

# INDR MUSIC ASSOCIATION

## OFFICIAL COPYRIGHT INFRINGEMENT COMPLAINT

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**Complaint Title:**

Unauthorized Copyright Circumvention and Infringement of INDR Music Association Works

**Description of Complaint:**

This complaint is filed pursuant to the protections afforded under U.S. Copyright Law. The INDR Music Association asserts that copyrighted musical works, which are protected under domestic and international intellectual property law, have been accessed and published without proper authorization.

The Association has determined that multiple entities and platforms have engaged in unauthorized activity, specifically involving circumvention of copyright protection mechanisms (DRM) and unlawful distribution of music files. These acts violate the lawful rights of the copyright holders, artists, and Music Association Copyright Partners.

The infringing activities include the unauthorized downloading and publishing of copyrighted materials originally under the control and ownership of INDR Music Association and its affiliated publishers. Furthermore, the association does not recognize any licensing rights claimed by the involved parties, nor were permissions granted to the websites or companies listed below.

**Involved Parties/Entities:**

- NCA LLC
- LenGrad LLC
- Creative Media LLC
- Novy Mir LLC
- Medialine LLC
- Digital Project LLC
- AdvMusic LLC

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The Association has found that the entities listed above, directly or through their affiliates, host or support a Russian-based pirated site that provides access to download copyrighted works without Music Association licensing or music publishing approval. These actions include the use of circumvention mechanisms to bypass DRM protections, a direct violation of federal law.

The Association has identified that this website continues to actively distribute and make available works that have been officially ceased, or are listed under protected distribution with the Association.

**Action Requested:**

The INDR Music Association, through the Office of Legal Counsel, formally requests that this complaint be processed as a legal submission for investigation, enforcement, and takedown purposes. We seek all available remedies under applicable law, including injunctive relief and damages where appropriate.

This complaint shall be sent to ad providers, IP holders, and hosting providers within 20 days of the date of this complaint.

Filed By:

Office of Legal Counsel

INDR Music Association

Complaint Filed to: Google Inc.

Filed and Sent to: Websters (Website Hosters)

Website Hosters Review Link: <https://new.indrmusicassociation.ltd/mp3mn>

Filed by: Regional Chairman of NY

Date: April 20th, 2025