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7 *Attorney for Plaintiff,*  
8 *Christopher J. Cordova*

9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 CHRISTOPHER J. CORDOVA,

12 Plaintiff,

13 vs.

14 JONATHAN HUNEALT,

15 Defendant.

Case No. 25-cv-04685-VKD

**HON. VIRGINIA K. DEMARCHI**

**DISCOVERY MATTER**

***EX PARTE* APPLICATION FOR  
LEAVE TO SERVE A THIRD-  
PARTY SUBPOENA PRIOR TO A  
RULE 26(F) CONFERENCE;  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT  
THEREOF**

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 PLEASE TAKE NOTICE that Plaintiff Christopher J. Cordova (“Plaintiff”) will and  
3 hereby does apply to the Court *ex parte* for leave to issue a third-party subpoena on Google  
4 LLC d/b/a YouTube to identify Defendant prior to a Fed. R. Civ. P. 26(f) conference.

5 This application is based upon: the Memorandum of Points and Authorities; the  
6 concurrently-attached Declaration of Randall S. Newman; upon all pleadings and evidence  
7 on file in this matter; and upon such additional evidence or arguments as may be accepted  
8 by the Court.

9  
10 Dated: July 11, 2025

Respectfully submitted,

11  
12 By: s/ Randall S. Newman  
13 Randall S. Newman, Esq.

14 *Attorney for Plaintiff,*  
15 *Christopher J. Cordova*

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Pursuant to Fed. R. Civ. P. 26(d)(1), Plaintiff Christopher J. Cordova (“Plaintiff”)  
3 hereby respectfully submits this Memorandum of Points and Authorities in support of its  
4 *ex parte* application for leave to serve a third-party subpoena prior to the Rule 26(f)  
5 conference.

6 **INTRODUCTION**

7 This is a copyright infringement action arising from the unauthorized use of  
8 Plaintiff’s original audiovisual work titled *Another Chad Exposed!!! Worthless Denver*  
9 *Cops...ASSAULTED!!!* (the “Registered Video”) by a YouTube user operating under the  
10 alias “Frauditor Troll (the “FT Channel”)”<sup>1</sup>. The 48-minute, 14-second copyrighted video,  
11 captured and published by Plaintiff on his @DenverMetroAudits YouTube channel,  
12 documents a real-time encounter between Plaintiff, members of the Denver Police  
13 Department, and a third-party bystander. It was created to expose potential police  
14 misconduct and promote government accountability through public dissemination.<sup>2</sup>

15 Defendant, who purportedly operates the FT Channel, republished a substantial  
16 portion of the Registered Video (the “Infringing Video”). Defendant did not obtain a  
17 license, did not seek permission, and added little commentary, criticism, parody, or  
18 transformative content to the Registered Video.<sup>3</sup>

19 On or about June 5, 2023, Plaintiff filed a valid DMCA takedown notice to YouTube  
20 for the unauthorized use of the Registered Video. The following day, Defendant submitted  
21 a counter-notification under 17 U.S.C. § 512(g)(2)(C), listing a fictitious address in New  
22 York City for service of process. Plaintiff attempted service at that address but was  
23 unsuccessful. Because the FT Channel remains pseudonymous and is operated through

24 \_\_\_\_\_  
25 <sup>1</sup> <https://www.youtube.com/@frauditortroll>.

26 <sup>2</sup> Plaintiff’s video is available at the URL <https://youtu.be/bhgHsPl4Mr0?si=F-7EgMg0bBZiy-QY>.

27 <sup>3</sup> The Infringing Video was posted to the URL <https://youtu.be/I-J8sdKZ504?si=s9kES3XTGpURZ1A3>  
28 but was removed after Plaintiff commenced this action.

1 Google services (including YouTube and Gmail), Plaintiff cannot identify or serve  
2 Defendant without Court-authorized third-party discovery.

3 Accordingly, Plaintiff respectfully moves for leave to serve a proposed Rule 45  
4 subpoena on Google LLC (the “Proposed Subpoena”). The Proposed Subpoena is attached  
5 as Exhibit F to the Declaration of Randall S. Newman (“Newman Decl.”). Plaintiff will  
6 use this limited discovery solely to investigate and serve the Defendant and proceed with  
7 this action. Without such relief, Plaintiff cannot protect his exclusive rights under the  
8 Copyright Act and cannot move forward with this litigation.

9 I. **Legal Standard Governing Expedited Discovery Requests to Identify an**  
10 **Anonymous Defendant.**

11 Federal Rule of Civil Procedure 26(d)(1) generally prohibits discovery before the  
12 Rule 26(f) conference, except by court order. Courts in this District routinely grant  
13 expedited discovery where a plaintiff demonstrates good cause—especially in cases  
14 involving anonymous online defendants whose identities are not otherwise ascertainable.  
15 In *Columbia Insurance Co. v. seescandy.com*, 185 F.R.D. 573 (N.D. Cal. 1999), the court  
16 established a widely adopted framework for authorizing early discovery to identify  
17 anonymous internet users. Under *seescandy*, a plaintiff must: (1) identify the defendant  
18 with sufficient specificity to show that the defendant is a real person or entity subject to  
19 suit; (2) describe all previous attempts to locate and identify the defendant; (3) establish a  
20 prima facie case against the defendant, including a plausible claim for copyright  
21 infringement; and (4) show that the requested discovery is necessary and narrowly tailored  
22 to uncover the defendant’s identity. *Id.* at 578–80.

23 These requirements are intended to balance a plaintiff’s right to pursue legitimate  
24 claims with a defendant’s right to remain anonymous until the claim is substantiated.  
25 Courts applying *seescandy* have emphasized that such discovery should be “limited and  
26 focused” to ensure minimal intrusion into privacy. *See also Gillespie v. Civiletti*, 629 F.2d  
27 637, 642 (9th Cir. 1980) (“[W]here the identity of alleged defendants [is] not known prior  
28

1 to the filing of a complaint...the plaintiff should be given an opportunity through discovery  
2 to identify the unknown defendants...”).

3 As shown below, Plaintiff satisfies all four *seescandy* criteria and respectfully  
4 requests leave to serve the Proposed Subpoena on Google, LLC to obtain the information  
5 sought therein.

## 6 **II. ARGUMENT**

### 7 **1. The Operator of the Frauditor Troll Channel is a Person or Entity** 8 **Capable of Being Sued.**

9 Where the identity of a defendant is unknown at the time of filing, a plaintiff should  
10 be permitted discovery to identify the unknown party and to identify the individual  
11 responsible for the infringing activity. *Civiletti*, 629 F.2d 637, 642 (9th Cir. 1980). As  
12 discussed below, Plaintiff has identified the owner/operator of the YouTube channel  
13 “Frauditor Troll” as a real person or entity engaged in ongoing commercial activity through  
14 monetized content and regular uploads.<sup>4</sup>

15 Based on the June 6, 2023 counter-notification filed in response to the June 5, 2023  
16 takedown notice regarding the Infringing Video, as well as multiple other DMCA counter-  
17 notifications submitted under 17 U.S.C. § 512(g)(2)(C) concerning several of Plaintiff’s  
18 other videos, Plaintiff reasonably believed that the operator of the FT Channel was  
19 Jonathan Huneault. (Newman Decl. ¶¶ 13-14, Exs. G, H). However, it is now confirmed  
20 that Defendant provided a fictitious address without a suite number in his counter-notices,  
21 and that development raises the probability that Huneault is either using an alias or does  
22 not actually own/operate the FT Channel. Given the use of fraudulent contact information  
23 and the pseudonymous nature of the FT Channel, Plaintiff cannot confirm the identity of  
24 the responsible party or attempt to effectuate service without Court-authorized discovery.

25  
26  
27  
28 <sup>4</sup> A video was uploaded to the FT Channel on July 5, 2020. See <https://www.youtube.com/watch?v=JSMHjwUSwJY>.

1           i.       **Defendant is Likely Subject to this Court’s Jurisdiction.**

2           17 U.S.C. § 512(g)(3)(D) states that a counter notification must contain:

3  
4           [t]he “subscriber’s name, address, and telephone number, and a statement that  
5           the subscriber consents to the jurisdiction of Federal District Court for the  
6           judicial district in which the address is located, or if the subscriber’s address  
7           is outside of the United States, for any judicial district in which the service  
8           provider [i.e., YouTube] may be found, and that the subscriber will accept  
9           service of process from the person who provided” the DMCA takedown  
10          notice.

11  
12          Here, Defendant submitted a counter-notification regarding the Infringing Video  
13 listing the address “99 Wall Street, New York, NY 10005” with no suite number<sup>5</sup>, an  
14 address Plaintiff has determined to be fictitious. (Newman Decl. ¶¶ 6-8, Ex. B). Based on  
15 available evidence, Plaintiff believes that Huneault, or the true operator of the FT Channel,  
16 resides in Canada. (Id. ¶¶ 9-10, Exs. C, D). If Huneault is actually a Canadian resident he  
17 would be subject to jurisdiction in this District under 17 U.S.C. § 512(g)(3)(D).<sup>6</sup>

18          By submitting a counter-notification with a false U.S. address, Defendant triggered  
19 YouTube’s obligation to restore the disputed content while simultaneously attempting to  
20 shield himself from proper service and jurisdiction. Courts have repeatedly rejected such  
21 gamesmanship. Defendant cannot invoke the benefits of the DMCA’s counter-notice  
22 procedure and then rely on fraudulent information to avoid the jurisdiction he expressly  
23

24  
25 <sup>5</sup> This was not an isolated error. Defendant submitted multiple DMCA counter-notices using the same  
26 fictitious address, “99 Wall Street, New York, NY 10005,” without a suite number, demonstrating a deliberate pattern of deception rather than an inadvertent mistake.  
27 (Newman Decl. ¶ 14 and Ex. H).

28 <sup>6</sup> In paragraph 10 of the Complaint, Plaintiff alleged that the 99 Wall Street address was likely fictitious  
and that Huneault was actually a resident of Canada. (Complaint ¶ 10).

1 consented to. Jurisdiction is proper in this District under both § 512(g)(3)(D) and traditional  
2 principles of fair play and substantial justice.

3 **2. Plaintiff has Already Made Good-Faith Efforts to Contact and**  
4 **Serve the FT Channel Operator.**

5 On June 6, 2025, June 12, 2025, and June 23, 2025, Plaintiff’s counsel sent three  
6 separate emails to the address listed on the counter-notice, FrauditorTroll@gmail.com,  
7 each attaching a copy of the complaint and requesting that Defendant execute a waiver of  
8 service pursuant to Rule 4(d). (Newman Decl. ¶ 4, Ex. A). Defendant failed to respond to  
9 any of these communications. (Newman Decl. ¶ 5).

10 Plaintiff also retained a professional process server to attempt service at the address  
11 listed in Defendant’s DMCA counter-notification: 99 Wall Street, New York, NY 10005.  
12 (Newman Decl. ¶ 6). Service could not be completed, as the address lacked a suite number  
13 and appears to be fictitious. (Newman Decl. ¶ 7, Ex. B.)

14 These multiple waiver requests and the failed physical service attempt demonstrate  
15 Plaintiff’s diligent, good-faith efforts to identify, notify and serve the operator of the FT  
16 Channel prior to seeking early third-party discovery.

17 **3. Plaintiff Has Made a *Prima Facie* Claim of Copyright**  
18 **Infringement.**

19 Plaintiff owns the exclusive rights to Registered Video and has registered the  
20 copyright with the U.S. Copyright Office. (Newman Decl. ¶ 11, Ex. E). To state a claim  
21 for copyright infringement, Plaintiff must allege: (1) ownership of a valid copyright, and  
22 (2) copying of original elements of the work. *Feist Pub., Inc. v. Rural Tel. Serv. Co.*, 499  
23 U.S. 340, 361 (1991).

24 Plaintiff’s Complaint satisfies both elements. First, Plaintiff is the original author  
25 and owner of the video titled *Another Chad Exposed!!! Worthless Denver*  
26 *Cops...ASSAULTED!!!*, which captures real-time, expressive footage of a police encounter  
27 and was published on Plaintiff’s YouTube channel @DenverMetroAudits. (Compl. ¶ 32).  
28

1 Plaintiff has registered this video with the U.S. Copyright Office. (Newman Decl. ¶ 11, Ex.  
2 E).

3 Second, the Complaint alleges that Defendant incorporated approximately 56% of  
4 Plaintiff's copyrighted work into the Infringing Video without a license or permission.  
5 (Compl. ¶ 63). Excluding the intro and outro, approximately 87% of the Infringing Video  
6 is footage from the Registered Video. (*Id.*) Plaintiff alleges that Defendant's use was not  
7 transformative, as the Infringing Video contains minimal to no commentary during large  
8 stretches of Plaintiff's footage. (*Id.* ¶ 65). These facts, taken as true, are more than sufficient  
9 to establish a prima facie claim of copyright infringement.

#### 10 **4. The Discovery Request is Narrowly Tailored.**

11 Plaintiff's Proposed Subpeona is narrowly tailored to seek only the limited  
12 information necessary to identify the owner/operator of the FT Channel and his actual  
13 location. (Newman Decl. Ex. F). The proposed Subpoena to Google, LLC seeks basic  
14 subscriber registration information, IP address logs, and other information associated with  
15 the YouTube channel "Frauditor Troll". (Newman Decl. Ex. F).

16 The Proposed Subpeona does not request content, communications, or any  
17 information beyond what is reasonably calculated to identify the individual or entity  
18 responsible for the infringing upload. It is narrowly limited in scope, directed only to  
19 Google, and concerns a specific channel. This is precisely the type of early discovery  
20 routinely approved in cases involving what appears to be an anonymous defendant. *See*  
21 *Columbia Ins. Co. v. seescandy.com*, 185 F.R.D. 573, 578 (N.D. Cal. 1999) ("[T]he  
22 discovery request must be narrowly tailored to minimize the impact on the First  
23 Amendment rights of the Doe defendants.").

24 Without this narrowly targeted information, Plaintiff cannot amend the complaint,  
25 serve Defendant, or proceed with the case. The attached subpoena represents the least  
26 intrusive means to advance this litigation in a fair and proportionate manner. In short, the  
27 Subpoena seeks no more information than is necessary to accomplish service, precisely the  
28 function Rule 26(d) is intended to support in Doe-defendant cases.

1           **5. In the Alternative, Plaintiff requests a Stay of this Action to**  
2           **Pursue a Subpoena using 17 U.S.C. § 512(h) Without Court**  
3           **Intervention.**

4           Under 17 U.S.C. § 512(h), a copyright owner may obtain a subpoena to identify an  
5 alleged infringer directly from the Clerk of Court, without filing a lawsuit, making any  
6 evidentiary showing, or demonstrating personal jurisdiction over the individual. Plaintiff  
7 submitted a valid takedown notice under § 512(c). (Newman Decl. Exs. E, G). As such,  
8 Plaintiff would have been entitled to a § 512(h) subpoena by simply submitting a short  
9 form and sworn declaration.

10          Under these circumstances, it would be incongruous to deny Plaintiff the limited  
11 discovery necessary to serve the complaint as it would allow Huneault to hide behind his  
12 fraudulent counter-notices. Granting early discovery here upholds the spirit of due process  
13 and reinforces the Court’s supervisory role.

14          This case is distinguishable from anonymous file-sharing lawsuits where courts in  
15 this District have expressed concern about privacy rights and the potential for abuse. Here,  
16 Plaintiff filed a legitimate takedown pursuant to 17 U.S.C. § 512(c), holds a registered  
17 copyright, and seeks to identify a commercial operator of a public, monetized YouTube  
18 channel that republished Plaintiff’s copyrighted work for profit. Unlike copyright “troll”  
19 cases involving alleged downloads of pornographic content, this action is transparently  
20 filed, supported by a registered work, and does not seek coercive settlements or exploit  
21 sealed proceedings.

22          Moreover, a § 512(h) subpoena may be issued by the Clerk of *any* federal district  
23 court, without regard to the alleged infringer’s residence. (17 U.S.C. § 512(h)(1) states that  
24 “...the copyright owner...may request the clerk of any United States district court to issue  
25 a subpoena to a service provider...”). Accordingly, it would be inconsistent to deny  
26 discovery here when the same unmasking relief could be obtained through § 512(h),  
27 without any jurisdictional showing at all.

1 By proceeding via a public complaint instead of an administrative subpoena,  
2 Plaintiff has invoked full judicial oversight and afforded the owner of the FT Channel the  
3 protections of Rule 45 and the Federal Rules of Civil Procedure. This approach promotes  
4 transparency, fairness, and due process, and it should not be penalized for demanding *more*  
5 procedural protection, not less.

6 Therefore, should the Court determine that early discovery is unavailable in this  
7 action, Plaintiff respectfully requests that the case be stayed to permit the filing of a  
8 separate proceeding under § 512(h) solely to identify the operator of the FT Channel and  
9 determine his location. However, requiring such procedural gymnastics would  
10 unnecessarily burden both Plaintiff and the judiciary, given that the requested information  
11 can be obtained more efficiently—and with greater fairness—through targeted discovery  
12 in this properly filed case.

13 **CONCLUSION**

14 For the foregoing reasons, Plaintiff respectfully requests that the Court grant leave  
15 to serve the proposed subpoena on Google, LLC, in the form attached as Exhibit F, for the  
16 limited purpose of identifying the Doe Defendant. Plaintiff has stated a *prima facie* claim  
17 of copyright infringement, has shown that the discovery sought is both necessary and  
18 narrowly tailored, and cannot proceed without identifying the individual responsible for  
19 the infringing conduct. Early discovery is therefore warranted under applicable law.

20  
21  
22 Dated: July 11, 2025

23 /s/ Randall S. Newman  
24 Randall S. Newman, Esq. (SBN 190547)  
25 99 Wall Street, Suite 3727  
26 New York, NY 10005  
27 (212) 797-3735  
28 rsn@randallnewman.net

*Attorney for Plaintiff,  
Christopher J. Cordova*

1 RANDALL S. NEWMAN (SBN 190547)  
2 Attorney at Law  
3 99 Wall St., Suite 3727  
4 New York, NY 10005  
5 212.797.3735  
6 rsn@randallnewman.net

7 *Attorney for Plaintiff,*  
8 *Christopher J. Cordova*

9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 CHRISTOPHER J. CORDOVA,

12 Plaintiff,

13 vs.

14 JONATHAN HUNEALT,

15 Defendant.

Case No. 25-cv-04685-VKD

**HON. VIRGINIA K. DEMARCHI**

**DISCOVERY MATTER**

**DECLARATION OF RANDALL S.  
NEWMAN IN SUPPORT OF  
EX-PARTE APPLICATION FOR  
LEAVE TO SERVE A THIRD-  
PARTY SUBPOENA PRIOR TO A  
RULE 26(f) CONFERENCE**

**DECLARATION OF RANDALL S. NEWMAN**

1  
2 I, Randall S. Newman, hereby swear and affirm pursuant to 28 U.S.C. § 1746 upon  
3 direct personal knowledge that the following is true and correct:

4 1. I am an attorney duly licensed to practice before this Court and am the attorney  
5 for Plaintiff Christopher J. Cordova also known as Denver Metro Audits (“Plaintiff”).  
6 Unless otherwise stated, I have first-hand personal knowledge of the facts stated herein and  
7 if called as a witness could competently testify thereto.

8 2. Plaintiff commenced this action against Defendant Jonathan Huneault d/b/a  
9 <https://www.youtube.com/@frauditortroll> (“Huneault”).

10 3. Plaintiff named Huneault as the Defendant in good faith based upon the  
11 information provided in a DMCA counter-notice, which identified him as the purported  
12 operator of the YouTube channel “Frauditor Troll.” Although Huneault provided a

13 4. On June 6, 2025, June 12, 2025, and June 23, 2025, I sent emails to  
14 [FrauditorTroll@gmail.com](mailto:FrauditorTroll@gmail.com), each attaching a copy of the Complaint and requesting that  
15 Defendant execute a waiver of service pursuant to Rule 4(d). A true and correct copy of  
16 those emails are attached hereto as **Exhibit A**.

17 5. These emails were not returned as undeliverable, but Huneault failed to  
18 respond to any of them.

19 6. On July 1, 2025, I retained Supreme Judicial Services, Inc., a professional  
20 process server based in Rockville Centre, New York, to serve Huneault (the “Process  
21 Server”).

22 7. The Process Server attempted service on July 1, 2025, but was unsuccessful.  
23 A true and correct copy of the Process Server’s Affirmation of Due Diligence is attached  
24 hereto as **Exhibit B**.

25 8. As reflected in the Affirmation of Due Diligence, the Process Server reported:  
26 “I WAS UNABLE TO LOCATE THE DEFENDANT IN THE BUILDING WITHOUT A  
27 SUITE NUMBER.”

1 9. Attached as **Exhibit C** is a screenshot from a July 5, 2025 video posted to the  
2 FT Channel. That post says, in part, “[c]heck out my anti-nuisance streamer channel  
3 @15minutesofshame”.

4 10. Attached as **Exhibit D** is a screenshot from the 15 Minutes of Shame  
5 YouTube channel, which lists its location as Canada.

6 11. Plaintiff has registered the copyrighted video at issue with the U.S. Copyright  
7 Office. A true and correct copy of the registration certificate is attached hereto as **Exhibit**  
8 **E**.

9 12. The proposed subpoena to Google, LLC d/b/a YouTube is attached hereto as  
10 **Exhibit F**. It seeks only limited identifying information about the Frauditor Troll YouTube  
11 channel, such as subscriber names, addresses, email addresses, associated IP addresses, and  
12 monetization details, necessary to identify the FT Channel owner.

13 13. Attached as **Exhibit G** is a true and correct copy of a counter-notice  
14 Defendant sent to YouTube on or about June 6, 2023 regarding the Plaintiff’s Registered  
15 Video and Defendant’s Infringing Video.

16 14. Attached as **Exhibit H** are true and correct copies of other DMCA takedown  
17 notices submitted to YouTube by Hunealt that also show a 99 Wall Street address with no  
18 suite number. These videos *are not currently* the subject of this copyright infringement.

19 15. This discovery is essential to identify the proper party Defendant, amend the  
20 Complaint if necessary, effect service, and proceed with the prosecution of this case.

21 I declare under penalty of perjury under the laws of the United States of America  
22 that the foregoing is true and correct.

23 Executed on this 11th day of July, 2025, in Bangkok, Thailand.

24  
25 s/ Randall S. Newman  
26 Randall S. Newman  
27  
28

**rsn@randallnewman.net**

---

**From:** rsn@randallnewman.net  
**Sent:** Friday, June 6, 2025 12:39 PM  
**To:** 'FrauditorTroll@gmail.com'  
**Subject:** Cordova v. Huneault - Initiating Documents and Waiver of Service Request - NDCA Case No. 25-cv-04685-VKD  
**Attachments:** Letter re Initiating Documents and Waiver of Service - Cordova v. Huneault - NDCA - 25-cv-04685.pdf; Cordova v. Huneault - Complaint - 25-cv-04685-VKD.pdf; Cordova v. Huneault - Notice of Lawsuit - 25-cv-04685-VKD.pdf; Cordova v. Huneault - Waiver of the Service of Summons - 25-cv-04685-VKD.pdf; NDCA - ECF Registration Information.pdf; Notice of Assignment to Magistrate Judge with Election Form.pdf; Cordova v. Huneault - Order Setting Initial Conference - 25-cv-04685-VKD.pdf; Magistrate DeMarch i- Standing Order for Settlement Conferences.pdf; Magistrate DeMarchi - Standing Order for Civil Cases.pdf; Magistrate DeMarchi - Standing Order for Pretrial Preparation in Civil Cases.pdf

Dear Mr. Huneault,

Please see the attached letter and attachments regarding the above-captioned federal lawsuit filed against you in the Northern District of California. Pursuant to Federal Rule of Civil Procedure 4(d) and Local Civil Rule 4-2, I am formally requesting that you executed and return the attached Waiver of the Service of Summons to avoid the need for formal service. Your DMCA counter-notice dated on or about June 6, 2023, expressly stated that you consented to accept service of process. This request is consistent with that representation.

All required initiating documents are attached, including the Complaint, Notice of Lawsuit, partially completed AO 399 waiver form, and the relevant order and standing rules of the Court.

If you are represented by counsel, please forward this email to them immediately. Should you choose not to return the waiver within 30 days, I will seek early discovery or alternative service methods and ask the Court to impose those costs on you under Rule 4(d)(2).

Sincerely,

Randall S. Newman, Esq.  
99 Wall Street, Suite 3727  
New York, NY 10005  
(212) 797-3735  
[rsn@randallnewman.net](mailto:rsn@randallnewman.net)

Attorney for Plaintiff,  
Christopher J. Cordova

**rsn@randallnewman.net**

---

**From:** rsn@randallnewman.net  
**Sent:** Thursday, June 12, 2025 8:01 PM  
**To:** 'FrauditorTroll@gmail.com'  
**Subject:** Cordova v. Huneault - 25-cv-04685 - Follow-up on Waiver of Summons  
**Attachments:** Cordova v. Huneault - Initiating Documents and Waiver of Service Request - NDCA Case No. 25-cv-04685-VKD; Cordova v. Huneault - Notice of Lawsuit - 25-cv-04685-VKD.pdf; Cordova v. Huneault - Waiver of the Service of Summons - 25-cv-04685-VKD.pdf

Dear Mr. Huneault,

This is a follow-up to my June 6, 2025 email regarding the waiver of service of summons in *Cordova v. Huneault*, Case No. 25-cv-04685, pending in the U.S. District Court for the Northern District of California.

As previously noted, you filed a DMCA counter-notice with YouTube, in which you declared—under penalty of perjury—that you would accept service of process from Mr. Cordova or his agent. In keeping with that representation, I am proceeding in good faith by offering you the opportunity to waive formal service under Federal Rule of Civil Procedure 4(d).

For your convenience, I've reattached the Notice of Lawsuit and Request to Waive Service of Summons (AO 398), as well as a copy of my original email.

To avoid unnecessary costs and delay, I respectfully request that you return the signed waiver at your earliest convenience. If you are represented by counsel, please have them contact me directly regarding this matter.

Sincerely,

Randall S. Newman  
rsn@randallnewman.net  
(212) 797-3735

Attorney for Plaintiff,  
Christopher J. Cordova

**rsn@randallnewman.net**

---

**From:** rsn@randallnewman.net  
**Sent:** Monday, June 23, 2025 2:51 PM  
**To:** 'FrauditorTroll@gmail.com'  
**Subject:** Cordova v. Huneault (25-cv-04685-VKD) - Second Follow-Up: Waiver of Service  
**Attachments:** Cordova v. Huneault - Notice of Lawsuit - 25-cv-04685-VKD.pdf; Cordova v. Huneault - Waiver of the Service of Summons - 25-cv-04685-VKD.pdf; Cordova v. Huneault - Complaint - 25-cv-04685-VKD.pdf

Dear Mr. Huneault:

This is a second follow-up to my prior emails dated June 6 and June 13, 2025, regarding waiver of service of summons in *Cordova v. Huneault*, Case No. 25-cv-04685-VKD, pending in the United States District Court for the Northern District of California.

As previously noted, you declared—under penalty of perjury—in your DMCA counter-notices that you would accept service of process from Mr. Cordova or his agent. In reliance on that representation, I have continued to offer you the opportunity to waive formal service under Federal Rule of Civil Procedure 4(d).

To avoid the expense and potential consequences of formal service, I again request that you complete and return the signed Waiver of the Service of Summons form (AO 399), which remains attached for your convenience. Please be advised that your failure to sign and return the waiver—or to respond at all—may be brought to the Court's attention in connection with a motion for further relief.

If you are represented by counsel, I encourage you to have them contact me directly.

Randall S. Newman, Esq.  
99 Wall Street, Suite 3727  
New York, NY 10005  
(212) 797-3735  
[rsn@randallnewman.net](mailto:rsn@randallnewman.net)

Attorney for Plaintiff,  
Christopher J. Cordova

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CHRISTOPHER J CORDOVA

vs

JONATHAN HUNEALT AKA FRAUDITOR TROLL

*Plaintiff*

*Defendant*

N  
COURT DATE & TIME: AT  
INDEX #: 5:25-CV-04685-VKD  
DATE FILED: 06/05/2025  
Job #: 603428  
Client File#

RANDALL NEWMAN ESQ  
99 WALL STREET, SUITE 3727  
NEW YORK, NY 10005

**CLIENT'S FILE NO.:**

**AFFIRMATION OF DUE DILIGENCE**

I, ERIC RIVERA, a process server employed by Supreme Judicial Services Incorporated, with its principal place of business located at 371 Merrick Road Suite 202, Rockville Center, NY 11570, affirms and says that;

That I was instructed to effect service of the SUMMONS IN A CIVIL ACTION, COMPLAINT FOR COPYRIGHT INFRINGEMENT, 17 USC 101 ET SEQ, DECLARATION OF COPYRIGHT INFRINGEMENT, JURY TRIAL DEMANDED according to the C.P.L.R on JONATHAN HUNEALT AKA FRAUDITOR TROLL at 99 WALL STREET, NEW YORK, NY 10005

In my attempt to effect service on defendant I visited the address stated on the action and was unable with proper due diligence to serve JONATHAN HUNEALT AKA FRAUDITOR TROLL

07/01/2025 2:26PM 99 WALL STREET, NEW YORK, NY 10005 THERE IS NO DIRECTORY IN THE LOBBY. I SPOKE WITH THE MAILROOM ON THE PREMISES WHO STATED THEY CANNOT PROVIDE ANY INFORMATION ON ANY TENANTS IN THE BUILDING. THEY WOULD NOT CONFIRM IF THE DEFENDANT IS LOCATED IN THE BUILDING. I WAS UNABLE TO LOCATE THE DEFENDANT IN THE BUILDING WITHOUT A SUITE NUMBER.

I affirm this July 2, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



ERIC RIVERA  
1212873

*SUPREME JUDICIAL SERVICES, INC. 371 MERRICK ROAD - ROCKVILLE CENTRE, N.Y. 11570 LIC# 1092373*

7/12/25, 12:51 PM

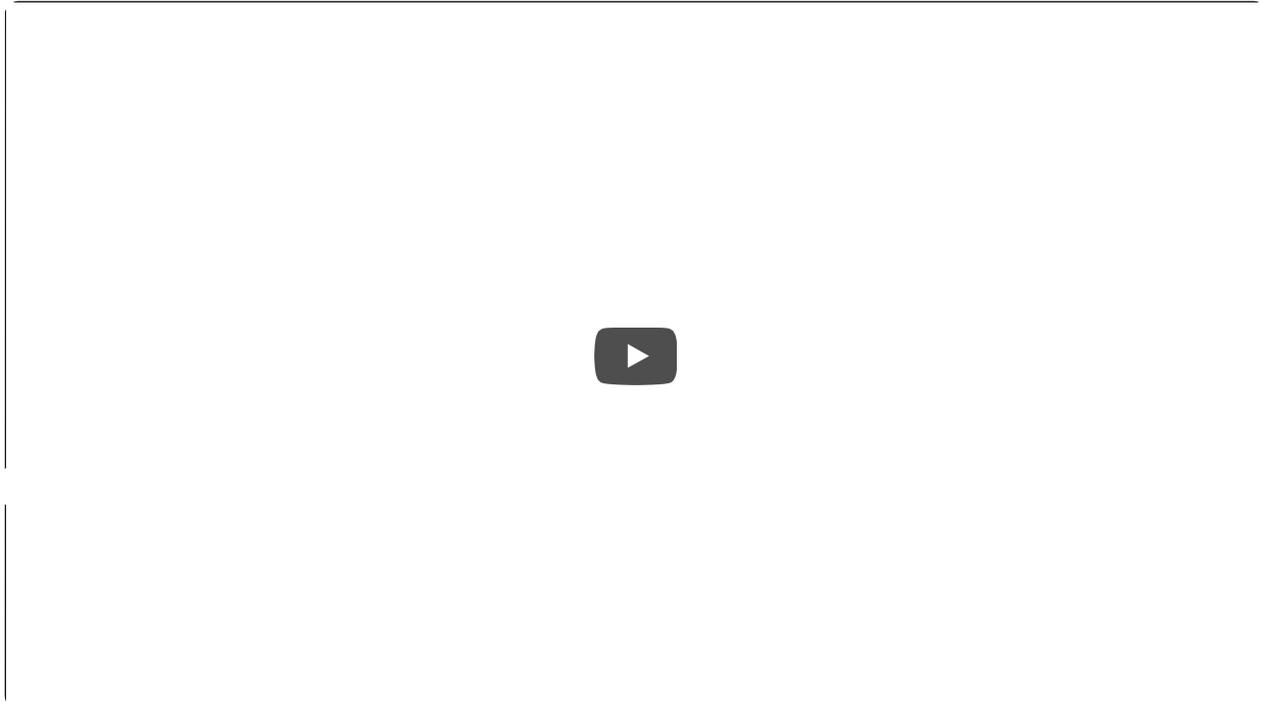
Frauditor FAPA Suffers TERRIBLE INJURY - Quits Frauditing - YouTube



frauditor troll



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### Frauditor FAPA Suffers TERRIBLE INJURY - Quits Frauditing



**Frauditor Troll**

67.5K subscribers

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1.3K



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14,175 views Jul 5, 2025

Frauditor sinks to a new low.

Check out my bodycam react channels: [@joshprime](#)

[@thebodycamspot](#)

[@toptierbodycam](#)

Check out my anti-nuisance streamer channel:

[@15minutesofshame](#)

Check out Nicole's True Crime channel: [@crimereality-yt](#)

FAPA

Join the anti frauditor subreddit:

[r/frauditors](#)

If you wish to support our channel financially here is the link to our PayPal:

<https://www.paypal.com/donate/?hosted...>

Please do not harass anyone featured in our videos

Thanks for Watching!!!

Please Like and Subscribe!!!

Frauditors

Police Videos

Police Body Cam

<https://www.youtube.com/watch?v=JSMHjwUSwJY>

1/4

7/12/25, 12:51 PM

Frauditor FAPA Suffers TERRIBLE INJURY - Quits Frauditing - YouTube



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### How this content was made

#### Auto-dubbed

Audio tracks for some languages were automatically generated. [Learn more](#)

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### Frauditor Troll

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- |   |  |  |
|---|--|--|
| <p>21:14</p> <p><b>Infrastructure: Last Week Tonight with John Oliver (HBO)</b></p> <p>LastWeekTonight ✓</p> <p>15M views · 10 years ago</p>                              | <p>9:32</p> <p><b>Fair Use on YouTube - BEST Tips for Avoiding Copyright on YouTube!!</b></p> <p>Ian Corzine ✓</p> <p>980K views · 6 years ago</p> | <p>20:46</p> <p><b>Corrie ten Boom's Message for the Modern Church [Special Guest Nan Gurley]</b></p> <p>Allen Jackson Now</p> <p>815 views · 5 hours ago</p> <p>New</p> |
| <p>19:00</p> <p><b>Sinclair Broadcast Group: Last Week Tonight with John Oliver (HBO)</b></p> <p>LastWeekTonight ✓</p> <p>13M views · 8 years ago</p>                     | <p>LIVE</p> <p><b>Webcam</b></p> <p>Alpengasthof Tannenalm</p> <p>5.5K watching</p>  | <p>10:48</p> <p><b>TheDMCALawyer Reacts to D'Arcy's Take on DMA v. FT - the Myths About the SOL and ...</b></p> <p>The DMCA Lawyer</p> <p>762 views · 2 weeks ago</p>    |
| <p>27:57</p> <p><b>FOOL'S 911 CALL BACKFIRES HARD !! BLACK HILLS FOREST CUSTER SOUTH DAKOTA</b></p> <p>Amagansett Press ✓</p> <p>158K views · 13 hours ago</p> <p>New</p> | <p>LIVE</p> <p><b>This Should be Good</b></p> <p>Harvey Freebird ✓</p> <p>86 watching</p>  | <p>30:01</p> <p><b>BLUE WATER WAVES   Relaxing Screensaver</b></p> <p>motics - Motion Backgrounds</p> <p>108K views · 7 years ago</p>                                    |

https://www.youtube.com/watch?v=JSMHjwUSwJY

2/4

7/12/25, 12:51 PM

Frauditor FAPA Suffers TERRIBLE INJURY - Quits Frauditing - YouTube



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<p>1:08:31</p> <p><b>F.U.M. Friday brought to You by PARSON SHIELD Presents: Dr. Parson</b></p> <p>ReallyCoolNews 438 views · Streamed 4 hours ago</p>	<p>3:14</p> <p><b>I'm DMA - Louis V (Official Video)</b></p> <p>Village Gang 73K views · 2 years ago</p>	<p>LIVE</p> <p><b>Webcam Saint-Malo</b></p> <p>Ville de Saint-Malo 3.4K watching</p>
--	--	--

<p>5:50</p> <p><b>Craig Hendry: Government is Problem with Society, Not Me</b></p> <p>ReallyCoolNews 249 views · 6 hours ago New</p>	<p>4:10</p> <p><b>End of Week Mystery 1A Audits Exposé Goes Dark</b></p> <p>ReallyCoolNews 198 views · 15 hours ago New</p>	<p>13:44</p> <p><b>IRL Streamers Get ARRESTED For BURGLARY LIVE..</b></p> <p>Atozy </p> <p>426K views · 1 day ago New</p>
--	---	---

<p>4:06</p> <p><b>Crystal F x John ODMGDIA x I'M DMA - Industriegebiet (Official Music Video) ...</b></p> <p>Village Gang 151K views · 3 years ago</p>	<p>29:06</p> <p><b>Firearm Testimony Blocked by Oregon Appellate Court - A Call to Action - June 25, 2025 (S5E94)</b></p> <p>John M. Collins at Critical Victories 4.6K views · 2 weeks ago</p>	<p>18:01</p> <p><b>Sheriff Shoots Judge: The Motive Nobody Wants To Talk About   #LetcherCounty #SheriffStines</b></p> <p>R&amp;M Productions 70K views · 1 day ago New</p>
--	---	---

9:51

**He Made \$500,000 from Faceless YouTube Channels in 90 Days**

vidIQ

1.2M views · 1 year ago

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7/12/25, 12:51 PM

Frauditor FAPA Suffers TERRIBLE INJURY - Quits Frauditing - YouTube










 191
 

 Reply


[23 replies](#)



@pauljcohen2007 7 days ago  
 FAPA was stress testing his foot.

 101
 

 Reply



 • 10 replies

@mikearst2940 7 days ago  
 I'm going to guess that he got the foot injury after kicking the wall when his mom told him it was high time he started buying his own Hot Pockets.

 49
 
 Reply


[5 replies](#)

@65cj55 7 days ago  
 He should of got a adult to help him lift it..

 62
 
 Reply


[1 reply](#)

@thayer0486 7 days ago  
 Sympathy and loss are suddenly farthest from my mind !!!! It was a Big, Beautiful, Plate indeed !!!!

 18
 
 Reply

@Chloe-nh6oj 7 days ago  
 I was quite surprised to find that FAPA has a major loss arising from a post office audit. Following his arrest, he filed the typical federal civil rights lawsuit. The federal magistrate roasted him by explaining why the police has full authority to trespass him and make the arrested after he failed to leave. Only in one of the footnotes did I see that the plaintiff in that lawsuit went by the channel name FAPA. It was comedy gold!

 36
 
 Reply


[23 replies](#)

@Laura-g7e7c 7 days ago  
 When is his court date for using the pepper spray on the elderly man ? Could this have something to do with it?

 55
 
 Reply


[13 replies](#)

@kevin982 6 days ago  
 My son dropped a dart board on his foot once. The pain was intense but, he was 8 at the time and it was my fault because I left on a chair. Those dart boards are real heavy, especially falling on to a young person's toes.

 3
 
 Reply


[1 reply](#)

@syndillucian 2 days ago  
 Well maybe his foot got broken some other way that would be even MORE embarrassing? Like he tangled with someone who REALLY objected to his behavior/attitude?

 2
 
 Reply

@PMWINKLE 5 days ago  
 i dont believe a thing that liar says

 1
 
 Reply

@alicialawhun91 7 days ago  
 He's full of crap. I'm a nursing assistant and have had residents that weigh over 200lbs accidentally step on my foot. And I've ran over my toe before with a hooyer lift while we've had a resident in it being transferred and didn't crush my toe. It hurt like hell but I didn't go to the hospital or miss work.

 19
 
 Reply


[8 replies](#)

7/12/25, 12:52 PM

15 Minutes of Shame - YouTube



frauditor troll



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# 15 Minute

@15MinutesofShame · 80.7K

More about this channel

[discord.gg/nqaRfCAk](https://discord.gg/nqaRfCAk) and 3 more links

Oldest

## 15 Minutes of Shame

### Links



Discord

[discord.gg/nqaRfCAk](https://discord.gg/nqaRfCAk)



Bodycam

[youtube.com/@joshprime](https://youtube.com/@joshprime)



Bodycam2

[youtube.com/@thebodycamspot](https://youtube.com/@thebodycamspot)



Bodycam3

[youtube.com/@TopTierBodycam](https://youtube.com/@TopTierBodycam)

### More info



View email address



[www.youtube.com/@15MinutesofShame](https://www.youtube.com/@15MinutesofShame)



Canada



Joined Sep 9, 2024



80.7K subscribers



194 videos



20,185,430 views

7/12/25, 12:52 PM

15 Minutes of Shame - YouTube



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## 15 Minutes of Shame

@15MinutesofShame · 80.7K subscribers

More about this channel

[discord.gg/nqaRfCAk](https://discord.gg/nqaRfCAk) and 3 more links

**Videos** | Shorts | Playlists | Posts

**ARRESTED in TEXAS on FELONY**

103K views · 8 days ago

---

**TikTok "Prankster" Wolfie Kahle Sentenced to PRISON**

107K views · 2 weeks ago

### Links

- Discord [discord.gg/nqaRfCAk](https://discord.gg/nqaRfCAk)
- Bodycam [youtube.com/@joshprime](https://youtube.com/@joshprime)
- Bodycam2 [youtube.com/@thebodycamspot](https://youtube.com/@thebodycamspot)
- Bodycam3 [youtube.com/@TopTierBodycam](https://youtube.com/@TopTierBodycam)

### More info

- www.youtube.com/@15MinutesofShame
- Canada
- Joined Sep 9, 2024
- 80.7K subscribers
- 194 videos
- 20,185,430 views

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## 15 Minutes of Shame

@15MinutesofShame · 80.7K subscribers

More about this channel

[discord.gg/nqaRfCAk](#) and 3 more links

92K views · 1 month ago

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Bodycam
[youtube.com/@joshprime](#)

Bodycam2
[youtube.com/@thebodycamspot](#)

Bodycam3
[youtube.com/@TopTierBodycam](#)

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### More info

✉ [www.youtube.com/@15MinutesofShame](#)

🌐 Canada

🕒 Joined Sep 9, 2024

👤 80.7K subscribers

📺 194 videos

📈 20,185,430 views

https://www.youtube.com/channel/UCmNPBFm\_kagXS3J\_agso0Pg

3/3

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Shirley Perlmutter*  
United States Register of Copyrights and Director

**Registration Number**  
**PA 2-457-989**

**Effective Date of Registration:**  
February 06, 2024

**Registration Decision Date:**  
March 05, 2024

## Title

**Title of Work:** ANOTHER CHAD EXPOSED!!! Worthless Denver Cops... ASSAULTED!!!

## Completion/Publication

**Year of Completion:** 2022  
**Date of 1st Publication:** March 16, 2022  
**Nation of 1st Publication:** United States

## Author

- Author:** Christopher John Cordova
- Author Created:** entire motion picture
- Citizen of:** *United States*
- Year Born:** 1982

## Copyright Claimant

**Copyright Claimant:** Christopher John Cordova  
4643 S. Lowell Blvd Unit B, Denver, CO, 80236

## Rights and Permissions

**Organization Name:** Denver Metro Audits  
**Name:** Christopher John Cordova  
**Email:** [denvermetroaudits@gmail.com](mailto:denvermetroaudits@gmail.com)

## Certification

**Name:** Christopher Cordova  
**Date:** February 06, 2024

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT
for the
Northern District of California

Plaintiff
v.
IN RE: DMCA SECTION 512(h)
SUBPOENA TO GOOGLE, LLC D/B/A YOUTUBE
Defendant
Civil Action No. 25-cv-04685-VKD

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: GOOGLE, LLC D/B/A YOUTUBE
C/O CORPORATION SERVICE CO., 2710 GATEWAY OAKS DR., SUITE 150N, SACRAMENTO, CA 95833
(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

SEE ATTACHMENT A

Place: VIA EMAIL ONLY: RSN@RANDALLNEWMAN.NET Date and Time:

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date:

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Christopher J. Cordova, who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

**ATTACHMENT A**

**DOCUMENTS TO BE PRODUCED UNDER SUBPOENA**

1  
2  
3 1. All identifying information, including the name(s), address(es), telephone  
4 number(s), email address(es), and IP address(es) for the user(s) associated with the  
5 following YouTube channel: <https://www.youtube.com/@FrauditorTroll>. Please  
6 include all identifying information provided when this channel was established, as well as  
7 all identifying information provided subsequently for billing, administrative or AdSense  
8 revenue purposes.

9 2. All identifying information, including the name(s), address(es), telephone  
10 number(s), email address(es), social media profile data, and IP address(es), for the users  
11 who posted, uploaded, downloaded or modified the data at the following  
12 URL: <https://youtu.be/I-J8sdKZ504?si=s9kES3XTGpURZ1A3>.



We received a counter notification (below) in response to a [copyright removal request](#) that you submitted. A counter notification is a legal request for YouTube to reinstate a video that was removed due to a copyright removal request.

You have **10 US business days** to reply to this counter notification. Your response **must include evidence that you've taken legal action against the uploader** to keep the content from being reinstated to YouTube. Usually, evidence would include a lawsuit against the uploader, which names the YouTube URL(s) at issue and seeks a court order to restrain the alleged infringement.

**Evidence should be submitted by replying directly to this email.** Do not send your reply to [copyright@youtube.com](mailto:copyright@youtube.com).

After 10 US business days, if we don't get a response from you, the content at issue may be reinstated to YouTube. You can find more information about the legal action you must take and what evidence is acceptable in our [Help Center](#).

- The YouTube Team

Counter Notification as follows:

Videos included in counter notification:

- <http://www.youtube.com/watch?v=I-J8sdKZ504>

Display name of uploader: Frauditor Troll

Hello and thank you for your time, I am once again asking you to forward my counter notification to the plaintiff so I can have a chance to defend myself in a court of Law. I have a commentary channel where I provide review videos of 1st amendment auditors, I provide commentary, I add memes and sound effects to completely transform the original work into a Fair use video. On my channel I have received 35 copyright strikes and every single one of my videos have been reinstated through the counter notification system. I am willing to defend myself in a court of law. I have already hired an attorney to defend my fair use videos in court and I am asking you to forward my counter notification to the plaintiff so he can decided for himself if he chooses to go that route. I am the original creator of the Fair use videos on my channel and I know that my videos were taken down by mistake because they fall under the Fair use act. Please forward my counter notification so I can defend myself in a court of Law. Thank you, Jonathan Huneault

I swear, under penalty of perjury, that I have a good faith belief the material was removed due to a mistake or misidentification of the material to be removed or disabled.

I consent to the jurisdiction of the Federal District Court for the district in which my address is located, or if my address is outside of the United States, the judicial district in which YouTube is located, and will accept service of process from the claimant.

Jonathan Huneault

Jonathan Huneault  
[99 Wall Street](#)  
[NY, 10005](#)  
[United States](#)

[Frauditortroll@gmail.com](mailto:Frauditortroll@gmail.com)

(917) 261-3199

[Help Center](#) • [Email Options](#)

7/12/25, 4:07 PM

Gmail - Fwd: [A6XYHLEJV4JPMNBTGLYCH36FRA] New Copyright Counter Notification

You received this email to provide information and updates around your YouTube channel or account.



© 2021 [Google LLC d/b/a YouTube](#), 901 Cherry Ave, San Bruno, CA 94066



We received a counter notification (below) in response to a copyright removal request that you submitted. A counter notification is a legal request for YouTube to reinstate a video that was removed due to a copyright removal request.

You have **10 US business days** to reply to this counter notification. Your response **must include evidence that you've taken legal action against the uploader** to keep the content from being reinstated to YouTube. Usually, evidence would include a lawsuit against the uploader, which names the YouTube URL(s) at issue and seeks a court order to restrain the alleged infringement.

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- The YouTube Team

Counter Notification as follows:

Videos included in counter notification:

- <http://www.youtube.com/watch?v=eVe4eoOzPvc>

Display name of uploader: Frauditor Troll

Hello and thank you for your time, I am once again asking you to forward my counter notification to the plaintiff so I can have a chance to defend myself in a court of Law. My videos are Fair Use and I am ready to defend myself in a court of law, you must forward this counter notification as it is my legal right to defend myself against this DMCA. I have a commentary channel where I provide review videos of 1st amendment auditors, I provide commentary, I add memes and sound effects to completely transform the original work into a Fair use video. On this channel I have received over 35 copyright strikes and every single video has been reinstated through the counter notification system. I am willing to defend myself in a court of law. I have already hired an attorney to defend my fair use videos in court and I am asking you to forward my counter notification to the plaintiff so he can decide for himself if he chooses to go that route. I am the original creator of the Fair use videos on my channel and I know that my videos were taken down by mistake because they fall under the Fair use act. Please forward my counter notification so I can defend myself in a court of Law. Thank you, Jonathan Huneault

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Jonathan Huneault

Jonathan Huneault  
99 Wall Street  
New York, NY 10005  
United States

[frauditortroll@gmail.com](mailto:frauditortroll@gmail.com)

(917) 261-3199

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Counter Notification as follows:

Videos included in counter notification:

- <http://www.youtube.com/watch?v=WO4jjYFpSsQ>

Display name of uploader: Frauditor Troll

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I swear, under penalty of perjury, that I have a good faith belief the material was removed due to a mistake or misidentification of the material to be removed or disabled.

I consent to the jurisdiction of the Federal District Court for the district in which my address is located, or if my address is outside of the United States, the judicial district in which YouTube is located, and will accept service of process from the claimant.

Jonathan Huneault

Jonathan Huneault  
99 Wall Street  
New York, NY 10005  
United States

[frauditortroll@gmail.com](mailto:frauditortroll@gmail.com)

(917) 261-3199

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- The YouTube Team

Counter Notification as follows:

Videos included in counter notification:

- [http://www.youtube.com/watch?v=\\_xAB\\_dhJSr8](http://www.youtube.com/watch?v=_xAB_dhJSr8)

Display name of uploader: Frauditor Troll

Hello and thank you for your time, I am once again asking you to forward my counter notification to the plaintiff so I can have a chance to defend myself in a court of Law. I have a commentary channel where I provide review videos of 1st amendment auditors, I provide commentary, I add memes and sound effects to completely transform the original work into a Fair use video. On this channel I have received over 35 copyright strikes and every single video has been reinstated through the counter notification system. I am willing to defend myself in a court of law. I have already hired an attorney to defend my fair use videos in court and I am asking you to forward my counter notification to the plaintiff so he can decide for himself if he chooses to go that route. I am the original creator of the Fair use videos on my channel and I know that my videos were taken down by mistake because they fall under the Fair use act. Please forward my counter notification so I can defend myself in a court of Law. Thank you, Jonathan Huneault

I swear, under penalty of perjury, that I have a good faith belief the material was removed due to a mistake or misidentification of the material to be removed or disabled.

I consent to the jurisdiction of the Federal District Court for the district in which my address is located, or if my address is outside of the United States, the judicial district in which YouTube is located, and will accept service of process from the claimant.

Jonathan Huneault

Jonathan Huneault  
99 Wall Street  
New York, NY 10005  
United States

[frauditortroll@gmail.com](mailto:frauditortroll@gmail.com)

(917) 261-3199

[Help Center](#) • [Email Options](#)

You received this email to provide information and updates around your YouTube channel or account.



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We received a counter notification (below) in response to a copyright removal request that you submitted. A counter notification is a legal request for YouTube to reinstate a video that was removed due to a copyright removal request.

You have **10 US business days** to reply to this counter notification. Your response **must include evidence that you've taken legal action against the uploader** to keep the content from being reinstated to YouTube. Usually, evidence would include a lawsuit against the uploader, which names the YouTube URL(s) at issue and seeks a court order to restrain the alleged infringement.

**Evidence should be submitted by replying directly to this email.** Do not send your reply to [copyright@youtube.com](mailto:copyright@youtube.com).

After 10 US business days, if we don't get a response from you, the content at issue may be reinstated to YouTube. You can find more information about the legal action you must take and what evidence is acceptable in our Help Center.

- The YouTube Team

Counter Notification as follows:

Videos included in counter notification:

- <http://www.youtube.com/watch?v=4OK8icQxroQ>

Display name of uploader: Frauditor Troll

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