

1 Lindsay Eisenberg, as Next Friend of
2 [REDACTED], a minor

3 [REDACTED]

4 [REDACTED]

5 Self-Represented

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LINDSAY EISENBERG, as next Friend of

12 [REDACTED], a minor,

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Plaintiff,

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v.

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16 CHRISTOPHER SCHOLTES, ERIKA
SCHOLTES (HUSBAND AND WIFE), AND

17 DOES 1-10

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Defendants.

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22 Plaintiff, [REDACTED] ("Plaintiff"), for her causes of action, alleges as follows:

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I. PARTIES, JURISDICTION, AND VENUE

1.Plaintiff, [REDACTED], is a minor child (will reach the age of majority on November 20, 2025) and currently resides in [REDACTED], Maricopa County, Arizona.

Because [REDACTED] does not presently have a parent or legal guardian, this action is brought by and through her next friend, Lindsay Eisenberg, who is a competent adult and acting with the consent of the minor to protect her legal interests pursuant

- 1 to Rule 17(g) of the Arizona Rules of Civil Procedure.
- 2 2. Defendant CHRISTOPHER SCHOLTES (“Defendant Christopher”) is an adult
- 3 individual and resident of Maricopa County, Arizona.
- 4 3. Defendant ERIKA SCHOLTES (“Defendant Erika”) is an adult individual and resident
- 5 of Maricopa County, Arizona, and at all relevant times was married to Defendant
- 6 Christopher.
- 7 4. The acts giving rise to this Complaint occurred in Maricopa County, Arizona, and in
- 8 Pima County, Arizona.
- 9 5. Jurisdiction and venue are proper in this Court pursuant to A.R.S. §§12-123 and 12-
- 10 401.

11 **II. GENERAL ALLEGATIONS**

- 12 6. Plaintiff is the biological daughter of Defendant Christopher Scholtes.
- 13 7. During Plaintiff's childhood, while under the care and custody of Defendants (2016
- 14 to March 2021), Plaintiff was subjected to repeated physical, emotional, and
- 15 psychological abuse by both Defendants.
- 16 8. The abuse included physical assault, verbal degradation, intimidation, neglect, and
- 17 exposure to unsafe and traumatic living conditions.
- 18 9. Plaintiff's abuse was reported to the Arizona Department of Child Safety (“DCS”) on
- 19 at least nine (9) separate occasions, yet DCS failed to take any protective action.
- 20 10. Defendants were aware of the Plaintiff's emotional vulnerability and deliberately
- 21 engaged in conduct intended to cause her fear, humiliation, and psychological trauma.
- 22 11. As a result, Plaintiff suffered severe emotional distress, anxiety, depression, suicidal
- 23 ideations, post-traumatic stress, and long-term psychological harm.
- 24 12. Plaintiff's biological mother passed away in February 2024, leaving Plaintiff without
- 25 her primary emotional support and compounding her trauma and loss.
- 26 13. Only July 9, 2024 Plaintiff's younger half-sister, Parker Scholtes (Age 2), was
- 27 murdered by Defendant Christopher.
- 28 14. On or about October 22, 2025, Defendant Christopher entered and plea of guilty to

1 Second Degree Murder in Pima County Superior Court for the death of Parker
2 Scholtes.

3 15. Defendant Erika Scholtes aided, abetted, and/or directly participated in the abuse of
4 Plaintiff and in maintaining a violent and unsafe home environment.

5 16. The murder of Parker Scholtes was the culmination of a long pattern of abuse, neglect,
6 and violence that Defendants inflicted upon the children in their care.

7 17. In or about 2020, Defendant Christopher filed a fraudulent Conservatorship, Case No.
8 GC20200097, in Pima County Superior Court, claiming control over Plaintiff and her
9 finances.

10 18. At the time, Maricopa County Superior Court had ordered Plaintiff returned to the
11 custody of her biological mother, but Defendant Christopher ignored the order and
12 continued to hold himself out as her conservator.

13 19. Defendant Christopher unlawfully collected government benefits and financial support
14 in Plaintiff's name under the false conservatorship and for his own personal gain.

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16 20. Defendant Erika Scholtes aided, abetted, and/or benefitted from the proceeds of the
17 fraudulent scheme.

18 21. Defendants' conduct was intentional, malicious, fraudulent, and beyond all bounds
19 of decency tolerated in a civilized society.

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21 **III. FIRST CAUSE OF ACTION-INTENTIONAL INFLICTION OF**
22 **EMOTIONAL DISTRESS (IIED)**

23 22. Plaintiff realleges and incorporates Paragraphs 1-21.

24 23. Defendants intentionally or recklessly engaged in extreme and outrageous conduct
25 towards Plaintiff, including physical, emotional, and psychological abuse.

26 24. Defendants knew or should have known their conduct would cause severe emotional
27 distress.

28 25. As a direct and proximate results, Plaintiff suffered PTSD, depression, anxiety, and

1 lasting emotional harm.

2 26. Defendants' conduct was willful, wanton, and malicious, entitling Plaintiff to
3 punitive damages.

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5 **IV. SECOND CAUSE OF ACTION-ASSAULT AND BATTERY**

6 27. Plaintiff realleges Paragraphs 1-26.

7 28. Defendant Christopher, and at time Defendant Erika, intentionally caused Plaintiff to
8 fear imminent harm and made harmful and offensive physical contact.

9 29. These acts constitute assault and battery under Arizona law.

10 30. Plaintiff suffered physical pain, emotional trauma, and ongoing psychological injury.

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12 **V. THIRD CAUSE OF ACTION-CHILD ABUSE (A.R.S. §13-3623)**

13 31. Plaintiff realleges Paragraphs 1-30. 32. At all relevant times, Plaintiff was a minor
14 child under Defendants' care and custody. 33. Defendants willfully and knowingly abused
15 and endangered Plaintiff, causing
16 physical and emotional injury.

17 34. Their conduct violated Arizona's child-abuse statutes and constitutes a civil tort.

18 35. Plaintiff suffered severe and lasting harm as a result.

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20 **VI. FOURTH CAUSE OF ACTION-FRAUD, FINANCIAL EXPLOITATION,**
21 **AND CONVERSION**

22 36. Plaintiff realleges Paragraphs 1-35.

23 37. Defendant Christopher knowingly made false statements to the Court and to
24 government agencies by filing and maintaining a fraudulent conservatorship (Case
25 No. GC20200097) and collecting benefits in Plaintiff's name.

26 38. Defendant Erika Scholtes knowingly assisted or benefited from the fraudulent
27 scheme.

28 39. Defendants' acted with intent to deceive and to obtain financial benefit through

misrepresentation.

40. Plaintiff was deprived of property and benefits and suffered emotional and financial injury.

41. Defendants' conduct was willful, malicious, and in conscious disregard of Plaintiff's rights, entitling her to punitive damages.

VII. FIFTH CAUSE OF ACTION-NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS (NEID)

42. Plaintiff realleges Paragraphs 1-41.

43. Defendants owed Plaintiff a duty to act reasonably and to protect her from foreseeable harm.

44. Defendants breached that duty by abusing, neglecting, and maintaining a violent household that led to Parker Scholtes's death.

45. Plaintiff suffered severe emotional distress as a direct result of Defendants' actions.

46. Defendants' negligence and recklessness proximately cause Plaintiff's injuries.

VIII. DAMAGES

47. As a result of Defendants' conduct, Plaintiff suffered:

- a. Severe emotional distress and mental anguish;
- b. PTSD, anxiety, and depression;
- c. Loss of her sibling, Parker Scholtes;
- d. Grief and loss of her biological mother (February 2024);
- e. Economic losses from fraudulent conservatorship and benefits misuse;
- f. Past and future medical and therapy expenses;
- g. Loss of enjoyment of life, pain, and suffering.

48. Plaintiff seeks compensatory and punitive damages, costs, and other relief.

IX. PRAYER FOR RELIEF

1 2 3 WHEREFORE, Plaintiff respectfully requests that the Court enter a judgment against
5 6 Defendants, jointly and severally, as follows:

- X. A. For general and special damages in an amount to be proven at trial;
B. For punitive and exemplary damages;
C. For pre- and post- judgment interest as allowed by law;
D. For costs of suit and any other relief deemed just and proper.

CERTIFICATE OF COMPULSORY ARBITRATION

8 Pursuant to Rule 72, Arizona Rules of Civil Procedure, Plaintiff certifies that this case is
9 not subject to compulsory arbitration because the amount in controversy exceeds
10 \$50,0000.

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14 Dated this 28 day of October, 2025

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16 Lindsay Eisenberg
17 Next Friend of [REDACTED], a minor
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21 **Exhibits**

- 22 1. Affidavit of Lindsay Eisenberg acting as “Next Friend” Pursuant to Rule 17(g)
23 2. Reports regarding the death of Parker Scholtes
24 3. Arizona Department of Child Safety Reports
25 4. Screenshot of Fraudulent Conservator Case Defendant Scholtes filed for/against
26 Plaintiff
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EXHIBIT “1”

KVOA.com

1 **AFFIDAVIT OF NEXT FRIEND**

2 I, **Lindsay Danielle Eisenberg**, declare under penalty of perjury as follows:

- 3 1. I am over the age of 18 and reside in Peoria, Arizona.
- 4 2. I am not the parent or legal guardian of [REDACTED], born [November 20, 2007], but
- 5 she has **no parent or legal guardian at this time**.
- 6 3. I am a responsible adult familiar with the facts giving rise to this action and am acting **with**
- 7 [REDACTED] **consent** to assist her in pursuing legal relief.
- 8 4. I am not adverse to [REDACTED] interests and will act in good faith for her benefit.

9 **Lindsay Eisenberg**

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11 Date: 10-28-2025
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