

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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Denver, CO 80203

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Case No. \_\_\_\_\_

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STATE OF WYOMING  
2320 Capitol Ave.  
Cheyenne, WY 82002

*Plaintiffs,*

v.

GOOGLE LLC  
1600 Amphitheatre Parkway  
Mountain View, CA 94043

*Defendant.*

## COMPLAINT

1. The States of Colorado, Nebraska, Arizona, Iowa, New York, North Carolina, Tennessee, Utah, Alaska, Connecticut, Delaware, Hawaii, Idaho, Illinois, Kansas, Maine, Maryland, Minnesota, Nevada, New Hampshire, New Jersey, New Mexico, North Dakota, Ohio,

Oklahoma, Oregon, Rhode Island, South Dakota, Vermont, Washington, West Virginia, and Wyoming; the Commonwealths of Massachusetts, Pennsylvania, Puerto Rico, and Virginia; the Territory of Guam; and the District of Columbia, by and through their respective Attorneys General, bring this civil antitrust law enforcement action against Defendant Google LLC (Google) under Section 2 of the Sherman Act, 15 U.S.C. § 2, to restrain Google from unlawfully restraining trade and maintaining monopolies in markets that include general search services, general search text advertising, and general search advertising in the United States, and to remedy the effects of this conduct.

#### **NATURE OF THIS ACTION**

2. Google, one of the largest companies in the world, has methodically undertaken actions to entrench and reinforce its general search services and search-related advertising monopolies by stifling competition. As the gateway to the internet, Google has systematically degraded the ability of other companies to access consumers. In doing so, just as Microsoft improperly maintained its monopoly through conduct directed at Netscape, Google has improperly maintained and extended its search-related monopolies through exclusionary conduct that has harmed consumers, advertisers, and the competitive process itself. Google, moreover, cannot establish business justifications or procompetitive benefits sufficient to justify its exclusionary conduct in any relevant market.

3. Today, Google enjoys virtually untrammeled power over internet search traffic that extends to every state, district, and territory in the United States, and, indeed, into nearly every home and onto nearly every smartphone used in the United States.

4. Google's monopoly position derives principally from its overwhelming and durable monopoly in general internet searches. Close to 90 percent of all internet searches done

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