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

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ESTATE OF ARTHUR 'AFA' AH LOO,	)	
by and through Personal Representative,	)	
LAURA MARIE AH LOO, LAURA	)	<b>COMPLAINT AND JURY DEMAND</b>
MARIE AH LOO, V.A.L., I.A.L., and	)	
TAUPOUGA FOLASA SAMOA heirs of	)	<b>(Tier 3)</b>
ARTHUR 'AFA' AH LOO, decedent,	)	
	)	
Plaintiffs,	)	<b>Civil No.:</b>
	)	
vs.	)	<b>Judge:</b>

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MATTHEW SCOTT ALDER, an  
individual, SAMANTHA COOPER, an  
individual, TAYLOR STAPLETON, an  
individual; CHARLES J. PADILLA, an  
individual; TRAVIS HYSELL, an  
individual; and COLLIN CATALFAMO,  
an individual; and WENDY GARVIN, an  
individual.

Defendants.

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Plaintiffs, by and through undersigned counsel, Brian C. Stewart of Parker & McConkie and Edward B. Havas and Walter M. Mason of Dewsnup King Olsen Worel Havas, hereby complain against Defendants and allege and seek relief as follows:

**PARTIES**

1. Arthur ‘Afa’ Ah Loo (“Afa” or “Decedent”) was a resident of Davis County, State of Utah.
2. Laura Marie Ah Loo is a resident of Davis County, State of Utah, the wife of Decedent, and the appointed personal representative of Decedent’s estate.
3. V.A.L. and I.A.L., are the biological minor children of Decedent and Laura Marie Ah Loo, who reside with their mother in Davis County, State of Utah.
4. Taupouga Folasa Samoa is a resident of Samoa, and the natural mother of Decedent.
5. Matthew Scott Alder (“Defendant Alder”), based on belief and information, is a resident of Salt Lake County, State of Utah.
6. Samantha Cooper (“Defendant Cooper”), based on belief and information, is a resident of Salt Lake County, State of Utah.

7. Taylor Stapleton (“Defendant Stapleton”), based on belief and information, is a resident of Salt Lake County, State of Utah.

8. Charles J. Padilla (“Defendant Padilla”), based on belief and information, is a resident of Davis County, State of Utah.

9. Travis Hysell (“Defendant Hysell”), based on belief and information, is a resident of Utah County, State of Utah.

10. Collin Catalfamo (“Defendant Catalfamo”), based on belief and information, is a resident of Salt Lake County, State of Utah.

11. Wendy Garvin (“Defendant Garvin”), based on belief and information, is a resident of Salt Lake County, State of Utah.

12. Upon belief and information, Defendants Cooper, Stapleton, Padilla, Hysell, and Catalfamo are part of and/or leaders of an informal association in Utah referred to as Utah 50501, part of a national movement throughout the United States (“National 50501”) encouraging and providing assistance organizing, coordinating, and planning No Kings Rallies throughout the country.

13. Based on belief and information, Defendants Cooper, Stapleton, Padilla, Hysell, and Catalfamo assisted in the organization of the specific No Kings Rally where decedent died, acted as liaisons between law enforcement and Utah 50501, undertook to provide security for the event, and otherwise undertook to organize, plan, and coordinate the event.

14. Armed Queers SLC (hereinafter “Armed Queers”), based on belief and information, is an informal association organized and/or operated in Utah by individual members, including Defendant Alder. At the request of Utah 50501 and/or its leadership, Armed Queers

provided armed security personnel, including Defendant Alder, to assist at the No Kings Rally in Salt Lake City, Utah, at which Decedent was killed.

### **VENUE/JURISDICTION**

15. This action is of a civil nature and jurisdiction is conferred pursuant to Utah Code Ann. § 78A-5-102 (2010).

16. The causes of action and injuries giving rise to this Complaint occurred in Salt Lake County, State of Utah, and thus venue is appropriate in the above-entitled court pursuant to Utah Code Ann. § 78B-3-307 (2008).

17. Pursuant to Rule 26 of the Utah Rules of Civil Procedure, this matter is subject to the standard discovery for Tier 3 because the damages claimed exceed \$300,000.

### **FACTUAL ALLEGATIONS**

18. Plaintiffs, by this reference, incorporate all paragraphs above as if fully set forth herein.

19. Since the November 2024 re-election (“the election”) of President Donald J. Trump, political tension in this country has been exceedingly high.

20. National 50501 emerged as a national movement to unite and coordinate efforts to protest and oppose the agenda of the Trump Administration.

21. National 50501 operated on a platform of “50 protests, 50 states, one movement” to demonstrate against President Trump and his policies.

22. Local groups associated with National 50501, including Utah 50501, quickly developed and became loosely organized throughout states and cities across the United States, through applications such as Reddit, Signal, and Instagram.

23. Leaders of the local groups, including Utah 50501, were chosen from the willing who were interested and had the time to volunteer for the movement's cause.

24. At some point, believed to be in the spring of 2025, National 50501 proposed a "No King's Rally" ("the Rally") to take place the evening of June 14, 2025, in many locations, including downtown Salt Lake City.

25. Consistent with National 50501's purpose, the Rally was to take place in all 50 states.

26. Utah 50501, through its loose organizational structure and often encoded internal communication, planned to participate in the event.

27. National 50501 supplied general information, marketing material, and instruction to local groups, including Utah 50501, on best practices for security and deescalation for an event involving highly charged emotions.

28. When Utah 50501 voluntarily agreed to participate in the mass Rally, Defendants Cooper, Stapleton, Padilla, Hysell, and Catalfamo ("the Leaders") undertook leadership roles planning and executing the Rally.

29. Based upon belief and information, the Leaders, believing that an armed clash with President Trump's supporters was likely, actively supported the arming of Utah 50501 members and the need for armed security at the rally.

30. Based upon belief and information, Defendant Garvin had prior experience in the organization of large rallies, such as the one anticipated on June 14, 2025. At some point during the initial planning for the rally, Utah 50501 contacted Defendant Garvin to assist with organization of the Salt Lake rally.

31. Based upon belief and information, Defendant Garvin communicated with local and state agencies and law enforcement regarding the rally, including planning, security, and the possible presence of armed volunteers.

32. On June 11, 2025, only three days before a highly publicized national rally, an applicant by the name of “Michael Andaman” (“Andaman”) applied online with Salt Lake City for a march permit (“the permit”) between Pioneer Park and the Wallace Bennett Federal Building.

33. The permit sought by Andaman was for the late afternoon No King’s Rally which is the subject of this complaint.

34. In the permit, Andaman claimed he was part of an organization called “Utah Protest and Rally, LLC” and included in his permit that the attendance, despite intense national coverage in the week preceding the events, was expected to be only 1000 people.

35. Because no one has been able to identify Andaman or an actual organization called Utah and Protest Rally, LLC, and because Utah 50501 was the only organization tied to the creation, marketing, advertising, and speaker selection for the rally that matched the permit’s protest and route description, it is believed and therefore alleged that the permit would have only been sought by or at the behest of the Leaders of Utah 50501.

36. In the days leading up to the Rally, Leaders of Utah 50501, in addition to asking its own members to carry concealed weapons, sought additional armed volunteers to act as “peacekeepers” at the event.

37. Peacekeepers were purportedly selected for their prior law enforcement or military experience; however, based upon belief and information, Utah 50501 and its leaders failed to vet the experience of the volunteers or ensure they had proper training to de-escalate tensions.

38. Based upon belief and information, the day before the Rally, the Leaders of Utah 50501 contacted a group called the Armed Queers of SLC to obtain additional armed security.

39. Given that the Leaders of Utah 50501 sought additional armed security within 24 hours of the Rally the Leaders of Utah 50501 gave themselves inadequate time for them and Armed Queers to reasonably investigate the background and experience of those who volunteered to be part of an armed private security force.

40. Defendants acted unreasonably by soliciting individuals to serve as armed security when the rushed timeline meant there was no reasonable expectation that planning or training would be offered before the rally.

41. Based upon belief and information, Defendant Alder was a member of Armed Queers who agreed to serve as a “peacekeeper” and to be part of the private armed security team at the Rally.

42. As the evening of the rally approached on June 14, 2025, the rally began at Pioneer Park (“the park”) in Salt Lake City.

43. Intermixed within the thousands of people who had come to the rally coordinated by Utah 50501 Leaders and Defendant Garvin were armed “peacekeepers,” dressed in yellow vests and carrying radios, including Defendant Alder.

44. Based upon belief and information, the yellow vests and radios were provided to the peacekeepers and other rally personnel by Utah 50501 Leaders.

45. Utah 50501 and its Leaders made no attempt to inform the public that it had recruited armed volunteers with little to no training to serve as “peacekeepers” during the rally.

46. Following an uneventful time at the park filled with guest speakers, the rally was to march toward the Federal Building.

47. Upon belief and information, an unreasonable lack of organization from Defendants acting as Utah 50501 Leaders became apparent as peaceful protestors at the park became confused with no clear route provided to get from the park to the Wallace F. Bennett Federal Building. As a result, throngs of people marched out of the park with little to no coordination.

48. On or around the time the rally was starting its march from the park, Defendant Garvin was notified that a person or people dressed in black with assault type weapon(s) had been identified near the Maverick Basecamp (“Maverick”) store located at 185 S. State Street – a short distance from the Federal Building to which protestors were marching.

49. Based upon belief and information, Defendant Garvin communicated this information to law enforcement.

50. Based upon belief and information, Utah 50501 Leaders were aware of this report, though it is unknown how, or if, the information was shared with those it had deputized as “peacekeepers.”

51. Toward the end of the march, both in time and location, Decedent Arthur ‘Afa’ Ah Loo (“Afa”), a well-known and respected Polynesian family man, stood on the east side of State Street, to the north of Maverick.

52. Afa endeavored to be a champion for social justice and firmly believed in Martin Luther King Jr.’s famous phrase, “Injustice anywhere is a threat to justice everywhere.”

53. As Afa stood watching what he viewed as a triumph of the people, he had no idea what was occurring approximately 150 feet south of him.

54. Unbeknownst to Afa, Defendant Alder and another presently unidentified “peacekeeper” witnessed a man in black with an assault type rifle, later identified as Arturo Gamboa (“Gamboa”), walking from an alley toward State Street on the east side of the road.

55. As Utah is an open-carry state, Gamboa’s carrying of a weapon near a protest, while possibly alarming to some, was not illegal.

56. In fact, a de-escalation manual purportedly used in training by Utah 50501 stated that the presence of a gun in a protest **did not** mean there was going to be imminent violence.

57. Video surveillance prior to the incident showed Gamboa walking to the west toward State Street in all black with his gun pointed toward the ground.

58. Despite any obvious or apparent imminent danger, Defendant Alder pulled out his pistol and aimed it at Gamboa.

59. Based on the direction Defendant Alder was aiming, it would be or should have been obvious that any errant shot fired would pose a lethal danger to bystanders standing behind Gamboa.

60. Even if Defendant Alder felt Gamboa was an imminent threat to himself or others, which he did not have reasonable cause to believe, Defendant Alder could have walked several feet to the west to ensure he was shooting against a wall and not into a crowd of those he claims he intended to protect.

61. Defendant Alder, with little to no known training in crowd control or de-escalation, failed to clear an area behind Gamboa and instead simply started to fire his gun.

62. Defendant Alder is believed to have fired a total of three rounds to “protect” the public from Gamboa. Based upon belief and information, the first or second bullet struck Gamboa causing injury. Unfortunately, Defendant Alder’s third and final round struck Afa in the head.

63. Despite all lifesaving efforts, Afa, the devoted husband, loving father of two young children, and son, was killed by the combined negligence of all Defendants.

### **FIRST CAUSE OF ACTION**

#### **(Negligence as to Defendant Alder)**

64. Plaintiffs, by and through this reference, hereby incorporate all paragraphs above, as if fully set forth herein.

65. Before using lethal force, Defendant Alder had a duty to ensure that the use of said force was reasonable and necessary.

66. Before using lethal force, Defendant Alder had a duty to “clear the zone” behind his target to ensure bullets intended to immobilize or kill a perceived threat would not strike innocent bystanders.

67. Before performing the role as armed security, Defendant Alder had a duty to ensure he understood what was required of him, how to de-escalate situations, how to approach those with firearms, and how to discriminate between a real versus perceived threat.

68. Defendant Alder breached these duties, including but not limited to failing to approach and investigate Gamboa, who was acting lawfully.

69. Defendant Alder’s failure to approach and talk to Gamboa prevented him from learning that Gamboa’s gun was empty and that Gamboa was frequently seen at rallies with his gun.

70. Defendant Alder’s breach of duties, including breaching firearm rules to “clear the zone,” led to him shooting into a crowd of bystanders and killing Afa.

71. Defendant Alder’s breach of these duties constitutes negligence.

72. As a result of Defendant Alder’s negligent conduct, Defendant Alder killed Afa.

### **SECOND CAUSE OF ACTION**

**(Negligence as to Defendants Cooper, Stapleton, Padilla, Hysell, Catalfamo,  
Garvin, and Alder (collectively “Defendants”))**

73. Plaintiffs, by and through this reference, hereby incorporate all paragraphs above, as if fully set forth herein.

74. Defendants had a duty to ensure a reasonably safe plan for the No King’s Rally held on June 14, 2025.

75. In deciding that armed security was necessary at the rally, Defendants had a duty to, among other things:

- a) Ensure that law enforcement and other agencies were made aware of the existence of armed security;
- b) Ensure that the public understood that armed security was present to reduce the chances of negative interactions, such as the one with Gamboa, with members of the protest; and
- c) Ensure that any armed security working for or on their behalf was properly vetted and trained to serve as security and able to de-escalate situations, such as encountering a person with a gun.

76. Defendants had a duty to work with law enforcement to ensure that any possible threats, such as a person with a gun near the Maverick, were reported and addressed in a reasonable manner.

77. Defendants had a duty to obtain a proper permit with Salt Lake City that correctly identified the size of the crowd to ensure that local and state agencies could properly plan for the event. Defendants breached this duty as demonstrated by their last-minute filing of a permit misstating the anticipated crowd and by last-minute attempts to recruit additional armed “peacekeepers.”

78. Defendants’ breaches of these duties resulted in a perfect storm of negligence that caused the only known fatality among a march of millions of Americans.

### **DAMAGES**

79. As a direct and proximate result of the Defendants’ wrongful acts, omissions, negligence, and recklessness, Plaintiffs and the heirs of Decedent have suffered past and future damages, including pain and suffering, lost wages and economic support, funeral costs, and other special and general damages.

80. As a direct and proximate result of Defendants’ wrongful conduct, omissions, negligence, and recklessness, Plaintiffs and the heirs of Decedent have suffered pain and anguish of body and mind, inconvenience, and the loss of companionship, love, comfort, advice, and enjoyment of life arising from Afa’s death.

81. As a direct and proximate result of Defendants’ wrongful conduct, omissions, negligence, and recklessness, Afa suffered pre-death fear, emotional distress, and physical pain, for which his Estate is entitled to compensation.

**PRAYER FOR RELIEF**

BASED UPON THE FOREGOING, Plaintiffs pray for judgment against the Defendants as follows:

- a. For earnings, including lost and diminished earning capacity, in amounts to be proven at trial;
- b. For funeral costs and medical expenses;
- c. For general damages, including pre-death pain and suffering, mental anguish, inconvenience, and the loss of companionship, love, comfort, advice, and enjoyment of life, in amounts to be proven at trial;
- d. For loss of consortium in amounts to be proven at trial;
- e. For pre-judgment interest on the damages assessed by the verdict, the jury, or the court, as are allowable by law;
- f. For all attorney fees, court costs, and litigation expenses allowed by law;  
and
- g. For such other and future relief as the Court deems just and proper.

**JURY DEMAND**

Plaintiffs demand a trial by jury on all issues so triable and submits herewith the jury fee.

DATED this \_\_9th\_\_ day of March 2026.

PARKER & MCCONKIE



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Brian C. Stewart  
James W. McConkie II  
Judson D. Burton

*Attorneys for Estate of Arthur Afa Ah Loo, Laura Marie, V.A.L., and I.A.L.*

DEWSNUP KING OLSEN WOREL HAVAS

/s/ Edward B. Havas\*

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Edward B. Havas  
Walter M. Mason

\*Signed electronically by Brian C. Stewart with  
written permission from Edward B. Havas  
*Attorneys for Taupouga Folasa Samoa*

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