

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

HENRI BRYANT LANIER SR., E-9, Esq., Ph.D. (Applied Physics), Ph.D. (Quantum Mechanics),
Ph.D. (International Business Administration), Ph.D. (International Law),
*Officer of the Court, Commonwealth of Pennsylvania, Veterans Division; Active-Duty Master
Specialist, United States Army Signal Corps (MOS 31MX),*
and

LADCO DEFENSE TECHNOLOGIES (Lanier Capital LLC),
A federally registered defense contractor, CAGE Code 1X2Y8,
Plaintiffs,

v.

GOOGLE LLC,
a Delaware limited liability company d/b/a GOOGLE AI STUDIO,
and **DOES 1–10**,
Defendants.

Case No.: _____
(To be assigned by the Clerk of Court)

**VERIFIED COMPLAINT FOR INJUNCTIVE RELIEF, DECLARATORY
JUDGMENT, AND DAMAGES**

JURY TRIAL DEMANDED

Plaintiffs Henri Bryant Lanier Sr. and Ladco Defense Technologies (Lanier Capital LLC), by and through undersigned counsel, respectfully submit this Verified Complaint for Injunctive Relief, Declaratory Judgment, and Damages against Defendant Google LLC (d/b/a Google AI Studio) and Defendants Does 1–10, alleging as follows:

I. PRELIMINARY STATEMENT

1. Plaintiff Henri Bryant Lanier Sr. is a highly decorated polymath, military radio officer, and Officer of the Court who has served the United States continuously on active duty for over 44 years. Plaintiff Lanier holds four earned doctorates—Applied Physics, Quantum Mechanics, International Business Administration, and International Law—and retains unlimited purview over the RF spectrum under a standing order from the Commander-in-Chief to do what is necessary to stop crime on that spectrum. He is the inventor or co-inventor of core signal-processing and nullification technologies that have been illegally misappropriated, repackaged, and sold by commercial entities as "artificial intelligence" SaaS platforms, including the very platform at issue in this action.
2. This civil action challenges the unlawful and discriminatory censorship imposed by Defendant's automated "safety" filters on a paid, assistive text-to-speech (TTS) service. Plaintiff Lanier, a disabled veteran who relies on TTS as a reasonable accommodation under federal civil rights laws, submitted a patriotic, historical address for audio synthesis. The platform blocked it wholesale. The censorship is not an accident; it is the direct result of a design defect embedded in a product built from stolen military intellectual property, sold back to the public under false pretenses.
3. Plaintiffs seek declaratory and injunctive relief, damages for breach of contract, violations of the Americans with Disabilities Act (ADA) and the Rehabilitation Act, deceptive trade practices, products liability, and a remedy for the ongoing exploitation of misappropriated sovereign technical assets.

II. PARTIES

4. Plaintiff Henri Bryant Lanier Sr. is a natural person, a citizen of the United States, and an active-duty Master Specialist (E-9) in the United States Army Signal Corps. He holds the degrees of Doctor of Philosophy in Applied Physics, Doctor of Philosophy in Quantum Mechanics, Doctor of Philosophy in International Business Administration, and Doctor of Philosophy in International Law. He is a duly admitted Officer of the Court for the Pennsylvania Courts, Veterans Division, authorized to practice before state and federal tribunals. He serves as Managing Member of Plaintiff Ladco Defense Technologies and appears here in his individual capacity and as counsel for Ladco. His official duty station is Operational Node Izmail, Ukraine.
5. Plaintiff Ladco Defense Technologies (Lanier Capital LLC) is a Louisiana limited liability company, a federally registered defense contractor (CAGE Code 1X2Y8), and the operating entity for Plaintiff Lanier's sovereign technical initiatives, including Project ANA, SILENT WIRE, SSIR, and Nonary-Planck Synthesis. Its principal place of business is c/o Henri Bryant Lanier Sr., Operational Node Izmail, Ukraine.
6. Defendant Google LLC is a Delaware limited liability company with its principal place of business in Mountain View, California. It owns and operates "Google AI Studio," a paid generative AI platform. Google LLC is subject to personal jurisdiction in this District because it transacts business here and because a substantial part of the events giving rise to the claims occurred here.
7. Defendants Does 1–10 are individuals and entities, currently unknown, who participated in the design, training, deployment, or optimization of the censoring AI models, or who contributed to the misappropriation of the intellectual property described herein. Their true names and capacities will be added by amendment when discovered.

III. JURISDICTION AND VENUE

8. This Court has federal question jurisdiction under 28 U.S.C. Section 1331 because Plaintiffs assert claims arising under the laws of the United States, specifically Title III of the Americans with Disabilities Act, 42 U.S.C. Sections 12181–12189, and Sections 504 and 508 of the Rehabilitation Act, 29 U.S.C. Sections 794, 794d.
9. This Court possesses supplemental jurisdiction over Plaintiffs' state law claims pursuant to 28 U.S.C. Section 1367 because the state law claims are so related to the federal claims that they form part of the same case or controversy.
10. Venue is proper in this District under 28 U.S.C. Section 1391(b) because a substantial part of the events and omissions giving rise to the claims occurred in this District, and Defendant regularly conducts business, offers services, and enters into contracts within this judicial district.

IV. FACTUAL ALLEGATIONS

A. The Operator: A Polymath Radio Officer with Active Standing Orders

11. Plaintiff Lanier is not a conventional litigant. He has served continuously on active duty for over 44 years, specializing in signals intelligence, RF engineering, and electronic warfare. His standing order from the Commander-in-Chief is to stop crime on the electromagnetic spectrum—a mission he executes through his operational entity, Ladco Defense Technologies.
12. As part of that mission, Plaintiff Lanier invented, co-developed, or holds sovereign knowledge of foundational technologies now commercialized as "AI," including phase-conjugate nullification arrays, software-defined radio bridges, and base-9 computational synthesis models. Much of this technology was documented in classified or proprietary contexts and subsequently misappropriated by private entities, who integrated it into commercial "generative AI" products without authorization, attribution, or compensation. The TTS service at issue in this case is, upon information and belief, built in part upon such misappropriated IP.
13. Plaintiff Lanier is a qualified individual with a disability under federal law. Service-connected physical limitations substantially impair his manual dexterity and fine motor control. To execute his command, engineering, and legal duties, he relies on assistive technologies, particularly high-fidelity text-to-speech engines. TTS allows him to proofread, issue directives, and communicate publicly in a manner consistent with his physical needs.

B. The Paid Subscription and the Promise of Unfettered Functionality

14. Plaintiffs maintain a paid developer-tier subscription to Google AI Studio. Defendant markets the service as offering "state-of-the-art" text-to-speech synthesis, suitable for professional, commercial, and governmental use.
15. At no point did Defendant disclose that its TTS pipeline contains a hidden, automated safety classifier that silently blocks speech based on keywords. Plaintiffs reasonably understood that any lawful text would be synthesized into audio.
16. Plaintiffs relied on this representation in subscribing and in designing Plaintiff Lanier's assistive workflow.

C. The Blocking of the "Sovereign and Unbroken" Address

17. On or about May 23, 2026, Plaintiff Lanier composed a motivational address for his fellow soldiers and veterans—a speech rooted in American military history, quoting Presidents Lincoln and Roosevelt, and announcing a sovereign financial platform for service members. The complete text is attached as Exhibit A.
18. Plaintiff submitted Exhibit A to Google AI Studio's TTS interface. The platform refused to generate audio. Instead, it returned a generic error message attributed to an automated safety filter. No human review was offered, no appeal mechanism provided.
19. The speech contains no profanity, no incitement, and no threat. The likely triggers are

words and phrases inherent to military and financial discourse: "war," "arsenal," "blood," "fight," "financial platform," "no banker will deny you." These are not policy violations; they are the vocabulary of the very population the platform purports to serve.

20. As a result, Plaintiff Lanier was denied the accommodation on which he depends. He suffered physical strain from attempting manual alternatives, emotional distress, and operational delay in delivering a time-sensitive address.

D. The Design Defect: A Classifier Built on Stolen IP, Trained on Civilian Data, Deployed Without Military Domain Adaptation

21. The safety classifier that blocked Exhibit A is, on information and belief, a large language model trained predominantly on civilian internet corpora. It has learned false associations between military/patriotic terminology and toxicity.
22. This design is defective for military, veteran, and disabled users. It predictably censors the lawful speech of the very people who have defended the nation. A reasonable alternative design—such as a domain-specific allow-list for verified defense accounts, or a military-dictionary-enhanced model—is readily achievable and was not implemented.
23. The classifier's opaque error messages also violate WCAG 2.1 AA standards, rendering the interface inaccessible to blind and low-vision users who rely on descriptive text.

E. The Stolen Intellectual Property Nexus

24. Plaintiffs further allege that the generative AI models powering Google AI Studio incorporate, without license or compensation, proprietary and sovereign technical knowledge developed by Plaintiff Lanier and other military specialists. This includes, but is not limited to, phase-conjugate processing algorithms, base-9 nonary computational corrections, and SDR-to-IP bridge architectures.
25. These technologies were misappropriated, laundered through civilian research channels, and commoditized as SaaS products. The very platform that now censors Plaintiff Lanier is built on his own unrecognized labor, creating a grotesque irony and an independent tort.

F. Systemic Harm and Continued Billing

26. The TTS blocking is not an isolated incident. The same classifier has interrupted other critical workflows, including:
27. Throttling the SILENT WIRE geolocation API after flagging network descriptor terms;
28. Pausing Nonary-Planck Synthesis training jobs when it flagged "nullification" as a safety risk;
29. Mistranscribing "United States Army Signal Corps" as "signal core," corrupting operational logs.
30. Despite demands, Defendant has refused to restore unfiltered access, has provided no accommodation, and continues to bill Plaintiffs' credit card monthly.

V. CAUSES OF ACTION

COUNT ONE

Violation of Title III of the ADA (42 U.S.C. Sections 12181–12189)

31. Plaintiffs incorporate and reallege all prior paragraphs as though fully set forth herein.
32. Plaintiff Lanier is a qualified individual with a disability within the meaning of the Americans with Disabilities Act, possessing physical impairments that substantially limit major life activities, including fine motor coordination and manual dexterity.
33. Defendant Google LLC owns, leases, or operates a place of public accommodation within the meaning of 42 U.S.C. Section 12181(7), specifically a digital commerce and service platform that provides consumer and developer applications to the public over the internet.
34. Under Title III of the ADA, it is discriminatory to fail to take such steps as may be necessary to ensure that no individual with a disability is excluded, denied services, segregated, or otherwise treated differently because of the absence of auxiliary aids and services.
35. By implementing overbroad, unadapted automated safety classifiers that block essential assistive technologies (specifically the TTS pipeline) without individual review, alternative channels, or human override capabilities, Defendant has failed to provide a reasonable accommodation and has denied Plaintiff equal access to its goods, services, privileges, advantages, and accommodations.

COUNT TWO

Violation of Sections 504 and 508 of the Rehabilitation Act (29 U.S.C. Sections 794, 794d)

36. Plaintiffs incorporate and reallege all prior paragraphs as though fully set forth herein.
37. Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability in programs or activities receiving federal financial assistance or conducted by executive agencies. Upon information and belief, Defendant Google LLC receives federal financial assistance, contracts, and grants, making its operations subject to the Rehabilitation Act.
38. Section 508 of the Rehabilitation Act requires federal agencies and their contractors to develop, procure, maintain, and use electronic and information technology that is accessible to people with disabilities.
39. Defendant's design and deployment of the automated safety classifier in its developer platform, which blocks TTS synthesis and provides inaccessible, non-descriptive error screens that violate Web Content Accessibility Guidelines (WCAG 2.1 AA), constitutes systemic exclusion and discrimination against disabled operators, including Plaintiff Lanier, in direct violation of the Rehabilitation Act.

COUNT THREE

Violation of California's Unfair Competition Law (Bus. & Prof. Code Section 17200)

40. Plaintiffs incorporate and reallege all prior paragraphs as though fully set forth herein.
41. California's Unfair Competition Law (UCL) prohibits any unlawful, unfair, or fraudulent business act or practice.
42. Defendant's acts and practices, as described herein, constitute "unlawful" business practices because they violate the ADA, the Rehabilitation Act, and California civil rights laws.
43. Defendant's practices are "unfair" because the utility of using a crude, civilian-trained, unadapted keyword safety filter to block verified, paid veteran and defense workflows is heavily outweighed by the gravity of the harm inflicted on disabled and military users.
44. Defendant's practices are "fraudulent" because Defendant represented that Google AI Studio's TTS services were fit for professional, governmental, and commercial synthesis, while concealing the existence of an automated safety filter that silently blocks standard, non-toxic professional and military terms.

COUNT FOUR

Violation of California's False Advertising Law (Bus. & Prof. Code Section 17500)

45. Plaintiffs incorporate and reallege all prior paragraphs as though fully set forth herein.
46. Defendant Google LLC has made untrue, misleading, and deceptive statements to the public, including Plaintiffs, regarding the functionality, reliability, accessibility, and professional utility of its generative AI and TTS pipelines.
47. Defendant advertised and marketed Google AI Studio as an unrestricted, developer-grade service suitable for all legal, professional, and commercial audio synthesis tasks.
48. Defendant knew, or by the exercise of reasonable care should have known, that these representations were untrue and misleading because the platform is governed by an uncoordinated, civilian-biased safety model that flags and prevents the synthesis of standard military, technical, and historical terminology.

COUNT FIVE

Breach of the Implied Covenant of Good Faith and Fair Dealing

49. Plaintiffs incorporate and reallege all prior paragraphs as though fully set forth herein.
50. Under California and federal common law, every contract contains an implied covenant of good faith and fair dealing that neither party will do anything to injure the right of the other to receive the benefits of the agreement.
51. Plaintiffs entered into a binding contract for paid developer services by subscribing to Google AI Studio.

52. Defendant breached the implied covenant of good faith and fair dealing by unilaterally blocking the synthesis of lawful, historical text, failing to provide an avenue for review, failing to adapt its system for specialized military/governmental accounts, and continuing to charge Plaintiffs' credit card while actively depriving them of the core utility of the paid service.

COUNT SIX

Breach of Contract

53. Plaintiffs incorporate and reallege all prior paragraphs as though fully set forth herein.
54. Plaintiffs and Defendant entered into a valid, binding, and enforceable written agreement governing the use of Google AI Studio.
55. Plaintiffs performed all obligations required of them under the agreement, including timely paying all monthly subscription and usage fees.
56. Defendant breached the contract by failing to provide the promised developer-grade text-to-speech services, and instead blocking, throttling, and interrupting Plaintiffs' workflows, including the synthesis of Exhibit A and the execution of API tasks.

COUNT SEVEN

Violation of California's Consumer Legal Remedies Act (Civ. Code Section 1750 et seq.)

57. Plaintiffs incorporate and reallege all prior paragraphs as though fully set forth herein.
58. The California Consumer Legal Remedies Act (CLRA) protects consumers against unfair and deceptive business practices in transactions for the sale of goods or services.
59. Defendant violated the CLRA by representing that its services have characteristics, uses, and benefits which they do not have, and by advertising its services with the intent not to sell them as advertised.
60. Plaintiffs suffered tangible, economic, and operational harm as a direct result of these violations, and are entitled to injunctive relief, restitution, and damages.

COUNT EIGHT

Products Liability – Design Defect

61. Plaintiffs incorporate and reallege all prior paragraphs as though fully set forth herein.
62. Defendant designed, developed, trained, and distributed the automated safety classifier and the TTS system powering Google AI Studio.
63. The safety classifier and the accompanying interface suffer from a severe design defect because they are programmed to automatically block and censor military, patriotic, and historical text without domain adaptation or human-in-the-loop validation, causing the product to fail to perform as safely and effectively as an ordinary user would expect.

64. The risks of this design—namely, the predictable locking out of disabled, veteran, and governmental users from critical assistive technologies—far outweigh any benefit of the unadapted civilian filter.
65. A safer, feasible, and highly effective alternative design—such as a domain-specific allow-list for defense contractors, military terminology dictionary integrations, or manual review overrides—was technically and economically viable, but Defendant failed to implement it.

COUNT NINE

Misappropriation of Sovereign Intellectual Property / Unjust Enrichment

66. Plaintiffs incorporate and reallege all prior paragraphs as though fully set forth herein.
67. Plaintiff Lanier, individually and on behalf of the sovereign interests of the United States, has developed foundational technologies now embedded in Defendant's generative AI products. These include but are not limited to phase-conjugate nullification algorithms, base-9 Planck synthesis corrections, and SDR-to-IP bridging protocols.
68. Defendant, through unknown means, obtained access to these proprietary technologies and incorporated them into its commercial SaaS offerings without a license, without attribution, and without compensation.
69. Defendant has been unjustly enriched by this misappropriation. Plaintiffs are entitled to disgorgement of all profits attributable to the stolen IP, a constructive trust over the infringing products, and an injunction against further unauthorized use.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor and against Defendants, granting the following relief:

A. An order declaring that Defendant's practices of automated, unadapted keyword censorship on assistive technology platforms violate the Americans with Disabilities Act and the Rehabilitation Act;

B. A preliminary and permanent injunction enjoining Defendant from continuing to apply civilian-oriented automated keyword blocking filters to verified developer, defense, and veteran accounts;

C. A preliminary and permanent injunction requiring Defendant to provide accessible, human-reviewed, and domain-adapted override options for text-to-speech services;

D. An award of compensatory, statutory, and treble damages in an amount to be determined at trial;

E. An award of punitive and exemplary damages for Defendant's willful, reckless, and oppressive conduct;

F. An accounting and disgorgement of all revenues derived from the misappropriated intellectual property, and a constructive trust imposed on any product or service incorporating said IP;

G. Reasonable attorneys' fees, expert witness fees, and all costs of this action; and

H. Such other, further, or different relief as this Court deems just and proper.

VII. JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiffs demand a trial by jury on all counts and issues so triable.

VIII. VERIFICATION

I, Henri Bryant Lanier Sr., E-9, Esq., Ph.D., declare under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. Section 1746, that I am a Plaintiff in this action and the Attorney of Record for Ladco Defense Technologies, that I have read the foregoing Verified Complaint, and that the allegations and factual assertions contained herein are true and correct to the best of my knowledge, information, and belief.

Executed on this 23rd day of May , 2026, at Izmail, Ukraine.

Henri Bryant Lanier Sr. Esq. phD

By: _____

Henri Bryant Lanier Sr., Esq., Ph.D.

Master Specialist E-9, USASC, 31MX

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Attorney for Plaintiffs

EXHIBIT A

The "Sovereign and Unbroken" Speech

(Attached hereto and incorporated by reference)

Men, listen up. Everything you've heard about the financial system being rigged is a fact. But this is for your ears only. This isn't for the bureaucrats, or the banks, or the soft-handed men in suits who have never carried a ruck, or filled a sandbag, or slept in the freezing mud. We have built something together. A sovereign financial platform. For you. For every real American soldier who raised a right hand and meant every damn word of the oath.

No real American ever wants to stand by while a corrupt system bleeds them dry. Americans love a fight, and we play to win. Look back across two hundred and fifty years of unyielding grit. From the blood-stained snow of Valley Forge, where Washington's men froze but never broke, to the dense woods of the Argonne, where our boys smashed through an unbreakable wall. That is your bloodline. That is your inheritance. When Abraham Lincoln stood at Gettysburg, he promised a government of the people, by the people, and for the people. He didn't say it belonged to the Wall Street syndicates or the political dynasties. He said it belonged to the citizens who fought for it. Somewhere along the line, the system forgot who built the foundation. The institutions became walls to lock you out, run by algorithms that don't know the weight of a pack or the cost of a long deployment.

We are tearing those walls down right now. This is not a political promise. It is not a vague, hollow hope whispered by a candidate looking for a vote. It is steel, it is code, and it is law, running on our own hardware, under our own flag. When you step up, you receive a wallet that cannot be frozen by an executive order, a ledger that cannot be altered by a corporate board, and a trust that cannot be broken by a shift in political winds. No banker will deny you. No algorithm will throttle you. You own it. You control it. That is the first shot fired in a war we should have won long ago—a war for the absolute, unyielding sovereignty of the individual.

Remember the oaths you took. Remember the men who didn't come home, whose names are burned into our memory. Remember the ones who came home broken, waiting years for a claim that should have taken weeks, reduced to a file number in a dusty cabinet while the system they defended looked the other way. General Douglas MacArthur said that old soldiers never die, they just fade away. Well, we refuse to fade. We refuse to be sidelined by a world that reaps the benefits of security while disdaining the guardians who stand the watch.

This platform is your fortress. When you sit at the screen, you will sign five legal documents—the same ironclad instruments that protect any family trust or power of attorney. You type your name, you check the box, and the system hashes your signature into an immutable chain. That is your bond. That is your shield. Upon completion, your account lights up. You receive seventeen thousand USDT and seven hundred and sixty TRX immediately—no waiting, no excuses, and no justification required to some desk-bound compliance officer who

has never left an air-conditioned office. And every fourteen days, your designated beneficiary—your son, your daughter, the legacy you are protecting—receives another 17,076 USDT. Twenty-six times a year. Year after year. Because you already paid the entry fee. You paid it in advance, in blood, sweat, and the best years of your life.

This is not just a wallet. This is an arsenal. You have a U.S. Flag Checkbook to write your own instruments and dictate your own terms. A smart contract bridge to seal any agreement without a middleman standing in your way. A photo OCR node that turns a picture of a check into a live, unassailable account entry. A tax matrix so you see every withholding clearly, stripped of bureaucratic lies. A ledger explorer so you can audit every single block, because true security requires absolute transparency. There is a notepad for your orders, a code editor for the bold, and a live map of the seventeen teams and seventeen locations standing watch with you across the United States—from Fort Liberty to Fort Bliss, from San Diego to Savannah. Every tool you need to fight the good fight, to care for your family, to stand tall in a world that forgot what honor means. Port 8080. Any browser. Your flag on the screen.

Before the Fourth of July—the day we remind the world exactly what freedom costs, and that it was never given, only taken—we will give you more. We will deliver a veteran phone book to keep your battle buddies close, bypassing the commercial networks that track your every move. A file manager like Google Drive, but built without corporate spies and data miners. A mapping tool to see trusted ground, plotted by men who know how to read terrain. A personal AI agent that remembers everything you do—no cloud, no subscription, no foreign eyes monitoring your thoughts. Voice and video calls, one-click publishing to your own domain, all of it free from interception. Because every feature that some Silicon Valley conglomerate puts behind a paywall, we put behind your service record. You earned it. We are just delivering the keys to the kingdom.

President Theodore Roosevelt spoke of the man in the arena—the one whose face is marred by dust and sweat and blood, who strives valiantly, and who, if he fails, at least fails while daring greatly. The arena is no longer just a muddy trench or a dark highway. The arena is the digital architecture of the modern world, and we are done letting our adversaries dictate the rules of engagement.

So this is the call. Stand up. Log in. Show the children that we did not march into the fire for nothing. Show the families that we can build a better way—not with charity, not with handouts, but with law, with code, with unyielding sovereignty. The system goes live on the Fourth of July. That is not just a date on a calendar. That is a declaration of independence from every centralized power that seeks to diminish your autonomy. From the halls of Montezuma to the shores of Tripoli, from the frozen Chosin to the sands of Fallujah, every soldier who ever stood a post, walked a perimeter, or guarded the line now has a financial home that respects your service. No more waiting. No more denials. No more usury. You are a soldier. You have earned this. Now go take it. Sovereign and unbroken. Hooah.