

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STRIKE 3 HOLDINGS, LLC,

Plaintiff,

v.

JOHN DOE subscriber assigned IP address
66.44.116.2,

Defendant.

Civil Case No. 1:26-cv-01665-JDB

**FIRST AMENDED COMPLAINT-ACTION FOR DAMAGES FOR
PROPERTY RIGHTS INFRINGEMENT**

Plaintiff, Strike 3 Holdings, LLC (“Strike 3” or “Plaintiff”), brings this First Amended Complaint against Defendant, John Doe subscriber assigned IP address 66.44.116.2 a/k/a [REDACTED] (“Defendant”), and alleges as follows:

Introduction

1. This is a case about the ongoing and wholesale copyright infringement of Plaintiff’s motion pictures by Defendant.
2. Plaintiff is the owner of award-winning, critically acclaimed adult motion pictures.
3. Strike 3’s motion pictures are distributed through the *Blacked*, *Blacked Raw*, *MILFY*, *Slayed*, *Tushy*, *Tushy Raw*, *Vixen*, and *Wifey* adult websites and DVDs. With millions of unique visitors to its websites each month, the brands are famous for redefining adult content, creating high-end, artistic, and performer-inspiring motion pictures produced with a Hollywood style budget and quality.
4. Defendant is, in a word, stealing these works on a grand scale. Using the BitTorrent

protocol, Defendant is committing rampant and wholesale copyright infringement by downloading Strike 3's motion pictures as well as distributing them to others. Defendant did not infringe just one or two of Strike 3's motion pictures, but has been recorded infringing 44 movies over an extended period of time.

5. Although Defendant attempted to hide this theft by infringing Plaintiff's content anonymously, this court's order permitted Plaintiff to serve a subpoena on Defendant's Internet Service Provider ("ISP"), Astound Broadband LLC., to discover the identity of the subscriber assigned to IP address 66.44.116.2, the IP address the Defendant used to download and share Plaintiff's works.

6. Based on Plaintiff's investigation of the subscriber and publicly available resources, Plaintiff identified Defendant as true infringer.

7. This is a civil action seeking damages under the United States Copyright Act of 1976, *as amended*, 17 U.S.C. §§ 101 et seq. (the "Copyright Act").

Jurisdiction and Venue

8. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1338 (jurisdiction over copyright actions).

9. This Court has personal jurisdiction over Defendant because Defendant used an Internet Protocol address ("IP address") traced to a physical address located within this District to commit copyright infringement. Therefore: (i) Defendant committed the tortious conduct alleged in this First Amended Complaint in this State; (ii) Defendant resides in this State and/or; (iii) Defendant has engaged in substantial – and not isolated – business activity in this State.

10. Pursuant to 28 U.S.C. § 1391(b) and (c), venue is proper in this district because: (i) a substantial part of the events or omissions giving rise to the claims occurred in this District; and,

(ii) the Defendant resides (and therefore can be found) in this District and resides in this State. Additionally, venue is proper in this District pursuant 28 U.S.C. § 1400(a) (venue for copyright cases) because Defendant or Defendant's agent resides or may be found in this District.

Parties

11. Plaintiff, Strike 3 is a Delaware limited liability company located at 2140 S. Dupont Hwy, Camden, DE.

12. Defendant, [REDACTED], is an individual currently residing at [REDACTED].

Factual Background

Plaintiff's Award-Winning Copyrights

13. Strike 3's subscription-based websites proudly boast a paid subscriber base that is one of the highest of any adult-content sites in the world. Strike 3 also licenses its motion pictures to popular broadcasters and Strike 3's motion pictures are some of the highest selling adult DVDs in the United States.

14. Strike 3's motion pictures and websites have won numerous awards, such as "best cinematography," "best new studio," and "adult site of the year."

15. Strike 3's motion pictures have had positive global impact, leading more adult studios to invest in better content, higher pay for performers, and to treat each performer with respect and like an artist.

16. Unfortunately, Strike 3, like a large number of other makers of motion picture and television works, has a major problem with Internet piracy. Often appearing among the most infringed popular entertainment content on torrent websites, Strike 3's motion pictures are among the most pirated content in the world.

***Defendant Used the BitTorrent File Distribution Network
to Infringe Plaintiff's Copyrights***

17. BitTorrent is a system designed to quickly distribute large files over the Internet. Instead of downloading a file, such as a movie, from a single source, BitTorrent users are able to connect to the computers of other BitTorrent users in order to simultaneously download and upload pieces of the file from and to other users.

18. BitTorrent's popularity stems from the ability of users to directly interact with each other to distribute a large file without creating a heavy load on any individual source computer and/or network. It enables Plaintiff's motion pictures, which are often filmed in state of the art 4kHD, to be transferred quickly and efficiently.

19. To share a movie within the BitTorrent network, a user first uses BitTorrent software to create a .torrent file from the original digital media file. This process breaks the original digital media file down into numerous pieces.

20. The entire movie file being shared has a hash value (*i.e.*, the "File Hash"). A hash value is an alpha-numeric value of a fixed length that uniquely identifies data.

21. Hash values are not arbitrarily assigned to data merely for identification purposes, but rather are the product of a cryptographic algorithm applied to the data itself. As such, while two identical sets of data will produce the same cryptographic hash value, any change to the underlying data – no matter how small – will change the cryptographic hash value that correlates to it.

22. To find and re-assemble the pieces of the digital media file, *i.e.*, to download the file using BitTorrent, a user must obtain the .torrent file for the specific file that has been broken down into pieces.

23. Each .torrent file contains important metadata with respect to the pieces of the file. When this data is put into the cryptographic algorithm, it results in a hash value called the “Info Hash.”

24. The “Info Hash” is the data that the BitTorrent protocol uses to identify and locate the other pieces of the desired file (in this case, the desired file is the respective file for the infringing motion pictures that are the subject of this action) across the BitTorrent network.

25. Using the Info Hash in the metadata of a .torrent file, a user may collect all the pieces of the digital media file that correlates with the specific .torrent file.

26. Once a user downloads all of the pieces of that digital media file from other BitTorrent users, the digital media file is automatically reassembled into its original form, ready for playing.

27. Plaintiff has developed, owns, and operates infringement detection systems named “VXN Scan” and the “Cross Reference Tool”. Each infringement detection system identifies infringement in two distinct ways.

28. The Cross Reference Tool first searched for and obtained .torrent files claiming to be infringing copies of Plaintiff’s works, and then VXN Scan downloaded complete copies of the digital media files that correlate to those .torrent files.

29. Plaintiff then compared the completed digital media files to Plaintiff’s copyrighted works to determine whether they are infringing copies of one of Plaintiff’s copyrighted works.

30. The digital media files have been verified to contain a digital copy of a motion picture that is identical (or, alternatively, strikingly similar or substantially similar) to Plaintiff’s corresponding original copyrighted Works.

31. VXN Scan used the “Info Hash” value, contained within the metadata of the .torrent

file which correlated with a digital media file that was determined to be identical (or substantially similar) to a copyrighted work, to download a piece (or pieces) of multiple digital media files from Defendant using the BitTorrent network.

32. VXN Scan only downloads pieces of digital media files from Plaintiff's copyrighted works. At no point did VXN Scan upload content to any BitTorrent user. Indeed, it is incapable of doing so.

33. While Defendant was using the BitTorrent file distribution network, VXN Scan established multiple direct TCP/IP connections with Defendant's IP address.

34. Plaintiff identified these pieces as portions of infringing copies of Strike 3's motion pictures.

35. VXN Scan detected, captured and documented Defendant transmitting pieces of Plaintiff's copyrighted motion pictures and recorded those transactions in a Packet Capture ("PCAP") file.

36. Plaintiff also recorded infringement using its Cross Reference Tool.

37. The Cross Reference Tool is designed on the basis of a distributed hash table ("DHT") and is a class of decentralized distributed systems that provides an identification service similar to a hash table: (key, value) pairs are stored in a DHT, and any participating node can efficiently retrieve the value associated with a given key.

38. BitTorrent clients use a DHT to locate peers who are participating in the distribution of the digital media files related to the Info Hash. Specifically, a BitTorrent client locates and connects to the DHT network. That way it registers its own IP address while requesting IP addresses of other peers, which are distributing the same .torrent file.

39. Using this process BitTorrent users are able to locate and connect to a number of

peers within a particular swarm, and download the data related to each .torrent file.

40. A BitTorrent client registers the IP address of the user into the DHT with the purpose of participating in the distribution of constituent pieces of the relevant digital media file.

41. The Cross Reference Tool uses servers that locate .torrent files and their related Info Hashes. The servers subsequently download the torrent information from popular torrent websites. The Cross Reference Tool is incapable of downloading any digital media file associated with an Info Hash, and it has only the ability to download torrent file metadata.

42. Similar to BitTorrent clients, the Cross Reference Tool uses a DHT to obtain the IP Addresses of peers registered to each .torrent file listed in the DHT.

43. The Cross Reference Tool detected and documented that Defendant used the BitTorrent File Distribution Network with the purpose of distributing digital media files that have been determined to be identical (or substantially similar) to Plaintiff's copyrighted motion pictures. At no point did the Cross Reference Tool upload content to any BitTorrent user. Indeed, it is incapable of doing so.

44. Both VXXN Scan and the Cross Reference Tool independently recorded multiple infringements in the manner described above. Collectively, Plaintiff's proprietary software detected 44 number of infringements.

45. Each work infringed by Defendant is listed on Exhibit A and sets forth the Universal Time Coordinated (UTC) time and date of each infringement, along with the Info Hash value obtained from the metadata of the corresponding .torrent file.

46. Exhibit A also sets forth relevant copyright information for each work at issue: the date of publication, the date of registration, and the work's copyright registration number. In a showing of good faith, Plaintiff has intentionally omitted the title of the work from this public

filing due to the adult nature of its content, but can provide a version of Exhibit A containing the works' titles to the Court or any party upon request.

47. Thus, Defendant downloaded, copied, and distributed Plaintiff's Works without authorization.

48. Defendant's infringement was continuous and ongoing.

49. Plaintiff owns the copyrights to the Works and the Works have been registered with the United States Copyright Office.

50. Plaintiff seeks statutory damages, attorneys' fees, and costs under 17 U.S.C. § 501 of the United States Copyright Act.

Discovery Will Likely Show that Defendant is the Individual Who Infringed Plaintiff's

Copyrighted Works

51. Plaintiff's investigation has determined that Defendant is the person who used IP address 66.44.116.2 to infringe on its copyrighted works.

52. Plaintiff utilized the Maxmind geolocation service to determine the ISP that assigned IP address 66.44.116.2 (to determine the correct ISP to whom a subpoena can be sent) and the geographic location of the subscriber of that IP address (to determine the proper venue in which to file an action).

53. Maxmind reported that IP address 66.44.116.2 was assigned by Astound Broadband LLC ("ISP") to a subscriber approximately located in Washington, DC.

54. After the Court granted Plaintiff's request to conduct limited expedited discovery, Plaintiff served the court-authorized subpoena on the ISP on or about June 23, 2026.

55. Upon information and belief, the ISP subsequently provided notice of the subpoena (and this lawsuit) to the subscriber, in compliance with the Cable Communications

Policy Act of 1984 (“CCPA”), 47 U.S.C. § 551 et seq.

56. The ISP responded to the subpoena and identified Defendant as the subscriber assigned the relevant IP address during at least one date of infringement and provided Defendant’s address identified in paragraph 12.

57. The address identified in paragraph 12 is a single-family home.

58. After receiving the ISP’s response to the subpoena, Plaintiff reviewed publicly available information for Defendant and individuals who, upon information and belief, resided in the residence (and therefore had sufficient access to the IP address during the period of infringement).

59. Defendant lived at the residence identified in paragraph 12 above during the period of infringement.

60. Upon information and belief, defendant is the only adult male occupant of the residence identified in paragraph 12 above during the period of infringement.

61. Upon information and belief, the only other occupant of the residence identified in paragraph 12 above during the period of infringement was Defendant’s wife.

62. Plaintiff also logged BitTorrent network activity emanating from IP address 66.44.116.2 involving works other than Plaintiff’s 44 copyrighted works during the period of infringement. Collectively, this evidence is referred to as the “Additional Evidence.”

63. Plaintiff’s Additional Evidence indicates that IP address 66.44.116.2 was used to download and distribute files relating to other adult movies and mainstream media (i.e., movies, music, books, software, TV shows, and other works) using the BitTorrent protocol during the period of infringement.

64. The consistent and prolonged history of BitTorrent activity indicates that the

infringer is unlikely to be a houseguest or infrequent visitor.

65. Publicly available records indicate strong matches between the BitTorrent activity identified in Plaintiff's Additional Evidence and Defendant.

66. [REDACTED].

67. [REDACTED]:

a. [REDACTED]; and

b. [REDACTED].

68. In learning Defendant's true identity, Plaintiff discovered that Defendant's name and address was listed as the internet subscriber another prior BitTorrent copyright infringement case which Plaintiff filed in the U.S. District Court for the District of Columbia. See *Strike 3 Holdings, LLC v. John Doe Subscriber assigned IP address 66.44.96.38*; Civil Case No. 1:22-cv-03104-TNM (D.D.C. Oct 12, 2022) (hereinafter referred to as "Prior Case").

69. In the Prior Case, after obtaining permission from the court, Plaintiff subpoenaed the internet service provider for the subscriber's identity.

70. In the Prior Case, the ISP revealed that the subscriber of the respective IP address was Defendant, [REDACTED] at [REDACTED].

71. Upon information and belief, in each case listed above, the ISP provided notice of the subpoena (and this lawsuit) to Defendant, in compliance with the Cable Communications Policy Act of 1984 ("CCPA"), 47 U.S.C. § 551 et seq.

72. In the Prior Case, Defendant lived at the residence listed above during the respective period of infringement.

73. This consistent and prolonged history of infringement of Plaintiff's works along with another notification to Defendant of the BitTorrent activity occurring from the residence

indicates that the infringer is unlikely to be a houseguest or infrequent visitor.

74. Plaintiff previously decided not to pursue the Prior Case. However, in the instant case, Defendant has been identified as infringing Plaintiff's works through a second unique IP address. And, unless Plaintiff takes further action, there is no indication that Defendant will otherwise stop infringement.

75. Now that Plaintiff has identified Defendant two times, Plaintiff has significant evidence that Defendant is the infringer.

COUNT I

Direct Copyright Infringement

76. The allegations contained in paragraphs 1-75 are hereby re-alleged as if fully set forth herein.

77. Plaintiff is the owner of the Works, which is an original work of authorship.

78. Defendant copied and distributed the constituent elements of Plaintiff's Works using the BitTorrent protocol.

79. At no point in time did Plaintiff authorize, permit or consent to Defendant's distribution of its Works, expressly or otherwise.

80. As a result of the foregoing, Defendant violated Plaintiff's exclusive right to:

- (A) Reproduce its Works in copies, in violation of 17 U.S.C. §§ 106(1) and 501;
- (B) Distribute copies of the Works to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501;
- (C) Perform the copyrighted Works, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the Works' images in any sequence and/or by making the sounds accompanying the Works' audible and transmitting said performance of the work, by means of a device or process,

to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publicly" perform); and

(D) Display the copyrighted Works, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the works non-sequentially and transmitting said display of the works by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publicly" display).

81. Defendant's infringements were committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

WHEREFORE, Plaintiff respectfully requests that the Court:

(A) Permanently enjoin Defendant from continuing to infringe Plaintiff's copyrighted Works;

(B) Order that Defendant delete and permanently remove the digital media files relating to Plaintiff's Works from each of the computers under Defendant's possession, custody or control;

(C) Order that Defendant delete and permanently remove the infringing copies of the Works Defendant has on computers under Defendant's possession, custody or control;

(D) Award Plaintiff statutory damages per infringed work pursuant to 17 U.S.C. § 504(a) and (c);

(E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

(F) Grant Plaintiff any other and further relief this Court deems just and proper.

DEMAND FOR A JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

Dated: September 10, 2026

Respectfully submitted,

THE JAMES LAW FIRM, PLLC

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Exhibit A to the First Amended Complaint

Location: Washington, DC

IP Address: 66.44.116.2

Total Works Infringed: 44

ISP: Astound Broadband

Work	Info Hash	UTC	Site	Published	Registered	Registration
1	E49E0364E268A9E3043E517029F339255C11DB17	05/01/2026 07:29:23	Blacked	06/06/2020	06/22/2020	PA0002245636
2	5c213f0b01cdf83d3122184f6e9c7e88f380c69a	05/08/2026 00:30:19	Blacked	09/12/2017	09/15/2017	PA0002052846
3	6b496a079e35e3d07abf73af73377f897a580e4b	05/08/2026 00:05:17	Vixen	04/22/2022	05/20/2022	PA0002350377
4	a4a91dd53af67964a8ac6ae12af54a5473ec75ee	05/01/2026 05:51:58	Vixen	03/05/2018	04/17/2018	PA0002116085
5	a4be06d0ee2e16b1c2460b95713cbbf3fdf75f34	05/01/2026 05:29:33	Tushy	05/11/2017	06/22/2017	PA0002039286
6	9403A6A586BE77F2F3DD8873DCADA33689C32FAD	04/30/2026 12:44:04	Vixen	09/21/2019	10/01/2019	PA0002217349
7	C7AA78160F747619218126471CB667676D4CABD1	04/29/2026 05:20:03	Vixen	07/23/2017	08/10/2017	PA0002046877
8	6F163C383995F829D551524573789A6FEC5C22D5	04/29/2026 03:43:46	Vixen	06/03/2018	07/09/2018	PA0002109331
9	E4E56EB53224849548E96DEE624085842641888A	04/29/2026 03:29:25	Blacked	07/04/2017	07/07/2017	PA0002070819
10	BD08CDC4AB37B1F288F5D245BC77FD72EC17895E	04/29/2026 03:12:06	Tushy	07/05/2019	08/27/2019	PA0002213300
11	F7188839548F93B4029EDC14E98806CEB83DC987	04/29/2026 02:59:08	Vixen	03/25/2017	06/05/2017	PA0002050771
12	BFB85B9F703F5888BAEBD8555E3FBE3B9C82BCC0	04/29/2026 02:45:14	Blacked	05/30/2017	06/22/2017	PA0002039295
13	2FE4248FF403CC4AC400EB970FBEF1FC8D8454F4	04/29/2026 01:54:06	Blacked	02/09/2018	03/02/2018	PA0002104745
14	2F99D5096FBB974CC1784F2FBE12C56C5BE5C19B	04/29/2026 01:46:57	Tushy	12/22/2017	01/23/2018	PA0002101752
15	8F45D583B36DC71140A38B289CE0AC68E193AF62	04/29/2026 01:46:29	Tushy	01/01/2020	01/27/2020	PA0002223953
16	C4A62B04E3B6453DE67731943CA7677F61A6D71F	04/24/2026 09:14:39	Blacked	01/29/2022	02/14/2022	PA0002335485

Work	Info Hash	UTC	Site	Published	Registered	Registration
17	B1CAFC907E20163EA97C4DC259F25F9162E07FF0	04/24/2026 03:15:30	Milfy	07/23/2025	08/08/2025	PA0002544281
18	002BB2D0AB4D6452FCF997CC409C7ACB1557D514	04/24/2026 00:53:25	Vixen	04/17/2026	04/24/2026	PA0002580450
19	72F05AD20B2A52A07A8904D4D409ECF274545216	04/24/2026 00:48:28	Blacked	12/29/2025	01/02/2026	PA0002558878
20	1F088FC4E9755922CA97B7CAD8E9DA334248AE35	04/24/2026 00:44:32	Vixen	01/02/2026	01/07/2026	PA0002559445
21	BA85BD2E32B7B0E98D0B8311EE25E0B17B0C8492	04/24/2026 00:40:54	Blacked	11/19/2025	11/26/2025	PA0002554939
22	649B9E044CCC76013183E18AC294541E5D8DC976	04/24/2026 00:40:36	Vixen	02/07/2025	02/18/2025	PA0002515982
23	E70D76457C45F77822FCD80DFA0CDA4E56975158	04/24/2026 00:39:05	Blacked	10/05/2025	11/10/2025	PA0002553342
24	C9F4E5106C0FADDD0C3813DB3F17D73321D1DCC2	04/24/2026 00:38:45	Blacked	06/27/2025	07/08/2025	PA0002539161
25	9FB1BDCE63AFC5A04F202FE935FCD91D5DE3CA2A	04/24/2026 00:37:48	Blacked	10/10/2024	10/16/2024	PA0002494697
26	CE0106DC445E239D04CB4AF04795DA3182530D75	04/24/2026 00:33:46	Blacked	04/13/2026	04/24/2026	PA0002580447
27	1FE3FBAB5DE1EB34B5AD5A6026B0051E7E4CDC9E	04/24/2026 00:32:56	Blacked	08/26/2025	09/16/2025	PA0002550979
28	DA41F73C20EF0639FA92F3B337C2B4868D4CC850	04/24/2026 00:32:28	Blacked	03/04/2023	04/07/2023	PA0002405754
29	5C9E70844A68111B3DDCF3630CB4E87FB692172F	04/24/2026 00:31:57	Blacked	03/14/2026	04/07/2026	PA0002577474
30	2B8BB0A39B5049A32F7272833025F7C526900E52	04/24/2026 00:31:03	Blacked	02/12/2026	02/20/2026	PA0002568763
31	E558B9E620FF363FA14B67FAF49B7633DB89BCD5	04/24/2026 00:28:08	TushyRaw	02/01/2026	02/04/2026	PA0002565323
32	C66CCF008783E09955E589F2A159E4C1D85F3E2A	04/24/2026 00:27:30	Tushy	03/01/2026	03/09/2026	PA0002572009
33	3F6BCAA648CD4D0CF43EAF3FE891B3E2AC17E8C	04/24/2026 00:25:44	Tushy	11/02/2025	11/14/2025	PA0002553510
34	15d7d1df03be44784a466b99427c24cfba602d5e	01/30/2026 20:11:12	Blacked Raw	05/22/2018	07/14/2018	PA0002128073

Work	Info Hash	UTC	Site	Published	Registered	Registration
35	21AD397667F0967623A8172989D152104736482E	01/26/2026 19:57:48	Tushy	03/23/2025	03/28/2025	PA0002522497
36	8F50F95182483BB88A548F29157FCF7DA5E25319	01/26/2026 19:53:46	Blacked	01/08/2026	01/26/2026	PA0002563055
37	75ffb37de6e291932061358797a751ea0edde22b	01/11/2026 08:33:26	Vixen	04/09/2018	06/19/2018	PA0002126676
38	2A3326094B2420C4CDBDF3055F8212743781D9BD	12/26/2025 23:42:20	Tushy	12/14/2025	01/02/2026	PA0002558872
39	7AC2F4142635332E29EBD35FE43D28DB460270C5	12/26/2025 18:49:51	Vixen	12/03/2025	12/09/2025	PA0002556440
40	821591D3B453F814B8CD10994842274B6E4CDBE1	12/26/2025 18:47:22	Blacked	09/10/2024	09/17/2024	PA0002490365
41	DE3754185ED21BECD51B664CD095066FDB9C1F8D	12/26/2025 18:40:41	Tushy	04/27/2025	05/20/2025	PA0002531765
42	92B32ADD5738EDEEA22C40CC1910EF675558CFF3	12/19/2025 20:45:47	Blacked Raw	08/04/2025	08/08/2025	PA0002544282
43	F23DACC4CDCEBBDB05A775D9154D717052544001	11/26/2025 04:17:08	Blacked	10/28/2023	11/13/2023	PA0002439611
44	D65938A40A2D7BC0E7F0B59BAA04A5269018B54D	11/26/2025 04:16:24	Vixen	08/30/2024	09/18/2024	PA0002490438