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IN THE SUPERIOR COURT OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

JoBeth Palmer on behalf of her son,
Kaleb Williams,

Plaintiff,

v.

Mason Lander and his parents/guardians,
Jamie Lander and Theodore Lander;
Jacob Meisner, and his
parents/guardians, Wendi Meisner and
Anthony Meisner; Taylor Sherman, a
single adult; Christopher Fantastic, a
single adult; Jacob Pennington, a single
adult; and Does 1-100,

Defendants.

No. CV2024-050586

FIRST AMENDED COMPLAINT

Civil Conspiracy; Assault and Battery

No responsive pleadings having yet been filed, Plaintiff submits this First Amended Complaint.

Introduction

1. For seven months beginning in May of 2023, for no reason whatsoever, then 16-year old Kaleb Williams was threatened, attacked, and chased in a car at high speeds by a group including Defendant Mason Lander, Defendant Jacob Meisner, Defendant

1 Taylor Sherman, Defendant Christopher Fantastic, and Defendant Jacob Pennington.

2 2. Kaleb had and has lived in the Gilbert area for a decade, he is a good student,
3 and he has many close friends. He has interacted with some of these Defendants over the
4 years in public school and until May of 2023 he never had a cross word with any of them.
5 In fact, he considered himself close friends with one of the Defendants just a few years
6 prior to the filing of this Complaint.

7 3. That changed on May 29, 2023, when he was attacked at a park in Mesa and
8 then subject to continued threats and harassment for more than six months.

9 4. The threats and harassment only stopped when one of the Defendants was
10 incarcerated for his role in the attack.

11 5. This group of Defendants is part of a larger group that calls itself the "Gilbert
12 Goons."

13 6. The Gilbert Goons conspired to attack and otherwise victimize local
14 teenagers like Kaleb and share the videos on social media.

15 7. In this Complaint, JoBeth and Kaleb choose to sue only those within the
16 Gilbert Goons who threatened and attacked him directly but reserve the right to amend
17 this Complaint to add other conspirators should circumstances warrant.

18 **Parties, Jurisdiction and Venue**

19 8. Plaintiff JoBeth Palmer is the mother of Kaleb Williams, a minor.

20 9. Upon information and belief, each of the Defendants listed herein are
21 residents of Maricopa County or Pinal County.

22 10. The following is a list of Defendants believed to be minors at times relevant
23 to this Complaint, and their parents/guardians:

24 a. Mason Lander: Jamie Lander and Theodore Lander;

25 b. Jacob Meisner: Wendi Meisner and Anthony Meisner;

26 11. Defendant Sherman, Defendant Fantastic and Defendant Pennington are
believed to have been adults at all times relevant to this Complaint.

1 12. Does 1-100 are unidentified persons who are responsible for some or all of
2 Kaleb’s injuries.

3 13. All Defendants caused events to occur in Maricopa County which give rise
4 to this lawsuit.

5 14. Jurisdiction and Venue in this Court are appropriate.

6 15. The undersigned certifies this case qualifies as “Tier 2” pursuant to Ariz. R.
7 Civ. Proc. 26.2.

8 **Facts of the Case**

9 16. Kaleb is a bright, funny, engaging 17-year-old with a loving family and
10 many friends. He has been a student in the Higley Unified School District since
11 elementary school.

12 17. On May 29, 2023, Kaleb and a friend saw an invitation to a teenage party
13 at a park in Mesa on SnapChat, and they decided to go.

14 18. Almost immediately upon arriving at the Mesa park and exiting their car, a
15 teenager that Kaleb did not know walked up and said to him, “whatever goes down I’m
16 on your side.”

17 19. Within seconds, Kaleb was surrounded.

18 20. As somebody began pushing him from the front, another person picked
19 Kaleb up from behind and slammed him into the ground.

20 21. After being slammed to the ground Kaleb was punched and kicked by
21 multiple assailants.

22 22. Kaleb’s first instinct was to curl and protect his head.

23 23. The teenagers who attacked Kaleb are members of the Gilbert Goons
24 including Jacob Meisner, Christopher Fantastic, and an unknown assailant.

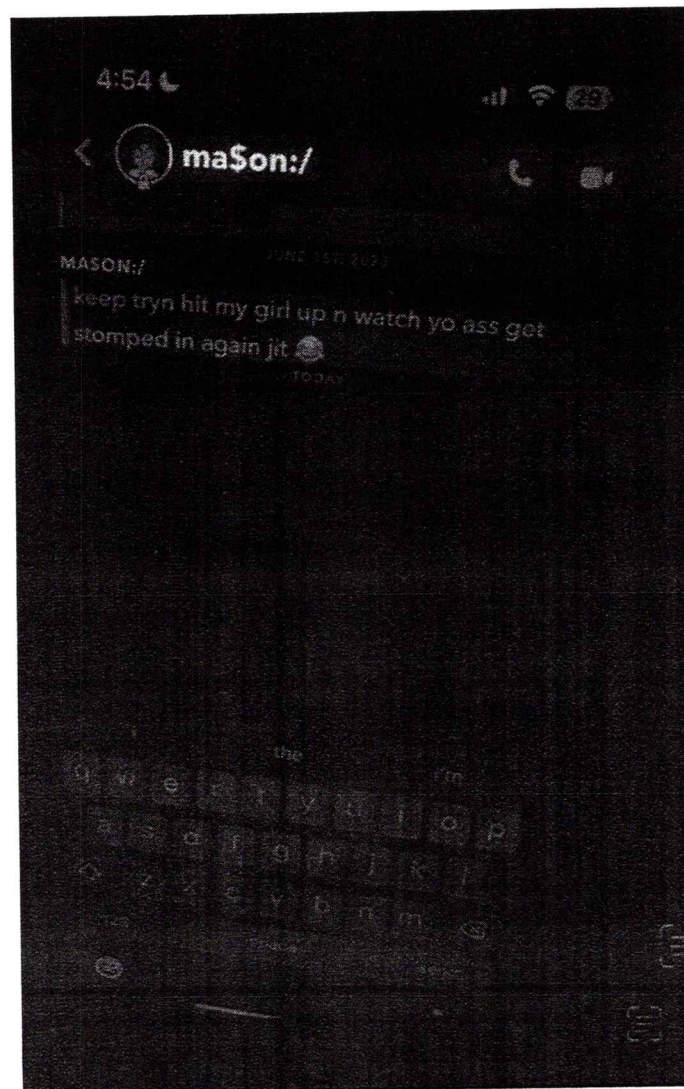
25 24. As was their custom and purpose, the Gilbert Goons recorded the beating
26 and circulated it amongst each other on social media.

25 25. A video of the attack can be found here:

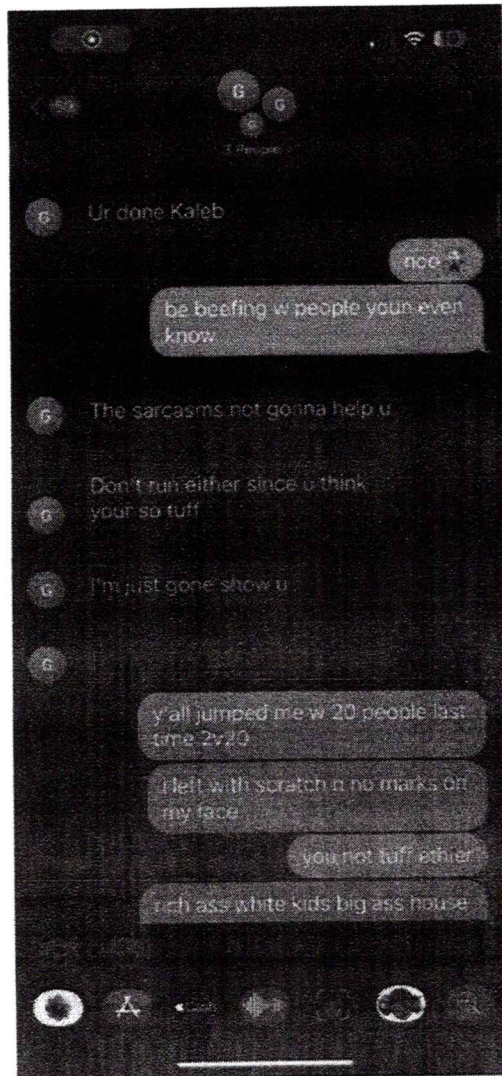
1 <https://www.dropbox.com/scl/fo/u9d7ujs5vgdfimxnlmgmf/h?rlkey=06zcvo54y9tdhh4ue>
2 [cnxi99le&dl=0](#)

3 26. Eventually, Kaleb and his friend struggled away and made it to their
4 vehicle, Kaleb losing his shoes in the process.

5 27. Several days later, Defendant Lander sent the following text, admitting he
6 set up the first attack and threatening another:



1
2 28. Kaleb would receive dozens of threatening texts from two burner phones
3 in the months that followed. These messages referenced the attack in the park and
4 threatened further violence. Kaleb saved their numbers into his phone contacts as goon 1
5 and goon 2. A typical exchange is below:



1 29. Almost exactly two months after the attack in the park, on July 28, 2023,
2 Kaleb and a friend were out driving with two girls in their vehicle.

3 30. They stopped at a convenience store, and encountered certain members of
4 the so-called Gilbert Goons, including at least one who attacked Kaleb: Defendant
5 Meisner, Defendant Pennington, and Defendant Sherman.

6 31. Kaleb and his friends drove away as quickly as they could, but two
7 Defendant vehicles gave chase, Defendant Sherman driving a truck and Defendant
8 Pennington driving a car.

9 32. The Defendant vehicles sped toward them, the occupants throwing
10 Twisted Teas, and Kaleb and his friends fled at higher and higher speeds.

11 33. The Defendant vehicles chased Kaleb and his friends at speeds far above
12 any speed limit for nearly 30 minutes.

13 34. The girls in the backseat were terrified about what would happen if they
14 were caught by these Defendants, and they were crying almost the entire time.

15 35. Kaleb was also terrified the entire time, worried that they would be caught
16 and the four of them beaten, and he tried desperately to get his father Mike on the phone.

17 36. Kaleb finally got through and Mike directed them to drive to a park where
18 Mike would confront these Defendants.

19 37. When Kaleb arrived at the park where Mike was waiting, the Defendant
20 vehicles suddenly vanished.

21 38. In the months that followed, Kaleb continued to receive disturbing and
22 threatening text messages from unknown numbers.

23 39. One such text asked him to meet at a home in the Whitewing
24 Neighborhood in Gilbert, and the text message contained the Whitewing gate code.

25 40. Kaleb's father Mike had enough so he sent his own texts to the unknown
26 goons, demanding that they stop harassing and attacking his son.

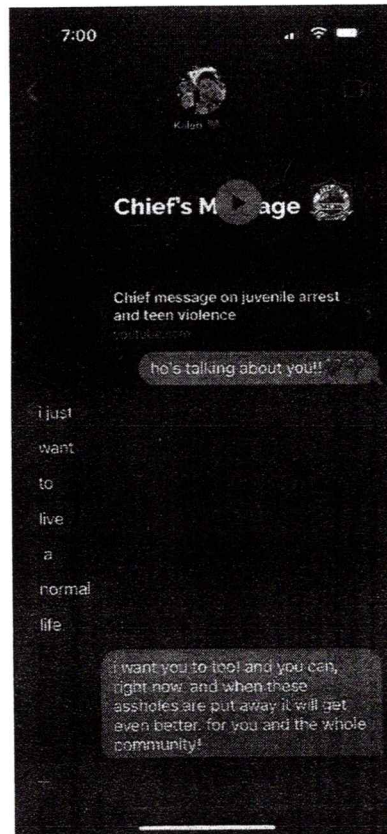
1 41. Mike received threatening texts in return, including several that referenced
2 the murder of Preston Lord.

3 42. The threatening text messages to Mike stopped in mid-December of 2023.

4 43. The threatening text messages to Kaleb stopped when Defendant Meisner
5 was arrested for the attack against Kaleb and then held without bond.

6 44. As a result of this seven-month conspiracy of harassment, threats, assault,
7 and battery, Kaleb has suffered significant physical and emotional harm.

8 45. When his assailants began to be arrested for this and other acts of violence
9 in the Gilbert area, he had the following text exchange with JoBeth:



COUNT ONE—CIVIL CONSPIRACY

1 **(against Defendant Lander, Defendant Meisner, Defendant Sherman, Defendant**
2 **Fantastic, Defendant Pennington and Does 1-100)**

3 46. JoBeth hereby reasserts all previous allegations.

4 47. Each of the named Defendants made an agreement to attack, harass and
5 intimidate Kaleb.

6 48. Each of the named Defendants made overt acts in furtherance and
7 ratification of the conspiracy.

8 49. These overt acts included the attack at the park, the threat from Defendant
9 Landers, the high-speed chase, and the continued threatening text messages from
10 unknown numbers.

11 50. As a result of the civil conspiracy of the Defendants, Kaleb suffered
12 physical and emotional injuries

13 **COUNT TWO--ASSAULT**

14 **(against Defendant Lander, Defendant Meisner, Defendant Sherman, Defendant**
15 **Fantastic, Defendant Pennington and Does 1-100)**

16 51. JoBeth hereby reasserts all previous allegations.

17 52. Defendant Lander, Defendant Meisner, Defendant Sherman, Defendant
18 Fantastic, and Defendant each committed acts of assault, threat and intimidation against
19 Kaleb, including the attack at the Mesa park, the high-speed chase, and the threatening
20 text messages.

21 53. The unknown assailant is among the Doe 1-100 Defendants.

22 54. As a result of the assault described herein, Kaleb suffered physical and
23 emotional injuries.

24 **COUNT THREE—ASSAULT AND BATTERY**

25 **(against Defendant Meisner, Defendant Fantastic and Does 1-100)**

26 55. JoBeth hereby reasserts all previous allegations.

56. On May 29, 2023, Kaleb was attacked at a party by Defendant Meisner,

1 Defendant Fantastic, and an unknown assailant.

2 57. Kaleb was completely innocent, having done nothing whatsoever to
3 provoke the attack.

4 58. This attack was planned before Kaleb ever arrived.

5 59. As a result of the assault and battery described herein, Kaleb suffered
6 physical and emotional injuries

7 **COUNT FOUR—INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

8 **(against Defendant Meisner, Defendant Pennington, Defendant Fantastic,
9 Defendant Lander, Defendant Sherman and Does 1-100)**

10 60. Jobeth hereby reasserts all previous allegations.

11 61. The conduct described above, including violence, threats, intimidation, and
12 is extreme and outrageous by community standards.

13 62. By engaging in threats, intimidation, and assault and battery, Defendant
14 Meisner, Defendant Pennington, Defendant Fantastic, Defendant Sherman and
15 Defendant Lander engaged in conduct they knew or should have known would cause
16 Kaleb emotional distress.

17 63. By circulating a video of the attack on social media, these Defendants
18 further intended and did cause Kaleb emotional distress.

19 64. As a result of their conduct as described herein, Kaleb suffered emotional
20 injuries

21 **COUNT FIVE—STATUTORY LIABILITY**

22 **(against each of the parents of minors identified herein)**

23 65. Kaleb hereby reasserts all previous allegations.

24 66. Under Arizona law, parents and guardians are liable for the willful or
25 malicious conduct of their minor children pursuant to A.R.S. § 12-661

26 67. Under Arizona law, parents and guardians are jointly and severally liable
for the first \$10,000 of actual harm suffered due to their minor child's willful or

1 malicious conduct, for each separate tort.

2 68. By engaging in threats, intimidation, and assault and battery as alleged
3 herein, Defendant Lander and Defendant Meisner engaged in willful and malicious
4 misconduct.

5 69. Each set of parents as listed herein is jointly and severally liable for every
6 one of the separate torts committed by their minor children including civil conspiracy.

7 70. Each set of parents as listed herein is financially responsible for the first
8 \$10,000 of actual damages resulting from every separate act of civil conspiracy,
9 intimidation, threat, and attack on Kaleb.

10 **COUNT SIX—NEGLIGENT SUPERVISION**

11 **(against each of the parents of the minors**
12 **identified herein)**

13 71. JoBeth hereby reasserts all previous allegations.

14 72. For several years, Defendant Lander and Defendant Meisner were among a
15 group engaging in a terror campaign against unsuspecting teenagers in the area.

16 73. This group was and is known as the “Gilbert Goons” and they publicized
17 their misconduct on social media.

18 74. Any reasonable degree of parental supervision would have informed the
19 parents of these minor Defendants of this terror campaign.

20 75. The parents of Defendant Lander and Defendant Meisner were negligent in
21 the supervision and parenting of their minor children.

22 76. If the parents of these minors had acted reasonably, the threats,
23 intimidation, and attack on Kaleb never would have occurred.

24 77. Each of the parents of the minor Defendants as listed herein are jointly and
25 severally liable for the damages their minor children caused to Kaleb.

26 78. As a result of the negligent parenting and supervision of their minor
children conduct as described herein, Kaleb suffered physical and emotional injuries.

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PRAYER FOR RELIEF

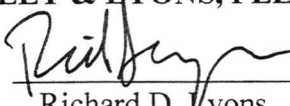
WHEREFORE, JoBeth prays for relief against all named and unnamed Defendants as follows:

- A. For general damages against each Defendant, jointly and severally, to Kaleb for his physical and emotional injuries;
- B. For punitive and exemplary damages against each of these Defendants for the assault and battery, their threats and attempts at intimidation, and the high-speed car chase, to be applied and paid jointly and severally, in amounts appropriate to adequately punish them and deter others from engaging in similar misconduct;
- C. For statutory compensation against each parent of each minor, jointly severally, pursuant to A.R.S. 12-661;
- D. For prejudgment interest;
- E. For such other relief as the Court may deem proper.

Dated this 12th day of February, 2024.

KELLY & LYONS, PLLC

By: _____



Richard D. Lyons
Jason M. Kelly
Attorneys for Plaintiffs

ORIGINAL of the foregoing filed this 12th day of February, 2024 with:

Clerk of Superior Court
Maricopa County Superior Court