THEODORE HAUGLAND
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Plaintiff, ***Pro Se***

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

THEODORE HAUGLAND, *Plaintiff,* v. **GOOGLE, LLC**, a Delaware limited liability company; and **ALPHABET, INC.**, a Delaware corporation, *Defendants.*	**Case No.: 1:26-cv-00341-DKW-WRP** **FIRST AMENDED COMPLAINT**

FIRST AMENDED COMPLAINT

I. PARTIES

A. Plaintiff

1. THEODORE HAUGLAND

Street Address: 99-009 Kalaloa St Ste D2016

City and County: Aiea, Honolulu County

State and Zip Code: Hawaii, 96701

Telephone Number: (202)933-3332

E-mail Address: administrator@civillawinc.com

Plaintiff, *Pro Se*

B. Defendant(s)

1. GOOGLE LLC

Job or Title: Delaware Limited Liability Company

Street Address: 1600 Amphitheatre Parkway

City and County: Mountain View, Santa Clara County

State and Zip Code: California 94043

Telephone Number: (650) 253-0000

E-mail Address: Unknown at the time of filing

Registered Agent: c/o Corporation Service Company

Registered Agent Address: 251 Little Falls Drive

Registered Agent City, State and ZIP Code: Wilmington, DE, 19808

2. ALPHABET INC.

Job or Title: Delaware Corporation; Parent Company of Google LLC

Street Address: 1600 Amphitheatre Parkway

City and County: Mountain View, Santa Clara County

State and Zip Code: California 94043

Telephone Number: (650) 253-0000

E-mail Address: Unknown at the time of filing

Registered Agent: c/o Corporation Service Company

Registered Agent Address: 251 Little Falls Drive

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II. JURISDICTION

A. Federal Question Jurisdiction, 28 U.S.C. § 1331

1. Sherman Antitrust Act, §§ 1–2, 15 U.S.C. §§ 1–2 (unlawful restraint of trade and monopolization);
2. Clayton Antitrust Act, §§ 4 and 16, 15 U.S.C. §§ 15, 26 (private antitrust damages and injunctive relief);
3. 28 U.S.C. § 1331 (federal question jurisdiction); and
4. 28 U.S.C. § 1337(a) (jurisdiction over acts regulating commerce and protecting trade against monopolies).

B. Supplemental Jurisdiction, 28 U.S.C. § 1367(a)

1. This Court has supplemental jurisdiction over Plaintiff's Hawaii common law unjust enrichment claim (Claim 7) pursuant to 28 U.S.C. § 1367(a), as that claim arises from the same nucleus of operative facts as the federal antitrust claims.

C. Venue, 15 U.S.C. § 22

1. Venue is proper in this District under 15 U.S.C. § 22 (antitrust venue) because Defendants transact substantial business in Hawaii, including crawling Hawaii-based websites, serving AI Overviews to Hawaii users, and selling advertising to Hawaii businesses. Venue is independently proper under 28 U.S.C. § 1391(b)(2) because Plaintiff resides and operates his business in Aiea, Hawaii, and suffered his injuries in this District.

III. STATEMENT OF CLAIM(S)

Plaintiff Theodore Haugland is a sole proprietor and independent online publisher residing in Aiea, Hawaii. He operates an internet publishing business that produces original civil legal information content — including question-and-answer guides, procedural explainers, statute analyses, case law summaries, and practice-area guides covering civil procedure, tort law, contract law, property law, consumer protection, civil rights, landlord-tenant law, and small claims practice. His business depends on organic search traffic from Google to deliver readers to his website, where he earns revenue through display advertising. Plaintiff brings this First Amended Complaint against Google LLC and its parent company Alphabet Inc. (collectively "Google" or "Defendants") for seven claims arising from Google's coercive and anticompetitive exploitation of its adjudicated search monopoly to extract Plaintiff's content without compensation and to destroy his business.

A. CLAIM 1 — Unlawful Reciprocal Dealing (Sherman Act § 1, 15 U.S.C. § 1)

1. Google controls approximately 89.2% of all U.S. internet search queries (94.9% on mobile). A federal court has already adjudicated that Google holds monopoly power in general search services. *United States v. Google LLC*, No. 1:20-cv-03010-APM (D.D.C. Aug. 5, 2024). Because no publisher can operate a viable online content business without appearing in Google Search, Google's organic search traffic is an indispensable distribution channel — there is no viable alternative.

   Google conditions Plaintiff's access to this indispensable search traffic on Plaintiff providing three additional things to Google for free, without consent or compensation:

   a. Republication of Plaintiff's content in Featured Snippets, People Also Ask boxes, and AI Overviews displayed on Google's search results pages;

   b. Use of Plaintiff's content as training data for Google's large language models (Gemini/AI Overviews); and

c. Use of Plaintiff's content in real-time retrieval-augmented generation (RAG) to compose AI Overview answers.

Google's only opt-out is to block its crawler entirely — which would remove Plaintiff from Google's search index and destroy his business. This is not a free choice; it is a Hobson's Choice imposed by a monopolist. Competing AI companies (including OpenAI) have paid publishers market rates for comparable content rights, proving a fair market price exists. Google refuses to pay because its monopoly power lets it extract the content for free. This coercive conditioning of one product (search traffic) on three uncompensated additional products is unlawful reciprocal dealing that restrains trade.

B. CLAIM 2 — Unlawful Monopoly Maintenance Through Reciprocal Dealing (Sherman Act § 2, 15 U.S.C. § 2)

2. Google willfully maintains its adjudicated search monopoly through the same reciprocal dealing described in Claim 1. Free publisher content makes Google's AI Overviews more capable, which keeps more users on Google's search results page, which deepens Google's query-volume advantage over rivals, which further entrenches the monopoly — a self-reinforcing cycle. Google's own senior AI researcher, Dr. Marc Najork of Google DeepMind, acknowledged in July 2023 — a full year before the nationwide rollout — that AI-generated direct answers "reduce search referral traffic" and "reduce referrals to content providers hurting their ability to monetize." Google deployed AI Overviews nationwide on May 14, 2024, without any publisher compensation mechanism, despite knowing this harm.

C. CLAIM 3 — Unlawful Monopoly Maintenance Through Content Misappropriation (Sherman Act § 2, 15 U.S.C. § 2)

3. Google uses content crawled from Plaintiff's website — without Plaintiff's consent, a license, or any compensation — to train the large language models underlying Gemini and AI Overviews, and to provide real-time grounding context for AI Overview responses. Each AI Overview response grounded by Plaintiff's content earns advertising revenue for Google. Google updated its Privacy Policy on July 1, 2023 to confirm it uses crawled web content for AI training. This tortious misappropriation of Plaintiff's proprietary content — the product of years of legal research, writing, and editorial investment — has given Google an unfair, monopoly-enabled cost advantage in AI development. Competing AI companies pay market licensing rates; Google uses monopoly coercion to extract the same content for free. This conduct maintains Google's monopoly through means other than competition on the merits.

D. CLAIM 4 — Unlawful Monopoly Leveraging Into the Online Legal Information Publishing Market (Sherman Act § 2, 15 U.S.C. § 2)

4. Google has leveraged its adjudicated General Search monopoly into the market for online legal information publishing — the market where Plaintiff competes. Using content misappropriated from Plaintiff and similar publishers (without consent or compensation), Google's AI Overviews now generate and display AI-composed civil law answers at the very top of Google's search results page — above all organic results — for questions such as "What is the statute of limitations for personal injury in Hawaii?", "How do I file a civil complaint?", and "What are the elements of breach of contract?" These AI answers satisfy users' information needs without any click to Plaintiff's website, destroying Plaintiff's advertising revenue. Google has entered Plaintiff's market as a direct competitor using Plaintiff's own content as the raw material — without paying for it — and using its monopoly search distribution to give its competing AI product automatic, dominant placement. No legitimate market entrant could replicate this conduct.

E. CLAIM 5 — Unlawful Monopolization of General Search Services (Sherman Act § 2, 15 U.S.C. § 2)

5. Google's monopoly in general search services — already adjudicated by a federal court — has been willfully maintained through: (a) approximately $26.3 billion in annual exclusive default-placement payments in 2021 alone to Apple, Samsung, Mozilla, AT&T, and others, found unlawful by Judge Mehta; (b) the coercive reciprocal dealing described in Claims 1–2; and (c) the deployment of AI Overviews to answer user queries directly on Google's search page, reducing users' reasons to try competing search engines. A remedies order entered September 2, 2025 in the DOJ case expressly extended relief to Google's generative AI products, confirming that AI Overviews is an extension of Google's illegal monopoly maintenance. The April 2025 federal court finding in *United States v. Google LLC* (Ad Tech), No. 1:23-cv-00108-LKG (E.D. Va.), adjudicating Google's separate illegal monopoly over publisher ad servers and display ad exchanges, further demonstrates Google's systematic corporate strategy of serial monopolization. Plaintiff has suffered direct antitrust injury from this monopoly in the form of lost search referral traffic and lost advertising revenue.

F. CLAIM 6 — Unlawful Attempted Monopolization of Online Legal Information Publishing (Sherman Act § 2, 15 U.S.C. § 2)

6. Google is in the process of monopolizing the market for online legal information publishing in the United States. The evidence of dangerous probability of achieving monopoly includes:

a. AI Overviews already reaches 89.2% of all U.S. search users automatically, giving it greater distribution than any independent publisher could achieve;

b. AI Overviews was serving over one billion users globally by December 2024;

c. Alphabet spent more than $52 billion on AI infrastructure in 2024 alone — a sum that dwarfs the entire online legal information publishing industry;

d. Zero-click searches rose from 56% to 69% of all Google queries in the twelve months following the AI Overviews rollout (SimilarWeb, May 2025), directly displacing publisher traffic; and

e. Industry research projects 20–60% publisher traffic declines (Raptive, March 2024) and a 25% overall search volume decline by 2026 (Gartner, February 2024).

Google's specific intent to dominate AI-powered information delivery — including legal information — is demonstrated by CEO Sundar Pichai's repeated public statements that Google's AI strategy is designed to make Google the primary destination for any query.

G. CLAIM 7 — Unjust Enrichment (Hawaii Common Law)

7. Under Hawaii common law (*Durette v. Aloha Plastic Recycling, Inc.*, 105 Hawaii 490, 504 (2004)), unjust enrichment requires: (1) a benefit conferred on the defendant by the plaintiff; (2) the defendant's knowledge or appreciation of the benefit; and (3) inequitable retention of the benefit without payment.

a. Benefit: Plaintiff's original civil legal information content — produced through years of personal legal research, writing, and editorial investment — was crawled by Google and incorporated without consent into:

- LLM training datasets for Gemini and AI Overviews;
- Real-time RAG retrieval systems that generate AI Overview responses; and
- AI Overview responses that earn Google advertising revenue.

b. Knowledge: Google's July 1, 2023 Privacy Policy update expressly confirmed that Google uses crawled web content to train its AI models. Dr. Najork's July 2023 acknowledgment confirms that Google's senior researchers understand the economic value of publisher content to their AI systems.

c. Inequitable Retention: Google has paid Plaintiff nothing for any of these uses, while competing AI companies pay publishers market licensing rates for comparable rights. Google's AI Overview responses generated using Plaintiff's content simultaneously earn Google advertising revenue and divert traffic that would otherwise generate advertising revenue for Plaintiff. Google profits from Plaintiff's content while depriving Plaintiff of revenue that content would otherwise generate. Plaintiff never consented to any of these uses.

IV. RELIEF REQESTED

A. Plaintiff Theodore Haugland respectfully requests that this Court grant the following relief:

1. **Declaratory Relief:** A declaration that Defendants have violated Sections 1 and 2 of the Sherman Antitrust Act by engaging in unlawful reciprocal dealing, willful monopoly maintenance, monopoly leveraging, monopolization of general search services, and attempted monopolization of the online legal information publishing market.
2. **Treble Damages:** An award of compensatory damages for all losses to Plaintiff's business and property caused by Defendants' anticompetitive conduct — including lost advertising revenue, lost search referral traffic, and lost content licensing revenue — trebled pursuant to Section 4 of the Clayton Act, 15 U.S.C. § 15. The precise amount of damages will be established through expert economic analysis and discovery. Plaintiff avers that his losses are material, ongoing, and directly attributable to the May 14, 2024 nationwide rollout of AI Overviews.
3. **Permanent Injunction:** A permanent injunction pursuant to Section 16 of the Clayton Act, 15 U.S.C. § 26, ordering Defendants to:

a. Stop conditioning search traffic or search index placement on publishers providing content for AI training or RAG use without compensation;

b. Stop using content crawled from Plaintiff's website for LLM training or RAG grounding without a license at fair market rates;

c. Stop displaying AI Overview responses to civil law queries derived from publisher content obtained without consent or compensation; and

d. Stop retaliating against publishers who decline to provide content for AI training or RAG use.

4. **Restitution:** Restitution equal to the fair market value of the content licensing rights misappropriated by Defendants, calculated by reference to the licensing rates paid by Google's AI competitors for comparable content rights.

5. **Disgorgement:** Disgorgement of all advertising revenues earned by Defendants from AI Overview responses served using content derived from Plaintiff's website.

6. **Accounting:** An order requiring Defendants to provide a full accounting of all revenue derived from the use of content crawled from Plaintiff's website.

7. **Attorneys' Fees and Costs:** Reasonable attorneys' fees and costs pursuant to Section 4 of the Clayton Act, 15 U.S.C. § 15.

8. **Pre- and Post-Judgment Interest:** Interest on all monetary awards at the maximum rate permitted by law.

9. **Such Other Relief** as this Court deems just and proper.

B. Demand for Jury Trial

1. Plaintiff Theodore Haugland hereby demands trial by jury on all claims triable by jury in this action, pursuant to Rule 38(b) of the Federal Rules of Civil Procedure and the Seventh Amendment to the United States Constitution.

VI. CERTIFICATION AND CLOSING

B. Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint:

1. is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;

2. is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law;

3. factual contentions have evidentiary support or, if specifically, so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and

4. the complaint otherwise complies with the requirements of Rule 11;

C. I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

\` \` /Signature/___***Theodore Haugland***_____ /Date/_***July 8, 2026***___

Theodore Haugland **July 8, 2026**

Street Address: 99-009 Kalaloa St Ste D2016, Aiea, HI 96701

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