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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SACV10-00139 AN

CIVIL ACTION NO.:

THINKING LIBERALLY MEDIA, INC.
D/B/A THE LIBERAL OC, a California
Corporation; MADISON ALEXANDER PR,
INC., a California Corporation; DANIEL
CHMIELEWSKI, an individual; CHRIS
PREVATT, an individual; RYAN
TRABUCO, an individual; and CLAUDIO
GALLEGOS, an individual

PLAINTIFF,

vs.

ORANGE JUICE BLOG, a business entity
form unknown; ART PEDROZA, an
individual; and DOES 1-50.

DEFENDANTS.

PLAINTIFF'S ORIGINAL COMPLAINT
FOR DAMAGES AND INJUNCTIVE
RELIEF

- (1) COMMON LAW TRADEMARK INFRINGEMENT;
- (2) CYBERSQUATTING UNDER 15 U.S.C. § 1125(d);
- (3) CYBERSQUATTING UNDER 15 U.S.C. § 1129;
- (4) UNFAIR BUSINESS PRACTICE 17200;
- (5) CONVERSION; and
- (6) CIVIL CONSPIRACY.

PLAINTIFFS, more fully identified below, allege the following:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this case pursuant to 28 U.S.C. §§ 1331 and 1338(a).

2. This Court has personal jurisdiction over the DEFENDANTS based on the following:
(a) DEFENDANTS reside in the State of California, specifically within Orange County; (b) they operate Internet websites accessible to residents of the State of California; (c) the websites are

1 linked to the DEFENDANTS' competitor website, or to websites with content detrimental to the
2 PLAINTIFFS and their affiliates; (d) the DEFENDANTS have committed tortious acts targeting the
3 PLAINTIFFS, which they knew or should have known would cause injury to the PLAINTIFFS in
4 the State of California.

5 3. Venue is proper in United States District Court for the Central District of California
6 under 28 U.S.C. §§ 1391(b) and 1391(c).

7 **PARTIES**

8 4. At all relevant times, PLAINTIFF THINKING LIBERALLY MEDIA, INC. D/B/A THE
9 LIBERAL OC ("LIBERAL OC") is a California Corporation doing business in Orange County.

10 5. At all relevant times, PLAINTIFF MADISON ALEXANDER PR INC. ("MADISON
11 ALEXANDER") is a California Corporation doing business in Orange County.

12 6. At all relevant times, PLAINTIFF DAN CHMIELEWSKI ("CHMIELEWSKI") is an
13 individual residing within this District and is an editor for LIBERAL OC, owner of MADISON
14 ALEXANDER and a shareholder in LIBERAL OC.

15 7. At all relevant times, PLAINTIFF CHRIS PREVATT ("PREVATT") is an individual
16 residing in Los Angeles County, California and is the publisher and an editor for LIBERAL OC and
17 a shareholder in LIBERAL OC.

18 8. At all relevant times, PLAINTIFF RYAN TRABUCO ("TRABUCO") is an individual
19 residing in San Diego County, California and is a website developer that contributed to the
20 development of www.artpedroza.com when defendant ran for Santa Ana City Council.

21 9. At all relevant times, PLAINTIFF CLAUDIO GALLEGOS ("GALLEGOS") is an
22 individual residing in Orange County, California and is a writer for LIBERAL OC.

23 10. Each PLAINTIFF described herein is collectively referred to as ("PLAINTIFFS").

24 11. At all relevant times, DEFENDANT ORANGE JUICE BLOG or www.orangejuice-
25 blog.com ("ORANGE JUICE") is a business entity whose form is currently unknown, which is
26 based out of Orange County, California, started on or about the year 2003.

27 12. At all relevant times, DEFENDANT ART PEDROZA ("PEDROZA") is an individual
28 residing in Orange County, California and is the operator as well as editor and writer for ORANGE

1 JUICE.

2 13. At all times herein DEFENDANT ART PEDROZA was an agent or employee of
3 DEFENDANT ORANGE JUICE, and in doing the things alleged, was acting within the scope of
4 such agency.

5 14. PLAINTIFFS do not know the true names and capacities of the DEFENDANTS sued as
6 DOES 1 through 50 inclusive, and therefore PLAINTIFF sues DEFENDANTS by the foregoing
7 fictitious names. If and when the true names and capacities of these DEFENDANTS become
8 known, PLAINTIFF will amend this Complaint to include such true names, and if necessary seek
9 leave to amend to for add any additional allegations against them.

10 15. Each DEFENDANT described herein is collectively referred to as "DEFENDANTS".

11 16. Any and all references made in this Complaint to any act of the DEFENDANTS shall
12 mean that DEFENDANTS acted individually and jointly with any other possible DEFENDANTS.

13 17. At all relevant times DEFENDANTS knew or realized that they engaged in, planned, or
14 otherwise intended to engage in violations of the law alleged in this Complaint. DEFENDANTS
15 nonetheless facilitated the commission of those unlawful acts.

16 **FACTUAL BACKGROUND**

17 18. On or about September 2004, PLAINTIFF Daniel CHMIELEWSKI formed and
18 incorporated MADISON ALEXANDER PR INC. He named the company after his two children
19 Madison, his daughter now ten and Alexander, his son, now eighteen. At that time, he also
20 purchased the domain name www.madisonalexanderpr.com to be used as the company's website.

21 19. MADISON ALEXANDER as is a public relations company based in Orange County,
22 California that services high technology companies. Specifically MADISON ALEXANDER works
23 with companies in such fields including, but not limited to, web and internet software, infrastructure
24 software, and security products. MADISON ALEXANDER helps companies in these areas with
25 strategic message development, media relations, product review management, investor relations,
26 and other public relations matters.

27 20. MADISON ALEXANDER'S primary asset is the goodwill that CHMIELEWSKI has
28 developed through twenty-five years of hard work.

1 21. On or about April 2006, PLAINTIFF CHRIS PREVATT and Mike Lawson, a non-party
2 to this action founded a blog site LIBERAL OC, located at the web address www.theliberoloc.com.
3 CHMIELEWSKI joined as a blogger for LIBERAL OC in July, 2006. The website and blog are
4 now owned by THINKING LIBERALLY MEDIA INC., a company founded by CHMIELEWSKI
5 and PREVATT. The website's goal is to provide insightful commentary on local, state, and
6 national political issues.

7 22. From the inception of LIBERAL OC, both the blog and its founder CHRIS PREVATT
8 have been targeted by DEFENDANTS, specifically PEDROZA, because of their differences in
9 political views and natural competition for readership. PEDROZA has a history of publishing
10 numerous blog entries or posts in which he harshly attacked CHRIS PREVATT or LIBERAL OC
11 for their ideas and principles and also implied false and malicious statements about both.

12 23. In August, 2008 PEDROZA began a failed run for Santa Ana City Council. TRABUCO
13 was a friend of PEDROZA and a part time website developer. On his own accord, as a volunteer,
14 without any contractor agreement, TRABUCO purchased www.artpedroza.com and designed a
15 website for PEDROZA's political campaign at that web address.

16 24. On or about December 2005, PLAINTIFF CLAUDIO GALLEGOS joined then close
17 friend PEDROZA to contribute to the blog website www.orangejuiceblog.com, where they both
18 wrote commentary articles on Orange County politics.

19 25. From approximately December 2005-2008 both GALLEGOS and PEDROZA continued
20 to have a healthy friendship and write for ORANGE JUICE. However, starting in about 2007 the
21 articles were written on ORANGE JUICE became increasingly negative and malicious in tone and
22 often implied that false or unproven facts were true. This tone was particularly evident in the
23 articles that PEDROZA authored, many of which were directed at LIBERAL OC. GALLEGOS left
24 ORANGE JUICE around April of 2008 for personal reasons but remained friends with PEDROZA.
25 Disturbed by his friend's change in tone; GALLEGOS repeatedly tried to reason with PEDROZA to
26 cease the tone of the blog, which began the deterioration of their friendship.

27 26. On or about March 1, 2009, GALLEGOS founded another web blog of his own,
28 SunnyDblog.com, which also provided commentary on Orange County politics.

1 underage young boys. This is an association with his company, MADISON ALEXANDER, which
2 CHMIELEWSKI neither wants, nor promotes. (Attached hereto as Exhibit 2 is a true and correct
3 copy of the redirect created by DEFENDANTS from www.madisonalexanderpublicrelations.com to
4 the NAMBLA webpage).

5 40. PEDROZA's redirect to the NAMBLA homepage is particularly devastating to
6 CHMIELEWSKI's professional life through MADISON ALEXANDER because it is a public
7 relations firm and the image PEDROZA projected onto the firm is one of illegal homosexual
8 pedophilia and statutory rape.

9 41. This negative image also greatly affects CHMIELEWSKI's personal life and is
10 exacerbated by the fact CHEMIELEWSKI is active with youth in the community. His roles have
11 included PTA member, Former Legislative Action representative for Middle School PTA, Former
12 Cub Scout den leader and cubmaster, Former AYSO soccer commissioner and coach, Former IYBL
13 (Youth Basketball) commissioner, Former Little League manager and coach, Former swim team
14 volunteer, Current girl's basketball coach, and Current Certified AYSO referee.

15 42. CHMIELEWSKI is also concerned for the children in PEDROZA's household. Based
16 upon information and belief, PEDROZA operated ORANGE JUICE from a computer located in the
17 living room of his home, where PEDROZA's young children may be present. It is possible that
18 they may have been exposed to this harmful material, as well as other malicious links detailed *infra*.

19 43. After the sales offer from DEFENDANTS, CHMIELEWSKI contacted DEFENDANTS
20 via electronic mail several times between November 13 and November 16, 2009 to demand that the
21 link be removed and ownership of the domain name returned to him. PEDROZA always refused.

22 44. On or about November 20th, DEFENDANTS actions were exposed in a blog post by
23 LIBERAL OC.

24 45. Thereafter, PEDROZA changed the www.madisonalexanderpublicrelations.com link to
25 redirect visitors first to a blog about "Bad Public Relations," to imply that MADISON
26 ALEXANDER PR was a "bad public relations firm" and then to a hemorrhoids website located at
27 www.complications.com/default.asp?tda=dt&t=8159&fs=-Hemorrhoids, which displayed graphic
28 images of agitated hemorrhoids. (Attached hereto as Exhibit 3 is a true and correct copy of the

1 redirect created by DEFENDANTS from www.madisonalexanderpublicrelations.com to the
2 hemorrhoids webpage).

3 46. On or about November 12, PEDROZA purchased and registered the domain names
4 www.liberalocblog.com, and www.theliberalocblog.com and redirected anyone who visited the web
5 addresses to his own ORANGE JUICE blog. (Attached hereto as Exhibit 4 is a true and correct
6 copy of an email where PEDROZA admits he redirected www.liberalocblog.com to the ORANGE
7 JUICE webpage).

8 47. On or about November 15, PEDROZA redirected www.liberalocblog.com, and
9 www.theliberalocblog.com to take any visitors to the NAMBLA homepage. (Attached hereto as
10 Exhibit 2 is a true and correct copy of the redirect created by DEFENDANTS from
11 www.liberalocblog.com, and www.theliberalocblog.com to the NAMBLA webpage).

12 48. Between about November 12th to 16th CHMIELEWSKI and PREVATT asked
13 PEDROZA return web domains associated with LIBERAL OC and stop his malicious forwarding,
14 but PEDROZA refused.

15 49. On or about November 12, PEDROZA purchased and registered the domain name
16 www.chrisleahprevatt.com and linked it to his own ORANGE JUICE blog. (Attached hereto as
17 Exhibit 4 is a true and correct copy of an email where PEDROZA admits he redirected
18 www.chrisleahprevatt.com to the ORANGE JUICE webpage).

19 50. On or about November 12th, PEDROZA sent an email to PLAINTIFFS including
20 CHMIELEWSKI and PREVATT with a demand to have CHMIELEWSKI give him
21 www.artpedroza.com for free and in return he would sell the web addresses
22 www.liberalocblog.com, www.theliberalocblog.com, and www.chrisleahprevatt.com for a price to
23 be negotiated.

24 51. After CHMIELEWSKI and PREVATT refused to purchase the websites, PEDROZA
25 posted www.liberalocblog.com, www.theliberalocblog.com, and www.chrisleahprevatt.com for sale
26 on godaddy.com, an internet auction site, for a starting price of \$2,000 each for
27 www.liberalocblog.com and www.theliberalocblog.com and \$1,000 for www.chrisleahprevatt.com.
28 (Attached hereto as Exhibit 5 is a true and correct copy of the listing of www.liberalocblog.com,

1 www.theliberalocblog.com, and www.chrisleahprevatt.com on godaddy.com (a domain name
2 merchant) as posted by the DEFENDANTS).

3 52. On average the registration price of such domain names like www.liberalocblog.com,
4 www.theliberalocblog.com and www.chrisleahprevatt.com is approximately \$11. PEDROZA's
5 attempt to sell the former two domain names for \$2,000 at a markup of 18,081% (eighteen thousand
6 and eighty one) or about 182 times the approximate purchase price, and the latter for \$1,000 at a
7 markup of 8,991% (eight thousand nine hundred and ninety one) or about 91 times the approximate
8 purchase price evidences his intention to profit from another's trademark in bad faith.

9 53. On or about November 12th 2009, PEDROZA purchased and registered the domain
10 name www.claudiogallegos.com and linked it to his ORANGE JUICE blog. (Attached hereto as
11 Exhibit 4 is a true and correct copy of an email where PEDROZA admits he redirected
12 www.claudiogallegos.com to the ORANGE JUICE webpage).

13 54. On or about November 12th, PEDROZA sent an email to PLAINTIFFS including
14 GALLEGOS with a demand to make CHMIELEWSKI give him www.artpedroza.com and in return
15 he would sell GALLEGOS the web addresses www.claudiogallegos.com for a price to be
16 negotiated. Also in that email, DEFENDANT bragged to PLAINTIFFS that he "owned Claudio's
17 ass now", referring to GALLEGOS.

18 55. After GALLEGOS refused those terms, PEDROZA posted www.claudiogallegos.com
19 for sale on godaddy.com, an internet auction site for a starting price of \$ 1,000. (Attached hereto as
20 Exhibit 6 is a true and correct copy of the listing of www.claudiogallegos.com on godaddy.com (a
21 domain name merchant) as posted by the DEFENDANTS).

22 56. On average the registration price of such domain name www.claudiogallegos.com is
23 approximately \$11. PEDROZA's attempt to sell this domain name for \$1,000 at a markup of
24 8,991% (eight thousand nine hundred and ninety one) or about 91 times the approximate purchase
25 price evidences his intention to profit from selling an individual his name back in bad faith.

26 57. On or about November 15, 2009 PEDROZA linked www.ryangenetrabuco.com to a
27 website which contained graphic homosexual pornographic images.

28 58. Thereafter, on or about November 2009 PEDROZA published negative material about

1 TRABUCO via blog posts, and Twitter that among other things, that claimed TRABUCO was
2 homosexual.

3 59. On or about November 12th, PEDROZA sent an email to PLAINTIFFS including
4 TRABUCO with a demand to make CHMIELEWSKI give him www.artpedroza.com for free and in
5 return he would sell TRABUCO the web addresses www.ryangenetrabuco.com for a price to be
6 negotiated. After TRABUCO refused those terms, PEDROZA posted www.ryangenetrabuco.com
7 for sale on godaddy.com, an internet auction site for a starting price of \$1,000. (Attached hereto as
8 Exhibit 7 is a true and correct copy of the listing of www.ryangenetrabuco.com on godaddy.com (a
9 domain name merchant) as posted by the DEFENDANTS).

10 60. On average the registration price of such domain names like www.ryangenetrabuco.com
11 is approximately \$11. PEDROZA's attempt to sell this domain name for \$1,000 at a markup of
12 8,991% (eight thousand nine hundred and ninety one) or about 91 times the approximate purchase
13 price evidences his intention to profit from selling an individual his name back in bad faith.

14 61. Later the same day, DEFENDANT PEDROZA contacted all of the PLAINTIFFS via a
15 threatening email, which warned that if he were not given what he termed "his" website, they were
16 all "going to pay dearly". (Attached hereto as Exhibit 8 is a true and correct copy of the email
17 PEDROZA sent containing the language that PLAINTIFFS were "going to pay dearly").

18 62. On or about January 7, 2010 PLAINTIFFS, through counsel, demanded that
19 DEFENDANTS "cease and desist" use of the purchased domain names and transfer ownership to
20 PLAINTIFFS. However, DEFENDANTS still refused the offer.

21 **COMMON LAW TRADEMARK INFRINGEMENT**

22 63. PLAINTIFFS hereby reallege and incorporate herein, by reference the allegations
23 contained in the paragraphs above inclusively.

24 64. PLAINTIFFS MADISON ALEXANDER and LIBERAL OC have each established a
25 trademark at common law. At common law, a trademark may be obtained by (1) adopting and
26 using the trademark in association with goods or services; (2) The mark must be placed in actual use
27 and be associated in the mind of the public with those particular goods or services; (3) The mark
28 must be used in commerce.

1 65. MADISON ALEXANDER has adopted this name as its trademark since 2004 at the date
2 of its incorporation. This trademark is used in association with the corporation's primary service of
3 conducting high technology public relations and marketing communications for profit.

4 66. When conducting a common law trademark search PLAINTIFF MADISON
5 ALEXANDER appears. As such, an ordinary person would know that MADISON ALEXANDER
6 is trademarked. Thus, its use by another or use of a confusingly similar name would infringe on the
7 trademark. "Madison Alexander Public Relations" is used in conjunction with a logo identifying the
8 firm to clients, press, and potential business partners.

9 67. PLAINTIFF LIBERAL OC is an active website begun in 2006 whose name was adopted
10 in association with its blog service that discusses a variety of issues specifically relevant Orange
11 County, California, but not limited to other issues worldwide. As such, LIBERAL OC is a blog
12 widely known within Orange County and leverages this readership into commerce via website
13 advertising.

14 68. Hundreds of people visit LIBERAL OC's web page on a daily basis. Additionally, many
15 agencies post advertisements on LIBERAL OC's page. This exchange of money, information, and
16 ideas, not only makes THE LIBERAL OC mark identifiable to the general public, but significantly
17 involves the mark with commerce.

18 69. Therefore, PLAINTIFFS MADISON ALEXANDER and LIBERAL OC each have an
19 established trademark at common law and accordingly the rights afforded to them cannot be
20 infringed without repercussion.

21 70. As established above, PLAINTIFFS LIBERAL OC and MADISON ALEXANDER each
22 have a trademark at common law.

23 71. These marks were infringed upon when DEFENDANTS used the PLAINTIFF's exact
24 names and/or confusingly similar names by purchasing the domain names of www.liberaloc-
25 blog.com; www.theliberalocblog.com; and www.madisonalexanderpublicrelations.com.

26 72. As mentioned, MADISON ALEXANDER is a corporation whose primary business
27 purpose is to conduct high technology public relations and marketing communications.

28 73. DEFENDANTS, knowing this, proceeded to use PLAINTIFFS' trademarks in the

1 domain names to direct individuals to destination websites of false and/or misleading information.
2 For example www.madisonalexanderpublicrelations.com directs individuals to a site regarding
3 hemorrhoids, which is in no way is connected to the public relations work that MADISON
4 ALEXANDER handles. The linked site itself contains graphic images of agitated hemorrhoids.
5 (See Exhibit 3 attached hereto). This is clear evidence of malice and bad faith caused by
6 DEFENDANTS as a means to inflict irreparable harm the PLAINTIFF's business. Absurdly, when
7 confronted by PLAINTIFFS with the damaging effect the link created, DEFENDANT claimed the
8 link was "educational" in nature.

9 74. In this regard, any reasonable person, many of whom could be potential clients of
10 MADISON ALEXANDER, would be confused as to the true nature of the company and possibly
11 affiliate the unfortunate choice of linked site to the MADISON ALEXANDER mark as well.

12 75. Additionally, as mentioned, LIBERAL OC is a widely known website within Orange
13 County that writes on local political issues. It allows individuals to freely subscribe to the site or
14 simply visit. Many visitors locate the Liberal OC web page through search engines using the search
15 term "Liberal OC blog" or variations thereof.

16 76. LIBERAL OC also has many agencies, candidates, and political organizations who post
17 advertisements on their page. This exchange of money, information, and ideas not only makes
18 LIBERAL OC identifiable to the general public, but significantly ties it to commerce.

19 77. DEFENDANTS have infringed on LIBERAL OC's marks by establishing linked sites
20 with confusingly similar names to that of PLAINTIFF, including www.liberalocblog.com and
21 www.theliberalocblog.com, which currently link to the DEFENDANT's own website
22 www.orangejuiceblog.com, one of THE LIBERAL OC's main competitors.

23 78. These sites misrepresent the nature of LIBERAL OC and its content by presenting
24 information that an average consumer would assume was hosted by LIBERAL OC but in reality is
25 supported by DEFENDANT business rival ORANGE JUICE.

26 79. Additionally, the establishment of confusingly similar websites by the DEFENDANT
27 has caused disruption of LIBERAL OC's commercial advertising and promotion. The value of a
28 website to advertisers is dependant on readership and the siphoning off of potential readers to

1 alternate websites degrades the potential revenue that LIBERAL OC's site could generate.

2 80. DEFENDANTS use the trademarks of LIBERAL OC and MADISON ALEXANDER in
3 domain names, in a manner that causes confusion, mistake, and deception to the actual intent of the
4 companies.

5 81. As a result, DEFENDANTS have violated this common law trademark without consent
6 of the PLAINTIFFS.

7 82. Based on these actions, PLAINTIFFS are entitled to damages as provided by statute and
8 other damages as the court deems proper.

9
10 **CYBERSQUATTING UNDER 15 U.S.C. § 1125(d)**

11 83. PLAINTIFFS hereby reallege and incorporate herein, by reference the allegations
12 contained in the paragraphs above inclusively.

13 84. As previously stated both MADISON ALEXANDER and LIBERAL OC have a
14 trademark at common law. MADISON ALEXANDER has been doing business since 2004 and
15 LIBERAL OC since 2006, each under its own distinctive mark. PLAINTIFF CHMIELEWSKI is
16 the owner of MADISON ALEXANDER through the Corporation MADISON ALEXANDER PR
17 INC. and is also joint owner of LIBERAL OC with PLAINTIFF PREVATT through the corporation
18 THINKING LIBERALLY MEDIA INC.

19 85. On or about November 12, 2009, DEFENDANTS purchased the domain names of
20 www.liberalocblog.com; www.theliberalocblog.com; and www.madisonalexanderpublic-
21 relations.com. The domain names in question are deceptively similar to PLAINTIFF MADISON
22 ALEXANDER and LIBERAL OC trademark to the extent they would easily be mistaken by any
23 reasonable person to be associated to the two companies.

24 86. ART PEDROZA purchased these domain names in bad faith. This is evidenced by his
25 shameless intent to profit from the purchase of these domains accomplished through offers to sell
26 the domain names back to PLAINTIFFS for as much as \$2,000 a piece and to third parties through
27 the auction website godaddy.com for profit. (See Exhibits 1 and 5 attached hereto).

28 87. Additionally, as per DEFENDANTS PEDROZA's own admission, the purchase of the

1 domain names and registration thereof, were done in multiplicity and without regard of the goods or
2 services PLAINTIFFS provide the general public.

3 88. DEFENDANTS were informed of the improper use and nonetheless refuse to relinquish
4 control of the Domain names. Rather, DEFENDANTS used these domain names as a means to
5 direct others to their own personal website, www.orangejuiceblog.com, as well as materials
6 containing obscene and grotesque material.

7 89. In fact, DEFENDANT's threats and purchase of these domain names are by his own
8 admission an attempt to shut down PLAINTIFFS' blog site and to demand a web property
9 belonging to PLAINTIFFS legally, to be given to him at no cost.

10 90. Despite PLAINTIFFS' e-mails to turn over the domain names, DEFENDANTS have
11 refused and instead attempted to continue to profit from their cybersquatting scheme, by putting up
12 for sale, selling, and/or auctioning the domains to third parties for a profit in blatant disregard of
13 PLAINTIFFS rights.

14 91. Based on these actions, PLAINTIFFS are entitled to return of the domain names,
15 damages as provided by statute and other damages the court deems proper.

16
17 **CYBERSQUATTING UNDER 15 U.S.C. § 1129**

18 92. PLAINTIFFS hereby reallege and incorporate herein, by reference the allegations
19 contained in the paragraphs above inclusively.

20 93. As previously stated CHMIELEWSKI, PREVATT, TRABUCO, and GALLEGOS are
21 individuals residing in the district and connected in some fashion to LIBERAL OC and or
22 DEFENDANTS.

23 94. On or about November 12, 2009, DEFENDANTS purchased the domain names of
24 www.claudiogallegos.com, www.chrisleahprevatt.com, and www.ryangenetrabuco.com. The
25 websites names match exactly to the names of the living individuals mentioned above.

26 95. DEFENDANTS have acted in bad faith in regards to their purchase and use of the
27 domains listed above.

28 96. This is evidenced by DEFENDANTS' attempts to sell the domain names to any person

1 or third party for financial gain, including, but not limited to the PLAINTIFFS themselves. These
2 actions were done without the consent of the individual PLAINTIFFS. (See Exhibits 1,4,5,6, and 7
3 attached hereto).

4 97. Furthermore, as per DEFENDANTS' own admission, the purchase of the domain names
5 and registration thereof, were done in multiplicity and without regard to the PLAINTIFFS
6 individual cyber privacy.

7 98. DEFENDANTS were informed of the improper use and nonetheless refuse to relinquish
8 control of the domain names to PLAINTIFFS. Rather, DEFENDANTS used these sites as a means
9 to direct others to their own personal website, www.oranejuiceblog.com, or to various other sites to
10 harm the reputation of PLAINTIFFS (See Exhibits 2 and 3 attached hereto). Many of those sites
11 contain obscene and pornographic content. One specific site was the North American Man Boy
12 Love Association (NAMBLA), which is a group that promotes sexual relations between older men
13 and underage boys. The links to the domain names in question are of material that is detrimental to
14 the PLAINTIFFS and that they do not endorse. In fact, DEFENDANTS' threats and purchasing of
15 these domains are by his own admission an attempt to harm the individual PLAINTIFFS.

16 99. At multiple points PLAINTIFFS requested that DEFENDANTS cease and desist in their
17 harmful actions, but DEFENDANTS consistently refused and attempted to negotiate a "trade" and
18 resale of the domain names involved that was unacceptable to PLAINTIFFS.

19 100. To date, despite PLAINTIFFS' e-mails to relinquish the domain names back to his
20 rightful control, DEFENDANTS continue to profit from their cybersquatting scheme, by offering
21 sale, selling, and/or otherwise auctioning the domains to third parties for profit.

22 101. In offering the domain names for sale to PLAINTIFFS, DEFENDANTS demonstrated an
23 illegal intent to profit from the registration of the domain names derived from PLAINTIFFS' names.

24 102. Based on these actions, PLAINTIFFS are entitled to return of the domain names,
25 damages as provided by statute and other damages as the court deems proper.

26
27 **UNFAIR BUSINESS PRACTICE § 17200**

28 103. PLAINTIFFS hereby reallege and incorporate herein, by reference the allegations

1 contained in the paragraphs above inclusively.

2 104. As previously stated DEFENDANT PEDROZA is the sole owner of the California
3 business entity www.orangejuiceblog.com.

4 105. The orangejuiceblog.com specializes in political news commentary regarding primarily
5 Orange County. It is delivered to readers via blog format.

6 106. As previously stated The PLAINTIFFS LIBERAL OC and MADISON ALEXANDER
7 PR are California business entities.

8 107. LIBERAL OC specializes in political news commentary regarding primarily Orange
9 County. It is also delivered to readers via a blog format.

10 108. DEFENDANTS have engaged in unfair competition, specifically PEDROZA's purchase
11 of the domain names www.liberalocblog.com, www.theliberalocblog.com, and
12 www.madisonalexanderpublicrelations.com and other acts detailed *supra*.

13 109. Whereas DEFENDANTS have engaged in deceptive, untrue, misleading, and unfair
14 business practices towards the PLAINTIFFS.

15 110. For example, DEFENDANTS linked www.liberalocblog.com and www.theliberaloc-
16 blog.com to the North American Man Boy Love Association, NAMBLA.com, which is a group that
17 promotes sexual relations between older men and underage boys. Thus, a reasonable person would
18 be deceived into associating NAMBLA.com to LIBERAL OC, which is untrue and misleading.

19 111. The DEFENDANTS have also linked www.liberalocblog.com and
20 www.theliberalocblog.com to their own competitor site the orangejuiceblog.com. This is an unfair
21 action towards the PLAINTIFFS as it falsely directs individuals looking for the real website of
22 LIBERAL OC to a competitor site. These actions also interfere with potential advertising profits to
23 be made by PLAINTIFFS on their website.

24 112. DEFENDANT PEDROZA has posted blogs on orangejuiceblog.com entitled "Who
25 Killed THE LIBERAL OC Blog?", where he claims because "Dan and Chris recently lost control
26 of two URLs – www.liberalocblog.com and www.theliberalocblog.com. Their numbers are going
27 to suffer even more now!" (Attached hereto as Exhibit 9 are true and correct copies of the article
28 from orangejuiceblog.com). The amount of visitors a websites has translates into more potential

1 businesses wanting to advertise on a website as they know people are going to see their
2 advertisements on the particular site.

3 113. The amount of hits a websites gets can translate into more businesses wanting to
4 advertise on the website, as they know people are going to see their advertisements on the particular
5 site. The DEFENDANTS have deceived individuals, by directing websites bearing strikingly
6 similar domain names to the actual LIBERAL OC website, which show materials that are untrue to
7 what LIBERAL OC promotes. Therefore, DEFENDANTS have engaged in unfair competition,
8 with LIBERAL OC.

9 114. Furthermore, the DEFENDANT linked the above-mentioned domain names, which bear
10 exact parts of the names of the PLAINTIFFS' business entities mentioned above, to websites
11 containing obscene material, including NAMBLA.com a website promoting sexual relations
12 between underage boys and adult men.

13 115. Based on these actions, PLAINTIFFS are entitled to return of the domain names,
14 damages as provided by statute and other damages as the court deems proper.

15 CONVERSION

16 116. PLAINTIFFS hereby reallege and incorporate herein, by reference the allegations
17 contained in the paragraphs above inclusively.

18 117. DEFENDANTS have wrongfully exercised the purchase and sale use of the domain
19 names: www.madisonalexanderpublicrelations.com; www.liberalocblog.com;
20 www.theliberalocblog.com; www.claudiogallegos.com; www.chrisleahprevatt.com; and
21 www.ryangenetrabuco.com.

22 118. PLAINTIFFS had a right to possess said domain names based on the aforementioned
23 violations of the cybersquatting within 15 U.S.C. § 1125(d) and 15 U.S.C. § 1129, as evidenced by
24 PLAINTIFFS' common law trademarks established above or by DEFENDANT PEDROZA's bad
25 faith and attempts to profit on said domain names.

26 119. Despite PLAINTIFFS' rights to the property, DEFENDANTS intentionally bought said
27 domain names with the purpose to use them in bad faith and sell them for a profit, moreover with
28

1 the malicious purpose of preventing PLAINTIFFS from having access to those domain names
2 mentioned above.

3 120. DEFENDANTS' acted without consent of PLAINTIFFS.

4 121. As a result of DEFENDANTS' actions, PLAINTIFFS were harmed in an amount to be
5 proven at trial and DEFENDANTS were a substantial factor in the causing of this harm.

6 122. Based on these actions, PLAINTIFFS are entitled to damages as provided by statute and
7 other damages as the court deems proper.

8
9 **CIVIL CONSPIRACY**

10 123. PLAINTIFFS hereby reallege and incorporate herein, by reference the allegations
11 contained in the paragraphs above inclusively.

12 124. As previously stated, DEFENDANT PEDROZA is the sole owner of the California
13 business entity orangejuiceblog.com.

14 125. As previously stated, DEFENDANT ORANGE JUICE is political blog based out of
15 Orange County, with multiple other contributors and writes aside from DEFENDANT PEDROZA.

16 126. PEDROZA has participated in acts of unfair business and cybersquatting a previously
17 mentioned against PLAINTIFFS in regards to the purchase of use of said domain names.

18 127. As such, these acts by the DEFENDANT concerning PLAINTIFFS have caused the
19 PLAINTIFFS harm.

20 128. Since many of said domain names made by DEFENDANT PEDROZA link directly
21 ORANGE JUICE it is permissible to say that ORANGE JUICE and the rest of its contributors knew
22 of the wrongful acts taking place, on the website.

23 129. Therefore, DEFENDANT ORANGE JUICE can be seen as conspirators to commit
24 multiple wrongful acts of cybersquatting and unfair business practices in association with
25 DEFENDANT PEDROZA because they could not have been independently accomplished and
26 could only have been performed through mutual agreement of the two parties to do so.

27 130. DOE DEFENDANTS engaged with PEDROZA to accomplish the wrongful acts herein
28 alleged pursuant to, and in furtherance of, the conspiracy. DOE DEFENDANTS furthered the

1 conspiracy by cooperation with or encouragement to ratify or adopt the acts of DEFENDANTS
2 PEDROZA and ORANGE JUICE. PLAINTIFFS will amend this complaint to allege DOE
3 DEFENDANTS true names and capacities when ascertained.

4 131. Based on these actions, PLAINTIFFS are entitled to damages as provided by statute and
5 other damages as the court deems proper.

6
7 **PRAYER FOR RELIEF**

8 WHEREFORE, PLAINTIFFS pray for judgment as follows:


- 9 1. For actual and compensatory damages;
10 2. For restitution of all monies due to PLAINTIFF;
11 3. For disgorgement of profits and other equitable relief;
12 4. For interest accrued to date pursuant to applicable law;
13 6. For penalties pursuant to applicable California and federal law;
14 7. For punitive damages;
15 8. For attorneys' fees pursuant to statute;
16 9. For costs of suit incurred herein;
17 10. For injunctive and/or other remedial equitable relief;
18 11. For nominal damages;
19 12. For liquidated damages pursuant to applicable law; and
20 13. For such other relief as the Court deems just and proper.

21 **DEMAND FOR JURY TRIAL**

22 Plaintiffs hereby demand a trial by jury in this action on all issues triable by jury.

23
24 Respectfully Submitted,

25 Dated: February 5, 2010

26 
27 _____
28 Todd E. Gallinger Esq.
Attorney for PLAINTIFFS

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EXHIBIT 1

Username/Customer #

Password

[Create Account](#) | [Forgot Password](#) | [Sign Out](#)

[Deals of the Day](#)

[HOME](#)

[Domain Auctions](#)

[Marketplace](#)

[Support & Community](#)

[Domains](#)

[Hosting](#)

[Email](#)

[Site Builders](#)

[Business](#)

[SSL Certificates](#)

[Resellers](#)

Get your domain in 3 easy steps!

[Search](#)

[Customize](#)

[Checkout](#)

[No d](#)

[Show All My Products](#)

MadisonAlexanderPublicRe lations.com is available as a Premium

This Premium Domain Name can be purchased for \$1,000.00*.

- [What is a Premium Domain Name?](#)
- For more information on this domain, call (480) 366-3343.

YOU can negotiate anything.
6 quick tips for doing it right.
Plus ... a Smoking Hot Blonde!
 "Fantastic info with great presentation."
 - Miss Deb

[Select All](#)


[More Domain Op](#)

<input checked="" type="checkbox"/>	madisonalexanderpublicrelations.com	Premium Domain price \$1,0	
<input type="checkbox"/>	madisonalexanderpublicrelations.info	\$0.89*	BEST V.
<input type="checkbox"/>	madisonalexanderpublicrelations.net	\$9.99*/yr SALE!	Save \$3
<input type="checkbox"/>	madisonalexanderpublicrelations.org	\$14.99*/yr	
<input type="checkbox"/>	madisonalexanderpublicrelations.me	\$8.99 SALE!	Save \$1
<input type="checkbox"/>	madisonalexanderpublicrelations.mobi	\$7.99*	Save \$7
<input type="checkbox"/>	madisonalexanderpublicrelations.us	\$5.99 SALE!	SPECIA
<input type="checkbox"/>	madisonalexanderpublicrelations.biz	\$9.99* SALE!	Save \$5

No domains pending registration.

Search for another domain

Enter a domain name:

.com 

Pricing includes over Over \$100+ in **FREE extras.**

[General](#)

[Country/Region](#)

[Bulk](#)

General Domain TLD Extensions

[.com](#)

The most popular domain! Do you have yours?

- .info** Put your information on the Web.
- .net** The perfect complement to a .COM.
- .org** Perfect for your non-profit.
- .me** A domain that's all about YOU.
- .mobi** Give customers on-the-go access to your site.
- .us** Get your hands on the all-American domain.
- .biz** A domain that means business.
- .ws** An all-purpose Web Site Domain.
- .asia** Reach the growing Asian market.
- .cc** There's only one domain for the Cocos Islands - .cc

*, **, ***, †, ††, ††† [Click here for product disclaimers and legal policies](#)

Sign up for special offers:

Account Manager

- My Account
- My Renewals
- My Upgrades
- Account Settings
- Customer Information
- Order History
- Create Account

Shopping

- * Offer Disclaimers
- Domain Search
- Product Catalog
- Product Advisor
- Gift Cards
- Go Daddy Mobile
- Today's Offers

Resources

- Webmail
- WHOIS search
- ICANN Confirmation
- Affiliates
- Connect with Us
- Gadgets/Widgets
- Site Map

Help and Support

- Telephone Support & Sales
- Billing Support
- Email Our Support Team
- Frequently Asked Questions
- User's Guides
- Report Spam
- Test Our Products

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GoDaddy.com is the world's No. 1 ICANN-accredited domain name registrar for .COM, .NET, .ORG, .INFO, .BIZ and .US

Copyright © 1999 - 2010 GoDaddy.com, Inc. All rights reserved.

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EXHIBIT 2

www.NAMBLA.org

The On-Line Voice of the North American Man/Boy Love Association

Topics

[The Criminalization of Youth](#)

[Youth Views and Issues](#)

[The Criminal Injustice System](#)

[Stories of Man/Boy Love](#)

[Personal Experience](#)

[Social Issues](#)

[Biography](#)

[History](#)

[Psychology](#)

[Social and Biological Sciences](#)

[Cross-Cultural Studies](#)

[Art](#)

[Literature](#)

[Music](#)

[Poetry](#)

[Film & Television](#)



Youth in White Trousers
Henry Scott Tuke, 1900

[NAM Welc
NAM Page!](#)

[Who](#)

Current Features

PRESS RELEASE:

Guilt By Association, Twice Removed
The rightwing media elements are at it again. One of their most recent attacks has been aimed at Kevin Jennings, the Safe Schools Czar nominee. [\(more ...\)](#)

The Lie Of Freedom Versus the Truth Of Family

A remembrance of a Nobel Prize winner persecuted for loving boys [\(more ...\)](#)

Walking the Line (again)

Years ago, members of NAMBLA had the audacity to demonstrate in front of Bridgewater State Hospital. The demonstrators marched with signs denouncing the treatment of men being held for consensual relationships outlawed by the state [\(more ...\)](#)

[How](#)

[How](#)

[Publi](#)

[Book](#)

[What Sayir](#)

[Reco Read](#)

[Boys](#)

[Priso](#)

[More Us](#)

**Sex Panic: The
Juggernaut**

[Extreme
Sentencing](#)

[The Recidivism
Hoax](#)

[Indefinite
Confinement](#)

[Registration &
Notification](#)

Prison Scandal at Coalinga

Denizens of the state "mental health" prison in Coalinga, California are challenging the conditions of their confinement. The death of an inmate has brought attention to the conditions at the facility. [\(more ...\)](#)

Teen Torture On Trial

The case of the killing of 14-year-old Martin Lee Anderson by guards at a state-run juvenile "boot camp" in Florida has put the spotlight on violence in youth detention centers. [\(more ...\)](#)



Is Well-Meaning Good Enough?

"Reform Sex Offender Laws", the latest voice for common sense, has a new web site. NAMBLA takes a hard look at whether they really get to the point [\(more ...\)](#)

Lawsuit Against NAMBLA Members Withdrawn

Eight long years after it was filed, a lawsuit blaming NAMBLA members for the tragic death of a young Boston-area boy has been withdrawn, following a request by the judge to see the evidence. [\(more ...\)](#)

Discussions

NARTH -- What do you think?

Feature Archive

[Harry Hay and the Roots of the Gay Movement](#)

[Pederasty and Homosexuality](#)

"The On-Line Voice of the North American Man/Boy Love Association"

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EXHIBIT 3



Home



A B C D E
F G H I J
K L M N O
P Q R S T
U V W X Y
Z A - Z Index

- > Addiction
> Aging
> Alternative Medicine
> Arthritis
> Asthma
> Bad Faith Insurance
> Cancer
> Cold and Flu
> Cosmetic Surgery
> Defective Medical Devices

Symptoms & Complications

Hemorrhoids

Hemorrhoids are veins on or around the anus. Usually the vein walls have been inflamed. This allows blood to pool, causing the walls of the vein to expand. In some during and after bowel movements.

By age 50, more than half of adults have to deal with the itching and pain associated with hemorrhoids.

Hemorrhoid symptoms are divided into two categories based on their location:



Sponsored Results for Hemorrhoids remedy

Hemorrhoid Treatment Reviews

Compare leading brands proven to safely treat hemorrhoids fast. http://AdvancedHealthCh ...

Hemorrhoid Remedy - Guaranteed Results

Natural hemorrhoid remedy. Eliminate hemorrhoids with no burning or scarring. Guaranteed results or your money back, Try Risk Free. http://www.amoils.com/

Surgery for Hemorrhoids

Leading the Quest for Hemorrhoid Treatment, Surgery & Information. http://Cedars-Sinai.edu/

Internal hemorrhoids. You can't see or feel these hemorrhoids. But straining or irritation from passing stool can injure a hemorrhoid's delicate surface and cause it to bleed. You may notice small amounts of bright red blood on your toilet tissue or in the toilet bowl water. Because internal anal membranes lack pain-sensitive nerve fibers, these hemorrhoids usually don't cause discomfort. Occasionally, straining can push an internal hemorrhoid through the anal opening. If a hemorrhoid remains displaced (prolapsed), it can cause pain and irritation.

External hemorrhoids. These hemorrhoids are painful. Sometimes blood may pool in an external hemorrhoid and form a clot (thrombus), causing severe pain, swelling and inflammation. When irritated, external hemorrhoids can itch or bleed.

Treatments

Hydrocortisone suppositories

Most common treatment is Hydrocortisone suppositories that are used only in the rectum.

Infrared photocoagulation for hemorrhoids

Infrared photocoagulation (coagulation therapy) is a medical out-patient procedure to treat hemorrhoids. During the this procedure, an intense beam of infrared light is directed to a small to medium size hemorrhoid tissue. Heat created by the infrared light causes scar tissue. Gradually, the blood supply is cut off from an active hemorrhoid.

Lasers have not been proven to be more effective than coagulation therapy. Laser surgery is more expensive. Check surgery cost here. There's also a greater risk to damage surrounding tissue.

Homeopathic remedies for hemorrhoids combined with a rich fiber diet can be helpful.

Sponsored Results for Hemorrhoids remedy

Hemorrhoids - Apply, Shrink, Remove

100% Organic Hemorrhoid Removal Treatment. Results are Guaranteed. http://www.NaturesPharm ...

Sponsored Results

Hemorrhoid Treatment Reviews

Compare leading brands proven to safely treat hemorrhoids fast. http://AdvancedHealthCh ...

Hemorrhoid Remedy - Guaranteed Results

Natural hemorrhoid remedy. Eliminate hemorrhoids with no burning or scarring. Guaranteed results or your money back, Try Risk Free. http://www.amoils.com/

Search input field

Search

Web This Site

Hemorrhoids Removal

Remove Hemorrhoids with CRH O'Regan Disposable Banding System.
<http://www.crhsystem.com/>

Why Suffer From Hemorrhoids?

Cure Hemorrhoids In 3 Days with Natural Methods - Safe Fast Effective
[http://www.CureMyHemorr ...](http://www.CureMyHemorr...)

See Also: Over The Counter (OTC) , Weight Loss

Uri

Submitted 139 article(s).

Last Updated: 10/07/2008

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THIS DOMAIN MAY BE FOR SALE

<http://www.complications.com/default.asp?tda=dt&t=8159&fs=Hemorrhoids>

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EXHIBIT 4

Received: from elasntp-banded.atl.sa.earthlink.net ([209.86.89.70])
 by eastrmimpi03.cox.net with IMP
 id 4TmJld02XlX4A0p01TmJNB; Thu, 12 Nov 2009 22:46:19 -0500

Received: from eastrmimpi03.cox.net ([68.1.16.121])
 by eastrmmtail09.cox.net
 (InterMail vM.8.00.01.00 201-2244-105-20090324) with ESMTMP
 id <20091113034619.XUEX3688.eastrmmtail09.cox.net@eastrmimpi
 for <dchm@cox.net>; Thu, 12 Nov 2009 22:46:19 -0500

Received: from [76.218.198.144] (helo=ArtPC)
 by elasntp-banded.atl.sa.earthlink.net with esmtpa (Exim 4.67)
 (envelope-from <apedroza@earthlink.net>)
 id 1N8n71-0007SC-KM; Thu, 12 Nov 2009 22:46:16 -0500

Return-Path: <apedroza@earthlink.net>
 Return-Receipt-To: "apedroza" <apedroza@earthlink.net>
 Reply-To: <apedroza@earthlink.net>
 From: "apedroza" <apedroza@earthlink.net>
 To: "'Dan Chmielewski'" <dchm@cox.net>
 Cc: "'Chris Prevatt'" <CLP@ChrisPrevatt.com>,
 "Claudio Gallegos " <cw_gallegos@yahoo.com>,
 "Ryan Gene Williams Trabuco" <ryantrabuco@yahoo.com>,
 <janet@janetnguyen.com>,
 "Nguyen, Janet" <janet.nguyen@ocgov.com>,
 <tbonikow@yahoo.com>,
 "'Mr. Sean H. Mill'" <Seanhmill@gmail.com>,
 "Paul Lucas" <ocnatedem1@aol.com>,
 "'Andrew Do'" <andrew@andrewdo.com>

Subject: Venganza
 Date: Thu, 12 Nov 2009 19:46:12 -0800
 Message-ID: <!&!AAAAAAAAAAAYAAAAAAAAAAOzn1NcxgZVMgr8yWY5XeJzCgAAAEAAAAE
 MIME-Version: 1.0
 Content-Type: multipart/alternative;
 boundary="-----_NextPart_000_01D9_01CA9864.2D5E0B50"
 X-Priority: 1 (Highest)
 X-MSMail-Priority: High
 X-Mailer: Microsoft Office Outlook 12.0
 Thread-Index: AcpkE9OPDeVxbCUBS0SJYWHYaw877g==
 Content-Language: en-us
 Importance: High
 x-originating-ip: 76.218.198.144
 x-elnk-trace: 09a3c71ca2ccebdlaa676d7e74259b7b3291a7d08dfec799dcdd2a7
 Disposition-Notification-To: "apedroza" <apedroza@earthlink.net>

This is a multi-part message in MIME format.

-----_NextPart_000_01D9_01CA9864.2D5E0B50
 Content-Type: text/plain;
 charset="us-ascii"
 Content-Transfer-Encoding: 7bit

Dan,

How very clever. When I realized a few months ago that my personal url no longer pointing to the business site that Ryan Trabuco created for called him and emailed him and asked him to cede the url to me. Appar he sold it to you instead. So now of course it is on!

I will be sure to tell Ryan's future clients about how he handles their privacy and their urls. And I bought www.ryangenetrabuco.com. Pointe to a post by Sean that mentions how Ryan is the Jannie webmaster. May it to something juicier later.

I also purchased www.liberalocblog.com and it is now pointed to my blo And I also bought www.theliberalocblog.com. It is amazing that you di buy them. I could see folks typing either of those, in an attempt to you. Well, they certainly won't find your sad little blog now.

I also bought www.claudiogallegos.com and that too is pointing to my b I don't know how much you paid to acquire Claudio but I own his ass no also now own www.chrisleahprevatt.com. Both are pointed to their respective OJ tags.

And I bought www.madisonalexanderpublicrelations.com. It is now point our Dan C. tag.

And I bought www.supervisorjanetnguyen.com - and about a half dozen ot permutations of that site. All of those are now pointing to our "Jann tag, which includes Paul Lucas' posts about the Jannies.

And why stop there? I also bought www.leessandwichesstanton.com. Tha pointing to our stories about their health violations. And I bought www.councilmanandrewdo.com. That is pointing to the story about his carpet-bagging.

Needless to say, Janet and Andew are going to pay dearly for Ryan's

transgression, as are all of you.

BTW, we currently are at over 1,600 hits today. Your sad little blog i 305 hits. Really, why even bother? And no, I don't care what klowncan to say about this.

Lastly, if you folks are interested in your URLs, you will need to ced url and Sean's to us (I saw that Ryan bought Sean's urls). And then w negotiate how much you will be paying for each url.

If not, then things shall stay as they are. Enjoy!

XOXOXOX,

Art Pedroza

Editor

Orange Juice Blog

<http://www.orangejuiceblog.com>

Orange County' s first political blog, since 2003!

(714) 606-7622

Email: apedroza@earthlink.net

Facebook <<http://www.facebook.com/home.php#/home.php?ref=home>>

Twitter <<http://twitter.com/orangejuiceblog>>

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reply email, and delete the message and all attached files. Thank you

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-----=_NextPart_000_01D9_01CA9864.2D5E0B50
Content-Type: text/html;
    boundary="-----_NextPart_000_00A7_01CA63D0.CAC7A770";
    charset="us-ascii"
Content-Transfer-Encoding: quoted-printable

<html xmlns:v=3D"urn:schemas-microsoft-com:vml" =
xmlns:o=3D"urn:schemas-microsoft-com:office:office" =
xmlns:w=3D"urn:schemas-microsoft-com:office:word" =
xmlns:m=3D"http://schemas.microsoft.com/office/2004/12/omml" =
xmlns=3D"http://www.w3.org/TR/REC-html40">

<head>
<meta http-equiv=3DContent-Type content=3D"text/html; =
charset=3Dus-ascii">
<meta name=3DGenerator content=3D"Microsoft Word 12 (filtered medium)"
<style>
<!--
/* Font Definitions */
@font-face
    {font-family:"Cambria Math";
    panose-1:2 4 5 3 5 4 6 3 2 4;}
@font-face
    {font-family:Calibri;
    panose-1:2 15 5 2 2 2 4 3 2 4;}
@font-face
    {font-family:"Script MT Bold";
    panose-1:3 4 6 2 4 6 7 8 9 4;}
/* Style Definitions */
p.MsoNormal, li.MsoNormal, div.MsoNormal
    {margin:0in;
    margin-bottom:.0001pt;
    font-size:11.0pt;
    font-family:"Calibri","sans-serif";}
a:link, span.MsoHyperlink
    {mso-style-priority:99;
    color:blue;
    text-decoration:underline;}
a:visited, span.MsoHyperlinkFollowed
    {mso-style-priority:99;
    color:purple;
    text-decoration:underline;}
span.EmailStyle17
    {mso-style-type:personal-compose;
    font-family:"Calibri","sans-serif";

```

```

        color:windowtext;}
.MsoChpDefault
    {mso-style-type:export-only;}
@page Section1
    {size:8.5in 11.0in;
    margin:1.0in 1.0in 1.0in 1.0in;}
div.Section1
    {page:Section1;}
-->
</style>
<!--[if gte mso 9]><xml>
    <o:shapedefaults v:ext=3D"edit" spidmax=3D"1026" />
</xml><![endif]--><!--[if gte mso 9]><xml>
    <o:shapelayout v:ext=3D"edit">
        <o:idmap v:ext=3D"edit" data=3D"1" />
    </o:shapelayout></xml><![endif]-->
</head>

<body lang=3DEN-US link=3Dblue vlink=3Dpurple>

<div class=3DSection1>

<p class=3DMsoNormal>Dan,<o:p></o:p></p>

<p class=3DMsoNormal><o:p>&nbsp;</o:p></p>

<p class=3DMsoNormal>How very clever.&nbsp;  When I realized a few mont
ago that
my personal url was no longer pointing to the business site that Ryan
Trabuco
created for me, I called him and emailed him and asked him to cede the
url to
me.&nbsp;  Apparently he sold it to you instead.&nbsp;  So now of course
it is on!<o:p></o:p></p>

<p class=3DMsoNormal><o:p>&nbsp;</o:p></p>

<p class=3DMsoNormal>I will be sure to tell Ryan's future client
about how
he handles their privacy and their urls.&nbsp;  And I bought <a
href=3D"http://www.ryangenetrabuco.com">www.ryangenetrabuco.com</a>.&n
; Pointed
it to a post by Sean that mentions how Ryan is the Jannie =
webmaster.&nbsp;  May
point it to something juicier later.<o:p></o:p></p>

<p class=3DMsoNormal><o:p>&nbsp;</o:p></p>

<p class=3DMsoNormal>I also purchased <a =
href=3D"http://www.liberalocblog.com">www.liberalocblog.com</a>

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and it is now pointed to my blog. And I also bought www.theliberalocblog.com. It is amazing that you did not buy them. I could see folks typing = either of those, in an attempt to find you. Well, they certainly won’ find your sad little blog now.<o:p></o:p></p>

<p class=3DMsoNormal><o:p> </o:p></p>

<p class=3DMsoNormal>I also bought www.claudiogallegos.com and that too is pointing to my blog. I don’t know how much you paid to acquire Claudio but I own his ass now. I also now own www.chrisleahprevatt.com. Both are pointed to their respective OJ tags.<o:p></o:p></p>

<p class=3DMsoNormal><o:p> </o:p></p>

<p class=3DMsoNormal>And I bought www.madisonalexanderpublicrelations.com. It is now pointed to our Dan C. tag.<o:p></o:p></p>

<p class=3DMsoNormal><o:p> </o:p></p>

<p class=3DMsoNormal>And I bought www.supervisorjanetnguyen.com – and about a half dozen other permutations of that site. All of those are now pointing to our “Jannies” tag, which include Paul Lucas’ posts about the Jannies.<o:p></o:p></p>

<p class=3DMsoNormal><o:p> </o:p></p>

<p class=3DMsoNormal>And why stop there? I also bought www.leessandwichesstanton.com. That is pointing to our stories about their health violations. A I bought www.councilmanandrewdo.com. That is pointing to the story about his carpet-bagging.<o:p></o:p></p>

Needless to say, Janet and Andrew are going to pay dearly for Ryan's transgression, as are all of you.

BTW, we currently are at over 1,600 hits today. = Your sad little blog is at 305 hits. Really, why even bother? And n I don't care what klowncast has to say about this.

Lastly, if you folks are interested in your URLs, you will need to cede my url and Sean's to us (I saw that Ryan bought = Sean's urls). And then we can negotiate how much you will be paying for each url.

If not, then things shall stay as they are. = Enjoy!

XOXOXOX,

**Art
Pedroza**

Editor

Orange Juice Blog

<http://www.orangejuiceblog.com>

Orange County's first political blog, since = 2003!

(714) 606-7622

<p class=3DMsoNormal>Email: apedroza@earthlink.net<o:p></o:p></p>

<p class=3DMsoNormal>Facebook<o:p></o:p></p>

<p class=3DMsoNormal>Twitter<o:p></o:p></p>

<p class=3DMsoNormal style=3D'margin-bottom:6.0pt'><o:p> </o:p></p>

<p class=3DMsoNormal style=3D'margin-bottom:6.0pt'>Notice: <o:p> </o:p></p>
This message is intended only for use by the person or entity to which it is addressed. <o:p> </o:p></p>
Because it may contain confidential information intended solely for the addressee, you are notified that any disclosing, copying, downloading, distributing or retaining of this message, and any attached files, is prohibited and may be a violation of state or federal law. <o:p> </o:p></p>
If you received this message in error, please notify the sender by reply email and delete the message and all attached files. <o:p> </o:p></p>
Thank you.<o:p></o:p></p>

<p class=3DMsoNormal><o:p> </o:p></p>

</div>

</body>

</html>

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EXHIBIT 5

1-800-368-6977

Log in to Account: Username/Customer # Password



Home Accounts Marketplace Media Support & Community Bob's Video Blog

Domains Hosting Email Site Builders Business SSL Certificates Resellers Start Domain Search

Add 6 more domains and GET BULK PRICING!***

Search Register Customize Checkout No domains pending registration.

TheLiberalLocBlog.com is available as a Premium Domain Name!

[click here for info!](#)

This Premium Domain Name can be purchased for \$2,000.00*.
 ■ [What is a Premium Domain Name?](#)
 ■ For more information on this domain, call (480) 366-3343.

[View register multiple domains?](#)

Select All

More Domain Options

We also recommend...

Domain	Price	Special Offer	Additional	Premium	International
<input checked="" type="checkbox"/> theliberallocblog.com	Premium Domain price \$2,000.00				
<input type="checkbox"/> theliberallocblog.info	\$0.99*	BEST VALUE!			
<input type="checkbox"/> theliberallocblog.net	\$9.99*/yr SALE!	Save \$3.00/yr			
<input type="checkbox"/> theliberallocblog.org	\$9.99* SALE!	Save \$5.00/yr			
<input type="checkbox"/> theliberallocblog.biz	\$8.99 SALE!	Save \$11.00/yr			
<input type="checkbox"/> theliberallocblog.mobi	\$7.99*	Save \$7.00/yr			
<input type="checkbox"/> theliberallocblog.us	\$9.99*/yr SALE!	SPECIAL!			
<input type="checkbox"/> theliberallocblog.biz	\$14.99*/yr				

No domains pending registration.

Search for another domain

Enter a domain name:

.com

Bob's tribute to the finest fighting force the world has ever known. Happy 234th birthday, Marines! "Bob, you are a marketing genius..." - John

Pricing includes over 50+ domains FREE extras.

General	Country/Region	Bulk	First Year Price	Availability
General Domain TLD Extensions				
.com	The most popular domain! Do you have yours?		\$2,000.00*	<input type="checkbox"/> Premium
.info	Put your information on the Web.		\$49.99 \$0.99*	<input type="checkbox"/> Available
.net	The perfect complement to a .COM.		\$49.99 \$9.99*	<input type="checkbox"/> Available
.org	Perfect for your non-profit.		\$14.99* \$6.99*	<input type="checkbox"/> Available
.me	A domain that's all about YOU.		\$49.99 \$6.99*	<input type="checkbox"/> Available
.mobi	Give customers on-the-go access to your site.		\$44.99 \$7.99*	<input type="checkbox"/> Available
.us	Get your hands on the all-American domain.		\$45.99 \$9.99	<input type="checkbox"/> Available
.biz	A domain that means business.		\$14.99*	<input type="checkbox"/> Available
.ws	An all-purpose Web Site Domain.		\$14.99	<input type="checkbox"/> Available
.asia	Reach the growing Asian market.		\$19.99*	<input type="checkbox"/> Available
.cc	There's only one domain for the Cocos Islands - .cc		\$19.99	<input type="checkbox"/> Available

*** Bulk pricing for multiple domains and local holidays

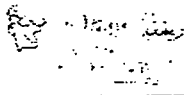
Help and Support
Telephone Support & Sales
Billing Support
Email Our Support Team
Frequently Asked Questions
User's Guides
Report Spam
Test Our Products

Account Manager
My Account
My Renewals
My Upgrades
Account Settings
Customer Information
Order History
Create Account

Shopping
Offer Disclaimers
Domain Search
Catalog
Product Advisor
View Shopping Cart
Gift Cards
Go Daddy Mobile

Resources
WHOIS search
ICANN Confirmation
Web Mail
Affiliates
Connect with Us
Gadgets/Widgets
Add browser domain search

About Go Daddy
Careers
Security Center
Company Info
News Center
Customer Testimonials
What's New
View our Commercials



- [Home](#)
- [About Us](#)
- [Marketplace](#)
- [Media](#)
- [Support & Community](#)
- [Bob's Video 2](#)

- [Domains](#)
- [Hosting](#)
- [Email](#)
- [Site Builders](#)
- [Business](#)
- [SSL Certificates](#)
- [Resellers](#)
- [Start Domain Search](#)

Add 6 more domains and [GET BULK PRIC](#)

[Search](#) | [Register](#) | [Customize](#) | [Checkout](#) | No domains pending registration.

LiberaLocBlog.com is available as a Premium Domain Name!

[click here for info](#)

This Premium Domain Name can be purchased for \$2,000.00*.

- [What is a Premium Domain Name?](#)
- For more information on this domain, call (480) 366-3343.

[Why register multiple dom](#)

[Select All](#)

[More Domain Options](#)

[We also recommend...](#)

- [liberalocblog.com](#)
- [liberalocblog.info](#)
- [liberalocblog.net](#)
- [liberalocblog.org](#)
- [liberalocblog.pro](#)
- [liberalocblog.mobi](#)
- [liberalocblog.us](#)
- [liberalocblog.biz](#)

- Premium Domain price \$2,000.00
- \$0.99* **BEST VALUE!**
- \$9.99* **SALE!** Save \$3.00/yr
- \$9.99* **SALE!** Save \$5.00/yr
- \$8.99 **SALE!** Save \$11.00/yr
- \$7.99*
- \$9.99/yr **SALE!** **SPECIAL!**
- \$14.99*/yr

- Additional Premium International**
- [Select All](#)
- [liberalocblogs.com](#)
- [liberalocblogs.site.com](#)
- [myliberalocblog.com](#)
- [liberalocblogonline.com](#)
- [newliberalocblog.com](#)
- [liberalocblogstore.com](#)
- [freeliberalocblog.com](#)

No domains pending registration.

Search for another domain

Enter a domain name:

.com

Bob's tribute to the finest fighting force the world has ever known. Happy 234th birthday, Marines! "Thank you for the powerful encouragement..." - Carlos

Pricing includes over 100+ TLDs or FREE extras.

General	Country/Region	Bulk	First Year Price	Availability
General Domain TLD Extensions				
.com	The most popular domain! Do you have yours?		\$2,000.00*	<input type="checkbox"/> Premium
.info	Put your information on the Web.		\$49.99* \$0.99*	<input type="checkbox"/> Available
.net	The perfect complement to a .COM.		\$49.99* \$9.99*	<input type="checkbox"/> Available
.org	Perfect for your non-profit.		\$14.99* \$9.99*	<input type="checkbox"/> Available
.me	A domain that's all about YOU.		\$49.99 \$6.99	<input type="checkbox"/> Available
.mobi	Give customers on-the-go access to your site.		\$49.99* \$7.99*	<input type="checkbox"/> Available
.us	Get your hands on the all-American domain.		\$49.99 \$9.99	<input type="checkbox"/> Available
.biz	A domain that means business.		\$14.99*	<input type="checkbox"/> Available
.ws	An all-purpose Web Site Domain.		\$14.99	<input type="checkbox"/> Available
.asia	Reach the growing Asian market.		\$19.99*	<input type="checkbox"/> Available
.cc	There's only one domain for the Cocos Islands - .cc		\$19.99	<input type="checkbox"/> Available

[Click here for important disclosures and legal policies](#)

Help and Support
 Telephone Support & Sales
 Billing Support
 Email Our Support Team
 Frequently Asked Questions
 User's Guides
 Report Spam
 Test Our Products

Account Manager
 My Account
 My Renewals
 My Upgrades
 Account Settings
 Customer Information
 Order History
 Create Account

Shopping
 Offer Disclaimers
 Domain Search
 Catalog
 Product Advisor
 View Shopping Cart
 Gift Cards
 Go Daddy Mobile

Resources
 WHOIS search
 ICANN Confirmation
 Web Mail
 Affiliates
 Connect with Us
 Gadgets/Widgets
 Add browser domain search

About Go Daddy
 Careers
 Security Center
 Company Info
 News Center
 Customer Testimonials
 What's New
 View our Commercials

1-800-368-6877 Sales & Support 24/7 800-368-6877

Create Account

Login to Account:

Username/Customer #

Password

USD

Home Auctions Marketplace Media Support & Community Some Tools

Domains Hosting Email Site Builders Business SSL Certificates Resellers Start Domain Search

Add 6 more domains and GET BULK PRICE!

Search Register Customize Checkout No domains pending registration.

ChrisLeahPrevAtt.com is available as a Premium Domain Name!

click here for info!

This Premium Domain Name can be purchased for \$1,000.00*.

- What is a Premium Domain Name?
For more information on this domain, call (480) 366-3343.

Why register multiple .com?

Sample

More Domain Options

We also recommend...

Table listing domain options for ChrisLeahPrevAtt.com, including Premium Domain price \$1,000.00, and various TLDs like .info, .net, .org, .biz, .us, .me, .mobi, .us, .biz, .me, .asia, .cc with their respective prices and savings.

No domains pending registration.

Search for another domain

Enter a domain name:

.com

Bob's tribute to the finest fighting force the world has ever known. Happy 234th birthday, Marines! "Thank you for the powerful encouragement..." - Carlos

Pricing includes over 200+ domains, FREE extras.

Table with 4 columns: General, Country/Region, Bulk, and First Year Price. Lists various domain TLDs like .com, .net, .org, .biz, .us, .me, .mobi, .us, .biz, .me, .asia, .cc and their corresponding prices.

Click here to learn about bulk rates and special pricing

Help and Support: Telephone Support & Sales, Billing Support, Email Our Support Team, Frequently Asked Questions, User's Guides, Report Spam, Test Our Products

Account Manager: My Account, My Renewals, My Upgrades, Account Settings, Customer Information, Order History, Create Account

Shopping: Offer Disclaimers, Domain Search, Catalog, Product Advisor, View Shopping Cart, Gift Cards, Go Daddy Mobile

Resources: WHOIS search, ICANN Confirmation, Web Mail, Affiliates, Connect with Us, Gadgets/Widgets, Add browser domain search

About Go Daddy: Careers, Security Center, Company Info, News Center, Customer Testimonials, What's New, View our Commercials

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EXHIBIT 6

Username/Customer # Password

[Create Account](#) | [Forgot Password](#) | [Sign Out](#) [Deals of the Day](#)

HOME

Domain Auctions

Marketplace

Support & Community

Domains

Hosting

Email

Site Builders

Business

SSL Certificates

Resellers

Get your domain in 4 easy steps!

Search

Register

Customize

Checkout

No d

Show All My Products

ClaudioGallegos.com is available as a Premium Domain Name

[\(click here for info\)](#)

This Premium Domain Name can be purchased for \$1,000.00*.

- [What is a Premium Domain Name?](#)
- For more information on this domain, call (480) 366-3343.

YOU can negotiate anything.
6 quick tips for doing it right.
Plus ... a Smoking Hot Blonde!
"Amazing ideas!" - Garrett K.

[Select All](#)

[More Domain Op](#)

<input checked="" type="checkbox"/>	claudiogallegos.com	Premium Domain price \$1,000.00*	
<input type="checkbox"/>	claudiogallegos.info	\$0.89*	BEST V.
<input type="checkbox"/>	claudiogallegos.net	\$9.99*/yr SALE!	Save \$3
<input type="checkbox"/>	claudiogallegos.org	\$14.99*/yr	
<input type="checkbox"/>	claudiogallegos.me	\$8.99 SALE!	Save \$1
<input type="checkbox"/>	claudiogallegos.mobi	\$7.99*	Save \$7
<input type="checkbox"/>	claudiogallegos.us	\$5.99 SALE!	SPECIA
<input type="checkbox"/>	claudiogallegos.biz	\$9.99* SALE!	Save \$5

No domains pending registration.

Search for another domain

Enter a domain name:

.....com

Pricing includes over Over \$100† in FREE extras.

General	Country/Region	Bulk
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General Domain TLD Extensions

[.com](#) The most popular domain! Do you have yours?

- .info** Put your information on the Web.
- .net** The perfect complement to a .COM.
- .org** Perfect for your non-profit.
- .me** A domain that's all about YOU.
- .mobi** Give customers on-the-go access to your site.
- .us** Get your hands on the all-American domain.
- .biz** A domain that means business.
- .ws** An all-purpose Web Site Domain.
- .asia** Reach the growing Asian market.
- .cc** There's only one domain for the Cocos Islands - .cc

*, **, ***, †, ††, ††† [Click here for product disclaimers and legal policies](#)

Sign up for special offers:

Account Manager
 My Account
 My Renewals
 My Upgrades
 Account Settings
 Customer Information
 Order History
 Create Account

Shopping
 * Offer Disclaimers
 Domain Search
 Product Catalog
 Product Advisor
 Gift Cards
 Go Daddy Mobile
 Today's Offers

Resources
 Webmail
 WHOIS search
 ICANN Confirmation
 Affiliates
 Connect with Us
 Gadgets/Widgets
 Site Map

Help and Support
 Telephone Support & Sales
 Billing Support
 Email Our Support Team
 Frequently Asked Questions
 User's Guides
 Report Spam
 Test Our Products

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GoDaddy.com is the world's No. 1 ICANN-accredited domain name registrar for .COM, .NET, .ORG, .INFO, .BIZ and .US

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EXHIBIT 7

Username/Customer # Password

[Create Account](#) | [Forgot Password](#) | [Sign Out](#) [Deals of the Day](#)

[HOME](#) [Domain Auctions](#) [Marketplace](#) [Support & Community](#)

[Domains](#) [Hosting](#) [Email](#) [Site Builders](#) [Business](#) [SSL Certificates](#) [Resellers](#)

Get your domain in 4 easy steps!

[Search](#) [Register](#) [Customize](#) [Checkout](#) [No d](#)

Show All My Products

RyanGeneTrabuco.com is available a [\(click here for info\)](#)

- This Premium Domain Name can be purchased for \$1,000.00*.
- [What is a Premium Domain Name?](#)
 - For more information on this domain, call (480) 366-3343.

YOU can negotiate anything.
6 quick tips for doing it right.
Plus ... a Smoking Hot Blonde!
 "Your videos are awesome!" - Jorge G.

[Select All](#)

[More Domain Op](#)

<input checked="" type="checkbox"/>	ryangenetrabuco.com	Premium Domain price \$1,0	
<input type="checkbox"/>	ryangenetrabuco.info	\$0.89*	BEST V.
<input type="checkbox"/>	ryangenetrabuco.net	\$9.99*/yr SALE!	Save \$3
<input type="checkbox"/>	ryangenetrabuco.org	\$14.99*/yr	
<input type="checkbox"/>	ryangenetrabuco.me	\$8.99 SALE!	Save \$1
<input type="checkbox"/>	ryangenetrabuco.mobi	\$7.99*	Save \$7
<input type="checkbox"/>	ryangenetrabuco.us	\$5.99 SALE!	SPECIA
<input type="checkbox"/>	ryangenetrabuco.biz	\$9.99* SALE!	Save \$5

No domains pending registration.

Search for another domain

Enter a domain name:

.....com

Pricing includes over Over \$100† in FREE extras.

[General](#) [Country/Region](#) [Bulk](#)

General Domain TLD Extensions

[.com](#) The most popular domain! Do you have yours?

