

1 Julian Barnes aka
2 Titus Lee Barnes
3 VSP (B4-28-3L)
4 P.O. Box 92
5 Chowchilla, Ca.93610

6 In Pro Se

FILED

Jul 15 2025

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 JULIAN BARNES aka

11 TITUS LEE BARNES

12 Plaintiff;

13 -v-

14 YouTube, Inc., YouTube, LLC.;

15 AND JOHN DOE d/b/a EVIL STREETS

16 TV; Sued Individually;

17 Defendant(s)

CASE No. 25-cv-5901-VKD

COMPLAINT
COPYRIGHT INFRINGEMENT
17 U.S.C § 501.

PRELIMINARY AND PERMANENT
INJUNCTION

17 U.S.C. § 502.
DAMAGES AND PROFITS
17 U.S.C. § 504.

DEMAND FOR TRIAL

18
19
20 A. INTRODUCTION

21 This is a civil action filed by Julian Barnes aka Titus Lee Barnes
22 (Hereinafter "Plaintiff"), author of Drug Lords of Oakland®
23 [TX 8-646-340, date: 09/05/18], for damages, profits and injunctive
24 relief under 17 U.S.C. §§ 501., 502., 504., Plaintiff, alleging
25 Copyright Infringement under three theories of liabilities: Direct,
26 contributory and vicarious liability in violation of the fifth
27 Amendment to the Constitution to the United States Constitution,
28 and brings this action to redress against Defendant(s) each

1 one of them under the Seventh Amendment to the United States Con-
 2 stitution. for violations of Plaintiff's constitutional rights.

3 2. The true name or capacities, whether individual, corporate, ass-
 4 ociate, governmental or otherwise of Defendant, John Doe, are un-
 5 known to, Plaintiff, at the time of filing this complaint, who
 6 therefore sues said, Defendant(s), by such fictitious names. When
 7 the names and capacities of said Defendant(s) are ascertained,
 8 Plaintiff, will amend this complaint accordingly.

9 3. Plaintiff, is informed and believes, and thereon alleges, that
 10 each of the Defendant(s) designated herein as John Doe, is respon-
 11 sible, negligently or in some other actionable manner, for the ev-
 12 ents and happenings herein set forth and proximately caused injury
 13 to the Plaintiff as herein alleged.

14 4. Plaintiff, is informed and believes and thereon alleges that, at
 15 all times mentioned, Defendant John Doe, was the agent of Defendant
 16 YouTube, Inc., d/b/a/YouTube LLC., (Hereinafter "youtube"), and, in
 17 doing the things hereinafter alleged, was acting within the course
 18 and agency and with the permission and consent of his/her defend-
 19 ant.

20 B. JURISDICTION

21 5. Court. has jurisdiction over the plaintiff's claims of violation
 22 of constitutional rights under 28 U.S.C. § 1331, in that this is a
 23 civil action arising under the Constitution of the United States.

24 6. Jurisdiction of the Court is invoked pursuant to 28 U.S.C. § 1343
 25 (a)(1) in that this action seeks to recover damages for injury to
 26 this person or property.

27 C. VENUE

28 7. Venue is proper in this court under 28 U.S.C. § 1391(b)(2) because

1 cause it is a judicial district which a substantial part of the
 2 events or omissions giving rise to the claim occurred, or a sub-
 3 stantial part of the property that is subject of the action is
 4 situated;

5 D. INTRODUCTION OF PARTIES

6 8. Julian Barnes aka Titus Lee Barnes (Hereinafter "Plaintiff") is
 7 at all times mentioned herein the author, owner and official copy-
 8 right holder of Drug Lords of Oakland® [TX 8-646-340, date:9/5/18].

9 9. YouTube, Inc., d/b/a YouTube, LLC., (Defendant) (Hereinafter
 10 "YouTube") during all times mentioned is the internet service pro-
 11 vider responsible for the Infringement of, Plaintiff's, copyright,
 12 causing irreparable and unappreciated injuries to, Plaintiff's book-
 13 sales and brand whether directly, contributory or vicariously or
 14 otherwise. YouTube is sued in its individual capacity. At all times
 15 mentioned, YouTube, acted within the course and the scope of its
 16 business structure under the color of law in the United States.

17 10. Plaintiff, alleges that, defendant, YouTube, financially benef-
 18 itted as a result of the Copyright Infringement alleged by the
 19 Plaintiff, also, Plaintiff, alleges, that, YouTube, exercises
 20 control over the direct infringer.

21 11. Defendant, John Doe d/b/a/Evil Streets TV (Hereinafter
 22 "John Doe") during all times mentioned is responsible for Copy-
 23 right Infringement against, Plaintiff's, intellectual property in
 24 the form of Drug Lords of Oakland® [TX 8-646-340], by uploading and
 25 reproducing, during the performance and display of videos, several
 26 chapters of Plaintiff's book, to its YouTube channel, Evil Streets TV.

27 12. Plaintiff, alleges that, John Doe, had prior knowledge and
 28 was aware of the unconstitutional application(s) of each video dis-

1 played on its YouTube channel in association with, Plaintiff's book
2 Drug Lords of Oakland based on the caption attached to each video
3 stating "INFORMATION FOR THIS VIDEO WAS OBTAINED FROM DRUG LORDS OF
4 OAKLAND BY TITUS LEE BARNES."

5 13. Plaintiff, alleges that YouTube, did not act swiftly enough to
6 safegaurd , Plaintiff, from unwanton injuries inflicted upon his
7 booksales and brand as a result of "John Doe's" malicious, in-
8 fringing activities perpetrated on YouTube's platform for two reas-
9 ons, (1) Subscription based funds, (2) Ad-based funds, generated by
10 Evil Streets TV.

11 14. Plaintiff, alleges that Evil Streets TV is a monetized YouTube
12 channel with upwards of 46k subscribers.

13 15. Plaintiff, alleges that "John Doe" is a signed member of
14 YouTube Partner Program (YPP), and is eligible to receive 55% of
15 net revenues recognized by YouTube ads displayed...in conjunction
16 with the streaming [the participants] content, and YouTube will pay
17 [the participants] 55% of the total net revenues recognized by You-
18 Tube from subscription fees (YPP users).

19 16. Plaintiff alleges that his booksales suffered immensely as a re-
20 sult of this infringement as well as numerous other unappreciated
21 injuries imposed upon his brand.

22 E. FACTUAL ALLEGATIONS

23 17. On or about April 17, 2025, Defendant, John Doe, was the
24 operator/account holder of the Evil Streets TV channel on YouTube
25 that displayed a thirty-seven minute and five second video titled,
26 Meet Oakland's LEGENDARY GANGSTER Felix "The Cat" Mitchell. During
27 the performance and display of this video, John Doe, [Operat-
28 or/account holder] narrated, Chapter one (Big Fee) of Drug Lords of

1 Oakland and displayed copyrighted photographs while running b-roll
2 film footage in tandem with the narration of, Plaintiff's, book con-
3 tent.

4 18. On or about May 19, 2025, JOHN DOE, Defendant, as the op-
5 erator/account holder of the Evil Streets TV channel on YouTube, did
6 display a twenty-two minute and twenty-nine second video titled,
7 Meet Oakland's LEGENDARY KINGPIN Harvey "Funktown Harv" Whisenton.
8 During the performance, and display of this video, JOHN DOE,
9 [Operator/account holder] narrated, plagiarized and reproduced
10 Chapter three, (Funktown Harv) of Drug Lords of Oakland, while dis-
11 playing copyrighted photo's and running b-roll film footage in tan-
12 dem with the narration of Plaintiff's, book content. (See caption)

13 Caption: "INFORMATION FOR THIS VIDEO OBTAINED FROM DRUG LORDS OF
14 OAKLAND BY TITUS LEE BARNES".

15 19. On or about May 22, 2025, JOHN DOE, Defendant, as the op-
16 erator/account holder of the Evil Streets TV channel on YouTube, did
17 display a video titled, Meet Oakland's LEGENDARY KINGPIN Milton
18 "Mick Mo" Moore. During the performance and display of this video
19 JOHN DOE, [Operator] posted, narrated, plagiarized and reproduced and
20 transmitted, Chapter two (Mick Mo) of Drug Lords of Oakland, while
21 displaying photo's and running b-roll film in tandem with the narr-
22 ation of, Plaintiff's book content. This video was captioned:

23 "INFORMATION FOR THIS VIDEO WAS OBTAINED FROM DRUG LORDS OF OAKLAND
24 BY TITUS LEE BARNES."

25 20. On or about May 24, 2025, Defendant, JOHN DOE, as the op-
26 erator/ account holder of the Evil Streets TV channel, on YouTube
27 did display a twenty-two minute and sixteen second video titled,
28 Meet Oakland's LEGENDARY KINGPIN Rudolph "Rudy" Henderson. During
the performance and display of this video, JOHN DOE [Operat-

1 or] narrated, plagiarized and reproduced Chapter 4 (Big Rudy) of
 2 Drug Lords of Oakland, while displaying photo's and running b-roll
 3 film footage in tandem with narration of Plaintiff's book content.
 4 This video was captioned: "INFORMATION FOR THIS VIDEO WAS OBTAINED
 5 FROM THE BOOK DRUG LORDS OF OAKLAND BY TITUS LEE BARNES." (TX 8-646-
 6 340, dated:09/05/18).

7 21. On or about May, 25, 2025, John Doe, as the account holder/op-
 8 erator of the Evil Streets TV, YouTube channel, did display a vid-
 9 eo titled Meet Oakland's LEGENDARY KINGPIN Darryl "Lil D" Reed.
 10 During the performance and display of this video, John Doe, narrat-
 11 ed, plagiarized and reproduced chapter 6 (Lil D), of Drug Lords of
 12 Oakland by Titus Lee Barnes, while displaying photo's and running
 13 b-roll film footage in tandem with narration of Plaintiff's book
 14 content.

15 22. On or about May 26, 2025, Plaintiff, sent YouTube, a Notice to
 16 Cease and Desist via U.S. Mail @ATTN: DMCA, 901 Cherry Avenue,
 17 San Bruno, Ca. 94066.

18 23. On or about May 28, 2025, Plaintiff, sent John Doe a Cease and
 19 Desist notice via email to Evilstreetsmedia@Gmail.com.

20 24. On or about May 28, Plaintiff sent YouTube a Notice to Cease
 21 and Desist via Report Legal Issue prompt on the Youtube platform.

22 25. On or about May 30, 2025, YouTube sent Plaintiff a response in
 23 the form of a email stating "The content listed below has been re-
 24 moved. Videos in question: <https://www.youtube.com/watch?> (1) v=DR-
 25 dkrASJBxy, (2) v=VZWN6HelvoE, (3) v=XJG9ZkElazU, (4) v=YJGVPl7U158,
 26 and; (5) v=tOS2WLDaAyg.

27 26. On or about June 1, 2025, John Doe, posted statement in his/her
 28 Evil Streets TV comments that were seditious, libelous and offens-

1 sive in nature.

2 27. On about June 5, 2025, Youtube sent Plaintiff, an email stating:

3 "At this point in the counter notification process you must
4 provide evidence that you've taken legal action against the
uploader to keep the content at issue from being reinstated to
YouTube."...

5 28. On or about June 6, 2025, John Doe sent Plaintiff a vulgar
6 Email in response to the Cease and Desist notice.

7 29. On or about June 16, 2025, YouTube, reinstated the video titled
8 Meet Oakland's LEGENDARY KINGPIN Darryl "Lil D" Reed.

9 30. On or about June 18, 2025, John Doe contested the Copyright
10 strike and asked for all five videos mentioned to be reinstated.

11 31. [A]t all times mentioned defendants actions, each and every
12 one of them was infringing and damaging.

13 32. Plaintiff has exhausted all administrative remedies.

14 CAUSE OF ACTION

15 VIOLATION OF 17 U.S.C. § 501.

16 F. COPYRIGHT INFRINGEMENT

17 33. Plaintiff, incorporates by reference and realleges as thorough-
18 ly set forth herein the paragraphs 1 through 32.

19 34. The actions of John Doe, directly and contributively infringed
20 upon the registered copyright of the Plaintiff and violated the
21 rights, privileges and immunities secured to Plaintiff, under the
22 Fifth Amendment to the Constitution of the United States. During
23 all times mentioned herein, the said Defendant(s) and each of them,
24 separately and in concert, acted illegitimately, creating a second-
25 ary market for Plaintiff's, "material" in the form of his copyright
26 and book Drug Lords of Oakland that facilitates the violation of
27 the terms of service thereof.

28 35. The actions of YouTube, and its inert efforts to thwart, stop,

1 derail and interdict, John Doe, from directly infringing upon the
2 Plaintiff's, copyrighted material in accordance with the customs,
3 regulations, priveleges and immunities secured to the Plaintiff by
4 the Fifth Amendment to the Cõnstitution of the United States, coal-
5 esced with an obvious and direct financial interest in the exploit-
6 ation of Plaintiff's copyrighted material.

7 36. Plaintiff is now suffering and will continue to suffer irrep-
8 able injury and monetary damages as a result of defendant's (each
9 and every one of them volitional conduct and infringing activity
10 unless and until this court grants relief.

11 SECOND CAUSE OF ACTION

12 17 U.S.C. § 502.

13 G. PRELIMINARY AND PERMANENT INJUNCTION

14 37. Plaintiff, incorporates by reference and realleges as thorough-
15 ly set forth herein the paragraphs 1 through 36.

16 38. The actions of John Doe, during the narraration, reproduction
17 and transmittal of Plaintiff's, private property, in the form of
18 legally copyrighted material, performed and displayed under the
19 course and scope and agency of defendant, Youtube, directly infrin-
20 ged on and violated the rights, priveleges and immunities secured
21 to Plaintiff, under the Fifth Amendment to the Cõnstitution of the
22 United States. During all times mentioned herein, the said defend-
23 ants and each and every one of them, seperately and in concert by
24 John Doe's failure to discontinue his/her own actions facilitated
25 third-party infringement,,attributable to YouTube which is in fact
26 contributory liability.

27 39. Plaintiff, has pursued a Judicial remedy with all deliberate
28 speed and desires a judgement at the earliest possible date.

1 40. Nevertheless, it appears that unless defendant(s) are restrain-
2 ed and provisionally enjoined, as plaintiff prays hereinafter, they
3 will take further action to enforce the adopted plan that will
4 cause irreparable harm to plaintiff, including monetarily and other-
5 wise.

6 41. The actions of YouTube, during the course, scope and agency of,
7 service providers for John Doe, with the right and ability to su-
8 pervise the infringing activity violated the rights, priveleges and
9 immunities secured to plaintiff, under the Fifth Amendment to the
10 Constitution of the United States.

11 42. Plaintiff is now suffering and will continue to suffer irrep-
12 arable injury and monetary damages as a result of defendant(s), each
13 and every one of them, and their volitional conduct and infringing
14 activity unless and until this court grants relief.

15 THIRD CAUSE OF ACTION

16 17 U.S.C. § 504.

17 H. DAMAGES AND PROFITS

18 43. Plaintiff, incorporates by reference and realleges as thorough-
19 set forth herein the paragraphs 1 through 42.

20 44. By reason of his/her conduct and actions, John Doe has caused
21 Plaintiff irreparable injury, monetarily and otherwise.

22 45. Therefore, Plaintiff is entitled to Judicial relief in the
23 underlying action as this court sees fit.

24 46. By reason of its conduct, Youtube has caused Plaintiff, irrep-
25 arable injury, monetarily and otherwise.

26 47. Therefore, Plaintiff is entitled to Judicial relief in the
27 underlying action as this court sees fit.

28 48. Plaintiff is now suffering and will continue to suffer irrep-

1 arable injury and monetary damages as a result of defendant(s), each
 2 and every one of them, and their volitional conduct of infringing
 3 activity unless and until this court grants relief.

4 5 I. PRAYER FOR RELIEF

6 WHEREFORE, Plaintiff requests that this court grant the following
 7 relief:

8 1. Declare that John Doe, violated Plaintiff's Fifth
 9 Amendment rights when he/she narrated, plagiarized and
 10 reproduced Plaintiff's copyrighted material and perform-
 11 ed, displayed and transmitted it on YouTube.

12 2. Declare that YouTube, violated Plaintiff's Fifth
 13 Amendment rights when they (a) exercised control over
 14 John Doe's content uploaded to their platform, and; (b)
 15 Had a direct and financial interest in those activities.

16 (Therefore, having vicarious liability of infringement on
 17 Plaintiff's copyrighted material.)

18 3. Declare that John Doe is in violation of Copyright In-
 19 fringement of Drug Lords of Oakland [TX 8-646-340];

20 4. Declare that YouTube, is in violation of Copyright
 21 Infringement of Drug Lords of Oakland [TX 8-646-340];

22 5. Plaintiff seeks a Preliminary and Permanent Injunct-
 23 ion under 17 U.S.C. § 502(a), and, 502(b);

24 6. Plaintiff seeks an award of actual damages of defendants
 25 (each and every one of them) Profits attributable to their
 26 alleged infringing activities, or, alternatively, statutory
 27 damages under 17 U.S.C. § 504., for the irreparable injury
 28 caused monetarily.

1 7. Attorney fees and costs of this suit herein;
2 8. For such other and further relief as the court may
3 deem proper.

4 Plaintiff requests a Trial

5 I SWEAR UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS
6 TRUE AND CORRECT ACCORDING TO MY KNOWLEDGE

7 Dated: June 28, 2025

8 Signed: Julian Barnes

9 Julian Barnes aka
10 Titus Lee Barnes
11 In Pro Se
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