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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Ramales Photography LLC,  
  
Plaintiff,

v.

Belcalis Almanzar p/k/a Cardi B,  
  
Defendant.

Case No:

**COMPLAINT**

JURY TRIAL DEMAND

Plaintiff Ramales Photography LLC (“*Plaintiff*”), by and through its undersigned counsel, for its Complaint against defendant Creative Artists Agency LLC and Belcalis Almanzar p/k/a Cardi B (“*Defendant*”) states and alleges as follows:

**INTRODUCTION**

1. This action seeks to recover damages for copyright infringement under the Copyright Act, 17 U.S.C. §101 *et seq.*

2. Felipe Ramales (“*Ramales*”) is a famous New York-based paparazzi photographer renowned for capturing unposed, high-profile celebrity moments. Specializing in street photography, he gained fame for snapping the first public



1 images of Katie Holmes and Jamie Foxx

2 3. Rmales created a photograph of American rapper, Cardi B, walking  
3 down the street while wearing an outfit from Target. (the “*Photograph*”) in which  
4 Plaintiff owns the rights and licenses for various uses including online and print  
5 publications.

6 4. Defendant Belcalis Almanzar p/k/a (“Cardi B”) is a Grammy-winning  
7 recording artist, actress, and public figure. As a widely recognized entertainer with  
8 a substantial online following and global reach she routinely uses social media  
9 platforms to promote her music, brand partnerships, and other commercial ventures.  
10 Cardi B owns and operates a social media account on X known as iamcardib (the  
11 “*Account*”).

12 5. Defendant, without permission or authorization from Plaintiff, actively  
13 copied and/or displayed the Photograph on the Account and engaged in this  
14 misconduct knowingly and in violation of the United States copyright laws.

15 **PARTIES**

16 6. Rmales Photography LLC is a New York limited liability company  
17 and maintains its principal place of business in Bronx County, New York.

18 7. Upon information and belief, defendant Belcalis Almanzar p/k/a Cardi  
19 B, is an individual who is a citizen of the State of New Jersey with an address of 100  
20 Churchill Road, Tenafly New Jersey, Bergen County 07670.

21 **JURISDICTION AND VENUE**

22 8. This Court has subject matter jurisdiction over the federal copyright  
23 infringement claims pursuant to 28 U.S.C. §1338(a) and 28 U.S.C. §1331.

24 9. This Court has personal jurisdiction over Defendant because she  
25 maintains a principal place of business in California.

26 10. Venue is proper under 28 U.S.C. §1391(b)(2) because Defendant does  
27 business in this Judicial District and/or because a substantial part of the events or  
28

1 omissions giving rise to the claim occurred in this Judicial District.

2 **FACTS COMMON TO ALL CLAIMS**

3 **A. Plaintiff's Copyright Ownership**

4 11. Rames is a professional photographer by trade who is the legal and  
5 rightful owner of certain photographs which Plaintiff commercially licenses.

6 12. Plaintiff has invested significant time and money in building Plaintiff's  
7 photograph portfolio.

8 13. Plaintiff has obtained active and valid copyright registrations from the  
9 United States Copyright Office (the "USCO") which cover many of Plaintiff's  
10 photographs while many others are the subject of pending copyright applications.

11 14. Plaintiff's photographs are original, creative works in which Plaintiff  
12 owns protectable copyright interests.

13 15. On July 2, 2022, Plaintiff first published the Photograph. A copy of the  
14 Photograph is attached hereto as Exhibit 1.

15 16. In creating the Photograph, Rames personally selected the subject  
16 matter, timing, lighting, angle, perspective, depth, lens and camera equipment used  
17 to capture the image and made each and every artistic determination necessary for  
18 the creation of the work.

19 17. On August 13, 2022, the Photograph was registered by the USCO under  
20 Registration No. VA 2-316-558.

21 18. Rames created the Photograph with the intention of it being used  
22 commercially and for the purpose of display and/or public distribution.

23 **B. Defendant's Infringing Activity**

24 19. Defendant is the registered owner of the Account and is responsible for  
25 its content.

26 20. Defendant is the operator of the Account and is responsible for its  
27 content.  
28

1           21. The Account is a part of and used to advance Defendant's commercial  
2 enterprise.

3           22. Upon information and belief, Defendant is a sophisticated media  
4 personality business who owns a comprehensive portfolio of digital marketing assets  
5 and has expertise in an industry where copyright is prevalent.

6           23. Upon information and belief, Defendant's staff have significant  
7 experience in copyright matters and are familiar with specific practices including the  
8 need to ensure that images used in their posts have been properly licensed.

9           24. Upon information and belief, Defendant has not implemented adequate  
10 internal policies to verify copyright ownership before content use, indicating a gross  
11 negligence in legal compliance, which is essential for a person with Defendant's  
12 reach, capabilities, and level of sophistication.

13           25. Upon information and belief, Defendant's internal policies, if any, are  
14 either not designed to verify copyright ownership before content use or are  
15 systematically ignored, indicating a willful, recurring disregard for copyright  
16 compliance.

17           26. Defendants' failure to adopt or effectively enforce internal copyright  
18 policies, if any, indicates *de facto* willful infringement.

19           27. On or about July 3, 2022, without permission or authorization from  
20 Plaintiff, Defendant volitionally copied and displayed the Photograph on the  
21 Account as part of an on-line post at URL:  
22 <https://x.com/iamcardib/status/1543714517691006978> (“*Infringement*” #1). A copy  
23 of a screengrab depicting Infringement #1 is attached hereto as Exhibit 2.

24           28. On or about July 4, 2022, without permission or authorization from  
25 Plaintiff, Defendant volitionally copied and displayed the Photograph on the  
26 Account as part of an on-line post at URL:  
27 <https://x.com/iamcardib/status/1544052458305032193> (“*Infringement*” #2). A copy  
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1 of a screengrab depicting Infringement #2 is attached hereto as Exhibit 2.

2 29. The Infringements are exact copies of Plaintiff's original image that was  
3 directly copied and displayed by Defendant.

4 30. Plaintiff first observed the Infringements on May 15, 2024.

5 31. Upon information and belief, the Photograph was copied and displayed  
6 by Defendant without license or permission, thereby infringing on Plaintiff's  
7 copyrights in and to the Photograph.

8 32. The Infringements include URLs ("*Uniform Resource Locator*") for a  
9 fixed tangible medium of expression that was sufficiently permanent or stable to  
10 permit it to be communicated for a period of more than a transitory duration and  
11 therefore constitutes a specific infringement.

12 33. Upon information and belief, Defendant takes an active and pervasive  
13 role in the content posted on its Account, including, but not limited to copying,  
14 posting, selecting, commenting on and displaying images including but not limited  
15 to Plaintiff's Photograph.

16 34. Upon information and belief, the Photograph was willfully and  
17 volitionally posted to the Account by Defendant.

18 35. Upon information and belief, Defendant was aware of facts or  
19 circumstances from which the determination regarding the Infringements was  
20 apparent. Defendant cannot claim that it was not aware of the infringing activities,  
21 including the specific Infringements which form the basis of this complaint, since  
22 such a claim would amount to only willful blindness to the Infringements on the part  
23 of Defendant.

24 36. Upon information and belief, Defendant engaged in the Infringements  
25 knowingly and in violation of applicable United States copyright laws.

26 37. Upon information and belief, Defendant had complete control over and  
27 actively reviewed and monitored the content posted on the Account.  
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1 38. Upon information and belief, Defendant has the legal right and ability  
2 to control and limit the infringing activities on its Account and exercised and/or had  
3 the right and ability to exercise such right.

4 39. Upon information and belief, Defendant monitors the content on its  
5 Account.

6 40. Upon information and belief, Defendant has received a financial benefit  
7 directly attributable to the Infringements.

8 41. Upon information and belief, the Infringements increased traffic to the  
9 Account and, in turn, caused Defendant to realize an increase in its business  
10 revenues.

11 42. Upon information and belief, a large number of people have viewed the  
12 unlawful copies of the Photograph on the Account.

13 43. Upon information and belief, Defendant at all times had the ability to  
14 stop the reproduction and display of Plaintiff's copyrighted material.

15 44. Defendant's use of the Photograph harmed the actual market for the  
16 Photograph.

17 45. Defendant's use of the Photograph, if widespread, would harm  
18 Plaintiff's potential market for the Photograph.

19 46. On June 17, 2024, Plaintiff, via counsel, served a letter seeking to  
20 address the complaints contained herein concerning Defendant's infringement of  
21 Plaintiff's rights-protected work.

22 47. Thereafter, on August 1, 2024, Plaintiff, via counsel, served a follow  
23 up letter seeking to address said complaints directly with Defendant in attempt to  
24 avoid litigation.

25 48. Despite Plaintiff's efforts and willingness to address Defendant's  
26 infringing activity, Defendant failed to respond and Plaintiff was forced to seek  
27 judicial intervention for Defendant's infringing activity.  
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1 49. Further, despite Plaintiff's notification to Defendant concerning its  
2 infringing activity, Defendant continues to infringe on Plaintiff's work thereby  
3 establishing the willful nature of its conduct.

4 50. As a result of Defendant's misconduct, Plaintiff has been substantially  
5 harmed.

6 **FIRST COUNT**

7 ***(Direct Copyright Infringement, 17 U.S.C. §501 et seq.)***

8 51. Plaintiff repeats and incorporates by reference the allegations contained  
9 in the preceding paragraphs, as though set forth in full herein.

10 52. The Photograph is an original, creative work in which Plaintiff owns a  
11 valid copyright.

12 53. The Photograph is properly registered with the USCO and Plaintiff has  
13 complied with all statutory formalities under the Copyright Act and under  
14 regulations published by the USCO.

15 54. Plaintiff has not granted Defendant a license or the right to use the  
16 Photograph in any manner, nor has Plaintiff assigned any of its exclusive rights in  
17 the copyright to Defendant.

18 55. Without permission or authorization from Plaintiff and in willful  
19 violation of Plaintiff's rights under 17 U.S.C. §106, Defendant improperly and  
20 illegally copied, reproduced, distributed, adapted, and/or publicly displayed works  
21 copyrighted by Plaintiff thereby violating one of Plaintiff's exclusive rights in its  
22 copyrights.

23 56. Defendant's reproduction of the Photograph and display of the  
24 Photograph constitutes willful copyright infringement.

25 57. Upon information and belief, Defendant willfully infringed upon  
26 Plaintiff's copyrighted Photograph in violation of Title 17 of the U.S. Code, in that  
27 Defendant used, published, communicated, posted, publicized, and otherwise held  
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1 out to the public for commercial benefit, Plaintiff's original and unique Photograph  
2 without Plaintiff's consent or authority.

3 58. As a result of Defendant's violations of Title 17 of the U.S. Code,  
4 Plaintiff is entitled to any an award of actual damages and disgorgement of all of  
5 Defendant's profits attributable to the infringements as provided by 17 U.S.C. § 504  
6 in an amount to be proven or, in the alternative, at Plaintiff's election, an award for  
7 statutory damages against Defendant for each infringement pursuant to 17 U.S.C. §  
8 504(c).

9 59. As a result of the Defendant's violations of Title 17 of the U.S. Code,  
10 the court in its discretion may allow the recovery of full costs as well as reasonable  
11 attorney's fees and costs pursuant to 17 U.S.C. § 505 from Defendant.

12 60. As a result of Defendant's violations of Title 17 of the U.S. Code,  
13 Plaintiff is entitled to injunctive relief to prevent or restrain infringement of  
14 Plaintiff's copyright pursuant to 17 U.S.C. § 502.

15 **JURY DEMAND**

16 61. Plaintiff hereby demands a trial of this action by jury.

17 **PRAYER FOR RELIEF**

18 **WHEREFORE**, Plaintiff respectfully requests that the Court enters a  
19 judgment finding that Defendant has infringed on Plaintiff's rights to the  
20 Photograph in violation of 17 U.S.C. §501 *et seq.* and therefore award damages  
21 and monetary relief as follows:

- 22 a. finding that Defendant infringed Plaintiff's copyright interest in
- 23 and to the Photograph by copying and displaying it without a
- 24 license or consent.
- 25 b. for an award of actual damages and disgorgement of all of
- 26 Defendant's profits attributable to the infringements as provided
- 27 by 17 U.S.C. § 504(b) in an amount to be proven or, in the
- 28

1 alternative, at Plaintiff's election, an award for statutory damages  
2 against Defendant for each infringement pursuant to 17 U.S.C. §  
3 504(c), whichever is larger;

4 c. for an order pursuant to 17 U.S.C. § 502(a) enjoining Defendant  
5 from any infringing use of any of Plaintiff's works.

6 d. for costs of litigation and reasonable attorney's fees against  
7 Defendant pursuant to 17 U.S.C. § 505.

8 e. for pre-judgment interest as permitted by law; and

9 f. for any other relief the Court deems just and proper.  
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11 DATED: March 10, 2026

12 **SANDERS LAW GROUP**

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