

1 D. GEORGE SWEIGERT, C/O
2 336 BON AIR CENTER #241
3 GREENBRAE, CA 94904

4 IN THE UNITED STATES DISTRICT COURT
5 FOR THE EASTERN DISTRICT OF VIRGINIA
6 RICHMOND DIVISION

7 ROBERT DAVID STEELE, ET. AL.

Case No.: 3:17-CV-601-MHL

8 Plaintiff,

9 vs.

DECLARATION OF D.
GEORGE SWEIGERT

10 JASON GOODMAN, ET. AL.

Defendant

11 **SECOND DECLARATION OF D. GEORGE SWEIGERT**

12 Now comes D. George Sweigert to inform this Court of recent e-mail messages that have been received as a result of
13 the conduct of the defendant – Jason Goodman. I hereby attest that the following statements are true and made
14 under the penalties of perjury.

15 **I. YOUTUBE TRADEMARK STRIKE**

16 I am a California licensed Emergency Medical Technician (EMT) and until last week operated an EMT
17 training YouTube channel known as “The EMT Basic”. In an unexpected and sudden manner this YouTube channel
18 was decommissioned and terminated by YouTube, Inc. as a result of “strikes”, which are a form of on-line
19 complaint. This type of “strike” can accumulate into a score that leads to the termination of a channel. One such
20 “strike” was originated by Jason Goodman and is attached as **Exhibit One**.

21 The Court’s attention is directed to the corporation that purports to own the trademark [**Exh. 1**]
22 **“CROWDSOURCE THE TRUTH”**: owned by **Multimedia System Design, Inc.** This information was contained
23 in the e-mail message sent to the undersigned by YouTube, Inc. Commentary created by defendant Jason Goodman
24 is provided. Mr. Goodman asserted: “Clarification: This person [the undersigned presumably] makes a regular
25 practice of stealing and reuploading my videos with the specific intent of harassing me and falsely accusing me of
26 crimes. Signature. Jason Goodman.”

27 I HEREBY DENY all the allegation asserted by Mr. Goodman. I have never downloaded a Jason
28 Goodman video and “reuploaded it”. I have never accused Mr. Goodman falsely of a crime. DENIED.

DECLARATION OF D.GEORGE SWEIGERT - 1

1 **II. FILINGS WITH THE U.S. PATENT AND TRADEMARK OFFICE (USPTO).**


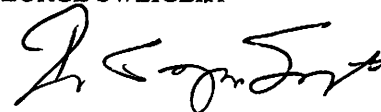
2 After receiving the “strike” message the undersigned validated the information of the trademark with the
3 USPTO. Contained in **Exhibit Two** is an accurate and true display of the USPTO web-site. The Court’s attention is
4 directed to the address given to the USPTO for this trademark registration: **Multimedia System Design, Inc.**
5 **CORPORATION NEW YORK 6s 252 7th Avenue New York NEW YORK 10001.** The undersigned affirms
6 this image is an accurate capture of the USPTO web-site.

7 A verification check with the State of New York Division of Corporation is displayed in **Exhibit Three.** A
8 definition of the requirement to use a certified fictitious name is attached in **Exhibit Four.**

9 The undersigned has observed that in Exhibit One the following information is displayed (in continued part
10 b) **“Company Name: Crowd Source The Truth”.**

11 All the impressions and artifacts contained in the foregoing mentioned exhibits are true and accurate
12 representations of actual electronic media platforms.

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16 Dated this day of May 21, 2018

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19 D. GEORGE SWEIGERT
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LIST OF EXHIBITS

- I. YouTube, Inc. e-mail message of trademark infringement
- II. Trademark application states with USPTO
- III. New York State Division of Corporations status
- IV. New York State Division of Corporations regulations

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EXHIBIT ONE

1 **Part A**

2 ----- Forwarded message -----

3 **From: YouTube Legal Support Team** <trademark+0i2cq3zcq7vhn0c@support.youtube.com>

4 **Date:** Sat, May 12, 2018 at 11:39 AM

5 **Subject:** Trademark Complaint Received

6 **To:** actontheactor-7226@pages.plusgoogle.com

7 Hello,

8 This is to notify you that we have received a trademark complaint regarding your content, the details of which appear at the end of this message.

9 We strongly encourage parties to resolve their trademark disputes directly. In order to give you an opportunity to respond to the complaint, we will not take action on the complaint for 48 hours. If you are unable to resolve this issue with the complainant, the complaint will be reviewed by the YouTube Team and may be removed pursuant to our Trademark Guidelines (<https://support.google.com/youtube/answer/2801979>).

10 For more information on editing the title, description, or tags of your video, please visit the YouTube Help Center at https://support.google.com/youtube/topic/4355241?ref_topic=4355169. If the alleged violation is located within the video itself, you may have to remove the video in its entirety (<https://support.google.com/youtube/answer/55770>).

11 Regards,

12 The YouTube Legal Support Team

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PART B

Title: CEO

Full legal name: Jason Goodman

Company name: Crowdsorce the Truth

Trademark owner name: Multimedia System Design Inc

Relationship: I own Multimedia System Design Inc and Crowdsorce the Truth

Email: jason@21stcentury3d.com

Brand type: Wordmark and Logo

Register status: Yes

Jurisdiction of registration: US

Registration number: 87752970

Content type: Video

Videos: <http://www.youtube.com/watch?v=0WmDlul6LOW>

Clarification: This person makes a regular practice of stealing and reuploading my videos with the specific intent of harassing me and falsely accusing me of crimes

Signature: Jason Goodman

Evidence: 8d980fac7b8e40d7b0f52da7d746b154.png

Evidence: c911951c47bf4c1681e4a9344cbf38ba.png

[Help center](#) • [Email options](#)

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EXHIBIT TWO

Crowdsource the Truth

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5 **Word Mark** CROWDSOURCE THE TRUTH
6 **Goods and Services** IC 041. US 100 101 107. G & S: Providing on-line videos featuring
7 news in the nature of current event reporting, not downloadable.
8 **Standard Characters Claimed** FIRST USE: 20161001. FIRST USE IN COMMERCE: 20170801
9 **Mark Drawing Code** (4) STANDARD CHARACTER MARK
10 **Serial Number** 87752970
11 **Filing Date** January 12, 2018
12 **Current Basis** 1A
13 **Original Filing Basis** 1A
14 **Published for Opposition** June 5, 2018
15 **Owner** (APPLICANT) Multimedia System Design, Inc CORPORATION
16 NEW YORK 6s 252 7th Avenue New York NEW YORK 10001
17 **Disclaimer** NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE
18 "CROWDSOURCE" APART FROM THE MARK AS SHOWN
19 **Type of Mark** SERVICE MARK
20 **Register** PRINCIPAL
21 **Live/Dead Indicator** LIVE
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EXHIBIT THREE



Services News Government Local

**NYS Department of State
Division of Corporations
Entity Information**

The information contained in this database is current through May 18, 2018.

Selected Entity Name: MULTIMEDIA SYSTEM DESIGN, INC.

Selected Entity Status Information

Current Entity Name: MULTIMEDIA SYSTEM DESIGN, INC.

DOS ID #: 1830828

Initial DOS Filing Date: JUNE 21, 1994

County: NEW YORK

Jurisdiction: NEW YORK

Entity Type: DOMESTIC BUSINESS CORPORATION

Current Entity Status: ACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

% RANDY S. NEWMAN, ESQ.

208 EAST 51ST STREET

SUITE 200

NEW YORK, NEW YORK, 10022

Registered Agent

NONE

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EXHIBIT FOUR

DEPARTMENT OF STATE, DIVISION OF
CORPORATIONS, STATE RECORDS & UCC
ANDREW M. CUOMO, GOVERNOR ROSSANA ROBADO, SECRETARY OF STATE



[DOS Home](#) [Division Home](#) [I would like to...](#) [Corporation/Business Entity Filings](#) [State Records](#) [Uniform Con](#)

Certificate of Assumed Name

Purpose: Corporations, limited partnerships, and limited liability companies are required by statute to conduct activities under their true legal name. If a corporation, limited partnership, or limited liability company desires to conduct activities under a name other than its true legal name, a certificate complying with Section 130 of the General Business Law must be filed with the New York State Department of State. All other entities such as general partnerships, sole proprietorships, and limited liability partnerships file an Assumed Name Certificate directly with the county clerk in each county in which the entity conducts or transacts business.

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7 **ROBERT DAVID STEELE, ET. AL.**

Case No.: 3:17-CV-601-MHL

8 **Plaintiff,**

9 **vs.**

CERTIFICATE OF SERVICE

10 **JASON GOODMAN, ET. AL.**

11 **Defendant**

12 **CERTIFICATE OF SERVICE**

13 **On this day, May 21, 2018, I have caused to be placed into the U.S. Postal Service true copies of the attached**
14 **pleading (with First Class postage affixed) to the following parties.**

15 **Fernando Galindo, Clerk**
16 **U.S. District Court, E.D. VA**
17 **Federal Courthouse**
18 **701 East Broad Street**
19 **Richmond, VA 23219**

20 **Steven S. Biss (VSB # 32972)**
21 **300 West Main Street, Suite 102**
22 **Charlottesville, Virginia 22903**


23 **Terry Catherine Frank**
24 **Kaufman & Canoles PC**
25 **1021 E. Cary Street, Suite 1400**
26 **PO Box 27828**
27 **Richmond, VA 23219**

28 **Copy of FIRST DECLEARION ALSO INCLUDED FOR THE**
ABOVE

Jason Goodman
252 7th Avenue #6S
New York, NY 10001

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I hereby attest under the penalties of perjury that the foregoing is true and accurate.



D. GEORGE SWEIGERT
