Request For Retraction of DMCA Complaints

Jordan Loder <jordanloder@gmail.com>  To: mark@borgheselegal.com, copyright@youtube.com

Dear Mr. Mark Borghese [Youtube Copyright department CC'd]

Youtube videos in question are as follows: JkSvp17rrKU, iA0KY-4b8X8, Ap-DsiWBBB8, fpr7VNMXO04, 7XvF52ZmSU, eZ8c_ZYEBNA, 7ZrlmaX5mk, ZBO00vFGELI, -5gvzkFr0ro, i99d2x-3Zc, 0SKj_F7juK4, 2GGTxahYyZvE, 668AWEduval, _OGgsCGDu0o, onGuJ2hoA6A, k5ENZCRM1s8, MU5rpF1v0i0, 3gIZgdzZp8Q, F_hH2o8roJc, SaCvyw_kKQk, Q_2FRJu2zv4, grx5ZhEpx4E, 97mViEbXLSw, uxeaeJfwrjM, CtdQb4-h2DY

Please review the attached letter (as PDF) which contains my formal request for a retraction of the 25 DMCA complaints which you submitted against my youtube channel on 10-20-2014.

You did not contact me with any notification or requests prior to filing these complaints, and I have a reasonable good faith belief that your client has committed fraud along with other crimes.

ATTENTION YOUTUBE:

The claims of copyright violation should be rejected because:

The complainant does not hold the copyright to the material in question, is not the designated representative of the copyright holder, and therefore lacks standing to assert that my use of the material is a violation of any of the owner's rights.

The complaint has provided no copyright registration information or other tangible evidence that the material in question is in fact copyrighted, and I have a good faith belief that it is not. The allegation of copyright violation is therefore in dispute, and at present unsupported.

The complaint has provided no real contact information and may have used fake names and aliases to register the copyrights and to file the previous DMCA complaints.

The author, Robert Adams, made the content here available for free consistently over a number of years, encouraging that they be copied and shared with friends, had no desire to form an institute, and loathed books for profit based on his own spiritual beliefs.

The complaint does not follow the prescribed form for notification of an alleged copyright violation as set forth in the Digital Millennium Copyright Act, 17 USC 512(c)(3). Specifically, the complainant has failed to:

~ Identify the specific copyrighted work claimed to be infringed, or, if multiple copyrighted works are covered by a single complaint, provide a representative list of such works. [17 USC 512(c)(3)(A)(ii)]

~ Provide sufficient information to identify the complainant, including full name, mailing address, telephone number, and email address. [17 USC 512(c)(3)(A)(iv)]

Under Section 512(f) of the Copyright Act “Anyone who knowingly materially misrepresents a claim of infringement is also liable for any damages, including costs and attorneys' fees, incurred by the alleged infringer or the ISP injured by the misrepresentation, as the result of the service provider relying upon the misrepresentation in removing or disabling access to the material or activity claimed to be infringing.”

Thank you and good day,

Jordan Loder
411 Walnut Street # 7118
Green Cove Springs Florida 32043

Request for Retraction regarding YouTube DMCA complaints of 10-20-2014.pdf
192K
Wednesday October 29th, 2014

To: mark@borgheselegal.com
CC’d copyright@youtube.com
From jordanloder@gmail.com

ATTN: Mark Borghese
Borghese Legal, Ltd. 10161 Park Run Drive, Suite 150
Las Vegas, NV 89145   Tel (702) 382-0200   http://borgheselegal.com/

SUBJECT: Request For Retraction of DMCA Complaints

RE: DMCA Complaints filed Oct 20, 2014 by Mark Borghese (BorgheseLegal) on behalf of “Infinity Institute” for the Youtube videos as follows: JkSvp17rrKU, iA0KY-4b8X8, Ap-DsiWBBB8, fpr7VNMXO04, 7XvR5zIrnSU, eZ8c_ZYEBNA, 7ZIrImax5mk, ZBO00vFGELI, -5gvzkFr0ro, i99d2xr-3Zc, 0SKj_F7juK4, 2GGTxahYzvE, 668AWEDuval, _OGgsCGDu0o, onGuJ2hoA6A, k5ENZCRM1s8, MU5rpF1v0i0, 3giZgdnZp8Q, F_hH2o8roUc, SaCvyw_kKQk, Q_2FRJu2zv4, grx5ZhEpx4E, 97mViEbXLSw, uxeaeJfwrjM, CtDQb4-h2DY.

Dear Mr. Borghese,

I am writing to respectfully request that you issue a retraction letter for the 25 simultaneous DMCA complaints which you filed with Youtube on October 20, 2014. I’m sorry that you were unable to write me a letter outlining your concerns prior to taking this action which has interfered with my ability to post and has temporarily disrupted the good standing of my account.

This may itself constitute an injury or harm and now requires that I spend this time responding in defense. I would like to hear the basis for the copyright claims of your client.

Having worked exclusively for over a decade in the field of entertainment, I cannot stress enough to you how seriously I take copyright and intellectual property law. My own livelihood depends upon respect for these laws, and if you were able to provide me with legitimate evidence that I have violated someones copyright, you would find me quick to reconsider.

My belief is that your client has not told you everything they know, and is intentionally leaving you in the dark about certain matters, thereby abusing your good faith. I would also like to make it perfectly clear that along with this communication comes no personal rancor or hostility. I have no animosity towards you.
I understand that you were just performing duties you were paid for by a client who you probably know very little about. I briefly researched your career online and was very impressed. I hold your work in high regard.

I imagine that this client took advantage of the free consultation listed on your website, specifically because of your stellar and intimidating reputation, provided you with a few copyright registration numbers (which I believe may be fraudulent) and then paid you for your services in filing the DMCA complaints.

Under these conditions it is natural that this would have appeared to you as a relatively routine administrative task. You had no way of foreseeing the fascinating legal iceberg lurking just beneath the surface... I’m excited to hear your take on it, given your experience.

A valid retraction should include the following: 1) a statement of retraction 2) the complete and specific URL of each video in question 3) an electronic signature, typing your full legal name will suffice. This retraction should be sent to copyright@youtube.com from the same email address that was used to submit your original claims of infringement. If the email address is different then the one you used then Youtube may not be able to process your retraction. I would appreciate it if you could also cc me on the retraction letter here at jordanloder@gmail.com.

As you know, under Section 512(f) of the Copyright Act “Anyone who knowingly materially misrepresents a claim of infringement is also liable for any damages, including costs and attorneys' fees, incurred by the alleged infringer or the ISP injured by the misrepresentation, as the result of the service provider relying upon the misrepresentation in removing or disabling access to the material or activity claimed to be infringing.”

I am not implying, Mr. Borghese, that you yourself have filed these complaints with personal knowledge that they are false. This would be below the standard of the ethics and professionalism with which you practice law, from what I can glean. Therefore the responsibility for violating Section 512(f), if that is what has occurred, belongs to your client, with whom I’m sure you’ll vet the information contained in this letter. I trust that you will charge them for your time in doing so.

After this has taken place I’m confident you will deduce this case is not a winning one, either financially or on moral, legal, or social policy grounds. Your client does not have the deep pockets necessary to retain your services for a frivolous pursuit such as this, especially since the foundation of their claims is based upon a lie.
Regarding collectibility and my own finances I do not own a car, I do not own a house, I have no investments, no pensions, no assets, or educational degrees. I live in a rented one room hut, clean my own clothes in a plastic bucket, and ride a $40 bicycle for transportation.

I am happy that your client has finally reached out to an actual member of the legal community by this effort, in what appears to be some sort of hail mary pass on their part. This is the first time that they will ever have to answer to, and try to justify their case to someone other than themselves. They may have landed themselves in deep trouble by this action, and I intend to pursue that possibility with vigor.

Allow me to begin first by describing to you the content in question. The youtube videos I produce contain audio recordings from Satsangs, which are spiritual meetings or talks, with a gentlemen named Robert Adams (deceased March 2, 1997).

They were recorded with his full knowledge and consent in the Los Angeles area over the period of 1990-1993. They have been available free of charge as written text and mp3s for many years, including while he was alive, which he encouraged and in fact demanded.

Robert never charged any money for admission to these informal gatherings.

Rather than explain to you, in my own words, his personal desires and direction regarding the recordings and the written transcripts of them (and the publishing of books for profit) I think it would be more efficacious to share with you several pertinent excerpts directly from them, which should make things quite clear.

From “introduction to a cosmic joke” - by former student (contained within the transcripts): “As many as 4 or 5 people would be recording Robert's talk at the same time. He would be covered with microphones and wires. He once joked that he felt that he was in an electric chair.”

17th May, 1992 - Transcript 154

**Robert:** (Students are getting ready to record the talk) Good afternoon. I'm being electrocuted just excuse me. (laughter)

**Student:** Okay start again. SH: Mary? You want to kill our guru? Hey, hey. (laughs)
March 14, 1991 - Transcript 52
ROBERT: “Some of you who only come on Thursday nights are not aware that
we've got transcripts of some of these lessons. And we have lessons one to five
they are free of charge.
(\textit{Student}: \textit{Except on Sunday}. (laughter)
\textit{ROBERT}: \textit{Well they are going to be free from now on}. The fellow who prints
them up, went to a lot of trouble so \textit{he was charging for them so I told him not
to do that}. I think the way we should do it is when we get some of these lessons
some of us should make five or ten copies each and hand them out to each
other. That would be the best way, so Ed doesn't have to make two-hundred
copies by himself.

May 23, 1991 - Transcript 63
ROBERT: Anything else you would like to add to that Mary?
\textit{Student}: Ah yes, I know a lot of people have helped to print these transcripts up
and we figured Sunday it'd kind of nice to get to be a lot of people here. \textit{So if I
could get at least five more people to get ten copies of this particular one
and we will give it to the community people that will be coming.}

June 6, 1991 - Transcript 67
ROBERT: Oh, someone asked me to say something about the transcripts. Most
of you see me about four or five hours a week, and to stay on the path, keep
reading those transcripts that we give out. It's like being together. As you read
those transcripts you will keep remembering what to do. The proper way to read
them is to go through the transcript once, completely. Then, preferably before you
go to sleep, to read paragraph by paragraph, pondering each paragraph, falling
asleep as you contemplate what you read, so that you can assimilate and digest
the words. Then it's like we're together all the time. \textit{There will always be
transcripts here for you. Feel free to pick them up. They're free.}

November 1, 1992 - Transcript 196
ROBERT: Do we have announcements? \textit{Tell them about the transcripts.}
\textit{Student}: Oh yeah we do have transcripts of Robert's talks and they're on the
table \textit{they're free of charge}. Two boxes filled with them too. \textit{So please feel free
to help yourself}. \textit{ROBERT}: We want to get rid of them. (laughter)

April 28, 1991 - Transcript 57
ROBERT: \textit{The only reason we have the transcriptions of the talks is
because so many of you wanted them}. You only see me about four or five
hours a week. That's another reason why we have transcriptions. \textit{If we were
together every day I'd tear them all to pieces and throw them away}. But
since you only see me four or five hours a week at this time, the rest of the time
everything you need to know is in the transcriptions. So the proper way to read it
is this. Go through it one time completely. Before you go to sleep is the best time. Then go over it again, paragraph by paragraph. Read one paragraph and ponder that particular paragraph, until you go through the whole thing. Do this for about a week for each transcription. If you do this and you come to satsang, I can assure you that you will make fast advancement.

**July 4, 1991 - Transcript 78**

ROBERT: I do not make any comments on other teachers, but truth teachings since the beginning of time have always been free. **There should be no charge** and no obligation for anybody to come to a true guru or a teaching. And the third point is: Does the teacher charge money for a class? Does he have a weekend seminar where he charges three hundred dollars and tells you you'll become enlightened over the weekend? Be careful. **A true teaching never costs anything, it's always free, always,** and money is never discussed.

**June 9, 1991 - Transcript 68**

ROBERT: These transcripts by the way are for your own personal use and you can share them with your friends.

**October 3, 1991 - Transcript 99**

ROBERT: There is something missing. This is why I have allowed the transcripts to come into being. **When I first started teaching I didn't want any transcripts, any tapes, nothing at all. But then I realized that most of you are really sincere. I therefore allowed the transcripts to be printed.** Again, because you only see me four or five hours a week. (I was going to say, four or five hours a day. But we only see each other four or five hours a week.) The transcripts take my place. They're an extension of what we're doing. There is power in them.

**June 23, 1991 - Transcript 72**

ROBERT: Your heart should tell you what is right. The Rishis of old never charged for anything. **There should be no charge for truth. Truth is free...** So there are intensives where you are charged four, five, six or seven hundred dollars, and everybody runs to them and nothing happens. I have no more comment on those things.

**28th October, 1990 - Transcripts 19**

ROBERT: What do we do with all these tapes? (laughter)

(Student: It helps support my ego.)

R: I don't know what you do with the tapes, but I get calls from New York, New Zealand, from every place in the world. And they talk about the tapes. (students laugh) **ROBERT: Where are you sending all these tapes?**

Student: We sell them on the black market. (laughter)
Student: Our tapes are the best way to stay centered. I listen to them before I go to bed. I listen first before I get up in the morning, sometimes I listen at night and I'll listen to them all night long and I'll wake up and they're still going. (laughs)

ROBERT: I'll have to say that's fine as far as it goes but the best way is to stand naked before God, nothing, no crutch. Take me the way I am, that's the best way.

31st January, 1991 - Transcript 40
ROBERT: When someone asks me to write a book or give a lecture, then I have to explain consciousness in about fifty different words, and each word has another fifty words to explain that, and those words have another fifty words. So a voluminous book is written, with eight-hundred pages. What does it say? "Everything is consciousness." I could have written one page, and in the middle of the page I would say, "Everything is consciousness." The rest is a blank. This is the reason why I do not write books, because there is nothing to say.

8th March, 1992 - Transcript 135
Always try to remember that I am not a guru. I am not a teacher. I am not a yogi. I am a nothing. I am not looking for name or fame. I do not want to go on TV or write books or go on the radio. There is nobody left to want to do these things. There is absolutely nothing I want. And because I do not desire anything from you, I can say what I want. I can insult you. I can do anything because I don't want anything from you.

June 14, 1992 - Transcript 162
Student: I'd like to remind people that there is a box full of transcripts over there and they're to borrow and make copies of and bring back. They're starting to disappear again. That library is... anybody can help themselves just take them home and make a copy of them...you can make two copies if you like and bring them back so they're available to everybody. If anybody wants to get a few numbers and bring in the copies from their home I appreciate it. (ROBERT: Thank you.) Bring the supply back up.

November 8, 1992 - Transcript 198
Do we have any announcements?
Student: I have three transcripts that if you want to make copies of. I'll let you have them now and you can bring back five or ten copies. Anybody interested making some copies?

September 22, 1991 - Transcript 96
Student: We have transcriptions that have come in, on the table.
ROBERT: We have transcriptions for you. Feel free to take them.
July 18, 1991 - Transcript 79
ROBERT: This is why the transcriptions that we give you are most important. Due to the fact they go over the talk and you can take your time reading it. If you spend your time reading the transcripts, practicing self-inquiry and coming to satsang, then you can't lose with the stuff I use.

October 1, 1992 - Transcript 187
ROBERT: Thank you Mary. Do we have any announcements?
Student: No. There are transcripts on the table for the new people and they are free.

January 9, 1992 - Transcript 118
Student: Yes, we have transcripts and we have four more. I don't have any myself so I had to take one of them. And this is "Beyond the World of Maya." It's the new one that just came out. It's number 51 and I would like to have people make some copies if you would please.

June 7, 1992 - Transcript 160
Student: We should mention about the transcripts in the folder there. When you take a transcript out please make a couple so that we're not without because the transcripts are going and nothing's been put back in the file. If you make even one or two, take yours and just put them back in the folder. Keep it filled for us.

December 23, 1992 - Transcript 205
Student: Oh yes thank you George, there will be no satsang on Saturday until further notice. And I have five new transcripts that's out. If you will make ten copies of these and return them please. And the latest number is ninety-four. And it's "Stop What You Are Doing And Be Still." (Handing out of transcripts)

March 22, 1992 - Transcript 139
Student: I've got some transcripts. This is number 58 "The Silent Word," and I have five copies, no four copies to give out. (tape ends with Mary giving out transcripts to students for copying)

June 27, 1991 - Transcript 73
(Student talks about transcripts and the need to have them returned and help needed to copy transcripts for others. Then Robert wraps up satsang.)

July 19, 1992 - Transcript 172
Student: Oh yes I have. I have some transcripts to hand out...
ROBERT: Explain what you want them to do.
(Student: Yes.) (student explains to the newcomers what needs to be done with the transcripts)
June 11, 1992 - Transcript 161
ROBERT: Thank you Mary. Do we have any announcements?
Student: Yes I have some transcripts to give out if I may? We have another new transcript called Consciousness is Silence, it's number 69. I would like to have 5 people make some copies.

August 2, 1992 - Transcript 175
Student: We have more transcripts to be handed out to be xeroxed. And this is "Return to the Source." I do really like this one. (SG: What number is it?) It's number 80.

August 16, 1992 - Transcript 179
Student: If there are new people there are transcripts on the table that are free...

February 13, 1992 - Transcript 128
Student: Robert this word, swaruppa? The Jnani rests in...?
ROBERT: His real nature. His real self, his real nature, who he really is. (new transcripts announced by Robert on table for students to take)

16th June, 1991 - Transcript 70
R: We have some prashad. Feel free to help yourself or whatever. (during prashad Robert plays a song on tape) (After song is played)
ROBERT: We usually do not sell things here but you've all met David and he's a struggling musician and he can use the money. (CD's of Davids music are sold)

In summary, Robert Adams intentionally gave away the transcripts and recordings for free over a sustained period of time, he specifically encouraged that copies be made, and he also encouraged that these copies be shared. He was aware that they were being shared through the mail to strangers and personally approved of this. He also actively put an end to it when a student was charging for them. He did not wish to become a seller of books and had no interest in being an author.

I have contacted the Infinity Institute several times seeking to establish a donation fund for the ongoing financial support of Robert Adams immediate surviving family members. Such outreaches have been rebuked or ignored. I understand that he left a widow Nicole Adams, and two daughters one of whom is also deceased.

I'm not sure that you spent any time reviewing the 25 youtube videos detailed above before you filed your DMCA complaints. If you had, you would have
noticed that there is no profit motive built in to any of them. They are not monetized with youtube for advertising income, there are no links to any other sites with related products to be sold, and there is not even so much as a donation button to solicit funds for any ongoing costs or my time in making the videos. I offer them free of charge in the spirit in which the author intended, based upon audio recordings which are in the public domain.

I add stock images to those pre-existing mp3’s (which are freely available from multiple sources) and post the resulting combination to youtube. I do not distribute any mp3s to anyone and I do not charge any money for anything. This is a labor of love on a volunteer basis in memory of Robert Adams and for the benefit of his students everywhere.

It is rumored that your client The Infinity Institute (also referred to as ICL) has no relation whatsoever to the original author, nor his family, and has instead posthumously usurped his work in the interest of personal financial gain. If you have information to the contrary please provide it.

In fact, none of Robert’s original students have the foggiest idea who represents the Infinity Institute. It seems that this mysterious group has gone out of it’s way to disguise and conceal the identity of its officers, using a wide variety of aliases and email addresses many of which result only in bounce-back dead end failure messages.

The only links that work on their page are clicks to purchase their products which consist mostly of very brief sections of the transcripts read by a third party voice-over artist, on top of syrupy new age music. Their right to sell said products is dubious at best and trying to decipher their website is like being trapped in an M.C. Escher painting.

If you haven’t yet taken the time to review their website I suggest you grab some popcorn and go there now. [http://www.robertadamsinfinityinstitute.org/](http://www.robertadamsinfinityinstitute.org/) The legal disclaimer at the bottom deserves special attention. It is the stuff of legend. I reproduce selections of it with you here below because you have become entangled in this affair as their current legal representative. Please do not reproduce this elsewhere or they may try to sue you too. That’s a joke, mostly.

**Required Updated Legal Disclaimer:** Legal Removals/Prosecution; Documentation on Fraudulent Information: Websites; “Without obeying the laws of Correct Action, the karmic laws, The Golden Rule, one cannot begin to progress. In this world the darkness will always be threatened by the light, but the light will prevail.” Beloved Robert Adams own works and teachers, site per cyber crime by strangers documentation; [Per FBI](http://www.robertadamsinfinityinstitute.org/)
Investigation, Interpol investigation/prosecution, fine and imprisonment of recent sources of international mass black market piracy, GOOGLE, YOUTUBE, FACEBOOK, PINTEREST LEGAL REMOVALS; REQUIRED DISCLAIMER: Wise Discernment: FRAUDULENT INDIVIDUALS, WEBSITES UNAFFILIATED WITH ROBERT ADAMS, unknown to Robert Adams or his institute, and brief guest evicted by Robert Adams for theft, have no interaction, relationship nor representation with Robert Adams Institute per; See attorney required Cease and Desists, Removals. The infinity institute has exchanged no communication nor has any knowledge of the individuals addressed by attorney protocol.

Required Disclaimer; Legal Documentation per fourteen removals of fraudulent affiliation, information and website deliberately following this listing, said individual following this website per the laws of spiritual integrity and international copyright laws of infringement and piracy have been consistently legally removed by authorities for cyber bullying, inciting the public to cyber bully and harass, theft, invasion of privacy, posting stolen imagery of private individuals devoid of authorization, slander, defamation, international piracy, distribution of stolen goods, harassment, fictitious information, false and misleading claims, printing false information within stolen documents, negating the copyright of the author in his establishment of his institute solely for his works.

Per your wise discernment and protection in the seeking of pure clean spirituality in The Pure Form beauty of the original seven hundred discourses of the internationally established Sage; Robert Adams own self established directed institute disseminating the pure form forty year Teaching is identified by his IL Logo assuring you of receiving his own formatted Teaching honoring his moral and ethical laws and decades of established format for ‘generations to come’ by his lineage and his self selected teachers of 30 plus years of students hip. We apologize for being unable to respond to your gracious and beautiful letters of complaint and objection to inaccurate attempts at stealing or illegally representing the gentle, beloved Sage, particularly by our cherished inner Circle lifetime students who spent so many years with our gentle Sage. Individuals ordered to Cease and Desist by the authorities were entirely unknown to Robert Adams or were unaffiliated guests for one to three years at one hour talks, reinventing their personas garnering public false affiliation establishing ‘careers’ based on the fictitious unaffiliated use of Robert Adams name and Teaching. The direct blessings, presence and sweet nectar of this gentle American Sage is transmitted through his timeless rich transmissions, “to those able to comprehend the Truth. Westerners are often ungracious, belligerent, greedy with spiritual information, collecting
information for head knowledge, desiring to be teachers. they have no understanding of the origins of the culture, of humility, loving kindness.’
Robert Adams

The Pure Form Original Teaching of Robert Adams through the Robert Adams lineage:

Per Wise Discernment: Throughout history, commonalities of fictitious dishonor and falsity have attempted affiliation with great saints and sages, in transgression of laws of spiritual ethics and integrity, misleading innocent and uninformed seekers. Per you wise discernment, FBI, Google and Legal Authorities have removed fraudulent websites following this one from strangers, and/or evicted audience guests/complete strangers, brief listeners of Robert Adams, including inaccurate blogs attempting affiliation in seeking public audience, and host site removed at the discretion of the host and authorities due to legally documented criminal activities. Google or legal documented injunction due to fictitious and fabricated, internet and e-mail harassment, claims, theft, piracy, slander, cyber bullying, invasion of privacy, and inciting the public to harass, by complete strangers unknown to the Robert Adams Infinity Institute, nor ever exchanging communications, evicted by Robert Adams for stealing/selling his transcripts during and again following his Teaching.. Per your wise discernment in requested truth In the tradition of all great teachings, clarification per unethical false affiliation is requested; Unethical site and blog featuring fabrications in misleading innocent seekers have been removed regularly by web hosts, the authorities, Google, Legal Enforcement due to infringement, organized piracy and international crime, false claims, false titles of 'complete teachings' with fabricated information, misinterpreted unrelated contrary 'teaching' entirely unaffiliated with Robert Adams, illegal use of the name of Robert Adams to establish personal career and social media identities, retreats, entirely fabricated affiliations, cyberbullying, resulting in the retraction of unrelated personal self pronounced interpretations and teachings, infringement, illegal affiliation, Required legal disclaimer two : book retractions by publishers due to false information and false claims of studentship; Per internet regulation- books retracted by publishers due to false claims, inaccuracies, copyright in infringement by publishers. (2) Watkins Publishing has retracted the chapter in Teachers of the One in gracious apology stating that they confirmed that the person was never a student of Robert Adams, nor member of any R.A. group although stated, and is unknown to students of Robert Adams, withdrawn narrative; Google and authorities have removed websites, blogs and attempted sites or
presentations contradicting the respected personal copyright established by Robert Adams, who directly refused affiliation, interpretation of representation/presentation of his personal experience and Teaching / words by individuals not of his own Institute, individual evicted by Robert Adams; relaying inaccurate interpretation, and contrary ethics and lifestyles that are not relayed by Robert Adams do not reflect his Pure Form Teaching. The truth is imperative in spiritual integrity. providing the actual teaching of Robert Adams who denied all permissions for affiliation. For further information on this and other retracted books please contact Melanie Warner M.A. The Robert Adams Infinity Institute. In the Truth of Spiritual, Moral and Ethical Integrity, providing "Truth to the Sincere Seeker." Blessings in the deepest unchanging peace to you all. “No matter what happens to you on this earth, remain humble, kind, pure. Correct incorrect actions, establish peace, cease creating karmas. This is the only way. Peace. Peace. Peace.” Robert Adams

Of special intrigue is the way the ‘Institute’ states that the FBI and Interpol have removed “stolen black market content” on 14 occasions. Translation? The ICL filed 14 DMCA complaints against other people, accompanied by scary threatening legal emails, and those people did not file counter-notifications because they were afraid.

Mr. Borghese, I certainly hope that the FBI and Interpol have better things to do. I cannot think of a single reason why the Infinity Institute would invoke this fabrication or present their DMCA takedowns in this way except to inspire fear and intimidation. It appears to be absolutely false. Again, any evidence to the contrary is kindly welcomed.

The first evidence we have of their even being any such thing as the “Infinity Institute” is the registration of their website on October 3, 2003 some six years after Mr. Adams death. http://www.whois.com/whois/robertadamsinfinityinstitute.org

Beginning sometime in 2011 this mysterious Infinity Institute began issuing threatening emails and DMCA complaints galore to anyone who even mentioned Robert Adams name online. Their shtick was to threaten people with lawyers fees and flowery legal language which can barely be described as English.

This intimidation tactic was successful for quite sometime until I posted some Youtube videos, and found myself on the receiving end of a calculated campaign of harassment.
They issued the first 6 DMCA complaints against me on April 8, 2014 which shut my channel down. After satisfying due diligence by performing detailed research and determining that they had no legal grounds to do this, I in good faith, counter-notified on May 8, and the videos were restored by Youtube on May 28.

Infinity Institute issued 4 additional complaints on May 23, I counter-notified on May 26, and those videos were restored by Youtube on June 9.

Then they came with another attack this time by filing 14 complaints on July 1, 2014 which also shut the channel down. I counter-claimed MANUALLY the same day, July 1, because the channel had been blocked in such a way that the counter-notification button was not available and I was completely frozen out of the account. This again may constitute an injury or harm.

After much patience and polite persistence, Youtube restored those videos on July 16, cleared all strikes, and reopened my channel and returned it to good standing. It remained in this condition until you were hired by the Infinity Institute in what I believe is a transparent attempt to intimidate me into submission. This will not occur.

During this entire process, the Infinity Institute (or ICL) brought no legal action against me in a court of law, as a legitimate copyright holder would have done. This furthered my reasonable good faith belief that their copyright claims were, in fact, bogus. Instead they tried to manipulate me into capitulation by sending me the following email (within youtube messaging) on May 1, 2014 which states the following:

“Apparently the last restoration of your video was a mistake at the youtube office that you have posted.”

“The FBI and Interpol, Google, Yahoo and Bing have all removed this Robert Adams stolen content from the internet. We recommend you do the same.”

I reported this communication to Youtube and inquired with the copyright department. There was no acknowledgement of any mistake, instead it seems that they only followed the letter of the law regarding safe harbor provisions.

Next, the Infinity Institute shifted venues and played the same game on Facebook by shutting down a public Robert Adams group page which I administer. I filed a counter-notification with Facebook and my page has been unblocked, restored, and active ever since.
Again whoever owns the “institute” is quite happy to utilize the DMCA process to shut people down, but apparently they are afraid of presenting their information in a court of law. I feel that there is already here a strong evidentiary trail which documents a solid case for online harassment and/or cyber-bullying, conducted by your client.

I am personally aware of at least 5-10 other groups and individuals who received similar threats who have voluntarily taken the content down, at least one other facebook group which actually was shutdown and remained so due the the fact that they did not counter-notify, and one other individual such as myself who was attacked on youtube, submitted counter-notification, and the corresponding content has been restored and is now active.

The good standing of my Youtube account has now been interrupted once again by this new batch of 25 DMCA complaints which you, Mark Borghese, have personally filed with youtube on October 20, 2014.

I believe that the ICL has contacted you in exasperation, not knowing how to handle someone who is actually willing to submit themselves to legal action. At first when I saw your credentials I think the effect they were desiring was achieved. In fear I decided that I would rather drop the entire matter than face someone such as yourself, and of your acumen, in court.

However, after thinking it over and discussing it with a friend who is an intellectual property lawyer I could not escape the fact that I truly do not believe I am violating any valid copyright. This is especially true because all of the registration numbers I have seen with the Library of Congress are for text only and do not contain a single SR registration. I am not presenting any of the text in the videos I produce, and you have failed to provide me with any copyright registration numbers whatsoever regarding these 25 alleged infringements.

As I understand it, the copyright of the sound recordings belongs to the individual technicians and students who recorded them. Since no one present during the period from 1990-1993 has any clue who the Infinity Institute even is, it would be impossible that someone from this rogue company was there to press record and even more unimaginably bizarre that they would somehow own the copyrights. Your client has been, and is, committing fraud.

Additionally curious, the transcripts were published first online by verified legitimate students of Robert Adams who are mentioned numerous times within the recordings themselves. You can even hear their voices speaking and they are alive and well today, completely baffled by this unfolding of events.
It was only after this online posting that the ‘Infinity Institute’ even filed their copyright claims in 2007, some ten years after Robert Adams death. Mr Borghese, the ICL did not even have access to the transcripts until they were posted online by genuine students.

Next I would like to provide you with an article which was published in “Ramana Periya Puranam Book” by V Ganesan, the nephew of Ramana Maharshi, who was Robert Adams teacher or guru. https://www.flickr.com/photos/shastrix/9089031473/

In it Mr. Ganesan describes what Robert shared with him regarding his outlook on teaching work in America. Mr. Ganesan is a well regarded member of the community in South India as the nephew of Ramana Maharshi, and has strong relations with the family of Mahatma Ghandi. I can assure you that he is an honest man, and that he is alive and well, as I am meeting him for a visit this very week. He corresponded and visited with Robert Adams for many years.

---

{regarding Robert Adams}

“Robert wandered around India, meeting with sages and saints. He did this for a few years. Then, Bhagavan appeared once again in his dream and said, “Go back to your country and spread the teaching of Self Enquiry, how to attain Self realization and how to stay in the state of “I AM” to seekers in America.” Bhagavan very specifically stated, “Do not start an institution. Do not be a guru... On reaching Hollywood, he was afflicted by Parkinson”s disease and was forced to remain there.

A beautiful woman named Mary, along with her friends, attended on him. They also helped him disseminate the teachings of Bhagavan”s Self Enquiry. He conducted satsangs and had small gatherings. His presence was very powerful. He would sit in the hall in silence for twenty minutes and everyone around him would become absolutely silent.

It did not matter how many people were gathered there, or who was there. Ultimately, after the period of silence, Robert would speak for a few minutes. When I wrote to Robert Adams asking for permission to meet him, he replied, “You can meet me in Los Angeles.”

At the time, the president of the Course of Miracles, Dr. Tara Singh, was at Ramanasramam and he invited Anuradha and me to stay in their headquarters in Los Angeles. “I will arrange for you to meet Robert Adams,” he said. He arranged the meeting with Robert in a restaurant. We met there because (Robert Adams) had no institution, not even a house to call his own.

---
It also appears there may have been some rift or bifurcation within the self-proclaimed Infinity Institute itself {see https://www.chillingeffects.org/notices/735697 from which I quote below}

“Official DMCA Violation Notice, Please be advised that I, Blake Warner represent the Infinity Institute, ("Infinity Institute") in intellectual property matters. As such, please direct any correspondence to me, rather than the Infinity Institute.(blake.r.warer@gmail.com)”

“Please act accordingly, and call me with any questions. This letter does not constitute a waiver of any rights belonging to our client. Thank you for you immediate assistance in this area of international piracy and theft. Regards, Blake Warner PhD Infinity Institute Blake.r.warner@gmail.com”

Notes: Mr. Warner is indicating that Infinity Institute is a client, not that he works at the Institute himself.

“It has come to my attention from the Infinity Institute of Robert Adams, that http://advaitarobertadams.blogspot.fr/2012/07/humility-compassion.html and the links therein on the sidebar some mentioned below constitutes the copyrighted works of Robert Adams and that on the 293 stolen pages of this blog also contain the Interpol/FBI ongoing investigation Pirate bay site that contains the Teaching of Robert Adams at http://robert-adams.info

Notes: If Mr. Warner is receiving information FROM the Infinity Institute this would appear to indicate two separate parties.

“Their wrongful misappropriation and distribution of this material has prevented the non-profit Infinity Institute from publishing Robert Adams' works in the manner and format he personally established and approved prior to his passing.”

Notes: I tried to make a donation to the Infinity Institute but they admitted to me that they do not accept donations because they are not a non-profit.

Many people would like to know... who is this Blake Warner? The ICL website boasts of an international teaching career of his, but there is no trace of him whatsoever online which is rather interesting.

Although I suspect that Blake Warner is a fictitious name, if there is actually such a person and he is no longer working for the Infinity Institute, then I would like to receive separate full legal contact information for him. He may have exposed
himself to legal liability of his own, independent of the Infinity Institute. If this is true then I reserve the right to take legal action against each of them individually.

“The website contains misappropriated written transcripts of Robert Adams, in a PDF /MP3 format which are now freely available for download. Their wrongful misappropriation and distribution of this material has prevented the non-profit Infinity Institute from publishing Robert Adams' works in the manner and format he personally established and approved prior to his passing.”

Notes: 1. if the material is attributed to Robert Adams then it is not misappropriated. 2. how has the distribution of this material prevented them from publishing in the ‘manner and format he personally established”? 3. The Infinity Institutes sister site states that “the purpose of the Infinity Institute was, and is, to be the continuation of his original unedited teachings. Quote Robert: "Keep it simple."” He left no other lineage of teachers. http://www.robertadamsssite.com/robertsmailbox.htm

The Infinity Institute is therefore criticizing, attacking, and threatening legal action unto others for presenting Roberts teachings unedited and free of charge as he emphatically intended, but they themselves are doing the exact opposite. They have not kept it simple, by only using tiny portions of the work and clouding it with music and using voice-over artists instead of his own voice, they are not representing the teachings in their unedited form, and they are charging money for them. They are not even in alignment with their own mission it seems, let alone the wishes and instructions of the originator, Robert Adams deceased 1997.

Mr Borghese, in my efforts to defend myself against the unreasonable and nonsensical actions of your client I have already spent a great deal of my own personal time and resources. In addition to the retraction letter I am requesting I will also need to know wether you intend to represent this client any further or weather you shall recuse yourself as their council. This is of vital importance.

If you are no longer representing them, then I will need to be provided with the full legal name and actual mailing and physical address of their chief officer(s) for process service. Please provide a real human beings name and a real VERIFIED address so I may have a sheriff serve them with paperwork when I proceed with a lawsuit against them. I have asked for this in the past and been provided only with false names and addresses. This is unacceptable.

I have a reasonable and good faith belief that your client is guilty of filing fraudulent copyright registrations, representing themselves as a non-profit when in fact they are not, causing harm and injury to myself and others through an
online campaign of harassment, intimidation, and cyber-bullying, profiteering at the expense of a dead man who had no desire to publish commercially available books for sale, abusing the DMCA process, misrepresenting their names on official documents which may constitute perjury, and violating Section 512(f) of the Copyright Act.

Finally, Mr. Borghese I am writing to inform you that today October 29, 2014 I will be manually submitting counterclaims with Youtube for the 25 complaints which you have personally filed on October 20th. According to the DMCA provisions I trust that Youtube will forward you copies, but in summary the reasons for the counter-notifications are as follows:

To Youtube  Wednesday October 29, 2014

The claims of copyright violation should be rejected because:

The complainant does not hold the copyright to the material in question, is not the designated representative of the copyright holder, and therefore lacks standing to assert that my use of the material is a violation of any of the owner's rights.

The complainant has provided no copyright registration information or other tangible evidence that the material in question is in fact copyrighted, and I have a good faith belief that it is not. The allegation of copyright violation is therefore in dispute, and at present unsupported.

The complainant has provided no real contact information and may have used fake names and aliases to register the copyrights and to file the previous DMCA complaints.

The author, Robert Adams, made the content here available for free consistently over a number of years, encouraging that they be copied and shared with friends, had no desire to form an institute, and loathed books for profit based on his own spiritual beliefs.

The complaint does not follow the prescribed form for notification of an alleged copyright violation as set forth in the Digital Millennium Copyright Act, 17 USC 512(c)(3). Specifically, the complainant has failed to:

~ Identify the specific copyrighted work claimed to be infringed, or, if multiple copyrighted works are covered by a single complaint, provide a representative list of such works. [17 USC 512(c)(3)(A)(ii)]
~ Provide sufficient information to identify the complainant, including full name, mailing address, telephone number, and email address. [17 USC 512(c)(3)(A)(iv)]

I look forward to hearing from you, and despite the circumstance which now brings us together, I'm actually honored to meet you, and wish you continued success in your career.

With love and respect,
Jordan Loder

411 Walnut Street # 7118
Green Cove Springs Forida 32043
Cease and Desist Willful Copyright Infringement

Mark Borghese <mark@borgheselegal.com>       Fri, Nov 21, 2014 at 12:47 PM
To: robertadamsstudents@gmail.com

Mr. Loder,

Please see the attached correspondence regarding your continued infringement of Robert Adams’ copyrighted material.

Mark Borghese
Borghini Legal, Ltd.
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
T: (702) 382-0200
F: (702) 382-0212
www.borgheselegal.com

This message, including any attachments, is confidential and may be privileged. If you have received it by mistake please notify the sender by return e-mail and delete this message from your system. Any unauthorized use or dissemination of this message in whole or in part is strictly prohibited.

2014-11-21-Loder.pdf
29K
November 21, 2014

VIA EMAIL AND U.S. MAIL

Mr. Jordan Loder  
aka “Jordan Whorms”  
411 Walnut Street # 7118  
Green Cove Springs, FL 32043  
Email: robertadamsstudents@gmail.com

Re: Cease and Desist Willful Copyright Infringement  
Our Reference No.: RAIL.0001G

Dear Mr. Loder:

As you know, this firm represents the Robert Adams Infinite Institute (“Infinity Institute”) with regard to certain intellectual property matters. The Infinity Institute was formed with Robert Adam’s widow and heirs who are active in the organization. The Infinity Institute is the worldwide owner of the copyrighted works of the late Robert Adams, including his books and satsangs, as well as all trademarks and rights of publicity associated with him (collectively, “Adams IP”). The Infinity Institute works tirelessly to preserve the legacy and teachings of Robert Adams.

It has come to my client’s attention that you are in possession of stolen transcripts of Mr. Adam’s satsangs along with stolen personal family photos of Mr. Adams. You are apparently actively distributing these items on the internet in reckless disregard of my client’s rights. According to my client, the stolen transcripts and your actions are currently being investigated by the FBI and Interpol.

In addition, according to my client you publicly posted an intentionally defamatory letter on Facebook which included false allegations of fraud against my client. These allegations were made by you with malicious intent which may subject you to punitive damages.

Despite numerous warnings you continue to willfully infringe Infinity Institute’s intellectual property. United States Copyright Law grants exclusive rights to the copyright owner to reproduce and distribute copyrighted works as well as prepare
derivative works. See 17 USC §§ 106 and 501. Because my client’s rights have been infringed, my client is entitled to recover significant damages including statutory damages of up to $150,000 per work as well as attorney’s fees and costs. See 17 USC §504(b) and (c) and 17 USC §505.

SETTLEMENT DEMAND

Without waiving any of its rights in law or equity, the Infinity Institute demands that you within ten (10) calendar days from the date of this letter:

1. Remove all public and private posts, videos, photographs, transcripts, and any other item posted by you on the internet which contains any Adams IP including on YouTube, Facebook, Twitter, Pinterest, and on any website, blog, or message board;

2. Remove all links posted by you which link to any material containing any Adams IP including on YouTube, Facebook, Twitter, Pinterest, and on any website, blog, or message board;

3. Delete all copies of any material containing any Adams IP in your possession, custody, or control;

4. Cease any further copying, display, or distribution of material which contains any Adams IP;

5. Cease all defamation and harassment of the Infinity Institute and its officers, directors, and founders; and

6. Confirm in writing that the above action has been taken.

To the extent you are willing to cooperate, the Infinity Institute is prepared to consider the above a full resolution of this matter. However, if you fail to comply with these demands within ten (10) calendar days of the date of this letter, we will presume that you do not intend to voluntarily take the necessary actions outlined above. In such case, my client reserves the right to pursue all available avenues of legal redress for the aforementioned copyright infringement, including the commencement of formal legal action against you for copyright infringement without further notice.

DUTY TO PRESERVE ALL EVIDENCE

Please be advised that if you fail to comply with the above settlement demand you have a duty to preserve all evidence that may be relevant to the dispute as you are on notice of potential litigation. This duty of preservation extends to, but is not limited to, data files, e-mails, calendars, telephone logs, access lists, and logs that are located on your computer networks, e-mail servers, mainframes, individual computer workstations,
and external drives. This duty further extends to data located on any device within your control but not owned by you, such as web based email and cloud storage. Specifically, but not exclusively, you are on notice that you must preserve all evidence of your acquisition and distribution of the Adams IP.

You are required by law to suspend any practice, even a normal or routine practice, that might purge, delete, or overwrite any electronic document or other evidence, including database records, file remnants, and residual and hidden data. This duty extends to your partners, agents, and computer service providers. We request that you notify any such persons of this retention duty immediately. This duty further extends to the preservation of replaced computers, hard drives, and other storage media. If you back up your computer drives, you must preserve the back-up files as well. We request that you immediately back up and archive any documents, including e-mails and all other communications, between you and all other persons and entities that relate to your acquisition and distribution of the Adams IP. We further request that you suspend any act or practice that would cause de-fragmentation, compression, or reformatting of hard drives or deletion of cached information.

Sanctions for violating any of the foregoing duties can be severe and include substantial monetary sanctions and adverse inferences in evidentiary rulings. We remain hopeful that we can resolve this dispute short of litigation. The above duties, however, must be satisfied during any settlement or other discussions that we may have.

Nothing contained in or omitted from this letter is or shall be deemed to be either a full statement of the facts or applicable law, an admission of any fact, or a waiver or limitation or any of my client’s rights or remedies, all of which are specifically retained and reserved.

We look forward to your prompt response.

Best regards,

Mark Borghese

cc: Client
Dear Mr. Borghese,

I understand from previous communications that you represent the "Infinity Institute", an organization, with regard to 'certain intellectual copyright matters'.

You are the only human being on the face of the earth who has any direct contact with your client, the "Infinity Institute", because they appear to have gone to great pains to conceal their identity from the public, and they have consistently failed to provide a business address, either online or upon written request.

I have already explicitly expressed to you my concerns that your client may have deliberately provided you with false information during the course of your representation, and that they may have intentionally retained your services with malicious intent and/or in the furtherance of potentially fraudulent or criminal activity. I encouraged you to conduct due diligence in this regard, by verifying their identity for yourself, and you chose not to reply.

In order to pursue civil litigation against your client for damages unrelated to copyright matters, and in order to report them to the appropriate prosecuting authorities for investigation regarding other criminal offenses, I hereby formally request that you consult with your client and provide the following information to me within 10 business days.

__________________________________________________________

1. The legal identity and business form of your client (Non-Profit, Corporation, or DBA) and up to date contact information (address and phone number) for process service and other court documents.

__________________________________________________________

2. If the "Infinity Institute" is a non-profit, please also provide:

A. Form 990's for the past three years.

B. Federal Tax ID number

C. State ID number

D. Name, address, and phone number for the service of process and other court documents

D. Up to date list of managing directors

E. Articles of incorporation and bylaws

F. Purpose of tax exemption
G. Any other documents required to be made available to the public upon request.

3. Please provide the above information for any and ALL non-profit’s registered by your client under the name "Infinity Institute" either in the state of Nevada, the state of North Carolina, or in any other state.

Continued withholding of this information may indicate that you are willfully shielding your client from appropriate investigation by the prosecuting authorities regarding matters which pertain to the public interest, and that you may be intentionally assisting your client in the ongoing commission of fraudulent activity and/or other criminal offenses.

4. Is your client the owner of the following copyright registration. Yes/No

Silence of the Heart TV Movie 1984

1. http://cocatalog.loc.gov/cgi-bin/Pwebrecon.cgi?v1=27&ti=1,27&Search%5FArg=silence%20of%20the%20heart&Search%5FCode=TALL&CNT=100&PID=y8CumwboDja4zerl0diJbmSh_1&SEQ=20130624031658&SID=4

http://www.imdb.com/title/tt0088115/

5. Is your client the owner of the following copyright registration. Yes/No

Reflections of the Christ Mind - by Paul Ferrini

1. 2. http://cocatalog.loc.gov/cgi-bin/Pwebrecon.cgi?v1=34&ti=1,34&Search%5FArg=silence%20of%20the%20heart&Search%5FCode=TALL&CNT=100&PID=y8CumwboDja4zerl0diJbmSh_1&SEQ=20130624031658&SID=4


6. Do you represent an individual by the name of Blake Warner? Yes/No

Your clients copyright claims are admittedly based upon the following registration numbers: TXu000549212 / 1992-12-28 (Robert Adams), TXu000797272 / 1996-11-14 (Nicole Adams), TXu001190209 / 2004-07-19 (Blake Warner). You have issued a cease and desist letter to me based upon those claims.
I have expressed my concerns to you that your client may not be the actual copyright owner, and that they are possibly utilizing your professional services in the furtherance of criminal activity. The blatant factual misrepresentations published on their website are too numerous to mention here, but they are indicative that perhaps your client is not to be trusted.

7. Please provide me with a copy of the Library of Congress copyright registration forms for the following:

TXu000549212 / 1992-12-28
TXu000797272 / 1996-11-14
TXu001190209 / 2004-07-19

If these are not provided then I will assume that your client, The "Infinity Institute", is not the copyright owner, and that there is no basis for litigation regarding "Robert Adams IP".

As you know, in order to pursue litigation for alleged copyright infringement, the work must first be registered appropriately with the Library of Congress. Without such registration there is no prima facie case, and no guaranteed award for attorneys fees and court costs.

8. Regarding copyright registration number TXu000549212 / 1992-12-28, please describe weather this was filed using the Pseudonym 'Robert Adams' (with the pseudonym box checked) OR if it was filed by a true legal person named 'Robert Adams'.

9. Regarding copyright registration number TXu000797272 / 1996-11-14, please describe weather this was filed using the Pseudonym 'Nicole Adams' (with the pseudonym box checked) OR if it was filed by a true legal person named 'Nicole Adams'.

"please note that in this registration 'Nicole Adams' is clearly listed as DECEASED 1997. This contradicts the claims which your client made to you that 'Nicole Adams' is ACTIVE in their organization 'The Infinity Institute'. I expressed concerns about this to you in writing, and you chose not to reply.

10. Regarding copyright registration number TXu001190209 / 2004-07-19, please describe weather this was filed using the Pseudonym 'Blake Warner' (with the pseudonym box checked) OR if it was filed by a true legal person named 'Blake Warner'.

In your Cease and Desist letter to me, dated November 21, 2014 your client claimed that I was in possession of "stolen personal family photos of Mr. Adams and that I was actively distributing these items on the internet'.

I have asked you multiple times, in writing, to provide a description of these photographs, and you have failed to do so. This is unacceptable. My last request for this information was sent to you on 12/8/2014 which is over 6 months ago. You have not replied.

11. Please provide a detailed description of the 'stolen family photographs'.

https://mail.google.com/mail/u/0/?ui=2&ik=99f6060633&view=pt&q=mark%40borgheselegal.com&qs=true&search=query&th=14edfcea381f482d&siml=14edfcea3...
The only form of contact listed on your clients' website is an email address, and emails sent to this address remain unanswered. If the organization is a legitimate non-profit then one would expect them to operate at a higher level of transparency, and a more accountable approach in terms of public relations, since their tax exempt status has been granted only because of their basis as an entity presumably engaged in service of the public good.

If you are unwilling to provide answers to any one of the individual questions above (1-11), please do not use that as an excuse not to answer the ones which you can. In any case where you are unwilling, please be so kind as to describe the purpose for not answering (or withholding) the information.

Sincerely,

Jordan Loder

--

Jordan Loder
Tour & Production Manager - Snatam Kaur
Tour & Production Manager & FOH Audio - Simrit Kaur
Booking Agent: "The Last Waltz Live"
Booking Agent: "Simrit Kaur"

Musician and Songwriter