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UNITED STATES DISTRICT COURT

for the

Northern District of Georgia

Atlanta Division

RAISSA DJUISSI KENGNE
570 PIEDMONT AVE NE #55166
ATLANTA, GA 30308

Plaintiff(s)
(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

ID.ME, INC.
COGENCY GLOBAL INC.
250 Browns Hill Ct,
Midlothian, VA, 23114 - 9510, USA

Defendant(s)
(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 1:22-CV-2237
(to be filled in by the Clerk's Office)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	RAISSA DJUISSI KENGNE
Street Address	570 PIEDMONT AVE NE #55166
City and County	ATLANTA, FULTON COUNTY
State and Zip Code	GA 30308
Telephone Number	404-932-1651
E-mail Address	CIANESEYA2022@GMAIL.COM

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name: ID.ME, INC. (Registered Agent: COGENCY GLOBAL INC.)
Job or Title *(if known)*:
Street Address: 250 Browns Hill Ct.
City and County: Midlothian, CHESTERFIELD COUNTY
State and Zip Code: VA, 23114 - 9510
Telephone Number:
E-mail Address *(if known)*:

Defendant No. 2

Name: Not Applicable
Job or Title *(if known)*:
Street Address:
City and County:
State and Zip Code:
Telephone Number:
E-mail Address *(if known)*:

Defendant No. 3

Name: Not Applicable
Job or Title *(if known)*:
Street Address:
City and County:
State and Zip Code:
Telephone Number:
E-mail Address *(if known)*:

Defendant No. 4

Name: Not Applicable
Job or Title *(if known)*:
Street Address:
City and County:
State and Zip Code:
Telephone Number:
E-mail Address *(if known)*:

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than $75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☑ Federal question ☑ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 U.S.C. § 1104 Unemployment Trust Fund
26 U.S.C. 3301 et seq. Federal Unemployment Tax Act
O.C.G.A. § 34-8-45 Supplemental unemployment benefits

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* RAISSA DJUISSI KENGNE, is a citizen of the State of *(name)* GEORGIA.

b. If the plaintiff is a corporation

The plaintiff, *(name)* Not Applicable, is incorporated under the laws of the State of *(name)* Not Applicable, and has its principal place of business in the State of *(name)* Not Applicable.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* Not Applicable, is a citizen of the State of *(name)* Not Applicable. Or is a citizen of *(foreign nation)* Not Applicable.

b. If the defendant is a corporation

The defendant, *(name)* ID.ME, INC. , is incorporated under the laws of the State of *(name)* VIRGINIA , and has its principal place of business in the State of *(name)* GEORGIA .
Or is incorporated under the laws of *(foreign nation)* Not Applicable ,
and has its principal place of business in *(name)* Not Applicable .

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy–the amount the plaintiff claims the defendant owes or the amount at stake–is more than $75,000, not counting interest and costs of court, because *(explain)*:
The amount in the controversy cannot be easily estimated. Defendant refuses to provide access to Plaintiff's account on ID.Me's website in order for Plaintiff to receive unemployment benefits causing Plaintiff to live without income. In addition, Plaintiff is experiencing foreclosure, which can be avoided by ID.ME providing access to Plaintiff's account. Plaintiff is unable to use her unemployment benefits to pay her mortgage.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?
The events giving rise to Plaintiff's claim occurred in Atlanta, GA - Fulton County.

B. What date and approximate time did the events giving rise to your claim(s) occur?

Plaintiff signed up for an ID.me account on 04/22/2022 at Georgia DOL to receive unemployment benefits. Plaintiff was unable to create an ID.Me account and contacted ID.Me customer support on May 16th, 2022. Plaintiff received an email from ID.Me stating that "A Member Support Representative will be reaching out as soon as possible with assistance. For your records, your ticket number is 10770653." Plaintiff received additional emails from Shamora (Member Support Associate) on May 17th, 2022 and nothing since then despite several emails from Plaintiff. Plaintiff received an email from John (Member Support Associate) on May 27th, 2022 and shortly thereafter, had a video conference call with John to validate Plaintiff's identity. Plaintiff is still not able to access her account on ID.Me in order to receive unemployment benefits

C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

Plaintiff signed up for an ID.me account on 04/22/2022 at Georgia DOL to receive unemployment benefits.
Plaintiff was unable to create an ID.Me account and contacted ID.Me customer support on May 16th, 2022. Plaintiff received an email from ID.Me stating that "A Member Support Representative will be reaching out as soon as possible with assistance. For your records, your ticket number is 10770653."
Plaintiff received additional emails from Shamora (Member Support Associate) on May 17th, 2022 and nothing since then despite several emails from Plaintiff.
Plaintiff received an email from John (Member Support Associate) on May 27th, 2022 and shortly thereafter, had a video conference call with John to validate Plaintiff's identity.
Plaintiff is still not able to access her account on ID.Me in order to receive unemployment benefits.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Preventing Plaintiff's access to unemployment benefits will cause "irreparable harm" because Plaintiff will not be able to pay for housing or food. In addition, Plaintiff left BDO USA, her former employment, because of retaliation after notifying her supervisor, the SEC, and the PCAOB of unethical behaviors that are in violation of SEC regulations and PCAOB standards exhibited by Wesley Freeman, Scott Meier, Peter Poppo, Paul Davidson, Mark Davenport, and Johnson Wong at the following public companies and their affiliates: Interface, Atlanticus, BioHorizons (Henry Schein's subsidiary), Otelco, BlueLinx, NMS SPAR (subsidiary of SPAR). Since Plaintiff filed a complaint with the SEC and the PCAOB, her home has been broken into. Her phones and computers have been hacked. (Case No. 2022CV365268) Also, Plaintiff has been unable to access the limited amount of money she had invested on the Gemini platform. Furthermore, the economy has not yet fully recovered and Plaintiff is dealing with a complex set of issues such as non-existent income due to being blacklisted in the industry and ongoing concerns about the pandemic.
A loss of housing or medical care and the inability to provide food, shelter and adequate childcare for a family constitute irreparable harm pending resolution of this cause of action and are not adequately compensable by an award of damages.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

WHEREFORE, Plaintiff respectfully requests this Court that Defendant be cited to appear and answer herein; that, on final hearing, the Court enters judgment against Defendant in Plaintiff's favor and grants relief to Plaintiff against the Defendant as follows:
1. Declare that the Defendant violated the law as set forth above;
2. Order Defendant, ID.Me, Inc, to give Plaintiff access to her account in order for Plaintiff to claim her unemployment benefits as stipulated under 2 U.S.C. § 1104 Unemployment Trust Fund, 26 U.S.C. 3301 et seq. Federal Unemployment Tax Act, and O.C.G.A. § 34-8-45 Supplemental unemployment benefits;
3. Award the Plaintiff reasonable attorneys' fees and costs and/or pro se fees and costs for her investigation and prosecution of this action; and
4. Grant any such additional relief to Plaintiff in law or equity as the Court deems just and proper under the circumstances.

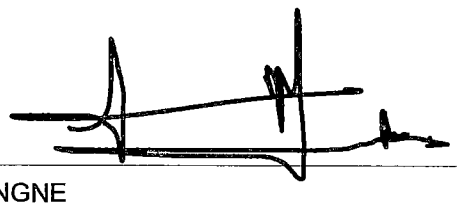
VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case–related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 06/03/2022



Signature of Plaintiff _____

Printed Name of Plaintiff RAISSA DJUISSI KENGNE

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____