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19 *Attorneys for Plaintiff Jane Doe*

20 **IN THE UNITED STATES DISTRICT COURT**  
21 **FOR THE DISTRICT OF ARIZONA**

22 Jane Doe, an individual,

23 Plaintiff,

24 v.

25 Gordon Sumner, a/k/a Sting, an individual; The  
26 Police; Frontier Booking International,  
27 Incorporated a/k/a FBI; John Doe 1-100; Jane  
Doe 1-100; and Black & White Corporations 1-  
100,  
Defendants.

Case No.

**COMPLAINT AND JURY DEMAND**

COMES NOW Plaintiff, Jane Doe (“Plaintiff”), by and through her attorneys of record,  
and shows unto the Court the following:

**INTRODUCTION**

1  
2 1. Defendant The Police (“The Police”) are a rock band formed in 1977. The band has  
3 primarily consisted of Defendant Gordon Sumner (“Sting”), Andy Summers, and Stewart  
4 Copeland.

5  
6 2. The Police’s 1978 debut album *Outlandos d’Amour* reached No. 6 in the UK and  
7 that was quickly followed by their second album, *Reggatta de Blanc* in 1979, which reached No.  
8 1 on the UK charts.

9  
10 3. After their debut album was released, The Police started on multiple tours across  
11 the United States in late 1978, and into 1979.

12  
13 4. In 1979, Plaintiff and a friend attended an event at which they would have the  
14 opportunity to meet members of The Police. Later that same day, Plaintiff and her family attended  
15 The Police’s performance in Tempe, Arizona.

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17 5. After the performance, Sting invited Plaintiff to an afterparty and ultimately took  
18 her back to his hotel room. Sting was then a twenty-seven-year-old married adult, while Plaintiff  
19 was only a fifteen-year-old child.

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21 6. At the party in Phoenix and at the hotel in Tempe, Arizona, Sting sexually assaulted  
22 and raped Plaintiff. This action is brought to redress the harm that Plaintiff experienced then and  
23 continues to experience today due to Defendant Sting’s misconduct.

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25 7. Plaintiff grew up in a loving and religious household in Arizona and was a fan of  
26 The Police. Plaintiff saved up and purchased tickets to the band’s show for her parents as her father  
27 really liked the song “Roxanne”. At the time of the rape, Plaintiff had never been with another  
person sexually.



1           13. Defendant Gordon Sumner a/k/a “Sting” is an individual and is domiciled and a  
2 citizen of New York County, New York. Sting was a member of the band, The Police and had  
3 recording deals with A&M Records, which ultimately became part of Interscope and Universal  
4 Records, with which Sting still has record deals.

5           14. Defendant The Police is a general partnership for profit with its principal place of  
6 business in New York County, New York and does business in the State of Arizona. Defendant  
7 The Police consists of general partners Gordon Sumner a/k/a Sting, Stewart Copeland, and Andy  
8 Summers.

9           15. Defendant Frontier Booking International, Incorporated (“Frontier”) is a Delaware  
10 corporation with its headquarters and principal place of business in New York City, New York  
11 and does business in the State of Arizona. Defendant Frontier Booking International, Incorporated  
12 is one of the nation’s leading talent agencies, representing a variety of successful performers from  
13 actors and models to singers, designers, and voice-over artists.

14           16. Frontier was founded by Ian Copeland, the older brother of The Police’s drummer,  
15 Stewart Copeland.

16           17. At all times relevant to this Complaint, Frontier was the entity and agency that was  
17 responsible for discovering, promoting, managing, and booking events for Sting and The Police  
18 and booked and managed their tours, including those in 1978-1980.

19           18. Defendants Frontier and The Police, acting through their agents of any kind,  
20 recording artists, and employees, caused acts, events, or omissions to occur in Maricopa County,  
21 Arizona out of which these claims arise.

22           19. Defendants Frontier and The Police have several programs and events that seek out  
23 the participation of children in their activities. These Defendants, through their officials, have  
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1 control over those activities involving children. These Defendants have the power to appoint,  
2 supervise, monitor, and fire each person working with children within their sponsored events and  
3 activities.

4           20. Defendant Sting was and/or is under the supervision, employment and/or control of  
5 Defendants Frontier and The Police when he committed the wrongful acts, events, and/or  
6 omissions.

7           21. At all times alleged, Frontier, The Police, their employees, officials, and/or agents  
8 were acting within the course and scope of employment or, alternatively, acting within their actual  
9 or apparent authority. At all times alleged, Sting was acting as an agent or employee of Defendants  
10 Frontier and The Police and was acting within the course and scopes of his employment and or  
11 actual or apparent authority of those Defendants. The wrongful acts, events, or omission  
12 committed by Defendants including Sting acted individually and in conspiracy with the other to  
13 hide and cover up this sexual assault and rape.

14           22. Defendants JOHN DOE 1-100, JANE DOE 1-100, and BLACK & WHITE  
15 CORPORATIONS 1-100, are fictitious names designating an individual or individuals or legal  
16 entities not yet identified who have acted in concert with the named Defendants either as principals,  
17 agents, co-participants, or co-conspirators whose true names Plaintiff may insert when identified.

18           23. Plaintiff is informed and believes, and on that basis alleges that at all times alleged  
19 herein, Defendants and each of them and JOHN DOES 1-100, JANE DOES 1-100, and BLACK  
20 & WHITE CORPORATIONS 1-100, inclusive were the agents, representatives, and/or employees  
21 of each and every other Defendant. In doing the things hereinafter alleged, Defendants and each  
22 of them, JOHN DOES 1-100, JANE DOES 1-100, and BLACK & WHITE CORPORATIONS,  
23 inclusive were acting within the course and scope of said alternative personality, capacity,  
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1 indemnity, agency, representation, and or employment and were within their actual or apparent  
2 authority.

3 **STATEMENT OF FACTS**

4 24. Upon information and belief, that at all times herein mentioned, Defendant, Gordon  
5 Sumner, has also been known as “Sting.”

6 25. Upon information and belief, that at all times herein mentioned, Sting was a  
7 performer and member of the band The Police.  
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9 26. That at all times herein mentioned, Plaintiff was under the age of 18 years old.

10 27. On May 14, 1979, a record store then located in Papago Plaza in Scottsdale,  
11 Arizona, World Records, held an event in which fans were encouraged and able to meet members  
12 of the band, The Police.  
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14 28. Defendant Sting met Plaintiff during the event held at World Records. Sting  
15 interacted with Plaintiff and took several photographs with Plaintiff while at the event held at  
16 World Records. While there, Sting began grooming Plaintiff and asked her how old she was and  
17 if she was coming to his show later that evening. Plaintiff informed Sting that she was 15 years  
18 old and that she would in fact be at the show later that night.

19 29. The Police’s drummer, Stewart Copeland, filmed throughout the event. Eventually,  
20 Stewart Copeland made a film that featured some of this footage, titled *Everyone Stares: The*  
21 *Police Inside Out*, in which the Plaintiff is included.  
22

23 30. After the event held at World Records, Plaintiff returned home to get ready for the  
24 concert that night. Later that same day, May 14, 1979, The Police performed at Dooley’s, a club  
25 in Tempe, Arizona. Plaintiff, her friend, and her parents visited Dooley’s to watch The Police  
26 perform. Plaintiff went to the show with her friend, and her parents went to the show separately.  
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1           31.     While at the concert at Dooley's, Plaintiff ventured away from her friend. Before  
2 The Police began performing, Sting and the other members of The Police walked through the  
3 audience at Dooley's and visited with members of the audience. Sting found Plaintiff in Dooley's  
4 and talked to her briefly and asked her to sit on his lap during the opening band's performance.  
5 Sting placed Plaintiff on his lap and talked to her about the band.  
6

7           32.     Sting and The Police then performed their set at Dooley's. After The Police  
8 performed, Sting informed Plaintiff of a house party being held that night in Phoenix. Sting asked  
9 Plaintiff to attend the house party with him and others, and Plaintiff agreed.

10          33.     Sting and Plaintiff entered a vehicle driven by The Police's guitarist, Andy  
11 Summers, along with two unidentified women. Plaintiff sat in the front passenger's seat of the  
12 vehicle and spoke primarily with Andy Summers from the venue to the house in Phoenix.  
13

14          34.     Sting sat in the center backseat of the vehicle with the two other unidentified  
15 women on either side of him. During the ride from Dooley's to the house in Phoenix, Sting  
16 repeatedly touched Plaintiff's shoulder in attempts to gain her attention.

17          35.     Once they arrived to the house in Phoenix, all persons in the car went inside the  
18 house. Sting then led the Plaintiff to the backyard, and the pair sat together on a chaise lounge  
19 chair. During the encounter in the backyard, Sting kissed Plaintiff, touched her breasts, and  
20 touched her genitals. Plaintiff then informed Sting again that she was only 15 years old. Sting then  
21 asked her if she was a virgin, to which she replied that she was a virgin and had never been with  
22 anyone before. Nevertheless, Sting persisted talking and touching Plaintiff until they left the party.  
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24          36.     Sting, Plaintiff, and Andy Summers left the party together in the same car. Plaintiff  
25 believed that she would reunite with her friend and return home upon arrival at the venue.  
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1 However, the car went to the Vagabond Inn, the hotel where members of The Police were staying  
2 while in Tempe, Arizona, which was across the street from the venue.

3 37. Once they arrived and Plaintiff realized her friend was not at the venue, Sting and  
4 Plaintiff walked to Sting's hotel room. While in the room, Stewart Copeland filmed Sting and  
5 Plaintiff speaking to each other. Stewart Copeland exited the room at the urging of Sting, leaving  
6 Sting and Plaintiff, a fifteen year old girl, alone in Sting's hotel room.  
7

8 38. Sting removed his pants, exposing himself, and asked Plaintiff if she "wanted a  
9 lolly." Sting then turned Plaintiff around and lifted her dress. During the encounter in the hotel  
10 room, Sting had Plaintiff perform oral sex on him and Sting vaginally penetrated Plaintiff with his  
11 penis.  
12

13 39. After the rape in the hotel room, Sting led Plaintiff out of the hotel room and sent  
14 her home in a taxi. Upon returning home, Plaintiff went to take a shower and discovered she was  
15 bleeding in her vaginal region and was in significant amount of pain. Plaintiff never saw Sting  
16 again after that, nor heard from him.

17 40. Shortly after the incident, Sting famously wrote the lyrics for *Don't Stand So Close*  
18 *to Me*. The Lyrics of the song state:

19 Young teacher, the subject  
20 Of schoolgirl fantasy  
21 She wants him so badly  
22 Knows what she wants to be  
23 Inside her there's longing  
24 This girl's an open page  
25 Book marking - she's so close now  
26 This girl is half his age...

27 Her friends are so jealous  
You know how bad girls get  
Sometimes it's not so easy  
To be the teacher's pet  
Temptation, frustration







1           54. By establishing tours, meet and greets, and events marketed at children, Defendants  
2 The Police and Frontier owed Plaintiff a duty to properly supervise her to prevent harm from  
3 foreseeable dangers.

4           55. Defendants The Police and Frontier breached their duties to Plaintiff. These  
5 Defendants failed to use ordinary care in determining whether their events were safe and/or in  
6 determining whether they had sufficient information to represent their events as safe. Defendants  
7 The Police and Frontier breached their duties including, but not limited to: failure to protect  
8 Plaintiff from a known danger, failure to properly implement policies and procedures to prevent  
9 child sex abuse, failure to properly implement policies and procedures to prevent child sex abuse,  
10 failure to take reasonable measures to ensure that policies and procedures to prevent child sex  
11 abuse were working, failure to adequately inform families and children of the risks of child sex  
12 abuse, failure to investigate risks of child sex abuse, failure to properly train the employees and  
13 agents, failure to protect the children at their events and programs from child sex abuse, failure to  
14 adhere to the applicable standard of care for child safety, failure to investigate the amount and type  
15 of information necessary to represent the events, concerts, programs, agents, employees, and  
16 bandmembers as safe, and failure to properly train their employees and/or agents to identify signs  
17 of child sex abuse.

18           56. Defendants The Police and Frontier breached their duties to Plaintiff by failing to  
19 use reasonable care. These Defendants' failures include, but are not limited to, failing to properly  
20 supervise Defendant Sting and the other members of The Police, failing to properly supervise  
21 Plaintiff, and failing to protect Plaintiff from a known or foreseeable danger.  
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1           57. Defendants The Police and Frontier knew or should have known that Sting was a  
2 danger to children before Sting raped Plaintiff. Prior to the sexual abuse of Plaintiff, Defendants  
3 The Police and Frontier learned or should have learned that Sting was not fit to work with children.

4           58. Defendants knew or should have known that there was a risk of child sex abuse for  
5 children participating in events, programs, and activities within the control of The Police and  
6 Frontier. At the very least, The Police and Frontier knew or should have known that they did not  
7 have sufficient information about whether or not there was a risk of child sex abuse for children  
8 participating in their events, programs, and activities.

9           59. Defendants' actions created a foreseeable risk of harm to Plaintiff. As a vulnerable  
10 child participating in the programs and activities Defendants marketed and offered to minors,  
11 Plaintiff was a foreseeable victim. Additionally, as a vulnerable fifteen-year-old child to whom  
12 Sting had access through Defendants' events, programs, and activities, Plaintiff was a foreseeable  
13 victim.

14           60. As a direct and proximate cause of Defendants' wrongful acts, Plaintiff suffered  
15 and will continue to suffer the future physical and emotional injury including, but not limited to,  
16 great pain of mind and body, shock, mental anguish, emotional distress, embarrassment, loss of  
17 self-esteem, disgrace, humiliation, anger, rage, frustration, loss of enjoyment of life, loss of  
18 consortium, loss of love and affection, sexual dysfunction, past and future medical expenses for  
19 psychological treatment, therapy, and counseling, and past and future loss of earnings.

20           61. WHEREFORE, Plaintiff demands judgment against Defendants Police and  
21 Frontier and requests compensatory and punitive damages, together with interest, costs of suit,  
22 attorneys' fees, and such further relief as the Court deems equitable and just.

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**COUNT III**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

62. Plaintiff incorporates all other paragraphs as if fully set forth herein.

63. Sting’s wrongful conduct, including rape, exceeded the bounds of decency and was extreme and outrageous, causing Plaintiff to suffer severe emotional and psychological distress.

64. In committing these acts described above, Sting acted intentionally and/or recklessly.

65. As a direct and proximate cause of Defendant’s wrongful conduct, Plaintiff suffered and will continue to suffer the future physical and emotional injury including, but not limited to, great pain of mind and body, shock, mental anguish, emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, anger, rage, frustration, loss of enjoyment of life, loss of consortium, loss of love and affection, sexual dysfunction, past and future medical expenses for psychological treatment, therapy, and counseling, and past and future loss of earnings.

66. WHEREFORE, Plaintiff demands judgment against the Defendant, and requests compensatory and punitive damages, together with interest, costs of suit, attorneys’ fees, and such further relief as the Court deems equitable and just.

**COUNT IV**  
**ASSAULT**

67. Plaintiff incorporates all other paragraphs as if fully set forth herein.

68. Defendant Sting intentionally, knowingly, and/or recklessly caused serious physical and mental/emotional injury to Plaintiff.

69. Sting intentionally, knowingly, recklessly, and/or negligently placed Plaintiff in reasonable apprehension of imminent physical injury.



1 pain of mind and body, shock, mental anguish, emotional distress, embarrassment, loss of self-  
2 esteem, disgrace, humiliation, anger, rage, frustration, loss of enjoyment of life, loss of consortium,  
3 loss of love and affection, sexual dysfunction, past and future medical expenses for psychological  
4 treatment, therapy, and counseling, and past and future loss of earnings.

5  
6 80. WHEREFORE, Plaintiff demands judgment against the Defendant, and requests  
7 compensatory and punitive damages, together with interest, costs of suit, attorneys' fees, and such  
8 further relief as the Court deems equitable and just.

9 **JURY TRIAL DEMAND**

10 81. Plaintiff demands a trial by jury on all of the triable issues within this pleading.

11 **PRAYER FOR RELIEF**

12 82. WHEREFORE, Plaintiff prays for the following relief against Defendants:

13 a) For Plaintiff's general and special damages in an amount to be proven at  
14 trial by jury;

15 b) For Plaintiff's incurred costs together with interest at the highest lawful rate  
16 on the total amount of all sums awarded from the date of judgment until paid;

17 c) For the fair and reasonable monetary value of Plaintiff's past, present, and  
18 future pain and suffering in an amount to be proven at trial by jury;

19 d) For the medical expenses incurred up to the date of trial and any additional  
20 expenses necessary for future medical care and treatment;

21 e) Economic damages in the form of out of pocket expenses, lost earnings, and  
22 other economic damages in an amount to be determine at trial of this action;

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f) For punitive damages or exemplary damages to be set by a jury in an amount sufficient to punish Defendant for his outrageous conduct and to make an example of him so that others do not engage in similar conduct in the future;

g) Costs including reasonable attorneys’ fees and costs, court costs, and other litigation expenses; and

h) For such other and further relief as this Court may deem just and proper.

Dated this 18<sup>th</sup> of November, 2020.

/s/ David Matthew Haynie  
**David Matthew Haynie**

/s/ Ashley Pileika  
**Ashley Pileika**

/s/ Damon J. Baldone  
**Damon J. Baldone**

*Attorneys for Plaintiff Jane Doe*