IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

NEIL YOUNG dba SILVER FIDDLE MUSIC,	)	
Plaintiff,	)	
v.	)	Case No. 3:26cv1398
TRUMP 47 COMMITTEE, INC. and DOES 1 through 5,	)	
Defendants.	)	

COMPLAINT FOR COPYRIGHT INFRINGEMENT

Plaintiff Neil Young dba Silver Fiddle Music (hereinafter "Young"), by his undersigned attorneys, alleges:

1. This is a suit for copyright infringement under Title 17 of the United States Code.

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §1338(a) and venue in this District is proper pursuant to 28 U.S.C. §1400(a).

3. Young alleges a cause of action for copyright infringement based on Defendant's unauthorized public performance of Young's copyrighted musical composition *Rockin' in the Free World* on October 12, 2026 at a political rally in Youngstown, Ohio (the "Youngstown Rally").

THE PARTIES

4. Young is a world-renowned singer, songwriter and musician whose career spans six decades. He has received multiple Grammy and Juno awards. He has been inducted into

the Rock and Roll Hall of Fame twice.

5. On information and belief, Defendant TRUMP 47 COMMITTEE, INC. (the "Committee") is a corporation organized and existing under the laws of the Commonwealth of Virginia with a registered agent office address of 100 Shockoe Slip, Floor 2, Richmond, VA 23219-4100.

6. On information and belief, at all relevant times, the Committee did, and still does, finance, conduct, control, manage and supervise rallies designed to encourage attendees to vote for Republican candidates in the mid-term elections scheduled for November 3, 2026.

7. The names, residences and capacities of the Defendants named herein as DOES 1 through 5 are unknown to Young at this time. Young is informed and believes, and thereon alleges, that each of the fictitiously named Defendants is in some way liable, jointly and severally, to Plaintiff for the copyright infringement alleged herein. At such time as the fictitiously named Defendants are identified, Plaintiff will amend this Complaint to state each of their true names, capacities and residences.

FACTS

8. Young wrote and is the co-owner of the copyright in the musical composition *Rockin' in the Free World* (the "Song") registration number PA0000449267. Attached hereto as Exhibit A is a true and correct copy of the U.S. Copyright Office record concerning the registration of the Song.

9. On October 12, 2026, the Committee organized, financed and conducted the Youngstown Rally.

10. Just prior to Donald J. Trump taking the stage to speak at the Youngstown Rally, the Committee caused *Rockin' in the Free World* to be played. On information and belief, the

Committee has caused the Song to be played numerous times at other rallies designed to encourage Republican votes in the upcoming mid-term elections.

11. *Rockin' in the Free World* is a blistering anthem that contrasts the hollow promises of American political rhetoric with the harsh realities faced by the poor, homeless and forgotten. The lyrics paint vivid street-level portraits – a mother discarding her baby, addicts lost in despair, garbage piling in the shadows of prosperity – while the repeated chorus delivers a savage irony, celebrating freedom that clearly isn't shared by all. In short, the Song is the opposite of everything that Donald J. Trump stands for.

12. Since its first release in 1989, *Rockin' in the Free World* has had, and continues to have enormous popularity, having been performed even within the last few weeks by numerous famous musical artists such as Roger Daltrey, Lucinda Williams, Bruce Springsteen, Dave Grohl, Dave Matthews and Billy Strings, resulting in the Song being named Vintage Rock Song of 2026 by Rolling Stone Magazine.

13. The Committee does not now have, and did not at the time of the Youngstown Rally or any other rally financed and conducted by the Committee, have a license or Young's permission to play the Song at any public political event.

14. On information and belief, Donald J. Trump ("Trump") is now and at the time of all rallies this year was personally aware that a license would be required to play the Song at rallies and that Young has not, and would not, grant the required license. In 2020 Young sued another corporation formed by Trump, Donald J. Trump For President, Inc., for copyright infringement of *Rockin' in the Free World* along with another song written by Young. Donald J. Trump For President, Inc. asserted no defense and immediately settled shortly after it was

served, promising that it would never again use *Rockin' in the Free World* without a license and permission from Young,

15. The Committee has willfully proceeded to cause the Song to be played despite its lack of a license and despite its knowledge that a license is required to do so.

FIRST CLAIM FOR RELIEF
FOR COPYRIGHT INFRINGEMENT
AGAINST ALL DEFENDANTS

16. Young repeats and incorporates by reference the allegations contained in Paragraphs 1 through 15 above as though fully set forth.

17. The acts of the Committee and DOES 1 through 5 constitute copyright infringement under Title 17 of the United States Code.

18. The Committee and DOES 1 through 5 acted willfully and in conscious disregard for Young's rights.

19. As a direct and proximate result of Committee's infringements, Young has suffered and continues to suffer great injury. Among other things, Young has suffered damage to his reputation and brand as a result of the implication that he supports Donald J. Trump in any way.

WHEREFORE, Young prays for relief as follows:

1. That Defendants and all persons acting under the direction, control or authority of Defendants be enjoined preliminarily and permanently from publicly performing the Song – or any musical compositions owned by Young – and from causing or permitting the Song to be publicly performed at public events conducted, controlled, managed, supervised or arranged for by the Committee and/or aiding or abetting the public performance of the Song in any such place;

2. That Defendants be ordered to pay damages in the amount of Ten Million Dollars ($10,000,000);

3. That Defendants be ordered to pay Young his costs of suit herein, including reasonable attorney's fees pursuant to 17 U.S.C. §505; and

4. For such other relief as the Court may deem just and equitable.

Dated: October 26, 2026

Respectfully Submitted,

By: *Robert S. Besser*
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(*Pro hac vice* application forthcoming)
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