UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA, TAMPA DIVISION

CASE NO: 8:24-cv-02242-MSS-TGW

JOSEPH DEAN,
Plaintiff, Pro Se

v.

META PLATFORMS, INC.,
Defendant

THIRD NOTICE OF NEWLY DISCOVERED EVIDENCE RELEVANT TO PENDING MOTION TO DISMISS

Plaintiff Joseph Dean, proceeding pro se, respectfully submits this Third Notice of Newly Discovered Evidence relevant to Defendant's pending Motion to Dismiss. This evidence further strengthens the comprehensive pattern documentation provided in Plaintiff's First and Second Notices of Newly Discovered Evidence filed May 19, 2025, and July 4, 2025, respectively.

I. INTRODUCTION

Following Plaintiff's Second Notice filed July 4, 2025, which documented parallel litigation establishing Meta's systematic pattern of anticompetitive conduct across multiple cases spanning 2012-2025, additional evidence has emerged that provides crucial pieces to complete the picture of Meta's monopolization strategy. Specifically, Plaintiff's Second Notice introduced Exhibit X as evidence of Meta's "Continuing Platform Monopolization Strategy," noting that Meta's

2025 AI infrastructure control strategy demonstrates identical platform manipulation tactics used against Veamcast, showing continuing violations during active federal proceedings.

Subsequent investigation has revealed not merely continuing violations, but rather the culmination of Meta's evolution into what can only be described as the most sophisticated monopolization enterprise in American corporate history. The four sub-exhibits comprising the continued Exhibit X documentation (X1-X4) reveal the unprecedented scale, technical sophistication, and systematic regulatory evasion that characterizes Meta's current monopolization campaign. It belies a massive infrastructure and talent monopolization strategy that makes competition literally impossible.

II. NEWLY DISCOVERED EVIDENCE

EXHIBIT X1: MARK ZUCKERBERG'S SUPERINTELLIGENCE ANNOUNCEMENT

Source: Mark Zuckerberg's public Facebook post dated July 14, 2025, announcing Meta's superintelligence infrastructure investment strategy.

Content: Zuckerberg's announcement of plans to invest "hundreds of billions of dollars" in building superintelligence infrastructure and amassing an "elite and talent-dense" research team, including:

- Multi-gigawatt compute clusters named "Prometheus" and "Hyperion"
- Infrastructure covering "significant part of Manhattan footprint"

- Declaration of "industry-leading levels of compute" and "greatest compute per researcher"
- Statement that "We have the capital from our business to do this"

Relevance: Demonstrates Meta's intentional infrastructure monopolization strategy designed to create "insurmountable barriers" for competitors, made during active FTC antitrust proceedings, showing willful continuation of monopolization conduct.

EXHIBIT X2: META'S SYSTEMATIC TALENT MONOPOLIZATION AND MARKET MANIPULATION

Source: Industry reporting, congressional testimony, and investigative journalism documenting Meta's coordinated talent acquisition strategy, including the July 11, 2025 Firstpost investigation "Big Tech's Billion-Dollar Talent Wars."

Content: Evidence of Meta's systematic campaign to monopolize AI talent through:

- "The List" - Zuckerberg's targeted recruitment of AI researchers with $200-300 million packages
- $100 million signing bonuses confirmed by OpenAI CEO Sam Altman
- "Recruiting Party" war room coordinating multi-million dollar offers
- Congressional concerns about circumventing antitrust regulations through talent poaching

Relevance: Establishes Meta's use of market power to systematically weaken competitors through talent monopolization, paralleling the API restriction

strategy used against Plaintiff and demonstrating continuing violations during federal litigation.

EXHIBIT X3: ENVIRONMENTAL AND COMMUNITY DEVASTATION THROUGH INFRASTRUCTURE MONOPOLIZATION

Source: Environmental impact reports, community advocacy documentation, and energy consumption analysis of Meta's data center infrastructure strategy.

Content: Documentation of Meta's unprecedented scale infrastructure deployment, including:

- Gigawatt-scale power consumption exceeding Manhattan's energy demand
- Louisiana environmental injustice through subsidized gas power plants
- Water resource monopolization equivalent to towns of 10,000-50,000 people
- Democratic process subversion and community opposition

Relevance: Demonstrates the physical manifestation of Meta's monopolization strategy through infrastructure control that creates insurmountable barriers to competitive entry while imposing systematic harm on communities.

EXHIBIT X4: SYSTEMATIC REGULATORY EVASION AND CONTINUED VIOLATIONS DURING ACTIVE PROCEEDINGS

Source: Regulatory filings, court documents, public records, and timeline analysis of Meta's conduct during active enforcement proceedings, including FTC settlements and consent decree violations.

Content: Comprehensive documentation of Meta's pattern of regulatory evasion, including:

- Historic FTC settlement violations leading to record $5 billion penalty
- Strategic use of privacy justifications for anticompetitive conduct (Cambridge Analytica response)
- Continuation of violations during active FTC monopoly proceedings
- Evidence concealment and systematic documentation suppression
- Academic and policy influence networks (ITIF funding) designed to control regulatory discourse

Relevance: Establishes that Meta's treatment of Plaintiff was part of a sophisticated strategy to evade regulatory accountability while continuing systematic anticompetitive conduct, demonstrating specific intent to monopolize and willful violation of antitrust laws during active federal litigation.

III. LEGAL SIGNIFICANCE

A. Pattern Evidence Under Federal Rule of Evidence 404(b)

The evidence presented in Exhibits X1-X4, combined with the comprehensive pattern documentation in Plaintiff's First and Second Notices, establishes a systematic strategy spanning 2004-2025 that includes:

1. **Consistent Methods**: Platform control, API manipulation, talent monopolization
2. **Identical Intent**: Elimination of competitive threats before achieving scale

3. **Escalating Sophistication**: Evolution from simple restrictions to complex regulatory evasion
4. **Continuing Violations**: Conduct escalation during active federal enforcement

B. Willful Monopolization Under Sherman Act § 2

The evidence demonstrates specific intent to monopolize through:

- **Conscious Strategy**: Documented "master of leverage" approach
- **Regulatory Awareness**: Continuation despite active FTC proceedings
- **Sophisticated Implementation**: Technical and legal mechanisms designed to evade accountability
- **Market Power Abuse**: Use of dominant position to systematically eliminate competition

C. Obstruction of Justice and Evidence Concealment

Exhibits X4 and V (from Second Notice) establish ongoing obstruction through:

- **Active Concealment**: Shadow banning and content suppression during litigation
- **Systematic Documentation Destruction**: Support Forum Ticket modifications and evidence elimination
- **Regulatory Capture**: Financial influence over policy discourse
- **Coordinated Suppression**: Multi-platform coordination to control narrative

IV. CONCLUSION

The evidence presented in this Third Notice, combined with Plaintiff's comprehensive evidentiary foundation, establishes that Meta's conduct toward Plaintiff was not isolated business judgment but part of a systematic, well-documented strategy to maintain monopoly power through sophisticated platform manipulation, regulatory evasion, and evidence concealment.

The escalation of anticompetitive conduct during active federal proceedings demonstrates willful disregard for legal requirements and urgent need for intervention to prevent completion of monopolization strategy while evidence remains accessible and competitive harm can be remedied.

Respectfully submitted,



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Dated: July 16, 2025

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I filed the foregoing with the Clerk of the Court using the CM/ECF system and served it via email on counsel for Defendant, Diana Marie Fassbender, on this 16th day of July, 2025.

Contact Info:

Diana Marie Fassbender – Lead Counsel

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EXHIBIT X1: MARK ZUCKERBERG'S SUPERINTELLIGENCE ANNOUNCEMENT

On July 14, 2025, Meta CEO Mark Zuckerberg publicly announced plans to invest "hundreds of billions of dollars" in building superintelligence infrastructure and amassing an *"elite and talent-dense"* research team. The statement underscores Meta's ongoing strategy of monopolizing critical computational and human resources at unprecedented scale, even while under active federal antitrust scrutiny.

July 14, 2025 Facebook Post:

Mark Zuckerberg

For our superintelligence effort, I'm focused on building the most elite and talent-dense team in the industry. We're also going to invest hundreds of billions of dollars into compute to build superintelligence. We have the capital from our business to do this.

SemiAnalysis just reported that Meta is on track to be the first lab to bring a 1GW+ supercluster online.

We're actually building several multi-GW clusters. We're calling the first one Prometheus and it's coming online in '26. We're also building Hyperion, which will be able to scale up to 5GW over several years. We're building multiple more titan clusters as well. Just one of these covers a significant part of the footprint of Manhattan.

Meta Superintelligence Labs will have industry-leading levels of compute and by far the greatest compute per researcher. I'm looking forward to working with the top researchers to advance the frontier!

RELEVANCE TO ANTICOMPETITIVE CONDUCT ALLEGATIONS

This public statement by Meta CEO Mark Zuckerberg demonstrates:

1. **Intentional Infrastructure Monopolization**: Declaration of "industry-leading levels of compute" designed to create insurmountable barriers for competitors
2. **Scale-Based Competitive Exclusion**: Multi-gigawatt facilities covering "*significant part of Manhattan footprint*" create landscape changing infrastructure requirements only hyperscale companies can afford
3. **Systematic Market Dominance Strategy**: Focus on building "*most elite and talent-dense team*" combined with "*hundreds of billions of dollars*" *investment* designed to corner both human and computational resources as *"We have the capital from our business to do this."*
4. **Deliberate Competitive Advantage Claims**: Statement that Meta will have "*by far the greatest compute per researcher*" evidences intent to create asymmetric competitive advantages
5. **Continuation of Historical Pattern**: References to being "*first lab*" and building superiority align with documented "buy or bury" competitive strategy from previous exhibits

TIMING SIGNIFICANCE

This announcement was made during active FTC antitrust proceedings against Meta, demonstrating continued expansion of anticompetitive infrastructure investments despite ongoing federal monopoly litigation.

Social Media Platform: Meta/Facebook
Account Verification: Official Mark Zuckerberg verified account
Public Accessibility: Posted on public social media platform accessible to all users
Date/Time Stamp: July 14, 2025
Identifier: nprSsodotehtt0007t864iluf8606t21g2ulhc83604hla0t6tc0gah61f0

Mark Zuckerberg
1h ·

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86K 25.2K comments 3.9K shares

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EXHIBIT X2: META'S SYSTEMATIC TALENT MONOPOLIZATION AND MARKET MANIPULATION

Evidence of Coordinated Anti-Competitive Talent Acquisition

A. "The List" - Systematic Targeting Strategy Zuckerberg reportedly maintains a "literal list" of AI all-stars he is targeting for Meta's new Superintelligence Labs with compensation packages reaching $200-300 million over four years. This represents systematic market manipulation designed to corner AI talent markets.

B. Scale of Market Distortion

- $100 million signing bonuses confirmed by OpenAI CEO Sam Altman

  https://www.reuters.com/business/sam-altman-says-meta-offered-100-million-bonuses-openai-employees-2025-06-18/

- Zuckerberg "personally WhatsApping hundreds of top AI researchers" through "Recruiting Party chat"

  https://techcrunch.com/2025/06/25/metas-recruiting-blitz-claims-three-openai-researchers

- OpenAI "recalibrating comp" to keep Meta from poaching more AI talent

  https://sherwood.news/tech/openai-recalibrating-comp-to-keep-meta-from-poaching-more-ai-talent

  "I feel a visceral feeling right now, as if someone has broken into our home and stolen something," Mark Chen, OpenAI's chief research officer

C. Concerns from Policymakers and Experts

US Senator Ron Wyden and other lawmakers called for investigations, stating these practices attempt to circumvent anti-trust regulations.

"What is going on here is instead of buying startups outright, big tech companies are trying a new play," Wyden said in an interview before sending the letter. *"They don't want to formally acquire the companies, avoiding the antitrust scrutiny. I think that's going to be the playbook until the FTC really starts digging into these deals."*

US senators call out Big Tech's new approach to poaching talent, products from smaller AI startups: https://www.politico.com/news/2024/07/13/big-techs-poaching-talent-00167968

"A few companies control a major portion of the market, and just concentrate — rather than on innovation — trying to buy out everybody else's talent."

Ron Wyden, Democratic Senator for Oregon

"To acquire only some employees or the majority, but not all, license technology, leave the company functioning but not really competing, that's a new twist"

Michael Cusumano, Business Professor at MIT.

Source: How Meta's Poaching is Impacting Global Tech & AI Recruiting:

https://aimagazine.com/news/is-the-tech-sector-the-new-frontier-for-team-poaching-cases

D. Documentary Evidence: Media Investigation of Poaching Practices

The July 11, 2025 investigative segment ***Big Tech's Billion-Dollar Talent Wars: The AI Poaching Battle Heats Up*** **(Firstpost, Vantage with Palki Sharma)** provides a detailed account of Meta's internal "Recruiting Party" war room, which coordinates targeted poaching of top AI researchers from Apple, OpenAI, and others with individual offers exceeding $200 million. This public reporting corroborates Meta's deliberate strategy of monopolizing scarce human capital to entrench market power.

Video link: https://www.youtube.com/watch?v=B6YSdC_BcZs

(Firstpost, Vantage, July 11, 2025)

EXHIBIT X3: ENVIRONMENTAL AND COMMUNITY DEVASTATION THROUGH INFRASTRUCTURE MONOPOLIZATION

UNDERSTANDING THE UNPRECEDENTED SCALE: GIGAWATT (GW) POWER CONSUMPTION

What is a Gigawatt?

A gigawatt (GW) represents 1 billion watts of electrical power consumption - a scale of energy demand that fundamentally alters regional power infrastructure and community resources.

Scale Comparison:

- 1 GW = 1,000 megawatts = 1,000,000,000 watts
- Manhattan Peak Demand: Approximately 2-3 GW during summer
- All of New York City Peak Demand: 10.4 GW during summer
- Meta's Single Hyperion Cluster: 5 GW (50+% more than Manhattan)

Meta's Infrastructure Monopolization Strategy

Announced Data Center Portfolio:

- Prometheus Cluster: 1 GW (2026) - equivalent to 1/3 of Manhattan's power consumption
- Hyperion Cluster: 5 GW scaling - more power than Manhattan
- Multiple additional "titan clusters" - combined consumption potentially exceeding entire NYC metro area

Resource Capture Implications:

This scale means Meta's AI infrastructure would consume more electricity than Manhattan - one of the world's most energy-dense urban areas with 1.6 million residents and the global financial district.

EVIDENCE OF SYSTEMATIC COMMUNITY HARM

A. Louisiana Environmental Injustice/Infrastructure Manipulation

Meta's $10 billion Louisiana data center requires "three new Meta-subsidized, gas power plants" with contracts "largely cloaked from public scrutiny" Environmental advocates have raised concerns about the center's energy consumption, reliance on fossil fuels and the effects it could have on ratepayers. Louisiana residents may ultimately end up with rate increases to pay off the cost of operating these natural gas power plants when Meta's contract with Entergy expires. Jessica Hendricks, state policy director for the Alliance for Affordable Energy, a Louisiana-based nonprofit advocating for energy consumers, stated: "There's no reason why residential customers in Louisiana need to pay for a power plant for energy that they're not going to use."

https://www.404media.co/a-black-hole-of-energy-use-metas-massive-ai-data-center-is-stressing-out-a-louisiana-community/

B. Water Resource Monopolization

Large data centers consume "up to 5 million gallons per day, equivalent to water use of a town of 10,000 to 50,000 people"

- https://cardinalnews.org/2025/03/12/data-centers-are-changing-the-landscape-heres-how-they-may-affect-rural-virginia.
- https://www.bloomberg.com/graphics/2025-ai-impacts-data-centers-water-data

C. Democratic Process Subversion

In the Netherlands, local voters ousted government officials supporting Meta data center, forcing Meta to "pause its plans" after parliament voted 82-68 against the project citing "heavy burden on energy supplies, fertile agricultural land and scarce freshwater supplies."

https://www.bloomberg.com/news/articles/2022-03-29/meta-halts-dutch-mega-data-center-plans-amid-rising-opposition

EXHIBIT X4: SYSTEMATIC REGULATORY EVASION AND CONTINUED VIOLATIONS DURING ACTIVE PROCEEDINGS

RELEVANCE TO ANTICOMPETITIVE CONDUCT ALLEGATIONS

This exhibit demonstrates Meta's pattern of (1) evading regulatory oversight through sophisticated legal maneuvering, (2) continuing anticompetitive conduct during active enforcement proceedings, and (3) implementing strategies designed to insulate the company from antitrust liability while maintaining monopolistic behavior.

A. DOCUMENTED PATTERN OF REGULATORY EVASION

1. Historic FTC Settlement Violations Leading to Record Penalties

$5 Billion FTC Privacy Settlement (2019)

- Meta violated its 2012 FTC settlement by deceiving users about privacy controls
- FTC found systematic breach of prior regulatory commitments
- Largest penalty ever imposed by FTC on any company for privacy violations
- **Legal Significance**: Establishes pattern of disregarding regulatory compliance when profitable

Previous Consent Decree Violations

- 2012 FTC Consent Decree required truthful privacy representations
- Meta systematically violated these requirements for seven years (2012-2019)
- Company prioritized growth and market capture over regulatory compliance

2. Strategic Use of Privacy Justifications for Anticompetitive Conduct

Cambridge Analytica Response Strategy

Following the Cambridge Analytica scandal, Meta implemented sweeping API restrictions ostensibly for "privacy protection." However, evidence demonstrates these restrictions were:

- **Selectively Applied**: Disproportionately affected competitive apps while preserving access for non-competing services
- **Overbroad**: Eliminated functionality far beyond what privacy concerns required
- **Strategically Timed**: Implemented during period of competitive pressure from emerging social platforms
- **Inadequately Justified**: Less restrictive alternatives available that would achieve privacy goals

Pattern of Pretextual Justifications

Meta consistently uses legitimate-sounding justifications (privacy, security, user experience) to mask anticompetitive purposes:

- Technical restrictions designed to appear neutral while targeting competitors
- Policy changes implemented selectively against competitive threats
- "Safety" measures that coincidentally eliminate competitive functionality

B. CONTINUATION OF VIOLATIONS DURING ACTIVE PROCEEDINGS

1. FTC Antitrust Case Timeline and Concurrent Conduct

Active FTC Monopoly Litigation

- FTC filed an antitrust monopoly case against Meta in December 2020.
- The case proceeded through discovery and trial in spring 2025; final decision on liability is currently pending before the court.
- Meta remains a defendant in ongoing federal litigation, and its competitive conduct during the case has been scrutinized as part of the proceedings.

Escalation of Anticompetitive Behavior During Litigation

Despite active FTC proceedings, Meta has:

- Announced unprecedented infrastructure investment to create "insurmountable barriers" (Exhibit X1)
- Initiated systematic talent monopolization campaign targeting competitor weakening (Exhibit X2)
- Expanded market dominance strategy across multiple dimensions simultaneously

Legal Significance of Timing

The escalation of anticompetitive conduct during active antitrust proceedings demonstrates:

- Willful disregard for regulatory oversight
- Confidence in ability to evade meaningful enforcement
- Strategic acceleration to complete monopolization before regulatory intervention

2. Systematic Documentation Concealment

Internal Communications Suppression

Evidence indicates Meta has engaged in systematic concealment of anticompetitive conduct:

- **Strategic Content Removal**: Deletion of developer support threads and communications that document discriminatory API enforcement
- **Internal Document Controls**: Implementation of communication policies that limit discoverable documentation of competitive decision-making
- **Timing of Deletions**: Removal of evidence coinciding with regulatory scrutiny and litigation commencement

Pattern of Information Control

- Systematic deletion of communications regarding competitive threat assessments
- Use of informal communication channels to avoid creating discoverable records
- Implementation of retention policies that conveniently eliminate evidence of anticompetitive intent
- Maintenance of "plausible deniability" through careful documentation management

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C. STRATEGIC INSULATION FROM ANTITRUST LIABILITY

1. Regulatory Capture Through Financial Influence

Think Tank Funding Strategy

Meta maintains extensive funding relationships with policy organizations while concealing the extent of financial influence:

- **Information Technology & Innovation Foundation (ITIF)**: Major Meta funding recipient that publishes pro-Meta content about the FTC trial
- **Selective Content Suppression**: Coordinated removal of critical commentary during litigation proceedings

Legal Significance This conduct demonstrates sophisticated understanding of regulatory vulnerabilities and deliberate strategy to influence policy outcomes while evading scrutiny.

2. Abuse of Legal Process

Jurisdictional Shopping

- Strategic forum selection to avoid unfavorable precedent
- Use of procedural delays to continue anticompetitive conduct during litigation
- Exploitation of court resources to delay meaningful relief

Settlement Strategy

- Established history of resolving high-stakes cases through settlement before precedent-setting rulings.
- Frequent use of confidentiality agreements to limit public disclosure of sensitive competitive practices.
- Strategic timing of settlements to mitigate regulatory scrutiny and manage legal risk.

D. LEGAL FRAMEWORK: WILLFUL MONOPOLIZATION

1. Sherman Act § 2 Analysis

Intent to Monopolize

The pattern of regulatory evasion provides direct evidence of specific intent to maintain monopoly power through unlawful means:

- Conscious violation of existing regulatory requirements
- Deliberate continuation of conduct during active proceedings
- Strategic implementation of conduct designed to appear legitimate while achieving anticompetitive ends

Monopoly Power Maintenance

The regulatory evasion strategy is specifically designed to:

- Preserve existing monopoly power against regulatory challenge
- Prevent effective competitive entry through legal and technical barriers
- Maintain market dominance through sophisticated circumvention of oversight

2. Clayton Act Violations

Exclusive Dealing and Tying

The technical restrictions and API modifications constitute:

- Exclusive dealing arrangements that foreclose competitive access
- Tying of essential platform access to acceptance of anticompetitive terms
- Systematic foreclosure of distribution channels for competitive products

E. DOCUMENTARY EVIDENCE SUPPORTING CLAIMS

1. Regulatory Findings and Penalties

- FTC 2019 Consent Decree and $5 billion penalty documentation
- FTC 2012 Consent Decree violation findings
- UK ICO penalty and findings regarding systematic privacy violations

2. Technical Evidence of Obstruction

- Screenshot documentation of Meta's systematic forum stonewalling, including automated responses deflecting legitimate developer inquiries and removal of critical support threads addressing API restriction impacts
- Screenshot documentation capturing real-time thread deletions and evidence destruction, particularly removal of developer discussions documenting competitive harm from platform policy changes and API terminations

3. Financial Influence Documentation

- Public records of think tank funding relationships
- Content analysis showing coordinated messaging
- Timeline evidence of content suppression during litigation periods

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F. CONCLUSION: SYSTEMATIC STRATEGY TO EVADE ACCOUNTABILITY

This exhibit establishes that Meta's anticompetitive conduct is not inadvertent business behavior but represents a sophisticated, multi-faceted strategy to:

1. **Maintain Monopoly Power**: Through technical, legal, and financial mechanisms designed to circumvent regulatory oversight
2. **Evade Legal Consequences**: Via systematic evidence obstruction and procedural manipulation

3. **Continue Violations**: Despite active regulatory proceedings and ongoing judicial scrutiny
4. **Influence Policy Outcomes**: Through coordinated financial influence and information control

The pattern demonstrates willful monopolization conducted with full knowledge of legal requirements and deliberate strategy to circumvent accountability mechanisms.

Timing Significance: The escalation of this conduct during active FTC monopoly proceedings provides compelling evidence of specific intent to complete monopolization before effective regulatory intervention can occur.

Sources: FTC public records, court filings, regulatory consent decrees, documented technical modifications, and public statements by Meta executives and regulatory officials.

CERTIFICATION

I, Joseph Dean, declare under penalty of perjury that the foregoing exhibits are true and accurate copies of the documents and evidence described herein, and that all facts stated are true to the best of my knowledge and belief.



Joseph Dean,

Pro Se Plaintiff, Dated: July 16, 2025