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9 *Attorneys for Plaintiff,*  
10 *Consumer Opinion LLC*

11 **IN THE UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN JOSE DIVISION**

14 CONSUMER OPINION LLC,  
15 a Nevada limited liability company,

16 Plaintiff,

17 vs.

18 FRANKFORT NEWS CORP,  
19 an entity of unknown origin;  
20 FRANKFORT HERALD NEWS CORP,  
21 an entity of unknown origin;  
22 HEARST MEDIA LLC,  
23 an entity of unknown origin;  
24 HEART BROADCASTING NETWORKS,  
25 an entity of unknown origin;  
26 HEARST BROADCASTING NETWORKS,  
an entity of unknown origin;  
PALASTINETODAY MEDIACAST LLC,  
an entity of unknown origin;  
MITCHELL SHOOK, an individual;  
ALAUDDIN AHMED, an individual;

*(continued on following page)*

Case No.

**COMPLAINT FOR:**

- (1) VIOLATION OF 17 U.S.C. § 512(f);**
- (2) UNLAWFUL, UNFAIR, AND FRAUDULENT BUSINESS PRACTICE UNDER CALIFORNIA BUSINESS AND PROFESSIONS CODE § 17200;**
- (3) CIVIL CONSPIRACY; and**
- (4) ABUSE OF PROCESS**

**DEMAND FOR JURY TRIAL**

1 MUHAMMAD ASHRAF; an individual;  
2 JUUSO HAGGMAN, an individual;  
3 SHEENA WILLIAM, an individual;  
4 JOSHUA FITZGNER, an individual;  
5 JOHN MATHEW, an individual;  
6 PHILLIP CANNELLA, an individual;  
7 BRAD KUSKIN, an individual;  
8 MARVELLANE FARMS LTD.,  
9 a Canadian entity;  
10 WAGNER TRUCKING INC,  
11 a Minnesota entity;  
12 JOHN DOES 1-10; and  
13 ROE CORPORATIONS 11-20,

Defendants.

11 Plaintiff CONSUMER OPINION LLC ("Opinion") hereby files this complaint  
12 against Defendants FRANKFORT NEWS CORP. ("Frankfort"), FRANKFORT HERALD  
13 NEWS CORP ("Frankfort Herald"), HEARST MEDIA LLC ("Hearst"), HEART  
14 BROADCASTING NETWORKS ("Heart"), HEARST BROADCASTING NETWORKS  
15 ("Hearst"), PALASTINETODAY MEDIACAST LLC, MITCHELL SHOOK, ALAUDDIN  
16 AHMED, MUHAMMAD ASHRAF, JOSHUA FITZGNER, JUUSO HAGGMAN, SHEENA  
17 WILLIAM, JOHN MATHEW, PHILLIP CANNELLA, BRAD KUSKIN, MARVELLANE  
18 FARMS LTD., WAGNER TRUCKING INC., John Does 1-10, and Roe Corporations 11-  
19 20, for violation of 17 U.S.C. § 512(f); unlawful, unfair, and fraudulent business  
20 practices under California Business and Professions Code § 17200; civil  
21 conspiracy; and abuse of process.

22 ///

23 ///

1 **1.0 INTRODUCTION**

2 1. Defendants are participants in a fraudulent “reputation  
3 management” scheme by which they remove content critical of individuals or  
4 businesses by systematically abusing the Digital Millennium Copyright Act’s  
5 (“DMCA”) notice and takedown procedure.

6 2. The details of the scheme are ignoble but ingenious. It starts with an  
7 entity or professional who has received negative reviews in online forums, such  
8 as the web site <pissedconsumer.com>.<sup>1</sup> These reviews are devoid of  
9 actionable content and contain the opinions of aggrieved customers.

10 3. The subject of the negative review then approaches a “reputation  
11 management” company with the desire either to remove the offending content  
12 altogether, or to have it de-listed from search engines such as Google.

13 4. The reputation management company, knowing that preliminary  
14 injunctions are almost never permitted in defamation and related cases, abuses  
15 the DMCA for the purpose of removing or de-listing this content.

16 5. As an integral part of this scheme, the “reputation management”  
17 company creates a web site that purports to be a “news” site, which is designed  
18 to look legitimate at a glance, but any degree of scrutiny reveals it as the  
19 charade it is.

20 6. The company then copies the text of the offending review on the  
21 consumer review web site and places a copy of it on the fake “news” web site,  
22 attributing it to a separate author and attempting to pass it off as a “news”  
23 article. This article is given a false publication date on the “news” web site that  
24 pre-dates the original publication of this content on the consumer review web  
25 site.

26 \_\_\_\_\_  
<sup>1</sup> Owned and operated by Plaintiff Consumer Opinion LLC.



1 corporation, was the recipient of these DMCA notices and acted upon them in  
2 this State. Defendants knew or should have known that Google Inc., the central  
3 (yet unwitting) actor in this scheme, is located in this State. Defendants further  
4 knew that by transmitting these DMCA notices to this district, they would be  
5 causing censorship in this district, and that the actions they caused to be taken  
6 would occur in this district.

7 13. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b)(2)  
8 & (c)(2). Venue lies in the unofficial Southern Division of this Court.

9 **3.0. INTRADISTRICT ASSIGNMENT**

10 14. This action arose in Santa Clara County in that Defendants  
11 submitted the fraudulent DMCA notices to Google Inc., located in Santa Clara  
12 County. Accordingly, pursuant to Local Rules of Court 3-2(c) and (d), the Clerk  
13 shall assign the action to the San Jose division.

14 **4.0. THE PARTIES**

15 15. Plaintiff Consumer Opinion LLC is a Nevada limited liability  
16 company, and is the owner and operator of the consumer review web site  
17 <pissedconsumer.com>.

18 16. There are three groups of Defendants: the first group consists of the  
19 entities that transmitted fraudulent DMCA notices (the "Notice Defendants"):

- 20 a. Defendant Frankfort News Corp. is an entity of unknown origin.
- 21 b. Defendant Frankfort Herald News Corp. is an entity of unknown  
22 origin.
- 23 c. Defendant Hearst Media LLC is an entity of unknown origin.
- 24 d. Defendant Heart Broadcasting Networks is an entity of unknown  
25 origin.
- 26 e. Defendant Hearst Broadcasting Networks is an entity of unknown  
origin.

1 f. Defendant Palastinetoday Mediacast LLC is an entity of  
2 unknown origin.

3 g. On information and belief, Defendant Juuso Haggman is an  
4 individual residing in Finland.

5 17. The second group of defendants consists of the owners and  
6 operators of the fake "news" sites that provided the facial justification for the  
7 fraudulent DMCA notices (the "Operating Defendants"):

8 a. On information and belief, Mitchell Shook is an individual residing  
9 in Washington and is the registrant of the domain name  
10 <frankfortherald.com>.

11 b. On information and belief, Alauddin Ahmed is an individual  
12 residing in Illinois and is the registrant of the domain names  
13 <palastinetimes.com> and <palastinetoday.com>.

14 c. On information and belief, Muhammad Ashraf is an individual  
15 residing in Pakistan and is the registrant of the domain name  
16 <mashablecity.com>.

17 d. On information and belief, Joshua Fitzgner is an individual of  
18 unknown residence, and is the author of one of the fake "news"  
19 articles that served as the basis for a fraudulent DMCA notice.

20 e. On information and belief, Juuso Haggman is an individual  
21 residing in Finland, and is the author of one of the fake "news"  
22 articles that served as the basis for a fraudulent DMCA notice.

23 f. On information and belief, Sheena William is an individual of  
24 unknown residence, and is the author of one of the fake "news"  
25 articles that served as the basis for a fraudulent DMCA notice.  
26

1 g. On information and belief, John Mathew is an individual of  
2 unknown residence, and is the author of one of the fake "news"  
3 articles that served as the basis for a fraudulent DMCA notice.

4 18. The third group of Defendants consists of the individuals and entities  
5 who approached the other Defendants and either instructed them to abuse the  
6 DMCA or were informed of the scheme's details and approved of it, and who  
7 benefited from this scheme (the "Benefitting Defendants"):

8 a. On information and belief, Phillip Cannella is an individual  
9 residing in Philadelphia, Pennsylvania and works as a financial  
10 advisor.

11 b. On information and belief, Brad Kuskin is an individual residing in  
12 the State of Florida and works as a consultant for criminal  
13 defense attorneys in West Palm Beach, Florida.

14 c. On information and belief, Marvellane Farms Ltd. is an entity  
15 located in Ottawa, Canada, which conducts farming  
16 operations.

17 d. On information and belief, Wagner Trucking Inc. is a Minnesota  
18 corporation that provides trucking and hauling services.

19 19. The identities of John Doe Defendants are currently unknown, but  
20 will be uncovered during discovery. These Defendants are individuals who  
21 designed, facilitated, and/or carried out Defendant's fraudulent DMCA  
22 scheme.

23 20. The identities of Roe Corporation Defendants are currently  
24 unknown, but will be uncovered during discovery. These defendants are entities  
25 that designed, facilitated, and/or carried out Defendant's fraudulent DMCA  
26 scheme.





1 34. The DMCA notice claimed that this "article" was infringed by a  
2 consumer review on the <pissedconsumer.com> web site with a publication  
3 date of June 27, 2013. (See Phillip Cannella review, attached as **Exhibit 6**.)

4 35. The Phillip Cannella DMCA notice was fraudulent. The "article" was  
5 not published on the <palastinetoday.com> web site on June 22, 2013.

6 36. Instead, shortly before sending the DMCA notice, Defendant  
7 Palastinetoday Mediacast LLC copied the content of the  
8 <pissedconsumer.com> review, uploaded it to the <palastinetoday.com> web  
9 site, and provided it with a false publication date to make it appear that it was  
10 published prior to the <pissedconsumer.com> review.

11 37. Defendant Joshua Fitzgner is the purported author of this "article,"  
12 and either carried out these fraudulent activities or was a willing participant in  
13 them.

14 38. Defendant Palastinetoday Mediacast LLC knew that the  
15 <pissedconsumer.com> review identified in its DMCA notice was not infringing  
16 any work owned by it, and in fact that it had committed copyright infringement  
17 by copying the entirety of the review.

18 39. Defendant Palastinetoday Mediacast LLC transmitted the DMCA  
19 notice to Google Inc. in bad faith, knowing that no copyright infringement had  
20 occurred, for the purpose of tricking Google Inc. into de-listing the  
21 <pissedconsumer.com> review from Google search engine results.

22 40. Defendant Phillip Cannella either instructed Defendant  
23 Palastinetoday Mediacast LLC to send this fraudulent DMCA notice, or was  
24 informed that it would be sent and approved of it.

25 41. On information and belief, Defendant Alauddin Ahmed was the  
26 registrant of the <palastinetoday.com> domain name at the time this fraudulent

1 DMCA notice was sent, and either instructed Defendant Palastinetoday  
2 Mediacast LLC to send it or assisted Palastinetoday in sending it.

3 **THE BRAD KUSKIN DMCA NOTICE**

4 42. On April 15, 2016, Defendant Frankfort News Corp sent a DMCA  
5 notice to Google Inc. concerning content on Plaintiff's web site  
6 <pissedconsumer.com>. The allegedly infringing content identified in the notice  
7 consisted of statements critical of Defendant Brad Kuskin. (See Brad Kuskin  
8 DMCA Notice, attached as **Exhibit 7**.)

9 43. The DMCA notice claimed copyright in an "article" published on  
10 the web site <frankfortherald.com>, with an alleged publication date of  
11 January 5, 2012. (See Brad Kuskin article, attached as **Exhibit 8**.)

12 44. The DMCA notice claimed that this "article" was infringed by a  
13 consumer review on the <pissedconsumer.com> web site with a publication  
14 date of January 7, 2012. (See Brad Kuskin review, attached as **Exhibit 9**.)

15 45. The Brad Kuskin DMCA notice was fraudulent. The "article" was not  
16 published on the <frankfortherald.com> web site on June 22, 2013. In fact,  
17 according to Archive.org's Wayback Machine, as late as August 17, 2015, the  
18 <frankfortherald.com> domain name resolved to a generic parking page.  
19 (See <frankfortherald.com> Wayback Machine record, attached as **Exhibit 10**.)

20 46. Instead, shortly before sending the DMCA notice, Defendant  
21 Frankfort News Corp copied the content of the <pissedconsumer.com> review,  
22 uploaded it to the <frankfortherald.com> web site, and provided it with a false  
23 publication date to make it appear that it was published prior to the  
24 <pissedconsumer.com> review.

25 47. Defendant John Mathew is the purported author of this "article,"  
26 and either carried out these fraudulent activities or was a willing participant in  
them.

1 48. Defendant Frankfort News Corp knew that the  
2 <pissedconsumer.com> review identified in its DMCA notice was not infringing  
3 any work owned by it, and in fact that it had committed copyright infringement  
4 by copying the entirety of the review.

5 49. Defendant Frankfort News Corp transmitted the DMCA notice to  
6 Google Inc. in bad faith, knowing that no copyright infringement had occurred,  
7 for the purpose of tricking Google Inc. into de-listing the <pissedconsumer.com>  
8 review from Google search engine results.

9 50. Defendant Brad Kuskin either instructed Defendant Frankfort News  
10 Corp to send this fraudulent DMCA notice, or was informed that it would be sent  
11 and approved of it.

12 51. On information and belief, Defendant Mitchell Shook was the  
13 registrant of the <frankfortherald.com> domain name at the time this fraudulent  
14 DMCA notice was sent, and either instructed Defendant Frankfort News Corp to  
15 send it or assisted Frankfort in sending it.

16 **THE WAGNER TRUCKING DMCA NOTICE**

17 52. On May 3, 2016, Defendant Juuso Haggman sent a DMCA notice to  
18 Google Inc. concerning content on Plaintiff's web site <pissedconsumer.com>.  
19 The allegedly infringing content identified in the notice consisted of statements  
20 critical of Defendant Wagner Trucking Inc. (See Wagner Trucking DMCA Notice,  
21 attached as **Exhibit 11**.)

22 53. The DMCA notice claimed copyright in an "article" published on  
23 the web site <mashablecity.com>, with an alleged publication date of October  
24 18, 2012. (See Wagner Trucking article, attached as **Exhibit 12**.)

25 54. The DMCA notice claimed that this "article" was infringed by a  
26 consumer review on the <pissedconsumer.com> web site with a publication  
date of May 15, 2013, as well as all <pissedconsumer.com> pages containing

1 reviews of Defendant Wagner Trucking. (See Wagner Trucking review, attached  
2 as **Exhibit 13**.)

3 55. The Wagner Trucking DMCA notice was fraudulent. The “article”  
4 was not published on the <mashablecity.com> web site on October 18, 2012. In  
5 fact, according to Archive.org's Wayback Machine, as late as January 10, 2016,  
6 the <mashablecity.com> domain name resolved to the web site located at  
7 <mashablecity.org>, which only contained the message “Mashable City is an  
8 open community project, aimed at turning Providence, RI into the most  
9 mashup-friendly place on earth.” (See <mashablecity.com> Wayback Machine  
10 record, attached as **Exhibit 14**.)

11 56. On information and belief, the <mashablecity.com> domain name  
12 was not used to host any content that could be described as “news articles”  
13 until sometime after March 2016.

14 57. Instead, shortly before sending the DMCA notice, Defendant Juuso  
15 Haggman copied the content of the <pissedconsumer.com> review, uploaded  
16 it to the <mashablecity.com> web site, and provided it with a false publication  
17 date to make it appear that it was published prior to the  
18 <pissedconsumer.com> review.

19 58. This particular scam was somewhat more sophisticated than the  
20 others. Instead of copying the <pissedconsumer.com> review verbatim,  
21 Defendant Juuso Haggman changed the name of the subject of the “article”  
22 from Wagner Trucking Inc. to Cam Transport Inc.<sup>2</sup> and altered a handful of  
23 details in the review. The vast majority of the review was copied verbatim,  
24 however.

25 \_\_\_\_\_  
26 <sup>2</sup> This way the fake “news article” could provide the basis of a fraudulent  
DMCA notice without even temporarily creating potential negative publicity for  
Wagner Trucking.



1 <frankfortherald.com> was actually copied from the allegedly infringing review  
2 on <ripoffreport.com>.

3 66. The <frankfortherald.com> web site contains the notice "Copyright  
4 © 2015 Heart Broadcasting Networks."

5 67. On information and belief, Defendant Heart Broadcasting Networks  
6 is a confederate or alter ego of the Defendants that sent fraudulent DMCA  
7 notices targeted at content on the <pissedconsumer.com> web site.

8 68. On March 15, 2016, Defendant Hearst Media LLC sent Google Inc. a  
9 DMCA notice requesting removal of content on the web site of a CBS affiliate  
10 located in Pittsburgh, claiming that the content of the CBS article was copied  
11 from an "article" on <frankfortherald.com>. (See March 15, 2016 CBS DMCA  
12 Notice, attached as **Exhibit 16.**)

13 69. On April 5, 2016, Defendant FrankFort Herald News Corp. sent  
14 Google Inc. a DMCA notice requesting removal of the exact same CBS article  
15 that was the target of the March 15 notice, claiming that the content of the CBS  
16 article was copied from the same "article" on <frankfortherald.com>.  
17 (See April 5, 2016 CBS DMCA Notice, attached as **Exhibit 17.**)

18 70. As with the DMCA notices directed at the <pissedconsumer.com>  
19 web site, these notices were fraudulent in that the allegedly infringed content  
20 on <frankfortherald.com> was actually copied from the allegedly infringing  
21 article on the CBS affiliate's web site.

22 71. As Defendants Hearst Media LLC and Defendant Frankfort Herald  
23 News Corp. sent identical DMCA notices directed at the same content  
24 allegedly copied from the <frankfortherald.com> web site, these Defendants  
25 are either confederates or alter egos of the entities that sent the fraudulent  
26 DMCA notices seeking to remove content on the <pissedconsumer.com> web  
site.

**6.0. FIRST CLAIM FOR RELIEF**  
**Violation of 17 U.S.C. § 512(f)**  
**(Against all Defendants)**

1  
2  
3 72. Plaintiff repeats and incorporates herein by reference the  
4 allegations in the preceding paragraphs of this Complaint.

5 73. On information and belief, none of the reviews on  
6 <pissedconsumer.com> infringed any copyright owned or administered by any  
7 Defendant.

8 74. On information and belief, Defendants knew or should have known  
9 that none of these reviews infringed on any copyright interest of any Defendant  
10 on the date each Defendant sent each fraudulent DMCA notice.

11 75. Defendants sent the DMCA notices for the purpose of interfering  
12 with Plaintiff's business and/or for the purpose of suppressing criticism of the  
13 subjects of the <pissedconsumer.com> reviews' products or business practices.

14 76. This is an improper use of the DMCA takedown scheme, and is  
15 specifically prohibited by law. 17 U.S.C. § 512(f).

16 77. Defendants violated 17 U.S.C. § 512(f) by knowingly materially  
17 misrepresenting that the targeted <pissedconsumer.com> reviews infringed their  
18 copyrights.

19 78. Defendants actually knew of the material falsity of their  
20 representations, as Defendants themselves committed copyright infringement in  
21 copying the <pissedconsumer.com> reviews and claiming them as their own.

22 79. If Defendants did not affirmatively know of the material falsity of  
23 their representations, they were willfully blind as to their material falsity.

24 80. As a direct and proximate result of Defendants' actions, Plaintiff has  
25 been injured in an amount to be determined at trial.

26 81. Such injury includes, but is not limited to, the financial and personal  
expenses associated with responding to the DMCA notices, diminution in

1 business resulting from content being de-indexed and/or removed by Google  
2 Inc., and harm to Plaintiff's free speech rights under the First Amendment.

3 82. Plaintiff has been forced to retain the services of an attorney to  
4 pursue this action, and is entitled to recover its attorneys' fees and any and all  
5 costs associated with pursuing this matter, as permitted under 17 U.S.C. §§ 505  
6 & 512(f).

7 83. In the alternative, Plaintiff asks for attorneys' fees as damages due  
8 to the bad-faith actions of Defendants in these matters.

9  
10 **7.0 SECOND CLAIM FOR RELIEF**  
11 **Unlawful, Unfair, and Fraudulent Business Practices**  
12 **Under California Business and Professions Code § 17200**  
13 **(Against all Defendants)**

14 84. Plaintiff repeats and incorporates herein by reference the  
15 allegations in the preceding paragraphs of this Complaint.

16 85. Defendants' acts and conduct, as alleged above in this Complaint,  
17 constitute unlawful, unfair, and/or fraudulent business acts or practices as  
18 defined by California Business and Professions Code § 17200 *et seq.*

19 86. Defendants' acts of unlawful, unfair, and fraudulent competition  
20 have caused harm to competition, to consumers, to the competitors of the  
21 business defendants, and to Plaintiff. In particular, Defendants' acts have  
22 deprived the consuming public of valuable information about the goods and  
23 services offered by the Defendants who benefited from their scheme, harming  
24 the public in general and giving such individuals and entities an unfair  
25 competitive advantage.

26 87. Defendants' acts of unlawful, unfair, and fraudulent competition  
have proximately caused Plaintiff to suffer injury in fact and loss of money  
and/or property (including as a result of expenses that Plaintiff has and will incur

1 in its efforts to prevent and deter Defendants from engaging in unlawful  
2 conduct) in an amount to be proven at trial.

3 88. Defendants' acts of unlawful, unfair, and fraudulent competition  
4 have also caused irreparable and incalculable injury to Plaintiff, its business, and  
5 its good will, and unless enjoined, could cause further irreparable and  
6 incalculable injury, whereby Plaintiff has no adequate remedy at law.

7  
8 **8.0 THIRD CLAIM FOR RELIEF**  
9 **Abuse of Process**  
10 **(Against all Defendants)**

11 89. Defendants used the DMCA process, including false sworn  
12 statements, to accomplish a purpose for which the DMCA notice and takedown  
13 procedure was not designed.

14 90. Defendants used the false and perjurious DMCA notice to suppress  
15 criticism and to deprive customers of valuable information, and not to address  
16 any copyright concerns.

17 91. Defendants deliberately perverted this particular legal process for its  
18 own benefit and in order to suppress Plaintiff's rights.

19 92. Defendants' actions were willful and wanton and were committed  
20 with deliberate disregard for the law, including the Copyright Act and laws  
21 prohibiting perjury.

22 93. As a direct and proximate result of Defendants' actions, Plaintiff has  
23 been injured in an amount to be determined at trial.

24 94. Plaintiff has been forced to retain the services of an attorney to  
25 pursue this action, and is entitled to recover its attorneys' fees and any and all  
26 costs associated with pursuing this matter. In the alternative, Plaintiff asks for  
attorneys' fees as damages due to the bad-faith actions of Defendant in these  
matters.

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**9.0 FOURTH CLAIM FOR RELIEF**  
**Civil Conspiracy**  
**(Against all Defendants)**

95. Plaintiff repeats and incorporates herein by reference the allegations in the preceding paragraphs of this Complaint.

96. Defendants, and each of them, conspired, confederated, and colluded with the other defendants to engage in the above described scheme which constitutes violation of 17 U.S.C. § 512(f), fraudulent and unfair business practices, and an abuse of legal process, to Defendants' economic benefit and Plaintiff's economic harm.

97. Defendants, and each of them, took affirmative steps to advance the conspiracy by taking part in formulating and sending the fraudulent DMCA notices that were calculated to have consumer reviews de-indexed.

98. On information and belief, Defendants jointly conceived and organized a scheme to send fraudulent DMCA notices for the purpose of tricking Google Inc. into de-indexing consumer reviews on <pissedconsumer.com>. Defendants engaged in these actions with full knowledge that those actions would cause harm to Plaintiff.

**10.0 PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully prays that this Court enter judgment for Plaintiff and against Defendants as follows:

- A. General damages based on Defendants' conduct as alleged herein in an amount to be determined at trial;
- B. Punitive damages based on Defendants' willful, malicious, intentional, and deliberate acts in an amount to be determined at trial;

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- C. Prejudgment and post-judgment interest at the rate allowed by law;
- D. Reasonable attorneys' fees and expenses of litigation;
- E. Injunctive relief prohibiting Defendants from continuing to send fraudulent DMCA notices in violation of 17 U.S.C. § 512(f), engage in unlawful, unfair, and/or fraudulent business acts or practices, and abuse of process as described above in this Complaint; and
- F. All other relief to which Plaintiff may be entitled.

**11.0 JURY DEMAND**

Plaintiff hereby requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure

Dated: September 2, 2016.

Respectfully Submitted,

RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza

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