

FREEDMAN+TAITELMAN, LLP  
Michael A. Taitelman, Esq. (SBN 156254)  
[mtaitelman@ftllp.com](mailto:mtaitelman@ftllp.com)  
Sean M. Hardy, Esq. (SBN 266446)  
[smhardy@ftllp.com](mailto:smhardy@ftllp.com)  
1801 Century Park West, Fifth Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Fax: (310) 201-0045

Attorneys for Plaintiff O'SHEA JACKSON, SR. (p/k/a "ICE CUBE")

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

O'SHEA JACKSON, SR. (p/k/a "ICE CUBE"),  
an individual,

Plaintiff,

v.

ROBINHOOD MARKETS, INC., a Delaware  
corporation; ROBINHOOD FINANCIAL LLC,  
a Delaware limited liability company,

Defendants.

Civ. No.

**COMPLAINT FOR:**

**(1) Violation of Lanham Act (15 U.S.C. § 1125(a));**

**(2) Violation of California Civil Code § 3344(a);**

**(3) Misappropriation of Likeness Under California Common Law;**

**(4) Unfair Competition under California Business and Professions Code §§ 17200**

**DEMAND FOR TRIAL BY JURY**

1 Plaintiff, O'SHEA JACKSON, SR., professionally known as ICE CUBE ("Ice Cube" or  
2 "Plaintiff"), by and through his undersigned counsel, brings this Complaint against Defendants,  
3 ROBINHOOD MARKETS, INC. ("Robinhood") and ROBINHOOD FINANCIAL LLC ("Robinhood  
4 Financial") (Robinhood and Robinhood Financial are, collectively, the "Defendants"), for damages and  
5 injunctive relief, and in support thereof states as follows:

### 6 INTRODUCTION

7 1. Robinhood is an unscrupulous and predatory conglomerate that professes to be a financial  
8 services company for the everyday person. In truth, Robinhood is a wolf in sheep's clothing. It is the  
9 archetypal example of an amoral corporation that places profits over people. Robinhood's corporate  
10 malfeasance is no secret. Over the course of its brief existence, Robinhood has been: (a) the subject of  
11 investigations too numerous to list, but currently by not less than five separate governmental bodies; (b)  
12 fined several times by federal regulatory agencies, including most recently a \$65 million settlement with  
13 the SEC in December 2020; and (c) named as a defendant in hundreds of lawsuits, including currently  
14 over 50 class action lawsuits. No wonder. In 2020 alone, it was widely reported that Robinhood's stock  
15 trading app – which depends on trigger-finger immediacy – went down not less than **90** separate times.  
16 Robinhood is selling a garbage trading platform to the American public and laughing all the way to the  
17 bank.

18 2. At this point, the evidence is clear that Robinhood is selling a dangerous bill of goods to  
19 unsuspecting consumers across the nation. Robinhood CEO Vlad "the Stock Impaler" Tenev recently  
20 offered corporate crocodile tears during sworn Congressional testimony when confronted with the fact  
21 that an inexperienced 20-year-old Robinhood user committed suicide after he was wrongly told he owed  
22 over \$730,000 due to some risky Robinhood trades. There was no Robinhood helpline for the user to  
23 call and several emails for help went unanswered by Robinhood until the date of his suicide. Human  
24 lives are simply collateral damage as Robinhood single-mindedly rushes toward an initial public offering,  
25 so its feckless and apathetic Millennial founders can jump ship and live out their days in luxury and  
26 hedonism. Robinhood is simply another get-rich-quick scheme for the most privileged people in  
27 America. Robinhood flagrantly displays its belief that it is exempt from the rules and laws that govern  
28 everyone else in the United States.

1           3.       In a cynical effort to appeal to a young demographic, Robinhood has engaged celebrity  
2 endorsers such as Jay-Z, Nas, and Jared Leto to endorse its products and services. However, in an act of  
3 unmitigated gall and transparent retribution, Robinhood and its subsidiary have now used the image and  
4 likeness of Ice Cube – *without* his permission – to promote Robinhood’s terrible products and services.  
5 Robinhood has picked on the wrong man this time.

6           4.       Robinhood’s wholly-owned subsidiary Robinhood Financial serves as a propaganda arm  
7 for Robinhood. Through its “Robinhood Snacks” website and app, Robinhood Financial advertises and  
8 promotes Robinhood’s financial services and products to millions of consumers across the United States.

9           5.       Ice Cube is one of the world’s best-known artists – a rapper, actor, and entrepreneur whose  
10 life story has served as an inspiration to millions. From his days as one of the founding members of the  
11 seminal rap group N.W.A., to his platinum-record selling solo career, to his successful acting endeavors,  
12 Ice Cube’s image and likeness have become a well-established brand. Ice Cube is also a noted activist  
13 for social justice and civil rights, having shepherded and promoted A Contract with Black America in  
14 2020 to address the systemic racism affecting Black Americans.

15           6.       In March 2021, in the midst of Robinhood’s meltdown, Defendants deliberately and  
16 shamelessly misappropriated Ice Cube’s image and likeness to promote Robinhood’s horrible products  
17 and services – the last things in the world to which Ice Cube would *ever* attach his image and likeness.  
18 This blatant theft of Ice Cube’s image and likeness to endorse Robinhood’s dangerous products and  
19 services has resulted in substantial damage to Ice Cube. In short, just as Robinhood’s recent well-known  
20 conduct has resulted in Congressional investigations and numerous class action lawsuits, so too has it  
21 stolen and diminished the hard-earned image and brand of Ice Cube, one of the most prominent Black  
22 voices in America.

23           7.       Ice Cube has spent years meticulously building the value of his image and overall brand  
24 by carefully scrutinizing the products and services he is asked to endorse. This highly selective process  
25 has established Ice Cube’s name and image as a respected brand in multiple categories, ranging from  
26 music to sports. Robinhood is the antithesis of everything that Ice Cube stands for. It represents corporate  
27 greed on a massive scale. In Ice Cube’s view, Robinhood is a textbook example of a greedy corporation  
28 taking advantage of its unwitting consumers. Despite Ice Cube’s written demand that Defendants cease

1 and desist from their continued commercial use of his image and likeness, they shockingly failed and  
2 refused to do so. Knowing that Ice Cube was offended and wished his image and likeness to be removed  
3 should have been enough for Robinhood to do the right thing. But Robinhood just doesn't care about  
4 people – whether they are famous or not. Robinhood and its puppet Robinhood Financial act with  
5 impunity out of malice and greed, under the mistaken belief that they are above the law. Given their  
6 intransigence, Ice Cube now brings this action to set the record straight: Robinhood is a scam that Ice  
7 Cube wants nothing to do with.

### 8 JURISDICTION AND VENUE

9 8. This is an action arising under the Lanham Act, 15 U.S.C. § 1121, California Civil Code  
10 § 3344.1, and California common law.

11 9. This Court has federal question subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331  
12 and 1338.

13 10. This Court has supplemental jurisdiction over the California Civil Code and common law  
14 claims pursuant to 28 U.S.C. § 1367(a).

15 11. Defendants are subject to personal jurisdiction in California.

16 12. Venue is proper in this district under 28 U.S.C. § 1391(b) and (c) because the events  
17 giving rise to the claims occurred in this district, Defendants' principal place of business is in this  
18 district, Defendants engaged in their wrongful acts and infringement on Plaintiff's rights in this district,  
19 and Defendants are subject to personal jurisdiction in this district.

### 20 THE PARTIES

21 13. Plaintiff Ice Cube is, and at relevant times was, a citizen of a California, residing in the  
22 City of Los Angeles, Los Angeles County, California.

23 14. Plaintiff alleges, on information and belief, that Defendant Robinhood is a Delaware  
24 corporation and is headquartered in this district, in the City of Menlo Park, San Mateo County,  
25 California.

26 15. Plaintiff alleges, on information and belief, that Defendant Robinhood Financial is a  
27 Delaware limited liability company and is headquartered in this district, in the City of Menlo Park, San  
28 Mateo County, California.

1 16. Plaintiff alleges, on information and belief, that Defendant Robinhood Financial is a  
2 wholly owned subsidiary of Robinhood.

3 **GENERAL ALLEGATIONS**

4 17. Ice Cube is a world-renowned artist. Ice Cube first achieved recognition and commercial  
5 success as one of the founding members of the pioneering rap group N.W.A. in 1987. In 1990, Ice Cube  
6 embarked on a successful solo recording career. Among Ice Cube's many chart-topping albums, his  
7 1992 album *The Predator* featured his certified-platinum single "Check Yo Self."

8 18. "Check Yo Self" has become one of Ice Cube's signature recordings and is an indelible  
9 part of his image and likeness. Indeed, the lyric and phrase "Check Yo Self" has become nothing less  
10 than Ice Cube's catchphrase. If Ice Cube uses his signature catchphrase, "Check Yo Self," the public  
11 has come to understand that he "means business" and is serious.

12 19. In addition to his successful music career, Ice Cube has also regularly worked as an actor  
13 in motion pictures, beginning with 1991's highly regarded *Boyz n the Hood*.

14 20. Ice Cube has also leveraged his image and likeness in successful entrepreneurial  
15 endeavors. For instance, in 2017, Ice Cube co-founded Big3, a 3-on-3 basketball league that went on to  
16 achieve great success.

17 21. Most importantly, Ice Cube has devoted his life to the cause of social justice and civil  
18 rights, standing up for the disenfranchised in American society. In 2020, Ice Cube's social activism  
19 culminated in the publishing of *A Contract with Black America*, a covenant to right the centuries of  
20 wrongs that have been inflicted on Black Americans.

21 22. The image of Ice Cube is famous and valuable.

22 23. The likeness of Ice Cube is famous and valuable.

23 24. "Ice Cube" is further a registered trademark with the United States Patent and Trademark  
24 Office, bearing the Registration Number 3717252. This registered trademark underscores the fame and  
25 value attributable to Ice Cube's brand and persona.

26 25. Ice Cube's business partner, Jeff Kwatinetz, is a civil rights attorney who recently filed a  
27 class action lawsuit against Robinhood, and has publicly voiced his disapproval of Robinhood and its  
28 business practices on several media outlets. It is public knowledge that Mr. Kwatinetz is associated with

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.