

1 RANDALL S. NEWMAN (SBN 190547)  
2 Attorney at Law  
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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  
12 CHRISTOPHER J. CORDOVA,

13 Plaintiff,

14 vs.

15  
16 JONATHAN HUNEALT,

17 Defendant.  
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Case No. 5:25-cv-04685-VKD

**DECLARATION OF RANDALL S.  
NEWMAN IN SUPPORT OF  
*EX PARTE* APPLICATION FOR  
PRESERVATION ORDER**



1 6. At the time the Complaint was filed, Defendant's Frauditor Troll Channel  
2 contained approximately 1,990 videos. A copy of statistics from Defendant's channel,  
3 obtained from Socialblade.com, is attached hereto as **Exhibit D**.

4 7. On June 6, 2025, the same day Defendant received my email regarding this  
5 lawsuit, he deleted approximately 28 videos from the Frauditor Troll Channel. (See **Exhibit**  
6 **D**).

7 8. Defendant subsequently continued removing videos from his channel,  
8 including the Infringing Video at issue in this lawsuit. (See **Exhibit D** and URL  
9 <https://youtu.be/I-J8sdKZ504?si=s9kES3XTGpURZ1A3>.)

10 9. Attached hereto as **Exhibit E** is a screenshot of the above URL, showing that  
11 the Infringing Video was removed by Defendant after the Complaint was filed and after he  
12 received notice of this lawsuit.

13 10. On June 13, 2025, I sent a follow-up email to Defendant regarding the waiver  
14 of service. A copy of that email is attached hereto as **Exhibit F**.

15 11. Defendant deleted 27 videos on June 13 and 7 more on June 14. (See **Exhibit**  
16 **D**).

17 12. Thereafter, Defendant deleted approximately 141 videos on June 16; 19  
18 videos on June 17; 1,197 videos on June 18; 287 videos on June 19; and 2 videos on June  
19 21. (See **Exhibit D**).

20 13. In total, Defendant has deleted more than 1,700 videos from his YouTube  
21 channel, close to 90% of the channel's portfolio.

22 14. A screenshot of the Frauditor Troll Channel as of the date of this filing is  
23 attached hereto as **Exhibit G**.

24 15. As of the date of this filing, only 286 videos remain on the Frauditor Troll  
25 Channel. (See **Exhibits D and G**).

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Defendant has previously acknowledged retaining counsel to defend his alleged fair use of Plaintiff's videos. Plaintiff does not suggest that this particular counter-notice refers to the Registered Video.

1 16. Defendant has not responded to either of the emails referenced above.

2 17. Given Defendant's conduct, including the mass deletion of videos and failure  
3 to communicate, it is necessary for the Court to issue a Preservation Order directed to both  
4 YouTube (Google LLC) and Defendant, requiring the preservation of all electronic  
5 evidence relevant to the Frauditor Troll Channel and this litigation.

6 18. I did not provide advance notice of this application due to Defendant's  
7 conduct and his failure to respond to multiple prior communications. Preservation is  
8 warranted to prevent further loss of material evidence relevant to Plaintiff's claims.

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

11 Executed on this 21st day of June, 2025, in Bangkok, Thailand.

12  
13 s/ Randall S. Newman

14 Randall S. Newman  
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# 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 P. Weimer*  
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

[rsn@randallnewman.net](mailto: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.

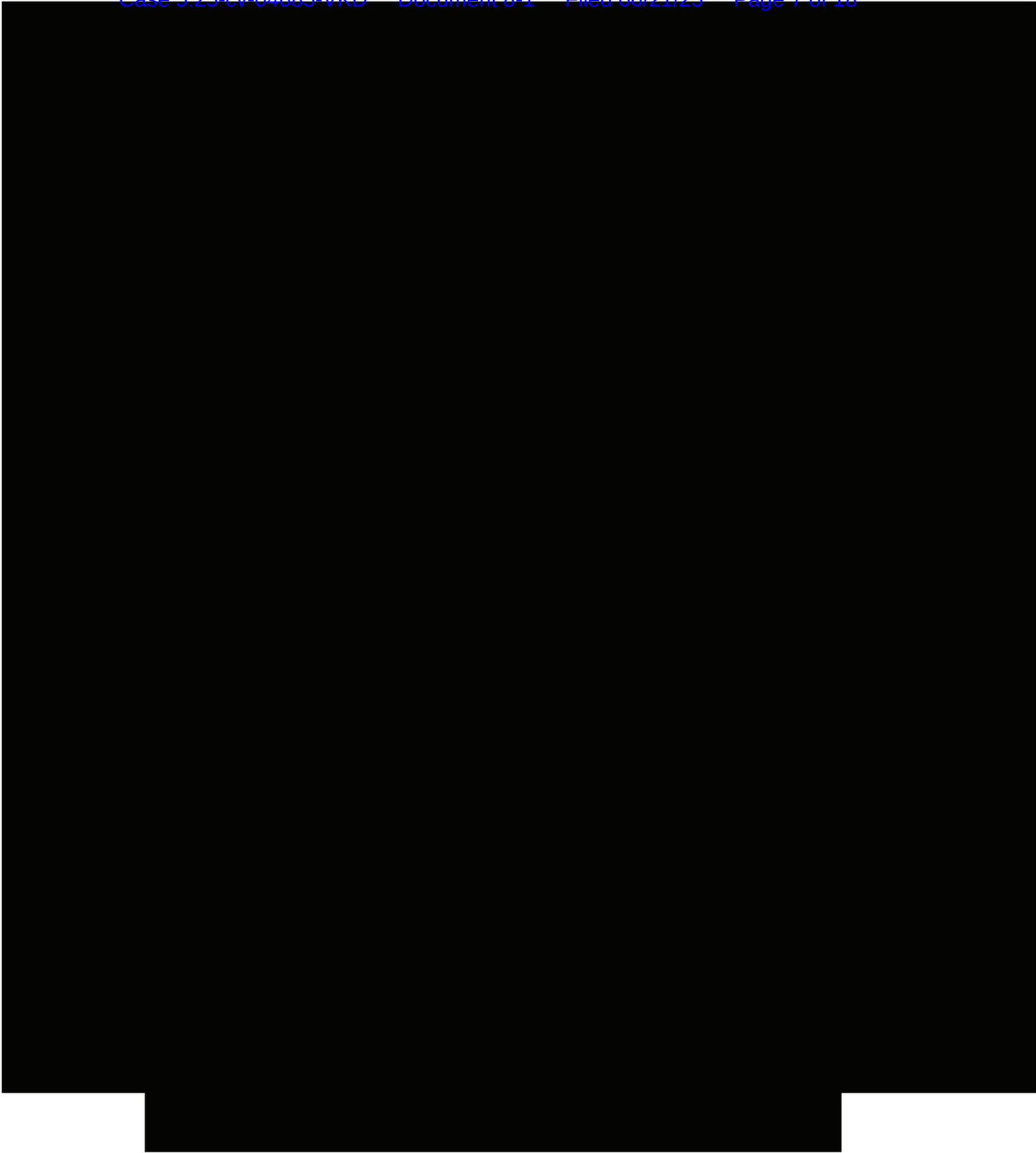
All required initiating documents are attached, including the Complaint, Notice of Lawsuit, partially completed AO 399 waiver form, and the relevant order and standing rules of the Court.

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



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:

- [REDACTED]

Display name of uploader: Frauditor Troll

I am once again asking you to forward this counter notification to the plaintiff, according to the fair use act of 1976 I am legally allowed to make these types of videos. 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 48 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 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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SOCIAL BLADE

YouTube TikTok Twitch Facebook Instagram

# FRAUDITOR TROLL



Frauditor Troll @frauditortroll

Refresh stats

Favorite

Subscribers

68K

Views

9.7M

Videos

286

Created On

Jan 4, 2022

Channel Statistics

Video Statistics

Future Projections

Similar Channels

Live Subscriber Count

C-  
Grade

1,219,039th  
SB Rank

2,527th  
Subscribers Rank

1,312,252nd  
Views Rank

TBD  
Country Rank

2,318th  
Entertainment Rank

CREATOR STATISTICS

### SOCIAL BLADE

YouTube TikTok Twitch Facebook Instagram

# -53M

Views for the last 30 days

# \$0 - \$0

Monthly Estimated Earnings

# \$0 - \$0

Yearly Estimated Earnings

#### Daily Channel Metrics

Last 30 Days

Date	Subscribers	Views	Videos	Estimated
Fri 2025-05-23	+100 67.3K	+25,264 62,703,799	-- 1,990	\$6 - \$101
Sat 2025-05-24	-- 67.3K	+10,699 62,714,498	-- 1,990	\$3 - \$43
Sun 2025-05-25	-- 67.3K	+19,087 62,733,585	+1 1,991	\$5 - \$76
Mon 2025-05-26	-- 67.3K	+28,524 62,762,109	-- 1,991	\$7 - \$114
Tue 2025-05-27	-- 67.3K	+24,339 62,786,448	-- 1,991	\$6 - \$97
Wed 2025-05-28	-- 67.3K	+18,984 62,805,432	-- 1,991	\$5 - \$76
Thu 2025-05-29	-- 67.3K	+7,342 62,812,774	-- 1,991	\$2 - \$29
Fri 2025-05-30	+100 67.4K	+25,947 62,838,721	-- 1,991	\$6 - \$104
Sat 2025-05-31	-- 67.4K	+15,470 62,854,191	-- 1,991	\$4 - \$62
<b>Daily Average</b>	+10	-1,765,800	-57	\$0 - \$0
<b>Weekly Average</b>	0	-51,954,472	-1,648	\$0 - \$0
<b>Last 30 Days</b>	+300	-52,973,990	-1,702	\$0 - \$0

SOCIAL BLADE

YouTube	TikTok	Twitch	Facebook	Instagram					
Mon	2025-06-02	--	67.4K	+17,818	62,888,007	--	1,991	\$4	\$70
Tue	2025-06-03	--	67.4K	+34,371	62,920,378	+1	1,992	\$9	\$137
Wed	2025-06-04	--	67.4K	+20,647	62,941,025	--	1,992	\$5	\$83
Thu	2025-06-05	--	67.4K	+16,899	62,957,924	--	1,992	\$4	\$68
Fri	2025-06-06	+100	67.5K	+18,648	62,976,572	-28	1,964	\$5	\$75
Sat	2025-06-07	--	67.5K	-649,296	62,327,276	--	1,964	\$0	\$0
Sun	2025-06-08	--	67.5K	+17,914	62,345,190	--	1,964	\$4	\$72
Mon	2025-06-09	--	67.5K	-56,019	62,289,171	-1	1,963	\$0	\$0
Tue	2025-06-10	--	67.5K	-85,609	62,203,562	--	1,963	\$0	\$0
Wed	2025-06-11	--	67.5K	-1,017	62,202,545	--	1,963	\$0	\$0
Thu	2025-06-12	--	67.5K	+6,352	62,208,897	--	1,963	\$2	\$25
Fri	2025-06-13	--	67.5K	-560,949	61,647,948	-27	1,936	\$0	\$0
Sat	2025-06-14	--	67.5K	+22,307	61,670,255	-7	1,929	\$6	\$89
Sun	2025-06-15	--	67.5K	-197,158	61,473,097	--	1,929	\$0	\$0
Mon	2025-06-16	--	67.5K	-8,466	61,464,631	-141	1,788	\$0	\$0
Tue	2025-06-17	--	67.5K	-4,780,648	56,683,983	-19	1,769	\$0	\$0
Wed	2025-06-18	--	67.5K	-783,492	55,900,491	-1,194	575	\$0	\$0
Thu	2025-06-19	--	67.5K	-46,209,248	9,691,243	-287	288	\$0	\$0
Fri	2025-06-20	--	67.5K	+2,233	9,693,476	--	288	\$1	\$9
Sat	2025-06-21	--	67.5K	+3,823	9,697,299	-2	286	\$1	\$15
Daily Average		+10		1,785,800		57		\$0	\$0

GAINED SUBSCRIBERS (WEEKLY)



### SOCIAL BLADE

YouTube TikTok Twitch Facebook Instagram



#### RECENT VIDEO



**FRAUDITOR GETS LAWSUIT DISMISSED!!! MASSIVE FAIL!!**

Uploaded 3 months ago

**Views**  
22K

**Likes**  
1.7K

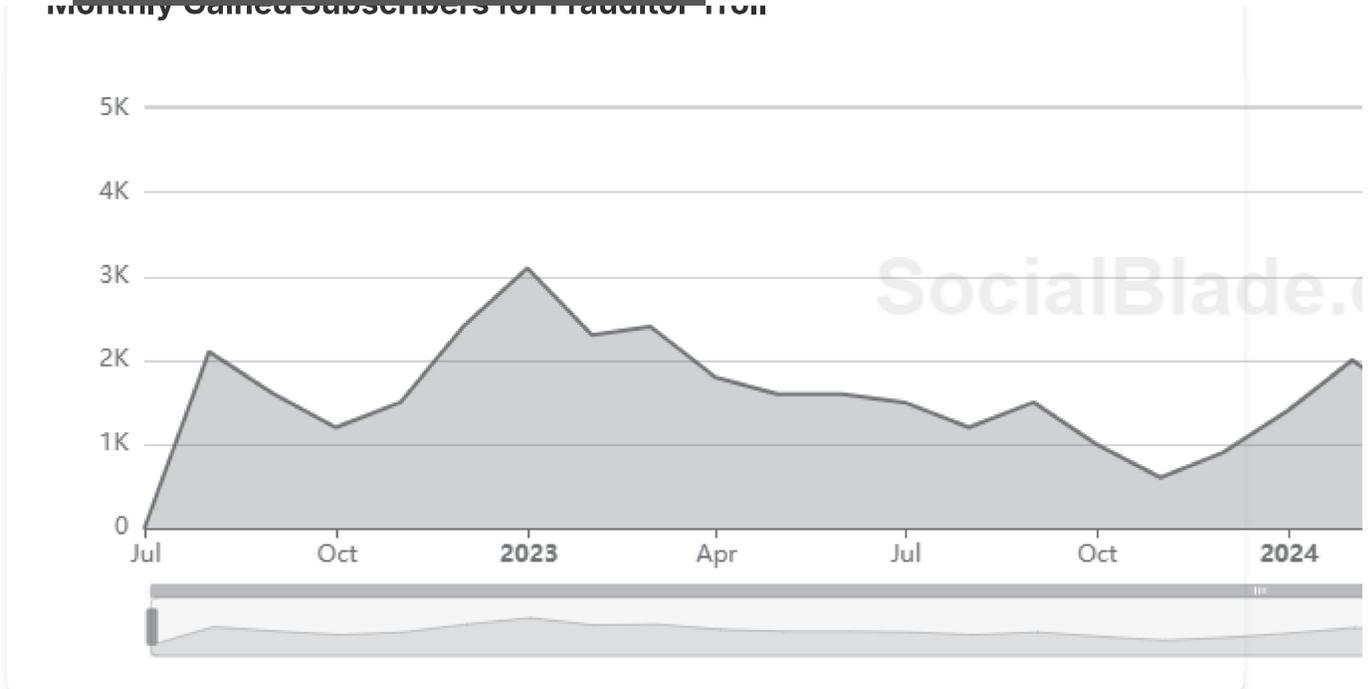
**Comments**  
617

[Go to Video Statistics](#)

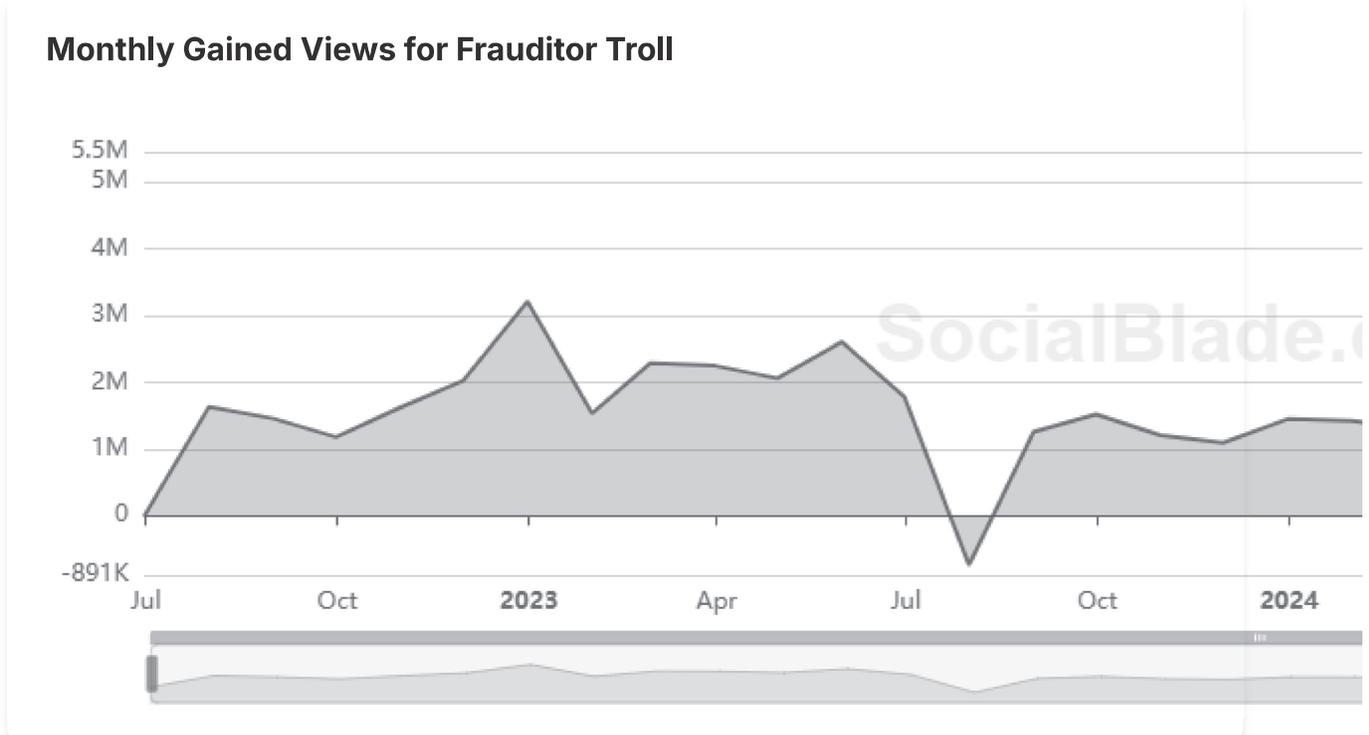
### SOCIAL BLADE

YouTube TikTok Twitch Facebook Instagram

Monthly Gained Subscribers for Frauditor Troll



Monthly Gained Views for Frauditor Troll



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EXHIBIT D - Page 5 of 6

# SOCIAL BLADE

YouTube TikTok Twitch Facebook Instagram

## About

- About Us
- Terms of Service
- Privacy Policy
- Meet the Team
- Press Inquiries
- Contact Us

## More Social Blade

- Social Blade Blog
- Social Blade Business API
- YouTube EDU
- YouTube Consulting
- YouTube Money Calculator / Estimated Earnings

## Helpful Pages

- Connect Your Social Media
- Find Influencers - Run Reports
- Remove Ads & Get More Features
- Join our Discord

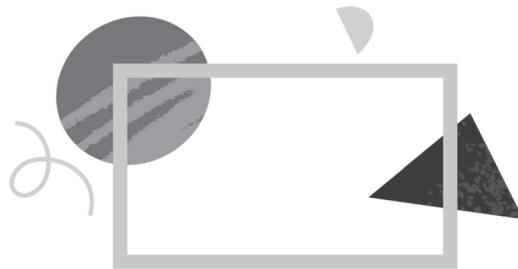
*b8122cf4*



Search



+ Create



## Video unavailable

This video has been removed by the uploader

[GO TO HOME](#)

**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

YouTube TH

frauditor troll

Home

Shorts

Subscriptions

You

# FRAUDITOR TROLL

## Frauditor Troll

@frauditortroll · 67.5K subscribers · 286 videos

Let's get to 100 000 Subscribers! ...more

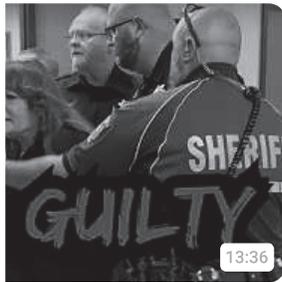
paypal.com/donate/?hosted\_button\_id=EH57TSQYEEKCC and 6 more links

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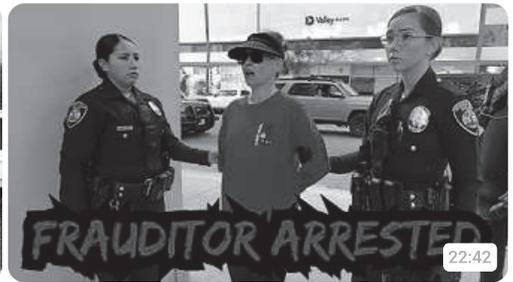
ICTED + FRAUDITOR

10K views · 6 days ago



NEW ANTI-FRAUDITOR LAW WILL COMPLETELY DESTROY THEM!!!

38K views · 2 months ago



FRAUDITOR GETS ARRESTED FOR BATTERY

21K views · 1 month ago



Frauditor Sergeant

26K views



FRAUDITOR ARRESTED AFTER CASING OUT BANK

10K views · 6 days ago



FRAUDITOR GETS HANDCUFFED, IDENTIFIED...

14K views · 7 days ago



FRAUDITOR AUDITING AMERICA GETS DENIED AN...

21K views · 2 weeks ago



FRAUDITOR SLAMMED TO THE GROUND DURING EPIC...

27K views · 1 month ago



FRAUDITOR BIRDBRA

22K views



# FRAUDITOR TROLL

## Frauditor Troll

@frauditortroll · 67.5K subscribers · 286 videos

Let's get to 100 000 Subscribers!

paypal.com/donate/?hosted\_button\_id=EH57TSQYEEKCC and 6 more links

ideos Playlists Posts

view this playlist

als

**Josh Prime 2**  
92.8K subscribers  
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**Josh Prime Unfiltered**  
30.2K subscribers  
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**Josh Prime Gaming**  
7.02K subscribers  
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**Simple Delicious Desserts**  
1.36K subscribers  
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