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8 A/K/A "FRAUDITOR TROLL"

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

13 CHRISTOPHER J CORDOVA

14 Plaintiff,

15 vs.

16 JONATHAN HUNEALT A/K/A
17 "FRAUDITOR TROLL"

18 Defendant.

No. 5:25-cv-04685-VKD

Honorable Judge: Virginia K.
DeMarchi

**DECLARATION OF JONATHAN
HUNEALT IN SUPPORT OF
MOTION TO DISMISS**

HEARING

Date: November 18, 2025

Time: 10:00

Place: 280 South 1st Street,
Courtroom: 2 (5th Floor), San Jose, CA
95113.

*[Filed concurrently with proposed
order, and memorandum of points and
authorities]*

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24 **DECLARATION**

25
26 I, Jonathan Huneault hereby declare as follows:
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- 1 1. I have personal knowledge of the following, and if called to testify, I would
2 competently testify as follows:
3
- 4 2. I am the owner of the *Frauditor Troll* YouTube channel and the defendant in
5 this action.
- 6 3. My channel is a parody website that pokes fun at Auditors who consume
7 public resources in an attempt to build content for their YouTube channels.
8
- 9 4. My videos are carefully edited with memes, sound effects, commentary and
10 altered Audio as well as original music.
- 11
- 12 5. The video at issue in this case has a total of 33 audio or visual transformations
13 on top of the cuts to trim down the length of the video.
- 14
- 15 6. The original video was over 48 minutes long and I cut it down to 30 minutes,
16 which includes my numerous transformations.
- 17
- 18 7. I only took the parts that were relevant to my audience and nothing more. The
19 confrontation between the citizen and the auditor in this video was very
20 lengthy but with my cuts and 33 audio and visual transformations the video
21 has been transformed into something else entirely. A parody of Plaintiff's
22 work.
23
- 24 8. Instead of being an informational video depicting an interaction between a first
25 amendment auditor and the police (which targets a pro-auditor anti-police
26 audience) while my channel advances a pro-police anti-auditor audience (a
27 different audience).
28

1 9. Here is a factual overview of the efforts made to transform the video at issue
2 into a new work (Step One of the four fair use factors):
3

4 10. Here is a link to the videos at issue:

5 Defendant video: <https://youtu.be/I8VDpVDN-T4>

6 Plaintiff video: https://youtu.be/bhgHsPl4Mr0?si=03VZ2Hqr_pu1DDzQ
7

8 **TRANSFORMATION ELEMENTS**

9
10 **1- 0:00** - introduction of the video, the first part is missing because of the
11 wayback machine but plaintiff should have the missing part.

12 **2- 0:56** - Meme of Tom cruise laughing to illustrate how ridiculous the
13 situation is.
14

15 **3- Commentary** - snarky commentary about how plaintiff is covering for the
16 suspects.
17

18 **4- 2:39** - Star wars meme to show how the plaintiff's behavior is stupidity that
19 has not been seen in a long time

20 **5- Commentary** - discussion about the law and how stricter laws will be
21 enacted because of people like this (For example, the Florida Halo law). The
22 Florida Halo Law requires individuals to stay 25 feet away from first responders
23 when asked, protecting law enforcement, firefighters, and emergency medical
24 personnel. The law's purpose is to prevent interference, harassment, and safety risks.
25
26

27 **6- 4:04** - Meme of a comedian asking if he is *seriously that stupid?*
28

1 **7- Commentary** - I comment and critique him wasting resources.

2 **8- 6:05** – A character added to the video that I designed myself.

3
4 **9- Commentary** - I am approving the job of the officer and hype up the viewer
5 by saying *action is about to happen*.

6 **10- 6:55** – A SpongeBob meme is added to show the passage of time

7
8 **11- 7:30** - Audio manipulation created in power director to make the plaintiff
9 sound like a chipmunk for parody purposes.

10 **12- 7:33** – Added Meme of frauditors depicting them as babies dressed as
11 police officers. Additional Commentary - I criticize the plaintiff for calling every
12 single officer a tyrant.

13
14 **13- 8:16** - Meme of Michael Jordan laughing.

15
16 **14- Commentary** - I criticize the plaintiff for making assumptions about why
17 the police arrested the suspect, he had no idea what he was talking about and the
18 officer clarified that the suspect had a warrant.

19
20 **15- 9:46** – Added Star trek meme referencing DMA (Denver Metro Audits) as
21 being an *Asshole*.

22 **16- Commentary** - I comment on and criticize the Plaintiff's hypocrisy as he
23 is making assumptions that the police officer is a wife beater.

24
25 **17- 10:43** - Meme of a crazy person playing with a rock. Commentary - I
26 give my opinion that the individual that is confronting the plaintiff is unhinged but
27

28

1 that the plaintiff is scared and I hype up the viewers by saying that things are about
2 to get hilarious.

3
4 **18- 13:35** - Video clip meme of men reacting to brutal roasting to show that
5 the plaintiff has been thoroughly roasted.

6
7 **19- 13:42** - Image of my avatar in a post office that I have created myself
8 and added to the video.

9 **20- Commentary** - I criticized the plaintiff calling him a hypocrite for
10 claiming that officers are not in charge of his safety, but yet in this video he is
11 demanding the officer protect him.
12

13 **21- 15:23** - Video clip of a news anchorman laughing uncontrollably to show
14 how ridiculous the situation is adding to the parody.
15

16 **22-** I narrate the video and tell my viewers how I almost fell out of my chair
17 laughing and I point out the hypocrisy of plaintiff asking for help as it goes against
18 everything he has said on his channel.
19

20 **23- 17:32** - Added a Meme from the show “House” showing approval of
21 the officers behavior as illustration.

22 **24- Commentary** - I add factual narration and tell my audience that district
23 6 of the Denver metro police department does not play with frauditors and that
24 District 4 and 5 should takes notes.
25

26 **25- 18:40** - Added Meme of Steve Carell talking gibberish in a movie to
27 criticize the plaintiff about how he is not making sense.
28

1 **26- 20:00** – Added Meme of British YouTuber explaining that if you don't
2 want people to harass you maybe you should not harass them first.

3
4 **27- Commentary** - I provide further narration explaining that police officers
5 would help him if a fight started and point out the hypocrisy that he says that he is in
6 charge of his own safety but then cries to the police when confronted.

7
8 **28- 23:35** – Added Meme of a Baby crying and asking for a name,
9 frauditors are always asking for names and badge numbers of the officers, and that
10 is why I chose to include this meme

11
12 **29- Commentary** - I mock the plaintiff as he is painting himself as a victim.
13 I also add commentary that he doesn't stay here he could leave.

14 **30- 27:52** – I selected and inserted a different meme of a baby crying.

15
16 **31-Commentary** I hype up the viewers by saying that the plaintiff is about to
17 cry another river, commenting on his activities.

18 **32- 30:01** - I thank my members who are contributing to the channel with an
19 image added.

20
21 **33-** I create and add the outro which declares this video the most hilarious
22 situation between the plaintiff and a citizen that I have ever seen.

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24 **31- 30:05** - I play my outro jingle that has been created from scratch in 2022
25 with my Audio production software FL Studio and my video editing software Power
26 Director

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11. Market harm (the fourth fair use factor): The Auditor community and the anti Frauditor community are two distinct audiences and markets. Luckily we have factual and undeniable data from YouTube studio which provides analytics. See **Exhibit “A”** to this declaration which is a true and correct printout from my website which shows what other channels my viewers visit. Notice a lack of Plaintiff’s channel.

12. YouTube studio has a section in the audience category that is called “*Channels your audience watches:*” See **Exhibit “A”** to this declaration which is a true and correct printout from my website which shows what other channels my viewers visit. Notice a lack of Plaintiff’s channel.

13. In that section it will list the 15 channels that your audience watches the most.

14. The 15 channels that my audience watches the most and their genre are:

- 1st Amendment Shenanigans (Anti-Frauditor)
- Van Balion (Bodycam Reaction Channel)
- Dr Dave Frauditor Terminator (Anti-Frauditor)
- The John Ligato Show (Anti-Frauditor)
- BlackHart Knight (Anti-Frauditor)
- Lucid’s Lair (Anti-Frauditor)
- Kfarr Reacts (Anti-Frauditor & Bodycam React)

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- NCR News Network (Anti-Frauditor)
- Frauditor Sheriff Badge 314 (Anti-Frauditor)
- Ragical the Unhallowed Knight (Bodycam React)
- Old Squishy Gardener (Courtoom Cam React)
- Lord Pelie (Anti-Frauditor)
- Law Talk With Mike (Lawyer Channel)
- Spice and Gfaz Show (Anti-Frauditor)
- Dr. Dave Debunker of Frauditor (Anti-Frauditor)

15.The evidence is clear, my audience does not watch Auditors on their channels because they are not interested in that type of content.

16. To provide additional factual data, I posted 2 polls on my community post on my YouTube channel which allows content creators to add a poll for their viewers to respond to. (See attached **Exhibit “B”** for a true and correct copy of the poll conducted on my website).

17. These polls are impartial tools for data gathering, the votes are automatically tabulated by YouTube and I did not inform my viewers ahead of time that these polls would be of any significance so they would answer truthfully.

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18. The first poll is publicly viewable here:
https://www.youtube.com/post/UgkxyvpduKmX4pqBjRU5_VkGrd2ITV5_bMwDO.

19. The question asked in the poll was: Why do you watch my videos? The answers were varied:

- I watch your videos to see you roast frauditors (22%)
- To see you expose the frauditor’s lies and criminal behavior (63%)
- I watch your videos so I don’t have to watch the Frauditor’s video (9%)
- Other reason (explain in comments) 6%

20. These are the results at the time of taking the screenshots on October 10th at 5pm. The percentages will change over time but statistically would be expected to stay in the same ballpark.

21. This poll clearly showed that the vast majority of my viewers watch my channel to see me roast Frauditors and to expose the criminality of such individuals.

22. I gathered more factual data by posting a second poll, available here:
<https://www.youtube.com/post/UgkxqUzsiFcnNz-4YidZyjTHiBNOeKCEd9RA> this time I asked the question: *If the videos exposing frauditors by the anti-frauditor community were not an option, would you watch the frauditors channel?*” (See **Exhibit “C”** to this

1 declaration which is a true and correct copy of the results of the poll).

2 Here were the responses.

- 3
- 4 • No, I would never watch them. 90%
 - 5 • Yes, I would watch them. 10%

6 23. This poll proves that without my channel they would never watch an
7 auditor's channel because as the comment section says they find them
8 repulsive.

9

10 24. The anti-frauditor and auditor genre are polar opposites much like political
11 parties viewers would not typically watch the other by and large. A die-
12 hard republican would not watch CNN and a die-hard democrat would
13 never watch FOX News. The polls are conclusive that there is no market
14 overlay.

15

16 25. The plaintiff's only video that is registered did not suffer any view loss
17 because of my parody video. It was published on March 16th 2022 and by
18 October 2022 it flatlined at 45,313 views over the next 3 months it would
19 garner only an extra 1201 views bringing it to a total of 46,514 views (See
20 **Exhibit "D"** to this declaration which is a true and correct copy of these
21 factual statistics).

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23 26. I posted my video in December of 2022 and the plaintiff's video
24 continued to garner view at a similar rate and finished at 66,623 views to

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this date. It garnered 20,109 views since I posted my video which is a rate of 628 views/month over 32 months.

27. My parody video did not negatively affect the plaintiff’s original video, if anything, his video actually performed better with my video on the platform than without.

28. I did not misrepresent anything in submitting my counternotice to their takedown. I claimed fair use which I clearly believe to be the case.

29. The plaintiff is alleging that I lied about who owns the Frauditor troll channel. That is untrue, the Frauditor Troll channel is owned and monetized by my corporation that was created on 2023-01-19 the name of the corporation is: 14693663 Canada Inc. (See **Exhibit “E”** to this declaration which is a true and correct copy my corporation information).

30. Any and all revenue that is generated by the Frauditor Troll channel goes into a business account that is owned by my corporation.

31. On the counter notification form provided by YouTube it specifically says that you must use your legal name and not your business name and that is why I put my name (Jonathan Huneault) in the form.

32. I am one of the owners of the corporation and therefore I am authorized to sign a counter notification form on behalf of the corporation.

33. The plaintiff is alleging that I used a fictitious address in New York in my counter notification form. The reason why I used a mail forwarding

1 address is because the plaintiff is known for maliciously *doxing*
2 individuals he does not like.

3
4 34. In the past he has doxed a bounty hunter's phone number and a citizen's
5 full address (See **Exhibit "F"** to this declaration which is a true and
6 correct copy of this dangerous doxing done by Plaintiff).

7
8 35. For that reason I used a mail forwarding service located at 99 wall street.
9 (See **Exhibit "G"** to this declaration which is a true and correct copy of
10 the forwarding address).

11
12 36. In August of 2023, I received mail from an individual even though that
13 individual was not provided a suite number. A suite number was not
14 necessary for receiving mail at this address, the only reason why the
15 plaintiff was not able to serve me at this address is because he waited
16 nearly 2 and half years to file a claim.

17
18 37. I discontinued the mail forwarding service in early 2025 and that is the
19 only reason why he was not able to serve me paperwork at that address.
20 Nowhere in the counter notification form does it say I need to maintain
21 that address in perpetuity.

22
23
24 38. The plaintiff is alleging that I am using *boilerplate* responses in my
25 counter notification, that is false. I claimed fair use, plain and simple.

26
27 39. The YouTube system is flawed, unfortunately, because once a video has
28 been taken down by a DMCA takedown the defendant no longer has

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access to the video. So it is impossible to give a detailed analysis with timestamps as there is no way to view the video. Especially in this case where the plaintiff waited months after discovering the video to file the DMCA takedown, the original file was long gone from my hard drive.

40. So I detailed how I transform the video from memory which is by adding memes, commentary and sound effects all of which is true.

41. The plaintiff claims that I lied in the counter notification about retaining an attorney. That is not true, in 2023 I consulted with a Canadian copyright attorney, and they advised me about copyright law. I do not recall the name of the firm as it has been several years but regardless they advised me that I should hire an attorney based in California if I was ever sued which is exactly what I did with this case.

I declare under penalty of perjury under the Laws of the United States of America that the foregoing is true and accurate.

Executed this 13th day of October 2025.

Jonathan Hudon-Huneault

Jonathan Huneault, Declarant

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PROOF OF SERVICE

I declare as follows:

I am employed with The Law Offices of Steven C. Vondran P.C., whose address is *620 Newport Center Drive, Suite 1100, Newport Beach, CA 92660*. I am over the age of eighteen years and am not a party to this action.

On October 13, 2025, I served the foregoing document described as follows:

DEFENDANTS DECLARATION IN SUPPORT OF MOTION TO DISMISS, PROPOSED ORDER, NOTICE OF MOTION AND MOTION TO DISMISS

on the interested parties in this action by:

 U.S. MAIL: I placed a copy in a separate envelope, with postage fully prepaid, for each address named below or on the attached service list for collection and mailing on the below indicated day following the ordinary business practices at The Law Offices of Steven C. Vondran. I certify I am familiar with the ordinary business practices of my place of employment with regard to collection for mailing with the United States Postal Service. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit or mailing affidavit.

 OVERNIGHT MAIL: I sent a copy of the attached document via overnight mail to the address set forth below.

 HAND DELIVERY: I placed a copy in a separate envelope addressed to each addressee as indicated below and delivered it to _____ for personal service.

 FACSIMILE: I sent a copy via facsimile transmission to the fax number(s) indicated below. The facsimile machine I used complied with California Rules of Court, Rule 2003 and no error was reported by the machine. Pursuant to California Rules of Court, Rule 2006(d), I caused the machine to print a transmission record of the transmission, a copy of which is attached to this declaration.

 X **EMAIL:** I sent a copy of the above referenced document by email to the following:

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SERVICE LIST

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xx **ELECTRONIC FILING:** I filed the above described document(s) electronically through the Court’s ECF filing system to all registered users.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on October 13, 2025, Flagstaff, Arizona

/s/ Lisa Vondran
Lisa Vondran, legal assistant

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