

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

MAUREEN HAINS,)
)
 Plaintiff,)
)
 v.)
)
 DAWN M. ADAMS,)
)
 Defendant.)
 _____)

Civil Action No.: **3:19-cv-00504-MHL**

COMPLAINT

Plaintiff, Maureen Hains (“Hains” or “Plaintiff”), by counsel, respectfully states the following for her Complaint against the defendant, Dawn M. Adams (“Adams” or “Defendant”):

INTRODUCTION

1. Ms. Hains brings causes of action under the Stored Communications Protection Act, 18 U.S.C. §§ 2701 *et seq.*, the Computer Fraud and Abuse Act, 18 U.S.C. §§ 1030 *et seq.*, the Virginia Computer Crimes Act, Virginia Code §§ 18.2-152.1 *et seq.*, and a Virginia common law claim for unjust enrichment.

PARTIES

2. Plaintiff Hains is a natural person and adult citizen of the Commonwealth of Virginia and she resides within the Richmond Division of the Eastern District of Virginia.

3. Defendant Adams is a natural person and adult citizen of the Commonwealth of Virginia and she resides in the City of Richmond.

JURISDICTION AND VENUE

4. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331 because it includes causes of action arising under laws of the United States.

5. This Court has supplemental jurisdiction over the Virginia statutory and common law claims pursuant to 28 U.S.C. § 1367.

6. This Court has personal jurisdiction over Defendant because she resides and conducts substantial business in this district, the claims relate to her actions in this district, and she otherwise has sufficient minimum contacts with this forum.

7. Venue for this action properly lies in this Court pursuant to 28 U.S.C. § 1391(b) because, among other things, Defendant resides in the City of Richmond, which is among the territories assigned to the Richmond Division of the Eastern District of Virginia. *See* Local Rule 3 of the U.S. District Court Rules (E.D. VA).

FACTUAL BACKGROUND

A. Hains’ work for Adams as a campaign manager, communications director, legislative assistant, and unpaid medical coder.

8. Adams is a nurse practitioner who served until September 2018 as the Director of the Office of Integrated Health (“OIH”), which is a division of the Virginia Department of Behavioral Health and Developmental Services. She is a Delegate in the Virginia House of Delegates who was first elected in November 2017 to represent the state’s 68th House of Delegates District. Since June 2018, she has also served as owner and CEO of Integrated Health Consulting, LLC (“IHC”), a Virginia limited liability company.

9. Hains worked as Campaign Manager and Communications Director for Adams’ election campaign for Delegate beginning in 2017.

10. Once elected, Adams hired Hains to be her Legislative Assistant and Hains began working for Adams in this capacity in January 2018.

11. After the election, the Republican Party of Virginia accused Adams of “unethical double-dipping” by serving simultaneously as a Delegate and the Director of the Office of

Integrated Health and called on Adams to either resign her position with OIH or her seat in the House of Delegates.

12. In mid-2018, Adams formed IHC and started moonlighting at rehabilitation facilities in the Richmond metropolitan area operated by Laurel Health Care Company (“Laurel”).

13. As part of her work with Laurel, Adams reviewed patient charts and classified and coded the diagnoses, symptoms, and procedures in accordance with International Classification of Diseases, Tenth Revision (ICD-10).

14. From about July 2018 to December 2018, Adams worked for Laurel. During this time period, Adams asked Hains to provide assistance with the ICD-10 medical coding which was part of the work Adams was doing for Laurel. At Defendant’s request, Hains also assisted with medical liability and workers’ compensation insurance for Adams’ business.

15. Adams and Hains corresponded with one another concerning the ICD-10 coding work by email.

16. In working with Hains on the ICD-10 coding, Adams most often used her IHC email account, dawnmadamsihc@gmail.com, or her personal email account, dawnmadams@gmail.com.

17. For the ICD-10 coding work, Hains used her personal Google accounts, including her personal Gmail email account and her Google Drive cloud storage account which was connected to her Gmail account.

18. Toward the end of 2018, Hains was working full time as Adams’ Legislative Assistant, performing a substantial amount of ICD-10 medical coding for Adams for no pay, and serving, also for no pay, as the *de facto* manager and communications director of Adams’ reelection campaign until a campaign manager could be hired.

B. Hains' health crisis and hospitalization.

19. In April 2019, Hains suffered a health crisis for which she was admitted to a health care facility on the morning of April 22, 2019. She remained hospitalized until April 29, 2019, during which time she had no access to electronic devices, including her computer and cell phone. Before she was admitted, Hains deleted the Facebook and Facebook Messenger apps from her phone.

20. On April 22, 2019, Adams was advised of Hains' hospitalization and Adams immediately started pressuring Hains to inform her of Hains' intentions with regard to her jobs. Adams also pressured Hains to apply for short term disability or quit her jobs and gave her an ultimatum deadline of May 1, 2019.

C. Defendant's hacking and unauthorized access to Hains' email, cloud storage, and other online accounts.

21. On April 26, 2019, while Hains was hospitalized, Adams requested that Hains' girlfriend provide Adams with Hains' Facebook authorization code purportedly so Adams could remove Hains as an administrator for the Delegate Adams Facebook page.

22. It was not necessary for Adams to have Hains' Facebook login credentials in order to remove Hains as an administrator of the Delegate Adams Facebook page, so apparently Adams had an ulterior motive for obtaining Hains' login credentials.

23. On April 29, 2019, Hains was discharged and returned to her home. Soon thereafter, she opened her personal Gmail account.

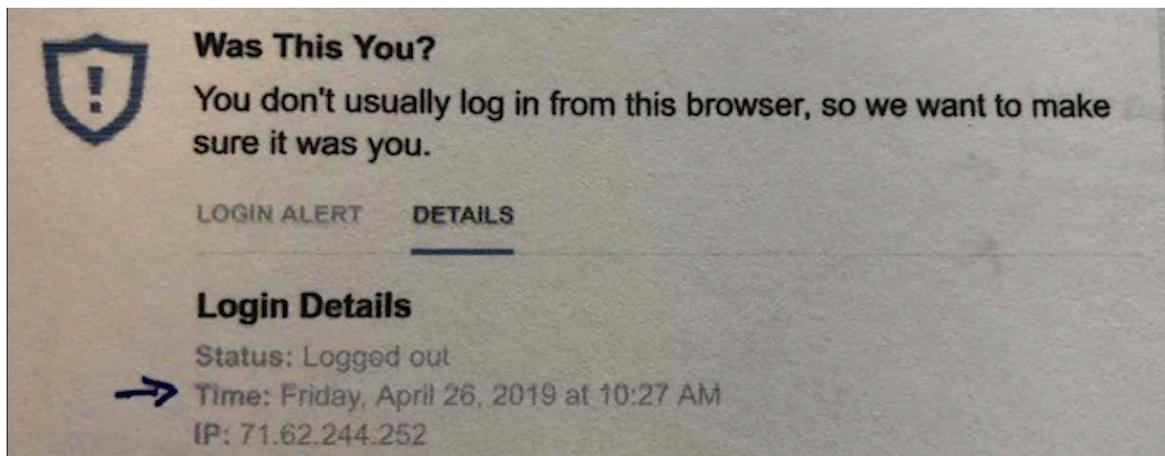
24. When she did so, Hains saw an email from Facebook dated April 26, 2019 at 10:27 AM with the subject "Login alert for Safari on Mac OS X". The email advised her of "an unusual login from a device or location you don't usually use." The email described a new login on April 26, 2019 at 10:27 AM from "Near Richmond, VA, United States" using "Safari on Mac OS X".

25. The alert from Facebook indicated there was a login to Hains' account using the Safari browser on an Apple computer using the Mac Operating System. Neither Hains nor anyone with her Facebook login credentials had an Apple computer, MacBook, or another device running Safari on Mac OS X.

26. However, Adams did own an Apple MacBook and, upon information and belief, she had it on April 26, 2019.

27. Once logged into her Facebook account, Hains was able to review the details of the unusual login on April 26, 2019 at 10:27 AM. The login was from IP Address: 71.62.244.252.

28. The details of the login alert from Facebook for the foregoing login showed the following:



29. The following account activity in Hains' Facebook account confirmed the same login details and IP address:

Web Session Terminated	
Time	Apr 26, 2019, 10:39 AM
IP Address	71.62.244.252
Browser	Mozilla/5.0 (Macintosh; Intel Mac OS X 10_12_6) AppleWebKit/605.1.15 (KHTML, like Gecko) Version/12.1 Safari/605.1.15
Cookie	fRDD*****

Login	
Time	Apr 26, 2019, 10:27 AM
IP Address	71.62.244.252
Browser	Mozilla/5.0 (Macintosh; Intel Mac OS X 10_12_6) AppleWebKit/605.1.15 (KHTML, like Gecko) Version/12.1 Safari/605.1.15
Cookie	fRDD*****

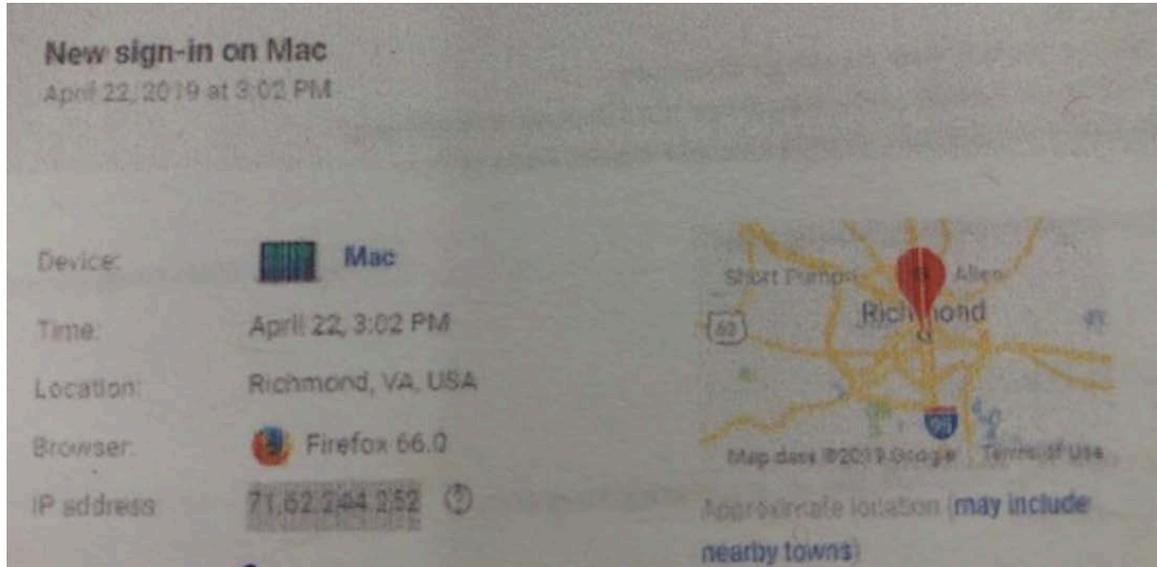
30. The unusual login and activity in her Facebook account was very concerning to Hains, especially since, at the time, she used the same user name and password for other accounts, including her Gmail email account, Google Drive, and Wells Fargo online banking account.

31. As part of her work for Adams, Hains created the Delegate Adams website, www.delegateadams.com, through Wix.com. For the website, Hains also used the same password that she used for her Facebook, Google, and Wells Fargo accounts. Adams had a document with the Delegate Adams website password and she knew, or had access to, the password.

32. In her Gmail account, Hains also received an email from Google on April 22, 2019 at 3:02 PM with the subject "Security alert". The email advised that her Google Account was signed into from a new Mac device.

33. Once signed into her Google account, Hains was able to review recent security events and she discovered that the April 22, 2019 3:02 PM sign in was also from a Mac in Richmond, Virginia with IP Address: 71.62.244.252.

34. Hains' Google account showed the following information about the foregoing login:



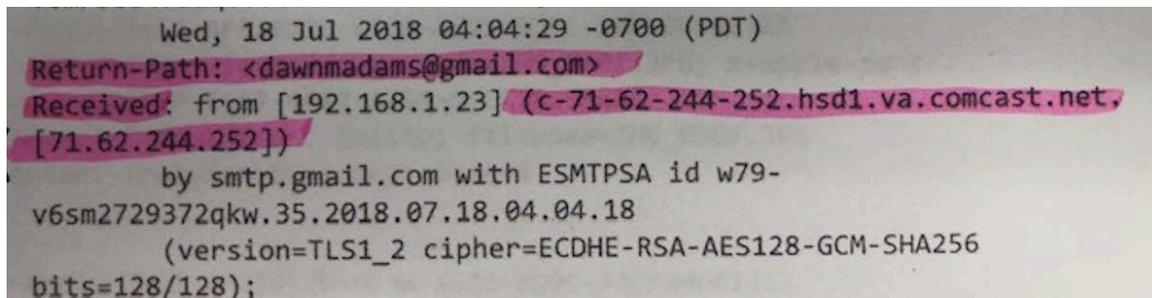
35. These sign-ins to Hains' Facebook and Gmail accounts were both from the same IP Address: 71.62.244.252. They occurred while Hains was hospitalized and without access to her electronic devices and during a time period in which she did not attempt to access her accounts.

36. As her Facebook account appeared to be compromised, Hains changed her Gmail password and her passwords for other online accounts, including Wells Fargo.

37. Over the next few days, Hains reviewed her accounts in an effort to determine the extent of the damage done while her accounts were compromised. She also tried to determine who would have accessed her Facebook and Gmail accounts from IP Address: 71.62.244.252 without her authorization.

38. Suspecting that Adams was responsible, Hains reviewed the source code of other emails that Adams sent to her from dawnmadams@gmail.com and discovered that IP Address: 71.62.244.252 belonged to Adams.

39. For example, the source code for a July 18, 2018 email from Adams to Hains provides the following in pertinent part:



```
Wed, 18 Jul 2018 04:04:29 -0700 (PDT)
Return-Path: <dawnmadams@gmail.com>
Received: from [192.168.1.23] (c-71-62-244-252.hsd1.va.comcast.net,
[71.62.244.252])
    by smtp.gmail.com with ESMTPSA id w79-
v6sm2729372qkw.35.2018.07.18.04.04.18
    (version=TLS1_2 cipher=ECDHE-RSA-AES128-GCM-SHA256
    bits=128/128);
```

40. Based upon the foregoing information, Adams accessed Hains' Facebook and Gmail accounts while Hains was hospitalized.

41. Hains then discovered that almost all of the emails in her Gmail account about the ICD-10 coding work for Adams were gone. She previously had a folder in her Google Drive account named "Integrated Health Care" which contained all the ICD-10 coding work she did for Adams and IHC such as spreadsheets and billing sheets. However, at this time, Hains discovered that the entire folder was gone.

42. Within her Google Drive account, Hains was able to review the past activity which revealed the following:

- a. On April 22, 2019 at 3:02 PM, a search for dawnmadamsihc@gmail.com;
- b. On April 22, 2019 at 3:03 PM, a search for "got print";
- c. On April 23, 2019 at 1:57 PM, a visit to Sign in to the Admin console - G Suite Admin Help;
- d. On April 25, 2019 at 5:21 PM, a search for "ihc";

e. On April 25, 2019 at 5:20 PM, 31 items were moved to the trash in Hains' Google Drive which were billing sheets for Adams and IHC's work for Laurel at Laurels of Bon Air and Laurels of Willow Creek;

f. On April 25, 2019 at 5:29 PM, the folder named "Integrated Health Care" was permanently deleted;

g. On April 26, 2019 at 4:12 PM, two additional documents were moved to the trash in Hains' Google Drive, including a spreadsheet named "Campaign donor mail 5.xlt" and a logo that Hains created in 2015 which was not related to her work for Adams; and

h. At some point, these items in the trash folder were permanently deleted.

43. Based upon the foregoing information, Adams accessed Hains' Google Drive account and took the foregoing actions, including the deletion of Hains' files, while Hains was hospitalized.

44. Around this time, having discovered what Adams had done, Hains realized that she could no longer trust Adams. She began consulting with an attorney (not the undersigned) about the matter and the possibility of an amicable separation of her employment with Adams. Hains sent and received emails from her attorney using her personal Gmail account, believing it was secure after the password was changed.

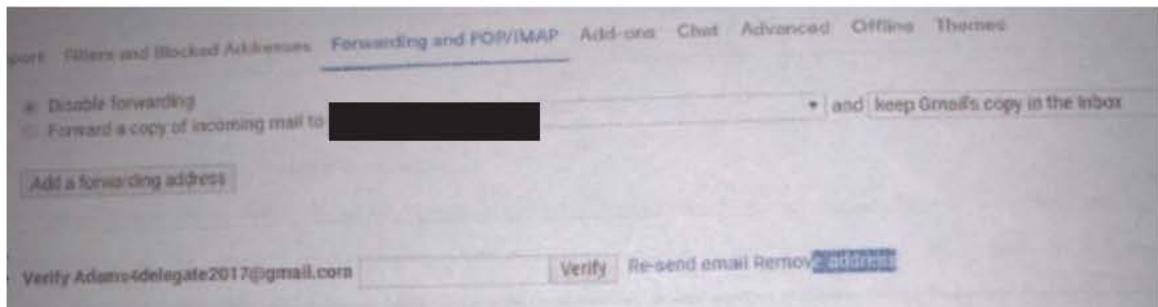
45. On May 3, 2019 at 4:56 AM, Hains received an email with the subject "Your Wells Fargo Online access has been suspended". The email advised that the suspension was because Wells Fargo "detected a possible unauthorized attempt to sign on to [her] account."

46. Based upon the fact that Adams had the password to Hains' bank account (which was the same as her other passwords) and the temporal proximity to Adams' hacking of Hains'

other accounts, Adams was the person who attempted to gain unauthorized online access to Hains' Wells Fargo account.

47. On May 6, 2019, Hains was preparing to email a document to her attorney and she decided to check her Gmail account settings.

48. Within the Gmail settings for Forwarding and POP/IMAP, it showed the following which indicated that someone tried to add Adams4delegate2017@gmail.com as a forwarding address and the Adams4delegate2017@gmail.com email address was pending verification to enable the forwarding:



49. Further, Hains' Gmail settings appeared to show that maureen@delegateadams.com, Plaintiff's previous work account, had been set up as a forwarding email account, meaning all of the emails to Hains' personal Gmail account would be forwarded to maureen@delegateadams.com.

50. While Hains was hospitalized, Adams removed Hains' authorization for the maureen@delegateadams.com email account and Hains could no longer sign in to the account.

51. Based upon the foregoing facts, Adams was the person who attempted to forward all of Hains' incoming personal Gmail emails to Adams4delegate2017@gmail.com and attempted to forward, or did forward, such emails to maureen@delegateadams.com.

52. Upon information and belief, Adams' took the foregoing actions, including accessing Hains' accounts and deleting files either (i) to cover up for her actual or perceived

violation of laws concerning the privacy and disclosure of medical information which are implicated by Adams having Hains do medical coding work for her (*e.g.*, Health Insurance Portability and Accountability Act of 1996); (ii) to hide the fact that she was overworking Hains in the months prior to her health crisis; (iii) to avoid paying Hains for such work; and/or (iv) to destroy information that could lead to more criticism from Adams' political opponents.

D. A summary of Plaintiff's damages and the basis for Defendant's liability.

53. As a direct and proximate result of the foregoing acts and/or omissions of Defendant, Hains' privacy has been violated, her personal communications, documents, and files have been accessed, and in some cases deleted, without her authorization or consent, she has suffered severe mental anguish and/or emotional distress for which she has required medical treatment, certain prior medical conditions have been exacerbated, and she was not paid for work performed at the direction of and for the benefit of Adams. Plaintiff's damages and injuries include, but are not limited to, statutory and compensatory damages, unpaid wages, medical expenses incurred and reasonably expected to be incurred, anxiety, loss of enjoyment of life, helplessness, inconvenience, and stress, for which damages Adams is liable.

54. Due to the acts and/or omissions of Defendant, Hains has been forced to expend an estimated 65-80 hours investigating the unauthorized access to her accounts and attempting to secure the accounts that were compromised, including discussions with legal counsel and law enforcement officers.

55. The actions and conduct of Adams as set forth herein were intentional, reckless, willful, wanton and/or vindictive and they were outrageous and/or intolerable by any reasonable person such that Hains is entitled to an award of punitive damages.

CAUSES OF ACTION

COUNT I:
VIOLATIONS OF STORED COMMUNICATION ACT
(18 U.S.C. §§ 2701, *et seq.*)

56. Plaintiff incorporates by reference and re-alleges each allegation set forth above.

57. The Stored Communications Act (“SCA”) set forth the punishment for whomever “(1) intentionally accesses without authorization a facility through which an electronic communication service is provided; or (2) intentionally exceeds an authorization to access that facility; and thereby obtains, alters, or prevents authorized access to a wire or electronic communication while it is in electronic storage in such system...” 18 U.S.C. § 2701(a).

58. Pursuant to 18 U.S.C. § 2707, a private cause of action exists for persons injured by a violation of the SCA.

59. The Fourth Circuit has previously held that unauthorized access of previously opened and delivered emails fall within the scope of § 2701. *Hately v. Watts*, 917 F.3d 770 (4th Cir. 2019).

60. Adams, without authorization, knowingly and intentionally accessed electronically stored emails, including delivered and opened emails, from Hains’ Gmail account regarding the ICD-10 coding work. Adams altered the emails by deleting them, thus preventing Hains’ future access to these electronic communications in violation of the SCA.

61. Hains has incurred actual damages by Adams’ unauthorized access in responding to Adams’ actions. Adams made profits from the ICD-10 coding work which was the subject of the emails and/or files she deleted without authorization from Hains’ accounts.

62. In addition, Hains has suffered severe mental anguish and/or emotional distress for which she has required medical treatment and therapy, and certain prior medical conditions have been exacerbated.

63. Hains is entitled to statutory damages pursuant to 18 U.S.C. § 2707(c) in the amount of Plaintiff's damages and Defendant's profits. As alleged above, Hains has suffered injuries and incurred damages as a result of Defendant's actions and conduct.

64. Pursuant to 18 U.S.C. § 2707(b)(3), Plaintiff is also entitled to her reasonable attorney's fees and other litigation costs reasonably incurred herein.

COUNT II:
VIOLATIONS OF COMPUTER FRAUD AND ABUSE ACT
(18 U.S.C. § 1030, *et seq.*)

65. Plaintiff incorporates by reference and re-alleges each allegation set forth above.

66. Pursuant to the Computer Fraud and Abuse Act ("CFAA"), the intentional access of a computer without authorization, or in excess of authorized access, to obtain information from any protected computer is prohibited. 18 U.S.C. § 1030(a)(2)(C)

67. Pursuant to 18 U.S.C. § 1030(a)(5)(B) and (C), it is also prohibited to intentionally access a protected computer without authorization and recklessly cause damage and loss.

68. The computers storing the data associated with Mr. Hains' Facebook and Google accounts are "protected computers" because they are used in or affecting interstate commerce or communications. 18 U.S.C. § 1030(e)(2).

69. A private right of action exists for any person who suffers damage or loss by reason of a violation of the CFAA, provided that one of several enumerated factors are present. 18 U.S.C. § 1030(g).

70. Among the enumerated factors for civil recovery are: (1) “loss to 1 or more persons during any 1-year period . . . aggregating at least \$5,000 in value;” and (2) “the modification or impairment, or potential modification or impairment, of the medical examination, diagnosis, treatment, or care of 1 or more individuals[.]” 18 U.S.C. § 1030(c)(4)(A)(i)(I)-(II).

71. “Loss” is defined by the CFAA as “any reasonable cost to any victim, including the cost of responding to an offense, conducting a damage assessment, and restoring . . . the system . . . to its condition prior to the offense, and any revenue lost, cost incurred, or other consequential damages incurred because of interruption of service.” 18 U.S.C. § 1030(e)(11).

72. Adams did not have authorization to access Hains’ Facebook, Google, or Wells Fargo online accounts. In accessing, or attempting to access, the accounts, Adams obtained information from Hains, including information contained in Hains’ Gmail and Google Drive accounts regarding the ICD-10 coding work that Hains’ did for Adams.

73. Two of the foregoing factors are present in this case as Hains suffered at least \$5,000 in aggregate losses during a 1-year period and an actual or potential modification or impairment of her medical diagnosis, treatment, and care, including counseling and therapy required as a result of Adams’ actions. As such, Hains is qualified to bring a private cause of action under the CFAA.

74. Hains incurred substantial losses in responding to Adams’ offenses and other consequential damages. The broadly worded definition of “loss” “plainly contemplates . . . costs incurred as part of the response to a [Computer Fraud and Abuse Act] violation, including the investigation of an offense.” *A.V. ex rel Vanderhye v. iParadigms, LLC*, 562 F.3d 630, 646 (4th Cir. 2009).

75. Due to the acts and/or omissions of Defendant, Hains has incurred losses and damages, as set forth herein for which Defendant is liable under the CFAA.

COUNT III:
COMPUTER FRAUD UNDER THE VIRGINIA COMPUTER CRIMES ACT
(Virginia Code §§ 18.2-152.1, *et seq.*)

76. Plaintiff incorporates by reference and re-alleges each allegation set forth above.

77. Pursuant to Virginia Computer Crimes Act (“VCCA”), Va. Code § 18.2-152.1 *et seq.*, any person whose property or person is injured by a provision of the Act “may sue therefor and recover for any damages sustained and the costs of suit.” Va. Code § 18.2-152.12(A).

78. Pursuant to Va. Code § 18.2-152.3, “[a]ny person who uses a computer or computer network, without authority and obtains property or services by false pretenses . . . [or] converts the property of another is guilty of the crime of computer fraud.”

79. Adams did not have authority to access Hains’ Gmail or Google Drive accounts.

80. Adams used Hains’ password without authorization to access Hains’ Gmail and Google Drive accounts by false pretenses, to obtain Hains’ property, including email and files, and delete some of emails and files, in violation of the VCCA.

81. Adams used Hains’ password to access Hains’ Gmail account and attempted to forward all of Hains’ personal Gmail emails to Adams4delegate2017@gmail.com and did forward said emails to maureen@delegateadams.com.

82. By taking these actions, Adams obtained Hains’ property by false pretenses, committed larceny with regard to files and emails she accessed, deleted, or forwarded to herself, and converted Hains’ property, in violation of the VCCA. Va. Code § 18.2-152.3

83. Hains has incurred substantial damages and costs, as alleged herein, related to investigating and responding to Adams' offenses, severe mental anguish and/or emotional distress, an exacerbation of prior medical conditions, and other consequential damages.

84. Evidence of consequential damages come within the "any damages" language of the Virginia Computer Crimes Act. *A.V. ex rel Vanderhye*, 562 F.3d 630, 647.

85. Pursuant to Va. Code § 18.2-152.3, Plaintiff is also entitled to recover the costs of this suit.

COUNT IV:

**COMPUTER TRESPASS UNDER THE VIRGINIA COMPUTER CRIMES ACT
(Virginia Code §§ 18.2-152.1, *et seq.*)**

86. Plaintiff incorporates by reference and re-alleges each allegation set forth above.

87. Pursuant to Va. Code § 18.2-152.4, it is unlawful to "remove [] or otherwise disable any computer data . . . from a computer or computer network." It is also unlawful for a person to use a computer to "make . . . an unauthorized copy, in any form, . . . of computer data."

88. Adams unlawfully deleted emails and files from Hains' Gmail and Google Drive accounts.

89. Adams unlawfully made unauthorized copies of Hains' personal emails when Adams altered Hains' email settings to have Hains' emails forwarded to Adams4delegate2017@gmail.com and/or maureen@delegateadams.com.

90. As alleged above, Hains has suffered injuries and incurred damages as a result of Defendant's actions and conduct for which Defendant is liable. Pursuant to Va. Code § 18.2-152.3, Plaintiff is also entitled to recover the costs of this suit.

COUNT V:

**INVASION OF PRIVACY UNDER THE VIRGINIA COMPUTER CRIMES ACT
(Virginia Code §§ 18.2-152.1, *et seq.*)**

91. Plaintiff incorporates by reference and re-alleges each allegation set forth above.

92. Pursuant to Va. Code § 18.2-152.5, it is unlawful to use a computer or computer network, without authorization, to intentionally examine “any employment, salary, credit or any other financial or identifying information . . . relating to any another person.”

93. Adams did not have authorization to access Hains’ Gmail, Google Drive, and Facebook accounts.

94. Hains’ Gmail and Google Drive account contained financial information, including information about Hains’ debts, how Hains is working to pay the debt down, and income, and also username and password information regarding various accounts. Her Google and Facebook accounts also contained employment and other identifying information relating to Hains.

95. As alleged above, Hains has suffered injuries and incurred damages as a result of Defendant’s actions and conduct for which Defendant is liable. Pursuant to Va. Code § 18.2-152.3, Plaintiff is also entitled to recover the costs of this suit.

COUNT VI:
QUASI CONTRACT / UNJUST ENRICHMENT
(pursuant to Virginia common law)

96. Plaintiff incorporates by reference and re-alleges each allegation set forth above.

97. Under Virginia law, to recover unjust enrichment damages, a plaintiff must show that: (1) she provided a benefit to the defendant; (2) with a reasonable expectation of payment; (3) the defendant knew or should have known of the benefit provided and the expectation of payment; and (4) allowing the defendant to retain the benefit without paying for its value would be inequitable.

98. Hains provided a benefit to Adams in performing a substantial amount of ICD-10 medical coding for Adams without payment.

99. Hains also performed substantial services for Adams' campaign for Delegate as Campaign Manager and Communications Director without compensation. For 2017, Hains was paid a total of \$7,000 for this work which was far less than the reasonable and customary pay for these positions. Hains received no compensation for this work in 2018 and 2019, except for a holiday bonus of \$2,600 in January 2019. The value of the unpaid services performed for Adams' campaign is estimated to be \$52,000 or more.

100. At Defendant's request, Hains also paid to store a large number of yard signs from Adams' campaign for Delegate for over one year and paid for materials and supplies for the campaign for which she was not reimbursed.

101. Hains also furnished office supplies and equipment for Adams' benefit, some of which may still be in Adams' office.

102. Defendant also asked Hains to handle certain personal matters for her such as attempting to get out of parking tickets issued to Adams and requesting a refund from the Washington Post due to a misspelling in Adams' father's obituary.

103. Hains had a reasonable expectation of payment for the foregoing services and materials, as it far exceeded the scope of her work as Adams' Legislative Assistant.

104. Adams knew of the benefits that Hains provided by performing the foregoing work and furnishing certain materials and services for Adams' campaign and her separate business (IHC) and for Adams personally. Adams knew, or should have known, of Hains' reasonable expectation of payment.

105. Allowing Adams to retain the benefit of the foregoing work performed and materials furnished by Hains' without paying for their value would be inequitable.

106. As such, Hains is entitled to recover from Adams a sum equal to the reasonable value of the work and materials provided by Hains to Adams, her campaign, and IHC.

RELIEF REQUESTED

WHEREFORE, Plaintiff, Maureen Hains, respectfully requests that this Court:

- A. Enter judgment in her favor and against Defendant, Dawn M. Adams (All Counts);
- B. Declare the acts of Defendant, as described herein, to be unlawful (Count I);
- C. Award Plaintiff compensatory damages for Defendant's violation of Plaintiff's statutory and/or common law rights, in the amount of ONE HUNDRED THOUSAND (\$100,000.00), or such greater amount as may be shown (Counts I, II, III, IV, and V);
- D. Award Plaintiff compensatory damages for Defendant's unjust enrichment at Plaintiff's expense in the amount of ONE HUNDRED THOUSAND (\$100,000.00), or such greater amount as may be shown (Count VI);
- E. Award Plaintiff punitive damages against Defendant in the amount of THREE HUNDRED AND FIFTY THOUSAND (\$350,000.00) (Count I);
- F. Award Plaintiff her reasonable attorneys' fees and litigation costs expended herein pursuant to 18 U.S.C. § 2707(b)(3) and/or Virginia Code § 18.2-152.12(A) (Counts I, III, IV, and V);
- G. Award Plaintiff pre- and post-judgment interest on any monetary award; and
- H. Award Plaintiff any and all other and further relief the Court deems just and appropriate, including leave to amend the facts stated herein, add parties and/or claims, and amend the damages sought as further evidence is obtained through discovery in this matter.

PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

Respectfully submitted,
MAUREEN HAINS
Plaintiff

Dated: July 11, 2019.

By: /s/ Robert J. Allen
Counsel

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