

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA**

ASHLEY FRANK,
Plaintiff,

v.

GOOGLE LLC,
Defendant.

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, ASHLEY FRANK ("Plaintiff"), proceeding pro se, sues Defendant, GOOGLE LLC ("Google" or "Defendant"), and alleges as follows:

I. PARTIES

1. Plaintiff Ashley Frank is a natural person and resident of Palm Beach County, Florida, residing at 17646 Sparkling River Road, Boca Raton, Florida 33496.
2. Defendant Google LLC is a Delaware limited liability company with its principal place of business in Mountain View, California, and conducts substantial business in the State of Florida, including operating Google Voice and related telecommunications platforms accessible to Florida residents.

II. JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction pursuant to Article V of the Florida Constitution and Florida Statutes § 26.012.
4. This Court has personal jurisdiction over Defendant pursuant to Florida's long-arm statute, Fla. Stat. § 48.193, because Defendant conducts business in Florida and committed tortious acts causing injury within the State of Florida.
5. Venue is proper in Palm Beach County because Plaintiff resides in this County and the injuries complained of were suffered in this County.

III. GENERAL FACTUAL ALLEGATIONS

6. Plaintiff is not a subscriber, user, or customer of Google Voice and has never created, controlled, or benefited from any Google Voice account.
7. At all relevant times, third parties used Google Voice to place repeated communications impersonating a United States law enforcement or governmental authority.
8. These communications originated from outside the United States, including from Pakistan, and were directed at Plaintiff in Palm Beach County, Florida.
9. The communications were deceptive, intimidating, and coercive in nature, and caused Plaintiff fear, emotional distress, anxiety, and disruption of daily life.
10. Google Voice is a platform owned, operated, and controlled by Defendant that enables users to obtain telephone numbers and place calls with limited identity verification and limited safeguards against misuse.
11. Google publicly represents that it prohibits impersonation, fraud, spoofing, and harassment on its platforms, including Google Voice.
12. Plaintiff notified Google of the impersonation and abusive conduct and provided notice sufficient to alert Google to the foreseeable risk of continued harm.

13. Despite receiving notice, Google failed to take reasonable and timely action to prevent continued misuse of its platform, failed to disable or meaningfully investigate the offending accounts, and failed to provide Plaintiff with protection, warning, or mitigation.

14. The abusive and impersonating conduct continued after notice to Google.

15. Plaintiff suffered emotional distress, fear for personal safety, invasion of privacy, loss of peace of mind, disruption of daily activities, and expended time and resources responding to the abuse.

16. Plaintiff attempted to initiate arbitration with the American Arbitration Association. The arbitration was administratively closed due to the absence of any mutual arbitration agreement between the parties, not on the merits of Plaintiff's claims.

17. Plaintiff brings this action in tort, based on Defendant's post-notice operational negligence, independent of any contract or terms of service.

IV. COUNT I – NEGLIGENCE (POST-NOTICE OPERATIONAL NEGLIGENCE)

18. Plaintiff realleges paragraphs 1 through 17 as if fully set forth herein.

19. Defendant owed Plaintiff a duty to exercise reasonable care in the operation, monitoring, and post-notice handling of its Google Voice platform to prevent foreseeable harm to non-users targeted by impersonation, fraud, and harassment facilitated through the platform.

20. Defendant breached its duty of care by failing to take reasonable action after notice, failing to disable offending accounts, failing to implement safeguards, and continuing to operate the platform in a manner allowing foreseeable harm to persist.

21. Defendant's breaches were a direct and proximate cause of Plaintiff's injuries.

22. Plaintiff suffered emotional distress, anxiety, fear, invasion of privacy, and other damages to be proven at trial.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment in her favor, compensatory damages, costs, and such further relief as the Court deems just and proper.

VI. JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

DATED: January 20, 2026

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