

Exhibit “1”

1 **ACOM**
 2 JONATHAN B. GOLDSMITH, ESQ.
 3 Nevada Bar No. 11805
 4 9029 South Pecos Road, #2800
 5 Henderson, Nevada 89074
 6 702.386.8637 (phone)
 7 702.385.3025 (fax)
 8 jgoldsmith@lawrosen.com
 9 In Proper Person

6 UNITED STATES DISTRICT COURT
 7 DISTRICT OF NEVADA

8 JONATHAN B. GOLDSMITH, ESQ., an
 9 Individual

CASE NO. 2:10-cv-01845-rlh-pal

9 Plaintiff,

10 vs.

11 JORDAN R. COOPER, an Individual;
 12 CHERYL COOPER DRISCOLL, an
 13 Individual; FACEBOOK, INC.; a Foreign
 14 Corporation; DOES 1 through 5 and ROE
 15 CORPORATIONS 1 through 5, inclusive,

14 Defendants.

15 **PLAINTIFF'S FIRST AMENDED COMPLAINT**
 16 **FOR DAMAGES AND INJUNCTIVE RELIEF**

17 COMES NOW, Plaintiff, JONATHAN B. GOLDSMITH, ESQ. (hereinafter "Plaintiff"), in
 18 Proper Person, and for his First Amended Complaint for Damages and Injunctive Relief, pursuant to
 19 FRCP 15(a), against Defendant JORDAN R. COOPER (hereinafter "Cooper"), Defendant CHERYL
 20 COOPER DRISCOLL (hereinafter "Cooper Driscoll"), and Defendant FACEBOOK, INC. (hereinafter
 21 "Facebook") alleges the following.

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GENERAL ALLEGATIONS

1. Plaintiff JONATHAN B. GOLDSMITH, ESQ., a member of the State Bar of Nevada, is, and has been for a period of more than six months prior to the filing of this action, a resident of the State of Nevada, County of Clark.
2. Upon information and belief, Defendant JORDAN R. COOPER is, and has been for a period of more than six months prior to the filing of this action, a resident of the State of Nevada, County of Clark.
3. Upon information and belief, Defendant CHERYL COOPER DRISCOLL is a resident of the State of Arizona, and has, by means of the Internet, participated and conducted tortious acts across state lines in the State of Nevada and all states with access to the Internet.
4. Upon information and belief, Defendant FACEBOOK, INC. is a foreign corporation licensed in the State of California and doing business primarily as an Internet social networking website with reach to all states with access to the Internet, including the State of Nevada.
5. Plaintiff is counsel of record in a domestic case in the Eighth Judicial District Court whereby Defendant Cooper is an opposing party.
6. Plaintiff has had no contact with Defendant Cooper or any Defendant except through his counsel of record in the aforementioned case.
7. Nevertheless, Defendants have consistently and continually committed defamation and privacy violations in addition to several other purposeful tortious acts against Plaintiff through the use of the world wide web and by other means.
8. Specifically, on or around October 1, 2010 at around 3:30 p.m., Defendant Cooper, by means of Defendant Facebook's internet social networking website, published defamatory and demeaning statements specifically directed at Plaintiff which stated: "im on to you jonathan golddick(smith) ha faggot" and further stated "he looks like a pediphile (sic)."
9. Further, Defendants published the statement of a Facebook user which stated: "ha I want to se (sic) what that douche bag looks like."

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- 1 10. Moreover, on or around October 2, 2010 at around 6:10 p.m., Defendant Cooper Driscoll, by
2 means of illegal and tortious invasion of privacy, stole a private photograph depicting the likeness
3 of Plaintiff, and, by means of Defendant Facebook's internet social networking website,
4 published the stolen picture on Defendant Cooper's internet page, which is managed and
5 maintained by Defendant Facebook.
- 6 11. Defendants Cooper and Cooper Driscoll made disparaging remarks about the stolen photograph,
7 and Defendant Cooper Driscoll acknowledged that Defendants had committed unlawful and
8 tortious behavior by posting the following statement: "delete that picture already."
- 9 12. Defendant Cooper, by means of Defendant Facebook, published statements about Plaintiff,
10 including that Plaintiff is a "faggot" and a "pedophile" which constitute slander per se.
- 11 13. Defendant Cooper Driscoll, by means of Defendant Facebook, caused to be published a personal
12 and private photograph depicting the name, image and likeness of Plaintiff along with
13 disparaging statements coinciding with the stolen picture.
- 14 14. With regard to all allegations related to torts committed against Plaintiff over the internet,
15 Defendant Facebook facilitated, published or neglected to mitigate the defamatory and harassing
16 statements and comments published by Defendant Cooper and Defendant Cooper Driscoll.
- 17 15. Plaintiff, who is an attorney in the State of Nevada runs an operates a law firm in the State.
- 18 16. Much of Plaintiff's business is dependant on the public's view of Plaintiff's moral character,
19 reliability and reputation.
- 20 17. Defendants' actions have already, and will likely continue to demean and diminish Plaintiff's
21 reputation in the legal community as well as with Plaintiff's personal social community.
- 22 18. Plaintiff uses Defendant Facebook's marketing and advertising programs to advertise and market
23 Plaintiff's business.
- 24 19. As a result of Defendant's actions, Plaintiff has been forced to seize all advertising and
25 marketing through Defendant Facebook given that a diminishment of Plaintiff's reputation is
26 taking place through Defendant Facebook as a result of Defendant Cooper and Defendant Cooper
27 Driscoll's actions.
- 28 20. Plaintiff has suffered extreme emotional distress as a result of Defendant's actions.

1 21. Defendant Cooper has engaged in a pattern of stalking against Plaintiff.

2 22. Most notably, in around August, 2010, Plaintiff observed Defendant's yellow Ford mustang with
3 black stripes, with the license plate "Sage 3", parked outside of Plaintiff's law office located at
4 1212 South Casino Center Boulevard in Las Vegas, Nevada.

5 23. Additionally, after Plaintiff moved offices, Defendant Cooper has driven by and appeared several
6 times at Plaintiff's new office located in Henderson, Nevada while driving a red Ford Mustang.

7 24. Since the filing of the original Complaint, on or around October 15, 2010, at approximately 5:30
8 p.m, Plaintiff witnessed Defendant Cooper drive up and back several times in a new model red
9 Ford Mustang with the custom Nevada License Plate reading: "Sage 3" passing Plaintiff's office
10 located at 9029 South Pecos Road in Henderson, Nevada.

11 25. At that time, Plaintiff entered his vehicle and drove next to Defendant Cooper's red mustang and
12 confirmed that Mr. Cooper was in fact driving the vehicle.

13 26. Defendant Cooper Driscoll has also engaged in a pattern of stalking against Plaintiff.

14 27. Specifically, Defendant Cooper Driscoll created a false profile on Defendant Facebook's website
15 using a false name and false picture, in order to gain access to Plaintiff's personal and private
16 information.

17 28. Upon information and belief, Defendant Cooper Driscoll, by means of creating a false identity
18 as described in Paragraph 27, or by other unlawful and tortious means, has gained access to
19 Plaintiff's private and secure information.

20 **FIRST CAUSE OF ACTION**

21 (Slander against all Defendants)

22 29. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs
23 although fully incorporated herein. Plaintiff further alleges:

24 30. Defendants made a false and defamatory oral communication concerning Plaintiff.

25 31. Defendants' communication was published to a third party.

26 32. Defendants knew or should have known the communication was false and that it defamed
27 Plaintiff.
28

- 1 33. Defendants' publication of the communication was a legal cause of special damages to the
2 plaintiff.
- 3 34. Defendant Facebook facilitated, published or neglected to mitigate the defamatory and harassing
4 statements and comments published by Defendant Cooper and Defendant Cooper Driscoll.
- 5 35. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of
6 \$10,000.00.
- 7
- 8 36. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and,
9 therefore, Plaintiff is entitled to exemplary or punitive damages as a result.
- 10 37. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these
11 claims and is entitled to any and all costs incurred herein, including, without limitation, any and
12 all attorneys' fees.

13 **SECOND CAUSE OF ACTION**

14 (Slander Per Se against all Defendants)

- 15
- 16 38. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs
17 although fully incorporated herein. Plaintiff further alleges:
- 18 39. Defendants made a false and defamatory oral communication concerning Plaintiff.
- 19
- 20 40. Defendants' communication was published to a third party.
- 21 41. Defendants knew or should have known the communication was false and that it defamed
22 Plaintiff.
- 23 42. Defendants communication imputes to Plaintiff the commission of a crime and would tend to
24 injure Plaintiff in his trade, profession, business and office.
- 25 43. Defendant Facebook facilitated, published or neglected to mitigate the defamatory and
26 harassing statements and comments published by Defendant Cooper and Defendant Cooper
27 Driscoll.
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44. As result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

45. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

46. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

THIRD CAUSE OF ACTION

(Libel against all Defendants)

47. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:

48. Defendants made a false and defamatory written communication concerning Plaintiff.

49. Defendants' communication was published to a third party.

50. Defendants knew or should have known the communication was false and that it defamed Plaintiff.

51. Defendants' publication of the communication was a legal cause of special damages to the plaintiff.

52. Defendant Facebook facilitated, published or neglected to mitigate the defamatory and harassing statements and comments published by Defendant Cooper and Defendant Cooper Driscoll.

53. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

54. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

1 55. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these
2 claims and is entitled to any and all costs incurred herein, including, without limitation, any
3 and all attorneys' fees.

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5 **FOURTH CAUSE OF ACTION**

6 (Libel Per Se against all Defendants)

7 56. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs
8 although fully incorporated herein. Plaintiff further alleges:

9 57. Defendants made a false and defamatory written communication concerning Plaintiff.

10 58. Defendants' communication was published to a third party.

11 59. Defendants knew or should have known the communication was false and that it defamed
12 Plaintiff.

13 60. Defendants communication imputes to Plaintiff the commission of a crime and would tend to
14 injure Plaintiff in his trade, profession, business and office.

15 61. Defendant Facebook facilitated, published or neglected to mitigate the defamatory and
16 harassing statements and comments published by Defendant Cooper and Defendant Cooper
17 Driscoll.

18 62. As result of Defendants' actions, Plaintiff has been damaged in an amount in excess of
19 \$10,000.00.

20 63. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and,
21 therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

22 64. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these
23 claims and is entitled to any and all costs incurred herein, including, without limitation, any
24 and all attorneys' fees.

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FIFTH CAUSE OF ACTION

(False Light Defamation against Defendant Cooper and Cooper Driscoll)

65. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:
66. Defendants made a false and defamatory oral and written communication concerning Plaintiff.
67. Defendants' communication was published to a third party.
68. Defendants knew or should have known the communication was false and that it defamed Plaintiff.
69. Defendants' actions placed Plaintiff in a false light in a way that the general public would find highly offensive.
70. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.
71. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.
72. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

SIXTH CAUSE OF ACTION

(Invasion of Privacy against Defendant Cooper and Cooper Driscoll)

73. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:
74. Defendants intentionally and maliciously intruded into Plaintiff's private affairs.
75. Defendants' intrusion would be found highly offensive to the general public.

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76. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

77. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

78. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

SEVENTH CAUSE OF ACTION

(Intentional Interference with Business Relations against Defendant Cooper and Cooper Driscoll)

79. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:

80. Plaintiff conducts business as an Attorney in the State of Nevada.

81. Plaintiff previously held contracts with Defendant Facebook for marketing and advertising over the Internet.

82. Defendant Cooper and Cooper Driscoll knew or should have known of the existence of Plaintiff's business in the state of Nevada and the advertising and marketing contracts with Defendant Facebook.

83. Defendants intentionally made false claims about Plaintiff with the intent to drive business away and induce the interference with Plaintiff's contracts.

84. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

85. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

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86. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

EIGHTH CAUSE OF ACTION

(Intentional Infliction of Emotional Distress against Defendant Cooper and Cooper Driscoll)

87. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:
88. Defendants engaged in outrageous conduct wilfully and maliciously directed at Plaintiff with the intent to cause emotional distress.
89. Plaintiff suffered extreme emotional distress as a result of Defendants' intentional actions.
90. Defendants' actions were the proximate cause of Plaintiff's extreme emotional distress.
91. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.
92. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.
93. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

NINTH CAUSE OF ACTION

(Stalking against Defendant Cooper and Cooper Driscoll)

94. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:
95. Defendant Cooper and Defendant Cooper Driscoll, without lawful authority, willfully or maliciously engaged in a course of conduct that would cause a reasonable person to feel

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terrorized, frightened, intimidated, harassed or fearful for the immediate safety of a family or household member.

96. Defendants' actions caused Plaintiff to feel terrorized, frightened, intimidated, harassed or fearful for the immediate safety of a family or household member.

97. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

98. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

99. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

TENTH CAUSE OF ACTION

(Violation of U.S.C. 18 § 2511(a) against All Defendants)

100. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:

101. Defendants intentionally intercepted or endeavored to intercept , an electronic communication that was of private nature to Plaintiff.

102. Defendant Facebook facilitated, published or neglected to mitigate the wiretapping violations by Defendant Cooper and Defendant Cooper Driscoll via Defendant Facebook's internet servers.

103. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

104. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

1 105. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these
2 claims and is entitled to any and all costs incurred herein, including, without limitation, any
3 and all attorneys' fees.
4

5 **ELEVENTH CAUSE OF ACTION**

6 (Violation of U.S.C. 18 § 2511(c) against All Defendants)

7 106. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs
8 although fully incorporated herein. Plaintiff further alleges:

9 107. Defendant intentionally disclosed, or endeavored to disclose, to other persons the contents of
10 electronic communication, knowing or having reason to know that the information was
11 obtained through the interception of a wire, oral, or electronic communication in violation of
12 this subsection.

13 108. Defendant Facebook facilitated, published or neglected to mitigate the wiretapping violations
14 by Defendant Cooper and Defendant Cooper Driscoll via Defendant Facebook's internet
15 servers.
16

17 109. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of
18 \$10,000.00.

19 110. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and,
20 therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

21 111. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these
22 claims and is entitled to any and all costs incurred herein, including, without limitation, any
23 and all attorneys' fees.
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25 **TWELFTH CAUSE OF ACTION**

26 (Violation of U.S.C. 18 § 2511(e) against Defendant Cooper and Cooper Driscoll)

27 112. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs
28 although fully incorporated herein. Plaintiff further alleges:

1 113. Defendants intentionally disclosed communications unlawfully obtained in contravention of
2 U.S.C. 18 § 2511(a).

3
4 114. Defendant Facebook facilitated, published or neglected to mitigate the wiretapping violations
5 by Defendant Cooper and Defendant Cooper Driscoll via Defendant Facebook's internet
6 servers.

7 115. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of
8 \$10,000.00.

9 116. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and,
10 therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

11 117. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these
12 claims and is entitled to any and all costs incurred herein, including, without limitation, any
13 and all attorneys' fees.
14

15 **THIRTEENTH CAUSE OF ACTION**

16 (Permanent Injunction against Defendant Cooper and Cooper Driscoll)

17 118. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs
18 although fully incorporated herein. Plaintiff further alleges:

19 119. Defendants have in the past, and are likely to continue in the future, to cause serious
20 irreparable harm to Plaintiff.

21
22 120. Plaintiff is entitled to a permanent injunction against Defendants' use of Plaintiffs' name and
23 likeness in connection with false and/or misleading communications.

24 121. Plaintiff is additionally entitled to a permanent injunction against Defendants' actions that
25 constitute stalking and harassment.

26 122. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these
27 claims and is entitled to any and all costs incurred herein, including, without limitation, any
28 and all attorneys' fees.

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WHEREFORE, Plaintiff is entitled to judgment as follows:

1. For damages in excess of \$10,000.00 against each Defendant for each cause of action as alleged in the Complaint;
2. For exemplary or punitive damages against each Defendant for each cause of action as alleged in the Complaint;
3. For reasonable attorney's fees and costs;
4. For a permanent injunction against each Defendant as alleged in the Complaint; and
5. For any other relief that the Court may deem just and proper.

DATED this 27th day of October, 2010.

/s/ Jonathan B. Goldsmith, Esq.

JONATHAN B. GOLDSMITH, ESQ.
Nevada Bar No. 11805
9029 South Pecos Road, #2800
Henderson, Nevada 89074

702.386.8637 (phone)
702.385.3025 (fax)

1 **COMP**
2 JONATHAN B. GOLDSMITH, ESQ.
3 Nevada Bar No. 11805
4 **ROSENFELD & RINATO**
5 9029 South Pecos Road, #2800
6 Henderson, Nevada 89074
7 702.386.8637 (phone)
8 702.385.3025 (fax)
9 jgoldsmith@lawrosen.com
10 In Proper Person

6 DISTRICT COURT
7 CLARK COUNTY, NEVADA

8 JONATHAN B. GOLDSMITH, ESQ., an
9 Individual

10 Plaintiff,

11 vs.

12 JORDAN R. COOPER, an Individual;
13 CHERYL COOPER DRISCOLL, an
14 Individual; FACEBOOK, INC.; a Foreign
15 Corporation; DOES 1 through 5 and ROE
16 CORPORATIONS 1 through 5, inclusive,

17 Defendants.

CASE NO.

DEPT. NO.

**EXEMPT FROM ARBITRATION:
Action for Extraordinary Relief**

16 **COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF**

17 COMES NOW, Plaintiff, JONATHAN B. GOLDSMITH, ESQ. (hereinafter "Plaintiff"), in
18 Proper Person, and for his Complaint for Damages and Injunctive Relief against Defendant JORDAN
19 R. COOPER (hereinafter "Cooper"), Defendant CHERYL COOPER DRISCOLL (hereinafter "Cooper
20 Driscoll"), and Defendant FACEBOOK, INC. (hereinafter "Facebook") alleges the following.

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GENERAL ALLEGATIONS

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1. Plaintiff JONATHAN B. GOLDSMITH, ESQ., a member of the State Bar of Nevada, is, and has been for a period of more than six months prior to the filing of this action, a resident of the State of Nevada, County of Clark.
2. Upon information and belief, Defendant JORDAN R. COOPER is, and has been for a period of more than six months prior to the filing of this action, a resident of the State of Nevada, County of Clark.
3. Upon information and belief, Defendant CHERYL COOPER DRISCOLL is a resident of the State of Arizona, and has, by means of the Internet, participated and conducted tortious acts across state lines in the State of Nevada and all states with access to the Internet.
4. Upon information and belief, Defendant FACEBOOK, INC. is a foreign corporation licensed in the State of California and doing business primarily as an Internet social networking website with reach to all states with access to the Internet, including the State of Nevada.
5. Plaintiff is counsel of record in a domestic case in the Eighth Judicial District Court whereby Defendant Cooper is an opposing party.
6. Plaintiff has had no contact with Defendant Cooper or any Defendant except through his counsel of record in the aforementioned case.
7. Nevertheless, Defendants have consistently and continually committed defamation and privacy violations in addition to several other purposeful tortious acts against Plaintiff through the use of the world wide web and by other means.
8. Specifically, on or around October 1, 2010 at around 3:30 p.m., Defendant Cooper, by means of Defendant Facebook's internet social networking website, published defamatory and demeaning statements specifically directed at Plaintiff which stated: "im on to you jonathan golddick(smith) ha faggot" and further stated "he looks like a pediphile (sic)."
9. Further, Defendants published the statement of a Facebook user which stated: "ha I want to se (sic) what that douche bag looks like."

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- 1 10. Moreover, on or around October 2, 2010 at around 6:10 p.m., Defendant Cooper Driscoll, by
2 means of illegal and torious invasion of privacy, stole a private photograph depicting the likeness
3 of Plaintiff, and, by means of Defendant Facebook's internet social networking website,
4 published the stolen picture on Defendant Cooper's internet page, which is managed and
5 maintained by Defendant Facebook.
- 6 11. Defendants Cooper and Cooper Driscoll made disparaging remarks about the stolen photograph,
7 and Defendant Cooper Driscoll acknowledged that Defendants had committed unlawful and
8 tortious behavior by posting the following statement: "delete that picture already."
- 9 12. Defendant Cooper, by means of Defendant Facebook, published statements about Plaintiff,
10 including that Plaintiff is a "faggot" and a "pedophile" which constitute slander per se.
- 11 13. Defendant Cooper Driscoll, by means of Defendant Facebook, caused to be published a personal
12 and private photograph depicting the name, image and likeness of Plaintiff along with
13 disparaging statements coinciding with the stolen picture.
- 14 14. With regard to all allegations related to torts committed against Plaintiff over the internet,
15 Defendant Facebook facilitated, published or neglected to mitigate the defamatory and harassing
16 statements and comments published by Defendant Cooper and Defendant Cooper Driscoll.
- 17 15. Plaintiff, who is an attorney in the State of Nevada runs an operates a law firm in the State.
- 18 16. Much of Plaintiff's business is dependant on the public's view of Plaintiff's moral character,
19 reliability and reputation.
- 20 17. Defendants' actions have already, and will likely continue to demean and diminish Plaintiff's
21 reputation in the legal community as well as with Plaintiff's personal social community.
- 22 18. Plaintiff uses Defendant Facebook's marketing and advertising programs to advertise and market
23 Plaintiff's business.
- 24 19. As a result of Defendant's actions, Plaintiff has been forced to seize all advertising and
25 marketing through Defendant Facebook given that a diminishment of Plaintiff's reputation is
26 taking place through Defendant Facebook as a result of Defendant Cooper and Defendant Cooper
27 Driscoll's actions.
- 28 20. Plaintiff has suffered extreme emotional distress as a result of Defendant's actions.

- 1 21. Defendant Cooper has engaged in a pattern of stalking against Plaintiff.
- 2 22. Most notably, in around August, 2010, Plaintiff observed Defendant's yellow Ford mustang with
3 black stripes, with the license plate "Sage 3", parked outside of Plaintiff's law office located at
4 1212 South Casino Center Boulevard in Las Vegas, Nevada.
- 5 23. Additionally, after Plaintiff moved offices, Defendant Cooper has driven by and appeared several
6 times at Plaintiff's new office located in Henderson, Nevada while driving a red Ford Mustang.
- 7 24. Defendant Cooper Driscoll has also engaged in a pattern of stalking against Plaintiff.
- 8 25. Specifically, Defendant Cooper Driscoll created a false profile on Defendant Facebook's website
9 using a false name and false picture, in order to gain access to Plaintiff's personal and private
10 information.

11 **FIRST CAUSE OF ACTION**

12 (Slander against all Defendants)

- 13 26. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs
14 although fully incorporated herein. Plaintiff further alleges:
- 15 27. Defendants made a false and defamatory oral communication concerning Plaintiff.
- 16 28. Defendants' communication was published to a third party.
- 17 29. Defendants knew or should have known the communication was false and that it defamed
18 Plaintiff.
- 19 30. Defendants' publication of the communication was a legal cause of special damages to the
20 plaintiff.
- 21 31. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of
22 \$10,000.00.
- 23 32. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and,
24 therefore, Plaintiff is entitled to exemplary or punitive damages as a result.
- 25 33. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these
26 claims and is entitled to any and all costs incurred herein, including, without limitation, any and
27 all attorneys' fees.
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SECOND CAUSE OF ACTION

(Slander Per Se against all Defendants)

34. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:
35. Defendants made a false and defamatory oral communication concerning Plaintiff.
36. Defendants' communication was published to a third party.
37. Defendants knew or should have known the communication was false and that it defamed Plaintiff.
38. Defendants communication imputes to Plaintiff the commission of a crime and would tend to injure Plaintiff in his trade, profession, business and office
39. As result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.
40. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.
41. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

THIRD CAUSE OF ACTION

(Libel against all Defendants)

42. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:
43. Defendants made a false and defamatory written communication concerning Plaintiff.
44. Defendants' communication was published to a third party.

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- 45. Defendants knew or should have known the communication was false and that it defamed Plaintiff.
- 46. Defendants' publication of the communication was a legal cause of special damages to the plaintiff.
- 47. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.
- 48. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.
- 49. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

FOURTH CAUSE OF ACTION

(Libel Per Se against all Defendants)

- 50. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:
- 51. Defendants made a false and defamatory written communication concerning Plaintiff.
- 52. Defendants' communication was published to a third party.
- 53. Defendants knew or should have known the communication was false and that it defamed Plaintiff.
- 54. Defendants communication imputes to Plaintiff the commission of a crime and would tend to injure Plaintiff in his trade, profession, business and office
- 55. As result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

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56. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

57. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

FIFTH CAUSE OF ACTION

(False Light Defamation against Defendant Cooper and Cooper Driscoll)

58. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:

59. Defendants made a false and defamatory oral and written communication concerning Plaintiff.

60. Defendants' communication was published to a third party.

61. Defendants knew or should have known the communication was false and that it defamed Plaintiff.

62. Defendants' actions placed Plaintiff in a false light in a way that the general public would find highly offensive.

63. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

64. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

65. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

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SIXTH CAUSE OF ACTION

(Invasion of Privacy against Defendant Cooper and Cooper Driscoll)

66. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:

67. Defendants intentionally and maliciously intruded into Plaintiff's private affairs.

68. Defendants' intrusion would be found highly offensive to the general public.

69. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

70. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

71. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

SEVENTH CAUSE OF ACTION

(Intentional Interference with Business Relations against Defendant Cooper and Cooper Driscoll)

72. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:

73. Plaintiff conducts business as an Attorney in the State of Nevada.

74. Plaintiff previously held contracts with Defendant Facebook for marketing and advertising over the Internet.

75. Defendant Cooper and Cooper Driscoll knew or should have known of the existence of Plaintiff's business in the state of Nevada and the advertising and marketing contracts with Defendant Facebook.

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76. Defendants intentionally made false claims about Plaintiff with the intent to drive business away and induce the interference with Plaintiff's contracts.

77. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

78. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

79. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

EIGHTH CAUSE OF ACTION

(Intentional Infliction of Emotional Distress against Defendant Cooper and Cooper Driscoll)

80. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:

81. Defendants engaged in outrageous conduct wilfully and maliciously directed at Plaintiff with the intent to cause emotional distress.

82. Plaintiff suffered extreme emotional distress as a result of Defendants' intentional actions.

83. Defendants' actions were the proximate cause of Plaintiff's extreme emotional distress.

84. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

85. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

86. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

1 **NINTH CAUSE OF ACTION**

2 (Stalking against Defendant Cooper and Cooper Driscoll)

3
4 87. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs
5 although fully incorporated herein. Plaintiff further alleges:

6 88. Defendant Cooper, without lawful authority, willfully or maliciously engages in a course of
7 conduct that would cause a reasonable person to feel terrorized, frightened, intimidated,
8 harassed or fearful for the immediate safety of a family or household member.

9 89. Defendants' actions caused Plaintiff to feel terrorized, frightened, intimidated, harassed or
10 fearful for the immediate safety of a family or household member.

11 90. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of
12 \$10,000.00.

13 91. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and,
14 therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

15 92. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these
16 claims and is entitled to any and all costs incurred herein, including, without limitation, any
17 and all attorneys' fees.

18 **TENTH CAUSE OF ACTION**

19 (Violation of U.S.C. 18 § 2511(a) against Defendant Cooper and Cooper Driscoll)

20
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22 93. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs
23 although fully incorporated herein. Plaintiff further alleges:

24 94. Defendants intentionally intercepted or endeavored to intercept , an electronic
25 communication that was of private nature to Plaintiff.

26 95. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of
27 \$10,000.00.
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96. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

97. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

ELEVENTH CAUSE OF ACTION

(Violation of U.S.C. 18 § 2511(e) against Defendant Cooper and Cooper Driscoll)

98. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:

99. Defendants intentionally disclosed communications unlawfully obtained in contravention of U.S.C. 18 § 2511(a).

100. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

101. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

102. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

TWELFTH CAUSE OF ACTION

(Permanent Injunction against Defendant Cooper and Cooper Driscoll)

103. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:

104. Defendants have in the past, and are likely to continue in the future, to cause serious irreparable harm to Plaintiff.

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105. Plaintiff is entitled to a permanent injunction against Defendants' use of Plaintiffs' name and likeness in connection with false and/or misleading communications.

106. Plaintiff is additionally entitled to a permanent injunction against Defendants' actions that constitute stalking and harassment.

107. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

WHEREFORE, Plaintiff is entitled to judgment as follows:

1. For damages in excess of \$10,000.00 against each Defendant for each cause of action as alleged in the Complaint;
2. For exemplary or punitive damages against each Defendant for each cause of action as alleged in the Complaint;
3. For reasonable attorney's fees and costs;
4. For a permanent injunction against each Defendant as alleged in the Complaint; and
5. For any other relief that the Court may deem just and proper.

DATED this 5th day of October, 2010.

/s/ Jonathan B. Goldsmith, Esq.

JONATHAN B. GOLDSMITH, ESQ.
Nevada Bar No. 11805
ROSENFELD & RINATO
9029 South Pecos Road, #2800
Henderson, Nevada 89074
702.386.8637 (phone)
702.385.3025 (fax)

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VERIFICATION

State of Nevada)

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ss:

County of Clark)

I, Jonathan B. Goldsmith, Esq., under the penalty of perjury, do hereby swear and affirm that all allegations contained in Plaintiff's Complaint are made from fact and personal knowledge, unless made by information and belief, in which case are stated to be made by information and belief.

Dated this 5th day of October, 2010

/s/ Jonathan B. Goldsmith, Esq.

JONATHAN B. GOLDSMITH, ESQ.

Exhibit “2”

Wall Photos
Updated about a week ago



baby sage
Updated about 2 months ago





Links
2 links See All


2011 Mustang GT 5.0L 4V Runs 10.58@127MPH! 1:27pm Aug 23


half bonds las vegas 11:59am Aug 19


Facebook © 2010 · English (US)


-  **Jordan Cooper** He looks like a pedophile
Saturday at 2:41pm


-  **Andrew Easter** Corky Romano....
Saturday at 3:01pm


-  **Ziles Thomas** lol thats funny shit
Saturday at 9:31pm


-  **Jordan Cooper** well im off to get my stupid 12 week patch.
September 30 at 11:11am


-  **Tyler Grinstead** Dislike. Boooo
September 30 at 11:17am


-  **Jordan Cooper** first i had to pay \$124 for a full drug test, now i gotta pay \$190 to wear a stupid 12 week monitoring patch for smoking weed. FML
September 30 at 10:10am

-  **Ana Karen Martinez** Wow
September 30 at 10:30am

-  **Jordan Cooper** i know :/
September 30 at 10:41am

-  **Ana Karen Martinez** Ugh I can't stand her.for.that
September 30 at 10:44am

-  **Andrew Easter** Dont worry, just because she threw this smoking weed thing a the court doesnt mean a damn thing. You got through without smoking before, just get through the next three months, do it for Sage
September 30 at 11:12am

-  **Cheryl Cooper Driscoll** just don't smoke it already! Problem solved.
September 30 at 11:59am


Report/Block this Person


Share



About · Advertising · Developers · Careers · Privacy · Terms · Help


RECENT ACTIVITY


Jordan commented on Cory Chavez's status.
Jordan commented on Jennifer Dooley's status.

-  **Jordan Cooper** goodnight my sage, i love you
September 29 at 12:09am
2 people like this.

-  **Jordan Cooper** another lonely night at home :/ wish i was next to you...
September 28 at 10:35pm
View all 39 comments

-  **Cheryl Cooper Driscoll** Good luck today!
September 28 at 7:46am
 **Andrew Easter** Now you have Durante
September 28 at 10:15am

-  **Durant Donovan** Oh! What time on Wednesday would be good for you?
September 27 at 5:03pm
Andrew Easter likes this.

-  **Jordan Cooper** id say about noon, then we could grab some lunch together :)
September 28 at 10:37pm

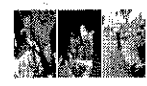
RECENT ACTIVITY

Jordan is now friends with Bryce Teepen and 2 other people.



Jordan and Ross LaMarca are now friends. · Add Ross as Friend

Jordan is now friends with Sean Yontz and 2 other people.




-  **Jordan Cooper** Happy 1st birthday to my beautiful daughter sage.
September 26 at 2:03pm via Facebook for Android
6 people like this.

Exhibit “3”

Chat (89)

Search

Home Profile Account



Send Samantha a Message
Poke Samantha

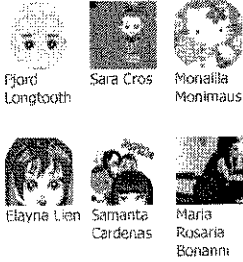
Are you the one for me?

Information

Birthday:
June 17, 1989
Current City:
Henderson, NV

Friends

199 friends See All



Likes

1 likes



- Suggest Friends
- Remove from Friends
- Report/Block this Person

Share

Samantha Witherspoon Looking for new friends today! on Thursday

Wall Info Photos

Write something...

Attach: Share

Filters



Samantha Witherspoon



Samantha has started making a Cottage Gold Windmill in YoVille!
Samantha is trying to make a Cottage Gold Windmill and needs their friends to send them some materials.

21 hours ago via YoVille · Comment · Like · Send Material

Create an Ad

ABA Diversity Moot Court
www.abanet.org



First Amendment & Media Law Diversity Moot Court Competition Argue a media law case. Win a trip to Palm Springs, CA... Register now!

Chat (89)

Samantha Witherspoon



Samantha needs more energy to do jobs in YoVille!

Samantha may run out of energy and is collecting more to keep doing jobs.

21 hours ago via YoVille · Comment · Like · Send Energy & Get Energy



Samantha Witherspoon Looking for new friends today!

September 23 at 3:39pm · Comment · Like

RECENT ACTIVITY

Samantha is now friends with Nicol Rosal and 7 other people.



Samantha likes Unnamed App (Application). · Like

Samantha and Robbin Rosal are now friends. · Comment · Like · Add Robbin as Friend

Samantha and Thomas Percy are now friends. · Comment · Like · Add Thomas as Friend

Samantha is now friends with Camila Rincon and 10 other people.



Samantha Witherspoon



Samantha needs more energy to do jobs in YoVille!

Samantha may run out of energy and is collecting more to keep doing jobs.

September 15 at 8:07pm via YoVille · Comment · Like · Send Energy & Get Energy

Monica Hartman likes this.

Write a comment...



Samantha Witherspoon



Samantha needs more energy to do jobs in YoVille!

Samantha may run out of energy and is collecting more to keep doing jobs.

September 12 at 3:39am via YoVille · Comment · Like · Send Energy & Get Energy

Salli Jones likes this.

Write a comment...



Samantha Witherspoon



Samantha needs more energy to do jobs in YoVille!

Samantha may run out of energy and is collecting more to keep doing jobs.

September 9 at 3:05am via YoVille · Comment · Like · Send Energy & Get Energy

Hazel Letting likes this.

Write a comment...



Samantha Witherspoon



Energy Found!

Samantha found a Bucket of Energy Drinks in YoVille and wants to share them with friends. Energy helps you complete jobs and work in the factory.

September 9 at 3:05am via YoVille · Comment · Like · Get Energy

Hazel Letting likes this.

Write a comment...

Peace Corps Hiring in Las Vegas



77 countries. Now hiring. RSVP now and meet a recruiter to learn more: Tuesday, Oct. 5, 5:30PM, West Las Vegas Library
RSVP to this event

Want to Learn Kabbalah?



Watch 100s of hours of video classes online. Learn about topics like Meditation, Love, Relationships, Creation, Astrology, and more.

More Ads

Chat (89)



Samantha Witherspoon



Samantha hit a Jackpot in YoVille!

Samantha won a big jackpot while playing the new YoVille Daily Spin Slot Machine! They want to share the good fortune by giving friends a free spin.

September 9 at 3:05am via YoVille · Comment · Like · Get Free Spin

Hazel Letting likes this.

Write a comment...



Samantha Witherspoon



Lost Panther!

Samantha found a sad panther. He needs a happy, healthy home until Samantha finds his owner!

September 5 at 2:48pm via YoVille · Comment · Like · Help the panther



Samantha Witherspoon



Samantha needs more energy to do jobs in YoVille!

Samantha may run out of energy and is collecting more to keep doing jobs.

September 5 at 2:46pm via YoVille · Comment · Like · Send Energy & Get Energy



Samantha Witherspoon



Energy Found!

Samantha found a Bucket of Energy Drinks in YoVille and wants to share them with friends. Energy helps you complete jobs and work in the factory.

September 5 at 2:46pm via YoVille · Comment · Like · Get Energy

3 people like this.

Write a comment...



Samantha Witherspoon



Samantha hit a Jackpot in YoVille!

Samantha won a big jackpot while playing the new YoVille Daily Spin Slot Machine! They want to share the good fortune by giving friends a free spin.

September 5 at 2:38pm via YoVille · Comment · Like · Get Free Spin



Samantha Witherspoon



Samantha hit a Jackpot in YoVille!

Samantha won a big jackpot while playing the new YoVille Daily Spin Slot Machine! They want to share the good fortune by giving friends a free spin.

August 29 at 7:51pm via YoVille · Comment · Like · Get Free Spin



Samantha Witherspoon



Samantha hit a Jackpot in YoVille!

Samantha won a big jackpot while playing the new YoVille Daily Spin Slot Machine! They want to share the good fortune by giving friends a free spin.

August 29 at 6:03pm via YoVille · Comment · Like · Get Free Spin



Samantha Witherspoon

Samantha needs more energy to do jobs in YoVille!

Samantha may run out of energy and is collecting more to keep doing jobs.

Chat (89)



August 29 at 6:02pm via YoVille · Comment · Like · Send Energy & Get Energy



Samantha Witherspoon

Mystery Keys Found!

Samantha found a mysterious set of keys in YoVille and is sharing them with friends! Locked mystery chests can be opened using these keys!



August 25 at 4:07am via YoVille · Comment · Like · Claim Mystery Keys

Hazel Letting likes this.

Write a comment...



Samantha Witherspoon

Energy Found!

Samantha found a Bucket of Energy Drinks in YoVille and wants to share them with friends. Energy helps you complete jobs and work in the factory.



August 25 at 4:05am via YoVille · Comment · Like · Get Energy



Samantha Witherspoon

Samantha needs more energy to do jobs in YoVille!

Samantha may run out of energy and is collecting more to keep doing jobs.



August 25 at 4:05am via YoVille · Comment · Like · Send Energy & Get Energy

Hazel Letting likes this.

Write a comment...



Samantha Witherspoon

Energy Found!

Samantha found a Bucket of Energy Drinks in YoVille and wants to share them with friends. Energy helps you complete jobs and work in the factory.



August 25 at 4:04am via YoVille · Comment · Like · Get Energy



Samantha Witherspoon

Energy Found!

Samantha found a Bucket of Energy Drinks in YoVille and wants to share them with friends. Energy helps you complete jobs and work in the factory.



August 20 at 7:48pm via YoVille · Comment · Like · Get Energy



Samantha Witherspoon

Energy Found!

Samantha found a Bucket of Energy Drinks in YoVille and wants to share them with friends. Energy helps you complete jobs and work in the factory.



August 20 at 7:48pm via YoVille · Comment · Like · Get Energy



Samantha Witherspoon

Samantha needs more energy to do jobs in YoVille!

Samantha may run out of energy and is collecting more to keep doing jobs.



Chat (89)

August 20 at 7:17pm via YoVille · Comment · Like · Send Energy & Get Energy

2 people like this.

Write a comment...

RECENT ACTIVITY

Samantha is now friends with Maitena Guevara Lynch and 10 other people.



Samantha is now friends with Stefani Lambert and 5 other people.



Order Posts