

Indictment

Plaintiff: Qian Haocheng
Capacity: Self-media creator
Address: 15 Carolyn Ln 15 Carolyn Ln
North Windham
CT 06256
Phone: 650-410-0236

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FILED-USDC-CT-HARTFORD

First Respondent: YouTube Inc.
Address: United States 950 Cherry Ave, San Bruno, CA 94066
Tel: —

Second DEFENDANT: Google Inc.
Address: 1600 Amphithe
Tel: —

Suit against YouTube and Google for Economic Damages Caused by Restrictions on Speech

Cause:

Plaintiff is a dissident from mainland China who, since coming to the United States in 2020, has opened Series YouTube channel (1st Defendant) that includes: News, Faith, Science and Technology, Global Citizenship, Don't Forget June 4th, One Sentences Enlightenment, and a member channel that includes sections on "Future Generations, Humanities, Health, Marriage," for a total of 7 channels and 12 sections. The purpose is to stop the systematic and all-round deception of Chinese people and Chinese-American by the Chinese Communist Party's CCTV.

On January 24, 2022, Plaintiff's Google account was hacked by the CCP. Upon restoration of the account, Plaintiff's channel began to be subject to various unusual "restrictions" by the Chinese Language Department of YouTube (the First Defendant). Many of these actions are identical to the speech restrictions used by the CCP in its treatment of political dissidents in mainland China.

In addition, YouTube (First Defendant) used its monopoly over the platform, its dominant position in traffic and advertising, and its right to distribute advertising dollars to arbitrarily restrict Plaintiff's attention and traffic, and the distribution of advertising revenue. As a result, the Plaintiff has suffered substantial financial losses.

Specifically, as follows:

1. YouTube (1st Defendant) employs a text filtering censorship system that restricts the use of text, thereby limiting and damaging Plaintiff's ideas and expression;
2. that YouTube (the 1st Defendant) infringed upon the Plaintiff's intellectual property rights by deleting the entire channel created by the Plaintiff, "Don't Forget June 4", as well as other works, without any warning or prompting;
3. that YouTube (the 1st Defendant) repeatedly used the Plaintiff's previous videos to ban the Plaintiff. Apparently, this was specifically directed at the Plaintiff;
4. that YouTube (the 1st Defendant) falsely accused the Plaintiff of stealing other people's videos as a reason to cancel the Plaintiff's membership and channel income
5. that YouTube (the 1st Defendant) arbitrarily used "yellow tags (restricted ads)" to embezzle the Plaintiff's traffic and cause the Plaintiff financial losses
6. the targeted use of "yellow tags (restricted advertising)" by YouTube (the 1st Defendant) against the Plaintiff and the cancellation of the Plaintiff's advertising revenue;
7. the use of "invalid traffic" by YouTube (1st Defendant) to embezzle the Plaintiff's traffic and massively reduce the Plaintiff's revenue
8. the use by YouTube (1st Defendant) of its censorship privilege to force Plaintiff to self-censor and create psychological fear in Plaintiff
9. that YouTube (1st Defendant) used its monopoly position to reduce Plaintiff's social influence through frequent suppression by various means
10. YouTube (the 1st Defendant) misappropriated and stole the rights of the Plaintiff's broadcasters, in violation of the principle of commercial fairness.

Based on the above conduct, Plaintiff believes that YouTube's (1st Defendant) Chinese Language Department is suspected of acting as an agent of the Chinese Communist Party. Its conduct objectively creates Humanities and racial divisions in the Chinese American community and poses a potentially great danger to the national security of the United States. Personally, the Chinese Language Division of YouTube (1st Defendant) has violated the

principle of equality in business and has directly or indirectly caused me great financial loss.

Google (Second Defendant), as the owner of YouTube (First Defendant), is liable for the inadequate supervision of the Chinese Language Division of YouTube (First Defendant).

Make claims for:

1. that YouTube (1st Defendant) and Google (2nd Defendant) jointly compensate the Plaintiff for direct and indirect economic damages
2. demand that YouTube (the first defendant) and Google (the second defendant) jointly improve their internal supervision, separate their platform and commercial operations, and conduct their business in an open and transparent manner
3. demand that YouTube (the first defendant) and Google (the second defendant) publicly apologize to the plaintiff in major media for this incident and recover the damages caused to the plaintiff in terms of social impact as a result;
4. to demand that YouTube (the first defendant) and Google (the second defendant) jointly bear the resulting social consequences and accept punitive damages.

Plaintiff: Haocheng Qian

Haocheng Qian

Date: *April. 24, 2023*