

JEFF FINE  
Clerk of the Superior Court  
By Brittney Silva, Deputy  
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Description	Amount
----- CASE# CV2019-012679 -----	
CIVIL NEW COMPLAINT	333.00
TOTAL AMOUNT	333.00
Receipt# 27432751	

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10 *Attorneys for Plaintiff Ian McIntosh*

11 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

12 BY AND FOR THE COUNTY OF MARICOPA

13 IAN McINTOSH, an unmarried man,  
14  
15 Plaintiff,

16 v.

17 YOUTH DEVELOPMENT INSTITUTE,  
18 an Arizona Nonprofit Corporation; LUZ  
19 MOGROVEJO AND JOHN DOE  
20 MOGROVEJO, a married couple; JANE  
21 AND JOHN DOES I-X; ABC  
22 CORPORATIONS I-X; BLACK &  
23 WHITE PARTNERSHIPS I-X,

24 Defendants.

Case No. **CV2019-012679**

**COMPLAINT**

(Jury Trial Demanded)

Tier 1 (Ariz. R. Civ. P. 26.2(b)(1))

25 For his complaint against Defendants Youth Development Institute, Luz Mogrovejo and  
26 John Doe Mogrovejo, Plaintiff Ian McIntosh, through undersigned counsel, hereby alleges as  
follows:

**PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff Ian McIntosh is an unmarried man now residing in the State of Washington.
2. Upon information and belief, Defendant Youth Development Institute is an Arizona nonprofit corporation, authorized to do business and doing business in Maricopa County, Arizona.





1 of "attempted computer tampering."

2 12. Per the plea agreement, the court retained the discretion to designate the  
3 matter as a felony or a misdemeanor; determine whether Mr. McIntosh would be placed on  
4 "standard" or "intensive" probation; determine the length of probation; and determine  
5 whether Mr. McIntosh would be subject to sex-offender terms of probation.

6 13. Per the plea agreement, the Court's determination would be based on a  
7 "Psychosexual Evaluation" to be completed by a court-appointed psychologist before  
8 sentencing.

9 14. At Mr. McIntosh's change-of-plea hearing, the Court appointed Dr. Luz  
10 Mogrovejo, Ph.D. to complete the required Psychosexual evaluation.

11 The Psychosexual Evaluation

12 15. Mr. McIntosh met with Dr. Mogrovejo once, on August 18, 2016.

13 16. After that meeting, Dr. Mogrovejo prepared and issued a written report  
14 diagnosing him as "Sexual Abuse (Perpetrator)," identifying Mr. McIntosh's risk of  
15 reoffending as "moderate," and recommending that Mr. McIntosh be subject to a series of  
16 polygraph assessments to determine the extent of his issues, as well as 8-12 months of  
17 intensive outpatient sex offender therapy.

18 17. Dr. Mogrovejo's conclusions were based on a series of misstatements of fact;  
19 misinterpretations of the proper way to administer the Psychosexual Evaluation; mis-use of  
20 out-of-date assessments that were no longer acceptable for use; and mis-scorings of results.

21 18. On September 7, 2016, Mr. McIntosh proceeded to sentencing.

22 19. Based on Dr. Mogrovejo's evaluation, the Court sentenced Ian to a 90-day  
23 sentence of juvenile detention, which it deferred upon completion of a lengthy probation  
24 term; imposed sex offender terms of Mr. McIntosh; and required Mr. McIntosh to complete  
25 a term of intensive sex offender treatment in order to avoid his sentence of incarceration.

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**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Ian McIntosh hereby requests that the Court enter judgment against Defendants Youth Development Institute, Luz Mogrovejo, and John Doe Mogrovejo as follows:

A. For monetary damages in an amount sufficient to compensate Mr. McIntosh for the full measure of his losses, including but not limited to his medical expenses, lost wages, pain, suffering, mental and emotional anguish, and loss of enjoyment of life.

B. For punitive damages, insofar as Defendants actions constituted aggravated negligence, in an amount sufficient to punish Defendants and deter them from similar conduct in the future;

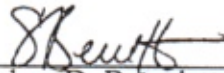
C. For taxable costs and pre- and post-judgment interest to the extent permitted by law;

D. For attorneys' fees as permitted by law; and

E. For such other relief as the Court deems just and proper.

DATED this 24<sup>th</sup> day of September, 2019.

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By:   
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