

# DMCA Takedown Notice

## Demand for Immediate Removal of Infringing Content & Notice of Fraudulent Commercial Activity

**To:**

Ubuy Legal Department  
legal@ubuy.com

**From:**

**Martin Ardino, Esq.**  
Legal Counsel for **David Holywood pen. Debra Quincy**  
**DontFuckWithDaddy.com – Rights Protection Division**  
Martin@dontfuckwithdaddy.com

### **Re: Unauthorized Use and Distribution of Copyrighted Work; Criminal-Level Fraud & Unlawful Profit Scheme**

I represent **David Holywood**, the copyright owner of the literary work “**Dirty Business (A Vigilante Justice Thriller)**”, which is enrolled in the Amazon KDP Select / Kindle Unlimited program and subject to strict digital exclusivity.

Your websites are displaying and attempting to sell unauthorized copies of this work at the following URLs:

1. <https://www.ubuy.dk/en/product/7T3BZ36UK-trinity-sisters-dirty-business>
2. <https://www.u-buy.com.au/product/T31LHKOFS-dirty-business-a-vigilante-justice-thriller-vigilante-business-series>

These listings reproduce copyrighted cover art, metadata, and other protected content **without authorization**.

Your actions constitute multiple violations of 17 U.S.C. §106, including:

- Unauthorized reproduction
- Unauthorized public display
- Unauthorized advertisement
- Unauthorized commercial exploitation

No license or permission has been granted to Ubuy, its affiliates, or any of its vendors.

Pursuant to 17 U.S.C. §512(c)(3), you are required to remove the infringing content **immediately**.

Jurisdiction-Specific References:

- **Australia (.com.au)** – Copyright Act 1968 (Cth), sections 36–115; Australian Consumer Law (misleading/deceptive conduct, section 18).
- **Denmark (.dk)** – Danish Copyright Act (Ophavsretsloven), sections 1–78; Consumer Protection Act.
- **United States** – 17 U.S.C. §§ 106, 501–506 (infringement, statutory damages, civil and criminal penalties).

**Implication:** You may be held liable under multiple jurisdictions for the same conduct, including civil damages, criminal penalties, and regulatory enforcement.

Beyond copyright infringement, my office has identified **serious indicators of fraudulent commercial activity**:

#### **A. 15× Inflated Pricing, Unlawful Profit Extraction:**

Your site advertises my client’s book at **approximately fifteen times the actual retail price on Amazon**.

This discrepancy *cannot* be attributed to legitimate reseller markup and raises serious concerns regarding:

- **Fraudulent misrepresentation,**
- **Unfair commercial practices,**
- **Deceptive pricing,** and
- **Illegal profiteering using copyrighted material you do not own.**

#### **B. The money you charge for the book:**

Given that Ubuy is not authorized to sell or distribute this book:

- **100% of proceeds retained by Ubuy (or its vendors) constitute unjust/illegal enrichment,**
- These profits are derived from **illegal use of copyrighted property,** and
- You may be liable for **disgorgement of profits** under U.S. and international copyright statutes.

#### **C. Pirated Copies Being Shipped:**

Because Ubuy has **no lawful access** to the book:

- No legitimate channel exists for you to obtain physical or digital copies.

- Any customer who receives a book would, by definition, be receiving a **pirated copy**.
- Shipping pirated books constitutes **criminal copyright infringement** in multiple jurisdictions.

If, on the other hand, customers receive *nothing*, the conduct constitutes **straightforward consumer fraud**.

Either scenario exposes Ubuy to severe civil and criminal liability.

You are now formally on notice. Continued infringement after receiving this DMCA notice may be treated as **knowing and willful misconduct**, subjecting Ubuy to:

- Statutory damages up to **\$150,000 per infringed work**,
- Actual damages and full disgorgement of profits,
- Injunctive relief,
- Attorneys' fees and litigation costs,
- Liability for consumer fraud and deceptive business practices,
- Possible criminal investigation where pirated goods are distributed.

Your knowledge of the infringement as of this notice significantly escalates your exposure.

You are required to **preserve** all documents, records, communications, vendor information, and transactional logs related to the infringing listings. Alteration or deletion of evidence after receipt of this notice constitutes **spoliation**, which carries further legal consequences.

I require, without delay:

1. Removal of the infringing content,
2. Written confirmation of removal,
3. Details of any sales already made (including revenue and vendor identity),
4. An explanation of how Ubuy acquired the materials used to create these listings, and
5. A written commitment to prevent future unauthorized postings.

Failure to comply will result in pursuit of all available remedies in the appropriate jurisdictions.

**Martin Ardino, Esq.**

Legal Counsel for David Holywood & pen. Debra Quincy  
**DontFuckWithDaddy.com, International Legal Affairs**

Martin@dontfuckwithdaddy.com