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2 Titus Lee Barnes
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7 In Pro se
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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13

14 Julian Barnes Aka
15 Titus Lee Barnes

16 Plaintiff(s),

17 vs.

18 Jasmine Sanchez, Angelo Sanchez, and
19 YouTube, LLC

20 Defendant(s).
21
22
23

Case No.: 5:25-cv-05901-VKD

FIRST AMENDED COMPLAINT

COPYRIGHT INFRINGEMENT
17 U.S.C. § 501.

DEMAND FOR JURY TRIAL

24
25 **PARTIES**
26

27 1. Plaintiff.

28 Name: Julian Barnes Aka Titus Lee Barnes

1 Address: 1700 McHenry Avenue Ste 65B #114

2 Modesto, Ca. 95350

3 Telephone: (209)501-3462

4 Email: barnestlee@gmail.com

5
6 2. Defendants.

7 **Defendant 1:**

8 Name: Jasmine Sanchez

9 3728 Saint Charles Way

10 Orange Park, Fl. 32065

11 Telephone: (347)364-1701

12 Email: ghettoscholars@gmail.com

13 **Defendant 2:**

14 Angelo Sanchez

15 3728 Saint Charles Way

16 Orange Park, Fl. 32065

17 Telephone: (347)364-1701

18 Email: evilstreetsmedia@gmail.com

19 **Defendant 3:**

20 Name: YouTube, LLC.

21 Address: 901 Cherry Avenue, San Bruno, Ca. 94066

22 Telephone: (650) 253-0000

23 **JURISDICTION**

- 24 3. The court has jurisdiction over the plaintiff's claims of violations of his constitutional rights
25 under 28 U.S.C. § 1331, in that this is a civil action arising under the Constitution of the
26 United States. Jurisdiction of the Court is invoked pursuant to 28 U.S.C. § 1343(a)(1) in that
27 this action seeks to recover damages for injury to this person or property.

28 **VENUE**

- 1 4. Venue is proper in this court under 28 U.S.C. § 1391(b)(2) because it is a judicial district
2 which a substantial part of the events or omissions giving rise to the claim occurred, or a
3 substantial part of the property that is subject of the action is situated.

4 **INTRADISTRICT ASSIGNMENT**

- 5 5. Pursuant to local rule 3-2(c) and (e), this action is properly assigned to the San Jose Division
6 because a substantial amount of the events or omissions giving rise to the claims occurred in
7 Santa Clara County.

8
9 **STATEMENT OF FACTS**

- 10 6. On or about April 17, 2025, defendant(s) Jasmine Sanchez and Angelo Sanchez were the
11 operators/account holders of the Evil Streets TV channel on YouTube that displayed a
12 thirty-seven minute, and five-second video titled, Meet Oakland's LEGENDARY
13 GANGSTER Felix "The Cat" Mitchell. During the performance and display of this video
14 defendants, hereafter Jasmine Sanchez and Angelo Sanchez narrated, reproduced and
15 transmitted chapter one "Big Fee" of Drug Lords of Oakland by Titus Lee Barnes and
16 displayed copyrighted photographs while running b-roll film footage in tandem with the
17 narration of Titus Lee Barnes book content.
- 18 7. On or about May 19, 2025, defendant(s) Jasmine Sanchez and Angelo Sanchez were the
19 operators/account holders of the Evil Streets TV channel on YouTube that displayed a
20 twenty-two minute, and twenty-nine second video titled, Meet Oakland's LEGENDARY
21 KINGPIN Harvey "Funktown Harv" Whisenton. During the performance and display of this
22 video defendants, Jasmine Sanchez and Angelo Sanchez narrated, reproduced and
23 transmitted chapter three "Funktown Harv" of Drug Lords of Oakland by Titus Lee Barnes
24 and displayed copyrighted photographs while running b-roll film footage in tandem with the
25 narration of Titus Lee Barnes book content. This video was published complete with a
26 caption stating the following: [Information for this video was obtained from Drug Lords of
27 Oakland by Titus Lee Barnes].
28

- 1 8. On or about May 22, 2025, Jasmine Sanchez and Angelo Sanchez were the
2 operators/account holders of the Evil Streets TV channel on YouTube that displayed a (FILL
3 IN) video titled, Meet Oakland's LEGENDARY KINGPIN Harvey "Funktown Harv"
4 Whisenton. During the performance and display of this video defendants, Jasmine Sanchez
5 and Angelo Sanchez narrated, reproduced and transmitted chapter two "Mick Mo" of Drug
6 Lords of Oakland by Titus Lee Barnes and displayed copyrighted photographs while
7 running b-roll film footage in tandem with the narration of Titus Lee Barnes book content.
8 This video was published complete with a caption stating the following: [Information for
9 this video was obtained from Drug Lords of Oakland by Titus Lee Barnes].
- 10 9. On or about May 24, 2025, Jasmine Sanchez and Angelo Sanchez were the
11 operators/account holders of the Evil Streets TV channel on YouTube that displayed a
12 twenty-two minute, and sixteen-second video titled, Meet Oakland's LEGENDARY
13 KINGPIN Rudolph "Big Rudy" Henderson. During the performance and display of this
14 video Jasmine Sanchez and Angelo Sanchez narrated, reproduced and transmitted chapter
15 four "Big Rudy" of Drug Lords of Oakland by Titus Lee Barnes and displayed copyrighted
16 photographs while running b-roll film footage in tandem with the narration of Titus Lee
17 Barnes book content. This video was published complete with a caption stating the
18 following: [Information for this video was obtained from Drug Lords of Oakland by Titus
19 Lee Barnes].
- 20 10. On or about May 25, 2025, Jasmine Sanchez and Angelo Sanchez were the
21 operators/account holders of the Evil Streets TV channel on YouTube that displayed a video
22 titled, Meet Oakland's LEGENDARY KINGPIN Daryll "Lil D" Reed. During the
23 performance and display of this video Jasmine Sanchez and Angelo Sanchez narrated,
24 reproduced and transmitted chapter six "Lil D" of Drug Lords of Oakland by Titus Lee
25 Barnes and displayed copyrighted photographs while running b-roll film footage in tandem
26 with the narration of Titus Lee Barnes book content.
- 27 11. On or about April 1, 2025, Jasmine Sanchez and Angelo Sanchez were the operators/account
28 holders of the Evil Streets TV channel on YouTube that displayed a video titled, Meet

1 Oakland's LEGENDARY KINGPIN Larry Lorenzo Parker. During the performance and
2 display of this video Jasmine Sanchez and Angelo Sanchez narrated, reproduced and
3 transmitted chapter five "Larry P" of Drug Lords of Oakland by Titus Lee Barnes and
4 displayed copyrighted photographs while running b-roll film footage in tandem with the
5 narration of Titus Lee Barnes book content.

6 12. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
7 operators/account holders of the Evil Streets TV channel on YouTube that displayed a video
8 titled, Meet LEGENDARY KINGPIN Timothy "Black" Bluitt. During the performance and
9 display of this video Jasmine Sanchez and Angelo Sanchez narrated, reproduced and
10 transmitted chapter seven "Black" of Drug Lords of Oakland by Titus Lee Barnes and
11 displayed copyrighted photographs while running b-roll film footage in tandem with the
12 narration of Titus Lee Barnes book content.

13 13. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
14 operators/account holders of the Evil Streets TV channel on YouTube that displayed a video
15 titled, Meet Oakland's LEGENDARY OAKLAND KINGPIN Anthony "Ant" Flowers.
16 During the performance and display of this video Jasmine Sanchez and Angelo Sanchez
17 narrated, reproduced and transmitted chapter eight "Ant" of Drug Lords of Oakland by Titus
18 Lee Barnes and displayed copyrighted photographs while running b-roll film footage in
19 tandem with the narration of Titus Lee Barnes book content.

20 14. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
21 operators/account holders of the Evil Streets TV channel on YouTube that displayed a video
22 titled, Meet LEGENDARY OAKLAND KINGPIN Kevin "Slow Motion" Davis. During the
23 performance and display of this video Jasmine Sanchez and Angelo Sanchez narrated,
24 reproduced and transmitted chapter nine "Slow Motion" of Drug Lords of Oakland by Titus
25 Lee Barnes and displayed copyrighted photographs while running b-roll film footage in
26 tandem with the narration of Titus Lee Barnes book content.

27 15. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
28 operators/account holders of the Evil Streets TV channel on YouTube that displayed a

1 video titled, Meet LEGENDARY OAKLAND KINGPIN James “Hollyrock” Holloway.
2 During the performance and display of this video Jasmine Sanchez and Angelo Sanchez
3 narrated, reproduced and transmitted chapter ten “Hollyrock” of Drug Lords of Oakland by
4 Titus Lee Barnes and displayed copyrighted photographs while running b-roll film footage
5 in tandem with the narration of Titus Lee Barnes book content.

6 16. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
7 operators/account holders of the Evil Streets TV channel on YouTube that displayed two
8 videos titled, Meet Oakland’s LEGENDARY KINGPIN Charles Cosby (Part 1 and Part 2).
9 During the performance and display of this video Jasmine Sanchez and Angelo Sanchez
10 narrated, reproduced and transmitted chapter eleven “Brookfield Charles” of Drug Lords of
11 Oakland by Titus Lee Barnes and displayed copyrighted photographs while running b-roll
12 film footage in tandem with the narration of Titus Lee Barnes book content.

13 17. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
14 operators/account holders of the Evil Streets TV channel on YouTube that displayed a video
15 titled, Meet LEGENDARY OAKLAND KINGPIN Derlin “D Folks” Hines. During the
16 performance and display of this video Jasmine Sanchez and Angelo Sanchez narrated,
17 reproduced and transmitted chapter twelve “D Folks” of Drug Lords of Oakland by Titus
18 Lee Barnes and displayed copyrighted photographs while running b-roll film footage in
19 tandem with the narration of Titus Lee Barnes book content.

20 18. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
21 operators/account holders of the Evil Streets TV channel on YouTube that displayed a video
22 titled, Meet LEGENDARY OAKLAND KINGPIN “Maestro”. During the performance and
23 display of this video Jasmine Sanchez and Angelo Sanchez narrated, reproduced and
24 transmitted chapter thirteen “Maestro” of Drug Lords of Oakland by Titus Lee Barnes and
25 displayed copyrighted photographs while running b-roll film footage in tandem with the
26 narration of Titus Lee Barnes book content.

27 19. On or about May 25, 2025, Jasmine Sanchez and Angelo Sanchez were the
28 operators/account holders of the Evil Streets TV channel on YouTube that displayed a video

1 titled, Meet LEGENDARY OAKLAND KINGPIN “Cuzzo Kev”. During the performance
 2 and display of this video Jasmine Sanchez and Angelo Sanchez narrated, reproduced and
 3 transmitted chapter fourteen “Cuzzo Kev” of Drug Lords of Oakland by Titus Lee Barnes
 4 and displayed copyrighted photographs while running b-roll film footage in tandem with the
 5 narration of Titus Lee Barnes book content.

6 20. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
 7 operators/account holders of the Evil Streets TV channel on YouTube that displayed a video
 8 titled, Meet LEGENDARY OAKLAND KINGPIN Demetrius “Dark Dude” Barker. During
 9 the performance and display of this video Jasmine Sanchez and Angelo Sanchez narrated,
 10 reproduced and transmitted chapter fifteen “Dark Dude” of Drug Lords of Oakland by Titus
 11 Lee Barnes and displayed copyrighted photographs while running b-roll film footage in
 12 tandem with the narration of Titus Lee Barnes book content.

13 CLAIMS

14 First Claim

15 17 U.S.C. § 501.

16 COPYRIGHT INFRINGEMENT

17 Jasmine Sanchez, Angelo Sanchez, and YouTube, LLC.

18 21. Plaintiff incorporates by reference, realleges as thoroughly set forth herein the paragraphs
 19 21-40.

20 22. The actions of Jasmine Sanchez and Angelo Sanchez, directly and contributively infringed
 21 upon the registered copyright of the plaintiff and violated the rights, privileges and
 22 immunities secured to the plaintiff under the statutory provisions of 17 U.S.C § 501. During
 23 all times mentioned herein, Jasmine Sanchez and Angelo Sanchez, and each of them,
 24 separately and in concert, acted illegitimately, creating a secondary market for plaintiffs’
 25 “material” in the form of his copyright and book Drug Lords of Oakland that facilitated the
 26 violation of the terms of service therein.

27 23. YouTube, LLC., (hereinafter, YouTube) during all times mentioned in this claim is the
 28 Internet Service Provider (ISP) responsible for the transmission of Evil Streets TV on their

1 multimedia platform. Pursuant to Section 512(c) of the DMCA (17 U.S.C. § 512(c)), which
2 covers the storage of infringing material, does not protect an Internet Service Provider (ISP)
3 if they receive a direct financial benefit attributable to the infringing activity and have the
4 right and ability to control it. YouTube benefitted directly from the infringing activity of
5 Evil Streets TV via the YouTube Partner Program while Jasmine Sanchez and Angelo
6 Sanchez infringed upon plaintiffs registered copyright during the performance and display of
7 the following videos listed below:

8 24. [On or about April 17, 2025, defendant(s) Jasmine Sanchez and Angelo Sanchez were the
9 operators/account holders of the Evil Streets TV channel on YouTube that displayed a
10 thirty-seven minute, and five-second video titled, Meet Oakland's LEGENDARY
11 GANGSTER Felix "The Cat" Mitchell. During the performance and display of this video
12 defendants, hereafter Jasmine Sanchez and Angelo Sanchez narrated, reproduced and
13 transmitted chapter one "Big Fee" of Drug Lords of Oakland by Titus Lee Barnes and
14 displayed copyrighted photographs while running b-roll film footage in tandem with the
15 narration of Titus Lee Barnes book content.
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17 25. On or about May 19, 2025, defendant(s) Jasmine Sanchez and Angelo Sanchez were the
18 operators/account holders of the Evil Streets TV channel on YouTube that displayed a
19 twenty-two minute, and twenty-nine second video titled, Meet Oakland's LEGENDARY
20 KINGPIN Harvey "Funktown Harv" Whisenton. During the performance and display of this
21 video defendants, Jasmine Sanchez and Angelo Sanchez narrated, reproduced and
22 transmitted chapter three "Funktown Harv" of Drug Lords of Oakland by Titus Lee Barnes
23 and displayed copyrighted photographs while running b-roll film footage in tandem with the
24 narration of Titus Lee Barnes book content. This video was published complete with a
25 caption stating the following: [Information for this video was obtained from Drug Lords of
26 Oakland by Titus Lee Barnes].
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1 26. On or about May 22, 2025, Jasmine Sanchez and Angelo Sanchez were the
2 operators/account holders of the Evil Streets TV channel on YouTube that displayed a (FILL
3 IN) video titled, Meet Oakland's LEGENDARY KINGPIN Harvey "Funktown Harv"
4 Whisenton. During the performance and display of this video defendants, Jasmine Sanchez
5 and Angelo Sanchez narrated, reproduced and transmitted chapter two "Mick Mo" of Drug
6 Lords of Oakland by Titus Lee Barnes and displayed copyrighted photographs while
7 running b-roll film footage in tandem with the narration of Titus Lee Barnes book content.
8 This video was published complete with a caption stating the following: [Information for
9 this video was obtained from Drug Lords of Oakland by Titus Lee Barnes].
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11 27. On or about May 24, 2025, Jasmine Sanchez and Angelo Sanchez were the
12 operators/account holders of the Evil Streets TV channel on YouTube that displayed a
13 twenty-two minute, and sixteen-second video titled, Meet Oakland's LEGENDARY
14 KINGPIN Rudolph "Big Rudy" Henderson. During the performance and display of this
15 video Jasmine Sanchez and Angelo Sanchez narrated, reproduced and transmitted chapter
16 four "Big Rudy" of Drug Lords of Oakland by Titus Lee Barnes and displayed copyrighted
17 photographs while running b-roll film footage in tandem with the narration of Titus Lee
18 Barnes book content. This video was published complete with a caption stating the
19 following: [Information for this video was obtained from Drug Lords of Oakland by Titus
20 Lee Barnes].
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23 28. On or about May 25, 2025, Jasmine Sanchez and Angelo Sanchez were the
24 operators/account holders of the Evil Streets TV channel on YouTube that displayed a (FILL
25 IN) video titled, Meet Oakland's LEGENDARY KINGPIN Daryll "Lil D" Reed. During the
26 performance and display of this video Jasmine Sanchez and Angelo Sanchez narrated,
27 reproduced and transmitted chapter six "Lil D" of Drug Lords of Oakland by Titus Lee
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1 Barnes and displayed copyrighted photographs while running b-roll film footage in tandem
2 with the narration of Titus Lee Barnes book content.

3 29. On or about April 1, 2025, Jasmine Sanchez and Angelo Sanchez were the operators/account
4 holders of the Evil Streets TV channel on YouTube that displayed a (FILL IN) video titled,
5 Meet Oakland's LEGENDARY KINGPIN Larry Lorenzo Parker. During the performance
6 and display of this video Jasmine Sanchez and Angelo Sanchez narrated, reproduced and
7 transmitted chapter five "Larry P" of Drug Lords of Oakland by Titus Lee Barnes and
8 displayed copyrighted photographs while running b-roll film footage in tandem with the
9 narration of Titus Lee Barnes book content.
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11 30. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
12 operators/account holders of the Evil Streets TV channel on YouTube that displayed a (FILL
13 IN-VIDEO LENGTH) video titled, Meet LEGENDARY KINGPIN Timothy "Black" Bluitt.
14 During the performance and display of this video Jasmine Sanchez and Angelo Sanchez
15 narrated, reproduced and transmitted chapter seven "Black" of Drug Lords of Oakland by
16 Titus Lee Barnes and displayed copyrighted photographs while running b-roll film footage
17 in tandem with the narration of Titus Lee Barnes book content.
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19 31. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
20 operators/account holders of the Evil Streets TV channel on YouTube that displayed a (FILL
21 IN) video titled, Meet Oakland's LEGENDARY OAKLAND KINGPIN Anthony "Ant"
22 Flowers. During the performance and display of this video Jasmine Sanchez and Angelo
23 Sanchez narrated, reproduced and transmitted chapter eight "Ant" of Drug Lords of Oakland
24 by Titus Lee Barnes and displayed copyrighted photographs while running b-roll film
25 footage in tandem with the narration of Titus Lee Barnes book content.
26

27 32. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
28 operators/account holders of the Evil Streets TV channel on YouTube that displayed a (FILL

1 IN) video titled, Meet LEGENDARY OAKLAND KINGPIN Kevin “Slow Motion” Davis.

2 During the performance and display of this video Jasmine Sanchez and Angelo Sanchez
3 narrated, reproduced and transmitted chapter nine “Slow Motion” of Drug Lords of Oakland
4 by Titus Lee Barnes and displayed copyrighted photographs while running b-roll film
5 footage in tandem with the narration of Titus Lee Barnes book content.
6

7 33. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
8 operators/account holders of the Evil Streets TV channel on YouTube that displayed a (FILL
9 IN) video titled, Meet LEGENDARY OAKLAND KINGPIN James “Hollyrock” Holloway.

10 During the performance and display of this video Jasmine Sanchez and Angelo Sanchez
11 narrated, reproduced and transmitted chapter ten “Hollyrock” of Drug Lords of Oakland by
12 Titus Lee Barnes and displayed copyrighted photographs while running b-roll film footage
13 in tandem with the narration of Titus Lee Barnes book content.
14

15 34. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
16 operators/account holders of the Evil Streets TV channel on YouTube that displayed two
17 videos (FILL IN) titled, Meet Oakland’s LEGENDARY KINGPIN Charles Cosby (Part 1
18 and Part 2). During the performance and display of this video Jasmine Sanchez and Angelo
19 Sanchez narrated, reproduced and transmitted chapter eleven “Brookfield Charles” of Drug
20 Lords of Oakland by Titus Lee Barnes and displayed copyrighted photographs while
21 running b-roll film footage in tandem with the narration of Titus Lee Barnes book content.
22

23 35. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
24 operators/account holders of the Evil Streets TV channel on YouTube that displayed a (FILL
25 IN) video titled, Meet LEGENDARY OAKLAND KINGPIN Derlin “D Folks” Hines.

26 During the performance and display of this video Jasmine Sanchez and Angelo Sanchez
27 narrated, reproduced and transmitted chapter twelve “D Folks” of Drug Lords of Oakland by
28

1 Titus Lee Barnes and displayed copyrighted photographs while running b-roll film footage
2 in tandem with the narration of Titus Lee Barnes book content.

3 36. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
4 operators/account holders of the Evil Streets TV channel on YouTube that displayed a (FILL
5 IN) video titled, Meet LEGENDARY OAKLAND KINGPIN “Maestro”. During the
6 performance and display of this video Jasmine Sanchez and Angelo Sanchez narrated,
7 reproduced and transmitted chapter thirteen “Maestro” of Drug Lords of Oakland by Titus
8 Lee Barnes and displayed copyrighted photographs while running b-roll film footage in
9 tandem with the narration of Titus Lee Barnes book content.
10

11 37. On or about May 25, 2025, Jasmine Sanchez and Angelo Sanchez were the
12 operators/account holders of the Evil Streets TV channel on YouTube that displayed a (FILL
13 IN) video titled, Meet LEGENDARY OAKLAND KINGPIN “Cuzzo Kev”. During the
14 performance and display of this video Jasmine Sanchez and Angelo Sanchez narrated,
15 reproduced and transmitted chapter fourteen “Cuzzo Kev” of Drug Lords of Oakland by
16 Titus Lee Barnes and displayed copyrighted photographs while running b-roll film footage
17 in tandem with the narration of Titus Lee Barnes book content.
18

19 38. On or about August 1, 2025, Jasmine Sanchez and Angelo Sanchez were the
20 operators/account holders of the Evil Streets TV channel on YouTube that displayed a (FILL
21 IN) video titled, Meet LEGENDARY OAKLAND KINGPIN Demetrius “Dark Dude”
22 Barker. During the performance and display of this video Jasmine Sanchez and Angelo
23 Sanchez narrated, reproduced and transmitted chapter fifteen “Dark Dude” of Drug Lords of
24 Oakland by Titus Lee Barnes and displayed copyrighted photographs while running b-roll
25 film footage in tandem with the narration of Titus Lee Barnes book content.
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1 39. Plaintiff is now suffering and will continue to suffer irreparable harm and monetary
2 damages as a result of defendants, each one of them and their volitional conduct and
3 infringing activities unless and until this court grants relief].
4

5 40. YouTube is being sued in their individual capacity. YouTube, LLC., is the ISP responsible
6 for the infringement of the book Drug Lords of Oakland by Titus Lee Barnes, copyright
7 # TX 8-646-340. YouTube financially benefitted from the monetization of Evil Streets TV
8 via 1. Ad based and 2. Subscription based models. Therefore, YouTube shares vicarious
9 liability for the injuries suffered in the form of a secondary market created by the actions of
10 Jasmine Sanchez and Angelo Sanchez that took place on their platform. Also, plaintiff
11 alleges that YouTube controlled the ISP on which Evil Streets formerly uploaded,
12 transmitted, performed and displayed the infringing material. Therefore, YouTube directly
13 and contributively infringed upon the registered copyright of the plaintiff and violated the
14 rights, privileges and immunities secured to the plaintiff under the statutory provisions of 17
15 U.S.C § 501. Copyright infringement.
16

17 YouTube is not protected by the DMCA Section 512(c) safe harbor because it fails the
18 “financial benefit directly attributable to infringing activity,” test. By enrolling Evil Streets
19 TV in the YouTube Partner Program, YouTube directly profited from ad revenue generated
20 by infringing content, while maintaining the “right and ability to control” such content
21 through its uploading and monetization algorithms, thus establishing vicarious copyright
22 infringement liability. A) The Safe Harbor Limitation: Section 512(c) only protects ISPs that
23 do not have actual knowledge of infringement and do not receive direct financial benefit
24 from it. B) Direct Financial Benefit: The YouTube Partner Program means YouTube takes a
25 percentage of revenue from videos. If those videos are infringing, YouTube is directly
26 profiting from that specific illegal activity. C) Right and Ability to Control: YouTube
27
28

1 provides the tools, controls the monetization (Partner Program), and has the ability to
2 remove content, meeting the criteria for vicarious liability. D) The "Evil Streets TV"
3 Factor: By actively partnering with a channel engaged in infringing activity rather than
4 simply acting as a passive host, YouTube assumes liability.
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10 **DEMAND FOR RELIEF**

11 [State what you want the Court to do. Depending on your claims, you may ask the Court to award
12 you money or order the defendant to do something or stop doing something. If you are asking for
13 money, you can say how much you are asking for and why you should get that amount, or describe
14 the different kinds of harm caused by the defendant.]

15 **WHEREFORE**, plaintiff requests that this court grant the following relief:

- 16 41. Declare that Jasmine Sanchez and Angelo Sanchez violated plaintiffs fifth amendment
17 rights when they narrated, plagiarized, reproduced and infringed upon plaintiffs copyrighted
18 book material Drug Lords of Oakland during the performance and display on the YouTube
19 channel Evil Streets TV using YouTube as its ISP.
- 20 42. Declare that YouTube, violated plaintiffs statutory rights when they exercised control over
21 Jasmine Sanchez and Angelo Sanchez' content uploaded to Evil Streets TV channel on their
22 platform, and ;(b) Had a direct and financial interest in those activities that is not protected
23 by the Digital Millenium Copyright Act (DMCA),according to section 512(C) hereby
24 having vicarious liability of infringement on plaintiffs copyrighted book material Drug
25 Lords of Oakland.
- 26 43. Declare that Jasmine Sanchez is in violation of 17 U.S.C § 501., of the book Titus Lee
27 Barnes copyright number TX 8-646-340.
28

1 44. Declare that Jasmine Sanchez is in violation of 17 U.S.C § 501., of the book Titus Lee
2 Barnes copyright number TX 8-646-340.

3 45. Declare that YouTube, LLC., is in violation of 17 U.S.C § 501., of the book Titus Lee
4 Barnes copyright number TX 8-646-340.

5 46. Plaintiff seeks a 17 U.S.C. § 502(a) and S502(b), Preliminary and Permanent Injunction.

6 47. Plaintiff seeks an award of actual damages from defendants Jasmine Sanchez, Angelo
7 Sanchez, et al., each one of them under 17 U.S.C. § 504., for the irreparable harm their
8 actions have caused the plaintiff by creating a secondary market for his copywritten book
9 material Drug Lords of Oakland by Titus Lee Barnes.

10 48. Attorney fees and costs of this suit are herein.

11 49. For such other and further relief as the court may deem proper.

12 **DEMAND FOR JURY TRIAL**

13 50. Plaintiff demands a jury trial on all issues.

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15
16
17 DATED: April 2, 2026

Respectfully submitted,

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19 _____
20 Julian Barnes Aka Titus lee Barnes
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