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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 EDWIN BLANCO,
13 *Plaintiff,*

14 v.

15 MEGAN FOX,
16 *Defendant.*

Case No. 2:26-cv-00758

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

Jury Trial Demanded

17 Plaintiff Edwin Blanco, for his Complaint against Defendant Megan Fox,
18 alleges as follows:

19 **JURISDICTION**

20 1. This action arises under the Copyright Act of 1976, Title 17 U.S.C. § 101
21 et seq. This Court therefore has jurisdiction over the subject matter of this action
22 under 28 U.S.C. § 1331 (federal question) and § 1338 (copyright).

23 **PARTIES**

24 2. Plaintiff Edwin Blanco is a freelance photographer for global premier
25 celebrity news and photo agencies. He provides the world's news outlets with real-
26 time content about celebrities such as the defendant. Mr. Blanco also maintains a
27 library of photographs on a diverse range of subjects including celebrities, music,
28 sports, and fashion.

1 3. Mr. Blanco licenses photographs to leading magazines, newspapers, and
2 editorial clients, throughout the world.

3 4. Mr. Blanco is domiciled in the State of California and resides in Los
4 Angeles.

5 5. Defendant Megan Fox is a well-known actress and global celebrity.
6 Known for her striking looks and presence in Hollywood, Ms. Fox has become a
7 prominent figure in both film and television.

8 6. On information and belief, Ms. Fox is domiciled in the State of California
9 and resides in Calabasas.

10 7. On information and belief, Ms. Fox owns, operates, or is responsible for
11 the content of the social media account @meganfox on Instagram.

12 8. The Court has personal jurisdiction over Ms. Fox because she is
13 domiciled in California and resides in this judicial district.

14 9. Venue in this judicial district is proper under 28 U.S.C. § 1400(a).

15 **BACKGROUND FACTS**

16 10. Mr. Blanco owns and holds the copyright of a photographic image
17 depicting Megan Fox dressed as a character from the motion picture *Kill Bill* while
18 attending a Halloween party in Los Angeles (the “Image”).

19 11. Within 90 days of first publication, the Image was registered with the
20 U.S. Copyright Office as Reg. No. VA 2-375-169 (eff. Nov. 10, 2023).

21 12. Mr. Blanco captured the Image to document and highlight the event
22 itself, not to focus on Ms. Fox specifically. Nevertheless, Ms. Fox used the Image for
23 her own purposes without contacting Mr. Blanco or seeking a license.

24 13. Specifically, on or around October 28, 2023, defendant or her agents
25 copied the Image from unknown sources, stored the Image on a server, and displayed
26 the Image by posting it to Instagram on the @meganfox account.

27 14. The Image was used to promote Ms. Fox’s public appearances, boost
28 user engagement, increase shareability, and lend credibility to her branded content—

1 each of which enhanced the growth, reach, and perceived authority of Ms. Lopez’s
2 digital presence. Ms. Fox’s unauthorized use of the Image is therefore commercial in
3 nature, intended for the purpose of self-promotion.

4 15. Indeed, on information and belief, defendant knew that because of the
5 Image’s depiction of her, users would be attracted to view the Image and thus more
6 likely to subscribe and follow her social media accounts and engage with and share the
7 content, thus enhancing her reach and online influence.

8 **CLAIM ONE**

9 **(For Copyright Infringement, 17 U.S.C. § 501)**

10 16. Plaintiff realleged and incorporated by reference the allegations
11 contained in the preceding paragraphs of this Complaint as if fully set forth here.

12 17. Plaintiff is the copyright owner of the protected Image named above in
13 this Complaint.

14 18. Defendant has reproduced, displayed, or otherwise copied the Image
15 without plaintiff’s authorization or license.

16 19. The foregoing acts of defendant infringed upon the exclusive rights
17 granted to copyright owners under 17 U.S.C. § 106 to display, reproduce, and
18 distribute their work to the public. Such actions and conduct constitute copyright
19 infringement in violation of 17 U.S.C. §§ 501 et seq.

20 20. Plaintiff has complied in all respects with 17 U.S.C §§ 101 et seq. and
21 secured and registered the exclusive rights and privileges in and to the copyright of
22 the above-referenced work in accordance with 17 U.S.C § 408.

23 21. Plaintiff suffered damages as a result of defendant’s unauthorized use of
24 the Image.

25 22. Having timely registered his copyright in the Image, plaintiff is entitled
26 to elect statutory damages under 17 U.S.C. § 412 and § 504(c), in an amount of not
27 less than \$750 or more than \$30,000 per infringement of each work registered.
28

1 23. Plaintiff alleges, on information and belief, that defendant’s actions were
2 intentional or in reckless disregard of plaintiff’s copyright, and that such actions
3 support an award of enhanced statutory damages for willful infringement under the
4 Copyright Act, 17 U.S.C. § 504(c)(2), in the sum of up to \$150,000 per infringed
5 work.

6 24. In the alternative, plaintiff is entitled to recovery of his actual damages
7 and defendant’s profits attributable to the infringement of the Images, under 17
8 U.S.C. § 504(b).

9 25. Within the time permitted by law, plaintiff will make his election
10 between actual damages and profit disgorgement, or statutory damages.

11 26. Plaintiff is also entitled to a discretionary award of attorney fees under 17
12 U.S.C. § 412 and § 505.

13 **PRAYER FOR RELIEF**

14 WHEREFORE, Plaintiff requests the following:

15 A. For a preliminary and permanent injunction against defendant and
16 anyone working in concert with her from further copying or displaying the Image;

17 B. For an order requiring defendant to account to plaintiff for their profits
18 and any damages sustained by plaintiff arising from the acts of infringement;

19 C. As permitted under 17 U.S.C. § 503, for impoundment of all copies of
20 the Image used in violation of plaintiff’s copyright—including digital copies or any
21 other means by which they could be used again by defendant without plaintiff’s
22 authorization—as well as all related records and documents;

23 D. For actual damages and all profits derived from the unauthorized use of
24 the Image or, where applicable and at plaintiff’s election, statutory damages;

25 E. For an award of pre-judgment interest as allowed by law;

26 F. For reasonable attorney fees;

27 G. For court costs, expert witness fees, and all other costs authorized under
28 law;

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

JURY TRIAL DEMAND

Plaintiff demands a trial by jury of all issues permitted by law.

Dated: January 24, 2026

Respectfully submitted,

PERKOWSKI LEGAL, PC

By: /s/ Peter Perkowski

Peter E. Perkowski

Attorneys for Plaintiff
EDWIN BLANCO