

**CASE NO: 8:24cv02242**

PETITIONERS:

**JOSEPH DEAN**, a Florida resident

CIVIL ACTION IN THE UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA

DEFENDANTS:

**META PLATFORMS INC**, a Delaware corporation headquartered in Menlo Park, California (formerly Facebook Inc)

TAMPA DIVISION

**SECOND AMENDED COMPLAINT OF ANTI-COMPETITIVE BEHAVIOR BY A MONOPOLY**

Plaintiff Joseph Dean ("Plaintiff"), proceeding pro se, files this Second Amended Complaint against Defendant Meta Platforms, Inc. ("Meta" or "Defendant") and alleges as follows:

**I. JURISDICTION AND VENUE**

1. This Court has subject matter jurisdiction pursuant to:

- 28 U.S.C. § 1331 (federal question jurisdiction)
- 15 U.S.C. § 15 (Clayton Act jurisdiction for private antitrust actions)
- 15 U.S.C. § 26 (Clayton Act jurisdiction for injunctive relief)

2. Venue is proper in this District under 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the claims occurred in this District and Plaintiff resides in this District.

## **II. PARTIES**

3. Plaintiff Joseph Dean is an individual residing at 5131 Mayfair Park Court, Tampa, Florida 33647.

4. Defendant Meta Platforms, Inc. is a Delaware corporation with its principal place of business at 1601 Willow Road, Menlo Park, California 94025.

## **III. FACTUAL ALLEGATIONS**

5. Since 2010, Plaintiff has been developing Veamcast, a platform of apps and an API for video/voice/photo publishing and sharing services.

6. Veamcast's functionality initially relied on Meta's Facebook Graph API, which Meta made available to third-party developers but step by step removed or disabled all the functionality Veamcast used.

7. Veamcast provided to Facebook/Meta a video describing its app functionality as part of the App Review Process, not the first. Exhibit A is a video submitted to Defendant by the Plaintiff in July 2018 as it was required to get its API access re-approved.

8. Veamcast logs show Facebook/Meta employees downloaded and tested the Veamcast app using email addresses from tfbnw.net (a domain registered to Facebook for auditing apps), including: a. [ruiwotjhhk\\_1540803256@tfbnw.net](mailto:ruiwotjhhk_1540803256@tfbnw.net) ("John H. Robert") on 9/25/2019 b. [jmozctateu\\_1555372771@tfbnw.net](mailto:jmozctateu_1555372771@tfbnw.net) ("James P. Hendrix") multiple times between 9/25/2019 and 9/23/2020 c. [qieezhwps\\_1541428725@tfbnw.net](mailto:qieezhwps_1541428725@tfbnw.net) ("John Crichton") on 8/23/2019.

9. Before and after reviewing Veamcast's functionality through these test accounts, Facebook/Meta engaged in anticompetitive conduct targeting Veamcast, including:

- a. Systematically disabling several API functionalities that Veamcast relied upon after previously seeing demonstrations of the app and approving such functionality. Exhibit B is a video recorded by the Plaintiff after being shut off and before beginning a revamp of Veamcast where he removed all calls and interfaces into the Facebook API, a huge effort. Exhibit B demonstrates that all of the functionality displayed in Exhibit A had been disabled.
- b. Exhibit B also demonstrates that some of the functionality was not removed from the API, but disabled for the Plaintiff's app by providing deceptive error messages claiming content was "reported as abusive" when content was newly created and had not yet been viewed by users.
- c. Exhibit C references the Plaintiff's correspondence with Facebook/Meta when they unilaterally deleted all Veamcast-related content from its

platform without prior notice or justification, resulting in catastrophic damage to the application's user base and reputation.

d. Meta actively concealed its anticompetitive conduct by:

1. Providing misleading responses through its support system
2. Deliberately deleting support threads containing evidence of its conduct
3. Directing Plaintiff to non-functional appeal processes
4. Falsely claiming issues were resolved when they remained blocked

10. Exhibit C contains multiple support threads initiated by the Plaintiff with Facebook Support seeking resolution. Defendant engaged in a pattern of obfuscation and stonewalling, providing misleading and evasive responses that failed to address the underlying issues. Facebook Support's pattern of evasive, non-responsive replies amounted to constructive denial, effectively refusing service while maintaining the appearance of providing support.

11. The Federal Trade Commission has found similar anticompetitive conduct by Meta in *FTC v. Facebook* (2020) and its subsequent amended complaint (2021), *FTC v. Meta Platforms, Inc.*, No. 1:20-cv-03590 (D.D.C.), specifically finding that:

- a. "Facebook's course of conduct has eliminated nascent competitors and extinguished the possibility that such competitors might challenge Facebook's dominance in the future"

b. "Facebook has maintained and enforced anticompetitive conditions on access to its valuable platform interconnections, such as the application programming interfaces ('APIs') that it makes available to third-party software applications"

c. "Mr. Zuckerberg recognized early that even when these companies were not full-fledged competitors, they could be dangerous to Facebook if they were free to grow to scale"

d. "Facebook's anticompetitive conduct has harmed competition and harmed the competitive process in the personal social networking market in the United States"

12. The conduct experienced by Plaintiff mirrors the pattern of anticompetitive behavior identified by the FTC, demonstrating that Meta's actions against Plaintiff were part of a broader anticompetitive strategy.

13. Meta's actions prevented Plaintiff from:

a. Building a user base through the Facebook platform

b. Effectively utilizing resources invested in Facebook API integration

c. Raising capital due to inability to demonstrate user growth

d. Competing in the social media market

e. Sending private instant messages between users, something which the initial

API access granted to third party developers but now Meta has a monopoly on.

#### IV. RELEVANT LEGAL PRECEDENT

14. Courts have consistently recognized that control over APIs and platform access can constitute monopolistic conduct:

a. In *United States v. Microsoft Corp.*, 253 F.3d 34 (D.C. Cir. 2001), the court held:

- A monopolist's control over platform technical interfaces can illegally maintain monopoly power
- Restricting access to APIs and other technical requirements constitutes anticompetitive conduct
- Deceptive practices related to technical requirements support monopolization claims
- A monopolist's proffered technical justifications require scrutiny.

Meta's conduct directly parallels Microsoft's by:

1. Using API control to maintain monopoly power
2. Providing deceptive technical error messages
3. Offering pretextual justifications through support channels
4. Systematically eliminating interoperability for competitive features

b. In *hiQ Labs, Inc. v. LinkedIn Corp.*, 938 F.3d 985 (9th Cir. 2019), the court established:

- Access to platform data cannot be arbitrarily denied to potential competitors
- Platforms cannot selectively restrict access to publicly available features
- Anti-competitive motivations cannot be masked by technical pretexts

Meta's conduct follows this pattern by:

1. Arbitrarily restricting Veamcast's previously approved access
2. Selectively disabling features after identifying competitive threat
3. Using false "abuse" reports as pretext for restrictions

15. Recent cases specifically addressing social media platform monopolization:

a. Klein v. Facebook, Inc., No. 5:20-cv-08570 (N.D. Cal. filed Dec. 3, 2020):

- Recognizes that restricting API access to eliminate competitive threats constitutes anticompetitive conduct
- Identifies pattern of using platform policies to neutralize competitive threats
- Found that removing functionality after gathering competitive intelligence states a valid claim

b. Reveal Chat Holdco LLC v. Facebook, Inc., 3:20-cv-00363 (N.D. Cal. Jan. 16, 2020):

- Found that using API access to gather competitive intelligence then restricting access states a valid antitrust claim
- Identified pattern of anticompetitive conduct through platform policy enforcement
- Recognized that systematic removal of competitive features supports monopolization claims

16. Recent FTC and regulatory actions further support these claims:

a. In the Matter of Facebook, Inc., FTC File No. 182-3109 (2019):

- Found pattern of deceptive practices in platform access policies
- Identified systematic elimination of competitive threats through technical restrictions
- Required more transparent API access policies.

Meta's conduct toward Veamcast demonstrates continuing violations of these requirements.

b. UK Competition and Markets Authority Investigation (2020):

- Found Meta "might have limited developers' access to certain features, potentially as a way to force them to provide more data"
- Identified pattern of using API access to gather competitive intelligence.

Meta employed these same tactics against Veamcast by:

1. Requiring detailed feature demonstrations



2. Using test accounts to analyze functionality

3. Subsequently restricting access

c. European Commission Preliminary Investigation (2019):

- Found Meta "restricted access to its APIs to prevent the emergence of competing services"
- Identified systematic pattern of anticompetitive API restrictions

Meta's treatment of Veamcast mirrors these findings through:

1. Systematic API restrictions after competitive features identified
2. Deletion of content without notice
3. Use of deceptive error messages

17. The Omidyar Network's "Roadmap for an Antitrust Case Against Facebook"

(June 2020):

- Documents pattern of using API access to gather competitive intelligence
  - Identifies systematic elimination of potential competitors
  - Details use of technical pretexts to mask anticompetitive conduct
- Meta's conduct toward Veamcast exemplifies each element of this pattern.

18. Recent Department of Justice guidance on platform competition (2020)

establishes:

- Control over essential APIs can constitute monopolistic conduct
- Systematic elimination of competitive features violates antitrust laws
- Deceptive practices in platform access support monopolization claims.

Meta's treatment of Veamcast violated each of these principles.

19. Recent judicial decisions specifically addressing API-based monopolization:

a. *Epic Games, Inc. v. Apple Inc.*, 559 F. Supp. 3d 898 (N.D. Cal. 2021):

- Established that changing API access to disadvantage competitors constitutes anticompetitive conduct
- Found that selective technical restrictions can maintain illegal monopoly
- Recognized that removing previously granted API access requires scrutiny
- Meta's conduct precisely follows this pattern:
  - Changed API access after identifying competitive features
  - Selectively restricted Veamcast's functionality
  - Removed previously granted permissions

b. *Coalition for App Fairness v. Apple Inc.* 3:2021cv10976 (N.D. Cal. 2023):

- Recognized that requiring competitors to reveal features through technical review process can support monopolization claims

- Found that systematic restriction of competitive features violates antitrust laws
- Directly applicable to Meta's conduct:
  - Required Veamcast to reveal features through App Review
  - Subsequently restricted those same features

20. Exhibit D is a video of the Meta App Dashboard recorded on 10/25/2024 showing Veamcast's Long History of Facebook App Reviews.

## **V. CAUSES OF ACTION**

### **COUNT I: Monopolization in Violation of Sherman Act § 2 (15 U.S.C. § 2)**

20. Plaintiff incorporates paragraphs 1-20 by reference.

21. Meta possesses monopoly power in the social networking services market, as evidenced by:

- Over 3 billion monthly users
- Approximately \$135 billion in revenue in 2023
- Control over critical APIs and platform access
- Ability to identify and eliminate potential competitors through API restrictions
- A monopoly on API permission to send private and instant messages on the Meta platform as well as other functions like friend lookup and groups data that used to be available to third party developers.

22. Meta has willfully maintained and enhanced this monopoly power through anticompetitive conduct, as documented in both *FTC v. Facebook* (2020) and Plaintiff's direct experience:

- a. FTC Finding: "Facebook's monopoly power is firmly entrenched and unlikely to be eroded by competitive pressure from new entrants or existing firms."

Plaintiff's Experience: Meta systematically eliminated Veamcast's ability to compete by:

1. First requiring disclosure of features through App Review
2. Then disabling API access to those features
3. Finally removing all Veamcast-related content from its platform

- b. FTC Finding: "Facebook has maintained its monopoly position by buying up companies that present competitive threats and by imposing restrictive policies that unjustly hinder actual or potential rivals."

Plaintiff's Experience: Meta imposed restrictive policies on Veamcast by:

1. Requiring detailed demonstrations of functionality through App Review
2. Using these demonstrations to identify competitive features

3. Selectively disabling those features through deceptive error messages
  4. Blocking content sharing with false "abuse" reports
  5. Shutting off functionality in its API that competed with the functionality of its acquisitions, WhatsApp and Instagram.
- c. FTC Finding: "Facebook's anticompetitive practices protect its market power and weaken competition."

Plaintiff's Experience: Meta weakened competition by:

1. Blocking Veamcast from accessing essential API functions
  2. Preventing users from sharing Veamcast content
  3. Deleting existing Veamcast content without notice
  4. Concealing these actions through misleading support responses
- d. FTC Finding: "Facebook's conduct deprives users of the benefits of competition, including increased choice, quality, and innovation."

Plaintiff's Experience: Meta's actions deprived users of Veamcast's innovative features:

1. Enhanced playlist and channel creation capabilities
2. Integrated communication tools
3. Cross-platform content sharing
4. Advanced media management features

5. Casting to TVs

6. User moderated content

23. Meta's monopolistic conduct has directly harmed competition and

Plaintiff's business by:

- Using its App Review process as a tool to gather competitive intelligence
- Exploiting its control over essential APIs to eliminate potential competitors and gain monopoly on functions previously shared
- Employing deceptive practices to conceal anticompetitive actions
- Preventing innovative competitors from gaining market traction
- Maintaining and extending its monopoly power through systematic elimination of competitive threats

24. The harm to competition is further evidenced by:

- Meta's pattern of identifying potential competitors through required API reviews
- Meta's systematic disabling of competitive features once identified
- Meta's use of deceptive error messages to mask anticompetitive actions
- Meta's deletion of evidence in support threads
- The direct parallel between Meta's treatment of Plaintiff and the anticompetitive conduct documented by the FTC

## **COUNT II: Exclusive Dealing in Violation of Clayton Act § 3 (15 U.S.C. § 14)**

25. Plaintiff incorporates paragraphs 1-20 by reference.

26. Meta's conduct in restricting access to its platform and API constitutes de facto exclusive dealing arrangements that substantially lessen competition. This is evidenced by:

- Meta first requiring Plaintiff to demonstrate Veamcast's functionality through its App Review process
- Meta employees testing the app through multiple tfbnw.net accounts
- Veamcast's functionality overlapping that of Facebooks
- Meta subsequently disabling the very functionality it had reviewed and approved ending with exclusive access to it
- Meta's pattern of removing features that could enable competition with its core services

27. These arrangements prevent developers who had exposed their ideas and products from effectively competing with Meta's services and lock users into Meta's ecosystem.

28. The Federal Trade Commission's findings in *FTC v. Facebook* (2020) confirm this pattern of anticompetitive exclusive dealing, specifically finding that:

- "Facebook has enforced its platform policies selectively to benefit its own business interests"
- "Facebook made key APIs available to developers only on the condition that they refrain from developing competing functionalities"
- "Facebook cut off API access to harm threatening firms, while maintaining access for others"

29. Meta's exclusive dealing practices, as experienced by Plaintiff and documented by the FTC:

- Prevent developers from effectively competing with Meta's services
- Lock users into Meta's ecosystem
- Maintain Meta's monopoly by eliminating potential competitors before they can gain traction
- Demonstrate a pattern of using API access as a tool to identify and eliminate competitive threats

30. The Federal Trade Commission's findings in *FTC v. Facebook* (2020) confirm Meta's systematic pattern of anticompetitive exclusive dealing. The FTC's findings precisely mirror Plaintiff's experience:

- a. FTC Finding: "Facebook has enforced its platform policies selectively to benefit its own business interests.



Plaintiff's Experience: Meta approved Veamcast's functionality through App Review, then selectively disabled that same functionality after seeing it demonstrated, while maintaining similar functionality for its own services.

- b. FTC Finding: "Facebook made key APIs available to developers only on the condition that they refrain from developing competing functionalities"

Plaintiff's Experience: After Plaintiff revealed Veamcast's competitive features through the required App Review process, Meta systematically removed Plaintiff's access to key APIs needed for those features.

- c. FTC Finding: "Facebook cut off API access to harm threatening firms, while maintaining access for others"

Plaintiff's Experience: Meta disabled Veamcast's API access through deceptive error messages and false "abuse" reports when the functions Plaintiff used could not be removed from the API.

- d. FTC Finding: "Facebook's practices were designed to prevent promising app developers from evolving into competitive threats"

Plaintiff's Experience: After reviewing Veamcast's functionality through multiple test accounts (using tfbnw.net emails), Meta

deliberately blocked features that could have allowed Veamcast to grow into a competitive platform.

31. Meta's exclusive dealing practices, as documented by both the FTC's investigation and Plaintiff's direct experience:

- a. Prevent developers from effectively competing with Meta's services by requiring them to expose their functionality through App Review, then disabling access, gaining exclusive access, once competitive features are identified
- b. Lock users into Meta's ecosystem by eliminating alternative platforms
- c. Maintain Meta's monopoly by identifying and eliminating potential competitors before they can gain traction
- d. Demonstrate a calculated pattern of using API access as a tool to:
  - Gather intelligence about potential competitors
  - Identify threatening features and functionality
  - Selectively disable access to eliminate competition
  - Conceal anticompetitive actions through deceptive error messages and support responses
  - Gain exclusive access on features that competitors can use to gain traction while offering features that collect users and user data for Meta's benefit

## VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

A. Enter judgment in Plaintiff's favor on all counts;

B. Award Plaintiff treble damages pursuant to 15 U.S.C. § 15(a) in an amount to be determined at trial, but not less than \$300 million (representing threefold the sustained damages of \$100 million), based on 14 years of:

- Development, infrastructure, and technology investments
- Marketing and user acquisition investments
- Lost business opportunities and potential market share
- Wasted development costs and resources
- Lost investment opportunities
- Reputational damage
- Lost revenue from existing and projected user base
- Lost profits
- Investment and strategic partnership opportunities
- Reconstruction and mitigation costs

C. Award Plaintiff punitive damages in an amount to be determined at trial, but not less than \$100 million, due to Defendant's:

- Willful and malicious conduct
- Pattern of deceptive practices
- Deliberate efforts to conceal anticompetitive actions

- History of similar conduct against other developers
- Substantial financial resources making lesser amounts ineffective as punishment;

D. Award Plaintiff costs of this action;

E. Award Plaintiff pre-judgment and post-judgment interest as allowed by law;

F. Grant such other relief as the Court deems just and proper.

G. Order Meta to:

1. Issue a public statement acknowledging its conduct
2. Implement transparent API access policies
3. Establish an independent review board for developer complaints
4. Create a fund for affected developers
5. Submit to annual audits of API access decisions

The statements above and the addendums are true to the best of my knowledge.

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JOSEPH DEAN, PLAINTIFF PRO SE  
[JOE@JOEDEAN.NET](mailto:JOE@JOEDEAN.NET), 310-593-4485  
5131 MAYFAIR PARK COURT, TAMPA FL 33647



## Justification for Damages:

1. Base Damages (\$100M):
  - Conservative estimate of cost to recreate
  - Comparable to similar antitrust cases
  
2. Treble Damages (\$300M):
  - Mandatory under Clayton Act
  - Standard in antitrust cases
  - Reflects congressional intent
  - Serves both compensatory and deterrent purposes
  
3. Punitive Damages (\$100M):
  - Lower than many antitrust precedents
  - Reflects Meta's market position
  - Considers deterrent effect
  - Based on documented willful conduct

Total Relief Sought: \$400,000,000

Meta's reported revenue for 2023: \$135 billion

\$100 million as a percentage of \$135 billion:

$\$100,000,000 / \$135,000,000,000 = 0.00074074$  or approximately 0.074%

For context:

- Base damages (\$100M) = 0.074% of Meta's annual revenue
- Treble damages (\$300M) = 0.22% of Meta's annual revenue
- Total with punitive (\$400M) = 0.296% of Meta's annual revenue

To put this in perspective:

- This is equivalent to about 6.5 hours of Meta's revenue (Daily revenue  $\approx$  \$370M, so \$100M  $\approx$  6.5 hours)

This relatively small percentage compared to Meta's revenue helps demonstrate that:

1. The damages request is reasonable and proportional
2. The amount would be meaningful to a smaller company but not devastating to Meta
3. The amount is large enough to serve as a deterrent but small enough to be credible
4. It represents a reasonable estimate of actual damages to a startup while being a fraction of Meta's daily operations

### **Key Legal Cases Cited:**

1. FTC v. Meta Platforms, Inc., No. 1:20-cv-03590 (D.D.C.)
2. United States v. Microsoft Corp., 253 F.3d 34 (D.C. Cir. 2001)
3. hiQ Labs, Inc. v. LinkedIn Corp., 938 F.3d 985 (9th Cir. 2019)
4. Klein v. Facebook, Inc., No. 5:20-cv-08570 (N.D. Cal.)
5. Reveal Chat Holdco LLC v. Facebook, Inc., 3:20-cv-00363 (N.D. Cal. 2020)
6. Epic Games, Inc. v. Apple Inc., 559 F. Supp. 3d 898 (N.D. Cal. 2021)

### **Regulatory Actions Cited:**

1. FTC Investigation (2019-2020) File No. 182-3109
2. UK Competition and Markets Authority Investigation (2020)
3. European Commission Preliminary Investigation (2019)

## Appendix

**Exhibit A: Facebook Screencast for App Review Submission July 2018**

**Exhibit B: Nov 7 2020 Update on Facebook API functionality in Veamcast**

**Exhibit C: Correspondences with Facebook Support**

**Exhibit D: Oct 25 2024 Veamcast's Long History of Facebook App Reviews**



## Exhibit A

### Facebook Screencast for App Review Submission July 2018

*10 minutes, 43 seconds*

*Video submitted as ExhibitA.mp4*

*Can also be viewed here:*

<https://www.youtube.com/watch?v=MFZLV2EIVSk>

Video was submitted to Facebook App Review to get its permissions granted on the API. This is a requirement before the app can be distributed publicly. The video demonstrates:

- Logging on Veamcast with Facebook authentication.
- How to create a playlist (or a VEAM) of videos, audio, photos, screenshots and screen recordings, web links, slide shows, snapshots and Facebook posts. A voice mail is used as a sample.

- How to share those playlists with email contacts, post it to the Facebook wall, publish to a Veamcast channel and synchronize the channel with Facebook groups and pages.
- How synchronizing with Facebook Friends used to work although the Plaintiff believes that has already been shut off.
- How Veamcast was implementing a dashboard of Facebook functionality within its app with the features View Facebook Profile, View Veamcast Profile View Feed, Create a Page, View Pages, Manage Groups, Post to Wall and Logoff.
- An example of a Veamcast channel (Long Live Rock!) synchronized with a Facebook page.

## Exhibit B

### Nov 7 2020 Update on Facebook API functionality in Veamcast

*4 minutes, 46 seconds*

*Video submitted as ExhibitB.mp4*

*Can also be viewed here:*

<https://www.youtube.com/watch?v=c2Q8lATngJc>

Video was recorded by the Plaintiff before beginning a revamp of Veamcast removing all functionality that relied on the Facebook API. Facebook had blocked all of the Veamcast functionality, some for just Veamcast, the rest for all third-party developers. The Plaintiff did not know this video was to be used later in a lawsuit but it demonstrates:

- Publishing an audio message to the Facebook wall and the logging and status screen within Veamcast returning an error message “Your message could not be sent because it contains content that other people in Facebook have reported as abusive”. This clearly cannot be true because no one else could have seen it yet.

- Publishing another audio message to a channel which was set up to synchronize with a Facebook page via the API. This time the error he receives says “Service temporarily unavailable” and it was not temporary.
- The other functions of the app which were disabled by Facebook, Synchronize Friends and Publish to Groups.

## Exhibit C

### Correspondences with Facebook Support

*Html and supporting files submitted in a folder named **ExhibitC***

[1]

#### **Correspondence with Facebook Support concerning 'Content Blocked' message**

*July 22 - July 31 2019 saved Oct 27 2019*

*By the time I began saving records, Facebook had been blocking us since 2018. Despite the way the thread ends with them telling us it is unblocked, nothing was changed. Take note of the status changes with each entry. They keep closing it and I have to reopen it.*



#### **Direct Support**

#### **Content blocked**

Created by Joe Dean – July 20 at 9:53 PM

Whenever anything from Veamcast is posted, the message "We can't review this website because the content doesn't meet our Community Standards. If you think this is a mistake, please let us know.". I have clicked LET ME KNOW and asked why many many times and nobody answers. Please help me resolve this!

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#### **Related Apps:**

- [veamcast](#) (112332832127588)



**Sebastian Verde** · Facebook Team

Hello, Thank you for contacting Facebook Direct Support. we have checked you submission history and we saw that some of our agent are able to see the website and some get the page with Community Violation, we are checking this issue internally to see if its not from our side. Thank you have a nice day, Sebastian Verde | Facebook Direct Support

July 22 at 4:21 AM · Status changed to Under Investigation · Edited



**Facebook User**

July 24 at 4:42 AM · Status changed to Closed · Edited



**Joe Dean** · Creator

It is still blocked!

July 24 at 9:21 AM · Status changed to Reopened · Edited



**Joe Dean** · Creator

I have been trying to get this fixed for a long time now... I can't get my app approved... I spent alot of time writing my app... I have been given no reason why I am violating community standards. You can just ban a website with no explanation and no recourse?

July 25 at 4:46 PM



**Joe Dean** · Creator

What am I supposed to do??????????????? You have me blocked and NOBODY will tell me why!!!!!!!!!!!!!!!!!!!!!!!

July 26 at 12:33 PM



**Joe Dean** · Creator

This is really crazy... you just shut my website off with no explanation and nobody is answering any of my MANY requests for why.... How is this legal?

July 26 at 12:38 PM



**Joe Dean** · Creator

Still no response.... Why is my site banned?

July 27 at 12:39 PM



**Joe Dean** · Creator

HOW CAN I GET THIS ADDRESSED?????

July 27 at 10:22 PM





**Brock Lee** · Facebook Team

Hello Joe, Thank you for contacting Facebook Direct Support. Because your site violates our community standards, I have transferred you to a different department that can help you with this issue, sorry for the inconvenience. Thank you have a nice day, Brock Lee | Facebook Direct Support

July 30 at 12:19 PM · Status changed to Need More Info · Edited



**Connie H.** · Facebook Team

Hi Joe, The urls from veamcast has been blocked by Facebook as it was deemed to be in violation of one or more of our Community Standards. In order to appeal this restriction you should click the "appeal" button in the error message you might receive. Thanks Connie July 30 at 3:26 PM · Status changed to Closed · Edited



**Joe Dean** · Creator

Please tell me who the other department is and how to reach them. I've reported this many many times and I'm getting nobody who can tell me why I'm blocked. July 31 at 8:00 PM · Status changed to Reopened · Edited



**Connie H.** · Facebook Team

Hi Joe, Your link has been blocked by Facebook as it was deemed to be in violation of one or more of our Community Standards. In order to appeal this restriction you should click the "Let us know" or "Appeal" in the error message like the attached screenshot. That will guide you to the correct department who can help you on this. Thanks Connie

- [1.png](#)



July 31 at 9:31 PM



**Connie H.** · Facebook Team

July 31 at 9:32 PM · Status changed to Closed · Edited



**Connie H.** · Facebook Team

Hi Joe, Thank you for your patience. I have checked the URL <https://veamcast.com/> again, and there should be no restriction on the url anymore. Thanks, Connie

August 1 at 12:17 AM

This question has been closed for more than 30 days and can no longer be reopened. Please submit a new question if you require further assistance.

### Support Details

Delete

Question Type: Platform Policy

Status: Closed

Business ID: 366662137236140

Business: Veamcast

### Attachments

[1.png](#)

## Subscribers (1)

Add

Joe Dean

[Facebook](#) [Developers](#)

[Privacy Terms](#) [Cookies](#)

[Help](#) [Report a Problem](#)

Facebook © 2019

[English \(US\)](#)

[2]

## Correspondence with Facebook Support concerning the App Review

*Sept 19 - Oct 20 2019 saved Oct 27 2019*

*I was told to re-review at that time... I had been approved and the software had been functioning years prior but it no longer did and never did again. Every time I posted, I would get a message saying the content had been reported as abusive when it was brand new and could not have been seen yet.*

Due to high submission volumes, response time to your request may be delayed. We are actively working to resolve your request and appreciate your patience.



### Direct Support

#### App Review

Created by Joe Dean – September 19 at 12:10 PM

I keep submitting my app for review and it's not getting approved. Can you tell me if you've installed the app and logged on because in my data, I see no evidence that it's been done.

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#### Related Apps:

- [veamcast](#) (112332832127588)



**Rudy Sparreboom** · Facebook Team

Hello Joe, Thank you for contacting Facebook Direct Support. We apologize for any misinterpretation. Please kindly resubmit your application at your own convenience and contact us here again. Best regards, Rudy Sparreboom | Facebook Direct Support

September 19 at 9:47 PM · Status changed to Need More Info · Edited



**Facebook User**

September 21 at 10:41 PM · Status changed to Closed · Edited



**Joe Dean** · Creator

I resubmitted... Please let me know what I can do to get this approved. Thanks

September 22 at 2:23 PM · Status changed to Reopened · Edited



**Prerna Prerna** · Facebook Team

Hello Joe, Thank you for writing back. I apologize for the delay in the response. We do understand that it can be frustrating if things are not going well with your app submission. We do understand that you have re-submitted your application for the user permissions. At the moment, it is still pending review from our review team. Should you require further assistance, do feel free to contact us. Best regards, Prerna | Facebook Direct Support

September 22 at 11:41 PM · Status changed to Need More Info · Edited



**Facebook User**

September 25 at 1:41 AM · Status changed to Closed · Edited



**Joe Dean** · Creator

They approved the request but every time I post something to a facebook page it comes back with a message #368 saying that it was reported as abusive.... even though it was just created.

September 25 at 8:17 PM · Status changed to Reopened · Edited



**Joe Dean** · Creator

This was content just created.

- [Facebook.jpg](#)



September 25 at 8:20 PM



**Joe Dean** · Creator

Everything that was created using Veamcast on your entire platform has been deleted with no notice!!!!

September 25 at 8:47 PM



**Jack Anderson** · · Facebook Team

Hello Joe, Thank you for writing back. We do understand that it can be frustrating if things are not going well with your app submission. Please be kindly informed that we have escalated your case to the responsible team. As soon as we receive a resolution we will contact you back. Best regards, Jack Anderson | Facebook Direct Support

September 30 at 9:50 AM · Status changed to Under Investigation · Edited



**Jack Anderson** · · Facebook Team

Hello Joe Dean, Thank you for contacting Facebook Direct Support. After reviewing your question, I've noticed that your question pertains to debugging tooling issues. You may find more information regarding the Sharing Debugger tool at <https://developers.facebook.com/tools/debug> to help to further troubleshoot your issue. Best regards, Jack Anderson | Facebook Direct Support

October 1 at 8:39 AM · Status changed to Need More Info · Edited



**Joe Dean** · Creator

They do not respond

October 1 at 9:28 AM · Status changed to Reopened · Edited



**Marcus Tan** · · Facebook Team

Hello Joe, Thank you for contacting Facebook Direct Support. Your application has been successfully approved and is ready to go. This support channel is for questions about App Review for Facebook Login. Since it looks like you don't have any other questions related to App Review, I'm going to close this ticket. If you have questions regarding the Community Standards error message you have been receiving, you might want to visit the Developer Community Forum:



<https://developers.facebook.com/community> Thank you for your understanding. Cheers, Marcus Tan | Facebook Direct Support

October 4 at 1:32 AM · Status changed to Closed · Edited



**Joe Dean** · Creator

THEY DO NOT RESPOND!

October 4 at 4:13 PM · Status changed to Reopened · Edited



**Joe Dean** · Creator

The error only happens in the app... It doesn't happen when I do it via the debugger. October 4 at 4:16 PM



**Chris Deniro** · Facebook Team

Hello Joe, Thank you for contacting Facebook Direct support. While I am open to resolving your problem, your problem does not fall within our scope. This support channel is for questions about App Review. If you have questions regarding the Community Standards error message you have been receiving, you might want to visit the Developer Community Forum:

<https://developers.facebook.com/community> I hope you find the answer you need. . . Should you require any more assistance relating to your App review, feel free to contact us again. Kind regards, Chris Deniro | Facebook Direct Support

October 9 at 11:06 AM



**Joe Dean** · Creator

I can't believe this. All the work we put into this app and you're giving me this erroneous error and NOBODY will respond to the issue... How can somebody be reporting content that has just been created and not published yet as abusive?????? Who can I contact to fix this bug???? Nobody answers! October 9 at 1:25 PM



**Joe Dean** · Creator

We have users that spent a great deal of time publishing their channels and it was all deleted with no notice whatsoever and no explanation whatsoever... I need to hire a lawyer... this is anticompetitive October 9 at 1:34 PM



**Joe Dean** · Creator

The link you sent has no method of appealing for me. The link at the bottom is for people who has lost access to the app. I haven't found any way to address this other than this forum here... It's within the realm of the app review since the message I get only happens in the app. It used to happen when things were just posted but that's resolved although somehow everything all my users posted is gone off Facebook. it's amazing they'll do that without explaining anything.

- [Facebook.jpg](#)

October 10 at 7:25 PM · Status changed to Reopened · Edited



**Joe Dean** · Creator

There were hundreds or thousands of posts that are all just gone. It's been tragic for my business October 10 at 7:26 PM



**Chris Deniro** · Facebook Team

Hello Joe, Thank you for contacting Facebook Direct support. While I am open to resolving your problem, your problem does not fall within our scope. This support channel is for questions about App Review. If you have questions regarding the Community Standards error message you have been receiving, you might want to visit the Developer Community Forum:

<https://developers.facebook.com/community> As much as I want to help, there is nothing I can do about this as it does not fall under the purview of what we do through this channel. In terms of the content being reported sadly that is outside the scope of App Review. Since your content is being flagged I would suggest doing an appeal at this provided link: <https://developers.facebook.com/appeal>. They will look into why it is your application and content you are publishing is getting flagged automatically. Kind regards, Chris Deniro | Facebook Direct Support

October 14 at 8:42 AM · Status changed to Need More Info · Edited



**Joe Dean** · Creator

Chris, the appeal link you're sending me does not give me a way to appeal this!

October 14 at 10:01 AM · Status changed to Reopened · Edited



**Joe Dean** · Creator

Is there a phone number I can call? This is crazy!

October 14 at 10:01 AM



**Chris Deniro** · · Facebook Team

Hello Joe

I have raised an internal task, We would update you as we get more information.

Kind regards,

Chris Deniro I Facebook Direct Support

,

October 15 at 6:58 AM · Status changed to Under Investigation · Edited



**Joe Dean** · Creator

Thank you!

October 15 at 7:55 AM



**Joe Dean** · Creator

Just tried again... I posted a picture of my daughter and I get that disgusting message that it's been reported as abusive... This has to stop!!! My users can not get these messages! It costs me money to tell them that Facebook will not do anything about this! It's been months and hundreds of messages to you guys.... There is no due process with you guys??? You just ban apps without any explanation? Is it because my app is deemed as competition and you guys just wipe out the competitors this way????

- [Image 2.jpg](#)

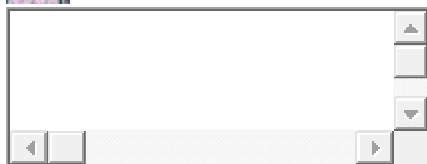


October 20 at 7:26 PM

**Write a comment**

Status

**Under Investigation (No Status Change)**



Add Attachments

**Submit**

**Support Details**

**UnsubscribeDelete**

Question Type: App Review

Status:

**Under Investigation (No Status Change)**

Business ID: 366662137236140

Business: [Veamcast](#)

**Attachments**

[Facebook.jpg](#)

[Facebook.jpg](#)

[Image 2.jpg](#)

**Subscribers (2)**

## Add

Calvin Walker II

Joe Dean

[Facebook](#) [Developers](#)

[Privacy Terms](#) [Cookies](#)

[Help](#) [Report a Problem](#)

Facebook © 2019

[English \(US\)](#)



[3]

## Correspondence with Facebook Support concerning the OAuth bug

*Aug 6 - Sept 4 2020 Saved sept 4 2020*

*Thread with Jacky Le Nghia where he acknowledges the issue and attempts to address it. There was one more entry I didn't catch where he told me again it was fixed, I sent him another test link showing it wasn't. These last two entries are missing as the entire thread was removed before I could take another snapshot.*

*It would take an understanding of the technology to prove this point, but these troubleshooting attempts didn't really seem to be aimed at the actual trouble, seeming to be more of an obstacle and delay tactic. The last link they sent me to was ad linking although my issue has nothing to do with ads.*

*We did everything they asked until they gave up and deleted the entire thread.*

*This is proof positive of corporate malfeasance. This ended our willingness to continue using the Facebook API therefore requiring a complete rework of our app.*

Getting (OAuthException - #2) Error when posting to page feed - domain verification

Assigned

Last Updated Aug 24, 2020 at 8:01 PM

Thanks for submitting your bug report!

What happens next?

We aim to respond within 24 hours, during business days.

In the meantime, here are some other resources you might find helpful:

- **Facebook Platform Bugs** - Get updates about your bug, or other bugs relevant to you.
- **Facebook Platform Status** - Check on any outages that might be affecting your app.
- **Tools & Support** - Troubleshoot issue with your app, using our debugging tools; upgrade to the latest version of our APIs, using the API Upgrade Tool; explore other helpful resources.

Affected App: **veamcast**

- Product:
- API & SDK
  - Page / Page Posts
  - Graph API

Last Known Working Date: Dec 31, 2017

Graph API Info

Tokens: None

Attachments: None

Open Assigned Resolved

1 Our team is looking into this - we will let you know as soon as we have an update on how we are moving forward.

**Joe Dean**  
Aug 8, 2020, 8:31 PM

It's been happening so long I don't have an exact last known working date... it did work back in 2018

Code Samples

```
private string PostToPage(string strPageID, string strChannelName, string strPackageID)
{
    try
    {
        string url = string.Format("{0}/{1}", strPageID, "feed");

        string strThumbnailURL = strThumbnail;

        if ((strThumbnailURL.ToLower().StartsWith("http"))
            strThumbnailURL = "http://syncstor.s3.amazonaws.com/" + strOwnerID
        else
            strThumbnailURL = strThumbnailURL.Replace("mqdefault", "hqdefault")

        var argList = new Dictionary<string, object>();

        argList["name"] = strSubject;
        argList["message"] = strTag;
        argList["description"] = strTag;
        argList["picture"] = strThumbnailURL;
        // add channel

        string urlToPost = ViewingURL + "&viewer=facebook&channel=" + strChann
        urlToPost = urlToPost.Replace("viewek.aspx", "veam.aspx");
        argList["link"] = urlToPost;
        argList["type"] = "veam";

        string pageAccessToken = LookupAccountToken(strPageID);

        if (string.IsNullOrEmpty(pageAccessToken))
        {
            PostLogEntry("no token found for page:");
            return null;
        }

        var fb = new FacebookClient(pageAccessToken);

        var result = (JsonObject)fb.Post("feed", argList);

        string strResult = result.ToString();

        string strID = result["id"].ToString();
        //PostLogEntry("posting " + strSubject + " " + strResult);
        return strID;

    }
    catch (Exception ex)
    {
        App.FacebookPage.AllPagesPostsLogEntry(PostEntryType.ErrorEntry, ex.Me
        // HERE IS THE MESSAGE IS (OAuthException - #2) (#2) Service temporarily unavailable"

        return ex.Message;
    }
}
```

Comment

1 subscriber

## Comments



**Jacky Le Nghia** · · Facebook Team

Hi Joe,

Thanks for getting in touch. In order to assist me in being able to reproduce this issue, would you be able to provide me with the following:

1. A saved Graph API Explorer session that includes your query. Once you get a response, please select "Save Session". When a new window opens, please copy its address from the address bar and paste it here.
2. The access token that you are using with the call. Please provide the token by using the "Confidential Reply" option.

You can find both of these using the Graph API Explorer tool, linked here: <https://developers.facebook.com/tools/explorer/>

Jacky Le

Reply · Confidential Reply · Aug 6, 2020, 10:28 PM · Status changed to Need More Info



**Joe Dean** · · Creator ·

[https://developers.facebook.com/tools/explorer/112332832127588/?session\\_id=722070835239712](https://developers.facebook.com/tools/explorer/112332832127588/?session_id=722070835239712)

EAABmKoaOOmQBAKTOZArY03Y0wBbQyiyaZBiM2kqZB4R1OxGtZCnDasW  
ZBKcticWfWsnBsAWzSKfomEekmz9uBYDTVJSta0krZAZAZAisaR7y3YtlGcbM  
Uxkprtnbdn68jxKwY3ZAasklj9YfpFOfKLA3L67HMAx5o7yrf0FI5GBpsSdSQ  
OTxeeOdMnZB39AcLPaAZD

Aug 7, 2020, 2:09 PM · Status changed to Reopened

Access Tokens Redacted



**Jacky Le Nghia** · · Facebook Team

Hi Joe,

Thanks for providing the session.

From your code, look like you are posting to a page, with `strPageID`. However, with User Access Token, and post request to `/feed`, it will post to User's timeline instead of the Page.

That explains why the error message is different when you use Graph Explorer compare to the once you see on your application's log.

Could you please provide the page id, as well as giving us the permission to repro the call? Please note that if the call is successful, a post will be posted to your Page's feed.

Jacky Le

Reply · Confidential Reply · Aug 10, 2020, 9:07 AM · Status changed to Need More Info



**Joe Dean** • ★ • Creator

PageID:

"1574848035877226"

Page Name:

"Long Live Rock"

Here is how I lookup the token:

```
string LookupAccountToken(string strPageID)
{
    if (FacebookAccounts.Count == 0)
        LoadFacebookAccounts();

    foreach (var account in FacebookAccounts)
    {
        if (account.id == strPageID)
            return account.access_token;
    }
    return string.Empty;
}
```

Reply • Confidential Reply • Aug 10, 2020, 12:18 PM • Status changed to Reopened



**Jacky Le Nghia** • f • Facebook Team

Hi Joe,

Thanks for the page ID, could you give us permission to reproduce on this page?

Additionally, look like your type parameter you used is deprecated (<https://developers.facebook.com/docs/graph-api/reference/v7.0/page/feed>)

Jacky Le

Reply • Confidential Reply • Aug 10, 2020, 11:09 PM • Status changed to Need More Info



**Joe Dean** • ★ • Creator

changed "type" to "link"... same issue... you have permission to reproduce issue

Reply • Confidential Reply • Aug 11, 2020, 9:05 AM • Status changed to Reopened



**Jacky Le Nghia** • f • Facebook Team

Hi Joe,

Thanks for granting the permission.  
After retrying using this post POST / /v8.0/1574848035877226/feed

It returns with error message

"message": "(#100) Only owners of the URL have the ability to specify the picture, name, thumbnail or description params."

In this case, you will need to verify that you are the owner of this URL.  
Here is the document that provide more information:  
<https://developers.facebook.com/docs/sharing/domain-verification/>

Hope this helps,  
Jacky Le

Reply • Confidential Reply • Aug 12, 2020, 1:13 AM • Status changed to Confirm Resolution



**Joe Dean** · ★ · Creator

Domain verified... problem persists... thanks



Reply · Confidential Reply · Aug 12, 2020, 3:53 PM · Status changed to Reopened



**Jacky Le Nghia** · f · Facebook Team

Hi Joe,

Thanks for verify the domain.  
We've managed to reproduce the issue from the info you shared here. I'm assigning this to our engineering team for further investigation. I'll update this thread when I have more information from the team.

Thanks!  
Jacky Le

Reply · Confidential Reply · Aug 13, 2020, 10:59 AM · Status changed to Assigned



**Joe Dean** · ★ · Creator

would like to request a status update... it's getting close to the critical path and our feature launch will be delayed. it's been like this for a very long time.



Reply · Confidential Reply · Aug 19, 2020, 10:34 AM



**Jacky Le Nghia** · f · Facebook Team

Hi Joe,

Thanks for your patience.  
After checking, our engineer has confirmed that, you have verified the domain, however, you will need to add permitted pages for link editing function.  
To do so, please follow this document:  
<https://developers.facebook.com/docs/sharing/domain-verification/ad-link-editing>

Hope this verified things,  
Jacky Le

Reply · Confidential Reply · Aug 20, 2020, 11:09 PM · Status changed to Confirm Resolution



**Joe Dean** · ★ · Creator

I have it now set to 'Anyone can edit ad links' but the problem persists. I waited at least a day and at the bottom it says 'These settings are currently active'.



Reply · Confidential Reply · Aug 22, 2020, 3:04 PM · Status changed to Reopened



**Jacky Le Nghia** · f · Facebook Team

Hi Joe,

Thank you for your information and sorry for your inconvenient.  
I will take it back to our engineers to do further check in this case

Jacky Le

Reply · Confidential Reply · Aug 24, 2020, 8:01 PM · Status changed to Assigned



**Joe Dean** · ★ · Creator

would like to request another status update...



[Reply](#) · [Confidential Reply](#) · Sep 1, 2020, 7:18 PM



**Joe Dean** · ★ · Creator

would like to request another status update... thanks



[Reply](#) · [Confidential Reply](#) · 1 min

Add a comment

Select Status ▼

Submit

[4]

## Bug Closed

Saved Sept 30 2020

*Previous thread with Jacky Le Nghia replaced with page below which contains Bug Report Closed Entry... The thread is no longer available to us anywhere on Facebook and if I didn't save a copy of this, it would all be impossible for me to prove. This absolutely proves deliberate intent, corporate malfeasance and bad faith actions on the part of Meta.*

The screenshot displays the Facebook App Dashboard for an application named 'veamcast' (App ID: 112332832127588). A prominent blue notification banner at the top right states: "Bug Report Closed. A bug report related to your app has been closed." with a "resolved" status and a date of "22 September 25".

The main content area is divided into two columns. The left column, titled "Alerts", shows a list of notifications:

- Bug Report Closed** (resolved, 22 September 25): A bug report related to your app has been closed.
- Permission or Feature Access Expired** (attention, September 23): Access to certain permissions or features has expired due to lack of use.
- Permission or Feature Access Expired** (attention, August 23): Access to certain permissions or features has expired due to lack of use.
- App Compliant - URL Compliance** (resolved, July 10): Facebook Platform Policy - Issue Resolved.
- Permission or Feature Access Expired** (attention, July 8): Access to certain permissions or features has expired due to lack of use.

The right column, titled "Bug Report Closed", shows a list of resolved bug reports:

- Bug Report Closed** (resolved): Your bug report "Getting (OAuthException - #2) Error when posting to page feed - domain verification" has been updated. If required, please provide additional details and steps that will assist us in reproducing the issue. (September 24)
- Bug Report Closed** (resolved): Your bug report "Getting (OAuthException - #2) Error when posting to page feed - domain verification" has been updated. If required, please provide additional details and steps that will assist us in reproducing the issue. (September 24)
- Bug Report Closed** (resolved): Your bug report "Getting (OAuthException - #2) Error when posting to page feed - domain verification" has been updated. If required, please provide additional details and steps that will assist us in reproducing the issue. (September 20)
- Bug Report Closed** (resolved): Your bug report "Getting (OAuthException - #2) Error when posting to page feed - domain verification" has been updated. If required, please provide additional details and steps that will assist us in reproducing the issue. (September 18)

The dashboard includes a left-hand navigation menu with options like Dashboard, Settings, Roles, Alerts, Inboxes, App Review, and Activity Log. The top navigation bar contains links for Docs, Tools, Support, My Apps, and a search bar for developer documentation.

## Exhibit D

### Oct 25 2024 Veamcast's Long History of Facebook App Reviews

*3 minutes, 7 seconds*

*Video submitted as ExhibitD.mp4*

*Can also be viewed here:*

<https://www.youtube.com/watch?v=n0eW480-zb4>

In this video, Plaintiff discusses the long history of App Review he went through showing approval at the end and in early stages beginning in 2015.



**Contact Info:**

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