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**SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING**

INTEL-GE CARE INNOVATIONS LLC;
a Delaware limited liability company;
BONNIE NORMAN, a California resident;
and STEVE BACKERS, a California
resident,

Plaintiffs,

v.

JAMES H. MORRISON, a Washington
resident,

Defendant.

**COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF**

Plaintiffs Intel-GE Care Innovations LLC, Bonnie Norman, and Steve Backers file this Complaint for Damages and Injunctive Relief against Defendant James H. Morrison on personal knowledge as to their own activities and on information and belief as to the activities of others as follows:

I. NATURE OF THE CASE

1. This is an action to enjoin, and recover damages suffered as a result of Defendant Morrison’s harassing, defamatory, and offensive conduct.

2. Morrison posted offensive pornographic content on an online website for owners and enthusiasts of Tesla electric cars. For that reason, the website managers banned Morrison from accessing the site.

3. Morrison mistakenly blames Plaintiff Bonnie Norman, who is a discussion moderator on that website, for his ban. But Norman had no involvement with Morrison’s ban and, until the events described below, had no awareness of or relationship with

1 Morrison.

2 4. In an effort to harass Norman into restoring his access to the Tesla
3 enthusiast website, Morrison retaliated against Norman by contacting her using the online
4 social website Facebook and sending her a series of threatening and harassing messages.
5 In those messages, he threatened to “escalate the issue” and specifically threatened “the
6 escalation will be towards your professional career at Care Innovations.” Plaintiff Intel-
7 GE Care Innovations LLC (“Care Innovations”) is Norman’s employer. Morrison warned
8 Norman that she could “expect a near term response that will have an impact on your
9 personal and professional life and future career prospects.”

10 5. Care Innovations has no connection to Morrison or the website that banned
11 him. Care Innovations is a partnership between two of the largest companies in the
12 world—General Electric Company and Intel Corporation. Care Innovations offers
13 products and services designed to help the sick and the elderly better manage their day-
14 to-day care by connecting them with their care teams. By connecting patients to
15 caregivers via technology, Care Innovations’ products promote patient independence and
16 safety and help providers keep costs down and better manage care.

17 6. After Morrison threatened to “escalate” his retaliation, he directed Norman
18 to visit a website he created located at an Internet domain name consisting of the name of
19 a member of Care Innovations’ senior management, Plaintiff Steve Backers:
20 <<http://www.stevebackers.com>>.

21 7. On that website, Morrison posted a statement falsely attributed to Norman
22 that accused Backers of being a “dangerous child predator” and of possessing child
23 pornography. Morrison also posted a photograph of Backers that he unlawfully copied
24 from the Care Innovations corporate management website and used without permission.
25 Morrison posted Backers’ residential address and a statement—also falsely attributed by
26 Norman—urging Backers’ neighbors with small children to “take reasonable
27 precautions”. A copy of that website is attached as Exhibit A.

28 8. Those accusations are baseless and have caused personal and professional

1 embarrassment and mental anguish to Backers. And the public attribution of these clearly
2 false and disparaging statements to Norman has caused her personal and professional
3 embarrassment and mental anguish.

4 9. At the same time that Morrison registered the <stevebackers.com> Internet
5 domain name, he also registered Internet domain names consisting of the names of
6 several other members of Care Innovations' senior management. Plaintiffs do not know
7 what content Morrison intends to post on websites located at those domain names as part
8 of his ongoing "retaliation" campaign.

9 10. Morrison's defamatory statements have already injured Plaintiffs, and if not
10 enjoined, will continue to substantially and irreparably harm Plaintiffs.

11 11. Care Innovations takes Mr. Morrison's threatening behavior very seriously.
12 Care Innovations' senior management has been diverted from normal business duties to
13 spend time and resources addressing Morrison's serious threats and harmful conduct
14 directed at the company and its employees. Other Care Innovations employees are deeply
15 concerned that Morrison will target them next.

16 12. Plaintiffs file this lawsuit to recover damages and to enjoin Morrison from
17 further unlawful conduct.

18 II. PARTIES

19 13. Defendant James H. Morrison is an individual who resides in King County,
20 Washington.

21 14. Plaintiff Bonnie Norman is a California resident.

22 15. Plaintiff Steve Backers is a California resident.

23 16. Plaintiff Intel-GE Care Innovations LLC is a Delaware limited liability
24 company with its principal place of business in Roseville, California. Care Innovations
25 markets and provides healthcare services to consumers throughout the United States,
26 including in Washington.

27 III. JURISDICTION AND VENUE

28 17. This Court has original jurisdiction over the subject matter of this action

1 pursuant to RCW § 2.08.010.

2 18. This Court has personal jurisdiction over Morrison because he resides in
3 King County, Washington, and is therefore subject to general jurisdiction in this Court.

4 19. Additionally, this Court has personal jurisdiction over Morrison under
5 Washington's long arm statute, RCW 4.28.185(b) because Morrison committed the
6 tortious acts complained of herein in Washington.

7 20. Venue is proper in King County pursuant to RCW § 4.12.025(3)(a) because
8 Morrison committed the tortious acts complained of herein in King County.

9 IV. FACTS

10 21. James Morrison was a registered user on the Tesla Motors Club website
11 located at <www.teslamotorsclub.com> (the "TMC Website"). The TMC Website
12 provides an online forum for Tesla electric-car owners and enthusiasts to exchange ideas,
13 news, and information.

14 22. Morrison's TMC Website account was recently permanently blocked
15 because the TMC Website's owners received repeated complaints about Morrison from
16 other users of the TMC Website.

17 23. Morrison posted links to offensive pornographic material on the TMC
18 Website, which upset other users.

19 24. Plaintiff Bonnie Norman is a forum moderator for the TMC Website. She is
20 also the Director of Quality and Regulatory Affairs at Plaintiff Care Innovations. Care
21 Innovations offers products and services designed to help the sick and the elderly better
22 manage their day-to-day care. Care Innovations has no affiliation or connection with the
23 TMC Website or Morrison.

24 25. On October 27, 2013, Morrison contacted Norman by sending her a private
25 message on the Facebook social networking website. At first, Norman did not know who
26 Morrison was, or how he found her Facebook account.

27 26. Morrison accused Norman of frivolously banning his TMC Website
28 account and told her that he would be "escalating the issue" and specifically that "the

1 escalation will be towards your professional career at Care Innovations.”

2 27. But Norman did not ban Morrison from the TMC Website, and had no
3 authority to do so.

4 28. Morrison also wrote that Norman had “a limited amount of time (days) to
5 correct your mistake” or he would retaliate “in a manner that will have an impact on your
6 personal and professional reputation.” Morrison included a link to Care Innovations’
7 website, confirming his intention to attempt to harm Norman and her employer.

8 29. Norman responded to Morrison that she did not have any authority to ban
9 TMC Website accounts.

10 30. Morrison responded by telling Norman to “drop the stupid act” and
11 repeated his threats of retaliation.

12 31. Morrison wrote: “There will be no more responses. Escalation is
13 happening. Goodbye.” Morrison specifically warned Norman that she could “expect a
14 near term response that will have an impact on your personal and professional life and
15 future career prospects.”

16 32. When Norman asked Morrison to stop bullying and threatening her,
17 Morrison responded that he also planned to “escalate” against other people connected to
18 the TMC Website. He said that his “next trip to the Los Angeles region will include a
19 visit” to the TMC Website owner’s home, and provided the residential address.

20 33. On October 28, 2013, Morrison sent a final message to Norman consisting
21 only of an address for an online website he had created at www.stevebackers.com.

22 34. Steve Backers is employed by Care Innovations as its Director of Human
23 Resources, a senior management position.

24 35. On that website, Morrison posted a picture of Backers taken from his
25 profile on Care Innovations’ website at [http://www.careinnovations.com/about-](http://www.careinnovations.com/about-us/management-team)
26 [us/management-team](http://www.careinnovations.com/about-us/management-team).

27 36. Morrison’s website also includes alarming and false statements accusing
28 Backers of being a “child predator” and of possessing child pornography and publishing

1 Backers' residential address..

2 37. The statement purports to have been made by Norman in connection with
3 her position at Care Innovations, but neither Norman nor Care Innovations made the
4 statement or authorized it.

5 38. Specifically, the statement Morrison posted is:

6 STEVE BACKERS..

7 CHILD PREDATOR

8 Please be aware that we have a dangerous child predator
9 living nearby.

10 During an unrelated investigation, a large number of images
11 depicting graphic child pornography were found on the
12 computer of Steve Backers.

[Backer's residential address has been redacted]

13 This has been reported to the authorities.

14 In the meantime, please take reasonable precautions if you
15 have small children living with you or visiting your home.

16 Thank you,

17 Bonne Durand Norman

18 Director Care Innovations

19 39. Publicly available domain registration records associated with the website
20 Morrison created show that the domain name he used, <stevebackers.com> was
21 registered on October 28, the day after Morrison threatened Norman with "escalation"
22 and "retaliation", and immediately before he sent Norman the link to the website he
23 created..

24 40. On October 28, 2013, Morrison registered other Internet domain names
25 including, <ericdishman.com>, <marcusgrindstaff.com>, <jamespursley.com>, and
26 <seanslovenski.com>.

27 41. Each of those domain names corresponds to the name of a high-level
28 executive at Care Innovations: Eric Dishman is Director of Health Policy; Marcus
Grindstaff is Director of Strategic Planning and Product Management; James Pursley is

1 Vice President of Sales & Marketing; and Sean Slovenski is Chief Executive Officer.

2 42. Plaintiffs do not know how many other domain names Morrison has
3 registered in connection with his retaliation campaign.

4 43. Norman has been seriously alarmed, annoyed and harassed by Morrison's
5 threatening messages, his attempts to extort her, his promise to "escalate" matters, the
6 creation and publication of the website with false accusations of criminal activity against
7 Backers that are falsely attributed to Norman, and the registration of domain names
8 corresponding to other Care Innovations employees.

9 44. Norman fears for her safety as a result of Morrison's actions. Norman's
10 neighbors have posted signs warning the community about Morrison's threats and urging
11 them to report any suspicious activity. Norman's neighbors also check her home to
12 confirm it is safe before letting Norman enter.

13 45. Backers also is distressed by Morrison's actions. Backers was shocked and
14 embarrassed to find that Morrison had created and published a website located at a
15 domain name consisting of his name and featuring his picture that falsely represents that
16 he is a child predator and in possession of child pornography, which is a serious crime.

17 46. Plaintiffs are concerned that Morrison will use other domain names he has
18 registered to post false, defamatory, and inflammatory statements about them and other
19 Care Innovations employees.

20 47. Following the advice of security experts, Care Innovations has hired a
21 security guard to monitor its business premises during business hours and to escort
22 Norman to and from her car when she arrives and departs from work. The presence of on-
23 site security and other repercussions caused by Morrison's conduct have caused Care
24 Innovations employees to worry, become distracted, and be less productive.

25 48. Morrison's conduct has caused significant disruption to Care Innovations'
26 business. If Care Innovations' executives and senior management, including those which
27 Morrison has already targeted and those which he apparently intends to target, are falsely
28 accused of criminal and immoral activity—Care Innovations' business reputation will be

1 harmed.

2 **V. FIRST CAUSE OF ACTION**

3 **Defamation**

4 **By Plaintiffs Backers, Norman, and Care Innovations**

5 49. Plaintiffs incorporate by reference Paragraphs 1 through 48 above as
6 though fully set forth herein.

7 50. Morrison's wrongful conduct constitutes false unprivileged
8 communications.

9 51. Morrison knew or should have known that his inflammatory false and
10 misleading statements of fact concerning Backers, Norman, and Care Innovations would
11 cause damage to their respective reputations.

12 52. Morrison's defamatory words were directed at Backers, Norman, and Care
13 Innovations and are defamatory per se because they impute criminal activity and expose
14 them to hatred, contempt, and ridicule and are intended to deprive them of public
15 confidence and social intercourse.

16 53. Backers and Norman have incurred significant emotional distress and
17 anguish as a result of Morrison's conduct.

18 54. Backers, Norman, and Care Innovations have suffered and continue to
19 suffer harm because of Morrison's wrongful conduct that is likely to continue until
20 Morrison's conduct is enjoined.

21 55. As a direct, proximate, and foreseeable result of Morrison's activities,
22 Backers, Norman, and Care Innovations have been damaged in an amount to be
23 determined at trial.

24 **VI. SECOND CAUSE OF ACTION**

25 **Intentional Infliction of Emotional Distress**

26 **By Plaintiffs Backers and Norman**

27 56. Plaintiffs incorporate by reference Paragraphs 1 through 55 above as
28 though fully set forth herein.

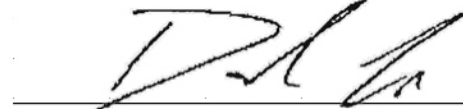
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Dated this 30th day of October, 2013.

Respectfully submitted,

NEWMAN DU WORS LLP

By:



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Attorneys for Plaintiffs
Bonnie Norman, Steve Backers, and
Intel-GE Care Innovations LLC