

1 Lisa T. Hauser (#006985)  
2 Mark H. Wagner (#023037)  
3 GAMAGE & BURNHAM, P.L.L.C.  
4 Two North Central Avenue, 18th Floor  
5 Phoenix, Arizona 85004  
6 (602) 256-0566

7 Charles A. Blanchard (#011401)  
8 Michael T. Liburdi (#021894)  
9 Craig A. Morgan (#023373)  
10 PERKINS COIE BROWN & BAIN P.A.  
11 2901 North Central Avenue  
12 Post Office Box 400  
13 Phoenix, Arizona 85001-0400  
14 (602) 351-8000  
15 docketingPHX@perkinscoie.com

16 *Attorneys for Plaintiffs*

ARIZONA SUPERIOR COURT  
MARICOPA COUNTY

17 ARIZONA TOGETHER, an unincorporated association;  
18 AMALIA ANTONIOLI; AL BREZNEY; GLEN  
19 CROMER; TERESA HEWITT; PAUL KNOBBE;  
20 ALBERT LANNON; KAITLIN MEADOWS; REBECCA  
21 MILLER; FRANK MONTOYA; MAXINE PIATT,

22 Plaintiffs,

23 v.

24 JANICE K. BREWER, in her official capacity as  
25 Secretary of State for the State of Arizona,

26 Defendant.

and

PROTECT MARRIAGE ARIZONA, an unincorporated  
association,

Real Party in Interest.

No.

**VERIFIED COMPLAINT**

(A.R.S. § 19-122(C) Challenge  
to Sufficiency of Initiative  
Petition)

(Entitled to Immediate Trial  
Pursuant to A.R.S. § 19-122(C))

1 This is a challenge to the sufficiency of an Initiative petition (the "Initiative")  
2 requiring expedited review under A.R.S. § 19-122(C). For their Verified Complaint, the  
3 Plaintiffs allege as follows:

4 1. Plaintiff Arizona Together is a political committee organized under the laws of  
5 Arizona. Arizona Together's primary purpose is to protect the rights of unmarried couples  
6 in Arizona.

7 2. Plaintiffs Kaitlin Meadows and Albert Lannon are qualified electors, taxpayers  
8 of the State of Arizona and are registered in the Tucson Domestic Partnership Registry. As  
9 individuals registered in the Tucson Domestic Partnership Registry, these Plaintiffs enjoy  
10 formal recognition of their domestic partnership and certain benefits normally afforded to  
11 married couples. The Initiative, if passed, will likely invalidate the Tucson Domestic  
12 Partnership Registry and deny these Plaintiffs the benefits associated with it.

13 3. Plaintiffs Amalia Antonioli and Frank Montoya are qualified electors,  
14 taxpayers of the State of Arizona and are registered in the Tucson Domestic Partnership  
15 Registry. As individuals registered in the Tucson Domestic Partnership Registry, these  
16 Plaintiffs enjoy formal recognition of their domestic partnership and certain benefits  
17 normally afforded to married couples. The Initiative, if passed, will likely invalidate the  
18 Tucson Domestic Partnership Registry and deny these Plaintiffs the benefits associated with  
19 it.

20 4. Plaintiffs Al Brezney and Maxine Piatt are qualified electors, taxpayers of the  
21 State of Arizona and are registered in the Tucson Domestic Partnership Registry. As  
22 individuals registered in the Tucson Domestic Partnership Registry, these Plaintiffs enjoy  
23 formal recognition of their domestic partnership and certain benefits normally afforded to  
24 married couples. The Initiative, if passed, will likely invalidate the Tucson Domestic  
25 Partnership Registry and deny these Plaintiffs the benefits associated with it.  
26

1           5.       Plaintiffs Paul Knobbe and Teresa Hewitt are an unmarried couple and are  
2 qualified electors and taxpayers of the State of Arizona. Plaintiff Paul Knobe is a City of  
3 Phoenix firefighter and currently participates in a domestic benefits program provided by the  
4 City of Phoenix. Plaintiff Teresa Hewitt currently receives domestic benefits from the City  
5 of Phoenix through her relationship with Paul Knobe. The Initiative, if passed, will likely  
6 prohibit the City of Phoenix from providing unmarried employees with domestic partnership  
7 benefits and deny these Plaintiffs the domestic benefits they currently depend on.

8           6.       Plaintiffs Glen Cromer and Rebecca Miller are an unmarried couple and are  
9 qualified electors and taxpayers of the State of Arizona. Plaintiff Glen Cromer is a City of  
10 Phoenix firefighter and currently participates in a domestic benefits program provided by the  
11 City of Phoenix. Plaintiff Rebecca Miller currently receives domestic benefits from the City  
12 of Phoenix through her relationship with Glen Cromer. The Initiative, if passed, will likely  
13 prohibit the City of Phoenix from providing unmarried employees with domestic partnership  
14 benefits and deny these Plaintiffs the domestic benefits they currently depend on.

15           7.       Defendant Janice K. Brewer is the Arizona Secretary of State (the “Secretary  
16 of State”), a public officer of this State and is named as Defendant in this action in her  
17 official capacity. The Secretary of State is the public officer responsible for the conduct of  
18 statewide elections, including elections on statewide ballot measures.

19           8.       Upon information and belief, Real Party in Interest Protect Marriage Arizona is  
20 a political committee organized under the laws of Arizona.

21           9.       This Court has jurisdiction pursuant to Article VI, § 14 of the Arizona  
22 Constitution and A.R.S. §§ 12-123 & 19-122(C)-(D). Under these statutes and constitutional  
23 provision, an action to challenge an initiative petition and to enjoin the Secretary of State  
24 from certifying an initiative for the ballot may be brought by any citizen of the State of  
25 Arizona. Plaintiffs qualify as citizens of the State of Arizona under these statutes and  
26 constitutional provision.





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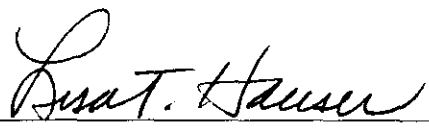
3. An order awarding Plaintiffs' attorneys' fees incurred in this action under the private attorney general doctrine as established in *Arnold v. Ariz. Dep't of Health Servs.*, 160 Ariz. 593, 775 P.2d 521 (1989).

4. An order awarding Plaintiffs' costs.


5. An order awarding Plaintiffs such other and further relief as may be appropriate.

Dated: July 17, 2006.

GAMMAGE & BURNHAM, P.L.L.C.

By   
Lisa T. Hauser  
Mark H. Wagner  
Two North Central Avenue, 18th Floor  
Phoenix, Arizona 85004

PERKINS COIE BROWN & BAIN P.A.

By   
Charles A. Blanchard  
Michael T. Liburdi  
Craig A. Morgan  
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Post Office Box 400  
Phoenix, Arizona 85001-0400

*Attorneys for Plaintiffs*

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VERIFICATION

STATE OF ARIZONA )  
 ) ss.  
County of Maricopa )

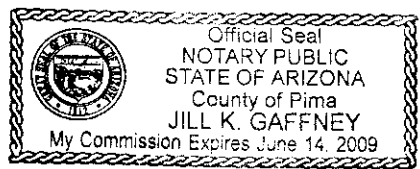
AMALIA ANTONIOLI, a Plaintiff in the foregoing action, being first duly sworn, deposes and says that she has read the foregoing Complaint and she knows the contents therein to be true to the best of her knowledge, except as to those matters stated therein upon information and belief, and as to such matters, she believes them to be true.

Amalia Antonioli  
Amalia Antonioli

SUBSCRIBED AND SWORN to before me this 30<sup>th</sup> day of June, 2006.

Jill K. Gaffney  
Notary Public

My Commission Expires:  
6/14/2009



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VERIFICATION

STATE OF ARIZONA     )  
  ) ss.  
County of Maricopa     )

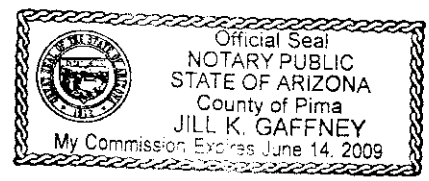
AL BREZNEY, a Plaintiff in the foregoing action, being first duly sworn, deposes and says that he has read the foregoing Complaint and he knows the contents therein to be true to the best of his knowledge, except as to those matters stated therein upon information and belief, and as to such matters, he believes them to be true.

*Al Brezney*  
\_\_\_\_\_  
Al Brezney

SUBSCRIBED AND SWORN to before me this 27<sup>th</sup> day of June, 2006.

*Jill K. Gaffney*  
\_\_\_\_\_  
Notary Public

My Commission Expires:  
6/14/2009



VERIFICATION

STATE OF ARIZONA     )  
                                  ) ss.  
County of Maricopa     )

GLEN CROMER, a Plaintiff in the foregoing action, being first duly sworn, deposes and says that he has read the foregoing Complaint and he knows the contents therein to be true to the best of his knowledge, except as to those matters stated therein upon information and belief, and as to such matters, he believes them to be true.

Glen Cromer  
Glen Cromer

SUBSCRIBED AND SWORN to before me this 1st day of July, 2006.

[Signature]  
Notary Public

My Commission Expires:

6/24/2007







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VERIFICATION

STATE OF ARIZONA     )  
  ) ss.  
County of Maricopa     )

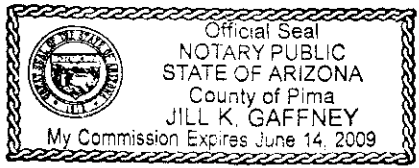
ALBERT LANNON, a Plaintiff in the foregoing action, being first duly sworn, deposes and says that he has read the foregoing Complaint and he knows the contents therein to be true to the best of his knowledge, except as to those matters stated therein upon information and belief, and as to such matters, he believes them to be true.

*Albert Lannon*  
\_\_\_\_\_  
Albert Lannon

SUBSCRIBED AND SWORN to before me this 30<sup>th</sup> day of June, 2006.

*Jill K. Gaffney*  
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Notary Public

My Commission Expires:  
6/14/2009



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VERIFICATION

STATE OF ARIZONA )  
 ) ss.  
County of Maricopa )

KAITLIN MEADOWS, a Plaintiff in the foregoing action, being first duly sworn, deposes and says that she has read the foregoing Complaint and she knows the contents therein to be true to the best of her knowledge, except as to those matters stated therein upon information and belief, and as to such matters, she believes them to be true.

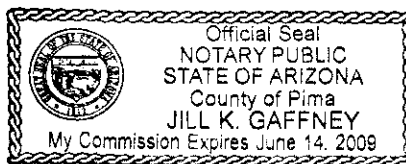
*Kaitlin Meadows*  
Kaitlin Meadows

SUBSCRIBED AND SWORN to before me this 30<sup>th</sup> day of June, 2006.

*Jill K. Gaffney*  
Notary Public

My Commission Expires:

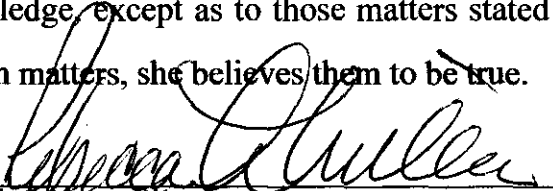
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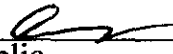
VERIFICATION

STATE OF ARIZONA     )  
                                  ) ss.  
County of Maricopa     )

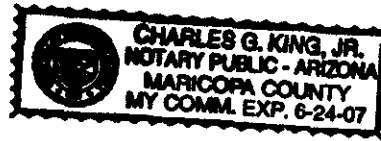
REBECCA MILLER, a Plaintiff in the foregoing action, being first duly sworn, deposes and says that she has read the foregoing Complaint and she knows the contents therein to be true to the best of her knowledge, except as to those matters stated therein upon information and belief, and as to such matters, she believes them to be true.

  
\_\_\_\_\_  
Rebecca Miller

SUBSCRIBED AND SWORN to before me this 1st day of July, 2006.

  
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Notary Public

My Commission Expires:  
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VERIFICATION

STATE OF ARIZONA )  
 ) ss.  
County of Maricopa )

FRANK MONTOYA, a Plaintiff in the foregoing action, being first duly sworn, deposes and says that he has read the foregoing Complaint and he knows the contents therein to be true to the best of his knowledge, except as to those matters stated therein upon information and belief, and as to such matters, he believes them to be true.

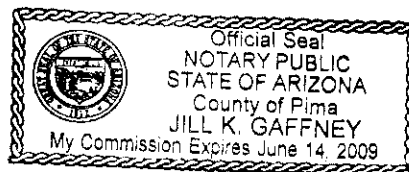
Frank Montoya  
Frank Montoya

SUBSCRIBED AND SWORN to before me this 30<sup>th</sup> day of June, 2006.

Jill K. Gaffney  
Notary Public

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VERIFICATION

STATE OF ARIZONA     )  
  ) ss.  
County of Maricopa     )

MAXINE PIATT, a Plaintiff in the foregoing action, being first duly sworn, deposes and says that she has read the foregoing Complaint and she knows the contents therein to be true to the best of her knowledge, except as to those matters stated therein upon information and belief, and as to such matters, she believes them to be true.

*Maxine J Piatt*  
\_\_\_\_\_  
Maxine Piatt

SUBSCRIBED AND SWORN to before me this 27<sup>th</sup> day of June, 2006.

*Jill K. Gaffney*  
\_\_\_\_\_  
Notary Public

My Commission Expires:  
6/14/2009

