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**ARIZONA SUPERIOR COURT**

**MARICOPA COUNTY**

JOHN DOE,

Plaintiff,

vs.

TRAVIS PAUL GRANT and MARIEL  
LIZETTE GRANT, husband and wife; KYLE  
DAVID GRANT and JANE DOE GRANT,  
husband and wife, and XYZ Corporations,

Defendants.

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

**VERIFIED COMPLAINT  
(Tier Two)**

Jury Trial Demanded

Plaintiff alleges:

1. Plaintiff resides in Maricopa County, Arizona.
2. Defendants are mugshot website operators who reside in, and operate businesses in, Florida. Defendants own and operate mugshot websites including [www.rapsheets.org](http://www.rapsheets.org), [www.rapsheetz.com](http://www.rapsheetz.com), [www.bailbondsearch.com](http://www.bailbondsearch.com), [www.bailbondshq.com](http://www.bailbondshq.com), and [www.publicpolice record.com](http://www.publicpolice record.com) (the "Websites") as defined by A.R.S. § 44-790(4). Pursuant to A.R.S. § 44-7902(A), Defendants transact business in Arizona.
3. Venue and jurisdiction are proper in this Court.

1           4.     Based on the characteristics of this action, this case should be assigned  
2 Tier 2 pursuant to Rule 26.2(b)(2).

3           5.     Plaintiff seeks no monetary damages in this action and only seeks to have  
4 an Order issued by the Court requiring permenate removal of his criminal justice  
5 information from Defednants websites.

6           6.     The Maricopa County Sheriff's Office (the "Sheriff's Office") arrested  
7 Plaintiff for suspicion of violating Arizona law.

8           7.     Following the arrest, the Sheriff's Office photographed Plaintiff. The  
9 Sheriff's Office made the photograph (the "Mugshot") publicly available on a  
10 government website.

11          8.     Defendant's Websites are privately-owned, publicly-available websites  
12 that post mugshots and other criminal justice information about various people without  
13 their consent, who have been arrested. The Websites generate income and Defendants  
14 utilize the Websites for commercial purposes and pecuniary gain.

15          9.     Since at least November 5, 2019, Defendants, without Plaintiff's  
16 permission, consent or authorization, published Plaintiff's criminal justice records (the  
17 "Records") and Mugshot on the Websites.

18          10.    Despite Plaintiff's multiple demands that Defendants remove this  
19 information, Defendants refuse to do so.

20          11.    The public nature of the Websites and public availability of Plaintiff's  
21 Mugshot and Records has and continues to cause harm to Plaintiff, including unwanted  
22 publicity and ramifications for Plaintiff's employment.

23                   **COUNT ONE**

24                   **(Violation of A.R.S. §§ 44-7901-7902)**

25          12.    Defendants published Plaintiff's Mugshot and Records on a publicly  
26 available internet website in violation of A.R.S. §§ 44-7901-7902.

1           13. As a result, Plaintiff suffered irreparable harm and seeks to have the Court  
2 issue an Order to remove his criminal justice information from Defendant's websites.

3           14. Plaintiff seeks no monetary damages, but only injunctive relief.

4                                   **COUNT TWO**

5                                   **(Misappropriation of Name and Likeness)**

6           15. Defendants appropriated Plaintiff's name and likeness for pecuniary gain  
7 to increase revenue for its Websites.

8           16. Plaintiff is easily identified from the publication of the Mugshot and  
9 Records on the Websites.

10          17. Defendants benefited from the publication because the publication of  
11 mugshots and criminal records for pecuniary gain is the Websites' very purpose.

12          18. As a result, Plaintiff suffered irreparable harm and seeks to have the Court  
13 issue an Order to remove his criminal justice information from Defendant's websites.

14          19. Plaintiff seeks no monetary damages, but only injunctive relief.

15                                   **COUNT THREE**

16                                   **(False Light)**

17          20. Defendants gave publicity to a matter in an easily accessible public forum  
18 concerning Plaintiff that places Plaintiff in a false light. Specifically, by posting the  
19 Mugshot and Records, Defendants' websites imply that Plaintiff did something wrong  
and is guilty of a crime.

20          21. Plaintiff did not consent, authorize, or agree that Defendants could post  
21 this information about her.

22          22. The false light in which Plaintiff was placed would be highly offensive to  
23 a reasonable person.

24          23. Defendants know or recklessly disregarded the false light in which  
25 Plaintiff is placed due to the publication of the Mugshot and Records on the Websites.

