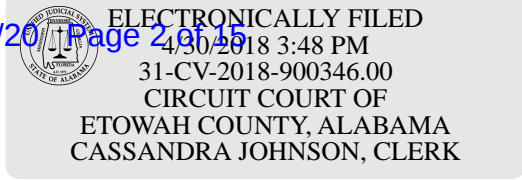


Exhibit 3



**IN THE CIRCUIT COURT OF
ETOWAH COUNTY, ALABAMA**

ROY MOORE,)	JURY TRIAL REQUESTED
KAYLA MOORE,)	
)	
Plaintiffs,)	
)	
vs.)	Civil No. _____
)	
RICHARD HAGEDORN,)	
MARJORIE LEIGH CORFMAN,)	
DEBBIE WESSON GIBSON,)	
BEVERLY YOUNG NELSON,)	
TINA TURNER JOHNSON,)	
FICTITIOUS DEFENDANTS 1-19,)	
)	
Defendants.)	

COMPLAINT

Roy S. Moore and Kayla Moore, residents of Etowah County, Alabama, allege:

PARTIES & VENUE

1. Plaintiff, **Roy Moore**, is an individual over the age of nineteen (19) years and is a resident of Etowah County, Alabama.
2. Plaintiff, **Kayla Moore**, is an individual over the age of nineteen (19) years and is a resident of Etowah County, Alabama.
3. Defendant, **Richard Merlin Hagedorn** (“Hagedorn”), is an individual over the age of nineteen (19) years and is, upon information and belief, a resident of Etowah County, Alabama.
4. Defendant, **Marjorie Leigh Corfman, aka Marjorie Leigh Polston Miles Corfman** (“Corfman”), is an individual over the age of nineteen (19) years and is, upon

information and belief, a resident of Etowah County, Alabama.

5. Defendant, **Debbie Wesson Gibson** (“Gibson”), is an individual over the age of nineteen (19) years and, upon information and belief was a resident of Alabama and is currently a resident of Florida.

6. Defendant, **Beverly Nelson, aka Beverly Young Harris Nelson** (“Nelson”), is an individual over the age of nineteen (19) years and is, upon information and belief, a resident of Anniston, Alabama.

7. Defendant, **Tina Johnson, aka Tina Harvey Turner Lee Sitz Johnson** (“Johnson”), is an individual over the age of nineteen (19) years and is, upon information and belief, a resident of Etowah County, Alabama.

8. Fictitious Defendants, described above as numbers one (1) through nineteen (19), are those persons or entities whose names will be substituted upon learning their true identities.

FACTUAL BACKGROUND

9. On April 26, 2017, Plaintiff Roy Moore (“Judge Moore), with his wife Kayla standing by his side, announced his candidacy for the Alabama U.S. Senate seat that had been vacated by the appointment of Jeff Sessions as United States Attorney General.

10. Prior to that announcement, Judge Moore had twice been elected Chief Justice of the Alabama Supreme Court and had also served in elective office as a circuit judge in Etowah County.

11. Judge Moore came in first in the August 15, 2017 Republican primary for U.S. Senate and also won the run-off election held on September 26, 2017. As the Republican nominee, he faced Democrat Doug Jones in the December 12, 2017 special election.

12. Judge Moore has consistently espoused Biblical principles during his career in public life. No hint of scandal has ever attended any of his contests for public office from the

time he first ran for circuit judge in 1982 until his success in the two Senate primary elections in 2017, a period of 45 years. During that time, he ran for district attorney (1986), was appointed as a circuit judge (1992) and then elected to a full term (1994), was elected Chief Justice of the Alabama Supreme Court (2000), ran for governor twice (2006 and 2010), was re-elected as Chief Justice (2012), and won two primary elections for U.S. Senate (2017).

13. During all his time in public life, beginning with his appointment as Deputy District Attorney for Etowah County in 1977, no suggestion of personal impropriety had ever been raised. Judge Moore has stood for public office eight times in Alabama. Yet 32 days before the December 12, 2017 special election, as he was on the verge of becoming the next U.S. Senator from Alabama, vile accusations of sexual impropriety suddenly appeared in the media.

14. Although the liberal media, eager to bury Judge Moore's candidacy, have repeated over and over the mantra of "nine accusers," in fact only three women alleged improper conduct. Those three accusers, Defendants Leigh Corfman, Beverly Nelson, and Tina Johnson have all defamed Judge Moore by accusing him of immoral acts he never committed and adamantly denies.

15. Corfman through an interview published in the Washington Post accused Judge Moore of sexual misconduct when she was 14 years old in 1979.

16. Nelson on national television accused Judge Moore of attacking her in 1977 when she was 16 and throwing her out of a vehicle when she resisted.

17. Mrs. Johnson accused Judge Moore of grabbing "her buttocks" as she was leaving his law office with her mother after an appointment in 1991.

18. Those accusations involved events that supposedly occurred from 26 to 40

years ago. Yet they all coincidentally surfaced for the first time within a seven-day period, a mere 32 days before the December 12 general election. Corfman's accusation appeared in the Washington Post on Thursday, November 9; Nelson appeared on national television in a press conference with her attorney, Gloria Allred, on Monday, November 13; Johnson's story appeared in AL.com on Wednesday, November 15.

19. On August 14, 2017, Gibson posted on social media that Hagedorn was "right to want outright denouncement from politicians and candidates for office. Silence, especially about Charlottesville, speaks volumes" in reference to Hagedorn's post on August 13, 2017. Hagedorn's post read as follows; "Dear local politicians and Senate candidates... it has come to some of us attention that you have been silent about yesterday's event."

20. Gibson and Hagedorn in their posts revealed their true political agenda months before the Washington Post [hereinafter referred to as "WAPO"] allegations. In fact, on August 13, 2017, according to AL.com, Judge Moore released a statement to the press that read: "The violence and hatred behind the events in Charlottesville is unacceptable and must be stopped. These inexcusable acts will only cause more violence and division in our communities. Now is the time to turn to God and ask Him to change the hearts and heal our land. My prayers go out to those innocent victims involved."

21. Gibson and Hagedorn revealed their true political agenda to ignore the truth in an effort to discredit "local politicians and Senate candidates."

22. On September 20, 2017 Gibson posted a message of support for Doug Jones on her Facebook page which included an announcement that Vice President Joe Biden would visit Alabama to campaign for Jones. Wesson was a sign language interpreter for Hillary Clinton during her 2016 presidential campaign and had interpreted for Joe Biden in 2012. In early 2018 Gibson attempted to qualify as a Democrat to run for a seat in the Florida House

of Representatives.

23. On or about October 12, 2017, Hagedorn met with an agent for the WAPO at the Big Chief Restaurant in Glencoe, Alabama and made statements which were false and defamatory, knowing that they would harm the character and reputation of Judge Moore.

24. Hagedorn's brother, David Hagedorn, is a columnist for WAPO and resides in Washington, D.C., with his male partner. Supreme Court Justice Ruth Bader Ginsburg presided over the high-profile marriage of Hagedorn and his partner in Washington, D.C., while the case of *Obergefell v. Hodges* was pending before her Court. Richard Hagedorn attended the "wedding." Judge Moore had been critical of the same-sex marriage movement and its success in the federal courts prior to his candidacy for U.S. Senate. He had, in particular, criticized Justice Ginsburg for performing same-sex marriages while the legal validity of that practice was at issue in a case pending before her Court.

25. Richard Hagedorn reposted on his Facebook page a message that "Roy Moore tells church congregation a conspiracy of 'lesbians, gays, bisexuals, socialists' are behind his multiple pedophilia accusations." Above that post, he added the headline: "This is why WE fight Roy Moore," revealing his true bias against Judge Moore and his true political motivation for participation in a conspiracy to defeat his candidacy.

26. Further, Hagedorn did conspire and encourage others to make statements defaming Judge Moore's name and reputation.

27. On or about October 13, 2017, Gibson posted a link on her Facebook page to a New York Magazine article entitled: "Democrats Have a Real Chance to Beat Roy Moore They Should Take It." At the time Gibson made this post, the allegations against Judge Moore had not been made public, and he was approximately 11 points ahead in the polls over his Democrat opponent, Doug Jones.

28. In mid-October 2017, Corfman met with Eddie Sexton, an attorney with the firm of Gentle Turner Sexton & Harbison, LLC. Ed Gentle, founding member of the firm, has been the Treasurer of the Alabama Democratic Party since 2011 and wrote an article supporting Doug Jones candidacy for U.S. Senate on August 31, 2017.

29. On November 9, 2017, the day the WAPO article was released, Attorney Sexton stated that Corfman told her story to the WAPO because “it was the right time to do it” and that Corfman had been discussing the matter with WAPO for several weeks.

30. On November 29, 2017, twenty days later, Sharon Rondeau of the ThePostEmail.com reported that Sexton no longer represented Corfman. After calling and speaking with a receptionist from Gentle Turner Sexton & Harbison, LLC, Rondeau was informed that Sexton “is no longer representing [Corfman].” The receptionist stated, “I don’t know who is representing her now, but it’s no one in our firm.” No reason was given for the loss of representation.

31. The WAPO article entitled “Woman says Roy Moore initiated sexual encounter when he was 14, he was 32” was published On November 9, 2017. Corfman’s account to the WAPO was false and malicious. She knowingly, wantonly and intentionally conveyed false information to WAPO in order to defame the character and reputation of Judge Moore, knowing and intending that her false and malicious statements would be republished across Alabama and the nation.

32. Corfman’s actions were rewarded financially and were attended with such notoriety as to encourage her conduct.

33. Hagedorn not only conveyed false and malicious information to the WAPO but escorted its reporters for several days in Etowah County and attended meetings with other individuals, including Corfman and Wesson to further the false and malicious attacks on the

character and reputation of Judge Moore.

34. On the evening of November 9, Hagedorn posted on this Facebook page a picture of his “friend of 40 years” Leigh Corfman, expressing his support and encouragement for her defamatory statements.

35. Two days later, Hagedorn spoke with a reporter of BirminghamWatch.Org and said that he had “known Leigh Corfman for 25 years,” and that he and Corfman talked about Judge Moore over the past “few years” but never in “great detail.”

36. In that article Hagedorn admitted to “drug offenses” and “prison” but failed to disclose that after serving prison sentences for trafficking and possession of cocaine, he was subsequently held in contempt of court by Judge Moore on May 18, 1994 for non-payment of past-due alimony and child support amounting with interest to \$63,154.33. The following day, Judge Moore issued an income withholding for monthly payments of \$600 against that arrearage.

37. Most recently, Hagedorn plead nolo-contendere (no contest) to possession of marijuana in Okaloosa County, Florida.

38. On November 13, 2017, only four days after the publication of the WAPO article and less than 30 days before the date of the special election for U.S. Senate, Beverly Nelson accused Judge Moore of assault and inappropriate advances of a sexual nature in December 1977 resulting in bruising to her neck and being abandoned in a parking lot outside her place of employment. Nelson further claimed that Judge Moore had flirted with her and signed her high-school yearbook. Nelson’s attorney, Gloria Allred, called for a Senate Judiciary Committee investigation into the matter before the election but refused to release the yearbook for examination. Nelson later admitted adding “notes” to the yearbook which she had formerly attributed to Judge Moore. Nelson further stated that Judge Moore

said to her: “You’re just a child and I’m the District Attorney of Etowah County and if you tell anyone about this no one will believe you.”

39. In a televised news conference on November 13, 2017, Nelson further stated that she was attacked “as a child” and was frightened by Judge Moore’s position and power. “I am coming forward to let Mr. Moore know that he no longer has any power over me and I no longer live in hear of him.” Nelson failed to disclose that on June 21, 1991, Etowah County Circuit Judge Roy Moore presided over a divorce action between herself and her husband, Ervine Lee Harris, III. At the petition of both parties Judge Moore signed an order dismissing the divorce action. The signature on the order read “Roy Moore/DA.” The initials “DA” stood for Delbra Adams, Judge Moore’s judicial assistant. That same signature was later forged in Nelson’s yearbook, including the inscription “/DA” which Nelson claimed represented his position as “district attorney,” but actually represented the initials of his assistant, Delbra Adams. (See Plaintiffs exhibit 9.)

40. On November 14, 2017, the day after Mrs. Nelson’s telecast, Hagedorn posted a message of support for Mrs. Nelson on his Facebook page wishing her “Happy Birthday” and encouraging her to go “viral” with her story.

41. Hagedorn’s dislike and animosity toward Judge Moore are reflected in numerous posts on his social media pages and in his close relationships with Wesson, Corfman and Nelson. Those posts include libelous and damaging messages about the character and reputation of Judge Moore.

42. On November 15, 2017, two days after Nelson’s explosive allegations, and only six days after the WAPO story about Corfman, AL.com posted a story that Judge Moore, while in private practice had grabbed Tina Johnson’s buttocks as she and her mother exited his law office in 1991. That statement was false and malicious and constitute slander

and libel. Johnson's story was repeated many times by state and national press outlets.

43. Johnson has a motive to harm the character and reputation of Judge Moore because of a past case in which he represented her mother to change legal custody of her son from herself to her mother.

44. Johnson's mother, Mary Katherine Cofield, signed an affidavit that is in the public record stating that Johnson had a violent nature and had been treated by a psychiatrist when she was approximately 15 years old.

45. On November 21, 2017, Hagedorn posted to social media: "Women of Alabama protect yourselves and your daughters ... Vote Doug Jones ..."

46. On December 4, 2017, a mere four days before Nelson was to confess that she had forged part of the yearbook inscription she had attributed to Judge Moore, Gibson shared with the WAPO a 1982 graduation card from Judge Moore that she had recently discovered in her attic. She claimed that the handwriting on the card was similar to that in Nelson's yearbook, thus seeking to corroborate Nelson's story.

47. On December 26, 2017, two weeks after the special election, Hagedorn posted on his Facebook page a picture of himself at a restaurant in Delray Beach, Florida with his arm around Gibson. He added the mocking caption: "Happy New Year Roy!!"

48. Each of the above-named defendants have committed libel and slander against Judge Moore by making statements which were false, malicious, and made with intentional or reckless disregard of the truth and with the intent that those statements be published to others including through state and national media. Those statements caused harm to the reputation and character of Judge Moore and also to his wife Kayla, lowered their standing in the community, and discouraged members of the community from associating with them. By making such statements to the public media, each of the defendants knew or should have

known that their comments would be widely disseminated, exposing Judge Moore and also his wife Kayla, to disgrace, ridicule, odium and contempt resulting in general and special damages. Judge Moore suffered economic harm both in the U.S. Senate campaign and in time expended refuting the false allegations.

49. Each of the above named individuals conspired and associated with each other in a common design and purpose for the political objective of defaming the character and reputation of Roy and Kayla Moore in such manner as to cause them to experience disgrace, shame and contempt.

50. As a proximate cause of the intentional or reckless publication of defendants' statements, Plaintiffs Roy and Kayla Moore were injured, harmed and damaged as follows:

- (a) Roy and Kayla Moore suffered damage to their reputations;
- (b) Judge Moore was unsuccessful in his bid for a U.S. Senate seat;
- (c) Roy and Kayla Moore suffered financial damage in the form of lost wages and opportunities;
- (d) Roy Moore's opportunity to run for political office was impaired;
- (e) Roy and Kayla Moore suffered loss of their ability to peaceably appear in public places without suffering unwarranted humiliation that was a direct result of defendants' defamatory attacks on their character.

CAUSES OF ACTION

COUNT ONE - NEGLIGENCE

51. Plaintiffs re-allege all preceding paragraphs of the Complaint as if fully set forth herein.

52. At the aforesaid time and place, defendant(s) owed a duty to Plaintiffs to, *inter alia*, refrain from and stop using defaming material that they reasonably or should have reasonably know to be false.

53. Defendants breached their duties to the Plaintiffs by negligently slandering and

allowing said statements to be published about the Plaintiffs, as aforesaid.

54. As a proximate consequence of the negligence of the Defendants, Plaintiffs were injured and damaged as set forth above, herein.

COUNT TWO - WANTONNESS

55. Plaintiffs re-allege all preceding paragraphs of the Complaint as if fully set forth herein.

56. At the aforesaid times and manners, Defendants wantonly and recklessly caused defamatory material to be published and disseminated throughout the State of Alabama and the nation using television, social media and other media outlets, as aforesaid.

57. Defendants made the conscious decision to make defamatory statements that were both false and misleading about Judge Moore with total disregard for the truth and with malicious indifference to the innocence of others.

58. As a proximate consequence of the wantonness and recklessness of the Defendants, Plaintiffs were injured and damaged as set forth above, herein.

COUNT THREE – DEFAMATION

59. Plaintiffs re-allege all preceding paragraphs of this Complaint as if fully set forth herein.

60. At the time and place of the incidents made the basis of this suit, Defendants made statements that they knew to be false or in reckless disregard of the truth and that were defamatory of the Plaintiff. Defendants thereby caused damage to the Plaintiff's reputation and character. Their intentional, reckless, and/or wanton conduct was a proximate cause of the Plaintiff's injuries and damage described above, herein.

COUNT FOUR – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

61. Plaintiffs re-allege all preceding paragraphs of this Complaint as if fully set forth herein.

62. At the aforesaid times and places, Defendants produced and disseminated defamatory material about Judge Moore with a complete disregard for truth and negligently, recklessly, intentionally and/or wantonly caused emotional distress to Roy Moore and Kayla Moore. Defendants are liable to the Plaintiffs in damages for those actions.

COUNT FIVE – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

63. Plaintiffs re-allege all preceding paragraphs of this Complaint as if fully set forth herein.

64. At the aforesaid times and places, and for some time prior Defendants, with the intent to cause damage to the Plaintiffs, did intentionally utter, produce, and disseminate spoken and written communications to harm the reputation and character of Roy Moore. The aforesaid outrageous and shocking acts were done with the intent of causing emotional distress and injury to Roy Moore and Kayla Moore and were a proximate cause of the Plaintiffs' injuries as described above, herein.

COUNT SIX – OUTRAGE

65. Plaintiffs re-allege all preceding paragraphs of this Complaint as if fully set forth herein.

66. At the aforesaid times and places, Defendants—with the intent to cause severe damage to the Plaintiffs' reputation and standing in the community—intentionally or recklessly engaged in extreme and outrageous conduct that caused emotional distress so severe that no reasonable person could be expected to endure it. Fully aware of the probable emotional impact their actions would have on the Plaintiffs, the Defendants nonetheless recklessly and willfully disregarded the consequences of their actions.

COUNT SEVEN – CIVIL CONSPIRACY

67. Plaintiffs re-allege all preceding paragraphs of this Complaint as if fully set forth herein.

68. In addition to committing the underlying torts stated in the previous counts, Defendants agreed and worked together to achieve the common end of damaging the Plaintiffs' reputations in Alabama and nationwide and destroying Judge Moore's prospects for election to the U.S. Senate.

REQUEST FOR RELIEF

1. Plaintiffs demand judgment against Defendants for compensatory damages together with interest from the date of the injuries plus the costs of this action.

2. Plaintiffs request judgment against Defendants for punitive damages in an amount that will adequately reflect the enormity of the Defendants' wrongful, outrageous acts and which will effectively deter other similar wrongful acts.

3. Plaintiffs request further relief as allowed by law and as appropriate.

**PLAINTIFFS DEMAND A TRIAL BY JURY
OF ANY ISSUE SO TRIABLE**

Respectfully submitted,

s/Melissa L. Isaak

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Complaint served by private process server