

THOMAS MORE SOCIETY

A National Public Interest Law Firm

January 26, 2010

VIA FACSIMILE 650-253-0001

YouTube, LLC
901 Cherry Ave.
San Bruno, CA 94066

To whom it may concern:

At the request of Fr. Walter Tanelotto, pastor of St. James Church in New York City, New York, we request that you remove unauthorized videos taken inside that Church of a concert on January 15, 2010, that were neither authorized nor permitted by the Church. Several of the videos may be found at <http://www.youtube.com/watch?v=ohumIWJnDc8> (Beach Fossils at St James Church) and <http://www.youtube.com/watch?v=phmy2GsB-PQ> (The Beets at St James Church).

A Roman Catholic music event was authorized for that evening. However, that authorization appears to have been secured by fraud and deception by the group, "Less Artists More Condos," as a cover to put on a non-religious and at times obscene "indie rock" concert. The Church is currently exploring all available legal options in relation to this matter and considers the actions of "Less Artists More Condos" to be illegal and highly offensive.

St. James Church, one of the oldest churches in New York City, has numerous policies and regulations that were blatantly violated by this illegal concert. First and foremost, the Church does not allow videotaping or pictures of the Church and its priceless art and architecture without prior permission, which was not obtained here.

Moreover, alcoholic beverages, which appear in some of the videos and other pictures of the event, are not permitted for non-religious purposes in the Church. Those drinking the beverages may be under the age of 21, which would also be illegal. We do not know if the beverages were sold to those present by the organizer, which would similarly be illegal and not permitted by the Church.

Further, the use of the central sanctuary, the altar, and other sacred places for a concert is disallowed by St. James Church. Particularly in light of the nature of the concert itself, the use of these sacred places is a grave abuse and offense to the Church and to all Roman Catholics.

The fraudulent use of St. James Church was illegal, and the videos and pictures obtained during that use depict and celebrate that fraud. The action by "Less Artists More Condos" to wrongfully obtain entry and use of a house of worship is disrespectful and insulting to all people

29 S. LaSalle | Suite 440 | Chicago, IL 60603 | www.thomasmoresociety.org | P: 312.782.1680 F: 312.782.1887

"Injustice anywhere is a threat to justice everywhere." - Martin Luther King

of faith. These hateful and bigoted actions should not be demonstrated, celebrated, and encouraged by the showing of these videos and images on your website.

With respect, we request that these videos be removed and barred immediately from your site. We look forward to your cooperation and would appreciate that you confirm with us that the videos are removed.

Very truly yours,

A handwritten signature in black ink, appearing to read "Peter C. Breen", with a long horizontal flourish extending to the right.

Peter C. Breen

Executive Director & Legal Counsel