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14 Attorneys for Plaintiff,
15 CHANTAE R. YOUNG

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 OAKLAND DIVISION

19 CHANTAE R. YOUNG,
20 Plaintiff,

21 v.

22 DAVID DWIGHT DANIELS,
23 Defendants.

Case No.:

PLAINTIFF’S COMPLAINT FOR DAMAGES FOR:

- 1. Violation of 15 U.S.C. §6851;
- 2. Temporary Restraining Order; and
- 3. Permanent Injunction

DEMAND FOR JURY TRIAL

24 _____/
25 Plaintiff CHANTAE R. YOUNG brings this Complaint against Defendant DAVID
26 DWIGHT DANIELS.

I.

PARTIES

27 1. Plaintiff CHANTAE R. YOUNG (hereinafter “Plaintiff”) is a resident of the
28 State of California, Contra Costa County.

1 IV.

2 FIRST CAUSE OF ACTION

3 Civil Action Relating to Disclosure of Intimate Images

4 (15 U.S.C. § 6851)

5 13. Plaintiff incorporates herein by reference as though fully set forth herein the
6 allegations of Paragraphs 1-12 inclusive.

7 14. On or about May of 2023, Defendant disclosed the video which contained
8 intimate visual depictions of Plaintiff via upload to a pornographic website.

9 15. Defendant used a means or facility of interstate or foreign commerce to
10 disclose the intimate visual depictions of Plaintiff when Defendant used the internet and
11 cellular networks to disclose the video which contained intimate visual depictions of
12 Plaintiff.

13 16. Plaintiff did not consent to Defendant's disclosure.

14 17. In the alternative, Defendant acted with reckless disregard as to whether
15 Plaintiff had consented to such disclosure.

16 18. Plaintiff has suffered damages as a result.

17 19. Plaintiff is entitled to liquidated damages in the amount of \$150,000.00
18 against Defendant for Defendant's disclosure, and the cost of the action, including
19 reasonable attorney's fees and other litigation costs reasonably incurred pursuant to
20 U.S.C. § 6851(b)(3)(I).

21 V.

22 REMEDIAL ALLEGATIONS

23 (Request for Temporary Restraining Order and Preliminary Injunction)

24 20. Plaintiff incorporates herein by reference as though fully set forth herein the
25 allegations of Paragraphs 1-19 inclusive.

26 21. The presence of the video, which contained intimate visual depictions of
27 Plaintiff, on a pornographic website continues to cause Plaintiff extreme emotional distress,
28 embarrassment, humiliation, and harm to her reputation.

1 22. Plaintiff is also entitled to equitable relief, including a permanent injunction
2 ordering Defendant to cease all display and/or disclosure of the visual depiction, pursuant
3 to 15 U.S.C. § 6851(b)(3)(ii).

4 23. Remedies at law are inadequate because no damage remedy could
5 compensate Plaintiff for the extreme emotional distress, embarrassment, humiliation, and
6 harm to her reputation which has been caused by the presence of the video on a
7 pornographic website.

8 24. Defendant will suffer no harm if he is required to remove the video from the
9 pornographic website until the rights of the parties are adjudicated.

10 25. Plaintiff will suffer irreparable and permanent harm if the video is not
11 immediately removed from the pornographic website.

12
13 **WHEREFORE**, Plaintiff prays for judgment in her favor and against Defendant and
14 for the following relief:

15 1. Finding Defendant liable under 15 U.S.C. § 6851;

16 2. Awarding Plaintiff liquidated damages in the amount of \$150,000 against
17 Defendant, and the cost of the action, including reasonable attorney's fees and other
18 litigation costs reasonably incurred pursuant to 15 U.S.C. § 6851(b)(3)(I);

19 3. Granting a Temporary Restraining Order against Defendant pursuant to 15
20 U.S.C. § 6851(b)(3)(ii);

21 4. Granting a Permanent Restraining Order against Defendant pursuant to 15
22 U.S.C. § 6851(b)(3)(ii); and

23 D. Awarding such other and further available relief and any other relief the Court
24 deems just and appropriate.

25 **DEMAND FOR JURY TRIAL**

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

