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# Formal Complaint of Extortionate and Defamatory Conduct by Claimant Peter Chang

**Case No. 24-CCB-0232**

I am submitting this formal request to address what I believe to be a deliberate pattern of bad-faith conduct, civil extortion, defamation, and abuse of the CCB process by the Claimant, Peter Chang.

## Overview of Improper Conduct

On **June 18, 2025**, at approximately **4:15 PM Eastern Time**, the Claimant sent a private email directly to me, my father Dominick Mattiello, and co-respondent Raymond Harper. In this message, outside the scope of CCB procedures, he offered to withdraw both active CCB cases (**24-CCB-0232** and **24-CCB-0231**) in exchange for a personal financial settlement of either:

- $200,000 lump sum, or
- $220,000 payment plan ($100,000 down and $2,000/month for five years), secured by a property lien and facilitated by an escrow service.

He framed this offer as a way to resolve "all matters," including a $575,000+ state-level civil judgment issued solely against my father in a separate, unrelated case.

This communication is not only improper, it qualifies as civil extortion under **California Penal Code §§ 518–519**, as clarified in *People v. Beggs* (1918):

**Penal Code §§ 518 and 519**:

> **Penal Code § 518(a)** defines extortion as "the obtaining of property or other consideration from another, with his or her consent, induced by a wrongful use of force or fear."

**Penal Code § 519(a)(2)** and **(a)(3)** further defines this fear as including threats "[t]o accuse the individual… or their family of a crime" and "[t]o expose… any disgrace or crime."

Peter Chang's threats, made publicly in filings and privately via email, accused myself, my wife, my father, and Mr. Harper of criminal wrongdoing. Then, after those accusations were publicly rebutted with evidence, he attempted to extract a large personal payment by offering to make it all "go away."

This is textbook extortion, as reaffirmed by ***People v. Beggs* (1918) 178 Cal. 79**, which established that such conduct remains unlawful even if the party believes they're owed money. In addition to the extortionate nature of Mr. Chang's conduct under **California Penal Code §§ 518–519**, I believe it also raises serious concerns under federal law. Specifically, under **18 U.S. Code § 875(d)**, it is a federal offense to use interstate communications, such as email, to transmit threats or coercive demands for money. This is not a good-faith negotiation; it is coercion, and it violates both the spirit and the letter of CCB procedure as well as potential federal criminal statutes.

## Context and Timing of the Offer

What makes this even more egregious is the timing:

- Just **three hours prior**, the Claimant filed a document accusing myself, my wife, my father, and co-respondent Raymond Harper of **fraud, perjury, and forgery**.
- Just **one hour before** he sent his offer, I submitted a rebuttal that included factual clarifications and evidence directly disproving the foundation of his defamatory allegations.

This chain of events clearly shows that Mr. Chang, after seeing his narrative unravel, immediately pivoted to a backdoor financial settlement that exploits the very existence of this CCB litigation as leverage. This was never about copyright infringement. It is, and always has been, about using this forum to fish for discovery and assign blame where none exists.

## Additional Serious Concerns

The Claimant has now crossed multiple lines:

1. **Civil Extortion –** Leveraging active CCB cases to collect unrelated judgments is not only unethical, it may be legally actionable.
2. **Defamation –** His public filings name multiple innocent individuals as criminal fraudsters based purely on lay speculation, not expert verification.
3. **Process Abuse –** He is using the CCB as a discovery tool for prior civil cases, not for legitimate copyright enforcement.
4. **Suspected Misconduct** – The Claimant alluded in his filings, under **Docket #92 – Ex.AH**, to a package sent by my wife, claiming to know its contents. If this is true, this raises serious questions of mail interference or mail fraud, and I respectfully ask the Board to formally instruct the Claimant to explain how he obtained this information.

## Request for Action

In light of the above, I respectfully and urgently request that the Board:

1. **Issue sanctions** against the Claimant for bad-faith litigation tactics, abuse of process, and extortionate conduct.
2. **Censure the Claimant** for willful defamation against multiple unrelated parties.

3. **Require the Claimant to either formally dismiss his claims** (as his private email suggests he intends to do), or else require him to submit his reply testimony by **July 5, 2025**, or another date the Board deems appropriate per its rules.
4. **Open an inquiry into the Claimant's conduct**, especially regarding his mention of a package purportedly from my wife, as this may represent a violation of privacy or federal law.

The integrity of the CCB process must be preserved. The Claimant's actions, from reckless accusations to private coercive settlement offers, represent a clear and escalating abuse of that process. I trust the Board will act to prevent this proceeding from becoming a vehicle for harassment and personal financial gain under the guise of copyright protection.



Dominick Mattiello II

# Proof of Delivery

I hereby certify that on Wednesday, June 18, 2025, I provided a true and correct copy of the Formal Complaint of Extortionate and Defamatory Conduct by Claimant Peter Chang to the following:

Raymond Harper, represented by Raymond Harper, served via MANUALEEMAIL

Custom Family Gifts LLC, represented by Peter J Chang, served via ESERVICE at admin@customfamilygifts.com

Signed: /s/ Dominick Mattiello, II

# Proof of Delivery

I hereby certify that on Thursday, June 19, 2025, I provided a true and correct copy of the Formal Complaint of Extortionate and Defamatory Conduct by Claimant Peter Chang to the following:

Raymond Harper, represented by Raymond Harper, served via MANUALEEMAIL

Custom Family Gifts LLC, represented by Peter J Chang, served via ESERVICE at admin@customfamilygifts.com

Signed: /s/ Dominick Mattiello