

1 RONDA BALDWIN-KENNEDY, ESQ.
2 3301 Spring Mountain Road, Unit 16
3 Las Vegas, NV 89102
4 Telephone: (805) 358-9737
5 Facsimile: (702) 974-0147

6 Pro Per Plaintiff

7 UNITED STATES DISTRICT COURT
8 FOR THE DISTRICT OF NEVADA

| | |
|---|--|
| FILED ENTERED | RECEIVED SERVED ON COUNSEL/PARTIES OF RECORD |
| OCT 27 2023 | |
| CLERK US DISTRICT COURT DISTRICT OF NEVADA | |
| DEPUTY | |

9 RONDA BALDWIN-KENNEDY, an
10 individual, RONDA KENNEDY FOR
11 SENATE, a campaign committee, and
12 RONDA KENNEDY FOR CONGRESS 2020,
a campaign committee.

13 *Plaintiff(s),*

14 vs.

15 META PLATFORMS, Inc., d/b/a
16 FACEBOOK and INSTAGRAM, a
17 corporation. HOANG HAI MOBILE, a
18 Vietnamese Company, Doe's 1-10.

19 *Defendants(s)*

Case No.:

COMPLAINT

1. COMPLAINT,
2. VIOLATION OF THE COMPUTER FRAUD AND ABUSE ACT
3. VIOLATION OF THE STORED COMMUNICATIONS ACT
4. BREACH OF CONTRACT
5. TRESPASS TO CHATTELS
6. FRAUD AND MISREPRESENTATION
7. PRIVACY VIOLATIONS
8. NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS
9. ELECTION INTERFERENCE
10. VIOLATION OF TITLE II OF THE CIVIL RIGHTS ACT OF 1964
11. VIOLATION OF NEVADA PUBLIC ACCOMMODATIONS DISCRIMINATION LAWS
12. FOREIGN INTERFERENCE WITH AN ELECTION 22 USC SEC 2708(K)(4)

1 Plaintiffs Ronda Baldwin-Kennedy, Ronda Kennedy for Senate, and Ronda Baldwin-
2 Kennedy for Congress 2020 (Plaintiffs) represented Pro Per, hereby allege and complain as
3 follows:
4

5 INTRODUCTION

6 1. This action seeks injunctive and other relief relating to the ongoing fraud and
7 misrepresentation Facebook is allowing of the Plaintiffs personal Facebook page, which has
8 been hijacked and is being operated by a Vietnamese Company named Hoang Hai Mobile
9 (Foreign Company). Both Plaintiff's personal and campaign Facebook page for Plaintiff's
10 United States Senate run, named "Ronda Kennedy for Senate" for the State of Nevada,
11 formerly known as Ronda Kennedy for Congress 2020, has also been taken over by this
12 Foreign Company. (See Exhibit A)
13

14 2. Defendant Meta dba as Facebook (Facebook) is allowing for Election Interference by
15 allowing this Foreign Company to operate the Plaintiff's official Facebook Campaign page for
16 US Senate without the Plaintiff's consent yet the page is being operated as if Plaintiff is still
17 operating the campaign page and is doing a rebranding.
18

19 3. Facebook has Breached their contract with the Plaintiffs by not allowing Plaintiffs
20 access to their accounts.
21

22 4. Facebook has received several requests and letters to restore Plaintiffs Facebook
23 account that has gone unanswered. Facebook does not allow any contact by phone to a
24 representative of any kind. Plaintiff is completely locked out of Plaintiff's Facebook account
25 and has tried every remedy available to Plaintiffs.
26

27 5. Facebook has Plaintiffs page verified with a blue checkmark, however Instagram (also
28 owned by Meta) refuses to allow Plaintiff a Blue Checkmark. Plaintiffs made several attempts

1 to verify the Instagram page and has been denied. The fact that one of Meta's companies can
2 verify Plaintiff on a platform but not on another is a form of Election Interference and gives an
3 undue advantage to Plaintiff's opponents who have been verified by both platforms.
4

5 6. Foreign Company who highjacked Plaintiff's account have committed trespass to
6 chattel with several photos and memories that have been saved to Plaintiff's Facebook accounts
7 that Plaintiffs can no longer access.

8 7. Fraud and Misrepresentation is continuing to go on by the defendants with the aid of
9 Meta for as long as Meta refuses to restore the Plaintiffs account to Plaintiffs.
10

11 8. Negligent Infliction of Emotional Distress, this has been very distressing for the
12 Plaintiffs, with worry about the loss of priceless memories, and the havoc it is doing to her
13 campaign has caused severe emotional distress.
14

PARTIES, JURISDICTION AND VENUE

15 9. Plaintiff Ronda Baldwin-Kennedy known hereinafter as RONDA, is a natural person,
16 domiciled in the state of Nevada during all times relevant, and a citizen of the United States of
17 America.
18

19 10. Plaintiff Ronda Kennedy for Senate, known hereinafter as SENATE, is a Campaign
20 Committee for RONDA, organized in the State of Nevada for the office of US Senate.
21

22 11. Collectively, Plaintiffs are known hereinafter as Plaintiffs.

23 12. Defendant Meta Platforms, Inc. d/b/a Facebook and Instagram, hereinafter known as
24 META, is a Corporation with the principal place of business located at 1601 Willow Road,
25 Menlo Park, California 94025.

26 13. Defendant Hoang Hai Mobile is a Vietnamese Company with stores open in Tokyo and
27 Osaka, Japan. Hereinafter referred to as Foreign Company.
28

1 14. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332, if there is
2 diversity of citizenship and the amount in controversy exceeds \$75,000.

3 15. Venue is proper in this district under 28 U.S.C. § 1391, because it has committed
4 actions within the district by operating Facebook and Instagram in the District.
5

6 **GENERAL ALLEGATIONS**

7 16. At or around the beginning of June 8th of 2023, RONDA had received an alert that her
8 account had a new login attempt she indicated she didn't recognize the login and the login was
9 from Ho Chi Minh City, VN. (See Exhibit B)
10

11 17. RONDA then received several more emails over the next few days about someone
12 trying to get into her account. Including, emails in Vietnamese trying to change her email
13 address for her Facebook account. (See Exhibit C) Ronda took repeated steps to try and secure
14 her account as recommended by META. (See Exhibit D)
15

16 18. On June 9th 2023, META acknowledged in an email that "it looks like someone may
17 have accessed" RONDA's account. (See Exhibit E)

18 19. A notice was sent on June 11th of an unusual login near Los Angeles, CA and another
19 email stating a login was attempted in Crossings, FL, while RONDA was in Iowa for a funeral.
20 (See Exhibit F)
21

22 20. An alert was then given to RONDA that her email address had been changed. A link
23 was given to try and reverse the email but the link provided would not reverse the email
24 change. (See Exhibit G) After that, RONDA was completely locked out of her Facebook
25 including her Campaign Page for SENATE.

26 21. FACEBOOK does not provide any way to contact a customer support person or any
27 way to reverse this process once an account gets highjacked.
28

1 22. On June 12th, 2023, RONDA sent a demand letter to META via email stating the
2 problem and to return the account immediately. (See Exhibit H) To date META has not
3 replied.
4

5 **COUNT I: Negligence**

6 23. Plaintiff re-alleges and incorporates by reference the allegations contained in
7 paragraphs 1 through 23 as if fully set forth herein.

8 24. For Negligence, META had a duty to keep Plaintiff's account and pages safe. At the
9 very least, META had a duty to work with Plaintiffs to restore Plaintiffs account. By META
10 not providing a way for Plaintiffs to restore Plaintiffs Facebook account and allowing Foreign
11 and Doe Defendants to operate Plaintiffs Facebook account and SENATE page Facebook and
12 their parent company META have breached that duty. Plaintiffs continue to be harmed by not
13 being allowed to access their memories and pictures saved on their page as well as the
14 interference with Plaintiffs Election to US Senate as it is unknown the damage and messages
15 that FOREIGN COMPANY and Doe Defendants have been using Plaintiff's Facebook account
16 for. Further, it is unknown how many donations and supporters SENATE Plaintiff has lost due
17 to FOREIGN COMPANY and Doe Defendants interference and META's negligence in
18 allowing harm to Plaintiffs.
19
20
21

22 **COUNT II - VIOLATION OF THE COMPUTER FRAUD AND ABUSE**

23 **ACT**

24 25. Plaintiff re-alleges and incorporates by reference the allegations contained in
25 paragraphs 1 through 24 as if fully set forth herein.
26
27
28

1 26. Defendant's actions, through its failure to secure Plaintiff's account from
2 unauthorized access and its failure to restore access to Plaintiff, violate the Computer Fraud
3 and Abuse Act, 18 U.S.C. § 1030(a)(2).
4

5 **COUNT III: Breach of Contract**

6 27. Plaintiff re-alleges and incorporates by reference the allegations contained in
7 paragraphs 1 through 26 as if fully set forth herein.

8 28. In the privacy policy provided by Facebook to users under page 15 of 31 in its
9 Terms of Service state in part, "Promoting safety, integrity and security on and across the Meta
10 Products: The Meta Products are designed to research and help ensure the safety, integrity and
11 security of those services and those people who enjoy them, on and off Meta Products. We
12 process information we have associated with you and apply automated processing techniques
13 and, in some instances, conduct manual (human) review to:

14 *Verify accounts and activity,*

15 *Find and address violations of our terms or policies. In some cases, the decisions we make*
16 *about violations are reviewed by the ,*

17 *Investigate suspicious activity,*

18 *Detect, prevent and combat harmful or unlawful behavior, such as to review and, in some*
19 *cases, remove content reported to us,....."*

20 By META not adequately protecting Plaintiffs' private information or giving Plaintiffs a way to
21 get back into their Facebook account, META is liable for breach of contract by their own terms
22 of services as stated above. (See Exhibit I)
23
24
25
26
27
28

1 29. Defendant's conduct, by failing to secure the stored communications in Plaintiff's
2 account and failing to prevent unauthorized access to those communications, violates the
3 Stored Communications Act, 18 U.S.C. § 2701(a).
4

5 **Count IV: Trespass to Chattels**

6 30. Plaintiff re-alleges and incorporates by reference the allegations contained in
7 paragraphs 1 through 29 as if fully set forth herein.

8 31. FOREIGN COMPANY and Doe Defendants have intentionally interfered with
9 Plaintiff's personal property by fraudulently obtaining access and locking Plaintiffs out of their
10 Facebook account. Plaintiff SENATE continues to suffer untold losses in Donations and
11 support as well as the emotional damage to RONDA in not being able to access her personal
12 private information on her Facebook account or know the damage Defendants are doing to her
13 account.
14

15 32. Facebook's Terms of Service constitute a binding contract. Facebook breached
16 this contract by failing to provide a secure system, failing to respond to Plaintiff's notifications
17 of unauthorized access, and failing to adhere to their privacy policy, as detailed in their terms
18 of service (Exhibit 6). See, e.g., Fink v. Time Warner Cable, 810 F.Supp.2d 633 (S.D.N.Y.
19 2011) (service provider's failure to provide promised services constituted a breach of contract).
20
21

22 **Count V: Fraud and Misrepresentation**

23 33. Plaintiff re-alleges and incorporates by reference the allegations contained in
24 paragraphs 1 through 32 as if fully set forth herein.

25 34. FOREIGN COMPANY and Doe Defendants used Fraud and Misrepresentation by
26 presenting themselves as RONDA in order to gain access to RONDA's Facebook account and
27 SENATE page.
28

1 35. Defendants have committed trespass to chattels by intentionally dispossessing Plaintiffs
2 of their digital property or by using or intermeddling with Plaintiffs' digital property. See, e.g.,
3 eBay, Inc. v. Bidder's Edge, Inc., 100 F.Supp.2d 1058 (N.D. Cal. 2000) (unauthorized use of
4 information from website constituted trespass to chattels).
5

6 36. Defendants engaged in fraud and misrepresentation by knowingly making false
7 representations to Plaintiffs, which Plaintiffs reasonably relied upon to their detriment.

8 **Count VI: Privacy Violations**

9
10 37. Plaintiff re-alleges and incorporates by reference the allegations contained in
11 paragraphs 1 through 36 as if fully set forth herein.

12 38. Doe Defendants have accessed and likely shared Plaintiff's private information
13 making this a case of invasion of privacy.

14 39. Defendants have intruded upon Plaintiffs' seclusion or solitude or into their
15 private affairs. See, e.g., Restatement (Second) of Torts § 652B (intrusion upon seclusion
16 claim).
17

18 **Count VIII: Negligent Infliction of Emotional Distress**

19 40. Plaintiff re-alleges and incorporates by reference the allegations contained in
20 paragraphs 1 through 39 as if fully set forth herein.

21
22 41. Defendants' wrongful actions have caused extreme emotional distress to
23 Plaintiff that has affected her mental and physical health.

24 **Count IX: Election Interference**

25
26 42. Plaintiff re-alleges and incorporates by reference the allegations contained in
27 paragraphs 1 through 41 as if fully set forth herein.
28

1 43. META, FOREIGN COMPANY and the Doe Defendants all are participating in
2 Election interference. META has been advised that being locked out of Plaintiffs account and
3 the SENATE page being manipulated and changed is affecting Plaintiffs chances at election
4 and giving my opponents an undue advantage. By META not taking action and allowing this
5 Fraud to continue, they are participating in Election Interference.
6

7 44. FOREIGN COMPANY and Doe Defendants have targeted my Campaign Page and
8 have started editing it. I believe they targeted my page in order to cause election interference
9 and give my opponents an undue advantage. Further, they could have changed my donate link
10 in order to steal from my campaign contributors. It is not known to Plaintiffs to what extent
11 FOREIGN COMPANY and Doe Defendants have done to the SENATE page.
12

13 45. INSTAGRAM and its parent company META have denied a verification blue
14 checkmark to Plaintiffs for her SENTA Instagram page, that is still under the Plaintiffs' control.
15 They have denied the Plaintiffs even after Facebook gave a Blue Checkmark of verification to
16 the Plaintiffs, and the Plaintiffs have complied with all the requirements and submitted several
17 requests to be verified on Instagram.
18

19 46. Several of Plaintiff's SENATE opponents are verified and have a Blue Checkmark for
20 verification on their Instagram accounts. By denying the Plaintiffs a Blue Checkmark of
21 Verification, they are purposely giving an undue advantage to the Plaintiffs opponents by
22 making Plaintiff SENATE page seem less legitimate than her opponents. Instagram is doing so
23 knowing that voters look for verification of candidates to make sure they are legitimate and not
24 fake accounts. This practice by Instagram is leading to less support and donations than
25 otherwise would be realized for SENATE.
26
27
28

1 **COUNT X: VIOLATION OF TITLE II OF THE CIVIL RIGHTS ACT**
2
3 **OF 1964**

4 47. Plaintiff re-alleges and incorporates by reference the allegations contained in
5 paragraphs 1 through 46 as if fully set forth herein.

6 48. Title II prohibits discrimination in public accommodations, such as hotels,
7 restaurants, and other places that provide goods and services to the public. Instagram and Meta
8 are violating this prohibition by not allowing the only Black Candidate for US Senate in
9 Nevada a blue checkmark for verification but allowing her opponents to have her white
10 opponents to have a Blue Checkmark. This is a clear case of discrimination of a protected
11 class. (See Exhibit)
12

13 **COUNT XI: Violation Of Nevada Public Accommodations Discrimination**

14 **Laws**

15
16 49. Plaintiff re-alleges and incorporates by reference the allegations contained in
17 paragraphs 1 through 48 as if fully set forth herein.

18
19 50. Nevada also prohibits discrimination in public accommodations based on protected
20 characteristics. This means that businesses and places that offer goods and services to the
21 public are generally required to provide equal access and service to all individuals, regardless
22 of their protected characteristics.

23 51. By Instagram not allowing Plaintiffs a blue checkmark even when Plaintiff has fulfilled
24 all requirements to receive a blue checkmark and allowing all Plaintiffs white opponents a blue
25 checkmark shows clear discrimination from INSTAGRAM based on protected characteristics
26 of Plaintiff RONDA.
27
28

1 **COUNT X: VIOLATION OF 22 U.S.C. § 2708(k)(4) - FOREIGN**

2 **ELECTION INTERFERENCE**

3
4 52. Plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 51 as
5 if fully set forth herein.

6 53. Defendant's FOREIGN COMPANY and Does 1-10 conduct, as described herein,
7 constitutes foreign election interference as defined in 22 U.S.C. § 2708(k)(4) because it
8 involved unauthorized access (hacking) and dissemination of altered information with the
9 specific intent to influence, undermine confidence in, or alter the result or reported result of, a
10 Federal, State, or local election or caucus.

11
12 54. The Defendant's actions were performed in coordination with, or on behalf of, a foreign
13 entity or government.

14
15 55. As a direct and proximate result of Defendant's violation of 22 U.S.C. § 2708(k)(4),
16 Plaintiff has suffered a lose of Campaign support, Campaign donations, and voter confidence.

17 **FIRST CLAIM FOR RELIEF**

18 56. Plaintiffs incorporate and reallege the previous paragraphs as though fully set forth
19 herein.

20
21 57. The parties in this action are adverse and there is an actual controversy because they
22 disagree as to whether Defendants were Negligent, Breached their contract with Plaintiff, and
23 have violated both state and federal discrimination laws.

24 58. Plaintiffs have the right for continued Fraud and Misrepresentation to come to an end
25 and her account rightfully restored to her as soon as possible.
26
27
28

1 59. The foregoing issues are ripe for judicial determination because there is a substantial
2 controversy between parties having adverse legal interests of sufficient immediacy and reality
3 to warrant the issuance of a declaratory judgment.
4

5 **SECOND CLAIM FOR RELIEF**

6 60. Plaintiffs incorporate and reallege the previous paragraphs as though fully set forth
7 herein.

8 61. At all times relevant, the Defendants agreed to and did conspire to willfully and
9 maliciously injure Plaintiffs in its property, reputation, trade, business or profession through
10 the fraud committed by the Doe Defendants as described.
11

12 62. FOREIGN COMPANY and Doe Defendants conspired to commit the frauds alleged
13 within this Complaint in that all Defendants conspired to accomplish the fraudulent scheme by
14 either direct action or choosing not to correct the wrongful action by FOREIGN COMPANY
15 and Doe Defendants.
16

17 63. Defendants had a meeting of the minds to accomplish that goal through one or more
18 unlawful acts of fraud as alleged herein, and Plaintiffs suffered harm as a result of Defendants'
19 conduct.
20

21 64. As a direct and proximate consequence of the Defendants' actions, Plaintiffs has been
22 injured in its business and property, causing Plaintiffs to suffer monetary damages in an
23 amount not less than \$300,000.00 said damages to be proven at the time of trial.

24 65. Because Defendants violate the terms of 18 U.S.C. § 1964(c), Defendants are liable to
25 Plaintiff for three times the damages Plaintiff has sustained, plus the cost of this suit, including
26 any injunctive relief the court deems reasonable.
27
28

1 66. Accordingly, the Plaintiffs is entitled to an award of punitive damages from Defendants
2 and each of them in an amount to be proven at trial and sufficient to punish, penalize and deter
3 Defendants from engaging in such conduct in the future.
4

5 **JURY DEMAND**
6

7 67. Pursuant to Fed. R. Civ. P. 38(b), Plaintiffs hereby demands a trial by jury on all issues
8 so triable that are raised herein or which hereinafter may be raised in this action.
9

10 **PRAYER FOR RELIEF WHEREFORE**
11

12 Plaintiffs prays for judgment against Defendants as follows:
13

14 68. Finding that all defendants are jointly and severally liable for all damage caused to
15 Plaintiffs;

16 69. Awarding Plaintiff monetary damages in an amount not less than \$300,000 said amount
17 to be proven at trial;
18

19 70. Awarding Plaintiffs enhanced (treble) monetary damages pursuant to 18 U.S.C. § 1964(c);

20 71. Awarding Plaintiff its litigation expenses, including reasonable costs, and disbursements;

21 72. Awarding Plaintiffs punitive damages in the sum of not less than \$1,000,000.00 or an
22 amount otherwise to be decided by a jury; and
23

24 \\
25

26 \\
27

28 \\
29

30 \\
31

1 73. Granting such other relief as the case may require or as may be deemed proper and
2 equitable.

3
4 74. And injunctive relief.

5 Respectfully Submitted,

6 Date: October 22, 2023

/s/ Ronda Baldwin-Kennedy
Ronda Baldwin-Kennedy

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8 Pro Per
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16 corporation. HOANG HAI MOBILE, a
17 Vietnamese Company, Doe's 1-10.

18 *Defendants(s)*

Case No.:

19
20 **EXHIBIT A**
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3

Search Results for

ronda baldwin-kennedy

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Pages

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Ronda Baldwin-Kennedy (Hoàng Hải Mobile) ✓

Personal blog · 2.9K followers

Hoàng Hải Mobile

4 posts in the last 2 weeks

Following



Ronda Baldwin-Kennedy ✓

5d · 🌐



As we our page standing good we would like to change request below detail

-Current Page name: Ronda Baldwin-Kennedy

-Desired Page name: Hoàng Hải Mobile

- Reason Re-branding page name

Same people and service, with a new look and name that's convenient for advertising and complies with Facebook's policies.

👍 2

1 comment

Like

Comment

Share



Ronda Baldwin-Kennedy is in Atlanta, GA.

September 25, 2020 · 🌐



Advisory Board Members of Black Voices for Trump praying over me. 🙏

[Black Voices for Trump](#)

[#atlanta](#) [#blackvoicesfortrump](#) [#blackeconomicempowerment](#)

[#ca26](#) [#ronda4congress](#) [#venturacounty](#) [#california](#)





193
 29 comments
 41 shares

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 Comment
 Share



Michael Kennedy
August 16 · 🌐



[Ronda Baldwin-Kennedy](#) Fox and Friends Interview!



Whitney Gustafson, Debbie Harris and 4 others

2 shares

Like

Comment

Share



Write a comment...





Ronda Baldwin-Kennedy (Hoàng Hải Mobile)

2.9K followers • 295 following

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Intro

Hoàng Hải Mobile

 **Page** · Personal blog

 Ronda Kennedy for Congress 2020
is responsible for this Page

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Ronda Kennedy @Ronda4Congress

Catch my interview today at 4:30pm PST with @RealWayneRoot on Lindell-TV2 Live 24/7 [frankspeech.com/live-stream/wa...](#) #Nevada #Ronda4Senate #Lasvegas #senate #thepeoplefirst

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Ronda Kennedy
FOR US SENATE



3

Posts

Filters



Ronda Baldwin-Kennedy

October 21 at 4:58 PM ·



As we our page standing good we would like to change request below detail

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- Reason Re-branding page name

Same people and service, with a new look and name that's convenient for advertising and complies with Facebook's policies.

2

1 comment

Like

Comment

Share



Write a comment...





Matthew John
Damn Chi-coms



Like Reply 5d



Ronda Baldwin-Kennedy updated their cover photo.

5d · 🌐



Like

Comment

Share



Write a comment...



Ronda Baldwin-Kennedy updated their profile picture.

5d · 🌐





Kathy Seaman Gummere and 2 others

Like

Comment

Share



Write a comment...



Ronda Baldwin-Kennedy is in Las Vegas.

May 10 ·



Going to be on the [@andrew_wilkow](#) show [@siriusxm](#) ch. 125 today at 11:40am PST! [#patriotxm](#) [#sirius](#) [#patriots](#) [#nevada](#) [#lasvegas](#) [#senate](#) [#thepeoplefirst](#) [#rondakennedy4senate](#)

CALL ANDREW AT 1.866.95.PATRIOT

WEEKDAYS NOON - 3PM ET / WEEKENDS 9AM - NOON ET

"Raised during Reagan, suffered through Clinton" - ,
Wilkow provides perfectly executed political analysis
unmistakable opinions in "one thing and one thing
only...and that is rational thought."





Carlos Velasco, Tammy Boyd and 27 others

2 comments

Like

Comment

Share



Write a comment...



Bruce Weide

Throw us a link or a replay, eh?



Like Reply 24w

[View more comments](#)



Ronda Baldwin-Kennedy

May 6 ·



rondakennedy4senate

Reels · May 6 ·





Had a blast at the @yellowstone party @richardharrislawfirm Ranch. #Nevada #ussenate

Is How We Roll Florida C

Edward Franklin, Tammy Boyd and 17 others

3 comments

Like

Comment



Write a comment...



Tammy Boyd Looking fabulous girl ! Keep up the good work !

Like Reply 24w

View more comments



Ronda Baldwin-Kennedy is in Las Vegas.

April 26 · 🌐



At the Legislative Hearing on AB-400 I have 10 year old triplets our family supports school choice! [Joe Lombardo for Governor](#) #NV #AB400 #SchoolChoice





3



You, Edward Franklin, Tammy Boyd and 9 others

1 comment 1 share

Like

Comment

Share



Write a comment...



Marcia Wertz

Did you guys move to NV?? Miss hearing you speak at all the meetings in Ca last couple years! ❤️ 🇺🇸 🇺🇸

Like Reply 20w





Ronda Baldwin-Kennedy ✓ (Hoàng Hải Mobile)

2.9K followers • 295 following

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About

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Contact info








Websites and social links


 <https://www.hoanghaimobile.com/>
Website


 Hoàng Hải Mobile
Snapchat


 Hoàng Hải Mobile
Threads


 Hoàng Hải Mobile
Instagram


 Hoàng Hải Mobile
Twitter

 Hoàng Hải Mobile
YouTube

 Hoàng Hải Mobile
Skype

 Hoàng Hải Mobile
GitHub

 Hoàng Hải Mobile
LinkedIn

 Hoàng Hải Mobile
VK

Followers

Followers

Following

Mutual Following

Ronda Baldwin-Kennedy's list of followers is unavailable.





3

Photos

Ronda Baldwin-Kennedy's Photos

Tagged photos

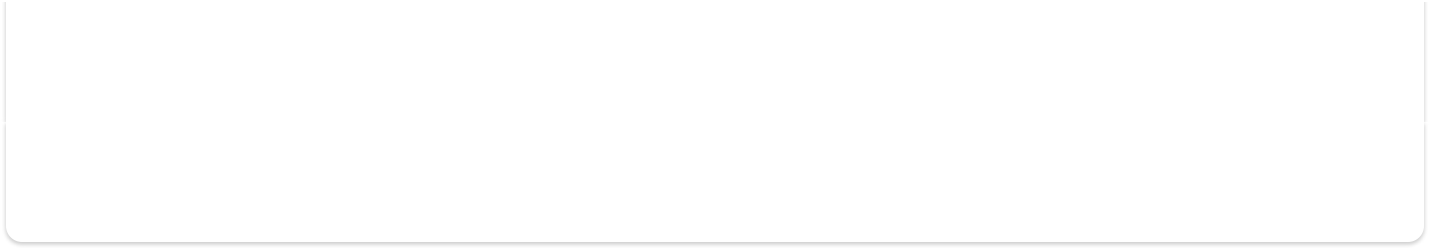
Albums



See all



3



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Case No.:

19
20 **EXHIBIT B**
21
22
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25
26
27
28

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Compose

Back Archive Move Delete Spam ... >

27

• Fwd: Your recent Facebook login yahoo/inbox

- Inbox 117K
- Unread
- Starred
- Drafts 28
- Sent
- Archive
- Spam
- Trash
- Less
- Views Hide
- Photos
- Documents
- Emails to myself
- Subscriptions
- Shopping
- Receipts
- Credits
- Travel
- Folders Hide
- New Folder
- bills 10
- blended
- car 5
- craig crossley
- Danny Polychrome
- extra party
- Faxes 1
- go daddy
- kD Brown
- Marc Bass
- Marva King 1
- Mr. Jackson
- OMV 3
- PR
- redemption
- Ronda 4
- trademark
- video to Shawn
- website

Ronda Baldwin <rondabaldwin@gmail.com> Fri, Oct 27 at 12:49 PM

To: Ronda Baldwin

From: Facebook <security@facebookmail.com>
Date: June 8, 2023 at 3:37:36 AM PDT
To: Ronda Baldwin-Kennedy <rondabaldwin@gmail.com>
Subject: Your recent Facebook login
Reply-To: noreply <noreply@facebookmail.com>



Hi Ronda,

Your Facebook account was recently logged into using a confirmation code and the email address **rondabaldwin@yahoo.com** on Thursday, June 8, 2023 at 5:37 AM (CDT).

Operating system: Windows
 Browser: Chrome
 IP address: 2402:800:639f:dea3:a1aa:955c:99c:d7bd
 Estimated location: Ho Chi Minh City, HO CHI MINH CITY, VN

If you did this, you can safely disregard this email.

If you didn't do this, please [secure your account](#).

Thanks,
The Facebook Security Team

from



© Facebook. Meta Platforms, Inc., Attention: Community Support, 1 Facebook Way, Menlo Park, CA 94025

This message was sent to rondabaldwin@gmail.com.
 To help keep your account secure, please don't forward this email. [Learn more](#)



[Reply](#), [Reply All](#) or [Forward](#)

Send | **B** *I* **A**




Ronda Kennedy

rondabaldwin@gmail.com
 (805) 358-9737
[Edit contact](#)


- extra party
- Faxes 1
- go daddy
- kD Brown
- Marc Bass
- Marva King 1
- Mr. Jackson
- OMV 3
- PR
- redemption
- Ronda 4
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Send     |  **B** *I*  **A** 

1 RONDA BALDWIN-KENNEDY, ESQ.
2 3301 Spring Mountain Rd. Unit 16
3 Las Vegas, NV 89102
4 Telephone: (805) 358-9737
5 Facsimile: (702) 974-0147

6 Pro Per Plaintiff

7 UNITED STATES DISTRICT COURT
8
9 FOR THE DISTRICT OF NEVADA

10 RONDA BALDWIN-KENNEDY AND
11 RONDA KENNEDY FOR SENATE.

12 *Plaintiff(s)*,

13 vs.

14 META PLATFORMS, Inc., d/b/a
15 FACEBOOK and INSTAGRAM, a
16 corporation. HOANG HAI MOBILE, a
17 Vietnamese Company, Doe's 1-10.

18 *Defendants(s)*

Case No.:

19
20 **EXHIBIT C**
21
22
23
24
25
26
27
28

Fwd: Email address already in use

From: Ronda Baldwin (rondabaldwin@gmail.com)

To: rondabaldwin@yahoo.com

Date: Friday, October 27, 2023 at 12:17 PM PDT

From: Facebook <info++aazqxq4qhtrgea@support.facebook.com>
Date: June 8, 2023 at 6:14:19 PM PDT
To: rondabaldwin@gmail.com
Subject: Email address already in use
Reply-To: Facebook <info++aazqxq4qhtrgea@support.facebook.com>

Hi,

Cảm ơn bạn đã báo cáo. Bạn cần xác nhận mình sở hữu địa chỉ email này trước khi chúng tôi có thể gỡ địa chỉ này khỏi Facebook.

Để làm vậy, vui lòng trả lời bằng địa chỉ email bạn đang báo cáo. Sau khi bạn trả lời bằng địa chỉ email đó, chúng tôi sẽ gỡ ngay địa chỉ đó khỏi tài khoản Facebook của bạn.

Cảm ơn bạn,
Đội ngũ Facebook

1 RONDA BALDWIN-KENNEDY, ESQ.
2 3301 Spring Mountain Rd. Unit 16
3 Las Vegas, NV 89102
4 Telephone: (805) 358-9737
5 Facsimile: (702) 974-0147

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13 vs.

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17 Vietnamese Company, Doe's 1-10.

18 *Defendants(s)*

Case No.:

19
20 **EXHIBIT D**
21
22
23
24
25
26
27
28

Fwd: Someone may have accessed your account

From: Facebook <security@facebookmail.com>
Date: June 8, 2023 at 3:44:25 AM PDT
To: Ronda Baldwin-Kennedy <rondabaldwin@gmail.com>
Subject: **Someone may have accessed your account**
Reply-To: noreply <noreply@facebookmail.com>



 Hi Ronda,

It looks like someone may have accessed your Facebook account. To secure your account, you'll need to answer a few questions and change your password the next time you go to Facebook.

For your protection, no one can see you on Facebook until you secure your account.

Thanks,
The Facebook Security Team

Secure Your Account Now

from



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This message was sent to rondabaldwin@gmail.com.
To help keep your account secure, please don't forward this email. [Learn more](#)

Did you just change your password?

Best Regards,

Ronda N. Baldwin-Kennedy, Esq.
Law Office of Ronda Baldwin-Kennedy
5627 Kanan Road Ste. 614
Agoura Hills, CA 91301
P:951-268-8977
F: 702-974-0147
c:661-600-2264

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Begin forwarded message:




From: Facebook <security@facebookmail.com>
Date: June 8, 2023 at 8:27:10 AM PDT
To: Ronda Baldwin-Kennedy <rondabaldwin@gmail.com>
Subject: Did you just change your password?
Reply-To: noreply <noreply@facebookmail.com>



Hi Ronda,

This is to let you know that your password was just changed.

About this change

 Thursday, June 8, 2023 at 10:26 AM (CDT)
 Near Redmond, United States
 iPhone 14 Pro Max, iOS

This wasn't me

If this was you, you don't need to do anything.

Thanks,
The Facebook Security Team

from



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This message was sent to rondabaldwin@gmail.com.
To help keep your account secure, please don't forward this email. [Learn more](#)

Fwd: Did you just reset your password?

From: Ronda Baldwin (rondabaldwin@gmail.com)

To: rondabaldwin@yahoo.com

Date: Friday, October 27, 2023 at 12:52 PM PDT




From: Facebook <security@facebookmail.com>
Date: June 9, 2023 at 6:56:37 AM PDT
To: Ronda Baldwin-Kennedy <rondabaldwin@gmail.com>
Subject: Did you just reset your password?
Reply-To: noreply <noreply@facebookmail.com>



Hi Ronda,

This is to let you know that your password was just reset.

About this change

 Friday, June 9, 2023 at 8:56 AM (CDT)
 Near Miami, United States
 Galaxy S9+, Android

Thanks,
The Facebook Security Team

from



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This message was sent to rondabaldwin@gmail.com.
To help keep your account secure, please don't forward this email. [Learn more](#)

Fwd: 35478847 is your Facebook account recovery code

From: Ronda Baldwin (rondabaldwin@gmail.com)

To: rondabaldwin@yahoo.com

Date: Friday, October 27, 2023 at 12:52 PM PDT

From: Facebook <security@facebookmail.com>
Date: June 9, 2023 at 6:55:49 AM PDT
To: Ronda Baldwin-Kennedy <rondabaldwin@gmail.com>
Subject: **35478847 is your Facebook account recovery code**
Reply-To: noreply <noreply@facebookmail.com>



Hi Ronda,

We received a request to reset your Facebook password.
Enter the following password reset code:

35478847

Alternatively, you can directly change your password.

[Change password](#)

Didn't request this change?

If you didn't request a new password, [let us know](#).

from



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This message was sent to rondabaldwin@gmail.com.
To help keep your account secure, please don't forward this email. [Learn more](#)

Fwd: 75008462 is your Facebook account recovery code

From: Ronda Baldwin (rondabaldwin@gmail.com)

To: rondabaldwin@yahoo.com

Date: Friday, October 27, 2023 at 12:53 PM PDT

From: Facebook <security@facebookmail.com>
Date: June 9, 2023 at 6:56:51 AM PDT
To: Ronda Baldwin-Kennedy <rondabaldwin@gmail.com>
Subject: **75008462 is your Facebook account recovery code**
Reply-To: noreply <noreply@facebookmail.com>



Hi Ronda,

We received a request to reset your Facebook password.
Enter the following password reset code:

75008462

Alternatively, you can directly change your password.

[Change password](#)

Didn't request this change?

If you didn't request a new password, [let us know](#).

from



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This message was sent to rondabaldwin@gmail.com.
To help keep your account secure, please don't forward this email. [Learn more](#)

Fwd: 75008462 is your Facebook login code

From: Ronda Baldwin (rondabaldwin@gmail.com)

To: rondabaldwin@yahoo.com

Date: Friday, October 27, 2023 at 12:54 PM PDT

From: Facebook <security@facebookmail.com>
Date: June 10, 2023 at 8:45:44 PM PDT
To: Ronda Baldwin-Kennedy <rondabaldwin@gmail.com>
Subject: 75008462 is your Facebook login code
Reply-To: noreply <noreply@facebookmail.com>



Hi Ronda,

You can enter this code to log into Facebook:

75008462

If you weren't trying to log in, [let us know](#).

This message was sent to rondabaldwin@gmail.com.

Meta Platforms, Inc., Attention: Community Support, 1 Facebook Way, Menlo Park, CA 94025

Login alert for Chrome on Windows

From: Facebook (security@facebookmail.com)

To: rondabaldwin@yahoo.com

Date: Sunday, June 11, 2023 at 08:55 AM PDT

Login alert

Hi Ronda,

We noticed an unusual login from a device or location you don't usually use. Was this you?

New login

June 11, 2023 at 10:55 AM

Near The Crossings, FL, United States

Chrome on Windows

Review login

Manage alerts

from

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This message was sent to rondabaldwin@yahoo.com.
To help keep your account secure, please don't forward this email. [Learn more](#)

Login alert for Chrome on Windows

From: Facebook (security@facebookmail.com)

To: rondabaldwin@yahoo.com

Date: Sunday, June 11, 2023 at 08:55 AM PDT



Hi Ronda,

We noticed an unusual login from a device or location you don't usually use. Was this you?

New login

 June 11, 2023 at 10:55 AM

 Near Los Angeles, CA, United States

 Chrome on Windows

[Review login](#)

[Manage alerts](#)

from



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This message was sent to rondabaldwin@yahoo.com.
To help keep your account secure, please don't forward this email. [Learn more](#)

Someone may have accessed your account

From: Facebook (security@facebookmail.com)

To: rondabaldwin@yahoo.com

Date: Sunday, June 11, 2023 at 09:15 AM PDT

Facebook

Hi Ronda,

It looks like someone may have accessed your Facebook account. To secure your account, you'll need to answer a few questions and change your password the next time you go to Facebook.

For your protection, no one can see you on Facebook until you secure your account.

Thanks,
The Facebook Security Team

Secure Your Account Now

from

© Facebook. Meta Platforms, Inc., Attention: Community Support, 1 Facebook Way, Menlo Park, CA 94025

This message was sent to rondabaldwin@yahoo.com.
To help keep your account secure, please don't forward this email. [Learn more](#)

URGENT: Your Facebook Account has been restricted from advertising

From: Meta for Business (advertise-noreply@support.facebook.com)

To: rondabaldwin@yahoo.com

Date: Sunday, June 11, 2023 at 08:55 AM PDT

Your Facebook Account has been restricted from advertising

Hi Ronda,

After a review of your Facebook Account Ronda Baldwin-Kennedy, its access to advertising is now restricted because of inauthentic behavior or violations of our Advertising Policies or Community Guidelines.

Any ads connected to this Facebook Account that were running are now disabled.

Facebook Account

Ronda Baldwin-Kennedy

Restrictions

Ad Account, ads and other advertising assets

What you can do

Learn best practices to resolve advertising restrictions

Watch video

Request another review

You can request another review of this decision if you believe your Facebook Account shouldn't be restricted. Once you have requested another review it usually takes a few days to receive another decision.

Fix issue

You can also visit the Business Help Center to learn more about [advertising restrictions](#).

This message was sent to rondabaldwin@yahoo.com. If you don't want to receive these emails from Meta in the future, please [unsubscribe here](#).

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- Inbox 117K
- Unread
- Starred
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- Sent
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 - Emails to myself
 - Subscriptions
 - Shopping
 - Receipts
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- Folders Hide
 - New Folder
 - bills 10
 - blended
 - car 5
 - craig crossley
 - Danny Polychrome
 - extra party
 - Faxes 1
 - go daddy
 - kD Brown
 - Marc Bass
 - Marva King 1
 - Mr. Jackson
 - OMV 3
 - PR
 - redemption
 - Ronda 4
 - trademark
 - video to Shawn
 - website

Facebook www.facebook.com

Visit site

45752497 is your Facebook account recovery code Yahoo/Inbox

Facebook <security@facebookmail.com> To: Ronda Baldwin-Kennedy Sat, Jun 10 at 8:50 PM



Hi Ronda,

We received a request to reset your Facebook password. Enter the following password reset code:

45752497

Alternatively, you can directly change your password.

Change password

Didn't request this change? If you didn't request a new password, let us know.

from



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- kD Brown
- Marc Bass
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- website



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 - Emails to myself
 - Subscriptions
 - Shopping
 - Receipts
 - Credits
 - Travel
- Folders Hide
 - New Folder
 - bills 10
 - blended
 - car 5
 - craig crossley
 - Danny Polychrome
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 - go daddy
 - kD Brown
 - Marc Bass
 - Marva King 1
 - Mr. Jackson
 - OMV 3
 - PR
 - redemption
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 - video to Shawn
 - website



Visit site

45752497 is your Facebook account recovery code Yahoo/Inbox

Facebook <security@facebookmail.com> To: Ronda Baldwin-Kennedy Sat, Jun 10 at 8:48 PM



Hi Ronda,

We received a request to reset your Facebook password. Enter the following password reset code:

45752497

Alternatively, you can directly change your password.

Change password

Didn't request this change? If you didn't request a new password, let us know.

from



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 - PR
 - redemption
 - Ronda 4
 - trademark
 - video to Shawn
 - website



Visit site

45752497 is your Facebook login code Yahoo/Inbox

Facebook <security@facebookmail.com> Sat, Jun 10 at 8:45 PM

To: Ronda Baldwin-Kennedy

Facebook

Hi Ronda,

You can enter this code to log into Facebook:

45752497

If you weren't trying to log in, [let us know](#).

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Faxes 1

go daddy

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Marc Bass

Marva King 1

Mr. Jackson

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website

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- Starred
- Drafts 28
- Sent
- Archive
- Spam
- Trash
- Less
- Views Hide
 - Photos
 - Documents
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Facebook www.facebook.com

Visit site

Someone may have accessed your account Yahoo/Inbox

Facebook <security@facebookmail.com> To: Ronda Baldwin-Kennedy Sun, Jun 11 at 9:15 AM

Facebook

Hi Ronda,

It looks like someone may have accessed your Facebook account. To secure your account, you'll need to answer a few questions and change your password the next time you go to Facebook.

For your protection, no one can see you on Facebook until you secure your account.

Thanks, The Facebook Security Team

Secure Your Account Now

from

Meta

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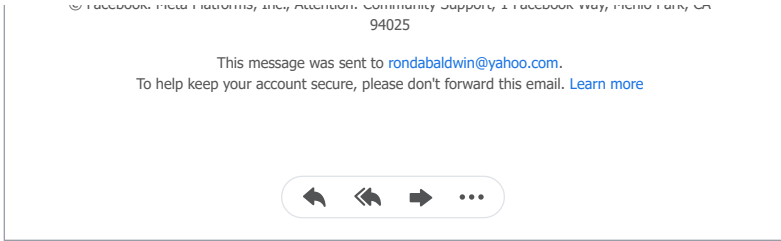
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- extra party
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 - Marc Bass
 - Marva King 1
 - Mr. Jackson
 - OMV 3
 - PR
 - redemption
 - Ronda 4
 - trademark
 - video to Shawn
 - website

Facebook www.facebook.com

Visit site

Did you just add an email address? Yahoo/Inbox

Facebook <security@facebookmail.com> To: Ronda Baldwin-Kennedy Sun, Jun 11 at 9:22 AM

Facebook

Hi Ronda,

This is to let you know that an email address was just added to your Facebook account.

About this request

- Unknown
- Unknown

This wasn't me

If this was you, you don't need to do anything.

Thanks, The Facebook Security Team

from Meta

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This message was sent to rondabaldwin@yahoo.com. To help keep your account secure, please don't forward this email. Learn more

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- extra party
- Faxes 1
- go daddy
- kD Brown
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Facebook Add keywords Advanced

Home

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- Inbox 117K
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 - Mr. Jackson
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 - PR
 - redemption
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 - trademark
 - video to Shawn
 - website

Facebook www.facebook.com

Visit site

Did you just remove your email address? Yahoo/Inbox

Facebook <security@facebookmail.com> Sun, Jun 11 at 9:23 AM To: Ronda Baldwin-Kennedy

Facebook

Hi Ronda,

This is to let you know that the email address rondabaldwin@yahoo.com was just removed from your Facebook account.

About this change

- Sunday, June 11, 2023 at 11:23 PM (UTC+07)
- Near Los Angeles, United States
- Chrome, Windows

This wasn't me

If this was you, you don't need to do anything.

Thanks, The Facebook Security Team

from

Meta

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Password

.....

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We'll send you a code to your email

To read your notifications, we can send a login code to:

d*****s@hotmail.com



Ronda Baldwin-Kennedy

Facebook user

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Meta © 2023

Choose a way to log in

How do you want to get the code?

Send code via email
d*****s@hotmail.com

Enter password to log in



Ronda Baldwin-Kennedy
Facebook user

[Not you?](#) [Continue](#)

You can see your name and profile picture because you're using a computer network you've logged in on before.

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- Friending
- Facebook Dating
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- Stories
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- Videos
- Gaming
- Pages
- Groups
- Events
- Fundraisers and Donations
- Meta Pay
- Marketplace
- Apps
- Facebook Mobile Apps

Privacy Rights Reports

Please use this form to request for more information related to your Privacy Rights

State/Territory

Nevada



What product are you submitting a request for?

Facebook



What best describes your issue?

- I need help accessing my account.
- How do I report a Privacy Violation (Photo or Video)?
- How can I exercise my privacy rights?

This form is only meant for inquiries related to your privacy rights.

If you need help **logging into your account**, please visit this [Help Center article](#).

If your account is disabled, you can learn more about why your profile may have been disabled and what you can do **if you think it was disabled by mistake** by visiting this [Help Center article](#).

If you think your account was **hacked**, you can secure it by going to this [Help Center article](#).

Submit

1 RONDA BALDWIN-KENNEDY, ESQ.
2 3301 Spring Mountain Rd. Unit 16
3 Las Vegas, NV 89102
4 Telephone: (805) 358-9737
5 Facsimile: (702) 974-0147

6 Pro Per Plaintiff

7 UNITED STATES DISTRICT COURT
8
9 FOR THE DISTRICT OF NEVADA

10 RONDA BALDWIN-KENNEDY AND
11 RONDA KENNEDY FOR SENATE.

12 *Plaintiff(s).*

13 vs.

14 META PLATFORMS, Inc., d/b/a
15 FACEBOOK and INSTAGRAM, a
16 corporation. HOANG HAI MOBILE, a
17 Vietnamese Company, Doe's 1-10.

18 *Defendants(s)*

Case No.:

19
20 **EXHIBIT E**
21
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Fwd: Someone may have accessed your account

From: Ronda Baldwin (rondabaldwin@gmail.com)

To: rondabaldwin@yahoo.com

Date: Friday, October 27, 2023 at 12:53 PM PDT

From: Facebook <security@facebookmail.com>
Date: June 9, 2023 at 6:59:30 AM PDT
To: Ronda Baldwin-Kennedy <rondabaldwin@gmail.com>
Subject: Someone may have accessed your account
Reply-To: noreply <noreply@facebookmail.com>



 Hi Ronda,

It looks like someone may have accessed your Facebook account. To secure your account, you'll need to answer a few questions and change your password the next time you go to Facebook.

For your protection, no one can see you on Facebook until you secure your account.

Thanks,
The Facebook Security Team

Secure Your Account Now

from



© Facebook. Meta Platforms, Inc., Attention: Community Support, 1 Facebook Way, Menlo Park, CA 94025

This message was sent to rondabaldwin@gmail.com.
To help keep your account secure, please don't forward this email. [Learn more](#)

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12 *Plaintiff(s).*

13 vs.

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16 corporation. HOANG HAI MOBILE, a
17 Vietnamese Company, Doe's 1-10.

18 *Defendants(s)*

Case No.:

19
20 **EXHIBIT F**
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Crossings FI

From: Ronda Baldwin (rondabaldwin@gmail.com)

To: rondabaldwin@yahoo.com

Date: Friday, October 27, 2023 at 01:17 PM PDT

From: Facebook <security@facebookmail.com>
Date: June 11, 2023 at 8:55:47 AM PDT
To: Ronda Baldwin-Kennedy <rondabaldwin@gmail.com>
Subject: Login alert for Chrome on Windows
Reply-To: noreply <noreply@facebookmail.com>



Login alert

Hi Ronda,

We noticed an unusual login from a device or location you don't usually use. Was this you?

New login



June 11, 2023 at 10:55 AM



Near The Crossings, FL, United States



Chrome on Windows

[Review login](#)

[Manage alerts](#)

from



© Facebook. Meta Platforms, Inc., Attention: Community Support, 1 Facebook Way, Menlo Park, CA 94025

This message was sent to rondabaldwin@gmail.com.
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2 3301 Spring Mountain Rd. Unit 16
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5 Facsimile: (702) 974-0147

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8
9 FOR THE DISTRICT OF NEVADA

10 RONDA BALDWIN-KENNEDY AND
11 RONDA KENNEDY FOR SENATE.

12 *Plaintiff(s)*,

13 vs.

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16 corporation. HOANG HAI MOBILE, a
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18 *Defendants(s)*

Case No.:

19
20 **EXHIBIT G**
21
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Fwd: Did you just remove your email address?

From: Ronda Baldwin (rondabaldwin@gmail.com)

To: rondabaldwin@yahoo.com

Date: Friday, October 27, 2023 at 12:15 PM PDT

Begin forwarded message:

From: ronda baldwin <rondabaldwin@gmail.com>
Date: June 11, 2023 at 10:49:01 AM PDT
To: noreply <noreply@facebookmail.com>
Subject: Re: Did you just remove your email address?

I did not change my email address or my phone number. Please, cancel the email change or send me a new link to this email.

On Sun, Jun 11, 2023 at 10:47 AM ronda baldwin <rondabaldwin@gmail.com> wrote:
Link does not work. Can't reverse what the hacker did.

On Sun, Jun 11, 2023 at 9:12 AM Facebook <security@facebookmail.com> wrote:

Facebook

Hi Ronda,

This is to let you know that the email address rondabaldwin@gmail.com was just removed from your Facebook account.

About this change

Sunday, June 11, 2023 at 11:12 AM (CDT)
Near Los Angeles, United States
Chrome, Windows

This wasn't me

If this was you, you don't need to do anything.

Thanks,
The Facebook Security Team

from

© Facebook. Meta Platforms, Inc., Attention: Community Support, 1 Facebook Way, Menlo Park, CA
94025

This message was sent to rondabaldwin@gmail.com.
To help keep your account secure, please don't forward this email. [Learn more](#)

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2 3301 Spring Mountain Rd. Unit 16
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4 Telephone: (805) 358-9737
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6 Pro Per Plaintiff

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18 *Defendants(s)*

Case No.:

19
20 **EXHIBIT H**
21
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Hacked Facebook Account for Ronda Baldwin-Kennedy

Ronda Baldwin-Kennedy, Esq.

Mon 6/12/2023 6:09 PM

To: subpoena@facebook.com <subpoena@facebook.com>

Cc: Harvey Specter <Harveyspecter@lorbk.com>

Please be advised that The Law Office of Ronda Baldwin-Kennedy is the legal representative of Ronda Baldwin-Kennedy. On June 8, 2023 an attempt was made to hack Ms. Baldwin-Kennedy's Facebook account, an email was sent and Ms. Baldwin-Kennedy immediately took steps to stop the unauthorized access. Ms. Baldwin-Kennedy used two step authentication for her account, it is unknown at this time how additional attempts to hack Ms. Baldwin-Kennedy's account was accomplished. At approximately 11:18 AM CST, the email and phone number associated with Ms. Baldwin-Kennedy's account was changed without authorization. Ms. Baldwin-Kennedy is a political public figure and unauthorized accesses to her account could have dire consequences. Ms. Baldwin-Kennedy has been a member of Facebook since 2003, she has pictures and irreplaceable memories on her timeline of loved ones who have passed. At this time we are requesting the assistance of Facebook to return access to Ms. Baldwin-Kennedy's account.

Previous login information-
Rondabaldwin@gmail.com
805-358-9737

We look forward to hearing from you in an attempt to amicably resolve this matter, should have any questions comments or concerns please feel free to contact us. .

Best Regards,

Ronda N. Baldwin-Kennedy, Esq.
Law Office of Ronda Baldwin-Kennedy
5627 Kanan Road Ste. 614
Agoura Hills, CA 91301
P: 951-268-8977
F: 702-974-0147

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18 *Defendants(s)*

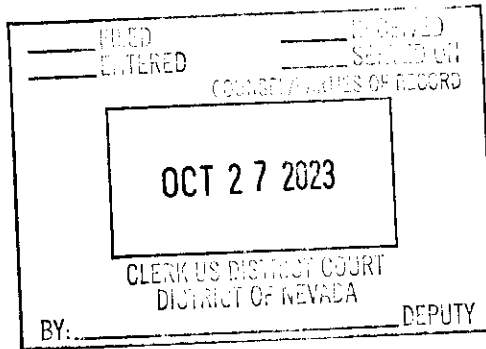
Case No.:

19
20 **EXHIBIT I**
21
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| <p style="text-align: center;">Why and how we process your information</p> | <p style="text-align: center;">Information categories we use (see 'What Information do we collect?' for more information on each information category)</p> <p style="text-align: center;">The actual information we use depends on your factual circumstances, but could include any of the following:</p> |
|--|---|
| <p>Promoting safety, integrity and security on and across the Meta Products: The Meta Products are designed to research and help ensure the safety, integrity and security of those services and those people who enjoy them, on and off Meta Products. We process information we have associated with you and apply automated processing techniques and, in some instances, conduct manual (human) review to:</p> <ul style="list-style-type: none"> • Verify accounts and activity, • Find and address violations of our terms or policies. In some cases, the decisions we make about violations are reviewed by the Oversight Board ↗, • Investigate suspicious activity, • Detect, prevent and combat harmful or unlawful behavior, such as to review and, in some cases, remove content reported to us, • Identify and combat disparities and racial bias against historically marginalized communities, • Protect the life, physical or mental health, well-being or integrity of our users or others, • Detect and prevent spam, other security matters and other bad experiences, • Detect and stop threats to our personnel and property, and • Maintain the integrity of our Products. <p>For more information on safety, integrity and security generally on Meta Products,</p> | <p>Your activity and information you provide::</p> <ul style="list-style-type: none"> • Content you create, like posts, comments or audio • Content you provide through our camera feature or your camera roll settings, or through our voice-enabled features • Messages you send and receive, including their content, subject to applicable law • Metadata about content and messages, subject to applicable law • Types of content you view or interact with, and how you interact with it • Apps and features you use, and what actions you take in them • Purchases or other transactions you make, including truncated credit card information • Hashtags you use • The time, frequency and duration of your activities on our Products <p>Friends, followers and other connections</p> <p>App, browser and device information:</p> <ul style="list-style-type: none"> • Device characteristics and device software • What you're doing on your device, like whether our app is in the foreground or if your mouse is |

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6 Pro Per Plaintiff



7 UNITED STATES DISTRICT COURT
8
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11 RONDA KENNEDY FOR SENATE.

12 *Plaintiff(s),*

13 vs.

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15 FACEBOOK and INSTAGRAM, a
16 corporation. Hoang Hai mobile, a
17 Vietnamese Company, doe's 1-10

18 *Defendants(s)*

Case No.:

**PLAINTIFFS'
MEMORANDUM OF POINTS
AND AUTHORITIES IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

19
20 **INTRODUCTION**

21 If Defendants announced to the world that foreign actors, could easily hack a politicians
22 Facebook Campaign page including Presidential candidates everyone would see the Election
23 interference problem. The Defendants did not just allow it to happen they remained silent when
24 Plaintiffs repeatedly asked them to restore Plaintiffs' page.

25 While Plaintiff is locked out of their page Plaintiffs' political opponents are able to seek
26 donations and stream live on the Facebook platform, putting Plaintiff at a disadvantage.
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FACTUAL BACKGROUND

The Importance of Social-Media Platforms as the “Modern Public Square.”

Social-media platforms are “the modern public square.” *Packingham v. North Carolina*, 137 S. Ct. 1730, 1737 (2017). They are “for many the principal sources of knowing current events” and for “speaking and listening in the modern public square, and otherwise exploring the vast realms of human thought and knowledge.” *Id.* Social-media platforms “provide perhaps the most important and powerful mechanisms available to a private citizen to make his or her voice heard.” *Id.* “They allow a person with an Internet connection to ‘become the town crier with a voice that resonates farther than it could from any soapbox.’” *Id.* (quoting *Reno v. ACLU*, 521 U.S. 844, 870 (1997)). Social-media “users can petition their elected representatives and otherwise engage with them in a direct manner.” *Id.* at 1735. “[S]ocial media users employ these websites to engage in a wide array of protected First Amendment activity on topics ‘as diverse as human thought.’” *Id.*

“The Facebook suite of apps is valuable largely because 3 billion people use it.” *Biden v. Knight First Amendment Institute at Columbia Univ.*, 141 S. Ct. 1220, 1224 (2021) (Thomas, J., concurring); *see also* Kennedy Decl. Ex. 2. Facebook has close to 3 billion registered users worldwide and over 235 million users in the United States, including millions of Nevadans, and citizens of other States.

Political Candidates use social media as a valuable tool to reach millions of voters and donors at little to no cost.

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ARGUMENT

“To be entitled to a preliminary injunction, a movant must establish (1) a likelihood of success on the merits; (2) a substantial threat of irreparable injury; (3) that the threatened injury if the injunction is denied outweighs any harm that will result if the injunction is granted; and (4) that the grant of an injunction will not disserve the public interest.” *Ladd v. Livingston*, 777 F.3d 286, 288 (5th Cir. 2015). All four of these factors favor an injunction here.

I. The Plaintiffs Are Likely to Prevail on the Merits on all Counts of the Complaint.

A. The Plaintiffs Are Likely To Prevail on Their Negligence Claim.

META owed a duty to safeguard Plaintiff's account and associated pages. This duty is reminiscent of obligations recognized in cases involving data breaches and the responsibilities of online platforms to protect user data. For instance, in **Sony Gaming Networks and Customer Data Security Breach Litigation**, 996 F.Supp.2d 942 (S.D. Cal. 2014), the court acknowledged that companies may possess a duty to safeguard personal information, and a failure in this aspect could be deemed negligence.

Further, the case **In re Zappos.com, Inc., Customer Data Security Breach Litigation**, 888 F.3d 1020 (9th Cir. 2018) underscores the real-world consequences and credible threat of harm faced by users when their data or accounts are mishandled by platforms, lending weight to the argument that there's an inherent duty to protect and restore when breaches occur.

Returning to the present matter, META's obligation was not merely to protect, but also, at a minimum, to cooperate with Plaintiffs in the restoration of their account. The failure by META to provide mechanisms allowing Plaintiffs to reclaim their Facebook account, coupled with the allowance for the Foreign and Doe Defendants to control Plaintiffs' Facebook account

1 and SENATE page, is a glaring breach of said duty. The consequences of this negligence are
2 profound. Plaintiffs are hindered by the inability to retrieve cherished memories, photographs
3 stored on their page, and the palpable detrimental impact this situation has on Plaintiff's U.S.
4 Senate campaign. The full scope of the damages from this hack, including distorted messages
5 on Plaintiffs pages, to loss of donations and supporters due to FOREIGN COMPANY and Doe
6 Defendants' interference and META's negligence, remains to be ascertained.

8 **B. The Plaintiffs Are Likely To Prevail on Their Violation Of The Computer Fraud And
9 Abuse Act (CFAA) Count**

10 The Computer Fraud and Abuse Act (CFAA), 18 U.S.C. § 1030(a)(2), is clear in its
11 prohibition of unauthorized access to computer systems and the obtaining of information from
12 such systems. Defendant, by failing to secure Plaintiff's account from unsanctioned access and
13 neglecting to reinstate Plaintiff's access, has failed to maintain the necessary and legally
14 mandated protections, making a breach of the CFAA evident.

16 Courts have routinely found violations of the CFAA where there's unauthorized access
17 or excess of authorized access and consequential damage or loss. In the seminal case of **LVRC
18 Holdings LLC v. Brekka, 581 F.3d 1127 (9th Cir. 2009)**, the Ninth Circuit highlighted the
19 importance of "authorization" in the context of the CFAA, emphasizing that entities providing
20 access to electronic information should ensure secure and limited access.

22 In this instance, META, despite its vast resources and capabilities, has allowed
23 unsanctioned access to Plaintiff's account, failing to uphold its obligations under the CFAA.
24 Furthermore, its inability or unwillingness to restore Plaintiff's rightful access, combined with
25 the misuse and damage caused by unauthorized users, amplifies the violation.

27 \\
28

1 Given the clear wording of the CFAA, Defendant's actions, and the prevailing
2 jurisprudence on this matter, Plaintiff is likely to succeed on the merits of this count.
3 Therefore, the court should weigh this high likelihood of success when considering Plaintiff's
4 request for relief.
5

6 **C. The Plaintiffs Are Likely To Prevail on Their Claim of Breach Of Contract And**
7 **Violation Of The Stored Communications ACT**

8 META, through its Facebook platform, entered into a contractual relationship with the
9 Plaintiff when Plaintiff agreed to the platform's Terms of Service. These terms are not mere
10 platitudes but form binding commitments. Key among these terms, as evidenced in the
11 aforementioned excerpt, is META's obligation to "promote safety, integrity, and security" and
12 to "verify accounts and activity" as well as to "detect, prevent and combat harmful or unlawful
13 behavior."
14

15 In **Specht v. Netscape Communications Corp., 306 F.3d 17 (2nd Cir. 2002)**, the
16 court reaffirmed the principle that online agreements can be as binding as traditional paper
17 contracts. Users' assent to be bound by such terms is typically manifested by their continued
18 use of a platform. In return, companies like META must honor their stipulated obligations.
19

20 In the present matter, META's inaction and inability to restore Plaintiffs' access and its
21 failure to safeguard against unauthorized access are clear breaches of its contractual
22 obligations. META's own Terms of Service (Exhibit 6) corroborate Plaintiff's rightful
23 expectation of protection against such intrusions.
24

25 Furthermore, the Stored Communications Act (SCA), 18 U.S.C. § 2701(a), is explicit in its
26 prohibition against unauthorized access to stored communications. Defendant's negligence in
27 this regard compounds its breach of contract with a statutory violation.
28

1 Given the explicit terms set forth in META's Terms of Service and the mandates of the
2 SCA, combined with Defendant's evident failure to uphold both, Plaintiff has a substantial
3 likelihood of success on the merits of this count. It is incumbent upon the court to factor in this
4 high likelihood of success when contemplating Plaintiff's request for relief.
5

6 **D. The Plaintiffs Are Likely To Prevail on Their Claim of Trespass To Chattels**

7 Trespass to chattels occurs when one party intentionally interferes with another party's
8 personal property. Plaintiffs' loss of access to their Facebook account constitutes a significant
9 deprivation of their proprietary rights. In the seminal case, **eBay, Inc. v. Bidder's Edge, Inc.**,
10 **100 F.Supp.2d 1058 (N.D. Cal. 2000)**, the court recognized unauthorized electronic intrusions
11 as trespass to chattels. Given the Defendants' actions, Plaintiffs are highly likely to prevail on
12 this count.
13

14 **E. The Plaintiffs Are Likely To Prevail On Their Claim Of Fraud And Misrepresentation**

15 Plaintiffs' claim here is grounded in the classic elements of fraud: a misrepresentation,
16 made with knowledge of its falsehood, intended to induce another's reliance, which causes
17 justifiable reliance and damage. Defendants' misrepresentation of identity satisfies these
18 elements, bolstering Plaintiffs' likelihood of prevailing on this count.
19

20 **F. The Plaintiffs Are Likely To Prevail on Their Claim of Privacy Violations**

21 Privacy rights, especially in the realm of digital spaces, have gained heightened
22 importance. As reflected in the **Restatement (Second) of Torts § 652B**, unwarranted intrusion
23 into another's seclusion constitutes a violation of this right. Given the unauthorized access and
24 dissemination of Plaintiffs' private information, they are well-positioned to prevail on this
25 count.
26

27 \\
28

- 1 • **Privacy Violations:** The unauthorized access and dissemination of Plaintiffs' private
2 information stand in violation of privacy rights delineated in the **Restatement (Second)**
3 **of Torts § 652B.**
- 4 • **Election Interference:** Defendants' manipulation of Plaintiffs' Campaign Page
5 jeopardizes the sanctity of the electoral process, making Plaintiffs' claims on this count
6 especially potent.
7

8 The abovementioned (alongside other) claims underscore Plaintiffs' significant likelihood of
9 success on the merits.

10 **II. Substantial Threat of Irreparable Injury**

11 Plaintiffs have been wrongfully deprived of access to their personal and campaign
12 Facebook accounts. This deprivation has led to a multitude of profound and irreparable
13 consequences:
14

- 15 • **Loss of Personal Content:** Plaintiffs have lost access to cherished memories, valuable
16 photographs, conversations, and personal data meticulously curated over the years.
17 Such an irreplaceable repository of life's moments cannot be quantified or adequately
18 compensated for in monetary terms.
- 19 • **Campaign Disruption:** The denial of access has robbed Plaintiffs of invaluable
20 campaign resources, crucial communications, outreach plans, and documented
21 strategies, severely hampering their electoral prospects. Plaintiff has a Podcast starting
22 on November 4th, 2023 and cannot stream her Podcast live on Facebook, which is
23 where many voters watch political live streams.
24
25

26 \\
27 \\
28

- 1 • **Emotional Distress:** The lingering uncertainty about the nature and extent of data
2 manipulation, misuse of private information, and public misrepresentation causes
3 considerable emotional and psychological distress to the Plaintiffs.
4
- 5 • **Lost Campaign Visibility:** Plaintiffs recently gave an interview that garnered
6 significant attention on Facebook, boasting over 80,000 views in just two days.
7 Plaintiffs pages were tagged by the host, however, the pages tagged are being
8 controlled by this FOREIGN COMPANY. This traction, vital for raising campaign
9 awareness, has been unjustly co-opted by the fraudulent page controlled by FOREIGN
10 COMPANY, allegedly based in Vietnam.
11
- 12 • **Redirection of Campaign Traffic:** Instead of channeling supporters to the legitimate
13 campaign website, traffic is being misleadingly routed to an unauthorized website. Such
14 redirection can distort public perception and erode the authenticity and trustworthiness
15 of Plaintiffs' campaign.
16
- 17 • **Financial Prejudice:** There's a tangible threat of financial misappropriation. Donors,
18 thinking they are supporting the Plaintiffs, might be defrauded into contributing to
19 unauthorized and malicious entities. This not only diminishes the campaign funds for
20 Plaintiffs but poses a risk to well-intentioned donors.
21
- 22 • **Diminishing Public Trust:** Every moment that this fraudulent page remains active, the
23 public's trust is jeopardized. Supporters and the general electorate may grow skeptical
24 of Plaintiffs' legitimacy, given the visible anomalies in their online presence.
25
- 26 • **Further Exploitation:** The prolonged inaction by Facebook despite multiple requests
27 heightens the risk of further malicious activities by these hackers. There is no assurance
28

1 that the scope of their exploitation is limited to Facebook or that they won't escalate
2 their nefarious activities.

- 3
- 4 • **Public Deception:** The general public, unaware of the underlying manipulation, are at
5 risk of being deceived, misinformed, or exploited by the content and representations
6 made by these hackers.

7 Given the constellation of these severe and multifaceted injuries — many of which are
8 intangible and cannot be easily redressed through subsequent remediation or monetary
9 compensation — the harm is distinctly and overwhelmingly irreparable. Immediate
10 intervention is paramount to not only safeguard the Plaintiffs' rights and interests but also to
11 protect the unsuspecting public from further deception and exploitation.
12

13 **III. Balance of Hardships**

14 The impending injury to the Plaintiffs, should the injunction be denied, is both
15 profound and multifaceted. They face the permanent loss of personal data, a heightened state of
16 emotional distress stemming from the unauthorized access and misuse of their information, and
17 tangible, escalating damage to a critical U.S. Senate Campaign.
18

19 A particular point of concern is Plaintiff's recent interview shared on Facebook, which,
20 within a mere two days, saw an exceptional viewership of over 80,000 views. The benefits of
21 such visibility, which could have substantially elevated the "Ronda Kennedy for Senate"
22 campaign, are now squandered. Even more alarming, the links on the compromised page pose
23 a real risk of deceiving and defrauding the numerous visitors. Such malfeasance extends the
24 harm beyond the Plaintiffs, ensnaring unsuspecting individuals who might be preyed upon by
25 this hacking entity.
26

27 \\
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1 Contrastingly, the potential hardships for the Defendants if the injunction is granted are,
2 at most, minimal. While they might posit concerns of administrative burdens or potential
3 disruptions to their operations, these are ephemeral and logistical in nature. When measured
4 against the irreversible harm and widespread impact faced by the Plaintiffs and the general
5 public, the Defendants' potential inconveniences are vastly outweighed.
6

7 In sum, the balance of hardships is decidedly skewed in favor of the Plaintiffs. Their
8 immediate and continued suffering, if relief is not granted, is of a magnitude that far surpasses
9 any operational concerns the Defendants might experience as a result of the injunction.
10

11 **IV. Grant of an Injunction and the Public Interest**

12 Protecting the sanctity of the electoral process, ensuring the safety of personal data, and
13 championing the cornerstone of privacy rights are all undeniably in the paramount interest of
14 the public. By granting an injunction in this case, the Court would not merely be addressing the
15 harm done to the Plaintiffs; it would be making a resolute stand against unauthorized cyber
16 breaches and affirming the invaluable principle of electoral fairness. Such a proactive stance
17 not only safeguards individual rights but also reinforces societal values that are at the heart of
18 our democratic system.
19

20 Furthermore, in an era where digital interactions and online platforms play a pivotal
21 role in shaping public opinion and facilitating political engagement, the preservation of trust in
22 these platforms is crucial. An injunction would serve as a necessary reminder to tech entities
23 about their responsibilities in ensuring user trust and security. It would also act as a deterrent
24 against potential future malefactors seeking to exploit digital platforms for nefarious purposes.
25

26 Additionally, the wider public benefits from the reinforcement of standards that
27 prioritize data security and user rights, making platforms safer for everyone. Thus, beyond the
28

1 immediate redressal of the Plaintiffs' grievances, the Court's intervention would have a rippling
2 positive impact on millions of other users.

3 Given the compelling nature of the arguments presented and the clear satisfaction of
4 each criterion laid out in the Ladd v. Livingston framework, the Plaintiffs earnestly implore the
5 Court to favorably consider and grant their motion for a preliminary injunction.
6

7 **Conclusion: The Court Should Grant a Three-Phase Preliminary Injunction.**

8 The Plaintiffs and Plaintiffs supporters are experiencing ongoing irreparable harm. *Elrod*, 427
9 U.S. at 373.

10 Plaintiffs, Ronda Baldwin-Kennedy, Ronda Kennedy For Congress 2020, and Ronda
11 Kennedy for Senate (hereinafter referred to as "Plaintiffs"), humbly entreat this Court for the
12 issuance of a preliminary injunction against the named Defendants. The gravity of the situation
13 necessitates that Defendants immediately restore the Plaintiffs' Facebook page to its pristine
14 state before the unauthorized intrusion occurred.
15

16 As meticulously detailed in the Plaintiffs' Memorandum in Support of Motion for
17 Preliminary Injunction, the justification for granting a preliminary injunction is glaring. This
18 step is pivotal not only to mitigate the profound irreparable damages being experienced but
19 also to uphold the public's unwavering trust in a political election process that remains
20 impervious to foreign interference or any other external malevolent influences.
21

22 In alignment with the dire need for swift and comprehensive remedies, Plaintiffs
23 respectfully urge this Court to execute a preliminary injunction in the following phased
24 manner:
25

26 \\
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28

- 1 1. **Immediate Restoration:** The first phase necessitates the immediate restoration of the
2 Plaintiffs' personal Facebook of "Ronda Baldwin-Kennedy" and Campaign Facebook
3 page "Ronda Kennedy for Senate" formally known as "Ronda Baldwin-Kennedy for
4 Congress 2020", with all content, followers, and settings intact, ensuring no data loss or
5 alteration has occurred since the unauthorized access. Allowing Plaintiffs to have full
6 control over the above-mentioned pages and accounts.
7
- 8 2. **Audit and Assurance:** The second phase should involve Facebook conducting an
9 independent and comprehensive audit of the Plaintiffs' Facebook page and associated
10 accounts to identify and rectify any concealed breaches, unauthorized changes, or
11 potential vulnerabilities. This step will ensure that all malicious activities are
12 thoroughly eradicated, and the account's integrity is uncompromised.
13
- 14 3. **Oversight and Monitoring:** The third phase should instate a monitoring mechanism
15 for a predetermined period, ensuring that any recurrent unauthorized activities are
16 immediately detected and addressed. This will serve as both a deterrent for future
17 breaches and a reassurance to the Plaintiffs and their supporters of the account's
18 security.
19

20 Furthermore, to ensure the full extent of justice, Plaintiffs also request the Court to mandate
21 the Defendants to provide a detailed report elucidating the nature and extent of the breach,
22 identifying any other compromised areas, and specifying the measures they have undertaken to
23 fortify security and prevent similar incidents in the future.
24

25 \\
26 \\
27 \\
28

1 In the face of the apparent and escalating harm to the Plaintiffs, and considering the
2 overarching public interest in safeguarding the democratic process, the Plaintiffs fervently
3 hope the Court will grant the requested remedies promptly.
4

5
6 Respectfully Submitted,

7 Ronda Baldwin-Kennedy

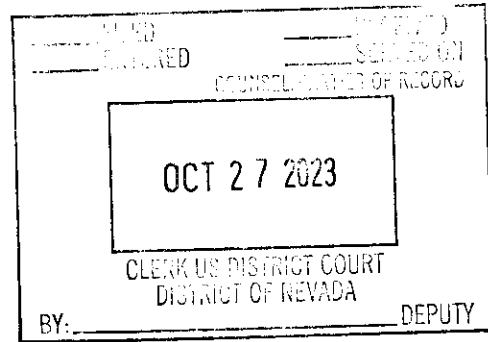
8 Date: October 27, 2023

9 /s/ Ronda Baldwin-Kennedy
Ronda Baldwin-Kennedy

10 Pro Per
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1 RONDA BALDWIN-KENNEDY, ESQ.
2 3301 Spring Mountain Rd. Unit 16
3 Las Vegas, NV 89102
4 Telephone: (805) 358-9737
5 Facsimile: (702) 974-0147

6 Pro Per Plaintiff



7 UNITED STATES DISTRICT COURT
8
9 FOR THE DISTRICT OF NEVADA

10 RONDA BALDWIN-KENNEDY AND
11 RONDA KENNEDY FOR SENATE.

12 *Plaintiff(s)*,

13 vs.

14 META PLATFORMS, Inc., d/b/a
15 FACEBOOK and INSTAGRAM, a
16 corporation. HOANG HAI MOBILE, a
17 Vietnamese Company, Doe's 1-10.

18 *Defendants(s)*

Case No.:

19 PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

20
21 Plaintiffs, Ronda Baldwin-Kennedy, Ronda Kennedy For Congress 2020 and Ronda Kennedy
22 for Senate (collectively, "Plaintiffs"), respectfully move this Court to grant a preliminary
23 injunction against Defendants, ordering Defendants to immediately restore Plaintiffs Facebook
24 page to its condition prior to hack. For the reasons stated in Plaintiffs' Memorandum Points of
25 Authority and attached exhibits in Support of Motion for Preliminary Injunction, which is filed
26 separately and incorporated by reference herein, the Court should enter a preliminary
27

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

1 injunction to address the grave irreparable harms and to vindicate the public interest in a
2 political election process free and clear of Foreign Election interference.

3 For the reasons stated in Plaintiffs' Memorandum, Plaintiffs respectfully request that this Court
4 enter a preliminary injunction in three phases:
5

- 6 1. **(1) Immediate Restoration:** The first phase necessitates the immediate restoration of
7 the Plaintiffs' personal Facebook of "Ronda Baldwin-Kennedy" and Campaign
8 Facebook page "Ronda Kennedy for Senate" formally known as "Ronda Baldwin-
9 Kennedy for Congress 2020", with all content, followers, and settings intact, ensuring
10 no data loss or alteration has occurred since the unauthorized access. Allowing
11 Plaintiffs to have full control over the above-mentioned pages and accounts.
12
- 13 2. **Audit and Assurance:** The second phase should involve Facebook conducting an
14 independent and comprehensive audit of the Plaintiffs' Facebook page and associated
15 accounts to identify and rectify any concealed breaches, unauthorized changes, or
16 potential vulnerabilities. This step will ensure that all malicious activities are
17 thoroughly eradicated, and the account's integrity is uncompromised.
18
- 19 3. **Oversight and Monitoring:** The third phase should instate a monitoring mechanism
20 for a predetermined period, ensuring that any recurrent unauthorized activities are
21 immediately detected and addressed. This will serve as both a deterrent for future
22 breaches and a reassurance to the Plaintiffs and their supporters of the account's
23 security.
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Respectfully Submitted,

Date: October 27, 2023

/s/ Ronda Baldwin-Kennedy
Ronda Baldwin-Kennedy

Pro Per

CERTIFICATE OF SERVICE

I hereby certify that, on October 27, 2023, I caused a true and correct copy of the Motion for Preliminary Injunction, supporting Memorandum Points of Authorities and supporting Declaration of Ronda Kennedy to be filed with the Court, I caused a true and correct copy of the foregoing to be sent by mail to all Defendants at the following addresses:

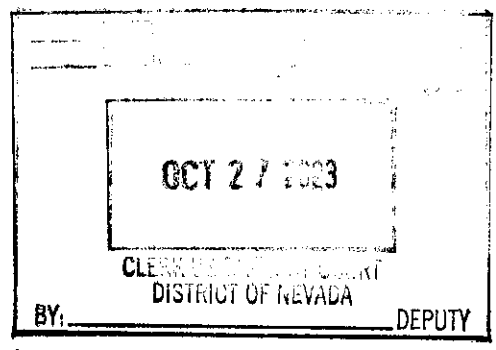
META PLATFORMS, Inc
1601 Willow road
Menlo Park, CA 94025

META PLATFORMS, Inc
Registered Agent
1505 Corporation CSC
LAWYERS INCORPORATING SERVICE
BECKY DEGEORGE
2710 GATEWAY OAKS DRIVE,
SACRAMENTO, CA

/S/ Ronda Kennedy

1 RONDA BALDWIN-KENNEDY, ESQ.
2 3301 Spring Mountain Rd. Unit 16
3 Las Vegas, NV 89102
4 Telephone: (805) 358-9737
5 Facsimile: (702) 974-0147

6 Pro Per Plaintiff



7 UNITED STATES DISTRICT COURT
8
9 FOR THE DISTRICT OF NEVADA

10 RONDA BALDWIN-KENNEDY AND
11 RONDA KENNEDY FOR SENATE.

12 *Plaintiff(s),*

13 vs.

14 META PLATFORMS, Inc., d/b/a
15 FACEBOOK and INSTAGRAM, a
16 corporation. HOANG HAI MOBILE, a
17 Vietnamese Company, Doe's 1-10.

18 *Defendants(s)*

Case No.:

19
20
21 **DECLARATION OF RONDA KENNEDY**

- 22 1. I, Ronda Kennedy, am over the age of 18.
23 2. I make this Declaration based on personal knowledge.
24 3. Beginning in 2020 until my page was hacked, I maintained very active Campaign Social
25 Media accounts including Facebook where I am verified. I have followers from all over the
26 United States.
27

1 4. For the first time, I have not been able to interact on Facebook since June 8, 2023 missing
2 valuable interactions with supporters.

3 5. I have not been able to receive direct messaging from supporters who contact me on
4 Facebook. Supporters at times would provide private information about themselves and that
5 information is now in the hands of foreign actors.
6

7 6. I have sent emails and other communications to Meta attempting to gain control of my pages
8 back.

9 7. I have maintained a personal Facebook page since 2003 and created other pages controlled
10 by my personal page. The Kennedy Triplets is one such page. This page documented my triplet
11 pregnancy, my three months in the hospital and the birth of the triplets. I documented their first
12 birthday party their first steps. So many memories of their life is now lost to me.
13

14 8. Through this action, I have been deprived of my voice on Facebook, carrying negative
15 implications for my personal, professional and political life.

16 9. This action has harmed me personally, politically and professionally. I developed a network
17 of thousands of political supporters who followed listened to me and donated to my political
18 campaign. I would be tagged by other politicians including members of Congress, which in
19 turn would increase my political presence. Now I have been silenced and cut off from all of
20 them, with no viable way of getting that network back or promoting my campaign.
21

22 10. Facebook is widely used by policymakers, academics, journalists as a proxy for popular
23 opinion, I am excluded from these discussions on Facebook. Politicians, including my
24 opponents in the Senate race, use Facebook to engage and comment on these popular opinions.
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1 I am also excluded from expressing my comments on these opinions on Facebook making it
2 seem I'm not interested in the issues.

3 11. In addition to Twitter, I regularly use the following technology platforms: Facebook,
4 Amazon, Reddit, Google, YouTube, Instagram, and LinkedIn.

5 12. I swear or affirm under penalty of perjury that the foregoing is true and correct.
6
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9

10 Date: October 27, 2023

/s/ Ronda Baldwin-Kennedy
Ronda Baldwin-Kennedy

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12 Pro Per
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PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION