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CLERK OF COURT

BY: \_\_\_\_\_

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7 **IN THE SUPERIOR COURT OF GUAM**  
8 **HAGÁTÑA, GUAM**

9 THOMAS J. FISHER *as Taxpayer,* )

Civil Case No. CV 0137-26

10 Plaintiff, )

11 v. )

12 DOUGLAS MOYLAN, *in his official* )  
13 *capacity as Attorney General of Guam* )  
14 *and in his private capacity.* )

**VERIFIED COMPLAINT**

15 Defendant. )  
16 \_\_\_\_\_ )

17 **COMES NOW** Plaintiff, appearing pro se, and files a Complaint in the  
18 above-captioned case:

19 **GENERAL ALLEGATIONS AND JURISDICTION**

20 1. This Court has jurisdiction over this matter pursuant to 7 GCA § 3105  
21 and 5 G.C.A. § 7103 et seq.

22 2. Plaintiff Thomas J. Fisher is a taxpayer and resident of Ipan, Talofof, )  
23 Guam. 5 Guam Code Ann. §7103 states, "Any taxpayer who is a resident of Guam )  
24 shall have standing to sue the government of Guam and any officer, agent, )  
25

1 contractor, or employee of the Executive Branch of the government of Guam for  
2 the purpose of enjoining any officer, agent, contractor, or employee of the  
3 Executive Branch of the government of Guam from expending money without  
4 proper appropriation, without proper authority, illegally, or contrary to law . . . .”

5 Accordingly Plaintiff has standing to sue.

6  
7 3. Upon information and belief and at all times relevant to this  
8 Complaint, Defendant Moylan was the Attorney General of Guam, an employee  
9 of the Executive Branch of the Government of Guam and had and has  
10 responsibility for the expenditure of funds belonging to the Territory of Guam. As  
11 such, Defendant Moylan stands in a fiduciary relationship with the people of  
12 Guam regarding the management of public money. *See 5 Guam Code Ann.*  
13 *§7102.*

14  
15 4. Although required to do so by law, Defendant Moylan did not  
16 discharge his duties with respect to the management of public money solely in the  
17 interest of the people of the Territory of Guam.

18  
19 5. Although required to do so by law, Defendant Moylan did not  
20 discharge his duties with the care, skill, prudence and diligence under the  
21 circumstances that a prudent person acting in like capacity and familiar with such  
22 matters would use in the conduct of an enterprise of like character and with like  
23 aims.  
24  
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1           13. On or about the second week of March 2026, Defendant caused to be  
2 constructed, and expended public funds to do so, several billboards containing a  
3 message advancing Abrahamic religious belief<sup>1</sup>. *See attachment A.*

4  
5           14. The message, complete with an image of the late motion picture actor  
6 Charlton Heston as the prophet Moses (*see The Ten Commandments, Paramount*  
7 *Pictures Corporation, Los Angeles Ca., 1956*), urges “criminals” to repent,  
8 reform and respect” and is part of Mr. Moylan’s “Criminal Redemption Project”.

9  
10           15. The billboards contain both a dove (a Christian symbol representing  
11 the Holy Spirit and a Judaic symbol of peace and purity) and a depiction of the  
12 Decalogue or Ten Commandments. These Commandments are widely understood  
13 in Abrahamic religious beliefs to be directives resulting from a covenant given  
14 by God to the prophet Moses<sup>2</sup>.

15  
16           16. Also featured in the billboard is a caricature of the Ark of the  
17 Covenant. In Abrahamic belief, the Ark is a cedar chest containing the tablets  
18 upon which the Decalogue was written and symbolizes God’s presence among us.

19  
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21  
22 <sup>1</sup> The term *Abrahamic religions* (and its variations) is a collective religious  
23 descriptor for elements shared by Judaism, Christianity, and Islam.

24 <sup>2</sup> Paradoxically, some may feel the billboards to be blasphemous since the  
25 recitation of the Decalogue alters what for some is a received word of God.

1 Floating above the Ark, and providing an *imprimatur*, is the symbol of the  
2 Attorney General of Guam.

3  
4 17. The Decalogue, the Dove, and the depiction of Moses are religious in  
5 nature and collectively in the form Mr. Moylan presents, religious, non-private  
6 speech with no secular context.

7  
8 18. Mr. Moylan's billboards are paid for with public funds and advance a  
9 public, non-private attempt to proselytize a religious belief at public expense.

10 19. This action by the Attorney General is impermissible under both the  
11 Establishment Clause of the United States Constitution and the Supreme Court's  
12 instruction in *Kennedy v. Bremerton Sch. Dist.*, 597 U.S. 507 (2022) and 48 USCA  
13 §1421(b)(p).  
14

15  
16 **CAUSE OF ACTION:  
ILLEGAL EXPENDITURES**

17 20. Complainant incorporates by reference and realleges those things  
18 stated and alleged in paragraphs 1 through 19, *supra*.

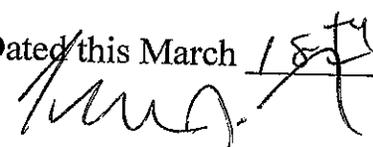
19  
20 21. Upon information and belief, Mr. Moylan controls monies allotted to  
21 the Office of the Attorney General.

22 22. Money allotted to the Office is generated from taxes levied against the  
23 People of Guam and is done so for public purposes.  
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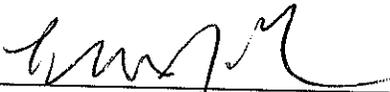
- appropriation, without proper authority, illegally, or contrary to law;
3. That the Court issue judgment against Defendant and in favor of the Plaintiff and Government of Guam for the return to the Government of Guam of any money which has been expended improperly and in an amount to be proven at trial.
  4. For pre-judgment and post-judgment interest at the legal rate;
  5. For reasonable attorney's fees and costs of suit incurred in the prosecution of this action pursuant to 5 G.C.A. § 7112.
  6. That the Court not order Plaintiff post bond, and
  7. For such other and further relief as this Court may deem just and proper.

Dated this March 18<sup>th</sup>, 2026.  
  
Thomas J. Fisher

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**VERIFICATION**

I, Thomas J. Fisher of Ipan, Talofofo, Guam, swear or affirm pursuant to the laws of perjury that I am the Plaintiff herein and that the allegations made are true based upon personal knowledge and information or belief.

  
\_\_\_\_\_  
Thomas J. Fisher



# REPENT, REFORM & RESPECT.

I  
Thou shalt not kill

II  
Thou shalt not steal

III  
Thou shalt honor thy father  
& mother

IV  
Thou shalt not commit  
adultery

V  
Thou shalt love thy neighbor  
as thyself



VI  
Thou shalt not commit crimes

VII  
Thou shalt not take meth

VIII  
Thou shalt seek amends from  
thy victim

IX  
Thou shalt get an education

X  
Thou shalt respect one  
another

Coming Soon

## AG Moylan's Criminal Redemption Project



QUINTANILLA 03/02/28  
MARK JAMES  
SABLAN

### II. Thou shalt not steal

