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IN RE:

Michael G. Shaw :
Magisterial District Judge :
Magisterial District 42-3-02 :
42nd Judicial District :
Bradford County : NO. 5 JD 2016

.....

ANSWER TO COMPLAINT

AND NOW comes Michael G. Shaw, Magisterial District Judge, by and through his attorneys, Griffin, Dawsey, DePaola and Jones, and files this Answer to Complaint against the Honorable Michael G. Shaw, Magisterial District Judge for Magisterial District 43-3-02 of Bradford County, Pennsylvania, alleging that Judge Shaw has violated the Rules Governing Standards of Conduct of Magisterial District Judges and Article V, Sections 17(b) and 18(d)(1) of the Constitution of the Commonwealth of Pennsylvania:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. After a reasonable investigation, Judge Shaw is without

knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 5, and strict proof thereof is demanded at trial.

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6. Admitted.

7. Legal conclusion. No Answer required. However, to the degree that an Answer is required, any allegations of judicial misconduct are denied, and strict proof thereof is demanded at trial.

8. Legal conclusion. No Answer required. However, to the degree that an Answer is required, any allegations of judicial misconduct are denied, and strict proof thereof is demanded at trial.

A. Impropriety: Sexting Conduct

9. Admitted.

10. Admitted.

11. Admitted.

12. Admitted.

13. Admitted.

14. Admitted.

15. Admitted.

16. Admitted.

17. Admitted.

18. Admitted.

19. Admitted.

20. Admitted.

21. Admitted. By way of further Answer, the Treatment Court Committee decided prior to any proceeding involving Treatment Court Participants what sanctions,

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if any, would be imposed.

22. Admitted.

23. Admitted.

24. Admitted.

25. Admitted.

26. Admitted.

27. Admitted.

Sexting Conduct: Girlfriend of Treatment Court Participant

28. Denied. After a reasonable investigation, Judge Shaw is unable to affirm or deny the current status of D.A. and J.L.

29. Admitted. By way of further Answer, the context of her contact with Judge Shaw was that she was breaking up with J.L. and was concerned about the impact that would have on his treatment. She expressed a concern that J.L. might relapse.

30. See Answer to #29 above.

31. See Answer to #29 above.

32. Admitted.

33. Admitted.

34. Admitted. By way of further Answer, the purpose of Judge Shaw's contact was to be prepared to help J.L. if he, indeed, had treatment issues because of the break up.

35. Admitted in part and denied in part. It is admitted that Judge Shaw sent text messages to D.A. from February, 2014 through April of 2014. The allegation of

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“frequent” is denied, and strict proof is demanded at trial.

36. Admitted.

37. Admitted.

38. Admitted. By way of further Answer, it is admitted that one definition of “sexting” is set forth at www.merriam-webster.com/dictionary.

39. Admitted. By way of further Answer, it is admitted that one definition of “sexting” is set forth at www.urbandictionary.com.

40. Denied. As Judge Shaw does not have access to his phone, he cannot affirm or deny the specific contents of the messages, and strict proof thereof is demanded at trial.

41. Denied. As Judge Shaw does not have access to his phone, he cannot affirm or deny the specific contents of the messages and strict proof thereof is demanded at trial.

42. Denied. As Judge Shaw does not have access to his phone, he cannot affirm or deny the specific contents of the messages and strict proof thereof is demanded at trial.

43. Denied. As Judge Shaw does not have access to his phone, he cannot affirm or deny the frequency of the text messages, and strict proof thereof is demanded at trial.

44. Admitted.

45. Admitted.

46. Admitted.

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47. Denied. The hotel room was paid for by D.A.

48. Admitted.

49. Admitted.

50. Admitted.

51. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 51, and strict proof thereof is demanded at trial.

52. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 52, and strict proof thereof is demanded at trial.

53. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 53, and strict proof thereof is demanded at trial.

54. Denied. After a reasonable investigation, Judge Shaw is without Knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 54, and strict proof thereof is demanded at trial.

55. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 55, and strict proof thereof is demanded at trial.

56. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 56, and strict proof thereof is demanded at trial.

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57. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 57, and strict proof thereof is demanded at trial.

58. Admitted.

59. Admitted in part and denied in part. Judge Shaw does not specifically recall where the conversation with J.L. took place, but does admit that in February of 2014, J.L. approached Judge Shaw about the phone calls and text messages between D.A. and Judge Shaw.

60. Admitted.

61. Denied. After a reasonable investigation, Judge Shaw cannot affirm or deny what, if anything J.L. did at that time, and strict proof thereof is demanded at trial.

62. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 62, and strict proof thereof is demanded at trial.

63. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 63, and strict proof thereof is demanded at trial.

64. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 64, and strict proof thereof is demanded at trial.

65. Denied. After a reasonable investigation, Judge Shaw is without

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knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 65, and strict proof thereof is demanded at trial.

66. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 66, and strict proof thereof is demanded at trial.

67. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 67, and strict proof thereof is demanded at trial.

68. Admitted in part and denied in part. Although Judge Shaw cannot affirm or deny the exact date, it is admitted that D.A. contacted him through Facebook. The remaining allegations of Paragraph 68 are admitted.

69. Admitted in part and denied in part. While Judge Shaw cannot affirm or deny the date, the remaining allegations of Paragraph 69 are admitted.

70. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 70, and strict proof thereof is demanded at trial.

71. Admitted. By way of further Answer, Judge Shaw indicated that his conduct was inappropriate and disrespectful in light of his marital status.

72. Admitted.

73. Admitted.

74. Admitted.

75. Admitted in part and denied in part. It is admitted that J.L. told Judge

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Shaw that he was very upset about Judge Shaw's relationship with D.A.

However, it is unclear as to what is alleged by the allegation that J.L. was "concerned." If the inference is that J.L. was concerned about his Treatment Court status, it is denied that there was any discussion regarding that issue, and strict proof thereof is demanded at trial.

76. Admitted.

77. Admitted.

78. Admitted.

79. Admitted.

80. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 80, and strict proof thereof is demanded at trial.

81. Admitted.

82. Admitted.

83. Admitted.

84. Admitted.

85. Admitted.

86. Admitted.

87. Admitted. By way of further Answer, Judge Shaw told J.L. that he had actually planned to resign from the Treatment Court as early as May of 2013, but did not because there was no one willing to take over at that time. Further, Judge

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Shaw told J.L. that he would be residing from Treatment Court as soon as he could talk to President Judge Maureen Beirne.

88. Denied. By way of further Answer, see answer to #87 above.

89. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 89, and strict proof thereof is demanded at trial.

90. Admitted.

91. Admitted. However, as previously stated, Judge Shaw did not have the sole power to impose any sanctions or conditions on J.L. By way of further Answer, J.L. was supervised on a daily basis by the Bradford County Probation Department. By way of further Answer, Judge Shaw remained on the Treatment Court in order to oversee the graduation ceremony for some of the Treatment Court Participants which was scheduled to take place approximately two (2) weeks later.

92. See Answer to #91 above.

93. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 93, and strict proof thereof is demanded at trial.

94. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 94, and strict proof thereof is demanded at trial.

95. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments

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contained in Paragraph 95, and strict proof thereof is demanded at trial.

96. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 96, and strict proof thereof is demanded at trial.

97. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 97, and strict proof thereof is demanded at trial.

98. Admitted.

99. Admitted.

100. Denied. Judge Shaw was never asked about having an affair with D.A. This is corroborated in a Report of Interview of Judge Beirne conducted by Jack Harlacker, an investigator for the Judicial Conduct Board, on August 4, 2015.

101. Admitted.

102. Admitted.

103. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 103, and strict proof thereof is demanded at trial. By way of further Answer, however, a statement to this effect is contained in the same Report of Interview referred to in Answer #100 above.

104. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 104, and strict proof thereof is demanded at trial. By way of

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further Answer, however, a statement to this effect is contained in the same Report of Interview referred to in Answer to #100 above.

105. Denied. After a reasonable investigation, Judge Shaw is without knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 105, and strict proof thereof is demanded at trial.

106. Admitted.

107. Admitted.

108. Admitted in part and denied in part. The response was actually made to the Second Supplemental Notice of Full Investigation.

109. Admitted, with one minor correction. R.K. was an adult probation officer for only a portion of Judge Shaw's term as a Magisterial District Judge.

110. Denied as stated. While it is admitted that Judge Shaw interacted with R.K., he cannot state whether it was on an almost daily basis. By way of further Answer, most of the interaction was by phone. By way of further Answer, this interaction occurred while R.K. and Judge Shaw were members of the Treatment Court, and did not involve his position as a Magisterial District Judge.

111. Admitted.

112. Admitted.

113. Admitted.

114. Admitted.

115. Admitted. It appears from a Report of Interview dated January 14, 2016, by Mr. Harlacker that R.K. received flirtatious text messages.

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116. Admitted. It appears from a Report of Interview dated January 14, 2016, by Mr. Harlacker, that R.K. received flirtatious text messages.

117. Admitted.

118. Admitted.

119. Admitted.

120. Admitted in part and denied in part. It is admitted that at some point, R.K. changed her employment. It is denied, however, that that was the reason that communications between her and Judge Shaw ceased.

121. Admitted.

122. Denied. The allegations are denied, and strict proof thereof is demanded at trial.

123. Admitted.

B. Ex Parte Communications

Treatment Court Participants

124. Admitted in part and denied in part. The allegations contained herein are generally correct; however, it is believed that Participants would actually call the Communications Center, who would then contact the on-call probation officer.

125. Admitted. By way of further Answer, as Judge Shaw was not a probation officer, he would not have been a person to whom calls would be directed.

126. Denied. It is denied that Judge Shaw ever circumvented any policies of the Treatment Court. In addition, Judge Shaw did not give out his telephone number to Treatment Court Participants. However, if a Treatment Court Participant somehow

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got ahold of his telephone number and did contact him, he would, on occasion, converse with them.

127. See Answer to #126 above.

128. Admitted.

129. Denied. Judge Shaw is unclear as to whether this allegation refers to Treatment Court Participants or Treatment Court Staff. However, this was never brought to his attention.

Litigants and Relatives of Litigants

130. Denied. The allegations contained herein are overbroad and unspecific.

Ex Parte Communications from and Response to Employer of Litigant

131. Admitted.

132. Admitted.

133. Admitted. By way of further Answer, A.F.'s summary traffic trial was scheduled for 9:00 a.m. A.F. failed to appear and was found guilty in absencia that day.

134. Admitted.

135. Admitted. By way of further Answer, the text was sent by L.H. after 5:00 p.m. on the date of the hearing, after a decision had been made.

136. Admitted.

137. Admitted.

138. Admitted.

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139. Admitted.

140. Admitted.

Ex Parte Communications to and from Relative of Litigant

141. Admitted.

142. Admitted.

143. Admitted.

144. Admitted.

145. Admitted. By way of further Answer, the truancy elimination plan was done in conjunction with the high school principal.

146. Admitted.

147. Admitted.

148. Admitted.

149. Admitted.

150. Admitted.

151. Admitted. By way of further Answer, the dismissal of the

Truancy case was done with the blessing of the high school principal. In addition, A.W. was placed into the STAR Program as a result of her truancy.

Ex Parte Communications from and Responses to Relative of Litigant

152. Denied. Judge Shaw did not work with W.F. and his sister in a Business-related sense.

153. Denied. The juvenile accountability court was not a formal court.

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Judge Shaw was not "assigned." He volunteered.

154. Admitted, with the exception of the use of the word, "assigned."

155. Admitted.

156. Admitted.

157. Admitted.

158. Admitted.

159. Admitted.

160. Admitted.

161. Admitted.

162. Admitted.

163. Admitted. By way of further Answer, V.F.'s Preliminary Hearing was held at 10:00 a.m., at which time she waived the charges over to Court. The text from W.F. was sent to Judge Shaw at 2:00 p.m. that afternoon.

164. Admitted.

165. Admitted.

166. Admitted.

C. Special Consideration

167. Admitted.

168. Admitted.

169. Admitted in part and denied in part. It is admitted that Judge Shaw would give rides to Treatment Court Participants who needed them. The remaining allegations are denied, and strict proof thereof is demanded at trial.

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170. Admitted.
171. Admitted.
172. See Answer to #124 above.
173. Admitted.
174. See Answer to #126 above.
175. Denied. After a reasonable investigation, Judge Shaw is without

knowledge or information sufficient to form a belief as to the truth of the averments contained in Paragraph 175, and strict proof thereof is demanded at trial.

176. Admitted.
177. See Answer to #129 above.

Litigants and Relatives of Litigants

178. See Answer to #130 above.
179. Admitted.
180. Admitted.
181. Admitted.
182. Admitted.
183. See Answer to #135 above.
184. Admitted.
185. See Answer to #137 above.
186. Admitted.
187. Admitted.
188. Admitted.

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Ex Parte Communications to and from Relative of Litigant

- 189. Admitted.
- 190. Admitted.
- 191. Admitted.
- 192. Admitted.
- 193. Admitted.
- 194. Admitted.
- 195. Admitted.
- 196. Admitted.
- 197. Admitted.
- 198. Admitted.
- 199. See Answer to #151 above.

Ex Parte Communications from and Responses to Relative of Litigant

- 200. See Answer to #152 above.
- 201. See Answer to #153 above.
- 202. See Answer to #154 above.
- 203. See Answer to #155 above.
- 204. See Answer to #156 above.
- 205. See Answer to #157 above.
- 206. See Answer to #158 above.
- 207. See Answer to #159 above.

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208. See Answer to #160 above.
209. See Answer to #161 above.
210. See Answer to #162 above.
211. See Answer to #163 above.
212. See Answer to #164 above.
213. See Answer to #165 above.
214. See Answer to #166 above.

COUNT ONE

IMPROPRIETY AND THE APPEARANCE OF IMPROPRIETY

A. Old Rule

215. Denied. Any allegations of improper conduct on behalf of Judge Shaw are denied, and strict proof thereof is demanded at trial.

216. Admitted.

217. Legal conclusion. No Answer required. To the extent that an Answer is required, it is denied that Judge Shaw's conduct, in any way, violated Rule 2A of the Old Rules governing standards of conduct of Magisterial District Judges.

218. Legal conclusion. No Answer required. To the extent that an Answer is required, it is denied that Judge Shaw's conduct, in any way, violated Rule 2A of the Old Rules governing standards of conduct of Magisterial District Judges.

219. Legal conclusion. No Answer required. To the extent that an

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Answer is required, it is denied that Judge Shaw's conduct, in any way, violated Rule 2A of the Old Rules governing standards of conduct of Magisterial District Judges.

220. Legal conclusion. No Answer required. To the extent that an Answer is required, it is denied that Judge Shaw's conduct, in any way, violated Rule 2A of the Old Rules governing standards of conduct of Magisterial District Judges.

221. Legal conclusion. No Answer required. To the extent that an Answer is required, it is denied that Judge Shaw's conduct, in any way, violated Rule 2A of the Old Rules governing standards of conduct of Magisterial District Judges.

222. Legal conclusion. No Answer required. To the extent that an Answer is required, it is denied that Judge Shaw's conduct, in any way, violated Rule 2A of the Old Rules governing standards of conduct of Magisterial District Judges.

223. Legal conclusion. No Answer required. To the extent that an Answer is required, it is denied that Judge Shaw violated Rule 2A of the Old Rules governing standards of conduct of Magisterial District Judges.

B. New Rule

224. Legal conclusion. No Answer required. To the extent that an Answer is required, it is denied that Judge Shaw violated Canon 1, Rule 1.2 of the

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New Rules governing standards of conduct of Magisterial District Judges.

225. Admitted.

226. Legal conclusion. No Answer required. To the extent that an Answer is required, it is denied that there were any ex parte communications with an employer of a litigant and/or the relatives of litigants, which undermined public confidence in the judiciary.

227. Denied. For the reasons set forth in previous Answers, it is denied that Judge Shaw was required to recuse himself from the cases referred to above, and strict proof thereof is demanded at trial.

228. Denied. For the reasons set forth in previous Answers, it is denied that Judge Shaw engaged in any ex parte communications which were improper or gave the appearance of impropriety.

229. Denied. For the reasons set forth in previous Answers, it is denied that Judge Shaw was required to recuse himself from the cases referenced above, and it is further denied that his conduct was improper or gave the appearance of impropriety.

230. Legal conclusion. No Answer required. To the extent that an Answer is required, any allegations of impropriety are denied, and strict proof thereof is demanded at trial.

231. Legal conclusion. No Answer required. To the extent that an Answer is required, any violations of Special Consideration Clause of Rule 2A are denied, and strict proof thereof is demanded at trial.

232. Admitted.

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233. Denied. It is denied that Judge Shaw's judicial conduct or judgment was improperly influenced. By way of further Answer, Judge Shaw was not in a position to exercise judicial conduct or judgment given the makeup of the Treatment Court and the requirement that the imposition of any penalties required an Order from the President Judge of the Bradford County Court of Common Pleas.

234. Denied. It is denied that any of Judge Shaw's actions resulted in lending prestige of his judicial office to advance any private interest. Further, it is denied that any conduct by Judge Shaw conveyed the impression that J.L.'s girlfriend was in a special position to influence him. For the reasons stated above, it is denied that D.A. was, in fact, the girlfriend of a Treatment Court Participant for much of the time in which it is alleged that Judge Shaw acted improperly.

235. Denied. The allegations fail to allege with particularity that there were any Treatment Court Participants who were involved in obtaining rides.

236. Denied. It is denied that the actions of Judge Shaw did convey or permit others to convey the impression that those Participants were in a special position to influence him.

237. Legal conclusion. No Answer required.

238. Admitted.

239. Denied. For the reasons stated above, the exchange of text messages referred to herein occurred after the matter was adjudicated.

240. Denied. The allegations contained herein do not establish that Judge Shaw permitted his social and community interests or relationships to influence his

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conduct or judgment.

241. Denied. The exchange of text messages occurred after W.F. had waived her right to a preliminary hearing.

242. Legal conclusion. No Answer required.

243. Denied. Any allegations of misconduct are denied, and strict proof thereof is demanded at trial.

C. New Rule

244. Admitted.

245. Denied. For the reasons previously stated, the allegations contained herein are denied, and strict proof thereof is demanded at trial.

246. Denied. For the reasons previously stated, the allegations contained herein are denied, and strict proof thereof is demanded at trial.

247. Denied. For the reasons previously stated, the allegations contained herein are denied, and strict proof thereof is demanded at trial.

248. Legal conclusion. No Answer required.

COUNT THREE

EX PARTE COMMUNICATIONS

A. Old Rule

249. Legal conclusion. No Answer required.

250. Admitted.

251. Admitted in part and denied in part. The factual allegations are admitted. However, there was no proceeding pending before Judge Shaw in his

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capacity as Magisterial District Judge. By way of further Answer, given the nature of Treatment Court, the communications with D.A. were not improper.

252. Admitted in part and denied in part. The factual allegations are admitted. By way of further Answer, see Answer to #251 above.

253. Admitted in part and denied in part. It is admitted that Judge Shaw had ex parte communications with Treatment Court Participants about their issues. It is denied, however, that this was improper. As Treatment Court is an alternative program established by the Court of Common Pleas, Participant's counsel are routinely not included in discussions between Treatment Court Members and Participants. In addition, given the goal of Treatment Court, ex parte communications do, in fact, occur.

254. Legal conclusion. No Answer required.

B. New Rule

255. Legal conclusion. No Answer required.

256. Admitted.

257. Denied. For the reasons previously stated, it is denied that Judge Shaw permitted or considered ex parte communications in making his decision.

258. Denied. Given the nature of the way truancy matters were handled with the high school principal, it is denied that any ex parte communications were considered in making a decision, and strict proof thereof is demanded at trial.

259. Denied. For the reasons previously stated, any communications between Judge Shaw and W.F. occurred after the matter had been in front of Judge Shaw.

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260. Legal conclusion. No Answer required.

COUNT FOUR

FAILURE TO RECUSE

A. Old Rule

261. Legal conclusion. No Answer required.

262. Admitted.

263. Denied. The allegations contained in Paragraph 263 are specifically denied, and strict proof thereof is demanded at trial.

264. Denied. The allegations contained in Paragraph 264 are specifically denied, and strict proof thereof is demanded at trial.

265. Denied. As previously stated, Judge Shaw was not aware that D.A. and J.L. were still romantically involved when he began a texting relationship with her.

266. Admitted. By way of further Answer, it was only recently that Judge Shaw became aware that D.A. and J.L. had reunited. Judge Shaw remained as Treatment Court Judge for only a few weeks thereafter.

267. See Answer to #266 above.

268. Denied. See previous Answers, including but not limited to, Answers to #264, #265, #266 and #267.

269. Legal conclusion. No Answer required.

A. New Rule

270. Legal conclusion. No Answer required.

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271. Admitted.
272. Denied. See previous Answers.
273. Denied. See previous Answers.
274. Denied. See previous Answers.
275. Denied. See previous Answers.
276. Denied. See previous Answers.
277. Denied. See previous Answers.
278. Legal conclusion. No Answer required.

COUNT FIVE

279. Legal conclusion. No Answer required.
280. Admitted.
281. Legal conclusion. No Answer required.
282. Legal conclusion. No Answer required.
283. Legal conclusion. No Answer required.
284. Legal conclusion. No Answer required.

COUNT SIX

285. Legal conclusion. No Answer required.
286. Admitted.
287. Denied. It is denied that any of Judge Shaw's actions prejudiced

the proper administration of justice, and strict proof thereof is demanded at trial.

288. Denied. For the reasons previously set forth, the allegations contained

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herein are denied, and strict proof thereof is demanded at trial.

289. Legal conclusion. No Answer required.

COUNT SEVEN

290. Legal conclusion. No Answer required.

291. Admitted.

292. Legal conclusion. No Answer required. To the extent that an Answer is required, no conduct engaged in by Judge Shaw was extreme nor Brought disrepute upon the judicial office itself.

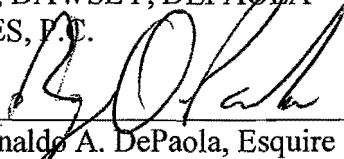
293. Legal conclusion. No Answer required.

WHEREFORE, Magisterial District Judge Michael G. Shaw, respectfully requests a dismissal of the allegations against him.

Respectfully submitted,

GRIFFIN, DAWSEY, DEPAOLA
& JONES, P.C.

BY: _____


Rinaldo A. DePaola, Esquire
Attorney I.D. #37775
101 Main Street
Towanda, Pennsylvania 18848
Telephone: (570) 265-2175

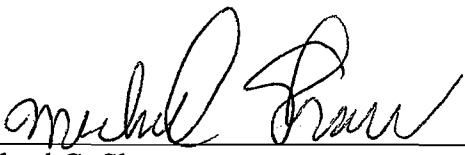
GDDJ

GRIFFIN
DAWSEY
DEPAOLA
JONES, PC

LAW OFFICES
TOWANDA, PA

VERIFICATION

I, MICHAEL G. SHAW, verify that the facts contained in the foregoing Answer to Complaint are true and correct to the best of my knowledge, information and belief. I understand that the statements made in the said Answer to Complaint are made under and subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities.



Michael G. Shaw

Dated: 11/30/16

GDDJ

**GRIFFIN
DAWSEY
DEPAOLA
JONES, PC**

**LAW OFFICES
TOWANDA, PA**