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

11 CHRISTOPHER J. CORDOVA,

12 Plaintiff,

13 vs.

14 JONATHAN HUDON-HUNEALD,
15 NNEKA OHIRI,

16 Defendants.

Case No. 25-cv-04685-VKD

**AMENDED COMPLAINT
FOR:**

- 17 **1. Copyright Infringement, 17 U.S.C.
§§ 101 et seq.**
- 18 **2. Misrepresentation, 17 U.S.C. §
512(f);**
- 19 **3. Declaration of Copyright
20 Infringement**

1 Plaintiff, Christopher J. Cordova (“Plaintiff”), files this Amended Complaint (the
2 “Complaint”) against Defendants Jonathan Hudon-Huneault (“Huneault”) and Nneka Ohiri
3 (“Ohiri”) (Huneault and Ohiri are collectively referred to as “Defendants”) who operate
4 the Frauditor Troll YouTube channel located at www.youtube.com/@frauditortroll (the
5 “Frauditor Troll Channel”) and alleges as follows:

6 **INTRODUCTION**

7 1. This case addresses the growing misuse of the counter-notice process under
8 the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512 *et seq.*, by “reaction”
9 channel operators who assert an unlimited version of fair use, one so overbroad that, if
10 accepted, it would render copyright protection on YouTube meaningless.

11 2. A rising class of YouTube creators has built profitable channels on wholesale
12 appropriation of others’ copyrighted works, contributing little or nothing in the way of
13 genuine transformation. Their videos often consist of lengthy, unaltered segments of
14 original creators’ footage, broken up by occasional remarks, sound effects, or memes, and
15 are then monetized through YouTube’s Partner Program under the mantra of “fair use.”

16 3. While courts have upheld some reaction videos as fair use, those rulings
17 emphasize frequent commentary, structured critique, and a transformative purpose. In
18 contrast, many “mockumentary-style” infringers splice original footage with token
19 interjections meant to ridicule, not analyze, stacking multiple acts of infringement as if that
20 alone transforms the work. If this overbroad interpretation of fair use were accepted, it
21 would effectively nullify copyright enforcement on YouTube: any user could repost entire
22 videos, add a few quips or visual effects, and claim immunity. Such a precedent would
23 strip creators of meaningful control over their work, undermine YouTube’s enforcement
24 system, and incentivize large-scale monetization of stolen content.

25 4. This erosion of copyright protections has been fueled, in part, by systematic
26 abuse of the DMCA’s counter-notice process. When copyright owners like Plaintiff submit
27 takedown notices under 17 U.S.C. § 512(c), reaction channel operators frequently respond
28

1 with boilerplate counter-notices under § 512(g), swearing under penalty of perjury that
2 their uploads are protected by fair use.

3 5. In July and October 2023, Huneault submitted at least nine counter-notices to
4 YouTube pursuant to § 512(g)(3) (the “Counter-Notices”), each seeking to compel
5 reinstatement of videos on the Frauditor Troll Channel that incorporated substantial
6 portions of Plaintiff’s copyrighted works without authorization. A copy of the Counter-
7 Notices is attached hereto as Exhibit A.

8 6. Each Counter-Notice submitted by Defendants under penalty of perjury
9 contained substantially identical boilerplate language, including the following:

10 I am once again asking you to forward this counter notification to the plaintiff,
11 according to the fair use act of 1976 I am legally allowed to make these types
12 of videos. I am once again asking you to forward my counter notification to
13 the plaintiff so I can have a chance to defend myself in a court of Law. I have
14 a commentary channel where I provide review videos of 1st amendment
15 auditors, I provide commentary, I add memes and sound effects to completely
16 transform the original work into a Fair use video. On my channel I have
17 received 48 copyright strikes and every single one of my videos have been
18 reinstated through the counter notification system. I am willing to defend
19 myself in a court of law. I have already hired an attorney to defend my fair
20 use videos in court and I am asking you to forward my counter notification to
21 the plaintiff so he can decided for himself if he chooses to go that route. I am
22 the original creator of the Fair use videos on my channel and I know that my
23 videos were taken down by mistake because they fall under the Fair use act.
24 Please forward my counter notification so I can defend myself in a court of
25 Law. Thank you, Jonathan Huneault

26 7. These statements are conclusory and mirror the kind of boilerplate language
27 reaction channels often deploy without conducting any individualized fair-use analysis.
28 Rather than assessing the amount, substantiality, or transformative nature of the copied

1 material, Defendants relied on a one-size-fits-all legal script untethered from the actual
2 content at issue.

3 8. As detailed below, these Counter-Notices were materially false and
4 knowingly submitted to manipulate YouTube’s copyright enforcement process and
5 reinstate videos that overwhelmingly consist of Plaintiff’s unaltered footage.

6 9. In addition to falsely claiming fair use, Huneault misrepresented ownership.
7 Each Counter-Notice asserted that Huneault was “the original creator of the Fair Use videos
8 on my channel.” In reality, Google’s records confirm that the Frauditor Troll Channel is
9 owned and monetized by Ohiri, not Huneault. This misrepresentation of ownership,
10 combined with the use of a fictitious U.S. service address and repeated false statements
11 about fair use, was a calculated effort to manipulate YouTube’s enforcement process and
12 obstruct Plaintiff’s ability to enforce his rights.

13 10. Plaintiff brings this action under the Copyright Act for Defendants’ direct
14 infringement of one of Plaintiff’s copyrighted works and for Defendants’ knowing and
15 material misrepresentations in Counter-Notices submitted under 17 U.S.C. § 512(g).
16 Plaintiff seeks damages, declaratory and injunctive relief, and all other remedies available
17 under the Copyright Act to prevent further infringement and abuse of the DMCA process.

18 **JURISDICTION AND VENUE**

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

21 12. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and
22 1338(a), as this case involves federal questions arising under the Copyright Act and the
23 Digital Millennium Copyright Act.

24 13. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and 1400(a)
25 because a substantial part of the events giving rise to the claims occurred here and the
26 infringing content was published and distributed via YouTube, which maintains its
27 principal U.S. operations in this District.

1 14. Defendants consented to jurisdiction in this District by submitting the
2 Counter-Notices under 17 U.S.C. § 512(g)(3).

3 **PARTIES**

4 15. Plaintiff is a resident of Colorado and the creator and operator of the YouTube
5 channel “Denver Metro Audits” (@DenverMetroAudits) (the “DMA Channel”).

6 16. Ohiri is an individual residing in Canada who owns the Frauditor Troll
7 Channel.

8 17. Huneault is an individual residing in Canada who serves as the voice and
9 narrator for videos on the Frauditor Troll Channel. Based upon information and belief
10 Huneault and Ohiri are married or are domestic partners.

11 **FACTUAL ALLEGATIONS**

12 18. YouTube is the largest video-sharing platform in the world and operates under
13 the framework established by the DMCA.

14 19. The DMCA provides a process by which copyright owners may request the
15 removal of infringing content through a notice-and-takedown mechanism. If the platform
16 receives a valid takedown notice, it typically disables access to the allegedly infringing
17 material.

18 20. The statute also gives the alleged infringer a way to respond: a counter-
19 notification claiming the use is authorized, lawful, or otherwise non-infringing. If the
20 copyright owner does not file a federal lawsuit within 10 business days of receiving a
21 counter-notice, YouTube must restore access to the disputed content. 17 U.S.C. § 512(g).

22 21. This framework shifts the burden onto copyright owners, often small creators
23 or publishers, to file suit quickly or see their work reposted.

24 22. Infringers exploit this imbalance, especially anonymous, monetized
25 “reaction” channels, by filing boilerplate counter-notices designed to intimidate rights
26 holders into dropping the matter.

1 23. In practice, this loophole allows such channels to continue monetizing stolen
2 content while hiding behind the mantra of “fair use,” even where their videos consist
3 largely of unaltered footage from original creators.

4 24. Over time, “fair use” has become a catchall excuse on YouTube, not to
5 support legitimate critique or commentary, but to justify wholesale misappropriation and
6 monetization of others’ work without meaningful transformation.

7 25. In the context of this Complaint, the term “Auditor” refers to independent
8 content creators who record interactions with government officials in public spaces to
9 promote transparency, document public conduct, and assert constitutional rights,
10 particularly those protected by the First Amendment. These creators act as citizen
11 journalists, watchdogs, and public advocates, often filming police encounters, public
12 meetings, and other matters of public interest, and then publishing that footage online, most
13 prominently on YouTube.

14 26. The Auditor movement has grown into a visible force on social media,
15 drawing millions of subscribers and billions of views. Many operate under pseudonyms
16 but have become well-known within the digital civil rights space.

17 27. One such Auditor is Plaintiff, an activist and content creator who regularly
18 films interactions with public officials, government employees, and law enforcement
19 officers in the course of his advocacy work. He posts these recordings to the DMA Channel,
20 where they serve both as a record of public conduct and as a tool to promote government
21 transparency and accountability. Plaintiff’s work is part of the broader Auditor movement
22 and has attracted a dedicated audience interested in constitutional rights, public oversight,
23 and civil liberties.

24 28. In response to the popularity of Auditors like Plaintiff, a genre of YouTube
25 creators known as “Auditor Trolls” has emerged.¹ These channels purport to critique
26 Auditor content, but their focus is ridicule rather than substantive analysis. Cloaked in the
27

28 ¹ Auditor-Troll channels frequently refer to Auditors as “Frauditors,” from which Defendants derived the name of their channel, *Frauditor Troll*.

1 trappings of commentary, these videos rely heavily on insult, mockery, and
2 misrepresentation rather than meaningful critique or transformative discussion.

3 29. The Frauditor Troll Channel is a textbook example. It provides no new
4 message, insight, or purpose. Instead, it repackages Plaintiff’s footage with occasional
5 ridicule to attract viewers and generate ad revenue, while creating little original content of
6 its own.

7 30. The additions rarely address the subject matter or journalistic value of the
8 original works. Instead, they mock Auditors personally and divert viewers from the original
9 content.

10 31. The Frauditor Troll Channel has repeatedly used Plaintiff’s copyrighted works
11 without permission while not satisfying fair use standards.

12 32. Based upon information and belief, Defendants obtained the footage used
13 from the DMA Channel in violation of YouTube’s Terms of Service and federal law.

14 **Plaintiff’s Copyrighted Works**

15 33. On or about March 16, 2022, Plaintiff published a video titled *ANOTHER*
16 *CHAD EXPOSED!!! Worthless Denver Cops...ASSAULTED!!!* (“*Another Chad*”), to the
17 DMA Channel².

18 34. Plaintiff registered *Another Chad* with the U.S. Copyright Office under
19 Registration Number PA002457989 on February 6, 2024.

20 35. On or about February 3, 2022, Plaintiff published a video titled *FEDERAL*
21 *COURTHOUSE FAIL!!! Threatened with arrest for recording and not one officer*
22 *identifies!* (“*Courthouse Fail*”) to the DMA Channel.³

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28 ² <https://youtu.be/bhgHsP14Mr0?si=F-7EgMg0bBZiy-QY>.

³ https://www.youtube.com/watch?v=coiMQm_zzFE&t=1s.

1 36. On or about October 1, 2023, Plaintiff published a video titled *ANGRY MOB*
2 *AT BELMAR LIBRARY!!! "CALL 911!" Cops don't show up* to the DMA Channel
3 (*"Belmar Library"*).⁴

4 **Defendants' Infringing Videos**

5 37. On or about December 2, 2022, Defendants published a video titled *Frauditor*
6 *DMA Gets Confronted by Angry Citizen (Hilarious)* ("Infringing Video 1") to the Frauditor
7 Troll Channel.⁵ Infringing Video 1 incorporates approximately twenty-five minutes and
8 fifty-four seconds of Plaintiff's video *Another Chad* without authorization.

9 38. Infringing Video 1 reproduces Plaintiff's footage in fifteen separate blocks
10 with no commentary, twelve of which exceed one minute, three of which exceed two
11 minutes, one exceeds three minutes, and one exceeds four minutes. This repeated use of
12 lengthy, uninterrupted segments underscores the absence of meaningful transformation or
13 interspersed analysis.

14 39. Plaintiff's *Another Chad* video is forty-eight minutes and fourteen seconds in
15 length, meaning Defendants reproduced more than fifty-four percent of Plaintiff's work.
16 Excluding the introductory and concluding segments, eighty-seven percent of Defendants'
17 video consists of Plaintiff's footage presented in long, unaltered blocks. The remaining
18 thirteen percent comprises brief interjections totaling less than four minutes, primarily
19 mocking Plaintiff rather than analyzing the subject matter or providing substantive
20 commentary.

21 40. On or about February 4, 2022, Defendants published a video titled *Frauditors*
22 *Ejected from Federal Courthouse (NEW)* ("Infringing Video 2") to the Frauditor Troll
23
24
25

26 ⁴ <https://www.youtube.com/watch?v=86UKGVikxKQ&t=100s>. Registration of the *Belmar Library* video
27 is currently pending before the U.S. Copyright Office. Plaintiff intends to amend this Complaint to include
28 that registration once it is issued.

⁵ The video was available at the URL <https://www.youtube.com/watch?v=I-J8sdKZ504>. The video was removed after the filing of this action.

1 Channel.⁶ Infringing Video 2 incorporates approximately eighteen minutes and forty-six
2 seconds of Plaintiff's *Courthouse Fail* video without authorization.

3 41. Plaintiff's *Courthouse Fail* video is thirty minutes and twenty-seven seconds
4 long, meaning Defendants misappropriated approximately sixty-two percent of Plaintiff's
5 work. Excluding the brief introduction and outro, eighty-seven percent of Defendants'
6 video consists of Plaintiff's footage, while Defendants' commentary accounts for only
7 thirteen percent, two minutes and forty-eight seconds in total. These brief interjections
8 provide no meaningful analysis or critique and do nothing to alter the expressive core of
9 Plaintiff's work, which dominates the viewing experience.

10 42. On or about October 1, 2023, Defendants published a video titled *Frauditor*
11 *DMA gets Camera Touched and CRIES A RIVER* ("Infringing Video 3") to the Frauditor
12 Troll Channel.⁷ Infringing Video 3 incorporates thirty-seven minutes and sixteen seconds
13 of Plaintiff's *Belmar Library* video without authorization. (Infringing Video 1, Infringing
14 Video 2 and Infringing Video 3 are collectively referred to as the "Infringing Videos").

15 43. Infringing Video 3 reproduces Plaintiff's footage in twelve separate blocks
16 with no commentary. Each block exceeds one minute; eight blocks exceed two minutes;
17 three blocks exceed four minutes; and the longest uninterrupted segment runs over six
18 minutes. This repeated use of extended, uninterrupted sequences underscores the absence
19 of meaningful transformation or interspersed analysis.

20 44. Plaintiff's *Belmar Library* video is forty-six minutes and fourteen seconds in
21 length, meaning Defendants misappropriated approximately eighty-one percent of
22 Plaintiff's work. Excluding the introductory and concluding segments, ninety-two percent
23 of Defendants' video consists of Plaintiff's footage presented in long, uninterrupted blocks.
24 The remaining eight percent consists of brief interjections totaling under three and a half
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27 ⁶ <https://www.youtube.com/watch?v=eVe4eoOzPvc&t=700s>.

28 ⁷ <https://www.youtube.com/watch?v=rSUT6MDdfoo>. The video was removed after the filing of this action.

1 minutes, primarily mocking Plaintiff rather than analyzing the subject matter or providing
2 any meaningful commentary.

3 ***Defendants' Video - How to do Fair Use Properly and Avoid Copyright Strikes***

4 45. On or about May 24, 2022, the Frauditor Troll Channel (or a related channel)
5 posted a video titled *How to do Fair Use Properly and Avoid Copyright Strikes*. The video
6 is narrated by Huneault.

7 46. In that video, Huneault claims to offer a formula for “100% safe fair use
8 commentary videos.” He instructs viewers that a “good amount of commentary is about 40
9 seconds to every minute so you say a little comment every minute that way you’ll be safe.”
10 He also advises creators to pad videos with lengthy intros and outros and to intersperse
11 other clips in order to “increase the proportion of time that is something else than one
12 specific video.” Finally, Huneault says that the goal is to use “less than fifty percent of a
13 specific video” and asserts that when you’re “only using 30% of someone’s video, you are
14 very unlikely to get a copyright strike.”

15 47. Although Plaintiff disagrees with Huneault’s oversimplistic take on fair use,
16 as discussed above, Huneault did not even follow his own purported “fair use” formula
17 when misappropriating Plaintiff’s Videos.

18 ***Plaintiff’s DMCA Takedowns and Defendants’ Abuse of the Counter-Notice System***

19 48. In July and October 2023, Plaintiff submitted twelve DMCA takedown
20 notices to YouTube identifying videos uploaded by Defendants to the Frauditor Troll
21 Channel that infringed Plaintiff’s copyrighted works.

22 49. The results were mixed. Defendants accepted two strikes without filing
23 counter-notices, YouTube declined to remove one video, and Defendants filed the nine
24 Counter-Notices under §512(g)(3) seeking reinstatement of the remaining works.⁸

25 50. Each of the Counter-Notices contained substantially identical boilerplate
26 language and multiple false statements, including that the uploads were protected by “fair
27

28 ⁸ Defendants filed eight counter-notices on or about July 5, 2023 and one counter-notice on or about October 20, 2023.

1 use,” that Huneault was “the original creator of the Fair Use videos on my channel,” and
2 that Defendants had retained legal counsel prepared to litigate the matter. These statements
3 were materially false. The Frauditor Troll Channel is owned and monetized by Ohiri, not
4 Huneault, and no legal counsel had been retained.

5 51. Defendants further misrepresented their location by providing “99 Wall
6 Street, New York, NY” as their service address in each Counter-Notice. In reality, both
7 Defendants reside in Canada. This fictitious U.S. address obstructed Plaintiff’s ability to
8 effect service of process and constitutes an additional knowing misrepresentation.

9 52. Relying on these misrepresentations, YouTube reinstated nine videos. After
10 Plaintiff commenced this action on June 3, 2025, Defendants deleted nine of the ten
11 videos⁹, including eight of the nine that had been reinstated by the Counter-Notices. One
12 infringing video remains live on the Frauditor Troll Channel as of the filing of this
13 Complaint.

14 53. Defendants’ repeated use of false claims, a sham address, and fabricated
15 assertions of ownership and legal representation demonstrate that the Counter-Notices
16 were not merely mistaken but knowingly false and submitted in bad faith.

17 54. On July 5, 2023, the same day Defendants submitted eight Counter-Notices
18 under 17 U.S.C. § 512(g), Huneault emailed Plaintiff, stating: “If I counter every strike and
19 they all get reinstated eventually it could penalize your channel. I’m going to keep making
20 fair use videos, I’m legally allowed to do so.”

21 55. That evening, Huneault emailed again, identifying himself as “Josh,” claiming
22 he had “talked to a lawyer,” demanding \$9,000, and asserting: “You already know the
23 videos will be reinstated in 3 weeks through the counter notification system.”

24 56. These contemporaneous emails confirm Defendants used the counter-notice
25 mechanism as a tactic to force automatic reinstatement, not to correct any mistake or
26 misidentification, and that Huneault deployed a false identity while doing so.

27
28

9 As alleged above, YouTube refused to remove one of the ten videos.

1 64. Defendants’ use of *Another Chad* was for commercial purposes, including
2 monetization through advertisements and promotion of merchandise.

3 65. Defendants’ use of *Another Chad* was not transformative and does not qualify
4 as Fair Use.

5 66. As a result of Defendants’ infringement, Plaintiff has suffered actual damage
6 including lost viewership, lost revenue, and diminution of the market value of *Another*
7 *Chad*.

8 67. Plaintiff is entitled to recover actual damages and Defendants’ profits
9 pursuant to 17 U.S.C. § 504(b).

10 68. Plaintiff is further entitled to injunctive relief and costs pursuant to 17 U.S.C.
11 §§ 502 and 505.

12 **SECOND CAUSE OF ACTION**

13 **Misrepresentation in Counter-Notifications under the DMCA**

14 **(17 U.S.C. § 512(f))**

15 **(All Infringing Videos)**

16 69. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1
17 through 68.

18 70. Section 512(f)(2) of the Copyright Act provides, in relevant part, that “any
19 person who knowingly materially misrepresents under this section . . . that material was
20 removed or disabled by mistake or misidentification, shall be liable for any damages,
21 including costs and attorneys’ fees, incurred by...any copyright owner...who is injured by
22 such misrepresentation...”

23 71. In Counter-Notices submitted to YouTube under penalty of perjury,
24 Defendants represented, among other things, that: (a) the removals were the result of
25 “mistake or misidentification” and the Infringing Videos were protected by “fair use,”
26 citing a nonexistent “fair use act of 1976”; (b) Huneault owned the Frauditor Troll Channel
27 and the videos at issue; (c) Defendants had already hired an attorney and were prepared to
28 litigate; and (d) Defendants could be served at 99 Wall Street, New York, New York.

1 72. Those statements were false, and, critically, were made without a good-faith
2 belief at the time of each Counter-Notice that the videos were noninfringing or the
3 removals were by mistake or misidentification. As alleged above, the Infringing Videos
4 reproduce the bulk of Plaintiff’s works in long, uninterrupted blocks with only token, non-
5 transformative interjections. Moreover, in or about May 2022, Defendants published a
6 video titled *How to Do Fair Use Properly and Avoid Copyright Strikes*, in which Huneault
7 instructed viewers to (a) insert commentary at least every 40 seconds, (b) limit use to less
8 than 50% of another’s work, and (c) pad videos with intros/outros to dilute the proportion
9 of infringing content. Defendants’ Infringing Videos ignored each of those purported
10 safeguards. This objective contradiction between Huneault’s professed “fair use formula”
11 and his conduct demonstrates that he knew the videos were not fair use and nonetheless
12 represented otherwise under penalty of perjury in the Counter-Notices.¹⁰ On July 5–6,
13 2023, Huneault further admitted he filed counter-notices to “penalize” Plaintiff’s channel,
14 expected automatic reinstatement within three weeks, and had not retained counsel.
15 YouTube relied on these misrepresentations to reinstate the removed videos, causing
16 Plaintiff to incur litigation costs and other damages that would not have occurred but for
17 Defendants’ fraudulent Counter-Notices. These contemporaneous admissions show the
18 Counter-Notices were tactical, not truthful.

19 73. The ownership claim was false. Huneault does not own the Frauditor Troll
20 Channel, which is owned and monetized by Ohiri. By claiming to be the owner, Huneault
21 misrepresented facts essential to the statutory process under §512(g)(3) and further
22 demonstrates Defendants’ pattern of knowingly false statements.

23 74. The “already hired an attorney” assertion was false. As alleged above, the day
24 after submitting the July 2023 Counter-Notices Huneault publicly admitted he had not
25 hired a lawyer and would “talk to a paralegal” instead.

26 _____
27 ¹⁰ Plaintiff does not concede that Huneault’s statements regarding fair use are correct; they are reproduced
28 solely to demonstrate that Huneault understood the principles he articulated and that his representations
in the Counter-Notices were knowingly false.

1 75. After being notified of this lawsuit, Defendants took no steps to appear or
2 defend; instead, they engaged in evasive tactics, refusing to accept service of process and
3 mass deleting over 1,700 videos. These facts underscore that Defendants' Counter-Notices
4 were not only legally baseless but knowingly false.

5 76. The New York service address was false and materially misleading. As
6 alleged above, both Defendants reside in Canada; listing "99 Wall Street, New York, NY"
7 impeded service and misrepresented their location.

8 77. As a direct result of Defendants' material misrepresentations, Plaintiff was
9 forced to initiate this action to have the Infringing Videos removed from the Frauditor Troll
10 Channel. Plaintiff is entitled to recover damages, costs, and attorneys' fees under 17 U.S.C.
11 § 512(f).

12 78. Plaintiff is further entitled to injunctive relief requiring YouTube or its agents
13 to remove the Infringing Videos from the Frauditor Troll Channel and to prevent their re-
14 upload.

15 **THIRD CAUSE OF ACTION**

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

17 **(All Infringing Videos)**

18 79. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1
19 through 78.

20 80. An actual and justiciable controversy exists concerning Defendants' repeated
21 assertions of fair use in connection with the Infringing Videos uploaded to the Frauditor
22 Troll Channel. Plaintiff issued valid DMCA takedown notices for these videos, and
23 Defendants responded by submitting the Counter-Notices under 17 U.S.C. § 512(g)(3),
24 each claiming that the removed material was lawful and protected by fair use.

25 81. Three of these videos, *Another Chad*, *Courthouse Fail*, and *Belmar Library*,
26 are specifically identified and described in this Complaint. Plaintiff seeks a judicial
27 declaration that Defendants' use of these works does not qualify as fair use and, as to
28 *Another Chad*, constitutes copyright infringement under 17 U.S.C. § 501.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

- A. That judgment be entered in favor of Plaintiff and against Defendants for monetary damages caused by their infringement of Plaintiff's *Another Chad* copyright;
- B. That judgment be entered in favor of Plaintiff and against Defendants for monetary damages caused by their knowing material misrepresentations in the Counter-Notices pursuant to 17 U.S.C. § 512(f);
- C. The Court enter a declaratory judgment that Defendants' use of *Another Chad* constitutes copyright infringement and is not protected by 17 U.S.C. § 107;
- D. The Court enter a declaratory judgment that Defendants' use of *Courthouse Fail* and *Belmar Library* are not protected by 17 U.S.C. § 107;
- E. A permanent injunction enjoining Defendants from further use of *Another Chad*, *Courthouse Fail* and *Belmar Library* and requiring YouTube and any third-party platforms under Defendants' control to remove the Infringing Videos and prevent further dissemination;
- F. An award of attorneys' fees and costs pursuant to 17 U.S.C. § 512(f);
- G. Any other relief the Court deems just and proper.

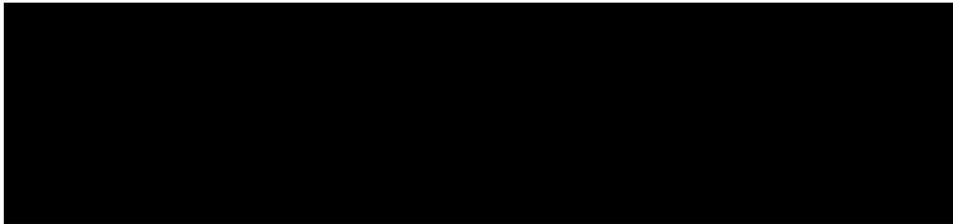
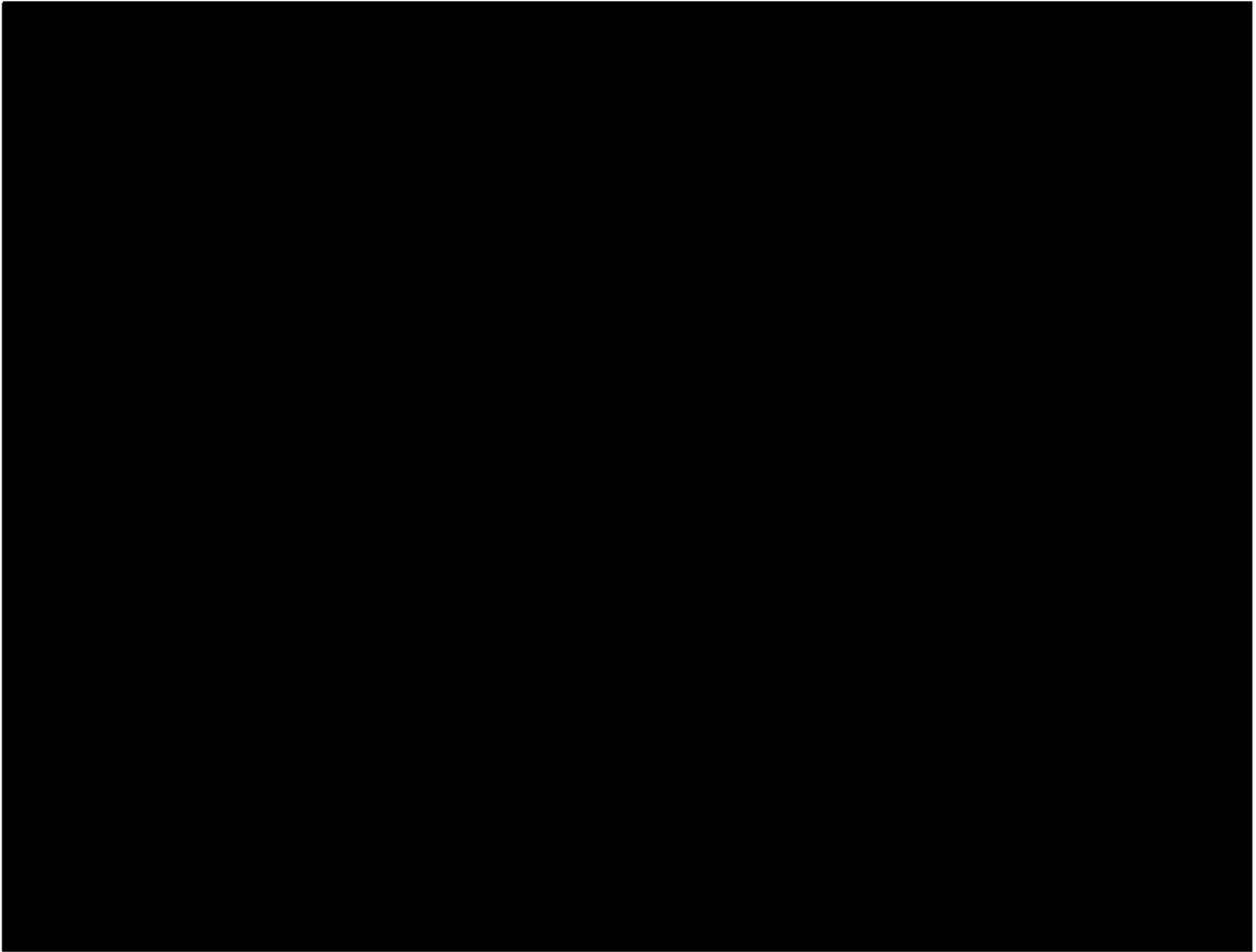
JURY TRIAL DEMANDED

1 Dated: August 30, 2025

2 /s/ Randall S. Newman
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On Fri, Oct 20, 2023 at 9:20 PM YouTube Copyright <youtube-disputes+047q3u38adjku0h@google.com> wrote:



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.

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=rSUT6MDdfoo>

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

(917) 261-3199

[Help Center](#) • [Email Options](#)

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



On Thu, Jul 6, 2023 at 11:28 AM YouTube Copyright <youtube-disputes+0jq18tb4p50pb0h@google.com> wrote:



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.

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.

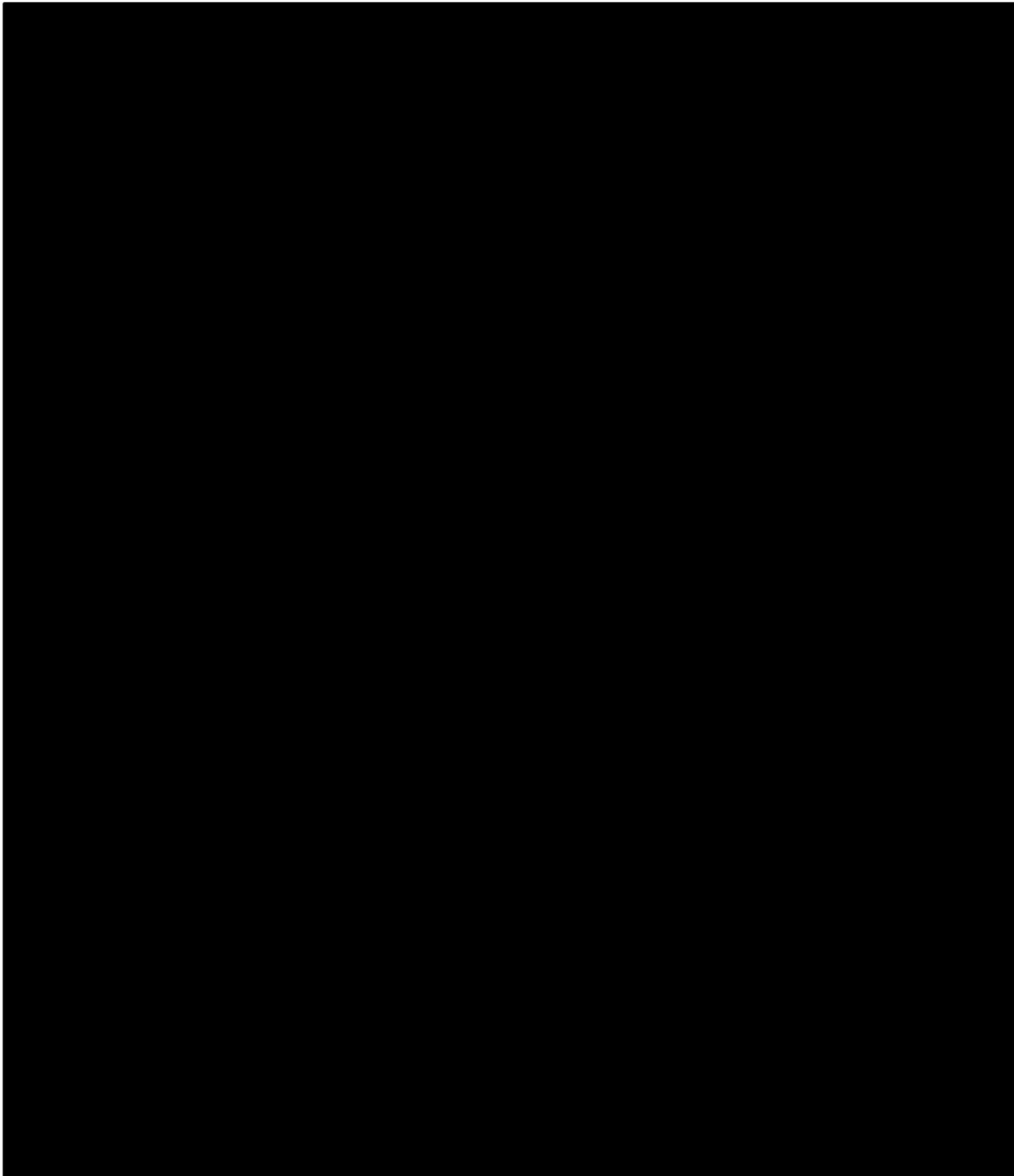
Jonathan Huneault

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99 Wall Street
NY, 10005
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(917) 261-3199

[Help Center](#) • [Email Options](#)



On Thu, Jul 6, 2023 at 8:05 PM YouTube Copyright <youtube-disputes+3t5nx1ze1x1mv0h@google.com> wrote:



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.

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=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

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.

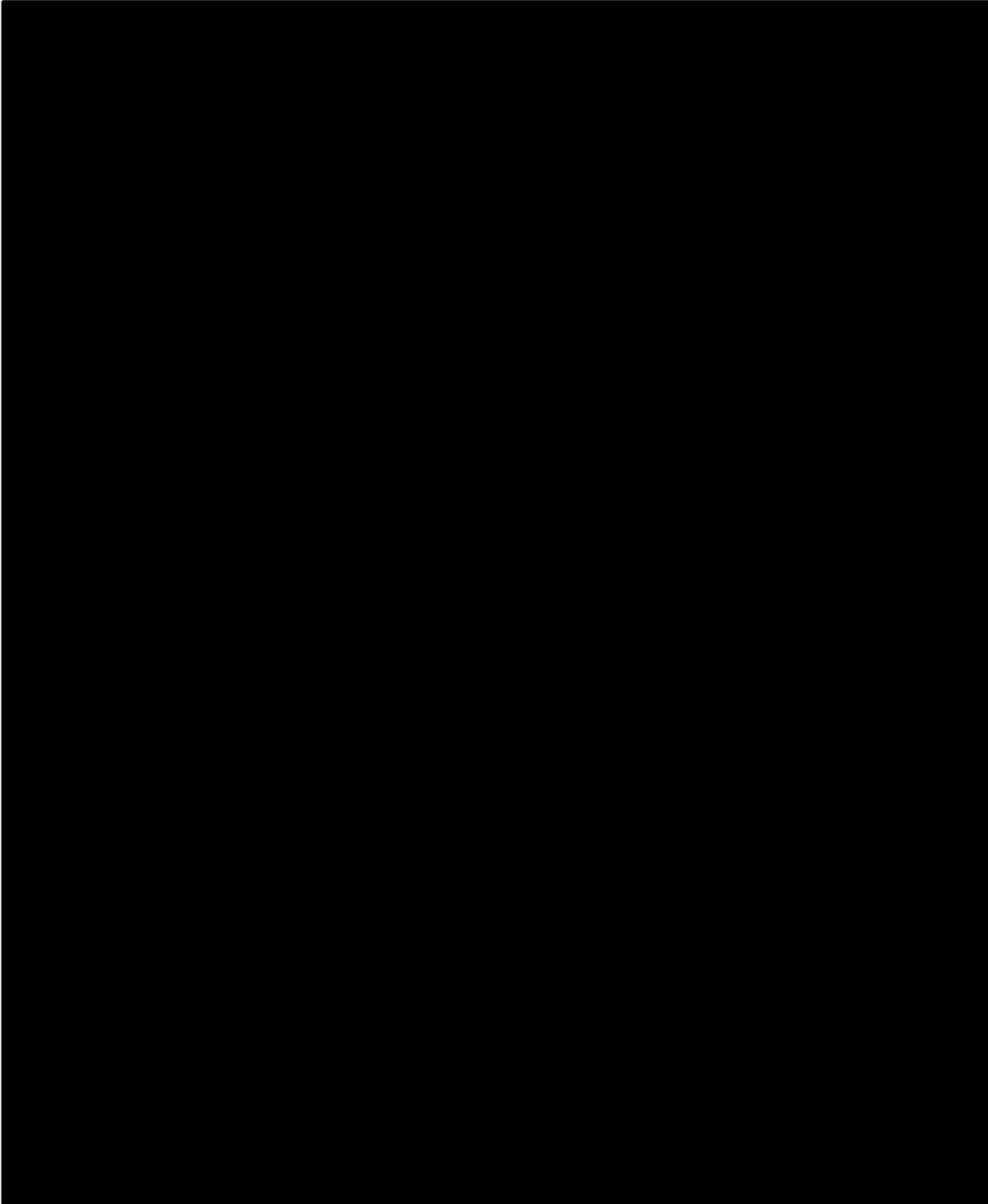
I consent to the jurisdiction of the Federal District Court for the district in which my address is located, or if my address is outside of the United States, the judicial district in which YouTube is located, and will accept service of process from the claimant.

Jonathan Huneault

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

frauditortroll@gmail.com

(917) 261-3199



On Thu, Jul 6, 2023 at 1:33 PM YouTube Copyright <youtube-disputes+0vnt6in1mychu0h@google.com> wrote:



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.

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=WO4jjYFpSsQ>

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

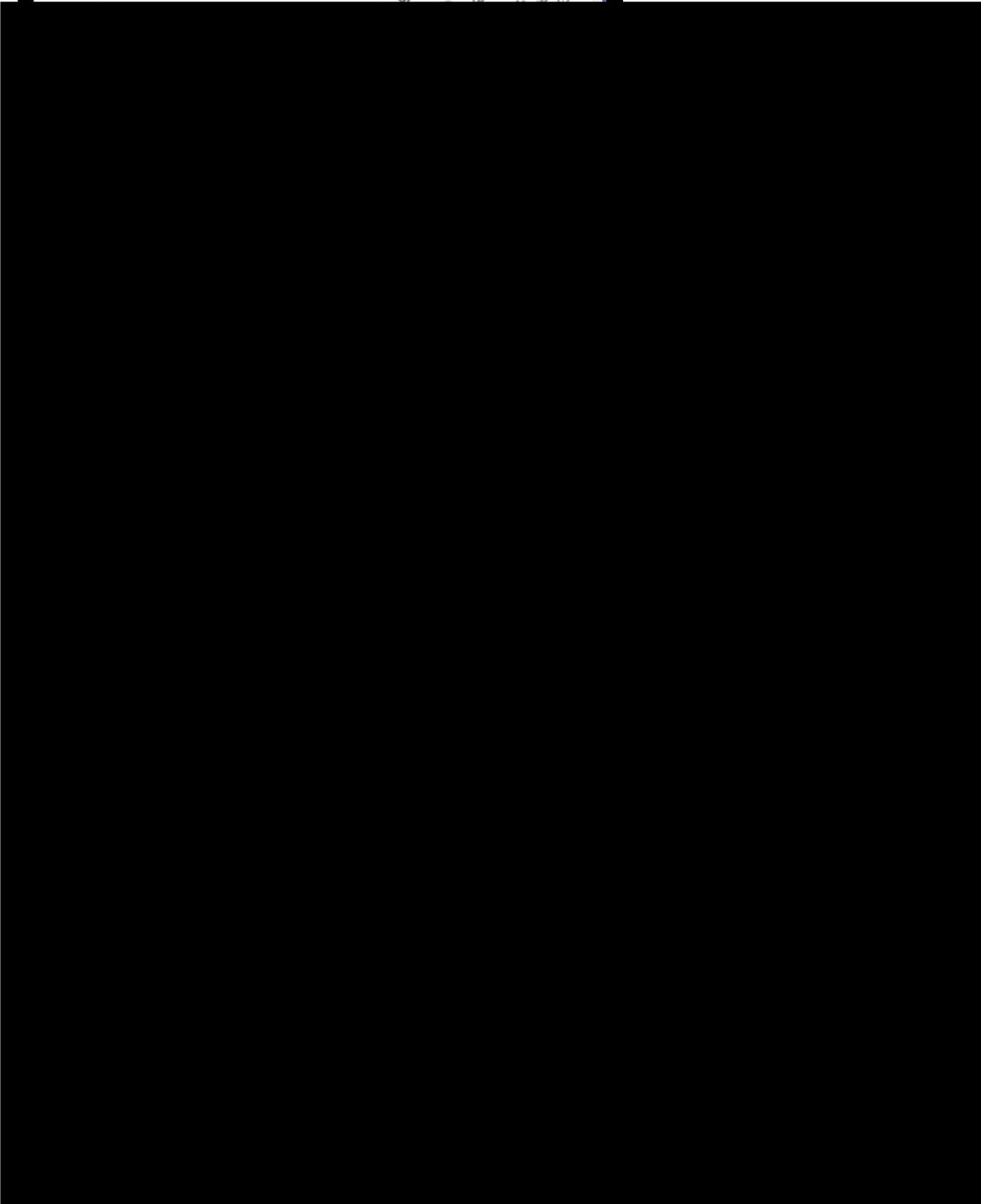
Jonathan Huneault
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(917) 261-3199

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On Thu, Jul 6, 2023 at 1:32 PM YouTube Copyright <youtube-disputes+2ivhuzn79bjmg0h@google.com> wrote:



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.

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=7_YB9S2iySk

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

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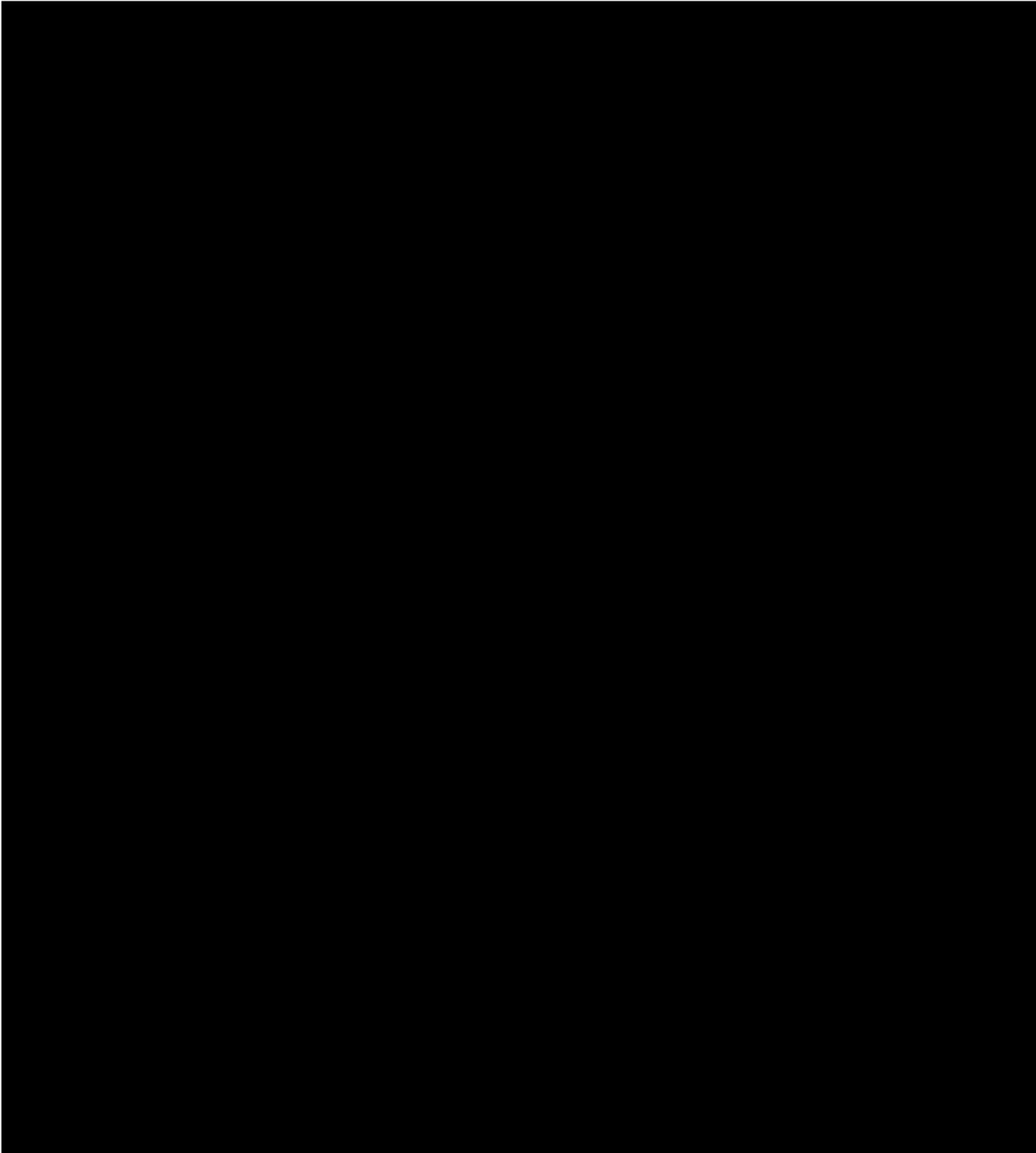
Jonathan Huneault

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[99 Wall Street](#)
[New York, NY 10005](#)
[United States](#)

frauditortroll@gmail.com

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[Help Center](#) • [Email Options](#)



On Thu, Jul 6, 2023 at 1:32 PM YouTube Copyright <youtube-disputes+0r1jzkrc3cc5w0h@google.com> wrote:



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=_xAB_dhJSr8

Display name of uploader: Frauditor Troll

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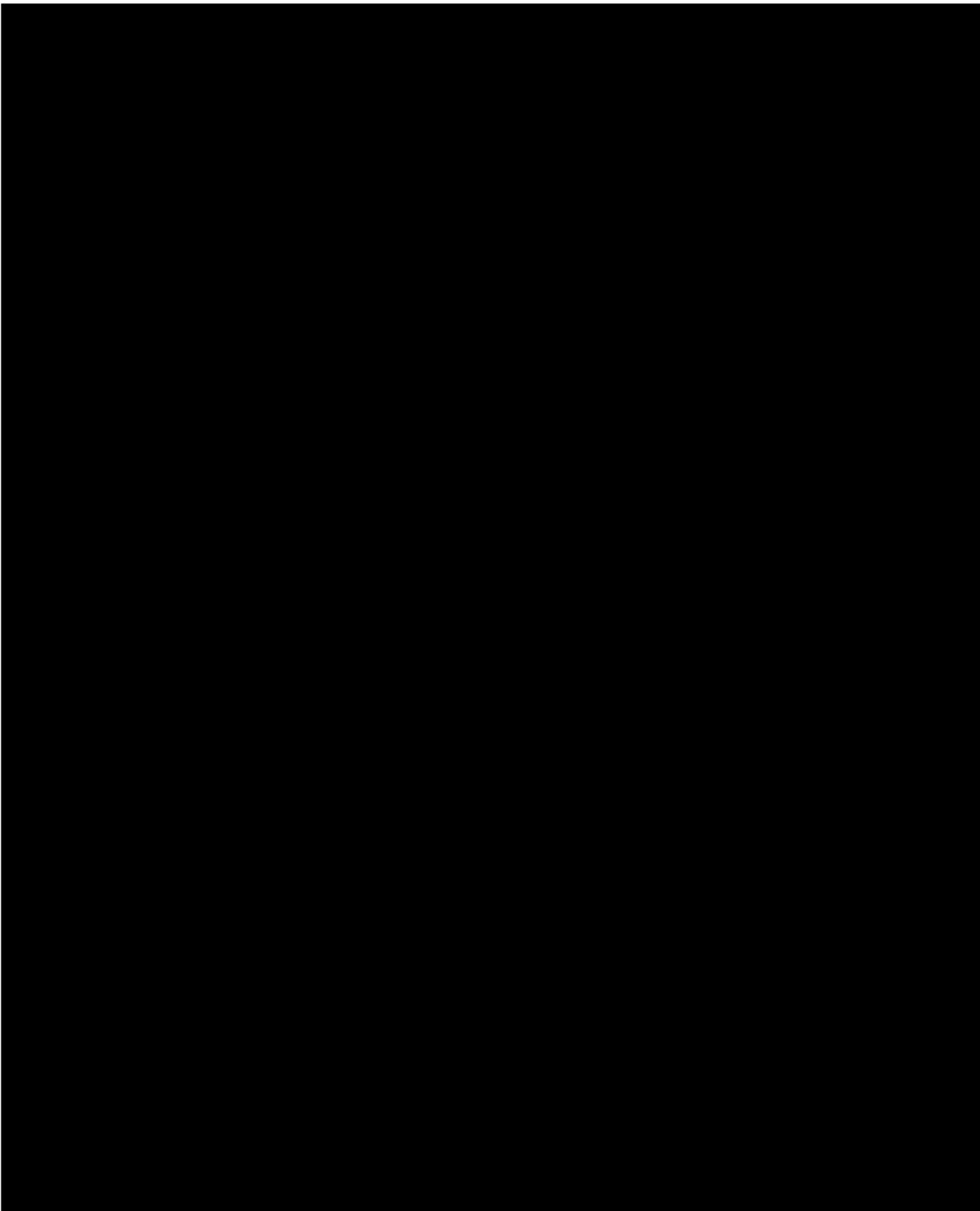
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[Help Center](#) • [Email Options](#)



On Thu, Jul 6, 2023 at 1:32 PM YouTube Copyright <youtube-disputes+3l6lsz5fln03u0h@google.com> wrote:



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=4OK8icQxroQ>

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

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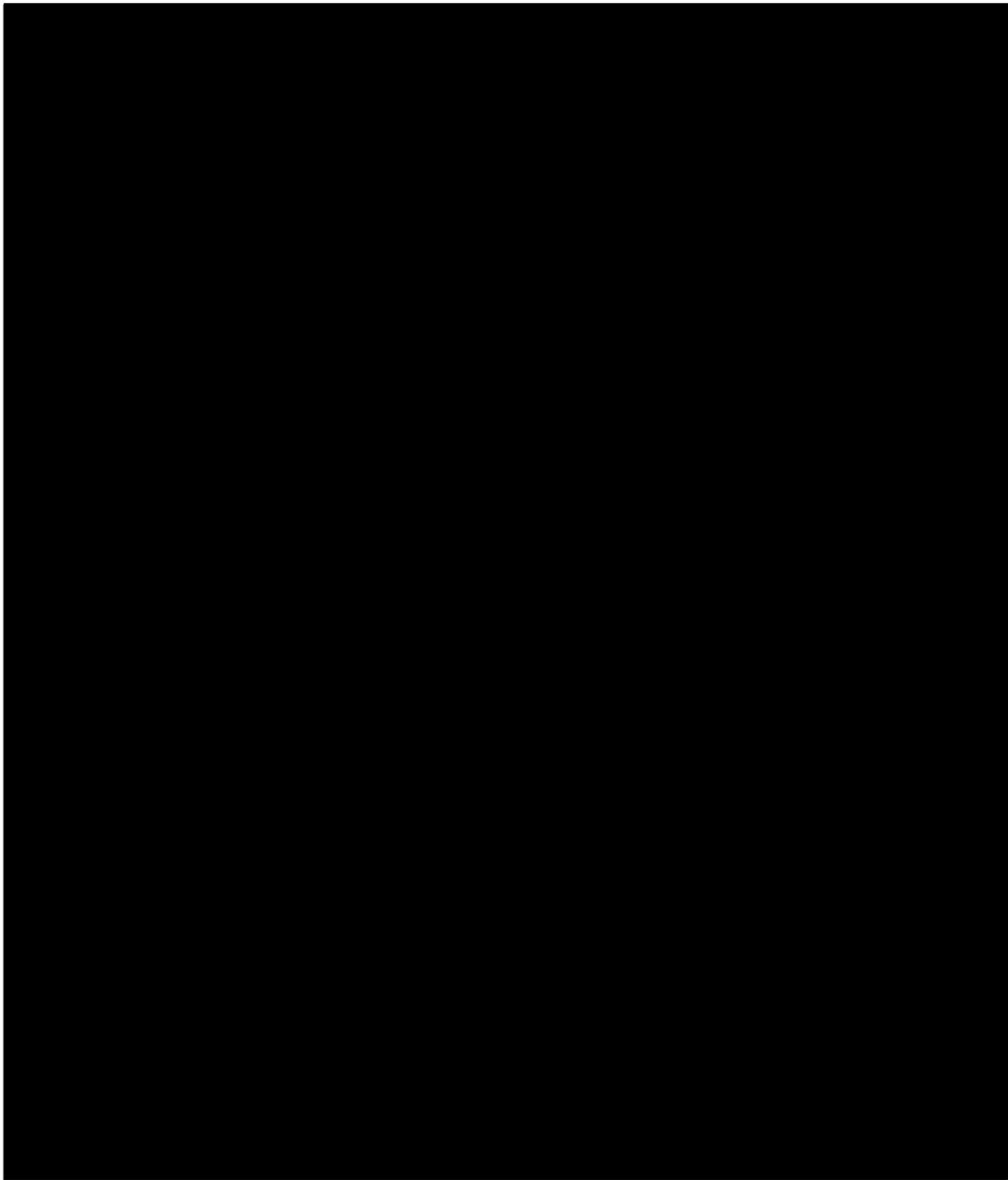
Jonathan Huneault

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On Thu, Jul 6, 2023 at 1:31 PM YouTube Copyright <youtube-disputes+2w9ywc8xzq7mh0h@google.com> wrote:



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.

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=xcFmoMTsdFs>

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

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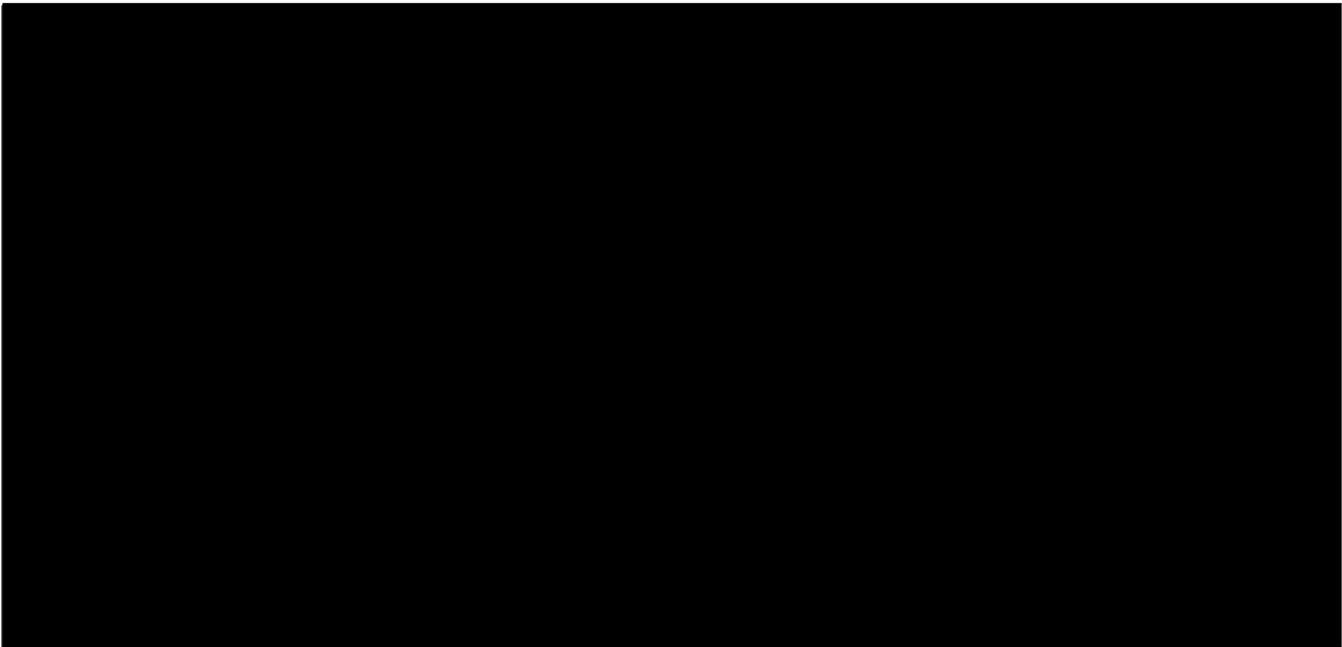
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On Thu, Jul 6, 2023 at 1:32 PM YouTube Copyright <youtube-disputes+1gwmmqunnzkjh0h@google.com> wrote:



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.

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- The YouTube Team

Counter Notification as follows:

Videos included in counter notification:

- http://www.youtube.com/watch?v=t_aTbIYntZA

Display name of uploader: Frauditor Troll

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