

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Michael Linfield

1 HARMEET K. DHILLON (CA SBN: 207873)

[harmeet@dhillonlaw.com](mailto:harmeet@dhillonlaw.com)

2 MATTHEW M. HOESLY (CA SBN: 289593)

[mhoesly@dhillonlaw.com](mailto:mhoesly@dhillonlaw.com)

3 **DHILLON LAW GROUP INC.**

4 177 Post Street, Suite 700

San Francisco, CA 94108

5 T: (415) 433-1700

6 MATTHEW S. SARELSON (*pro hac vice* forthcoming)

msarelson@dhillonlaw.com

7 **DHILLON LAW GROUP INC**

8 2100 Ponce de Leon, Suite 1290

Coral Gables, FL 33134

9 *Attorneys for Plaintiffs,*

10 SAWYER S., a minor by and through his guardian ad litem, Angela Sharbino,  
11 DONLAD D., a minor by and through his guardian ad litem, Yvonne Dougher,  
12 AYDEN M., a minor by and through his guardian ad litem, Maria Mekus,  
13 CONNOR C., a minor by and through his guardian ad litem, Amber Cain,  
14 HAYDEN H., a minor by and through his guardian ad litem, Carla Haas,  
15 WALKER B., a minor by and through his guardian ad litem, Jennifer Bryant,  
16 SOPHIA F., a minor by and through her guardian ad litem, Heather Trimmer,  
17 CORINNE D., a minor by and through her guardian ad litem, Stephenie Areeco,  
18 SYMONNE H., a minor by and through her guardian ad litem, Tania Harrison,  
19 and CLAIRE E. and REESE E., minors by and through their guardian ad litem,  
20 Ashley Anne-Rock Smith

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **COUNTY OF LOS ANGELES—STANLEY MOSK COURTHOUSE**

19 SAWYER S., a minor by and through his guardian  
20 ad litem, Angela Sharbino, DONLAD D., a minor  
21 by and through his guardian ad litem, Yvonne  
22 Dougher, AYDEN M., a minor by and through his  
23 guardian ad litem, Maria Mekus, CONNOR C., a  
24 minor by and through his guardian ad litem, Amber  
25 Cain, HAYDEN H., a minor by and through his  
26 guardian ad litem, Carla Haas, WALKER B., a  
27 minor by and through his guardian ad litem,  
28 Jennifer Bryant, SOPHIA F., a minor by and  
through her guardian ad litem, Heather Trimmer,  
CORINNE D., a minor by and through her  
guardian ad litem, Stephenie Areeco, SYMONNE  
H., a minor by and through her guardian ad litem,  
Tania Harrison, and

**CASE NO.: 22STCV01351**

**COMPLAINT FOR DAMAGES FOR:**

1. **VIOLATION OF CALIFORNIA CIVIL CODE § 3344**
2. **VIOLATION OF COMMON LAW RIGHT OF PUBLICITY**
3. **UNJUST ENRICHMENT**
4. **INTENTIONAL INTERFERENCE WITH CONTRACTUAL RELATIONS**
5. **INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE**
6. **CIVIL CONSPIRACY**
7. **SEXUAL BATTERY**

1 CLAIRES E. and REESE E., minors by and through  
their guardian ad litem, Ashley Anne-Rock Smith;

2 Plaintiffs,

3 vs.

4 TIFFANY ROCKELLE SMITH, an individual;  
5 HUNTER HILL, an individual; PIPER  
ROCKELLE INC., a California Corporation; and  
6 DOES 1-25, inclusive;

7 Defendants.  
8

**8. BATTERY**  
**9. INTENTIONAL INFLICTION OF**  
**EMOTIONAL DISTRESS**  
**10. VIOLATION OF CAL. BUS. & PROF.**  
**CODE §§ 17200, ET SEQ.**

**JURY TRIAL DEMANDED**

9  
10 Plaintiffs Sawyer S. (“Sawyer”), a minor by and through his guardian ad litem, Angela  
11 Sharbino, Donlad D. (“Donlad”), a minor by and through his guardian ad litem, Yvonne Dougher,  
12 Ayden M. (“Ayden”), a minor by and through his guardian ad litem, Maria Mekus, Connor C.  
13 (“Connor”), a minor by and through his guardian ad litem, Amber Cain, Hayden H. (“Hayden”), a  
14 minor by and through his guardian ad litem, Carla Haas, Walker B. (“Walker”), a minor by and through  
15 his guardian ad litem, Jennifer Bryant, Sophia F. (“Sophia”), a minor by and through her guardian ad  
16 litem, Heather Trimmer, Corinne D. (“Corinne”), a minor by and through her guardian ad litem,  
17 Stephenie Arecco, Symonne H. (“Symonne”), a minor by and through her guardian ad litem, Tania  
18 Harrison, and Claire E. (“Claire”) and Reese E. (“Reese”), minors by and through their guardian ad  
19 litem, Ashley Anne-Rock Smith (hereafter collectively referred to as “Plaintiffs”), by and through their  
20 attorneys of record, hereby complain and allege against defendants Tiffany Rockelle Smith (“Ms.  
21 Smith”), Hunter Hill (“Mr. Hill”), Piper Rockelle Inc. (“PRI”) and DOES 1 through 25, inclusive,  
22 (collectively hereafter referred to as “Defendants”) as follows:

23 **INTRODUCTION**

24 1. This matter involves a group of extremely bright, charismatic and talented pre-teens  
25 and teenagers who sought to share their collective passions and pursuits of various life interests and  
26 activities with the social media community on YouTube and other platforms. In doing so, Plaintiffs  
27 collaborated at various times with YouTube celebrity Piper Rockelle Smith (“Piper”) as members of  
28



1           4.       Plaintiff Donlad D. (“Donlad”), a 15-year old minor by and through his guardian ad  
2 litem, Yvonne Dougher, at all relevant times, is and was an individual residing in Los Angeles County,  
3 California. Donlad is a prolific YouTuber with nearly 600K subscribers on his YouTube channel:  
4 [DONLAD - YouTube](#). Donlad is also a successful entrepreneur who founded an apparel company  
5 called FAT CAT: [FAT CAT by DONLAD – Fat Cat Apparel](#).

6           5.       Plaintiff Ayden M. (“Ayden”), a 16-year old minor by and through his guardian ad  
7 litem, Maria Mekus, at all relevant times, is and was an individual residing in Los Angeles County,  
8 California. Ayden is a successful actor, influencer and prolific YouTuber with over 1.5 million  
9 subscribers on his YouTube channel: [Ayden Mekus - YouTube](#).

10          6.       Plaintiff Connor C. (“Connor” aka “Mad Panda”), a 16-year old minor by and through  
11 his guardian ad litem, Amber Cain, at all relevant times, is and was an individual residing in Los  
12 Angeles County, California. Connor is a successful actor, YouTuber and Instagram star with over  
13 270K subscribers on his YouTube channel: [Connor Cain - YouTube](#).

14          7.       Plaintiff Hayden H. (“Hayden”), a 14-year old minor by and through his guardian ad  
15 litem, Carla Haas, at all relevant times, is and was an individual residing in Los Angeles County,  
16 California. Hayden is a successful singer, dancer, actor and YouTuber with over 500K subscribers on  
17 his YouTube channel: [Hayden Haas Vlogs - YouTube](#).

18          8.       Plaintiff Walker B. (“Walker”), a 15-year old minor by and through his guardian ad  
19 litem, Jennifer Bryant, at all relevant times, is and was an individual residing in Los Angeles County,  
20 California. Walker is a successful actor and YouTuber with over 900K subscribers on his YouTube  
21 channel: [Walker Bryant - YouTube](#).

22          9.       Plaintiff Sophia F. (“Sophie” aka “Sophie Fergie”), a 14-year old minor by and through  
23 her guardian ad litem, Heather Trimmer, at all relevant times, is and was an individual residing in Los  
24 Angeles County, California. Sophia is a successful actress and YouTuber with over 1.6M subscribers  
25 on her YouTube Channel: [Sophie Fergi - YouTube](#).

26          10.       Plaintiff Corinne D. (“Corinne” aka “Corinne Joy”), a 14-year old minor by and  
27 through her guardian ad litem, Stephenie Areeco, at all relevant times, is and was an individual residing  
28

1 in Los Angeles County, California. Corinne is an actress, dancer, singer and YouTuber with nearly  
2 100K subscribers on her YouTube channel: [Corinne Joy - YouTube](#).

3 11. Plaintiff Symonne H. (“Symonne”), a 15-year old minor by and through her guardian  
4 ad litem, Tania Harrison, at all relevant times, is and was an individual residing in Los Angeles County,  
5 California. Symonne is a successful actress, social influencer and YouTuber with over 1.1M  
6 subscribers on her YouTube channel: [Symonne Harrison - YouTube](#).

7 12. Plaintiffs (and sisters) Claire E. (“Claire” aka “Claire RockSmith”) and Reese E.  
8 (“Reese”), 13-year old and 10-year old minors, respectively, by and through their guardian ad litem,  
9 Ashley Anne-Rock Smith, at all relevant times, are and were individuals residing in Clark County,  
10 Nevada. Claire is a successful actress, social media influencer, content creator and YouTuber with  
11 nearly 900K subscribers on her YouTube channel: [Claire RockSmith - YouTube](#). Claire’s younger  
12 sister, Reese, frequently participates in her older sister’s YouTube videos, but has never had her own  
13 YouTube channel.

14 13. Defendant Tiffany Rockelle Smith (“Ms. Smith”), at all relevant times, is and was an  
15 individual residing in Los Angeles County, California. Ms. Smith is the 40-year old mother, producer  
16 and director for her daughter—Piper Rockelle Smith (“Piper”)—who is a dancer, singer, actress,  
17 model and successful YouTuber and centerpiece of the “Squad” with over 8.5M subscribers on her  
18 YouTube channel: [Piper Rockelle - YouTube](#). Ms. Smith is the CEO and Director of defendant talent  
19 holdings company Piper Rockelle Inc. (“PRI”).

20 14. Defendant Hunter Hill (“Mr. Hill”), at all relevant times, is and was an individual  
21 residing in Los Angeles County, California. Mr. Hill, who is frequently and erroneously referred to as  
22 Piper Rockelle Smith’s “brother”, is actually the 25-year old live-in boyfriend of defendant Ms. Smith  
23 and the primary director, editor and cinematographer of Piper Rockelle’s content for her wildly  
24 successful YouTube channel.

25 15. Defendant Piper Rockelle Inc. (“PRI”), at all relevant times, is and was a California  
26 Corporation and talent holdings company licensed and registered to do business in the State of  
27 California and County of Los Angeles bearing entity number C4239687. PRI’s principal place of  
28

1 business is in Los Angeles, California. PRI is solely owned and operated by defendant Ms. Smith. On  
2 information and belief, Plaintiffs aver that as the talent holdings company for Piper, Defendant PRI  
3 receives the payments from YouTube (Google) and other sources derived from the ad revenue  
4 generated on her YouTube channel.

5 16. Plaintiffs are ignorant of the true names and capacities of defendants sued herein as  
6 DOES 1 through 25, inclusive, and therefore sues these defendants by such fictitious names. Plaintiffs  
7 will amend this Complaint to allege their true names and capacities when ascertained. Plaintiffs are  
8 informed and believe and thereon allege that each of these fictitiously named defendants is responsible  
9 in some manner for the occurrences herein alleged, and that Plaintiffs' resultant injuries and damages  
10 were solely and proximately caused by the acts/errors/omissions of Defendants, and each of them.

11 17. All Defendants were responsible for the events and damages alleged herein, including  
12 on the following bases: (a) Defendants committed the acts alleged; (b) at all relevant times, there  
13 existed a unity of ownership and interest between or among two or more defendants such that any  
14 individuality and separateness between or among two or more defendants has ceased and Defendants  
15 are the alter egos of one another. Defendants exercised domination and control over one another to  
16 such an extent that any individuality or separateness of defendants does not, and at all times herein  
17 mentioned, did not exist. Thus, adherence to the fiction of the separate existence of Defendants would  
18 permit abuse of the corporate privilege and would sanction fraud and promote injustice.

### 19 **JURISDICTION AND VENUE**

20 18. Venue is proper in this Court, as the conduct giving rise to this lawsuit occurred in Los  
21 Angeles County, California.

22 19. The California Superior Court has jurisdiction over this action pursuant to California  
23 Constitution Article VI, section 10, which grants the Superior Court "original jurisdiction in all cases  
24 except those given by statute to other trial courts."

25 20. Plaintiffs are informed and believe, and thereon allege, that this Court is the proper  
26 venue for trial because any and all causes of action accrued here, Defendants are located and conduct  
27 business here, and witnesses are located here.



**YouTube channels revenue**

<b>Channels</b>	<b>2020 revenue</b>
#1 – Ryan’s World	\$29.5 million
#2 – Mr Beast	\$24 million
#3 – Dude Perfect	\$23 million
#4 – Rhett and Link	\$20 million
#5 – Markiplier	\$19.5 million
#6 – Preston	\$19 million
#7 – Like Nastya	\$18.5 million
#8 – Blippi	\$17 million
#9 – David Dobrik	\$15.5 million
#10 – Jeffery Star	\$15 million

Source: [YouTube Revenue and Usage Statistics \(2021\) - Business of Apps](#)

25. The prospect of “striking it rich” with YouTube content creation (and corresponding viewership) spawned an industry of individuals attempting to do just that. As a result, the advent of the “YouTube celebrity” has become a defining feature of YouTube’s populist platform since its inception—making internet stars of young and old alike.

26. Piper Rockelle is one such young YouTube star. A gifted young lady who now boasts a subscriber base of over 8.5M, Piper was just 9 years old when she became relatively “internet famous” almost overnight.

27. On November 29, 2016, Ms. Smith and Mr. Hill posted the first of now nearly 550 videos that have been uploaded to Piper’s YouTube channel. Piper’s first video, which was entitled “Piper Rockelle creates Fluffy Slime”, features an affable and enthusiastic pre-teen Piper



1 demonstrating how to create “slime” from four simple ingredients: [Piper Rockelle creates Fluffy Slime](#)  
2 [- YouTube](#). The video, which ran just over 3 minutes in length, was an instant success and ultimately  
3 garnered nearly 5 million views on Piper’s YouTube channel.

4 28. Based in large part on the success of Piper’s first posted video, Ms. Smith and Mr. Hill  
5 encouraged Piper to keep creating more and more content such as “DIY” videos, dance videos and  
6 “challenge” videos, which, over the past 5 years, has helped Piper to acquire a built-in audience of  
7 over 8.5M “subscribers” on her YouTube channel.

8 29. As viewership of and subscribers to Piper’s channel began to explode at the end of  
9 2016, she began branching out with the creation of additional unique content and ultimately sought to  
10 boost her viewership by collaborating with friends, family members and other up-and-coming  
11 YouTube child stars in creating other video content such as “challenge-based” video content. As a  
12 result, over a span of about 4 years from July 2017 through June 2021, Piper, through Ms. Smith and  
13 Mr. Hill, actively collaborated with and featured Plaintiffs in hundreds of Piper’s videos that were  
14 ultimately posted on the latter’s YouTube channel.

15 30. Throughout this period, Ms. Smith and Mr. Hill actively directed, produced and edited  
16 the video content that was posted on Piper’s YouTube channel, which necessarily included frequently  
17 interacting with Plaintiffs either on or off set. As to the frequent interactions between Ms. Smith and  
18 Plaintiffs, and besides developing a reputation as a “mean-spirited control freak” with them, many of  
19 Ms. Smith’s interactions with Plaintiffs were not only sexually inappropriate and confrontational, but  
20 often reprehensible and even illegal.

21 **Plaintiffs’ Contributions to Piper’s “Squad” and the Growth of Piper’s Channel**

22 31. From July 2017 through June 2021, Plaintiffs spent significant time, energy and  
23 expense collaborating with Ms. Smith and Mr. Hill in helping Piper to create content for her YouTube  
24 channel, without any compensation whatsoever provided by Defendants. Specifically, Plaintiffs  
25 collaborated with Ms. Smith, Mr. Hill and Piper during the following periods of time, and individually  
26 and collectively appeared in hundreds of videos posted on Piper’s YouTube channel as follows:

27 //

- 1 a. Plaintiff Sawyer S.: collaborated with Defendants and Piper from September 2018—March  
2 2019 and again from January 2020—February 2021; appeared in a total of 106 videos  
3 posted on Piper’s YouTube channel.
- 4 b. Plaintiff Donlad D.: collaborated with Defendants and Piper from July 2020—March 2021;  
5 appeared in a total of 18 videos posted on Piper’s YouTube channel.
- 6 c. Plaintiff Ayden M.: collaborated with Defendants and Piper from June 2020—June 2021;  
7 appeared in a total of 72 videos posted on Piper’s YouTube channel.
- 8 d. Plaintiff Connor C.: collaborated with Defendants and Piper from May 2019—August  
9 2019 and again from May 2020—June 2021; appeared in a total of 61 videos posted on  
10 Piper’s YouTube channel.
- 11 e. Plaintiff Hayden H.: collaborated with Defendants and Piper from April 2018—February  
12 2019 and again from September 2019—January 2021; appeared in a total of 81 videos  
13 posted on Piper’s YouTube channel.
- 14 f. Plaintiff Walker B.: collaborated with Defendants and Piper from June 2020—June 2021;  
15 appeared in a total of 72 videos posted on Piper’s YouTube channel.
- 16 g. Plaintiff Sophia F.: collaborated with Defendants and Piper from March 2018—September  
17 2020; appeared in a total of 186 videos posted on Piper’s channel.
- 18 h. Plaintiff Corinne D.: collaborated with Defendants and Piper from July 2017—February  
19 2019; appeared in a total of 16 videos posted on Piper’s YouTube channel.
- 20 i. Plaintiff Symonne H.: collaborated with Defendants and Piper from May 2019—August  
21 2019 and again from May 2020—June 2021; appeared in a total of 107 videos posted on  
22 Piper’s YouTube channel.
- 23 j. Plaintiff Claire E. (Piper’s cousin): collaborated with Defendants and Piper from February  
24 2020—June 2021; appeared in a total of 90 videos posted on Piper’s YouTube channel.
- 25 k. Plaintiff Reese E. (Piper’s cousin): collaborated with Defendants and Piper from February  
26 2020—June 2021; appeared in a total of 4 videos posted on Piper’s YouTube channel.

1           32. All told, Plaintiffs' contributions to Defendants (who have reaped millions of dollars  
2 as a direct result of Plaintiffs' involvement with Piper and her YouTube channel) collectively span  
3 thousands of hours of labor and nearly 800 collective appearances in Piper's 550 videos posted on her  
4 YouTube channel.

5           33. The average viewership on Piper's YouTube channel nearly quintupled from 2018 to  
6 2021 (when Plaintiffs began making appearances in Piper's videos) as opposed to the early years of  
7 Piper's YouTube channel from late 2016 to early 2018 (when only Plaintiff Corinne D. made a handful  
8 of appearances in Piper's videos).

9           34. While Plaintiffs were never compensated for the use of their names, images or  
10 likenesses in Piper's YouTube videos created and posted by Defendants, that was the least of their  
11 problems arising from Defendants' misconduct. As alleged in more detail below, Plaintiffs were  
12 frequently subjected to an emotionally, physically and sometimes sexually abusive environment  
13 perpetrated by Ms. Smith on and off set during filming sessions for Piper's YouTube channel.

14           **Ms. Smith's Grossly Inappropriate, Offensive and Abusive Treatment of Plaintiffs**

15           35. Throughout the course of Plaintiffs' relationship with Defendants, and specifically their  
16 relationship with Ms. Smith who functioned as the primary producer, director and overseer of the  
17 content creation for her daughter's YouTube channel, Ms. Smith oftentimes made wildly offensive  
18 and sexually explicit comments and innuendos to Plaintiffs. Several such instances include the  
19 following events:

- 20           a. During a filming session, Ms. Smith was referring to another "Squad" member when she  
21 told Sophia F. "I wonder since (this Squad member) has freckles, whether he has a bunch  
22 of freckles on his dick."  
23           b. Plaintiffs would frequently hear Ms. Smith refer to another Squad member's penis as  
24 "Dwayne the Rock Hard Johnson."  
25           c. Ms. Smith would frequently assume an alter-ego identity as "Lenny the Dead Cat" and  
26 chase Plaintiffs around her house (the usual filming site for Piper's videos) shouting  
27 obscene and sexually graphic phrases such as: (1) I'm going to f\*\*\* you up the ass; (2) I'm  
28

1 going to touch you in your sleep; (3) Yeah mama/little boy/little girl, let's make out, let's  
2 kiss.

3 d. Ms. Smith would also frequently assume an alter-ego identity as "Frank the Pug" and make  
4 similar sexually explicit and racially offensive remarks to Plaintiffs that she would make  
5 as "Lenny the Dead Cat."

6 e. Ms. Smith would frequently tell Plaintiffs who were typically "paired up" with one another  
7 as pseudo "crushes" for purposes of video content very sexually explicit instructions such  
8 as how to act with one another (i.e. forcefully grab her and aggressively kiss her), what to  
9 wear (i.e. sexually revealing clothing—short skirts and low cut tops for the girls and tight  
10 fitting jeans or sweatpants for the boys to show off their "bulges") and how to properly  
11 "date" and "crush" on each other.

12 f. Ms. Smith asking Plaintiff Hayden H. whether his "balls have dropped yet" and "how long  
13 is it [referring to his penis]?" Ms. Smith later remarked to Plaintiff Sophia F. that since  
14 Hayden H. had not gone through puberty yet, she wondered how "big" his penis was and  
15 whether his balls "dropped" yet.

16 g. Ms. Smith asking various Plaintiffs whether they have had sex before, including oral sex,  
17 and then encouraging Plaintiffs to try oral sex.

18 h. Ms. Smith telling Plaintiff Corinne D. (within earshot of other Plaintiffs), that Mr. Hill's  
19 penis was "small" and that she (Corinne D.) would "never want to have sex with him." Ms.  
20 Smith also frequently pushed, pulled, struck Corinne D., and yanked her hair while on and  
21 off set.

22 i. Ms. Smith frequently telling Plaintiff Sophia F. that she was sexually underdeveloped, that  
23 she "had no boobs" and that she "was so flat."

24 j. Ms. Smith locked Plaintiff Walker B. into a bathroom for a "discussion" and told him that  
25 he and another male Squad member were "horny bastards" for allegedly holding hands  
26 with two other female Squad members (which Walker B. never did). Ms. Smith would also  
27

1 pressure Walker B. to be more “sexually aggressive” and “physical” with her daughter,  
2 Piper, so the pair’s “crush” connection would appear more realistic in Piper’s videos.

3 k. During one period of time, Ms. Smith allowed a young adult to come onto the filming set  
4 and sexually harass the male Plaintiffs by touching their private parts and/or otherwise  
5 “backhanding” or “tapping” them on their penises.

6 l. During a thumbnail photo shoot for a YouTube video, Ms. Smith demanded that Plaintiff  
7 Sophia F. “take her clothes off” and ultimately made it appear that Sophia F. was fully  
8 “naked.” Ms. Smith also frequently told the male Plaintiffs to “take their shirts off” for  
9 photos and videos because “sex sells.”

10 m. For purposes of creating thumbnail photos for Piper’s YouTube videos, Ms. Smith would  
11 frequently tell Plaintiffs (including Piper) to make “sexy kissing faces” for thumbnails, to  
12 “push their butts out,” to “suck their stomachs in,” “wear something sluttier” and would  
13 otherwise position Plaintiffs’ bodies in explicitly and sexually suggestive positions. On  
14 another occasion, when Plaintiff Ayden M. asked Ms. Smith for a thumbnail for his  
15 YouTube channel, Ms. Smith told Ayden M. that she wanted to kill herself and that when  
16 she’s laying in a pool of her own blood, Ayden M. could post her dead body on Instagram.

17 n. Ms. Smith would often boast to Plaintiffs and others about being the “Madam of YouTube”  
18 and a “Pimp of YouTube” and that she “makes kiddie porn.”

19 o. Ms. Smith would discuss sex toys with Plaintiffs (such as Sophia F.) and ask whether she  
20 “knew what a dildo was for.”

21 p. On one occasion during an off-site shoot in Las Vegas, Ms. Smith offered hemp brownies  
22 to Plaintiffs who unwittingly consumed them. Ms. Smith also discussed and engaged in the  
23 use of recreational drugs around Plaintiffs and encouraged same.

24 q. On another occasion off-set, Ms. Smith asked Plaintiff Reese E. (the youngest Plaintiff) in  
25 Lenny the Dead Cat’s voice whether “she has ever had sex before.” When Reese responded  
26 “no,” Ms. Smith told her “well I think you should.” Ms. Smith would also ask Reese E., in  
27 Lenny’s voice, whether she “wanted to see my dick” and “smell my smelly dick.” On one  
28

1 occasion in particular, Ms. Smith sat on the bed next to Reese E. and began moving her  
2 hand up Reese's exposed leg toward her vagina when Reese E. recoiled and knocked her  
3 hand away. On several other occasions, Ms. Smith, in Lenny's voice, would grab a broom  
4 and rub the broom handle all over Reese E.'s face and head telling her it was "Lenny's big  
5 smelly penis." Finally, on yet another occasion, and after running into a bathroom to hide  
6 from Ms. Smith, Reese E. heard Ms. Smith outside the door tell her: "Reese, I have my  
7 pants down...do you want to come see?" When Reese finally left the bathroom, Ms. Smith  
8 ambushed her, grabbed her by the neck, tossed her onto the bed and began pretending that  
9 her right arm was "Lenny's penis" and rubbing it all over Reese's face, head and mouth.

10 r. Ms. Smith also inappropriately touched Plaintiff Claire E. on numerous occasions as well  
11 by rubbing her exposed thighs and moving her hand toward her vagina, constantly spanking  
12 and/or slapping her buttocks, sticking her finger / poking her anus over her clothing when  
13 she walked by Ms. Smith, commenting on how "big" Claire E.'s breasts looked and then  
14 attempting to squeeze them, and on one occasion, taking a wooden spoon and smacking it  
15 all over Claire E.'s body. Ms. Smith also tried to spit in Claire E.'s mouth and on her face  
16 one time when Ms. Smith was on top of her after Claire E. woke up in the morning.

17 s. On another occasion off-set, Plaintiff Corinne D. accompanied Ms. Smith to the local Post  
18 Office where Ms. Smith mailed out several of Piper's soiled training bras and panties to an  
19 unknown individual. Ms. Smith remarked to Corinne D. that "old men like to smell this  
20 stuff."

21 t. On another occasion on-set, Plaintiff Sophia F. witnessed Ms. Smith grab Piper's face and  
22 make-out with her in an attempt to teach her how to "kiss."

23 u. On another occasion off-set, Ms. Smith was at a local Taco Bell drive-thru with Connor  
24 C., Mr. Hill, Piper and another Squad member at the time when she was asked by the drive-  
25 thru operator whether she wanted "sauce" with her order, Ms. Smith responded by  
26 aggressively rubbing her breasts for everyone to see and loudly exclaiming "Yes Daddy,  
27 extra sauce please!"

- 1 v. Ms. Smith would oftentimes make numerous other sexually suggestive remarks to the male  
2 Plaintiffs and/or embarrass Mr. Hill in an attempt to make him “jealous” of her  
3 relationships with the male Plaintiffs.
- 4 w. Ms. Smith would frequently spank and/or otherwise slap several of Plaintiffs’ buttocks and  
5 also attempt to (and occasionally succeed in) “probing” and/or otherwise “sticking a  
6 finger” in Plaintiffs’ butts as they passed by her on or off set.
- 7 x. On another occasion, Ms. Smith accessed and showed Plaintiff Corinne D. the  
8 pornographic website “PornHub.”
- 9 y. On several other occasions, Ms. Smith would accuse several male Plaintiffs of  
10 “masturbating” on set.
- 11 z. On numerous occasions, Ms. Smith would verbally harass, yell and curse at Plaintiffs if  
12 she felt they were doing something wrong in the videos, which would oftentimes cause  
13 Plaintiffs to break down and cry either on set or after they got home to their families.

14 36. Unfortunately, and even after Plaintiffs eventually left the “Squad,” Ms. Smith’s abuse  
15 did not end there, as she and Mr. Hill actively sought to sabotage Plaintiffs by driving down viewers  
16 and subscribers on their individual YouTube channels.

17 **Ms. Smith and Mr. Hill Conspire to Sabotage Plaintiffs’ Respective YouTube Channels**  
18 **After Plaintiffs Leave “The Squad”**

19 37. On several occasions during and after their time in the “Squad,” Plaintiffs and/or their  
20 guardians, learned that Defendants were capable of, and in fact, had interfered with Plaintiffs’ and  
21 others YouTube channels by engaging in a variety of dirty tactics such as: using “bots,” paying to  
22 quickly add and then remove “subscribers” from a YouTube channel (which affects YouTube’s  
23 algorithm for recommended content), falsely flagging content as “inappropriate” on YouTube (which  
24 leads to the content being deemed “restricted,” thereby hurting viewership of the content), embedding  
25 Plaintiffs’ videos into porn sites and working with an inside individual named “Alex” at YouTube to  
26 help “restrict” Plaintiffs’ videos.

27 //





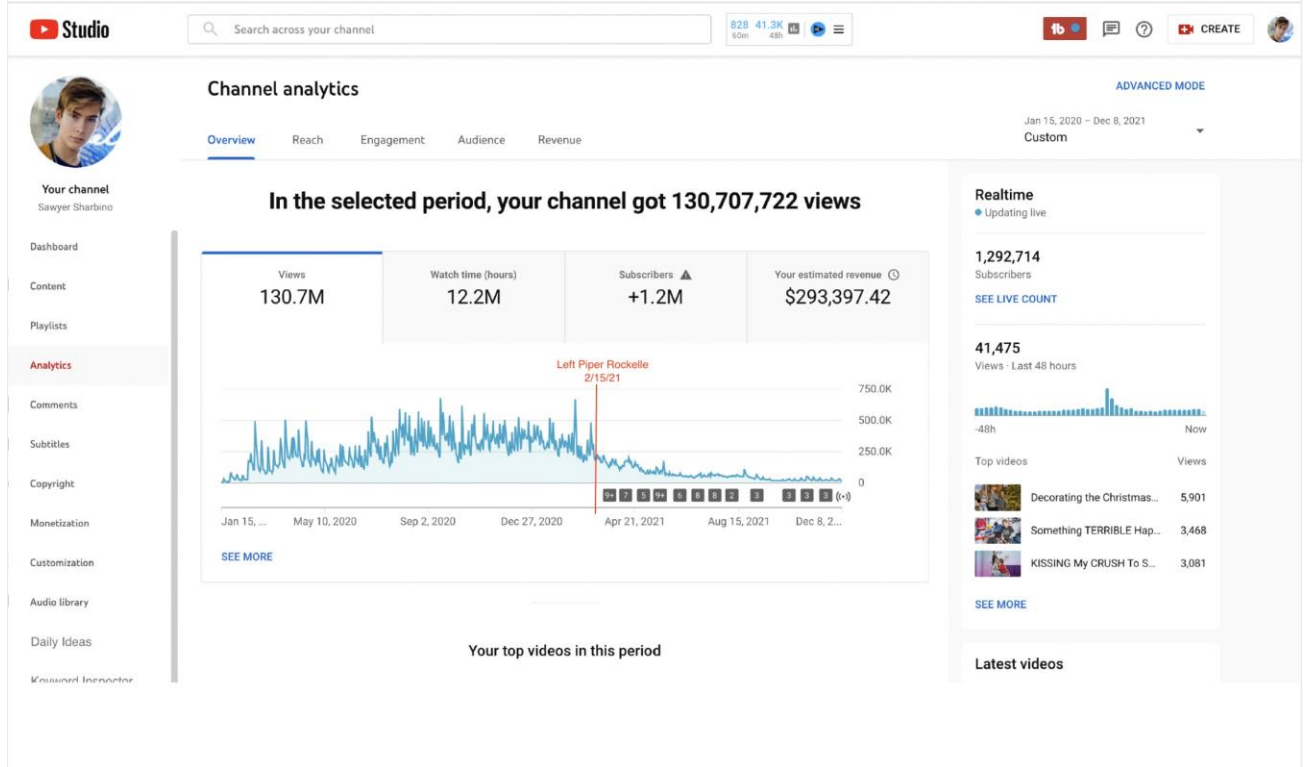
1           42. After suffering through Ms. Smith’s abuse as delineated above (all while  
2 uncompensated for their contributions to Piper’s YouTube channel), Plaintiffs all eventually left the  
3 “Squad” to either focus on building their own YouTube channels, collaborating with each other or  
4 other (non-abusive) individuals on video content, or exploring and honing other talents such as  
5 singing, dancing, social media influencing, entrepreneurship and acting.

6           43. When Plaintiffs eventually left the “Squad,” they immediately began to experience a  
7 significant decline in not only the number of “views” to the content that they created and uploaded to  
8 their respective YouTube channels, but also a decline in the number of “subscribers” to their respective  
9 YouTube channels. As a result, Plaintiffs suffered a drastic reduction in revenue from YouTube.  
10 Moreover, Plaintiffs’ visibility on YouTube was so negatively impacted that it interfered with their  
11 ability to effectively market themselves and secure potentially lucrative endorsements with various  
12 products and companies.

13           44. For example, the following charts taken from Plaintiff Sawyer S.’s respective  
14 “analytics” page on his YouTube channel demonstrates the drastic decline in his YouTube channel  
15 viewership, YouTube channel “subscribers” and YouTube channel revenue after leaving the “Squad”  
16 by depicting: (1) the number of Sawyer S.’s YouTube views from the time he joined the “Squad” to  
17 present; (2) the number of Sawyer S.’s YouTube “subscribers” from the time he joined the “Squad”  
18 to present; (3) Sawyer S.’s YouTube revenue from the time he joined the “Squad” to present; (4)  
19 Sawyer S.’s YouTube revenue from the time he joined the “Squad” to the time he left the “Squad”;  
20 (5) Sawyer S.’s YouTube revenue from the time he left the “Squad” to present; and (6) Sawyer S.’s  
21 YouTube monthly revenue from the time he joined the “Squad” to the present, with the time he left  
22 the “Squad” delineated.

23 //  
24 //  
25 //  
26 //  
27 //

1 Chart 1: The number of Sawyer S.'s YouTube views from the time he joined the "Squad" to present:



13

14

15 Chart 2: the number of Sawyer S.'s YouTube "subscribers" from the time he joined the "Squad" to present:

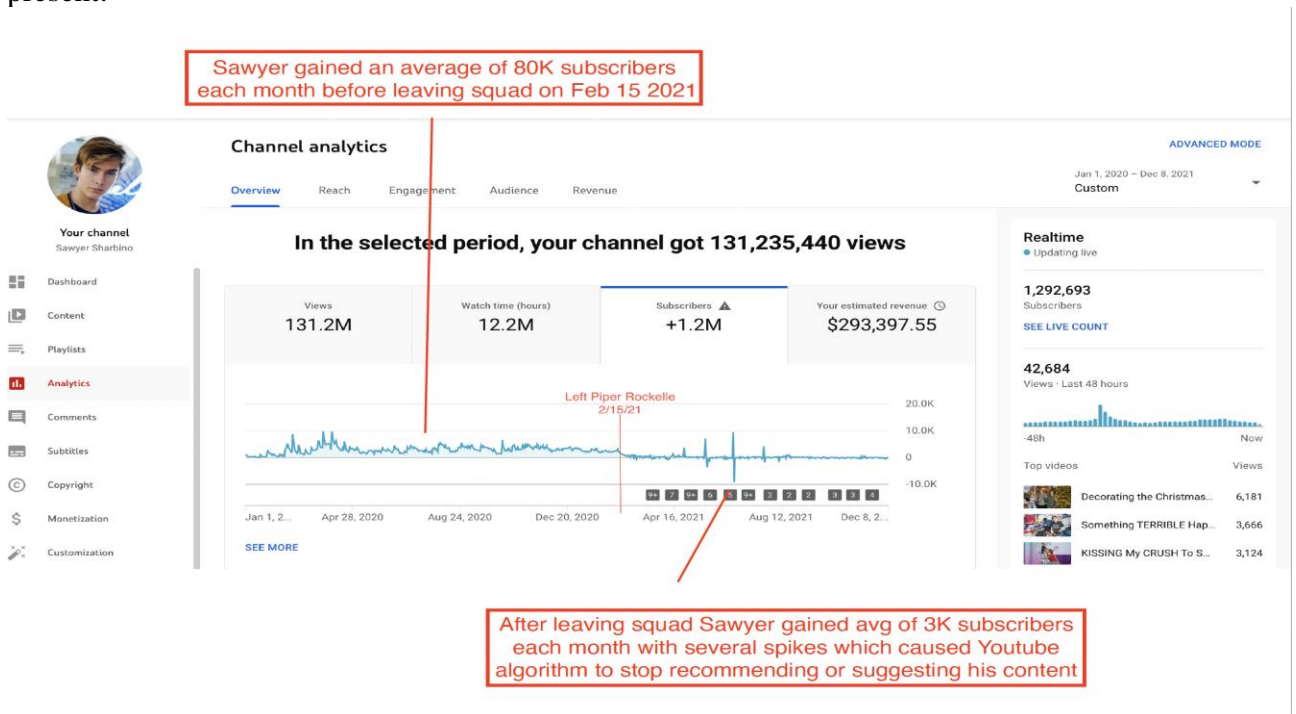


Chart 3: Sawyer S.'s YouTube revenue from the time he joined the "Squad" to present:

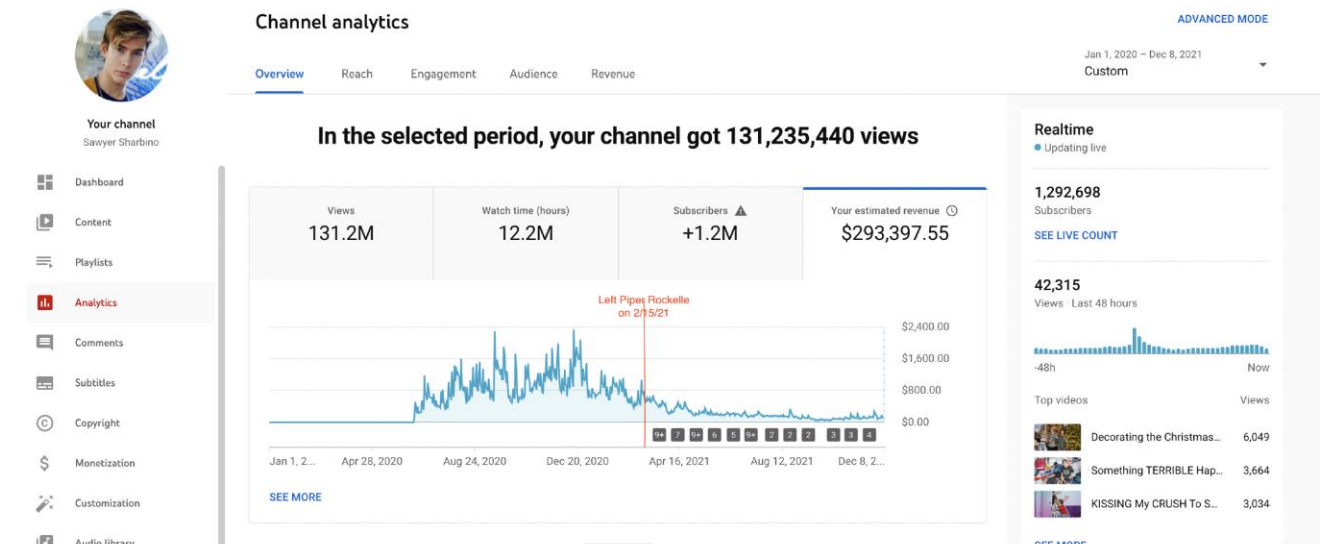


Chart 4: Sawyer S.'s YouTube revenue from the time he joined the "Squad" to the time he left the "Squad":

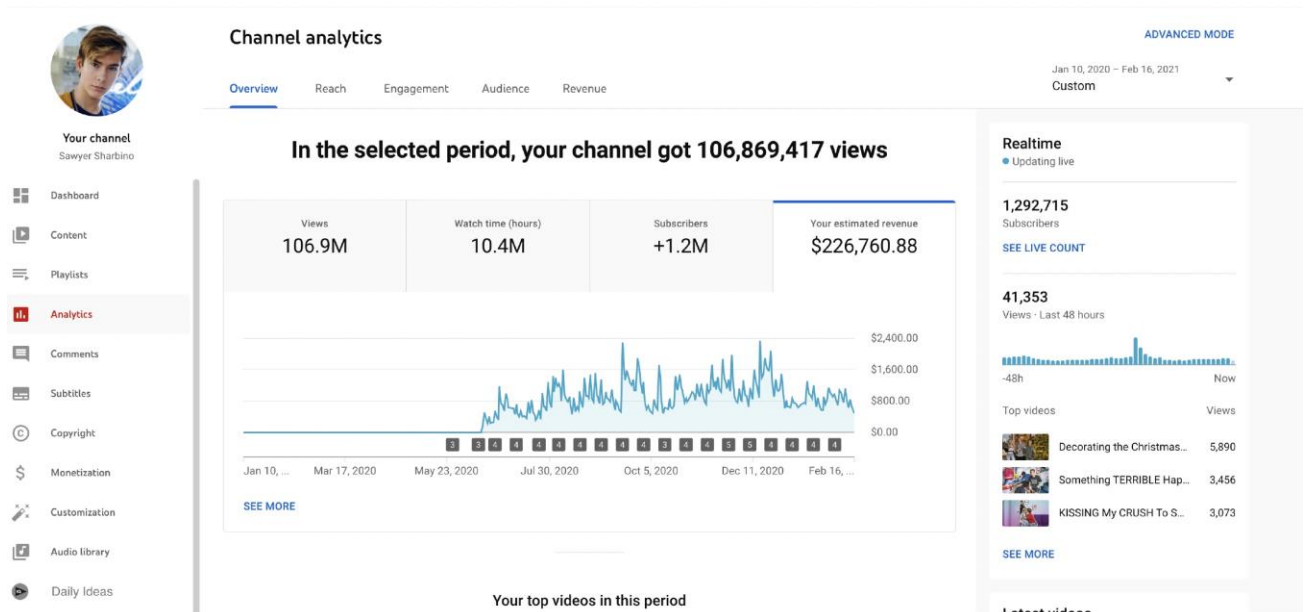


Chart 5: Sawyer S.'s YouTube revenue from the time he left the "Squad" to present:

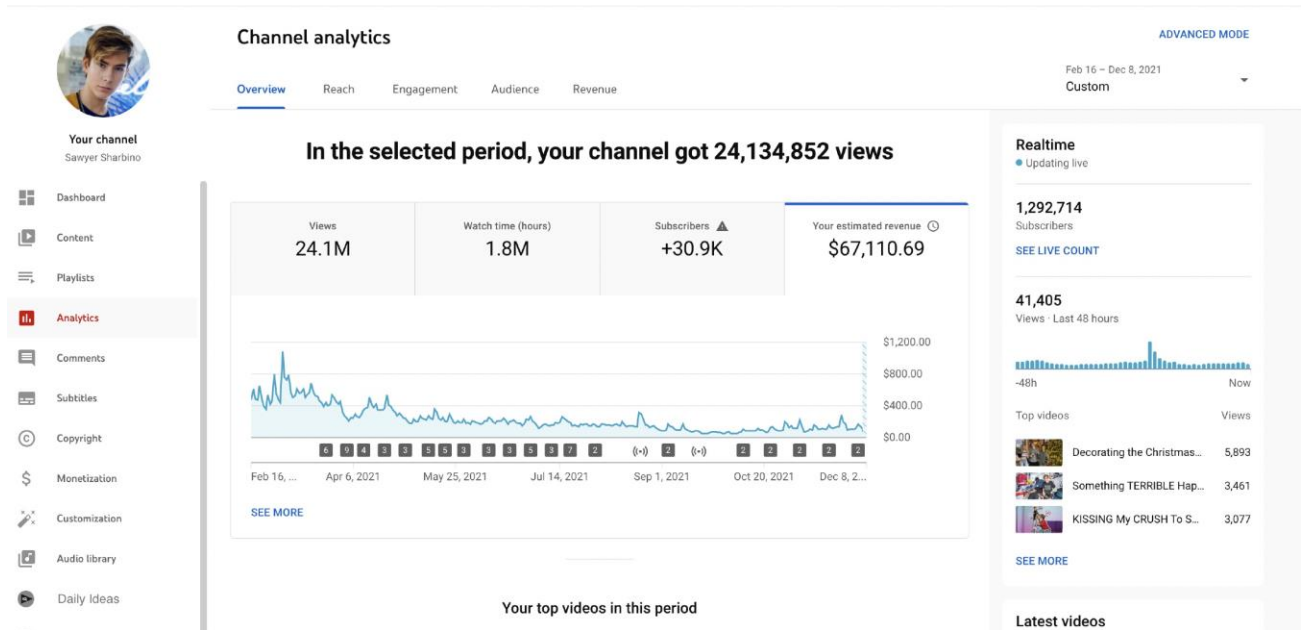
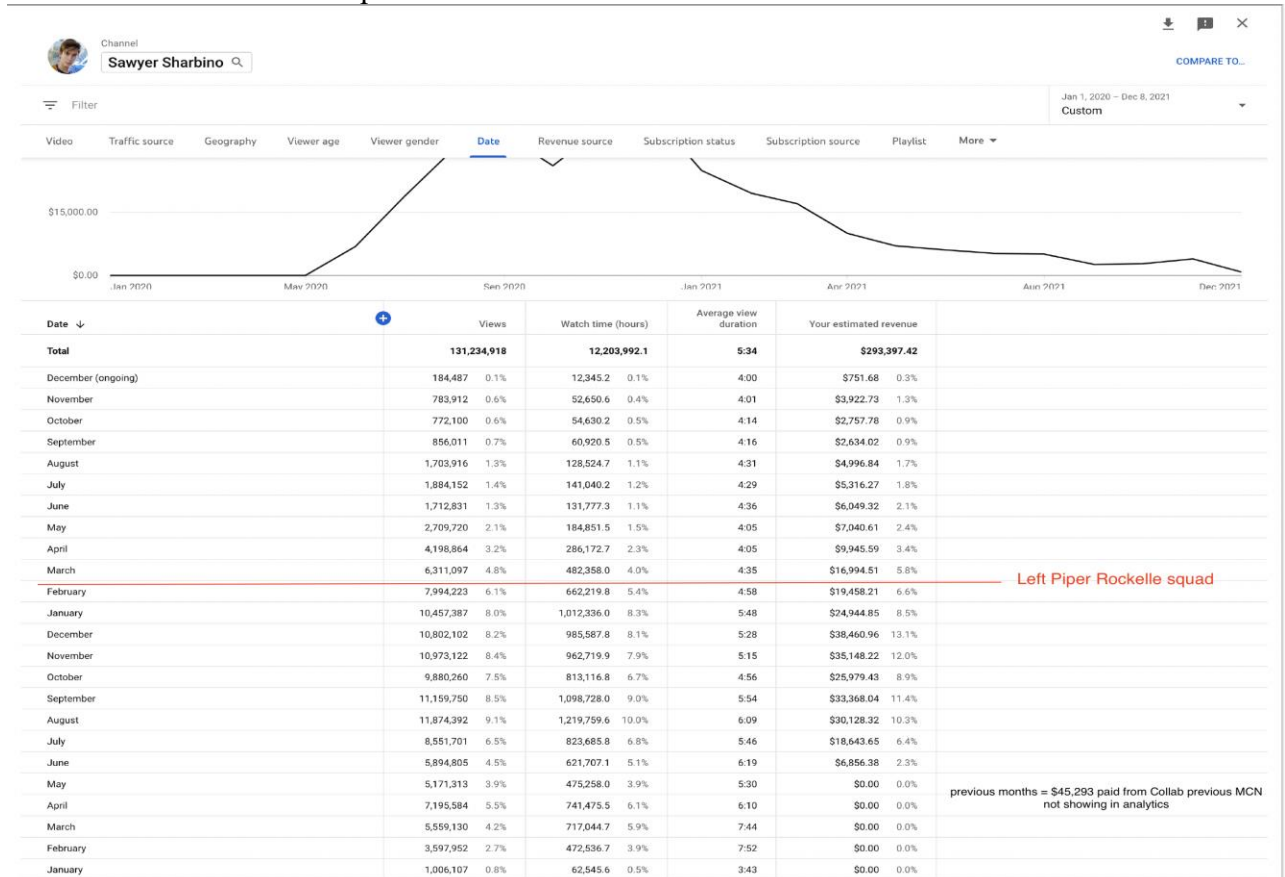


Chart 6: Sawyer S.'s YouTube monthly revenue from the time he joined the "Squad" to the present, with the time he left the "Squad" delineated:



1           45.     Charts 1 through 6, as set forth above and attached to this Complaint as Exhibits 1A –  
2 1F, clearly show that almost immediately after leaving the “Squad” in February 2021, Plaintiff Sawyer  
3 S. not only suffered from a drastic decline in viewership of the content posted to his YouTube channel,  
4 but also had the growth of his YouTube channel “subscriber” base effectively flatline. Coupled with  
5 a few manipulated “spikes” (which quickly added and removed “subscribers” to Sawyer S.’s YouTube  
6 channel, thereby effectively causing YouTube’s algorithm to stop recommending Sawyer S.’s  
7 YouTube channel), the massive loss in viewership and the overall stagnation of Sawyer S.’s  
8 “subscriber” base led to an enormous drop-off in revenue generation from YouTube as depicted in  
9 Charts 3 through 6.

10           46.     For example, while in the “Squad,” Plaintiff Sawyer S.’s YouTube revenue generation  
11 averaged nearly \$22,000.00 a month (including over \$45,000.00 during a 5-month period in which  
12 Sawyer S. was paid his YouTube revenue from another source that he was collaborating with at the  
13 time). By comparison, Plaintiff Sawyer S.’s YouTube revenue generation after leaving the “Squad”  
14 has averaged barely over \$6,000.00 a month (with the last 4 months averaging barely \$3,000.00 a  
15 month)—an incredible 366% decline in revenue from the time when he was in the “Squad.”

16           47.     Likewise, Plaintiffs Donlad D. (Exh. 2A - 2F), Ayden M. (Exh. 3A -3F), Connor C.  
17 (Exh. 4A - 4F), Hayden H. (Exh. 5A - 5F), Walker B. (Exh. 6A - 6F), Sophia F. (Exh. 7A - 7F),  
18 Symonne H. (Exh. 8A - 8F) and Claire E. (Exh. 9A - 9F) have all suffered similar declines to their  
19 YouTube channels’ viewership, “subscribers” and YouTube revenue as depicted in the respective  
20 charts taken from their YouTube channel “analytics” pages.

21           48.     As for Plaintiff Donlad D. (Exh. 2A - 2F), his YouTube revenue generation averaged  
22 nearly \$6,000.00 a month during the time that he was in the “Squad.” By comparison, his YouTube  
23 revenue generation after leaving the “Squad” has averaged barely over \$1,400.00 a month—a  
24 staggering 420% decline in revenue from the time when he was in the “Squad.”

25           49.     As for Plaintiff Ayden M. (Exh. 3A - 3F), his YouTube revenue generation averaged  
26 nearly \$24,000.00 a month during the time that he was in the “Squad” (including his first full month  
27 when he generated \$0). By comparison, his YouTube revenue generation after leaving the “Squad”  
28

1 has averaged just over \$14,000.00 a month (with the last 4 months averaging just over \$10,000.00 a  
2 month)—a nearly 100% decline in revenue from the time when he was in the “Squad.”

3 50. As for Plaintiff Connor C. (Exh. 4A - 4F), his YouTube revenue generation averaged  
4 nearly \$3,500.00 a month during the time that he was in the “Squad.” By comparison, his YouTube  
5 revenue generation after leaving the “Squad” has averaged just over \$666.00 a month—a staggering  
6 520% decline in revenue from the time when he was in the “Squad.”

7 51. As for Plaintiff Hayden H. (Exh. 5A - 5F), his YouTube revenue generation averaged  
8 nearly \$5,500.00 a month during the time that he was in the “Squad.” By comparison, his YouTube  
9 revenue generation after leaving the “Squad” has averaged just over \$900.00 a month (with the last 4  
10 months averaging barely \$250.00 month)—a staggering 600% decline in revenue from the time when  
11 he was in the “Squad.”

12 52. As for Plaintiff Walker B. (Exh. 6A - 6F), his YouTube revenue generation averaged  
13 nearly \$28,000.00 a month during the time that he was in the “Squad.” By comparison, his YouTube  
14 revenue generation after leaving the “Squad” has averaged just over \$4,800.00 a month (with the last  
15 4 months averaging just over \$1,800.00 a month)—a staggering 600% decline in revenue from the  
16 period when he was in the “Squad.”

17 53. As for Plaintiff Sophia F. (Exh. 7A - 7F), her YouTube revenue generation averaged  
18 nearly \$18,000.00 a month during the time that she was in the “Squad.” By comparison, her YouTube  
19 revenue generation after leaving the “Squad” has averaged just over \$6,700.00 a month (with the last  
20 4 months averaging just over \$1,200.00 a month)—a staggering 300% decline in revenue from the  
21 period when she was in the “Squad.”

22 54. As for Plaintiff Symonne H. (Exh. 8A - 8F), her YouTube revenue generation averaged  
23 nearly \$17,500.00 a month during the time that she was in the “Squad” (including her first full month  
24 when she only generated \$100.00). By comparison, her YouTube revenue generation after leaving the  
25 “Squad” has averaged just over \$12,000.00 a month (with the last 4 months averaging about \$7,000.00  
26 a month)—a significant 150% decline in revenue from the period when she was in the “Squad.”

27 //

28



1 which exceeds the jurisdictional minimum of this Court. When Plaintiffs Ayden M., Sophia F. and  
2 Claire E. have ascertained the full amount of their damages, they will seek leave of Court to amend  
3 this Complaint accordingly.

4 62. As a direct and proximate result of Defendants' alleged wrongful acts, Plaintiffs Ayden  
5 M., Sophia F. and Claire E. have incurred, and will continue to incur, substantial attorneys' fees and  
6 costs. Plaintiffs Ayden M., Sophia F. and Claire E. are entitled to an award of their attorneys' fees and  
7 costs incurred in connection with this action pursuant to Section 3344(a) of the California Civil Code.

8 63. By reason of Defendants' wrongful acts, in addition to the relief sought herein,  
9 Plaintiffs Ayden M., Sophia F. and Claire E. are entitled to an accounting of all of Defendants'  
10 revenues and profits associated with the unauthorized use of Plaintiffs Ayden M., Sophia F. and Claire  
11 E. names, identities and personas, and to an award of all such sums. By reason of Defendants' wrongful  
12 acts as alleged above, Defendants are involuntary trustees holding all such sums in their possession  
13 under a constructive trust for the benefit of Plaintiffs Ayden M., Sophia F. and Claire E. with a duty  
14 to transfer the same to them.

15 64. Plaintiffs Ayden M., Sophia F. and Claire E. are informed and believe, and based  
16 thereon allege, that Defendants, in doing the things herein alleged, acted maliciously, oppressively and  
17 fraudulently, and with full knowledge of the adverse effect of their actions on Plaintiffs with willful  
18 and deliberate disregard for the consequences to Plaintiffs Ayden M., Sophia F. and Claire E. By  
19 reason thereof, Plaintiffs Ayden M., Sophia F. and Claire E. are entitled to recover punitive and  
20 exemplary damages from Defendants in an amount to be determined at trial.

21 **SECOND CAUSE OF ACTION**

22 **VIOLATION OF COMMON LAW RIGHT OF PUBLICITY**

23 **(By Plaintiffs Ayden M., Sophia F. and Claire E. against all Defendants and DOES 1-25)**

24 65. Plaintiffs Ayden M., Sophia F. and Claire E. re-allege and incorporate by reference all  
25 preceding paragraphs of this Complaint as though fully set forth herein.

26 66. By nature of the meticulous cultivation of their individual brands, Plaintiffs Ayden M.,  
27 Sophia F. and Claire E.'s names, identities and personas have become, and are, very valuable



1 worldwide and are invested with substantial goodwill in the eyes of the public. Accordingly, Plaintiffs  
2 Ayden M., Sophia F. and Claire E. have a valuable right of publicity, a property right with substantial  
3 commercial value, which they have not agreed to license or transfer, whether in whole or in part, to  
4 Defendants, or any of them, for any purpose whatsoever. Plaintiffs Ayden M., Sophia F. and Claire  
5 E.'s names, identities and personas have substantial commercial value based at least in part on the  
6 revenue derived from Plaintiffs Ayden M., Sophia F. and Claire E.'s YouTube channels as set forth in  
7 Exhibits 3C – 3F, 7C – 7F and 9C – 9F, respectively.

8           67. The wrongful acts of Defendants, and each of them, as alleged above, constitute a  
9 violation and misappropriation of Plaintiffs Ayden M., Sophia F. and Claire E.'s rights of publicity  
10 because Defendants have misappropriated Plaintiffs Ayden M., Sophia F. and Claire E.'s names,  
11 identities and personas, and used them without permission for commercial purposes to advertise and  
12 promote Piper on her YouTube channel, thereby generating significant viewership and in turn,  
13 monetized revenue.

14           68. As a direct and proximate result of Defendants' alleged wrongful acts, Plaintiffs Ayden  
15 M., Sophia F. and Claire E. have been damaged in an amount that is not yet fully ascertainable, but  
16 which exceeds the jurisdictional minimum of this Court. When Plaintiffs Ayden M., Sophia F. and  
17 Claire E. have ascertained the full amount of their damages, they will seek leave of Court to amend  
18 this Complaint accordingly.

19           69. By reason of Defendants' wrongful acts, in addition to the relief sought herein,  
20 Plaintiffs Ayden M., Sophia F. and Claire E. are entitled to an accounting of all of Defendants'  
21 revenues and profits associated with the unauthorized use of Plaintiffs Ayden M., Sophia F. and Claire  
22 E.'s names, identities and personas, and to an award of all such sums. Defendants are involuntary  
23 trustees holding all such sums in their possession under a constructive trust for the benefit of Plaintiffs  
24 Ayden M., Sophia F. and Claire E. with a duty to transfer same.

25           70. Plaintiffs Ayden M., Sophia F. and Claire E. are informed and believe, and based  
26 thereon allege, that Defendants, in doing the things herein alleged, acted maliciously, oppressively and  
27 fraudulently, and with full knowledge of the adverse effect of their actions on Plaintiffs Ayden M.,  
28

1 Sophia F. and Claire E. and with willful and deliberate disregard for the consequences to them. By  
2 reason thereof, Plaintiffs Ayden M., Sophia F. and Claire E. are entitled to recover punitive and  
3 exemplary damages from Defendants in an amount to be determined at the time of trial.

4 **THIRD CAUSE OF ACTION**

5 **UNJUST ENRICHMENT**

6 **(By Plaintiffs Ayden M., Sophia F. and Claire E. against all Defendants and DOES 1-25)**

7 71. Plaintiffs Ayden M., Sophia F. and Claire E. re-allege and incorporate by reference all  
8 preceding paragraphs of this Complaint as though fully set forth herein.

9 72. As a result of Defendants' wrongful acts, Defendants, and each of them, have been  
10 unjustly enriched and benefitted. Such unjust enrichment and benefits include, but are not limited to:  
11 (1) the value of the use of Plaintiffs Ayden M., Sophia F. and Claire E.'s names, identities and personas  
12 for the commercial purposes made thereof by Defendants; and (2) the amount of Defendants' revenues  
13 and profits attributable to the use of Plaintiffs Ayden M., Sophia F. and Claire E.'s names, images,  
14 identities and personas as alleged herein.

15 73. Defendants, and each of them, are under an obligation to pay Plaintiffs Ayden M.,  
16 Sophia F. and Claire E. forthwith, the entire amount by which they have been unjustly enriched, and  
17 Plaintiffs Ayden M., Sophia F. and Claire E. are entitled to the imposition of a constructive trust, such  
18 that Defendants, and each of them, are involuntary trustees holding all such sums in their possession  
19 for the benefit of Plaintiffs Ayden M., Sophia F. and Claire E. with a duty to transfer the same to them.

20 **FOURTH CAUSE OF ACTION**

21 **INTENTIONAL INTERFERENCE WITH CONTRACTUAL RELATIONS**

22 **(By Plaintiffs Sawyer S., Donlad D., Ayden M., Connor C., Hayden H., Walker B.,**

23 **Sophia F., Symonne H. and Claire E. against all Defendants and DOES 1-25)**

24 74. Plaintiffs re-allege and incorporate by reference all preceding paragraphs of this  
25 Complaint as though fully set forth herein.

26 75. Defendants knew of the relationship between Plaintiffs and YouTube, which included  
27 not only Plaintiffs' participation in YouTube's "Partner Program," but also Plaintiffs' relationships

1 with their YouTube channel subscribers and viewers, both of which are essential to Plaintiffs’  
2 continued business success in driving viewership of their posted creative content, which in turn, affects  
3 Plaintiffs’ revenue generation from YouTube. Plaintiffs aver that Defendants, and each of them,  
4 intentionally interfered with the existing contract between Plaintiffs and YouTube (i.e. the “Partner  
5 Program.”)

6 76. On information and belief, Defendants, and each of them, knew of Plaintiffs’  
7 participation with YouTube’s “Partner Program,” but nevertheless undertook such wrongful actions  
8 as alleged in this Complaint with the intention of disrupting the performance of that contract and  
9 otherwise preventing the performance thereof or, at the least, making such performance more difficult  
10 and less lucrative for Plaintiffs.

11 77. The wrongful conduct of Defendants as alleged herein made the performance of the  
12 contract between Plaintiff and YouTube more difficult and less lucrative for Plaintiffs.

13 78. On information and belief, Defendants, and each of them, by their wrongful conduct  
14 as set forth herein, intended to disrupt the performance of the contract between Plaintiffs and YouTube,  
15 or knew or should have known that such wrongful conduct was certain or substantially certain to  
16 disrupt and/or interfere with the performance of that contract.

17 79. As a direct and proximate result of Defendants’ wrongful conduct in interfering with  
18 the performance and benefit of Plaintiffs’ contract with YouTube, Plaintiffs have been generally,  
19 specially and consequentially damaged in an amount to be established according to evidence at the  
20 time of trial, but in no event less than the difference in estimated average revenue derived from  
21 Plaintiffs’ YouTube channels from the time of Plaintiffs’ association with Piper’s “Squad” to the time  
22 that Plaintiffs left the “Squad” and the time that Plaintiffs left the “Squad” to the present as set forth  
23 in Paragraphs 42-50 of this Complaint and Exhibits 1C – 1F through 9C – 9F.

24 80. Defendants’ interference with Plaintiffs’ contractual relations with YouTube was  
25 willful and intentional, was undertaken by means of oppression, fraud and malice and in conscious  
26 disregard of Plaintiffs’ rights, and was intended to, and did in fact, inflict injury on Plaintiffs.  
27 Therefore, Plaintiffs are entitled to an award of exemplary or punitive damages under Civil Code §  
28

1 3294 in an amount to be established at trial, in order to meaningfully punish Defendants, and each of  
2 them, and to thereby deter similar conduct by them in the future.

3 **FIFTH CAUSE OF ACTION**

4 **INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE**

5 **(By Plaintiffs Sawyer S., Donlad D., Ayden M., Connor C., Hayden H., Walker B.,**  
6 **Sophia F., Symonne H. and Claire E. against all Defendants and DOES 1-25)**

7 81. Plaintiffs re-allege and incorporate by reference all preceding paragraphs of this  
8 Complaint as though fully set forth herein.

9 82. At all relevant times, Defendants were aware of Plaintiffs' existing and potential  
10 relationships with their subscribers, viewers, advertisers and other business opportunities associated  
11 with maintaining high levels of viewership on their respective YouTube channels—all of which  
12 Plaintiffs were likely to derive future economic benefits from.

13 83. Defendants, and each of them, knew of the relationship between Plaintiffs and  
14 YouTube, which included not only Plaintiffs' participation in YouTube's "Partner Program" (link:  
15 [YouTube Partner Program overview & eligibility - YouTube Help \(google.com\)](https://www.youtube.com/help/partner-program-overview)), but also Plaintiffs'  
16 relationships with their YouTube channel subscribers and viewers, both of which are essential to  
17 Plaintiffs' continued business success in driving viewership of their posted creative content, which in  
18 turn, affects Plaintiffs' revenue generation from YouTube.

19 84. Defendants, and each of them, knew or acted in reckless disregard that the above-  
20 described actions and conduct, which gave rise to Defendants' alleged sabotage of Plaintiffs' YouTube  
21 channels, would cause Plaintiffs severe and extensive interference in their relationship with their  
22 subscribers and viewers as well as their economic relationship with YouTube by virtue of the  
23 disruption or elimination of Plaintiffs' ability to garner revenue streams through their participation in  
24 the "Partner Program" with YouTube.

25 85. Defendants and each of them, knew and acted in reckless disregard that the above-  
26 described actions and conduct, which gave rise to Defendants' alleged sabotage of Plaintiffs' YouTube  
27 channels, would cause Plaintiffs severe and extensive interference with its economic relationships and  
28

1 in fact caused Plaintiffs' YouTube channel subscribers and viewers to precipitously decline, thereby  
2 negatively affecting Plaintiffs' bottom lines.

3 86. In committing the wrongful acts alleged in this Complaint, Defendants, and each of  
4 them have: (a) intentionally interfered with such prospective economic advantage; (b) acted with the  
5 sole purpose of harming Plaintiffs thereby; (c) employed wrongful methods in effecting such  
6 interference; and (d) interfered with such prospective economic advantage.

7 87. Specifically, Plaintiffs aver that Ms. Smith and Mr. Hill have conspired amongst  
8 themselves to drive down "subscribers" and video "views" from Plaintiffs' YouTube channels by  
9 participating in, directing or performing the following unfair and/or unlawful conduct:

- 10 a. Using software to repeatedly "flag" or "report" content as either "inappropriate" or  
11 "outside YouTube's safety standards" so as to have content marked as "restricted" which  
12 in turn drives down "views" and "suggested views" on the YouTuber's channel;
- 13 b. Negatively manipulating YouTube's suggestive algorithm for video "views" based on  
14 "flagged" content and/or otherwise "negative" content;
- 15 c. Utilizing "bots" to quickly "subscribe" and "unsubscribe" to a Plaintiffs' YouTube  
16 channels, which results in YouTube not recommending that user's channel.
- 17 d. Conspiring with an inside YouTube analytics employee known as "Alex" to either  
18 accomplish a—c, or, use alternative means to do so.
- 19 e. Embedding Plaintiffs' videos on porn sites, which causes viewers to come in from those  
20 sites onto Plaintiffs' YouTube channels, which makes YouTube's algorithm think that  
21 Plaintiffs' videos are "sexual" or "inappropriate", and thus restricts them for viewing.
- 22 f. Using software or "virtual assistants" from other countries such as India, Russia and  
23 Pakistan to leave derogatory comments on Plaintiffs' YouTube videos and live chats,  
24 which negatively affects Plaintiffs.

25 88. As a direct and proximate consequence of Defendants' wrongful acts as alleged,  
26 Plaintiffs lost, in whole or in part, their prospective economic advantages described above.

27 //



1 Plaintiffs’ economic relationships and prospective economic advantages with the number of  
2 Subscribers and Viewers on their YouTube channels through Defendants’ wrongful conduct as alleged  
3 in this Complaint, (b) agreed upon the manner in which the objectives of the conspiracy were to be  
4 achieved; and, (c) as co-conspirators each shared in the general conspiratorial objective. Plaintiffs  
5 further allege, on information and belief, that one or more persons in said conspiracy committed an  
6 unlawful and/or tortious and overt act in furtherance of said objectives as alleged hereinabove that  
7 caused injury to Plaintiffs.

8 94. Plaintiffs are informed and believe, and based thereon allege, that the Defendants, as  
9 part of said conspiracy, did the acts herein alleged pursuant to, and in furtherance of, an agreement  
10 and conspiracy amongst them: (a) to cause Plaintiffs to lose and/or otherwise suffer a significant  
11 decline in “subscribers” and viewers on their YouTube channels, (b) to otherwise to interfere with  
12 Plaintiffs’ business relationships and economic advantage and, in furtherance of said objectives,  
13 committed such unlawful and/or tortious acts, including, but not limited to, interference with economic  
14 relationship and interference with prospective economic advantage, as alleged hereinabove.

15 95. As a direct and proximate result of the conspiracy, Plaintiffs have been generally,  
16 specially and consequentially damaged in an amount to be established according to evidence,  
17 including, but not limited to: (i) damages suffered by Plaintiffs as a direct and proximate result of  
18 Defendants’ interference with Plaintiffs’ business, revenue stream with YouTube and injury to their  
19 reputation, in an amount no less than the difference in estimated average revenue derived from  
20 Plaintiffs’ YouTube channels from the time of Plaintiffs’ association with Piper’s “Squad” to the time  
21 that Plaintiffs left the “Squad” and the time that Plaintiffs left the “Squad” to the present as set forth  
22 in Paragraphs 42-50 of this Complaint and Exhibits 1C – 1F through 9C – 9F; (ii) Plaintiffs’ litigation  
23 costs and attorneys’ fees.

24 96. The conspiracy among Defendants, having acted willfully and intentionally and by  
25 means of oppression, fraud and malice and in conscious disregard of Plaintiffs’ rights, was intended  
26 to, and did in fact, inflict injury on Plaintiffs. Therefore, Plaintiffs are entitled to an award of exemplary  
27 or punitive damages under Civil Code § 3294 in an amount to be established at trial, in order to  
28

1 meaningfully punish Defendants, and each of them, and to thereby deter similar conduct by them in  
2 the future.

3 **SEVENTH CAUSE OF ACTION**

4 **SEXUAL BATTERY**

5 **(By Plaintiffs Connor C., Corinne D., Sophia F., Claire E., and Reese E. against**  
6 **Defendant Ms. Smith and DOES 1-25)**

7 97. Plaintiffs Connor C., Corinne D., Sophia F., Claire E. and Reese E. re-allege and  
8 incorporate by reference all preceding paragraphs of this Complaint as though fully set forth herein.

9 98. Ms. Smith intentionally, recklessly, and wantonly did those acts as alleged in Paragraph  
10 35(a)-(z), which were intended to, and did, result in harmful and offensive contact with intimate parts  
11 of Plaintiffs Connor C., Corinne D., Sophia F., Claire E. and Reese E.

12 99. Ms. Smith committed the acts as set forth in Paragraph 35(a)-(z) with the intent to cause  
13 a harmful or offensive contact with intimate parts of Plaintiffs Connor C., Corinne D., Sophia F., Claire  
14 E. and Reese E. and that would offend a reasonable sense of personal dignity. Further, said acts did  
15 cause a harmful or offensive contact with intimate parts of Plaintiffs Connor C., Corinne D., Sophia  
16 F., Claire E. and Reese E. that would offend a reasonable sense of personal dignity.

17 100. Ms. Smith, in doing the wrongful acts herein alleged in Paragraph 35(a)-(z), including  
18 intending to subject Plaintiffs Connor C., Corinne D., Sophia F., Claire E. and Reese E. to sexual  
19 abuse, harassment, and molestation before, during and after video shoots and content creation sessions,  
20 intended to cause harmful or offensive contact to Plaintiffs Connor C., Corinne D., Sophia F., Claire  
21 E. and Reese E., or intended to put Plaintiffs Connor C., Corinne D., Sophia F., Claire E. and Reese  
22 E. in imminent apprehension of such contact.

23 101. Regarding Plaintiffs Connor C., Corinne D., Sophia F., Claire E. and Reese E., on  
24 several occasions, Ms. Smith spanked and/or slapped their buttocks, including poking / prodding her  
25 finger against Plaintiffs' anuses through their clothing.

26 102. Regarding Plaintiff Reese E., on one occasion, Ms. Smith moved her hand up Reese  
27 E.'s exposed leg toward her vagina when Reese E. recoiled and knocked her hand away. On another  
28



1 occasion, and in “Lenny the Cat’s” voice, Ms. Smith grabbed a broom and rubbed the broom handle  
2 all over Reese E.’s face and head telling her it was “Lenny’s big smelly penis.” On yet another  
3 occasion, and after running into a bathroom to hide from Ms. Smith, Reese E. heard Ms. Smith outside  
4 the door tell her: “Reese, I have my pants down...do you want to come see?” When Reese E. finally  
5 left the bathroom, Ms. Smith ambushed her, grabbed her by the neck, tossed her onto the bed and  
6 began pretending that her right arm was “Lenny’s penis” and rubbed it all over Reese E.’s face, head  
7 and mouth.

8           103. Regarding Plaintiff Claire E., Ms. Smith sexually touched her on numerous occasions  
9 by rubbing her exposed thighs and moving her hand toward her vagina, commented on how “big”  
10 Claire E.’s breasts looked and then attempting to squeeze them, and on one occasion, taking a wooden  
11 spoon and smacking it all over Claire E.’s body. Ms. Smith also tried to spit in Claire E.’s mouth and  
12 on her face one time when Ms. Smith was hovering over her after Claire E. woke up in the morning.

13           104. Plaintiffs Connor C., Corinne D., Sophia F., Claire E. and Reese E did not consent to  
14 Ms. Smith’s intended harmful or offensive contact with them, or intention to put them in imminent  
15 apprehension of such contact.

16           105. In doing the wrongful acts alleged in Paragraph 35(a)-(z), Ms. Smith violated Plaintiffs  
17 Connor C., Corinne D., Sophia F., Claire E. and Reese E.’s rights, pursuant to Civil Code section 43  
18 of protection from bodily restraint or harm and from personal insult. In doing the wrongful acts herein  
19 alleged, Ms. Smith violated her duty, pursuant to Civil Code section 1708, to abstain from injuring  
20 Plaintiffs or infringing upon their rights.

21           106. As a result of the above-described conduct as alleged in Paragraph 35(a)-(z), Plaintiffs  
22 Connor C., Corinne D., Sophia F., Claire E. and Reese E. were put at unnecessary risk of harm, and  
23 in some cases, suffered and continue to suffer great pain of mind and body, shock, emotional distress,  
24 physical manifestations of emotional distress including depression, anxiety, humiliation, loss of  
25 enjoyment of life, and fear of working in the entertainment industry; have suffered and continue to  
26 suffer and were prevented and will continue to be prevented from performing daily activities and  
27

1 obtaining the full enjoyment of life; may sustain loss of earnings and earning capacity; and may incur  
2 expenses for medical and psychological treatment, therapy, and counseling.

3 107. Plaintiffs Connor C., Corinne D., Sophia F., Claire E. and Reese E. have suffered  
4 damages, both general and special damages, in an amount presently unknown but exceeding the  
5 minimum jurisdictional limit of this Court and as proven at the time of trial.

6 108. In subjecting Plaintiffs Connor C., Corinne D., Sophia F., Claire E. and Reese E. to the  
7 wrongful acts herein described and as set forth in detail in Paragraph 35(a)-(z), Ms. Smith acted  
8 willfully and maliciously with the intent to harm them, and in conscious disregard of their rights, so  
9 as to constitute malice and oppression under Civil Code section 3294. Plaintiffs Connor C., Corinne  
10 D., Sophia F., Claire E. and Reese E. are therefore entitled to the recovery of punitive damages against  
11 Ms. Smith, in an amount to be determined at trial.

## 12 EIGHTH CAUSE OF ACTION

### 13 BATTERY

14 **(By Plaintiffs Connor C., Corinne D., Sophia F., Claire E. and Reese E. against Defendant Ms.  
15 Smith and DOES 1-25)**

16 109. Plaintiffs Connor C., Corinne D., Sophia F., and Reese E. re-allege and incorporate by  
17 reference all preceding paragraphs of this Complaint as though fully set forth herein.

18 110. On repeated occasions as alleged herein, Ms. Smith inappropriately touched Plaintiffs  
19 Connor C., Corinne D., Sophia F., Claire E. and Reese E. as set forth in this Complaint and specifically  
20 in Paragraph 35(a)-(z) with the intent to cause harm or distress to them.

21 111. Plaintiffs Connor C., Corinne D., Sophia F., Claire E. and Reese E. did not consent to  
22 Ms. Smith's inappropriate touching as set forth in Paragraph 35(a)-(z).

23 112. Plaintiffs Connor C., Corinne D., Sophia F., Claire E. and Reese E. were harmed by  
24 Ms. Smith's inappropriate and wrongful conduct as set forth in Paragraph 35(a)-(z).

25 113. These acts by Ms. Smith did cause a harmful or offensive contact with intimate parts  
26 of Plaintiffs Connor C., Corinne D., Sophia F., Claire E. and Reese E.'s person as set forth in Paragraph  
27 35(a)-(z) that would offend a reasonable person in their positions.







1 but also constitutes unfair competition by driving viewers and “subscribers” away from these  
2 Plaintiffs—whom are all Piper’s competitors in the social media marketplace and other lucrative  
3 forums.

4 130. By such violations, Defendants have enriched themselves to the detriment of Plaintiffs  
5 and no doubt others similarly situated.

6 131. By committing the acts and practices alleged herein, Defendants engaged in, and  
7 continue to engage in, unfair competition within the meaning of Cal. Bus. & Prof. Code §§ 17200, et  
8 seq., and Plaintiffs continues to suffer harm from these actions.

9 132. Accordingly, Plaintiffs’ are entitled to appropriate relief and all requested damages, as  
10 well as attorneys’ fees and costs expended in pursuing this action.

11 **PRAYER FOR RELIEF**

12 WHEREFORE, Plaintiffs respectfully pray for relief and judgment against Defendants, and  
13 each of them, as follows in amounts according to proof:


- 14 1. For judgment in favor of Plaintiffs against Defendants;
- 15 2. For compensatory and special damages according to proof with prejudgment interest  
16 thereon to the extent allowable by law; and specifically with respect to the Third,  
17 Fourth, Fifth and Sixth Causes of Action, in an amount no less than the collective  
18 difference in revenue before and after leaving the “Squad” derived from Plaintiffs’  
19 YouTube channels when as set forth in Exhibits 1C – 1F through 9C – 9F, believed to  
20 be at least \$2 million;
- 21 3. An award of the revenues and profits received by Defendants during the time Plaintiffs  
22 were in the “Squad” as a result of Defendants’ unauthorized use of Plaintiffs’ names,  
23 identities, personas and/or other publicity rights;
- 24 4. Preliminary and permanent injunction prohibiting Defendants and their affiliated  
25 individuals and companies from any further use of Plaintiffs’ publicity rights (including  
26 without limitation their names, images, identities, personas, voices) without Plaintiffs’  
27 express written permission or consent in advance;

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

- 5. For all penalties allowed by statute;
- 6. For damages for severe emotional distress, humiliation, grief, nervousness, worry, sadness, anger, frustration, embarrassment, stress, and mental anguish;
- 7. For punitive damages in a sum sufficient to deter Defendants' conduct;
- 8. For restitution;
- 9. For all reasonable attorneys' fees incurred by Plaintiffs in the prosecution of this matter, as permitted by statute, contract, and/or applicable law;
- 10. For costs of suit incurred herein; and
- 11. For such other and further relief as the Court deems just and proper.

DATED: January 11, 2022

**DHILLON LAW GROUP, INC.**

By:   
 Harmeet K. Dhillon  
 Matthew S. Sarelson (*pro hac vice*  
*forthcoming*)  
 Matthew M. Hoesly  
 Attorneys for Plaintiffs

**DEMAND FOR JURY TRIAL**

Plaintiffs hereby demand a jury trial on all causes of action.

DATED: January 11, 2022

**DHILLON LAW GROUP, INC.**

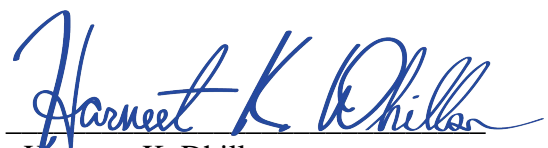
By:   
 Harmeet K. Dhillon  
 Matthew S. Sarelson (*pro hac vice*  
*forthcoming*)  
 Matthew M. Hoesly  
 Attorneys for Plaintiffs

EXHIBIT "1A"





Your channel Sawyer Sharbino

Dashboard

Content

Playlists

Analytics

Comments

Subtitles

Copyright

Monetization

Customization

Audio library

Daily Ideas

Keyword Inspector

# Channel analytics

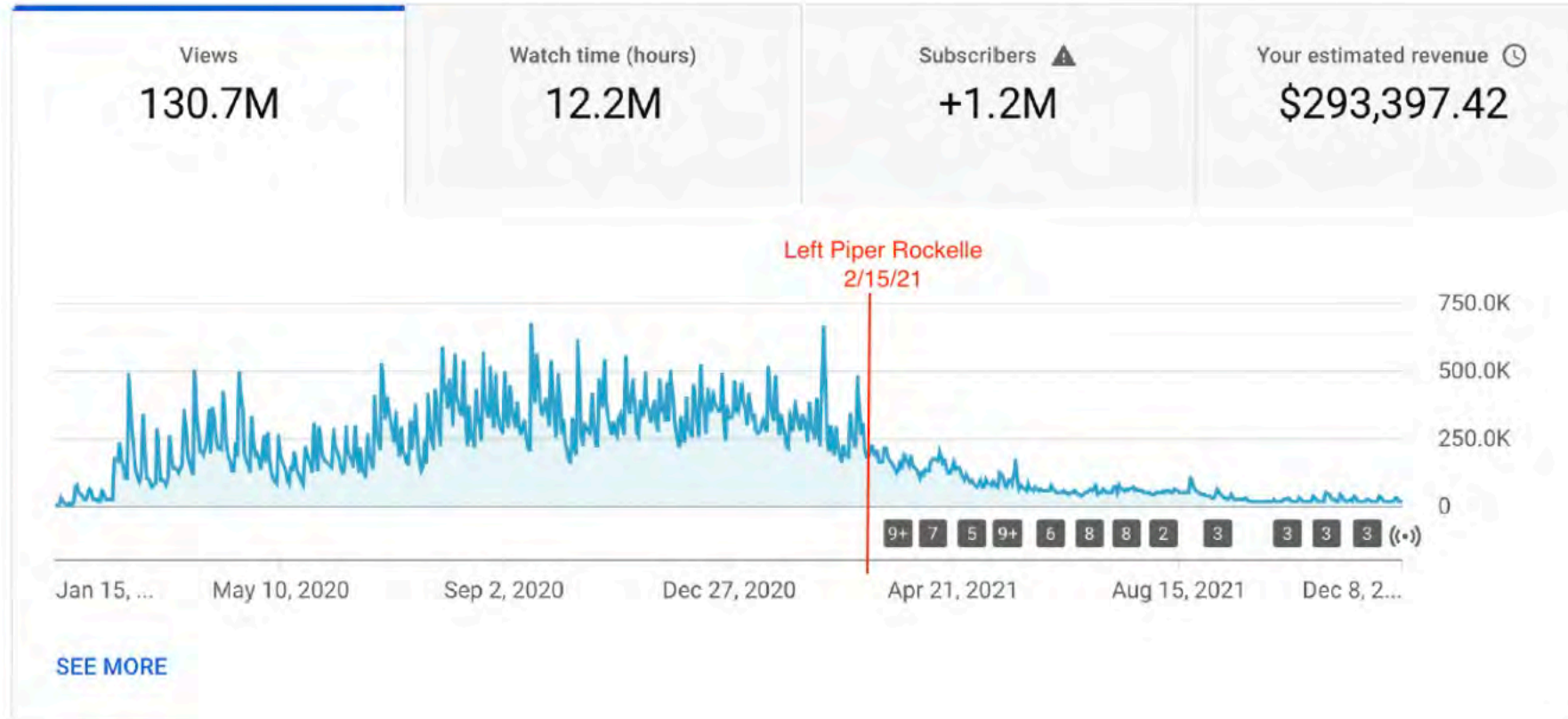
ADVANCED MODE

Overview Reach Engagement Audience Revenue

Jan 15, 2020 - Dec 8, 2021

Custom

## In the selected period, your channel got 130,707,722 views



### Realtime

Updating live

**1,292,714**

Subscribers

[SEE LIVE COUNT](#)

**41,475**

Views · Last 48 hours



Top videos

Views

- Decorating the Christmas... 5,901
- Something TERRIBLE Hap... 3,468
- KISSING My CRUSH To S... 3,081

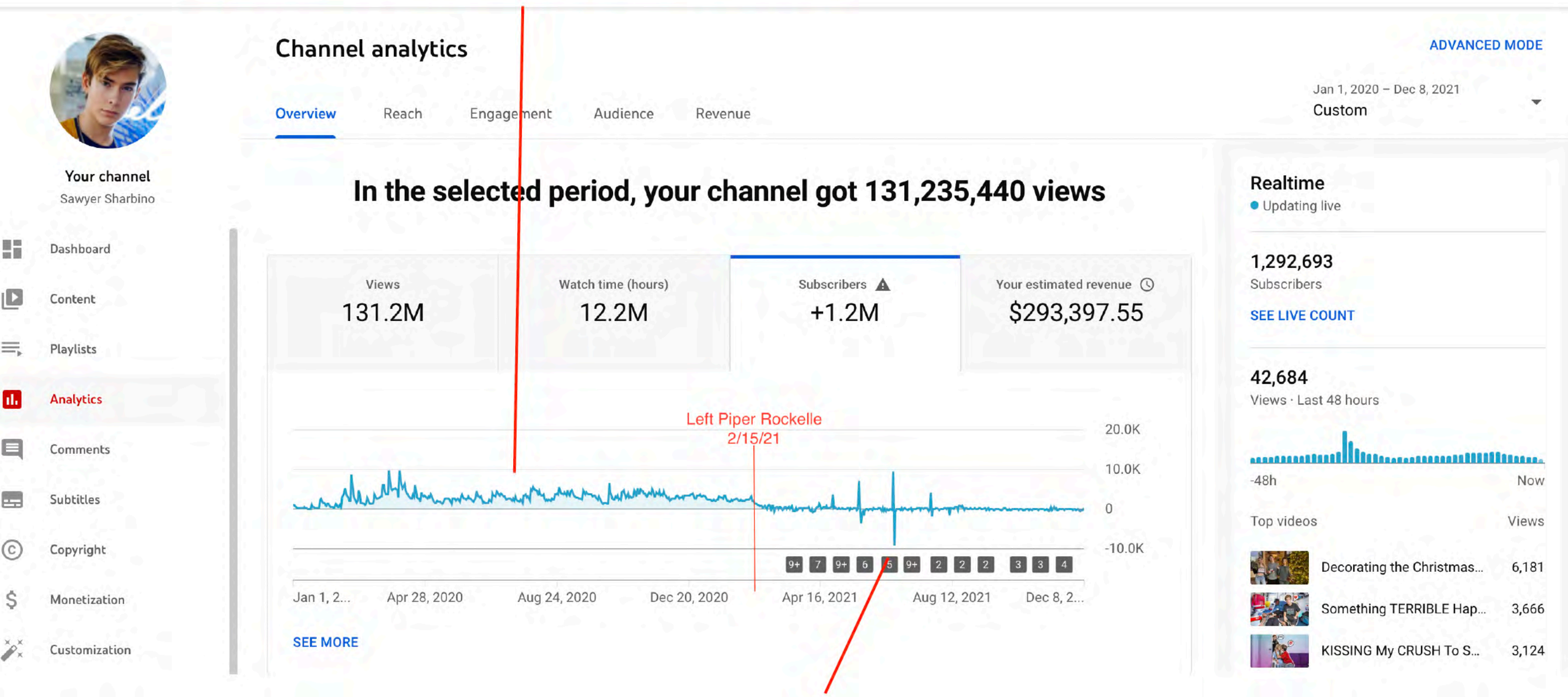
[SEE MORE](#)

### Latest videos

### Your top videos in this period

EXHIBIT "1B"

Sawyer gained an average of 80K subscribers each month before leaving squad on Feb 15 2021



After leaving squad Sawyer gained avg of 3K subscribers each month with several spikes which caused Youtube algorithm to stop recommending or suggesting his content

EXHIBIT "1C"



Your channel  
Sawyer Sharbino

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Copyright
- Monetization
- Customization
- Audio library

# Channel analytics

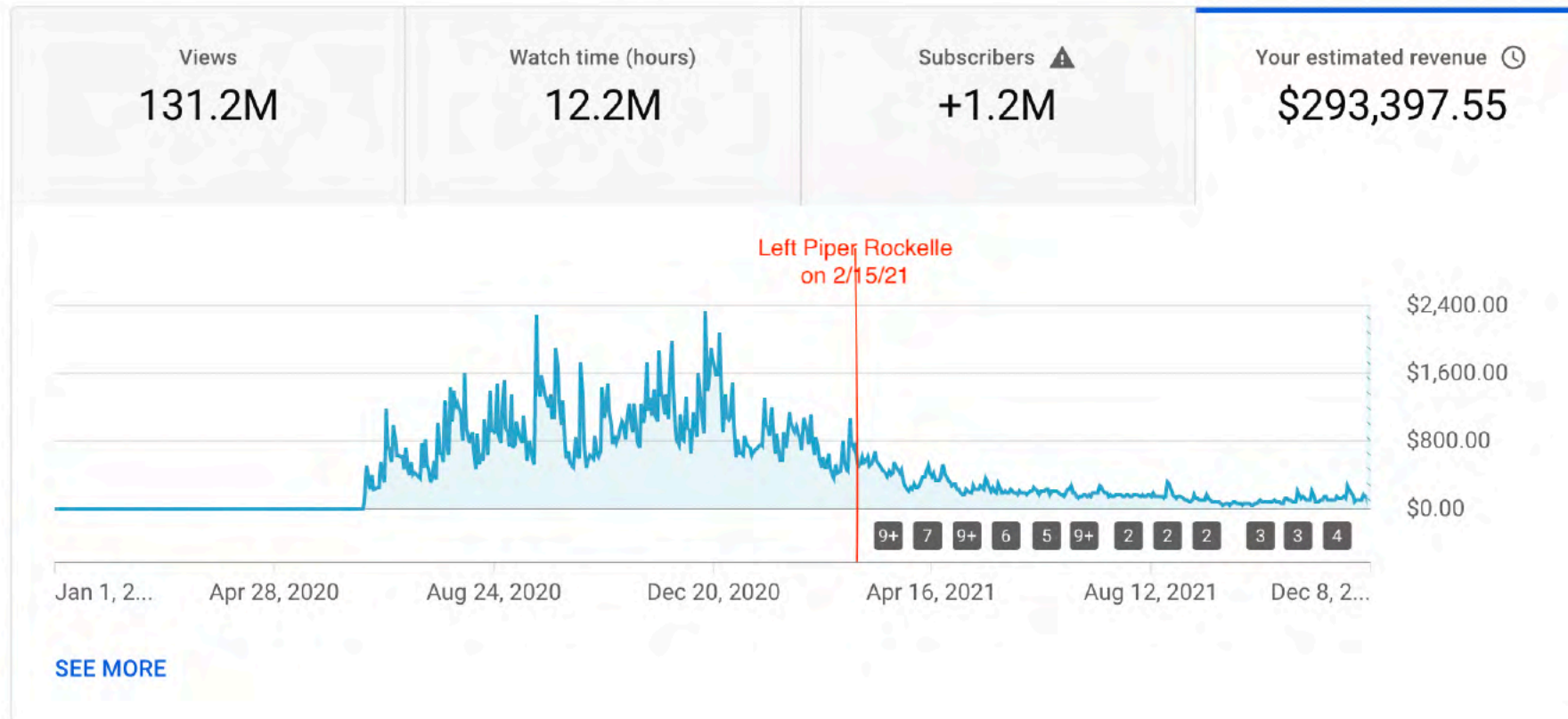
ADVANCED MODE

Jan 1, 2020 – Dec 8, 2021

Custom

- Overview**
- Reach
- Engagement
- Audience
- Revenue

## In the selected period, your channel got 131,235,440 views



### Realtime

● Updating live

**1,292,698**

Subscribers

[SEE LIVE COUNT](#)

**42,315**

Views · Last 48 hours



Top videos

Views

- Decorating the Christmas... 6,049
- Something TERRIBLE Hap... 3,664
- KISSING My CRUSH To S... 3,034

[SEE MORE](#)

EXHIBIT "1D"



Your channel  
Sawyer Sharbino

# Channel analytics

ADVANCED MODE

Jan 10, 2020 – Feb 16, 2021

Custom

Overview

Reach

Engagement

Audience

Revenue

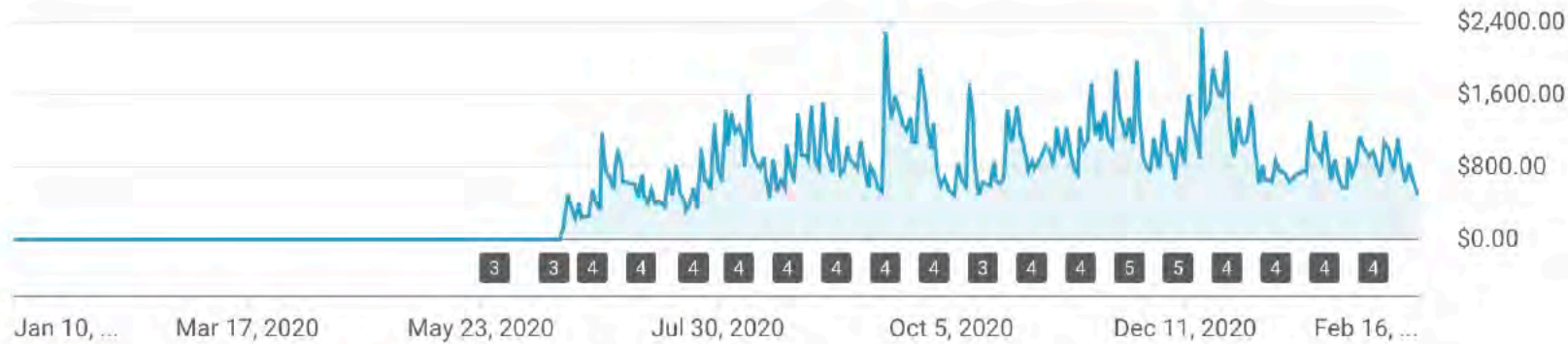
## In the selected period, your channel got 106,869,417 views

Views  
106.9M

Watch time (hours)  
10.4M

Subscribers  
+1.2M

Your estimated revenue  
\$226,760.88



[SEE MORE](#)

### Realtime

Updating live

1,292,715

Subscribers

[SEE LIVE COUNT](#)

41,353

Views · Last 48 hours



Top videos

Views

- Decorating the Christmas... 5,890
- Something TERRIBLE Hap... 3,456
- KISSING My CRUSH To S... 3,073

[SEE MORE](#)

Latest videos

### Your top videos in this period

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Copyright
- Monetization
- Customization
- Audio library
- Daily Ideas

EXHIBIT "1E"





Your channel  
Sawyer Sharbino

# Channel analytics

ADVANCED MODE

Feb 16 – Dec 8, 2021  
Custom

- Overview
- Reach
- Engagement
- Audience
- Revenue

## In the selected period, your channel got 24,134,852 views

Views  
24.1M

Watch time (hours)  
1.8M

Subscribers ▲  
+30.9K

Your estimated revenue ⓘ  
\$67,110.69



[SEE MORE](#)

### Realtime

Updating live

1,292,714

Subscribers

[SEE LIVE COUNT](#)

41,405

Views · Last 48 hours



Top videos

Views

- Decorating the Christmas... 5,893
- Something TERRIBLE Hap... 3,461
- KISSING My CRUSH To S... 3,077

[SEE MORE](#)

Latest videos

### Your top videos in this period

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Copyright
- Monetization
- Customization
- Audio library
- Daily Ideas

EXHIBIT "1F"



Channel

Sawyer Sharbino



COMPARE TO...

Filter

Jan 1, 2020 - Dec 8, 2021

Custom

Video Traffic source Geography Viewer age Viewer gender Date Revenue source Subscription status Subscription source Playlist More



Date ↓	Views	Watch time (hours)	Average view duration	Your estimated revenue
<b>Total</b>	<b>131,234,918</b>	<b>12,203,992.1</b>	<b>5:34</b>	<b>\$293,397.42</b>
December (ongoing)	184,487 0.1%	12,345.2 0.1%	4:00	\$751.68 0.3%
November	783,912 0.6%	52,650.6 0.4%	4:01	\$3,922.73 1.3%
October	772,100 0.6%	54,630.2 0.5%	4:14	\$2,757.78 0.9%
September	856,011 0.7%	60,920.5 0.5%	4:16	\$2,634.02 0.9%
August	1,703,916 1.3%	128,524.7 1.1%	4:31	\$4,996.84 1.7%
July	1,884,152 1.4%	141,040.2 1.2%	4:29	\$5,316.27 1.8%
June	1,712,831 1.3%	131,777.3 1.1%	4:36	\$6,049.32 2.1%
May	2,709,720 2.1%	184,851.5 1.5%	4:05	\$7,040.61 2.4%
April	4,198,864 3.2%	286,172.7 2.3%	4:05	\$9,945.59 3.4%
March	6,311,097 4.8%	482,358.0 4.0%	4:35	\$16,994.51 5.8%
February	7,994,223 6.1%	662,219.8 5.4%	4:58	\$19,458.21 6.6%
January	10,457,387 8.0%	1,012,336.0 8.3%	5:48	\$24,944.85 8.5%
December	10,802,102 8.2%	985,587.8 8.1%	5:28	\$38,460.96 13.1%
November	10,973,122 8.4%	962,719.9 7.9%	5:15	\$35,148.22 12.0%
October	9,880,260 7.5%	813,116.8 6.7%	4:56	\$25,979.43 8.9%
September	11,159,750 8.5%	1,098,728.0 9.0%	5:54	\$33,368.04 11.4%
August	11,874,392 9.1%	1,219,759.6 10.0%	6:09	\$30,128.32 10.3%
July	8,551,701 6.5%	823,685.8 6.8%	5:46	\$18,643.65 6.4%
June	5,894,805 4.5%	621,707.1 5.1%	6:19	\$6,856.38 2.3%
May	5,171,313 3.9%	475,258.0 3.9%	5:30	\$0.00 0.0%
April	7,195,584 5.5%	741,475.5 6.1%	6:10	\$0.00 0.0%
March	5,559,130 4.2%	717,044.7 5.9%	7:44	\$0.00 0.0%
February	3,597,952 2.7%	472,536.7 3.9%	7:52	\$0.00 0.0%
January	1,006,107 0.8%	62,545.6 0.5%	3:43	\$0.00 0.0%

Left Piper Rockelle squad

previous months = \$45,293 paid from Collab previous MCN not showing in analytics

EXHIBIT "2A"



Your channel  
DONLAD

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Copyright
- Monetization
- Customization
- Audio library

# Channel analytics

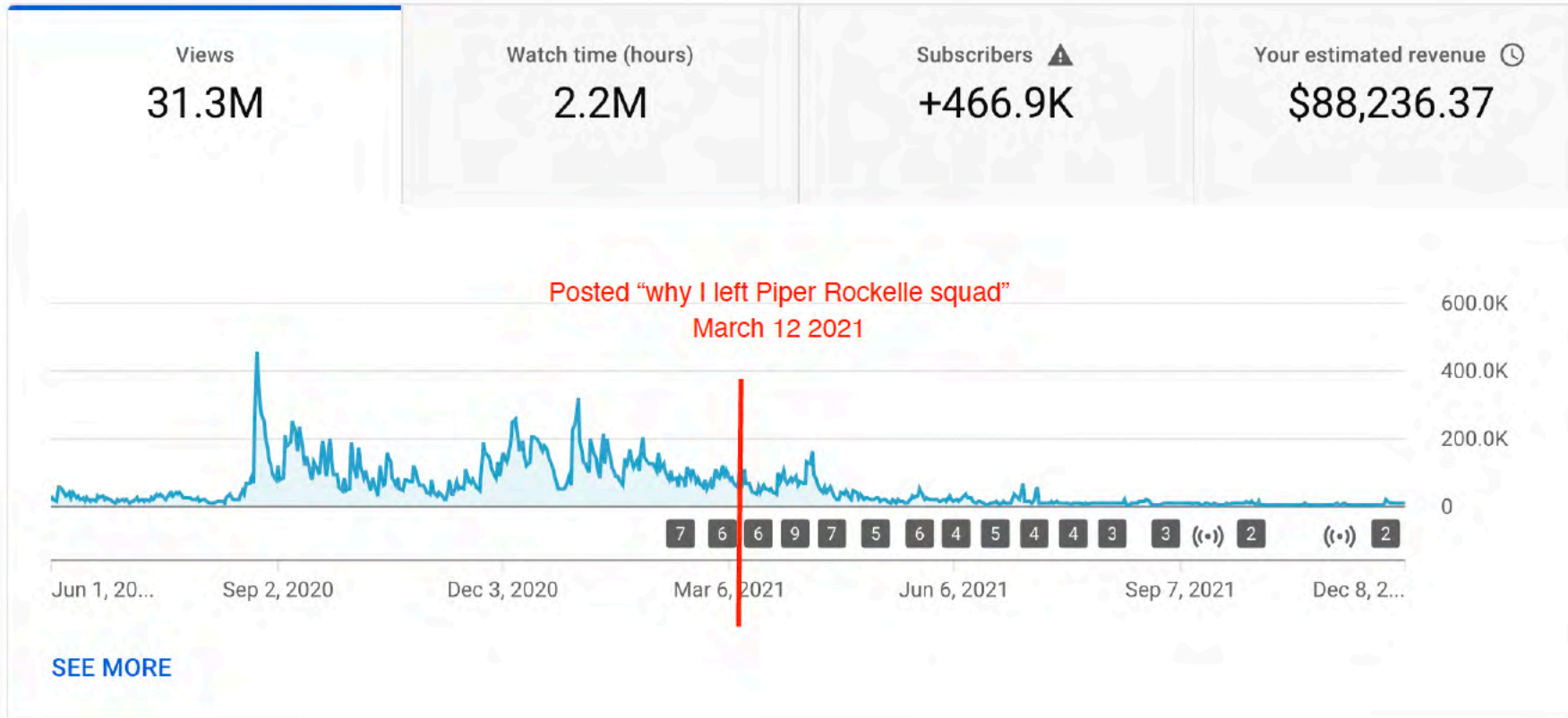
ADVANCED MODE

Jun 1, 2020 – Dec 8, 2021

Custom

- Overview**
- Reach
- Engagement
- Audience
- Revenue

## In the selected period, your channel got 31,288,706 views



### Realtime

● Updating live

**599,554**

Subscribers

[SEE LIVE COUNT](#)

**16,212**

Views · Last 48 hours



Top videos

Views

- FAZE RUG is My NEW NEI... 5,065
- I Went to Disneyland with ... 3,789
- My Best Friend ALMOST DI... 501

[SEE MORE](#)

### Your top videos in this period

EXHIBIT "2B"



Your channel  
DONLAD

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Copyright
- Monetization
- Customization
- Audio library

# Channel analytics

ADVANCED MODE

Mar 13, 2020 – Dec 9, 2021

Custom

- Overview**
- Reach
- Engagement
- Audience
- Revenue

## In the selected period, your channel got 34,574,464 views

Views <b>34.6M</b>	Watch time (hours) <b>2.4M</b>	Subscribers ▲ <b>+592.0K</b>	Your estimated revenue <b>\$92,352.55</b>
-----------------------	-----------------------------------	---------------------------------	--



[SEE MORE](#)

### Realtime

Updating live

**599,605**

Subscribers

[SEE LIVE COUNT](#)

**10,663**

Views · Last 48 hours



Top videos

Views

- I Went to Disneyland with ... 2,703
- FAZE RUG is My NEW NEI... 1,105
- My GIRLFRIEND Indi and I ... 576

[SEE MORE](#)

EXHIBIT "2C"





Your channel  
DONLAD

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Copyright
- Monetization
- Customization
- Audio library

# Channel analytics

ADVANCED MODE

Jun 1, 2020 – Dec 8, 2021

Custom

- Overview**
- Reach
- Engagement
- Audience
- Revenue

## In the selected period, your channel got 31,288,706 views

Views <b>31.3M</b>	Watch time (hours) <b>2.2M</b>	Subscribers ▲ <b>+466.9K</b>	Your estimated revenue 🕒 <b>\$88,236.37</b>
-----------------------	-----------------------------------	---------------------------------	--



[SEE MORE](#)

### Your top videos in this period

### Realtime

Updating live

**599,554**

Subscribers

[SEE LIVE COUNT](#)

**16,227**

Views · Last 48 hours



Top videos

Views

- FAZE RUG is My NEW NEI... 5,066
- I Went to Disneyland with ... 3,792
- My Best Friend ALMOST DI... 501

[SEE MORE](#)

### Latest videos

EXHIBIT "2D"



Your channel  
DONLAD

Dashboard

Content

Playlists

**Analytics**

Comments

Subtitles

Copyright

Monetization

Customization

Audio library

# Channel analytics

ADVANCED MODE

Mar 13, 2020 – Mar 12, 2021

Custom

Overview

Reach

Engagement

Audience

Revenue

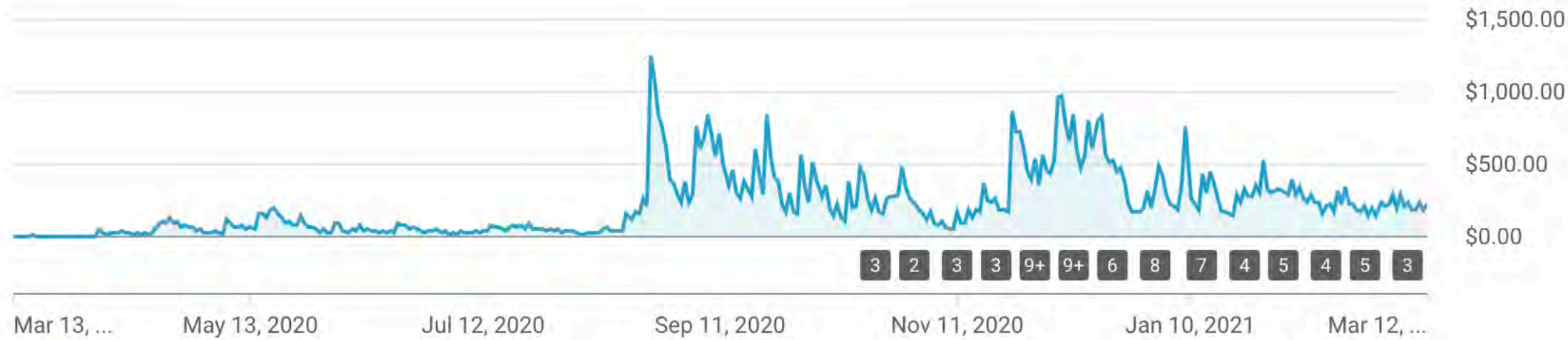
## In the selected period, your channel got 28,920,839 views

Views  
**28.9M**

Watch time (hours)  
**2.1M**

Subscribers  
**+587.1K**

Your estimated revenue  
**\$79,116.85**



[SEE MORE](#)

### Realtime

Updating live

**599,605**

Subscribers

[SEE LIVE COUNT](#)

**10,654**

Views · Last 48 hours



Top videos

Views

- I Went to Disneyland with ... 2,702
- FAZE RUG is My NEW NEI... 1,103
- My GIRLFRIEND Indi and I ... 576

[SEE MORE](#)

EXHIBIT "2E"



Your channel  
DONLAD

## Channel analytics

ADVANCED MODE

Overview Reach Engagement Audience Revenue

Mar 12 - Dec 8, 2021

Custom

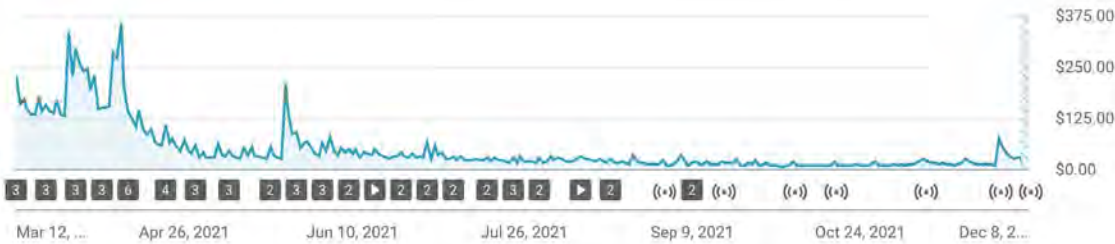
### In the selected period, your channel got 5,756,254 views

Views  
5.8M

Watch time (hours)  
301.0K

Subscribers ▲  
+5.0K

Your estimated revenue 🕒  
\$13,396.96



SEE MORE

### Realtime

Updating live

599,553

Subscribers

SEE LIVE COUNT

16,275

Views - Last 48 hours



Top videos

Views

- FAZE RUG is My NEW NEI... 5,069
- I Went to Disneyland with ... 3,807
- My Best Friend ALMOST DI... 502

SEE MORE

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Copyright
- Monetization
- Customization
- Audio library

EXHIBIT "2F"



Channel

DONLAD



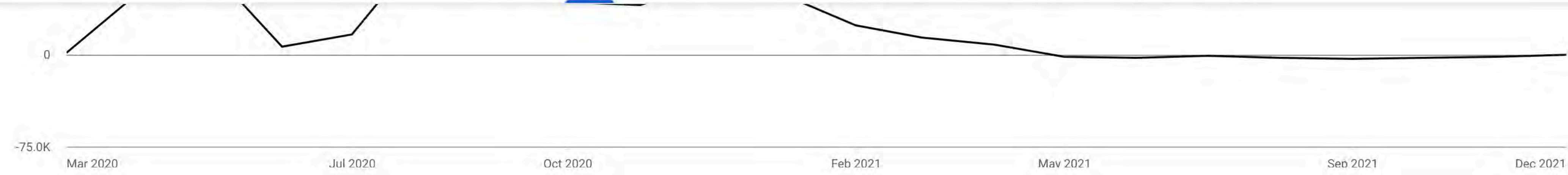
COMPARE TO...

Filter

Mar 10, 2020 – Dec 8, 2021

Custom

Video Traffic source Geography Viewer age Viewer gender **Date** Revenue source Subscription status Subscription source Playlist More



Date ↓	Subscribers ▲	Views	Watch time (hours)	Average view duration	Your estimated revenue
<b>Total</b>	<b>591,991</b>	<b>34,569,069</b>	<b>2,428,183.4</b>	<b>4:12</b>	<b>\$92,349.29</b>
March	2,007 0.3%	34,484 0.1%	1,492.2 0.1%	2:35	\$50.39 0.1%
April	51,429 8.7%	1,216,640 3.5%	75,981.0 3.1%	3:44	\$1,328.43 1.4%
May	71,701 12.1%	2,029,022 5.9%	139,321.2 5.7%	4:07	\$2,670.95 2.9%
June	6,532 1.1%	823,624 2.4%	59,452.0 2.5%	4:19	\$1,475.25 1.6%
July	16,483 2.8%	791,196 2.3%	49,898.1 2.1%	3:47	\$1,434.21 1.6%
August	89,138 15.1%	2,618,802 7.6%	163,342.1 6.7%	3:44	\$7,217.61 7.8%
September	125,124 21.1%	3,957,896 11.5%	297,801.6 12.3%	4:30	\$13,237.05 14.3%
October	43,326 7.3%	2,727,814 7.9%	206,268.4 8.5%	4:32	\$8,761.40 9.5%
November	40,794 6.9%	2,092,029 6.1%	170,576.2 7.0%	4:53	\$7,562.56 8.2%
December	60,765 10.3%	4,440,719 12.9%	363,606.3 15.0%	4:54	\$16,124.39 17.5%
January	49,089 8.3%	4,575,320 13.2%	338,106.0 13.9%	4:26	\$9,608.96 10.4%
February	23,954 4.1%	2,572,582 7.4%	200,527.4 8.3%	4:40	\$6,974.74 7.6%
March	14,056 2.4%	2,220,780 6.4%	147,233.5 6.1%	3:58	\$6,221.59 6.7%
April	8,471 1.4%	1,735,589 5.0%	92,252.3 3.8%	3:11	\$3,740.92 4.1%
May	-1,073 -0.2%	685,244 2.0%	32,817.0 1.4%	2:52	\$1,617.52 1.8%
June	-1,816 -0.3%	486,841 1.4%	19,434.4 0.8%	2:23	\$1,233.34 1.3%
July	-717 -0.1%	502,254 1.5%	25,308.5 1.0%	3:01	\$820.67 0.9%
August	-2,151 -0.4%	326,209 0.9%	15,439.4 0.6%	2:50	\$662.35 0.7%
September	-2,670 -0.5%	265,445 0.8%	11,552.1 0.5%	2:36	\$487.59 0.5%
October	-2,011 -0.3%	218,279 0.6%	7,493.2 0.3%	2:03	\$331.04 0.4%
November	-1,099 -0.2%	169,762 0.5%	6,900.3 0.3%	2:26	\$513.12 0.6%
December (ongoing)	659 0.1%	78,538 0.2%	3,380.3 0.1%	2:34	\$275.21 0.3%

Left 3/12/21

EXHIBIT "3A"





EXHIBIT "3B"



Your channel  
Ayden Mekus

# Channel analytics

ADVANCED MODE

Aug 15, 2020 - Dec 8, 2021

Custom

- Overview
- Reach
- Engagement
- Audience
- Revenue

## In the selected period, your channel got 96,404,862 views

Views <b>96.4M</b>	Watch time (hours) <b>8.5M</b>	Subscribers ▲ <b>+1.5M</b>	Your estimated revenue ⓘ <b>\$334,013.50</b>
-----------------------	-----------------------------------	-------------------------------	---

Left Piper Rockelle  
June 21 2021



SEE MORE

### Realtime

Updating live

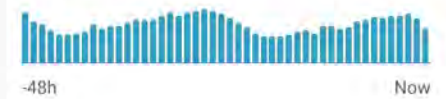
**1,511,591**

Subscribers

SEE LIVE COUNT

**69,510**

Views · Last 48 hours



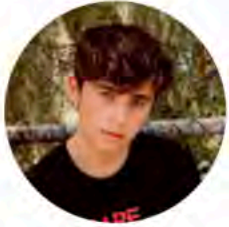
Top videos

Views

- Asking People For MON... 9,760
- REACTING To Mistletoe ... 8,926
- OUR LOVE STORY \*\* My... 5,874

- Dashboard
- Content
- Playlists
- Analytics
- Comments
- Subtitles
- Settings
- Send feedback

EXHIBIT "3C"



Your channel  
Ayden Mekus



Dashboard



Content



Playlists



Analytics



Comments



Subtitles



Settings



Send feedback

# Channel analytics

ADVANCED MODE

Overview Reach Engagement Audience Revenue

Jul 1, 2020 - Dec 9, 2021

Custom

Your estimated revenue **\$334,208.26**

RPM **\$3.48**

Playback-based CPM **\$7.45**

Left Piper Rockelle squad  
June 21 2021



SEE MORE

EXHIBIT "3D"



Your channel  
Ayden Mekus

Dashboard

Content

Playlists

Analytics

Comments

Subtitles

Copyright

Monetization

Customization

# Channel analytics

ADVANCED MODE

- Overview
- Reach
- Engagement
- Audience
- Revenue

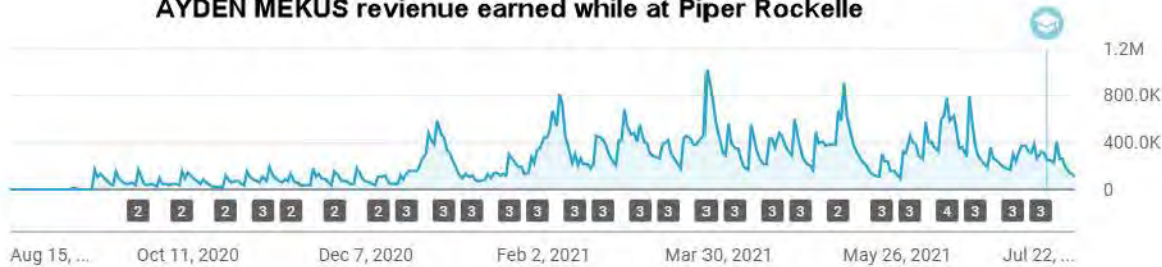
Aug 15, 2020 – Jul 22, 2021

Custom

## In the selected period, your channel got 80,376,809 views

Views <b>80.4M</b>	Watch time (hours) <b>7.2M</b>	Subscribers <b>+1.4M</b>	Your estimated revenue <b>\$263,937.88</b>
-----------------------	-----------------------------------	-----------------------------	---

### AYDEN MEKUS revenue earned while at Piper Rockelle



[SEE MORE](#)

### Realtime

Updating live

**1,511,569**

Subscribers

[SEE LIVE COUNT](#)

**69,157**

Views - Last 48 hours



Top videos

Views

- |  |                           |       |
|--|---------------------------|-------|
|  | Asking People For MONE... | 9,993 |
|  | REACTING To Mistletoe ... | 8,861 |
|  | OUR LOVE STORY ** My ...  | 5,839 |

EXHIBIT "3E"





Your channel  
Ayden Mekus

# Channel analytics

ADVANCED MODE

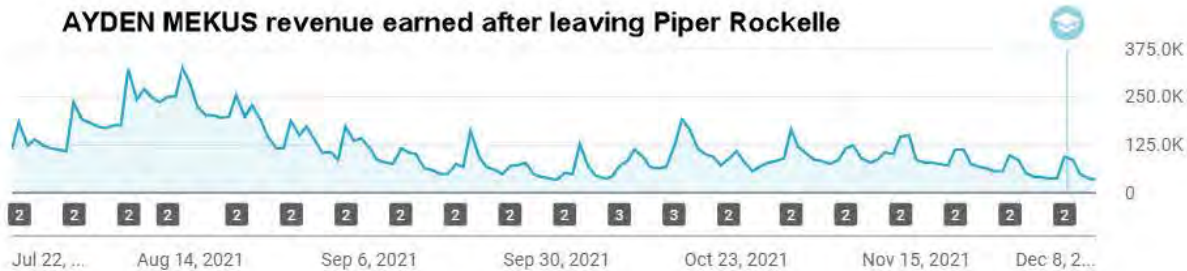
- Overview**
- Reach
- Engagement
- Audience
- Revenue

Jul 22 – Dec 8, 2021  
Custom

## In the selected period, your channel got 16,138,053 views

Views <b>16.1M</b>	Watch time (hours) <b>1.3M</b>	Subscribers <b>+96.1K</b>	Your estimated revenue ⓘ <b>\$70,495.48</b>
-----------------------	-----------------------------------	------------------------------	--

### AYDEN MEKUS revenue earned after leaving Piper Rockelle



[SEE MORE](#)

### Realtime

Updating live

**1,511,569**

Subscribers

[SEE LIVE COUNT](#)

**69,215**

Views · Last 48 hours



Top videos

Views

- Asking People For MONE... 9,998
- REACTING To Mistletoe ... 8,869
- OUR LOVE STORY \*\* My ... 5,847

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Copyright
- Monetization
- Customization

EXHIBIT "3F"



Channel

Ayden Mekus



COMPARE TO...

Aug 15, 2020 – Dec 9, 2021

Custom

Filter

Video Traffic source Geography Viewer age Viewer gender Date Revenue source Subscription status Subscription source Playlist More

Aug 2020 Nov 2020 Jan 2021 Apr 2021 Jul 2021 Sep 2021 Dec 2021

Date ↓	Views		Watch time (hours)		Average view duration	Your estimated revenue	
<b>Total</b>	<b>96,439,100</b>		<b>8,491,615.8</b>		<b>5:16</b>	<b>\$334,546.95</b>	
December (ongoing)	453,764	0.5%	29,792.1	0.4%	3:56	\$2,198.15	0.7%
November	2,637,159	2.7%	212,683.8	2.5%	4:50	\$15,000.63	4.5%
October	2,785,859	2.9%	193,664.6	2.3%	4:10	\$12,552.66	3.8%
September	2,507,000	2.6%	209,111.3	2.5%	5:00	\$11,864.08	3.6%
August	6,340,703	6.6%	555,614.1	6.5%	5:15	\$23,895.51	7.1%
July	7,248,137	7.5%	690,013.8	8.1%	5:42	\$27,362.31	8.2%
June	11,815,941	12.3%	1,047,173.6	12.3%	5:19	\$49,018.66	14.7%
May	10,295,383	10.7%	1,046,430.8	12.3%	6:05	\$36,607.24	10.9%
April	10,507,674	10.9%	1,029,749.9	12.1%	5:52	\$32,569.05	9.7%
March	13,490,401	14.0%	1,200,648.6	14.1%	5:20	\$43,105.30	12.9%
February	11,082,411	11.5%	841,280.7	9.9%	4:33	\$25,993.48	7.8%
January	5,543,788	5.8%	412,533.1	4.9%	4:27	\$10,693.11	3.2%
December	5,232,735	5.4%	392,996.3	4.6%	4:30	\$19,671.97	5.9%
November	2,613,574	2.7%	263,734.6	3.1%	6:03	\$10,063.08	3.0%
October	2,161,718	2.2%	228,370.9	2.7%	6:20	\$9,572.29	2.9%
September	1,675,553	1.7%	136,949.5	1.6%	4:54	\$4,379.44	1.3%
August	47,300	0.1%	868.0	0.0%	1:06	\$0.00	0.0%

EXHIBIT "4A"



YouTube Studio  
Open in the YT Studio app

OPEN

Channel analytics

ADVANCED MODE

Aug 1, 2020 - Dec 8, 2021  
Custom

Overview Reach Engagement Audience Revenue

Returning viewers ▲

Unique viewers ▲

Subscribers ▲

Total members ▲

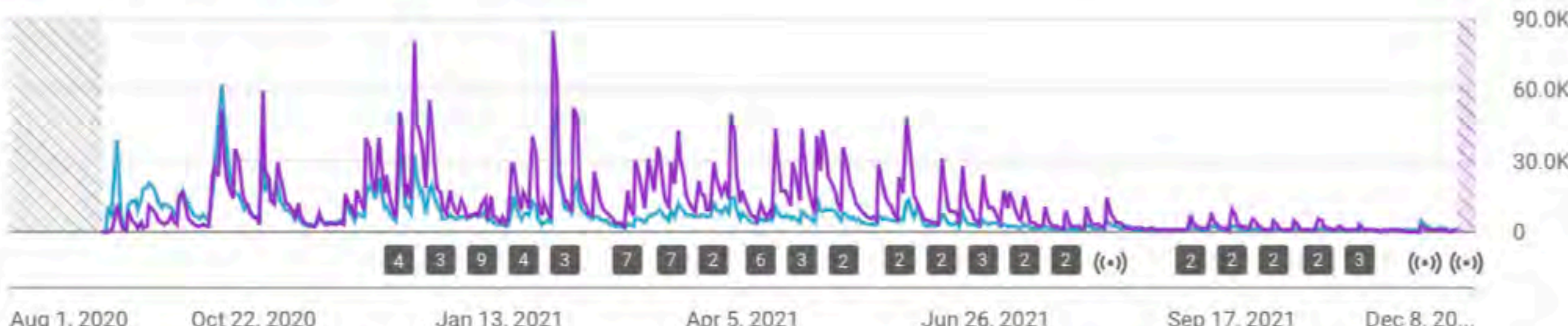
—

—

+271.6K

+5

Returning viewers (purple) New viewers (teal)



SEE MORE

Chart guide ?

When your viewers are on YouTube

Your local time (GMT-0800) - Last 28 days



ⓘ Publish time is not known to directly affect the long-term performance of a video. [Learn more](#)

Other channels your audience watches

Last 28 days

- Piper Rockelle  
8.6M subscribers
- Jentzen Ramirez  
1.9M subscribers
- elliana  
1.1M subscribers
- Emily Dobson  
1.6M subscribers
- Lev Cameron  
2.1M subscribers

< 1/3 >

Other videos your audience watched

Last 7 days

- OMG...A BABY!!  
Piper Rockelle · 2.5M views · 6 days ago
- Reading OUR hate comments \*\*we cried\*\* 😭...  
Nick Bencivengo · 142.6K views · 1 week ago
- PASSING OUT INTO MY FRIENDS ARMS \*\*Fun...  
Emily Dobson · 652.4K views · 1 week ago
- I'm Buying A NEW HOUSE \*\*BIG REVEAL\*\* Jelli...  
elliana · 232.9K views · 6 days ago
- MOVING IN With Piper Rockelle Without Her K...  
Jentzen Ramirez · 167.3K views · 6 days ago

< 1/3 >

Subscriber bell notifications ⓘ

Percent of total subscribers · Current

- Subscribers who turned on "All notifications" for your channel  
41.2% (111.8K)  
Typical on YouTube: 10% - 30%
- Subscribers who turned on "All notifications" for your channel and enabled YouTube notifications  
23.7% (64.4K)  
Typical on YouTube: 5% - 20%

ⓘ Notifications can't reach subscribers who disabled notifications on the YouTube app or signed out. [Learn more](#)

Watch time from subscribers

Watch time - Aug 1, 2020 - Dec 8, 2021

Top geographies

Views - Aug 1, 2020 - Dec 8, 2021



EXHIBIT "4B"

# Channel analytics

ADVANCED M

Aug 1, 2020 – Dec 8, 2021

Custom

Overview

Reach

Engagement

Audience

Revenue

In the selected period, your channel got  
**12,394,906 views**

Views	Watch time (hours)	Subscribers ▲	Your estimated revenue 🕒
12.4M	1.1M	+271.6K	\$39,687.49

Before leaving Connor averaged 25K subscribers/mo

Left Piper Rockelle June 21 2021

After leaving Connor loses subscribers each month



6 9+ 6 4 9+ 3 8 2 3 4 3 2 3 3 3 3 (••)

Aug ... Oct 22, 2020 Jan 13, 2021 Apr 5, 2021 Jun 26, 2021 Sep 17, 20... Dec ...

SEE MORE

## Realtime

Updating live

271,552

Subscribers

SEE LIVE COUNT

3,731

Views · Last 48 hours



-48h

Top videos

Our Trip To Okl... 50

Telling my frien... 38

Connor Cain - ... 37

SEE MORE

EXHIBIT "4C"





# Channel analytics

ADVANCED MODE

Overview

Reach

Engagement

Audience

**Revenue**

Aug 1, 2020 – Dec 8, 2021

Custom

Your estimated revenue

\$39,687.51

RPM

\$3.20

Playback-based CPM

\$7.01

left squad  
June 21 2021



[SEE MORE](#)

# EXHIBIT "4D"



# Channel analytics

ADVANCED MODE

Aug 20, 2020 – Jun 21, 2021

Custom

Overview

Reach

Engagement

Audience

Revenue

## In the selected period, your channel got 11,235,526 views

Views

11.2M

Watch time (hours)

1.0M

Subscribers ▲

+271.4K

Your estimated revenue

\$35,343.38



Aug ... Oct 10, 20... Nov 30, 2020 Jan 20, 2021 Mar 11, 2021 May 1, 2021 Jun ...

SEE MORE

### Realtime

Updating live

271,529

Subscribers

SEE LIVE COUNT

3,757

Views - Last 48 hours



Top videos



Our Trip To Okl...

View



Telling my frien...



Connor Cain - ...

SEE MORE

EXHIBIT "4E"



# Channel analytics

ADVANCED MODE

Jun 22 - Dec 8, 2021

Custom

Overview

Reach

Engagement

Audience

**Revenue**

Your estimated revenue ⓘ

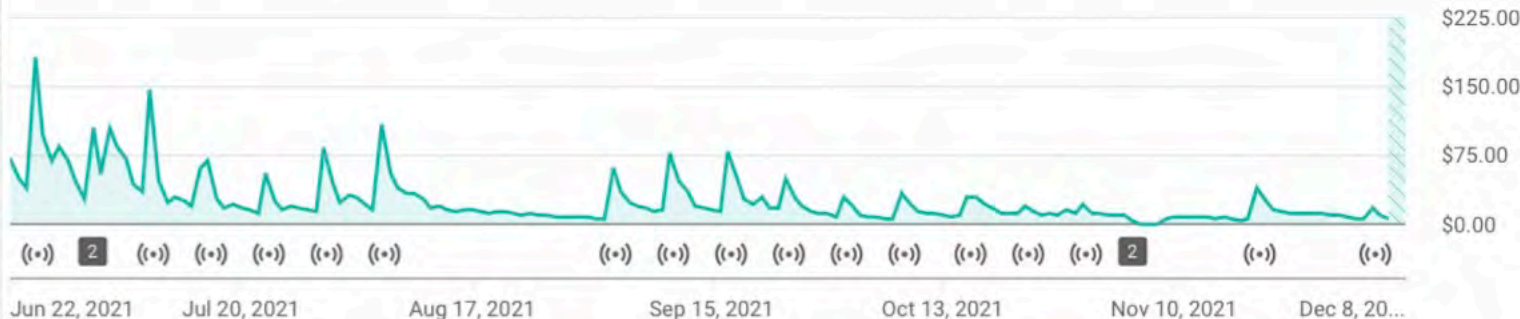
**\$4,344.13**

RPM ⓘ

**\$3.76**

Playback-based CPM ⓘ

**\$7.04**



SEE MORE

# EXHIBIT "4F"



Chaniel

Connor Cain

COMPARE TO...

Aug 11, 2020 - Dec 10, 2021

Custom

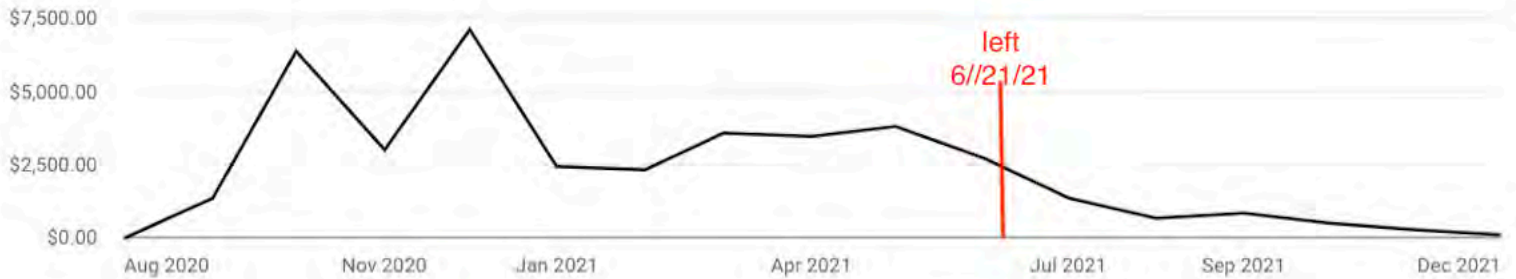
Filter

Video Traffic source Geography Viewer age Viewer gender Date More

Your estimated revenue by Date

Select secondary metric

Monthly



Date ↓	Your estimated revenue	Your estimated ad revenue	Estimated monetized playbacks	Playback based CP
<b>Total</b>	<b>\$39,707.81</b>	<b>\$39,050.55</b>	<b>10,145,897</b>	<b>\$7.0</b>
September	\$1,357.48 3.4%	\$1,350.68 3.5%	390,563 3.9%	\$6.2
October	\$6,388.63 16.1%	\$6,357.98 16.3%	1,385,288 13.7%	\$8.3
November	\$2,974.35 7.5%	\$2,956.32 7.6%	650,504 6.4%	\$8.2
December	\$7,089.82 17.9%	\$7,055.82 18.1%	1,483,492 14.6%	\$8.6
January	\$2,412.72 6.1%	\$2,231.91 5.7%	777,519 7.7%	\$5.2
February	\$2,298.11 5.8%	\$2,275.53 5.8%	818,131 8.1%	\$5.0
March	\$3,549.23 8.9%	\$3,519.34 9.0%	1,083,060 10.7%	\$5.9
April	\$3,458.30 8.7%	\$3,402.96 8.7%	991,350 9.8%	\$6.3
May	\$3,788.24 9.5%	\$3,698.22 9.5%	995,582 9.8%	\$6.7
<del>June</del> <b>left June 21 2021</b>	<del>\$2,732.94 6.9%</del>	<del>\$2,704.13 6.9%</del>	<del>666,682 6.6%</del>	<del>\$7.3</del>
July	\$1,356.42 3.4%	\$1,243.75 3.2%	370,154 3.7%	\$6.1
August	\$659.88 1.7%	\$652.30 1.7%	184,725 1.8%	\$6.4
September	\$810.51 2.0%	\$793.58 2.0%	168,674 1.7%	\$8.5
October	\$467.51 1.2%	\$452.87 1.2%	107,555 1.1%	\$7.6
November	\$290.51 0.7%	\$283.82 0.7%	57,163 0.6%	\$9.0
December (ongoing)	\$73.16 0.2%	\$71.37 0.2%	15,455 0.2%	\$9.1

EXHIBIT "5A"





Your channel  
Hayden Haas Vlogs



Dashboard



Content



Playlists



Analytics



Comments



Subtitles



Copyright



Monetization



Settings

# Channel analytics

ADVANCED MODE

Jan 1, 2020 - Dec 10, 2021

Custom

Overview

Reach

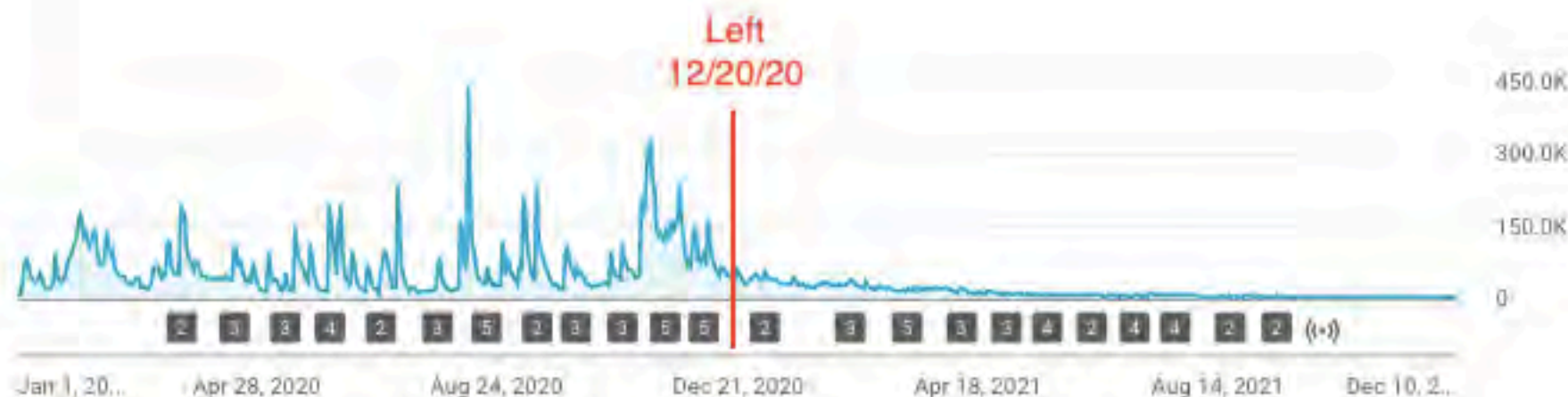
Engagement

Audience

Revenue

## In the selected period, your channel got 29,262,356 views

Views	Watch time (hours)	Subscribers	Your estimated revenue
29.3M	2.7M	+465.5K	\$77,218.52



[SEE MORE](#)

### Realtime

Updating live

512,361

Subscribers

[SEE LIVE COUNT](#)

5,880

Views - Last 48 hours



Top videos

Views

- Summer CRUSH \*\*DO WE... 1,604
- We Played AMONG US But I... 522
- Kids Valentine's Day \*Super... 386

EXHIBIT "5B"



Your channel

Hayden Haas Vlogs

Dashboard

Content

Playlists

Analytics

Comments

Subtitles

Copyright

Overview

Reach

Engagement

Audience

Revenue

# In the selected period, your channel got 29,257,108 views

Views <b>29.3M</b>	Watch time (hours) <b>2.7M</b>	Subscribers ▲ <b>+465.5K</b>	Your estimated revenue 🕒 <b>\$77,193.78</b>
-----------------------	-----------------------------------	---------------------------------	--

Hayden averaged 37.5K subscribers each month before leaving

Thu, Apr 23, 2020  
**1,014**

Left Piper Rockelle on December 20th, 2020

Hayden gets less than 1K subscribers each month (& often goes negative) after leaving

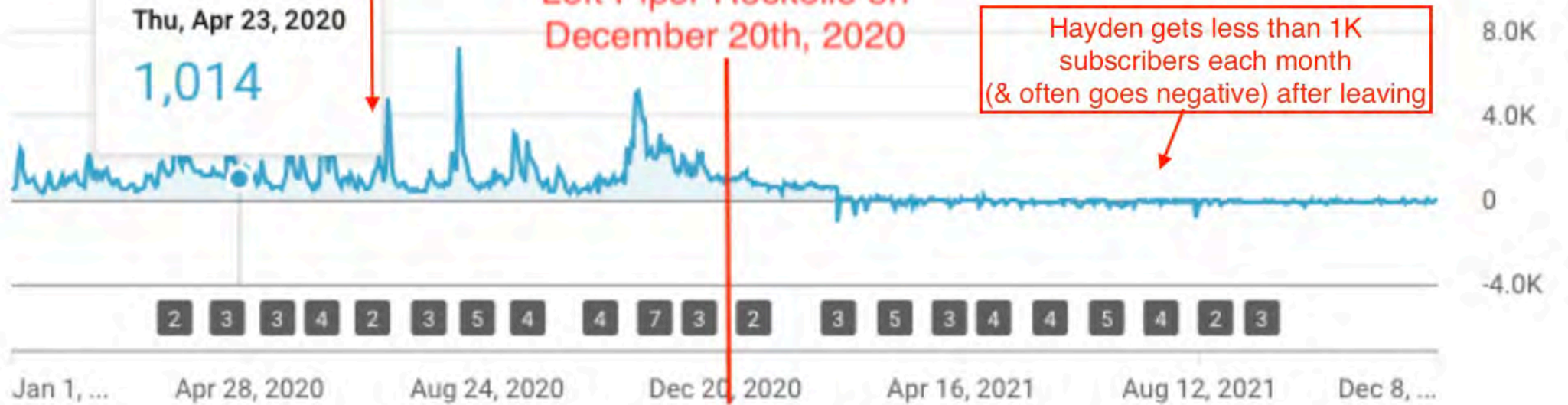


EXHIBIT "5C"



Your channel

Hayden Haas Vlogs



Dashboard



Content



Playlists



Analytics



Comments



Subtitles



Copyright



Monetization



Customization

# Channel analytics

ADVANCED MODE

Jan 1, 2020 - Dec 10, 2021

Custom

Overview

Reach

Engagement

Audience

Revenue

## In the selected period, your channel got 29,262,356 views

Views  
29.3M

Watch time (hours)  
2.7M

Subscribers ▲  
+465.5K

Your estimated revenue ⌚  
\$77,218.52



SEE MORE

### Realtime

Updating live

512,361

Subscribers

SEE LIVE COUNT

5,877

Views - Last 48 hours



Top videos

Views

- Summer CRUSH \*\*DO WE... 1,603
- We Played AMONG US But I... 522
- Kids Valentine's Day \*Super... 386

EXHIBIT "5D"



Your channel

Hayden Haas Vlogs

Dashboard

Content

Playlists

Analytics

Comments

Subtitles

Copyright

Monetization

# Channel analytics

Overview

Reach

Engagement

Audience

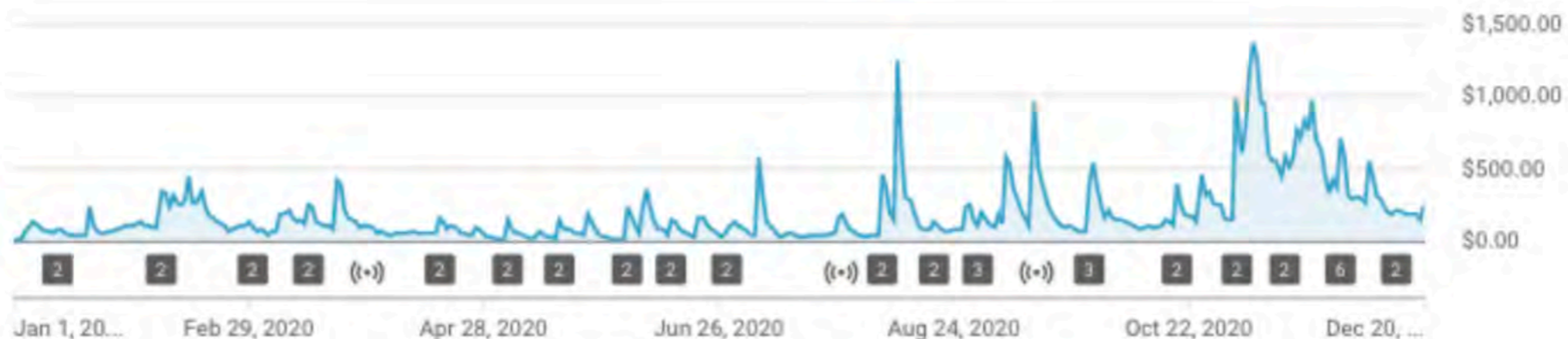
Revenue

Jan 1 – Dec 20, 2020

Custom

## In the selected period, your channel got 24,629,905 views

Views <b>24.6M</b>	Watch time (hours) <b>2.4M</b>	Subscribers <b>+450.2K</b>	Your estimated revenue <b>\$66,597.56</b>
-----------------------	-----------------------------------	-------------------------------	--



### Realtime

Updating live

**512,434**

Subscribers

[SEE LIVE COUNT](#)

**4,969**

Views - Last 48 hours



-48h

Top videos



Summer CRUSH \*\*



We Played AMONG

EXHIBIT "5E"





Your channel

Hayden Haas Vlogs



Dashboard



Content



Playlists



Analytics



Comments



Subtitles



Copyright



Monetization

# Channel analytics

ADVANCED MODE

Dec 20, 2020 – Dec 8, 2021

Custom

Overview

Reach

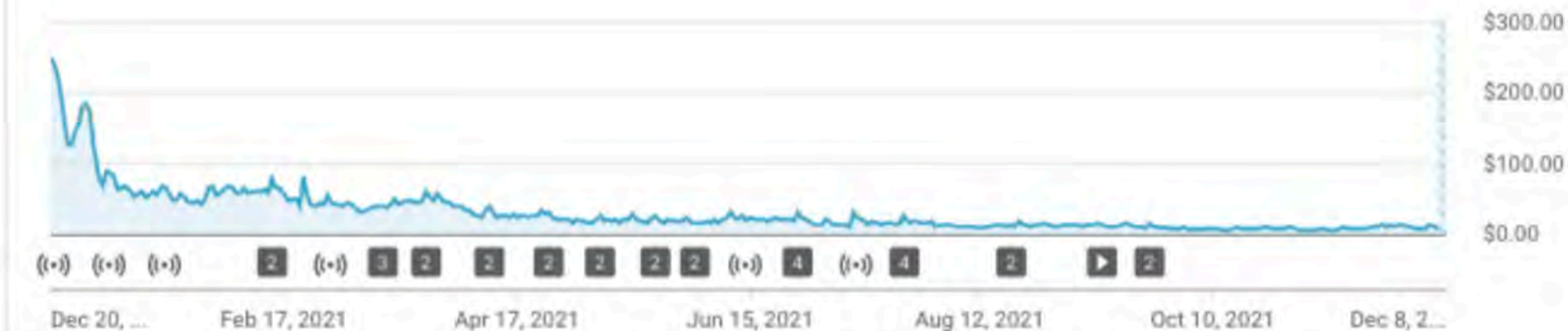
Engagement

Audience

Revenue

## In the selected period, your channel got 4,686,155 views

Views <b>4.7M</b>	Watch time (hours) <b>317.4K</b>	Subscribers ▲ <b>+16.0K</b>	Your estimated revenue ⓘ <b>\$10,846.79</b>
----------------------	-------------------------------------	--------------------------------	--



### Realtime

Updating live

**512,434**

Subscribers

[SEE LIVE COUNT](#)

**4,974**

Views · Last 48 hours



Top videos

- Summer CRUSH \*\*DO WE... 1,16
- We Played AMONG US But I... 42

EXHIBIT "5F"



Channel

Hayden Haas Vlogs

COMPARE TO...

Jan 1, 2020 - Dec 10, 2021

Custom

Filter

Video Traffic source Geography Viewer age Viewer gender Date Revenue source Subscription status Subscription source Playlist Device type Ad type More

Date ↓	Views	Watch time (hours)	Average view duration	Your estimated revenue
<b>Total</b>	<b>29,262,356</b>	<b>2,733,152.3</b>	<b>5:36</b>	<b>\$77,218.52</b>
December (ongoing)	26,111 0.1%	1,522.5 0.1%	3:29	\$80.12 0.1%
November	81,630 0.3%	4,805.2 0.2%	3:31	\$270.16 0.4%
October	91,632 0.3%	5,249.0 0.2%	3:26	\$243.60 0.3%
September	131,981 0.5%	7,052.2 0.3%	3:12	\$346.75 0.5%
August	177,132 0.6%	9,013.8 0.3%	3:03	\$376.11 0.5%
July	224,273 0.8%	11,863.1 0.4%	3:10	\$515.64 0.7%
June	208,849 0.7%	10,951.2 0.4%	3:08	\$630.41 0.8%
May	278,572 1.0%	14,670.4 0.5%	3:09	\$603.13 0.8%
April	451,303 1.5%	24,456.6 0.9%	3:15	\$855.45 1.1%
March	619,939 2.1%	38,693.3 1.4%	3:44	\$1,347.14 1.7%
February	803,139 2.7%	56,990.2 2.1%	4:15	\$1,614.92 2.1%
January	1,065,168 3.6%	84,177.1 2.1%	4:44	\$1,871.87 2.4%
December	1,910,459 6.5%	174,415.5 6.4%	5:28	\$7,116.31 9.2%
November	4,745,199 16.2%	510,211.9 18.7%	6:27	\$20,349.06 26.4%
October	1,511,108 5.2%	142,311.0 5.2%	5:39	\$5,572.54 7.2%
September	2,225,160 7.6%	203,247.8 7.4%	5:28	\$7,753.61 10.0%
August	2,352,297 8.0%	239,373.9 8.8%	6:06	\$5,967.93 7.7%
July	1,347,901 4.6%	122,501.6 4.5%	5:27	\$2,819.83 3.7%
June	1,901,583 6.5%	199,176.2 7.3%	6:17	\$3,232.16 4.2%
May	1,405,015 4.8%	147,287.2 5.4%	6:17	\$1,719.02 2.2%
April	1,462,256 5.0%	130,390.8 4.8%	5:21	\$1,849.36 2.4%
March	2,065,797 7.1%	230,949.6 8.5%	6:42	\$4,454.16 5.8%
February	2,495,817 8.5%	234,134.3 8.6%	5:37	\$5,447.08 7.0%
January	1,680,035 5.7%	129,708.0 4.8%	4:37	\$2,182.16 2.8%

present 2021

Left Dec 20 2020

EXHIBIT "6A"



Your channel

Walker Bryant

# Channel analytics

ADVANCED MODE

Nov 16, 2019 – Dec 8, 2021

Custom

Overview

Reach

Engagement

Audience

Revenue

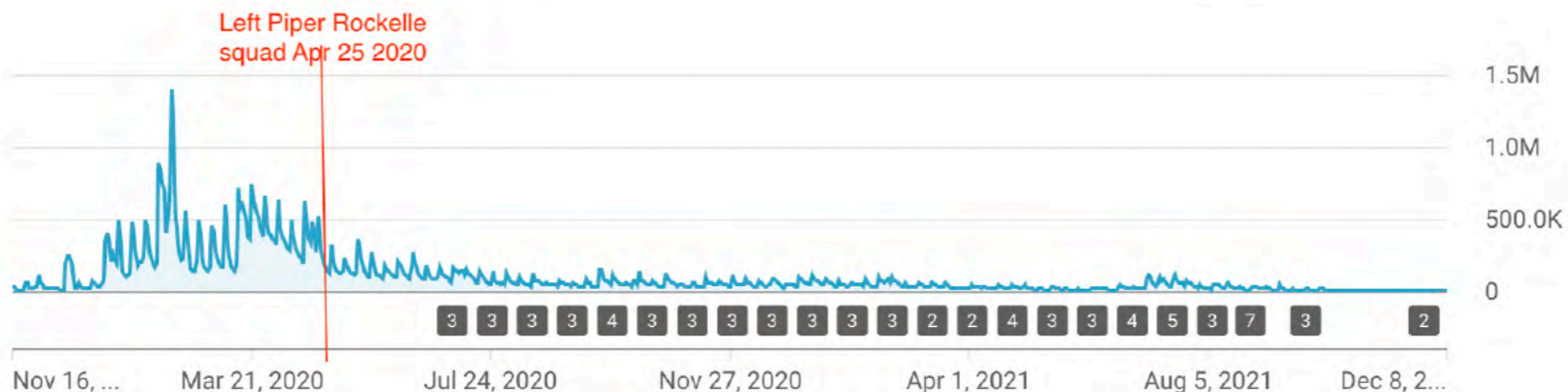
## In the selected period, your channel got 80,551,518 views

Views  
80.6M

Watch time (hours)  
10.9M

Subscribers ▲  
+874.0K

Your estimated revenue 🕒  
\$237,965.58



SEE MORE

### Realtime

● Updating live

899,765

Subscribers

SEE LIVE COUNT

21,563

Views · Last 48 hours



### Top videos

Views

- LAST TO Leave The Self ... 3,009
- I Got Married To My CRUS... 2,305
- BTS Photo Shoot \*Beverly... 1,747

SEE MORE

Dashboard

Content

Playlists

Analytics

Comments

Subtitles

Copyright

Monetization

Customization

Audio library

EXHIBIT "6B"



# Channel analytics

ADVANCED MODE

Nov 16, 2019 – Dec 8, 2021

Custom

Overview

Reach

Engagement

Audience

Revenue

Your channel

Walker Bryant

## In the selected period, your channel got 80,551,518 views

Views  
80.6M

Watch time (hours)  
10.9M

Subscribers ▲  
+874.0K

Your estimated revenue 🕒  
\$237,965.58



Walker averaged 139K subscribers per month while in squad

Walker averages 9k subscribers/mo after leaving squad

### Realtime

● Updating live

899,766

Subscribers

[SEE LIVE COUNT](#)

21,564

Views · Last 48 hours



Top videos

Views

- LAST TO Leave The Self ... 3,009
- I Got Married To My CRUS... 2,304
- BTS Photo Shoot \*Beverly... 1,747

[SEE MORE](#)

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Copyright
- Monetization
- Customization
- Audio library

EXHIBIT "6C"





Your channel

Walker Bryant

# Channel analytics

ADVANCED MODE

Nov 16, 2019 – Dec 8, 2021

Custom

Overview

Reach

Engagement

Audience

Revenue

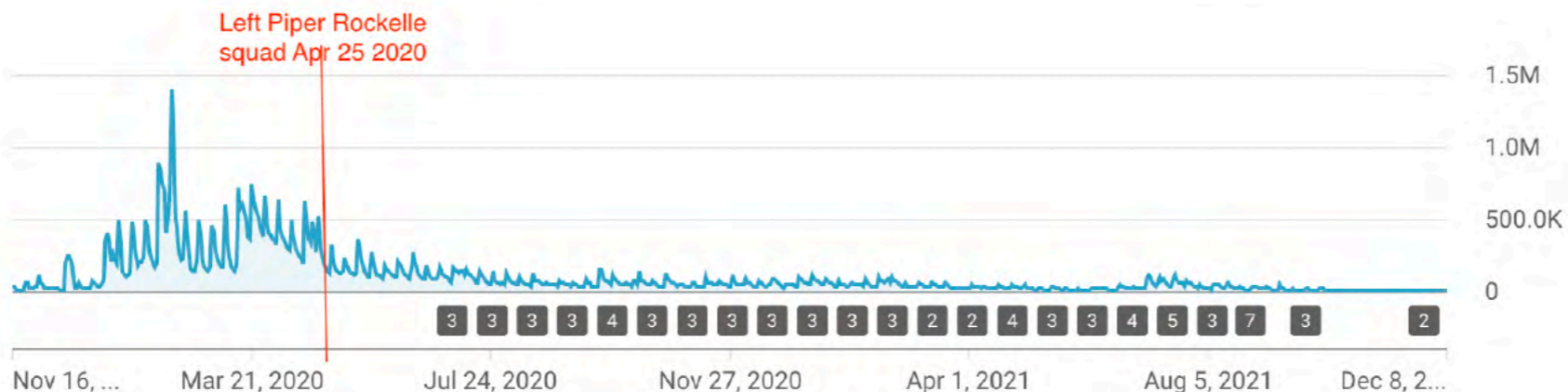
## In the selected period, your channel got 80,551,518 views

Views  
80.6M

Watch time (hours)  
10.9M

Subscribers ▲  
+874.0K

Your estimated revenue 🕒  
\$237,965.58



SEE MORE

### Realtime

● Updating live

899,765

Subscribers

SEE LIVE COUNT

21,563

Views · Last 48 hours



### Top videos

Views

- LAST TO Leave The Self ... 3,009
- I Got Married To My CRUS... 2,305
- BTS Photo Shoot \*Beverly... 1,747

SEE MORE

Dashboard

Content

Playlists

Analytics

Comments

Subtitles

Copyright

Monetization

Customization

Audio library

EXHIBIT "6D"



# Channel analytics

ADVANCED MODE

Nov 16, 2019 – Apr 25, 2020

Custom

Overview

Reach

Engagement

Audience

Revenue

Your channel

Walker Bryant

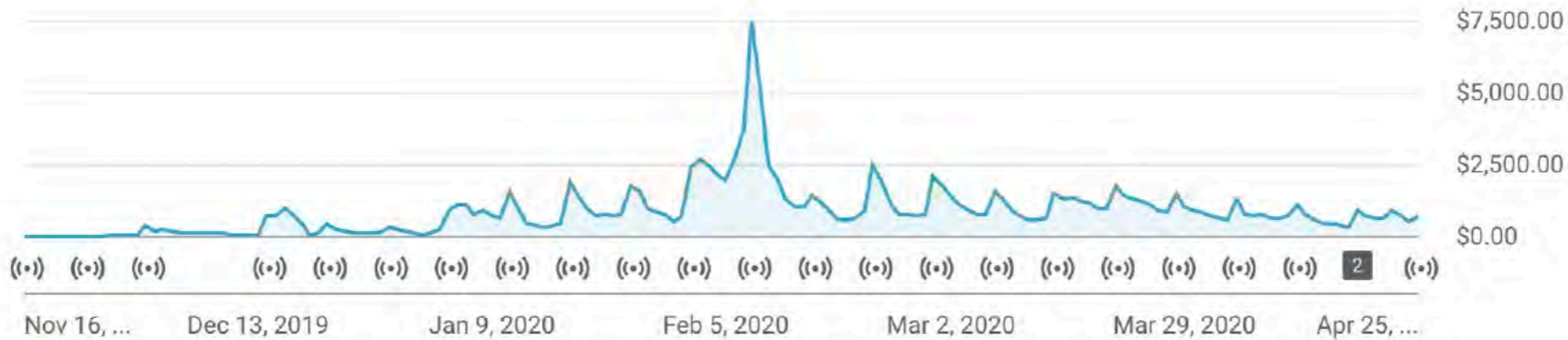
## In the selected period, your channel got 45,638,486 views

Views  
45.6M

Watch time (hours)  
7.1M

Subscribers  
+695.1K

Your estimated revenue  
\$142,174.20



[SEE MORE](#)

### Realtime

Updating live

899,759

Subscribers

[SEE LIVE COUNT](#)

20,695

Views · Last 48 hours



### Top videos

Video	Views
LAST TO Leave The Self ...	3,015
I Got Married To My CRUS...	2,126
BTS Photo Shoot *Beverly...	1,541

Dashboard

Content

Playlists

Analytics

Comments

Subtitles

Copyright

Monetization

Customization

Accessibility

EXHIBIT "6E"



# Channel analytics

ADVANCED MODE

Overview

Reach

Engagement

Audience

Revenue

\$96K over 20 month period after leaving vs \$142K over 5 month period before leaving Piper  
15M views/mo down to 1M views/mo

Apr 25, 2020 – Dec 8, 2021

Custom

Your channel

Walker Bryant

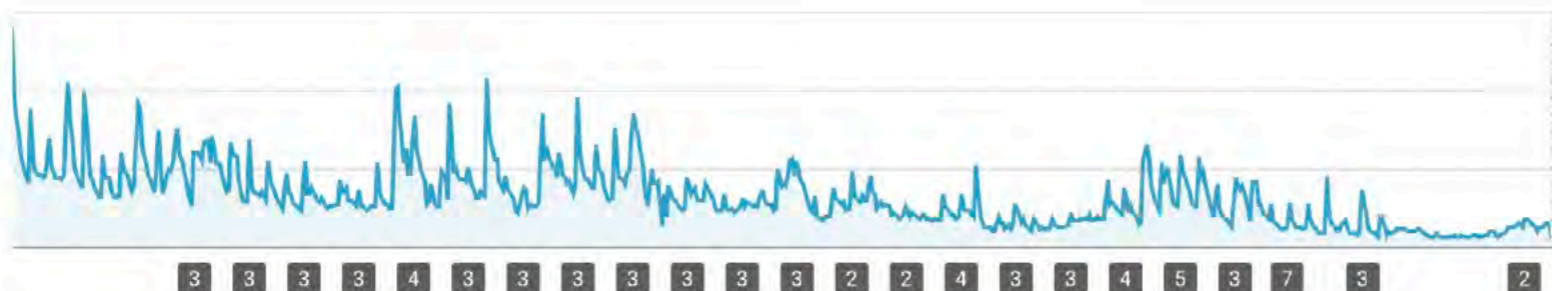
## In the selected period, your channel got 35,443,382 views

Views  
35.4M

Watch time (hours)  
3.8M

Subscribers ▲  
+184.2K

Your estimated revenue 🕒  
\$96,497.39



Apr 25, ... Aug 2, 2020 Nov 8, 2020 Feb 15, 2021 May 25, 2021 Aug 31, 2021 Dec 8, 2...

SEE MORE

### Realtime

Updating live

899,759

Subscribers

SEE LIVE COUNT

20,706

Views · Last 48 hours



-48h

Now

Top videos

Views



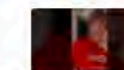
LAST TO Leave The Self ...

3,017



I Got Married To My CRUS...

2,128



BTS Photo Shoot \*Beverly...

1,542



Dashboard



Content



Playlists



Analytics



Comments



Subtitles



Copyright



Monetization



Customization

EXHIBIT "6F"



Channel

Walker Bryant

COMPARE TO...

Nov 16, 2019 - Dec 8, 2021

Custom

Filter

Video Traffic source Geography Viewer age Viewer gender Date Revenue source Subscription status Subscription source Playlist Device type Ad type More

Date ↓	Views	Watch time (hours)	Average view duration	Your estimated revenue
<b>Total</b>	<b>80,551,518</b>	<b>10,868,983.0</b>	<b>8:05</b>	<b>\$237,965.58</b>
December (ongoing)	106,315 0.1%	16,795.2 0.2%	9:28	\$411.08 0.2%
November	318,992 0.4%	65,860.2 0.6%	12:23	\$1,595.30 0.7%
October	403,759 0.5%	56,386.0 0.5%	8:22	\$1,481.17 0.6%
September	606,588 0.8%	61,433.2 0.6%	6:04	\$2,274.10 1.0%
August	1,038,292 1.3%	105,030.8 1.0%	6:04	\$3,625.92 1.5%
July	2,013,813 2.5%	153,404.2 1.4%	4:34	\$5,934.24 2.5%
June	719,649 0.9%	66,995.7 0.6%	5:35	\$3,184.65 1.3%
May	684,224 0.9%	64,559.5 0.6%	5:39	\$2,326.09 1.0%
April	1,031,238 1.3%	112,794.8 1.0%	6:33	\$3,414.62 1.4%
March	1,214,891 1.5%	123,412.3 1.1%	6:05	\$4,373.80 1.8%
February	1,732,544 2.2%	162,830.5 1.5%	5:38	\$4,900.88 2.1%
January	2,042,033 2.5%	206,062.2 1.9%	6:03	\$4,614.31 1.9%
December	1,693,065 2.1%	165,965.8 1.5%	5:52	\$7,218.62 3.0%
November	1,676,688 2.1%	169,406.5 1.6%	6:03	\$6,555.49 2.8%
October	1,999,951 2.5%	206,243.0 1.9%	6:11	\$7,111.76 3.0%
September	2,014,551 2.5%	213,096.4 2.0%	6:20	\$6,624.72 2.8%
August	2,126,625 2.6%	222,913.7 2.1%	6:17	\$5,185.99 2.2%
July	3,165,327 3.9%	380,493.3 3.5%	7:12	\$7,326.61 3.1%
June	3,953,253 4.9%	484,375.1 4.5%	7:21	\$7,631.46 3.2%
May	5,250,322 6.5%	597,858.5 5.5%	6:49	\$8,327.40 3.5%
April	10,595,356 13.2%	1,591,575.1 14.6%	9:00	\$19,252.01 8.1%
March	12,897,123 16.0%	2,270,432.1 20.9%	10:33	\$34,612.75 14.6%
February	13,158,865 16.3%	2,161,581.2 19.9%	9:51	\$55,517.36 23.3%
January	7,628,621 9.5%	942,719.9 8.5%	7:24	\$25,897.91 10.9%

Left Piper Rockelle squad  
Apr 25 2020

Screenshot

EXHIBIT "7-A"





Your channel  
Sophie Fergi

# Channel analytics

ADVANCED MODE

Oct 9, 2018 – Dec 9, 2021

Lifetime

Overview

Reach

Engagement

Audience

Revenue

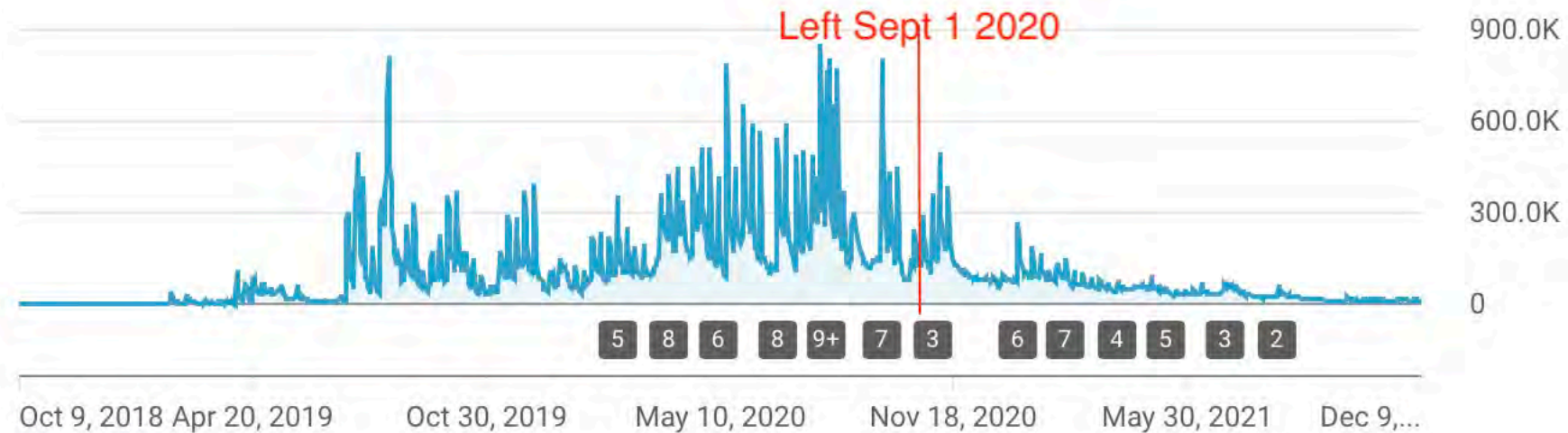
## Your channel has gotten 117,899,586 views so far

Views ▲  
**117.9M**

Watch time (hours) ▲  
**10.9M**

Subscribers ▲  
**+1.6M**

Your estimated revenue 🕒  
**\$173,595.56**



[SEE MORE](#)

### Realtime

● Updating live

**1,614,190**

Subscribers

[SEE LIVE COUNT](#)

**21,375**

Views · Last 48 hours



Top videos

Views

- THE TRUTH ABOU... 4,024
- SAYING GOODBYE ... 2,497
- Recreating VIRAL C... 2,018

[SEE MORE](#)

Dashboard

Content

Playlists

**Analytics**

Comments

Subtitles

Copyright

Monetization

Settings

Send feedback

EXHIBIT "7B"



Your channel  
Sophie Fergi

May 1, 2020 – Dec 9, 2021

Custom

Overview

Reach

Engagement

Audience

Revenue

Views  
68.8M

Watch time (hours)  
6.2M

Subscribers ▲  
+664.0K

Your estimated revenue 🕒  
\$173,577.40

Gained avg. 104K subscribers each month before leaving squad

left Sept 1 2020

Gained avg of 16k subscribers / mo after leaving



SEE MORE

1,614,203

Subscribers

SEE LIVE COUNT

21,955

Views - Last 48 hours



Top videos

Views

	THE TRUTH ABOUT MY B...	4,174
	SAYING GOODBYE TO MY...	2,578
	Recreating VIRAL Couple...	2,064

SEE MORE

Dashboard

Content

Playlists

Analytics

Comments

Subtitles

Copyright

EXHIBIT "7C"



Your channel  
Sophie Fergi



Dashboard



Content



Playlists



Analytics



Comments



Subtitles



Copyright

Overview

Reach

Engagement

Audience

Revenue

May 1, 2020 – Dec 9, 2021

Custom

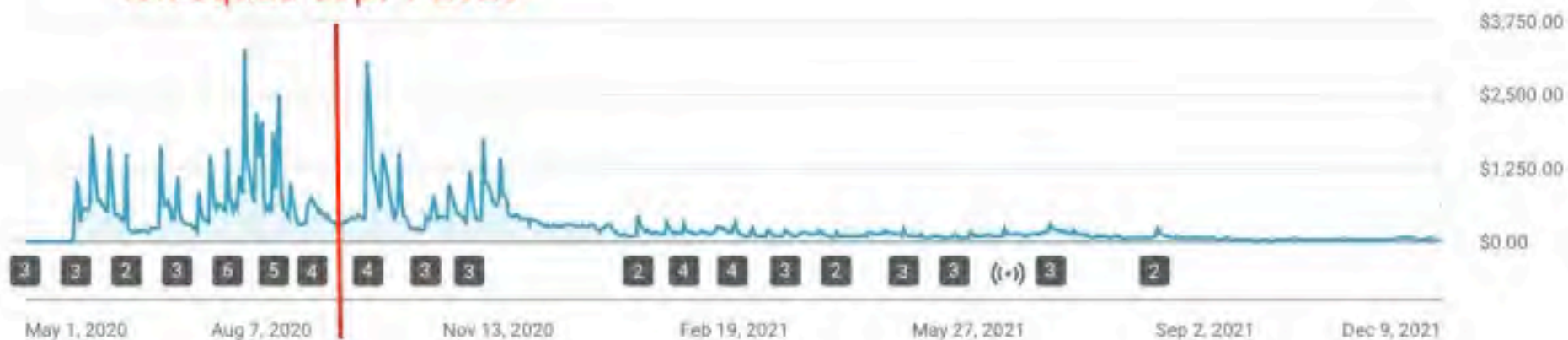
Views  
68.8M

Watch time (hours)  
6.2M

Subscribers ▲  
+664.0K

Your estimated revenue 🕒  
\$173,577.40

left squad sept 1 2020



SEE MORE

1,614,203

Subscribers

SEE LIVE COUNT

21,955

Views - Last 48 hours



-48h

Now

Top videos

Views



THE TRUTH ABOUT MY B...

4,174



SAYING GOODBYE TO MY...

2,578



Recreating VIRAL Couple...

2,064

SEE MORE

EXHIBIT "7D"



Your channel  
Sophie Fergi



Dashboard



Content



Playlists



Analytics



Comments



Subtitles



Copyright

Overview

Reach

Engagement

Audience

Revenue

May 1 - Sep 1, 2020

Custom

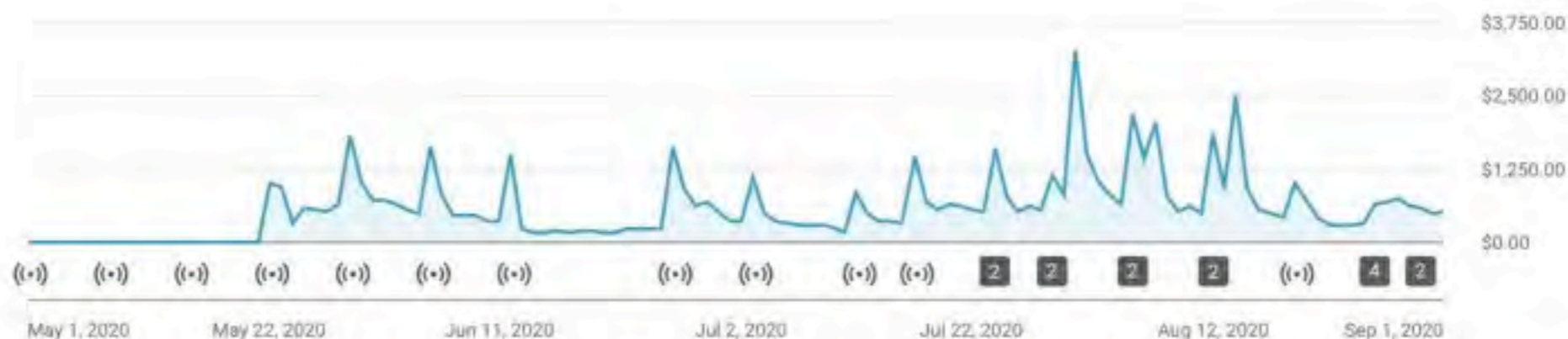
Before leaving \$72K in 4 months = \$18k/mo

Views  
35.1M

Watch time (hours)  
3.5M

Subscribers  
+419.6K

Your estimated revenue  
\$72,578.19



SEE MORE

1,614,205

Subscribers

SEE LIVE COUNT

22,043

Views - Last 48 hours



Top videos

Views



THE TRUTH ABOUT MY B... 4,191



SAYING GOODBYE TO MY... 2,580



Recreating VIRAL Couple... 2,070

EXHIBIT "7E"





Your channel  
Sophie Fergi

Sep 1, 2020 - Dec 9, 2021

Custom

Overview

Reach

Engagement

Audience

Revenue

**\$101K over 15 mo period = \$6.7K/mo after leaving squad vs \$18k/mo before leaving**

Views  
**34.0M**

Watch time (hours)  
**2.8M**

Subscribers ▲  
**+245.9K**

Your estimated revenue ⓘ  
**\$101,515.00**

**1,614,205**  
Subscribers

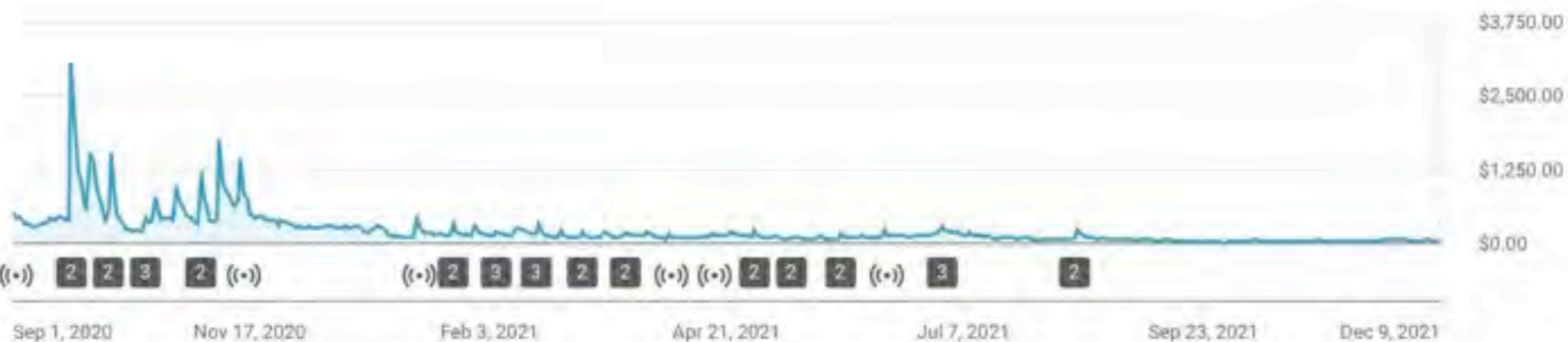
[SEE LIVE COUNT](#)

**22,070**  
Views - Last 48 hours



Top videos Views

- THE TRUTH ABOUT MY B... 4,199
- SAYING GOODBYE TO MY... 2,583
- Recreating VIRAL Couple... 2,072



[SEE MORE](#)

Dashboard

Content

Playlists

Analytics

Comments

Subtitles

Copyright

EXHIBIT "7F"



Channel

Sophie Fergi



COMPARE TO...

Filter

May 1, 2020 – Dec 9, 2021

Custom

Video Traffic source Geography Viewer age Viewer gender Date Revenue source Subscription status Subscription source Playlist More

Date ↓	Views		Watch time (hours)		Average view duration	Your estimated revenue	
<b>Total</b>	<b>68,823,405</b>		<b>6,249,630.0</b>		<b>5:26</b>	<b>\$173,577.40</b>	
December (ongoing)	99,457	0.1%	6,951.2	0.1%	4:11	\$417.72	0.2%
November	339,939	0.5%	23,804.9	0.4%	4:12	\$1,534.21	0.9%
October	385,286	0.6%	26,370.1	0.4%	4:06	\$1,396.90	0.8%
September	410,208	0.6%	28,264.0	0.5%	4:08	\$1,397.33	0.8%
August	838,808	1.2%	59,646.7	1.0%	4:15	\$2,829.13	1.6%
July	1,185,990	1.7%	95,684.5	1.5%	4:50	\$3,939.19	2.3%
June	1,117,215	1.6%	86,900.9	1.4%	4:40	\$4,229.46	2.4%
May	1,220,271	1.8%	87,802.1	1.4%	4:19	\$3,116.39	1.8%
April	1,587,509	2.3%	120,106.1	1.9%	4:32	\$4,080.88	2.4%
March	1,852,785	2.7%	138,772.4	2.2%	4:29	\$4,084.91	2.4%
February	2,508,687	3.7%	199,392.9	3.2%	4:46	\$4,953.16	2.9%
January	3,386,099	4.9%	279,750.5	4.5%	4:57	\$5,483.34	3.2%
December	2,451,938	3.6%	216,591.7	3.5%	5:18	\$8,455.34	4.9%
November	5,407,339	7.9%	496,601.1	8.0%	5:30	\$19,149.89	11.0%
October	4,649,851	6.8%	379,557.3	6.1%	4:53	\$14,976.08	8.6%
September	6,525,470	9.5%	526,200.5	8.4%	4:50	\$21,471.06	12.4%
August	10,405,979	15.1%	850,740.2	13.6%	4:54	\$27,076.75	15.6%
July	9,032,727	13.1%	974,278.3	15.6%	6:28	\$21,220.57	12.2%
June	7,007,094	10.2%	780,743.4	12.5%	6:41	\$15,619.83	9.0%
May	8,410,753	12.2%	871,471.2	13.9%	6:13	\$8,145.25	4.7%

Left Sept 1 2021  
however, prior to leaving, ads on Sophie's best videos would be turned off, she wouldn't be allowed to post, videos were embedded into porn sites, etc

EXHIBIT "8A"



Your channel  
Symonne Harrison

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Settings
- Send feedback

# Channel analytics

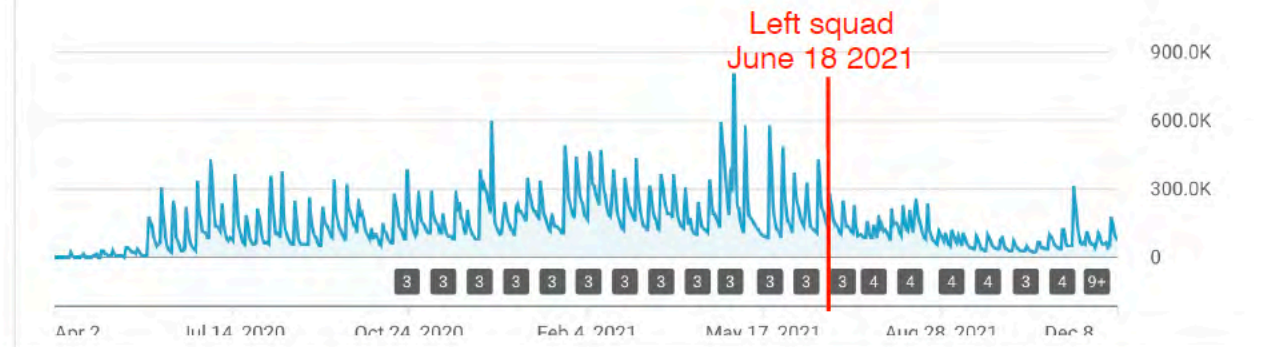
ADVANCED MODE

- Overview**
- Reach
- Engagement
- Audience
- Revenue

Apr 2, 2020 – Dec 8, 2021  
Custom

## In the selected period, your channel got 86,339,839 views

Views <b>86.3M</b>	Watch time (hours) <b>10.2M</b>	Subscribers ▲ <b>+1.1M</b>	Your estimated revenue 🕒 <b>\$335,467.69</b>
-----------------------	------------------------------------	-------------------------------	---



### Realtime

Updating live

**1,156,964**

Subscribers

[SEE LIVE COUNT](#)

**141,043**

Views · Last 48 hours



### Top videos

- Justin Bieber - Mistletoe... 52,885
- Symonne Harrison, Nic... 16,578

EXHIBIT "8B"



Your channel  
Symonne Harrison

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Settings
- Send feedback

# Channel analytics

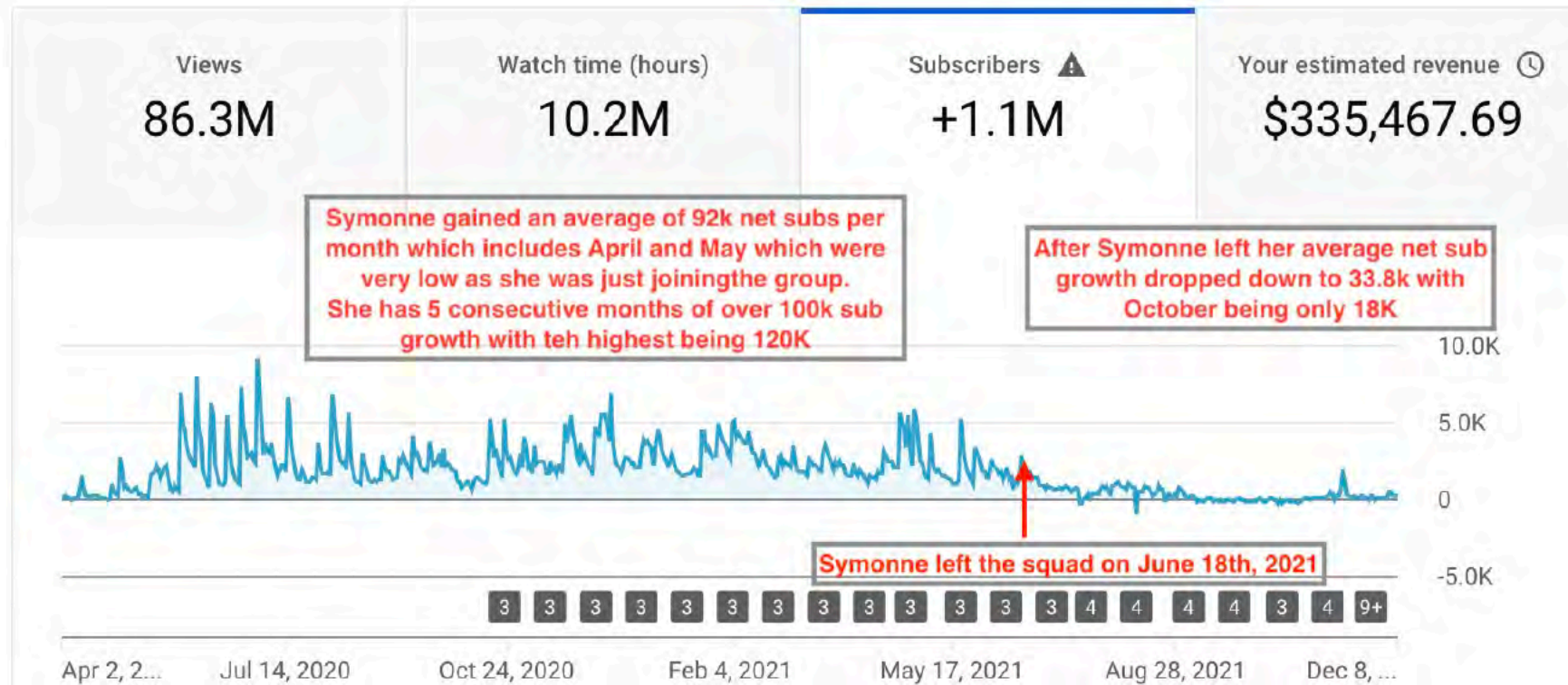
ADVANCED MODE

Overview Reach Engagement Audience Revenue

Apr 2, 2020 – Dec 8, 2021

Custom

## In the selected period, your channel got 86,339,839 views



### Realtime

Updating live

**1,156,954**

Subscribers

[SEE LIVE COUNT](#)

**142,578**

Views · Last 48 hours



Top videos

Views

- Justin Bieber - Mistletoe... 53,992
- Symonne Harrison, Nic... 16,878

[SEE MORE](#)

EXHIBIT "8C"





Your channel

Symonne Harrison



Dashboard



Content



Playlists



Analytics



Comments



Subtitles



Settings



Send feedback

# Channel analytics

ADVANCED MODE

Overview

Reach

Engagement

Audience

Revenue

Apr 2, 2020 – Dec 8, 2021

Custom

Your estimated revenue ⓘ

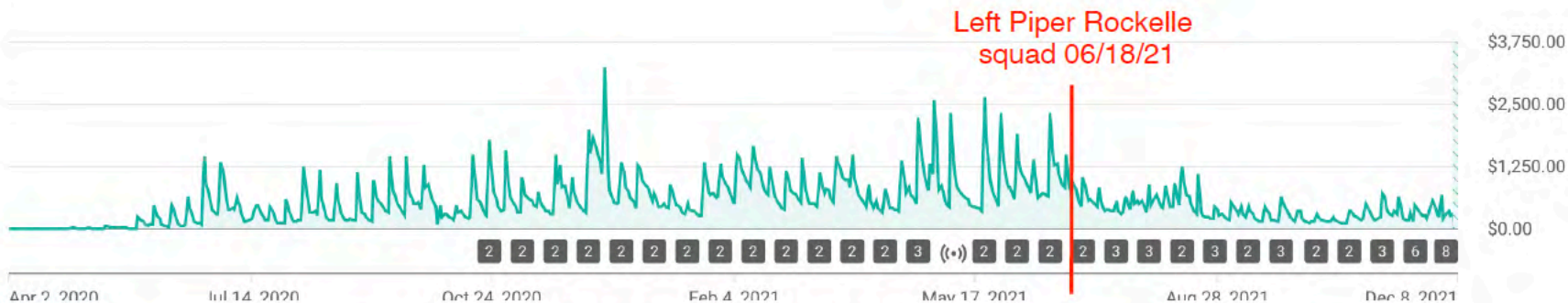
\$335,467.69

RPM ⓘ

\$3.89

Playback-based CPM

\$8.62



[SEE MORE](#)

EXHIBIT "8D"



### Your channel

Symonne Harrison

Dashboard

Content

Playlists

**Analytics**

Comments

Subtitles

Settings

Send feedback

# Channel analytics

ADVANCED MODE

Apr 2, 2020 – Jun 18, 2021

Custom

Overview

Reach

Engagement

Audience

**Revenue**

Your estimated revenue

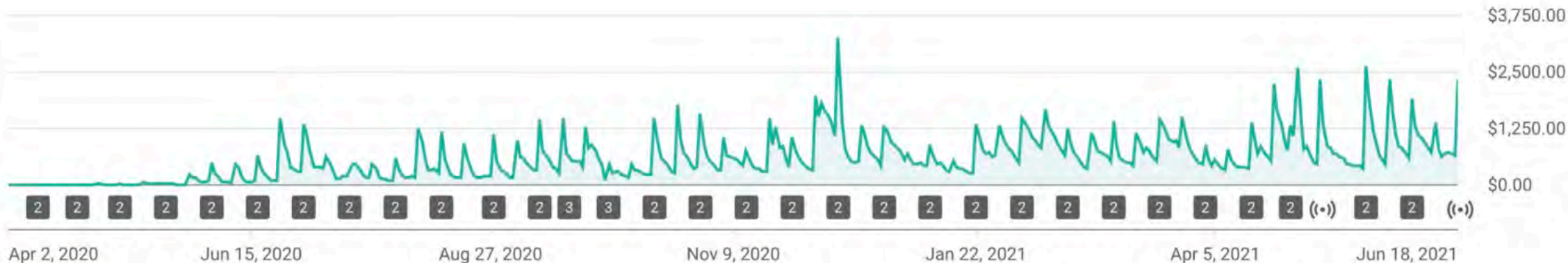
**\$262,976.03**

RPM

**\$3.76**

Playback-based CPM

**\$8.62**



[SEE MORE](#)

EXHIBIT "8E"



Your channel

Symonne Harrison

Dashboard

Content

Playlists

**Analytics**

Comments

Subtitles

Settings

Send feedback

## Channel analytics

ADVANCED MODE

Jun 19 – Dec 8, 2021

Custom

Overview

Reach

Engagement

Audience

**Revenue**

Your estimated revenue ⓘ

**\$72,491.65**

RPM ⓘ

**\$4.46**

Playback-based CPM

**\$8.61**



[SEE MORE](#)

certificate.png

EXHIBIT "8F"



Channel

Symonne Harrison

COMPARE TO...

Filter

Apr 2, 2020 – Dec 8, 2021

Custom

Video Traffic source Geography Viewer age Viewer gender Date Revenue source Subscription status Subscription source Playlist Device type Ad type More

Apr 2020

Jul 2020

Nov 2020

Feb 2021

May 2021

Sep 2021

Dec 2021

Date ↓	Views	Watch time (hours)	Average view duration	Your estimated revenue
<b>Total</b>	<b>86,339,807</b>	<b>10,194,483.9</b>	<b>7:05</b>	<b>\$335,845.33</b>
December (ongoing)	733,112 0.9%	38,972.8 0.4%	3:11	\$2,509.31 0.8%
November	2,424,464 2.8%	183,794.5 1.8%	4:32	\$10,077.59 3.0%
October	1,374,985 1.6%	128,133.6 1.3%	5:35	\$6,689.95 2.0%
September	1,854,238 2.2%	187,070.3 1.8%	6:03	\$9,106.24 2.7%
August	3,937,860 4.6%	424,025.7 4.2%	6:27	\$15,949.71 4.8%
July	3,981,509 4.6%	431,745.0 4.2%	6:30	\$16,198.15 4.8%
June	5,605,667 6.5%	638,092.3 6.3%	6:49	\$30,052.40 9.0%
May	6,459,788 7.5%	736,256.2 7.2%	6:50	\$29,553.51 8.8%
April	7,098,314 8.2%	838,150.7 8.2%	7:05	\$25,120.90 7.5%
March	6,579,065 7.6%	824,586.6 8.1%	7:31	\$25,832.57 7.7%
February	7,438,056 8.6%	970,843.4 9.5%	7:49	\$25,780.46 7.7%
January	6,958,180 8.1%	886,340.0 8.7%	7:38	\$18,799.38 5.6%
December	6,170,885 7.2%	809,168.1 7.9%	7:52	\$31,774.56 9.5%
November	4,433,798 5.1%	537,684.0 5.3%	7:16	\$18,910.34 5.6%
October	4,075,310 4.7%	438,280.6 4.3%	6:27	\$16,461.83 4.9%
September	4,567,595 5.3%	496,021.2 4.9%	6:30	\$18,243.11 5.4%
August	3,816,729 4.4%	507,824.3 5.0%	7:58	\$12,925.43 3.9%
July	4,488,196 5.2%	599,702.4 5.9%	8:01	\$11,596.91 3.5%
June	3,224,206 3.7%	405,690.0 4.0%	7:32	\$8,969.82 2.7%
May	958,019 1.1%	102,306.3 1.0%	6:24	\$1,190.34 0.4%
April	159,831 0.2%	9,796.0 0.1%	3:40	\$102.81 0.0%

EXHIBIT "9A"





Your channel  
Claire RockSmith

- Dashboard
- Content
- Playlists
- Analytics
- Comments
- Subtitles
- Copyright
- Monetization
- Customization
- Audio library
- Settings
- Send feedback

# Channel analytics

ADVANCED MODE

- Overview
- Reach
- Engagement
- Audience
- Revenue

Aug 4, 2020 - Dec 8, 2021  
Custom

## In the selected period, your channel got 60,336,587 views



Realtime  
Updating live

897,756  
Subscribers  
SEE LIVE COUNT

44,286  
Views Last 48 hours



- Top videos
- | Video Title              | Views |
|--------------------------|-------|
| RANDOMLY FALLING ASL...  | 6,992 |
| ANSWERING FAN QUESTI...  | 4,252 |
| WE FOUND A BODY IN TH... | 3,438 |

SEE MORE

### Your top videos in this period

Video	Average view duration	Views

### Latest videos



EXHIBIT "9B"



Your channel  
Claire RockSmith

# Channel analytics

ADVANCED MODE

- Overview
- Reach
- Engagement
- Audience
- Revenue

Aug 4, 2020 - Dec 8, 2021  
Custom

## In the selected period, your channel got 60,336,587 views



### Realtime

Updating live

897,756

Subscribers

SEE LIVE COUNT

44,331

Views · Last 48 hours



### Top videos

- RANDOMLY FALLING ASL... 6,996
- ANSWERING FAN QUESTI... 4,257
- WE FOUND A BODY IN TH... 3,441

SEE MORE

### Latest videos



- Dashboard
- Content
- Playlists
- Analytics
- Comments
- Subtitles
- Copyright
- Monetization
- Customization
- Audio library
- Settings
- Send feedback

### Your top videos in this period

Video | Average view duration | Views

EXHIBIT "9C"



Your channel  
Claire RockSmith

# Channel analytics

ADVANCED MODE

- Overview
- Reach
- Engagement
- Audience
- Revenue

Aug 4, 2020 – Dec 8, 2021  
Custom

## In the selected period, your channel got 60,336,587 views



### Realtime

Updating live

897,756

Subscribers

SEE LIVE COUNT

44,335

Views · Last 48 hours



### Top videos

- | Video                    | Views |
|--------------------------|-------|
| RANDOMLY FALLING ASL...  | 6,998 |
| ANSWERING FAN QUESTI...  | 4,257 |
| WE FOUND A BODY IN TH... | 3,441 |

SEE MORE

### Your top videos in this period

Video

Average view duration

Views

### Latest videos



Dashboard

Content

Playlists

Analytics

Comments

Subtitles

Copyright

Monetization

Customization

Audio library

Settings

Send feedback

EXHIBIT "9D"



Your channel  
Claire RockSmith

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Copyright
- Monetization
- Customization
- Audio library
- Settings
- Send feedback

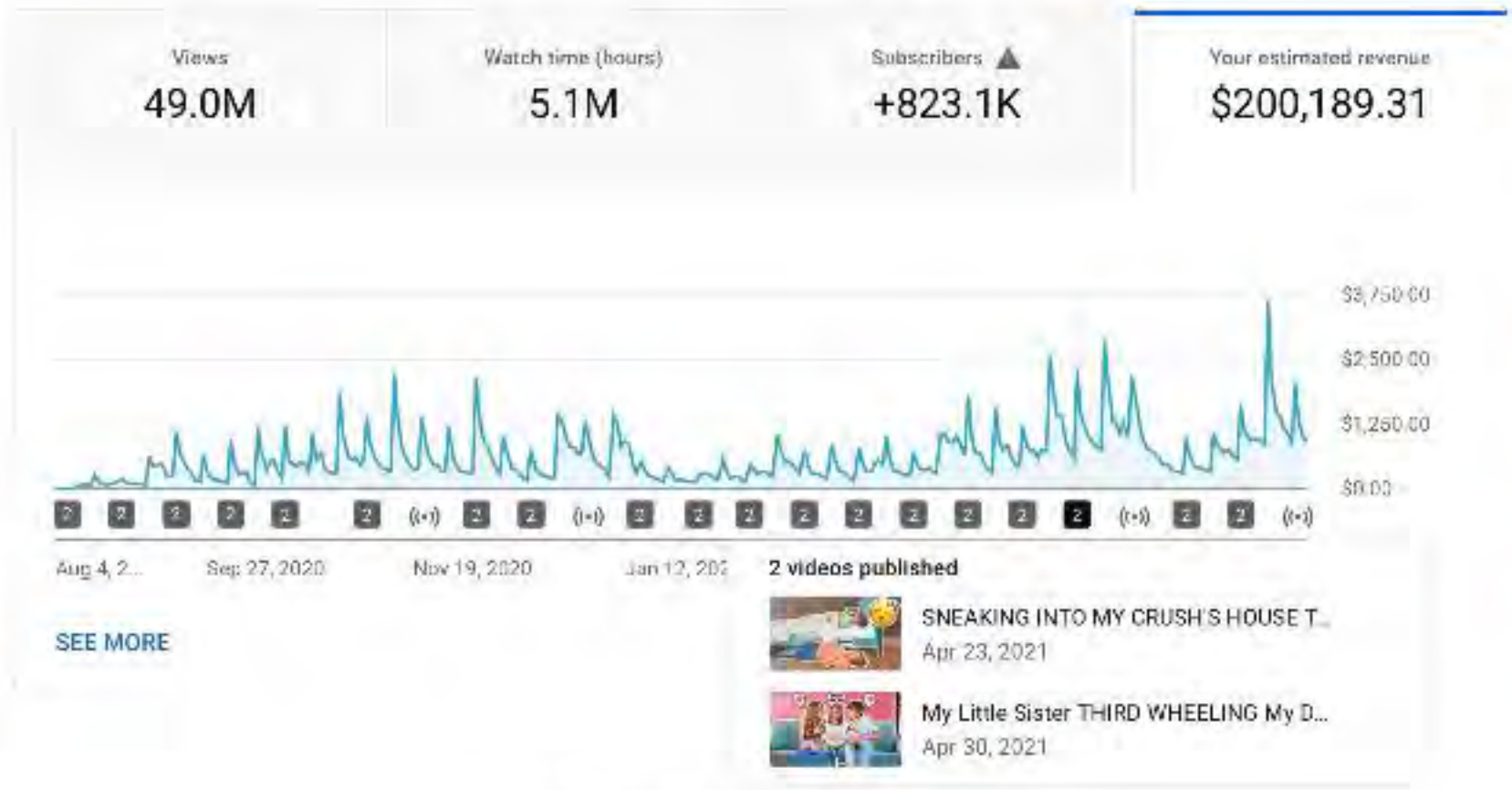
# Channel analytics

ADVANCED MODE

- Overview**
- Reach
- Engagement
- Audience
- Revenue

Aug 4, 2020 - Jul 21, 2021  
Custom

## In the selected period, your channel got 48,999,421 views



### Realtime

Updating live

**897,763**

Subscribers

SEE LIVE COUNT

**45,055**

Views · Last 48 hours



### Top videos

- RANDOMLY FALLING ASL... 7,153
- ANSWERING FAN QUESTI... 4,264
- WE FOUND A BODY IN TH... 3,414

SEE MORE

### Latest videos



### Your top videos in this period

Video	Average view duration	Views

EXHIBIT "9E"





Your channel  
Claire RockSmith

- Dashboard
- Content
- Playlists
- Analytics**
- Comments
- Subtitles
- Copyright
- Monetization
- Customization
- Audio library
- Settings
- Send feedback

# Channel analytics

ADVANCED MODE

- Overview**
- Reach
- Engagement
- Audience
- Revenue

Jul 21 - Dec 8, 2021

Custom

## In the selected period, your channel got 11,480,081 views

Views <b>11.5M</b>	Watch time (hours) <b>1.1M</b>	Subscribers <b>+35.2K</b>	Your estimated revenue <b>\$57,382.50</b>
-----------------------	-----------------------------------	------------------------------	--



SEE MORE

### Your top videos in this period

Video	Average view duration	Views

### Realtime

Updating live

**897,763**

Subscribers

SEE LIVE COUNT

**45,061**

Views - Last 48 hours



### Top videos

- RANDOMLY FALLING ASL... 7,155 Views
- ANSWERING FAN QUESTI... 4,264 Views
- WE FOUND A BODY IN TH... 3,416 Views

SEE MORE

### Latest videos



EXHIBIT "9F"



Channel

Claire RockSmith

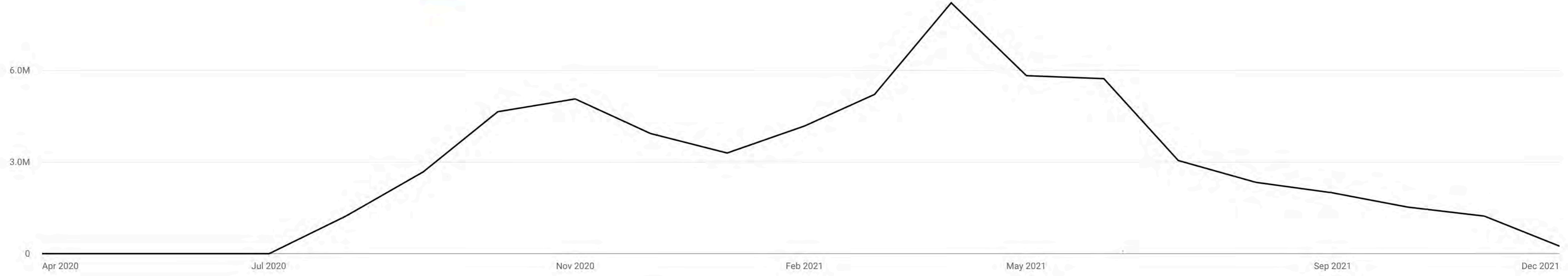
COMPARE TO...

Apr 15, 2020 – Dec 10, 2021

Custom

Filter

- Video
- Traffic source
- Geography
- Viewer age
- Viewer gender
- Date**
- Revenue source
- Subscription status
- Subscription source
- Playlist
- Device type
- Ad type
- More



Date ↓	Views	Watch time (hours)	Average view duration	Your estimated revenue
<b>Total</b>	<b>60,380,601</b>	<b>6,216,670.1</b>	<b>6:10</b>	<b>\$257,059.35</b>
December (ongoing)	253,005 0.4%	19,363.8 0.3%	4:35	\$1,352.81 0.5%
November	1,228,097 2.0%	108,937.2 1.8%	5:19	\$8,015.92 3.1%
October	1,514,996 2.5%	124,160.3 2.0%	4:55	\$7,731.30 3.0%
September	1,986,991 3.3%	181,935.1 2.9%	5:29	\$10,747.49 4.2%
August	2,327,748 3.9%	224,557.7 3.6%	5:47	\$10,506.16 4.1%
July	3,048,247 5.1%	308,501.9 5.0%	6:04	\$12,401.12 4.8%
June	5,722,334 9.5%	727,522.3 11.7%	7:37	\$32,517.29 12.7%
May	5,835,074 9.7%	678,916.4 10.9%	6:58	\$26,052.87 10.1%
April	8,223,715 13.6%	906,618.3 14.6%	6:36	\$32,463.24 12.6%
March	5,218,880 8.6%	518,120.4 8.3%	5:57	\$19,563.40 7.6%
February	4,190,122 6.9%	413,919.0 6.7%	5:55	\$11,818.25 4.6%
January	3,283,812 5.4%	314,586.0 5.1%	5:44	\$7,853.05 3.1%
December	3,928,127 6.5%	425,962.4 6.8%	6:30	\$19,964.13 7.8%
November	5,069,496 8.4%	423,945.1 6.8%	5:01	\$18,750.02 7.3%
October	4,641,382 7.7%	450,210.3 7.2%	5:49	\$21,468.41 8.4%
September	2,676,692 4.4%	264,861.2 4.3%	5:56	\$11,964.02 4.7%
August	1,231,883 2.0%	124,552.8 2.0%	6:03	\$3,889.88 1.5%
July	0 0.0%	0.0 0.0%	—	\$0.00 0.0%

Left Piper Rockelle Squad