

**KENDRICK MOXON** )  
3500 W. Olive Ave. Ste. 300 )  
Burbank CA 91505 )  
**(Complainant)** )  
)  
v. )  
)  
**DONALD MYERS** )  
958 Palm Avenue )  
West Hollywood, CA 90069 )  
**(Respondent)** )  
\_\_\_\_\_ )

**Domain Names In Dispute:**  
*KENDRICKMOXON.COM*

**Case Number:**  
FA1407001571591

**RESPONSE**

[1.] Respondent received a Written Notice of Complaint and Commencement of Administrative Proceeding on July 28, 2014. The Notification stated that Complainant had submitted a Complaint for decision in accordance with the Uniform Domain Name Dispute Resolution Policy, adopted by the Internet Corporation for Assigned Names and Numbers (ICANN) on August 26, 1999 and approved by ICANN on October 24, 1999 (“UDRP” or “Policy”), and the Rules for Uniform Domain Name Dispute Resolution Policy (“Rules”), effective March 1, 2010, and the National Arbitration Forum (FORUM) Supplemental Rules (“Supp. Rules”), effective July 1, 2010. Rule 4.

**[2.] RESPONDENT INFORMATION**

[a.] Name: Donald Myers  
[b.] Address: 958 Palm Avenue  
West Hollywood, CA 90069  
[c.] Telephone: (323) 464-6549  
[d.] Fax: N/A  
[e.] E-Mail: DonaldMyers@aol.com

**[3.] RESPONDENT’S AUTHORIZED REPRESENTATIVE, IF ANY**

[a.] Name: Graham E. Berry, Attorney at Law  
[b.] Address: 3384 McLaughlin Ave.  
Los Angeles, CA 90066  
[c.] Telephone: (310) 745-3771  
[e.] E-Mail: grahamberryesq@gmail.com

UDRP Rule 5(b) (ii).

Respondent's preferred contact person for correspondence relating to this case:

[a.] Contact Name: Graham E. Berry, Attorney at Law  
[b.] Contact Email: grahamberriesq@gmail.com

Rule 5(b) (iii).

The Respondent chooses to have this dispute heard before a (check one):

*single-member administrative panel*;  *three-member administrative panel*].

Rule 5(b) (iv).

#### **[4.] RESPONSE TO FACTUAL AND LEGAL ALLEGATIONS MADE IN COMPLAINT**

This Response specifically rebuts the statements and allegations contained in the Complaint and includes any and all bases for the Respondent to retain registration and use of the disputed domain name. Rule 5(b) (i).

My name is Graham Berry. I represent Donald Myers in this matter and all of his previous legal first amendment conflicts with the Church of Scientology and its members. On most occasions the church has been represented by Mr. Moxon who is part of the legal unit of its notorious Office of Special Affairs I myself have litigated against the Church of Scientology for decades, often battling with Mr. Moxon in court. I have also traveled many times to Europe to give speeches on Scientology's effect on the American criminal justice system. A link called "V for Vexatious" on the home page of the website in question documents our latest legal history.

My client has frozen the content of KENDRICKMOXON.COM until this ownership issue is quickly resolved. Although my client has documented on the website in question many events in the history of this website's ownership since 2010, that will not happen this time. There will be no public disclosure of this legal action online anywhere by my client until the ownership issue is dealt with.

I have represented Mr. Myers in Scientology related first amendment legal issues since 2008. As a participant with Anonymous his moniker is the "Angry Gay Pope" and that is how he has branded himself online. It is his service mark just as "Kendrick Moxon" is the complainant's claimed service mark. My client will hereafter be referred to as the "Respondent," the "Angry Gay Pope," "AGP" or simply "the Pope". The Church of Scientology will be referred to as "the Church" and "COS."

#### **[a.] PROMINENT DISCLAIMER ON WEBSITE**

Despite the Complainant stating that "*Confusing similarity is self-manifest. The Disputed Domain wholly incorporates the common law Mark, and is therefore identical thereto. The Disputed Domain contains no textual elements that would distinguish it from the Complainant*" there is a prominent textual disclaimer on the home page as shown in ANNEX A. Indeed, the Disputed Domain actually

states “DISCLAIMER: This website is neither run by, nor associated with, infamous Scientology lawyer Kendrick Lichty Moxon. The opinions expressed are not necessarily those of notorious cult lawyer Kendrick Lichty Moxon.” The text was designed to be very visible yet Mr. Moxon ignored it in his complaint. Mr. Moxon has lied already. This is a common Scientology tactic, especially in the courtroom. He sees what he wants to see.

The home page of the website in question features a large photo of Mr. Moxon in a circle. It is not a target, a crosshairs, a bloody red X ... it is just a large circle with a human face in it placed to get the viewer’s attention so they will notice the disclaimer. My client, a Disney animator, believes human faces draw the viewer’s eyes the best.

Mr. Moxon also has no home page of his own for the Respondent to mimic. The Respondent MUST use Moxon’s common law mark because there is no way to refer to him without using his real name. Meanwhile the Angry Gay Pope is part of Anonymous.

**[b.] COMPLAINANT HAS NO FUNCTIONING WEBSITE OF HIS OWN**

Despite being something of a celebrity in Church of Scientology historical and social circles (and in the eyes of protesters) Mr. Moxon keeps a low profile. He is not a prominent Los Angeles attorney. Although he lists his email address as kmoxon@kmoxonlaw.com in this complaint there is no functional “[KMOXONLAW.COM](http://KMOXONLAW.COM).” As shown in ANNEX B of the response his website is a blank white page. There is not even a “coming soon” graphic or a 404 error text. He has no business web page, no personal home page, no Facebook or other social media page. There are no websites which visitors could confuse with his own. That is why it was so easy for the Angry Gay Pope to buy the domain name in the first place. If there ever were a deterrent to finding work today not having a presence on the web would be it. But this does not seem to bother Mr. Moxon. He has had years to build a competitive website but he has not. According to the WHOIS record in Complainant’s ANNEX B he only registered this unused domain on December 31, 2013, several years after my client created his fully functioning website.

If a legitimate business home page for Mr. Moxon actually existed a link would have been placed on KENDRICKMOXON.COM allowing the visitor to go there and read the Complainant’s side of events. Let visitors judge for themselves. But he has decided to stay hidden. This creates more curiosity in the public about Rick. Curiosity that demands a website. So little is seen of him or his family that, when his wife appeared on a [Toastmasters YouTube video](#), this news was quickly shared among protesters and the video was placed on KENDRICKMOXON.COM.

The existence of KMOXONLAW.COM proves that the respondent has not prevented the Complainant from reflecting his service mark in a corresponding domain name.

The Angry Gay Pope’s website home page (index.html) he personally wrote for KENDRICKMXON.COM has almost 400 lines of code, uses cascading style sheets and includes unique photos taken by the Respondent. As a Disney animator he has included multiple 3D rendered images and a Flash animation of a 3d Scientology “double cross” morphing from pristine to rust encrusted.

By contrast, the brief source code of lawyer Kendrick Moxon’s own “website” the Pope was accused of copying is as follows:

```
<!DOCTYPE html PUBLIC "-//W3C//DTD XHTML 1.0 Transitional//EN"
    "http://www.w3.org/TR/xhtml1/DTD/xhtml1-transitional.dtd">
<html xmlns="http://www.w3.org/1999/xhtml" >
<head id="ctl00_Head1"><title>
    kmoxonlaw.com
</title>
<style type="text/css">body{margin:0;padding:0;}img{border-style:none;}#container
    {background-color:#FFF;}</style>
</head>
<body>
<div></div>
    <script type="text/javascript" src="http://ak2.imgaft.com/script/jquery-
        1.3.1.min.js"></script>
    <img id="imppspacer" alt="" height="1" width="1" />
    <script type="text/javascript" language="javascript">
        var imppspacer = document.getElementById('imppspacer');
        if (imppspacer) { imppspacer.src =
            '/img.aspx?q=L3MkWGAKAmDmAmD4BGLIAGD3AQN0AQxlBPHIAz
            pyZ3RmAwtyZwMyWGAKWGV2ovHmpGNyZwMwWGAKZPHIAzIzWG
            AkZPHIAzLyZ3RyZwMyMIHmpGVjZGDjBQN4ZGxlBQR0WGV2L3xy
            Z3RkWGv2qTpyZ3RyZwM4WGAKWGV2MzqjWGAKZPHIAz56WGAKZ
            PHIAzMjWGAKZmVkwGV2nT5aWGAKZFHIAaOjWGAKyF0yZwMwn
            PHmpGN=-1'; }
    </script>
<!-- pageok -->
<!-- 02 -->
<!-- 368 -->
<!-- 7.12-->
<!-- Copyright -->
</body>
</html>
```

[c.] **MOXON’S CHURCH SPONSORS NASTY HATE PAGES AGAINST THE RESPONDENT AND ENTIRE HATE WEBSITES AGAINST MANY OTHERS**

The Complainant believes that “*The Respondent’s conduct evidences a malicious, vindictive and purposeful campaign intended to embarrass, discredit, and defame the Complainant and to vitiate, dishonor, and impair the reputation and goodwill of the KENDRICK MOXON service mark.*”

My client feels that his website hosts mostly a collection of unchanging photo galleries and brief textual updates regarding what the Church and Mr. Moxon are

up to. It is not the fault of the Angry Gay Pope that Carla Moxon is a member of Toastmasters and [they post videos on YouTube](#). The complainant is referred to by the Pope as “infamous,” “notorious,” and “cultist” but Mr. Moxon errs again when he claims “*Information on the Website is, in fact, highly libelous, from allegations that Mr. Moxon is “America’s worst attorney” to allegations that he is a murderer.*” A quick look at the complainant’s own ANNEX H shows that my client writes “America’s worst attorney?” ending in a question mark thus leaving it up to the reader to decide. And the Pope’s website claims that he attempted to enforce Scientology’s well known Sea Org pro-abortion policy on his unborn granddaughter, a Sea Org member. That is hardly murder.

Compare my client’s KENDRICKMOXON.COM pages in ANNEX C with the childish websites in ANNEX E. These are the Church of Scientology’s own hate pages against its critics and, especially, against its former members who fight the Church after leaving (aka apostates). Several hate pages featuring my client call him a “conman,” “Myers, a proud stalker,” “I’m an alcoholic, I’m a pothead, I’m a crystal meth addict, I taken (sic) donation without so much as a “thank you” email ... I suck in donations and spend them on booze, pot, crystal meth and more! I can’t wait to be arrested so I can get ‘prison buttseks.’”

Despite this online negativity my client has never tried to have these hate pages taken down. In fact he finds them highly amusing and wishes there were more of them. But the Church knows that my client will use any attention they give him to his own advantage. Therefore hate pages against him are much rarer than hate pages attacking actual ex-Scientists. Those are much more common. There are at least 38 often redundant hate sites listed on a hate page for whistle blower [Marty Rathbun](#) alone.

As a long time critic of COS the Church even includes myself, Graham Berry, in their hate pages. I am referred to on a hate site in ANNEX E as “an unemployed attorney. He stated under oath, in a court of law, that his psychiatric problems, alcohol dependency and treatment prevent him from practicing law.” And much worse has been said about me in court where such statements actually matter.

But the most hideous hate pages are not reserved for Anonymous protesters or long time critics. Ex-VIP members like [Marty Rathbun](#), [Karen De La Carriere](#) and many others have been victimized by multiple hate pages and domains. They are impersonated on message boards. Their homes are visited by camera toting goons and the videos uploaded for public consumption. The Church’s pages go so far in mimicking other people’s sites that it is very hard to tell the real Marty Rathbun protest site from [the fake Anti-Marty Rathbun site COS created](#). That website was an attempt to “Google bomb” Church whistle-blower Marty Rathbun and associate his name in net searches with the word “sociopath.”

**[d.] RESPONDENT IS MAKING A LEGITIMATE NON-COMMERCIAL AND FAIR USE**

Respondent is making a legitimate noncommercial and fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to

tarnish the trademark or service mark at issue. When KENDRICKMOXON.COM was first written it contained a PayPal link through which the Angry Gay Pope took donations. When Church legal representative Ava Paquette complained of this tactic, as shown in ANNEX C, the donation link was immediately removed. Since that time in 2010 my client has made no commercial gain from this website. It actually costs him time and money for hosting, domain name ownership, domain name defense, content creation, research and editing.

But my client selflessly feels that the effort and expense is worth it in order to educate the public about Kendrick's actions and the actions of his Church. AGP offers no goods or services. The website is free. Therefore he could not make commercial gain or misleadingly divert consumers. He is not advertising the website or attempting to divert visitors from Kendrick Moxon's blank web page. Mr. Moxon, likewise, has made no attempts to develop or promote or drive traffic to his website KMOXONLAW.COM. Until my client received the complaint which featured Mr. Moxon's email "knoxon@knoxonlaw.com" the Pope had no idea Mr. Moxon even had a website.

**[e.] LATENESS OF COMPLAINT**

This complaint has been filed very late. Almost four and a half years late. The complainant's ANNEX A contains the creation date of the WHOIS record: *April 14, 2010*. Shortly after that the pages were posted for public consumption. If the existence of KENDRICKMOXON.COM was such a burden to the complainant then why did he wait over four years to take more action? Especially if, as alleged, *"The Respondent's unlawful conduct has and will damage the Complainant through the loss of customers, profits, business, and good will."*

As indicated above, Mr. Moxon works primarily from the Church of Scientology Office of Special Affairs located at 6331 Hollywood Boulevard, Los Angeles. The Office of Special Affairs has an entire team of staff monitoring the Internet 24/7 for any reference to the Church or its associates such as Mr. Moxon. He would have known very quickly, and certainly the same day, my client's website KENDRICKMOXON.COM was unveiled.

At the time of the website's debut on April 14, 2010 one of the Complainant's legal colleagues in Scientology's Office of Special Affairs was [Ava Paquette](#). This attorney sent out so many letters and emails threatening court action against websites criticizing COS that a term called the "Avagram" was coined. According to [UrbanDictionary.com](#) an Avagram is a "nasty lawyer letter from Scientology lawyer Ava Paquette." Few barristers manage to generate their own defining Internet meme and yet a Google search of "Avagram" brings up 23,000 results. See APPENDIX H.

If KENDRICKMOXON.COM's ownership was so toxic that it was handled by someone so openly litigious then why didn't Mrs. Paquette take further action in 2010?

However, all she did was contact my client and demand changes. Some of those changes she requested on behalf of the Complainant were made as shown in Respondent's ANNEX C. No further threats against the website were received. This puzzled my client as he expected the Church of Scientology, famous for its instantaneous aggressiveness in all arenas, to more vigorously fight the existence of the website at the time of its inception. The Complainant (an attorney) and his attorney's subsequent inaction and implied acquiescence estops him from any relief now even if he had made a persuasive case which it is submitted he has not.

KENDRICKMOXON.COM is registered to the Angry Gay Pope until the year of our Lord *Anno Domini* 2018 .

**[f.] WEBSITE POSES NO JEOPARDY TO COMPLAINANT'S CAREER**

This website was not designed to prevent the Complainant from conducting his business. It was designed to facilitate the Angry Gay Pope's first amendment rights as against Mr. Moxon's work on behalf of the church to squelch the first amendment rights of those critical of the church and certain of its policies and practices, and those of its agent such as the Complainant, against critics such as the Angry Gay Pope. Indeed, there is little chance that "*Respondent's [alleged] unlawful conduct has and will damage the Complainant through the loss of customers, profits, business, and good will – as well as by damage to the Complainant's reputation and diluting the Mark itself.*" Mr. Moxon is one of the Church's longest serving internal lawyers, having been with the group since the 1970's and a participant in the church's "Operation Snow White." It was the largest known criminal infiltration of the U.S. government. Significantly, the Complainant was named as an unindicted co-conspirator in the resulting criminal prosecution which resulted in eleven leading church executives going to federal prison (U.S. v. Mary Sue Hubbard). This is revealed in Moxon's own ANNEX G, the Wikipedia article about him.

The Complainant states that "*The Complainant Kendrick Moxon is a prominent attorney in Los Angeles.*" That is an obvious boast because Moxon is not a prominent attorney. He lives within the bubble of the Church and represents it almost exclusively. He is their in-house "attack dog." Mr. Moxon is the Church's main legal aggressor and has a long history of vexatious litigation which has made him many enemies. These and others, such as the media, appear to find KENDRICKMOXON.COM informative.

Mr. Moxon has achieved lifetime employment with the Church and, though he may occasionally represent others (as alleged in Complainant's ANNEX J), his career with COS is steadfast. As he admitted in his own complaint, the net has "*numerous articles, blog posts, Wikipedia entries, and Internet gripe sites dedicated not just to stigmatizing Mr. Moxon as an archetype of Scientology-related aggression, but to the personal ruin of Mr. Moxon and his law practice.*" This profusion of Internet hate has not stopped him from practicing law for the Church. The Internet is mostly irrelevant or censored within the Church. Perhaps in the outside world this bad publicity would hinder him if seeking a job with a secular law firm or government agency. COS has a toxic reputation in the legal

arena and there is a host of adverse media regarding Mr. Moxon's past actions – especially against those exercising their first amendment rights against the church and its agents. Accordingly, KENDRICKMOXON.COM is just a symptom of, not a cause, of his infamy. As my client would say, Anonymous does not forget.

**[g.] MONETARY COMPENSATION NOT DEMANDED YET  
COMPLAINANT CLAIMS WEBSITE A DETRIMENT TO HIS INCOME  
SINCE 2010**

Although Mr. Moxon complains that the existence of the website in question has caused a “*the loss of customers, profits, business*” he makes no demands for monetary compensation for losses incurred. That is because there were no losses.

**[h.] PHOTOS AND VIDEOS TAKEN IN PUBLIC**

The photos and videos of Mr. Moxon linked to on the Pope's website were all taken on public streets. One of the photos taken by my client is even used on Moxon's own Wikipedia entry, as shown in ANNEX G of his own evidence and ANNEX F of my client's. AGP has taken many of the few photos and videos of the Complainant and [Ava Paquette](#) which exist. He cannot escape the work of the Pope even on Wikipedia.

**[i.] ENTIRE WEBSITE A GLORIFIED “LINKS” PAGE**

As shown in ANNEX D, WEBSITE STATISTICS, the home page of the site in question contains twenty-eight links to other websites, such as Wikipedia, and only four internal links. There is so much negative material about Mr. Moxon on the web that it was not necessary for the Respondent to include them in his own domain. Total internal links are 150, external links 97, a ratio of 1.5/1. It is almost impossible for the Respondent to reduce Mr. Moxon's good will on the Internet via a website because Mr. Moxon has gained no good will there in the first place. Even if KENDRICKMOXON.COM were deleted all the sites the Pope's pages link to would still exist.

**[j.] RESPONDENT'S LEGAL ISSUES WITH THE CHURCH IRRELEVANT  
TO THE DISCUSSION OF KENDRICKMOXON.COM**

As a participant with the worldwide Internet activist group Anonymous, my client has had multiple legal incidents with the notoriously litigious Church of Scientology. However, these are completely irrelevant to this discussion as none of them involve KENDRICKMOXON.COM. Even Mr. Moxon himself is involved in the cases only tangentially as the legal representative for the Church. Nevertheless, in true Scientology style Mr. Moxon has used 17 pages of Annexes (C through E) attempting to smear my client via legal records. Mr. Moxon does not even begin to discuss the website in question until his Annex H, preferring instead to smear my client for many pages first. The shirtless photos of him talking to Scientology worker Lissa Uvizl were taken during a completely innocent incident the Church used as an excuse to get a restraining order against the Pope. The entire harmless 2008 incident is available for viewing [here](#). A picture of him shirtless on the last page of the Complainant's ANNEX D shows my client at a later time standing hundreds of miles away from the previous photos and is not interacting with anyone.



My client considers his actions either lawful or legitimate civil disobedience such as [shouting outside a Scientology school](#) to publicize the Delphi Academy's dangers, or [stepping on the Church's pansy flowers](#) to force the police to show up and protect protesters.

Nonetheless, none of those events occur on KENDRICKMOXON.COM because the web page is about Moxon, not my client. My client's legal issues are therefore irrelevant here.

**[k.] ANGRY GAY POPE A LEGITIMATE INVESTIGATIVE JOURNALIST**

The Angry Gay Pope's absurd name, masked face and rainbow shirt wearing appearance at street protests is not a coincidence. The contrast between how he looks and what he says or does is deliberate. The Church attempts to get the local police to arrest protesters. Anonymous members are portrayed as terrorists. If the police feel pressured to arrest someone for "terrorism" it will be extra-humiliating for them to do it while the suspect is dressed like a clown and surrounded by friends with camera phones. Despite the name and appearance my client has taken photographs of the Church of Scientology which no one else has. His work appears on Wikipedia, in documentaries broadcast in Germany, France, Australia and more. Concurrently with his incarceration the [British DailyMail.com](#) posted an article quoting him and re-posting photos my client took of the Church compound at Twin Peaks, San Bernardino CA in 2010.

My client is not the abusive scofflaw Moxon portrays him as. Previous to protesting the Church in early 2008, and being stalked by Mr. Moxon and his henchmen (who include off-duty police officers and former FBI agents), the Angry Gay Pope had had no legal encounters. He was a Disney animator and, in 2010, became an Emmy award winner working for Steven Spielberg and Tom Hanks on HBO's "The Pacific," a project highlighting our nation's veterans. Had his job not been outsourced he would still be doing that instead of devoting his time to investigating the Church of Scientology. But, because he has time on his hands, he devotes himself to this charity work.

**[l.] MY CLIENT HAS NO INTEREST IN SELLING KENDRICKMOXON.COM**

As Mr. Moxon correctly documents in his ANNEX F, on December 30, 2012 he suddenly made a \$3000 offer for the website and wanted to purchase it "before the year ends" aka the next day. My client found this timing suspicious and the amount too low even when Mr. Moxon raised it to \$3,400. My client knows that the Church of Scientology has many tax breaks and a lot of money while the Pope himself must pay taxes and is often a "starving artist" working in film. He felt he could not look himself in the mirror and say he had sold out to the Church (as so many others have) for a paltry sum. That \$3,400 doesn't even cover the many weeks he spent writing the website, taking photos and videos, generating artwork and animations and documenting his subject. Mr. Moxon made that offer nearly two years ago. He has clearly sat on and waived whatever rights and remedies he claims to have, and which are contested.

**[m.] SCIENTOLOGY IS MR. MOXON'S RELIGION AND HE SHOULD NOT HAVE TO RESORT TO "WOG" LAW**

In June 2014 (as seen in Respondents ANNEX C) KENDRICKMOXON.COM reported that the Complainant had achieved one of the highest levels of Scientology study, Operating Thetan level seven (OT7). Non-Scientologists are called "wogs" just as Jews refer to non-Jews a "gentiles."

The IRS determined the Church of Scientology to qualify for section 501 (c) (3) tax exempt status. .

The following paragraphs are written using Scientology jargon as it would be remiss not to discuss KENDRICKMOXON.COM within the viewpoint of Scientology itself.

*It's understandable that Mr. Moxon has felt enturbulated by the white PR on this website. Rick is an Operating Thetan Level 7; one of the highest levels of Scientology public achievement. However, as stated on the site, "Kendrick Moxon is not at cause over this website."*

*At his level of achievement LRH's teaching should have given Rick more control over the whole track. It has been over four years. By now he should have gone back on the time track and prevented AGP from buying the website in the first place. End of comm line.*

*Obviously unable to do this, he should repeat those courses over again at full charge.*

**[n.] CONCLUSION**

I hope that the member of the administrative panel responsible for reviewing this complaint finds it an interesting, even entertaining diversion from their usual cases. I hope you discuss it with your colleagues.

This is a simple case of a participant in *Anonymous vs. Scientology*. Regardless of which side you favor now both sides will probably be back before you again ... soon.

Notwithstanding, the pending Complaint is a transparent attempt to suppress the Angry Gay Pope's freedom of speech. It is nothing more and should be rejected as such.

**[5.] RESPONSE TRANSMISSION**

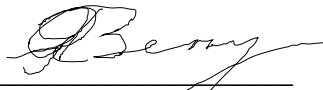
The Respondent asserts that a copy of the Response, as prescribed by FORUM's Supplemental Rules, has been sent or transmitted to the Complainant, in accordance with Rule 2(b). Rule 5(b) (vii); FORUM Supp. Rule 5.

[6.] The Respondent respectfully requests that the Administrative Panel denies the remedy requested by the Complainant.

**[6.] CERTIFICATION**

Respondent certifies that the information contained in this Response is to the best of Respondent's knowledge complete and accurate, that this Response is not being presented for any improper purpose, such as to harass. And the assertions in this Response are warranted under these Rules and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument.

Respectfully Submitted,  
DONALD MYERS  
aka the "ANGRY GAY POPE"  
by his attorney



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Dated: August 16, 2014

# SCHEDULE OF ANNEXES

ICANN Rule 3(b) (xv)

- A. KendrickMoxon.com's prominent disclaimer
- B. KMoxonLaw.com
  - Actual website
  - Whois database entry
- C. Selected KendrickMoxon.com pages
  - Home page
  - Avagram
  - Moxon's response
  - V for Vexatious legal record
- D. Website statistics
  - Outbound home page links
  - Total inbound vs. outbound links
- E. The Church of Scientology's own hate pages
  - Anti-Angry Gay Pope pages
  - Anti-Graham Berry page
  - Anti-Marty Rathbun websites
- F. Angry Gay Pope in the media
  - Wikipedia media
  - Emmy Award
  - Internet Movie Database entry
- G. Moxon's alleged affair not included in KendrickMoxon.com as respondent considered it an unprofessional smear
- H. The "Avagram"