

REPUBLIC OF THE PHILIPPINES )

CITY OF OLONGAPO . . . . . ) S.S.

**COMPLAINT-AFFIDAVIT**

I,

**GEOFFREY ARTHUR STOW,**

of legal age, British national, with resident address at [REDACTED]  
Olongapo City, Zambales, after having been duly sworn to in accordance with law, hereby  
depose and state that:

**I am the Founder and Managing Director of Redberry Software (UK) Ltd, with nearly 50 years of commercial software development expertise. I submit this Affidavit not only as a data subject but as a technical expert in the field of automated systems and software infrastructure.**

**MOTION TO WAIVE THE USE OF THE PRESCRIBED FORM**

The Complainant moves for the Commission to waive the requirement of using the July 2025 "Complaint-Affidavit Template" due to technical defects and script corruption found in the PDF document, which rendered it unusable for this complex technical narrative. This filing is made in **Substantial Compliance** with the NPC's Rules of Procedure.

**STATEMENT OF FACTS**

1. That on December 9, 2025, my Facebook account (facebook.com), associated with the email address geoff.stow@redberry.com, was deactivated by **Meta Platforms International Operations Philippines Inc.**, with office address at Floor 32, Menarco Tower, 32nd Street, Bonifacio Global City, Taguig.
2. That the deactivation was based on an allegation of "Sexualisation of Children," which I categorically deny as false, baseless, and defamatory.
3. That the decision was made through **Automated Decision-Making (ADM)** without meaningful human intervention, violating my rights under the Data Privacy Act of 2012 and **NPC Advisory No. 2024-04**.
4. **EVASION OF SERVICE:** Since March 2026, I have made **nine (9) distinct attempts** to serve formal notice via PhilPost (2 shipments), J&T Express (3 attempts), and LBC (3 attempts), as well as two (2) portal inquiries to building management. The Respondent has willfully and systematically evaded service at its registered SEC address, with official courier logs specifically noting: "**Recipient Refused to Accept**" and "**No Reason to Reject without Opening the Box.**" Documentary proof is attached as **Annexes B through E**.
5. **TECHNICAL CERTIFICATION OF MAIL INFRASTRUCTURE:** As the Administrator of the mail infrastructure (**redberry.com**) hosted on **Microsoft Azure**, I certify that all digital communications with the Respondent and the Commission utilize a professionally managed SMTP relay (**SMTP2GO**) to ensure delivery integrity. I have verified the **SMTP handshakes (250 status)** for recent communications and further certify that no Non-Delivery Reports (NDRs) or "Bounces" were received for prior notices, confirming successful delivery to the recipients' gateways. (See **Annex B and Annex E**).
6. Pursuant to **Section 8, Rule 13 of the Rules of Court**, service is deemed complete five (5) days after the first PhilPost notice. Therefore, **Constructive Service was finalized on April 4, 2026**, and the Respondent is currently in **Administrative Default**.

7. That I formally demand that the Respondent cease and desist from deleting any associated data and preserve all logs, metadata, and algorithmic logic used by Meta AI in triggering this deactivation.
8. **FORMAL ADMISSION OF TENANCY BY LESSOR:** On May 3, 2026, Menarco Development Corporation (the Lessor) formally responded to my digital service of the refused notice. In their response, the Lessor explicitly confirmed that **Meta is a tenant at Menarco Tower, located at 32nd Street, BGC.** This admission is critical as it invalidates any potential defense regarding an incorrect address. Furthermore, the fact that the Lessor responded to a digital inquiry while building security simultaneously refused nine (9) physical delivery attempts (as documented in Annexes B through E) proves a **selective and willful blockade** of legal service at the building's point of entry. (See **Annex G**).

**PRAYER FOR RELIEF**

I respectfully pray that the Commission:

- Issue an Order directing the Respondent to suspend the automated deletion of my account and data;
- Order the Respondent to provide a clear explanation of the logic used by Meta AI in reaching this decision;
- Compel a manual, human-led review of the deactivation by a qualified moderator;
- Impose administrative fines for the Respondent's failure to maintain a reachable Data Protection Officer (DPO) at their registered SEC address.

IN WITNESS WHEREOF, I have hereunto set my hand this Sunday of May 2026 at Olongapo City, Philippines.

**VERIFICATION AND CERTIFICATION AGAINST FORUM SHOPPING**

I, **GEOFFREY ARTHUR STOW**, under oath, depose and state that:

1. I am the Complainant in the above-entitled case;
2. I have caused the preparation of the foregoing Complaint-Affidavit;
3. I have read the contents thereof and the facts stated therein are true and correct of my own personal knowledge and/or based on authentic records;
4. I have not commenced any action or filed any claim involving the same issues in any court, tribunal, or quasi-judicial agency and, to the best of my knowledge, no such other action or claim is pending therein.
5. If I should thereafter learn that a similar action or proceeding has been filed or is pending before any other court, tribunal, or quasi-judicial agency, I undertake to report that fact within five (5) days therefrom to the National Privacy Commission.



**GEOFFREY ARTHUR STOW**

Affiant

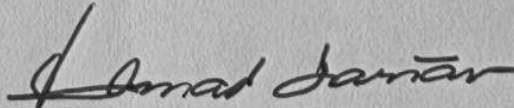
SUBSCRIBED AND SWORN to before me this 5<sup>th</sup> day of May 2026 at Olongapo City, affiant exhibiting to me his Driver's License with number [REDACTED]

Doc. No. 472;

Page No. 96;

Book No. CXLII

Series of 2026.



**CAROLYN J. SENADOR-FARIÑAS**  
Notary Public

City of Olongapo and in the Province of Zambales  
Appl. No. 2024-0-16 valid until December 31, 2026  
2284 Rizal Ave., East Bajah-Bajah, Olongapo City  
R. of Attorney's No. 37817  
MCLE Compliance No. VNI-0018809 valid until April 14, 2028  
PTR No. 213657812; Jan. 05, 2020; San Felipe, Zambales  
IBP No. 575161; Dec. 29, 2025; Pasig City

**Annex List: (Digitally Signed)**

- **Annex A:** Supplemental Narrative (Professional Background).
- **Annex B:** PhilPost Logs & Follow-up Emails.
- **Annex C:** J&T Express Logs (The "Refusal without Opening").
- **Annex D:** LBC Express Logs (The "Recipient Refused").
- **Annex E:** Menarco Building Management Portal/Phone Logs.
- **Annex F:** Original Notarized NPC Pre-Alert (Ignored).
- **Annex G:** Formal Response from Menarco Development Corp (Admission of Tenancy).

A handwritten signature in black ink, located on the left side of the page. The signature is stylized and appears to be a cursive name, possibly starting with 'A' and ending with 'a'.