

AUG 18, 2022 12:25 PM


Danielle F. Forté, Clerk
Muscoogee County, Georgia

IN THE STATE COURT OF MUSCOGEE COUNTY
STATE OF GEORGIA

JASON L. CRAWFORD,

Plaintiff,

v.

META PLATFORMS, INC., d/b/a
FACEBOOK,

Defendant.

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Civil Action No. _____

COMPLAINT

Comes Now Plaintiff and files this complaint against Defendant, Meta Platforms, Inc. d/b/a Facebook. In support of this Complaint, Plaintiff shows the Court the following:

1. Plaintiff is a resident of Hamilton, Georgia.
2. Defendant Meta Platforms, Inc. d/b/a Facebook (“Facebook”) is a foreign corporation authorized to transact business in Georgia. Defendant’s principle office is located at 1601 Willow Road, Menlo Park, California 94025. Defendant maintains a registered agent for service of process in Georgia, Corporation Service Company, who may be served at 2 Sun Court, Suite 400, Peachtree Corners, Gwinnett County, Georgia 30092.
3. This Court has personal jurisdiction over Defendant, and venue is proper in this Court.
4. Facebook operates a social media site. Plaintiff maintained an account with Facebook until his account was suspended by Facebook on or about Monday, August 15, 2022.
5. On information and belief, Facebook was negligent and violated its own rules in suspending Plaintiff’s account.
6. Defendant suspended Plaintiff’s account for allegedly violating Facebook’s community standards in a way that suggests criminal activity on the part of Plaintiff.

7. Plaintiff engaged in no such activity, in violation of Facebook's community standards or otherwise.

8. Plaintiff is unsure whether his account was hacked or whether Facebook's computer algorithms committed an error in some way.

9. Facebook's rules allow a user to appeal such decisions, but Plaintiff has been shut out of the system completely by Facebook, such that Plaintiff is unable even to learn the alleged violation and unable to follow Facebook's purported appeals process, all in violation of Facebook's own rules.

10. Facebook's conduct was negligent and proximately caused Plaintiff harm. Plaintiff's Facebook account has valuable materials, photographs, narrative content, and communication channels that Plaintiff has been deprived from accessing based on a violation that did not occur.

11. Plaintiff claims general compensatory damages in an amount determined by the enlightened conscience of a fair and impartial jury, but in any event, Plaintiff claims damages in the amount of \$75,000 or less. Plaintiff expressly disavows damages in any amount greater.

Wherefore, Plaintiff prays for the following relief:

a. That summons issue requiring Defendant to appear as provided by law to answer this Complaint;

b. That Plaintiff have a trial by jury;

c. That Plaintiff recover from Defendant an award of damages as provided by Georgia law (alternatively, Defendant can provide information to Plaintiff concerning the alleged violation and an opportunity to show that Plaintiff did not violate Defendant's community standards, especially not by committing an alleged crime);

d. That Plaintiff recover from Defendant an award of general compensatory damages caused

by Defendant's conduct described above (alternatively, Defendant can provide information to Plaintiff concerning the alleged violation and an opportunity to show that Plaintiff did not violate Defendant's community standards, especially not by committing an alleged crime);

- e. That all costs be cast against Defendant; and
- f. For such other and further relief as the Court shall deem just and appropriate.

Respectfully submitted, this 18th day of August, 2022.

CRAWFORD & BROWN LAW FIRM LLP

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By: /s/ Jason L. Crawford
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