UNITED STATES FEDERAL COURT

DISTRICT OF OREGON

CHAL MCCOLLOUGH, ) Civil Case Number:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Plaintiff )

v. ) FIRST AMENDMENT COMPLAINT AND

PORTLAND STATE ) DEMAND

UNIVERSITY )

c/o Stephen Percy, )

ERICA GELLER of )

PORTLAND STATE )

UNIVERSITY , and )

SUSAN JEFFORDS of )

PORTLAND STATE )

UNIVERSITY )

Defendants, )

# Plaintiff’s Draft Petition

TO PORTLAND STATE UNIVERSITY c/o Stephen Percy, ERICA GELLER of PORTLAND STATE UNIVERSITY, SUSAN JEFFORDS of PORTLAND STATE UNIVERSITY:

Plaintiff CHAL MCCOLLOUGH (“Plaintiff”) complains and for causes of action alleges as follows.

# 1. Overview

# 2. Discovery

1. Plaintiff respectfully requests Discovery in this case be conducted under Oregon Rules of Civil Procedure (hereby referred to as ORCP) Rule 36(A).

# 3. Request for Disclosure

Pursuant to Rule 36(A) of the Oregon rule of Civil Procedure, within thirty days of service of this request, the information and material described in Rule 36(A) of the Oregon Rules of Civil Procedure. Plaintiff specifically requests the responding parties to produce responsive documents at the undersigned law offices within 30 days of service of this request.

## 4. Demand

I the Plaintiffs/Petitioners, CHAL MCCOLLOUGH, demand the Defendant, PORTLAND STATE UNIVERSITY, give us $10 million in compensation for damages from the unlawful deprivation of First and Fourteenth Amendment rights.

## 5. Cases

1. In **Uzuegbunam v. Preczewski, 592 U.S. 501 (2021)** the Court decreed the US Constitution is supreme in corporate towns and corporate towns are not allowed to deny it's citizens First Amendment rights.
2. In **Spokeo, 578 U. S., at 338**, no federal court has jurisdiction to enter a judgment unless it provides a remedy that can redress the plaintiff ’s injury.
3. In **New York Times v. Sullivan (1964)**, The Supreme Court decreed “against the background of a profound national commitment to the principle that debate on public issues should be uninhibited, robust, and wide-open, and that it may well include vehement, caustic, and sometimes unpleasantly sharp attacks on government and public officials.”

## 6. Statement of Points and Authorities

1. The **First Amendment** to the US Constitution commands "Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances."
2. The **Fourteenth Amendment** provides citizens right to use of a process to deprive citizens of their rights with use of clear and convincing evidence where the State has the burden of proof that the State has a compelling interest in abridging the Constitutional rights and that the intervention is absolutely necessary to prevent injury to another’s rights.

## Arguments

A. BIG TECH consists of a network of platforms that are not protected under 47 US Code § 230.  
B. BIG TECH has unlawfully censored INPC'S news that Chinese government spies and other hostile State actors have infiltrated Silicon Valley and they have a network that reaches up to the White House.  
C. B. BIG TECH is a Silicon Valley Monopoly.­­­­­  
D. BIG TECH is a community of families including children under age 13 and is too large to moderate.  
E. BIG TECH takes on national security and election official roles.  
F. BIG TECH is a corporate town.  
G. BIG TECH censors on behalf of Democrat Politicians to censor Republicans and INPC and this is an illegal campaign contribution.  
H. BIG TECH banned former US President Donald Trump to influence US politics.  
I. BIG TECH unlawfully bans INPC for criticizing religion and politicians.  
J. BIG TECH unlawful censored alleged COVID and Medical misinformation.  
K. BIG TECH unlawful censored news, commentary, and critique of ballot harvesting and related election fraud.  
L. BIG TECH censors US Citizen's speech on the behalf of foreigners and hostile foreign governments like China.  
M. BIG TECH profited from enabling BLM riots and scam fundraisers on their platform.  
N. BIG TECH profits from and props up Big Media who gas light with false claims that prevents citizens from getting fair trials.  
O. BIG TECH fortified Biden and suppressed Trump in the 2020 Election in a 'shadow campaign' of election engineering.  
P. BIG TECH biases search results in favor of Big Media and does not classify INPC as real news.  
Q. Wikipedia is one of the primary sources of defamation and the Wikipedia Foundation has banned INPC publishing false facts maliciously and recklessly that INDIE NEWS AND POLTICAL COMMENTARY that we’re Nazis for adding proof of QAnon and Great Replacement..

R. BIG TECH has defamed and caused psychological and emotional injuries to INPC members as described in each member's "Declaration in Support of Petition".  
S. BIG TECH caused $1.6 billion in tort-actionable damages to INPC.  
T. This Court has jurisdiction over the questions of law at hand and this is the most suitable Court to hear these questions of Federal Law:

1. Is FAR-LEFT UNIVERSITIES required to use clear and convincing evidence to deprive students of their First Amendment rights?

### A. Defendants unlawfully deprived Plantiff of his First Amendment Rights without use of Clear and Convincing Evidence.

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### Defendants unlawfully permanently banned Plantiff.

### T. This Court has jurisdiction over these questions of law at hand and this is the most suitable Court to hear these questions of Federal Law.

BIG TECH operates and is controlled from Silicon Valley California, INPC are lawful residents of the United States, and both are subject to the laws of the United States of America and this Court has original jurisdiction in these questions of law. INPC has filed this action within the time allowed by US Law and the question of law persists in the future and is a matter of National Security that requires the Court to take immediate action by issues the requested orders. The Questions of law that we are respectfully requesting the Court to decree an answer to answer are:

1. Has BIG TECH unlawfully defamed INPC?
2. Does BIG TECH have a monopoly over information service providers of election related information distribution?
3. Is BIG TECH a corporate town?
4. Is BIG TECH's use of sophisticated AI algorithms to modify the public's behavior through psychological manipulation an illegal campaign contribution to the Democrats?
5. Is BIG TECH's use of sophisticated AI algorithms to modify the public's behavior through psychological manipulation protected under 47 US Code § 230?
6. Has BIG TECH unlawfully censored INPC using 47 US Code § 230 on behalf of Democrats?
7. Has BIG TECH engaged in a cover-up of Great Replacement and QAnon in order engineer election outcomes to ensure Democrats control Congress and the White House?
8. Is BIG TECH liable for damages to INPC?

### Jury Trial

Plaintiff demands a jury trial.

**THEREFORE,** we respectfully request the Court to:

1. Declare BIG TECH is a de facto election official and virtual corporate town subject to the United States Constitution, State Constitutions, and local Municipal Charters.
2. Declare foreign BIG TECH to be foreign State election officials and virtual corporate towns subject to their local Governments who operate under the United States within our Sovreign territory and territories of influence and vice-versa.
3. Order BIG TECH to restrain from all unlawful censorship of all netzines foreign and domestic.
4. Order BIG TECH to pay INPC $1.6 billion in compensation for tort liabilities from damages.
5. Order BIG TECH to be broken up into one platform per unique independent company that operates in compliance with US antitrust laws.
6. Order BIG TECH to cease and desist election engineering.
7. Order BIG TECH turn over all election related materials to the US Federal Government.
8. Order BIG TECH be held liable for attorney's fees.
9. Issue any other relief to which petitioner may be entitled.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct and that this Petition was placed in the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ on \_\_\_\_\_\_\_\_\_\_\_\_, 2021.

Respectfully submitted \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 2021.

The class of people INPC:

x\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  
Petitioner Chal McCollough  
Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 2021