

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

**Distribution of Dart Royalty Funds
Publishers sub funds (MWF)**

**Docket No. 16-CRB-0013 DART
MWF 2012-2013 Publishers**

**Immediate Breach Counterclaim rebut to Joint Opposition settling parties False
Statements and Sham Exception 10-18-19 letter Sua Sponte Coercive Relief Damages
Granted**

Joint opposition reply was a sham exception pleading in coherent w/ false statements. Causation existed of introduction of simulated facts to mislead Judges decision. Based on other case decisions which has nothing to do with this MWF case. Secondly a Pro Se timely comment was filed in 2016 as matter of record, again Fraud on the Court Joint Opposition. Thirdly Circle God Network Inc. (members) d/b/a David Powell was not revisiting Judges prior approval as a falsely statements in 10-18-19 letter. But requesting the remaining 5% distribution from Judges.

Pro Se asserted Equitable and Judicial Estoppel substantial prejudice unless estoppel succeeds. A submission to a special findings of ultimate facts active fraudulent concealment repeated pattern. Clarity as Pro Se claimant how, why, and on the basis of Legal Prejudice motion for Coercive relief should be granted. Pro Se declaration proved up settling parties opposition fraud on the court Bursting bubble Theory. Presumption disappears once presumed facts have be contradicted by Pro Se credible corroborated evidence.

In conclusion, Joint opposition reply letter 10-18-19 fraud on the court lacks due diligence and is baseless, w/o merit, and moot. Lacks of legally sufficient evidentry basis for a fact finder Judges to rule in Joint Opposition Parties favor. A sham exception to harm all and any Pro Se (myself) Exclusion participant competition in Royalty Distribution Funds ever. A Anti Competitive conduct permanent Exclusion. Noerr Pennington Doctrine United Mine Workers vs. Pennington, 381 U.S. 657, 85 S.CT. 1585 (1965). A Crime Fraud Exception Clark vs. U.S., 289 U.S. 1, 53 S. CT. 465 (1933). A Wire and Mail Fraud to gain an economical advantage monopoly power. Thru false language and introduction of fabricated evidence faint and sham pleadings repeated actual and intrinsic fraud fraudulent misrepresentation.

Respectfully Submitted,

David Powell, Pro Se

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Proof of Delivery

I hereby certify that a true and correct copy reply rebut to 10-18-19 letter Joint Opposition was sent to the following:

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/s/ Samuel Mosenkis / JTC

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Signed:/s/ David Powell, Pro Se

Proof of Delivery

I hereby certify that on Sunday, October 20, 2019, I provided a true and correct copy of the IMMEDIATE BREACH COUNTERCLAIM REBUT TO JOINT OPPOSITION SETTling PARTIES FALSE STATEMENTS AND SHAM EXCEPTION 10-18-19 LETTER SUA SPONTE COERCIVE RELIEF DAMAGES GRANTED to the following:

Broadcast Music, Inc., represented by Joseph DiMona, served via Electronic Service at jdimona@bmi.com

The Harry Fox Agency LLC, represented by Stephen H. Block, served via Email

American Society of Composers, Authors and Publishers (ASCAP), represented by Sam Mosenkis, served via Electronic Service at smosenkis@ascap.com

SESAC, Inc., represented by Christos P Badavas, served via Electronic Service at cbadavas@sesac.com

Signed: /s/ david powell