STATECRAFT
LAW • GOVERNMENT • CRISIS MANAGEMENT

649 North Fourth Avenue, First Floor
Phoenix, Arizona 85003
(602) 382-4078

Kory Langhofer, Ariz. Bar No. 024722
kory@statecraftlaw.com
Thomas Basile, Ariz. Bar. No. 031150
tom@statecraftlaw.com

Attorneys for Plaintiff

IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

ELIJAH NORTON, an individual, Plaintiff, v. KIMBERLY YEE, an individual; and NELSON MAR, an individual, Defendants.	No. _____ **COMPLAINT**

Plaintiff Elijah Norton hereby states and alleges as follows:

SUMMARY OF THE CASE

1. Kimberly Yee wanted Elijah Norton's money. When she didn't get it, she contrived a series of vile lies about Mr. Norton's personal life and professional dealings, including that he attempted to "bribe" her, consorted with a "boyfriend" who wore women's clothing, carried out a sexual affair with his male personal assistant (who is married to a woman and has young children), and threatened her with physical harm. She then pullulated these falsehoods among influential leaders in Arizona Republican politics in a vindicative effort to sabotage Mr. Norton's campaign for elected office.

2. Yee's willful propagation of these calumnies caused Mr. Norton substantial damages.

JURISDICTION

3. This Court has jurisdiction over this action pursuant to Article 6, § 14 of the Arizona Constitution and A.R.S. § 12 -123.

4. Venue for this action lies in Maricopa County pursuant to A.R.S. § 12-401 because the Defendants reside in this county.

PARTIES

5. Plaintiff Elijah Norton is an individual who at all times relevant has resided in Maricopa County, Arizona.

6. Defendant Kimberly Yee is an individual who at all times relevant has resided in Maricopa County, Arizona.

7. Defendant Nelson Mar is an individual who at all times relevant has resided in Maricopa County, Arizona. Mar is the spouse of Defendant Yee and is named in this action as a member of the Yee-Mar marital community.

GENERAL ALLEGATIONS

Background

8. Norton owns a group of global insurance and insurance-related companies. He has been in the finance and insurance industry since 2011, and grew his business from a small investment into an organization that generates over half a billion dollars a year in annual revenue, serves over 5 million customers, and operates in multiple countries.

9. From 2023 until 2025, Norton served as the Treasurer of the Arizona Republican Party ("AZGOP"). During his tenure, he donated hundreds of thousands of dollars of his personal funds to help stabilize the AZGOP's finances and volunteered many hours of his time to his responsibilities as an officer of the AZGOP.

10. In or around late November or early December of 2023, Norton had a lunch meeting with Yee, who was at the time the incumbent Arizona State Treasurer. At the time, Norton was contemplating a potential run for the Treasurer's office in 2026. Norton had

STATECRAFT LAW • GOVERNMENT • CRISIS MANAGEMENT

been informed by political fundraisers that Yee was leading a political organization, which Norton assumed to be the "Victory Fund" committees that focused on maintaining Republican majorities in the Arizona Legislature, and wanted to discuss opportunities for her organization to collaborate with the AZGOP.

11. During the lunch, Yee solicited from Norton a $50,000 "gift" to the political committee she was representing, which Norton perceived to be either or both of the Victory Funds. Norton agreed, and subsequently contributed more than $100,000 to the Victory Funds in the first half of 2024.

12. Yee and Norton also briefly discussed Norton's potential campaign for Arizona State Treasurer. Yee encouraged Norton to pursue a candidacy, but they did not discuss the nature of the Treasurer's duties, and Norton did not ask Yee to endorse or otherwise support any possible future campaign.

13. In late September 2024, Norton received a phone call from Yee, who again requested that he make a contribution to her organization. Norton responded that he had already donated at least $100,000 to the Victory Funds (plus over $500,000 to various candidates, political committees, and the AZGOP). Yee clarified that she was actually soliciting a contribution to her own organization, which was not one of the Victory Funds. Norton expressed skepticism about the utility of any contribution in such close temporal proximity to the general election, and Yee indicated she would send Norton materials about the organization. Yee subsequently emailed to Norton a one-page document that largely promoted Yee herself. Because Norton did not perceive Yee's organization as meaningfully benefitting Republican candidates (or anyone other than Yee), he declined to make a contribution.

14. Yee has not made any verbal or written communication to Norton subsequent to that September 2024 interaction.

15. On April 22, 2025, Norton announced his candidacy for Arizona State Treasurer in the 2026 election. At the time, no other Republican was a candidate for that office.

STATECRAFT LAW • GOVERNMENT • CRISIS MANAGEMENT

16. Upon information and belief, Norton's spurning of Yee's demand for money catalyzed in Yee a determination to take vengeance on Norton by publicizing lies about Norton's personal and professional dealings, with the goal of inducing a primary election challenger to Norton and/or deterring Republican leaders and voters from supporting Norton's candidacy.

17. On or around October 23, 2025, Congressman David Schweikert informed Norton that Yee was spreading negative information about Norton and had suggested to Schweikert that she was recruiting someone to run against Norton.

18. On or around November 10, 2025, a Republican activist told Norton that Yee was attempting to recruit Arizona legislator and former Arizona Corporation Commissioner Justin Olson to challenge Norton in the primary election.

19. In late November 2025, Gina Swoboda, who was then the Chair of the AZGOP, relayed to Norton that Yee had attempted unsuccessfully to recruit Pinal County Treasurer Michael McCord to run against Norton.

False Accusation of "Bribery"

20. On November 11, 2025, Merissa Hamilton (now Merissa Caldwell), a Republican activist and leader of a conservative nonprofit organization, telephoned Yee. During the call, Yee stated to Caldwell, "You don't know Elijah Norton as well as you think you do." When Caldwell asked Yee to clarify what she meant by that, Yee responded, "Elijah tried to bribe me."

21. Upon learning of Yee's statement to Caldwell, Norton sent Yee a text message on November 12. The text message reminded Yee that "[t]he purpose of me wanting to meet was not to ask for your endorsement or support but rather find out policy information and understand how you have run the [Treasurer's] office." Norton also suggested that "the most productive way to resolve this would be for us to meet in person," potentially with a mutually agreed-upon third party witness. Yee never responded to Norton's message.

22. Yee's statement that Norton "tried to bribe" her is false. Norton never offered, conferred, or agreed to confer any benefit on Yee with the intent to influence any official act or decision by Yee.

23. More generally, Norton never offered or agreed to provide Yee with anything of value in return for Yee's support or endorsement, and never otherwise engaged in, offered, or agreed to a *quid pro quo* arrangement of any kind with Yee.

24. Yee subjectively knew that her statement that Norton "tried to bribe" her was false.

25. Yee's false statement actually and proximately caused general damages to Norton, including but not limited to impairment of Norton's reputation and standing in the community, mental anguish, and emotional distress.

False Claims of Sexual Conduct

26. In December 2025, Yee set up a meeting with Don Tapia, a former United States Ambassador and major Republican donor, to solicit a campaign contribution. During that meeting, Yee told Tapia that Norton has a "boyfriend" who wears female clothing and indicated that she possessed a corroborating photograph. Yee further stated to Tapia that Norton was carrying on a sexual affair with Andrew Armenta, Norton's personal assistant. Armenta, who is married to a woman and has two young children, previously was employed by Tapia.

27. On December 20, 2025, an Arizona legislator told Norton that he had just persuaded a "high profile" Republican not to run against Norton. This high profile Republican had been contacted by Yee, who told him "very weird" things about Norton's personal life. Upon information and belief, these "very weird" statements were the same as or substantially similar to the statements that Yee had previously made to Tapia.

28. On January 22, 2026, Katherine Haley announced that she would run against Norton for the Republican Party nomination for the office of State Treasurer in the 2026 primary election. Yee publicly endorsed Haley's candidacy shortly thereafter.

STATECRAFT
LAW • GOVERNMENT • CRISIS MANAGEMENT

29. Upon information and belief, Yee's statements that Norton has carried on sexual relationships with cross-dressing males and his married male personal assistant were material to Haley's decision to run for Treasurer.

30. Individuals associated with Haley's campaign repeated statements that were substantially the same as Yee's accusations concerning Norton.

31. On February 11, 2026, Elizabeth Simchak Buchanan, a paid staffer for Haley's campaign, published a post on Facebook stating that Yee had endorsed Haley and that Haley is "running against a guy whose boyfriend wears girly clothes."

32. On or around February 13, 2026, Michael Lombardo, a Republican precinct committeeman, advised Norton that Haley campaign operatives were disseminating messaging that Norton is "gay" and has "a boyfriend that wore daisy dukes."

33. On February 28, 2026, Norton was attending the March for Life, an important and popular event among Republican and conservative activists and influencers, when he was approached by Pat Aquilina, the campaign manager for gubernatorial candidate Andy Biggs. Aquilina stated to Norton that "there is a lady associated with the Haley campaign who is saying that you have a boyfriend that wears a dress and is using that to get signatures." Upon information and belief, that individual was Simchak Buchanan.

34. Later the same day, Simchak Buchanan encountered Merissa Caldwell. Simchak Buchanan stated to Caldwell that Norton is "gay" and that Norton's "boyfriend showed up at a political event one time wearing daisy duke shorts." When Caldwell expressed surprise, Simchak Buchanan assured her that this ostensible information "came from an extremely reliable source. And this is 100% true." Shortly thereafter in the conversation, Simchak Buchanan told Caldwell that she works for Yee and has "known Kimberly [Yee] forever and I trust Kimberly, I trust her."

35. Upon information and belief, Simchak Buchanan's claims concerning Norton originated with, or were based on ostensible information she had received from, Yee.

36. Yee's statements concerning Norton are false.

37. Norton does not have, and has never had, a boyfriend who wears "daisy dukes" or other female clothing.

38. Norton does not have, and has never had, a sexual or romantic relationship of any kind with Armenta.

39. Yee subjectively knew that her statements concerning Norton were false, or at the very least acted with a conscious disregard of their truth of falsity.

40. Yee's false statements concerning Norton actually and proximately caused general damages to Norton, including but not limited to impairment of Norton's reputation and standing in the community, mental anguish, and emotional distress.

41. In addition, Yee's false statements concerning Norton actually and proximately caused special damages in the amount of $2,627,766.97. This sum represents pecuniary losses sustained by Norton in the form of personal funds he expended through his campaign to mitigate or remediate the harm actually and proximately caused by Yee's false statements, including fundraising and political consultant fees.

False Accusation of Physical Threats

42. On or around June 22, 2026, Yee spoke at a meeting of the Legislative District 2 Republican Committee. After the event, Yee spoke with Eric Lovelis, a precinct committeeman who volunteered for Norton's campaign. Lovelis referenced his support for Norton, and Yee responded, "Oh, he threatened me to harm me physically, I have the text proof."

43. Yee's statement to Lovelis was false. Norton never directly or indirectly threatened Yee with physical harm in any form.

44. Yee subjectively knew that her statement to Lovelis was false.

45. Yee's false statement actually and proximately caused general damages to Norton, including but not limited to impairment of Norton's reputation and standing in the community, mental anguish, and emotional distress.

STATECRAFT
LAW • GOVERNMENT • CRISIS MANAGEMENT

Repetition and Republication

46. Upon information and belief, Yee repeated and republished the same or substantially similar claims to numerous other individuals, including Republican grassroots activists, state and local Republican Party leaders, and political professionals.

COUNT I

Defamation

47. Plaintiff incorporates by reference the allegations contained in the foregoing paragraphs as if fully set forth herein.

48. Yee published to third parties multiple statements that falsely state or imply assertions of objective fact of and concerning Norton, including statements that Norton:

a. "tried to bribe" Yee;

b. has a "boyfriend" who wears female clothing;

c. carried on a sexual affair with his married male personal assistant; and

d. "threatened to harm [Yee] physically."

49. All of these statements are, and always were, factually false.

50. Yee's statement that Norton tried to "bribe" her is defamatory *per se*.

51. Yee's statement that Norton attempted to purchase Yee's endorsement brings Norton into disrepute, contempt, or ridicule, or otherwise impeaches his honesty, integrity, virtue, or reputation.

52. Yee's statement that Norton "threatened to harm [her] physically" is defamatory *per se*.

53. Yee's statement that Norton "threatened to harm [her] physically" brings Norton into disrepute, contempt, or ridicule, or otherwise impeaches his honesty, integrity, virtue, or reputation.

54. Yee's statements that Norton had a boyfriend who dressed in female clothing and a sexual or romantic affair with his male personal assistant who is married with children were defamatory because they would, from the point of view of a reasonable person in the audience (to wit, socially conservative activists, donors, Republican Party leaders, and

STATECRAFT LAW • GOVERNMENT • CRISIS MANAGEMENT

Republican primary election voters), bring Norton into disrepute, contempt, or ridicule, or otherwise impeach his honesty, integrity, virtue, or reputation.

55. Yee subjectively knew that her defamatory statements concerning Norton were false, or acted with a reckless disregard of their truth or falsity.

56. Yee's defamatory statements concerning Norton actually and proximately caused general damages to Norton.

57. Yee's defamatory statements concerning Norton actually and proximately caused special damages to Norton in the amount of $2,627,766.97.

58. Yee specifically intended to cause Norton injury or damage by publishing false and defamatory information concerning him.

COUNT II

False Light

59. Plaintiff incorporates by reference the allegations contained in the foregoing paragraphs as if fully set forth herein.

60. Yee gave publicity to ostensible information concerning Norton, including ostensible information that Norton:

a. "tried to bribe" Yee;

b. has a "boyfriend" who wears female clothing;

c. carried on a sexual affair with his married male personal assistant; and

d. "threatened to harm [Yee] physically."

61. All of these statements are, and always were, factually false, and their publicity placed Norton in a false light.

62. The false light in which these statements placed Norton would be highly offensive to a reasonable person in Norton's position—*i.e.*, a candidate for the Republican Party's nomination for statewide office in Arizona.

63. Yee publicized this ostensible information concerning Norton with the subjective knowledge that it was false or with a reckless disregard for its truth or falsity.

STATECRAFT LAW • GOVERNMENT • CRISIS MANAGEMENT

64. In placing Norton in a false light, Yee actually and proximately caused general damages to Norton.

65. In placing Norton in a false light, Yee actually and proximately caused special damages to Norton in the amount of $2,627,766.97.

66. Yee specifically intended to cause Norton injury or damage by placing him in a false light.

DEMAND FOR RELIEF

WHEREFORE, the Plaintiff demands relief in the following forms:

A. An award of actual damages in an amount to be proven at trial, including general damages, as well as special damages in the amount of $2,627,766.97;

B. An award of punitive damages;

C. An award of costs pursuant to A.R.S. § 12-341 or other applicable law;

D. Such other relief as the Court deems necessary, equitable, proper, or just.

DATED this 10th day of November, 2026.

STATECRAFT PLLC

By: */s/ Kory Langhofer*
Kory Langhofer
Thomas Basile
649 North Fourth Avenue, First Floor
Phoenix, Arizona 85003

Attorneys for Plaintiff