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Cheryl Bawtinheimer*

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Rapid Relief Team (RRT) Ltd.,

Plaintiff and Counterclaim-
Defendant,

vs.

Cheryl Bawtinheimer,

Defendant and Counterclaim-
Plaintiff,

vs.

Brown Rudnick LLP, Katy-Jade Church, and
Michael Graif,

Counterclaim-Defendants.

Case No.: 4:25-cv-10864-JST
JUDGE: Hon. Jon S. Tigar

**DEFENDANT AND COUNTER
CLAIM-PLAINTIFF CHERYL
BAWTINHEIMER'S REPLY IN
SUPPORT OF MOTION FOR A
PRELIMINARY INJUNCTION**

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1 **1.0 INTRODUCTION AND FACTUAL BACKGROUND**

2 **1.1 Welcome to America**

3 Cheryl Bawtinheimer’s YouTube Channel serves members and escapees from a cult known
4 as the “Exclusive Brethren,” or the Plymouth Brethren Christian Church (the “PBCC”). *See* Exh.
5 3 & 9. Among the Cult’s business empire holdings is the Rapid Relief Team (“RRT”), which is
6 identified by its trademark, a clip art bird (the “RRT Logo”) (ECF No. 31 at 8).

7 RRT is a foreign entity which wants to silence a foreign critic. But RRT chose to do that
8 on American soil. We now have the privilege of showing RRT our “*profound national*
9 *commitment to the principle that debate on public issues should be uninhibited, robust, and wide-*
10 *open.*”¹ RRT gets to learn about the First Amendment.

11 Why did RRT choose to settle its score with Ms. Bawtinheimer in the United States? Was
12 it the perception of higher damages awards for plaintiffs? Statutory damages? Perhaps it was a
13 perfunctory knowledge of the “American rule” where the parties presumptively pay their own
14 fees.² Clearly, they felt that there was some advantage. And perhaps there is, if you only look as
15 far as statutory damages awards, or the perception that the party with the most money is at an
16 advantage in our courts. This was a miscalculation. Those things may be true, and we have strong
17 protections for intellectual property in the United States, but they are reined in by fair use. Section
18 107 of our copyright act is a full-throated eagle’s scream that the First Amendment does not
19 abandon anyone at the altar of copyright claims. And if you hire mercenaries to abuse someone
20 on our soil, that victim of your actions will have the full protections of our laws, and those
21 mercenaries will themselves be held to account.

22 Ms. Bawtinheimer may not enjoy the First Amendment in Canada. The Australian plaintiff
23 may be surprised at what our commitment to free speech means. But our guests will go home from
24 this dispute to tell their friends what the majesty of our Constitution and our commitment to wide
25 open and robust debate is all about. We protect civil liberties for citizens and visitors alike.

26 _____
¹ *New York Times v. Sullivan*, 376 US 254, 270 (1964) .

27 ² But *see* 17 U.S.C. § 505.

1.2 Factual Background

The RRT's parent, the Exclusive Brethren, has a long history of censoring critics. In fact, it has a history of misusing copyright law to do so. *See, e.g.,* Laura Dyason & Bernard Doherty, *The Modern Hydra: The Exclusive Brethren's Online Critics: A Case Study of Cult Awareness Activism and Community Formation in Cyberspace*, 233 ST. MARK'S REV. 116, 124 (2015), attached as **Exhibit 1**,³ ECF Nos. 26-24, 26-25, and 26-27. This case is part of its pattern and practice. And Bawtinheimer's podcast is part of the resistance against PBCC and its campaign to censor critics and terrorize those who leave the cult. *See* **Exhibit 2**, Declaration of Cheryl Bawtinheimer ("Reply Dec.") at ¶¶ 8-9; **Exhibit 3**. RRT started by abusing the DMCA process issuing clearly bad faith takedown requests. Ms. Bawtinheimer issued counter notifications. RRT doubled down and sued Ms. Bawtinheimer, and now they face counterclaims and a neutral court that should have no difficulty evaluating the clear fair use here and protecting her speech.

2.0 THE LEGAL AND FACTUAL ISSUES ON REPLY

2.1 YouTube's Copyright Policy and Its Effects

Trying to avoid an injunction, RRT makes a false claim that YouTube's DMCA policy is an independent adjudication of fair use, and that *YouTube* somehow adjudicated the copyright dispute. ECF No. 31 at 9-10 ("YouTube, not RRT, concluded that the videos should be taken down"). RRT, its counsel, and anyone who has ever used the Internet, knows that all YouTube does is review DMCA notices for technical requirements like the signatory swearing under penalty of perjury that the use is infringing. YouTube does not make independent fair use determinations. *See* "Fair use on YouTube," attached as **Exhibit 4**.⁴ YouTube is not a copyright arbitration service. If the DMCA notice looks like a valid notice, YouTube removes the content, presuming that the person sending the DMCA notice under penalty of perjury was telling the truth. If Counterclaim-Defendants want to play it that way, then YouTube replaced the content when Bawtinheimer issued

³ Available at: https://www.academia.edu/23637750/The_modern_Hydra_the_Exclusive_Brethren_online_critics_A_case_study_of_cult_awareness_activism_and_community_formation_in_cyberspace.

⁴ Available at: <https://support.google.com/youtube/answer/9783148?hl=en>.

1 a counter-notification claiming fair use. Does RRT concede that this “independent arbitration”
2 established fair use?⁵ Of course not, but there is *little* consistency in the opposition.

3 What YouTube *does* do is decide who is a “repeat infringer,” basing this entirely on how
4 many DMCA notices it has to process. See Laura Edelson, “Content Moderation in Practice,” 3 J.
5 FREE SPEECH L. 183, 188 (2023) (citing to YouTube guidelines at <https://perma.cc/6WPD-B2R3>
6 and at <https://perma.cc/Y6DC-FZHN>.) After YouTube receives a DMCA notice, the user gets a
7 warning. *Id.* After three strikes in a 90-day period YouTube shuts down the user’s channel. *Id.*
8 If that happens, users lose the ability to have another channel and lose all of their content. *Id.*

9 YouTube’s Strike System is frequently weaponized by would-be censors, especially since
10 it is difficult to visit any consequences upon an abusive party for dishonest DMCA notices.⁶
11 Meanwhile, even a single copyright strike is damaging. Even one strike prevents a creator from
12 live-streaming for a week. YouTube, Understand Copyright Strikes, attached as **Exhibit 5**.⁷

13 Abusive Copyright strikes are not a mere inconvenience; they are an existential threat.
14 Because of RRT’s DMCA abuse, Bawtinheimer is sitting at the 2-strike threshold. Reply Dec. at
15 ¶¶ 10-11; **Exhibit 6**. One more strike and she will lose her channel. Bawtinheimer will not be able
16 to re-upload her videos on YouTube, not even on a new channel. She will lose the following she
17 has accumulated over the years, destroying her goodwill among viewers. Reply Dec. at ¶¶ 12-13.
18 And just as bad, those who depend on her channel, both inside and banished from the Exclusive
19 Brethren cult will lose their access to this information and support. *Id.* at ¶¶ 6-7.

20 RRT claims to offer an alternative, that Bawtinheimer simply upload new versions of the
21 complained-of videos with the RRT Logo removed. They claim that Bawtinheimer has
22 “voluntarily decided to create this controversy by refusing to edit her videos to remove the
23 infringing material . . .” ECF No. 31 at 17. That logic is busted. Bawtinheimer made five videos
24 that she had every right to make. RRT decided that it did not like them. Well then, Sheriff Sullivan

25 _____
26 ⁵ The videos came back down after this lawsuit was filed, pursuant to YouTube’s policies, so they
27 are down again, and Ms. Bawtinheimer must seek this Court’s assistance to restore them.

⁶ The only recourse is a lawsuit under 17 U.S.C. § 512(f).

⁷ Available at: <https://support.google.com/youtube/answer/2814000>.

1 only wanted *a few edits* to “Heed Their Rising Voices” in *New York Times v. Sullivan*, 376 U.S.
2 254 (1964). But the New York Times “created a controversy” by not letting Sherriff Sullivan edit
3 their newspaper. Larry Flynt could have just let Jerry Falwell edit *Hustler Magazine* but he “created”
4 a controversy. *Hustler Magazine, Inc. v. Falwell*, 485 U.S. 46 (1988). By that logic, why have
5 free speech cases at all, if you just wrongly “create controversy” by refusing to give in to censors?

6 RRT chose, and chooses, conflict here. RRT can moot this motion by withdrawing the
7 DMCA notices, without prejudice to its rights to adjudicate this dispute.⁸ If RRT really is
8 confident that the videos are infringing, it has an active copyright infringement suit pending. It
9 can continue to press for adjudication here. And if their infringement theory turns out to be correct,
10 money can compensate them for copyright infringement. It cannot compensate Bawtinheimer or
11 her community for the censorship that RRT got without the slightest bit of judicial review.

12 RRT’s position is not just morally and legally invalid, but it is a false offer. Even if
13 Bawtinheimer put up the *exact same videos again unmolested*, it would not cure the existing strikes.
14 Further, the information suppressed by the DMCA notices is *not just what we find in the videos*
15 *themselves*. Each video had backlinks from across the internet leading to them, user views, which
16 matter for page ranking, and significant engagement in the comments. All of this is lost even if
17 RRT says “go ahead and put them back up.” Bawtinheimer needs the precise videos restored.
18 Reply Dec. at ¶¶ 14-15. What RRT took away cannot be replaced with edited videos, even if the
19 suggestion to “just let the subject of your criticism edit your content” were valid.

20 **2.2 Injunctive Relief is Available Threefold**

21 Counterclaim-Defendants argue that 17 U.S.C. § 512(f) does not provide for injunctive
22 relief. Why they bother with this argument is unclear. If we get to relying on 512(f), something
23 has gone woefully wrong. Bawtinheimer has a right to injunctive relief as a mere defendant
24 without counterclaims, as Fed. R. Civ. P. 65 does not premise a preliminary injunction on a claim.

25
26 ⁸ And if RRT does so, Bawtinheimer expressly waives any argument that withdrawing the DMCA
27 requests is in any way an admission of wrongdoing. This will be a subsequent remedial measure
under FRE 407. Even if it isn’t, Bawtinheimer stipulates that it should be treated as one.

1 She is also entitled to injunctive relief under her declaratory judgment claim. *See Youth 71Five*
 2 *Ministries v. Williams*, 160 F.4th 964 (9th Cir. 2025). Nevertheless, the argument that § 512(f)
 3 does not allow for injunctive relief is false. *See Hollister v. Sims*, 2026 U.S. Dist. LEXIS 47709,
 4 *8-13 (C.D. Cal. Jan. 30, 2026) (preliminary injunction enjoining the sending of future DMCA
 5 takedown notices and requiring withdrawal of pending DMCA complaints in a 512(f) claim);
 6 *Invisible Narratives v. Next Level Apps Tech.-FZCO*, 2025 U.S. Dist. LEXIS 29888, *8-11, 14-15
 7 (N.D. Cal. 2025) (same). And while Counterclaim-Defendants rely on *Stardock Sys., Inc. v.*
 8 *Reiche*, 2018 U.S. Dist. LEXIS 222971 (N.D. Cal. Dec. 27, 2018), for the proposition that such an
 9 injunction exists, but subject to a heightened standard of proof, the more recent cases make no
 10 mention of such a standard. Counterclaim-Defendants position that injunctive relief cannot issue
 11 doesn't make a bit of sense, and is not even consistently presented by them.

12 **2.3 Bawtinheimer is Likely to Prevail on Her Declaratory Judgment Claim**

13 Bawtinheimer's declaratory judgment claim is solely that her use is fair use. All four of the
 14 fair use factors either favor her or are neutral. If the Court finds that the use of a logo to identify a
 15 company being criticized is fair use, substantial likelihood is established. But, if it does not, then
 16 what does fair use even mean?

17 If RRT's theory prevails, then this district should be a destination for all future censorship
 18 campaigns. If a reporter takes a photo of Donald Trump in front of Mar-a-Lago, and the Mar-a-
 19 Lago logo gets into the picture (and Trump doesn't like the content): Presto! DMCA. No fair use!
 20 Imagine if RRT's theory were in place when reporters wrote about Jeffrey Epstein: You can't use
 21 his photo to identify him. News reports about Enron would have required a license from Enron's
 22 logo designer. Bawtinheimer is not only likely to prevail, but this Court would need to reinvent
 23 copyright law and the First Amendment in order to deny relief.

24 **2.3.1 The Purpose and Character of the Use is Classic Fair Use**

25 The waters of Silfra are not as clear as this fair use.

26 RRT argues that RRT uses its logo to identify itself, so it is not fair use for Bawtinheimer
 27 to use the RRT logo to identify RRT, because that's the same way that RRT uses its logo.

1 The Court has the videos. ECF Nos. 26-15 to 26-16, 26-20 to 26-22, and Bawtinheimer
2 presumes (and prays) that the Court watch them before the hearing. One need do little more than
3 that to answer the question presented. Each use of the RRT Logo is in the context of someone
4 commenting on RRT and its website, where the logo is displayed. Criminals walking out of court
5 who do not want to be on the news should just wear a shirt with a logo on it. All the news cameras
6 would need to fold up, because the perp is wearing an original design.

7 Just as it is necessary and expected to use a person's photo when commenting on or
8 criticizing them (*see Dhillon v. Doe*, 2014 U.S. Dist. LEXIS 24676, *14-15 (N.D. Cal. Feb. 25,
9 2014); *Hannley v. Mann*, 2023 U.S. Dist. LEXIS 40022, *13-14 (C.D. Cal. Mar. 8, 2023); *Katz v.*
10 *Chevaldina*, 2014 U.S. Dist. LEXIS 88085, *18-19 (S.D. Fla. June 17, 2014), it is necessary and
11 expected to use a company's logo when reporting on that company. Counterclaim-Defendants
12 make no effort to explain why their persona/logo is special or different. It isn't.

13 Counterclaim-Defendants rely on *Andy Warhol Found. For the Visual Arts, Inc. v.*
14 *Goldsmith*, 598 U.S. 508 (2023). *Warhol* supports the fair use argument. Andy Warhol used the
15 Campbell's soup logo in paintings was for "an artistic commentary on consumerism, a purpose
16 that is orthogonal to advertising soup." 598 U.S. at 539. He wasn't even commenting on
17 Campbell's soup, nor its logo, but on "consumerism." That is not as clear fair use as what we have
18 here. RRT uses its logo to advertise its services. Bawtinheimer used the logo to talk about RRT.
19 Counterclaim-Defendants then refer to *separate* Warhol works depicting Prince, but ignore that
20 the Court found those Warhol uses were not fair because they were simply the same thing –
21 depicting Prince in an artistic rendition. *Warhol* does nothing to support RRT.

22 News coverage almost always displays logos when discussing the subject of a story. A
23 news station recently published a video interview with Bawtinheimer about this lawsuit. 10 News,
24 "'They Tried to Silence Me': Survivor Exposes Allegations Against Aussie Church | 10 News+,"
25 YouTube (Apr. 13, 2026), attached as **Exhibit 7**.⁹ Despite providing no commentary or criticism
26

27 ⁹ Available at: <https://www.youtube.com/watch?v=bmFK7mGHfQk&t=2s>.

1 at all about the RRT Logo, 10 News displayed depictions of the Logo at several points during the
2 interview. *See id.* at 0:17-0:20, 0:24-0:31, 2:15-2:33, 2:55-2:59, and 3:49-4:00.¹⁰

3 Brown Rudnick understands the concept of using a company's logo when discussing that
4 company. *See* B&R blog posts displaying NCAA logo,¹¹ UniCredit logo,¹² and Alaska Airlines
5 logo, **Exhibit 8**.¹³ Are they violating the designers' copyrights? Of course not.

6 Counterclaim-Defendants emphasize the allegedly commercial use of the RRT Logo,
7 because Bawtinheimer's videos were monetized to the tune of *tens* of dollars. The fact that
8 commentary is monetized is irrelevant. *See Campbell v. Acuff-Rose Music, Inc.*, 510 U.S. 569, 579,
9 584 (1994) (observing that "news reporting, comment, criticism, teaching, scholarship, and
10 research . . . 'are generally conducted for profit in this country'"). RRT expects us to accept that
11 the song in *Campbell v. Acuff-Rose* was not actually fair use because 2 Live Crew didn't give it
12 away for free? Is fair use in journalism only permitted if the content is given away on a leaflet for
13 free, with no advertisements? Are Brown and Rudnick's blog posts not for advertising purposes,
14 including trying to convince the public of their expertise in *inter alia* copyright law?

15 **2.3.2 The Copyrighted Work is Informational**

16 RRT admits that its Logo serves an informational purpose, to identify RRT's goods and
17 services. ECF No. 31 at 6, 25. Just as a person's headshot used to identify them is informational
18 (*see Dhillon*, 2014 U.S. Dist. LEXIS 24676 at *15), a corporate logo used to identify that
19 corporation is informational. This nominative purpose of the logo weighs in Bawtinheimer's favor.

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23 ¹⁰ In fact, when one sees just how much and how many times they used the logo, it is clear that the
24 producer was mocking RRT's position and daring them to take on a well-funded defendant, rather
25 than bullying Ms. Bawtinheimer.

26 ¹¹ (Dec. 10, 2025), available at: <https://briefings.brownrudnick.com/post/102lxfy/athletes-nil-and-the-power-of-owning-your-story>.

27 ¹² (Sept. 23, 2024), available at: <https://briefings.brownrudnick.com/post/102jjz7/my-word-is-my-bond-russian-energy-company-must-arbitrate-against-german-bank-in>.

¹³ (June 19, 2024), available at: <https://briefings.brownrudnick.com/post/102jalo/alaska-airlines-must-pay-to-use-virgin-brand-even-though-it-is-not-using-the-bran>.

2.3.3 The Amount and Substantiality is Irrelevant in this Context

Bawtinheimer’s videos indeed display the entire RRT Logo, while criticizing the very content on RRT’s website alongside which the logo is shown. RRT claims this is “excessive.” Should Bawtinheimer have only shown the wings? The beak? RRT identifies no authority for the proposition that Bawtinheimer was required to redact the Logo. This factor weighs in Bawtinheimer’s favor. *See, e.g., Bouchat v. Baltimore Ravens*, 737 F.3d 932 (4th Cir. 2013).

2.3.4 There is no Effect on the Market for the Original

RRT argues: “Setting the precedent requested by Defendant that anyone may freely use the Logo if they in some way comment upon or criticize RRT would lead to such an adverse result.” (ECF 31 at 27). Yes. Except that precedent is already “set.” Anyone who wants to criticize Mar-a-Lago can use its logo in a story about Mar-a-Lago. Any law firm who wants to comment on Alaska Airlines can use a photo of one of its planes with its copyrighted artwork on the tail. Bloomberg will be able to report on Apple or Tesla, and display their logos during segments on their stock performance or criticizing Elon Musk or Tim Cook or discussing Steve Jobs’ legacy.

Market harm is about *supplanting* the use of the original.

2.4 Bawtinheimer is Likely to Prevail on Her 512(f) Claim

Once the Court concludes that Bawtinheimer’s use is a fair use, the Court need not address the 512(f) claim. Nevertheless, a fulsome response to the Opposition may assist the Court. RRT’s lawyers signed DMCA notices for the purpose of censoring criticism, which is an abuse of the DMCA takedown system. *Online Pol’y Grp. v. Diebold, Inc.*, 337 F. Supp. 2d 1195, 1204-05 (N.D. Cal. 2004) (copyright holders may not wield DMCA takedowns “as a sword to suppress publication of embarrassing content rather than as a shield to protect its intellectual property”).

When the DMCA was being debated, a Senate Report on Section 512(f) explained that it was concerned that material should not be censored without proper justification: “The provisions in the bill balance the need for rapid response to potential infringement with the end-users[’] legitimate interests in not having material removed without recourse.” S. REP. NO. 105-190 at 21 (1998). Therefore, congress sought to discourage DMCA abuse with Section 512(f).

1 Misrepresentations actionable under that section include takedown notices that target fair use
2 because fair use is “wholly authorized by the law.” *Lenz v. Universal Music Corp.*, 815 F.3d 1145,
3 1151 (9th Cir. 2016). Thus, before sending a DMCA notice, the *signatory* must have a “good faith
4 belief” that the law does not authorize the use. *Id.* at 1154-55.

5 Counterclaim-Defendants seem to be under the impression that the standard under 512(f)
6 requires nothing more than a statement that the signatory *considered* fair use, meaning the test is
7 *purely* subjective. And indeed, most cases favor that position. *See generally*, Marc J. Randazza,
8 “*Lenz v. Universal: A Call to Reform Section 512(f) of the DMCA and to Strengthen Fair Use*,”
9 18 VANDERBILT J. OF ENT. AND TECH. L. 743 (2020), which Counterclaim-Defendants cite as if
10 they discovered a confession. The undersigned is well aware of the *Rossi/Lenz* machinery and
11 how much censorship it has licensed. It must have *some* limit.

12 Despite the density of the *Rossi/Lenz* standard, the 512(f) claims here are strong. To date,
13 512(f) cases focused on copyright *owners* sending DMCA notices – not *experienced copyright*
14 *counsel* signing the DMCA notice. This case may have *Rossi/Lenz* genetic material, but it is a
15 separate species. In *Rossi*, the Defendant advertised that his website contained piracy. *Rossi v.*
16 *Motion Picture Ass’n of Am., Inc.*, 391 F.3d 1000, 1002 (9th Cir. 2004). He was lying, but one
17 cannot blame the signatory of the DMCA notice for taking *Rossi* at his word. And in *Lenz*, the
18 notices were signed by Sean Johnson, an assistant in Universal Music’s legal department. Sean
19 was not legally trained and was due some grace as someone uneducated on copyright law.
20 Experienced and top price copyright lawyers who sign that DMCA notice under penalty of perjury
21 should be held to a different standard of knowledge and “consideration” than Sean.

22 If the term “good faith” is not mere surplusage in the statute, it should at least mean that
23 there is a point at which that DMCA notice could only be issued with falsity, willful blindness, or
24 reckless disregard. *Rossi* may have licensed being too lazy to click on a link to confirm whether
25 there is infringement there. And *Lenz* may have given grace to a legal assistant who gets a little
26 too caught up in his job. But would *Rossi/Lenz* let Mel Nimmer, Mitch Stolz, or Eric Goldman
27 simply state in a DMCA notice that they had “considered” fair use, no matter how obviously they

1 did not?¹⁴ Willful blindness may be used to determine whether a defendant has knowingly
 2 misrepresented that their good faith belief the offending activity was not fair use. *Lenz* at 1155.
 3 *See also Executive Lens LLC v. Rapkin*, 2026 U.S. Dist. LEXIS 58448, at *9-10 (N.D. Cal. Mar.
 4 19, 2026). No reasonable attorney could have believed that the use here was not fair use under
 5 Section 107 unless they were reckless, willfully blind, or they simply failed to consider all four
 6 factors (and considering less than four factors is not “*considering*” fair use). The likelihood of
 7 success on the merits of the 512(f) claim, at least, against Brown Rudnick and its attorneys, is
 8 substantial enough that they can be told by this Court, at this stage, “Don’t do that again.”

9 **2.5 Bawtinheimer Has Shown Irreparable Harm**

10 Counterclaim-Defendants argue that Bawtinheimer has not suffered irreparable harm
 11 because RRT claims it would allow her to repost the videos if she just removed any use of the RRT
 12 Logo. Bawtinheimer does not petulantly say “I should not have to” - although that *is* enough. As
 13 discussed in Sect. 2.1, *supra*, the strikes and disablement of the videos are creating irreparable
 14 harm that can only be cured by lifting the take down notice. It cannot be remedied by reposting
 15 the same video again, with or without the logo. Her irreparable harm can only be remediated by
 16 reinstating the original videos, at the original URLs, with the original likes and comments.

17 Reposting the videos anew, even if they were not subject to RRT editorial control, would
 18 do nothing to recover the algorithmic value of the former videos, resulting in a loss of followers
 19 on YouTube, associated goodwill, and the community conversation that ensued under them. Reply
 20 Dec. at ¶¶ 13-15. And with new videos come new URLs, meaning that everyone across the Internet
 21 who linked to her original videos will now be linking to dead air. *Id.* The “new” videos will
 22 languish, unviewed, and unable to be found without difficulty.

23 Meanwhile, the irreparable harm is also visited upon the broader community. The Get-A-
 24 Life Podcast is a haven for PBCC survivors, many of whom have written to Bawtinheimer to
 25 express how her podcast is a lifeline to them. Reply Dec. at ¶¶ 18-19; letters from Get-A-Life
 26

27 ¹⁴ Not to suggest that they would ever do so.

1 listeners, attached as **Exhibit 9**. All of this will be lost if Bawtinheimer receives three copyright
 2 strikes under YouTube’s policies. Because these substantial injuries are “not accurately
 3 measurable or adequately compensable by money damages, irreparable harm is a natural sequel.”
 4 *Williams v. Lobel Fin. Corp.*, 673 F. Supp. 3d 1101, 1108 (C.D. Cal. 2023); *see also Rent-A-Center,*
 5 *Inc. v. Canyon Television & Appliance Rental, Inc.*, 944 F.2d 597, 603 (9th Cir. 1991) (reputational
 6 harm and loss of goodwill is irreparable harm).

7 *Amaretto Ranch Breedables v. Ozimals, Inc.*, 2010 U.S. Dist. LEXIS 141242 (N.D. Cal.
 8 Dec. 21, 2010), granted the same injunctive relief Bawtinheimer seeks. The Court there enjoined
 9 bogus DMCA notices finding that the plaintiff had “established a likelihood of irreparable harm if
 10 Second Life complies with the DMCA Takedown Notification.” *Id.* at *7. The court noted that a
 11 disruption to the sale of allegedly infringing products during “prime buying season” would likely
 12 cause a permanent loss of customers, thus establishing irreparable harm. *Id.*; *see also Stuhlberg*
 13 *Int’l Sales Co. v. John D. Brush & Co.*, 240 F.3d 832, 841 (9th Cir. 2001) (“Evidence of threatened
 14 loss of prospective customers or goodwill certainly supports a finding of the possibility of
 15 irreparable harm”). Bawtinheimer similarly faces a permanent loss of the audience for whom she
 16 creates her content and that audience is not here for entertainment. This loss would be an especially
 17 dire consequence for the victims of the PBCC whose only lifeline is the Get-A-Life Podcast. Reply
 18 Dec. at ¶ 18; Exh. 3 & 9. With 2 pending copyright strikes due to RRT’s bad-faith DMCA notices,
 19 this potential harm is greater, but it is not just about new strikes. The old videos need restoration.

20 **2.6 The Balance of Hardships Tips in Bawtinheimer’s Favor**

21 If Bawtinheimer’s requested relief is granted, she will continue to comment on PBCC and
 22 the RRT, and to create a home for lost cult members to find support. Reply Dec. at ¶ 19.

23 Lost content hurts Bawtinheimer. Further DMCA notices will result in the termination of
 24 the YouTube channel (Exhibit 5) and thus the loss of not just all Bawtinheimer’s existing videos
 25 but her subscriber base. RRT claims that Bawtinheimer “attempts to concoct a sense of urgency
 26 by speculating, disingenuously, that RRT will issue additional takedowns if she reuploads the
 27 videos without the inclusion of the Logo” - no. Bawtinheimer takes RRT at its word that it will

1 not issue takedown notices unless it can concoct a copyright infringement claim. But
 2 Bawtinheimer has the right to show the Logo, the same as every other news outlet. See Exhibit 7.
 3 And if not the logo, Bawtinheimer regularly posts content that contains RRT and its parent
 4 corporation’s materials for comment and criticism. If this Court wipes away the most obvious fair
 5 use, RRT will not stop there. But we do not need speculation. Bawtinheimer *fully intends to*
 6 *publish new videos with the logo identifying who she is criticizing*. But she cannot do that unless
 7 this Court gives her the relief she seeks. Otherwise, strike three is looming over her head.

8 The burden on RRT is nothing. They merely must withdraw frivolous DMCA notices and
 9 refrain from submitting further notices with unsubstantiated claims of infringement. If they
 10 seriously face any harm from allegedly infringing videos, they can amend their complaint to
 11 include any new videos they want and seek injunctive relief here, in this court, rather than seeking
 12 expedited injunctive relief with DMCA notices.¹⁵

13 2.7 The Injunction Will Serve the Public Interest

14 “The public interest portion of the preliminary injunction test asks, ‘whether there exists
 15 some critical public interest that would be injured by the grant of preliminary relief.’” *Ozimals*,
 16 2010 U.S. Dist. LEXIS 141242 at *8 (quoting *Independent Living Ctr. of So. Cal., Inc. v.*
 17 *Maxwell–Jolly*, 572 F.3d 644, 659 (9th Cir. 2009)). Here, there is no public interest that will be
 18 negatively affected by granting the “no more censorship without judicial review” injunction.

19 In fact, the public has an interest in being able to view legitimately produced Get-A-Life
 20 content, which would be adversely affected if an injunction does not issue and RRT can keep
 21 disabling videos. This is a channel that performs a public service. According to just one of her
 22 listeners, “*As a gay man, leaving was not simply about stepping away from a belief system. It*
 23 *meant trying to rebuild an identity that had been suppressed and shaped by fear for most of my*
 24 _____

25 ¹⁵ Bawtinheimer acknowledges that the court in *Stardock* disagreed with this conceptualization of
 26 the DMCA takedown process. *Stardock* is faulty and relied on an unrealistic view of the automated
 27 nature of YouTube’s DMCA takedown system. But in any event, that case is non-binding and is
 contradicted by more recent cases from this and other federal courts in California. *Invisible*
Narratives, 2025 U.S. Dist. LEXIS 29888; *Sims*, 2026 U.S. Dist. LEXIS 47709.

1 *life. Hearing others speak openly about these experiences helped reduce the shame and confusion*
2 *I had carried for years, and made me realize I was not alone.” **Exhibit 9**, Ben Woodbury email.*
3 *Another said “[t]he MAIN REASON that I am where I am today, still alive, not depressed, not in*
4 *a mental clinic, free, happily still married with my husband, with our two children and a fulfilling*
5 *life, is because of the Get A Life Podcast videos. I didn’t have to end my life end my suffering, I*
6 *was able to gain freedom! These Podcasts saved my life.” *Id.*, MacKinnon email. The public also*
7 *has an interest in knowing that the DMCA process cannot be misused with zero consequences.*
8 *These videos must be allowed to go back online because, as discussed in the initial Motion and in*
9 *the Counterclaim, PBCC members who find themselves outside the walls of that cult find no*
10 *support and are at great risk of mental health complications and even suicide. ECF No. 26 at ¶¶ 4-*
11 *14, 64-68. Meanwhile, what public interest is served by permitting this kind of abuse of the DMCA*
12 *process? Is the public clamoring for content about the PBCC that makes it difficult to identify*
13 *them? The public would only gain from the requested injunction.*

14 **2.8 RRT’s Concerns About a Mandatory Injunction are Fictional**

15 Counterclaim-Defendants argue that Bawtinheimer seeks a mandatory injunction, and thus
16 must satisfy a more demanding standard, showing that “the law and facts clearly favor her position
17” *Garcia v. Google, Inc.*, 786 F.3d 733, 740 (9th Cir. 2015) (en banc). Even if it were true,
18 Bawtinheimer meets the heightened standard.

19 First, the injunction requests (in part) that RRT be prohibited from sending any more
20 DMCA notices or other legal threats regarding the videos at issue or any other clearly non-
21 infringing videos, and to seek approval from this Court before sending any further DMCA notices.
22 RRT seems to just want to forget that this is part of what was requested. If RRT feels that
23 Bawtinheimer does eventually step over the line into copyright infringement, no matter how flimsy
24 the claim, RRT has an open case where it can seek a temporary restraining order.

25 With respect to the injunctive relief requesting that the DMCA notices be withdrawn,
26 RRT’s argument avoids the purpose of a preliminary injunction, which is to restore the status quo
27 ante. “The status quo ante litem refers not simply to any situation before the filing of a lawsuit, but

1 instead to ‘the last *uncontested* status which preceded the pending controversy.’” *GoTo.com, Inc.*
2 *v. Walt Disney Co.*, 202 F.3d 1199, 1210 (9th Cir. 2000) (citations omitted) (emphasis added).

3 The status quo was that Bawtinheimer was operating her YouTube channel free from
4 strikes and being able to exercise editorial control over her own content. The content went down
5 because of RRT, back up because Bawtinheimer filed a counter-notification, and went back down
6 because this complaint was added to the chain. If the Court’s authority of granting RRT a docket
7 number is why the videos are down, the Court certainly can and should use its power to restore the
8 status quo ante, or to at the very least, not permit future DMCA notices without reviewing them.

9 Mandatory injunctions are not simply those that require a party to do an act as opposed to
10 refrain from doing an act. Rather, they are injunctions “that disturb the status quo by ordering
11 affirmative relief” *Johnson v. Kay*, 860 F.2d 529, 541 (2d Cir. 1988). Thinking of injunctions
12 in binary terms leads to easily manipulable semantic games. For example, what is the difference,
13 aside from label, between a prohibitory injunction that prevents a defendant from infringing a
14 plaintiff’s copyright in an image and a mandatory injunction that requires the plaintiff to remove
15 an infringing image from their website? It is much more important to determine what the status
16 quo is and what would disrupt it.

17 Even if the Court were inclined to treat the requested injunction as mandatory, such
18 injunctions are appropriate when “the status quo . . . is exactly what will inflict the irreparable
19 injury upon complainant.” *Hernandez v. Sessions*, 872 F.3d 976, 997 (9th Cir. 2017). As discussed
20 in Section 2.5, *supra*, and in the Motion, the state of Bawtinheimer having her videos removed,
21 strikes stacking up, and her channel losing momentum, traffic, and goodwill is not the status quo
22 that should be reset by the court. Imagine if a burglar broke into your home and stole your
23 manuscript. An injunction demanding that the manuscript be returned would not be offensive to
24 any notion of justice. It appears RRT would argue “but the manuscript in my hands is the status
25 quo,” but that is not how the law works.

2.9 RRT's Timeliness Argument is Unfounded

Counterclaim-Defendants argue that Bawtinheimer waited too long to seek injunctive relief, but this is based on a faulty factual premise – that she should have sought relief the moment RRT started sending DMCA takedown requests. That is wrong, as initially the DMCA notice and counter-notice system was working as intended. At first, YouTube reinstated Bawtinheimer's videos when she submitted counter-notices establishing that her use of the RRT Logo was a fair use. It was not until January 29, 2026, that YouTube stopped reinstating the videos in light of this lawsuit. January 29, 2026, email from YouTube to Bawtinheimer, attached as **Exhibit 10**; Reply Dec. at ¶¶ 19-20. At that point, it was apparent to Bawtinheimer that injunctive relief was necessary. She moved as fast as she could. *Id.* at ¶¶ 21-22. It was not easy for her to find counsel. *Id.* It is an almost miraculous speed that she was able to find a lawyer in a foreign country, with pennies on the dollar in fundraising, to defend her with a full motion for a preliminary injunction all within 65 days.¹⁶

3.0 CONCLUSION

For the foregoing reasons, the Court should require the DMCA notices to be withdrawn, and should require any further DMCA notices to be either withheld or vetted by this Court prior to being issued.

Dated: April 27, 2026.

Respectfully submitted,

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¹⁶ Counterclaim-Defendants also bring up Bawtinheimer's alleged efforts to evade service, all of which occurred in mid-March 2026 or later. But their evidence consists of attempts at informal service and a few attempts at personal service, with no indication of evasion or even that they attempted to comply with the Hague Service Convention. This is a red herring.

Case No. 4:25-cv-10864-JST

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 27, 2026, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully submitted,

/s/ Marc J. Randazza
Marc J. Randazza

RANDAZZA | LEGAL GROUP

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Exhibit 1

Laura Dyason & Bernard Doherty
The Modern Hydra: Case Study

The modern Hydra: the Exclusive Brethren's online critics

A case study of cult awareness activism and community formation in cyberspace

Laura Dyason and Bernard Doherty

The Internet can mobilize participation and group formation in conflicts and social movements, and can be used as a vehicle to enhance struggle and contending in conflict. Because the Internet provides fast and efficient communication and enhances information exchange among potential participants, it can provide an easy basis for people to share information and learn about a conflict, others who are involved and what tactics are useful in the struggle.¹

One notable aspect of contemporary online discussions of religion is the vehement tone adopted by many participants. The general absence of traditional gatekeepers or editorial oversight in online forums has meant

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The modern Hydra: the Exclusive Brethren's online critics

that the discussion of various topics is often unmediated and unrestrained. Perhaps more in the case of already controversial religious groups than with mainstream churches, it is indisputable that a high degree of acrimony in discussions of religion is a marked feature of online discourse. Factors like the comparative novelty of the internet as a communications medium, a relative absence of non-textual social context cues, and the real or perceived anonymity of participants, have combined to make the internet an ideal platform for contemporary religious contestation and the implications of this online discourse have occasionally bled into offline social conflicts.

In this article we conduct a preliminary exploration of how the controversial Christian group, the Plymouth Brethren Christian Church, usually referred to as the Exclusive Brethren, have become the topic of what Swiss scholar of religion Jean-François Mayer has dubbed 'cyberspace propaganda wars.'² We will examine how the offline practices and various ideological perspectives existing within the Cult Awareness Movement (CAM)³ have been transposed into cyberspace through a brief history and analysis of some of the major websites established by former members of the Brethren.

We suggest that these websites function in at least a dual capacity. On the one hand, these sites provide a support network, what Canadian sociologist Lorne Dawson has called 'virtual community',⁴ fostering a public, interactive, enduring, and regulated network for former members to engage in mutual support. On the other hand, these sites provide a platform for a sustained critique of Brethren beliefs and practices, whereby former members of different ideological persuasions can not only vent their frustration regarding what they consider the negative aspects of Brethren practice, but moreover where they can engage in propaganda campaigns against their former coreligionists. We examine this second aspect utilizing the theoretical lens of E-Space propaganda (proposed by Canadian sociologist Douglas E Cowan) to outline some of the major strategies used by these sites.⁵

Taking a controversy online

Since at least the 1960s when a series of newspaper reports began to appear pertaining to the Exclusive Brethren, the group has been the subject of infrequent bursts of media attention, largely due to its strict adherence to the doctrine of separation from what members consider the evil practices of the wider world. Over the period from the 1950s through to the present, the Brethren as a group have displayed a high degree of what sociologists

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call 'sectarian tension'⁶ and have maintained tight communal boundaries between community members and mainstream society, placing strict limitations on the degree to which members can interact socially beyond the Brethren community.

When these boundaries are transgressed by Brethren members this usually results in a member being 'shut up', a disciplinary process whereby their interactions with the wider Brethren community are severely restricted for an indeterminate period of time. If an errant member is considered by elders within their local assembly to be unrepentant, the member is then 'withdrawn from', essentially a form of excommunication which severs their ties with the Brethren community.⁷ Those 'withdrawn from' are subsequently subjected to varying degrees of religious shunning by members in good standing, which often includes immediate family. In cases of what are considered more serious sins (for Brethren those sins outlined in passages like 1 Corinthians 5:11–13), being withdrawn from is an inevitable outcome in order to maintain communal moral purity. Being withdrawn from is never an irreversible condition, but few individuals withdrawn from subsequently return to Brethren fellowship.

This process has severe outcomes, for those withdrawn from, many of whom suffer greatly from the challenges of adapting to the world outside the tight-knit Brethren fellowship with minimal or no social support; but also for family members who remain in fellowship, who are often faced with the dilemma of choosing between their religious adherence—and, more often than not, the only social world they have ever known—and contact with loved ones. While it is difficult to estimate how many families have been affected by this situation, it is widely held that up to 8,000 Brethren left the group over the period 1953–70, with a greater concentration of these being in the northern hemisphere, especially following the so-called 'Aberdeen Controversy' of 1970.⁸

Since Bruce D Hales became worldwide leader of the Brethren in 2002 there have been promising signs of a less rigid approach to separation, with the leadership openly acknowledging that some past disciplinary actions may have lacked procedural fairness, along with some attempts to facilitate minimal contact between separated relatives. However, these approaches, referred to as 'The Review', have been treated with suspicion by many former members and in most instances renewed contact has been short lived. As such, separation continues to be the major source of contention surrounding

The modern Hydra: the Exclusive Brethren's online critics

the group, fuelling criticism and scrutiny of other arguably less controversial aspects of Brethren communal life.⁹

Prior to 2005 the tensions surrounding the effects of the doctrine of separation tended to emerge sporadically as the result of media reports outlining the experience of former members who had been withdrawn from. In certain cases the published memoirs of former Brethren regaled experiences both within the group and after their departure, almost always under contested circumstances and with a significant degree of animosity. This status quo of infrequent exposure, however, changed rapidly in 2005 when the group became the subject of newspaper headlines after a series of high-ranked Brethren members were linked to third-party election advertising donations supporting the incumbent government of Prime Minister John Howard and the conservative electoral campaign of then New Zealand opposition leader, Don Brash. Subsequent investigative reports revealed individual Brethren also engaging in the funding of advertisements in the USA, Sweden, and Canada.

While this situation was heavily reported in the Australian and New Zealand media at the time, one important but largely unexplored aspect of this controversy has been the role played by internet websites critical of the Brethren. Anti-Brethren websites have fostered and maintained a network of predominantly ex-Brethren members in a series of inter-related campaigns aimed at exposing what they feel are the malevolent activities of the group. This ex-member network has also sought to encourage government and regulatory bodies to institute social control measures against the group's activities (e.g. by campaigning to have the group's charitable exemptions and state funding for their schools overturned). Mayer calls these kinds of campaigns 'cyberspace propaganda wars', and notes that 'for those lonely former members who felt they had to confront and expose international movements they had left, the Internet provided them with an unprecedented venue for voicing their complaints and concerns'.¹⁰

The role of the internet in escalating conflict between former members and the Brethren cannot be underestimated. Indeed, the relatively new site of contestation provided by cyberspace has clearly provided a more effective means for countermovement mobilization against the group. As former Brethren member Joy Nason has written in her recently published autobiography:

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In 2000 I heard about a website entirely devoted to matters concerning the Exclusive Brethren. *The first time I visited this site was a pivotal moment for me.* My initial reaction being—who could possibly care? I was wrong. A great many people did care. Their horrifying histories were revealed in stark detail on this site. They were my soul brothers and sisters from another life, their stories were my stories.¹¹

Nason's experience of encountering and engaging with a virtual community of former Brethren is similar to that recounted by numerous others who have found support and a voice on the succession of three websites critical of the Brethren. Beginning in 1997 with former Brethren member Dick Wyman's website, ExclusiveBrethren.net, these websites have emerged at different stages of a wider controversy that has been taking place offline, each generally more elaborate than the last, and each building on subsequent developments and trends in communication technology to facilitate—if not necessarily achieve—a greater reach within cyberspace and to further the basic countermovement tasks of 'information assembly, management, and dissemination'.¹²

The anti-Brethren web: a brief history

The first significant website dealing with the Brethren (ExclusiveBrethren.net) was set up in 1997 by former member Dick Wyman. Wyman had left the group in 1963 at the height of James Taylor Junior's tightening of the group's boundaries. After a short stint in the US Air Force, Wyman moved into computer programming and eventually decided, after over twenty years working in IT, to set up his own website. He chose the theme of the website because he felt that there was insufficient information online regarding the Brethren. Wyman's original site, discussed in some detail by Australian investigative journalist Michael Bachelard, was a relatively low-tech affair, featuring mainly textual resources and web links to other information available online. More importantly, it featured a guestbook that 'allowed former members of the Brethren to make contact with one another, seek out lost members of their families, and to tell their stories'.¹³ A sizable number of former members like Nason chanced upon this site and, according to Wyman, at its peak the website had around 5,000 pages of information and was being updated almost daily.

The modern Hydra: the Exclusive Brethren's online critics

In addition to this Wyman's site also contained documentary material on the Brethren's history and links to other online resources of varying accuracy. As was the case with later websites, Wyman's website also provided a space for comments by various participants on media and academic articles dealing with the Brethren. Wyman vetted most of these comments before posting, however, to remove any overtly offensive material or spelling errors. Wyman described his own purpose in a BBC *Everyman* program in 2003:

The Brethren were deliberately trying to conceal their activities from the general public and I wanted to provide a counter-balance to this secretiveness that the Brethren insist on maintaining about themselves.¹⁴

This said, Wyman noted in the same documentary that his own perspective had become somewhat more 'conciliatory' over time and while some of the material on his website was very negative, Wyman himself remained an earnest and moderate critic. As the Webmaster of the more developed Peebs.net website, Tim Twinam, notes:

[Wyman] was a fatherly man, a very thoughtful man, with an academic kind of approach, who simply started a guestbook. And that's what took off, he was searching for himself, asking 'What am I, what's my background?' And he was creating an online story and allowing other people to put theirs up, too.¹⁵

While a modest enterprise, Wyman's site provided a preliminary platform for giving voice to an assemblage of participants in what Canadian sociologist Susan Palmer has dubbed the 'equalization of perspectives' offered by the internet.¹⁶ Writing in regard to similar sites which appeared during this period, Palmer notes:

Since the late 1990s, the dissident voices of hitherto powerless minorities inside the NRMs [New Religious Movements] can be heard by fellow members and by outsiders. These include second generation members (adults, teens or children), dissident members, ex-members, fringe members of the group, ex-wives, discarded lovers or alleged rape victims of the charismatic leader, and even rival, schismatic prophets.¹⁷

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Prior to Wyman's site, the perspectives of former Brethren members were limited to occasional biographical pieces in newspaper reports and autobiographical memoirs which had limited circulation. With the arrival of Wyman's site, and considerably more so with its successor, Peebs.net, former members became able to tell their stories en masse, and utilize this new communication platform to reconnect with former friends and estranged family members who had also left. As Bachelard perceptively summarized:

This was in the early days of community activism on the internet, well before social-networking sites began, but members of this unique and traumatised community eventually found Wyman's site and began using it with enthusiasm. For many of them, it was the *first time they had found anybody else who had gone through similar experiences, and the first time they felt that they were not mad or alone.*¹⁸

Despite its popularity with former Brethren, Wyman's site was not without controversy, not least when in October 2000 a disenchanted current member of the Brethren contacted Wyman and began providing internal details about the group to the website, which eventually found their way onto a documentary on BBC's *Everyman* television program. This documentary told the stories of a group of former members as well as featuring interviews with prominent Brethren elders in Britain, an early example of the bridging of controversy between different forms of communications media which has expanded exponentially in recent decades. In early 2004 a defamation suit for copyright infringement, business interference, and other matters was filed by the Brethren's publishing arm, the Bible and Gospel Trust in Minnesota, against both Wyman and Canadian Daniel Little, who, since July 2003, had been primarily responsible for the upkeep of the website's guestbook. Wyman closed the site in February 2004 in response to this, noting that the closure had been for 'personal reasons'.¹⁹ The lawsuit was eventually settled out of court with Wyman being paid \$10,000 and apologizing to the Brethren for any offence caused.

While there was a short-lived site set up by Daniel Little (<http://www.withdrawnfrom.com>), the next phase of this online controversy was instigated by American-based Englishman Tim Twinam, who founded Peebs.net in 2004. Like many of the more active ex-members who have utilized

The modern Hydra: the Exclusive Brethren's online critics

these websites, Twinam's family had been withdrawn from in 1970 when he was aged just 15, after his father had questioned the Brethren leader at the time. As was the case with Nason illustrated above, Twinam noted the importance of Wyman's website in fostering his interest and helping him to come to terms with his unconventional religious upbringing. As journalist Andy Bromage observed in a report on Twinam's later legal problems:

Twinam says he never thought much about his upbringing until, in 1998, he discovered a website, ExclusiveBrethren.net, devoted to reconnecting former followers. The stories Twinam read there—of broken families, shattered lives and people driven to despair—*dredged up long-buried memories*.²⁰

Just as it had been for Nason and Wyman, for Twinam this was a journey of self-discovery, as he told Bromage, 'Suddenly, I discovered why I am who I am ... I started to understand my life, why I'd been a little bit different.'²¹ When Wyman's site was abruptly closed down in early 2004, Twinam contemplated setting up his own, although he was initially hesitant about potential legal actions like those Wyman had encountered. However, when changes in law allowed for the confidential registration of web domains in California, Twinam decided to step into the breach that had been left by the closure of Wyman's site. Over the following four or more years Twinam and his wife updated the website daily, connecting former members through both public and private forums.

A software developer by profession, Twinam was able to design a more sophisticated internet platform which encompassed, among other features, the entirety of the guestbook feature from Wyman's site, as well as documents on the Brethren's history, in particular focusing on the controversies over the events in Aberdeen in 1970 and what Twinam, and others such as Nason, had claimed 'were unmistakable signs that the Exclusive Brethren had become a cult.'²² The site also included a virtual memorial entitled 'Suicide and Murder' for a series of former members who had died either by suicide or, in at least one case, murder. These cases, the virtual memorial claimed, featuring press reports or short biographies, were linked in some way with the deceased having left the Brethren. At the time of its closure, the site alleged that it was 'currently researching nearly 50 deaths that deserve investigation.'²³

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Far more interactive than Wyman's site, particularly in its latest incarnation before it was pulled down in early 2013, Peebs.net amassed an extensive archive, and described what it anticipated would be further development to create a 'modern state-of-the-art web environment'.²⁴ Moreover, the site crossed over from being a mere repository of information and medium for communication to developing an active offline network of 144 helpers in twelve countries who offered exiting Brethren 'a wide range of voluntary services including shelter, counseling, friendship, financial help, jobs and the special bond that cult survivors share'.²⁵ It is likely that it was this function, which Twinam 'credited with having saved lives'²⁶—together with the outside developments described above which had brought the Brethren into sharper public focus—which saw the website become a target of Brethren litigation.

While the tone of the site's content was generally negative, Twinam claimed that he did not 'wish the death of the Exclusive Brethren', but rather the 'ability of families to talk'.²⁷ Regardless, in 2007 the Bible and Gospel Trust sued Twinam and his wife for copyright infringements relating to material which he boasted he had obtained from Wyman's now defunct site, in contravention of the earlier legal settlement with Wyman. The case carried on unsuccessfully for a number of years until Peebs.net was eventually taken down in early 2013, amid ongoing rumours among former members as to the circumstances of its demise. At the time of its demise, active participant and retired Scottish academic, Dr Ian C McKay, described the site as 'the main route through which damning evidence against the Brethren was disseminated by ex-Brethren'.²⁸ While information gathering and dissemination was a major feature of this site, its social function for ex-members appears to have been equally important. As Bachelard noted when asked about it by another journalist:

[Twinam's] using a tool that is incredibly powerful ... I've heard many times the story of people who come out and are separated from family and feel completely alone in the world, *until they come across this website and feel community again*.²⁹

Soon after Peebs.net was taken down the latest site, Wikipeebia.com appeared. In the words of McKay, 'fighting the Internet, whether by bribes, threats or litigation, is a bit like fighting the legendary Hydra. Every time you chop off one of its heads, another two sprout up in its place'.³⁰ Loosely

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based on the Peebs.net site design, but so far lacking the volume of content, Wikipeebia.com appeared in early 2013 but has yet to achieve the level of traffic attained by its predecessor. The reason for this, we suggest, has to do with a migration of former members to Facebook and Twitter for maintaining virtual community, rather than the public forum of Wikipeebia.com, which appears to have become largely the province of a small group of more activist participants. The website administrator of Wikipeebia.com has chosen not to publicly disclose his/her identity, with the domain registered instead under the menacing name of the Amalek Group.

The emergence of Wikipeebia.com has coincided with the issues pertaining to a 2012–13 dispute between the Brethren and the Charity Commission for England and Wales. The website became a source for promoting the lobbying of politicians in support of the Charity Commission's original ruling, which had disallowed the registration of the Brethren's Preston Down Trust on the grounds that it 'had not demonstrated that it had sufficient beneficial impact on the wider community to meet the public benefit requirement to be a charity'.³¹ Moreover, the website, especially through links to the blogs of key participants, seeks to emphasize what former members consider to be detrimental and harmful aspects of the Brethren on their members and the wider community. The Charity Commission agreed in January 2014 to register Preston Down Trust under a series of conditions, much to the chagrin of Wikipeebia.com participants. Since this time the website has sought to promote other campaigns, such as 'Tie a Yellow Ribbon',³² in which former members tied yellow ribbons to the gates of meeting rooms mainly in Britain, recording the names of relatives still in the Brethren or deceased who the former members had lost contact with by virtue of being withdrawn from.

Wikipeebia.com also seeks to maintain a vigilant watch on Brethren activities, for instance, by the dissemination of negative press coverage via Twitter and Facebook and with a button on the welcome page inviting viewers to 'Report a Breach'³³ to the Charity Commission. This is an attempt to highlight what critics contend is the Brethren's self-interested campaign to maintain its charitable status—for example, through its establishment of Rapid Relief Teams to assist during times of community need with catering services. Similarly, the website has published documents critical of the Brethren's growing network of schools both in the United Kingdom and elsewhere, which critics see as potentially damaging to social cohesion and in some instances receiving undue public funding. However, even critics

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have conceded that in many instances these schools have performed at an above-average level.³⁴

While this site has devoted bloggers and a small number of regular participants on its forum, the level of controversy and public interest in the Brethren has reduced in recent years. Moreover, litigation against both Wyman and Twinam by the Brethren has encouraged former members to move toward Facebook groups (with their privacy controls, opportunities for more effective vetting of members, and relative immunity from litigation) to provide a more secure online environment for the maintenance of the supportive functions of virtual community established on earlier sites. While the establishment of virtual community has thus far proven to be a more tangible outcome of the online discussion about the Brethren, it is equally important to examine the strategies of contestation which some participants on these websites have employed in their campaigns against the Brethren.

Cyber propaganda wars: strategies for online contestation

While drawing on a number of perspectives to analyze the strategies for contestation used on anti-Brethren internet sites, in this section we will draw in particular on Cowan's discussion of the use of propaganda in online contestation. Propaganda here is defined as:

A systematic, ideologically driven, action-oriented manipulation and dissemination of information, which is (a) designed for a specific target audience, and (b) intended to influence the beliefs and behavior of that audience in a manner consonant with the aims and objectives of the propagandist.³⁵

This definition does not imply any value judgment on the actors involved in anti-Brethren websites, but rather seeks to examine the wider communicative processes that can be observed in online contestation and the strategies adopted by participants. Of particular interest is how these relate to those strategies adopted by other players in the Cult Awareness Movement (CAM). Augmenting his earlier work with the late Jeffrey Hadden, Cowan identified four interdependent principles that condition whether or not a propaganda campaign is likely to be successful: (1) *affinity*; (2) *repetition*; (3) *consistency*; and (4) *simplicity*.

Each of the anti-Brethren websites has exhibited all of these principles. As suggested above, ExclusiveBrethren.net easily achieved *affinity*, specifically

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among its target audience of former members. Many participants had been subject to the strict disciplinary processes of being shut up and later withdrawn from, and thus stories of these processes relayed on the website, coupled with the increased sectarian tension of the Brethren from 1950 onward, resonated with their personal experiences. This situation provided a readymade audience of former members with a direct affinity, even if, as the case appears to be, many had hitherto been fully integrated into mainstream society and built lives outside with little reference to their Brethren past. Peebs.net and Wikipееbia.com also achieved affinity, as indicated by the comment of Nason that Peebs.net became 'a place for former Exclusive Brethren to bare their souls, pour out their grievances and seek comfort in like-minded people'.³⁶

These themes (and others discussed below) have also achieved some limited affinity with a critical non-Brethren audience and anti-cult activists who have already been sensitized to the negative image of the Brethren which has taken shape since the 1950s. This was summarized well by Harold Rowdon when he referred to the group as having 'forfeited the sympathy of all right-thinking people' and described their system as being comprised of 'crack-pot regulations, ostracism of non-conforming relatives, broken marriages and broken homes, inhumanity and even suicides'.³⁷ It is also worth noting is the way in which different types of media have overlapped here in fostering this wider affinity. Newspaper coverage of the Brethren has been almost entirely negative and the group's public image has on several occasions been severely tarnished, especially in the 1960s and in recent years. Furthermore, new media technologies like Facebook and Twitter have allowed isolated offline media coverage items to achieve a far greater circulation than had hitherto been possible in a pre-social-media environment, which leads us to the second principle of propaganda: *repetition*.

In terms of *repetition*, Cowan notes that for propaganda to be successful it must 'repeat [its] message constantly'.³⁸ One need only read the recurrent negative themes which emerge on these websites to see this aspect in play. Aside from the direct cloning of content between Wyman and Twinam's earlier websites, and the frequent posting and re-posting of negative media material, Wikipееbia.com contains an entire section of ex-member testimonies which contain formulaic accounts framed by a set of suggested questions like, 'Why did you leave or were thrown out?' and 'What was the reason you were withdrawn from?'.³⁹ Furthermore, the site's

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bookshop link contains a combination of recent former member biographies, critical journalistic books, classic secular anti-cult literature, and a selection of nineteenth-century evangelical counter-cult polemics against the Plymouth Brethren.

The perspectives adopted by contributors to the 'True Leavers Stories' section are notable for their ideological divergence. On the one hand there is a small group of participants who have adopted a more secular humanist, anti-cult perspective which draws on insights from counselling psychology or more popular anti-cult discourse (claims of brainwashing, for example). On the other hand, there is group who adopt a more religiously oriented counter-cult perspective, framing their discussion of the Brethren in terms of their post-Brethren Christian identity. As Nason has noted, 'the Peebs.net website was weighted with postings from former EB members who still clung tenaciously to their Christian faith,'⁴⁰ though Nason herself identifies as a secular humanist and utilizes the writings of popular anti-cult writers like Raphael Aron. The recurrent themes of secular, anti-cult discourse are all present here: allegations of family separation, child abuse, suicide, financial malfeasance, brainwashing, as well as more general issues like limited personal freedom and threats posed by the group to social cohesion.

In contrast to this, many religious counter-cult themes are repeated, such as criticisms of the allegedly un-Christian nature of Brethren beliefs and practices when compared with the more mainstream evangelical Christian groups who comprise the majority of Christian counter-cult writers. Most participants adopt what can be defined as a 'rationalist counter-cult perspective,'⁴¹ whereby the Brethren are accused of failing to follow the teachings of Jesus, of perverting the Scriptures, of religious hypocrisy, and of more specific ecclesiological and sacramental aberrations (e.g. their understanding of separation and their adoption of infant baptism rather than believer's baptism). It is also interesting to note, as Italian sociologist Massimo Introvigne observed in a recent conference presentation,⁴² that Wikipedia.com also contains links to a number of anti-Brethren tracts, written by evangelicals during the nineteenth century and now readily available through archival websites, thus repeating a series of predominantly heresiological arguments that have circulated since the emergence of the Brethren in the late 1820s.⁴³

It might at first appear paradoxical to find both secular and religious ideological perspectives derived from the CAM informing criticisms on this website. Yet this functions to increase the degree of *affinity* that the

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critical messages find among a diverse body of former members, as well as to maintain its *consistency* by virtue of the repetition of the negative religious counter-cult and secular anti-cult themes outlined above. Many accusations posted on the site are not restricted to the Brethren alone, but are part of the wider discursive matrix of cult-awareness polemics. They thus amplify the potential affinity with target readers. As Cowan suggests, 'this ongoing replication allows countermovement Web sites to present a consistent message that is repeated over and over, a consistency that contributes in no small measure to the self-limiting construction of reality that informs such material.'⁴⁴ The repetition of a consistent message targeted at the specific audience of former members, both secular and religious, helps to reinforce the viewpoints contained therein and by virtue of this provides little or no space for competing social constructions of reality. Put simply, Wikipееbia.com presents a varied but hegemonic anti-Brethren discourse which brooks little in the way of alternative perspectives. Indeed, as British sociologist Eileen Barker noted regarding her own extensive experience with more negative sectors of the CAM, 'these anti-cultists had no intention of listening to anything that might require them to adjust their images—even if the information came from former members of the movements.'⁴⁵ On the rare occasion a Brethren member stumbles on to one of the forums and attempts to frame their beliefs in a more positive light, they are almost invariably met with a degree of hostility and incredulity. McKay summarizes the attitude of the general website participant toward Brethren contributions on Peebs.net:

Brethren members often contributed fiercely to the discussions on these blogs, apparently trying to defend and support Hales Brethrenism, but seldom used anything more than empty assertions unsupported by evidence or argument, interspersed with *argumentum ad hominem*. Or in English, if you couldn't discredit the message, they would attack the messenger. Or sometimes they would warn him that he was heading for eternal torment in Hell.⁴⁶

While the few Brethren contributions read this way, the hostility certainly goes both ways. This brings us to the final principle of propaganda: *simplicity*.

While these sites often contain some scholarly material which might provide more detailed analysis (although such are an exception), the

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principle of simplicity, namely the deployment of 'simplified analysis of the problem and the proposed solution,'⁴⁷ is readily apparent on Wikipееbia.com as well as earlier sites. The general design of anti-Brethren websites has focused heavily on a highly simplified negative image of Brethren life. The Brethren are reduced to a two-dimensional image like the caricature by Rowdon quoted above. Here one of the attached blogs summarizes this simplified image quite well:

This is the place for those interested in the Hales exclusive brethren cult who actively destroy families, castrate Gays, avoid paying taxes, cause suicide and murder and are told by leader Bruce D Hales to develop an utter hatred of the world!⁴⁸

Here the social construction of the Brethren is simplified and clear, and aims at the 'dissemination of information that "exposes" the group in question, its practices, and/or its leader(s),'⁴⁹ drawing on simplified sets of what British sociologist Stanley Cohen has dubbed an 'inventory of images'—that is, the way in which social phenomena are reduced to a set of exaggerated and distorted criteria.⁵⁰ Furthermore, by doing so the blogger above seeks to 'curtail the group's expansion in a particular social space.'⁵¹ In other words, the construction of reality (or inventory of images) presented on Wikipееbia.com and earlier anti-Brethren sites mirrors those found in offline media that have been identified in earlier studies of how the group has been consistently portrayed as a threat to wider society and is, by extension, underserving of charitable status or public funds for its schools.⁵² The simplified image of the Brethren portrayed here seeks to encourage government and regulatory bodies to institute social control measures against the group's activities, whether this be their earlier transgression into the political sphere, or more recently their amassing of public funding for their schools and religiously-based charitable exemptions, while still fostering a high degree of sectarian tension with the wider society.

Conclusions

In this article we have argued that in the case of the Plymouth Brethren Christian Church 'the Internet ... has provided critics with a relatively low-cost tool with potentially wide impact.'⁵³ However, while a significant amount of material —if not the majority—disseminated on websites like

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ExclusiveBrethren.net, Peebs.net and Wikipееbia.com can be clearly identified as propaganda in sociological terms, this by no means exhausts the functional role played by these websites. Instead, we have suggested that a more important and successful function of such websites has been the establishment and maintenance of a virtual community of former members who engage in mutual support, admonishment and information sharing. Furthermore, we have demonstrated that while participants are by no means unanimous in their current beliefs, these websites provide a social platform for them to make sense of their shared pasts, as well as to seek amelioration for perceived past wrongs committed against them by the Brethren. In general, however, such sites lack wider appeal outside a small target audience of former members, largely as a result of their tailored discourse and the inwardly directed nature of the discussions. Such sites may achieve a strong affinity among former members, but little affinity with a wider internet public aside from those already sensitized to the Brethren's negative public image and CAM discourses. While we have touched upon aspects of the Brethren's response to these websites, such as their use of litigation in attempts to mute criticism or to preserve the integrity of certain internal documents, much more could be written regarding the development of the Brethren's own online presence and their internal negotiations about how they utilize the internet whilst maintaining strict communal boundaries. We hope in the near future to expand more on this important topic.

Endnotes

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Exhibit 2

Declaration of Cheryl Bawtinheimer

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

Rapid Relief Team (RRT) Ltd.,
Plaintiff and Counterclaim-
Defendant,

vs.

Cheryl Bawtinheimer,
Defendant and Counterclaim-
Plaintiff,

vs.

Brown Rudnick LLP, Katy-Jade Church, and
Michael Graif,
Counterclaim-Defendants.

Case No. 4:25-cv-10864-JST

**DECLARATION OF
CHERYL BAWTINHEIMER**

I, Cheryl Bawtinheimer, declare as follows:

1. I am the Defendant and Counterclaim-Plaintiff in the above-captioned matter.

2. I have first-hand personal knowledge of the matters set forth herein, and if called upon as a witness, would and could competently testify thereto.

3. This declaration is submitted in support of the Reply in Support of Motion for a Preliminary Injunction (the "Reply").

4. I am a former Plymouth Brethren Christian Church ("PBCC") member, though at the time it was called the Exclusive Brethren.

5. After leaving the cult, I started the Get-a-Life Podcast ("GAL") on YouTube, in collaboration with other former members.

6. I started GAL to show solidarity with other former PBCC members, to try and create a community that can act as a support network for those who leave, to provide information about the PBCC, and to comment upon the PBCC to warn the public about this organization.

7. GAL is devoted to revealing hypocrisy in the cult and sharing stories about members who have left and suffered trauma at the hands of the PBCC.

1 8. I receive many messages from people who have escaped PBCC, and use my podcast
2 as a source of hope and support. Many of these people use my podcast as a lifeline. My podcast
3 is not mere entertainment. It is a resource for people who are hopeless, feel trapped, are
4 excommunicated, and traumatized by the PBCC.

5 9. A true and correct copy of a sampling of those messages is attached hereto as
6 **Composite Exhibit 3** to the Reply.

7 10. In discussing RRT, I have posted videos on both the “Get A Life Podcast” YouTube
8 channel and the “Rapid Relief Team – Exposed” channel.

9 11. The “Get A Life” channel currently has 1 Copyright strike, and the “Rapid Relief
10 Team – Exposed” channel has 2 Copyright strikes, because of RRT’s abusive and false DMCA
11 Notices.

12 12. A true and correct copy of my YouTube Copyright strikes is attached hereto as
13 **Exhibit 6**.

14 13. If I continue to get Copyright strikes, I will lose my YouTube channels and all of
15 the videos on them. I will not be able to re-upload them on YouTube.

16 14. This means I will lose my entire following, which I’ve spent years growing. This
17 will ruin all goodwill with my viewers.

18 15. Even if I put up the exact same videos again, it would not cure the harm caused by
19 the strikes. Each video had backlinks from across the internet leading to them. Each video had
20 user views that matter for page ranking. Each video had significant engagement in the comments.

21 16. All of that is lost if I repost the same videos. I need the original videos with the
22 same URLs restored to cure the harm of the strikes.

23 17. I receive many messages from PBCC survivors, who express to me that they use
24 my podcast as a lifeline.

25 18. A true and correct copy of a sample of those messages is attached as **Composite**
26 **Exhibit 9** to the Reply.

27 19. If I don’t get an injunction, I face a permanent loss of the audience for whom I

1 create my content. This would be an especially dire consequence for the victims of the PBCC
2 whose only lifeline is the Get-a-Life Podcast.

3 20. At first, YouTube reinstated my videos when I submitted counter-notice
4 establishing that my use of the RRT Logo was a fair use. It was not until January 29, 2026, that
5 YouTube stopped reinstating the videos in light of this lawsuit.

6 21. A true and correct copy of the January 29, 2026, email from YouTube is attached
7 as **Exhibit 10** to the Reply.

8 22. I am not a lawyer. I did not know what to do when I was sued. And I cannot afford
9 legal representation. It took me quite some time to find a lawyer willing to defend me on a mostly
10 contingent fee basis, because while it is not very hard to find an American lawyer who will sue
11 someone on a contingent fee basis, it was hard for me to find someone willing to take a defense
12 case on contingency plus the meager fundraising I was able to do.

13 23. I understand that it is usually a good thing to seek an injunction as fast as you can,
14 but I moved as fast as I could, desperately seeking representation in a foreign nation, without much
15 money to pay for that help. I could not have possibly moved faster than I did.

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

18 Executed on 04 / 27 / 2026.

Cheryl Bawtinheimer

Cheryl Bawtinheimer

Exhibit 3

Emails from Victims Still in The Cult

4/26/26, 3:06 PM

Emails from insiders | info.getalife@proton.me | Proton Mail

thanks

From [REDACTED]
To info.getalife@proton.me
Date Monday, [REDACTED] 2:16 PM

Hello from someone still in the PBCC.

I just want to say thank you. For being a voice for those of us who have not figured out how or been strong enough to use our own. For being a place people like myself can find themselves able to directly relate to others on.

I saw sending an email as an opportunity to try find my voice - to do something, start somewhere. Im not sure I'm prepared for/know what comes next - but I can't keep trying to ignore it. So here it is. I wish I didn't need to be anonymous but unfortunately I'm not at a point where I can say who I am. I appreciate your understanding of this.

Do you really hear from lots of us in here? I'm truly curious how many/from what countries. I wish there was a way for us to know/support each other. Somehow we need to be able to find each other in here. I just dont know how it would work/if people would trust each other. I'm very certain there would be undercover people trying to find us out under the guise of agreeing/being one of us.

Personally I'm just simply done with it all. But I don't know what to do. Everything is so deeply entangled. I went seeking some sort of confirmation I'm not totally crazy when I started to get the sense I'm not the only one that might have these feelings - and apparently that feeling was right...

I don't have a desire to cause a big stir or try explain my beliefs to anyone inside that would try convince me otherwise. But as you know it's not as easy as just standing up and walking away. It begins to feel sort of hopeless, like your intentionally trapped. You are made to feel like your struggless are all your own fault because you weren't/aren't obedient enough/didnt follow closely enough - when actually its the furthest thing from the truth.

It's been a slow burn for me as things have crept more exclusive and really just bizarre and nosensical. It sort of comes over you in waves. Then eventually you are faced with "what am i going to do about it?"

This is where I wish there was someway to connect with others inside that are feeling the same way - and maybe the support of each other would enable us to advocate for change or stand up for ourselves together.

I feel like what might have been original intentions of following a sort of simple Christianity went out the window a LONG time ago in this group. It's basically seems like a campaign to secure and maintain revenue streams at this point, in my opinion.

Long story short - I want to say thanks to everyone.

Sent with [Proton Mail](#) secure email.

I have been in fellowship for 38 years. In those 38 years, I cannot remember a more dangerous time than the present. Let no one be fooled – Bruce D Hales is a very desperate and dangerous individual, I would go so far as to replace the word individual with the word dictator. He will stop at nothing to achieve his end and if that means death, so be it.

No one gets in his way. He is God, and his word goes. Get up against him and you'll be removed in an instant. No mercy, no time to say sorry, just silently removed through being shut up or withdrawn from. He will often offer amnesties to young people to “get right and get in the clear” but let's be very clear – no such amnesty has ever existed. You confess your sins at your own peril. Confess your sins and you're sure to be removed, shut up, withdrawn from, shunned.

His lust for power and money has consumed him. The Bible, the Word of God means nothing to him, and I will go as far as to say that there is no work of God in him whatsoever. He has a serious issue with alcohol addiction, and this comes through very clearly and very strongly. Constant crying, breaking down, sobbing during meetings and preachings indicates that addiction has completely consumed his way of life. He spends all week at home, except for coming out on a Saturday and a Sunday to try and convince his ever-dwindling flock.

The Plymouth Brethren Christian Church is like a Venus Fly Trap. The outside appearance of the flower is beautiful, beyond words. The nectar within is heavenly. You are charmed by the outstanding beauty of this flower and long for the nectar within. You instinctively enter as your curiosity is overcome. Upon doing so, the flower closes over, trapping you and entombing you on the inside. There is no escape, no time for second thoughts, it's over. Those too weak to fight, give up and are consumed. Some of those stronger members fight and escape, but not without loss, heartache for those they leave behind.

Author – Anonymous.

15.07.2025

4/26/26, 3:05 PM

Emails from insiders | info.getalife@proton.me | Proton Mail

Info

From [REDACTED]
To info.getalife@proton.me
Date Thursday, [REDACTED]

Hello Cheryl,

I'm a young mom still inside the brethren.... Been listening to all of the podcasts!! And have been compiling a list of things to tell you 😊

There is another webinar scheduled for next week for all parents of OSG kids, to do with bullying. It is really bad, there is absolutely a hierarchy in the schools. [REDACTED] has been bullied simply for being friendly to the unpopular girls, and so that's opened up my eyes to what goes on there. Mind you she was bullied in public school too, to a lesser extent, but at OSG the kids all know each other so well that they have way more ammunition.

I would say about 80 to 90% of brethren have literally no clue what is really going on inside. Thank goodness your podcasts are public and those on the inside are starting to spread the word!!

The business seminar that was held on Dec 19th was supposed to be streamed worldwide to all businesses and it wasn't. I personally think it's because of people becoming aware of what is really going on inside the system, and the podcasts are raising awareness!! I want to see this system of control crumble, so badly.

Brethren drink alcohol to numb their consciousness, otherwise you think too much and it's too painful. Speaking from experience, I've pushed things away for many years that I don't agree with, because it feels impossible otherwise.

What you're doing is courageous and much appreciated ❤️ keep them coming!! It's causing very interesting conversations in our house, that's for sure!

Much love from an insider

4/26/26, 3:06 PM

Emails from insiders | info.getalife@proton.me | Proton Mail

thanks

From [REDACTED]

To info.getalife@proton.me

Date Monday, [REDACTED]

Hello from someone still in the PBCC.

I just want to say thank you. For being a voice for those of us who have not figured out how or been strong enough to use our own. For being a place people like myself can find themselves able to directly relate to others on.

I saw sending an email as an opportunity to try find my voice - to do something, start somewhere. Im not sure I'm prepared for/know what comes next - but I can't keep trying to ignore it. So here it is. I wish I didn't need to be anonymous but unfortunately I'm not at a point where I can say who I am. I appreciate your understanding of this.

Do you really hear from lots of us in here? I'm truly curious how many/from what countries. I wish there was a way for us to know/support each other. Somehow we need to be able to find each other in here. I just dont know how it would work/if people would trust each other. I'm very certain there would be undercover people trying to find us out under the guise of agreeing/being one of us.

Personally I'm just simply done with it all. But I don't know what to do. Everything is so deeply entangled. I went seeking some sort of confirmation I'm not totally crazy when I started to get the sense I'm not the only one that might have these feelings - and apparently that feeling was right...

I don't have a desire to cause a big stir or try explain my beliefs to anyone inside that would try convince me otherwise. But as you know it's not as easy as just standing up and walking away. It begins to feel sort of hopeless, like your intentionally trapped. You are made to feel like your struggless are all your own fault because you weren't/aren't obedient enough/didnt follow closely enough - when actually its the furthest thing from the truth.

It's been a slow burn for me as things have crept more exclusive and really just bizarre and nosensical. It sort of comes over you in waves. Then eventually you are faced with "what am i going to do about it?"

This is where I wish there was someway to connect with others inside that are feeling the same way - and maybe the support of each other would enable us to advocate for change or stand up for ourselves together.

I feel like what might have been original intentions of following a sort of simple Christianity went out the window a LONG time ago in this group. It's basically seems like a campaign to secure and maintain revenue streams at this point, in my opinion.

Long story short - I want to say thanks to everyone.

Sent with [Proton Mail](#) secure email.

4/26/26, 3:06 PM

Emails from insiders | info.getalife@proton.me | Proton Mail

Thank you

From

[REDACTED]

To info.getalife@proton.me

Date

[REDACTED]

I've just watched the latest interview with Dan - so inspirational and I found this one particularly relatable!

A big thank you for your efforts with these videos - I watch them all.

As you say on this video, if only the pbcc system was less stringent and allowed more freedom to choose a life that works for each person individually based on their personality etc. rather than forcing everyone down a strict and rigid path of we'll do the thinking, you just do what we say.

Keep up the good work

[REDACTED]

4/26/26, 3:09 PM

Emails from insiders | info.getalife@proton.me | Proton Mail

PBCC

From [REDACTED]
To info.getalife@proton.me
Date [REDACTED]

Hi,
I watch your videos with interest, and everything you guys are doing.
I'm still in the PBCC, but I've been feeling completely disillusioned for a long time now.
In my view it's no longer a Christian church, but a corporate, commercial and political organisation. It's a crock.
I can feed you info about what's going on in here from time 2 time.
What would be the best email address to send info to?

PS. My true identification needs to be confidential.

Look forward to hearing from you.
Ciao.

Sent with [Proton Mail](#) secure email.

I'm in the PBCC and would like to connect

From [REDACTED]

To info.getalife@proton.me

Date [REDACTED]

Hi Cheryl, [REDACTED]

I'm [REDACTED] still on the inside! I'd love to connect with you all.

I have cried buckets of tears watching your podcast, the stories you're telling need to be told, in most part for the people still in the cult. I reckon that even if some can't/won't leave, there is power in non-compliance.

I had my [REDACTED] much as me in the [REDACTED] all in large caused by the heart break and stress of this cult. I was diagnosed with [REDACTED] so this also contributes to my health situation.

While I am still in [REDACTED] haven't listened to any recordings, throw my white books straight in the bin and generally disconnected from the peeps with the exception of my family. I go to the supper most weeks but that's it. [REDACTED]

[REDACTED]

I don't need to tell you this, but please keep my contact with you confidential for now at least. I want to leave very badly, but I'm unsure of whether my mind and body could cope with it.

Much love to you all, [REDACTED]

Sent with [Proton Mail](#) secure email.

Email for Cheryl

From [REDACTED]
To info.getalife@proton.me
Date [REDACTED]

To Whom It May Concern,

As a concerned member of the PBCC, I feel compelled to address a topic that has been weighing heavily on my mind – the escalating issue of alcohol and its destructive impact on our lives.

One cannot ignore the fact that alcohol's influence stretches beyond the individual. Relationships, whether familial, or friendly, often bear the brunt of its impact. The once-joyful gatherings can quickly morph into tense environments, marked by misunderstandings, and emotionally charged outbursts. The veil of alcohol can cloud rational thinking, making conflicts harder to resolve and driving wedges between even the closest of families.

At the heart of our community are families – the building blocks that hold our society together. Yet, the influence of alcohol can weaken these bonds. The absence of a sober and attentive presence can leave families vulnerable. The family unit, so vital to the development of the next generation, can become fractured, leading to long-lasting scars on the emotional well-being of children and adults alike.

We owe it to ourselves and to future generations to create an environment that nurtures healthy bodies, fosters resilient relationships, and upholds the sanctity of the family unit.

Thank you for taking the time to read this letter.

Anonymous PBCC member

Sent with [Proton Mail](#) secure email.

4/26/26, 3:18 PM

Emails from insiders | info.getalife@proton.me | Proton Mail

(No Subject)

From [REDACTED]

To info.getalife@proton.me

Date [REDACTED]

Hi guys. Love the podcast, great work you're doing exposing peoples stories.

I'm a member and still in the church and was sexually abused [REDACTED] years old. I then suffered from [REDACTED] It was on any occasion that he had a chance. Sometimes I want to get justice so bad, and get that motherfucker of a human locked up. I was silent for so long and wouldn't even tell my mum what was happening as he threatened he would kill me if I said anything. Being a small kid you take shit like that seriously. Even after it stopped, he said sorry at the meeting and it all got swept under the carpet [REDACTED] when this happened. By the time I got to the brethren school age I was so badly bullied also. [REDACTED]

[REDACTED] yet growing up my parents still allowed him to have to do with me and our family. Every time after he came to our house or we had anything to do with him I felt physically sick.

[REDACTED]

I hope God never forgives him and he rots in hell. Because fuck me I would sure hate to be in heaven with that absolute c of a human.

Please please keep my name and the following info private:

[REDACTED]

If you read my story out please do not put my name in there I'm not ready to share publicly. And I wouldn't be able to deal with the brethren response (you know they never believe the women). But if it does it needs to be read by Cheryl I relate to her the most. Love you Cheryl xx
Keep up the work guys.

[REDACTED]

4/26/26, 3:18 PM

Emails from insiders | info.getalife@proton.me | Proton Mail

A little thumbs up from the inside lol

From [REDACTED]

To info.getalife@proton.me

Date [REDACTED]

Heya just thought I'd drop a message saying thanks for the hours of content... Listen to them all religiously and the blackballed podcasts.

Keep up the good work,

[REDACTED]

P.s please keep my name/contact confidential... Can't be bothered with any dramas. Thanks

4/26/26, 3:21 PM

Emails from insiders | info.getalife@proton.me | Proton Mail

a little insight into the brethren schools

From [REDACTED]
To info.getalife@proton.me
Date [REDACTED]

Hello,

My name is [REDACTED] inside the exclusive brethren church.

I'm emailing because I have been searching for people that understand what I am going through in ways that none of my friends on the outside can, although they try very hard. I am in the process of moving out of my home to live with a family that I know I will be safe with, I have tried to look into the olive leaf program but unfortunately it is not open on the community computers or phones due to streamline restrictions, however, my local community services have been very kind to me and [REDACTED] I have to say after years of being an outcast for my modern thinking and my parents not fitting the mold, I have been relieved to find people that are so kind and supportive. I have been listening to your podcasts, which I love, and have noticed that you have not had a point of view of how things in the brethren schools are recently, and I thought I would send an email to share some major issues that I think it would be interesting to address. Because of the kids high and mighty attitude, the teachers get no respect, the kids do as they please and the teachers are powerless to stop it because of the lack of support from parents. things like alcohol, racism, and bullying run absolutely rampant. I remember my very first day at one school, [REDACTED]

[REDACTED]

[REDACTED] those years have left permanent marks on my self-confidence, [REDACTED]

[REDACTED]

because the parents and trustees of the campuses just think it's funny. Racism is a massive problem, 3 teachers that I have known of have left this year because of racist comments, and our on-campus science teacher (he is Indian) refuses to sit with our class because of the comments and jokes that get thrown at him, racial slurs are thrown around casually.

Thank you for reading my email, thank you for all that you do I know that it must be scary, but someone has to do it.

Much love, [REDACTED]

4/26/26, 3:23 PM

Emails from insiders | info.getalife@proton.me | Proton Mail

(No Subject)

From [REDACTED]

To info.getalife@proton.me

Date [REDACTED]

Hi there,

I am a PBCC insider. Been watching a handful of your podcasts, some of which are quite interesting.

Hopefully you have a bunch of good names lined up for 2024 for sharing their stories on the podcast - looking forward to hearing them.

Thanks.

P.S - My name [REDACTED] is a fake name I have used for a while to keep my identity hidden.

Fwd: PBCC Household Child Safety Training

From [REDACTED]

To info.getalife@proton.me

Date [REDACTED]

Hi Cheryl,

I thought you might be interested in the below email received this morning obviously your hard work is rocking the boat!

Keep up the good work. I look forward every day to the next podcast being released. You are exposing this shitty cult that I am stuck in (at the moment)

PS - I dont mind you publicising the below please just remove my details.

Best regards,

[REDACTED]

From: PBCC Child Safety Group [REDACTED]

Sent: [REDACTED]

To: [REDACTED]

Subject: PBCC Household Child Safety Training



Important Household Training Program | Action Required

[REDACTED]

We wish to advise the Brethren that the PBCC Child Protection Policies have been

4/26/26, 3:21 PM

Emails from insiders | info.getalife@proton.me | Proton Mail

nov 2

From [REDACTED]
To info.getalife@proton.me
Date [REDACTED]

Hello,

It's been a while since I emailed in. I'm still not ready to introduce myself, but I want to say thanks again from a pbcc insider desperate to get out. Thank you for what your doing and to everyone that comes on the podcasts and shares their story. It gives hope to those of us still in that are grappling with what this group is, but haven't been able to separate from it yet.

I hope you don't mind me getting some things off my chest, I don't mean to be negative or to bash anyone - but I have proved typing things out brings clarity and gives power so here goes.

A topic that's been heavy on my heart recently and I want to share (one of many hanging out on my shelf): PBCC member general conversation.

Take Sunday for example, "The Lords Day". Other then at meeting Jesus name is rarely mentioned. No one's conversing about their faith... not after the meeting, not at the break...not that I think that needs to be the only topic, thing is, it rarely happens. Any day really- if you mention God; most people seem uncomfortable/awkward or they come across as seeming to not register what you said/don't know how to respond. I admit this was me in years past, going through the paces, floating in the shallows. But why?

I have experienced this awkward conversation scenario multiple times recently in my journey of finding my faith; bringing Jesus name into conversation or thanking God for a blessing randomly, to be received with a blank stare/no comment. Maybe I don't seem the "spiritual" type, which I can understand, but it seems a bit odd. Granted, I wouldn't expect any human I come across on this planet to respond about Jesus or share spiritual experiences with. However, I would have thought a conversation around that topic could be freely had/normal with a fellow member of the PBCC. Makes you wonder.

These days the conversation outside of meetings seems to revolve around the "ecosystem" hustle, current ministry (which is more talked about then the Bible), business, idolizing leaders/wealthy business owners etc. I guess that's what's most important in here. I feel like the conversation/goal is getting further and further away from what's really important. To the point where it's now out of control, and being fueled by people propped up as "successful, influential, close to our brother" for everyone to follow after/take directions from. There is no getting back to basics now. The simple things that matter most have been left in the dust.

I have a hard time recalling a time where someone genuinely impromptu spoke raw and openly from their heart of their faith/ spiritual experiences in a casual setting - unscripted. I guess people just don't have those conversations in social settings. Or maybe I just havent been paying attention, (altho I've been around for awhile 😊) but it begs the question, why not?

Where is our faith? Why isnt it talked about? Is it alone in Jesus? What really matters? Who am I serving? I find strength in honestly asking myself these questions. The answers are so easy when put it in simple terms.

4/26/26, 3:04 PM

Emails from insiders | info.getalife@proton.me | Proton Mail

Cheryl

From [REDACTED]
To info.getalife@proton.me
Date [REDACTED]

Hello Cheryl,

Just a short line to say hello and hope you are all well. Love the podcasts – keep them coming.

A friendly word of caution. As you know, you are receiving a lot of information from inside and you reference this in your podcasts. You have also made your two email addresses public in the podcasts.

Please make sure that your email and computer security has no holes in it. The PBCC don't like the fact all this information is leaking and they will be actively trying to stop it by whatever means possible. If you receive attachments or links from the inside, be careful before opening them. [REDACTED]

One of their favourites is to sue for defamation – make sure you have all your bases covered if they try this one.

Stay safe, keep smiling and look forward to the next podcast.

Lots of love.

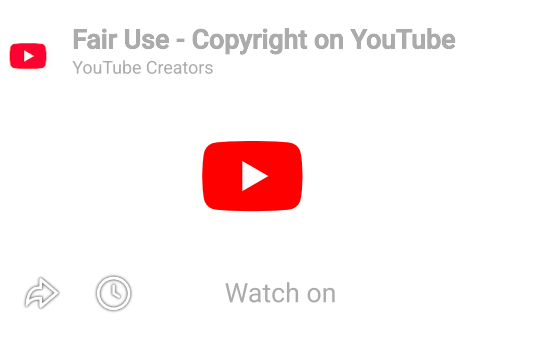
Exhibit 4

YouTube: Fair Use

Fair use on YouTube

In US copyright law, fair use allows someone to use copyrighted content under certain conditions without needing permission from the copyright owner. Common examples can include works of commentary, criticism, research, teaching, or news reporting.

Ultimately, courts decide fair use cases according to the facts of each unique case. You'll probably want to get legal advice from an expert before uploading videos that use copyrighted content.



Subscribe to the [YouTube Creators channel](#) for the latest news, updates, and tips.

Four factors of fair use

In the US, when courts decide fair use cases, a judge will consider how the four factors of fair use apply to each unique case. The four factors of fair use are:

1. **Purpose and character of the use:** Nonprofit education uses are more likely to be considered fair use than commercial uses. Adding new expression or meaning to the original material is more likely to be considered fair use than merely copying the original.
2. **Nature of the copyrighted work:** Using material from primarily factual works is more likely to be considered fair use than using purely fictional works.
3. **Amount and substantiality of the portion used:** Borrowing small bits of material from an original work is more likely to be considered fair use than borrowing large portions. But, if what's borrowed is considered the "heart" of the work, sometimes even a small sampling may not be considered fair use.
4. **Effect of the use upon the potential market:** Uses that harm the copyright holder's ability to profit from their original work are less likely to be fair uses. Courts have sometimes made an exception under this factor in cases involving parodies.

Am I protected by fair use if I...

Give credit to the copyright owner?



Transformativeness is usually key in the fair use analysis. Giving credit to the owner of a copyrighted work won't by itself turn a non-transformative copy of their material into fair use. Phrases like "all rights go to the author" and "I do not own" don't automatically mean you're making fair use of that material. They also don't mean you have the copyright owner's permission.

Include a disclaimer in my video?



There aren't any magic words to automatically apply fair use when you use someone else's copyrighted work. Including the phrase "no infringement intended" won't automatically protect

you from a claim of copyright infringement.

Say I'm using the content for "entertainment" or "non-profit" purposes?

Courts will carefully review the purpose of your use in evaluating whether it's fair. Declaring your upload to be "for entertainment purposes only," for example, is unlikely to tip the scales in the fair use balancing test. Similarly, "non-profit" uses are favored in the fair use analysis, but it's not an automatic defense by itself.

Add my original material to someone else's copyrighted content?


Even if you've added something to someone else's content, it still may not be considered fair use. If your creation doesn't add new expression, meaning, or message to the original, it probably isn't fair use. As with all the other cases discussed here, courts will consider all four factors of the fair use test, including the quantity of the original used.

Live outside the US?

While rules about copyright exceptions are often similar around the world, they can differ. Different countries and regions may have different rules about when it's allowed to use copyrighted content without the copyright owner's permission.

For example, in the EU, the use must fit into specific categories, such as quotation, criticism, review, caricature, parody, and pastiche. Other countries/regions have a concept called fair dealing that may work differently.




Keep in mind that we consider local rules when we review copyright removal requests. You can view the [YouTube Copyright Transparency Report](#)  for more info on how we process copyright removal requests, including how often we request additional info from copyright holders who claim a video doesn't qualify for a copyright exception.

Frequently asked questions (FAQ)


How does Content ID work with fair use?

If you upload a video containing copyrighted content without the copyright owner's permission, you could end up with a [Content ID claim](#). The claim will keep you from [monetizing](#) the video, even if you only use a few seconds, such as short uses of popular songs.

Automated systems like Content ID can't decide [fair use](#)  because it's a subjective, case-by-case decision that only courts can make. While YouTube can't decide on fair use or mediate copyright disputes, fair use can still exist on YouTube. If you believe that your video falls under fair use, you can defend your position through the [Content ID dispute process](#). This decision shouldn't be taken lightly. Sometimes, you may need to carry that dispute through the appeal and DMCA [counter notification process](#).

If both you and the claimant try to monetize a video under dispute, the video will still monetize until the dispute is resolved. Then, we'll [pay out the accrued earnings to the appropriate party](#).

Options to resolve claims outside the dispute process

The easiest way to deal with Content ID claims is to avoid them in the first place. Check out the [YouTube Audio Library](#)  for copyright-free music in your videos. If you choose to get music from other royalty-free or licensing sites, be sure to read the terms and conditions carefully. Some of

these services may not give rights to use or monetize the music on YouTube, so you could still end up with a Content ID claim.


If you get a Content ID claim for music that isn't essential to your video, try [removing it](#) or [replacing it](#) with copyright-free tracks from the YouTube Audio Library. You can also re-upload the video without the copyrighted content.

What is YouTube's fair use protection initiative? ^

In rare cases, we've asked YouTube creators to join an initiative that protects some examples of "fair use" on YouTube from copyright removal requests. Through this initiative, YouTube indemnifies creators whose fair use videos have been subject to removal requests for up to \$1 million of legal costs in the event the removal results in a copyright infringement lawsuit.

The goal of this initiative is to make sure these creators have a chance to protect their work. It also aims to improve the creative world by educating on both the importance and limits of fair use. Because of the variation in the rules governing such uses by different countries/regions, as described [above](#), we're only able to offer this initiative to creators living in the United States who agree to have their videos only available in the United States.

Recommended for you

 **YouTube access restrictions for users under the age of 1...**

Need more help?

Try these next steps:

 **Post to the help community**
Get answers from community members

Exhibit 5

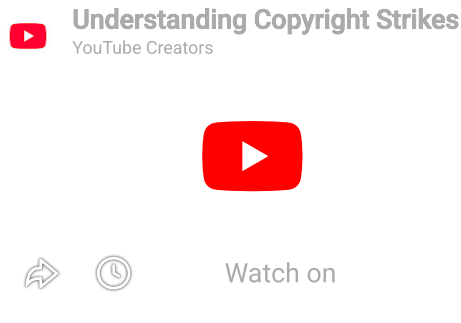
YouTube: Understand Copyright Strikes

Understand copyright strikes

Copyright strikes are different from [Community Guideline strikes](#) and [Content ID claims](#).

If you get a copyright strike, it means your content was removed due to a legal [copyright removal request](#). These requests are [reviewed](#) and, if they appear to be valid, we have to remove the content to comply with copyright law.

Copyright strikes expire in 90 days if you complete [Copyright School](#) and your channel has fewer than 3 copyright strikes. You can also resolve them by getting a [retraction](#) or submitting enough valid [counter notification](#). Channels that get 3 copyright strikes in 90 days are subject to termination.



Subscribe to the [YouTube Creators channel](#) for the latest news, updates, and tips.

What happens when you get a copyright strike

When your channel gets a copyright strike, we'll email you and explain why. We'll also explain how to [resolve the copyright strike](#). Official notifications come from no-reply@youtube.com.

Here's what happens to your channel:

1 copyright strike:

- We remove the content from YouTube.
- You can complete [Copyright School](#) to have the strike expire in 90 days, otherwise it will remain active on your channel.

2 copyright strikes:

- Same steps as above.
- If Copyright School was completed, the strike will expire in 90 days, otherwise it will remain active on your channel.

3 copyright strikes:

- Your account, along with any associated channels, is subject to termination.
- If your channel is terminated, content uploaded to your channel will be inaccessible.
- You can't create new YouTube channels.

Note:

- Content can be removed from the site for [reasons](#) other than copyright.
- Videos can only have 1 copyright strike at a time.

Resolve a copyright strike

There are 3 ways to resolve a copyright strike:

- **Complete Copyright School and wait 90 days:** Copyright strikes expire after 90 days if [Copyright School](#) is completed.
- **Get a retraction:** You can get in touch with the person who submitted the copyright removal request and ask them to [retract the copyright removal request](#).
- **Submit a valid counter notification:** If you think your content was removed by mistake, or qualifies as a copyright exception, like [fair use](#), you can [submit a counter notification](#).

Note: If the copyright removal request was [scheduled](#), it means you have 7 days to delete your content and avoid the copyright strike. To see if you have this option, check the copyright strike email sent from no-reply@youtube.com. In all other cases, deleting a video doesn't resolve a copyright strike.

Get info about a copyright strike

[Computer](#) [Android](#) [iPhone & iPad](#)

1. Sign in to [YouTube Studio](#).
2. On the **Dashboard** look under **Active copyright strikes** for info about copyright strikes.

or

1. Sign in to [YouTube Studio](#).
2. From the left menu, click **Content**.
3. Click the filter bar **> Copyright**.
4. In the **Visibility** column, find a video with "Removed" status.
5. In the **Restrictions** column, hover over **Copyright**.
6. Click **See details**.
 - a. On the overview page, you can see the impact of the copyright strike on your video and channel, the current status and content used.
 - b. Click **See details** to see the claimant's name and where in your video the claimant's content appears. If the strike was issued against a specific audio track, you will see this information under **Infringing audio track**.



If you don't have access to your channel, you can find info about your copyright strike in the email YouTube sent (from no-reply@youtube.com) to notify you that your content was removed.

YouTube Partner Program (YPP) courtesy period

If your channel is part of the YouTube Partner Program (YPP), you're eligible for a 7-day courtesy period. After 3 copyright strikes, you'll have 7 additional days to take action before your channel is terminated. During this period, your copyright strikes won't expire and you can't upload new videos. But, your channel will remain active and you can access it to resolve your copyright strikes. You can either submit valid [counter notifications](#) or ask for [retractions](#). Deleting the affected content doesn't resolve the strikes.

If you submit [counter notifications](#) that bring your copyright strike count under 3, and those counter notifications are forwarded to the claimant, your channel will not be terminated, and your upload ability will be restored. If your copyright strikes are resolved by retraction, your channel won't be terminated.

Frequently asked questions (FAQ)

What is Copyright School?

Copyright School consists of 4 questions about how copyright works on YouTube.

Do I need to complete Copyright School to clear a copyright strike?

Yes, to clear active copyright strikes on your channel, you'll need to complete Copyright School. After completing, your strike will clear 90 days from the day it was applied to your channel. You only have to complete Copyright School once.

Can live streams get copyright strikes?

Yes, if your active live stream is [removed for copyright](#), your channel will get a copyright strike and your live streaming access will be restricted for 7 days. If your channel gets another copyright strike, the live stream restriction will last 14 days.

I got a claim on my video, does that mean I'll get a copyright strike?

[Content ID claims](#) are different from copyright strikes. If you get a Content ID claim on your video, it typically doesn't result in a copyright strike.


However, if you [dispute a Content ID claim](#) without a valid reason, the copyright owner has the option to [submit a copyright removal request](#) for your content. If the copyright removal request appears [valid](#), your content would be removed from YouTube and your channel would get a copyright strike.

What happens if a channel that's linked to mine gets a copyright strike?

If a channel linked to yours has 3 active copyright strikes, your channel is also subject to termination.

Similarly, if your channel has 3 active copyright strikes, other channels linked to yours are subject to termination.

Recommended for you

 [YouTube access restrictions for users under the age of 1...](#)

Need more help?

Try these next steps:


 [Post to the help community](#)
Get answers from community members

Exhibit 6

Copyright Strikes

Copyright strikes

Finish Copyright School for your strike to expire Start now

⚠️ 2 copyright strikes

We received a copyright removal request for your video. Based on applicable copyright law, we removed your video from YouTube.

As a result:

- Your video was removed from YouTube
- Your channel received a strike

If you get 3 copyright strikes, your channel (along with any associated channels) will be subject to removal.

[Learn more about copyright strikes](#)

What you can do

- Do nothing. Strikes expire after 90 days, as long as you complete Copyright School.
- Request retraction ?
- Submit counter notification ?

Deleting the video will not remove the strike.

Content removed

The following videos have been removed from YouTube due to a copyright removal request

Strike on February 10, 2026 Expires on May 11 if Copyright School is completed

Content removed by Rapid Relief Team (RRT) limited

Video	Content used	Actions
 2:13:15	Get A Life Ep.144 Rapid Relief Te... Uploaded Oct 10, 2025 Info available on request ?	Select action

Copyright strikes

Strike on February 10, 2026 Expires on May 11 if Copyright School is completed

Content removed by Rapid Relief Team (RRT) limited

Video	Content used	Actions
 2:13:15	Get A Life Ep.144 Rapid Relief Te... Uploaded Oct 10, 2025 Info available on request ?	Select action

Strike on January 28, 2026 Expires on Apr 28 if Copyright School is completed Strike contains 3 videos ?

Content removed by Rapid Relief Team (RRT) limited

Video	Content used	Actions
 1:41:24	Get A Life Ep.145 Rapid Relief Te... Published Oct 11, 2025 Info available on request ?	Select action
 5:07	Plymouth Brethren Christian Chur... Published Oct 11, 2025 Info available on request ?	Select action
 9:52	Chapter 2 part 1 Rapid Relief Tea... Published Oct 10, 2025 Info available on request ?	Select action

Exhibit 7

10 News+ YouTube Video

***To be filed conventionally
with the Clerk's Office.**

Exhibit 8

BrownRudnick
Alaska Airlines Article

June 19, 2024 | 5 minute read

Alaska Airlines Must Pay to Use Virgin Brand Even Though It Is Not Using the Brand



David Knight

Counsel



A recent **judgment** of the English Court of Appeal demonstrates the importance of examining licence agreements in corporate transactions.

This case was between the Virgin Group and Alaska Airlines. The history goes back to 2018 when the airline Virgin America merged with Alaska Airlines, on which date Virgin America ceased to exist and all rights and obligations were assumed by Alaska Airlines. Thus Alaska became a party to a licence agreement by which the internationally well-known Virgin Group had licensed to Virgin America the rights to

use the Virgin brand. The licence included obligations to make royalty payments including minimum royalty payments of about USD 8 million per annum, increasing over the 25 year life of the licence agreement.

As those familiar with U.S. domestic airlines will know, Virgin America subsequently was de-branded, taking instead the Alaska Airlines brand. Within just under one year, Alaska Airlines had ceased any use of the Virgin brand and had ceased making any royalty payments including the minimum royalty payments. Virgin sued.

Key clauses in the licence agreement were:

Cause 3.6 "Subject to Clause 3.7, [Alaska] undertakes that, for as long as it provides the Licensed Activities it shall continue to do so using the Names [i.e. the Virgin brand] and shall use all reasonable efforts to promote its conduct of the Licensed Activities under the Names."

Clause 3.7 "Notwithstanding any other provision of this Licence nothing in this Licence shall prohibit [Alaska] at any time during the Term from electing to perform the Licensed Activities or any other activities, including, but not limited to, operating flights, code sharing arrangements with any other airlines or entities, or operating flights between any points regardless of where such flights originate or terminate, without the payment of royalties, so long as [Alaska] does not use the Names or Marks while undertaking such activities."

Clause 8.1 "In consideration of the Airline Rights granted pursuant to Clause 3, [Alaska] agrees to pay [Virgin]: (a) with effect from the Effective Date and until December 31, 2015, a quarterly royalty which shall be 0.5% of Gross Sales in respect of each Quarter or part of a Quarter; (b) with effect from January 1, 2016 and until the Trigger Date, a quarterly royalty which shall be 0.7% of Gross Sales in respect of each Quarter or part of a Quarter; and (c) with effect from the Trigger Date and for the remainder of the Term, a quarterly royalty which shall be 0.5% of Gross Sales in respect of each Quarter or part of a Quarter In each case, subject to the requirement that [Alaska] will in each financial year during the Term pay at least the annual Minimum Royalty in accordance with Clause 8.6."

Clause 8.6 "For the avoidance of doubt, [Alaska's] obligation in respect of payment of royalties due to [Virgin] in each financial year of [Alaska] is to pay the greater of (a) a royalty based on a percentage of [Alaska's] Gross Sales in

Case 4:25-cv-10864-JST Document 36-8 Filed 04/27/26 Page 4 of 5
the relevant period, at the rates set out in Clauses 8.1 and 8.3 above, and (b) the Minimum Royalty payment applicable for that period...”

Alaska argued that clause 3.7 expressly provides that it can at any time operate without using the Virgin brand and can do so without paying royalties. In such circumstances, where it is not obliged to pay royalties, it would be a bizarre interpretation (Alaska asserted) for it nevertheless to have to pay minimum royalties. The difficulty for Alaska with such a line is that it rather overlooks clause 3.6 and the obligations there set out to use the Virgin brand, to which Alaska’s response was that clause 3.6 was trumped by the opening words of clause 3.7.

Evidence demonstrated that clause 3.7 was included in response to a U.S. Department of Transport requirement that Virgin America should be entitled to operate free of the control of the Virgin group (based outside of the U.S.), including being able to operate without using the Virgin brand on a royalty-free basis. That requirement would be undermined, Alaska contended, if, in operating without using the Virgin brand, it had to pay the equivalent of 80% of the royalties (as of 2013), which would have been payable if it had used the brand.

The Court of Appeal disagreed, finding that “the language of the Licence, the factual matrix and commercial considerations all point firmly to Virgin being entitled to at least the Minimum Royalty in exchange for the rights Alaska holds for the remainder of the term of the Licence.”

A key point here is that Alaska had no right to terminate the licence, but in any event, a minimum royalty payment is not commercial nonsense when considered as a payment to keep open the possibility of using (and in the Court’s words “sterilise”) the Virgin brand at any time during the remainder of the 25 year licence. Furthermore, “it is plainly of value to Alaska that the well-known Virgin Brand should not be used by one of its competitors in the US airline marketplace.”

Further, the court held that even if there were commercial oddities on a literal interpretation, such commercial oddities carried less weight in contractual interpretation where “the Licence ... is a professionally drawn contract between commercial parties. That is all the more so in circumstances where the parties knew and intended (i) that its terms would be reviewed and had to satisfy a regulator and (ii) a third party might well acquire or merge with Virgin America and assume its rights and obligations under the Licence.”

What could a party in Alaska Airlines’ position have done differently to avoid this ongoing obligation to pay minimum royalties?

- At the time of the merger, carefully check all licence and other on-going agreements and ensure that they are fully aware of the consequences of taking on those agreements, particularly if they are going to materially change the operational arrangements of the target company.
- Consider whether prior to completion there are options to terminate the licence if access to the licensed rights is no longer required. If not, consider whether the licensor will agree how the agreement should be interpreted if there is a lack of clarity, or if there is the possibility to buy-out the licensor's rights. It is not always possible for the potential acquirer to have such discussions, particularly if the deal is subject to confidentiality terms, but it might be possible for a target company to do so.
- Obtain indemnities from the vendor. This may not be an option in a straight merger situation.

What happened behind the scenes when the Virgin America and Alaska Airlines merger was being negotiated does not form part of the judgment. It may be that at that time Alaska Airlines took, or attempted to take, all these actions, but in the end given the commercial upsides outweighed went ahead fully aware of the risk of having to pay these ongoing minimum royalty payments. Sometimes it is necessary just to take a punt, but what should not be necessary is to take a punt in ignorance of the risks through a failure to fully think through the impact of ongoing contractual obligations.

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Subscribe

Exhibit 9

Letters of Support From
Former PBCC Members

DECLARATION OF BRADEN SIMMONS

I, Braden Simmons, a resident of Auckland, New Zealand, declare as follows:

1. I was excommunicated from the Plymouth Brethren Christian Church (PBCC) in 2019 after raising objections about its leadership.
2. I have been a supporter of the *Get A Life* (GAL) podcast since its first episode in 2022. The podcast has provided a platform for former members of the PBCC to share their experiences, many of which relate to coercion, social isolation, and loss of identity following departure from the church.
3. Listening to the podcast has contributed to my understanding of my own experiences and those of others in similar circumstances. More significantly, it has contributed to establishing a community of former members, allowing myself and others to understand and express our stories with confidence and support.
4. I have personally participated in the podcast, appearing on Episode 11 in December 2022 to share my experience.
5. At that time, a business affiliated with the PBCC leadership was litigating me in New Zealand over allegedly accessing confidential church information. On 20 December 2022, shortly after Episode 11 was published, the PBCC-affiliated parties offered to settle the proceedings. I did not accept that offer, but it helps to illustrate the important role of the *Get A Life* platform.
6. Among the most significant episodes to date, in my view, is Episode 94, in which my father, Stephen Simmons, described how he and other trustees were coerced into providing lucrative contracts to businesses connected to PBCC leadership.
7. I consider that the podcast serves an important role in enabling former members to process their experiences, understand the impact of their time in the PBCC, and reintegrate into wider society.

8. I am concerned that removing the Get A Life podcasts, or constraining their freedom to publish in the name of copyright, would be both unjust in the narrow sense, and detrimental to the wider cause of educating society about high-control groups and the harms they inflict.
9. It is illustrative that the television series *Unchosen*, which is based on the PBCC and parallels the lived experiences of many guests on the Get a Life podcast, is currently a top-rated show on the video streaming platform Netflix.

I swear this under penalty of perjury under the laws of the United States.

Dated 27 April 2026

Signed  _____

Braden Simmons

Auckland, New Zealand

26th April 2026

I, Andrea Lee MacKinnon, want to make a statement about how the Youtube Get A Life Podcast videos have personally saved my life.

I was your typical PBCC wife, married with children, stay at home mom and not allowed to work. My situation was even more unique in the fact that I had relocated to Germany from Canada upon marrying as you do in the brethren - you must move to where the husband lives.

About 12 years into my marriage, after trying everything that was available to me in the PBCC help-wise, it was clear that my mental health issues, depression, isolation, and suicidal thoughts weren't caused by my marriage or living in another country with another language. But I couldn't figure out what it was!

Searching on the internet one day I came across the Youtube Get A Life Podcast page, and it was like discovering a gold mine of information - true stories and accounts from people who had left the PBCC with varying experiences. It became very clear to me upon watching these videos that it was my circumstances and being part of the PBCC that was causing my deep unhappiness and despair.

Watching the podcasts, being hooked on every episode that came out, seeing the courage that others had to break free of the PBCC and hearing their similar emotions as to how I felt trapped, and the exposure of what really goes on inside the PBCC was mind-blowing. It confirmed that many many things that I had seen, heard and personally experienced were not normal in every day life and were signs of a dangerous high control religious group. It also confirmed to me that I wasn't crazy, I wasn't mentally ill, I wasn't unhappy with myself, my marriage or my children - it was my environment. It was stifling me, slowly killing me, and it would eventually kill me if I didn't get out. It opened my eyes to the fact there was another way to live, and a safe way to make it happen.

The MAIN REASON that I am where I am today, still alive, not depressed, not in a mental clinic, free, happily still married with my husband, with our two children and a fulfilling life, is because of the Get A Life Podcast videos.

I didn't have to end my life to end my suffering, I was able to gain freedom!

They are an absolute indispensable wealth of stories and accounts of people who previously had no safe space to share their stories. Each single one of the podcasts helped me towards leaving and still help me today.

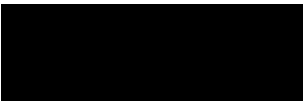
The podcasts saved my life. I've said it many times to Cheryl Hope and anyone who asks my story, and I will keep saying it.

I also have done two podcasts on Get A Life sharing my story, with the sole goal of helping others who may also feel trapped in a similar way to the way I felt. This has resulted in countless people reaching out to me, telling me their stories and how my podcasts have helped them. Some have already left, some are in the process of leaving, and some just beginning to question leaving. They are of all gender and age, which proves each podcast resonates with every single person still in the PBCC and feeling trapped.

If the podcasts were to get taken down, the most accurate and valuable source of help to those still in the PBCC would be lost and would inevitably result in many people desperate to leave without all that information and accounts, which are crucial to them leaving.

I swear this under penalty of perjury under the laws of the United States.

Andrea Lee MacKinnon



4/27/26, 8:09 AM

(76) Inbox | info.getalife@proton.me | Proton Mail

Getalife YouTube

From [REDACTED]

To [REDACTED] info.getalife@proton.me

Date Monday, April 27th, 2026 at 1:51 AM

To whom it may concern,

My name is Ben Woodbury, and I am writing to share the impact that the Getalife YouTube channel has had on my life after leaving a high-control religious environment.

As a gay man, leaving was not simply about stepping away from a belief system. It meant trying to rebuild an identity that had been suppressed and shaped by fear for most of my life. When I first left, I struggled deeply with self-worth, shame, and a lack of understanding of who I was outside of that environment. I felt isolated, disconnected, and unequipped to function socially in a way that felt authentic.

For years after leaving, I carried confusion about what I had experienced, particularly in relation to my sexuality. There was very little language or support available to help me process it, which made integrating into broader society and forming genuine relationships incredibly difficult.

I only discovered the Getalife YouTube channel a few years after leaving, and I can say without hesitation that the Getalife YouTube channel has had a profoundly positive and meaningful impact on my life. Being able to see and hear others share experiences similar to my own created a level of understanding and validation that I had not found anywhere else.

Through their content, I was able to better understand the environment I came from, including the control, expectations, and long-term emotional effects it had on me. Hearing others speak openly about these experiences helped reduce the shame and confusion I had carried for years, and made me realise I was not alone.

As a gay man, this has been especially important. The suppression of my identity had lasting effects on my confidence and sense of self. The Getalife YouTube channel helped me begin to unpack that in a way that felt safe and grounded in shared experience. They

4/27/26, 8:09 AM

(76) Inbox | info.getalife@proton.me | Proton Mail

gave me language for things I had never been able to articulate and helped me rebuild a sense of identity that felt like my own.

Socially, the impact has been significant. The content has helped bridge the gap between isolation and connection. It has allowed me to engage more confidently with others, feel less alone, and better understand how to exist outside of that environment in a healthy and authentic way.

I can only imagine how different my early years after leaving may have been if I had come across this content sooner. Even discovering it later, it has still had a deeply positive and lasting impact on my life in so many ways.

The Getalife YouTube channel is not just content, it is a critical platform for connection, education, and recovery for people like myself. Losing access to it would remove an important and often rare source of support for those navigating similar experiences.

I swear this under penalty of perjury under the laws of the United States

Regards

Ben Woodbury

Declaration of Dan Waskey

From Daniel Waskey [REDACTED]
To [REDACTED] info.getalife@proton.me
Date Sunday, April 26th, 2026 at 5:45 PM

I, Daniel Waskey, being over the age of 18 and competent to testify to the matters stated below, declare as follows:

I was born and raised inside the highly controlled religious group called the Plymouth Brethren Christian Church. Every relationship I had — family, friends, mentors, the people I worshipped with and worked alongside — existed inside that fellowship. I left on March 7, 2024.

Long before I found the courage to leave, the Get A Life podcast was a lifeline for me to the world outside.

I grew courage to change through the podcast's stories of people who have left the Plymouth Brethren Christian Church — how they were shunned by their own families, siblings, spouses, and lifelong friends; how they rebuilt their lives in different parts of the country and the world; how they navigated work, relationships, faith, and ordinary daily life after walking away from the only community they had ever known.

While I was still inside the fellowship, going through the motions of a life that no longer fit me, I watched and listened to those episodes in private - knowing that if I was caught, I would be in trouble from the elders immediately.

I want to be clear about how I used the Get A Life podcast before I left, because I believe this goes directly to the heart of why this content matters. I was not consuming it for entertainment. I was using it to mentally prepare myself for what I knew was coming. I knew that if I left, my family would shun me. I knew lifelong friendships would end overnight. I knew I would walk out into a society I had been taught my entire life to fear. The podcast let me hear, in their own words, from people who had already walked that road. It let me see how they had survived, what they had lost, what they had rebuilt, and what the early months and years on the outside actually looked like. Episode by episode, I built a mental map of a future I could not otherwise picture.

Without that, I do not believe I would have found the strength to leave the cult. I would have stayed in a life that was killing me spiritually because the unknown on the other side would have been too terrifying to face alone.

Those podcasts also gave me an understanding for things I had never been allowed to know before. They gave me a comprehension of spiritual abuse, coercive control, and shunning, and a framework for understanding what had been done to me and to the people I loved.

It educated me, in plain and human terms, that what I was experiencing was real and that other people had survived it. For the first time in my life, I understood that I was not crazy and I was not the problem.

When I finally fled in March, 2024, the consequences were exactly what the Get A Life podcast had prepared me to expect.

My family cut me off. Lifelong friends — people I had grown up with, worshipped with, and shared every meaningful moment of my life with — disappeared overnight. The shunning was total. There were no goodbyes, no closure, no

4/26/26, 5:48 PM

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acknowledgment that I had ever existed inside that community. Because of the podcast, I recognized what was happening to me. I had heard it described before.

The Get A Life podcast has continued to be a lifeline in every season since I left. In the early days it helped me grieve the losses without feeling alone.

As time went on it gave me models of people further down the road — people who had rebuilt families, careers, friendships, and a relationship with God outside the fellowship. Hearing leavers from around the world describe how they integrated into ordinary society — how they made friends outside the assembly, how they navigated workplaces and dating and civic life, how they raised children in a world they had been raised to fear — has done work that no single therapist, pastor, or friend could have done on their own.

It rebuilt a sense of self-worth and identity that the Plymouth Brethren Christian Church had spent more than thirty years systematically dismantling.

The Get A Life podcast is not entertainment. It is not opinion content.

For people leaving the Plymouth Brethren Christian Church, it is survival material. It is a meaningful part of the reason I had the strength to leave, the reason I survived the shunning that followed, and the reason I am able today to live as a healthy, contributing member of the broader society I was raised to fear.

I swear this under penalty of perjury under the laws of the United States.

Daniel Waskey

Date: 4-26-2026

Dan Waskey


April 26, 2026

The YouTube Channel Get A Life Podcast video episodes have helped me heal from the isolation created by leaving the Plymouth Brethren Christian Church. I only knew two outside people personally when I left the church. Leaving the church created a social void in my life, one that caused great mental anguish. Finding these videos helped me realize I wasn't alone. Other people were out there who had done the same thing as me and made it. Listening to a podcast is one thing but being able to see people as they tell their stories makes it so much more real and has been a great help to me. The videos were also helpful in coming to accept who I am and who I love. In the Plymouth Brethren Christian Church being attracted to the same sex is viewed as a grave sin. Seeing podcast episodes with other people from the 2SLGBTQ+ community helped me love and accept myself.

I swear this under penalty of perjury under the laws of the United States.

Joelle Green

Joelle Green

Since I left the Plymouth Brethren Christian Church, I have watched many videos from the Get a Life Youtube Channel. They greatly helped me process some of the traumas I endured during my time in the church. The experiences we shared as members of the same church are impossible to fully explain to someone who has never been through it, and that is extremely isolating. Watching people describe how they surpassed challenges similar to my own, and seeing how they are thriving and leading fulfilling lives gave me hope when I needed it most. Losing this resource would be a blow to many people who are alone out there needing the hope that this Youtube channel gave me.

I swear this under penalty of perjury under the laws of the United States.

Melinda Zyanne McHaffie

Zy McHaffie



April 27, 2026

To Whom it may concern,

As a psychologist and Director of the Olive Leaf Network, I have witnessed firsthand and researched the profound psychological isolation experienced by survivors of closed, authoritarian environments. My community needs-assessment, which was presented at the International Cultic Studies Association (2024) and involved 76 second- and multi-generational survivors of cultic groups, highlights a demographic that is often invisible rather than just marginalized. For many, the transition into society is marred by intense shame, identity fragmentation, and the belief that they are "the only ones." This is supported by our findings: 96.1% of born-in survivors reported an adverse impact on their sense of self, and 88.2% reported suffering from significant shame.

The *Get a Life* podcast, hosted by Cheryl Bawtinheimer, serves as a vital clinical resource. By providing a platform for shared narratives, the podcast facilitates normalization—a critical stage in trauma recovery. This normalization is essential, given that 67.61% of survivors who participated in the study (from a range of cultic groups, excluding the PBCC) had an Adverse Childhood Experience (ACE) score of 6 or higher, indicating extreme developmental trauma.

The podcast offers survivors "no-cost psychoeducation" (which is not a replacement for psychotherapy) by featuring experts who provide insights that are often inaccessible elsewhere. Access to such resources is paramount because:

- 63.2% of born-in survivors report struggling with mental illness, compared to roughly 22–23% in the general population.
- 38.2% have experienced suicidal ideation, which is significantly higher than the general population rates in Australia (16.7%).
- Financial constraints remain the most reported barrier to accessing traditional professional treatment.

To silence a survivor's voice under the guise of organizational interests sets a dangerous precedent—one that prioritizes institutional reputation over the fundamental healing and human rights of the individual. Our research shows that social support and connecting with other survivors are among the most beneficial aspects of a healing journey. As a clinician, I believe that we must protect these spaces of integration, connection, and truth-telling.

I swear this under the penalty of perjury under the laws of the United States.

Maria Esguerra

A handwritten signature in black ink, appearing to read "Maria Esguerra".

Psychologist – Behaviour Support Practitioner (Advanced)
Member of the Behaviour Support Practitioners Australia (BSPA)
Member of the Australian Association of Psychologist Inc. (AAPi)

4/27/26, 8:09 AM

(2984) Inbox | [REDACTED] Proton Mail

Re: YouTube, Get A Life Podcast

From Martin Farncombe [REDACTED]

To [REDACTED]

Date Monday, April 27th, 2026 at 4:29 AM

Dear Cheryl,

I would like to begin by thanking you and the team for the work you've done over the years with the YouTube *Get A Life* podcasts.

I left the PBCC, who's umbrella covers the Rapid Relief Team (RRT), a few years ago. I saw an opportunity to leave I took it. but I was unprepared for what life would be like afterward—and for how I would be treated.

From that day on, I lost contact with my sister, who had been my best friend. My parents would not allow me to visit, telling me, "Sorry, son, but you know the position." I loved them dearly. In the years that followed, I also lost my wife, my home, my job, and—tragically—my only son at the age of two.

Starting a new life outside the group, among people I had been taught to distrust, was incredibly difficult. For many years I struggled alone, trying to rebuild while dealing with depression and a deep sense of worthlessness—feelings I still contend with today.

Then one day I stumbled across a YouTube podcast called Get A Life. It opened a completely new world to me, I didn't feel so alone. I heard stories from others who had left and faced similar experiences—sometimes even more difficult than my own.

These podcasts have helped me more than anything else, both mentally and emotionally. They've given me insight, perspective, and practical ways to cope. They continue to be a vital source of support.

Even now, several years after leaving the PBCC, when I begin to struggle, I turn to YouTube *Get A Life* to help steady myself. I always look forward to new episodes.

I swear this under penalty of perjury under the laws of the United States.

4/27/26, 8:09 AM

(2984) Inbox | [REDACTED] Proton Mail

Martin Farncombe

Ross Turner



Taking part in the YouTube Get a Life podcast, co-founded by Cheryl Bawtinheimer, has had a meaningful impact on me. Being given the space to share my story openly allowed me to release things I had been carrying for a long time, and in doing so, it helped ease some of the trauma I've experienced. Speaking about it out loud brought a sense of clarity and relief that I hadn't fully felt before.

Equally important has been listening to other people's stories. Hearing their experiences and recognising similarities with my own made me feel less alone and more understood. It created a sense of connection and reassurance, reminding me that others have faced similar challenges and found ways to move forward. Overall, the podcast has been a powerful part of my healing process, both in sharing and in listening.

I swear this under penalty of perjury under the laws of the United States.

Ross Turner

26th April 2026

The Get A Life youtube podcast has been profoundly important in my transition out of the Plymouth Brethren Christian Church as a recent leaver. Leaving the church meant losing not only a belief system, but also my sense of identity, community, and understanding of the world. The podcast provided something I did not have access to otherwise: honest, relatable accounts from people who had experienced the same environment and successfully navigated life outside of it.


Hearing others share their stories helped me make sense of my own experiences. It gave me language for things I had struggled to articulate, and validated feelings I had previously dismissed or been taught to suppress. The podcast also played a critical role in rebuilding my sense of self-worth, as it challenged many of the negative beliefs I had internalised about myself and the outside world.

Socially, the impact has been significant. It helped me feel less isolated and more connected to a broader community of people who understand the unique challenges of leaving the church. This sense of connection made it easier to begin integrating into wider society, as I felt less alone and more confident in forming new relationships and perspectives.

Additionally, the podcast has been important in correcting misinformation that I had been taught. It provided balanced, real-world perspectives that helped me critically evaluate what I had previously accepted as truth, which has been essential in my personal growth and adjustment.

Overall, the Get A Life Podcast has been a key resource in helping me rebuild my identity, understand my past, and move forward in a healthier and more informed way.

I swear this under penalty of perjury under the laws of the United States

 27/04/2026

Lavinia Richardson – Australia

26th April 2026

I am writing to provide a statement in support of the YouTube Get A Life podcast and its importance to me personally.

The YouTube Get A Life podcast has played a significant role in my healing and personal development after leaving the Plymouth Brethren Christian Church (PBCC). Listening to and participating in the podcast gave me a sense of hope that meaningful change could occur in addressing the harm and erosion of human rights within the group.

For a long time, I lived under a culture of silence and control. Speaking out through the YouTube Get A Life podcast allowed me to begin shedding those constraints. It gave me the courage to process my experiences openly, which has been an essential part of my healing journey and in rebuilding my sense of self-worth and identity.

The podcast has also connected me with a broader network of people who have had similar experiences. This sense of community and understanding has been invaluable. It has helped me integrate more confidently into life outside the PBCC, knowing I am not alone and that others understand what I have been through.

Without the YouTube Get A Life podcast, I do not believe I would have had access to the same level of support, validation, and encouragement to move forward in a healthy and constructive way.

I swear this under penalty of perjury under the laws of the United States.

Kind regards,

A handwritten signature in black ink, appearing to read 'Cassie Davies', with a long horizontal flourish extending to the right.

Cassie Davies

**DECLARATION OF STEPHEN SIMMONS
IN SUPPORT OF THE PUBLIC INTEREST AND VALUE OF THE “GET A LIFE” PODCAST**

I, **Stephen Simmons**, declare as follows:

1. I am a resident of Auckland, New Zealand. I am over the age of eighteen and competent to make this declaration. The matters stated herein are based on my personal knowledge and experience.
2. I was shunned by the **Plymouth Brethren Christian Church (PBCC)** in February 2020, shortly before my sixtieth birthday. In 2022, I was formally excommunicated from the PBCC.
3. As a direct consequence of my exclusion, my wife divorced me. Four of my six children have refused all communication with me, as have nearly all of my grandchildren. I was also prohibited from attending the burial services of my elderly father and mother.
4. The stated reason for my expulsion was that I raised serious concerns regarding **fraudulent practices and the cruel mistreatment of church members by PBCC leadership**. In my experience, questioning or exposing leadership conduct is not tolerated within the PBCC.
5. Since my expulsion, I have appeared as a guest on the **Get a Life** podcast on YouTube on five or six occasions. My purpose in doing so has been to truthfully describe my experiences and to expose hypocrisy, deceit, financial misconduct, and psychological—and in some cases sexual—abuse that, in my observation, occurs within the upper hierarchy of the PBCC.
6. The Get a Life podcasts perform a **vital public service**. Like many high-control religious groups, the PBCC conditions its members to believe that their organization alone represents truth and that its leader is beyond question. In such circumstances, external scrutiny and public exposure are essential both for accountability and for the protection of current and former members.
7. Despite official prohibitions and the threat of severe discipline, **many PBCC members view the Get a Life podcasts** through YouTube and other media. I am aware, through direct communications, that these programs have prompted members to re-examine leadership claims and practices and, in some cases, to recognize misconduct that had previously been concealed from them.
8. The impact of the Get a Life podcasts on the PBCC has been significant and disproportionate to their size. Both ordinary members and senior leadership are aware of the programs. In response, the PBCC has made various **superficial changes aimed at improving its public image**, which I understand to be a direct reaction to issues raised on the podcast.
9. The podcasts have also drawn the attention of **external authorities**, including charity regulators, taxation departments, and education authorities. Based on information publicly disclosed, it is likely that investigations by the Australian Taxation Office into multiple PBCC-related business entities were prompted, at least in part, by matters revealed through the Get a Life podcasts. These investigations reportedly resulted in the closure of at least two PBCC-controlled accountancy businesses and the repayment of millions of dollars to the Australian government.

10. In my opinion, grounded in my personal experience and direct observations, the work carried out by **Cheryl Bawtinheimer and Richard Marsh** through the Get a Life podcast is not only valuable but **essential**. Their reporting and commentary give a voice to individuals who have been silenced, deter serious misconduct, and serve a clear public-interest function.

11. For these reasons, I believe that the Get a Life podcast deserves strong legal protection as a legitimate exercise of free expression and as a safeguard against abuse, corruption, and coercive practices within powerful organizations.

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

Executed on: 27 April 2026

Location: Auckland, New Zealand

Stephen Simmons

A handwritten signature in black ink, appearing to read "Stephen Simmons", written in a cursive style.

27 April 2026

I am Peter Hart from New Zealand. I became aware of the YouTube Get a Life podcast and asked to tell my story as a recent leaver from the Exclusive Brethren/PBCC. There were several reasons for this: Firstly, I wanted my true story to be told, as leavers are often falsely accused and maligned to those still inside, especially my immediate family. Secondly, it was a message to insiders about the wrongness of the leader and the system.

These aspects were very important for me; it helped me to feel that the PBCC no longer had me trapped, and that my sacrifices of losing almost everything were not in vain. It helped me to regain some self-esteem and identify who I was and who I could be going forward. The Get a Life Team were an important role in my recovery to normality and to society, and I have gone back and watched the video on YouTube a few times to remind me of how far I have come.

I swear this under penalty of perjury under the laws of the United States of America.



Peter Hart

I, Jacqueline Ruth Hart declare as follows:

1. Background and Involvement

I became involved with the YouTube channel and podcast series commonly known as the “Get-A-Life” podcasts for the purpose of providing a public platform for individuals who have left or survived involvement in the Plymouth Brethren Christian Church (PBCC) to share their lived experiences in their own words.

2. Purpose of the Platform

My involvement was motivated by a belief that it is important for the experiences of former members and survivors of the PBCC to be documented and made accessible in a single, organised forum. The You Tube Get-A-Life podcasts serve as a consolidated repository of personal testimony, allowing these individual accounts to be preserved and referenced collectively.

3. Public Education and Understanding

The documentation of these stories provides an important resource for individuals, families, researchers, legal professionals, and members of the public who wish to better understand what can occur when a person leaves the PBCC. These recorded accounts help illustrate the emotional, social, psychological, and practical impacts that former members report experiencing as a result of their involvement with, and departure from, the PBCC.

4. Supportive and Safe Environment

Participants who have chosen to tell their stories through the You Tube Get-A-Life podcasts that I have hosted, have told me that the opportunity to speak openly in this setting has been cathartic and beneficial to them. They have expressed that the podcasts feel like a safe and respectful space for individuals to recount their experiences without coercion or manipulation. After speaking publicly of their journey of leaving the brethren, the feedback I have received is that they feel liberated as they now know the public will be more aware of the harm totalitarian groups can do.

5. Preservation of Truthful Accounts

I believe it is important for the truth of individuals’ personal stories to be documented accurately and preserved. The You Tube Get-A-Life podcasts provide a single, identifiable platform where these narratives can be recorded and made available, ensuring that such accounts are not fragmented, lost, or misrepresented.

6. No Malicious Intent

My involvement with the You Tube Get-A-Life podcasts is not undertaken with malice, harassment, or intent to defame. Rather, it is grounded in the principles of free

expression, public awareness, historical documentation, and support for individuals sharing their own lived experiences.

7. Personal Knowledge

The statements made herein are based upon my personal knowledge, involvement, and understanding of the purpose and function of the You Tube Get-A-Life podcasts and the feedback received from participants.

Declaration Under Penalty of Perjury

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

Executed on this 27th day of April 2026

Jacqueline Ruth Hart

Declarant



Christchurch, 27 April 2026

TO WHOM IT MAY CONCERN

As an international investigative cult journalist, author of the HarperCollins bestseller *Cult Trip* and organiser of the Decult conference in New Zealand, I regard the “Get a Life” podcast channel on YouTube as an invaluable resource to understand and gain insight into the Exclusive Brethren/PBCC.

Our first cult awareness conference had former Brethren member and *Excommunicated* author Craig Hoyle in a session with former Brethren member Lindy Jacomb from the Olive Leaf Network. As the convenor of this inaugural event in New Zealand, the “Get A Life” YouTube podcast helped me in preparation for our event to understand why the voices of ex-members of the Plymouth Brethren Christian Church matter so much in the field of recovery from high-control religious groups.

Especially for journalists, educators and victim advocates like me, this survivor-focussed independent platform is critical for informing our research as professionals, as well as the wider public. I highly recommend “Get A Life” to anyone studying, featuring or researching the Exclusive Brethren/PBCC. It’s a vital resource.

Yours sincerely,

A handwritten signature in black ink that reads "Anke Richter".

Anke Richter
DECULT founder/director
www.ankerichter.net

Exhibit 10

Email from YouTube
January 29, 2026

Re: [J7HK4OZ6EODUAR3O2EXJP6UXDM] New copyright counter notification

From YouTube Copyright <youtube-disputes+1qmia085rgn5g0h@google.com>

To info.getalife@proton.me

Date Thursday, January 29th, 2026 at 10:30 PM



Dear Get A Life Podcast,

Thank you for your counter notification. Unfortunately, it's unclear to us whether you have a valid reason for filing a counter notification, so we won't be able to honour your request.

Counter notifications are only used when content has been removed as a result of mistake or misidentification. This includes a belief that your content is covered by copyright limitations or exceptions, such as fair use, fair dealing or uses for the purposes of quotation, criticism, review, caricature, parody or pastiche. Bear in mind that using this process may result in the claimant commencing legal action against you for copyright infringement, so you may wish to evaluate your legal position before filing a counter notification.

What you can do now

- Ask the copyright holder for a [retraction](#) or simply wait for your [strike to expire](#).
- If you are sure that your video has been misidentified as infringing and are willing to possibly defend the action brought against you by the copyright holder, you can [resubmit your counter notification](#). Make sure that you explain in detail how you have all the necessary rights to the video's content.

If you don't know or want more information about copyright, [visit our Help Centre](#). You may also wish to seek legal advice to determine if your video infringes someone else's copyright.

- The YouTube Team

Counter notification as follows:

Videos included in counter notification:

- <http://www.youtube.com/watch?v=yUeq9k97hno>

Display name of uploader: Get A Life Podcast

I am submitting this counter notification in response to a copyright takedown request submitted by Rapid Relief Team (RRT) Limited. The takedown notice does not clearly

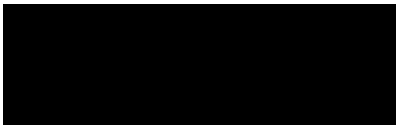
identify the specific copyrighted work allegedly infringed, nor does it specify which portion of the video is claimed to be infringing, beyond naming the claimant. As a result, I believe the removal was based on mistake or misidentification. The removed video(s) consist of commentary, criticism, reporting, and analysis of a matter of public interest. Any copyrighted material referenced, including logos or images, was used in a limited, non-substitutive, and transformative manner for the purpose of criticism, commentary, and reporting, consistent with fair use principles. I have a good-faith belief that the material was removed as a result of mistake or misidentification of the material alleged to be infringing. I declare under penalty of perjury that the information in this counter notification is accurate. I consent to the jurisdiction of the Federal District Court for the judicial district in which my address is located, or if outside the United States, the United States District Court for the Northern District of California, and I will accept service of process from the claimant. Full legal name: Cheryl Bawtinheimer Channel: Get A Life Podcast Email: info.getalife@proton.me

I swear, under penalty of perjury, that I have a good-faith belief that the material was removed due to a mistake or misidentification of the material to be removed or disabled.

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

Cheryl Bawtinheimer

Cheryl Bawtinheimer



info.getalife@proton.me



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