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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

Venice PI, LLC,)	Case No.: 1:19-cv-169
MON LLC,)	
Millennium Funding, Inc.,)	(Copyright)
Bodyguard Productions, Inc.,)	
TBV Productions, LLC,)	COMPLAINT; EXHIBITS 1-3;
UN4 Productions, Inc., and)	DECLARATION OF ERIC SMITH
Hunter Killer Productions, Inc.)	
)	
Plaintiffs,)	(1) CONTRIBUTORY
vs.)	COPYRIGHT
)	INFRINGEMENT
DOE 1 d/b/a YIFY,)	(2) INTENTIONAL
DOE 2 d/b/a YTS,)	INDUCEMENT
MICHAEL NOLASCO,)	(3) DIRECT COPYRIGHT
BRENT BALDWIN,)	INFRINGEMENT
DOE 3 and DOES 4-10)	
)	
)	
Defendants.)	

COMPLAINT

Plaintiffs Venice PI, LLC, MON LLC, Millennium Funding, Inc., Bodyguard
Productions, Inc., TBV Productions, LLC, UN4 Productions, Inc., and Hunter Killer

Productions, Inc., (collectively “Plaintiffs”) file this Complaint against Defendants DOE 1, DOE 2, Michael Nolasco, Brent Baldwin, (collectively “Defendants”) and DOE 3 and allege as follows:

I. NATURE OF THE ACTION

1. Plaintiffs bring this action to stop the massive piracy of their motion pictures brought on by websites under the collective names YIFY and YTS and their users.

2. To halt Defendants’ illegal activities, Plaintiffs bring this action under the United States Copyright Act of 1976, as amended, 17 U.S.C. §§ 101, et seq. (the Copyright Act”) and allege that Defendants are liable for inducement, and direct and contributory copyright infringement in violation of 17 U.S.C. §§ 106 and 501.

II. JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this action pursuant to 17 U.S.C. §§ 101, et. seq., (the Copyright Act), 28 U.S.C. § 1331 (federal question), and 28 U.S.C. § 1338 (patents, copyrights, trademarks, and unfair competition).

4. Defendants solicit, transact, or are doing business within this jurisdiction, and have committed unlawful and tortious acts both within and outside this jurisdiction with the full knowledge that their acts would cause injury in this jurisdiction.

5. Defendants DOE 1 and DOE 2 cause harm to Plaintiffs’ business within

this District by diverting customers in this District to unauthorized Internet-based content distribution services through, at least, the websites yifymovies.is and yts.ag.

6. Defendants DOE 1 and DOE 2 have designed their interactive websites to individually target Hawaii users based upon their personal information such as web browsing history.

7. Upon information and belief, Defendants DOE 1 and DOE 2 collect log files including the Internet Protocol (“IP”) address, Internet Service Provider (“ISP”) and browser type of each user who visits their websites.

8. Upon information and belief, Defendants DOE 1 and DOE 2 use cookies and web beacons to store information such as personal preferences of users who visit their websites.

9. Upon information and belief, Defendants DOE 1 and DOE 2 obtain financial benefit from their users in Hawaii via third party advertisements such as Google through the Google AdSense program.

10. Upon information and belief, Defendants use the cookies, log files and/or web beacons to narrowly tailor the website viewing experience to the geolocation of the user. Particularly, users in Hawaii receive advertisements based upon their location and websites they have previously visited.

11. In the alternative, the Court has jurisdiction pursuant to Fed. R. Civ. P. 4(k)(2), the so-called federal long-arm statute, for at least the following reasons: (1)

Plaintiffs' claims arise under federal law; (2) the Defendants DOE 1 and DOE 2 purposely directed their electronic activity into the United States and target and attract a substantial number of users in the United States and, more particularly, this District; (3) Defendants do so with the manifest intent of engaging in business or other interactions with the United State; (4) the Defendants are not subject to jurisdiction in any state's courts of general jurisdiction; and (5) exercising jurisdiction is consistent with the United States Constitution and laws.

12. Defendants DOE 1 and DOE 2 use many United States based sources for their activities such as the Internet hosting and nameserver company Cloudflare, Inc.

13. Defendants DOE 1 and DOE 2 promote overwhelmingly if not exclusively motion pictures produced by United States companies on their websites.

14. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) - (c) because: (a) all or a substantial part of the events or omissions giving rise to the claims occurred in this District; and (c)(3) any of the Defendants not a resident of the United States may be sued in this District.

III. PARTIES

A. The Plaintiffs

15. The Plaintiffs are owners of the copyrights for the motion pictures (hereafter: "Works"), respectively, as shown in Exhibit "1" and listed below.

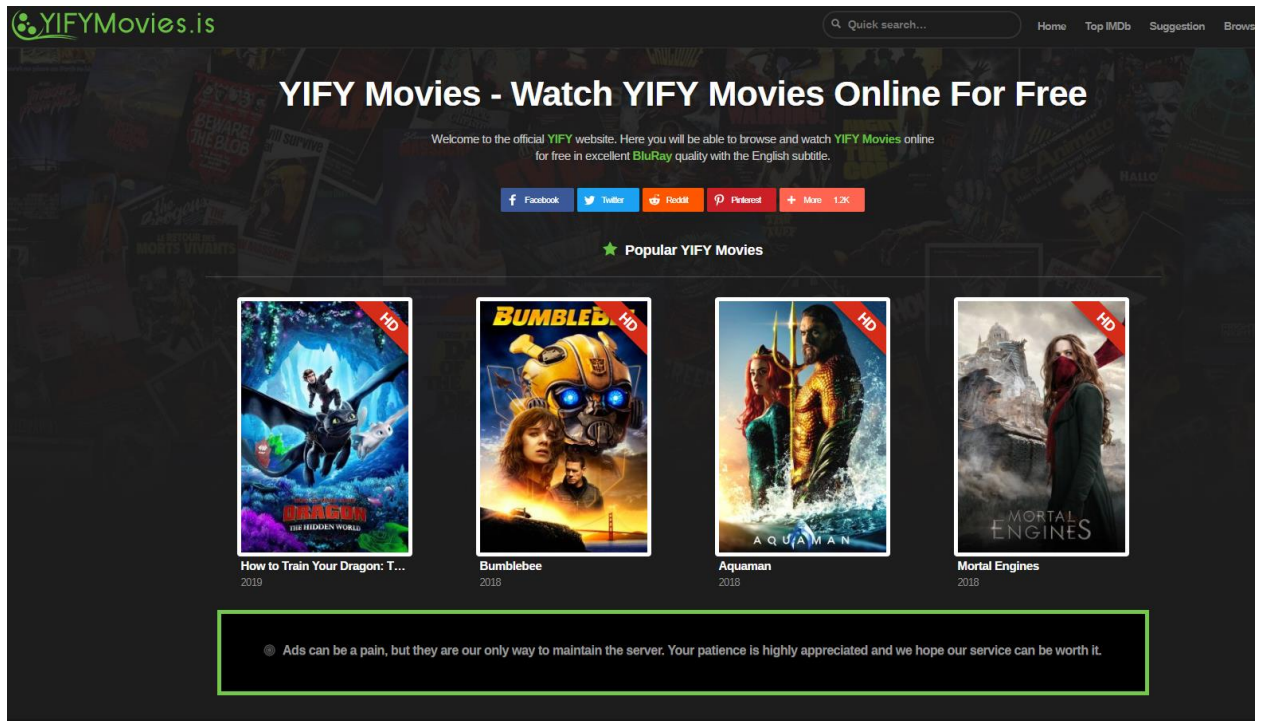
OWNER	MOTION PICTURE	Copyright Certificate Number
Venice PI, LLC	<i>Once Upon a Time in Venice</i>	PA2039391
MON LLC	<i>Singularity</i>	PAu3848900
Millennium Funding, Inc.	<i>Mechanic: Resurrection</i>	PA1998057
Bodyguard Productions, Inc.	<i>The Hitman's Bodyguard</i>	PAu3844508
TBV Productions, LLC	<i>I Feel Pretty</i>	Pau3896491
UN4 Productions, Inc.	<i>Boyka: Undisputed</i>	PA0002000772
Hunter Killer Productions, Inc.	<i>Hunter Killer</i>	PA2136168

B. The Defendants

16. Defendant DOE 1 operates an interactive website <http://yifymovies.is> (hereafter: “YIFY Website”) as of April 1, 2019.

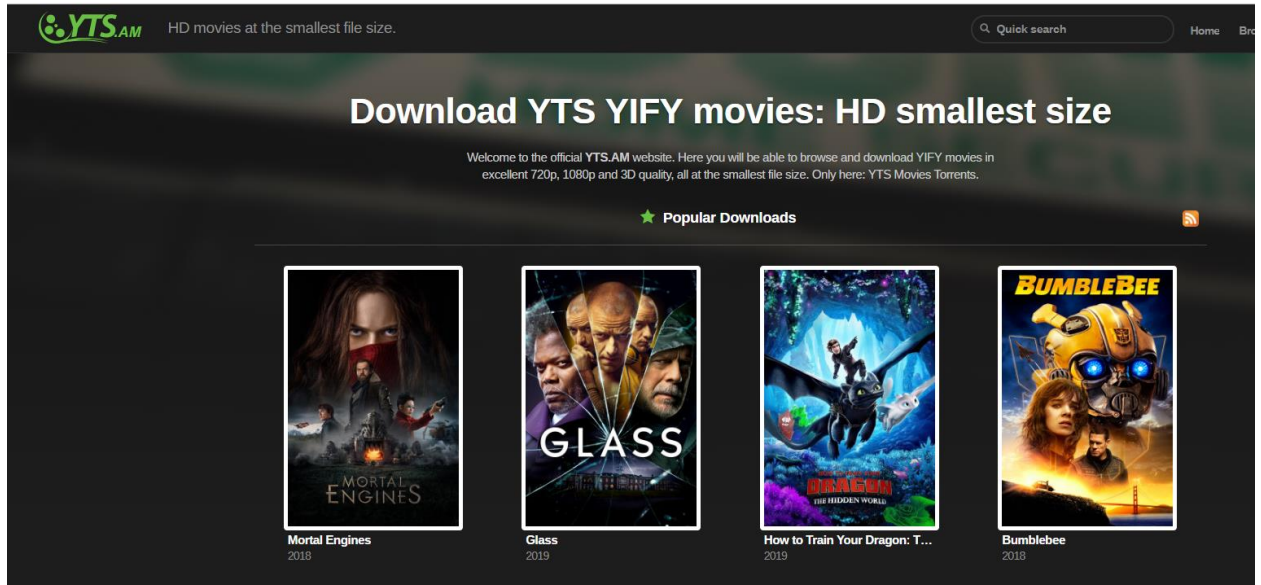
17. The YIFY website includes a library of copyright protected motion pictures, including Plaintiffs’, that can be streamed by users for free.

18. Defendant DOE 1 states on the YIFY website, “Welcome to the official YIFY website. Here you will be able to browse and watch YIFY Movies online for free in excellent BluRay quality with the English subtitle.”



19. Defendant DOE 2 operates an interactive website <http://yts.am> (hereafter: “YTS website”) which includes a library of torrent files for copyright protected motion pictures from YIFY, including Plaintiffs’. The torrent files can be used by a BitTorrent client application to download motion pictures for free. Upon information and belief, Defendant DOE 2 previously operated the website yts.ag, which now redirects to yts.am.

20. Defendant DOE 2 states on the YTS website, “Here you will be able to browse and download YIFY movies in excellent 720p, 1080p and 3D quality...”



21. The true names and capacities, whether individual, corporate, associate or otherwise, of Defendants DOE 1 and DOE 2 are unknown to Plaintiffs who therefore sues said Defendants by such fictitious names. Each of Defendants DOE 1 and DOE 2 is known to the Plaintiff only by the websites at which the alleged infringements take place.

22. As of April 2, 2019, the whois search records for the registrant of YIFY website only show a registrant "LFR2-IS" at an email address moviesteam@protonmail.com.

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WHOIS lookup result for yifymovies.is

% This is the ISNIC Whois server.
%
% Rights restricted by copyright.
% See https://www.isnic.is/en/about/copyright

domain:      yifymovies.is
registrant:   LRF2-IS
admin-c:      LRF2-IS
tech-c:       LRF2-IS
zone-c:       CN25-IS
billing-c:    LRF2-IS
nserver:      brad.ns.cloudflare.com
nserver:      mary.ns.cloudflare.com
dnssec:       unsigned delegation
created:      September 15 2017
expires:      September 15 2019
source:       ISNIC

nic-hdl:      LRF2-IS
address:      FR
e-mail:       moviesteam@protonmail.com
created:      September 15 2017
source:       ISNIC

role:         CloudFlare NOC
nic-hdl:      CN25-IS
address:      665 3rd Street, Suite 207
address:      San Francisco, CA 94107
address:      US
phone:        +1 6503198930
e-mail:       noc@cloudflare.com
created:      January 19 2012
source:       ISNIC

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23. As of April 2, 2019, the whois search records for the registrant of the YTS websites (yts.am and yts.gg) only show registrant name was “REDACTED FOR PRIVACY” by Gandi SAS (<http://www.gandi.net>).

WHOIS lookup result for yts.am

Domain Name: yts.am
Registry Domain ID: UNDEF-ROID
Registrar WHOIS Server: whois.gandi.net
Registrar URL: <http://www.gandi.net>
Updated Date: 2018-10-09T14:48:32Z
Creation Date: 2017-11-16T15:39:51Z
Registrar Registration Expiration Date: 2019-11-16T00:00:00Z
Registrar: GANDI SAS
Registrar IANA ID: 81
Registrar Abuse Contact Email: abuse@support.gandi.net
Registrar Abuse Contact Phone: +33.170377661
Reseller:
Domain Status: ok <http://www.icann.org/epp#ok>
Domain Status:
Domain Status:
Domain Status:
Domain Status:
Registry Registrant ID: REDACTED FOR PRIVACY
Registrant Name: REDACTED FOR PRIVACY
Registrant Organization: TechModo Limited
Registrant Street: Obfuscated whois Gandi-63-65 boulevard Massena
Registrant City: Obfuscated whois Gandi-Paris
Registrant State/Province: Paris
Registrant Postal Code: 75013
Registrant Country: FR
Registrant Phone: +33.170377666
Registrant Phone Ext:
Registrant Fax: +33.143730576

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WHOIS lookup result for yts.gg

Domain Name: yts.gg
Registry Domain ID: 766342-CI
Registrar WHOIS Server: whois.gandi.net
Registrar URL: http://www.gandi.net
Updated Date: 2019-03-27T13:12:36Z
Creation Date: 2018-04-26T14:06:16Z
Registrar Registration Expiration Date: 2019-04-26T14:06:16Z
Registrar: GANDI SAS
Registrar IANA ID: 81
Registrar Abuse Contact Email: abuse@support.gandi.net
Registrar Abuse Contact Phone: +33.170377661
Reseller:
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited
Domain Status:
Domain Status:
Domain Status:
Registry Registrant ID: REDACTED FOR PRIVACY
Registrant Name: REDACTED FOR PRIVACY
Registrant Organization:
Registrant Street: Obfuscated whois Gandi-63-65 boulevard Massena
Registrant City: Obfuscated whois Gandi-Paris
Registrant State/Province: Paris
Registrant Postal Code: 75013
Registrant Country: FR
Registrant Phone: +33.170377666
Registrant Phone Ext:
Registrant Fax: +33.143730576
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24. Defendant Michael Nolasco is, upon information and belief, a resident of Honolulu, Hawaii, and over 18 years of age.

25. Defendant Michael Nolesco is the son of an individual who is or was subscriber of Internet service from Hawaiian Telcom in Hawaii and assigned Internet Protocol (“IP”) address 72.234.162.87.

26. Defendant Brent Baldwin is, upon information and belief, a resident of Honolulu, Hawaii, and over 18 years of age.

27. Defendant Brent Baldwin is or was a subscriber of Internet service from Verizon Wireless and assigned IP address 174.239.5.113.

28. Defendant DOE 3 is, upon information and belief, a resident of Honolulu, Hawaii, and over 18 years of age.

29. Defendant DOE 3 is the son of Lourdes Coughlin, who is or was a subscriber of Internet service from Verizon Wireless and assigned IP address 70.212.134.243.

30. DOES 4-10, upon information and belief, provide streaming sources for the YIFY website of Defendant DOE 1.

31. Cloudflare, Inc. provides hosting and nameserver service for the websites of Defendants DOE 1 and DOE 2. Plaintiffs intends to subpoena Cloudflare, Inc. in order to learn the identities of Defendants DOE 1 and DOE 2. Plaintiff intends to subpoena Lourdes Coughlin to obtain the name of her son (DOE 3) who is responsible for the acts alleged here. Plaintiffs intend to subpoena the Internet Service Providers associated with the Internet Protocol addresses that provide the streaming sources for the website of DOE 1 to obtain the identities of DOES 4-10. Further discovery may be necessary in some circumstances in order to be certain of the identity of the proper Defendant. Plaintiffs believe that

information obtained in discovery will lead to the identification of each Defendants' true names and permit the Plaintiffs to amend this Complaint to state the same. Plaintiffs further believe that the information obtained in discovery may lead to the identification of additional infringing parties to be added to this Complaint as Defendants. Plaintiff will amend this Complaint to include the proper names and capacities when they have been determined. Plaintiffs are informed and believe, and based thereon allege, that each of the fictitiously named Defendants participated in and are responsible for the acts described in this Complaint and damages resulting therefrom.

IV. JOINDER

32. Pursuant to Fed. R. Civ. P. 20(a)(1), each of the Plaintiffs are properly joined because, as set forth in detail above and below, the Plaintiffs assert: (a) a right to relief arising out of the same transaction, occurrence, or series or transactions, namely the distribution of and use of YIFY and YTS websites for streaming and distributing Plaintiffs' Works; and (b) that there are common questions of law and fact.

33. Pursuant to Fed. R. Civ. P. 20(a)(2), each of the Defendants was properly joined because, as set forth in more detail below, the Plaintiffs assert: (a) a right to relief arising out of the same transaction, occurrence, or series or transactions, namely the distribution of Plaintiffs' Works via the YIFY and YTS

websites of Defendants DOE 1 and DOE 2; and (b) there are common questions of law and fact. Plaintiffs assert that Defendants DOE 1 and DOE 2 are jointly and severally liable for the infringing activities of each other and for inducing and/or contributing to the infringements of the other Defendants

V. FACTUAL BACKGROUND

A. The Plaintiffs Own the Copyrights to the Works

34. The Plaintiffs are the owners of the copyright in the Works, respectively. The Works are the subjects of copyright registrations, and this action is brought pursuant to 17 U.S.C. § 411. *See* Exhibit “1”.

35. Each of the Works are motion pictures currently offered for sale in commerce.

36. Defendants had notice of Plaintiffs’ rights through at least the credits indicated in the content of the motion pictures which bore proper copyright notices.

37. Defendants also had notice of Plaintiffs’ rights through general publication and advertising associated with the motion picture, and packaging and copies, each of which bore a proper copyright notice.

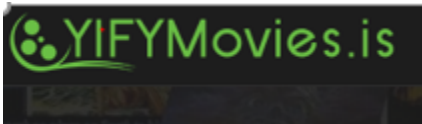
38. Upon information and belief, the name YIFY mentioned in the YIFY website and the YTS website is derived from the name Yiftach Swery, the founder of YIFY Torrent Solutions.

39. Upon information and belief, the name YTS mentioned in the YTS

website is an abbreviation of YIFY Torrent Solutions.

40. Upon information and belief, the YIFY website is streaming motion pictures from at least torrent sources of the YTS library.

41. Upon information and belief, both YIFY and YTS are operating in concert. Both the YIFY and YTS websites include what appears to be the same trademark – namely a green semi-circle with three large full circles and one small full circle therein akin to a traditional movie reel with film extending therefrom.



42. The YIFY website of Defendant DOE 1 allows users to stream Plaintiffs' Works.

43. Defendant DOE 1 does not have a license from Plaintiffs to publicly perform or stream copies of Plaintiffs' Works.

44. Upon information and belief, the YIFY website of Defendant DOE 1 is using source repositories (including those associated with Defendant DOE 2) to allow users to stream copyright protected content, including Plaintiffs' Works.

45. Upon information and belief, the YTS website of Defendant DOE 2 is providing torrent files, many including the name "yts.ag" in their file names, that can be used by a BitTorrent protocol client application protocol to download

copyright protected content, including Plaintiffs' Works from Torrent sites. Exhibit "2" (Mechanic Resurrection (2016) [YTS.AG] and Singularity (2017) [YTS.AG]).

46. Torrent sites are websites that index torrent files that are currently being made available for copying and distribution by people using the BitTorrent protocol. When a user of Defendant DOE 2's YTS website select a motion picture, the user receives a torrent file associated with that motion picture. The user can use a BitTorrent protocol client application to run the torrent file to download a copy of the motion picture.

47. Defendant DOE 2 does not have a license from Plaintiffs to publicly perform or distribute copies of Plaintiffs' Works.

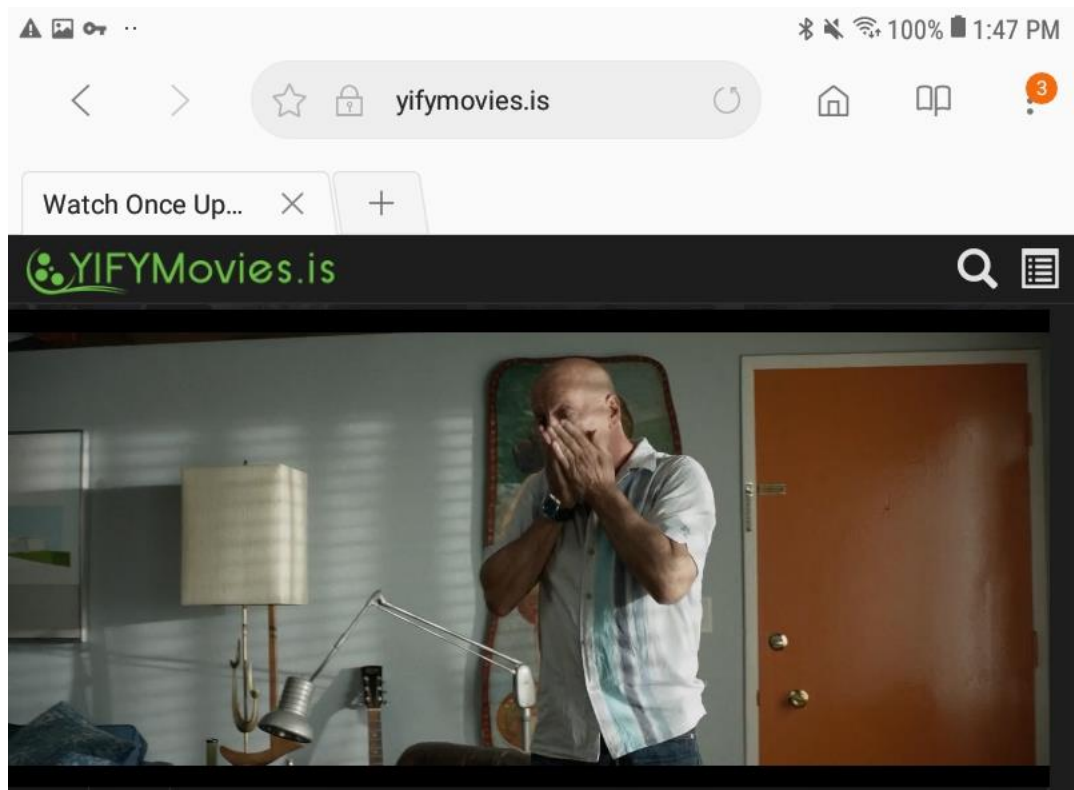
48. Users of the websites of Defendants DOE 1 and DOE 2 use the websites for their intended and unquestionably infringing purposes, most notably to obtain immediate, unrestricted, and unauthorized access to unauthorized copies of Plaintiffs' Copyrighted Works.

49. Defendants DOE 1 and DOE 2 promote their websites for overwhelmingly, if not exclusively, infringing purposes, and that is how the users use the websites.

50. The commercial value of Defendant DOE 1's and DOE 2's websites depends on high-volume use of unauthorized content through the website. Defendants DOE 1 and DOE 2 promise their users reliable and convenient access

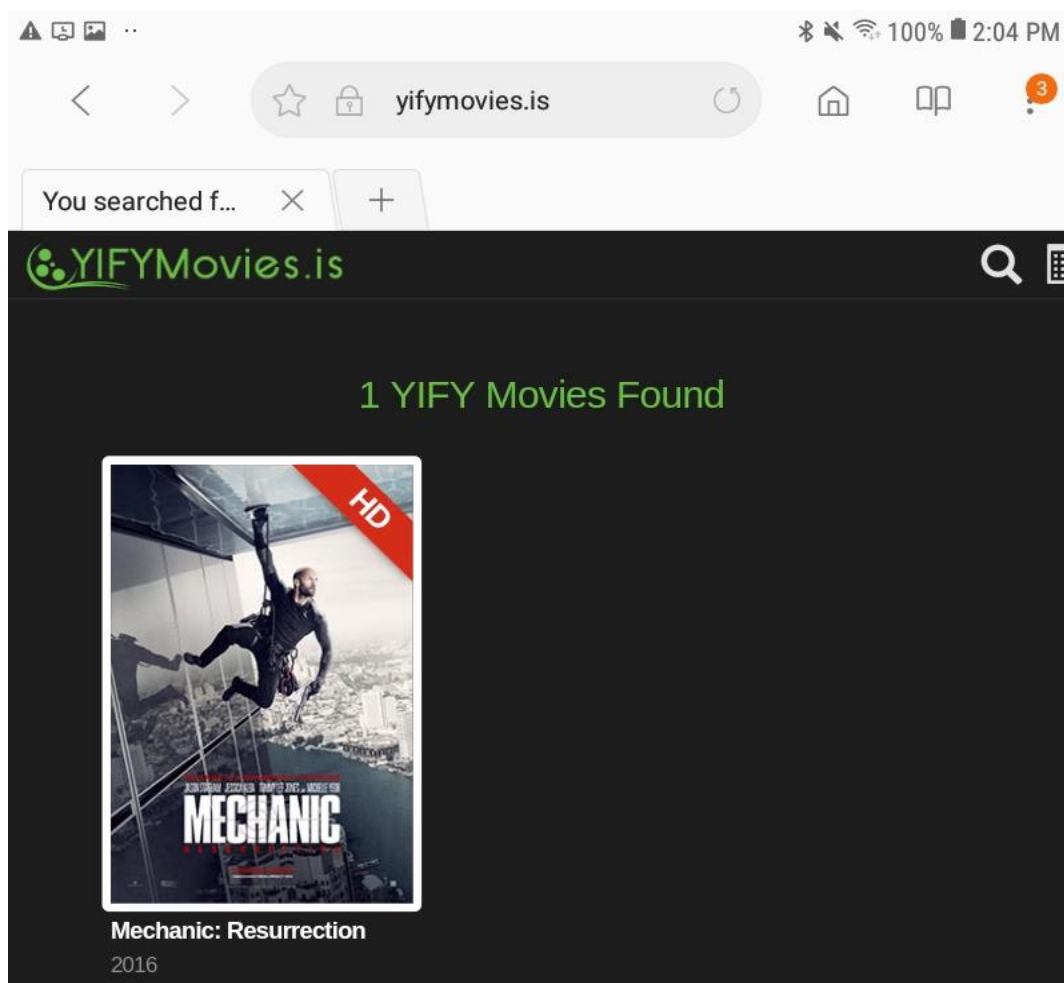
to all the content they can watch and users visit the websites based on Defendant DOE 1's and DOE 2's apparent success in delivering infringing content to their customers.

51. Defendant DOE 1 is streaming copies of the motion picture *Once Upon A Time In Venice* via the YIFY website.



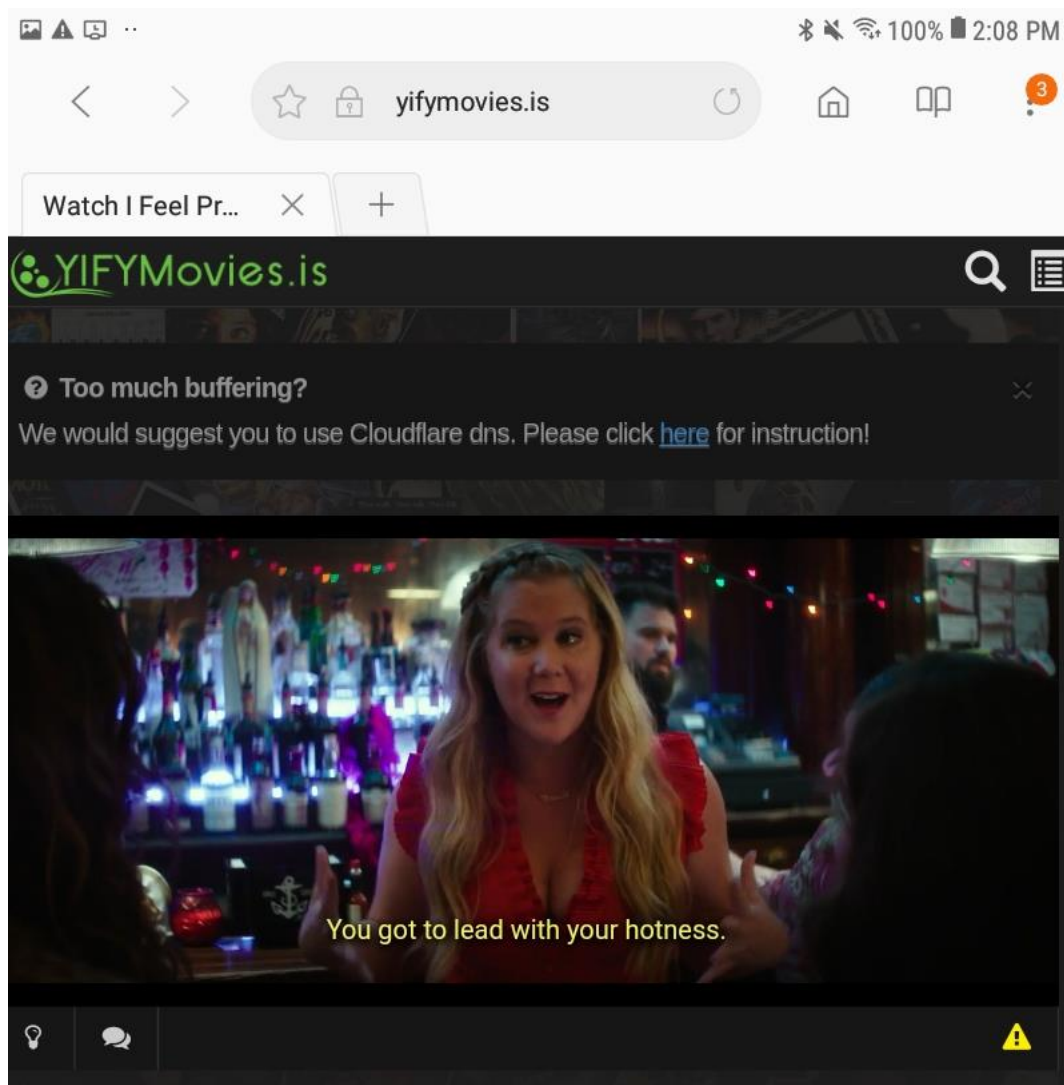
52.

53. Defendant DOE 1 is streaming copies of the motion picture *Mechanic: Resurrection* via the YIFY website.



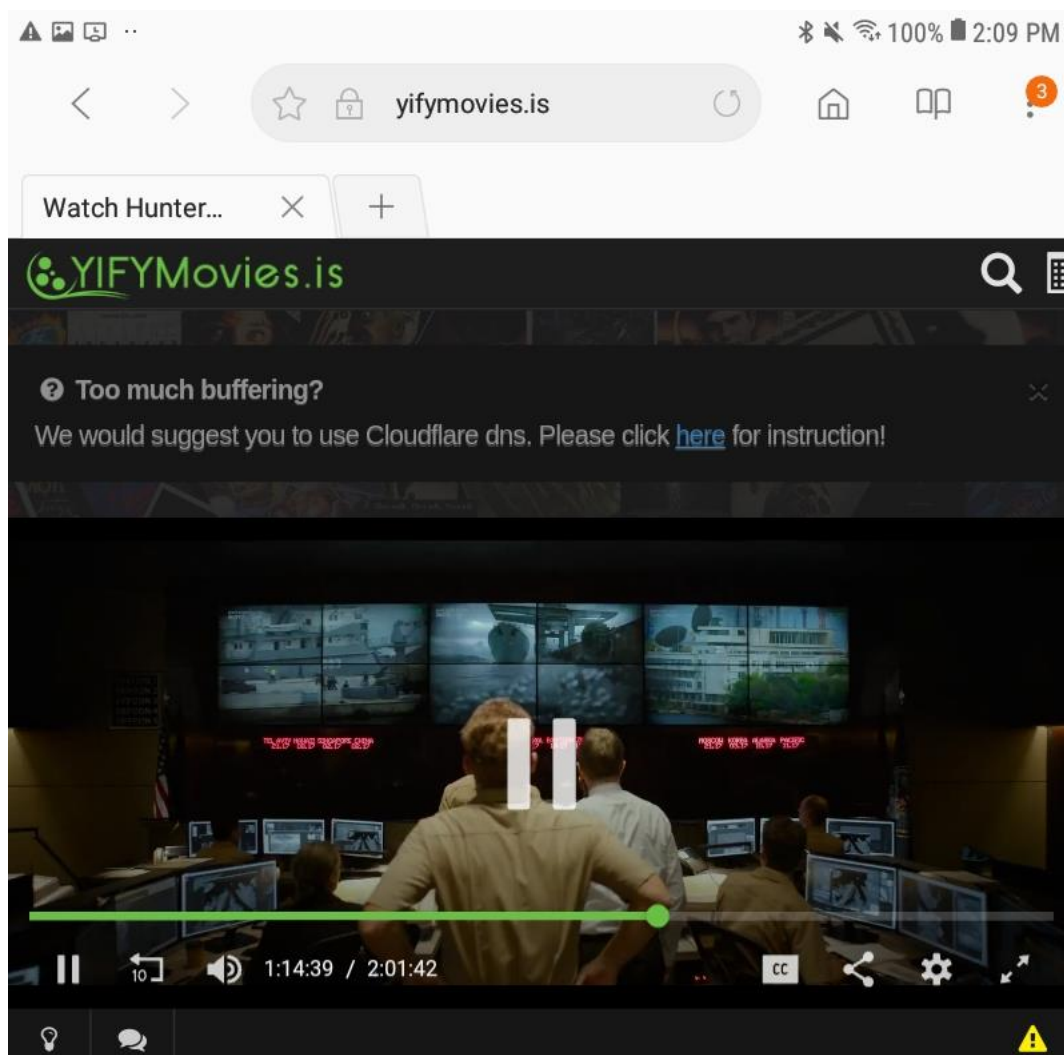
54.

55. Defendant DOE 1 is streaming copies of the motion picture *I Feel Pretty* via the YIFY website.



56.

57. Defendant DOE 1 is streaming copies of the motion picture *Hunter Killer* via the YIFY website.



58.

59. Plaintiffs' agents monitored the Internet traffic associated with the YIFY website while streaming the motion pictures and recorded the IP addresses which are likely the sources of the content. Exhibit "3".

60. Defendant DOE 3 used the YTS website of Defendant DOE 2 or another source to copy at least a portion of the motion picture *Boyka: Undisputed* on April 9, 2017 at IP address 70.212.134.243.

61. Defendant DOE 3 used the website of Defendant DOE 2 or another

source to copy a portion of the motion picture *Once Upon a Time in Venice* and share multiple copies of the motion picture on July 4, 2018 at IP address 70.212.134.243.

62. Defendant Michael Nolasco used the website of Defendant DOE 2 or another source to copy a portion of and share multiple copies of the motion picture *The Hitman's Bodyguard* on Sept. 3, 2017 to Sept. 27, 2017 at IP address 72.234.162.87.

63. Defendant Michael Nolasco used the website of Defendant DOE 2 or another source to copy a portion of the motion picture *Once Upon a Time in Venice* on November 19, 2017 at IP address 72.234.162.87.

64. Defendant Michael Nolasco used the website of Defendant DOE 2 or another source to copy a portion of the motion picture *Mechanic: Resurrection* on December 24, 2017 at IP address 72.234.162.87.

65. Defendant Michael Nolasco used the website of Defendant DOE 2 or another source to copy a portion of the motion picture *Singularity* on February 13, 2018 at IP address 72.234.162.87.

66. Defendant Brent Baldwin used the website of Defendant DOE 2 or another source to copy a portion of the motion picture *The Hitman's Bodyguard* on Nov. 2, 2017 at IP address 174.239.5.113.

67. Defendant Brent Baldwin used the website of Defendant DOE 2 or

another source to copy a portion of the motion picture *Once Upon a Time in Venice* on Feb. 11, 2018 at IP address 174.239.5.113.

68. The deceptive language on Defendant DOE 1's and DOE 2's websites convinced Defendant Brent Baldwin that the websites allowed him to legally watch free movies.

VI. FIRST CLAIM FOR RELIEF
(Intentional Inducement – Against Defendants DOE 1 and DOE 2)

69. Plaintiffs re-allege and incorporate by reference the allegations contained in each of the foregoing paragraphs.

70. Plaintiffs are the copyright owners of the Works which each contains an original work of authorship.

71. Defendants DOE 1 and DOE 2 have actual knowledge of third parties' infringement of Plaintiffs' exclusive rights under the Copyright Act.

72. Defendants DOE 1 and DOE 2 intentionally induced the infringement of Plaintiffs' exclusive rights under the Copyright Act, including infringement of Plaintiffs' exclusive right to publicly perform and distribute copies of Copyrighted Works.

73. As intended and encouraged by Defendant DOE 1, the YIFY website connects users to sources and/or sites that publicly perform copies of Plaintiffs' Copyrighted Works. The operators of these sources directly infringe Plaintiffs'

exclusive rights by providing unauthorized public performances of the works to the public, including to users of Defendant DOE 1's website.

74. These operators, or others operating in concert with them, control the facilities and equipment used to store and distribute the content, and they actively and directly cause the content to be performed when users click on a link for the content on the YIFY website of Defendants DOE 1.

75. As intended and encouraged by Defendant DOE 2, the website provides torrent files that connect users to Torrent sources and/or sites that deliver copies of Plaintiffs' Copyrighted Works. The operators of these Torrent sources directly infringe Plaintiffs' exclusive rights by providing unauthorized copies of the works to the public, including to users of Defendant DOE 2's website.

76. Once the user of Defendant DOE 2's website has obtained a complete copy of the Plaintiffs' Copyrighted Works, that particular user also becomes another Torrent source that delivers copies of Plaintiffs' Copyrighted Works.

77. Defendant DOE 2 induces the aforementioned acts of infringement by supplying the torrent files that facilitate, enable, and create direct links between their users and the infringing Torrent sources, and by actively inducing, encouraging and promoting the use of the website for blatant copyright infringement.

78. Defendants DOE 1's and DOE 2's intentional inducement of the infringement of Plaintiffs' rights in each of their Copyrighted Works constitutes a

separate and distinct act of infringement.

79. Defendants DOE 1's and DOE 2's inducement of the infringement of Plaintiffs' Copyrighted Works is willful, intentional, and purposeful, and in disregard of and with indifference to the rights of the Plaintiffs.

80. Defendant DOE 1's and DOE 2's actions are a direct and proximate cause of the infringements of Plaintiffs' Works.

**VII. SECOND CLAIM FOR RELIEF
(Contributory Copyright Infringement based upon Material
Contribution – Against Defendants DOE 1 and DOE 2)**

81. Plaintiffs re-allege and incorporate by reference the allegations contained in each of the foregoing paragraphs.

82. Defendants DOE 1 and DOE 2 have actual or constructive knowledge of infringement of Plaintiffs' exclusive rights under the Copyright Act. Defendants DOE 1 and DOE 2 knowingly and materially contribute to such infringing activity.

83. Defendant DOE 1 knowingly and materially contributes to the infringement of Plaintiffs' exclusive rights under the Copyright Act, including infringement of Plaintiffs' exclusive right to publicly perform their works. Defendant DOE 1 designs and promotes the use of the YIFY website to connect customers to unauthorized online sources that stream copies of Plaintiffs' Copyrighted Works. The operators of these source repositories directly infringe Plaintiffs' public performance rights by providing copies of the works to the public,

including to users of the YIFY website. The operators, or others operating in concert with them, control the facilities and equipment used to store and deliver copies of the content, and they actively and directly cause the content to be streamed when users click on a link of the YIFY website for the content.

84. Defendant DOE 1 knowingly and materially contributes to the aforementioned acts of infringement by supplying the YIFY website that facilitates, encourages, enables, and creates direct links between website users and infringing operators of the streaming services, and by actively encouraging, promoting, and contributing to the use of the website for blatant copyright infringement.

85. Defendant DOE 2 knowingly and materially contributes to the infringement of Plaintiffs' exclusive rights under the Copyright Act, including infringement of Plaintiffs' exclusive right to distribute their works. Defendant DOE 2 designs and promotes the use of the YTS website to provide torrent files that connect customers to unauthorized online torrent sources to download copies of Plaintiffs' Copyrighted Works. The operators of these torrent sources directly infringe Plaintiffs' distribution rights by providing copies of the Works to the public, including to YTS website users. The operators, or others operating in concert with them, control the facilities and equipment used to store and deliver copies of the the content, and they actively and directly cause the content to be distributed when users run the torrent file obtained from the YTS website.

86. Defendants DOE 1 and DOE 2 knowingly and materially contributes to the aforementioned acts of infringement by supplying the website that facilitates, encourages, enables, and creates direct links between website users and infringing operators of the streaming and Torrent services, and by actively encouraging, promoting, and contributing to the use of the website for blatant copyright infringement.

87. Defendants DOE 1's and DOE 2's knowing and material contribution to the infringement of Plaintiffs' rights in each of their Copyrighted Works constitutes a separate and distinct act of infringement.

88. Defendant DOE 1's and DOE 2's knowing and material contribution to the infringement of Plaintiffs' Copyrighted Works is willful, intentional, and purposeful, and in disregard of and with indifference to the rights of Plaintiffs.

89. As a direct and proximate result of the infringement to which Defendants DOE 1 and DOE 2 knowingly and materially contributes, Plaintiffs are entitled to damages and Defendants DOE 1's and DOE 2's profits in amounts to be proven at trial.

90. Defendants DOE 1 and DOE 2 obtained a direct financial interest, financial advantage, and/or economic consideration from the infringements in Hawaii as a result of their infringing actions in the United States.

91. Defendant DOE 1's and DOE 2's actions are a direct and proximate

cause of the infringements of Plaintiffs' Works.

VIII. THIRD CLAIM FOR RELIEF
(Direct Copyright Infringement against Defendants Doe 3, Michael Nolasco and Brent Baldwin)

92. Plaintiffs re-allege and incorporate by reference the allegations contained in each of the foregoing paragraphs.

93. Plaintiff UN4 Productions, Inc. is the copyright owner of the Work which contains an original work of authorship.

94. Plaintiff Venice PI, LLC is the copyright owner of the Work which contains an original work of authorship.

95. Defendant DOE 3 copied the constituent elements of the registered Works of Plaintiffs UN4 Production, Inc. and Venice PI, LLC that are original.

96. Plaintiffs UN4 Productions, Inc. and Venice PI, LLC did not authorize, permit, or provide consent to Defendant DOE 3 to copy, reproduce, redistribute, perform, or display their Works.

97. As a result of the foregoing, Defendant DOE 3 violated the Plaintiff's exclusive right to: (A) Reproduce the Work in copies, in violation of 17 U.S.C. §§ 106(1) and 501; (B) Redistribute copies of the Work to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501; (C) Perform the copyrighted Work, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the Work's images; and, (D) Display the copyrighted

Work, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the Work non-sequentially and transmitting said display of the Work by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publicly" display.)

98. Each of the Defendant DOE 3's infringements was committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

99. Plaintiff Bodyguard Productions, Inc. is the copyright owner of the Work which contains an original work of authorship.

100. Plaintiff MON, LLC is the copyright owner of the Work which contains an original work of authorship.

101. Plaintiff Millennium Funding, Inc. is the copyright owner of the Work which contains an original work of authorship.

102. Defendant Michael Nolasco copied the constituent elements of the registered Works of Plaintiffs Bodyguard Production, Inc., Venice PI, LLC, MON, LLC and Millennium Funding, Inc. that are original.

103. Plaintiffs Bodyguard Production, Inc., Venice PI, LLC, MON, LLC and Millennium Funding, Inc. did not authorize, permit, or provide consent to Defendant Michael Nolasco to copy, reproduce, redistribute, perform, or display their Works.

104. As a result of the foregoing, Defendant Michael Nolasco violated the

exclusive right of Plaintiffs Bodyguard Production, Inc., Venice PI, LLC, MON, LLC and Millennium Funding, Inc. to: (A) Reproduce the Work in copies, in violation of 17 U.S.C. §§ 106(1) and 501; (B) Redistribute copies of the Work to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501; (C) Perform the copyrighted Work, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the Work's images; and, (D) Display the copyrighted Work, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the Work non-sequentially and transmitting said display of the Work by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publicly" display.)

105. Each of the Defendant Michael Nolasco's infringements was committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

106. Defendant Brent Baldwin copied the constituent elements of the registered Works of Plaintiffs Bodyguard Productions, Inc. and Venice PI, LLC that are original.

107. Plaintiffs Bodyguard Productions, Inc. and Venice PI, LLC did not authorize, permit, or provide consent to Defendant Brent Baldwin to copy, reproduce, redistribute, perform, or display their Works.

108. As a result of the foregoing, Defendant Brent Baldwin violated the

exclusive right of Plaintiffs Bodyguard Productions, Inc. and Venice PI, LLC to: (A) Reproduce the Work in copies, in violation of 17 U.S.C. §§ 106(1) and 501; (B) Redistribute copies of the Work to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501; (C) Perform the copyrighted Work, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the Work's images; and, (D) Display the copyrighted Work, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the Work non-sequentially and transmitting said display of the Work by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publicly" display.)

109. Each of the Defendant Brent Baldwin's infringements was committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

110. By engaging in the infringement alleged in this Complaint, the Defendants deprived not only the producer of the Works from income that could have been derived when these films were shown in public theaters and offered for sale or rental, but also all persons involved in the production and marketing of this film, numerous owners of local theaters and retail outlets in Hawai'i and their employees, and, ultimately, the local economy. The Defendants' misconduct therefore offends public policy.

111. The Plaintiffs have suffered damages that were proximately caused by

each of the Defendants' copyright infringements including, but not limited to lost sales, price erosion, and a diminution of the value of its copyright.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs respectfully requests that this Court:

(A) enter temporary, preliminary and permanent injunctions enjoining each Defendant from continuing to contribute to infringement of the Plaintiffs' copyrighted Works;

(B) Entry of an Order pursuant to 17 U.S.C. §512(j) and/or 28 U.S.C §1651(a) that, Cloudflare and any other service provider cease providing service for the websites: (i) yifymovies.is; (ii) yts.ag; and (iii) yts.am immediately cease said service;

(C) that, upon Plaintiffs' request, those in privity with Defendants and those with notice of the injunction, including any Internet search engines, Web hosts, domain-name registrars, and domain name registries and/or their administrators that are provided with notice of the injunction, cease facilitating access to any or all domain names and websites through which Defendants DOE 1 and DOE 2 engage in the aforementioned infringements;

(D) award the Plaintiffs' actual damages and Defendants' profits in such amount as may be found; alternatively, at Plaintiffs' election, for maximum statutory damages per Work pursuant to 17 U.S.C. § 504-(a) and (c);

(E) award the Plaintiffs their reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

(F) grant the Plaintiffs any and all other and further relief that this Court deems just and proper.

The Plaintiffs hereby demand a trial by jury on all issues properly triable by jury.

DATED: Kailua-Kona, Hawaii, April 4, 2019.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper

Attorney for Plaintiffs

OWNER	MOTION PICTURE	Copyright Certificate Number
Venice PI, LLC	<i>Once Upon a Time in Venice</i>	PA2039391
MON LLC	<i>Singularity</i>	PAu3848900
Millennium Funding, Inc.	<i>Mechanic: Resurrection</i>	PA1998057
Bodyguard Productions, Inc.	<i>The Hitman's Bodyguard</i>	PAu3844508
TBV Productions, LLC	<i>I Feel Pretty</i>	Pau3896491
UN4 Productions, Inc.	<i>Boyka: Undisputed</i>	PA0002000772
Hunter Killer Productions, Inc.	<i>Hunter Killer</i>	PA2136168

Exhibit "1"

No	IP	Hash	Title	Hit Date UTC-8
1	70.212.134.243	7E43BE43B0BC80433A8FDD082ACFE78F57094CF9	Boyka Undisputed IV 2016 1080p WEBRip 1.2 GB - iExTV	4/9/2017 23:12
2	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 7:52
3	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 7:55
4	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 8:55
5	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 8:57
6	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 9:44
7	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 14:18
8	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 15:14
9	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 15:18
10	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 16:16
11	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 17:16
12	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 18:17
13	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 19:18
14	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 20:18
15	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 21:19
16	70.212.134.243	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	7/4/2017 21:23
1	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/3/2017 0:28
2	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/3/2017 1:23
3	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/3/2017 1:53
4	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 4:32
5	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 4:33
6	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 4:49
7	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 5:33
8	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 5:49
9	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 6:34
10	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 6:49
11	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 7:18
12	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 7:50
13	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 8:11
14	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 8:30
15	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 8:50
16	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/17/2017 9:20
17	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/22/2017 8:23
18	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/22/2017 8:24
19	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/26/2017 22:57
20	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/26/2017 23:21
21	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/26/2017 23:58
22	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/27/2017 0:08
23	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/27/2017 0:29
24	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/27/2017 0:41
25	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/27/2017 0:48
26	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/27/2017 0:58
27	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/27/2017 1:00
28	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/27/2017 1:20
29	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/27/2017 1:35
30	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/27/2017 2:00
31	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/27/2017 2:36
32	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/27/2017 5:20
33	72.234.162.87	19BCED3AA2DE5B4855E4856CC7EA1CC41972EEBD	www.torrenting.com - The.Hitmans.Bodyguard.2017.HDRip.XviD.AC3-EVO	9/27/2017 5:21
34	72.234.162.87	A59EC62050A414C10F1A5AD852230BE32A398E2A	Once.Upon.a.Time.in.Venice.2017.720p.BluRay.x264-NeZu	11/19/2017 6:01
35	72.234.162.87	A59EC62050A414C10F1A5AD852230BE32A398E2A	Once.Upon.a.Time.in.Venice.2017.720p.BluRay.x264-NeZu	11/19/2017 7:01
36	72.234.162.87	496F368F8D8C895168D3BA57B5A809DE5FDAF8C8	Bedeveled.2016.BRRip.XviD.AC3-EVO	11/20/2017 8:52
37	72.234.162.87	496F368F8D8C895168D3BA57B5A809DE5FDAF8C8	Bedeveled.2016.BRRip.XviD.AC3-EVO	11/20/2017 8:52
38	72.234.162.87	B6275554D5304C6AA4E39C299503EFB0385DBC81	Bullet Head 2017 720p WEBRip 700 MB - iExTV	12/9/2017 8:51
39	72.234.162.87	15D0FFD08EA199E877886437DDC8C9A36C4EB026	Mechanic Resurrection (2016) [YTS.AG]	12/24/2017 3:28
40	72.234.162.87	15D0FFD08EA199E877886437DDC8C9A36C4EB026	Mechanic Resurrection (2016) [YTS.AG]	12/24/2017 3:28
41	72.234.162.87	15D0FFD08EA199E877886437DDC8C9A36C4EB026	Mechanic Resurrection (2016) [YTS.AG]	12/24/2017 3:57
42	72.234.162.87	15D0FFD08EA199E877886437DDC8C9A36C4EB026	Mechanic Resurrection (2016) [YTS.AG]	12/24/2017 4:20
43	72.234.162.87	15D0FFD08EA199E877886437DDC8C9A36C4EB026	Mechanic Resurrection (2016) [YTS.AG]	12/24/2017 8:13
44	72.234.162.87	15D0FFD08EA199E877886437DDC8C9A36C4EB026	Mechanic Resurrection (2016) [YTS.AG]	12/24/2017 8:13
45	72.234.162.87	AA78B76A7D3A3A85E4E22476EEB547EC66764802	Singularity (2017) [YTS.AG]	1/23/2018 8:48
46	72.234.162.87	AA78B76A7D3A3A85E4E22476EEB547EC66764802	Singularity (2017) [YTS.AG]	1/23/2018 8:48
47	72.234.162.87	AA78B76A7D3A3A85E4E22476EEB547EC66764802	Singularity (2017) [YTS.AG]	2/13/2018 8:22
48	72.234.162.87	AA78B76A7D3A3A85E4E22476EEB547EC66764802	Singularity (2017) [YTS.AG]	2/13/2018 8:31
49	72.234.162.87	17D3EF78ED8A4D27C268E102A8F37499D955FDC6	I Kill Giants (2017) [WEBRip] [720p] [YTS.AM]	3/26/2018 4:03
1	174.239.5.113	3105E6C382E4DDA242DAC769DB8F77D86D0302AA	The.Hitmans.Bodyguard.2017.720p.WEBRip.XviD.AC3-FGT	11/2/2017 22:04
2	174.239.5.113	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	2/11/2018 6:34
3	174.239.5.113	0DAE755156B5443042CCECF362948D363E0EABAC9	Once Upon A Time In Venice (2017) [YTS.AG]	2/11/2018 6:36

No	IP	Source Port	Hit Date UTC-8		ISP
1	104.16.161.13	443	2019-03-29	13:44:25.365	Cloudflare
2	169.54.206.44	443	2019-03-29	13:44:26.088	SoftLayer Technologies
3	151.101.24.64	443	2019-03-29	13:44:26.823	Fastly
4	31.13.70.7	443	2019-03-29	13:44:26.826	Facebook Ireland Ltd
5	172.217.164.99	443	2019-03-29	13:44:27.107	Google

Exhibit "3"

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

Venice PI, LLC, et al.)	
)	Case No.: 1:19-cv-
Plaintiffs,)	(Copyright)
vs.)	DECLARATION OF ERIC SMITH
DOE 1, et al.)	
)	
Defendants.)	
)	
)	
)	
)	
)	

DECLARATION OF ERIC SMITH

Eric Smith, hereby declares under penalty of laws of the United States of America that the following is true and correct:

1. I am over the age of 18 and am competent to make this declaration. This declaration is based upon my personal knowledge and the facts stated therein are true and accurate. The screen shots shown below are true and accurate copies as explained below.

2. I am a resident of Captain Cook, Hawaii and the owner of Kona IT Solutions, a sole proprietorship headquartered in Hawaii County, Hawaii. Kona IT

Solutions provides computer consultation services such as network security, database management, hardware and software support, etc. for small businesses.

3. I received my Bachelor of Business Information Systems in 2009 from the University of Alaska, in Anchorage, Alaska.

4. I have over 14 years of experience in the field of computer consultation services and managing multi-state networks. I have experience in the following server software platforms: IBM Domino 8.5-9.0.1 System Administrator; IBMi V5R4-V7R1 Security Officer; JDEdwards A7.3 and A9.1 Administrator; iOS v3-9, Windows XP-10, Microsoft Server 2003, 2008, 2012 Administrator of Domain Controller for DNS, Active Directory, DHCP Administrator.

5. Plaintiffs retained my company Kona IT Solutions to investigate the websites: yifymovies.is (hereafter: “YIFY website”) and yts.gg (hereafter: “YTS website”).

6. The WHOIS records for websites are viewable at the website <https://whois.gandi.net/en>. The screen shots below accurately reflect the results returned when the WHOIS records for the websites yifymovies.is; yts.am and yts.gg were requested.

WHOIS lookup result for yifymovies.is

```
% This is the ISNIC Whois server.
%
% Rights restricted by copyright.
% See https://www.isnic.is/en/about/copyright
```

```
domain:      yifymovies.is
registrant:  LRF2-IS
admin-c:     LRF2-IS
tech-c:      LRF2-IS
zone-c:      CN25-IS
billing-c:   LRF2-IS
nserver:     brad.ns.cloudflare.com
nserver:     mary.ns.cloudflare.com
dnssec:      unsigned delegation
created:     September 15 2017
expires:     September 15 2019
source:      ISNIC

nic-hdl:     LRF2-IS
address:     FR
e-mail:      moviesteam@protonmail.com
created:     September 15 2017
source:      ISNIC

role:        CloudFlare NOC
nic-hdl:     CN25-IS
address:     665 3rd Street, Suite 207
address:     San Francisco, CA 94107
address:     US
phone:       +1 6503198930
e-mail:      noc@cloudflare.com
created:     January 19 2012
source:      ISNIC
```

7.

WHOIS lookup result for yts.am

Domain Name: yts.am
 Registry Domain ID: UNDEF-ROID
 Registrar WHOIS Server: whois.gandi.net
 Registrar URL: http://www.gandi.net
 Updated Date: 2018-10-09T14:48:32Z
 Creation Date: 2017-11-16T15:39:51Z
 Registrar Registration Expiration Date: 2019-11-16T00:00:00Z
 Registrar: GANDI SAS
 Registrar IANA ID: 81
 Registrar Abuse Contact Email: abuse@support.gandi.net
 Registrar Abuse Contact Phone: +33.170377661
 Reseller:
 Domain Status: ok http://www.icann.org/epp#ok
 Domain Status:
 Domain Status:
 Domain Status:
 Domain Status:
 Registry Registrant ID: REDACTED FOR PRIVACY
 Registrant Name: REDACTED FOR PRIVACY
 Registrant Organization: TechModo Limited
 Registrant Street: Obfuscated whois Gandi-63-65 boulevard Massena
 Registrant City: Obfuscated whois Gandi-Paris
 Registrant State/Province: Paris
 Registrant Postal Code: 75013
 Registrant Country: FR
 Registrant Phone: +33.170377666
 Registrant Phone Ext:
 Registrant Fax: +33.143730576
 Registrant Fax Ext:
 Registrant Email: 1f20538c8bfd123a5c24ed791a052702-7035434@contact.gandi.net
 Registry Admin ID: REDACTED FOR PRIVACY
 Admin Name: REDACTED FOR PRIVACY
 Admin Organization: TechModo Limited
 Admin Street: Obfuscated whois Gandi-63-65 boulevard Massena
 Admin City: Obfuscated whois Gandi-Paris
 Admin State/Province: Paris
 Admin Postal Code: 75013
 Admin Country: FR
 Admin Phone: +33.170377666

8.

WHOIS lookup result for yts.gg

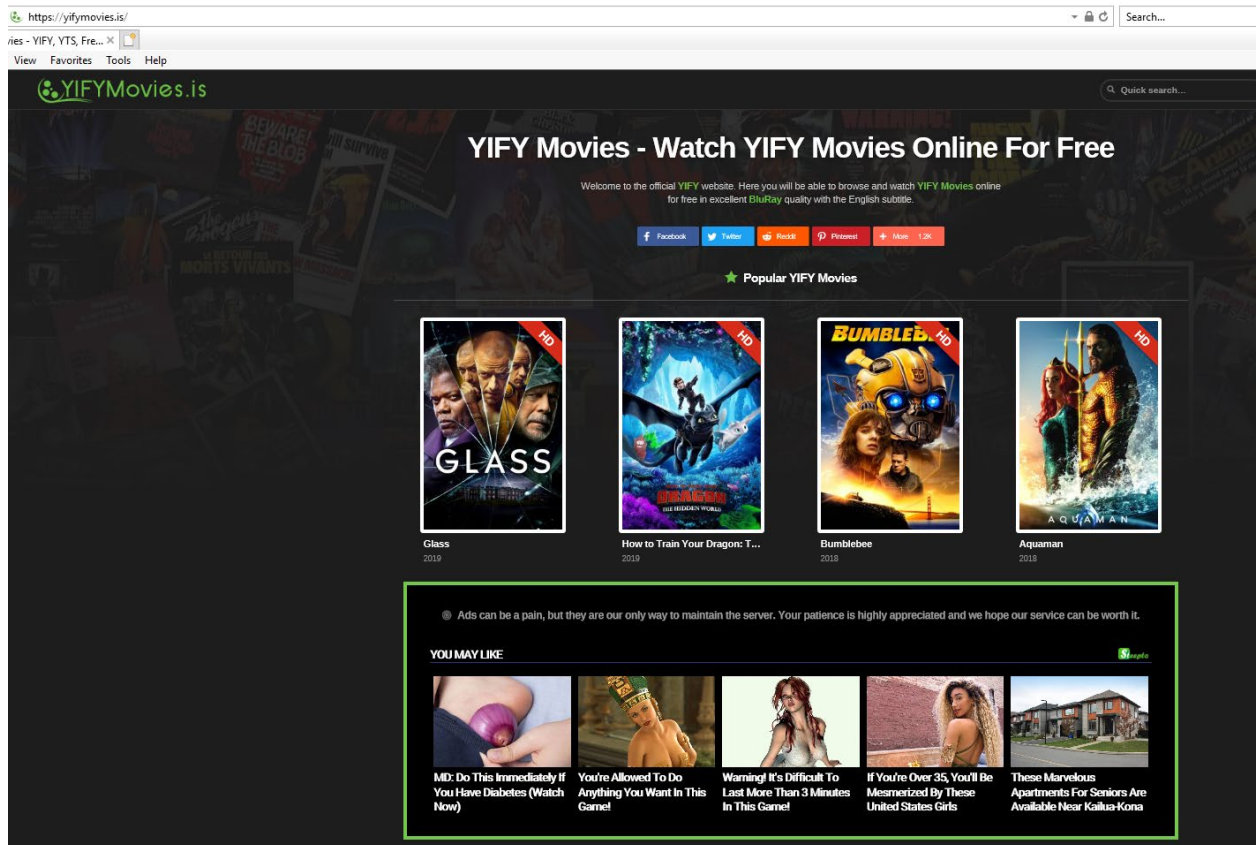
```

Domain Name: yts.gg
Registry Domain ID: 766342-CI
Registrar WHOIS Server: whois.gandi.net
Registrar URL: http://www.gandi.net
Updated Date: 2019-03-27T13:12:36Z
Creation Date: 2018-04-26T14:06:16Z
Registrar Registration Expiration Date: 2019-04-26T14:06:16Z
Registrar: GANDI SAS
Registrar IANA ID: 81
Registrar Abuse Contact Email: abuse@support.gandi.net
Registrar Abuse Contact Phone: +33.170377661
Reseller:
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited
Domain Status:
Domain Status:
Domain Status:
Domain Status:
Registry Registrant ID: REDACTED FOR PRIVACY
Registrant Name: REDACTED FOR PRIVACY
Registrant Organization:
Registrant Street: Obfuscated whois Gandi-63-65 boulevard Massena
Registrant City: Obfuscated whois Gandi-Paris
Registrant State/Province: Paris
Registrant Postal Code: 75013
Registrant Country: FR
Registrant Phone: +33.170377666
Registrant Phone Ext:
Registrant Fax: +33.143730576
Registrant Fax Ext:
Registrant Email: d6088230c73f7d092391ce836a8c1519-5924952@contact.gandi.net
Registry Admin ID: REDACTED FOR PRIVACY
Admin Name: REDACTED FOR PRIVACY
Admin Organization:
Admin Street: Obfuscated whois Gandi-63-65 boulevard Massena
Admin City: Obfuscated whois Gandi-Paris
Admin State/Province: Paris
Admin Postal Code: 75013
Admin Country: FR

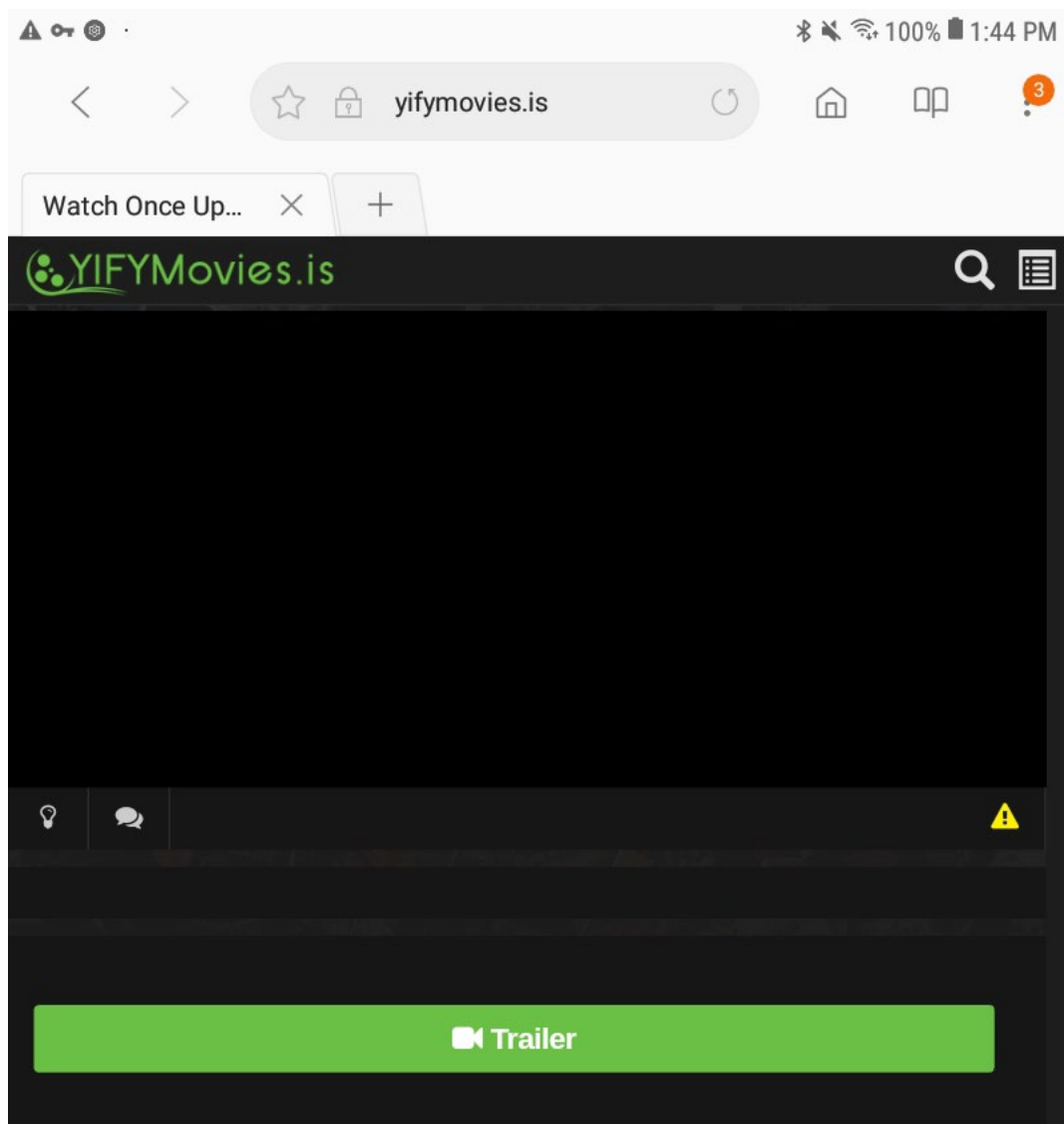
```

9.

10. Using a Samsung Galaxy A tablet device and from a location in Kailua-Kona, Hawaii, I navigated to the YIFY website (yifymovies.is) on March 29, 2019. The screenshot below is an accurate representation of the YIFY website as I viewed it on a Windows PC on April 3, 2019.

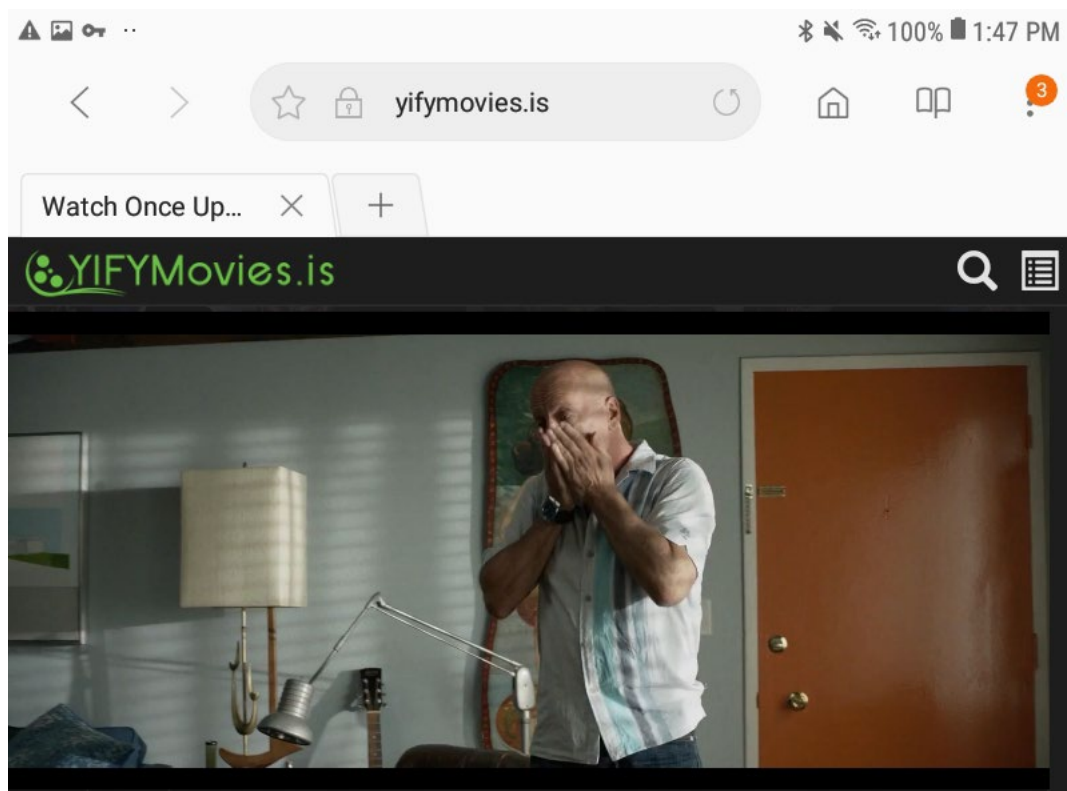


11. In the search bar of the website I entered the title “Once Upon A Time In Venice”. The following page was automatically generated with a play button over what appeared to be the movie. I tapped the play button and I was able to reproduce a full copy of the movie *Once Upon A Time In Venice*.

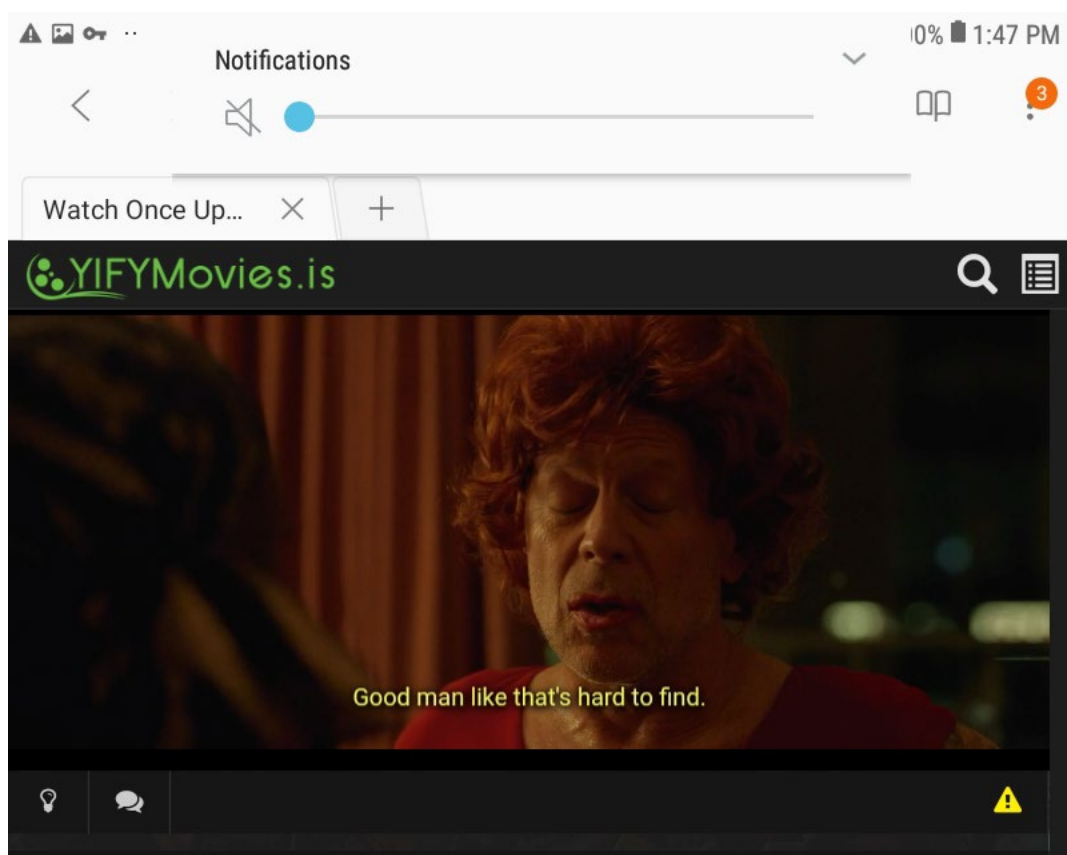


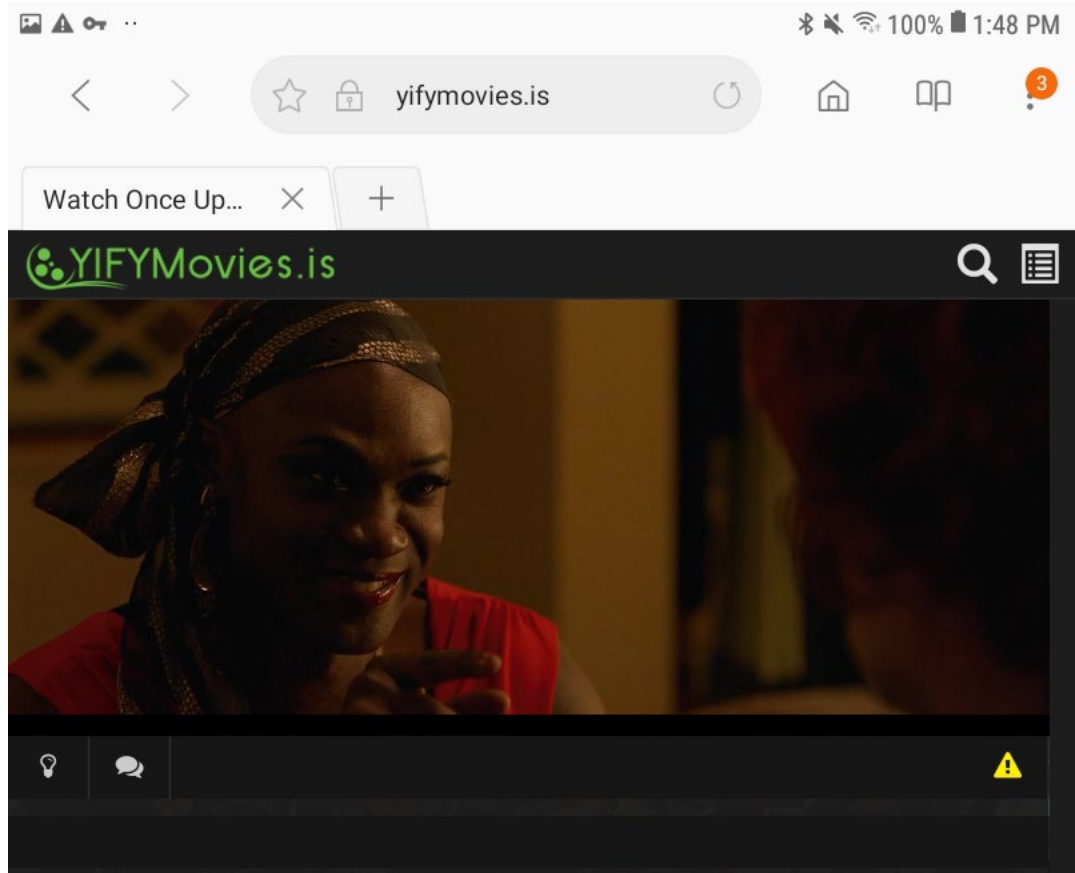
12.

13.

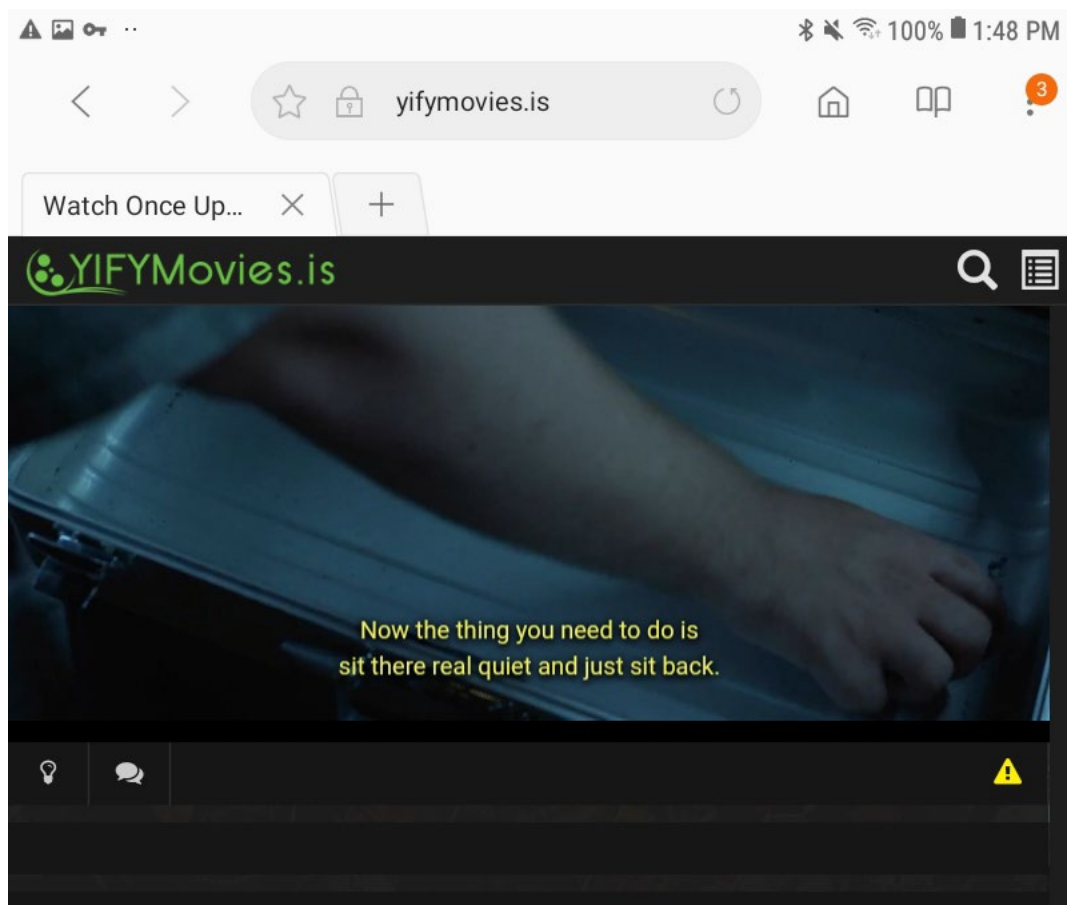


14.

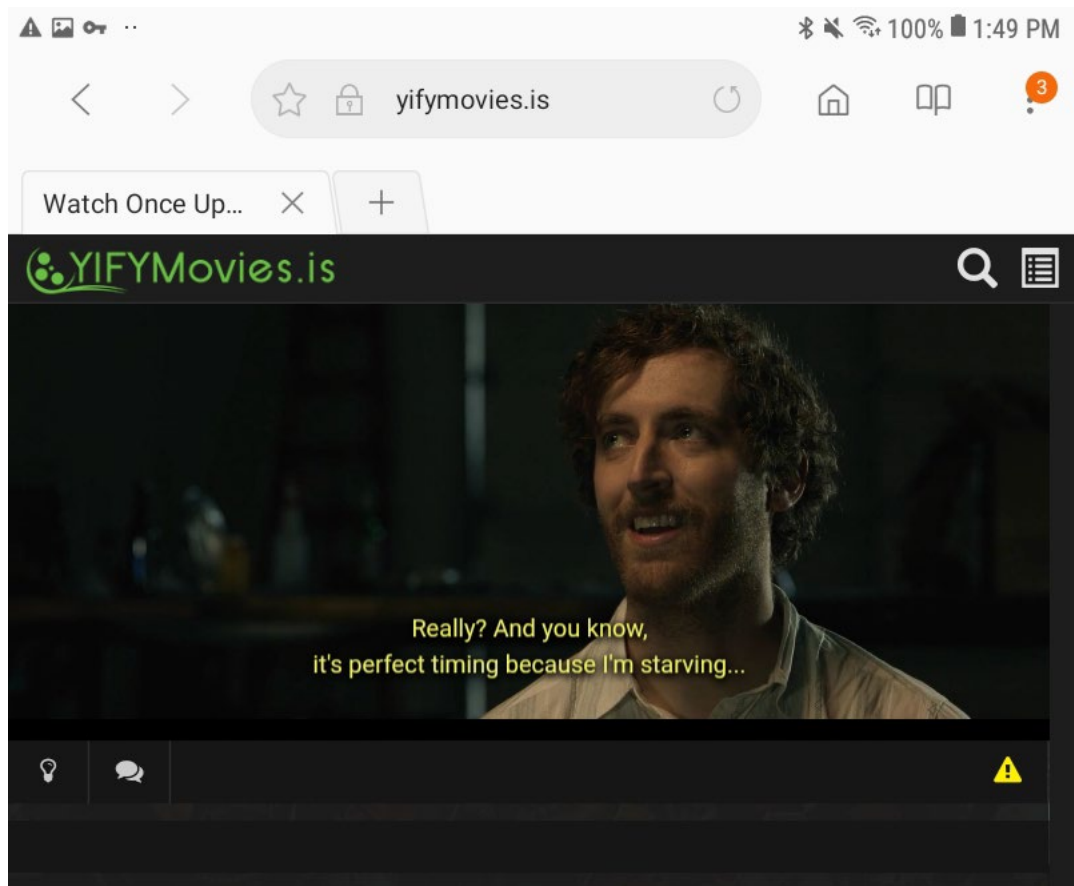




15.

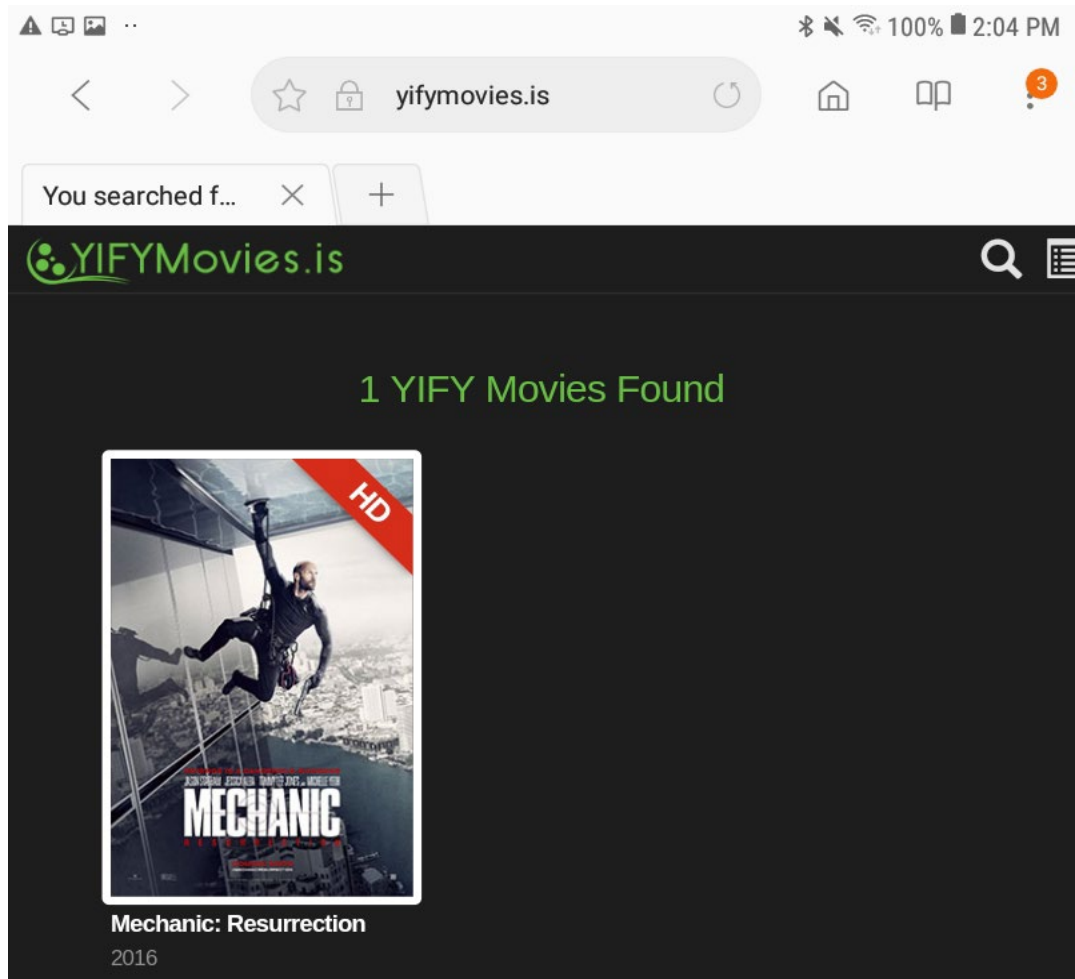


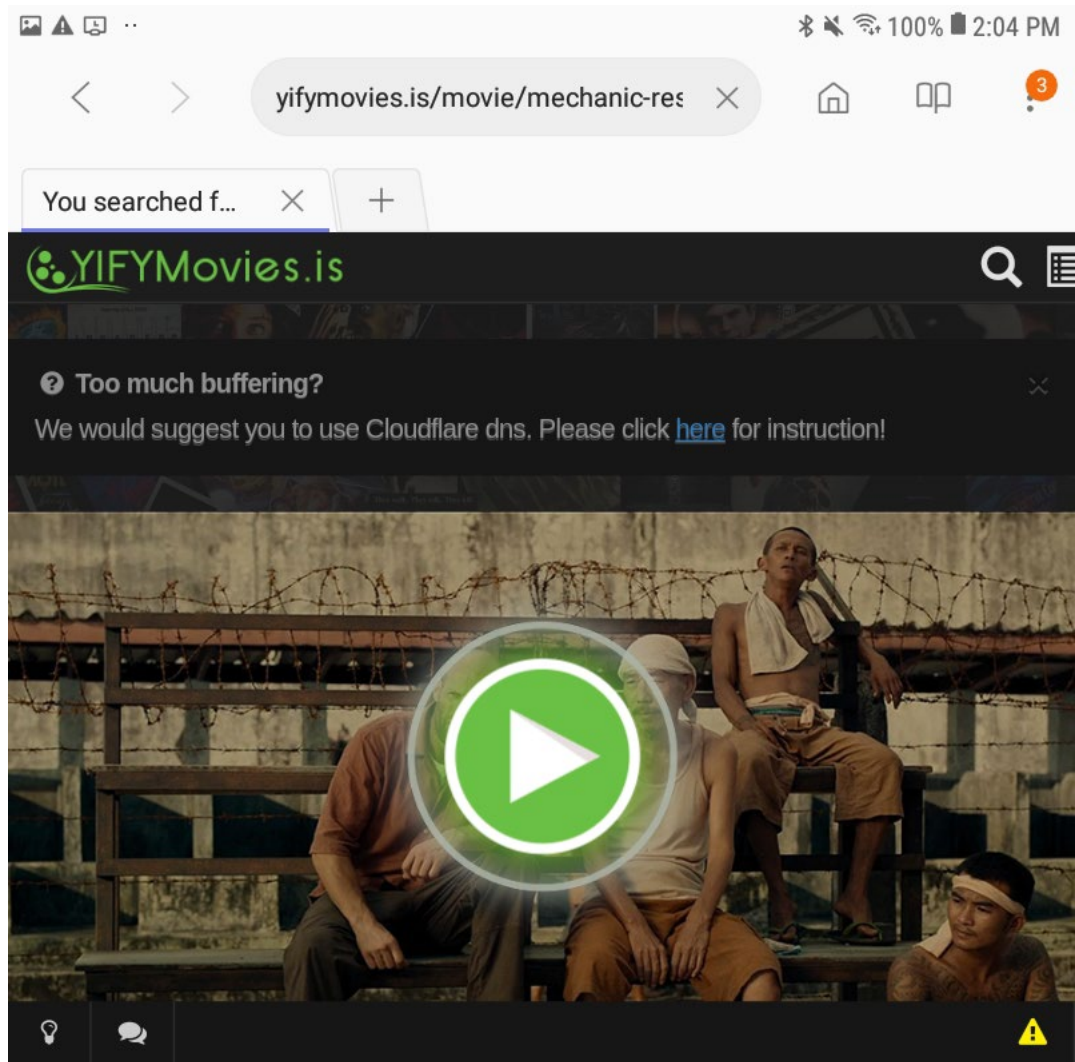
16.



17.

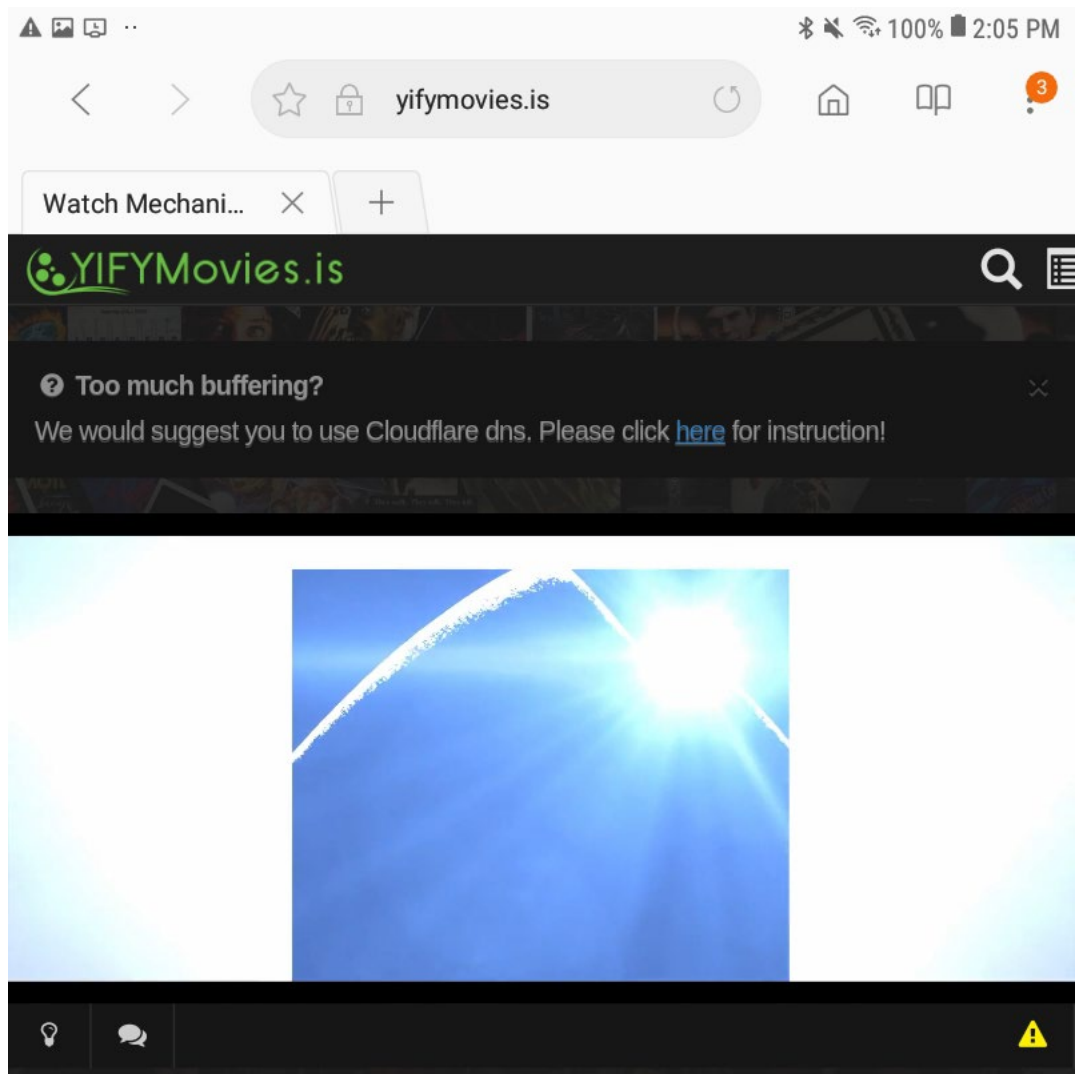
18. I then typed in the search bar the title “Mechanic Resurrection”. A page was automatically produced with a play button.



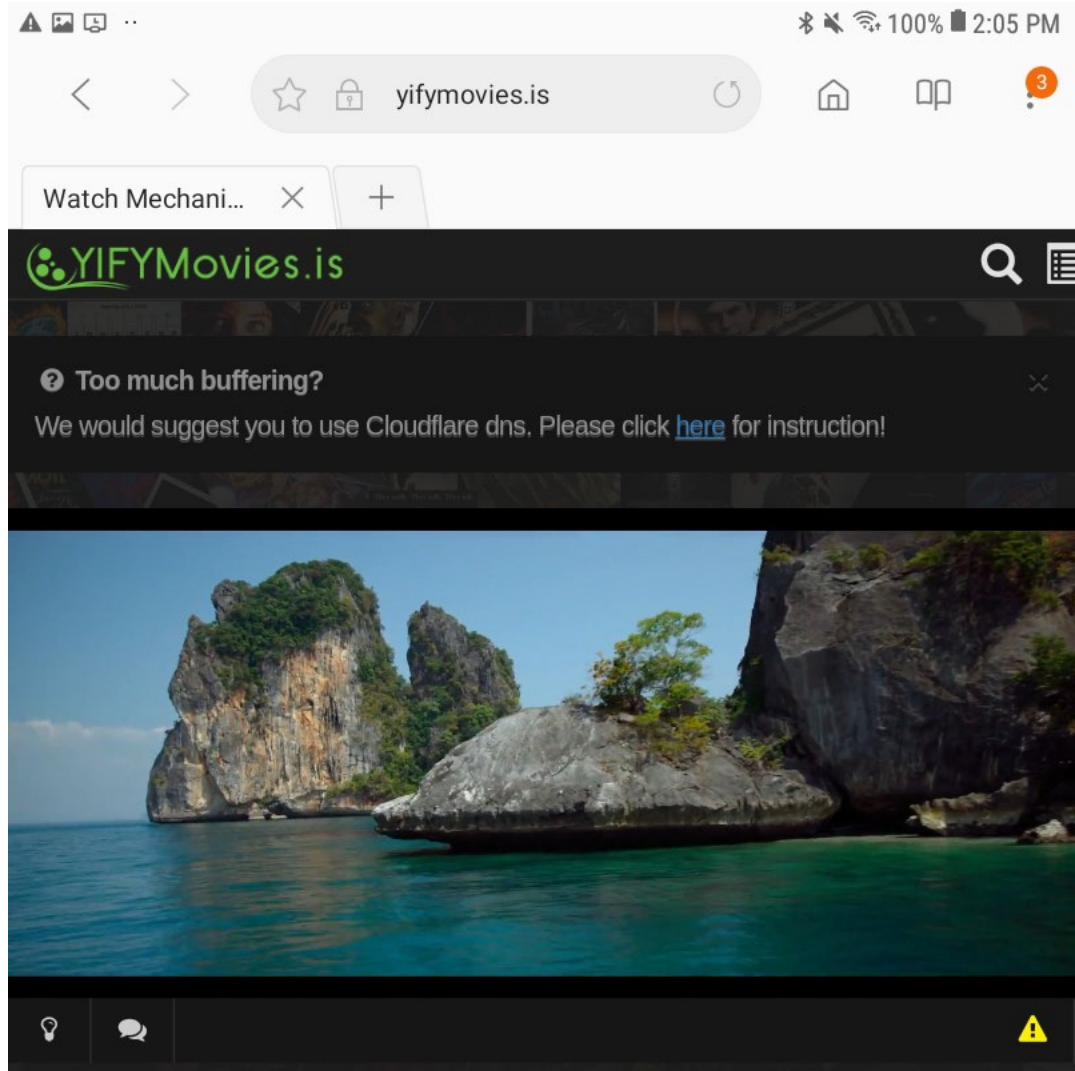


20.

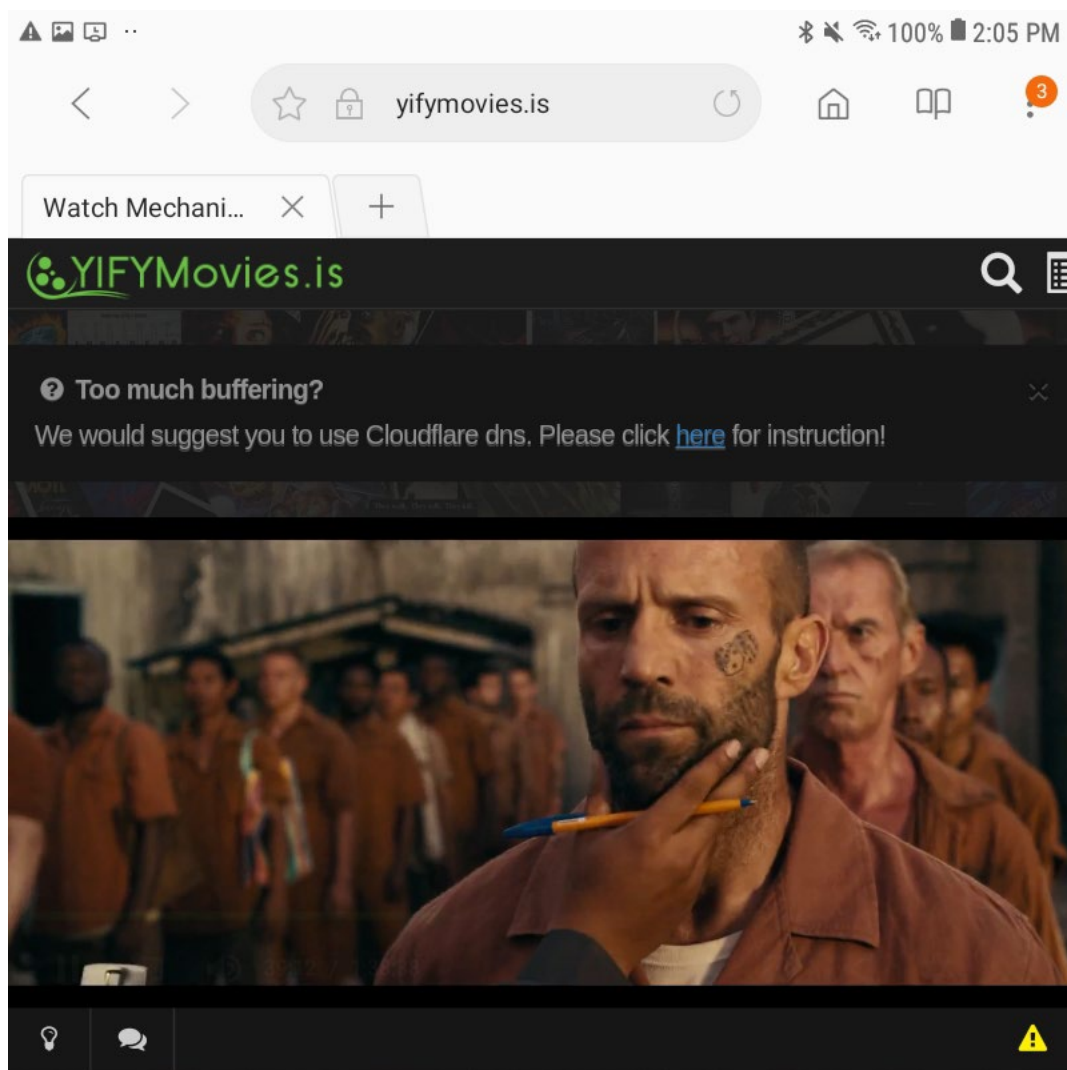
21. I tapped play and the entire presentation of the motion picture *Mechanic Resurrection* was reproduced.



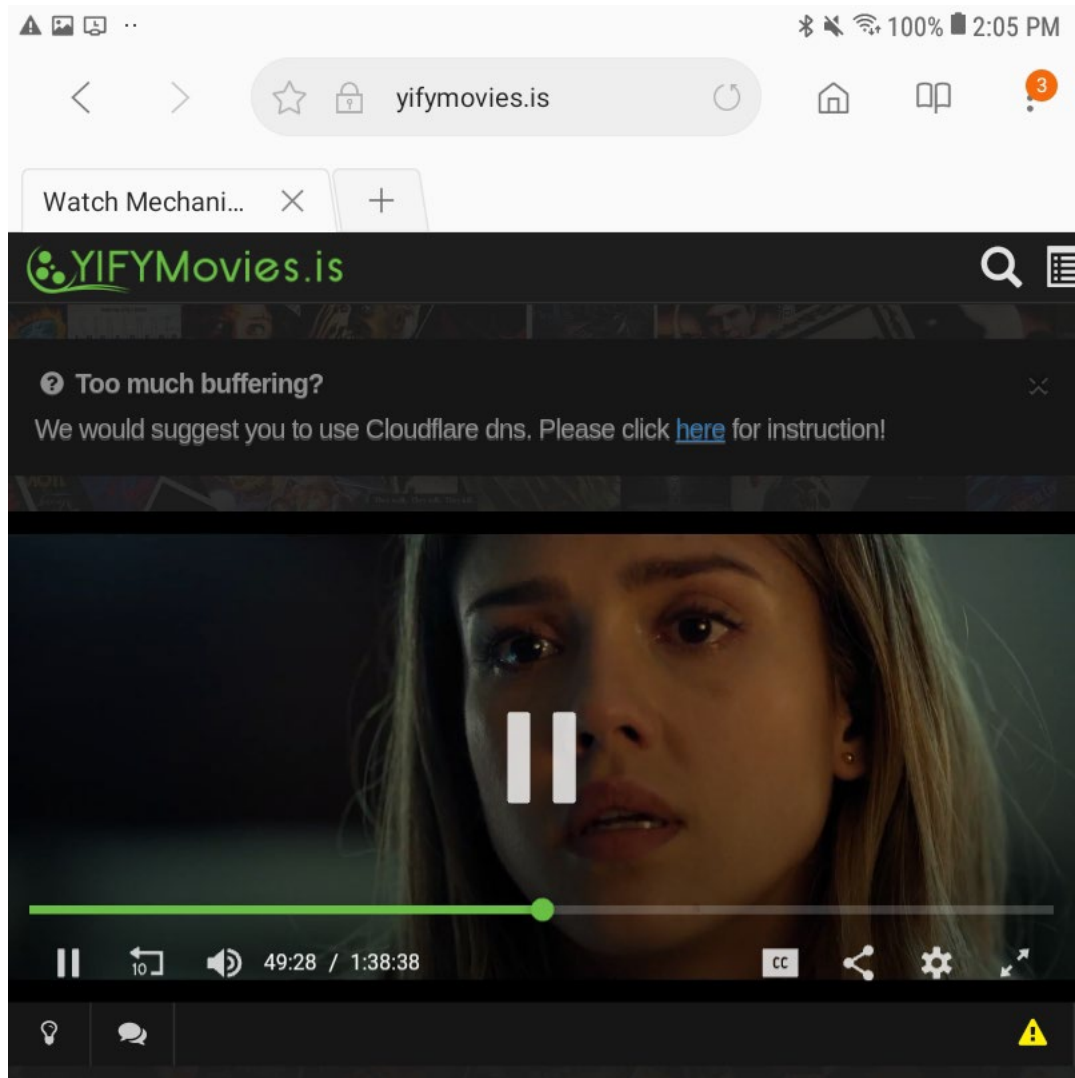
22.



23.

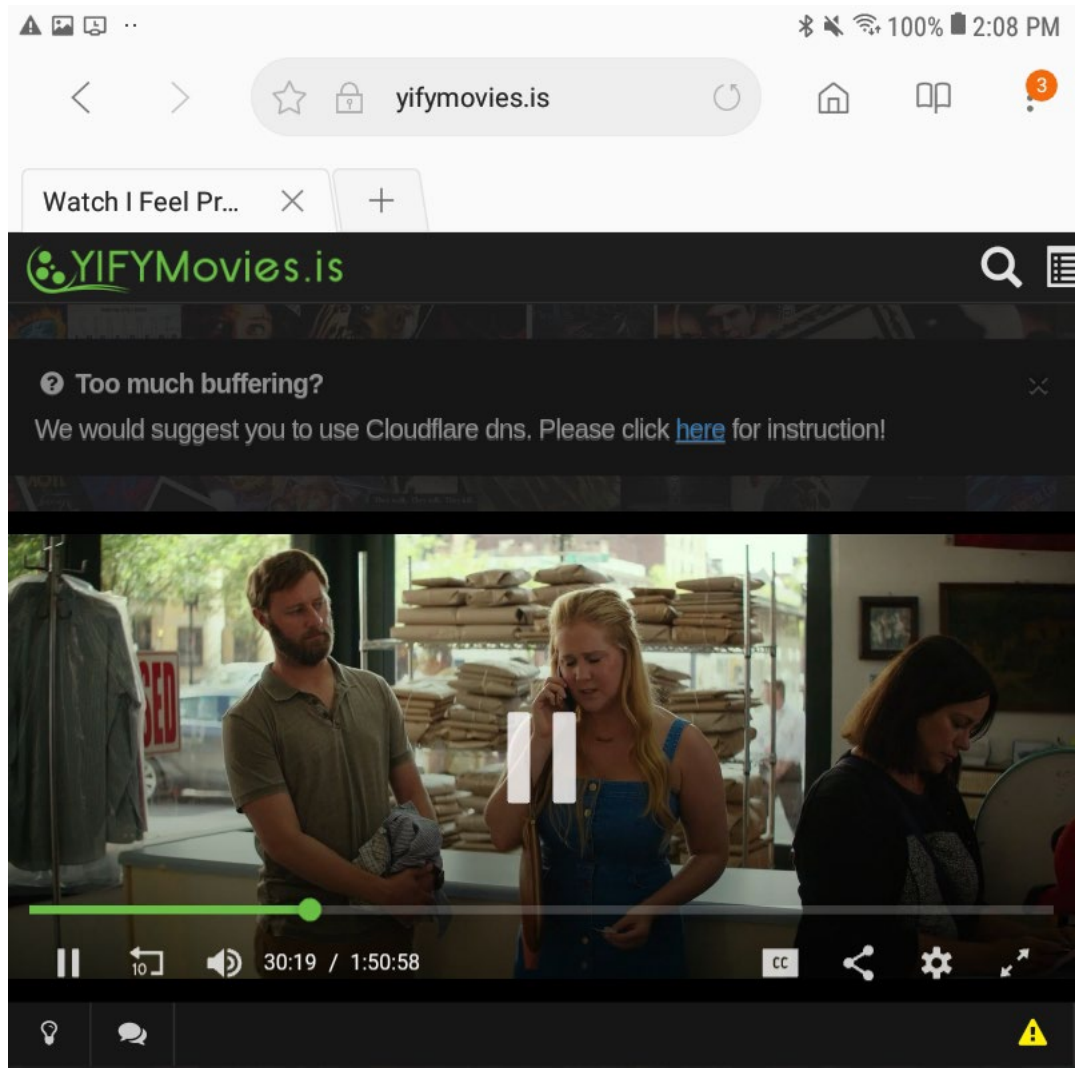


24.

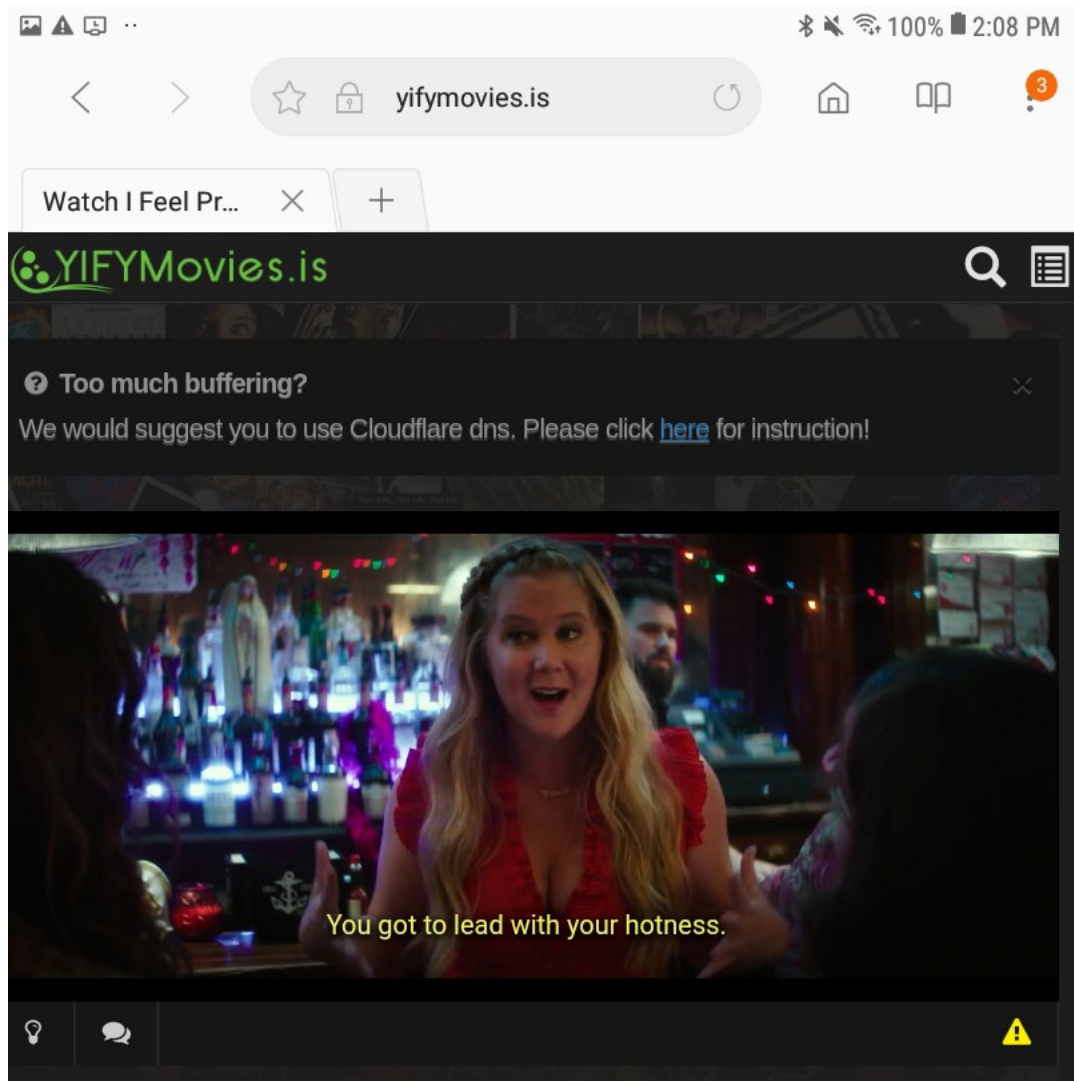


25.

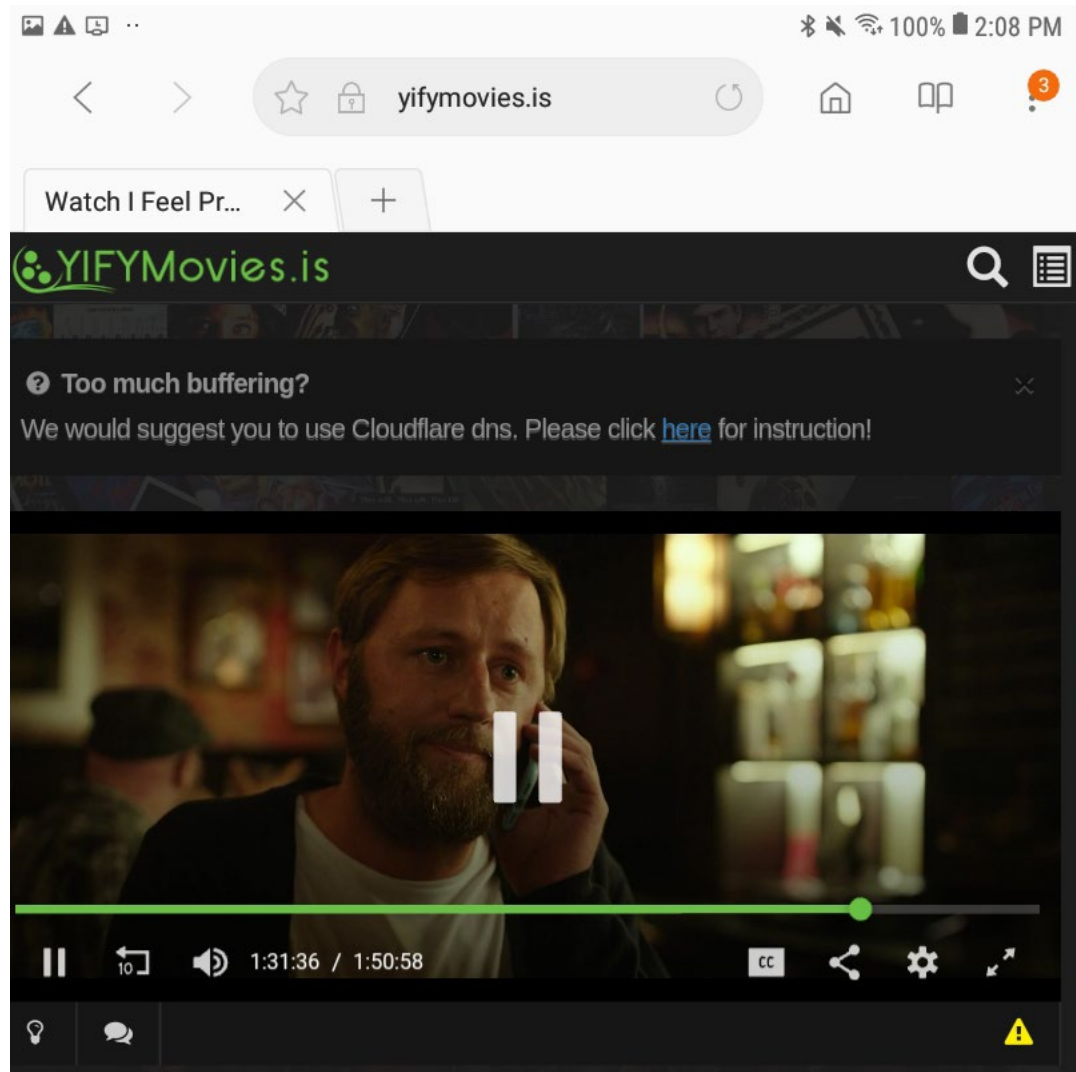
26. I then tapped the search bar and searched for “I Feel Pretty” and was able to reproduce a complete copy of the entire motion picture *I Feel Pretty*.



27.

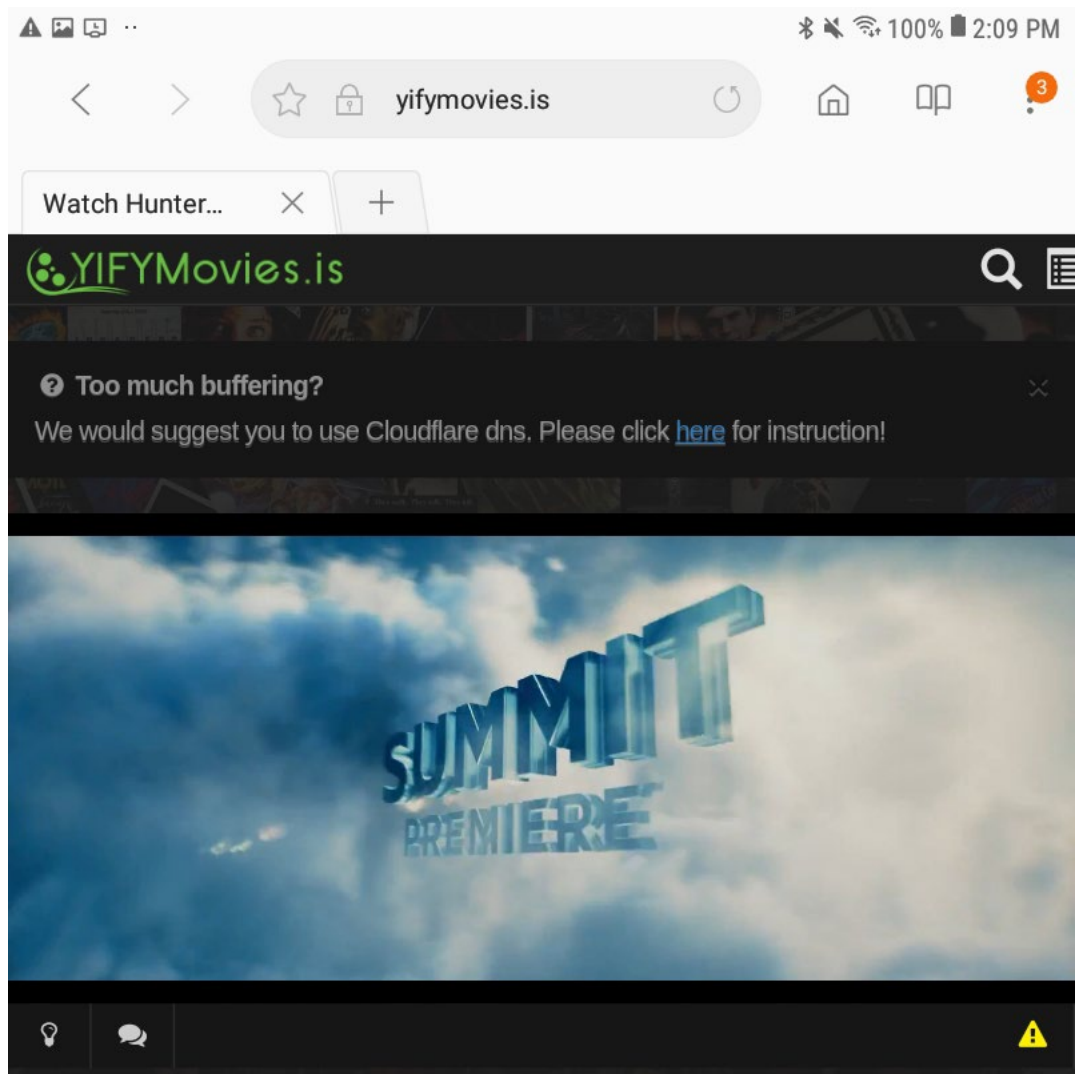


28.



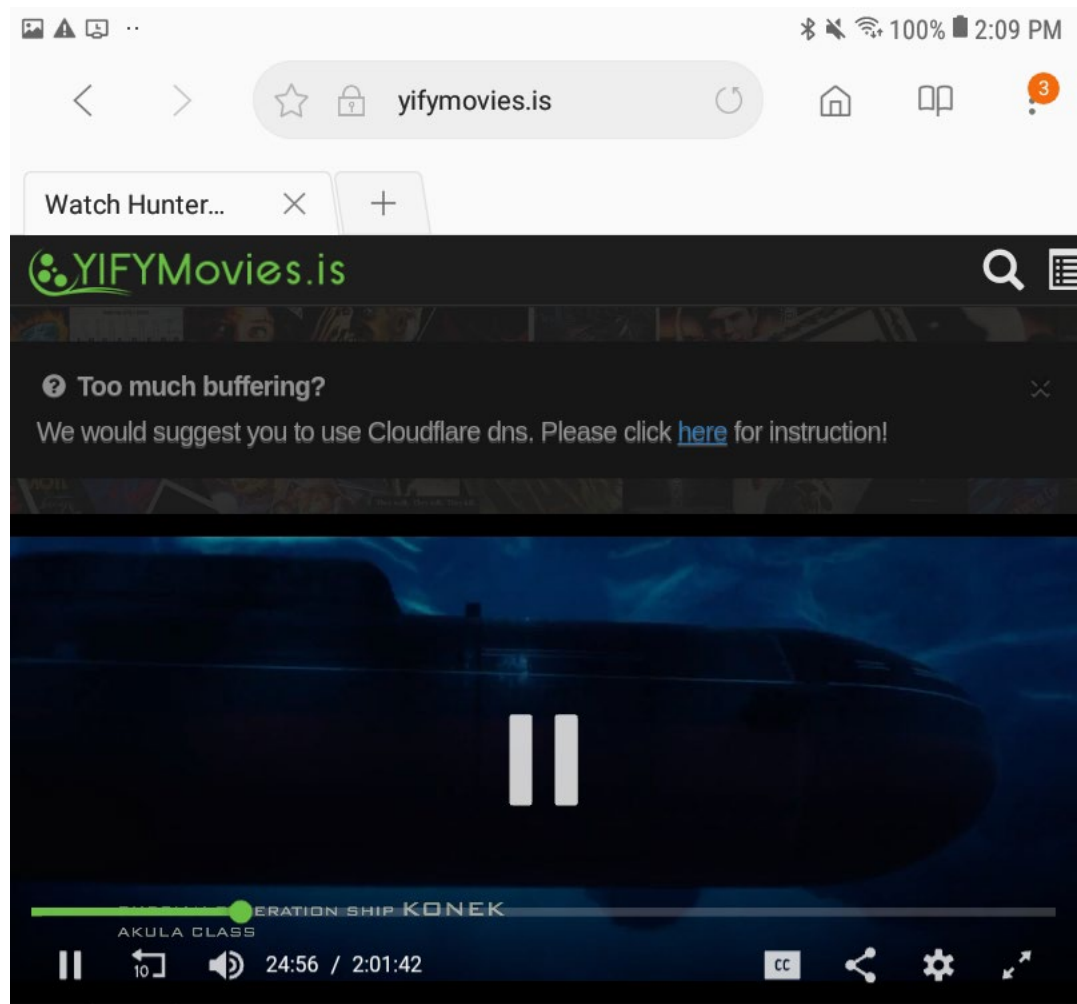
29.

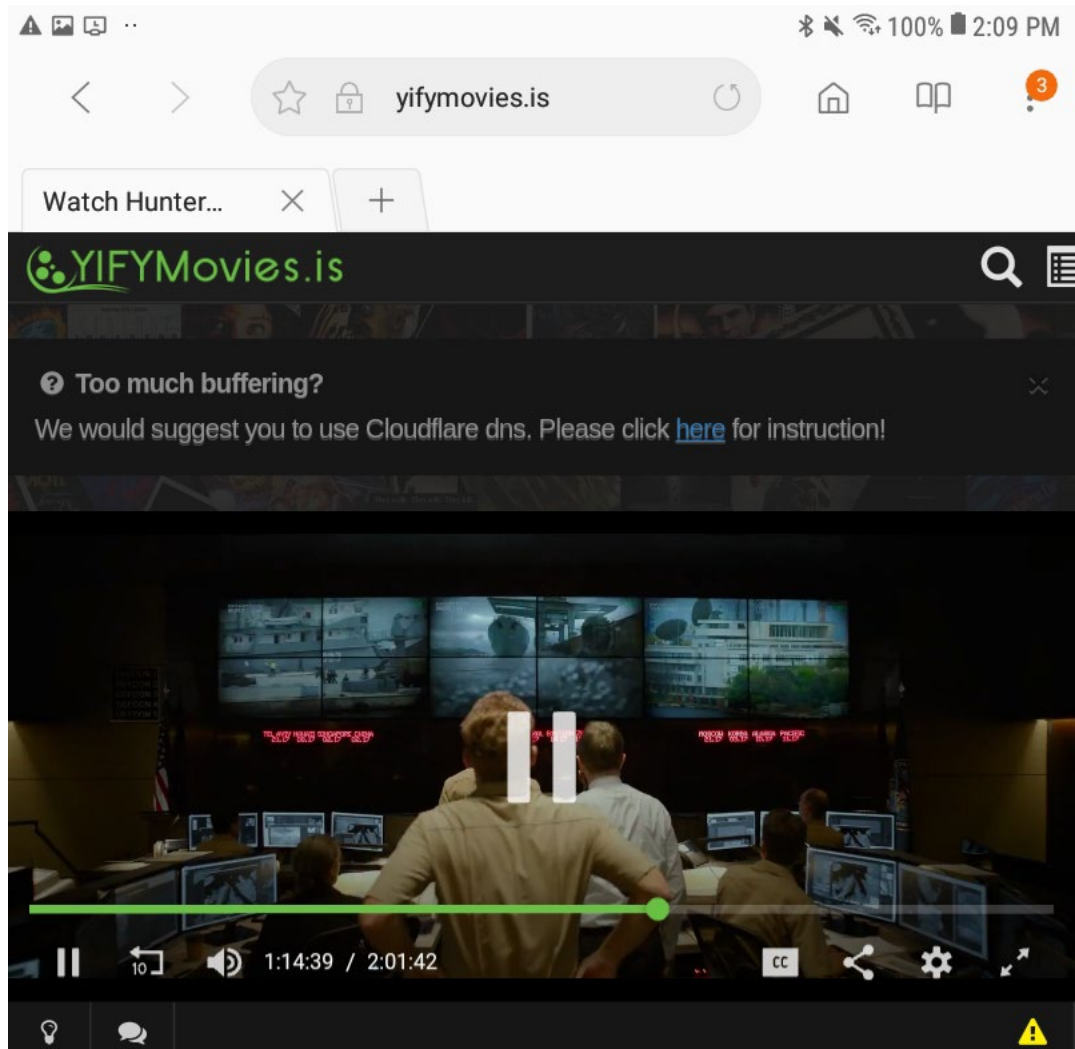
30. I then tapped the search bar and typed “Hunter Killer” and was able to reproduce a complete copy of the entire motion picture *Hunter Killer*.



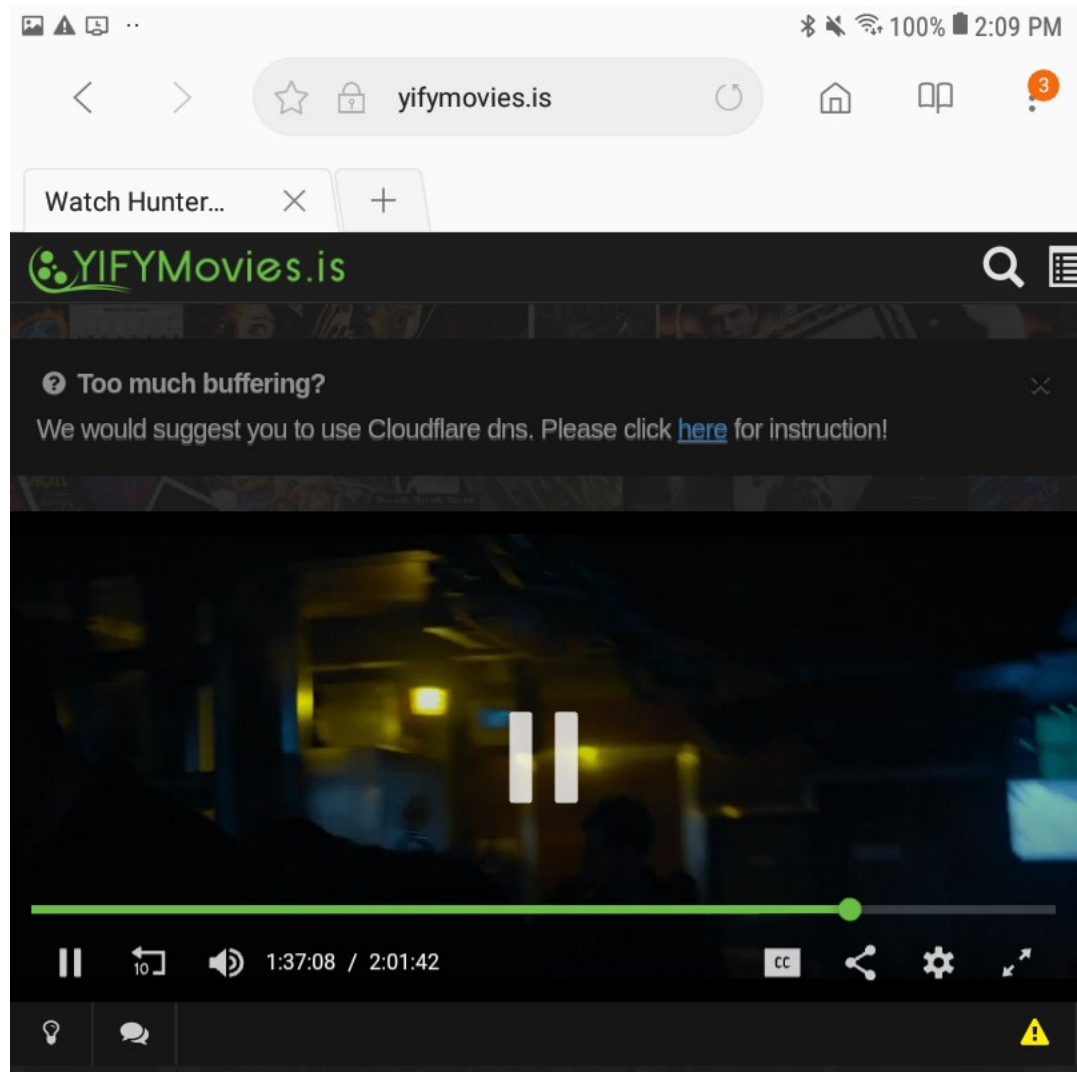
31.

32.

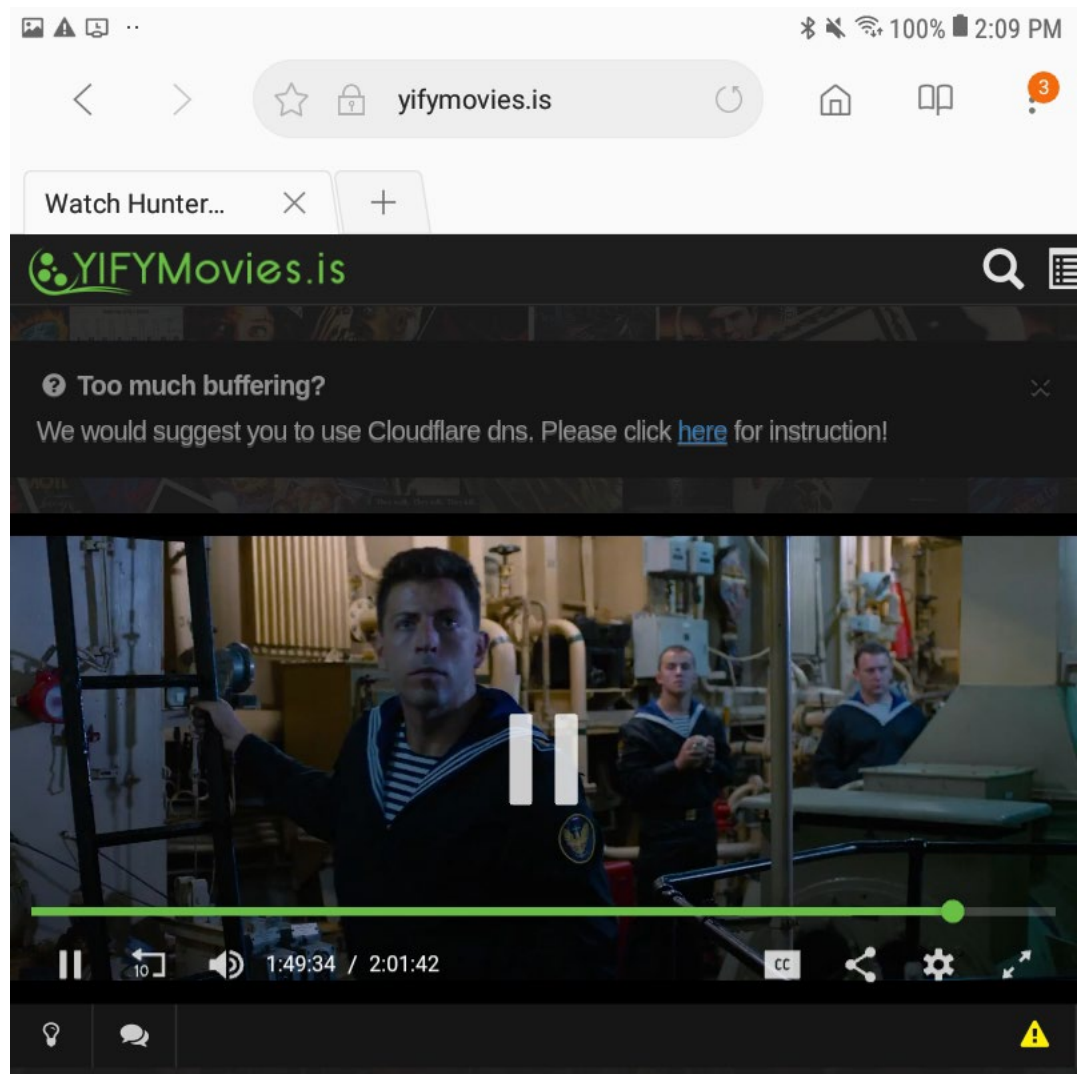




33.

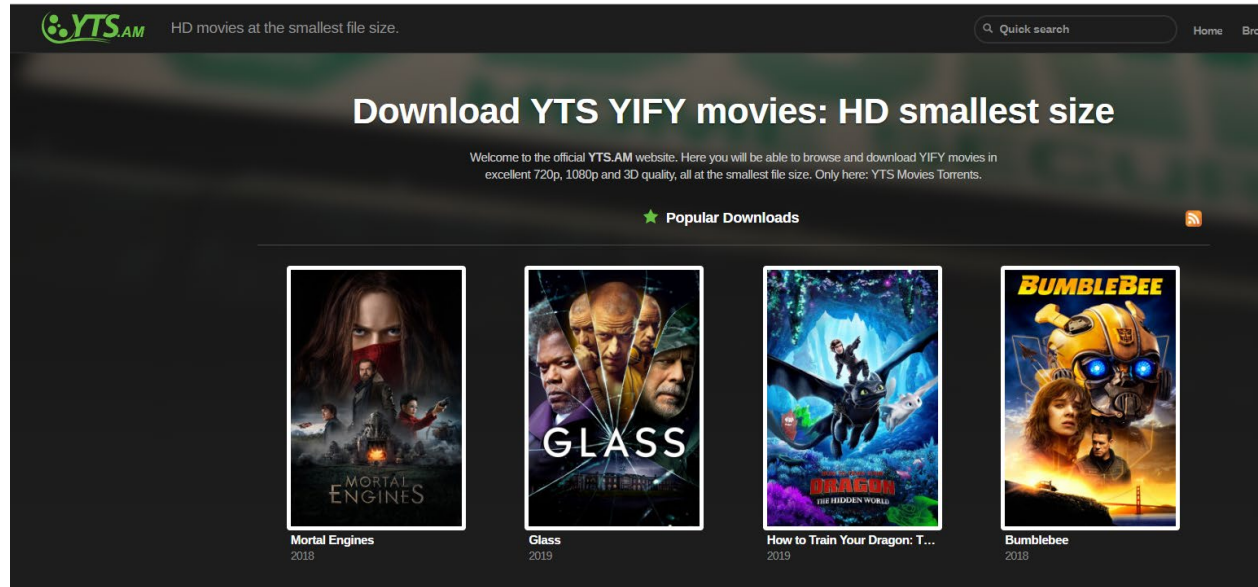


34.



35.

36. The screenshot below is an accurate representation of the website YTS.gg as I viewed it on April 3, 2019.



37.

38. I used the software program Wireshark to record the Internet Protocol (“IP”) addresses acting as server and/or proxy server for the YIFY website and/or streaming sources while investigating the website. The table shown below accurately reflects the IP addresses and times.

No	IP	Source Port	Hit Date UTC-8	
1	104.16.161.13	443	2019-03-29	13:44:25.365
2	169.54.206.44	443	2019-03-29	13:44:26.088
3	151.101.24.64	443	2019-03-29	13:44:26.823
4	31.13.70.7	443	2019-03-29	13:44:26.826
5	172.217.164.99	443	2019-03-29	13:44:27.107

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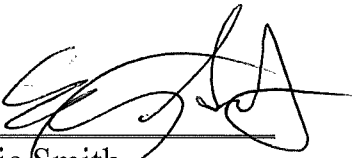
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I declare under penalty of perjury that the foregoing is true and correct.

DATED: Kailua-Kona, Hawaii, April 3, 2019.


Eric Smith