (Plaintiff) just needs to put on her big girl panties."
24
25

1 140. Nurmi's claims in his book that Plaintiff insisted on a defense attacking Mr.
2 Alexander are not only patently false, but they are part and parcel of his full-
3 blown effort to blame his failed defense strategy on his client, and not on himself.
4 His conduct is patently self-serving, and obviously so. It also violates his fiduciary
5 duties to his client - including confidentiality, privilege, work product, and his
6 duties of loyalty. It also evidence of a conflict of interest which existed during the
7 time he represented Plaintiff and continues to this day as he publicly defends his
8 actions by blaming them on his client.
9

11 141. Nurmi's statements in this chapter violated numerous ethical rules and
12 fiduciary duties.
13

14 **p. Chapter 40**

15 142. In Chapter 40 is another one of Nurmi's numerous, verifiable lies against
16 Plaintiff: "He [the state's expert witness] testified that it was probable that Ms.
17 Arias wrote the messages in these magazines..." (Page 231). Although the state
18 tried to convince the court and later two juries that Plaintiff wrote the messages in
19 these magazines, no expert testimony was ever elicited to support this claim. Not
20 only did the state's expert never testify to handwriting in the magazines no such
21 analysis appears anywhere in this expert's notes or report. Nurmi was present at
22 all hearings related to this issue. Therefore, he knows the facts and is intentionally
23
24
25

1 making false statements about this issue in his book for his own self gain and to
2 the detriment of Plaintiff.

3 143. Nurmi's statements in this chapter violated numerous ethical rules and
4 fiduciary duties.
5

6 **Chapter 48**

7 144. In Chapter 48 Nurmi states: "I never harbored any illusions that Ms. Arias
8 would not be convicted of first degree murder". (Page 278). This is false. Nurmi
9 was so sure of his abilities – an attitude that his trial performance and his book
10 both reveal was clearly unwarranted – that he would not allow his Mitigation
11 Specialist or his co-counsel to fully investigate the mitigation in the case as they
12 were repeatedly asking to do.
13
14

15 145. Nurmi's statements in this chapter violated numerous ethical rules and
16 fiduciary duties.
17

18 **I. Ethical Rules Violated**

19 146. Nurmi's conduct as set forth herein violates the following Ethical Rules:
20 1.6, 1.7(a)(2), 1.8(b), 1.9(c)(1) and (2), 1.16(d), 3.3, 3.4(c), 3.6(a), 4.1, 8.4(c) and
21 (d), and Supreme Court Rules 41(f) and (g), and 54(c).
22

23 147. Nurmi's publication of confidential client information violated ERs 1.6,
24 1.9(c)(2), and Rule 41(f).
25

148. Plaintiff never gave Nurmi permission to disclose confidential information.

1 149. There was no controversy (as contemplated by ER 1.6) between Plaintiff
2 and Nurmi at the time he published the book.

3 150. There is no exception within ER 1.6 which made it permissible for him to
4 disclose his client's confidences – nor the information littered throughout the book
5 that is protected by attorney-privilege, work product and his “mental impressions”
6 of the case.
7

8 151. Nurmi published confidential client information to the detriment of his
9 former client in violation of ERs 1.8(b), 1.9(c)(1), 1.16(d) and 8.4(d). Nurmi's
10 expressed opinion, as her attorney, that she was the victim of sexual abuse and
11 mentally ill is self-evidently harmful.
12

13 152. Nurmi engaged in a conflict of interest in violation ERs 1.7(a)(2) and
14 1.8(b). He hatched his plan to write the book during the representation, long
15 before trial. His personal interest in keeping from the court his true feelings about
16 his client, so that he could stay on the case and later write a book disparaging her
17 and revealing her confidential information in the process - for his own benefit -
18 violates the conflict of interest rules.
19

20 153. Nurmi's lack of candor to the tribunal about these issues violates ER 3.3.
21 The many false statements he published in his book violate ERs 4.1 and 8.4(c).
22

23 154. Nurmi's publication of confidential client information while his client's
24 case is still on appeal violates ERs 1.16(d), 3.6(a) and 8.4(d).
25

1 155. Nurmi publicly disclosed information about the case that was sealed by
2 order of the court. His conduct violates ER 3.4(c), 8.4(d) and Supreme Court Rule
3 54(c).
4

5 156. Nurmi's unprofessional, hateful and derogatory statements about his client,
6 her family members, the witnesses and counsel constitute repeated and substantial
7 violations of the lawyer's oath and creed. His inappropriate obsession about the
8 sexual aspects of the case and his client – including most egregiously his personal
9 prurient use of his client's naked photos – and the statements he made about her to
10 other members of the defense team (and likely numerous others) involve multiple
11 violations of Rule 41(g).
12

13 157. Nurmi's multitude of violations of the ethical rules is shocking, outrageous
14 in the extreme, repeated, self-serving, egregious, and a complete abdication of his
15 ethical and fiduciary duties and responsibilities to Plaintiff.
16

17 158. After publication of the book, Nurmi engaged and continues to engage in
18 numerous public appearances in a variety of media including social media for the
19 purpose of marketing the book. Upon information and belief, Nurmi received
20 payment for some or all of these appearances.
21

22 159. Nurmi's disclosure of confidential and/or privileged information, false
23 statements and portrayals of Plaintiff in public via media appearances including
24 social media is shocking, outrageous in the extreme, repeated, self-serving,
25

1 egregious, and a complete abdication of his ethical and fiduciary duties and
2 responsibilities to Plaintiff.

3 4 **COUNT ONE**

5 ***Breach of Fiduciary Duties***

6 160. Plaintiff incorporates by reference all previous allegations as though fully
7 set forth herein.

8
9 161. As Plaintiff's attorney, Nurmi owed Plaintiff fiduciary duties associated
10 with the attorney-client relationship, a special relationship of confidence and trust,
11 upon which Plaintiff was entitled to and did rely.

12 162. In representing Plaintiff, Nurmi was obligated to act in good faith in
13 complying with his fiduciary duties and the duties imposed upon them by the
14 Arizona Rules of Professional Conduct.

15
16 163. Nurmi breached the fiduciary duties he owed to Plaintiff by engaging in
17 acts, omissions, concealments, and wrongful conduct, as described in detail in this
18 Complaint.

19
20 164. Nurmi breached his fiduciary duties to Plaintiff with the specific intent to
21 harm Plaintiff for the purpose of personal financial gain and enhancing his own
22 public image.

23
24 165. Nurmi failed to comply with and abide by his fiduciary duties as attorney
25 and failed to fulfill the duties imposed upon him by the Arizona Rules of

1 Professional Conduct. Nurmi did so by either acting negligently, intentionally or
2 with reckless disregard for Plaintiff's rights so as to violate the fiduciary duties
3 owed to her.
4

5 166. Nurmi's actions were directly adverse to the interests of Plaintiff and entitle
6 Plaintiff to an award of damages based solely on the breach of fiduciary duties.

7 167. Nurmi's engaged in shocking, outrageous, repeated, self-serving, egregious
8 conduct either with intent to harm Plaintiff, out of spite or ill will toward Plaintiff,
9 or with a conscious disregard of a substantial risk of significant harm to Plaintiff,
10 thereby entitling Plaintiff to an award of punitive damages.
11

12 168. Nurmi's breaches are continuing by sales of the book and marketing efforts.
13

14 **THEREFORE**, Plaintiff requests judgment against Defendants as follows:

- 15 a. For Plaintiffs compensatory damages, in an amount to be proven at
16 trial;
17
18 b. For Plaintiff's ongoing damages;
19
20 c. For punitive and exemplary damages in an amount sufficient to punish
21 Nurmi and ensure such conduct does not occur in the future, in an
22 amount to be proven at trial;
23
24 d. For pre and post judgment interest at the highest rate allowed by law;
25
e. For such other relief the Court deems just and proper.

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COUNT TWO

Unjust Enrichment

169. Plaintiff incorporates by reference all previous allegations as though fully set forth herein.

170. As a direct result of Nurmi's breach of fiduciary duties, he benefitted financially through sales of the book and by appearance fees on traditional and social media.

171. There is no justification for Nurmi to profit from his breach of fiduciary duties.

172. There is no adequate remedy at law to secure return of the money Nurmi received as a result of his breach of fiduciary duties.

173. As Plaintiff's agent, Nurmi is liable to Plaintiff for all money he received as a result of his breach of duties to her.

THEREFORE, Plaintiff requests judgment against the Defendants as follows:

- a) For all money received by Nurmi for sales of the book, appearance fees on traditional and social media and all other profits of any kind and degree Nurmi received as a result of his breach of duties;
- b) For pre and post judgment interest at the highest rate allowed by law;
- c) For such other equitable relief the Court deems just and proper.

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COUNT THREE

Constructive Trust

174. Plaintiff incorporates by reference all previous allegations as though fully set forth herein.

175. Nurmi's breach of fiduciary duties was unconscionable.

176. Nurmi unfairly holds money from the sales of the book, appearance fees and all other sources resulting from his breach of fiduciary duties.

177. Nurmi holds all such money in trust for Plaintiff.

178. Plaintiff holds an equitable interest in all moneys received by Nurmi from the sale and promotion of the book.

THEREFORE, Plaintiff requests judgment against the Defendants as follows:

- a) Imposition of Constructive Trust on all money received by Nurmi for sales of the book, appearance fees on social media and all other profits of any kind and degree Nurmi received as a result of his breach of duties;
- b) A return to Plaintiff of all money received by Nurmi for sales of the book, appearance fees on social media and all other profits of any kind and degree Nurmi received as a result of his breach of duties;
- c) For pre and post judgment interest at the highest rate allowed by law;
- d) For such other equitable relief the Court deems just and proper.

1 **WHEREFORE**, Plaintiff demands judgment against defendants, and each
2 of them as described above for the dollars, interest, costs and expenses incurred
3 herein, and non-monetary remedy and reasonable attorneys' fees, and for such
4 other and further relief as the Court may deem just and proper.
5

6 DATED this 24th day of October, 2017.
7

8 ADAMS & CLARK, P.C.

9 

10 Ralph Adams
11 Attorney for Plaintiff
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EXHIBIT 1

Nurmi Book Publication Date 11/10/2015

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