

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CASSANDRA FAIRBANKS, an individual,)



Plaintiff,)

v.)

EMMA ROLLER, an individual,)



Defendant.)

Civil Action No.: 1:17-cv-1052

(Jury Trial Demanded)

COMPLAINT

A reporter (Emma Roller, a reporter for Fusion) with a loud megaphone to the world and a prominent platform from which to use it, defamed another writer, commentator and journalist. Even when others corrected the defamation, Roller refused until the eve of this suit. This suit follows.

INTRODUCTION

Many members of prominent media organizations see themselves as the exclusive arbiters of truth. Protecting their self-declared monopoly, many of these “journalists” use their perch of public influence to defame, slander and libel those they disagree with politically and ideologically. They see the First Amendment as a sword, not a shield; they view the First Amendment as only protecting those with elites on their rolodex, and view the First Amendment as a wholly owned property of elite-backed journalists to smear and slime their adversaries at will with libels and defamation. In fact, the First Amendment’s foundations rest on the cornerstones of independent, outsider writers, scribes, advocates and journalists, from Thomas

Paine to Thomas Jefferson, almost always resisted by the establishment courtiers of, and courtesans to, the truth-corrupted power of their day. The First Amendment is meant to protect the Cassandra Fairbanks' of the journalism world: independent, alternative voices of truth in a sea of fake news. It is in this context that this suit arises.

Emma Roller, of Fusion, told the world that Fairbanks flashed a “white power” signal to the world from the media center of the White House. Roller went further, factually telling the world this “white power” signal had been identified as such by the Anti-Defamation League. What was this “white power” signal? The “ok” hand signal. Within days of this false story by Roller — spread to the world through her twitter account, and then throughout the internet — the ADL itself denounced this claim as a “hoax” noting that the “ok” sign had “never” been a white power signal. Did Roller correct her defamation of Cassandra Fairbanks? No. Instead, on the eve of learning of this lawsuit, Roller deleted the tweet, and tried to destroy the evidence of her saying what she said, and doing what she did. This suit followed.

JURISDICTION AND VENUE

1. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332 as complete diversity exists and the matter in controversy exceeds \$75,000, exclusive of interest and costs.
2. This Court has personal jurisdiction over the Defendant because the false and defamatory statement made by Defendant was published in the District of Columbia and the Defendant resides within the District of Columbia.
3. Venue is proper in this District under 28 U.S.C. § 1391(b) because all or a substantial portion of the events that gave rise to Plaintiff's claims transpired in the District of Columbia, including the publication of the defamatory falsehood and damage to Plaintiff's reputation.

THE PARTIES

4. Plaintiff Cassandra Fairbanks is a reporter for Bigleaguepolitics.com, a political activist, and a resident [REDACTED]

5. Defendant Emma Roller is a senior politics reporter at Fusion.net and a resident [REDACTED]. [REDACTED] Defendant has a Twitter.com following of approximately 23,000 people.

STATEMENT OF FACTS

6. On April 28, 2017, Defendant Emma Roller published a photo via her Twitter account of the Plaintiff under a caption Roller wrote: "just two people doing a white power hand gesture in the White House."
7. On April 28, 2017, Roller further published a claim that the Anti-Defamation League ("ADL") identified Fairbanks' hand signal as a two-handed hand sign wherein one hand forms a letter "W" and the other hand forms a letter "P," to represent "WP" or "White Power."
8. On April 28, 2017, and in the days thereafter, Roller's post was republished across the web, re-shared by other Twitter users at least 6,827 times, received at least 7,169 "likes" from other Twitter users, and the story was picked up by major news outlets including The Independent.
9. Roller's story led to republishing of the story across the world, as a leading article on Yahoo, and pervaded the social media press. Of note, no serious publication in America republished the false story by Roller, and Fusion itself refused to publish the false story by its own reporter.
10. The ADL rebuked Roller's claim a few days later, publishing an article on May 1, 2017, making clear they had never called the hand signal used by Fairbanks (the "OK" gesture) as a white power symbol. Despite this, Roller failed to issue a retraction or correction.
11. Roller knew at the time of her publishing that Fairbanks was a long-time civil rights writer, journalist, and advocate, who backed Trump's candidate for the Presidency only also after protesting civil rights violations against a wide range of citizens, including women and African-Americans, and had previously backed Bernie Sanders presidential

bid. Roller knew Fairbanks was not using “white power” signals before she published her false stories on April 28, 2017.

12. Roller knew her story was false when the ADL rebuked the very basis of her claims, yet Roller still refused to retract or correct the story at any time. Instead, upon the eve of filing suit, Roller tried to erase her tracks, deleting her published stories about this, and yet not correcting anything for the world to know the truth.

COUNT I: DEFAMATION (LIBEL)

13. Plaintiff re-alleges and incorporates by reference paragraphs 1 through 12 of this Complaint as if fully set forth herein.
14. Defendant wrote and published on her Twitter page the defamatory caption over Plaintiff’s photo falsely accusing Plaintiff of making a white power hand gesture.
15. Defendant published the caption without privilege and without Plaintiff’s consent.
16. The serious nature of the allegation that Plaintiff made a white power hand gesture should have heightened Defendant’s due diligence in confirming the veracity of the claim before publishing the caption. Defendant acted with actual malice when she published the caption either with actual knowledge that the caption was not true or with reckless disregard as to its truth. At a minimum, Defendant failed to exercise reasonable care when she published such a serious allegation against the Plaintiff.
17. By falsely claiming that the Plaintiff made a white power hand gesture, the Defendant insinuated that the Plaintiff held white supremacist beliefs and has proximately caused injury to Plaintiff’s professional reputation and credibility. Specifically, the caption has caused Plaintiff to suffer in the following manner:
 - a. Damage to her personal and professional reputation in the United States, and worldwide;
 - b. Damage to her business opportunities in the United States, and worldwide;

c. A false implication and innuendo attached to her reputation, one won on civil rights advocacy for more than a decade, that she holds white supremacist beliefs;

d. Being subjected to unwanted negative media attention and online harassment.

18. Even after the Plaintiff informed the Defendant in writing that she did not make a white power hand gesture, the Defendant failed to retract the caption.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against the Defendant, issue injunctive relief, including that Defendant issue a retraction, issue declaratory relief, that the Defendant declare that her statement was in fact defamation, monetary relief in an amount to be determined at trial, pre-judgment interest, and grant such other further relief that the Court deems appropriate.

COUNT II: FALSE LIGHT INVASION OF PRIVACY

19. Plaintiff re-alleges and incorporates by reference paragraphs 1 through 12 of this Complaint as if fully set forth herein.

20. Defendant wrote and published on her Twitter page the defamatory caption over Plaintiff's photo falsely accusing Plaintiff of making a white power hand gesture and falsely insinuating that Plaintiff held white supremacist beliefs.

21. As soon as Defendant published the caption it immediately became accessible to the entire Internet, to Defendant's approximately 23,000 followers, was re-shared by other Twitter users at least 6,827 times, received at least 7,169 "likes" from other Twitter users, and the story was picked up by major news outlets including Fox News and United Kingdom based magazine The Independent, with the article published by Independent being shared at least 20,000 times.

22. The caption contains a false and defamatory allegation about the Plaintiff that insinuates that the Plaintiff holds beliefs she does not hold and that has the effect of placing Plaintiff in a false light, specifically, that she is a white supremacist. Such false light is highly offensive to a reasonable person.

23. Defendant published the caption without privilege and without Plaintiff's consent.
24. The serious nature of the allegation that Plaintiff made a white power hand gesture should have heightened Defendant's due diligence in confirming the veracity of the claim before publishing the caption. Defendant acted with actual malice when she published the caption either with actual knowledge that the caption was not true or with reckless disregard as to its truth. At a minimum, Defendant failed to exercise reasonable care when she published such a serious allegation against the Plaintiff.
25. Even after the Plaintiff informed the Defendant in writing that she did not make a white power hand gesture, the Defendant failed to retract the caption.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against the Defendant, issue injunctive relief, including that Defendant issue a retraction, issue declaratory relief, that the Defendant declare that her statement was in fact defamation, monetary relief in an amount to be determined at trial, pre-judgment interest, and grant such other further relief that the Court deems appropriate.

COUNT III: INTENTIONAL INFLICTION OF EMOTIONAL HARM

26. Plaintiff re-alleges and incorporates by reference paragraphs 1 through 12 of this Complaint as if fully set forth herein.
27. Defendant's choice to write and publish on her Twitter page the defamatory caption over Plaintiff's photo falsely accusing Plaintiff of making a white power hand gesture and falsely insinuating that Plaintiff held white supremacist beliefs occurred intentionally and with a desire to harm Plaintiff.
28. How Defendant sought to harm Plaintiff, including the publication of a false and defamatory statement about Plaintiff to a worldwide audience, was extreme and outrageous.
29. Because of the actions of Defendant, including the resulting mass harassment campaign experienced by Plaintiff, Plaintiff has experienced extreme emotional distress.

30. Because of the actions of Defendant, the character and reputation of Plaintiff were harmed, her standing and reputation among the community were impaired, she suffered financially, and she experienced undue and unnecessary stress.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against the Defendant, issue injunctive relief, including that Defendant issue a retraction, issue declaratory relief, that the Defendant declare that her statement was in fact defamation, monetary relief in an amount to be determined at trial, pre-judgment interest, and grant such other further relief that the Court deems appropriate.

COUNT IV: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

31. Plaintiff re-alleges and incorporates by reference paragraphs 1 through 12 of this Complaint as if fully set forth herein.

32. Defendant's choice to write and publish on her Twitter page the defamatory caption over Plaintiff's photo falsely accusing Plaintiff of making a white power hand gesture and falsely insinuating that Plaintiff held white supremacist beliefs occurred as result of Defendant's negligence.

33. The manner by which Defendant sought to harm Plaintiff, including the publication of a false and defamatory statement about Plaintiff to a worldwide audience, was extreme and outrageous.

34. Because of the actions of Defendant, including the resulting mass harassment campaign experienced by Plaintiff, Plaintiff has experienced extreme emotional distress.

35. Because of the actions of Defendant, the character and reputation of Plaintiff were harmed, her standing and reputation among the community were impaired, she suffered financially, and she suffered mental anguish and personal humiliation.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against the Defendant, issue injunctive relief, including that Defendant issue a retraction, issue declaratory relief, that the Defendant declare that her statement was in fact defamation,

monetary relief in an amount to be determined at trial, pre-judgment interest, and grant such other further relief that the Court deems appropriate.

PRAYER FOR RELIEF

Wherefore, Plaintiff Cassandra Fairbanks respectfully prays for judgment as follows:

- A. For injunctive relief requiring Defendant to publish a retraction stating that Plaintiff did not make a white power hand gesture in her photo published on April 28, 2017, and that Plaintiff does not hold white supremacist views;
- B. For declaratory relief requiring Defendant declare that her statement claiming Plaintiff made a white power hand gesture was in fact defamation;
- C. For monetary relief in an amount of at least \$100,000.00, or in an amount to be determined at trial;
- D. For prejudgment interest as allowed by law;
- E. For costs of suit incurred herein;
- F. For reasonable attorney's fees; and

For such other and further relief as this Court deems just and proper.

JURY DEMAND

Plaintiff demands trial by jury on all issues so triable.

DATED: June 1, 2017

Respectfully submitted,
Cassandra Fairbanks
By Counsel

/s/ Robert E. Barnes
Robert E. Barnes, Esq.
(Pro hac vice admission to be sought)
BARNES LAW
601 South Figueroa Street, Suite 4050
Los Angeles, California 90017
Telephone: (310) 510-6211
Facsimile: (310) 510-6225
E-mail: robertbarnes@barneslawllp.com

/s/ Daniel D. Mauler
Daniel D. Mauler (D.C. Bar No. 977757)
REDMON, PEYTON & BRASWELL, LLP
510 King Street, Suite 301
Alexandria, Virginia 22314
703-684-2000 (Tel)
703-684-5109 (Fax)
dmauler@rpb-law.com

Counsel for Plaintiff Cassandra Fairbanks

CIVIL COVER SHEET

JS-44 (Rev. 6/17 DC)

<p>I. (a) PLAINTIFFS Cassandra Fairbanks</p> <div style="background-color: black; height: 50px; width: 100%;"></div>	<p>DEFENDANTS Emma Roller</p> <p>COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____ (IN U.S. PLAINTIFF CASES ONLY) <small>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</small></p>
<p>(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)</p> <p>Daniel D. Mauler Redmon, Peyton & Braswell, LLP 510 King Street, Suite 301, Alexandria, VA 22314 (703) 684-2000</p>	<p>ATTORNEYS (IF KNOWN)</p>

IV. CASE ASSIGNMENT AND NATURE OF SUIT

(Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)

<p><input type="radio"/> A. Antitrust</p> <p><input type="checkbox"/> 410 Antitrust</p>	<p><input checked="" type="radio"/> B. Personal Injury/ Malpractice</p> <p><input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" 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 <input type="checkbox"/> 362 Medical Malpractice <input type="checkbox"/> 365 Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Product Liability</p>	<p><input type="radio"/> C. Administrative Agency Review</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><u>Social Security</u> <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))</p> <p><u>Other Statutes</u> <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)</p>	<p><input type="radio"/> D. Temporary Restraining Order/Preliminary Injunction</p> <p>Any nature of suit from any category may be selected for this category of case assignment.</p> <p>*(If Antitrust, then A governs)*</p>
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E. General Civil (Other)

OR

F. Pro Se General Civil

<p><u>Real Property</u> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent, Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property</p> <p><u>Personal Property</u> <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</p>	<p><u>Bankruptcy</u> <input type="checkbox"/> 422 Appeal 27 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p><u>Prisoner Petitions</u> <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Conditions <input type="checkbox"/> 560 Civil Detainee – Conditions of Confinement</p> <p><u>Property Rights</u> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent – Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark</p>	<p><u>Federal Tax Suits</u> <input type="checkbox"/> 870 Taxes (US plaintiff or defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609</p> <p><u>Forfeiture/Penalty</u> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other</p> <p><u>Other Statutes</u> <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 430 Banks & Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation</p>	<p><input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organization <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Satellite TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions (if not administrative agency review or Privacy Act)</p>
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<input type="radio"/> G. Habeas Corpus/ 2255 <input type="checkbox"/> 530 Habeas Corpus – General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus – Alien Detainee	<input type="radio"/> H. Employment Discrimination <input type="checkbox"/> 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) *(If pro se, select this deck)*	<input type="radio"/> I. FOIA/Privacy Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	<input type="radio"/> J. Student Loan <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (excluding veterans)
<input type="radio"/> K. Labor/ERISA (non-employment) <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="radio"/> L. Other Civil Rights (non-employment) <input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 Americans w/Disabilities – Employment <input type="checkbox"/> 446 Americans w/Disabilities – Other <input type="checkbox"/> 448 Education	<input type="radio"/> M. Contract <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"/> 153 Recovery of Overpayment of Veteran’s Benefits <input type="checkbox"/> 160 Stockholder’s Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="radio"/> N. Three-Judge Court <input type="checkbox"/> 441 Civil Rights – Voting (if Voting Rights Act)

V. ORIGIN
 1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify)
 6 Multi-district Litigation
 7 Appeal to District Judge from Mag. Judge
 8 Multi-district Litigation – Direct File

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)
 28 USC sec. 1332 (Diversity) - Defamation and Libel

VII. REQUESTED IN COMPLAINT	CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 <input type="checkbox"/>	DEMAND \$ 100,000	JURY DEMAND: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
VIII. RELATED CASE(S) IF ANY	(See instruction)	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	If yes, please complete related case form

DATE: June 1, 2017	SIGNATURE OF ATTORNEY OF RECORD: /s/ Daniel D. Mauler
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INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services 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. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil cover sheet. These tips coincide with the Roman Numerals on the cover sheet.

- I.** COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III.** CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV.** CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI.** CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII.** RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk’s Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
District of Columbia

Cassandra Fairbanks

Plaintiff(s)

v.

Emma Roller

Defendant(s)

Civil Action No. 1:17-cv-1052

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Emma Roller



A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Daniel D. Mauler, Esq.
Redmon, Peyton & Braswell, LLP
510 King Street, Suite 301
Alexandria, VA 22314

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. 1:17-cv-1052

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: