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Attorneys for Plaintiff ALISON WHITE,  
individually, and for all others similarly  
situated

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**WESTERN DIVISION**

ALISON WHITE, an individual, on  
behalf of herself and all others  
similarly situated,

Plaintiff,

v.

RING LLC, a Delaware Limited  
Liability Company; THE HOME  
DEPOT, INC. dba HOME DEPOT  
U.S.A., INC., a Delaware Corporation;  
AMAZON.COM SERVICES LLC dba  
AMAZON.COM, INC., a Delaware  
Corporation; DOES 1 through 100,  
inclusive,

Defendants.

Case No.

**CLASS ACTION COMPLAINT  
FOR VIOLATIONS OF:**

- (1) CONSUMER LEGAL  
REMEDIES ACT, Cal. Civ. Code  
§§ 1750, *et seq.*;
- (2) FALSE ADVERTISING LAW,  
Cal. Bus. & Prof. Code §§ 17500,  
*et seq.*;
- (3) UNFAIR COMPETITION LAW,  
Bus. & Prof. Code §§ 17200, *et  
seq.*;
- (4) NEGLIGENT  
MISREPRESENTATION;
- (5) INTENTIONAL  
MISREPRESENTATION; and
- (6) BREACH OF EXPRESS  
WARRANTY, Cal. Comm. Code  
§§ 2313, *et seq.*

**DEMAND FOR JURY TRIAL**

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## I. INTRODUCTION

1. Plaintiff ALISON WHITE (“Plaintiff” or “Ms. White”), individually, and on behalf of all others similarly situated, brings this consumer Class Action Complaint against Defendants RING LLC (“Ring”); THE HOME DEPOT, INC. doing business as HOME DEPOT U.S.A., INC. (“Home Depot”); and AMAZON.COM SERVICES LLC doing business as AMAZON.COM, INC. (“Amazon”), and Does 1 through 100 inclusive, collectively, “Defendants,” for unlawful, unfair, and deceptive business practices in violation of (1) California’s Consumer Legal Remedies Act, California Civil Code sections 1750, *et seq.*; (2) California’s False Advertising Law, California Business and Professions Code sections 17500, *et seq.*; (3) California’s Unfair Competition Law, California Business and Professions Code sections 17200, *et seq.*; (4) Negligent Misrepresentation; (5) Intentional Misrepresentation; and (6) Breach of Express Warranty, California Commercial Code sections 2313, *et seq.* in response to Defendants’ false and misleading promotion of its security products known as the Jobsite Security 5-Piece Starter Kit and Ring Protect Pro subscription.

2. Defendants’ packaging, website, advertisements, and marketing materials associated with Defendant Ring’s Jobsite Security 5-Piece Starter Kit represents to consumers that Jobsite Security Kit, when used in conjunction with a Wi-Fi internet connection and a Pro Subscription with enrollment in “24/7 professional monitoring,” Defendant Ring will automatically “handle it” and “call the authorities and resolve it for you,” when in fact, the Jobsite Security Kit and Pro Subscription are not capable of this advertised functionality. Users must call authorities themselves or instruct Defendant Ring to do so when the users are prompted. Defendants effectively sold purchasers a “911 speed dial” button purchasers can press when purchasers see that their motion sensors have been triggered.

## II. NATURE OF THE ACTION

3. Defendants Ring and Amazon manufacture, distribute, market, and sell the Jobsite Security 5-Piece Starter Kit (“Jobsite Security Kit”) to be used in

1 conjunction with Defendant Ring's Ring Protect Pro subscription ("Pro  
2 Subscription").

3 4. Defendant Home Depot has partnered with Defendants Ring and Amazon  
4 to distribute, market, and sell this Jobsite Security Kit. The Jobsite Security Kit is  
5 available for purchase exclusively at Defendant Home Depot's retail stores nationwide  
6 and via Defendant Home Depot's website [www.homedepot.com](http://www.homedepot.com).<sup>1</sup>

7 5. Since its release to customers in or around October 2021, the price for the  
8 Jobsite Security Kit has been \$399.99, which includes an Alarm Pro Base Station,  
9 Stick Up Cam Battery, Motion Sensor, Spotlight Battery, and a Powered Case.

10 6. Defendant Ring advertises the Jobsite Security Kit on its website as "a  
11 flexible security system for contractors that adds wifi to your site. Easily move the  
12 devices around. Take the system to different sites. And protect your valuable tools and  
13 materials from anywhere, anytime."<sup>2</sup>

14 7. Defendant Ring's website markets the Jobsite Security Kit as a device  
15 that allows you to "be on the job when you can't be," and to "[c]onnect to Ring security  
16 cameras, lights, and motion sensors to create an always-on security system, and  
17 control it all from the Ring App."<sup>3</sup>

18 8. Defendant Ring offers the Pro Subscription, which is a no-contract  
19 subscription service available for use with the Jobsite Security Kit that permits  
20 subscribers to "[g]et notifications, see what's happening in real-time, remotely activate  
21 your lights or security siren, and control all your Ring devices from one simple  
22 \_\_\_\_\_

23 <sup>1</sup> Purported affiliate Venue.com holds itself out as an authorized seller of the Jobsite  
24 Security Kit. (The Jobsite Security Kit "is authorized for sale under an affiliate  
25 agreement with Home Depot and shipped by Home Depot.")  
26 [https://venue.com/product/jobsite-security-5-piece-starter-kit/?utm\\_source=Google-Shopping&utm\\_medium=WP-cpc&utm\\_campaign=2022-WP-VENUE-2022&utm\\_source=google-ads&utm\\_campaign=utm%20smartshoppinggoogle&utm\\_agid=138281687430&utm\\_term=&creative=587433261022&device=c&placement=&gclid=EAIaIQobChMI743n48Ld9gIVBR6tBh3X-ARSEAYYAiABEGKnkFD\\_BwE](https://venue.com/product/jobsite-security-5-piece-starter-kit/?utm_source=Google-Shopping&utm_medium=WP-cpc&utm_campaign=2022-WP-VENUE-2022&utm_source=google-ads&utm_campaign=utm%20smartshoppinggoogle&utm_agid=138281687430&utm_term=&creative=587433261022&device=c&placement=&gclid=EAIaIQobChMI743n48Ld9gIVBR6tBh3X-ARSEAYYAiABEGKnkFD_BwE) (last accessed March 23,  
27 2022).  
28 <sup>2</sup> <https://ring.com/jobsite-security> (last accessed March 24, 2022).

1 dashboard in the Ring App.”<sup>4</sup> Defendant Ring markets the subscription as “a  
 2 comprehensive subscription service that lets you review, share, and save every video  
 3 and photo captured by your Ring device and opt-in to 24/7 professional monitoring.”<sup>5</sup>  
 4 In reference to “24/7 professional monitoring,” Defendant Ring provides that “Ring  
 5 Alarm Pro and Ring Alarm professional monitoring service is available only within  
 6 the U.S. (all 50 states, but not U.S. territories). Ring does not own its own professional  
 7 monitoring center. Additional charges may apply in areas that require permits or guard  
 8 response service for alarm verification. Tax not included. Enrollment required.”<sup>6</sup>

9         9. The current price for the Pro Subscription is \$20 per month if purchased  
 10 on a monthly basis or \$200 per year with an annual purchase.

11         10. The packaging of the Jobsite Security Kit also advertises that, when used  
 12 in conjunction with a Wi-Fi internet connection and a Pro Subscription with  
 13 enrollment in “24/7 professional monitoring,” Defendant Ring will “handle it” and  
 14 “call the authorities and resolve it for you.”<sup>2</sup> Footnote 2 states in pertinent part, “Ring  
 15 Alarm Pro and Ring Alarm professional monitoring service is available within the  
 16 U.S. (all 50 states, but not U.S. territories). Ring does not own its own professional  
 17 monitoring center. Additional charges may apply in areas that require permits or guard  
 18 response service for alarm verification. Tax not included. Enrollment for Ring Protect  
 19 Pro and opt-in for professional monitoring is required (each separately).”<sup>7</sup>

22 <sup>4</sup> [https://ring.com/protect-plans?utm\\_source=google&utm\\_medium=cpc&utm\\_campaign=833107590&utm\\_term=ring%20doorbell%20subscription%20plans&utm\\_content=66897173502&gclid=EAIaIQobChMIInsLXpb3d9gIVmxitBh0t\\_QvmEAAAYAiAAEgJTI\\_D\\_BwE&gclid=EAIaIQobChMIInsLXpb3d9gIVmxitBh0t\\_QvmEAAAYAiAAEgJTI\\_D\\_BwE](https://ring.com/protect-plans?utm_source=google&utm_medium=cpc&utm_campaign=833107590&utm_term=ring%20doorbell%20subscription%20plans&utm_content=66897173502&gclid=EAIaIQobChMIInsLXpb3d9gIVmxitBh0t_QvmEAAAYAiAAEgJTI_D_BwE&gclid=EAIaIQobChMIInsLXpb3d9gIVmxitBh0t_QvmEAAAYAiAAEgJTI_D_BwE) (last  
 23 accessed March 23, 2022).

24 <sup>5</sup> [https://ring.com/protect-plans?utm\\_source=google&utm\\_medium=cpc&utm\\_campaign=833107590&utm\\_term=ring%20doorbell%20subscription%20plans&utm\\_content=66897173502&gclid=EAIaIQobChMIInsLXpb3d9gIVmxitBh0t\\_QvmEAAAYAiAAEgJTI\\_D\\_BwE&gclid=EAIaIQobChMIInsLXpb3d9gIVmxitBh0t\\_QvmEAAAYAiAAEgJTI\\_D\\_BwE](https://ring.com/protect-plans?utm_source=google&utm_medium=cpc&utm_campaign=833107590&utm_term=ring%20doorbell%20subscription%20plans&utm_content=66897173502&gclid=EAIaIQobChMIInsLXpb3d9gIVmxitBh0t_QvmEAAAYAiAAEgJTI_D_BwE&gclid=EAIaIQobChMIInsLXpb3d9gIVmxitBh0t_QvmEAAAYAiAAEgJTI_D_BwE) (last  
 25 accessed March 23, 2022).

26 <sup>6</sup> *Id.*

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