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**IN THE THIRD JUDICIAL DISTRICT  
SALT LAKE COUNTY, STATE OF UTAH**

<p>GOUD MARAGANI,</p> <p style="text-align: center;">Plaintiff,</p> <p>vs.</p> <p>TROY WILLIAMS, an individual; EQUALITY UTAH, a Utah non-profit corporation; and EQUALITY UTAH FOUNDATION, a Utah for-profit corporation,</p> <p style="text-align: center;">Defendants.</p>	<p style="text-align: center;"><b>COMPLAINT</b></p> <p>Case No. _____</p> <p>Judge _____</p>
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Plaintiff Goud Maragani, by and through his counsel, hereby complains against Defendants Troy Williams, Equality Utah, and Equality Utah Foundation and for his causes of action alleges as follows:

## I. INTRODUCTION

1. Plaintiff Goud Maragani brings this action, resting in tort, against Defendants Troy Williams, Equality Utah, and Equality Utah Foundation (together, “Equality Utah”) because they intentionally and repeatedly defamed him, placed him in a false light, and tortiously interfered with his economic advantage.

2. Mr. Williams, Executive Director of Equality Utah, made intentional and reckless defamatory statements to destroy Mr. Maragani’s reputation and used improper means to interfere with his employment and damage his legal career. Through his actions, Mr. Williams increased his own fame and served Equality Utah’s interests by promoting its own political positions.

3. Mr. Williams repeated his false and defamatory claims online, solicited others to republish them, and repeatedly directed the defamatory statements to Mr. Maragani’s employer with the intent to harm Mr. Maragani.

4. Defendants further knowingly and recklessly portrayed Mr. Maragani in a false light to his employer through highly offensive statements, which caused such offense that his employer terminated him.

5. Equality Utah endorsed and coordinated Mr. Williams’ defamatory and malicious statements to Mr. Maragani’s employer.

6. As a direct result of Mr. Williams and Equality Utah’s actions, Mr. Maragani’s employer terminated him, leaving him with no job and a besmirched reputation in his legal career.

7. Mr. Williams remains the Executive Director of Equality Utah. Equality Utah promotes itself as “the state’s largest LGBTQ civil rights organization.”

## **II. PARTIES**

8. Plaintiff, Goud Maragani, is a resident of Riverton, Utah. During the events giving rise to the complaint, Mr. Maragani was employed as an attorney in the General Counsel's Office at Lucid Software Inc. ("Lucid").

9. Upon information and belief, Defendant Troy Williams is a resident of Salt Lake City, Utah.

10. Mr. Williams is presently the Executive Director of Equality Utah. Mr. Williams became the Executive Director of Equality Utah in the fall of 2014 and remains the organization's Executive Director today.

11. Equality Utah is an IRS 501(c)(4) organization that represents and leads the "efforts for LGBTQ civil rights at the state and local levels by sponsoring LGBTQ legislation and opposing negative bills; lobbying elected officials; building coalitions; and empowering individuals and organizations alike to engage in the legislative process."

12. Defendant Equality Utah Foundation is a Utah for-profit corporation.

13. Defendants Equality Utah and Equality Utah Foundation are located at 350 E. 400 S, Suite 305, Salt Lake City, Utah, 84111.

14. Troy Williams, in his personal capacity and as Executive Director, acted in concert and on behalf of Equality Utah and Equality Utah Foundation.

## **III. JURISDICTION AND VENUE**

15. Jurisdiction is proper pursuant to Utah Code § 78A-5-102(1).

16. Venue is appropriate under Utah Code § 78B-3a-201 as the events giving rise to the complaint occurred in Salt Lake County, Utah, and at least one defendant resides in Salt Lake County.

17. According to the damages sought below, Plaintiff designates this action as a Tier 2 case.

#### **IV. FACTS**

18. Mr. Maragani is an attorney who was working for his employer in the Office of General Counsel starting June 8, 2020.

19. Mr. Maragani has been a member of the Utah Republican Party's State Central Committee during his personal time and during the relevant events described in this Complaint.

20. Mr. Maragani was the President of Utah Log Cabin Republicans until the Utah chapter was dissolved by the national Log Cabin Republicans on October 30, 2023.

21. Mr. Maragani is now Chairman of the successor organization, the Utah Gay-Straight Coalition.

22. The Utah Log Cabin Republicans are a conservative LGBTQ+ group that does not support interference with minors medically or otherwise to transition children to a different sex.

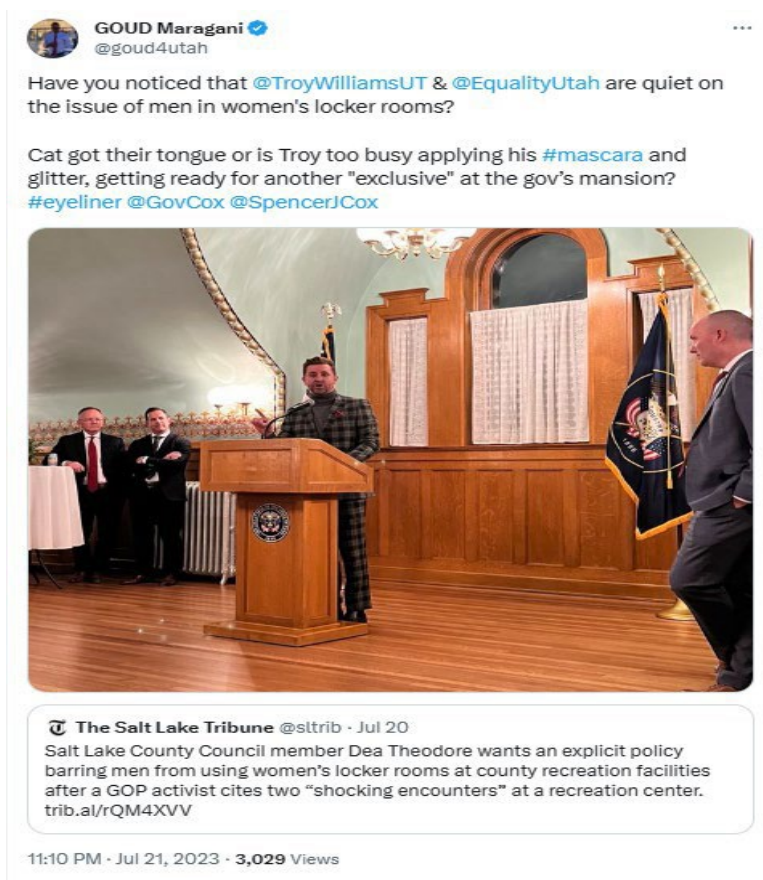
23. Mr. Maragani is Christian. He is also gay, a racial minority as an Indian American, and a military veteran.

24. Mr. Maragani is opposed to Equality Utah's promotion of its political position regarding transgender issues in Utah, which includes its policy on transitioning children to a different sex, allowing biological boys to play girls' sports, and allowing biological boys/men to use girls'/women's restrooms and locker rooms. That opposition is based on his political and Christian religious beliefs.

25. In connection with the above and through his own personal interests, Mr. Maragani is an active political figure and frequently contributes to state and national political discussion.

26. By way of background, on February 25, 2023, Director of the Governor’s Office of Families and Salt Lake County Council member Aimee Winder Newton helped Equality Utah’s Political Action committee (“PAC”) raise \$45,000 to defeat conservative Republicans who oppose Equality Utah’s agenda.

27. As shown below, on July 21, 2023, Mr. Maragani, in his capacity as a member of the Utah Republican Party’s State Central Committee, posted information on social media regarding a policy issue related to men in women’s locker rooms— one that Equality Utah disagreed with.



28. On August 1, 2023, at 2:24 PM, unbeknownst to Mr. Maragani, Mr. Williams, from his Equality Utah email address, emailed Kat Judd, Manager of Human Resources at Lucid, with the subject line, “*Concern about ongoing attacks from Lucid employee.*”

29. In the August 1, 2023, email, Mr. Williams stated in relevant part,

I’m writing out of concern from a member of the Lucid team who has been engaging in **disturbing behavior** toward us. Goud Maragani is demonstrating a **bizarre and disturbing obsession** with me and our Equality Utah team. I know that we have another training set upon August 11<sup>th</sup> with our transgender trainer, Olivia Jaramillo. **I’m concerned that he will begin to attack her as well. Is Lucid going to be a safe environment for her?** Can we jump on a call this week and talk through this? This is just a small sample of the bile that Gould [sic] regularly posts. And while Equality Utah was at the GOP convention building bridges with delegates, he was passing out vile, offensive and misleading flyers about our organization. **I’m very worried that his extreme transphobic rhetoric may also endanger transgender people throughout the state.** Thank you for considering this request to talk.

All the best,  
Troy

Email to Mr. Maragani’s Employer (Aug. 1, 2023) (emphasis added).

30. Included with the email were several screenshots of posts that Mr. Maragani made from his personal (@goud4utah) and Utah Log Cabin Republicans (@utahlcr<sup>1</sup>) social media accounts.

31. In a second email dated August 1, 2023, Mr. Williams and Equality Utah sent a follow-up email to Mr. Maragani’s employer, stating:

Sorry, I forgot to include one more tweet (there are so many to choose from). Goud sent this thru his LCR account, viciously speculating that Sue Robbins, a transgender advocate who works closely with Equality Utah, simply has a sexual fetish. Goud has been regularly advancing a “grooming” narrative, to demonize transgender people, and positioning them as a threat to children. These tweets put our community in danger. They are cruel, disgusting and dehumanizing.

32. On Saturday, August 5, 2023, as shown below, in Mr. Maragani’s capacity as a member of the Utah Republican State Central Committee, Mr. Maragani proposed censuring Ms. Winder

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<sup>1</sup> After the creation of the Utah Gay-Straight Coalition, the @utahlcr X, formerly Twitter, handle was changed to @utahgsc,

Newton because she raised money for Equality Utah's PAC and sought and received the endorsement of Equality Utah's PAC.

**RESOLUTION TO CENSURE AIMEE  
WINDER NEWTON**

*Sponsored by Goud Maragani*

**WHEREAS**, the primary objective of the Utah Republican Party is to carry the values of its platform and the US Constitution into public policy via the election of its candidates. A key component of Republican values is the promotion and preservation of the traditional family.

**WHEREAS**, on August 13, 2022, the Utah GOP State Central Committee (SCC) overwhelmingly passed a [Resolution on Protecting Those Most Vulnerable](#), stating that *"The Utah Republican Party fully supports the banning of affirmation surgeries, hormone therapy, and puberty-blocking procedures for the purpose of elective gender transitioning on minors. We stand behind all of our elected officials in their efforts against these harmful and irreversible procedures being performed on Utah's children."*

**WHEREAS**, Equality Utah is a left-wing organization that promotes:

- [Giving puberty blockers, cross-sex hormones, and sex reassignment surgeries to minors](#);
- [Pornographic books](#) in schools (e.g. *"Gender Queer"* and *"This Book is Gay"*);
- [Educators socially transitioning children in school without the knowledge of their parents](#);
- [Teaching children between the ages of 5-8](#) about gender identity and sexual orientation;
- [Sexually explicit performances in front of children](#);
- [Biological boys participating in girls' sports and using female locker rooms and bathrooms](#);

33. On August 7, 2023, Mr. Williams, through his Equality Utah email address, sent another follow-up email to Ms. Judd:

I'm disappointed I haven't received a response from you yet. I wanted to give you a heads up that Goud's attacks on Equality Utah, Councilmember Aimee Winder Newton and the transgender community have escalated and will be hitting the press soon. KSL and the Salt Lake Tribune have both reached out to me for comment.

I hope you are willing to talk. I want to make sure that Olivia won't be attacked by Goud during her upcoming speaking engagement with Lucid.

Here is my statement to the press:

"Over the past several months, Goud Maragani has demonstrated an unusual preoccupation with Equality Utah and several transgender women. Last year while running for county clerk, he enthusiastically sought our endorsement, which we did not grant him because he did not meet our endorsement standards.

Since then, he has been erratically tweeting about us to grossly distort our work and mission. In reality, we have a solid track record of successfully working with

elected leaders from across the political spectrum to find common ground in Utah. We hold no ill-will toward Goud. We just don't see his mean-spirited, troll-like behavior as a serious way to debate ideas and advocate for good public policy. We make more friends when we build people up, instead of tearing others down.

I hope to hear from you.

Troy

34. Ms. Judd responded to Mr. Williams, acknowledging his complaint and apologizing for her slow response.

35. Mr. Williams then responded:

Hey all,

The story dropped:

<https://www.sltrib.com/news/politics/2023/08/07/goud-maragani-wants-censure-aimee/>

36. Ms. Judd thanked Mr. Williams for his correspondence.

37. On the same day, Ms. Frisbie and Ms. Judd scheduled a meeting with Mr. Maragani.

38. During that meeting, Ms. Frisbie and Ms. Judd asked Mr. Maragani to give assurances that he would not attack the anticipated Equality Utah speaker. He was also told not to post about Equality Utah on social media.

39. During that meeting, Mr. Maragani pointed out that his posts were outside his work hours. Ms. Frisbie and Ms. Judd agreed that Mr. Maragani does a good job of keeping his political activities separate from his employment.

40. During the meeting, Ms. Frisbie stated that she was concerned that Mr. Williams could find Mr. Maragani's use of the #mascaratroy hashtag offensive.

41. During that meeting, after her communications with Equality Utah and Mr. Williams, and in response to Mr. Maragani noting that as a gay, racial minority, male, who is a veteran, he is an example of what DEI purports to promote, Ms. Judd said that she found it "confusing that



Mr. Maragani would not work with Equality Utah,” reflecting a confusion of Mr. Maragani’s identity with his political and religious beliefs.

42. On August 8, 2023, Mr. Maragani emailed Ms. Frisbie and Ms. Judd to memorialize conclusions from the conversation:

Thank you for the discussion yesterday.

I did not realize that our company’s leadership thinks my social media posts done on my personal social media accounts and outside of work hours violate Lucid’s values and our Social Media Policy.

I want to memorialize our conversation to make sure I remember it correctly and understand what is expected of me going forward. You stated that:

Troy Williams of Equality Utah emailed Lucid and asked whether we have an inclusive environment, and Troy wanted assurances that I would not harass Olivia Jaramillo when she comes to speak at Lucid on Friday.

I do a good job of keeping my employment at Lucid separate from my political activity. However, Troy’s email indicates my political activity is causing damage to Lucid’s reputation as an inclusive workplace, and

You are concerned that the hashtag #mascaratroy is offensive to Troy.

I assured you I would never harass anyone and certainly would not harass Olivia.

In addition, you stated or implied that I should not post about Equality Utah on social media if I want to keep my job.

I should not post on social media about Troy Williams of Equality Utah if I want to keep my job.

You gave me a verbal warning and indicated that continued social media activity that our company’s leadership views as a violation of Lucid’s values and/or Social Media Policy could lead to termination.

Please let me know if I missed anything or misunderstood something that was said.

Also, it would be good to have another conversation because I am not sure I fully understand the expectations.

For example, What happens if another organization complains about my social media posts?

Am I allowed to respond when Equality Utah, Troy, or others post about me on social media? Here is an example from yesterday:



**Troy Williams** @TroyWilliamsUT · 6h ...

I make it a rule not to respond to trolls online. They are not serious political players. This story -- and his behavior -- speaks for itself.

[@SchottHappens](#)



sltrib.com

Goud Maragani wants to censure Aimee Winder Newton for associating with Equ...



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I look forward to continuing this conversation. Thanks.

Goud P. Maragani

Director of Legal, Compliance, and Litigation.

43. While Mr. Maragani’s discussions continued with Ms. Judd and Ms. Frisbie, he determined that in order to save his job, he would suspend some of his speech until the matter could be determined.

44. In April of 2023, as background, Mr. Williams tweeted about Mr. Maragani calling him a “troll” and saying that “This story – and his [Mr. Maragani’s] behavior – speaks for itself.” In the article, Mr. Williams states that Mr. Maragani “has demonstrated an unusual preoccupation with Equality Utah and several transgender women.”



**Troy Williams** @TroyWilliamsUT · 6h

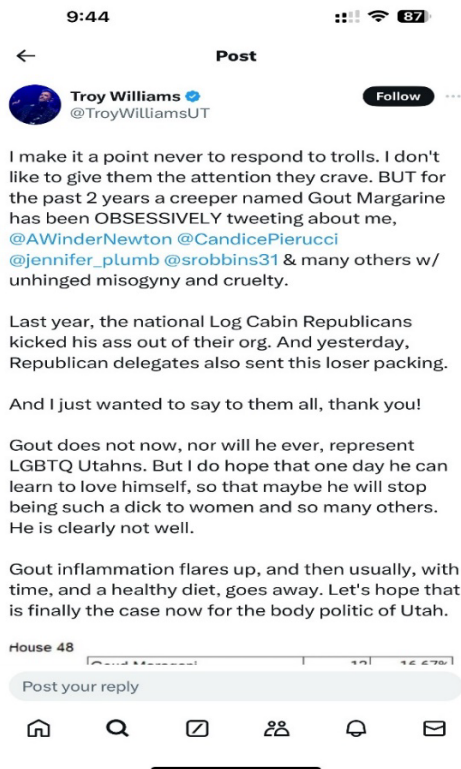
I make it a rule not to respond to trolls online. They are not serious political players. This story -- and his behavior -- speaks for itself. [@SchottHappens](#)



sltrib.com  
Goud Maragani wants to censure Aimee Winder Newton for associating with Equ...

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45. By way of context, in a tweet from April 14, 2024, Mr. Williams posted that Mr. Maragani is “not well,” and “such a dick,” as well as analogizing him to “Gout inflammation” that “goes away.”



46. On August 9, 2023, Ms. Frisbie responded via email to Mr. Maragani, in which she highlighted that Troy Williams emailed Kat, to make Lucid aware of what he described as “disturbing behavior” by Goud Maragani toward Equality Utah and expressed concern that he may begin to attack a transgender speaker that Lucid has scheduled for Friday, August 11. He asked for assurances that the speaker “won’t be attacked by Goud during her upcoming speaking engagement with Lucid.”

47. In that email, Ms. Frisbie also wrote, “You gave us these assurances, and we appreciate that. Dave Grow was separately approached by an Equality Utah board member who also expressed concerns, but Kat and I weren’t privy to that conversation and therefore can’t confirm exactly what was said.”

48. Ms. Frisbie further claimed that “[w]e requested that you cease activities that are in direct conflict with Lucid’s essential business-related interests and in violation of our social media policy. You may not have realized how fully Lucid supports Equality Utah. We are a Certified Business Equality Leader through Equality Utah, we partner with Equality Utah to deliver DEI training to our employees, and we provide money to sponsor them. We realize value as a business from this relationship. We believe you know how strongly Lucid is committed to diversity, equity and inclusion to be able to recruit and retain a diverse workforce, succeed as a global software company, and meet the requirements of a federal contractor.”

49. On August 10, 2024, Ms. Frisbie completed Mr. Maragani’s FY24 Mid-Year Review Performance review.

50. On August 22, 2023, Ms. Frisbie shared the FY24 Mid-Year Review Performance review with Mr. Maragani.

51. The mid-term review was highly negative and significantly changed from previous reviews that Mr. Maragani had received. In contrast, an earlier review from Ms. Frisbie had led him to be promoted to Director in the Office of General Counsel.

52. On August 23, 2023, after receiving the negative review, Mr. Maragani wrote Ms. Frisbie, giving her additional background, research, and information on Utah's anti-discrimination law regarding employee protected speech in and out of the workplace, Utah Code § 34A-5-112, a statute with which Equality Utah was heavily involved when it was legislated.

53. On September 25, 2023, Lucid laid off 75 people. Those employees were given ten weeks of severance plus one (1) additional week for every year of employment at Lucid, health coverage until the end of the calendar year, and free laptop computers.

54. On September 26, 2023, Mr. Williams, from his Equality Utah email, wrote a long email full of accusations to both Ms. Judd and Ms. Frisbie at Lucid, claiming that "Goud is escalating his attacks" and "hate crimes are escalating," alleging that Mr. Maragani was telling "heinous lies" and that his rhetoric is "endangering the lives of people within our community" and connecting a "bomb threat" to Goud's statements:

I'm sad to report that Goud is escalating his attacks against Sue Robbins from Equality Utah's transgender advisory board, as well as Senator Jenn Plumb, who has a transgender daughter. He is using his Log Cabin Republicans account, but as you will see from the tweets below, he is public about being the person handling that account.

If you saw KSL today, hate crimes are escalating against LGBTQ people in Utah - specifically around transgender people. A bomb threat shut down a drag event over the weekend. <https://www.deseret.com/utah/2023/9/25/23889540/hate-crimes-rising-in-utah-lgbtq-kings-english-bomb-threat>

Goud has been perpetuating the gross and heinous lie that trans people are grooming children. This kind of rhetoric is endangering the lives of people within our community.

I am not asking you to fire him. I'm just making you aware of his ongoing actions. I'm also talking with the national Log Cabin Republicans tomorrow.

Evidence that Goud is tweeting thru LCR



55. Mr. Williams included additional tweets in his email:







[Troy Williams continues,] “His new attack on Councilmember Winder Newton and a veiled lie about Equality Utah.”



[Troy Williams continues,] “Latest attacks on Sue Robbins and Senator Plumb for their involvement in the 40over40.”



56. On September 27, 2023, Ms. Judd responded to Mr. Williams, thanking him for the information and stating how she truly appreciates the partnership.

57. On October 10, 2023, Ms. Frisbie and Ashlyn Gagon, Associate People Business Partner, informed Mr. Maragani that his employment with Lucid was being (allegedly) terminated for performance. His last day at Lucid was October 13, 2023.

58. Mr. Maragani asked why he was not laid off during the layoff on September 25, 2023. Ms. Frisbie said it was because this was performance-related, and Lucid would not be re-filling the positions terminated that day.

59. During his exit interview, Mr. Maragani asked Ms. Frisbie what happens if a General Counsel to whom he is applying for a job asks her about him, as she and Ms. Judd are well connected to attorneys in Utah. Ms. Frisbie said she would not say anything bad because she thinks Mr. Maragani has good skills, but this job is no longer a good fit.

60. Mr. Maragani had not been given notice that Lucid was considering terminating his position.

61. Despite the intolerance for Mr. Maragani's religious, political, and personal convictions, Lucid represents itself to prospective employees as "an inclusive environment" for "differing perspectives." LUCID SOFTWARE, INC., Careers, (last accessed February 1, 2024), (<https://lucid.co/careers>).

62. In addition to targeting Mr. Maragani's employment, Mr. Williams also targeted the organization, the Utah Log Cabin Republicans, that Mr. Maragani ran.

63. In the September 26, 2023 email that Mr. Williams sent to Ms. Frisbie and Ms. Judd, Mr. Williams stated, "I'm also talking with the national Log Cabin Republicans tomorrow [9/27/23]."

64. On October 30, 2023, after meeting with Mr. Williams, the national Log Cabin Republicans unexpectedly and without notice dissolved the Utah chapter (*i.e.*, the Utah Log Cabin Republicans).

## **CLAIMS FOR RELIEF**

### **COUNT I**

#### **Defamation and False Light**

65. Plaintiff hereby incorporates by reference the allegations set forth in all the preceding paragraphs of this Complaint as though fully set forth herein.

66. Mr. Williams and Equality Utah knowingly made false and defamatory statements about Mr. Maragani to his employer and published defamatory statements on X (formerly Twitter). Mr. Williams and Equality Utah's emails, including a long email of September 26, 2023, proximately led to Mr. Maragani's termination and damaged his reputation.

67. Beginning his emails to Mr. Maragani's employer, first on August 1, 2023, in an email to Ms. Judd under the Subject Line: "*Concern about ongoing attacks from Lucid employee,*" Mr. Williams described what he called "disturbing behavior" toward Equality Utah and alleged that "I'm very worried that his extreme transphobic rhetoric may also endanger transgender people throughout the state." He asked for assurances that an Equality Utah representative scheduled to speak at Lucid on August 11, 2023, would not "be attacked by Goud during his upcoming event with Lucid," clearly stating concern about physical violence despite the lack of a factual predicate for such a concern.

68. In a second email on August 1, 2023, Mr. Williams and Equality Utah sent a follow-up email to Ms. Judd:

Sorry, I forgot to include one more tweet (there are so many to choose from). Goud sent this thru his LCR account, viciously speculating that Sue Robbins, a transgender advocate who

works closely with Equality Utah, simply has a sexual fetish. Goud has been regularly advancing a “grooming” narrative to demonize transgender people and positioning them as a threat to children. These tweets put our community in danger. They are cruel, disgusting and dehumanizing.

69. On August 7, 2023, Mr. Williams, through his Equality Utah email address, sent a follow-up email to Ms. Judd:

I’m disappointed I haven’t received a response from you yet. I wanted to give you a heads up that Goud’s attacks on Equality Utah, Councilmember Aimee Winder Newton and the transgender community have escalated and will be hitting the press soon. KSL and the Salt Lake Tribune have both reached out to me for comment.

I hope you are willing to talk. I want to make sure that Olivia won’t be attacked by Goud during her upcoming speaking engagement with Lucid.

Here is my statement to the press:

“Over the past several months, Goud Maragani has demonstrated an unusual preoccupation with Equality Utah and several transgender women. Last year while running for county clerk, he enthusiastically sought our endorsement, which we did not grant him because he did not meet our endorsement standards.

Since then, he has been erratically tweeting about us to grossly distort our work and mission. In reality, we have a solid track record of successfully working with elected leaders from across the political spectrum to find common ground in Utah. We hold no ill-will toward Goud. We just don’t see his mean-spirited, troll-like behavior as a serious way to debate ideas and advocate for good public policy. We make more friends when we build people up, instead of tearing others down.

I hope to hear from you.

Troy

70. Ms. Frisbie disclosed these facts in an email she sent to Mr. Maragani on August 9, 2023, and during the meeting with Mr. Maragani on August 8, 2023.

71. Ms. Frisbie’s August 9, 2023 email affirmed that Equality Utah needed assurance that Mr. Maragani would not attack their speaker.

72. That August 9, 2023 email also included that a Lucid board member had been separately approached by David Grow, a Board Member with Equality Utah, who had also expressed concerns. However, Ms. Frisbie stated, “Kat and I weren’t privy to that conversation

and therefore can't confirm exactly what was said." This further shows that Equality Utah repeatedly worked to interfere with Mr. Maragani's employment.

73. Mr. Maragani's negative review, completed on August 10, 2023, is evidence of the harm these emails did to his reputation and job.

74. On September 26, 2023, Mr. William, from his Equality Utah email, wrote to both Ms. Judd and Ms. Frisbie at Lucid, claiming that

I'm sad to report that Goud is escalating his attacks against Sue Robbins from Equality Utah's transgender advisory board, as well as Senator Jenn Plumb, who has a transgender daughter. He is using his Log Cabin Republicans account, but as you will see from the tweets below, he is public about being the person handling that account.

If you saw KSL today, hate crimes are escalating against LGBTQ people in Utah - specifically around transgender people. A bomb threat shut down a drag event over the weekend.

<https://www.deseret.com/utah/2023/9/25/23889540/hate-crimes-rising-in-utah-lgbtq-kings-english-bomb-threat>

Goud has been perpetuating the gross and heinous lie that trans people are grooming children. This kind of rhetoric is endangering the lives of people within our community.

I am not asking you to fire him; I'm just making you aware of his ongoing actions. Tomorrow, I'm also talking with the national Log Cabin Republicans.

75. Mr. Maragani's tweet that Mr. Williams called a "new attack on Councilmember Winder Newton and a veiled lie about Equality Utah" is policy-based, included in the September 26, 2023 email, and states,

Not sure I would trust @AWinderNewton to make policies about children when she has the support of left-wing, anti-family organizations that support trans-ing children, giving kids pornographic books in school, allowing boys into girls locker rooms, etc. @Govcox #utpol (which stands for Utah politics).

76. The September 26, 2023, email from Mr. Williams to Mr. Maragani's employer falsely connects tweets from the Utah Log Cabin Republicans to "hate crimes" in Utah. It includes falsely

calling Mr. Maragani's policy-based tweet "rhetoric [that] is endangering the lives of people within our community."

77. This September 26, 2023 email further falsely states that "Goud is escalating his attacks," which again implies physical violence and falsely connected him to "a bomb threat," when the Utah Log Cabin Republicans have the First Amendment right to post disagreement on policy positions.

78. Defendants also tweeted about Mr. Maragani, publishing statements that included Goud Maragani being a "troll," "not well," and "such a dick," as well as analogizing him to "Gout inflammation."

79. Mr. Maragani was not laid off on September 25, 2023, with the large layoff at Lucid, but instead, was terminated within days of the Defendants' email of September 26, 2023, which serves as evidence of the harm that his reputation suffered for his outside-of-work political and policy-based communications.

80. Defendants portrayed Mr. Maragani in a false light to his employer, making highly offensive allegations, including that Defendants asked for assurances that their speaker "won't be attacked by Goud during her upcoming speaking engagement with Lucid" and that his tweets led to "hate crimes" including a bomb threat.

81. As a direct and proximate result of these false and defamatory statements by Mr. Williams, Equality Utah, and their supporters who republished those statements, Mr. Maragani has suffered damages, including inter alia, injury to his reputation, loss of his job, harm to his ability to carry on his profession, embarrassment, humiliation, and emotional distress, in an amount to be determined at trial.

82. Mr. Williams and Equality Utah's actions were negligent, malicious, willful, and wanton, and evidenced a purposeful disregard for Mr. Maragani's constitutional and statutory employee speech rights to speak about a policy he disagreed with in his role as President of the Log Cabin Republicans, and as a Republican on the State Committee, all positions he held outside of his employment, and known to his employer.

83. Instead, Mr. Williams defamed Mr. Maragani and portrayed him in a false light to his employer, harming his reputation and employment.

84. The tortious actions were within Mr. William's role as an Executive Director for Equality Utah. They were expressly or impliedly authorized by Equality Utah or motivated by Mr. Williams' purpose to serve Equality Utah's interests.

## **Count II**

### **Tortious Interferences with Prospective Economic Advantage**

85. Plaintiff hereby incorporates by reference the allegations set forth in all the preceding paragraphs of this Complaint as though fully set forth herein. Mr. Williams and Equality Utah knowingly made false and defamatory statements first in an email to Ms. Judd on August 1, 2023, including that "Goud has been regularly advancing a "grooming' narrative, to demonize transgender people, and positioning them as a threat to children. These tweets put our community in danger. They are cruel, disgusting and dehumanizing."

86. Defendants renewed their request for an assurance that Mr. Maragani would not attack their speaker on August 7, 2023.

87. On August 7, 2023, Ms. Judd acknowledged the correspondence.

88. The August 1, 2023, email to Mr. Maragani's employer included highly offensive language, putting Mr. Maragani in a false light, "This is just a small sample of the bile that Gould [sic] regularly posts. And while Equality Utah was at the GOP convention building bridges with

delegates, he was passing out vile, offensive, and misleading flyers about our organization. **I'm very worried that his extreme transphobic rhetoric may also endanger transgender people throughout the state.**" (August 1, 2023) (emphasis added).

89. That August 9, 2023 email from Ms. Frisbie that confirmed the need for assurance that Mr. Maragani would not attack Equality Utah's speaker also included the fact that the CEO of Lucid, Dave Grow, had been separately approached by an Equality Utah board member, who also expressed concerns, but Ms. Frisbie stated, "Kat and I weren't privy to that conversation, and therefore can't confirm exactly what was said." This further shows that Equality Utah repeatedly worked to interfere with Mr. Maragani's employment.

90. Defendants sent a long follow-up email about Mr. Maragani on September 26, 2023, to both the Vice President of Operations at Mr. Maragani's employer and to Ms. Frisbie, also his supervisor,

- a. Defendants' email of September 26, 2023, to Mr. Maragani's employer falsely connects tweets from the Utah Log Cabin Republicans and Goud Maragani to "hate crimes" in Utah and that "Goud is escalating his attacks..."
- b. In the September 26, 2023 email, Defendants labeled Mr. Maragani's policy-based tweet "rhetoric [that] is endangering the lives of people within our community" and directly connected him to "a bomb threat."

91. Defendants attacked Mr. Maragani online, calling him outrageous names, including "troll," and saying, "This story – and his [Mr. Maragani's] behavior – speaks for itself." In the article, Mr. Williams states that Mr. Maragani "has demonstrated an unusual preoccupation with Equality Utah and several transgender women."



92. Defendants specifically directed these highly offensive statements to Mr. Maragani's employer, intending to interfere with Mr. Maragani's economic relationship with his employer.

93. As a direct and proximate result of the Defendant's wrongful actions to interfere with Mr. Maragani's economic relationship with his employer, Mr. Maragani has suffered damages, including, inter alia, injury to his reputation, loss of his job, harm to his ability to carry on his profession, embarrassment, humiliation, and emotional distress, in an amount to be determined at trial.

94. The Defendants' actions were intentional, malicious, willful, and wanton and evidenced a conscious disregard for Mr. Maragani's rights.

95. Mr. Williams' tortious actions were within the scope of his role as Executive Director for Equality Utah, impliedly authorized by Equality Utah, or motivated by Mr. Williams' purpose to serve Equality Utah's political interests.

### **COUNT III**

#### **Intentional Infliction of Emotional Distress**

96. Plaintiff hereby incorporates by reference the allegations set forth in all the preceding paragraphs of this Complaint as though fully set forth herein. Mr. Williams and Equality Utah, through the actions of Mr. Williams, intentionally and knowingly engaged in a course of conduct directed at Mr. Maragani by repeatedly making false accusations and false statements to Mr. Maragani's employer and online about Mr. Maragani so that he could force Mr. Maragani, in his own words, to be like "Gout" that "goes away," actions that would cause a reasonable person to suffer emotional distress. These outrageous and intolerable actions offended the generally accepted standards of decency and morality.

### **V. DEMAND FOR RELIEF**

WHEREFORE, Plaintiff Goud Maragani respectfully requests that the Court enter an Order against Troy Williams, Equality Utah, and the Equality Utah Foundation:

- a. Awarding Plaintiff Goud Maragani damages, including any presumed, actual, and/or compensatory, in an amount greater than \$300,000.00, or in such amount as proven at trial;
- b. Awarding Plaintiff Goud Maragani punitive damages;
- c. Awarding Plaintiff Goud Maragani his costs, including attorney fees arising from this action, including any appeals; and
- d. Award such other and further relief as may be just and appropriate.

**JURY DEMAND**

Plaintiff Goud Maragani hereby demands a Trial by Jury on all matters for which a Jury trial is permitted or allowed under applicable law.

Dated this 7th day of August, 2024

*/s/ Tanner J. Bean* \_\_\_\_\_

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