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WILLIAM T. WALSH
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Nuwan Weerahandi,
9 Stires Way, Pittstown, NJ 08867
(908) 200-7792

Plaintiff and *Pro Se*

NUWAN WEERAHANDI,

Plaintiff,

vs.

Alia Shelesh
Evan John Young, Fullscreen, Inc.
YouTube, and Google, Inc.

Defendants.

US DISTRICT COURT OF NEW JERSEY
CIVIL DIVISION
Trenton District of New Jersey
DOCKET NO.:

CIVIL ACTION 16-6131 (BRM/TJB)

COMPLAINT
AND JURY DEMAND

COMPLAINT

Plaintiff Nuwan Weerahandi, for his complaint against the listed defendants, states and alleges as follows:

PARTIES

1. Plaintiff Nuwan Weerahandi (hereinafter "Weerahandi" is a US citizen residing at 9 Stires Way, Pittstown, New Jersey 08867. Mr. Weerahandi is currently unemployed.
2. Defendant Google, Inc. a US corporation with its headquarters at 1600 Amphitheatre Parkway, Mountain View, CA 94043, doing business in state of New Jersey.
3. Defendant YouTube, is Google subsidiary with its headquarters at 901 Cherry Ave., San Bruno, CA 94066, doing business in New Jersey.
4. Defendant Alia Shelesh and Defendant Evan John Young are US citizens, residing at 8454 W. Granada Rd, Phoenix-Maryvale, AZ 85031. Defendant Alia Shelesh holds YouTube username SSSniperwolf (<http://www.youtube.com/user/SSSniperWolf>).

5. Defendant Fullscreen, Inc. is a US corporation located at 8454 W. Granada Rd, Phoenix-Maryvale, AZ 85031.

VIOLATION OF FEDERAL LAWS

6. This action is brought against Defendants for violation of Federal and New Jersey state laws against Defamation causing much monetary and mental harm to Plaintiff.

7. Defendants Shelesh and Young published YouTube videos which slandered and defamed Plaintiff's character by falsely labeling him as a "Registered Sex Offender". The videos are listed as followed:

- a. <https://www.youtube.com/watch?v=LtIHdoXPLBg>
- b. <https://www.youtube.com/watch?v=2VEJ9i5GsNQ>
- c. <https://www.youtube.com/watch?v=nwViFqfeia4>

8. Despite Plaintiff's repeated requests, Defendant YouTube failed to remove the slandering videos. They were not removed even after Plaintiff reported the above videos for Harassment and Bullying.

9. Defendant Google hosted Google+ accounts and links which revealed private information including Plaintiff's real name, home address, e-mail, and phone number, thus placing Plaintiff in danger. The links and Google+ accounts were not removed even after Plaintiff reported them to YouTube for harassment, bullying, and violation of privacy.

10. Defendant Alia Shelesh filed on August 16, 2013 a false and malicious Digital Millennium Copyright Act (DMCA) takedown notice under penalty of perjury to falsely and maliciously take down Plaintiff's video, "*SSSniperWolf FACEBOOK CREEPERS Vlog Rant RESPONSE*" which he owns the copyright to. Under Section 512(f) of the DMCA any person who knowingly materially misrepresents that material or activity is infringing may be subject to liability for damages. Plaintiff then filed a counter-notification on August 16, 2013 appealing the take down and in doing so had to provide

his real name, home address, phone number, and e-mail. Plaintiff's video was subsequently reinstated as Plaintiff did not violate Defendant Shelesh's copyright.

11. Defendant Shelesh then disseminated Plaintiff's private information including his real name, home address, phone number, and e-mail to her followers and supporters who then posted Plaintiff's private information on the comments section of her videos, (<https://youtube.com/watch?v=HCxvhzWM7kY> <https://www.youtube.com/watch?v=LtIHdoXPLBg>), and their Google+ pages which will be listed in section 11D.

DAMAGE

12. As a result of Defendants' unlawful conduct, Plaintiff has been subjected to mental anguish, emotional distress, stress, anxiety, and harassment including racial harassment, death threats, and encouragement of suicide from Defendant Shelesh's subscribers on YouTube. Moreover, due to the Defendants falsely accusing Plaintiff as a "Registered Sex Offender", the plaintiff's repeated applications for jobs has been unsuccessful. Due to Defendant revealing Plaintiff's private information, including his address, Plaintiff's life has been in danger.

WHEREFORE, Plaintiff respectfully requests that the Court grant relief as follows:

- (A) Judgment in favor of the plaintiff and against the defendants;
- (B) Compensatory payment of \$300,000 by Defendants for monetary damage happened to Plaintiff, including inability for him to get a job due to Defamation of Plaintiff's character by Defendants;
- (C) The removal of all videos in which Plaintiff have been slandered and are listed as followed,
 - a. <https://www.youtube.com/watch?v=LtIHdoXPLBg>
 - b. <https://www.youtube.com/watch?v=2VEJ9i5GsNQ>
 - c. <https://www.youtube.com/watch?v=nwViFqfeia4>
 - d. <https://www.youtube.com/watch?v=TuxGC52c-zY>
- (D) The removal of all links on Google and the closure and banning of YouTube and Google+ accounts which violated Plaintiff's privacy by revealing Plaintiff's real name, home address, and


other personal details. The URL's are listed as followed (some links are broken but still appear on Google search results when "Nuwan Weerahandi EnigmaHood" is searched,

- a. <https://www.youtube.com/user/Albacorewing>
- b. <https://plus.google.com/100841232040939123418/posts/3djPX7ZFKxh>
- c. <https://plus.google.com/101113428702178067640>
- d. <http://www.myfunnyprofile.com/Nuwan-Weerahandi>
- e. https://pipl.com/n/nuwan_weerahandi/
- f. <https://www.advancedbackgroundchecks.com/nuwan+weerahandi>
- g. <http://socialgur.com/channel/UCziQXmtOteMDrPvg2D8ZC4w>
- h. <https://plus.google.com/116646340250442077450/posts/7VUiAvRt7RU>
- i. <https://plus.google.com/116646340250442077450/posts/BLaaCdV45Up>
- j. <https://plus.google.com/116646340250442077450/posts/WLckFvDrPhx>
- k. <https://plus.google.com/100841232040939123418/posts/FmwqwraDSR8>
- l. <https://plus.google.com/116646340250442077450/posts/eJB1rhbPmmM>
- m. <https://plus.google.com/100841232040939123418>
- n. <https://plus.google.com/116646340250442077450/posts/XNFfzJS3DDC>
- o. <https://plus.google.com/116646340250442077450/posts/KqHzu7g5aRP>
- p. <https://plus.google.com/116646340250442077450/posts/Ln9A7FB1Z1a>
- q. <https://plus.google.com/116646340250442077450/posts/3Ch8KMFVrDb>
- r. <https://plus.google.com/100841232040939123418/posts/PnGRraoGZ42>
- s. <https://plus.google.com/100841232040939123418/posts/9c1PBctuXjJ>

(E) That Plaintiff recover from the named defendants Plaintiff's attorney fees, costs of suit and disbursements.

(F) That Plaintiff provided with further relief as this Court deems just and proper for damaging Plaintiff's name, and for emotional Distress.

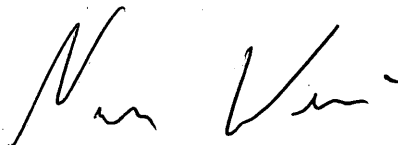
Dated: September 25, 2016


Nuwan Weerahandi

CETIFICATION

1. I Nuwan Weerahandi hereby certify as follows: I am the plaintiff for this matter; I make this certification in support of my complaint.
2. I hereby certify that the foregoing statements made by me are true and that if any of the foregoing statements are willfully false, I am subject to punishment. I also certify that a true copy has been delivered to the defendants, via certified mail.

Dated: September 25, 2016


Nuwan Weerahandi