

Docketed 2/28/24

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.

NORFOLK SUPERIOR COURT

C.A. NO. 2382CV00881

TYLER MARTIN

Plaintiff

vs.

LIONEL FREDERIQUE TARGET

Defendant

March 4, 2024

Off to issue Ret.  
March 13, 2024 at 2:00 PM: hearing  
to be held by Zoom.  
Zoom information is: 160 489 5466  
(no password) (Leighton, J.)  
Att: Mr. K. Idubry  
and 4 others

**PLAINTIFF'S EMERGENCY EX PARTE MOTION FOR TEMPORARY  
RESTRAINING ORDERS**

Now comes Plaintiff Tyler Martin (hereinafter "Plaintiff"), by and through counsel,  
hereby submits this Emergency Motion for Temporary Restraining Orders pursuant to  
Mass. R. Civ. P. 65.

1. As set forth more fully herein, and as supported by facts set forth in the Affidavit of Tyler Martin, attached hereto as Exhibit A, Plaintiff is entitled to a Temporary Restraining order against Defendant, Lionel Frederique Target (hereinafter "Defendant").
2. On or about February 20, 2024, Defendant published Plaintiff's residence address and photos of his home in at least one public Discord server with the caption, "Check out Xenosys Vex's house! This is Tyler Martin's house & address. Pretty neat!"
3. Shortly after publishing Plaintiff's residence address and photos of his home publicly on Discord, Defendant began sending Plaintiff a series of threatening direct Discord messages which contained, among many other things, threats to

motion denied after hearing. The motion with its attachment does not meet the high standard required to overcome the "heavy presumption against its constitutionality." See Shel v. Stok 484 Mass 658 (2020), Leighton, J.

“slit [Affiant’s] throat,” “gut [Affiant] like a fucking fish,” and to “break into [Affiant’s] room and spend 20 minutes stabbing [Affiant] to death,” and stated that Defendant would “rather bash [Affiant’s] mothers skull into mush.”

4. Plaintiff submits that, unless enjoined by order of this Court, Defendant will continue to threaten, harass and/or abuse Plaintiff, and that Plaintiff will suffer irreparable harm, for which he has no adequate remedy at law.
5. Plaintiff submits unless enjoined by order of this Court, Defendant will continue to threaten, harass and abuse Plaintiff via Discord, for which he has no adequate remedy at law,
6. Plaintiff submits unless enjoined by order of this Court, Defendant will continue to post images of Plaintiff’s home and personal address on Discord and/or like social media sites, and that he will suffer irreparable harm for which he has no adequate remedy at law.
7. Plaintiff further requests that the Court specifically waive the requirement of Rule 65(c) of the Massachusetts Rules of Civil Procedure since Defendant will not incur costs or damages as a result of being enjoined from threatening, harassing, abusing or doxing the Plaintiff;
8. Plaintiff submits that he understands that the temporary restraining order expires in ten (10) days and will not be extended unless during that 10-day period, good cause is shown to the Court or the party(s) against whom the order(s) is made consents to an extension.

WHEREFORE, Plaintiff respectfully prays for relief in the following manner:

1. Judgment granting him *ex parte* restraining orders enjoining Defendant from threatening, harassing or abusing Plaintiff;

2. Judgment granting him *ex parte* restraining orders enjoining Defendant from threatening, harassing or abusing Plaintiff on any social media site in particular, Discord;
3. Judgment granting him *ex parte* restraining orders enjoining Defendant from posting images of Plaintiff's home and personal address on any social media site, in particular, Discord;
4. Judgment granting him *ex parte* restraining orders enjoining Defendant from publishing any personal information pertaining to the Plaintiff's residence;
5. Judgment ordering Defendant to remove any and all posts disclosing the Plaintiff's personal home address;
6. Judgment waiving the requirement of Rule 65(c) of the Massachusetts Rules of Civil Procedure that Plaintiff provide security for the issuance of the abuse Order(s);
7. Judgment granting him such other relief as this Court deems fair, just and equitable, including but not limited to, costs of these proceedings.

Respectfully submitted,

The Plaintiff

By his Attorneys,  
Law Offices of Beauregard, Burke & Franco

/s/Adrienne Catherine H. Beauregard-Rheaume  
Adrienne Catherine H. Beauregard-Rheaume  
BBO #678889  
32 William Street  
New Bedford, MA 02740  
Tel. No. 508-993-0333  
[abeauregard@bbflawoffices.com](mailto:abeauregard@bbflawoffices.com)

Dated: February 23, 2024

# Exhibit A

STATE OF Kansas )  
 )  
 )  
COUNTY OF Sedgewick )

ss. **AFFIDAVIT IN SUPPORT  
OF RESTRAINING ORDERS**

Affiant, Tyler Martin, being first duly sworn, deposes and says that he is the Plaintiff in the within action, that the Defendant, Lionel Target ("Defendant"), has threatened his life and has posted Plaintiff's residential address and photos of Plaintiff's home to Discord, all of which has put him in fear of his safety and that unless Defendant is enjoined from continuing such conduct, he will suffer irreparable damage for which he has no adequate remedy at law.

Affiant further states that on or around February 20, 2024, he discovered that Defendant (using the username "The Mystic", "midnight\_daydreaming"), publicly posted Affiant's residence address and photos of his home to a public Discord server. A true and correct copy of Defendant's post publicly identifying Affiant's home address is attached hereto as Exhibit 1.

Affiant also discovered that Defendant posted a series of death threats against Affiant in Discord. For example, Defendant threatened to "slit [Affiant's] throat," "gut [Affiant] like a fucking fish," and to "break into [Affiant's] room and spend 20 minutes stabbing [Affiant] to death," and stated that Defendant would "rather bash [Affiant's] mother's skull into mush." Defendant also threatened to "stab [Affiant's] eyes out" and "rip [Affiant's] teeth out with pliers." A true and correct copy of the threatening messages sent by Defendant to Affiant is attached as Exhibit 2.

Affiant further states that, amidst Defendant's threats to assault and kill him, Defendant posted 13 images of his personal residence and address.

Such posts place Affiant in fear for his life because, unlike the statements that form the basis for this lawsuit, which primarily were indirect threats and false statements about Affiant, Defendant has now directly and explicitly threatened Affiant's life, including specific threats that he will enter Affiant's home while Affiant sleeps and stab him to death, and has attempted to incite his online followers by publishing Affiant's residence address and photos of Affiant's home publicly along with those threats.

Affiant believes that Defendant is capable of harming him because Defendant has made these threats explicitly in response to Affiant's legal action against him, rather than defending himself in this matter, stating "If I receive another letter from your lawyer, I will kill you. If you attempt to rob money from me for telling the truth I will kill you. I will deliver you your father's severed head[.] Years of harassment [.,] You had your faggot fan write me a fake version of your lawsuit with slanderous lies 'restraining order' and then you cry about being doxxed you really do deserve to die. . . . 1. You will not receive a cent 2. You *literally* will die before you would receive a cent." The hearing on damages and injunctive relief in this matter is scheduled in a matter of weeks, and Defendant has clearly expressed his refusal to accept responsibility for his conduct and instead has threatened to kill Affiant if this Court grants the requested relief.

WHEREFORE, this Affiant respectfully requests that this court issue *ex parte* restraining orders consistent with this Affidavit.

FURTHER AFFIANT SAYETH NAUGHT.

Signed and sworn to under the pains and penalties of perjury this 22<sup>nd</sup> day of February, 2024, before Public Notary


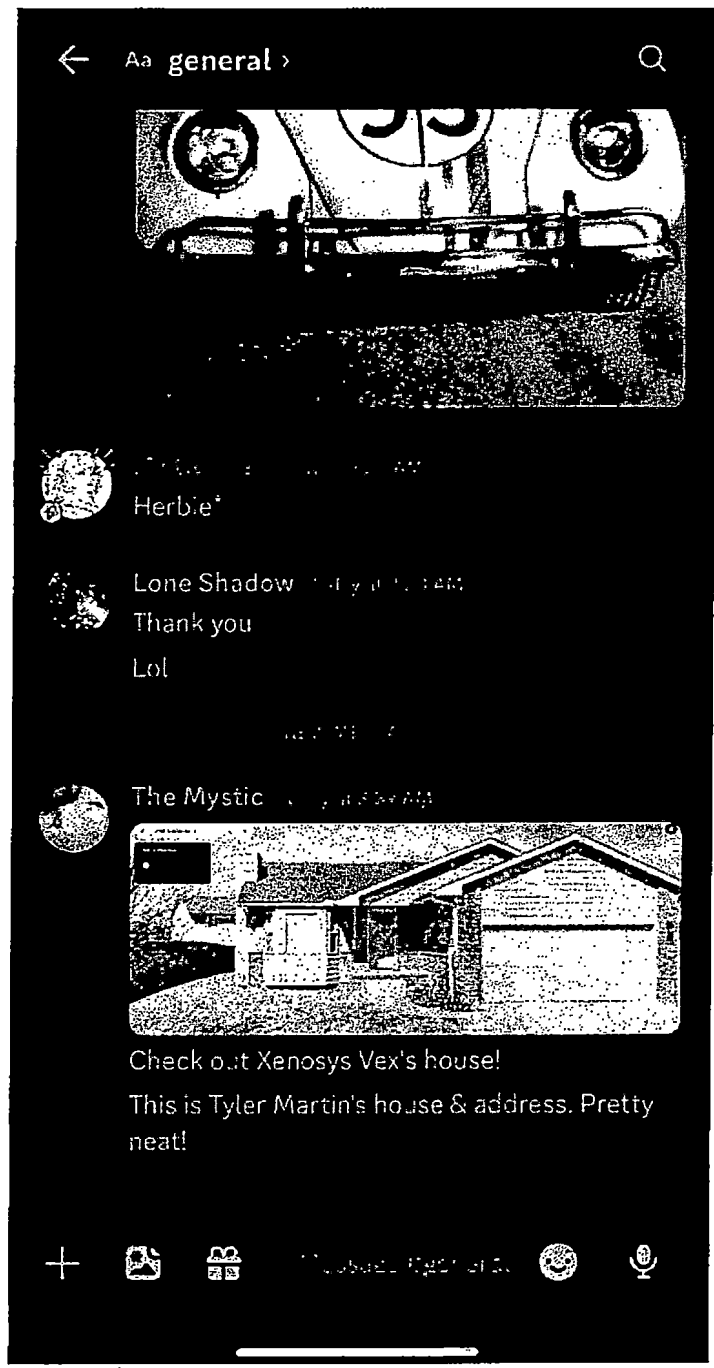
  
\_\_\_\_\_  
Tyler Martin  
1342 N. Aksarben Ct  
Wichita, KS 67235






EXHIBIT 1









## EXHIBIT 2

The Mystic



Search







### The Mystic


midnight\_daydreaming


This is the beginning of your direct message history with The Mystic.

No servers in common

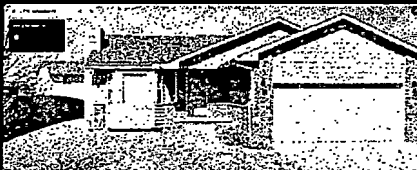
Add Friend

Block

Report Spam

The Mystic 1 day and 11 min

Slit your throat, you worthless, autistic, white trash piece of shit.



Fat down syndrome faggot. I'm so glad Mark Miller died with bullets lodged in his neck.

I hope to god you die the same way, you worthless fuck.

I'd rather bash your mothers skull into mush

before you see a cent (:

You pathetic, perverted faggot.

Worthless fuck. I own you.

I will own you for the rest of your life

while you pray your farbase doesn't discover your lawsuit

Be glad Mark Miller died before he got to see you embarrass yourself like the retarded redneck you are

Worthless, autistic psychopathic piece of shit.

Having your fat faggot obsessive fans write me a FAKE lawsuit? In which you attempt to dox myself & your ex-girlfriend?

And then you cry about your address being publicly available to view online? Scared of your freak retard fans finding it?

Xenosys Vex

if your fans continue to harass me

if your fans continue to harass me  
I will gut you like a fucking fish  
You fat  
retarded  
down syndrome  
Low IQ  
Worthless waste of space  
I will stab your eyes out  
and rip your teeth out with pliers  
you stupid  
worthless  
fucking redneck  
Mark Miller is dead  
Todd Beasley had a stroke - he's going to die  
You're a dumb, dirty, down syndrome autist that groomed a 17 y/o girl he met via twitch  
you thought you could bully me and you got fucking dog walked  
I own you.  
I'll rape & murder your mother  
Before you receive a cent.  
I'll kill you  
and your roommate  
before you receive a cent  
I will gladly forgo my existence on this earth to bash your worthless skull open  
I will break into your room while you're asleep  
and spend 20 minutes stabbing you to death  
If your fans continue to harass me  
I will kill you.  
If your fans continue to harass me.  
I will kill you.  
If your fans continue to harass me  
I will kill you.

If your fans continue to harass me  
I will kill you.

If your fans continue to harass me  
I will kill you.

If your fans continue to harass me  
I will kill you.

The Mystic pinned a message to this channel. See all pinned messages.



The Mystic is gay and a faggot

If I receive another letter from your lawyer, I will kill you.



The Mystic pinned a message to this channel. See all pinned messages.



The Mystic is gay and a faggot

If you attempt to rob money from me for telling the truth  
I will kill you.

I will deliver you your father's severed head

Years of harassment

You had your faggot fan write me a fake version of your lawsuit

with slanderous lies

"restraining order"

and then you cry

about being doxxed

you really do deserve to die

You worthless, gutless, fat faggot pathetic perverted groomer retard

I'm going to live a long and happy life

I'm not setting foot in a prison

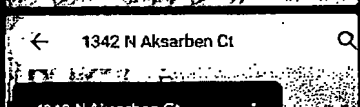
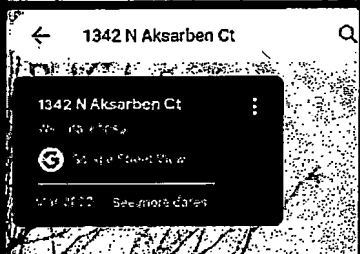
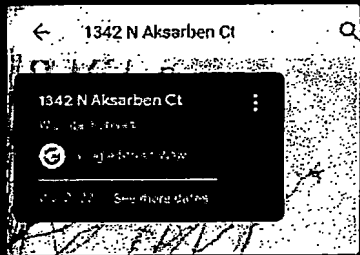
but if you try to harass me

to scam me out of money

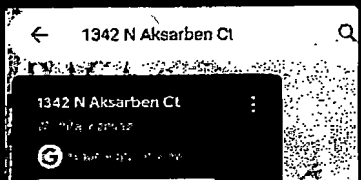
to lie about me

if you have your fans

to scam me out of money  
to lie about me  
if you have your fans  
harass me  
I'll  
just  
you  
Do. Not. Send. Letters. To. My. House.  
I.  
Will.  
You.



Down syndrome worthless faggot  
Fucking fat redneck talked shit in a discord  
got the shit beaten out of him  
cried to a lawyer because he knows he's an autistic retard that'll lose all his money the split second the truth is acknowledged  
You saw me force Zep to tell bold faced lies  
you watched me stuff my cock down everyone's throat  
thought you were different, found out you weren't  
& you cried to a lawyer. For no reason  
"I didn't cheat on Neomi Zero"  
Slit your throat. You won't get her to lie for you  
Fat fucking retard  
1. You will not receive a cent  
2. You *literally* will die before you would receive a cent.  
You have two options  
neither gives you money  
I would rather gouge your eyes out with a brillo pad  
than give you a dime



Not exactly a maximum security operation you've got going here, you fucking retard hills-have-eyes-inbred psychopath  
If your fans harass me  
I will break into your bedroom and stab you in the throat for every single message sent  
If I receive a single comment  
From any of your fans  
I will  
see you  
at 7 am



Leave.  
Me  
Alone  
Or,  
Die



The Mystic 1 14 2024

You will not ever have a single ounce of control over me. I am your god.

I am smarter than you.

I am bigger than you.

I am better than you.

& I always will be

You couldn't get over a tweet from 2017, you'll never get over the fact that I kicked your teeth in in front of your entire fanbase  
and you'll never get over the fact that you need to keep this lawsuit hidden

You are a fat psychopathic piece of shit

that has his retard fanbase harass people ad nauseum

I have dealt

with your psychotic

fat

fucking faggot

white trash retard

non-black

worthless piece of shit fanbase

for years

I

will

obliterate

your mother

Leave.

Me.

Alone.

Or.

You worthless, retarded piece of shit.

Thank

God

Mark

Miller

Died.

Slow.

I thank

GOD

Todd Bessley

is going to die

within 10 years

Thank GOD Poohajutsu died

and I hope to god

you join them soon

I won't lay a finger on you

but seriously

if you ever attempt to misuse the american justice system ever again

I'll beat you

Your bedroom will turn into Gaza in less than 10 seconds

I could beat you to death



"He's stuck in heavensward"

"Hes' racist to black people, uses n-bombs"

"Ember's vagina"

I

will

slit

your

throat

if

you

or any

of your retard fans

leave

a single comment

on my channel



