

1 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
2 **IN AND FOR THE COUNTY OF MARICOPA**

3
4 JOHN SMITH,

5 Plaintiff,

6 vs.

7 JANE DOE, individually, JOHN ROE,
8 individually, and ARIZONA MEDICAL
9 BOARD, a constitutionally and legally
10 established entity of the State of Arizona,

11 Defendants.

Case No.:

**COMPLAINT FOR DEFAMATION,
CIVIL CONSPIRACY, TORTIOUS
INTERFERENCE WITH
CONTRACTUAL RELATIONSHIP, AND
INVASION OF PRIVACY/FALSE LIGHT**

12 PLAINTIFF JOHN SMITH hereby alleges the following complaint against
13 Defendants JANE DOE, JOHN ROE, and ARIZONA MEDICAL BOARD, as follows:

14 **JURISDICTIONAL ALLEGATIONS**

15
16 1. This is an action for damages that is greater than the sum of \$1,000.00,
17 exclusive of interest and costs.

18
19 2. At all times material to this lawsuit, Plaintiff JOHN SMITH (“Plaintiff”) was
20 a resident of Maricopa County, Arizona.

21 3. At all times material to this lawsuit, Defendants JANE DOE and JOHN ROE
22 (“Doe/Roe”) were residents of Maricopa County Arizona.
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

15. Defendants' subject statements were intentional and unprivileged.

16. Defendants' subject statements were intentionally and knowingly disseminated/published to numerous third parties for the purpose of harming Plaintiff's professional and personal reputation.

17. As a proximate result of Defendants' intentional and malicious publication of the subject statements, Plaintiff has suffered compensable monetary injury.

WHEREFORE, Plaintiff seeks a judgment for compensatory damages against all Defendants, a judgment for punitive damages against Defendants Doe/Roe, and the costs of this action.

COUNT TWO
(Invasion of Privacy/False Light – all Defendants)

Plaintiff realleges all allegations set forth in Paragraphs One (1) through Thirteen (13) as though fully rewritten herein.

18. Defendants' dissemination of the subject statements constitutes giving publicity to a factual matter concerning Plaintiff that placed Plaintiff before the public in a false light for the purpose of causing Plaintiff economic and emotional injury.

19. The false light in which Plaintiff was placed – alleging that Plaintiff performed surgical procedures without the proper licensure – is highly offensive to a reasonable person.

1
2 20. Defendants had knowledge of or acted in reckless disregard as to the falsity
3 of the publicized matter and the false light in which Plaintiff would be placed.
4

5 21. As a proximate result of Defendants' intentional and malicious dissemination
6 of the subject statements, Plaintiff has suffered compensable monetary injury.
7

8 WHEREFORE, Plaintiff seeks a judgment for compensatory damages against all
9 Defendants, a judgment for punitive damages against Defendants Doe/Roe, and the costs of
10 this action.
11

12 **COUNT THREE**
13 **(Tortious Interference with Contractual Relationship – Defendants Doe/Roe)**

14 Plaintiff realleges all allegations set forth in Paragraphs One (1) through Thirteen
15 (13) as though fully rewritten herein.
16

17 22. Plaintiff's business relationship with Acme constituted a valid contractual
18 relationship or business expectancy.
19

20 23. Defendants Doe/Roe had specific knowledge of Plaintiff's contractual
21 relationship or business expectancy with Acme.
22

23 24. Defendants Doe/Roe's dissemination of the subject statements to
24 representative(s) of Acme constitutes an intentional and malicious interference with
25 Plaintiff's contractual relationship or business expectancy with Acme for the specific

1 purpose of inducing or causing a breach or termination of said contractual relationship or
2 business expectancy.

3
4 25. Defendants Doe/Roe acted with improper and malicious motive when
5 interfering with Plaintiff's contractual relationship or business expectancy with Acme.

6
7 26. As a proximate result of Defendants Doe/Roe's intentional and malicious
8 interference, Plaintiff suffered compensable monetary injury.

9 WHEREFORE, Plaintiff seeks a judgment for compensatory and punitive damages
10 against Defendants Doe/Roe, and the costs of this action.

11
12
13 **COUNT FOUR**
14 **(Civil Conspiracy – Defendants Doe/Roe)**

15 Plaintiff realleges all allegations set forth in Paragraphs One (1) through Thirteen
16 (13) as though fully rewritten herein.

17
18 27. Defendants Doe/Roe formed an agreement to accomplish an unlawful
19 purpose, *to wit*, to injure Plaintiff's professional and personal reputation and effect the
20 termination of Plaintiff's business relationship with Acme.

21
22 28. In furtherance of this agreement, Defendants Doe/Roe, acting in concert,
23 engaged in intentional tortious conduct directed at Plaintiff by disseminating the subject
24 statements to representative(s) of Acme.
25

1 29. As a proximate result of Defendants Doe/Roe's conspiracy to injure Plaintiff,
2 Plaintiff has suffered compensable monetary injury.

3
4 WHEREFORE, Plaintiff seeks a judgment for compensatory and punitive damages
5 against Defendants Doe/Roe, and the costs of this action.

6
7 DATED this ____ day of _____, 20__.

8
9
10
11 _____
12 John Smith
13 0000 E Main St.
14 Pankan, AZ 00000
15 Tel: 000-000-0000
16 Fax: 000-000-0000
17
18
19
20
21
22
23
24
25