

PLAINTIFF(S) ATTORNEY INFORMATION:

Laura Owens

[REDACTED]

Scottsdale, AZ 85254

[REDACTED]

Name/Address/Phone

____ Superior Court of Arizona in Maricopa County, 201 W Jefferson St.,
Phoenix, AZ 85003____
(Court Name, Address and Phone Number)

Laura Owens

[REDACTED]

Scottsdale, AZ 85254

[REDACTED]

Plaintiff(s) Name/Address/Phone

V.

Case Number CV2021-052893

**COMPLAINT
CIVIL**

Gregory Gillespie

[REDACTED]

Scottsdale, AZ 85028

[REDACTED]

Defendant(s) Name/Address/Phone

Plaintiff(s) alleges:

1. This claim arises from: Tort Contract Debt

2. Venue in this precinct is proper because:

The defendant(s) reside(s) or does business in this precinct.

The debt or obligation that resulted in this claim occurred in this precinct
at the following location: _____

[] Other: _____ (pursuant to A.R.S. § 12-401).

3. The defendant(s) owes the sum of \$ 45,000. The defendant(s) owe the plaintiff(s) this amount because: (State the facts in support of your claim. You may attach an additional page to your complaint, if necessary.)

The Plaintiff became pregnant with the Defendant's child on either June 4) Plaintiff became pregnant on her second date with Defendant on or around June 30 2021 after only 2 dates.

5) Plaintiff informed Defendant of the pregnancy and he denied it, after which he forced Plaintiff to have multiple pregnancy tests and a doctor's appointment.

6) Once Defendant finally learned the pregnancy was real, Defendant employed false promises, and verbal and emotional abuse to coerce Plaintiff into getting an abortion.

7) Upon Plaintiff's first attempt to terminate the pregnancy, Defendant blocked Plaintiff from all communication.

8) When Plaintiff informed Defendant of her failed attempt at termination, Defendant again employed false promises, and verbal and emotional abuse to coerce Plaintiff again.

9) During this entire time, Plaintiff clearly expressed her desire to not terminate the pregnancy. (See attachment for more)

1) - ARS 13-3601

3. The victim or the defendant is pregnant by the other party.

6. The relationship between the victim and the defendant is currently or was previously a romantic or sexual relationship.

L. If a person is convicted of an offense involving domestic violence and the victim was pregnant at the time of the commission of the offense, at the time of sentencing the court shall take into consideration the fact that the victim was pregnant and may increase the sentence.

- ARS 36-2153:

G. A person shall not intimidate or coerce in any way any person to obtain an abortion.

- Intentional tort: Intentional Infliction of Emotional Distress

- The person's conduct or actions were extreme or outrageous;
- The person intended to inflict distress, or the person recklessly disregarded that their conduct would result in the victim's emotional distress; and,
- The person's conduct resulted in the victim's severe emotional distress

4. Plaintiff(s) is also claiming:

Attorney's fees

Prejudgment interest

Case Number: _____

Postjudgment interest

Court costs

Other (specify): _____

5. I state under penalty of perjury that the foregoing is true and correct.

Date: 8/10/21

Laura Owens
Plaintiff

PLAINTIFF(S) ATTORNEY INFORMATION:

Laura Owens

[REDACTED] Street Scottsdale, AZ 85254

[REDACTED]

Plaintiff(s) Name/Address/Phone

Name/Address/Phone

Superior Court of Arizona in Maricopa County, 201 W Jefferson
St., Phoenix, AZ 85003

(Court Name, Address and Phone Number)

Laura Owens

Case Number:

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Plaintiff(s) Name/Address/Phone

V.

Gregory Gillespie

[REDACTED] Scottsdale, AZ 85028

[REDACTED]

Defendant(s) Name/Address/Phone

The following pages are copies of relevant notes and text messages from July and August of 2021 between the Plaintiff and the Defendant.

12:20

5G



Document 32497265



one medical

15210 N Scottsdale Road - Suite 275 - Scottsdale, AZ 85254
ph: 888-663-6331 fax: 602-218-4076

July 16, 2021

Laura Owens, DOB:

To Whom It May Concern:

Patient was evaluated in the office today and was determined to be in early stages of pregnancy. Patient was on insecure medication that decreased the effectiveness of her oral contraceptives. Please contact our office for any further questions.

Sincerely,

John Jones, DO
NPI: 1766826796

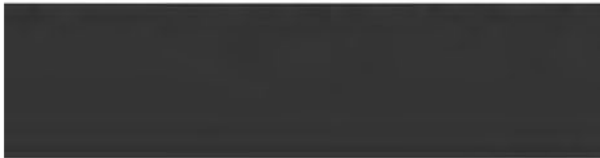


1:03

LTE



Document 32505914



one medical

John Jones, DO
15210 N Scottsdale Road Suite 275
Scottsdale, AZ 85254
p: 888-603-6331 f: 602-218-4676

Procedure Performed at One Medical

Date: Jul 15, 2021

Patient

Legal Name: Laura Owens

Goes By: Laura

Birth Date: [REDACTED]

Phone:

Is patient pregnant:

See attached for complete demographic and insurance information.

Procedure

Urine pregnancy test, 81025

Indication

Amenorrhea (ICD-10CM: N91.2)

Procedure Summary

Result: 2 lines - positive

Thank you,

John Jones
(NPI: 1760826796)
johnjones@onemedical.com



otes and records from Ms. Laura Owens visits to One Medical on 1

6:17

< 201

someone you can't trust for a week. We need to get our lives back and healthy. And then we can get to know our true selves. This is damaging both of us severally with every hour that continues to pass. I know that I liked you very much when this wasn't on our minds and over our heads. I know that it is damaging each of us. I want this to be over with. Do you? Can we take care of it this week and try for this weekend. The timing is perfect. I don't want to go into the week next week with this on our minds any longer. I should be almost healthy, this will be beyond us. Hopefully have a nice weekend going into the week and we can get back to being ourselves.

I promise this to you. I will support you after this, I will grow with you get to know our real selves and we can begin our relationship in the tight foot.

I need the same from you. To see that you support what I'm trying to do here also. Get back to healthy.



Microsoft





foundation for something more mea

Will you take the pills tonight? I don't want to have a baby this way

That would mean you can take the others tomorrow. And Friday. And by the weekend, I will be hopefully 100%, this will be past us and we can plan to go to Sedona maybe Sunday? I have PTO also, if you can get off work, we could go Sunday Monday?

I need to relax after all this. I know you do also.

And I can't with everything going on. This should have been completed this time last week.

Neither of us had handled it well. I'm sorry I got upset, I'm sorry I blacked you, I'm sorry I am sick and can't be myself at the moment.

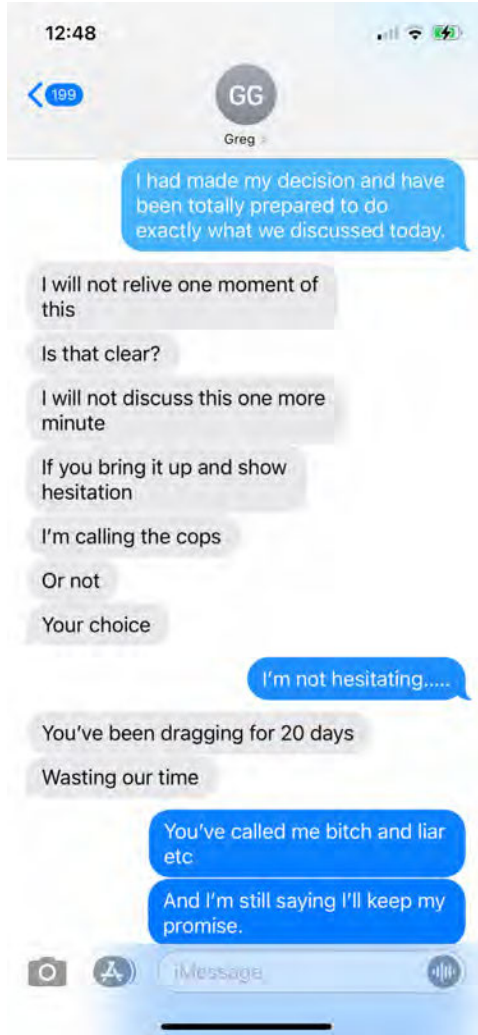
I promised you We would continue to see one another (assuming you want to?!), grow with each other, use this as a reason to be stronger and build a foundation. We moved way too fast, I said this then and I say it now. We need to get to know one another and not on this stressing

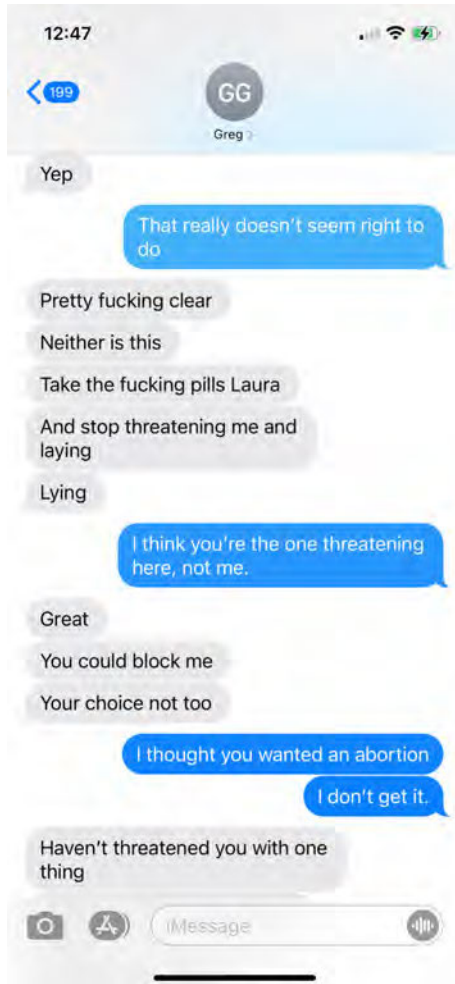
Stressor.

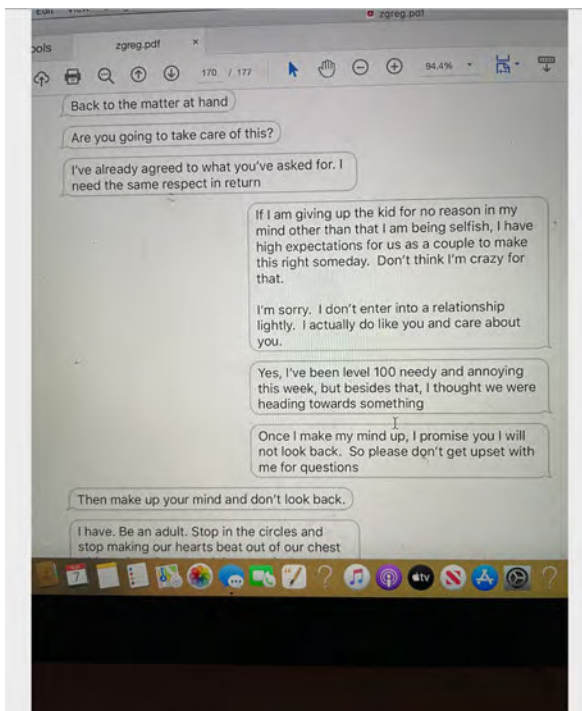
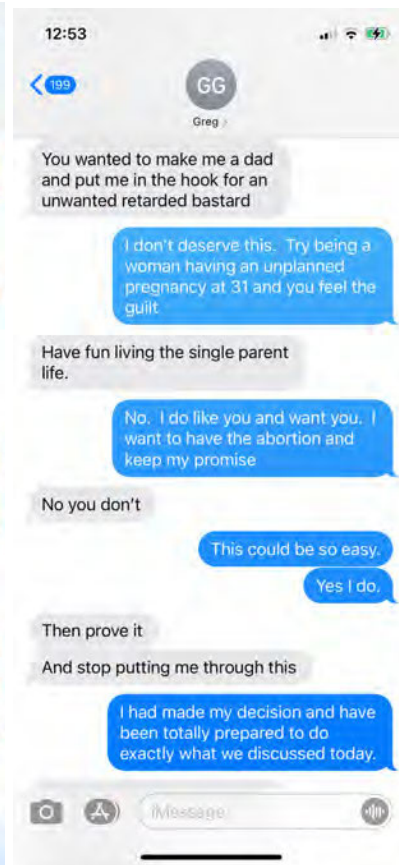
Neither one of us had been ourself. And there's no chance we will be until this is beyond us. I want to get yo know you, not this version that no normal couple would ever have to face. We haven't handled it well until now and we won't until this is behind us. We are human. We have feelings and this stressed us

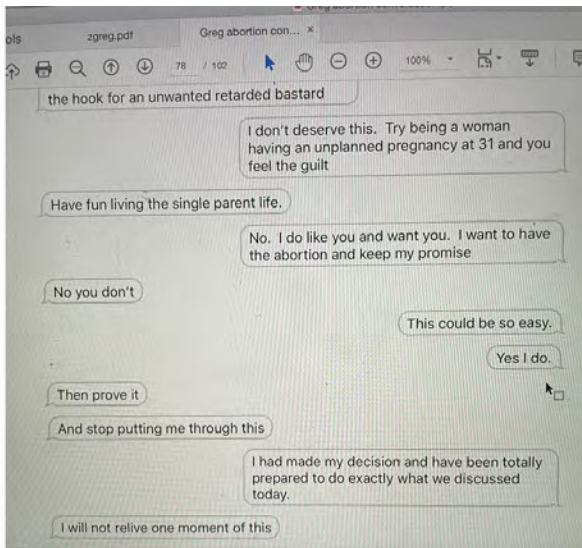
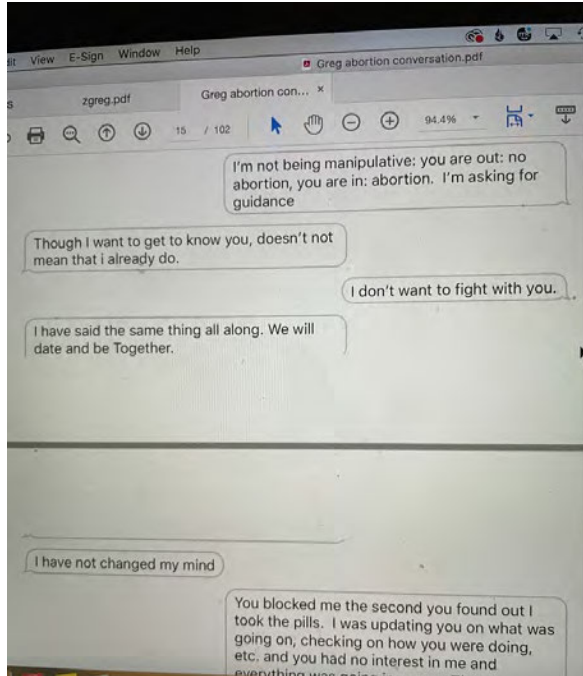
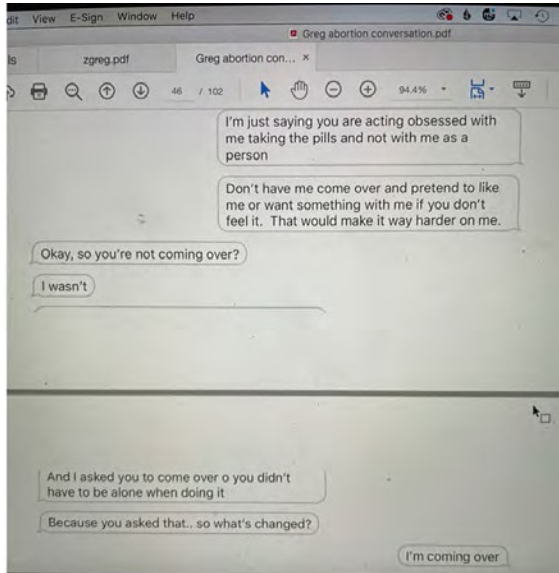
to the Max. I want to do everything I can to move past, heal get to know one another. Under "normal" circumstances. We wanted to take care of this weeks ago and not another

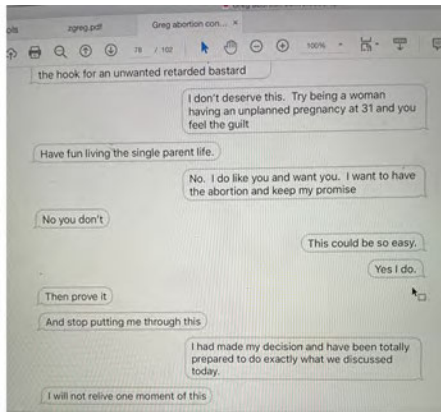
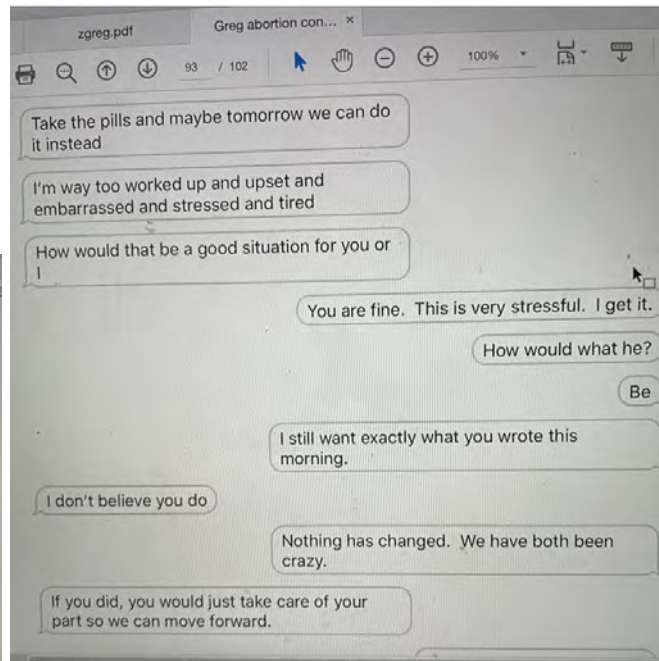
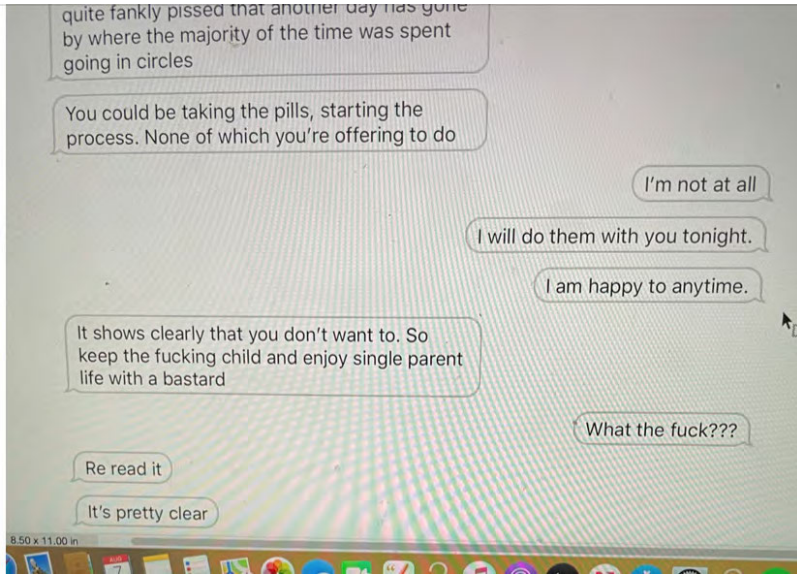
Text messages from Mr. Gillespie expressing his desire to have a relationship after Ms. Owens would have an abortion from the week of August 4, 2021

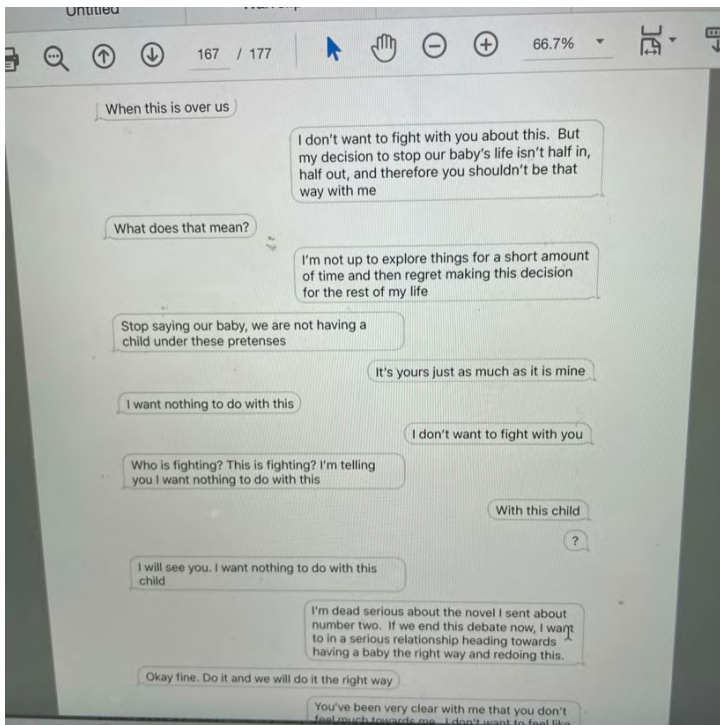
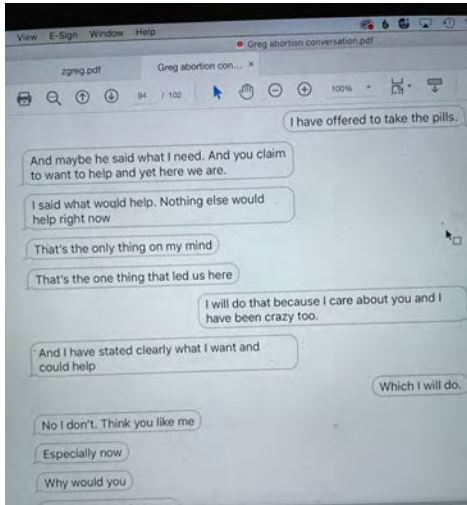


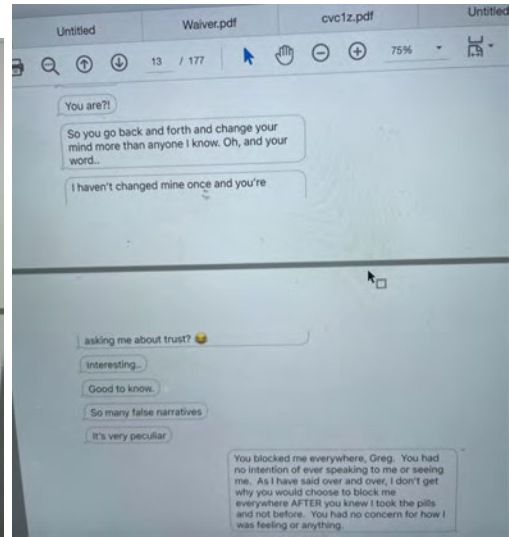
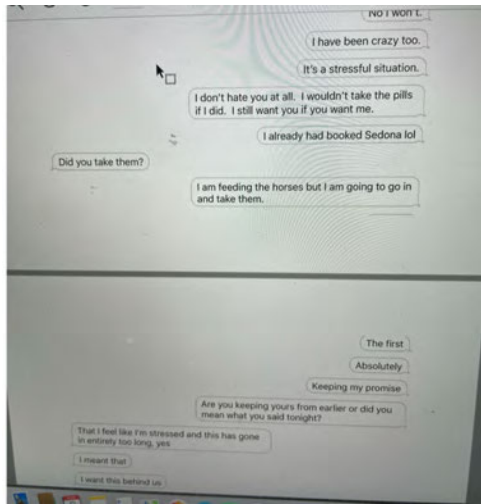
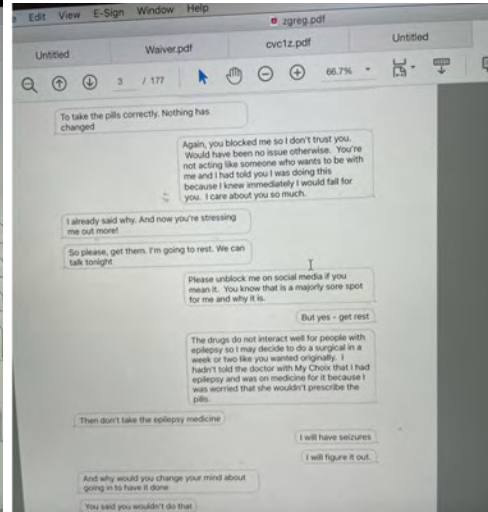
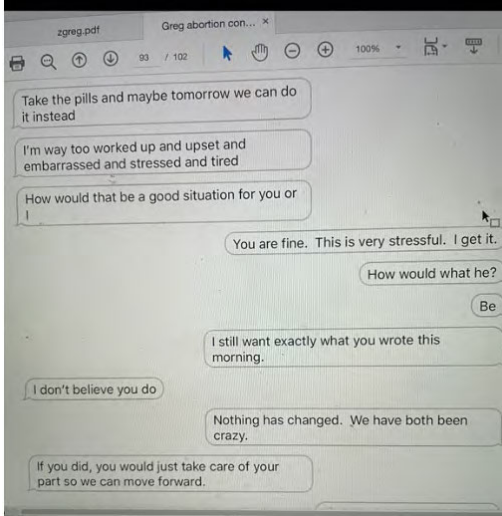


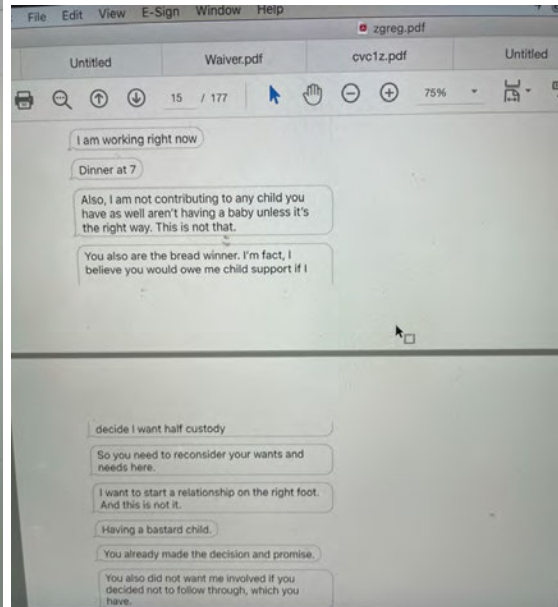
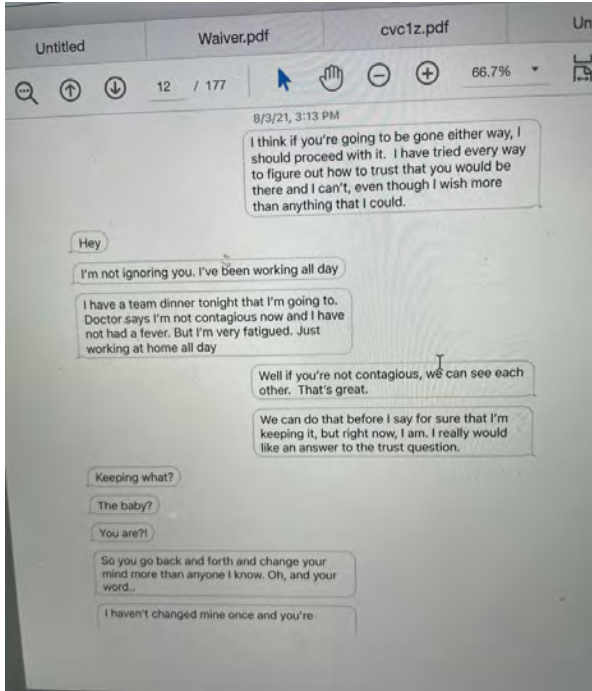


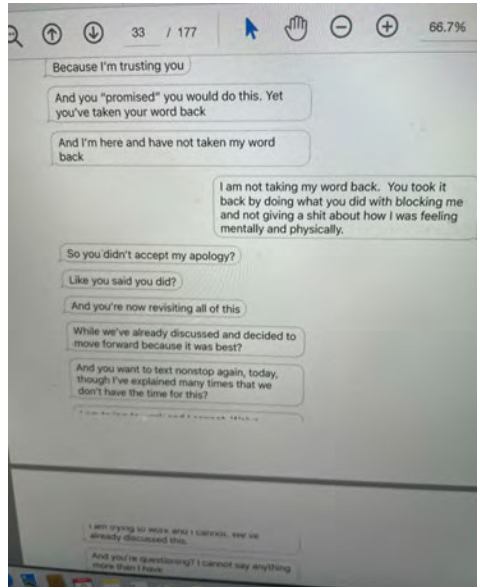
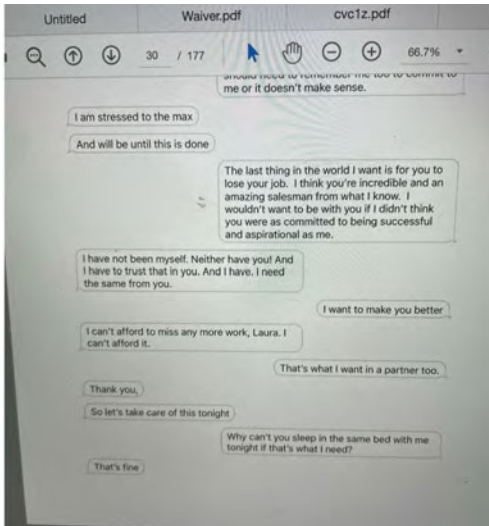
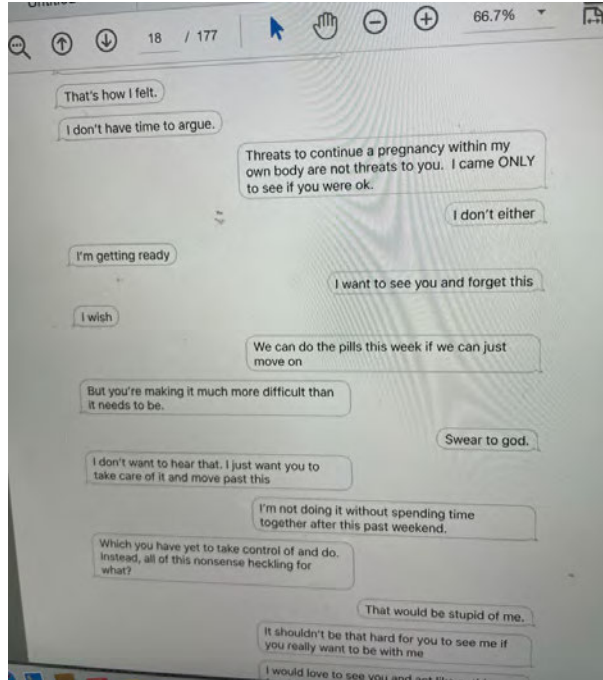
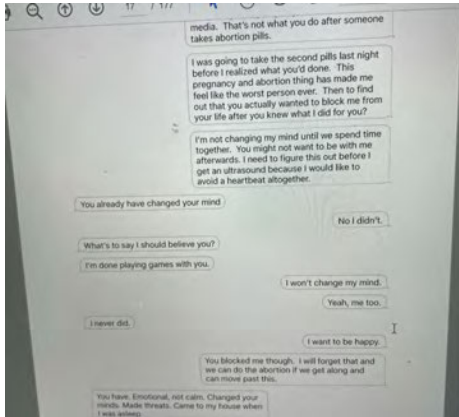












You have driven me nuts with the circles and harassing

You are a terrible person

Oh my god are you serious?

You can enjoy your bastard child and all your money in your own

Did you see what the church says about abortion??????

Yeah I'm serious. I don't give a fuck

I would keep my promise to you.

Church is a belief. One beliee.

You already lied to me on many fronts. I will never believe you

Then why do you care about a bastard child?

I have changed my mind because I have felt tortured on this

Until you fucking prove it with actions. You are all talk. Immature, child

I am ready to do that...

No no no you would

Wouldn't

Yes I would.

I can't speak another word about this

I need to work!!!

I need to get my life back

And you won't let me

We can have this done.

I wanted to tonight...

Then fucking do it

I made a promise to the guy who sent me those messages above who is clearly not who you are right now

I am not going back on the promise I made to who you seemed to be then.

And stop with the manipulation. The less the

I am ready to do that...

No no no you would

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Yes I would.

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I am not going back on the promise I made to who you seemed to be then.

And stop with the manipulation. The less the

You're the one changing your mind.

Stop fucking saying it and do it

I can't take this

You've pushed me

I can be over by 8 and do it...wtf is wrong

You

That's what's wrong

I am keeping my cool here.

You. Telling me im responsible for a bastard child

You

I don't think you'd be proud of these texts another day.

Yeah. First time. You only are bc im not.

Now you know how the fuck it feels

Thanks for nothing the last 20 days other than sickness and stress

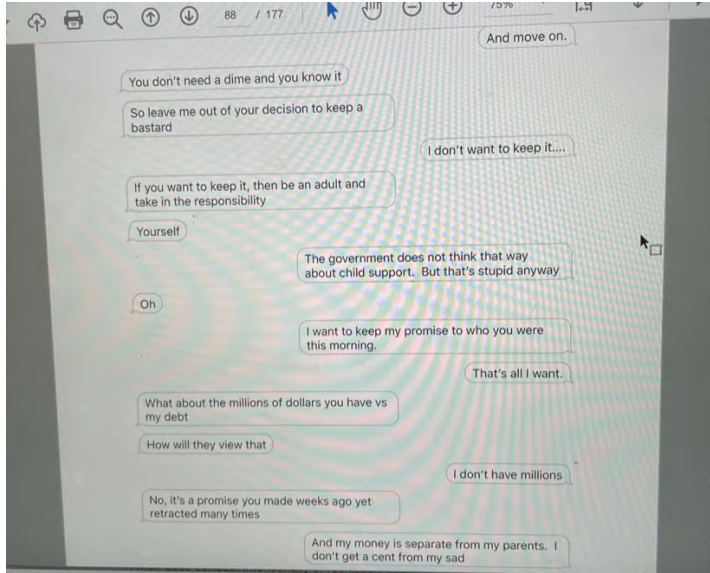
I have felt the same way going through this

Wish the roles had been reversed

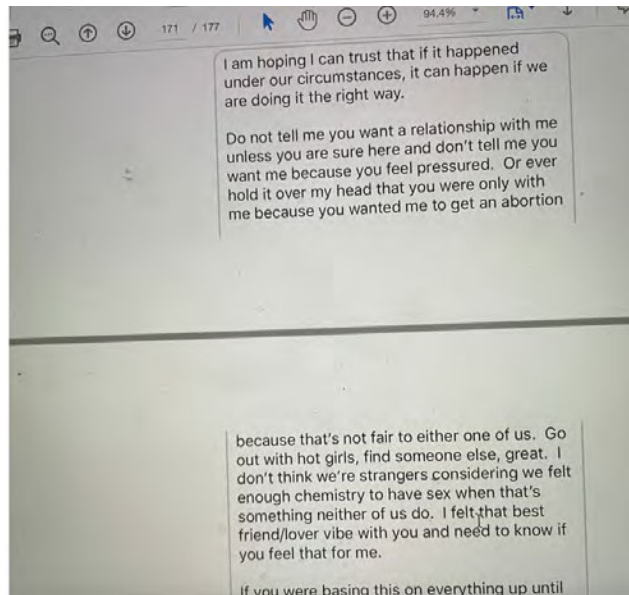
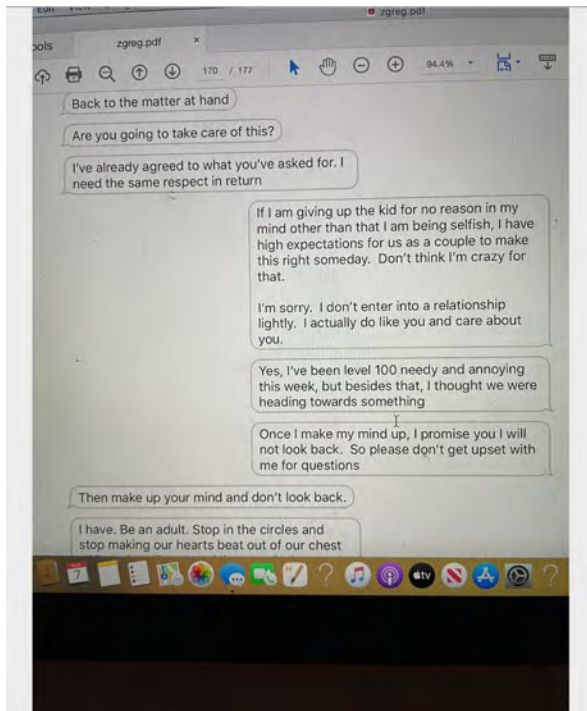
Reversed.

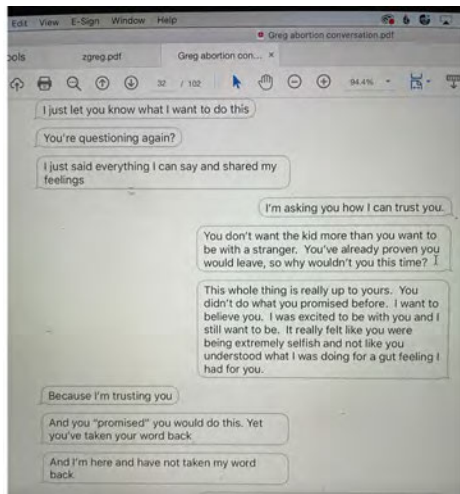
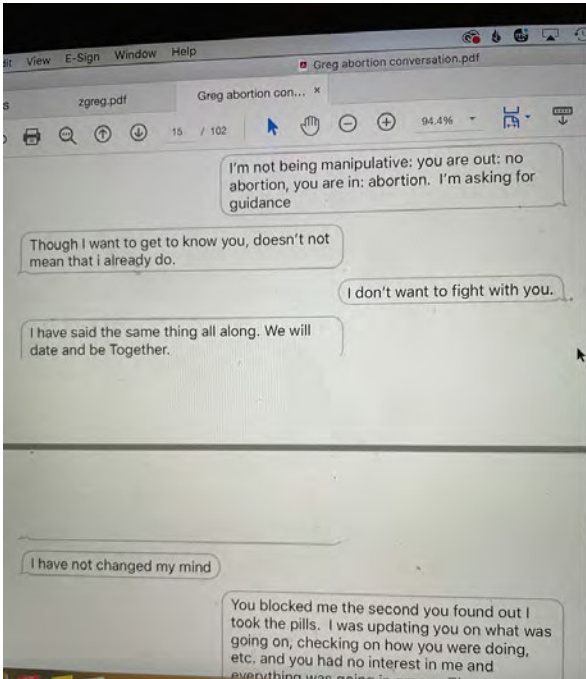
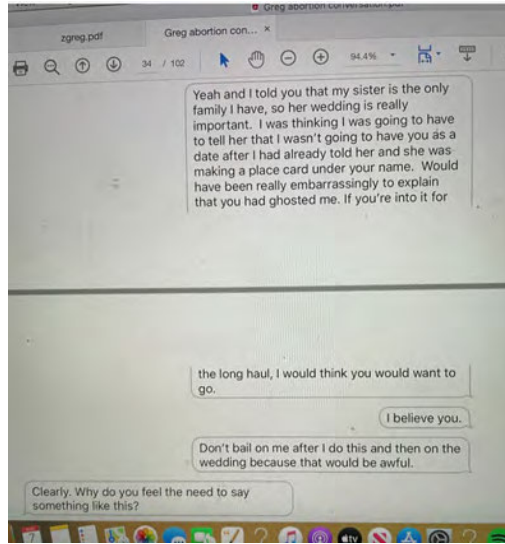
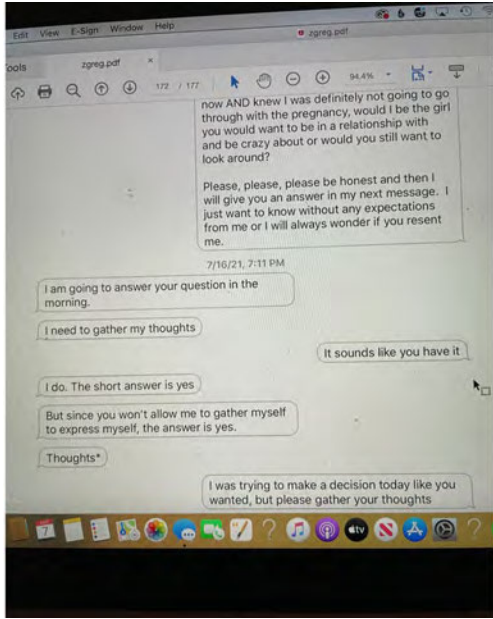
You should have taken care of it the fucking moment you found out and never told me

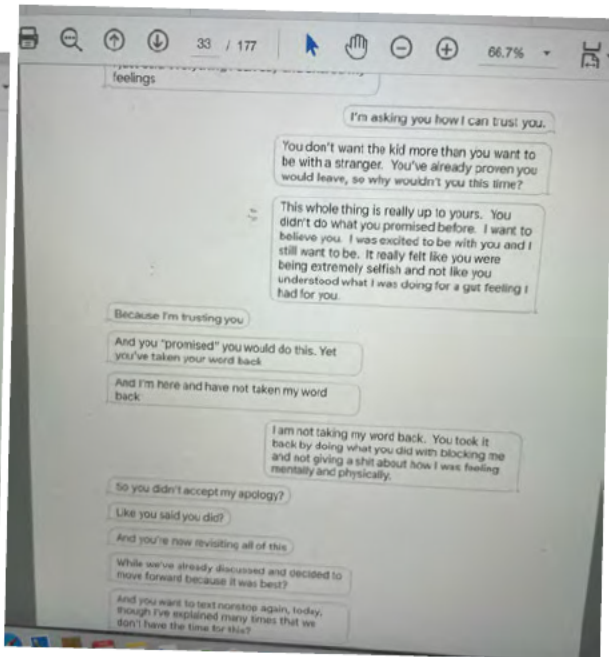
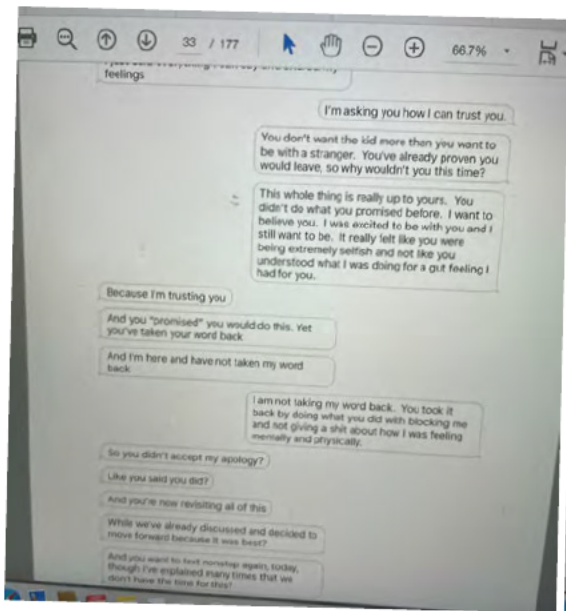
Selfish.

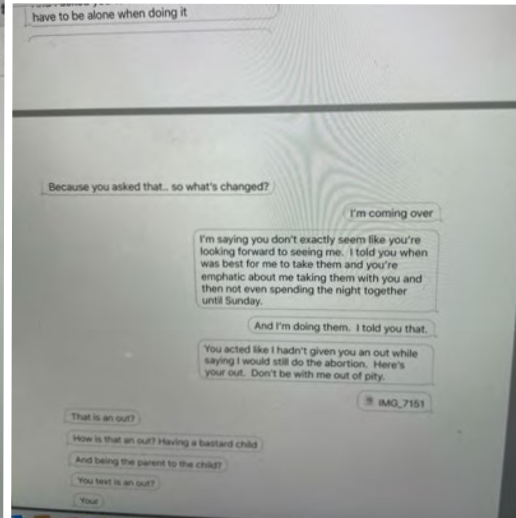
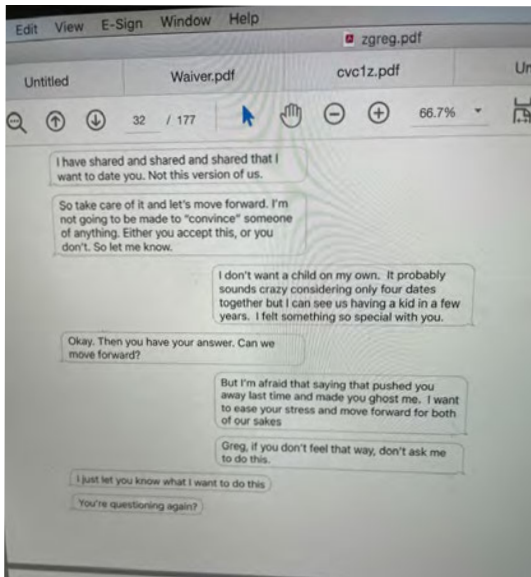
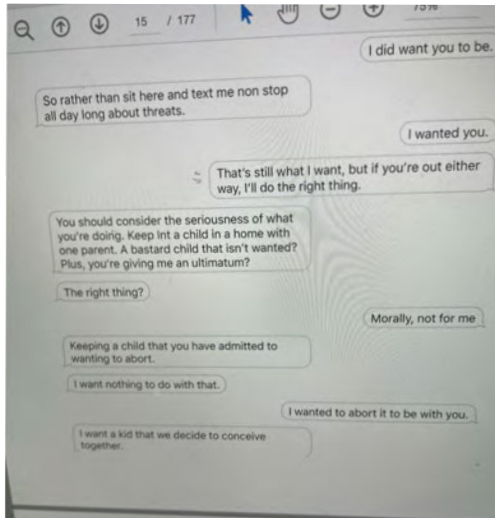
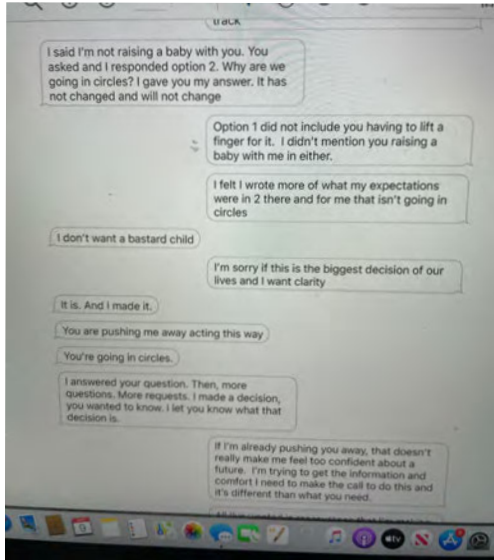


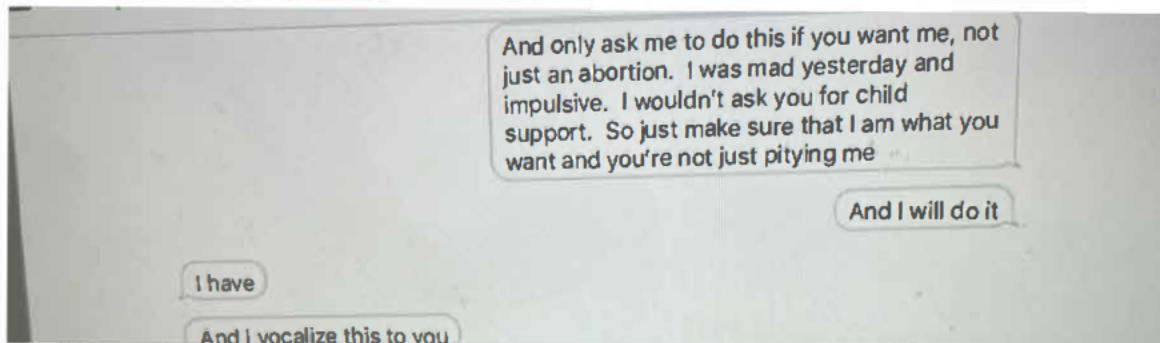
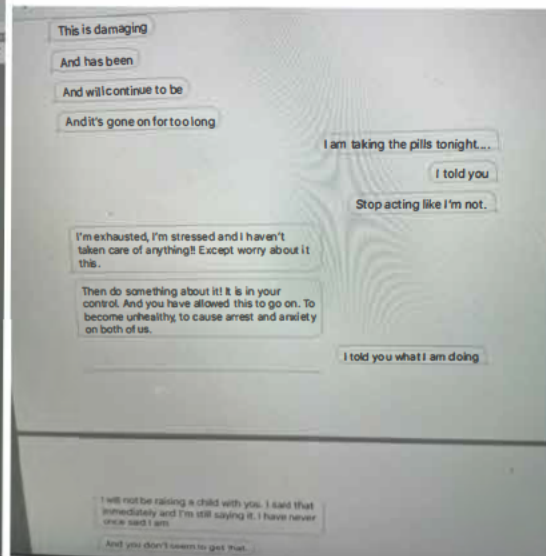
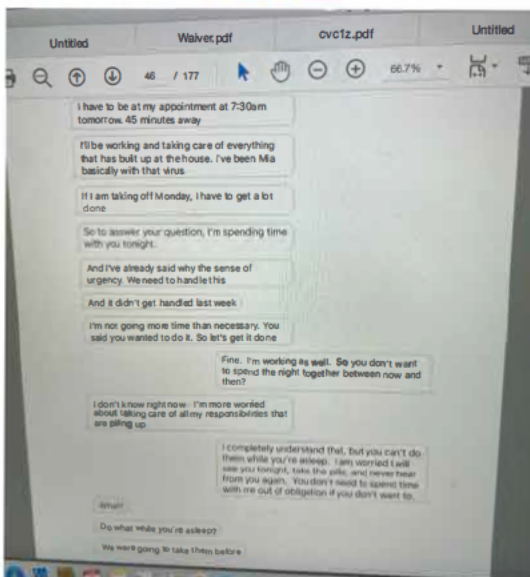
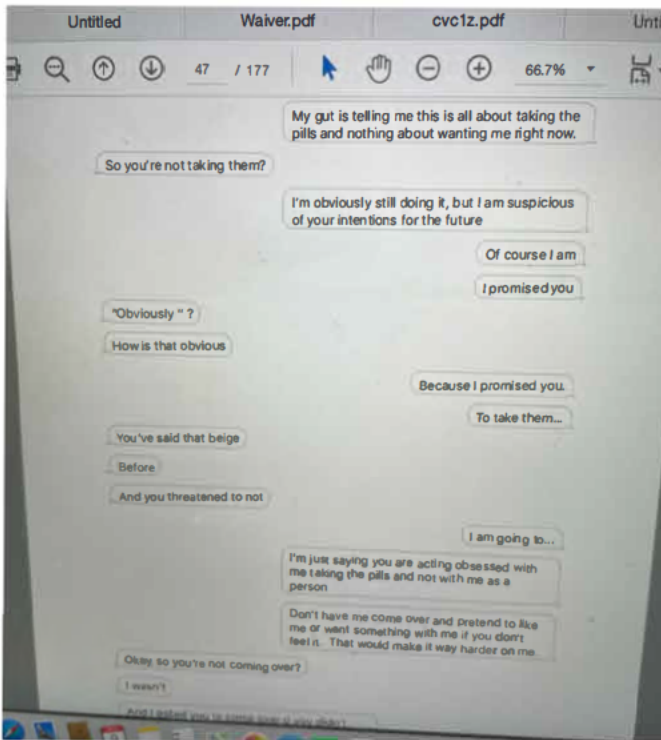
Text messages from Mr. Gallespie coercing Ms. Owens into an abortion











Text messages from Ms. Owens expressing her expectations for the relationship if she were to have an abortion and his responses

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Laura Owens

[REDACTED]

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Gregory Gillespie

[REDACTED]

Scottsdale, AZ 85028

[REDACTED]

Defendant(s) Name/Address/Phone

STATEMENT OF FACTS AND BREACH (CONT)

11. Defendant was steadfast in his viewpoint that the pregnancy be terminated immediately because he did not want a “bastard child” and said he would have no involvement in its life, nor pay child support.
12. Plaintiff did not wish to give up the pregnancy from a spiritual or moral standpoint and planned to proceed with it, even if she was doing it alone.
13. Defendant’s false promises included comments regarding a great opportunity for them to work towards eventual marriage and to have a child ‘the right way’ in the future.
14. Plaintiff indicated to Defendant that she did not expect him to be involved in the rearing and support of this child and did not need to speak with her again if that is what he desired.
15. Defendant refused and instead indicated that he wanted a relationship but he refused to see her or contribute to the relationship until Plaintiff had terminated the pregnancy.
16. Despite Arizona’s five-week pregnancy limit in order to terminate a pregnancy, Defendant found this unacceptable and coerced Plaintiff into obtaining abortion pills using an unorthodox method.
17. Although Plaintiff was reluctant to administer the pills because she felt that she was financially, emotionally, and physically able to create an environment where their child would thrive, Defendant was insistent that she proceed immediately so that they could move on with their future.
18. On July 28, 2021, at around 10pm Plaintiff administered the first pill while over the phone with Defendant.
19. During that conversation Plaintiff reiterated that she did not expect him to participate in the child rearing and support if she were to make the decision to continue her pregnancy.
20. Defendant pleaded with her and said she needed to believe him.
21. On July 29, 2021, Plaintiff administered the second pill incorrectly.
22. After receiving instructions on how to properly administer the second pill, Plaintiff attempted to contact Defendant to administer the second pill over the phone with him, but he was unreachable.
23. Once Plaintiff finally reached Defendant on July 31, 2021, Defendant scolded her for waiting to administer the second pill.

24. On July 31, 2021, Plaintiff correctly administered the second pill after Defendant's persistent insistence that it must be done; however, the termination did not pass as it should.
25. On August 1, 2021, Plaintiff discovered from her doctor that it was a "failed abortion" and that the development of the fetus may not have stopped, but it was uncertain.
26. After attempting to contact Defendant during this time, Plaintiff discovered that Defendant had blocked her from all forms of traditional communication.
27. Upon discovery of the "failed abortion", Defendant panicked and attempted to persuade Plaintiff not only that he had not blocked her from communication, but also that he wanted to stay with her if she followed through with the termination.
28. At that point, Plaintiff indicated that she would let God decide what happened to the fetus at that point regardless of whether she ended up passing it or not.
29. Defendant indicated that he "did not want a retarded bastard child" while also promising that he would attend a wedding with Plaintiff, wanted to start a family with her, and wanted to be introduced to Plaintiff's father (who is suffering from many medical issues) once the pregnancy was terminated.
30. Defendant also indicated that Plaintiff needed to stop playing games with him and that if she wanted a relationship with him, she needed to follow through with the termination.
31. Plaintiff explained that the decision to end a human life was much more serious than any decision she had made before and that she would have to live with the consequences of this for the rest of her life.
32. On August 4, 2021 in text messages sent between Plaintiff and Defendant, Defendant indicated that he wanted to continue the relationship if "we take care of it this week and try for this weekend", and that he promises to "support [her] after this" and they can "begin their relationship" in exchange for terminating the pregnancy. See exhibit [number here].
33. Relying on these representations, Plaintiff was convinced that Defendant's intentions were pure.
34. When the time came for Plaintiff to administer her termination pills, she hesitated and contacted Defendant.
35. Defendant used verbally and emotionally abusive manipulations, even threatening to call the police if she hesitated in terminating the pregnancy. See exhibit [number here].

36. On August 5, 2021, Plaintiff went to Defendant's house where she anticipated he would be there to support her in her emotionally distraught condition due to taking the termination pill on the previous day.
37. Instead, Defendant's behavior was extreme cold and bizarre, as he was telling Plaintiff that she was toying with him and that he could not relax in their relationship until the abortion was done.
38. He further questioned and criticized every action Plaintiff made that night, including making Plaintiff show Defendant that she was properly administering the second pill by showing the inside of her cheek to Defendant because he did not believe that she was taking the pill; Defendant's actions were clear that he cared more about making sure the abortion was done than he did about wanting a future with Plaintiff.
39. Defendant acted disgusted and disrespectful and refused to provide any verbal, emotional, or physical comfort to Plaintiff during this traumatic process until he was convinced that the pregnancy was terminated, causing Plaintiff to leave his house at 1:00AM.
40. By that point Plaintiff had already administered the second pill in Defendant's presence.
41. On August 6, 2021 Plaintiff again discovered that Defendant and blocked her from all forms of traditional communication and social media.
42. Plaintiff is physically, emotionally and psychologically distraught to have go thought the tedious and traumatic process of terminating a pregnancy for the sake of a relationship with Defendant, whom had no intention of having one but used the false promises and abuse to manipulate Plaintiff into believing he did.
43. Defendant continued to call Plaintiff names, including "psychopath", and criticized her participation in Apple Podcast's "Nobody Told Me!" as a "joke".
44. Defendant also threatened to go public with Plaintiff's abortion knowing that Plaintiff would lose respect as an advocate for domestic violation and victim's rights and insisted on recording their phone conversations so that he could repeatedly say that Plaintiff "murdered [his] child".
45. Simply put, Defendant did not want a child to be burn under any circumstances and was willing to say or do whatever it took to get Plaintiff to terminate the pregnancy without consideration for the fetus or Plaintiff.
46. Plaintiff is suffering from a complete state of shock, depression, and guilt over a needless decision that she made for the sake of Defendant's empty promises.