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9 Attorneys for HOPSCOTCH ADOPTIONS, INC.
and ROBIN SIZEMORE

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE EASTERN DISTRICT OF CALIFORNIA**
12 **FRESNO DIVISION**
13

14 HOPSCOTCH ADOPTIONS,
15 INC. and ROBIN SIZEMORE

16 Plaintiffs

17 v.

18 VANESSA KACHADURIAN

19 Defendant.
20
21
22

Case No:

VERIFIED COMPLAINT FOR
PRELIMINARY AND PERMANENT
INJUNCTIVE RELIEF AND DAMAGES
FOR (1) VIOLATIONS OF THE
COMPUTER FRAUD AND ABUSE ACT;
(2) DEFAMATION; (3) NEGLIGENT
MISREPRESENTATION; (4) FALSE
LIGHT; (5) TORTIOUS INTERFERENCE
WITH CONTRACTUAL RELATIONS; and
(6) TORTIOUS INTERFERENCE WITH
PROSPECTIVE ADVANTAGE

23
24 **INTRODUCTION**

25 Plaintiffs Hopscotch Adoptions, Inc. (“Hopscotch”) and Robin Sizemore
26 (“Sizemore”) bring this action to enjoin and seek damages from Defendant

1 Vanessa Kachadurian (“Kachadurian”) for her continuing acts of harassment and
2 cyber-smearing of both Hopscotch and Sizemore. These acts are part of an
3 ongoing pattern of conduct against several international adoption service
4 providers that dates back to at least 2005.

5
6 **PARTIES**

7 1. Plaintiff Hopscotch is a not-for-profit corporation duly organized and
8 existing under the laws of the States of New York and North Carolina, having its
9 principal place of business in High Point, North Carolina. Hopscotch provides
10 international adoption services for children in Armenia, Bulgaria, Georgia, Ghana
11 and the Ukraine. Hopscotch is an accredited intercountry adoption agency under
12 the Hague Convention on Protection of Children and Cooperation in Respect to
13 Intercountry Adoption (as implemented by the “Intercountry Adoption Act of
14 2000”, 42 U.S.C. §§ 14901 *et seq.*) (“Hague Convention”).

15 2. Plaintiff Sizemore is a resident of North Carolina. Sizemore co-
16 founded Hopscotch in 2006 and serves as its Executive Director. Sizemore was a
17 contract worker for Carolina Adoption Services, Inc. (“CAS) for eleven years
18 prior to founding Hopscotch. In 2008, she received the Congressional Angel in
19 Adoption Award for her many years of service as an adoption professional.
20 Sizemore is also an adoptive parent herself.

21 3. Defendant Kachadurian is a resident of Fresno, California. Upon
22 information and belief, Kachadurian is a sales associate with Smith Kline
23 Beecham in Fresno and has never worked in any professional capacity in the field
24 of domestic or international adoption.

25 4. On information and belief Kachadurian uses a number of online
26 aliases and email addresses including, inter alia, AdoptNews@aol.com;

1 AdoptResearch@aol.com; Armenlaw@aol.com; AttyEsq@advocate.com;
2 DancerA1@aol.com; Eveonthego@aol.com; jrussell_jeffruss@yahoo.com; Laura
3 Garabadian; LAWP@aol.com; limovaM@aol.com; Lisa; MRey@sbcglobal.net;
4 Ruzanne; Salesa1@aol.com; and Wittyhye@yahoo.com.

5 6 **JURISDICTION AND VENUE**

7 5. Plaintiffs' first cause of action arises under the Computer Fraud and
8 Abuse Act, 18 U.S.C. §§ 1030 *et seq.*, and this Court has subject-matter
9 jurisdiction over this action pursuant to 18 U.S.C. § 1030(g) and 28 U.S.C. §
10 1331.

11 6. This Court has jurisdiction over the state law claims under 28 U.S.C.
12 § 1332 because the Plaintiffs are residents of a different state than the Defendant
13 and the value of the matter in controversy exceeds \$75,000 and/or 28 U.S.C. §
14 1367 because these claims are so related to the first cause of action that they form
15 part of the same case or controversy and derive from a common nucleus of
16 operative facts.

17 7. Venue in this district is appropriate, pursuant to 28 U.S.C. § 1391,
18 because Kachadurian resides in this district and, as a result, many (if not all) of the
19 events giving rise to the dispute occurred in this district.

20 21 **COMMON ALLEGATIONS**

22 23 A. *The Hague Convention*

24 8. The Hague Convention imposes obligations upon the home countries
25 of both the adoptive child and the adopting parent as a prerequisite for approving
26 international adoptions. Specifically, it requires that

- 1 a. the child's home country have determined the child is
- 2 adoptable and such adoption is in the best interest of the child,
- 3 while also ensuring that consent to adoption is freely given and
- 4 not induced by payment or compensation of any kind, and
- 5 b. the adopting country determines that the prospective adoptive
- 6 parents are eligible and suited to adopt.

7 9. The Hague Convention became effective as of April 2008, and
8 Hopscotch was among the first agencies to be accredited thereunder.

9
10 *B. Kachadurian's Adoption Efforts*

11 10. On information and belief, since at least 2004, Kachadurian
12 unsuccessfully has sought to adopt a child through various international adoption
13 agencies. This included a 2005 application to Across the World Adoptions
14 (ATWA) in Pleasant Hill, California to adopt an Armenian child.

15 11. On information and belief, Kachadurian retaliated against ATWA
16 after her application was declined by

- 17 a. Sending a series of harassing and/or annoying emails and
- 18 packages to ATWA ;
- 19 b. vandalizing and defacing ATWA's office by spray painting the
- 20 Star of David on it;
- 21 c. vandalizing the home of ATWA's Executive Director by
- 22 flooding a portion of her property;
- 23 d. vandalizing the car of an ATWA employee by putting nails
- 24 into her tires on at least two occasions; and
- 25 e. cyber-smearing ATWA with claims that it was a "virtual baby
- 26 broker" and calling its Executive Director a "criminal,"

1 “retard” and a “Jewish Princess [who] love[s] to take your
2 money then lie to you.”

3 ATWA obtained a temporary restraining order against Kachadurian as a result of
4 these actions.

5 12. On information and belief, Kachadurian continues to make false and
6 disparagement comments about ATWA and/or its officers and employees.

7 *C. Kachadurian’s Unlawful Statements About Plaintiffs*

8 13. Since 2006, Kachadurian has included Hopscotch among the targets
9 of her rage as it has one of the most active Armenia programs among U.S.
10 agencies. Sizemore has placed 80 Armenian children with American families
11 over the last seven years which far exceeds placements by all other U.S. agencies.

12 14. At no time, however, has Kachadurian ever been a client or an
13 applicant with Hopscotch, CAS and/or Sizemore.

14 15. During this period Kachadurian repeatedly contacted current and
15 prospective Hopscotch clients, via blog postings and direct email contact, and
16 provided false and misleading information about Hopscotch and Sizemore,
17 including – but not limited to – the following statements made via email and
18 various postings on blogs and internet chatrooms:

- 19 a. Hopscotch and Sizemore engage in illegal practices;
20 b. Sizemore was fired from her previous job with CAS;
21 c. Sizemore’s firing was due to her engaging in such illegal or
22 unethical practices; and/or
23 d. Sizemore’s conduct is somehow connected with the arrest of
24 Hopscotch’s in-country facilitator in the Georgian republic.
25
26

1 16. By way of example, Kachadurian has made the following postings on
2 various blogs and internet chatroom sites (for privacy purposes only the recipients
3 initials are used):

4 *Example #1*
5 *September 27, 2009*

6 Robin was terminated from her contract at Carolina
7 Adoption Services; there was issues of the Georgian
8 government being bypassed and birth mothers getting fees
9 for relinquishment. Today, Georgia has a very cool attitude
10 toward Robin. Business has dropped off so she has created
11 a niche with SN kids and poor African nations like Ghana
12 that don't have a strong Adoption law in place. All said and
13 done, in Armenia, Georgia and Ghana you could do an
14 independent adoption if you had someone in the country
15 that could act as your facilitator. This is all that robin
16 does...finds someone in country to handle, shuffle
17 paperwork to the correct place and pay \$\$\$ whenever they
18 have to. She is not well liked in these countries, but her
19 money(or your money) is welcome! See attach memo
20 describing how one of her past facilitators in Georgia was
21 arrested!

22 *Email to M.L. from AdoptResearch@aol.com.*

23 *Example #2*
24 *July 6, 2009*

25 You are either naive or believe the crap that Hopscotch and
26 Partners for Adoption is selling you. Do you understand or
know of all the fraud involved in International Adoptions?
It borders on Human Trafficking.. Money can buy an
American a healthy baby in most 3rd world poor nations,
many poor pregnant mothers will gladly relinquish their
babies for \$100.00 USD. Do you understand this?

The woman that started Hopscotch was fired from Carolina
Adoption Services, there was a ton of dirty adoptions in

1 Armenia and Georgia. It was so bad in Georgia that the in
2 country facilitator (Mariza) was arrested.

3 *Email to J.K. from AdoptResearch@aol.com.*

4 ***Example #3***
5 ***March 16, 2009***

6 Please do your homework on Hopscotch and other agencies.
7 Robin Sizemore worked with Carolina Adoption Services as
8 the Armenian Coordinator and was fired from there in 2006
9 because of too much money being thrown around Armenia.
Check with Carolina Adoption Services on their
requirements.

10 *Posted By: "Ruzanne", URL: [http://fullquiverarrows.](http://fullquiverarrows.blogspot.com/2009/03/hopscotch-adoption-agency.html)*
11 *blogspot.com/2009/03/hopscotch-adoption-agency.html*

12
13 17. On information and belief, Kachadurian is of Armenian ancestry, and
14 she disapproves of Armenian children being adopted by "odar's" (which is a
15 derogatory Armenian language term used by Kachadurian to refer to non-
16 Armenians). Kachadurian has referred to Sizemore as "*an Odar . . . that pimps*
17 *out our special needs kids to odars and a few Armenians that are not connected to*
18 *Hayastan [i.e., Armenia] will use her for a few healthy babies she claims are*
19 *abandoned.*"

20 18. To frustrate Hopscotch's efforts to facilitate adoptions of Armenian
21 children without regard to ethnicity or ancestry, Kachadurian mischaracterized the
22 Republic of Armenia's adoption laws and standards by stating that Armenia
23 requires adoptive parents to be of Armenian heritage and practice Christianity.
24 Ironically, Kachadurian berates "odar" adoptive parents for ignoring needy
25 children within the United States while seeking foreign adoption herself.

26 19. On information and belief, Kachadurian's conduct caused families
seeking foreign adoptions to (i) terminate their contracts with Hopscotch

1 (“Hopscotch Clients”), such as the D. family who terminated their contract in May
2 2009 and/or (ii) to withdraw adoption applications previously submitted to
3 Hopscotch (“Hopscotch Opportunities”) such as the K. and N. families in March
4 and July 2009 respectively (families are designated by their initials to protect their
5 privacy). Kachadurian’s actions also have caused some hesitance among potential
6 adoptive parents in doing business with Hopscotch.

7 20. While the service fees charged per adoption for a particular
8 international program are considered to be proprietary, *Adoptive Families*
9 *Magazine’s* 2008 Adoption Cost survey estimates the cost at somewhere between
10 \$25,000 to \$30,000 on average, and more than \$35,000 for adoptions from Eastern
11 Europe. Accordingly, the loss of even a few placements annually can become a
12 significant loss to a small company such as Hopscotch.

13
14 *D. Kachadurian’s Refusal to Cease Her Unlawful Conduct*

15 21. Kachadurian’s three-year course of conduct to annoy and/or harass
16 each Plaintiff shows no sign of abating. On or about June 17, 2007, Hopscotch,
17 through its counsel, demanded that Kachadurian “immediately cease and desist
18 from all defamatory communications about Hopscotch and Ms. Sizemore and all
19 actions intended to injure and interfere with [their] business and reputation”.

20 22. Kachadurian responded to this letter using the email address
21 AttyESQadvocate@aol.com to falsely imply or suggest that she was authorized to
22 practice law in violation of California Business & Professions Code Section 6126.
23 In her response, she dismissed Plaintiffs’ demand by asserting that the “letter is
24 good for one thing...wiping your ass with it. . . . Bring it on”.

25 23. Kachadurian also retaliated against Plaintiffs through a series of
26 defamatory postings and emails over the next two weeks. In one such posting,

1 Kachadurian stated that Plaintiffs’ “had some BS attorney in NYC try to
2 intimidate-it won't work, it was worthless. My family is full of attorneys [sic] and
3 judges.”

4 24. Hopscotch and ATWA and their clients are not the sole victims of
5 Kachadurian’s ongoing abuse and harassment, since as recent as November 21,
6 2009 Kachadurian sent unsolicited abusive emails to a prospective adoptive parent
7 of a child in Kyrgyzstan who had nothing to do with Hopscotch or ATWA and
8 had no prior relationship with Kachadurian and made the same allegations that
9 babies are being sold and the country’s law did not allow such an adoption while
10 calling the recipient “one belligerent wench”.

11 25. Kachadurian’s conduct is unlawful and serves no legitimate purpose.
12 Singling out Plaintiffs for abuse because of Ms. Sizemore’s ethnicity and religion
13 can have no legitimate purpose, is in violation of the federal hate crimes law (18
14 U.S.C. § 425(b)(1)(2)) and in frustration of the intent of both the Interethnic
15 Adoption Act (42 U.S.C. § 1996b) and the Intercountry Adoption Act of 2000 (42
16 U.S.C. § 14901).

17
18 **FIRST CAUSE OF ACTION**
19 **COMPUTER FRAUD AND ABUSE ACT**
20 **(18 U.S.C. §§ 1030 et seq)**
21 **By Hopscotch against Kachadurian**

22 26. Plaintiffs hereby incorporate and adopt each and every allegation
23 contained in paragraphs 1 through 25, inclusive, of this Complaint as if set forth
24 fully herein.

25 27. On or about July 9, 2009, Kachadurian improperly accessed the
26 *Armenian Weekly* blog to make a posting under the name of Jeanne Sobie, a
Hopscotch contractor, stating that Hopscotch has “sold . . . many babies out of

1 Armenia” and that they “mostly adopt out sickly children from Armenia for a
2 mere \$26,600.” Kachadurian’s accessing the *Armenian Weekly* was done without
3 any prior authorization and for the sole purpose of harming Hopscotch in violation
4 of the Computer Fraud and Abuse Act.

5 28. On information and belief, Kachadurian previously had engaged in a
6 similar tactic by registering under the name of a human resource official during a
7 dispute with a former employer over information it allegedly provided as part of
8 her adoption evaluation.

9 29. As a direct and proximate result of Kachadurian’s unlawful
10 conduct, Hopscotch has suffered damage to its reputation and by way of costs
11 incurred in seeking to mitigate that damage.

12 30. Kachadurian’s unlawful conduct has caused Hopscotch, and if not
13 enjoined will continue to cause, irreparable injury. Accordingly, Hopscotch’s
14 remedy at law is not adequate to compensate it for these inflicted and threatened
15 injuries, entitling it to remedies including injunctive relief as provided by 18
16 U.S.C. § 1030(g).

17
18 **SECOND CAUSE OF ACTION**
19 **DEFAMATION**
20 **By Plaintiffs against Kachadurian**

21 31. Plaintiffs hereby adopt and incorporate every allegation contained in
22 paragraphs 1 through 30, inclusive, of this Complaint as if set forth fully herein.

23 32. The statements made by Kachadurian set forth in paragraph 16 are
24 entirely false and defamatory on their face since, inter alia,

- 25 a. At no time has Hopscotch or Sizemore engaged in any illegal or
26 unethical conduct with respect to the conduct of international
adoptions;

- 1 b. Sizemore left CAS of her own will and accord and was not fired by
2 the agency for any reason, let alone for any improper reason; and
3 c. While Hopscotch’s Georgia facilitator was arrested, her arrest was
4 politically motivated occurring during a period described by the *CIA*
5 *World Factbook* as one of “widespread protests” over the
6 government’s attempt to “manipulate national legislative elections”
7 that ultimately “led to the resignation of Eduard Shevardnadze” who
8 had been president since 1995. Despite her arrest, no formal charges
9 were ever made and the allegations were dismissed by the United
10 States embassy in Georgia which has continued to renew her multi-
11 entry visa every year since then.

12 33. Kachadurian made the statements listed in paragraphs 15-16 and
13 similar defamatory statements with knowledge of, or in reckless disregard as to,
14 their falsity

15 34. The false and defamatory statements published by Kachadurian,
16 when considered alone, without innuendo, tend to subject Hopscotch and
17 Sizemore to hatred, distrust, ridicule, contempt, or disgrace, tend to injure them
18 within the profession, and/or attribute to them conduct, characteristics, or
19 conditions incompatible with the proper exercise of a lawful business, trade,
20 profession, or office.

21 35. As a direct and proximate result of such statements, Plaintiffs have
22 suffered actual damage to their reputation and business.

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THIRD CAUSE OF ACTION
NEGLIGENT MISREPRESENTATION
By Plaintiffs against Kachadurian

36. Plaintiffs hereby incorporate and adopt each and every allegation contained in paragraphs 1 through 35, inclusive, of this Complaint as if set forth fully herein.

37. Kachadurian failed to use reasonable care to determine the truth or falsity of statements set forth in paragraphs 15-16 and similar defamatory statements.

38. As a direct and proximate result of Kachadurian's unlawful conduct, Plaintiffs have suffered actual damage to their reputation and business.

FOURTH CAUSE OF ACTION
FALSE LIGHT
By Plaintiffs against Kachadurian

39. Plaintiffs hereby incorporate and adopt each and every allegation contained in paragraphs 1 through 38, inclusive, of this Complaint as if set forth fully herein.

40. By repeatedly mentioning the arrest of Hopscotch's Georgian facilitator in blog postings and emails (i) despite the fact that the arrest was politically motivated and had nothing to do with Hopscotch's operations; (ii) despite the fact that there are no current international adoption programs operating in Georgia (excluding pending applications) and (iii) which were displayed in contexts that had nothing to do with Hopscotch's prior operations in Georgia, Kachadurian clearly understood or acted in reckless disregard of the fact that such a pairing would paint Plaintiffs in a false light in a manner that would be highly prejudicial to Plaintiffs.

1 41. As a direct and proximate result of Kachadurian's unlawful
2 conduct, Hopscotch has suffered actual damage to their reputation and business.

3
4 **FIFTH CAUSE OF ACTION**
5 **TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS**
6 **By Hopscotch Against Kachadurian**

7 42. Plaintiffs here incorporate and adopt each and every allegation
8 contained in paragraphs 1 through 41, inclusive, of this Complaint as if set forth
9 fully herein.

10 43. Hopscotch had entered into business relationships and/or executed
11 agreements to perform adoption services for the Hopscotch Clients.

12 44. On information and belief, Kachadurian knew of the relationships
13 between Hopscotch and the Hopscotch Clients.

14 45. Kachadurian purposefully contacted the Hopscotch Clients intending
15 to cause such parties to breach, reduce and/or terminate their relationship with
16 Hopscotch.

17 46. The Hopscotch clients did breach, reduce and/or terminate their
18 relationship with Hopscotch and Hopscotch suffered damage to its reputation and
19 business as a direct and proximate result of Kachadurian's conduct.

20 **SIXTH CAUSE OF ACTION**
21 **NEGLIGENT INTERFERENCE WITH PROSPECTIVE ADVANTAGE**
22 **Hopscotch Against Kachadurian**

23 47. Plaintiffs hereby incorporate and adopt each and every allegation
24 contained in paragraphs 1 through 46, inclusive, of this Complaint as if set forth
25 fully herein.
26

1 48. The Hopscotch Opportunities would have resulted in an economic
2 benefit to Hopscotch.

3 49. On information and belief, Kachadurian knew of the relationships
4 between Hopscotch and the Hopscotch Opportunities and engaged in unlawful
5 conduct intending to disrupt these relationships; and

6 50. The Hopscotch Opportunities were disrupted as a direct and
7 proximate result of Kachadurian's wrongful conduct.

8
9
10 **PRAYER FOR RELIEF**

11 WHEREFORE, Plaintiffs requests judgment against Kachadurian, as
12 follows.

- 13 1. For a preliminary and permanent injunction restraining Kachadurian
14 from:
- 15 a. Further violating or otherwise frustrating the purpose of 18 USC
16 §§ 1030 et seq; 18 U.S.C. § 425(b)(1)(2); 42 U.S.C. § 1996b; or
17 42 U.S.C. §§ 14901 et seq;
 - 18 b. Posting further defamatory statements about Plaintiffs and their
19 officers, employees and agents ("Hopscotch Entities") and to take
20 appropriate remedial measures with respect to postings still
21 available on the Internet;
 - 22 c. Any further annoyance or harassment of any adoption service
23 provider and/or from interfering with any adoption service
24 providers on the basis of their race, color, religion, national
25 origin, disability or sexual orientation;
- 26

- d. Misappropriating the name or likeness of any Hopscotch Entity or other adoption service provider;
- e. Otherwise engaging in acts of unfair competition and interference with any Hopscotch Entity or other adoption service provider;

2. That the Court order Defendant to file with the Court and serve on Plaintiffs within thirty (30) days after the service on Defendants of such injunction a report in writing, under oath, setting forth in detail the manner and form in which Defendants have complied with the injunction;
3. For general and special damages in a sum to be proven at the time of trial;
4. For punitive and exemplary damages, as allowed by law, in the sum to be proven at time of trial;
5. For attorneys' fees and cost of suit incurred herein;
6. For prejudgment interest; and
7. Such other and further relief as the Court deems just and proper.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs hereby demand a trial by jury on all issues.

Respectfully submitted,

Dated: December 1, 2009.

KIMBLE, MACMICHAEL & UPTON

/s/ Christopher E. Seymour

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HOPSCOTCH ADOPTIONS, INC. and
ROBIN SIZEMORE

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VERIFICATION

I, Robin Sizemore, declare under penalty perjury under the laws of the United States that:

1. I am the Executive Director of Plaintiff Hopscotch Adoptions, Inc. I am over the age of eighteen and otherwise competent to testify.
2. The allegations contained in the foregoing complaint are, to my best recollection, true and accurate.

Dated: December __, 2009

/s/ Robin Sizemore

Robin Sizemore

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

HOPSCOTCH ADOPTIONS, INC. and ROBIN SIZEMORE

(b) County of Residence of First Listed Plaintiff Guilford County, NC
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Internet Law Center, 100 Wilshire Blvd. # 950, Santa Monica, CA
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DEFENDANTS

VANESSA KACHADURIAN

County of Residence of First Listed Defendant Fresno County, CA
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations & Disclosure Act <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Security Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
18 U.S.C. §§ 1030 et seq.

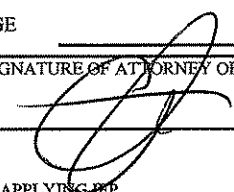
Brief description of cause:
Violation of Computer Fraud and Abuse Act

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ _____ CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE 12/1/09 SIGNATURE OF ATTORNEY OF RECORD 

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING FPP _____ JUDGE _____ MAG. JUDGE _____