

FILED  
NOV 2 2015  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
DEPUTY

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

Hamik Sayadian \*

10458 Petersboro Road

Woodstock, MD 21163 \*

*(Full name and address of the plaintiff)*  
**Plaintiff(s)**

vs. \*

FACEBOOK INC.

1 Hacker Way

Menlo Park, CA 94205 \*

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ \*

*(Full name and address of the defendant(s))*  
**Defendant(s)**

\*  
\*\*\*\*\*

**GLR 15 CV 3339**

Civil No.: \_\_\_\_\_  
*(Leave blank. To be filled in by Court.)*

**COMPLAINT**

1. Jurisdiction in this case is based on:

- ☒ Diversity (none of the defendants are residents of the state where plaintiff is a resident)
- ☒ Federal question (suit is based upon a federal statute or provision of the United States Constitution)
- ☐ Other (explain) \_\_\_\_\_





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3. The relief I want the court to order is:

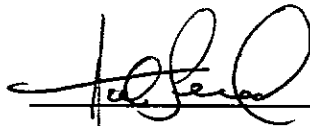
☒ Damages in the amount of: ~~\$50,000,000~~ \* (\$50,000,000)

☒ An injunction ordering: Facebook to stop hacking into Plaintiffs  
cellular-phone, immediately.

☐ Other (explain) \_\_\_\_\_  
\_\_\_\_\_

October 13, 2015  
(Date)

Hamik Sayadian



10458 Petersboro Road

Woodstock, MD 21163

(410) 428-0902

### Privacy Rules and Judicial Conference Privacy Policy

Under the E-Government Act and Judicial Conference policy, any paper filed with the court should not contain an individual's social security number, full birth date, or home address; the full name of person known to be a minor; or a complete financial account number. These rules address the privacy concerns resulting from public access to electronic case files.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

HAMIK SAYADIAN  
10458 Petersboro Rd.  
Woodstock, MD 21163

v.

FACEBOOK INC.  
1 Hacker Way  
Menlo Park, CA 94205

\*\*\*\*\*

### Complaint

1. Complaint for violation of the Maryland Personal Information Act, Title 18 of the United States

Code, The Fourth Amendment Right to Privacy and the Computer Fraud and Abuse Act

### Jurisdiction

1. This Court has jurisdiction over defendant pursuant to MD Code, Cts and Jud. Procedure Sec. 6- () j s g r

### Venue

1. Venue is proper pursuant to MD. Code, Cts. Sec. 6-201 in this county because of Defendant's

habitual activity in this county.

### Parties

1. Plaintiff is a resident of the State of Maryland, residing at 10458 Petersboro Rd. Woodstock, MD.

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2. Defendant, Facebook Inc., is incorporated in California and has its corporate headquarters in California.

First Cause of Action-MD PIPA Sec. 14-3504

1. There was a deceptive practice of acquiring unauthorized information when Facebook hacked into

Plaintiff's cellular phone.

2. The Plaintiff's personal contacts and text messages constitute personal information.

3. The hacking of Plaintiff's phone compromises the security, confidentiality and integrity of Plaintiff's

personal information.

Second Cause of Action-U.S. Code Sec. 1028

1. The Plaintiff did not give authorization to Facebook to use the application on his cellular phone

to search through his telephone.

2. Defendant knowingly possessed the tools to enter Plaintiff's cellular phone, and transfer

information for its benefit.

3. Defendant acquired private information with the intent to use the information for its own benefit.

Third Cause of Action-U.S. Code, Sec. 1029

1. Defendant knowingly acquired access to Plaintiff's cellular phone and its applications.

2. Defendant, with intent to defraud, hacked into Plaintiff's cellular phone.

3. Defendant acquired control of Plaintiff's personal information without Plaintiff's express

agreement.

4. Defendant used this illegally obtained information from the device for its benefit.

#### Fourth Cause of Action-U.S., Code Sec 1030

1. Defendant knowingly accessed Plaintiff's cellular phone, computer.

2. Defendant accessed information in Plaintiff's cellular phone without authorization.

3. Once inside the computer, Defendant furthered the fraud by accessing and downloading

protected information.

4. The acquired information was of value to the Defendant and was used to procure financial gain

by the Defendant.

#### Fifth Cause of Action-U.S. Code., Sec. 2510

1. Defendant captured Plaintiff's confidential communications from his cellular phone.

2. Defendant's trespassory

actions into the cellular phone were not done with any court approval.

3. Plaintiff's cellular communications constituted a confidential electronic communication and were

protected under the Federal statutes.



Sixth Cause of Action- U.S. Code., Sec. 2511

1. Defendant intentionally intercepted Plaintiff's personal information from his cellular phone.
2. Defendant used the intercepted electronic communications for its own benefit.
3. Defendant intentionally disclosed this private information.

Seventh Cause of Action-Fourth Amendment of the United States Constitution

1. Defendant's procurement of protected information constitutes a seizure of personal information.
2. Plaintiff had a fundamental right to a reasonable expectation of privacy for the information in his  
  
personal cellular phone.
3. Plaintiff did not consent to this acquisition of information.
4. Defendant's seizure of personal information constituted an invasion of privacy through the

Fourteenth Amendment.

Eighth Cause of Action-Negligent Infliction of Emotional Distress

1. Defendant had a duty to avoid causing any emotional distress to its subscribers.
2. Defendant breached its duty when it invaded Plaintiffs personal cellular phone.
3. Defendants invasion of Plaintiffs privacy caused anxiety and embarrassment over the years of

encroachment that has taken place into the phone, and what other information may have been seen by

the Defendant.

WHEREFORE, Plaintiff requests Court award him the following relief:

1. Immediately stop the intrusion into Plaintiff's personal information on his cellular-phone and

all other devices.

2. Award Plaintiff damages for the intrusion on his personal device according to Federal fines.

3. Award Plaintiff damages accrued for any negligent infliction of emotional distress caused by

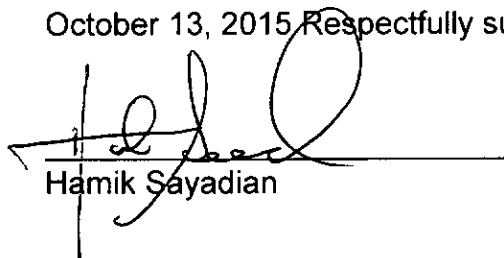
invasion of privacy in the amount of \$5,000,000.

4. Award Plaintiff damages for potential actual damages resulting from the theft of personal and business information in the amount of \$20,000,000.

5. Award Plaintiff punitive damages for the ongoing transfer of personal data acquired through hacking

into Plaintiff's cellular phone in the amount of \$50,000,000.

October 13, 2015 Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Hamik Sayadian', is written over a horizontal line. The signature is stylized with a large loop at the end.

Hamik Sayadian