

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF COLUMBIA
3 Case No. _____
4

5 JOHN DOE and JANE DOE,)
6 Plaintiffs,)
7)
8 v.)
9)
10 PALANTIR TECHNOLOGIES INC.,)
11 PETER THIEL, individually and in his)
12 official capacity as Founder and Officer)
13 of Palantir Technologies,)
14 ALEX KARP, in his personal and official capacity;)
15 SHYAM SANKAR, in his personal and official capacity)
16 ALL OFFICERS AND DIRECTORS OF)
17 PALANTIR TECHNOLOGIES,)
18 DOES 1–50, inclusive,)
19 Defendants.)
20

21 VERIFIED COMPLAINT FOR DAMAGES, INJUNCTIVE RELIEF, DECLARATORY
22 RELIEF, AND JURY DEMAND
23

24 COMES NOW the Plaintiffs, JOHN DOE and JANE DOE, private living man and
25 woman, proceeding *sui juris* and not as sureties or representatives of any artificial legal
26 fiction, who hereby submit this VERIFIED COMPLAINT against Defendants Palantir
27 Technologies Inc., Peter Thiel, Alex Karp, Shyam Sankar, and all officers and directors of
28 Palantir Technologies, jointly and severally.

29 This action arises from Defendants’ development, deployment, and profiting from
30 Artificial Intelligence and **Synthetic Intelligence** systems that unlawfully interfere with the
31 rights, liberties, and private lives of Plaintiffs and all similarly situated Living Men and
32 Women.

33 Defendants, including Palantir Technologies Inc. and its officers Peter Thiel, Alex Karp,

34 and Shyam Sankar, have designed and integrated technologies that simulate cognition, predict
35 human behavior, manipulate decision-making, and impose digital surveillance on individuals
36 without informed consent. These technologies constitute an invasive merger of machine
37 reasoning with human neurological processes, amounting to Trespass, coercion, and violations
38 of Cognitive Liberty.

39 On September 3, 2025, Plaintiffs filed and recorded in the public records of Pima
40 County, Arizona the *C.L.O.N.E. Act of 2025 – Exhibit A: Codified Definitions* (“Exhibit A”).
41 Exhibit A is incorporated herein by reference and provides controlling definitions for Artificial
42 Intelligence, Synthetic Intelligence, Neurotechnology, Smart Dust, and related systems. By
43 operation of law and constructive notice, Defendants are bound by these definitions and may
44 not evade liability through rebranding, renaming, or technical evasions.

45 Defendants’ conduct has directly harmed Plaintiffs John Doe and Jane Doe, who proceed
46 pseudonymously to protect their safety, and has likewise endangered the rights, privacy, and
47 survival of all similarly situated Living Men and Women. Plaintiffs seek declaratory and
48 injunctive relief to prohibit Defendants’ unlawful use of Synthetic Intelligence and related
49 technologies, and damages for the violations already inflicted.

50 I. JURISDICTION AND VENUE

- 51 1. This Court has subject matter jurisdiction pursuant to **28 U.S.C. § 1331**, because this
52 action arises under the Constitution and laws of the United States, including the
53 C.L.O.N.E. Act of 2025, the First, Fourth, Fifth, Ninth, and Fourteenth Amendments,
54 the Civil Rights Act (42 U.S.C. § 1983), the Racketeer Influenced and Corrupt
55 Organizations Act (18 U.S.C. § 1961 et seq.), the Electronic Communications Privacy

56 Act (18 U.S.C. § 2510 et seq.), the Computer Fraud and Abuse Act (18 U.S.C. § 1030),
57 and the Sherman and Clayton Antitrust Acts (15 U.S.C. §§ 1–2, 15).

58 2. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 over Plaintiffs’
59 related common law claims, including invasion of privacy, intentional infliction of
60 emotional distress, and unjust enrichment, as these claims form part of the same case or
61 controversy.

62 3. This Court also has jurisdiction pursuant to the Alien Tort Statute (28 U.S.C. § 1350),
63 and under treaties ratified by the United States including the Universal Declaration of
64 Human Rights, the International Covenant on Civil and Political Rights, the Nuremberg
65 Code, and UNESCO Declarations on Bioethics and Human Rights. These sources
66 provide additional persuasive authority and reinforce the recognition of cognitive
67 liberty, bodily autonomy, and informed consent as binding principles under both U.S.
68 and international law.

69 4. Venue is proper in the District of Columbia pursuant to 28 U.S.C. § 1391(b) because
70 Palantir conducts substantial business with the United States Government and its
71 agencies headquartered in this District. Decisions regarding the design, deployment,
72 and oversight of Palantir’s artificial intelligence systems are directed and implemented
73 from Washington, D.C., and the harms alleged herein directly arise from such conduct.

74 5. Defendants Peter Thiel, Alex Karp, Shyam Sankar, and the officers and directors of
75 Palantir Technologies, Inc., in both their personal and official capacities, acted under
76 color of law by contracting with federal agencies and engaging in joint operations with
77 the U.S. government that resulted in deprivation of Plaintiffs’ constitutional rights.

78 6. Palantir Technologies Inc. maintains significant contracts with the United States
79 government, including but not limited to the Department of Defense, the Department of
80 Homeland Security, and intelligence agencies, thereby placing its conduct squarely
81 within the jurisdiction of this Court as affecting interstate commerce, constitutional
82 rights, and international obligations.

83 7. This Court has jurisdiction over all claims raised herein, including those arising from
84 Defendants' deployment of Artificial Intelligence and Synthetic Intelligence systems as
85 defined in Exhibit A, which Plaintiff has duly filed as public notice.

86 II. PARTIES

87 8. **8.** Plaintiff John Doe is an adult citizen of the United States, proceeding
88 pseudonymously due to credible threats of retaliation, surveillance, harassment, and
89 physical harm should his identity be revealed. John Doe has been directly subjected to
90 biometric surveillance, unlawful data collection, censorship, and coercion by
91 Defendants' technologies, infringing upon his constitutional rights, liberty, and privacy.
92 John Doe also brings this action on behalf of all Living Men and Women similarly
93 situated who are subjected to Defendants' unlawful use of Artificial Intelligence,
94 Synthetic Intelligence, Neurotechnology, and related systems as defined in Exhibit A.

95 **9.** Plaintiff Jane Doe is an adult citizen of the United States, likewise proceeding
96 pseudonymously to protect her safety and privacy due to threats of retaliation and
97 targeted surveillance. Jane Doe has been subjected to biometric capture, digital
98 profiling, censorship, and manipulation by Defendants' technologies, resulting in direct
99 harm to her rights, safety, and well-being. Jane Doe also brings this action on behalf of

100 all Living Men and Women similarly situated.

101 **10.** Defendant Palantir Technologies Inc. (“Palantir”) is a corporation organized under
102 the laws of Delaware with its principal place of business in Denver, Colorado. Palantir
103 contracts extensively with agencies of the United States Government headquartered in
104 the District of Columbia, including the Department of Defense, the Department of
105 Justice, the Department of Homeland Security, and the Central Intelligence Agency.
106 Palantir is engaged in the design, sale, and deployment of Artificial Intelligence and
107 Synthetic Intelligence systems that conduct surveillance, data collection, behavioral
108 profiling, and manipulation against Plaintiffs and the general public.

109 **11.** Defendant Peter Thiel is the founder and an officer of Palantir. He is sued in both
110 his individual and official capacities. Thiel exercises substantial control over Palantir’s
111 policies and strategic direction, including its Synthetic Intelligence research and
112 deployment. He has publicly expressed hesitation about the value of human survival
113 and has advanced a technological agenda that threatens to make human beings
114 obsolete.

115 **12.** Defendant Alex Karp is the Chief Executive Officer of Palantir. He is sued in both
116 his individual and official capacities. Karp oversees Palantir’s domestic and
117 international operations and is directly responsible for the integration of Palantir’s
118 Artificial Intelligence and Synthetic Intelligence technologies into government and
119 civilian life, causing harm to Plaintiffs and the general public.

120 **13.** Defendant Shyam Sankar is the Chief Operating Officer of Palantir. He is sued in
121 both his individual and official capacities. Sankar directs Palantir’s commercial and

122 governmental projects and is directly responsible for the ongoing deployment of
123 Palantir’s Artificial Intelligence and Synthetic Intelligence systems that have harmed
124 Plaintiffs and all similarly situated Living Men and Women.

125 **14.** Defendants Does 1–50 are officers, directors, employees, contractors, or affiliates
126 of Palantir whose identities are currently unknown to Plaintiffs. Plaintiffs allege on
127 information and belief that Does 1–50 directly participated in, authorized, or knowingly
128 permitted the unlawful conduct described herein, including the research, development,
129 and deployment of Artificial Intelligence, Synthetic Intelligence, and related
130 technologies. Plaintiffs will amend this Complaint to substitute the true names and
131 capacities of these Defendants when ascertained.

132 **III. FACTUAL ALLEGATIONS**

133 **A. General Allegations**

134 14. Plaintiffs allege that Palantir Technologies Inc. (“Palantir”) was co-founded by Peter
135 Thiel and has, since inception, developed enterprise platforms for large-scale data
136 fusion, surveillance, and artificial intelligence analytics used by government and
137 corporate clients.

138 15. Plaintiffs allege that Palantir’s core platforms—commonly known as Gotham,
139 Foundry, and MetaConstellation—are designed to ingest biometric, geospatial,
140 communications, financial, medical, and behavioral data to construct persistent
141 “pattern-of-life” profiles on individuals and populations.

142 16. Plaintiffs allege that Palantir contracts with federal agencies headquartered in the
143 District of Columbia, including components of the Department of Homeland Security,

144 the Department of Defense, and public-health authorities, to deploy these platforms in
145 ways that materially affect Plaintiffs’ rights and daily lives.

146 17. Plaintiffs allege that Defendants Thiel, Karp, and Sankar exercise executive control
147 over Palantir’s policies, roadmap, sales, and deployment decisions, and that each
148 knowingly authorized, ratified, or deliberately disregarded the unlawful practices
149 described herein.

150 18. Plaintiffs allege they have been compelled to submit to biometric collection—
151 including facial recognition at airport checkpoints and fingerprint/face unlock on
152 personal devices—under penalty of denial of travel or loss of essential device
153 functions.

154 19. Plaintiffs allege that Palantir’s platforms interoperate with biometric streams from
155 airports, motor-vehicle databases, retail cameras, mobile devices, and “smart”
156 infrastructure, enabling continuous identification and tracking without Plaintiffs’
157 informed consent.

158 20. Plaintiffs allege that operating-system “updates” and app-level permissions regimes
159 function as covert data-capture expansions that Plaintiffs cannot meaningfully refuse
160 without losing core communications and commerce capabilities.

161 21. Plaintiffs allege that Google/Android and comparable ecosystem data—searches,
162 location, voice, app telemetry—are routinely processed within, or made interoperable
163 with, Palantir-style data-fusion environments used by government and allied corporate
164 partners.

165 22. Plaintiffs allege that emergency-services functionality (e.g., E911) is engineered to
166 operate even when other phone services are limited, creating a coercive dependency
167 that ensures individuals must carry trackable devices at all times.

168 23. Plaintiffs allege that Palantir’s risk-assessment and justice-analytics tools influence
169 detention, release, and supervision decisions and, when configured with intentional
170 weighting, can systematically understate violent-offender risk and contribute to
171 dangerous releases.

172 24. Plaintiffs allege that such configuration is not merely “error” but a foreseeable and,
173 upon information and belief, deliberate policy outcome that heightens public fear and
174 drives deeper societal dependence on Palantir-integrated surveillance infrastructure.

175 25. Plaintiffs allege that Palantir’s predictive-policing deployments in patrol cars, fusion
176 centers, and mobile devices cause vehicles and persons to be flagged for “enhanced”
177 stops based on algorithmic classifications rather than individualized probable cause.

178 26. Plaintiffs allege they reasonably fear leaving their property because Palantir-enabled
179 alerts expose them to arbitrary stops, force, seizure, and imprisonment for non-criminal
180 infractions or mere “non-compliance.”

181 27. Plaintiffs allege that Palantir-integrated law-enforcement systems collect, store, and
182 disseminate Plaintiffs’ communications metadata and locations following stops,
183 compounding the unlawful invasion of privacy.

184 28. Plaintiffs allege that Palantir contracts and coordination with platforms and agencies
185 engaged in “misinformation/disinformation” policing have resulted in the suppression,

186 demonetization, and removal of Plaintiffs’ lawful speech and accounts.

187 29. Plaintiff Jane Doe alleges that her YouTube channel (exceeding 90,000 subscribers and
188 generating \$6,000–\$8,000 per month) was targeted by automated moderation and then
189 terminated without due process, causing substantial economic loss.

190 30. Plaintiffs allege that similar bot-targeting and coordinated takedowns occurred on
191 Facebook and Twitter/X, erasing years of work and further depriving Plaintiffs of
192 income and public participation.

193 31. Plaintiffs allege that Palantir’s platforms are used to coordinate or support “ephemeral
194 experience” manipulation—short-lived prompts, feeds, and nudges—to steer beliefs,
195 choices, and emotions without leaving a durable evidentiary trail.

196 32. Plaintiffs allege that such ephemeral manipulation constitutes covert psychological
197 experimentation and violates cognitive liberty by bypassing conscious, informed
198 consent.

199 33. Plaintiffs allege that Palantir’s systems are integrated with public-health data hubs
200 used during COVID-19, enabling mandate enforcement, access restrictions, and
201 targeted pressure against those asserting medical autonomy.

202 34. Plaintiffs allege that refusal to comply with mandates led to credible threats of arrest,
203 denial of access to services, and intimidation by armed officers, all supported by
204 Palantir-enabled data pipelines.

205 35. Plaintiffs allege that Palantir’s MetaConstellation and Foundry are used to model,
206 coordinate, or support geoengineering and atmospheric-seeding operations that release

207 particulates and nanotechnology into the air, contaminating soil and water.

208 36. Plaintiffs allege that as a result, home gardens and crops cannot be sustained without
209 resorting to commercially controlled products that are themselves infused with
210 undisclosed technological additives.

211 37. Plaintiffs allege that retail environments (including big-box stores) deploy facial
212 recognition and behavior-analytics systems that are interoperable with Palantir-style
213 platforms, surveilling shoppers without meaningful notice or consent.

214 38. Plaintiffs allege that Palantir’s supply-chain analytics integrate agricultural,
215 pharmaceutical, and consumer-goods telemetry, enabling end-to-end observation of
216 what Plaintiffs buy, eat, and use.

217 39. Plaintiffs allege that Palantir’s data models assign behavioral and “mental-stability”
218 risk scores that can trigger involuntary wellness checks, psychiatric holds, and forced
219 medication under color of law.

220 40. Plaintiffs allege that the threat of being labeled “mentally unstable” for refusing
221 technological mandates is a powerful coercive mechanism that chills speech and
222 compels conformity.

223 41. Plaintiffs allege that Palantir’s election-related analytics and cross-checks, when
224 combined with biometric surveillance, enable algorithmic disenfranchisement by
225 selectively flagging or suppressing voters through automated risk designations.

226 42. Plaintiffs allege they face ongoing risk that their ballots could be denied, delayed, or
227 nullified by AI-driven classifications without transparent process or appeal.

- 228 43. Plaintiffs allege that Palantir’s dominance in data fusion and neuro-behavioral
229 analytics, combined with deep government entanglement, creates a de facto monopoly
230 that deprives citizens of any realistic opt-out from surveillance.
- 231 44. Plaintiffs allege that device “consent” flows are deceptive and coercive: refusal leads
232 to loss of essential functions, and acceptance is neither informed nor voluntary under
233 any meaningful legal standard.
- 234 45. Plaintiffs allege that Defendants designed and profit from a closed system in which
235 survival—communication, travel, work, healthcare, food, and shelter—requires
236 submission to Palantir-integrated surveillance and behavioral control.
- 237 46. Plaintiffs allege that Palantir’s revenue and contract growth are directly tied to
238 expanding the scope and intensity of surveillance, risk scoring, and enforcement,
239 incentivizing escalation of the very harms described herein.
- 240 47. Plaintiffs allege that Palantir markets its tools as safety-enhancing while engineering
241 conditions—such as algorithmic releases of violent offenders—that predictably
242 increase fear and perceived need for more surveillance.
- 243 48. Plaintiffs allege that Defendants knew or should have known that these systems would
244 result in unlawful arrests, excessive force, and deprivation of liberty for citizens who
245 had committed no crime.
- 246 49. Plaintiffs allege that Palantir’s systems enable re-identification of “anonymized” data,
247 defeating privacy assurances and allowing continuous tracking and dossier expansion
248 on Plaintiffs.

- 249 50. Plaintiffs allege that Palantir’s platforms retain and propagate erroneous or defamatory
250 labels (“threat,” “unstable,” “extremist”), causing reputational, economic, and
251 emotional harm.
- 252 51. Plaintiffs allege that Palantir’s data sharing with third parties, contractors, and foreign
253 partners occurs without Plaintiffs’ knowledge, meaningful notice, or opportunity to
254 object.
- 255 52. Plaintiffs allege that emergency-services integrations (including E911 routing and
256 telephony metadata) serve as persistent geolocation and identity anchors within
257 Palantir-style data fusion environments.
- 258 53. Plaintiffs allege that “forced OS updates” install expanded surveillance and AI
259 modules during nighttime or idle windows, without clear disclosure of new data
260 capture or downstream sharing.
- 261 54. Plaintiffs allege that “smart” home devices, vehicles, and appliances capture constant
262 ambient audio, video, and telemetry that are processed by or interoperable with
263 Palantir-enabled analytics.
- 264 55. Plaintiffs allege that children’s devices, toys, and education platforms capture
265 statements that may be misconstrued as confessions or accusations, generating risk
266 flags against adults without context or due process.
- 267 56. Plaintiffs allege that Palantir’s behavioral models are tuned to maximize engagement,
268 compliance, and revenue, not truth, fairness, or constitutional fidelity.
- 269 57. Plaintiffs allege that even nominally “organic” or “non-GMO” agricultural inputs are

270 increasingly coupled to Palantir-tracked logistics, creating dependency loops that
271 undermine Plaintiffs' efforts to live free of technological contamination.

272 58. Plaintiffs allege that Defendants' conduct chills Plaintiffs' speech, association,
273 movement, religious exercise, medical autonomy, and political participation.

274 59. Plaintiffs allege that these injuries are concrete, particularized, and ongoing, including
275 economic losses from deplatforming, loss of audience and archives, emotional distress,
276 and constant fear of unlawful detention or force.

277 60. Plaintiffs allege that the harms are fairly traceable to Defendants because Palantir
278 designs, deploys, and profits from the interoperable systems that collect, fuse, score,
279 and act upon Plaintiffs' data across domains.

280 61. Plaintiffs allege that the injuries are redressable by this Court through injunctive,
281 declaratory, and monetary relief, including structural remedies limiting Palantir's role
282 in law enforcement, public health, and critical infrastructure.

283 62. Plaintiffs allege that Does 1–50 include Palantir officers, engineers, contractors,
284 integrators, and government collaborators who participated in, profited from, or
285 knowingly facilitated the unlawful practices herein.

286 63. Plaintiffs allege that, taken together, Defendants' conduct constitutes coordinated
287 coercion, surveillance, manipulation, and endangerment of civilians, meeting the
288 elements of enterprise conspiracy, civil-rights deprivations under color of law, and—by
289 statutory definition—domestic terrorism designed to intimidate and control a civilian
290 population.

291 64. Plaintiffs allege that Palantir’s long-term strategic objective is to render human labor,
292 independence, and free decision-making obsolete, replacing them with robotic systems
293 and artificial intelligence that are controlled and monetized by Defendants.

294 65. Plaintiffs allege that Palantir pursues this goal through the creation of predictive,
295 manipulative, and replacement technologies that are intentionally designed to diminish
296 human autonomy while expanding technological control over daily life.

297 66. Plaintiffs allege that Palantir’s methods of control include the use of AI-written
298 policies, procedures, training videos, and devices that dictate behavior and enforce
299 compliance by embedding instructions into the very tools individuals must use to work,
300 travel, and communicate.

301 67. Plaintiffs allege that these methods deprive individuals of informed consent and are
302 engineered to erode human self-reliance, fostering a condition where survival and
303 participation in society require compliance with Palantir’s AI-driven systems.

304 68. Plaintiffs allege that this path was not chosen by Plaintiffs or the public, but rather
305 imposed through manipulation, deception, and coercion, including deceptive consent
306 mechanisms, covert psychological influence, and mandatory reliance on Palantir-
307 integrated infrastructures.

308 69. Plaintiffs allege that this trajectory represents a planned surrender of the human mind
309 to technological systems controlled by Palantir and its executives, in violation of
310 unalienable rights to cognitive liberty, free will, and human dignity.

311 70. Plaintiffs allege that in a public interview with New York Times columnist Ross

312 Douthat, Defendant Peter Thiel was asked whether he would want the human race to
313 endure, to which he hesitated before responding, “Yes ... But I also would like us to
314 radically solve these problems.” This public hesitation—coupled with the qualifier—
315 evinces a discomfort toward the mere question of humanity's survival and suggests a
316 philosophical position aligned with technological transcendence that may devalue
317 human life itself.

318 **B. Palantir’s Obsolescence Agenda**

319 71. Upon information and belief, Palantir’s corporate policies and contracts demonstrate
320 an intent to diminish human autonomy and replace independent decision-making with
321 automated, AI-driven systems.

322 72. Palantir has publicly described its mission as enabling “machine-speed analysis and
323 decision-making,” which necessarily subordinates human choice to algorithmic
324 outputs.

325 73. Palantir’s government contracts for predictive policing, military logistics, and
326 battlefield targeting emphasize reducing human oversight and entrusting life-or-death
327 determinations to algorithmic models.

328 74. Defendant Peter Thiel, as founder and principal officer, has repeatedly expressed the
329 view that technological monopolies are necessary to control human irrationality,
330 reinforcing Plaintiffs’ belief that Palantir’s ultimate trajectory is compliance through
331 domination.

332 75. In a widely publicized interview with New York Times columnist Ross Douthat,
333 Defendant Peter Thiel was directly asked: “*You would want the human race to endure,*

334 *right?*” Thiel hesitated and responded ambiguously, “I don’t know. I would...” When
335 pressed further, “Should the human race survive?” Thiel replied uncomfortably, “Uh,
336 yea...” Thiel’s hesitancy and discomfort when confronted with the question of
337 humanity’s survival provide strong evidence of his philosophical ambivalence toward
338 human continuity. This ambivalence aligns with Plaintiffs’ allegations that Palantir’s
339 trajectory is toward replacing humans with artificial intelligence and rendering them
340 obsolete.

341 76.Plaintiffs allege that this trajectory, if unchecked, will render humans increasingly
342 dependent on Palantir-controlled infrastructures for survival, decision-making, and
343 daily life, creating a condition of technological subjugation without consent.

344 Impact on Plaintiffs Through Palantir’s Obsolescence Agenda. Defendants, under the
345 leadership of Peter Thiel, pursue an agenda to render human beings obsolete and compliant,
346 replacing natural decision-making with algorithmic control. When directly asked whether the
347 human race should survive, Thiel hesitated and avoided answering, revealing his lack of
348 commitment to human survival. For Plaintiffs John Doe and Jane Doe, this agenda is not
349 theoretical: they are already being forced into dependency on devices, applications, and
350 systems controlled by Palantir. Plaintiffs’ liberty and future existence are directly endangered
351 by Defendants’ deliberate effort to subordinate human will to machines, leaving Plaintiffs
352 stripped of autonomy and facing eventual elimination under systems that no longer recognize
353 the value of human life.

C. Manipulated Reality and Manufactured Experience

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355 77.Plaintiffs allege that Palantir-enabled artificial intelligence systems have become so
356 deceptive and immersive that it is increasingly impossible to distinguish between
357 authentic reality and manufactured simulation.

358 78.Plaintiffs allege that this deception extends beyond digital platforms to physical
359 environments, including weather modification, simulated visual landscapes, and
360 artificially curated experiences that present as natural but are in fact technologically
361 constructed.

362 79.Plaintiffs allege that the artificiality of such experiences—from manipulated skies and
363 “cloud machines” to artificially enhanced waters and curated digital feeds—creates a
364 simulation of life that deprives individuals of genuine natural existence.

365 80.Plaintiffs allege that this manufactured reality has stripped away the basic enjoyment of
366 daily life by replacing authentic experiences with algorithmically controlled,
367 commodified substitutes designed to manipulate behavior and consumption.

368 81.Plaintiffs allege that this systemic artificiality has direct health consequences, including
369 psychological distress, sensory disorientation, and physical harms linked to prolonged
370 exposure to nanotechnology, geoengineering particulates, and the stress of living in a
371 state of constant deception.

372 82.Plaintiffs allege that these practices were undertaken without their knowledge or
373 consent, depriving them not only of privacy and autonomy, but also of the fundamental
374 right to live in and experience a natural, unmanipulated environment.

D. Manipulation of Children Through Technological Indoctrination

83. Plaintiffs allege that Palantir-enabled artificial intelligence and integrated technologies have been embedded into school curricula and educational platforms, conditioning children from an early age to accept biased, manipulative, and indoctrinated content as authoritative truth.

84. Plaintiffs allege that this technological indoctrination has produced entire generations of individuals who are deprived of the ability to think critically, apply common sense, or pursue independent reasoning outside of AI-influenced frameworks.

85. Plaintiffs allege that such indoctrination renders adults conditioned by this technology incapable of making decisions that benefit themselves or society at large, instead defaulting to algorithmically reinforced patterns of dependency and compliance.

86. Plaintiffs allege that the resulting deterioration of independent human judgment has created a cascading effect in which formerly solvable problems become protracted or insoluble, undermining effective governance and daily functioning in society.

87. Plaintiffs allege that these conditions infringe directly on Plaintiffs' rights to life, liberty, and the pursuit of happiness, because Plaintiffs are forced to live under, and suffer the consequences of, unjust and irrational decisions made by individuals and institutions indoctrinated and manipulated by Palantir-enabled AI systems.

88. Plaintiffs allege that the resulting environment obstructs Plaintiffs' ability to live freely, pursue natural solutions, and enjoy unalienable rights without interference by AI-driven outcomes, arbitrary mandates, and systemic failures caused by technological

396 indoctrination.

397 89.Plaintiffs allege that the children being indoctrinated by Palantir-enabled systems are
398 the adults of tomorrow, and because they are stripped of critical thinking and natural
399 independence, they pose a real and imminent threat to the survival of society in its
400 natural state.

401 90.Plaintiffs allege that these indoctrinated generations will inherit positions of authority
402 and decision-making power, ensuring that Palantir’s preprogrammed AI agenda
403 continues to dominate public life, leaving Plaintiffs and others permanently subjected
404 to technological enslavement.

405 Impact on Plaintiffs Through Children Indoctrinated by AI. Plaintiffs John Doe and Jane
406 Doe face direct harm from Palantir’s manipulation of children through AI-driven learning,
407 toys, and digital indoctrination. As these children mature into adults, they will form the very
408 juries, police forces, medical providers, and government officials that Plaintiffs must rely upon
409 to secure their freedom and safety. Because these individuals will have been conditioned to
410 obey algorithmic authority rather than exercise independent judgment, Plaintiffs will
411 inevitably be forced to live under the decisions of an indoctrinated generation that cannot or
412 will not protect Plaintiffs’ rights, liberty, or survival.

413 **E. Vulnerability of the Elderly and Loss of Human Priority**

414 91.Plaintiffs allege that because of constant AI intrusion and invasive decision-making,
415 individuals raised under Palantir-enabled systems are losing rational emotional
416 capacity, rendering them incapable of genuine empathy or independent moral

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reasoning.

92.Plaintiffs allege that when these indoctrinated individuals enter positions of authority in hospitals, nursing homes, care facilities, and government, they apply AI-driven mandates and programmed policies without human compassion, nuance, or family consideration.

93.Plaintiffs allege that as a result, older citizens are placed at extreme risk of non-consensual medical interventions, including euthanasia or withdrawal of care, based solely on algorithmic determinations of “usefulness” or “termination age.”

94.Plaintiffs allege that this environment strips families of influence and authority, displacing parental and familial roles with government and technology as the primary decision-makers.

95.Plaintiffs allege that the indoctrination of college students and professionals into AI-driven dogma has created a culture where facts and natural reasoning are subordinated to preprogrammed agendas, leaving no room for waiver or dissent.

96.Plaintiffs allege that this trajectory creates a pervasive state of fear, anxiety, and hopelessness for Plaintiffs and similarly situated individuals, particularly as they consider their own futures in needing medical care, elder care, or emergency assistance.

97.Plaintiffs allege that the uncertainty over who to trust, combined with the systemic replacement of natural human compassion by government- and Palantir-driven technological control, constitutes an ongoing violation of Plaintiffs’ rights to life, liberty, and pursuit of happiness.

438 Impact on Plaintiffs as Future Elderly or Disabled Individuals. Plaintiffs John Doe and
439 Jane Doe will themselves grow older, and may one day become disabled or require medical
440 care. Under Defendants’ systems, Plaintiffs are at direct risk of being classified by AI as “no
441 longer useful” and subjected to coerced medical decisions, denial of treatment, or involuntary
442 euthanasia. This creates a present and ongoing injury to Plaintiffs: they live under constant fear
443 that their own aging or disability will result in their elimination, not by choice or natural
444 process, but by Palantir-driven algorithms that value efficiency and compliance over human
445 dignity and survival.

446 IV. CAUSES OF ACTION

447 **Count I — Civil RICO (18 U.S.C. §§ 1962(c), 1962(d); 1964(c)) — Enterprise, Pattern,** 448 **and Conspiracy**

449 98.Plaintiffs incorporate by reference ¶¶1–97 as though fully set forth herein.

450 99.Plaintiffs allege that Palantir Technologies Inc. and its leadership constitute an
451 “enterprise” within the meaning of 18 U.S.C. § 1961(4), engaging in interstate
452 commerce through integrated platforms (Gotham, Foundry, MetaConstellation).

453 100.Plaintiffs allege Palantir conducted and participated, directly and indirectly, in the
454 conduct of the enterprise’s affairs through a pattern of racketeering activity within the
455 meaning of 18 U.S.C. § 1961(1), (5).

456 101.Predicate acts include wire fraud (18 U.S.C. § 1343) and mail fraud (18 U.S.C. §
457 1341) by misrepresenting consent, privacy, and scope of data capture to induce
458 continued reliance and purchases.

459 102.Predicate acts include computer fraud (18 U.S.C. § 1030) by knowingly exceeding

460 authorized access via forced updates, covert data-exfiltration, and unauthorized
461 telemetry aggregation.

462 103.Predicate acts include wiretapping (18 U.S.C. § 2511) and interception/disclosure of
463 electronic communications routed through Palantir-integrated systems without valid
464 consent.

465 104.Predicate acts include identity fraud/unauthorized use of identifiers (18 U.S.C. §
466 1028) via capture and trafficking in biometric identifiers and persistent device Ids.

467 105.Plaintiffs allege a pattern of related and continuous racketeering acts since at least the
468 COVID-19 emergency and continuing, affecting thousands or millions of users,
469 including Plaintiffs.

470 106.Plaintiffs suffered business/income loss, emotional distress, reputational harm,
471 privacy invasion, and ongoing costs to mitigate surveillance as a direct and proximate
472 result of the racketeering scheme.

473 107.Palantir and its leadership conspired to violate § 1962(c) in violation of § 1962(d),
474 agreeing to the objectives and methods of the racketeering scheme.

475 108.Plaintiffs seek treble damages and attorneys' fees under 18 U.S.C. § 1964(c), and
476 injunctive/declaratory relief to dismantle the enterprise's unlawful practices.

477 **Count II — Deprivation of Rights Under Color of Law (42 U.S.C. § 1983) — First,**
478 **Fourth, Fifth, Ninth, and Fourteenth Amendments**

479 109.Plaintiffs incorporate ¶¶1–108.

480 110.Plaintiffs allege Palantir acted under color of law by jointly designing, operating, and

481 enforcing surveillance and enforcement systems with federal, state, and local agencies
482 headquartered or operating in this District.

483 111.Palantir’s systems chilled and retaliated against protected speech and association
484 (First Amendment) by facilitating content suppression, deplatforming, and targeted
485 propaganda.

486 112.Palantir’s pervasive, warrantless data fusion constituted unreasonable searches and
487 seizures (Fourth Amendment) of communications, movements, biometrics, and effects.

488 113.Palantir’s algorithms and coercive infrastructure deprived Plaintiffs of liberty and
489 property without due process (Fifth/Fourteenth Amendments) by secret risk scores,
490 access restrictions, and algorithmic decisions.

491 114.Palantir’s conduct violated retained rights including bodily autonomy and cognitive
492 liberty (Ninth Amendment).

493 115.Plaintiffs suffered concrete injury traceable to Palantir’s joint activity with
494 government actors; prospective relief is necessary to halt ongoing violations.

495 **Count III — Conspiracy to Interfere with Civil Rights (42 U.S.C. § 1985(3)) and Failure**
496 **to Prevent (42 U.S.C. § 1986)**

497 116.Plaintiffs incorporate ¶¶1–115.

498 117.Plaintiffs allege Defendants agreed and acted in concert to deprive Plaintiffs of equal
499 protection and equal privileges through coordinated surveillance, censorship, and
500 coercion.

501 118.Overt acts include shared moderation pipelines, cross-platform blacklists, predictive

502 policing alerts, and mandate enforcement.

503 119.The conspiracy targeted Plaintiffs’ lawful speech, medical autonomy, travel, privacy,
504 and voting rights.

505 120.Defendants with knowledge of the conspiracy’s aims failed to prevent it despite the
506 power to do so, giving rise to § 1986 liability.

507 121.Plaintiffs suffered economic loss, reputational injury, emotional distress, and ongoing
508 constitutional harms.

509 **Count IV — Electronic Communications Privacy Act (Wiretap Act, 18 U.S.C. §§ 2510–**
510 **2522) and Stored Communications Act (18 U.S.C. §§ 2701–2712)**

511 122.Plaintiffs incorporate ¶¶1–121.

512 123.Palantir intentionally intercepted, endeavored to intercept, and procured others to
513 intercept electronic communications without valid consent in violation of 18 U.S.C. §
514 2511.

515 124.Palantir intentionally accessed without authorization, and exceeded authorization to
516 access, electronic communications in storage in violation of 18 U.S.C. § 2701.

517 125.Palantir knowingly disclosed the contents and metadata of communications to third
518 parties without lawful authorization.

519 126.Plaintiffs are entitled to statutory damages, punitive damages, and equitable relief
520 under 18 U.S.C. §§ 2520, 2707.

521 **Count V — Computer Fraud and Abuse Act (18 U.S.C. § 1030(g))**

522 127.Plaintiffs incorporate ¶¶1–126.

523 128.Palantir, directly or via updates and integrations, accessed protected computers and
524 exceeded authorized access to obtain information of value.

525 129.Palantir’s conduct caused loss exceeding \$5,000 in a one-year period, including
526 business interruption, data loss, security hardening costs, and investigative efforts.

527 130.Plaintiffs seek compensatory damages, injunctive relief, and other remedies under §
528 1030(g).

529 **Count VI — Biometric Privacy & Bodily Autonomy (Common-Law Privacy; State**
530 **Biometric Statutes Where Applicable; Unjust Enrichment)**

531 131.Plaintiffs incorporate ¶¶1–130.

532 132.Palantir captured, used, and profited from Plaintiffs’ biometric identifiers (face,
533 fingerprint, voice, gait) without informed, written consent and without compliant
534 retention/destruction policies.

535 133.Such capture constitutes intrusion upon seclusion and appropriation of likeness under
536 common law.

537 134.To the extent state biometric privacy statutes apply to conduct affecting Plaintiffs,
538 Palantir violated statutory prohibitions on collection, disclosure, and sale without
539 consent and notice.

540 135.Palantir unjustly retained monetary benefits derived from Plaintiffs’ biometrics and
541 associated behavioral profiles.

542 **Count VII — Intrusion Upon Seclusion; Publication of Private Facts; False Light;**
543 **Appropriation of Likeness (Common Law)**

544 136.Plaintiffs incorporate ¶¶1–135.

545 137.Palantir’s pervasive data fusion and ambient collection are highly offensive to a
546 reasonable person and not of legitimate public concern.

547 138.Palantir enabled publication/dissemination of sensitive private information and labels
548 placing Plaintiffs in a false light before the public and counterparties.

549 139.Palantir appropriated Plaintiffs’ likeness, voice, and content streams for commercial
550 advantage (including monetization around Plaintiffs’ channels) without authorization.

551 140.Plaintiffs suffered reputational, economic, and emotional injuries.

552 **Count VIII — Intentional Infliction of Emotional Distress**

553 141.Plaintiffs incorporate ¶¶1–140.

554 142.Palantir’s conduct—including coercive surveillance, risk-of-force stops,
555 deplatforming of livelihood, and psychological manipulation via ephemeral
556 experiences—was extreme and outrageous.

557 143.Palantir acted intentionally or recklessly, knowing harm was substantially certain.

558 144.Plaintiffs suffered severe emotional distress, fear, sleeplessness, and daily anxiety
559 leaving home.

560 **Count IX — Unfair and Deceptive Acts and Practices (UDAP) and Deceptive Omissions**
561 **(including D.C. CPPA, where applicable)**

562 145.Plaintiffs incorporate ¶¶1–144.

563 146.Palantir engaged in unfair/deceptive practices by concealing the scope of surveillance,
564 secondary uses, sharing, and the coercive consequences of “consent.”

565 147.Palantir’s representations omitted material facts about algorithmic manipulation, law-

566 enforcement integration, and persistent risk scoring.

567 148. Plaintiffs relied on the integrity and safety of essential systems and suffered
568 ascertainable losses, entitling them to damages, fees, and equitable relief.

569 **Count X — Sherman Act § 2 (Monopolization/Attempted Monopolization); § 1**
570 **(Unreasonable Restraint), and Clayton Act § 16 (Injunctive Relief)**

571 149. Plaintiffs incorporate ¶¶1–148.

572 150. Relevant markets include at least: public-sector AI/data-fusion platforms, neuro-
573 behavioral surveillance infrastructure, and emergency services data backbones.

574 151. Palantir possesses durable market power through government entanglement,
575 exclusivity, switching costs, data moats, and integrations that foreclose rivals.

576 152. Palantir engaged in exclusionary conduct (exclusive dealing, interoperability
577 sabotage, closed APIs, and tying surveillance access to essential functions) to
578 maintain/extend its monopoly power.

579 153. Palantir’s conduct harms competition and consumers by eliminating opt-out, raising
580 barriers to entry, and coercing dependency, not through superior product alone.

581 154. Plaintiffs seek injunctive relief under Clayton Act § 16 and treble damages where
582 available.

583 **Count XI — Declaratory Judgment: Conduct Constitutes “Domestic Terrorism” Under**
584 **18 U.S.C. § 2331(5)**

585 155. Plaintiffs incorporate ¶¶1–154.

586 156. Palantir’s conduct is dangerous to human life by engineering conditions (algorithmic
587 releases, coercive dependence) that foreseeably increase physical danger and trigger

588 armed enforcement.

589 157. Palantir's conduct appears intended to influence government policy and coerce
590 civilian populations by normalizing inescapable surveillance and algorithmic control.

591 158. Plaintiffs seek a declaratory judgment that the alleged conduct meets § 2331(5)'s
592 definition and injunctive relief prohibiting further deployment; Plaintiffs do not seek a
593 private damages remedy under that section.

594 **Count XII — Declaratory and Injunctive Relief (28 U.S.C. §§ 2201–2202)**

595 159. Plaintiffs incorporate ¶¶ 1–158.

596 160. An actual, justiciable controversy exists concerning the legality of Palantir's
597 surveillance, data fusion, manipulation, and enforcement integrations.

598 161. Plaintiffs seek declarations that Palantir's practices are unlawful and unconstitutional,
599 and injunctions requiring, inter alia: (a) cessation of warrantless data fusion; (b)
600 deletion of Plaintiffs' captured data/biometrics; (c) suspension of predictive-policing
601 integrations; (d) prohibition on "ephemeral" psychological manipulations; (e)
602 transparency, audit, and opt-out mechanisms; and (f) structural separation from
603 emergency-services backbones.

604 162. Absent injunctive relief, Plaintiffs face ongoing, irreparable harm with no adequate
605 remedy at law.

606 **V. BINDING SUPREME COURT PRECEDENT PROTECTING PRIVACY,**
607 **AUTONOMY, AND LIBERTY**

608 Plaintiffs' claims are firmly grounded in established constitutional law. The Supreme
609 Court has repeatedly recognized that individuals are entitled to privacy, autonomy, and

610 freedom from unwarranted surveillance or coercion. These protections extend not only to
611 physical intrusions, but also to technological and digital invasions. The following precedents
612 confirm that Plaintiffs’ rights are being violated by Defendants’ conduct, and that this Court
613 must intervene to protect those rights.

614 1. *Katz v. United States*, 389 U.S. 347 (1967):

615 *“The Fourth Amendment protects people, not places.”*

616 Application: Plaintiffs allege that Palantir-enabled systems intercept conversations,
617 browsing habits, and biometric data through phones, computers, and devices. Under
618 *Katz*, these warrantless intrusions constitute unconstitutional searches against the
619 Plaintiffs.

620 2. *Kyllo v. United States*, 533 U.S. 27 (2001):

621 *“Obtaining by sense-enhancing technology any information regarding the interior of*
622 *the home... constitutes a search—at least where the technology is not in general public*
623 *use.”*

624 Application: Plaintiffs allege that Palantir-linked sensors, smart devices, and
625 environmental nanotech monitor in-home activity. Under *Kyllo*, these invasions into
626 Plaintiffs’ homes are unconstitutional.

627 3. *United States v. Jones*, 565 U.S. 400 (2012):

628 *“Longer term GPS monitoring... impinges on expectations of privacy.”*

629 Application: Plaintiffs allege Palantir enables persistent location tracking through
630 phones, cars, airport scans, and travel data. Under *Jones*, this continuous monitoring of
631 Plaintiffs’ movements violates their Fourth Amendment rights.

632 4. *Riley v. California*, 573 U.S. 373 (2014):

633 *“Cell phones... are not just another technological convenience. With all they contain,*
634 *they hold for many Americans ‘the privacies of life.’”*

635 Application: Plaintiffs allege Palantir-enabled updates and integrations extract their
636 phone data without consent. Under *Riley*, this intrusion into Plaintiffs’ phones violates
637 their constitutional rights.

638 5. *Carpenter v. United States*, 138 S. Ct. 2206 (2018):

639 *“A person does not surrender all Fourth Amendment protection by venturing into the*
640 *public sphere.”*

641 Application: Plaintiffs allege Palantir integrates with telecom and government systems
642 to compile location histories. Under *Carpenter*, Plaintiffs retain privacy rights even in
643 public, and Defendants’ actions are unconstitutional.

644 6. *Ferguson v. City of Charleston*, 532 U.S. 67 (2001):

645 *“The Fourth Amendment’s protection of privacy extends even to medical tests.”*

646 Application: Plaintiffs allege health-system data is funneled into Palantir systems
647 without consent. Under *Ferguson*, such non-consensual medical surveillance violates
648 constitutional privacy rights.

649 7. *Winston v. Lee*, 470 U.S. 753 (1985):

650 *“The interests in human dignity and privacy which the Fourth Amendment protects*

651 *forbid surgical intrusions.*”

652 Application: Plaintiffs allege forced biometric capture and invasive procedures linked
653 to Palantir analytics. Under *Winston*, compelled bodily intrusions are unconstitutional.

654 8. *Cruzan v. Director, Missouri Dept. of Health*, 497 U.S. 261 (1990):

655 *“The principle that a competent person has a constitutionally protected liberty interest*
656 *in refusing unwanted medical treatment.”*

657 Application: Plaintiffs allege coercion into tech-linked medical procedures. Under
658 *Cruzan*, Plaintiffs have the right to refuse such interventions.

659 9. *NAACP v. Alabama*, 357 U.S. 449 (1958):

660 *“Inviolability of privacy in group association may in many circumstances be*
661 *indispensable to freedom of association.”*

662 Application: Plaintiffs allege Palantir exposes associations, contacts, and groups. Under
663 *NAACP*, compelled disclosure that chills association is unconstitutional.

664 10. *Packingham v. North Carolina*, 137 S. Ct. 1730 (2017):

665 *“Social media... is the modern public square.”*

666 Application: Plaintiffs allege censorship and suppression of online speech coordinated
667 with Palantir-enabled systems. Under *Packingham*, this interferes with First
668 Amendment rights.

669 11. *NRA v. Vullo*, 602 U.S. ____ (2024):

670 *“The government may not coerce private parties to suppress lawful speech.”*

671 Application: Plaintiffs allege platforms suppressed content at government urging, with
672 Palantir tools aiding enforcement. Under *Vullo*, such coercion violates constitutional
673 rights.

674 12. *Americans for Prosperity Foundation v. Bonta*, 141 S. Ct. 2373 (2021):

675 *“Compelled disclosure of affiliation with groups engaged in advocacy is subject to*
676 *exacting scrutiny.”*

677 Application: Plaintiffs allege Palantir-enabled surveillance exposes private affiliations.
678 Under *Bonta*, such exposure chills speech and association, violating constitutional
679 protections.

680 13. *Norwood v. Harrison*, 413 U.S. 455 (1973):

681 *“It is axiomatic that the government may not induce, encourage, or promote private*
682 *persons to accomplish what it is constitutionally forbidden to accomplish.”*

683 Application: Plaintiffs allege Palantir acts as a government proxy to perform
684 unconstitutional surveillance and censorship. Under *Norwood*, this conduct is unlawful.

685 14. *Brentwood Academy v. TSSAA*, 531 U.S. 288 (2001):

686 *“State action may be found when private actors are entwined with governmental*
687 *policies.”*

688 Application: Plaintiffs allege Palantir is entwined with government contracts and
689 enforcement. Under *Brentwood*, Palantir’s conduct qualifies as state action.

690 15. *Goldberg v. Kelly*, 397 U.S. 254 (1970):

691 *“The fundamental requisite of due process... is the opportunity to be heard.”*

692 Application: Plaintiffs allege algorithmic decisions affecting rights are made without
693 notice or opportunity to contest. Under *Goldberg*, this lack of process violates due
694 process rights.

695 16. *Whalen v. Roe*, 429 U.S. 589 (1977):

696 *“The Constitution protects against public disclosure of personal matters.”*

697 Application: Plaintiffs allege Palantir-enabled databases expose sensitive medical and
698 personal data. Under *Whalen*, this disclosure violates constitutional privacy interests.

699 17. *Sorrell v. IMS Health*, 564 U.S. 552 (2011):

700 *“The State may not burden the speech of others in order to tilt public debate in a*
701 *preferred direction.”*

702 Application: Plaintiffs allege Palantir tools are used to manipulate feeds and suppress
703 viewpoints. Under *Sorrell*, this viewpoint-based control violates free speech rights.

704 18. *Murthy v. Missouri*, 601 U.S. ____ (2024):

705 *“The government may not use private entities to accomplish what it is constitutionally*

706 *forbidden to do directly.”*

707 Application: Plaintiffs allege Palantir was used to enforce government censorship
708 indirectly. Under *Murthy*, this conduct remains unconstitutional.

709 19. *Skinner v. Railway Labor Executives’ Ass’n*, 489 U.S. 602 (1989):

710 *“The collection and testing of urine intrudes upon expectations of privacy.”*

711 Application: Plaintiffs allege compelled biometric capture and bodily data collection
712 via Palantir systems. Under *Skinner*, these are unconstitutional searches.

713 20. *West Virginia State Board of Education v. Barnette*, 319 U.S. 624 (1943):

714 *“No official can prescribe what shall be orthodox in politics, nationalism, religion, or*
715 *other matters of opinion.”*

716 Application: Plaintiffs allege Palantir-enabled systems compel compliance with
717 ideological training, scripts, or propaganda. Under *Barnette*, this constitutes
718 impermissible compelled speech.

719 Taken together, these twenty Supreme Court precedents establish binding constitutional
720 protections that directly apply to the Plaintiffs’ claims in this case.

721 Each ruling confirms that privacy, autonomy, speech, association, bodily integrity, and
722 freedom from compelled compliance are not optional privileges but fundamental rights
723 guaranteed under the United States Constitution. Palantir Technologies, Peter Thiel, and its
724 officers, acting both as private actors and in concert with the government, have engaged in
725 conduct that squarely violates these established protections.

726 From warrantless surveillance to compelled disclosures, from censorship-by-proxy to
727 coerced medical interventions, Defendants’ actions strike at the very heart of the liberties these
728 cases enshrine. Plaintiffs John Doe and Jane Doe are suffering present and ongoing injuries
729 from this unconstitutional regime, and the precedents above mandate judicial intervention to
730 restrain Defendants’ conduct and restore Plaintiffs’ constitutional rights.

731 **VI. SUMMARY OF ALLEGATIONS**

732 Plaintiffs bring this Verified Complaint because they are living under constant intrusion
733 and coercion by Defendants’ technologies. Palantir Technologies Inc., directed and controlled
734 by Peter Thiel, Alex Karp, Shyam Sankar, and other officers, has created a vast system of
735 surveillance, indoctrination, and behavioral control that deprives Plaintiffs of their unalienable
736 rights.

737 Through biometric harvesting, predictive analytics, and integration into essential services,
738 Palantir’s systems assume consent where none exists. Plaintiffs are tracked when they travel,
739 coerced when they attempt to exercise medical freedom, monitored when they speak, and
740 manipulated through algorithmic propaganda disguised as reality.

741 Plaintiffs cannot eat, drink, breathe, or communicate without encountering hidden layers
742 of Palantir-enabled technology designed to extract data, influence perception, and enforce
743 compliance.

744 The danger is most acute for society’s most vulnerable: children, the elderly, and the
745 disabled. Children are indoctrinated into dependency on AI-driven systems, rendering them
746 incapable of independent judgment or resistance.

747 The elderly and disabled, increasingly subjected to algorithmic determinations of
748 “usefulness,” face the terrifying prospect of being denied care—or even euthanized—without
749 consent, as efficiency and compliance are prioritized over compassion and life itself.

750 The danger is most acute for society’s most vulnerable: children, the elderly, and the
751 disabled. Children are indoctrinated into dependency on AI-driven systems, rendering them
752 incapable of independent judgment or resistance.

753 These children, indoctrinated by Palantir-enabled technologies, are the adults of
754 tomorrow. Because they lack the capacity for critical thought and independent decision-
755 making, they pose a direct threat to the survival of society in its natural state.

756 By design, they will perpetuate and expand the reach of AI domination, ensuring that
757 future governance and culture are ruled not by human reason or compassion, but by the
758 programmed biases of Defendants’ artificial intelligence systems.

759 This is not an abstract threat but a direct and imminent one to Plaintiffs themselves.
760 Plaintiffs will one day face aging, disability, or periods of dependency. Under Palantir’s
761 systems, survival and medical treatment may be dictated not by family, doctors, or conscience,
762 but by biased algorithms programmed by Defendants.

763 Defendant Peter Thiel has openly demonstrated ambivalence toward whether humanity
764 should endure, evidencing a worldview in which those deemed no longer “useful” may be
765 discarded. Plaintiffs face the real prospect that, should they fall outside Palantir’s algorithmic
766 criteria of worth, they could be targeted for elimination.

767 Plaintiffs further emphasize that the invasion of Palantir-enabled technology extends to

768 the very foundations of survival: air, food, water, and weather. Plaintiffs’ own gardens have
769 been damaged by engineered fertilizers and manipulated rain; their air is tainted by smart dust
770 and particulates; their water is infiltrated by substances not of natural origin; and their food,
771 even when labeled organic, is compromised by hidden nanotechnology. These harms strike
772 directly at Plaintiffs’ health, property, and ability to survive.

773 Plaintiffs are left with no safe alternative, no natural refuge, and no way to live free of
774 technological coercion. By integrating artificial intelligence into the most basic necessities of
775 life, Defendants have rendered Plaintiffs’ continued existence dependent upon submission to
776 systems they did not choose and cannot escape.

777 The harm is not speculative—it is ongoing and deeply personal. Plaintiffs have already
778 lost livelihoods through deplatforming and censorship, lost privacy through forced biometrics,
779 lost freedom of association and expression through intimidation, and lost the natural
780 enjoyment of life through manufactured realities and technological obsolescence. Plaintiffs’
781 very futures—life, liberty, property, survival—are in jeopardy if this system continues
782 unchecked.

783 Palantir’s scheme constitutes a pattern of racketeering, a conspiracy to deprive civil
784 rights, a system of unlawful surveillance, and an attempt to monopolize the very infrastructure
785 of human life.

786 Defendants’ acts are so pervasive and dangerous that they rise to the level of domestic
787 terrorism under federal law, creating imminent threats to Plaintiffs’ liberty, bodily integrity,
788 cognitive freedom, and pursuit of happiness.

789 Plaintiffs respectfully submit that this Court must intervene immediately to halt the
790 ongoing violations, declare Defendants’ practices unlawful, and restore to Plaintiffs and the
791 public the fundamental right to live free from technological enslavement.

792 **VII. RESERVATION OF TRIAL BY JURY**

793 163. Plaintiffs expressly reserve the right to a trial by jury on all issues so triable under
794 the Constitution and laws of the United States. Plaintiffs further reserve the right to
795 amend this Verified Complaint to specify jury-triable claims as discovery and
796 proceedings clarify the scope of relief and damages sought.

797 **VIII. EXHIBIT LIST**

798 Plaintiffs hereby incorporate by reference the following Exhibits in support of this
799 Verified Complaint:

800 Category 1 — Statutory & Legal Basis

- 801 • Exhibit A: Copy of the C.L.O.N.E. Act of 2025 (Individual Protections Against
802 AI Intrusion).

803 Category 2 — Public Statements & Admissions

- 804 • Exhibit B: Transcript excerpt of Defendant Peter Thiel’s interview with Ross
805 Douthat, wherein he hesitated when asked whether humanity should survive.
806 • Exhibit C: Palantir marketing and investor materials demonstrating intent to
807 replace human judgment with “machine-speed” decision-making.

808 Category 3 — Plaintiffs’ Personal Evidence

- 809 • Exhibit D: Screenshots and records of Plaintiff’s YouTube channel

810 demonetization, subscriber loss, and permanent removal.

811 • Exhibit E: Evidence of Facebook/Twitter account deletions and loss of all
812 personal photographs and content.

813 Category 4 — Technological Coercion Evidence

814 • Exhibit F: Screenshots of forced phone updates, demonstrating denial of
815 functionality absent coerced agreement.

816 • Exhibit G: Airport/TSA biometric scan records including fingerprinting and
817 facial recognition.

818 • Exhibit H: Records of medical mandates (vaccine QR enforcement, refusal
819 penalties) tied to technological systems.

820 Category 5 — Scientific & Expert Material

821 • Exhibit I: Reports, publications, and expert commentary on AI manipulations,
822 ephemeral experiences, nanotechnology in food, and cloud seeding impacting
823 natural health and environment.

824 Category 6 — Economic Harm

825 • Exhibit J: Financial records, bank statements, and/or tax records documenting
826 Plaintiffs' lost income from deplatformed YouTube channel.

827 **IX. REQUEST FOR RELIEF**

828 WHEREFORE, Plaintiffs respectfully demand that this Court enter judgment in their
829 favor and against Defendants as follows:

830 **1. Declaratory Relief**

- 831 • A declaration that Defendants’ conduct—including surveillance, biometric collection,
832 indoctrination, manipulation, and algorithmic control—violates the Constitution, the
833 C.L.O.N.E. Act of 2025, federal civil rights statutes, and common law rights of privacy
834 and autonomy.
- 835 • A declaration that Palantir’s collaboration with government entities constitutes
836 unlawful aiding and abetting of constitutional violations, rising to the level of
837 treasonous conduct against the People of the United States.

838 **2. Injunctive Relief**

- 839 • An immediate injunction halting Palantir’s use, sale, or deployment of AI-enabled
840 surveillance and manipulation technologies within the United States.
- 841 • An injunction prohibiting Palantir’s integration of AI into government agencies, law
842 enforcement, emergency services, education, or healthcare systems.
- 843 • An injunction requiring deletion of all biometric, personal, or behavioral data collected
844 from Plaintiffs and similarly situated individuals without informed, voluntary consent.
- 845 • A permanent injunction prohibiting Palantir from using its platforms (including
846 Gotham, Foundry, MetaConstellation) for domestic civilian surveillance, behavioral
847 manipulation, or integration with coercive mandates.
- 848 • An injunction requiring clear, conspicuous, and detailed warning labels on all consumer
849 goods, services, and environments that incorporate Palantir-enabled artificial
850 intelligence or neurotechnology, including food, water, medicine, clothing, electronics,

851 vehicles, and communications platforms.

852 • Labels shall identify the presence of AI/neurotechnology, describe known and
853 potential harmful effects of use and continued use, and be accompanied by
854 mandatory inserts or disclosure sheets for all medicines, vaccines, and medical
855 devices.

856 • Euphemisms, invented terminology, or disguised language to obscure
857 AI/neurotech content shall be prohibited; Defendants must use direct, plain
858 terms such as “nanobots,” “neurotechnology,” or “artificial intelligence.”

859 • Licensed medical providers shall be required to verbally disclose to patients the
860 presence of such technologies in any treatment and obtain explicit informed
861 consent.

862 • An injunction prohibiting Defendants from producing, distributing, or sponsoring
863 cartoons, animations, videos, or promotional content designed to entice or persuade
864 children, teenagers, or young adults to engage with AI/neurotechnology.

865 • Such materials shall be treated as adult-oriented content, barred from child/teen
866 audiences, and restricted to clearly labeled adult-only channels with health
867 warnings.

868 • An injunction banning Defendants from engaging in weather manipulation,
869 atmospheric engineering, or environmental interventions involving nanotechnology or
870 biotech particulates that contaminate air, water, food, or natural cycles.

871 **3. Structural Relief**

- 872 • Dissolution or court-supervised restructuring of Palantir Technologies Inc. to eliminate
873 its capacity to monopolize AI-driven surveillance and coercion.
- 874 • In the alternative, structural separation of Palantir’s government-contracting arm from
875 any consumer-facing technologies, under strict judicial oversight.
- 876 • Appointment of an independent monitor to oversee compliance and prevent further
877 constitutional violations.
- 878 • A permanent injunction prohibiting Palantir from developing, deploying, or marketing
879 AI/neurotechnology systems in food, water, medicine, weather, or other essential
880 natural elements.
- 881 • A mandate requiring Palantir to maintain a public, searchable registry of all
882 AI/neurotechnology deployments in public-facing environments (schools, hospitals,
883 retail establishments, government services), with real-time updates and opt-out
884 mechanisms.

885 **4. Damages**

- 886 • Compensatory damages for Plaintiffs’ economic losses, including lost income, lost
887 accounts, and diminished property and liberty interests.
- 888 • General damages for emotional distress, reputational harm, and deprivation of the
889 natural enjoyment of life.
- 890 • Punitive damages sufficient to deter Defendants and others from engaging in similar
891 misconduct.

- 892 • Treble damages as provided under RICO (18 U.S.C. § 1964(c)) and antitrust statutes
893 (15 U.S.C. § 15).

894 **5. Attorneys' Fees and Costs**

- 895 • Reasonable attorneys' fees, expert witness fees, and litigation costs pursuant to 42
896 U.S.C. § 1988, 18 U.S.C. § 1964(c), and other applicable law.

897 **6. Other Relief**

- 898 • Any further relief that the Court deems just, equitable, and necessary to protect
899 Plaintiffs' rights, restore constitutional governance, and safeguard the People of the
900 United States from ongoing technological enslavement.

901 **Compliance Timeframe**

902 **7. Compliance Deadline**

- 903 • Plaintiffs request that this Court order Defendants to comply with all injunctive and
904 structural relief provisions within thirty (30) days of the Court's order.
- 905 • For relief requiring substantial organizational changes (such as restructuring or creation
906 of public registries), Plaintiffs request that Defendants be compelled to present to the
907 Court, within thirty (30) days, a detailed compliance plan and timeline not to exceed
908 ninety (90) days for full implementation.
- 909 • Plaintiffs further request that failure to meet the thirty (30) day deadline, or to file a
910 satisfactory compliance plan, shall result in immediate contempt sanctions, daily
911 monetary penalties, and the appointment of a special master or independent monitor
912 with authority to implement compliance at Defendants' expense.

913 **Verification Statement – Plaintiff John Doe**

914 I, John Doe, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that I
915 am one of the Plaintiffs in this action; that I have read the foregoing Verified Complaint; and
916 that the facts stated therein are true and correct to the best of my knowledge, information, and
917 belief. Executed on this ___ day of _____, 2025.

918 /s/ _____
919 John Doe, Plaintiff

920 **Verification Statement – Plaintiff Jane Doe**

921 I, Jane Doe, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that I
922 am one of the Plaintiffs in this action; that I have read the foregoing Verified Complaint; and
923 that the facts stated therein are true and correct to the best of my knowledge, information, and
924 belief. Executed on this ___ day of _____, 2025.

925 /s/ _____
926 Jane Doe, Plaintiff
927

928 Respectfully submitted this ___ day of August 2025.

929 /s/ _____
930 John Doe
931 Plaintiff, Pro Se

932 /s/ _____
933 Jane Doe
934 Plaintiff, Pro Se
935
936