

CHRIS DEROSE
Clerk of the Superior Court
By Jessica Bernal, Deputy
Date 10/12/2018 Time 12:30:22

Jennifer M Harrison, *Pro Per*

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Description	Amount
Lesa Anone, <i>Pro-Per</i> CASE# CV2018-006623	
NEW COMPLAINT	333.00
TOTAL AMOUNT	333.00
Receipt# 26848969	

Jeremy Bronaugh, *Pro Per*

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Russell Jaffe, *Pro Per*

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Arizona Superior Court
Maricopa County

Jennifer Harrison, Lesa Antone, Russell Jaffe, Jeremy Bronaugh (Individuals) Plaintiffs, VS Katie Hobbs (Individual) Defendant	Case Number: CV2018-006623 COMPLAINT
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Plaintiffs Jennifer M Harrison ("Harrison"), Lesa Antone ("Antone"), Russell Jaffe ("Jaffe") and Jeremy Bronaugh ("Bronaugh") hereby complain and for causes of action allege as follows.

1. Plaintiffs are individuals and are now, and at all times mentioned in this complaint, residents of Maricopa County, Arizona.
2. Plaintiffs are individual, private citizens and constituents of Maricopa County, Arizona. Plaintiff Harrison resides in Peoria, Arizona and works as a licensed real estate agent. Plaintiff Antone resides in Litchfield Park, Arizona and is retired. Plaintiff Bronaugh lives in Goodyear, Arizona and is self-employed. Plaintiff Jaffe resides in Litchfield Park, Arizona and works in the healthcare profession. Plaintiffs have in the past enjoyed a good

reputation, both generally and in their profession, specifically Harrison in the real estate profession and Jaffe in the healthcare profession.

3. Defendant Katie Hobbs ("Hobbs") is an individual, and is now and at all times mentioned in this complaint a resident of Maricopa County, Arizona. Hobbs is a married woman.
4. Defendant Hobbs was the former 'Senate Minority Leader' for the Arizona State Senate while committing the offense listed in this complaint and is the current candidate for Secretary of State in the State of Arizona.
5. On April 29, 2018, defendant Hobbs maliciously tweeted a photo of the Plaintiffs, while representing herself as the Senate Minority Leader for the Arizona State Senate, on Twitter. Pictured in the photograph was Plaintiff Harrison, Harrison's spouse, Plaintiff Antone, Plaintiff Bronaugh, Plaintiff Jaffe and and Governor Doug Ducey while Plaintiffs were attending the 'Mohave County Republican Committee's Patriot Dinner' in Mohave County, Arizona. While candidly posed for the photograph, Plaintiff Antone made an "AOK" hand gesture in the group photograph. Defendant Hobbs did not attend this event and it is unknown to the Plaintiffs how Hobbs obtained this photo. Defendant Hobbs posted the Plaintiff's photo on her public Twitter, while representing herself as the Senate Minority Leader of the Arizona State Senate, and captioned the photo of the Plaintiffs as follows: **"Governor Ducey, I hope you realize this woman is flashing a white supremacist sign. These are part of the group that shows up at the Capitol w/ AR-15's and harass elementary school children and democratic staff, calling them illegals. You must denounce"**.
6. Defendant Hobbs maliciously and intentionally published a false, libelous statement about Plaintiffs, knowing the statement was false or acted in reckless disregard for the truth as a public figure. As the State Senate Minority Leader, Hobbs has an implied perceived credibility in the community and this comes with the responsibility to act in good faith towards honest discourse on all platforms. Instead, Defendant Hobbs acted recklessly in using social media to make intentional, libelous, defamatory comments about the Plaintiffs, whom are private citizens, in an attempt to smear Governor Ducey and advance Defendant Hobbs' political agenda. Defendant Hobbs wanted to portray to her social media audience that Governor Ducey was posing with "white supremacists". This is precisely the false story that Defendant Hobbs implied to her audience and to the media when she stated "This woman is flashing a white supremacist sign".

7. The defamatory tweet referred to the Plaintiffs; included the Plaintiff's photograph; was made of and concerning Plaintiffs; and was so understood by those who read the tweeted statement and photo. The false statement and photo was then retweeted 245 more times by 245 separate individuals making the false statement and photo go viral.
8. Defendant Hobbs tagged and notified Arizona Republic/AZ Central reporter, Richard Ruelas (@Ruelaswritings) in the defamatory tweet, sequentially causing Plaintiff's photo with false "white supremacy" story to be published in articles and aired over all local television news channels for two days in Arizona. Plaintiff's photo and false white supremacy story was on the front page of the Arizona Republic newspaper, distributed throughout the community.
9. The entire statement that 'Plaintiffs were flashing a white supremacist hand gesture; that Plaintiffs showed up at the Capitol with AR-15 weaponry; that Plaintiffs harassed elementary school children and that Plaintiffs called democratic staff illegals' is false as it pertains to the Plaintiffs.
10. The tweet is libelous on its face. It clearly exposes Plaintiffs to hatred, contempt, ridicule, loss of business, termination of employment, death threats and obloquy because Plaintiffs are not white supremacists, nor is the AOK hand gesture any type of secret white supremacy hand gesture. The Plaintiffs have not carried AR-15 weaponry to the Arizona Capitol. The Plaintiffs have never harassed elementary school children and the Plaintiffs have not called democratic staff illegal.
11. The libelous statement made by Defendant Hobbs, including the Plaintiff's photograph, was seen and read on or about April 29, 2018 by hundreds of thousands of Arizona residents on social media, print and on local television news. With the ongoing Arizona State elections, the photo and false statements are still circulating in further attempts to smear Governor Ducey during his re-election for Governor, exposing Plaintiffs to further ridicule.
12. As a direct result of Defendant Hobbs publishing such false statements on social media and the slanderous story going viral, the angry readers of this fictitious story published Plaintiff's personal and business information online, exposing their home addresses and places of employment trying to "expose the white supremacists" - as Hobbs has made them believe.
13. As a proximate result of the above described publication, Plaintiff Harrison has suffered termination and loss of employment, damage to reputation, defamation of character,

emotional distress, anxiety and fear, humiliation, shame, mortification, threats to personal and family safety and financial loss. Plaintiff Harrison received numerous harassing calls and messages to her broker, stating that Harrison is a "white supremacist". Harrison's broker asked her to leave the brokerage as a direct result of the bad publicity and ongoing phone calls and messages to the brokerage. Harrison incurred loss of wages and was forced to join another brokerage, incurring more marketing costs with new brokerage information on materials pertinent to Harrison's profession. As a proximate result of the above described publication, Plaintiff Antone's personal home address was published online and Antone was forced to install a home security system due to strangers knocking on her door and death threats to her family, calling Antone a white supremacist. Plaintiff Antone has suffered damage to reputation, defamation of character, emotional distress, anxiety and fear, humiliation, shame, mortification, threats to personal and family safety. As a proximate result of the above described publication, Plaintiff Jaffe has suffered damage to reputation, defamation of character, emotional distress, anxiety and fear, humiliation, shame, mortification, threats to personal and family safety. Plaintiff Jaffe was ridiculed at work, reprimanded by his employer and his position in the company was threatened and hangs in jeopardy. As a proximate result of the above described publication, Plaintiff Bronaugh has suffered loss of employment, damage to reputation, defamation of character, emotional distress, anxiety and fear, humiliation, shame, mortification, threats to personal and family safety. Plaintiff Bronaugh was a member of a sports syndicate affiliated with the Arizona Cardinals Football Team called "The Bird Gang" and was asked to step away from the organization when his photo was aired on local news and he was slandered as a "white supremacist". The Plaintiffs ask the court for \$20,000.00 in compensatory damages.

14. The above described publication was not privileged because it was published by Defendant Hobbs with malice, hatred, ill will and the desire to injure Plaintiffs by smearing the Governor to advance a political agenda by swaying public opinion of the Governor's recent political policy. Because of Defendant Hobbs' malice in publishing and requesting AZCentral/AZ Republic to publish, Plaintiffs seek punitive damages in the total amount of \$20,000.00, or a total amount to be established by the court.

Arizona Defamation & Libel Law

Libel: the written or published communication of a false assertion of fact to a third-party, which subsequently results in harm or damage to another's reputation.

A statement that brings a plaintiff into disrepute, contempt, or ridicule, or impeaches a Plaintiff's honesty, integrity, virtue or reputation.

Whether a statement is considered defamatory or not is determined by the "natural and probable effect a reading of the entire statement, in context, would have on the mind of the average reader".

Four elements of defamation under Arizona State Law:

1. Defendant made, said or wrote a false statement of fact;
2. Statement was communicated to a third party;
3. Statement caused material harm to Plaintiffs;
4. At the time the statement was made, the Defendant knew the statement was false or acted in reckless disregard for the truth and/or was negligent in determining the truth

WHEREFORE, Plaintiffs demand judgment against Defendant for:

1. Compensatory damages;
2. Punitive damages;
3. Interest allowed by law;
4. Cost of suit and
5. Such other and further relief as this court may deem just and proper.

Dated: 10/11/2018

Plaintiff Jennifer Harrison Jennifer Harrison

Dated: 10/11/2018

Plaintiff Lesa Antone Lesa Antone

Dated: 10/11/2018

Plaintiff Jeremy Bronaugh Jeremy Bronaugh

Dated: 10/11/2018

Plaintiff Russell Jaffe Russell Jaffe

EXHIBIT A



Thread



Katie Hobbs
@katiehobbs



Governor @dougducey I hope you realize this woman is flashing a white supremacist sign. These are part of the group that shows up at the Capitol w/AR-15's and harass elementary school children and democratic staff, calling them illegals. You must denounce!



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