

7 **IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA**

8
9 **IN AND FOR THE COUNTY OF MARICOPA**

10 Father John Doe on behalf himself
11 and as legal guardian of Minor Jane
12 Doe,

13 Plaintiffs,

14 vs.

15 Jeannette Garcia; Angela Rodin; City
16 of Avondale; Russ Skinner; Turning
17 Point Action, Inc., an Indiana
18 corporation; and Turning Point USA,
19 Inc., an Indiana corporation;
20 Unknown Defendants,
21 Defendants.

Case No. CV2025-062070

COMPLAINT

JURY DEMAND

TIER 3

22 Plaintiffs Father John Doe and Minor Jane Doe hereby allege the following
23 in support of their Complaint against Jeannette Garcia; Angela Rodin; City of
24 Avondale; Maricopa County Sheriff Russ Skinner; Turning Point Action, Inc., an
25 Indiana corporation; Turning Point USA, Inc., an Indiana corporation; and
Unknown Defendants.

FACTUAL BACKGROUND

22. Garcia was appointed to the Avondale City Council in October 2024.

23. In addition to her position as a Council Member during the relevant time-frame, Garcia was also working or performing services for, or on behalf of, TP Defendants.

24. Garcia's duties and responsibilities as an employee of TP Defendants were supervisory and/or managerial in nature.

25. Father Doe was employee TP Defendants hired to promote TP's interests and preferred candidates in the November 2024 state and federal elections. He was assigned to Garcia's team and had been reporting to Garcia since September 2024.

26. During that time, through her work relationship with Father Doe, Garcia became familiar with Minor Doe.

27. On November 14, 2024, Garcia and several co-workers who also worked for or performed services on behalf of TP Defendants, including Father Doe, gathered at a restaurant in Goodyear, AZ to celebrate the outcome of state and federal elections on November 7, 2024.

28. As the night progressed, Garcia began making remarks inviting and suggesting her interest in having sex or being intimate with Father Doe, which he repeatedly rebuffed. At one point in the evening Garcia propositioned Father Doe, offering him employment with TP Defendants if he agreed to have sex with her. As Garcia became more aggressive and explicit, presumably due to excessive consumption of alcohol, Father Doe eventually decided he could no longer tolerate Garcia's harassment and inappropriate conduct and decided to leave the restaurant

2 29. When Father Doe arrived at home, at or around 1:15/1:30 a.m., he
3 discovered that his daughter Minor Doe was not home. Because his daughter had
4 been with a friend earlier that evening, Father Doe drove to the friend's home and
5 was told by the friend's parents that they had dropped Minor Doe off at home
6 earlier.

7 30. When Father Doe returned home for the second time, at or around
8 2:00 a.m., he was met there by uniformed MCSO Deputies, who advised him that
9 his daughter Minor Doe was not home, that she was "safe", and that she was with
10 Garcia. Father Doe was shocked.

11 31. He explained to the MCSO Deputies that he had just left a function
12 with Garcia and openly and repeatedly questioned how or why his daughter would
13 be with Garcia. His panic and shock was compounded by the fact he was aware
14 Garcia and other individuals she was with had consumed excessive amounts of
15 alcohol and were extremely intoxicated when he (Father Doe) left the restaurant.

16 32. With MCSO Deputies still present, Father Doe made multiple
17 unsuccessful attempts to call his daughter, Minor Doe and Garcia.

18 33. Garcia eventually answered Father Doe's calls around 2:20 a.m. and
19 confirmed that Minor Doe was with her.

20 34. While Father Doe was understandably upset with his daughter's naive
21 decision to let herself be manipulated into going with Garcia (and two other
22 unknown adults, including Defendant Rodin and another unknown male employee
23 of TP Defendants), Father Doe was understandably shocked with Garcia's
24 inexplicable decision to take his daughter from her home without his permission
25 or consent, place her in a vehicle while she (Garcia) was extremely intoxicated,
26 along with two other unknown adults who were also likely intoxicated.

1 43. Minor Doe remained with Garcia, in her home, until the following
2 day.

3 44. Garcia's inexplicable and egregious misconduct, which was
4 facilitated in part by and through her position, influence and authority as a sitting
5 Avondale City Council Member, her position and influence as an employee of TP
6 Defendants, and the complicit conduct of MCSO Deputies, have caused Father Doe
7 and Minor Doe significant trauma and harm that will require ongoing mental health
8 counseling and therapy.

9 45. The Incident had an immediate impact on Minor Doe and her
10 behavior, attitude, and mental health. She became depressed and recluse. For
11 months after the Incident, she was terrified of leaving home and rarely left her
12 room; she no longer wanted to interact socially with friends and family or
13 participate in extracurricular activities; she no longer wanted to go to school; her
14 grades began to suffer. Minor Doe has attended regular mental health counseling
15 since the Incident.

16 **FIRST CAUSE OF ACTION**

17 **False Imprisonment/Kidnapping**

18 **Minor Doe against Garcia, Rodin, and Unknown Male Employee**

19 46. Plaintiffs incorporate by reference the preceding paragraphs of this
20 Complaint as if specifically set forth herein.

21 47. By manipulating Minor Doe and taking her from her home in the
22 middle of the night under false pretense, driving Minor Doe to her (Garcia's) home
23 with two other unknown adults while intoxicated, and keeping Minor Doe in her
24 (Garcia's) home for roughly 12 hours, without prior notice or consent of her father
25 and sole guardian CC, Defendants falsely imprisoned Minor Doe.

26 48. As a direct and proximate result of Defendants' acts and omissions,
27 Plaintiff has suffered damages, including but not limited to, past and future medical
28 expenses. In addition, she has and will continue to suffer physical impairment,