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Attorney for Plaintiff
Strike 3 Holdings, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

STRIKE 3 HOLDINGS, LLC,
Plaintiff,

vs.

JOHN DOE subscriber assigned IP
address 70.181.66.158,
Defendant.

Case Number:

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT - DEMAND FOR
JURY TRIAL**

Plaintiff, Strike 3 Holdings, LLC (“Strike 3” or “Plaintiff”), brings this complaint against Defendant, John Doe subscriber assigned IP address 70.181.66.158 (“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, currently known only by an IP address.

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

1 and DVDs. With millions of unique visitors to its websites each month, the
2 brands are famous for redefining adult content, creating high-end, artistic, and
3 performer-inspiring motion pictures produced with a Hollywood style budget and
4 quality.

5 4. Defendant is, in a word, stealing these works on a grand scale. Using
6 the BitTorrent protocol, Defendant is committing rampant and wholesale
7 copyright infringement by downloading Strike 3's motion pictures as well as
8 distributing them to others. Defendant did not infringe just one or two of Strike
9 3's motion pictures, but has been recorded infringing 24 movies over an extended
10 period of time.

11 5. Although Defendant attempted to hide this theft by infringing
12 Plaintiff's content anonymously, Defendant's Internet Service Provider ("ISP"),
13 Cox Communications, can identify Defendant through his or her IP address
14 70.181.66.158.

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

18 **Jurisdiction and Venue**

19 7. This Court has subject matter jurisdiction over this action pursuant to
20 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1338 (jurisdiction over
21 copyright actions).

22 8. This Court has personal jurisdiction over Defendant because
23 Defendant used an Internet Protocol address ("IP address") traced to a physical
24 address located within this District to commit copyright infringement. Therefore:
25 (i) Defendant committed the tortious conduct alleged in this Complaint in this
26 State; (ii) Defendant resides in this State and/or; (iii) Defendant has engaged in
27 substantial – and not isolated – business activity in this State.
28

9. Plaintiff used IP address geolocation technology by Maxmind Inc. (“Maxmind”), an industry-leading provider of IP address intelligence and online fraud detection tools, to determine that Defendant’s IP address traced to a physical address in this District. Over 5,000 companies, along with United States federal and state law enforcement, use Maxmind’s GeoIP data to locate Internet visitors, perform analytics, enforce digital rights, and efficiently route Internet traffic.

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. Plaintiff currently can only identify Defendant by his or her IP address. Defendant's IP address is 70.181.66.158. Defendant's name and address can be provided by Defendant's Internet Service Provider.

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

1 treat each performer with respect and like an artist.

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

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

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

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

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

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

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

1 how small – will change the cryptographic hash value that correlates to it.

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

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

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

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

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

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

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

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

28 30. The digital media files have been verified to contain a digital copy of

1 a motion picture that is identical (or, alternatively, strikingly similar or
2 substantially similar) to Plaintiff's corresponding original copyrighted Works.

3 31. VXN Scan used the "Info Hash" value, contained within the metadata
4 of the .torrent file which correlated with a digital media file that was determined
5 to be identical (or substantially similar) to a copyrighted work, to connect with
6 Defendant, exchange information, and download a piece (or pieces) of multiple
7 digital media files from Defendant using the BitTorrent network.

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

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

14 34. VXN Scan detected, captured and documented the TCP/IP
15 connections with Defendant including, but not limited to, Defendant transmitting
16 pieces of Plaintiff's copyrighted motion pictures to Plaintiff and recorded those
17 connections in a Packet Capture ("PCAP") file.

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

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

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

26 38. BitTorrent clients use a DHT to locate peers who are participating in
27 the distribution of the digital media files related to the Info Hash. Specifically, a
28 BitTorrent client locates and connects to the DHT network. That way it registers

1 its own IP address while requesting IP addresses of other peers, which are
2 distributing the same .torrent file.

3 39. Using this process BitTorrent users are able to locate and connect to a
4 number of peers within a particular swarm, and download the data related to
5 each .torrent file.

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

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

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

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

23 44. Both VXN Scan and the Cross Reference Tool independently
24 recorded multiple infringements in the manner described above. Collectively,
25 Plaintiff's proprietary software detected 24 number of infringements.

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

1 corresponding .torrent file.

2 46. Exhibit A also sets forth relevant copyright information for each
3 work at issue: the date of publication, the date of registration, and the work's
4 copyright registration number. In a showing of good faith, Plaintiff has
5 intentionally omitted the title of the work from this public filing due to the adult
6 nature of its content, but can provide a version of Exhibit A containing the works'
7 titles to the Court or any party upon request.

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

10 48. Defendant's infringement was continuous and ongoing.

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

13 50. Plaintiff seeks statutory damages, attorneys' fees, and costs under
14 17 U.S.C. § 501 of the United States Copyright Act.

15 **COUNT I**

16 **Direct Copyright Infringement**

17 51. The allegations contained in paragraphs 1-50 are hereby re-alleged as
18 if fully set forth herein.

19 52. Plaintiff is the owner of the Works, which is an original work of
20 authorship.

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

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

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

27 (A) Reproduce its Works in copies, in violation of 17 U.S.C. §§ 106(1)
28 and 501;

1 (B) Distribute copies of the Works to the public by sale or other transfer
2 of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3)
3 and 501;

4 (C) Perform the copyrighted Works, in violation of 17 U.S.C. §§ 106(4)
5 and 501, by showing the Works' images in any sequence and/or by making the
6 sounds accompanying the Works' audible and transmitting said performance of
7 the work, by means of a device or process, to members of the public capable of
8 receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform"
9 and "publicly" perform); and

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

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

17 WHEREFORE, Plaintiff respectfully requests that the Court:

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

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

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

26 (D) Award Plaintiff statutory damages per infringed work pursuant to
27 17 U.S.C. § 504(a) and (c);

28 (E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to

1 17 U.S.C. § 505; and

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

4 DATED this 25th day of September, 2026.

5 **Law Offices of Lincoln Bandlow, PC**

6 *s/ Lincoln D. Bandlow*

7 Lincoln D. Bandlow
8 Attorney for Plaintiff
Strike3 Holdings, LLC

9
10 **DEMAND FOR A JURY TRIAL**

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

12 DATED this 25th day of September, 2026.

13 **Law Offices of Lincoln Bandlow, PC**

14 *s/ Lincoln D. Bandlow*

15 Lincoln D. Bandlow
16 Attorney for Plaintiff
17 Strike3 Holdings, LLC
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