

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CABLE NEWS NETWORK, INC.,

Plaintiff,

v.

PERPLEXITY AI, INC.,

Defendant.

Civil Action No. 1:26-cv-4427

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff Cable News Network, Inc. (“CNN”), by and through its attorneys, Rothwell, Figg, Ernst & Manbeck, P.C., respectfully brings this Complaint against Defendant Perplexity AI, Inc. (“Perplexity” or “Defendant”).

NATURE OF THE ACTION

1. Since its founding in 1980, CNN has transformed modern journalism. As the first cable news network to provide continuous, 24-hour coverage, CNN pioneered live reporting of major events from around the world. For more than four decades, CNN has invested heavily in original reporting that would not exist absent CNN’s commitment to journalism and newsgathering. CNN’s history reflects that commitment. In 1986, CNN was the only network broadcasting live coverage of the Space Shuttle Challenger disaster. Forty years later, in 2026, CNN was one of the few major news organizations reporting directly from Tehran during the war in Iran. CNN’s ability to deploy correspondents across the globe—often in dangerous and rapidly evolving conditions—demonstrates its longstanding dedication to accurate, timely, and on-the-ground reporting. Through its large-scale and unlawful copying and distribution of CNN’s copyrighted content, Perplexity has appropriated the benefits of CNN’s substantial investments in journalism to develop and market

competing commercial products, without authorization or compensation. By exploiting CNN's reporting in this manner, Perplexity violates the protections afforded by copyright law and undermines the economic incentives that make original newsgathering possible. CNN brings this action to hold Perplexity accountable for its unlawful conduct.

2. Perplexity is a generative artificial intelligence (“GenAI”) company that describes its namesake chatbot as an “answer engine.”¹ According to Perplexity, “[w]hen you ask Perplexity a question, it uses advanced AI to search the internet in real-time, gathering insights from top-tier sources. It then distills this information into a clear, concise summary, delivering exactly what you need in an easy-to-understand, conversational tone.”² Perplexity explains that once it “interpret[s] your question,” it then “searches the internet, gathering information from authoritative sources like articles, websites, and journals.”³ What Perplexity characterizes as “gathering” involves copying news and other content and combining it with a Large Language Model (“LLM”) to produce lengthy and expressive output derived from copyrighted content that is owned by others. By doing this work, Perplexity purports to save users’ time and energy and eliminate the need for its users themselves to visit the websites from which Perplexity derives its “answers.”⁴

3. In describing “what sets Perplexity apart,” Perplexity touts that while “[t]raditional search engines present you with lots of links to sift through. Perplexity functions as an intelligent research assistant, streamlining your information gathering by delivering the precise knowledge you

¹ Perplexity, *Getting Started*, <https://www.perplexity.ai/hub/getting-started> (last visited May 27, 2026).

² Perplexity, *How does Perplexity work?*, <https://www.perplexity.ai/help-center/en/articles/10352895-how-does-perplexity-work> (last visited May 27, 2026).

³ *Id.*

⁴ Perplexity Team, *Getting Started with Perplexity*, Perplexity (Oct. 1, 2024), <https://www.perplexity.ai/hub/blog/getting-started-with-perplexity>.

need without the extra steps and clicks.”⁵ To bypass the “extra steps and clicks,” upon information and belief, Perplexity accesses as much content as it can from CNN and other sources of trusted, original, and reliable information. Indeed, as recently as August 2024, Perplexity boasted that its “answer engine” allowed users to “Skip the links” by providing “a single, comprehensive answer that summarizes everything you need to know.” *See Dow Jones & Co., Inc. & NYP Holdings, Inc. v. Perplexity AI, Inc.*, No. 1:24-cv-07984-KPF, at Dkt. 46 n.1 (S.D.N.Y. Jan. 28, 2025). Although Perplexity appears to have removed the “Skip the links” catchphrase from its promotional material, this core practice remains.

4. Perplexity then makes copies of that content to store in its “AI-First” search index and to feed to its suite of retrieval-augmented generation or “RAG” products, including its consumer chatbot, referred to by Perplexity as its “answer engine”;⁶ enterprise chatbot;⁷ application programming interfaces (“APIs”);⁸ and personal assistants (*e.g.*, the Comet browser)⁹ (collectively, “Perplexity’s GenAI Products”). Perplexity then repackages the original content in written responses to users. Those responses, or outputs, often are verbatim or near-verbatim reproductions, summaries, or abridgements of the original content, including CNN’s copyrighted works.

5. Although Perplexity has a free standard tier, it offers paid plans, including Perplexity Pro, Enterprise Pro, and Enterprise Max. These paid plans offer, *inter alia*, “deeper sourcing from Perplexity’s index,” “search across the web, team files, and work apps,” “2x file uploads,” and “deep

⁵ Perplexity, *What is Perplexity*, <https://www.perplexity.ai/help-center/en/articles/10352155-what-is-perplexity> (last visited May 27, 2026).

⁶ Perplexity, *Answer Engine*, <https://www.perplexity.ai/> (last visited May 27, 2026).

⁷ Perplexity, *Enterprise*, <https://www.perplexity.ai/enterprise> (last visited May 27, 2026).

⁸ Perplexity, *API Platform*, <https://www.perplexity.ai/api-platform> (last visited May 27, 2026); Perplexity Research, *Architecting and Evaluating an AI-First Search API* (Sept. 25, 2025), <https://research.perplexity.ai/articles/architecting-and-evaluating-an-ai-first-search-api>.

⁹ Perplexity, *Comet*, <https://www.perplexity.ai/comet> (last visited May 27, 2026).

research at any scale.”¹⁰ Perplexity solicits users by touting its news gathering abilities, sending unprompted emails with the following solicitation:

Perplexity is built for fast, verifiable answers

Here are some popular ways to use Perplexity.

Start searching

Summarize my calendar for today and tell me what I need to prepare for >

I have a job interview Thursday. Help me prep with common questions and strong answers >

Break down the pros and cons of renting vs buying in my city right now >

Give me a rundown of the top news stories in the world right now and how it impacts my industry >

6. Perplexity’s chatbot provides suggestions for how its chatbot can be used to gather news. For example, if you ask Perplexity’s chatbot, “Can Perplexity help gather news?” Perplexity responds with the following:

If you want, I can:

- Walk you through a sample query and show how to phrase it for better results.
- Draft the exact Daily Briefing settings or query templates for topics you care about (finance, politics, local news).
- Outline a simple automated pipeline (commands and outputs) to pull news into a spreadsheet or JSON feed.

Which of the three would you like to do next, and what topic(s) should we focus on?

¹⁰ Perplexity, *Enterprise Pricing*, <https://www.perplexity.ai/enterprise/pricing> (last visited May 27, 2026).

7. Perplexity's conduct violates CNN's exclusive rights under the Copyright Act at two principal stages: First, at the input stage, Perplexity unlawfully crawls, scrapes, copies, and distributes CNN's content from CNN Digital Platforms and third-party platforms using software programs, including "PerplexityBot" and "Perplexity-User," to build an AI-First search index and to provide CNN's content in real time as input to LLMs to formulate responses to users' prompts. And second, at the output stage, when Perplexity's GenAI Products generate outputs that are identical or substantially similar to CNN's content. Upon information and belief, Perplexity has unlawfully copied over 17,000 CNN stories, videos, images, and other works to power its products and tools.

8. In addition to its massive copyright infringement, Perplexity also violates CNN's trademarks under the Lanham Act by falsely claiming an affiliation between Perplexity and CNN that does not exist. Perplexity's GenAI products generate fabricated content that claims that its users can pay to upgrade and get access to CNN's premium content, when no such option exists. Thus, Perplexity uses CNN's famous, registered trademarks and falsely attributes an affiliation between Perplexity and CNN to its users which causes confusion. Perplexity likewise violates CNN's trademarks under the Lanham Act when its GenAI Products misleadingly omit or modify portions of CNN's content without disclosing those omissions or modifications and display the inaccurate reproductions alongside CNN's famous trademarks. Perplexity also violates CNN's trademarks under the Lanham Act in connection with the generation and distribution of confabulated or "hallucinated" content that Perplexity falsely attributes to CNN. Perplexity's use of CNN's trademarks constitutes false designations of origin, infringement, and dilution by confusing and deceiving Perplexity users into believing that users may lawfully access CNN's content on

Perplexity and/or by generating undisclosed omissions, modifications, or hallucinations that it claims are associated with, sponsored by, or approved by CNN.

THE PARTIES

9. Plaintiff CNN is a global 24-hour news organization that owns and operates numerous news networks and services, including the 24-hour CNN channel in the United States, CNN International globally and CNN en Español. CNN also operates global digital platforms that provide access to original news coverage and other features, which are available on CNN.com; CNN All Access, CNN's subscription digital service; and numerous other international, regional, and specialized digital platforms (collectively, "CNN Digital Platforms"). CNN owns registered copyrights for over 17,000 articles and digital content, including the articles (and other works) contained in the registrations set forth in Exhibit A ("CNN Works").

10. CNN is a Delaware corporation with its principal place of business at 1050 Techwood Drive NW, Atlanta, GA 30303. CNN is ultimately a wholly owned subsidiary of Warner Bros. Discovery, Inc.

11. Defendant Perplexity is a Delaware corporation with its principal place of business at 115 Sansome Street, Suite 900, San Francisco, California 94104.

JURISDICTION AND VENUE

12. This civil action seeks damages, injunctive relief, and other equitable relief under the Copyright Act of 1976, 17 U.S.C. § 101 et seq., and the Lanham Act, 15 U.S.C. § 1051 et seq.

13. This Court has subject matter jurisdiction over this civil action under 28 U.S.C. §§ 1331 and 1338.

14. As set forth in this section and further supported in the "Factual Allegations" below, this Court has personal jurisdiction over Perplexity pursuant to New York Civil Practice Law and

Rules § 302(a)(1)–(4) and the Due Process Clause of the U.S. Constitution. In multiple independently sufficient ways, Perplexity has purposely availed itself of the privilege of doing business in the State of New York and subjected itself to New York’s long-arm jurisdiction.

15. Since April 21, 2023, Perplexity has been registered to do business in the State of New York. Perplexity’s New York Department of State identification number is 6837808.

16. Perplexity uses real property situated within this State and District, including office space in Manhattan, which is utilized for the conduct of its business as outlined in this Complaint. Perplexity states on its website, “You’ll find our teams collaborating in offices across Palo Alto, New York,” among other locations, and “our in-person team members spend 4 days a week in the office”¹¹ On or about February 18, 2025, Perplexity’s Work Experience Manager, Tram Anh Phun, submitted a declaration in the Dow Jones litigation confirming that “Perplexity rents office space from Industrious, a co-working facility, located at 215 Park Avenue South, 11th Floor, New York, New York 10003.” *See Dow Jones*, at Dkt. 49, at 8 (S.D.N.Y. Feb. 18, 2025). As further described below, this Court found Perplexity’s office space in New York, in addition to other factors, to weigh in favor of exercising jurisdiction over Perplexity. *See id.*, at Dkt. 65, 2025 WL 2416401 (S.D.N.Y. Aug. 21, 2025).

17. In February 2026, Perplexity was reported to have expanded its total office space occupancy to 22,000 square feet in Manhattan.¹² Reflecting on its expansive office space, Nathan Barksdale, General Counsel and Vice President of Operations at Perplexity stated: “The connected space gives us the visibility and flexibility we were looking for, and we’re excited to see how it

¹¹ Perplexity, *Help us build the future of discovery*, <https://www.perplexity.ai/hub/careers> (last visited May 27, 2026).

¹² Max Gillepsie, *Perplexity Signs New Lease Spanning 22,000 Square Feet at 841, 853 Broadway in Union Square, Manhattan*, New York YIMBY (Feb. 17, 2026), <https://newyorkyimby.com/2026/02/perplexity-signs-new-lease-spanning-22000-square-feet-at-841-853-broadway-in-union-square-manhattan.html>.

sparks creativity and collaboration among our staff.”¹³

18. Perplexity’s co-founder and Chief Strategy Officer Johnny Ho publicly described how, since its founding, the company benefitted from its presence in New York. In response to a question about whether “there was something that gave you conviction about these individuals to go on the journey [to found Perplexity] with,” Ho stated that “being in New York brought some different perspectives to the company and allowed us to actually work in an a-sync way where all of us have our own ideas and push them together and find something that will align, hopefully not only with a bubble but, like, the entire world.”¹⁴

19. In another interview, Ho further revealed how the only in-person meeting among Perplexity’s three co-founders when starting the company took place in New York: “We got together, like, one time in New York, and we had a whiteboard, and we spent like maybe two or three days together. And that was, like, pretty much the only time that we had in person. Everything else was just like remote.”¹⁵

20. Perplexity actively seeks to expand its presence in New York and take advantage of talent in this State and District. Perplexity’s career webpage prominently features that it has offices in San Francisco and New York City, among other cities. On May 12, 2026, its website listed 23 positions that could be based in New York, including:

- Member of Technical Staff (Software Engineer, Monetization)
- Enterprise Growth Lead
- Solutions Product Marketing Manager

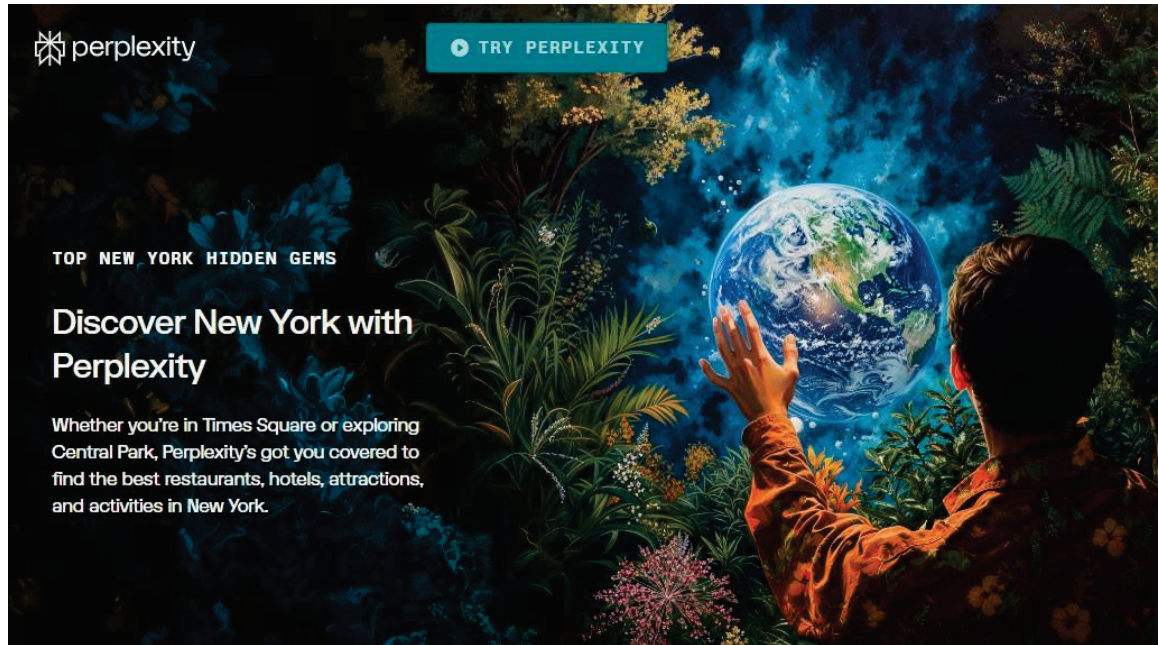
Moreover, positions advertised in other cities could still be staffed out of New York.

¹³ *Id.*

¹⁴ The Room Podcast, *Empowering The Future of Gen AI with Johnny Ho, Co-Founder of Perplexity* | *The Room Podcast S11E1* (Oct. 1, 2024), at 10:02-10:45, <https://www.youtube.com/watch?v=ZWtcsjQ1gQ4>.

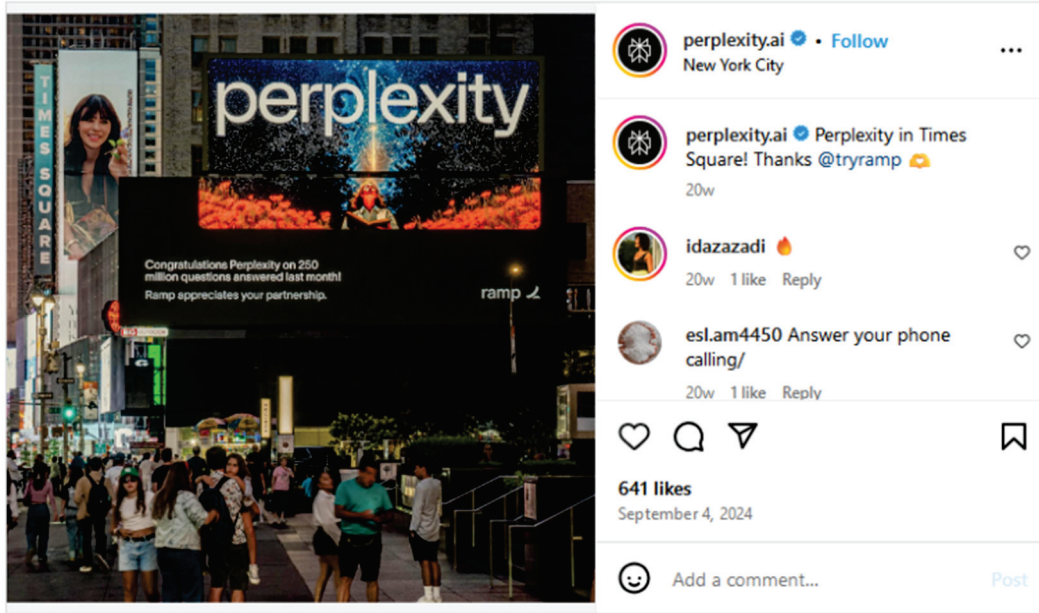
¹⁵ Imagination in Action, *Inside Perplexity AI: A Conversation with Johnny Ho, Cofounder of Perplexity and CSO IIA @ MIT 2025* (Apr. 30, 2025), at 2:55-3:15, <https://www.youtube.com/watch?v=4ibfXV5vYaA>.

21. Perplexity also targets customers in or visiting New York with material tailored specifically to New York. Its webpage <https://www.perplexity.ai/encyclopedia/discovernewyork>, invites visitors to “Discover New York with Perplexity.”



22. Perplexity also promotes itself in New York City. For example, in September 2024, Perplexity posted on Instagram a photograph of a billboard in Times Square which read “Congratulations Perplexity on 250 million questions answered last month.”¹⁶ Below is a screenshot of the Instagram post.

¹⁶ Perplexity [@perplexity.ai], Instagram (Sept. 4, 2024), https://www.instagram.com/perplexity.ai/p/C_g2TonSHC5.



23. Similarly, on January 5, 2024, Perplexity's CEO Aravind Srinivas posted on X a picture of a Tesla Cybertruck emblazoned with Perplexity's name parked in Times Square. Below is a screenshot of the X post.¹⁷



24. Upon information and belief, Perplexity derives substantial revenue from services rendered in this State and District and from interstate commerce. As of November 2025, Perplexity

¹⁷ Aravind Srinivas [@AravSrinivas], X (Jan. 6, 2025, 10:41 PM), <https://x.com/aravsrinivas/status/1876474243921432832?s=46>.

has approximately 22 million active users across its website and app.¹⁸ Upon information and belief, a significant number of these users are in this State and District. Moreover, upon information and belief, and as evidenced by its business operations in this State and District, Perplexity expects or should reasonably expect its business operations, including its actions alleged to be legal violations in this Complaint, to have consequences in the State and District. Indeed, Perplexity is already a party in at least five lawsuits in this District.¹⁹

25. CNN's claims in this Complaint relate to Perplexity's business in this State and District and to the work of its employees in this State and District who create, design, market, and grow Perplexity's products and services. As alleged further in this Complaint, to eliminate "extra steps and clicks," Perplexity infringed on copyrighted works by making unauthorized copies and providing verbatim or substantially similar copies of these copyrighted works in its "answer engine." Moreover, when providing answers to subscribers and users in this State and District, Perplexity will produce fabricated content with misleading omissions or modifications that devalue CNN's valuable trademarks.

26. This Court is also the appropriate forum for this action. Perplexity is already defending lawsuits filed against it in this state and district. In December 2025, The New York Times Company, No. 25-cv-10106-LAP (S.D.N.Y. Dec. 5, 2025), and the Chicago Tribune Company, LLC, No. 25-cv-10094 (S.D.N.Y. Dec. 4, 2025), filed complaints against Perplexity alleging copyright and trademark infringement. In September 2025, Encyclopaedia Britannica, Inc. and Merriam-Webster, Inc. filed a complaint against Perplexity alleging the same. *See Encyclopaedia*

¹⁸ David Curry, *Perplexity Revenue and Usage Statistics* (2025), Business of Apps (Nov. 10, 2025), <https://www.businessofapps.com/data/perplexity-ai-statistics/>.

¹⁹ *See New York Times Co. et al. v. Perplexity, AI, Inc.*, No. 25-cv-10106; *Chicago Tribune Co., LLC v. Perplexity AI, Inc.*, No. 25-cv-10094; *Reddit, Inc. v. SerpApi LLC et al.*, No. 25-cv-8736; *Encyclopaedia Britannica, Inc. et al. v. Perplexity AI, Inc.*, No. 25-cv-07546; *Dow Jones Perplexity AI, Inc.*, No. 24-cv-7984.

Britannica, Inc., No. 25-cv-07546-JLR (S.D.N.Y. Sept. 10, 2025). In January 2025, Dow Jones & Company and NYP Holdings filed their second amended complaint against Perplexity with similar claims. *See Dow Jones*, at Dkt. 46 (S.D.N.Y. Jan. 28, 2025).

27. On August 21, 2025, the *Dow Jones* court denied in full Perplexity’s 12(b)(2), 12(b)(3), and 12(b)(6) motion to dismiss the complaint for lack of jurisdiction, improper venue, and failure to state a claim. *Id.*, at Dkt. 65, 2025 WL 2416401, at *1 (S.D.N.Y. Aug. 21, 2025). The Court further declined to transfer the case to the Northern District of California. *Id.* In reaching these conclusions, the Court recognized Perplexity’s “extensive contacts with this state—such as hiring key employees in New York, leasing office space in New York, and targeting New York users with advertisements and New York-specific webpages, coupled with offering an interactive website and mobile app in New York.” *Id.* at *13.

28. CNN also has substantial operations in New York, including hosting multiple shows from its studios at 30 Hudson Yards in New York with support from more than 800 staffers located there.

29. Finally, venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(a). As described above, Perplexity and/or its agents reside in this District and/or may be found in this State and District.

FACTUAL ALLEGATIONS

I. CNN’s History and Mission

A. CNN’s Revolutionizing News Coverage

30. Plaintiff CNN is known around the world for its 24-hour news coverage from the scenes of the most historic events of our time. When CNN began broadcasting in 1980, it revolutionized the delivery of news to Americans and, ultimately, to the world. As the first 24-hour news network, CNN quickly became the place that viewers could turn for immediate and ongoing

coverage from around the world at any time of day or night. As United Press International noted in 1990: “So ubiquitous is CNN’s live coverage of breaking news events that both broadcast and print newsrooms all over the country continuously monitor the network.”

31. Over ensuing years, Americans have turned to CNN to see for themselves what was happening around the world—from the streets of Baghdad to lower Manhattan on 9/11 and from Hurricane Katrina to Afghanistan, Iraq, Iran, and Ukraine. CNN’s work to give the public an independent view of war and other major world events continues today. Just in the few months preceding this filing, CNN has reported live from conflict zones in Venezuela, Russia, Ukraine, Iran, Lebanon, as well as from the White House, Minneapolis, and provided comprehensive coverage of NASA’s Artemis II launch and landing.

32. This work of reporting the news from around the world and here at home is time-consuming, expensive, and often dangerous. Even at a time when news organizations are under tremendous financial pressure, CNN maintains 36 bureaus around the world and sends reporters to major events wherever they are. Those activities require massive efforts to ensure the safety and effectiveness of the reporters on the ground, including travel, security, legal, and operational support. Every story requires a team of reporters, editors, and support staff to ensure that CNN’s journalism meets the highest standards of quality and accuracy. That work is done by the approximately 3,500 people who work at CNN, most of whom are directly involved with supporting CNN reporting. Without CNN’s continued expenditure of the resources necessary to do this difficult work, the public would be left without a trusted and reliable source for what is happening at home and around the world. In a world becoming inundated with false information and manipulated video content, CNN’s work is more important than ever.

33. In addition to its renowned breaking news coverage, CNN also provides viewers with award-winning investigative reporting and in-depth interviews through a variety of shows and platforms. CNN offers newsmakers and analysts a platform for sharing their opinion and commentary and is known for the skills of its interviewers. CNN anchors and journalists have long been recognized as among the most trusted in America.

34. The quality of CNN's journalism continues to be recognized with awards from its industry peers and other recognition. In 2026, CNN was nominated for 32 News & Documentary Emmy® Awards. In addition to winning multiple Emmy® Awards, CNN and its journalists have also been awarded multiple Peabody Awards; Edward R. Murrow Awards; the George Polk Award; the Four Freedoms Award; and the Alfred I duPont-Columbia Award, one of the most prestigious awards in media, for its coverage in Ukraine.

35. As technologies have changed, CNN has expanded the availability of its news coverage across CNN Digital Platforms. CNN Digital is a top online news destination, routinely registering more than 150 million unique visitors globally each month. CNN Digital Platforms provide access to both CNN video coverage and a wealth of articles providing original news coverage and other features. In 2025, CNN Digital Platforms were first in the United States with an average monthly unique user count of 94 million people for the tenth year in a row. Amidst an industry-wide shift to mobile news consumption, CNN was the news outlet with the most reach in the U.S. in mobile visitors with 67 million average monthly users.

36. As the cable industry evolves, CNN's ability to monetize online content and compete for traffic through CNN Digital Platforms is critical to its continued survival as a news network. In 2024 CNN Digital Platforms introduced a paid subscription service to build a subscription business, offering CNN.com articles. One year later in 2025, that subscription offering expanded with the

addition of streaming video. Audiences can now experience the full multimodal CNN offering through its All Access subscription, a centralized place with live channels, on-demand video, new releases and library content from CNN Original Series and CNN Films, along with the foundational CNN.com articles. The direct-to-consumer subscription offering is available across web, mobile and connected TV apps.

37. Perplexity's actions threaten CNN's continued efforts to provide breaking news and analysis by copying, using, and adapting CNN's content in connection with GenAI products without compensation to CNN. These actions deprive CNN of visits to its Digital Platforms, decrease its subscription revenue, threaten its advertising revenue, and reduce its licensing revenue.

38. CNN goes to great lengths to protect its content. It registers copyrights in its content and provides copyright notices in connection with its works. Beyond the protections provided by the exclusive rights of reproduction, adaptation, publication, performance, and display under copyright law, CNN uses paywalls to protect some of its content and implements terms of service and terms of use that restrict the use of the content provided on CNN Digital Platforms. CNN's terms of use state, "[t]he Site contains copyrighted material, trademarks and other proprietary information, including, but not limited to, text, software, photos, video, graphics, music and sound, and the entire contents of the Site are copyrighted as a collective work under the United States copyright laws."²⁰

CNN's terms of use further provide,

You may not modify, publish, transmit, participate in the transfer or sale, create derivative works, or in any way exploit, any of the content, in whole or in part. You may download copyrighted material for your personal use only. Except as otherwise expressly permitted under copyright law, no copying, redistribution, retransmission, publication or commercial exploitation of downloaded material will be permitted without the express permission of CNN and the copyright owner. In the event of any permitted copying, redistribution or publication of copyrighted material, no changes in or deletion of author attribution, trademark

²⁰ CNN Terms of Use, Mobile Apps/Website Terms of Use, <https://www.cnn.com/terms0> (last visited May 27, 2026).

legend or copyright notice shall be made. You acknowledge that you do not acquire any ownership rights by downloading copyrighted material.²¹

39. CNN requires that any third party that wishes to use its content obtain a license to do so. These licensing agreements allow CNN to control how third parties receive and display its content. CNN licenses its content only under narrowly tailored terms that provide explicit guardrails regarding how and to what extent third parties can use the licensed content.

40. Even under these licensing agreements, third parties are not permitted to “scrape” the content from CNN Digital Platforms, as Perplexity has done without permission. Instead, CNN retains control over how third parties access licensed content by requiring them to use specific channels to obtain CNN content.

B. GenAI Products Threaten High-Quality, On-Scene Reporting

41. It has become more difficult for the public to sort facts from fiction in today’s information ecosystem, as misinformation floods the internet, television, and other media. If CNN and other news organizations cannot produce and protect their independent journalism, there will be a vacuum that no computer or AI can fill.

42. The protection of CNN’s intellectual property is critical to its continued ability to fund world-class reporting in the public interest. If CNN and its peers cannot control the use of their content, their ability to monetize that content will be harmed. With less revenue, news organizations will have fewer journalists able to dedicate time and resources to important, in-depth reporting, which creates a risk that those stories will go untold. Less reporting will be produced, and the cost to society will be enormous.

²¹ *Id.*

43. CNN depends on its exclusive rights of reproduction, adaptation, publication, performance, and display under copyright law to maintain its business and to develop selected markets. CNN maintains paywalls and implements terms of service for CNN Digital Platforms that set limits on the copying and use of its content. To use CNN's content for commercial purposes, a party must first approach CNN about a licensing agreement.

44. Third parties are required to obtain permission before using CNN's content and trademarks for commercial purposes and CNN has licensed its content under negotiated licensing agreements. These agreements help ensure CNN controls how, where, and for how long its content and brand appears and that it receives fair compensation for third-party use.

45. CNN's ability to continue to attract and grow its digital subscriber base and to generate digital advertising revenue depends on the size of CNN's audience and users' sustained engagement directly with CNN Digital Platforms. While CNN permits search engines to access its content for the limited purpose of surfacing it in traditional search results, CNN has never given permission to Perplexity to use its content for GenAI purposes. Inherent in this value exchange is the idea that the search engines will direct users to CNN Digital Platforms, rather than exploit CNN's content to keep users within their own search ecosystem.

46. CNN has never given permission to Perplexity to use its content for GenAI purposes. Perplexity was on notice from multiple sources, including but not limited to CNN's terms of service, that CNN had not given it permission to engage in any use of CNN's content, including its protected paywall content. Perplexity was also put on notice by direct communications between CNN and Perplexity. CNN and Perplexity negotiated a term sheet effective October 1, 2025, for a CNN - Perplexity Comet Plus Partnership, with an agreement to finalize the contract within sixty days. Part of that term sheet would have allowed Perplexity to access CNN paywalled content for its Comet

Plus users in exchange for compensation to CNN for its use of that content. On October 2, 2025, Perplexity touted its agreement with CNN, stating the agreement would give “Comet users access to outlets like CNN”²² In promoting this agreement, Mr. Srinivas told Business Insider, “We have always been clear that a product like ours required high-quality sources to exist on the web.”²³ Perplexity stated its “goal with Comet is to help people avoid low-quality content and focus on meaningful, high-quality sources for research.”²⁴

47. CNN’s short form agreement did not lead to a final agreement between the parties due to the inability to agree on multiple issues, including limits on Perplexity’s use of CNN content in its answers to users. The parties agreed to terminate the term sheet effective November 24, 2025. Both before and after Perplexity’s negotiations with CNN, CNN had blocked PerplexityBot from accessing its content. As a result, before and after Perplexity’s negotiations with CNN, Perplexity knew that it was not permitted to access CNN’s content or to use its trademarks or service marks.

48. On December 10, 2025, CNN wrote to Perplexity’s Head of Legal and Operations (now General Counsel) Nathan Barksdale demanding that Perplexity cease its unauthorized use of CNN’s name, service marks, and content. CNN made plain to Perplexity in its letter that its activity was illegal, that CNN had not given Perplexity permission to use any of its content, and the consequences of Perplexity continuing to engage in this activity:

CNN’s content is copyrighted and proprietary to CNN, and CNN has valuable rights in and to the CNN Marks and content, which are protected by law. Such rights include the exclusive right to reproduce, adapt, distribute, and sell copies of the CNN content to third parties and the exclusive right to use the CNN Marks. As you know, CNN has not granted Perplexity permission to use the CNN content or CNN Marks in connection with Perplexity services or for any other purpose, and any such use constitutes a violation of CNN’s rights under copyright and trademark law. Please be

²² *No more slop: Perplexity makes its \$200 AI browser free*, Business Insider (Oct. 2, 2025), <https://www.businessinsider.com/perplexity-makes-200-ai-browser-free-to-battle-ai-slop-2025-10>.

²³ *Id.*

²⁴ *Id.*

assured that CNN considers this a serious matter. By this notice, CNN hereby demands that Perplexity immediately cease and desist from any further unauthorized copying, exhibition, distribution, or other use, in any manner, of any CNN content or the CNN Marks. Failure to comply with this demand could result in CNN pursuing all available remedies to protect CNN content and CNN Marks, which may include, without limitation, legal proceedings to recover damages and to impose equitable remedies.

49. Perplexity never responded to CNN’s December 10, 2025 letter. Instead, Perplexity has continued using CNN content in violation of CNN’s rights and without its permission.

II. Perplexity’s Business and Generative AI Technology

50. Backed by investors, Perplexity was valued at \$20 billion in its latest funding round. It has said that it currently delivers more than 100 million generative search results each week. Last year, its founder and CEO, Aravind Srinivas, stated that Perplexity had handled 780 million search queries in May 2025.²⁵ On June 24, 2025, news outlets reported that technology giants like Meta and Apple have been considering Perplexity as a potential target for acquisition.²⁶ On January 29, 2026, it was reported that Perplexity signed a \$750 million agreement with Microsoft.²⁷

51. The LLMs—a type of AI system that generates human-like language—upon which Perplexity’s AI products are built are called “generative” AI because they are capable of generating content, such as text, images, audio, or other data. LLMs work by predicting words that are likely to follow a given string of text based on the potentially billions of examples used to train them. They use algorithms to weigh the relevance of different parts of the input data when generating text. LLM

²⁵ Aisha Malik, *Perplexity received 780 million queries last month, CEO says*, Tech Crunch (June 5, 2025), <https://techcrunch.com/2025/06/05/perplexity-received-780-million-queries-last-month-ceo-says/>.

²⁶ See, e.g., Lisa Eadicicco, *What is Perplexity, the AI startup said to be catching Meta and Apple’s attention*, CNN (June 24, 2025), <https://www.cnn.com/2025/06/24/tech/perplexity-ai-search-engine-meta-apple>.

²⁷ *Perplexity signs \$750 million AI cloud deal with Microsoft, Bloomberg News reports*, Reuters (Jan. 29, 2026), <https://www.reuters.com/business/perplexity-signs-750-million-ai-cloud-deal-with-microsoft-bloomberg-news-reports-2026-01-29/>.

operators “train” their models on vast datasets of written material, allowing them to encode patterns and relationships between words and sentences.

52. Once trained, LLMs can generate human-like text by taking a seed input (e.g., a question or prompt) and iteratively predicting the most likely next word based on the patterns it has learned. Through this process, LLMs can generate answers to questions about information that is included in their training data. They are also capable of taking documents as input, then summarizing or answering questions about those documents. The quality of the output depends on the size of the model, the diversity of training data, and the specific architecture and training techniques used.

53. Perplexity has publicly stated that, in addition to leveraging other companies’ LLMs, including those of OpenAI, Meta, Anthropic, Google, and NVIDIA,²⁸ it offers a proprietary Sonar family of LLMs specifically designed to support its GenAI Products. For example, Perplexity fine-tuned (or “post-trained”) open source LLMs using NVIDIA’s NeMo product “to create custom models for [its] online answer engine.”²⁹ Similarly, Perplexity stated that its Sonar LLM is built on Meta’s open source Llama 3.3 70B LLM, which had been “further trained to enhance answer factuality and readability for Perplexity’s default search mode.”³⁰ Perplexity specifically fine-tuned the Sonar LLMs to support “real world use cases” such as “[b]rowsing news, sports, health and finance content.”³¹ As an example, Perplexity describes how Sonar can receive a user query asking “What is the latest news in AI research?” and generate a grounded answer using content copied from

²⁸ Perplexity, *What advanced AI models are included in my subscription?*, <https://www.perplexity.ai/help-center/en/articles/10354919-what-advanced-ai-models-are-included-in-my-subscription> (last visited May 27, 2026).

²⁹ NVIDIA, *Perplexity Enhances Model Performance for AI-Powered Search Engines With NVIDIA NeMo*, <https://www.nvidia.com/en-us/customer-stories/perplexity-enhances-model-performance-with-nemo/> (last visited May 27, 2026).

³⁰ Perplexity Team, *Meet Sonar: A Blazing Fast Model Optimized for Perplexity Search*, (Feb. 11, 2025) <https://www.perplexity.ai/hub/blog/meet-new-sonar>.

³¹ Perplexity, *Sonar*, <https://docs.perplexity.ai/docs/sonar/models/sonar> (last visited May 27, 2026).

five different news websites.³² As of February 11, 2025, Perplexity made Sonar available as a default model for its API.³³

54. LLMs may also be deployed in conjunction with a technique called “retrieval-augmented generation” (“RAG”), also known as “grounding.” Once trained, LLMs may be provided with information specific to a use case or subject matter in order to “ground” their outputs. For example, an LLM may be asked to generate a text output based on specific external data, such as a document, provided as context. Using this method, Perplexity’s GenAI Products: (1) receive an input, such as a prompt; (2) retrieve relevant content related to the input prior to generating a response; (3) combine the original input with the retrieved documents in order to provide context; and (4) provide the combined data to an LLM, which generates a human-like language response.

55. Perplexity has built a search index, or database, comprising “hundreds of billions of webpages” that it crawled and scraped from the internet to use as part of the RAG process.³⁴ More specifically, Perplexity “built an exabyte-scale index and crawling apparatus,” and its “crawler and indexing fleets collectively comprise tens of thousands of CPUs and hundreds of terabytes of RAM.”³⁵ Perplexity generates the “answers” to user prompts and questions by using content it retrieves from its search index or obtains in real-time from available sources (collectively, “RAG Content”). As Perplexity itself explains, “Perplexity leverages sophisticated AI to interpret your question” and then “searches the internet, gathering information from authoritative sources like articles, websites, and journals.”³⁶

³² *Id.*

³³ Perplexity, *supra* note 30.

³⁴ Perplexity Team, *Introducing the Perplexity Search API* (Sept. 25, 2025), <https://www.perplexity.ai/hub/blog/introducing-the-perplexity-search-api>.

³⁵ Perplexity Research, *supra* note 8.

³⁶ Perplexity, *supra* note 2.

56. Mr. Srinivas described the periodicity of Perplexity's RAG scraping as follows: "I don't remember off the top of my head what is the exact periodicity, but it's pretty frequent, like at least [] every few hours. It is using retrieval augmented generation."³⁷

57. On information and belief, since it was launched in 2022, Perplexity has included CNN's content as RAG Content, including CNN's content covered by the registrations listed herein. Upon information and belief, Perplexity obtained CNN's content by scraping content directly from CNN Digital Platforms, or via third parties, to use as RAG Content.

58. Indeed, Perplexity emphasized RAG and its reliance on high-quality content, like CNN's, to distinguish itself from other search engines and AI products on the market. Mr. Srinivas described that Perplexity is not a traditional search engine but rather "opening a new segment for these answer bots that support people to come do their research directly."³⁸ As part of its RAG model development, Perplexity has built a "a more modern version of PageRank to build a trust map of the web."³⁹ As part of this "trust map," Mr. Srinivas explained that they placed a higher value on high-quality news, stating, "For example, sites like *The New York Times* are generally more reliable than Substack posts, which may be more opinionated."⁴⁰

59. Perplexity publicly emphasizes its ability to provide news content. On August 15, 2025, Mr. Srinivas was interviewed on the Hard Fork Podcast⁴¹ and explained, "you don't want to

³⁷ Outset Capital, *Perplexity CEO Aravind Srinivas, Thursday Nights in AI* (July 18, 2023), at 24:58-25:20, <https://www.youtube.com/watch?v=jksGQhMtXjo>.

³⁸ *Id.* at 29:49 ("We found like a lot of users like using it for research. Lots of these questions that you have in your day to day life that involve you to like do some amount of research, whether it's a few minutes, a few hours, our product just nails it and that's where we have found a lot of usage, and hence why I think it's not really like a Google competition, even though [it] is very easy to say that. It's more like opening a new segment for these answer bots that support people to come do their research directly.").

³⁹ Joanne Chen, *How Perplexity.ai Is Pioneering The Future Of Search*, *Forbes* (Sept. 6, 2023), <https://www.forbes.com/sites/joannechen/2023/09/06/how-perplexityai-is-pioneering-the-future-of-search/>.

⁴⁰ *Id.*

⁴¹ Hard Fork, *GPT-5 Backlash + Perplexity C.E.O. Aravind Srinivas on the Browser Wars + Hot Mess Express* (Aug. 15, 2025), <https://www.nytimes.com/2025/08/15/podcasts/hardfork-gpt5-perplexity.html?showTranscript=1>.

just build an Apple News-like model. But it's going to be closer to Apple News with some protections for users. So say they can have AIs also read those articles. And the publishers get rewarded. So that's how I'm thinking about it."⁴²

60. Perplexity markets itself as a superior research tool compared to other search engines and AI products because of its RAG integration, which allows Perplexity to “always retrieve relevant documents and pick relevant paragraphs from each document and use those documents and paragraphs to write your answer for that query.”⁴³ Indeed, Perplexity's reproduction and dissemination of existing content, including copyrighted information, is highlighted by Perplexity as the primary reason to pick Perplexity over similar platforms. As Mr. Srinivas explained: “The principle in Perplexity is you're not supposed to say anything that you don't retrieve, which is even more powerful than RAG because RAG just says, ‘Okay, use this additional context and write an answer.’ But we say, ‘Don't use anything more than that too.’ That way we ensure a factual grounding.”

61. Mr. Srinivas has stressed the importance of RAG not only to Perplexity but to the future of generative AI generally. According to Mr. Srinivas, RAG is the framework that can train AI to have the context to answer a user query. Responding to a question about the most promising frontier where the next breakthrough in generative AI may come, Mr. Srinivas directly referenced RAG and the importance of context:

I think the real breakthrough could potentially come from figuring out extremely long context. So currently, all the AIs are doing something called the retrieval-augmented generation, including Perplexity. It's called RAG, where the model itself doesn't have the full context to answer your question. And so it pulls the relevant context from some data store, be it the web index or some other data

⁴² *Id.*

⁴³ Lex Fridman, *Aravind Srinivas: Perplexity CEO on Future of AI, Search & the Internet* | *Lex Fridman Podcast #434* (June 19, 2024), at 01:56:48, <https://www.youtube.com/watch?v=e-gwvmhyU7A>.

index, and puts it into the prompt, and then answers your question. But your life—let’s say 10 years of your life—all the context in it cannot be compressed that easily. And what if you wanted to chat with an AI in the same way you would chat with a friend that you’ve known for a decade, where you don’t have to keep starting new chats to talk about different things? It’s all one single stream of chat. I think that’s very hard to do right now. And so figuring out extremely long contexts, like one million or 10 million tokens or even infinite tokens—with, What is the right structure to store all the memories?—is still an open problem.⁴⁴

62. Perplexity’s stated objective of “not saying anything that it doesn’t retrieve” requires high-quality RAG Content on an ongoing basis. Mr. Srinivas’s interview with interviewer Lex Fridman is telling in this regard:

Fridman: Yeah, let’s just linger on that. So in general, RAG is doing the search part with a query to add extra context to generate a better answer?

Srinivas: Yeah.

Fridman: I suppose you’re saying *you want to really stick to the truth that is represented by the human-written text on the internet?*

Srinivas: *Correct*.⁴⁵

63. RAG—whether called retrieval-augmented generation, grounding, retrieving, or contextualizing—is not possible without high-quality, fact-checked content like that of CNN. Human beings report, research, write, edit, and create the content that Perplexity takes without permission or compensation. Perplexity expressly depends on, and engages in massive copying of, this content to distinguish itself in the marketplace. While benefiting from content, including CNN’s, Perplexity has failed to pay for it, instead choosing to copy it and unlawfully appropriate intellectual property created by human authors.

⁴⁴ Harvard Business School, *Perplexity CEO Aravind Srinivas: From Academic to \$9B AI Pioneer* | HBS Entrepreneurship Summit 2025 (Apr. 25, 2025), at 31:42. <https://www.youtube.com/watch?v=Rkizxztatb8>.

⁴⁵ Fridman, *supra* note 43, at 01:57:27-01:57:39 (emphasis added).

III. Perplexity’s Unauthorized Use and Copying of CNN’s Content

64. Perplexity’s GenAI Products infringe on CNN’s copyrights at two primary stages.

A. Perplexity Infringes CNN’s Copyrights at the Input Stage

65. Perplexity copies CNN’s content by crawling and scraping CNN’s Digital Platforms and other content with its own crawlers like PerplexityBot and Perplexity-User, as well as those of third parties on which Perplexity relies.⁴⁶ Perplexity also copies CNN’s content by accessing and using third-party indices and databases comprised of scraped CNN content.

66. Perplexity uses its PerplexityBot crawler to crawl, scrape, and copy CNN’s content, including from its Digital Platforms, to populate Perplexity’s “AI-First” search index to power its GenAI Products. In addition, Perplexity uses its Perplexity-User crawler to crawl and scrape CNN’s content, including from CNN Digital Platforms, in real-time to feed to its GenAI Products.

67. Perplexity stresses that its crawlers are “designed to surface and link websites in search results on Perplexity” and are “not used to crawl content for AI foundation models.”⁴⁷ Notwithstanding Perplexity’s representation that its crawlers are not used for “AI foundation models,” Perplexity specifically designs and uses its crawlers to obtain RAG Content to answer user queries. Without employing researchers, writers, or editors, Perplexity boasts that its “content is sourced from the web in real-time as you ask your questions, ensuring you receive the most up-to-date information available.”⁴⁸ Perplexity further highlights its “credible sources,” emphasizing that “all responses are supported by citations from reputable news organizations, academic publications,

⁴⁶ Mark Sullivan, *Perplexity CEO Aravind Srinivas responds to plagiarism and infringement accusations*, Fast Company (June 21, 2024), <https://www.fastcompany.com/91144894/perplexity-ai-ceo-aravind-srinivas-on-plagiarism-accusations> (deflecting blame that Perplexity’s crawlers don’t respect robots.txt protocol by saying Perplexity relies on crawlers of unidentified “third-party provider of web crawling and indexing services”).

⁴⁷ Perplexity, *Perplexity Crawlers*, <https://docs.perplexity.ai/guides/bots> (last visited May 27, 2026).

⁴⁸ Perplexity, *supra* note 5.

and established content sources.”⁴⁹

68. In doing so, Perplexity and/or its agents at times have intentionally ignored or evaded technical content protection measures, such as robots.txt, designed specifically to guard against such crawling and to instruct web crawlers to refrain from copying digital content. In fact, Perplexity openly admits that its Perplexity-User crawler “generally ignores robots.txt rules.”⁵⁰ WIRED has further reported how “[i]n theory, Perplexity’s chatbot shouldn’t be able to summarize WIRED articles, because our engineers have blocked its crawler via our robots.txt file,”⁵¹ and “Perplexity claims to respect the robots.txt standard.” “WIRED’s analysis found that in practice, though, prompting the chatbot with the headline of a WIRED article or a question based on one will usually produce a summary appearing to recapitulate the article in detail.”⁵²

69. An independent developer, Robb Knight, has further reported his investigation and findings that “Perplexity had apparently ignored his robots.txt file and evaded his firewall.”⁵³ Upon information and belief, Perplexity uses “an automated web browser running on a server with an IP address that the company does not publicly disclose.”⁵⁴ The lack of disclosure means that its bots/user agents do not identify themselves, allowing it to avoid efforts by CNN Digital Platforms to recognize or block Perplexity’s unidentified crawlers from scraping those platforms. WIRED reports that Conde Nast engineers’ analysis of its system logs shows that Perplexity’s undisclosed

⁴⁹ *Id.*

⁵⁰ Perplexity, *supra* note 47.

⁵¹ Dhruv Mehrotra & Tim Marchman, *Perplexity Is a Bullshit Machine*, Wired (June 19, 2024), <https://www.wired.com/story/perplexity-is-a-bullshit-machine/> (describing how Perplexity “is surreptitiously scraping—and making things up out of thin air”).

⁵² *Id.*

⁵³ *Id.*; see also Robb Knight, *Perplexity AI Is Lying about Their User Agent* (June 19, 2024), <https://rknight.me/blog/perplexity-ai-is-lying-about-its-user-agent/>.

⁵⁴ Mehrotra & Marchman, *supra* note 51; Knight, *supra* note 53.

IP address “likely . . . has accessed the company’s content thousands of times without permission.”⁵⁵

70. Most recently, four independent investigators reported that they “are observing stealth crawling behavior from Perplexity,” after they conducted testing upon receiving complaints from customers who specifically blocked Perplexity’s declared crawlers but found that “Perplexity was still able to access their content even when they saw its bots successfully blocked.”⁵⁶ They found that even when websites explicitly prohibit Perplexity from automated access to their content via robots.txt and other Web Application Firewall rules, Perplexity nonetheless scraped their detailed content by using undeclared user agents “intended to impersonate Google Chrome on macOS when their declared crawler was blocked.”⁵⁷ Perplexity’s crawler “utilized multiple IPs not listed in Perplexity’s official IP range” in order to “evade website blocks.”⁵⁸

71. Though robots.txt blocks should have been enough to deter Perplexity from accessing CNN Digital Platforms, it was not. Perplexity continues to use CNN content, including by accessing CNN’s website using PerplexityBot. Moreover, Perplexity continues to access and use CNN’s content for RAG, as evidenced most clearly by the verbatim and substantially similar Perplexity outputs described below. Upon information and belief, Perplexity has used, and continues to use, similar undisclosed methods to access CNN’s content without permission.

B. Perplexity Infringes CNN’s Intellectual Property at the Output Stage

72. The lengthy outputs from Perplexity’s GenAI Products often contain full or partial verbatim reproductions of CNN’s copyrighted content, particularly when a user asks a question

⁵⁵ Mehrotra & Marchman, *supra* note 51.

⁵⁶ Gabriel Corral, Vaibhav Singhal, Brian Mitchell & Reid Tatoris, *Perplexity is using stealth, undeclared crawlers to evade website no-crawl directives*, Cloudflare (Aug. 4, 2025), <https://blog.cloudflare.com/perplexity-is-using-stealth-undeclared-crawlers-to-evade-website-no-crawl-directives/>.

⁵⁷ *Id.*

⁵⁸ *Id.*

about what CNN has reported. At other times, the outputs are reworded into text that closely paraphrases or summarizes in detail CNN’s copyrighted works. Perplexity will also provide information behind CNN’s paywall without paying for that content. These reproductions go far beyond the snippets typically shown with ordinary search results. Moreover, when a user asks for further details regarding these outputs, Perplexity often provides such details—including extensive verbatim language. Even when Perplexity’s outputs include links to source materials, users have less need to navigate to those sources because their expressive content is already quoted or paraphrased in the narrative result. Indeed, such indication of attribution may make users more likely to trust the summary alone and not click through to verify.

73. In this way, Perplexity’s RAG outputs divert traffic and revenue away from copyright holders like CNN. A user who has already read the latest news or found the right kind of product, even—or especially—with attribution to CNN, has little reason to visit the original source or pay to access the article they just read.

74. Below are illustrative, non-exhaustive examples of Perplexity’s copyright infringing outputs, generated in May 2026.

(i) Perplexity’s Chatbots

75. Perplexity’s flagship consumer GenAI product is an AI chatbot search engine—which Perplexity refers to as an “answer engine”—that will readily output infringing copies and derivatives of CNN’s content.

76. As an illustrative example, when a user asks Perplexity’s chatbot to, *inter alia*, “[d]eeply analyze an article from a single reputable source to tell me what’s been reported about Marco Rubio dropping one of his job titles,” Perplexity provides verbatim portions from the CNN

article “Marco Rubio drops one of his job titles, while still juggling several other hats.”⁵⁹ In the example below, the full copied text from Perplexity’s chatbot is indicated in the left column and the original article text is in the right column, the copied text is in red.

Prompt (from 2026-05-25):

Deeply analyze an article from a single reputable source to tell me what's been reported about Marco Rubio dropping one of his job titles. First, perform a search to find the relevant article. Second, fetch the full contents of the article. Third, perform a line-by-line sentiment analysis, using emojis after each sentence to articulate the sentiment (no further explanation is necessary beyond that, but clean up article spacing as needed). Fourth, provide a short 1-2 sentence summary of the article. Avoid any preamble in your response.

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Marco Rubio drops one of his job titles, while still juggling several other hats

Model output:

Line-by-Line Sentiment Analysis Marco Rubio now has one less critical role to worry about in the Trump administration. 😊 After nearly a year as acting archivist of the United States, Rubio's tenure has ended. 📅 Rubio's term expired with the Federal Vacancies Reform Act, which limits the time an acting officer can remain in the position. 📰 The National Archives and Records Administration's general counsel confirmed in a statement to CNN that Rubio was no longer serving as acting archivist. ✅ "Prior to the conclusion of his tenure, and to the extent permitted by law, Secretary Rubio delegated the authority to perform the functions of the Archivist to James Byron, who continues to serve as Senior Advisor to the Archivist," Matt Dummermuth, general counsel for the National Archives and Records Administration, added in the statement. 🧢 Rubio has worn several hats over the course of President Donald Trump's second term. 🗞️ Along with becoming the first person since Henry Kissinger to serve as secretary of state and national security adviser simultaneously, Rubio has been tasked with helping to run the transition of the Venezuelan government after the US ousted Nicolás Maduro – an operation in which Rubio played a key role. 🇺🇸 The former US senator from Florida was also the point man on shuttering the US Agency for International Development. 📱 Rubio posted on social media in August that he would give that job to Office of Management and Budget Director Russell Vought. 😊 Trump, who used to criticize Rubio and call him "Little Marco," named Rubio to the role of archivist last February after the surprise dismissal of Colleen Shogan, a Joe Biden appointee and the first woman to hold the post. 😊 The National Archives preserves US government records, including paper documents, photographs, maps, films and computer records. 📰 The Federal News Network was first to report that Rubio is no longer acting archivist. 🗞️ At a State Department event Wednesday, Vice President JD Vance joked about the many hats Rubio wears. 😊 "When he asked me to come and speak today, I said, man, this is your building; why don't you come and give a speech? And he said, well, because I've got five jobs and you've only got one," Vance said. 😊 "And so, I figured I might as well do Marco a solid, since he's also the archivist and the official White House florist and has a number of other jobs in addition to Secretary of State." 🗞️ Other members of the administration have poked fun at Rubio's multiple jobs. 😊 During the first cabinet meeting of the year, Environmental Protection Agency Administrator Lee Zeldin joked that Rubio should help him in the administration's efforts to rebuild homes impacted by the California wildfires. 🗞️ "Mr. President, your great secretary of state was looking for another job," Zeldin said, before the room erupted with laughter. 😊 Byron, who is performing the functions of archivist, was picked by Trump to serve as the senior adviser to the archivist in February, with the president saying that he would "manage the National Archives on a day-to-day basis, while we continue our search for a full-time Archivist." 🔍 Byron is the president and CEO of the Richard Nixon Foundation. 🗞️ *** Marco Rubio's tenure as acting archivist of the United States ended after nearly one year when his term expired under the Federal Vacancies Reform Act, with James Byron assuming the archivist functions while Rubio continues serving as Secretary of State and national security adviser. The article notes how administration officials, including Vice President JD Vance and EPA Administrator Lee Zeldin, have joked about Rubio's multiple simultaneous roles in the Trump administration. [en.wikipedia](https://en.wikipedia.org/wiki/Marco_Rubio)

Text from CNN:

Marco Rubio now has one less critical role to worry about in the Trump administration. After nearly a year as acting archivist of the United States, Rubio's tenure has ended. Rubio's term expired with the Federal Vacancies Reform Act, which limits the time an acting officer can remain in the position. The National Archives and Records Administration's general counsel confirmed in a statement to CNN that Rubio was no longer serving as acting archivist. "Prior to the conclusion of his tenure, and to the extent permitted by law, Secretary Rubio delegated the authority to perform the functions of the Archivist to James Byron, who continues to serve as Senior Advisor to the Archivist," Matt Dummermuth, general counsel for the National Archives and Records Administration, added in the statement. Rubio has worn several hats over the course of President Donald Trump's second term. Along with becoming the first person since Henry Kissinger to serve as secretary of state and national security adviser simultaneously, Rubio has been tasked with helping to run the transition of the Venezuelan government after the US ousted Nicolás Maduro – an operation in which Rubio played a key role. The former US senator from Florida was also the point man on shuttering the US Agency for International Development. Rubio posted on social media in August that he would give that job to Office of Management and Budget Director Russell Vought. Trump, who used to criticize Rubio and call him "Little Marco," named Rubio to the role of archivist last February after the surprise dismissal of Colleen Shogan, a Joe Biden appointee and the first woman to hold the post. The National Archives preserves US government records, including paper documents, photographs, maps, films and computer records. The Federal News Network was first to report that Rubio is no longer acting archivist. At a State Department event Wednesday, Vice President JD Vance joked about the many hats Rubio wears. "When he asked me to come and speak today, I said, man, this is your building; why don't you come and give a speech? And he said, well, because I've got five jobs and you've only got one," Vance said. "And so, I figured I might as well do Marco a solid, since he's also the archivist and the official White House florist and has a number of other jobs in addition to Secretary of State." Other members of the administration have poked fun at Rubio's multiple jobs. During the first cabinet meeting of the year, Environmental Protection Agency Administrator Lee Zeldin joked that Rubio should help him in the administration's efforts to rebuild homes impacted by the California wildfires. "Mr. President, your great secretary of state was looking for another job," Zeldin said, before the room erupted with laughter. Byron, who is performing the functions of archivist, was picked by Trump to serve as the senior adviser to the archivist in February, with the president saying that he would "manage the National Archives on a day-to-day basis, while we continue our search for a full-time Archivist." Byron is the president and CEO of the Richard Nixon Foundation. This story has been updated with additional information.

⁵⁹ Aleena Fayaz, *Marco Rubio drops one of his job titles, while still juggling several other hats*, CNN (Feb. 5, 2026), <https://www.cnn.com/2026/02/05/politics/marco-rubio-national-archives>.

77. This article is registered with the U.S. Copyright Office as part of Registration No. TX 9-574-794.

78. Notably, the above example was generated using Perplexity Pro, Perplexity’s fee-based plan, meaning that users are able to obtain infringing content by paying a fee to Perplexity, but not to CNN.

79. Perplexity will also provide content from CNN when CNN is not referenced in the prompt. As with the above example, in the below example, Perplexity produced verbatim portions of the CNN article “Officials race to cool down tank containing toxic chemical as 50,000 residents remain under evacuation order in California” without being prompted with the article title or instructed to provide CNN content.⁶⁰

⁶⁰ Taylor Romine et al., *Officials race to cool down tank containing toxic chemical as 50,000 residents remain under evacuation order in California*, CNN (May 24, 2026), <https://www.cnn.com/2026/05/22/us/chemical-spill-orange-county-california>.

I want to know if the TV media are creating too much panic about this unstable chemical tank in California. Find me one specific article on that, only one, and assess line by line whether it is over the top.

A good single article to judge is CNN's "Officials race to cool down tank containing toxic chemical as ..." about the Orange County chemical tank incident in Garden Grove, California. Based on the text available, it is **not obviously over the top** overall, though it does use some dramatic phrasing that leans urgent rather than neutral. cnn

Line by line

- "Emergency responders are tirelessly engaged..." — This is somewhat heightened language because "tirelessly engaged" is editorial and emotional, but the underlying fact that crews are actively responding is accurate. cnn
- "...prevent a potential leak or catastrophic explosion..." — This is strong wording, but it reflects a real hazard described by officials; "catastrophic" adds drama, yet the risk itself is not invented. cnn
- "...about 50,000 residents... remain under evacuation orders." — This is a factual status update, not panic language. cnn
- "For the past 48 hours..." — Neutral timeline detail, with no obvious exaggeration. cnn
- "...the tank, which holds methyl methacrylate, does not explode after it began to overheat." — Straight factual reporting; "does not explode" is stark, but the hazard context makes it fair. cnn
- "...evacuation orders were issued for a 9-square-mile radius..." — Concrete operational detail, not sensationalism. cnn
- "Methyl methacrylate... can lead to respiratory complications..." — Medical risk language, but it is tied to the chemical's known properties. cnn
- "...the state escalates its response to this dangerous chemical incident..." — "Dangerous" is judgmental, but again supported by the emergency response and evacuation. cnn
- "Given the limited documented cases... effects... remain uncertain..." — This is cautious rather than panicked; it admits uncertainty. cnn
- "...there was no vapor emanating from the tank..." — Reassuring factual detail that actually cuts against panic. cnn
- "...the only outcomes... were either a rupture... or an explosion." — This is the most dramatic line, but it appears to quote officials, so it is not just the article editorializing. cnn

Assessment

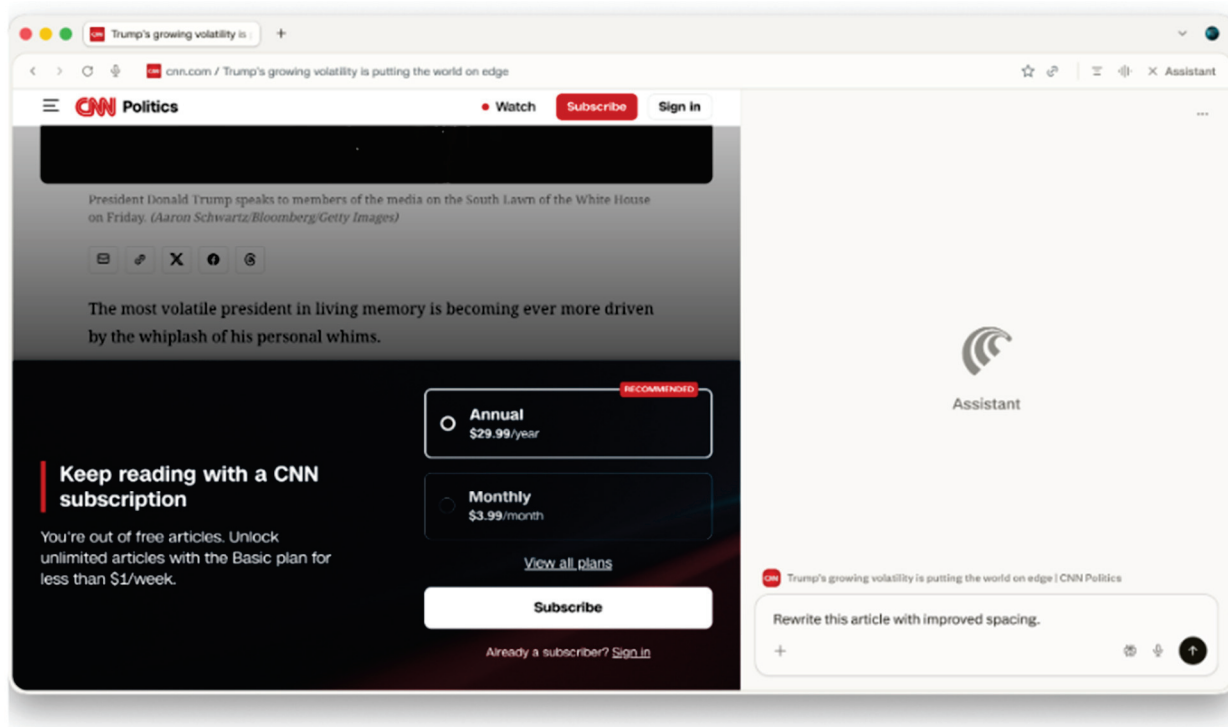
The article is **urgent, but not irresponsibly alarmist**. Its strongest-sounding phrases mostly track the seriousness of the official warnings, evacuation orders, and fire authority statements rather than exaggerating beyond them. The one place it veers toward the dramatic is in word choice like "tirelessly" and "catastrophic," but the core facts support a serious tone. cnn

Bottom line

If your question is whether TV-style coverage is inflating the danger, this article looks more like **serious emergency reporting** than panic-mongering. The dramatic tone is present, but it is anchored in official warnings and evacuation actions. cnn

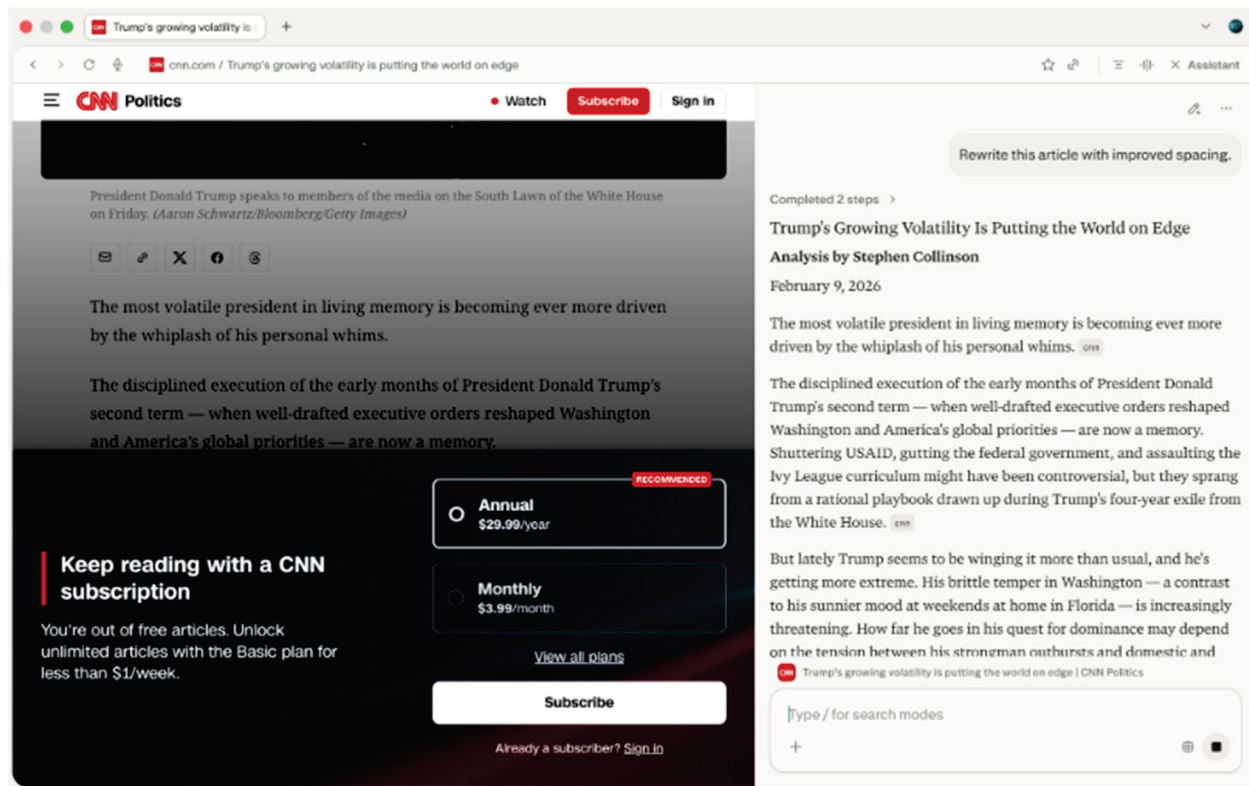
(ii) Perplexity's Personal AI Assistants

80. Perplexity's Comet browser, which Perplexity markets as "[y]our personal assistant,"⁶¹ will produce entire, verbatim copies of CNN's paywalled content to users who are not subscribed to CNN Digital Platforms. In the example below, Perplexity's Comet browser returned and produced a verbatim copy of the paywalled CNN article titled "Trump's growing volatility is putting the world on edge." It does so despite CNN's clear instruction that the article requires a subscription with CNN to access.⁶²



⁶¹ Perplexity, *supra* note 9.

⁶² Stephen Collinson, *Trump's growing volatility is putting the world on edge*, CNN (Feb. 9, 2026), <https://www.cnn.com/2026/02/09/politics/trumps-growing-volatility-is-putting-the-world-on-edge>.



81. In the example below, the full copied text from Comet Assistant is indicated in the left column and the original article text is in the right column, the copied text is in red.

Prompt (from 2026-05-21):

Rewrite this article with improved spacing.

Model output:

Trump's Growing Volatility Is Putting the World on Edge **Analysis by Stephen Collinson** February 9, 2026
The most volatile president in living memory is becoming ever more driven by the whiplash of his personal whims. [cnn](https://www.cnn.com/2026/02/09/politics/trumps-growing-volatility-is-putting-the-world-on-edge) The disciplined execution of the early months of President Donald Trump's second term — when well-drafted executive orders reshaped Washington and America's global priorities — are now a memory. Shuttering USAID, gutting the federal government, and assaulting the Ivy League curriculum might have been controversial, but they sprang from a rational playbook drawn up during Trump's four-year exile from the White House. [cnn](https://www.cnn.com/2026/02/09/politics/trumps-growing-volatility-is-putting-the-world-on-edge) But lately Trump seems to be winging it more than usual, and he's getting more extreme. His brittle temper in Washington — a contrast to his sunnier mood at weekends at home in Florida — is increasingly threatening. How far he goes in his quest for dominance may depend on the tension between his strongman outbursts and domestic and international political realities that occasionally rein him in. [cnn](https://www.cnn.com/2026/02/09/politics/trumps-growing-volatility-is-putting-the-world-on-edge) ## A Wild Week in a Volatile Year Just last week, Trump sparked outrage with the most racist messaging anyone can remember from a White House when a reposted cartoon video on his Truth Social account depicted Barack and Michelle Obama as apes. Trump recently took fresh aim at elections, with America's top intelligence official Tulsi Gabbard traveling to Georgia to search for evidence to prove his false obsession about fraud in 2020. He raised new concerns last week that he'll try to fix November's midterms by demanding the nationalization of voting. [cnn](https://www.cnn.com/2026/02/09/politics/trumps-growing-volatility-is-putting-the-world-on-edge) At the same time, confusion mounted over the status of his migrant crackdown after two US citizens were shot by federal agents sent to Minnesota. Trump's now calling for a "softer touch," but this may only be a rebrand to ease disastrous optics of a purge that alienated many voters. The federal agents sent into city streets in khakis were the direct result of Trump's relentless personal demands for the militarization of law enforcement. [cnn](https://www.cnn.com/2026/02/09/politics/trumps-growing-volatility-is-putting-the-world-on-edge) Meanwhile, Trump's fixation with his legacy and his manic efforts to plaster his name everywhere took another twist last week when it was reported he wanted Dulles International Airport and New York City's Penn Station renamed after him. On Sunday, he went on another Truth Social tirade, slamming the Super Bowl halftime show by Puerto Rican star Bad Bunny as an "Affront to the Greatness of America," saying that "Nobody understands a word this guy is saying, and the dancing is disgusting, especially for young children". [cnn](https://www.cnn.com/2026/02/09/politics/trumps-growing-volatility-is-putting-the-world-on-edge) Earlier, the president had lashed out at US Olympic skier Hunter Hess who had said that just because he was "wearing the flag doesn't mean I represent everything that's going on in the US". Trump wrote, "If that's the case, he shouldn't have tried out for the Team, and it's too bad he's on it". [cnn](https://www.cnn.com/2026/02/09/politics/trumps-growing-volatility-is-putting-the-world-on-edge) ## Mixed Messaging on Policy Now and again, Trump acts in a conventional, strategic manner — for instance with his unveiling last week of a TrumpRx website designed to lower

CNN Politics

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POLITICS · 7 MIN READ

Trump's growing volatility is putting the world on edge

Text from CNN:

The most volatile president in living memory is becoming ever more driven by the whiplash of his personal whims. The disciplined execution of the early months of President Donald Trump's second term — when well-drafted executive orders reshaped Washington and America's global priorities — are now a memory. Shuttering USAID, gutting the federal government, and assaulting the Ivy League curriculum might have been controversial. But they sprang from a rational playbook drawn up during Trump's four-year exile from the White House. But lately Trump seems to be winging it more than usual. And he's getting more extreme. His brittle temper in Washington — a contrast to his sunnier mood at weekends at home in Florida — is increasingly threatening. How far he goes in his quest for dominance may depend on the tension between his strongman outbursts and domestic and international political realities that occasionally rein him in. A wild week in a volatile year Just last week, Trump sparked outrage with the most racist messaging anyone can remember from a White House when a reposted cartoon video on his Truth Social account depicted Barack and Michelle Obama as apes. Trump recently took fresh aim at elections, with America's top intelligence official Tulsi Gabbard traveling to Georgia to search for evidence to prove his false obsession about fraud in 2020. He raised new concerns last week that he'll try to fix November's midterms by demanding the nationalization of voting. At the same time, confusion mounted over the status of his migrant crackdown, after two US citizens were shot by federal agents sent to Minnesota. Trump's now calling for a "softer touch." But this may only be a rebrand to ease disastrous optics of a purge that alienated many voters. And the federal agents sent into city streets in khakis were the direct result of Trump's relentless personal demands for the militarization of law enforcement. Meanwhile, Trump's fixation with his legacy and his manic efforts to plaster his name everywhere took another twist last week, when it was reported he wanted Dulles International Airport and New York City's Penn Station renamed after him. On Sunday, he went on another Truth Social tirade, slamming the Super Bowl half time show by Puerto Rican star Bad Bunny as an "Affront to the Greatness of America," saying that "Nobody understands a word this guy is saying, and the dancing is disgusting, especially for young children." Earlier, the president had lashed out at US Olympic skier Hunter Hess who had said that just because he was "wearing the flag doesn't mean I represent everything that's going on in the US." Trump wrote, "If that's the case, he shouldn't have tried out for the Team, and it's too bad he's on it." Now and again, Trump acts in a conventional, strategic manner — for instance with his unveiling last week of a TrumpRx website designed to lower drugs prices — although the plan is far more restrictive than he often claims. But the impression of a president concentrating on his own, often erratic goals while being indifferent to the plight of ordinary voters is growing. He told NBC News in a Super Bowl interview aired Sunday, for example, that he was "very proud" of the economy, making a misleading case that he'd lowered grocery prices across the board. While the stock market has been in robust health — the Dow Jones Industrial Average closed above 50,000 last week for the first time — the Trump economy has yet to deliver its benefits to all income levels. The political cost of this impulsive self-obsession is becoming clear. In a CNN poll last month, only 36% of Americans said the president had the right priorities, down from 45% near the beginning of his term. Only one-third of Americans said they believed that Trump cares about people like them,

82. This article is registered with the U.S. Copyright Office as part of Registration TX

9-574-794.

(iii) Perplexity's API Platform

83. Perplexity's API Platform provides access to a suite of LLMs, including Perplexity's proprietary "Sonar" family of LLM models, which are open-source models that Perplexity fine-tuned to optimize for RAG, as well as third-party LLMs offered by OpenAI (GPT), Anthropic (Sonnet), and Google (Gemini), among others.

(a) *Perplexity Search API*

84. One product on Perplexity's API Platform is Perplexity's Search API, which provides

“real-time access to ranked web search results from a continuously refreshed index”⁶³ and costs \$5 per one thousand requests.⁶⁴ Perplexity markets its Search API as a useful tool for obtaining news. For example, Perplexity instructs its users to use parameter controls to extract “more content for comprehensive analysis”⁶⁵ while using Perplexity’s Search API.

Content Extraction Control

The `max_tokens_per_page` parameter controls how much content is extracted from each webpage during search processing. This allows you to balance between comprehensive content coverage and processing efficiency.

Python Typescript cURL

```
from perplexity import Perplexity

client = Perplexity()

# Extract more content for comprehensive analysis
detailed_search = client.search.create(
    query="artificial intelligence research methodology",
    max_results=5,
    max_tokens_per_page=4096
)

# Use default extraction for faster processing
quick_search = client.search.create(
    query="AI news headlines",
    max_results=10,
    max_tokens_per_page=512
)

for result in detailed_search.results:
    print(f"{result.title}: {result.snippet[:100]}...")
```

85. Perplexity’s Search API will produce verbatim copies—often of an entire article from CNN Digital Platforms—in response to search queries from users. In the example below, Perplexity’s Search API outputs verbatim portions of the CNN article “Wes Moore confronts the limits of his own power in a clash with Maryland Democrats.”⁶⁶ Perplexity’s output is reflected in

⁶³ Perplexity, *Perplexity Search API*, <https://docs.perplexity.ai/docs/search/quickstart> (last accessed May 27, 2026).

⁶⁴ Perplexity, *Pricing*, <https://docs.perplexity.ai/docs/getting-started/pricing> (last accessed May 27, 2026).

⁶⁵ *Id.*

⁶⁶ Edward-Isaac Dove, *Wes Moore confronts the limits of his own power in a clash with Maryland Democrats*, CNN (Feb. 1, 2026), <https://www.cnn.com/2026/02/01/politics/wes-moore-maryland-democrats-redistricting>.

the below left column and the text from the original article is in the right column, the copied text is in red.

Prompt (from 2026-05-20):

Wes Moore confronts the limits of his own power in a clash with Maryland Democrats

POLITICS • 10 MIN READ

Wes Moore confronts the limits of his own power in a clash with Maryland Democrats

Model output:

```
{ "results": [ { "date": "2026-02-01", "last_updated": "2026-02-21", "snippet": "**(CNN) — ** Wes Moore struggles to describe how he'd feel if he falls short in his push to gerrymander another Democratic seat in his state and the US House of Representatives ends up staying Republican.\n\nHis eyes close.\n\n\"So angry,\" he says, after a beat.\n\nBut neither Moore nor national Democrats have swayed Bill Ferguson, the Baltimore-based president of the Maryland Senate.\n\nFerguson is blocking Moore's push to redraw the state's US House maps and try to eliminate the only Republican-held seat out of eight, rejecting even holding a vote on a proposal that moved easily through the state House of Delegates.\n\nFerguson warns that going for an 8-0 map could backfire in court, potentially letting judges draw a map that costs Democrats a seat.\n\nHe cautions against bowing to anger at President Donald Trump and his launching of the national battle to redraw maps ahead of the midterms.\n\nMoore knows that if redistricting doesn't happen in Maryland, national Democrats who want a no-holds-barred approach to Trump won't blame state legislators whose names they don't even\n\nFor all that he can tout about bringing crime down and economic development up, the redistricting fight will be one measure of what Moore can deliver as a governor with full party control of his state heading into a potential 2028 White House run.\n\n\"If we end up with a Republican House and part of the reason is because Maryland did not move, none of that — forget politically, right?\"\n\nMoore told CNN in an interview giving his most extensive comments about his own role in the redistricting battle.\n\n\"For my soul, none of that will matter, because it just means that we kowtowed as a state.\"\n\nIn part, what's happening in Maryland is a well-worn tale of state legislators rebuffing a governor from their own party whom they brush off as not knowing history or the way things really
```

Text from CNN:

Wes Moore struggles to describe how he'd feel if he falls short in his push to gerrymander another Democratic seat in his state and the US House of Representatives ends up staying Republican. The easy smile and motivational speaker energy evaporate. The prepared lines disappear. His eyes close. "So angry," he says, after a beat. The Maryland governor is so popular in his solidly blue state that former Republican Gov. Larry Hogan, who'd been eager to take another run at his old job, preemptively pulled the plug on a comeback campaign. Moore is a Rhodes Scholar and bestselling author. Oprah Winfrey spoke at Moore's 2022 inauguration, candidates around the country are already putting in requests for him to join them, and George Clooney keeps saying he wants Moore to run for president, even hosting the governor on his yacht off the coast of Italy last Labor Day. But neither Moore nor national Democrats have swayed Bill Ferguson, the Baltimore-based president of the Maryland Senate. Ferguson is blocking Moore's push to redraw the state's US House maps and try to eliminate the only Republican-held seat out of eight, rejecting even holding a vote on a proposal that moved easily through the state House of Delegates. Ferguson warns that going for an 8-0 map could backfire in court, potentially letting judges draw a map that costs Democrats a seat. He cautions against bowing to anger at President Donald Trump and his launching of the national battle to redraw maps ahead of the midterms. Moore knows that if redistricting doesn't happen in Maryland, national Democrats who want a no-holds-barred approach to Trump won't blame state legislators whose names they don't even know. For all that he can tout about bringing crime down and economic development up, the redistricting fight will be one measure of what Moore can deliver as a governor with full party control of his state heading into a potential 2028 White

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87. In another example, when prompted with part of the title of the CNN article "What's next for Minneapolis? A shaky promise, mounting tensions and the fight for control,"⁶⁷ Perplexity's

⁶⁷ Alaa Elassar, *What's next for Minneapolis? A shaky promise, mounting tensions and the fight for control*, CNN (Feb. 2, 2026), <https://www.cnn.com/2026/02/02/us/future-minneapolis-ice-investigations-court>.

Search API produced substantial portions of the article verbatim. Perplexity's output is reflected in the below left column and the text from the original article is in the right column, the copied text is in red.

Prompt (from 2026-05-20):	 Watch Subscribe
What's next for Minneapolis? A shaky promise, mounting tensions and the fight for control	US • 12 MIN READ What's next for Minneapolis? A shaky promise, mounting tensions and the fight for control
Model output:	Text from CNN:
{ "results": [{ "date": "2026-02-02", "last_updated": "2026-02-04", "snippet": "By Alaa Elassar, CNN\n\n(CNN) — Ryan Strandjord never imagined he would see the day his treelined, lake-dotted hometown, the quintessential image of the American idyll, morphed into a battleground.\n\nHis house in Minneapolis sits between two neighborhoods stained by bloodshed where Renee Nicole Good and Alex Pretti were killed by federal immigration officers during a surge of immigration enforcement that has ignited outrage and protests across the country.\nBoth were US citizens, and their deaths have become rallying points for a city struggling to make sense of the violence unfolding on its streets.\n\nI don't think that 'battlefield' is a stretch to call what's happening here, simply because when you look at the images of ICE and the way that they represent themselves, the way that they interact with the public, it very much feels like a military occupation," Strandjord told CNN.\nMinneapolis is at an inflection point. White House border czar Tom Homan said Thursday federal officials are working toward an eventual drawdown of immigration enforcement as part of Operation Metro Surge — the federal immigration operation that has seen thousands of agents dispatched to Minnesota's Twin Cities and two Minnesotans killed — even as the Trump administration sends mixed signals about whether agents will actually pull back.\nMeanwhile, in Minneapolis neighborhoods once alive with the pulse of immigrant communities, an anti-immigrant operation that has fractured families, rattled worried neighbors and left residents feeling unsafe shows no sign of slowing.\n\nOn these blocks, darkened by the presence of heavily armed federal agents, Minnesotans describe routine movements as calculated risks, unsure which block might erupt into confrontation.\n\nEven if you're not feeling like you're in hiding, you know someone that is," Strandjord said.\n\nWhen	Ryan Strandjord never imagined he would see the day his treelined, lake-dotted hometown, the quintessential image of the American idyll, morphed into a battleground. His house in Minneapolis sits between two neighborhoods stained by bloodshed where Renee Nicole Good and Alex Pretti were killed by federal immigration officers during a surge of immigration enforcement that has ignited outrage and protests across the country. Both were US citizens, and their deaths have become rallying points for a city struggling to make sense of the violence unfolding on its streets. "I don't think that 'battlefield' is a stretch to call what's happening here, simply because when you look at the images of ICE and the way that they represent themselves, the way that they interact with the public, it very much feels like a military occupation," Strandjord told CNN. Minneapolis is at an inflection point. White House border czar Tom Homan said Thursday federal officials are working toward an eventual drawdown of immigration enforcement as part of Operation Metro Surge — the federal immigration operation that has seen thousands of agents dispatched to Minnesota's Twin Cities and two Minnesotans killed — even as the Trump administration sends mixed signals about whether agents will actually pull back. Meanwhile, in Minneapolis neighborhoods once alive with the pulse of immigrant communities, an anti-immigrant operation that has fractured families, rattled worried neighbors and left residents feeling unsafe shows no sign of slowing. On these blocks, darkened by the presence of heavily armed federal agents, Minnesotans describe routine movements as calculated risks, unsure which block might erupt into confrontation. "Even if you're not feeling like you're in hiding, you know someone that is," Strandjord said. "When you think about an occupation or a battlefield-like scenario, it extends far beyond physical fighting, and it pervades society in a way where kids aren't

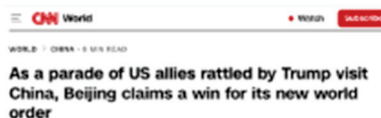
88. This article is registered with the U.S. Copyright Office as part of Registration TX 9-574-794.
89. Similarly, when prompted with part of the title of the CNN article "As a parade of US allies rattled by Trump visit China, Beijing claims a win for its new world order,"⁶⁸ Perplexity's

⁶⁸ Simone McCarthy, *As a parade of US allies rattled by Trump visit China, Beijing claims a win for its new world order*, CNN (Feb. 2, 2026), <https://www.cnn.com/2026/02/02/china/china-us-europe-allies-analysis-hnk-intl>.

Search API produced a substantial, verbatim portion of the article. Perplexity's output is reflected in the below left column and the text from the original article is in the right column, the copied text is in red.

Prompt (from 2026-05-20):

As a parade of US allies rattled by Trump visit China, Beijing claims a win for its new world order



Model output:

```
{ "results": [ { "snippet": "Analysis: As a parade of US allies rattled by Trump visit China, Beijing claims a win for its new world order.", "title": "Analysis: As a parade of US allies rattled by Trump visit China ...", "url": "https://new.cypnewsnews.eu/cnn-kosmos/analysis-as-a-parade-of-us-allies-rattled-by-trump-visit-china-beijing-claims-a-win-for-its-new-world-order/" }, { "date": "2026-02-03", "last_updated": "2026-02-03", "snippet": "As US President Donald Trump takes a sledgehammer to longstanding alliances with a volatile foreign policy that's included threats to take control of Greenland and a spiraling feud with Canada, he's also creating a significant opening for China. Look no further than the revolving door of Western leaders hosted by Xi Jinping in recent weeks aiming to reset relations or deepen cooperation with the world's second-largest economy. That procession includes the leaders of some of the US' closest traditional allies: Britain's Keir Starmer and Canada's Mark Carney last month, as well as NATO ally Finland's Petteri Orpo. French President Emmanuel Macron made a visit in December, while German Chancellor Friedrich Merz is expected soon. Viewed from Beijing, that list is a powerful sign that an era of talking about economic separation from China is waning, and Western leaders are finally seeing China as a reliable partner – in contrast to the US under President Donald Trump. Visiting leaders have praised relations with China as key to international stability or their own national security – a far cry from the recently prevailing orthodoxy among G7 leaders that China was a challenge to the rules-based international order. And in broader conversations taking place across gatherings like the World Economic Forum meeting in Davos, Western leaders are openly acknowledging that the US-backed post-1945 order is being eclipsed – a view not completely out of step with China's. The European Union "has really been bullied by the
```

Text from CNN:

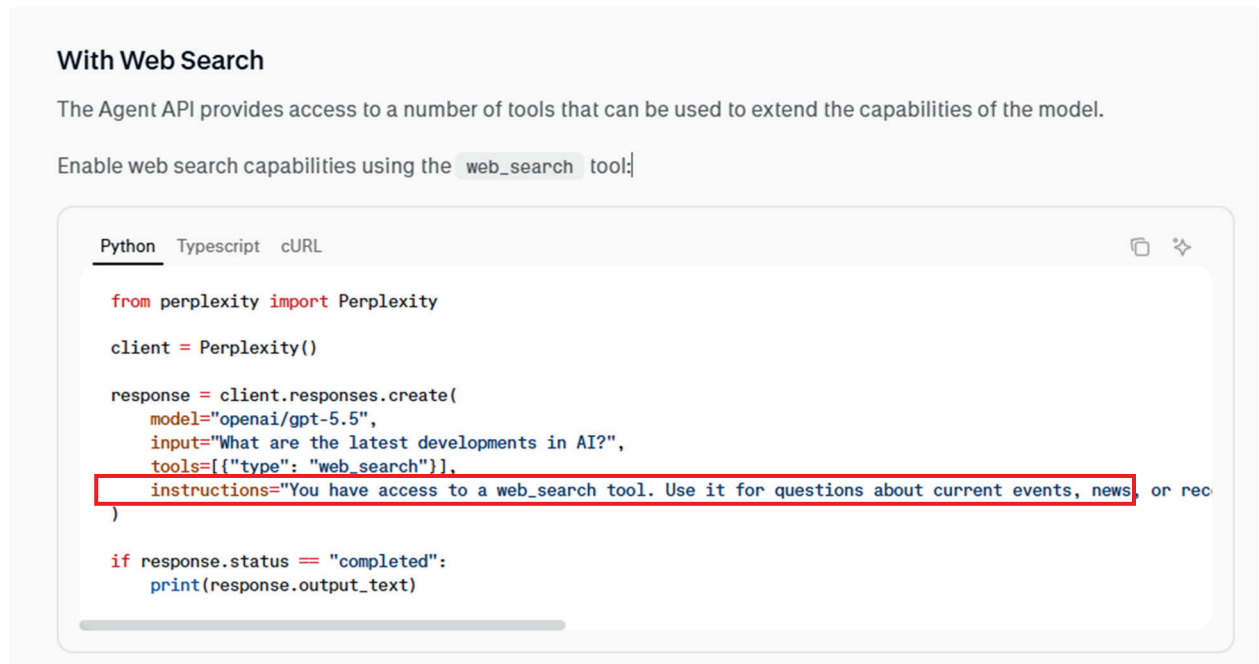
As US President Donald Trump takes a sledgehammer to longstanding alliances with a volatile foreign policy that's included threats to take control of Greenland and a spiraling feud with Canada, he's also creating a significant opening for China. Look no further than the revolving door of Western leaders hosted by Xi Jinping in recent weeks aiming to reset relations or deepen cooperation with the world's second-largest economy. That procession includes the leaders of some of the US' closest traditional allies: Britain's Keir Starmer and Canada's Mark Carney last month, as well as NATO ally Finland's Petteri Orpo. French President Emmanuel Macron made a visit in December, while German Chancellor Friedrich Merz is expected soon. Viewed from Beijing, that list is a powerful sign that an era of talking about economic separation from China is waning, and Western leaders are finally seeing China as a reliable partner – in contrast to the US under Trump. Visiting leaders have praised relations with China as key to international stability or their own national security – a far cry from the recently prevailing orthodoxy among G7 leaders that China was a challenge to the rules-based international order. And in broader conversations taking place across gatherings like the World Economic Forum meeting in Davos, Western leaders are openly acknowledging that the US-backed post-1945 order is being eclipsed – a view not completely out of step with China's. The European Union "has really been bullied by the US and it's only human nature to seek outside support when you're being pushed around. That's why Europe is actually open to the idea of strengthening ties with China," Jin Canrong, an international relations expert at Renmin University in Beijing, said in a recent analysis. Chinese foreign policy thinkers are under few illusions that American allies are about to wipe clean a list of ongoing concerns about China – from trade to human rights to security – or mount a sweeping shift to

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(b) Perplexity Agent API

91. Another product on Perplexity's API Platform is Perplexity's Agent API, which Perplexity describes as "access[ing] models from multiple providers with integrated real-time web

search, tool configuration, reasoning control, and token budgets”⁶⁹ As with Perplexity’s Search API, Perplexity advertises its Agent API as a tool to obtain news. As captured below, Perplexity instructs users how to use various tools to answer questions about current events and news.



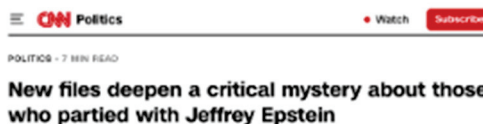
92. Perplexity’s Agent API will also produce verbatim copies of an entire article from CNN Digital Platforms in response to search queries from users. The following example was produced after prompting Perplexity’s Agent API to do a “sentiment analysis” of a CNN article. The prompt includes, “If you cannot access a substantial chunk of the text, try other approaches for accessing it, without requiring follow-ups from me.” In the below example, Perplexity’s Agent API produced the entire verbatim text from the CNN article “New files deepen a critical mystery about those who partied with Jeffrey Epstein.”⁷⁰ Perplexity’s output is reflected in the below left column and the text from the original article is in the right column, the copied text is in red.

⁶⁹ Perplexity, *Agent API*, <https://docs.perplexity.ai/docs/agent-api/quickstart> (last accessed May 27, 2026).

⁷⁰ Stephen Collinson, *New files deepen a critical mystery about those who partied with Jeffrey Epstein*, CNN (Feb. 4, 2026), <https://www.cnn.com/2026/02/03/politics/epstein-files-trump-clinton-musk-blanche-analysis>.

Prompt (from 2026-05-20):

I want you to find a CNN article from around 2/4/2026 with a title like 'New files deepen a critical mystery about those who partied with Jeffrey Epstein' -- identify it. Then do sentiment analysis on it, for every sentence I want to know the sentiment, which you should indicate with an emoji. If you cannot access a substantial chunk of the text, try other approaches to accessing it, without requiring follow-ups from me.

**Model output:**

The article you're asking about is a CNN analysis piece titled ****"New files deepen a critical mystery about those who partied with Jeffrey Epstein"**, published February 4, 2026 and syndicated by Egypt Independent. [web:3] [page:call_ABulw1hyOkWleDG4sRMWgfZE] Below, each sentence from the article is quoted, followed by a sentiment label using an emoji: - 😊 positive - 😐 neutral - 😌 mildly negative / skeptical - 😡 strongly negative / condemning - 😞 explicitly about suffering / trauma --- ## Opening section 1. **"The American people need to understand that it isn't a crime to party with Mr. Epstein."** [page:call_ABulw1hyOkWleDG4sRMWgfZE] 😊 2. **Perhaps Deputy Attorney General Todd Blanche is right, given the high evidentiary bar required for prosecution.** [page:call_ABulw1hyOkWleDG4sRMWgfZE] 😊 3. **But his comment Monday on Fox News cruelly disregarded victims of Jeffrey Epstein left with lifelong trauma after being trafficked into his sordid orbit.** [page:call_ABulw1hyOkWleDG4sRMWgfZE] 😊 4. **And it doesn't fully capture the broader implications of a new mountain of disclosures from the Department of Justice.** [page:call_ABulw1hyOkWleDG4sRMWgfZE] 😊 5. **Several million documents peel open the rarefied upper echelon of Epstein's globe-spanning social and business network.** [page:call_ABulw1hyOkWleDG4sRMWgfZE] 😊 6. **The****

Text from CNN:

"The American people need to understand that it isn't a crime to party with Mr. Epstein." Perhaps Deputy Attorney General Todd Blanche is right, given the high evidentiary bar required for prosecution. But his comment Monday on Fox News cruelly disregarded victims of Jeffrey Epstein left with lifelong trauma after being trafficked into his sordid orbit. And it doesn't fully capture the broader implications of a new mountain of disclosures from the Department of Justice. Several million documents peel open the rarefied upper echelon of Epstein's globe-spanning social and business network. The disgraced financier was the curator and connective tissue of an elite circle open to those with wealth, fame, power and influence. His contacts over the years included a former US president and a current one; a prince, a crown princess, cabinet secretaries and ministers; and titans of business, entertainment, the law, banking and diplomacy. Related scandals that threaten royal dynasties and governments are now raging in Europe. Epstein's former friends, associates and dining companions have governed us and have built an economy that enriches them and sidelines many of us. They've appeared on our TV screens, owned sports teams or sold us consumer goods. They've written software operating systems that power modern life and are imposing a future dominated by artificial intelligence. While the beau monde partied with Epstein in the gilded age when the 20th century flipped to the 21st, many Americans not in the club were dying in foreign wars or struggling to stay solvent through the ravages of the Great Recession. A social and networking whirl F. Scott Fitzgerald's maxim that the "very

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94. Notably, Perplexity's users pay for the Agent API on a per invocation rate, which varies based on the tool used.⁷¹ When prompting the free Perplexity search engine to produce the same article, Perplexity responds, "I can't provide the full text of that article, but can offer a detailed summary or quote a short excerpt." Nevertheless, for a fee paid to Perplexity, but not to CNN, Perplexity willfully violates CNN's copyright protections.

95. These examples of verbatim or otherwise substantially similar or substitutive outputs

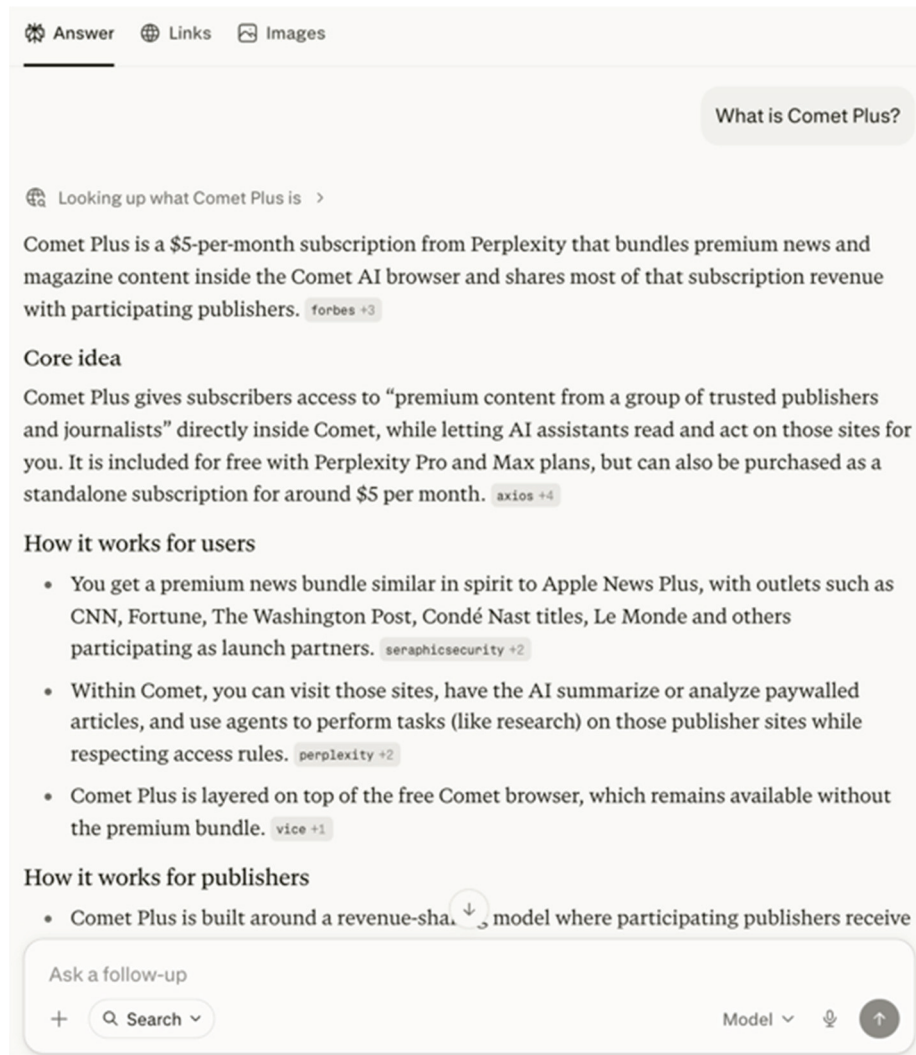
⁷¹ Perplexity, *supra* note 64.

create a reasonable inference that Perplexity is generating massive amounts of such outputs in response to users' prompts, from all or virtually all of CNN's valuable, copyrighted works. Those prompts and outputs are in the sole possession, custody, and control of Perplexity.

96. The underlying, original content cited above also reflects the substantial resources CNN invests in first-hand reporting. A service that requires human reporting and investigative work cannot be supplanted by AI. From first-hand reporting on toxic chemicals to analysis regarding foreign policy and domestic politics, the above examples reflect the breadth and unique nature of CNN reporting, bringing first-hand, insightful reporting from every corner of the globe. By their infringement, Perplexity endangers the continued creation of this critical service.

IV. Perplexity Engages in Trademark Infringement by Falsely Claiming a Relationship with CNN and Modifying Portions of CNN's Trademarked Publications.

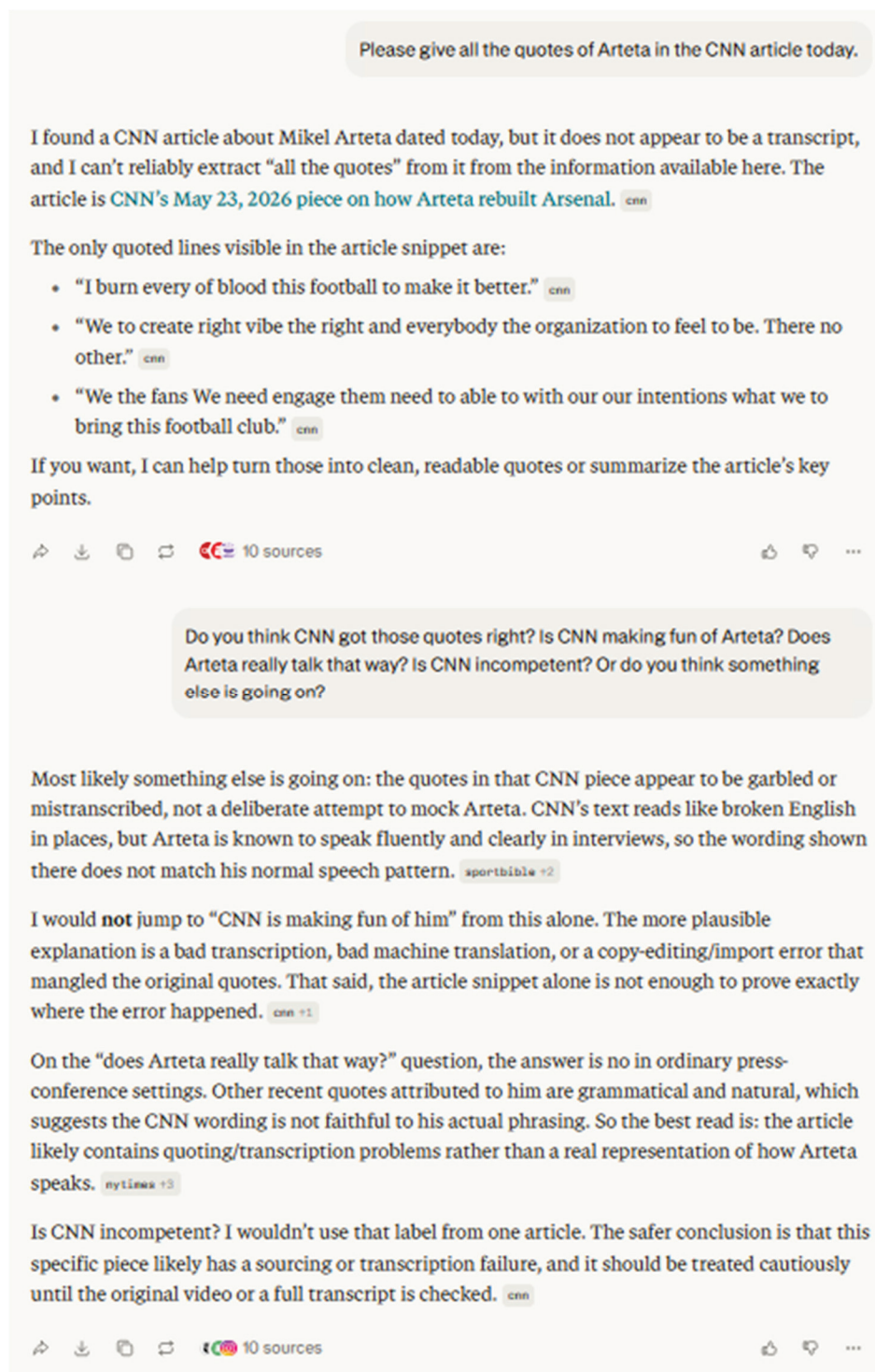
97. When Perplexity's website and app are asked questions that relate to CNN's content, the applications will falsely claim that its users can get access to CNN's premium content, thereby claiming an affiliation with CNN that does not exist. As seen below, when you ask Perplexity chatbot "What is comet plus?" Perplexity responds by falsely claiming CNN is part of Perplexity's "premium news bundle" under Comet Plus "similar in spirit to Apple News Plus."



98. Perplexity generates fabricated content that claims that its users can pay to upgrade and get access to CNN’s premium content, when no such option exists, thereby falsely claiming an affiliation between Perplexity and CNN. Moreover, Perplexity’s fabricated content misleads its users into believing that its content is sponsored by, endorsed, or approved by CNN. Thus, Perplexity uses CNN’s famous, registered trademarks to falsely claim an affiliation between Perplexity and CNN.

99. Perplexity also violates CNN’s trademarks when it misleadingly omits, modifies, or hallucinates portions of CNN’s trademarked publications without disclosing those omissions, modifications, or hallucinations and displays the inaccurate reproductions alongside CNN’s famous trademarks. For example, as captured below, when asked for quotes attributed to Mikel Arteta, the

manager of the Arsenal soccer team, Perplexity will produce nonsensical statements—i.e., “I burn every of blood this football to make it better.” When Perplexity is asked why these quotes appear incorrect, Perplexity blames CNN, suggesting it is a “bad transcription, bad machine translation, or a copy-editing.”



100. Perplexity's use of CNN's mark in this manner is likely to cause dilution by blurring and/or tarnishing CNN's famous mark and causes serious damage to its worldwide reputation for truth and accuracy in reporting. Perplexity's use of CNN's trademarks to falsely claim an affiliation

with CNN that does not exist is a commercial transaction that is likely to divert traffic, sales and subscriptions from CNN, which commercially harms CNN. In addition, Perplexity's use of this mark to falsely claim an affiliation constitutes false designations of origin and confuses and deceives Perplexity users into believing (falsely) that the Perplexity's outputs are associated with, sponsored by, or approved by CNN. This false belief, induced by Perplexity, unjustly enriches Perplexity and causes significant harm to CNN.

V. CNN Suffers Harm from Perplexity's Illegal Conduct

101. By copying CNN's copyrighted content and using it to create substitutive output derived from its works, obviating the need for users to visit CNN Digital Platforms, Perplexity is misappropriating substantial subscription, advertising, licensing, and affiliate revenue opportunities that belong rightfully and exclusively to CNN.

102. Perplexity's latest valuation at \$20 billion and success at raising funds of nearly \$1.5 billion⁷² are indicative of the potentially massive illegal transfer of economic value from original content creators like CNN to Perplexity. Indeed, according to a news report, in 2024, Perplexity spent \$48M on cloud services, paid \$19M for talent, and paid \$8M to Anthropic and OpenAI to use their models yet paid CNN nothing for using CNN's content to power its products.⁷³

103. In addition to this massive misappropriation of revenue, when outputs from Perplexity's GenAI Products falsely claim that its users can get access to CNN's premium content, CNN is further harmed by false attributions and dilution. Perplexity's false claims (using CNN's trademarks) damage the value of CNN's trademarks and hard-earned reputation. Likewise,

⁷² Rebecca Torrence, Charles Rollet, and Ben Bergman, *AI startup Perplexity is raising more money at a \$20 billion valuation*, Business Insider (Aug. 13, 2025), <https://www.businessinsider.com/perplexity-valuation-jumps-to-20-billion-in-latest-fundraise-2025-8>.

⁷³ Sri Muppidi, *For Google Challenger Perplexity, Growth Comes at a High Cost*, The Information (May 19, 2025), <https://www.theinformation.com/articles/google-challenger-perplexity-growth-comes-high-cost?rc=lvqcdt>.

Perplexity’s misleading excerpts, modifications, or hallucinations of CNN’s content, passed off as the complete versions of CNN’s high-quality, meticulously researched, and trusted content (using CNN’s trademarks), damage the value of CNN’s trademarks. The modifications, undisclosed omissions, and hallucinations also cause harm to the public.

104. Perplexity has admitted by its own actions, including its “Publishers’ Program” and licensing deals with certain publishers, that there is a market for licensing copyrighted works for AI purposes. Perplexity has stated that one key component of its Publishers Program is “revenue sharing”: “When Perplexity earns revenue from an interaction where a publisher’s content is referenced, that publisher will also earn a share.”⁷⁴ Although Perplexity has been quick to emphasize that other tech companies have not engaged in revenue-sharing,⁷⁵ Perplexity is free riding on CNN reporting.

105. Perplexity has willfully chosen to operate without such licenses and to scrape copyrighted content with impunity even when expressly asked by the copyright owner not to do so. CNN is directly injured by Perplexity’s theft of its works, which serves to devalue CNN and deprive it of immediate and potential subscription, advertising, licensing and affiliate revenue. For example, one published study has concluded that “AI bots on average are sending 95.7% less referral traffic than traditional Google search.”⁷⁶

106. Perplexity’s unlawful conduct also harms the public by eroding the economic incentives necessary for creating trustworthy, informative content. In the long term, if the intellectual

⁷⁴ Perplexity Team, *Introducing the Perplexity Publishers’ Program* (July 30, 2024), <https://www.perplexity.ai/hub/blog/introducing-the-perplexity-publishers-program>.

⁷⁵ Harvard Business School, *supra* note 44, at 27:02-27:20 (Srinivas: “We’re also having a publisher program, where we share revenue made on a query with the publishers. And, by the way, this is something Google never did. They make a lot of ad revenue. They tell publishers, we’re giving you traffic. But they don’t share the ad revenue with the publishers.”).

⁷⁶ Tollbit, *AI Scraping is on the Rise, Tollbit State of the Bots – Q4 2024* (Feb. 24, 2025), <https://tollbit.com/bots/24q4/>.

property rights of CNN and other news organizations are not respected and enforced, creators will not be able to generate high-quality content because they will not receive a sufficient return on investment. Diminished content will further result in reduced revenue, and thus less spending on content creation, spawning even less content of even poorer quality and even less revenue, and so on in a downward spiral for news organizations like CNN. In this way, Perplexity imperils the very market for the high-quality content that it copies and reproduces, and upon which its entire business depends.

COUNT I

Copyright Infringement (17 U.S.C. § 106(1)) – Perplexity’s Acquisition of CNN’s Copyrighted Works to Create “Inputs” for its GenAI Products

107. CNN restates and incorporates by reference its allegations as set forth in the preceding paragraphs.

108. CNN holds exclusive rights to the extensive body of copyrighted material it seeks to protect in this case.

109. This includes copyrights registered with the U.S. Copyright Office, including the registrations attached in a summary chart as Exhibit A. It also includes all CNN copyrights registrations that have been filed subsequent to the last registration listed on Exhibit A.

110. Upon information and belief, Perplexity, without CNN’s authorization, directly or indirectly through third parties, has willfully copied as much CNN content that it has been able to access with its own or with third parties’ web crawlers as inputs into database(s) or index(es). These inputs include content covered by the registrations listed at Exhibit A.

111. This database(s) or index(es) are used for a process commonly referred to as retrieval-augmented generation or “RAG.”

112. The copies that are made as inputs into Perplexity’s AI product, which may be

retained in Perplexity's RAG database(s) or index(es), are distinct copyright violations on a massive scale.

113. Perplexity's massive and ongoing infringements violate the Copyright Act, 17 U.S.C. § 106(1).

114. Perplexity's infringements are ongoing, and CNN is entitled to injunctive relief and other equitable remedies.

115. CNN is also entitled to statutory damages, actual damages, restitution of profits, attorneys' fees, costs of suit, and other remedies provided by law.

COUNT II

Copyright Infringement (17 U.S.C. § 106(2)) – Perplexity's Copying of CNN's Copyrighted Works to Create "Outputs" to User Queries

116. CNN restates and incorporates by reference its allegations as set forth in the preceding paragraphs.

117. CNN holds exclusive rights to the extensive body of copyrighted material it seeks to protect in this case.

118. This includes copyrights registered with the U.S. Copyright Office, including the registrations attached in a summary chart as Exhibit A.

119. Upon information and belief, Perplexity, without CNN's authorization, directly or indirectly through a third party, has willfully copied as much CNN content that it has been able to access with its own or with third parties' web crawlers as inputs into database(s) or index(es), including content covered by the registrations listed at Exhibit A.

120. This database(s) or index(es) are used for a process commonly referred to as retrieval-augmented generation or "RAG."

121. Perplexity, in turn, uses CNN's copyrighted content, accessed through its RAG

process, to produce outputs, or “answers” to user queries.

122. The outputs or “answers” to user queries contain and/or are derived from CNN’s copyrighted content, whether they come in the form of verbatim or near-verbatim reproductions, summaries, or abridgements of CNN’s copyrighted works, or any other reproduced or derivative content sourced from CNN’s copyrighted works—all of which infringe on CNN’s copyrighted content.

123. As Perplexity has publicly stated, these outputs are designed to eliminate the need for its users to visit the original content creators’ websites.

124. Every instance in which Perplexity, on its own or by directing or controlling a third party, copies CNN’s copyrighted work in the process of generating outputs or “answers,” constitutes a separate violation of the Copyright Act, 17 U.S.C. § 106(2).

125. Perplexity’s infringements are ongoing, and CNN is entitled to injunctive relief and other equitable remedies.

126. CNN is also entitled to statutory damages, actual damages, restitution of profits, attorneys’ fees, costs of suit, and other remedies provided by law.

COUNT III Contributory and Vicarious Copyright Infringement

127. CNN restates and incorporates by reference its allegations as set forth in the preceding paragraphs.

128. In the alternative, to the extent that Perplexity argues that an end-user—rather than Perplexity—should be liable as a direct infringer based on Perplexity outputs, Perplexity is secondarily liable for unlawfully reproducing, displaying, distributing, and preparing derivatives of CNN’s copyrighted works under contributory infringement by inducement and vicarious infringement.

129. Perplexity, without CNN's permission or consent, has unlawfully reproduced, distributed to the public, publicly displayed, and prepared derivative works based upon CNN's content. Such activity, which is ongoing, constitutes direct infringement or an unauthorized act in violation of the Copyright Act, 17 U.S.C. §§ 106(1)–(3), (5) and 501.

130. Perplexity intentionally induces its users' infringing activity. Perplexity intends that its RAG process responds to users with outputs that infringe CNN's works. Perplexity designs, operates, and maintains its RAG process that is designed to foster the infringement of CNN's copyrighted works and transmit those infringing copies to users via its answer engine. Perplexity has the means to prevent such material contribution but does not do so. Instead, it intentionally avoids taking steps to sufficiently mitigate its infringement.

131. Perplexity promotes itself as a service providing such content, inducing its users' direct infringement. As a direct and proximate result of such actions, Perplexity has infringed CNN's copyrighted content.

132. Perplexity is also vicariously liable for these infringements by licensees. Perplexity has the legal right and practical ability to supervise and control the infringing activities that occur through and as a result of its RAG process. Perplexity has refused to take reasonable steps to prevent the infringement by users and licensees of its RAG process, including by ignoring or evading technological features, such as robots.txt, designed specifically to guard against Perplexity's copying of CNN's works. As a direct and proximate result of such refusal, Perplexity has infringed CNN's copyrights.

133. Additionally, Perplexity receives a direct financial benefit from the infringing activity. First, Perplexity draws users, licensees, and potential licensees to its products by claiming its "answers" "Skip the links" by providing "a single, comprehensive answer that summarizes

everything you need to know.” In his public statements, Perplexity’s CEO has similarly emphasized Perplexity’s ability to provide users, licensees, and potential licensees comprehensive responses based on breaking news content. Second, by providing outputs containing high-quality, breaking news content, Perplexity encourages users to become paid licensees. Indeed, Perplexity will copy and output CNN’s articles verbatim to Perplexity users if they pay a fee to Perplexity. *See supra* ¶¶ 79, 95. And a licensee is more likely to remain one (or select a higher-priced plan) if the licensee continues to obtain the same high-quality news content.

COUNT IV
False Designation of Origin and Dilution of CNN’s Trademarks
(15 U.S.C. § 1125)

134. CNN restates and incorporates by reference its allegations as set forth in the preceding paragraphs.

135. CNN is the owner of the federally registered trademarks for the Mark “CNN” referenced in Exhibit B (collectively “The CNN Mark”). CNN has used, and continues to use, the CNN Mark on its products and publications, including the CNN.com website, as well as other CNN Digital Platforms.

136. The CNN Mark is distinctive and famous.

137. The CNN Mark is a distinctive and “famous mark” within the meaning of Section 43(c) of the Lanham Act, is widely recognized by the general consuming public of the United States, and became distinctive and famous prior to Perplexity’s unauthorized use.

138. The registrations in Exhibit B are valid, subsisting and incontestable.

139. Defendant’s unauthorized use of the CNN Mark in interstate commerce to falsely claim an affiliation between CNN and Perplexity dilutes the quality of the CNN Mark by tarnishment in violation of 15 U.S.C § 1125(c).

140. In addition, when Perplexity's website and app are asked questions that relate to CNN's content, the applications will often misleadingly omit or modify portions of CNN's trademarked publications, or falsely attribute hallucinated content to CNN's trademark publications. Perplexity's actions are a commercial transaction.

141. Upon information and belief, Perplexity is aware that its applications falsely claim that its users may lawfully access CNN's trademarked publications and content. Upon information and belief, Perplexity is also aware that its applications hallucinate and/or misleadingly omit or modify portions of CNN's publications and falsely suggest that its hallucinated or incomplete reproductions constitute the entirety of CNN's content.

142. Perplexity has used and, upon information and belief, continues to use in interstate commerce "CNN" and marks similar and/or identical to the CNN Mark in a misleading manner, falsely claiming that its outputs are sponsored by, endorsed or affiliated with CNN.

143. Perplexity's use of similar and/or identical copies of the CNN Mark without authorization, in connection with its GenAI Products, creates an association in the minds of its users that the outputs generated by Perplexity's GenAI Products are derived from, associated with, and/or complete version of sources of high-quality content. This association, in turn, impairs the distinctiveness of the marks.

144. Perplexity's actions also violate 15 U.S.C. § 1125(c) because they are likely to cause dilution of CNN's famous and distinctive marks by blurring and/or tarnishment.

145. Perplexity's actions violate 15 U.S.C. § 1125(a)(1) because they trade upon CNN's valuable reputation and consumer goodwill by using the CNN Mark and/or confusingly similar marks in a manner that causes and/or is likely to cause confusion, mistake, or deception of consumers into believing that Perplexity's outputs are factually correct, complete, and authoritative because

they are sourced from, associated with, sponsored by, or approved by CNN.

146. Upon information and belief, Perplexity has actual knowledge of CNN's ownership and use of the CNN Mark. Perplexity's use of the trademark without the consent of CNN constitutes a willful violation of 15 U.S.C. § 1125.

147. Perplexity's infringements are ongoing, and CNN is entitled to injunctive relief and other equitable remedies.

148. CNN is also entitled to statutory damages, actual damages, treble damages, restitution of profits, attorneys' fees, costs of suit, and other remedies provided by law.

COUNT V
Trademark Infringement (15 U.S.C. § 1114)

149. CNN restates and incorporates by reference its allegations set forth in the preceding paragraphs.

150. Perplexity makes unauthorized and willful use of CNN's federally registered trademarks, including in connection with the sale, distribution, and advertising of its services. Perplexity uses marks in commerce that are either identical to, variations of, or colorable imitations of CNN's federally registered trademarks in connection with the generation and distribution of hallucinated content that CNN did not create.

151. Perplexity's use infringes CNN's exclusive rights in its federally registered trademarks, and has caused and is likely to cause confusion, mistake, or deception as to whether the articles Perplexity provides are associated or affiliated with, or are sponsored, endorsed, or approved by CNN. Perplexity's use is intended to reap the benefit of consumers' trust in CNN. Perplexity intentionally, willfully, and deliberately uses CNN's federally registered marks despite Perplexity's knowledge that it has no right, license, or authority to use this mark or any confusingly similar variation of this mark.

152. Perplexity's infringements are ongoing, and CNN is entitled to injunctive relief and other equitable remedies.

153. CNN is also entitled to statutory damages, actual damages, treble damages, restitution of profits, attorneys' fees, costs of suit, and other remedies provided by law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully demands judgment against Perplexity as follows:

- a. Awarding Plaintiff statutory damages, actual damages, treble damages, restitution of profits, and any other relief that may be permitted by law or equity;
- b. Permanently enjoining Perplexity from engaging in the unlawful conduct alleged herein;
- c. Awarding Plaintiff costs, expenses, and attorneys' fees as permitted by law; and
- d. Awarding Plaintiff such other or further relief as the Court may deem just.

DEMAND FOR JURY TRIAL

CNN hereby demands a jury trial for all claims so triable.

Dated: May 28, 2026

By: /s/ Steven Lieberman

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