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

11 ML1 RECORDS, LLC, and SAM TROCKI,

Case No. 2:22-CV-06015

12 Plaintiffs,

13 v.

**COMPLAINT FOR COPYRIGHT  
INFRINGEMENT**

14  
15 TRULY ORIGINAL, LLC; BRAVO  
MEDIA LLC; and NBCUNIVERSAL  
16 MEDIA, LLC

**DEMAND FOR JURY TRIAL**

17  
18 Defendants.

19 **INTRODUCTION**

20 1. This is a copyright infringement action arising from the unauthorized use by  
21 Defendants of Plaintiffs’ musical composition and sound recording “Lost Children” in two  
22 episodes of the reality TV show Real Housewives of Atlanta (the “RHOA”). Lost Children is a  
23 collaboration with the five-time Grammy award winner, CeeLo Green. It has had over 2 million  
24 views on YouTube, reached #1 on the iTunes UK Rock Single charts, and reached #48 on the  
25 UK Official Charts. A remixed version (the “Remix”) reached #2 on the iTunes UK Electronic  
26 Single charts.

27 2. Since 2006, Bravo has developed and released several reality TV shows in  
28 different cities on the “Real Housewives of [CITY]” model. The RHOA was launched in 2008

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1 and since then, has become wildly popular, being one of the most viewed shows of the “Real  
2 Housewives of” series. The show has been broadcast multiple times on TV and is available on  
3 demand at Bravotv.com and NBC.com, as well as on multiple streaming platforms like Hulu,  
4 Amazon Prime Video, Apple TV, YouTube/YouTube TV, Google Play, Peacock, Fubo, Vudu,  
5 and iTunes.

6 3. Defendants never sought or received Plaintiffs’ permission for any of these uses.  
7 Defendants’ uses therefore infringed on Plaintiffs’ copyrights. By this action, Plaintiffs seek  
8 compensation for their damages and injunctive relief.

9 **JURISDICTION AND VENUE**

10 4. This is a civil action seeking damages for copyright infringement under the  
11 Copyright Act, 17 U.S.C. § 101 et seq. in connection with Defendants’ unauthorized copying  
12 and subsequent use, performance, and exploitation of protected elements of Plaintiffs’  
13 copyrights.

14 5. This Court has original subject matter jurisdiction over this action pursuant to 28  
15 U.S.C. §§ 1331 and 1338(a). The alleged unlawful acts and violations described below were in  
16 part conceived, carried out and made effective within the Central District of California. All of  
17 the Defendants named herein transact or have transacted business in this District.

18 6. This Court has personal jurisdiction over Defendants because, among other  
19 things, Defendants are engaged in tortious conduct within the State of California and in this  
20 District, including by copying, altering, publicly performing, and distributing Plaintiff’s musical  
21 composition and sound recording within the United States and the State of California. Plaintiffs  
22 additionally aver that, among other things: (a) Defendants or their agents are doing or have been  
23 doing business continuously in the State of California and this District (b) a substantial part of  
24 the wrongful acts committed by Defendants have occurred in interstate commerce, in the State  
25 of California, and in the Central District of California, and (c) Defendants’ conduct causes injury  
26 to, and is directed at, Plaintiffs and their intellectual property, within the United States and  
27 California.

28 7. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2) & (3) as well

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1 as pursuant to 28 U.S.C. § 1391(c).

2 **THE PARTIES**

3 8. Plaintiff ML1 RECORDS (“ML1” or “PLAINTIFF”), a Louisiana Limited  
4 Liability Company headquartered in Lafayette, Louisiana, is one of the fastest growing music  
5 companies and independent record labels in the world. ML1 works with several high-profile  
6 artists, producers, engineers and songwriters, including Plaintiff SAM TROCKI.

7 9. Plaintiff SAM TROCKI (“TROCKI”) is a singer, songwriter, producer, fine artist  
8 and fashion designer based in Miami Beach, Florida. For the past two decades, he has written  
9 and produced hits with some of the biggest names in the music industry including Benny  
10 Blanco, CeeLo Green, Paul Oakenfold, Cam'ron and Neon Hitch.

11 10. Defendant TRULY ORIGINAL, LLC (“TRULY ORIGINAL”) is a Delaware  
12 Limited Liability Company, doing business throughout the State of California at all relevant  
13 times herein. Truly Original is the producer of RHOA.

14 11. Defendant BRAVO MEDIA LLC (“BRAVO”) is a New York Limited Liability  
15 Company, doing business throughout the State of California at all relevant times herein.  
16 Plaintiffs are informed and believe that BRAVO is a wholly owned subsidiary of  
17 NBCUniversal. BRAVO operates a cable television network and broadcasts RHOA.

18 12. Defendant NBCUNIVERSAL MEDIA, LLC, (“NBCU”) is a Delaware Limited  
19 Liability Company doing business throughout the State of California at all relevant times herein.  
20 NBCU is an American multinational mass media and entertainment conglomerate, is the parent  
21 company of BRAVO, and provides various platforms for distribution of RHOA.

22 13. Plaintiffs are informed and believe, and thereon allege, that each Defendant  
23 named in this Complaint is in some manner responsible for the wrongs and damages as alleged  
24 below, and in so acting were functioning, at least at times, as the agent, servant, partner, alter  
25 ego and/or employee of each of the other Defendants, and in doing and/or not doing the actions  
26 mentioned below was acting within the course and scope of its authority as such agent, servant,  
27 partner, and/or employee with the permission and consent of the other Defendants, and all acts  
28 herein alleged were approved of and ratified by each and every other Defendant.

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**CLAIM FOR RELIEF**  
**(Copyright Infringement)**

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14. TROCKI is owner of the copyrights in the musical composition and sound recording of Lost Children. Lost Children was first released to the public in or about September 2020. The copyright was registered with the Copyright Office on or about January 21, 2021, Registration No. SR0000892764.

15. A remixed version of Lost Children (the “Remix”) was first released to the public in or about November 2020. TROCKI registered the copyright in the Remix on or about October 27, 2021, Registration No. SR0000911876. The Remix incorporates substantial portions of the original musical composition and sound recording. Lost Children and the Remix shall be referred to jointly herein as “the Works”.

16. ML1 Records is the sole and exclusive administrator of all copyrights in the Works.

17. Starting at least as early as January 2021, and continuing through at least August 2022, Defendants TRULY ORIGINAL, BRAVO, and NBCU infringed the copyright in and to the Works by, among other things, reproducing, manufacturing, publicly performing and distributing copies of the Works on at least two separate episodes of RHOA: “The Giving Peach” – Season 13, Episode 6, from 2:00 to 2:59; and “How the Wig Stole Christmas” – Season 13, Episode 18, from 12:14 to 12:35.

18. Plaintiffs notified NBCU and BRAVO on or about May 14, 2022 of the infringements. Plaintiffs notified TRULY ORIGINAL of the infringements on or about May 16, 2022. Despite such notification, Defendants continued to infringe on Plaintiffs’ copyrights.

19. At no time have Plaintiffs authorized Defendants to reproduce, distribute, perform, create derivative works based on, or otherwise exploit all or any portion of the Works.

20. Defendants' unauthorized use constitutes infringement of Plaintiffs copyrights in both the composition and sound recording of the Works.

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Dated: August 24, 2022

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By   
\_\_\_\_\_  
Nicholas A. Carlin  
Nina C. Pouget  
Attorneys for Plaintiffs

**DEMAND FOR JURY TRIAL**

Plaintiffs hereby demand a trial by jury on all issues so triable.

Dated: August 24, 2022

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By   
\_\_\_\_\_  
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