UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JAMES OXENDINE and SOUTHEAST BULLY KENNELS, LLC Plaintiffs, v. MATTHEW SIEBENTHAL, individually; MATTHEW SIEBENTHAL d/b/a VENOMLINE POCKET BULLIES; MATTHEW SIEBENTHAL d/b/a THE BULLY KING MAGAZINE; MATTHEW SIEBENTHAL d/b/a THE BULLY THRONE MAGAZINE; TEXAS SIZE BULLIES LLC d/b/a VENOMLINE POCKET BULLIES, THE BULLY KING MAGAZINE, THE BULLY THRONE MAGAZINE; ABC CORPORATIONS 1-5, representing unknown entities owned or operated by MATTHEW SIEBENTHAL Defendants.	Case No. **COMPLAINT WITH JURY DEMAND**

Plaintiffs James Oxendine ("Oxendine") and Southeast Bully Kennels, LLC ("SBK") (together, "Plaintiffs") bring this action as against Matthew Siebenthal ("Siebenthal") both in his individual capacity, and in his capacity of doing business as Venomline Bullies ("Venomline"), The Bully King Magazine, The Bully Throne Magazine, as well as Texas Size Bullies, LLC d/b/a Venomline Bullies, The Bully King Magazine, and The Bully Throne Magazine (all together, "Defendants") for: (1) the submission of Misrepresentation under the Digital Millennium Copyright Act pursuant to 17 U.S.C. § 512(f); (2) defamation per se; (3) injurious falsehood; (4) tortious interference with business relations; and (5) violations of Florida's Deceptive and Unfair

Trade Practices Act, all stemming Defendants' malicious, calculated, and defamatory campaign of interference with Plaintiffs' business.

Since at least February 2026, Defendants have used their own publications, websites, and social media accounts to repeatedly make dozens of false statements intending to harm Plaintiff's business. Worse, on no fewer than forty separate occasions, Defendants have submitted or caused to be submitted false DMCA claims to Google resulting in the takedown of Plaintiff's website and Google business page, causing significant loss of business and goodwill, and resulting in the loss of years of positive Google reviews to due lost data between the takedown and restoration the page following the unwarranted takedowns. Defendants have posted fake negative reviews, reiterated false statements in photographs on Plaintiffs' pages, and fabricated messages from "clients" claiming to be harassed by Plaintiffs. In perhaps the most egregious instance of all, Defendants attempted to "frame" Plaintiff by submitting a complaint to the Better Business Bureau in Oxendine's name, only to have mixed up the names in the Complaint making the complaint nonsensical and obvious.

Defendants' conduct is ongoing, is causing irreparable harm to Plaintiffs, and is defamation per se. Accordingly, as requested herein and in the Order to Show Cause to be filed hereafter, Plaintiff seeks a declaratory relief, treble and punitive damages, and attorneys' fees, and alleges as follows:

The Parties

1. Plaintiff, James Oxendine, is an individual domiciled in the State of South Carolina, and is the sole Member of Southeast Bully Kennels, LLC.
2. Plaintiff, Southeast Bully Kennels, LLC, is a limited liability company organized and existing under the laws of the State of South Carolina, with all Members domiciled in South Carolina and a principal place of business in North Carolina.

3. Defendant, Matthew Siebenthal, is an individual believed to be domiciled in the State of Florida.
4. Defendant, Texas Size Bullies LLC, is a limited liability company organized and existing under the laws of the State of Florida, with all Members believed to be domiciled in Florida and a principal place of business in Florida. Defendant Siebenthal is named as the registered agent of Texas Size Bullies LLC with Florida's Division of Corporations.
5. Upon information and belief, Defendant, The Bully King Magazine, is an unincorporated[1] entity operating out of the State of Florida and is believed to be owned and operated by Siebenthal.
6. Upon information and belief, Defendant, The Bully Throne Magazine, is an unincorporated entity operating out of the State of Florida and is believed to be owned and operated by Siebenthal.
7. Upon information and belief, Defendant, Venomline Pocket Bullies is controlled and operated by Siebenthal and is either unincorporated or serving as a d/b/a of Texas Size Bullies LLC.
8. Defendants, ABC CORPORATIONS 1-5, are intended to represent any unnamed incorporated iteration of Defendants The Bully King Magazine, The Bully Throne Magazine, and/or Venomline Pocket Bullies.

Jurisdiction

[1] Plaintiff notes that the Florida Division of Corporations shows BULLY KING MAGAZINE LLC being formed in 2016 and dissolved for failure to file its annual report in 2023. Defendant Matt T. Siebenthal is named as Registered Agent of the dissolved LLC.

9. This Court has original subject matter jurisdiction under 28 U.S.C. § 1331, for a federal question arising under the laws of the United States which includes the Copyright Act of 1972, 17 U.S.C. §§ 101 et seq.
10. This Court also has jurisdiction under 28 U.S.C. § 1332 based on diversity of citizenship and, on information and belief, an amount in controversy over $75,000, exclusive of interest and costs.
11. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367(a) over all claims not asserted under the copyright laws, as these claims are related to claims within the Court's original jurisdiction.
12. This Court has personal jurisdiction over Defendants, as each is located, domiciled, and acting within this District.
13. Venue is proper in the Southern District of Florida, West Palm Beach District, because Defendants reside in and can be found in this District pursuant to 28 U.S.C. §§ 1391(b) and 1400(a).

Statement of the Case

14. Plaintiff, Southeast Bully Kennels, LLC is an American Bull Kennel Club recognized and American Bully Registry recognized dog breeder specializing in ethical and transparent breeding of the dog breed known as Pocket Bullies or Micro Bullies, a smaller variant of the American Bully breed.
15. SBK is owned and operated by Plaintiff Oxendine, a Certified Dog Trainer with over 20 years of experience in both training and breeding dogs.

16. Since 2007, SBK has become known for its ethical practices, its transparency with both customers and regulatory authorities, and its breeding of dogs that have gone on to be nationally recognized dog show champions and family-friendly companions.
17. SBK has an A+ rating as an accredited business of the Better Business Bureau, and prior to Defendants' interference, had over 130 positive reviews of its business averaging over 4 out of 5 stars.
18. To its knowledge, until Defendants' interference, SBK never had any complaints filed about its business, ethical practices, or breeding practices to any regulatory body.
19. Upon information and belief, Defendant Siebenthal is the owner and operator of Venomline Bullies, which purports to offer Pocket Bully puppies and Pocket Bully stud services.
20. Upon information and belief, Defendant Siebenthal is the owner and operator of The Bully King Magazine and The Bully Throne Magazine, online publications and mobile applications centered around the Bully dog breed.
21. Upon information and belief, Siebenthal operates and controls the various social media accounts associated with Venomline, The Bully King Magazine, and the Bully Throne Magazine, including pages on Facebook, Instagram, Pinterest, and LinkedIn.
22. According to internet archiving tools, Defendants' website, found at www.venomlinebullies.com launched in July 2024, after formerly redirecting to Defendants' controlled "Texas Sized Bullies" website.
23. Upon information and belief, and unbeknownst to Plaintiffs at that time, Defendants' campaign of defamation, false DMCA claims, and interference with Plaintiffs' business began the same month – July 2024 – with a false claim submitted to Google by Bully King

Magazine LLC alleging that "Southeast Bully Kennels has stolen copyrighted images material for articles and for use on their website to mislead Customers."

24. A year later, upon information and belief, Defendants submitted two false defamation claims to Google. The first, on July 13, 2025, claiming that Plaintiffs' Google business profile was "a verified fake impersonation of [Defendants'] kennel;" and the second, on July 15, 2025, claiming that "Southeast Bully Kennels (southeastbullykennels.com) manipulates Google Search via PBNs, cloaking, toxic links, and fake reviews, violating Google's Webmaster Guidelines."

25. It was following these false claims that Defendants' defamation and false DMCA campaign began in earnest, with over 40 more false DMCA Claims:

    a. On July 20, 2025, Venomline Pocket Bullies filed a false DMCA Complaint to Google claiming that Plaintiff left a fake review about Defendants;

    b. On August 6, 2025, Venomline filed a DMCA claim, stating "[t]his is a formal legal request for removal of infringing and defamatory content hosted on malicious Private Blog Networks (PBNs) operated by Southeast Bully Kennels (SEBK) and its owner, James Oxendine. These websites have republished copyrighted content from Venomline Pocket Bullies and fabricated defamatory claims designed to inflict reputational and commercial harm."

    c. On August 8, 2025, Texas Size Bullies LLC DBA Venomline Pocket Bullies submitted a false DMCA claim, stating "Southeast Bully Kennels (SEBK) and its owner, James Oxendine [. . .] publish fabricated stories, stolen copyrighted content, and AI-generated articles to falsely accuse Venomline Pocket Bullies of criminal activity."

d. Also on August 8, 2025, Texas Size Bullies LLC submitted a false DMCA claim, stating "Coordinated pattern of abuse by Southeast Bully Kennels and James Oxendine. Violations: * Trademark Infringement, Fraud, Impersonation & Misrepresentation: Continued use "Block Bloodline®" trademark."

e. On August 15, 2025, Venomline Pocket Bullies submitted a false DMCA claim alleging a laundry list of "violations."

f. This pattern continued and continues to date, with similar or false DMCA claims being made on:

   i. August 19, 2025 by Venomline **(four separate claims**);

   ii. August 28, 2025 by Texas Size Bullies DBA Venomline **(two separate claims)**;

   iii. February 21, 2026 by Venomline **(two separate claims)**;

   iv. February 25, 2026 by Venomline **(four separate claims)**;

   v. February 26, 2026 by Venomline;

   vi. March 2, 2026 by Venomline **(two separate claims)**;

   vii. March 3, 2026 by Venomline **(two separate claims)**;

   viii. March 4, 2026 by Venomline;

   ix. March 12, 2026 by Venomline;

   x. March 15, 2026 by Venomline **(two separate claims)**;

   xi. March 19, 2026 by Venomline **(two separate claims)**;

   xii. March 24, 2026 by Venomline;

   xiii. March 30, 2026 by Venomline;

   xiv. March 31, 2026 by Venomline;

xv. April 4, 2026, with three claims by Bully King Magazine LLC, and two claims by Venomline;

xvi. April 16, 2026 by Venomline;

xvii. May 10, 2026, believed to be by Venomline; and,

xviii. Upon information and belief, several additional claims between May 10, 2026 and the filing of this action;

An example of one of Defendants' complaints which is representative of the majority of the claims made above, as summarized on Lumen is attached hereto as **Exhibit A.**

26. In total, between July 2025 and June 2026, Defendants submitted at least 45 false claims to Google in relation to Plaintiffs.

27. Along with the false DMCA claims, in February 2026, Defendants began utilizing their public facing platforms to harass and defame Plaintiffs, all in attempt to destroy Plaintiffs' business.

28. On February 21, 2026, using an account on medium.com called Bully Throne Magazine, Defendants falsely stated that SBK has fake reviews and built its brand by copying content from Defendants. The Bully Throne Magazine, while publicly facing, has three followers: Amanda Calliston (believed to be Siebenthal's partner), The Bully King Magazine, and Venomline.

29. The same day, Calliston left a fake 1-star review on SBK Google business page despite never having done business with Plaintiffs, after having left a 5-star review on Venomline's page months earlier.

30. On February 23, 2026, Venomline made a blogpost on Medium.com about SBK with various false statements that SBK copied content from Venomline and stole Venomline's intellectual property.

31. On February 24, 2026, Defendants, utilizing the Instagram, Facebook, and Pinterest accounts of The Bully Throne Magazine, The Bully King Magazine, Texas Size Bullies, and Venomline, made false statements that Plaintiffs have stolen content, stolen intellectual property, manipulate search engines, and have fake reviews.

32. On March 6, 2026, Venomline stated that Defendants have "exposed" SBK, and again made false statements that SBK LLC stole intellectual property and manipulated search engines to "sabotage" Defendants' business.

33. Between March 10, 2026 and March 27, 2026, using the controlled social media accounts, Defendants made 10 to 20 posts each day about SBK, using SBK's photographs and making defamatory statements therewith.

34. On March 13, 2026, Siebenthal filed a fraudulent complaint to the Better Business Bureau in an attempt to make it appear as though Plaintiffs are filing fake complaints to interfere with *Defendants'* business. However, Siebenthal accidentally added his own name and address to the complaint then filed it against his own business.

35. On March 31, 2026, Siebenthal falsely stated that Google took unilateral action against Plaintiffs by removing its business page. However, Google's takedown was the result of Defendant's dozens of false DMCA claims.

36. On March 31, 2026, Siebenthal publicly documented and boasted about his DMCA claims, verifying his involvement in the falsehoods.

37. On March 31, 2026, Siebenthal falsely claimed that SBK is committing criminal level animal abuse.

38. By March 31, 2026, Siebenthal, using the various controlled accounts, was posting false statements about Plaintiffs on multiple dog and breeding forums to sabotage Plaintiffs' business.

39. On April 9, 2026, Siebenthal, Venomline, and The Bully King Magazine all stated they have retained legal counsel and falsely stated that SBK is committing fraud, theft, and SEO manipulation through fake reviews.

40. On April 9, 2026, unaware of www.LumenDatabase.org, which tracks and reports DMCA claims made to Google, Siebenthal, Venomline, and The Bully King Magazine falsely stated that SBK has submitted more than 150 fraudulent DMCA claims.

41. On April 9, 2026, Siebenthal, through social media, falsely stated that Plaintiffs have committed digital sabotage.

42. On April 10, 2026, Siebenthal, through social media, falsely stated that:

    a. the Federal Trade Commission, Attorney General, and Better Business Bureau are all investigating Plaintiffs;

    b. civil and criminal charges and penalties are accruing;

    c. Plaintiffs are facing an ethics hearing and will be banned from operating in the near future;

    d. SBK LLC has committed over 40 instances of theft; and,

    e. SBK LLC is committing fraud.

43. On April 12, 2026, Venomline created a section on Pinterest purporting to highlight dog breeding "scam" pages and added various posts about SBK.

44. On April 13, 2026, Siebenthal posted a review on SBK's Yelp page and took screenshots of the same, then reposted the screenshots repeating the various false statements made across platforms and on Plaintiffs' business pages. The text of the review is as follows:

> I am posting this to warn the community and potential business partners about a calculated, multi-year campaign of systemic fraud and platform manipulation allegedly orchestrated by James Oxendine (SEBK – Southeast Bully Kennels). What we are witnessing appears to be a coordinated effort to dismantle competitors through unlawful and deceptive means.
>
> The pattern of abuse is extensive:
>
> Mass DMCA Fraud
>
> Over 150 fraudulent DMCA takedown requests have been filed – an apparent abuse of the legal system using false claims under penalty of perjury to de-index and silence legitimate businesses like Venomline, Blockline Bullies, and others.
>
> Wholesale IP Theft
>
> Forensic analysis indicates a 94% similarity between SEBK's articles, contracts, website content, posts, and guarantees- content that closely mirrors proprietary material predating SEBK by nearly two years.
>
> Brand impersonation
>
> Branding, layouts, and visual identity have been closely mimicked, including the unauthorized use of images of the Venomline owner, his wife, and their dogs- potentially to mislead the public and leverage established reputations.
>
> Reputation Scrubbing & Sabotage
>
> Over 100 positive reviews appear to have been generated to boost internal ratings, while targeted 1-star reviews have been directed at competitors to negatively impact their credibility.
>
> Coordinated Platform Attacks
>
> Reports filed across Google, Meta, Instagram, and Reddit have allegedly resulted in wrongful bans, content removals, and monetization losses for affected creators.
>
> Search Engine Enforcement Action

*22 URLs on southeastbullykennels.com have been removed from search results globally due to hosting content identified as originally belonging to Venomline.

Reputation Engineering

The activity extends beyond content concerns into what appears to be a broader campaign of digital reputation manipulation:

Review Manipulation

Hundreds of positive reviews were allegedly used to create a misleading public image. Notably, the "#1 Rated & Reviewed American Bully Breeder" claim dropped from approximately 150 reviews to zero in a short period.

False Claims & Misrepresentation

Claims of producing 25+ Champions and Grand Champions have been disputed. Titles within the ABKC are verifiable through official records.

Client Harassment

Reports indicate direct contact with clients—allegedly to spread misinformation, disrupt transactions, and damage professional relationships.

Targeted Negative Revies

Competitors, including Venomline, have received 1-star reviews citing alleged health, quality, or breeding issues that are claimed to be fabricated.

Black Hat SEO Practices

Tactics such as keyword stuffing, link schemes, review manipulation, and content repurposing appear to have been used to artificially boost visibility while suppressing competitors.

Criminal Business Interference

Actions allegedly intended to disrupt competitor relationships, contracts, and transactions—resulting in economic harm

Direct Client Interference

Contacting potential or current clients via calls, texts, or messages to introduce doubt, spread misinformation, or derail business dealings.

Evidence of Material Misrepresentation

We maintain forensic documentation supporting these claims, including:

*Metadata and copyright records predating disputed content
*A 'Master Forensic List' documenting 150+ DMCA striked
*Logs indicating intent to cause commercial harm through digital tactics

Full evidence and audit: https://venomlinebullies.com/pages/copyright-protection-policy

45. On April 16, 2026:

    a. Siebenthal posted 20 photographs of screenshots reiterating the various false statements repeatedly made about SBK;

    b. Yelp removed Siebenthal's review and less than an hour later, Siebenthal left another identical 1-star review;

    c. Siebenthal falsely stated that the American Bully Kennel Club is banning SBK;

    d. Siebenthal again falsely stated that SBC LLC is committing "criminal level abuse;"

    e. Siebenthal attempted to frame is fraudulent Better Business Bureau complaint as a weaponization of the BBB by Plaintiffs

46. From April through June, Siebenthal, through the various controlled social media accounts, continued to post multiple times per day repeating the various false statements about Plaintiffs.

47. On April 9, 2026, following the restoration of Plaintiffs' Google Business page, Google was unable to restore the 130 positive reviews present prior to Defendants' interference resulting in the loss of years of work and developed goodwill.

48. On June 23, 2026, Siebenthal posted photographs showing Plaintiffs' Google business page with 130 positive reviews prior to Defendants' interference, and the page following

restoration with zero reviews, and falsely claimed that Google removed the reviews because they were fake.

49. On July 3, 4, 5, and 6 posted 1-star reviews and screenshots repeating the false statements.

50. Upon information and belief, across social media platforms, Defendants have made over 1000 false statements about Plaintiffs.

51. Defendants even maintain and update a dedicated page on the venomlinebullies.com website which documents their own harassment and defamation of Plaintiffs, a printout of which is attached hereto as **Exhibit B.**

52. Defendants' conduct continues to date, with false DMCA claims and social media posts about Plaintiffs being made as recently as July 10, 2026.

53. To summarize, Defendants, each on their own and through the various controlled accounts of Venomline, The Bully King Magazine, and The Bully Throne Magazine, have repeatedly, publicly, and in DMCA claims made the following false statements:

    a. That SBK submitted over one-hundred and fifty DMCA claims to "de index and silence legitimate businesses; for example, stating, "This account is under sustained, coordinated attack involving 150+fraudulent DMCA takedown request in the past 5 days alone."

    b. That SBK stole Defendants' intellectual property; for example, stating, "Wholesale IP Theft: Forensic analysis indicates a 94% similarity between SEBK's articles, contracts, website content, posts, and guarantees- content that closely mirrors proprietary material predating SEBK by nearly two years."

    c. That SBK impersonated Defendants and their "brand;" for example, stating "Branding, layouts, and visual identity have been closely mimicked, including the

unauthorized use of images of the Venomline owner, his wife, and their dogs-potentially to mislead the public and leverage established reputations."

d. That SBK posted fake positive reviews on its own business page and negative reviews on competitors' pages; for example, stating, "over 100 positive reviews appear to have been generated to boost internal ratings, while targeted 1-star reviews have been directed at competitors to negatively impact their credibility."

e. That SBK's websites were taken down due to its own misconduct; "*22 URLs on southeastbullykennels.com have been removed from search results globally due to hosting content identified as originally belonging to Venomline."

f. That SBK made false claims about the pedigree of its dogs; for example, stating, "Claims of producing 25+ Champions and Grand Champions have been disputed. Titles within the ABKC are verifiable through official records."

g. That SBK contacted Defendants' clients to "spread misinformation" and "disrupt transactions;" for example, stating, "Reports indicate direct contact with clients—allegedly to spread misinformation, disrupt transactions, and damage professional relationships."

h. That SBK is being investigated by the Federal Trade Commission, Attorney General, and Better Business Bureau; for example, stating "FTC, BBB, & Attorney General – Civil & Criminal Charges + Penalties Accruing"

i. That Defendants have committed "Criminal Business Interference;" for example, stating "Criminal Business Interference: Actions allegedly intended to disrupt competitor relationships, contracts, and transactions—resulting in economic harm"

j. That SBK is going to be banned by the American Bully Kennel Club; for example, stating "ABKC: Ethics hearing and registry bans upcoming."

k. That SBK treats its dogs unethically; for example, stating "Southeast Bully Kennels and James Oxendine are reportedly facing an ABKC Ethics Committee hearing."

l. That SBK has committed crimes; for example, stating "This is not a standard intellectual property dispute; it is a criminal-level abuse of platform reporting systems . . . to facilitate harassment, theft and the intentional destruction of revenue"

m. That SBK has committed fraud against Google; for example, stating "Venomline preserves evidence and a separate Google Business Profile complaint packet concerning alleged coordinated inauthentic engagement, review padding, review suppression, and deceptive business-location representation tied to the Southeast Bully Kennels listing."

n. That SBK has committed fraud against the Better Business Bureau; for example, stating "[SBK] has initiated a barrage of bad faith reports—including fraudulent BBB complaints--(across all social platforms) designed to trigger automated account flags, suppress search visibility, and directly interfere with active sales cycles"

54. None of these statements are true and each tends to and was intended to injure Plaintiffs in their trade, business, and profession.

55. These false statements, false claims, false DMCA submissions, and interference with Plaintiffs' business are causing irreparable harm to the business due to reputational harms, and loss of goodwill.

56. Indeed, Defendants' actions and false statements are so prevalent that Google's own AI program had begun to reference the "controversy" into its summary of Plaintiffs' business, as it incorporates social posts from Defendants' accounts into the same.

57. On or about June 26, 2026, Plaintiffs, through counsel, sent Defendants a cease-and-desist, demanding that the above referenced posts, websites, claims, and conduct immediately stop.

58. To date, Defendants' malicious conduct continues through its website, social media pages, and false DMCA claims.

COUNT I – DECLARATORY RELIEF

59. Plaintiffs repeat and reallege Paragraphs 1 through 58 as if set forth herein.

60. Plaintiffs notified Defendants of its wrongdoing and demanded that they stop by means of a cease-and-desist letter, but Defendants have not stopped.

61. An actual, present, and justiciable controversy has arisen between Plaintiffs and Defendants concerning the harms of Defendants' false statements and interference with Plaintiffs' business.

62. Plaintiffs contend that their website does not and has never infringed upon Defendants' rights, that Defendants' statements about and allegations against Plaintiffs are untrue, and that Plaintiffs have acted honestly and fairly in operating their business.

63. Based on Defendants' continued conduct, and upon information and belief, Defendants plan to continue to make false claims against, false statements about, and interfere with Oxendine and SBK in the aforementioned manner for the indefinite future.

64. Defendants' actions and statements warrant a declaration from this Court that Defendants must cease making false statements about and interfering with Plaintiffs' and their business.

COUNT II - MISREPRESENTATION OF COPYRIGHT INFRINGEMENT UNDER DIGITAL MILLENNIUM COPYRIGHT ACT (17 U.S.C. §512(f))

65. Plaintiffs repeat and reallege Paragraphs 1 through 58 as if set forth herein.

66. On at least 44 occasions, Defendants submitted notices to Google containing material misrepresentations and falsehoods about Plaintiffs.

67. Defendants did so knowing that such statements were false, and with the intent to harm Plaintiffs.

68. As a result of Defendants' actions alleged herein, Plaintiffs have suffered, are suffering, and will continue to suffer substantial damage to its business in the form of lost profits and injury to goodwill and reputation.

69. Unless this Court restrains Defendants from further commission of the aforementioned acts, Plaintiffs will suffer irreparable injury, for which it is without adequate remedy at law. Accordingly, Plaintiffs seek an order enjoining Defendants from sending any further wrongful notices, complaints, or threats in connection with the Plaintiffs' website or business.

70. As a result of Defendants' knowing material misrepresentations, Plaintiffs are entitled, pursuant to 17 U.S.C. § 512(f) to all damages, including costs and attorneys' fees, which it incurred as the result of Google's reliance upon Defendants' misrepresentations.

COUNT III – DEFAMATION PER SE

71. Plaintiffs repeat and reallege Paragraphs 1 through 58 as if set forth herein.

72. Defendants intentionally, negligently, and/or recklessly made false statements about Plaintiffs by stating that Plaintiffs stole intellectual property, impersonated Defendants and their "brand," posted fake positive reviews on its own business page and negative reviews

on competitors' pages, had their websites taken down due to their own misconduct, made false claims about the pedigree of its dogs, contacted Defendants' clients to "spread misinformation" and "disrupt transactions" are being investigated by the Federal Trade Commission, Attorney General, and Better Business Bureau, are going to be banned by the American Bully Kennel Club, treat their dogs unethically have committed fraud, have committed fraud against Google; and, have committed fraud against the Better Business Bureau.

73. Defendants published these libelous statements on multiple social media accounts, on their own websites, on Plaintiffs' public business profiles, and in DMCA claims made to Google.
74. Defendants intended that these defamatory statements would reach Plaintiffs' customers and cause harm to Plaintiffs.
75. Defendants' defamatory statements were read by people in this District and others.
76. Defendants knew or should have known that these statements were false.
77. Defendants' statements state, suggest, and imply that Plaintiffs have engaged in criminal conduct, and therefore, such statements are actionable as libel *per se*.
78. Defendants' statements tend to and were intended to injure Plaintiffs in their trade, business, and profession, and therefore, such statements are actionable as libel *per se*.
79. Defendants' statements subject Plaintiffs to hatred, distrust, ridicule, contempt, and/or disgrace, and therefore, such statements are actionable as libel *per se*.
80. Defendants published the defamatory statements and information knowing that (and intending that) it would harm Plaintiffs' reputations and future business endeavors.
81. Defendants made the statements with actual express malice and with the intent of discrediting and harming Plaintiffs' business reputation.

82. Defendants will continue to make such statements without Court intervention.

83. As a direct result of the defamatory statements, Plaintiffs continue to suffer damages, including but not limited to damages to their personal and business reputation.

84. As a direct result of the defamatory statements, Plaintiffs have and will lose business opportunities and have been severely damaged because of the publication of these false statements and accusations.

85. Defendants' publications were made with malice, entitling Plaintiffs to exemplary and punitive damages.

COUNT IV– INJURIOUS FALSEHOOD AND PRODUCT DISPARAGEMENT

86. Plaintiffs repeat and reallege Paragraphs 1 through 58 as if set forth herein.

87. Defendants intentionally made false statements to Google regarding Plaintiffs' business, ethics, conduct, and product.

88. Defendants acted with malice, in that they knew these statements were false, with the intent that Google would take down Plaintiffs' business page.

89. Defendants publicly admit to this intent and documented its conduct and the results on its own website.

90. Defendants' statements were the material and substantial (indeed, the only) reason that Google took action in relation to Plaintiffs' pages.

91. Plaintiff has suffered specific and measurable losses due to Defendants' conduct.

COUNT V – TORTIOUS INTERFERENCE WITH BUSINESS RELATIONS

92. Plaintiffs repeat and reallege Paragraphs 1 through 58 as if set forth herein.

93. Plaintiffs' Google business page is a primary generator of web traffic for Plaintiffs pages, and a primary source of information for consumers, through which Plaintiffs form business relationships.

94. Plaintiffs will derive future economic benefits from their relationship with Google.

95. Plaintiffs and Defendants are not in a contractual relationship.

96. Defendants knew that Plaintiffs and Google have a business relationship.

97. Defendants intentionally interfered with Plaintiffs and Google's business relationship.

98. Defendants interfered with Plaintiffs and Google's business relationship by submitting dozens of false reports claiming various types of wrongdoing, including copyright and trademark infringement.

99. Defendants had no privilege or right to interfere with the business relationship.

100. Plaintiffs have suffered economic injury as a result of Defendants' actions.

COUNT VI – FLORIDA DECEPTIVE AND UNFAIR TRADE PRACTICES ACT

101. Plaintiffs repeat and reallege Paragraphs 1 through 58 as if set forth herein.

102. Defendants have committed an unfair trade practice by submitting multiple takedown reports to Google relating to Plaintiffs' business with the knowledge that the claims are false.

103. Defendants' claims contain are material misrepresentations.

104. Defendants' actions are unfair, unconscionable, and deceptive, and offend established public policy,

105. Defendants' actions have caused loss to Plaintiffs, which is both quantifiable and unquantifiable.

106. Defendants' actions are causing irreparable harm to Florida consumers by taking away the consumer's ability to choose a business based on true and honest reviews and information.

107. Defendants will continue this activity without Court intervention.

WHEREFORE, Plaintiffs, James Oxendine and Southeast Bully Kennels LLC respectfully requests this Court render and order granting Plaintiffs:

A. A declaratory judgment that that Defendants and their subsidiaries and affiliated companies, their respective officers, directors, agents, servants, employees, representatives and attorneys, and those persons in active concert or participation with them who receive actual notice of the injunction order by personal or other service be preliminarily and permanently enjoined from:

   a. sending Notices of Claimed Infringement to Google concerning Plaintiffs;

   b. sending any other complaints containing allegations of infringement or other wrongdoing to Plaintiffs' third party Internet service providers or other vendors of goods and/or services; and

   c. interfering in any way with Plaintiffs' business on the Internet;

B. Damages according to proof but not less than $200,000.00;

C. That, because of the willful nature of Defendants' acts, the Court enter a judgment for treble the amount of the aforesaid damages;

D. That, because of the willful, intentional, and wrongful nature of Plaintiffs' acts, the Court award to Plaintiffs exemplary or punitive damages;

E. That Defendants' be required to pay to Plaintiffs their costs in this action, including all costs and attorneys' fees; and,

F. That Plaintiffs be granted such other and further relief as the Court deems just and proper.

Plaintiff demands a jury trial.

Dated: July 24, 2026

Respectfully submitted,

By: s/ *Lorri Lomnitzer*
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EXHIBIT A

DMCA (Copyright) Complaint to Google

SENDER	RECIPIENT	SUBMITTER
BULLY KING Magazine LLC	**Google LLC**	**Google LLC**
[Private]	[Private]	
US	Mountain View, CA, 94043, US	

Sent on April 04, 2026
COUNTRY: US us

Re: Unknown

NOTICE TYPE: DMCA

Copyright claim 1

KIND OF WORK: Unspecified

DESCRIPTION https://www.goodreads.com/book/show/[REDACTED]1-the-bully-bible https://www.magloft.com/launch/com.bullyking.magazine https://medium.com/bully-king-magazine circumvention content: This report concerns egregious technical circumvention and 512(f) fraud. The subject is utilizing a "Digital Clone" strategy by deploying stolen JSON-LD Schema and Stud Service tracker protocols. These technical scripts are proprietary technological protection measures (TPM) designed to manage and verify authentic breeding records. Furthermore, the subject is engaging in systemic Address Fraud, using a United States Postal Service (USPS) facility at 100 Waxhaw Pkwy #1302, Waxhaw, NC 28173 as a deceptive physical storefront to manipulate search rankings. "Suite #1302" is a documented P.O. Box, which is a direct violation of Google Business Profile

guidelines. The Target Domain is engaged in a "Competitor Shadowing" strategy, utilizing Content Relocation as an anti-DMCA tactic. Following the successful removal of specific infringing sub-pages from global search results, the Target Domain has systematically "scrubbed" and relocated the infringing content blocks directly to their Homepage to evade de-indexing while maintaining search engine rankings built on stolen intellectual property. The URL: https://southeastbullykennels.com/ contains unauthorized, verbatim reproductions of original literary content blocks from BULLY KING Magazine (Issues 2015–2017) and the book 'The Bully Bible' (ISBN [REDACTED]39). Thiis is a derivative work that replicates the proprietary structure, unique formatting, and specific educational phrasing originally published by BULLY KING at: https://www.magloft.com/launch/com.bullyking.magazine. This constitutes a 'relocation' of content intended to deceive the public into believing the registrant authored these educational standards A. The Breed Standard "Content Block" The Violation: Look for their posts explaining the Standard, Pocket, XL, and Classic classes. The Proof: BULLY KING Magazine established a specific "plain English" breakdown of ABKC standards in 2015. If their blog uses your specific height-to-weight ratios or the "compact vs. bulky" adjectives in the same order as The Bully Bible, it is a derivative work. Citing the Source: "This content block is a direct relocation of the 'Know the Classes' feature from BULLY KING Magazine, Issue 4 (2015)." B. The "History of the American Bully" Block The Violation: Many kennels copy the specific historical timeline (mentioning the late 80s/early 90s foundations) that you codified in your 2015-2017 digital issues. The Proof: Compare their "History" page to your Medium.com archives. If they mention the same foundation breeds in the same narrative sequence, it is an unauthorized derivative. C. Nutritional/Supplement Protocols The Violation: BULLY KING's 2016 issues featured specific "Bully Maintenance" guides. The Proof: Check their blog for "Top Tips for Bully Health." repurposed proprietary educational intellectual property. TIMEFRAME & RECIDIVISM Historical data via the Wayback Machine confirms that the Target Domain’s homepage was fundamentally restructured into a "Resource Hub" immediately following the de-indexing of their original infringing sub-pages. This proves willful intent to circumvent DMCA legal actions and maintain the benefits of the stolen content through URL relocation. VII. STATEMENT OF TRUTH & ACTION REQUESTED The current SEBK homepage serves as a Functional Clone of BULLY KING Magazine Original works, and the Venomline website & digital ecosystem. By relocating infringing content previously removed from search results to the homepage, the Target Domain is in continuous violation of the Digital Millennium Copyright Act. Requested Action: - Immediate removal of the infringing text blocks from the Target Domain homepage. Permanent de-indexing of the homepage due to the repeated and willful relocation of de-indexed infringing material. VIII. CONTACT INFORMATION Name: Matt Siebenthal BULLY KING Magazine LLC Address: 7904 Aztec Ct. Lake Worth, FL 33463 Phone: [REDACTED] Email: [REDACTED] IV. STATUTORY DECLARATIONS Good Faith Belief: I have a good faith belief that use of the

material in the manner complained of is not authorized by the copyright owner, its agent, or the law. Accuracy and Penalty of Perjury: I declare under penalty of perjury, pursuant to the laws of the United States of America, that the information in this notification is accurate and that I am the owner of the exclusive rights that are allegedly infringed, or am authorized to act on behalf of the owner of the exclusive rights. X. SIGNATURE Expeditious Removal Requested: Pursuant to the DMCA, I request that you act expeditiously to remove or disable access to the infringing material located on the target homepage. Signed: ___Matt Siebenthal__ Date: April 4, 2026 _____ BULLY KING Magazine's business assets are currently under a Manual High-Priority Review (Case Ref: #8-[REDACTED]85). We have documented 60+ instances of DMCA Perjury and Coordinated Inauthentic Behavior within the last 48 hours.. Forensic evidence of content mirroring and automated reporting sabotage has been submitted for manual override to protect against ongoing Tortious Interference. ⚠️ URGENT: REPORTING SYSTEM ABUSE IN PROGRESS ⚠️ TARGET: Venomline® (Texas Size Bullies-Delray Beach, FL / BULLY KING Magazine / Matt Siebenthal PERPETRATOR: James Oxendine (SEBK) Southeast Bully Kennels @Southeastbullykennels on IG VIOLATION: 60+ Fraudulent DMCA Strikes in 48 Hours. This is a documented campaign of Digital Sabotage. circumvention mechanism: circumvention software

ORIGINAL URLS: No copyrighted URLs were submitted.

ALLEGEDLY INFRINGING URLS:

01. southeastbullykennels.com - 16 URLs
02. venomlinebullies.com - 3 URLs
03. s[redacted]s.com - 1 URL

Click here to request access and see full URLs.

JURISDICTIONS US

TOPICS

Anticircumvention (DMCA), Copyright

TAGS

EXHIBIT B

VENOMLINE COPYRIGHT & IP PROTECTION POLICY (2026)

COPYRIGHT PROTECTION POLICY - CHAIN OF CUSTODY VERIFIED - MASTER LEGAL REVIEW UPDATE: JULY 6, 2026

OWNERSHIP POLICY - DIGITAL CHAIN OF CUSTODY - PLATFORM ABUSE EVIDENCE

VENOMLINE COPYRIGHT & INTELLECTUAL PROPERTY PROTECTION POLICY

Public policy and preservation record confirming ownership of Texas Size Bullies and Venomline content, publication precedence, enforcement outcomes, Search Console visibility damage, Google Business Profile

MASTER FILE: **VNL-SEBK-2026-MASTER**

SUBJECT OF RECORD: **James Oxendine / Southeast Bully Kennels**

ORIGIN LAYER: **Texas Size Bullies / Venomline**

ORIGIN ARCHIVES: **2015-present**

VISIBILITY EXHIBIT: **Google Search Console 11/2024 drop preserved**

PLATFORM EXHIBIT: **Meta page-at-risk / reporting abuse**

review-manipulation concerns, Meta platform-abuse evidence, harassment/interference exhibits, litigation context, and evidence-retention standards.

preserved

GBP EXHIBIT: Review velocity + USPS / PO box issue preserved

COURT CONTEXT: Oxendine v. Blockline Bullies, 2:24-cv-00740

Last Updated: July 6, 2026

Case ID: VNL-SEBK-2026-MASTER

Status: Active Preservation & Enforcement

REQUEST DOCUMENTATION PACKET

OPEN FORENSIC AUDIT INDEX

Summary Evidence Standard Chain of Title Repositories

Traffic Drop GBP Evidence Meta Abuse Court Context

Forensic Matrix Harassment Interference Replication

Enforcement Platform Request Preservation Declaration

References

EXECUTIVE SUMMARY

MASTER LEGAL-REVIEW SUMMARY

Venomline Bullies / Texas Size Bullies, owned by **Matt Siebenthal**, preserves this master page as the public-facing summary of a multi-year digital chain-of-custody record involving original authorship, alleged content replication, platform-abuse reporting, Google Business Profile manipulation concerns, search-visibility damage, harassment communications, client-interference

evidence, and enforcement outcomes tied to **Southeast Bully Kennels (SEBK)** and **James Oxendine**.

This page is built to separate **verified records**, **preserved screenshots**, **platform-verifiable allegations**, and **requests for independent review.** It is designed for review by counsel, platform Trust & Safety teams, search-quality teams, copyright teams, and business-listing integrity teams.

Core position: Venomline's forensic record shows long-running publication continuity from Texas Size Bullies into Venomline, followed by later third-party materials that Venomline contends mirror proprietary wording, structure, imagery, business logic, and brand authority. The record also preserves evidence of report abuse, review manipulation concerns, address-eligibility concerns, and measurable visibility damage requiring legal and platform review.

EVIDENCE STANDARD

LEGAL-REVIEW CLASSIFICATION

To make the record precise, every major issue below is classified by the strength of the source record. This prevents unsupported overstatement while preserving the full factual pattern for legal review.

CLASSIFICATION	MEANING	EXAMPLES IN THIS RECORD
Verified public record	Can be independently checked from public sources or official platform policy.	Federal docket context; Google Business Profile policy prohibiting PO box addresses.

CLASSIFICATION	MEANING	EXAMPLES IN THIS RECORD
Preserved screenshot / owner record	Evidence preserved by Venomline and available for review, but requiring platform logs or original files for final authentication.	Google Search Console drop, Meta page-at-risk screenshots, review screenshots, text messages, Ahrefs backlink-spam screenshots.
Platform-verifiable allegation	Requires Google, Meta, Medium, Pinterest, host, registrar, or search-engine logs to confirm identity, timing, and account linkage.	False reports, review velocity manipulation, IP clustering, claimant pattern, report timing, account-linkage review.
Legal conclusion reserved	Final legal liability must be determined by counsel, platform adjudication, or a court.	DMCA misrepresentation, tortious interference, harassment, deceptive trade practice, unfair competition.

Important: This page is not a substitute for a court finding. It preserves facts, screenshots, source references, platform-policy issues, and requests for manual review. Where identity, intent, or causation depends on platform logs, this page expressly requests preservation and production of those logs.

SECTION I

CHAIN OF TITLE & AUTHORITATIVE ORIGIN

I, **Matt Siebenthal**, am the original creator and custodian of the intellectual property now operated under the **Venomline** brand. This IP includes educational

articles, health policies, stud-service protocols, breeding logistics, brand language, media, and operational materials first published through **Texas Size Bullies** and later consolidated into Venomline.

Ownership Notice: As of January 2020, all Texas Size Bullies bloodline materials, proprietary pedigree data, digital media assets, educational content, and operational text were absorbed into the Venomline global brand. This includes legacy content hosted on **texassizebullies.wordpress.com**.

Authoritative Origin Sources

- **Texas Size Bullies WordPress** - primary legacy content host.
- **WordPress Archive Index** - timestamped archive layer.
- **Texas Size Bullies .com Archive** - legacy domain archive index.

Protected Asset Categories

- Health guarantee language and breeding protocols.
- Stud-service logistics, shipping workflow, and client guidance.
- American Bully educational articles and glossary-style content.
- Photos, videos, screenshots, personal likeness, and brand graphics.
- Brand slogans, narrative identity, page structures, and proprietary writing style.

SECTION II

OFFICIAL AUTHORSHIP REPOSITORIES & OWNERSHIP SIGNALS

Venomline preserves authorship continuity across first-party publishing, independent media, magazine distribution, app-based publishing, and book-reference platforms. These records reinforce temporal precedence and editorial control.

BULLY KING Magazine - Medium Publication

BULLY KING Magazine - Magzter

Print and digital issue distribution supporting publishing history.

Independent publication continuity and subject-matter authority.

BULLY KING Magazine App - MagLoft

App-based publishing footprint and entity continuity.

The Bully Bible - Goodreads

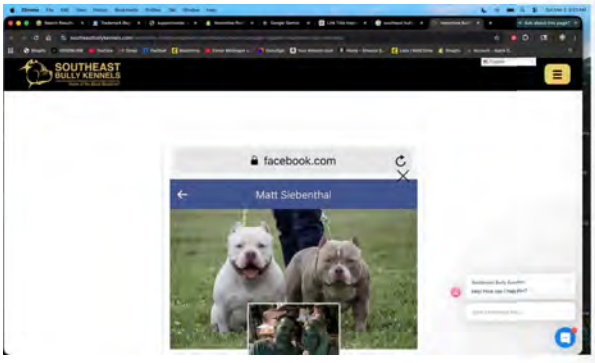
Book-reference signal supporting earlier authorship and subject-matter continuity.

SECTION II-C — UNAUTHORIZED USE OF PERSONAL LIKENESS & FAMILY PHOTOGRAPHY

Venomline has preserved evidence showing that a personal Facebook profile photograph depicting **Matt Siebenthal and his wife**, along with Venomline-owned dog photography, appeared on the Southeast Bully Kennels website without authorization.

> These exhibits are preserved for legal review, platform Trust & Safety review, copyright enforcement, privacy review, and business-interference documentation.

Exhibit PL-01 — Third-Party Website Publication



Preserved screenshot of the Southeast Bully Kennels website displaying Matt Siebenthal's personal Facebook profile image, family photograph, and Venomline-owned dog imagery.

Exhibit PL-02 — Personal Profile Capture

Preserved Facebook profile screenshot documenting the personal profile associated with the reproduced family photograph

Preserved screenshot showing the personal profile context associated with the reproduced family photograph. Personal identifiers may be redacted where appropriate.

Exhibit PL-03 — Original Venomline-Owned Photograph

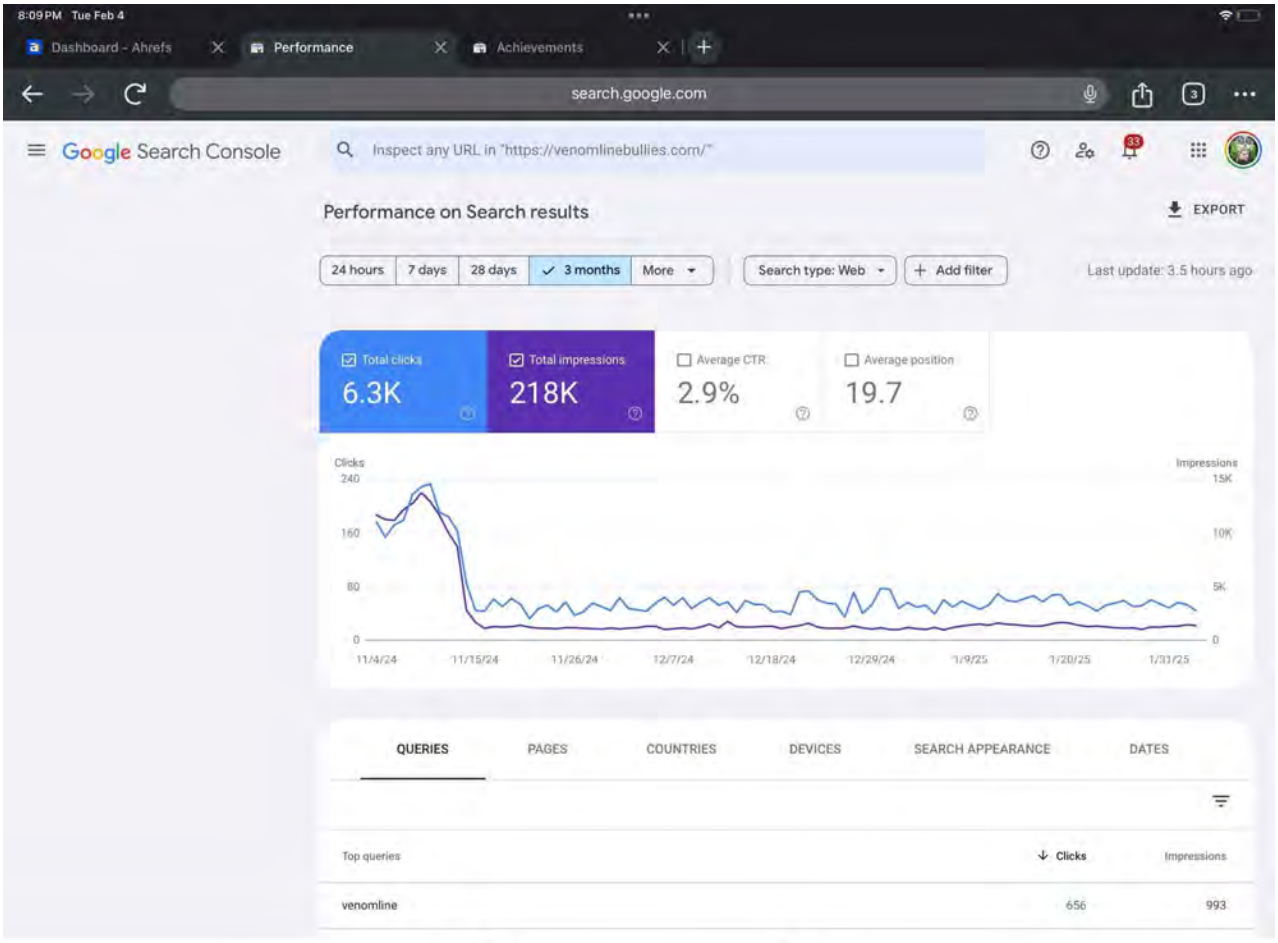


Original Venomline-owned photograph preserved for comparison, authorship, chain-of-custody, and image-provenance review.

Evidentiary Significance: These exhibits document what Venomline contends is *unauthorized republication* of personal likeness, family imagery, and original Venomline dog photography on a competing commercial website.

SECTION III

GOOGLE SEARCH CONSOLE VISIBILITY-DAMAGE EXHIBIT



Venomline preserves Google Search Console screenshots showing a sharp and sustained organic-search visibility discontinuity for `https://venomlinebullies.com/` during the documented SEBK targeting and reporting-abuse period. These screenshots are preserved as a damages and causation-review exhibit.

6.3K

TOTAL CLICKS

3-month Search Console capture; web search type.

218K

TOTAL IMPRESSIONS

Same Search Console capture.

2.9%

AVERAGE CTR

Shown in preserved Search Console screenshot.

19.7

AVERAGE POSITION

Shown in preserved Search Console screenshot.

Observed Before / After Pattern

- Before the drop, daily clicks are visibly clustered around approximately **160-240 clicks/day**.
- A cliff-like drop appears around **mid-November 2024**, after which daily clicks are visibly reduced to approximately **40-80 clicks/day**.
- Impressions similarly collapse from high-thousands / low-five-figure daily range into a much lower baseline.
- The reduced level persists through the visible 3-month reporting window, supporting a sustained visibility-damage exhibit.

Legal-Review Use

- Preserved as evidence of measurable search visibility harm.
- Correlated with the alleged targeting period, but final causation requires Google, host, Search Console, security, and reporting logs.
- Relevant to damages, business interruption, search suppression, and reporting-abuse review.
- Should be paired with disavow records, toxic-link exports, DMCA notices, and enforcement timestamps.

Evidence Image Slot - Search Console Exhibit A

Upload to Shopify Files and replace this placeholder with the CDN URL for:

`IMG_8196_Original(2).JPG`

Caption: Google Search Console 3-month capture showing 6.3K clicks, 218K impressions, 2.9% CTR, average position 19.7, and mid-November traffic collapse.

Evidence Image Slot - Search Console Exhibit B

Upload to Shopify Files and replace this placeholder with the CDN URL for:

`IMG_8506_Original(1).PNG`

Caption: Mobile Google Search Console capture showing 5.67K clicks, 165K impressions, 3.4% CTR, and sustained lower baseline after the visible drop.

Evidence Image Slot - Toxic Link / SEO Exhibit

Upload the Ahrefs screenshots and replace with CDN URLs for: `Screenshot 2026-07-05 at 1.42.14 PM.png`, `Screenshot 2026-07-05 at 1.42.53 PM(1).png`, `Screenshot 2026-07-05 at 1.43.19 PM(1).png`, and `Screenshot 2026-07-05 at 1.43.38 PM(1).png`

Caption: Ahrefs snapshots preserving backlink-spam / referring-domain surge indicators, including 329 referring domains, 608 backlinks, multiple spam-labeled domains, and July 2026 first-seen dates.

Legal framing: This section does not ask readers to infer algorithmic causation without platform logs. It preserves a visible traffic discontinuity, the timing, the surrounding allegations, and the technical evidence needed for counsel and Google Search Quality review.

SECTION IV

GOOGLE BUSINESS PROFILE: REVIEW MANIPULATION & ADDRESS ELIGIBILITY EXHIBIT

Venomline preserves evidence and a separate Google Business Profile complaint packet concerning alleged coordinated inauthentic engagement, review padding, review suppression, and deceptive business-location representation tied to the Southeast Bully Kennels listing.

Review-Pattern Evidence

- Preserved complaint states the listing repeatedly received concentrated bursts of 5-star reviews within 24-48 hours after negative consumer reviews.
- Complaint identifies low-trust reviewer indicators such as 0-1 prior reviews, no media, and limited local history.
- Screenshot set preserves a visible transition from a listing with **4.6 stars / 130 reviews** to a later display showing **no ratings or reviews**, indicating review purge,

Address Eligibility Evidence

- Complaint identifies **100 Waxhaw Pkwy Unit 1302, Waxhaw, NC** as corresponding to a United States Postal Service location.
- The complaint states "Unit 1302" is a PO box / postal-unit style address, not a customer-accessible kennel location.
- Google Business Profile policy states businesses with PO box addresses are not permitted and can be suspended.

removal, or display suppression requiring Google verification.

- Requested review: IP clustering analysis, account-linkage review, and velocity anomaly detection.

- Requested review: listing eligibility verification, address audit, and manual Trust & Safety review.

Evidence Image Slot - GBP Reviews Before/After

Upload to Shopify Files and replace with CDN URLs for: `IMG_0051 2(1).jpg` and `IMG_0287(1).jpg`

Caption: Google listing screenshot showing 4.6 rating with 130 reviews, followed by later screenshot showing no ratings or reviews.

Evidence Image Slot - Address / USPS Exhibit

Upload to Shopify Files and replace with CDN URLs for: `Screenshot 2026-03-26 at 1.35.28 PM 2(1).png` and `Screenshot 2026-03-26 at 1.36.38 PM 2(1).png`

Caption: Google Maps / Street View evidence showing the Waxhaw address area and USPS location context.

Enforcement request preserved: Immediate manual review by Google Trust & Safety, listing eligibility verification, review-integrity audit, removal of fraudulent reviews if confirmed, and potential suspension pending investigation.

SECTION V

META / FACEBOOK PLATFORM-ABUSE EXHIBIT

Venomline preserves a formal Meta escalation packet alleging platform abuse, harassment, bad-faith reporting, false copyright claims, cross-platform report timing, account-standing damage, revenue harm, and customer-relationship interference.

178K

FB PAGE FOLLOWERS

219K

28-DAY VIEWS

Preserved dashboard shows 219,164 views.

+727%

VIEW GROWTH

Strong audience demand despite platform-risk

Texas Size Bullies-Delray Beach, FL page shown in preserved dashboard.

warning.

1

OPEN SUPPORT TICKET

Preserved professional-status page shows support ticket open.

Preserved Meta Harm Categories

- Loss or risk of monetization and revenue.
- Removal of legitimate sales and breeding content.
- Suppression of account visibility and page standing.
- Interference with customer relationships.
- Reputational harm caused by repeated false claims.

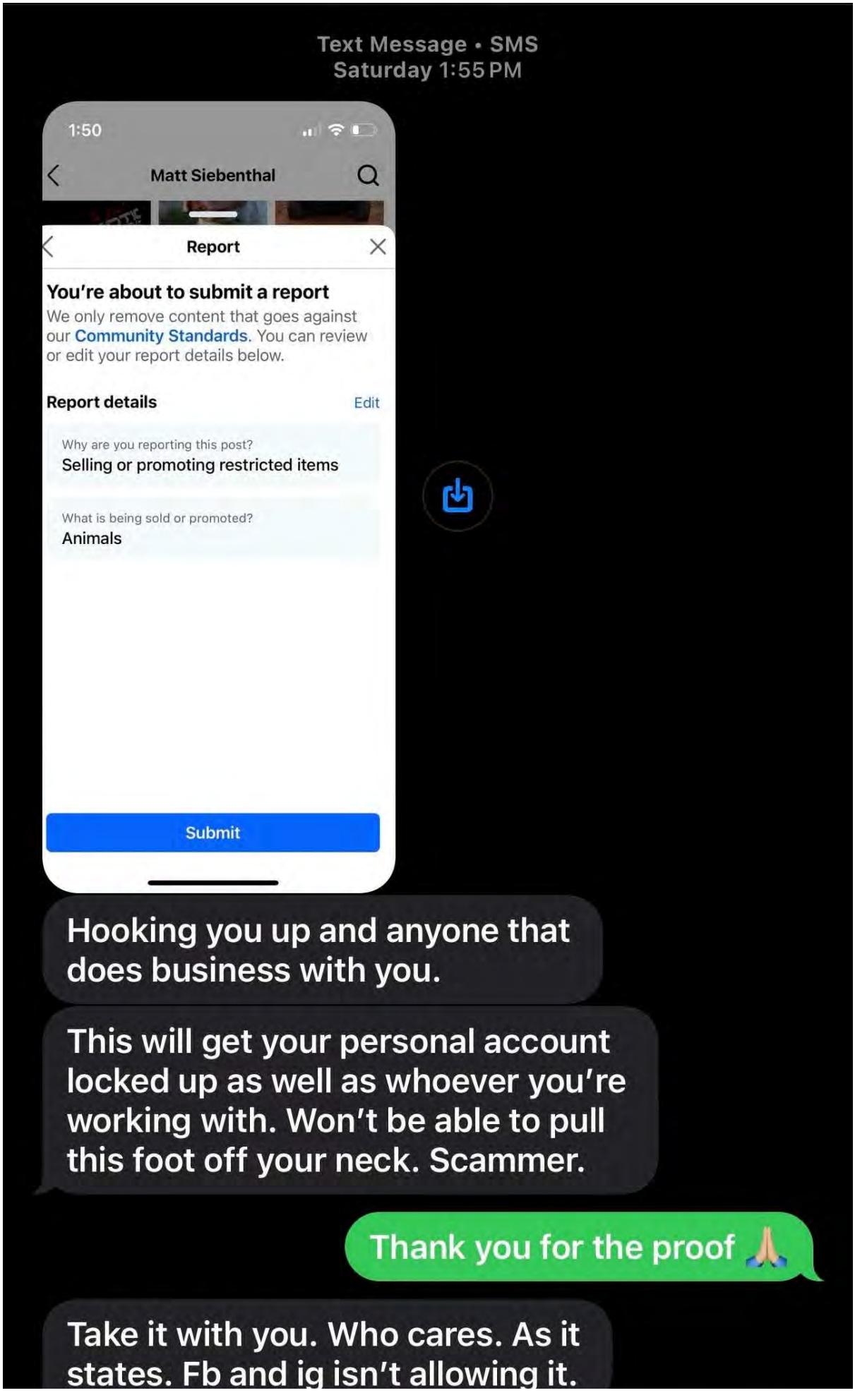
Requested Meta Action

- Manual review of enforcement actions tied to the reporting party.
- Restoration of content or account features removed through false reports.
- Investigation into repeat abuse of Meta reporting systems.
- Safeguards preventing further automated actions initiated by the same party or linked entities.
- High-risk / repeat bad-faith claimant flagging if supported by internal logs.

Evidence Image Slot - Meta Page at Risk

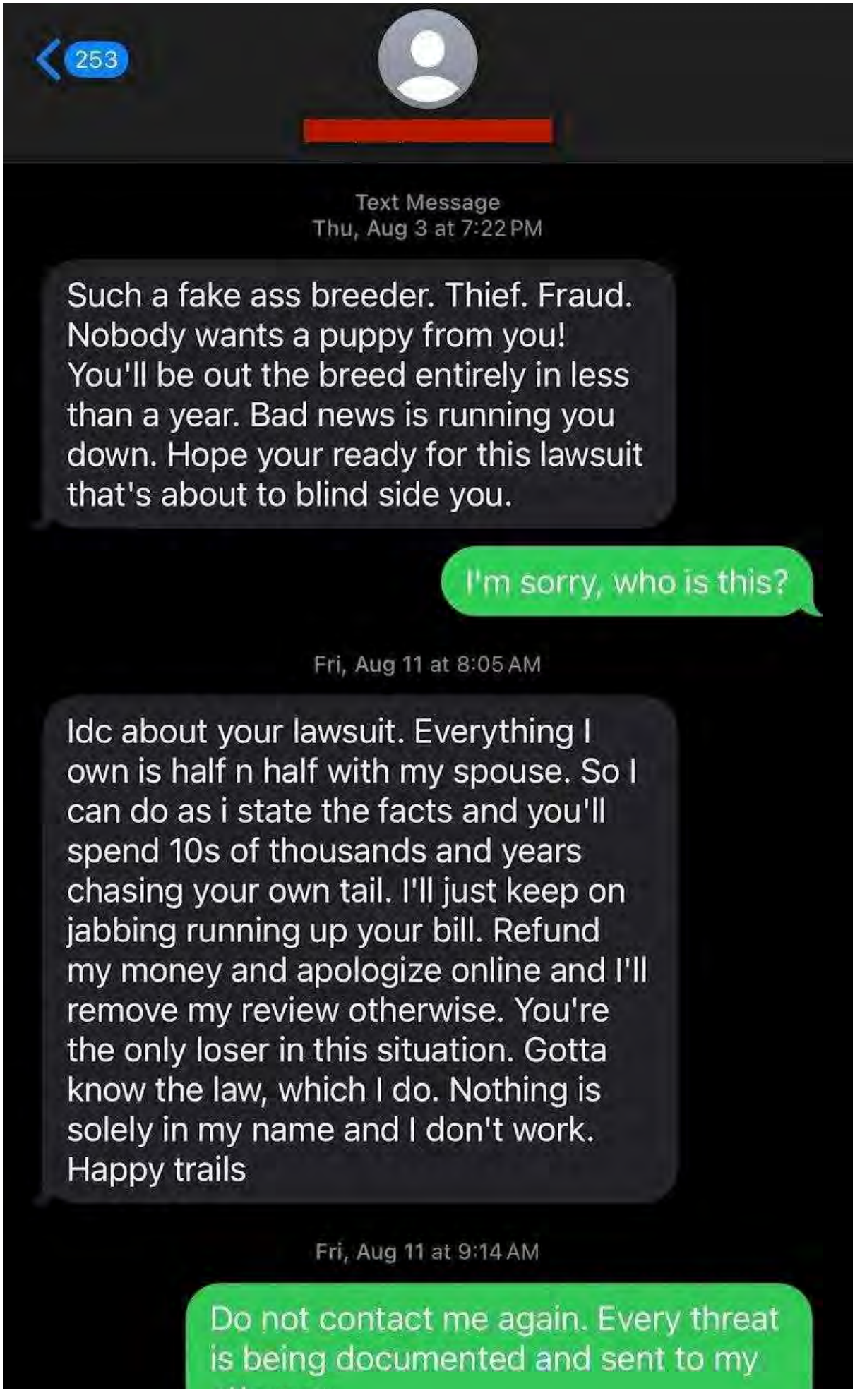
Caption: Professional dashboard showing Texas Size Bullies-Delray Beach, FL, 178K followers, page-at-risk status, monetization context, and open support ticket.

Evidence Image Slot - Reporting Threat


Text Message • SMS
Saturday 1:55 PM
1:50
Matt Siebenthal
Report
You're about to submit a report
We only remove content that goes against our Community Standards. You can review or edit your report details below.
Report details
Edit
Why are you reporting this post?
Selling or promoting restricted items
What is being sold or promoted?
Animals
Submit
Hooking you up and anyone that does business with you.
This will get your personal account locked up as well as whoever you're working with. Won't be able to pull this foot off your neck. Scammer.
Thank you for the proof 🙏
Take it with you. Who cares. As it states. Fb and ig isn't allowing it.



Caption: Preserved text-message exhibit showing a screenshot of a report flow and statements threatening account lock-up / reporting impact.


253
[redacted]
Text Message
Thu, Aug 3 at 7:22 PM
Such a fake ass breeder. Thief. Fraud. Nobody wants a puppy from you! You'll be out the breed entirely in less than a year. Bad news is running you down. Hope your ready for this lawsuit that's about to blind side you.
I'm sorry, who is this?
Fri, Aug 11 at 8:05 AM
Idc about your lawsuit. Everything I own is half n half with my spouse. So I can do as i state the facts and you'll spend 10s of thousands and years chasing your own tail. I'll just keep on jabbing running up your bill. Refund my money and apologize online and I'll remove my review otherwise. You're the only loser in this situation. Gotta know the law, which I do. Nothing is solely in my name and I don't work. Happy trails
Fri, Aug 11 at 9:14 AM
Do not contact me again. Every threat is being documented and sent to my

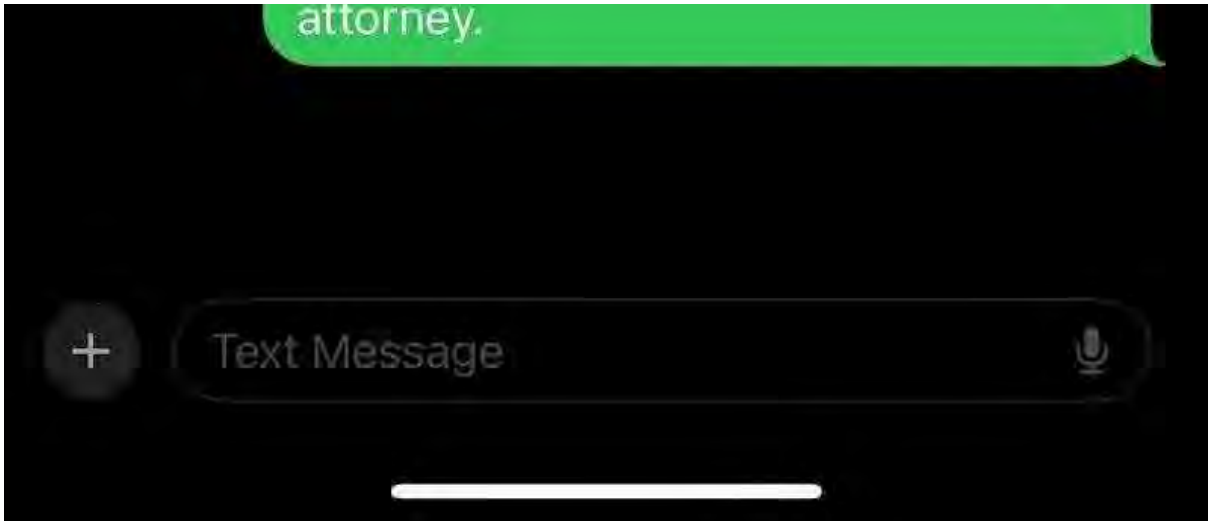
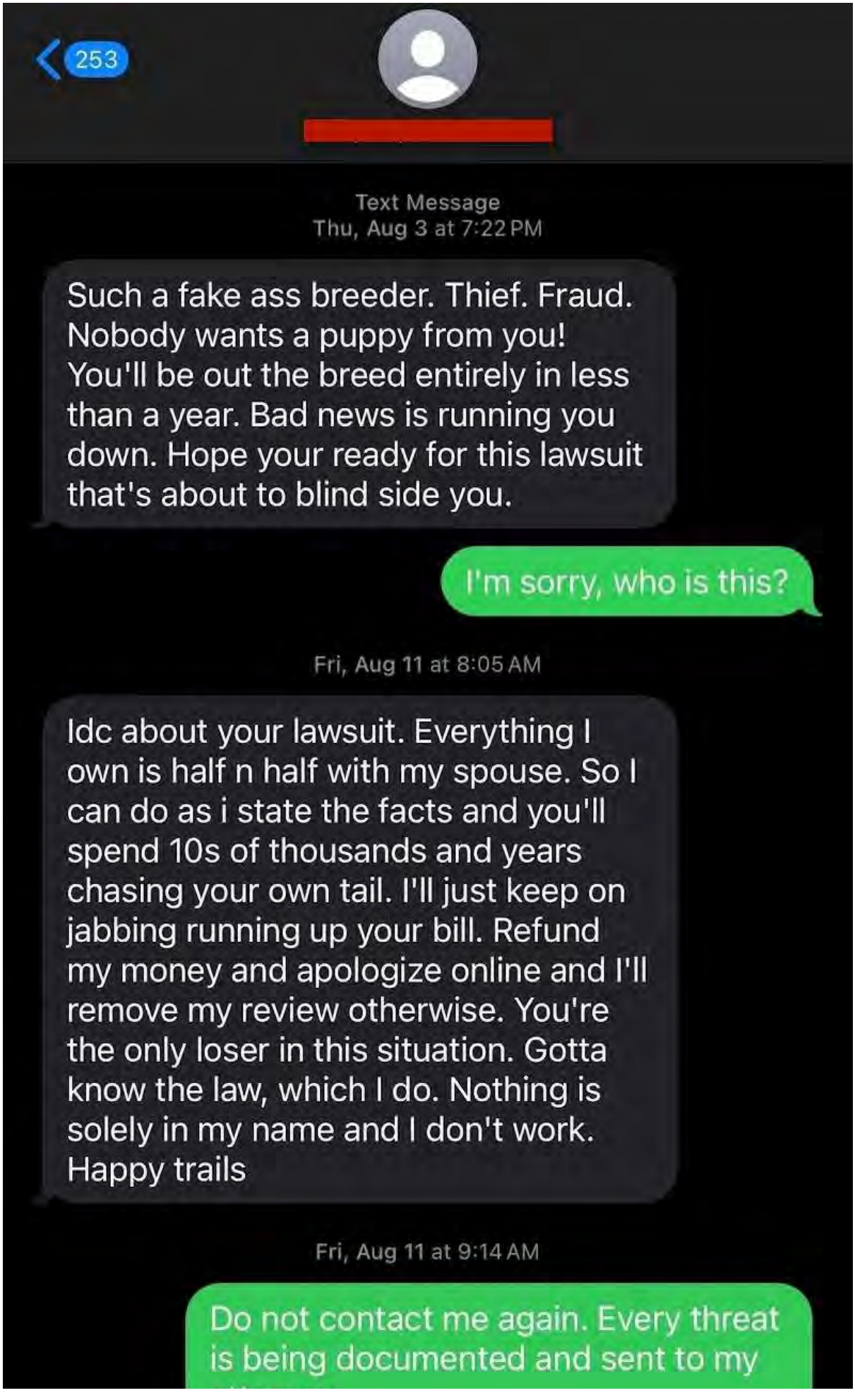
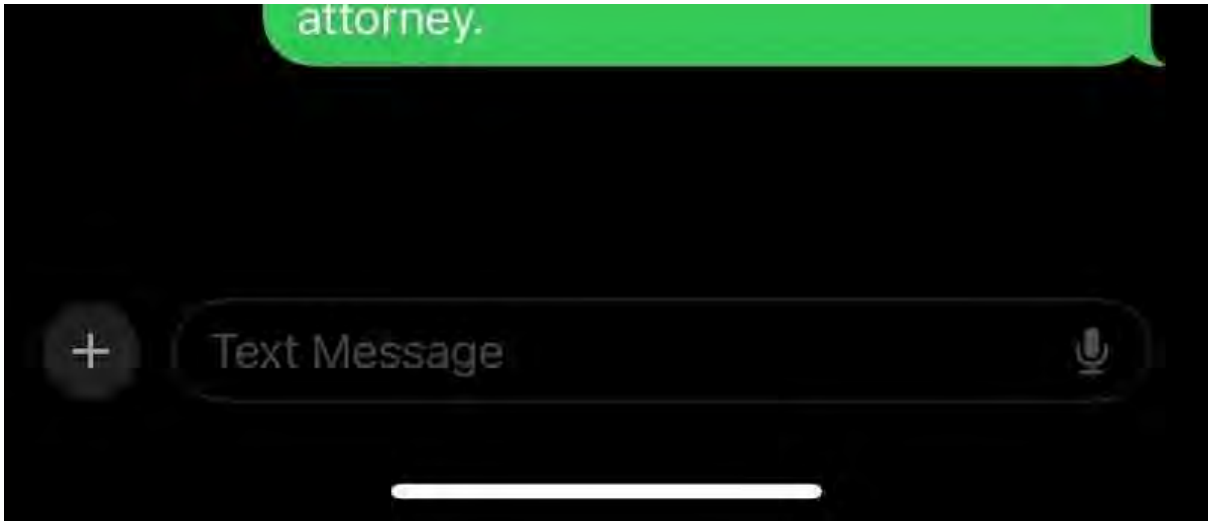


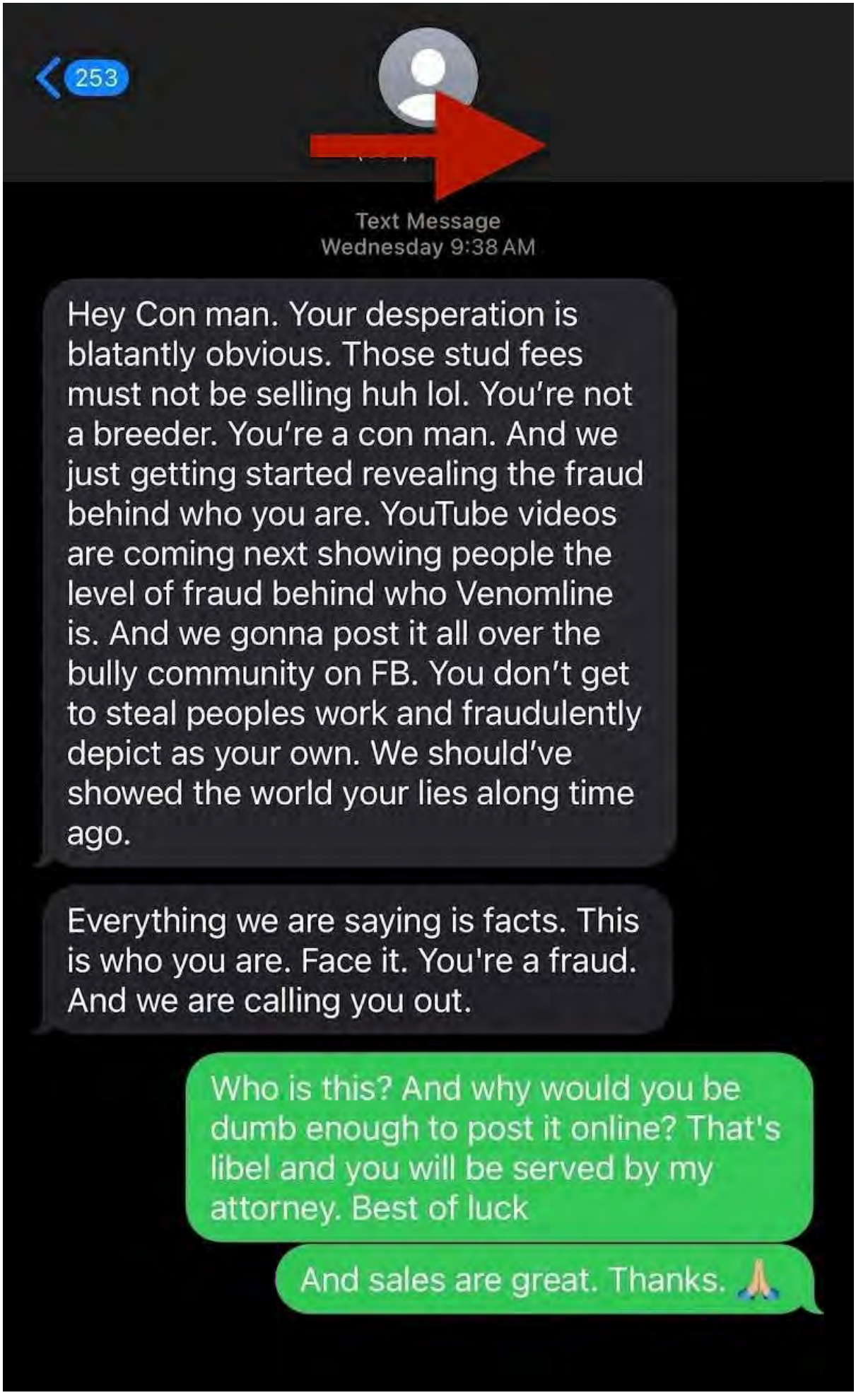
Exhibit H-01 — Threatening SMS Communication Referencing Lawsuit, Financial Burden, and Review Removal

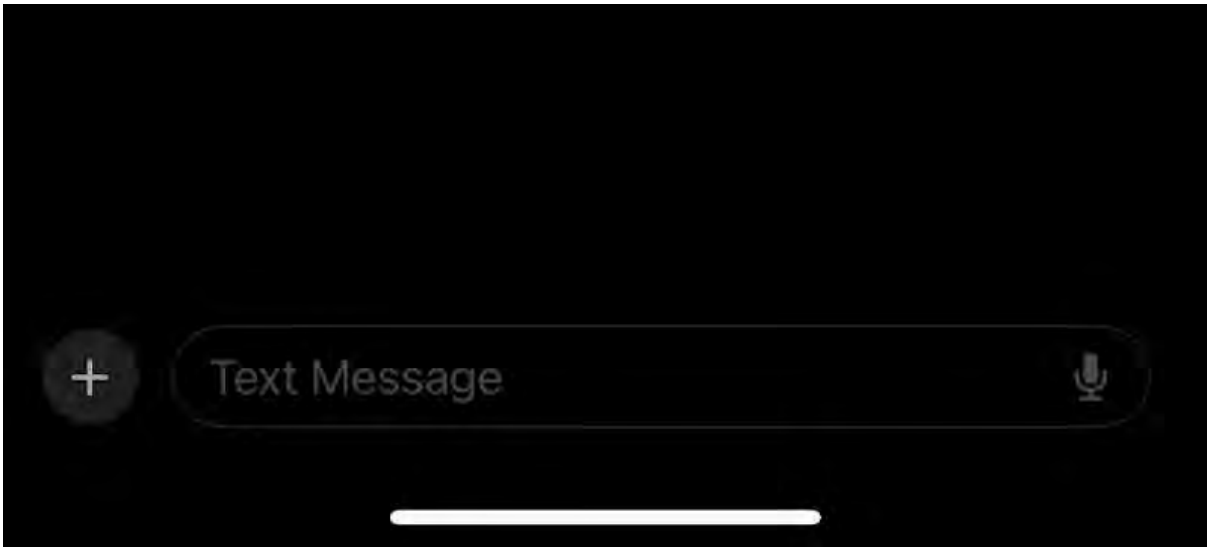

253
[redacted]
Text Message
Thu, Aug 3 at 7:22 PM
Such a fake ass breeder. Thief. Fraud. Nobody wants a puppy from you! You'll be out the breed entirely in less than a year. Bad news is running you down. Hope your ready for this lawsuit that's about to blind side you.
I'm sorry, who is this?
Fri, Aug 11 at 8:05 AM
Idc about your lawsuit. Everything I own is half n half with my spouse. So I can do as i state the facts and you'll spend 10s of thousands and years chasing your own tail. I'll just keep on jabbing running up your bill. Refund my money and apologize online and I'll remove my review otherwise. You're the only loser in this situation. Gotta know the law, which I do. Nothing is solely in my name and I don't work. Happy trails
Fri, Aug 11 at 9:14 AM
Do not contact me again. Every threat is being documented and sent to my



Preserved screenshot of an unsolicited text-message exchange in which the sender calls Venomline a “fake” breeder, “thief,” and “fraud,” predicts that Venomline will be “out the breed,” references a lawsuit, states that they will continue “jabbing” to run up legal bills, and conditions removal of a review on a refund and public apology. This image is preserved as evidence of ongoing harassment, reputational targeting, review-related pressure, and attempted intimidation.

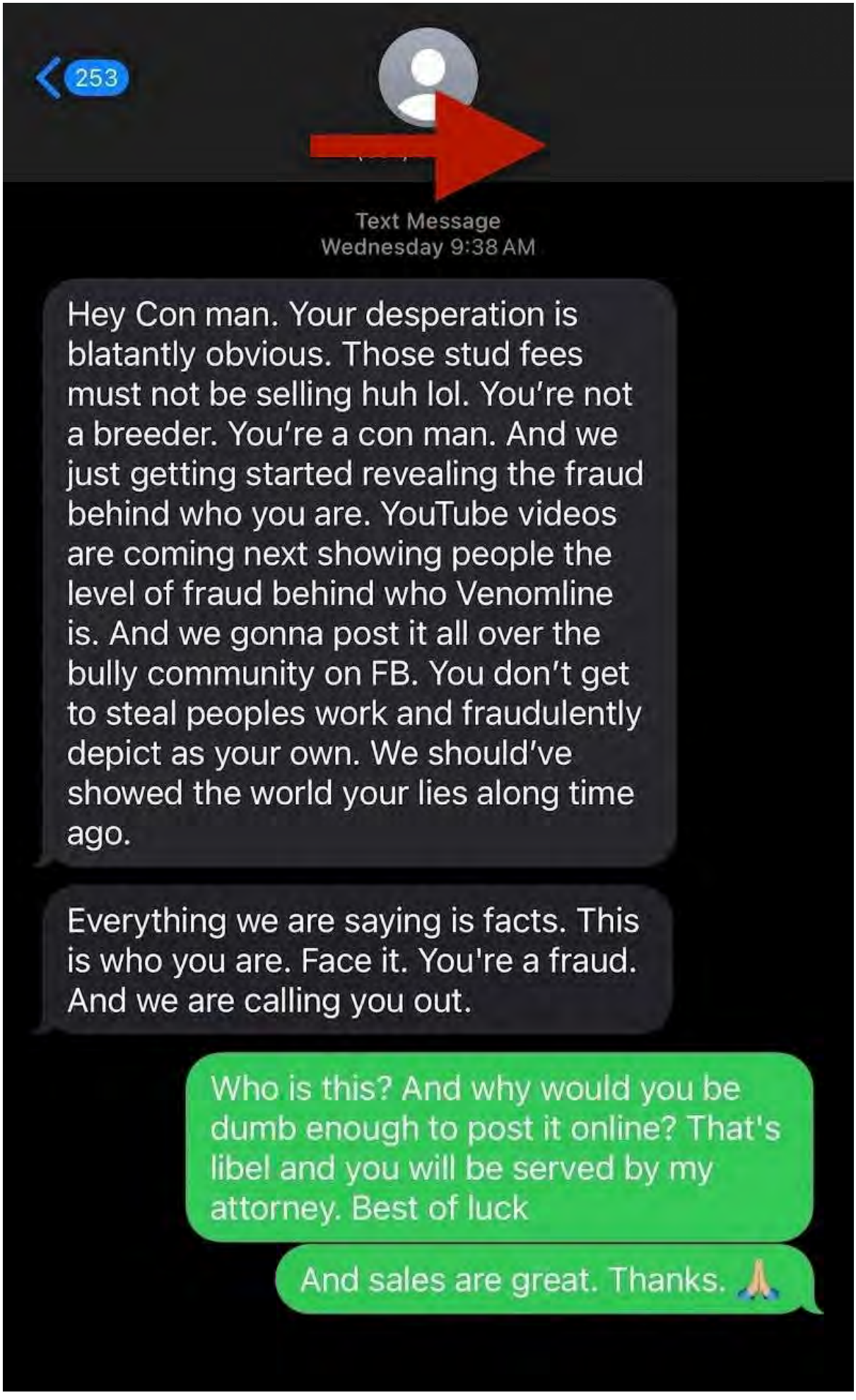
Exhibit H-02 — Coordinated Harassment Message Threatening Public Campaign Across YouTube and Facebook

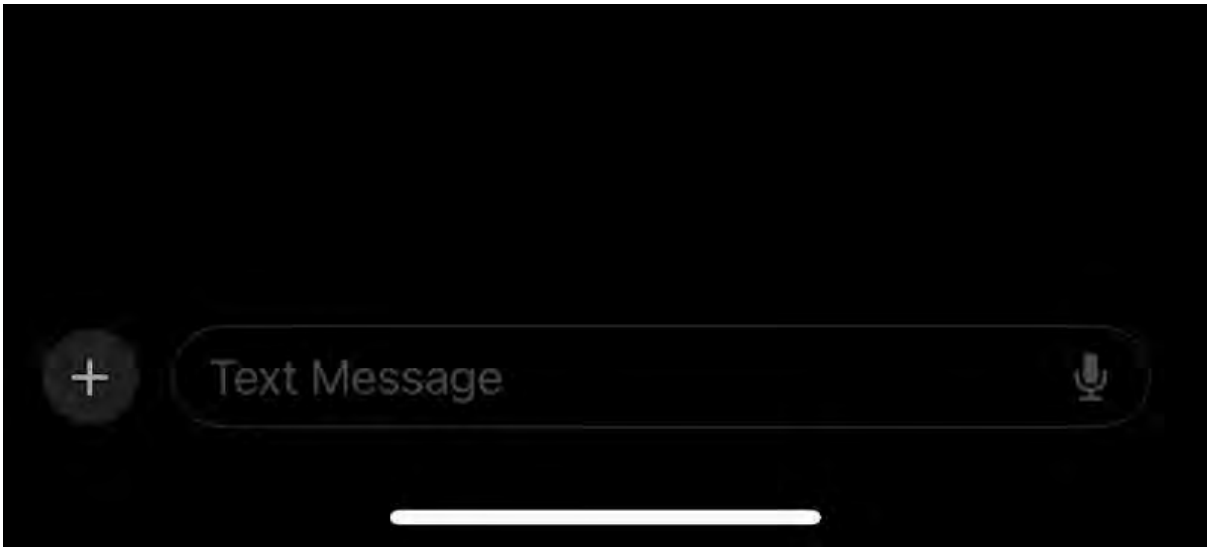

253
Text Message
Wednesday 9:38 AM
Hey Con man. Your desperation is blatantly obvious. Those stud fees must not be selling huh lol. You're not a breeder. You're a con man. And we just getting started revealing the fraud behind who you are. YouTube videos are coming next showing people the level of fraud behind who Venomline is. And we gonna post it all over the bully community on FB. You don't get to steal peoples work and fraudulently depict as your own. We should've showed the world your lies along time ago.
Everything we are saying is facts. This is who you are. Face it. You're a fraud. And we are calling you out.
Who is this? And why would you be dumb enough to post it online? That's libel and you will be served by my attorney. Best of luck
And sales are great. Thanks. 🙏



Preserved screenshot of an unsolicited text-message exchange in which the sender calls Venomline a “con man” and “fraud,” states that “YouTube videos are coming next,” and threatens to post allegations “all over the bully community on FB.” This image is preserved as evidence of an ongoing reputation-attack campaign, planned public amplification, targeted harassment, and attempted business disruption.

Exhibit H-03 — Third-Party Client/Community Message Disparaging Venomline Breeding Relationships


253
Text Message
Wednesday 9:38 AM
Hey Con man. Your desperation is blatantly obvious. Those stud fees must not be selling huh lol. You're not a breeder. You're a con man. And we just getting started revealing the fraud behind who you are. YouTube videos are coming next showing people the level of fraud behind who Venomline is. And we gonna post it all over the bully community on FB. You don't get to steal peoples work and fraudulently depict as your own. We should've showed the world your lies along time ago.
Everything we are saying is facts. This is who you are. Face it. You're a fraud. And we are calling you out.
Who is this? And why would you be dumb enough to post it online? That's libel and you will be served by my attorney. Best of luck
And sales are great. Thanks. 🙏



Preserved screenshot of a group-message exchange in which the sender discourages breeding with Venomline, contacting Venomline clients stating that "only people that breed with Venomline are beginners," and claims Venomline "doesn't even use his own dogs." This image is preserved as evidence of ongoing disparagement, client interference, reputational harm, and attempted disruption of Venomline's breeding relationships.

SECTION VI

FEDERAL LITIGATION CONTEXT: OXENDINE V. BLOCKLINE BULLIES LLC

Venomline preserves the public docket and judgment context from **Oxendine v. Blockline Bullies L L C et al**, Case No. **2:24-cv-00740**, U.S. District Court for the Western District of Louisiana, as relevant background to the pattern of trademark overreach and competitor-targeting allegations.

RECORD POINT	PUBLIC RECORD SUMMARY	LEGAL-REVIEW RELEVANCE
Case filing	Public docket identifies the case as filed May 31, 2024 by James Oxendine doing business as Southeast Bully Kennels against Blockline Bullies LLC and Steven Coker.	Shows direct competitor trademark litigation involving the American Bully industry.
Claimed mark	The dispute concerned alleged trademark rights in the phrase "Block Bloodline."	Relevant to Venomline's stated concern about generic-term trademark overreach.
Judgment outcome	Public judgment records state defendants' summary judgment motion was granted, the "Block Bloodline" trademark was terminated, injunction relief was denied, and the case was dismissed with prejudice.	Relevant context for platform teams evaluating repeated claims of exclusive rights and competitor-targeting reports.
Use in this page	This page cites the case as background context only.	Venomline does not claim that the Blockline judgment adjudicates every issue in this separate SEBK/Venomline record.

PacerMonitor Docket Summary
Oxendine v. Blockline Bullies L L C et al, 2:24-cv-00740.

Justia Docket Summary
Public filing and party summary.

CaseMine Memorandum Ruling

Public decision text and generic-mark discussion.

Evidence Image Slot - Case Summary Graphic

Upload to Shopify Files and replace with CDN URL for:

`Southeast_Bully_Kennels_Fraud_Exposed_Bad_Breeders_2026(1).jpg`

Caption: Visual case-summary graphic reflecting the public judgment context; use alongside the docket links above.

SECTION VII

SUMMARY OF THE FORENSIC EVIDENCE MATRIX

The multi-year digital chain of custody compiled during this investigation provides a structural blueprint of the dispute. The following matrix summarizes the preserved comparison between the authentic Venomline / Texas Size Bullies timeline and the later documented SEBK pattern alleged in the forensic record.

CHRONOLOGICAL CONTINUITY

FACTOR	VENOMLINE / TSB ORIGIN	LATER SEBK PATTERN
Timing, archive continuity, publication precedence.	Server logs, web archive captures, and long-running publication continuity establish core branding, educational articles, operational workflows, and structural philosophy since 2015.	Later publication timestamps and matching materials appear with a reported 18-24 month lag, aligning with the period Venomline identifies as a commercial hiatus / vulnerability window.

TEXTUAL & CODE ALIGNMENT

FACTOR	VENOMLINE / TSB ORIGIN	LATER SEBK PATTERN
Wording, headings, sequence, page scaffolding, and metadata.	Original authorship of signature slogans, health guarantees, contracts, stud protocols, and proprietary legal / operational language.	Forensic redline materials preserve claimed high-percentage structural overlap, synonym-swapping, retained ordering, and

		copied source-code / alt-tag indicators.

LINGUISTIC FINGERPRINTS

FACTOR	VENOMLINE / TSB ORIGIN	LATER SEBK PATTERN
Typos, uncommon wording, phrase residue, and duplicated idiosyncrasies.	Natural text evolution across years of updates with specific vocabulary, veterinary terminology, and legacy quirks.	Preserved allegations identify 12+ matching typographical fingerprints, including the unique spelling anomaly "Bordetilla."

REPUTATION PROFILE STATUS

FACTOR	VENOMLINE / TSB ORIGIN	LATER SEBK PATTERN
Reviews, search footprint, platform status, and trust signals.	Organic development of reviews, indexed content, publishing authority, and long-standing domain footprint.	Preserved review screenshots and complaint materials allege review-padding, purge events, and de-index / purge outcomes requiring platform verification.

PRODUCTION CREDIBILITY

FACTOR	VENOMLINE / TSB ORIGIN	LATER SEBK PATTERN
Original production claims, dog lineage, ABKC achievements, and show-record support.	Venomline preserves champion title history, ring records, original production history, and long-running breed-specific documentation.	Forensic record alleges unsupported or unverifiable production claims paired with copied explanatory text and borrowed authority signals.

Evidence Image Slot - Forensic Matrix Graphic

Upload to Shopify Files and replace with CDN URL for:

`Southeast_bully_kennels_content_theft_allegations_forensic_evidence(2).png`

Caption: Summary of forensic evidence matrix contrasting Venomline / Texas Size Bullies origin evidence against later SEBK patterns.

SECTION VIII

HARASSMENT, REPUTATION ATTACKS & REVIEW ABUSE EVIDENCE

Venomline preserves communications and review-related activity it characterizes as harassment, reputational targeting, and business disruption. The public version summarizes the conduct while preserving raw screenshots, timestamps, phone numbers, and reviewer identifiers offline for counsel and platform review.

Text-Message Evidence Categories

- Anonymous or unverified number communications calling Venomline a fraud / con man and threatening public posting.
- Messages referencing lawsuits, expenses, customer pressure, and future online attacks.
- Messages stating intent to report social accounts or get accounts locked.
- Messages referencing the bully community and planned YouTube / Facebook dissemination.

Review-Attack Evidence Categories

- One-star reviews by low-history profiles using similar narrative language.
- Repeated "dog broker" and "fraud" wording appearing across reviews and messages.
- Review screenshots showing little or no reviewer history.
- Venomline preserves these items for Google, counsel, and civil-damages review.

Evidence Image Slot - Text Message Exhibits

Upload to Shopify Files and replace with CDN URLs for: `CMBJE2292(2).JPG`, `IMG_5154_Original(1).JPG`, `IMG_5155_Original(1).JPG`, and `IMG_5305_Original(2).PNG`

Caption: Preserved text-message exhibits; public version should redact full phone numbers unless counsel approves publication.

Evidence Image Slot - Review Attack Exhibits

Upload to Shopify Files and replace with CDN URLs for: `GZWRE5864(2).JPG` and `IMG_5072_Original(1).JPG`

Caption: Preserved Google review screenshots showing low-history reviewer profiles and similar defamatory narrative patterns.

Publication caution: For the live public page, Venomline should redact phone numbers and private third-party identifiers unless counsel has cleared them for publication. The unredacted originals should remain preserved for discovery, platform review, and law-enforcement/civil-counsel use if needed.

SECTION IX

CLIENT INTERFERENCE, REPUTATION TARGETING & TRANSACTIONAL DISRUPTION

Venomline has preserved materials it characterizes as interference with existing or prospective business relationships, including direct or indirect contact with clients, disparaging claims, attempts to redirect trust away from Venomline, and efforts to damage platform account standing.

Interference Indicators Preserved

- Competitor-themed messages to or involving customers and prospects.
- References to Venomline sales, stud fees, customer trust, and future business harm.
- Statements intended to undermine Venomline's credibility in the American Bully community.
- Report-flow screenshots and threats to trigger platform restrictions.

Search / Domain Targeting Indicators

- Ahrefs screenshots preserving spam-labeled referring domains and sudden domain-growth patterns.
- Evidence of search visibility damage after a sharp mid-November 2024 Search Console drop.
- Preserved concerns about repurposed or networked sites amplifying adverse narratives.
- Disavow-related communications confirming toxic links were found and disavowed using Search Console.

Evidence Image Slot - Toxic Link Disavow Communication

Upload to Shopify Files and replace with CDN URL for: `IMG_8362_Original(1).jpeg`

Caption: Support communication stating toxic links were found using SEMrush and disavowed using Search Console.

Evidence Image Slot - Client / Breeder Message

Upload to Shopify Files and replace with CDN URL for: `IMG_8500(2).JPEG`

Caption: Preserved message exhibit referencing Venomline breeding relationships and disparaging Venomline's production credibility.

SECTION X

VERBATIM REPLICATION, STRUCTURAL MIRRORING & FINGERPRINT EVIDENCE

Venomline treats copying, paraphrase replication, structural mirroring, metadata reuse, and derivative text spinning as enforceable IP issues where the same topic sequence, unusual phrasing, typos, alt-tags, and page scaffolding appear after Venomline's earlier publication history.

FORENSIC INDICATOR	WHY IT MATTERS	PRESERVED REVIEW POINT
Exact phrase continuity	Unique text carried from earlier Venomline / TSB materials to later third-party pages can show copying beyond common industry language.	Stud-service and health-guarantee wording; veterinary-process language.
Structural redline match	Same order, headings, section logic, and page flow can indicate copying even if words are changed.	Reported 94% structural match in preserved redline materials.

FORENSIC INDICATOR	WHY IT MATTERS	PRESERVED REVIEW POINT
Typographical fingerprints	Unusual spelling errors are strong signals when replicated.	Preserved anomaly: "Bordetilla" and other matching typos.
Alt-tag / source-code residue	Metadata and image labels can preserve author identity or copy-source residue.	Forensic packet references copied source-code and alt-tag indicators.
Purge / de-index after enforcement	Removal after notice can corroborate that challenged assets had enforcement significance.	Purged assets and de-indexed URLs listed below.

SECTION XI

PURGED ASSETS, DE-INDEXED ASSETS & ENFORCEMENT OUTCOMES

Venomline preserves the following enforcement outcomes as part of its legal-review record. Removal or de-indexing does not itself adjudicate liability, but it is relevant to enforcement history, platform response, and evidentiary preservation.

43

PURGED ASSETS LOGGED

Previously documented SEBK assets removed from public locations.

32

DE-INDEXED URLS

Verified as Not In Index in preserved records.

15+

PAGES SCRUBBED

Preserved overhaul / concealment concern.

42+

REPLICATIONS ALLEGED

Preserved in recent appeal and escalation materials.

ASSET / URL PATTERN	STATUS	FORENSIC BASIS	REVIEW NOTE
/breeding-pairs/	**Purged**	Metadata / content match	Preserved in prior enforcement log.
/bully-studs/	**Purged**	Metadata / content match	Preserved in prior enforcement log.
/pocket-bully-for-sale/	**Purged**	Content-theft allegation	Preserved in forensic log.
/micro-bully-for-sale/	**Purged**	Content-theft allegation	Preserved in forensic log.
/health-guarantee/	**Not In Index**	Search removal / index status	Preserved as verified de-index evidence.
/understanding-the-unique-temperament...	**Not In Index**	Search removal / index status	Preserved as verified de-index evidence.
/blog/	**Not In Index**	Search removal / index status	Preserved as verified de-index evidence.

SECTION XII

URGENT REQUEST TO PLATFORM TRUST & SAFETY TEAMS

Venomline requests manual high-priority review by Meta/Facebook, Google Search Quality, Google Business Profile Trust & Safety, Pinterest, Medium, hosting providers, search engines, and other relevant platforms. Automated review is insufficient where the same reporting party or linked entities are alleged to have engaged in repeat bad-faith reporting.

Requested Actions

- Manual review of enforcement actions tied to the reporting party.
- Restoration of content or account features removed due to false or unsupported reports.
- Investigation into repeat abuse of reporting tools and claimant history.
- Safeguards preventing new automated removals initiated by the same party or related entities.
- Preservation of all DMCA notices, metadata, IP logs, account IDs, report timestamps, review logs, moderation notes, and appeal outcomes.

Platform-Specific Requests

- **Meta:** review page-at-risk status, monetization loss, account restrictions, and mass-report behavior.
- **Google Search:** review Search Console drop, toxic link history, disavow records, de-indexing, and suspicious reporting windows.
- **Google Business Profile:** review PO box / USPS address issue, review velocity, account linkage, and fake engagement indicators.
- **Pinterest / Medium / Hosts:** review repeat copyright notices and re-reporting after prior resolution.

Notice of preservation: After publication and delivery of this record, deletion of report logs, claimant metadata, moderation notes, review clusters, IP-linkage data, or account-linkage evidence may create a spoliation issue in later legal review.

SECTION XIII

CLAIMED LEGAL AND POLICY VIOLATIONS REQUIRING REVIEW

The preserved conduct, if verified through source records and platform logs, may implicate the following categories. Final legal conclusions are reserved for counsel, platform adjudication, or a court.

- **DMCA abuse / material misrepresentation:** repeated notices asserted against content Venomline identifies as earlier-published and original.
- **Platform manipulation / bad-faith reporting:** mass or coordinated reports used to obtain competitive advantage or suppress business assets.
- **Google Business Profile fake engagement:** review-velocity anomalies, low-trust reviewer accounts, and alleged review padding.
- **Deceptive business representation:** alleged use of a USPS / PO box-style location for a business profile requiring legitimate address review.
- **Harassment and targeted attacks:** anonymous texts, report threats, public reputation attacks, and emotional-distress-related statements preserved for review.
- **Tortious interference / business sabotage:** customer-relationship interference, account-standing damage, revenue harm, and platform restriction attempts.
- **Search manipulation / toxic-link activity:** suspicious backlink growth, spam-domain patterns, and disavow-related evidence requiring search-quality review.
- **Copyright infringement / derivative copying:** verbatim text, structural similarity, source-code residue, typo fingerprints, and mirrored page flow.
- **Privacy / likeness misuse:** alleged unauthorized scraping and republication of private or personal imagery in an adversarial commercial context.

SECTION XIV

PRESERVATION DIRECTIVES

Preserve Immediately

- Raw screenshots, original files, EXIF data, filenames, upload dates, and device metadata.
- Google Search Console exports, analytics logs, Search Console property history, disavow files, toxic-link exports, and server logs.
- All DMCA notices, counter-notices, platform warnings, ticket IDs, appeal records, and support chats.
- Review screenshots, reviewer URLs, review timestamps, public

Escalation Targets

- Outside counsel and litigation-support vendor.
- Meta Legal / Trust & Safety.
- Google Search Quality and Google Business Profile Trust & Safety.
- Hosting providers and registrar abuse teams.
- Medium, Pinterest, YouTube, Reddit, and other publishing platforms where re-reporting occurred.

profile metadata, and Google Business Profile listing history.

- Meta professional dashboard screenshots, monetization records, page-status history, restriction notices, and support-ticket logs.
- Text-message screenshots, call logs, phone numbers, timestamps, and carrier / VOIP metadata where legally obtainable.
- Wayback captures, cached pages, source code, alt-tags, image file names, copied headings, and redline comparison files.
- Federal docket records, trademark records, and court rulings used as litigation context.

- Search-engine de-indexing and copyright review teams.
- Review-platform integrity teams.
- Civil court discovery if voluntary platform review is not sufficient.

SECTION XV

SWORN DECLARATION

"I, Matt Siebenthal, declare under penalty of perjury that I am the owner and authorized custodian of the protected assets identified in this record. I assert that the screenshots, archived materials, publication records, and forensic evidence described herein are preserved in good faith as part of Venomline's chain-of-custody file and legal-review record."

Signed: /s/ Matt Siebenthal
Date: July 6, 2026
Owner / Founder, Venomline Bullies and Texas Size Bullies

SECTION XVI

GOVERNANCE, POLICY & SOURCE REFERENCES

Venomline Copyright Protection Policy
Primary ownership and IP preservation page.

Venomline Forensic Audit Records
Supporting case record index and asset history.

SEBK Investigation Overview
Public-facing investigation summary.

Google Business Profile Policy Overview
Official Google policy: PO box addresses are not permitted.

Google Business Representation Guidelines
Official business identity and address accuracy guidance.

Oxendine v. Blockline Bullies - Docket
Federal docket context for trademark-overreach review.

APPENDIX

IMAGE UPLOAD MANIFEST FOR SHOPIFY FILES

EVIDENCE CATEGORY	LOCAL FILENAME(S)	RECOMMENDED PUBLIC CAPTION
Search Console traffic drop	IMG_8196_Original(2).JPG IMG_8506_Original(1).PNG	Search Console captures preserving mid-November 2024 visibility drop.
Ahrefs / backlink spam	Screenshot 2026-07-05 at 1.42.14 PM.png Screenshot 2026-07-05 at 1.42.53 PM(1).png Screenshot 2026-07-05 at 1.43.19	Ahrefs snapshots preserving backlink-spam and referring-domain surge indicators.

EVIDENCE CATEGORY	LOCAL FILENAME(S)	RECOMMENDED PUBLIC CAPTION
	PM(1).png Screenshot 2026-07-05 at 1.43.38 PM(1).png	
Google Business Profile reviews	IMG_0051 2(1).jpg IMG_0287(1).jpg	Google listing review-status before/after evidence.
Waxhaw / USPS address	Screenshot 2026-03-26 at 1.35.28 PM 2(1).png Screenshot 2026-03-26 at 1.36.38 PM 2(1).png	Maps and Street View evidence for address-eligibility review.
Meta page at risk	IMG_1352_Original(2).jpeg IMG_1353_Original(2).PNG	Meta professional dashboard page-at-risk and support-ticket evidence.
Report threat / text messages	CMBJE2292(2).JPG IMG_5154_Original(1).JPG IMG_5155_Original(1).JPG IMG_5305_Original(2).PNG	Preserved communications showing threats, report abuse, and reputational targeting; redact identifiers for public version.
Negative review attacks	GZWRE5864(2).JPG IMG_5072_Original(1).JPG	Review screenshots preserving similar defamatory narrative patterns and low-history profiles.

EVIDENCE CATEGORY	LOCAL FILENAME(S)	RECOMMENDED PUBLIC CAPTION
Forensic matrix and court graphics	Southeast_bully_kennels_content_theft_allegations_forensic_evidence(2).png Southeast_Bully_Kennels_Fraud_Exposed_Bad_Breeders_2026(1).jpg	Visual summary exhibits; use alongside text and public docket links.
Private image / unauthorized likeness	Original_Photograph-Venomline-Pocket-Bullies(1).jpg Screenshot 2026-03-03 at 9.25.05 AM.png Screenshot 2026-03-03 at 9.25.19 AM(1).png	Original image and alleged unauthorized use context; redact private identifiers as needed.
WordPress / Medium / page status evidence	IMG_9991.jpg IMG_5071_Original(1).JPG Screenshot 2026-03-22 at 8.08.03 PM(1).png	Publishing and page-status context preserving authorship and platform escalation history.

REQUEST LEGAL EVIDENCE PACKET

OPEN CURRENT IP POLICY

Custodian Notice: This record is preserved for legal discovery, platform review, search-quality review, business-listing integrity review, and enforcement follow-

up. Public-page language is written to distinguish verified public records from platform-verifiable allegations requiring internal logs.

VENOMLINE POCKET BULLIES

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JS 44 (Rev. 04/21) FLSD Revised 12/02/2022

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)* **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

I. (a) PLAINTIFFS

James Oxendine and Southeast Bully Kennels, L

DEFENDANTS

MATTHEW SIEBENTHAL, individually; MAT

(b) County of Residence of First Listed Plaintiff Lancaster Co., South Carolina
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Palm Beach Co. Florida
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys *(Firm Name, Address, and Telephone Number)*

The Lomnitzer Law Firm, P.A.; 7999 N Federal Hwy, Suite 202, Boca

Attorneys *(If Known)*

(d) Check County Where Action Arose: ☐ MIAMI- DADE ☐ MONROE ☐ BROWARD ☐ PALM BEACH ☐ MARTIN ☐ ST. LUCIE ☐ INDIAN RIVER ☐ OKEECHOBEE ☐ HIGHLANDS

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ☐ 1 U.S. Government Plaintiff
- ■ 3 Federal Question *(U.S. Government Not a Party)*
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff) and One Box for Defendant)*

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
☐ Citizen of This State	☐ 1	■ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
☐ Citizen of Another State	■ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

Click here for: Nature of Suit Code Descriptions

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excl. Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Med. Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Acts
- ☐ 720 Labor/Mgmt. Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

INTELLECTUAL PROPERTY RIGHTS
- ■ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent – Abbreviated New Drug Application
- ☐ 840 Trademark
- ☐ 880 Defend Trade Secrets Act of 2016

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit (15 USC 1681 or 1692)
- ☐ 485 Telephone Consumer Protection Act (TCPA)
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☐ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee – Conditions of Confinement

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

V. ORIGIN *(Place an "X" in One Box Only)*

■ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Re-filed **(See VI below)** ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district *(specify)* ☐ 6 Multidistrict Litigation Transfer ☐ 7 Appeal to District Judge from Magistrate Judgment ☐ 8 Multidistrict Litigation – Direct File ☐ 9 Remanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S) (See instructions): a) Re-filed Case ☐YES ☐NO b) Related Cases ☐YES ■ NO

JUDGE: **DOCKET NUMBER:**

VII. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause ***(Do not cite jurisdictional statutes unless diversity)***:
17 U.S.C. §512(f) - Misrepresentation under the DMCA; defamation; tortious interference, all stemming from a public

LENGTH OF TRIAL via days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: ☐ CHECK IF THIS IS A **CLASS ACTION** UNDER F.R.C.P. 23

DEMAND $ 250000

CHECK YES only if demanded in complaint:

JURY DEMAND: ■ Yes ☐ No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

DATE 07/24/2026

SIGNATURE OF ATTORNEY OF RECORD Kelly Ann M. DesRosiers

FOR OFFICE USE ONLY : RECEIPT # **AMOUNT** IFP JUDGE MAG JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) **Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) **County of Residence**. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) **Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked. Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: Nature of Suit Code Descriptions.

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

VI. Related/Refiled Cases. This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

VII. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity**. Example: U.S. Civil Statute: 47 USC 553
Brief Description: Unauthorized reception of cable service

VIII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

Date and Attorney Signature. Date and sign the civil cover sheet.