

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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DISTRICT OF NEW JERSEY
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2019 AUG 27 P 1:50

Brian L. Taylor d.k.a.

Brad Johnson

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Mark Zuckerberg and

Facebook

COMPLAINT

Jury Trial: Yes No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	Brian L. Taylor d.k.a. Brad Johnson
	Street Address	120 VANDER AVENUE Apt #3
	County, City	Essex County - Newark
	State & Zip Code	New Jersey 07112
	Telephone Number	862-340-9105

B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name Mark Zuckerberg and Facebook
Street Address 1 Hacker Way
County, City San Mateo, Menlo Park
State & Zip Code California 94025

Defendant No. 2 Name _____
Street Address _____
County, City _____
State & Zip Code _____

Defendant No. 3 Name _____
Street Address _____
County, City _____
State & Zip Code _____

Defendant No. 4 Name _____
Street Address _____
County, City _____
State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

A. What is the basis for federal court jurisdiction? (check all that apply)

- Federal Questions
- Diversity of Citizenship
- U.S. Government Plaintiff
- U.S. Government Defendant

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Civil Rights based on Age, Race, and Disability.

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship Newark, New Jersey

Defendant(s) state(s) of citizenship Menlo Park, California

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? (SEE ATTACHED)

B. What date and approximate time did the events giving rise to your claim(s) occur? (SEE ATTACHED)

C. Facts: (SEE ATTACHED)

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

IV. Injuries:

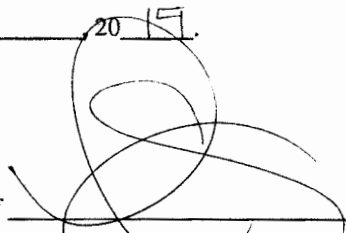
If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. (See Attached)

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation. (See Attached)

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 27 day of August, 2019.

Signature of Plaintiff 

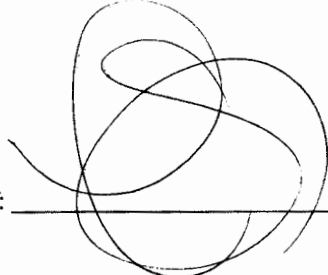
Mailing Address 120 VANDER AVENUE Apt #3
NEWARK, NEW JERSEY 07112

Telephone Number 862-340-9105

Fax Number (if you have one) _____

E-mail Address taylor.marcum@aol.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: 

II. Basis for Jurisdiction:

A. The following Claim falls under the Case classification of a "Federal Question."

B. The "Federal Question" is as follows: Was Claimant Brian L. Taylor a.k.a. Bras Dobane's Constitutional Civil Rights violated as applied via Invasion of Privacy committed against him through his membership on Facebook by Facebook, its Technical Support Apparatus as overseen by its Founder and CEO Mark Zuckerberg?

III. Statement of Claim:

A. 120 Vassar Avenue Newark, NJ 07112 as surveilled through and from daily, unwanted surveillance conducted by and at Facebook Headquarters in El Segundo, California.

B. Currently to this second, from approximately or since the inception of Client's Facebook membership or since 2008 or 2009.

C. Facts: From the first date of membership (roughly 2008 or 2009) to up-to and including this present day the Privacy of Client Brian L. Taylor a.k.a. Bras Dobane has been and is still continuously being invaded by Facebook Headquarters, its Technical Support Team as well as its owner and founder Mark Zuckerberg.

Each time Client Brian L. Taylor a.k.a. Bras Dobane creates and /or activates a "Post" of his, on average his amount of "Likes" by "Facebook Friends" only totals between 1 and 3 no matter how well written, well-said, or even well-meaning the "Post" is, which is strange. Second, on average his "Comments" made on other "Friends" Posts on average garners between 1 and 3 "Likes" no matter how well written, well-spoken or well-meaning the "Post" may be which too seems peculiar. Third, on average his "Comments" made on News or Newsworthy articles posted by his "Facebook Friends" also brings-in between 1 to 3 "Likes" no matter how well-written, well-said, or well-meaning the "Post" may be as well. Keep in mind that, with regard, to the latter two examples the "Friend," "Posting" the story, meme, or message etc. is one of the "Likers" (which may or may not constitute as a "given") but, no other "Friends" do, or does. Again, how is this possible?

Next, Claimant Brian L. Taylor a.k.a. Bras Dobane states that individually when contacted many of his "Friends" are quite cordial and, as he last remembers them, however in bulk seem to not be, due to a virtual endless stream of such "Posts," created by him and Uploaded onto his "What's On Your Mind" section of his Facebook page since his membership inception. Very little or no response. Yet other, less known or even notable "Friends" of his receives or are in receipt of many tens more "Likes" by these same friends and in some cases, such numbers total well in the hundreds.

Here is or are the reasons why all the above is/are so important to note:

College Friends:

Most of Claimant Brian L. Taylor a.k.a. Bras Dobane's "Friends," are collegiate in nature. Their common school is known as Virginia State University. Now consider, The Claimant is widely seen as the first Mr. Trojan (or Mr. Virginia State University or "Mr. VSU") in the school's history. A history that began in the Fall of 1991, which has since become and now remains a steadfast fixture at the University in excess of 28 years and counting. Please understand that this title was not easily attained as it was achieved by way of a Pageant with Judges, to which he was the youngest contestant or a First Semester Sophomore at the time. During his reign he treated everyone the same and was almost totally seen as a "cool" person. This is in stark contrast to the lack of "love" received on his Facebook page and thread by them daily, regardless of what he "Posts."

Now, the subsequent popularity received from becoming Mr. Trojan allowed him to add to his popularity by becoming a member of Alpha Phi Alpha Fraternity, Incorporated, or the oldest Black Male Greek Lettered Organization on the planet but also, allowed him to win (by "landslide") the Presidency of The Student Government Association, which was done through a democracy, or a campus-wide voting system. In fact, for nearly six months he held both the Title of Mr. Trojan and President of SGA simultaneously, or a feat and record that still stands to this very day!

Also, during his four years at the University he sat on two University Search Committees which he and a team of professionals reviewed hundreds of resumes that ended with the selection of not only the University's Provost or Highest Academic Vice President, but also The University's 12th President as well. The school is now enjoying their 13th currently. Now, that's not all because of the four years he attended Virginia State University, three of those years were spent on the Dean's List. Naturally he graduated in 1994 with Honors, not to mention more "Friends" than he could count, but that was just College.

How then could fellow students of his era, who were also high achievers at Virginia State University, but who did not "open the door," in many respects like he did, receive tens or even hundreds of "Likes" with ease for the slightest "Posts," while he would only receive 1 to 3 no matter the subject? Note: Since graduation his fellow College friends are currently scattered about the US. Yet despite this fact, seem uniform in their response or lack-there-of, regarding his every "Post?" What has or had he done so bad to hundreds of people at the same time and to the same extent for such a collective shunning? Many of whom he hasn't even seen personally in nearly ten years, while others who he did last see were at-least on "Good Terms" with him. Keep in mind that individually all or most seem normal, though not in bulk or, with respect to bulk responses. If such a term as "Joe College" exists, the Claimant was indeed "that Dude," which appears strangely in contrast to his Facebook persona.

These facts amount to an Invasion of Privacy permeated through Discrimination, based on the Claimant's Disability (**or Bi-Polar Disorder and Paranoid Schizophrenia**) which many of them may or may not know exists, yet, seem to present no logical reason to explain their behavior toward him.

All of these facts can be supported by: Virginia State University Yearbooks '92-'94, Virginia Statesman (Newspaper) articles '92-'94, The City Newspaper The Virginia Pilot '92-'93, the Claimant's many Citations and Awards, Dean's List Listings '91, '92, and '94, The Claimant's Facebook individual page and thread, as well as the Claimant's cell phone text and phone call threads.

High School Friends:

Although Claimant Brian L. Taylor a.k.a. Bras Dobane was not as popular in High School as in College, he did enjoy a large measure of notoriety through a High School Community Service and College readiness organization to which he was part, as well as his many friendships made while in Catholic High School Bishop Francis Essex Catholic. Yet, like his College Friends all are collectively hard-pressed to "Like" any of his Posts past the 1 to 3 "Likes" which he receives on average.

With no logical explanation to account for this sector of friends in his life either, these facts amount to an Invasion of Privacy permeated through Discrimination, based on the Claimant's Disability which many of them may or may not know exists, yet, seem to present no logical reason to explain their behavior toward him.

Grade School and Middle School Friends:

As mentioned even Grade School and Middle School Friends are also few if any to "Like" or actively engage Claimant Brian L. Taylor a.k.a. Bras Dobane in any way, yet remain cordial, as "Individual" friends of his on Facebook page. In fact, many of these friends he has not personally seen in years.

With no logical explanation to account for this sector of friends in his life, these facts amount to an Invasion of Privacy permeated through Discrimination, based on the Claimant's Disability which many of them may or may not know exists, yet, seem to present no logical reason to explain their behavior toward him.

Facebook Groups:

Among one of the most baffling aspects of Claimant Brian L. Taylor a.k.a. Bras Dobane's Facebook experience involves the fact that this streak of no "Likes," has even penetrated Facebook Groups whom know little of nothing of him prior to his entry into them. In fact, he believes that any new Groups joined by him on the site would confidently yield for him the same results, yet have little basis for why it does and will occur? Do these people know him? And, if so, how?

With no logical explanation to account for this sector of friends in his life, these facts amount to an Invasion of Privacy permeated through Discrimination, based on the Claimant's Disability which many of them may or may not know exists, yet, seem to present no logical reason to explain their behavior toward him.

Co-Workers of The Claimant:

Many Co-workers of the Claimant are now non-existent as well as better than 99% of the Younger Adults who the Claimant once had as Students. Strangely many do not even have Facebook accounts and are otherwise non-present on almost all other forms of social media.

This fact has also had a devastating impact on the Claimant as he was Terminated from his Teaching position due in large part, to his Disability.

With no logical explanation to account for this sector of friends in his life, these facts amount to an Invasion of Privacy permeated through Discrimination, based on the Claimant's Disability which many of them may or may not know exists, yet, seem to present no logical reason to explain their behavior toward him.

Family of The Claimant:

Aside the fact that members of his immediate family are making daily attempts to silence his presence on the site or to discredit him altogether, other extended family members have also been strangely inculcated into this abyss of silence or inaction as applied to any "Posts" created and uploaded by him. This group includes his own Daughter as well. This fact has only left Claimant Brian L. Taylor a.k.a. Bras Dobane to ask the very real question "Who Am I, Really?" Thankfully there seems to be a possible set of theories that may answer just that.

However, with no logical explanation to account for the behavior of this now sector of family members in his life, these facts amount to an Invasion of Privacy permeated through Discrimination, based on the Claimant's Disability which many of them may or may not know exists, yet, seem to present no logical reason to explain their behavior toward him.

Hidden Friends:

Now, what's interesting is that since Claimant Brian L. Taylor a.k.a. Bras Dobane has amassed so many Friends in his life thankfully all are not part of the, some 444 "Friends" he now has on Facebook. These friends, many of whom he has not seen in years or even tens of years, he is prepared to contact at a moments notice, (if necessary) to show that even they, like all of the 444 known Friends on Facebook can and will follow the exact pattern as previously highlighted regarding the rest/others.

With no logical explanation to account for this sector of "Hidden" friends in his life, these facts amount to an Invasion of Privacy permeated through Discrimination, based on the Claimant's Disability which many of them may or may not know exists, yet, seem to present no logical reason to explain their behavior toward him.

Negative Effects of the Claimant's attempt(s) at attaining income through Commerce:

Additionally, as an author Claimant Brian L. Taylor a.k.a. Bras Dobane has written two books, one of which he has shared with his Facebook Community in order to see if they would want to support or even purchase copies. However, this "Post," failed to receive more than 3 "Like," and no purchases as was his thought prior to sharing the "Post/Advertisement" in the first place.

As a result of so much of this treatment Claimant Brian L. Taylor a.k.a. Bras Dobane has been Institutionally committed a total of 5 occasions (to 5 different Psychiatric Facilities in New Jersey), treated by an Behavioral Health Out-Reach Program since 2012, to which he grows stronger each day

from and is even thinking about working in the field as well as a Peer Advocate, as he has had some Training in the field since 2014. However, the prolonged, daily, and much sustained desperate treatment (Invasion of Privacy and Discrimination) by Facebook, Technical Staff and founder and CEO Zuckerberg has further forced him to seek Personal Injury (Mental), Willful Negligence, Conspiracy as well as Racial Discriminatory Relief from the Defendant(s) immediately for violation of various State and Federal Laws up to and including Invasion of Privacy as well a violation of the ADA or American With Disabilities Act.

No one else was involved aside his Facebook Friends who constitute either as willing or unwilling parti Most, if not all Facebook Friends may or may not be needed to serve as witnesses.

IV. Injuries:

Claimant Taylor a.k.a. Dobane now feels that irreputable harm may have been done to his circle of Friends and Family along with severe damage to his character and persona. He finds trusting people to be quite difficult, if not impossible which is compounded by the fact that he already suffers legally and clinically from Bi-Polar Disorder and Paranoid Schizophrenia. The classification of such disorders were first discovered, diagnosed and determined by The East Orange School District (for which he worked 10 years as a Teacher) through services rendered by a Dr. James Cowan and served as the basis for his termination back in 2009 which subsequently led to a Disability Retirement granting.

Since his Termination from the East Orange due to his illness, he even tried unsuccessfully to re-enter the field of Retail employment. Sadly however, he was Terminated by both of his Part-time jobs on the same day, this past April 12, 2019 (done within minutes of one another).

Note, these two latest terminations served as both a necessary and collective attempt to try and resume his life, given these handicaps. However though honorable in aim, nonetheless sadly, both have proven to counter his efforts in terms of aiding him in his recovery which makes working in such conditions (and most others) as virtually hopeless (to him) in terms of trust in his ability to perform (without hinderance), and two, the uncertainty of employment circumstances, cultures, and clientele which are inevitable realities in most other forms of employment. Now, because of his Facebook experiences he found making new friends also nearly impossible, so he remained or stayed largely to himself (CDS: since 2012 and AM Retail: since 2017). Therefore, he may very well never work again, although he had contemplated a return to the classroom, which he has now changed his mind toward due to the daily Invasion of Privacy, Discrimination, etc. suffered by the Defendants. Most regrettably he may very well have to start all over with old friends as well as to bravely attempt to finally, forge new ones, with others.

V. Relief:

Claimant Taylor a.k.a. Dobane is presently asking for a settlement in excess of at-least \$50 Billion dollars, or the amount of (a would be) 85k yearly salary over a twenty-to-twenty five year period plus comparable retirement occurring after, quality of life through a more conducive environment (perhaps relocation to another town, city, state or country) in order to prevent what would or could exacerbate or even trigger his condition again, the cost of living associated with such an/a (extremely possible) "move" or change of environment, the cost of living along with any and all associated (projected) inflation over that time, any and all missed professional opportunities (and commerce) associated or surrounding the termination (and after) and the re-emergence of his condition, any cost of therapeutic practices or treatment not covered by any and all Health Insurance Providers (at the time), the cost of his own personal Doctor and legal representative (because the claimant is in possession of vast amounts of Intellectual Property and must require at-least an Intellectual Property Attorney), who may have to travel or even live with him (as their sole client) along with comparable salary over that time, as well as well as an overall attempt to relieve him of any mental trauma brought-on by the conditions of his affliction and treatment sustained by him. Finally, this settlement request seeks to serve as a Justice measure for the perpetrators, given the fact that the entire "Social Media" universe though common, still remains quite new, untested and unexplored to average people, citizens, as seen through the eyes of the existing Civil and Criminal Justice System, especially with regard to its wonton abuse and misuse or surveillance and its power.