

FAX COVER

Personal and Confidential

TO: David Bryson Esq.

FROM: Matthew Couloute Jr.

DATE: October 27th, 2017

RE: **Bluehost Site - thefamilycourtcircus.com**

PAGES: 4

NOTES: Please feel free to contact me regarding the attached. Children are being hurt so please find the time to address this matter expeditiously. Thank you.

Matthew Couloute Esq.

October 27, 2017

David Bryson Esq.
Chief Legal Officer
Bluehost – Endurance International Group
10 Corporate Drive
Suite 300
Burlington, MA 01803

RE: Bluehost: **thefamilycourtcircus.com**

Dear Mr. Bryson:

My name is Attorney Matthew Couloute Jr. Pursuant to Bluehost "Acceptable Use Policy" Section 6, Prohibited Uses, I am writing to request that you *"immediately terminate without notice and without any refund" the subscribers account for the purposeful, blatant and malicious material breach of your Policies.* You should be on notice that this "blogger" Paul Boyne and his site "the Family Court Circus" has caused the bullying and physical injury to a minor child because of it's content. **THIS SITE LIST THE PRIVATE AND CONFIDENTIAL INFORMATION AND IMAGES OF ALLEGED VICTIMS OF SEXUAL ABUSE AND THEIR LAWFUL GUARDIANS AND PARENTS. EXPOITATION OF THE CHILDREN ON THIS SITE IS ACTIONABLE, REPREHENSIBLE AND SEVERELY DIMINISHES YOUR COMPANY NAME AND STANDING IN THE COMMUNITY IN VIOLATION OF YOUR POLICIES.** This Blog was recently removed from Wordpress for violation of their policies and was then moved to the current URL thefamilycourtcircus.com; purchased through Fast Domain and now hosted by Bluehost. This site violates the majority if not all of your Content Policies. **TO BE CLEAR, YOU ARE BEING PUT ON NOTICE THAT THE CONTENTS OF THIS SITE HAS DIRECTLY LEAD TO THE BULLYING AND PHYSICAL INJURY OF A MINOR CHILD AND THE VICTIMIZATION OF CHILDREN THAT WERE ALLEGEDLY SEXUALLY ABUSED. THE CONTENTS ARE IN CLEAR VIOLATION OF YOUR ACCEPTABLE USE POLICY.**

1. Child Safety: The site identifies children who are alleged victims of sexual assault, alleged incest and alleged pedophilia. This site post pictures of these children, gives their full names, addresses, parents telephone numbers, school records, make and model of vehicles their parents drive, their extracurricular activities and additional confidential information that is not public knowledge. As a result, the site creates a real and imminent safety risk for the children posted



found therein. Let me also be clear that in each and every case this blogger writes about there has been NO civil or criminal finding that a sexual assault, molestation or abuse has occurred. As a result, **CHILDREN ARE BEING LABELED VICTIMS OF INCEST AND PEDOPHILIA AND THEN PROMOTED TO THE PUBLIC. AGAIN FOR THE AVOIDANCE OF DOUBT, MINORS WHO ARE ALLEGED VICTIMS OF RAPE, CAN FIND THEIR NAME'S, CONFIDENTIAL INFORMATION/IDENTIFIERS, PICTURES, SCHOOL NAMES AND ADDRESSES, HOME ADDRESSES AND CONFIDENTIAL COURT PAPERS ALL PUBLISHED ON thefamilycourtcircus.com HOSTED BY BLUEHOST**

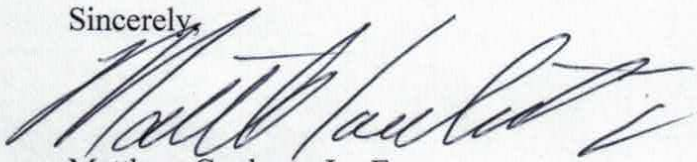
2. Hate Speech: The "core purpose" of this site has been and continues to be the singling out of individuals based on their race, ethnic origin, religion, gender, nationality and sexual orientation who are involved in the family court system. The use of the words "nigger", "cunt", "faggott" "Jew bitch", "nigger court", are only some of the hate speech and phrases that dominate the post and are deliberately used to incite people directly and indirectly to act violently against the individuals he writes about.
3. Crude Content: Erroneously alleging that someone is a pedophile or a victim of incest in and of itself is blatantly attempting to encourage readers to identify these individuals as social deviants and outcast and is solely done for the pure shock value. What's equally disturbing is that this blogger attempts to create the context by writing and publishing legal motions and briefs in cases that he is not involved with while making up facts, circumstances and events that haven't occurred.
4. Violence: Again, erroneously alleging that someone is a pedophile or a victim of incest in and of itself is blatantly attempting to encourage readers to identify these individuals as social deviants and outcast thereby encouraging and making them targets for violent acts. **More importantly, children that read this site are using the information to target other kids at school.**
5. Harassment: This site is truly meant to harass individuals. The blogger befriends women who have lost their children to fathers and attempts to get close to these women by harassing the fathers and trying to ruin their reputations thereby affecting the outcome of the family court litigation. In my case pending in Erie County, New York. The judge has entered an Order of Protection to protect the minor child and myself from this continued harassment. However, the harassment continues time and time again with the ongoing blog entries. The vast majority of the entries are about me, my children and Mr. William Grohs and his children. Both of us have won custody of our respective kids contrary to the ridiculously false allegations made on this site. It is just one piece of many actions taken by Mr. Boyne to harass my children and me. However, it is the most damaging to the

innocent children involved and their futures as they have been maliciously labeled raped victims and posted for the world to see.

6. Copyright: The names, images and likenesses of my children and me are being used without our prior permission or consent in violation of the Digital Millennium Copyright Act.
7. Personal and Confidential Information: My personal and confidential information is posted on this site. And, the personal and confidential information of my minor child is also posted on this site as well as others information. My driver's license (a full copy) with my license number, address and date of birth is posted on this Blog. Also, attached files including confidential medical reports and documents subject to the courts Order of Protection are also posted there. **Additionally, and most importantly, my minor child's school records including her current school, her name, date of birth, address, school schedule, teacher name and other personal identifiers are all listed.**

Candidly Mr. Bryson, in looking through your corporate officers and clearly seeing the quality of your company, I can't imagine you would want to be associated with this kind malicious, purposeful and blatant, bigotry that is harming innocent children. Regardless, thank you for your attention to this matter.

Sincerely,



Matthew Couloute Jr., Esq.
860.879.8951
Mattcouloute@gmail.com