

KENDRICK MOXON
3500 W. Olive Avenue, Suite 300
Burbank, CA 91505

(Complainant),

vs.

DONALD MYERS
958 Palm Avenue
West Hollywood, CA 90069

(Respondent).

COMPLAINT

Domain Name In Dispute:

KENDRICKMOXON.COM

**COMPLAINT IN ACCORDANCE WITH
THE UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY**

1. This Complaint is hereby submitted 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 (ICANN Policy), and the Rules for Uniform Domain Name Dispute Resolution Policy (ICANN Rules), adopted by ICANN on August 26, 1999, approved by ICANN on October 24, 1999, updated on March 1, 2010, and the National Arbitration Forum (NAF) Supplemental Rules (Supp. Rules). ICANN Rule 3(b)(i).

2. **COMPLAINANT INFORMATION**

- a. Name: Kendrick Moxon
- b. Address: 3500 W. Olive Avenue, Suite 300
Burbank, CA 91505
- c. Telephone: (818) 827-7104
- d. Fax: N/A
- e. E-Mail: knoxon@knoxonlaw.com

COMPLAINANT'S AUTHORIZED REPRESENTATIVE

- f. Name: Steven L. Rinehart, Esq.
- g. Address: 136 E. South Temple, Suite 2400
Salt Lake City, UT 84111
- h. Telephone: (801) 347-5173
- i. Fax: (801) 665-1292
- j. E-Mail: steve@uspatentlaw.us

The Complainant's preferred method for communications directed to the Complainant in the administrative proceeding: ICANN Rule 3(b)(iii).

Electronic-Only Material

- a. Method: E-mail
- b. Address: steve@uspatentlaw.us
- c. Contact: Steven L. Rinehart

Material Including Hard Copy

- a. Method: Fax
- b. Fax: (801) 665-1292
- c. Contact: Steven L. Rinehart

The Complainant chooses to have this dispute heard before a single-member administrative panel. ICANN Rule 3(b)(iv).

3. **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: donaldmyer@aol.com

4. **DISPUTED DOMAIN NAMES**

- a. The following domain names are the subject of this Complaint: ICANN Rule 3(b)(vi).

KENDRICKMOXON.COM

- b. Registrar Information: ICANN Rule 3(b)(vii).

- 1. Registrar's Name: NameSecure, LLC
- 2. Registrar's Address: 10 Azalea Drive
Drums, PA 18222
- 3. Telephone Number: (571) 434-4651
- 4. Facsimile: N/A
- 5. E-Mail Address: support@namesecure.com

- c. Trademark/Service Mark Information: ICANN Rule 3(b)(viii).

Common-law rights in the service mark:

KENDRICK MOXON

5. **FACTUAL GROUNDS**

This Complaint is based on the following factual and legal grounds: ICANN Rule 3(b)(ix).

a. Jurisdictional Basis for the Administrative Proceeding

1. This dispute is properly within the scope of the Uniform Domain Name Dispute Resolution Policy (UDRP) and the National Arbitration Forum's (NAF) Administrative Panel has jurisdiction to decide the dispute. The Registration Agreement, pursuant to which the domain that is subject of this Complaint is registered, incorporates the UDRP. A true and correct copy of the domain name dispute policy that applies to the domain name in question is provided as **Annex A** to this Complaint.

b. The Complainant's Background

1. The Complainant Kendrick Moxon is a prominent attorney in Los Angeles, California. Mr. Moxon entered the legal community after obtaining his juris doctorate from George Mason University in 1981. He was admitted to the Washington, D.C. bar in 1984 and the State Bar of California in 1987. His bar membership profiles are collectively shown in **Annex B** hereto.

2. Since entering the practice of law three decades ago, Mr. Moxon has represented the Church of Scientology and its individual members in over 150 legal proceedings. These legal proceedings include class action lawsuits filed against churches of Scientology and its principals, lawsuits involving the IRS and other government agencies, and lawsuits against various organizations seeking to harm Scientology and its members.

3. Mr. Moxon has also represented members of other religions, including a Pentecostal man in a federal civil rights action who was kidnapped by "deprogrammers" and imprisoned in an effort to forcibly change his faith. He has also represented plaintiffs in various human rights and civil rights cases. Further, he has represented parties respecting prosecution for criminal acts against his clients, including acts by members of the so-called "Anonymous", of which the Respondent is an active participant. Such representations were undertaken using the common law service mark KENDRICK MOXON (the "Mark").

4. Mr. Moxon has appeared on *Sixty Minutes* and been featured by other media outlets in the course of his career, which media outlets have all recognized him by his common law Mark. Many of the matters which Mr. Moxon has litigated have resulted in favorable outcomes for Mr. Moxon's clients before numerous US districts courts, federal bankruptcy courts, federal appellate courts, state courts, and various other authorities. With many of these successes, vindictive feelings of personal animosity of the part of Scientology's detractors and the Respondent toward Mr. Moxon have grown, culminating today in 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.

5. In 2008, Mr. Moxon represented a young woman who was stalked by the Respondent to this action, Mr. Myers, and acquired an injunction against him to protect the woman's safety. A copy of the injunction is annexed hereto as **Annex C**. Several photographs from the trial of that matter, some showing the Respondent stalking or harassing Mr. Moxon's client in that action, Lissa Uvizl, are appended hereto as **Annex D**. Mr. Moxon was also instrumental in representing an elementary school in Santa Monica, California (Delphi Academy) which was also the subject of abuse and threats by the Respondent Myers, resulting in a criminal restraining order against the Respondent. A copy of the police report, conclusory letter from the prosecutor to the Delphi Academy, and the criminal injunction against Myers are collectively annexed hereto as **Annex E**. It was following these representations and convictions against Mr. Myers, that the Respondent Myers usurped the name "Kendrick Moxon," by registering the domain dispute at issue.

6. Prior to filing this action, Mr. Moxon attempted reasoning with the Respondent, and negotiated with him, to no avail. The Respondent Myers demanded \$10,000 to return the domain underlying this action, <kendrickmoxon.com> (the "Disputed Domain"). A copy of the correspondence between Mr. Moxon and Respondent's counsel demanding \$10,000 is annexed hereto as **Annex F**.

7. Many sites and publications evidence the stature and notoriety over the last thirty years in the mind of the public which the Complainant has accrued in his common law service mark KENDRICK MOXON. Evidence of this notoriety on the part of others includes inter alia:

- (a) The Wikipedia article, extensively maintained, incorporating his Mark annexed hereto as **Annex G**, found online at http://en.wikipedia.org/wiki/Kendrick_Moxon;
- (b) The website at the domain underlying this dispute, screenshots of which are annexed hereto as **Annex H**, found online at <http://www.kendrickmoxon.com/>;
- (c) Hundreds of videos filmed by third-parties of Mr. Moxon and maintained online, some of which are annexed hereto as **Annex I**, including videos of Mr. Moxon defending his client on *Sixty Minutes*, attending protests against his clients, and performing other attorney-related functions;
- (d) Various sample pleadings, motions and memoranda existing in the public domain and bearing Mr. Moxon's common law mark KENDRICK MOXON collectively annexed hereto as **Annex J**, which comprise only a sample of hundreds of public filing bearing the Mark existing in the public domain;
- (e) Videos hosted by third-parties on YouTube optimized to create initial interest confusion with the Mark, including that at <http://youtu.be/PZUiT9wmPX0>;
- (f) Countless Wordpress blogs and websites dedicated to analyzing and mischaracterizing the Complainant's legal victories, summarized in Google searches as evidenced by **Annex K** hereto.

8. The association in the mind of the public between the Complainant and the KENDRICK MOXON Mark is extensive.

c. The Respondent's Bad Faith Registration and Use of the Disputed Domain

1. The Respondent registered the Disputed Domain <kendrickmoxon.com> for the bad faith purpose of using initial interest confusion created by the Disputed Domain to libel the Complainant. The Respondent's registration of the Disputed Domain is attested by the WHOIS record annexed hereto as Annex L.

2. The Respondent has constructed and published a website resolved to by the Disputed Domain that contains false and misleading information antithetical to, and calculated to interfere with, the Complainant's economic relationships (the "Website"). The Website contains misstatements of fact concerning the Complainant and baseless allegations and disparaging characterizations of the Complainant. 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. These allegations are calculated to interfere with Mr. Moxon's law practice by directing Internet traffic to the allegations using only a domain which wholly incorporates, and is identical to, Mr. Moxon's common law service mark.

3. The Complainant has annexed screenshots of the Respondent's Website hereto as Annex M. These screenshots show that the Respondent's use of the Disputed Domain is calculated to interfere with the Complainant's business affairs and drive traffic intended for the Complainant to the Respondent's site.

4. 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. In short, the Respondent's use of the Disputed Domain is in bad faith. 6 The bad-faith purposes for which the Respondent registered and is using the Disputed Domain include, inter alia, confusing the Complainant's clients, diverting traffic intended for the Complainant, disrupting the Complainant's business, harming the Complainant's client(s), and/or depriving the Complainant of use of its service mark in the Disputed Domain online.

5. The Respondent registered the Disputed Domain with knowledge of the Complainant's notoriety and common law rights in the Disputed Domain. It was the very fact that the Respondent knew Internet users would be searching for the service mark KENDRICK MOXON that motivated the Respondent to register the Disputed Domain. The Respondent's action itself is evidence of the secondary meaning and common law rights ascribed to the Mark, as the Respondent's actions manifest a recognition of value and repute of the Complainant's Mark. *Minnesota Mining and Manufacturing Company v. Mark Overboy*, WIPO Case No. D2001-0727, held that:

The Respondent's registration of the domain names has been made with the purpose of preventing the Complainant from reflecting the mark in corresponding domain names [emphasis added]– in order to force [complainant] into transfer-for-price negotiations.

6. The Respondent's 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. The Complainant has suffered further damage through expenditures associated with bringing this action.

d. The Complainant's Common Law Mark

1. The Complainant has been using the mark KENDRICK MOXON in commerce since 1984 when the Complainant first began doing business as an attorney. The Complainant has common law rights in the KENDRICK MOXON expression. *See Hiatt v. Pers. Fan & Official Site Builders: we build great sites*, FA 881460 (Nat. Arb. Forum Feb. 21, 2007) (“Registration with a trademark authority is unnecessary under Policy ¶ 4(a)(i) in instances where a mark has gained secondary meaning through extensive commercial use and common law rights have been established”; *see also Artistic Pursuit LLC v. calcuttawebdevelopers.com*, FA 894477 (Nat. Arb. Forum Mar. 8, 2007) (finding that Policy ¶ 4(a)(i) does not require a trademark registration if a complainant can establish common law rights in its mark).

2. Numerous cases have recognized that a complainant may accrue common law trademark rights through use of their own name in commerce. *See Bayless v. Cayman Trademark Trust*, FA 648245 (Nat. Arb. Forum Apr. 3, 2006) (“The Panel concludes Complainant has proved that the RICK BAYLESS mark has become sufficiently connected to Complainant's career as a chef and the public associates that career with Richard L. Bayless and the RICK BAYLESS mark.”); *see also Aldrin v. Dunphy*, FA1005001326949 (Nat. Arb. Forum July 8, 2010) (recognizing the common law trademark rights of Buzz Aldrin); *see also Albrecht v. Eric Natale*, FA95465 (Nat. Arb. Forum July 8, 2010) (karlalbrecht.com, author of books and articles on business and marketing); *see also Rattner v. BuyThisDomainName*, WIPO Case No. D2000-0402 (stevenrattner.com, high profile investment banker); *see also Winterson v. Mark Hogarth*, WIPO Case No. D2000-0235 (jeanettewinterston.com,.net and.org, well-known British author); *see also Barry v. For Sale*, FA95110 (Nat. Arb. Forum July 8, 2010) (brittanyandrews.com, “internationally known actress, model, public speaker, and feature entertainer”); *see also McClellan v. For Sale*, DEC/AF-303 (annemclellan.com, annemclellan.org, senior Canadian government official); *see also Frank Risalvato v. Ryan Kovach*, FA83669 (Nat. Arb. Forum Sep. 13, 201) (recognizing the common law trademark of a headhunter in Florida).

3. The rules governing accrual of common law trademark rights in personal names are well established. “To establish common law rights in a personal name, it is necessary to show use of that name as an indication of the source of goods or services supplied in trade or commerce and that, as a result of such use, the name has become distinctive of that source. Upon such proof, a . . . name can serve as a trademark when used to identify the [complainant's] performance services.” *Crichton v. Alberta Hot Rods*, Case No. D2002-0872 (WIPO November 25, 2002) (finding that Complainant had, through use, acquired common law trademark rights in his name).

4. While WIPO has recognized that “[i]t is a basic rule of service mark law in the United States that personal names (combining a first name and surname) are not considered

inherently distinctive,” WIPO has also recognized that “[i]n order to establish common law service mark rights in a personal name, it is necessary to show that the name has acquired secondary meaning among consumers in the relevant market; that is, to show that consumers associate the name with a specific provider of services.” *Lundy v. Idmaond*, D2001-1327 (WIPO Feb. 14, 2002). With that guideline in mind, the Complainant has submitted the evidence enumerated above to the panel of secondary meaning, including countless blog posts, bar membership profiles, Wikipedia articles, videos, litigation filings, and websites demonstrative of the recognition and association of the Complainant and the Mark KENDRICK MOXON.

5. The public, including the Respondent, have come to recognize the Complainant’s Mark as the distinctive identifier that it is, and to know, associate and ascribe secondary meaning between the KENDRICK MOXON Mark and the Complainant’s legal services.

6. The Mark has become famous, and the Complainant had acquired secondary meaning in it for all of the aforesaid reasons.¹ *See Kahn Dev. Co. v. RealtyPROshop.com*, FA 568350 (Nat. Arb. Forum June 23, 2006) (holding that the complainant’s VILLAGE AT SANDHILL mark acquired secondary meaning among local consumers sufficient to establish common law rights where the complainant had been continuously and extensively promoting a real estate development under the mark for several years); *see also Toyota Sunnyvale v. Adfero Publ’g Co.*, FA 921194 (Nat. Arb. Forum Apr. 10, 2007) (concluding that the complainant’s TOYOTA SUNNYVALE mark had acquired secondary meaning sufficient for it to establish common law rights in the mark through continuous and extensive use of the mark since 2003 in connection with a car dealership under that mark).

e. Confusing Similarity

1. 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. The NAF considers the gTLD to be irrelevant to its Policy ¶ 4(a)(i) analysis. *See Trip Network Inc. v. Alviera*, FA 914943 (Nat. Arb. Forum Mar. 27, 2007) (concluding that the addition of a gTLD, whether it be “.com,” “.net,” “.biz,” or “.org,” is irrelevant to a Policy ¶ 4(a)(i) analysis).

f. Rights and Legitimate Interest

1. The Respondent maintains what has come to be known under the UDRP as a “gripe site” or “criticism site.” Throughout hundreds of decisions, the issue of legitimate interest with respect to gripe sites has become settled. Shortly stated, the majority view is now that a respondent is not making legitimate use of a domain name when that respondent uses a

¹In cases decided under the Policy a complainant may demonstrate common law trademark rights if its mark has become associated in the mind of the purchasing public with the complainant’s particular business. Further, “[e]ven if secondary meaning had been acquired only in a limited geographical area, Complainant would nevertheless have established sufficient common law trademark rights within the meaning of Paragraph 1(a)(i) of the Policy,” *Australian Trade Comm’n v. Reader*, D2002-0786 (WIPO November 12, 2002).

complainant's own trademark in the domain to divert the complainant's customers to the gripe site. The recent case of *Dar Al-Arkan Real Estate Development Company v. Anonymous Speech*, D2012-0692 (WIPO June 4, 2012) (ordering transfer of a grip site) illustrates the majority view:

The Panel is aware of the issue whether a criticism site can give rise to a right or legitimate interest for the purpose of Paragraph 4(a)(ii) of the Rules because it amounts to a legitimate noncommercial or fair use of the domain name. This issue was considered at length and the views of UDRP panelists in other cases were reviewed extensively in *Chubb Security Australia PTY Limited v. Mr. Shahim Tahmasebi*, WIPO Case No. D2007-0769. The Panel agrees with the view expressed in this case that it is not legitimate to use the Complainant's own trademark as a platform for criticizing the Complainant itself. Also, as stated in that decision, there is nothing to prevent the Respondent from choosing a domain name that more accurately states its purpose as a criticism site and is not identical or confusingly similar to the Complainant's trademark.

2. The World Intellectual Property Organization (WIPO) itself summarized the majority view on this issue in its 2011 Overview of WIPO Panel Views on Selected UDRP Questions, Second Edition ("WIPO Overview 2.0"):

The right to criticize does not necessarily extend to registering and using a domain name that is identical or confusingly similar to the complainant's trademark. That is especially the case if the respondent is using the trademark alone as the domain name (i.e., <trademark.tld>) as that may be understood by Internet users as impersonating the trademark owner. Where the domain name comprises the protected trademark plus an additional, typically derogatory term (e.g., <trademarksucks.tld>), some panels have applied [the minority view] below.

3. WIPO makes it clear above that the minority view has only been applied when "the domain name comprises the protected trademark plus a . . . derogatory term." Examples of derogatory terms include "sucks," "terrible," "rip off" and the like. In this case, the Disputed Domain contains no derogatory terms necessary to invoke the minority view of those panelists subscribing to it. This analysis is supported, inter alia, by *Skattedirektoratet v. Eivind Nag*, WIPO Case No.D2000-1314, (transferring <skatteetaten.com>); *Myer Stores Limited v. Mr. David John Singh*, WIPO Case No.D2001-0763, (transferring <myeronline.com>), *Triodos Bank NV v. Ashley Dobbs*, WIPO Case No.D2002-0776, (transferring <triodos-bank.com>); *The Royal Bank of Scotland Group plc, National Westminster Bank plc A/K/A NatWest Bank v. Personal and Pedro Lopez*, WIPO Case No.D2003-0166, (transferring <natwestbanksucks.com>); *Kirkland & Ellis LLP v. DefaultData.com, American Distribution Systems, Inc.*, WIPO Case No.D2004-0136, (transferring <kirklandandellis.com>); and others.

4. Like WIPO, the National Arbitration Forum has adopted the majority view and cited the WIPO views in support of its decisions. In *Frank Risalvato v. Ryan Kovach*, FA1008001338369 (Nat. Arb. Forum Sep. 13, 2012), the Panel held:

Use of the disputed domain names that are identical to Complainant's mark is not a *bona fide* offering of goods or services under Policy ¶ 4I(i) or a legitimate

noncommercial or fair use of the disputed domain names under Policy ¶ 4I(iii). See *Compagnie Generale des Matieres Nucleaires v. Greenpeace Int'l*, D2001-0376 (WIPO May 14, 2001) (holding that the respondent's showing that it "has a right to free speech and a legitimate interest in criticizing the activities of organizations like the Complainant . . . is a very different thing from having a right or legitimate interest in respect of [a domain name that is identical to Complainant's mark]"); see also *Monty & Pat Roberts, Inc. v. Keith*, D2000-0299 (WIPO June 9, 2000) ("[T]he Panel does not dispute Respondent's right to establish and maintain a website critical of Complainant . . . However, the panel does not consider that this gives Respondent the right to identify itself as Complainant.")"

5. The Respondent is not making legitimate noncommercial, or fair use of the Disputed Domain pursuant to Policy ¶ 4I(iii). Panels in the past have found that a respondent's use of a disputed domain name in a way that amounts to an attraction of visitors intended for the Complainant is evidence of bad faith registration and use pursuant to Policy ¶ 4(b)(iv). See *Kosmea Pty Ltd. V. Krpan*, D2000-0948 (WIPO Oct. 3, 2000) (finding no rights in the domain name where Respondent has an intention to divert consumers of Complainant's products to Respondent's site by using Complainant's mark); see also *Vapor Blast Mfg. Co. v. R & S Tech., Inc.*, FA 96577 (Nat. Arb. Forum Feb. 27, 2001) (finding that Respondent's commercial use of the domain name to confuse and divert Internet traffic is not a legitimate use of the domain name); see also *Allianz of Am. Corp. v. Bond*, FA 680624 (Nat. Arb. Forum June 2, 2006) (finding bad faith registration and use under Policy ¶ 4(b)(iv) where the respondent was diverting Internet users searching for the complainant to its own website); see also *MySpace, Inc. v. Myspace Bot*, FA 672161 (Nat. Arb. Forum May 19, 2006) (holding that the respondent registered and used the <myspacebot.com> domain name in bad faith by diverting Internet users seeking the complainant's website to its own website).

6. The Respondent has not been commonly known by the name Kendrick Moxon and the Respondent has acquired no trademark or service mark rights in the Complainant's Mark prior to notice of this dispute. The Respondent has not carried on any legitimate business at the Disputed Domain prior to notice of this dispute. See *Singapore Airlines Ltd. V. Robert Nielson (trading as Pacific International Distributors)*, WIPO Case No. D2000-0644 (Aug. 29, 2000). It goes without saying that the Complainant has not authorized, licensed, or otherwise permitted the Respondent to use its Mark or the Disputed Domain.

7. The Complaint prays for a decision of the panel transferring the Disputed Domain to the Complainant.

6. **REMEDY SOUGHT**

The Complainant requests that the Panel issue a decision that the domain-name registrations be transferred to the Complainant. ICANN Rule 3(b)(x); ICANN Policy ¶ 4(i).

7. **OTHER LEGAL PROCEEDINGS**

No other legal proceedings have been commenced or terminated in connection with or relating to the domain name that is the subject of this Complaint. ICANN Rule 3(b)(xi).

8. **COMPLAINANT TRANSMISSION**

The Complainant asserts that a copy of this Complaint, together with the cover sheet as prescribed by NAF's Supplemental Rules, has been sent or transmitted to the Respondent (domain-name holder), in accordance with ICANN Rule 2(b) and to the Registrar(s) of the domain name(s), in accordance with NAF Supp. Rule 4I. ICANN Rule 3(b)(xii); NAF Supp. Rule 4(c).

9. **MUTUAL JURISDICTION**

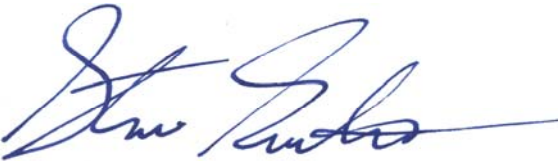
The Complainant will submit, with respect to any challenges to a decision in the administrative proceeding canceling or transferring the domain name, to the jurisdiction of the Registrant. ICANN Rule 3(b)(xiii).

10. **CERTIFICATION**

The Complainant agrees that its claims and remedies concerning the registration of the domain name, the dispute, or the dispute's resolution shall be solely against the domain-name holder and waives all such claims and remedies against (a) the National Arbitration Forum and panelists, except in the case of deliberate wrongdoing, (b) the registrar, (c) the registry administrator, and (d) the Internet Corporation for Assigned Names and Numbers, as well as their directors, officers, employees, and agents.

Complainant certifies that the information contained in this Complaint is to the best of Complainant's knowledge complete and accurate, that this Complaint is not being presented for any improper purpose, such as to harass, and that the assertions in this Complaint 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,
KENDRICK MOXON,
By his attorney,

/s/ 

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Date: July 17, 2014

SCHEDULE OF ANNEXES *ICANN Rule 3(b)(xv).*

Annex A	ICANN Uniform Domain Name Resolution Policy (UDRP)
Annex B	Bar Membership Profiles
Annex C	Injunction Against Respondent
Annex D	Photographs of Respondent Harassing Complainant's Client
Annex E	Police Report, Letter and Criminal Injunction
Annex F	Correspondence Between Complainant and Respondent
Annex G	Wikipedia Article on Complainant
Annex H	Website at the Disputed Domain
Annex I	Third-party Videos of Complainant
Annex J	Sample Litigation Filings
Annex K	Google Search Results for Mark
Annex L	WHOIS Record
Annex M	Screenshots of Website