

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. _____

JANE DOE, a United States resident and citizen,

Plaintiff,

v.

MARK ANTHONY YOUNG, a United Kingdom citizen,
CAROL AALIYAH MUHAMMAD, a United Kingdom citizen, and
ELITE AB CLINIC, Ltd., a United Kingdom corporation,

Defendants.

COMPLAINT AND JURY TRIAL DEMAND

Plaintiff Jane Doe, by and through her counsel of record, pursuant to F.R.C.P. 3, 7(a) and 8(a) of the Federal Rules of Civil Procedure, commences this action by filing this Complaint against Defendants Elite AB Clinic, Ltd., and its owners, Mark Anthony Young and Carol Aaliyah Muhammad, and states and alleges as follows:

PARTIES

1. Ms. Doe is an individual and a United States (“U.S.”) citizen domiciled in the State of Colorado.
2. Defendant Elite AB Clinic, Ltd., is a corporation with its principal place of business in the United Kingdom (“Elite AB Clinic”), at 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ.

3. Based on information and belief, Defendants Mark Anthony Young and Carol Aaliyah Muhammad are United Kingdom citizens. Public records list both Mr. Young and Ms. Muhammad as the directors and owners of Elite AB Clinic.

JURISDICTION AND VENUE

4. This Court may exercise subject matter jurisdiction over the claims set forth in this Complaint because “the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between . . . citizens of a State and citizens or subjects of a foreign state.” 28 U.S.C. § 1332(a)(2). This matter also involves violations of federal law, specifically the Copyright Act (17 U.S.C. §§ 101 et. seq.).

5. Venue in this Court is proper because, “if there is no district in which an action may otherwise be brought as provided in this section, [the action may be brought in] any judicial district in which any defendant is subject to the court’s personal jurisdiction with respect to such action.” 28 U.S.C. § 1391(b)(3).

6. 28 U.S.C. § 1391(c)(2) also provides for venue in the underlying litigation because “an entity with the capacity to sue and be sued in its common name under applicable law, whether or not incorporated, shall be deemed to reside, if a defendant, in any judicial district in which such defendant is subject to the court’s personal jurisdiction with respect to the civil action in question.”

7. This Court may exercise personal jurisdiction consistent with the Constitution of the United States over the Defendants as they purposefully targeted American companies, individuals, consumers and the intellectual property of American citizens. See *Lang Van, Inc., v. VNG Corporation*, No. 19-56452 (9th Cir. 2022).

8. Personal jurisdiction may also be established pursuant to Fed. R. Civ. P. 4(k)(2), which states: “ Federal Claim Outside State Court jurisdiction. For a claim that arises under federal law, serving a summons or filing a waiver of service establishes personal jurisdiction over a defendant if: (A) the defendant is not subject to jurisdiction in any state’s courts of general jurisdiction; and (B) exercising jurisdiction is consistent with the United States Constitution and laws.”

STATEMENT OF FACTS

9. Elite AB Clinic is a registered corporation in the United Kingdom per the Companies House website, owned and operated by the United Kingdom government.

10. Mr. Young and Ms. Muhammad are both listed on the company’s official government registration documents as its directors.

11. Elite AB Clinic represents online that it is in the process of opening a clinic in the United States per its Facebook Page for the proposed clinic, as well as other social media.

12. The Elite AB Clinic Facebook page for the proposed clinic in the United States (“US Elite AB Clinic Facebook”) is located at <https://www.facebook.com/groups/244894807207052/>.

13. The About Section for the US Elite AB Clinic Facebook page as of July 10, 2023, reads as follows:

“We hope to open a Clinic in the USA in 2023 and are actively seeking a Investor. The Clinic will have more than one Therapist/Counsellor available as there are many reason, we do the ABDL. On the weekend the Nanny would take care of all your needs, and these would be discussed before you visit so we can give you the care you want. Each Nursery will have a cot and Highchair with a changing table and a large sofa with soft toys and a Large TV for Cartoons or Videos. Over the weekend the therapist will give you 6 sessions of therapy, and this of course will be between you and the Therapist. We will also have a sand pit and a small play area in the Garden, which is not overlooked, There will also be a room if the AB wants to bring a partner or Carer with them for the experience. The Format of the Visit is very open as it’s a Bespoke service and I want to make

it available to as many as possible.”

See **Exhibit 1** (attached).

14. Per a February 3, 2023, public post on the Elite AB Clinic Europe Twitter account, Mr. Young is currently building a clinic in Ohio. See **Exhibit 2** (attached).

15. The Defendants have also held out to the public that Elite AB Clinic is in the process of opening a clinic in the United Kingdom.

16. The Elite AB Clinic Facebook page for the proposed clinic in the United Kingdom is located online at <https://www.facebook.com/groups/379083935773913>.

17. Mr. Young is an administrator for both the US Elite AB Clinic Facebook Page and the UK Elite AB Clinic Facebook Page. See **Exhibit 1** and **3** (attached).

18. Elite AB Clinic and Mr. Young have come under public scrutiny in recent years for allegedly engaging in a scam to take money from individuals who believe they are investing in a clinic to provide mental health services to a niche community with childhood trauma, only to discover that the representations on which they relied were false, including but not limited to the status of construction, and affiliated medical professionals. See **Exhibit 4** (attached).

19. In 2023, Dr. Rhoda Lipscomb issued a public statement (“Dr. Lipscomb Public Statement”) on her website about Elite AB Clinic and Mr. Young’s apparently fraudulent behavior and ongoing scheme to take money from investors who believe they are funding an actual clinic, including representing to third-parties that Dr. Lipscomb was involved with the clinic when she was not in reality.

20. The Dr. Lipscomb Public Statement is located at <https://thediaperdoctor.com/statement-regarding-elite-ab-clinic-and-mark-young/>.

21. Ms. Doe holds intellectual property rights in her professional photos associated with her

business and industry persona, Goddess Kat Marie.

22. Ms. Doe operates under her fictitious persona of “Goddess Kat Marie” as a sex industry professional, including but not limited to high-end online erotic modeling (often fully-clothed), performance art via suspension devices and roleplaying, and holding private, VIP, screened theme parties.

23. Ms. Doe has taken steps, as many individuals do in this industry, to protect herself from harassment and retaliation for her participation, including keeping many of her professional images behind a privacy or pay-wall.

24. Ms. Doe previously operated a private Tumblr account on which she posted selections of her professional images.

25. Many of these pictures were taken without authorization from behind a privacy wall and reposted on Tumbex.com.

26. Prior to April 28, 2023, Ms. Doe learned that Mr. Young was posting her professional images on social media accounts for Elite AB Clinic without her permission, authorization, or consent.

27. Ms. Doe contacted Mr. Young through Twitter and demanded that he stop posting her professional images on Twitter, explicitly stating she holds the intellectual property rights to them.

28. Mr. Young initially agreed to cease posting Ms. Doe’s professional images and took them down, but began to engage in the same misconduct again on or around April 28, 2023.

29. Ms. Doe at no time has been affiliated with Elite AB Clinic.

30. Ms. Doe has no desire to be affiliated with Elite AB Clinic, in part due to the fact that Elite AB Clinic is believed by many people online to be a scam.

31. When Mr. Young would not stop posting Ms. Doe’s professional images, she began on or around April 28, 2023, to post on social media that she is not affiliated with Elite AB Clinic and that the company is using her professional images without her authorization, approval, or consent.

32. Ms. Doe publicly posted that she was not affiliated with Elite AB Clinic to mitigate her own damages and clarify any consumer confusion.

33. Ms. Doe tagged the Elite AB Clinic Twitter to put Mr. Young and his company on further legal notice of her lack of consent to use her professional images, name or likeness.

34. Although Mr. Young would state in same or similar terms that he was allowed to do so under fair use in response to Ms. Doe, specifically that he was simply resharing pictures on social media using the internal application tools, he both used images known to be unauthorized and behind a privacy wall from Tumbex, as well as failing to credit Ms. Doe and removing her own advertising language.

35. In one example of many, Mr. Young posted a copyrighted image of Ms. Doe with the following above the image “ another-chapter-of-the-mouse-and-the-motorcyletumbex.com/goddesskatmari @Goddesskatmarie”. See **Exhibit 5** (attached).

36. The URL “another-chapter-of-the-mouse-and-the-motorcyletumbex.com/goddesskatmari” does not actively link to any website or webpage.

37. The Tumbex post Mr. Young claims to have simply reshared using internal application tools includes the following original text from Ms. Doe’s Tumblr account:

“Another Chapter of the Mouse and the Motorcycle tonight... We are getting to the good parts Come join us every Monday for more of Mommy's favorite book during Monday’s with Mommy Kat
https://www.instagram.com/p/Ci_sbD3jfAY6qyOU3N4kPvH9VWwn3mjRIITnG00/?igshid=NGJjMDIxMWI=”

See **Exhibit 6** (attached).

38. Based on information and belief, Mr. Young removed all descriptive text accrediting the work to Ms. Doe and the business event associated with the advertisement.

39. Mr. Young also was on notice that the image in question from Tumbex.com was stolen and being used without Ms. Doe's authorization, permission or consent.

40. On May 8, 2023, Mr. Young sent Ms. Doe a message from the Elite AB Clinic Europe Twitter account (@AdultBabyGalaxy) which reads: "Hi I hope you are well."

41. Ms. Doe responded later that same day on May 8, 2023, with a clear message: "Stop posting my trademarked images." See **Exhibit 7** (attached).

42. On or around May 8, 2023, Ms. Doe filed takedown requests under the Digital Millennium Copyright Act with Twitter against the Elite AB Clinic account.

43. While initially successful, Twitter stopped the holds on the Elite AB Clinic account as Ms. Doe had not taken any legal action yet against Mr. Young or his company.

44. On or around May 19, 2023, Mr. Young in response to the DMCA takedown requests sent Ms. Doe the following message through the Elite AB Clinic LTD Twitter account:

"I do not want to Ruin your business. I ask that you stop tweeting about me and I will leave you alone. If not I will share your content with all Right wing sites and also law enforcement in the USA. I repeat please you have a thriving Business I don't want to hurt it but you really need to stop. Thanks for your time Mark Young."

See **Exhibit 8** (attached).

45. On or after May 19, 2023, Mr. Young using the Elite AB Clinic Twitter account began to post Ms. Doe's professional images from her Instagram page without her authorization, permission, or consent.

46. On or around July 4, 2023, Mr. Young using the Elite AB Clinic Twitter account tagged Ms. Doe’s Twitter account and wrote: “Because you endorse the two accounts [@Lars_Alister and @notELITECLINIC] below, I take this as an okay to post your private pictures from your paid accounts.”

47. Mr. Young owns and runs a paid-Patreon account, on which he is believed to be disseminating Ms. Doe’s professional images without her authorization, permission or approval based on his statements in Paragraph 46.

48. Elite AB Clinic represents that it advertises products and other business affiliates on its website and social media.

49. On May 31, 2023, the Elite AB Clinic Twitter posted the following: “Come and advertise your Adult Baby Products with us at Elite AB Clinic LTD. Our Website is first on Google when Adult Baby Nursery is searched. We are also fourth for ABDL Nursery. Email adverts@eliteabclinic.com” See **Exhibit 9** (attached).

50. The Instagram page for Elite AB Clinic LTD (eliteabsnursery) explicitly states it has “proud adult nappy ambassadors.”

51. Based on information and belief, including Mr. Young’s representations and past behavior, he and his company are profiting, or attempting to profit, off Ms. Doe’s name and likeness without her authorization, permission, or approval, through use of her professional images and private pictures from her paid accounts.

52. Based on information and belief, consumers have confused Ms. Doe’s association with Elite AB Clinic and that she is a “Proud Adult Nappy Ambassador” or otherwise affiliated with the company.

53. Ms. Doe has experienced severe emotional distress because of Mr. Young, including but

not limited to lost sleep and anxiety for the future of her business being wrongfully affiliated with Elite AB Clinic and its financial scheme, in addition to Mr. Young's explicit threats to subject her to online harassment by turning her into a target of "Right-Wing Media" if she does not stop exercising her First Amendment rights and legal remedies.

54. Mr. Young's use of Ms. Doe's professional images has created community confusion, particularly as his social media represents having professional mommies, nannies and "nappy ambassadors" under the mantle of Elite AB Clinic.

COUNT I
COPYRIGHT INFRINGEMENT
(17 U.S.C. §§ 101 et. seq.)

55. The Plaintiff reasserts and realleges all preceding paragraphs as if set forth in full below.

56. Elite AB Clinic displays on its website and social media professional photographs taken from Ms. Doe's social media accounts to generate profits and revenues, including but not limited to, per Defendant Young's own admission, "private images from paid accounts."

57. The Copyright Act, under which Ms. Doe brings this suit, is intended "[t]o promote the Progress of Science and useful Arts," U.S. Const. art. I, § 8, cl. 8, "by granting authors a limited monopoly over (and thus the opportunity to profit from) the dissemination of their original works of authorship." See *Hunley v. BuzzFeed, Inc.*, 1:20-CV-08844-ALC (S.D.N.Y. Sep. 30, 2021) (citing and quoting *Authors Guild, Inc. v. HathiTrust*, 755 F.3d 87, 95 (2d Cir. 2014)).

58. Congress has provided for four nonexclusive factors that allow an exception to the rule under the doctrine of fair use:

"[T]he fair use of a copyrighted work . . . for purposes such as criticism, commentary, comment, news reporting, teaching (including multiple copies for classroom use), scholarship, or research, is not an infringement of copyright. In determining

whether the use made of a work . . . is a fair use, the facts to be considered shall include-

- (1) the purpose and character of the use, including whether such use is of a commercial nature or is for nonprofit educational purposes;
- (2) the nature of the copyrighted work;
- (3) the amount and substantiality of the portion used in relation to the copyrighted work as a whole; and
- (4) the effect of the use upon the potential market for or value of the copyrighted work.”

See 17 U.S.C. § 107.

59. The inquiry concerns the transformative nature of the work. *Bill Graham Archives v. Dorling Kindersley Ltd.*, 448 F.3d 605, 608 (2d Cir. 2006). It also concerns whether the “use is of a commercial nature or is for nonprofit educational purposes.” 17 U.S.C. § 107(1). “The more transformative the new work, the less will be the significance of other factors, like commercialism, that may weigh against a finding of fair use.” *Campbell v. Acuff-Rose Music, Inc.*, 510 U.S. 569, 569 (1994).

60. The primary purpose and character of the use of Ms. Doe’s images by Defendants or their agents is commercial in nature, specifically to drive viewership to his pages and potential investors.

61. The Defendants or their agents’ use of Ms. Doe’s images is not transformative and makes no changes, alterations, or edits to the original images.

62. The Defendants or their agents’ use of Ms. Doe’s image does not add anything new, with a further purpose or different character, altering the first with new expression, meaning, or message. See *Bill Graham*, 448 F.3d at 608 (quotation omitted); *Authors Guild*, 804 F.3d at 214 (“[A] transformative use is one that communicates something new and different from the original or expands its utility, thus serving copyright's overall objective of contributing to public

knowledge.”)

63. Neither Defendants nor their agents’ credit or identify Ms. Doe as the author or owner of the original images subject to this Complaint.

64. Defendants or their agents merely use the photographs on occasion to identify Ms. Doe and make no modification to the copyrighted material after embedding or reposting the photos.

65. Defendants or their agents simply collect the photos and names of the model — they do not provide any altered expression or meaning to the allegedly infringed work beyond that for which it was originally created by the copyright holders. *Nunez v. Caribbean Int’l News Corp.*, 235 F.3d 18, 23 (1st Cir. 2000) (“[B]y using the photographs in conjunction with editorial commentary, ” the copyrighted work transformed “into news-and not the mere newsworthiness of the works themselves.”).

66. Based on information and belief, as a direct and proximate result of the Defendants or their agents using her intellectual property rights without her permission, authorization, or consent, Ms. Doe has and will continue to experience economic damages to be determined at trial.

COUNT II
MISAPPROPRIATION OF LIKENESS

67. The Plaintiff reasserts and realleges all preceding paragraphs as if set forth in full below.

68. The Defendants used Ms. Doe’s name or likeness when the Defendants or their agents used Ms. Doe’s pictures and videos to falsely represent that she was a brand ambassador or otherwise affiliated with the company.

69. Ms. Doe did not consent to allowing the Defendants or their agents to use her name or likeness, including but not limited to Ms. Doe's name, photographs, videos and other identifying information.

70. The Defendants or their agents did not use Ms. Doe's name or likeness to publicize a true newsworthy event or a matter of public concern.

71. The Defendants or their agents used Ms. Doe's name or likeness to obtain a commercial benefit for itself.

72. The Defendants or their agents' invasion of Ms. Doe's privacy has caused and will cause her to incur the following damages: attorneys' fees; investigation costs; incidental expenses; inconveniences; loss of income; emotional distress; impairment of quality of life; and reputational diminishment.

COUNT III
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

73. The Plaintiff repeats and realleges each of the allegations in the preceding paragraphs previously pled as if each were set forth in full herein.

74. The Defendants or their agents engaged in extreme and outrageous conduct toward Ms. Doe when Mr. Young, using official Elite AB Clinic social media accounts, threatened to send Ms. Doe's intimate pictures, affiliation with certain professional industries, and other identifying information to far right news sources and the police to intimidate or retaliate against her for exercising her legal rights, specifically filing DMCA take-down requests and alerting third-parties to an ongoing scam.

75. The Defendants or their agents engaged in conduct recklessly or with the intent of causing Ms. Doe severe emotional distress.

76. Ms. Doe incurred severe emotional distress caused by the conduct of the Defendants or their agents.

COUNT IV
RESPONDEAT SUPERIOR

77. The Plaintiff repeats and realleges each of the allegations in the preceding paragraphs previously pled as if each were set forth in full herein.

78. Under the doctrine of respondeat superior, Defendant Elite AB Clinic is liable for the acts of its employees or agents, the individual Defendants in this action.

79. At all times relevant, the individual Defendants acted within the scope of their duties with Elite AB Clinic.

80. At all times relevant, the individual Defendants acted in furtherance of their duties to Elite AB Clinic.

81. At all times relevant, the individual Defendants acted with the express authorization of Elite AB Clinic.

82. As a direct and proximate result of the negligence, recklessness, actual malice or willfulness of Elite AB Clinic and its agents, Ms. Doe has sustained mental, psychological, emotional, and reputational damages. Ms. Doe has also suffered additional injuries and damages to be proved at trial.

COUNT V
(Aiding and Abetting)

83. The Plaintiff reasserts and realleges all preceding paragraphs as if set forth in full below.

84. The individual Defendants helped and encouraged each other to engage in extreme and outrageous conduct recklessly or intentionally calculated to cause Ms. Doe severe emotional distress.

85. At least one wrongful objective of the individual Defendants' helping and encouraging one another to engage in the herein alleged wrongful conduct was to coerce or intimidate Ms. Doe out of fear of online harassment from "right wing sites" to not exercise her legal rights or pursue recourse against the Defendants.

COUNT VI

(Permanent Injunction)

86. The Plaintiff reasserts and realleges all preceding paragraphs as if set forth in full below.

87. Absent this Court's permanent injunction, the Defendants will continue to publish Ms. Doe's professional images in violation of copyright law and the common law tort of invasion of privacy by misappropriation of name or likeness.

88. The Plaintiff will suffer irreparable harm if this Court does not grant permanent injunctive relief that proscribes the Defendants and their agents from continuing to publish her professional images herein alleged to be subject to her copyright or interests under the common law tort of invasion of privacy by misappropriation of name or likeness.

89. This Court may grant injunctive relief that proscribes the publication of copyrighted materials as it is unlawful.

90. A permanent injunction will not unduly harm or prejudice the Defendants.

91. Public policy favors granting permanent injunctive relief in this case because granting such relief will support public policies in favor of deterring copyright and intellectual property right violations.

REQUEST FOR RELIEF

Wherefore, Ms. Doe respectfully requests that this honorable Court enter judgment in her favor and against Defendants on Counts I through VI above granting the following relief:

- a. Permanent injunctive relief that prohibits Defendants from engaging in the conduct complained of herein;
- b. Statutory damages pursuant to 17 U.S.C. § 504(c) or, in the alternative, actual damages based on Defendants' earnings resulting from the alleged infringement;
- c. An award of damages in an amount to be determined at trial, but no less than \$150,000.00 USD;
- d. An award of prejudgment and post-judgment interest, as allowed by law;
- e. An award of costs and attorney fees; and
- f. Such further relief as this Court deems just and proper.

JURY DEMAND

Ms. Doe makes a jury demand consistent with Federal Rule of Civil Procedure 38.

Respectfully submitted this 4th day of September 2023,

LAW OFFICE OF CASSANDRA M. KIRSCH, LLC

/s/Cassandra M. Kirsch
Cassandra M. Kirsch, # 46502

LAW OFFICE OF CASSANDRA M. KIRSCH, LLC
600 17th Street, Ste. 2800-S
Denver, CO 80202

Attorney for Plaintiff

Original Signature on File

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

JANE DOE

(b) County of Residence of First Listed Plaintiff Arapahoe County, CO (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Law Office of Cassandra M. Kirsch, LLC, 600 17th Street, Ste. 2800-S, Denver, CO 80202, ckirsch@cmklawoffice.com, (303) 228-2165

DEFENDANTS

MARK ANTHONY YOUNG, a UK citizen, CAROL AALIYAH MUHAMMAD, a UK citizen, and ELITE AB CLINIC, Ltd., a UK corporation

County of Residence of First Listed Defendant Middlesex County, UK (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

N/A

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, LABOR, SOCIAL SECURITY, FEDERAL TAX SUITS, BANKRUPTCY, OTHER STATUTES. Includes various legal categories like Insurance, Motor Vehicle, Personal Injury, etc.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District, 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. § 1332(a)(2); 17 U.S.C. §§ 101 et. seq.

Brief description of cause: Harassment and threats related to use of intellectual property

AP Docket

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE 09/04/2023

SIGNATURE OF ATTORNEY OF RECORD /s/ Cassandra M. Kirsch

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the six boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service; **OR "AP Docket."**
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Colorado



JANE DOE

Plaintiff(s)

v.

Civil Action No.

MARK ANTHONY YOUNG, a United Kingdom citizen,
CAROL AALIYAH MUHAMMAD, a United Kingdom citizen,
and ELITE AB CLINIC, Ltd., a United Kingdom corporation.
Defendant(s)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ELITE AB CLINIC, Ltd.
71-75 Shelton Street, Covent Garden
London, United Kingdom, WC2H 9JQ

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

The Law Office of Cassandra M. Kirsch, LLC
600 17th Street, Ste. 2800-S
Denver, CO 80202
(303) 228-2165
ckirsch@cmklawoffice.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Colorado



JANE DOE

Plaintiff(s)

v.

Civil Action No.

MARK ANTHONY YOUNG, a United Kingdom citizen,
CAROL AALIYAH MUHAMMAD, a United Kingdom citizen,
and ELITE AB CLINIC, Ltd., a United Kingdom corporation,
Defendant(s)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) CAROL AALIYAH MUHAMMAD

71-75 Shelton Street, Covent Garden
London, United Kingdom, WC2H 9JQ

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

The Law Office of Cassandra M. Kirsch, LLC
600 17th Street, Ste. 2800-S
Denver, CO 80202
(303) 228-2165
ckirsch@cmklawoffice.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Colorado



JANE DOE

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CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk



Elite AB Clinic USA.

Join group



About this group

We hope to open a Clinic in the USA in 2023 and are actively seeking a Investor.
 The Clinic will have more than one Therapist/Counsellor available as there are many reason, we do the ABDL.
 On the weekend the Nanny would take care of all your needs, and these would be discussed before you visit so we can give you the care you want.
 Each Nursery will have a cot and Highchair with a changing table and a large sofa with soft toys and a Large TV for Cartoons or Videos.
 Over the weekend the therapist will give you 6 sessions of therapy, and this of course will be between you and the Therapist.
 We will also have a sand pit and a small play area in the Garden, which is not overlooked, There will also be a room if the AB want s to bring a partner or Carer with them for the experience.
 The Format of the Visit is very open as it's a Bespoke service and I want to make it available to as many as possible.
 I have Robert Babybunnykins running the Nursery side of the Clinic,This is a Pic of his old nursery. He has over 40 years Experience taking care of AB's
 I would welcome the chance to discuss my Plans with You,
 Warmest regards Mark **See less**



Public

Anyone can see who's in the group and what they post.





History

Group created on February 5, 2021. Name last changed on August 3, 2022. [See more](#)

Members · 2.2K



Mark is an admin.

[See all](#)

Activity



No new posts today

371 in the last month



2,229 total members

+ 14 in the last week



Created 2 years ago



Elite AB Clinic Europe
 2,679 posts
 tiktok.com
 TikTok · Eliteabclinic
 Check out Eliteabclinic's video.

Follow

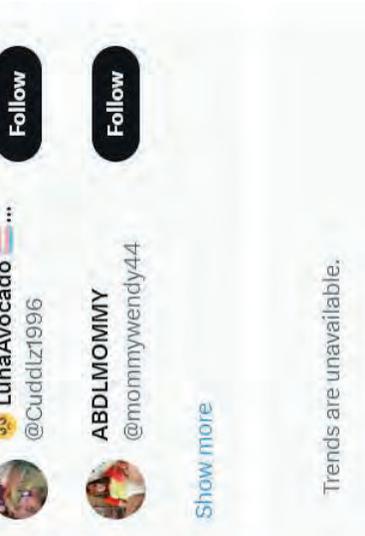
Settings

Sign up with Apple

Create account

By signing up, you agree to the Terms of Service and Privacy Policy, including Cookie Use.

Elite AB Clinic Europe @AdultBabyGalaxy · Feb 3
 We are looking for Investors in the USA so we can build our Clinic.
 Please E-mail Property@eliteabclinic.com for more Information,
 @EliteABClinicUK



Elite AB Clinic Europe @AdultBabyGalaxy · Feb 26
 Sigmund Freud explained age regression as a defence mechanism to allow our pride to protect itself from trauma

You might like

- Jessy @jessy10345019 Follow
- LunaAvocado @Cuddlz1996 Follow
- ABDLMOMMY @mommywendy44 Follow

Show more

Trends are unavailable.

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Don't miss what's happening
 People on Twitter are the first to know.

Log in Sign up

Search Facebook

Elite AB Clinic Europe
Public group · 410 members

Home

Discussion Featured People Events Media Files

About this group

We are looking for investors so we can Open a Clinic in Europe. Please E-mail Property@eliteabclinic.com for more info.

We would collect you from your home or wherever you want collecting from and bring you to the nursery for 7pm on Friday. You then would meet your Nanny/Mummy who will be there the whole weekend to care for you we will also have a Qualified Therapist on site for Sat and Sunday Afternoon. Your Nursery experience will allow you to feel in a safe space by spending the weekend as a little and then interacting with the Therapist.

The care of the client would be done by a Nanny and the therapist would be there for 6-8 hours over the weekend or whatever time is needed. In the week there would be hourly sessions with the Therapist available.

Nanny would be in an adjoining room so you can contact her day or night. We will supply all Nappies (Please let us know your favourite brand) and Milk etc. for the weekend but ask you bring your own bottle with you and any special clothes or teddies. I would like to welcome you to the Elite Nursery and will look forward to you experiencing a luxury life as a Baby for the weekend. You would be driven back home on Monday Morning after your feed and happy change. It's a bespoke service so we will have a questionnaire for your needs. See less

... and what they post.

Public

Mark Young



Owner and CEO at Elite AB
CLINIC LTD Elite Adult
Babies Nursery
Based in Wiltshire

Add friend

Message

Mark is an admin.

See all

Activity

No new posts today
26 in the last month
410 total members
- 5 in the last week




[Log in](#)
[Register](#)



[Forums](#) > [Discussions](#) > **Off-topic** >

Elite ab clinic

 loveducks ·  Aug 29, 2022

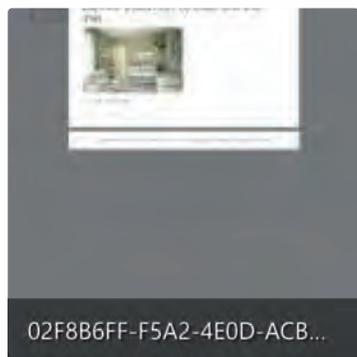
1 of 2
Next ▶
▶▶


loveducks
Est. Contributor

Aug 29, 2022

Please watch out for this as me and others have found Proof he is trying to scam people he says he has no nursery yet has a few five star reviews under fake names (not even good ones he uses names from movies). He also says any picture added on Twitter he will go and copyright it even if not his. Frank Spencer Is a character from a U.K. comedy called some mothers do ave them

Attachments



Last edited: Aug 29, 2022

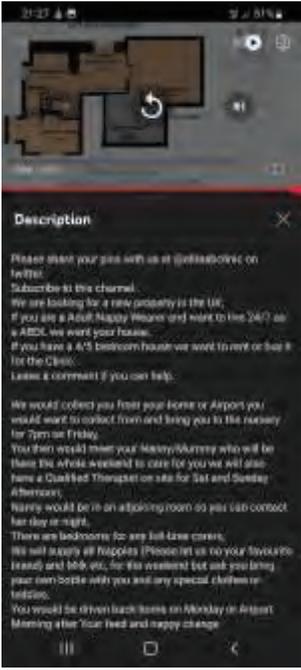
[↩ Reply](#)

 [littledreamers333](#)


loveducks
Est. Contributor

Aug 29, 2022

He is now begging people to use there house



[Reply](#)



BabyTheleste

Est. Contributor

Aug 29, 2022

Weird. If they want to buy a house why don't they just go and buy one on the open market rather than restricting themselves to ABDLs who just happen to have a big house and who just happen to be amenable to selling it. The whole thing doesn't ring true.

[Reply](#)



Anemone

Est. Contributor

Aug 29, 2022

The whole situation seems frankly bizarre. Though that hardly matters if it is a scam, those not susceptible filter themselves out.

[Reply](#)



Bearcatz

Redneck engineering at its finest Est. Contributor

Aug 29, 2022

It sure sounds like a scam.

I toyed with the idea of offering like, snack time, play time, feeding a bottle, a diaper change and a cozy nap as a service, but I'd be more like a teenage girl babysitter than a mommy for the same reason. Doing it mostly for the money. Then again, there are things I work on around the house I couldn't pay someone 100 bucks an hour to do, so it's probably not worth my time anyway.

I guess there's people desperate enough to fall for the scammers like those, though. That stinks.

[↩ Reply](#)

 DisabledNappies



Anemone

Est. Contributor

Aug 29, 2022

Bearcatz said:

I guess there's people desperate enough to fall for the scammers like those, though. That stinks.

Unfortunately there are always vulnerable people and those that would exploit them.

[↩ Reply](#)



abdl86

Time for Cuddling

Est. Contributor

Aug 29, 2022

Yes this really seems to be pretty weird and to good to be true.

[↩ Reply](#)



loveducks

Est. Contributor

Aug 29, 2022

He also says Rhoda lipscomb is on borad as on site dr and Psychologist

[↩ Reply](#)



fleckothefennec

I am fennec hear me scree Est. Contributor

Aug 29, 2022

Sad fox noises,

I thought this was about a clinic for abs, like your stomach muscles, I would have been all over that

[Reply](#)

LainIsLain



loveducks

Est. Contributor

Aug 30, 2022

He seems to loose his cool on Twitter when another person brings it up

[Reply](#)



loveducks

Est. Contributor

Aug 30, 2022

Beware if ur on social media he has started stealing pics and editing them to post on his

[Reply](#)



JustC

Est. Contributor

Aug 30, 2022

Looks like Twitter have suspended him

Last edited: Aug 30, 2022

[Reply](#)

BobbiSueEllen



loveducks

Est. Contributor

Aug 30, 2022

Nope still up

Attachments



[↩ Reply](#)

 BobbiSueEllen



JustC

Est. Contributor

Aug 30, 2022

Must be famous, has a parody acc.

<https://twitter.com/notELITECLINIC>

[↩ Reply](#)



loveducks

Est. Contributor

Aug 30, 2022

He still up aswell he was the one who started exposing mark as a scammer

[↩ Reply](#)



loveducks

Est. Contributor

Aug 31, 2022

He seems to be on attack on Twitter if users here could come together if they have a Twitter by tweeting scammer @eliteabclinic then we have enough people to stop him

Reply



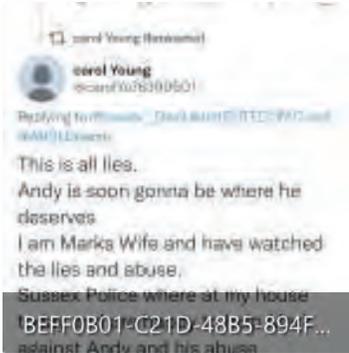
loveducks

Est. Contributor

Sep 1, 2022

He has set up a fake account for his "wife" who has the exact same typing character

Attachments



Reply



DisabledNappies

ABDLScam Buster Contributor

Sep 1, 2022

Not sure what happened here, I had my post accepted but I spelt something wrong so edited it and it was deleted not accepted but lets try it again as I know I didn't brake any rules, anyway you guys are not the only ones following this case I have also <https://twitter.com/DisabledNappies> luckily I was blocked by him so I don't get the back lash Andy gets and I been able to find newer information then Andy as posted yet so far.

Reply



DisabledNappies

ABDLScam Buster Contributor

Sep 2, 2022

Under a new shocking update on my part is Mark knows whom I am of sorts, I have made it clear I am also researching him, but he blocked me on twitter what don't matter as I use the same hashtags as Andy, whom also blocked me strangely enough as I notes there posting times was the same and also the rehashed the same kind of posts a lot of the time, I am little less convinced there the same people now but I still not sure, because I wouldn't so Andy my face so to "verify" whom I was and I wouldn't delete the tweet saying I feel they could be the same people as it's a good way to sure up some drama and never having to offer the clinic

is this one evil man was stopping them at ever stage. but I digress.

The twitter post I posted Marks face in clear detail for people to see and his linked in information where he states to linked in users that he's open and operating but clearly he isn't I posted that as a opening post on his Facebook group so new 100% I was there to keep a eye on him and also maybe let people know his bad actions but he still let me join and welcomed me.

I don't think all the eggs are in the basket with that one.

[Reply](#)



loveducks

Est. Contributor

Sep 5, 2022

Love the fact he been boasting about being in Manchester looking for places and yet this is one he said he looked at

Attachments

The attachments include:

- A photograph of a modern interior space with a wooden beam and a window.
- A map showing the route from Manchester to Yeovil, with a travel time of 5 hr 10 min (267.4 mi).
- A property listing for "35 Preston Road" in Yeovil, Somerset, BA21 3AE, with contact number 556C83AC-540A-42C3-894...
- A map of the United Kingdom highlighting the distance between Manchester and Yeovil, with a travel time of 5 hr 10 min (267.4 mi) and a unique identifier 9F7CB925-93BC-4081-9DC...

[Reply](#)

1 of 2 [Next](#) [▶▶](#)

Rich text editor toolbar with icons for Bold, Italic, Text Color, Background Color, Bulleted List, Numbered List, Link, Image, Smiley, Video, Table, and other editing tools. Below the toolbar is a text input area with the placeholder "Write your reply..."

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Discord Integration © Jason Axelrod of 8WAYRUN

20:33



twitter.com

← Elite AB Clinic ... **Following**

20.2K Tweets

1



Elite AB Clinic... @... · May 6 ...

Elite AB Clinic... @AdultBa... · May 6

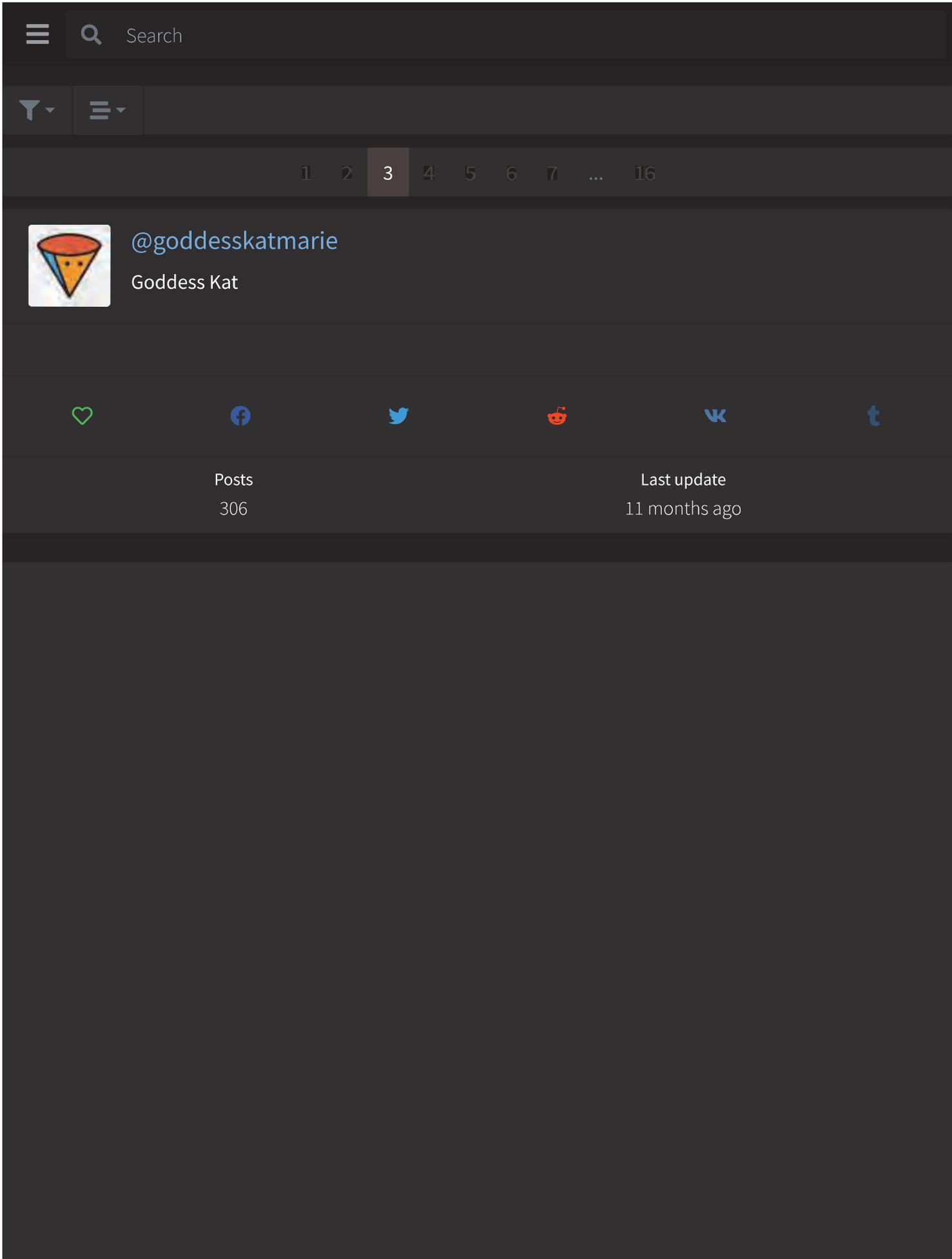
another-chapter-of-the-mouse-and-the-motorcycle
 tumbex.com/goddesskatmari.

@Goddesskatmarie



15







Another Chapter of the Mouse and the Motorcycle tonight.... We are getting to the good parts Come join us every Monday for more of Mommy's favorite book during Monday's with Mommy Kat https://www.instagram.com/p/Ci_sbD3jfAY6qyOU3N4kPvH9VWwn3mjRIITnG00/?igshid=NGJjMDIxMWI=

 20 NOTES 11 MONTHS AGO



Elite AB Clinic Europe
@AdultBabyGalaxy

We are looking for a Investor in the EU. 🥰
Come and support us. 🍼
[#EliteAdultBabiesNursery.](#)
🏥 Love for your Soul.

Joined June 2017 · 293 Followers

Not followed by anyone you're following

Hi I hope you are well.

May 8, 2023, 10:02 AM

You accepted the request

Stop posting my trademarked images

May 8, 2023, 12:01 PM · Sent

You can no longer send messages to this person. [Learn more](#)

Showing 1 message that we discovered online



Joined December 1969 • 5,218 Followers

Today

I do not want to Ruin your Business. I ask that you stop tweeting about me and I will leave you alone. If not I will share your content with all Right wing sites and also law enforcement in the USA. I repeat please you have a thriving Business I don't want to hurt it but you really need to stop.Thanks for your time Mark Young.



11:49 AM

Do you want to let 🌈🌈 Elite AB Clinic LTD 🌈🌈 @eliteabclinic 🌈🌈 message you? They won't know you've seen their message until you accept.

Block or report

Delete

Accept

Now he's threatening me

May 19, 2023, 6:58 PM



14:15

4G

twitter.com

For you

Following



Reply Retweet 2 Like 10 Share



Elite AB Clinic... · May 31

Come and advertise your Adult Baby Products with us at Elite AB Clinic LTD.

Our website is first on Google when Adult Baby Nursery is searched
We are also fourth for ABDL Nursery.

E-mail
adverts@eliteabclinic.com

For Information.



Reply Retweet Like +

Onesies Dow @OnesieDo · May 31

