

PETITION FOR INJUNCTIVE RELIEF AND DECLARATORY JUDGMENT – META / FACEBOOK

Douglas C. Youvan

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April 22, 2024

IN THE DISTRICT COURT OF CRAWFORD COUNTY, KANSAS

Douglas C. Youvan,
Plaintiff,

v.

Meta Platforms, Inc., formerly known as Facebook, Inc.,
Defendant.

Case No. _____

PETITION FOR INJUNCTIVE RELIEF AND DECLARATORY JUDGMENT

PARTIES

1. **Plaintiff Information:** Douglas C. Youvan, an individual, residing at [Your Full Address, City, State, Zip Code], Frontenac, Kansas, 6673.
2. **Defendant Information:** Meta Platforms, Inc., a corporation organized and existing under the laws of Delaware, with its principal office at 1601 Willow Road, Menlo Park, CA 94025.

JURISDICTION AND VENUE

3. The jurisdiction of this Court is invoked pursuant to the laws governing the State of Kansas. Venue is proper in this Court because the effects of the Defendant's actions are felt within Crawford County, Kansas, affecting the local populace.

FACTUAL ALLEGATIONS

4. The Plaintiff makes the following allegations against the Defendant:

- Meta Platforms, Inc., through its operations and content moderation policies on Facebook, has systematically removed or suppressed content that is critical of Ukraine, thereby affecting the public discourse around political and social issues pertinent to the upcoming elections.
- These moderation practices have been conducted without transparency, disproportionately impacting the Plaintiff's and the public's right to free speech, especially in the context of significant electoral processes.

CAUSE OF ACTION

5. **Violation of Free Speech and Electoral Interference**

- Plaintiff claims that the Defendant's content moderation policies and practices constitute a violation of the First Amendment rights of the residents of Crawford County, as they are applied in a manner that unduly influences the political landscape.
- The actions of Meta are alleged to interfere with the electoral process by manipulating the information available to voters, thus harming the Plaintiff and the public's ability to participate in a free and fair election.

PRAYER FOR RELIEF

6. WHEREFORE, Plaintiff, Douglas C. Youvan, respectfully requests the Court:

- Issue a preliminary and permanent injunction restraining Meta Platforms, Inc. from continuing its alleged biased content moderation practices.
- Declare that the Defendant's actions in moderating content critical of Ukraine are unconstitutional under the First Amendment as applied to public discourse surrounding elections.
- Award any other relief deemed just and proper by the Court.

JURY DEMAND

7. Plaintiff demands a trial by jury on all triable issues.

RESPECTFULLY SUBMITTED,

Douglas C. Youvan
[Your Address]
Frontenac, Kansas, 6673

CERTIFICATE OF SERVICE

8. I hereby certify that on [date], a true and correct copy of the foregoing Petition was served on the Defendant, Meta Platforms, Inc., at its principal office by [method of service, e.g., certified mail, personal delivery].

[Signature Line]

Douglas C. Youvan