

**Before the
COPYRIGHT ROYALTY JUDGES
The Library of Congress**

In the Matter of)	
)	
Distribution of the 2000-2003)	Docket No. 2008-2
Cable Royalty Funds)	CRB CD 2000-2003 (Phase II)
)	

**SETTLING DEVOTIONAL CLAIMANTS’ REPLY IN SUPPORT OF DISCLOSURE TO
THE JUDGES AND MOTION TO SUPPLEMENT THE ADMINISTRATIVE RECORD**

According to “Independent Producers Group,” a d/b/a of Worldwide Subsidy Group, LLC, “IPG has always been a participant in the 2000-2003 cable proceedings, and Multigroup Claimants has never been a participant in the 2000-2003 cable proceedings.” IPG’s Opposition at 2. This position is sustainable only if one were to believe that Worldwide Subsidy Group, LLC is a different entity from “Multigroup Claimants.” But, of course, we now know it to be false. According to “Multigroup Claimants,” it is merely another d/b/a of Worldwide Subsidy Group, LLC.

To be clear, Worldwide Subsidy Group’s potential misconduct is not only its failure to disclose that it has been acting in Multigroup Claimants’ name for more than two years. Rather, its misconduct includes its active deception of the Judges, the courts, and other parties by representing itself to be an entity separate from “Multigroup Claimants,” which it has long represented to be a separate sole proprietorship.

Even now, Worldwide Subsidy Group continues the “transparent subterfuge” of pretending that “Independent Producers Group” and “Multigroup Claimants” are separate “entities” (a persistent corruption of the use of the word “entity”), this time for the purpose of distancing “Independent Producers Group” in the 2000-03 proceedings from conduct by

“Multigroup Claimants” in the 2010-13 proceedings. *See Ruling and Order Regarding Objections to Cable and Satellite Claims*, No. 14-CRB-0010-CD (2010-13), No. 14-CRB-0011-SD (2010-13) (Oct. 23, 2017) at 7 (citing *Memorandum Opinion and Ruling on Validity and Categorization of Claims*, No. 2012-6 CRB CD 2004-09 (Phase II), 2012-7 CRB SD 1999-2009 (Phase II) (Mar. 13, 2015) at 13 n. 14). Through deception, however, it has made the subterfuge less “transparent.” The SDC’s motion to supplement the record restores some transparency.

As to why the misconduct is relevant in this proceeding, Worldwide Subsidy Group fails to grasp that the portion of funds designated for Worldwide Subsidy Group’s claimants in the parties’ settlement agreement does not belong to Worldwide Subsidy Group personally. Worldwide Subsidy Group is merely an agent. *See Memorandum Opinion and Ruling on Validity and Categorization of Claims*, No. 2012-6 CRB CD 2004-09 (Phase II), 2012-7 CRB SD 1999-2009 (Phase II) (Mar. 13, 2015) at 6-7. The funds belong to the claimants that Worldwide Subsidy Group has been found to represent.

Those funds are in the possession of the Copyright Office (or in the United States Treasury, under the Copyright Office’s direction), awaiting final authorization from the Judges for distribution. *See* 17 U.S.C. § 111(d)(2). The SDC came into possession of information concerning a deception by Worldwide Subsidy Group. Particularly in conjunction with false statements in Alfred Galaz’s bankruptcy petition, the deception is highly suggestive of a fraudulent conveyance, among other things. The deception almost certainly has not been disclosed to Worldwide Subsidy Group’s claimants, the rightful recipients of the funds, whose funds will soon be placed into the hands of an agent that the claimants might not have authorized if they been aware of all the facts.

The Judges are now aware of the deception and are better armed to make a prudent decision as to how best to discharge their statutory duty to administer the funds entrusted to their care, to ensure that they reach the rightful owners. The obligation of every party to make the Judges aware of deception is the very essence of “candor to the tribunal.” *See, e.g.*, D.C. R. Prof. Conduct 3.3(d) (“A lawyer who receives information clearly establishing that a fraud has been perpetrated upon the tribunal shall promptly take reasonable remedial measures, including disclosure to the tribunal to the extent disclosure is permitted by Rule 1.6(d).”).

January 24, 2020

Respectfully submitted,

SETTLING DEVOTIONAL CLAIMANTS

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Certificate of Service

I certify that on January 24, 2020, I caused a copy of the foregoing to be served on all parties registered to receive notice by eCRB by filing through the eCRB filing system.

 /s/ Matthew J. MacLean
Matthew J. MacLean

Proof of Delivery

I hereby certify that on Friday, January 24, 2020, I provided a true and correct copy of the Reply in Support of Disclosure to the Judges and Motion to Supplement the Administrative Record to the following:

Independent Producers Group (IPG), represented by Brian D Boydston, served via Electronic Service at brianb@ix.netcom.com

Signed: /s/ Matthew J MacLean