

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

STATE OF COLORADO  
1300 Broadway, 7th Floor  
Denver, CO 80203

STATE OF NEBRASKA  
2115 Nebraska State Capitol  
Lincoln, NE 68509-8920

STATE OF ARIZONA  
2005 North Central Avenue  
Phoenix, Arizona 85004

STATE OF IOWA  
1305 E. Walnut St., 2nd Floor  
Des Moines, IA 50319

STATE OF NEW YORK  
28 Liberty Street  
New York, NY 10005

STATE OF NORTH CAROLINA  
P.O. Box 629  
Raleigh, North Carolina 27602

STATE OF TENNESSEE  
P.O. Box 20207  
Nashville, TN 37202

STATE OF UTAH  
160 E 300 S, 5th Floor  
PO Box 140872  
Salt Lake City, UT 84114-0872

STATE OF ALASKA  
1031 W. Fourth Avenue, Suite 200  
Anchorage, Alaska 99501

STATE OF CONNECTICUT  
165 Capitol Avenue  
Hartford, CT 06106

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

STATE OF DELAWARE

820 N. French St., 5th Floor  
Wilmington, DE 19801

DISTRICT OF COLUMBIA

400 6th Street, N.W, 10th Floor  
Washington, D.C. 20001

TERRITORY OF GUAM

590 S. Marine Corps Drive, Suite 901  
Tamuning, Guam 96913

STATE OF HAWAII

425 Queen Street  
Honolulu, Hawaii 96813

STATE OF IDAHO

954 W. Jefferson Street, 2nd Floor  
P.O. Box 83720  
Boise, Idaho 83720-0010

STATE OF ILLINOIS

100 W. Randolph St.  
Chicago, IL 60601

STATE OF KANSAS

120 S.W. 10th Avenue, 2nd Floor  
Topeka, KS 66612-1597

STATE OF MAINE

6 State House Station  
Augusta, Maine 04333-0006

STATE OF MARYLAND

200 St. Paul Place, 19th Floor  
Baltimore, Maryland 21202

COMMONWEALTH OF  
MASSACHUSETTS

One Ashburton Place, 18th Fl.  
Boston, MA 02108

STATE OF MINNESOTA

445 Minnesota Street, Suite 1400  
St. Paul, Minnesota 55101-2130

STATE OF NEVADA

100 N. Carson St.  
Carson City, Nevada 89701

STATE OF NEW HAMPSHIRE

33 Capitol Street  
Concord, N.H. 03301

STATE OF NEW JERSEY

124 Halsey Street, 5th Floor  
Newark, NJ 07102

STATE OF NEW MEXICO

408 Galisteo St.  
Santa Fe, NM 87504

STATE OF NORTH DAKOTA

1050 E Interstate Ave, Ste 200  
Bismarck, ND 58503-5574

STATE OF OHIO

150 East Gay Street, 22nd Floor  
Columbus, Ohio 43215

STATE OF OKLAHOMA

313 NE 21st St  
Oklahoma City, OK 73105

STATE OF OREGON

1162 Court St NE  
Salem, OR 97301

COMMONWEALTH OF  
PENNSYLVANIA

14th Floor Strawberry Square  
Harrisburg, PA 17120

COMMONWEALTH OF PUERTO  
RICO

P.O. Box 9020192  
San Juan, Puerto Rico 00902-0192

STATE OF RHODE ISLAND

150 South Main Street  
Providence, RI 02903

STATE OF SOUTH DAKOTA

1302 E. Hwy. 14, Suite 1  
Pierre, SD 57501

STATE OF VERMONT

109 State St.  
Montpelier, VT 05602

COMMONWEALTH OF VIRGINIA

202 North 9th Street  
Richmond, VA 23219

STATE OF WASHINGTON

800 Fifth Ave., Suite 2000  
Seattle, WA 98104

STATE OF WEST VIRGINIA

812 Quarrier St., First Floor  
P.O. Box 1789  
Charleston, WV 25326

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 untrammelled 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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