

**FILED**

JUN 15 2012

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
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**Amanda U. Ajuluchuku, Plaintiff**  
2810 Gateway Oaks Dr.  
Sacramento, CA 95833  
Phone (310) 228-7629  
Email: amandaajuluchuku@yahoo.com

2:12CV1607 KJM-DAD (PS)

*This complaint is being sent via certified mail on June 12, 2012  
This is the first time I'm suing Google*

**June 12, 2012**

**Google**  
1600 Amphitheater Parkway RA  
Mountain View, California 94043  
Phone (650) 643 -4000  
Attn: CEO Larry Page

**In the United States District Court of California at Sacramento**

**Amanda U. Ajuluchuku** } **Judge**  
**Plaintiff** } **Magistrate Judge**  
**Vs.** } **No.**  
**GOOGLE** } **COMPLAINT**  
**DEFENDANT** } **UNLAWFUL DISCRIMINATION**

**COMPLAINT**

1 Clerk (I'm enclosing three signed original copies)

2           Your Honor, I've been homeless since two jealous women kidnapped my son,  
3 Justus Jason Ajuluchuku in Owings Mills, Maryland the day before my June 21, 2003  
4 birthday. My son and I were on our way to Massachusetts to continue our studies. I had  
5 been accepted at a law school. In June 2003, I had enrolled him at University of  
6 Massachusetts. I home schooled him. He earned his high school equivalency diploma at  
7 16. When he was 16, he attended Strayer University. At 17, I transferred him to Morgan  
8 State University in Baltimore, Maryland. However, he never made it to Massachusetts.  
9 One jealous woman, Lisa Davies (Pitch-black) lured him to her home. Next, she drugged  
10 him. Even though, I filed a Missing Persons Report with Officer Pfeiffer (White) of  
11 Baltimore County Police Department, a female police officer, Bradley (Jewish) refused  
12 to return him to me when she found him in Ms. Davies' home. Instead, she also  
13 kidnapped him. Four months later, my beloved father died of anxiety. It goes without  
14 saying, jealous women abducted my only child and killed my father in 2003. Since his  
15 abduction, they have hauled him back and forth to jail. They also force him to have sex  
16 with men dressed as women. Your Honor, this sounds like the Jaycee Dugard case.  
17 California Police could have rescued Jaycee Dugard several times. However, police  
18 refused to follow leads. If anything, they were accomplices in abducting her. It's their  
19 job to rescue victims from violence. If one refuses to do so, one should also be held liable  
20 as it "It takes a village to raise a child." That's why, Jaycee Dugard received twenty  
21 million dollars from the State of California. Your Honor, I have gone to 24 federal  
22 courts seeking justice for my son's return. Each time, jealous females blocked my  
23 attempts. They libeled me vexatious in an attempt to stop me. If anything, I should be  
24 commended. I have been able to provide employment for more than 200 defense  
25 attorneys since June 2003. Yes, I enhanced the economy. Why not? I earned a Bachelor's  
26 degree in Economics and Mathematics from City University of New York. I was straight  
A student in all of my MA/MBA/JD programs. When these jealous females saw I was an  
A student, they ousted me out of the programs. Fortunately, I received letters of praise  
from some MBA professors and the law firm I labored at during my undergraduate  
studies. This is the 25th federal court. My father was a journalist. He instilled hard work  
and honesty in me. I promised him I would bring my son home. I also promised him I  
would fight for all children. My enemies had expected me to have a nervous break down.  
Instead, I reached for the stars. I remembered children who were murdered by means of  
abortions, those being starved and abducted. I intend to challenge Roe versus Wade.  
Since then, I've been fighting passionately for them. I've been asking for the proceeds to  
be doled out to several children's organizations, my son, and I. My pleas fell on their  
deaf ears. I pray you would allow me to proceed in your court. What's more, these  
jealous females have blocked many things. They've gone to great lengths to keep me  
poor so that I would never rescue my son. If any man expresses interest in me, they  
threaten to kill him. According to statistics, more women in America than men suffer  
depression. These women ought to be looking for men in other countries if they can't  
find suitable men in America. They spend their time being jealous of me and my men.  
For instance, there are millions of single men in China. As a matter of fact, some

1 American men are married to Chinese women. I have not yet seen an American woman  
2 with a Chinese man. I attended high school in France. French women understand the  
3 magnitude of marriage. Some of them are married to non-French men. I also pray you  
4 would bring back my son. It's been almost nine years. I have not seen him. He deserves  
5 to be home. California is his home. He attended elementary and middle schools in  
6 Torrance, California. Finally, I pray you would grant my In forma Pauperis (IFP) in  
7 three cases namely, State of Maryland, Google and Victoria's Secret. I also have about  
8 twenty more cases to litigate on behalf of all children, my son, and I. I would if I were  
9 making money. I might add that I plan to resume law school in Fall 2012. Because of my  
10 homelessness and physical disability (Federal question), I'm entitled to file my cases in  
11 your court. Given that several Defendants reside in other states (Diversity), I'm also  
12 entitled to litigate these suits in this court. Most importantly, Defendants can afford to  
13 fly their witnesses (not more than 2) to California. Due to my dire financial straits, I  
14 can't afford to fly to their states. On February 21, 2012, a Father was the one who bailed  
15 me out of New York State. Thank you, Your Honor.

#### 10 COMPLAINT

11 1). In August 2011, I journeyed from Los Angeles/Atlanta to New York City for a  
12 modeling assignment. Instead, I became stranded when the company refused to assign  
13 me. Next, I started blogging on Defendant' blogspot. The title of my blogspot is Marriage  
14 Made in Heaven or Hell? Because I believe in family values, I blog about marriages. For  
15 the most part, I write about celebrities' marriages. As expected, I declare 90% of  
16 marriages made in heaven. Since I promote family values, I don't declare any marriages,  
17 "Made in Hell." I would rather take the 5th. To that end, I issue a disclaimer as in,  
18 "Taking the 5th does not mean that the marriage is made in hell. It means the parties  
19 should consider taking it it to heaven."

20 2). Next, Defendant informed me about making money by promoting ads on my  
21 blogspot, [www.amandauche21.blogspot.com/](http://www.amandauche21.blogspot.com/) Of course, I agreed. Each ad listed the pay  
22 per clicks. And if a customer buys the product, I would receive commission. Most clicks  
23 paid \$1.00 a click. A handful of them paid \$20.00 a click.

24 3). Since September 2011, I started writing blogs on Defendant's blogspot. Since  
25 October 2011, I started promoting more than 100 ads from different companies so that I  
26 could return to Los Angeles. Defendant pays quarterly. I should have been paid in  
January 2012 for the almost 17,000 clicks I accumulated from October 2011 until  
December 2011. However, Defendant blocked them in a desperate attempt to keep me  
poor and stop me from leaving NYC. I was dirt poor. I slept in NYC subway (trains).  
Furthermore, I endured 5 asthma attacks. They were life-threatening. It wasn't until  
February 21, 2012, when a Father from a Catholic Church paid for my flight via United  
Airlines that I returned to California. I believe Defendant walked hand in hand with my  
enemies to keep me poor and prevent me from leaving NYC. I might add that when I  
filed my 2011 taxes in January 2012, New York State claimed I owed them back taxes.  
IRS ended up paying them. Your Honor, they misrepresented facts to stop me from  
leaving. They intentionally falsely imprisoned me. I don't owe a dime to New York.  
Thank You, Your Honor.

1 4). I believe I have been discriminated against based upon my race, Black color,  
2 color, Light-skinned, Sex, female, National Origin (Father, Nigerian, Mother, American)  
3 and physical disability (recurring deafness and dizziness) which are in violation of Title  
4 VII of the Civil Rights Act of 1964, as amended, the Age Discrimination in Employment  
5 Act of 1967 and the Americans with the Disabilities Act of 1990, as amended.

6 **PRAYER FOR RELIEF**

7 Your Honor, I would like Defendant apologize to me. Additionally, I would like  
8 you to order Defendant to pay me nine million dollars for breach of contract and  
9 unlawful discrimination as well as back wages comprising more than 17,000 clicks and  
10 commissions. I believe several people made purchases. I promote my blogspot on  
11 Twitter, Facebook, myspace and word of mouth. Not surprisingly, Defendant has not  
12 bothered to disclose them. Finally, I would like you to order Defendant to allow me to  
13 resume blogging. I enjoy promoting family values. I'm an advocate for children. I'm  
14 attaching the federal right to sue letter as well as charge from EEOC. This money would  
15 be doled out to several children's organizations, my son and I. I'm attaching the federal  
16 right to sue letter as well as charge from EEOC. This money would be doled out to  
17 several children's organizations, my son and I. Thank you, Your Honor.

18 /s/Amanda U. Ajuluchuku  
19 Amanda U. Ajuluchuku, Plaintiff

  
6/2/12

EEOC Form 5 (11/09)

<b>CHARGE OF DISCRIMINATION</b> <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>	Charge Presented To: _____ Agency(ies) Charge No: _____ <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC <span style="float: right;"><b>480-2012-01661</b></span>
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**California Department Of Fair Employment & Housing** and EEOC  
State or local Agency, if any

Name (indicate Mr., Ms., Mrs.) <b>Ms. Amanda Ajuluchuku</b>	Home Phone (Incl. Area Code) <b>(310) 228-7629</b>	Date of Birth <b>06-21-1968</b>
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Street Address City, State and ZIP Code  
**General Delivery, Beverly Hills, CA 90210**

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name <b>GOOGLE</b>	No. Employees, Members <b>500 or More</b>	Phone No. (Include Area Code) <b>(650) 623-4000</b>
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Street Address City, State and ZIP Code  
**1600 Amphitheater, Mountain View, CA 94043**

Name	No. Employees, Members	Phone No. (Include Area Code)
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Street Address City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

<input checked="" type="checkbox"/> RACE	<input checked="" type="checkbox"/> COLOR	<input checked="" type="checkbox"/> SEX	<input type="checkbox"/> RELIGION	<input checked="" type="checkbox"/> NATIONAL ORIGIN
<input type="checkbox"/> RETALIATION	<input checked="" type="checkbox"/> AGE	<input checked="" type="checkbox"/> DISABILITY	<input type="checkbox"/> GENETIC INFORMATION	
<input type="checkbox"/> OTHER (Specify)				

DATE(S) DISCRIMINATION TOOK PLACE  
 Earliest: **09-01-2011** Latest: **03-19-2012**  
 CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

- I. On or about 09/01/2011, I was hired by Google as a Blogger. From on or about 09/01/2011, through the present, I have been subjected to different terms and conditions of employment, that includes, but is not limited to, not paying me for the number of clicks and commission when individuals access Google from my blogspot.
- II. No reason has been given to me for the different terms and conditions.
- III. I believe I have been discriminated against based on my race, Black, color, Light Skinned, sex, Female, national origin, Nigerian, age, 43, and my disability which is in violation of Title VII of the Civil Rights Act of 1964, as amended, the Age Discrimination in Employment Act of 1967, as amended, and the Americans with Disabilities Act of 1990, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the above is true and correct.	NOTARY - When necessary for State and Local Agency Requirements  I swear or affirm that I have read the above charge and that it is to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT  SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)
Mar 19, 2012 Date <span style="float: right;">Charging Party Signature</span>	

EEOC Form 161 (11/09)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: Amanda Ajuluchuku  
General Delivery  
Beverly Hills, CA 90210

From: Los Angeles District Office  
255 E. Temple St. 4th  
Los Angeles, CA 90012

On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.	EEOC Representative	Telephone No.
480-2012-01660	LaTayna X. Valentine, Intake Supervisor	(213) 894-1090

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
- The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge
- The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- Other (briefly state) **No Employee/Employer relationship.**

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

*LaTayna Valentine*

Olophius E. Perry,  
District Director

*4/3/2012*  
(Date Mailed)

Enclosures(s)

cc: David Drummond  
Sr. VP, Chief Legal Officer  
GOOGLE  
1600 Amphitheatre Parkway  
Mountain View, CA 94043

UNITED STATES DISTRICT COURT

for the

Amanda U. Ajuluchuku

Plaintiff

v.

Google

Defendant

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)
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)
)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Google
1600 Amphitheater Parkway
Mountain View, California 94043
Phone (650) 643 -4000
Attn:Larry Page, CEO

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Amanda U. Ajuluchuku, Plaintiff
2810 Gateway Oaks Dr.
Sacramento, CA 95833
Phone (310) 228-7629
Email: amandaajuluchuku@yahoo.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk