

CHRIS DEROSE  
Clerk of the Superior Court  
By Eufemia Vazquez-Fregoso, Deputy  
Date 10/10/2018 Time 15:54:24

| Description                     | Amount |
|---------------------------------|--------|
| ----- CASE# CV2018-013114 ----- |        |
| CIVIL NEW COMPLAINT             | 333.00 |
| TOTAL AMOUNT                    | 333.00 |
| Receipt# 26845609               |        |

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2 Amy D. Sells (SBN 024157)  
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9 **SUPERIOR COURT OF ARIZONA**

10 **MARICOPA COUNTY CV 2018-013114**

11 PAMELA YOUNG, an individual; MODELS  
12 PLUS INTERNATIONAL, LLC dba THE  
13 YOUNG AGENCY, an Arizona Limited  
14 Liability Company;

15 Plaintiff,

16 vs.

17 WENDY ROGERS and HAL KUNNEN,  
18 husband and wife; WENDYROGERS.ORG, a  
19 Principal Campaign Committee;

20 Defendants

Case No. \_\_\_\_\_

**COMPLAINT**

(Defamation; False Light Invasion of  
Privacy; Punitive Damages)

Tier 3

21 Pamela Young ("Ms. Young") and Models Plus International, LLC dba The  
22 Young Agency ("The Young Agency") (collectively "Plaintiffs") allege as follows:

23 **INTRODUCTION**

24 1. Ms. Young is one of Arizona's most accomplished female African-  
25 American small business owners. She has spent the past 30 plus years building the  
26 Young Agency, a full-service model/talent agency that represents models and actors in  
27 Arizona. Defendant Wendy Rogers is the Republican candidate for Arizona's 1<sup>st</sup>  
28 Congressional District. In an effort to discredit her opponent in the 2018 Republican

1 primary election—who worked for the Young Agency—Defendant Wendy Rogers  
2 published throughout Arizona several false and misleading statements regarding the  
3 Young Agency, namely that it “specializes in underage girls and advertises on websites  
4 linked to sex trafficking,” or words to that effect. To call Defendant Wendy Roger’s  
5 conduct “dirty politics” is an understatement. Her conduct was outrageous and  
6 indefensible, and unnecessarily tarnished the reputations of Ms. Young and the Young  
7 Agency. Through this lawsuit, Ms. Young and the Young Agency seek to hold  
8 Defendant Wendy Rogers and her campaign accountable for their conduct.

9 **PARTIES, JURISDICTION, AND VENUE**

10 2. Plaintiff Ms. Young is a citizen of Arizona residing in Maricopa County.

11 3. Plaintiff the Young Agency is an Arizona Limited Liability Company  
12 authorized to do business in Arizona and doing business in Maricopa County and other  
13 Arizona Counties.

14 4. Defendants Wendy Rogers and Hal Kunnen are husband and wife and  
15 citizens of Arizona. At all relevant times, Defendant Wendy Rogers was acting in  
16 furtherance of, and for the benefit of, her marital community.

17 5. Defendant WendyRogers.org is the Principal Campaign Committee  
18 running Defendant Wendy Rogers’ political campaign for Arizona’s 1<sup>st</sup> Congressional  
19 District.

20 6. At all relevant times, Defendants Wendy Rogers and WendyRogers.org  
21 acted in concert as joint tortfeasors, and they are therefore jointly and severally liable to  
22 Plaintiffs under A.R.S. § 12-2506(d)(1).

23 7. At all relevant times, Defendant WendyRogers.org was acting as an agent  
24 or servant of Defendant Wendy Rogers, and *vice versa*, and they are therefore jointly  
25 and severally liable to Plaintiffs under A.R.S. § 12-2506(d)(2).

26 8. At all relevant times, Defendants Wendy Rogers and WendyRogers.org  
27 conspired to effectuate, and mutually aided and abetted one another in, the tortious  
28 conduct alleged herein.

1 9. Defendants Wendy Rogers and WendyRogers.org are collectively referred  
2 to as the "Rogers Campaign."

3 10. The alleged conduct occurred in Maricopa County, as well as other  
4 Arizona counties.

5 11. Given the legal and logistical complexities of the case, and given that  
6 Plaintiffs seek special, general, and punitive damages in excess of \$300,000.00, this case  
7 qualifies for Tier 3 designation under Arizona Rule of Civil Procedure 26.2.

8 12. This Court has jurisdiction over this action under A.R.S. § 12-123 and the  
9 Arizona Constitution, Article VI, § 14.

10 13. Venue is proper in this Court under A.R.S. § 12-401(10). *See also Sulger*  
11 *v. Superior Court In & For Cochise & Pima Ctys.*, 85 Ariz. 299, 302 (1959) (holding  
12 that an action for defamation may be brought in the county in which the defamatory  
13 statement was published).

14 **GENERAL ALLEGATIONS**

15 14. The Young Agency is a full-service model/talent agency that represents  
16 models, actors, and talent for local and national print, fashion, runway, commercial,  
17 television, film, voice over, video and promotional modeling.

18 15. Ms. Young, a former model and actor herself, founded the Young Agency  
19 in Arizona in 1996.

20 16. As an African-American woman, Ms. Young has been recognized by the  
21 AZ Business Journal as one of the top minority business owners in the State of Arizona.

22 17. For over 30 years, Ms. Young has worked diligently to build a reputation  
23 for herself and the Young Agency in Arizona's small business community and its  
24 modeling/entertainment sector.

25 18. As with any small business owner, Ms. Young's personal and professional  
26 reputation is inextricably tied to that of the Young Agency.

27 19. Defendant Wendy Rogers is the Republican candidate for Arizona's 1<sup>st</sup>  
28 Congressional District ("CD1").





1           39. The Rogers Campaign's actions as alleged herein constitute invasion of  
2 privacy and placed Plaintiffs before the public in a false light.

3           40. The Rogers Campaign's publications about Plaintiffs would be highly  
4 offensive and objectionable to a reasonable person and were, in fact, highly offensive  
5 and objectionable to Plaintiffs.

6           41. The Rogers Campaign had knowledge of or acted in reckless disregard as  
7 to the falsity of the publicized matters and the false light in which Plaintiffs were placed.

8           42. The Rogers Campaign's actions have caused damages to Plaintiffs.

9           43. Rogers Campaign is also liable for damages resulting from the  
10 republication of its false and misleading statements because the Rogers Campaign  
11 deliberately crafted these statements to be salacious and with the express expectation  
12 that others would republish these statements.

13           44. Based upon the Rogers Campaign's misconduct, Plaintiffs are entitled to  
14 recover presumed damages, as well as general and special damages against The Rogers  
15 Campaign.

16           45. The Rogers Campaign either intended to injure Plaintiffs or consciously  
17 pursued a course of conduct knowing that it created a substantial risk of significant harm  
18 to others, thereby entitling Plaintiffs to an award of punitive damages.

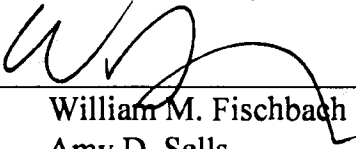
19           **WHEREFORE**, Plaintiffs demand judgment against the Rogers Campaign as  
20 follows:

- 21           A. For presumed, special, and general damages;  
22           B. For punitive damages;  
23           C. For Plaintiffs' taxable costs under A.R.S. § 12-341; and  
24           D. For such other further relief as this Court deems just and proper.

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RESPECTFULLY SUBMITTED this 9th day of October, 2018.

TIFFANY & BOSCO, P.A.

By:  \_\_\_\_\_

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