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9  
10 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
11 **IN AND FOR THE COUNTY OF MARICOPA**  
12

13 BRANDON B. RAFI, an individual; and RAFI  
14 LAW GROUP, PLLC, an Arizona professional  
15 limited liability company;

16 Plaintiffs,

17 v.

18 GIL NEGRETE, an individual; GN  
19 ENTERPRISE PC, a domestic professional  
20 corporation; VALLEY INJURY LAWYERS,  
21 P.C., a domestic professional corporation;  
22 JOHN DOES I-X; JANE DOES I-X; ABC  
23 PARTNERSHIPS I-X; DEF LIMITED  
24 LIABILITY COMPANIES I-X; and XYZ  
25 CORPORATIONS I-X,

26 Defendants.

Case No. CV2024-003021

**FIRST AMENDED COMPLAINT**

(Intentional Infliction of Emotional  
Distress, Defamation, False Light,  
Tortious Interference)

(Assigned to the Honorable Susanna  
C. Pineda)

27 Plaintiffs, by and through undersigned counsel and for their First Amended  
28 Complaint against the captioned Defendants, hereby allege as follows:

**PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff, Brandon B. Rafi (“Rafi”), is an injury attorney who resides in  
Arizona.

1           2.       Plaintiff, Rafi Law Group, PLLC (“RLG”), is a professional limited liability  
2 company formed under the laws of Arizona.

3           3.       RLG is a plaintiff’s personal injury law firm with seven offices throughout  
4 Arizona.

5           4.       Rafi and RLG are collectively referred to herein as “Plaintiffs.”

6           5.       Defendants’ alleged tortious conduct caused things to occur, and Plaintiffs to  
7 suffer damages, in Arizona.  
8

9           6.       Upon information and belief, Defendant Gil Negrete (“Negrete”) is a resident  
10 of Maricopa County, Arizona.  
11

12           7.       Upon information and belief, at all relevant times, Negrete was the owner  
13 and principal of the Law Offices of Gil Negrete P.C.  
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15           8.       On January 1, 2023, Negrete signed and filed Articles of Amendment with  
16 the Arizona Corporation Commission to change the name of Law Offices of Gil Negrete  
17 P.C. to Arizona Hometown Law Firm, P.C.  
18

19           9.       On January 1, 2023, Negrete signed and filed Articles of Amendment with  
20 the Arizona Corporation Commission to change the name of Arizona Hometown Law  
21 Firm, P.C. to GN Enterprise, PC.  
22

23           10.      Law Offices of Gil Negrete P.C. and Arizona Hometown Law Firm, P.C. are  
24 now inactive entities.  
25

26           11.      Defendant GN Enterprise PC (“GN”) is an Arizona domestic professional  
27 corporation with its principal place of business in Maricopa County, Arizona.  
28

1 12. Defendant Valley Injury Lawyers, P.C. (“VIL”) is an Arizona domestic  
2 professional corporation with its principal place of business in Maricopa County, Arizona.

3 13. Defendants Negrete, GN, and VIL will collectively be known as  
4 “Defendants.”  
5

6 14. At all relevant times, Negrete acted for and on behalf of all Defendant  
7 entities. Accordingly, Negrete is personally liable for the tortious conduct alleged herein.  
8

9 15. Alternatively, these Defendants were acting in concert, and therefore, they  
10 are jointly and severally liability for all of the tortious conduct alleged herein.

11 16. At all relevant times, Defendants were operating a law firm(s) competitive  
12 with Plaintiffs’ personal injury law firm.  
13

14 17. The amount in controversy herein exceeds the minimum amount required for  
15 jurisdiction in this Court.  
16

17 18. Upon information and belief, jurisdiction and venue are proper in this Court.

18 **FACTS**

19 19. All of the allegations contained within the paragraphs above and below are  
20 hereby incorporated by reference as if fully set out herein.  
21

22 20. Rafi is the founder and owner of RLG.

23 21. Rafi is a well-reputed lawyer and has grown RLG from a small practice in  
24 2015, into seven offices with substantial success in the personal injury marketplace.  
25

26 22. Rafi’s personal reputation, as well as the business reputation of RLG, are a  
27 substantial basis for Rafi’s massive success.  
28

1           23.    Plaintiffs’ brand name and image are widely known throughout Arizona due  
2 to the substantial resources spent in promoting and advertising Plaintiffs’ brand, which  
3 remains one of RLG’s most important assets.

4           24.    Reputation is everything in the practice of law, but this is especially true with  
5 personal injury law firms.

6           25.    As a result of Plaintiffs’ collective reputations and substantial advertising,  
7 Plaintiffs have become a name trusted by thousands of personal injury clients.  
8

9           26.    Not only do current and prospective personal injury clients trust Plaintiffs’  
10 reputations when they chose to do business with them, but RLG’s employees, referral  
11 sources, other professionals, charities, and other lawyers also trust Plaintiffs for the same  
12 reasons.  
13

14           27.    In addition to billboards, television, radio, and print advertising, Plaintiffs  
15 also depend upon social media and digital marketing to maintain their reputations and build  
16 brand loyalty—a key factor in RLG’s growth and success.  
17

18           28.    Defendants have launched an attack against Plaintiffs that is designed to  
19 cause Rafi substantial distress and to inflict substantial reputational harm upon Plaintiffs.  
20

21           29.    For example, on February 9, 2024, Defendant(s), either acting alone or in  
22 concert with others, made a false report to the police by threatening to bomb RLG’s  
23 Phoenix office located on 24<sup>th</sup> Street for the sole reason of causing an emergency  
24 evacuation and law enforcement to arrive and investigate the bomb threat.  
25

26           30.    This is commonly known as “swatting”, wherein a false report of a bomb,  
27 threat, or other false accusation of violent criminal conduct is reported to the police in order  
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1 to cause law enforcement to take action and investigate the premises, often armed and with  
2 a full squad. The false report is designed to suffer from extreme emotional harm,  
3 embarrassment, distress, and interruption.

4  
5 31. “Swatting” is a crime and is also extremely dangerous, as it places the lives  
6 of all individuals at the falsely reported premises in danger of imminent harm resulting  
7 from armed officers conducting a fast-paced sweep.

8  
9 32. Upon information and belief, the “swatting call” was made by and/or in  
10 concert with Defendants who are engaged in a campaign to inflict maximum distress and  
11 reputational harm against the Plaintiffs.

12  
13 33. The Defendants who caused this recent “swatting” incident were waiting in  
14 the vicinity of RLG’s offices so that they could record images and/or video of the illegal  
15 incident while it was occurring in real time.

16  
17 34. The Defendants who caused this incident also control and operate the  
18 Instagram account “Lawyer Files” (@lawyerfiles), among other social media accounts.

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20 35. The @lawyerfiles Instagram account publishes information about Phoenix-  
21 area lawyers and purports to be a “Lawyer Watchdog Group”, i.e., factual information  
22 about lawyers in Arizona (and nationwide) so that current and prospective clients, and  
23 lawyers, can make an informed decision about lawyers *specifically* based on their  
24 reputation as presented on this “watchdog” page.

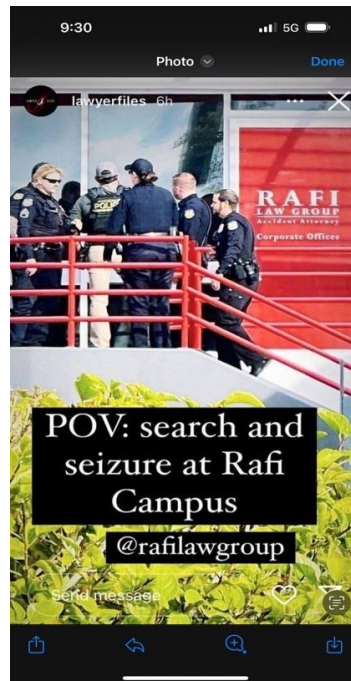
25  
26 36. The Defendants who operate the @lawyerfiles account on Instagram account  
27 published at least two images from the “swatting” incident while it was occurring, in real-  
28 time.

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37. Defendants who operate the @lawyerfiles account published the images to create the false impression that RLG and Rafi were being investigated by law enforcement for illegal conduct, which is absolutely false and specifically designed to inflict maximum reputational harm on RLG and Rafi.

38. Defendants who operate the @lawyerfiles account published images to create the false impression that RLG’s lawyers, including Rafi (the highly visible founder), were drunk and thus caused some illegal misconduct to occur warranting police to arrive and investigate RLG’s office.

39. The two images published to the @lawyerfiles account include no less than the following images that Plaintiffs are aware of:



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40. Accusing a lawyer and his law firm of illegal conduct is defamation per se and does not require proof of actual harm.

41. The @lawyerfiles Instagram account has no less than 68,000 followers, and has an overall reach of several hundred thousand people who will have an opportunity to be exposed to Defendants' false narratives about RLG and Rafi.

42. Upon information and belief, this includes hundreds if not thousands of lawyers who follow the account, including lawyers who may refer cases to RLG and Rafi, and lawyers who are local to Arizona and in the Phoenix area, and current and/or prospective clients who know to review the false and disparaging statements.

43. The Defendants who control and/or operate the @lawyerfiles account have attempted to damage RLG and Rafi's reputation numerous times leading up to this illegal "swatting" and Instagram exposé.

1           44. On September 7, 2023, Defendants published false information about  
2 Plaintiffs in an effort to discredit their brand and reputation in the legal community.

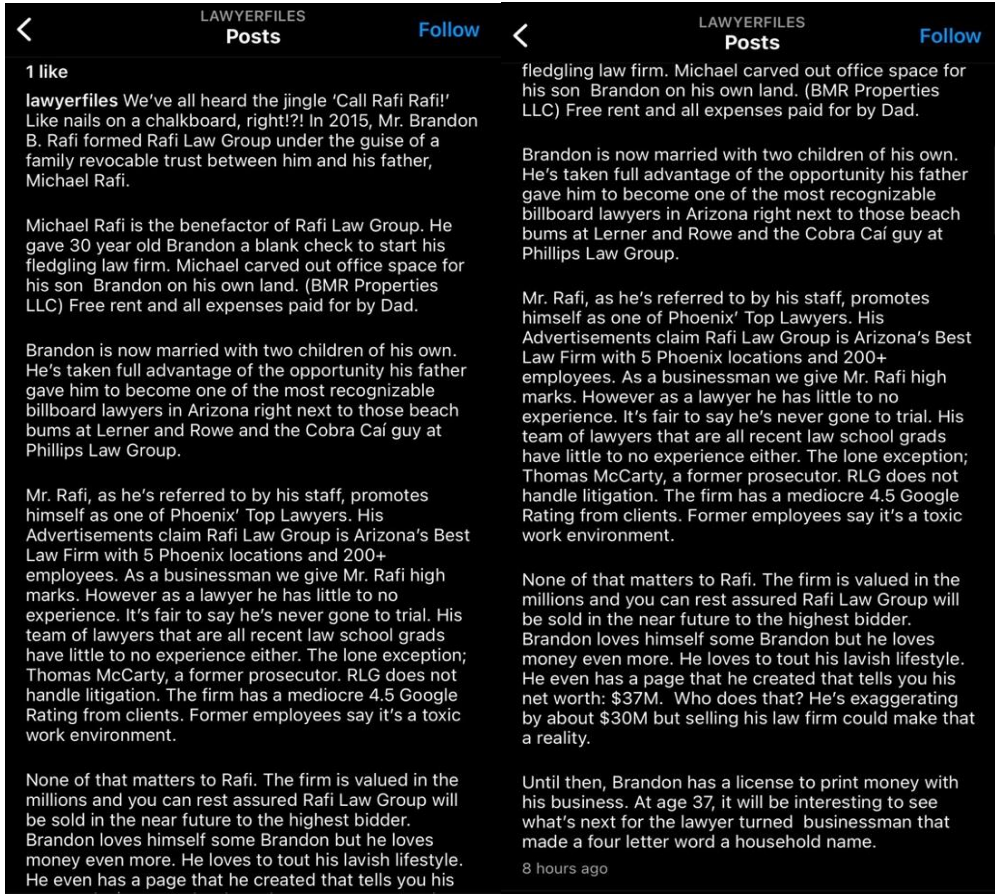
3           45. By way of example, and not limitation, Defendants’ statements that,  
4 “Michael Rafi is the benefactor of Rafi Law Group. He gave 30 year old Brandon a blank  
5 check to start his fledging law firm...Free rent and all expenses paid for by Dad...as a  
6 lawyer he has little to no experience...his team of lawyers that are all recent law school  
7 grads have little to no experience either.”  
8  
9

10          46. This post creates the overall false impression that Plaintiffs are strictly about  
11 money, built his law firm entirely from his father’s alleged funding, and is incompetent to  
12 represent personal injury clients—conclusions that are absolutely false.

13          47. A complete copy of the September 7, 2023, defamatory post is included  
14 below for reference:  
15







16 48. The statement that Rafi relied on this father to fund RLG is false. RLG did  
 17 not require any capital from this father, did not receive a “blank check” or “free rent” from  
 18 his father. The gist of this allegation is to discredit Plaintiffs by making Rafi look  
 19 incompetent and incapable of starting his own law firm.

21 49. The statement that Rafi himself has “little to no experience” is also false, and  
 22 portrays Rafi as an incompetent lawyer, which is also defamation per se, because Rafi has  
 23 personally handled thousands of cases himself and readers will assume that Rafi is  
 24 incompetent.

26 50. The statement that “his team of lawyers that are all recent law school grads  
 27 have little to no experience either.”. is also provably false, because RLG has 22 lawyers on  
 28

1 staff. Of the lawyers that are “recent law school grads”, they have substantial experience  
2 representing injury clients—some of the youngest lawyers have handled hundreds of cases.  
3 The gist of this statement as written causes average readers to believe that RLG has many  
4 lawyers who are inexperienced and thus, incapable of handling their cases. This is  
5 defamation per se.  
6

7 51. After publishing this post, Defendants operating this Instagram account sent  
8 RLG’s Instagram account a direct message threatening to publish a “follow-up” story with  
9 the sole purpose of causing Rafi severe emotional distress.  
10

11 52. Defendants are deranged and desire to get Plaintiffs’ attention at all costs.

12 53. Defendants are also engaged in other offline attacks to cause Rafi severe  
13 emotional distress.  
14

15 54. In addition to the recent illegal “swatting” event, on January 27, 2024, an  
16 individual attempted to invade Rafi’s personal residence by breaking into his personal  
17 residence.  
18

19 55. Upon information and belief, the same Defendants that are engaged in the  
20 online attacks are also responsible for arranging the home invasion.  
21

22 56. Defendants must be stopped before the damage to Plaintiffs’ collective  
23 reputations becomes irreparable.  
24

25 57. Because the false and defamatory statements are visible to the public, and are  
26 connected to RLG and Rafi, Plaintiffs have suffered financial harm due to loss of reputation  
27 and loss of potential clients.  
28

58. By way of example and not limitation, RLG’s employees have seen the

1 defamatory posts, have personally experienced the “swatting” event, and both RLG and  
2 Rafi’s reputations have been negatively impacted by the same.

3 59. Moreover, the “swatting” event has caused RLG substantial business  
4 interference during work hours, given that the entire 24<sup>th</sup> Street RLG office, which is  
5 RLG’s headquarters, was disrupted causing RLG to lose tens of thousands of dollars from  
6 said disruption, in addition to the reputational harm.  
7

8 60. To combat the reputational, financial harm, and distress the aforementioned  
9 false statements stated above (the “False Statements”) and misconduct has created,  
10 Plaintiffs have devoted their time, energy, and resources to combat the misconduct.  
11

12 61. Plaintiffs have incurred, and are continuing to incur, additional marketing  
13 expenses beyond those expenses that Plaintiffs would normally spend in the routine course  
14 of business.  
15

16 62. As a direct and proximate result of Defendants’ tortious conduct, Plaintiffs  
17 have sustained, and will continue to sustain, general and special damages.  
18

19 **COUNT I—DEFAMATION AND DEFAMATION PER SE**

20 63. All of the allegations contained within the paragraphs above and below are  
21 hereby incorporated by reference as if fully set out herein.  
22

23 64. The False Statements made by Defendants are about and concerning  
24 Plaintiffs.  
25

26 65. Without privilege, Defendants communicated the False Statements to third  
27 parties via the Internet and/or intentionally made such statements on the Internet, which  
28 were accessible to third parties without password protection.

1           66.    A third party has viewed and responded to the False Statements published  
2 through the Internet.

3           67.    Given the manner in which the False Statements were shared, it is evident  
4 that the False Statements have been shared with the third party with malice, spite, or ill will  
5 and with the intent of causing harm to the reputation and economic interests of Plaintiffs.  
6

7           68.    The False Statements shared by Defendants impeach the honesty, integrity,  
8 or reputation of Plaintiffs.  
9

10          69.    The False Statements bring Plaintiffs into disrepute, contempt, or ridicule.

11          70.    The False Statements made by Defendants constitute defamation per se and  
12 general damages are presumed as a matter of law.  
13

14          71.    In making and sharing the False Statements, Defendants had knowledge of  
15 or acted in reckless disregard as to the falsity of the False Statements.  
16

17          72.    Defendants shared the False Statements knowing that they would result in  
18 pecuniary loss, as well as irreparable harm.

19          73.    As a direct and proximate result of Defendants sharing the False Statements,  
20 Plaintiffs have sustained, and will continue to sustain, immediate and irreparable harm and  
21 injury including, but not limited to, damage to reputation, losses in revenues, loss of profits,  
22 loss of goodwill, loss of business relations with existing and future business prospects, and  
23 loss of competitive business advantage, opportunity, and/or expectancy.  
24

25          74.    As a direct and proximate cause of the conduct by Defendants, Plaintiff Rafi  
26 has suffered, and will continue to suffer, humiliation, extreme emotional distress, anxiety,  
27 depression, stomach aches, headaches, lack of sleep, lack of a desire to eat, emotional pain  
28

1 and suffering, anguish, and loss of self-esteem.

2 75. Upon information and belief, Plaintiffs have suffered a direct pecuniary loss  
3 as the result of the publication of the False Statements.

4 76. Plaintiffs have suffered general and special damages in an amount to be  
5 proven at trial.

6 77. In making and sharing the False Statements, Defendants acted maliciously,  
7 willfully, wantonly, and unlawfully.

8 78. For such willful and malicious acts, Plaintiffs hereby seek punitive damages  
9 in addition to actual damages.

10 79. Defendants' acts, omissions, conduct, and transactions alleged herein were  
11 aggravated, outrageous, and guided by evil motives wherein Defendants intended to harm  
12 Plaintiffs and/or consciously pursued a course of conduct knowing that it created a  
13 substantial risk of significant harm to Plaintiffs.

14 80. To dissuade Defendants from pursuing a similar course of conduct in the  
15 future and to discourage other persons from similar conduct in the future, an award of  
16 punitive damages should be awarded against Defendants in the sum of sufficient magnitude  
17 to punish Defendants and to deter similar conduct by others.

18 **COUNT II—FALSE LIGHT INVASION OF PRIVACY**

19 81. All of the allegations contained within the paragraphs above and below are  
20 hereby incorporated by reference as if fully set out herein.

21 82. In making and sharing the False Statements that Plaintiff Rafi was subjected  
22 to an illegal search and seizure and that he and/or other lawyers at his office were  
23

1 intoxicated at work, and that Rafi was inept at building RLG but for his father's  
2 contribution, Defendants caused Plaintiff Rafi to be portrayed out of context and in false  
3 light.

4  
5 83. The False Statements made by Defendants are about and concerning  
6 Plaintiff.

7  
8 84. Defendants communicated the False Statements to third parties via the  
9 Internet and/or intentionally made such statements on the Internet, which were accessible  
10 to third parties without password protection.

11  
12 85. Defendants' False Statements are and would be highly offensive to a  
13 reasonable person and have been shared with a least one third party with the apparent intent  
14 of causing harm to Plaintiff.

15  
16 86. In making and publishing the False Statements, Defendants had knowledge  
17 of or acted in reckless disregard as to the falsity of the False Statements and the false light  
18 in which Plaintiff would be placed.

19  
20 87. As a direct and proximate cause of the conduct by Defendants, Plaintiff Rafi  
21 has suffered, and will continue to suffer, humiliation, extreme emotional distress, anxiety,  
22 depression, stomach aches, headaches, lack of sleep, lack of a desire to eat, emotional pain  
23 and suffering, anguish, and loss of self-esteem.

24  
25 88. In making and sharing the False Statements, Defendants acted maliciously,  
26 willfully, wantonly, and unlawfully.

27  
28 89. For such willful and malicious acts, Plaintiff hereby seeks punitive damages  
in addition to actual damages.

1           90. Defendants’ acts, omissions, conduct, and transactions alleged herein were  
2 aggravated, outrageous, and guided by evil motives wherein Defendants intended to harm  
3 Plaintiff and/or consciously pursued a course of conduct knowing that it created a  
4 substantial risk of significant harm to Plaintiffs.  
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6           91. To dissuade Defendants from pursuing a similar course of conduct in the  
7 future and to discourage other persons from similar conduct in the future, an award of  
8 punitive damages should be awarded against Defendants in the sum of sufficient magnitude  
9 to punish Defendants and to deter similar conduct by others.  
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11                           **COUNT III—TORTIOUS INTERFERENCE WITH CURRENT AND**  
12                           **PROSPECTIVE BUSINESS RELATIONSHIPS**

13           92. All of the allegations contained within the paragraphs above and below are  
14 hereby incorporated by reference as if fully set out herein.  
15

16           93. Plaintiffs have existing business relationships with individuals, entities and  
17 organizations relating to their businesses.  
18

19           94. Plaintiffs have a reasonable expectation of future business relationships with  
20 existing clients, prospective clients, referral sources, and others with whom Plaintiffs do  
21 business or with whom Plaintiffs may reasonably expect to do business. This expectancy  
22 is based, in part, on the considerable time, energy, and resources it takes to develop the  
23 goodwill and reputation associated with Plaintiffs’ reputation.  
24

25           95. At all material times hereto, Defendants were aware of Plaintiffs’ existing  
26 and/or prospective business relationships.  
27

28           96. Upon information and belief, Defendants intentionally and/or purposefully

1 interfered with Plaintiffs’ existing and prospective relationships by unlawfully making the  
2 False Statements, including but not limited to initiating a “swatting” event at RLG’s  
3 offices, which interfered with RLG’s business and disrupted employees, and publishing the  
4 images stated above to create the false impression that Plaintiffs were engaging in illegal  
5 conduct in order to warrant a “search and seizure”.

7 97. Defendants communicated the False Statements to third parties via the  
8 Internet and/or intentionally made such statements on the Internet, which were accessible  
9 to third parties without password protection.

11 98. As a direct and proximate result of the Defendants’ conduct, Plaintiffs have  
12 sustained, and will continue to sustain, immediate and irreparable harm and injury  
13 including, but not limited to, damage to reputation, losses in revenues, loss of profits, loss  
14 of goodwill, loss of business relations with existing and future business prospects, and loss  
15 of competitive business advantage, opportunity, and/or expectancy.

18 99. Upon information and belief, Plaintiffs have suffered a direct pecuniary loss  
19 as the result of the publication of the False Statements.

20 100. Plaintiffs have suffered general and special damages in an amount to be  
21 proven at trial.

23 101. In making and sharing the False Statements, Defendants acted maliciously,  
24 willfully, wantonly, and unlawfully.

25 102. For such willful and malicious acts, Plaintiffs hereby seek punitive damages  
26 in addition to actual damages.

28 103. Defendants’ acts, omissions, conduct, and transactions alleged herein were



1 aggravated, outrageous, and guided by evil motives wherein Defendants intended to harm  
2 Plaintiffs and/or consciously pursued a course of conduct knowing that it created a  
3 substantial risk of significant harm to Plaintiffs.

4  
5 104. To dissuade Defendants from pursuing a similar course of conduct in the  
6 future and to discourage other persons from similar conduct in the future, an award of  
7 punitive damages should be awarded against Defendants in the sum of sufficient magnitude  
8 to punish Defendants and to deter similar conduct by others.

9  
10 **COUNT IV—INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

11 105. All of the allegations contained within the paragraphs above and below are  
12 hereby incorporated by reference as if fully set out herein.

13  
14 106. By sharing the False Statements on a well-known Instagram account,  
15 initiating a “swatting” event that caused armed officers to interrupt business to investigate  
16 a false accusation, by causing a home invasion, and making threats to continue this  
17 misconduct, Defendants have made it very difficult for Plaintiff Rafi to carry on with his  
18 day-to-day business activities and have engaged in extreme and outrageous conduct.

19  
20 107. Defendants engaged in the extreme and outrageous conduct with the  
21 intention to cause Plaintiff to suffer severe emotional distress.

22  
23 108. Defendants knew and/or recklessly disregarded the near certainty that such  
24 emotional distress would result from their conduct.

25  
26 109. As a direct and proximate result of Defendants’ extreme and outrageous  
27 conduct, Plaintiff has suffered, and will continue to suffer, severe emotional distress.

28 110. As a direct and proximate result of Defendants’ extreme and outrageous

1 conduct, and knowing the current and prospective clients and referral sources are reading  
2 the False Statements but not being able to do anything about it, Plaintiff has suffered, and  
3 will continue to suffer, humiliation, anxiety, depression, stomach aches, headaches, lack of  
4 sleep, lack of a desire to eat, emotional pain and suffering, anguish, and loss of self-esteem.

5  
6 111. By purposefully engaging in the conduct and refusing to cease and desist the  
7 conduct, Defendants acted maliciously, willfully, wantonly, and unlawfully.

8  
9 112. For such willful and malicious acts, Plaintiff hereby seeks punitive damages  
10 in addition to actual damages.

11 113. Defendants' acts, omissions, conduct and transactions alleged herein were  
12 aggravated, outrageous, and guided by evil motives wherein Defendants intended to harm  
13 Plaintiff and/or consciously pursued a course of conduct knowing that it created a  
14 substantial risk of significant harm to Plaintiffs.

15  
16 114. To dissuade Defendants from pursuing a similar course of conduct in the  
17 future and to discourage other persons from similar conduct in the future, an award of  
18 punitive damages should be awarded against Defendants in the sum of sufficient magnitude  
19 to punish Defendants and to deter similar conduct by others.

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21  
22 **WHEREFORE**, Plaintiffs demand judgment against Defendants as follows:

- 23 A. For a permanent injunction enjoining Defendants from engaging in the  
24 aforementioned tortious misconduct;
- 25  
26 B. For a permanent injunction enjoining Defendants from publishing any other  
27 defamatory material pertaining to Plaintiffs to any third party;
- 28 C. For general, special and punitive damages in an amount to be proven at trial;

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- D. For Plaintiffs’ costs and reasonable attorneys’ fees incurred herein;
- E. For interest on the foregoing attorneys’ fees and court costs at the statutory rate from the date of judgment until paid;
- F. For prejudgment and post-judgment interest on all damages at the highest rate allowed by law from the date of injury until paid in full; and
- G. For such other and further relief as the Court deems just and proper.

DATED this 30<sup>th</sup> day of May, 2024.

**RM WARNER PLC**

By: /s/ Raeesabbas Mohamed, Esq  
Raeesabbas Mohamed, Esq.  
*Attorney for Plaintiffs*

**Original** e-filed via AZTurboCourt  
on May 30, 2024;

**Copy** electronically delivered to:

The Honorable Susanna C. Pineda  
**MARICOPA COUNTY SUPERIOR COURT**  
201 W Jefferson St  
Phoenix, AZ 85003

/s/ Rebekah Triphahn