Response to Request for findings of Bad Faith

The respondent Dominick Mattiello II (Mattiello II) was clearly identified as a proprietor of Etsy Shop TravelBuffs through addresses obtained from Etsy through federal subpoena. (See attached for unredacted versions of the Etsy subpoenaed information for both TravelBuffs–0232 and MapGala–0231). To date, the Mattiello party can offer no explanation for why Mattiello II's addresses were used in the registration of TravelBuffs.

Basic Subscriber Information for Etsy account "2r3cs2omvjxhczoh" (Shop Name: TravelBuffs)	
Username	2r3cs2omvjxhczoh
Shop Name	TravelBuffs
Join Date	2/18/22
Shop Create Date	2/18/22
Full Name(s)	Dominick Mattiello Raymond Harper
Address(es)	Raymond Harper 9130 Smoketree Drive JACKSONVILLE, FL 32244 United States Dominick Mattiello 379 Willow Green Drive ORANGE PARK, FL 32073 United States Dominick Mattiello 75 Summer Hill Court Richmond Hill, GA 31324 United States
Email Address(es)	mapprints@pm.me

Mattiello II since 2/17/2021

Second Mattiello II address

No explanation as to why MapGala chose to specifically use Dominick Mattiello Sr's address.

Basic Subscriber Information for Etsy account "j45d02wp1btth43l" (Etsy Shop: MapGala)	
Username	j45d02wp1btth43l
Shop Name	MapGala
Join Date	5/18/22
Shop Create Date	5/18/22
Full Name(s)	Dominick Mattiello Raymond Harper
Address(es)	Dominick Mattiello 9130 Smoketree Drive JACKSONVILLE, FL 32244 United States
Email Address(es)	etsytimberlands@gmail.com

No explanation as to why fragments of a known Mattiello II's address:

6041 Budd Inlet Loop, ***apt 3, Bremerton, WA***

appears in the 2019 shop, HeirloomPrints.

Basic Subscriber Information for Etsy account "mc5rsb1x" (Shop Name: HeirloomPrints)	
Username	mc5rsb1x
Shop Name	HeirloomPrints
Join Date	January 13, 2019
Shop Join Date	January 13, 2019
Full Name(s)	Dominick Mattiello
Address(es)	379 Willow Green Drive. Orange Park, Florida 379 Willow Green Drive, apt 3, Bremerton, WA
Email Address(es)	mapmentos@gmail.com
Phone Number(s)	Bremerton
Last Visit Date	June 23, 2021 (11:34:34 PM)
IP Address at Last Visit	76.195.44.88
Last Login Date	June 1, 2021
IP Address at Last Login	76.195.44.88
Account Status	Active

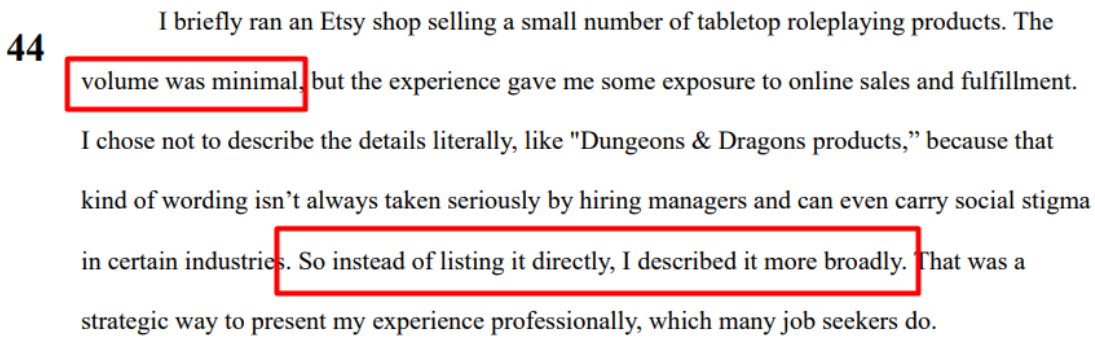
Mattiello II claims I made repeated false accusations "despite clear evidence in the record", citing "timeline documentation", which was not supplied as evidence until June 9th, 2025 (docket #169), months after discovery ended. No evidence relevant to the matter of identity was supplied by respondents until March 31st, 2025, the final day of discovery with the submission of the Myers Engagement Letter (docket #128). Given the serious nature of my allegations and

being specifically identified by Etsy registration as a proprietor of the shop, one cannot simply expect to be released from responsibility based on statements alone.

While the Myers Engagement Letter letter was recently verified to be authentic, that document contained serious issues such as lack of sequential pages, and use of unsecure pdf editing software (convert-jpg-to-pdf.net), rather than secure signing software such as Docusign or Adobe Acrobat and my pursuit to authenticate that document was warranted and in good faith.

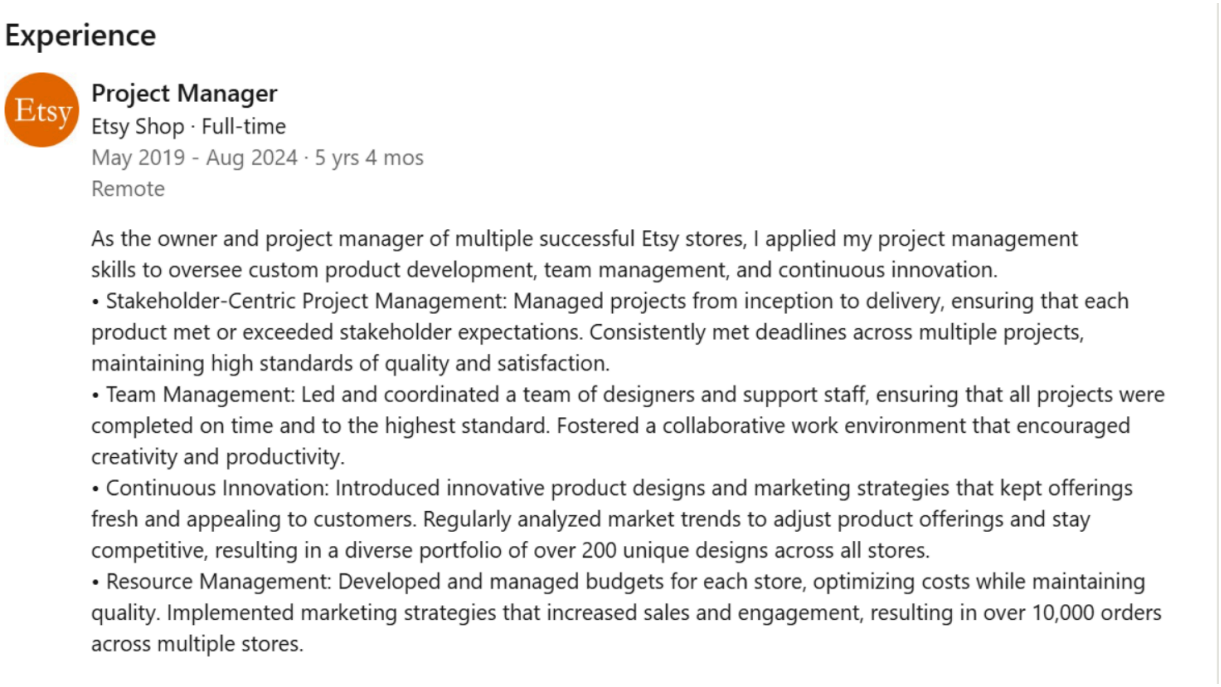
Through the verification of the engagement letter on June 30th, 2025, we learned Dominick Mattiello Sr (Mattiello Sr) improperly used his son's address, 379 Willow Green Drive, Orange Park, FL to retain The Myers Law Group and respond to the 2021 lawsuit. When the engagement with The Myers Law Group was terminated, the same improper address was provided as the continuing service address in the matter, before Mattiello Sr resorted to dodging service altogether as a strategy, resulting in a default judgment. This very basic information should have, and could have been provided through outreach of an attorney during that proceeding or following the judgment granted in 2023.

As referenced during a February 4th, 2025 pre-discovery conference Mattiello II made the claim that the LinkedIn capture referencing Etsy was relating to his "tabletop miniatures" shop. He elaborates further in his signed witness testimony docket #182:



44 I briefly ran an Etsy shop selling a small number of tabletop roleplaying products. The volume was minimal, but the experience gave me some exposure to online sales and fulfillment. I chose not to describe the details literally, like "Dungeons & Dragons products," because that kind of wording isn't always taken seriously by hiring managers and can even carry social stigma in certain industries. So instead of listing it directly, I described it more broadly. That was a strategic way to present my experience professionally, which many job seekers do.

While this narrative fits docket #81, a February 27th, 2025 capture of Mattiello II's LinkedIn:

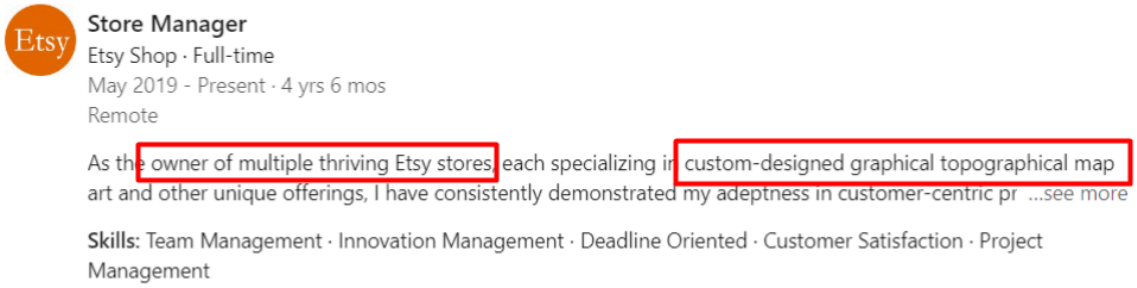


Experience

Project Manager
Etsy Shop · Full-time
May 2019 - Aug 2024 · 5 yrs 4 mos
Remote

As the owner and project manager of multiple successful Etsy stores, I applied my project management skills to oversee custom product development, team management, and continuous innovation.
• Stakeholder-Centric Project Management: Managed projects from inception to delivery, ensuring that each product met or exceeded stakeholder expectations. Consistently met deadlines across multiple projects, maintaining high standards of quality and satisfaction.
• Team Management: Led and coordinated a team of designers and support staff, ensuring that all projects were completed on time and to the highest standard. Fostered a collaborative work environment that encouraged creativity and productivity.
• Continuous Innovation: Introduced innovative product designs and marketing strategies that kept offerings fresh and appealing to customers. Regularly analyzed market trends to adjust product offerings and stay competitive, resulting in a diverse portfolio of over 200 unique designs across all stores.
• Resource Management: Developed and managed budgets for each store, optimizing costs while maintaining quality. Implemented marketing strategies that increased sales and engagement, resulting in over 10,000 orders across multiple stores.

Mattiello II's position of "Etsy shop selling …tabletop roleplaying products" is a gross contradiction to docket #84, an earlier capture of the same LinkedIn page from October 13th, 2023. The two captures were actually provided to demonstrate the editing of evidence after the fact (see 2023 version below). Explicitly this earlier version states he is the *"**owner** of multiple thriving Etsy stores, each specializing in **custom-designed graphical topographical map art**"*.



Store Manager
Etsy Shop · Full-time
May 2019 - Present · 4 yrs 6 mos
Remote

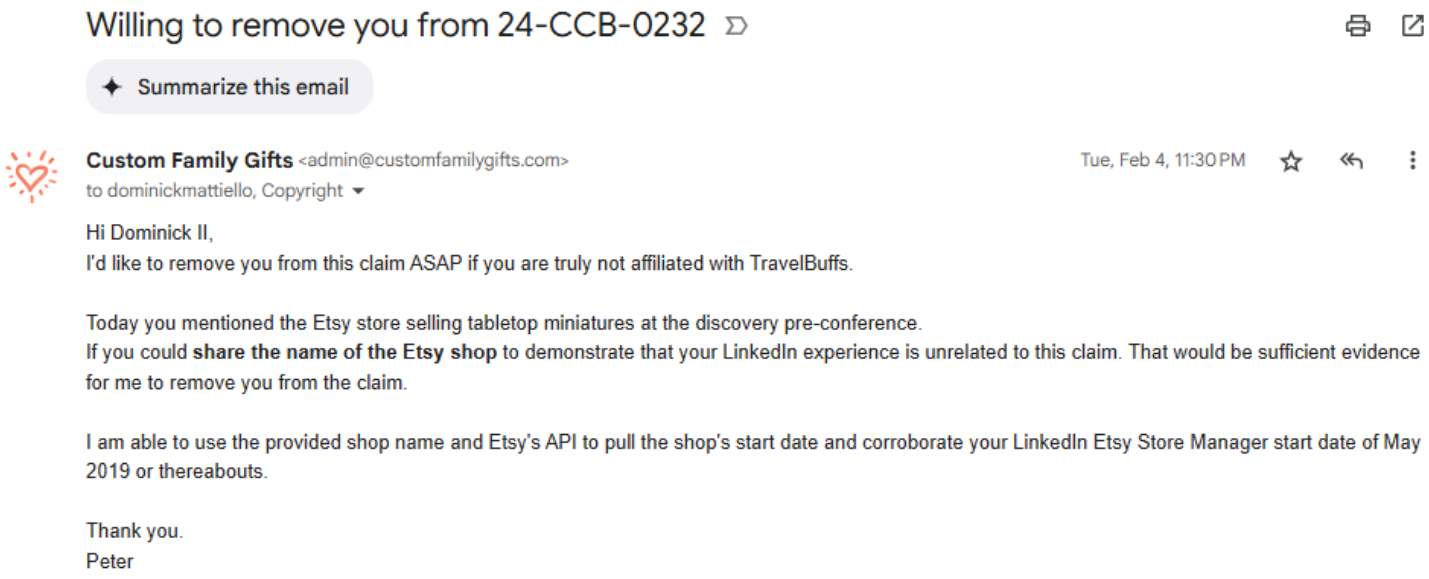
As the owner of multiple thriving Etsy stores, each specializing in custom-designed graphical topographical map art and other unique offerings, I have consistently demonstrated my adeptness in customer-centric pr ...see more

Skills: Team Management · Innovation Management · Deadline Oriented · Customer Satisfaction · Project Management

Whereas the edited version of the page removes references to topographical map art. No explanation was provided by Mattiello II as to why he would make such statements on LinkedIn about business he "has nothing to do with".

Additionally his witness testimony claims his Etsy experience is of "minimal volume" yet at the same time the LinkedIn evidence shows him touting results of *"over 10,000 orders across multiple stores".* The sum of orders for the known Mattiello related stores selling map related art is over 6,000, putting it in the neighborhood of the claims made on LinkedIn. It's likely Mattiello crafted this narrative to suit the 2025 LinkedIn evidence, failing to consider the 2023 version.

After our initial pre-discovery meeting I offered to drop Mattiello II from this case if he shared the name of this "tabletop" shop. An offer I was prepared to follow through with. However, to this very simplest of requests, he declined to be forthcoming with any information.



Willing to remove you from 24-CCB-0232

Summarize this email

Custom Family Gifts <admin@customfamilygifts.com> Tue, Feb 4, 11:30 PM

to dominickmattiello, Copyright

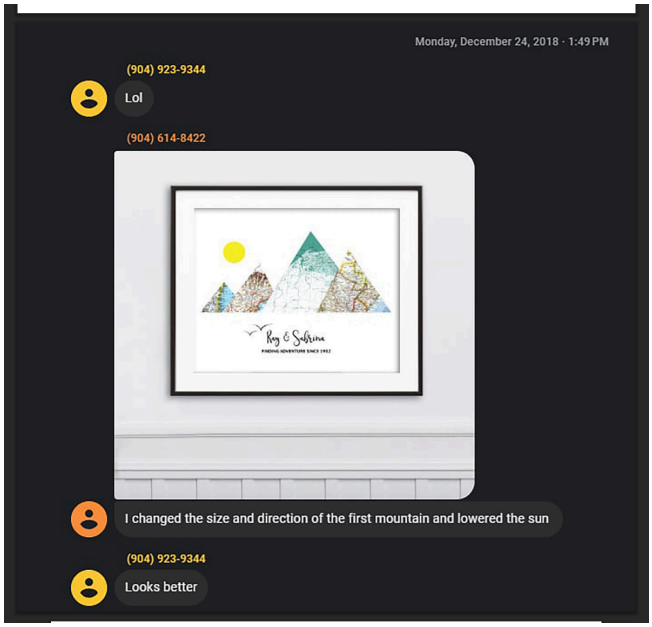
Hi Dominick II,
I'd like to remove you from this claim ASAP if you are truly not affiliated with TravelBuffs.

Today you mentioned the Etsy store selling tabletop miniatures at the discovery pre-conference.
If you could **share the name of the Etsy shop** to demonstrate that your LinkedIn experience is unrelated to this claim. That would be sufficient evidence for me to remove you from the claim.

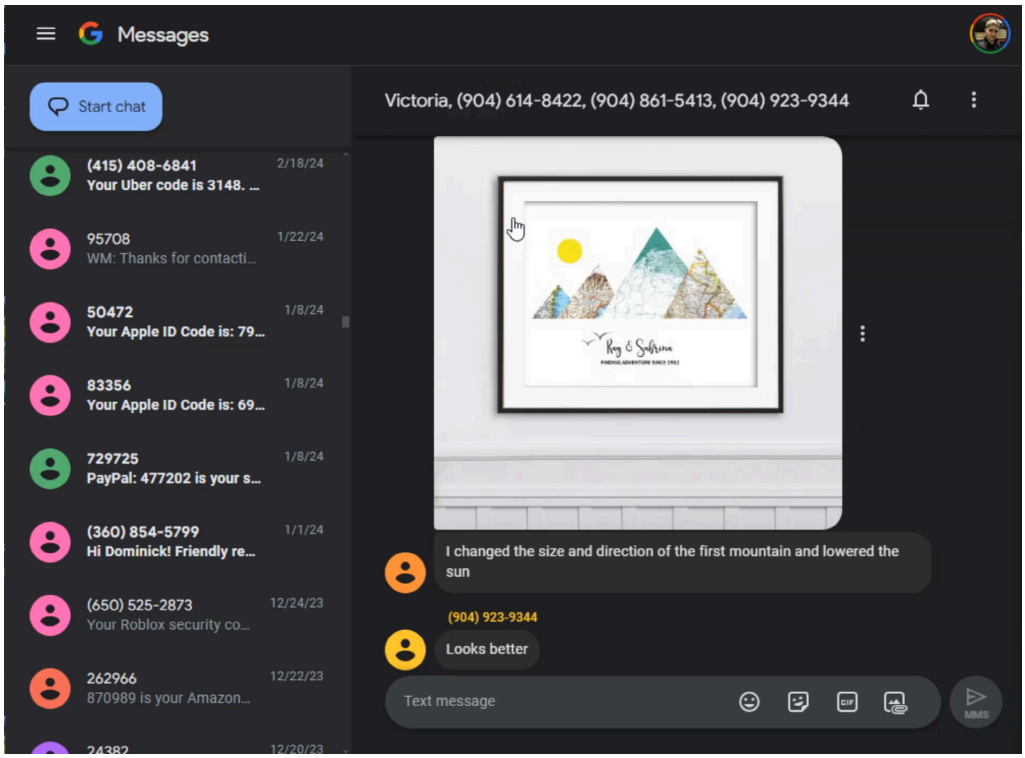
I am able to use the provided shop name and Etsy's API to pull the shop's start date and corroborate your LinkedIn Etsy Store Manager start date of May 2019 or thereabouts.

Thank you.
Peter

Evidence that was presented, such as docket #79, was cropped to remove his likeness and his wife's name and so severely lacking in context that it cannot be understood as a conversation:



Whereas the linked video (below) allowed me to see that his likeness and his wife's name were cropped out, demonstrating active concealment of information.



Similarly the Facebook message evidence (docket #146) is so severely lacking in basic context, nothing useful can be gleaned from it.

In my testimony, I included much Inclusion of evidence, including corroborating evidence that initial "self transactions" at the start of each store matched the personas that were identified. TravelBuffs, has an initial order shipped to Victoria Mattiello in Bremerton, Washington (docket #72).

0	0	49.95 USD	2.93E+09	1.17E+09	3/18/2022	3/20/2022	Victoria M	6041 Budd	Apt 3	BREMERTC WA
139.9										

While MapGala shows an initial order shipped to the 9130 Smoketree address (docket #109), consistent with Mattiello Sr's registration information provided by Etsy.

The amount of evidence I provided was not to "prove" any Mattiello entity's involvement, as being named in the registration information was sufficient enough cause to pursue him in this matter. Rather it was to demonstrate to the board that I had good reason, and corroborating evidence to continue my pursuit despite his protestations.

Mattiello II incorrectly assumes that the withdrawal of this claim demonstrates that it proves he was not the party responsible for the infringement. That is incorrect. The engagement letter only sheds light on the preceding federal case and resulting judgment. The balance of evidence collected for this case does not in my view paint the picture of an uninvolved party.

Regarding the claim of "extortion", I was granted a federal judgment against Dominick Mattiello in the amount of $2,524,902.44, which has accrued interest of over $575,000 to date. At the time of extending the settlement offer, Dominick Mattiello II was also named in an

ongoing CCB proceeding. It is well within my right, and more than reasonable, to offer a settlement of all matters for a mere $220,000.

In conclusion, the respondent's request for bad faith findings fundamentally mischaracterizes both the nature of this proceeding and my conduct throughout it. I initiated this claim based on concrete evidence obtained through federal subpoena showing Dominick Mattiello II's addresses directly associated with the TravelBuffs Etsy shop registration. This constituted a reasonable factual and legal basis for pursuing the claim.

Rather than engaging transparently with this evidence, respondent consistently provided incomplete, cropped, or contradictory documentation while demonstrably editing his LinkedIn profile to remove references to topographical map art businesses, contradicting his own sworn statements.

My decision to withdraw this proceeding was not an admission of lack of merit, or even that the wrong Mattiello was targeted, but rather a recognition that the process had become too complicated and unclear to proceed confidently—a reasonable litigation decision that does not constitute bad faith conduct.

I respectfully request that the Board deny his request and recognize that this proceeding was pursued with reasonable basis and in good faith throughout.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Peter Chang