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Opmerking [S1]:

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Liberty Media Holdings, LLC, a California Corporation)
Plaintiff,)
vs.)
FF Magnat Limited d/b/a Oron.com; Maxim Bochenko a/k/a Roman Romanov; and John Does 1-500,)
Defendants.)

Case No.: 2:12-cv-01057
DECLARATION OF SYBRAND R. KUPPENS IN SUPPORT OF PLAINTIFF'S REPLY TO DEFENDANT FF MAGNAT LIMITED'S OPPOSITON TO MOTION TO ENFORCE SETTLEMENT AGREEMENT

I, SYBRAND R. KUPPENS, being over 18 years of age, having personal knowledge of the facts set forth herein, and being competent to testify to the same if called to do so at trial, state as follows:

1. I am the CEO of International Media Company B.V., based in the city of Uitgeest in the Netherlands.
2. Whenever possible, I attempt to assist law enforcement with identifying online file sharing sites that facilitate the dissemination of child pornography.
3. I monitor indexes of file hosting sites and forum boards online with an eye toward observing files that are named in such a way that they imply that their contents (may possibly) contain child pornography. A copy of screen shots of an example of these works found on Xbiz Forum Board is attached to this declaration as Exhibit A.



1 4. These links describe themselves as containing “Lolita dog lover” and “Amazing
2 Russian lolita.” The term “Lolita” is commonly used to describe young girls that are perceived to
3 be sexually attractive by the individual using the term. Online, this terminology is often code used
4 to express that the girls are underage.

5 5. I do not personally know if these links actually contain movies of underage children
6 engaging in sexual acts with dogs or underage Russian girls, because it would not be appropriate
7 for anyone other than a law enforcement officer in the field of prosecuting such illegal content to
8 actually open or select these links, or to download or otherwise use the files contained therein.

9 6. However, I find the mere connotation that files that insinuate the viewer will
10 possibly be able to access child pornography is unconscionable.

11 7. Further, the only individuals who would download files named as such would
12 primarily be individuals seeking to locate actual child pornography. I believe the presence of these
13 files is enough to establish sincere concern and could lead to credible belief that other files
14 containing child pornography exist on Oron’s servers.

15 8. Additionally, I have viewed several threads on forumophilia.com which contain
16 links to highly questionable pornography including threads titled “Incest commix-big collection,”
17 “Sleeping porn-Sleeping sex-Sleeping teen-Sleeping Bea,” “Sleep girls drunk run time,” and
18 “Mature men and young girl, daddy and babies.” A copy of these listings on the website is
19 attached as Exhibit B. A cursory look through these threads shows that an alarming number of the
20 links to these materials are Oron links.

21
22 I hereby certify that the foregoing is true and correct to the best of my knowledge, sworn
23 under the penalties of perjury under the laws of the United States.

24 Dated this ~~Thursday~~ day of July, 2012 in WITGESSI
25 19

26
27 

28 SYBRAND R. KUPPENS

