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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION
14

15 CHILDREN'S HEALTH DEFENSE,
16 a Georgia non-profit organization,

17 Plaintiff,

18 v.
19

20 FACEBOOK, INC., a Delaware corporation;
21 MARK ZUCKERBERG, a California resident;
22 SCIENCE FEEDBACK, a French corporation;
23 POYNTER INSTITUTE, a Florida corporation;
24 POLITIFACT, a Florida-corporation; and
DOES 1-20,

25 Defendants.
26
27
28

Case No. _____

VERIFIED COMPLAINT

- 1) **FIRST AND FIFTH AMENDMENTS (BIVENS);**
- 2) **LANHAM ACT (15 U.S.C. § 1125(a));**
- 3) **RICO FRAUD (18 U.S.C. § 1962);**
- 4) **DECLARATORY RELIEF.**

JURY TRIAL DEMAND

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