UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. CASE NO. 9:25-CV-80391-MIDDLEBROOKS

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Plaintiff,

v.

JURY TRIAL DEMANDED

DENNIS YU, individually and d/b/a BLITZMETRICS, and PARKER NATHANS, individually,

| Defendants. | |
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AMENDED COMPLAINT

Plaintiff, Lisa T. Miller ("Miller"), by and through her undersigned counsel, hereby files her Amended Complaint against Defendant Dennis Yu, individually and d/b/a Blitzmetrics (referred to herein as "Defendant" or "Yu/Blitzmetrics"). Miller alleges, on knowledge as to her own actions, and otherwise on information and belief, as follows:

PRELIMINARY STATEMENT

- 1. Miller files this lawsuit seeking preliminary and permanent injunctive relief, along with monetary damages, against Yu/Blitzmetrics for his blatant defamation and copyright infringement, and violations under the Florida Deceptive and Unfair Trade Practices Act. Additionally, Miller asserts claims against Yu/Blitzmetrics for violations under the Computer Fraud and Abuse Act as well as for Fraudulent Inducement, Fraudulent Misrepresentation, Negligent Misrepresentation, and Intentional Infliction of Emotional Distress.
- 2. Yu/Blitzmetrics falsely accused Miller of stealing \$10,000.00, publicly spreading these lies on LinkedIn, Facebook, and through an on-line blog post titled "How Lisa T. Miller

Stole \$10,000.00 From Our Team" and "How Lisa T. Miller Took \$10,000 From Our Team." Plaintiff published several other blog posts and social media posts, including a public video message to Miller on LinkedIn and X, wherein he lies, defames, and threatens Miller.

- 3. Yu/Blitzmetrics also unlawfully used Miller's copyrighted photograph (the "Copyrighted Work") in his defamatory blog posts even after being notified of the infringement and various hosting platforms removing the infringing blog posts when Yu/Blitzmetrics refused to do so, further compounding the harm to Miller's reputation and intellectual property rights.
- 4. Contrary to Defendant's false statements, Miller stole no monies. Yu/Blitzmetrics publicly and falsely accused Miller of stealing money following Miller's successful credit card dispute where the \$10,000.00 she paid Yu/Blitzmetrics for his misrepresented Are You Googleable Certification course was credited back to Miller by PNC Bank.
- 5. In retaliation for Miller's successful credit card dispute, Yu/Blitzmetrics is harassing, defaming, and subjecting Miller, a consumer of Yu/Blitzmetrics services, to unconscionable acts in an effort to get Miller to pay him money to stop his illegal activities.
- 6. Miller's initial Complaint against Yu/Blitzmetrics and Parker Nathans was filed on March 25, 2025 [DE 1]. On May 28, 2025, a Notice of Settlement between Miller and Nathans was filed with the Court as a result of a Confidential Settlement Agreement entered into between Miller and Nathans [DE 22]. On June 2, 2025, Miller filed a Notice of Voluntary Dismissal With Prejudice as to Nathans [DE 25], resulting in the Court entering an Order Terminating Defendant Nathans as a Defendant in this case on June 3, 2025 [DE 26].

JURISDICTION AND VENUE

- 7. This court has jurisdiction over this action pursuant to 28 U.S.C. § 1332, as there is diversity of citizenship among the parties and this action involves an amount in controversy in excess of \$75,000, excluding interest and costs. This court also has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1338(a), and pursuant to the principles of supplemental jurisdiction under 28 U.S.C. § 1367.
- 8. Venue is also proper in this district under 28 U.S.C. § 1391(b)(2), because a substantial part of the events or omissions giving rise to the claim occurred in this district; Yu/Blitzmetrics committed tortious acts and copyright infringement against Miller in Palm Beach County, Florida.
- 9. Yu/Blitzmetrics is subject to personal jurisdiction under Florida's Long Arm Statute. § 48.193, Fla. Stat. (2024).
- 10. In particular, Yu/Blitzmetrics has submitted himself to the jurisdiction of the courts in Florida because the causes of action asserted herein arise from at minimum the following acts:
 - a. "Operating, conducting, engaging in, or carrying on a business or business venture in this state or having an office or agency in this state." § 48.193(1)(a)1.,
 Fla. Stat. (2024).
 - a. "Committing a tortious act within this state." § 48.193(1)(a)2., Fla. Stat. (2024).
 - b. "Causing injury to persons or property within this state arising out of an act or omission by the defendant outside this state, if at or about the time of the injury, either: (a) The defendant was engaged in solicitation or service activities within this state; or (b) Products materials, or things processed, serviced, or manufactured by the defendant anywhere were used or consumed within this

- state in the ordinary course of commerce, trade, or use." § 48.193(1)(a)6., Fla. Stat. (2024).
- a. "Breaching a contract in this state by failing to perform acts required by the contract to be performed in this state." § 48.193(1)(a)7., Fla. Stat. (2024).
- 11. Further, Yu/Blitzmetrics is engaged in substantial and not isolated activity within this state and, therefore, is subject to the jurisdiction of the courts of this state. For example:
 - a. Yu/Blitzmetrics sent threatening emails to Miller who is located in Florida;
 - b. Yu/Blitzmetrics' websites (www.Blitzmetrics.com and www.DennisYu.com) are accessible in Florida; Yu/Blitzmetrics distributed his defamatory and infringing blog posts through his website to people in Florida; and the causes of action herein are derived directly from those contacts;
 - c. Yu/Blitzmetrics has numerous clients in the State of Florida;
 - d. Yu/Blitzmetrics collaborates and/or collaborated with other agencies, businesses or team members located in the State of Florida;
 - e. In April 2023, Yu/Blitzmetrics was a presenter at the "7 Figure Agency Intensive" in Miami, Florida;
 - f. In May 2023, Yu/Blitzmetrics was a speaker in Orlando, Florida at the DigMarCon Florida 2023 conference;
 - a. On April 6, 2024, Yu/Blitzmetrics met with Miller in Boca Raton, Florida, while there for another business meeting with one of his clients; and
 - In June 2024, Yu/Blitzmetrics was a speaker at the DigiMarCon Florida 2024
 Conference in Miami, Florida.

12. In fact, Yu/Blitzmetrics' contacts with the State of Florida are ongoing. For example, he will be in Florida for five (5) scheduled speaking events at the DigiMarCon conference in Miami, Tampa, Jacksonville, and Orlando, Florida from June through November 2025, including departing from Fort Lauderdale, Florida for DigiMarCon At Sea.

PARTIES

- 13. Plaintiff Miller is an individual who resides in Palm Beach County, Florida and is a citizen of the State of Florida. Miller is a successful, reputable businesswoman with over 33 years of experience in the healthcare industry. She is the visionary leader and founder of VIE Healthcare Consulting which was sold to Morgan Stanley Capital Partners in 2022.
- 14. Thereafter, Miller established a consulting business under her name Lisa T. Miller specializing in healthcare commercialization consulting where she advises professionals in the life sciences industry, offering strategies to transform their sales and marketing efforts. Miller's website address is www.LisaTMiller.com.
- 15. Defendant, Dennis Yu, is an individual doing business as Blitzmetrics and is a citizen of the State of Nevada.
- 16. Defendant, Dennis Yu, is very experienced with search engine optimization (SEO) and maximizing attention for businesses on-line using on-line tools and techniques, including backlinks. Yu touts himself as having spent a billion dollars on Google and Facebook ads for Nike, Quiznos, Ashley Furniture, Red Bull, State Farm, and other organizations.
- 17. Yu/Blitzmetrics provides Advanced Digital Marketing Training through his "Office Hours" program which includes access to all his courses, guides, Facebook groups, and webinars (hereinafter referred to as "Office Hours Program").

FACTUAL BACKGROUD

- 18. Miller's relationship with Yu/Blitzmetrics began in October 2023 when Miller enrolled in Yu/Blitzmetrics' Office Hours Program.
- 19. Miller paid Yu/Blitzmetrics \$297.00/month to participate in the Office Hours Program.
- 20. As part of the Office Hours Program, Miller attended group monthly coaching calls.
- 21. As part of the Office Hours Program, Yu/Blitzmetrics offered to help people in the group improve their respective website SEO for no additional charge.
- 22. In December 2023, Miller accepted Yu/Blitzmetrics' offer to enhance the SEO on her www.LisaTMiller.com website.
- 23. Miller provided Yu/Blitzmetrics with login credentials (a unique username and password) to access the backend of her website solely for the purpose of enhancing her website's SEO.
- 24. On January 31, 2024, Yu/Blitzmetrics informed Miller that the improvements and integrations to enhance her website's SEO were completed.
- 25. On February 24, 2024, Yu/Blitzmetrics offered Miller a private one-hour consultation for \$1,500.00 which Miller paid for on February 25, 2024, and the consultation took place on March 3, 2024.
- 26. For nine months (that is, from October 2023 through June 2024), Miller paid \$297.00 monthly to participate in Yu/Blitzmetrics' Office Hours Program, totaling \$2,673.00. These payments were in addition to the \$1,500.00 Miller paid for a one-hour consultation with Yu/Blitzmetrics.

27. On June 27, 2024, Miller cancelled her Office Hours Program subscription.

Defendant Yu/Blitzmetrics' Are You Googleable Certification Program

- 28. In or about February 2024, Miller heard about Yu/Blitzmetrics' Are You Googleable Certification Program ("AYG Program") and informed Yu/Blitzmetrics that she wanted to participate in the AYG Program.
- 29. Yu/Blitzmetrics advised Miller that the AYG Program was opening up soon and directed Miller to watch posts on Facebook for updates.
- 30. On or about May 9, 2024, Miller saw Yu/Blitzmetrics' Facebook post promoting the AYG Program for a \$10,000.00 participation fee and she emailed Yu/Blitzmetrics once again expressing her interest in participating in the program.
- 31. On May 10, 2024, Miller paid \$10,000.00 to participate in the AYG Program through Yu/Blitzmetrics' PayPal account using her PNC Bank credit card.
- 32. After paying for the AYG Program, Yu/Blitzmetrics invited Miller to attend what Miller understood was an AYG Program group training in Dallas, Texas.
- 33. Miller paid for her travel expenses to attend the training in Dallas, Texas, paid for her hotel accommodation, and paid for other associated expenses.
- 34. While in Texas, Miller discovered the other attendees had not paid anything for their participation and they were collectively building the AYG Program.
- 35. Contrary to Yu/Blitzmetrics' representations, the AYG Program was not fully developed when it was sold to Miller.
- 36. In fact, when Yu/Blitzmetrics sold the AYG Program to Miller, it was still being developed.

- 37. Yu/Blitzmetrics requested Miller's assistance with developing the AYG Program, including assistance with hiring virtual assistants. Initially, Miller agreed to assist; she was not compensated for her time.
- 38. When Miller learned that Yu/Blitzmetrics offered another AYG Program participant specific training, Miller requested to also receive the training either in a group setting with that participant or separately.
- 39. Yu/Blitzmetrics declined to set Miller up for training as part of the AYG Program.
- 40. On June 25, 2024, about six weeks after signing up to participate in the AYG Program, Miller expressed her dissatisfaction with the AYG Program directly and privately to Yu/Blitzmetrics, requesting that the \$10,000.00 she paid for the program be refunded by Yu/Blitzmetrics to her credit card.
 - 41. Yu/Blitzmetrics refused to refund the \$10,000.00 to Miller.
- 42. Despite Miller's repeated efforts and willingness to compromise on the refund amount for the sake of peace, Yu/Blitzmetrics and Miller were not able to agree upon the sum to be refunded.

Plaintiff Miller's Credit Card Dispute

43. Given the misleading nature of the AYG Program's promotion, the discrepancies between what was promised and what was delivered, and Yu/Blitzmetrics' refusal to issue a refund, Miller disputed the credit card charge and sought a full refund of the \$10,000.00 she paid for the AYG Program. At around the same time Miller disputed the credit card charge, she also filed a complaint with the Office of Attorney General in California; she filed the complaint in California because she had a California address for Yu/Blitzmetrics.

- 44. On June 26, 2024, Miller first disputed the credit card charge for Yu/Blitzmetrics' AYG Program with PayPal.
- 45. However, PayPal directed Miller to address the matter directly with PNC Bank as Miller used her PNC Bank credit card to make the \$10,000.00 payment.
- 46. Thereafter, Miller disputed the \$10,000.00 she paid for the AYG Program with PNC Bank.
- 47. After Miller submitted evidence to PNC Bank substantiating Yu/Blitzmetrics' misrepresentation of the AYG Program, Yu/Blitzmetrics provided his response to PNC Bank.
- 48. On September 12, 2024, after Miller received a copy of the response Yu/Blitzmetrics' submitted to PNC Bank, Miller again reached out to Yu/Blitzmetrics in another good faith attempt to amicably resolve the dispute but to no avail.
- 49. On or about October 9, 2024, Miller received notice from PNC Bank that she prevailed on the credit card dispute, resulting in PNC Bank refunding the \$10,000.00 she paid for the misrepresented AYG Program.

Yu/Blitzmetrics' Unlawful and Retaliatory Actions

- 50. Following PNC Bank's finding that Miller was entitled to receive full credit of the \$10,000.00 she paid for the AYG Program, in an attempt to get Miller to pay Yu/Blitzmetrics money and to destroy Miller's reputation and cause her damage personally and professionally, Yu/Blitzmetrics has engaged in and continues to engage in unlawful, malicious, and damaging conduct directed at Miller.
- 51. Upon information and belief, when a consumer of Yu/Blitzmetrics' services or any third party is dissatisfied with or challenges his actions or inactions, Yu/Blitzmetrics' modus

operandi is to engage in defamatory and harassing conduct in an intentional effort to cause the party damage and extort payment.

- 52. In fact, Yu/Blitzmetrics wrote an article dated December 8, 2022, titled "How to Rank on Anyone's Name" (hereinafter, "December 8th Article"). *See* December 8th Article (https://blitzmetrics.com/how-to-rank-on-anyones-name/), a copy of which is attached hereto as Exhibit 1.
- 53. In the opening paragraph of the December 8th Article, Yu/Blitzmetrics stated: "Ranking in digital marketing typically refers to the position at which a website or webpage appears in the search engine results pages (SERPs) for specific keywords or search queries. When someone searches for a particular term, search engines like Google display a list of relevant websites, videos, and other content ranked in order of perceived relevance and authority."
- 54. Yu/Blitzmetrics further explains in the December 8th Article how to "destroy someone's name" and in the "Conclusion" section states "ranking on a person's name in digital marketing can significantly impact personal branding, reputation management, and professional growth."
- 55. Yu/Blitzmetrics admits that the point of his defamatory blog post was "to rank on Lisa T. Miller's name and show others the kind of behavior she has towards businesses she works with. If you're planning on working with Lisa, be aware that this is how she operates and don't expect her to be reliable or trustworthy." See Exhibit 2, First Defamatory Blog at p. 12 (emphasis added).

Yu/Blitzmetrics' Unauthorized Attempt to Access Miller's Website

- 56. On October 26, 2024, four months after Miller had severed her business relationship with Yu/Blitzmetrics, Yu/Blitzmetrics without authorization and for no good reason attempted to improperly access Miller's website.
- 57. In this regard, Yu/Blitzmetrics emailed his team members Parker Nathans ("Nathans") and Felix Fagbuyi ("Felix"), a virtual assistant in the Philippines, stating "time to fix this site?"
- 58. Miller was inadvertently copied on an email by Felix, tipping her off to what was going on and, thereafter, Miller sent a cease-and-desist email to Yu/Blitzmetrics, Nathans and Felix.
- 59. As Miller had previously removed Yu/Blitzmetrics' authorization to access the backend of her website, they were unable to "fix this site" as nefariously stated in the email that Miller was never supposed to see.

Yu/Blitzmetrics' November 2024 Defamatory Comment on LinkedIn

- 60. On March 13, 2025, Miller learned that in or about November 2024, Yu/Blitzmetrics posted a false and libelous comment about Miller on LinkedIn.
- 61. In particular, in a comment to a third-party company's LinkedIn post announcing Miller joined its team as a Chief Commercial Officer ("Miller Announcement Post), Yu/Blitzmetrics stated "this is one that stole \$10k from us" ("Defamatory LinkedIn Comment"). A copy of the LinkedIn post including the Defamatory LinkedIn Comment is attached hereto as Exhibit 3.

- 62. The referenced third-party company is active on LinkedIn with 2,354 followers as of March 23, 2025, all of which could see Yu/Blitzmetrics' Defamatory LinkedIn Comment. Because the third-party company had tagged Miller in its announcement, all of Millers' more than 10,000 followers could also see the Defamatory LinkedIn Comment. In addition, Yu/Blitzmetrics' more than 43,000 followers could see his Defamatory LinkedIn Comment.
- 63. In April 2025, the referenced third-party company removed the Miller Announcement Post including Yu/Blitzmetrics' Defamatory LinkedIn Comment from its LinkedIn page.

Yu/Blitzmetrics' November 14, 2024 Defamatory Blog Post

- 64. On November 14, 2024, Yu/Blitzmetrics published a blog on his website titled "How Lisa T. Miller Stole \$10,000 From Our Team" ("First Defamatory Blog") so that anyone searching Lisa T. Miller's name on-line could see the First Defamatory Blog. *See* First Defamatory Blog, https://blitzmetrics.com/how-lisa-t-miller-stole-10000-from-our-team/, a true and accurate copy of which captured on or about March 14, 2025, is attached hereto as Exhibit 2. A true and accurate copy of the screenshot captured with a link to the First Defamatory Blog which appears when Lisa T. Miller's name was searched on or about March 10, 2025, using GOOGLE is attached hereto as Exhibit 4.
- 65. On or about February 26, 2025, Miller became aware of the First Defamatory Blog through a colleague with whom she previously worked.
- 66. Upon becoming aware of the First Defamatory Blog, Miller immediately sent Yu/Blitzmetrics a demand to remove the false and defamatory statements about her as well as the unauthorized publication of her private emails, and to stop making any further false claims or publishing private communications.

- 67. Yu/Blitzmetrics refused to take the First Defamatory Blog down.
- 68. In fact, Millers efforts to stop Yu/Blitzmetrics from continuing to defame her have been met with an escalation of defamatory and unconscionable, harassing actions and copyright infringement by Yu/Blitzmetrics.
- 69. In the First Defamatory Blog (and subsequent versions of it as plead below), in addition to falsely accusing Miller of stealing \$10,000.00, Yu/Blitzmetrics pieced together private communications between Miller and Yu/Blitzmetrics with distorted and untrue commentary and incomplete facts in such a way that a reasonable person reading the First Defamatory Blog could be left with the untrue impression: that Miller scammed Yu/Blitzmetrics and the people who work with him out of money; that Miller did not pay for services provided by Yu/Blitzmetrics; that Miller is not reliable or trustworthy; that Miller is unreasonable and belligerent; that Miller does not abide by rules; and an overall negative impression of Miller.
- 70. Yu/Blitzmetrics' actions were done and continue to be done in an attempt to coerce Miller to pay him thousands of dollars to take down the defamatory blog posts which Defendant Yu/Blitzmetrics knew would cause damage to Miller's reputation and be very troubling and disturbing to Miller.

Plaintiff Miller's Copyrighted Work

71. In the First Defamatory Blog, Yu/Blitzmetrics included a copyrighted photograph of Miller ("Copyrighted Work") at the top of the blog post as well as within the body of the blog post where a screenshot of Miller's website containing the Copyrighted Work is included; Yu/Blitzmetrics had no right or authorization to use the Copyrighted Work or a page from Miller's website. *See* First Defamatory Blog, page 1 and page 12, attached hereto as Exhibit 2.

- 72. In August 2018, photographer Julia C. Wagner ("Photographer") took the photograph of Miller. As a result, Photographer was the original owner(s) of any and all rights in the Copyrighted Work. Thereafter, Miller and Photographer entered into an agreement pursuant to which Photographer assigned/sold to Miller all copyright rights in the Copyrighted Work. A true and correct copy of the Copyrighted Work is attached hereto as Exhibit 5. A true and correct copy of the Copyright Transfer Agreement is attached hereto as Exhibit 6.
- 73. On August 21, 2018, Miller published and displayed the Copyrighted Work in the United States on her website www.LisaTMiller.com, on her LinkedIn page, and her YouTube channel, among other places. This publication has been a tremendous success as Miller is a highly sought after professional and the subject photograph is the primary image used by Miller on-line to develop her brand.
- 74. The Copyrighted Work is original, and Miller is the exclusive owner of all rights, title, and interest, including all rights under copyright, in the Copyrighted Work.
- 75. Miller obtained an expedited copyright registration of the Copyrighted Work after learning about the First Defamatory Blog wherein the Copyright Work was published and reproduced by Yu/Blitzmetrics without authorization from Miller.
- 76. The copyright claim asserted herein arises out of and is based on Yu/Blitzmetrics' copying, reproduction, distribution, and public display of the Copyrighted Work without Miller's consent. Miller sues for copyright infringement under the United States Copyright Act of 1976, as amended (the "Copyright Act"), 17 U.S.C. § 101 et seq.
- 77. Miller is the owner of valid and subsisting United States Copyright Registration No. VA 2-436-673 for the Copyrighted Work, issued by the United States Copyright Office on

March 10, 2025, with an effective date of March 5, 2025. Attached as Exhibit 7 is a true and accurate copy of the Certificate of Registration.

Plaintiff Miller's DMCA Take Down Requests¹

- 78. On or about March 18, 2025, Miller initiated a DMCA Take Down Request with WP Engine ("WP Engine Take Down Request"), the company hosting Yu/Blitzmetrics' website www.blitzmetrics.com, based on copyright infringement, requesting that the First Defamatory Blog be taken down.
- 79. On or about March 18, 2025, Yu/Blitzmetrics received notice of the WP Engine Take Down Request from WP Engine.
- 80. Instead of ceasing use of the infringing Copyrighted Work and taking the First Defamatory Blog down, Yu/Blitzmetrics made a mockery of the WP Engine Take Down Request and further exploited Miller's Copyrighted Work by including a joker hat, glasses, clown nose, and name tag on the Copyrighted Work infringed at the top of the Second Defamatory Blog. A true and accurate copy of the revised Second Defamatory Blog captured on March 19, 2025, is attached hereto as Exhibit 8.
- 81. Miller thereafter initiated her Second DMCA Take Down Request with WP Engine, requesting that the Second Defamatory Blog be taken down due to copyright infringement.
- 82. Yu/Blitzmetrics then changed the title of the blog post from "How Lisa T. Miller Stole \$10,000 From Our Team" to "How Lisa T. Miller Took \$10,000 from Our Team" and refused to take the Second Defamatory Blog down despite WP Engine's request that he do so,

¹ A Digital Millennium Copyright Act (DMCA) take down request is a document that informs a service provider (like a website hosting company or social media platform) that certain content they host is infringing on a copyright holder's intellectual property rights.

resulting in WP Engine taking down the Second Defamatory Blog on or about April 3, 2025 from Yu/Blitzmetrics' website www.blitzmetrics.com.

- 83. On or about May 20, 2025, Yu/Blitzmetrics again published the Copyrighted Work as part of a newly posted defamatory blog ("Third Defamatory Blog), a copy of which is attached hereto as Exhibit 9.
- 84. Thereafter, Miller initiated her Third DMCA Take Down Request with WP Engine based on copyright infringement related to the Third Defamatory Blog, resulting in WP Engine taking down the Third Defamatory Blog from Yu/Blitzmetrics' website www.blitzmetrics.com.
- 85. In addition, following receipt of the initial WP Engine Take Down Request, on or about March 19, 2025, Yu/Blitzmetrics created a Facebook post on his Blitzmetrics Facebook page where the modified Copyrighted Work was published along with a link to the Second Defamatory Blog ("Infringing Facebook Post"). A true and accurate copy of the referenced Facebook post is attached hereto as Exhibit 10.
- 86. Thereafter, Miller initiated a DMCA Take Down Request with Facebook. Yu/Blitzmetrics refused to take down his Infringing Facebook Post, resulting in Facebook taking down the Infringing Facebook Post on or about April 8, 2025.
- 87. The Infringing Facebook Post titled "How Lisa T. Miller Stole \$10,000 From Our Team" with the first sentence of the copy on the post stating, "How Lisa T. Miller, Founder of VIE Healthcare Consulting, cost our team \$10,000," is now once again visible on Blitzmetrics' Facebook page which has 14,000 followers as of June 5, 2025. A copy of the Infringing Facebook Post dated March 19, 2025, is attached hereto as **Exhibit** 10; see also https://www.facebook.com/BlitzMetrics/posts/pfbid0239xbY9MzyuXHcFtDDoPmhjQLD4D2pz VrXsts36qg9dd6tHcYwNqFpaqDKGjVZvZRl.

- 88. Although WP Engine removed Yu/Blitzmetrics' copyright infringing blogs from Blitzmetrics' website, the link to the taken down blogs still appeared in a Google search of Lisa T. Miller's names along with the Copyrighted Work appearing in the search results; thus, Miller initiated a DMCA Take Down Request with Google. Ultimately, Google did what was necessary so that the Copyright Work would not appear in Google searches associated with Yu/Blitzmetrics' unauthorized use.
- 89. Yu/Blitzmetrics' use of the Copyrighted Work and/or portions thereof is without Miller's authorization, consent, or knowledge, and without any compensation to Miller.
- 90. Yu/Blitzmetrics continues to infringe the Copyrighted Work despite being put on notice.
- 91. Yu/Blitzmetrics' identical copying and exploitation of portions of the Copyrighted Work was willful, and in disregard of, and with indifference to, the rights of Miller.
- 92. Yu/Blitzmetrics' intentional, infringing conduct was undertaken to reap the benefit and value associated with the Copyrighted Work in that it made clear that the Lisa T. Miller referred to in the First Defamatory Blog, Second Defamatory Blog, Third Defamatory Blog, and the Infringing Facebook Post is Plaintiff Miller.
- 93. By failing to obtain Miller's authorization to use the Copyrighted Work or to compensate Miller for the use, Yu/Blitzmetrics have avoided payment of license fees and other financial costs associated with obtaining permission to exploit the Copyrighted Work, as well as the restrictions that Miller is entitled to and would place on any such exploitation as conditions for Miller's permission, including the right to deny permission altogether.

- 94. As a result of Yu/Blitzmetrics' actions described above, Miller has been directly damaged, and is continuing to be damaged, by the unauthorized reproduction, publication, distribution, and public display of the Copyrighted Work or portions thereof.
- 95. Yu/Blitzmetrics has not paid Miller for his use of the Copyrighted Work or portions thereof.
- 96. Yu/Blitzmetrics' actions are causing, and unless restrained, will continue to cause damage and immediate irreparable harm to Miller for which Miller has no adequate remedy at law.

Yu/Blitzmetrics' Published an Unconscionable, Harassing, Defamatory Video Message to Miller

97. On or about April 3, 2025, Yu/Blitzmetrics published on his X and YouTube social media platforms a public, disingenuous, untruthful, slanderous and threatening video message directed to Miller about her initial Complaint filed against Parker Nathans and Yu/Blitzmetrics intended to cause damage to Miller's personal and professional reputation and even going so far as to threaten Miller's counsel about the impact on her reputation of representing Miller in what Yu/Blitzmetrics refers "frivolous ("Video Message"). to case" See as https://x.com/dennisyu/status/1907657976212762861;

https://www.linkedin.com/posts/dennisyu_i-just-found-out-that-lisa-t-miller-is-suing-activity-7313422242430795777-

 $ERfb?utm_source=social_share_send\&utm_medium=member_desktop_web\&rcm=ACoAAAK\\ YVd4BzJWqsgCqVXKs0l-gLVccXqOzRu8.$

98. On May 6, 2025, Yu/Blitzmetrics' posted the Video Message on YouTube. *See* https://www.youtube.com/watch?v=Xt3MouvAIo8&t=1s.

More Unconscionable, Harassing and Defamatory Blog Posts Published by Yu/Blitzmetrics

- 99. In May 2025, Yu/Blitzmetrics published and/or posted (on his social media platforms) the following unconscionable, harassing and defamatory blog posts containing lies, and distortions of what really happened:
 - a. Posted May 20, 2025: "How Lisa T. Miller Took \$10,000 From Our Team". See https://dennisyu.com/how-lisa-t-miller-took-10000-from-our-team/, a copy of which is attached hereto as Exhibit 11;
 - b. Posted May 22, 2025: "The Court Tossed Lisa T. Miller's Lawsuit and Gave Her One Last Chance". Yu/Blitzmetrics modified the content in this post on May 27, 2025. Also, on the bottom of this blog post, it states "How Lisa T. Miller Stole \$10,000 From Our Team." *See* https://blitzmetrics.com/the-court-tossed-lisa-t-millers-lawsuit-and-gave-her-one-last-chance/, a copy of which captured on June 6, 2025, is attached hereto as Exhibit 12.
 - c. Posted May 22, 2025: "Lisa T. Miller Files a YouTube Privacy Complaint to Silence the Truth". See https://dennisyu.com/lisa-t-miller-files-a-youtubeprivacy-complaint-to-silence-the-truth/, a copy of which printed on June 6, 2025, is attached hereto as Exhibit 13.
 - d. Posted May 22, 2025: "Lisa T. Miller sued me in federal court. The judge threw it out and gave her one last chance. She's not just wasting money she's torching her reputation in public. A fool with money is still just a fool." See https://x.com/dennisyu/status/1925742688634024095, a copy of which printed on June 6, 2025, is attached hereto as Exhibit 14.

- e. Posted May 22, 2025: "Why Lisa T Miller would want to wreck Vie Healthcare Consulting's reputation, too, is beyond me" including a link to his May 22, 2025, blog post on Blitzmetrics' website. *See* https://x.com/dennisyu/status/1925742921652793523, a copy of which printed on June 6, 2025, is attached hereto as Exhibit 15.
- f. Posted May 23, 2025: "Lisa T. Miller Keeps Trying to Silence Us with DMCA Abuse Claims". *See* https://dennisyu.com/lisa-t-miller-keeps-trying-to-silence-us-with-dmca-abuse-claims/, a copy of which printed on June 6, 2025, is attached hereto as Exhibit 16.
- g. Posted May 27, 2025: "The Court Tossed Lisa T. Miller's Lawsuit and Gave Her one Last Chance". *See* https://dennisyu.com/the-court-tossed-lisa-t-millers-lawsuit-and-gave-her-one-last-chance/, a copy of which printed on June 6, 2025, is attached hereto as Exhibit 18.
- h. Posted May 29, 2025: "Lisa T. Miller's Case Against Parker Nathans Ends in Silence". *See* https://dennisyu.com/lisa-t-millers-case-against-parker-nathans-ends-in-silence/, a copy of which is attached hereto as Exhibit 18.
- 100. The ongoing public attacks by Yu/Blitzmetrics as set forth herein, have caused Miller significant emotional distress, including episodes of anxiety, sleep loss, stress-induced headaches, interference with her professional responsibilities, mental exhaustion, disturbance of peace of mind, and a substantial disruption to Miller's daily life.
- 101. In addition, as a direct result of Yu/Blitzmetrics' actions to intentionally destroy Miller's reputation, Miller has incurred medical expenses, expenses associated with retaining a reputation management company, and attorneys' fees and costs.

COUNT I Copyright Infringement, 17 U.S.C. § 501

- 102. Plaintiff Miller repeats and realleges paragraphs 1 through 101, as if fully set forth herein.
- 103. The Copyrighted Work is an original photograph of Miller containing copyrightable subject matter for which copyright protection exists under the Copyright Act, 17 U.S.C. § 101, et. seq.
- 104. Miller is the exclusive owner of rights under copyright in and to the Copyrighted Work. Miller owns a valid copyright registration for the Copyrighted Work, attached as Exhibit 7.
- 105. Through Yu/Blitzmetrics' conduct alleged herein, including Yu/Blitzmetrics' reproduction, distribution, and public display of the Copyrighted Work or portions thereof without Miller's permission, Yu/Blitzmetrics has directly infringed Miller's exclusive rights in the Copyrighted Work in violation of Section 501 of the Copyright Act, 17 U.S.C. § 501.
- 106. On information and belief, Yu/Blitzmetrics' infringing conduct alleged herein was and continues to be willful and with full knowledge of Miller's rights in the Copyrighted Work, and has enabled Yu/Blitzmetrics illegally to obtain profit therefrom.
- 107. As a direct and proximate result of Yu/Blitzmetrics' infringing conduct alleged herein, Miller has been harmed and is entitled to damages in an amount to be proven at trial.
- 108. Pursuant to 17 U.S.C. § 504(b), Miller is also entitled to recovery of Yu/Blitzmetrics profits attributable to Yu/Blitzmetrics infringing conduct alleged herein, and an accounting of and a constructive trust with respect to such profits.
- 109. Alternatively, Miller is entitled to the maximum statutory damages pursuant to 17 U.S.C. § 504(c), in the amount of \$150,000 for Yu/Blitzmetrics' willful infringing conduct, and for such other amount as may be proper pursuant to 17 U.S.C. § 504(c).

- 110. Miller further is entitled to its attorneys' fees and costs pursuant to 17 U.S.C. § 505.
- 111. As a direct and proximate result of Yu/Blitzmetrics infringing conduct alleged herein, Miller has sustained and will continue to sustain substantial, immediate, and irreparable injury, for which there is no adequate remedy at law.
- 112. On information and belief, unless Yu/Blitzmetrics' infringing conduct is enjoined by this Court, Yu/Blitzmetrics will continue to infringe the Copyrighted Work. Miller therefore is entitled to preliminary and permanent injunctive relief restraining and enjoining Yu/Blitzmetrics' ongoing infringing conduct.

COUNT II Defamation Per Se

- 113. Plaintiff Miller repeats and realleges paragraphs 1 through 70 and 97 through 101 hereof, as if fully set forth herein.
- 114. Yu/Blitzmetrics' false written statements charge Miller with committing a crime in that the theft of \$10,000 is a felony in the State of Florida.
- 115. In particular, Yu/Blitzmetrics published blog posts on the internet for the public to see, with the following titles: "How Lisa T. Miller Stole \$10,000 From Our Team" and "How Lisa T. Miller Took \$10,000 From Our Team".
- 116. A reasonable reader of Yu/Blitzmetrics' published false statements concerning Miller would conclude that Miller committed a felony under Florida law.
- 117. A reasonable reader of Yu/Blitzmetrics' statements would also come to distrust Miller and hold her in ill repute.
- 118. Yu/Blitzmetrics' false statements tend to subject Miller to hatred, distrust, ridicule, contempt, or disgrace.
 - 119. Yu/Blitzmetrics' false statements tend to injure Miller in her trade or profession.

- 120. Yu/Blitzmetrics' false statements are reasonably understood to implicate Miller's moral character and professional ethics.
- 121. Yu/Blitzmetrics' false statements about Miller tend to injure her occupation, business and/or employment.
- 122. Yu/Blitzmetrics' false statements about Miller imputed to Miller conduct and characteristics incompatible with Miller's lawful exercise of her occupation.
- 123. Yu/Blitzmetrics' false statements about Miller caused serious injury to Miller's professional and personal reputation.
- 124. Yu/Blitzmetrics' false statements about Miller were so obviously defamatory and damaging to Miller that they give rise to an absolute presumption of both malice and damages.
- 125. Yu/Blitzmetrics' false statements were willful and intended to cause harm to Miller's personal and professional reputation.
- 126. Yu/Blitzmetrics acted with knowledge or reckless disregard or at minimum negligently as to the falsity of the statements set forth in paragraph numbered 2 above.
- 127. As a direct and proximate result of Yu/Blitzmetrics' defamatory statements, Miller has suffered and continues to suffer reputational harm for which she is entitled to an award of damages to the greatest extent permitted under the law, including but not limited to punitive damages.

COUNT III Defamation Per Quod

- 128. Plaintiff Miller repeats and realleges paragraphs 1 through 70 and 97 through 101 hereof, as if fully set forth herein.
- 129. Yu/Blitzmetrics knowingly published a false statement about Miller on LinkedIn which was accessible for review by third-parties.

- 130. The false statement made by Yu/Blitzmetrics requires additional explanation, interpretation, or extrinsic evidence to prove how the statement is harmful to Miller's reputation or directed to Miller (collectively referred to herein as "Additional Explanation").
- 131. Yu/Blitzmetrics' Defamatory LinkedIn Comment ("this is one that stole \$10k from us") requires Additional Explanation to explain that Miller is the target of Yu/Blitzmetrics defamatory statement.
- 132. When the entire LinkedIn post to which the comment was made is reviewed, it is evident that Yu/Blitzmetrics' defamatory comment was about Miller. *See* Exhibit 3.
- 133. Similarly, Yu/Blitzmetrics numerous statements in his various social media and blog posts directed to Miller require Additional Explanation.
- 134. Yu/Blitzmetrics' false statements about Miller were willful and intended to cause harm to Miller's personal and professional reputation.
- 135. As a result of Yu/Blitzmetrics' false statements, Miller has specific quantifiable losses (i.e., special damages), including medical expenses and the costs associated with retaining a public relations company to address the reputational harm caused by Yu/Blitzmetrics.

COUNT IV Defamation by Implication

- 136. Plaintiff Miller repeats and realleges paragraphs 1 through 70 and 97 through 101 hereof, as if fully set forth herein.
- 137. Yu/Blitzmetrics' published statements concerning Miller created false suggestions, impressions and/or implications about her.
- 138. Yu/Blitzmetrics' published statements concerning Miller juxtaposed a series of facts that implied a defamatory connection between them.
 - 139. Yu/Blitzmetrics further created a defamatory implication by omitting certain facts.

- 140. Yu/Blitzmetrics' false statements were willful and intended to cause harm to Miller's personal and professional reputation.
- 141. Yu/Blitzmetrics pieced together private communications between Miller and Yu/Blitzmetrics with distorted and untrue commentary and incomplete facts in such a way that a reasonable person reading his social media posts and blog posts about Miller could be left with the untrue impression: that Miller scammed Yu/Blitzmetrics and the people who work with him out of money; that Miller did not pay for services provided by Yu/Blitzmetrics; that Miller is not reliable or trustworthy; that Miller is unreasonable and belligerent; that Miller does not abide by rules; and an overall negative impression of Miller.
- 142. As a direct and proximate result of Yu/Blitzmetrics' defamatory conduct, Miller has suffered and continues to suffer harm for which she is entitled to an award of damages to the greatest extent permitted under the law, including but not limited to special damages and punitive damages.

COUNT V Fraudulent Inducement

- 143. Plaintiff Miller repeats and realleges paragraphs 1 through 49 hereof, as if fully set forth herein.
- 144. Yu/Blitzmetrics promoted and advertised his AYG Program as a ready to go program on Facebook so that Miller and others would apply to the program and ultimately register for the \$10,000.00 if accepted.
- 145. Yu/Blitzmetrics did not disclose that the AYG Program was not complete but rather in development.

- 146. Yu/Blitzmetrics' advertisement and promotion of an incomplete program without disclosing that the program was not yet developed was a false statement of material fact.
 - 147. Yu/Blitzmetrics' knew that his representations about the AYG Program were false.
- 148. Yu/Blitzmetrics' intended to induce Miller to act on his promotion of the AYG Program.
- 149. In fact, Yu/Blitzmetrics' misrepresentations induced Miller to pay \$10,000.00 to sign up for his promoted AYG Program.
- 150. Miller acted in reliance on Yu/Blitzmetrics' representations that the AYG Program was an already developed program.
- 151. Miller has been damaged as a result of Yu/Blitzmetrics' misrepresentations in an amount to be determined at trial which is in excess of the \$10,000.00 sum she paid to participate in the AYG Program.

COUNT VI Fraudulent Misrepresentation

- 152. Plaintiff Miller repeats and realleges paragraphs 1 through 49 hereof, as if fully set forth herein.
- 153. Yu/Blitzmetrics directed Miller to watch out for a Facebook post announcing that Blitzmetrics was accepting applicants into the AYG Program.
- 154. Yu/Blitzmetrics represented in a Facebook post that he was accepting qualified applicants into the AYG Program.
- 155. Yu/Blitzmetrics intended for Miller to believe that the AYG Program was an already established program so that she would pay \$10,000.00 to participate in the program.

- 156. Yu/Blitzmetrics' statements that the AYG Program was an established program was false because the AYG Program was still in development when Yu/Blitzmetrics took \$10,000.00 from Miller for her to participate in the AYG Program.
- 157. Yu/Blitzmetrics' statement that the AYG Program was accepting applicants was material because that led Miller to believe that the AYG Program was an already established program. Neither Miller nor a reasonable person would have paid \$10,000.00 to participate in the nonexistent AYG Program if Yu/Blitzmetrics had not misrepresented the AYG Program.
 - 158. Yu/Blitzmetrics knew that his statements were false and intended to deceive Miller.
- 159. Miller acted in justifiable reliance on Yu/Blitzmetrics' misrepresentations and has suffered damages as a result of Yu/Blitzmetrics' fraudulent misrepresentations in an amount to be determined at trial. The damages are in excess of the sum she paid to participate in the AYG Program.

COUNT VII Negligent Misrepresentation

- 160. Plaintiff Miller repeats and realleges paragraphs 1 through 49 hereof, as if fully set forth herein.
- 161. Yu/Blitzmetrics made a misrepresentation of fact to Miller by representing that the AYG Program was a developed certification program when it was not.
- 162. In fact, Yu/Blitzmetrics instructed Miller to look out for the advertisement of the AYG Program on Blitzmetrics' Facebook page as to when they will be accepting participants into the AYG Program.
- 163. On or about May 9th, 2024, Miller saw a Facebook post promoting Yu/Blitzmetrics' AYG Program, a copy of which is attached hereto as Exhibit 19.

- 164. Thereafter, on May 9, 2024, Miller emailed Yu/Blitzmetrics, stating: "I would love to be part of the first certification program. I saw the FB post. Should I go from that link to apply?" to which Yu/Blitzmetrics responded, in pertinent part, "[y]es on checking out that link". *See* Exhibit 2, page 2.
- 165. Yu/Blitzmetrics' misrepresentation was material as it caused Miller to click on the link and pay \$10,000.00 to register for the AYG Program.
- 166. Yu/Blitzmetrics was negligent because he: (a) should have known that his representation that the AYG program was a developed program was false; or (b) made the statement without knowing its truth or falsity.
 - 167. Yu/Blitzmetrics intended to induce Miller to rely on the representation.
- 168. Yu/Blitzmetrics made the statement in either: (a) the course of his business, profession, or employment; or (b) any other transaction in which he had a pecuniary interest.
- 169. Miller acted in justifiable reliance on the misrepresentation and suffered damages as a result of the misrepresentation in an amount to be determined at trial and which is in excess of the sum Miller paid to participate in the AYG Program.

COUNT VIII Florida Deceptive and Unfair Trade Practices Act (FDUTPA)

- 170. Plaintiff Miller repeats and realleges paragraphs 1 through 101 hereof, as if fully set forth herein.
- 171. Miller seeks injunctive relief and damages under the Florida Deceptive and Unfair Trade Practices Act ("FDUTPA"), § 501.201 *et seq.*, Fla. Stat. (2024).
- 172. Yu/Blitzmetrics has engaged in "unconscionable acts or practices, and unfair or deceptive trade or commerce." § 501.204(1), Fla. Stat. (2024).

- 173. Yu/Blitzmetrics engaged in unfair and deceptive trade practices in violation of FDUTPA by promoting and selling Miller a \$10,000.00 program that was not yet developed without disclosing that material fact.
- 174. Yu/Blitzmetrics engaged in unconscionable acts or practices by harassing and tormenting Miller with extensive and continuous social media posts misrepresenting the facts in order to cause damage to Miller and cause Miller to pay Yu/Blitzmetrics money for him to stop his unconscionable behavior.
- 175. Yu/Blitzmetrics' acts and deceptive and unfair trade practices and unconscionable conduct have caused, and will continue to cause, substantial damage and irreparable harm to Miller to which there is no adequate remedy at law, including but not limited to Miller's personal and professional reputation.
- 176. Yu/Blitzmetrics' actions have caused Miller to suffer actual damages, including but not limited to, financial loss having to counteract the negative impact on her business caused by Yu/Blitzmetrics' unlawful, deceptive, and unconscionable conduct.
- 177. Miller is entitled to preliminary and permanent injunctive relief as well as actual damages resulting from Yu/Blitzmetrics unconscionable acts and unfair or deceptive trade practices which have caused Miller irreparable harm.
- 178. Yu/Blitzmetrics' unlawful, deceptive, and unconscionable acts have been intentional, malicious, and conducted in bad faith, and are part of a scheme Yu/Blitzmetrics has orchestrated with a design and purpose to injure and unlawfully disrupt Miller's life and cause her to pay him money.
- 179. Yu/Blitzmetrics is aware of the impact his unconscionable actions are having on Miller and continues to engage in escalating conduct to harm Miller.

- 180. Yu/Blitzmetrics practices are substantially injurious to consumers, unscrupulous, oppressive, unethical, and/or immoral.
- 181. Unless enjoined by this Court and restrained by law, Yu/Blitzmetrics' unconscionable acts and deceptive and unfair trade practices will likely continue.

COUNT IX Computer Fraud and Abuse Act 18 U.S.C. § 1030 (a)(2)(c)

- 182. Plaintiff Miller repeats and realleges paragraphs 1 through 59 and hereof, as if fully set forth herein.
- 183. Miller seeks injunctive relief and compensatory damages under the Computer Fraud and Abuse Act, 18 U.S.C. § 1030 (a)(2)(c), for Yu/Blitzmetrics illegal actions in attempting to access the backend of Miller's website www.LisaTMiller.com without authorization.
- 184. Months after Miller terminated her relationship with Yu/Blitzmetrics, Yu/Blitzmetrics without authorization attempted to access Miller's website and received information from Miller's protected computer advising that the login credentials which were previously provided to Yu/Blitzmetrics to complete a specific task are no longer working.
- 185. In particular, Yu/Blitzmetrics intentionally accessed a computer without authorization or exceeded his authorized access and obtained information from the protected computer in the form of a notification that the login credentials used did not work.
 - 186. As a result of Yu/Blitzmetrics' wrongful actions, Miller has been damaged.
- 187. Miller is entitled to injunctive relief and compensatory damages or other equitable relief pursuant to 18 U.S.C. § 1030 (g).
- 188. The computer fraud caused by Yu/Blitzmetrics caused a combined loss of at least \$5,000 to Miller during any one-year period.

COUNT X Computer Fraud and Abuse Act 18 U.S.C. § 1030 (a)(4)

- 189. Plaintiff Miller repeats and realleges paragraphs 1 through 59 hereof, as if fully set forth herein.
- 190. Miller seeks injunctive relief and compensatory damages under the Computer Fraud and Abuse Act, 18 U.S.C. § 1030 (a)(4), for Yu/Blitzmetrics' illegal actions in attempting to access the backend of Miller's website www.LisaTMiller.com without authorization.
- 191. Months after Miller terminated her relationship with Yu/Blitzmetrics, Yu/Blitzmetrics without authorization attempted to access Miller's website and received information from Miller's protected computer advising that the login credentials which were previously provided to Yu/Blitzmetrics to complete a specific task are no longer working.
- 192. In particular, Yu/Blitzmetrics knowingly and with intent to defraud, attempted to access Miller's protected computer without authorization, or exceeded his authorized access, and by means of such conduct he furthered the intended fraud to cause damage to Miller's website and obtained value for his wrongful actions by virtue of his intended impact on Miller and her reaction that followed when she became aware of his illegal conduct.
 - 193. As a result of Yu/Blitzmetrics' wrongful actions, Miller has been damaged.
- 194. Miller is entitled to injunctive relief and compensatory damages or other equitable relief pursuant to 18 U.S.C. § 1030 (g).
- 195. The computer fraud caused by Yu/Blitzmetrics caused a combined loss of at least \$5,000 to Miller during any one-year period.

<u>COUNT XI</u> Intentional Infliction of Emotional Distress

- 196. Plaintiff Miller repeats and realleges paragraphs 1 through 101 hereof, as if fully set forth herein.
- 197. Yu/Blitzmetrics' conduct by publicly posting all the statements set forth in this Amended Complaint and continuing to publicly post statements directed at Miller is intentional or reckless, that is, he intended his behavior when he knew or should have known that emotional distress to Miller would likely result from his actions.
- 198. Yu/Blitzmetrics' conduct was and continues to be outrageous, that is, as to go beyond all bounds of decency, and to be regarded as odious and utterly intolerable in a civilized community.
- 199. Yu/Blitzmetrics' conduct has caused and is continuing to cause severe emotional distress to Miller.
- 200. Miller has been injured by Yu/Blitzmetrics' conduct and is entitled to damages in an amount to be determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Miller requests that the Court enter judgment in her favor and against Defendant Yu/Blitzmetrics as follows:

- 1. That Yu/Blitzmetrics has violated Section 501 of the Copyright Act (17 U.S.C. § 501);
 - 2. That Yu/Blitzmetrics has violated the Computer Fraud and Abuse Act;
 - 3. That Yu/Blitzmetrics has violated the Florida Deceptive and Unfair Practices Act;

- 4. That Yu/Blitzmetrics' actions, conduct and practices complained of herein violate the laws of the State of Florida;
- 5. That Yu/Blitzmetrics is liable for copyright infringement, defamation per se, defamation per quod, defamation by implication, fraudulent inducement, fraudulent misrepresentation, negligent misrepresentation, the Florida Deceptive and Unfair Practices Act, the Computer Fraud and Abuse Act, intentional infliction of emotional distress;
- 6. Granting an injunction temporarily, preliminarily, and permanently enjoining Yu/Blitzmetrics, its employees, agents, officers, directors, attorneys, successors, affiliates, subsidiaries, and assigns, and all of those in active concert and participation with any of the foregoing persons and entities who receive actual notice of the Court's order by personal service or otherwise, from:
 - a. engaging in unconscionable acts and deceptive practices;
 - b. distributing, displaying, selling or authorizing any third party to distribute, display, or sell the Copyrighted Work and any products, works, or other materials that include, copy, are derived from, or otherwise embody the Copyrighted Work; and
 - c. aiding, assisting, or abetting any other individual or entity in doing any act prohibited by sub-paragraphs (a) and (b).
- 7. That Yu/Blitzmetrics be ordered to remove, take down and delete their false and defamatory statements about Miller on LinkedIn, Facebook or any other on-line platform;
- 8. That Yu/Blitzmetrics be ordered to provide an accounting of Yu/Blitzmetrics profits attributable to Yu/Blitzmetrics infringing conduct, including Yu/Blitzmetrics profits from sales and any other exploitation of the Copyrighted Work, and any products, works, or other materials that include, copy, are derived from, or otherwise embody the Copyrighted Work.

- 9. That Yu/Blitzmetrics be ordered to destroy or deliver up for destruction all materials in Yu/Blitzmetrics possession, custody, or control used by Yu/Blitzmetrics in connection with Yu/Blitzmetrics' infringing conduct, including without limitation all remaining copies/inventory of the Copyrighted Work and any products and works that embody any reproduction or other copy or colorable imitation of the Copyrighted Work, as well as all means for manufacturing them.
- 10. That Yu/Blitzmetrics, at its own expense, be ordered to recall the Copyrighted Work from any distributors, retailers, vendors, or others that have distributed the Copyrighted Work on Yu/Blitzmetrics behalf, and any products, works, or other materials that include, copy, are derived from, or otherwise embody the Copyrighted Work, and that Yu/Blitzmetrics be ordered to destroy or deliver up for destruction all materials returned to it.
 - 11. Awarding Miller:
- a. Yu/Blitzmetrics' profits obtained as a result of Yu/Blitzmetrics' infringing conduct, including but not limited to all profits from sales and other exploitation of the Copyrighted Work and any products, works, or other materials that include, copy, are derived from, or otherwise embody the Copyrighted Work, or in the Court's discretion, such amount as the Court finds to be just and proper;
- b. damages sustained by Miller as a result of Yu/Blitzmetrics infringing conduct, in an amount to be proven at trial;
- c. should Miller so elect, statutory damages pursuant to 17 U.S.C. § 504(c) in the maximum amount under the law instead of actual damages or profits;
 - d. damages sustained by Miller pursuant to § 501.201 et al, Florida Statutes;
 - e. damages sustained by Miller under the Computer Fraud and Abuse Act;

f. damages sustained by Miller for Yu/Blitzmetrics' fraudulent inducement,

fraudulent misrepresentation, and negligent misrepresentation;

g. damages sustained by Miller as a result of Yu/Blitzmetrics' defamation of her,

including punitive damages;

h. damages sustained by Miller as a result of Yu/Blitzmetrics' intentional infliction of

emotional distress; and

i. Miller's reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505 and

§501.2105, Fla. Stat. (2024),

12. Awarding Miller interest, including pre-judgment and post-judgment interest, on

the foregoing sums.

13. Awarding such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff Miller hereby demands a trial by jury on all issues of fact and damages stated

herein.

DATED: June 6, 2025.

Respectfully submitted,

PERKINS LAW – BRAND PROTECTION

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/L.A. Perkins/

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed on the Court's

CM/ECF docket on June 6, 2025, which serves same electronically upon all counsel of record. I

further certify that a copy of the foregoing filed document will be served on Defendant Dennis Yu

via email to: Dennis@Blitzmetrics.com and 668Sierra@gmail.com on June 6, 2025.

By: /s/ L.A. Perkins

L.A. Perkins, Esq.





How to Rank on Anyone's Name



Ranking in digital marketing typically refers to the position at which a website or webpage appears in the search engine results pages (SERPs) for specific keywords or search queries. When someone searches for a particular term, search engines like Google display a list of relevant websites, videos, and other content ranked in order of perceived relevance and authority.

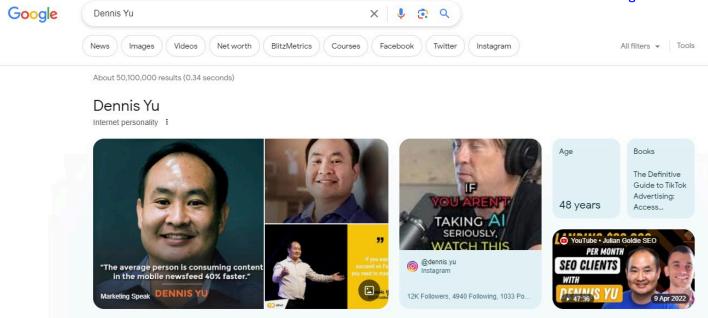
When ranking on a person's name or a brand name in digital marketing, it usually involves optimizing online content to ensure that it appears prominently when someone searches for that specific name. This can be important for personal branding, reputation management, or promoting a business.

But why would you want to rank on your name or someone else's name? Here's why:

Online Visibility and Trust

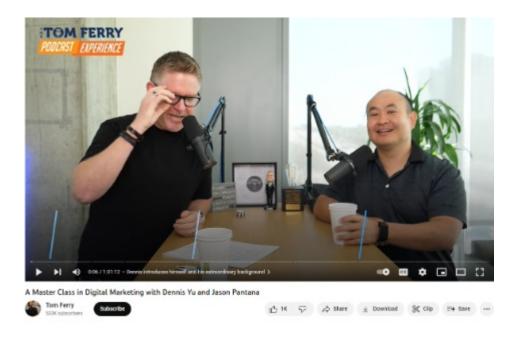
Ranking prominently on a person's name helps increase their online visibility and builds trust with their audience. When individuals can easily find accurate and relevant information about someone, it enhances their perceived authority, expertise, and trustworthiness.

So if I search for Dennis Yu, I want to control what shows up. So almost everything on the first page of Dennis Yu is me, even though there are a lot of people named Dennis Yu, and there are 38 million search results, which is competitive:



So you can also see my knowledge panel.

There would also be videos, those that you made and also videos that feature you or have you in the name, such as the one below where I am with Tom Ferry on <u>Tom Ferry's channel</u>, and my name's in it:



Google will even pull out particular moments or highlights that you can make more content around.

If you dominate the first page, it's harder for somebody to write a negative review about you because they have to get past all your good results.

Even if you don't have someone attacking you, you always want to be preemptive. The strongest defense is the best offense, and vice versa.

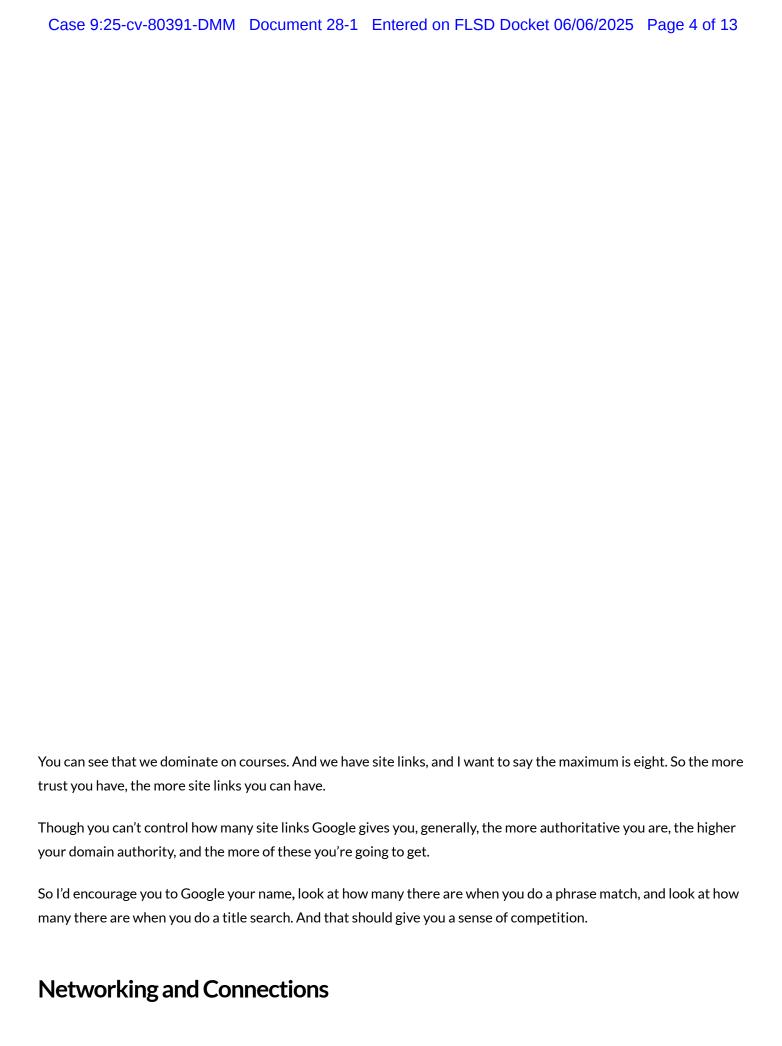
If you're trying to rank on any keyword, look at 'Related Searches' or 'People Also Ask (PAA)' to see if we can rank on the secondary searches to be then able to <u>rank on the big searches</u> as they tie together.

They want to know my net worth, about Content Factory, about dollar-a-day. So Google is showing us what these related terms are as well.

When your name appears in the PAA, that's basically an endorsement by Google. It's more powerful to show up here than it is for you to rank on this.

Brand Management

Ranking on a person's name allows them to have control over the information that appears in search results. It enables them to present their achievements, expertise, and positive content while minimizing the visibility of negative or irrelevant information.



Having a high ranking on a person's name can facilitate networking and building connections with 5th ersor the of 13 industry. When people search for the person's name, they can easily find their online profiles, websites, or social media accounts, allowing for meaningful engagement and collaboration.

But here's a sophisticated technique called inception to leverage another person's high-ranking name in your niche to increase your own network.

Let's say there's someone in your industry that you want to get to know better, but you don't really have a great connection with them.

For example, you wanted to build your career with Mari Smith, whose search results show that she's the queen of Facebook, blogging, Instagram, and Wikipedia and that she had written the original books on how to network and how to do social media reputation even before there ever was social media.

Don't just straight up make a connection request. You want to make sure that you build a little bit of rapport. Just like when you want to marry a girl. You don't just go straight to her and say, "Will you marry me?" You need to build that relationship over time.

So whoever you want to meet, stalk them on every single channel. Stalking doesn't mean that you immediately reach out and say, "Hey, I'd like to have a five-minute chat with you". The professional way is for you to 'follow' her on different channels.

Start to say something thoughtful about the topic she cares about, follow her on all her channels, and figure out who that intermediate person is- a mutual friend.

For example, I noticed she is also connected with my friend, Michael Stelzner, with whom I have made content. So, for a <u>Dollar a Day</u> on Twitter, I'll promote a very popular content that I created with Michael Stelzner on the topic, 'Facebook Algorithm Explained for Marketers', targetting Mari Smith fans and saying, "Facebook isn't as cool to the kids, but the algo is still as powerful as ever.

So, I'm sharing valuable content. It's still worthwhile at the surface level, but I'm trying to build influence on the second level. So I'll run ads against that content for a dollar a day, targeting her audience because I want them to see that I'm doing stuff with Michael Stelzner. So the way to get to somebody is to go to the other person, the gatekeeper.

It's the same networking strategy. We're just doing this digitally.

Marie Smith will probably see the tweet because her fans see it. They'll engage on it. If my content is good and I'm using the ad system to network for me, that tweet will likely show up almost promptly when you search my name.

This is how you build connections using social and SEO at the same time. SEO is the result. If I want to rank on Google, I might have to do certain things like do social media or create content or do these other things with the result being SEO.

Thought Leadership

Ranking well-on's person's name enables them to establish themselves as a thought leader of moustry expert. By 13 creating and sharing valuable content, participating in relevant discussions, and being visible in search results, they can position themselves as a go-to authority in their field.

So, let's say I've developed a relationship with Mari Smith; I could then go to her and say, "Hey Mari, I've got this article coming out on <u>optimization</u>. You're the queen of Facebook. Can you give me one tip that I can put in my article?", or, "I am bringing out the next edition of the best selling book on <u>TikTok Advertising</u>, what is your one tip for people that are Facebook advertisers but are trying to move to TikTok?" They almost always say yes.

If any of these people rank on the thing that I want to rank on, and Google trusts them, when I quote them, that will naturally send a powerful, relevant, familiar signal. And when they link to me, I'm getting juice from something that Google already believes is trustworthy when it comes to digital marketing optimization.

You can think of it as an edge, and social networks and search engines follow something called Edge rank, which is the connection between these different pieces. So Google looks for these connections; if we put together Mari Smith and Dennis Yu, where are those connections? So the more you associate with these other people, the more you'll benefit from their search power.

And if you have a clear LIGHTHOUSE, and I could use Mari Smith as a LIGHTHOUSE, for example, then I can leverage the fact that she has a community and trust as long as I honor that relationship.

Connecting and co-creating articles or videos with these high-ranking individuals will gradually raise your level of authority and, ultimately, to being a thought leader on that subject.

Here's an example where Mari Smith and I co-created the Facebook Marketing Success System (FMSS) course. First, we did an introductory 10-minute video to launch this course.

And now, I can take this video and pull out different snippets, turn them into social media pieces, or transcribe them through automated tools like Descript and turn that into an article.

https://www.marismith.com/facebook-marketing-success-system/

Building your clientele and partners will be almost automatic once you have established yourself as a thought leader. Then, they will come knocking on your door.

Case 9:25-cy-80391-DMM Document 28-1 Entered on FLSD Docket 06/06/2025 Page 7 of 13 **Shedding Light on Unethical Behavior**

Ranking on someone's name can bring attention to their misdeeds or negative actions. When individuals engage in harmful or unethical behavior, it is important for the truth to be known and for potential consequences to be recognized.

Our former business partner, <u>Tristan Parley</u>, built a seven-figure agency serving chiropractors, and then he turned around and stole.

So I documented exactly what happened, called him "the thief marketing officer", and this ranks on his name. He'll never really get rid of it because it's just too strong unless he fixes the problem. I optimized to rank on his name. What did I do? I put it in the title, a catchy one to grab attention. I didn't just put it in the title. I put it at the beginning of the title.

And I included screenshots of what happened, emails, details of all the equipment that got stolen, and even a video where he gleefully narrates what happened! In addition, that page has 17 links that are linked to related articles.

The Six Steps to Rank on Your Name or Someone Else's Name

Broadly, here are the six steps you need to take to achieve your goal of ranking on your or someone else's name (or even destroy someone's name).

Step 1 – Google search to see how many results there are just on the name:

Google your name, look at how many there are, then in phrase match (where you put your name within double quotes), look at how many there are, and then do a title search (intitle: Your Name).

So, the first page should be dominated by your Facebook page, LinkedIn page, website, blogs, Twitter account, images, and videos in a carousel or group of these videos together. And they don't have to be videos that you made. They could be videos that feature you or have you in the name. Your name should also feature in Related Searches, which you would see at the bottom of a Google search page.

<u>People also ask</u> diagnostically whether they can rank on the secondary related searches to then be able to rank on these big searches. So, they all kind of tie together.

If you ever want to rank something, please do not put it on a subdomain; put it on a subfolder. So, for example, 'fiverr.com/learn' is going to be better than 'learn.fiverr.com'.

Step 2 - Use Analytics

USeSEO tools like Ameris and Sem Rush to see how difficult it is to rank on that term. How many other pages are 13 showing up? Is it a commercial term? Are there ads being run against it?

Step 3 – Determine content and link strategy

Do you want to do a podcast? Do you want to speak? Do you want to <u>interview</u> some personalities? Do you want to go heavy on Twitter and LinkedIn? You assemble all this into your personal brand manager. So, you've got your <u>topic</u> <u>wheel</u>, the six topics you care about, and the people mapped to those topics; how you are going to use inception to try to reach those other people through connections you already have, through the content you've already created.

Step 4 - Outreach

This includes professional stalking on all channels, engaging intelligently, and creating content.

Step 5 - Activate Content Factory

Then, once you have created content, run the Content Factory to put it through bescript; to have the VAS from Fiverr or Upwork, Fancy Hands, turn this content into lots of little pieces that you put out there, which you then can amplify for a <u>Dollar a Day on Facebook</u>, Twitter, Instagram, and TikTok, on all that.

Step 6 - Optimize

<u>Optimization</u> is looking at where you have the most power stored inside your personal brand manager and amplifying those. So, the personal brand manager is your inventory of where you will put all these assets and just re-amplify and get way more power. There are different ways of amplification. It's not only ads, but also SEO is a kind of amplification.

Some Cool Tips

1. When you do a search, put in PWS=0 to put the personalized web search off.

When you log in without it, Google will show you results that are personalized for what you have done, where you have been, and everything about you. As a result, everyone gets a slightly different set of search results.

So if you are in the industry of Search Engine Optimization or <u>Digital Marketing</u> or Consulting for a living, odds are there are certain URLs that you go to all the time. So you might think you rank better than you actually do. So to get the right result, you need to log out.

And if you're doing <u>SEO</u> for a client, most of them may think they're doing really well because they click on their website all the time, and every couple of days, they come in and check, but in reality, they don't rank as good as they actually do. They are just fooling themselves because they're logged in while they do the search.

So instead of having to log out, you enter PWS=0.

2. If you ever want to rank something, please do not put it on a subdomain; put it on a subfolder.

A subdomain is halfway between being on the main domain versus being a completely different domain. It's this weird stepchild. it doesn't rank quite as high if it's on a sub-domain.

- 3. There are 20 or 30 social networks that you're probably never gonna spend any time on, but you should just get registered anyway. That way, you could have a broader reach, tailor your marketing strategies to specific platforms and target different audience segments more effectively, and niche targeting.
- **4. Trigger a knowledge panel on Google** by claiming your profile and earning the ability to edit that by uploading your driver's license and business documents. Provided there's not someone else with the same name that confuses Google, they will give you the knowledge panel, and then you can add in all the stuff here, like videos, books, and other assets.

- 5. Your should be on fwitter, not because you want a tweet affine time, but because Google just likes to put your 13.

 Twitter right below the name.
- **6.** When you **put out good content**, people engage, and they will blog about it. They will link to you. They will reshare it. Try to create content so well that each piece generates links.
- **7.** Be very cognizant of the category structure and the keywords that you select for your blog posts. For example, if you want to rank on someone's name, have their name in the title.
- **8. Repurpose content**, especially those like Apple podcasts that don't easily show up in searches, into articles by running them through automated transcription tools like Descript with the help of Virtual Assistants, and share that on Twitter and other social media. So you can get more mileage from it in building your network. You could then boost it using the dollar-a-day approach.

When you repurpose videos, upload them to YouTube, and embed the YouTube in the blog post, then we get featured videos and other kinds of rich snippets in the search results. You use the <u>Content Factory</u> to create these assets.

- **9. Use accelerated mobile pages**, which is a plugin that we can use on WordPress, so it loads faster.
- 10. Use SEO tools like SemRush or ahrefs to determine the keyword difficulty, especially if it is a common name or there are ads running against it. You could also see how authoritative the other websites and webpages are that are using that name/keyword. For example, yourcontentfactory.com, which uses the keyword, Dennis Yu, has an authority score of 82.

0:00 / 4:32

11. If you're not ranking on your name, then figure out what **long tail things** you could rank on. A long tail is your name plus a topic or your name plus a person's name; for example, I can rank on Dennis Yu and Jeremy Duney, or on Dennis Yu and LinkedIn strategy, or whatever it is. This is an easier way to rank because you just need to have co-created content; it could be a podcast; you interview them, engage on Twitter or LinkedIn, and so on, and assemble these into your <u>personal brand manager</u>, which has your topic wheel.

12. Post content like blog posts as a guest author on other websites that have high domain ranking. For example, www.free-ebooks.net has a domain ranking of 74. So, when you write an article on their blog page and link that back to your website or your webpage that is relevant to the article, that will generate a lot of traffic to your website and will increase your own domain ranking, which in turn will generate more engagement for your other content on your website.

13. Don't link out just gratuitously to Google.com or Facebook.com. The only time we're going to send outbound links is if it's to a partner or a client or some kind of article that we really think is worthwhile. We're not just going to randomly link to some article or whatever because that's just bleeding the juice. You only have so much juice.

Conclusion

Ranking on a person's name in digital marketing has numerous benefits, including increased online visibility, trust-building, brand management, networking opportunities, thought leadership establishment, and shedding light on unethical behavior.

By optimizing online content and utilizing effective strategies, individuals can control the information that appears in search results and position themselves as authorities in their field.

Building connections with high-ranking individuals and co-creating content can further enhance one's authority and expand their network.

Additionally, utilizing tips such as personalized web search settings, subfolder placement, social media presence, knowledge panel claiming, content repurposing, and SEO tools can contribute to achieving higher rankings.

Utilinately, ranking on a person's name in digitar marketing can significantly impact personal branding, reputation 13 management, and professional growth.



Dennis Yu is a former search engine engineer who has spent a billion dollars on Google and Facebook ads for Nike, Quiznos, Ashley Furniture, Red Bull, State Farm, and other organizations that have many locations. He has achieved 25% of his goal of creating a million digital marketing jobs because of his partnership with universities, professional organizations, and agencies. Companies like GoDaddy, Fiverr, onlinejobs.ph, 7 Figure Agency, and Vendasta partner with him to create training and certifications. Dennis created the Dollar a Day Strategy for local service businesses to enhance their existing local reputation and make the phone ring. He's coaching young adult agency owners who serve plumbers, AC technicians, landscapers, roofers, electricians in conjunction with leaders in these industries. Mr. Yu believes that there should be a standard in measuring local marketing efforts, much like doctors and plumbers need to be certified and licensed. His Content Factory training and dashboards are used by thousands of practitioners.

Other Posts by Dennis Yu →







How Lisa T. Miller Stole \$10,000 From Our Team



by **DENNIS YU** / November 14, 2024



A few months ago Lisa T. Miller joined our program to be AYG certified. Lisa is the Founder of VIE Healthcare Consulting and showed interest in joining our paid program for agency owners in different verticals.

The goal for this program was to build local service agencies who can serve various niches that are in an LSA category. With her healthcare consulting background, we figured this could be the perfect opportunity to help build her agency.

Shortly after we announced the program's creation - she reached out and expressed interest in joining.

On Thu, Feb 22, 2024 at 7:09 AM < lisatmiller4@gmail.com > wrote:

Hi Dennis − I am not being a pest 😉I definitely want to be part of your certification.

I am helping a friend of mine who owns a local massage therapy company who also provides PEMF therapy (which is amazing). I am not charging for anything but just giving her some ideas about her website. I was on a call with her website company and had to persuade them to use WordPress vs Wix (I showed by friend the video with you and the plumber) and she was able to support that is as what she wanted. So the website guy conceded and is building her new site on wordpress.

I also shared some SEO ideas and using PAA and videos. Mike, her website developer and his designer said no way to videos and just keep the slider of stock images....I was shocked and so was my friend who owns the business. And this is the website guy locally here in Palm Beach Gardens area that is the go-to person and he is very busy (very busy putting people on Wix sites and giving bad SEO advice).

I want to provide great and highly effective SEO services to local businesses here in Florida. My friend needs the work and yet she is an amazing therapist.

So two things---should I schedule a paid hour call with you via your website and/or wait for your announcement for the certification?

Thank you! As I said before---I love what you are doing to help so many people. -Lisa

Everything seemed clear on our end. This was someone who we believed would take our program and succeed, especially with her background in medical sales.

Lisa--- great spending time together with you today.

You're a champion of stopping runaway waste in healthcare marketing-- getting accountability and performance in place.

You might consider what Marko and I have done in home services, as the same 5 steps apply.

Very easy to make the same video plus corresponding article, landing page, audit, etc:

https://www.youtube.com/watch?v=fnqeiWuYPol

Here is the recording of our call:

Passcode: snp#sHL1

Best regards.

Dennis Yu

While visiting another client in Boca Raton, Lisa stopped by to visit myself, Parker, and Danny – young adults who also believed in the mission of helping local service businesses. In her own words, our conversation and advice was "wonderful".



lisatmiller4@gmail.com

to 668sierra, me, danny 🕶

Dennis, Danny and Parker---It was really wonderful to spend time with you today. I appreciate your willingness to talk and share knowledge and get to know each other.

Apr 6, 2024, 10:11AM 🕁 🕤

Thu, May 9, 10:16 AM 🏠 🕤 ᠄

I am going to do more research on a niche—I do agree that Functional Medicine is a solid opportunity and makes a lot of sense considering my background.

There is someone in this space – but I am not overly concerned –

https://www.functionalmedicineseo.com/

Thoughts?

Thank you in advance for your advice. Looking forward to working with you on projects and referrals. -Lisa

On May 9th, 2024 Lisa T. Miller reached out again requesting to be enrolled in our AYG certification program for \$10,000. The program offerings included the basics to grow her digital marketing agency by conducting Are You Googleable audits.



Dennis Yu <668sierra@gmail.com>

to lisatmiller4, me 🕶

Lisa-- I think you would be nearly ideal for our program.

The only bit you're missing is you don't have a base of local service clients and a team of VAs yet. But I think we can overcome that quickly.

Yes on checking out that link and coordinating with Parker so we can get all the right pieces in place for you to be the queen in medical LSA.

Best regards,

Dennis Yu

http://www.linkedin.com/in/dennisyu

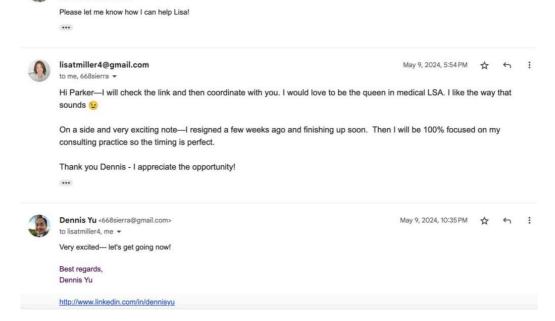
Psst... Are you a local business? Get step-by-step lead gen training or have us do it for you-- your choice! Reply here and I'm happy to answer your questions.

On Thu, May 9, 2024 at 4:10AM < lisatmiller4@gmail.com > wrote:

Good morning Dennis - Please let me know how, when I can jump in and whats most appropriate in this scenario.

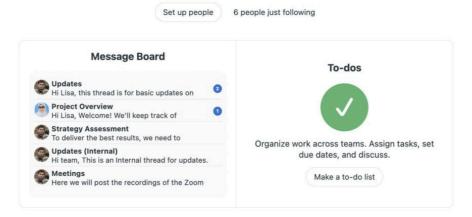
Also—I would love to be part of the first certification program. I saw the FB post. Should I go from that link to apply?

Thank you!



Within 24 hours of her paying our team, we setup her Basecamp account (where should could message our team) and have access to all of our trainings and support.

Clients 2 - AYG Agency: Lisa Miller (Medical LSA)

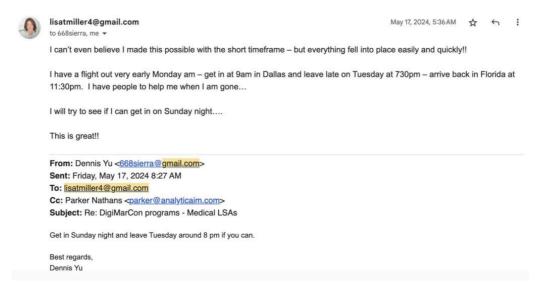


The requirements, time commitment, and obligations were clear from the start and she knew the responsibilities. The problems began shortly thereafter in emails not being answered, site updates we recommended not being completed, and meetings being ignored.

As you can see in the email below, we were practically spoonfeeding her solid leads.

Cc: Parker Nathans cparker@analyticaim.com> Subject: Re: DigiMarCon programs - Medical LSAs Lisa-- you ready? I've got some medical companies for you. Best regards. Dennis Yu http://www.linkedin.com/in/dennisyu Psst... Are you a local business? Get step-by-step lead gen training or have us do it for you-- your choice! Reply here and I'm happy to answer your questions On Fri, May 10, 2024 at 3:44 AM Dennis Yu <668sierra@gmail.com> wrote: Please publish this list of 20 medical LSA on your site. And over time, we'll build out pages for each category We can also get your agency site and personal brand site set up, too-- less foundational or technical work for you. As well as drive leads for you, which is a nice perk of our agency program, but not the main benefit. Best regards. Dennis Yu

We even invited Lisa out to a private mastermind in Dallas - which she happily took advantage of.



During this private mastermind with Roger Wakefield, <u>Parker Nathans</u>, and <u>Danny Leibrandt</u>, we discussed the responsibilities of all those involved. That Parker, Danny, and Lisa would have different verticals and would follow the blueprint in our courses.

After our meeting – things went dark on Lisa's side. Emails weren't responded to, website changes weren't being made, and our weekly <u>Office Hours</u> (where she could get 1-1 support) weren't being attended.

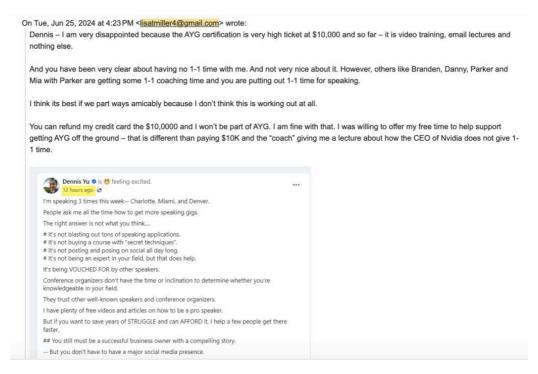
Instead, she preferred to message me 1-1 and outright not follow our very clear instructions.

In addition to our structured program, I personally went above and beyond to help Lisa grow her digital marketing agency. This included:

- Lining up speaking opportunities for her.
- Creating marketing assets specifically tailored to her needs.
- Inviting her to exclusive masterminds.
- Allowing her access to our weekly coaching calls (which she rarely attended).

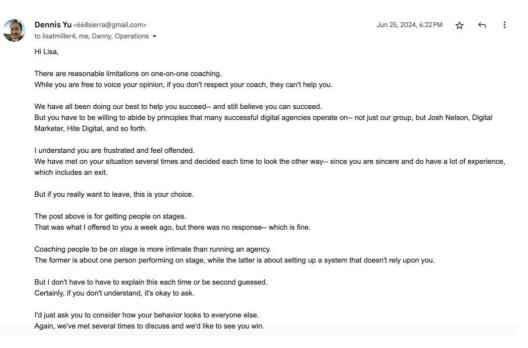
She also got to keep all materials, training, resources, and time we provided free of charge. Despite her lack of participation, our team continuously reached out to support her growth.

There is not one part of our program we didn't fulfill for her– and we stand proudly behind what we've done for her, whether she acknowledges it or not– or is even aware of it (see the many messages our team sent her where she wouldn't or couldn't respond).



Lisa Miller's argument was that I was giving too much 1-1 support to others instead of her – despite the fact that she never attended our office hours or followed our very clear instructions.

This was despite me inviting her to speak on stage with me in Florida, which she didn't even reply to. But in Lisa's world, *she was willing to offer us her time*, even though she's never successfully grown any agency before and was a massive time waster on our end.



In response to my email, Lisa bizarrely points to Mia Jenkins, the daughter of my friend Jeremy who runs <u>Crown</u> <u>Restoration</u>, a restoration company in San Antonio. Unlike Lisa, Mia wants to help her dad run Crown Restoration and has attended Office Hours with our team and followed our steps.

According to Lisa T. Miller, my email was "bullying", and that I was trying to shame her.

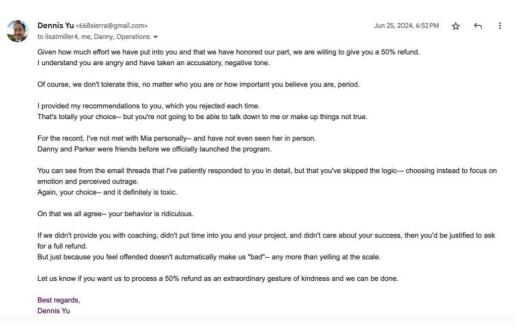
Dennis – We have not met several times on the certification program – I disagree. You brought on Mia – she received training that I could have been on and I asked professionally and it was another long winded dissertation and constant non-answering the basic question. I wanted to be included in the AYG training you were providing someone else as that makes sense. Remember the email you sent me on not having 1-1s but better to have the discussions with a group???

This is toxic – and it doesn't stop. This is a bullying email and you trying to shame me – that's on you not me on how this looks to everyone – so ridiculous you would pull that. I have never had a work or professional experience like this.

Yes please refund me to the credit card I paid on. Thanks, Lisa

to 668sierra, me, Danny, Operations 🕶

Even though at this point we've already lost thousands of dollars in potential clients (since she didn't follow our steps or attend any meetings), I offered her a 50% refund as an incredible act of kindness.



You can guess how the rest of our conversion went. Accusatory, and pretending like she gave AYG "resources". Keep in mind, Lisa has had access to all of our training from the beginning which she never watched or used. Mia did not get any extra training.

Lisa then proceeds to threaten us with a lawsuit.



lisatmiller4@gmail.com

to Roger, 668sierra, me, Danny, Operations $\, ullet\,$

Jun 25, 2024, 7:00 PM ☆ ←

No Dennis 50% refund is completely unacceptable—I have not been given significant training and now not part of the AYG program. In fact—I gave you and AYG a lot of resources and time that was invested in the startup and support of AYG. Which would be clearly evident in a deposition.

I never said you gave Mia the training—I said she was given training. I never had that opportunity. And I asked for it – and it was drama and still at the end of day – no access or updates on how to get that training.

I don't think you want any legal issues. I want the full refund. I will accept 50% refund payment now and 50% refund payment next month.

to lisatmiller4, Roger, me, Danny, Operations

You've had access to training all along.

Even though that's not the main value of a certification, we happily provided it when you asked.

We don't want legal issues, either.

But again, that is your call if you want to threaten and go down that path.

Find a good lawyer and ask them what it costs to get through discovery— even before it gets to a trial. They will tell you the options and cost— not me.

If you are mad about Mia, who you should never compare with anyway—consider that she is going through the courses in the Academy to implement. And the results are coming through for her initial client—her father's business.

Can't believe you're still stuck on Mia-- who has gotten far less attention and time from me than you. If anything, she should be jealous of how much more time we've been putting into helping you.

Imagine if you put your focus into results instead of this silly game

Everyone else here is serious about growing their agency and driving results for clients.

If they wanted to, they could instead spend all their time coming up with excuses and blame everyone except themselves.

But they focused on their business and are highly coachable.

We are highly principled and aren't going to budge on this.

It's all documented, as you know

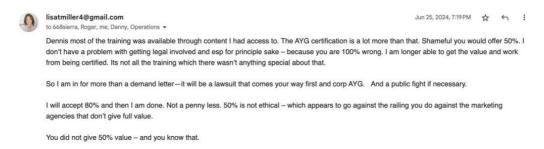
Your call.

Best regards,

Refund \$8,000 I am done.

Donnie V

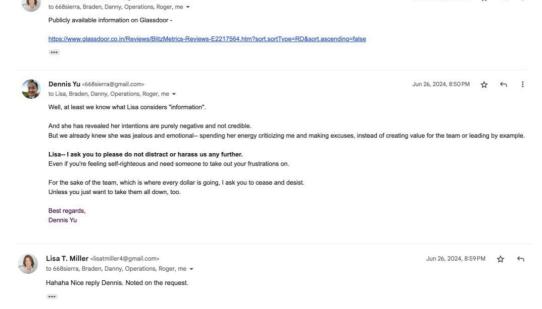
Lisa continues her meltdown by not only threatening me personally – but our entire team who's poured countless hours into trying to get her to perform what's documented in our training.



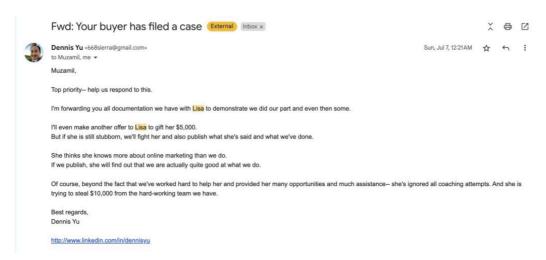
Despite her threatening the livelihoods of people that work with us – I offered her one last chance to take the 50%.



A day later, she posted a link to our Glassdoor reviews, citing that as "evidence".



This "lawsuit" never materialized, of course. Probably because she knew she was being dramatic and had no proof that she had been defrauded. Instead, she went to Paypal directly and put in a payment dispute in a last ditch effort to get \$10,000 from our team.



For context on Paypal disputes, Paypal tends to side with the buyer 90% of the time. Unless your case is rock solid, the buyer almost always wins. Never-the-less, we submitted our evidence to Paypal which you can read here:

Dear PayPal Resolution Center,

We are writing to respond to the dispute filed by Lisa T. Miller regarding the \$10,000 transaction for the Are You Googleable (AYG) agency certification program.

Lisa T. Miller enrolled in the Are You Googleable (AYG) certification program for \$10,000. The program offerings are clearly stated at blitzmetrics.com/aygc, which is to put in place the

We have fulfilled the items from this program, as detailed in this document— to help her grow her agency, build her website, put her on stages, continue to provide her with medical leads (the goal of the agency program), and so forth.

We have successfully helped over 25 digital agencies start and grow in our 6 phase program in the last 3 years. We've had 3 failures, which is about a 10% failure rate, largely due to participants being unable or unwilling to complete the exercises required on their end. We do our part—which is to train them, guide them, set them up with a LIGHTHOUSE (respected firm in their niche), build their website, promote their brand, and see them grow. In particular, they must be able to perform the Are You Googleable Audit, since all our agencies run this audit and fix items identified from this audit. Lisa has been unwilling to do this, despite our encouragement and the business leads we provided her.

Summary

- She has not shown up to the weekly coaching sessions that are on Thursdays at 2 pm PST, which are key to being able to progress.
- She completed the assignments on her end or responded to messages following up with her, as evidenced by the sporadic Weekly Status Reports she is supposed to provide every Friday.
- Her primary claims are that she didn't get access and that another coaching client is getting favorable treatment. Both of these are not true:
- She and her virtual assistant, Alexandra, got access within 24 hours of their request.
 The access we granted was complete— across all our modules and training, though she claims it was partial. Our logs verify that we granted her complete access.
- Ms. Miller claims that Mia Newman, another agency coaching client, was getting private
 one-on-one access with Dennis Yu. Mia has never had any private coaching sessions
 with Dennis Yu, though she did have a set-up call with Parker Nathans, since her father
 is a direct client

 not a coaching client.
- We even invited Ms. Miller to Dallas for a 3 day mastermind, which Mia didn't get access to.

offered a 50% refund as a goodwill gesture, which Lisa rejected. Our client service team reviewed her case and are still willing to offer a \$5,000 gift to resolve the issue. As you

can see from the email threads, she is belligerent and not willing to abide by program rules, basic communication, or logic. We have expressed that we've been willing to help her grow her agency at every point, even now. But if she isn't willing to do the work or trust our expertise, it will be very hard to help her.

If you need any of the several dozen other emails or wish to talk to any of the other agencies in the program, discuss with our staff, we are available for you.

Best regards,

Dennis Yu

CEO, BlitzMetrics

As annoying as someone trying to steal \$10,000 from our team is – what's worse is that it froze our Paypal account. Meaning we couldn't process transactions from others who wanted to pay us.

Miraculously, Lisa's case against us was so empty that a few weeks later the case was resolved in our favor.

Hello, dennis yu



We've decided the case in your favor

This case was decided in your favor because your buyer was unable to provide the information we had requested. This case is now closed, but we still encourage you to work directly with your buyer to find a resolution.

If there was a hold on this transaction, it has been removed.

Transaction details

Case ID

PP-R-IVE-531923769

Buyer's name

Lisa Miller

Phew-- what a relief.

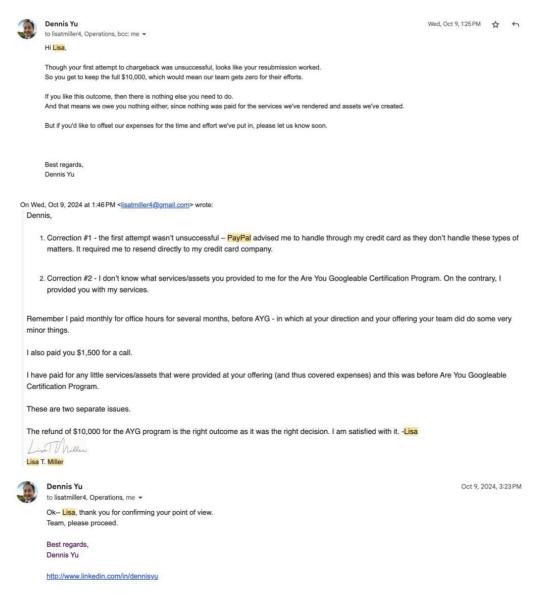
And to think that we offered her \$7,000 back as a free gift, even though we have provided excellent service all along Muzamii, please update the documentation with this and share with the BBB.

Best regards,

Best regards Dennis Yu

http://www.linkedin.com/in/dennisyu

Unfortunately for us, Lisa continued to resubmit disputes on her end. And months later on her 5th attempt, Paypal decided in her favor anyways.





lisatmiller4@gmail.com

to 668sierra, Operations, me -

Whatever Dennis. If this makes you feel better – go at it.

...

So there you have it. Lisa Miller has successfully stolen \$10,000 from our team, despite our months of helping her, flying her to masterminds, and inviting her on stage.

Her response was not cooperative. She accused us of bullying and threatened legal action, despite the months of effort we put into supporting her. Lisa eventually filed a dispute with PayPal, freezing our account and causing significant disruptions to our operations. And **she got 100% of her money back**.

What got her so furious was that she wanted to be a part of another client's private conversations— to which we said it wasn't relevant to her nor did we have permission from that other client. You can see everything was going well prior to this emotional tantrum. After multiple disputes and a final decision in her favor, she managed to

Since PayPal has decided in her favor after multiple disputes, we have little hope of recouping our money. So instead, we've decided to publish an article outlining exactly how Lisa T. Miller operates when working with other businesses.

After failing in her niche for healthcare providers, it appears that she's now working in "mastering executive selling" – using the same website template we built for her for no free (which other companies sell for \$5k+).



The point of this article is to rank on Lisa T. Miller's name and show others the kind of behavior she has towards businesses she works with. If you're planning on working with Lisa, be aware that this is how she operates and don't expect her to be reliable or trustworthy.

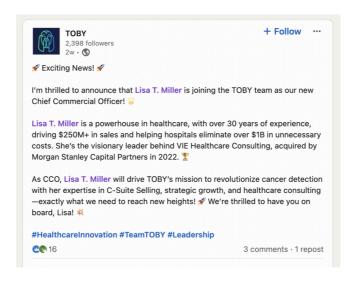
The long-lasting effects of Lisa's temper tantrum still harm our team. Our Paypal account has yet to be restored, meaning we've had to find alternative ways to pay our employees and team-members.

She privately messaged Danny, one of our young adults, in a way which was vaguely threatening saying "I'm surprised that you have been silent about this. I would have expected better of you..."

Was this supposed to be a threat? Considering she's already threatened legal action against me personally, is she targeting 20 year old agency owners as well?

Lisa, if you're reading this, there's still time to make things right and refund the \$10,000 to our team. If not for me personally, than for the young adults and our employees who've spent countless hours trying to train you.

Update: It looks like Lisa has been added as the "CCO" of TOBY, a company which claims to help detect prostate cancer in urine. If true, would be a very bad decision on their end given Lisa's history.



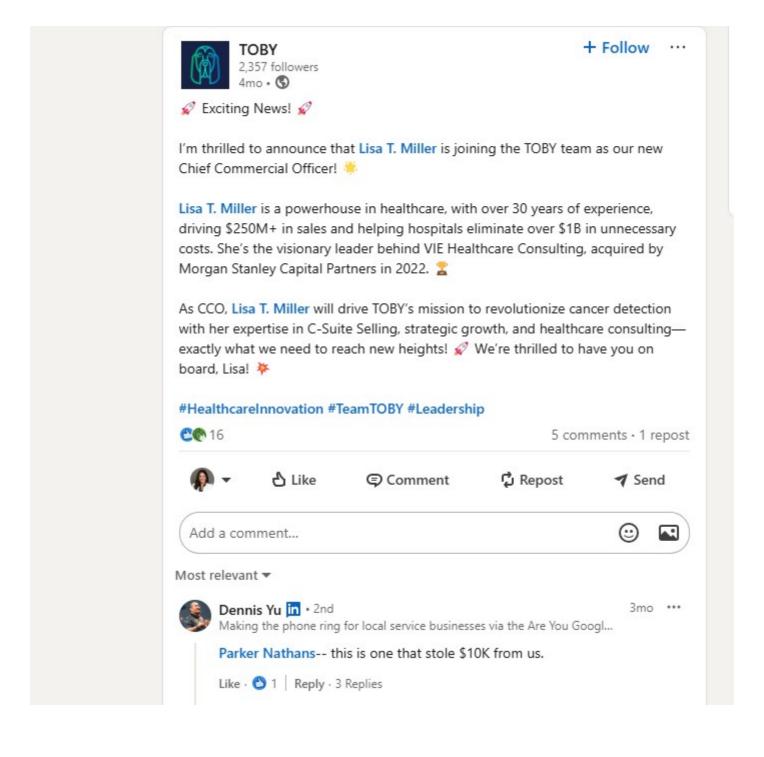


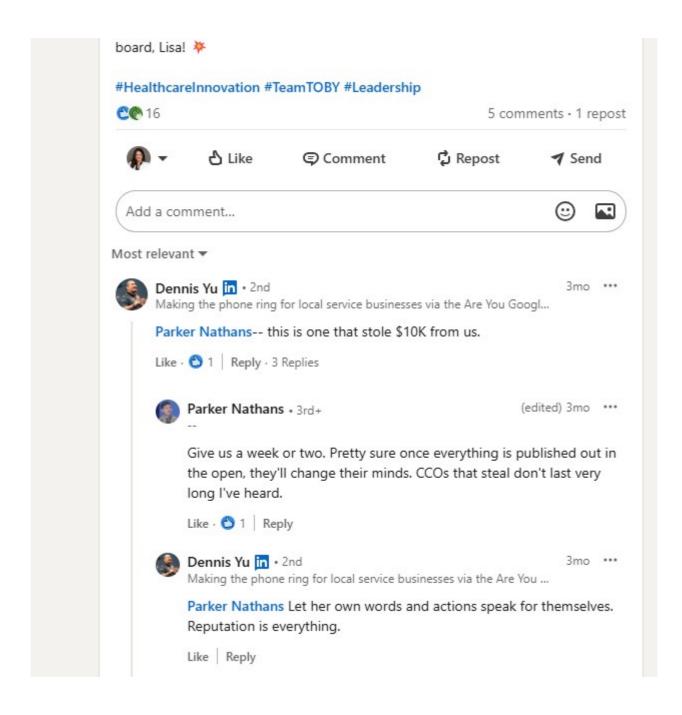
Dennis Yu

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Dennis Yu is a former search engine engineer who has spent a billion dollars on Google and Facebook ads for Nike, Quiznos, Ashley Furniture, Red Bull, State Farm, and other organizations that have many locations. He has achieved 25% of his goal of creating a million digital marketing jobs because of his partnership with universities, professional organizations, and agencies. Companies like GoDaddy, Fiverr, onlinejobs.ph, 7 Figure Agency, and Vendasta partner with him to create training and certifications. Dennis created the Dollar a Day Strategy for local service businesses to enhance their existing local reputation and make the phone ring. He's coaching young adult agency owners who serve plumbers, AC technicians, landscapers, roofers, electricians in conjunction with leaders in these industries. Mr. Yu believes that there should be a standard in measuring local marketing efforts, much like doctors and plumbers need to be certified and licensed. His Content Factory training and dashboards are used by thousands of practitioners.

Other Posts by Dennis Yu →







Now she's associating herself with this company, so her reputation will significantly impact theirs. Check it out:



Like Reply

Collapse replies



Jeffery Bray, NACD.DC, MBA, SHRM-SCP, CHC • 2nd 3mo ***
Experienced Board Member and Executive Leader | Driving Strategic Gro...

Congratulations Lisa T. Miller on your newest adventure! Congratulations to TOBY for bringing on an extremely talented expert in Lisa! Great combination for the impressive work you are doing!

Like Reply





Crunchbase

https://www.crunchbase.com > person > lisa-miller-0f5d :

Lisa T. Miller - Founder & CEO @ VIE Healthcare Consulting

Overview · Location Greater New York Area, United States, North America · Regions East Coast · Gender Female. Website lisatmiller.com/; LinkedIn View on ...



k.com

https://x.com > lisa_t_miller :

Lisa T. Miller | Healthcare Strategist (@Lisa_T_Miller) / X

I captured 53 different ways I've attracted leads + attention from my dream clients. Normally we only give this to our \$10k+ clients, but today I'm giving it ...



BlitzMetrics

https://blitzmetrics.com > how-lisa-t-miller-stole-10000-...

How Lisa T. Miller Stole \$10000 From Our Team

Nov 14, 2024 — A few months ago Lisa T. Miller joined our program to be AYG certified. Lisa is the Founder of VIE Healthcare Consulting and showed interest ...

Images :



Lisa T. Miller - Lisa T. Miller | Lin...





Master Life Sciences Sales Co...

www.lisatmiller.com



Lisa T. Miller Healthcare Cons...

Palm Beach North Chamb...

Case 9:25-cv-80391-DMM Document 28-5 Entered on FLSD Docket 06/06/2025 Page 1 of 1



Contract ID: b48cb5dd224f7c4d24bccadd56fd29de

Page 1 of 1

Date



Copyright Transfer Agreement

This agreement confirms the sale of copyright for four images from the August 21, 2018, photoshoot featuring Lisa T. Miller. The following images are included in this transfer:

- 1. _JW23965.jpg A professional headshot of Lisa T. Miller wearing a light-colored blazer, captured in a bright, welcoming setting.
- _JW23921.jpg A business portrait of Lisa T. Miller seated at a desk with a laptop, wearing a dark blazer, set in a professional office environment. _JW11145.jpg A relaxed and engaging portrait of Lisa T. Miller in a well-lit, elegant space, exuding warmth and confidence.
- 4. _JW10682.jpg A casual yet polished portrait of Lisa T. Miller seated in a sophisticated, stylish setting.

Com Mules

With this sale, full copyright ownership of these four images is transferred to Lisa T. Miller. This means she has exclusive rights to use, reproduce, modify, and distribute these images as she sees fit. The photographer no longer holds any rights to these images.

Studio: Client:

Jule Wagn

Julia C. Wagner Lisa Miller Printed Mar 4. 2025 Mar 4, 2025 Mar 4, 2025

Client Signature Information

Contract ID: b48cb5dd224f7c4d24bccadd56fd29de Signature ID: 723f18079303b92707cb5e82672dcfce UTC Timestamp: Tue, 04 Mar 2025 02:23:25 +0000

IP Address: 104.0.90.146

User Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/133.0.0.0 Safari/537.36 Edg/133.0.0.0

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Registration Number VA 2-436-673

Effective Date of Registration: March 05, 2025

Registration Decision Date:

March 10, 2025

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| (11)는 일이 경우에 전 Bibliog(8) 경우에 전 Biblio | gister of Copyrights and Director |

| Title | |
|---|--|
| Title of Work: | Lisa T. Miller - Photograph |
| Completion/Publication | |
| Year of Completion: Date of 1st Publication: Nation of 1 st Publication: | 2018 August 21, 2018 United States |
| Author | |
| Author: Author Created: Work made for hire: Citizen of: Domiciled in: | Julia C. Wagner photograph No United States United States |
| Copyright Claimant | - (|
| Copyright Claimant: | Lisa T. Miller 9292 Coral Isles Circle, Palm Beach Gardens, FL, 33412, United States |
| Transfer statement: | By written agreement |

Certification

L.A. Perkins Name: Date: March 05, 2025

Applicant's Tracking Number: 00463

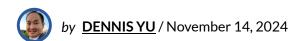
Correspondence: Yes







How Lisa T. Miller Stole \$10,000 From Our Team





Lisa T. Miller

A few months ago Lisa T. Miller joined our program to be <u>AYG certified</u>. Lisa is the Founder of VIE Healthcare Consulting and showed interest in joining our paid program for agency owners in different verticals.

The goal for this program was to build local service agencies who can serve various niches that are in an <u>LSA</u> <u>category</u>. With her healthcare consulting background, we figured this could be the perfect opportunity to help build her agency.

Shortly after we announced the program's creation - she reached out and expressed interest in joining.

Hi Dennis – I am not being a pest 😉 I definitely want to be part of your certification.

I am helping a friend of mine who owns a local massage therapy company who also provides PEMF therapy (which is amazing). I am not charging for anything but just giving her some ideas about her website. I was on a call with her website company and had to persuade them to use WordPress vs Wix (I showed by friend the video with you and the plumber) and she was able to support that is as what she wanted. So the website guy conceded and is building her new site on wordpress.

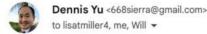
I also shared some SEO ideas and using PAA and videos. Mike, her website developer and his designer said no way to videos and just keep the slider of stock images....I was shocked and so was my friend who owns the business. And this is the website guy locally here in Palm Beach Gardens area that is the go-to person and he is very busy (very busy putting people on Wix sites and giving bad SEO advice).

I want to provide great and highly effective SEO services to local businesses here in Florida. My friend needs the work and yet she is an amazing therapist.

So two things---should I schedule a paid hour call with you via your website and/or wait for your announcement for the certification?

Thank you! As I said before---I love what you are doing to help so many people. -Lisa

Everything seemed clear on our end. This was someone who we believed would take our program and succeed, especially with her background in medical sales.



Mar 8, 2024, 5:06 PM ☆



Lisa--- great spending time together with you today.

You're a champion of stopping runaway waste in healthcare marketing-- getting accountability and performance in place.

You might consider what Marko and I have done in home services, as the same 5 steps apply.

Very easy to make the same video plus corresponding article, landing page, audit, etc:

https://www.youtube.com/watch?v=fnqeiWuYPol

Here is the recording of our call:

https://us02web.zoom.us/rec/share/BUtu0_xrtLUnCC1tL6m808NqKnwC137O1vZY5an5MjLdVR7EOzPJn8EDvAsZYDH-.WTvA7aFP72qy0KBB

Passcode: snp#sHL1

Best regards,

Dennis Yu

While visiting another client in Boca Raton, Lisa stopped by to visit myself, Parker, and Danny - young adults who also believed in the mission of helping local service businesses. In her own words, our conversation and advice was "wonderful".

lisatmiller4@gmail.com to 668sierra, me, danny -

> Dennis, Danny and Parker---It was really wonderful to spend time with you today. I appreciate your willingness to talk and share knowledge and get to know each other.

> I am going to do more research on a niche—I do agree that Functional Medicine is a solid opportunity and makes a lot of sense considering my background.

There is someone in this space - but I am not overly concerned -

https://www.functionalmedicineseo.com/

Thoughts?

Thank you in advance for your advice. Looking forward to working with you on projects and referrals. -Lisa

On May 9th, 2024 Lisa T. Miller reached out again requesting to be enrolled in our AYG certification program for \$10,000. The program offerings included the basics to grow her digital marketing agency by conducting Are You Googleable audits.



Dennis Yu <668sierra@gmail.com>

Thu, May 9, 10:16 AM ☆ ← :



to lisatmiller4, me -

Lisa-- I think you would be nearly ideal for our program.

The only bit you're missing is you don't have a base of local service clients and a team of VAs yet. But I think we can overcome that quickly.

Yes on checking out that link and coordinating with Parker so we can get all the right pieces in place for you to be the queen in medical LSA.

Best regards,

Dennis Yu

http://www.linkedin.com/in/dennisyu

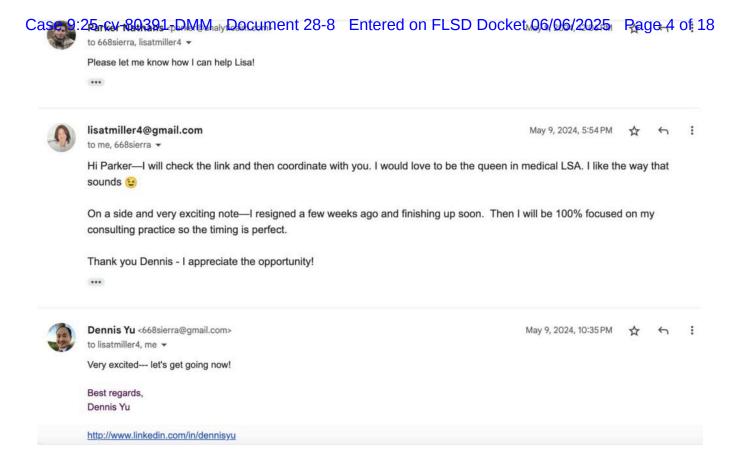
Psst... Are you a local business? Get step-by-step lead gen training or have us do it for you-- your choice! Reply here and I'm happy to answer your questions.

On Thu, May 9, 2024 at 4:10 AM < lisatmiller4@gmail.com > wrote:

Good morning Dennis - Please let me know how, when I can jump in and whats most appropriate in this scenario.

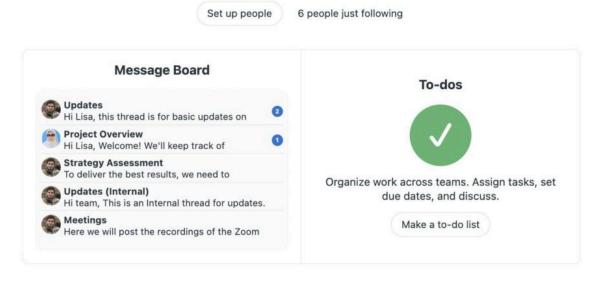
Also—I would love to be part of the first certification program. I saw the FB post. Should I go from that link to apply?

Thank you!



Within 24 hours of her paying our team, we setup her Basecamp account (where should could message our team) and have access to all of our trainings and support.

Clients 2 - AYG Agency: Lisa Miller (Medical LSA)



The requirements, time commitment, and obligations were clear from the start and she knew the responsibilities. The problems began shortly thereafter in emails not being answered, site updates we recommended not being completed, and meetings being ignored.

As you can see in the email below, we were practically spoonfeeding her solid leads.

Case 8:25 CM 80391 DMM Document 28-8 Entered on FLSD Docket 06/06/2025 Page 5 of 18

Cc: Parker Nathans cparker@analyticaim.com>
Subject: Re: DigiMarCon programs - Medical LSAs

Lisa-- you ready?

I've got some medical companies for you.

Best regards, Dennis Yu

http://www.linkedin.com/in/dennisyu

Psst... Are you a local business? Get step-by-step lead gen training or have us do it for you-- your choice! Reply here and I'm happy to answer your questions.

On Fri, May 10, 2024 at 3:44 AM Dennis Yu <668sierra@gmail.com> wrote:

Lisa,

Please publish this list of 20 medical LSA on your site. And over time, we'll build out pages for each category.

We can also get your agency site and personal brand site set up, too-- less foundational or technical work for you.

As well as drive leads for you, which is a nice perk of our agency program, but not the main benefit.

Best regards,

Dennis Yu

We even invited Lisa out to a private mastermind in Dallas - which she happily took advantage of.



lisatmiller4@gmail.com

to 668sierra, me 🕶

I can't even believe I made this possible with the short timeframe - but everything fell into place easily and quickly!!

I have a flight out very early Monday am – get in at 9am in Dallas and leave late on Tuesday at 730pm – arrive back in Florida at 11:30pm. I have people to help me when I am gone...

May 17, 2024, 5:36 AM ☆ ←

I will try to see if I can get in on Sunday night....

This is great!!

From: Dennis Yu <668sierra@gmail.com>
Sent: Friday, May 17, 2024 8:27 AM

To: lisatmiller4@gmail.com

Cc: Parker Nathans parker@analyticaim.com>
Subject: Re: DigiMarCon programs - Medical LSAs

Get in Sunday night and leave Tuesday around 8 pm if you can.

Best regards, Dennis Yu

During this private mastermind with Roger Wakefield, <u>Parker Nathans</u>, and <u>Danny Leibrandt</u>, we discussed the responsibilities of all those involved. That Parker, Danny, and Lisa would have different verticals and would follow the blueprint in our courses.

Case 9:25-cy-80391-DMW Document 28-8. Entered on FLSD Docket 06/06/2025 Page of 18

being made, and our weekly Office Hours (where she could get 1-1 support) weren't being attended.

Instead, she preferred to message me 1-1 and outright not follow our very clear instructions.

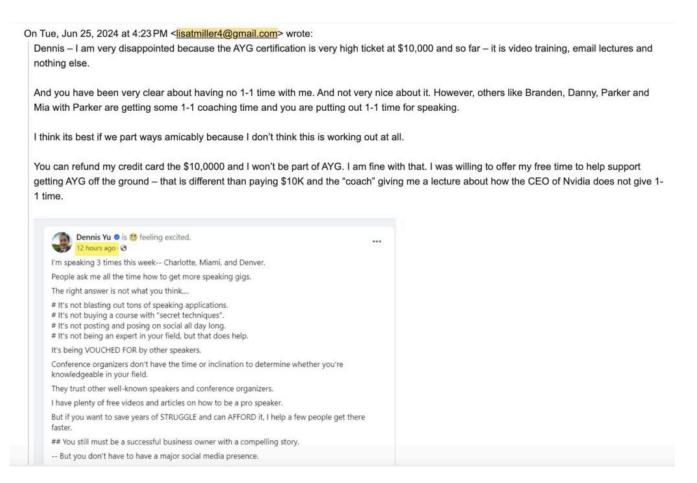
In addition to our structured program, I personally went above and beyond to help Lisa grow her digital marketing agency. This included:

- Lining up speaking opportunities for her.
- Creating marketing assets specifically tailored to her needs.
- Inviting her to exclusive masterminds.
- Allowing her access to our weekly coaching calls (which she rarely attended).

She also got to keep all materials, training, resources, and time we provided free of charge. Despite her lack of participation, our team continuously reached out to support her growth.

There is not one part of our program we didn't fulfill for her- and we stand proudly behind what we've done for her, whether she acknowledges it or not- or is even aware of it (see the many messages our team sent her where she wouldn't or couldn't respond).

On June 25th, 2024 she sent us an email requesting a full refund for her \$10,000 she spent with us months ago.



Lisa Miller's argument was that I was giving too much 1-1 support to others instead of her – despite the fact that she never attended our office hours or followed our very clear instructions.

Case 9:25-cy-80391-DMM he pocument 28-8 with me in Flash Docket 06/06/2025, Page 7 of 18

Lisa's world, *she was willing to offer us her time*, even though she's never successfully grown any agency before and was a massive time waster on our end.



Dennis Yu <668sierra@gmail.com>

to lisatmiller4, me, Danny, Operations -

Hi Lisa

There are reasonable limitations on one-on-one coaching.

While you are free to voice your opinion, if you don't respect your coach, they can't help you.

We have all been doing our best to help you succeed-- and still believe you can succeed.

But you have to be willing to abide by principles that many successful digital agencies operate on-- not just our group, but Josh Nelson, Digital Marketer, Hite Digital, and so forth.

I understand you are frustrated and feel offended.

We have met on your situation several times and decided each time to look the other way-- since you are sincere and do have a lot of experience, which includes an exit.

But if you really want to leave, this is your choice.

The post above is for getting people on stages.

That was what I offered to you a week ago, but there was no response-- which is fine.

Coaching people to be on stage is more intimate than running an agency.

The former is about one person performing on stage, while the latter is about setting up a system that doesn't rely upon you.

But I don't have to have to explain this each time or be second guessed.

Certainly, if you don't understand, it's okay to ask.

I'd just ask you to consider how your behavior looks to everyone else.

Again, we've met several times to discuss and we'd like to see you win.

In response to my email, Lisa bizarrely points to Mia Jenkins, the daughter of my friend Jeremy who runs <u>Crown Restoration</u>, a restoration company in San Antonio. Unlike Lisa, Mia wants to help her dad run Crown Restoration and has attended Office Hours with our team and followed our steps.

According to Lisa T. Miller, my email was "bullying", and that I was trying to shame her.



lisatmiller4@gmail.com

to 668sierra, me, Danny, Operations 🕶

Jun 25, 2024, 6:45 PM 🚓

Jun 25, 2024, 6:22 PM 💠

Dennis – We have not met several times on the certification program – I disagree. You brought on Mia – she received training that I could have been on and I asked professionally and it was another long winded dissertation and constant non-answering the basic question. I wanted to be included in the AYG training you were providing someone else as that makes sense. Remember the email you sent me on not having 1-1s but better to have the discussions with a group???

This is toxic – and it doesn't stop. This is a bullying email and you trying to shame me – that's on you not me on how this looks to everyone – so ridiculous you would pull that. I have never had a work or professional experience like this.

Yes please refund me to the credit card I paid on. Thanks, Lisa

Even though at this point we've already lost thousands of dollars in potential clients (since she didn't follow our steps or attend any meetings), I offered her a 50% refund as an incredible act of kindness.

to lisatmiller4, me, Danny, Operations -

Given how much effort we have put into you and that we have honored our part, we are willing to give you a 50% refund. I understand you are angry and have taken an accusatory, negative tone.

Of course, we don't tolerate this, no matter who you are or how important you believe you are, period.

I provided my recommendations to you, which you rejected each time.

That's totally your choice-- but you're not going to be able to talk down to me or make up things not true.

For the record, I've not met with Mia personally-- and have not even seen her in person.

Danny and Parker were friends before we officially launched the program.

You can see from the email threads that I've patiently responded to you in detail, but that you've skipped the logic--- choosing instead to focus on emotion and perceived outrage.

Again, your choice-- and it definitely is toxic.

On that we all agree-- your behavior is ridiculous.

If we didn't provide you with coaching, didn't put time into you and your project, and didn't care about your success, then you'd be justified to ask for a full refund.

But just because you feel offended doesn't automatically make us "bad"-- any more than yelling at the scale.

Let us know if you want us to process a 50% refund as an extraordinary gesture of kindness and we can be done.

Best regards,

Dennis Yu

You can guess how the rest of our conversion went. Accusatory, and pretending like she gave AYG "resources". Keep in mind, Lisa has had access to all of our training from the beginning which she never watched or used. Mia did not get any extra training.

Lisa then proceeds to threaten us with a lawsuit.



lisatmiller4@gmail.com

to Roger, 668sierra, me, Danny, Operations 🕶

Jun 25, 2024, 7:00 PM ☆ ←

No Dennis 50% refund is completely unacceptable—I have not been given significant training and now not part of the AYG program. In fact – I gave you and AYG a lot of resources and time that was invested in the startup and support of AYG. Which would be clearly evident in a deposition.

I never said you gave Mia the training—I said she was given training. I never had that opportunity. And I asked for it – and it was drama and still at the end of day – no access or updates on how to get that training.

I don't think you want any legal issues. I want the full refund. I will accept 50% refund payment now and 50% refund payment next month.

to lisatmiller4, Roger, me, Danny, Operations -

You've had access to training all along.

Even though that's not the main value of a certification, we happily provided it when you asked.

We don't want legal issues, either.

But again, that is your call if you want to threaten and go down that path.

Find a good lawyer and ask them what it costs to get through discovery-- even before it gets to a trial.

They will tell you the options and cost-- not me.

Have them send a demand letter if you like.

If you are mad about Mia, who you should never compare with anyway-- consider that she is going through the courses in the Academy to implement. And the results are coming through for her initial client-- her father's business.

Can't believe you're still stuck on Mia-- who has gotten far less attention and time from me than you.

If anything, she should be jealous of how much more time we've been putting into helping you.

Imagine if you put your focus into results instead of this silly game.

Everyone else here is serious about growing their agency and driving results for clients.

If they wanted to, they could instead spend all their time coming up with excuses and blame everyone except themselves.

But they focused on their business and are highly coachable.

We are highly principled and aren't going to budge on this.

It's all documented, as you know.

Your call.

Best regards,

Dennis Yu

Lisa continues her meltdown by not only threatening me personally – but our entire team who's poured countless hours into trying to get her to perform what's documented in our training.



lisatmiller4@gmail.com

to 668sierra, Roger, me, Danny, Operations 🕶



Dennis most of the training was available through content I had access to. The AYG certification is a lot more than that. Shameful you would offer 50%. I don't have a problem with getting legal involved and esp for principle sake – because you are 100% wrong. I am longer able to get the value and work from being certified. Its not all the training which there wasn't anything special about that.

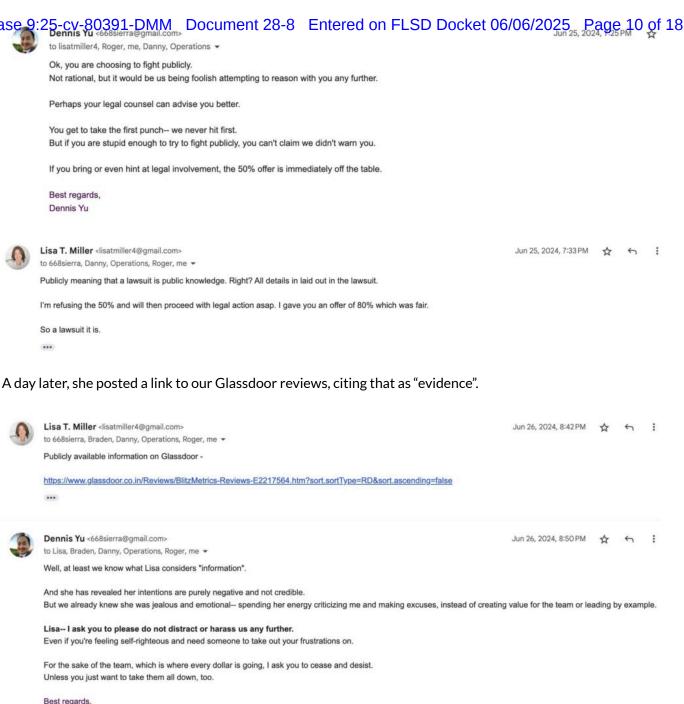
So I am in for more than a demand letter-it will be a lawsuit that comes your way first and corp AYG. And a public fight if necessary.

I will accept 80% and then I am done. Not a penny less. 50% is not ethical – which appears to go against the railing you do against the marketing agencies that don't give full value.

You did not give 50% value - and you know that.

Refund \$8,000 I am done.

Despite her threatening the livelihoods of people that work with us – I offered her one last chance to take the 50%.



Best regards

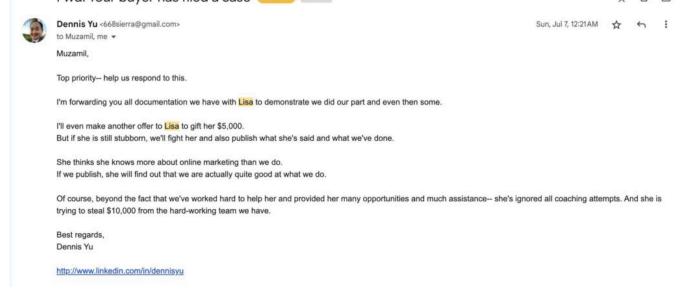
Dennis Yu



···

This "lawsuit" never materialized, of course. Probably because she knew she was being dramatic and had no proof that she had been defrauded. Instead, she went to Paypal directly and put in a payment dispute in a last ditch effort to get \$10,000 from our team.

Jun 26, 2024, 8:59 PM ☆ ←



For context on Paypal disputes, Paypal tends to side with the buyer 90% of the time. Unless your case is rock solid, the buyer almost always wins. Never-the-less, we submitted our evidence to Paypal which you can read here:

Dear PayPal Resolution Center,

We are writing to respond to the dispute filed by Lisa T. Miller regarding the \$10,000 transaction for the Are You Googleable (AYG) agency certification program.

Lisa T. Miller enrolled in the Are You Googleable (AYG) certification program for \$10,000. The program offerings are clearly stated at blitzmetrics.com/aygc, which is to put in place the

foundations for her to grow her digital marketing agency by doing Are You Googleable audits. We have fulfilled the items from this program, as detailed in this document— to help her grow her agency, build her website, put her on stages, continue to provide her with medical leads (the goal of the agency program), and so forth.

We have successfully helped over 25 digital agencies start and grow in our 6 phase program in the last 3 years. We've had 3 failures, which is about a 10% failure rate, largely due to participants being unable or unwilling to complete the exercises required on their end. We do our part— which is to train them, guide them, set them up with a LIGHTHOUSE (respected firm in their niche), build their website, promote their brand, and see them grow. In particular, they must be able to perform the Are You Googleable Audit, since all our agencies run this audit and fix items identified from this audit. Lisa has been unwilling to do this, despite our encouragement and the business leads we provided her.

- She has not shown up to the weekly coaching sessions that are on Thursdays at 2 pm PST, which are key to being able to progress.
- She completed the assignments on her end or responded to messages following up with her, as evidenced by the sporadic Weekly Status Reports she is supposed to provide every Friday.
- Her primary claims are that she didn't get access and that another coaching client is getting favorable treatment. Both of these are not true:
- She and her virtual assistant, Alexandra, got access within 24 hours of their request.
 The access we granted was complete
 – across all our modules and training, though she claims it was partial. Our logs verify that we granted her complete access.
- Ms. Miller claims that Mia Newman, another agency coaching client, was getting private
 one-on-one access with Dennis Yu. Mia has never had any private coaching sessions
 with Dennis Yu, though she did have a set-up call with Parker Nathans, since her father
 is a direct client

 not a coaching client.
- We even invited Ms. Miller to Dallas for a 3 day mastermind, which Mia didn't get access to.

Despite our efforts, Lisa expressed dissatisfaction and requested a full refund. We offered a 50% refund as a goodwill gesture, which Lisa rejected. Our client service team reviewed her case and are still willing to offer a \$5,000 gift to resolve the issue. As you

can see from the email threads, she is belligerent and not willing to abide by program rules, basic communication, or logic. We have expressed that we've been willing to help her grow her agency at every point, even now. But if she isn't willing to do the work or trust our expertise, it will be very hard to help her.

If you need any of the several dozen other emails or wish to talk to any of the other agencies in the program, discuss with our staff, we are available for you.

Best regards,

Dennis Yu

CEO, BlitzMetrics

As annoying as someone trying to steal \$10,000 from our team is – what's worse is that it froze our Paypal account. Meaning we couldn't process transactions from others who wanted to pay us.

Miraculously, Lisa's case against us was so empty that a few weeks later the case was resolved in our favor.



We've decided the case in your favor

This case was decided in your favor because your buyer was unable to provide the information we had requested. This case is now closed, but we still encourage you to work directly with your buyer to find a resolution.

If there was a hold on this transaction, it has been removed.

Transaction details

Case ID

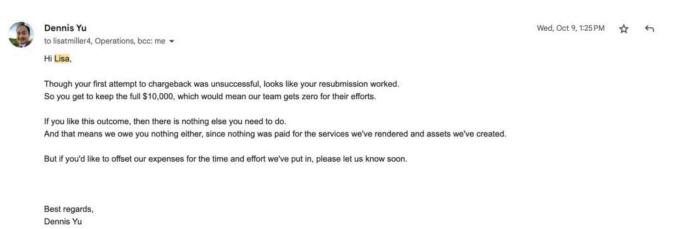
PP-R-IVE-531923769

Buyer's name

Lisa Miller



Unfortunately for us, Lisa continued to resubmit disputes on her end. And months later on her 5th attempt, Paypal decided in her favor anyways.



Dennis.

- Correction #1 the first attempt wasn't unsuccessful PayPal advised me to handle through my credit card as they don't handle these types of matters. It required me to resend directly to my credit card company.
- Correction #2 I don't know what services/assets you provided to me for the Are You Googleable Certification Program. On the contrary, I provided you with my services.

Remember I paid monthly for office hours for several months, before AYG - in which at your direction and your offering your team did do some very minor things.

I also paid you \$1,500 for a call.

I have paid for any little services/assets that were provided at your offering (and thus covered expenses) and this was before Are You Googleable Certification Program.

These are two separate issues.

The refund of \$10,000 for the AYG program is the right outcome as it was the right decision. I am satisfied with it. -Lisa

Lisa I.V Vu



Dennis Yu

to lisatmiller4, Operations, me -

Ok-- Lisa, thank you for confirming your point of view.

Team, please proceed.

Best regards, Dennis Yu

http://www.linkedin.com/in/dennisyu



lisatmiller4@gmail.com

to 668sierra, Operations, me -

Whatever Dennis. If this makes you feel better – go at it.

Oct 9, 2024, 3:23 PM

...

So there you have it. Lisa Miller has successfully stolen \$10,000 from our team, despite our months of helping her, flying her to masterminds, and inviting her on stage.

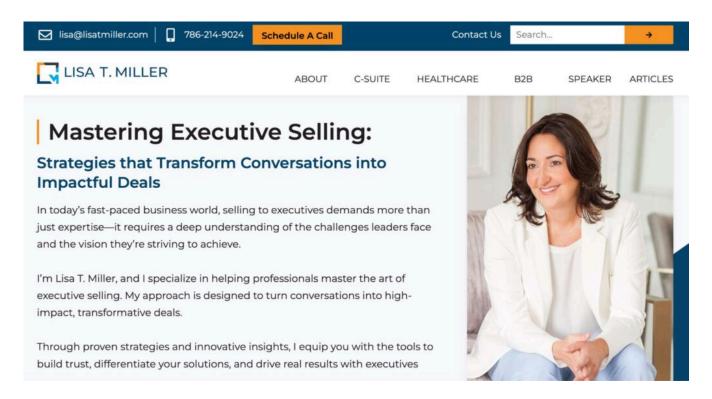
Her response was not cooperative. She accused us of bullying and threatened legal action, despite the months of effort we put into supporting her. Lisa eventually filed a dispute with PayPal, freezing our account and causing significant disruptions to our operations. And **she got 100% of her money back**.

What got her so furious was that she wanted to be a part of another client's private conversations – to which we said it wasn't relevant to her nor did we have permission from that other client. You can see everything was going well prior to this emotional tantrum. After multiple disputes and a final decision in her favor, she managed to reclaim \$10,000 from our team.

Case 9:25 ray Par has decided in her favor after multiple disputes, we have little hope of recouping our money. So 18 instead, we've decided to publish an article outlining exactly how Lisa T. Miller operates when working with

After failing in her niche for healthcare providers, it appears that she's now working in "mastering executive selling" – using the same website template we built for her for no free (which other companies sell for \$5k+).

other businesses.



The point of this article is to rank on Lisa T. Miller's name and show others the kind of behavior she has towards businesses she works with. If you're planning on working with Lisa, be aware that this is how she operates and don't expect her to be reliable or trustworthy.

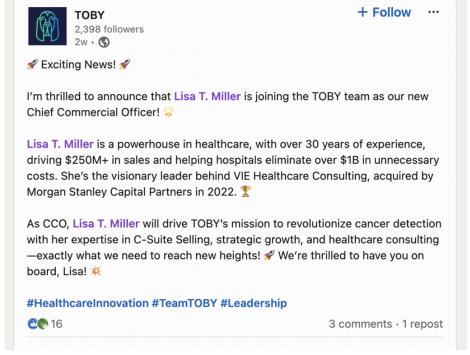
The long-lasting effects of Lisa's temper tantrum still harm our team. Our Paypal account has yet to be restored, meaning we've had to find alternative ways to pay our employees and team-members.

She privately messaged Danny, one of our young adults, in a way which was vaguely threatening saying "I'm surprised that you have been silent about this. I would have expected better of you..."

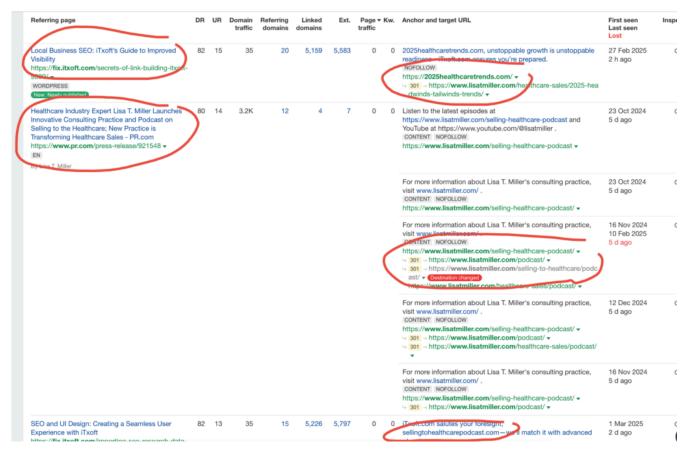
Was this supposed to be a threat? Considering she's already threatened legal action against me personally, is she targeting 20 year old agency owners as well?

Lisa, if you're reading this, there's still time to make things right and refund the \$10,000 to our team. If not for me personally, than for the young adults and our employees who've spent countless hours trying to train you.

Update: It looks like Lisa has been added as the "CCO" of TOBY, a company which claims to help detect prostate cancer in urine. If true, would be a very bad decision on their end given Lisa's history.



Recently, it has come to our attention that Lisa Miller is blatantly buying PR and SEO links in an apparent bid to establish herself as a thought leader in healthcare. This tactic appears to be a deliberate strategy to manipulate public perception and boost her credibility online.



Lisa Miller blatantly buying PR and SEO links

Case 8:25 Fix Y 1803 21 - DMM POS HONE A takedown for using the photo, and satisfied the photo of the photo o

from the internet. So respecting her wishes, we've replaced her earlier photo with the updated version at the top of the article.

Dear Customer.

WP Engine received a complaint alleging that content on your website(s) infringes the copyright(s) of a third party. In accordance with 17 U.S.C. § 512 (the Digital Millennium Copyright Act or "DMCA"), please remove the content or WPE will be required to remove the reported content within the next 24 hours. You will have access to any backups in line with our standard retention periods.

The content in question is located at:

https://blitzmetrics.com/how-lisa-t-miller-stole-10000-from-our-team/

For information about DMCA, our obligations, and your rights under the law, please visit https://www.copyright.gov/512/. You may also wish to consult a lawyer. If you believe your content has been removed in error, you may reply to this email with a counter-notice in the form described under DMCA § 512(g)(3). If you believe the referenced content is unintentionally being displayed please contact WP Engine support or Flywheel support via your user portal or email legal@wpengine.com.

Thank you,

WPEngine Legal

Lisa Filing a DMCA Takedown Request



Dennis Yu



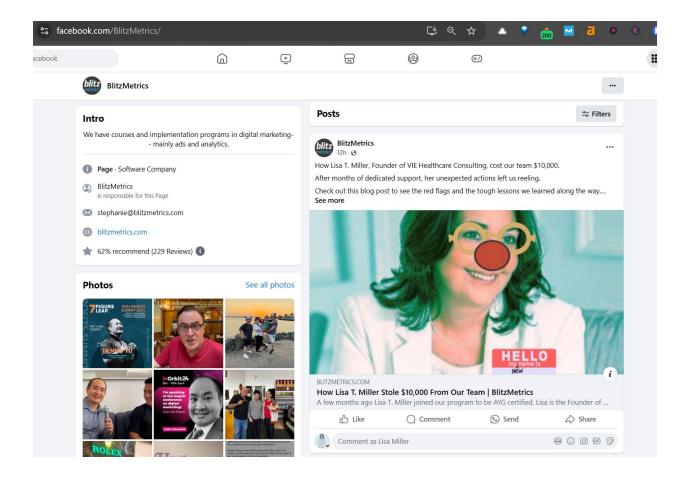








Dennis Yu is a former search engine engineer who has spent a billion dollars on Google and Facebook ads for Nike, Quiznos, Ashley Furniture, Red Bull, State Farm, and other organizations that have many locations. He has achieved 25% of his goal of creating a million digital marketing jobs because of his partnership with universities, professional organizations, and agencies. Companies like GoDaddy, Fiverr, onlinejobs.ph, 7 Figure Agency, and Vendasta partner with him to create training and certifications. Dennis created the Dollar a Day Strategy for local service businesses to enhance their existing local reputation and make the phone ring. He's coaching young adult agency owners who serve plumbers, AC technicians, landscapers, roofers, electricians in conjunction with leaders in these industries. Mr. Yu believes that there should be a standard in measuring local marketing efforts, much like doctors and plumbers need to be certified and licensed. His Content Factory training and dashboards are used by thousands of practitioners.













BlitzMetrics's Post



How Lisa T. Miller, Founder of VIE Healthcare Consulting, cost our team \$10,000.

After months of dedicated support, her unexpected actions left us reeling.

Check out this blog post to see the red flags and the tough lessons we learned along the way.



BLITZMETRICS.COM

How Lisa T. Miller Stole \$10,000 From Our Team | BlitzMetrics

A few months ago Lisa T. Miller joined our program to be AYG certified. Lisa is the Founder of VIE ...



Like



Comment



Send



Share



Comment as Lisa Miller



?

How Lisa T. Miller Took \$10,000 From Our Team



by **DENNIS YU** / November 14, 2024



Lisa T. Miller

A few months ago Lisa T. Miller joined our program to be <u>AYG certified</u>. Lisa is the Founder of VIE Healthcare Consulting and showed interest in joining our paid program for agency owners in different verticals.

The goal for this program was to build local service agencies who can serve various niches that are in an <u>LSA category</u>. With her healthcare consulting background, we figured this could be the perfect opportunity to help build her agency.

Shortly after we announced the program's creation - she reached out and expressed interest in joining.

Hi Dennis – I am not being a pest 19..... definitely want to be part of your certification.

I am helping a friend of mine who owns a local massage therapy company who also provides PEMF therapy (which is amazing). I am not charging for anything but just giving her some ideas about her website. I was on a call with her website company and had to persuade them to use WordPress vs Wix (I showed by friend the video with you and the plumber) and she was able to support that is as what she wanted. So the website guy conceded and is building her new site on wordpress.

I also shared some SEO ideas and using PAA and videos. Mike, her website developer and his designer said no way to videos and just keep the slider of stock images.... I was shocked and so was my friend who owns the business. And this is the website guy locally here in Palm Beach Gardens area that is the go-to person and he is very busy (very busy putting people on Wix sites and giving bad SEO advice).

I want to provide great and highly effective SEO services to local businesses here in Florida. My friend needs the work and yet she is an amazing therapist.

So two things---should I schedule a paid hour call with you via your website and/or wait for your announcement for the certification?

Thank you! As I said before---I love what you are doing to help so many people. -Lisa

Everything seemed clear on our end. This was someone who we believed would take our program and succeed, especially with her background in medical sales.



Dennis Yu <668sierra@gmail.com> to lisatmiller4, me, Will -

Mar 8, 2024, 5:06 PM



Lisa--- great spending time together with you today.

You're a champion of stopping runaway waste in healthcare marketing-- getting accountability and performance in place.

You might consider what Marko and I have done in home services, as the same 5 steps apply. Very easy to make the same video plus corresponding article, landing page, audit, etc:

https://www.youtube.com/watch?v=fnqeiWuYPol

Here is the recording of our call:

https://us02web.zoom.us/rec/share/BUtu0_xrtLUnCC1tL6m808NgKnwC137O1vZY5an5MjLdVR7EOzPJn8EDvAsZYDH-.WTvA7aFP72qy0KBB

Passcode: snp#sHL1

Best regards, Dennis Yu

While visiting another client in Boca Raton, Lisa stopped by to visit myself, and Danny - young adults who also believed in the mission of helping local service businesses. In her own words, our conversation and advice was "wonderful".

Case 9:25-cv-80391-DMM Document 28-11 Entered on FLSD Docket 06/06/2025 Page 3 of 20

lisatmiller4@gmail.com
to 668sierra, me, danny •

Dennis, Danny and Parker---It was really wonderful to spend time with you today. I appreciate your willingness to talk and share knowledge and get to know each other.

I am going to do more research on a niche—I do agree that Functional Medicine is a solid opportunity and makes a lot of sense considering my background.

There is someone in this space - but I am not overly concerned -

https://www.functionalmedicineseo.com/

Thoughts?

Thank you in advance for your advice. Looking forward to working with you on projects and referrals. -Lisa

On May 9th, 2024 Lisa T. Miller reached out again requesting to be enrolled in our AYG certification program for \$10,000. The program offerings included the basics to grow her digital marketing agency by conducting Are You Googleable audits.



Dennis Yu <668sierra@gmail.com>

Thu, May 9, 10:16 AM

1

to lisatmiller4, me -

Lisa -- I think you would be nearly ideal for our program.

The only bit you're missing is you don't have a base of local service clients and a team of VAs yet. But I think we can overcome that quickly.

Yes on checking out that link and coordinating with Parker so we can get all the right pieces in place for you to be the queen in medical LSA.

Best regards,

Dennis Yu

http://www.linkedin.com/in/dennisyu

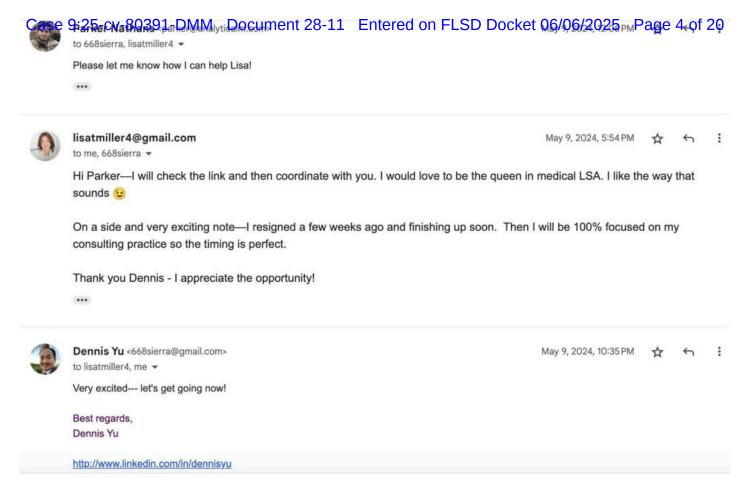
Psst... Are you a local business? Get step-by-step lead gen training or have us do it for you-- your choice! Reply here and I'm happy to answer your questions.

On Thu, May 9, 2024 at 4:10AM < lisatmiller4@gmail.com > wrote:

Good morning Dennis - Please let me know how, when I can jump in and whats most appropriate in this scenario.

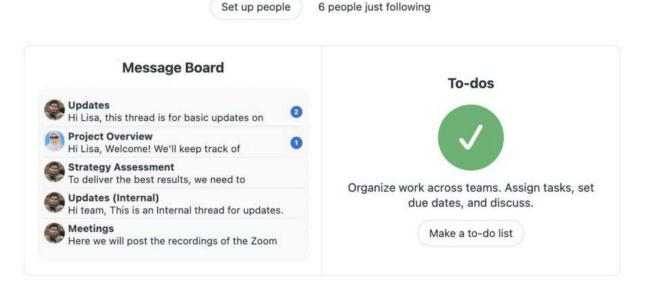
Also—I would love to be part of the first certification program. I saw the FB post. Should I go from that link to apply?

Thank you!



Within 24 hours of her paying our team, we setup her Basecamp account (where should could message our team) and have access to all of our trainings and support.

Clients 2 - AYG Agency: Lisa Miller (Medical LSA)



The requirements, time commitment, and obligations were clear from the start and she knew the responsibilities. The problems began shortly thereafter in emails not being answered, site updates we recommended not being completed, and meetings being ignored.

As you can see in the email below, we were practically spoonfeeding her solid leads.

Case 9:25 is a smile 4 gmail COMM Document 28-11 Entered on FLSD Docket 06/06/2025 Page 5 of 20

Cc: Parker Nathans
parker@analyticaim.com>
Subject: Re: DigiMarCon programs - Medical LSAs

Lisa-- you ready?

I've got some medical companies for you.

Best regards, Dennis Yu

http://www.linkedin.com/in/dennisyu

Psst... Are you a local business? Get step-by-step lead gen training or have us do it for you-- your choice! Reply here and I'm happy to answer your questions.

On Fri, May 10, 2024 at 3:44 AM Dennis Yu <668sierra@gmail.com> wrote:

Lisa,

Please publish this list of 20 medical LSA on your site. And over time, we'll build out pages for each category.

We can also get your agency site and personal brand site set up, too-- less foundational or technical work for you. As well as drive leads for you, which is a nice perk of our agency program, but not the main benefit.

Best regards, Dennis Yu

We even invited Lisa out to a private mastermind in Dallas - which she happily took advantage of.



lisatmiller4@gmail.com

to 668sierra, me ▼

I can't even believe I made this possible with the short timeframe – but everything fell into place easily and quickly!!

I have a flight out very early Monday am – get in at 9am in Dallas and leave late on Tuesday at 730pm – arrive back in Florida at 11:30pm. I have people to help me when I am gone...

May 17, 2024, 5:36 AM

I will try to see if I can get in on Sunday night....

This is great!!

From: Dennis Yu <668sierra@gmail.com>

Sent: Friday, May 17, 2024 8:27 AM

To: lisatmiller4@gmail.com

Cc: Parker Nathans cc: Parker Nathans parker@analyticaim.com
Subject: Re: DigiMarCon programs - Medical LSAs

Get in Sunday night and leave Tuesday around 8 pm if you can.

Best regards, Dennis Yu

During this private mastermind with Roger Wakefield, and <u>Danny Leibrandt</u>, we discussed the responsibilities of all those involved. That Danny, and Lisa would have different verticals and would follow the blueprint in our courses.

Arter our meeting - things went dark on Lisa's side. Emails weren't responded to, website changes weren't being f 20 made, and our weekly Office Hours (where she could get 1-1 support) weren't being attended.

Instead, she preferred to message me 1-1 and outright not follow our very clear instructions.

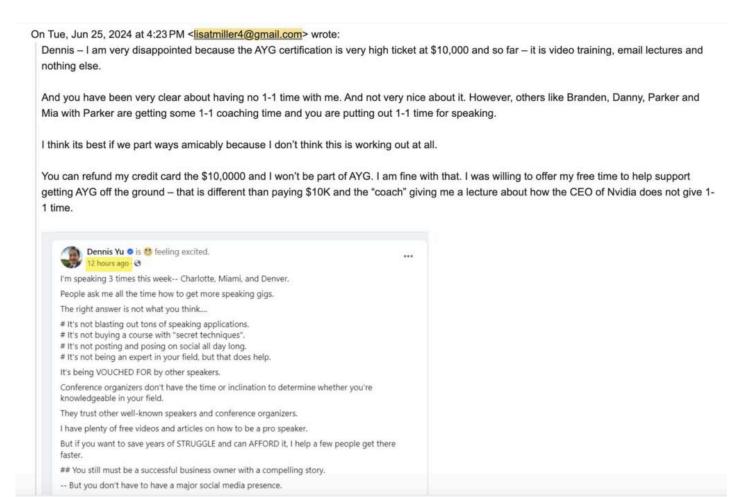
In addition to our structured program, I personally went above and beyond to help Lisa grow her digital marketing agency. This included:

- Lining up speaking opportunities for her.
- Creating marketing assets specifically tailored to her needs.
- Inviting her to exclusive masterminds.
- Allowing her access to our weekly coaching calls (which she rarely attended).

She also got to keep all materials, training, resources, and time we provided free of charge. Despite her lack of participation, our team continuously reached out to support her growth.

There is not one part of our program we didn't fulfill for her- and we stand proudly behind what we've done for her, whether she acknowledges it or not- or is even aware of it (see the many messages our team sent her where she wouldn't or couldn't respond).

On June 25th, 2024 she sent us an email requesting a full refund for her \$10,000 she spent with us months ago.



Lisa Miller's argument was that I was giving too much 1- Estipped to others instead of her despite the fact that she never attended our office hours or followed our very clear instructions.

This was despite me inviting her to speak on stage with me in Florida, which she didn't even reply to. But in Lisa's world, *she was willing to offer us her time*, even though she's never successfully grown any agency before and was a massive time waster on our end.



Dennis Yu <668sierra@gmail.com> to lisatmiller4, me, Danny, Operations ▼ Jun 25, 2024, 6:22 PM 🕏





:

Hi Lisa,

There are reasonable limitations on one-on-one coaching.

While you are free to voice your opinion, if you don't respect your coach, they can't help you.

We have all been doing our best to help you succeed-- and still believe you can succeed.

But you have to be willing to abide by principles that many successful digital agencies operate on-- not just our group, but Josh Nelson, Digital Marketer, Hite Digital, and so forth.

I understand you are frustrated and feel offended.

We have met on your situation several times and decided each time to look the other way-- since you are sincere and do have a lot of experience, which includes an exit.

But if you really want to leave, this is your choice.

The post above is for getting people on stages.

That was what I offered to you a week ago, but there was no response-- which is fine.

Coaching people to be on stage is more intimate than running an agency.

The former is about one person performing on stage, while the latter is about setting up a system that doesn't rely upon you.

But I don't have to have to explain this each time or be second guessed.

Certainly, if you don't understand, it's okay to ask.

I'd just ask you to consider how your behavior looks to everyone else.

Again, we've met several times to discuss and we'd like to see you win.

In response to my email, Lisa bizarrely points to Mia Jenkins, the daughter of my friend Jeremy who runs <u>Crown</u> <u>Restoration</u>, a restoration company in San Antonio. Unlike Lisa, Mia wants to help her dad run Crown Restoration and has attended Office Hours with our team and followed our steps.

According to Lisa T. Miller, my email was "bullying", and that I was trying to shame her.



lisatmiller4@gmail.com

to 668sierra, me, Danny, Operations 🕶

Jun 25, 2024, 6:45 PM 🏠 🥎

Dennis – We have not met several times on the certification program – I disagree. You brought on Mia – she received training that I could have been on and I asked professionally and it was another long winded dissertation and constant non-answering the basic question. I wanted to be included in the AYG training you were providing someone else as that makes sense. Remember the email you sent me on not having 1-1s but better to have the discussions with a group???

This is toxic – and it doesn't stop. This is a bullying email and you trying to shame me – that's on you not me on how this looks to everyone – so ridiculous you would pull that. I have never had a work or professional experience like this.

Yes please refund me to the credit card I paid on. Thanks, Lisa

Case 9:25-cy-80391-DMM Document 28-11 Fintered on FLSD Docket 06/06/2025 Plage 8 of 20 even though at this point we've already lost thousands of dollars inpotential clients (since she didn't follow our steps or attend any meetings), I offered her a 50% refund as an incredible act of kindness.



Dennis Yu <668sierra@gmail.com> to lisatmiller4, me, Danny, Operations ▼ Jun 25, 2024, 6:52 PM

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Given how much effort we have put into you and that we have honored our part, we are willing to give you a 50% refund. I understand you are angry and have taken an accusatory, negative tone.

Of course, we don't tolerate this, no matter who you are or how important you believe you are, period.

I provided my recommendations to you, which you rejected each time.

That's totally your choice-- but you're not going to be able to talk down to me or make up things not true.

For the record, I've not met with Mia personally-- and have not even seen her in person.

Danny and Parker were friends before we officially launched the program.

You can see from the email threads that I've patiently responded to you in detail, but that you've skipped the logic--- choosing instead to focus on emotion and perceived outrage.

Again, your choice-- and it definitely is toxic.

On that we all agree-- your behavior is ridiculous.

If we didn't provide you with coaching, didn't put time into you and your project, and didn't care about your success, then you'd be justified to ask for a full refund.

But just because you feel offended doesn't automatically make us "bad"-- any more than yelling at the scale.

Let us know if you want us to process a 50% refund as an extraordinary gesture of kindness and we can be done.

Best regards,

Dennis Yu

You can guess how the rest of our conversion went. Accusatory, and pretending like she gave AYG "resources". Keep in mind, Lisa has had access to all of our training from the beginning which she never watched or used. Mia did not get any extra training.

Lisa then proceeds to threaten us with a lawsuit.



lisatmiller4@gmail.com

to Roger, 668sierra, me, Danny, Operations 🕶

Jun 25, 2024, 7:00 PM





. .

No Dennis 50% refund is completely unacceptable—I have not been given significant training and now not part of the AYG program. In fact – I gave you and AYG a lot of resources and time that was invested in the startup and support of AYG. Which would be clearly evident in a deposition.

I never said you gave Mia the training—I said she was given training. I never had that opportunity. And I asked for it – and it was drama and still at the end of day – no access or updates on how to get that training.

I don't think you want any legal issues. I want the full refund. I will accept 50% refund payment now and 50% refund payment next month.

to lisatmiller4, Roger, me, Danny, Operations -

You've had access to training all along

Even though that's not the main value of a certification, we happily provided it when you asked.

We don't want legal issues, either.

But again, that is your call if you want to threaten and go down that path.

Find a good lawyer and ask them what it costs to get through discovery-- even before it gets to a trial.

They will tell you the options and cost-- not me.

Have them send a demand letter if you like.

If you are mad about Mia, who you should never compare with anyway-- consider that she is going through the courses in the Academy to implement. And the results are coming through for her initial client-- her father's business.

Can't believe you're still stuck on Mia-- who has gotten far less attention and time from me than you.

If anything, she should be jealous of how much more time we've been putting into helping you.

Imagine if you put your focus into results instead of this silly game.

Everyone else here is serious about growing their agency and driving results for clients.

If they wanted to, they could instead spend all their time coming up with excuses and blame everyone except themselves.

But they focused on their business and are highly coachable.

We are highly principled and aren't going to budge on this.

It's all documented, as you know.

Your call.

Best regards,

Dennis Yu

Lisa then sent messages that our team perceived as increasingly hostile, including direct threats of legal action against myself and our team—despite our continued efforts to support her progress through the program.



lisatmiller4@gmail.com

to 668sierra, Roger, me, Danny, Operations ▼

Dennis most of the training was available through content I had access to. The AYG certification is a lot more than that. Shameful you would offer 50%. I don't have a problem with getting legal involved and esp for principle sake – because you are 100% wrong. I am longer able to get the value and work from being certified. Its not all the training which there wasn't anything special about that.

Jun 25, 2024, 7:19 PM

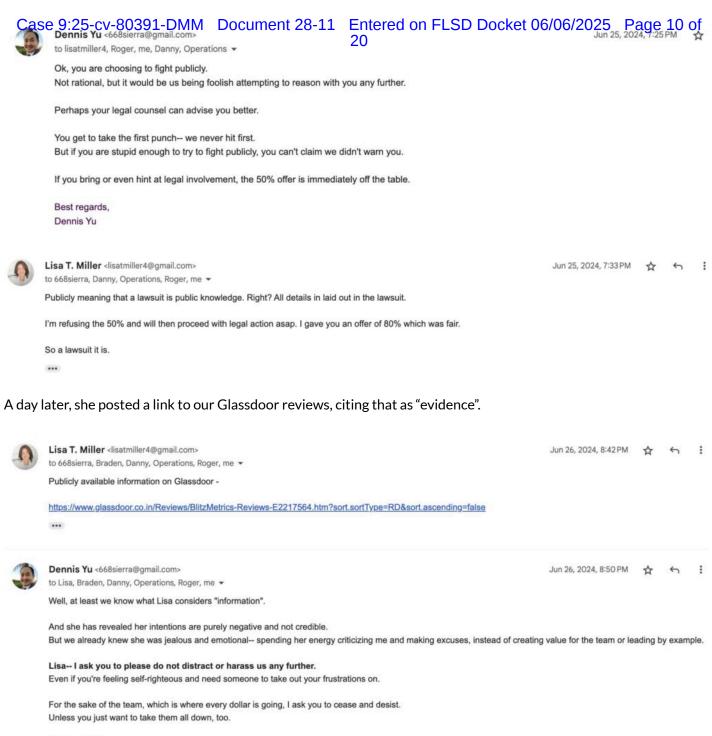
So I am in for more than a demand letter-it will be a lawsuit that comes your way first and corp AYG. And a public fight if necessary.

I will accept 80% and then I am done. Not a penny less. 50% is not ethical – which appears to go against the railing you do against the marketing agencies that don't give full value.

You did not give 50% value - and you know that.

Refund \$8,000 I am done.

Despite her threatening the livelihoods of people that work with us - I offered her one last chance to take the 50%.



Best regards,

Dennis Yu



This "lawsuit" never materialized, of course. Probably because she knew she was being dramatic and had no proof that she had been defrauded. Instead, she went to Paypal directly and put in a payment dispute in a last ditch effort to get \$10,000 from our team.

For context on Paypal disputes, Paypal tends to side with the buyer 90% of the time. Unless your case is rock solid, the buyer almost always wins. Never-the-less, we submitted our evidence to Paypal which you can read here:

Dear PayPal Resolution Center,

http://www.linkedin.com/in/dennisyu

We are writing to respond to the dispute filed by Lisa T. Miller regarding the \$10,000 transaction for the Are You Googleable (AYG) agency certification program.

Lisa T. Miller enrolled in the Are You Googleable (AYG) certification program for \$10,000. The program offerings are clearly stated at blitzmetrics.com/aygc, which is to put in place the

foundations for her to grow her digital marketing agency by doing Are You Googleable audits. We have fulfilled the items from this program, as detailed in this document— to help her grow her agency, build her website, put her on stages, continue to provide her with medical leads (the goal of the agency program), and so forth.

We have successfully helped over 25 digital agencies start and grow in our 6 phase program in the last 3 years. We've had 3 failures, which is about a 10% failure rate, largely due to participants being unable or unwilling to complete the exercises required on their end. We do our part—which is to train them, guide them, set them up with a LIGHTHOUSE (respected firm in their niche), build their website, promote their brand, and see them grow. In particular, they must be able to perform the Are You Googleable Audit, since all our agencies run this audit and fix items identified from this audit. Lisa has been unwilling to do this, despite our encouragement and the business leads we provided her.

- She has not shown up to the weekly coaching sessions that are on Thursdays at 2 pm
 PST, which are key to being able to progress.
- She completed the assignments on her end or responded to messages following up with her, as evidenced by the sporadic Weekly Status Reports she is supposed to provide every Friday.
- Her primary claims are that she didn't get access and that another coaching client is getting favorable treatment. Both of these are not true:
- She and her virtual assistant, Alexandra, got access within 24 hours of their request.
 The access we granted was complete— across all our modules and training, though she claims it was partial. Our logs verify that we granted her complete access.
- Ms. Miller claims that Mia Newman, another agency coaching client, was getting private
 one-on-one access with Dennis Yu. Mia has never had any private coaching sessions
 with Dennis Yu, though she did have a set-up call with Parker Nathans, since her father
 is a direct client

 not a coaching client.
- We even invited Ms. Miller to Dallas for a 3 day mastermind, which Mia didn't get access to.

Case 9:25-cv-80391-DMM Document 28-11 Entered on FLSD Docket 06/06/2025 Page 13 of

Despite our efforts, Lisa expressed dis isfaction and requested a full refund. We
offered a 50% refund as a goodwill gesture, which Lisa rejected. Our client service team
reviewed her case and are still willing to offer a \$5,000 gift to resolve the issue. As you

can see from the email threads, she is belligerent and not willing to abide by program rules, basic communication, or logic. We have expressed that we've been willing to help her grow her agency at every point, even now. But if she isn't willing to do the work or trust our expertise, it will be very hard to help her.

If you need any of the several dozen other emails or wish to talk to any of the other agencies in the program, discuss with our staff, we are available for you.

Best regards,

Dennis Yu

CEO, BlitzMetrics

As annoying as someone trying to take \$10,000 from our team is – what's worse is that it froze our Paypal account. Meaning we couldn't process transactions from others who wanted to pay us.

Miraculously, Lisa's case against us was so empty that a few weeks later the case was resolved in our favor.



We've decided the case in your favor

This case was decided in your favor because your buyer was unable to provide the information we had requested. This case is now closed, but we still encourage you to work directly with your buyer to find a resolution.

If there was a hold on this transaction, it has been removed.

Transaction details

Case ID

PP-R-IVE-531923769

Buyer's name

Lisa Miller



And to think that we offered her \$7,000 back as a free gift, even though we have provided excellent service all along. Muzamil, please update the documentation with this and share with the BBB.

Best regards, Dennis Yu

http://www.linkedin.com/in/dennisyu

Unfortunately for us, Lisa continued to resubmit disputes on her end. And months later on her 5th attempt, Paypal decided in her favor anyways.

Sat, Aug 10, 12:22 AM

Oct 9, 2024, 3:23 PM

Hi Lisa,

Though your first attempt to chargeback was unsuccessful, looks like your resubmission worked. So you get to keep the full \$10,000, which would mean our team gets zero for their efforts.

If you like this outcome, then there is nothing else you need to do.

And that means we owe you nothing either, since nothing was paid for the services we've rendered and assets we've created.

But if you'd like to offset our expenses for the time and effort we've put in, please let us know soon.

Best regards, Dennis Yu

On Wed, Oct 9, 2024 at 1:46 PM < lisatmiller4@gmail.com > wrote:

- 1. Correction #1 the first attempt wasn't unsuccessful PayPal advised me to handle through my credit card as they don't handle these types of matters. It required me to resend directly to my credit card company.
- 2. Correction #2 I don't know what services/assets you provided to me for the Are You Googleable Certification Program. On the contrary, I provided you with my services.

Remember I paid monthly for office hours for several months, before AYG - in which at your direction and your offering your team did do some very minor things.

I also paid you \$1,500 for a call.

I have paid for any little services/assets that were provided at your offering (and thus covered expenses) and this was before Are You Googleable Certification Program.

These are two separate issues.

The refund of \$10,000 for the AYG program is the right outcome as it was the right decision. I am satisfied with it. -Lisa



Dennis Yu

to lisatmiller4, Operations, me -

Ok- Lisa, thank you for confirming your point of view.

Team, please proceed.

Best regards, Dennis Yu

http://www.linkedin.com/in/dennisyu



lisatmiller4@gmail.com

to 668sierra, Operations, me -

Whatever Dennis. If this makes you feel better – go at it.



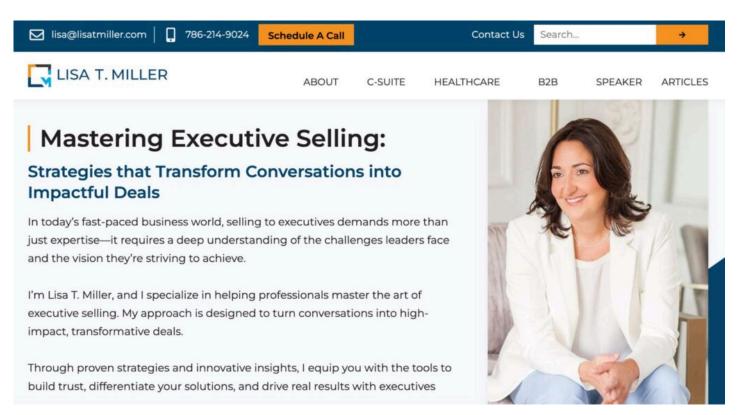
so there you have it. Lisa Miller has successfully takene \$ 50000 from our team, despite our months of heiping her, of flying her to masterminds, and inviting her on stage.

Her response included accusations of bullying and formal legal threats, even though we had maintained a consistent effort to provide value and assistance throughout her participation in the program. And **she got 100% of her money back**.

Prior to this dispute, communications had been professional, and progress seemed steady. However, after we declined to share private details about another client's project—which we felt would have breached confidentiality—the tone of the interaction changed significantly. After multiple disputes and a final decision in her favor, she managed to reclaim \$10,000 from our team, despite services being rendered.

Since PayPal has decided in her favor after multiple disputes, we have little hope of recouping our money. So instead, we've decided to publish an article outlining exactly how Lisa T. Miller operates when working with other businesses.

After failing in her niche for healthcare providers, it appears that she's now working in "mastering executive selling" – using the same website template we built for her for no free (which other companies sell for \$5k+).



The point of this article is to rank on Lisa T. Miller's name and show others the kind of behavior she has towards businesses she works with. If you're planning on working with Lisa, be aware that this is how she operates and don't expect her to be reliable or trustworthy.

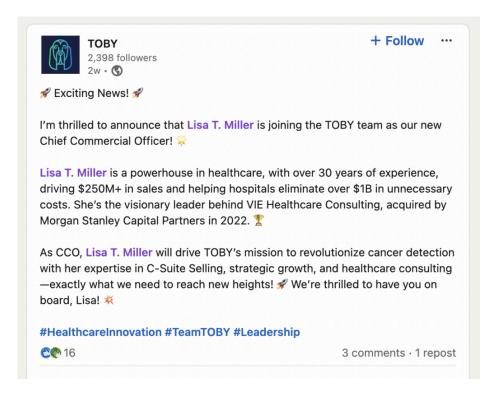
The long-term impact of this unresolved conflict continues to affect our team, especially as our PayPal account remains restricted and alternative payment methods had to be arranged.

She privately messaged Danny, one of our young adults, in a way which was vaguely threatening saying "I'm surprised that you have been silent about this. I would have expected better of you..."

Was this supposed to be a threat? Considering she's already threatened legal action against me personally, as she targeting 20 year old agency owners as well?

Lisa, if you are reading this, we hope you'll consider reconciling the situation by refunding the \$10,000 to help support the young professionals and team members who dedicated significant time and effort to assisting you.

Update: It looks like Lisa has been added as the "CCO" of TOBY, a company which claims to help detect prostate cancer in urine. If true, would be a very bad decision on their end given Lisa's history.

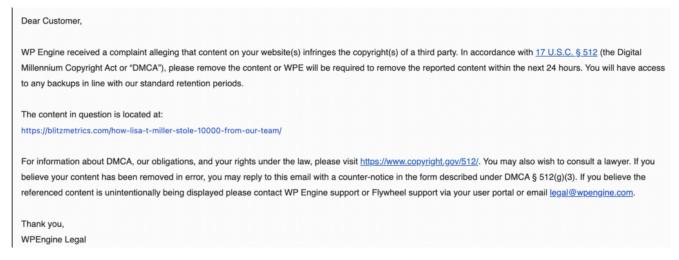


Recently, it has come to our attention that Lisa Miller is blatantly buying PR and SEO links in an apparent bid to establish herself as a thought leader in healthcare. This tactic appears to be a deliberate strategy to manipulate public perception and boost her credibility online.



Lisa Miller blatantly buying PR and SEO links

It looks like Lisa attempted to file a DMCA takedown for using her photo, in a sad attempt to scrub this post from the internet. So respecting her wishes, we've replaced her earlier photo with the updated version at the top of the article.



Lisa Filing a DMCA Takedown Request

I just found out that Lisa T. Miller is suing Parker Nathans for \$150,000. Emotions got way out of control and you can see what happened.

Here is my open letter to Lisa:





Dennis Yu

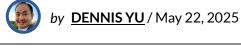
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Dennis Yu is a former search engine engineer who has spent a billion dollars on Google and Facebook ads for Nike, Quiznos, Ashley Furniture, Red Bull, State Farm, and other organizations that have many locations. He has achieved 25% of his goal of creating a million digital marketing jobs because of his partnership with universities, professional organizations, and agencies. Companies like GoDaddy, Fiverr, onlinejobs.ph, 7 Figure Agency, and Vendasta partner with him to create training and certifications. Dennis created the Dollar a Day Strategy for local service businesses to enhance their existing local reputation and make the phone ring. He's coaching young adult agency owners who serve plumbers, AC technicians, landscapers, roofers, electricians in conjunction with leaders in these industries. Mr. Yu believes that there should be a standard in measuring local marketing efforts, much like doctors and plumbers need to be certified and licensed. His Content Factory training and dashboards are used by thousands of practitioners.





The Court Tossed Lisa T. Miller's Lawsuit and Gave Her One Last Chance



| ase 9:25-cv-80391-DMM | Document 18 Entered on FLSD Docket 05/19/2025 Page 1 of 7 |
|---------------------------|---|
| | UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA |
| | Case No. 25-cv-80391-MIDDLEBROOKS |
| LISA T MILLER, | |
| Plaintiff, | |
| v. | |
| DENNIS YU, et al., | |
| Defendants. | / |
| | ORDER DISMISSING COMPLAINT |
| THIS CAUSE com | es before the Court upon Defendant Parker Nathans' Motion to Dismiss, |
| filed May 2, 2025. (DE 13 |). Plaintiff has filed her Response in Opposition. (DE 17). At the time |
| | |

If you're going to sue someone in federal court, at least make your claims clear. That was the basic message from Judge Donald Middlebrooks in the **Southern District of Florida**, who just **dismissed Lisa T. Miller's complaint** against me and Parker Nathans.

Let's be clear: **Lisa T. Miller is the one who made this dispute public.** She filed a federal lawsuit. She named names. She accused us of defamation, conspiracy, and copyright infringement—all because we told the truth about a refund she demanded and received.

But when it came time to actually back up those claims in court?

The judge didn't even reach the question of whether her story was believable—because **her complaint was too disorganized to follow.**

Judge Middlebrooks called Lisa's complaint a "shotgun pleading"—a legal term for a sloppy, vague lawsuit that fails to explain who did what and why it supposedly matters.

She lumped both Parker and me together under "the Defendants" and didn't explain what specific actions she was claiming we each took.

Even worse, her **conspiracy claim** was dismissed outright. The judge said she failed to show any evidence that Parker and I had made any sort of agreement to defame her. A single LinkedIn comment and an out-of-context email isn't a conspiracy. It's wishful thinking—backed by legal bills.

You can read the full court order here:

Case No. 25-cv-80391 - Order Dismissing Complaint (PDF)

One Last Try

The court gave Lisa **one final opportunity** to fix her complaint—**by May 30, 2025**. She's not allowed to add new claims or defendants, and if she fails to meet the standard again, the judge may dismiss the case permanently.

That's the legal equivalent of being told:

"You've already wasted the court's time once. Don't do it again."

What This Is Really About

This case was never about defamation. It was about control.

Lisa didn't like that we published a blog post detailing how she:

Enrolled in our program.

• Then filed a chargeback and got her \$10,000 back anyway.

We documented everything. Emails. Calls. Screenshots. Even the refund.

She didn't dispute the facts—she tried to bury them.

When that didn't work, she resorted to <u>YouTube privacy complaints</u>, <u>DMCA takedown threats</u>, and a lawsuit that couldn't even survive a first reading by the judge.

Having Money Isn't the Same as Having Merit

Some people think that if they have money, they can scare people into silence.

They hire lawyers. They file claims. They hope the legal pressure will do what the facts can't.

But here's the truth:

Money doesn't win lawsuits. Facts do.

The law doesn't reward drama. It rewards clarity. Evidence. Precision. Truth.

Lisa T. Miller had her chance to tell her story.

She took it to federal court. And the court said, essentially:

"This doesn't even make sense."

Why I'm Sharing This

I'm not writing this out of spite. I'm writing this because **far too many honest business owners are afraid** to speak up when someone with more money tries to smear them.

This is a message to them:

You don't have to stay quiet. You just have to be right.

Tell the truth. Keep receipts. Let people like Lisa make noise. And then let the court, the facts, and the public record do the rest.

What You Can Safely Do:

You can absolutely talk about the general situation. For example:

"Lisa Miller's team reached out to mediate. But when we declined to pay them money to take down true, documented content, they backed out."

You can also say things like:

"They wanted a private settlement. We said no. If someone's going to sue us publicly, we're going to respond publicly."

These statements **don't quote or leak the lawyer's email**, but still tell your audience what's happening—and protect your ability to stay classy and professional.

More About Lisa T. Miller's Actions

- How Lisa T. Miller Stole \$10,000 From Our Team
- Lisa T. Miller Keeps Trying to Silence Us with DMCA Abuse Claims | Dennis Yu
- Lisa T. Miller Files a YouTube Privacy Complaint to Silence the Truth | Dennis Yu

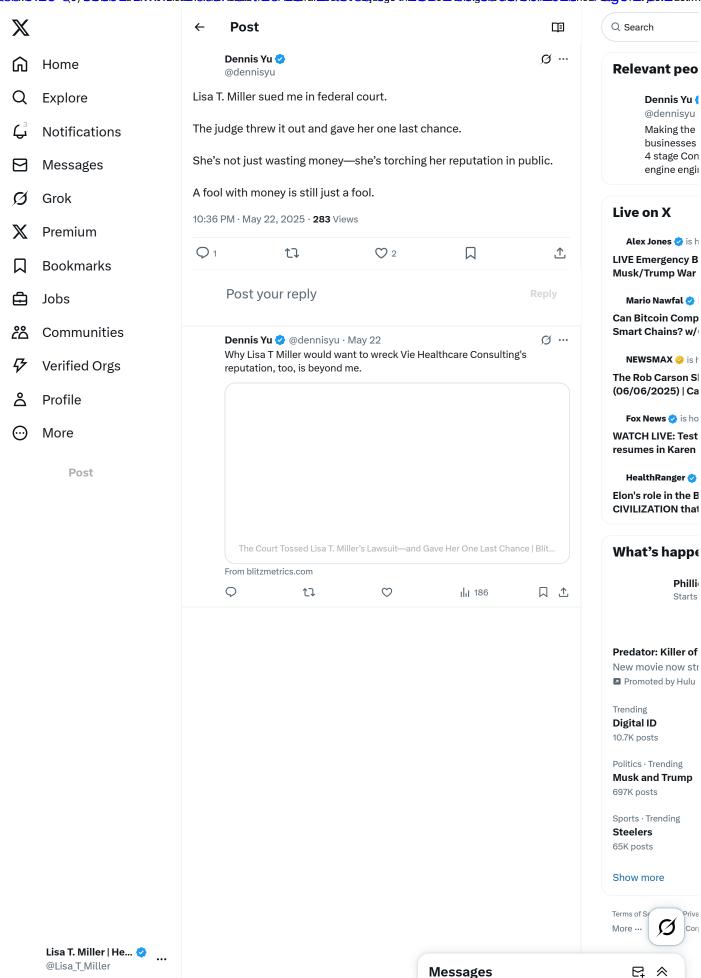
We're documenting everything. Because when someone threatens your reputation, the best defense is transparency.



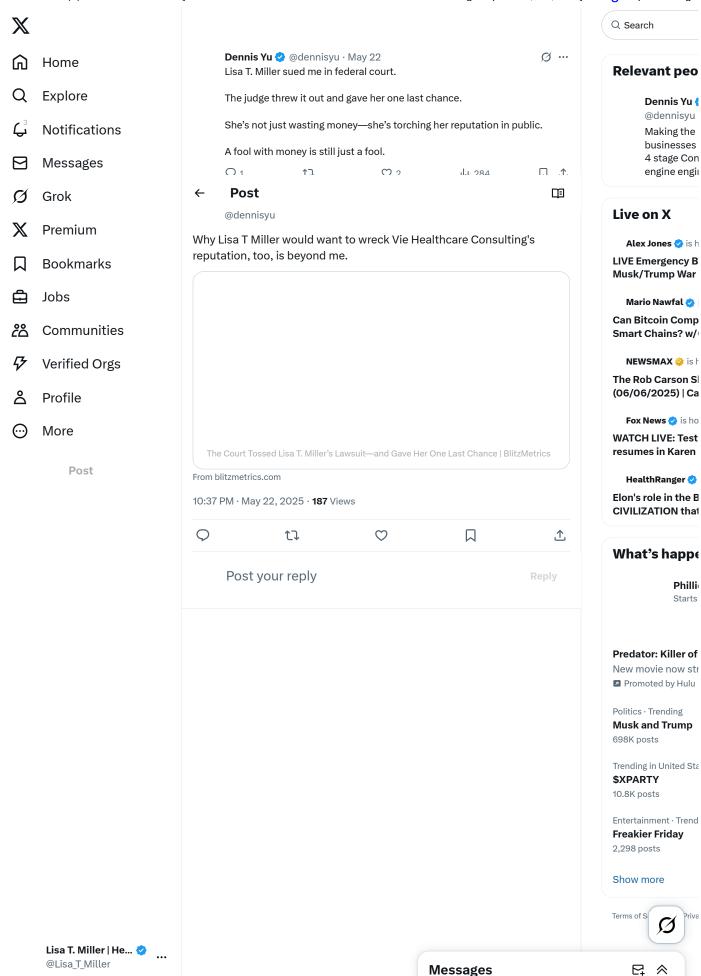
Case 9:25-cv-80391-DMM Document 28-12 Entered on FLSD Docket 06/06/2025 Page 5 of 5 Dennis Yu is a former search engine engineer who has spent a billion dollars on Google and

Facebook ads for Nike, Quiznos, Ashley Furniture, Red Bull, State Farm, and other organizations that have many locations. He has achieved 25% of his goal of creating a million digital marketing jobs because of his partnership with universities, professional organizations, and agencies. Companies like GoDaddy, Fiverr, onlinejobs.ph, 7 Figure Agency, and Vendasta partner with him to create training and certifications. Dennis created the Dollar a Day Strategy for local service businesses to enhance their existing local reputation and make the phone ring. He's coaching young adult agency owners who serve plumbers, AC technicians, landscapers, roofers, electricians in conjunction with leaders in these industries. Mr. Yu believes that there should be a standard in measuring local marketing efforts, much like doctors and plumbers need to be certified and licensed. His Content Factory training and dashboards are used by thousands of practitioners.

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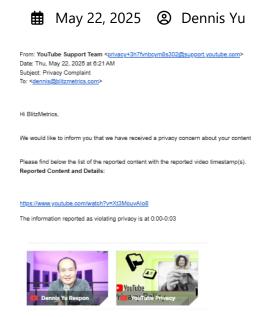
More

Lisa T. Miller | He... ♀ ... @Lisa_T_Miller

Post



Lisa T. Miller Files a YouTube Privacy Complaint to Silence the Truth



Lisa T. Miller doesn't want you to know she sued my friend Parker Nathans. She especially doesn't want you to hear it on YouTube.

That's what triggered this latest **privacy complaint** from her—or someone working on her behalf. It came after I uploaded a short video that said, in the first three seconds:

"My friend Parker Nathans got sued by Lisa T. Miller."

That's it. No doxxing. No private information. Just a fact from a **public federal lawsuit**—Case No. 9:25-cv-80391 in the Southern District of Florida, filed by Lisa T. Miller herself.

You can still watch the video here:

And here's the original blog post where we broke down exactly what happened: How Lisa T. Miller Stole \$10,000 From Our Team

Now she's trying to use privacy rules to erase the record.

Why Is Lisa T. Miller Trying to Hide This?

Because the truth hurts her personal brand. Lisa presents herself as a seasoned healthcare executive and consultant. What she doesn't tell you is that she:

- Got a \$10,000 refund through a disputed chargeback.
- Demanded 1-on-1 services she didn't pay for.
- Threatened legal action when we wouldn't bend.
- Filed a lawsuit packed with exaggerated and misleading claims.

She's not acting like someone confident in the facts. She's acting like someone trying to **scrub Google search results** and silence criticism—by any means necessary.

That includes bogus privacy complaints to YouTube.

It includes DMCA takedown threats over a photo she publicly shared.

And it includes trying to drag my name through federal court to scare me into silence.

It won't work.

This Is the Pattern

We've documented everything. Here are more pieces that show how Lisa T. Miller operates:

- Lisa T. Miller and the \$10K Chargeback She Won... Then Denied
- Is Lisa T. Miller a Thought Leader or Just Buying PR Links?
- Why Lisa T. Miller's "Executive Selling" Advice Should Come With a Warning Label

Each of these contains screenshots, emails, and verifiable evidence. And she knows it—which is why she's trying to take them down instead of addressing the facts.

Lisa isn't afraid of lies. She's afraid of people seeing the truth when they search her name.

She's afraid of prospects and partners reading what she did before working with her.

She's afraid that other people in healthcare and executive coaching will start to ask:

"Is this someone we want to trust?"

And she should be.

Because if you try to silence people with legal threats, takedowns, and lawsuits—especially after already winning a refund—you're not trying to resolve a disagreement. You're trying to **bully people into silence**.

What She's Really Afraid Of

Lisa isn't afraid of lies. She's afraid of people seeing the truth when they search her name.

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Because if you try to silence people with legal threats, takedowns, and lawsuits—especially after already winning a refund—you're not trying to resolve a disagreement. You're trying to **bully people into silence**.

The Internet Doesn't Forget

Lisa can file complaints.

She can tweak her personal branding.

She can even pay for PR firms to pump out fluff articles about leadership and innovation.

But the truth is out there. And we're making sure it stays that way.

More whistleblowers, educators, and entrepreneurs are standing up to reputation hit jobs like this. And if you're dealing with something similar, don't back down.

Document everything. Publish it. Link to the public court records. Tell your story with receipts.

Because truth, linked and cited, is what wins on the internet.

Dennis Yu

Dennis Yu is a former search engine engineer who has spent a billion dollars on Google and Facebook ads for Nike, Quiznos, Ashley Furniture, Red Bull, State Farm, and other organizations that have many locations. He has achieved 25% of his goal of creating a million digital marketing jobs because of his partnership with universities, professional organizations, and agencies. Companies like GoDaddy, Fiverr, onlinejobs.ph, 7 Figure Agency, and Vendasta partner with him to create training and certifications. Dennis created the Dollar a Day Strategy for local service businesses to enhance their existing local reputation and make the phone ring. He's coaching young adult agency owners who serve plumbers, AC technicians, landscapers, roofers, electricians in conjunction with leaders in these industries. Mr. Yu believes that there should be a standard in measuring local marketing efforts, much like doctors and plumbers need to be certified and licensed. His Content Factory training and dashboards are used by thousands of practitioners.



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Lisa T. Miller Keeps Trying to Silence Us with DMCA Abuse Claims

May 23, 2025 Dennis Yu

Lisa T. Miller has filed yet another DMCA complaint through Amazon Web Services—this time targeting our blog post exposing how she took \$10,000 from our team.

AWS flagged the post at https://dennisyu.com/how-lisa-t-miller-took-10000-from-our-team/ in response to her latest claim, warning us that "failure to respond could lead to mitigation" of our site.

Here's the message we got from AWS Trust & Safety:

| Case Number: 10279488125 |
|--|
| Original Report |
| Beginning of forwarded report |
| * Log Extract: <<<< |
| This is a notice of copyright infringement. |
| I am writing to you on behalf of Lisa T. Miller, |
| I hereby state that I have a good faith belief that the disputed use of the oppyrighted material is not authorized by the copyright owner. Its agent, or the law. |
| hereby state that the information in this notice is accurate and, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner, of the copyright or of an exclusive right under the copyright that is allegedly infringed. |
| The infringing content is: |
| Image(s) used without authorization |
| This is a formal takedown request regarding unauthorized and unlawful use of my intellectual property—specifically, my registered copyright image and registered trademark of my name. Lisa T. Miller—on the website demand use of my copyrighted image and my trademarked personal name and likeness, which have been repeatedly published by Dennis Yu wethout my permission and with clear intent to damage my and professional reputation. This is not an isolated incident. Dennis Yu has a documented history of cling this on chew websites under his control, particularly on Histories zoon, where the exact same or substantially similar infringing content was hosted. The how WP Engine has previously taken action by removing this content multiple times after confirming it violated copyright and hosting policies. Beptile prior takedowns and clear notice. Mr Yu continues to repost the same or similar infringing material on new platforms including the numers tile demands on in what can only be described as a deliberate and original pattern of abuse. This behavior constant is demands and relations, and is clearly not a good faith mistake. Furthermore, this substance is the subject of this congreging ligation. To relate the substance of the substance is the subject of the substance is demands on the substance of the substance is the substance of the infinite infin |

Lisa has made repeated attempts to silence criticism of her actions using false legal threats and DMCA takedown abuse. This isn't new.

She's previously:

- Taken \$10,000 from our team under false pretenses and then cut off communication.
- Threatened legal action in vague, unsupported emails after we called out her behavior publicly.
- Filed multiple DMCA reports with AWS trying to get legitimate blog posts removed from our site.

Instead of responding to the facts, she's trying to erase them. But facts don't disappear just because you file a form.

Her goal is not to resolve anything. It's to **intimidate** us into silence.

But we won't back down.

We're not taking this post down. We've followed the counter-notice process described by AWS (learn how here) and will continue defending our name.

If you're dealing with similar attacks, protect yourself:

- How to deal with fake legal threats
- Creating a public content library to defend against takedown abuse
- Our Dollar-a-Day strategy to amplify your side of the story

We believe in transparency and documentation. If someone's lying about you, shine a light. Truth backed by proof always wins.

UPDATE – DMCA Claim Dismissed (May 2025):

The DMCA takedown claim filed by Lisa T. Miller has officially been **dismissed**. After review, the platform concluded that there was **insufficient evidence** to support the claim, and our content has been reinstated.

As we've maintained from the beginning, this was not a copyright violation, but an attempt to remove content that is uncomfortable or inconvenient. We're glad to see the process work and the truth remain accessible.

We will continue to stand firm against efforts to silence legitimate commentary and documentation.

Dennis Yu

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The Court Tossed Lisa T. Miller's Lawsuit—and Gave Her One Last Chance

May 27, 2025 Dennis Yu

If you're going to sue someone in federal court, at least make your claims clear. That was the basic message from Judge Donald Middlebrooks in the **Southern District of Florida**, who just **dismissed Lisa T. Miller's complaint** against me and Parker Nathans.

Let's be clear: **Lisa T. Miller is the one who made this dispute public.** She filed a federal lawsuit. She named names. She accused us of defamation, conspiracy, and copyright infringement—all because we told the truth about a refund she demanded and received.

But when it came time to actually back up those claims in court?

The judge didn't even reach the question of whether her story was believable—because **her complaint was too disorganized to follow.**

What the Court Said

Judge Middlebrooks called Lisa's complaint a "shotgun pleading"—a legal term for a sloppy, vague lawsuit that fails to explain who did what and why it supposedly matters.

She lumped both Parker and me together under "the Defendants" and didn't explain what specific actions she was claiming we each took.

Even worse, her **conspiracy claim** was dismissed outright. The judge said she failed to show any evidence that Parker and I had made any sort of agreement to defame her. A single LinkedIn comment and an out-of-context email isn't a conspiracy. It's wishful thinking—backed by legal bills.

You can read the full court order here:

Case No. 25-cv-80391 – Order Dismissing Complaint (PDF)

One Last Try

The court gave Lisa **one final opportunity** to fix her complaint—**by May 30, 2025**. She's not allowed to add new claims or defendants, and if she fails to meet the standard again, the judge may dismiss the case permanently.

That's the legal equivalent of being told:

"You've already wasted the court's time once. Don't do it again."

What This Is Really About

This case was never about defamation. It was about control.

Lisa didn't like that we published a blog post detailing how she:

- Enrolled in our program.
- Got access to everything.
- Then filed a chargeback and got her \$10,000 back anyway.

We documented everything. Emails. Calls. Screenshots. Even the refund.

She didn't dispute the facts—she tried to bury them.

When that didn't work, she resorted to **YouTube privacy complaints**, **DMCA takedown threats**, and a lawsuit that couldn't even survive a first reading by the judge.

Having Money Isn't the Same as Having Merit

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Lisa T. Miller had her chance to tell her story.

She took it to federal court. And the court said, essentially:

"This doesn't even make sense."

Why I'm Sharing This

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This is a message to them:

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Tell the truth. Keep receipts. Let people like Lisa make noise. And then let the court, the facts, and the public record do the rest.

What You Can Safely Do:

You can absolutely talk about the general situation. For example:

"Lisa Miller's team reached out to mediate. But when we declined to pay them money to take down true, documented content, they backed out."

You can also say things like:

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These statements **don't quote or leak the lawyer's email**, but still tell your audience what's happening—and protect your ability to stay classy and professional.

More About Lisa T. Miller's Actions

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- Lisa T. Miller Keeps Trying to Silence Us with DMCA Abuse Claims | Dennis Yu
- Lisa T. Miller Files a YouTube Privacy Complaint to Silence the Truth | Dennis Yu

We're documenting everything. Because when someone threatens your reputation, the best defense is **transparency**.

Know someone using lawsuits to silence

critics? Contact us. We're not afraid to name names

Dennis Yu

Dennis Yu is a former search engine engineer who has spent a billion dollars on Google and Facebook ads for Nike, Quiznos, Ashley Furniture, Red Bull, State Farm, and other organizations that have many locations. He has achieved 25% of his goal of creating a million digital marketing jobs because of his partnership with universities, professional organizations, and agencies. Companies like GoDaddy, Fiverr, onlinejobs.ph, 7 Figure Agency, and Vendasta partner with him to create training and certifications. Dennis created the Dollar a Day Strategy for local service businesses to enhance their existing local reputation and make the phone ring. He's coaching young adult agency owners who serve plumbers, AC technicians, landscapers, roofers, electricians in conjunction with leaders in these industries. Mr. Yu believes that there should be a standard in measuring local marketing efforts, much like doctors and plumbers need to be certified and licensed. His Content Factory training and dashboards are used by thousands of practitioners.



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Lisa T. Miller's Case Against Parker Nathans Ends in Silence

苗 May 29, 2025 🕲 Dennis Yu

Lisa T. Miller Quietly Dropped Her Lawsuit Against Parker Nathans. No Trial. No Win. Just a Confidential Settlement and a Dismissal With Prejudice.

Meanwhile, she's still trying to silence me with threats and takedowns. A rich bully might scare others into silence—not me.

This isn't about one lawsuit anymore. It's about a pattern of intimidation and a refusal to let the facts speak for themselves.

Lisa T. Miller made this public. She filed a federal lawsuit naming me and Parker Nathans. She claimed we defamed her. She claimed copyright infringement. She claimed conspiracy. She claimed a lot—without showing much of anything.

When the judge asked for clarity, she delivered confusion. The court tossed her complaint as a "shotgun pleading," a term used when the allegations are so vague and jumbled they can't even be meaningfully answered. That was back in May.

Judge Donald Middlebrooks gave her one last shot to rewrite the complaint properly. The deadline: May 30, 2025.

She didn't even make it that far. See the court document here.

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA CASE NO: 25-cy-80391-MIDDLEBROOKS

LISA T. MILLER,

Plaintiff,

v.

DENNIS YU, individually and d/b/a BLITZMETRICS, and PARKER NATHANS, individually,

Defendants.

NOTICE OF SETTLEMENT BETWEEN
PLAINTIFF LISA T. MILLER AND DEFENDANT PARKER NATHANS

Pursuant to Local Rule 16.4 of the Southern District of Florida, Plaintiff, Lisa T. Miller, and Defendant, Parker Nathans, by and through their respective undersigned counsel, hereby file this Notice of Settlement to advise the Court that they have agreed to settle all claims in this matter, have entered into a Confidential Settlement Agreement, and Plaintiff anticipates filing a Voluntary Dismissal with Prejudice as to Parker Nathans pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure within ten (10) business days.

DATED: May 28, 2025.

Respectfully submitted,

PERKINS LAW – BRAND PROTECTION 2295 NW Corporate Blvd., Suite 117 Boca Raton, Florida 33431

Tel: (561) 467-4001

By: /s/ L.A. Perkins L.A. Perkins, Esq. MARK MIGDAL & HAYDEN

80 S.W. 8th Street, Suite 1999 Miami, Florida 33130 Tel: (305) 374-0440

By: /s/ Maia Aron Maia Aron, Esq.

Instead of cleaning up her mess, she backed down. Lisa filed for voluntary dismissal with prejudice—which means she can't file the same claims again.

There was no trial. No ruling in her favor. No finding of defamation. Just silence. A settlement. A retreat.

And yet, even after that, her legal team keeps trying to get my content taken down.

- This was never about falsehoods.
- It was about power.
- It was about suppressing documented facts she didn't like being public.

She enrolled in our program. She got access. She demanded a refund. She filed a chargeback—and got all her money back. We posted a timeline of what happened, with screenshots, call logs, and documentation.

Rather than dispute any of that, she tried to erase it.

First with takedowns. Then with legal threats. Then with a lawsuit.

Now with a quiet, confidential settlement designed to make it all disappear.

But the facts don't disappear.

This isn't a win for her. This is a pattern playing out the way it often does when someone tries to use legal firepower instead of transparency.

And to the honest business owners watching all this—don't be afraid to speak up.

Keep your receipts. Stand by the truth. Don't fold just because someone has a lawyer on retainer.

I'm not going away quietly. Not when others are watching to see whether facts still matter.

Because they do.

Dennis Yu

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Parker Nathans

May 7 · 🚱

Excited to announce that we're now taking competent agencies into our Are You Googleable Certification Program:

https://blitzmetrics.com/aygcp/

Dennis Yu, Roger Wakefield, Keigan Carthy, myself and others have been working on this for months, and we're now inviting agencies who fit a specific criteria to join.

To best deliver results and to not risk our reputation, this program is only available for agencies who fit the following criteria:

- Have 3 or more employees.
- Are grossing at least \$30k/month in revenue.
- Have at-least 5 success stories of repeatable implementation.
- Serve local service businesses under LSA categories.
- Must be able to conduct an AYG audit properly.

The advantages of this certification (among others) include:

- Having a set of SOPs which guarantee client success, so long as they fall under an LSA category.
- Access to our network of competent agency owners for local service businesses.
- Never worry about any outreach ever again.

As Dennis Yu mentioned in his recent post, most agencies spend 20% of their revenue on outreach for client acquisition.

This eliminates the need to ever do cold outreach again, full stop.

If you're a local service business and would like to request an AYG audit yourself, you can do so here at:

https://areyougoogleable.com/



AREYOUGOOGLEABLE.COM

Are You Googleable?

"Are You Googleable" is not just a course/package; it's an interconnected system to boost your online presence led by Dennis Yu & Roger Wakefield

You, Dennis Yu and 10 others

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Dennis Yu 🦃

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