

Docketed 12/5/2023

6.1

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.

NORFOLK SUPERIOR COURT
C.A. NO. 2382CV00881

TYLER MARTIN

Plaintiff

vs.

LIONEL FREDERIQUE TARGET

Defendant

**AFFIDAVIT OF TYLER MARTIN IN SUPPORT OF
MOTION FOR DEFAULT JUDGMENT**

I, Tyler Martin, being first duly sworn, depose and state as follows:

1. I am an individual over the age of 18 residing in the State of Kansas.
2. The facts set forth herein are stated from my personal knowledge, and if called as a witness I could and would testify competently as to the same.
3. I earn my living as a content creator and live streamer of video game-related content, primarily concerning the popular game Final Fantasy XIV.
4. At present, I have approximately 140,000 followers of my Twitch account, including approximately 4,000 subscribers, who pay a monthly fee for access to subscription-based content.
5. I also operate a YouTube channel with approximately 92,000 followers, and host a Discord server, which members can use to communicate directly with one another.
6. I use the name Xenosys Vex on the foregoing platforms, and I am identifiable by that name and "Xeno."

7. I became aware of Defendant Lionel Target in or around 2017, when Target publicized private conversations online in an attempt to embarrass me and my friend, Jessica Vella (who uses the pseudonym Ember), which resulted in my banning him from my Discord server.
8. In December 2017, Target sent a written message to Jessica admitting that the reason for his behavior that he was sexually obsessed with her.
9. In March 2021, Target sent a written message to Jessica apologizing for his behavior and explained that his 2017 behavior toward Jessica and me was motivated by spite and jealousy.
10. After banning Target from my Discord server, I had minimal communication or interaction with him.
11. Beginning in early 2023, Target began publishing videos about me on YouTube, in which he makes repeated false and defamatory accusations about me, including claiming falsely that I cheated on and abused a woman I had been in a relationship with and characterizing me as an abuser, sexual predator, and pedophile.
12. I became aware of Target's publication of defamatory statements about me in or around May 2023, but I did not recognize the extent and severity of his obsessive and persistent publication until mid-to-late June 2023.
13. On June 17, 2023, Target published a YouTube video in which he states about me that I "was dating Neomi Zero before he was dating Ember and the day before she flew out to meet him, he broke up with her because he had already been cheating on her with Ember and he decided he wanted to have sex with this person instead. He capped that one off by telling Neomi Zero to kill herself a month later."

14. In the same video, Target repeated, “Xeno told a woman he cheated on to kill herself and that he’s the only reason she has any friends.”
15. I did not cheat on Neomi Zero and did not tell her to kill herself.
16. On June 27, 2023, in a video explaining to his audience how to evade YouTube’s harassment filters, he demonstrated changing the name of a video to “TYLER MARTIN TOLD NEOMI ZERO TO KILL HERSELF AFTER CHEATING.”
17. On June 29, 2023, Target published a video in which he replayed a joking interaction I had with a 23-year-old female Twitch streamer, ItsMayme, and asserted that I engaged in sexually predatory behavior toward her and was banned from her Discord server as a result.
18. I did not ever engage in predatory behavior toward ItsMayme and was not banned from her Discord server as a result.
19. Following Target’s identification of ItsMayme in his June 29, 2023 video—purportedly under the guise of “protecting her”—ItsMayme was inundated with dozens of harassing messages from individuals repeating Target’s false accusations against me and using abusive language against ItsMayme if she did not respond.
20. On June 30, 2023, Target published a video in which he repeated the false statement that I cheated on Neomi Zero and told her to kill herself.
21. On July 24, 2023, Target published a video in which he accused me of interacting with a 17-year-old female follower for the purpose of grooming her sexually, claiming that “the only reason Xeno is platforming Spudsy is because he wants to know what her pussy looks like.” Target referred to me as a “pedophile” in that same video.

22. In two different videos published on July 28, 2023, Target claimed that I am a “pedophile” and accused me of “trading child porn” with a friend of mine.
23. On August 12, 2023, Target published a video titled “Disturbing Deep Dive into Tyler Martin’s Commune of Racist Pedophiles,” wherein he repeats the false claim that I am a “pedophile.”
24. In a post to 4Chan dated September 28, 2023, Target again repeated the false accusation that I am a “pedophile” who will “die in prison.”
25. On October 11, 2023, after receiving service of the Complaint and Summons in this matter, Target published a video in which he reads and comments on portions of the Complaint. The description of that video falsely claims that I am an “ephebophile,” falsely claims that I was sexually abused by my father, and falsely claims that I am “[m]essin’ with adolescent kids? Just like he did to you?”
26. In all, Defendant has published at least 50 YouTube videos falsely claiming or implying that I am an abuser, a pedophile, a child pornographer, a groomer, and a sexual predator.
27. Target has published such videos, from June 4, 2023 through at least November 5, 2023, at the following URLs, some of which have been made private after they were initially published:
 - a. https://www.youtube.com/watch?v=ZJQJKsuFY5k&ab_channel=Desolance;
 - b. <https://www.youtube.com/watch?v=2oO8zzovPWQ>;
 - c. <https://www.youtube.com/watch?v=wZywurtsetw>;
 - d. https://www.youtube.com/watch?v=vT3y6jWr_n4&ab_channel=Desolance;

- e. https://www.youtube.com/watch?v=7yj2LR2AqSQ&ab_channel=Desolance;
- f. https://www.youtube.com/watch?v=LQLuiBlEvsY&ab_channel=Desolance;
- g. https://www.youtube.com/watch?v=3vizMJnFxoU&ab_channel=Desolance;
- h. https://www.youtube.com/watch?v=WIKwHRbeCLI&ab_channel=Desolance;
- i. [https://www.youtube.com/watch?v=ihDYBpIlbqw](https://www.youtube.com/watch?v=ihDYBpIlbqw;);
- j. https://www.youtube.com/watch?v=kQEaaNnzV4&ab_channel=Desolance;
- k. [https://www.youtube.com/watch?v=TCob7BnQAfI](https://www.youtube.com/watch?v=TCob7BnQAfI;);
- l. [https://www.youtube.com/watch?v=lxwvc-7bbHs](https://www.youtube.com/watch?v=lxwvc-7bbHs;);
- m. https://www.youtube.com/watch?v=yyIGcQlRGo&ab_channel=Desolance;
- n. [https://www.youtube.com/watch?v=7ySYZrSOlhw](https://www.youtube.com/watch?v=7ySYZrSOlhw;);
- o. https://www.youtube.com/watch?v=Og2YMdXnawg&ab_channel=Desolance;
- p. [https://www.youtube.com/watch?v=7ySYZrSOlhw](https://www.youtube.com/watch?v=7ySYZrSOlhw;);
- q. https://www.youtube.com/watch?v=8k1MaHbL-2g&ab_channel=Desolance;
- r. https://www.youtube.com/watch?v=dsDetxrjOfw&ab_channel=Desolance;

- s. [https://www.youtube.com/watch?v=F-bAYIraIoQ&ab_channel=Desolance;](https://www.youtube.com/watch?v=F-bAYIraIoQ&ab_channel=Desolance)
- t. [https://www.youtube.com/watch?v=pjjG6xJAEFY;](https://www.youtube.com/watch?v=pjjG6xJAEFY)
- u. [https://www.youtube.com/watch?v=24F7CxpU8jo&ab_channel=Desolance;](https://www.youtube.com/watch?v=24F7CxpU8jo&ab_channel=Desolance)
- v. [https://www.youtube.com/watch?v=QIo-M68r2cg;](https://www.youtube.com/watch?v=QIo-M68r2cg)
- w. [https://www.youtube.com/watch?v=3bbR2YgJ9Ao&ab_channel=Desolance;](https://www.youtube.com/watch?v=3bbR2YgJ9Ao&ab_channel=Desolance)
- x. [https://www.youtube.com/watch?v=Ir3xcpbViEk&ab_channel=Desolance;](https://www.youtube.com/watch?v=Ir3xcpbViEk&ab_channel=Desolance)
- y. [https://www.youtube.com/watch?v=Ir3xcpbViEk&ab_channel=Desolance;](https://www.youtube.com/watch?v=Ir3xcpbViEk&ab_channel=Desolance)
- z. [https://www.youtube.com/watch?v=3bbR2YgJ9Ao&ab_channel=Desolance;](https://www.youtube.com/watch?v=3bbR2YgJ9Ao&ab_channel=Desolance)
- aa. [https://www.youtube.com/watch?v=KLytwY9O1XO;](https://www.youtube.com/watch?v=KLytwY9O1XO)
- bb. [https://www.youtube.com/watch?v=li9ZKeoK6s&ab_channel=Desolance;](https://www.youtube.com/watch?v=li9ZKeoK6s&ab_channel=Desolance)
- cc. [https://www.youtube.com/watch?v=UoBNVda8leo&ab_channel=Desolance;](https://www.youtube.com/watch?v=UoBNVda8leo&ab_channel=Desolance)
- dd. [https://www.youtube.com/watch?v=Wol297NFEfA&ab_channel=Desolance;](https://www.youtube.com/watch?v=Wol297NFEfA&ab_channel=Desolance)
- ee. [https://www.youtube.com/watch?v=Di-BTS4N9so&ab_channel=Desolance;](https://www.youtube.com/watch?v=Di-BTS4N9so&ab_channel=Desolance)

- ff. [https://www.youtube.com/watch?v=WP3JKfxlQXU&ab_channel=Desolance;](https://www.youtube.com/watch?v=WP3JKfxlQXU&ab_channel=Desolance)
- gg. [https://www.youtube.com/watch?v=xzE7cPPNZro&ab_channel=Desolance;](https://www.youtube.com/watch?v=xzE7cPPNZro&ab_channel=Desolance)
- hh. [https://www.youtube.com/watch?v=oC8yg09TY3M&ab_channel=Desolance;](https://www.youtube.com/watch?v=oC8yg09TY3M&ab_channel=Desolance)
- ii. [https://www.youtube.com/watch?v=JXnTl4BR1mE&ab_channel=Desolance;](https://www.youtube.com/watch?v=JXnTl4BR1mE&ab_channel=Desolance)
- jj. [https://www.youtube.com/watch?v=rNIS1_ym6Ac&ab_channel=Desolance;](https://www.youtube.com/watch?v=rNIS1_ym6Ac&ab_channel=Desolance)
- kk. [https://www.youtube.com/watch?v=bU7PUfXw_yU&ab_channel=Desolance;](https://www.youtube.com/watch?v=bU7PUfXw_yU&ab_channel=Desolance)
- ll. [https://www.youtube.com/watch?v=k6iR4EwKZBI&ab_channel=Desolance;](https://www.youtube.com/watch?v=k6iR4EwKZBI&ab_channel=Desolance)
- mm. [https://www.youtube.com/watch?v=W09RF2M2oIs&ab_channel=Desolance;](https://www.youtube.com/watch?v=W09RF2M2oIs&ab_channel=Desolance)
- nn. [https://www.youtube.com/watch?v=gcZzXCGtnEA&ab_channel=Desolance;](https://www.youtube.com/watch?v=gcZzXCGtnEA&ab_channel=Desolance)
- oo. [https://www.youtube.com/watch?v=VxY2ozthCrs&ab_channel=Desolance;](https://www.youtube.com/watch?v=VxY2ozthCrs&ab_channel=Desolance)
- pp. https://www.youtube.com/watch?v=Hu86_XpKUuI;
- qq. [https://www.youtube.com/watch?v=E5hTGr5iKRO&ab_channel=Desolance;](https://www.youtube.com/watch?v=E5hTGr5iKRO&ab_channel=Desolance)

- rr. https://www.youtube.com/watch?v=3vF84jGkuZM&ab_channel=Desolance;
- ss. [https://www.youtube.com/watch?v=KaE_FbrbbBo](https://www.youtube.com/watch?v=KaE_FbrbbBo;);
- tt. https://www.youtube.com/watch?v=-oifj_5vBxM&ab_channel=Desolance;
- uu. https://www.youtube.com/watch?v=pdCStNIX6K4&ab_channel=Desolance;
- vv. https://www.youtube.com/watch?v=r9n3X_k9QAU&ab_channel=Desolance;
- ww. https://www.youtube.com/watch?v=yAfU6bBao-A&ab_channel=Desolance;
- xx. https://www.youtube.com/watch?v=i-BjOo-1Y2A&ab_channel=Desolance;
- yy. https://www.youtube.com/watch?v=cVlIEjASacU&ab_channel=Desolance;
- zz. https://www.youtube.com/watch?v=sSis8mSivWY&ab_channel=Desolance; and
- aaa. https://www.youtube.com/watch?v=gQHwvnx1w&ab_channel=Desolance.

- 28. The videos at the URLs listed in subparagraphs hh. through aaa. above were published after the Complaint in this matter was filed.
- 29. In a video published on August 1, 2023, Target makes clear that his purpose in publishing this material about me is purely motivated by revenge and spite, stating: "Something I really need to iterate is that this shit is not my battle. I don't

give a fuck if Xeno sticks his tongue inside of Spudsy's asshole one way or the other. This has nothing to do with me. If some retard wants to sit in a Discord shit talking me, I will just make him look stupid. That is what I did. I don't give a fuck about any of these people. But I think at a certain point I became way too self-indulgent." (URL:

https://www.youtube.com/watch?v=24F7CxpU8jo&ab_channel=Desolance).


30. Upon information and belief, YouTube banned Target's channel "@Desolance" and removed all videos on or around November 10, 2023, but I expect without injunctive relief he will continue to publish false statements about me.
31. I have incurred financial losses in the form of lost subscribers from my Twitch channel as the direct result of Target's publication of these false statements about me. From January until June 2023, when the frequency and severity of Target's defamatory publications noticeably increased, I averaged revenue of \$23,966.50 per month. From July through October, my average revenue has been \$18,689.25, a difference of \$5,277.25 per month. In July 2023, when much of the worst of Target's content was published, I lost 1,286 subscribers.
32. The total of my lost revenue in July through October 2023 is \$21,109. I anticipate that I will continue to experience lower subscription rates to my Twitch channel as a result of the Defendant's conduct.
33. I am also requesting equitable relief in the form of permanent injunction that (1) prohibits Target, his agents, and persons or entities in active concert or participation with him, from creating or publishing statements about me, which defame, disparage, or contain libelous statements about me; and (2) orders the removal from the Internet, including YouTube and search engines including but

not limited to Google, Bing, and Yahoo, of all defamatory, disparaging, libelous, and false statements about me by Target, including but not limited to the videos identified herein.

34. While I have sustained financial harm as a direct and proximate result of Defendant's conduct, there is no adequate remedy at law to compensate me for the irreparable harm that is being caused by the Statements, as they will remain on the Internet and continue to damage my reputation indefinitely if not removed.
35. By the course of his conduct, including the continued publication of false and defamatory statements about me after being served with this lawsuit and his failure to answer or appear in this lawsuit, Defendant has made it clear that he does not intend to stop publishing defamatory statements about me absent an order to do so.
36. Considering the balance of hardships between Plaintiff and Defendant, equitable relief in the form of a permanent injunction is warranted.
37. The public interest would not be disserved by granting equitable relief in this matter.
38. Target is not an infant or incompetent person.
39. Target is not in military service as defined in the Servicemembers Civil Relief Act, 50 U.S.C. § 3901.
40. I have been informed and believe that service was perfected on Target on October 5, 2023.
41. More than 20 days have elapsed since service was perfected and Target has not answered or otherwise responded to the Complaint. No appearance has been entered and no extension has been requested or granted.

42. I have been informed and believe that on October 26, 2023, Target was served with a Request for Entry of Default, and that a Default was entered against him on October 27, 2023.

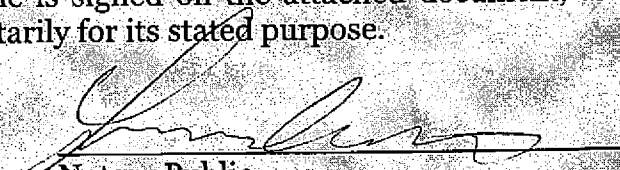
Signed under the pain and penalty of perjury this 10th day of November, 2023.



Plaintiff Tyler Martin

STATE OF Kansas
COUNTY OF Sedgwick, SS

On this 10th day of November, 2023, Plaintiff Tyler Martin did appear before me, the undersigned notary public, proved to me through satisfactory evidence of identification to be the person whose name is signed on the attached document, and acknowledged to me that he signed it voluntarily for its stated purpose.



Notary Public

