

Exhibit A

INSTRUCTIONS: FILL IN THE BLANKS BELOW, THE INDEX NUMBER AND THE DATE THE INDEX NUMBER WAS PURCHASED. COMPLETE ALL BLANKS IN ACCORDANCE WITH THE DIRECTIONS SET FORTH IN BOLD PRINT. PRINT USING BLACK INK ONLY.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

RECEIVED

OCT 21 2021

**NASSAU COUNTY
COUNTY CLERK'S OFFICE**

-----x
Kassandra Ortiz
[YOUR NAME(S)]

Plaintiff(s),

Index No. _____/____

-against-

Date Index No.
purchased _____

GOOGLE LLC
[NAME OF PERSON(S) SUED]

SUMMONS

Defendant(s)
-----x

To the Person(s) Named as Defendant(s) Above:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the complaint of the plaintiff(s) herein and to serve a copy of your answer on the plaintiff(s) at the address indicated below within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the Summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer, a judgment will be entered against you by default for the relief demanded in the complaint.

Dated: 10/21/21, 2001
[DATE OF SUMMONS]

Kassandra Ortiz
[YOUR NAME(S)]
11 Shore Road Apt 1
Port Washington NY 11050

[YOUR ADDRESS (ES) and
PHONE NUMBER(S)]

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

-----X

Kasandra Ortiz Plaintiff,

Index No:

-against-

COMPLAINT

Google LLC Defendant.

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TO THE SUPREME COURT OF THE STATE OF NEW YORK

The complaint of the plaintiff, Kasandra Ortiz, respectfully shows and alleges as follows:

1. The plaintiff herein, Kasandra Ortiz, is a resident of the State of New York. Ms. Ortiz resides at 11 Shore Road, Port Washington, New York, 11050.
2. Google LLC, is an American multinational technology company that specializes in Internet-related services and products, which include online advertising technologies, a search engine, cloud computing, software and hardware.
3. On August 12, 2019 Plaintiff Ms. Ortiz, launched a illegal massage business; where she worked out of her apartment, providing body rubs to male clients and ended each session with masturbation.
4. On October 20, 2019: the website www.utopiaguide.pl; launched a Smear Campaign, against the Plaintiff: Kasandra Ortiz. The website appears to be designed, as an act of revenge against Sex Workers, who reject potential clients; which is illegal practice.
5. In the Plaintiffs case, The Smear Campaign is listed number one on Google's search engine, when her work number is typed in. It is seemingly, designed to

scare potential Clients out of seeing providers. Potential clients are encouraged, not to undergo the Screening Process, which allows providers to see clients safely.

6. In order for a Sting Operation to become successful, the Provider must agree to a price and a service; through phone, email or text exchange. On April, 13, 2020 at 5:45pm: a failed sting operation via email, against the Plaintiff took place.

7. On April 17, 2020 at 10:31am: an undercover officer: John David Risotto threatened the Plaintiff, with a warning; which stated that the members of Utopiaguide.pl are: "horrible people. Links to sex trafficking, gang behavior, stalking, possible murders. Google Utopia Guide CCC or Utopia Guide LISK to read for yourself". His statement, proved to be true.

8. On November 3, 2020: the Plaintiff decided to defend herself against the misogynistic comments. The decision caused her to become induced into a state of psychosis.

9. On November, 12, 2020 at 5:39pm: she received a racist email from Gregory Deboer; who works for the Justice department. The email states "you don't seem to be black nigger, nor white. I guess you are shit skin!" The plaintiff responded with Deboer's Linked-In, to let him know that she has identified him. After the email exchange, she became hyper- vigilant with the ideations that she was being stalked, by the police.

10. On November, 19, 2020: she visited Saint Francis Medical Center and an Acute Myocardial Infarction was detected. Saint Francis Medical Center, called the Police. Police officer "Babar" did not write a police report in her presence; and handed the Plaintiff a card with the report number: Pw-7118-20. It is important to note that, Saint Francis Medical Center; covered up the heart attack; with a diagnosis of Panic attack and palpitations, possibly, in order to protect the Police Gang Stalkers.

11. The Plaintiff has since, been hospitalized, three more times because of her mis-diagnosis of Bi-polar disorder with psychosis. Ms. Ortiz became suicidal and was subjected, to being poisoned with bipolar medications, Risperdal, Seroquel and Abilify. The Plaintiff has since been cleared of her bipolar diagnosis as of October 14, 2021; by the Nassau University Medical Center.

12. Prior to the hospitalization at the Nassau University Medical Center; the Plaintiff: Kasandra Ortiz, decided to quit Sex work to open her own Christian Ministry, which aims to get Sex Workers out of their profession. She noticed that her provocative pictures were uploaded on, www.hot.com and www.escorts-no-fakes.com; without her consent. She suspected it was uploaded by the Justice Department.

13. On August 10, 2021 at 12:16pm, she became furious and typed to Google LLC; a cease and desist email; warning Google to remove her revenge porn websites and images, off their search engines. Google responded with; "We did not find content that needs to be removed from search results according to our policies."

14. On October, 19, 2021: the Plaintiff: Ms. Ortiz requested to retrieve all of her medical records from Saint Francis Medical Center, Nassau University Medical Center and Brunswick Hospital Center; in order to prepare for the lawsuit.

15. When she arrived back into her apartment, at 5:04PM: Ms. Ortiz received an email from her sex work advertising platform www.tryst.com; stating that suspicious activity has been detected on her account. At 5:13 pm, she received another email from Tryst; stating that her email has been changed to graysonadrian179@gmail.com; rendering her Tryst account hacked.

16. On that same day: October, 19, 2019 at 5:19pm; Ms. Ortiz received an email from Twitter; stating that there was a new login, into her account; rendering her Twitter account hacked. The hacker impersonated Ms. Ortiz on her Twitter platform as

well as her Tryst account; and engaged in, acts of cyber revenge porn. The Plaintiff called the police. Once again, she was handed a card, with the report number: PW:6686-21. After the police left the Plaintiff's residence. She began to receive text messages on her work phone and on her personal Whatsapp from men soliciting prostitution

17. On October, 19, 2021: The Plaintiff: Ms. Ortiz regained access back into her Twitter account. She noticed that she was impersonated, in her Twitter inbox as well; and also, received explicit and threatening emails on her Twitter account.

18. On October, 19, 2021: The Plaintiff: Ms. Ortiz regained access back into her Twitter account. She noticed that she was impersonated, in her Twitter inbox as well; and also, received explicit and threatening emails on her Twitter account.

19. The Plaintiff; suspects that Google LLC hacked into her account; due to the circumstances that her Gmail account password; was at the time, identical to both Tryst and Twitter.com

20. In summary, Google LLC has violated, the human rights of Ms. Ortiz, by promoting the acts of cyberbullying, hate crime, revenge porn, mental abuse and attempted murder.

21. By reason of the facts and circumstances stated above, plaintiff is seeking \$50,000,000 in damages, for enabling both mental abuse and the heart attack, which took place.

WHEREFORE, the Plaintiff demands judgement against defendant in the sum of \$50,000,000 plus interest, together with any other relief the court finds to be just and proper.

Dated: October 20, 2021



Kasandra Ortiz
Plaintiff

11 Shore Road Apt 1
Port Washington NY, 11050
609-369-2019

VERIFICATION

Kasandra Ortiz, being duly sworn, deposes and says:

I am the plaintiff in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief as to those matters I believe to be true.



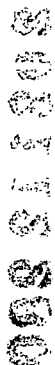
X _____
Kasandra Ortiz
Plaintiff

State of New York
County of Nassau

Sworn to before me this 21st day of
October 2021



SAMANTHA FERMAN
Notary Public, State Of New York
No. 04FE8363144
Qualified In Nassau County
Commission to expire 8/14/2025



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