IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Laura Loomer, as an individual, Laura Loomer, in her capacity as a Candidate for United States Congress, and Laura Loomer for Congress, Inc.,	: : : :	Case No. 22-cv-2646
	: :	**FIRST AMENDED COMPLAINT FOR**
	:	**DAMAGES AND**
Plaintiffs,	:	**INJUNCTIVE RELIEF**
	:	
	:	1. Civil RICO
v.	:	2. Civil RICO Conspiracy
	:	
Meta Platforms, Inc. d/b/a Meta f/k/a	:	
Facebook, Inc., Mark Zuckerberg, in his	:	JURY TRIAL DEMANDED
capacity as CEO of Facebook, Inc. and as	:	
an individual, Twitter, Inc., and	:	
Jack Dorsey, in his capacity as former	:	
CEO of Twitter, Inc. and as an individual,	:	
The Proctor & Gamble Company, Does	:	
1-100, Individuals,	:	
	:	
	:	
Defendants.	:	
	:	
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	:	
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_____	:	

INTRODUCTION

1.

In a stunning admission days ago on *The Joe Rogan Experience*, Mark Zuckerberg admitted what many Americans have long suspected – that the decision by social media companies to censor news coverage about the Hunter Biden laptop scandal for the crucial weeks prior to the 2020 Presidential election – was prompted by agents from the Federal Bureau of Investigation warning them about "Russian disinformation." This confirmed what has become one of the worst-kept secrets in modern American political history: that individuals within the United States government's federal law enforcement agencies and the U.S. intelligence apparatus conspired with the big-tech giants to illegally interfere with the 2020 Presidential election.

2.

Also in the last few weeks, prominent COVID-19 vaccine skeptic Alex Berenson revealed that members of President Joe Biden's administration illegally conspired with Twitter to ensure that he was banned from its platform. This was revealed from internal Twitter Slack messages and came to light only because Mr. Berenson brought suit against Twitter. In a rare move, Twitter settled the suit with Mr. Berenson and allowed him back on the platform, presumably to avoid additional harmful discovery proving misconduct and direct coordination and conspiracy to

ban conservative individuals by big-tech companies and the U.S. government coming to light.

3.

These are just the latest two examples of a wide-ranging conspiracy involving social media giants, other elements in corporate America and high-level officials in the Executive Branch of the United States government, to unlawfully censor conservative voices and interfere with American elections.

4.

This action is brought on behalf of one of the primary victims of that conspiracy, two-time U.S. Congressional candidate Laura Loomer, who ran for office in the State of Florida and is also a resident of the State of Florida.

PARTIES

5.

Plaintiff Laura Loomer (Ms. Loomer) is an individual and a citizen and resident of the State of Florida.

6.

Plaintiff Laura Loomer (Candidate Loomer) was the Republican Party nominee for U.S. House Florida District 21 for the 2020 General Election of the United States of America.

7.

Plaintiff Candidate Loomer was a federal candidate for the Republican Party nomination for U.S. House Florida District 11 for the 2022 Primary Election in the State of Florida.

8.

Plaintiff Laura Loomer for Congress, Inc. is a Florida corporation that operates under the registered trade name, Laura Loomer for Congress, Inc.

9.

Plaintiffs Laura Loomer and Laura Loomer for Congress, Inc. are entities engaged in activities that affect interstate and foreign commerce.

10.

Ms. Loomer is the Chief Executive Officer of Laura Loomer for Congress, Inc.

11.

Defendant Meta Platforms, Inc., d/b/a Meta, f/k/a Facebook, Inc. (Facebook) is incorporated in the state of Delaware with its principal place of business located at 1601 Willow Road, Menlo Park, California. Facebook does substantial business in all 50 states including the Northern District of California and the state of Florida.

12.

Defendant Mark Zuckerberg is the Chairman and CEO of Facebook and a resident of the State of California.

13.

Defendant Twitter, Inc. is incorporated in the state of Delaware with its principal place of business located at 1355 Market Street, Suite 900, San Francisco, California. Twitter does substantial business in all 50 states, including the Northern District of California and the State of Florida.

14.

Defendant Jack Dorsey is the former CEO of Twitter, Inc. and a resident of the State of California.

15.

Defendant The Proctor & Gamble Company is incorporated in the state of Ohio with its principal place of business located at 1 Proctor & Gamble Plaza, Cincinnati, Ohio, 45202. Proctor & Gamble does substantial business in all 50 states, including the Northern District of California and the State of Florida.

16.

Defendants Does 1-100 are persons within the Federal Bureau of Investigation, and potentially others within the Executive Branch of the United States government and corporate America, including executives and advertising officials at Proctor & Gamble, who conspired with other Defendants to commit the unlawful acts described herein.

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