

FILED

JUL 11 2019

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

TIMOTHY M. O'BRIEN CLERK
By CA Deputy

Kandance Wells)

_____)

(Enter above the full name of the Plaintiff(s))

vs.)

Case Number 19-2379-DDC-JPO

Facebook Incorporated)
Name)

_____)
Street and number)

_____)
City State ZipCode)

(Enter above the full name and address of the Defendant in this action - list the name and address of any additional defendants on the back side of this sheet).

CIVIL COMPLAINT

I. Parties to this civil action:

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any, on the back side of this sheet).

A. Name of plaintiff Kandance Wells

Address 10208 King's Cove Drive # 201

Merriam, KS 66203

(In item B below, write the full name of the defendant in the first blank. In the second blank, write the official position of the defendant. Use item C for the names and positions of any additional defendants).

B. Defendant Facebook Incorporated is employed at Facebook Incorporated

C. Additional Defendants ~~JD~~ Mark Zuckerberg
CEO - Facebook Incorporated

II. Jurisdiction:

(Complete one or more of the following subparagraphs, A., B.1, B.2., or B.3., whichever is applicable.)

A. (If Applicable) Diversity of citizenship and amount:

1. Plaintiff is a citizen of the State of Kansas.
2. The first-named defendant above is either
 - a. a citizen of the State of California; or
 - b. a corporation incorporated under the laws of the State of California and having its principal place of business in a State other than the State of which plaintiff is a citizen.
3. The second-named defendant above is either
 - a. a citizen of the State of California; or
 - b. a corporation incorporated under the laws of the State of California and having its principal place of business in a State other than the State of which plaintiff is a citizen.

(If there are more than two defendants, set forth the foregoing information for each additional defendant on a separate page and attach it to this complaint.)

Plaintiff states that the matter in controversy exceeds, exclusive of interest and costs, the sum of seventy-five thousand dollars (\$75,000.00).

B. (If applicable) Jurisdiction founded on grounds other than diversity (Check any of the following which apply to this case).

1. This case arises under the following section of the Constitution of the United States or statute of the United States (28 U.S.C. §1331): Constitution, Article _____, Section _____; Statute, US Code, Title _____, Section _____.

2. This case arises because of violation of the civil or equal rights, privileges, or immunities accorded to citizens of, or persons within the jurisdiction of, the United States (28 U.S.C. §1343).

3. Other grounds (specify and state any statute which gives rise to such grounds):

III. Statement of Claim:

(State here a short and plain statement of the claim showing that plaintiff is entitled to relief. State what each defendant did that violated the right(s) of the plaintiff, including dates and places of such conduct by the defendant(s). Do not set forth legal arguments. If you intend to allege more than one claim, number and set forth each claim in a separate paragraph. Attach an additional sheet, if necessary, to set forth a short and plain statement of the claim[s].)

① Defendants website uploaded internet cookies to plaintiff social media profiles that led to tracking, threats, and public backlash

② Defendants website mandates clauses that made plaintiff a victim to severe media and public relations tracking and lobbying

IV. Relief:

(State briefly exactly what judgement or relief you want from the Court. Do not make legal arguments.)

I am asking the courts to provide punitive damages to plaintiff, and stop media tracking in personal endeavors.

I would like the courts to eradicate such mandates^{clauses} that victimize users of this website for the protection of consumers

V. Do you claim the wrongs alleged in your complaint are continuing to occur at the present time? Yes No

VI. Do you claim actual damages for the acts alleged in your complaint? Yes No

VII. Do you claim punitive monetary damages? Yes No

If you answered yes, state the amounts claimed and the reasons you claim you are entitled to recover money damages.

\$ 93,000,000.00 My life was ruined by using this website. I have been a victim of severe mental anguish, public scrutiny, tracked, brutalized, blackballed and barred as a result of coming forward or suppressing allegations of torts committed

VIII. Administrative Procedures:

A. Have the ~~claims~~ which you make in this civil action been presented through any type of Administrative Procedure within any government agency?

Yes No

B. If you answered yes, give the date your claims were presented, how they were presented, and the result of that procedure:

C. If you answered no, give the reasons, if any, why the claims made in this action have not been presented through Administrative Procedures:

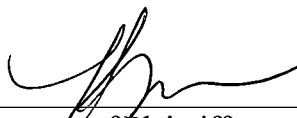
Badgering, entrapment, denied civil rights and
threatened as a result of attempting to resolve
the basis of this situation.

IX. Related Litigation:

Please mark the statement that pertains to this case:

This cause, or a substantially equivalent complaint, was previously filed in this court as case number _____ and assigned to the Honorable Judge _____.

Neither this cause, nor a substantially equivalent complaint, previously has been filed in this court, and therefore this case may be opened as an original proceeding.



Signature of Plaintiff

Kandance Wells

Name (Print or Type)

10208 King's Cove Drive, Merriam, KS

Address
66203

Merriam KS 66203
City State Zip Code

(816)656-9239
Telephone Number

DESIGNATION OF PLACE OF TRIAL

Plaintiff designates { Wichita, Kansas City, or Topeka }, Kansas as the
(Select One)
location for the trial in this matter.



Signature of Plaintiff

REQUEST FOR TRIAL BY JURY

Plaintiff requests trial by jury { Yes or No }
(Select One)



Signature of Plaintiff

Dated: 7/11/19
(Rev. 10/15)

General Information

Court	United States District Court for the District of Kansas; United States District Court for the District of Kansas
Federal Nature of Suit	Personal Injury - Assault[320]
Docket Number	2:19-cv-02379