

**Copyright Royalty Judges  
Washington, D.C.**

**Distribution of 2014 Dart Royalty Funds**

**Docket No. 15-CRB-0011- SRF(CO)  
2014**

**Reply To AARC Response In Opposition to CGN Motion To Dismiss AARC**

CGN INC. d/b/a David Powell reply in opposition to AARC 11-25-19 letter to dismiss 2<sup>nd</sup> under false pretext reply. Morgan Presumption shifts burden of proof to AARC artist(s) and record labels. AARC contractual authorization letter by their hand full of claimant(s) to claim 100% pattern footnote 1 of their tens of thousands they represent w/ up to date personal signatures to represent in this 2014 proceedings.

2<sup>ND</sup> cut checks proof of 2014 and prior Royalty payments amounts to their artists and record labels. Minus fees, administrative cost, lawyer fees, and other associated cost of their representation. Plus AARC own tax deduction to the IRS and their 1096 forms to IRS of Payments to claimants. Then their 1099 forms or W-2 to claimants of end year total Royalty Payments made (business records exception) as compliant.

**WHEREFORE**, in view of the foregoing accomplice liability, it is clear that AARC position is w/o authentic matter of record proof presented is baseless, w/o merit, and moot should be immediately dismissed from the 2014 DART SRF distribution proceedings. Requested no extension motion and or got consented approval by CGN INC. and other participants. Ecrb system was not established online to 2017 to appearance of fraud on the courts as stated in 11-24-19 opposition.

**Respectfully Submitted,**

**David Powell, Pro Se**

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**Proof of Delivery**

**I hereby certify that on November 29, 2019 a reply opposition true and correct copy of**

**Response in opposition motion to dismiss by AARC sent to the following:**

Linda R. Bocchi Esq AARC 701 N. Fairfax Street STE. 601 Alexandria, VA 22314

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Eugene Curry 4000 Gypsy Lane Philadelphia, PA 19129 [lambschopmusic@voicenet.com](mailto:lambschopmusic@voicenet.com)

**SIGNED: /s/ David Powell, Pro Se**

# Proof of Delivery

I hereby certify that on Friday, November 29, 2019, I provided a true and correct copy of the Reply To AARC Response in Opposition to CGN Motion To Dismiss AARC to the following:

Alliance of Artists and Recording Companies, represented by Linda R Bocchi, served via Electronic Service at lbocchi@aacroyalties.com

Eugene Curry Mr., represented by Eugene Curry Mr., served via Electronic Service at lambchopsmusic@voicenet.com

Signed: /s/ david powell