

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

**FILED**

JUN 10 2025

U.S. DISTRICT COURT  
INDIANAPOLIS, INDIANA

David E. Kelly,

Plaintiff,

v.

Raymond Cedric Young,

Zandrea D. (Woods) Young,

Deja Hicks,

Former Sheriff Joseph M. Arpaio,

Maricopa County Sheriff's Department,

Maricopa County Superior Court,

Retired Judge Margaret Benny,

Judge Steven Lynch,

eBay Inc.,

United States Army Procurement Division,

John Does 1-116,

Defendants.

1:25-cv-1137-TWP-MKK

Case No. \_\_\_\_\_

# **COMPLAINT FOR COPYRIGHT INFRINGEMENT, FRAUD, CIVIL RIGHTS VIOLATIONS, OBSTRUCTION OF JUSTICE, BRIBERY, AND RICO VIOLATIONS**

## **I. INTRODUCTION**

1. This is an action brought under 17 U.S.C. § 501 (Copyright Infringement); 18 U.S.C. § 1964 (RICO); 18 U.S.C. § 201 (Bribery of Public Officials); 18 U.S.C. § 1951 (Extortion); 18 U.S.C. § 1503 (Obstruction of Justice); and 28 U.S.C. §§ 1331, 1338, and 1964.
2. Plaintiff seeks compensatory, statutory, and punitive damages, injunctive relief, and any further relief deemed just and proper for the unauthorized reproduction, distribution, and commercial exploitation of his copyrighted photograph from the 2001 World Series; for fraudulent misrepresentation; obstruction of justice; bribery of public officials; and a racketeering conspiracy spanning over two decades.

## **II. JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction under:
  - 28 U.S.C. § 1331 (Federal Question)
  - 28 U.S.C. § 1338 (Copyright)
  - 18 U.S.C. § 1964 (Civil RICO)
  - 18 U.S.C. § 201 (Bribery)
  - 18 U.S.C. § 1951 (Extortion - Hobbs Act)
  - 18 U.S.C. § 1503 (Obstruction of Justice)
4. Venue is proper in this District pursuant to 28 U.S.C. § 1391, as Plaintiff resides in this District, his business Big League Photos LLC is registered in Indiana, and a substantial part of the events—including the break-in and theft of the original negative and family documents—occurred in this District.

### **III. PARTIES**

4. Plaintiff David E. Kelly is a professional photographer and copyright holder whose legal business address is in Carmel, Indiana.
5. Defendants Raymond Cedric Young, Zandrea D. (Woods) Young, and Deja Hicks are individuals residing in Phoenix Arizona while Raymond Cedric Young is currently involved in drug smuggling activity that has been confirmed by the Drug Enforcement Agency and a well known CIA Officer, named Christopher Gillespie.
6. Defendant Sheriff Joe Arpaio is a former sheriff of Maricopa County, Arizona.
7. Defendants Maricopa County Sheriff's Department and Maricopa County Superior Court are government agencies located in Arizona, with defendants Judge Margaret Benny and Judge Steven Lynch included in this complaint.
8. Defendant eBay Inc. is a corporation with its principal place of business in California and Draper Utah, and the United States Military and Army Procurement Division operates in Alabama and Virginia.
9. Defendants John Does 1–116 are individuals and entities who participated in the unauthorized sale and distribution of Plaintiff's copyrighted work.

## IV. FACTUAL ALLEGATIONS

10. Plaintiff captured a copyrighted photograph during the 2001 World Series and registered the copyright with the U.S. Copyright Office on August 30, 2002,

Type of Work:	Visual Material
Registration Number / Date:	VA0001175518 / 2002-08-30
Title:	Remembering September 11, 2001.
Description:	Photo.
Copyright Claimant:	David E. Kelly (Big League Photos)
Date of Creation:	2001
Date of Publication:	2001-11-03
Rights and Permissions:	Rights & permissions info. on original appl. in C.O.
Names:	Kelly, David E. Big League Photos

11. Plaintiff never authorized Defendants to reproduce, distribute, or sell counterfeit copies of the photograph-poster before or after initial sales agreement contracts proven in Maricopa County Superior Court were breached and a judgement was awarded by default.

12. Raymond Cedric Young unlawfully altered and massively reproduced and sold counterfeit prints of the photograph-poster, falsely claiming ownership by committing business identity theft of Mr. Kelly's Big League Photos LLC and website Big League Photos.

13. Sheriff Joe Arpaio and the Maricopa County Sheriff's Department sold bribery and extorted prints at charity auctions and distributed them to the United States Military and Procurement Divisions. Judge Margaret Benny protected the Sheriff and Raymond Cedric Young by granting 21 continuances in Young's debtors examination hearings after issuing a warrant for Young's initial arrest, and (aka) Ray Young's 2 bankruptcy filings that were denied due to the Young's using multiple social security numbers and the United States Trustee uncovering hidden and unreported income sources. During Kelly's adversary filing.

14. eBay Inc. hosted and profited from unauthorized sales by over 16-24 vendors who sold framed and unframed versions of the photo priced between \$20 and \$1,500 and continues to sell the counterfeit prints to this very day June 10, 2025.

15. Plaintiff estimates hundreds of thousands of infringing copies were distributed nationwide, including those distributed and sold by the U. S. Military and ebay Inc.

16. There were over 72 cease and desists notices sent to Raymond Cedric Young's vendors and to his investors and printers. Only two out of court settlements were reached with 2 of Young's 4 counterfeiting printers and 8 out of court settlements were reached with some of the discovered infringing vendors.

18. There were over 116 vendors discovered by David E. Kelly and his private investigators who helped with the nationwide investigation conducted by David E. Kelly since 8-10 police agencies including the Federal of Bureau Investigations (FBI) Phoenix Arizona, Chandler Arizona Police Department, Phoenix Arizona Police Department, Arizona State Police Department, Maricopa County Sheriff's Department, New York City Police Department, New York State Police Department, Marana Arizona Police Department, Tucson Arizona Police Department, and Indianapolis Police Department all failed to help enforce Mr. Kelly's 14th Amendment Constitutional and Equal Protection & Civil Rights and to arrest Young for these federal and 22 Arizona State crimes under Arizona Statute Title 13.

## **V. CLAIMS FOR RELIEF**

### **Count One – Copyright Infringement (17 U.S.C. § 501)**

19. Plaintiff re-alleges all preceding paragraphs.
20. Defendants illegally copied, distributed, and sold Plaintiff's copyrighted photograph without permission.
21. Plaintiff is entitled to actual and statutory damages, injunctive relief, and disgorgement of profits.

### **Count Two – Fraud**

22. Defendants knowingly misrepresented ownership of Big League Photos and the copyrighted photograph, causing third parties to rely on and profit from fraudulent representations.
23. Plaintiff suffered economic harm, reputational damage, and emotional distress over 23 years as a result.

### **Count Three – Civil RICO (18 U.S.C. § 1962(c))**

24. Defendants engaged in a pattern of racketeering activity, including:
  - Mail and wire fraud
  - Counterfeiting
  - Obstruction of justice
  - Bribery of public officials
  - Extortion
25. Plaintiff experienced threats, intimidation, bodily harm, theft, and illegal interference with his intellectual property and legal proceedings.

### **Count Four – Obstruction of Justice (18 U.S.C. § 1503)**



26. Defendants Arpaio, Young, Judges Benny and Lynch, and others willfully obstructed Plaintiff's pursuit of justice by preventing enforcement of lawful judgments, concealing assets, and issuing improper continuances.

#### **Count Five – Bribery of Public Officials (18 U.S.C. § 201)**

27. Plaintiff alleges that Defendant Arpaio received bribes or personal benefit to distribute counterfeit versions of Plaintiff's work, and used public office to shield Raymond Young from prosecution and accountability.

#### **Count Six – Civil Rights Violations (14th Amendment; 42 U.S.C. § 1983)**

28. Plaintiff's right to equal protection and due process was repeatedly violated by court and law enforcement officials who refused to act, creating a pattern of discriminatory enforcement and denial of justice.

## **VI. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court:

- a. Enter judgment against all Defendants, jointly and severally, for not less than \$10,000,000;
- b. Issue a permanent injunction barring further infringement and distribution of the work;
- c. Award punitive damages, court costs, and—if appointed—attorneys' fees;
- d. Order full accounting and disgorgement of profits from all counterfeit sales;
- e. Grant any other relief deemed just and proper by the Court.

## **VII. JURY DEMAND**

Plaintiff demands a trial by jury on all triable issues.

## **VIII. RELEVANT CASE REFERENCES**



<https://www.superiorcourt.maricopa.gov/docket/CivilCourtCases/caseInfo.asp?caseNumber=CV2006-091932>

[https://www.govinfo.gov/app/details/USCOURTS-azd-2\\_15-cv-02572](https://www.govinfo.gov/app/details/USCOURTS-azd-2_15-cv-02572)

<https://caselaw.findlaw.com/court/us-9th-circuit/1954488.html>

[https://www.supremecourt.gov/DocketPDF/18/18-8986/97646/20190426114806606\\_00000022.pdf](https://www.supremecourt.gov/DocketPDF/18/18-8986/97646/20190426114806606_00000022.pdf)

## NATURE OF SUIT CODES

- 820 – Copyright
- 470 – RICO (Racketeer Influenced and Corrupt Organizations)
- 370 – Other Fraud
- 440 – Civil Rights: Other
- 410 – Antitrust (if a restraint-of-trade conspiracy is clearly alleged)
- 890 – Other Statutory Actions

Respectfully submitted,

Pro Se Plaintiff

David E. Kelly

P.O. Box 235

David E. Kelly

Date:

6/10/2025

Carmel, IN 46082

Email: [contact@bigleaguephotos.com](mailto:contact@bigleaguephotos.com)