

## **EXHIBIT B**

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EAST BATON ROUGE PARISH C-672398  
Filed Aug 09, 2018 8:51 AM 23  
Deputy Clerk of Court

NINETEENTH JUDICIAL DISTRICT COURT  
PARISH OF EAST BATON ROUGE  
STATE OF LOUISIANA

YAKUB MUHAMMAD

PLAINTIFF

VS.

YOUTUBE, LLC,

DEFENDANTS

YOUTUBE ENTERTAINMENT MEDIA LLC,

GOOGLE LLC,

SUIT NUMBER: 672398

Alphabet Inc (GOOG.O),

XXVI Holdings Inc.,

SECTION/DIVISION: 23

Larry Page,

Sergey Brin,

John L. Hennessy,

L. John Doerr,

Roger W. Ferguson, Jr.,

Diane B. Greene,

Ann Mather,

Alan R. Mulally,

Sundar Pichai,

Eric E. Schmidt, and

K. Ram Shriram

*Sharon Zito*



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**COMPLAINT FOR DAMAGES**

**COMES NOW**, the Plaintiff, Yakub Muhammad, by and through his attorney of record, hereby alleges as follows:

1. That on or about April 27, 2007, the Plaintiff, Yakub Muhammad, accepted the public offer of above said Defendants, in particular, YOUTUBE LLC, and opened a Youtube account under the username "Aconfly" a.k.a. "The Son of Man".
2. That for the past 11 years, the plaintiff has been producing and publishing content on the Defendants Platform, "YouTube", and has amassed a following of over 2000 subscribers as of the date of this filing.
3. That on or about March 8, 2011, the plaintiff uploaded to the Defendants's Platform, from his home computer in Baton Rouge, La, hereinafter Youtube, a video production entitled "Jim Jones, Marvin Muhammad and The New Nation of Islam Cult".
4. That in said video production of the Plaintiff, Plaintiff conveyed an expose' of a cult named "The New Nation of Islam" which is led by a charismatic man by the name Marvin Muhammad.
5. That in said production and subsequent uploads, the plaintiff informed the public at large of a religious cult whose leader raped and molested underage minors (girls) and used his influence to engage in adulterous sexual activities with the wives of brainwashed members.
6. That the said production, "Jim Jones, Marvin Muhammad and The New Nation of Islam Cult", was available on Plaintiff's YouTube Channel for over seven years.
7. That the said production, "Jim Jones, Marvin Muhammad and The New Nation of Islam Cult", had over 4000 views by the public for the said 7 year duration.
8. That as a result of this public service of the plaintiff, public commentary was posted by various members of the Youtube Community, to wit:
  - a. That on March 8, 2011 at 6:28 am, a comment was posted as follows:



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daniels37 has made a comment on Jim Jones, Marvin Muhammad and The New Nation of Islam Cult:

THIS MAN DOES NOT REPRESENT THE NATION OF ISLAM! THIS NEGRO HAS LOST HIS DAMN MIND. EVERYBODY WANTS POWER BUT DON'T HAVE THE INTELLIGENCE AND COMMON SENSE TO HANDLE IT. WHAT THE HELL IS GOING ON WITH OUR PEOPLE.

b. That on June 30, 2011 at 10:45 am, a comment was posted as follows:

Reallah1 has made a comment on Jim Jones, Marvin Muhammad and The New Nation of Islam Cult:

I met and LKnow marvin muhammad and I know he nuts and I believe all the stuff being said is tru about him, I'm still questioning the other stuff but to me if you need to talk to somebody for 12 hours and still have not got the the drift then clearly you need to stop talking and that's Marvin problem its like instead of giving you facts he talks long enough and drags in so many circles that you forgot what you were talking about in the first place. Unfortunately some people will go for anything

c. That on May 6, 2012 at 11:36 am, a comment was posted as follows:

rlinzie32 has made a comment on Jim Jones, Marvin Muhammad and The New Nation of Islam Cult:

I knew a girl that joined new nation and I really do believe in what you are saying. I would like to get in contact with to discuss what I have observed.

9. That the Plaintiff is a Minister of The Nation of Islam and has used his said Youtube Channel to warn the public of pedophiles and other criminal activity and to promote the practice of the Religion of Islam in its truest form.

10. That on Wednesday, July 18, 2018, seven years after said video production was uploaded and published on YouTube, the Defendant Youtube LLC, removed said video production from said channel.

11. That on Wednesday, July 18, 2018, Youtube sent Plaintiff a notice via e-mail entitled "Your video has been removed from YouTube " and relayed in pertinent part: "



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Hi The Son Of Man,

As you may know, our Community Guidelines describe which content we allow – and don't allow – on YouTube. Your video "Jim Jones, Marvin Muhammad and The New Nation of Islam Cult" was flagged for review. Upon review, we've determined that it violates our guidelines. We've removed it from YouTube and assigned a Community Guidelines strike, or temporary penalty, to your account.

12. That the defendant Youtube LLC, placed a 90 day restriction on Plaintiff's said account specifically preventing him from Live Streaming his Islamic Religious services or any other service that plaintiff provides to his subscribers and community at large.
13. That the action of the defendant Youtube LLC placing a 90 day restriction impairing and outright preventing the Plaintiff to speak freely during Live Stream on his Youtube Account as his fellow Youtubers are able to do, constitutes outrageous conduct.
14. That the said outrageous conduct is readily apparent due to the fact the the said production was continuously broadcasted for 7 years and the fact that it and subsequent uploaded productions was warning the public of a Pedophile in their midst.
15. That the said outrageous conduct was intentional.
16. That the said outrageous conduct caused the plaintiff extreme emotional distress part in parcel of the fact that his ability to freely speak and warn his community of dangerous criminals among them was being impaired by the defendants.
17. That the said outrageous conduct of the Defendants provides tacit support and refuge for pedophiles and con artists to molest the American Community.
18. That the Defendants owed the Plaintiff the Duty to take care of Plaintiff's Rights of Freedom of Speech and Religious Practices.
19. That the Defendants broke said duty of care to the Plaintiff.
20. That the Defendants are are the sole cause of the Plaintiff's herein injuries.
21. That the said outrageous conduct and subsequent injuries to the Plaintiff could not have happened without the willful and/or negligent actions of the Defendants.



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22. That the instrumentality of restricting and impairing the Plaintiff's said rights are solely in the Defendants control.
23. That the Plaintiff played no particular part in inflicting his own injuries.
24. That the Defendant's said emailed notice to the Plaintiff provided vague, obscure and indeterminable justification to impair his said rights.
25. That the plaintiff avers that the defendants induces Third Parties, i.e. YouTube members with adverse interests to the Plaintiff's, to file frivolous, superficial and or deceitful complaints or "flags" and the Plaintiff's Youtube Account to intentionally abuse and molest the plaintiff's aforementioned rights.
26. That the defendant's said inducement of third parties caused direct intentional aforementioned injury unto Plaintiff.
27. That the said inducement was not justifiable by the defendants.
28. That the defendants Advertise that YouTube is "as a forum for open expression by diverse speakers" and "an equal and diverse public forum".
29. That the defendants Advertise that YouTube's "mission" is to "give people a voice" in a "place to express yourself" and in a "community where everyone's voice can be heard".
30. That the defendants Advertise that YouTube is "one of the largest and most diverse collections of self-expression in history" that gives "people opportunities to share their voice and talent no matter where they are from or what their age or point of view."
31. That the aforementioned advertisements of the defendants constitutes the tort of "Deceit" due to the fact that the defendants made such advertisements with the intention of misleading the plaintiff and thus defendants are liable unto plaintiff for his injuries.
32. That the aforementioned advertisements of the defendants constitutes the tort of "Fraudulent Misrepresentation" due to the fact that the defendants intentionally made said false advertisements with the intention of causing injury to the plaintiff and thus defendants are liable unto plaintiff for his injuries..
33. That the aforementioned advertisements of the defendants constitutes the tort of "Negligent Misrepresentation" due to the fact that said



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advertisements were made without due care for its accuracy, and plaintiff;s said injuries resulted.

34. That the Communications Decency Act (47 U.S.C. § 230) immunizes online platforms for their users' defamatory, fraudulent, or otherwise unlawful content. Congress granted this extraordinary benefit to facilitate "forum[s] for a true diversity of political discourse."
35. That the Communications Decency Act (47 U.S.C. § 230) provides that "No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider".
36. That it is the exclusive duty, right, prerogative and public function of the State of Louisiana and Federal Government of The United States of America to facilitate, provide , promote and protect the 1<sup>st</sup> Amendment Rights of Freedom of Speech and Excercise of Religion of American Citizens.
37. That the Defendants , specifically Youtube LLC and Google LLC recieved more than \$630 million dollars from American Tax Payers in subsidies to initiate ,fund and maintain their perspective private enterprises.
38. That due to the fact that the defendants operate under United States Law with respect to the Communications Decency Act (47 U.S.C. § 230) Act to facilitate the government function of providing "forum[s] for a true diversity of political discourse", and are funded by the American Tax Payer, the defendants are deemed by United States Law as "State Actors" and are thus accountable to the American Citizen and are duty bound to uphold and jealously Protect The American Citizen Constitutional Rights and are subject to the strict scrutiny of The American Justice System just the same as any other Government agency.
39. That the Defendant YouTube LLC is a "for profit limited liability corporation" , dominciled in the State of California, and may be served legal process at the address of 901 CHERRY AVE, SAN BRUNO, CA 94066.
40. That the Defendant YOUTUBE ENTERTAINMENT MEDIA LLC is a "for profit limited liability corporation" , dominciled in the State of California, and may be served legal process at the address of 901 CHERRY AVE, SAN BRUNO, CA 94066.



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41. That the Defendant GOOGLE LLC is a “for profit limited liability corporation” , dominciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
42. That the Defendant XXVI Holdings Inc. is a “for profit limited liability corporation” , dominciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
43. That the Defendant Alphabet Inc (GOOG.O) is a “for profit limited liability corporation” , dominciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
44. That the Defendant YouTube LLC is a “for profit limited liability corporation” that is “wholly owned by” Defendant Google LLC, a “for profit, public corporation.” Both Defendants are “organized under the laws of the State of Delaware,” and have their principal place of business in Mountain View, California.
45. That the Defendant Google LLC is a “for profit limited liability corporation” that is “wholly owned by” Defendant Alphabet LLC, a “for profit, public corporation.” Both Defendants are “organized under the laws of the State of Delaware,” and have their principal place of business in Mountain View, California.
46. That the Defendant Larry Page is a Board of Director for Defendants Google LLC , dominciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
47. That the Defendant Sergey Brin is a Board of Director for Defendants Google LLC , dominciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
48. That the Defendant John L. Hennessy is a Board of Director for Defendants Google LLC , dominciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
49. That the Defendant L. John Doerr is a Board of Director for Defendants Google LLC , dominciled in the State of California, and may be served



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legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.

- 50. That the Defendant Roger W. Ferguson, Jr. is a Board of Director for Defendants Google LLC , domiciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
- 51. That the Defendant Diane B. Greene is a Board of Director for Defendants Google LLC , domiciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
- 52. That the Defendant Ann Mather is a Board of Director for Defendants Google LLC , domiciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
- 53. That the Defendant Alan R. Mulally is a Board of Director for Defendants Google LLC , domiciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
- 54. That the Defendant Sundar Pichai is a Board of Director for Defendants Google LLC , domiciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
- 55. That the Defendant Eric E. Schmidt is a Board of Director for Defendants Google LLC , domiciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
- 56. That the Defendant K. Ram Shriram is a Board of Director for Defendants Google LLC , domiciled in the State of California, and may be served legal process at the address of 1600 Amphitheatre Pkwy, Mountain View, CA 94043.
- 57. That the said defendants herein , regarded as a "Board of Director", has a legal duty to act in good faith...in the best interests of the perspective corporation with a level of care that "an ordinarily prudent person in a like position would use."



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58. That the said Board of Directors , by virtue of their duty to act in good faith of the corporation, are therefore bound to act in the best interests of the American Citizen due their legal status as "State Actors".
59. That the said defendant Board of Directors, as agents of other said defendants, breached their said duty to Plaintiff by implementing policies to prevent past and on going said outrageous conduct.
60. That the said contractual relationship between Plaintiff and Defendant was accepted and agreed upon and said video production created and uploaded and published to Youtube in Baton Rouge , Louisiana.
61. That the plaintiff is a citizen of the United State States and domiciled in the State of Louisiana at address 1040 Owl Ave, Baton Rouge, LA.
62. That the plaintiff aver that his Louisiana Constitutional Rights has been violated by the Defendants and he seeks redress for his personal injuries under Louisiana Law.
63. That The Louisiana Constitution states in Article 1 Section 7.: No law shall curtail or restrain the freedom of speech or of the press. Every person may speak, write, and publish his sentiments on any subject, but is responsible for abuse of that freedom.
64. That The Louisiana Constitution states in Article 1 Section 8. No law shall be enacted respecting an establishment of religion or prohibiting the free exercise thereof.
65. That The Louisiana Constitution states in Article 1 Section 9. No law shall impair the right of any person to assemble peaceably or to petition government for a redress of grievances.
66. That the Defendants violated the Plaintiff's Article 1 Section 7 Right granted by the Louisiana Constitution with respect to the aforementioned allegations made herein this complaint.
67. That the Defendants violated the Plaintiff's Article 1 Section 8 Right granted by the Louisiana Constitution with respect to the aforementioned allegations made herein this complaint.
68. That the Defendants violated the Plaintiff's Article 1 Section 9 Right granted by the Louisiana Constitution with respect to the aforementioned allegations made herein this complaint wherein the defendants impair the live assembly of the plaintiff and subscribers.



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69. That based on the aforementioned, The State of Louisiana 19<sup>th</sup> Judicial Court has proper Jurisdiction and venue to adjudicate this legal controversy.
70. That the Plaintiff avers that the actions of the Defendants, based on the averments herein, have irreparably damaged the Plaintiff's reputation and tardied his 11 year pursuit eventual status of a Mega Church Minister, who, on average recieves a revenue of \$6.5 Million Dollars.
71. That Louisiana Civil Code Article 3546 allows for punitive damages when 2 out of 3 elements are met: 1) the state where injury occurred allows punitive damages; (2) the state where injurious conduct occurred allows punitive damages; and (3) the state where defendant is domiciled allows punitive damages.
72. That the injurious conduct herein of this complaint occured in Louisiana.
73. That the defendants are Dominciled in the State of California.
74. That California Civil Code § 3294 permits a plaintiff to be awarded "punitive" damages in a personal injury cases. There is no cap on punitive damages in California personal injury cases.
75. That the plaintiff is entitled to punitive damages in regard to the aforementioned.
76. That Alphabet Inc., The YouTube and Google parent company, is worth over \$600 billion.
77. That the remedy of punitive damages in Louisiana and throughout the United States are designed to punish the defendant for outrageous misconduct and to deter the defendant and others from similar misbehavior in the future.
78. Plaintiff avers that due to the fact the defendants have a net worth of over \$600 Billion Dollars, an award of \$80 Billion dollars unto the plaintiff is a just, equitable and conservative punishment to be levied against the Defendants in favor of the Plaintiff.
79. That the Defendants, **YOUTUBE, LLC, YOUTUBE ENTERTAINMENT MEDIA LLC, Alphabet Inc (GOOG.O), XXVI Holdings Inc., Larry Page, Sergey Brin, John L. Hennessy, L. John Doerr, Roger W. Ferguson, Jr., Diane B. Greene, Ann Mather, Alan R. Mulally, Sundar Pichai, Eric E. Schmidt, and K. Ram Shriram** are liable unto Plaintiff **jointly and in solido** for their conduct of committing the torts of Deceit, Intentional Infliction of Emotional Distress, Loss of



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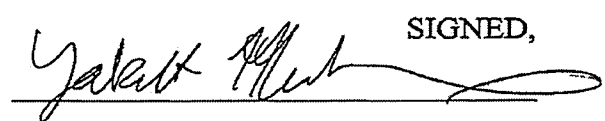
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Enjoyment of Life, Inducement, Res ipsa loquitur , Negligence, Negligent Misrepresentation, Fraudulent Misrepresentation, Defamation, in the amount of \$6.5 Million Dollars in compensatory damages.

- 80. That the Defendants, **YOUTUBE, LLC, YOUTUBE ENTERTAINMENT MEDIA LLC, Alphabet Inc (GOOG.O), XXVI Holdings Inc., Larry Page, Sergey Brin, John L. Hennessy, L. John Doerr, Roger W. Ferguson, Jr., Diane B. Greene, Ann Mather, Alan R. Mulally, Sundar Pichai, Eric E. Schmidt, and K. Ram Shriram** are liable unto Plaintiff jointly and in solido ,for their conduct of committing the torts of Deceit, Intentional Infliction of Emotional Distress, Loss of Enjoyment of Life, Inducement, Res ipsa loquitur , Negligence, Negligent Misrepresentation, Fraudulent Misrepresentation, Defamation, in the amount of **\$80 Billion Dollars in Punitive damages** in committing these torts with reckless behavior and through outrageous conduct.
- 81. That YouTube publically boasts that they have over 1 billion Subscribers on their platform. This company therefore boasts more political power than 98% of all countries on Earth.
- 82. That YouTube represents a clear and present danger to the American Republic and Electorate by siphoning Billions of dollars in American Taxpayer money to build their empire and laughingly circumvent The United States Constitution and castrating its Union with the American Citizen.

**WHEREFORE, ALL PREMISES CONSIDERED HEREIN, PLAINTIFF PETITIONS THIS HONORABLE AMERICAN COURT TO GRANT HIS RELIEF, UPHOLD WHAT IS LEFT OF AMERICA'S CONSTITUTION AND AWARD UNTO THIS PLAINTIFF \$6.5 MILLION DOLLARS IN COMPENSATORY DAMAGES AND \$80 BILLION DOLLARS IN PUNITIVE DAMAGES AGAINST THE DEFENDANTS , TORTFEASORS HEREIN.**

SIGNED,  


YAKUB MUHAMMAD  
1040 Owl Ave.  
Baton Rouge, LA 70805  
Phone # 313 264-7279

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