

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.

NORFOLK SUPERIOR COURT

C.A. NO. 2382cv00881

TYLER MARTIN

Plaintiff

vs.

LIONEL FREDERIQUE TARGET

Defendant

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CLERK OF THE COURT
NORFOLK COUNTY

COMPLAINT

1. Plaintiff Tyler Martin is an individual resident of the State of Kansas.
2. Defendant Lionel Frederique Target is an individual residing in Quincy, Massachusetts.
3. This Court has personal jurisdiction over Target as he is domiciled in the Commonwealth of Massachusetts, and as Target committed tortious acts causing injury to the Martin while in the Commonwealth of Massachusetts.
4. Martin is a popular video game streamer and online personality, with approximately 90,000 YouTube subscribers and 138,000 followers on the streaming platform Twitch.
5. Martin also hosts a Discord server for users with similar interests. Discord servers permit members of online communities to communicate with one another.

6. Martin streams and creates content on the above-referenced online platforms under the pseudonym Xenosys Vex, and is widely known by that name and the shortened name "Xeno."
7. Members of the video game community associate Martin with the names Xenosys Vex and Xeno.
8. Martin's content primarily relates to the video game Final Fantasy XIV, a massive multiplayer online roleplaying game first released in 2013, in which users play as fantasy adventurers, taking on quests, interacting with other users, and seeking to gain experience and equipment that improve their abilities.
9. Target is an active user of YouTube, Twitch, and other online platforms, aspires to be a successful streamer and creator, and is an avid viewer of Martin's content.
10. Target has a YouTube channel (@Desolance), to which he has approximately 300 subscribers.
11. Of 33 publicly viewable videos on Target's YouTube channel, approximately half-- all published between June and August 2023-- mention Martin by name, pseudonym, or implication, and include defamatory, misleading, or false and disparaging statements about him.
12. Target has published an unknown number of additional videos and live videos which were originally posted to his public YouTube channel but have since been made private or removed.

13. Martin encountered Target among the Final Fantasy XIV community in or around 2017, when Target was a follower of Martin and a member of a Discord server operated by Martin.
14. In 2017, a dispute arose between Martin and Target.
15. The 2017 dispute was the result of Target causing the publication of private conversations with a close friend of Martin, Ember Lunalesca, in an attempt to embarrass Lunalesca and Martin.
16. Target appeared envious of Martin's relationship with Lunalesca and Target's public disclosure of the private conversation was intended as an act of revenge.
17. On September 8, 2017, Target explained to Martin his motivation for the disclosure: "also you should be the last person to call anyone a coward. you spoke to ember for weeks behind your girlfriends back all while telling her she had 0 reason to worry[.]"
18. Martin banned Target from his Discord server as a result of this disclosure.
19. In December 2017, after he was banned from Martin's Discord server, Target sent a message to Lunalesca disclosing his sexual obsession with her, which stated, in part:

I like you

I don't care if I need to wait a day, a week, a month, or however long

There is absolutely nothing on this earth that is going to stop me from eventually fucking he everliving daylights out of you

Unless you eventually come to the realization that that's something you don't want in which case we'd carry on as friends with absolutely no hard feelings

But

I want what I want

and what I want is you

I don't care how long I need to wait, because rest assured, I will fucking wait

[...]

There's no way I'd walk away from this just because you're uncomfortable with the thought of being intimate with me, especially since it's not due to my own actions, but because of shitty faggots that didn't deserve you in the past

I'll wait

And the wait is fine

Because unless you decide against it

The day I throw you on my bed

Rip your legs apart

and tear your pussy to shreds

with my 7.5+ inch dick

is going to be that much sweeter

because of the wait

Good night

20. On March 7, 2021, in a message ostensibly apologizing to Lunalesca, Target described acknowledged that he is often motivated by jealousy

and acknowledged that he had said false and “horrible” things to Lunalesca.

21. Between 2017 and 2023, Martin and Target had almost no direct communication or contact, but Martin grew his audience and both continued to be active in their online communities.
22. Beginning in 2023, Target published a series of YouTube videos in which he makes false, misleading, and/or defamatory statements about Martin.
23. For instance, on June 17, 2023, Target published a YouTube video, originally titled “Tyler Martin = Perverted Autistic Retard with Zero Integrity” (currently now titled, “HAHA!!! JESSICA VELLA WAS THROWN AWAY LIKE THE WORTHLESS PIECE OF SHIT THAT SHE IS!”), in which he falsely claims that Martin cheated on a previous girlfriend, who goes by the username NeomiZero, and that Martin told NeomiZero to kill herself.
24. The URL for the video referenced in the preceding paragraph is https://www.youtube.com/watch?v=vT3y6jWr_n4&ab_channel=Desolance.
25. Martin did not cheat on NeomiZero nor tell her to kill herself.
26. On June 29, 2023, Target posted a video to his YouTube channel, originally titled “HOW XENO FLIRTS WITH WOMEN 16 YEARS YOUNGER THAN HIM” (at the time of filing this Complaint, the title has been changed to “I’VE GOT A BIG OL BONER- ONE SEC. YO YO YO AXEKID85 THANKS FOR THE RESUB”) in which he falsely claims that

Martin behaved inappropriately toward a 22-year-old female streamer and, as a result, was forced to leave her Discord chat server.

27. The URL for the video referenced in the preceding paragraph is:
https://www.youtube.com/watch?v=ZJQJKsuFY5k&ab_channel=Desolance.
28. Target's disposition toward Ember also evidently changed between his March 2021 apology and the June 29, 2023 video referenced above, as he is again clear about his motives for defaming and attempting to damage Martin's reputation: "Honestly this guy . . . maybe if I would have employed some of these techniques it would have been me and not Tyler Martin who saw Ember Lunalesca's asshole in 2017. I'm very very very angry about that still. I can't believe that I didn't get to see her pussy I really want to know what it looks like and Xeno is right when he says that's the only thing I'm jealous of."
29. In a since-deleted or privatized video titled "Watch me laugh at Xeno's shameless hypocrisy," at the URL <https://youtu.be/wZywurtsetw?t=2183>, published in July 2023, Target again falsely claims that Martin told Neomi Zero to kill herself after cheating on her.
30. Also, in the video described in the preceding paragraph, Target admits that he regularly changes the titles of his videos in order to evade YouTube's automated removal tools for defamation and/or violation of privacy.

31. On July 24, 2023, Target posted a video to YouTube, titled “Dead Eerie Silence (At Long Last),” at the URL https://www.youtube.com/watch?v=8k1MaHbL-2g&ab_channel=Desolance, in which he falsely accuses Martin of sexually grooming an underage girl.
32. Specifically, in the video identified in the preceding paragraph, Target falsely claims that Martin made sexual innuendo toward another Twitch user named Spudsy when she was 17 in order to begin a sexual relationship with her after she turned 18.
33. Target claims that Martin aided Spudsy in advancing her streaming audience because, in Target’s words, “she has what it takes to suck his fucking cock,” and that “the reason why he is platforming Spudsy because he wants to know what her pussy looks like” (in reference to the now-18-year-old woman he purports to be protecting from “grooming”).
34. Martin did not pursue such a relationship with Spudsy when she was 17.
35. In another since-deleted or privatized video titled, “LLAMATODD GOT HIS ASS BEAT LIVE + ANIME DISCUSSION,” at the URL <https://www.youtube.com/watch?v=eyLo8m03Hps>, Target repeats his false claim that Martin told Neomi Zero to kill herself.
36. In a since-deleted or privatized YouTube video posted on July 28, 2023, titled “Ladies and Gentlemen- Undiagnosed Autism,” Target claimed that Martin is a “pedophile,” and accused Martin of trading child pornography with another individual.

37. Martin is not a pedophile and has never possessed or traded child pornography.
38. In a second video posted on July 28, 2023, titled "TIME MAGE THEORY (HIS MAGESTY KNOWS ALL" (currently titled "TIME MAGE N THIEF"), Target again asserted, falsely, "the fact that LlamaTodd and Xeno are trading child porn."
39. In a since-deleted or privatized video posted on August 3, 2023, at the URL <https://www.youtube.com/watch?v=QIo-M68r2cg>, Target repeated his false accusations that Martin is a pedophile.
40. In a still-active YouTube video posted on August 12, 2023, titled "Disturbing Deep Dive into Tyler Martin's Commune of Racist Pedophiles," wherein Target refers to a Middle Eastern man as a "mongoloid," he again accuses Martin of being a pedophile, makes reference to Martin's "toothless, drug-addicted mom," and states he wishes that Martin's mother and other female targets of his ire would be assaulted.
41. In the video referenced in the preceding paragraph, Target makes numerous false and disparaging comments alleging that Martin's friends and supporters are pedophiles, child pornographers, racists, in a further effort to damage Martin's reputation and means of support.
42. As the direct and proximate result of Targets' false and defamatory statements, Martin has sustained reputational damage, been the subject of shame, scorn, and opprobrium in his community, has suffered

emotional distress, and has suffered loss of business opportunity and income.

COUNT I – DEFAMATION

43. Martin incorporates by reference each preceding allegation as if fully set forth herein.
44. Target's false statements, among other things, falsely accuse Martin, by his name or by his nom de guerre Xenosys Vex, of pedophilia and child pornography, of cheating on a partner and telling her to kill herself, and of grooming a minor and other sexually predatory behavior ("False Statements").
45. The False Statements are unequivocally false and defamatory.
46. The False Statements are of and concerning the Martin.
47. Target's publication of the False Statements tends to subject, and in fact has subjected, Martin to ridicule, contempt, scorn, and hatred, and has caused harm to Martin's reputation.
48. The False Statements also tend to injure, and have injured, Martin in his business or profession.
49. Target authored, recorded, and published the False Statements about Martin without privilege or authorization.
50. Because the False Statements expose Martin to ridicule, contempt, scorn, and hatred, allege that Martin engaged in criminal activity including sexual predation against minors, child pornography, and by their nature prejudice Martin in the conduct of his business or profession, the False Statements, in whole or in part, constitute defamation per se.

51. Target acted with malice in creating and publishing his False Statements because Target knew the statements and impressions created by those statements were false, and/or acted with negligent and/or reckless disregard as to the truth or falsity of those statements.
52. Upon information and belief, the false statements have been seen by individuals throughout the Commonwealth of Massachusetts and the United States.
53. As a direct, proximate, and natural result of Target's False Statements, Martin has suffered irreparable reputational harm and mental suffering, and has sustained damages including, but not limited to, loss of capital and revenue, lost productivity, mitigation expenses, and loss of good will and intangible assets in an amount that will be proven at trial.
54. Martin is entitled to compensatory damages in an amount to be proven at trial.
55. In addition, Martin requests a permanent injunction ordering Target to remove the False Statements and halting the continued publication of additional false statements, ordering YouTube to remove the False Statements, and Google, Bing, Yahoo, and other search providers to remove results linking to the false statements. Without the requested injunctive relief, Target's False Statements will continue to cause great and irreparable injury to the Martin, and Martin has no adequate remedy at law for the damages that he is currently suffering and is likely to continue to suffer as a result of Target's conduct.

**COUNT TWO – INTENTIONAL INFLICTION OF EMOTIONAL
DISTRESS**

56. Martin restates and incorporates by reference each of the preceding paragraphs as if fully set forth herein.
57. Target's pervasive and repeated harassment of Martin and publication of false, defamatory, disparaging material including statements which accuse Martin falsely of sexual misconduct, child pornography and pedophilia, and abusive behavior toward a former romantic partner, is extreme and outrageous conduct, such that it goes beyond all bounds of decency and is utterly intolerable in a civilized community.
58. Target's harassment and publication of false, defamatory, and disparaging material was done intentionally for the purpose of causing the Martin emotional distress, and Target knew or should have known that his conduct was likely to result in emotional distress.
59. As a direct and proximate result of Target's conduct, Martin has suffered severe emotional distress including mental anguish, humiliation, lost sleep, loss of productivity, and loss of earning capacity.
60. Due to the harm suffered by Martin and Target's extreme, outrageous, and intentional conduct motivated by hatred, malice, and envy, Martin is entitled to compensatory and punitive damages in an amount to be proven at trial.

WHEREFORE, Martin prays that judgment be entered in his favor against Target as follows:

- A. Compensatory damages in an amount to be determined at trial;

- B. Punitive damages in an amount sufficient to deter Target and others from similar conduct in the future;
- C. Issuance of an Order by this Court decreeing that Target's false statements and false implications are false and defamatory;
- D. Injunctive relief that Target is:
 - i. Prohibited from creating or publishing statements about Martin, his employees, agents, business partners, representatives, or services which defame, disparage, or contain libelous statements of and concerning the same;
 - ii. Ordered to take all actions necessary to remove the subject content and the statements contained therein from the Internet, including but not limited to, requesting removal of the content from any platform, website, or other medium on which they are published and from Internet search engines, including Google, Yahoo!, and Bing; and
 - iii. Ordered to refrain from further acts of impersonation, fraud, or unfair business practices against Martins.
- B. Pre- and post-litigation interest at the maximum rate provided by law;
- C. Reasonable attorneys' fees and costs of this litigation; and
- D. Any and all other relief to which the Court determines to which Martin is entitled.

PLAINTIFF DEMANDS TRIAL BY JURY

Respectfully Submitted,

Plaintiff,
By Its Attorneys,

Law Offices Beauregard, Burke & Franco

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