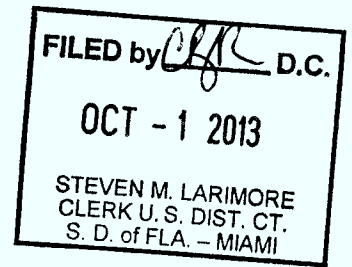


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA



URI DOWBENKO,

Plaintiff

-against-

GOOGLE INC., LARRY PAGE,
ERIC E SCHMIDT, SERGEY BRIN,
DAVID C. DRUMMOND, JOHN DOE a/k/a
“G.D.,” “CHAOSPET,” ENCYCLOPEDIA
OF AMERICAN LOONS, HTTP://
AMERICANLOONS.BLOGSPOT.COM

Defendants.

COMPLAINT

Plaintiff Uri Dowbenko, as and for his complaint against defendants Google, Inc, Larry Page, Eric E. Schmidt, Sergey Brin, David C. Drummond, John Doe a/k/a “G/D”, “chaospet,” Encyclopedia of American Loons, and [http://american loons.blogspot.com](http://americanloons.blogspot.com) (collectively, “Defendants”) alleges, upon knowledge as to himself and otherwise upon information and belief, as follows:

NATURE AND BASIS OF THIS ACTION

1. This is an action for defamation arising from Defendants’ malicious publication of an article authored by “G.D.” and/or “Chaospet,” dated November 29, 2010 entitled “Encyclopedia of American Loons: Uri Dowbenko” (the “Article”). The Article attributed patently false and outrageous statements to Mr. Dowbenko that in fact Mr. Dowbenko never made and otherwise grossly misrepresented Mr. Dowbenko as an “American Loon” and calling him a “Batshit insane tin foil hatter, who is lacking any capacity whatsoever to rationally evaluate evidence, reasons and arguments.”

2. Defendants published the Article on a website they own, control and maintain, namely <http://american.loons.blogspot>. Defendants' malicious publication of the Article has damaged Mr. Dowbenko's good name and professional reputation, since the Google search engine has manipulated search results so that the Article is ranked just below Mr. Dowbenko's personal website, www.uridowbenko.com. Mr. Dowbenko seeks both compensatory and punitive damages as a result of Defendants' egregious misconduct.

THE PARTIES

3. Plaintiff Uri Dowbenko is an individual who is a resident of the State of Florida. Mr. Dowbenko is an entrepreneur, investigative journalist, publisher, artist, gallerist and author of "Bushwhacked: Inside Stories of True Conspiracy" and "Hoodwinked: Watching Movies with Eyes Wide Open." Mr. Dowbenko is a highly respected writer and artist and is a person of the highest degree of integrity, honesty and credibility.

4. Upon information and belief, Defendants John Doe a/k/a "G.D." and "chaospet" are Google employees and/or blog writers, whose blog is hosted and controlled by Google, as part of the Google Blogger division of the company.

5. Upon information and belief, Defendants Larry Page, Eric E. Schmidt, Sergey Brin, and David C. Drummond are residents of California and officers of Google Corporation.

6. Upon information and belief, Defendant Google Corporation is a corporation organized under the laws of Delaware with its principal place of business in Mountain View, California. Google does business as the website www.google.com or otherwise owns, controls and maintains that website, as well as the Blogger website called <http://american.loons.blogspot>.

JURISDICTION AND VENUE

7. This court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332, in that this is an action between citizens of different states. The amount in controversy exclusive of interest and costs exceeds seventy-five thousand dollars (\$75,000).

8. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2), in that a substantial part of the events or omissions giving rise to the claim occurred in this District.

BACKGROUND FACTS

9. On November 29, 2010, Defendants Google published the Article by, among other things, posting the Article on the websites www.google.com and <http://americanloons.blogspot>. The Article contains false, defamatory, malicious and libelous statements concerning Mr. Dowbenko. A copy of the Article is attached as Exhibit 1.

10. Simply put, the Article disparages Mr. Dowbenko with false, defamatory, malicious and libelous statements, as follows:

November 29, 2010 #111: Uri Dowbenko

“Welcome to the deepest, murkiest abysses of loonland; this is the area where there is no discussion of the Illuminati’s control over the world, but about whether they are Jews, aliens or lizard men. In a dark pit in this abyss resides the artist and author Uri Dowbenko.

“Dowbenko believes, for instance, that Pat Robertson is a covert Satanist (he is also 33rd degree Mason and notorious proponent of the Satanic agenda for Planet Earth). Now, due to Robertson’s well-established vileness, the idea might not sound so far-fetched. However Dowbenko’s argument isn’t based on that, but rather on a series of obviously allegiance-pleading, secret hand signals Robertson has been making on several occasions (why exactly he would flash these signals if he were part of the conspiracy is

never really explained). George Bush is part of the secret agenda as well (again, the hand signals are the evidence). Arnold Schwarzenegger too (this one is a marvelous website, by the way). And also Clinton and Carter, of course.

“He has written, among other things, Bushwhacked (there is another, more famous book with that title as well) - according to Dowbenko himself has been described as “compelling” and “well sourced, packed with new revelations.” (he doesn’t say by who)) and Hoodwinked, a series of movie reviews that seems to have a tentative grasp of the distinction between fiction and reality. You can find more info at this site, which Dowbenko also contributes to. He also founded this site (turns out that Obama has also been captured showing something like the secret handsign of Pat Robertson).

“A collection of articles is here.

“Diagnosis: Batshit insane tinfoilhatter, who is lacking any capacity whatsoever to rationally evaluate evidence, reasons and arguments. He is probably harmless, though, and rather entertaining.”

11. To reiterate the Article contains false, defamatory, malicious and libelous statements concerning Mr. Dowbenko. It is evident on its face that the Defendants published this article with knowledge that the statements were false, or with a reckless disregard as to the truth or falsity of the statements contained in it.

12. The Article then appears to have been “gamed” (manipulated) by Defendants through their use of algorithms to appear just below Mr. Dowbenko’s own website, so that the false statements and disparaging remarks about Mr. Dowbenko have been read by an incalculable number of people, including individuals and entities that have actual and prospective business dealings with Mr. Dowbenko.

13. Other internet search engines besides Google, namely Yahoo.com, Bing.com, Ask.com, Dogpile.com, Excite.com, Goodsearch.com, DuckDuckGo.com, and Blekko.com have a completely different set of search results for a search of “Uri Dowbenko” with no inclusion of the defamatory Article published by Defendants, who have been able to manipulate search results, so that this defamatory Article appears in

search results just below Mr. Dowbenko's own website. A copy of the search results from various search companies as compared to Google's search results appears as Exhibit 2.

14. This perversion of search results by Defendants not only defames and severely damages a respected, innocent and decent human being, it creates a fraud on the public by its defamatory attack on investigative journalism.

15. By its intentional and reckless conduct, the Defendants has caused substantial harm to Mr. Dowbenko in complete disregard of the truth and without a semblance of human integrity. The suit seeks to set the record straight and obtain recompense for the injuries Mr. Dowbenko has suffered.

FIRST CAUSE OF ACTION
(Defamation)

18. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 15 above as though fully set forth herein.

19. Defendants knew that the Article concerning Mr. Dowbenko was false and defamatory when the Defendants published it to others, or the Defendants published the Article with reckless and wanton disregard as to whether it was true or false.

20. Defendants acted in a grossly irresponsible manner without due consideration for the standards of information gathering and dissemination ordinarily followed by responsible parties. The Article was published by the Defendants with the level of outrageous conduct that constitutes malice, wantonness, recklessness, or willful disregard of the rights of Mr. Dowbenko and the damages that would be inflicted upon him.

21. At the time the Article was published and previously, Mr. Dowbenko was a

respected member of the community and the business community in particular. As a result of the publication and acts of the Defendants, Mr. Dowbenko has been held up to public contempt, ridicule, disgrace and prejudice; has suffered great mental pain and anguish; and has been irreparably injured in his good name, business reputation, and social standing; and has lost the esteem and respect of his acquaintances, business associates and of the public generally.

22. The Defendants' statements are defamatory per se because they concerned Mr. Dowbenko's trade and business reputation.

23. The Article is defamatory on its face and the placement of the defamatory Article by Defendants' skewed and manipulated search results exposes Mr. Dowbenko to hatred, contempt, ridicule and obloquy, and/or cause him to be shunned or avoided and tend to injure him in his occupation.

24. As a direct and proximate result of the above-described conduct by Defendants, Mr. Dowbenko has suffered general and specific damages in an amount to be determined at trial, but believed to be no less than One Million Dollars (\$1,000,000) including without limitation damage to Mr. Dowbenko's reputation, career and standing in the community.

25. Upon information and belief, Mr. Dowbenko alleges that each Defendant's conduct was done with oppression, fraud and malice and that therefore, the conduct of each Defendant justifies an award of punitive and special damages.

26. Upon information and belief, Plaintiff alleges that, unless enjoined and restrained by the Court, Defendants will republish, repeat and continue to disseminate the Article, all to the continuing injury of Plaintiff, that such continual republication, repetition and

dissemination of the defamatory and offensive falsehoods will cause irreparable harm to Plaintiff by damaging his reputation and adversely affecting his professional and business efforts as well as his personal relationships.

27. Upon information and belief, Plaintiff alleges that he lacks an adequate remedy at law insofar as damages will be very difficult to calculate for such ongoing injuries. By reason of the foregoing, Plaintiff is entitled to a permanent injunction enjoining and restraining Defendants and each of them and all persons acting in concert with them, from republishing, repeating, distributing or otherwise disseminating the Article.

DEMAND FOR RELIEF

WHEREFORE, Plaintiff Uri Dowbenko demands judgment as follows:

- (i) For actual and special damages in an amount to be determined at the trial of this action, but believed not to be less than One Million Dollars (\$1,000,000)
- (ii) For punitive damages
- (iii) For a permanent injunction
- (iv) Granting such other and further relief as the Court deems just and proper.

Dated: Miami, Florida
October 1, 2013



By: 
URI DOWBENKO, PRO SE
POST OFFICE BOX 191242
MIAMI BEACH, FLORIDA 33119
Tel: (866) 317-1390

EXHIBIT 1

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Monday, November 29, 2010

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He has written, among other things, [Bushwhacked](#) (there is another, more famous book with that title as well) - according to Dowbenko himself has been described as "compelling" and "well sourced, packed with new 'revelations.'" (he doesn't say by who)) and Hoodwinked, a series of movie reviews that seems to have a tentative grasp of the distinction between [fiction and reality](#). You can find more info at [this site](#), which Dowbenko also contributes to. He also founded [this site](#) (turns out that Obama has also been captured showing something like the secret handsign of Pat Robertson).

A collection of articles is [here](#).

Diagnosis: Batshit insane tinfoilhatter, who is lacking any capacity whatsoever to rationally evaluate evidence, reasons and arguments. He is probably harmless, though, and rather entertaining.

Posted by chaospet at 1:25 PM

Labels: [conspiracy theory](#), [Satanism scare](#), [tinfoil hat](#), [whale.to](#)

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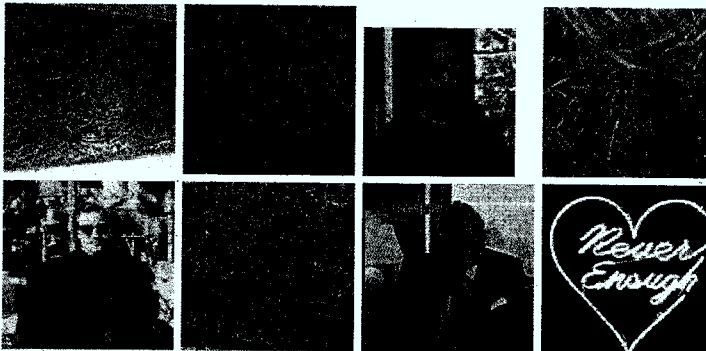
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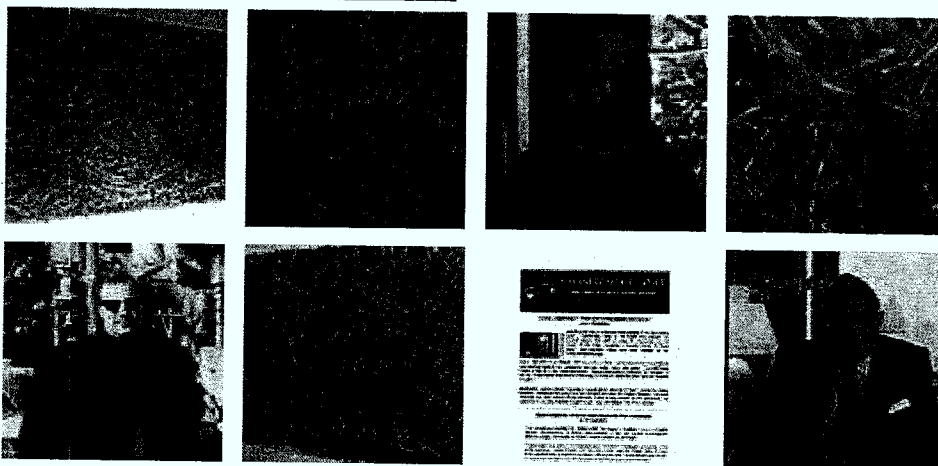
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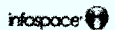
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