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UNITED STATES COPYRIGHT CLAIMS BOARD

Ben Camacho Enterprises LLC,

Claimant,

v.

Eleven Public Affairs,

Respondent.

Docket No. 25-CCB-0108

REPLY WITNESS STATEMENT OF BEN CAMACHO

I, Ben Camacho, declare as follows based on my personal knowledge. Pursuant to 37 C.F.R. § 222.15(c)(2), this statement is limited to facts not included in my prior witness statement that contradict or rebut evidence submitted in Respondent's response testimony.

I. THE $1,000 LICENSE FEE PREDATES THIS PROCEEDING

1. On February 7, 2022, I issued a written invoice to NewSantaAna.com / Art Pedroza for the unauthorized use of the Work, stating a license fee of $1,000 as a line item separate from the infringement penalty. That invoice is in the record as Claimant's Exhibit V.

2. On November 4, 2024, before this proceeding was filed, I issued a written invoice to the Santa Ana Police Officers Association for the use of the Work at issue here, again stating a license fee of $1,000 as a line item separate from the penalty. That invoice is in the record as Claimant's Exhibit K.

3. The $1,000 license fee for the Work was therefore first put in writing in February 2022, more than two years before this proceeding existed. The supplemental interrogatory response Respondent quotes addressed whether I had advertised that fee on my website. It did not say, and it is not true, that I came up with the figure for this proceeding.

II. THE EXHIBIT DD AND EE INVOICES WERE BULK, MULTI-IMAGE SALES

4. The invoice at Claimant's Exhibit DD was a sale of five photographs in a single transaction in 2018, at the start of my career. The invoice at Claimant's Exhibit EE was a wholesale sale of nineteen photographs in a single transaction. Both prices reflect volume discounts for buying many images at once.

5. I have never licensed a single photograph for use in a paid advertisement for $50, and no such license appears in the record.

III. THE INSTAGRAM STORY WAS A PUBLIC DISAVOWAL

6. I posted the Instagram story at Claimant's Exhibit M to tell the public that I had nothing to do with SAPOA's political advertising. The advertisement used my Work without my knowledge or consent, my takedown notice went unanswered past its deadline, and the advertisement stayed up. The story said the use was unauthorized and that I had demanded removal and payment.

IV. THE WITNESS DESIGNATION OF JOHN KACHIRISKY

7. I identified John Kachirisky as a witness because, as SAPOA's president, he saw firsthand what SAPOA did with my takedown notice and invoice, and he knows what SAPOA hired and paid Respondent to do.

CERTIFICATION

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



Ben Camacho
Owner, Ben Camacho Enterprises LLC
Date: July 4, 2026

Proof of Delivery

I hereby certify that on Saturday, July 04, 2026, I provided a true and correct copy of the Reply Witness Statement of Ben Camacho to the following:

Eleven Public Affairs, represented by Carlos Madriles, served via ESERVICE at carlos@elevenpa.com

Signed: /s/ Ben Camacho