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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

CONLEY D. WOLFSWINKEL, a single man; BRANDON D. WOLFSWINKEL, a single man; ASHTON A. WOLFSWINKEL, a single man; VANDERBILT FARMS, L.L.C., an Arizona limited liability company; ABCDW, L.L.C., an Arizona limited liability company; STONE CANYON, L.L.C., an Arizona limited liability company; VISTOSO PARTNERS, L.L.C., an Arizona limited liability company; and W HARQUAHALA, L.L.C., an Arizona limited liability company,

Plaintiffs,

v.

JOSEPH ARPAIO and AVA ARPAIO, husband and wife; DAVID HENDERSHOTT and ANNA HENDERSHOTT, husband and wife; JONATHAN HALVERSON and JANE DOE HALVERSON, husband and wife; PATRICK ROSHETKO and JANE DOE ROSHETKO, husband and wife; ANDREW P. THOMAS and ANNE THOMAS, husband and wife; LISA AUBUCHON and PETER R. PESTALOZZI, wife and husband; WILLIAM MONTGOMERY, only in his official capacity as Maricopa County Attorney; and MARICOPA COUNTY, a municipal entity,

Defendants.

No. _____

**C O M P L A I N T
(Jury Trial Requested)**

Plaintiffs allege:

JURISDICTION AND VENUE

1. This is an action brought pursuant to 42 U.S.C. §§ 1983 and 1988 for the recovery of damages and attorneys' fees on account of the deprivation of Plaintiffs' constitutional rights by Defendants acting under color of state law.
2. This Court has subject matter jurisdiction of this action under 28 U.S.C. § 1331.
3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b).

PARTIES

4. Plaintiff Conley D. Wolfswinkel (sometimes, "Conley") is a single man and a resident of Maricopa County, Arizona.
5. Plaintiff Brandon D. Wolfswinkel (sometimes, "Brandon") is a single man and a resident of Maricopa County, Arizona.
6. Plaintiff Ashton A. Wolfswinkel (sometimes, "Ashton") is a single man and a resident of Maricopa County, Arizona.
7. Conley, Brandon, and Ashton are collectively referred to herein as the "Wolfswinkels."
8. Plaintiff Vanderbilt Farms, L.L.C., is an Arizona limited liability company doing business in Maricopa County, Arizona.
9. Plaintiff ABCDW, L.L.C., is an Arizona limited liability company doing business in Maricopa County, Arizona.
10. Plaintiff Stone Canyon, L.L.C., is an Arizona limited liability company doing business in Maricopa County, Arizona.
11. Plaintiff Vistoso Partners, L.L.C., is an Arizona limited liability company doing business in Maricopa County, Arizona.
12. Plaintiff W Harquahala, L.L.C., is an Arizona limited liability company doing business in Maricopa County, Arizona.

13. The plaintiff business entities are referred to collectively herein as “W Holdings” or the “Companies.”

14. Defendants Joseph Arpaio (“Arpaio”) and Ava Arpaio are husband and wife, and residents of Maricopa County, Arizona. All acts of Arpaio alleged herein were committed for the benefit of the Arpaio marital community.

15. Arpaio is, and was at all relevant times, the Sheriff of Maricopa County, Arizona. As such, he is an officer of the County, the head of the Maricopa County Sheriff’s Office (the “Sheriff’s Office”), and holds final policy making authority for the County in the context of criminal law enforcement. Arpaio is sued herein in both his official and individual capacities.

16. Defendants David Hendershott (“Hendershott”) and Anna Hendershott are husband and wife, and residents of Maricopa County, Arizona. All acts of Hendershott alleged herein were committed for the benefit of the Hendershott marital community.

17. Hendershott is, and was at all relevant times, the Deputy Chief of the Sheriff’s Office. As such, he is an officer of the County, and holds final policy making authority for the County in the context of criminal law enforcement. Hendershott is sued herein in both his official and individual capacities.

18. Defendant Jonathan Halverson (“Halverson”) is a resident of Maricopa County, Arizona, and, upon information and belief, is married to Defendant Jane Doe Halverson (whose true name is presently unknown to Plaintiffs), and all acts of Halverson alleged herein were undertaken for the benefit of the Halverson marital community.

19. Halverson is, and was at all relevant times, employed as a Detective with the Sheriff’s Office.

20. Defendant Patrick Roshetko (“Roshetko”) is a resident of Maricopa County, Arizona, and, upon information and belief, is married to Defendant Jane Doe Roshetko (whose true name is presently unknown to Plaintiffs), and all acts of Roshetko alleged herein were undertaken for the benefit of the Roshetko marital community.

21. Roshetko is, and was at all relevant times, employed as a Detective with the Sheriff's Office.

22. Defendants Andrew P. Thomas ("Thomas") and Anne Thomas are husband and wife, and residents of Maricopa County, Arizona. All acts of Thomas alleged herein were committed for the benefit of the Thomas marital community.

23. Thomas was at all relevant times the County Attorney of Maricopa County, Arizona. As such, he was an officer of the County, the head of the Maricopa County Attorney's Office (the "County Attorney's Office"), and was a final policy maker for the County in the context of criminal prosecution and investigation. Thomas is sued herein in both his former official capacity and his individual capacity.

24. Defendants Lisa Aubuchon ("Aubuchon") and Peter R. Pestolozzi are wife and husband, and residents of Maricopa County, Arizona. All acts of Aubuchon alleged herein were committed for the benefit of the Aubuchon/Pestolozzi marital community.

25. Aubuchon was at all relevant times employed by the County Attorney's Office as Deputy County Attorney. Aubuchon is sued herein in both her former official capacity and her individual capacity.

26. Defendants William Montgomery ("Montgomery") presently holds the office of County Attorney of Maricopa County, Arizona. Montgomery is named only in his official capacity as the present holder of the office occupied by Thomas at the time of Thomas' actions alleged herein.

27. Defendant Maricopa County (the "County") is a municipal governmental entity, subject to civil action, responsible for the conduct of its divisions, officers, and employees, including Arpaio, Hendershott, Halverson, Roshetko, Thomas, and Aubuchon.

GENERAL ALLEGATIONS

ARPAIO'S AND THOMAS' DISPUTES WITH THE COUNTY

28. The County is governed by the Maricopa County Board of Supervisors (the "Board"). The Board is made up of five supervisors, each elected to four year terms of office from separate supervisor districts of the County.

29. The Board has statutory authority over all operations of County government, including those of the Sheriff's Office and the County Attorney's Office.

30. Arpaio and Thomas engaged in a years-long series of political disputes with the Board over various issues concerning budgets, administration, and operations of the Sheriff's Office and the County Attorney's Office.

31. In all these disputes, Arpaio and Thomas acted in concert, aligning themselves against the Board and other officers and agencies of County government.

32. It has been the policy, practice, and custom of the Sheriff's Office under Arpaio to use and misuse the law enforcement powers of that office to further political purposes of Arpaio.

33. It was the policy, practice, and custom of the County Attorney's Office under Thomas to use and misuse the criminal prosecution, civil litigation, and investigative powers of that office to further the political purposes of Arpaio and Thomas.

34. Arpaio and Thomas were aided, assisted, and abetted in the execution of such policies, practices, and customs by Hendershott in his role as Deputy Chief of the Sheriff's Office and by Aubuchon in her role as Deputy County Attorney.

35. The disputes between Arpaio and Thomas on the one hand and the Board on the other resulted in a number of politically motivated civil lawsuits, criminal prosecutions, and investigations by the Sheriff's Office and the County Attorney's Office.

36. These events generated significant publicity, which Arpaio and Thomas sought to influence and marshal to their political advantage.

37. In late 2008, Thomas, with the active support of Arpaio, obtained the indictment of Maricopa County Supervisor Donald T. Stapley, Jr. ("Stapley"), for alleged deficiencies in Stapley's public disclosure of certain business investments. Some of the investments which had allegedly not been sufficiently disclosed involved real estate sales and option contracts between Stapley and W Holdings.

38. On December 2, 2008, Arpaio and Thomas held a joint news conference to announce the Stapley indictment. Arpaio and Thomas implied that the Wolfswinkels and

W Holdings may have been attempting to improperly influence Stapley's actions as a member of the Board. Arpaio and Thomas knew or should have known that there was no truth to that accusation.

BUSINESS TRANSACTIONS BETWEEN STAPLEY AND W HOLDINGS

39. The Wolfswinkels, through the business entities that comprise W Holdings, own, manage, and develop real estate projects.

40. At times relevant to this action, W Holdings held a substantial real estate portfolio, including projects in commercial development, as well as land under agricultural or grazing leases planned for future development.

41. The portfolio included land owned by W Holdings, as well as land owned by independent third parties over which W Holdings held management, profit participation, or option contracts.

42. Option contracts provide a common means by which a development company, such as those of W Holdings, can control property for future development, while reducing the amount of cash invested in the property over the long term.

43. In a typical option transaction for W Holdings, property is sold to a third party investor, who simultaneously grants W Holdings an option to repurchase the property, within a specific time frame, and on specific price and payment terms.

44. The concept of a "sale with an option back" is a business model used routinely in connection with real estate held for development. It provides a mechanism for two parties – an investor and a developer – to allocate benefits and burdens in connection with a real estate investment. The investor receives a return on its money in the form of option payments, and will ultimately receive the return of its money if the option is exercised. If the option expires without having been exercised, the investor will have the benefit of ownership of the property for its income and future development potential.

45. The developer in such a transaction, on the other hand, by maintaining the purchase option retains all of the essential responsibilities of ownership, including the right to control, develop, reacquire, and resell the property without having its own funds tied up

in ownership of the land. In addition, the developer retains the flexibility to determine when (or whether) to exercise the option to repurchase the property.

46. Over the years, W Holdings has entered into numerous sale with option transactions, with a variety of third party investors. The transaction terms are the result of arms-length negotiation, and are documented in agreements, escrow instructions, and other papers customary to business real estate transfers. The transfer documents are duly recorded in the public records.

47. One such third party investor purchasing land from W Holdings subject to such options was an Arizona corporation owned and managed by Stapley, known as Arroyo Pacific Investments, Inc. (“Arroyo”).

48. The real estate transactions between Arroyo and W Holdings were all lawful, legitimate business transactions. The contracts all involved land located in Pinal County, Arizona, outside of the jurisdiction of the Board.

49. The first such transaction occurred in August of 2003, when Arroyo contracted for the purchase of approximately 200 acres of land in Pinal County, Arizona, near Arizona Farms Road and Felix Road.

50. Arroyo and W Holdings entered into an option contract, pursuant to which Arroyo received stipulated monthly payments for which W Holdings maintained the right to repurchase the property.

51. In June and July of 2004, W Holdings exercised the option to repurchase the 200 acres. Arroyo then used the proceeds from its resale of the initial 200 acres to enter into similar purchase/option transactions with W Holdings on two other parcels of land: an 80-acre tract of property in a project known as “Arizona Farms,” and a 70-acre tract of property in a project known as “Midway.”

52. The Arizona Farms property is located at Arizona Farms Road and Quail Run Lane; the Midway property is located at Miller Road and Green Road; and both are located in Pinal County, Arizona.

53. The option contracts for the Arizona Farms property and the Midway property remained in effect through all relevant times, pursuant to which W Holdings made regular option payments to Arroyo pursuant to the terms of those contracts, as the same were amended from time to time.

54. All of the payments made to Arroyo by W Holdings were made pursuant to the terms of the option transactions. None of those payments was intended or expected to influence any act of Stapley as an elected official in any matters involving W Holdings or the Wolfswinkels.

55. Throughout the time period of Arroyo's investments with W Holdings, only one matter involving W Holdings came before the Board for decision and action, namely, Maricopa County Planning and Zoning Commission Case No. CPA2006-07, Harquahala Valley Proving Ground, Comprehensive Plan Amendment (the "Harquahala Application").

56. The Harquahala Application concerned some 2,412 acres of land held by W Holdings in an area of Maricopa County known as Harquahala Valley. W Holdings sought a change in the land use designation from rural development area to industrial to permit construction of an automobile proving ground by an automobile manufacturer that had contracted to purchase the property.

57. Prior to its consideration by the Board, the Harquahala Application was duly presented to the Maricopa County Planning and Zoning Commission (the "Commission"). Neither Stapley nor any other members of the Board serve on the Commission. Ultimately, the Commission approved the Harquahala Application with a unanimous vote of 8-0 at a regularly conducted public meeting.

58. After the Commission's approval, W Holdings sought final approval of the Harquahala Application from the Board. The matter was placed upon the formal agenda for the Board regularly scheduled public meeting to be held December 20, 2006.

59. Prior to that meeting, Stapley filed a formal notice with the Clerk of the Board disclosing a conflict of interest on account of "business dealings unrelated to [the Harquahala Application] with the principals of Vanderbilt Farms [a W Holdings company]."

60. As a result, when the matter of the Harquahala Application came before the Board during the regular course of its December 20, 2006 meeting, Stapley recused himself, left the meeting, and took no part in the discussion, consideration, or vote upon the Harquahala Application.

61. Despite these facts, Arpaio and Thomas made the policy decision to fabricate a claim of misconduct in W Holdings' dealings with Stapley, in order to garner media coverage that would assist in their political war against Stapley and Board.

62. Hendershott and Aubuchon, upon information and belief, aided, assisted, and abetted Arpaio and Thomas in carrying out this policy by, among other things, directing and assisting the actions of Halverson and Roshetko described herein.

THE UNLAWFUL SEARCH AND SEIZURE

63. On January 22, 2009, an armed party of ten or more deputies and other investigators from the Sheriff's Office (including Halverson and Roshetko) descended upon the offices of W Holdings to execute an invalid search warrant that Halverson and Roshetko had obtained from a local magistrate.

64. The warrant falsely asserted that there was probable cause to believe that the Wolfswinkels, through W Holdings' dealings with Arroyo, had committed crimes of bribery and fraudulent schemes. The affidavit in support of the search warrant was utterly devoid of facts which would support a finding of such probable cause.

65. The affidavit in support of the search warrant was sworn to and signed by Roshetko. The warrant and affidavit were prepared by Roshetko in collaboration with Halverson and, upon information and belief, Hendershott and Aubuchon. Obtaining and executing the search warrant was in furtherance of the policies of Arpaio and Thomas to generate media coverage damaging to Stapley and the Board, as part of their ongoing political battles.

66. The crux of the argument for probable cause presented in the affidavit was that a former bookkeeper for Arroyo reportedly told investigators that Arroyo began receiving

payments from W Holdings in 2002. This statement raised “suspicion,” according to the affidavit, because the option payments did not begin until 2003.

67. In selectively presenting the facts to the magistrate, however, Halverson and Roshetko failed to state that the bookkeeper was unsure of the date, that she initially thought the payments did begin in 2003, and that she considered the payments part of a legitimate, lawful land transaction.

68. Arpaio and Thomas released copies of the search warrant and affidavit to members of the news media, and Arpaio issued a public statement asserting that the warrant was executed as part of “a new investigation of a bribery case involving Board of Supervisor member Don Stapley and businessman Conley Wolfswinkel.”

69. Ostensibly for the purposes of identifying them, the search warrant and affidavit set forth the birth dates and social security numbers of Conley, Brandon, and Ashton. The copies of those documents that Arpaio and Thomas released to the media did not have the Wolfswinkels’ birth dates and social security numbers redacted, and that personal information was widely displayed in the ensuing news coverage.

70. The execution of the warrant totally disrupted the business operations of W Holdings. Yellow “crime scene” tape was strung across the entrance of the building. Brandon, Ashton, and all employees were diverted from all business activities for the remainder of the day. Those employees not directly required to interface with the search party were kept under armed escort in a back conference room while the search party went about its business.

71. After more than an hour of such confinement, most of the employees were allowed to leave for the day. A small group of employees remained until late that evening, when the search party finally concluded its business.

72. The property seized from the Wolfswinkels and W Holdings pursuant to the search warrant included personal and business papers, files, cell phones, dictation cassette recordings, and the “hard drives” that deputies physically removed from more than a dozen computers in the office.

73. As intended by Arpaio and Thomas, the news coverage of the search was widespread and sensational. Having been alerted by Arpaio and Thomas in advance, television crews took up positions in the parking lot of W Holdings' offices as soon as the search party went in. The story received widespread television and radio news coverage throughout that day and evening, and garnered front-page headlines in newspapers the next day.

74. The illegal search and seizure had a devastating impact on the Wolfswinkels. The Wolfswinkels suffered the humiliation and mental anguish of having been wrongly, and very publicly, accused of crimes of bribery and fraudulent schemes which they knew – and Arpaio and Thomas knew – they had not committed. In addition, the prospect of being wrongfully indicted on such charges was a clear and very real threat as a result of the search warrant, which caused additional fear, anxiety, and mental anguish.

75. The impact on W Holdings was equally devastating. Early 2009 was the height of the crisis in the real estate industry and finance markets in Arizona and in the country at large. W Holdings was then in the process of trying to restructure and otherwise resolve hundreds of millions of dollars in real estate loans, under circumstances in which the trust and confidence of lenders, investors, and other partners was crucial. The negative publicity set in motion by Arpaio and Thomas with the unlawful search and seizure damaged those efforts.

76. The Wolfswinkels and W Holdings, in an effort to counteract the effect of the negative coverage were forced to hire attorneys and take legal action to vindicate themselves. They initiated legal proceedings under Arizona law to controvert the grounds of the search warrant and obtain the return of their property. That effort, conducted at enormous expense, culminated with a final judgment of the Superior Court that “it is undisputed that [the Wolfswinkels and W Holdings] proved that probable cause did not exist for the seizure of the property,” and ordered its return.

77. Damages suffered by W Holdings include out-of-pocket expenses for attorneys' fees, court costs, and other expenses, loss of business, loss of business

opportunities, disruption to business operations, and are likely to include additional harms in the future.

78. The actions of Defendants as alleged herein have deprived Plaintiffs of their clearly established rights under the First, Fourth, and Fourteenth Amendments to the United States Constitution, including the right to be free from unreasonable search and seizure, and the rights to freedom of speech, assembly and association by virtue of falsely and publicly accusing them of illegal conduct and association with Stapley. In so doing, these Defendants acted under color of state law and pursuant to final policy decisions of Arpaio and Thomas and pursuant to the customs, policies, and practices of the Sheriff's Office and the County Attorney's Office as established by Arpaio and Thomas.

79. As a result of the foregoing, Arpaio, Hendershott, Halverson, Roshetko, Thomas, and Aubuchon, each of their respective marital communities, and the County, are liable to the Wolfswinkels and W Holdings for the full extent of all damages resulting from the unlawful search and seizure.

80. In all of their actions as alleged herein, Arpaio, Hendershott, Halverson, Roshetko, Thomas, and Aubuchon all knew or should have known that their conduct would result in the harm and damage to Plaintiffs as alleged herein. These Defendants, however, proceeded in wilful or reckless disregard of the lawful rights and interests of the Plaintiffs, and each of these Defendants, and their respective marital communities, should be assessed punitive or exemplary damages in an amount sufficient to punish them for their misconduct and deter others similarly situated from such actions.

JURY TRIAL REQUEST

81. Plaintiffs hereby request a jury trial as to all issues in this action.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment as follows:

A. Against the Defendants, jointly and severally, for all actual and consequential damages recoverable under 42 U.S.C. § 1983 for the actions alleged herein in an amount to be proven at trial;

B. Against Defendants Joseph Arpaio and Ava Arpaio, David Hendershott and Anna Hendershott, Jonathan Halverson and Jane Do Halverson, Patrick Roshetko and Jane Doe Roshetko, Andrew P. Thomas and Anne Thomas, Lisa Aubuchon and Peter R. Pestalozzi, for punitive damages in an amount deemed sufficient by the jury to punish them and deter others;

C. For an award of attorneys' fees incurred in this action pursuant to 42 U.S.C. § 1988;

D. For Plaintiffs' costs; and

E. For such other and further relief as the Court deems just in the premises.

DATED this 18th day of January, 2011.

COOLEY, LLP

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WRIGHT & ASSOCIATES

By: /s/ Lawrence C. Wright

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Attorneys for Plaintiffs

JS 44 (Rev 12/07)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM)

I. (a) PLAINTIFFS
 Wolfswinkel, Conley D., et al. (see attachment)

(b) County of Residence of First Listed Plaintiff Maricopa
 (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name Address and Telephone Number)
 Lawrence C. Wright, Wright & Associates, 1201 S. Alma School Road, Suite 3500, Mesa, AZ 85210 (480) 969-9000

DEFENDANTS
 Arpaio, Joseph, et al. (see attachment)

County of Residence of First Listed Defendant Maricopa
 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff
 2 U.S. Government Defendant

3 Federal Question (U.S. Government Not a Party)
 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PIF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	SOCIAL SECURITY
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer w/Disabilities - Employment <input type="checkbox"/> 446 Amer w/Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt Relations <input type="checkbox"/> 730 Labor/Mgmt Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret Inc Security Act	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(e))
			FEDERAL TAX SUITS	
			<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify)
 6 Multidistrict Litigation
 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 USC Sec. 1983

Brief description of cause:
Deprivation of constitutional rights under color of state law

VII. REQUESTED IN COMPLAINT:

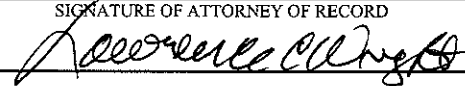
CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ _____

CHECK YES only if demanded in complaint:
 JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE 01-18-2011 SIGNATURE OF ATTORNEY OF RECORD 

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG JUDGE _____

ATTACHMENT TO CIVIL COVER SHEET

Additional Plaintiffs:

Wolfswinkel, Brandon D.
Wolfswinkel, Ashton A.
Vanderbilt Farms, LLC
ABCDW, LLC
Stone Canyon, LLC
Vistoso Partners, LLC
W Harquahala, LLC

Additional Defendants

Arpaio, Ava
Hendershott, David
Hendershott, Anna
Halverson, Jonathan
Halverson, Jane Doe
Roshetko, Patrick
Roshetko, Jane Doe
Thomas, Andrew P.
Thomas, Anne
Aubuchon, Lisa
Pestalozzi, Peter R.
Montgomery, William
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