

1 **Marc J. Victor, P.C.**  
2 3920 S. Alma School Road, Suite 5  
3 Chandler, Arizona 85248  
4 Telephone: (480) 755-7110  
5 Fax: (480) 755-8286  
6 Vicki A.R. Lopez – SBN 010426  
7 [vicki@attorneyforfreedom.com](mailto:vicki@attorneyforfreedom.com)  
8 Attorneys for Plaintiff

9  
10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE DISTRICT OF ARIZONA**

12 GIANLUCA ZANNA and BRIDGET Cause No.  
13 LANGSTON-ZANNA, husband and wife,

14 Plaintiffs,

15 **COMPLAINT**  
16 (Tort – Non-Motor Vehicle)

17 vs.

18 MOHAVE COUNTY, a jural entity; RON  
19 WALKER and JANE DOE WALKER,  
20 husband and wife; TOM SOCKWELL and  
21 JANE DOE SOCKWELL, husband and wife;  
22 BUSTER JOHNSON and JANE DOE  
23 JOHNSON, husband and wife; GARY  
24 WATSON and JANE DOE WATSON,  
25 husband and wife; and WILLIAM  
26 EKSTROM and JANE DOE EKSTROM,  
husband and wife,

Defendants.

---

Plaintiffs, by and through undersigned counsel, hereby alleges as follows:

1. Plaintiffs GIANLUCA ZANNA and BRIDGET LANGSTON-ZANNA are and were, at all times relevant hereto, husband and wife and residents of Mohave County, Arizona.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

2. Defendant MOHAVE COUNTY is a public jural entity and is subject to suit.

3. Upon information and belief, Defendant RON WALKER and JANE DOE WALKER are residents of the State of Arizona.

4. Upon information and belief, Defendants RON WALKER and JANE DOE WALKER are and were, at all times relevant hereto, husband and wife and were acting on behalf of their marital community.

5. Upon information and belief, Defendant TOM SOCKWELL and JANE DOE SOCKWELL are residents of the State of Arizona.

6. Upon information and belief, Defendants TOM SOCKWELL and JANE DOE SOCKWELL are and were, at all times relevant hereto, husband and wife and were acting on behalf of their marital community.

7. Upon information and belief, Defendant BUSTER JOHNSON and JANE DOE JOHNSON are residents of the State of Arizona.

8. Upon information and belief, Defendants BUSTER JOHNSON and JANE DOE JOHNSON are and were, at all times relevant hereto, husband and wife and were acting on behalf of their marital community.

9. Upon information and belief, Defendants GARY WATSON and JANE DOE WATSON are residents of the State of Arizona.

10. Upon information and belief, Defendants GARY WATSON and JANE DOE WATSON are and were, at all times relevant hereto, husband and wife and were acting on behalf of their marital community.

11. Upon information and belief, Defendants WILLIAM EKSTROM and JANE DOE EKSTROM are residents of the State of Arizona.



1 began to exercise their First Amendment rights to pass out flyers regarding Senator  
2 McCain's voting record to other attendees at the Town Hall Meeting. When the  
3 passing of these flyers came to Defendant Buster Johnson's attention, he immediately  
4 instructed them to stop. Defendant Johnson informed Mr. and Mrs. Zanna there was a  
5 law prohibiting them from such an act, and as private citizens "some of their freedom  
6 of speech rights were null and void on county property." Mr. and Mrs. Zanna were  
7 informed they would be "escorted" out of the building if they continued to pass out  
8 Senator McCain's voting record.

9  
10 20. During the time these events took place, Senator McCain, his staff, and  
11 supporters were allowed to exercise their First Amendment rights and were permitted  
12 to pass out flyers and collect signatures.

13 21. Subsequent to the meeting, Mr. and Mrs. Zanna made numerous attempts  
14 to contact the Mohave County Board of Supervisors and the Mohave County Attorney  
15 to obtain an answer to the question of why First Amendment rights did not apply on  
16 county property. No response was received.

17 22. Mohave County Manager, Defendant Ron Walker, and Mohave County  
18 Supervisor, Defendant Tom Sockwell, chose to write derogatory letters about the  
19 Zannas and published them in local newspapers. These published letters were filled  
20 with lies and discriminatory remarks, launching a defamation of character assault.

21 23. Defendants fabricated and developed a county policy prohibiting political  
22 activities and opinions to be disseminated on county property, despite its use as a  
23 public forum, to deprive Mr. and Mrs. Zanna of their First Amendment rights. Such  
24 fabricated policy is evidenced by email correspondence between Defendants Walker  
25 and Ekstrom.

26 24. Such policy prohibiting political activity and opinions on county property,  
used as a public forum, is a violation of the First Amendment.

1           25. Defendant Sockwell wrote a derogatory letter to the local papers stating,  
2 “There is a good reason people are not allowed to politic on county property. ‘We the  
3 people’ should be able to carry out the public’s business without running a gauntlet of  
4 a soapbox activist like Zanna, Langston, or Hanoi Jane.” Soon after his letter was  
5 released, a follow up editorial from the Mohave County Manager was written. This  
6 editorial referred to Mr. Zanna as a part of a “lunatic fringe” and compared Mr. Zanna  
7 to Timothy McVeigh. This editorial from Defendant Walker was clearly intended to  
8 deride and defame Mr. Zanna by inferring that his behavior was that of a terrorist.  
9 This incident was discussed on statewide television news programs with backdrop  
10 images of Timothy McVeigh and Gianluca Zanna. Mr. Zanna also felt it was unfair  
11 that Defendant Walker, on more than one occasion, referred to him as a “naturalized  
12 citizen” and a “former Italian National,” as if his behavior was attributable to the fact  
13 that he was not born an American citizen.

14           26. After numerous slanderous and libelous remarks, and comments and  
15 letters directed towards and about him, Mr. Zanna has become recognizable by the  
16 general public. An example of negative public recognition occurred during a visit to  
17 the post office, when Mr. Zanna was publicly embarrassed in front of at least twenty  
18 people when an employee asked him if, “he was the one that flew the plane into the  
19 IRS building.” These defamatory comments to Mr. Zanna are directly attributable to  
20 the slanderous and libelous public comments by Defendant Walker and Defendant  
21 Sockwell.

22           27. On or about April 20, 2010, Defendant Sockwell gave a public speech to  
23 the Bullhead Republican Women’s Association ridiculing and defaming Mr. Zanna,  
24 further damaging his reputation in an attempt to diminish Mr. Zanna’s position  
25 regarding the incident on November 13, 2009.  
26





1 but not limited to, pecuniary loss, mental anguish, permanent loss of reputation, and  
2 pain and suffering, all in an amount to be proven at trial.

3 45. Defendants' wrongful acts were intended to cause Mr. and Mrs. Zanna  
4 emotional injury, or were motivated by spite or ill will, or said Defendants acted to  
5 serve their own interests, having reason to know and consciously disregard a  
6 substantial risk that their conduct might significantly injure the rights of Mr. and Mrs.  
7 Zanna Thus, Defendants' wrongful acts, therefore, merit an award of exemplary  
8 damages against them in their individual capacities in an amount to be proven at trial  
9 that is sufficient to punish the individual defendants, and to deter the individual  
10 defendants and others from engaging in such wrongful acts in the future.

11  
12 **COUNT FOUR**  
13 **Defamation/Libel/Slander**

14 46. Defendants Walker and Sockwell published statements to the public  
15 regarding the Zannas that were false.

16 47. Such statements impeached the honesty, integrity and reputation of the  
17 Zannas.

18 48. The defamatory statements made by Defendants Walker and Sockwell  
19 specifically named the Zannas.

20 49. Mr. and Mrs. Zanna suffered damage to their reputations.

21 50. As a result of the defamation, libel and slander by Defendants Walker and  
22 Sockwell, the Zannas were exposed and subjected to public hatred, contempt and/or  
23 ridicule.

24 51. Such statements constitute slander and libel *per se* and slander and libel  
25 *per quod*.

