# Google Facing Litany Of Charges

San Francisco - A suite of lawsuits describes Google's indiscretions in intimate detail. The charges include: **PATENT INFRINGEMENT**, **INTENTIONAL INTERFERENCE WITH CONTRACTUAL RELATIONS, INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE, CYBER-STALKING, FRAUD, INVASION OF PRIVACY** and **UNFAIR COMPETITION** as a **CLASS ACTION** relative to Defendants ongoing activities relative to violations of Anti-Trust laws. The later seeks to bring the "Right-To-Be-Forgotten" law to the United States. A jury trial is being demanded. The cases are being brought in the state of California, home to both Plaintiffs and Defendants. Google/Alphabet and various "John Does"., 1 to 20, are being sued based on revelations from U.S. Senate, law enforcement and private investigators as well as recent leaks and whistle-blower tips from ex-employees and associates of Google.

The timeliness of the cases directly connect to a number of concurrent historical incidents which include the European Union investigations of Google, The Hulk Hogan and Erin Andrews privacy lawsuits, the winning of smaller, similar cases against Defendants (ie: http://www.techworm.net/2015/12/australian-woman-wins-100000-Defendants-failing-remove-search.html ) , the Snowden, HSBC and Guccifer Leaks, and the thinly disguised expose on Google in the Netflix TV series ***HOUSE OF CARDS***, ie:
( http://www.globalscoop.net/wp-content/uploads/House-of-Cards-Exposes-Defendants-.mp4 )
( https://videos.files.wordpress.com/MRku6Zp1/house-of-cards-exposes-Defendants_fmt1.ogv )

**CASE OVERVIEW – Update 2.1:**

The case describes how, in, 2005, the Plaintiffs, received, in recognition by the United States Congress, in the "Iraq War Bill", a Congressional commendation and a federal grant issued by the United States Congress and the United States Department of Energy, plus additional access to resources as, and for, the development of fuel cell and energy storage technology to be used in connection with the research and development of an electric car to be deployed by the Department of Defense and the American retail automotive market in order to create domestic jobs, enhance national security and provide a domestic energy solution derived from entirely domestic fuel sources. Plaintiff's had been asked, by government leaders, to help develop a manner to reduce reliance on foreign fuel sources due to perceived increasing unrest in Middle East regions.

Beginning in, or about, July of 2006, the Plaintiffs, were contacted by various investors representing the venture capital officers and investors of the Defendants posing as agents of Defendants *RechargeIT* project, Kleiner Perkins Group, In-Q-Tel and associated other parties funded by, and reporting to, Defendants. These investors feigned interest in the emerging technology and requested further information from the Plaintiffs in this regard. In or about August of 2009, the fuel cell and electric vehicle project of the Plaintiffs, was suddenly de-funded as to the Plaintiffs. The same funds for the research and development of electric car technology was then, subsequently in the same year, awarded to the Defendants, and their investors, for the exploitation of non-domestic energy materials which Defendants hold stock and managing control of the source and supply chain for, via a sophisticated series of relationships between Defendants and competing electric vehicle efforts to Plaintiffs. SEC and regulatory investigations have now tracked Defendants, and the public policy figures who they paid, to stock ownerships in lithium and indium mining operations in overseas locations such as Afghanistan: A

surprising development since Plaintiffs had been told, by some Government leaders that they wanted to ***decrease*** reliance on overseas domestic fuel options. Those mining efforts supply raw materials to companies such as Tesla, Solyndra, Abound, Fisker, and others which Defendants own interest and stock market valuation incentives in, and which are the direct competitors of Plaintiffs.

In, or about September, 2009 the Plaintiffs, were contacted by the Government Accountability Office of the United States with a request that they participate in an investigation being conducted by that entity into the business practices of the Defendants and their associates, pursuant to anti-trust and corruption allegations. Beginning in or about January, 2010, the Plaintiffs, did, in fact, provide testimony to the Government Accountability Office of the United States, The Department of Justice, The Federal Bureau of Investigation, NHTSA Administrator David L. Strickland (Who suddenly quit thereafter), Robert Gibbs (Who suddenly quit thereafter), and their staff at the White House Press Office and the Washington Post White House Correspondent. The testimony provided by the Plaintiffs, was, in fact, truthful and did, in fact, tend to support the veracity of the anti-trust and corruption allegations alleged by the Government Accountability Office and other investigatory agencies. It appeared that Defendants had bribed state and federal public officials.

In, or about, 2009-2011 Defendants exchanged funds with tabloid publications and those tabloid publications "coincidentally" published two attack articles and an animated attack video including false, defamatory, misleading and manufactured information belittling the Plaintiffs and discrediting their reputation.

The Plaintiffs, and their lawyers contacted the Defendants, with over 30 written requests that it delete the false, defamatory, misleading and manufactured information belittling the Plaintiffs and discrediting their reputation from its websites. Defendants provided full and extensive proof to Defendants that the Defendants publications were promoting false propaganda about Plaintiffs. Independent of such provided proof, Defendants were fully aware that the media attack links were false.

All of the written demands of the Plaintiffs, were to no avail and none of the Defendants, agreed to edit, delete, retract or modify any of the false, defamatory, misleading and manufactured information belittling the Plaintiffs, and discrediting their reputation from their websites.

The Plaintiffs, whose businesses, had already suffered significant damage as the result of the online attacks of the Defendants contacted renown experts and especially Search Engine Optimization (SEO) and forensic internet technology (IT) experts to clear and clean the internet of the false, defamatory, misleading and manufactured information belittling the Plaintiffs.

None of the experts hired by the Plaintiffs, at substantial expense, were successful in their attempts to clear, manage or even modify the false, defamatory, misleading and manufactured information belittling the Plaintiffs, which only Defendants, the controlling entity of the internet, refused, in writing, to remove. All efforts, including efforts to suppress or de-rank the results of a name search for Plaintiffs failed and even though tests on other brands and names, for other unrelated parties did achieve balance, the SEO and IT tests clearly proved that Defendants was consciously, manually, maliciously and intentionally rigging it's search engine and adjacent results in order to "mood manipulate" public perceptions in a coordinated media attack on Plaintiffs. Plaintiffs placed hundreds of test servers around the globe to prove and validate Defendants manual, conscious and intentional internet manipulations. Since then, other researchers from various nations, including Robert Epstein, a

psychologist at the American Institute for Behavioral Research and Technology, conducted similar tests and concluded the same results.

In fact, the experts, all of them, instead, informed the Plaintiffs, that, not only had the Defendants locked the false, defamatory, misleading and manufactured information belittling the Plaintiffs, discrediting their reputation into its search engine so that the information could never be cleared, managed or even modified, the Defendants had assigned the false, defamatory, misleading and manufactured information belittling the Plaintiffs, discrediting their reputation "P8" algorithmic internet search engine code, and similar covert embedded link codes, embedded in the internet information-set programmed into Defendants internet architecture. "P8" standing is standing assigned and programmed into the internet, by the Defendants to matters it designates as dependable and true therefore attributing primary status as the most significant and important link to be viewed by online researchers regarding the subject of their search. Defendants locked hidden codes into the searches on Plaintiff wherein Defendants stated that the malicious attacks were "Facts", according to Defendants, and not "opinions". This is a clear violation of human rights law.

At all times pertinent from January, 2011 to in, or about, November, 2015, the Defendants, maintained that it had no subjective control or input into the rankings of links obtained by online researchers as the result of a search on its search engines and that it's search engine algorithms and the functions of it's media assets were entirely "arbitrary"

In or about April 2015, The European Commission took direct aim at Defendants, charging the Internet-search giant with manually skewing search results

In those proceedings, although the Defendants, continued to maintain that it had no subjective control or input into the rankings of links obtained by online researchers as the result of a search on its search engines and that it's staff had no ability to reset, target, mood manipulate, arrange adjacent text or links, up-rank, down-rank or otherwise engage in human input which would change algorithm, search results, perceptions or subliminal perspectives of consumers, voters, or any other class of users of the world wide web, also known as The Internet, the court, in accord with evidence submitted, determined that the Defendants, does in fact have and does in fact exercise subjective control over the results of information revealed by searches on its search engine. The EU case, and subsequent other cases, have demonstrated that Defendants sells such manipulations to large clients in order to target their enemies, or competitors, or raise those clients subliminal public impressions against competitors or competing political candidates.

As a result of receiving this information, the Plaintiffs, became convinced of the strength and veracity of their original opinion that the Defendants, had, in fact posted the false, defamatory, misleading and manufactured information belittling the Plaintiffs, discrediting their reputation as an inventor, project developer and project designer had been intentionally designed, published, orchestrated and posted by them in retaliation to the true testimony provided by the Plaintiffs, to the Government Office of Accountability of the United States and to the Securities and Exchange Commission, The Federal Bureau of Investigation, The United States Senate Ethics Committee and other investigating parties, and had been disseminated maliciously and intentionally by them in an effort to do damage to their reputation and to their business prospects and to cause him severe and irremediable emotional distress.

In fact, the Plaintiffs, has suffered significant and irremediable damage to their reputation and to their

financial and business interests. As a natural result of this damage, as intended, by the Defendants the Plaintiffs, has also suffered severe and irremediable emotional distress.

To this day, despite the age of the false, defamatory, misleading and manufactured information belittling the Plaintiffs, discrediting their reputation, in the event any online researcher, searches for information regarding the Plaintiffs, the same information appears at the top of any list of resulting links on, and only on, Defendants web entities. Presidential Candidates have now conducted research on similar attacks on themselves and found that the same tactics were deployed against them, thus confirming the veracity of Plaintiffs findings.

Plaintiffs were asked by U.S. Government representatives to support the domestic automotive market in order to create domestic jobs, enhance national security and provide a domestic energy solution derived from entirely domestic fuel sources. The Defendants knew of the above described contractual relationship existing between the Plaintiffs, and the United States Department of Energy in that the funding was made public record and, at the request of representatives of the Venture Capital group of the Defendants, the Plaintiffs, Plaintiffs believing that the request for information was as to providing additional funding for the project, did, in fact, submit information regarding the subject of the government funding to the Defendants and their agents.

The Defendants, who had, and have personal, employee, stock ownership and business relationships with executive decision-makers at the United States Department of Energy and other Federal and State officials, lobbied those executive decision-makers to cancel, interfere and otherwise disrupt the grant in favor of the Plaintiffs with the intention of terminating the funding in favor of the Plaintiffs, and applying the information they pirated from the Plaintiffs, for their own benefit as well as terminating Plaintiff's competing efforts, which third party industry analysts felt could obsolete Defendants and YouTube's efforts.

The Defendants, were successful in its efforts and, in or about August of 2009, the grant in favor of the Plaintiffs, was summarily canceled and re-routed to Defendants and their agents.

The Defendants, and its owners commenced to take credit for advancement in its own technology based on the information it had pirated from the Plaintiffs.

The interference of the Defendants, with the relationship of the Plaintiffs, was intentional and constitutes an unfair business practice under in violation of Business and Professions code section 17200. Individuals approached Plaintiffs offering to “help” Plaintiffs get their ventures funded, or managed. Those individuals were later found to have been working for Kleiner Perkin's the founding investor of Defendants and other current share-holder of Defendants. Plaintiffs discovered that those “helpful” individuals were helping to sabotage development efforts and pass intelligence to Defendants.

As a proximate result of the conduct of the Defendants and severance and termination and redirection of the state and federal funds to the Plaintiffs, the Plaintiffs, have suffered damages including financial damage, damage to their reputation and loss of critical intellectual property. The aforementioned acts of the Defendants were willful, fraudulent, oppressive and malicious. The Plaintiffs is therefore entitled to punitive damages.

In or about the fall of 2009, when the Plaintiffs, discovered that their grant from the United States Department of Energy had been terminated, circumvented, redirected and de-funded, the Plaintiffs, of course, informed other members of the law enforcement and Congressional community of the facts of Defendant's behavior and specifically the behavior that gave rise to termination and redirection of the funding

The Defendants became aware that the Plaintiffs were intent on telling the truth about these facts, about true ownership of the intellectual property relied on by Defendants in its own vehicle, energy and internet media technology and about Defendant's theft of Plaintiffs property.

In order to put a stop to the Plaintiffs, and in an effort to discredit them, divest them of contacts in the industry and also interdict financial backing, the Defendants enlisted the services of their associated tabloid publishers, known to be financially connected to Google and the other Defendant's own wide array of media and branding manipulation tools which are service offerings of Defendants.

In 2011, Defendants associates at the tabloid published “hatchet job” articles attacking the Plaintiffs. They were the only publication in the world to undertake such character assassination hatchet jobs, which, now, in historical retrospect, make it glaringly obvious that they were the operators of that portion of the media hit-job. Defendants posted a self-produced animated video which depicted the Plaintiffs, in a horrific light as part of their character assassination program to mitigate Plaintiffs position before a federal Special Prosecutor, which was sought for public hearing at the time.

Plaintiffs reputation, which is based on a vast portfolio of U.S. Government issued patents for the invention of globally renown inventions, hundreds of letters of reference and commendations from Mayoral, state, federal, corporate and White House leaders, is unimpeachable. Because Plaintiffs career has been based entirely on positive word-of-mouth from successfully completed projects. Plaintiffs sought to destroy the income potential and testimony credibility of Plaintiffs with their malicious and coordinated attack.

In an attached BACKGROUND SHEET with the lawsuits, documentation is provided proving that the Defendants, did significant damage to the reputation of the Plaintiffs, in the technology community.

Defendants have paid tens of millions of dollars to the tabloid media covertly associated with Google and has a business and political relationship with said tabloid media.

Also, as intended by the Defendants, this damage, especially because the false representations become immediately apparent to anyone conducting an internet search for “Plaintiffs,” have caused investors to shy away from the Plaintiffs, causing the Plaintiffs, further difficulty in obtaining funding from about 2011 to the present time and have placed attack information on HR and job hiring databases so that negative and damaging red flags about Plaintiffs, relative to the tabloid and Defendants attacks will prevent future work opportunities. Additionally, representatives from Defendants sent a copy of the attack article to the employer of Plaintiffs via their HR office and communicated with said employer that “You don't want him working for you with this kind of article out there, do you?” Resulting in their termination. Defendants staged this revenue interdiction by reaching out to an employer of Plaintiffs and sending the Defendants false and defamatory material to the HR Department of a major corporate entity where Plaintiff was employed to travel across the United States to review the new national health-care system roll-out.

As a proximate result of the conduct of the Defendants, the Plaintiffs, have suffered severe financial damage as the result of loss of their good will and reputation. The aforementioned acts of the Defendants, were willful, fraudulent, oppressive and malicious. The Plaintiffs is therefore entitled to punitive damages.

By hiring and/or making an arrangement with associated tabloids to publish an article replete with false and misleading statements disparaging the Plaintiffs, in the guise of publishing opinion, the Defendants intended to harass the Plaintiffs and did in fact harass the Plaintiffs.

By refusing to remove the offending publication and, in fact, assigning it a value associated with "truth" and a position in its web browser that came up and still comes up the first and most prominent link pursuant to any search for the Plaintiffs, Plaintiffs and maintaining this link for the past 5 years as permanent, un-editable and unmovable, the Defendants intended and continues to intend to harass the Plaintiffs. Eric Schmidt and Larry Page of Google have publicly testified that Google search results are mercurial, constantly changing, and modified hundreds of times a day or week. How could that even remotely be true if attacks, such as those on Plaintiffs, are locked in the same exact search results positions for over five years? Larry Page has been in direct competition with Plaintiff since prior to the creation of Google and, in fact, many feel that one of Plaintiff's company's which existed, operated online, was patented and confirmed by the Government long before Google was even formed, was possibly copied by Page to form Google, as was the same case with Plaintiffs internet video company; the first in the world and now duplicated as YOUTUBE.

Defendants have reported to the SEC that they have made over $120 billion dollars in profits off of technologies which Plaintiff first developed, engineered, received issued U.S. patents affirming Plaintiff as inventor, launched start-ups for and was contact by Defendants under the guise of "venture capitol discussions" in order to execute fishing expeditions to harvest technology as reported in the New York Times article: *"**How Larry Page's Obsessions Became Google's Business"***

By doing the things described in paragraphs above, the Plaintiffs, Defendants, did and does continue to intend to cause the Plaintiffs substantial emotional distress and the Plaintiffs, commencing in or about their discovery of the post and the link has and continues to experience substantial emotional distress as any reasonable person would.

The Defendants engaged in the pattern of conduct described above with the intent to place the Plaintiffs in reasonable fear for their safety or in reckless disregard for the safety of the Plaintiffs. Multiple associates of Google including Rajeev Motwani, Forrest Hayes, Gary D. Conley and many investment bankers, suddenly died under mysterious circumstances. This creates credible cause for safety concerns by Plaintiff. Cyber-Stalking laws emphasize the danger to a party caused by actions such as those engaged in by Defendant. By arranging for publication of the subject article and ensuring that the subject article could not be moved or altered and would be certain to appear first and permanently as the result of any search for the Plaintiffs intended to do significant damage to Plaintiff's brand, reputation, social life, employment, financial interests and other value sets of Plaintiff. This was in retaliation for their testimony at the proceedings described above and to ensure that the Plaintiffs would have not future as a competitor in the world of technology populated by the Plaintiffs and the Defendants.

The Plaintiffs did contact Defendants with numerous written, telephonic and personal requests to remove the offending content. As above, in response to the request of the Plaintiffs regarding removal of the attacks, the Defendants stated that has no control over the results of any search on its search engine and that algorithm, refused to and continues to refuse to allow any member of the public to search for the Plaintiffs without publishing results that falsely identify the Plaintiffs in an attacking mis-characterization. The Defendants made this statement with the intent to induce the Plaintiffs to rely on it.

The Plaintiffs continued to rely on the statement and to believe that the Defendants has not power or authority to manipulate the results of searches conducted on its search engine until in or about 2015 when it became clear as the result of the litigation commenced in the EU by that Defendants does in fact have such ability and does, in fact, exercise this ability regularly to manipulate and manage any of the results of any search on its engine. The representations made by the Defendants were in fact false.

When the Defendants made these representations, he/she/it knew them to be false and made these representations with the intention to deceive and defraud the Plaintiffs and to induce the Plaintiffs to act in reliance on these representations in the manner hereafter alleged, or with the expectation that the Plaintiffs would so act.

The Plaintiffs, at the time these representations were made by the Defendants and at the time the Plaintiffs took the actions herein alleged, was ignorant of the falsity of the Defendants representations and believed them to be true. In reliance on these representations, the Plaintiffs was induced to, and did believe the representations by Google. Had the Plaintiffs known the actual facts, he/she would not have taken such action. The Plaintiff's reliance on the Defendants representations was justified because public officials, who had the same information, had not taken law enforcement action against Plaintiff. Plaintiff was not, at the time, aware that some of those public officials had been receiving funds from Defendants.

As a proximate result of the fraudulent conduct of the Defendants as herein alleged, the Plaintiffs were induced to expend extensive hours of their time and energy in an attempt to derive a profit from their business but has received no profit, or other compensation, for their time and energy, by reason of which the Plaintiffs has been damaged in the sum of $B.

The aforementioned conduct of the Defendants(s) was an intentional misrepresentation, deceit, or concealment of a material fact known to the Defendants(s) with the intention on the part of the Defendants(s) of thereby depriving the Plaintiffs of property or legal rights or otherwise causing injury, and was despicable conduct that subjected the Plaintiffs to a cruel and unjust hardship in conscious disregard of the Plaintiff's rights, so as to justify an award of exemplary and punitive damages.

**Relative to the Invasion of Privacy and The Right-to-be-Forgotten**

The Plaintiffs hereby incorporate by reference the allegations set forth previously inclusive as though fully set forth herein. The Defendants, first by arranging for and allowing/posting the tabloid articles, then by coding a link to the article that permanently placed the article at the top of any search results for the Plaintiffs has invaded the inalienable privacy rights of the Plaintiffs, Plaintiffs as protected by Article I section 1 of the Constitution of the State of California.

The intrusion commenced in or about April of 2011 and continues to this day, is significant and remains unjustified by any legitimate countervailing interest of the Defendants.

For five years, when any member of the public searches on the Defendants search engine, for the Plaintiffs the first link to pop up refers to the Plaintiffs, Plaintiffs in an attacking mis-characterization.

The pervasiveness and longevity of this link plus its placement at the very top of any search result has resulted in a significant, albeit intentional interference with the right of the Plaintiffs to engage in and conduct personal and business activities, to enjoy and defend life and liberty, acquiring possessing and protecting property and pursuing and obtaining safety, happiness and privacy.

The facts disclosed about Plaintiffs were and remain false. Even in the event the tabloid article might have at one time garnered protection by the First Amendment as opinion regarding a public controversy and about a semi-public figure, no further controversy exists or even could.

Five years have passed and, despite the lack of current content of controversy, the Plaintiffs remains saddled with a personal, permanent and immovable reference on the internet that characterizes him as "scoundrel" in the world of internet technology.

The Plaintiffs has done the best they could in these years to move on with new projects and new investors. He has made every effort to start anew and has been precluded from doing so by the Defendants attacks.

Maintenance of the original posting of April 2011 for five years is offensive and objectionable to the Plaintiffs and certainly would be to a reasonable person of ordinary sensibilities in that the original posting is false and defamatory and was intentionally arranged for by Defendants so as to do significant damage to the personal and professional reputation of the Plaintiffs, because it has accomplished this damage, because there is no manner other than at the Defendant's hand by which the link can be altered or removed or the search results edited or limited and because there exists no reason that the Plaintiffs should not be allowed to enjoy a right to move on with is life independent of a label that had no basis in truth and reality in the first place. The facts regarding the character of the Plaintiffs included in the tabloid article are certainly no longer of any legitimate public concern nor are they newsworthy nor are they tied to any current controversy or dialogue.

IN FACT, THE Plaintiffs, can truly no longer be considered a public figure or even a semi-public figure as the tabloid article has fairly successfully put him out of business and kept him out of business for the past five or more years.

In making the disclosure described above, Defendants were guilty of oppression, fraud, or malice, in that Defendants made the disclosure with (the intent to vex, injure, or annoy Plaintiffs *or* a willful and conscious disregard of Plaintiff's rights . Plaintiffs therefore seeks an award of punitive damages.

Defendants have threatened to continue disclosing the above information. Unless and until enjoined and restrained by order of this court, Defendant's continued publication will cause Plaintiffs great and irreparable injury in that Plaintiffs will suffer continued humiliation, embarrassment, hurt feelings, and mental anguish). Plaintiffs has no adequate remedy at law for the injuries being suffered in that a judgment for monetary damages will not end the invasion of Plaintiff's privacy.

The Plaintiffs brings this action on their own behalf and on behalf of all persons similarly situated. The class that the Plaintiffs represents is composed of all persons who, at any time since the date four years before the filing of this complaint, sought to have offensive, irrelevant and outdated material posted to the internet and available through a search on the Defendant's search engine corrected, removed or re-ranked and have been informed by the Defendants that the Defendants that the Defendants does not have the ability to do so and state Defendant's published policy.

The persons in the class are so numerous, an estimated 39% of the population of the United States of America, that the joinder of all such persons is impracticable and that the disposition of their claims in a class action is a benefit to the parties and to the court.

There is a well-defined community of interest in the questions of law and fact involved affecting the parties to be represented in that each member of the class is or has been in the same factual circumstances, hereinafter alleged, as the Plaintiffs. Proof of a common or single state of facts will establish the right of each member of the class to recover. The claims of the Plaintiffs are typical of those of the class and the Plaintiffs will fairly and adequately represent the interests of the class.

There is no plain, speedy, or adequate remedy other than by maintenance of this class action because the Plaintiffs is informed and believes that each class member is entitled to restitution of a relatively small amount of money, amounting at most to $5,000.00 each, making it economically infeasible to pursue remedies other than a class action. Consequently, there would be a failure of justice but for the maintenance of the present class action.

The Defendants are a business incorporated in the State of California and at all times herein mentioned owned and operated a its search engine and its ancillary commercial enterprises from its headquarters in Santa Clara, California.

Any search on the Defendant's search engine for “Plaintiffs” resulted and to this day still results in a display of the tabloid article with the Plaintiffs Plaintiffs described as a scoundrel in the first line of the Defendants link.

The Plaintiffs, directed extensive requests to the Defendants to unlink the tabloid publication to any search for their name or to delete the offending article. The Defendants, responded by stating that it had no ability or legal obligation to do so as the request didn’t fall within its own policies for removal. The position of the Defendants is illegal, false and unfair.

The position of the Defendants is illegal as it infringes on the rights of individuals as protected by the Constitution of the State of California which protects the rights and freedoms of individuals to [All people are by nature free and independent and have inalienable rights. Among these are enjoying and defending life and liberty, acquiring, possessing, and protecting property, and pursuing and obtaining safety, happiness, and privacy.]

The position of the Defendants is unfair as it deprives individuals of rights protected by the Constitution of the State of California which protects the rights and freedoms of individuals to [All people are by nature free and independent and have inalienable rights. Among these are enjoying and defending life and liberty, acquiring, possessing, and protecting property, and pursuing and obtaining

safety, happiness, and privacy.]

The position of the Defendants, is false because, as a processor of personal information and a controller of that information, the Defendants also possesses the technical, logistical and political power and ability to delete, re-rank and re-direct any information obtained as the result of a search on its search engine.

As a direct, proximate, and foreseeable result of the Defendant's wrongful conduct, as alleged above, the Plaintiffs Plaintiffs and millions of others other members of the Plaintiffs class, who are unknown to the Plaintiffs but can be identified through inspection of the Defendant's records reflecting requests for removal it has already received and by other means, have been subjected to unlawful and unwanted publication of in accurate, inadequate, irrelevant, false, excessive, malicious and defamatory internet postings about themselves and as a result of the Defendant's present policies, have thereby been deprived of their right to privacy and the right to control information published about them as this control now apparently is vested in the Defendants, INC and not in and of themselves.

The Plaintiffs is entitled to relief, including full restitution for the unfair practices of the Defendants as these have damaged their reputation and their business prospects and deletion or de-ranking of any article naming them as a "scoundrel" as inaccurate and currently irrelevant.

The Defendants, has failed and refused to accede to the Plaintiff's request for a removal of the offending article or for any de-ranking or separation of the article from a search for their name. The Plaintiffs is informed and believes and thereon alleges that the Defendants has likewise failed and refused, and in the future will fail and refuse, to accede to the requests of other individuals requests for removal, de-ranking or the separation of search results from a simple search for their name.

The Defendant's acts hereinabove alleged are acts of unfair competition within the meaning of Business and Professions Code Section 17203. The Plaintiffs is informed and believes that the Defendants will continue to do those acts unless the court orders the Defendants to cease and desist.

The Plaintiffs has incurred and, during the pendency of this action, will incur expenses for attorney’s fees and costs herein. Such attorney’s fees and costs are necessary for the prosecution of this action and will result in a benefit to each of the members of the class. The sum of $500,000.00 is a reasonable amount for attorney’s fees herein.

The Plaintiffs are informed and believe and based on that information and belief allege that at all times mentioned in the within Complaint, all Defendants were the agents and employees of their co-Defendants and, in doing the things alleged in this Complaint, were acting within the course and scope of such agency and employment.

As to any corporate employer specifically named or named as a DOE herein, the Plaintiffs are informed and believe and therefore allege that any act, conduct, course of conduct or omission, alleged herein to have been undertaken with sufficient, malice, fraud and oppression to justify an award of punitive damages, was, in fact, completed with the advance knowledge and conscious disregard, authorization, or ratification of and by an officer, director, or managing agent of such corporation.

In those proceedings, although the Defendants, continued to maintain that it had no subjective control or input into the rankings of links obtained by online researchers as the result of a search on its search

engines and that it's staff had no ability to reset, target, mood manipulate, arrange adjacent text or links, up-rank, down-rank or otherwise engage in human input which would change algorithm, search results, perceptions or subliminal perspectives of consumers, voters, or any other class of users of the world wide web, also known as The Internet, s, the court, in accord with evidence submitted, determined that the Defendants, does in fact have and does in fact exercise subjective control over the results of information revealed by searches on its search engine. The EU case, and subsequent other cases, have demonstrated that Defendants sells such manipulations to large clients in order to target their enemies or competitors or raise those clients subliminal public impressions against competitors or competing political candidates.

The interference of the Defendants, with the relationship of the Plaintiffs, was intentional and constitutes an unfair business practice under in violation of Business and Professions code section 17200. Individuals approached Plaintiffs offering to “help” Plaintiffs get their ventures funded or managed. Those individuals were later found to have been working for Kleiner Perkin's the founding investor of Defendants and current share-holder of Defendants. Plaintiffs discovered that those “helpful” individuals were helping to sabotage development efforts and pass intelligence to Defendants

As a proximate result of the conduct of the Defendants and severance and termination of the grant to the Plaintiffs, , the Plaintiffs, have suffered damages including financial damage, damage to their reputation and loss of critical intellectual property.

The aforementioned acts of the Defendants were willful, fraudulent, oppressive and malicious. The Plaintiffs is therefore entitled to punitive damages.

The aforementioned conduct of the Defendants(s) was an intentional misrepresentation, deceit, or concealment of a material fact known to the Defendants(s) with the intention on the part of the Defendants(s) of thereby depriving the Plaintiffs of property or legal rights or otherwise causing injury, and was despicable conduct that subjected the Plaintiffs to a cruel and unjust hardship in conscious disregard of the Plaintiff's rights, so as to justify an award of exemplary and punitive damages.