

UNITED STATES DISTRICT COURT
for the
Northern District of Georgia
Civil Division

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

AUG 09 2024

KEVIN P. WEIMER, Clerk
By: *[Signature]* Deputy Clerk

LOUIS L. LIGON III,
personal and Georgia State
Senate District 7 candidate
PLAINTIFF,

VS.

META PLATFORMS, INC.,d/b/a,
FACEBOOK OPERATIONS, LLC,
INSTAGRAM, LLC,
DEFENDANTS

1:24-CV-3540
Civil Action No. _____

Jury Trial Demanded

COMPLAINT AND REQUEST FOR INJUNCTION

Comes Now Plaintiff, Louis L. Ligon III, and files this complaint and request for injunctive relief against Defendants, Meta Platforms, Inc. d/b/a/ Facebook Operations, LLC and Instagram, LLC.

Plaintiff:

Louis L. Ligon III

3555 Grovecrest Way

Duluth, Georgia, 30096 (Gwinnett County)

LigonForLiberty@gmail.com / (404) 966-2708

Defendants:

META PLATFORMS, INC.,

Principle Office: 1 Hacker Way, Menlo Park, California 94025

(San Mateo County)

dba, FACEBOOK OPERATIONS, LLC, and INSTAGRAM, LLC, c/o,

Corporation Service Company, (Foreign Entity Registered Agent)

2 Sun Court, Suite 400 Peachtree Corners, Georgia 30092

(Gwinnett County)

I. Basis for Jurisdiction

Under 28 U.S.C. § 1332, diversity of citizenship:

- A.** Plaintiff is a citizen and resident of Duluth, Georgia 30096.
- B.** Defendants, Meta Platforms Inc., Facebook Operations LLC., and Instagram LLC, are incorporated under the laws of the State of California, and has its principal place of business in the State of California.
- C.** This Court has jurisdiction under the Constitution, 28 U.S.C. § 1331, and

42 U.S.C. §§ 1985, 1986, as this case arises out of Defendants' violation of the First Amendment and of the Civil Rights Act of 1871 as alleged herein.

II. Statement of Claim

As and for their Complaint herein, Plaintiff states and alleges as follows:

1. This is a deprivation of citizens civil rights and personal "right to contract", "freedom of speech", as well as a Georgia State Senate campaign election interference case by Defendants.
2. May 6th,2024- Plaintiff filed a mandatory signed and notarized "Verification of Identity" form with Meta (Facebook) as required by Meta's advertising policies in order to run political campaign ads on Facebook.

(EXHIBIT A)

3. March 7th,2024- Plaintiff officially registered with the Republican Party of Georgia and the Georgia Secretary of State's office to run for Georgia State Senate, District 7. (EXHIBIT B)
4. May 8th- Plaintiff received a verification code letter from Meta via USPS to enter on the Meta (Facebook) political campaign advertising verification website as additional identity vetting. (EXHIBIT C)
5. May 9th,2024- Plaintiff created (6) political campaign ads to be shown for (10) days on Facebook to approximately (150k) possible voting constituents residing in Plaintiffs Georgia State Senate District 7. Early voting commenced on May 10th, 2024 with the main statewide election day being May 21st, 2024.

6. Meta (Facebook) charged Plaintiff (\$653.00) for advertising fees for the (6) campaign advertisements and verified, approved, populated and scheduled the campaign ads to run on Facebook for 10 days.

COUNT ONE: VIOLATION OF THE FIRST AMENDMENT

7. Meta (Facebook) ran the campaign ads partially overnight and then early the next morning of May 10th, 2024 with no warning sent Plaintiff (5) different emails from various unknown people representing Meta, Facebook, and Instagram stating that Plaintiff's election campaign ads were stopped for violating Meta, Facebook and Instagram community standards. The emails also stated that Plaintiff's Georgia State Senate campaign ads as well as Facebook State Senate candidate campaign page would be permanently suspended in 24 hours.

8. Plaintiff immediately answered and appealed all (5) Meta, Facebook, and Instagram emails responding to each email within 24 hours and again a second time requesting that Defendants show any specific violations and Plaintiff would correct any problem immediately. No response from Meta, Facebook, or Instagram whatsoever. Plaintiff's (6) Georgia State Senate election campaign advertisements and Facebook campaign page was permanently suspended with no explanation. Yet, the very same campaign election advertisements and election campaign pages continue to be shown on other impartial social media platforms, "X" and "Truth Social" with no complaints or problems at all.

(EXHIBIT D-1 to D-4)

9. Georgia State Senate Facebook Campaign Page: (EXHIBIT E)

<https://www.facebook.com/voteLigonForLiberty/>

10. Georgia State Senate Campaign Website: (EXHIBIT F)

<https://ligonforliberty.republican/>

11. Meta (Facebook) also with no explanation suspended and permanently deleted Plaintiff's personal Facebook profile page, (Louis Ligon Page) of 16 years with (687) friends and (156) followers. This also deleted Plaintiff's access and key role as an administrator of several other important Facebook groups. Defendants have caused great and irreparable harm to Plaintiff as Plaintiff's personal Facebook account has irreplaceable family photographs, years of other photograph memories, valuable materials, narrative content, and irreplicable communication channels. Plaintiff contends that he has been deprived from accessing Facebook account based on alleged violations that did not occur but instead were based on Meta, Facebook, and Instagram's inherent bias and discrimination based on a citizen's political affiliation, creed, and viewpoints.

12. May 21st, 2024 Plaintiff filed an official Georgia State Senate campaign election interference complaint against Meta, Facebook, and Instagram with Brad Rathensperger, Georgia Secretary of State and the Georgia State Election Board. (EXHIBIT G)

13. At the heart of the First Amendment lies the principle that each person should decide for him or herself the ideas and beliefs deserving of

expression, consideration, and adherence. Our political system and cultural life rest upon this ideal. See *Leathers v. Medlock*, 499 U.S., at 449, 111 S. Ct., at 1444-1445 (citing *Cohen v. California*, 403 U.S. 15, 24, 91 S. Ct. 1780, 1787-1788, 29 L.Ed.2d 284 (1971)); *West Virginia Bd. of Ed. v. Barnette*, 319 U.S. 624, 638, 640-642, 63 S. Ct. 1178, 11885, 1186-1187, 87 L. Ed. 1628 (1943).

COUNT TWO: VIOLATION OF 42 U.S.C. § 1985

14. In violation of the First Amendment, of civil rights law dating back to the Civil War, and of the American people's fundamental right to an election decided by voters, not by trillion-dollar corporations, the social media giant Meta Platforms is brazenly censoring speech by 42 U.S. Code § 1985 - Conspiracy to interfere with civil rights if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators.

15. Section 1985(3) provides a remedy for a conspiracy to interfere with civil rights. See 42 U.S.C. § 1985(3). To state a claim under § 1985(3), a plaintiff must allege: (1) a conspiracy; (2) for the purpose of depriving a person or class of persons of the equal protection of the laws, or of equal

privileges and immunities under the laws; and (3) an act in furtherance of the conspiracy, (4) resulting in an injury to person or property, or a deprivation of any right or privilege of a citizen of the United States.

Childree v. UAP/GA AG CHEM, Inc., 92 F.3d 1140, 1146-47 (11th Cir.)

16. To prove the second element, the plaintiff must show that the deprivation of rights or privileges occurred as a result of "some racial, or... otherwise class-based, invidiously discriminatory animus behind the conspirators' actions." *Id.* at 1147 (quotations omitted).

17. Nor can they in concert seek to injure any citizen, whether the injury is to person or property, on account of having engaged in support or advocacy. See 42 U.S.C. § 1985(3).

18. The Civil Rights Act of 1871 is one of the fundamental statutory guarantors of American democracy, and anyone who violates its provisions can be sued for both damages and injunctive relief.

19. Moreover, anyone who knows that such violations are occurring and has the power to prevent those wrongs or aid in preventing them, but refuses or neglects to do so, is equally in violation of the Civil Rights Act of 1871 and equally liable. See 42 U.S.C. § 1986.

20. Federal civil rights statutes that, like Section 1985, protect the right to participate freely in elections and prohibit private actors from conspiring to interfere in those elections by "threatening," "intimidating," or "injuring" citizens do not merely prohibit physical violence; they also prohibit the

online dissemination of false statements intended to prevent or dissuade citizens from exercising their rights.

COUNT THREE: VIOLATION OF 42 U.S.C. § 1986

21. In public, Meta declares: “We don't want to get in the way of open, public and democratic debate on Meta’s platform—especially in the context of elections in democratic societies like the United States. The public should be able to hear what their politicians are saying . . . so that they can make informed choices at the ballot box.”

22. But in its behind-closed-door censorship decisions, Meta pursues a different agenda, tilting the playing field. Facebook interfered in elections no less than 39 times since 2012 harming candidates by censoring content. Evidence shows that Facebook has repeatedly interfered in elections, overwhelmingly favoring Democrats since 2012. Defendants are brazenly censoring citizens' Right to free speech and inherent right to fully transparent free and fair elections, which is the very legal fabric of our great Democratic Republic. Plaintiff has now become yet another victim of election censorship and interference by Defendants as shown herein.

See MRC Free Speech America Special Report. . . . (EXHIBIT H)

23. Meta, Facebook, and Instagram and the country’s other dominant social media companies have done this for years—censoring millions of Americans. This is no mere litigant’s allegation; it is a fact established by copious discovery, documentary evidence, and admissions made in Meta’s

own internal emails, as found by the United States District Court of the Western District of Louisiana (the "District Court") and by the United States Court of Appeals for the Fifth Circuit. See *Missouri v. Biden*, No. 3:22-CV-01213, 2023 U.S. Dist. LEXIS 114585 (W.D. La. July 4 2023), *aff'd*, 83 F.4th 350, 371 (5th Cir. 2023).

24. Under Section 1986 of the Civil Rights Act of 1871, a person who knows that a Section 1985 wrong is "about to be committed," and who has the power "to prevent or aid in preventing the commission thereof," acts unlawfully if he "neglects or refuses to do so." 42 U.S.C. § 1986. 128.

Through its officers and employees, Defendants knew that all the Section 1985 wrongs described above were about to be committed and had power to prevent those wrongs and neglected or refused to do so.

25. Accordingly, Defendants Meta, Facebook, and Instagram, violated 42 U.S.C. § 1986 and are liable for all damage caused.

COUNT FOUR: VIOLATION OF 42 U.S.C. § 1981

26. 42 U.S. Code § 1981 - Equal rights under the law

Breach of Contract: The court must determine whether the factual allegations in complaint are sufficient to state a plausible claim for breach of contract. To prove a breach of contract, a plaintiff must establish "(1) a valid contract between the parties; (2) an obligation or duty arising from that contract; (3) a breach of that duty; and (4) damages caused by the breach." *Century Expl. New Orleans, LLC v. United States*, 110 Fed. Cl. 148,

163 (2013) (citing *San Carlos Irr. & Drainage Dist. v. United States*, 877 F.2d 957, 959 (Fed. Cir. 1989)). Once a breach of contract is established, the burden shifts to the defendant to plead and prove affirmative defenses that excuse performance. *Shell Oil Co. v. United States*, 751 F.3d 1282, 1297 (Fed. Cir. 2014) (citing *Stockton E. Water Dist. v. United States*, 583 F.3d 1344, 1360 (Fed. Cir. 2009)).

27. All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

28. The term “make and enforce contracts” includes the making, performance, modification, and termination of contracts, and the enjoyment of all benefits, privileges, terms, and conditions of the contractual relationship.

29. Protection against impairment: The rights protected by this section are protected against impairment by nongovernmental discrimination and impairment under color of State law.

III. Irreparable Injury

30. Georgia State Senate Election Interference claim. 42 U.S. Code § 1985 - Conspiracy to interfere with civil rights if one or more persons engaged

therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators. Defendants have brazenly violated the inherent civil rights of Plaintiff and have violated the Georgia State Senate District 7 residing citizens (198,000 constituents) the right to a free and fair, fully transparent choice of political candidates and state elections.

31. Meta Operations LLC, Facebook Platforms LLC, and Instagram LLC's actions were negligent and have proximately caused Plaintiff irreparable harm. Plaintiffs personal Facebook page, Instagram page, Georgia State Senate campaign pages and campaign advertisements contained valuable materials, photographs, personal and campaign videos, narrative content, privileged personal and Georgia State Senate communications channels, and group administrative links that Plaintiff has been deprived of accessing due to alleged violations that Plaintiff contends did not occur.

Meta, Facebook, and Instagram have offered no explanation for suspending Plaintiffs accounts even though Plaintiff demanded an explanation and example of what, if anything, needed to be corrected numerous times with no explanation or answer at all from Defendants.

32. Plaintiff claims general Compensatory damages in the amount of

\$184,500. Georgia State Senate Election Interference. The official salary of a Georgia State Senator is \$21,750.00 plus \$247.00 Per Diem. Average per year of \$41,000. Plus \$2500 in campaign expenses. Georgia State Senator serves a (2) year term. Therefore, $\$41k \times 2 = \$82k + \$2500 =$ damages of \$84,500. In addition, Plaintiff's personal Facebook profile page and links to various Facebook group administration pages were suspended with no explanation causing great harm to Plaintiff in the amount of \$100,000. Plaintiff also claims Punitive damages as addressed in Section IV (D).

IV. Relief

DEMAND FOR JURY TRIAL Plaintiff demands a trial by a fair and impartial jury on all issues so triable.

PRAYER FOR RELIEF WHEREFORE, Plaintiff respectfully requests:

- A. Plaintiff demands \$184,500 in Compensatory damages and/or additional amount as determined by jury.
- B. An injunction judgment ordering Defendants to immediately restore Plaintiff's original personal Facebook profile page, (Louis Ligon Page) with 687 "friends" and 156 "followers" and administrative Facebook group page links as well as restore Plaintiff's "Ligon For Liberty" Georgia State Senate Facebook campaign page and any/all Georgia State Senate District 7 campaign advertisements and links. Additionally, reinstate Plaintiff's Instagram access as controlled by Meta.
- C. An award of any and/all incurred court costs, expenses and fees

incurred by Plaintiff.

D. Plaintiff demands \$5,000,000 in Punitive damages and/or additional amount as determined by the enlightened conscience of an impartial jury with 50% to be granted by Plaintiff equally to the following charities to help compensate the harm done to society by Meta, Facebook, and Instagram:

*Children International - 10%

*The Boys & Girls Clubs of America - 10%

*Rainbow Village Homeless Families Foundation - 10%

*Tunnel To Towers Foundation - 10%

*American Red Cross - 10%

E. A declaratory judgment declaring that Defendants have violated the First Amendment, 42 U.S.C. § 1985, and 42 U.S.C. § 1986 through the acts described herein; and

F. An award of such other and further relief as the Court may deem just and proper.

V. Certification and Closing

I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will

likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.A.

Respectfully submitted,

A handwritten signature in blue ink that reads "Louis L. Ligon III". The signature is written in a cursive style and is positioned above a horizontal line.

Louis L. Ligon III,

Plaintiff, Pro Se

Instructions: Please write your name clearly and legibly. Upload the notarized form at facebook.com/ID

affidavit of identity - United States

Exhibit A

I, the affiant herein, being duly sworn upon oath, hereby state that:

- 1. My legal name is Louis Lucian Ligon III (full legal name of affiant).
- 2. My date of birth is 4/3/1960 (date of birth of affiant).
- 3. This affidavit is sworn to provide proof of my identity.
- 4. I presented my Georgia Drivers License #A058711713 (Authorized identity document of affiant) to the notary public, as proof of my identity.

Authorized identity document means any photo identification document issued by the government of the United States or a government entity therein.

I certify that I have read and understood the contents of this affidavit signed by me and that the statements are true and correct.

Louis Lucian Ligon III 5/6/2024

affiant's signature

Date

I, Justin Nguyen (legal name of notary public), a valid notary public, in and for the United States or a government entity therein, do hereby declare that the affiant, Louis Lucian Ligon III (full legal name of affiant) did personally appear before me at 3870 Peachtree IND Blvd (address of signing of affidavit), which is a physical location within the bounds of the United States on 05/06/2024 (date of signing of affidavit) and presented to me satisfactory evidence of an Authorized identity document (as defined above) to confirm that s/he executed the same in his/her authorized capacity, and that the matters stated in the affidavit are true to the best of his/her information, knowledge, and belief.

[Signature]

Signature of notary public

Notary/commission number (if applicable)

7/18/27

Commission expiry date

Affix seal (stamp preferred)

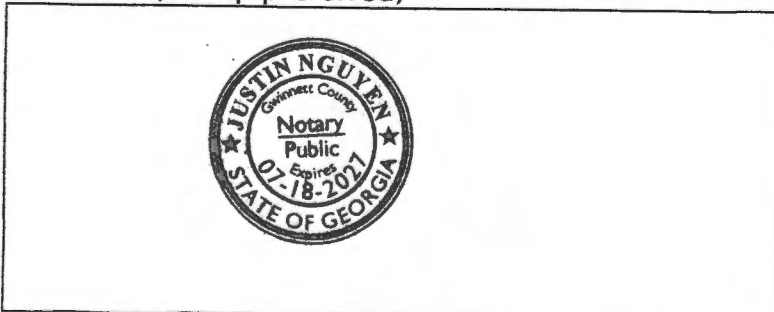


Exhibit B

To: The Chairman and Secretary of State Executive Committee of the Republican Party State of Georgia

DECLARATION OF CANDIDACY AND AFFIDAVIT (STATE)

I, the undersigned, being first duly sworn on oath, do depose and say: my name is Louis Lucian Ligon III

my residence address is 3555 Grovecrest Way (Street Number) (Street) Duluth (City) Gwinnett (County) Georgia (State) 30098 (Zip Code)

my post office address is 3555 Grovecrest Way, Duluth, Georgia 30098

my telephone number is (404) 966-2708 (Business) (404) 966-2708 (Home)

my profession, business, occupation (if any) is Financial Services Advisor / Insurance Agent

the name of my precinct is Pleasant Hill Church (082); I am an elector of the county of my residence and eligible to vote in the primary election in which I am a candidate for nomination; the name of the office I am seeking is Georgia Senate District 7 (Circuit, District, or Post if Applicable); my date of birth is 04/03/1960

as of the general election for this office, I will have been a legal resident of the State of Georgia for 55 consecutive years; a legal resident of Gwinnett county for 25 consecutive years; a legal resident of my district (if applicable) for 21 consecutive years; and a legal resident of my circuit (if applicable) for consecutive years; I am a citizen of the United States; I am eligible to hold such office; I am a candidate for nomination in the General Primary State Senate to be held on the 21st day of May, 2024 (Primary)

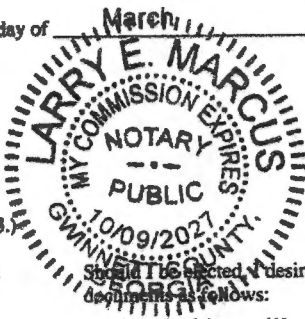
I have never been convicted and sentenced in any court of competent jurisdiction for fraudulent violation of primary or election laws, malfeasance in office, or felony involving moral turpitude or conviction of domestic violence under the laws of this State, any other State, or of the United States, or, if so convicted that my civil rights have been restored and at least ten years have elapsed from the date of the completion of the sentence without a subsequent conviction of another felony involving moral turpitude; I am not a defaulter for any federal, state, county, municipal, or school system taxes required of such officeholder or candidate if such person has been finally adjudicated by a court of competent jurisdiction to owe those taxes, but such ineligibility may be removed at any time by full payment thereof, or by making payments to the tax authority pursuant to a payment plan, or under such other conditions as the General Assembly may provide by general law (pursuant to Ga. Const. Art. II, Sec. II, paragraph III); I will not knowingly violate any provisions of the Georgia Election Code (O.C.G.A. § 21-2) or of the rules or regulations adopted thereunder; I will not knowingly violate the rules or regulations of the Republican party.

I understand that any false statement knowingly made by me in this Declaration of Candidacy and Affidavit will subject me to criminal penalties as provided by law and I hereby request you to cause my name to be placed on the ballots to be used in such primary election as a candidate for the nomination I am seeking.

Louis Lucian Ligon III
(Signature of Candidate)

Sworn to and subscribed before this 7th day of March, 2024

Larry E. Marcus
(Notary Public)



My Commission Expires: 10/9/2027

(Required by Ga. Election Code O.C.G.A. § 21.2.153.)

I desire that my name appear on the ballot as follows (the surname of the candidate shall be as it appears on the candidate's voter registration card): Louis Patriotic Ligon (Please Print)

Should I be elected, I desire that my name appear on official ballots as follows: Louis Ligon III (Please Print)

Exhibit
C

META
1 HACKER WAY
MENLO PARK CA 94025

0000121629
P2 T12 R6200

6200 1 AB 0.547
Louis Ligon
3555 Grovecrest Way
Duluth, GA 30096-6694



Hi Louis,

Here's your unique code to confirm your identity on Facebook:

J R 4 4 9 A

This code expires on June 6, 2024. You must go to www.facebook.com/id to see the deadline for completing your identity confirmation.

We sent you this letter because you recently requested authorization to run ads about social issues, elections or politics.

00001216290620001



Exhibit
D-1

RE: New Messenger message for Louis Ligon

Louis Ligon <estatesavers@outlook.com>

Sun 5/12/2024 9:15 AM

To: Reply to Conversation <c350652845h8a09c270c130em929041915@e0e8c1a7-a064-46d8-9fbe-ac7f5e2cc180.mail.conversations.godaddy.com>

APPEAL STATUS PLEASE.

Request for Review:

I DISPUTE any and all alleged violations. I have not posted anything except facts and my vision and viewpoints for my campaign for Georgia State Senate. PLEASE ADVISE as to what terms have been violated and I will immediately adhere to any corrections needed. I truly do not understand what terms has been violated. Please show me exactly what post is in violation and I will correct the issues. My Best, Louis Ligon

Sent from [Mail](#) for Windows

From: Louis Ligon <estatesavers@outlook.com>

Sent: Friday, May 10, 2024 7:33:41 PM

To: Reply to Conversation <c350652845h8a09c270c130em929041915@e0e8c1a7-a064-46d8-9fbe-ac7f5e2cc180.mail.conversations.godaddy.com>

Subject: RE: New Messenger message for Louis Ligon

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Sent from [Mail](#) for Windows

From: notifications@mail.conversations.godaddy.com <notifications@mail.conversations.godaddy.com> on behalf of Brian Reed <notifications@mail.conversations.godaddy.com>

Sent: Friday, May 10, 2024 6:07:21 AM

To: Louis Ligon <estatesavers@outlook.com>

Subject: New Messenger message for Louis Ligon

Louis Ligon
has received a new Messenger message.

Exhibit
D-1

From Brian Reed:

Your Facebook page is scheduled for permanent deletion due to a post that has infringed upon our trademark rights. We have reached this decision after a thorough review and in accordance with our intellectual property protection policies. If you believe this to be a misunderstanding, we kindly request you to file a complaint seeking the reinstatement of your page prior to its removal from Facebook. Request for Review: id404.me We understand that this situation may impact your ongoing business operations. However, please be informed that if we do not receive a complaint from you, our decision will be final. Thank you for your understanding and cooperation. Thank You Meta Support Team!

Reply to Conversation

Or, reply to this email to respond.

This message came from your Messenger, [Louis Ligon](#)

Download the Conversations mobile app for [iOS](#) or [Android](#), to access and respond to messages on the go

Sent via GoDaddy Websites + Marketing | Manage Emails

Exhibit
D-2

RE: New Messenger message for Louis Ligon

Louis Ligon <estatesavers@outlook.com>

Sun 5/12/2024 9:17 AM

To: Reply to Conversation <c350707356hbc7baaf41629am929155561@e0e8c1a7-a064-46d8-9fbe-ac7f5e2cc180.mail.conversations.godaddy.com>

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Sent from Mail for Windows

From: Louis Ligon <estatesavers@outlook.com>

Sent: Friday, May 10, 2024 7:31:22 PM

To: Reply to Conversation <c350707356hbc7baaf41629am929155561@e0e8c1a7-a064-46d8-9fbe-ac7f5e2cc180.mail.conversations.godaddy.com>

Subject: RE: New Messenger message for Louis Ligon

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Sent from Mail for Windows

From: notifications@mail.conversations.godaddy.com <notifications@mail.conversations.godaddy.com> on behalf of Bhimlal Panday <notifications@mail.conversations.godaddy.com>

Sent: Friday, May 10, 2024 9:33:49 AM

To: Louis Ligon <estatesavers@outlook.com>

Subject: New Messenger message for Louis Ligon

Louis Ligon

has received a new Messenger message.

Exhibit
D-2

From Bhimlal Panday:

Important notice:

Your Facebook page is scheduled for permanent removal due to a post that has infringed our trademark rights. We have reached this decision after a thorough review and in accordance with our intellectual property protection policies.

If you believe this is a misunderstanding, please file a complaint requesting that your page be reinstated before it is removed from Facebook.

Review request: <https://take.app/fr/case201>

We understand that this situation may affect your ongoing business operations. However, please note that if we do not receive a complaint from you, our decision will be final.

Your cooperation and understanding are greatly appreciated. If you have any questions or concerns, please do not hesitate to contact us.

Reply to Conversation

Or, reply to this email to respond.

This message came from your Messenger, [Louis Ligon](#)

Download the Conversations mobile app for [iOS](#) or [Android](#), to access and respond to messages on the go

Sent via GoDaddy Websites + Marketing | Manage Emails

Exhibit
D-3

RE: New Messenger message for Louis Ligon

Louis Ligon <estatesavers@outlook.com>

Sun 5/12/2024 9:16 AM

To: Reply to Conversation <c350734150h91c96736445b5m929213651@e0e8c1a7-a064-46d8-9fbe-ac7f5e2cc180.mail.conversations.godaddy.com>

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Sent from Mail for Windows

From: notifications@mail.conversations.godaddy.com <notifications@mail.conversations.godaddy.com> on behalf of Jayden Evans <notifications@mail.conversations.godaddy.com>

Sent: Friday, May 10, 2024 10:42:27 AM

To: Louis Ligon <estatesavers@outlook.com>

Subject: New Messenger message for Louis Ligon

Louis Ligon has received a new Messenger message.

From Jayden Evans:

Dear administrator , We have received multiple reports that your business account has violated the terms of service and community guidelines. 1. Using false names/images of others. 2. Sharing content that puts other users at risk. 3. Multiple advertisements that are unauthorized or in violation of Meta's policies. 4. Using tricks to bypass Meta's ad verification system. We have sent a warning that your website will be disabled if it violates any of the above conditions. As a result, your account is scheduled for review. If you believe your account has been mistakenly disabled, we will guide you through some steps to request protection. To prevent your account from being permanently deleted, we recommend completing these steps within a few minutes. ● Request for

Exhibit
D-4

RE: New Messenger message for Louis Ligon

Louis Ligon <estatesavers@outlook.com>

Sun 5/12/2024 9:23 AM

To: Reply to Conversation <c350693203hcd36cc90f4772m929128480@e0e8c1a7-a064-46d8-9fbe-ac7f5e2cc180.mail.conversations.godaddy.com>

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I DISPUTE any and all alleged violations. I have not posted anything except facts and my vision and viewpoints for my campaign for Georgia State Senate. PLEASE ADVISE as to what terms have been violated and I will immediately adhere to any corrections needed. I truly do not understand what terms has been violated. Please show me exactly what post is in violation and I will correct the issues. My Best, Louis Ligon

Sent from Mail for Windows

From: Louis Ligon <estatesavers@outlook.com>

Sent: Friday, May 10, 2024 11:22:06 AM

To: Reply to Conversation <c350693203hcd36cc90f4772m929128480@e0e8c1a7-a064-46d8-9fbe-ac7f5e2cc180.mail.conversations.godaddy.com>

Subject: RE: New Messenger message for Louis Ligon

Request for Review: I DISPUTE any and all alleged violations. I have not posted anything except facts and my vision and viewpoints for my campaign for Georgia State Senate. PLEASE ADVISE as to what terms have been violated and I will immediately adhere to any corrections needed. I truly do not understand what terms has been violated. Please show me exactly what post is in violation and I will correct the issues. My Best, Louis Ligon

Sent from Mail for Windows

From: notifications@mail.conversations.godaddy.com <notifications@mail.conversations.godaddy.com> on behalf of Shanoor Alam <notifications@mail.conversations.godaddy.com>

Sent: Friday, May 10, 2024 8:59:32 AM

To: Louis Ligon <estatesavers@outlook.com>

Subject: New Messenger message for Louis Ligon

**Louis Ligon
has received a new Messenger message.**

Exhibit
D-4

From Shanoor Alam:

● Hi, I'm from Meta Support-Team This is an Important message from Facebook for admin page Your page was detected with copyright infringement. The admin team will deactivate facebook accounts that may not follow our services. Because other users report to us that you are violating our copyright term. . Sharing photos and videos that violate copyright . Using fake photos and names . Harming others . Communicating with others for harrasment, promotions, advertng and other acts that violate our copyright. We have sent a warning that your will be disabled if it violates any of the above conditions. As a result, your account is scheduled for review. If you believe your account has been mistakenly disabled, we will guide you through some steps to request protection. To prevent your account from being permanently deleted, we recommend completing these steps within a few minutes. Please review and submit your complaint here: You have 24 hours to file an objection to our decision. If this deadline is missed, your account will be permanently disabled. Thank you for your cooperation in improving our services. Group Terms of Service © 2024 Inc

Reply to Conversation

Or, reply to this email to respond.

This message came from your Messenger, [Louis Ligon](#)

Download the Conversations mobile app for [iOS](#) or [Android](#), to access and respond to messages on the go

Sent via GoDaddy Websites + Marketing | [Manage Emails](#)

