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FEDERAL ELECTION COMMISSION

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January 12, 2021

Lisa J. Stevenson  
Acting General Counsel  
Office of General Counsel  
Federal Election Commission  
1050 First Street, NE  
Washington, D.C. 20463

**MUR 7870**

*Re: Complaint Against Google, LLC. Regarding In-Kind Corporate Contributions to Biden for President*

Dear Ms. Stevenson:

This letter constitutes a formal complaint filed under 52 U.S.C. § 30109(a)(1) of the Federal Election Campaign Act ("FECA"). It is submitted on my own behalf, and not on behalf of any client or other third-party. Based upon information and belief, as set forth below and in the attached materials, I believe that Google, LLC ("Respondent") has violated FECA and the Commission's Regulations by making corporate in-kind contributions to Biden for President ("Biden"), the principal campaign committee for former Vice President Joe Biden.

Google, LLC may be found at its headquarters located at 1600 Amphitheatre Parkway, Mountain View, CA, 94043.

**I. Background**

Throughout the 2020 Presidential campaign and in the aftermath of the election, Google has engaged in a concerted effort to support and influence the election of Joe Biden as President. Although this coordination is difficult to uncover, on Biden's Innovation Policy Committee there are "at least eight people who work for Facebook, Amazon, Google and Apple, according to documents reviewed by The New York Times. Other committee members have close ties to the companies, including economists and lawyers who have advised them, and officials at think tanks funded by them."<sup>1</sup>

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<sup>1</sup> <https://www.nytimes.com/2020/08/10/technology/big-tech-biden-campaign.html>

On information and belief, Google has used its influence insidiously by altering their algorithms to suppress conservative and pro-Trump podcasts, YouTube channels, and videos. Many YouTube channels have found themselves and their reach throttled in the aftermath of the election, including prominent Catholic podcasters Taylor Marshall<sup>2</sup> and Timothy Gordon<sup>3</sup>, both of whom occasionally discuss U.S. politics, have discussed the 2020 election, and have expressed concerns over election fraud. Both have experienced a drastic reduction in reach and viewership since November 3rd.

Google and YouTube have shown a pattern of such interference, whether due to alterations of the algorithm or human intervention by employees.<sup>4</sup> On information and belief, Google has used its tools of demonetization and Restricted Mode through its subsidiary platform YouTube in order to influence the November election. Google also, on information and belief, determined whether a news source is credible or hate speech in order to further Democratic aims and elect Joe Biden.<sup>5</sup> Indeed, just as search results were biased enough to influence millions of voters in the 2016 election, on information and belief, Google's alterations of its search results have altered enough votes to constitute a campaign contribution Biden for President.<sup>6</sup> Google executives are on record as wanting to prevent a recurrence of the "Trump situation" from 2016, and on information and belief, they have taken steps to make sure such a "situation" did not recur.<sup>7</sup>

On information and belief, Google has engaged in an effort to influence the election by censoring those who cast doubt on the election results or argue there was fraud in the 2020 President election. This constituted a contribution to the Biden campaign by providing overwhelming media cover for politicians to ignore any and all evidence of fraud or other attempts to validate election results. Due to the unique American electoral system, this influence has contributed to the election of Joe Biden by influencing judges, the Electoral College, and Congress itself, all of whom play a part in electing the President to be inaugurated January 20th, 2021. *See U.S. Constitution Amendment XII.*

## II. Analysis

Federal campaign finance law prohibits corporations from making contributions to federal candidates. 52 U.S.C. § 30118(a); 11 C.F.R § 114.2(b). The term "contribution" is defined in relevant part to mean "anything of value made by any person for the purpose of influencing an

<sup>2</sup> <https://www.youtube.com/channel/UCeJGHnaPVxYr7z55VF4YmPg>

<sup>3</sup> [https://www.youtube.com/channel/UCu3jDGYr-BHurx6mNFGto\\_A](https://www.youtube.com/channel/UCu3jDGYr-BHurx6mNFGto_A)

<sup>4</sup> [http://www.bgrfirm.com/wp-content/uploads/2017/10/PRAGER\\_U-\\_v\\_GOOGLE-YOUTUBE\\_complaint\\_10-23-2017\\_FILED.pdf](http://www.bgrfirm.com/wp-content/uploads/2017/10/PRAGER_U-_v_GOOGLE-YOUTUBE_complaint_10-23-2017_FILED.pdf)

<sup>5</sup> <https://www.cnn.com/2019/08/19/trump-claims-google-manipulated-votes-after-internal-docs-leak.html>

<sup>6</sup> <https://www.judiciary.senate.gov/imo/media/doc/Epstein%20Testimony.pdf>

<sup>7</sup> <https://www.projectveritas.com/news/insider-blows-whistle-exec-reveals-google-plan-to-prevent-trump-situation-in-2020-on-hidden-cam/>



election,” and includes in-kind contributions such as services. 11 C.F.R. §§ 100.52(a) & 100.52(d)(1).

a. Respondents’ Active Media Support Constitutes a “Thing of Value.”

Google’s actions have provided a thing of value to the Biden campaign. Google has provided more media value to the Biden campaign through its altered search algorithms, search recommendations, “fact checks”, and ways it administers its monetization rules on the Google platform and its subsidiary platform of YouTube, has provided more value to the Biden campaign than any outright ads ever could. Through all these actions, Google has acted as an undercover media operative for Biden for President, which is not legitimate under U.S. election law.

b. Respondent’s Active Media Support is “For the Purpose of Influencing an Election.”

Google has openly supported Joe Biden and demonstrated hostility towards President Trump and other conservatives throughout the Trump Presidency. On information and belief, these connections demonstrate that Google’s activities have not been taken independently, but have been done in coordination with the Biden for President Campaign for the purpose of electing Joe Biden the next President of the United States.

### **III. Prayer for Relief**

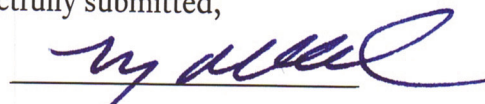
Google is a partisan actor, run by partisan Democrats, which have used their corporate resources to provide active support for Joe Biden’s campaign in violation of federal law. I therefore respectfully request that the Commission:

1. Conduct an immediate investigation into Google’s illegal in-kind contributions to the Biden campaign;
2. Find reason to believe that Google has violated 52 U.S.C. § 30118(a); 11 C.F.R § 114.2(b); and
3. Impose the maximum penalty allowed under the law.

I HEREBY DECLARE and AFFIRM, under the penalties of perjury, that the matters and facts contained herein are true and correct upon information and belief.

Respectfully submitted,

By:



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*Signed to and sworn to before me :*

