



**IN THE CIRCUIT COURT OF
MONTGOMERY COUNTY, ALABAMA**

LEIGH CORFMAN,

Plaintiff,

vs.

**ROY S. MOORE, and
JUDGE ROY MOORE FOR US SENATE,**

Defendants.

CIVIL ACTION NO. _____

COMPLAINT

Leigh Corfman, a resident of Etowah County, Alabama, alleges:

INTRODUCTION

1. Since November 2017, Defendants Roy Moore and his campaign committee, Judge Roy Moore for US Senate (the “Moore Campaign Committee”), have defamed Ms. Corfman, repeatedly and in all forms of media, calling her a liar and questioning her motivation for publicly disclosing that Mr. Moore sexually abused her in 1979 when she was a 14-year-old high school freshman and he was a 32-year-old assistant district attorney.

2. Nor have these defamatory statements stopped with the Senate election on December 12, 2017. On December 27, 2017, Mr. Moore filed a lawsuit in this Court in which he characterized Ms. Corfman’s account of the sexual abuse as “false and malicious.” As before the election, the Moore Campaign Committee supported and echoed Mr. Moore’s attacks. Mr. Moore and the Moore Campaign Committee will likely continue to defame Ms. Corfman if they are not stopped by this Court.

3. The defamatory attacks began when Ms. Corfman recounted to *The Washington Post* that she met Mr. Moore in February 1979, when she and her mother were at the Etowah County courthouse for a child custody hearing. Mr. Moore approached them and volunteered to sit with Ms. Corfman outside the courtroom while her mother attended the hearing. With Ms. Corfman's mother occupied with court proceedings, Mr. Moore asked Ms. Corfman what school she attended and her grade and, at the end of their conversation, for her telephone number.

4. Mr. Moore shortly thereafter called Ms. Corfman and arranged to meet her.

5. On two occasions, Mr. Moore picked up Ms. Corfman near her home and drove her to his house, where they were alone.

6. On the second visit to the house, Mr. Moore sexually abused Ms. Corfman. He provided Ms. Corfman with alcohol, flattered her, laid blankets and pillows on the floor, and took off her and his outer clothing. Wearing only undershorts, Mr. Moore touched Ms. Corfman's private parts through her bra and underpants and guided her hand to touch his penis. Ms. Corfman resisted Mr. Moore and asked him to take her home.

7. Ms. Corfman immediately told friends, including Betsy Davis, about Mr. Moore's conduct that night.

8. Ms. Corfman over the years also told family members, including her mother.

9. Until Fall 2017, Ms. Corfman did not disclose her experience with Mr. Moore beyond friends and family because of fear of retaliation and other personal circumstances, including a desire to protect her children.

10. Ms. Corfman's public silence ceased when *The Washington Post* approached her in the fall of 2017 and questioned her about Mr. Moore. Ms. Corfman responded truthfully to the reporter's questions.

11. On November 9, 2017, *The Washington Post* published an article entitled, *Woman says Roy Moore initiated sexual encounter when she was 14, he was 32*.¹

12. In addition to reporting on Ms. Corfman's experience with Mr. Moore, the article discussed three other women—Gloria Thacker Deason, Debbie Wesson Gibson, and Wendy Miller—who recounted Mr. Moore's pursuit of them when they were between the ages of 16 and 18 and he was in his early 30s. *Id.*

13. Following publication of the article, five additional women publicly accused Mr. Moore of sexual misconduct or sexual behavior with teenaged girls: Becky Gray; Tina Johnson; Beverly Young Nelson; Gena Richardson; and Kelly Harrison Thorp.

14. Mr. Moore issued a written statement published in the same *Washington Post* article that accused Ms. Corfman (and the other women) of lying and stated that their accounts were politically motivated: "These allegations are completely false and are a desperate political attack by the National Democrat Party and the Washington Post on this campaign." *Id.*

15. On November 28, 2017, after repeated attacks by Mr. Moore and the Moore Campaign Committee, Ms. Corfman sent Mr. Moore an open letter and asked him to stop denying his sexual abuse of her in 1979, to acknowledge his misconduct, and to apologize.

¹ See Stephanie McCrummen, Beth Reinhard and Alice Crites, *Woman says Roy Moore initiated sexual encounter when she was 14, he was 32*, WASH. POST (Nov. 9, 2017), https://www.washingtonpost.com/investigations/woman-says-roy-moore-initiated-sexual-encounter-when-she-was-14-he-was-32/2017/11/09/1f495878-c293-11e7-afe9-4f60b5a6c4a0_story.html [<https://perma.cc/GV22-BJZQ>] (last visited Jan. 3, 2018).

16. Mr. Moore refused to do so. Instead, Mr. Moore continued his attacks, accusing Ms. Corfman of lying and having improper purposes. He made these statements at campaign rallies, in interviews, on the internet, on the radio, on television, and in newspapers. Mr. Moore has claimed, among other assertions, that Ms. Corfman's account is "completely false," "malicious," "politically motivated," that it reflects "the immorality of our time," and that "there is not one ounce of truth in her accusations."

17. On December 27, 2017, Mr. Moore and the Moore Campaign Committee filed a lawsuit seeking to enjoin the Alabama Secretary of State from certifying the results of the special election for the United States Senate on the basis of alleged election fraud.

18. Without any relevance to his claims of election fraud or to the relief that he is seeking, Mr. Moore used this platform to attack Ms. Corfman and two other women. Specifically, Mr. Moore filed an affidavit in which he claims that, after the election on December 12, 2017, he took a polygraph examination concerning "allegations of sexual misconduct" made against him "by Leigh Corfman, Beverly Nelson, and Tina Johnson."

19. Mr. Moore's affidavit does not identify the individual who administered the alleged polygraph examination, the date on which it was administered, the questions asked, or the answers given; nor does the affidavit explain why Mr. Moore waited until after the election to submit to a test.

20. Mr. Moore's affidavit also omits mention of the other women who publicly disclosed their experiences with him and who he likewise claims never to have met, including Ms. Deason, Ms. Gibson, Ms. Gray, Ms. Miller, Ms. Richardson, and Ms. Thorp.

21. Mr. Moore's affidavit states that the polygraph examination "reflected that I did not know, nor had I ever had any sexual contact with, any of these individuals"—Ms. Corfman, Ms. Nelson, and Ms. Johnson—and that their accounts are "false and malicious."

22. Mr. Moore's statements about Ms. Corfman, including those in his affidavit made under penalty of perjury, are false and defamatory.

23. Mr. Moore made these statements knowing that they are false.

24. Alternatively, if Mr. Moore does not remember Ms. Corfman—including perhaps because he pursued other minors and teenagers when he was in his 30s—he made these false statements with reckless disregard of their truth.

25. As set forth below, the Moore Campaign Committee also wrongfully attacked and otherwise defamed Ms. Corfman, repeating the same falsehoods as Mr. Moore and at times embellishing them.

26. The Moore Campaign Committee either knew that its statements about Ms. Corfman are false or made them with reckless disregard for their truth or falsity.

27. Mr. Moore's and the Moore Campaign Committee's baseless and irresponsible attacks against Ms. Corfman have caused her emotional and economic harm.

28. Following the lead of Mr. Moore and the Moore Campaign Committee, members of the public have attacked Ms. Corfman and published these and similar false comments about her: "Paid Lying Whore"; "#LeighCorfman was a 14 year old whore. #FakenewsCNN at its best. #JudgeRoyMoore #MAGA"; and "Corfman is one big liar."

29. As a result of Defendants' defamatory statements about her, Ms. Corfman took a temporary leave of absence from her job without compensation, directly resulting in lost wages.

30. Despite Defendants' defamatory statements to the contrary, Ms. Corfman has not received any compensation, from *The Washington Post* or from any other source, for disclosing Mr. Moore's sexual abuse of her when she was 14 years old.

31. Nor did Ms. Corfman make this disclosure at the behest of any political organization or campaign.

32. Ms. Corfman is a private citizen whose only motivation is to clear her name and to stop Mr. Moore and the Moore Campaign Committee from continuing their defamatory attacks on her. Ms. Corfman wishes that Defendants had heeded her requests to cease their defamation of her and seeks judicial intervention as a last resort to hold Defendants accountable for their misconduct, including a declaration that Defendants' denials of Mr. Moore's sexual abuse of her and their characterization of her account of this abuse as "false," "malicious," and "immoral," among other untrue statements, are defamatory, as well as injunctive relief against these statements. Mr. Moore and the Moore Campaign Committee will likely continue their defamation of Ms. Corfman unless this Court orders them to stop.

THE PARTIES

33. Ms. Corfman is over the age of 19 years old and resides in Gadsden, Alabama.

34. Mr. Moore, former Chief Justice of the Alabama Supreme Court and former candidate for the United States Senate, is over the age of 19 years old and resides in Gallant, Alabama. Mr. Moore is a named plaintiff in a lawsuit filed December 27, 2017 in this Court.

35. The Moore Campaign Committee is a campaign committee established under the rules of the Federal Election Commission to finance the campaign of Roy Moore for election to the United States Senate. The Moore Campaign Committee has a mailing address of P.O. Box 5032, Montgomery, Alabama 36103, and does business in or has a branch in

Montgomery County, or both. The Moore Campaign Committee is a named plaintiff in a lawsuit filed December 27, 2017 in this Court.

FACTUAL ALLEGATIONS

A. Mr. Moore's Sexual Abuse of Ms. Corfman in 1979

36. In 1979, Ms. Corfman was 14 years old; Mr. Moore was 32 years old and working as an assistant district attorney in Etowah County, Alabama.

37. As described above, Mr. Moore approached Ms. Corfman at the Etowah County courthouse in February 1979, secured Ms. Corfman's telephone number, and arranged to meet her on two separate occasions.

38. Ms. Corfman told Mr. Moore at the time that she was 14 years old.

39. After Mr. Moore sexually abused Ms. Corfman during the second visit to his home, as described above, she resisted further contact with Mr. Moore. When Mr. Moore telephoned Ms. Corfman again, she refused to meet him.

40. Ms. Corfman told friends about Mr. Moore's conduct immediately after the abuse. One friend, Ms. Davis, recalls her describing an encounter in which the older man wore nothing but tight white underwear. *Id.*² Another friend remembers Ms. Corfman talking about seeing an older man named Roy Moore when they were teenagers.³

² See also *Friend of Roy Moore accuser speaks out*, CNN.COM, <http://www.cnn.com/videos/politics/2017/12/10/betsy-davis-friend-of-moore-accuser-tuchman-pkg-newday-weekend.cnn> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 1).

³ See Stephanie McCrummen, Beth Reinhard and Alice Crites, *Woman says Roy Moore initiated sexual encounter when she was 14, he was 32*, WASH. POST (Nov. 9, 2017), https://www.washingtonpost.com/investigations/woman-says-roy-moore-initiated-sexual-encounter-when-she-was-14-he-was-32/2017/11/09/1f495878-c293-11e7-afe9-4f60b5a6c4a0_story.html [<https://perma.cc/GV22-BJZQ>] (last visited Jan. 3, 2018).

41. Later, Ms. Corfman told family members about Mr. Moore. First, in the mid-1990s, Ms. Corfman told her mother about her experience with Mr. Moore. Later, but before being approached by *The Washington Post*, Ms. Corfman told other family members about Mr. Moore's misconduct.

B. Mr. Moore's False Attacks on Ms. Corfman

42. Since publication of the *Washington Post* article on November 9, 2017, Mr. Moore has repeatedly attacked Ms. Corfman despite knowing that he sexually abused Ms. Corfman when she was 14 years old. At a minimum, Mr. Moore made his false denials with reckless disregard of the truth.

43. Mr. Moore has not stopped denigrating Ms. Corfman or prioritizing his political ambitions over the truth. To the contrary, he has sought out the broadest of public forums to impugn Ms. Corfman.

44. Mr. Moore's statements in paragraphs 47-73 below are defamatory. They are false and have damaged Ms. Corfman, including by imputing dishonesty and corruption to her. Mr. Moore knew or should have known that they were false when he made them.

45. On November 10, 2017, the day after publication of the *Washington Post* article, Mr. Moore appeared on *The Sean Hannity Show*, a nationally syndicated radio program, to disclaim knowledge of Ms. Corfman. A portion of the segment featuring Mr. Moore was re-broadcast with transcription on the Fox News Channel, a nationally distributed cable television channel.⁴

⁴ See *Hannity Presses Roy Moore on Sexual Misconduct Allegations*, INSIDER.FOXNEWS.COM (Nov. 10, 2017, 10:00 PM), <http://insider.foxnews.com/2017/11/10/sean-hannity-interview-judge-roy-moore-over-sexual-misconduct-allegations> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 2).

46. Tellingly, Mr. Moore initially suggested to Mr. Hannity that he “dated a lot of young ladies,” including teenage girls, when Mr. Moore was in his 30s, and stated with regards to these allegations, including Ms. Corfman’s: “I’m not going to dispute anything, but I don’t remember anything like that.” *Id.*

47. Mr. Moore later in the same interview denied knowing Ms. Corfman, and accused her of political motivations in speaking with *The Washington Post*: “I don’t know Ms. Corfman from a-anybody. I, I’ve never talked to her, never had any contact with her. Allegations of sexual misconduct with her are completely false. I believe they’re politically motivated. I believe they’re brought only to stop a very successful campaign, and that’s what they’re doing. Uh, I’ve never, uh, known this woman or anything.” *Id.*

48. Mr. Moore made similar false claims later in the same radio interview: “They’re bringing it up because it’s political, it’s a direct attack on this campaign and it involves a fourteen-year-old girl, which I would have never had any contact with; nothing with her mother or any courthouse or anywhere else would I have done that.” *Id.*

49. Later in the same interview, Mr. Moore stated that Ms. Corfman waited “40 years to bring up something like this,” despite *The Washington Post* having published interviews of Ms. Corfman’s friends, who confirmed that she told them contemporaneously of her experience with Mr. Moore. Mr. Moore told Mr. Hannity: “I never knew this woman. I never met this woman and these charges are politically motivated They are bringing up something to detract from this campaign and they know what they’re doing and they got me obviously on the radio hearing things about a sexual encounter that never happened. . . . This never happened and

they know it never happened and obviously, you don't wait 40 years to bring up something like this.”⁵

50. On November 11, 2017, in a video-broadcast campaign speech to the Mid-Alabama Republican Club in Vestavia Hills, Alabama, Mr. Moore described Ms. Corfman's account as “completely false and untrue.”⁶

51. On November 12, 2017, in a campaign speech in Huntsville, Alabama broadcast and archived on Facebook, Mr. Moore again claimed, in reference to Ms. Corfman, that accounts he was “involved with a minor child are completely unfalse [*sic*] and untrue.”⁷ Mr. Moore stated in reference to the *Washington Post* report as a whole that “[t]his article is a prime example of fake news.” *Id.*

52. On November 15, 2017, Mr. Moore published “An Open Letter to Sean Hannity” on his campaign Facebook page in which he stated: “I adamantly deny the allegations of Leigh Corfman.”⁸

53. On November 16, 2017, at a news conference in Birmingham, Alabama, broadcast and archived on Facebook, Mr. Moore again disputed Ms. Corfman's truthful account

⁵ Transcript of *Awaiting President Trump's Arrival at APEC Summit With World Leaders in Vietnam; Hannity Interviewed Judge Moore On His Radio Show Earlier*, FOX NEWS CHANNEL, 2017 WLNR 35282599 (transcript of Nov. 10, 2017 program; transcript published Nov. 11, 2017).

⁶ See AL.com YouTube Account, *Roy Moore in Vestavia*, YOUTUBE.COM (Nov. 11, 2017), <https://www.youtube.com/watch?v=Ru15MRh9dbA> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 3).

⁷ See Judge Roy Moore for U.S. Senate, *Speaking tonight in Huntsville*, FACEBOOK.COM (Nov. 12, 2017, 8:21 PM), <https://www.facebook.com/JudgeRoyMoore/videos/700610830137151/> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 4).

⁸ Roy S. Moore, *An Open Letter to Sean Hannity*, FACEBOOK.COM (Nov. 15, 2017, 4:12 PM), <https://www.facebook.com/JudgeRoyMoore/posts/702139529984281> [<https://perma.cc/4ZHK-Y743>] (last visited Jan. 3, 2018).

of his sexual abuse of her and incorrectly claimed that there was no corroborating evidence: “As you know, the *Washington Post* has brought some scurrilous, false charges, not charges, allegations, which I have emphatically denied time and time again. They’re not only untrue, but they have no evidence to support them.”⁹

54. In a November 21, 2017 article published by AL.com, Mr. Moore again accused Ms. Corfman of lying and denied knowing her: “I adamantly deny the allegations of Leigh Corfman. I do not know her, nor have I ever known her, and there is not one ounce of truth in her accusations. Furthermore, I have never dated or engaged in any inappropriate conduct with an underage girl.”¹⁰

55. The same day, during an appearance on *Scott Beason’s “Reality Check,”* a program on Alabama Cable Network, Mr. Moore repeated his denials: “I didn’t know, um, Leigh Corfman. And, uh, I-I never dated, uh, underage women, and I never engaged in sexual misconduct with anybody.”¹¹

56. On November 27, 2017, at a campaign rally broadcast and archived on Facebook and other media outlets, Mr. Moore denied knowing Ms. Corfman and accused her of malice and immorality: “These allegations are completely false, they’re malicious. Specifically, I do not know any of these women, nor have I engaged—have I ever engaged—in sexual misconduct

⁹ Fox News Channel Facebook Account, *Republican Senate candidate Roy Moore speaks at a ‘Faith Leaders Press Conference’ in Birmingham, Alabama*, FACEBOOK.COM (Nov. 16, 2017, 12:30 PM), <https://www.facebook.com/FoxNews/videos/10156296603941336/> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 5).

¹⁰ Cameron Smith, *A defiant Roy Moore answers tough questions: ‘I will never give up.’*, AL.COM (Nov. 21, 2017, 9:30 AM), http://www.al.com/opinion/index.ssf/2017/11/roy_moore_responds_defiantly_t.html [<https://perma.cc/FS5U-AVJ6>] (last visited Jan. 3, 2018).

¹¹ Scott Beason Media, *Roy Moore & Scott Beason 11/21/2017*, YOUTUBE.COM (Nov. 23, 2017), <https://www.youtube.com/watch?v=vDgeyL5Ct4o> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 6).

with any woman. As a former judge and prosecutor, I know the seriousness of charges like this and they should be serious, if it happens. When a young lady is abused, and I've represented many victims in cases such as this, I have not seen one who wants her picture posted on national TV, especially in a political advertisement. The truth is, this is not really odd at all, this is simply dirty politics, and it's a sign of the immorality—it's a sign of the immorality of our time."¹²

57. On November 29, 2017, in a campaign speech broadcast and archived on Facebook, Mr. Moore attacked Ms. Corfman's account of sexual abuse as false and malicious and accused her of participating in a liberal conspiracy: "They've done everything. When I say they, who are they? They're liberals, they don't want conservative values. They're the lesbian, gay, bisexual, transgender, who want to change our culture. They're socialists who want to change our way of life, putting man above God, and that government is our god. . . . Attacks have been not only false and numerous, but malicious."¹³

58. In that same speech, Mr. Moore repeated his denial of Ms. Corfman's account and questioned her motivation in coming forward: "Let me state once again, I do not know any of these women, did not date any of these women, have not engaged in any sexual misconduct with anyone. This is not only 'odd,' that things like this occur, it's simply dirty politics." *Id.*

¹² WHNT News 19 Facebook Account, *WATCH LIVE: Roy Moore is set to make the keynote speech at a rally in DeKalb County*, FACEBOOK.COM (Nov. 27, 2017, 4:02 PM), <https://www.facebook.com/whntnews19/videos/10155190769206045/> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 7).

¹³ See Judge Roy Moore for U.S. Senate, *Judge Moore speaks at Magnolia Springs Baptist in Mobile County!*, FACEBOOK.COM (Nov. 29, 2017), <https://www.facebook.com/JudgeRoyMoore/videos/708219586042942/> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 8).

59. Mr. Moore in the speech also described Ms. Corfman’s account as a “fable”: “If you’ll remember what Paul said: ‘The time will come when they will not endure sound doctrine, but after their own lusts shall they heap to themselves teachers, having itching ears; and they will turn away their ears from the turf—truth and shall be turned to fables.’ You see, we’re quick to jump on fables, without any proof, without anything but somebody saying something. And that’s what we’ve done. Welcome to the world of the twenty-first century politics.” *Id.*

60. In an interview on December 10, 2017 with Bill Britt on *The Voice of Alabama Politics*, Mr. Moore continued to claim that he did not know Ms. Corfman or any of the other women who publicly disclosed their experiences with Mr. Moore when they were teenagers: “I do not know them, I had no encounter with them. I never molested anyone, and for them to say that—I don’t know why they’re saying it but it’s not true.”¹⁴

61. Mr. Moore in that same interview repeated his denials: “I said I did not know any of the women who have charged me with sexual allegation of molestation, and I did not know any of the women. When I saw these pictures on the advertisements of my opponent, I did not recognize any of those people, I did not know them. . . . But these allegations are completely false. I did not date underage women. I did not, uh, molest anyone. And so these allegations are false.” *Id.*

62. At a campaign rally on December 11, 2017, Mr. Moore characterized Ms. Corfman’s account as “fake news” and questioned her motivations: “The fake news began after I was an eleven-point lead in the general election. Now I want you to understand this: *The Washington Post* put out this terrible, disgusting article, saying I had done something. And I

¹⁴ See APRTheV YouTube Account, *The V - December 10, 2017 - Exclusive: Judge Roy Moore*, YOUTUBE.COM (Dec. 10, 2017), <https://www.youtube.com/watch?v=pHV8i8ILgeg> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 9).

want you to—I want you to understand something: they said these women—two—had not come forward for nearly forty years. But they waited ‘til thirty days before this general election to come forward. Now they’ve allowed their pictures to be on a political advertisement and they’ve gone on national television arguing their case after waiting forty years.”¹⁵

63. All these statements by Mr. Moore are defamatory. Mr. Moore sexually abused Ms. Corfman in 1979, when she was 14 years old and he was in his early 30s, and Mr. Moore’s denials of these facts are false and his characterizations of Ms. Corfman and her motivations are untrue. Mr. Moore knew or should have known that Ms. Corfman’s account is truthful because he was the perpetrator in the events she described. At a minimum, Mr. Moore was reckless in making these statements.

64. On November 28, 2017, Ms. Corfman published an open letter to Mr. Moore, asking Mr. Moore to stop denying his sexual abuse of her in 1979, to acknowledge his misconduct, and to apologize.¹⁶

65. Mr. Moore ignored—and continues to ignore—Ms. Corfman’s request.

66. Most recently—just last week—Mr. Moore repeated these false statements in a sworn affidavit to this Court. The affidavit is addressed in the next section.

¹⁵ See Judge Roy Moore for U.S. Senate, *Wiregrass Judge Roy Moore Drain the Swamp Rally in Dothan / Midland City Alabama with Steve Bannon and Congressman Louie Gohmert*, FACEBOOK.COM (Dec. 11, 2017, 3:38 PM), <https://www.facebook.com/JudgeRoyMoore/videos/714015632130004/> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 10).

¹⁶ Paul Gattis, *Exclusive: Accuser to Roy Moore, ‘Where does your immorality end?’*, AL.COM (Nov. 28, 2017), http://www.al.com/news/index.ssf/2017/11/roy_moore_leigh_corfman_accuse.html [<https://perma.cc/G7BW-3R36>] (last visited Jan. 3, 2018).

C. Mr. Moore's False Affidavit

67. On December 27, 2017, Mr. Moore, the Moore Campaign Committee, Troy Towns, and Peggy Turner sued the Secretary of State of Alabama and the Jefferson County Probate Judge, seeking to enjoin certification of Doug Jones's election to the United States Senate on the alleged basis of "systematic election fraud."¹⁷

68. Among other claims, the Complaint alleges that "Plaintiff Roy Moore has successfully completed a polygraph test confirming that the representations of misconduct made against him during the campaign are completely false." *Id.* at ¶ 22. This allegation has no relevance to the relief that Defendants seek for the purported "election fraud."

69. In support of this isolated, out-of-context allegation, the Complaint attaches a sworn affidavit of Mr. Moore. *Id.* at Attachment 1 ("Affidavit - Roy S. Moore - Re: Polygraph").

70. Mr. Moore's sworn affidavit does not identify the person who administered the purported polygraph examination or say anything about the examination methodology, questions, or results. *See id.* The examiner did not submit an affidavit.

71. Mr. Moore's affidavit claims that he took the polygraph examination "[w]ithin days after the December 12, 2017 special general election for United States Senate," but he does not specify the date or place he took the examination or explain why he took the examination after the election. *Id.*

72. Mr. Moore's affidavit also claims that the "examination concerned allegations of sexual misconduct made against me during the last month of the campaign by Leigh Corfman,

¹⁷ *See* Complaint at 1-2, ¶1, *Roy S. Moore et al. v. John H. Merrill et al.*, 03-CV-2017-902015.00 (Cir. Ct. of Montgomery Cty., Ala., filed Dec. 27, 2017) (copy of filed complaint attached hereto as Exhibit 11).

Beverly Nelson, and Tina Johnson,” but omits mention of the other six women who have publicly disclosed their experiences with Mr. Moore and whom he denies knowing. *Id.*

73. Mr. Moore’s sworn affidavit concludes with the untrue and defamatory characterization of the accounts of Ms. Corfman, Ms. Nelson, and Ms. Johnson as “false and malicious attacks.” *Id.*

74. Mr. Moore’s continued attacks against Ms. Corfman after the election and the content of his affidavit demonstrate that if not enjoined, he will continue to defame Ms. Corfman, if simply for the purpose of furthering his political goals.

75. Mr. Moore should be held accountable for his falsehoods made under penalty of perjury to this Court.

D. The Moore Campaign Committee’s False Attacks on Leigh Corfman

76. Like Mr. Moore, the Moore Campaign Committee has been relentless in its baseless and irresponsible attacks against Ms. Corfman, beginning the day of the *Washington Post* report on November 9, 2017.

77. That day, the Moore Campaign Committee posted a statement on its Twitter account, @TeamMoore, falsely denying the accounts of sexual misconduct disclosed by Ms. Corfman and others: “Judge Roy Moore has endured the most outlandish attacks on any candidate in the modern political arena, but this takes the cake.”¹⁸

78. The defamatory statement continued: “After over 40 years of public service, if any of these allegations were true, they surely would have been made public long before now.” *Id.*

¹⁸ See Moore Senate Team (@TeamMoore), TWITTER (Nov. 9, 2017, 4:07 PM), <https://twitter.com/TeamMoore/status/928776075668283392> [<https://perma.cc/Q7WC-5C7D>].

79. At least five representatives of the Moore Campaign Committee have repeated Mr. Moore's false denials of sexually abusing Ms. Corfman when she was 14 years old and Mr. Moore's reckless accusations of improper motivations: Richard Hobson; William Armistead; Benjamin DuPré; Janet Porter; and Dean Young. The allegations in paragraphs 80-93 below are illustrative of the Moore Campaign Committee's defamatory attacks, all of which were made on behalf of and for the benefit of Mr. Moore and the Moore Campaign Committee. They are false statements about Ms. Corfman that have damaged Ms. Corfman, including by imputing dishonesty and corruption to her, and the Moore Campaign Committee knew or should have known that they were false when made.

Richard Hobson

80. On November 14, 2017, Mr. Hobson, chief of staff for the Moore Campaign Committee, appeared on the *American Pastors Network* and accused Ms. Corfman of dishonesty: "Ms. Corfman, Judge Moore has never known her, he does not know her, he's never known her. And it was just a, a string of lies on Thursday with, with all of the, the women who came out."¹⁹

William Armistead

81. On November 15, 2017, the Moore Campaign Committee held a televised press conference during which Mr. Armistead, chairman of the Moore Campaign Committee, questioned Ms. Corfman's integrity: "As you know, Judge Moore's been falsely accused of some things that he did not do forty years ago. This is a campaign, so you can expect most anything to

¹⁹ 11/14/17—*Current Events: NC Church Fire. Accusations against Senate Candidate Moore*, STAND IN THE GAP TODAY (Nov. 14, 2017), SUBSPASH.COM, <https://subsplash.com/americanpastors/media/mi/+zhn4d6x> (last visited Jan. 3, 2018) (audio attached hereto as Exhibit 12).

come out, but you know we can't just stand by idly and let false charges go without some answering."²⁰

82. In an interview with *The Weekly Standard* published December 3, 2017, Mr. Armistead further attempted to discredit Ms. Corfman by smearing her character: "She went to court—the mother to turn the custody over to the father—because [Ms. Corfman] was a problem child."²¹

Benjamin DuPré

83. On November 21, 2017, Mr. DuPré, an authorized campaign spokesman, accused Ms. Corfman in a video-broadcast press event of lying: "Let's look at Leigh Corfman. She's made some serious allegations against Judge Moore to *The Washington Post* and yesterday, uh, in a very, uh, softball interview on *The Today Show*. We reject them as false, and we continue to maintain that Judge Moore did not know Leigh Corfman nor has he ever known Leigh Corfman."²²

84. Mr. Dupré further stated that the Moore Campaign Committee had "done some basic research" and offered five sham points that purport to discredit Ms. Corfman's account of Mr. Moore's sexual misconduct but these points do nothing of the sort.

²⁰ See *Roy Moore Attorney Press Conference*, C-SPAN.ORG (Nov. 15, 2017), <https://www.c-span.org/video/?437406-1/roy-moore-campaign-holds-news-conference-sexual-misconduct-allegations> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 13).

²¹ See John McCormack, *Brazening It Out: On the Ground with Roy Moore's Campaign in Alabama*, THE WEEKLY STANDARD (Dec. 3, 2017, 1:25 AM), <http://www.weeklystandard.com/brazening-it-out-on-the-ground-with-roy-moores-campaign-in-alabama/article/2010667> [<https://perma.cc/22CS-W992>] (last visited Jan. 3, 2018).

²² See Fox News Channel Facebook Account, *Judge Roy Moore's campaign spokesman holds a press conference to address recent developments related to accusations levied against Moore*, FACEBOOK.COM (Nov. 21, 2017, 12:01 PM), <https://www.facebook.com/FoxNews/videos/10156314810321336/> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 14).

85. The Moore Campaign Committee knew or should have known that none of these five points, which are outlined below, is inconsistent with Ms. Corfman's account of Mr. Moore's sexual abuse when she was 14 years old.

86. Each point is a sham, rebuttable by the most superficial investigation (which the Moore Campaign Committee plainly failed to undertake), and the Moore Campaign Committee recklessly disregarded the truth in its attempts to tarnish Ms. Corfman:

- a. Sham Point One: "According to Court documents that we were easily able to obtain at the Etowah County Courthouse, . . . the court document signed by Leigh Corfman's parents back when she was a minor asked for custody to be changed from the mother to the father, and as best as we can tell, the hearing, if it ever happened, to which Leigh Corfman refers, took place February 21st of, uh, 1979, and on that date—you haven't heard this yet—on that date, the Judge signed the Order where the parents requested that Leigh Corfman be transferred from the custody of her mother to her father." *Id. But* the very documents to which the Moore Campaign Committee refer establish that the custody hearing took place in February 1979, and Ms. Corfman has never disputed that primary custody was transferred from her mother to her father at the hearing.
- b. Sham Point Two: "[S]he claims her life spiraled out of control after she first contacted or was contacted by Judge Roy Moore. However, as her own parents said in their joint petition to modify custody, and I quote 'that each of the parties have become con—increasingly concerned and worried about certain disciplinary and behavioral problems being manifested by their minor child.'" *Id. But* not only is Ms. Corfman's behavior as a minor irrelevant to whether Mr. Moore

sexually abused her, the Moore Campaign Committee knew or should have known that the court documents do not contradict Ms. Corfman's account.

Ms. Corfman has never denied disciplinary problems before Mr. Moore approached her at the Etowah County courthouse, and she has truthfully and publicly acknowledged that she was "not a saint" in the following years.

- c. Sham Point Three: "[O]ne of the lynchpins of her story is that Judge Moore talked to her on—quote—'her phone in her bedroom.' Within days of this story coming out, her own mother told *Breitbart News* that there was no phone in her bedroom. So we know that has proof to be a falsehood as well." *Id.* But the Moore Campaign Committee knew or should have known that Ms. Corfman's account of her telephone discussions is not "a falsehood." The Corfmans had a home telephone with a long cord that could be brought into her room as was common at that time. This sham point was featured in an article published before the election in *Breitbart News*,²³ which supported Mr. Moore's candidacy, but, tellingly, on December 20, 2017, CNN reported that *Breibart* editor-in-chief Alex Marlow believes Ms. Corfman's account and quoted him as saying that it has "a lot of credibility."²⁴

²³ Aaron Klein, *Court Documents Raise Significant Questions about Leigh Corfman's Accusations against Roy Moore*, BREITBART.COM (Nov. 21, 2017), <http://www.breitbart.com/big-government/2017/11/21/court-documents-raise-significant-questions-leigh-corfmans-accusations-roy-moore/> [<https://perma.cc/3TYC-MBDZ>] (last visited Jan. 3, 2018).

²⁴ Oliver Darcy, *Breibart went all out for Roy Moore. Now its top editor says he was a 'weak candidate'*, CNN.COM: CNN MONEY (Dec. 20, 2017, 11:36 AM) <http://money.cnn.com/2017/12/20/media/breitbart-alex-marlow-roy-moore/index.html> [<https://perma.cc/Q3B6-BAG3>] (last visited Jan. 3, 2018).

- d. Sham Point Four: “Corfman alleges that, uh, she would meet Moore around the corner from her house and he would take her, uh, to her [*sic*] house according to her. However, according to public records that the media has not bothered to look at, we’ve been able to find that Corfman’s supposed pick up place was almost a mile away from her mother’s house and would have been across a major thoroughfare. This is yet another improbable fact in Leigh Corfman’s own words and story that the media has not bothered to investigate.”²⁵ *But* the Moore Campaign Committee knew or should have known that Ms. Corfman’s mother did not move to the house cited by Mr. Dupré until after Mr. Moore sexually abused Ms. Corfman.
- e. Sham Point Five: “I would point out that Corfman’s father did not live in Gadsden or even Rainbow City at the time of all this, he lived farther away in Ohatchee, Alabama, as is borne out by these court documents that you all may find at the Etowah County Courthouse.” *Id.* *But* the Moore Campaign Committee knew or should have known that Ms. Corfman’s father’s residence is unrelated to Ms. Corfman’s account of Mr. Moore’s sexual misconduct because she was staying with her mother the two nights when Mr. Moore picked her up and drove her to his house.

²⁵ See Fox News Channel Facebook Account, *Judge Roy Moore’s campaign spokesman holds a press conference to address recent developments related to accusations levied against Moore*, FACEBOOK.COM (Nov. 21, 2017, 12:01 PM), <https://www.facebook.com/FoxNews/videos/10156314810321336/> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 14).

Janet Porter

87. On December 5, 2017, Ms. Porter, an authorized campaign spokeswoman, in a national television appearance on CNN, characterized Ms. Corfman’s account of Mr. Moore’s misconduct and those of the other women as “false” and “baseless.”²⁶

88. In that same appearance, Ms. Porter dismissed Ms. Corfman’s *Today Show* interview on November 27, 2017 as “an Academy Award performance” and repeated the Moore Campaign Committee’s sham points: “I don’t believe [Leigh Corfman] at all, and I’ll tell you why. Um, not only was she sought after by *The Washington Post*, her own mother doesn’t believe elements of her story. Uh, the element of, of the, the phone call that took place in the bedroom—mother says there was no phone in her bedroom. The element that she told *The Washington Post* that her, her life spiraled out of control after this alleged incident—well that’s not what her mother said, that’s not what the court records say.” *Id.*

89. Following Mr. Moore’s submission of his affidavit to this Court, Ms. Porter repeated the Moore Campaign Committee’s claims that Mr. Moore did not know any of the women who publicly disclosed their encounters with him.

90. On December 28, 2017, Ms. Porter appeared on a nationally broadcast CNN program and stated that Mr. Moore took a polygraph test and “not surprising to anyone who knows Judge Moore, he completely passed it. What do you know, he didn’t know any of these women and he never conducted—engaged in sexual misconduct.”²⁷ Ms. Porter, however, was

²⁶ See *Roy Moore campaign staffer’s full interview*, CNN.COM, <http://www.cnn.com/videos/politics/2017/12/05/janet-porter-roy-moore-campaign-newday-full.cnn> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 15).

²⁷ Transcript of *Moore Suit Won’t Delay Certification; Moore Asks Courts to Intervene; Alabama to Certify Senate Election*, CNN: INSIDE POLITICS, 2017 WLNR 40126813 (Dec. 28, 2017).

unable to answer even basic questions about the circumstances and validity of the polygraph. She was unable to explain why Mr. Moore did not take the polygraph before election day and stated that all she “know[s] is that it’s a renowned independent expert that he went before.” *Id.*

91. On December 29, 2017, Ms. Porter appeared on a nationally broadcast CNN program once more and stated, in regard to Mr. Moore’s purported polygraph test: “I’ll tell you the test results is that [Mr. Moore] did not know any of these women who made against these accusations against him and did not engage in any sexual misconduct.”²⁸

Dean Young

92. On December 10, 2017, Mr. Young, the chief political strategist for the Moore Campaign Committee, dismissed Ms. Corfman and others as attention-seeking liars during a nationally televised appearance on ABC’s *This Week* with Martha Raddatz: “[T]he people of Alabama want to know why thirty days before an election that people would just come out of the woodwork and say ‘And Judge Moore did this,’ and ‘Judge Moore did that.’ I’m not sure why they did it, I don’t believe them and the people of Alabama don’t believe them. But I guess, you know, one of them was in *Time* magazine, uh, one of them was, was on your show on Friday. Ah, in this world where everybody wants to be on TV, you know, maybe that’s the reason.”²⁹

93. When Ms. Raddatz asked if he was “calling Leigh Corfman a liar,” Mr. Young responded in the affirmative: “I’m, I’m saying Leigh Corfman’s not telling the truth. . . . Zero

²⁸ Transcript of *Judge Rejects Roy Moore’s Election; Challenge Democrat Doug Jones Certified as Winner; President Trump: China Caught ‘Red Handed’*, CNN: ANDERSON COOPER 360, 2017 WLNR 40200120 (Dec. 29, 2017).

²⁹ Nicki Zink, *Roy Moore aide ‘highly’ doubts there will be Senate ethics probe if he wins*, ABCNEWS.GO.COM (Dec. 10, 2017, 9:26 AM), <http://abcnews.go.com/Politics/roy-moore-aide-highly-doubts-senate-ethics-probe/story?id=51692435> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 16).

evidence, and—and this, this fake narrative about Judge Moore that the people of Alabama have been putting up with for three or four weeks is falling apart in front of y'all's eyes.” *Id.*

* * *

94. The Moore Campaign Committee’s statements are defamatory. Mr. Moore sexually abused Ms. Corfman in 1979, when she was 14 years old and he was in his early 30s. The Moore Campaign Committee’s denials of these facts are false and its affirmative characterizations of Ms. Corfman and her motivations are untrue. The Moore Campaign Committee knew or should have known that Ms. Corfman’s account is truthful. At a minimum, the Moore Campaign Committee was reckless in making these statements.

E. The Hateful And Derogatory Public Comments About Ms. Corfman Generated By Mr. Moore And The Moore Campaign Committee

95. Following the example set by Mr. Moore and the Moore Campaign Committee, the public subjected Ms. Corfman to hateful, derogatory, and even violent remarks.

96. The defamatory statements directed at Ms. Corfman forced her to take a leave of absence from her job until after the election, resulting in lost wages and further economic damages capable of being measured in money to be proven at trial.

97. A sample of the remarks that have been directed at Ms. Corfman following the lead of Mr. Moore and the Moore Campaign Committee are included below for illustrative purposes:

- a. “#LeighCorfman was a 14 year old whore. #FakenewsCNN at its best. #JudgeRoyMoore #MAGA.” Jacques Wolfgang (@LeDonDiable), TWITTER (Nov. 20, 2017, 10:26 AM), <https://twitter.com/LeDonDiable/status/932676530253295616> [<https://perma.cc/Z5WB-DJ9U>].

- b. “[K]nown whore chases money and sex from Doug Jones Payroll in millions as he pimps her out to gain office #tcot”. Reaganite (@firmconservative), TWITTER (Nov. 21, 2017, 6:21 AM),
<https://twitter.com/firmconsevative/status/932977192992215040>
[\[https://perma.cc/Y6ZJ-ZTXP\]](https://perma.cc/Y6ZJ-ZTXP).
- c. “Leigh Corfman. Look at this puppet theater . . . has anyone EVER seen the media go all in with unproven allegations? Roy Moore is going to be a senator, disprove this bitch and OWN @NBC & @comcast when this is done.” Joe #StillAmerica1st (@Nationalism1st), TWITTER (Nov. 20, 2017, 6:26 AM),
<https://twitter.com/Nationalism1st/status/932616260130693120/photo/1>
[\[https://perma.cc/BV66-L7Z9\]](https://perma.cc/BV66-L7Z9).
- d. “Corfman is one big liar. Her story doesn’t add up. . . . Probably someone like Rove behind this. DIRTY.” DodgUSA24 (@DodgUSA24), TWITTER (Nov. 30, 2017, 9:46 AM), <https://twitter.com/DodgUSA24/status/936290342919434247>
[\[https://perma.cc/N9KF-4MJ9\]](https://perma.cc/N9KF-4MJ9).
- e. “@MooreSenate Accuser Leigh Corfman is No Victim! She is a Liar! She smeared herself in an interview by trying to destroy others. This is clearly, politically motivated. She was very promiscuous, she said that at 14 she was a child playing in an adults world. No Victim Here!” fordram111 (@fordram111), TWITTER (Nov. 22, 2017, 7:44 AM),
<https://twitter.com/fordram111/status/933360519486074881>
[\[https://perma.cc/4AZT-6GTU\]](https://perma.cc/4AZT-6GTU).

- f. “Ladies . . . if you want to accuse a man, DO NOT DO IT VIA ENDORSERS OF OPPOSING CANDIDATE ONE MONTH BEFORE AN ELECTION. We don't know for sure about Leigh Corfman but we can only assume FAKE because she is using it for political reasons. That generally means it's a lie.” Josco (@JoscoJVTeam), TWITTER (Jan. 1, 2018, 10:26 AM), <https://twitter.com/JoscoJVTeam/status/947896867517374464> [<https://perma.cc/6CBP-QWS4>].
- g. “Leigh Corfman lies and babies are gonna die!” Tim McGuire (@iamajax), TWITTER (Dec. 19, 2017, 10:25 AM), <https://twitter.com/iamajax/status/943185548750942208> [<https://perma.cc/RWX4-7WB8>].
- h. “More than likely Leigh Corfman is working for the Alt-Left Liberal Democrat LGBTQIAPK Satanists. . . . The bitch is a professional paid accuser who has been used multiple times to even bring down pastors. Paid Lying Whore” E Pluribus Unum (@JesusIsKing2024), TWITTER (Nov. 11, 2017, 6:12 AM), <https://twitter.com/JesusIsKing2024/status/929351246510686209> [<https://perma.cc/HE7N-TA7L>].

98. Members of the public have also fabricated allegations about Ms. Corfman that have no basis in truth, including that she has accused pastors of sexual abuse: “Leigh Corfman, accuser of #RoyMoore, has a history of false accusations. At least three cases of ‘sexual misconduct’ were brought up before her church district board. All dismissed due to her being ‘uncredible’. Also tried to sue a pastor in 2007. Same reason. Same outcome.” DC Hinckley (@DC1776), TWITTER (Nov. 10, 2017, 10:11 AM),

<https://twitter.com/DC1776/status/929048827449020416> [<https://perma.cc/HM5N-LK29>].

These statements are untrue.

99. Finally, at the December 11, 2017 campaign rally addressed in Paragraph 62 above, following Mr. Moore's lead, the crowd responded concerning Ms. Corfman and the other women: "They're liars!" and "[t]hey lie!"³⁰

COUNT I

INJUNCTIVE RELIEF FOR DEFAMATION

100. Ms. Corfman repeats and realleges the foregoing paragraphs as if fully set forth herein.

101. Mr. Moore and the Moore Campaign Committee made false statements about Ms. Corfman, including that her account of being sexually abused by Mr. Moore when she was 14 years old is not true, that Ms. Corfman knew that her account is false when she gave it, that she is immoral, and that she was motivated to come forward for political, financial, or other purposes unrelated to the search for truth.

102. The statements by Mr. Moore and the Moore Campaign Committee identified Ms. Corfman, explicitly or implicitly.

103. The statements by Mr. Moore and the Moore Campaign Committee are defamatory *per se* because they are false and impute dishonesty and corruption to Ms. Corfman, or are otherwise defamatory under Alabama law.

³⁰ See Judge Roy Moore for U.S. Senate, *Wiregrass Judge Roy Moore Drain the Swamp Rally in Dothan / Midland City Alabama with Steve Bannon and Congressman Louie Gohmert*, FACEBOOK.COM (Dec. 11, 2017, 3:38 PM), <https://www.facebook.com/JudgeRoyMoore/videos/714015632130004/> (last visited Jan. 3, 2018) (video attached hereto in MPEG-4 format as Exhibit 10).

104. The statements by Mr. Moore and the Moore Campaign Committee have been published throughout Alabama and across the country on the internet, on the radio, on television, and in newspapers.

105. Mr. Moore and the Moore Campaign Committee made each defamatory statement with knowledge that it was false or with reckless disregard of whether it was false or not.

106. Ms. Corfman suffered emotional and economic damage as a result of the statements by Mr. Moore and the Moore Campaign Committee.

107. As a natural result of Mr. Moore's and the Moore Campaign Committee's defamatory statements, Ms. Corfman was forced to take a leave of absence from her job until after the election, resulting in lost wages and further economic damages capable of being measured in money in an amount to be proven at trial.

108. Ms. Corfman requests that this Court enter declaratory judgment pursuant to Alabama Code Section 6-6-220, *et seq.*, that Mr. Moore and the Moore Campaign Committee have defamed Ms. Corfman by the statements described in this Complaint.

PRAYER FOR RELIEF

WHEREFORE, Ms. Corfman respectfully requests judgment against Defendants as follows:

1. Ordering that Defendants have defamed Ms. Corfman by the statements described in this Complaint;
2. Ordering Defendants to retract all defamatory statements made against Ms. Corfman, to publicly apologize for these defamatory statements, and to refrain from making further defamatory statements;
3. Directing Defendants to pay the costs and expenses of this action; and

4. Providing further relief as permitted by law and as the Court deems appropriate.

**PLAINTIFF LEIGH CORFMAN DEMANDS
A TRIAL BY JURY OF ANY ISSUE TRIABLE OF RIGHT BY A JURY.**

Respectfully Submitted,

Dated: January 4, 2018

/s/ Melody H. Eagan

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