

**IN THE UNITED STATES  
DISTRICT COURT SOUTHERN  
DISTRICT OF FLORIDA**

FILED BY   000   D.C.  
  
JAN 15 2021  
  
ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - W.P.B.

**NUSRAT RIZVI**

9190 Cypress Hollow Drive  
Palm Beach Gardens, FL  
33418

Plaintiff

vs.

**GOOGLE, LLC**  
1600 Amphitheatre  
Parkway, Mountain View  
California 94043

§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO.

**PLAINTIFFS' COMPLAINT AND DEMAND FOR JURY TRIAL**

There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this Complaint pending in this Honorable Court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a Judge.

COMESNOW, NUSRAT RIZVI, Plaintiff" via *Pro Se* submission, (here in named as "Plaintiffs"), now hereby bring this Complaint for Damages against defendant Google, LLC., and alleges as follows:

**PARTIES**

1. Plaintiff, NUSRAT RIZVI is an individual and a resident of Palm Beach County, Florida. He brings this claim on behalf of himself.
2. Defendant is a GOOGLE LLC, an online media platform, located at 1600 Amphitheatre Parkway, Mountain View, California 94043 United States

### **JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction under 28 U.S.C. §1331 (federal question) as this civil action is brought under Title II of the **Civil Rights Act**, codified as, 42 U.S.C. §§ 2000a et seq.
4. Plaintiff NUSRAT RIZVI is an individual and a resident of Palm Beach County, Florida.
3. Defendant, GOOGLE LLC., is located at 1600 Amphitheatre Parkway, Mountain View, California 94043 United States operating a video sharing website located at [www.youtube.com](http://www.youtube.com), authorized to conduct business in the state of Florida.
5. Venue is proper in this District, because a substantial part of the events giving rise to the claims occurred in this District pursuant to 28 U.S.C. §1391 (b) (2).
6. That this Honorable Court has Supplemental Jurisdiction over state claims as prosecuted herein, pursuant to Title 28 U.S.C. § 1367, where they are related to the Federal Question presented, (**violations of the Civil Rights Act (Title II USC § 42 et seq.)**) which the court has original jurisdiction over.

### **BACKGROUND**

8. Plaintiff utilized YouTube owned by parent company Google LLC, for creative expression and information purposes.
9. Plaintiff uploaded content on the YouTube, LLC, platform, which is owned by defendant Google, LLC., operates a video sharing website located at [www.youtube.com](http://www.youtube.com), pertain to his outward beliefs which was based on passage

written by the 3<sup>rd</sup> President Thomas Jefferson.

10. Google allowed a minimal amount of viewers to engage in the content.
11. Defendant had removed the content blocking plaintiffs posting abilities on their site.
12. Plaintiff Complied with the terms and conditions YouTube has established by not posing a threat, physical harm, violence or obscenity.
13. Plaintiff used YouTube.com as a channel for communicating and interacting with the public about his beliefs.
14. Plaintiff followed all content and conduct clauses outlined by the Defendant.

**COUNT I, VIOLATION OF DISCRIMINATION BASED ON RELIGION  
AND NATIONAL ORIGIN: GOOGLE, LLC**

15. Plaintiffs incorporate the allegations contained in paragraphs 1 through 14 of this Complaint as if entirely rewritten herein.
16. Plaintiff brings his complaint against Google, LLC, a social media video company platform where videos can be uploaded and viewed or commented on by other subscribers on the site.
17. Plaintiffs name is a pure indication of his national origin. Plaintiff was humiliated and felt a sense of ridicule as a direct result of the defendant's previous actions.
18. Plaintiff was deprived and not afforded the right the use of service due to voicing his religious beliefs.
19. Plaintiff was deliberately targeted and denied access by the defendant based on his religious beliefs and national origin.
20. Failure to accommodate plaintiffs' thought, beliefs and post on YouTubes Platform Title II of the civil rights Act.

WHEREFORE, Plaintiff request that this Honorable Court enter judgment against the defendants for their willful violation of Plaintiffs' Civil Rights, Religious Views and National Origin. Plaintiffs is seeking the content be allowed and the suspension be removed. Damages not less than \$1,000,000 and not More than \$10,000,000; awarding Plaintiff costs associated with bringing suit; and awarding Plaintiffs any other relief deemed just and proper.

**JURY TRIAL DEMAND**

Plaintiffs' demand a jury trial for each claim and causes of action to the extent permitted by law.

Respectfully Submitted,



Nusrat Rizvi,  
Address: 9190 Cypress Hollow Dr.,  
Palm Beach Gardens, FL, 33418

Email:

*Pro Se Plaintiff*