

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)
JONATHAN MONSARRAT,)
)
<i>Plaintiff,</i>)
)
v.)
)
BRIAN ZAIGER dba)
ENCYCLOPEDIADRAMATICA.SE,)
)
<i>Defendant.</i>)
_____)

CIVIL ACTION NO. 17-cv-10356-PBS

Leave granted October 24, 2017

FIRST AMENDED COMPLAINT

Plaintiff by and through his counsel on personal knowledge as to his own actions and on information and belief as to the actions and motivations of the Defendant hereby alleges as his First Amended Complaint the following;

INTRODUCTION and BACKGROUND

1. Plaintiff Jonathan Monsarrat resides in Cambridge, Massachusetts. He holds a Bachelor of Science degree in Electrical Engineering and Computer Science from the Massachusetts Institute of Technology and an Master’s Degree in Business Administration from MIT’s Sloan School of Management. Mr. Monsarrat is a video game entrepreneur developing an internet interactive video game that will be marketed to young people including teenagers of both sexes. He brings this copyright infringement action because without his consent and without right his copyrights have been copied and altered to maliciously and falsely label him a pedophile who uses hidden images or memes on the internet to lure young girls to be victimized by him.

2. At the MIT graduation on June 2, 2000 the Plaintiff was a volunteer/performer/guide dressed in a MIT mascot beaver costume featuring a white sweater/tee shirt with MIT on the front; at his request and direction an unknown passerby using the Plaintiff's camera took a photo of the Plaintiff on the campus, wearing the MIT mascot beaver costume, posing with a young man and two very young girls, upon information and belief, a young father and his two young daughters. The Plaintiff composed the scene in which wearing the MIT beaver mascot costume he posed with the older of the two young girls to his right and the father kneeling to his left with the younger of the two girls perched on his left knee. After taking the photo the unknown passerby returned the camera to the Plaintiff. Exhibit A is a copy of Plaintiff's June 2, 2000 photograph.

3. In or about June 2000 Plaintiff first published his June 2, 2000 photograph on his personal MIT student webpage hosted by MIT on the MIT website.

4. Plaintiff is the photographer and registered owner of the copyright of this June 2, 2000 MIT beaver costume photograph. On February 15, 2011, Plaintiff registered his copyright of his MIT beaver costume photo. Exhibit A. US Copyright Office Copyright # VAu001058248.

5. Plaintiff is also the author and/or photographer and registered owner and the holder of certificates of registration issued by the United States Copyright Office for each of the following five copyrighted works:

- a. Literary work consisting of text sent from account "mitcarpediem".
US Copyright Office Registration No. TXu001816801 dated August 16, 2012;
- b. Literary work starting "Hey! Let" and ending "?Ciao, bella!".
US Copyright Office Registration No. TXu001823216 dated August 16, 2012;

c. Literary work starting "I'm laughing?" US Copyright Office Registration No. TXu001816802 dated February 15, 2011;

d. Visual material "Websites of Jonathan Monsarrat." US Copyright Office Registration No. VA0001876289 dated May 20, 2013; this consisted of a collection of photographs taken by the Plaintiff and posted on one or more of Plaintiff's websites between 2000 and 2013; and,

e. Plaintiff is the photographer and registered owner of a photograph of himself wearing a collared, button shirt, smiling, standing by a tree lined roadway with a road sign in the background. US Copyright Office Copyright # VAu001058249, upon information and belief pursuant to registration dated February 15, 2011.

6. According to Wikipedia, https://en.wikipedia.org/wiki/Encyclopedia_Dramatica, the website Encyclopedia Dramatica "is a satirical website" originally launched in 2004 and with attribution to journalist [and attorney] Julian Dibbell:

Journalist Julian Dibbell described Encyclopædia Dramatica as the site "where the vast parallel universe of Anonymous in-jokes, catchphrases, and obsessions is lovingly annotated, and you will discover an elaborate trolling culture: Flamingly racist and sexist content lurks throughout, all of it calculated to offend." [An Australian website, Nine.com.au] described Encyclopædia Dramatica as: "Wikipedia's evil twin. It's a site where almost every article is biased, offensive, unsourced, and without the faintest trace of political correctness. A search through its archives will reveal animated images of people committing suicide, articles glorifying extreme racism and sexism, and a seemingly endless supply of twisted, shocking views on just about every major human tragedy in history.

7. Sometime in or about 2008 some anonymous user of the Encyclopedia Dramatica website posted a piece:

“Meet jonmon!

Jonathan Monsarrat, known as jonmon ... at MIT, make_you_laugh on OKCupid and Known as a total idiot the world over, is the world’s most sexually desperate man. At the age of 38, he chases 16 year old girls in the hope of curing his virginity.”

Alongside the “Meet jonmon!” paragraph are two photos, one atop the other each bearing a caption.

The first photo is of against a background of some treelined roadway and with an unexplained caption: “ Jon Monsarrat reveals his core problem.” This photo is a photo shopped, altered copy of Plaintiff’s copyrighted photograph. US Copyright Office Copyright # VAu001058249.

The second photo less than one inch directly beneath the first is a photoshopped alteration of Plaintiff’s copyrighted beaver costume photo at the June 2, 2000 MIT graduation; now the beaver has been changed into a bear and MIT tee shirt is now “PDB” tee shirt. Pedo is internet slang for pedophile. Beneath the photoshopped pedobear photo is caption: “Jonmon suits up to express his inner self.” The 2008 image published on the Encyclopedia Dramatica website is Exhibit B.

8. According to Wikipedia, <https://en.wikipedia.org/wiki/Pedo>, the word Pedo is commonly used as slang for “paedophile...;” and Pedobear, <https://en.wikipedia.org/wiki/Pedobear>, “is an Internet meme that ... [a]s the name suggests (“pedo” being short for “pedophile”), it is portrayed as a pedophilic bear. It is a concept used to mock pedophiles or people who have any sexual interest in children or jailbait. The bear image has been likened to bait used to lure children or as a mascot for pedophiles.”

9. At the bottom of this jonmon page posted in 2008 on the Encyclopedia Dramatica website was the following:

How to epically troll this guy

Okay he's got some news articles on him, but we need more. So contact the press to try and get them to write more about him. Enough news articles and there will be a Wikipedia page about his antics.

Additionally, contact Perverted Justice and Chris Hanson to ask them to work their ebephile-busting magic on him and it'll make some more news articles! ... he tries to lure little kids in with his new prank site <http://johnnymonsarrat.com/> http://johnnymonsarrat.com/jon_monsarrat/jonmonsarrat.htm dude, that has all of his emails contact info and anything you ever wanted to troll the sonofabitch

10. "Trolling" is Internet slang that among other things may be characterized as internet postings or online harassment seeking to destroy a person's reputation with hateful and untrue statements, an active campaign of fake news. According to Wikipedia, https://en.wikipedia.org/wiki/Encyclopedia_Dramatica, targets of Encyclopedia Dramatica trolling "come from 'every pocket of the Web,' ... [including] real people... . The material is presented to appear comprehensive, with extensive use of shock-value prose, drawings, photographs, and the like."

11. Upon information and belief as of late 2010 and January 2011, this 2008 posting on the Encyclopedia Dramatica website also included a number of Plaintiff's authored communications and the same "*How to epically troll this guy.*"

12. According to the US Copyright Office as of January 2011 Edrama LLC, a Delaware limited liability company was the registered agent for the Encyclopedia Dramatica website authorized pursuant to the DMCA to receive notice of copyright infringement for materials posted by a user on the Encyclopedia Dramatica website. On or about January 19,

2011, Plaintiff served Encyclopedia Dramatica's DMCA registered agent with a takedown notice which upon information and belief the DMCA agent or administrator for Encyclopedia Dramatica website forwarded to the alleged infringer; and, on February 6, 2011, the legal department of the Encyclopedia Dramatica informed the Plaintiff that it had received a DMCA counter notification, that "ED is a fully DMCA compliant web service," and that if Plaintiff gave notice that he filed an action to restrain the alleged infringement, Encyclopedia Dramatica would not permit the original poster to "restore" the allegedly infringing works pending outcome of the lawsuit.

13. On February 15, 2011, Plaintiff filed an action in this Court, case 1:11-cv-10248-DPW, for copyright infringement against the individual, a New York City resident, who had filed the counter-designation seeking both an injunction and damages for her unauthorized copying and public display of Plaintiff's copyrighted works on, among other places, the Encyclopedia Dramatica website. That same day Plaintiff gave written notice to the legal department of the Encyclopedia Dramatica of his lawsuit action and included copies of the court papers showing he had sought an injunction to restrain infringement. On February 1, 2012, this Court, the Hon. Douglas P. Woodlock presiding, entered a default judgment. A true and accurate copy of the 2012 judgment is Exhibit B to the original March 2, 2017 Complaint.

14. The Defendant Brian Zaiger ("Zaiger" or "Defendant") is an individual residing in Beverly Massachusetts. Upon information and belief, see his Linked In™ profile, <https://www.linkedin.com/in/brian-zaiger-63902554>, from and after April 2011 to the present doing business as EDrama Limited Zaiger has been the website administrator of Encyclopedia Dramatica as well as in charge of the website's staff, social media, advertising and accounting. Upon information and belief at all times material to this infringement action the Defendant Brian

Zaiger has been the owner of the Encyclopedia Dramatica website. Upon information and belief the Defendant Brian Zaiger from time to time has made postings on Encyclopedia Dramatica using various pseudonym user names including “Mantequilla.”

15. According to Defendant’s terms of service, posters to the Encyclopedia Dramatica website grant the website “a perpetual, irrevocable, worldwide, non-exclusive, royalty-free, sublicensable and transferable license” for, among other things, commercial purposes including for promotion of the website owner’s own products as well as “third party products or services.”

16. Upon information and belief at times material to this action, Defendant’s Encyclopedia Dramatica website for some valuable consideration granted rights to one or more porn websites including F__kbook.com™ to post pornographic advertisements on certain Encyclopedia Dramatica web pages.

17. On October 31, 2011, an Encyclopedia Dramatica website user “Mantequilla,” revised the 2008 Jonmon page to read:

“Jonathan Monsarrat, known as jonmon ... at MIT, make_you_laugh on OKCupid and Known as a total idiot the world over, is the world’s most sexually desperate man. At the age of 38, he chases 16 year old girls in the hope of curing his virginity.”

Mantequilla deleted Plaintiff’s copyrighted photograph of himself smiling wearing a button shirt standing alongside a tree lined roadway, but left the caption that had accompanied that photo “Jon Monsarrat reveals his core problem,” to describe the altered copyrighted MIT mascot photograph. At the bottom of the October 31, 2011 Encyclopedia Dramatica “Jonmon” page is an advertisement for F__kbook.com™ with five pornographic images three of which appear to be very young females. Exhibit C is a copy of the October 31, 2011 Encyclopedia Dramatica

page “Jonmon.”

18. At some unknown time the October 31, 2011 Encyclopedia Dramatica “Jonmon” page was taken down; upon information and belief based on Wikipedia, https://en.wikipedia.org/wiki/Encyclopedia_Dramatica#History, on or about March 19, 2012 the entire Encyclopedia Dramatica website was shut down. Upon information and belief Encyclopedia Dramatica went live sometime in 2012 under a new country domain.

19. Upon information and belief based on his May 20, 2017 email to the Plaintiff and a Daily Dot July 5, 2017 reported interview with Zaiger, <https://www.dailydot.com/layer8/encyclopedia-dramatica-copyright-lawsuit/>, it was Zaiger who caused or directed the re-creation of the Encyclopedia Dramatica website by copying one or more versions of the prior Encyclopedia Dramatica content from an Internet archive; and at Zaiger’s direction or authorization the October 31, 2011 Encyclopedia Dramatica page “Jonmon” was copied and reposted on the re-created Encyclopedia Dramatica website.

20. From and after March 2012 without authorization or right the Defendant has used Plaintiff’s copyrighted materials, including an unauthorized photo-shopped alteration of his June 2, 2000 MIT mascot photograph, for commercial purposes including without limitation placement on the same page--falsely accusing the Plaintiff of being a sexual predator of young girls -- of pornographic advertisements for a porn site, F—ckbook.com™, where the visual pornographic images of five naked females engaging in sexually explicit conduct, and upon information and belief the linked videos, including three very young looking females engaging in sexually explicit conduct. Upon information and belief Zaiger arranged for this porn website to place advertisements targeting potential visitors to the porn site who are interested in sexual

exploitation of young girls on those the Encyclopedia Dramatica pages referencing pedophilia or the internet shorthand terms, Pedo and/or Pedobear.

21. According to a search of the United States Copyright Office, at no time material to this infringement action has the Encyclopedia Dramatica website had a designated agent to receive notifications of claimed infringement as required by 17 U.S.C. §512 (c)(2).

22. Defendant's published policy is that neither lawsuits for defamation nor takedown requests under the Digital Millennium Copyright Act can affect his operation of the Encyclopedia Dramatica website.

23. At all times material to this infringement action there is no registered address or identification of a physical location of the Encyclopedia Dramatica website accessible to the public.

24. Upon information and belief, on or about March 21, 2012, Defendant migrated the country domain for the Encyclopedia Dramatica website to Sweden.

25. From and after obtaining a top country domain registration of his domain name Encyclopedia Dramatica in Sweden in 2012, subsequently in Romania and most recently Serbia, Zaiger has used different anonymous acronyms to conceal his identity as the owner of the Encyclopedia Dramatica website and none of Defendant's publicly accessible domain registration records disclose any email or physical address for any one or more of "Admin contact," "Technical contact," or "Billing contact" for the Encyclopedia Dramatica website. See Exhibit C to the March 2, 2017 Complaint (Whois registration record for encyclopediadramatica.se and IP Address 104.25.57.111, and Domain Report for

encyclopediadramatica.se).

26. Upon information and belief the Encyclopedia Dramatica October 31, 2011 “jonmon” page with the targeted F__ckbook™ advertisement, Exhibit C, was back up on the Encyclopedia Dramatica website as of October 22, 2012.

27. In January 2013, Plaintiff transmitted a DMCA takedown notice complaining of Encyclopedia Dramatica’s unauthorized use of, among other things, Plaintiff’s copyrighted June 2000 MIT mascot photograph to Defendant’s then domain registrar 101 Domain, Inc. in California. Upon information and belief Defendant had actual notice of this January 2013 takedown demand.

28. Exhibit D is a copy of the jonmon page featuring the same altered photoshopped MIT mascot costume without any caption with the same targeted F__ckbook™ advertisement advertisement that upon information and belief appeared on the Encyclopedia Dramatica website as of May 11, 2013.

29. Later in May 2013 Plaintiff caused a takedown demand to be transmitted to Defendant’s then Romanian agent complaining of false allegations that the Plaintiff had committed criminal offenses and complaining of the use, without authorization or right, of Plaintiff’s copyrighted June 2000 MIT mascot photograph. Upon information and belief Defendant had actual notice of this May 2013 takedown demand.

30. At all times relevant to this infringement action the registered Internet Protocol (“IP”) address for the Encyclopedia Dramatica website and the server providing access to the Encyclopedia Dramatica website both belong Cloudflare, Inc., a Delaware corporation

headquartered in San Francisco, California (“Cloudflare”).

31. At times material to this infringement action Cloudflare has continuously provided the authoritative nameservers for Zaiger’s website providing a so-called “pass-through security service” that acts as a “middleman” that sits between Zaiger’s website and the users who interact with it.

32. At times material to this infringement action Defendant has employed the services of Cloudflare, as his Internet Service Provider, upon information and belief, for among other purposes, to conceal the location of his server(s) and thereby enable Defendant to evade the Copyright Act.

33. On November 9, 2016, Plaintiff served a DMCA takedown request on Cloudflare including Plaintiff’s sworn attestation of the registration of copyrights and complaining of the ongoing infringing display on Cloudflare’s server and IP address; and, Plaintiff also asked Cloudflare to give notice of his infringement claim to Cloudflare’s customer, the otherwise anonymous Defendant. Upon information and belief Defendant had actual notice of Plaintiff’s November 9, 2016 DMCA takedown notice.

34. On February 7, 2017, Cloudflare’s “Legal Team” informed Plaintiff that “Cloudflare is a reverse proxy, pass-through security service and a content distribution network (CDN) ...[that Cloudflare] is not a hosting provider ... [and does] not have access to our customer’s content.” Cloudflare “suggest[ed] that ... [Plaintiff] get in direct contact with the website owner or the hosting provider;” Cloudflare did not inform Plaintiff of any contact information for its customer.

35. On March 2, 2017, Plaintiff filed his verified complaint. Notice of the lawsuit was published that same day. See, e.g.,

<https://www.plainsite.org/dockets/34er6pokd/massachusetts-district-court/monsarrat-v-gotper606700001-dba-encyclopediadramaticase-et-al/>. The March 2, 2017 verified complaint alleged that Zaiger was the administrator, and some then unknown Doe defendants were the owners, of the Encyclopedia Dramatica website.

36. Upon information and belief Zaiger had notice of the March 2, 2017 verified complaint.

37. On or about March 22, 2017, Zaiger moved the country registration for the Encyclopedia Dramatica website to Serbia.

38. Upon information and belief on or before April 19, 2017, Zaiger had actual notice of Plaintiff's April 18, 2017 Motion (ECF #10, 11) seeking a court order requiring certain of Zaiger's ISPs including Cloudflare to identify the owner of Encyclopedia Dramatica website.

39. Upon information and belief having notice of this lawsuit on or about April 19, 2017 a person identifying himself as Mantequilla removed the jonmon page from Encyclopedia Dramatica website.

40. On April 24, 2017 at 9:45am Zaiger was served with the summons and complaint. At 10:00am the Encyclopedia Dramatica administrator, upon information and belief either Zaiger or his employee Sibir Grašić emailed Plaintiff's counsel that "the page was removed." At 11:19 am that same day Plaintiff's counsel emailed Zaiger asking Zaiger to see to the removal of

<https://encyclopediadramatica.se/File:Jonmon-pedowheel.jpg> . At 11:24 am that same day Zaiger or his employee emailed in reply: “We will remove the image.”

41. On April 24, 2017 at 11:26 am this pedowheel image was removed by a user, “Abominable Intelligence.” On May 17, 2017 at 8:30am, the user, “Mantequilla” reposted the file Jonmon-pedowheel.jpg; and one minute later, “Mantequilla” apparently having a change of heart deleted the file Jonmon-pedowheel.jpg.

42. On May 20, 2017, the system administrator for Encyclopedia Dramatica, upon information and belief as authorized and directed by Zaiger emailed the Plaintiff’s counsel, with copy to Zaiger, that “we have removed the [Jonmon] article and protected the page ... [so that] no user can recreate the page. Additionally you have both Mr. Zaiger’s assurance and mine that the article won’t be recreated.”

JURISDICTION AND VENUE

43. This Court has subject matter jurisdiction over this Amended Complaint pursuant to 28 U.S.C. § 1338, and the Copyright Act, 17 U.S.C. § 101 et seq.

44. Venue is proper in this District pursuant to 28 U.S.C. §1391 and §1400(a) in that Defendant is an individual subject to personal jurisdiction in this District.

COUNT ONE

DIRECT COPYRIGHT INFRINGEMENT

45. Plaintiff repeats and realleges every allegation contained in paragraphs 1 through 44 as if fully set forth herein.

46. Defendant, without permission or consent of Plaintiff, reproduced and published

an unauthorized alteration of Plaintiff's copyrighted June 2000 MIT mascot photograph.

47. Defendant has registered and used the internet domain name of "Encyclopedia Dramatica" with a stated intent of evading applicable copyright and other laws.

48. Defendant engaged in an intentional, knowingly unauthorized alteration and reproduction and public display of Plaintiff's copyrighted June 2000 MIT mascot photograph.

49. For some unknown periods of time from and after approximately March 2012, Defendant has used Plaintiff's copyrighted June 2000 MIT mascot photograph that had been altered to maliciously and falsely label him as a pedophile who preys on underage girls for commercial purposes including without limitation to sell advertising space to a porn site, F—ckbook.com™, featuring images that are, or appear to be, of minors engaging in sexually explicit conduct.

50. Defendant's acts of infringement were willful, intentional, and purposeful, in disregard of, and indifferent to, the rights of Plaintiff.

51. In the alternative Defendant is vicariously liable for this actionable infringement. Defendant has the right and ability to supervise and control the infringing activities that occur through the use of his website, and upon information and belief based on his website's Copyright and privacy terms of use he derives financial benefit from re-publication and/or other public display of material posted on his website.

52. As a direct and proximate result of Defendant's willful infringement of Plaintiff's copyrights and exclusive rights under copyright of his June 2000 MIT mascot photograph, Plaintiff is entitled to the maximum statutory damages pursuant to 17 U.S.C. § 504(c)(2), in the

amount of \$150,000, or such other amounts as may be proper under 17 U.S.C. § 504(c).

53. Defendant's use of Plaintiff's copyrighted June 2000 MIT mascot photograph has greatly damaged the Plaintiff including without limitation the loss of business opportunities. But for Defendant's infringement Plaintiff would not have suffered a loss or impairment of his good will as a developer of an interactive video game to be marketed to young people of both sexes.

54. Hence, in the alternative, at Plaintiff's election pursuant to 17 U.S.C. § 504(b), Plaintiff is entitled to his actual damages plus Defendant's profits from infringement including without limitation the gross revenue from one or more porn websites, in amounts to be proven at trial.

55. Plaintiff is entitled to his costs, including an award of reasonable attorneys' fees, pursuant to 17 U.S.C. § 505.

56. Defendant does not qualify for protection of any the safe harbor provisions of 17 U.S.C. § 512.

COUNT II

SECONDARY COPYRIGHT INFRINGEMENT

57. Plaintiff repeats and realleges every allegation contained in paragraphs 1 through 56 as if fully set forth herein.

58. The Defendant knew and/or had reason to know of the direct infringement of Plaintiff's copyrighted June 2000 MIT mascot photograph.

59. While Defendant had actual and constructive knowledge that infringing materials

had been, and until April 19, 2017 continued to be, published and/or publicly displayed to users by means of his website, Defendant continued to store copies of Plaintiff's copyrighted work on his servers and then via its agent's servers in the United States displayed those copies to users in the United States.

60. Defendant knowingly caused and otherwise materially contributed to this unauthorized publication and public display of Plaintiff's copyrighted work.

61. Defendant is liable as a contributory copyright infringer for the infringing acts of the user Mantequilla and/or other users of the Encyclopedia Dramatica website.

62. In the alternative Defendant is vicariously liable for this actionable secondary infringement. Defendant has the right and ability to supervise and control the infringing activities that occur through the use of his website, and upon information and belief based on his website's Copyright and privacy terms of use he derives financial benefit from re-publication and/or other public display of material posted on their website.

63. As a direct and proximate result of Defendant's willful infringement of Plaintiff's copyrights and exclusive rights under copyright of his June 2000 MIT mascot photograph, Plaintiff is entitled to the maximum statutory damages pursuant to 17 U.S.C. § 504(c)(2), in the amount of \$150,000, or such other amounts as may be proper under 17 U.S.C. § 504(c).

64. Defendant's use of Plaintiff's copyrighted June 2000 MIT mascot photograph has greatly damaged the Plaintiff including without limitation the loss of business opportunities. But for Defendant's infringement Plaintiff would not have suffered a loss or impairment of his good will as a developer of an interactive video game to be marketed to young people of both sexes.

65. Hence, in the alternative, at Plaintiff's election pursuant to 17 U.S.C. § 504(b), Plaintiff is entitled to his actual damages plus Defendant's profits from infringement including without limitation the gross revenue from one or more porn websites, in amounts to be proven at trial.

66. Plaintiff is entitled to his costs, including an award of reasonable attorneys' fees, pursuant to 17 U.S.C. § 505.

67. Defendant does not qualify for protection of any the safe harbor provisions of 17 U.S.C. § 512.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Jonathan Monsarrat prays for judgment against Defendant Brian Zaiger as follows:

1. For a declaration that Defendant Brian Zaiger has willfully infringed Plaintiff's registered copyrights.
2. For a declaration that Defendant Brian Zaiger on behalf of the Encyclopedia Dramatica website that he operates has covenanted to not allow a user of the Encyclopedia Dramatica website to recreate the "jonmon" page.
3. Enter judgment and award actual or statutory damages in favor of Plaintiff Jonathan Monsarrat against Defendant Brian Zaiger on Counts I-II in amounts to be determined at trial.
4. Award Plaintiff Jonathan Monsarrat his costs and attorney's fees as well as prejudgment interest.

5. Grant such other and further equitable relief under Titles 17 and 28, and pursuant to this Court's inherent equitable powers, as the Court deems just and proper.

DATED: October 25, 2017

Respectfully submitted,

JONATHAN MONSARRAT,
Plaintiff,

By his attorneys,

ss/ Richard A. Goren

Richard A. Goren, Esq. BBO #203700

Law Office of Richard Goren

One State Street, Suite 1500

Boston, MA 02109

617-933-9494

rgoren@richardgorenlaw.com

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), on October 25, 2017.

/s/ Richard A. Goren

EXHIBIT A



EXHIBIT B

Contents

- 1 Meet Jonnon!
- 2 Making OKCupid Look Professional: The Match-Up Debate
- 3 Check In: Chai Nox, The Punk'd Soul Brother
- 4 Where Is He Now?

et Jonnon!

Jonnon, known as Jonnon #1up:www.mt.edu/jonnon/index.shtml at MIT, made you laugh on OKCupid, known as a total idiot, the world over. In the world's most sexually desperate man. At the age of 38, he chews the fat goals in the hope of curing his virginity. But that's just the start of the fat!

King OKCupid Look Professional: The Match-Up Debate

Mr. Jonnon decided to start his very own Valentine's Day dating website using his Facebook. The site makes users divulge lots of personal information in order to use the service, and promised to match each user's profile with other potential mates. Sadly, the women got matched up with Jonnon and 8,000 sex kinks.

media:www.therecord.org/media/storage/asset/2009/news/20091017/News/Dating-Service-Creator-Associated/Pressing-Subjects-49629.shtm



Jon Jonnon reveals his OKCupid profile



Jonnon reveals 1up to express his OKCupid profile

66 *Hey! Let me put it this way. I'm a good judge of character. You seem fantastic. I'd like to meet you. Love that 'Up late talking and snuggling on the sofa' and 'Singing to me.' Sure, I'll play guitar & sing for you. :) I know you're busy and this whole dating thing feels like a burden. Maybe we*

EXHIBIT C (filed under seal)

EXHIBIT D (filed under seal)