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Attorneys for Plaintiffs

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

**AMANDA WRAY; KIMBERLY
STAFFORD; and EDMOND RICHARD,**

Plaintiffs,

v.

**JANN-MICHAEL GREENBURG, in his
individual capacity; MARK ALAN
GREENBURG; DAGMAR GREENBURG;
SCOTTSDALE UNIFIED SCHOOL
DISTRICT NO. 48; and DOES 1-20,**

Defendants.

Case No.: CV 2022-005680

COMPLAINT

- (1) Violations of 42 U.S.C. § 1983
(First Amendment Retaliation)
- (2) Violations of 42 U.S.C. § 1983
(Deprivation of First Amendment Rights)
- (3) Intentional Infliction of Emotional Distress
- (4) Negligent Infliction of Emotional Distress
- (5) Defamation
- (6) False Light Invasion of Privacy

(Jury Trial Requested)

COPY

MAY 05 2022



CLERK OF THE SUPERIOR COURT
F. FOWLER
DEPUTY CLERK

1 Plaintiffs Amanda Wray, Kimberly Stafford, and Edmond Richard, by and through their
2 attorneys, Wilenchik & Bartness P.C. and Dhillon Law Group Inc., for a Complaint against
3 Defendants Jann-Michael Greenburg, Mark Alan Greenburg, Dagmar Greenburg, the Scottsdale
4 Unified School District No. 48, and Does 1-20, allege and aver as follows:

5 **INTRODUCTION**

6 1. Plaintiffs Amanda Wray, Kimberly Stafford (“Kim Stafford”), and Edmond Richard
7 (together “Plaintiffs”) are loving, involved parents and community members in the Scottsdale
8 Unified School District (“SUSD” or “District”). When they began to see issues of concern at local
9 schools, they engaged to try to remedy perceived problems. They formed associations with like-
10 minded parents, publicly advocated for children, and petitioned the SUSD Board for changes they
11 believed would help address the systemic issues. For the offense of standing up for children and
12 engaging in the political process, they were maliciously targeted by Defendants Jann-Michael
13 Greenburg, Mark Alan Greenburg, the Scottsdale Unified School District No. 48, and Does 1-20
14 (collectively “Defendants”).

15 2. The goal of Defendants’ conspiracy was clear: to silence and punish dissenting
16 voices and frighten away other potential speakers who might dare express an opposing point of
17 view. Defendants used both legal and illegal methods to accomplish their unconstitutional goal.
18 They amassed reams of public and private information about the Plaintiffs, including information
19 related to Plaintiffs’ jobs, businesses, finances, medical history, family history, housing situation,
20 and children. They videotaped, photographed, and recorded the Plaintiffs and their children. They
21 used fake names and accounts to stalk Plaintiffs’ social media activities and publicly berate them
22 using false and grossly contorted information from their expansive dossier. And they misused
23 District resources and what should have been private, protected parent communications to the
24 District to retaliate against Plaintiffs for their protected speech.

25 3. The U.S. Constitution has long protected the right of parents to “direct the
26 upbringing and education of children.” *Pierce v. Society of the Sisters of the Holy Names of Jesus*
27 *and Mary*, 268 U.S. 510, 534 (1925). “The history and culture of Western civilization reflect a
28 strong tradition of parental concern for the nurture and upbringing of their children. This primary

1 role of the parents in the upbringing of their children is now established beyond debate as an
2 enduring American tradition.” *Wisconsin v. Yoder*, 406 U.S. 205, 232 (1972).

3 4. The rights of free speech and government petition are equally settled in
4 Constitutional law. “The First Amendment protects the right of an individual to speak freely, to
5 advocate ideas, to associate with others, and to petition his government for redress of grievances.
6 And it protects the right of associations to engage in advocacy on behalf of their members.” *Smith*
7 *v. Arkansas State Highway Emp., Local 1315*, 441 U.S. 463, 464 (1979).

8 5. Defendants violated both these sacred constitutional rights, as well as other laws,
9 through their conspiracy to silence Plaintiffs and retaliate against them for their speech.

10 **PARTIES JURISDICTION AND VENUE**

11 6. Plaintiff Amanda Wray is, and at all times relevant herein was, a resident of
12 Fountain Hills, Arizona. Ms. Wray has two children who attend SUSD schools.

13 7. Plaintiff Kimberly Stafford is, and at all times relevant herein was, a resident of
14 Scottsdale, Arizona. Ms. Stafford has one child who previously attended an SUSD school.

15 8. Plaintiff Edmond Richard is, and at all times relevant herein was, a resident of
16 Scottsdale, Arizona. Mr. Richard has six children who previously attended SUSD schools.

17 9. Upon information and belief, Defendant Jann-Michael Greenburg is, and at all times
18 relevant herein was, a resident of Scottsdale, Arizona. Jann-Michael Greenburg has been a
19 member of the SUSD Board since 2018, and is being sued in his individual capacity. Jann-Michael
20 Greenburg was the president of the SUSD Board from January 2021 until approximately
21 November 2021.

22 10. Upon information and belief, Defendant Mark Alan Greenburg is, and at all times
23 relevant herein was, a resident of Scottsdale, Arizona. Mark Greenburg is Jann-Michael
24 Greenburg’s father.

25 11. Upon information and belief, Defendant Dagmar Greenburg is, and at all times
26 relevant herein was, a resident of Scottsdale, Arizona. Dagmar Greenburg is Mark Greenburg’s
27 spouse.
28

12. Defendant Scottsdale Unified School District No. 48 is a duly organized school district and a local governmental entity.

13. Does 1-20 are individuals, entities, associations, and/or governmental units whose conduct gave rise to Plaintiffs' claims in this Complaint, but whose identities are unknown to Plaintiffs, despite Plaintiffs' diligence to identify them.

14. The events and omissions giving rise to this action occurred in Maricopa County, Arizona.

15. This Court has jurisdiction over the subject matter and the parties to this action pursuant to A.R.S. § 12-123 and Arizona Constitution Article 6 § 14.

16. Venue is proper in Maricopa County, Arizona pursuant to A.R.S. § 12-401.

FACTUAL BACKGROUND

17. In or around August 2020, Plaintiffs, along with many other SUSD parents and stakeholders, formed a private Facebook group Scottsdale Unified – CAN (Community Advocacy Network) ("Facebook Group"), and Amanda Wray took a leadership position as a group administrator.¹ Kim Stafford had also been an administrator of the Facebook Group, though she left the Facebook Group in March 2021 after the goal of in-person learning had finally been realized. At its zenith, the group had more than seventeen hundred members.

18. The Facebook Group initially began as a way for concerned parents to discuss issues related to SUSD's COVID-19 policies, but later expanded its focus to include general matters of concern such as curriculum, school budgetary priorities, and student safety.

19. Plaintiffs were three vocal individuals in the District. They engaged with District officials and the SUSD Board President Jann-Michael Greenburg over matters of public concern. Because Plaintiffs dared to express opinions contrary to the District's chosen course of action, the

¹ The group has had a variety of names including SUSD K-12 Community Forum (August 27–29, 2020), SUSD K-12 Community Forum for FULL Re-Open (August 29, 2020–March 5, 2021), SUSD – CAN (Community Advocacy Network) (March 5, 2021–August 3, 2021 and September 1, 2021 and thereafter), and Scottsdale Unified – CAN (Community Advocacy Network) (August 3–September 1, 2021).

Greenburgs targeted them as well as other parents, in a campaign of harassment, retaliation, intimidation, and digital surveillance designed to get them to stop criticizing the SUSD online.

The Conspiracy to Silence and Punish Plaintiffs for Their Speech

20. Defendants began to collect information about individuals they viewed as their political enemies, including Plaintiffs. Defendants used this information to attack Plaintiffs publicly and privately, with the intent to silence their speech. On information and belief, for over a year, Defendants gathered Plaintiffs' public and private data, internally shared information (including private communications solely possessed by the District), and used this data to attack Plaintiffs for their speech.

21. Defendants' primary repository for this cache of information about their political opponents was a public Google drive, which one of the Defendants revealed to a Plaintiff in Fall 2021. The drive included addresses, a full social security number, background checks, divorce records, photographs, videos, recordings, internal unredacted communications parents had with the District, and much, much more ("Google Drive" or "Dossier"). This drive reached the size of approximately 100 gigabytes of data.

Mark Greenburg

22. On information and belief, Mark Greenburg was primarily responsible for gathering, storing, and strategically disseminating Plaintiffs' Dossier information on behalf of the conspiracy, as well as effectuating the goals of retaliating against Plaintiffs and others for their speech. Greenburg is well known in the community for dirty political tactics and has a long history of "settling scores" against personal enemies through malicious litigation, defamatory impersonation, and harassment.

23. Mark Greenburg literally wished death on those who criticized SUSD and Jann-Michael Greenburg. On July 7, 2021, Mark Greenburg recorded a video of a discussion on the SUSD-CAN Facebook page where he, among other things, stated out loud after coming across a comment by Edmond Richard criticizing SUSD policies, "I really want Edmond to die. I'll be so happy. I'll have a fucking party."

24. Upon information and belief, Mark Greenburg videotaped, obtained photographs (including of Plaintiffs' minor children), and recorded Plaintiffs as well as other local parents and children. Among the data found on the Google drive was:

- a. A September 1, 2020, video of a group of parents including Amanda Wray, which was also uploaded to YouTube by an account named "Guy Grifter Phillips," which, upon information and belief, is an account maintained by Mark Greenburg.
- b. A September 7, 2020, TikTok video of Amanda Wray discussing a medical condition, along with numerous other TikTok videos she had made.
- c. Numerous photographs of Amanda Wray, her family, and her home.
- d. Multiple videos about Plaintiff Edmond Richard, spliced and misleadingly edited the videos and then posting on YouTube with titles such as, "Edmond Richard, Scottsdale Racist on CNN."
- e. Multiple photographs of Kim Stafford and a photo solely of her minor daughter with the file name "KIM STAFFORD_S KID."
- f. A May 26, 2021, photograph of parents and children supporting in-person learning.

25. Upon information and belief, Mark Greenburg also collected various other sensitive and personal data about Plaintiffs and other parents. The Google Drive included:

- a. Amanda Wray's employment history.
- b. Amanda Wray's mortgage records.
- c. Kim Stafford's high school information, birthday, child's name and age, and state of residence.
- d. Fifteen background checks on the Plaintiffs and other parents, including a 162-page "comprehensive report" on one individual including their entire social security number.
- e. Bankruptcy filings, traffic court records, criminal records, business registrations, professional licensing information, mortgage documents,

addresses, children's ages and names, family trees with extended family names and relationships, information about individuals' race and ethnicity, employment history, and the credit history of Plaintiffs and others.

26. Mark Greenburg went so far as to find a bankruptcy record for an individual sharing Amanda Wray's maiden name and home state, which circumstances would have shown was not Ms. Wray. Nevertheless, upon information and belief, Mark Greenburg saved this information with his other files about Amanda Wray to provide the false impression to all who accessed the Google Drive that Amanda Wray, a financial planner, had previously filed for bankruptcy.

27. Mark Greenburg's monitoring of Plaintiffs' social media activities was relentless. For example, between August 20 and 21, 2021, Mark Greenburg created at least fifty-seven screenshots of Amanda Wray's social media activity, all of which he saved to the Google Drive.

28. Mark Greenburg's efforts to investigate Plaintiffs' activities often immediately followed their criticism of Jann-Michael Greenburg or SUSD.

29. Mark Greenburg kept SUSD officials apprised of his conduct. For example, on September 12, 2020, Mark Greenburg took a screenshot of an argument he was having on a Facebook comment thread with Kathleen Angelos, who was running for an open seat on the SUSD Governing Board at the time, in which he accused her of racism. In that same screenshot, Mark Greenburg can be seen speaking on Facebook Messenger with Zach Lindsay, then a candidate for the SUSD Board, who later had access to the Google Drive as a member of the SUSD Board. Mark Greenburg wrote, "I'm baiting her[.] She's so fucking stupid."

30. Mark Greenburg also regularly impersonated others on social media to gain access to private groups or to attack others anonymously. Plaintiffs know of at least six fake profiles, upon information and belief, Greenburg created either to infiltrate the Facebook Group or anonymously attack others. Greenburg, upon gaining access to the Group, would save lists of group members and their conversations to be used later to harass group members. He would also use anonymous profiles to "bait" and berate others.

a. On October 7, 2020, he impersonated an African American male and military veteran under the name of Frank Graham to gain access to the Facebook

Group, after which he saved an 89-page document of all group member names;

- b. On October 10, 2020, he gained access to the Facebook Group through use of the pseudonym “Ali,” and again created PDFs of the group’s activities and its members;
- c. On November 6, 2020, he somehow gained access to the Facebook Group again as he posted private conversation from the Facebook Group page to his personal Facebook page. Plaintiffs reasonably believe Greenburg accessed the group through another fake account;
- d. On May 25, 2021, and then again on June 4, 2021, Mark Greenburg logged into the Facebook Group, this time by way of an account with an adult female’s profile picture, to monitor and save conversations in the Facebook Group, which he then saved to the Google Drive; and
- e. On September 12, 2020, through the fake account “Guy Phillips Re-Election Page,” he personally attacked Plaintiff Edmond Richard for his personal appearance and disability, and incorporated other pejoratives.



Author

Guy Phillips Re-Election Page

Hi Edmond. I agree with you completely. It is people like you, who have literally eaten themselves into a disability, who literally cannot control their food intake to save their own lives, who are best positioned to give advice to the community about how everyone else should lead their lives. Your defense of racists is so stirring, it warms my heart. People like you who take from the community, who contribute nothing, always have the most insight into what is best for all of us. Thank you for all of your gifted comments. You are an intellectual giant. Again, I thank you.

Like · Reply · 6m

Jann-Michael Greenburg and the District

31. Whereas Mark Greenburg was using dubious public means to gather information, Jann-Michael and the District were curating and collecting Plaintiffs’ and other parents’ personal

1 information and communications and supplying it to be stored in the Google Drive to be unleashed
2 against Plaintiffs at an opportune time. Defendants had a pattern and practice of using SUSD
3 funds, access, and resources to contribute Plaintiffs' private information to the
4 Google Drive's cache of data.

5 32. The Google Drive contained private communications and information solely in the
6 possession of the District. These documents include:

- 7 a. Unredacted copies of emails exchanged between Amanda Wray and
8 Superintendent Scott Menzel which could only have been obtained from District
9 staff or agents and from the District's email system;
- 10 b. Unredacted copies of emails Kim Stafford sent to the district which could only
11 have been obtained from District staff or agents and from the District's email
12 system; and
- 13 c. An unredacted email of a parent named Jake Davis raising concerns about Jann-
14 Michael Greenburg's conduct as a board member and Mark Greenburg's actions
15 of taking pictures of students and parents before a board meeting, which could
16 have only been obtained from District staff or agents and from the District's
17 email system.

18 33. The Google Drive also included a video conversation of Jann-Michael and Mark
19 Greenburg discussing the contents of the private email from Amanda Wray to the District wherein
20 she told the Superintendent Mark Greenburg had taken actions to harass and intimidate her at a
21 prior SUSD Board meeting.

22 34. The District repeatedly shared Plaintiffs' private information with the knowledge
23 that these private communications would be used to retaliate against Plaintiffs and silence their
24 protected speech with which the District disagreed.

25 35. Mark Greenburg routinely made public records requests about Plaintiffs and other
26 parents within hours of these individuals sending private emails to the school about Mark
27 Greenburg's concerning behavior. Upon information and belief, this pattern shows that sources
28

1 inside the District immediately informed Mark Greenburg if a complaint was made about him, so
2 that he could seek related records through “official” channels.

3 36. The District had been made aware of concerns regarding Mark Greenburg’s
4 behavior on multiple occasions. Amanda Wray specifically asked Superintendent Menzel for
5 more protection at board meetings because of Greenburg’s threatening and intimidating actions.
6 Instead of working to make sure parents felt safe to attend public board meetings, these private
7 email concerns sent to the Superintendent somehow made their way, unredacted, into Defendants’
8 Google Drive.

9 **Defendants Retaliate and Work Together**
10 **to Silence Plaintiffs’ Speech and Intimidate Others to Stay Silent**

11 37. The District created and selectively enforced policies against Plaintiffs and their
12 parent allies when it served to further the ends of the conspiracy. On the May 18, 2021, public
13 Board meeting, a number of attendees did not wear masks. Masks were not required under Arizona
14 law, but were required on SUSD property per District policy. The District attempted to selectively
15 enforce the mask mandate, and then shut down the meeting when the minority of attendees would
16 not comply. A small number of parents (not the Plaintiffs) were disruptive at the meeting, but
17 most attendees were seated and quiet as they prepared for the meeting to begin. Further, most
18 attendees were wearing masks. Superintendent Menzel painted a very different picture after the
19 fact. In a written update to the Board, he described the meeting as having “felt like a January 6th
20 moment” and attendees as “agitated and non-compliant.” He further specifically singled out the
21 Facebook Group as being the source of some “rumbling.”

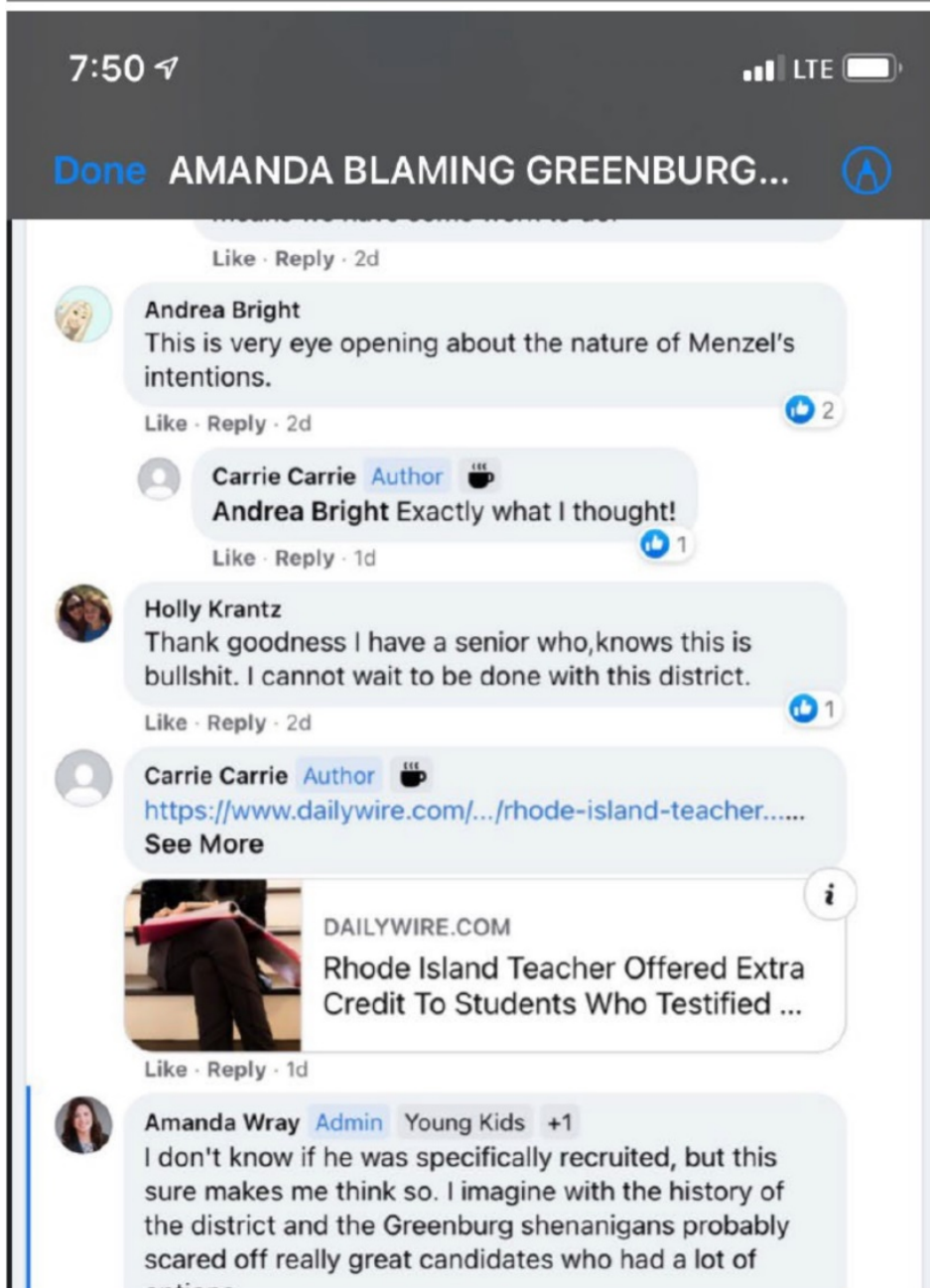
22 38. The following week, Superintendent Menzel provided the SUSD Board with a
23 subsequent written update after a meeting with some members of the Facebook Group. He
24 admitted to those present that, while he was not a member of the group, he had been monitoring
25 the Facebook Group’s speech. On information and belief, he had been monitoring the Facebook
26 Group by way of information gathered and provided to the District by Mark Greenburg from the
27 Dossier.
28

1 • Met with the CAN group (participants included [REDACTED]
2 [REDACTED], and perhaps one more that I am forgetting now). The meeting
3 started with Q&A rather than a statement by me since I wanted to reserve my comments until the
4 end. I shared a brief update previously so won't repeat that here. At the end I noted my
5 disappointment related to their participation in what happened on May 18th, especially since the
6 mask issue was the pretense for the disruption even though they all knew what had been
7 announced publicly on May 14th. I also pointed out during our conversation just how toxic social
8 media has become and that I had seen posts (including by some of them) that contributed to the
9 divisiveness. When asked about how to tone down the rhetoric, I specifically suggested they not
10 continue to give the microphone to people who have a political agenda and not one that is
11 focused on our students. Subsequent monitoring of their facebook page reflects a change in some
12 of the posts in a more positive direction...I hope that will continue.

9 39. Further proof of conspirators' information-sharing regarding Plaintiffs is
10 demonstrated by a response to a November 4 public records request made by Amanda Wray.
11 SUSD's public information officer William Berry produced a record showing that Superintendent
12 Menzel had emailed himself a screenshot, the file name of which began with "AMANDA
13 BLAMING GREENBURG..." depicting comments that Ms. Wray and another person made on
14 Facebook. The Google Drive contained a PDF entitled, "AMANDA BLAMING GREENBURG
15 SHENANIGANS ON INABILITY OF DISTRICT TO HIRE SUPER," and included the very
16 same screenshot Superintendent Menzel included in his email.

17 [Remainder of this page intentionally left blank.]
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From: Scott Menzel
To: Scott Menzel
Subject: Screenshot
Date: Thursday, June 24, 2021 8:16:22 PM



40. Finally, the District directly prevented the public from attending and making their concerns known at the August 24, 2021, board meeting, citing sensationalized accounts of the May 2021 board meeting as the basis for their decision to prevent public access and speech.

41. Yet at the very same time Superintendent Menzel was chastising members of the Facebook Group for “toxic social media” and requesting they “tone down the rhetoric,” co-

1 conspirator Jann-Michael Greenburg was on social media repeatedly comparing Facebook Group
2 members to Nazis, stating “[t]he comparison is apropos” and claiming that they had “made anti-
3 Semitic, racist, and xenophobic comments.”

4 42. Superintendent Menzel provided another telling update to the Board in early June
5 2021, demonstrating the “us versus them” mentality he and the District had with members of the
6 Facebook Group. After having a meeting discussing critical race theory with Dr. Stuart Rhoden,
7 a member of the District’s Equity and Inclusion Committee who had been highly and publicly
8 dismissive of Facebook Group parents’ concerns about Critical Race Theory, Superintendent
9 Menzel stated the following: “[Dr. Rhoden’s] views aligns [sic] *with ours* related to the distinction
10 that has been lost on those who are coming out against critical race theory.” (emphasis added)
11 Superintendent Menzel’s missive went on to relay that he met with two parents, one of whom
12 “posts somewhat regularly on the [Facebook Group],” and to say that her views were “inaccurate.”

13 43. Another example of the District’s selective policy enforcement targeting the
14 Facebook Group’s speech came by way of a letter from the District’s legal counsel. The District
15 trademarked the initials “SUSD” in October 2020. Jennifer McDowell, a community member
16 whom Mark Greenburg granted access to the Google Drive, and who, on information and belief,
17 contributed files to the Google Drive, created a Facebook group called “SUSD Teacher Support
18 Group” until June 15, 2021, when the group changed its name to the “Scottsdale Schools Teacher
19 Support.” Upon information and belief, the “SUSD Teacher Support Group” did not receive a
20 letter from SUSD or its counsel demanding that it cease and desist its use of the word “SUSD” in
21 its name.

22 44. This stands in stark contrast to the District’s actions against the Facebook Group, to
23 whom the District sent a cease and desist letter demanding that it stop using the word “SUSD” in
24 its materials. The District’s outside counsel, Jennifer N. MacLennan, informed the Facebook
25 Group that “the District has directed us to obtain your written acknowledgement that you have
26 ceased your use of ‘SUSD’ in the advertisement of your network, on social media and in all other
27 materials immediately.”
28

**GUST
ROSENFELD**
100 YEARS · 1921-2021

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July 28, 2021

**Via Federal Express &
Email susdcn@gmail.com**

Community Advocacy Network (CAN)

30410 E. Camelback Rd.
Suite 100
Phoenix, AZ 85018

Re: Scottsdale Unified School District -

Dear CAN Leadership Team:

This firm represents Scottsdale Unified School District No. 48 (the "District"), and we have been directed to send you this letter. The District owns a number of marks registered with the Arizona Secretary of State, including the trade name "SUSD," which was registered on October 20, 2020, at file number 9185052 ("Marks"). The District has been using "SUSD" since at least 2000.

It has come to the District's attention that you promoted a "SUSD Parent Back to School Boot Camp" event using the trade name "SUSD" in advertising and promoting the event. A copy of the "SUSD Parent Back to School Boot Camp" announcement and promotion is enclosed with the marks highlighted. Upon information and belief, this event caused actual confusion and could be reasonably considered by others to be District sponsored given the use of the District's trademark. This is only the most recent unauthorized use of the SUSD trade name.

While the District values community dedication and involvement, we have advised the District that it has a legal obligation to monitor the use of its Marks to ensure that any use is only for legitimate and authorized District purposes. If the District fails to monitor its Marks, then its rights could be subject to legal challenge in the future. Therefore, any use of the District's Marks must be formally agreed to in a license agreement allowing certain individuals, entities, and organizations to use SUSD pursuant to preapproved terms. The District has not authorized your action network to use its protected Marks.

GUSTLAW.COM

PHOENIX - TUCSON - WICKENBURG - LAS VEGAS - LOS ANGELES - ALBUQUERQUE - DENVER

Community Advocacy Network (CAN)

2

July 28, 2021 July 28, 2021 July 28, 2021

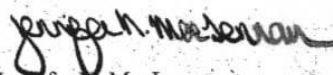
We realize that this area may be unknown to you, but your usage is a trademark infringement:

- Your use of the District's trade name and trademark "SUSD" on the promotional materials for the Parent Boot Camp inaccurately reflects affiliation with and endorsement by the District. We believe that it is likely to cause confusion or mistake as to your association with the District. The use constitutes infringement of and is in violation of the District's trademark rights.
- Your use of the SUSD-CAN name in promotional material is a non-authorized use in commerce of a "copy or colorable imitation" of a trademark in connection with the sale, offering for sale, distribution, or advertising of goods and services, which is likely to cause confusion or mistake, or to deceive persons observing that mark. As a result, we believe that your use constitutes infringement of and is in violation of the District's trademark rights.

In order to protect its trademark rights, both now and in the future, the District has directed us to obtain your written acknowledgement that you have ceased your use of "SUSD" in the advertisement of your network, on social media and in all other materials immediately. In making any changes, it is appropriate to refer to the District with its full name. Please provide the undersigned with written acknowledgment of the succession of the use prior to the close of business this Friday, July 30, 2021.

Thank you for your anticipated cooperation and your dedication to the community. My partner Christina Noyes has acted to protect the District's trademark rights; any questions may be directed to her when she returns to the office on August 3, 2021.

Very truly yours,



Jennifer N. MacLennan
For the Firm

Enclosures

cc: Lori Bird, Esq. (w/encl.)
Christina Noyes, Esq. (w/out encl.)

4191481

45. Upon information and belief, the District selectively enforced its trademark policy and sent the cease and desist letter to SUSDCAN in order to chill group members' speech and retaliate against them for their criticism of SUSDC policies.

46. Photos of the cease-and-desist letter sent from the District's Counsel directly to the Facebook Group were also found in the Google Drive, along with a video of Mark Greenburg and Jann-Michael Greenburg discussing the contents of the letter.

47. Additionally, in a Dossier video taken outside a school board meeting, Mark Greenburg, disguised in a motorcycle helmet and full body motorcycle outfit equipped with a body camera, recorded himself telling another individual that somewhere in the crowd was a private investigator "our law firm hire[d]" to get information without being detected. It is unclear whether the "our" refers to a law firm paid for by the District and taxpayer dollars or the Greenburgs personally. Greenburg also referenced the location of Amanda Wray's car.

48. The District's more clandestine efforts to retaliate against and quash Plaintiff's speech, however, were nothing compared to Defendants' tactical efforts to use the public and private information they had amassed in the Dossier to destroy the businesses, livelihoods, families, and futures of the Plaintiffs and other vocal concerned community members.

49. Using Plaintiff Kim Stafford's employment history from the Dossier, Defendant Mark Greenburg made veiled threats against her employment because she publicly supported in-person schooling. Greenburg suggested she was unethical for having had an online interaction with a disbarred lawyer in the course of her advocacy for in-person schooling, and then stated, "she seems to be an executive at a community minded company, [company name], so one would think she has better judgement." And lest the implication be mistaken, in addition to publicly posting his threat, he also sent it to Ms. Stafford via direct message.

50. Between August 25, 2021, and September 1, 2021, the Scottsdale Parent Council, an association of involved parents in which Amanda Wray was involved, received ten anonymous complaints by email about Amanda Wray which included unfounded and demeaning statements about Ms. Wray. Upon information and belief, Mark Greenburg sent some or all of these complaints using information gleaned from the Dossier and from private District records.

51. Rather than engage in actual dialogue or debate, Mark Greenburg preferred to berate and belittle his opponents. He regularly used terms like “mentally repulsive,” “racist,” “white supremacist,” “psychos” and “parasite,” to refer to Plaintiffs. He referred to one critic as “more like an animal than an actual person.”

52. Speaking of Edmond Richard, Mark Greenburg wrote:



Mark Alan Greenburg
Patrick Mannion I especially love this picture - when a quarter ton racist parasite (I think the largest racist parasite on record) alerts its host of a FB post. What are the odds of Edmond Richard and Guy Phillips teaming up for hate? Edmond is so stupid he's like a dog, who gravitates to anyone who shows him attention. Edmond does not understand that these white supremacists would have him euthanized if they ever came into power. All Phillips had to do was knowledge him by giving him a biscuit, a pat on the head in FB and boom, Edmond is endorsing Phillips and in love.

53. Mark Greenburg also tried to physically intimidate Plaintiffs to prevent them from expressing their point of view.

54. On January 19, 2021, Amanda Wray attended an SUSD Board meeting. Mark Greenburg arrived after the meeting began and made eye contact with Ms. Wray when she turned her head to see who had entered the meeting room. Mark Greenburg initially sat on the left side of the room, with multiple chairs separating he and Ms. Wray. After several minutes, Mark Greenburg, who is a large man, got up and moved seats to sit directly behind Ms. Wray. He repeatedly and purposefully coughed at her. Ms. Wray felt intimidated by Mark Greenburg's actions and made her fears regarding Greenburg's alarming behavior known to the District. The

District, rather than acting to protect Ms. Wray, promptly relayed her concerns, unredacted, directly to the perpetrator. *See* Paragraph 29(a).

55. In later Dossier videos, Mark Greenburg is recorded admitting that his efforts to intimidate and silence the Plaintiffs' speech were undertaken for the District's benefit, informing Jann-Michael Greenburg that he was recording a screen video of activity on the Facebook Group for him.

56. Another favorite tactic of Mark Greenburg was disparaging the public appearance of critics. Shortly after he harassed Ms. Wray at the January 19 Board meeting, using the fake Frank Graham account, he sent her the following message, which was also saved in the Google Drive under the heading "JANUARY 22 AMANDA WRAY POSTING PELOTON."

12:00 AM



I finally saw you in person. You might want to buy a peloton bike.

57. Numerous files in the Dossier demonstrate Mark Greenburg was planning to file frivolous litigation to retaliate against various members of the Facebook Group, including but not limited to Plaintiffs. Dossier videos show Mark Greenburg discussing his idea for a frivolous lawsuit against Amanda Wray with other individuals before a board meeting and trying to goad one of the individuals into filing a false affidavit on his behalf.

58. Jann-Michael Greenburg had a similar penchant for choosing invective rather than debating the merits of his opinions, or of silencing his critics all together. For example, at an August 24, 2021 Board meeting, he whispered the following into his microphone after Amanda Wray made a public comment: "Jesus fucking Christ, these people."

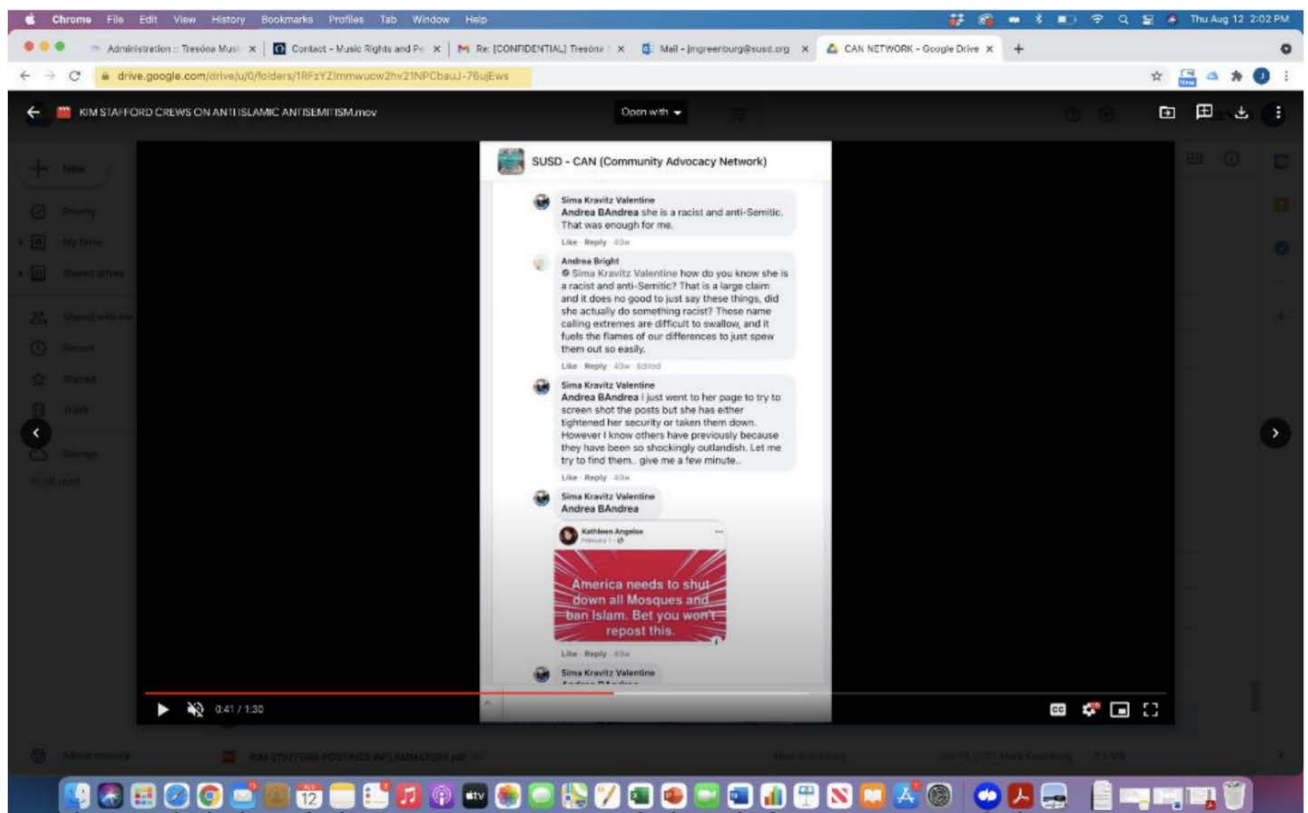
...

59. Jann-Michael Greenburg uses his official Facebook page to engage in public dialogues about SUSD policy. He identifies himself as a “politician” on his official page and lists his SUSD email address.

60. He blocked the Plaintiffs from his official SUSD Facebook page because they expressed viewpoints opposite his. He did not leave open alternate channels of communication, as his Facebook page is the site of public policy discussions that uniquely occur on that page.

61. He did not block the Plaintiffs based on any SUSD policy.

62. Jann-Michael Greenburg also publicly accused Plaintiff Kim Stafford of being anti-Semitic, conspiratorial, and prejudicial. He further chastised her for being a part of the Facebook Group which he claimed had an “inability” to control racist, homophobic, transphobic, anti-Catholic, anti-Semitic, and other discriminatory content.” As proof of his claims, Jann-Michael attached files that, upon information and belief, came from the Google Drive, and involved activity on the Facebook Group that followed Ms. Stafford’s departure from the group. Jann-Michael attached a screenshot of the public Google Drive hyperlink to one of the many files Mark Greenburg had amassed about the Facebook Group.



1 **Ms. Wray Sees the Defendants’ Clearinghouse of Information on SUSD Parents**

2 63. On September 29, 2021, Amanda Wray was provided with a hyperlink to the Google
3 Drive, which was openly accessible by anyone with the link that Greenburg had broadcast, and
4 discovered that Mark Greenburg had stored all the various files described in this Complaint and
5 had shared those files with Board members Jann-Michael Greenburg and Zach Lindsay, as well
6 as Jennifer McDowell, a community member supportive of the Greenburgs.

7 64. When Amanda Wray discovered the staggering amount of information Mark
8 Greenburg had compiled about her or purportedly about her, Ms. Wray became physically ill and
9 vomited.

10 65. In addition to the various documents already described, the Google Drive contained
11 hundreds more files, including:

12 66. A “meme” about Amanda Wray with her professional headshot in the background
13 with the following copy: “Meet Amanda Wray, community activist and moderator of the SUSD
14 CAN Page and wife of Daniel Wray, a VP of Sales for National General Insurance. Ms. Wray
15 advocates for reducing access to Covi-19 [sic] vaccines to the underserved communities within
16 the SUSD School District and believes she has been called by God to offer her dubious financial
17 planning services to families seeking to enroll their children in private religious schools. Ms. Wray
18 might want to get her own financial house in order before giving advice to others. She has two
19 mortgages on her primary residence and used the proceeds of the second mortgage to buy a
20 vacation home in Prescott, which she is operating as an Airbnb. We are so happy to have her here
21 in the Scottsdale Unified School District. Sunshine is the best disinfectant. End racism now within
22 our community.”

23 *[Remainder of this page intentionally left blank.]*
24
25
26
27
28

1 **Meet Amanda Wray,**
2 **and moderator of the**
3 **and wife of Daniel Wray,**
4 **National General**
5 **Wray advocates for**
6 **access to Covi-19**
7 **the underserved**
8 **within the SUSD**
9 **District**
10 **she has been called**
11 **offer her dubious**
12 **planning services to**
13 **seeking to enroll their**
14 **in private religious**
15 **Ms. Wray might want**
16 **her own financial house**
17 **before giving advice to others. She has two mortgages**
18 **on her primary residence and used the proceeds of the**
19 **the second mortgage to buy a vacation home in Prescott,**
20 **which she is operating as an Airbnb. We are so happy to**
21 **have her here in Scottsdale Unified School District.**

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Insurance. Ms.
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to get
in order

Sunshine is the best disinfectant. End racism now within our community.

- 14 a. Multiple versions of a “meme” about another Facebook Group member in which
15 Greenburg attempted to portray her as a racist, including versions of the meme
16 that show a lynched African-American woman next to the parent, one version of
17 which Mark Greenburg did indeed publish.
- 18 b. Multiple videos about an SUSD community member’s court filings, which
19 included references to violence and mental health issues.
- 20 c. Voluminous amounts of screen shots and screen videos of various parents’ social
21 media activity, including posts on the Facebook Group and posts made by
22 Plaintiffs.
- 23 d. Over one thousand pages in unredacted family court documents, which included
24 financial account numbers and deposition transcripts

SUSD Pays Contractor for Social Media Monitoring

26 67. When Defendants’ conspiracy became public, the District hired Hennes
27 Communications, a crisis management and communications firm, which it paid at least
28 \$16,963.00 for consulting and “Social Media Monitoring.”

68. Upon information and belief, prior to this the District had been relying on Mark Greenburg and the information he collected and disseminated for its social media monitoring.

69. The District also hired Loehrs Forensics to do a forensic investigation. The investigation searched four SUSD electronic devices as well as its exchange server (but no personal devices) to determine that “no forensic evidence exist[ed] to support allegations that the [District’s] email server or the personal devices of [the selected individuals] were used to *create, access, modify or share the Google Drive folder.*” (Emphasis added). Tellingly, the District did not ask the forensic examiner to consider whether anything from the email system or District staff was used to *create, access, modify or share information contained within the Google Drive folder.* Upon information and belief, were the investigator to have been tasked with answering this question, the report would have had a much different conclusion.

70. To date, the District still has not provided any answer as to how Superintendent Menzel monitored the internal communications of the private Facebook Group of which he was not a member. The District has also not provided any explanation for how Plaintiffs’ private, unredacted emails to District officials made their way to the Google Drive. These were questions that the forensic investigator was not asked to consider, and, upon information and belief, the District does not want a forensic examiner to consider.

Mark Greenburg Sues Amanda Wray, Twice

71. On January 21, 2022, Mark Greenburg followed through on his threats to file frivolous litigation against Plaintiffs. He filed a lawsuit in the United States District Court for the District of Arizona, Case No. 2:22-cv-00122-DLR, against Amanda Wray and her husband Daniel Wray, claiming that Ms. Wray violated the federal Computer Fraud and Abuse Act when she accessed the publicly available Google Drive whose address Jann-Michael Greenburg had shared.

72. On February 2, 2022, Mark Greenburg filed a lawsuit in the Superior Court of Arizona, Maricopa County, Case No. CV2022-001353, asserting various privacy torts against Amanda Wray and her husband Daniel Wray, arising from Ms. Wray’s statements about the wrongdoing alleged in this Complaint.

73. Mark Greenburg's two lawsuits against Amanda Wray and Daniel Wray demonstrate that Mark Greenburg's actions alleged herein were in part motivated by a desire to enrich his marital community.

COUNT I
VIOLATIONS OF 42 U.S.C. § 1983 (FIRST AMENDMENT RETALIATION)
(ALL PLAINTIFFS AGAINST ALL DEFENDANTS)

74. Plaintiffs reallege and incorporate by reference each of the foregoing paragraphs.

75. "To bring a First Amendment retaliation claim, the plaintiff must allege that (1) it engaged in constitutionally protected activity; (2) the defendant's actions would 'chill a person of ordinary firmness' from continuing to engage in the protected activity; and (3) the protected activity was a substantial motivating factor in the defendant's conduct—i.e., that there was a nexus between the defendant's actions and an intent to chill speech." *Arizona Students' Ass'n v. Arizona Bd. of Regents*, 824 F.3d 858, 867 (9th Cir. 2016) (citations omitted).

76. "Both the Supreme Court and [the Ninth Circuit] have recognized a wide variety of conduct that impermissibly interferes with speech. For example, the government may chill speech by threatening or causing pecuniary harm, . . . ; withholding a license, right, or benefit, . . . ; prohibiting the solicitation of charitable donations, . . . ; detaining or intercepting mail, . . . ; or conducting covert surveillance of church services[.]" *Arizona Students Ass'n*, 824 F.3d at 868 (internal citations omitted).

77. Political speech is core First Amendment speech, critical to the functioning of our republic.

78. Political speech rests on the highest rung of the hierarchy of First Amendment values.

79. Defendants willfully and cooperatively participated in the conspiracy to censor and retaliate against Plaintiffs' political speech while acting under color of state law.

80. Although Mark Greenburg is not a District official, he acted in concert with Jann-Michael Greenburg and the District to chill Plaintiffs' First Amendment rights, such that he acted

1 under color of state law. Jann-Michael Greenburg and the District relied on Mark Greenburg to
2 carry out their goal of suppressing Plaintiffs' speech and worked closely with Mark Greenburg.

3 81. Defendants' actions were designed to retaliate against and chill political expression,
4 activity that strikes at the heart of the First Amendment.

5 82. Defendants engaged in conduct in order to retaliate against Plaintiffs for exercising
6 their rights to freedom of speech and freedom of association by taking actions that would chill or
7 silence a person of ordinary firmness from future First Amendment activities and did so with the
8 intent to cause that chilling effect.

9 83. Defendants jointly acted in concert to abridge Plaintiffs' freedom of speech and
10 deprive Plaintiffs of their First Amendment rights.

11 84. The District demonstrated a pattern and practice of releasing private information in
12 furtherance of the conspiracy, namely providing Mark Greenburg with private correspondence
13 between community members, including Plaintiffs, and SUSD officials.

14 85. The District demonstrated a pattern and practice of using private information
15 supplied by other conspirators to further the goals of the conspiracy. Both Jann-Michael
16 Greenburg and Superintendent Menzel relied upon Mark Greenburg to supply them with
17 information regarding Plaintiffs' activities, including on the private Facebook Group.

18 86. The District demonstrated a pattern and practice of selectively enforcing District
19 policy to quash Plaintiffs' speech.

20 87. Upon information and belief, Jann-Michael Greenburg, as president of the SUSD
21 Board, acted as a final policymaker for the District when the District selectively enforced District
22 policy.

23 88. In addition to acting as a final policymaker for the District, Jann-Michael Greenburg
24 personally took actions to chill Plaintiffs' First Amendment rights, including, but not limited to,
25 participating in the creation and maintenance of the Google Drive, and using its contents to
26 retaliate against those who challenged District policy.

27 89. Plaintiffs engaged in constitutionally protected activity through their speech
28 regarding District policies.

1 90. Defendants targeted and censored Plaintiffs' speech.

2 91. Defendants acted to intimidate Plaintiffs to prevent them from further speech.

3 92. Defendants' actions would chill a person of ordinary firmness from continuing to
4 engage in protected activity.

5 93. Plaintiffs' protected activity, the speech which Defendants found to be
6 objectionable, was a substantial motivating factor in Defendants' decision to censor Plaintiffs'
7 speech.

8 94. Defendants' speech-chilling actions specifically and objectively infringed
9 Plaintiffs' speech rights under the United States Constitution.

10 95. There was a clear nexus between Defendants' actions and the intent to chill
11 Plaintiffs' speech.

12 96. Defendants targeted Plaintiffs' speech because of its content.

13 97. Defendants had no compelling state interest for that content-based restriction.

14 98. Plaintiffs have no adequate remedy at law and will suffer serious and irreparable
15 harm to their constitutional rights unless Defendants are enjoined from violating their
16 constitutional rights.

17 99. Plaintiffs have suffered damages as a result of Defendants' violations of their
18 Constitutional rights in an amount to be proven at trial.

19 100. Mark Greenburg committed the relevant acts with the intent of benefiting his marital
20 community, and Dagmar Greenburg is therefore liable to the same extent as Mark Greenburg.

21 101. Mark Greenburg and Jann-Michael Greenburg acted with an "evil mind" and
22 Plaintiffs are therefore entitled to punitive damages.

23 102. Plaintiffs are entitled to a declaratory judgment stating that Defendants violated their
24 rights under 42 U.S.C. § 1983.

25 103. Plaintiffs are entitled to injunctive relief enjoining any continuing violation of their
26 First Amendment rights by Defendants.

27 //

COUNT II
VIOLATION OF 42 U.S.C. § 1983
(DEPRIVATION OF FIRST AMENDMENT RIGHTS)
(ALL PLAINTIFFS AGAINST JANN-MICHAEL GREENBURG)

105. Plaintiffs reallege and incorporate by reference each of the foregoing paragraphs.

106. Jann-Michael Greenburg blocked Plaintiffs from accessing his official Facebook page, thereby preventing them from engaging in protected speech in a public forum on the basis of an illegal, content-based restriction.

107. Jann-Michael Greenburg was acting under color of law when he blocked Plaintiffs from his official Facebook page.

108. Jann-Michael Greenburg blocked Plaintiffs because of the nature of the opinions and the viewpoints they expressed on his official Facebook page.

109. Jann-Michael Greenburg did not block Plaintiffs in accordance with any content-neutral policy that he or SUSU previously adopted.

110. Jann-Michael Greenburg did not advance any reasonable, substantial, or compelling state interest when he blocked Plaintiffs.

111. Jann-Michael Greenburg did not leave open alternative channels of communication when he blocked Plaintiffs from accessing his official Facebook page.

112. Jann-Michael Greenburg violated Plaintiffs' First Amendment rights to free speech when he prevented them from accessing his official Facebook page.

113. Plaintiffs are entitled to a declaratory judgment stating that Jann-Michael Greenburg violated their rights under 42 U.S.C. § 1983.

114. Plaintiffs are entitled to injunctive relief enjoining any continuing violation of their First Amendment rights by Defendants.

1 115. Plaintiffs found it necessary to engage the services of private counsel to vindicate
2 their rights under the law. Plaintiffs are therefore entitled to an award of attorneys' fees pursuant
3 to 42 U.S.C. § 1988.

4 **COUNT III**
5 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
6 **(ALL PLAINTIFFS AGAINST MARK GREENBURG AND DAGMAR GREENBURG)**

7 116. Plaintiffs reallege and incorporate by reference each of the foregoing paragraphs.

8 117. Mark Greenburg engaged in "extreme" and "outrageous" conduct by amassing
9 voluminous records about Plaintiffs on the Google Drive, including, without limitation,
10 photographs of Amanda Wray and Kim Stafford's respective children, financial documents,
11 background checks, employment information, mortgage information, and more, and sharing that
12 information with SUSD officials and others.

13 118. Mark Greenburg engaged in "extreme" and "outrageous" conduct when he
14 methodically and systematically released personal information about the Plaintiffs in an attempt
15 to retaliate against them for their speech.

16 119. When Mark Greenburg engaged in the foregoing acts, he intended to cause Plaintiffs
17 emotional distress and/or acted in reckless disregard of the fact that emotional distress would
18 occur as a result of his acts.

19 120. Plaintiffs each suffered emotional distress sufficiently severe so as to manifest
20 physical symptoms as a result of Mark Greenburg's actions. For example, Amanda Wray vomited
21 when she discovered the information about her stored on the Google Drive.

22 121. Plaintiffs have been damaged by Mark Greenburg's intentional infliction of
23 emotional distress in an amount to be proven at trial.

24 122. Mark Greenburg committed the relevant acts with the intent of benefiting his marital
25 community, and Dagmar Greenburg is therefore liable to the same extent as Mark Greenburg.

26 123. Mark Greenburg acted with an "evil mind," and Plaintiffs are therefore entitled to
27 punitive damages.
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3 **COUNT IV**
4 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**
5 **(ALL PLAINTIFFS AGAINST MARK GREENBURG AND DAGMAR GREENBURG)**

6 124. Plaintiffs reallege and incorporate by reference each of the foregoing paragraphs.

7 125. Plaintiffs experienced emotional distress when they discovered the existence and
8 contents of the Google Drive.

9 126. Plaintiffs' emotional distress was sufficiently severe so as to manifest physical
10 symptoms as a result of Mark Greenburg's actions. For example, Amanda Wray vomited when
11 she discovered the information about her stored on the Google Drive.

12 127. Mark Greenburg knew or should have known amassing vast amounts of Plaintiffs'
13 and community members' personal records, as well as records that would portray Plaintiffs and
14 community members in a false light, involved an unreasonable risk of causing distress.

15 128. Mark Greenburg knew or should have known that the emotional distress that would
16 likely result from Plaintiffs' discovery of the Google Drive might result in illness or bodily harm.

17 129. Plaintiffs have been damaged by Mark Greenburg's negligent infliction of
18 emotional distress in an amount to be proven at trial.

19 130. Mark Greenburg committed the relevant acts with the intent of benefiting his marital
20 community, and Dagmar Greenburg is therefore liable to the same extent as Mark Greenburg.

21 131. Mark Greenburg acted with an "evil mind" and Plaintiffs are therefore entitled to
22 punitive damages.

23 **COUNT V**
24 **DEFAMATION**
25 **(AMANDA WRAY AGAINST MARK GREENBURG AND DAGMAR GREENBURG)**

26 132. Plaintiffs reallege and incorporate by reference each of the foregoing paragraphs.

27 133. On or subsequent to April 28, 2021, Mark Greenburg placed a bankruptcy filing
28 belonging to one Amanda J. Ross in the Google Drive.

134. Amanda Wray did not learn that Mark Greenburg had done this until she discovered
the contents of the Google Drive in September 2021.

135. Mark Greenburg published Amanda J. Ross’s bankruptcy filing to, at a minimum, Jann-Michael Greenburg, Zach Lindsay, and Jennifer McDowell.

136. The purpose of inclusion of Amanda J. Ross’s bankruptcy filing in the Google Drive was to imply that Amanda Wray, a professional financial advisor, had filed for bankruptcy under her maiden name of “Amanda Ross.”

137. The false notion that Amanda Wray filed for bankruptcy would bring her into disrepute, contempt, or ridicule, as she is a financial advisor, and would also tend to harm her professional reputation.

138. Mark Greenburg knew at the time he published Amanda J. Ross’s bankruptcy filing that Amanda Wray had not filed for bankruptcy, or, at a minimum, acted in reckless disregard to this fact. The evidence for this is that Mark Greenburg obtained Amanda Wray’s background check on January 22, 2021, which showed no such bankruptcy and revealed that Amanda’s middle name began with an “M.” He obtained Amanda J. Ross’s bankruptcy petition on April 28, 2021, after he already had possession of Amanda Wray’s background check.

139. Amanda Wray has suffered damages as a result of Mark Greenburg’s defamation in an amount to be proven at trial.

140. Mark Greenburg committed the relevant acts with the intent of benefiting his marital community, and Dagmar Greenburg is therefore liable to the same extent as Mark Greenburg.

141. Mark Greenburg acted with an “evil mind” and Amanda Wray is therefore entitled to punitive damages.

COUNT VI
FALSE LIGHT INVASION OF PRIVACY
(AMANDA WRAY AGAINST MARK GREENBURG AND DAGMAR GREENBURG)

142. Plaintiffs reallege and incorporate by reference each of the foregoing paragraphs.

143. On or subsequent to April 28, 2021, Mark Greenburg placed a bankruptcy filing belonging to one Amanda J. Ross in the Google Drive.

144. Amanda Wray did not learn that Mark Greenburg had done this until she discovered the contents of the Google Drive in September 2021.

146. It would be highly offensive to a reasonable person in Amanda Wray's position (i.e., a professional financial advisor) to be placed in the false light of having filed for bankruptcy.

147. Amanda Wray has suffered damages as a result of Mark Greenburg's false light invasion of privacy in an amount to be proven at trial.

148. Mark Greenburg committed the relevant acts with the intent of benefiting his marital community, and Dagmar Greenburg is therefore liable to the same extent as Mark Greenburg.

149. Mark Greenburg acted with an “evil mind” and Amanda Wray is therefore entitled to punitive damages.

WHEREFORE, Plaintiffs pray for relief as follows:

A. For judgment in favor of Plaintiffs and against Defendants on all claims set forth in the Complaint;

B. For an award of general, special, and consequential damages in an amount to be proven at trial;

C. For an award of punitive damages;

D. For a declaratory judgment stating that Defendants violated Plaintiffs' rights under the First Amendment of the United States Constitution;

E. For injunctive relief permanently enjoining Defendants from violating Plaintiffs' rights under the First Amendment of the United States Constitution;

F. For an award of Plaintiffs' costs of suit, including reasonable attorneys' fees; and

G. For such other relief that this Honorable Court may deem just and proper.

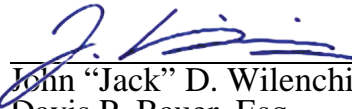
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1 **RESPECTFULLY SUBMITTED** on May 5, 2022.

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25 **ORIGINAL** of the foregoing filed
26 on May 5, 2022, with:

27 Clerk of the Superior Court
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101/201 West Jefferson Street
Phoenix, Arizona 85003

By: 