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IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

ANDREW IVCHENKO AND RENEE
IVCHENKO, husband and wife,

Plaintiffs,

vs.

DAVID S. GINGRAS; TRAVIS PAUL
GRANT and MARIEL LIZETTE GRANT,
husband and wife; KYLE DAVID
GRANT; JOHN and JANE DOES I-X;
BLACK CORPORATIONS I-X; and
WHITE COMPANIES I-X,

Defendants.

Case No. CV2021-093562

**PLAINTIFFS' RESPONSE TO
DEFENDANTS' MOTION TO STAY**

(Assigned to Hon. Peter Thompson)

Plaintiffs Andrew Ivchenko and Renee Ivchenko ("Plaintiffs") respectfully submit the following Response to Defendants David S. Gingras ("Defendant Gingras"), Travis Paul Grant, Mariel Lizette Grant, and Kyle David Grants' (the "Grant Defendants") (collectively, the "Defendants") Motion to Stay. This Motion is based on the Memorandum of Points and Authorities; the attached exhibits; Plaintiffs' Request for Judicial Notice filed and served herewith; and upon the papers, records and pleadings on file herein; all of which are incorporated herein. For the reasons fully set forth below, Plaintiff respectfully request that this Court deny Defendants' motion.

1 **I. INTRODUCTION**

2 The Grant Defendants are First Amendment opportunists that exploit arrest
3 information and misappropriate images in booking photos to create misleading
4 advertisements designed to generate substantial advertising revenue from the victims
5 whose images have been misappropriated. [See Compl. ¶ 1.] The Grant Defendants are
6 notorious mugshot website operators, and operate several websites that post mugshots
7 and criminal records, including that of Plaintiff Renee Ivchenko. These include
8 www.publicpolice.com and www.usbondsmen.com (the “Websites”), on which
9 millions of arrestees appear [See Compl. ¶ 5.] In enacting A.R.S. §§ 44-7901, 7902 (the
10 “Arizona Mugshot Act”), the Arizona Legislature (the “Legislature”) recognized that the
11 commercial exploitation of one’s arrest information and booking photo causes daily,
12 ongoing and continuing damage.

13 The Legislature’s objective in passing the Arizona Mugshot Act was to put an
14 end to the reprehensible activities of mugshot website operators like the Grant
15 Defendants. The Arizona Mugshot Act encompasses the Grant Defendants’ exact
16 conduct. [See Compl. ¶ 12.] In fact, the Legislature and various stakeholders actually
17 discussed the exact types of websites at issue here during the committee hearings on the
18 proposed legislation.¹ Websites such as those operated by the Grant Defendants were
19 repeatedly mentioned as prime examples of the types of activity the Legislature sought
20 to enjoin when it drafted this legislation. The House Public Safety Committee
21 unanimously passed this legislation. *Id.* During the hearing, the state representatives
22 minced no words when describing mugshot website operators such as the Grant
23 Defendants. State Representative Campbell emphasized that the legislation was directed
24 against such “sleaze ball operators” (*Id.* at 19:00), and Committee Chairman Payne

26 ¹ See AZ HB2191 - criminal justice records; prohibited uses: Hearing Before the House
27 Public Safety Comm., Fifty-fourth Legislature 1st Regular. (2019, February 13).
28 Available at http://azleg.granicus.com/MediaPlayer.php?view_id=13&clip_id=22019.

1 declared that “[nobody] should be hampered by something like this.” (*Id.* at 19:34).
2 Chairman Payne further described these activities as “cruel, pure cruel.” (*Id.*).

3 Instead of ceasing their operations in the State of Arizona once the Legislature
4 deemed them unwelcome, the Grant Defendants and their pugnacious lawyer, Defendant
5 Gingras, decided to go down swinging. This resulted in the filing of several cases
6 involving the parties herein as well as other parties and law firms, some of which were
7 either dismissed by the plaintiffs or remanded, with one side favoring a State court
8 forum, and the Defendants favoring a federal court forum. In the end, Defendants failed
9 in their efforts to have these issues decided by a federal court, and there is ongoing state
10 court litigation.² In response, Defendants filed a groundless personal lawsuit against
11 Plaintiffs in the Arizona District Court (the “Federal Case”).³

12 **II. DEFENDANTS’ MOTION SHOULD BE DENIED**

13 **A. Plaintiffs should be allowed to pursue their claims against Defendants** 14 **without delay because the abatement doctrine is not applicable in this** 15 **case.**

16 Defendants argue that the Federal Case involves “identical parties and identical
17 claims arising from the same events.” [*See* Df. Mot. at 1:19-20.] As such, they conclude
18 that the compulsory counterclaim rule requires a stay of proceedings in this case until
19 the federal court has resolved the Federal Case, [*Id.* at 1:21-28.] Defendants’ argument is
20 based on the rule set forth in *Tonnemacher v. Touche Ross & Co.*, 920 P.2d 5, 186 Ariz.
21 125 (App. 1996). Defendants’ twisted logic in attempting to link two unrelated legal
22 concepts is unavailing, and this case should be allowed to proceed accordingly.

23
24 ² Plaintiff Andrew Ivchenko has two active lawsuits against the Grant Defendants in
25 Maricopa County Superior Court filed on behalf of his clients, including Case No.
26 CV2021-090059, filed January 6, 2021 (the “Appellate Case”), and Case No. CV2021-
090710, a class action on behalf of all Arizona victims of the Grant Defendants, filed on
February 12, 2021 (the “Class Action Litigation”).

27 ³ U.S. District Court for the District of Arizona, styled *Travis Grant, et al. v. Andrew*
28 *Ivchenko, et at.*, Case No. 21-CV-108 filed January 21, 2021 (the “Federal Case”).

1 Furthermore, Defendants have ulterior motives for trying to delay this case, as further
2 discussed herein, and this Court may consider such additional factors in making its
3 ruling. *Id.*, 920 P.2d at 10, 186 Ariz. at 130.

4 Defendants argue that this action should be abated because the same claim has
5 been previously filed in federal court. [See Df. Mot. at 14:16-18.] Even assuming that
6 Defendants' statement is true (it is not), this is not the law in Arizona, since "not every
7 later filed action abates." *Tonnemacher*, 920 P.2d at 8, 186 Ariz. at 128. Abatement is
8 limited to: 1) in personam actions that are brought in the same jurisdiction; and 2) in rem
9 and quasi in rem actions. *Id.* Since this case involves neither situation, the abatement
10 doctrine does not apply. Resolution of this issue renders Defendants' irrelevant
11 arguments concerning compulsory counterclaims in a federal lawsuit involving different
12 plaintiffs moot. Not only is this argument a red herring, Defendants do not cite a single
13 case linking the issue of compulsory counterclaims in a federal case as being the basis
14 for staying a state court case brought by the defendants in the federal case.

15 Defendants engage in a sleight of hand, glossing over the fact that the case law
16 they cite involves plaintiffs who initiated actions in two forums, whereas here the parties
17 are plaintiffs in one action and defendants in the other. *See Tonnemacher*, 920 P.2d at 7,
18 186 Ariz. at 127. As much as Defendants have a penchant for a federal forum, a plaintiff
19 is the master of her complaint, and a plaintiff (as here) can structure her complaint to
20 avoid a federal forum. *See Brooks v. Pre-Paid Legal Servs., Inc.*, 153 F.Supp.2d 1299,
21 1301 (M.D. Ala. 2001). For these reasons, and based on the rule set forth in
22 *Tonnemacher*, the abatement doctrine does not apply.

23 Additional reasons exist that warrant denying Defendants' request for a stay, and
24 will be discussed here to rebut Defendants' illogical argument attempting to get around
25 the dissimilar posture of the parties in the two cases in question by essentially
26 concocting a new legal theory involving compulsory counterclaims. [See Df. Mot. at
27 8:17-21.] The abatement rule does not apply to actions pending in different jurisdictions.

1 *Tonnemacher*, 920 P.2d at 8, 186 Ariz. at 128. If the prior action is pending in a different
2 state, for example, both actions may proceed simultaneously. *Id.* “The distinguishing
3 factor is that the courts within the same state operate under the same sovereign; the
4 courts in different states operate under different sovereigns ... and “neither sovereign is
5 required to yield to the other.” *Id.* This distinction applies to actions that are filed in both
6 federal and state court, since each court derives its authority from a separate and distinct
7 sovereignty. *Id.* (*quoting* 1 C.J.S. Abatement and Revival § 53, at 103 (1985)). “Because
8 the state and federal courts operate under different sovereigns, an action pending in a
9 federal court does not abate an action subsequently commenced in a state court.” *Id.* The
10 preferred course of action for two similar lawsuits pending in different jurisdictions is to
11 permit each sovereign to reach judgment and apply the findings of one to the other under
12 the principles of res judicata. *Id.* However, neither court will ever need to address this
13 issue here, because the parties, facts, and causes of action in the two cases are entirely
14 different (emphasis added). [*See* Df. Mot. at Exhibit A, ¶¶ 179-282; Compl. ¶¶ 143-225.]

15 For instance, the Federal Case includes two counts for malicious prosecution, this
16 case does not. *Id.* Moreover, the abuse of process claims of the parties involve entirely
17 different fact patterns and theories of law. *Id.* Defendants’ remaining claims (indeed, all
18 of their claims) are little more than “filler” designed to buttress a frivolous lawsuit that
19 was filed simply as an intimidation tactic that Defendants thought would work (but has
20 not), and will likely be dismissed on the pleadings. Indeed, Defendants admit as much
21 by arguing strenuously that the Federal Case involves a copyright issue, over which
22 federal courts have exclusive jurisdiction under 28 U.S. Code § 1338. [*See* Df. Mot. at
23 12:18-26.] However, Defendants cannot have it both ways. Defendants’ motion attempts
24 to litigate those issues here, primarily as part of their repugnant and transparent character
25 assassination strategy directed against Plaintiffs. As a result, Defendants admit that the
26 cases are entirely different, and should be allowed to proceed as parallel litigation.

1 Indeed, Defendants gloss over these issues that are prerequisites to the application
2 of the abatement doctrine, and skip right to the factors that could, within the discretion
3 of the court, warrant a stay assuming that the abatement doctrine even applies (emphasis
4 added). Here, it does not. Regardless, Defendants in their reply will deny this, so
5 Plaintiffs will address the issue. The *Tonnemacher* Court considered the policy concerns
6 involving dismissal of a complaint as well as the (not exhaustive) factors supporting a
7 stay if warranted by the circumstances. *Tonnemacher*, 920 P.2d at 10, 186 Ariz. at 130.
8 These issues are related, including unreasonable delays in the other forum, and the need
9 to provide interim relief, such as a temporary restraining order or a preliminary
10 injunction. *Id.*

11 The Federal Case, which involves entirely different facts, parties and theories of
12 law, is in the preliminary stages and has moved slowly.⁴ Plaintiffs intend to file a motion
13 to dismiss that frivolous case pursuant to Fed. R. Civ. P. 12(b) at their earliest
14 convenience. At this rate, however, it is unlikely the federal court will rule on a motion
15 to dismiss until well into next year. However, this case involves issues relating to
16 Defendants' ongoing and vicious cyber harassment of Plaintiffs, designed to cause
17 maximum reputational harm and (they hope) somehow derails pending state court
18 litigation. [See Compl. ¶¶ 94-105.] At the very least, Defendants have done everything in
19 their power to create a chilling effect designed to dissuade other affected parties
20 throughout the country from asserting their rights. [See Compl. ¶¶ 106-11, 113, 138,
21 177.] In this action, Defendants are finally being held to account for their misconduct.

22 Plaintiffs will require preliminary injunctive relief from this Court to stop this
23 ongoing harassment. [See Compl. ¶¶ 220-25.] Indeed, were a stay granted, Defendants'

25 ⁴ On March 31, 2021, Plaintiffs filed a Motion to Strike as well as a Motion for More
26 Definite Statement in the Federal Case. *See* Federal Case, *Docs* 20-21. The Court has yet
27 to rule on these preliminary motions.
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1 cyber harassment activities will likely escalate with impunity, and they will advertise it
2 as a “victory.” The considerations in granting or denying a preliminary injunction differ
3 from those involved in deciding whether to grant a stay, and merely finding that a stay
4 would further one or more valid objectives is insufficient to determine whether a
5 preliminary injunction is warranted. *Apache Produce Imports, LLC v. Malena Produce,*
6 *Inc.*, 247 Ariz. 160, 447 P.3d 341, 345 (Ariz. App. 2019). This is reason alone to deny
7 Defendants’ motion. Again, a stay is not warranted because the facts and causes of
8 action relating to Defendants’ abuse of process are different from that plead in the
9 Federal Case, and the abuse of process in this case is a predicate for the other causes of
10 action linking these Defendants, including civil conspiracy and aiding and abetting.
11 Thus, the factors identified in *Tonnemacher* do not apply here. *Tonnemacher*, 920 P.2d
12 at 10, 186 Ariz. at 130. Since Defendants will argue otherwise, Plaintiffs will address the
13 *Tonnemacher* factors.

14 Although the costs of a lawsuit are a factor, Defendants made the conscious
15 decision to engage in vexatious litigation tactics with the aim of draining Plaintiffs’
16 resources, as well as those of others they have litigated against. *Id.*; [See Compl. ¶¶ 56-
17 58, 143-56.] There is no harassment on the part of Plaintiffs by supposed repeated suits,
18 and as will be discussed, *infra*, Defendants lied to this Court about Plaintiff Andrew
19 Ivchenko’s role in past litigation involving them. Incredibly, Defendants want this Court
20 to believe they are the victims here, which would be laughable were it not so
21 reprehensible. The very nature of Defendants’ business activities causes several hundred
22 thousand Arizonans ongoing reputational and emotional harm, and is the object of the
23 Class Action Litigation. [See Compl. ¶¶ 8-10, 15-19.]

24 Although the judicial resources of this Court are being impacted, this case
25 involves the Arizona Mugshot Act and is related to the Class Action Litigation, and
26 appellate litigation, which impacts several hundred thousand people in this state. [*Id.* ¶
27 12.] These are matters of first impression. It is a worthy use of the Court’s resources, as
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1 the morale and productivity of countless Arizona residents (and hence, the state's tax
2 base) is adversely affected by the activities of a few internet thugs like the Grant
3 Defendants, who operate what amounts to the internet equivalent of a weapon of mass
4 destruction with impunity from Central Florida.⁵ [See Compl. ¶ 10.] This is why the
5 Legislature unanimously passed the Arizona Mugshot Act, and the Grant Defendants
6 continue to ignore the law and brazenly dare anyone to challenge them.

7 One cannot conclude that this case involves piecemeal litigation, either, because
8 Defendants are simply wrong in arguing that this case is identical to the Federal Case.
9 *Tonnemacher*, 920 P.2d at 10, 186 Ariz. at 130; *Montanore Mineral Corp. v. Bakie*, 867
10 F.3d 1160, 1167 (9th Cir. 2017) ("Piecemeal litigation occurs when different tribunals
11 consider the same issue, thereby duplicating efforts and possibly reaching different
12 results..."). With different parties, fact patterns and causes of action, it is unlikely that
13 any ruling will have a res judicata effect on the other, and even if it does, that alone is no
14 reason to grant a stay. *Tonnemacher*, 920 P.2d at 9, 186 Ariz. at 129. The Federal Case
15 is a diversity case, and the only reason Defendants tacked-on a copyright issue through
16 an amended complaint is when they realized Plaintiffs would fight the case, and that
17 their initial Rule 12 motions exposed the paucity of Defendants' claims and their real
18 motives for filing the lawsuit.⁶

19
20 ⁵ The Defendants are referred to as the "Grant Family" in the Motion, in an effort to
21 humanize these vile predators by trying to make them appear like The Brady Bunch.
22 However, several people are involved in the family's vast, nationwide mugshot website
23 operation, including Travis Paul Grant's brother, Defendant Kyle David Grant. [Compl.
24 ¶ 6.] Indeed, several online sites have been established by aggrieved parties to expose
25 the nefarious and illegal activities of these individuals, including
26 <https://rapsheetsorgkyledavidgrant.wordpress.com>, www.issuedbailbondshq.com, and
27 www.travispaulgrant.com. [See Compl. ¶¶ 24-25.]

28 ⁶ On March 12, 2021, Plaintiffs filed a Motion to Strike as well as a Motion for More
Definite Statement in the Federal Case, which were refiled after Defendants amended
their complaint. See Federal Case, Docs 11-14. The Court has yet to rule on these
preliminary motions.

1 Finally, as a diversity case, the Federal Case does not involve unusually difficult
2 questions of federal law that bear upon important policy issues, nor is there any
3 likelihood of conflicting judgments by state and federal courts. *Id.*, 920 P.2d at 10, 186
4 Ariz. at 130. In fact, this case includes a claim for violation of the Arizona Mugshot Act,
5 a matter of great policy interest within Arizona. [See Compl. ¶¶ 157-66.] There is a good
6 chance that the federal court would stay the proceedings pending the outcome of current
7 state court litigation⁷, or remand the case so that Arizona law can be developed. *Nature*
8 *Conservancy v. Machipongo Club, Inc.*, 579 F.2d 873, 875–76 (4th Cir. 1978) (Staying
9 proceedings, holding, “[W]e read *Louisiana Power & Light v. City of Thibodaux*, 360
10 U.S. 25, 79 S.Ct. 1070, 3 L.Ed.2d 1058 (1959), and *County of Allegheny v. Frank*
11 *Mashuda Co.*, 360 U.S. 185, 79 S.Ct. 1060, 3 L.Ed.2d 1163 (1959), as permitting
12 abstention in diversity cases where (1) state law is unsettled, and (2) an incorrect federal
13 decision might embarrass or disrupt significant state policies).

14 **B. Defendants have ulterior motives for trying to derail these proceedings.**

15 **i. Defendants are using the Federal Case to create a chilling effect**
16 **designed to dissuade others from asserting their rights against**
17 **them under the Arizona Mugshot Act.**

18 The *Tonnemacher* Court held that the enumerated factors that may be considered
19 by a superior court in a stay analysis are not exhaustive. *Tonnemacher*, 920 P.2d at 10,
20 186 Ariz. at 130. Thus, Plaintiffs request that the Court consider the various reasons
21 behind Defendants’ request (assuming the Court concludes this analysis is even
22 necessary in determining this motion, which Plaintiffs argue it is not). For one thing,
23 Defendants want a favorable ruling here because this lawsuit undermines their narrative
24 when threatening others with litigation. In this way, they create a chilling effect

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26 ⁷ The Federal Case includes a count for declaratory judgment involving the Arizona
27 Mugshot Act. [See Df. Mot., at Exhibit A, ¶ 252.]

1 dissuading others from asserting their legal rights against them, since federal cases are
2 published on the internet through independent websites. Defendants are under constant
3 threat of litigation simply due to the vast number of people they victimize nationwide.
4 [See Df. Mot. at Exhibit A, ¶ 16.] Defendants readily point out that they sued a lawyer
5 personally, and do not want to admit they also have been sued by that same lawyer.

6 The Federal Case is without merit, and asserts a veritable blizzard of confusing,
7 illogical and overlapping claims against Plaintiffs, including abuse of process and
8 malicious prosecution claims. [*Id.*, ¶¶ 250-59.] The case was filed just **three days**
9 (emphasis added) after Plaintiff Andrew Ivchenko, a licensed Arizona attorney, served
10 Defendants in a state court action filed on behalf of a client who was a party in a
11 previously dismissed case in this Court.⁸ Defendants thought that they had sidestepped
12 the legal actions that had halted their mugshot operations in Arizona. They were wrong,
13 and they reacted the only way they know how – attack people personally.

14 Defendant Gingras is known for filing frivolous lawsuits against attorneys and
15 parties that have brought suit against his clients, mostly predatory internet operators like
16 the Grant Defendants who cause the public immense harm. [See Compl. ¶¶ 113-16.] The
17 best known of these cases involved Xcentric Ventures LLC (which operates the
18 notorious Rip-off Report). See *Xcentric Ventures, LLC v. Borodkin*, 798 F.3d 1201 (9th
19 Cir. 2015). This groundless lawsuit was dismissed by the Court on the pleadings, and yet
20 still appealed by the plaintiffs, to no avail. Not having learned his lesson after wasting
21 years of the Courts’ time and resources in unsuccessfully attacking opposing counsel
22 and the parties in *Xcentric Ventures*, Gingras is up to his old tricks yet again, this time
23 on behalf of the Grant Defendants, notorious mugshot website operators who not only

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25 ⁸ Maricopa County Superior Court, styled *John Doe v. Travis Grant, et al.*, Case No.
26 CV2021-090059 filed January 6, 2021. This case is the subject of an appeal and cross
27 appeal, and the Arizona Attorney General has made an appearance on the plaintiff’s
28 behalf. See Court of Appeals, Division One, Case No. 1 CA-CV 21-0302.

1 victimize “tens of millions” of people, but who also are operating in violation of Arizona
2 law. [See Df. Mot. at Exhibit A, ¶ 16.]

3 In dealing with Plaintiffs, Defendant Gingras has repeatedly used the law as a
4 weapon on behalf of the Grant Defendants in order to create a chilling effect designed to
5 dissuade others from asserting their legal rights against them. [See Compl. ¶¶ 48-93.]
6 This has become Defendant Gingras’ *modus operandi*, and most attorneys, having dealt
7 with his incessant gaslighting, bullying and threats first-hand, have been too afraid of
8 him to do anything about it. [*Id.* ¶¶ 58, 91, 101.] Unfortunately for Defendants, Plaintiffs
9 are not afraid of any of them. Defendants are the ones who refused to litigate on the
10 merits, and accept that Plaintiff Andrew Ivchenko became the “go to” lawyer in Arizona
11 in the struggle against mugshot website operators. Instead, they gratuitously and
12 gleefully dragged Plaintiff Renee Ivchenko back into the litigation and continued to
13 savage her reputation after her case was over. [*Id.* ¶ 92.] Defendants crossed a line here.
14 While the pending state court litigation⁹ proceeds on the merits, it is time for Defendants
15 to receive their comeuppance for their illegal and unethical behavior.

16 **ii. Defendants engage in character assassination in an**
17 **underhanded attempt to persuade the Court to rule in their**
18 **favor.**

19 Defendants are trying to influence this Court by spending much of their brief
20 engaging in their usual (and nonsensical)¹⁰ character assassination of Plaintiffs in order

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22 ⁹ The Grant Defendants have dodged service in the Class Action Litigation, as well as
23 this case, for months, and refused to accept service though Defendant Gingras under
24 Ariz. R. Civ. P. 4.2. Plaintiffs will petition the court for alternative service under Ariz.
25 R. Civ. P. 4.1(k) soon.

26 ¹⁰ In their desperation to save their mugshot operation in Arizona, Defendants want this
27 Court to believe that Plaintiff Andrew Ivchenko, a retired Army Lieutenant Colonel with
28 an unblemished 32-year career in the law, is a bad actor and has engaged in unethical
behavior. This argument has little merit based on the record, and is especially galling
considering Defendants’ conduct and their checkered pasts. [See Compl., Exhibits A-B,
G.]

1 to deflect attention from themselves and their activities. Defendants are essentially
2 blaming Plaintiff Andrew Ivchenko for all of their legal problems, both in Arizona and
3 elsewhere. As such, Defendant Gingras blatantly lied to this Court in stating that
4 Plaintiff Andrew Ivchenko “commenced and/or instigated” nearly “a dozen” lawsuits,
5 including “eight such cases against the Grant Family here in Arizona.” [See Df. Mot. at
6 14:16-18.] The magnitude of this lie is dizzying. Plaintiff Andrew Ivchenko initiated
7 only one brief case against the Grant Defendants on behalf of his wife, Plaintiff Renee
8 Ivchenko. [See Compl. ¶¶ 43-47.] This was the first mugshot related case in Arizona
9 (and the first against the Grant Defendants anywhere), and ended quickly once they
10 complied with Plaintiffs’ demands. *Id.* Thus, Plaintiffs were the “first movers” against
11 the vast mugshot enterprise operated by the Grant Defendants. This opened the door for
12 others. The litigation escalated from there and eventually included other lawsuits
13 involving other parties and two additional law firms. [*Id.* ¶¶ 49, 99.]

14 To accuse Plaintiff Andrew Ivchenko of being responsible for every lawsuit in
15 Arizona and in other states against the Grant Defendants is simply an outrageous and
16 self-serving lie (emphasis added). Defendants are angry that Plaintiff Andrew Ivchenko
17 evolved his practice and continued the fight against mugshot website operators such as
18 the Grant Defendants on behalf of his clients. Instead of moving on and litigating on the
19 merits, Defendants made a conscious decision to drag Plaintiff Andrew Ivchenko’s wife,
20 Plaintiff Renee Ivchenko, back into the litigation to maintain a false narrative that this
21 legal initiative is revenge-based.

22 The second prong of Defendants’ strategy has involved engaging in egregious
23 cyber harassment of both Plaintiffs, essentially resurrecting Plaintiff Renee Ivchenko’s
24 claims against them. [*Id.* ¶¶ 92-98.] It begs the question – what was the purpose for
25 Defendants continuing to attack Plaintiff Renee Ivchenko? Why did Defendant Gingras
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1 procure her arrest video and arrest records, that the Grant Defendants then plastered all
2 over the home page of their Websites? [*Id.* ¶¶ 86-89.] Why did the Grant Defendants
3 establish websites in Plaintiffs' misappropriated names? [*Id.* ¶¶ 94-98.] Obviously, they
4 used Plaintiff Renee Ivchenko's relationship with Plaintiff Andrew Ivchenko to try and
5 gain leverage and undermine the attorney-client relationship by arguing that there was an
6 improper motive for pursuing these cases. [*Id.* ¶¶ 112, 120.] This was not only dirty
7 pool, but legally actionable.

8 Defendants hope that their smear job will somehow influence this Court to rule
9 in their favor. Indeed, these reprehensible and damaging actions by Defendants are the
10 reason Plaintiffs have responded with this lawsuit. The Legislature had good intentions
11 when they passed the Arizona Mugshot Act. What they failed to realize was the depths
12 of the depravity of those individuals who are classified as mugshot website operators
13 under the statute. A.R.S. 44-7901(4). These people make good money victimizing
14 millions nationwide, and are not about to give up their lucrative operations until such
15 time as a court enforces the law and holds them accountable. The lawyers and identified
16 clients who have fought these cases have had an unenviable task, and have faced
17 relentless personal attacks at the hands of Defendants. This Court need not take
18 Plaintiffs' word for it, but also may consider the experiences of another attorney. [*See*
19 Declaration of Steven Scharboneau in Support of Plaintiff's Motion to Proceed Under
20 Pseudonym, filed December 1, 2020 in Superior Court Case No. CV2020-055722;
21 attached hereto as Exhibit 1; Compl. ¶¶ 94-111.] Plaintiffs ask this Court to disregard
22 Defendants' repugnant conduct, and allow this case to proceed on the merits.

23 **iii. Defendants seek to delay this lawsuit in order the buttress their**
24 **unsustainable claims in the Federal Case.**

25 Defendants have done, and will do, anything in their power to derail Arizona state
26 court proceedings and get this case back to Federal court, where it has now been on three
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1 separate occasions through three different law firms (emphasis added)¹¹. All of these
2 cases were either dismissed by the plaintiffs or remanded, with one side favoring a state
3 court forum, and the Defendants favoring a federal court forum. In the Federal Case, the
4 Defendants included a count for declaratory relief, in which they ask the federal court to
5 make a declaratory judgment finding that the “publication of public records relating to
6 [Plaintiff] Renee Ivchenko, including but not limited to, bodycam footage, police
7 reports, and other public records, is protected speech under the First Amendment and is
8 not unlawful under any legal theory recognized in the State of Arizona.” [See Df. Mot. at
9 Exhibit A, pg. 33, ¶ 259.]

10 The problem Defendants have is that their request for Declaratory Relief fails as a
11 matter of law in that it improperly seeks declaratory relief involving issues pending in
12 another forum. “[A] court may refuse to render or enter a declaratory judgment or decree
13 where such judgment or decree, if rendered or entered, would not terminate the
14 uncertainty or controversy giving rise to the proceeding.” A.R.S. § 12-1836; *accord*
15 *Merritt-Chapman & Scott Corp. v. Frazier*, 92 Ariz. 136, 139, 375 P.2d 18, 20 (1962).
16 “It was never intended that the relief to be obtained under the Declaratory Judgment Act
17 should be exercised for the purpose of trying issues involved in cases *already pending*
18 (emphasis added).” *Ibid.* (citation omitted).

19 Defendants have a similar problem (among many) with their malicious
20 prosecution claims in the Federal Case (which is only directed against Plaintiffs, not any
21 of the other 40 plaintiffs involved in those cases), in that a plaintiff must show that there
22 was a favorable termination of the prior proceedings. *Bradshaw v. State Farm Mut.*
23 *Auto. Ins. Co.*, 157 Ariz. 411, 417, P.2d 1313, 1319 (Ariz. 1988). The Class Action
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25 ¹¹ Case No. 20-CV-00674, removed to the Arizona District Court on April 3, 2020.
26 Plaintiffs were represented by Dickinson Wright PLLC. Case No. 20-CV-01142,
27 removed to the Arizona District Court on June 9, 2020. Plaintiffs were represented by
28 Andrew Ivchenko PLLC. Case No. 20-CV-02045, removed to the Arizona District Court
on October 23, 2020. Plaintiffs were represented by the Rosenstein Law Group.

1 Litigation on behalf of all Arizona victims of the Grant Defendants negates those causes
2 of action as a matter of law. *Id.* However, Defendants will likely argue that Plaintiff
3 Renee Ivchenko is not a member of the class. Thus, they need to forestall this complaint
4 to avoid an almost certain Rule 12(b)(6) dismissal. *Id.*

5 Defendants' motion is simply another attempt to get a federal court to buy off on
6 their substantive legal arguments, and is not allowed under Arizona law. *Merritt-
7 Chapman & Scott Corp.*, 92 Ariz. at 139. As a result, the Defendants need this Court to
8 rule in their favor so that they have an avenue to get out of state court, and thereby not
9 be precluded from seeking a declaratory judgment in federal court. *Id.* Enough is enough
10 already with the Defendants and their antics. These online predators have engaged in
11 "scorched-earth" tactics for the past eighteen months in order to continue their
12 nationwide scam which has been going on for years and has harmed millions. It is time
13 to hold them accountable in this Court.

14 **iv. Defendants seek to delay this lawsuit in order to buy time to
15 move their mugshot operation offshore.**

16 In previous pleadings, the Grant Defendants stated that Defendant Travis Paul
17 Grant was the sole owner and principal of the Websites. [See Exhibit 2, sworn affidavit
18 of Defendant Travis Paul Grant, ¶ 3]. Defendant Kye David Grant also executed a sworn
19 affidavit in a similar case in Florida. [See Exhibit 3, sworn affidavit of Defendant Kyle
20 David Grant.] Defendant Kye David Grant swore under oath that his brother Travis Paul
21 Grant owned the Websites and he was just an employee. [*Id.*, ¶¶ 3-4, 7]. Defendant
22 Mariel Lizette Grant executed a sworn affidavit in which she acknowledged her
23 husband's ownership of the Websites, but denied any role in their operation. [See
24 Exhibit 4, sworn affidavit of Defendant Mariel Lizette Grant, ¶¶ 3-7.] As he often does,
25 Defendant Gingras threatened Plaintiff Andrew Ivchenko with Rule 11 sanctions in
26 relation to Defendant Mariel Lizette Grant's affidavit. [See Exhibit 5, letter from David
27 S. Gingras, dated January 22, 2021.] However, the Grant Defendants committed perjury
28

1 by grossly misrepresenting their roles in the family mugshot enterprise. These affidavits
2 were filed to get two of the Defendants (Kyle David Grant and Mariel Lizette Grant)
3 removed from pending litigation so that they could shift their assets and limit their
4 exposure to one person in the family mugshot enterprise, namely, Travis Paul Grant.

5 Defendants make a big deal about a previous settlement offer allegedly involving
6 “\$2.4 million.” [See Df. Mot. at 7:22-28.] In order to support their claims in the Federal
7 Case, Defendants reference a compromise offer in violation of Fed. R. Civ. P. 408 that
8 does not even show what they claim. The 20 plaintiffs involved in the case had a
9 statutory claim under the Arizona Mugshot Act of over \$3.5 million, and the offer was
10 for \$240,000, less than ten cents on the dollar. See A.R.S. § 44-7902(D). This is another
11 self-serving lie designed to somehow make Plaintiff Andrew Ivchenko look bad.
12 (Defendants do not explain how an attorney going to bat for his clients in a civil case is
13 wrong.) Regardless, what is important is that this offer involved only 20 clients. The
14 Class Action Litigation involves several hundred thousand clients (emphasis added).

15 The Grant Defendants know that their ship is sinking, especially now that they
16 are on the radar of the Arizona Attorney General in the Appellate Case. To make matters
17 worse for them, their home state of Florida recently amended its mugshot statute to close
18 a loophole the Grant Defendants were using to avoid liability in that state. [See Exhibit
19 6, Florida SB 1046, effective October 1, 2021.] Defendant Travis Paul Grant is also
20 being sued there in connection with the Websites. [See Case No. 2021-CA-000960,
21 Seminole County, Florida, Circuit Court, Eighteenth Judicial Circuit). These two
22 statutes, and the related lawsuits, represent extinction events for the Grant Defendants
23 and their mugshot enterprise.

24 Like rats preparing to jump from a sinking ship, the Grant Defendants have a
25 plan. Jump ship to Panama and keep the scam going! On June 10, 2021, the Grant
26 Defendants established a corporation in Panama called Rapsheets, Corp. [See Exhibit 7.]
27 The Grant Defendants periodically change the names of their websites to enhance their
28

Google rankings, and have operated under www.rapsheetz.com and www.rapsheets.org, both of which now redirect to their main site at www.publicpolice-record.com. [See Exhibit 2, ¶ 3.] Significantly, the three Grant Defendants are named as directors of the corporation, as well as key officers. [See Exhibit 7.] Defendant Kyle David Grant, who in his affidavit swore that he simply performs “administrative/customer service tasks” is named as a director and “presidente.” *Id.* Despite what they swore under oath, all three Grant Defendants are intimately involved in the family mugshot enterprise. Besides lying under oath, the Grant Defendants obvious plan to escape liability belies their real reasons for seeking to delay this action, namely, to give them more time to effect their plans and leave their victims in Arizona without recourse. None of these actions should be rewarded, and Defendants’ motion should be denied for these reasons alone.

III. CONCLUSION

Instead of ceasing their destructive activities in Arizona once the Arizona Mugshot Act was enacted, the Grant Defendants and their proxy, Defendant Gingras, declared war on our citizenry. They thought they would have a “splendid little war”¹² that would allow the Grant Defendants to keep profiting from their ongoing cyber harassment of our citizenry, in the process condemning the reputations of hundreds of thousands of people to eternal damnation. However, wars are unpredictable, and Defendants brought this one upon themselves. They made their own bed here, and should live with the consequences. Consequently, and for the reason set forth herein, Defendants’ motion should be denied, and this case should be allowed to proceed.

DATED: September 8, 2021.

ANDREW IVCHENKO PLLC

By: /s/ Andrew Ivchenko
Andrew Ivchenko, Esq.
Attorney for Plaintiffs

¹² John Milton Hay, on the Spanish-American War of 1898.

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on the 8th day of September, 2021, with the Clerk of the Maricopa County Superior Court using AZTurboCourt.

David S. Gingras, Esq.
GINGRAS LAW OFFICE, PLLC
4802 E. Ray Road, #23-271
Phoenix, Arizona 85044
Attorney for Defendants

EXHIBIT 1

1 Craig J. Rosenstein, Esq. (024766)
2 **ROSENSTEIN LAW GROUP, PLLC**
3 8010 E McDowell Rd., Suite # 111
4 Scottsdale, Arizona 85250
5 Telephone: (480) 248-7666
6 Facsimile: (480) 946-0681
7 Attorney for Plaintiff

8 **ARIZONA SUPERIOR COURT**

9 **MARICOPA COUNTY**

10 JOHN DOE,

11 Plaintiff,

12 vs.

13 TRAVIS PAUL GRANT et al.,

14 Defendants.

Case No. CV2020-055722

**DECLARATION OF STEVEN
SCHARBONEAU IN SUPPORT OF
PLAINTIFF'S MOTION TO
PROCEED UNDER PSEUDONYM**

HON. JAMES SMITH

15
16 1. My name is Steven Scharboneau and I am an Arizona attorney, along with
17 other attorneys from the Rosenstein Law Group, PLLC, representing the Plaintiff in the
18 above-captioned case, and make these statements based on my own personal knowledge.

19 2. Prior to my involvement in litigation with Defendants, they had published
20 my criminal justice information from an arrest that had occurred in 2004. After sending
21 the Defendants letters requesting that they remove my criminal justice information in
22 mid-2019, they eventually complied with these requests—removing all information
23 resulting from my 2004 arrest.

24 3. Upon learning of my involvement in drafting, lobbying and eventually
25 shepherding what is now Arizona Revised Statutes §§ 44-7901, 7902 into law, and
26 following our firm's initial conversation with the attorney for Defendants (David
27
28

1 Gingras), on October 2, 2020 notifying him that we represent the clients who had
2 initiated a lawsuit against Defendants in a separate matter from this one, Defendant's
3 retaliated against me by posting my mugshot on the front page of their commercial
4 mugshot website, www.publicpolicerecord.com, and published a harassing, damaging and
5 defamatory story about my family and I.

6 4. Following a hyperbolic and misleading narration of events which took
7 place on the date of my arrest when I was seventeen years-old, Defendants go on to
8 include several other sections, misrepresenting my family and I to the public. For
9 example, one such section includes the following:
10

11 Stephen Scharboneau came from a broken home. His parents divorced
12 when he was just a toddler. Stephen Scharboneau father was a raging
13 alcoholic and used to beat him. The apple didn't fall from the tree as
14 Stephen was also drinking to intoxication and using marijuana. At the time
15 of his arrest, he could only read at a 6th grade level. His mother was never
16 in his life. He did try to live with her during his teens but it never "worked
17 out"

18 5. Upon information and belief, Defendants posted the aforementioned
19 information the day after our discussion with their attorney, Mr. Gingras.

20 6. It is clear from the timeline of events and communications with the parties
21 involved that the reposting of my criminal justice information by Defendants was meant
22 to harass and intimidate me and was retaliatory in nature.

23 7. Mr. Gingras acknowledged that his clients had published this information
24 and when confronted about it, Mr. Gingras responded in an email to Craig Rosenstein,
25 attorney for Plaintiff, that while he does not condone this behavior, "it kind of makes
26 sense that my clients have responded this way against Steven." Mr. Gingras further
27 stated in his email to Mr. Rosenstein regarding the publication of the aforementioned
28

1 information that: "a civil suit is very much like a declaration of war, and if you declare
2 war on someone, you shouldn't expect a warm and fuzzy response."

3 8. Our firm represents one other client against Defendants, a case which is in
4 The United States Federal Court, District of Arizona. *See* Case 2:20-cv-02045-SPL.
5 Despite efforts to conceal the client's identity in this matter, Defendants along with Mr.
6 Gingras assumed who the Jane Doe Plaintiff was. In retaliation, Defendants included her
7 mugshot and criminal justice information on the front page of their website,
8 www.publicpolicerecords.com. Furthermore, Mr. Gingras has included hyperlinks to the
9 individual who he assumed is the Plaintiff's mugshot and criminal justice information in
10 his pleadings and used her name in captions despite her filing under Jane Doe.
11

12 9. I am aware of one other attorney who has engaged in civil litigation with
13 Defendants and Defendants have engaged in similar harassing and intimidating conduct
14 with his wife, who was also engaged in litigation with Defendants.

15 10. I declare under penalty of perjury that the foregoing is true and correct.

16
17 **DATED** this 1st day of December, 2020.

18 Respectfully submitted,

19
20
21 By: 

22 Steven Scharboneau
23 Attorney for Plaintiff
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27
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EXHIBIT 2

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David@GingrasLaw.com

Attorney for Defendants
Travis Paul Grant and Mariel Lizette Grant

SUPERIOR COURT OF ARIZONA
COUNTY OF MARICOPA

Jane Doe,
Plaintiff,
vs.
Travis Paul Grant, *et al.*,
Defendants.

Case No. CV2021-090059

**AFFIDAVIT OF TRAVIS GRANT IN
SUPPORT OF DEFENDANTS'
MOTION TO DISMISS FOR LACK
OF PERSONAL JURISDICTION**

(Assigned to Hon. Tracy Westerhausen)

I, Travis Grant, hereby state and declare as follows:

1. My name is Travis Grant. I am a United States citizen, a resident of the State of Florida, am over the age of 18 years, and if called to testify in court or other proceeding I could and would give the following testimony which is based upon my own personal knowledge.

2. I am aware that I am currently a defendant in this matter. I have reviewed the Complaint filed in this case, and I have personal knowledge of the following facts.

3. I am currently the owner and operator of several websites including www.RapSheets.org, www.RapSheetz.com, www.BailBondSearch.com and www.PublicPoliceRecord.com (the "Sites"). The Sites contain a database comprised of tens of millions of public records from 45 different U.S. states

1 4. The only states *not* represented in the index are Alaska, Delaware, Hawaii,
2 Massachusetts and Vermont. The Sites do not, however, contain information about
3 *federal* criminal arrests or cases because that information is not regularly published on
4 the Internet by federal law enforcement agencies.

5 5. I am aware from the pleadings in this case that Plaintiff John Doe claims he
6 was arrested by the Maricopa County Sheriff's Office in March 2018 and that at or
7 around the time of his arrest, his mugshot was taken by MCSO and published on
8 MCSO's website.

9 6. I understand that Plaintiff further alleges that after his mugshot was
10 published online by MCSO, that photo and related arrest information was republished on
11 one or more of my websites.

12 7. The way my websites operate is very simple. First, an individual is arrested
13 and their mugshot and arrest details are published on the Internet by the arresting agency.
14 Using Maricopa County as an example, the Sheriff's Office publishes this information on
15 its website at: <https://www.mcso.org/Mugshot/>.

16 8. After this information is published online by the arresting agency, my
17 system uses software to automatically copy and compile the records into our database.

18 9. As of February 2021 that database contains in excess of 20 million records,
19 and thousands of new records are automatically compiled every day as they are released
20 by the arresting agencies in each state we cover. Due to the volume of records involved, I
21 do not personally review any of the individual records unless a specific need to do so
22 arises

23 10. Pages appearing on the Sites contain advertisements from Google's
24 AdSense program. I have used Google's AdSense program for many years, and I am
25 personally familiar with how the program works and how it displays advertisements.

26 11. The Sites generally use a standard page template which displays Google
27 AdSense ads in several different locations on each page. Three of these locations are
28 shown circled in RED below, and more ads were also located lower down the page.


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The screenshot shows the RapSheets.org website. The main content area displays 'Phoenix Arrest Records for Inmate RENEE RACHELLE IVCHENKO' with a 'DISMISSED' status. Below this is a 'PUBLIC RECORDS SEARCH' form with fields for 'First Name' and 'Last Name', and a 'Start Search' button. To the right of the form is a mugshot of Renee Rachel Ivchenko. Below the mugshot is another 'DISMISSED' status. At the bottom of the main content area is a 'Phoenix (Maricopa County) AZ Jail Arrest Details' section with a 'SEARCH PUBLIC RECORDS BY NAME' form. The sidebar on the right contains a 'Local Jail Inmate Search' section and a 'Sponsored Ads' section. The 'Sponsored Ads' section lists four ads: '1 | Access Court Records', '2 | Search Public Records Now', '3 | Arrest Records: 2 Secrets', and '4 | Type A Name, Then Search'. Three AdSense ads are highlighted with red boxes and arrows: Ad #1 (Public Records Search), Ad #2 (Sponsored Ads), and Ad #3 (Search Public Records by Name).

AdSense Ad #1

AdSense Ad #2

AdSense Ad #3

18 12. Google AdSense ads always contain a small blue triangle (example: ) in
19 the upper-right corner of the ad which is an industry-standard notification that indicates
20 the advertising content displayed is from Google's AdSense program. These blue
21 triangles are visible in the example above, and in every Google ad appearing on the Site.

22 13. The contents of each Google AdSense ad are created and controlled solely
23 by Google and/or its advertising customers, not by me or anyone working for me.

24 14. Putting technical details aside, I think the simplest way to explain how
25 Google AdSense ads work is like this—I am essentially renting “billboard space” on my
26 websites to Google. Google chooses which ads to display on these billboards, and Google
27 pays me to allow it to use that space. The amount of income I receive is based on the
28 number of views each page, and each ad, receive.

1 15. As the “landlord” (i.e., the website owner), I can control the location where
2 these Google ads/billboards appear on the Sites, and technically I can choose to remove
3 ads by opting-out of the AdSense program at any time, but all other aspects of the ads are
4 controlled by Google, not by me. The actual contents of each ad are created by Google’s
5 advertising customers (subject to Google’s Terms of Service), and the decision regarding
6 which ads to show to which viewer is made by Google’s algorithm. I have no role
7 whatsoever in that process.

8 16. Google’s algorithm for displaying ads is a closely-guarded trade secret, but
9 my understanding is that Google chooses which ads to display based on a wide variety of
10 personalized factors such as the location of the individual viewer and their personal
11 search history. For example, if a person was recently running many Google searches for
12 “new cars”, they might see an ad from a new car dealer or manufacturer when they visit
13 my Sites.

14 17. Because Google customizes (or has the ability to customize) ads to each
15 individual viewer, it is entirely possible that different people visiting the same page may
16 see different ads depending on various factors. I have no control of any kind over those
17 factors or how Google chooses to display ads.

18 18. Google ads are the only form of paid ads that I used on the Sites from 2018
19 to the present.

20 19. I do not now, nor have I ever, specifically tailored my advertising towards
21 the State of Arizona.

22 20. I do not own any property in Arizona, I do not sell any products/services in
23 Arizona, and thus I do not have, nor have I ever had, any customers in Arizona, and
24 beyond running my websites from Florida, I do not conduct any other business activities
25 in Arizona. As far as I am aware, I do not earn any revenue from Arizona, but due to the
26 way Google ads work, I cannot know this for certain.

27 21. It is entirely possible that an advertising customer in Arizona might pay
28 Google to display a specific Arizona-related ad through Google’s network, and it is

possible that Google might choose to cause that ad to appear on my websites. If this occurred, it would happen without my knowledge and without my participation.

22. Google AdSense ads are the sole and exclusive source of revenue earned by the Sites.

23. Each mugshot page on the Sites contains a disclaimer which includes the following language:

DISCLAIMER NOTICE: **RAPSHEETS.ORG WEBSITE DOES NOT SOLICIT OR ACCEPT A FEE OR ANY FORM OF PAYMENT TO TAKE DOWN ARREST RECORDS INFORMATION.** INFORMATION POSTED ON THIS WEB SITE IS PROVIDED FOR INFORMATIONAL PURPOSES ONLY. IT IS SUBJECT TO CHANGE AND MAY BE UPDATED PERIODICALLY. WHILE EVERY EFFORT IS MADE TO ENSURE THAT THE POSTED INFORMATION IS ACCURATE, IT MAY CONTAIN FACTUAL OR OTHER ERRORS. INMATE INFORMATION CHANGES QUICKLY AND THE POSTED INFORMATION MAY NOT REFLECT THE CURRENT INFORMATION. ALL ARE PRESUMED INNOCENT UNTIL PROVEN GUILTY IN A COURT OF LAW. PUBLISHED MUGSHOTS AND/OR ARREST RECORDS ARE PREVIOUSLY PUBLISHED PUBLIC RECORDS OF: AN ARREST, A REGISTRATION, THE DEPRIVATION OF LIBERTY OR A DETENTION. THE MUGSHOTS AND/OR ARREST RECORDS PUBLISHED ON RAPSHEETS.ORG ARE IN NO WAY AN INDICATION OF GUILT AND THEY ARE NOT EVIDENCE THAT AN ACTUAL CRIME HAS BEEN COMMITTED. EVERY EFFORT IS MADE TO ENSURE THE ACCURACY OF INFORMATION POSTED ON THIS WEBSITE. HOWEVER, RAPSHEETS.ORG DOES NOT GUARANTEE THE ACCURACY OR TIMELINESS OF THE CONTENT OF THIS WEBSITE. IN ADDITION NAMES MAY BE SIMILAR OR IDENTICAL TO OTHER INDIVIDUALS. FOR LATEST CASE STATUS, CONTACT THE OFFICIAL LAW ENFORCEMENT AGENCY WHICH ORIGINALLY RELEASED THE INFORMATION. NO WARRANTY EXPRESSED OR IMPLIED IS MADE REGARDING THE ACCURACY, ADEQUACY, COMPLETENESS, LEGALITY, RELIABILITY, OR USEFULNESS OF ANY INFORMATION.

24. Prior to the commencement of this lawsuit, I did not know the Plaintiff and I had no idea that she was a resident of Arizona. Indeed, my only knowledge is that Plaintiff claims to currently reside in Arizona. I have no idea if he/she was actually living in Arizona at the time of her arrest as that information was not released by MCSO when it published Plaintiff's mugshot and arrest information online.

25. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

Executed on February 17, 2021.



Travis Grant

EXHIBIT 3

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR SEMINOLE COUNTY, FLORIDA

JOHN DOE,
Plaintiff,

CASE NO.: **2021-CA-000960**

vs.

GAINESVILLE CONSOLE DOCTOR LLC, *et al.*,
Defendants

**AFFIDAVIT OF KYLE GRANT
IN SUPPORT OF DEFENDANT
GAINESVILLE CONSOLE DOCTOR, LLC'S
MOTION FOR MORE DEFINITE STATEMENT**

I, Kyle David Grant, hereby state and declare as follows:

1. My name is Kyle David Grant. I am a United States citizen, am over the age of 18 years, and if called to testify in court or other proceeding I could and would give the following testimony which is based upon my own personal knowledge.

2. I have reviewed the Complaint filed in this case as well as Plaintiff's Response to Defendants' Motion for More Definite Statement and the supporting affidavits of Steven Ames, Stephen/Steven Scharboneau, and Andrew Ivchenko.

3. My brother is Travis Paul Grant who I understand is a co-defendant in this matter. Travis owns and operates several websites including www.PublicPoliceRecord.com and www.BailBondsHQ.com.

4. Since May 2018, I have worked for my brother performing various administrative/customer service tasks relating to his websites.

5. Both PublicPoliceRecord.com and BailBondsHQ.com function in exactly the same way. Both of these websites archive, index, and display public arrest records which are published on the Internet by various law enforcement agencies.

6. In short, after a person is arrested, their mugshot and arrest information is often published on the Internet by the arresting agency. Using software, my brother's websites automatically gather this information and compile it together into a single database of arrest records. As of July 2021, that database contains more than 20 million arrest records from 45 different U.S. states, including Florida.

7. As a general rule, my brother's websites only display mugshots that were previously published on the Internet by the arresting agency. In other words, my brother and I do not go out and contact law enforcement agencies and ask them to provide us with copies of non-public mugshots or other arrest records which are *not* already published on the Internet. Rather, we only archive mugshots and arrest records that are currently available online from the arresting agency's website.

8. In this way, my brother's websites function in a manner that is very similar, if not identical, to search engines like Google. Google does not contact law enforcement agencies and request copies of mugshots or other content that is not available online. Instead, just like my brother's websites, Google uses software that "crawls" publicly-available websites and creates an index of all content it finds, including mugshots and arrest records. Google then displays that content in response to search queries containing the name(s) of any person with a mugshot in Google's index. This is exactly what my brother's websites do, albeit only with respect to arrest records.

9. I am aware that in his affidavit filed in this case, Mr. Ames states that prior to the filing of this lawsuit, in or around March 2021, he viewed one of my brother's websites, www.BailBondsHQ.com and saw the mugshot of his client appearing on that site.

10. Mr. Ames next claimed that he ran the same search for his client's mugshot on www.PublicPoliceRecord.com around the same time frame, but he did NOT find his client's mugshot on that site at the time.

11. Finally, Mr. Ames claims that after this lawsuit was filed, in April 2021 he ran a search for his client's name on www.PublicPoliceRecord.com and found that his client's mugshot DID appear on that site.

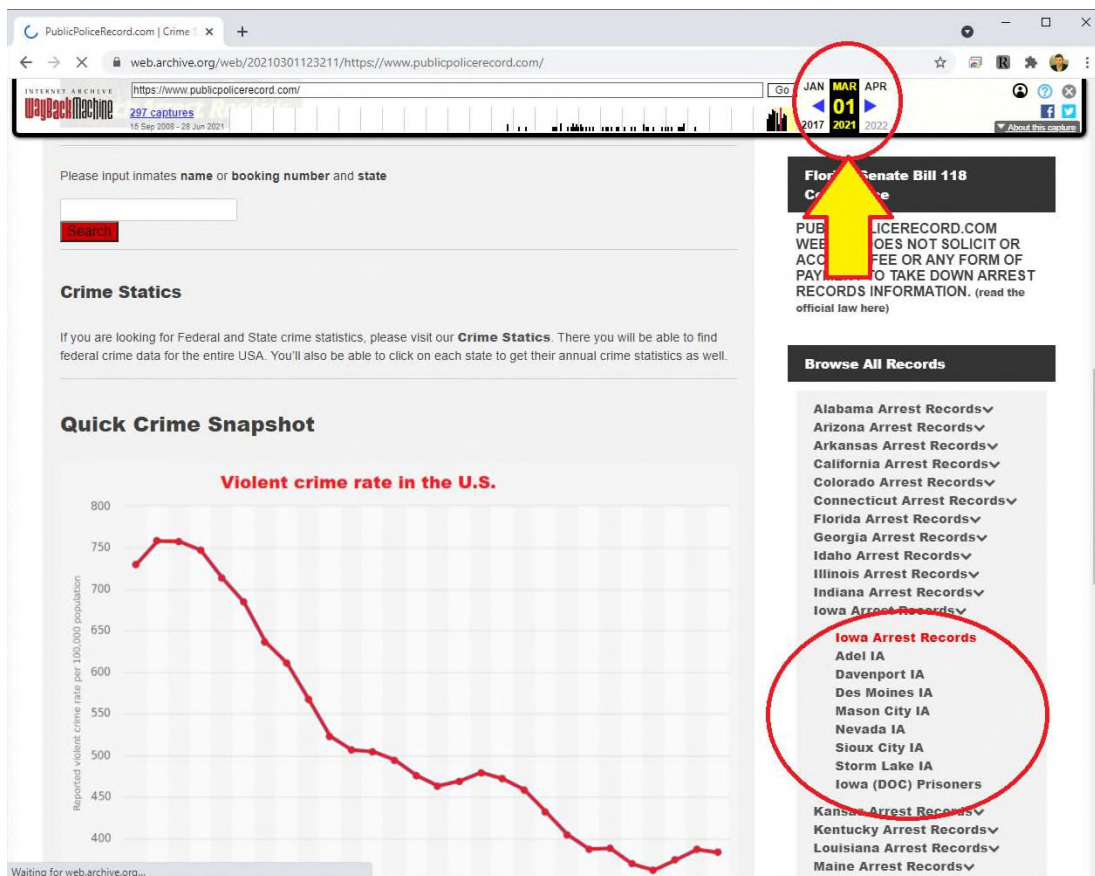
12. I understand that based on these "facts" to which Mr. Ames has testified, Plaintiff claims that my brother (or I) have "retaliated" against him for the filing of this lawsuit by causing arrest records from the State of Iowa to appear on www.PublicPoliceRecord.com which were not displayed on that site prior to the commencement of this action.

13. I have no idea who Mr. Ames is, nor do I have any idea who his client is. Accordingly, I have no knowledge regarding what Mr. Ames did or did not see on his computer in March and April 2021. However, to the extent Mr. Ames has suggested that www.PublicPoliceRecord.com did not contain arrest records from the State of Iowa prior to the commencement of this action, I have personal knowledge that Mr. Ames's suggestion is 100% false.

14. The reason I know this is two-fold. First, both www.PublicPoliceRecord.com and www.BailBondsHQ.com use the same arrest records database. That was true prior to March 2021, and it remains true today. For that reason, any arrest records appearing on www.PublicPoliceRecord.com also appear on www.BailBondsHQ.com, and vice versa.

15. The second reason that I know Mr. Ames's suggestion is false is that it is possible to independently verify his story using Archive.org. Archive.org is a third-party website that creates and preserves copies of websites as they appeared on a specific date in the past. Using Archive.org, it is possible to "go back in time" and look at a specific website on a specific date to see what content it contained.

16. Below is a screenshot from Archive.org showing www.PublicPoliceRecord.com as it appeared on March 1, 2021, before this action was filed. This image clearly shows the site contained arrest records from Iowa.




17. Because I do not know the true identity of the Plaintiff in this matter, I cannot use Archive.org to independently verify that his mugshot appeared on both www.PublicPoliceRecord.com and www.BailBondsHQ.com prior to the filing of this case, but to the best of my knowledge, there is absolutely no basis to suggest otherwise.

18. In addition, even if I knew Plaintiff's identity, I see no reason why moving his mugshot from one website to another would be an effective way to "retaliate" against him. Whether his mugshot appears on one website, two websites, or 100 websites does not seem to make any difference (it certainly makes no difference to me).

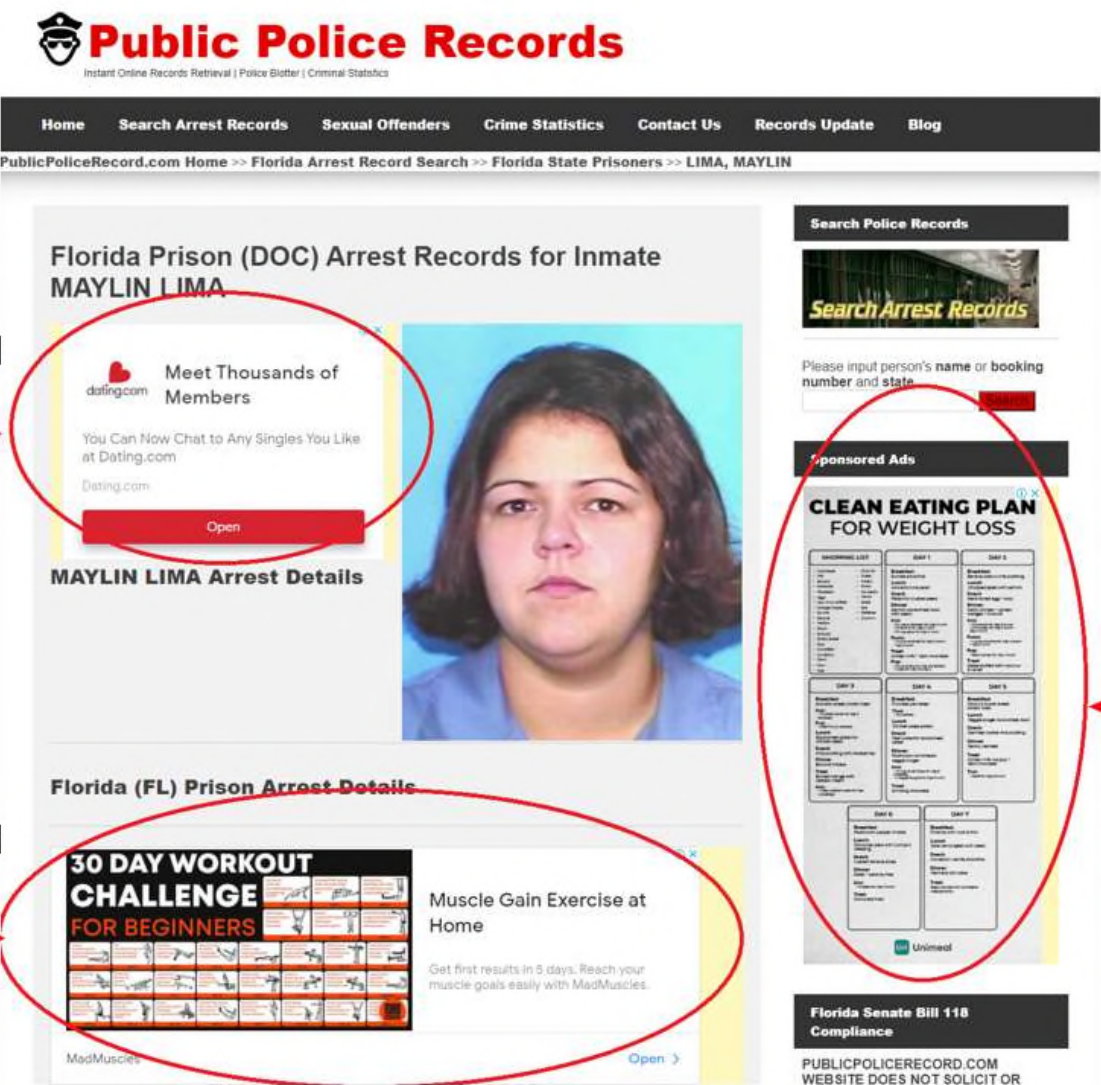
19. One final point – I am aware that Plaintiff's Complaint alleges that my brother's websites use mugshots and arrest records "to create original content in the form of advertisements", Compl. ¶ 5, and that "By publishing Plaintiff's name and likeness, Defendants are directly promoting their products" Compl. ¶ 46. Both of these statements are completely and totally false.

20. My brother's websites do not use mugshot or arrest records to "create original content in the form of advertisements", nor does my brother use his websites to sell any products or services of his own.

21. Instead, the sole source of income generated from my brother's websites is from "Google Ads". Google Ads are small ads created by third parties who, in turn, pay a fee to Google in order to display those ads on any websites that participate in Google's AdSense program, which my brother's websites do. Google then pays a fee to website owners like my brother based on the number of times each ad is viewed.

22. Google AdSense ads always contain a small blue triangle and/or a blue letter “X” (example: ) in the upper-right corner of the ad which is an industry-standard notification to show the advertising content displayed is from Google’s AdSense program.

23. Below is an example of a standard page from PublicPoliceRecord.com which contains three Google Ads which have been circled in red for clarity.



The screenshot shows the Public Police Records website. The header includes the site logo and navigation links. The main content area displays arrest records for MAYLIN LIMA. Three Google Ads are highlighted with red circles and labels:

- Google Ad #1:** A dating.com advertisement titled "Meet Thousands of Members" with a red "Open" button.
- Google Ad #2:** A MadMuscles advertisement titled "30 DAY WORKOUT CHALLENGE FOR BEGINNERS" featuring a grid of exercise images and a blue "Open" button.
- Google Ad #3:** A Unimeal advertisement titled "CLEAN EATING PLAN FOR WEIGHT LOSS" showing a table of meal plans.

The table in Google Ad #3 is as follows:

| MEASUREMENT LIST | DAY 1 | DAY 2 |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Breakfast | 1 cup of oatmeal, 1/2 cup of blueberries, 1/2 cup of milk | 1 cup of oatmeal, 1/2 cup of blueberries, 1/2 cup of milk |
| Lunch | 1 cup of quinoa, 1/2 cup of black beans, 1/2 cup of corn, 1/2 cup of tomatoes, 1/2 cup of onions, 1/2 cup of garlic, 1/2 cup of olive oil | 1 cup of quinoa, 1/2 cup of black beans, 1/2 cup of corn, 1/2 cup of tomatoes, 1/2 cup of onions, 1/2 cup of garlic, 1/2 cup of olive oil |
| Dinner | 1 cup of quinoa, 1/2 cup of black beans, 1/2 cup of corn, 1/2 cup of tomatoes, 1/2 cup of onions, 1/2 cup of garlic, 1/2 cup of olive oil | 1 cup of quinoa, 1/2 cup of black beans, 1/2 cup of corn, 1/2 cup of tomatoes, 1/2 cup of onions, 1/2 cup of garlic, 1/2 cup of olive oil |
| Snack | 1/2 cup of almonds, 1/2 cup of apples, 1/2 cup of bananas, 1/2 cup of oranges, 1/2 cup of pears, 1/2 cup of grapes, 1/2 cup of kiwis, 1/2 cup of peaches, 1/2 cup of plums, 1/2 cup of cherries, 1/2 cup of strawberries, 1/2 cup of raspberries, 1/2 cup of blueberries, 1/2 cup of blackberries, 1/2 cup of raspberries, 1/2 cup of blueberries, 1/2 cup of blackberries | 1/2 cup of almonds, 1/2 cup of apples, 1/2 cup of bananas, 1/2 cup of oranges, 1/2 cup of pears, 1/2 cup of grapes, 1/2 cup of kiwis, 1/2 cup of peaches, 1/2 cup of plums, 1/2 cup of cherries, 1/2 cup of strawberries, 1/2 cup of raspberries, 1/2 cup of blueberries, 1/2 cup of blackberries, 1/2 cup of raspberries, 1/2 cup of blueberries, 1/2 cup of blackberries |

24. The practice of displaying mugshots on websites that happen to contain Google Ads is extremely common. For example, the website of the Ocala Post contains a “mugshot gallery” which displays hundreds of mugshots and arrest records on pages which also contain Google Ads. See: <https://www.ocalapost.com/florida-mugshots/>


25. I understand that in this case, Plaintiff has argued that my brother has “no plausible defense” to Plaintiff’s claims, and that for this reason, my brother or I are likely to retaliate in some way against the Plaintiff. This argument is entirely groundless. For one thing, the Plaintiff in this case has lied to the Court about the facts, specifically about the fact that my brother is using the Plaintiff’s name/image in commercial advertising. That is 100% false.

26. In addition, I am informed that numerous courts have already determined that the publication of mugshots is protected speech under the First Amendment. I am also informed that the republication of existing online content, including mugshots and arrest records, is protected by the Communications Decency Act, 47 U.S.C. § 230.

27. For those reason, among many others, I do not agree with Plaintiff’s suggestion that my brother has “no plausible defense”. On the contrary, my brother and I both strongly believe that Plaintiff’s claims are entirely groundless, and that Plaintiff has no chance whatsoever of succeeding on the merits here.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

Executed on July 21, 2021.



Kyle Grant

EXHIBIT 4

David S. Gingras, #021097
Gingras Law Office, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85044
Tel.: (480) 264-1400
Fax: (480) 248-3196
David@GingrasLaw.com

Attorney for Defendants
Travis Paul Grant and Mariel Lizette Grant

SUPERIOR COURT OF ARIZONA
COUNTY OF MARICOPA

Jane Doe,
Plaintiff,
vs.
Travis Paul Grant, *et al.*,
Defendants.

Case No. CV2021-090059

**AFFIDAVIT OF MARIEL GRANT IN
SUPPORT OF DEFENDANTS'
MOTION TO DISMISS FOR LACK
OF PERSONAL JURISDICTION**

(Assigned to Hon. Tracy Westerhausen)

I, Mariel Grant, hereby state and declare as follows:

1. My name is Mariel Grant. I am a United States citizen, a resident of the State of Florida, am over the age of 18 years, and if called to testify in court or other proceeding I could and would give the following testimony which is based upon my own personal knowledge.

2. I am aware that I am currently a defendant in this matter. I have reviewed the Complaint filed in this case, and I have personal knowledge of the following facts.

3. I am married to Travis Paul Grant who I understand is a co-defendant in this matter. I was married to Travis during all times relevant to this matter.

4. My husband owns and operates several websites that I understand are the subject of this lawsuit including rapsheetz.com, bailbondshq.com, and publicpolicerecord.com ("Travis's Websites")

1 5. I have no role whatever in operating any of Travis's Websites. I have never
2 had any role in operating any of these websites since they were first created.

3 6. I am aware that my name appears listed as the "manager" of Gainesville
4 Console Doctor, LLC, and that this company is listed in the Terms of Service as the
5 owner/operator of one or more of Travis's Websites.

6 7. As far as I am aware, Gainesville Console Doctor, LLC is a company that
7 my husband formed in Florida many years ago when he was in the business of repairing
8 video game consoles such as Microsoft Xbox. While I understand my name may be listed
9 as the manager of that company, I am not actively involved in any of the company's
10 operations, whatever they may be, and as noted above, if Gainesville Console Doctor,
11 LLC has any role in operating any of Travis's Websites, that is not something I have any
12 involvement with.

13 8. I am currently 39 years old and I am a stay at home mother. My sole
14 occupation is taking care of my two small children.

15 9. I am a 2006 graduate of Florida State University where I majored in
16 Theatre.

17 10. From 1999 to 2001, I served in the United States Marine Corps. During my
18 time in the military, I was stationed at Camp Pendleton, California. I was honorably
19 discharged from the Marines on December 1, 2001.

20 11. I do not transact any business in Arizona, nor have I ever done so.

21 12. I do not own any property, real or personal, in Arizona, nor have I ever
22 done so.

23 13. I have no bank accounts or other assets in Arizona.

24 14. I have never been to Arizona, except possibly during a layover on a flight
25 to/from another destination.

26 15. Prior to the commencement of this lawsuit, I did not know the Plaintiff and
27 I had no idea that he/she was a resident of Arizona. Indeed, my only knowledge is that
28 Plaintiff claims to currently reside in Arizona. I have no idea if he/she was actually living

1 in Arizona at the time of her arrest. To the best of my knowledge, that information was
2 not released by MCSO when it published Plaintiff's mugshot and arrest information
3 online.

4
5 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the
6 United State of America that the foregoing is true and correct.

7
8 Executed on February 17, 2021.



Mariel Lizette Grant

EXHIBIT 5

GINGRAS LAW OFFICE, PLLC

4802 E. Ray Road #23-271, Phoenix, AZ 85044 • Tel: (480) 264-1400 • Fax: (480) 248-3196

January 22, 2021

VIA email only: aivchenkopllc@gmail.com

Andrew Ivchenko, Esq.
LAW OFFICES OF ANDREW IVCHENKO
4960 S. Gilbert Road, #1-226
Chandler, AZ 85249

Re: *Doe v. Grant*; MCSC Case No. CV2021-090059 (“Case #6”)

Andrew,

Travis has informed me that he and his wife, Mariel, were served with the Complaint and Summons in Case #6 on Monday, January 18th. Based on my review of the Complaint, I am writing to demand that you immediately dismiss all claims against Mariel Grant with prejudice. If you refuse to do so, I will seek Rule 11 sanctions against you for bringing claims against Mrs. Grant which have no factual or legal basis.

The issue is very simple—you have sued Mrs. Grant for various torts, but as far as I can tell, you have no factual or legal grounds for any of those claims as to Mrs. Grant. Rather, it appears the only reason you named Mrs. Grant as a party is because she is married to Travis Grant. As explained below, that is NOT a valid basis to include Mrs. Grant as a party given the specific facts of this case.

As you may know, Mariel previously submitted an affidavit in Case #4 (Doc. 5-2) in which she stated: “My husband owns and operates several websites that I understand are the subject of this lawsuit. I have no role whatever in operating any of these sites.” (emphasis added). A copy of this affidavit is enclosed for your reference.

Unless you have admissible evidence (or a good faith basis to believe, formed after a reasonable inquiry, that such evidence exists) proving that Mariel’s affidavit is false, that means Mariel is NOT a “mugshot website operator” as defined by A.R.S. § 44-7902(A). Because Mariel is not a mugshot website operator, A.R.S. § 44-7902(B) simply does not apply to her at all. For that reason, your first cause of action against Mariel (accusing her of violating the mugshot act) is utterly groundless and thus violates Rule 11.

By the same token, all of your other claims against Mrs. Grant are groundless for the simplest possible reason—because she did not engage in any of the wrongful conduct giving rise to your client’s claims; i.e., Mariel did NOT misappropriate your client’s name/likeness, she did NOT post any statements which placed your client in a false light, and she did not engage in any other unlawful conduct towards your client.

This begs the question: *why on Earth are you suing Mariel Grant?* What Rule 11 basis did you have for naming her as a defendant?

As far as I can tell, the only basis you had for suing Mariel is that she is married to Travis. In Arizona, when a defendant is married, both spouses are normally/routinely named as a matter of course. That much is not controversial.

The reason for naming both spouses in Arizona is simple: Arizona is a community property state. Because Arizona recognizes the legal fiction of a “marital community” (which may often hold the majority of property owned by a married defendant) if a plaintiff wants to recover from community assets, the plaintiff is required by law to name both spouses in order to “bind the community”. See A.R.S. § 25–215(D) (providing that in order to recover a community debt, “the spouses shall be sued jointly...”) (emphasis added). That is true even if one spouse had no role in any unlawful conduct; it is sufficient to name them solely to satisfy the requirements of A.R.S. § 25–215(D).

But A.R.S. § 25–215 does not apply here because the Travis and Mariel Grant do not live in Arizona. As you know, they live in Florida, and they have lived in Florida during all times relevant to this case. At no time have they lived in Arizona.

Why does this matter? It matters because unlike Arizona, Florida is not a community property state. Thus, in Florida, no “marital community” exists.

Because there is no Grant marital community, there is no basis to join Mariel Grant as a party under A.R.S. § 25–215(D). Instead, if you wish to pursue claims against Mrs. Grant, you must have an independent Rule 11 basis to believe that she has personally engaged in unlawful conduct. The mere fact that she is married to Travis Grant does not supply such a basis. The law on this point is crystal clear: “we hold that the wife is not personally liable for the torts of her husband.” *Ruth v. Rhodes*, 66 Ariz. 129, 138 (Ariz. 1947) (emphasis added) (citing extensive authority).

For that reason, if you do not promptly dismiss Mariel as defendant and if she is forced to appear in this case, then in addition to other relief, I will bring a motion seeking Rule 11 sanctions against you for the reasons stated above. Of course, if you have some legal and/or factual basis that would support naming Mrs. Grant as a party in Case #6, please provide an explanation of such facts/law.

If you have any questions please let me know.

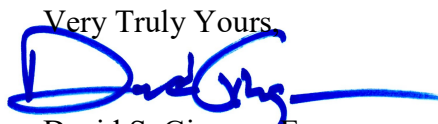
Very Truly Yours,

David S. Gingras, Esq.

EXHIBIT 6

20211046er

1
2 An act relating to arrest booking photographs;
3 amending s. 901.43, F.S.; prohibiting the republishing
4 or redissemination of certain arrest booking
5 photographs; authorizing a person whose arrest booking
6 photograph is republished or redisseminated to bring a
7 civil action against the person or entity republishing
8 or redisseminating the photograph if such person or
9 entity was required to remove it from the publication
10 or electronic medium; authorizing a court to impose a
11 specified civil penalty; requiring a court to award
12 reasonable attorney fees and court costs; requiring
13 that recovered civil penalties be deposited into the
14 General Revenue Fund; providing that republishing or
15 redisseminating an arrest booking photograph under
16 certain circumstances constitutes an unfair or
17 deceptive trade practice; making technical changes;
18 expanding the applicability of provisions relating to
19 the dissemination of arrest booking photographs to
20 include a person or an entity whose primary business
21 model is the publishing or disseminating of such
22 photographs for a commercial purpose or pecuniary
23 gain; providing an effective date.

24
25 Be It Enacted by the Legislature of the State of Florida:

26
27 Section 1. Section 901.43, Florida Statutes, is amended to
28 read:

29 901.43 Dissemination of arrest booking photographs.—

20211046er

(1) Any person or entity engaged in the business of publishing through a publicly accessible print or electronic medium or otherwise disseminating arrest booking photographs of persons who have previously been arrested may not solicit or accept a fee or other form of payment to remove the photographs.

(2) A person whose arrest booking photograph is published or otherwise disseminated, or his or her legal representative, may make a request, in writing, for the removal of an arrest booking photograph to the registered agent of the person or entity who published or otherwise disseminated the photograph. The written request for removal of the arrest booking photograph must be sent by registered mail and include sufficient proof of identification of the person whose arrest booking photograph was published or otherwise disseminated and specific information identifying the arrest booking photograph that the written request is seeking to remove. Within 10 calendar days after ~~of~~ receipt of the written request for removal of the arrest booking photograph, the person or entity who published or otherwise disseminated the photograph shall remove the arrest booking photograph without charge and may not republish or otherwise redisseminate such photograph.

(3) (a) The person whose arrest booking photograph was published or otherwise disseminated in the publication or electronic medium may bring a civil action to enjoin the continued publication or dissemination of the photograph if the photograph is not removed within 10 calendar days after receipt of the written request for removal. The court may impose a civil penalty of \$1,000 per day for noncompliance with an injunction and shall award reasonable attorney fees and court costs related

20211046er

59 to the issuance and enforcement of the injunction. Moneys
60 recovered for civil penalties under this paragraph ~~section~~ shall
61 be deposited into the General Revenue Fund.

62 (b) If a person or an entity was required to remove an
63 arrest booking photograph under this section and later
64 republishes or otherwise redisseminates the photograph in the
65 publication or electronic medium, the person whose photograph is
66 republished or redisseminated may bring a civil action to enjoin
67 the continued publication or dissemination of the photograph.
68 The court may impose a civil penalty of \$5,000 per day for
69 noncompliance with an injunction and shall award reasonable
70 attorney fees and court costs related to the issuance and
71 enforcement of the injunction. Moneys recovered for civil
72 penalties under this paragraph shall be deposited into the
73 General Revenue Fund.

74 (4) Refusal to remove an arrest booking photograph after
75 written request has been made or republishing or otherwise
76 redisseminating an arrest booking photograph after a written
77 request to remove such photograph has been made constitutes an
78 unfair or deceptive trade practice in accordance with part II of
79 chapter 501.

80 (5) This section does not apply to any person or entity
81 that publishes or disseminates information relating to arrest
82 booking photographs unless:

83 (a) The person or entity solicits or accepts payment to
84 remove the photographs; or

85 (b) The person or entity's primary business model is the
86 publishing and disseminating of arrest booking photographs for a
87 commercial purpose or pecuniary gain.

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88

Section 2. This act shall take effect October 1, 2021.

EXHIBIT 7

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RAPSHEETS, CORP.

Company Number

155707486

Native Company Number

[155707486](#)

Status

Vigente

Incorporation Date

10 June 2021 (2 months ago)

Company Type

SOCIEDAD ANONIMA

Jurisdiction

[Panama](#)

Registered Address

- DISTRITO PANAMÁ, PROVINCIA PANAMÁ
- Panama

Agent Name

ARCIA CARRILLO PUJOL ABOGADOS

[Directors / Officers](#)

- [AADELAIDA JIMENEZ JIMENEZ](#), suscriptor
- [ARCIA CARRILLO PUJOL ABOGADOS](#), agent
- [KYLE DAVID GRANT](#), director
- [KYLE DAVID GRANT](#), presidente
- [LA REPRESENTACIÓN LEGAL SERÁ EJERCIDA DE MANERA POR EL PRESIDENTE, LAS FALTAS TEMORALES DE ESTE TENDRÁ LA REPRESENTACIÓN DE LA SOCIEDAD EL SECRETARIO Y EN AUSENCIA DE ESTE ÚLTIMO EL TESORERO, O BIEN QUIEN INDIQUEN LOS ESTATUTOS Y LAS RESOLUCIONES VÁLIDAMENTE ADOPTADAS POR LA JUNTA DIRECTIVA](#), representante
- [MARIEL LIZETTE GRANT](#), director
- [MARIEL LIZETTE GRANT](#), secretario
- [SONIA ANDREA CARDONA COLORADO](#), suscriptor
- [TRAVIS PAUL GRANT](#), director
- [TRAVIS PAUL GRANT](#), tesorero

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- inactive branch [RAPSHEETS ACQUISITION CORPORATION](#) (Tennessee (US), 6 Jul 2004- 21 Sep 2007)
- inactive branch [RAPSHEETS ACQUISITION CORPORATION](#) (Arizona (US), 5 Aug 2004-)

* While we strive to keep this information correct and up-to-date, it is not the primary source, and the company registry ([see source](#), above) should always be referred to for definitive information

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