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Cindy Lee Garcia

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

CINDY LEE GARCIA, an individual,

Plaintiff,

vs.

NAKOULA BASSELEY NAKOULA,
an individual also known as SAM
BACILE, MARK BASSELEY
YOUSSEF, ABANOB BASSELEY
NAKOULA, MATTHEW NEKOLA,
AHMED HAMDY, AMAL NADA,
DANIEL K. CARESMAN, KRITBAG
DIFRAT, SOBHI BUSHRA, ROBERT
BACILY, NICOLA BACILY, THOMAS
J. TANAS, ERWIN SALAMEH,
YOUSSEFF M. BASSELEY, and/or
MALID AHLAWI; GOOGLE, INC., a
Delaware Corporation; YOUTUBE,
LLC, a California limited liability
company, and DOES 1 through 10,
inclusive.

Defendants.

Case No. CV12-8315-MWF(VBKx)

**FIRST AMENDED COMPLAINT
FOR:**

1. **Direct Infringement of Copyright**
2. **Secondary Infringement of Copyright**
3. **Fraud**
4. **Unfair Business Practices**
5. **Libel**
6. **Intentional Infliction of Emotional Distress**

[Demand For Jury Trial]

COPY

1 Plaintiff Cindy Lee Garcia ("Garcia"), by and through her counsel, on personal knowledge
2 as to her own actions and information and belief as to the actions, capabilities and motivation of
3 others, hereby alleges as follows:

4 **NATURE OF CASE**

5 1. On July 2, 2012, Defendant Nakoula Basseley Nakoula ("Nakoula") uploaded a 14-
6 minute trailer to the Internet, via YouTube.com, entitled "Innocence of Muslims," (the "Film")
7 making it available for the entire world to see. On or about September 11, 2012, the film gained
8 worldwide recognition after it was translated into Arabic and posted on YouTube.com. On or
9 around September 11, 2012, an Arabic translation of the film was posted on YouTube, where it
10 became the object of attention in many countries, especially those that are predominantly Muslim.

11 2. In the Film, Mohammed, the founder of the Islamic religion, is painted in a light
12 that is considered to be blasphemous by many Muslims. Specifically, the Film portrays as a child
13 molester, sexual deviant, and barbarian. Immediately after the Film received worldwide
14 recognition as described above, violence erupted in the Middle East. The violence included an
15 attack on the United States Consulate in Benghazi, Libya, resulting in the deaths of four
16 Americans, including United States Ambassador Christopher Stevens and two ex-Navy SEALs.

17 3. Violence has continued to erupt across the world, resulting in dramatic events that
18 have unfolded worldwide, including in Afghanistan, Algeria, Australia, Azerbaijan, Bahrain,
19 Bangladesh, Belgium, Canada, Denmark, Egypt, France, Greece, Hong Kong, India, Indonesia,
20 Iran, Iraq, Israel, Japan, Jordan, Lebanon, Kuwait, Macedonia, Malaysia, the Maldives,
21 Mauritania, Morocco, the Netherlands, Niger, Nigeria, Oman, Pakistan, the Palestinian territories,
22 the Philippines, Qatar, Saudi Arabia, Serbia, Somalia, Sri Lanka, Sudan, Switzerland, Syria,
23 Thailand, Tunisia, Turkey, and the United Kingdom. The Film has been attributed worldwide as
24 directly responsible for the resulting violence. United States Secretary of State Hillary Clinton
25 has condemned the Film, calling it "disgusting and reprehensible." President Barack Obama has
26 asked YouTube to review taking down the Film, but has taken no court action.

1 4. Plaintiff is an actress who appears in the Film. In the English version of the Film,
2 at minute 9:03, Plaintiff appears to accuse “your Mohammed” of being a “child molester.” These
3 are words that Plaintiff *never spoke*. In fact, Plaintiff was led to believe that she was appearing in
4 a film titled *Desert Warrior*. According to the casting call to which Plaintiff responded, *Desert*
5 *Warrior* was an adventure film set in ancient times. Plaintiff was cast in the part of a mother of
6 young child who was to be married to a character named “Master George.” At no time during the
7 filming of *Desert Warrior* was Plaintiff aware of *any* religious or sexual content. Indeed, while
8 on-set, most of Plaintiff’s scenes involved playing with the actress who portrayed her “daughter.”
9 The words, “Is Mohammed a child molester,” which are attributed to Plaintiff’s character, were
10 words that she *never* uttered on set or during filming. It is obvious that the words heard on the
11 Film are not consistent with the way in which Plaintiff’s mouth moved – making it obvious that
12 she never uttered those words. These are words that Plaintiff finds repugnant, vile, and hostile and
13 would never say in *any* context, even during the course of a performance. Plaintiff is an ordained
14 minister and would never debase another person’s religious beliefs. It is not in her character, and
15 the thought that she would blaspheme *any* religion or god is profoundly distressing to her.

16 5. When Plaintiff was first cast in *Desert Warrior*, she received pages of the script
17 from Defendant Nakoula, who identified himself as “Sam Bacile.” Defendant Nakoula held
18 himself out as the writer and producer of the Film. He managed all aspects of production, and as
19 far as Plaintiff observed, was in charge of all aspects of the production. During filming,
20 Defendant Nakoula gave Plaintiff his telephone number. The pages of *Desert Warrior* script that
21 Plaintiff kept are attached heretoe as Exhibit A.

22 6. Plaintiff believes she signed a contract, but only one that ensured that she would
23 receive IMBD credit for her performance in “Desert Warrior,” primarily because Plaintiff is a non-
24 union actor. She has been unable to locate a copy of any such contract. She is making diligent
25 efforts to obtain a copy either from Defendant Nakoula or from other actors who appeared in the
26 production. So far, she has not been able to locate a copy. She does recall that the contract did
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1 *not* call for her to transfer any rights, including any copyrights, and that it was not a “work for
2 hire” agreement.

3 7. In any event, even if Plaintiff did sign a contract (in a form unknown to her at this
4 time, if it exists), Plaintiff contends that any such release is invalid because, no matter what its
5 terms, it was procured by Defendant Nakoula’s fraud, deception and misrepresentations. Further,
6 it is the *Defendants’* burden to produce such a release and submit it as evidence, *not* Plaintiff’s
7 burden.

8 8. Despite the fact that Plaintiff was led to believe that she was providing a dramatic
9 performance in an adventure film titled *Desert Warrior*, when the Film was released publicly on
10 YouTube, her depicted performance was grotesquely different than the performance that Plaintiff
11 actually had delivered. Specifically, the innocuous lines that Plaintiff delivered on set were
12 overdubbed so as to give the appearance that she was accusing the Islamic religious figure
13 Mohammed of being a child molester and a sexual deviant. In short, Defendant Nakoula used her
14 as a puppet. The words that were put into Plaintiff’s mouth are so offensive, not only to Plaintiff
15 but to millions worldwide, that it sparked a riots and violence around the globe. In the Film,
16 Plaintiff is depicted to be a bigot and to hold beliefs that are not only anti-Islamic, but antithetical
17 to Plaintiff’s world view.

18 9. Plaintiff would never have, and in fact did not, agree to place her likeness, image,
19 persona, nor her dramatic performance into a hateful production or to be associated with hate
20 speech in any form or fashion.

21 10. Aside from the fallout that occurred after Plaintiff’s performance was distorted and
22 disguised, it is clear that Plaintiff has a copyright claim in the dramatic performance she delivered
23 and which was fixed in tangible form when it was filmed during the production of “Desert
24 Warrior.” Because she did not assign her rights in her dramatic performance, or her copyright
25 interests, nor was the Film a “work for hire,” her copyright interests in her own dramatic
26 performance remain intact.

11. Plaintiff has filed an application for federal copyright registration for the rights in her dramatic performance “Desert Warrior.” The application is pending; Plaintiff has requested that the Copyright Office expedite it. Whether or not the Copyright Office has yet acted upon Plaintiff’s application, federal law creates a copyright when the copyright is created, not upon registration. A true and correct copy of Plaintiff’s copyright application, which identifies the works that are the subject of Plaintiff’s copyright, is attached as Exhibit B.

12. Defendant YouTube's Terms of Service include the following relevant statements: (1) YouTube accounts "must provide accurate and complete information"; (2) the user of YouTube "will comply with all applicable laws"; (3) in uploading content the user must "affirm, represent, and warrant that you own or have the necessary licenses, rights, consents, and permissions to publish Content you submit; and you license to YouTube all patent, trademark, trade secret, copyright or other proprietary rights in and to such Content for publication on the Service pursuant to these Terms of Service"; and (4) YouTube does not "permit hate speech (speech which attacks or demeans a group based on race or ethnic origin, religion, disability, gender, age, veteran status, and sexual orientation/gender identity)." Plaintiff previously requested that YouTube take down the Film because it constitutes hate speech and because the unauthorized, dubbed depiction of her violates California state laws pertaining to her right to privacy and right to control the use of her likeness, among other protected rights that continued exhibition of the Film violates. YouTube refused Plaintiff's request.

13. Plaintiff has issued five DMCA “takedown notices” to Defendants YouTube and Google, who, by rebroadcasting the Film 24 hours a day, 7 days a week, also are infringing Plaintiff’s protected rights in her performance, which fell within the scope of protection of copyright laws the instant her dramatic performance was fixed on film. YouTube and Google have thus far refused to expeditiously remove or disable the infringing content.

GENERAL ALLEGATIONS

A. Jurisdiction and Venue

1 14. This is a civil action seeking damages and injunctive relief for copyright
2 infringement under the copyright laws of the United States, 17 U.S.C. § 101 et seq. Plaintiff also
3 seeks damages and injunctive relief under California state law, were not preempted by Federal
4 law.

5 15. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 (federal
6 question jurisdiction), 28 U.S.C. § 1338(a) (jurisdiction over copyright actions), 28 U.S.C. §
7 1338(b) action asserting a state claim of unfair competition joined with a substantial and related
8 federal claim under the patent, copyright, or trademark laws), 28 U.S.C. § 1367 (supplemental
9 jurisdiction), and the doctrines of ancillary and pendent jurisdiction.

10 16. This Court has personal jurisdiction over Defendants because all Defendants have
11 “continuous, systematic” ties to California, and/or reside in California.

12 17. Venue in this District is proper because a substantial part of the acts and omissions
13 giving rise to the claims occurred in this district.

14 **B. The Parties**

15 18. Plaintiff Cindy Lee Garcia is an individual and at all relevant times herein was a
16 resident of Kern County, California.

17 19. Defendant Nakoula Basseley Nakoula, also known as Sam Bacile (“Defendant
18 Nakoula” or “Bacile”) is an individual and at all relevant times herein as a resident of Los Angeles
19 County, California.

20 20. Defendant Google, Inc., is a corporation incorporated in Delaware with its principal
21 place of business at 1600 Amphitheatre Parkway, Mountain View, California 94043. Google
22 conducts business throughout California, the nation, and the world.

23 21. Defendant YouTube, LLC, is a Google-owned California limited liability company.
24 YouTube conducts business throughout California, the nation, and the world.

25 22. Plaintiff lacks knowledge of the true names and capacities of the defendants sued
26 herein as DOES 1-10, inclusive, and therefore sues these defendants by such fictitious names.
27 These are unidentified posters of the film, as further described below and are individuals who
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1 assisted in the production of the film, as further described below. Plaintiff will amend this
2 complaint to allege their true names and capacities when they have been ascertained.

3 23. At all relevant times, each defendant was the agent of each of the other defendants
4 and was acting within the course and scope of such agency. Defendants are jointly and severally
5 liable to Plaintiff.

6 24. Plaintiff is informed and believes that each of the defendants designated herein as a
7 DOE is responsible in some manner for the events and happenings herein alleged, as well as for
8 the damages alleged.

9 25. Plaintiff is informed and believes that each of the defendants was the agent or
10 employee of each of the remaining defendants and, at all relevant times herein, acted within the
11 course and scope of such agency and/or employment.

12 **FACTUAL BACKGROUND**

13 26. Plaintiff Garcia is an ordained minister and actress. Garcia works in film.

14 27. In July of 2011, Plaintiff Garcia responded to a casting call for a film titled "Desert
15 Warrior," which was represented to be an "historical Arabian Desert adventure film." She was
16 cast in the Film. The producers of the film, including DOES 151-200, and Defendant Nakoula,
17 intentionally concealed the purpose and content of the film.

18 28. Ms. Garcia was given only specific pages of a script titled *Desert Warrior*. There
19 was no mention of "Mohammed" during filming or on the set. There were no references made to
20 religion nor was there any sexual content of which Ms. Garcia was aware. The purported writer
21 and producers of *Desert Warrior*, Defendant Nakoula a/k/a "Sam Bacile," represented to Plaintiff
22 that the Film was indeed an adventure film and about ancient Egyptians. Based on those specific
23 representations made, her parts of the script, and the manner in which the Film was shot, Plaintiff
24 agreed to deliver an acting performance for "Desert Warrior."

25 29. On July 2, 2012, Defendant Nakoula published a video titled *The Innocence of*
26 *Muslims* (the "Film") to the Internet site www.youtube.com, making the Film available publicly
27 and globally. The Film includes Plaintiff's acting work from *Desert Warrior* and has been
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1 changed horrifically to make it appear that Ms. Garcia voluntarily performed in a hateful anti-
2 Islamic production. The Film is vile and reprehensible. Plaintiff was unaware of the vile content
3 contained in the Film, as the content and overall purpose of the Film was concealed from her, and
4 others who appear in the Film, at all times by Defendant Nakoula and DOES 151 through 200.
5 This lawsuit is not an attack on the First Amendment, nor on the right of Americans to say what
6 they think, but does request that the offending content be removed from the Internet because not
7 only it is not speech protected by the First Amendment, it violates Plaintiff Garcia's copyright in
8 her performance.

9 30. Based on information and belief, in around September of 2012, Defendant Nakoula
10 published the Film, with the voices of Plaintiffs and her cast mates dubbed into Arabic, on
11 YouTube. The availability of the Film in Arabic has set off protests and violence first in the
12 Middle East, then worldwide. That violence resulted in the assassination of four embassy officials
13 in Libya, including United States Ambassador Christopher Stevens. On information and belief,
14 Defendant YouTube has made an editorial decision to block the Film from being shown on
15 computers located in Libya, Saudi Arabia, India, Indonesia, and Egypt, but not to block it from
16 being shown in most of the other countries in the world.

17 31. The content of the actors' words in Arabic is currently not known to Plaintiff.

18 32. After the Film was published on YouTube, Plaintiff received death threats, which
19 have increased in numerosity and threat level, despite Plaintiff's efforts to publicly clear her name.

20 33. After the Film was published on YouTube, Plaintiff's family, fearing for their own
21 safety, informed her that she was no longer permitted to see her grandchildren, whom she
22 previously babysat regularly.

23 34. After the Film was published on YouTube, Plaintiff's life changed substantially as
24 a direct result of the Film, in as much as she is now considered a target and the safety of those in
25 her presence cannot be guaranteed.

1 35. On September 19, 2012, an Egyptian Cleric issued a fatwa against Ms. Garcia: "I
2 issue a fatwa and call on the Muslim Youth in American and Europe to do this duty, which is to
3 kill the director, the producer and the actors and everyone who helped and promoted the film."

4 36. Plaintiff requested that Google remove the Film from the YouTube Website. Her
5 request was purportedly passed on to the "YouTube team." The "YouTube team" refused to
6 remove the content, despite her privacy concerns.

7 37. On September 24 and 25, 2012, Plaintiff issued five "takedown notices" to
8 Defendants Google and YouTube pursuant to the Digital Millenium Copyright Act. The notices
9 informed Defendants Google and YouTube that their continued broadcast of the Film on YouTube
10 violated Plaintiff's copyright in her performance. The takedown notices identified an aggregate of
11 171 URLs to be taken down. Defendants Google and YouTube have refused to expeditiously
12 remove or disable the infringing content, despite requests that it do so. A true and correct copy of
13 the DMCA notices is attached as Exhibit C.

14 38. As a result of Defendant Nakoula's falsification of her words in the Film, and
15 Defendants Google and YouTube's refusal to remove the video from the Internet, Plaintiff has
16 suffered the violation of her copyright in her performance, severe emotional distress, the
17 destruction of her career and reputation, the loss of her family and her livelihood, and other
18 financial and non-pecuniary damage. She has been subjected to credible death threats and is in
19 fear for her life and the life and safety of anyone associated with her.

20 39. Despite the suggestions of Defendants and their lawyers that Plaintiff go into
21 hiding, she refuses to do so, because she refuses to become a victim of terrorism and Defendant
22 Nakoula's lies. Her courage in coming forward to clear her name and to tell the world that she
23 does not condone the Film, its message, nor would have ever participated in such an effort is what
24 Plaintiff believes is keeping her alive. Persons around the world, including Muslims, have
25 reached out to her to thank her for taking a strong, public and brave stand against the Film's
26 message, at great peril to herself.

FIRST CAUSE OF ACTION

Direct Infringement of Copyright

Against All Defendants

40. Plaintiff repeats and realleges paragraphs 1 through 39 of this Complaint as though set forth in full.

41. Plaintiff has properly applied to register, and she owns and controls, the copyright in her performance in *Desert Warrior* a/k/a *Innocence of Muslims*.

42. Without authorization from Plaintiff, or any right under law, Defendants, via YouTube, have unlawfully distributed Plaintiff's copyrighted performance millions of times, by transmitting unauthorized copies of those works to YouTube users upon demand in violation of the Copyright Act, 17 U.S.C. § 106.

43. Defendant Nakoula is directly liable for these acts of infringement under the Copyright Act. It was Defendant Nakoula who initially posted an infringing copy of Plaintiff's performance onto YouTube without authorization.

44. Defendant YouTube is directly liable for these acts of infringement under the Copyright Act. The infringing file resides on servers controlled by Google and YouTube. Google and YouTube cause and affect the infringing act of transmitting copies of Plaintiff's performance works from their servers to the computers of their users. Moreover, YouTube does more than merely respond to user requests in a passive, content-neutral, and automated manner. As set forth above, *supra* paragraph 30, YouTube has played an active role in determining the countries in which the Film will be made available, so that the maximum number of YouTube users will access the infringing content. Thus, YouTube is actively involved in creating the supply of infringing content, making that content broadly available for distribution to the worldwide public at large, and physically transmitting and distributing that infringing content to users. It further exercises active control over the distribution process, in exercising editorial control over where it will and will not make the Film available. For these reasons, among others, YouTube engages in active conduct in unlawfully distributing Plaintiff's copyrighted performance to its users. In order to

1 facilitate and expedite distribution of infringing files to YouTube users, YouTube also makes
2 additional unauthorized copies of Plaintiff's copyrighted performance on its own servers in
3 violation of the Copyright Act, 17 U.S.C. § 106. These unauthorized copies are not made by or at
4 the request of YouTube users, but rather through the decisions and actions of YouTube for its own
5 business purposes.

6 45. Defendant Google is jointly and severally liable for each act of YouTube's direct
7 infringement because it directed and participated in, and benefited from, YouTube's infringing
8 conduct as alleged herein, and its corporate policies have been the guiding spirit behind and
9 central figure in YouTube's infringing activities. Further, Google earns advertising revenue from
10 traffic directed to the YouTube site.

11 46. Defendants DOES 1-200 are likewise liable under the Copyright Act for the acts of
12 infringement identified above for acting in concert with Defendants to post infringing copies of
13 Plaintiff's performance without authorization, to operate YouTube and/or for infringing
14 reproductions and distributions of Plaintiff's copyrighted performance separately committed by
15 defendants DOES 1-200.

16 47. The foregoing acts of infringement by Defendants have been willful, intentional
17 and purposeful, in disregard of and indifferent to Plaintiff's rights.

18 48. As a direct and proximate result of Defendants' infringement of Plaintiff's
19 exclusive rights under copyright, Plaintiff is entitled to damages as well as Defendants' profits
20 pursuant to 17 U.S.C. § 504(b), including but not limited to advertising revenues resulting from
21 the placement of embedded advertisements in the Film as posted on YouTube.com.

22 49. Alternatively, Plaintiff is entitled to the maximum statutory damages, in the amount
23 of \$150,000 per infringement, pursuant to 17 U.S.C. § 504(c), or for such other amount as may be
24 proper pursuant to 17 U.S.C. § 504(c).

25 50. Plaintiff further is entitled to her attorneys' fees and full costs pursuant to 17 U.S.C.
26 § 505.

1 51. Defendants' conduct is causing, and unless enjoined and restrained by this Court
2 will continue to cause, Plaintiff great and irreparable injury that cannot fully be compensated for
3 or measured in money. Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C.
4 § 502, Plaintiff is entitled to a preliminary and permanent injunction prohibiting further
5 infringements of her copyright and exclusive rights under copyright.

6 **SECOND CAUSE OF ACTION**

7 **Indirect Infringement of Copyright**

8 **Against All Defendants**

9 52. Plaintiff repeats and realleges paragraphs 1 through 51 of this Complaint as though
10 set forth in full.

11 53. Users of YouTube have infringed, and continue to infringe, Plaintiff's copyright,
12 including without limitation those copyrighted works identified in Exhibit B, by reproducing and
13 distributing works owned by Plaintiff through YouTube, without authorization from Plaintiff, or
14 right under law, in violation of the Copyright Act, 17 U.S.C. § 106. Defendants are liable as
15 secondary infringers under the Copyright Act for each infringing reproduction and distribution of
16 Plaintiff's performance by YouTube users.

17 54. Defendants YouTube and Google are liable under the Copyright Act for inducing
18 the infringing acts of YouTube users. As set forth above, Defendants YouTube and Google
19 operate YouTube and provide the YouTube website and service to their users, with the object of
20 promoting the use of YouTube to infringe Plaintiff's copyrighted performance, as shown by
21 YouTube's clear expression and other affirmative steps to foster infringement. As set forth above,
22 Defendants YouTube and Google's inducement of copyright infringement is evident from, among
23 other things: (i) the continuing infringing content available on YouTube; (ii) technical measures
24 designed to facilitate the widespread dissemination of Plaintiff's copyrighted content, even after
25 she has requested takedown of the infringing content; and (iii) Defendants' failure to use any of
26 the readily-available means to curtail infringement on the YouTube website. Defendants Google
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1 and YouTube, therefore, are liable for inducing the unauthorized reproduction and distribution of
2 Plaintiff's copyrighted work in violation of the Copyright Act, 17 U.S.C. § 106.

3 55. Defendant YouTube is separately liable under the Copyright Act for the infringing
4 acts of its users as a contributory copyright infringer. Defendant YouTube had actual and
5 constructive knowledge of massive copyright infringement of Plaintiff's copyrighted performance
6 by YouTube users, including, without limitation, by means of repeated notices by Plaintiff
7 concerning the infringing files. Indeed, YouTube has full knowledge that it is being used
8 continuously to infringe Plaintiff's rights as a copyright owner. Notwithstanding that knowledge,
9 Defendant YouTube continues to provide a material contribution to that infringement as set forth
10 above, including without limitation by (i) operating, maintaining and further developing the
11 YouTube website and service so as to facilitate YouTube users' infringement of Plaintiff's
12 copyright, (ii) storing infringing content on its servers and making reproductions of such works for
13 faster distribution, and (iii) making multiple copies of Plaintiff's copyrighted work to enable users
14 to quickly access Plaintiff's copyrighted work. Without the active contributions from defendant
15 YouTube, the infringement complained of herein could not have taken place at all, and certainly
16 not on the massive scale enabled by Defendants' actions. Defendant YouTube is, therefore,
17 contributorily liable for the unauthorized reproduction and distribution of Plaintiff's copyrighted
18 works, including those listed on Exhibit B hereto, in violation of the Copyright Act, 17 U.S.C. §
19 106.

20 56. Defendant YouTube is separately liable under the Copyright Act for the infringing
21 acts of its users as a vicarious copyright infringer. Defendant YouTube had the right and ability to
22 supervise and control its users' infringing activity as set forth above, including without limitation
23 by removing Plaintiff's copyrighted performance from its website, terminating infringing users or
24 blocking their access to the YouTube website and service, by policing its computer service to
25 disable access to infringing content, and/or by implementing any number of industry standard
26 technologies or policies that would have substantially curtailed infringing uses of YouTube. In
27 addition, at all relevant times Defendant YouTube derived a financial benefit attributable to its
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1 users' copyright infringement, including infringement of Plaintiff's copyright, specifically through
2 advertising revenues obtained by embedding advertisements into copies of the Film broadcast on
3 YouTube.com. Defendant YouTube is therefore vicariously liable for the unauthorized
4 reproduction and distribution of Plaintiff's copyrighted works, including those listed on Exhibit B
5 hereto, in violation of the Copyright Act, 17 U.S.C. § 106.

6 57. Defendant Nakoula is jointly and severally liable for each act of infringement for
7 which YouTube is liable because he initially posted the infringing copy of Plaintiff's performance,
8 thus directing, participating in, and benefitting from YouTube's infringing conduct as alleged
9 herein.

10 58. Defendants DOES 1-10 are liable under the Copyright Act for the acts of
11 infringement identified above, for acting in concert with Defendants to operate YouTube and/or
12 for unlawfully inducing, knowingly facilitating, and profiting from copyright infringement by
13 YouTube users.

14 59. The foregoing acts of infringement by Defendants have been willful, intentional
15 and purposeful, in disregard of and indifferent to Plaintiff's rights.

16 60. As a direct and proximate result of Defendants' infringement of Plaintiff's
17 exclusive rights under copyright, Plaintiff is entitled to damages as well as Defendants' profits
18 pursuant to 17 U.S.C. § 504(b), including but not limited to advertising revenues resulting from
19 the placement of embedded advertisements in the Film as posted on YouTube.com.

20 61. Alternatively, Plaintiff is entitled to the maximum statutory damages, in the amount
21 of \$150,000 per infringement, pursuant to 17 U.S.C. § 504(c), or for such other amount as may be
22 proper pursuant to 17 U.S.C. § 504(c).

23 62. Plaintiff further is entitled to her attorneys' fees and full costs pursuant to 17 U.S.C.
24 § 505.

25 63. Defendants' conduct is causing, and unless enjoined and restrained by this Court
26 will continue to cause, Plaintiff great and irreparable injury that cannot fully be compensated for
27 or measured in money. Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. § 502,
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1 Plaintiff is entitled to a preliminary and permanent injunction prohibiting further infringements of
2 her copyright and exclusive rights under copyright.

3 **THIRD CAUSE OF ACTION**

4 **Fraud**

5 Against Defendant Nakoula and DOES 1-10

6 64. The allegations set forth in paragraphs 1 through 63 are realleged and incorporated
7 herein by reference.

8 65. Defendant Nakoula and DOE Defendants 1-10 represented to Plaintiff that the Film
9 was an "adventure" film, and that she would be depicted as a benign historical character.

10 66. Defendant Nakoula and DOE Defendants 1-10's representations that he intended to
11 make an "adventure" film, and that Plaintiff would be depicted as a concerned mother, were false.
12 Instead, Defendant Nakoula and DOE Defendants 1-10 made an anti-Islam propaganda film, in
13 which Plaintiff is falsely made to appear to accuse the founder of the Islamic religion of being a
14 sexual deviant and child molester.

15 67. When Defendant Nakoula and DOE Defendants 1-10 represented to Plaintiff that
16 he intended to make an "adventure" film, and that her character was merely to express concern for
17 her child, they knew that the representations were false, or they made the representations with
18 reckless disregard as to their falsity.

19 68. Defendant Nakoula and DOE Defendants 1-10 made the misrepresentations with
20 the intent to defraud Plaintiff. In making the misrepresentations, Defendant Nakoula and DOE
21 Defendants 1-10 intended to induce Plaintiff to rely upon the misrepresentations and to act upon
22 them by agreeing to appear in Defendant Nakoula's "adventure" film.

23 69. At the time Defendant Nakoula and DOE Defendants 1-10 made the
24 misrepresentations, Plaintiff was unaware of the falsity of the misrepresentations. Plaintiff acted
25 in reliance on the truth of the misrepresentations, in that the misrepresentations substantially
26 influenced her actions, and Plaintiff was justified in relying on the misrepresentations.

70. As a direct and proximate result of Defendant Nakoula and DOE Defendants 1-10's intentional misrepresentations, Plaintiff has incurred and will incur substantial damages, in an amount to be determined at trial, and additionally is entitled to an award of punitive damages.

FOURTH CAUSE OF ACTION

Unfair Business Practices Under Cal. Bus. Prof. Code 17200

Against Defendant Nakoula and DOES 1-10

71. The allegations set forth in paragraphs 1 through 70 are realleged and incorporated herein by reference.

72. The aforementioned acts of Defendant Nakoula and the DOE Defendants constitute unfair, fraudulent and/or illegal business practices within the meaning of California's Unfair Competition Law ("UCL"), embodied in Section 17200, et seq. of the California Business and Professions Code.

73. Defendant Nakoula and the DOE Defendants' actions, including fraudulently enticing Plaintiff into appearing in an anti-Islam propaganda film, manipulating the soundtrack of the Film to make it appear that Plaintiff was slandering Islam and Muslim beliefs.

74. Defendant Nakoula and DOE Defendants 1-10's actions were fraudulent in that they deceived Plaintiff as to the true nature of the film project in which she participated, and in that they manipulated Plaintiff's image to create the false appearance of anti-Muslim bigotry by Plaintiff.

75. Defendant Nakoula and the DOE Defendants' actions were illegal in that they violated Section 16600 of the California Business and Professions Code in that the conduct has made it impossible to practice her trade, profession or occupation.

76. Defendant Nakoula and the DOE Defendants' actions were unfair in that, by fraudulently inducing Plaintiff to appear in *Desert Warrior a/k/a Innocence of Muslims*, and by rebroadcasting her dubbed and altered performance worldwide, they have made Plaintiff the target of numerous death threats, and caused her to lose her job and her family, all through no fault of her own.

1 77. Defendant Nakoula and the DOE Defendants' unfair, deceptive, and fraudulent
2 practices originated from and/or occurred primarily in California. The decision to dub Plaintiff's
3 voice to make it appear as though she was spouting inflammatory material about Islam was made
4 in California. The decision to refuse to remove the Film from YouTube was made in California.

5 78. Pursuant to California Business & Professions Code Section 17203, Plaintiff seeks
6 an order of this Court permanently enjoining Defendant Nakoula and the DOE Defendants from
7 continuing to engage in the unlawful, unfair, and fraudulent conduct described herein. Plaintiff
8 seeks an order requiring Defendant Nakoula and the DOE Defendants to: (1) immediately cease
9 the unlawful, unfair, and fraudulent practices stated in this Complaint; and (2) award Plaintiff
10 reasonable costs and attorneys' fees pursuant to California Code of Civil Procedure Section
11 1021.5.

12 79. By reason of the alleged acts and conduct of Defendants, Plaintiff has suffered and
13 will suffer further harm, including the loss of employment, the loss of her family, and the fear of
14 violent retribution. Plaintiff is fully entitled to her remedies allowed under the UCL, including
15 restitution for her lost wages and the cost of security protection for herself and her family.

16 **FIFTH CAUSE OF ACTION**

17 **Against Nakoula and DOES 1-10**

18 **Libel**

19 80. The allegations set forth in paragraphs 1 through 79 are realleged and incorporated
20 herein by reference.

21 81. By making and republishing the Film, Defendant Nakoula and the DOE Defendants
22 made a statement of and concerning Plaintiff or words that suggest that Plaintiff approved the
23 finished product and message of the Film, and stating that Plaintiff said blasphemous words,
24 which she did not.

25 82. The statements are false as they pertain to Plaintiff. In making these statements,
26 Defendant Nakoula and the DOE Defendants knew or should have known that Plaintiff has never
27 called the founder of Islam a child molester.
28

1 83. Furthermore, these statements are defamatory because they carry the meaning that
2 Plaintiff is a religious bigot.

3 84. The statements have been understood by those who saw and heard them on
4 YouTube to mean that Plaintiff it a religious bigot.

5 85. Plaintiff is informed and believes and thereon alleges that the statements that
6 Defendant Nakoula, along with DOE Defendants 1-10, literally "put in her mouth," which Google
7 refuses to remove from YouTube, have been seen and heard by millions of individuals throughout
8 the world, whose names are not presently known to Plaintiff.

9 86. These words were slanderous because they tend to injure Plaintiff in her profession,
10 trade and business by imputing to her a general disqualification for working with the public,
11 something that the occupation and duties of her profession peculiarly require, and the profitability
12 of which is naturally lessened if she is believed to be a religious bigot.

13 87. These words published by Defendant Nakoula and the DOE Defendants were stated
14 not as a matter of opinion, but as a matter of fact, and therefore were not protected or privileged in
15 any way.

16 88. The words published by Defendant Nakoula and the DOE Defendants also were
17 slanderous because Plaintiff never called the founder of Islam a child molester, either on the set of
18 the Film or at any other place or time.

19 89. At no relevant time did Plaintiff ratify or consent to the dissemination of the
20 statements, on YouTube or anywhere else. In fact, Plaintiff subsequently contacted Defendant
21 Nakoula to ask him to remove the Film from YouTube and also contacted Google and YouTube to
22 request the same thing, numerous times.

23 90. Plaintiff is informed and believes and thereon alleges that Defendant Nakoula and
24 the DOE Defendants repeated the false statements to others, including a worldwide audience on
25 YouTube.

1 91. The words that Defendant Nakoula and the DOE Defendants put, and kept, in
2 Plaintiff's mouth carried a defamatory meaning by their very terms and were understood by those
3 who saw and heard them in a way that defamed Plaintiff.

4 92. Defendant Nakoula and the DOE Defendants further published such statements
5 deliberately and with knowledge and intention that such words would be heard by a worldwide
6 YouTube.com audience.

7 93. As a proximate result of Defendant Nakoula and the DOE Defendants' publication
8 of the false statements, Plaintiff has suffered loss of her reputation, shame, mortification, and hurt
9 feelings all to her general damages in a sum to be proven at trial.

10 94. As a further result of Defendant Nakoula and the DOE Defendants' publication of
11 the false statements, Plaintiff has suffered special damages according to proof.

12 95. As the above-described statements were published with malice and oppression and
13 fraud, an award of exemplary and punitive damages is necessary and appropriate.

14 **SIXTH CAUSE OF ACTION**

15 **Against Defendant Nakoula and the DOE Defendants**

16 **Intentional Infliction of Emotional Distress**

17 96. The allegations set forth in paragraphs 1 through 95 are realleged and incorporated
18 herein by reference.

19 97. The conduct set forth hereinabove was extreme and outrageous and an abuse of the
20 authority and position of Defendant Nakoula and the DOE Defendants, and each of them. Said
21 conduct was intended to cause severe emotional distress, or was done in conscious disregard of the
22 probability of causing such distress. Said conduct exceeded the inherent risks of Plaintiff's work
23 as an actress and was not the sort of conduct normally expected to occur in the production of a
24 Film, or in the posting of a film to YouTube. Defendants, and each of them, engaged in conduct
25 intended to make Plaintiff a target of extremist violence.

26 98. The foregoing conduct did in fact cause Plaintiff to suffer extreme emotional
27 distress. As a proximate result of said conduct, Plaintiff suffered embarrassment, anxiety,
28

1 humiliation and emotional distress, and will continue to suffer said emotional distress in the future
2 in an amount according to proof.

3 **PRAYER**

4 Plaintiff Garcia prays for judgment against Defendants as follows:

5 1. For a preliminary and permanent injunction enjoining Defendants and their
6 respective officers, agents, servants, employees, and attorneys, and all persons in active concert or
7 participation with each or any of them, from directly committing, aiding, encouraging, enabling,
8 inducing, causing, materially contributing to, or otherwise facilitating the unauthorized
9 reproduction or distribution of copies of Plaintiff's copyrighted performance.

10 2. For all damages to which Plaintiff may be entitled, including but not limited to
11 Defendants' profits, in such amounts as may be found. Alternatively, as Plaintiff's election, for
12 statutory damages in the maximum amount allowed by law.

13 3. For special damages arising from the loss of business and business opportunities,
14 according to proof at trial.

15 4. For restitution.

16 5. For exemplary and punitive damages.

17 6. For attorney fees and costs of suit incurred herein.

18 7. For such other and further relief as the Court deems just and proper.

19
20 THE ARMENTA LAW FIRM, A.P.C.

21 Dated: October 4, 2012

22
23 By: 

24 M. Cris Armenta
25 Attorneys for Plaintiff
26 Cindy Lee Garcia
27
28

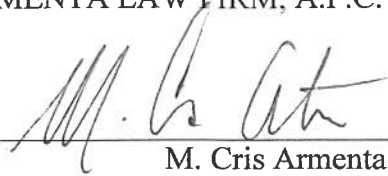
REQUEST FOR JURY TRIAL

Plaintiff hereby requests a trial for jury.

Dated: October 4, 2012

THE ARMENTA LAW FIRM, A.P.C.

By: _____



M. Cris Armenta
Attorneys for Plaintiff
Cindy Lee Garcia

EXHIBIT A

60

EXT. KERO'S TENT - DAY

ME

Kero's wife, Om Roman, is sitting quietly and knitting when Kero enters excitedly.

KERO

Let the house of Kero be joyous.

RAMON

What is wrong with you husband? We do not have that much to be happy for.

KERO

Oh but we do. The Master has asked our daughter's hand in marriage.

RAMON seems concerned.

RAMON

And this make you happy?

KERO

Yes, of course, it makes me very happy! My daughter shall have the stars!

RAMON

Are you crazy? Is your George crazy? Your daughter has not yet reached her 13th year yet. George must be fifty five years old by now!

ABI KERO

He is fifty-three not fifty-five. He has both wealth and power. My daughter shall be his bride whether we say yes or no. And he has promised to make the Caliph of the Bossas after him.

RAMON

Then there is nothing I can do for my poor daughter Hillary. She is not yet thirteen years of age and he is fifty three. What a strange world that we live in... what a strange world.

There is a moment of silence and George enters.

60

60

EXT. KERO'S TENT - DAY

60 .

ME

Kero's wife, Om Roman, is sitting quietly and knitting when Kero enters excitedly.

KERO

Let the house of Kero be joyous.

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RAMON

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There is a moment of silence and George enters.

61

61

EXT. HOUSE OF KERO - DAY

RAMON goes outside to fetch her daughter. Some women are doing chores. She finds the children playing together on the tree swings. She takes Hillary by the hand and goes inside the house.

ADD TO DAY

62

INT. HOUSE OF KERO - DAY

62

KERO
Thank you Master. You bless me by
coming into my humble home.

GEORGE
You are a good man and a good
follower of me Kero. You will be a
good father in law and you shall
indeed have your place in God's
paradise.

KERO
Praise be to God... praise be to
God.

RAMON returns leading Hillary by the hand. She takes her over
to George and puts her hand into George's hand.

RAMON
Hillary this is George, Master. He
is going to be your husband.

George looks at her with that look that only a man can give a
woman as he rubs the back of her hand.

GEORGE
Isn't that wonderful Hillary, my
bride? Praise be to God.

George stands and picks Hillary up in his arms.

GEORGE (CONT'D)
Come, for now you belong to me, to
the Master.

He walks toward the door carrying the girl. Hillary looks
back toward her mother and reaches out a hand. She calls out,
nearly in tears, simply because she does not understand what
just happened.

HILLARY
Mother... Mother... RAMON, I'm
hungry.

RAMON looks at her.

RAMON
It is okay Hillary... every thing
will be alright.

RAMON watches them leave. It is obvious she doesn't believe
her own words. A single tear runs down her cheek.

63

EXT. KERO'S TENT - DAY

63

George carries Hillary outside as the other women are blessing them.

WOMEN

May God bless you both... May God
bless you both.

Hillary is frightened and does not know what is happening.
Once again she calls out to her mother.

HILLARY

Mother... Mother... Mother I'm
hungry.

GEORGE

With me there is no need to be
frightened, my bride.

HILLARY

Where are you taking me?

GEORGE

Wherever I want to go. I am the
Master. Do you not know that my
bride?

George says something in her ear. She slaps him on his face,
but he just laughs.

GEORGE
Kero... did you announce the good news to the bride? I would not be surprised if she has fainted over the good news.

RAMON
I am the only one who came close to fainting.

GEORGE
From joy, of course, my mother in law.

RAMON
Of course, my son in law.

GEORGE
I already knew that or I would not be the Master. Now where is my bride? Where is my beautiful bride, my father in law?

RAMON
She is on the swing with other children, my son in law.

KERO
Go and fetch her woman. Do not keep your soon to be son in law waiting... I mean the Master waiting!

RAMON does as she is told and immediately gets up and heads out the door.

EXHIBIT B

Copyright Office fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov, write the Copyright Office, or call (202) 707-3000.

Privacy Act Notice: Sections 406-410 of title 17 of the United States Code authorize the Copyright Office to collect the personally identifying information requested on this form in order to process the application for copyright registration. By providing this information you are agreeing to routine uses of the information that include publication to give legal notice of your copyright claim as required by 17 U.S.C. §705. It will appear in the Office's online catalog. If you do not provide the information requested, registration may be refused or delayed, and you may not be entitled to certain relief, remedies, and benefits under the copyright law.

Form PA
For a Work of Performing Arts
UNITED STATES COPYRIGHT OFFICE
REGISTRATION NUMBER

PA PAU
EFFECTIVE DATE OF REGISTRATION

Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1 TITLE OF THIS WORK ▼
"Desert Warrior"

PREVIOUS OR ALTERNATIVE TITLES ▼
"Innocence of Muslims"

NATURE OF THIS WORK ▼ See instructions

Audio-visual work, pertaining to Cindy Lee Garcia's dramatic performance in "Desert Warrior" and put on film

2 NAME OF AUTHOR ▼
a Cindy Lee Garcia

Was this contribution to the work a "work made for hire"? ☐ Yes ☒ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country Citizen of U.S.A.

OR Domiciled in

DATES OF BIRTH AND DEATH
Year Born ▼ 1957 Year Died ▼ NA

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No

Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼
Dramatic performance in film entitled "Desert Warriors" affixed to film

NAME OF AUTHOR ▼
b Cindy Lee Garcia

Was this contribution to the work a "work made for hire"? ☐ Yes ☒ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country Citizen of U.S.A.

OR Domiciled in

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No

Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼
Dramatic performance fixed in tangible medium of expression (i.e. film)

NAME OF AUTHOR ▼
c Cindy Lee Garcia

Was this contribution to the work a "work made for hire"? ☐ Yes ☒ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country Citizen of U.S.A.

OR Domiciled in

DATES OF BIRTH AND DEATH
Year Born ▼ 1957 Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No

Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3 YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED
a 2011 Year

This information must be given in all cases.

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK
b Complete this information Month July Day 2 Year 2012
ONLY if this work has been published. only partially published. U.S.A. Nation

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

Cindy Lee Garcia c/o The Armenta Law Firm, 11900 W. Olympic Boulevard, Suite 730, Los Angeles, CA 90064

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

[Ms. Garcia did not sign any work for hire agreement nor a release or relinquishment of her rights when she acted in "Desert Warrior."]

APPLICATION RECEIVED

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

DO NOT WRITE HERE
OFFICE USE ONLY

MORE ON BACK ►

• Complete all applicable spaces (numbers 5-9) on the reverse side of this page
• See detailed instructions
• Sign the form at line 8

DO NOT WRITE HERE

Page 1 of _____ pages

EXAMINED BY _____

FORM PA

CHECKED BY _____

☐ CORRESPONDENCE
 Yes
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COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ▼ If your answer is No, do not check box A, B, or C.
a. ☒ This is the first published edition of a work previously registered in unpublished form.b. ☒ This is the first application submitted by this author as copyright claimant.c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼

Year of Registration ▼

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.
Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

a 6

See instructions
before completing
this space**Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

Garcia gave a dramatic performance for "Desert Warrior" fixed in film in 2011. Since then, the producer of the film altered her performance, dubbing in words she did not say, and changing the film's intent and name to "Innocence of Muslims."

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.
 Name ▼ Account Number ▼

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

M. Cris Armenta, The Armenta Law Firm APC, 11900 W. Olympic Boulevard, Suite 730, Los Angeles, CA 90064

b

Area code and daytime telephone number (310) 826-2826

Fax number (310) 826-5456

Email cris@crisarmenta.com

CERTIFICATION I, the undersigned, hereby certify that I am the

Check only one ▶

- ☒
- author
-
- ☐
- other copyright claimant
-
- ☐
- owner of exclusive right(s)
-
- ☐
- authorized agent of _____

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Cindy Lee Garcia

Date September 25, 2012

Handwritten signature (X) ▼

See attached faxed signature



x

Certificate
will be
mailed in
window
envelope
to this
address:

Name ▼

Number/Street/Apt ▼

City/State/Zip ▼

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

**SEND ALL 3 ELEMENTS
IN THE SAME PACKAGE:**

1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO:
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 Copyright Office-PAD
 101 Independence Avenue SE
 Washington, DC 20559-6230

9

*17 U.S.C. §506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

Office: 2010-357-9930/0.065

TOTAL P.03

EXAMINED BY	FORM 7A
CHECKED BY	
<input type="checkbox"/> CORRESPONDENCE	
<input type="checkbox"/> Yes	

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) If your answer is No, do not check box A, B, or C.

a. This is the first published edition of a work previously registered in unpublished form.

b. This is the first application submitted by this author as copyright claimant.

c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give Previous Registration Number

Year of Registration

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

Garcia gave a dramatic performance for "Desert Warrior" filmed in 2011. Since then, the producer of the film altered her performance, dubbing in words she did not say, and changing the film's intent and name to "Innocence of Muslims."

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name

Account Number

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name / Address / Apt / City / State / Zip

M. Cris Armenta, The Armenta Law Firm APC, 11900 W. Olympic Boulevard, Suite 730, Los Angeles, CA 90064

Area code and daytime telephone number (310) 826-2826

Fax number (310) 826-5456

Email cris@crisarmenta.com

CERTIFICATION I, the undersigned, hereby certify that I am the

Check only one:

- ☒ author
☐ other copyright claimant
☐ owner of exclusive rights
☐ authorized agent of

Name of owner of other copyright claimant, or owner of exclusive rights

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed in printed name and date If this application gives a date of publication in space 6, do not sign and submit it before that date.

Cindy Lee Garcia

Date September 25, 2012

Handwritten signature



x

Certification with be mailed in window envelope to this address:

Name

Number/Room/Box

City/State/Zip

1. Application fee
 2. Nonrefundable filing fee in check or money order payable to Copyright Office
 3. Deposit envelope
 4. Library of Congress
 Copyright Office
 101 Independence Avenue, SE
 Washington, DC 20540-4270

17 U.S.C. § 506(b): Any person who knowingly makes a false statement of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

P.03

SEP-25-2012 13:41

Sent from my iPhone

Begin forwarded message:

From: Copyright Office <cop-rc@loc.gov>
Date: September 25, 2012 1:42:10 PM EDT
To: Cris Armenta <cris@crisarmenta.com>
Subject: Acknowledgement of Receipt

Thank you for submitting your registration claim using the electronic Copyright Office (eCO) System. This email confirms that your application and payment for the work Desert Warrior were received on 09/25/2012. The following applies to registration claims only (not preregistrations):

The effective date of registration is established when the application, payment AND the material being registered have been received. If you have not yet sent the material to be registered, logon to eCO (https://eco.copyright.gov/eService_enu/) and click the blue case number associated with your claim in the Open Cases table, then do one of the following:

Upload a digital copy (if eligible): Click the "Upload Deposit" button at the top of the Case Summary screen, then browse and select the file(s) you wish to upload. Be sure to click the "Upload Complete" button on the Case Summary screen when you have finished uploading your file(s). Note: only certain categories of works are eligible to be registered with digital copies (See FAQs: http://www.copyright.gov/eco/faq.html#eCO_1.4 and <http://www.copyright.gov/eco/help-file-types.html>).

Mail a physical copy(ies): Click the Create Shipping Slip button at the top of the Case Summary screen, then click the Shipping Slip link that appears in the Send By Mail table. Print out and attach the shipping slip to the copy(ies) of your work. For multiple works, be sure to attach shipping slips to the corresponding copies.

A printable copy of the application will be available within 24 hours of its receipt. To access the application, click the My Applications link in the left top most navigation menu of the Home screen.

You will be issued a paper certificate by mail after the registration has been completed. You may check the status of this claim via eCO using this number 1-828151641. [THREAD ID: 1-DP2T9R]

United States Copyright Office

To: David Hardy; Credence Sol; Jason Armstrong
Cc: Heather Rowland
Subject: Fwd: Acknowledgement of Receipt

Heather Rowland

From: Cris Armenta
Sent: Tuesday, September 25, 2012 10:44 AM

Heather Rowland

Subject:

FW: Case# 1-828151641 Cindy Lee Garcia

Attn: Marti/212230

From: ctoinfo [<mailto:ctoinfo@loc.gov>]

Sent: Wednesday, September 26, 2012 11:22 AM

To: Heather Rowland

Cc: ctoinfo

Subject: RE: Case# 1-828151641 Cindy Lee Garcia Attn: Marti/212230

Heather Rowland,

That's fine.

Kind Regards,

Contractor to LOC/Copyright Technology Office

Library of Congress

101 Independence Ave, SE

Washington DC 20540

Office # 202-707-3002

mw

From: Heather Rowland [<mailto:heather@crisarmenta.com>]

Sent: Wednesday, September 26, 2012 2:21 PM

To: ctoinfo

Subject: RE: Case# 1-828151641 Cindy Lee Garcia Attn: Marti/212230

I will mail a copy on DVD/R and it will be to your office tomorrow via FedEx. Does that work?

Thanks,

Heather Rowland

Assistant to M. Cris Armenta

The Armenta Law Firm APC

11900 Olympic Boulevard, Suite 730

Los Angeles, CA 90064

(310) 601-8715 Direct

(310) 384-3548 Cell

(310) 826-5456 Fax

www.crisarmenta.com

From: ctoinfo [<mailto:ctoinfo@loc.gov>]

Sent: Wednesday, September 26, 2012 11:19 AM

To: Heather Rowland

Cc: ctoinfo

Subject: RE: Case# 1-828151641 Cindy Lee Garcia Attn: Marti/212230

Heather Rowland,

It is not recommended that you do both, only one or the other.

The upload feature has been enabled.

Multiple uploads are permitted.

You can either upload your work electronically or send it in by mail. You should log into your account, click on open cases, click on your case number (make sure that your pop-up blocker is off), and you should then see buttons that will give you the option to upload your work electronically or send it by mail. If you want to upload, click on the 'upload deposit' button. A screen should come up (maximize that window) that will allow you to browse for your work and submit it electronically via upload to the Copyright Office. After clicking on the "Upload Deposit" button to upload your files, wait until you have completed uploading ALL of your files **THEN AND ONLY THEN** click on the "Upload Complete" button to complete the process. If you want to send your work by mail you should click on the button to 'create a shipping slip'. It should create a link for a shipping slip that you can click on that will open up the slip. You should print it out and send in with your work.

If you continue to experience problems please phone for assistance.

Kind Regards,

Contractor to LOC/Copyright Technology Office
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101 Independence Ave, SE
Washington DC 20540
Office # 202-707-3002

mw 2122230

From: (310) 826-2826
 Maria Armenta
 The Armenta Law Firm
 11900 Olympic Boulevard

Los Angeles, CA 90064

Origin ID: CIBA

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 CAD: 8678074/NET3300

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Ref # Garcia
 Invoice #
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 Dept #

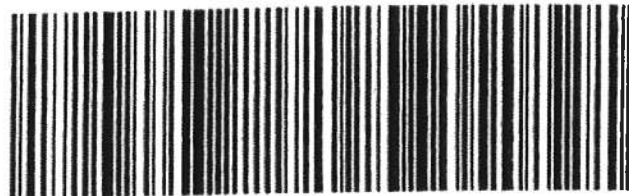
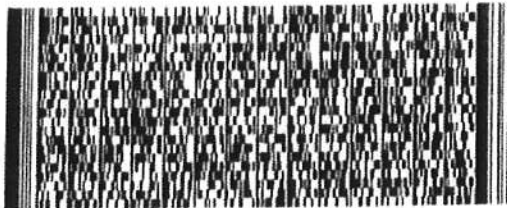
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3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

EXHIBIT C

Cris Armenta

From: david@dmcasolutions.com on behalf of David Hardy
<David.Hardy@DMCASolutions.com>
Sent: Monday, September 24, 2012 12:56 PM
To: debratucker@google.com; copyright@google.com
Cc: Cris Armenta
Subject: DMCA Takedown Request
Attachments: YouTube-Google Takedown Notice (9-24-12).pdf

Dear Ms. Tucker:

Attached please find a Takedown Request prepared and sent to you pursuant to the Digital Millennium Copyright Act, relative to videos of the film identified as "*The Innocence of the Muslims*" that have been posted on YouTube.

I am also faxing a copy of this Takedown Request to you at (650) 872-8513.

Sincerely,

David E. Hardy, President
DMCA Solutions, LLC
(202) 350-0200
David.Hardy@DMCASolutions.com

DMCA Solutions

31 Hastings Street
Mendon, MA 01756

September 24, 2012

Sent by Facsimile & Email

YouTube, LLC
Attn: Debra Tucker, Designated Agent
901 Cherry Avenue
San Bruno, CA
Fax: (650) 872-8513
Email: debratucker@google.com
Email: copyright@google.com

Re: YouTube DMCA Takedown Request: Copyright Infringement
Video – ***The Innocence of the Muslims***

Dear Ms. Tucker:

DMCA Solutions, LLC, acting as agent on behalf of copyright holder Cindy Lee Garcia for the purposes of filing this Takedown Request, hereby submits the following:

What is the Issue:

Copyright Infringement: Cindy Lee Garcia, an actress, has an original copyright that remains vested in her in her audio-visual dramatic performance in a film in which her performance has been altered and adulterated without her consent and posted on YouTube, infringing her copyright.

Copyright Infringement: Who is Affected

Cindy Lee Garcia, the copyright owner

Identification of the Copyrighted Work Claimed to have been Infringed:

Cindy Lee Garcia's audio-visual dramatic performance in a film originally titled *The Desert Warrior* but altered without her consent and posted on YouTube under the title ***The Innocence of the Muslims***.

Identification of the material that is claimed to be infringing

Video posted on YouTube under the title ***The Innocence of Muslims*** but originally titled *The Desert Warrior*

URLs of the Offending Video:

<http://www.youtube.com/watch?v=1nW54iK-7Cs&feature=fvsr>

http://www.youtube.com/watch?v=2Q_tD0BGhy4

http://www.youtube.com/watch?v=fBDTS_YAWyl

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31 Hastings Street
Mendon, MA 01756

<http://www.youtube.com/watch?v=ffVBdyU5ONQ&feature=related>

<http://www.youtube.com/watch?v=FteusCTGO3M>

<http://www.youtube.com/watch?v=HWHajR9IMME>

<http://www.youtube.com/watch?v=i7Smzt607oE>

<http://www.youtube.com/watch?v=i7Smzt607oE&feature=fvsr>

<http://www.youtube.com/watch?v=VnYcWmcYBrw&feature=fvsr>

<http://www.youtube.com/watch?v=X6s8eFkt90Q>

<http://www.youtube.com/watch?v=XKtTIPnZ8iU>

<http://www.youtube.com/watch?v=ypz3kS75bsw>

Copyright Owner's Name: Cindy Lee Garcia

Authorized Agent: DMCA Solutions, LLC
31 Hastings Street
Mendon, MA 01756
USA
(202) 350-0200
David.Hardy@DMCASolutions.com

DMCA Solutions, LLC, has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

The information in this notification is accurate, and under penalty of perjury, DMCA Solutions, LLC, is authorized to act on behalf of Cindy Lee Garcia, the owner of an exclusive right that is infringed.

DMCA Solutions, LLC

By:

A handwritten signature in black ink, appearing to read 'David Hardy', with a large, stylized loop at the end.

David Hardy, President

Cris Armenta

From: david@dmcasolutions.com on behalf of David Hardy
<David.Hardy@DMCASolutions.com>
Sent: Monday, September 24, 2012 6:47 PM
To: debratucker@google.com; copyright@youtube.com
Cc: Cris Armenta
Subject: DMCA Takedown Request #2
Attachments: YouTube - Google Takedown Request #2 (9-24-12).docx

Dear Ms. Tucker:

Attached please find a Takedown Request prepared and sent to you pursuant to the Digital Millennium Copyright Act, relative to videos of the film identified as "*The Innocence of the Muslims*" that have been posted on YouTube.

I am also faxing a copy of this Takedown Request to you at (650) 872-8513.

Sincerely,

David E. Hardy, President
DMCA Solutions, LLC
(202) 350-0200
David.Hardy@DMCASolutions.com

DMCA Solutions

31 Hastings Street
Mendon, MA 01756

September 24, 2012

Sent by Facsimile & Email

YouTube, LLC

Attn: Debra Tucker, Designated Agent

901 Cherry Avenue

San Bruno, CA

Fax: (650) 872-8513

Email: debratucker@google.com

Email: copyright@youtube.com

Re: YouTube DMCA Takedown Request: Copyright Infringement
Video – ***The Innocence of the Muslims*** – Takedown Request #2

Dear Ms. Tucker:

DMCA Solutions, LLC, acting as agent on behalf of copyright holder Cindy Lee Garcia for the purposes of filing this Takedown Request, hereby submits the following:

What is the Issue:

Copyright Infringement: Cindy Lee Garcia, an actress, has an original copyright that remains vested in her in her audio-visual dramatic performance in a film in which her performance has been altered and adulterated without her consent and posted on YouTube, infringing her copyright.

Copyright Infringement: Who is Affected

Cindy Lee Garcia, the copyright owner

Identification of the Copyrighted Work Claimed to have been Infringed:

Cindy Lee Garcia's audio-visual dramatic performance in a film originally titled *The Desert Warrior* but altered without her consent and posted on YouTube under the title ***The Innocence of the Muslims***.

Identification of the material that is claimed to be infringing

Video posted on YouTube under the title ***The Innocence of Muslims*** but originally titled *The Desert Warrior*

URLs of the Offending Video:

<http://www.youtube.com/watch?v=MAiOEV0v2RM>

http://www.youtube.com/watch?v=X_wTvX6-ok4

<http://www.youtube.com/watch?v=xMZcd6UY1s4>

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<http://www.youtube.com/watch?v=X6s8eFkt90Q>

<http://www.youtube.com/watch?v=wdw-cgjH-ZU>

<http://www.youtube.com/watch?v=oLip6P2ksd8>

http://www.youtube.com/watch?v=3dUwhPIAi_Y

<http://www.youtube.com/watch?v=PbX3Caqm960>

<http://www.youtube.com/watch?v=qmodVun16Q4>

<http://www.youtube.com/watch?v=LoBwR9KEGUc&bpctr=1348536278>

<http://www.youtube.com/watch?v=E1ggHpWXvbs>

http://www.youtube.com/watch?v=p_wRkA16SNg

<http://www.youtube.com/watch?v=PbX3Caqm960>

<http://www.youtube.com/watch?v=qmodVun16Q4>

<http://www.youtube.com/watch?v=qmodVun16Q4>

<http://www.youtube.com/watch?v=n20lbnB2XM>

<http://www.youtube.com/watch?v=XIWYZA1MqAA>

http://www.youtube.com/watch?v=SL8hW_ZZaY

<http://www.youtube.com/watch?v=8QTtKQR0PBY>

<http://www.youtube.com/watch?v=jDigtAhMeIY>

Copyright Owner's Name: Cindy Lee Garcia

Authorized Agent: DMCA Solutions, LLC
31 Hastings Street
Mendon, MA 01756
USA
(202) 350-0200
David.Hardy@DMCASolutions.com

DMCA Solutions

31 Hastings Street
Mendon, MA 01756

Page 3

DMCA Solutions, LLC, has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

The information in this notification is accurate, and under penalty of perjury, DMCA Solutions, LLC, is authorized to act on behalf of Cindy Lee Garcia, the owner of an exclusive right that is infringed.

DMCA Solutions, LLC

By:

A handwritten signature in black ink, appearing to read 'David Hardy', with a large circular flourish at the end.

David Hardy, President

Cris Armenta

From: david@dmcasolutions.com on behalf of David Hardy
<David.Hardy@DMCASolutions.com>
Sent: Monday, September 24, 2012 7:23 PM
To: debratucker@google.com; copyright@youtube.com
Cc: Cris Armenta
Subject: DMCA Takedown Request #3 (9-24-12)
Attachments: YouTube-Google Takedown Request #3 (9-24-12).docx

Dear Ms. Tucker:

Attached please find a Takedown Request prepared and sent to you pursuant to the Digital Millennium Copyright Act, relative to videos of the film identified as "*The Innocence of the Muslims*" that have been posted on YouTube.

Sincerely,

David E. Hardy, President
DMCA Solutions, LLC
(202) 350-0200
David.Hardy@DMCASolutions.com

DMCA Solutions

31 Hastings Street
Mendon, MA 01756

September 24, 2012

Sent by Facsimile & Email

YouTube, LLC
Attn: Debra Tucker, Designated Agent
901 Cherry Avenue
San Bruno, CA
Fax: (650) 872-8513
Email: debratucker@google.com
Email: copyright@youtube.com

Re: YouTube DMCA Takedown Request: Copyright Infringement
Video – ***The Innocence of the Muslims*** – Takedown Request #3

Dear Ms. Tucker:

DMCA Solutions, LLC, acting as agent on behalf of copyright holder Cindy Lee Garcia for the purposes of filing this Takedown Request, hereby submits the following:

What is the Issue:

Copyright Infringement: Cindy Lee Garcia, an actress, has an original copyright that remains vested in her in her audio-visual dramatic performance in a film in which her performance has been altered and adulterated without her consent and posted on YouTube, infringing her copyright.

Copyright Infringement: Who is Affected

Cindy Lee Garcia, the copyright owner

Identification of the Copyrighted Work Claimed to have been Infringed:

Cindy Lee Garcia's audio-visual dramatic performance in a film originally titled *The Desert Warrior* but altered without her consent and posted on YouTube under the title ***The Innocence of the Muslims***.

Identification of the material that is claimed to be infringing

Video posted on YouTube under the title ***The Innocence of Muslims*** but originally titled *The Desert Warrior*

URLs of the Offending Video:

<http://www.youtube.com/watch?v=BJqhCKyLOvE>

<http://www.youtube.com/watch?v=vElHfaiK93M>

<http://www.youtube.com/watch?v=YSwi94xfNFE>

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<http://www.youtube.com/watch?v=jDYdlkpgStY>

<http://www.youtube.com/watch?v=IE5McEN4HKA&bpctr=1348538846>

<http://www.youtube.com/watch?v=A2aNEreHzi0>

<http://www.youtube.com/watch?v=YSwi94xfNFE>

<http://www.youtube.com/watch?v=KCD33i3kDkk>

<http://www.youtube.com/watch?v=J-8jcUPpNl>

<http://www.youtube.com/watch?v=GKRHED2RuL0>

<http://www.youtube.com/watch?v=zvxJlVDA5s4>

<http://www.youtube.com/watch?v=LrlfRLh1OJM>

<http://www.youtube.com/watch?v=i7Smzt607oE>

<http://www.youtube.com/watch?v=lutCBSBP0U&bpctr=1348539718>

<http://www.youtube.com/watch?v=ezflX0bU01l>

<http://www.youtube.com/watch?v=CHjLxHRK3Yk>

<http://www.youtube.com/watch?v=-iFHMZGLp48&bpctr=1348539839>

<http://www.youtube.com/watch?v=i7Smzt607oE>

<http://www.youtube.com/watch?v=i7Smzt607oE>

<http://www.youtube.com/watch?v=Vh1G0nV4h-w>

Copyright Owner's Name: Cindy Lee Garcia

Authorized Agent: DMCA Solutions, LLC
31 Hastings Street
Mendon, MA 01756
USA
(202) 350-0200
David.Hardy@DMCASolutions.com

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31 Hastings Street
Mendon, MA 01756

Page 3

DMCA Solutions, LLC, has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

The information in this notification is accurate, and under penalty of perjury, DMCA Solutions, LLC, is authorized to act on behalf of Cindy Lee Garcia, the owner of an exclusive right that is infringed.

DMCA Solutions, LLC

By:

A handwritten signature in black ink, appearing to read 'David Hardy', with a large circular flourish at the end.

David Hardy, President

Cris Armenta

From: david@dmcasolutions.com on behalf of David Hardy
<David.Hardy@DMCASolutions.com>
Sent: Monday, September 24, 2012 10:09 PM
To: debratucker@google.com; copyright@youtube.com
Cc: Cris Armenta
Subject: DMCA Takedown Request #4
Attachments: YouTube-Google Takedown Request #4 (9-24-12).docx

Dear Ms. Tucker:

Attached please find a Takedown Request prepared and sent to you pursuant to the Digital Millennium Copyright Act, relative to videos of the film identified as "*The Innocence of the Muslims*" that have been posted on YouTube.

Sincerely,

David E. Hardy, President
DMCA Solutions, LLC
(202) 350-0200
David.Hardy@DMCASolutions.com

DMCA Solutions

31 Hastings Street
Mendon, MA 01756

September 24, 2012

Sent by Email

YouTube, LLC

Attn: Debra Tucker, Designated Agent

901 Cherry Avenue

San Bruno, CA

Email: debratucker@google.com

Email: copyright@youtube.com

Re: YouTube DMCA Takedown Request: Copyright Infringement
Video – ***The Innocence of the Muslims*** – Takedown Request #4

Dear Ms. Tucker:

DMCA Solutions, LLC, acting as agent on behalf of copyright holder Cindy Lee Garcia for the purposes of filing this Takedown Request, hereby submits the following:

What is the Issue:

Copyright Infringement: Cindy Lee Garcia, an actress, has an original copyright that remains vested in her in her audio-visual dramatic performance in a film in which her performance has been altered and adulterated without her consent and posted on YouTube, infringing her copyright.

Copyright Infringement: Who is Affected

Cindy Lee Garcia, the copyright owner

Identification of the Copyrighted Work Claimed to have been Infringed:

Cindy Lee Garcia's audio-visual dramatic performance in a film originally titled *The Desert Warrior* but altered without her consent and posted on YouTube under the title ***The Innocence of the Muslims***.

Identification of the material that is claimed to be infringing

Video posted on YouTube under the title ***The Innocence of Muslims*** but originally titled *The Desert Warrior*

URLs of the Offending Video:

<http://www.youtube.com/watch?v=1RagKWM8ldk>

http://www.youtube.com/watch?v=1wkyqd9_NtY

<http://www.youtube.com/watch?v=2AJ2ElzJ11w>

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<http://www.youtube.com/watch?v=2lC2wpYa7KE>

http://www.youtube.com/watch?v=2TI9GbNk_gY

<http://www.youtube.com/watch?v=6KJq-rNjLk8>

<http://www.youtube.com/watch?v=6ySE-yYeelE>

<http://www.youtube.com/watch?v=7EmQRlbQbJk>

<http://www.youtube.com/watch?v=7qcFACwfil8>

<http://www.youtube.com/watch?v=8jYrk--UFh0>

<http://www.youtube.com/watch?v=A1ezRBS5Jhs>

<http://www.youtube.com/watch?v=a5gABvYSbis>

<http://www.youtube.com/watch?v=ADdj48gHKGQ>

http://www.youtube.com/watch?v=AQqqy6_RiD0

<http://www.youtube.com/watch?v=Ar3iu0D81Lg>

<http://www.youtube.com/watch?v=B-pGehBwKFY>

<http://www.youtube.com/watch?v=BGYNJmlaEbk>

<http://www.youtube.com/watch?v=bkplXBnFT3c>

<http://www.youtube.com/watch?v=BMhwVq4jmO8>

<http://www.youtube.com/watch?v=BPQM2nfVyz0>

<http://www.youtube.com/watch?v=bYaKOBkd4io>

<http://www.youtube.com/watch?v=C7KeGApikUs>

<http://www.youtube.com/watch?v=dAaDPAnlvx0>

<http://www.youtube.com/watch?v=DizesXXwUiU>

<http://www.youtube.com/watch?v=dx3z4ly5Exs>

<http://www.youtube.com/watch?v=EHby-g7KgC0>

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<http://www.youtube.com/watch?v=engQ9MX4Cyc>

<http://www.youtube.com/watch?v=eqQ74At3Psc>

<http://www.youtube.com/watch?v=fAMCA7JdQYk>

<http://www.youtube.com/watch?v=fm3P9mEi3Xk>

<http://www.youtube.com/watch?v=FsC7yHse-iQ>

<http://www.youtube.com/watch?v=gORgR7UiXgY>

<http://www.youtube.com/watch?v=h2MHczJyFNQ>

<http://www.youtube.com/watch?v=HDeWjf877yw>

<http://www.youtube.com/watch?v=HkGOubHiT6I>

<http://www.youtube.com/watch?v=HR0Vj-8dqTM>

<http://www.youtube.com/watch?v=Hv4HwUQS-yY>

<http://www.youtube.com/watch?v=IDK2yl6U48M>

<http://www.youtube.com/watch?v=Jslqig3VkrE>

<http://www.youtube.com/watch?v=K3IAgMuNj0A>

<http://www.youtube.com/watch?v=kAQ5onF0Lc4>

http://www.youtube.com/watch?v=Lgx1_JVxfZE

<http://www.youtube.com/watch?v=IhBoPXEPUsQ>

<http://www.youtube.com/watch?v=Ln3VAwuLxCE>

<http://www.youtube.com/watch?v=mjoa3QazVy8>

<http://www.youtube.com/watch?v=n8s6bYHELaw>

<http://www.youtube.com/watch?v=NggEJ5PTPbw>

<http://www.youtube.com/watch?v=NuOFer5WqYo>

<http://www.youtube.com/watch?v=o3ev9m4ApdY>

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Mendon, MA 01756

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<http://www.youtube.com/watch?v=o7RQqavrd0E>

<http://www.youtube.com/watch?v=O8Wc5PsXmPo>

<http://www.youtube.com/watch?v=Oqzib6N0wE8>

<http://www.youtube.com/watch?v=ov9bd23F1yA>

<http://www.youtube.com/watch?v=q26i0VLRbQE>

<http://www.youtube.com/watch?v=qf-44Q3SV0Y>

<http://www.youtube.com/watch?v=Qi3sDuWPvos>

http://www.youtube.com/watch?v=QOcQvZ_UNwU

<http://www.youtube.com/watch?v=rKOa87wgPp4>

<http://www.youtube.com/watch?v=SIPLKwpV6NE>

<http://www.youtube.com/watch?v=sXKyPPgrMi4>

<http://www.youtube.com/watch?v=tHpacSiAI9U>

<http://www.youtube.com/watch?v=tRa9L5OPS0M>

<http://www.youtube.com/watch?v=tRBGBGDZj7o>

<http://www.youtube.com/watch?v=tvV6p5IHDLM>

<http://www.youtube.com/watch?v=UDd6bine9io>

<http://www.youtube.com/watch?v=v5TBXoKErus>

<http://www.youtube.com/watch?v=Vh5LEJNE70c>

<http://www.youtube.com/watch?v=vNZW4KCPURQ>

<http://www.youtube.com/watch?v=vYnwZeZ8p8Y>

<http://www.youtube.com/watch?v=W1MYyfCq2X4>

<http://www.youtube.com/watch?v=WI8FoYpglNw>

<http://www.youtube.com/watch?v=XKtTlPnZ8iU>

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31 Hastings Street
Mendon, MA 01756

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<http://www.youtube.com/watch?v=xLxzfOPDMIo>

<http://www.youtube.com/watch?v=xYVfBNKbfRQ>

http://www.youtube.com/watch?v=YFogvC4_zgY

<http://www.youtube.com/watch?v=zx-j8lzx6dQ>

<http://www.youtube.com/watch?v=WCCdyRzC2A>

<http://www.youtube.com/watch?v=yGsQ0fuaXA>

Copyright Owner's Name: Cindy Lee Garcia

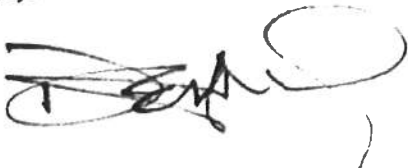
Authorized Agent: DMCA Solutions, LLC
31 Hastings Street
Mendon, MA 01756
USA
(202) 350-0200
David.Hardy@DMCASolutions.com

DMCA Solutions, LLC, has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

The information in this notification is accurate, and under penalty of perjury, DMCA Solutions, LLC, is authorized to act on behalf of Cindy Lee Garcia, the owner of an exclusive right that is infringed.

DMCA Solutions, LLC

By:

A handwritten signature in black ink, appearing to read 'David Hardy', with a large circular flourish at the end.

David Hardy, President

Cris Armenta

From: david@dmcasolutions.com on behalf of David Hardy
<David.Hardy@DMCASolutions.com>
Sent: Tuesday, September 25, 2012 10:05 AM
To: debratucker@google.com; copyright@youtube.com
Cc: Cris Armenta
Subject: DMCA Takedown Request #5
Attachments: YouTube-Google Takedown Request #5 (9-25-12).docx

Dear Ms. Tucker:

Attached please find a Takedown Request prepared and sent to you pursuant to the Digital Millennium Copyright Act, relative to videos of the film identified as "*The Innocence of the Muslims*" that have been posted on YouTube.

Sincerely,

David E. Hardy, President
DMCA Solutions, LLC
(202) 350-0200
David.Hardy@DMCASolutions.com

DMCA Solutions

31 Hastings Street
Mendon, MA 01756

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<http://www.youtube.com/watch?v=9dqHt6gsoxU>
<http://www.youtube.com/watch?v=NQ5UAralcWE>
<http://www.youtube.com/watch?v=XxlaQKqiRLY>
<http://www.youtube.com/watch?v=DdOUoGfHg-l>
http://www.youtube.com/watch?v=7Ojxb_VkHAs
<http://www.youtube.com/watch?v=ns0rQ-dZC0>
<http://www.youtube.com/watch?v=TGB24q8K97w>
<http://www.youtube.com/watch?v=YPVxQ3NDMPk>
<http://www.youtube.com/watch?v=YBISPSxUS5E>
<http://www.youtube.com/watch?v=Rdh8ayz0B-Y>
<http://www.youtube.com/watch?v=eeO3MEi8s38>
http://www.youtube.com/watch?v=DmVg_j4-0wk
<http://www.youtube.com/watch?v=oMR0cUljTE8>
<http://www.youtube.com/watch?v=YQ1w6HA3154>
<http://www.youtube.com/watch?v=QnMQ8k-4VgY>
<http://www.youtube.com/watch?v=G16J4zFn5VI>
<http://www.youtube.com/watch?v=FTH0P746SJQ>
<http://www.youtube.com/watch?v=sOolJyq03Wk>
<http://www.youtube.com/watch?v=SB28D9KITkc>
<http://www.youtube.com/watch?v=6Bn5SkIxb1A>
<http://www.youtube.com/watch?v=T2wsrTi3i4o>
<http://www.youtube.com/watch?v=TJyCUUfMCDI>
http://www.youtube.com/watch?v=Tt_nkMCCP_xk

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31 Hastings Street
Mendon, MA 01756

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<http://www.youtube.com/watch?v=GKi8pna53hg>
<http://www.youtube.com/watch?v=AP3Yg5vJNK0>
<http://www.youtube.com/watch?v=obe0PmyW6Ek>
<http://www.youtube.com/watch?v=1KMsSiBdplQ>
<http://www.youtube.com/watch?v=vP2soXU7quM>
<http://www.youtube.com/watch?v=dXEM4EmB2sM>
<http://www.youtube.com/watch?v=1ryHcwXjib0>
http://www.youtube.com/watch?v=G3g_R-RovR8
<http://www.youtube.com/watch?v=Yyk9ghudS5w>
<http://www.youtube.com/watch?v=w9zatob4YxY>
http://www.youtube.com/watch?v=s_AOeKOGql0
<http://www.youtube.com/watch?v=yW-fXw1EKXc>
<http://www.youtube.com/watch?v=UEZhWm2oK9k>
<http://www.youtube.com/watch?v=hftuDpFP4Wl>
<http://www.youtube.com/watch?v=4midXCjFO-Q>

Copyright Owner's Name: Cindy Lee Garcia

Authorized Agent: DMCA Solutions, LLC
31 Hastings Street
Mendon, MA 01756
USA
(202) 350-0200
David.Hardy@DMCA Solutions.com

DMCA Solutions

31 Hastings Street
Mendon, MA 01756

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DMCA Solutions, LLC, has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

The information in this notification is accurate, and under penalty of perjury, DMCA Solutions, LLC, is authorized to act on behalf of Cindy Lee Garcia, the owner of an exclusive right that is infringed.

DMCA Solutions, LLC

By:

A handwritten signature in black ink, appearing to read 'David Hardy', with a large circular flourish at the end.

David Hardy, President