

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RAHUL MANCHANDA,)	
)	
Plaintiff,)	INDEX NO. 16-CV-03350
)	
v.)	
)	BRIEF AND MEMORANDUM OF LAW
GOOGLE, YAHOO, MICROSOFT BING)	IN SUPPORT OF MOTION FOR
)	CONTEMPT
Defendants.)	
-----X)	

Rahul Manchanda, an Attorney duly admitted to practice throughout the federal, state and local courts of New York State, in support of his Motion for Contempt in this Honorable Court, hereby submits this Brief and Memorandum of Law, and does hereby state:

1. As per the attached documentary exhibits and evidence, Plaintiff is herein providing documentary proof that Google (which holds 70% of the internet search engine market) as well as Yahoo and Microsoft Bing (which hold the other 30%) operate purposefully to destroy political dissidents, targeted racial/ religious/ ethnic minorities both in the United States of America and throughout the world, carrying out their Anglo-Zionist propaganda all the while working hand in hand with Western Intelligence agencies to character assassinate and ruin those businesses and individuals that they together deem to be unfavorable or unworthy, while promoting and vaulting those businesses and individuals that they do in fact support;
2. **Exhibit A** is an article written by Glenn Greenwald of the Intercept, entitled "How Covert Agents Infiltrate the Internet to Manipulate, Deceive, and Destroy Reputations," wherein the author goes into great detail to support his underlying thesis that "one of the many pressing stories that remains to be told from the Snowden archive is how western intelligence agencies are attempting to manipulate and control online discourse with extreme tactics of deception and reputation-destruction...It's time to tell a chunk of that story, complete with the relevant documents;"
3. **Exhibit B** is an article written by Wikileaks Founder Julien Assange, entitled "Google Is Not What It Seems," wherein the author goes into great length and detail providing proof and evidence that Google led by Executive Chairman Eric Schmidt and Jared Cohen, Director of "Google Ideas," actively travel the world to pressure, threaten, intimidate, harass, blackmail, and extort their targets on behalf of Western Intelligence to torture political dissidents, character assassinate targeted individuals and others to get them to comport with their Anglo-Zionist Agenda, and destroy those businesses and individuals that they feel are not "towing the line politically," ie, "Cohen's directorate appeared to cross over from public relations and

'corporate responsibility' work into active corporate intervention in foreign affairs at a level that is normally reserved for states...Jared Cohen could be wryly named Google's 'director of regime change,' further detailing how "he (Cohen) was trying to plant his fingerprints on some of the major historical events in the contemporary Middle East...He could be placed in Egypt during the revolution, meeting with Wael Ghonim, the Google employee whose arrest and imprisonment hours later would make him a PR-friendly symbol of the uprising in the Western press...Meetings had been planned in Palestine and Turkey, both of which—claimed Stratfor emails—were killed by the senior Google leadership as too risky," and "Cohen was planning a trip to the edge of Iran in Azerbaijan to "engage the Iranian communities closer to the border, as part of a Google Ideas' project on 'repressive societies,' and in internal emails Stratfor's vice president for intelligence, Fred Burton (himself a former State Department security official), wrote 'Google is getting WH [White House] and State Dept support and air cover... in reality they are doing things the CIA cannot do...might be the best thing to happen to expose Google's covert role in foaming up-risings, to be blunt...the US Gov't can then disavow knowledge and Google is left holding the shit-bag;"

4. **Exhibit C** is an article entitled "Google's deep CIA and NSA connections" by Eric Sommer, in which the author describes how "the Western media is currently full of articles reporting Google's denial that it cooperated in a government program to massively spy on American and foreign citizens by accessing data from Google servers and those of other U.S. software companies...the mainstream media has, however, almost completely failed to report that Google's denial, and its surface concern over 'human rights', is historically belied by their deep involvement with some of the worst human rights abuses on the planet: Google is, in fact, a key participant in U.S. military and CIA intelligence operations involving torture; subversion of foreign governments; illegal wars of aggression; and military occupations of countries which have never attacked the U.S. and which have cost hundreds of thousands of lives in Afghanistan, Iraq, Pakistan, and elsewhere," and "it should be noted that the U.S. government and its intelligence agencies have a long history of rogue operations intended to discredit governments or social movements with whom they happen to disagree...to see how far this can go, one need only recall the sordid history of disinformation, lies, and deceit used to frighten people into supporting the Iraq war;"
5. **Exhibit D** is an article written by Nafeez Ahmed entitled "How the CIA made Google: Inside the secret network behind mass surveillance, endless war, and Skynet," wherein the author goes into great detail about how "INSURGE INTELLIGENCE, a new crowd-funded investigative journalism project, breaks the exclusive story of how the United States intelligence community funded, nurtured and incubated Google as part of a drive to dominate the world through control of information...seed-funded by the NSA and CIA, Google was merely the first among a plethora of private sector start-ups co-opted by US intelligence to retain 'information superiority,'" the article going on to describe how "the origins of this ingenious strategy trace back to a secret Pentagon-sponsored group, that for the last two decades has

functioned as a bridge between the US government and elites across the business, industry, finance, corporate, and media sectors...the group has allowed some of the most powerful special interests in corporate America to systematically circumvent democratic accountability and the rule of law to influence government policies, as well as public opinion in the US and around the world...the results have been catastrophic: NSA mass surveillance, a permanent state of global war, and a new initiative to transform the US military into Skynet," and then the author goes on to discuss how "Google styles itself as a friendly, funky, user-friendly tech firm that rose to prominence through a combination of skill, luck, and genuine innovation...this is true...but it is a mere fragment of the story...in reality, Google is a smokescreen behind which lurks the US military-industrial complex," and operates as a "shadow network" wherein "for the last two decades, US foreign and intelligence strategies have resulted in a global 'war on terror' consisting of prolonged military invasions in the Muslim world and comprehensive surveillance of civilian populations...these strategies have been incubated, if not dictated, by a secret network inside and beyond the Pentagon," and that "from inception, in other words, Google was incubated, nurtured and financed by interests that were directly affiliated or closely aligned with the US military intelligence community - many of whom were embedded in the Pentagon Highlands Forum;"

6. Plaintiff is an established political dissident since at least 2007, having advocated for a peaceful resolution towards the US-Iran conflict through the use of diplomacy, abandonment of outdated colonialist attitudes and racist mentalities towards the third world, and respect for the indigenous people of Iran and the rest of the world, instead of outright carpet-bombing the people into submission and destruction - after contributing to a report entitled "Reframing Iran: Views from the Field," **(Exhibit E)** on behalf of the Network 20/20 political/social group based in New York City after having traveled there in 2006/2007, Plaintiff was besieged by an onslaught of vicious online character assassination starting in June 2007 with fake "client posts," and attacked with online lies, threats against him and his family, countless false postings on "grip-sites," as well as other false, defamatory, slanderous, and libelous postings by hitherto anonymous posters online designed to destroy Plaintiff both professionally and personally, and it worked - by 2016 Plaintiff, who was once the darling of CNN, FoxNews, MSNBC, and other media outlets, and who was grossing more than a million dollars per year with a law firm staff approaching 20, was reduced to someone who was forced to file bankruptcy 4 times both personally and professionally, with false disciplinary complaints, audits, and "copycat complaints" filed by individuals and corporations who simply did not want to pay Plaintiff's bills and invoices as they came due, also destroying his family and social life, and other devastating effects and ancillary problems associated with this purposeful character assassination online;
7. Based on Google's behavior in outright refusing to follow 2 valid court orders, their own official internal written policies, as well as the articles/facts described above and in the Exhibits, plaintiff is certain that there is more to this story - and this lawsuit and Motion for Contempt intends to get to the bottom of

it through exhaustive and extensive discovery and litigation;

WHEREFORE Plaintiff respectfully requests that this Court grant the Relief requested within the confines of the original Summons and Complaint, seal the record owing to the sensitive nature of the case proceedings and due to Defendants' further harassment thereon, sanction the Defendants for vexatious and harassing litigation, hold Defendants Google, Yahoo, and Microsoft Bing in Contempt of Court for willfully and flagrantly disobeying 2 valid NYS Supreme Court Judicial Orders in the amount of \$100,000,000, remand the case back to the NY Civil State Court for speedy resolution and adjudication, and whatever other remedies this Honorable Court deems to be just and proper under the circumstances.

Respectfully submitted,

Dated: May 29, 2016
New York, New York

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CERTIFICATE OF SERVICE

I hereby certify that on the May 29, 2016, I caused a true and correct copy of the foregoing Plaintiff's Brief and Memorandum of Law In Support of Motion for Contempt to be served by ECF and US Mail upon the Defendants at their previously submitted and last known addresses.

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By:

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General Information

Court	United States District Court for the Southern District of New York; United States District Court for the Southern District of New York
Federal Nature of Suit	Property Rights - Trademark[840]
Docket Number	1:16-cv-03350