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**SUMMONS  
(CITACION JUDICIAL)**

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:**

**(AVISO AL DEMANDADO):**

ALPHABET INC. A California Corporation; Google INC, a California Corporation; Youtube, Inc. a California Corporation and  
**YOU ARE BEING SUED BY PLAINTIFF:** *Does 1 through 50, inclusive*  
**(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

**Scott Douglas Redmond AN INDIVIDUAL AND  
MAJORITY OWNER OF LIMNIA INC.**

**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:  
(El nombre y dirección de la corte es):

San Francisco Superior Court, 400 McAllister St., SF, CA 94102

CASE NUMBER

(Número del Caso)

CGC 16-551805

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Limnia, Inc., 601 Van Ness Ave., # E3613, San Francisco, CA 94102

DATE: MAY 05 2016

(Fecha)

CLERK OF THE COURT

Clerk, by  
(Secretario)

Deputy  
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (Form POS-010) or LA VEGA NAVARRO, Rossaly  
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010))

**NOTICE TO THE PERSON SERVED:** You are served

- 1.  as an individual defendant.
- 2.  as the person sued under the fictitious name of (specify):

on behalf of (specify): *Google, Inc. y a California Corporation*

- under:  CCP 416.10 (corporation)  CCP 416.60 (minor)
- CCP 416.20 (defunct corporation)  CCP 416.70 (conservatee)
- CCP 416.40 (association or partnership)  CCP 416.90 (authorized person)
- other (specify):

- 4.  by personal delivery on (date):



1 Scott Douglas Redmond an individual and majority owner of  
2 Limnia, Inc.

3 Address: 601 Van Ness Avenue, MS E3613  
4 San Francisco, California 94102

6 Tel. No.: 510-868-2862

7 E-Mail: legal@ourgooglelawsuit.com

9 The Plaintiffs, In Pro Per: Case # CGC 16-551805

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

15 COUNTY OF SAN FRANCISCO

17 SCOTT DOUGLAS REDMOND AN )  
19 Individual AND MAJORITY OWNER OF )  
21 LIMNIA, INC. )

23 Plaintiffs,

25 vs.

27 ALPHABET INC., a California )  
31 Corporation, GOOGLE, INC, a )  
33 California Corporation, YOUTUBE, )  
35 INC., a California Corporation, and )  
37 DOES 1 through 50, Inclusive )

) San Francisco County Superior  
) Court Case No.

) COMPLAINT FOR INTENTIONAL  
) INTERFERENCE WITH  
) CONTRACTUAL RELATIONS;  
) INTENTIONAL INTERFERENCE  
) WITH PROSPECTIVE ECONOMIC  
) ADVANTAGE; CYBER-STALKING;  
) FRAUD; INVASION OF PRIVACY;  
) UNFAIR COMPETITION; THEFT OF  
) INTELLECTUAL PROPERTY

) JURY TRIAL DEMANDED

) Date:  
) Time:  
) Dept.:  
) Trial Date:

41  
43 The Plaintiffs, Scott Douglas Redmond: "INDIVIDUAL A", an individual  
45 whose name is published with the court but not placed in this document for personal safety,  
47 and Limnia, Inc. "COMPANY B", a California Corporation, whose name is published  
49 with the court but not placed in this document for personal safety, do hereby submit their  
51 Complaint for Intentional Interference with Contractual Relations, Intentional Interference  
53 with Prospective  
55



SCOTT DOUGLAS REDMOND AN  
Individual AND LIMNIA INC.  
Address: 601 Van Ness Avenue, MS E3613  
San Francisco, California 94102

Tel. No.: 510-868-2862  
E-Mail: legal@ourgooglelawsuit.com

The Plaintiffs, In Pro Per

ENDORSED  
FILED  
Superior Court of California  
County of San Francisco  
MAY 05 2016  
CLERK OF THE COURT  
BY: ROSSALY DE LA VEGA  
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO CGC 16-551805

SCOTT DOUGLAS REDMOND  
AN INDIVIDUAL )  
AND MAJORITY OWNER )  
OF LIMNIA INC. )  
Plaintiffs, )

San Francisco County Superior  
Court Case No.

COMPLAINT FOR INTENTIONAL  
INTERFERENCE WITH  
CONTRACTUAL RELATIONS;  
INTENTIONAL INTERFERENCE  
WITH PROSPECTIVE ECONOMIC  
ADVANTAGE; CYBER-STALKING;  
FRAUD; INVASION OF PRIVACY;  
UNFAIR COMPETITION; THEFT OF  
INTELLECTUAL PROPERTY

vs.

ALPHABET INC., a California  
Corporation; GOOGLE, INC, a  
California Corporation; YOUTUBE,  
INC., a California Corporation, and  
DOES 1 through 50, Inclusive

JURY TRIAL DEMANDED

Date:  
Time:  
Dept.:  
Trial Date:

SCOTT DOUGLAS REDMOND AS: *SR*  
The Plaintiffs, "INDIVIDUAL A", an individual whose name is published  
with the court but not placed in this document for personal safety, and "*LIMNIA, INC.*  
"COMPANY B", a  
California Corporation, whose name is published with the court but not placed in this  
document for personal safety, do hereby submit their Complaint for Intentional  
Interference with Contractual Relations, Intentional Interference with Prospective

1 Economic Advantage, Cyberstalking, Fraud, Invasion of Privacy, Unfair Competition and  
2 Theft of Intellectual Property and allege as follows:

3 GENERAL ALLEGATIONS

4 1. The Plaintiffs, INDIVIDUAL A [hereinafter referred to as the  
5 "INDIVIDUAL A"], is an individual residing in San Francisco, San Francisco County,  
6 California.

7 2. The Plaintiffs, COMPANY B, INC., [hereinafter referred to as  
8 "COMPANY B"], is a California corporation duly authorized to conduct business in the  
9 State of California and does, in fact, conduct business in the County of San Francisco,  
10 California.

11 3. The Defendant, ALPHABET, INC., [hereinafter referred to as  
12 "Alphabet"], is a California Corporation duly authorized to conduct business in the State of  
13 California and does, in fact, conduct business in the County of San Francisco, California.

14 4. The Defendant, GOOGLE, INC., [hereinafter referred to as  
15 "Google"], is a California Corporation duly authorized to conduct business in the State of  
16 California and does, in fact, conduct business in the County of San Francisco, California.

17 5. The Defendant, YOUTUBE, Inc. is a California Corporation duly  
18 authorized to conduct business in the State of California and does, in fact, conduct business  
19 in the County of San Francisco, California.

20 6. The true names and capacities of the Defendants, DOES 1 through  
21 50, inclusive, are presently unknown to the Plaintiffs at this time and the Plaintiffs sues  
22 those Defendants and each of them, by such fictitious names pursuant to the pertinent  
23 provisions of the California Code of Civil Procedure.

24 7. The Plaintiffs are informed and believe and, based on that  
25 information and belief, allege that some of the named Defendants herein and each of the  
26 parties designated as a "DOE" and every one of them, are legally responsible jointly and  
27 severally for the events and happenings referred to in the within Complaint for Intentional  
28

1 Interference with Contractual Relations, Intentional Interference with Prospective  
3 Economic Advantage, Cyberstalking, Fraud, Invasion of Privacy, Unfair Competition and  
5 Theft of Intellectual Property.

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

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

29 **STATEMENT OF FACTS**

31 10. In or about May 3, 2005, the Plaintiffs received, in recognition by  
33 the Congress of the United States in its Iraq War Bill, a commendation and federal grant  
35 issued jointly by the Congress of the United States and the United States Department of  
37 Energy in the amount of \$825,000.00 plus and including additional resources and access to  
39 federal resources, as and for the development of fuel cell and energy storage technology to  
41 be used in connection with the research and development of an electric car to be used by  
43 the Department of Defense and the American retail automotive market to create domestic  
45 jobs, enhance national security and provide a domestic energy solution derived entirely  
47 from domestic fuel sources. Plaintiffs had been invited into the program by U.S. Senate  
49 and Agency officials with the request that Plaintiffs "help their country in a time of need..".  
51  
53  
55

1           11.     Beginning in or about July of 2006, the Plaintiffs were contacted by,  
3 various individuals representing venture capital officers and investors employed by, and/or  
5 with, the Defendants. These individuals were agents of the Defendant, Google's,  
7 "RechargeIT" Project and Google partner, Tesla Motors. They also represented the Kleiner  
9 Perkins Group,<sup>1</sup> McKinsey Consulting, Deloitte Consulting, Khosla Ventures, In-Q-Tel and  
11 associated parties funded by and reporting to the Defendants, Alphabet and Google, and  
13 included Karim Faris, a Google "partner."<sup>2</sup>

15           12.     These investors feigned interest in emerging technology designed  
17 and developed by the Plaintiffs and requested further information from Plaintiffs. These  
19 investors informed the Plaintiffs that their interest was in purchasing the emerging  
21 technology from the Plaintiffs, investing in the venture, or structuring a form of joint  
23 venture with him.  
25

27           13     This was not the truth.

29  
31 \_\_\_\_\_  
33 <sup>1</sup> Now under federal investigation, a subject of the 60 Minutes "Cleantech Crash" segment, the  
35 founding investor of Google, the other core recipient of the Steven Chu DOE cash and a party  
37 mentioned by name in the federal anti-corruption lawsuits; XP Vs. DOE, et al..

39 <sup>2</sup> Per Google's description of Him: "Karim brings more than a decade of entrepreneurial and  
41 investment experience to their role. He joined Google's corporate development and politics team in  
43 2008, the group responsible for the company's investments and acquisitions, and joined Google  
45 Ventures in 2010. Prior to Google, Karim was a venture capitalist at Atlas Venture, where he  
47 worked on over a dozen investments in Internet infrastructure, digital media, and consumer  
49 services. Previously, he was Director of New Ventures at Level 3 Communications, responsible for  
51 evaluating new business opportunities and has led product development for the company's voice  
53 services. Earlier in his career, Karim held various product and marketing roles at Intel, initially on  
55 the i486, and later as product manager for the Pentium Processor. He started his career at Siemens  
as a software engineer working on the first vehicle navigation system for BMW. Karim holds an  
MBA from the Harvard Business School, an MS in Electrical Engineering from the University of  
Michigan, and a BS in Computer"

1           14.     The truth was that the Plaintiffs were contacted in efforts on behalf  
3 of the Defendants, so as to harvest confidential data and gather business intelligence and  
5 trade secrets for the purpose of copying the intellectual property and ideas of the Plaintiffs  
7 and interdicting Plaintiffs efforts, which Defendants found to be competitive, in a superior  
9 manner, to Defendants business. The Defendants agents and investors were simply on  
11 fishing expeditions while operating under the guise of proffered investment potential when,  
13 indeed, the Defendants had a covert plan to "*Cheat rather than compete*". Historical facts  
15 and public testimony have proven that Defendants had poor skills at innovation and  
17 invention and that Defendants regularly chose to steal technologies, from multiple parties,  
19 on an ongoing basis, rather than invent their own technologies. A simple search, by any  
21 one, on the other top non-Google search engines for the phrase: "*Google steals ideas*"  
23 brings up a remarkable set of documentation of an ongoing pattern of theft by Defendants.  
25 Plaintiffs have cooperated with federal investigators and journalists who are also  
27 investigating Defendants and who have legally shared some of the research, contained  
29 herein, with Plaintiffs.  
31

33           15.     In or about August 21 of 2009, just as the Plaintiffs were informed  
35 they were about to be awarded federal funding in amount over \$50 million, the Plaintiff's  
37 fuel cell and electric vehicle project was suddenly defunded and the same funds re-  
39 allocated to the Defendants, and to their various related entities, shell companies and  
41 projects.  
43

45           16.     In or about August of 2009, just as the Plaintiffs was informed they  
47 were about to be awarded over \$60 million federal funding for their energy storage  
49 technology, this project was similarly defunded and the same funds re-allocated to the  
51 Defendants, and to their various related entities, shell companies and projects.  
53  
55



1           17.     These funds, were ear-marked to be used by Defendants in a scheme  
3 designed for mining and exploiting non-domestic energy resources, (which eventually  
5 created a threat to U.S. domestic security by destabilizing other nations) via investment  
7 bank stock market mining commodities manipulations Defendants had arranged with their  
9 investment bankers, including Goldman Sachs. Until 2016, Plaintiffs were not aware that  
11 Defendants had placed their friends, employees and business associates in charge of the  
13 public agencies responsible for distributing these taxpayer funds. Indeed, the facts on  
15 public record and in breaking investigations and investigative journalism reports now  
17 prove that Defendants bought public policy influence with cash and internet services, much  
19 of that influence buying now found to have not been legally reported. The Defendants had  
21 their agents in California State and U.S. Federal offices distribute those funds to  
23 themselves while cutting out and sabotaging most all competing applicants. The  
25 Defendants, own a managing interest and control the source of these foreign mining  
27 resources and the supply chain for them.<sup>3 4</sup>

29           18.     In or about September 20, 2009, the Plaintiffs, were contacted by the  
31 Government Accountability Office of the United States with a request that they participate  
33  
35  
37

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39 <sup>3</sup> This control has been established by the Defendants, Google and Alphabet, through a series of  
41 series of sophisticated and complex relationships with electric vehicle companies including VVC,  
43 Tesla Motors, Driverless Car Project and other of the Plaintiffs's competitors as well as the  
45 numerous main-stream investigative journalism articles attached as Exhibits which provide proof  
47 that Defendants paid public officials billions of dollars of unreported cash and search services in  
49 exchange for market monopolies which harmed Plaintiff, among others.

51 <sup>4</sup> These are two of the numerous interceptions of public funding by the Defendants, Google and  
53 Alphabet, of funds originally allocated to the Plaintiffs. As with the other interceptions, the  
55 Plaintiffs subsequently suffered media and revenue attacks authored by and originating with the  
Defendants, Google and Alphabet, Inc. in a manner intended to ensure that the Plaintiffs enjoyed no  
public or governmental sympathy or remaining alternative for relief.

1 in an investigation being conducted by that entity into the business practices of the  
 3 Defendants, and their associates, pursuant to anti-trust allegations and allegations of  
 5 corruption.

7 19. In or about January 15, 2010, the Plaintiffs, did, in fact, provide live  
 9 testimony to, and receive information from, the Government Accountability Office of the  
 11 United States, the Department of Justice, Robert Gibbs ( who immediately thereafter quit  
 13 his job at The White House) and their staff at the White House Press Office, the  
 15 Washington Post White House Correspondent and other investigators.<sup>5</sup>

17 20.. The testimony provided by the Plaintiffs, was, in fact, truthful and  
 19 did, in fact, tend to support the veracity of the anti-trust allegations under investigation by  
 21 the Government Accountability Office and other federal and EU agencies.<sup>6</sup>

23 <sup>5</sup> The Plaintiffs has also provided multiple written and verbal reports to the FBI, via Mr. James  
 25 Comey and his staff at the Washington office, and Mr. David Johnson of the San Francisco office.  
 27 The FBI investigation of the related matters is described as “on-going.”

29 <sup>6</sup> The Defendants, Google and Alphabet, are charged with engaging in corruption of the Advanced  
 31 Technology Vehicles Manufacturing Loan (“ATVM”) and Section 1703 Loan Guarantee (“LG”) programs. In litigation: XP Vehicles, Inc. v. U.S. Dep’t of Energy, Case. No. 13-cv-00037, The  
 33 Court has directed “a good faith and unbiased reconsideration of” its contemplated renewed  
 35 funding applications. However, the Plaintiffs, COMPANY B, and most other applicants believe  
 37 and have filed a well-pleaded verified complaint — that their previous applications were subjected  
 39 to a biased, politically tainted, and otherwise unfair and corrupt review compromised by  
 41 Defendants. Renewal without proper oversight could be a fruitless exercise and could prejudice the  
 43 Plaintiffs, COMPANY B’s, legal rights. Applicants have now sought concrete assurances that the  
 45 applications will be reviewed fairly without the corrupting influence of the Defendants, Google and  
 47 Alphabet. Specifically, the applicants request the following: that any agency produce the  
 49 administrative record in order to ensure transparency. The Plaintiffs, COMPANY B, and others  
 51 have noted that the fees associated with LG and ATVM program applications are excessive and  
 53 burdensome. See, e.g., Am. Ver. Compl. ¶ 75; GAO, 2014 Annual Report: Additional Opportunities  
 55 to Reduce Fragmentation, Overlap, and Duplication and Achieve Other Financial Benefits, GAO-  
 14-343SP (April 2014), page 7 (stating that “most applicants and manufacturers we had spoken to  
 indicated that the costs of participating outweigh the benefits to their companies .....”); GAO,

1           21.     In or about June, 2010 and January, 2015 the Defendants, Alphabet  
3 and Google, exchanged funds with tabloid publications. As a result, those tabloid  
5 publications coincidentally published the only two articles and the only custom animated  
7 attack film including false, defamatory, misleading and manufactured information  
9

11  
13  
15 Department of Energy: New Loan Guarantee Program Should Complete Activities Necessary for  
17 Effective and Accountable Program Management, GAO-08-750 (July 2008) (reporting that the high  
19 application fees “may lead to biases in the projects that receive guarantees”). Nonetheless, DOE  
21 has actually raised at least one LG program application fee to \$50,000 and this is assumed, by  
23 some, on orders from Defendants to discriminate against applicants who are not part of the Silicon  
25 Valley business Cartel controlled by Defendants. See DOE, Title XVII Application Process,  
27 <http://energy.gov/node/988041/Fees> (last visiting Feb. 25, 2016). In the Plaintiffs, COMPANY B’s,  
29 first application, the U.S. Government waived the application fee as to the Plaintiffs, COMPANY B  
31 and other applicants. Am. Ver. Compl. ¶ 76. A precedent has been set and the U.S. Government  
33 should continue to honor its waiver of the Plaintiffs, COMPANY B’s, application fees in the  
35 renewed application and that the Department will consider COMPANY B’s ATVM renewed  
37 application as having satisfied “eligibility screening.” 10 C.F.R. § 611.103(a). The Plaintiffs,  
39 COMPANY B, alleges that the reviewers and decision-makers on the Plaintiffs, COMPANY B’s,  
41 original applications were tainted by political bias and controlled by the Defendants, Alphabet and  
43 Google. Am. Ver. Compl. ¶ 115-118. During oral argument on December 11, 2015, however,  
45 counsel for the government stated that “most, if not all, the senior level decision-makers that would  
47 be making a decision regarding these programs have “since departed the agency.” Transcript of  
49 Oral Argument, December 11, 2015, page 32. The Plaintiffs, COMPANY B, has asked for the U.S.  
51 Government to identify (1) all of the decision-makers, “senior level” and otherwise, who will be  
53 involved in making any decisions regarding the Plaintiffs, COMPANY B’s, applications along with  
55 their position at the agency and the date they began working at the agency and identify which, if  
any, were in the same position upon the Plaintiffs, COMPANY B’s, first review, and (2) all firms,  
advisors, and individuals, if any, the agency has hired, or intend to hire, that will perform any  
review or analysis of the Plaintiffs, COMPANY B’s, applications. The Plaintiffs has demanded that  
the relationship of each of those persons, to the Defendants, Alphabet and Google, be identified.  
The U.S. Government has enacted regulations and published manuals concerning its policies and

1 belittling the Plaintiffs, attacking them and discrediting their reputation as an inventor,  
3 project developer and project director.<sup>7</sup>

5 22. In or about January 20, 2011, the Plaintiffs, contacted Defendants,  
7 with written requests that it delete the false, defamatory, misleading and manufactured  
9 information belittling the Plaintiffs, attacking them and discrediting their reputation as an  
11 inventor, project developer and project director from its search engine servers.

13  
15 procedures for reviewing LG and ATVM applications. See, e.g., 10 CFR Part 609; 10 CFR Part  
17 611; DOE, Guidance For Applicants To The Advanced Technology Vehicles Manufacturing Loan  
Program (publically available at:

19 [http://www.energy.gov/sites/prod/files/2015/02/f19/ATVM\\_Guidance\\_for\\_Applicants\\_11.4.14.pdf](http://www.energy.gov/sites/prod/files/2015/02/f19/ATVM_Guidance_for_Applicants_11.4.14.pdf))

21 . However, the agency failed to follow those processes, and allowed corruption by the Defendants  
23 to taint the programs in reviewing applications. See, e.g., Am. Ver. Compl. ¶¶ 111, 114, 118; GAO,  
25 DOE Loan Guarantees: Further Actions Are Needed to Improve Tracking and Review of  
27 Applications, GAO-12-157 (March 2012); GAO, Department of Energy: New Loan Guarantee  
29 Program Should Complete Activities Necessary for Effective and Accountable Program  
31 Management, GAO-08-750 (July 2008) (stating that DOE “has not developed detailed policies and  
33 procedures, including roles and responsibilities and criteria that demonstrate how DOE plans to  
35 evaluate the applications”). For example, the agency is required to consult with the Department of  
37 the Treasury. See, e.g., 2 U.S.C. § 16512(a) (“the Secretary shall make guarantees under this or any  
39 other Act for projects on such terms and conditions as the Secretary determines, after consultation  
41 with the Secretary of the Treasury, only in accordance with this section”); see also DOE Final Rule,  
43 10 C.F.R. § 609.7 (requiring consultation with Treasury). The agency, however, has in many  
45 instances consulted with Treasury after making its decision. GAO, DOE Loan Guarantees: Further  
47 Actions Are Needed to Improve Tracking and Review of Applications, GAO-12-157 (March 2012),  
49 page 23 Table 5 (reporting that this step was sometimes skipped). In fact, these steps were skipped  
51 as to those who received loans in order to benefit Defendants and harm Plaintiffs in the initial  
53 application (cite). Comments by the agency’s counsel at this Court’s hearing add to the Plaintiffs,  
55 COMPANY B’s, concerns that the agency disregards its own procedural rules in order to benefit  
the Defendants, Alphabet and Google, and to harm the Plaintiffs for anti-trust, monopolistic and  
vindictive efforts by the Defendants, Alphabet and Google. See Transcript of Oral Argument,  
December 11, 2015, page 25 (“I’m not sure if there isn’t an ordinary process. ... [M]y  
understanding is that there isn’t a step one, you know, a set-down procedure that must be



1           23. The Plaintiffs had numerous lawyers, specialists and others  
3 contacted Google requesting a cessation of Google's harassment and internet manipulation  
5 and removal of the rigged attack links and hidden internet codes within the links on  
7 Google's server architecture.

9           24. At all times pertinent, the Plaintiffs, including Google staff  
11 members, Matt Cutts, Forest Timothy Hayes, Google legal staff and others refused to assist

13 \_\_\_\_\_  
15 followed."). The Plaintiffs, COMPANY B, has demanded that the U.S. Government clarify what  
17 procedures, review steps, and criteria the agency intends to follow in reviewing the Plaintiff,  
19 COMPANY B's, renewed applications that will assure the Plaintiffs that no further corruption will  
21 taint the process. LG and ATVM program applications have been reviewed by individuals who lack  
23 sufficient engineering expertise to do so and are beholden to illegally skew decisions to the  
25 Defendants, Alphabet and Google. See, e.g., Am. Ver. Compl. ¶¶ 86 (ECF No. 26); and GAO,  
27 Advanced Technology Vehicle Loan Program Implementation In Under Way, but Enhanced  
29 Technical Oversight and Performance Measures Are Needed, GAO-11-145 (Feb. 2011). Here, the  
31 agency initially denied the Plaintiff, COMPANY B's, ATVM application under the erroneous  
33 premise that its product was not designed to be used in an automotive vehicle when, in fact, the  
35 product was exclusively designed for automobiles and was recognized as such by the world's media  
37 and the largest set of customer orders and customer letters of support for the product for their  
39 "AUTOMOBILES". Am. Ver. Compl. Exs. 7 & 9. Plaintiffs's company, other state and federal  
41 regulatory agencies, the voting public, and news investigators have demanded that the DOE specify  
43 which of the individuals who will evaluate the Plaintiffs, COMPANY B's, applications are trained  
45 as engineers, the nature of their qualifications and their relationship to Defendants or any other  
47 competing entity. As of the date of this filing, thousands of news reports and televised news  
49 programs have accused Defendants of economic and corruption crimes relative to Government  
51 funding programs.  
53  
55

1 and commonly replied: "...just sue us..", "...get a subpoena...", etc., even though the  
3 Plaintiffs, and the Plaintiff's representatives, provided the Defendants with extensive  
5 volumes of third-party proof clearly demonstrating that not a single statement in the attack  
7 links promoted by google was accurate or even remotely true.

9 25. In, or about, February 20, 2011, YouTube, published a custom  
11 produced and targeted attack video that also included false, defamatory, misleading and  
13 manufactured information belittling the Plaintiffs, and discrediting their reputation as an  
15 inventor, project developer and project director. The video is believed to have been  
17 produced by Defendants as part of their anti-trust attack program against Plaintiffs.

19 26. In or about February 25, 2011 the Plaintiffs contacted the  
21 Defendants, YouTube and Google, with many written requests that they delete the false,  
23 defamatory, misleading and manufactured information belittling the Plaintiffs, attacking  
25 them and discrediting their reputation as an inventor, project developer and project director  
27 from its website. [See, Sample responses of the Defendants Google and YouTube, attached  
29 as Exhibits and incorporated herein by reference.]  
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51 <sup>7</sup> Defendants is known to have provided tens of millions of dollars to this tabloid chain per Defendants financial staff,  
53 SEC filings and disclosures in other legal cases.  
55

1           27. All of the written demands of the Plaintiffs were to no avail and  
3 none of the Defendants, agreed to edit, delete, retract or modify any of the false,  
5 defamatory, misleading and manufactured information belittling the Plaintiffs, attacking  
7 them and discrediting their reputation as an inventor, product developer and project  
9 director from their websites and digital internet and media platforms and architecture.

11           28. The Plaintiffs, whose multiple businesses ventures had already  
13 suffered significant damage as the result of the online attacks of the Defendants, contacted  
15 renowned experts, and especially Search Engine Optimization and forensic internet  
17 technology (IT) experts, to clear and clean the internet of the false, defamatory, misleading  
19 and manufactured information belittling the Plaintiffs, attacking them and discrediting their  
21 reputation as an inventor, product developer and project director from their websites.

23           29. None of the technology experts hired by the Plaintiffs, at substantial  
25 expense, were successful in their attempts to clear, manage or even modify the false,  
27 defamatory, misleading and manufactured information belittling the Plaintiffs, attacking  
29 him and discrediting their reputation as an inventor, product developer and project director  
31 which only Google, the controlling entity of the internet, refused to remove. In fact, those  
33 experts were able to even more deeply confirm, via technical forensic internet analysis and  
35 criminology technology examination techniques that Google was rigging internet search  
37 results for its own purposes and anti-trust goals.

39           30. All efforts, including efforts to suppress or de-rank the results of a  
41 name search for "Plaintiffs" failed, and even though tests on other brands and names, for  
43 other unrelated parties did achieve balance, the SEO and IT tests clearly proved that  
45 Google was consciously, manually, maliciously and intentionally rigging its search engine  
47 and adjacent results in order to "mood manipulate" an attack on Plaintiffs.  
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1           31. In fact, the experts and all of them, instead, informed the Plaintiffs,  
3 that, not only had Google locked the false, defamatory, misleading and manufactured  
5 information belittling the Plaintiffs, attacking them and discrediting their reputation as an  
7 inventor, project developer and project director into its search engine so that the  
9 information could never be cleared, managed or even modified, Google had assigned the  
11 false, defamatory, misleading and manufactured information belittling the Plaintiffs,  
13 attacking them and discrediting their reputation as an inventor, project developer and  
15 project director “PR8” algorithmic internet search engine coding embedded in the internet  
17 information-set programmed into Google's internet architecture. [See, Information  
19 received from one of over 30 IT, forensic network investigators and forensic SEO test  
21 analysts, a true and correct copy of which is attached hereto in the Exhibits.] Plaintiffs  
23 even went to the effort of placing nearly a thousand forensic test servers around the globe  
25 in order to monitor and metricize the manipulations of search results of examples of the  
27 Plaintiffs name in comparison to the manipulations for PR hype for Defendants financial  
29 partners, for example: the occurrence of the phrase “Elon Musk”, Defendants business  
31 partner and beneficiary, over a five year period. The EU, China, Russia, and numerous  
33 research groups (ie: [http://www.politico.com/magazine/story/2015/08/how-google-could-](http://www.politico.com/magazine/story/2015/08/how-google-could-rig-the-2016-election-121548)  
35 [rig-the-2016-election-121548](http://www.politico.com/magazine/story/2015/08/how-google-could-rig-the-2016-election-121548) By Robert Epstein ) have validated these forensic studies  
37 of Google's architect-ed character assassination and partner hype system .  
39

41  
43           32. The “PR8” codes are hidden codes within the Google software and  
45 internet architecture which profess to state that a link is a “fact” or is an authoritative  
47 factual document in Google's opinion. By placing “PR8” codes in the defamatory links  
49 that Google was manipulating about plaintiffs, Google was seeking to tell the world that  
51 the links pointed to “Facts” and not “Opinions”. Google embedded many covert codes in  
53  
55



1 their architecture which marketing the material in the attack links and video as "facts"  
3 according to Google.

5 33. The "PR8" codes are a set of codes assigned and programmed into  
7 the internet, by the Google to matters it designates as dependable and true, thereby  
9 attributing primary status as the most significant and important link to be viewed by online  
11 researchers regarding the subject of their search.<sup>9</sup> Google was fully aware that all of the  
13 information in the attack articles against Plaintiffs was false, Google promoted these  
15 attacks as vindictive vendetta-like retribution against Plaintiffs.

17 34. At all times pertinent from January 1, 2006, to in or about  
19 November 20, 2015, Google maintained it had no subjective control or input into the  
21 rankings of links obtained by online researchers as the result of a search on its search  
23 engines and that its search engine algorithms and the functions of its media assets were  
25 entirely "arbitrary" according to the owners and founders of Google.  
27

29 35. In or about April 15, 2015, The European Union Commission  
31 took direct aim at Google Inc., charging the Internet-search giant with skewing and rigging  
33 search engine results in order to damage those who competed with Google's business and  
35 ideological interests.

37 36. In those proceedings, although Google continued to maintain that it  
39 has no subjective control or input into the rankings of links obtained by online researchers  
41 as the result of a search on its search engines and that its staff had no ability to reset, target,  
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45 <sup>9</sup> Google has a variety of such hidden codes and has various internal names for such codes besides,  
47 and in addition to, "PR8". Google has been proven to use these fact vs. fiction rankings to affect  
49 elections, competitors rankings, ie: removing the company: NEXTAG from competing with Google  
51 on-line; or removing political candidates from superior internet exposure and it is believed by  
53 investigators and journalists, that Defendants are being protected from criminal prosecution by  
55 public officials who Defendants have compensated with un-reported campaign funding.

1 mood manipulate, arrange adjacent text or links, up-rank, down-rank or otherwise engage  
3 in human input which would change algorithm, search results, perceptions or subliminal  
5 perspectives of consumers, voters, or any other class of users of the world wide web, also  
7 known as The Internet, the court, in accord with evidence submitted, determined that  
9 Google, does in fact have and does in fact exercise, subjective control over the results of  
11 information revealed by searches on its search engine.<sup>9</sup>

13 37. As a result of receiving this information, the Plaintiffs became  
15 convinced of the strength and veracity of their original opinion that the Defendants, had, in  
17 fact posted the false, defamatory, misleading and manufactured information belittling the  
19 Plaintiffs, attacking them and discrediting Plaintiffs reputation as inventor, project  
21 developer and project designer had been intentionally designed, published, orchestrated  
23 and posted by them in retaliation to the true testimony provided by the Plaintiffs, to the  
25 Government Office of Accountability of the United States in May of 2005, and to the  
27 Securities and Exchange Commission, The Federal Bureau of Investigation, The United  
29 States Senate Ethics Committee and other investigating parties, and had been disseminated  
31 maliciously and intentionally by them in an effort to do damage to their reputation and to  
33 their business prospects and to cause him severe and irremediable emotional distress.  
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41  
43 <sup>9</sup> The EU case, and subsequent other cases, have demonstrated that Google sells such manipulations to large clients in  
45 order to target their enemies or competitors or raise those clients subliminal public impressions against competitors or  
47 competing political candidates. In fact, scientific study has shown that although Google claims to "update its search  
49 engine results and rankings, sometimes many times a day", the attack links and codes against Plaintiffs have not moved  
51 from the top lines of the front page of Google for over FIVE YEARS. If Google were telling the truth, the links would  
53 have, at least, moved around a bit or disappeared entirely since hundreds of positive news about Plaintiffs was on every  
55 other search engine EXCEPT Google. Many other lawsuits have now shown that Google locks attacks against its enemies  
and competitors in devastating locations on the Internet. The entire nations of China, Russia, Spain and many more, along  
with the European Union have confirmed the existence and operation of Google's "attack machine".

1           38. In fact, the Plaintiffs, has suffered significant and irremediable  
3 damage to their reputation and to their financial and business interests. As a natural result  
5 of this damage, as intended by the Defendants, Gawker, Google and Youtube, the Plaintiffs  
7 has also suffered severe and irremediable emotional distress.

9           <sup>10</sup> 39. To this day, despite the age of the false, defamatory, misleading and  
11 manufactured information belittling the Plaintiffs, attacking him and discrediting their  
13 reputation as an inventor, project developer and project director, in the event any online  
15 researcher searches for information regarding the Plaintiffs, the same information appears  
17 at the top of any list of resulting links.

19           40. In addition, due to their control of all major internet database  
21 interfaces, Defendants have helped to load negative information about Plaintiffs on every  
23 major HR and employment database that Plaintiffs might be searched on, thus denying  
25 Plaintiffs all reasonable rights to income around the globe by linking every internal job,  
27 hiring, recruiter, employment, consulting, contracting or other revenue engagement  
29 opportunity for Plaintiffs back to false "red flag" or negative false background data which  
31 is designed to prevent Plaintiffs from future income in retribution for Plaintiffs assistance  
33 to federal investigators.<sup>11</sup>

35  
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39  
41 <sup>10</sup> As a party, attacked in a similar "hit job" media attack describes it: "*Gawker sets up the ball and Google kicks it down*  
43 *the field...over and over, until the end of time*". The recent Hulk Hogan, and other lawsuits, against Gawker Media has  
45 clearly demonstrated that Google and Gawker run "hit jobs" against adversaries of themselves and their clients.

47 <sup>11</sup> Major public figures and organizations, including the entire European Union, have also accused Defendants of similar  
49 internet manipulation by Defendants. The attacks, by Defendants, continue to this day. In 2016, the renowned Netflix  
51 series: "House of Cards" opened its sixth season with a carefully held script-surprise researched by the script factuality  
53 investigators for the production company of "House of Cards." The surprise featured Google, fictionally named  
55 "PollyHop," and described, in detail, each of the tactics that Google uses to attack individuals that Google's owners have  
competitive issues with. The Plaintiffs maintains that each and every tactic included in the televised example were tactics  
actually used to attack the Plaintiffs, his intellectual properties, his peers and his associates as threatening competitors.

1           41.     It should be noted here that, in 2016, one of the companies Plaintiffs  
3 was associated with, in cooperation with federal investigations, won a federal anti-  
5 corruption lawsuit against the U.S. Department of Energy in which a number of major  
7 public officials were forced to resign under corruption charges, federal laws and new legal  
9 precedents benefiting the public were created, and Google and its associates and related  
11 entities found culpable of corruption.

13                                   **First Cause of Action**  
15                   **INTENTIONAL INTERFERENCE WITH CONTRACTUAL RELATIONS**

17                                   **[Against the Defendants and DOES 1 through 50, inclusive]**

19           42.     The Plaintiffs hereby incorporate by reference the allegations set  
21 forth in paragraphs 1 through 42 inclusive as though fully set forth herein.

23           43.     On or about May 3, 2005, the Plaintiffs, received, in recognition by  
25 the United States Congress in the Iraq War Bill, a Congressional commendation and grant  
27 issued by the United States Congress and the United States Department of Energy in the  
29 amount of \$825,000.00, plus additional access to resources as, and for, the development of  
31 a domestic energy fuel cell and energy storage technology to be used in connection with  
33 the research and development of an electric car to be used by the Department of Defense  
35 and the American retail automotive market in order to create domestic jobs, enhance  
37 national security and provide a domestic energy solution derived from entirely domestic  
39 fuel sources.  
41  
43  
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47           44.     Defendants knew of the above described contractual relationship  
49 existing between the Plaintiffs and COMPANY B and the United States Department of  
51 Energy, in that the grant was made public record and, at the request of representatives of  
53 the Venture Capital group of the Defendants, the Plaintiffs believing that the request for  
55



1 information was as to providing additional funding for the project, did, in fact, submit  
3 complete information regarding the subject of the grant to Google agents upon their  
5 request.

7           45. Defendants, who had, and have, personal, stock-ownership,  
9 revolving-door career and business relationships with executive decision-makers at the  
11 United States Department of Energy and other Federal and State officials, lobbied and  
13 service-compensated those executive decision-makers to cancel, interfere and otherwise  
15 disrupt the grant in favor of the Plaintiffs, with the intention of terminating the funding in  
17 favor of the Plaintiffs and COMPANY B and applying the information they pirated from  
19 the Plaintiffs, for their own benefit as well as terminating the Plaintiff's competing efforts,  
21 which third party industry analysts felt could obsolete Defendants products via superior  
23 technology.  
25  
27

29           46. Individuals approached Plaintiffs offering to "help" the Plaintiffs get  
31 their ventures funded or managed. Those individuals were later found to have been  
33 working for Kleiner Perkin's, the founding investor and current share-holder of Google.  
35 The Plaintiffs discovered that those "helpful" individuals were helping to sabotage  
37 development efforts and pass intelligence to Google for its own use and applications.  
39

41           47. Accordingly, Google was successful in its efforts and, in or about  
43 August of 2009, the grant and other funding programs in favor of the Plaintiffs, was  
45 summarily canceled and re-directed to Defendants and their holdings.  
47

49           48. Commencing in or about 2008, Google commenced to take credit  
51 for advancement in its own energy storage and internet media technology, as based on the  
53 information it had pirated from the Plaintiffs.  
55



1 Google in its own vehicle, energy and internet media technology and about Google's theft  
3 of this property.

5 55. In order to put a stop to the Plaintiffs and in an effort to discredit  
7 Plaintiffs, divest Plaintiffs of contacts in the industry and also of financial backing, Google  
9 enlisted the services of the Defendants, YouTube and Gawker and also Google's own wide  
11 array of media and branding manipulation tools which are service offerings of Google.

13 56. In 2011, Gawker published a contrived "hatchet job" article  
15 describing the Plaintiffs as a scam artist and a scammers.

17 57. In 2011, Defendants YouTube posted a video which depicted the  
19 Plaintiffs as a cartoon character who attempts to engage in unethical behavior. The video  
21 employs Plaintiff's personal name and personal information.

23 58. Google has paid tens of millions of dollars to Gawker Media and has  
25 a business and political relationship with Gawker Media according to financial filings,  
27 other lawsuit evidence, federal investigators and ex-employees.

29 59. Also as intended by Google, this damage, especially because the  
31 false representations become immediately apparent to anyone conducting an internet  
33 search for the "Plaintiffs," have caused investors to shy away from the Plaintiffs, causing  
35 the Plaintiffs further difficulty in obtaining funding from in, or about, 2011 to the present  
37 time.

39 60. Google has also placed on human resources and and job hiring  
41 databases negative and damaging red flags about the Plaintiffs, relative to the Gawker and  
43 Google attacks. These postings were intended by Google to prevent the Plaintiffs, not only  
45 from working for himself, but also from working for other, noteworthy individuals of good  
47 repute.

49 61. Additionally, Google representatives sent a copy of the Gawker  
51 attack article to an employer of the Plaintiffs via their human resources office and asked  
53 this employer, "You don't want him working for you with this kind of article out there, do  
55

1 you?" This resulted in the Plaintiff's immediate termination because of that article.  
3 Plaintiff has recovered documents between Defendants showing the preplanned and  
5 premeditated deployment of this attack. As documented in one of the Hulk Hogan cases  
7 against Defendants associates: *"As evidence, the lawsuit points to a Gawker article by its*  
9 *founder, Nick Denton, that predicted Mr. Bollea's "real secret" would be revealed — it was*  
11 *posted soon before The Enquirer report — and a 14-minute gap between the publication of*  
13 *the article and a Gawker editor, Albert J. Daulerio, tweeting about it. "Based upon the*  
15 *timing and content of Daulerio's tweet, Daulerio was aware, in advance, of The Enquirer's*  
17 *plans to publish the court-protected confidential transcript," the lawsuit argues..."*

21 Plaintiffs in this case also have the same form of evidence from the same parties.

23 62. As a proximate result of the conduct of the Defendants, the Plaintiffs  
25 and COMPANY B have suffered severe financial damage and, accordingly, loss of their  
27 good will and reputation.  
29

31 63. Plaintiffs are informed by investigators and Defendants' own former  
33 staff that Google planned an effort to "take him down" in retribution for effectively  
35 competing with Google and for co-operating with law enforcement and regulatory  
37 investigations of Defendants.  
39

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

### 45 Third Cause of Action

#### 47 CYBERSTALKING

49  
51 [Against the Defendants and DOES 1 through 50, inclusive]

53 65. The Plaintiffs hereby incorporate by reference the allegations set  
55 forth in paragraphs 1 through this paragraph inclusive as though fully set forth herein.

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

9           67. By refusing to remove the offending publication and, in fact,  
11 assigning it a value associated with “truth”, “factuality” and a position in its web browser  
13 that came up and still comes up the first and most prominent link pursuant to any search  
15 for the Plaintiffs and maintaining this link for the past 5 years as globally marketed, public,  
17 published, permanent, un-editable and unmovable, Google intended, and continues to  
19 intend to harass the Plaintiffs.  
21

23           68. By doing the things described in paragraphs 67 and 68 above,  
25 Google, did and does continue to intend to cause the Plaintiffs substantial emotional  
27 distress.  
29

31           69. The Plaintiffs, commencing in or about their discovery of the post  
33 and the link, has experienced and continues to experience substantial emotional distress.  
35

37           70. Google engaged in the pattern of conduct described above with the  
39 intent to place the Plaintiffs in reasonable fear for their safety or in reckless disregard for  
41 the safety of the Plaintiffs.

43           71. The Plaintiffs admit here that Plaintiffs knew of a number of Bay  
45 Area technologists including Gary D. Conley, Rajeev Motwani who also had strange run-  
47 ins with Defendants and who subsequently suffered strange terminations per investigators  
49 and media who continue, at the request of the families and friends of those individuals, and  
51 others, to examine those cases. This has caused concern and stress for Plaintiffs. While  
53  
55



1 Defendants did not necessarily have the intent to do physical harm to the Plaintiffs, by  
3 arranging for publication of the subject article, ensuring the subject article could not be  
5 moved or altered and would be certain to appear first and permanently as the result of any  
7 search for the Plaintiffs, intended to do significant damage to Plaintiff's financial interests  
9 in retaliation for their testimony at the proceedings described above and also intended to  
11 ensure the Plaintiffs would have no future as a competitor in the industry of technology  
13 populated by the Plaintiffs and by the Defendants.  
15

17           72. Defendants chose to cheat rather than compete and decided, as a  
19 whole to plan, operate and deploy "hit jobs", defamation attacks, media hatchet jobs,  
21 character assassinations, venture capitol black-lists, technology hiring no-poaching  
23 blacklists, public officials influence buying and other illicit tactics against Plaintiffs, public  
25 officials, journalists, ex-employees, political candidates and others, as retribution,  
27 vengeance and vendetta tactics.  
29

31           73. The results of any search for the Plaintiffs on Google's search  
33 engine are attached hereto in the Exhibits and incorporated herein by reference. These  
35 same results have remained consistently in place and unmovable and un-editable since  
37 April 3, 2011.  
39

41           74. In 2011, and through 2015, the Plaintiffs did contact Google with  
43 written requests to remove the offending content. [See, Correspondence, a true and correct  
45 copy of which is attached hereto as Exhibits and incorporated herein by reference.] In  
47 response, Google consistently stated it has no control over the results of any search on its  
49 search engine or the operation of its technology or its algorithm and, accordingly, refused  
51 to remove the results or cease the harassment.  
53  
55



1 GOOGLE does in fact have such ability and does, in fact, exercise this ability regularly to  
3 manipulate and manage any of the results of any search on its engine.

5 81. On or about early 2011, defendants made the following  
7 representation(s) to the Plaintiffs: They stated that Google had no control over the public  
9 experience of its products, page ranking and link presentation and that all results were  
11 arbitrary and a matter of luck.  
13

15 82. The representations made by the defendant were in fact false. The true  
17 facts are that Google owners and executives can freely, consciously and manually rig,  
19 manipulate, modify, mood emphasize, re-rank, hide, adjust psychological adjacency  
21 perceptions of above-and-below text, delete or otherwise affect the local, regional, national  
23 and global perceptions of the public overall, or any market segment, or demographic, at  
25 will, in precise, controlled and monitored manipulations and that Google has even sold  
27 these manipulations-as-a-service to private clients.  
29  
31

33 83. When the defendant made these representations, he/she/it knew them  
35 to be false and made these representations with the intention to deceive and defraud the  
37 Plaintiffs and to induce the Plaintiffs to act in reliance on these representations in the  
39 manner hereafter alleged, or with the expectation that the Plaintiffs would so act.  
41

43 84. The Plaintiffs, at the time these representations were made by the  
45 defendant and at the time the Plaintiffs took the actions herein alleged, was ignorant of the  
47 falsity of the defendant's representations and believed them to be true. In reliance on these  
49 representations, the Plaintiffs was induced to and did delay their attempts to have Google  
51 cease their abuse of Plaintiffs by technical means. Had the Plaintiffs known the actual  
53 facts, he/she would not have taken such action. The Plaintiff's reliance on the defendant's  
55

1 representations was justified because Defendants stated that they represented government  
3 interests and because FTC and SEC investigation manipulations, by Defendants, had not  
5 yet been fully exposed in the news media.

7  
9 85. As a proximate result of the fraudulent conduct of the defendant(s) as  
11 herein alleged, the Plaintiffs was induced to expend hundreds of hours of their/her time  
13 and energy in an attempt to derive a profit from their ventures which were covertly under  
15 attack by defendant(s) but has received no profit or other compensation for their/her time  
17 and energy], by reason of which the Plaintiffs has been damaged in the sum of at least two  
19 billion dollars based on the minimum reported amounts by which Defendants profited at  
21 Plaintiffs expense and the paths of direction which Plaintiffs were steered to by Defendants  
23 fraudulent misrepresentations.  
25

27  
29 86. The aforementioned conduct of the defendant(s) was an intentional  
31 misrepresentation, deceit, or concealment of a material fact known to the defendant(s) with  
33 the intention on the part of the defendant(s) of thereby depriving the Plaintiffs of property  
35 or legal rights or otherwise causing injury, and was despicable conduct that subjected the  
37 Plaintiffs to a cruel and unjust hardship in conscious disregard of the Plaintiff's rights, so as  
39 to justify an award of exemplary and punitive damages.  
41

43 **Fifth Cause of Action**  
45 **INVASION OF PRIVACY**  
47

49 **[Against the Defendants and DOES 1 through 50, inclusive]**

51 87. The Plaintiffs hereby incorporate by reference the allegations set  
53 forth in paragraphs 1 through this paragraph inclusive as though fully set forth herein.  
55

1           88. The Defendant, GOOGLE, first by arranging for and  
3 allowing/posting the gawker article, then by coding a link to the article that permanently  
5 placed the article at the top of any search results for the Plaintiffs, INDIVIDUAL A, has  
7 invaded the inalienable privacy rights of the Plaintiffs, INDIVIDUAL A as protected by  
9 Article I section 1 of the Constitution of the State of California and violated the human  
11 right known as “the right to be forgotten”, now overtly supported in other nations.  
13

15           89. The intrusion commenced in or about April of 2011 and continues to  
17 this day, is significant and remains unjustified by any legitimate countervailing interest of  
19 the Defendant, GOOGLE.  
21

23           90. For five years, when any member of the public searches on the  
25 Defendant GOOGLE’s search engine, for the Plaintiffs, INDIVIDUAL A, the first link to  
27 pop up refers to the Plaintiffs, INDIVIDUAL A as a scam artist.  
29

31           91. The pervasiveness and longevity of this link plus its placement at the  
33 very top of any search result has resulted in a significant, albeit intentional interference  
35 with the right of the Plaintiffs INDIVIDUAL A to engage in and conduct personal and  
37 business activities, to enjoy and defend life and liberty, acquiring possessing and protecting  
39 property and pursuing and obtaining safety, happiness and privacy.  
41

43           92. The facts disclosed about Plaintiffs were and remain false. Even in the event  
45 the Gawker article might have at one time garnered protection by the First Amendment as  
47 opinion regarding a public controversy and about a semi-public figure, no further  
49 controversy exists or even could.  
51  
53  
55



1           93. Five years have passed and, despite the lack of current content  
3 of controversy, the Plaintiffs, INDIVIDUAL A remains saddled with a personal, permanent  
5 and immovable reference on the internet that characterizes him as scam artist in the world  
7 of internet technology.

9           94. The Plaintiffs INDIVIDUAL A has done the best he could in  
11 these years to move on with new projects and new investors. He has made every effort to  
13 start anew and has been precluded from doing so by the gawker article.

17           95. Maintenance of the original posting of April 2011 for five  
19 years is offensive and objectionable to the Plaintiffs INDIVIDUAL A and certainly would  
21 be to a reasonable person of ordinary sensibilities in that the original posting is false and  
23 defamatory and was intentionally arranged for by GOOGLE so as to do significant damage  
25 to the personal and professional reputation of the Plaintiffs, INDIVIDUAL A, because it  
27 has accomplished this damage, because there is no manner other than at the Defendant  
29 GOOGLE's hand by which the link can be altered or removed or the search results edited  
31 or limited and because there exists no reason that the Plaintiffs INDIVIDUAL A should not  
33 be allowed to enjoy a right to move on with is life independent of a label that had no basis  
35 in truth and reality in the first place.

41           96. The facts regarding the character of the Plaintiffs, INDIVIDUAL  
43 A, included in the gawker article are certainly no longer of any legitimate public concern  
45 nor are they newsworthy nor are they tied to any current controversy or dialogue.

49           97. IN FACT, THE Plaintiffs, can truly no longer be considered a  
51 public figure or even a semi-public figure as the GAWKER article has fairly successfully  
53 put him out of business and kept him out of business for the past five or more years.  
55

1                   98. As a proximate result of the above disclosure, Plaintiffs lost  
3 investors, contracts, was scorned and abandoned by their/her friends and family, exposed  
5 to contempt and ridicule, and suffered loss of reputation and standing in the community, all  
7 of which caused them/him/her humiliation, embarrassment, hurt feelings, mental anguish,  
9 and suffering], all to their/her general damage in an amount according to proof.  
11

13                   99. As a further proximate result of the above-mentioned  
15 disclosure, Plaintiffs suffered special damages to the brand, financing, reputation and  
17 market timeframe opportunities for their/her business, in that they lost funding, market  
19 share, federal contracts and other income, to their special damage in an amount according  
21 to proof.  
23

25                   100. In making the disclosure described above, defendant was  
27 guilty of oppression, fraud, or malice, in that defendant made the disclosure with (the  
29 intent to vex, injure, or annoy Plaintiffs or a willful and conscious disregard of Plaintiff's  
31 rights. Plaintiffs therefore also seeks an award of punitive damages.  
33

35                   101. Defendant has threatened to continue disclosing the above  
37 information. Unless and until enjoined and restrained by order of this court, defendant's  
39 continued publication will cause Plaintiffs great and irreparable injury in that Plaintiffs will  
41 suffer continued humiliation, embarrassment, hurt feelings, and mental anguish. Plaintiffs  
43 has no adequate remedy at law for the injuries being suffered in that a judgment for  
45 monetary damages will not end the invasion of Plaintiff's privacy.  
47

49                   **Sixth Cause of Action**

51                   **UNFAIR COMPETITION – CLASS ACTION**

53                   **[Against the Defendants and DOES 1 through 50, inclusive]**  
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1                   102. The Plaintiffs hereby incorporate by reference the allegations  
3 set forth in paragraphs 1 through this paragraph inclusive as though fully set forth herein.

5                   103. The Plaintiffs brings this action on their own behalf and on  
7 behalf of all persons similarly situated. The class that the Plaintiffs INDIVIDUAL A  
9 represents is composed of all persons who, at any time since the date four years before the  
11 filing of this complaint, sought to have offensive, irrelevant and outdated material posted  
13 to the internet and available through a search on the Defendant, GOOGLE's search engine  
15 corrected, removed or re-ranked and have been informed by the Defendant, GOOGLE that  
17 the Defendant GOOGLE does not have the ability to do so and that Google falsely states  
19 this assertion in Google's published policy.  
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23                   104. The persons in the class are so numerous, an estimated 39%  
25 of the population of the United States of America, that the joinder of all such persons is  
27 impracticable and that the disposition of their claims in a class action is a benefit to the  
29 parties and to the court.  
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33                   105. There is a well-defined community of interest in the  
35 questions of law and fact involved affecting the parties to be represented in that each  
37 member of the class is or has been in the same factual circumstances, hereinafter alleged,  
39 as the Plaintiffs . Proof of a common or single state of facts will establish the right of each  
41 member of the class to recover. The claims of the Plaintiffs are typical of those of the class  
43 and the Plaintiffs will fairly and adequately represent the interests of the class.  
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47                   106. There is no plain, speedy, or adequate remedy other than by  
49 maintenance of this class action because the Plaintiffs is informed and believes that each  
51 class member is entitled to restitution of a relatively small amount of money, amounting at  
53 most to \$5,000.00 each, making it economically infeasible to pursue remedies other than a  
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1 class action. Consequently, there would be a failure of justice but for the maintenance of  
3 the present class action.

5 107. The Defendant GOOGLE INC is a business incorporated in  
7 the State of California and at all times herein mentioned owned and operated a its search  
9 engine and its ancillary commercial enterprises from its headquarters in Mountain View  
11 California.

13 108. In early 2011, GAWKER, a well-known internet libel and  
15 slander processing tabloid published an article about the Plaintiffs. The article falsely,  
17 maliciously and without regard for the truth, labeled the Plaintiffs, a scam artist.

19 109. Any search on the Defendant, GOOGLE's search engine for  
21 "INDIVIDUAL A" resulted and to this day still results in a display of the GAWKER article  
23 with the Plaintiffs described as a scammer in the first line of the GOOGLE link.

25 110. Publication of the article by GAWKER and the linking by  
27 GOOGLE caused the Plaintiffs immediate and irreparable harm to their reputation, to their  
29 business interests and to their personal life.

31 111. Some five years have passed and the Plaintiffs,  
33 INDIVIDUAL A, continues to suffer damage to their reputation to their business interests  
35 and to their personal life as the result of the publication by GAWKER and GOOGLES link  
37 to it.

39 112. In or about early 2011, the Plaintiffs directed a written  
41 request to the Defendant GOOGLE Inc to unlink the GAWKER publication to any search  
43 for their name or to delete the offending article.

45 113. The Defendant, GOOGLE, responded by stating that it had  
47 no ability or legal obligation to do so as the request didn't fall within its own policies for  
49 removal.

51 114. The position of the Defendant, GOOGLE is illegal, false and  
53 unfair.  
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1 115. The position of the Defendant is illegal as  
3 it infringes on the rights of individuals as protected by the Constitution of the State of  
5 California which protects the rights and freedoms of individuals to: "All people are by  
7 nature free and independent and have inalienable rights. Among these are enjoying and  
9 defending life and liberty, acquiring, possessing, and protecting property, and pursuing and  
11 obtaining safety, happiness, and privacy." per the State Constitution.  
13

15 116. The position of the Defendant is unfair as it deprives  
17 individuals of rights protected by the Constitution of the State of California which protects  
19 the rights and freedoms of individuals to: "All people are by nature free and independent  
21 and have inalienable rights. Among these are enjoying and defending life and liberty,  
23 acquiring, possessing, and protecting property, and pursuing and obtaining safety,  
25 happiness, and privacy."  
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29 117. The position of the Defendant, GOOGLE, is false  
31 because, as a processor of personal information and a controller of that information, the  
33 Defendant, GOOGLE also possesses the technical, logistical and government official  
35 manipulation power and ability to delete, re-rank and mood manipulate any information  
37 obtained as the result of a search on its search engine.  
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41 118. As a direct, proximate, and foreseeable result  
43 of the Defendant's wrongful conduct, as alleged above, the Plaintiffs and millions of  
45 others other members of the Plaintiffs class, who are unknown to the Plaintiffs but can be  
47 identified through inspection of the Defendant's records reflecting requests for removal it  
49 has already received and by other means, have been subjected to unlawful and unwanted  
51 publication of in accurate, inadequate, irrelevant, false, excessive, malicious and  
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1 defamatory internet postings about themselves and as a result of the Defendant,  
3 GOOGLE's present policies, have thereby been deprived of their right to privacy and the  
5 right to control information published about them as this control now apparently is vested  
7 in the Defendant GOOGLE, INC and not in and of themselves.

9 119. The Plaintiffs is entitled to relief, including full restitution  
11 for the unfair practices of the Defendant, GOOGLE as these have damaged their reputation  
13 and their business prospects and deletion or de-ranking of any article naming him a scam  
15 artist as inaccurate and currently irrelevant.

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

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

37 122.. The Plaintiffs has incurred and, during the pendency of this  
39 action, will incur expenses for attorney's fees and costs herein. Such attorney's fees and  
41 costs are necessary for the prosecution of this action and will result in a benefit to each of  
43 the members of the class. The sum of \$500,000.00 is a reasonable amount for attorney's  
45 fees herein.  
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53 **Seventh Cause of Action**

55 **THEFT OF INTELLECTUAL PROPERTY**

[Against the Defendants and DOES 1 through 50, inclusive]

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3 123. The Plaintiffs hereby incorporate by reference the allegations  
5 set forth in paragraphs 1 through this paragraph inclusive as though fully set forth herein.

7 124. Plaintiffs venture fund has founded, funded and launched  
9 multiple business ventures based on novel new technology inventions. In the majority of  
11 the cases, Defendants engaged in industrial espionage of Plaintiff's new ventures,  
13 including using agents to solicit Plaintiff's for information under the guise of "possibly  
15 investing", and then copied and exploited those ventures for substantial profit while  
17 running attacks on Plaintiffs venture in order to blockade any attempt at competition.  
19 Defendants engaged in systematic venture capitol black-listing, funding cartels, the hiring  
21 of attack-media hatchet job bloggers, internet search rigging and numerous other dirty  
23 tricks campaigns in order to steal technology and business ideas. SEC, U.S. Senate  
25 Investigators, broadcast news journalists, other federal investigators and records from other  
27 lawsuits have provided testimony that Defendants have paid Gawker Media "tens of  
29 millions of dollars" for "special services". Of millions of publications in the world, only  
31 Gawker Media engaged in the media attacks against Plaintiff and only the Defendants  
33 derived the core benefits of those attacks. A list of the Plaintiffs business ventures  
35 interdicted and copied by Defendants includes:  
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45 **125. A. - Clever Industries ([www.cleverindustries.com](http://www.cleverindustries.com)) Parent**  
47 **Venture Fund-** Formed 1976 – All inventions first developed under Clever Industries then  
49 rolled out as separate ventures to seek to sell their services or products. If blockaded by  
51 competitors, they were then sold as a whole to seek to offset investors. The ventures,  
53 below, were incubated by Plaintiff via the Clever Industries venture group: Defendants are  
55 charged with copying and profiting off of Plaintiffs property as **Google Ventures, Google Ideas and Google X**

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**126 - B. - RPI Advanced Technology Group**

(<https://scottalbum.wordpress.com/2015/05/20/vr/>) Virtual Reality Spin Out- Formed 1990. Sold to European Investment Group. Defendants are charged with copying and profiting off of Plaintiffs property as **Google Glass, Google Cardboard and Google VR.** RPI Advanced Technology Group (RPI) developed, manufactured, and sold a variety of virtual reality devices including what at the time was the smallest wearable computer display, delivered as a pair of glasses, and the first 360 degree personal computer-based gyroscopic flight simulator. These devices were sold to Spectrum Holobyte, Battele, U.S. Navy, Edison Brothers, FOX Network, MCI, and other major entities, and are used globally in defense and entertainment applications. These devices were based on several of Plaintiff's US. Patents: (Method and apparatus for generating and processing absolute real time remote environments -Filed in 1995, Issued in 1998); (Method and apparatus for generating and processing absolute real time remote environments Filed in 1993, Issued in 1996); and (Method and apparatus for generating and processing absolute real time remote environments Filed in 1990, Issued in 1993). In 1996, Plaintiff sold RPI to a European investment company. Plaintiff has continued their work in VR (<https://virtualrealitydesigns.wordpress.com>) up to today as a consultant and product designer, and filed U.S. Patent App # confirmation 61269822063009 and 17119 USPTO 063009 "*Clip-on appliance suite for PDA or cellphone*" on the first use of a smart phone as a VR headset and marketed by America Invents. Plaintiff is featured on a special segment of E! Entertainment News Network, broadcast globally, describing their consulting work for Oliver Stone's virtual reality video feature film series: "*Wild Palms*".

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**127. - C.- Virtual Reality Designs - (**

**<https://virtualrealitydesigns.wordpress.com> )** formed as proprietorship in 2006. Defendants are charged with copying and profiting off of Plaintiffs property as **Google Glass, Google Cardboard and Google VR**

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**128. - D. PFS Aerospace (<http://pfs-aerospace.weebly.com>)**

Proprietorship. Defendants are charged with copying and profiting off of Plaintiffs

1 property as **Google Loon and Google Satellite and Google's Space X**. PFS Aerospace  
2 (<http://pfs-aerospace.weebly.com>) is an Aerospace company. PFS received a U.S.  
3 Patent and file U.S. Patent applications, including No. 20040089763 on the technology  
4 known as the "microthruster" in it's small format design or "EM-Drive" in it's large-format  
5 design. This propulsion technology uses electronic ion-streams to push objects along their  
6 path of travel as a transportation propulsion engine. Microthrusters are now in use on  
7 multiple NASA, DoD and Telco spacecraft in outer space and on numerous devices on  
8 Earth. PFS overcame NASA patent prior art on the same technology when Plaintiff  
9 demonstrated for the U.S. Patent Office a steerable 4-foot diameter, entirely electronic, ion-  
10 propulsion craft flying, for U.S. Patent Office reviewers and validated in front of Intel's  
11 lead patent officers. Plaintiff's teams have launched their crafts to the edge of space and  
12 back. The technology allows something as simple as a weather balloon with a layered pop-  
13 proof polymer skin and internal filament tension cords, to go beyond the buoyancy point,  
14 where other balloons simply "stop or pop", and enter outer space to carry a micro satellite.  
15 PFS specialized in lighter-than-air launch vehicles, particularly for global communications  
16 enhancement.

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31 129. - E. - **Peep Wireless Telephony Company** was a Delaware  
32 corporation, the registration was cancelled and it was rolled back into a proprietorship  
33 when the attacks by Defendants commenced. **Peep** was put on hold during the attack by  
34 Defendants which included the use of Defendants fronts known as In-Q-Tel, Jigsaw and  
35 New America Foundation and the insertion of Defendants into the "Arab Spring"  
36 controversy in order to potentially rig Lithium mining deals in the Middle East for  
37 Defendants electric car companies per the articles promoted by Defendants entitled:  
38 "*Afghanistan is the Saudi Arabia of Lithium*". Plaintiffs sued Defendants financial  
39 associate: a group known for dirty-tricks-for-hire services called: In-Q-Tel, and forced In-  
40 Q-Tel to stand before a federal judge in a San Francisco court room and explain how their  
41 "501 C 3 Non-Profit Charity Status" coincided with the removal of five tons of Cocaine  
42 from their aircraft in a raid by DEA officials, why In-Q-Tel staff work for Google and Elon  
43 Musk and why Google's Eric Schmidt and In-Q-Tel have exchanged so much in the way of  
44 financial upsides in efforts funded by U.S. taxpayers. This telephone-based application  
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1 (<http://tel-app.weebly.com>)( <http://democri-c.weebly.com> ). Defendants are charged with  
3 **copying and profiting off of Plaintiffs property** as peer-to-peer internet technology,  
5 **Serval, Commotion** and **Google Ideas**. Peep Wireless Telephony Company was a  
7 Delaware corporation. Peep was put on hold during the Google attack. This telephone-  
9 based application (<http://tel-app.weebly.com>) was initially personally funded by Plaintiff. It  
11 is an early stage company developing and delivering software that offers billions of dollars  
13 in savings by replacing the current system of server racks and cell towers employed by  
15 wireless network carriers. Peep's technology is based on the technology described in  
17 Plaintiff's application to the USPTO, for "Mesh Based Network Architecture". Earlier  
19 versions of the technology approach have been proven by multiple companies including  
21 the Swedish company TerraNet. According to a September 11, 2007, BBC News Report, in  
23 2007 TerraNet launched demonstration projects in Tanzania and Ecuador and obtained 33  
25 million in financing from the mobile phone manufacturer Ericsson to develop its wireless  
27 mesh technology. See (<http://Znews.bbc.co.uk/Z/hi/technology/6987704.stm>) Nokia has  
29 reportedly since acquired TerraNet. A search of the term "wireless mesh" yields many hits  
31 including a Wikipedia page that includes references to US. Military use of the technology  
33 see ([http://en.wikipedia.org/wiki/Wireless\\_mesh\\_network#cite\\_note-4](http://en.wikipedia.org/wiki/Wireless_mesh_network#cite_note-4); see also  
35 <http://www.meshdynamics.com/militag-mesh\u2014networkshtml>). Peep solved the  
37 problems that have prevented other wireless mesh companies from achieving commercial  
39 success. Plaintiff released a set of the technology, with the help of Steve Jobs at Apple  
41 before his death, as an emergency communications tool for the Japanese Tsunami. Apple  
43 distributed it on the Apple App and emailed the Plaintiff stating it was the fastest App-to-  
45 market cycle in Apple history at the time due to the **life-saving potential of the App**.  
47 Concurrent with the release of that App, the country of Tunisia was having a democracy  
49 uprising and began using the App for its critical-needs social effort. Egypt followed with  
51 the use of the App, and the App was renamed DEMOCRI-C (TM) and had become the first  
53 peer-to-peer mesh network emergency communicability App in the world. This P2P  
55 technology is now embedded in Qualcomm chips, carried in 80% of mobile devices, and  
per (<http://p2p-internet.weebly.com>) is the basis for the new global Internet. DEMOCRI-C  
had no "back-doors" built into it. It was provided free to groups associated with the  
International Red Cross, Amnesty, Human Rights Watch and United Nations related



1 organizations. A later version is now in distribution on all three of the major App stores,  
3 globally.

5                   **130. - E - Limnia, Inc., Inc.**, a Delaware and California corporation  
7 that was incorporated in 2002 (<http://www.limnia.com>) Plaintiff converted it back to a  
9 California company from a Delaware jurisdiction and all California filings are paid up.  
11 Defendants are charged with interdicting and sabotaging Plaintiffs property of Limnia via  
13 **Google's Tesla, Ivanpah, YVC, and lithium mining holdings.** Limnia won key federal  
15 patents, Congressional commendation in the Iraq War Bill, a government grant and  
17 national acclaim. Google circumvented Limnia Government contracts and received  
19 billions of dollars of grants at Limnia's expense by illegally compensating elected,  
21 appointed and other public officials in exchange for taxpayer cash and government  
23 resources in order to acquire tens of millions of dollars of Plaintiff funds and billions of  
25 dollars of potential profits and re-route the funds and the profits to Defendants bank  
27 accounts. Subsequently, Defendants products have failed, been globally labeled as a life  
29 threatening hazard to public safety by the United Nations and the FAA and turned out to be  
31 a portion of a possible commodities scam currently under investigation by the SEC. 3.  
33 **Limnia, Inc.**, formerly named FuelSell Technologies, Inc., a Delaware corporation that  
35 was incorporated in 2002 (<http://www.limnia.com>). Limnia used venture capital funds,  
37 Plaintiff's personal funds, and a US. Department of Energy grant (approx. \$900,000) to  
39 develop a working version of a hydrogen fuel cassette storage and distribution system that  
41 can power every vehicle in America entirely from domestic resources. One venture capital  
43 investor made a substantial return on its investment when it cashed out in 2006. Limnia's  
45 hydrogen cassette prototype has been tested and verified by Sandia Labs and other  
47 partners, and has been delivered to the market globally, and has nearly a hundred emulators  
49 in the market. Sandia research documents industry metrics, billions of dollars of university  
51 research, operational units in the field, and, duplicated products validate Limnia's  
53 technologies. Third party reports demonstrate superior performance to traditional energy  
55 storage and retrieval devices. Sandia determined that a Limnia hydrogen fuel cartridge, the  
same size and weight of a Lithium ion battery, holds substantially more energy than the Li-  
ion battery, which Google investors control. Limnia's technology is based on Plaintiff's

1 exceptional and extensive patent suite including, but not limited to: US. Patents: (Method  
 3 and apparatus for a hydrogen fuel cassette distribution and recovery system) Filed in 2002,  
 5 Issued in 2008); (Solid-state hydrogen storage systems; Filed in 2004, Issued in 2007);  
 7 (Hydrogen storage, distribution, and recovery system\Filed in 2002, Issued in 2007); and  
 9 (Methods for hydrogen storage using doped alanate compositions; Filed in 2003, Issued in  
 11 2006). As the Middle East has fallen to shreds for the West, a plight foreseen by Plaintiff  
 13 per their Iraq War Bill award, offshore fuels have become a severe threat to domestic  
 15 security. Lithium ion battery sources have been shown by federal reports and extensive  
 17 media coverage to be self-explosive, toxic, cancer-causing, factory worker killing, liver-  
 19 damaging, brain-damaging, lung-damaging, fire-causing, war-causing, plane-crashing  
 21 chemical systems, which deteriorate over time. Plaintiff's, Toyota's, KIA's, Honda's,  
 23 Hyundai's, True Zero's and other major brands' approach is the right one for the nation, and  
 25 for public safety. With Congressional commendations in national War bills, Federally  
 27 mandated grants, and historical Federally confirmed U.S. patent issuances, this program  
 made industry history.

29 **131. - G. - XP Vehicles** was formed in 2002  
 31 (<http://xpvehicles.wordpress.com> ). Defendants are charged with interdicting and  
 33 sabotaging Plaintiffs property of XP with **Googles Tesla, Driverless Car and VVC**  
 35 **ownerships.** (<http://earth2tech.com/2010/05/04/google-ventures-the-lesson-of-v-vehicle>  
 37 Google Ventures and The Lesson of V-Vehicle ) Google circumvented XP Government  
 39 contracts and received billions of dollars of grants and profits at XP's expense by illegally  
 41 compensating elected, appointed and other public officials in exchange for taxpayer cash  
 43 and government resources in order to acquire tens of millions of dollars of Plaintiff funds  
 45 and billions of dollars of potential profits and re-route the funds and the profits to  
 47 Defendants bank accounts.

49 **132. - H. - Clever Homes LLC** was an active California  
 51 limited liability company (<https://scottalburn.wordpress.com/2015/05/20/homes/>) sold to  
 53 an investment group. Defendants are charged with copying and profiting off of Plaintiffs  
 55 property as **Google Smart Home, Internet of Things, Nest.** Clever Homes LLC was an

1 active California limited liability company  
2 ( <https://scottalbum.wordpress.com/2015/05/20/homes/> ). Clever Homes is a designer and  
3 builder of environmentally responsible, energy efficient, prefabricated homes. Dwell  
4 Magazine co-sponsored the national launch of the company. Plaintiff founded the  
5 company, was the initial investor, and hired all other members of the company. The  
6 company website shows that more than 20 homes have been designed with the majority  
7 currently in residential use. Better Homes and Gardens featured Plaintiff in their Discovery  
8 Channel educational television series called: "*Building America's Home*". In 2005 Plaintiff  
9 sold their interest in Clever Homes to the current owners. The designs and methods  
10 currently in use by Clever Homes are based on Plaintiff's inventions. Clever Homes at the  
11 San Francisco Giant's SBC Park unveiled a well-known green demonstration home  
12 produced and created by Plaintiff, dubbed "The NowHouse" in October 2004. Plaintiff  
13 developed ways to use debris wood from the Japanese Tsunami recovery as shown on  
14 network television. The NowHouse was subsequently donated to the City and County of  
15 San Francisco and is currently in use as the Bay View Hunters Point Alice Griffith  
16 Community Center. FabModern was an on-line design portfolio of Plaintiff's green home  
17 designs and personal building site. Plaintiff filed 3 patents for digitally networked "Smart  
18 Homes" and built the most visible "Smart Digital Home" in the world, at the time.

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133. - I. Unifree ( <http://www.unifree.biz> ) was created by Plaintiff in San Francisco in 1990. It still exists as a sole proprietorship. Google, itself, is the competitor and is believed to have created the company: "Google" from copying Unifree. Defendants are charged with copying and profiting off of Plaintiffs property as **Google, Inc.** Google's lawyer runs the U.S. Patent Office and is suspected of interfering with Plaintiff patent and trademark filings. Unifree was created by Plaintiff in San Francisco in 1990. Plaintiff received a White House letter from the Vice President for their work in this area. Work has continued and patents have continued to issue up to today. UNIFREE was launched on the web and operated as an on-line search engine. Previously filed patents and Federal records prove pre-existence of the technology, company, and website by Plaintiff prior to the existence of Google. As the name implies, it was a collection of UNIVERSALLY FREE on-line services such as mail, video, search, social

1 networking, messaging, VOIP, etc., UNIVERSALLY available for the world population  
2 and integrated across a common front end. Unifree was a website which, exactly like the  
3 later "Google", offered all of the free on-line services that Google offers today, with a  
4 particular emphasis on on-line media. The United States Patent Office Trademark filings  
5 and records describe the free online services center in a manner that many observers feel  
6 describes the LATER creation of Google. The State of California confirms that UNIFREE  
7 LLC existed with a California Entity Number as of 11/12/1997. The public interest ranking  
8 algorithm that Plaintiff created to automatically determine which links to services would be  
9 ranked above others on the home page, was called "mombot" (tm). It was a robotic  
10 formula that acted as the Internet mom for your web experiences, just as Google does  
11 today. Unifree was fully operational on the World Wide\_Web far longer than Google has  
12 existed. On February 4, 1998 Plaintiff executed a Non-Disclosure Business Partnership  
13 development agreement with Yahoo, Inc. for Unifree, and engaged in numerous time-  
14 stamped email communications with funding inquiries and fishing expedition inquiries  
15 from Google venture capital investors. Plaintiff was featured on a nationally broadcast  
16 hour-long TV program discussing the technology. The name Google was formally  
17 incorporated on September 4, 1998 at girlfriend Susan Wojcicki's apartment in Menlo Park,  
18 California. The first patent filed under the name "Google Inc."

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35 134. - K. - **Techmate** ( <http://techmatesocial.wordpress.com> )  
36 1985. The first known graphics-capable social network sold in the market. Defendants are  
37 charged with copying and profiting off of Plaintiffs property as **Google, Inc. Google,**  
38 **itself,** is a competitor. Techmate was the first to use Mitsubishi modem based picture  
39 phones, computers, faxes and both analog and digital communications lines. Techmate  
40 worked with Henry Dakin and the Washington Street Institute on human interaction  
41 projects and Russian/American relations improvement efforts. Techmate was featured in  
42 national display advertising and had a large subscriber base years before Google or  
43 Facebook even existed. For a number of years, the U.S. Patent Office has been reviewing  
44 a patent award submission by Plaintiff. In 2015 and 2016 the patent office ruled that the  
45 invention of social media networks was invented by either Plaintiff, Yahoo's engineering  
46 group or Mark Zuckerberg. After detailed review, the Patent Office ruled that the evidence  
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1 proved that Plaintiff had produced social media networks years before Yahoo or  
2 Zuckerberg had even formed their companies. As Plaintiff patent was being approved, the  
3 Examiner suddenly contacted Plaintiffs patent attorney and stated that the approval of the  
4 patent had been reversed by the Senior Administration of the U.S. Patent Office. It was  
5 soon discovered that the Senior Administration of the U.S. Patent Office is Michelle Lee,  
6 Google's attorney and shareholder, and her associates, who were lobbied into appointment  
7 by Google. Google is the number one entity who would have been infringing this additional  
8 patent issuance. Congressional, legal and public interest inventor rights groups are now  
9 examining this incident. The social media aspect of Plaintiff's internet engine was deployed  
10 as the TECHMATE (tm) social network (<http://techmatesocial.wordpress.com>) long before  
11 the Google or Facebook founders had even met each other. Techmate was advertised in  
12 Bay Area newspaper display advertising and certified by the State of California in filed  
13 public records with the Secretary of State on March 1, 1987.

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27 135. - L. - **CLICKMOVIE.COM** and **TSBN**  
28 (<http://clickmovie1.wordpress.com/>) existed years before **YouTube**. It still exists as a  
29 California corporation. Defendants are charged with copying and profiting off of Plaintiffs  
30 property as **YouTube**. **Google's YouTube** is a 100% copy of Plaintiff world-reknown  
31 Clickmovie.com. **CLICKMOVIE.COM** (<http://clickmovie1.wordpress.com/>)  
32 **ClickMovie.com** existed years before **YouTube Bittorrent, Napster, Hulu, Sony VUE,**  
33 **Vudu, or Netflix Streaming** was even formed or existed. Its patents pre-date the formation  
34 of YouTube by many years. A half hour broadcast television show on the TV series Silicon  
35 Valley Business Report and the vast number of articles, Consumer Electronic Show (CES)  
36 presentations and letters documents Clickmovie. It was the world's first public full-screen  
37 video store, online media channel and self-media distribution outlet. It is fair to say that  
38 Plaintiff's idea (<http://networktechnologies.weebly.com>) of delivering all media over the  
39 internet has been verified as a workable idea by every company that touches the internet  
40 including Akamai, Netflix, Bittorrent, Vudu, Hulu, and tens of thousands of others. As  
41 hundreds of documents prove, Sony Pictures engaged in extensive contracts, public  
42 announcements, meetings, deployments, letters, emails, airplane flights, board and  
43 corporate meetings with Plaintiff (even mentioning Plaintiff by name, as their source of  
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1 inspiration, in Sony's Federal patent filings, which were sold to Dish Network by Sony) to  
3 have its first internet video-on-demand hardware and software developed by Plaintiff.  
5 "Clickmovie" and the movie trailer site "Trailer Park" and dozens of App's produced by  
7 Plaintiff were the first of their kind in the market.

9 136. Defendants did have their agents, investors, executives  
11 and staff contact Plaintiff under the guise of "considering an investment" in order to induce  
13 Plaintiff to disclose trade secrets under false promises of confidentiality

15 137. The New York Times newspaper and digital  
17 publications group published an investigative article entitled: *"How Larry Page's  
19 Obsession Became Google's Business "* on January 22, 2016 by CONOR DOUGHERTY.  
21 This article describes the manner in which Google founder, Larry Page, seeks to steal  
23 ideas, for Google, from young entrepreneurs and inventors, much as he appears to have  
25 done to Plaintiff. The article discloses the covert manners in which Defendants harvest  
27 intellectual property without revealing their true identities or actual intentions.

29 138. Hundreds of reporters, clients and members of the  
31 public have commented that: "Google seems to copy everything you come up with" to  
33 Plaintiff. In one specific instance, a television show entitled the Silicon Valley Business  
35 Report did a broadcast report demonstrating how Plaintiff company appeared to have been  
37 nearly 100% copied by Google's YouTube. In another instance, the globally broadcast TV  
39 Network E! Entertainment Network produced a network TV segment about Plaintiff  
41 creation: "Scott Glass" which was later copied by Google as: "Google Glass" with nearly  
43 verbatim features, appearance

45 **WHEREFORE, the Plaintiffs prays for judgment as follows, in the class action  
47 section of this complaint:**

49 1. For restitution to the Plaintiffs and each other member of the  
51 class, as their or her interest may appear, of all sums unlawfully collected by the defendant  
53 from the Plaintiffs and other members of the class since January 1, 2008



1                   2. For interest on these sums at the legal rate from the date of each  
3 unlawful collection

5                   3. For a permanent injunction enjoining the defendant, and the  
7 defendant's agents, servants, and employees, and all persons acting under or in concert  
9 with them, to cease and desist from the following acts:

11                   a. To desist from refusing to honor The Right To Be Forgotten in the  
13 United States

15                   b. To desist from operating as a monopoly

17                   c. To desist from hiding codes within the internet architecture which  
19 manipulate the ranking or perception of search results  
21

23                   d. For the refund of monies which were acquired from users wherein  
25 those users were not informed in a manner comprehensible to a high-school educated  
27 person of the risks of the use of Defendants services.  
29

31                   5. For an order requiring the Defendant to compile a list identifying,  
33 as far as possible, all other persons who have had their data harvested by the defendant,  
35 and to send each such person a written offer to return any data which was harvested and to  
37 refund the unconscionable fees.  
39

41                   6. For the payment of the Plaintiff's attorney's fees out of the  
43 moneys recovered for the joint benefit of the members of the class;

45                   7. For costs of suit herein incurred; and For such other and further  
47 relief as the court may deem proper.  
49

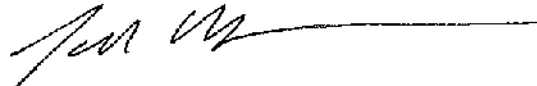
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1 **WHEREFORE, Plaintiffs prays judgment against defendant in the as follows in the**  
3 **non-class action sections of this complaint**

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11 1. For general damages according to proof;  
13 2. For special damages according to proof;  
15 3. For exemplary or punitive damages;  
17 4. For a preliminary injunction and a permanent injunction enjoining defendant and  
19 their/her agents, servants, and employees, and all persons acting under, in concert with, or  
21 for him/her from continuing to publish the above-described private facts about Plaintiffs.  
23  
25 5. For costs of suit herein incurred; and  
27 6. For such other further relief as the court may deem proper.  
29 7. For an award of 15% of Defendants gross revenue since inception wherein that revenue  
31 was derived from profits made from the use of, or interdiction of, Plaintiffs products,  
33 services and technology.  
35  
37 8. For a contribution of one billion dollars to Plaintiff's community public interest fund.

39  
41 [firm name, if any] N/A at this time. In Pro Per

43 By: [signature]



45  
47 [typed name] Scott Douglas Redmond

49 Attorney for Plaintiffs [name]- None. In Pro Per

51  
53  
55 **VERIFICATION**

1 I, Scott Douglas Redmond, am the Plaintiffs in the above-entitled action. I have read the  
3 foregoing complaint and know the contents thereof. The same is true of my own  
5 knowledge, except as to those matters which are therein alleged on information and belief,  
7 and as to those matters, I believe it to be true.

9 I declare under penalty of perjury under the laws of the State of California that the  
11 foregoing is true and correct.  
13

15 [date] MAY 5, 2016

17 [signature]

19 [typed name] Scott Douglas Redmond  
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