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9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN JOSE DIVISION**

12 CHRISTOPHER J. CORDOVA,

13 Plaintiff,

14 vs.

15 JOHN DOE 1 d/b/a

16 www.youtube.com/@Destination2Truth,

17 Defendant.

Case No.

**COMPLAINT**

**FOR:**

- 18 **1. Copyright Infringement, 17 U.S.C. §§ 101 et seq.**
- 19 **2. Declaration of Copyright Infringement**

**JURY TRIAL DEMANDED**

1 Plaintiff, Christopher J. Cordova a/k/a Denver Metro Audits (“Plaintiff”), files this  
2 action against an unknown individual who operates the YouTube channel located at the  
3 URL [www.youtube.com/@Destination2Truth](http://www.youtube.com/@Destination2Truth) (“Defendant”) and alleges as follows:

#### 4 **INTRODUCTION**

5 1. This case arises from the unauthorized use of a copyrighted video titled  
6 “*Another Chad Exposed!!! Worthless Denver Cops...ASSAULTED!!!*” (the “Registered  
7 Video”) created and published by Plaintiff on his YouTube channel “Denver Metro Audits”  
8 (@DenverMetroAudits). The 48-minute, 14-second video captures a real-time  
9 confrontation between Plaintiff, members of the Denver Police Department, and a third-  
10 party bystander. It was filmed and released to expose potential police misconduct and  
11 promote public accountability.

12 2. Defendant, a YouTube content creator operating under the alias “Destination  
13 2Truth,” republished more than 90% of Plaintiff’s original video (excluding intro)—over  
14 42 minutes of expressive footage.

#### 15 **JURISDICTION AND VENUE**

16 3. This action arises under the Copyright Act, 17 U.S.C. § 101 *et seq.*, and  
17 includes a claim for Declaratory Relief under 28 U.S.C. § 2201.

18 4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and  
19 1338(a).

20 5. Venue is proper in this District pursuant to 28 U.S.C. § 1400(a) and § 1391(b),  
21 as the infringing content was published and distributed via YouTube, a platform  
22 headquartered in this District.

#### 23 **PARTIES**

24 6. Plaintiff Christopher J. Cordova is a resident of Colorado and the creator and  
25 operator of the YouTube channel “Denver Metro Audits” (@DenverMetroAudits).

26 7. Defendant is an unknown individual operating a YouTube channel at the URL  
27 [www.youtube.com/@Destination2Truth](http://www.youtube.com/@Destination2Truth).

**FACTUAL ALLEGATIONS**

1  
2 8. On or about March 16, 2022, Plaintiff published the Registered Video to his  
3 YouTube channel @DenverMetroAudits where it was made available to the public. The  
4 video was filmed, edited, and published by Plaintiff as part of his ongoing effort to  
5 document public accountability and government conduct. Plaintiff’s video is available at  
6 the URL: <https://youtu.be/bhgHsPl4Mr0?si=F-7EgMg0bBZiy-QY>.

7 9. The Registered Video was filmed, edited, and released as an original,  
8 standalone work.

9 10. Plaintiff registered the video with the U.S. Copyright Office under  
10 Registration Number PA002457989 on February 6, 2024.

11 11. Defendant operates a YouTube channel under the name “Destination 2Truth,”  
12 which routinely republishes copyrighted videos ([www.youtube.com/@Destination2Truth](http://www.youtube.com/@Destination2Truth)).

13 12. In June, 2025, Plaintiff discovered that Defendant had previously published a  
14 video using large portions of Plaintiff’s Registered Video (the “Infringing Video”) to his  
15 YouTube channel at the URL: <https://www.youtube.com/watch?v=YLUC9S3DtyA>.

16 13. Defendant did not obtain permission or a license from Plaintiff to use the  
17 Registered Video in the Infringing Video.

18 14. The Infringing Video includes over 42 minutes of Plaintiff’s copyrighted  
19 content.

20 15. The Infringing Video includes three uninterrupted segments of 9:39, 8:06, and  
21 9:45, respectively.

22 16. Defendant did not obtain a license or authorization to use any portion of the  
23 Registered Video and did not add *any* commentary during these extended portions.

24 17. After witnessing Defendant's blatant copyright infringement, Plaintiff  
25 exercised his rights under copyright law. On or about June 13, 2025, Plaintiff submitted a  
26 valid takedown notice to YouTube for the unauthorized use of the Registered Video.

27 18. On or about June 16, 2025, YouTube removed the Infringing Video.  
28

1 19. To date, Defendant has not filed a counter-notification pursuant to 17 U.S.C.  
2 § 512(g).

3 20. Plaintiff now seeks damages, declaratory and injunctive relief for post-  
4 registration infringement pursuant to the Copyright Act.

5 **FIRST CAUSE OF ACTION**

6 **Copyright Infringement, 17 U.S.C. § 501**

7 21. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1  
8 through 20.

9 22. Plaintiff is the author and sole owner of all rights in the Registered Video  
10 registered with the U.S. Copyright Office under Registration No. PA0002457989.

11 23. Defendant copied, displayed, and distributed substantial portions of Plaintiff's  
12 video without authorization.

13 24. Defendant incorporated more than 42 minutes of Plaintiff's copyrighted work  
14 into the Infringing Video published on YouTube, without a license or permission.

15 25. Defendant's use of the Registered Video was for commercial purposes,  
16 including monetization through advertisements and promotion of merchandise.

17 26. Defendant's use of the Registered Video was not transformative and does not  
18 qualify as Fair Use.

19 27. As a result of Defendant's infringement, Plaintiff has suffered actual damage  
20 including lost viewership, lost revenue, reputational harm, and diminution of the market  
21 value of the Registered Video.

22 28. Plaintiff is entitled to recover statutory damages pursuant to 17 U.S.C. §  
23 504(c), or alternatively, actual damages and Defendant's profits pursuant to 17 U.S.C. §  
24 504(b).

25 29. Plaintiff is further entitled to injunctive relief, attorney's fees, and costs  
26 pursuant to 17 U.S.C. §§ 502 and 505.

1 **SECOND CAUSE OF ACTION**

2 **Declaration of Copyright Infringement, 28 U.S.C. § 2201**

3 30. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1  
4 through 29.

5 31. An actual and justiciable controversy exists between Plaintiff and Defendant  
6 concerning Defendant's use of Plaintiff's Registered Video.

7 32. Plaintiff contends that Defendant's use of Plaintiff's Registered Video  
8 constitutes copyright infringement pursuant to 17 U.S.C. § 501 and is not protected under  
9 the doctrine of fair use.

10 33. Defendant apparently believes that his use of the Registered Video is  
11 protected by 17 U.S.C. § 107 as stated in his channel description below:

12 We would also like to include that if you see one or more videos that you  
13 personally recorded on our channel, Then we ask that you educate urself [sic]  
14 with the FAIR USE ACT, Which Allows you're [sic] video to be used on other  
15 channels other then you're [sic] own channel, So as we say, KNOWLEDGE  
16 IS POWER - Thank You.

17 34. Plaintiff seeks a judicial declaration under 28 U.S.C. § 2201 that Defendant's  
18 unauthorized use of the Registered Video constitutes copyright infringement and is not  
19 protected by 17 U.S.C. § 107.

20 **PRAYER FOR RELIEF**

21 **WHEREFORE**, Plaintiff, Christopher J. Cordova, prays for judgment against  
22 Defendant as follows:

- 23 A. That judgment be entered in favor of Plaintiff and against Defendant;  
24  
25 B. The Court enter a declaratory judgment that Defendant's use of the Registered  
26 Video constitutes copyright infringement and is not protected by the doctrine  
27 of fair use;  
28

- 1 C. A permanent injunction enjoining Defendant from further use of the  
2 Registered Video and requiring YouTube and any third-party platforms under  
3 Defendant's control to remove the Infringing Video and prevent further  
4 dissemination;  
5 D. An award of monetary damages in an amount to be determined at trial;  
6 E. An award of attorneys' fees and costs pursuant to 17 U.S.C. § 505;  
7 F. Any other relief the Court deems just and proper.  
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9 **JURY TRIAL DEMANDED**

10  
11 Dated: June 20, 2025

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