

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MY BLOCK RECORDS, INC.	)	
Plaintiff	)	Civil Action No.
v.	)	
	)	COMPLAINT
SRG/ILS GROUP LP formerly	)	
SRG/ILS GROUP LLC	)	
Defendant	)	

JURISDICTION

1. This Court has diversity jurisdiction over this matter pursuant to 28 U.S.C. 1332 because: (a) this action is between citizens of different states; and (b) the matter in controversy exceeds \$1,000,000.00 inclusive of interest and costs. This Court has personal jurisdiction over Plaintiff's state law claims pursuant to 28 U.S.C. §1367(a). Venue is proper in this District pursuant to 28 U.S.C. §1391(b) because a substantial part of the events or omissions giving rise to this action, including certain unlawful actions alleged herein, occurred in this District. New York is the proper venue as the parties transacted and contracted for business establishing New York Courts with jurisdiction pursuant to N.Y. C.P.L.R. § 302 in this district.

PARTIES

2. My Block Records, Inc. ("Block") is a California entity with a business address at 21700 Oxnard Street, Suite 2030, Woodland Hills, CA 91367.

3. SRG/ILS Group LP, formerly SRG/ILS Group LLC ("SRG")¹ is owned by Claude Villani ("Villani"). Both SRG and Villani reside and are domiciled at 50 Water Street, Norwalk, CT 06854. SRG transacts business in New York State.

FACTS

4. In October 2021, SRG and Block executed a License Agreement ("Contract 1") for the distribution of master sound recordings associated with Block. The contract is governed by New York law and only the Courts in New York have jurisdiction to hear any dispute relating to Contract 1.

5. In September 2022, the parties amended the Contract ("Contract 2")². In return for marketing support on several projects, SRG would receive an increased distribution fee for substantial marketing support.

¹ The company converted from an LLC to LP in 2023.

² New York law also governs Contract 2.

6. The parties began releasing music in 2022.

Lena Bryd Miles

7. In 2022, SRG released the album “Brand New” from Block artist Lena Bryd Miles.


Search




Brand New
 Lena Byrd Miles >

Christian
 11 Songs
 Released Oct 14, 2022

\$9.99

Songs
Reviews
Related

	NAME	DURATION	POPULARITY	PRICE
1	Intro	00:25		\$1.29
2	Brand New	04:37		\$1.29
3	W.O.W. (Walk On Water)	03:52		\$1.29
4	This Is The Day	02:58		\$1.29
5	Back To You	04:31		\$1.29
6	I'm On Your Side	05:03		\$1.29
7	I Don't Want It	05:24		\$1.29
8	Watch Me	04:39		\$1.29
9	Yessuh (feat. The Soul Seekers)	05:38		\$1.29
10	Loving You (feat. The Ton3s)	05:25		\$1.29
11	Grateful Medley	09:34		\$1.29

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8. The parties engaged in promotion of the album in New York and substantial sales of the “Brand New” occurred in New York.

9. “Brand New” by Lena Bryd Miles was a commercial success and she was named the “Best New Artist” at the 37th Annual Stellar Awards.

10. SRG published a press release acknowledging the success of the album “Brand New” and Miles’ win at the Stellar Awards. [Lena Byrd Miles named Best New Artist at the 37th Annual Stellar Awards - SRG-ILS Group Global](#)

11. The song “WOW” on Miles’ album “Brand New” was a hit record and was Number 1 on the gospel radio charts in 2023. [Lena Byrd Miles Lands First Gospel Airplay No. 1 With ‘WOW’](#)

12. To date, SRG has not provided Block with any royalty statements relating to the release of the album “Brand New” in 2022. “Brand New” has accumulated over 5 Million streams and has produced over \$50,000.00 in gross sales.

The Walls Group

13. In February 2023, the parties the album “Four Walls” by Block artist The Walls Group.

10:11 5G+ 96

< Search >

Four Walls
The Walls Group >

Christian
13 Songs
Released Feb 24, 2023
★★★★★ (3)

\$9.99

Songs Reviews Related

Rank	Song Name	Duration	Price
3	I Will	04:43	\$0.99
4	Hallelujah	02:01	\$0.99
5	Agnus Dei (feat. Stevie Wonder)	05:20	\$0.99
6	I Need You	04:12	\$0.99
7	So into You	04:57	\$0.99
8	Run Away	04:05	\$0.99
9	Your Name Jesus	05:27	\$0.99
10	Human Nature	05:05	\$0.99
11	I'm Good With You (feat. Paul Jackso...	03:25	\$0.99
12	Stand Still	03:56	\$0.99
13	Come In	04:11	\$0.99

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Music Search Tones Purchased Downloads

14. The parties engaged in promotion of the album in New York and substantial sales of the “Four Walls” occurred in New York.

15. The album was a commercial success and “Four Walls” was nominated for multiple Stellar Awards and the 39th Annual Awards. [39th Stellar Awards List of Awardees - Journal of Gospel Music](#) The Group won Chorus Of The Year for the album release and the album peaked on Number 12 on the Billboard gospel sales chart.

16. To date, SRG has not provided Block with any royalty statements relating to the release of the album “Four Walls”. “Four Walls” has accumulated over 53 Million streams and over \$330,000.00 in gros sales.

Erica Campbell

17. In September 2023, the parties released the album “I Love You” from gospel superstar Erica Campbell.

I Love You
Erica Campbell >

Christian
13 Songs
Released Sep 15, 2023
★★★★★ (1)

\$9.99

Songs Reviews Related

	NAME	DURATION	POPULARITY	PRICE
1	"ItI" Overture (feat... Erica Campbell	00:42		\$0.99
2	I Love the Lord Erica Campbell &...	05:00		\$0.99
3	"Thank You (Than... Erica Campbell	03:58		\$0.99
4	Positive Erica Campbell	03:27		\$0.99
5	Dear Jesus (Lude) Erica Campbell &...	01:34		\$0.99
6	I Love You Erica Campbell	03:33		\$0.99
7	Feel Alright (Bless... Erica Campbell	04:29		\$0.99
8	The One That Got... Erica Campbell	02:18		\$0.99
9	Edges (feat. AMS) Erica Campbell	03:05		\$0.99
10	Do You Believe in... Erica Campbell	04:14		\$0.99

Music Search Tones Purchased Downloads

18. The parties engaged in promotion of the album in New York and substantial sales of the “I Love You” occurred in New York.

19. The album was a commercial success and “I Love You” was nominated for multiple Stellar Awards and the 39th Annual Awards. [39th Stellar Awards List of Awardees - Journal of Gospel Music](#) Warryn Campbell won “Producer Of The Year” for the album “I Love You” working with the legendary Erica Campbell. Erica Campbell is one-half of the gospel super group “Mary Mary” and has won multiple Grammy Awards.

20. “I Love You” was nominated for a Grammy Award and was Number 1 on the gospel sales Billboard Charts. “I Love You” has accumulated over 55 Million streams and over \$360,000.00 in gross sales.

21. To date, SRG has not provided Block with any royalty statements relating to the release of the album “I Love You”.

Termination Of The License Agreement (“Contract 3”)

22. In December 2023, Block and SRG terminated Contracts 1 and 2. SRG’s obligation to continue to pay royalties to Block was not extinguished.

23. SRG retained the ability to distribute Block’s albums through March 1, 2024.

24. Block’s album releases “Brand New” “Four Walls” and “I Love You” sold over 113 Million streams between 2022-2024 and generated over One Million Dollars (\$1,000,000.00) in sales.

25. Two of Erica Campbell’s singles on the album “I Love You” have been streamed over Four Million times (4,000,000) (“Do You Believe In Love” and “Feel Alright”) on Spotify alone.

26. Two of The Walls Group singles on the album “Four Walls” have been streamed over Three Million Seven Hundred Thousand times (3,700,000) (“I Need You and “Come In”) on Spotify alone.

27. Lena Bryd James singles on the album “Brand New” have been streamed over One Million Three Hundred Thousand times (1,300,000) on Spotify alone.

28. SRG has never provided Block a royalty statement.

29. Due to SRG’s breaches, Block has been harmed in its business.

COUNT I- BREACH OF CONTRACTS 1 and 2

30. Plaintiff repeats the allegations in paragraphs 1-29.

31. SRG has failed to account for sales associated with the album sales and single sales of “Brand New” “Four Walls” and “ I Love You” and other releases including the album “Warryn Campbell: Presents My Block”.

32. SRG failed to spend contractual marketing amounts allocated for Block’s releases and has failed to provide receipts or evidence of marketing spends for Block albums. unsubstantiated or unapproved deductions to the statements.

33. SRG failed to obtain approval of expenses associated with Block releases.

34. Block performed its obligations pursuant to Contract 1 and the amendment, Contract 2.

35. SRG has breached Contract 1 and Contract 2.

36. Block has been harmed by the actions of SRG.

**COUNT II- BREACH OF CONTRACT-
CONTRACT 3**

37. Block repeats the allegations in paragraphs 1-36.

38. SRG has failed to account for sales associated with the album sales and single sales of “Brand New” “Four Walls” and “ I Love You” during Contract 3³.

39. SRG continued to distribute Block releases through March 1, 2024.

40. SRG failed to obtain approval of expenses associated with Block releases.

41. Block performed its obligations pursuant to Contract 3.

42. SRG has breached Contract 3.

43. SRG failed to provide statements to Block during the term of Contract 3.

44. SRG’s breach of contract has harmed Block in its business.

**COUNT III
BREACH OF IMPLIED COVENANT OF FAIR DEALING
CONTRACTS 1-3**

45. Block repeats the allegations at paragraphs 1-44.

³ New York law also governs Contract 3.

46. Block and SRG signed Contracts 1-3 as described above.

47. In every contract there is an implied covenant that neither party shall do anything which will have the effect of destroying or injuring the right of the other party to receive the fruits of the contract, which means that in every contract there exists an implied covenant of good faith and fair dealing.” *Kirk La Shelle Co. v. Paul Armstrong Co.*, 263 N.Y. 79, 87 (N.Y. 1933).

48. Since *Kirk La Shelle*, the courts in New York have implied a covenant of good faith and fair dealing in the course of the performance of all contracts. *See, e.g., Van Valkenburgh, Nooger & Neville v. Hayden Publ. Co.*, 30 N.Y.2d 34, 45 (N.Y.), *cert. denied*, 409 U.S. 875 (1972);

49. SRG has violated the covenant of good faith and fair dealing in the performance of Contracts 1-3.. SME’s tactics in regard to (1) accounting (2) failing to report royalties violate New York law.

50. SRG’s unlawful actions violated the rights of Block.

WHEREFORE, THE PLAINTIFF DEMANDS AS FOLLOWS:

The Plaintiff demands trial by jury and,

1. Judgment on all counts in excess of \$1,000,000.00;
2. Interest;
3. Attorneys Fees;
4. Any other relief this Court deems just and equitable.

MY BLOCK RECORDS, INC.

By Their Attorneys,

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Dated: September 17, 2026