

1. IN THE UNITED STATES DISTRICT COURT CASE #

PLAINTIFF: Clifford Ray Hackett Gen Del, Hilo, HI 96720

DEFENDANT: Facebook 1Hacker Way, Menlo Park, CA, 94025

MODIFIED COMPLAINT

1. This Court has subject matter jurisdiction under 28 U.S.C. sections 1331 and 1343.
2. This action is commenced pursuant to 2201 and 2202 and 42 U.S.C., section 1983.

GENERAL ALLEGATIONS

3. Plaintiffs are citizen of the United States of America.
4. Defendant owns a commercial business
5. Plaintiffs are individuals with disabilities. Defendant's business blocks disabled persons.
6. On July 26, 1990, Congress enacted the ADA, 42 U.S.C. section 12101, et seq.
7. The Congressional findings include: "discrimination persists "42 U.S.C. section 12101(a).
8. Congress says ADA is to: mandate "standards" 42 U.S.C. section 12101(b).
9. Congress gave time to implement the Act. The effective date was January 26, 1992.
10. Defendant's business has barriers that block disabled persons.
11. ADA Title III, covers "Public Accommodations and Services." 42 U.S.C. section 12181.
12. Congress included businesses as public accommodations. 42 U.S.C. section 12181.
13. Defendant's business is discriminating by not USING EMAIL VERIFY
14. The barrier removal is."readily achievable" 42 U.S.C.. section 12182(b)(2)(A)(iv).
15. Readily achievable removing barriers 28 C.F.R.. section 36.304(a) - (c).
16. Similar businesses have made similar modifications, but defendant chose not to comply.
17. In Section 44 and 190 of the IRS Code, businesses get a tax credit of 50% of the cost
18. Plaintiff wants to use the defendant's business.

CLAIM FOR RELIEF:

19. Pursuant to the ADA, 42 U.S.C. section 12101, et seq., and law pursuant to this Act, 28 C.F.R. §36.304, defendant was to remove barriers by January 26, 1992. Defendant has not.
20. By failing to remove barriers defendant violates the ADA.

WHEREFORE, the plaintiffs pray that the Court order the defendant to remove barriers BY USING EMAIL VERIFY and pay plaintiffs attorney fees and such relief as may be just, proper, and equitable.

I HEREBY CERTIFY that a true copy of the foregoing was sent to the other party the same day it was sent to this court.

