

ESTTA Tracking number: **ESTTA702870**

Filing date: **10/16/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	C-Byte Computer Systems LLC
Granted to Date of previous extension	10/17/2015
Address	185 Broadway Ave Alamosa, CO 81101 UNITED STATES

Correspondence information	C-Byte Computer Systems LLC 185 Broadway Ave Alamosa, CO 81101 UNITED STATES admin@c-byte.company Phone:800-641-3750
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Applicant Information

Application No	86571876	Publication date	08/18/2015
Opposition Filing Date	10/16/2015	Opposition Period Ends	10/17/2015
Applicant	Trevor Biscope 3565 Las Vegas Blvd South #148 Las Vegas, NV 89109 UNITED STATES		

Goods/Services Affected by Opposition

<p>Class 042. First Use: 1989/12/00 First Use In Commerce: 1989/12/00 All goods and services in the class are opposed, namely: Information technology consulting services; Consulting services in the design and implementation of computer-based information systems for businesses; Consulting services in the field of design, selection, implementation and use of computer hardware and software systems for others; Computer services, namely, providing virtual and non virtual application servers, web servers, file servers, co-location servers, load balancing servers, redundancy servers, media servers and database servers of variable capacity to third party computing and data storage facilities; Developing and hosting a server on a global computer network for the purpose of facilitating e-commerce via such a server; Technical support services, namely, migration of datacenter, server and database applications; Technical support services, namely, technical administration of servers for others and troubleshooting in the nature of diagnosing server problems; Computer programming services, namely, on-line transaction processing (OLTP) and decision support (DSS) applications</p>
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Grounds for Opposition

False suggestion of a connection	Trademark Act section 2(a)
Priority and likelihood of confusion	Trademark Act section 2(d)

Mark Cited by Opposer as Basis for Opposition

U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	c-byte.com		
Goods/Services	communication specifically computer hardware and software consultation, assembly web-design and system deployment and database design Serving: Guest facilities Lodges Hotels Motels Resorts Hospitals / Clinics Government administration		

Related Proceedings	Arbitration managed by National Arbitration Forum for Internet Corporation for Assigned Names and Numbers (ICANN)
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Attachments	<p>USPTO Notice of Opposition C-BYTE Oct 2015.pdf(161860 bytes)</p> <p>USPTO Exhibit Directory 2015.pdf(14785 bytes)</p> <p>USPTO Opposer Supplemental Exhibits 1-5.pdf(79841 bytes)</p> <p>USPTO Opposer C-BYTE Complaint Form - CDRP amended 10 02 15 B.pdf(457873 bytes)</p> <p>USPTO Opposer Exhibit UDRP_C-Byte 2015 10 2015.pdf(911455 bytes)</p> <p>USPTO Opposer UDRP C-BYTE CLUB EXHIBIT A- WHOIS REPORTS FOR DISPUTED DOMAINS.pdf(240308 bytes)</p> <p>USPTO Opposer's CentralNic policy.pdf(48805 bytes)</p> <p>USPTO Opposer's Rules for Uniform Domain Name Dispute Resolution Policy (the Rules).pdf(318780 bytes)</p> <p>USPTO Opposer's Supplemental Exhibit page 6 A-B.pdf(241540 bytes)</p> <p>USPTO Opposer's Uniform Domain Name Dispute Resolution Policy.pdf(174420 bytes)</p> <p>USPTO Opposer CDRP WEBMAIL CENTRALNIC MEDIATION A+ 3-7.pdf(282584 bytes)</p> <p>USPTO Opposer CDRP C-BYTE EXHIBIT A- WHOIS REPORT FOR DISPUTED DOMAINS.pdf(76145 bytes)</p> <p>USPTO Opposer CDRP C-BYTE EXHIBIT(S) B - D.pdf(1380995 bytes)</p> <p>USPTO Opposer CDRP C-BYTE EXHIBIT(S) H NUANs.pdf(1903405 bytes)</p> <p>USPTO Opposer_CDRP_C-BYTE EXHIBIT -S-.pdf(1341830 bytes)</p> <p>USPTO Opposer_CDRP_C-BYTE EXHIBIT -M-.pdf(652111 bytes)</p> <p>USPTO Opposer CDRP C-BYTE EXHIBIT(S) V & W.pdf(878323 bytes)</p> <p>USPTO Opposer CDRP C-BYTE EXHIBIT(S) T &U.pdf(924412 bytes)</p> <p>USPTO Opposer_CDRPC-BYTE EXHIBIT E 1310001523522.pdf(1612700 bytes)</p> <p>USPTO Opposer CDRP C-BYTE EXHIBIT(S) P & R.pdf(699718 bytes)</p> <p>USPTO Opposer CDRP C-BYTE -EXHIBIT -G- UDRP DECISION FA1405001562032.pdf(786938 bytes)</p> <p>USPTO Opposer CDRP C-BYTE EXHIBIT(S) N & O.pdf(733653 bytes)</p> <p>USPTO Opposer CDRP C-BYTE EXHIBIT(S) -J- ALBERTA MEP.pdf(695847 bytes)</p> <p>USPTO Opposer CDRP C-BYTE -EXHIBIT -L- LINKS TO VEGAS PORN INDUSTRY.pdf(1612591 bytes)</p> <p>USPTO Opposer CDRP C-BYTE EXHIBIT(S) K 1-4.pdf(644227 bytes)</p>
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Wanda Brink Manager/
Name	C-Byte Computer Systems LLC
Date	10/16/2015

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of trademark application Serial No.: 86571876

For the mark: C-BYTE

Published in the Official Gazette on: August 18th 2015

C-Byte Computer Systems LLC

v.

Trevor Biscope

NOTICE OF OPPOSITION

C-Byte Computer Systems LLC.,

1 Recorded with the Secretary of State Colorado February 5th 2013 who's address is;
2 185 Broadway Ave., Alamosa CO 81101,
3 with a mailing address of; PO Box 1896, Alamosa CO 81101.

4 The above-identified opposer believes that it, will be damaged by registration of the mark shown in
5 the above-identified application, and hereby opposes the same.

6 (2) The grounds for opposition are as follows:

7 i/ The Opposer has common law rights to the trademark "C-BYTE" as follows;

8 C-Byte Computer Systems LLC., as of 02/05/2013, is a registered single member
9 limited liability corporation formed under the laws of the state of Colorado United States of
10 America. Attached Colorado Secretary of State certificate of good standing (Exhibit C-page
11 1- C-Byte Computer Systems LLC Documentation) Vegas Brand Enterprises Inc is the
12 single member, of the limited liability corporation C-Byte Computer Systems LLC.
13 Attached Colorado Secretary of State certificate of good standing (Exhibit C-page 2 -) See
14 attached Certificate of Authority, C-Byte Computer Systems LLC (Exhibit C-page 4 -) The
15 physical office location of C-Byte Computer Systems LLC is 185 Broadway Ave Alamosa
16 CO 81101 see photos (Exhibit C-page 3 - C-Byte Computer Systems LLC Documentation)
17 The Opposer is the owner of c-byte domain(s) with following extensions including but not
18 limited to; c-byte.com, c-byte.net, c-byte.company, c-byte.equipment, c-byte.tech,
19 c-byte.news , c-byte.online c-byte.website, even c-byte.horse, just to name a few, (See the
20 attached domain list Exhibit C page 7) These "c-byte" domain(s) offer computer hardware
21 and computer software products and services to the public on the internet. (See the attached
22 Exhibit C page 5-6 and Exhibit Supplemental pages 1-4)

1 ii) The Applicant is not entitled to the “C-Byte” trademark because he is already aware
2 that it’s common law rights belong to C-Byte Computer Systems LLC. (Opposer)
3 In receiving the transfer of domain(s) c-byte.com and c-byte.net from the Applicant, on the
4 date of February 8th 2013, ANY and/or all of the prior rights the Applicant may have
5 claimed to the trademark ended. (See Exhibit –E- page 22 line 14 & Numbered Exhibits 5-7)
6 Ancillary, the Applicant relies on the Canadian registration of C-Byte Inc as, a first in use
7 date. In 2005 long before the transfer of domains to the Opposer, the corporation ceased to
8 exist in Canada. The Canadian NUANs system demonstrates the “C-Byte Inc” registered
9 1988 Dec. went “struck” June 2nd 2005. As per rules in the Federal Canadian registry it
10 cannot comeback the same. (See Exhibit -H- page 1 NUANs and letter from Applicant
11 Exhibit D page 3)

12 C-Byte Computer Systems LLC (Opposer) did not grant and/or approved a license(s), or
13 authorization, to the Applicant in any way shape or form. Therefore Applicant is not
14 authorized to represent and/or use in any media for any purpose, the Opposer’s trademark
15 “C-BYTE”

16 In harmony with the Opposer’s position are the following ;

- 17 v Two arbitrations, decisions aligned with Internet Corporation for Assigned Names
18 and Numbers ("ICANN") the contract policy for the registration of domain names.
 - 19 • See the following Arbitration decision(s): (Exhibits E and G respectively.)
20 UDRP 1# FA1310001523522 and UDRP 2 # FA1405001562032
- 21 Additionally included: ICANN Policy , Rules and Forum (NAF) Supplemental Rules
- 22 v Two lawsuits | Montana District Court and Nevada Federal Court.
 - 23 • Nevada and Montana Lawsuit (Exhibit –K- pages 1-4)

24 Further the Applicant registered two business with the state of Nevada, in May 2014 using
25 names, similar to the Opposer business identity, by means of an United Parcel Service
26 address. This action does not acquire senior rights to the trademark “C-BYTE” .
27 (See Exhibit D- pages 1 to 3)

28 iii/ Third and most important “Identity theft” does not attain rights.

29
30 The Applicant is the same individual that;

- 31 a) shortly after employment ended, hi-jacked the domains c-byte.com and c-byte.net.
32 (See UDRP 1# FA1310001523522 Exhibit-E- page 24 line 14 and 26 lines 22-30)
- 33 b) before the process for dealing with the hijacking was completed, and while he had use
34 of the hi-jacked websites , the green bar security certificate that the Opposer had
35 purchased was display. Therefore deliberately misleading the public as to the true identity
36 of the website.
37 (See UDRP 1# FA1310001523522 Exhibit- E- page 26 line 8-19)

- 1 c) offered online gambling registration knowing that it was illegal in the state of Colorado
2 for a computer hardware and software company to be involved with any online gambling
3 activity. (See UDRP I# FA1310001523522 - Exhibit –E- page 25 line 1 and
4 Exhibit –U- gambling)
- 5 d) *has a rule or ruin agenda* toward the Opposer, as evidenced by the scurrilous bizarre
6 email attacks, clearly designed to bully and discredit the Opposer’s Officer.
7 (See Exhibits N & P) (See UDRP I# FA1310001523522 - Exhibit –E- page 25 line 17)
- 8 e) *is three times plus offender that has defiantly continued to register more c-byte domain*
9 *extensions and is now part of a third UDRP and fourth CDRP in progress.*
10 (See Exhibit(s) CDRP#FA1510001640318 | UDRP#FA1509001639954
11 and accompanying evidence.)
- 12 f) *is aware by now, simply that of changing the domain extension OR MAKING A SLIGHT*
13 *DIFFERENCE to the registration name causes confusion regarding the business*
14 *name/brand/mark. With certainty, knows how internet search algorithms function and how*
15 *domains resolve to their respective websites. The Applicant is intentional and deliberate,*
16 *in causing confusion, offering similar if not the same products and services.*
17 Insolent, the Applicant does flaunt the breach of ICANN policy, by once again on
18 10/14/2015 registering 187799c-byte.com.(See Exhibit- Supplemental 6 A-B)
19 The Applicant cannot claim ignorance of infringement when intentionally smashing
20 through the rules of domain name registration (See ICANN RULES) and USPTO
21 registrations FOR VEGAS Exhibit –S- where the USPTO outlines the trademark process
22 to avoid registering trademarks that may have established / or registered marks)
- 23 g) *is Canadian.* The physical address in United States he is using is United Parcel Service
24 address. The company he is using is registered in Nevada (May 23, 2014) and uses the
25 same parcel service for small business address. (See Exhibit- D – pages 1-3)See Alberta
26 MEP Exhibit and Montana MEP Exhibit –J- 1-4)
- 27 h) *has applied for this trademark and others as a US citizen.* The Opposer, cannot fathom
28 how the Applicant has obtained Citizenship in the time between lawsuits and filing for the
29 trademark at issue here. Notice the lawsuit decision (Montana) references a Canadian
30 law firm’s mailing address. The actual address used to send the case to Kalispell Montana
31 court was Leffler Law, Office Box 1873, 862 — 3rd Ave. Fernie, BC V0B 1M0.
32 (See Exhibit –K- pages 4)

1 i) *is asking the public to believe* that between that date of April 16th 2014 and the USPTO
2 filing date of March 20/2015 that US immigration and Naturalization happened for the
3 Applicant? Since the Applicant is not allowed a Canadian Passport due to failure to
4 maintain payments to the Alberta MEP program, how would the applicant achieve
5 citizenship? If it would not be on the scale of impossible then it is more likely and highly
6 improbable that the Applicant became a US citizen overnight. (See Exhibits -J-1-4 and
7 compare -K- page 4 and Supplemental Page 5 Passport)

8 j) *is the same person, [Trevor Biscope] in the following;*

9 Federal Trade Commission the number is 47862294 regarding identity theft.

10 This is currently on going.

11 o in an FBI IC3 complaint # I1308191142508922 filed August 19th, 2013. and updated.

12 o in a complaint to the United State Postal Service (See Exhibit(s) -W- pages 1-2)

13 o as referenced in USPTO phone in complaint ref # 346853098

14 o **THE EXHIBITS annexed** are copies supplied to the latest arbitration to show that
15 this is a pattern with the Applicant; CDRP#FA1510001640318 |

16 UDRP#FA1509001639954 are waiting on the arbitration process to complete.

17 ALL exhibits are evidence that the USPTO application for C-BYTE is another
18 means to an end for the Applicant's continued harassment and rule or ruin agenda
19 to-date.

20 (3) In light of the foregoing, the Opposer respectfully requests that the application made
21 by Trevor Biscope on March 20th 2015, for the above mark "C-BYTE " therefore
22 be -DENIED--.

23 (4) The Opposer, *certifies* that the information contained in this NOTICE OF OPPOSITION is
24 to the best of their knowledge, complete and accurate, that this is not being presented for any
25 improper purpose, such as to harass, and that the assertions in this notice are warranted under
26 applicable law, as it now exists or as it may be extended by a good-faith and reasonable
27 argument.

By Wanda Brint Manager Date Oct 15/15
(Signature | Position) Date



CONTENT DIRECTORY for USPTO Notice of Opposition

<i>Item description</i>	<i>found on Notice of Opposition Page(s)</i>	<i>Exhibit</i>	<i>Page(s)</i>
WHOIS REPORTS FOR DISPUTED DOMAINS	See UDRP CDRP	A	1-14
RESPONDENT USPTO APPLICATION	See UDRP CDRP	B	1-4
C-BYTE COMPUTER SYSTEMS LLC DOCUMENTATION	1	C	1-7
RESPONDENT COMPANY DOCUMENTATION (NEVADA)	2-3	D	1-3
UDRP DECISION FA1310001523522	2-3	E	1-28
UDRP DECISION FA1405001562032	2	G	1-11
CANADA NUANS REPORT C-BYTE	2	H	1-12
ALBERTA AND MONTANA (MEP)	3-4	J	1-4
COURT DECISIONS	2-3	K	1-4
LINKS TO VEGAS PORN INDUSTRY	See UDRP CDRP	L	1-9
USPTO VEGAS.COM	See UDRP CDRP	M	1-9
GROTESQUE EMAILS 1	3	N	1-7
VEGAS .IM SCREENSHOT	See UDRP CDRP	O	1
GROTESQUE EMAILS 2	3	P	1-6
USPTO C-BYTE OPPOSER	See UDRP CDRP	R	1-3
TRADEMARK APPLICATIONS -VEGAS	3	S	1-17
RESPONDENTS VEGAS CONNECTIONS	See UDRP CDRP	T	1-7
COLORADO GAMBLING LAWS (ONLINE)	3 line 4	U	1-8
ALBERTA UN-AUTHORIZED CONNECTION TO C-BYTE	See UDRP CDRP	V	1-2
OTHER LEGAL FILINGS	4	W	12
SUPPLEMENTAL EXHIBIT PAGES 1-5	1 and 4		5
NUMBERED EXHIBITS 5-7	2 line 5		14
SUPPLEMENT NUMBERED EXHIBITS 6 A-B	3 line 18		2

Other Attachments

UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY

CENTRALNIC DISPUTE RESOLUTION POLICY

ICANN RULES FOR UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY (THE "RULES")

FORUM SUPPLEMENTAL RULES TO ICANN'S UNIFORM DOMAIN

Workspace Webmail :: Print

https://email05.secureserver.net/view_print_multi.php?uidArray...

Wanda Brink, Manager
185 Broadway Avenue
Alamosa
Colorado
81101
US
Phone: +1.7195875545
Email Address: alamosa@c-byte.com

BILLING CONTACT INFO
C-Byte Computer Systems LLC
Wanda Brink, Manager
185 Broadway Avenue
Alamosa
Colorado
81101
US
Phone: +1.7195875545
Email Address: alamosa@c-byte.com

Timestamp: 1360278682.1743

The Data in the Name.com LLC WHOIS database is provided by Name.com LLC for information purposes, and to assist persons in obtaining information about or related to a domain name registration record. Name.com LLC does not guarantee its accuracy. By submitting a WHOIS query, you agree that you will use this Data only for lawful purposes and that, under no circumstances will you use this Data to: (1) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via e-mail (spam); or (2) enable high volume, automated, electronic processes that apply to Name.com LLC (or its systems). Name.com LLC reserves the right to modify these terms at any time. By submitting this query, you agree to abide by this policy.

Cached on: 2013-02-07T16:11:22-07:00

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Computer Parts Inc (Colorado)

[Log In](#) | [Forgot Password?](#) | [Create Account](#)

USD [Cart \(empty\)](#)

24/7 Sales & Support (719) 587-5545

[Home](#) | [ICANN](#) | [My Account](#) | [Back to CPI](#) | [FAQ](#)

WHOIS Domain Check

[DOMAIN NAMES](#) | [WEB HOSTING](#) | [SSL & SECURITY](#) | [EMAIL ACCOUNTS](#) | [MARKETING TOOLS](#) | [BUILD A WEBSITE](#)

WHOIS search results for:

C-BYTE.COM

(Registered)

Is this your domain?

Add hosting, email and more.

Domain Name: C-BYTE.COM
 Registry Domain ID: 76751972_DOMAIN_COM-VRSN
 Registrar WHOIS Server: whois.wildwestdomains.com
 Registrar URL: http://www.wildwestdomains.com
 Update Date: 2014-09-29T13:41:22Z
 Creation Date: 2001-09-01T21:32:34Z
 Registrar Registration Expiration Date: 2022-09-01T21:32:34Z
 Registrar: Wild West Domains, LLC
 Registrar IANA ID: 440
 Registrar Abuse Contact Email: abuse@wildwestdomains.com
 Registrar Abuse Contact Phone: +1.4806242505
 Reseller: Computer Parts Inc (Colorado)
 Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited
 Domain Status: clientUpdateProhibited http://www.icann.org/epp#clientUpdateProhibited
 Domain Status: clientRenewProhibited http://www.icann.org/epp#clientRenewProhibited
 Domain Status: clientDeleteProhibited http://www.icann.org/epp#clientDeleteProhibited
 Registry Registrant ID:
 Registrant Name: Wanda Brink Manager
 Registrant Organization: C-Byte Computer Systems LLC
 Registrant Street: PO Box 1896 185 Broadway Ave
 Registrant City: Alamosa
 Registrant State/Province: Colorado
 Registrant Postal Code: 81101
 Registrant Country: United States
 Registrant Phone: +1.7195875545
 Registrant Phone Ext:
 Registrant Fax: +1.8886413750
 Registrant Fax Ext:
 Registrant Email: admin@c-byte.us
 Registry Admin ID:
 Admin Name: Wanda Brink Manager
 Admin Organization: C-Byte Computer Systems LLC
 Admin Street: PO Box 1896 185 Broadway Ave
 Admin City: Alamosa
 Admin State/Province: Colorado
 Admin Postal Code: 81101
 Admin Country: United States
 Admin Phone: +1.7195875545
 Admin Phone Ext:
 Admin Fax: +1.8886413750
 Admin Fax Ext:
 Admin Email: admin@c-byte.us
 Registry Tech ID:
 Tech Name: Domain Support
 Tech Organization: Computer Parts Inc (Colorado)
 Tech Street: 185 Broadway Ave
 Tech City: Alamosa
 Tech State/Province: Colorado
 Tech Postal Code: 81101
 Tech Country: United States
 Tech Phone: +1.7195875545
 Tech Phone Ext:
 Tech Fax: +1.8006413750
 Tech Fax Ext:
 Tech Email: support@cpi-ebiz.info
 Name Server: NS65.DOMAINCONTROL.COM
 Name Server: NS66.DOMAINCONTROL.COM
 DNSSEC: unsigned
 URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
 >>> Last update of WHOIS database: 2015-10-16T20:00:00Z <<<

For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

The data contained in this Registrar's WHOIS database, while believed by the registrar to be reliable, is provided "as is" with no guarantee or warranties regarding its accuracy. This

Domain already taken?

Enter Domain Name

NameMatch Recommendations

Computer Parts Inc (Colorado) NameMatch has found similar domain names related to your search. Registering multiple domain names may help protect your online brand and enable you to capture more Web traffic, which you can then direct to your primary domain.

Domains available for new registration:

Alternate domains	
<input type="checkbox"/> c-byte.software	\$39.99
<input type="checkbox"/> c-byte.design	\$69.99
<input type="checkbox"/> cbytes.co	\$29.99
<input type="checkbox"/> c-byte.rock	\$14.99
<input type="checkbox"/> c-byte.life	\$39.99
<input type="checkbox"/> c-byte.today	\$24.99
<input type="checkbox"/> cbyte.guru	\$39.99
<input type="checkbox"/> cbyte.technology	\$24.99

[ADD TO CART](#)

Learn more about

- [Private Registration](#) ? [Deluxe Registration](#) ?
- [Business Registration](#) ? [Protected Registration](#) ?

*Plus ICANN fee of \$0.18 per domain name year.

https://who.secureserver.net/whoisstd.as...

Page 2 of 2

information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written permission of this registrar. By submitting an inquiry, you agree to these terms of usage and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes.

Please note: the registrant of the domain name is specified in the "registrant" section. In most cases, the Registrar is not the registrant of domain names listed in this database.

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Search for another domain name in the **WHOIS** database

Enter a domain name to search

Search

[Store Home](#) | [Catalog](#) | [Shopping Cart](#) | [My Account](#) | [FAQ](#) | [Support](#) | [WHOIS](#) | [Legal Agreements](#) | [Bookmark This Site](#) | [Mobile Site](#)

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Maintenance Enforcement Program

Federal Licence Denials

A federal licence denial is one of the collection tools the Maintenance Enforcement Program (MEP) uses to encourage maintenance payments when debtors are in arrears.

When debtors fail to make payments in full for three payment periods, or have accumulated arrears of \$3,000 or more, MEP may apply to the federal government to deny certain federally issued licences, including passports and aviation and marine licences.

Before issuing a federal licence denial, MEP sends a notification letter to the debtor's address. This letter warns of a pending licence denial and requests that debtors contact MEP to make payment arrangements. From the date the notification is mailed, debtors are given 40 days to respond. If debtors contact MEP and make reasonable payment arrangements, federal licence denials are not completed. However, if no response is received within 40 days, MEP initiates action to deny federal licences.

If debtors hold a Canadian passport or other federal licence, the appropriate federal department suspends the passport or licence and refuses to renew it. That federal department then sends debtors notification of the action taken. If debtors are not current passport or licence holders, their names are placed on a control list to prevent future passports or licences from being issued to them. This control remains in effect until MEP requests that it be terminated.

It is an offence for people notified of a passport suspension to use that passport or fail to return it to a passport office. This offence carries a fine of \$5,000 or imprisonment for six months, or both. Federal RCMP conduct investigations to recover unreturned passports.

If debtors contact MEP and make satisfactory payment arrangements, MEP applies to have federal licence denials terminated. It may take up to 14 days for MEP to initiate removal of denials.

For additional information on federal licence denials, you may wish to access the Justice Canada website at www.canada.justice.gc.ca. This action is authorized by part three of *Family Orders and Agreement Enforcement Assistance Act*.

This document is part of a series of MEP information sheets that can be obtained in the following ways:

- MEP's website at www.albertamep.gov.ab.ca
- MEP's fax-on-demand service on the *MEP Info Line* by calling 780-422-5555 and using the catalogue number of the information sheet you wish to request

* **Toll-free** service to all Government of Alberta phone numbers is available from anywhere in Alberta by calling 310-0000 and following the voice prompts



C-Byte Computer Systems LLC
185 Broadway Ave.,
Alamosa, Colorado 81101
(Complainant)

v.
Domain Administrator/C Byte Company Inc.
Licensee: (C-Byte™) C-Byte Company, Inc.,
Chief Legal Officer.,
3565 Las Vegas Blvd South 148
LAS VEGAS, NV 89109
(Respondent)

**Domain Name(s)
in Dispute:**

c-byte.us.com

**COMPLAINT IN ACCORDANCE WITH
THE CENTRALNIC DISPUTE RESOLUTION POLICY**

1 [1.] This Complaint is hereby submitted for decision in accordance with the CentralNic Dispute
2 Resolution Policy (“Policy”) and Rules (“Rules”) and the FORUM’s (FORUM) Supplemental Rules
3 (“Supp. Rules”). Rule 3(b)(i).

4 [2.] **MEDIATION CERTIFICATION**

5 *The undersigned hereby certifies that a CentralNic Mediation was conducted between the parties and*
6 *has concluded/been terminated. (See EXHIBIT A + page 3 CentralNic email confirmation.)*
7 Rules 3(a), 3(b)(ii).

8 [3.] **COMPLAINANT INFORMATION**

- [a.] Name: C-byte Computer Systems LLC
- [b.] Address: 185 Broadway Ave., Alamosa, CO 81101
- [c.] Telephone: 800-641-3750
- [d.] Fax: 719-696-6055
- [e.] E-Mail: admin@c-byte.us

9 [4.] **COMPLAINANT AUTHORIZED REPRESENTATIVE, IF ANY**

- 10 [a.] Name: **Wanda Brink, Manager**
- 11 [b.] Address: **PO Box 1896 Alamosa CO 81101**
- 12 [c.] Telephone: **719-480-3932**
- 13 [d.] Fax: **719-696-6055**
- 14 [e.] E-Mail: **admin@c-byte.com**

15 *Rule 3(b)(iii).*

1 Complainant's preferred contact person for correspondence relating to this case: Rule 3(b)(iv).

2 [a.] Contact Name(s): Wand a Brink , Manager

3 [b.] Contact Emails(s): admin@c-byte.us | admin@c-byte.company

4

5 [5.] RESPONDENT INFORMATION—Registrant from the Whois Record

6

7 [a.] Name: Domain Administrator/ C Byte Company Inc

8 [b.] Address: Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Officer,, 3565 Las Vegas

9 Blvd South 148

10 LAS VEGAS, NV89109

11 [c.] Telephone: +1.4037707818

12 [d.] Fax:

13 [e.] E-Mail: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net

14

15 [6.] RESPONDENT AUTHORIZED REPRESENTATIVE, IF KNOWN

16 NOT KNOWN

17 Rule 3(b)(vi).

18

19 [7.] ANY ADDITIONAL CONTACT INFORMATION FOR RESPONDENT

20 [a.] Name: Trevor Biscope

21 [b.] Address: (VEGAS™) Vegas License International LLC, c/o Chief Legal Officer

22 3565 Las Vegas Blvd South 148, LAS VEGAS, NV 89109

23 [c.] Telephone: +1.7027202300

24 [d.] Fax:

25 [e.] E-Mail: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net

26 [f.] Admin Name: Trevor Biscope

27 (See EXHIBIT A page -1- WHOIS C-BYTE.US.COM.)

28 Rule 3(b)(vi).

29 [8.] DOMAIN NAMES

30 c-byte.us.com

31 Rule 3(b)(vii).

1 [9.] REGISTRAR INFORMATION

- 2 [i.] Registrar's Name: GANDI SAS
3 [ii.] Registrar Address: 63-65 Boulevard Massena
4 75013 Paris France
5 [iii.] Telephone Number: +33.143737851
6 [iv.] E-Mail Address: legal@support.gandi.net
7

8 *Rule 3(b)(viii).*

9 [10.] PANEL SELECTION

10 Complainant elects to have this dispute heard by a:

11 X single member panel | *Rule 3(b)(v)*
12

13 [11.] TRADEMARKS IN DISPUTE

14 The Complainant owns 26 domains associated with the mark “c-byte” in an attempt to
15 insulate itself, from identity theft and be better positioned in related internet searches.

16 Domains c-byte.com c-byte.net, c-bytecomputersystems.com, c-byte.company c-byte.systems,
17 c-byte.solutions, just to name a few, are registered to the Complainant. (*Exhibit C-page -7- C-Byte*
18 *Computer Systems LLC Documentation*)

19 C-Byte Computer Systems LLC (Complainant) is a registered single member limited liability
20 corporation formed under the laws of the state of Colorado United States of America. Attached
21 Colorado Secretary of State certificate of good standing (*Exhibit C-page 1-*)

22 Vegas Brand Enterprises Inc., is the single member of the limited liability corporation C-Byte
23 Computer Systems LLC. Attached Colorado Secretary of State certificate of good standing (*Exhibit*
24 *C-page 2 -*) See attached Certificate of Authority,

25 C-Byte Computer Systems LLC (*Exhibit C-page 4 -*). The physical office location of C-Byte
26 Computer Systems LLC is 185 Broadway Ave Alamosa CO 81101 see photos;
27 (*Exhibit C-page 3 -*) Rule 3(b)(ix).
28

29 [12.] DESCRIPTION OF THE DISPUTE Rule 3(b)(x).

30
31 *The Complainant* is entitled to relief under Policy Para. 4., based on the following
32 statement of the grounds upon which the CDRP Complaint is based;

33 **[a.] Domains at issue are identical and/or confusingly similar;**

34 **i) The Trademark “c-byte” is known to the Respondent.**

35 After the first UDRP(Panel) returned the hi-jacked domains to the Complainant and
36 while waiting on the Montana court to decide a lawsuit, regarding the mark “c-byte”
37 the Respondent registered “c-byte.us.com” Dec 5th 2013. (*See Exhibit A page 1 date*)

38 Consequently, the Montana case was decided the following April (*See Exhibit-K- page 4*)

1 During the implementation phase of the UDRP after the Montana court ruling, the Respondent
2 registered more c-byte domains. Then the other UDRP and other court case in Nevada were not
3 finished until this past March 2015 (See Exhibit-K- page 2)

4 This history shows that the Complainant, C-Byte Computer Systems LLC and the Respondent are
5 the same in two prior Uniform Domain Name Dispute Resolution Policy (UDRP) arbitration cases in
6 2 years and two lawsuits. This demonstrates Respondent prior knowledge of the name/brand/mark,
7 and “how” ICANN policy and rules function to administer trademark standards in connection to
8 domain registration(s).

9 **ii) C-BYTE by any domain extension is still “c-byte”.** Complainant domain(s) are the same or
10 similar to the disputed domains registered by the Respondent. (Exhibit C-page -7- C-Byte Computer
11 Systems LLC Documentation)

12 **iii) The Respondent is certainly aware by now,** that simply changing the domain extension OR
13 MAKING A SLIGHT DIFFERENCE to the registration name causes confusion regarding the business
14 name/brand/mark. With certainty, knows how internet search algorithms function and how domains
15 resolve to their respective websites. The Respondent is intentional and deliberate, in causing
16 confusion, offering similar if not the same products and services.

17 **iv) Respondent is a three times offender and more.** The first UDRP process shows that the same
18 Respondent, hi-jacked the domain c-byte.com (Register.com) and used the email system to hi-jack
19 c-byte.net at Name.com LLC . As well, the Respondent registered
20 c-bytecomputersystems.com with GANDI SAS and that is a direct copy of the Complainant’s name.
21 (See Exhibit -E- UDRP #FA1310001523522 and (See Exhibit -G- UDRP #FA1405001562032)

22
23 **[b.] i) No rights;**

24 **The Respondent Trevor Biscope, Canadian,** a former employee, does NOT have permission or
25 authorization from C-Byte Computer Systems LLC., to use or represent “c-byte” products or
26 services in any way shape or form, publicly or privately in Canada or United States. (See Exhibit –
27 V- Alberta Un-Authorized Connection To C-Byte)

28 **Note: The Respondent,** Mr. Biscope, at the time employment terminated, in July of 2013 had a
29 Canadian address (Alberta) and phone number (Alberta). (See Exhibit –J- Alberta And Montana
30 (MEP) Maintenance Enforcement Program)

31 **ii) or legitimate interest;**

32 The Respondent’s vow to get “even” is demonstrated in the **continued use of “c-byte”**. Since the
33 “rule or ruin” agenda advanced by the Respondent began with the first hijacking of
34 c-byte.com, the Complainant has looked to ICANN policy, for relief.

35 Meantime, the Respondent registers another “c-byte” domain extension, then files a “frivolous”
36 lawsuit, and in doing so, has managed deliberately and defiantly to be “c-byte” on the internet.
37 Respondent’s sham ventures, continues to be a drag on and detrimental to conducting the normal
38 business of the Complainant. In knowingly registering these domains the Respondent is seeking to
39 cause legal and financial injury, as well as capitalize on the Complainant’s trademark “c-byte”
40 internet traffic.

1 Clearly this makes obvious, the Respondent's rule or ruin agenda.

Additionally; the term "frivolous lawsuit" is NOT used lightly in this context, consider this, among other legal matters; (See Exhibit-K-Court Decisions)

2 ► the Respondent fails to file a "reply" to his own law suit in Montana (Page-4-line 8 of Exhibit-K-)

3 ► uses jumbled language, cites no applicable law, in US Federal Court (Page-2-line 2 & 3 of Exhibit-K-)

4 ► filing a "motion" in US Federal Court without an underlying "complaint, (Page-1-line 25- of Exhibit-K-)

5 ► includes the Arbitration Panelist and NAF as Defendants . (Page-1- line 17 & 18 of Exhibit-K-)

6 **Please Note;** the date on domain registration is within days of the Respondent's lawsuit dismissal in Montana dated April 16th, 2014 (Compare Exhibit K and Exhibit -G- UDRP # FA1405001562032) and the 2015 registrations are within days of the US District court decision. March 16, 2015 (Compare Exhibit-K- with Exhibit-T- Respondents Vegas Connection)

7 **iii) The Respondent's uses** the Complainant's mark on gaming/gambling and adult online activities where the Complainant's mark C-BYTE is clearly present. New screenshots of Google and Bing searches show how the practice of confusion and deception continues. (See Exhibit -L- Links To Vegas Porn Industry)

8 **[c.] Registered in Bad Faith**

9 **i)** The Respondent reveals the maliciousness bullying, of this harassment through really bizarre scurrilous emails. This is proof that this activity on the part of the Respondent is meant to be disturbing and willfully destructive in nature. (See bizarre emails Exhibit -N- Grotesque Emails 1) The email message(s) from the Respondent, using threatening and gloating behavior provide proof that this conduct is no accident. (See bizarre emails Exhibit -P- Grotesque Emails 2) Some of these email use the c-byte.us.com domain.

10 **ii) The Respondent, registers with Nevada's** Secretary of State, in May 2014, an "LLC" and a "Corporation", that deliberately includes the names of the Complainant companies that are registered in Colorado in 2012 and 2013 respectively. (Compare Exhibit -C- with Exhibit-D- noting dates - Colorado filing is Feb 2013 and Nevada is May 2014)

11 **iii) The Respondent on March 20th 2015 applies for "C-BYTE"** trademark with the United States Patent and Trademark Office ("USPTO") and begins to display 1989, as a first use date, on the disputed domain's websites. Since the March 20th 2015 filing, the Complainant was advised that the USPTO application process had begun, so filed for an extension to prepare to oppose the continued theft of "c-byte". The Respondent, in planning this end run of due process, tries cleverly, to use the USPTO not only to harass the Complainant, but to continue identity theft. Applying to the USPTO as a US citizen, is also bizarre as he was an "undocumented" Canadian in 2013, or so the Complainant was led to believe. **Note:** The attached exhibit shows "C-Byte Inc" in Canada was dissolved (struck) in 2005 and cannot be used again (See Exhibit -H- Canada NUAN's Report C-Byte) (See Exhibit -B- USPTO APPLICATION C-BYTE)

1 **iv) The Respondent also applied March 20, 2015** to register trademarks; Vegas.XXX Vegas.PORN
2 Vegas.SEX Vegas.ADULT respectively using an address that is shared with United Parcel Service
3 for small business, in Las Vegas, Nevada. “VEGAS” is not part of this UDRP complaint. Nor does its
4 inclusion, purport to navigate the complexities of the Respondent’s gambling and/or registration of
5 “VEGAS” domain(s). The Complainant felt it necessary to include the USPTO VEGAS application
6 and latest Office action as evidence, in order to demonstrate the Respondent’s doggedness in being
7 considered part of the gambling and porn industry based in the state of Nevada. The Respondent has
8 registered VEGAS with 2 of these extensions as well as different country extensions.
9 Secondly, this evidence is included to show that the disputed domain’s “c-byte” whois data, share
10 the Respondent’s trademark insignia in the Registrant Address section and the same physical
11 address as the Respondent’s Vegas domain registrations. Accordingly, the website that the domain
12 “VEGAS.im” resolves to, removes any doubt that the Respondent is among other things, actually
13 involved in hosting and promoting gambling. (Isle of Mann). (See Exhibit –O- Vegas.IM offshore
14 gaming/gambling site. and See Exhibit –L- Links To Vegas Porn Industry) and (See Exhibit-T-
15 Respondent’s Vegas Connections) and (See Exhibit –L- on page 4 Displaying C-BYTE on Vegas
16 websites)

17 **v) The “VEGAS.COM” trademark registration(s)** are held by Vegas.com, LLC,
18 3rd floor Corporate Circle Dr., Henderson, Nevada 89074. VEGAS.COM USPTO serial # 78656203)
19 .(See Exhibit -M- USPTO Vegas.Com)

20 **vi) To a greater extent**, now with a Nevada address (2014-15), and then a Montana address (in
21 2013), the Respondent, Mr. Biscope is using C-Byte domain(s) to point traffic to Vegas endeavors.
22 This intentionally leads the public to believe that the Complainant allows or approves the use of
23 “Vegas” and agrees with the activities that the Respondent is offering, when in reality nothing could
24 be farther from the truth. Vegas is an established brand with separate organization and interests
25 from the Complainant.
26 The Complainant is a computer hardware and software company offering service to the hospitality
27 industry and is NOT at all in the entertainment or travel industry in competition with anything Las
28 Vegas, Nevada USA. ,(See Exhibit –C- page-7 and pages -5-6 offering bona fide services and
29 products)

30 **vii) The inappropriate use of the disputed domains** by the Respondent, not only tarnishes the
31 Complainant’s image, it implicates the Complainant in illegal activity. Whether or not, fully
32 regulated and/or allowed in some countries, online gambling remains illegal in Colorado.
33 Succinctly put, the Colorado, Attorney General’s office offers grounds for rejecting online gambling
34 and outlines that computer companies shall not engage in operating websites that offer this activity.
35 The Respondent had this information as an employee, and from the last two UDRP processes.
36 Again, for emphasis, the Respondent’s adult entertainment and gambling domains share the SAME
37 physical postal address that is used by the “c-byte.us.com” domain, that is listed as part of this
38 complaint. (See Exhibit –U- pages 1-8 Colorado Online gambling)
39 and (See Exhibit –S- 1-17 pages... more particularly page -4- of USPTO response to the
40 Respondents Vegas trademark application(s) a clear outline of ICANN trademark policy)

1 [d] **Luring business away**
 2 The Respondent is NOT making a legitimate noncommercial or fair use of the domain
 3 name(s) , *and the intent for commercial gain is very clear.* The Respondent is offering
 4 computer hardware/software services in competition with the Complainant by using
 5 “c-byte” knowingly, to lure business away. (See Exhibit –V- Alberta Un-Authorized
 6 Connection To C-Byte)
 7 **TWO UDRP’s and a THIRD and now a CDRP** with the same Respondent ,
 8 **UNEQUIVOCALLY** demonstrates bad faith, and repeat offenses.

9 [13.] **EVIDENCE** Rule 3(b)(xvi), Supp Rule 4 and the Annex to the Supplemental Rules.

10
 11 Attached evidence is the same as UDRP c-byte.club as it is the same Complainant and the
 12 same Respondent and the same history . (See CDRP Exhibit Directory)

13
 14 [14.] **REMEDY SOUGHT**

15 *The Complainant respectfully requests that the Panel issue a decision that the domain-name*
 16 *as follow; c-byte.us.com*
 17 *with registration at Registrar, Gandi SAS be: ----TRANSFERRED----- to the Complainant.*
 18 Rule 3(b)(xi).

19
 20 [15.] **OTHER LEGAL PROCEEDINGS** Rule 3(b)(xii).

21
 22 *Due to business and personal identity theft, spam and threats posed by the Respondent;*
 23 **1/ Monday following** the first domain hijacking *(August 19th, 2013)* a complaint was filed
 24 Federal Bureau (FBI) cyber crime unit (IC3) the number is **I1308191142508922**)
 25 Currently updated to include the latest attempts at blackmail and extortion.

26
 27 **2/ Following the above,** also filed a complaint with the Federal Trade Commission the
 28 number is **47862294** This is currently on going.

29
 30 **3/ Filed a complaint with Homeland security** and the Post Office as illegal gaming and
 31 illegal auctions often use the postal service. (See Exhibit(s) -W- pages 1-2 | Other Legal)

32
 33 **4/ UDRP** complaint filing regarding the 6 domains including “c-byte.club”; (contains the
 34 same exhibits as it is the same mark) This, CDRP complaint regarding the domain “c-
 35 byte.us.com”; after request for 10 day CentralNic mediation process has ended
 36 as notice received September 2/2015.

37
 38 **5/ September 16,2015** Opposer to the Respondent’s USPTO application for “ C-BYTE”
 39 USPTO serial number **86571876** (See Exhibit –R- USPTO C-BYTE Opposer)

1 [16.] COMPLAINT TRANSMISSION

2
3 A copy of the complaint, together with the Complaint Transmittal Coversheet as specified in the
4 Supplemental Rules, has been sent or transmitted to the Respondent (Domain Name holder) in
5 accordance with Paragraph 2(b), CentralNic and to the concerned Registrar. Rule 3(b)(xiii)
6

7 [17.] MUTUAL JURISDICTION

8 The Complainant will submit, with respect to any challenges to a decision in the administrative
9 proceeding canceling or transferring the domain name, to [choose one jurisdiction]:

- 10 X a) the location of the principal office of CentralNic or;
- 11 _____ b) the Domain Name holder's address as shown for the registration of the Domain Name in
- 12 CentralNic's WhoIs database at the time the complaint is submitted to the FORUM. CDRP Rule 3(xiv)

13 [18.] CERTIFICATIONS (Supp. Rule 4(a))

14
15 This Complaint does not exceed 15 pages.

16
17 Complainant agrees that its claims and remedies concerning the registration of the domain name, the
18 dispute, or the dispute's resolution shall be solely against the domain-name holder and waives all
19 such claims and remedies against (a) the FORUM and panelists, except in the case of deliberate
20 wrongdoing, (b) CentralNic; as well as their directors, officers, employees, and agents, and (c) the
21 concerned Registrar(s).
22

23 Complainant certifies that the information contained in this Complaint is to the best of Complainant's
24 knowledge complete and accurate, that this Complaint is not being presented for any improper
25 purpose, such as to harass, and that the assertions in this Complaint are warranted under these Rules
26 and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable
27 argument."
28

29 Rule 3(b)(xv).
30

- 31 • I understand that filing fees are non-refundable. Supp Rule 17(c).
- 32 • I understand that my case may be dismissed for failing to properly comply with
- 33 deadlines or other formalities. Rule 4(b).

34
35 Respectfully Submitted,

36 Wanda Brink Manager
37
38 [Signature]

39
40 Wanda Brink, Manager | C-Byte Computer Systems LLC
41 [Name]

42 Oct 1/2015
43
44 [Date]
45



CDRP C-BYTE.US.COM COMPLAINT 2015

CONTENT DIRECTORY

<i>Item description</i>	<i>found on Complaint Page(s)</i>	<i>Exhibit</i>	<i>Page(s)</i>
WHOIS REPORTS FOR DISPUTED DOMAINS	2-3	A	1-2
CONFIRMATION EMAIL MEDIATION	1	A+	3-7
RESPONDENT USPTO APPLICATION	5	B	1-4
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RESPONDENT COMPANY DOCUMENTATION (NEVADA)	5	D	1-3
UDRP DECISION FA1310001523522	4	E	1-28
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GROTESQUE EMAILS 1	5	N	1-7
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USPTO C-BYTE OPPOSER	7	R	1-3
TRADEMARK APPLICATIONS -VEGAS	6	S	1-17
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ALBERTA UN-AUTHORIZED CONNECTION TO C-BYTE	4 & 7	V	1-2
OTHER LEGAL FILINGS	7	W	12

Other Attachments

CentralNic Dispute Resolution Policy

Rules for CentralNic Dispute Resolution Policy

Forum's Supplemental Rules to CentralNic's Domain Name Dispute Resolution Policy



C-Byte Computer Systems LLC)
 185 Broadway Ave.,)
 Alamosa, Colorado 81101)
)
(Complainant))
)
 v.)
)
 Trevor Biscope ,)
 Domain Administrator,)
 C-Byte Company Inc.)
 3565 Las Vegas Blvd South 148)
 Las Vegas, Nevada 89109)
)
(Respondent))
)

Domain Names In Dispute:

- c-byte.club
- c-byte.pw
- c-bytes.com
- c-byte.co
- c-byte.enterprises
- c-byte.international
- c-bytecompany.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 (UDRP), adopted by the Internet Corporation for Assigned Names and Numbers (ICANN) on August 26, 1999 and approved by ICANN on October 24, 1999, and the Rules for Uniform Domain Name Dispute Resolution Policy (UDRP Rules), with an effective date of July 31, 2015, and the FORUM’s Supplemental Rules (Supp. Rules). UDRP Rule 3(b)(i).

[2.] COMPLAINANT INFORMATION

- [a.] Name: *C-byte Computer Systems LLC*
- [b.] Address: *185 Broadway Ave., Alamosa, Colorado 81101*
- [c.] Telephone: *800-641-3750*
- [d.] Fax: *719-696-6055*
- [e.] E-Mail: admin@c-byte.us

3.] COMPLAINANT AUTHORIZED REPRESENTATIVE, IF ANY

- [a.] Name: Wanda Brink Manager
 [b.] Address: PO Box 1896 Alamosa CO 81101
 [c.] Telephone: 719-480-3932
 [d.] Fax: 719-696-6055
 [e.] E-Mail: admin@c-byte.company

UDRP Rule 3(b)(ii).

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

- [a.] Contact Name(s): Wanda Brink Manager
 [b.] Contact Emails(s): admin@c-byte.us | admin@c-byte.company

The Complainant chooses to have this dispute heard before a

X single-member administrative panel; Rule 3(b)(iv).UDRP Rule 3(b)(iv).

[4.] RESPONDENT INFORMATION

As listed for domains: c-byte.club |

- [a.] Name: Trevor Biscope
 [b.] Address 1: Licensee: Vegas License International LLC, c/o Chief Legal Officer
 Address 2: 3565 Las Vegas Blvd South 148
 [c.] Telephone: +1.7027202300
 [d.] Fax:
 [e.] E-Mail: See List Below

As listed for domains: c-byte.pw | c-bytes.com

- [a.] Name: See List Below
 [b.] Address: (VEGAS™) Vegas License International LLC, c/o Chief Legal Officer
 3565 Las Vegas Blvd South 148
 [c.] Telephone: +1.7027202300
 [d.] Fax:
 [e.] E-Mail: See List Below

As listed for domains: c-byte.co | c-byte.enterprises | c-byte.international |
c-bytecompany.com

- [a.] Name: See List Below
 [b.] Address: Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Officer,
 3565 Las Vegas Blvd South 148
 [c.] Telephone: 1.4037707818
 [d.] Fax:
 [e.] E-Mail: See List Below

Domain:	Registrant Name:	Registrant Email:
c-byte.club	Trevor Biscope	2b4e0e5132bd8190485b53cdc6340e7a-698860@contact.gandi.net
c-byte.pw	Trevor Biscope	e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
c-bytes.com	Trevor Biscope	e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
c-byte.co	C-Byte Company, Inc	30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
c-byte.enterprises	Domain Administrator	30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
c-byte.international	Domain Administrator	30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
c-bytecompany.com	Domain Administrator	30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net

*(Exhibit A -Whois Reports For Disputed Domains)***[5.] RESPONDENT AUTHORIZED REPRESENTATIVE, IF KNOWN****Not Known***Rule 3(b)(v).*

The domains are controlled and operated by a single person, Trevor Biscope President, of C-Byte Company Inc (incorporated in Nevada, May 23/2014). As the Registrant street address section reveals, the physical address is the same for all domains *(Exhibit A -Whois Reports For Disputed Domains)*

The Registrant Street Address section brings to light, Trevor Biscope's control as well, through the trademark symbol, attached to "[Vegas™]" and "[C-Byte™]".

The United States Patent and Trade Office trademark single applicant Trevor Biscope also holds the same Nevada address March 20/2015 *(Exhibit B- Respondent USPTO Application)* and letter June 2014 *(See Exhibit D-page3- Respondent Company Documentation (Nevada)*).

[6.] DISPUTED DOMAIN NAME(S)

[a.] The following domain name(s) is/are the subject of this Complaint: Rule 3(b)(vi).

c-byte.club	c-bytes.com	c-byte.enterprises	c-byte.pw
c-byte.co	c-byte.international	c-bytecompany.com	

[b.] Registrar Information: for all domains listed on the complaint UDRP Rule 3(b)(vii).

	<i>Registrar</i>	<i>Registrar (Sponsor .co)</i>
[i.] Registrar's Name:	<i>GANDI SAS</i>	<i>CCI REG S.A.</i>
[ii.] Registrar Address:	63-65 Boulevard Massena 75013 Paris France	Torre Global Bank Piso 21 Ofc 21C Panama, Panama 00000 Panamá
[iii.] Telephone Number:	+33.143737851	+57.3162928048
[iv.] E-Mail Address:	legal@support.gandi.net	admin@ccireg.com

[c.] Trademark/Service Mark Information: Rule 3(b)(viii).

C-Byte Computer Systems LLC (Complainant) is a registered single member limited liability corporation formed under the laws of the state of Colorado United States of America. Attached Colorado Secretary of State certificate of good standing *(Exhibit C-page 1- C-Byte Computer Systems LLC Documentation)* Vegas Brand Enterprises Inc is the single member of the limited liability corporation C-Byte Computer Systems LLC. Attached Colorado Secretary of State certificate of good standing *(Exhibit C-page 2 - C-Byte Computer Systems LLC Documentation)* See attached Certificate of Authority, C-Byte Computer Systems LLC *(Exhibit C-page 4 - C-Byte Computer Systems LLC Documentation)*

The physical office location of C-Byte Computer Systems LLC is 185 Broadway Ave Alamosa CO 81101 see photos *(Exhibit C-page 3 - C-Byte Computer Systems LLC Documentation)*

[7.] **FACTUAL AND LEGAL GROUNDS**

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

[UDRP Para. 4(a) (i) (ii) (iii).] outlined as follows ;

(i) your domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and

(ii) you have no rights or legitimate interests in respect of the domain name; and

(iii) your domain name has been registered and is being used in bad faith. (Exhibit ICANN POLICY)

[a.] Domains at issue are identical and/or confusingly similar to; [UDRP Rule 3(b)(ix)(1); UDRP Policy ¶ 4(a)(i).]

i) The Trademark “c-byte” is known to the Respondent. The Complainant, C-Byte Computer Systems LLC and the Respondent are the same in two prior Uniform Domain Name Dispute Resolution Policy (UDRP) arbitration cases in 2 years and two lawsuits. This demonstrates Respondent prior knowledge of the name/brand/mark, and “how” ICANN policy and rules function to administer trademark standards in connection to domain registration(s).

ii) C-BYTE by any domain extension is still “c-byte”. The Complainant owns 26 domains associated with the mark “c-byte” in an attempt to insulate itself, from identity theft and be better positioned in related internet searches. Domains c-byte.com c-byte.net, c-bytecomputersystems.com, c-byte.company c-byte.systems, c-byte.solutions, just to name a few, are registered to the Complainant, (See Exhibit – C- page-7 and pages -5-6 offering bonafide services and products) Complainant domains are the same or similar to the disputed domains registered by the Respondent.

iii) The Respondent is certainly aware by now, that simply changing the domain extension OR MAKING A SLIGHT DIFFERENCE to the registration name causes confusion regarding the business name/brand/mark. With certainty, knows how internet search algorithms function and how domains resolve to their respective websites. The Respondent is intentional and deliberate, in causing confusion, offering similar if not the same products and services.

iv) Respondent is a three times offender and more. The first UDRP process shows that the same Respondent, hi-jacked the domain c-byte.com (Register.com) and used the email system to hi-jack c-byte.net at Name.com LLC . As well, the Respondent registered c-bytecomputersystems.com with GANDI SAS and that is a direct copy of the Complainant’s name. (See Exhibit -E- UDRP #FA1310001523522 and (See Exhibit -G- UDRP #FA1405001562032)

Complainant rights to the c-byte name/brand/mark are clearly established pursuant to UDRP Rule 3(b)(ix)(1); UDRP Policy ¶ 4(a)(i).

[b.] i) No rights; [UDRP Rule 3(b)(ix)(2); UDRP Policy ¶ 4(a)(ii).] *The Panel may consider any relevant aspects included in, but not limited to UDRP Policy ¶ 4(c).*

The Respondent Trevor Biscope, Canadian, a former employee, does NOT have permission or authorization from C-Byte Computer Systems LLC., to use or represent “c-byte” products or services in any way shape or form, publicly or privately in Canada or United States. (See Exhibit –V- Alberta Un-Authorized Connection To C-Byte)

ii) or legitimate interest; [UDRP Rule 3(b)(ix)(2); UDRP Policy ¶ 4(a)(ii).] *The Panel may consider any relevant aspects included in, but not limited to UDRP Policy ¶ 4(c).*

Note: The Respondent, Mr. Biscope, at the time employment terminated, in July of 2013 had a *Canadian address (Alberta) and phone number (Alberta).* (See Exhibit –J- Alberta And Montana (MEP) Maintenance Enforcement Program)

1 The Respondent's vow to get "even" is demonstrated in the **continued use of "c-byte"**.
 2 Since the "rule or ruin" agenda advanced by the Respondent began with the first hijacking
 3 of c-byte.com, the Complainant has looked to ICANN policy, for relief.

4 Meantime, the Respondent registers another "c-byte" domain extension, then files a
 5 frivolous lawsuit, and in doing so, has managed to deliberately and defiantly be "c-byte"
 6 on the internet. Respondent's sham ventures, continues to be a drag on and detrimental to
 7 conducting the normal business of the Complainant. During the last two years (albeit
 8 necessary), time and resources of the company and officers, are spend defending 2
 9 lawsuits, filing 2 arbitration complaints, now a third. (See section 9 ...other legal
 10 proceedings) In knowingly registering these domains the Respondent is seeking to cause
 11 legal and financial injury, as well as capitalize on the Complainant's trademark "c-byte"
 12 internet traffic. Clearly this makes obvious the Respondent's rule or ruin agenda.

13 **Additionally;** the term "frivolous lawsuit" is NOT used lightly in this context, consider
 14 this, among other legal matters; (*See Exhibit-K-Court Decisions*)

15 ▶ the Respondent fails to file a "reply" to his own law suit in Montana (*Page-4-*
 16 *line 8 of Exhibit-K-*)

17 ▶ uses jumbled language, cites no applicable law, in US Federal Court (*Page-2-*
 18 *line 2 & 3 of Exhibit-K-*)

19 ▶ filing a "motion" in US Federal Court without an underlying "complaint, (*Page-1-*
 20 *line 25- of Exhibit-K-*)

21 ▶ includes the Arbitration Panelist and NAF as Defendants . (*Page-1- line 17*
 22 *& 18 of Exhibit-K-*)

23 **Please Note;** the date on domain registration is within days of the Respondent's
 24 lawsuit dismissal in Montana dated April 16th, 2014 (*Compare Exhibit K and Exhibit -*
 25 *G- UDRP # FA1405001562032*) and the 2015 registrations are within days of the US
 26 District court decision. March 16, 2015 (*Compare Exhibit-K- with Exhibit-T-*
 27 *Respondents Vegas Connection*)

28 **iii) The Respondent's uses** the Complainant's mark on gaming/gambling and adult online
 29 activities where the Complainant's mark C-BYTE is clearly present. New screenshots of
 30 Google and Bing searches show how the practice of confusion and deception continues.
 31 (*See Exhibit -L- Links To Vegas Porn Industry*)

32
 33 **The Complainant establishes, that the Respondent has no right or legitimate interest**
 34 **pursuant to UDRP Rule 3(b)(ix)(2); UDRP Policy ¶ 4(a)(ii).** The Panel may consider
 35 any relevant aspects included in, but not limited to **UDRP Policy ¶ 4(c).**

36 **[c.] Registered in Bad Faith** [*UDRP Rule 3(b)(ix)(3); UDRP Policy ¶ 4(a)(iii). The Panel may*
 37 *consider any relevant aspects included in, but not limited to UDRP Policy ¶ 4(b).]*

38 **i)** The Respondent reveals the maliciousness bullying, of this harassment through really
 39 bizarre scurrilous emails. This is proof that this activity on the part of the Respondent is
 40 meant to be disturbing and willfully destructive in nature. (*See bizarre emails Exhibit -N-*
 41 *Grotesque Emails 1*)

42 The email message(s) from the Respondent, using threatening and gloating behavior
 43 provide proof that this conduct is no accident. (*See bizarre emails Exhibit -P- Grotesque*
 44 *Emails 2*)

1 **ii) The Respondent, registers with Nevada's** Secretary of State, in May 2014, an "LLC"
2 and a "Corporation", that deliberately includes the names of the Complainant companies
3 that are registered in Colorado in 2012 and 2013 respectively. (Compare Exhibit -C- with
4 Exhibit-D- noting dates - Colorado filing is Feb 2013 and Nevada is May 2014)

5 **iii) The Respondent on March 20th 2015 applies for "C-BYTE" trademark** with the United
6 States Patent and Trademark Office ("USPTO") and begins to display 1989, as a first use
7 date, on the disputed domain's websites. Since the March 20th 2015 filing, the
8 Complainant was advised that the USPTO application process had begun, so filed for an
9 extension to prepare to oppose the continued theft of "c-byte". The Respondent in planning
10 this end run of due process, tries cleverly to use the USPTO not only to harass the
11 Complainant, but to continue identity theft. Applying to the USPTO as a US citizen, is also
12 bizarre as he was an undocumented Canadian in 2013, or so the Complainant was led to
13 believe. **Note:** The attached exhibit shows "C-Byte Inc" in Canada was dissolved (struck)
14 in 2005 and cannot be used again (See Exhibit -H- Canada NUAN's Report C-Byte)

15 **iv) The Respondent also applied March 20, 2015** to register trademarks; Vegas.XXX
16 Vegas.PORN Vegas.SEX Vegas.ADULT respectively using an address that is shared with
17 United Parcel Service for small business, in Las Vegas, Nevada. "VEGAS" is not part of
18 this UDRP complaint. Nor does its inclusion, purport to navigate the complexities of the
19 Respondent's gambling and/or registration of "VEGAS" domain(s). The Complainant felt
20 it necessary to include the USPTO VEGAS application and latest Office action as evidence,
21 in order to demonstrate the Respondent's doggedness in being considered part of the
22 gambling and porn industry based in the state of Nevada. The Respondent has registered
23 VEGAS with 2 of these extensions as well as different country extensions.
24 Secondly this evidence is included to show that the disputed domain's "c-byte" whois data,
25 share the Respondent's trademark insignia in the Registrant Address section and the same
26 physical address as the Respondent's Vegas domain registrations. Accordingly, the
27 website that the domain "VEGAS.im" resolves to, removes any doubt that the Respondent
28 is actually among other things, involved in hosting and promoting gambling. (Isle of
29 Mann). (See Exhibit -O- Vegas.IM offshore gaming/gambling site. and See Exhibit -L-
30 Links To Vegas Porn Industry) and (See Exhibit-T- Respondent's Vegas Connections) and
31 (See Exhibit -L- on page 4 Displaying C-BYTE on Vegas websites)

32 **v) The "VEGAS.COM" trademark registration(s)** are held by Vegas.com, LLC,
33 3rd floor Corporate Circle Dr., Henderson, Nevada 89074. VEGAS.COM USPTO serial #
34 78656203). (See Exhibit -M- USPTO Vegas.Com)

35 **vi) To a greater extent,** now with a Nevada address (2014-15), and then a Montana
36 address (in 2013), the Respondent, Mr. Biscope is using C-Byte domain(s) to point traffic
37 to Vegas endeavors. This intentionally leads the public to believe that the Complainant
38 allows or approves the use of "Vegas" and agrees with the activities that the Respondent
39 is offering, when in reality nothing could be farther from the truth. Vegas is an established
40 brand with separate organization and interests from the Complainant.
41 The Complainant is a computer hardware and software company offering service to the
42 hospitality industry and is NOT at all in the entertainment or travel industry in competition
43 with anything Las Vegas, Nevada USA. (See Exhibit -C- page-7 and pages -5-6 offering
44 bonafide services and products)

45 **vii) The inappropriate use of the disputed domains** by the Respondent, not only tarnishes
46 the Complainant's image, it implicates the Complainant in illegal activity. Whether or not,
47 fully regulated and/or allowed in some countries, online gambling remains illegal in
48 Colorado.

Succinctly put, the Colorado, Attorney General's office offers grounds for rejecting online gambling and outlines that computer companies shall not engage in operating websites that offer this activity. The Respondent had this information as an employee, and from the last two UDRP processes.

Again, for emphasis, the Respondent's adult entertainment and gambling domains share the SAME physical postal address that is used by the "c-byte" domains that are listed as part of this complaint. (See Exhibit –U- pages 1-8 Colorado Online gambling) and (See Exhibit –S- 1-17 pages... more particularly page -4- of USPTO response to the Respondents Vegas trademark application(s) a clear outline of ICANN trademark policy)

[d] Luring business away

The Respondent is NOT making a legitimate noncommercial or fair use of the domain name(s) , *and the intent for commercial gain is very clear*. The Respondent is offering computer hardware/software services in competition with the Complainant by using "c-byte" knowingly, to lure business away. *(See Exhibit –V- Alberta Un-Authorized Connection To C-Byte)*

TWO UDRP's and now a THIRD with the same Respondent , **UNEQUIVOCALLY** demonstrates bad faith, and repeat offenses.

The Complainant has clearly established, that the Respondent registered the domains in bad faith [UDRP Rule 3(b)(ix)(3); UDRP Policy ¶ 4(a)(iii). The Panel may consider any relevant aspects included in, but not limited to UDRP Policy ¶ 4(b).]

[8.] REMEDY SOUGHT

The Complainant respectfully requests that the Panel issue a decision that the domain-name(s) as follow;

c-byte.club c-bytes.com c-byte.enterprises c-byte.pw
c-byte.co c-byte.international c-bytecompany.com

with registration at Registrar, Gandi SAS be: ~~----~~**TRANSFERRED**~~-----~~ to the Complainant. [**UDRP Rule 3(b)(x); UDRP Policy ¶ 4(i).**]

[9.] OTHER LEGAL PROCEEDINGS UDRP Rule 3(b)(xi).

Due to business and personal identity theft, spam and threats posed by the Respondent; 1/Monday following the first domain hijacking (*August 19th, 2013*) a complaint was filed Federal Bureau (FBI) cyber crime unit (IC3) the number is **I1308191142508922**)

Currently updated to include the latest attempts at blackmail and extortion.

2/ Following the above, also filed a complaint with the Federal Trade Commission the number is 47862294 . This is currently on going.

3/ Filed a complaint with Homeland security and the Post Office as illegal gaming and illegal auctions often use the postal service. *(See Exhibit(s) -W- pages 1-2 Other Legal)*

4/ CDRP complaint filing regarding the domain "c-byte.us.com"; after request for 10 day CentralNic mediation process ended. *(contains the same exhibits as it is the same mark)*

5/ September 16,2015 Opposer to the Respondent's USPTO application for " C-BYTE" USPTO serial number 86571876 *(See Exhibit –R- USPTO C-BYTE Opposer)*

[10.] 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 [*choose one jurisdiction*]:

 X a) the location of the principal office of the concerned registrar or

 b) where the Respondent is located, as shown by the address(es) given for the domain name holder in the Whois Database at the time of the submission of the Complaint to FORUM.

UDRP Rule 3(b)(xiii).

1 [11.] CERTIFICATION

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

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

Respectfully Submitted,

Wanda Brink MANAGER *Sept 29/2015*
[Signature] [Date]

Wanda Brink, Manager | C-byte Computer Systems LLC

[Name]



UDRP C-BYTE.CLUB COMPLAINT 2015

CONTENT DIRECTORY

<i>Item description</i>	<i>found on Complaint Page(s)</i>	<i>Exhibit</i>	<i>Page(s)</i>
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Other Attachments

UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY

RULES FOR UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY (THE "RULES")

SUPPLEMENTAL RULES TO ICANN'S UNIFORM DOMAIN

UDRP C-BYTE.CLUB COMPLAINT 2015

Whois result for c-byte.club

Domain Name: c-byte.club
 Registry Domain ID: D1546218-CLUB
 Registrar WHOIS Server: whois.gandi.net
 Registrar URL: <http://www.gandi.net>
 Updated Date: 2015-04-25T06:40:51Z
 Creation Date: 2015-04-25T04:40:50Z
 Registrar Registration Expiration Date: 2016-04-24T23:59:59Z
 Registrar: GANDI SAS
 Registrar IANA ID: 81
 Registrar Abuse Contact Email: abuse@support.gandi.net
 Registrar Abuse Contact Phone: +33.170377661
 Reseller:
 Domain Status: clientTransferProhibited <http://www.icann.org/epp#clientTransferProhibited>
 Domain Status:
 Domain Status:
 Domain Status:
 Domain Status:
 Registry Registrant ID: TB1530-GANDI
 Registrant Name: Trevor Biscope
 Registrant Organization:
 Registrant Street: Licensee: (VEGAS™) Vegas License International LLC, c/o Chief Legal Officer
 3565 Las Vegas Blvd South 148
 Registrant City: Las Vegas
 Registrant State/Province: Nevada
 Registrant Postal Code: 89109
 Registrant Country: US
 Registrant Phone: +1.7027202300
 Registrant Phone Ext:
 Registrant Fax:
 Registrant Fax Ext:
 Registrant Email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
 Registry Admin ID: TB1530-GANDI
 Admin Name: Trevor Biscope
 Admin Organization:
 Admin Street: Licensee: (VEGAS™) Vegas License International LLC, c/o Chief Legal Officer
 3565 Las Vegas Blvd South 148
 Admin City: Las Vegas
 Admin State/Province: Nevada
 Admin Postal Code: 89109
 Admin Country: US
 Admin Phone: +1.7027202300
 Admin Phone Ext:
 Admin Fax:
 Admin Fax Ext:
 Admin Email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
 Registry Tech ID: TB1530-GANDI
 Tech Name: Trevor Biscope

Tech Organization:
Tech Street: Licensee: (VEGAS™) Vegas License International LLC, c/o Chief Legal Officer
3565 Las Vegas Blvd South 148
Tech City: Las Vegas
Tech State/Province: Nevada
Tech Postal Code: 89109
Tech Country: US
Tech Phone: +1.7027202300
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net

UDRP EXHIBIT A
PAGE 2 OF 14 PAGES
C-BYTE.CLUB

Name Server: A.DNS.GANDI.NET
Name Server: B.DNS.GANDI.NET
Name Server: C.DNS.GANDI.NET

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

DNSSEC: Unsigned

URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>

>>> Last update of WHOIS database: 2015-09-19T17:08:48Z <<<

For more information on Whois status codes, please visit

<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

Reseller Email:

Reseller URL:

Whois

This domain has been registered by Gandi. If you are a contact of this domain, you may:

- Log into your [Administration Page](#) to manage your domains.
- [change the configuration](#) of this domain.
- Whois result for c-byte.pw

You can renew the domain even if you are not one of its contacts, or if your handle is not associated with [renewal page](#)

Whois result for c-byte.pw

```
domain: c-byte.pw
reg_created: 2015-04-25 04:43:40
expires: 2016-04-25 23:59:59
created: 2015-04-25 06:43:41
changed: 2015-04-25 06:43:45
transfer-prohibited: yes
ns0: a.dns.gandi.net
ns1: b.dns.gandi.net
ns2: c.dns.gandi.net
owner-c:
  nic-hdl: TB1530-GANDI
  owner-name: Trevor Biscope
  organisation: ~
  person: Trevor Biscope
  address: "Licensee: (VEGAS™) Vegas License International LLC, c/o Chief
\n3565 Las Vegas Blvd South 148"
  zipcode: 89109
  city: Las Vegas
  state: Nevada
  country: United States of America
  phone: +1.7027202300
  fax: ''
  email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
  lastupdated: 2015-08-15 01:55:27
admin-c:
  nic-hdl: TB1530-GANDI
  owner-name: Trevor Biscope
  organisation: ~
  person: Trevor Biscope
  address: "Licensee: (VEGAS™) Vegas License International LLC, c/o Chief
\n3565 Las Vegas Blvd South 148"
  zipcode: 89109
  city: Las Vegas
  state: Nevada
  country: United States of America
  phone: +1.7027202300
```

fax: ''
email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
lastupdated: 2015-08-15 01:55:27

tech-c:
nic-hdl: TB1530-GANDI
owner-name: Trevor Biscope
organisation: ~
person: Trevor Biscope
address: "Licensee: (VEGAS™) Vegas License International LLC, c/o Chief
\n3565 Las Vegas Blvd South 148"
zipcode: 89109
city: Las Vegas
state: Nevada
country: United States of America
phone: +1.7027202300
fax: ''
email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
lastupdated: 2015-08-15 01:55:27

bill-c:
nic-hdl: TB1530-GANDI
owner-name: Trevor Biscope
organisation: ~
person: Trevor Biscope
address: "Licensee: (VEGAS™) Vegas License International LLC, c/o Chief
\n3565 Las Vegas Blvd South 148"
zipcode: 89109
city: Las Vegas
state: Nevada
country: United States of America
phone: +1.7027202300
fax: ''
email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
lastupdated: 2015-08-15 01:55:27

Personal data access and use are governed by French law, any use for the purpose of unsolicited advertising as well as any mass or automated inquiries (for any intent other than the registration or domain name) are strictly forbidden. Copy of whole or part of our database without Gandi's endorsement is forbidden.

A dispute over the ownership of a domain name may be subject to the alternate procedure established by law or brought before the courts.

For additional information, please contact us via the following form:
<https://www.gandi.net/support/contacter/mail/>

Whois

This domain has been registered by Gandi. If you are a contact of this domain, you may:

- Log into your [Administration Page](#) to manage your domains.
- [change the configuration](#) of this domain.
- Whois result for c-bytes.com

You can renew the domain even if you are not one of its contacts, or if your handle is not associated with a [renewal page](#)

Whois result for c-bytes.com

Domain Name: c-bytes.com
Registry Domain ID: 1940389845_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.gandi.net
Registrar URL: http://www.gandi.net
Updated Date: 2015-06-19T23:17:27Z
Creation Date: 2015-06-19T20:57:37Z
Registrar Registration Expiration Date: 2016-06-19T20:57:37Z
Registrar: GANDI SAS
Registrar IANA ID: 81
Registrar Abuse Contact Email: abuse@support.gandi.net
Registrar Abuse Contact Phone: +33.170377661
Reseller:
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited
Domain Status:
Domain Status:
Domain Status:
Domain Status:
Registry Registrant ID:
Registrant Name: Trevor Biscope
Registrant Organization:
Registrant Street: Licensee: (VEGAS™) Vegas License International LLC, c/o Chi
Officer
3565 Las Vegas Blvd South 148
Registrant City: Las Vegas
Registrant State/Province: Nevada
Registrant Postal Code: 89109
Registrant Country: US
Registrant Phone: +1.7027202300
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
Registry Admin ID:
Admin Name: Trevor Biscope
Admin Organization:
Admin Street: Licensee: (VEGAS™) Vegas License International LLC, c/o Chi

3565 Las Vegas Blvd South 148
Admin City: Las Vegas
Admin State/Province: Nevada
Admin Postal Code: 89109
Admin Country: US
Admin Phone: +1.7027202300
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
Registry Tech ID:
Tech Name: Trevor Biscope
Tech Organization:
Tech Street: Licensee: (VEGAS™) Vegas License International LLC, c/o Chief
3565 Las Vegas Blvd South 148
Tech City: Las Vegas
Tech State/Province: Nevada
Tech Postal Code: 89109
Tech Country: US
Tech Phone: +1.7027202300
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
Name Server: A.DNS.GANDI.NET
Name Server: B.DNS.GANDI.NET
Name Server: C.DNS.GANDI.NET
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
DNSSEC: Unsigned
URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net>
>>> Last update of WHOIS database: 2015-09-19T16:48:36Z <<<

For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

Reseller Email:
Reseller URL:

Personal data access and use are governed by French law, any use for the purpose of unsolicited advertising as well as any mass or automated inquiries (for any intent other than the registration or domain name) are strictly forbidden. Copy of whole or part of our database without Gandi's endorsement is strictly forbidden.

A dispute over the ownership of a domain name may be subject to the alternate procedure established by law or brought before the courts.

For additional information, please contact us via the following form:
<https://www.gandi.net/support/contacter/mail/>

Whois

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- Log into your [Administration Page](#) to manage your domains.
- [change the configuration](#) of this domain.
- Whois result for c-byte.co

You can renew the domain even if you are not one of its contacts, or if your handle is not associated v [renewal page](#)

(

Whois result for c-byte.co

```
domain: c-byte.co
reg_created: 2014-06-09 16:34:44
expires: 2016-06-08 23:59:59
created: 2014-06-09 18:34:45
changed: 2015-05-28 00:37:45
transfer-prohibited: yes
ns0: a.dns.gandi.net
ns1: b.dns.gandi.net
ns2: c.dns.gandi.net
owner-c:
  nic-hdl: TB4549-GANDI
  owner-name: 'C-Byte Company, Inc.'
  organisation: 'C-Byte Company, Inc.'
  person: Domain Administrator
  address: "Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Officer
Vegas Blvd South 148"
  zipcode: 89109
  city: LAS VEGAS
  state: Nevada
  country: United States of America
  phone: +1.4037707818
  fax: ~
  email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
  lastupdated: 2015-08-25 00:13:55
admin-c:
  nic-hdl: TB1530-GANDI
  organisation: ~
  person: Trevor Biscope
  address: "Licensee: (VEGAS™) Vegas License International LLC, c/o Chief
\n3565 Las Vegas Blvd South 148"
  zipcode: 89109
  city: Las Vegas
  state: Nevada
  country: United States of America
  phone: +1.7027202300
  fax: ''
  email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
  lastupdated: 2015-08-15 01:55:27
tech-c:
```

nic-hdl: TB4549-GANDI
owner-name: 'C-Byte Company, Inc.'
organisation: 'C-Byte Company, Inc.'
person: Domain Administrator
address: "Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Office;
Vegas Blvd South 148"
zipcode: 89109
city: LAS VEGAS
state: Nevada
country: United States of America
phone: +1.4037707818
fax: ~
email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
lastupdated: 2015-08-25 00:13:55

bill-c:

nic-hdl: TB4549-GANDI
owner-name: 'C-Byte Company, Inc.'
organisation: 'C-Byte Company, Inc.'
person: Domain Administrator
address: "Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Office;
Vegas Blvd South 148"
zipcode: 89109
city: LAS VEGAS
state: Nevada
country: United States of America
phone: +1.4037707818
fax: ~
email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
lastupdated: 2015-08-25 00:13:55

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A dispute over the ownership of a domain name may be subject to the alternate procedure establis question or brought before the courts.

For additional information, please contact us via the following form:

<https://www.gandi.net/support/contacter/mail/>

Whois result for c-byte.enterprises

Domain Name: c-byte.enterprises
 Registry Domain ID: 2b2d3d52a1154ef6b80735f54ad914ab-D
 Registrar WHOIS Server: whois.gandi.net
 Registrar URL: <http://www.gandi.net>
 Updated Date: 2015-06-13T07:53:39Z
 Creation Date: 2014-06-14T05:22:34Z
 Registrar Registration Expiration Date: 2016-06-14T05:22:34Z
 Registrar: GANDI SAS
 Registrar IANA ID: 81
 Registrar Abuse Contact Email: abuse@support.gandi.net
 Registrar Abuse Contact Phone: +33.170377661
 Reseller:
 Domain Status: clientTransferProhibited <http://www.icann.org/epp#clientTransferProhibited>
 Domain Status:
 Domain Status:
 Domain Status:
 Domain Status:
 Registry Registrant ID: TB4549_GANDI
 Registrant Name: Domain Administrator
 Registrant Organization: C-Byte Company, Inc.
 Registrant Street: Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Officer,
 3565 Las Vegas Blvd South 148
 Registrant City: LAS VEGAS
 Registrant State/Province: Nevada
 Registrant Postal Code: 89109
 Registrant Country: US
 Registrant Phone: +1.4037707818
 Registrant Phone Ext:
 Registrant Fax:
 Registrant Fax Ext:
 Registrant Email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
 Registry Admin ID: TB4549_GANDI
 Admin Name: Domain Administrator
 Admin Organization: C-Byte Company, Inc.
 Admin Street: Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Officer,
 3565 Las Vegas Blvd South 148
 Admin City: LAS VEGAS
 Admin State/Province: Nevada
 Admin Postal Code: 89109
 Admin Country: US
 Admin Phone: +1.4037707818
 Admin Phone Ext:
 Admin Fax:
 Admin Fax Ext:
 Admin Email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
 Registry Tech ID: TB4549_GANDI
 Tech Name: Domain Administrator
 Tech Organization: C-Byte Company, Inc.

Tech Street: Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Officer,
3565 Las Vegas Blvd South 148
Tech City: LAS VEGAS
Tech State/Province: Nevada
Tech Postal Code: 89109
Tech Country: US
Tech Phone: +1.4037707818
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
Name Server: A.DNS.GANDI.NET
Name Server: B.DNS.GANDI.NET
Name Server: C.DNS.GANDI.NET
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
DNSSEC: Unsigned
URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>
>>> Last update of WHOIS database: 2015-09-19T17:11:11Z <<<

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For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

Reseller Email:
Reseller URL:

Whois

C-BYTE CLUB

This domain has been registered by Gandi. If you are a contact of this domain, you may

- Log into your [Administration Page](#) to manage your domains.
- [change the configuration](#) of this domain.
- Whois result for c-byte.international

You can renew the domain even if you are not one of its contacts, or if your handle is not associated with a [renewal page](#)

Whois result for c-byte.international

Domain Name: c-byte.international
Registry Domain ID: 6e10bce3ab7347b2a0ea0616678185b0-D
Registrar WHOIS Server: whois.gandi.net
Registrar URL: http://www.gandi.net
Updated Date: 2015-06-13T07:53:40Z
Creation Date: 2014-06-14T04:55:34Z
Registrar Registration Expiration Date: 2016-06-14T04:55:34Z
Registrar: GANDI SAS
Registrar IANA ID: 81
Registrar Abuse Contact Email: abuse@support.gandi.net
Registrar Abuse Contact Phone: +33.170377661
Reseller:
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited
Domain Status:
Domain Status:
Domain Status:
Domain Status:
Registry Registrant ID: TB4549_GANDI
Registrant Name: Domain Administrator
Registrant Organization: C-Byte Company, Inc.
Registrant Street: Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Office
3565 Las Vegas Blvd South 148
Registrant City: LAS VEGAS
Registrant State/Province: Nevada
Registrant Postal Code: 89109
Registrant Country: US
Registrant Phone: +1.4037707818
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
Registry Admin ID: TB4549_GANDI
Admin Name: Domain Administrator
Admin Organization: C-Byte Company, Inc.
Admin Street: Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Office
3565 Las Vegas Blvd South 148
Admin City: LAS VEGAS
Admin State/Province: Nevada
Admin Postal Code: 89109

Admin Country: US
Admin Phone: +1.4037707818
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
Registry Tech ID: TB4549_GANDI
Tech Name: Domain Administrator
Tech Organization: C-Byte Company, Inc.
Tech Street: Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Office
3565 Las Vegas Blvd South 148
Tech City: LAS VEGAS
Tech State/Province: Nevada
Tech Postal Code: 89109
Tech Country: US
Tech Phone: +1.4037707818
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
Name Server: A.DNS.GANDI.NET
Name Server: B.DNS.GANDI.NET
Name Server: C.DNS.GANDI.NET
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
DNSSEC: Unsigned
URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.intern>
>>> Last update of WHOIS database: 2015-09-19T17:01:22Z <<<

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For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

Reseller Email:
Reseller URL:

Personal data access and use are governed by French law, any use for the purpose of unsolicited advertising as well as any mass or automated inquiries (for any intent other than the registration or domain name) are strictly forbidden. Copy of whole or part of our database without Gandi's endorsement is forbidden.

A dispute over the ownership of a domain name may be subject to the alternate procedure established by law or brought before the courts.

For additional information, please contact us via the following form:
<https://www.gandi.net/support/contacter/mail/>

Whois result for c-bytecompany.com

Domain Name: c-bytecompany.com
 Registry Domain ID: 1939403227_DOMAIN_COM-VRSN
 Registrar WHOIS Server: whois.gandi.net
 Registrar URL: <http://www.gandi.net>
 Updated Date: 2015-08-19T02:35:52Z
 Creation Date: 2015-06-16T21:12:36Z
 Registrar Registration Expiration Date: 2016-06-16T21:12:36Z
 Registrar: GANDI SAS
 Registrar IANA ID: 81
 Registrar Abuse Contact Email: abuse@support.gandi.net
 Registrar Abuse Contact Phone: +33.170377661
 Reseller:
 Domain Status: clientTransferProhibited <http://www.icann.org/epp#clientTransferProhibited>
 Domain Status:
 Domain Status:
 Domain Status:
 Registry Registrant ID:
 Registrant Name: Domain Administrator
 Registrant Organization: C-Byte Company, Inc.
 Registrant Street: Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Officer,
 3565 Las Vegas Blvd South 148
 Registrant City: LAS VEGAS
 Registrant State/Province: Nevada
 Registrant Postal Code: 89109
 Registrant Country: US
 Registrant Phone: +1.4037707818
 Registrant Phone Ext:
 Registrant Fax:
 Registrant Fax Ext:
 Registrant Email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
 Registry Admin ID:
 Admin Name: Trevor Biscope
 Admin Organization:
 Admin Street: Licensee: (VEGAS™) Vegas License International LLC, c/o Chief Legal Officer
 3565 Las Vegas Blvd South 148
 Admin City: Las Vegas
 Admin State/Province: Nevada
 Admin Postal Code: 89109
 Admin Country: US
 Admin Phone: +1.7027202300
 Admin Phone Ext:
 Admin Fax:
 Admin Fax Ext:
 Admin Email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
 Registry Tech ID:
 Tech Name: Trevor Biscope
 Tech Organization:

Tech Street: Licensee: (VEGAS™) Vegas License International LLC, c/o Chief Legal Officer

3565 Las Vegas Blvd South 148

Tech City: Las Vegas

Tech State/Province: Nevada

Tech Postal Code: 89109

Tech Country: US

Tech Phone: +1.7027202300

Tech Phone Ext:

Tech Fax:

Tech Fax Ext:

Tech Email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net

Name Server: A.DNS.GANDI.NET

Name Server: B.DNS.GANDI.NET

Name Server: C.DNS.GANDI.NET

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

DNSSEC: Unsigned

URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>

>>> Last update of WHOIS database: 2015-09-19T17:14:38Z <<<

For more information on Whois status codes, please visit

<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

Reseller Email:

Reseller URL:

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Rules for CentralNic Dispute Resolution Policy

("the Rules")

Administrative proceedings for the resolution of disputes under the CentralNic Dispute Resolution Policy shall be governed by these Rules and also the National Arbitration Forum ("Forum") Supplemental Rules for CentralNic Dispute Resolution Policy.

1. Definitions

In these Rules:

Forum or Provider means the National Arbitration Forum.

CentralNic means CentralNic Ltd, 35-39 Moorgate, London EC2R 6AR, United Kingdom.

CentralNic Mediation means a mediation concerning a Domain Name registration conducted by CentralNic in accordance with the CentralNic Mediation Rules.

Complainant means the party initiating a complaint under the Policy concerning a Domain Name registration.

Domain Name means any domain name registered under a sub-domain provided by CentralNic.

Mutual Jurisdiction means a court jurisdiction at the location of either (a) the principal office of CentralNic or (b) the Domain Name holder's address as shown for the registration of the Domain Name in CentralNic's WhoIs database at the time the complaint is submitted to the Forum.

Panel means an administrative panel appointed by the Forum to decide a complaint concerning a Domain Name registration.

Panelist means an individual appointed by the Forum to be a member of a Panel.

Party means a Complainant or a Respondent.

Policy means the CentralNic Dispute Resolution Policy that is incorporated by reference and made a part of the Registration Agreement.

Registrar means the entity with which the Respondent has registered a domain name that is the subject of a complaint.

Registration Agreement means the agreement between CentralNic or a CentralNic-approved registrar, as the case may be, and a Domain Name holder.

Respondent means the holder of a Domain Name registration against which a complaint is submitted.

Reverse Domain Name Hijacking means using the Policy in bad faith to attempt to deprive a registered Domain Name holder of a Domain Name.

Supplemental Rules means the rules adopted by the Forum to supplement these Rules. Supplemental Rules shall not be inconsistent with the Policy or these Rules and shall cover such topics as fees, word and page limits and guidelines, file size and format modalities, the means for communicating with the Forum and the Panel, and the form of cover sheets.

Written Notice means hardcopy notification by the Provider to the Respondent of the commencement of an administrative proceeding under the Policy which shall inform the Respondent that a complaint has been filed against it, and which shall state that the Provider has electronically transmitted the complaint including any annexes to the Respondent by the means specified herein. Written notice does not include a hardcopy of the complaint itself or of any annexes.

2. Communications

(a) When notifying a complaint to the Respondent, it shall be the Forum's responsibility to employ reasonably available means calculated to achieve actual notice to the Respondent. Achieving actual notice, or employing the following measures to do so, shall discharge this responsibility:

(i) sending Written Notice of the complaint to all postal-mail, facsimile and e-mail addresses shown in the Domain Name's registration data in CentralNic's Whois database for the registered Domain Name holder, the technical contact, and the administrative contact and (B) supplied by CentralNic to the Provider for the registration's billing contact; and

(ii) sending the complaint, including any annexes, in electronic form by e-mail to:

(A) the e-mail addresses for those technical, administrative, and billing contacts;

(B) postmaster@; and

(C) if the domain name (or "www." followed by the domain name) resolves to an active web page (other than a generic page the Provider concludes is maintained by a registrar or ISP for parking domain-names registered by multiple domain-name holders), any e-mail address shown or e-mail links on that web page; and

(iii) sending the complaint, including any annexes, to any e-mail address the Respondent has notified the Forum it prefers and, to the extent practicable, to all other e-mail addresses provided to the Forum by the Complainant under Paragraph 3(b)(vi).

(b) Except as provided in Paragraph 2(a), any written communication to the Complainant or the Respondent provided for under these Rules shall be made electronically via the Internet (a record of its transmission being available), or by any reasonably requested preferred means stated by the Complainant or the Respondent, respectively (see Paragraphs 3(b)(iv) and 5(b)(iii))

(c) Any submission to the Forum or to an Administrative Panel pursuant to these Rules, shall be made by the means and in the manner stated in the Supplemental Rules.

(d) The Forum shall maintain an archive of all communications received or required to be made under the Rules.

(e) Communications shall be made in the language prescribed in Paragraph 11.

(f) Either Party may update its contact details by notifying the Forum, CentralNic and the concerned Registrar for the Domain Name(s).

(g) Except as otherwise provided in these Rules, or decided by a Panel, all communications provided for under these Rules shall be deemed to have been made:

(i) if via the Internet, on the date that the communication was transmitted, provided that the date of transmission is verifiable; or

(ii) if delivered by telecopy or facsimile transmission, on the date shown on the confirmation of transmission; or

(iii) if by postal or courier service, on the date marked on the receipt.

(h) Except as otherwise provided in these Rules, all time periods calculated under these Rules shall begin to run on the earliest date that the communication is deemed to have been made in accordance with Paragraph 2(g).

(i) Any communication by

(i) a Panel to any Party shall be copied to the Forum and to the other Party;

(ii) the Forum to any Party shall be copied to the other Party; and

(iii) a Party shall be copied to the other Party, the Panel and the Forum, as the case may be.

(j) It shall be the responsibility of the sender to retain records of the fact and circumstances of sending, which shall be available for inspection by affected parties and for reporting purposes. This includes the Forum in sending Written Notice to the Respondent by post and/or facsimile under Paragraph 2(a)(i).

(k) In the event a Party sending a communication receives notification of non-delivery of the communication, that Party shall promptly notify the Panel (or, if no Panel is yet appointed, the Forum) of the circumstances of the notification. Further proceedings concerning the communication and any response shall be as directed by the Panel (or the Forum).

3. The Complaint

(a) Any person or entity may submit to the Forum a complaint in accordance with the Policy and these Rules provided that the Domain Name(s) that is/are the subject of the complaint has/have been the subject of a CentralNic Mediation between the same parties. If the Domain Name(s) has/have not been the subject of such Mediation, the Forum shall take no further action on the complaint.

A copy of the complaint shall be sent to the Respondent, CentralNic and to the concerned Registrar.

(b) The complaint including any annexes shall be submitted in electronic form to domaindispute@adrforum.com or via the Forum's online filing portal and shall:

(i) Request that the complaint be submitted for decision in accordance with the Policy and these Rules;

(ii) State that a CentralNic Mediation has been conducted pursuant to the CentralNic Mediation Rules regarding the Domain Name(s) that is/are the subject of the complaint, and that this Mediation has terminated;

(iii) Provide the name, postal and e-mail addresses, and the telephone and telefax numbers of the Complainant and of any representative authorized to act for the Complainant in the administrative proceeding;

(iv) Specify a preferred method for communications directed to the Complainant in the administrative proceeding (including person to be contacted, medium, and address information) for each of (a) electronic-only material and (b) material including hard copy (where applicable);

(v) Designate whether the Complainant elects to have the dispute decided by a single-member or a three-member Panel and, in the event the Complainant elects a three-member Panel, provide the names and contact details of three candidates to serve as one of the panelists in the order of the Complainant's preference (these candidates must be drawn from the Forum's list of panelists);

(vi) Provide the name of the Respondent (Domain Name Holder) and all information (including any postal and e-mail addresses and telephone and telefax numbers) known to the Complainant regarding how to contact the Respondent or any representative of the Respondent, including contact information based on pre-complaint dealings, in sufficient detail to allow the Forum to send the complaint as described in Paragraph 2(a);

(vii) Specify the Domain Name(s) that is/are the subject of the complaint;

(viii) Identify the Registrar(s) with whom the Domain Name(s) is/are registered at the time the complaint is filed;

(ix) Specify the trademark(s) or service mark(s) on which the complaint is based and, for each mark, describe the goods or services, if any, with which the mark is used (the Complainant may also separately describe other goods and services with which it intends, at the time the complaint is submitted, to use the mark in the future);

(x) Describe, in accordance with the Policy, the grounds on which the complaint is made including, in particular,

(1) the manner in which the Domain Name(s) is/are identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and

(2) why the Respondent (Domain Name holder) should be considered as having no rights or legitimate interests in respect of the Domain Name(s) that is/are the subject of the complaint; and

(3) why the Domain Name(s) should be considered as having been registered or being used in bad faith.

(The description should, for elements (2) and (3), discuss any aspects of Paragraphs 4(b) and 4(c) of the Policy that are applicable.

(xi) Specify, in accordance with the Policy, the remedies sought;

(xii) In addition to Paragraph 3(b)(ii), identify any other legal proceedings that have been commenced or terminated in connection with or relating to any of the Domain Name(s) that is/are the subject of the complaint;

(xiii) State that a copy of the complaint, together with the Complaint Transmittal Coversheet as specified in the Supplemental Rules, has been sent or transmitted to the Respondent (Domain Name holder) in accordance with Paragraph 2(b), CentralNic and to the concerned Registrar;

(xiv) Identify the Mutual Jurisdiction (as defined in Paragraph 1) to which the Complainant will submit, with respect to any challenges to a decision in the administrative proceeding canceling or transferring the Domain Name, as follows:

"The Complainant hereby submits to the Mutual Jurisdiction of [identify precisely the court jurisdiction], for the purposes of any challenges to a decision in the administrative proceeding canceling or transferring the Domain Name."

(xv) Conclude with the following statement followed by the signature (in any electronic format) of the Complainant or its authorized representative:

"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 Forum and panelists, except in the case of deliberate wrongdoing, (b) CentralNic; as well as their directors, officers, employees, and agents, and (c) the concerned Registrar(s)."

"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."; and

(xvi) Annex any documentary or other evidence, including any trademark or service mark registration upon which the complaint relies, together with a schedule indexing such evidence.

(c) The complaint may relate to more than one Domain Name, provided that the Domain Names are registered by the same Domain Name holder, and provided that the conditions in Paragraph 3(a) have been met.

4. Notification of Complaint

(a) The Forum shall:

(i) confirm with CentralNic that a CentralNic Mediation has been conducted between the Parties concerning the Domain Name(s) that is/are the subject of the administrative proceeding, and that the Mediation has terminated;

(ii) review the complaint for formal compliance with the Policy, these Rules and the Supplemental Rules.

If the complaint is found to be in compliance with the above requirements, the Forum shall forward it, including any annexes, electronically to the Respondent and shall send Written Notice of the complaint to the Respondent, in the manner prescribed by Paragraph 2(a), within three (3) business days (as observed at the Forum's principal place of business) following receipt of the fees to be paid by the Complainant in accordance with Paragraph 19.

(b) If the Forum finds the complaint to be administratively deficient, it shall promptly notify the Complainant and the Respondent of the nature of the deficiencies identified. The Complainant shall have five (5) calendar days within which to correct any such deficiencies, after which the administrative proceeding will be deemed withdrawn without prejudice to the submission of a different complaint by the Complainant.

(c) The date of commencement of the administrative proceeding shall be the date on which the Forum completes its responsibilities under Paragraph 2(a) in connection with forwarding the Complaint to the Respondent.

(d) The Forum shall immediately notify the Complainant, the Respondent, CentralNic and the concerned Registrar(s) of the date of commencement of the administrative proceeding.

5. The Response

(a) Within twenty (20) calendar days of the date of commencement of the administrative proceeding the Respondent shall submit a response to the Forum.

(b) The response, including any annexes, shall be submitted in electronic form to domaindispute@adrforum.com or via the Forum's online filing portal and shall:

(i) Respond specifically to the statements and allegations contained in the complaint and include any and all bases for the Respondent (Domain Name holder) to retain registration and use of the disputed Domain Name;

(ii) Provide the name, postal and e-mail addresses, and the telephone and telefax numbers of the Respondent (Domain Name holder) and of any representative authorized to act for the Respondent in the administrative proceeding;

(iii) Specify a preferred method for communications directed to the Respondent in the administrative proceeding (including person to be contacted, medium, and address information) for each of (a) electronic-only material and (b) material including hard copy (where applicable);

(iv) If the Complainant has elected a single-member Panel in the complaint (see Paragraph 3 (b)(v)), state whether the Respondent elects instead to have the dispute decided by a three-member Panel;

(v) If either the Complainant or the Respondent elects a three-member Panel, provide the names and contact details of three candidates to serve as one of the panelists in the order of the Respondent's preference (these candidates must be drawn from the Forum's list of panelists);

(vi) Identify any other legal proceedings that have been commenced or terminated in connection with or relating to any of the Domain Name(s) that are the subject of the complaint;

(vii) State that a copy of the response including any annexes has been sent or transmitted to the Complainant, in accordance with Paragraph 2(b); and

(viii) Conclude with the following statement followed by the signature (in any electronic format) of the Respondent or its authorized representative:

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

(ix) Annex any documentary or other evidence upon which the Respondent relies, together with a schedule indexing such documents.

(c) If the Complainant has elected to have the dispute decided by a single-member Panel and the Respondent elects a three-member Panel, the Respondent shall be required to pay one-half of the applicable fee for a three-member Panel as set forth in the Forum's Schedule of Fees. This payment shall

be made at the same time as the response is submitted to the Forum. In the event that the required payment is not so made, the dispute shall be decided by a single-member Panel.

(d) At the request of the Respondent, the Forum may, in exceptional cases, extend the period of time for the filing of the response. The period may also be extended by written stipulation between the Parties, provided the stipulation is approved by the Forum.

(e) If a Respondent does not submit a response, in the absence of exceptional circumstances, the Panel shall decide the dispute based upon the complaint.

6. Appointment of the Panel and Timing of Decision

(a) The Forum shall maintain and publish a publicly available list of panelists and their qualifications.

(b) If neither the Complainant nor the Respondent has elected a three-member Panel (Paragraphs 3(b)(v) and 5(b)(iv)), the Forum shall endeavor to appoint within five (5) business days (as observed at the Forum's principal place of business) following receipt of the response by the Forum or the lapse of the time period for the submission thereof, a single Panelist from its list of panelists. The fees for a single-member Panel shall be paid entirely by the Complainant.

(c) If either the Complainant or the Respondent elects to have the dispute decided by a three-member Panel, the Forum shall appoint three panelists in accordance with the procedures identified in this Paragraph. The fees for a three-member Panel shall be paid in their entirety by the Complainant, except where the election for a three-member Panel was made by the Respondent, in which case the applicable fees shall be shared equally between the Parties.

(d) Unless it has already elected a three-member Panel, the Complainant shall submit to the Forum, within five (5) calendar days of communication of a response in which the Respondent elects a three-member Panel, the names and contact details of three candidates to serve as one of the panelists in the order of its preference (these candidates must be drawn from the Forum's list of panelists).

(e) In the event that the Complainant has, in the complaint, elected to have the dispute decided by a three-member Panel, and the Respondent fails to submit a response pursuant to Paragraph 5, the Complainant may elect instead to have the dispute decided by a single-member Panel.

(f) In the event that either the Complainant or the Respondent elects a three-member Panel, the Forum shall endeavor to appoint one Panelist from the list of candidates provided by each of the Complainant and the Respondent. In appointing the Panelist, the Forum shall, subject to availability, respect the order of preference indicated by a Party. In the event the Forum is unable within five (5) business days (as observed at the Forum's principal place of business) to secure the appointment of a Panelist from either Party's list of candidates, the Forum may make that appointment from its list of panelists.

(g) The third Panelist, who shall be the Presiding Panelist, shall be appointed by the Forum from a list of five (5) candidates submitted by the Forum to the Parties in the manner specified in the Forum's Supplemental Rules.

(h) Where the Respondent does not submit a response or does not submit the payment as provided in Paragraph 5(c), the Forum shall appoint the Panel as follows:

(i) If the Complainant has elected a single-member Panel, the Forum shall appoint the Panelist from its published list;

(ii) If the Complainant has elected a three-member Panel, the Forum shall, subject to availability, appoint one Panelist from the names submitted by the Complainant and shall appoint the second Panelist and the Presiding Panelist from its published list.

(i) Once the entire Panel is appointed, the Forum shall notify the Parties of the panelists appointed and the date by which, absent exceptional circumstances, the Panel shall forward its decision on the complaint to the Forum.

7. Impartiality and Independence

A Panelist shall be impartial and independent and shall have, before accepting appointment, disclosed to the Forum any circumstances giving rise to justifiable doubt as to the Panelist's impartiality or independence. If, at any stage during the administrative proceeding, new circumstances arise that could give rise to justifiable doubt as to the impartiality or independence of the Panelist, that Panelist shall promptly disclose such circumstances to the Forum. In such event, the Forum shall have the discretion to appoint a substitute Panelist.

8. Communication Between Parties and the Panel

No Party or anyone acting on its behalf may have any unilateral communication with the Panel. All communications by a Party to the Panel or to the Forum shall be made to a case administrator appointed by the Forum.

9. Transmission of the File to the Panel

The Forum shall forward the file to the Panel as soon as the Panelist is appointed in the case of a Panel consisting of a single member, or as soon as the last Panelist is appointed in the case of a three-member Panel.

10. General Powers of the Panel

(a) The Panel shall conduct the administrative proceeding in such manner as it considers appropriate in accordance with the Policy and these Rules.

(b) In all cases, the Panel shall ensure that the Parties are treated with equality and that each Party is given a fair opportunity to present its case.

(c) The Panel shall ensure that the administrative proceeding takes place with due expedition. It may, at the request of a Party or on its own motion, extend, in exceptional cases, a period of time fixed by these Rules or by the Panel.

(d) The Panel shall determine the admissibility, relevance, materiality and weight of the evidence.

(e) A Panel shall decide a request by a Party to consolidate multiple domain name disputes in accordance with the Policy and these Rules.

11. Language of Proceedings

(a) Unless otherwise agreed by the Parties, the language of the administrative proceeding shall be English, subject to the authority of the Forum or the Panel, as the case may be, to determine otherwise, having regard to the circumstances of the administrative proceeding.

(b) The Panel may order that any documents submitted in languages other than the language of the administrative proceeding be accompanied by a translation in whole or in part into the language of the administrative proceeding.

12. Further Statements

In addition to the complaint and the response, the Panel may request, in its sole discretion, further statements or documents from either of the Parties.

13. In-Person Hearings

There shall be no in-person hearings (including hearings by teleconference, videoconference, and web conference), unless the Panel determines, in its sole discretion and as an exceptional matter, that such a hearing is necessary for deciding the complaint.

14. Default

(a) In the event that a Party, in the absence of exceptional circumstances, does not comply with any of the time periods established by these Rules or the Panel, the Panel shall proceed to a decision on the complaint.

(b) If a Party, in the absence of exceptional circumstances, does not comply with any provision of, or requirement under, these Rules or any request from the Panel, the Panel shall draw such inferences therefrom as it considers appropriate.

15. Panel Decisions

(a) A Panel shall decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable.

(b) In the absence of exceptional circumstances, a single-member Panel shall forward its decision on the complaint to the Forum within fourteen (14) calendar days of its appointment pursuant to Paragraph 6.

(c) In the case of a three-member Panel, the Panel's decision shall be made by a majority.

(d) The Panel's decision shall be in writing, provide the reasons on which it is based, indicate the date on which it was rendered and identify the name(s) of the Panelist(s).

(e) There shall be no word limit on Panel decisions and dissenting opinions. Any dissenting opinion shall accompany the majority decision. If the Panel concludes that the dispute is not within the scope of Paragraph 4(a) of the Policy, it shall so state. If after considering the submissions the Panel finds that the complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or was brought primarily to harass the Domain Name holder, the Panel shall declare in its decision that the complaint was brought in bad faith and constitutes an abuse of the administrative proceeding.

16. Communication of Decision to Parties

(a) Within three (3) business days (as observed at the Forum's principal place of business) after receiving the decision from the Panel, the Forum shall communicate the full text of the decision to each Party, CentralNic and the concerned Registrar(s). In the event of a determination in favor of the Complainant, CentralNic shall immediately communicate to each Party the date for the implementation of the decision in accordance with the Policy and any action required by the Parties in connection therewith.

(b) Except if the Panel determines otherwise (see Paragraph 4(j) of the Policy), the Forum shall publish the full decision on its publicly accessible web site. In any event, the portion of any decision determining a complaint to have been brought in bad faith (see Paragraph 15(e) of these Rules) shall be published.

17. Settlement or Other Grounds for Termination

(a) If, during an administrative proceeding initiated pursuant to Paragraph 3, the Complainant notifies the Forum or the Panel that the Parties have agreed on a settlement, the Forum or the Panel, as the case may be, shall suspend or terminate the administrative proceeding.

(b) If, before the Panel's decision is made, it becomes unnecessary or impossible to continue the administrative proceeding for any other reason, the Forum or the Panel, as the case may be, shall terminate the administrative proceeding, unless a Party raises justifiable grounds for objection within a period of time to be determined by the Forum or the Panel.

18. Effect of Court Proceedings

(a) In the event of any legal proceedings initiated prior to or during an administrative proceeding in respect of a Domain Name dispute that is the subject of the complaint, the Panel shall have the discretion to decide whether to suspend or terminate the administrative proceeding, or to proceed to a decision.

(b) In the event that a Party initiates any legal proceedings during the pendency of an administrative proceeding in respect of a Domain Name dispute that is the subject of the complaint, it shall promptly notify the Panel and the Forum. See Paragraph 8 above.

19. Fees

(a) The Complainant shall pay to the Forum an initial fixed fee, as set out in the Forum's Schedule of Fees, within the time and in the amount required. A Respondent electing under Paragraph 5(b)(iv) to have the dispute decided by a three-member Panel, rather than the single-member Panel elected by the Complainant, shall pay the Forum one-half the fixed fee for a three-member Panel. See Paragraph 5(c). In all other cases, the Complainant shall bear all of the Forum's fees, except as prescribed under Paragraph 19(d).

(b) The Forum shall be under no obligation to take any action on a complaint until it has received from the Complainant the initial fee in accordance with Paragraph 19(a).

(c) If the Forum has not received the fee within ten (10) calendar days of receiving the complaint, the Forum shall have the discretion to terminate the administrative proceeding.

(d) In exceptional circumstances, for example in the event an in-person hearing is held, the Forum shall request the Parties for the payment of additional fees, which shall be established in agreement with the Parties and the Panel.

(e) If the administrative proceeding is terminated prior to the issuance of a Decision under this Policy, no fees will be refunded.

20. Exclusion of Liability

Except in the case of deliberate wrongdoing, neither the Forum nor a Panelist shall be liable to a Party for any act or omission in connection with any administrative proceeding under these Rules.

21. Amendments

CentralNic reserves the right to modify these Rules at any time. CentralNic will post the revised Rules at least thirty (30) calendar days before they become effective. The version of these Rules in effect at the time of the submission of the complaint to the Forum shall apply to the administrative proceeding commenced thereby.

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Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules")

- i- As approved by the ICANN Board of Directors on [28 September 2013](#).

These Rules are in effect for all UDRP proceedings in which a complaint is submitted to a provider on or after 31 July 2015. The prior version of the Rules, applicable to all proceedings in which a complaint was submitted to a Provider on or before 30 July 2015, is at <https://www.icann.org/resources/pages/rules-be-2012-02-25-en>. UDRP Providers may elect to adopt the notice procedures set forth in these Rules prior to 31 July 2015.

Administrative proceedings for the resolution of disputes under the Uniform Dispute Resolution Policy adopted by ICANN shall be governed by these Rules and also the Supplemental Rules of the Provider administering the proceedings, as posted on its web site. To the extent that the Supplemental Rules of any Provider conflict with these Rules, these Rules supersede.

1. Definitions

In these Rules:

Complainant means the party initiating a complaint concerning a domain-name registration.

ICANN refers to the Internet Corporation for Assigned Names and Numbers.

Lock means a set of measures that a registrar applies to a domain name, which prevents at a minimum any modification to the registrant and registrar information by the Respondent, but does not affect the resolution of the domain name or the renewal of the domain name.

Mutual Jurisdiction means a court jurisdiction at the location of either (a) the principal office of the Registrar (provided the domain-name holder has submitted in its Registration Agreement to that jurisdiction for court adjudication of disputes concerning or arising from the use of the domain name) or (b) the domain-name holder's address as shown for the registration of the domain name in Registrar's Whois database at the time the complaint is submitted to the Provider.

Panel means an administrative panel appointed by a Provider to decide a complaint concerning a domain-name registration.

Panelist means an individual appointed by a Provider to be a member of a Panel.

Party means a Complainant or a Respondent.

Pendency means the time period from the moment a UDRP complaint has been submitted by the Complainant to the UDRP Provider to the time the UDRP decision has been implemented or the UDRP complaint has been terminated.

Policy means the [Uniform Domain Name Dispute Resolution Policy](#) that is incorporated by reference and made a part of the Registration Agreement.

Provider means a dispute-resolution service provider approved by ICANN. A list of such Providers appears at <http://www.icann.org/en/dndr/udrp/approved-providers.htm>.

Registrar means the entity with which the Respondent has registered a domain name that is the subject of a complaint.

Registration Agreement means the agreement between a Registrar and a domain-name holder.

Respondent means the holder of a domain-name registration against which a complaint is initiated.

Reverse Domain Name Hijacking means using the Policy in bad faith to attempt to deprive a registered domain-name holder of a domain name.

Supplemental Rules means the rules adopted by the Provider administering a proceeding to supplement these Rules. Supplemental Rules shall not be inconsistent with the Policy or these Rules and shall cover such topics as fees, word and page limits and guidelines, file size and format modalities, the means for communicating with the Provider and the Panel, and the form of cover sheets.

Written Notice means hardcopy notification by the Provider to the Respondent of the commencement of an administrative proceeding under the Policy which shall inform the respondent that a complaint has been filed against it, and which shall state that the Provider has electronically transmitted the complaint including any annexes to the Respondent by the means specified herein.

Written notice does not include a hardcopy of the complaint itself or of any annexes.

2. Communications

(a) When forwarding a complaint, including any annexes, electronically to the Respondent, it shall be the Provider's responsibility to employ reasonably available means calculated to achieve actual notice to Respondent. Achieving actual notice, or employing the following measures to do so, shall discharge this responsibility:

(i) sending Written Notice of the complaint to all postal-mail and facsimile addresses (A) shown in the domain name's registration data in Registrar's Whois database for the registered domain-name holder, the technical contact, and the administrative contact and (B) supplied by Registrar to the Provider for the registration's billing contact; and

(ii) sending the complaint, including any annexes, in electronic form by e-mail to:

(A) the e-mail addresses for those technical, administrative, and billing contacts;

(B) `postmaster@<the contested domain name>`; and

(C) if the domain name (or "www." followed by the domain name) resolves to an active web page (other than a generic page the Provider concludes is maintained by a registrar or ISP for parking domain-names registered by multiple domain-name holders), any e-mail address shown or e-mail links on that web page; and

(iii) sending the complaint, including any annexes, to any e-mail address the Respondent has notified the Provider it prefers and, to the extent practicable, to all other e-mail addresses provided to the Provider by Complainant under [Paragraph 3\(b\)\(v\)](#).

(b) Except as provided in [Paragraph 2\(a\)](#), any written communication to Complainant or Respondent provided for under these Rules shall be made electronically via the Internet (a record of its transmission being available), or by any reasonably requested preferred means stated by the Complainant or Respondent, respectively (see [Paragraphs 3\(b\)\(iii\)](#) and [5\(b\)\(iii\)](#)).

(c) Any communication to the Provider or the Panel shall be made by the means and in the manner (including, where applicable, the number of copies) stated in the Provider's Supplemental Rules.

(d) Communications shall be made in the language prescribed in [Paragraph 11](#).

(e) Either Party may update its contact details by notifying the Provider and the Registrar.

(f) Except as otherwise provided in these Rules, or decided by a Panel, all communications provided for under these Rules shall be deemed to have been made:

(i) if via the Internet, on the date that the communication was transmitted, provided that the date of transmission is verifiable; or, where applicable

(ii) if delivered by telecopy or facsimile transmission, on the date shown on the confirmation of transmission; or:

(iii) if by postal or courier service, on the date marked on the receipt.

(g) Except as otherwise provided in these Rules, all time periods calculated under these Rules to begin when a communication is made shall begin to run on the earliest date that the communication is deemed to have been made in accordance with [Paragraph 2\(f\)](#).

(h) Any communication by

(i) a Panel to any Party shall be copied to the Provider and to the other Party;

(ii) the Provider to any Party shall be copied to the other Party; and

(iii) a Party shall be copied to the other Party, the Panel and the Provider, as the case may be.

(i) It shall be the responsibility of the sender to retain records of the fact and circumstances of sending, which shall be available for inspection by affected parties and for reporting purposes. This includes the Provider in sending Written Notice to the Respondent by post and/or facsimile under [Paragraph 2\(a\)\(i\)](#).

(j) In the event a Party sending a communication receives notification of non-delivery of the communication, the Party shall promptly notify the Panel (or, if no Panel is yet appointed, the Provider) of the circumstances of the notification. Further proceedings concerning the communication and any response shall be as directed by the Panel (or the Provider).

3. The Complaint

(a) Any person or entity may initiate an administrative proceeding by submitting a complaint in accordance with the Policy and these Rules to any Provider approved by ICANN. (Due to capacity constraints or for other reasons, a Provider's ability to accept complaints may be suspended at times. In that event, the Provider shall refuse the submission. The person or entity may submit the

complaint to another Provider.)

(b) The complaint including any annexes shall be submitted in electronic form and shall:

- (i) Request that the complaint be submitted for decision in accordance with the Policy and these Rules;
- (ii) Provide the name, postal and e-mail addresses, and the telephone and telefax numbers of the Complainant and of any representative authorized to act for the Complainant in the administrative proceeding;
- (iii) Specify a preferred method for communications directed to the Complainant in the administrative proceeding (including person to be contacted, medium, and address information) for each of (A) electronic-only material and (B) material including hard copy (where applicable);
- (iv) Designate whether Complainant elects to have the dispute decided by a single-member or a three-member Panel and, in the event Complainant elects a three-member Panel, provide the names and contact details of three candidates to serve as one of the Panelists (these candidates may be drawn from any ICANN-approved Provider's list of panelists);
- (v) Provide the name of the Respondent (domain-name holder) and all information (including any postal and e-mail addresses and telephone and telefax numbers) known to Complainant regarding how to contact Respondent or any representative of Respondent, including contact information based on pre-complaint dealings, in sufficient detail to allow the Provider to send the complaint as described in [Paragraph 2\(a\)](#);
- (vi) Specify the domain name(s) that is/are the subject of the complaint;
- (vii) Identify the Registrar(s) with whom the domain name(s) is/are registered at the time the complaint is filed;
- (viii) Specify the trademark(s) or service mark(s) on which the complaint is based and, for each mark, describe the goods or services, if any, with which the mark is used (Complainant may also separately describe other goods and services with which it intends, at the time the complaint is submitted, to use the mark in the future.);
- (ix) Describe, in accordance with the Policy, the grounds on which the complaint is made including, in particular,
 - (1) the manner in which the domain name(s) is/are identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
 - (2) why the Respondent (domain-name holder) should be considered as having no rights or legitimate interests in respect of the domain name(s) that is/are the subject of the complaint; and
 - (3) why the domain name(s) should be considered as having been registered and being used in bad faith(The description should, for elements (2) and (3), discuss any aspects of [Paragraphs 4\(b\)](#) and [4\(c\)](#) of the Policy that are applicable. The description shall comply with any word or page limit set forth in the Provider's Supplemental Rules.);
- (x) Specify, in accordance with the Policy, the remedies sought;
- (xi) Identify any other legal proceedings that have been commenced or terminated in connection with or relating to any of the domain name(s) that are the subject of the complaint;
- (xii) State that 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 courts in at least one specified Mutual Jurisdiction;
- (xiii) Conclude with the following statement followed by the signature (in any electronic format) of the Complainant or its authorized representative:

"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 dispute-resolution provider 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."; and

(xiv) Annex any documentary or other evidence, including a copy of the Policy applicable to the domain name(s) in dispute and any trademark or service mark registration upon which the complaint relies, together with a schedule indexing such evidence.

(c) The complaint may relate to more than one domain name, provided that the domain names are registered by the same domain-name holder.

4. Notification of Complaint

(a) The Provider shall submit a verification request to the Registrar. The verification request will include a request to Lock the domain name.

(b) Within two (2) business days of receiving the Provider's verification request, the Registrar shall provide the information requested in the verification request and confirm that a Lock of the domain name has been applied. The Registrar shall not notify the Respondent of the proceeding until the Lock status has been applied. The Lock shall remain in place through the remaining Pendency of the UDRP proceeding. Any updates to the Respondent's data, such as through the result of a request by a privacy or proxy provider to reveal the underlying customer data, must be made before the two (2) business day period concludes or before the Registrar verifies the information requested and confirms the Lock to the UDRP Provider, whichever occurs first. Any modification(s) of the Respondent's data following the two (2) business day period may be addressed by the Panel in its decision.

(c) The Provider shall review the complaint for administrative compliance with the Policy and these Rules and, if in compliance, shall forward the complaint, including any annexes, electronically to the Respondent and Registrar and shall send Written Notice of the complaint (together with the explanatory cover sheet prescribed by the Provider's Supplemental Rules) to the Respondent, in the manner prescribed by [Paragraph 2\(a\)](#), within three (3) calendar days following receipt of the fees to be paid by the Complainant in accordance with [Paragraph 19](#).

(d) If the Provider finds the complaint to be administratively deficient, it shall promptly notify the Complainant and the Respondent of the nature of the deficiencies identified. The Complainant shall have five (5) calendar days within which to correct any such deficiencies, after which the administrative proceeding will be deemed withdrawn without prejudice to submission of a different complaint by Complainant.

(e) If the Provider dismisses the complaint due to an administrative deficiency, or the Complainant voluntarily withdraws its complaint, the Provider shall inform the Registrar that the proceedings have been withdrawn, and the Registrar shall release the Lock within one (1) business day of receiving the dismissal or withdrawal notice from the Provider.

(f) The date of commencement of the administrative proceeding shall be the date on which the Provider completes its responsibilities under [Paragraph 2\(a\)](#) in connection with sending the complaint to the Respondent.

(g) The Provider shall immediately notify the Complainant, the Respondent, the concerned Registrar(s), and ICANN of the date of commencement of the administrative proceeding. The Provider shall inform the Respondent that any corrections to the Respondent's contact information during the remaining Pendency of the UDRP proceedings shall be communicated to the Provider further to Rule 5(c)(ii) and 5(c)(iii).

5. The Response

(a) Within twenty (20) days of the date of commencement of the administrative proceeding the Respondent shall submit a response to the Provider.

(b) The Respondent may expressly request an additional four (4) calendar days in which to respond to the complaint, and the Provider shall automatically grant the extension and notify the Parties thereof. This extension does not preclude any additional extensions that may be given further to 5(d) of the Rules.

(c) The response, including any annexes, shall be submitted in electronic form and shall:

(i) Respond specifically to the statements and allegations contained in the complaint and include any and all bases for the Respondent (domain-name holder) to retain registration and use of the disputed domain name (This portion of the response shall comply with any word or page limit set forth in the Provider's Supplemental Rules.);

(ii) Provide the name, postal and e-mail addresses, and the telephone and telefax numbers of the Respondent (domain-name holder) and of any representative authorized to act for the Respondent

in the administrative proceeding;

(iii) Specify a preferred method for communications directed to the Respondent in the administrative proceeding (including person to be contacted, medium, and address information) for each of (A) electronic-only material and (B) material including hard copy (where applicable);

(iv) If Complainant has elected a single-member panel in the complaint (see [Paragraph 3\(b\)\(iv\)](#)), state whether Respondent elects instead to have the dispute decided by a three-member panel;

(v) If either Complainant or Respondent elects a three-member Panel, provide the names and contact details of three candidates to serve as one of the Panelists (these candidates may be drawn from any ICANN-approved Provider's list of panelists);

(vi) Identify any other legal proceedings that have been commenced or terminated in connection with or relating to any of the domain name(s) that are the subject of the complaint;

(vii) State that a copy of the response including any annexes has been sent or transmitted to the Complainant, in accordance with [Paragraph 2\(b\)](#); and

(viii) Conclude with the following statement followed by the signature (in any electronic format) of the Respondent or its authorized representative:

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

(ix) Annex any documentary or other evidence upon which the Respondent relies, together with a schedule indexing such documents.

(d) If Complainant has elected to have the dispute decided by a single-member Panel and Respondent elects a three-member Panel, Respondent shall be required to pay one-half of the applicable fee for a three-member Panel as set forth in the Provider's Supplemental Rules. This payment shall be made together with the submission of the response to the Provider. In the event that the required payment is not made, the dispute shall be decided by a single-member Panel.

(e) At the request of the Respondent, the Provider may, in exceptional cases, extend the period of time for the filing of the response. The period may also be extended by written stipulation between the Parties, provided the stipulation is approved by the Provider.

(f) If a Respondent does not submit a response, in the absence of exceptional circumstances, the Panel shall decide the dispute based upon the complaint.

6. Appointment of the Panel and Timing of Decision

(a) Each Provider shall maintain and publish a publicly available list of panelists and their qualifications.

(b) If neither the Complainant nor the Respondent has elected a three-member Panel ([Paragraphs 3\(b\)\(iv\)](#) and [5\(b\)\(iv\)](#)), the Provider shall appoint, within five (5) calendar days following receipt of the response by the Provider, or the lapse of the time period for the submission thereof, a single Panelist from its list of panelists. The fees for a single-member Panel shall be paid entirely by the Complainant.

(c) If either the Complainant or the Respondent elects to have the dispute decided by a three-member Panel, the Provider shall appoint three Panelists in accordance with the procedures identified in [Paragraph 6\(e\)](#). The fees for a three-member Panel shall be paid in their entirety by the Complainant, except where the election for a three-member Panel was made by the Respondent, in which case the applicable fees shall be shared equally between the Parties.

(d) Unless it has already elected a three-member Panel, the Complainant shall submit to the Provider, within five (5) calendar days of communication of a response in which the Respondent elects a three-member Panel, the names and contact details of three candidates to serve as one of the Panelists. These candidates may be drawn from any ICANN-approved Provider's list of panelists.

(e) In the event that either the Complainant or the Respondent elects a three-member Panel, the Provider shall endeavor to appoint one Panelist from the list of candidates provided by each of the Complainant and the Respondent. In the event the Provider is unable within five (5) calendar days to secure the appointment of a Panelist on its customary terms from either Party's list of candidates, the Provider shall make that appointment from its list of panelists. The third Panelist shall be appointed by the Provider from a list of five candidates submitted by the Provider to the Parties, the Provider's selection from among the five being made in a manner that reasonably balances the

preferences of both Parties, as they may specify to the Provider within five (5) calendar days of the Provider's submission of the five-candidate list to the Parties.

(f) Once the entire Panel is appointed, the Provider shall notify the Parties of the Panelists appointed and the date by which, absent exceptional circumstances, the Panel shall forward its decision on the complaint to the Provider.

7. Impartiality and Independence

A Panelist shall be impartial and independent and shall have, before accepting appointment, disclosed to the Provider any circumstances giving rise to justifiable doubt as to the Panelist's impartiality or independence. If, at any stage during the administrative proceeding, new circumstances arise that could give rise to justifiable doubt as to the impartiality or independence of the Panelist, that Panelist shall promptly disclose such circumstances to the Provider. In such event, the Provider shall have the discretion to appoint a substitute Panelist.

8. Communication Between Parties and the Panel

No Party or anyone acting on its behalf may have any unilateral communication with the Panel. All communications between a Party and the Panel or the Provider shall be made to a case administrator appointed by the Provider in the manner prescribed in the Provider's Supplemental Rules.

9. Transmission of the File to the Panel

The Provider shall forward the file to the Panel as soon as the Panelist is appointed in the case of a Panel consisting of a single member, or as soon as the last Panelist is appointed in the case of a three-member Panel.

10. General Powers of the Panel

(a) The Panel shall conduct the administrative proceeding in such manner as it considers appropriate in accordance with the Policy and these Rules.

(b) In all cases, the Panel shall ensure that the Parties are treated with equality and that each Party is given a fair opportunity to present its case.

(c) The Panel shall ensure that the administrative proceeding takes place with due expedition. It may, at the request of a Party or on its own motion, extend, in exceptional cases, a period of time fixed by these Rules or by the Panel.

(d) The Panel shall determine the admissibility, relevance, materiality and weight of the evidence.

(e) A Panel shall decide a request by a Party to consolidate multiple domain name disputes in accordance with the Policy and these Rules.

11. Language of Proceedings

(a) Unless otherwise agreed by the Parties, or specified otherwise in the Registration Agreement, the language of the administrative proceeding shall be the language of the Registration Agreement, subject to the authority of the Panel to determine otherwise, having regard to the circumstances of the administrative proceeding.

(b) The Panel may order that any documents submitted in languages other than the language of the administrative proceeding be accompanied by a translation in whole or in part into the language of the administrative proceeding.

12. Further Statements

In addition to the complaint and the response, the Panel may request, in its sole discretion, further statements or documents from either of the Parties.

13. In-Person Hearings

There shall be no in-person hearings (including hearings by teleconference, videoconference, and web conference), unless the Panel determines, in its sole discretion and as an exceptional matter, that such a hearing is necessary for deciding the complaint.

14. Default

(a) In the event that a Party, in the absence of exceptional circumstances, does not comply with any of the time periods established by these Rules or the Panel, the Panel shall proceed to a decision on the complaint.

(b) If a Party, in the absence of exceptional circumstances, does not comply with any provision of, or requirement under, these Rules or any request from the Panel, the Panel shall draw such inferences

therefrom as it considers appropriate.

15. Panel Decisions

- (a) A Panel shall decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable.
- (b) In the absence of exceptional circumstances, the Panel shall forward its decision on the complaint to the Provider within fourteen (14) days of its appointment pursuant to [Paragraph 6](#).
- (c) In the case of a three-member Panel, the Panel's decision shall be made by a majority.
- (d) The Panel's decision shall be in writing, provide the reasons on which it is based, indicate the date on which it was rendered and identify the name(s) of the Panelist(s).
- (e) Panel decisions and dissenting opinions shall normally comply with the guidelines as to length set forth in the Provider's Supplemental Rules. Any dissenting opinion shall accompany the majority decision. If the Panel concludes that the dispute is not within the scope of [Paragraph 4\(a\)](#) of the Policy, it shall so state. If after considering the submissions the Panel finds that the complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or was brought primarily to harass the domain-name holder, the Panel shall declare in its decision that the complaint was brought in bad faith and constitutes an abuse of the administrative proceeding.

16. Communication of Decision to Parties

- (a) Within three (3) business days after receiving the decision from the Panel, the Provider shall communicate the full text of the decision to each Party, the concerned Registrar(s), and ICANN. The concerned Registrar(s) shall within three (3) business days of receiving the decision from the Provider communicate to each Party, the Provider, and ICANN the date for the implementation of the decision in accordance with the Policy.
- (b) Except if the Panel determines otherwise (see [Paragraph 4\(j\)](#) of the Policy), the Provider shall publish the full decision and the date of its implementation on a publicly accessible web site. In any event, the portion of any decision determining a complaint to have been brought in bad faith (see [Paragraph 15\(e\)](#) of these Rules) shall be published.

17. Settlement or Other Grounds for Termination

- (a) If, before the Panel's decision, the Parties agree on a settlement, the Panel shall terminate the administrative proceeding. A settlement shall follow steps 17(a)(i) – 17(a)(vii):
 - (i) The Parties provide written notice of a request to suspend the proceedings because the parties are discussing settlement to the Provider.
 - (ii) The Provider acknowledges receipt of the request for suspension and informs the Registrar of the suspension request and the expected duration of the suspension.
 - (iii) The Parties reach a settlement and provide a standard settlement form to the Provider further to the Provider's supplemental rules and settlement form. The standard settlement form is not intended to be an agreement itself, but only to summarize the essential terms of the Parties' separate settlement agreement. The Provider shall not disclose the completed standard settlement form to any third party.
 - (iv) The Provider shall confirm to the Registrar, copying the Parties, the outcome of the settlement as it relates to actions that need to be taken by the Registrar.
 - (v) Upon receiving notice from the Provider further to 17(a)(iv), the Registrar shall remove the Lock within two (2) business days.
 - (vi) The Complainant shall confirm to the Provider that the settlement as it relates to the domain name(s) has been implemented further to the Provider's supplemental rules.
 - (vii) The Provider will dismiss the proceedings without prejudice unless otherwise stipulated in the settlement.
- (b) If, before the Panel's decision is made, it becomes unnecessary or impossible to continue the administrative proceeding for any reason, the Panel shall terminate the administrative proceeding, unless a Party raises justifiable grounds for objection within a period of time to be determined by the Panel.

18. Effect of Court Proceedings

- (a) In the event of any legal proceedings initiated prior to or during an administrative proceeding in respect of a domain-name dispute that is the subject of the complaint, the Panel shall have the discretion to decide whether to suspend or terminate the administrative proceeding, or to proceed

to a decision.

(b) In the event that a Party initiates any legal proceedings during the Pendency of an administrative proceeding in respect of a domain-name dispute that is the subject of the complaint, it shall promptly notify the Panel and the Provider. See [Paragraph 8](#) above.

1. Fees

(a) The Complainant shall pay to the Provider an initial fixed fee, in accordance with the Provider's Supplemental Rules, within the time and in the amount required. A Respondent electing under [Paragraph 5\(b\)\(iv\)](#) to have the dispute decided by a three-member Panel, rather than the single-member Panel elected by the Complainant, shall pay the Provider one-half the fixed fee for a three-member Panel. See [Paragraph 5\(c\)](#). In all other cases, the Complainant shall bear all of the Provider's fees, except as prescribed under [Paragraph 19\(d\)](#). Upon appointment of the Panel, the Provider shall refund the appropriate portion, if any, of the initial fee to the Complainant, as specified in the Provider's Supplemental Rules.

(b) No action shall be taken by the Provider on a complaint until it has received from Complainant the initial fee in accordance with [Paragraph 19\(a\)](#).

(c) If the Provider has not received the fee within ten (10) calendar days of receiving the complaint, the complaint shall be deemed withdrawn and the administrative proceeding terminated.

(d) In exceptional circumstances, for example in the event an in-person hearing is held, the Provider shall request the Parties for the payment of additional fees, which shall be established in agreement with the Parties and the Panel.

1. Exclusion of Liability

Except in the case of deliberate wrongdoing, neither the Provider nor a Panelist shall be liable to a Party for any act or omission in connection with any administrative proceeding under these Rules.

2. Amendments

The version of these Rules in effect at the time of the submission of the complaint to the Provider shall apply to the administrative proceeding commenced thereby. These Rules may not be amended without the express written approval of ICANN.

Opposer's Supplemental Exhibit page 6 A

10 14 2015 new c-byte domain listing for respondent

Thursday, October 15, 2015

3:09 PM

Whois Record (last updated on 2015-10-15)
Domain Name: 187799c-byte.com
Registry Domain ID: 1968689107_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.gandi.net
Registrar URL: <http://www.gandi.net>
Updated Date: 2015-10-14T21:42:37Z
Creation Date: 2015-10-14T19:42:36Z
Registrar Registration Expiration Date: 2016-10-14T19:42:36Z
Registrar: GANDI SAS
Registrar IANA ID: 81
Registrar Abuse Contact Email: abuse@support.gandi.net
Registrar Abuse Contact Phone: +33.170377661
Reseller:
Domain Status: clientTransferProhibited <http://www.icann.org/epp#clientTransferProhibited>
Domain Status:
Domain Status:
Domain Status:
Domain Status:
Registry Registrant ID:
Registrant Name: Trevor Biscope
Registrant Organization:
Registrant Street: Licensee: (VEGAS™) Vegas License International LLC, c/o Chief Legal Officer
3565 Las Vegas Blvd South 148
Registrant City: Las Vegas
Registrant State/Province: Nevada
Registrant Postal Code: 89109
Registrant Country: US
Registrant Phone: +1.7027202300
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
Registry Admin ID:
Admin Name: Trevor Biscope
Admin Organization:
Admin Street: Licensee: (VEGAS™) Vegas License International LLC, c/o Chief Legal Officer
3565 Las Vegas Blvd South 148
Admin City: Las Vegas
Admin State/Province: Nevada
Admin Postal Code: 89109
Admin Country: US
Admin Phone: +1.7027202300
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
Registry Tech ID:
Tech Name: Trevor Biscope
Tech Organization:
Tech Street: Licensee: (VEGAS™) Vegas License International LLC, c/o Chief Legal Officer
3565 Las Vegas Blvd South 148
Tech City: Las Vegas
Tech State/Province: Nevada
Tech Postal Code: 89109
Tech Country: US
Tech Phone: +1.7027202300
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
Name Server: A.DNS.GANDI.NET
Name Server: B.DNS.GANDI.NET
Name Server: C.DNS.GANDI.NET

Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:

DNSSEC: Unsigned

URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>

For more information on Whois status codes, please visit

<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

FROM <<https://whois.domaintools.com/187799c-byte.com>>

Opposer's Supplemental Exhibit page 6 B

187799c-byte.com whois

Thursday, October 15, 2015

3:11 PM

The screenshot shows a web browser window displaying the DomainTools website. The address bar shows the URL: <https://whois.domaintools.com/187799c-byte.com>. The page title is "187799c-Byte.com WHOIS". The browser's address bar includes a search bar and several icons (Norton, Safe, Open, Facebook). The website's navigation bar includes "HOME" and "RESEARCH". The main content area is titled "Whois Record for 187799c-Byte.com". On the left, there is a "Whois & Quick Stats" section with the following information:

- Email: abuse@support.gandi.net is associated with ~865,025 domains. e937a0a836b0305845_@contact.gandi.net
- Registrant Org: Trevor Biscope is associated with ~38 other domains
- Registrar: GANDI SAS
- Registrar Status: clientTransferProhibited
- Dates: Created on 2015-10-14 - Expires on 2016-10-14 - Updated on 2015-10-14
- Name Server(s): A.DNS.GANDI.NET (has 595,732 domains) B.DNS.GANDI.NET (has 595,732 domains) C.DNS.GANDI.NET (has 595,732 domains)
- IP Address: 217.70.184.38 - 669,310 other sites hosted on this server
- IP Location: Ile-de-france - Paris - Gandi Sas
- ASN: AS29169 GANDI-AS GANDI SAS (registered Jun 20, 2003)
- Domain Status: Registered And Active Website
- Whois History: 1 record has been archived since 2015-10-14
- Whois Server: whois.gandi.net

On the right side of the page, there is a "Tools" section with a "Preview the Full Domain Report" button. Below this, there are several tool buttons: "Whois History", "Hosting History", "Monitor Domain Properties", "Reverse Whois Lookup", "Reverse IP Address Lookup", "Reverse Name Server Lookup", "Network Tools", "Buy This Domain", and "Visit Website". Below the tools, there is an advertisement for "Domain Parking Lot" showing a large parking lot filled with cars.

i. Uniform Domain Name Dispute Resolution Policy

(As Approved by ICANN on October 24, 1999)

1. Purpose. This Uniform Domain Name Dispute Resolution Policy (the "Policy") has been adopted by the Internet Corporation for Assigned Names and Numbers ("ICANN"), is incorporated by reference into your Registration Agreement, and sets forth the terms and conditions in connection with a dispute between you and any party other than us (the registrar) over the registration and use of an Internet domain name registered by you. Proceedings under [Paragraph 4](#) of this Policy will be conducted according to the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules of Procedure"), which are available at <http://www.icann.org/en/dndr/udrp/uniform-rules.htm>, and the selected administrative-dispute-resolution service provider's supplemental rules.

2. Your Representations. By applying to register a domain name, or by asking us to maintain or renew a domain name registration, you hereby represent and warrant to us that (a) the statements that you made in your Registration Agreement are complete and accurate; (b) to your knowledge, the registration of the domain name will not infringe upon or otherwise violate the rights of any third party; (c) you are not registering the domain name for an unlawful purpose; and (d) you will not knowingly use the domain name in violation of any applicable laws or regulations. It is your responsibility to determine whether your domain name registration infringes or violates someone else's rights.

3. Cancellations, Transfers, and Changes. We will cancel, transfer or otherwise make changes to domain name registrations under the following circumstances:

- a. subject to the provisions of [Paragraph 8](#), our receipt of written or appropriate electronic instructions from you or your authorized agent to take such action;
- b. our receipt of an order from a court or arbitral tribunal, in each case of competent jurisdiction, requiring such action; and/or
- c. our receipt of a decision of an Administrative Panel requiring such action in any administrative proceeding to which you were a party and which was conducted under this Policy or a later version of this Policy adopted by ICANN. (See [Paragraph 4\(i\)](#) and [\(k\)](#) below.)

We may also cancel, transfer or otherwise make changes to a domain name registration in accordance with the terms of your Registration Agreement or other legal requirements.

4. Mandatory Administrative Proceeding.

This Paragraph sets forth the type of disputes for which you are required to submit to a mandatory administrative proceeding. These proceedings will be conducted before one of the administrative-dispute-resolution service providers listed at www.icann.org/en/dndr/udrp/approved-providers.htm (each, a "Provider").

a. Applicable Disputes. You are required to submit to a mandatory administrative proceeding in the event that a third party (a "complainant") asserts to the applicable Provider, in compliance with the Rules of Procedure, that

- (i) your domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and
- (ii) you have no rights or legitimate interests in respect of the domain name; and
- (iii) your domain name has been registered and is being used in bad faith.

In the administrative proceeding, the complainant must prove that each of these three elements are present.

b. Evidence of Registration and Use in Bad Faith. For the purposes of [Paragraph 4\(a\)\(iii\)](#), the following circumstances, in particular but without limitation, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith:

- (i) circumstances indicating that you have registered or you have acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the domain name; or
- (ii) you have registered the domain name in order to prevent the owner of the trademark or

service mark from reflecting the mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or

(iii) you have registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, you have intentionally attempted to attract, for commercial gain, Internet users to your web site or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of your web site or location or of a product or service on your web site or location.

c. How to Demonstrate Your Rights to and Legitimate Interests in the Domain Name in Responding to a Complaint. When you receive a complaint, you should refer to [Paragraph 5](#) of the Rules of Procedure in determining how your response should be prepared. Any of the following circumstances, in particular but without limitation, if found by the Panel to be proved based on its evaluation of all evidence presented, shall demonstrate your rights or legitimate interests to the domain name for purposes of [Paragraph 4\(a\)\(ii\)](#):

(i) before any notice to you of the dispute, your use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services; or

(ii) you (as an individual, business, or other organization) have been commonly known by the domain name, even if you have acquired no trademark or service mark rights; or

(iii) you are making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

d. Selection of Provider. The complainant shall select the Provider from among those approved by ICANN by submitting the complaint to that Provider. The selected Provider will administer the proceeding, except in cases of consolidation as described in [Paragraph 4\(f\)](#).

e. Initiation of Proceeding and Process and Appointment of Administrative Panel. The Rules of Procedure state the process for initiating and conducting a proceeding and for appointing the panel that will decide the dispute (the "Administrative Panel").

f. Consolidation. In the event of multiple disputes between you and a complainant, either you or the complainant may petition to consolidate the disputes before a single Administrative Panel. This petition shall be made to the first Administrative Panel appointed to hear a pending dispute between the parties. This Administrative Panel may consolidate before it any or all such disputes in its sole discretion, provided that the disputes being consolidated are governed by this Policy or a later version of this Policy adopted by ICANN.

g. Fees. All fees charged by a Provider in connection with any dispute before an Administrative Panel pursuant to this Policy shall be paid by the complainant, except in cases where you elect to expand the Administrative Panel from one to three panelists as provided in [Paragraph 5\(b\)\(iv\)](#) of the Rules of Procedure, in which case all fees will be split evenly by you and the complainant.

h. Our Involvement in Administrative Proceedings. We do not, and will not, participate in the administration or conduct of any proceeding before an Administrative Panel. In addition, we will not be liable as a result of any decisions rendered by the Administrative Panel.

i. Remedies. The remedies available to a complainant pursuant to any proceeding before an Administrative Panel shall be limited to requiring the cancellation of your domain name or the transfer of your domain name registration to the complainant.

j. Notification and Publication. The Provider shall notify us of any decision made by an Administrative Panel with respect to a domain name you have registered with us. All decisions under this Policy will be published in full over the Internet, except when an Administrative Panel determines in an exceptional case to redact portions of its decision.

k. Availability of Court Proceedings. The mandatory administrative proceeding requirements set forth in [Paragraph 4](#) shall not prevent either you or the complainant from submitting the dispute to a court of competent jurisdiction for independent resolution before such mandatory administrative proceeding is commenced or after such proceeding is concluded. If an Administrative Panel decides that your domain name registration should be canceled or transferred, we will wait ten (10) business days (as observed in the location of our principal office) after we are informed by the applicable

Provider of the Administrative Panel's decision before implementing that decision. We will then implement the decision unless we have received from you during that ten (10) business day period official documentation (such as a copy of a complaint, file-stamped by the clerk of the court) that you have commenced a lawsuit against the complainant in a jurisdiction to which the complainant has submitted under [Paragraph 3\(b\)\(xiii\)](#) of the Rules of Procedure. (In general, that jurisdiction is either the location of our principal office or of your address as shown in our Whois database. See [Paragraphs 1](#) and [3\(b\)\(xiii\)](#) of the Rules of Procedure for details.) If we receive such documentation within the ten (10) business day period, we will not implement the Administrative Panel's decision, and we will take no further action, until we receive (i) evidence satisfactory to us of a resolution between the parties; (ii) evidence satisfactory to us that your lawsuit has been dismissed or withdrawn; or (iii) a copy of an order from such court dismissing your lawsuit or ordering that you do not have the right to continue to use your domain name.

5. All Other Disputes and Litigation. All other disputes between you and any party other than us regarding your domain name registration that are not brought pursuant to the mandatory administrative proceeding provisions of [Paragraph 4](#) shall be resolved between you and such other party through any court, arbitration or other proceeding that may be available.

6. Our Involvement in Disputes. We will not participate in any way in any dispute between you and any party other than us regarding the registration and use of your domain name. You shall not name us as a party or otherwise include us in any such proceeding. In the event that we are named as a party in any such proceeding, we reserve the right to raise any and all defenses deemed appropriate, and to take any other action necessary to defend ourselves.

7. Maintaining the Status Quo. We will not cancel, transfer, activate, deactivate, or otherwise change the status of any domain name registration under this Policy except as provided in [Paragraph 3](#) above.

8. Transfers During a Dispute.

a. Transfers of a Domain Name to a New Holder. You may not transfer your domain name registration to another holder (i) during a pending administrative proceeding brought pursuant to [Paragraph 4](#) or for a period of fifteen (15) business days (as observed in the location of our principal place of business) after such proceeding is concluded; or (ii) during a pending court proceeding or arbitration commenced regarding your domain name unless the party to whom the domain name registration is being transferred agrees, in writing, to be bound by the decision of the court or arbitrator. We reserve the right to cancel any transfer of a domain name registration to another holder that is made in violation of this subparagraph.

b. Changing Registrars. You may not transfer your domain name registration to another registrar during a pending administrative proceeding brought pursuant to [Paragraph 4](#) or for a period of fifteen (15) business days (as observed in the location of our principal place of business) after such proceeding is concluded. You may transfer administration of your domain name registration to another registrar during a pending court action or arbitration, provided that the domain name you have registered with us shall continue to be subject to the proceedings commenced against you in accordance with the terms of this Policy. In the event that you transfer a domain name registration to us during the pendency of a court action or arbitration, such dispute shall remain subject to the domain name dispute policy of the registrar from which the domain name registration was transferred.

9. Policy Modifications. We reserve the right to modify this Policy at any time with the permission of ICANN. We will post our revised Policy at <URL> at least thirty (30) calendar days before it becomes effective. Unless this Policy has already been invoked by the submission of a complaint to a Provider, in which event the version of the Policy in effect at the time it was invoked will apply to you until the dispute is over, all such changes will be binding upon you with respect to any domain name registration dispute, whether the dispute arose before, on or after the effective date of our change. In the event that you object to a change in this Policy, your sole remedy is to cancel your domain name registration with us, provided that you will not be entitled to a refund of any fees you paid to us. The revised Policy will apply to you until you cancel your domain name registration

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[Print](#) | [Close Window](#)

Subject: Re: [Ticket#2015081241002204] [Ticket#2015062910003225] request addition of domain to UDRP process
c-byte.us.com
From: CentralNic Support <support@centralnic.com>
Date: Wed, Sep 02, 2015 2:38 am
To: admin@c-byte.us

EXHIBIT A+
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Apologies, we were on a national holiday here in the UK.

The Registrant's have not agreed to the transfer of this domain name therefore I'm sorry to say that mediation has failed.

The next step would be to continue with the UDRP process.

Best regards,
Matt

Your TicketID:2015081241002204

Matt McLeary | CentralNic Support

CentralNic Group PLC

London Stock Exchange Symbol: CNIC

t: +44 (0) 20 33 88 0600

f: +44 (0) 20 33 88 0601

www.centralnic.com

CentralNic Ltd is a company registered in England and Wales with company number 8576358. Registered Offices: 35-39 Moorgate, London, EC2R 6AR

31/08/2015 19:10 - C-Byte Computer Systems LLC \ wrote:

Hi Matt,

The time for meditation has passed and we have not had an update? wb

Wanda Brink, Manager
C-Byte Computer Systems LLC (Colorado) USA

www.c-byte.us

----- Original Message -----

Subject: Re: [Ticket#2015081241002204] [Ticket#2015062910003225] request
addition of domain to UDRP process c-byte.us.com
From: CentralNic Support <support@centralnic.com>
Date: Fri, August 28, 2015 4:32 pm
To: admin@c-byte.us

Hi,

Good day. We apologize for the delays. I will inform Matt and do a follow up on this. Rest assure that you will be updated the soonest.

If you need anything else at the moment, don't hesitate to let me know.

Many thanks!

Your TicketID:2015081241002204

Micah Pil | CentralNic Support

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28/08/2015 18:20 - C-Byte Computer Systems LLC \ wrote:

Is this ticket still working? wb

Wanda Brink, Manager

C-Byte Computer Systems LLC (Colorado) USA

www.c-byte.us

----- Original Message -----

Subject: Re: [Ticket#2015081241002204] [Ticket#2015062910003225] request
addition of domain to UDRP process c-byte.us.com
From: CentralNic Support <support@centralnic.com>
Date: Thu, August 13, 2015 8:15 am
To: admin@c-byte.us

Afternoon,

Mediation has started today - I will update you if there's any response, however, failing any resolution, mediation will end on 27th August.

Regards,
Matt

Your TicketID:2015081241002204

Matt McLeary | CentralNic Support

CentralNic Group PLC

London Stock Exchange Symbol: CNIC

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12/08/2015 15:10 - C-Byte Computer Systems LLC \ wrote:

Hi

We need to begin the 10 day mediation process for the domain registered as c-byte.us.com
Please advise us of what we need to send you and what the process is.

Thank-you wb

Wanda Brink, Manager

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C-Byte Computer Systems LLC (Colorado) USA

www.c-byte.usEXHIBIT AF
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----- Original Message -----

Subject: Re: [Ticket#2015062910003225] request addition of domain to UDRP process c-byte.us.com
From: CentralNic Support <support@centralnic.com>
Date: Mon, July 06, 2015 9:32 am
To: admin@c-byte.us

Hi,

Once the NAF confirms the inclusion of the domain with us, they'll initiate it!

Thanks,
Matt

Your TicketID:2015062910003225

Matt McLeary | CentralNic Support

CentralNic Group PLC

London Stock Exchange Symbol: CNIC

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f: +44 (0) 20 33 88 0601

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Registered Offices: 35-39 Moorgate, London, EC2R 6AR

06/07/2015 15:20 - C-Byte Computer Systems LLC \ wrote:Matt,
what is needed for the mediation process? wbWanda Brink, Manager
C-Byte Computer Systems LLC (Colorado) USA
www.c-byte.us

----- Original Message -----

Subject: Re: [Ticket#2015062910003225] request addition of domain to UDRP process c-byte.us.com
From: CentralNic Support <support@centralnic.com>
Date: Mon, July 06, 2015 3:12 am
To: admin@c-byte.us

Good morning,

Thanks for your email - I've reviewed the complaint and we would be happy for c-byte.us.com to make part of your current proceedings, however, we need to initiate the 10-day mediation before the NAF will be able to take it over as it's within our standard T&Cs to include 10-days mediation prior to domain proceedings being initiated.

We'll take what ever approach best matches yours but you'll need to contact the NAF firstly to 1) confirm the current UDRP is with them and 2) would they be happy putting current proceedings on

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hold for 10-days while we carry out mediation.

If the NAF is happy to comply with your request do let me know and I'll initiate the mediation on your behalf.

Best regards,
Matt

EXHIBIT A+
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Your TicketID:2015062910003225

Matt McLeary | CentralNic Support

CentralNic Group PLC

London Stock Exchange Symbol: CNIC

t: +44 (0) 20 33 88 0600

f: +44 (0) 20 33 88 0601

www.centralnic.com

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Registered Offices: 35-39 Moorgate, London, EC2R 6AR

29/06/2015 20:50 - C-Byte Computer Systems LLC \ wrote:
CentralNic Arbitration

We are C-Byte Computer Systems LLC (Colorado)
185 Broadway Ave Alamosa Colorado 81101
719-480-3932

admin@c-byte.us

www.c-byte.com

Since the fall of 2013 we have been in conflict with a former employee who has vowed to rule or ruin us .

The Respondent is Trevor Biscope. (latest address in Nevada UPS small business center, Las Vegas)

other address Ontario, Alberta, British Columbia in Canada and Kalispell Montana)

To date we have had two court rulings in our favor as well as two UDRP decisions in our favor managed by National Arbitration Forum.

The last court ruling (see attached) was handed down in Mar 2015. (US Federal Court)

Mr Biscope also included the Panelists and the Forum in this frivolous lawsuit ignoring the fact that the Forum discharges their duties in a neutral process approved by ICANN.

Lately Mr Biscope strategy for harassment has shifted from publishing weird scurrilous false personal attacks to attempts at blackmail with really bizarre twisted threats. (see attached) Unfortunately Mr Biscope has continued with new round of registrations of our mark "c-byte" and

we are forced into a third UDRP and will use the services of National Arbitration Forum Mr Biscope registered c-byte.us.com when we were in the process of court and UDRP so we are asking that CentralNic will see fit to allow C-Byte Computer Systems LLC to include www.c-byte.us.com in this third UDRP process that we are launching for the domains as follows

c-byte.pw | c-byte.co | c-byte.international | c-bytes.com | c-byte.enterprises | c-byte.club

Your consideration is greatly appreciated

Wanda Brink, Manager

C-Byte Computer Systems LLC (Colorado) USA

www.c-byte.us

info@centralnic.com

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EXHIBIT **A+**
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Domain Name: C-BYTE.US.COM
Domain ID: D1670105-CNIC
WHOIS Server: whois.gandi.net
Referral URL: <http://www.gandi.net/>
Updated Date: 2015-08-24T22:18:46.0Z
Creation Date: 2013-12-05T00:00:00.0Z
Registry Expiry Date: 2016-12-05T23:59:59.0Z
Sponsoring Registrar: Gandi SAS
Sponsoring Registrar IANA ID: 81
Domain Status: serverTransferProhibited <https://icann.org/epp#serverTransferProhibited>
Domain Status: serverUpdateProhibited <https://icann.org/epp#serverUpdateProhibited>
Domain Status: serverDeleteProhibited <https://icann.org/epp#serverDeleteProhibited>
Domain Status: serverRenewProhibited <https://icann.org/epp#serverRenewProhibited>
Domain Status: clientTransferProhibited <https://icann.org/epp#clientTransferProhibited>
Registrant ID: TBC20488280-VMDJ
Registrant Name: Domain Administrator
Registrant Organization: C Byte Company Inc.
Registrant Street: Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Officer,, 3565 Las Vegas Blvd South 148
Registrant City: LAS VEGAS
Registrant State/Province: NV
Registrant Postal Code: 89109
Registrant Country: US
Registrant Phone: +1.4037707818
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net
Admin ID: TBS3089845-ZZQJ
Admin Name: Trevor Biscope
Admin Organization:
Admin Street: Licensee: (VEGAS™) Vegas License International LLC, c/o Chief Legal Officer, 3565 Las Vegas Blvd South 148
Admin City: Las Vegas
Admin State/Province: NV
Admin Postal Code: 89109
Admin Country: US
Admin Phone: +1.7027202300
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
Tech ID: TBC20488280-VMDJ
Tech Name: Domain Administrator
Tech Organization: C Byte Company Inc.
Tech Street: Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Officer,, 3565 Las Vegas Blvd South 148
Tech City: LAS VEGAS
Tech State/Province: NV
Tech Postal Code: 89109
Tech Country: US

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Tech Phone: +1.4037707818

Tech Phone Ext:

Tech Fax:

Tech Fax Ext:

Tech Email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net

Name Server: B.DNS.GANDI.NET

Name Server: C.DNS.GANDI.NET

Name Server: A.DNS.GANDI.NET

DNSSEC: unsigned

Billing ID: TBC20488280-VMDJ

Billing Name: Domain Administrator

Billing Organization: C Byte Company Inc.

Billing Street: Licensee: (C-Byte™) C-Byte Company, Inc., Chief Legal Officer,, 3565 Las Vegas Blvd South 148

Billing City: LAS VEGAS

Billing State/Province: NV

Billing Postal Code: 89109

Billing Country: US

Billing Phone: +1.4037707818

Billing Phone Ext:

Billing Fax:

Billing Fax Ext:

Billing Email: 30e1d910090e9c8e482c11eea8edc48b-1914461@contact.gandi.net

>>> Last update of WHOIS database: 2015-09-19T17:56:22.0Z <<<

For more information on Whois status codes, please visit <https://icann.org/epp>

WHOIS <https://manage.centralnic.com/support/view_whois>

EXHIBIT A
PAGE 2 OF 2 PAGES

C-BYTE

C-BYTE.CLUB

MARK DRAWING CODE	4-STANDARD CHARACTER MARK
COLOR DRAWING FLAG	NO

CURRENT OWNER INFORMATION

PARTY TYPE	10-ORIGINAL APPLICANT
NAME	Trevor Biscope
ADDRESS	3565 Las Vegas Blvd South #148 Las Vegas, NV 89109
ENTITY	01-INDIVIDUAL
CITIZENSHIP	United States of America

GOODS AND SERVICES

INTERNATIONAL CLASS	042
DESCRIPTION TEXT	Information technology consulting services; Consulting services in the design and implementation of computer-based information systems for businesses; Consulting services in the field of design, selection, implementation and use of computer hardware and software systems for others; Computer services, namely, providing virtual and non virtual application servers, web servers, file servers, co-location servers, load balancing servers, redundancy servers, media servers and database servers of variable capacity to third party computing and data storage facilities; Developing and hosting a server on a global computer network for the purpose of facilitating e-commerce via such a server; Technical support services, namely, migration of datacenter, server and database applications; Technical support services, namely, technical administration of servers for others and troubleshooting in the nature of diagnosing server problems; Computer programming services, namely, on-line transaction processing (OLTP) and decision support (DSS) applications

GOODS AND SERVICES CLASSIFICATION

INTERNATIONAL CLASS	042	FIRST USE DATE	12/00/1989	FIRST USE IN COMMERCE DATE	12/00/1989	CLASS STATUS	6-ACTIVE
---------------------	-----	----------------	------------	----------------------------	------------	--------------	----------

MISCELLANEOUS INFORMATION/STATEMENTS

CHANGE IN REGISTRATION	NO
PSEUDO MARK	C-BITE

PROSECUTION HISTORY

DATE	ENT CD	ENT TYPE	DESCRIPTION	ENT NUM
06/30/2015	CNSA	O	APPROVED FOR PUB - PRINCIPAL REGISTER	005

C-BYTE.CLUB

06/24/2015	DOCK	D	ASSIGNED TO EXAMINER	004
04/01/2015	MPMK	E	NOTICE OF PSEUDO MARK E-MAILED	003
03/31/2015	NWOS	I	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	002
03/24/2015	NWAP	I	NEW APPLICATION ENTERED IN TRAM	001

CURRENT CORRESPONDENCE INFORMATION

ATTORNEY	Richard H Newman
CORRESPONDENCE ADDRESS	RICHARD H NEWMAN Newman Law Llc 365 Pilot Rd Ste D Las Vegas, NV 89119-3516
DOMESTIC REPRESENTATIVE	NONE

C-BYTE

UDRP EXHIBIT

Trademark Snap Shot Publication Stylesheet
 (Table presents the data on Publication Approval)

OVERVIEW

SERIAL NUMBER	86571876	FILING DATE	03/20/2015
REG NUMBER	0000000	REG DATE	N/A
REGISTER	PRINCIPAL	MARK TYPE	SERVICE MARK
INTL REG #	N/A	INTL REG DATE	N/A
TM ATTORNEY	CUCCIAS, MATTHEW JAMES	L.O. ASSIGNED	116

PUB INFORMATION

RUN DATE	07/01/2015		
PUB DATE	N/A		
STATUS	680-APPROVED FOR PUBLICATION		
STATUS DATE	06/30/2015		
LITERAL MARK ELEMENT	C-BYTE		
DATE ABANDONED	N/A	DATE CANCELLED	N/A
SECTION 2F	NO	SECTION 2F IN PART	NO
SECTION 8	NO	SECTION 8 IN PART	NO
SECTION 15	NO	REPUB 12C	N/A
RENEWAL FILED	NO	RENEWAL DATE	N/A
DATE AMEND REG	N/A		

FILING BASIS

FILED BASIS		CURRENT BASIS		AMENDED BASIS	
1 (a)	YES	1 (a)	YES	1 (a)	NO
1 (b)	NO	1 (b)	NO	1 (b)	NO
44D	NO	44D	NO	44D	NO
44E	NO	44E	NO	44E	NO
66A	NO	66A	NO		
NO BASIS	NO	NO BASIS	NO		

MARK DATA

STANDARD CHARACTER MARK	YES
LITERAL MARK ELEMENT	C-BYTE

OFFICE OF THE SECRETARY OF STATE
OF THE STATE OF COLORADO

CERTIFICATE

I, Wayne W. Williams, as the Secretary of State of the State of Colorado, hereby certify that, according to the records of this office,

C-Byte Computer Systems LLC

is a **Limited Liability Company** formed or registered on 02/05/2013 under the law of Colorado, has complied with all applicable requirements of this office, and is in good standing with this office. This entity has been assigned entity identification number 20131085504.

This certificate reflects facts established or disclosed by documents delivered to this office on paper through 09/14/2015 that have been posted, and by documents delivered to this office electronically through 09/15/2015 @ 09:28:20.

I have affixed hereto the Great Seal of the State of Colorado and duly generated, executed, authenticated, issued, delivered and communicated this official certificate at Denver, Colorado on 09/15/2015 @ 09:28:20 pursuant to and in accordance with applicable law. This certificate is assigned Confirmation Number 9305526.



Secretary of State of the State of Colorado

*****End of Certificate*****

Notice: A certificate issued electronically from the Colorado Secretary of State's Web site is fully and immediately valid and effective. However, as an option, the issuance and validity of a certificate obtained electronically may be established by visiting the Certificate Confirmation Page of the Secretary of State's Web site, <http://www.sos.state.co.us/biz/CertificateSearchCriteria.do> entering the certificate's confirmation number displayed on the certificate, and following the instructions displayed. Confirming the issuance of a certificate is merely optional and is not necessary to the valid and effective issuance of a certificate. For more information, visit our Web site, <http://www.sos.state.co.us/> click Business Center and select "Frequently Asked Questions."

OFFICE OF THE SECRETARY OF STATE
OF THE STATE OF COLORADO

CERTIFICATE

I, Wayne W. Williams, as the Secretary of State of the State of Colorado, hereby certify that, according to the records of this office,

Vegas Brand Enterprises Inc

is a **Corporation** formed or registered on 10/15/2012 under the law of Colorado, has complied with all applicable requirements of this office, and is in good standing with this office. This entity has been assigned entity identification number 20121570722.

This certificate reflects facts established or disclosed by documents delivered to this office on paper through 09/11/2015 that have been posted, and by documents delivered to this office electronically through 09/14/2015 @ 20:26:05.

I have affixed hereto the Great Seal of the State of Colorado and duly generated, executed, authenticated, issued, delivered and communicated this official certificate at Denver, Colorado on 09/14/2015 @ 20:26:05 pursuant to and in accordance with applicable law. This certificate is assigned Confirmation Number 9305301.



Secretary of State of the State of Colorado

*****End of Certificate*****

Notice: A certificate issued electronically from the Colorado Secretary of State's Web site is fully and immediately valid and effective. However, as an option, the issuance and validity of a certificate obtained electronically may be established by visiting the Certificate Confirmation Page of the Secretary of State's Web site, <http://www.sos.state.co.us/biz/CertificateSearchCriteria.do> entering the certificate's confirmation number displayed on the certificate, and following the instructions displayed. Confirming the issuance of a certificate is merely optional and is not necessary to the valid and effective issuance of a certificate. For more information, visit our Web site, <http://www.sos.state.co.us/> click Business Center and select "Frequently Asked Questions."



C-Byte Computer Systems LLC
Colorado USA

185 Broadway Ave
Alamosa CO 81101

www.c-byte.com



Certificate of Authority
Re-stated
C-Byte Computer Systems LLC

C-Byte Computer Systems LLC a single member limited liability company organized according to the laws of Colorado (the "Company"), February 5th, 2013

CERTIFY, that WANDA BRINK is duly elected to serve as a Manager on behalf of the single member, Vegas Brand Enterprises Inc, (a Colorado Corporation formed October 2012, with articles restated August 6th 2013), office located at 185 Broadway, Alamosa, Colorado, 81101, further,

CERTIFY, that the Manager of the Company is authorized and directed to do all things necessary as allowed by law, not limited among other things, to collect monies, order repairs, pay any necessary bills as part of managing domains, hardware and software owned by the Company and/or Member.

Date: AUG 6/2013

Ronald K. Brink

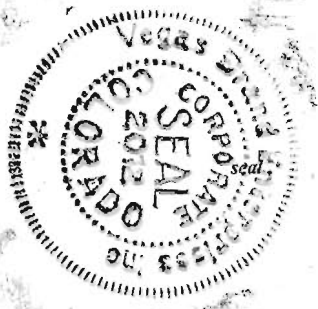
Member, Vegas Brand Enterprises Inc,

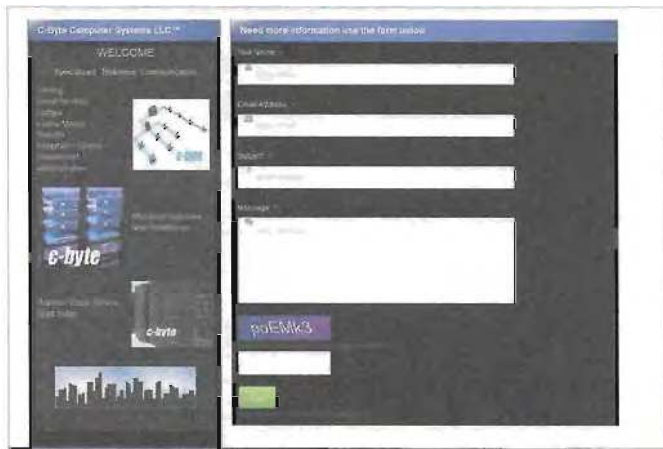
I, RONALD K BRINK certify that this is a true and correct statement prepared for the record and produced on demand, where a demand is necessary .
Witness the Company seal attached.

Date: AUG 6/2013

Wanda Brink Manager

C-Byte Computer Systems LLC, Manager



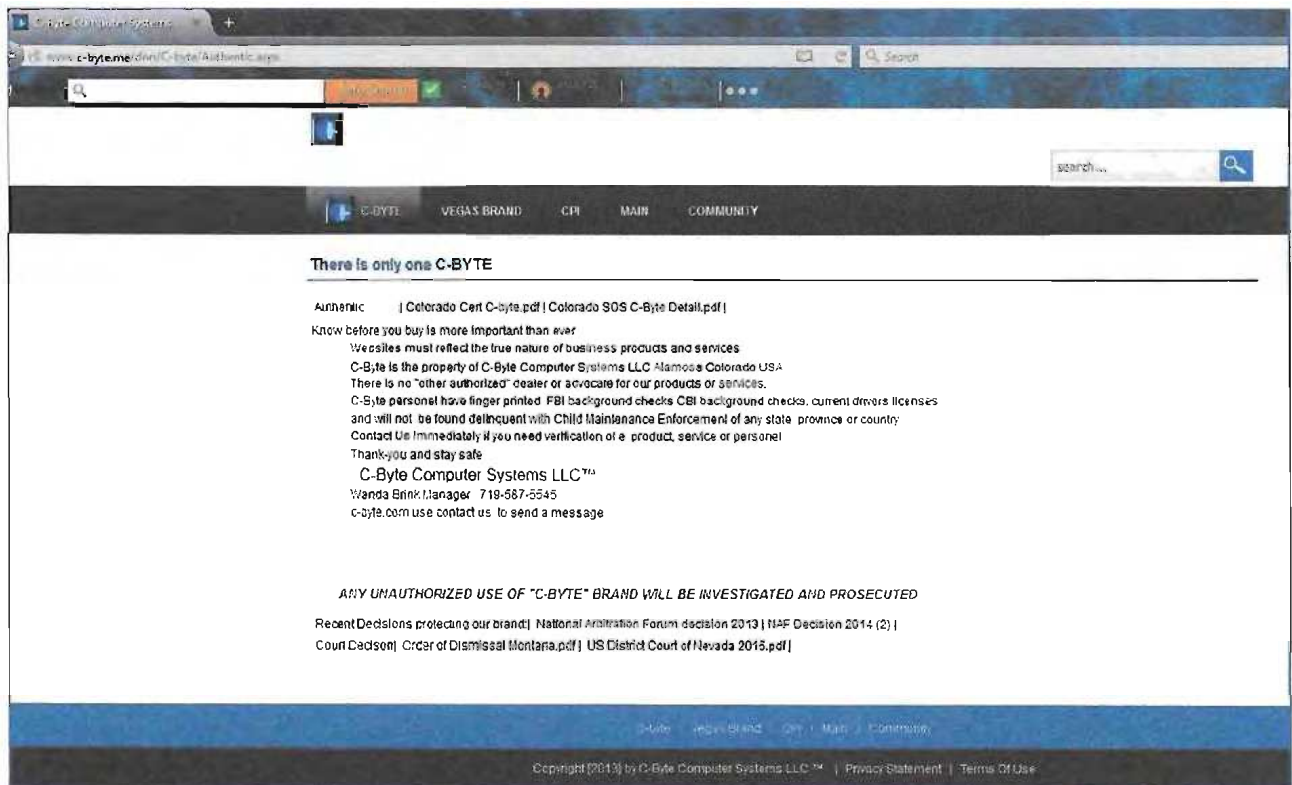
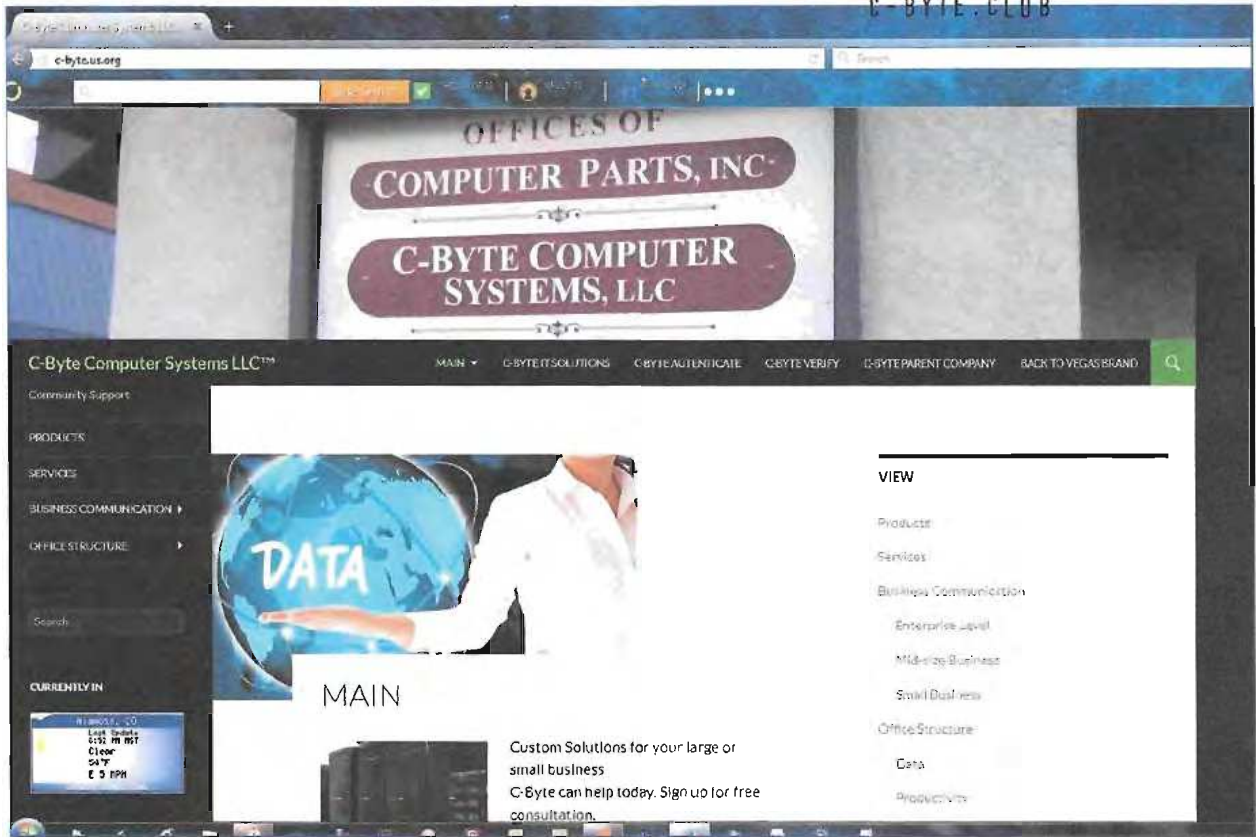


SCREEN SHOTS
OF SOME
AUTHORIZED WEBSITES

c-byte.com
c-byte.me
c-byte.us.org

C-Byte Computer Systems LLC™





INVENTORY continued
DOMAIN LIST

UPDATED 15 day of Sept 2015

C-BYTE.BIZ
C-BYTE.COM
C-BYTE.COMPANY
C-BYTE.COMPUTER
C-BYTE.DIRECT
C-BYTE.DOMAINS
C-BYTE.EMAIL
C-BYTE.GURU
C-BYTE.INFO
C-BYTE.MANAGEMENT
C-BYTE.ME
C-BYTE.MOBI
C-BYTE.US.ORG

C-BYTE.NET
C-BYTE.ORG
C-BYTE.SOLUTIONS
C-BYTE.SUPPORT
C-BYTE.SYSTEMS
C-BYTE.TECHNOLOGY
C-BYTE.US
C-BYTE.WIKI
C-BYTE.XYZ
C-BYTECOMPUTERSYSTEMS.INFO
C-BYTECOMPUTERSYSTEMS.NET
C-BYTECOMPUTERSYSTEMS.ORG
C-BYTECOMPUTERSYSTEMS.COM

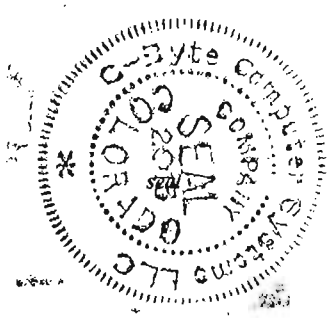
DATE: Sept 15 / 2015

I, the undersigned WANDON BRINK MANAGER CERTIFY that this list is a true and correct copy of domain inventory owned and control by C-BYTE COMPUTER SYSTEMS LLC., a single member limited liability company formed under the law of the State of Colorado.

WITNESS the company seal and my signature

Wanda Brink Manager
Signature

WANDON BRINK MANAGER
Print Name





040104



ROSS MILLER
Secretary of State
204 North Carson Street, Suite 4
Carson City, Nevada 89701-4520
(775) 684-5708
Website: www.nvsos.gov

Articles of Incorporation
(PURSUANT TO NRS CHAPTER 78)

Filed in the office of <i>Ross Miller</i> Ross Miller Secretary of State State of Nevada	Document Number 20140377335-25 Filing Date and Time 05/23/2014 1:28 PM Entity Number E0273142014-5
--	--

(This document was filed electronically.)

ABOVE SPACE IS FOR OFFICE USE ONLY

USE BLACK INK ONLY - DO NOT HIGHLIGHT

1. Name of Corporation:	C-BYTE COMPANY, INC		
2. Registered Agent for Service of Process: (check only one box)	<input checked="" type="checkbox"/> Commercial Registered Agent: EASTBIZ.COM, INC. Name <input type="checkbox"/> Noncommercial Registered Agent (name and address below) OR <input type="checkbox"/> Office or Position with Entity (name and address below) Name of Noncommercial Registered Agent OR Name of Title of Office or Other Position with Entity Street Address City Nevada Zip Code Mailing Address (if different from street address) City Nevada Zip Code		
3. Authorized Stock: (number of shares corporation is authorized to issue)	Number of shares with par value: 7500000	Par value per share: \$ 0.01	Number of shares without par value: 0
4. Names and Addresses of the Board of Directors/Trustees: (each Director/Trustee must be a natural person at least 18 years of age; attach additional page if more than two directors/trustees)	1) TREVOR BISCOPE Name 3565 LAS VEGAS BLVD SOUTH #148 LAS VEGAS NV 89109 Street Address City State Zip Code 2) _____ Name _____ Street Address City State Zip Code		
5. Purpose: (optional; required only if Benefit Corporation status selected)	The purpose of the corporation shall be: ANY LEGAL PURPOSE	6. Benefit Corporation: (see instructions) <input type="checkbox"/> Yes	
7. Name, Address and Signature of Incorporator: (attach additional page if more than one incorporator)	I declare, to the best of my knowledge under penalty of perjury, that the information contained herein is correct and acknowledge that pursuant to NRS 239.330, it is a category C felony to knowingly offer any false or forged instrument for filing in the Office of the Secretary of State. EASTBIZ.COM, INC. EASTBIZ.COM, INC. Name Incorporator Signature 5348 VEGAS DRIVE LAS VEGAS NV 89108 Address City State Zip Code		
8. Certificate of Acceptance of Appointment of Registered Agent:	I hereby accept appointment as Registered Agent for the above named Entity. <input checked="" type="checkbox"/> EASTBIZ.COM, INC. 5/23/2014 Authorized Signature of Registered Agent or On Behalf of Registered Agent Entity Date		

This form must be accompanied by appropriate fees.

SECRETARY OF STATE



CORPORATE CHARTER

I, ROSS MILLER, the duly elected and qualified Nevada Secretary of State, do hereby certify that **C-BYTE COMPANY, INC**, did on May 23, 2014, file in this office the original Articles of Incorporation; that said Articles of Incorporation are now on file and of record in the office of the Secretary of State of the State of Nevada, and further, that said Articles contain all the provisions required by the law of said State of Nevada.



IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Great Seal of State, at my office on May 23, 2014.

ROSS MILLER
Secretary of State

Certified By: Electronic Filing
Certificate Number: C20140523-2072
You may verify this certificate
online at <http://www.nvsos.gov/>



13 June, 2014

C-Byte Computer Systems LLC (Colorado)

and

Vegas Brand Enterprises Inc.

PO Box 1896/185 Broadway Ave)

Alamosa Colorado 81101)

Attn: Wanda Brink, Manager.

Re: Domain Name Dispute with National Arbitration Forum

This letter is to advise you to cease and desist from this harassment behavior.

I incorporated C-Byte Inc. in 1988 under the laws of the province of Alberta. The Corporation had operated in Alberta until 2005 after which it has operated internationally until the present day.

We now operate under a Nevada Corporation and have leased the domain names from The President, Trevor Biscope.

Should this harassing behavior continue we shall be forced, as a business licenced to carry on in the State of Nevada, to seek assistance from the courts of Nevada. Nevada has recognised Trevor Biscope/C-BYTE Company Inc. as the owner of these domain names.

A handwritten signature in black ink, appearing to read 'Lenard D. Biscope', written over a horizontal line.

LENARD D. BISCOPE,

Secretary/Treasurer,

CC: NAF

148 - 3565 Las Vegas Blvd. S. Las Vegas Nevada 89109
US: (800) 393-5804

Print | Close Window

XXXXXXXXXXXX

XXXXXXXXXX

Subject: Nuans Report - C-BYTE INC.
From: "Sharon" <sharon@arvic.com>
Date: Mon, Oct 07, 2013 4:56 am
To: <admin@c-byte.us>
Attach: image001.jpg
C-Byte Inc.pdf

UDRP EXHIBIT H

PAGE 1 OF 12 PAGES

C-BYTE.CLUB

XXXXXXXXXX

NOTE: On page 1 of your report there is a C-BYTE INC. that went struck on June 2, 2005 while it has been struck over the 6 years and is no longer considered a conflict you cannot bring back the exact same name you have to change it in some way by adding another word to the name to make it different from the struck one, you also cannot re-use the same legal entity you can now only use either Limited, Ltd., Corporation, Corp. Also on the nuans there is a Federal name that is phonetically similar in use that will be considered a conflict on page 1 CBIT CANADA INC. and Federal names are protected across Canada.

Hello,
We would like to thank you for ordering your Basic NUANS Report through our online services. We have attached your NUANS to this email message in .pdf format for you to print and save for your records. You will need [Adobe Acrobat Reader](#). This Basic report was designed for those clients who prefer to perform their own online pre-screens and have experience in reading a NUANS report and interpreting its results. Therefore, we have not pre-screened, reviewed, or provided our trained opinion on this report and its results. Please read our [Name Search Approval](#) article to assist you in reviewing your NUANS search results. Once you have reviewed the attached report, and determined the name is register-able, please proceed to our website to complete your [Incorporation Trade Name](#) filing forms. If your NUANS report results are not favorable, please contact us for our assistance in finding an acceptable name for registration. We are always happy to help.

We would like to thank you for choosing us, and if there is anything that we can do for you, such as Domain Name Registration, [www.cadomains.ca](#) or Online Credit Card processing [www.arvicsecure.com](#) please do not hesitate to contact us. **Suggestions** - It is strongly recommended that you register domain names associated with your company. The domains listed as **OK** are available for registration. We invite you to use our automated online registration service available through our domain registration web site, [www.cadomains.ca](#). Click the "Register" link at the top of the page.

Domain Name	.CA	.COM	.NET	.ORG	.INFO	.BIZ	.US
cbyte	taken	taken	taken	taken	OK	OK	OK

Sincerely,
Sharon Niles
Level 1 Corporate Examiner, NUANS ® Specialist
Corporate Paralegal
Direct Line: 780-486-2177
Arvic Search Services Inc.

***PLEASE COMPLETE OUR SURVEY.**

We are looking for feedback to help us build our **NEW** [www.arvic.com](#) web site
<http://www.surveymonkey.com/s/NKKXSFN>

Now is the time to get your business online...make it easy with our Kwiksites Instant Web Site Package.
Build your own site right now at <http://www.kwiksites.com>



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Suite 260, 2323 - 32nd Ave N.E., Calgary, AB, T2E 6Z3
Phone: 403-234-0844 Fax: 403-294-0944 1-888-227-8421

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XXXXXXXXXX

XXXXXXXXXXXX



Alberta Reservation Report / Rapport pour réservation en Alberta C-BYTE . CLUB

C-BYTE INC.
110347865 =C-BYTE=

Page 1 of de 7 2013Oc07

COMPANY NAME / NOM DE L'ENTREPRISE	JUR. NO. DATE	CITY / VILLE	EP	TYPE	STATUS / STATUT	STAT. DATE / DATE EFF.
C-BYTE INC	AB 110347865	2013Oc07			Prop.ARVICAL	
C-BYTE INC	AB 0203955539	1988De30 CALGARY		Bus_Corp	Struck	2005Jn02
CBYT	AB TN16697377	2012Al04		TradeName	Active	
CBIT CANADA INC	CD 0004213271	2003De24 WINNIPEG		CBCA	Active	
C-BAY MEDIA	CD 109312430	2013Jn10			Prop.CRAC	
TROPHY OUTFITTING INC	AB 0203955539	1988De30		Bus_Corp	Historic	1995Fe09
C.B.I.T. CANADIAN BUREAU OF INTERNATIONAL TRADE INC	CD 0003678199	1999No29 MONTREAL		CBCA	Dissolved	2004Jn10
TEAM BEACHBODY CANADA LTD	AB 109318838	2013Jn11			Prop.NCS	
C PRO OFFICE & DIGITAL MEDIA	AB TN16868630	2012Jn27		TradeName	Active	
TEAM BEACHBODY CANADA LTD	AB 2117575890	2013Jn27 VANCOUVER	BC	EP_Corp	Active	
BYTE CAVE SOFTWARE INC	AB 2016511764	2012Ja09 CALGARY		Bus_Corp	Active	
C-SYSTEMS TECHNICAL SERVICES INC	AB 109521725	2013Jl04			Prop.ACCUED	
CREATIVE BYTES LTD	AB 0207249285	1997Ja23 GRANDE PRAIRIE		Bus_Corp	Active	
C. BATES PROFESSIONAL CORPORATION	AB 2015734920	2010De01 LLOYDMINSTER		Bus_Corp	Active	
CEEBI TEC	AB PT14304216	2008Oc06		Ptnrshp	Active	
COMPUTER BOULEVARD (CBIT) INC	CD 0004221532	2004Fe25 WINNIPEG		CBCA	Active	
C-ZONE COMPUTER & NETWORK CONSULTING SERVICES	CD 109684999	2013Jl23			Prop.CANADA	

The Provision of the information contained in this report is subject to the Terms and Conditions contained on the last page here of. The use of this report is the sole responsibility of the applicant. / Les renseignements contenus dans le présent rapport sont sujets aux conditions générales énoncées à la dernière page du document. La responsabilité quant à l'usage du présent rapport incombe entièrement au demandeur.

Valid until / Valide jusqu'au 2014Ja05

NUANS® Name Search System
Système de Recherche de Nom NUANS^{MD}

ARVICAL

DHA007 H=CM V=9,38,42

Alberta Reservation Report / Rapport pour réservation en Alberta **C-BYTE CLUB**C-BYTE INC.
110347865 =C-BYTE=

Page 2 of/de 7 2013Oc07

COMPANY NAME / NOM DE L'ENTREPRISE JUR. NO. DATE CITY / VILLE BUS. / ACT.	EP	TYPE	STATUS / STATUT	STAT. DATE / DATE EFF.
BTY (ALBERTA) LTD AB 0202874822 1982Se28 CALGARY		Bus_Corp	Active	1991Oc22
C-ZONE COMPUTER SERVICES & NETWORK CONSULTING CD 109691554 2013Jl23			Prop.CANADA	
THE BETTY SHOPPE AB 0CAL007859 1949Mr05		TradeName	Active	
BYTEC MANAGEMENT CORPORATION CD 0000682098 1980Au01 NEPEAN		CBCA	Amlgmtg	1983Au01
BYTEC MANAGEMENT CORPORATION CD 0001535927 1983Au01 NEPEAN		CBCA	Amlgmtg	1983Oc27
CYBERTEC COMMUNICATIONS CORP CD 0008152691 2012Mr28 TORONTO		CBCA	Active	
BYTEK AB 0TN7821093 1998Al22		TradeName	Active	
C RITE BOOKS AB TN17230954 2013Ja10		TradeName	Active	
CB-JT CC-TI INC. (CANADIAN BEAVER INFORMATION TECHNOLOGY/CAS.. CD 0006017983 2002Se10 OTTAWA		CBCA	Active	
COMPUTER BYTES AB PT12124368 2005De23		Ptnrshp	Active	
C-MAC SAFETY SERVICES LTD AB 110201747 2013Se19			Prop.ACCUED	
BETTER YET INC AB 2011154628 2004Jn28 OKOTOKS		Bus_Corp	Active	2009Mr17
E-BET EXPORTS INC AB 2016324994 2011Se30 EDMONTON		Bus_Corp	Active	
BYTE VIDEO CD 109067277 2013Ma14			Prop.CANADA	
BYTT INC CD 0007191715 2009Jn16 KANATA		CBCA	Active	
BYTE BY BYTE INC AB 0208630004 2000Ja24 CALGARY		Bus_Corp	Active	2003Mr03
HAPPY BYTE CONSULTING LTD AB 2016572352 2012Fe06 CALGARY		Bus_Corp	Active	

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Valid until / Valide jusqu'au 2014Ja05

NUANS® Name Search System
Système de Recherche de Nom NUANS^{MD}

ARVICAL

DHA007 H=CM V=9,38,42

**Alberta Reservation Report / Rapport pour réservation en Alberta**C-BYTE INC.
110347865 =C-BYTE=

Page 3 of/de 7 2013Oc07

COMPANY NAME / NOM DE L'ENTREPRISE	JUR. NO. DATE	CITY / VILLE	EP TYPE	STATUS / STATUT	STAT. DATE / DATE EFF.
C HELPERT PROFESSIONAL	CD 109692716 2013Jl24			Prop.CANADA	
BY-TEK	AB OPT6971667 1996Jn05		Ptnrshp	Active	
BOOKS & BYTES INC	AB 0204181523 1990Al26	PEACE RIVER	Bus_Corp	Active	
THE BETTER BYTE SOFTWARE COMPANY LTD	AB 2010035554 2002Au20	RED DEER	Bus_Corp	Active	
C QUANTIFIED	CD 110170930 2013Se16			Prop.CANADA	
BYTEC MANAGEMENT CORPORATION INC	CD 0001580418 1983Oc27	NEPEAN	CBCA	Amlgmtg	1984Fe01
C. HERBERT MARKETING	AB 0CRY023437 1978Ma08		TradeName	Active	
CYBERTECH INDUSTRIAL SOFTWARE CORPORATION	AB 2011302441 2004Se30	EDMONTON	Bus_Corp	Active	2013Jn30
BITS AND BYTES INTERNATIONAL	CD 109593330 2013Jl12			Prop.CANADA	
C'EST POSSIBLE FONDATION DU DIABETE	CD 109309693 2013Jn10			Prop.CANADA	
COMPUTER BYTES	AB TN14844047 2009Au12		TradeName	Active	
PSIBYTE INC	AB 110203329 2013Se19			Prop.K.V.P.	
BYTEFORCE MEDIA INC	AB 2016636595 2012Mr07		Bus_Corp	Active	
THE LAST BYTE CONSULTANTS INC	CD 0001288415 1982Mr17	MONTREAL	CBCA	Active	
B.C. PAGE PROFESSIONAL CORPORATION	AB 2012715518 2006Se29	LAKE LOUISE	Bus_Corp	Active	
B2TEC SOFTWARE LTD	AB 2014340836 2008Oc24	EDMONTON	Bus_Corp	Active	
LYTE BYTE COMPUTER SALES	AB 0TN6310932 1994No02		TradeName	Active	

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Valid until / Valide jusqu'au 2014Ja05

NUANS® Name Search System
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DHA007 H=CM V=9,38,42



Alberta Reservation Report / Rapport pour réservation en Alberta

C-BYTE INC.
110347865 =C-BYTE=

Page 4 of/de 7 2013Oc07

COMPANY NAME / NOM DE L'ENTREPRISE			EP	TYPE	STATUS / STATUT	STAT. DATE / DATE EFF.
JUR. NO.	DATE	CITY / VILLE				
BUS. / ACT.						
C. SIVAKUMAR PROFESSIONAL CORPORATION					Prop.ACCUCA	
AB 108816796	2013AI15					
THE BETTY SHOPPE LTD				Bus_Corp	Historic	1958No10
AB 0200160299	1953Ma19					
NEXT BYTE CONSULTING INC				Bus_Corp	Active	
AB 0206704736	1995Oc03	DIDSBURY				
TAZABITZ COMPUTER CONSULTING INC				CBCA	Active	
CD 0003494128	1998Ma20	CARP				
BYTE-TECH COMPUTING SERVICES INC				Bus_Corp	Active	2013Ma06
AB 0207322504	1997Mr19	CALGARY				
SPYDER BYTE COMPUTERS				TradeName	Active	
AB 0TN7314784	1997Mr20					
C SIDE PHOTOGRAPHY				Ptnrshp	Active	
AB PT17224767	2013Ja08					
BYTES INTEGRATION INC				CBCA	Active	
CD 0006735703	2007Mr13	WATERLOO				
BITS AND BYTES COMPUTER CONSULTING				TradeName	Active	
AB 0CRY034440	1979Oc10					
C SQUARED TRADING AND ENTERPRISES					Prop.CANADA	
CD 109439198	2013Jn25					
BYTE CRAFT LIMITED				CBCA	Active	
CD 0000995029	1976Jl16	WATERLOO				
T.C. BOLT DISTRIBUTORS				TradeName	Active	
AB 0CRY062552	1982AI15					
C MIVILLE CONSULTING					Prop.CANADA	
CD 109148258	2013Ma22					
C PETE CONSULTING INC				Bus_Corp	Active	
AB 2013211129	2007Ma08	SHERWOOD PARK				
SAFE BET INC				Bus_Corp	Active	2013Jn21
AB 2015396696	2010Ma31	EDMONTON				
BYTEFOUR					Prop.CANADA	
CD 109554377	2013Jl08					
C MASSIE CONSULTING CORP					Prop.AMAALTA	
AB 109720415	2013Jl26					

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Valid until / Valide jusqu'au 2014Ja05

NUANS® Name Search System
Système de Recherche de Nom NUANS^{MD}

ARVICAL

DHA007 H=CM V=9,38,42



Trade-mark Report / Rapport des marques de commerce

110347865 C-BYTE
Classes: 9,38,42

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* This report does not constitute a Trade-mark reservation / Ce rapport ne constitue pas de réservation de marque de commerce

TRADE-MARK / MARQUE DE COMMERCE APP. NO. / NO. APP. GOODS / PRODUITS	REG. NO. / NO. ENR.	REG. DATE / DATE. ENR.	STATUS / STATUT	OWNER / PROPRIÉTAIRE CLASSES
BYTE 0407432 TMA235676 1979Se07 Printed publications namely a magazine. (2) Publications; specific>				UNITED BUSINESS MEDIA 16.
CBIT ; 1179772 TMA620293 2004Se22 Computer hardware, peripherals, software, namely, (a) software for>				GEORGE YUNG 01,09,33,35.
TRADE BYTES 0817437 TMA499939 1998Se01 Computer software and user manuals relating to import and export i>				TRADEBYTES DATA CORP., 09,35.
CBIT 0669398 TMA Computer software.Provision of tea>			Abandoned	AUDIOVISUAL PUBLISHERS 09,36,42;
BITEC 0700814 TMA426876 1994Ma06 Waterproofing membranes used in roofing, below grade waterproofing>				BITEC ROOFING OF CANAD 19,40.
BI-TEC 0715157 TMA428960 1994Jn17 Endoscopic forceps, and component parts and accessories therefor.				LINVATEC CORPORATION, 10,12.
BITEC 0743447 TMA479644 1997Au06 Biochemical catalysts, food additives for maturing and preserving >				FRUTAROM GERMANY GMBH 01.
Q-BIT 0782957 TMA460315 1996Jl19 Bulk seed containers.				SYNGENTA PARTICIPATION 20.
BYTE; 1017942 TMA563841 2002Jn20 Clothing, namely, belts, dresses, trousers, slacks, jeans, shirts,>				PAPILLON S.P.A., 18,25.
CREATIVE COMPUTER COMMUNICATIONS ; 1129243 TMA609505 2004Ma06 Telemarketing. (2) Photographic restoration.				LAUREEN JOHNSON, TRADI 35,40,
C'EST BON D'EN AVOIR PLUS / SO GOOD. SO 1155381 TMA586443 2003Au01 Services d'exploitation de magasins d'alimentation et epicerie.				LOBLAWS INC. 35,
C'EST BON DE PAYER MOINS / IT'S SO GOOD 1155383 TMA586494 2003Au04 Services d'exploitation de magasins d'alimentation et epicerie.				LOBLAWS INC. 35,
BYTECC (& ; 1444335 TMA796299 2011Al27 Hard disk drives ; computer data storage apparatus namely flash dr>				BYTECC INC. 09.
COMMUNITY BYTES 1550310 TMA837207 2012No28 Development, production and broadcasting of local and community ne>				ROGERS BROADCASTING LI 38,41,
BETTER BYTES 1248789 TMA665291 2006Ma30 Computer software for use in compiling a cookbook of recipes.				CONNECTIONS.DBD, A GEN 09.
TECHLIQUIDATORS A BEST BUY BRAND ; 1535136 TMA861052 2013Se24 Online retail store services featuring new, used and refurbished a>				BBY SOLUTIONS, INC. 35,
BITE ; 0809432 TMA517580 1999Oc05 Athletic shoes, spikes and cleats therefor, caps, t-shirts, knit s>				BITE, INC. 25.

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Trade-mark Report / Rapport des marques de commerce

110347865 C-BYTE

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Classes: 9,38,42

* This report does not constitute a Trade-mark reservation / Ce rapport ne constitue pas de réservation de marque de commerce

TRADE-MARK / MARQUE DE COMMERCE	OWNER / PROPRIÉTAIRE
APP. NO. / NO. APP. GOODS / PRODUITS	REG. NO. / NO. ENR. REG. DATE / DATE. ENR. STATUS / STATUT CLASSES
CBET 1117438 TMA Aband-36 Electronic devices for use in audience measurement, and in busines>	ARBITRON INC., 09,16,35,42.
C BRIGHT; 1135775 TMA637638 2005A118 Video projectors, prerecorded software programs for operating, con>	KONINKLIJKE PHILIPS EL 09.
EBET 1582363 TMA Def-Srchd Electronic or multimedia publications on recorded media (audio, vi>	EBET LIMITED 07,09,38,41.
X BYTES 1596310 TMA Searched Providing exercise programs, namely online, print and video delive>	EXERCISE BYTES INC. 24,28.
PRACTICEBYTES 1644853 TMA Formalizd Multimedia software for ongoing health and medical education (2) p>	ROGERS PUBLISHING LIM 09,16,35,38.
TCBY YOGURT 0534043 TMA340686 1988Ma20 Expunged Frozen yogurt, drinks made with frozen yogurt and snack and desser>	TCBY ENTERPRISES, INC. 30,32,43.
BYTEC ; 0658992 TMA Abandoned Bicycle parts, namely: brakes, handlebars, stems and pedals.	QUICKLY AG, 12.
CINE-BYTE 0851835 TMA507013 1999Ja25 Promotional items, namely, baseball caps, t-shirts, sweatshirts, g>	CINE-BYTE IMAGING INC. 16,21,25,35.
BYTE ME 1034605 TMA570616 2002No12 Magazine and newspaper articles sale, service and development of c>	BYTE-ME SOFTWARE INC. 35,42,
RAPTORBYTES 1047123 TMA572079 2002De11 Computer consulting services, namely website design and computer n>	RAPTORBYTES INC., 42,
RHINO BYTES PRESS 1058374 TMA559326 2002Mr18 Series of printed educational materials, namely critical thinking >	ERIC G. BONFIELD ALSO 16,41.
HEALTH BYTES ; 1064666 TMA571940 2002De09 Printed materials, namely, books, pamphlets, periodicals, all on t>	HEALTH BYTES PRODUCTIO 09,16,38,41.
FIRE FABRY INTERNATIONAL RESEARCH EXCHAN 1072938 TMA583839 2003Jn16 Administration of medical research in the field of fabry disease.	SHIRE HUMAN GENETIC TH 35,
C COMPLETE PURCHASING SERVICES INC. ; 1082539 TMA597597 2003De16 Printed publications, namely newsletters, purchasing binders, cale>	ARAMARK CANADA LTD./AR 16,35,41,43.
ORBYTE 1108587 TMA615173 2004Jl19 Computer software for use in developing, providing, managing and b>	SERVICE FACTORY SF AB, 09,42.
EDUBYTE 1111013 TMA655781 2005De22 A computer software program designed for use in the medical field >	BAXTER HEALTHCARE SA 09,42.
C'EST L'AVANTAGE DE JOUER A DOMICILE 1161718 TMA609154 2004Ma03 Educational, promotional and development program materials, namely>	GO FOR GREEN/VERT L'AC 16,35,41,42.

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Albert Canada NUANS Report outlined process

Monday, September 14, 2015
12:19 AM

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Alberta.ca > Service Alberta Home > Registries > Corporate Registry > Searches > Corporate and Business Name Reports (NUANS)

- Consumer Information
- Businesses/Charities
- Landlords/Tenants
- Registries
- Drivers/Vehicles
- Land Titles
- Vital Statistics
- Information/Technology
- Government Buying/Selling

Corporate and Business Name Reports (NUANS)

- Charitable Organizations
- Corporate Registry
- How to Incorporate/Register a Business or Non-Profit Body
- Dissolve or Revive a Legal Entity
- Searches

Corporate and Business Name Reports (NUANS)

- New West Partnership Trade Agreement (NWP/TA)
- Obligations and Responsibilities After Incorporation or Registration
- Service Providers
- Common Questions - Corporate Registry
- Forms - Corporate Registry

Click on one of the links below to learn more about NUANS reports:

- What is a NUANS report?
- How can I obtain a NUANS report?

What is a NUANS report?

A NUANS (Newly Upgraded Automated Name Search) search is a comprehensive search that compares a proposed Alberta or extra-provincial corporation name or a proposed non-profit name to a database of Alberta and federal corporation names.

- The person who ordered the report uses it to decide whether they should proceed with their proposed name for an Alberta or extra-provincial corporation.
- In the case of a non-profit organization, Corporate Registry will examine the report to decide whether or not the proposed name can be used in Alberta.
- In most cases, a NUANS report is required for incorporation, amalgamation, name change, or revival of an Alberta corporation or non-profit organization and for registration, amalgamation, name change, and reinstatement of an extra-provincial corporation.
- The following situations do not require a NUANS report:
 - When the proposed name is a 'number name' for an Alberta or extra-provincial corporation.
 - When the proposed name is for a federal (Canada) corporation that is extra-provincially registering in Alberta.
 - When the proposed name is for an Alberta corporation that is reviving within three years of its dissolution.
- The NUANS report reserves the proposed name for 90 days. The complete report, whether an original or fax copy, must be submitted with the incorporation/registration details and must be less than 91 days old.
- Another type of report, the Business Name Report, focuses on Alberta partnership and trade names (business names) and does not reserve the proposed business name. Corporate Registry recommends this report be purchased and reviewed prior to registration of a business name.

UDRP EXHIBIT H
PAGE 8 OF 12 PAGES
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C-BYTE INC.
110347865 =C-BYTE=

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TERMS AND CONDITIONS

Definitions:

'Customer' refers to a person, firm or other entity who receives a NUANS Report directly or indirectly from HP pursuant to a written agreement with HP, or who relies on such Report without the benefit of any written agreement with HP.

"HP" shall at all times refer to Hewlett-Packard (Canada) Co.

(a) There are no representations or warranties, expressed or implied, oral or written, in fact or by operation of law or otherwise, except as herein expressly stated. In no event shall HP be liable for any indirect, special or consequential damages for any reason whatsoever including any damages arising out of Customer's access to or use of services, data or reports provided under the Agreement between the Customer and HP, including responsibility or liability resulting from the inaccuracy and/or omissions of NUANS Reports or NUANS Database Pre-Searches.

(b) HP'S liability for direct damages resulting from HP'S negligence or breach of contract in the execution of services (including delivery of data and reports) under its Agreement with the Customer shall be limited to the total charge for the services giving rise to the loss or damage.

(c) Where a Customer is required to re-order a NUANS Report because the Customer did not receive the first report or because of a demonstrable omission or inaccuracy therein, HP'S sole liability in the case of non-receipt by Customer shall be to waive all charges with respect thereto, provided that in all such cases HP shall not be liable for any failure in the case of an Act of God, riots, insurrection, or any other event beyond HP'S direct control, and provided in all cases that the Customer provide HP with satisfactory evidence of one of the above-mentioned failures within fifteen (15) days of the alleged date of such failure.

(d) The Customer agrees to indemnify HP and to hold it harmless from any loss or liability to the Customer, or to any third parties for any injuries or damages not caused by HP'S negligence which result from the Customer's access to or use of any such report or data and operation of any machines in the control of HP, from the Customer's use of HP'S premises or premises which HP is authorized to use, or from any error or inaccuracy in the preparation and formulation of a request for a NUANS Report.

(e) The Customer acknowledges that HP is subject to certain time and other restrictions in compiling its data base for purposes of delivering a NUANS Report or a NUANS Database Pre-Search and the Customer shall so advise any third party to whom it disseminates such Report or Pre-Search. HP shall not be held liable by the Customer or by any third party for the failure of a NUANS Report or a NUANS Database Pre-Search to disclose any name with prior rights. HP expressly excludes all liability and damages resulting from the inaccuracy or incompleteness of, or omissions from, any NUANS Report.

CONDITIONS GÉNÉRALES

Définitions:

On entend par « client » une personne, une entreprise ou toute autre entité qui reçoit directement ou indirectement de HP un rapport NUANS en conformité avec une entente écrite avec HP, ou qui compte sur un tel rapport sans avoir conclu d'entente écrite avec HP.

Le terme « HP » fait toujours référence à Hewlett-Packard (Canada) Cie

(a) Sauf mention contraire dans le présent contrat, HP ne reconnaît aucune représentation ni garantie expresse ou implicite, verbale ou écrite, dans les faits ou par l'effet de la loi ou de toute autre disposition. HP ne peut en aucun cas être tenue responsable de dommages spéciaux, indirects ou accessoires, dont les dommages résultants de l'obtention ou de l'utilisation par le client des données, rapports ou services fournis en vertu des présentes, y compris toute responsabilité découlant d'inexactitudes ou d'omissions dans les rapports NUANS ou dans les rapports de recherche préliminaire NUANS.

(b) La responsabilité de HP pour tout dommage direct résultant de la négligence de HP ou de la violation du contrat dans l'exécution des services (y compris la fourniture de données et de rapports) en vertu des présentes sera limitée au montant total des frais exigés pour les services qui ont donné lieu à la perte ou au dommage.

(c) Si le client est obligé de redemander un rapport NUANS parce que HP a omis de produire le premier rapport selon ses obligations, la seule responsabilité de HP consistera à renoncer à tous les frais associés à cette demande, à condition que HP soit exemptée de toute responsabilité si le manquement est dû à un cas de force majeure, à des émeutes, à des insurrections ou à toute autre cause indépendante de la volonté de HP; par ailleurs, le client sera aussi tenu de fournir à HP des pièces justificatives satisfaisantes d'un tel manquement dans un délai de quinze (15) jours suivant la date prétendue de chaque manquement.

(d) Le client convient d'indemniser HP et de le dégager de toute responsabilité découlant d'une perte ou d'une obligation pour le client ou une tierce partie en raison de blessures ou de dommages qui ne résultent pas de la négligence de HP, mais plutôt du fait que le client a obtenu et utilisé le rapport ou les données et a fait fonctionner de l'équipement sous le contrôle de HP, qu'il a utilisé les locaux de HP ou des locaux que HP est autorisée à utiliser, ou qu'une erreur ou une inexactitude s'est glissée dans la préparation ou la formulation d'une demande de rapport NUANS.

(e) Le client reconnaît que HP est soumise à certaines restrictions liées au temps et à d'autres facteurs lorsqu'elle compile sa base de données en vue de produire un rapport NUANS ou un rapport de recherche préliminaire NUANS et il devra donc en prévenir toute tierce partie à qui il transmet le rapport NUANS ou le rapport de recherche préliminaire NUANS. HP ne peut être tenue responsable par le client ou toute tierce partie en cas d'omission de divulgation dans le rapport NUANS ou le rapport de recherche préliminaire NUANS de toute dénomination et remarque de commerce avec droit prioritaire. HP décline expressément toute responsabilité découlant d'inexactitudes ou d'omissions dans le rapport NUANS.

Abbreviation/Abréviation	English Term	Terme français	Abbreviation/Abréviation	English Term	Terme français
	Company Name	Nom de l'entreprise		Trade-mark	Marque de commerce
Jur.	Jurisdiction Code	Code de juridiction	App.No./No.app.	Application Number	Numéro d'application
No.	Company Number	Numéro de l'entreprise	Reg.No./No.enr.	Registration Number	Numéro d'enregistrement
Date	Incorporation Date	Date d'incorporation	Reg.Date/Date.enr	Registration Date	Date d'enregistrement
	City	Ville		Status	Statut
EP	Extra-Provincial Code	Code extra-provincial		Owner name	Propriétaire
Type	Company Type	Type de l'entreprise	Classes	Nice Class Codes	Codes des classes Nice
Status/Statut	Legal Status	Statut légal	Goods/Produits	Goods and Services	Produits et services
Stat Date/Date eff	Status Date	Date effective			
Bus./Act.	Line of Business	Secteur d'activité			

Latest NUANS update dates / Dernière mise à jour de NUANS

AB Bus. 2013Se30 AB Corp. 2013Se30 CD 2013Oc02 OSFI 2011Oc21
TM Update/Mise à jour des MC 2013Oc01 App. No./No. App. 1645200 Filed/Déposée 2013Se25

Report Terminology

In reading the report you will note at the top of the page is a "?" followed by a name, a number over the word Alberta, and page number over a date. This line denotes the name of the search, the reservation number, the jurisdiction, and the date of the search. The number is the accession number assigned by the main computer. This number denotes the order of the requests. The lowest number has first right to the name.

All search houses in Canada use the same central computer. Once all the requests for the day have been entered on the system the search process is closed for new requests and the search begins.

One of the first matches that is found is the identical name as searched. You will note that the identifying number of the first match, with the addition of the "AB" to denote Alberta, is the same as the reservation number. Below this number is the abbreviation PROP.ARVIC, which identifies ARVIC as the search house that has proposed this name. This process creates a clear audit trail to insure that later searches for the same name will produce occurrences of this subject name, the date of the search and the reservation number.

Please note the one working day difference in the date of the name was proposed and the date of the match of the same name. This date difference assures you that the data base was closed after the proposed name was entered and before the search was processes and guarantees that your report contains a complete list of all names that have been submitted to the data base up to the close of business on the first date.

Trademarks Section

The last two pages of the Alberta NUANS report contain lists of registered and pending Trade Marks which, although not protected by Provincial law, may be the single biggest reason for the rejection of a Corporate name.

We read each of the names on the first four pages and underline in red any name that we feel may be in violation of the rules noted earlier. If we think that a name may be confusing, then others may also. The searcher's main job is to alert the incorporator to the possibility that there may be a potential conflict. The incorporator should also review the report for additional conflicts based on his knowledge of the activities of the new business.

There does exist a whole series of "laudatory" terms used for corporate names. This list includes the words; holdings, industries, resources, manufacturing, construction, enterprises, investments, management, consulting, etc. These names will become your single biggest problem as you never know what the nature of work of these corporations will be, however, if the name is not identical to an existing name or the abbreviated version of an existing name, the name may be used.

For this reason you will find a long list of companies that use the same word in front of each of the above. They all exist in harmony as they are all considered to be without defined meaning, and therefore the owners are charged with the responsibility of insuring that they do not infringe on the rights of any of the others with the same list of laudatory terms.

The term NUANS stands for Newly Updated Automated Name Search.

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- 3. A society must contain the legal element somewhere in the society's name, however, it does not have to be at the end. Society legal elements include Society, Club, Association, foundation, or Group. The Registrar can give permission for the use of other names, however this is rare.
- 4. If a company is currently active you cannot form a new company by changing only the legal element, abbreviating some word, adding a homonym or phonetic similarity, or adding the current year in brackets unless you obtain and file written consents from the offended company.
- 5. No corporation shall have a name that is;
 - too general,
 - is only descriptive of the products sold,
 - is primarily or only the name of an individual other that when used as part of the name of a Professional Corporation.
 - consists primarily or only of a geographic name, unless the name has, through use, acquired a meaning that renders the name distinctive.
- 6. No corporate name shall be longer than 70 characters in length, including spaces and punctuation marks.
- 7. The first character of a corporate name must be an Arabic numeral or an alphabetic letter.
- 8. No corporation shall have a year in brackets unless the corporation is a successor company and the year denotes the year of succession.
- 9. No corporation can have a name that denotes some form of:
 - governmental, royal or vice-regal approval or authority unless it in fact, has such authority or approval,
 - sponsorship by some school, college, or university, or sponsorship or control by any government or government department or agency in Canada or any of the provinces,
 - carries on the business of a bank, loan company, trust company, insurance company, trust company, stock exchange, or other financial institution that is regulated by Federal legislation,
 - is affiliated with the Olympic games or its organizing committee,
 - the operation of Kananaskis Provincial park, unless such names have the written consent of the governing authority.
- 10. No corporation can use the phrase "Professional Corporation" unless the users of the corporation are members of a Professional Society governed by a Provincial Act and are authorized to form Professional Corporations.

EXAMINATION OF THE NUANS REPORT

We can supply NUANS reports for all of Canada, however, we can not reserve names as part of the searches for B.C. or Quebec. We can reserve names in these provinces by submitting written requests, with payment enclosed.

The Alberta NUANS report consists of 6 pages.

- The first 4 are a mixture of;
 - existing, reserved or proposed Alberta corporate names;
 - existing, reserved or proposed Federal companies as they have the right to use their names in Alberta, & Alberta trade names.
- The last two pages contain summary information about trademarks.

The report does not contain a search of names of companies that are incorporated in other province and does not guarantee that the



Corporate Registry Services and Trade Mark Agents

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NUANS Report opinion letters

The examination of proposed names, and our comments as a search house, are critical to the establishment of our reputation. It is critical that you understand that neither the Governing Jurisdiction nor this search house providing a NUANS report approves or rejects the use of new names for new corporations. This responsibility rests solely on the shoulders of the Incorporator. Our job is to assist the incorporator in making this decision by bringing to his or her attention any problems that we see in the hope that lawsuits might be avoided.

The Government acts as a Registry responsible for recording everything that the incorporator asks for. Disputes are not the responsibility of the Government, however, the Government will act as a instigator if a complaint is filed.

The searcher is not required to know the law as a lawyer might, but rather advise the lawyer that certain names might cause him problems at some future date and therefore he should look more closely before he decides to use the name.

In a review of The Business Corporations Act dictates what constitutes bad names without making reference to what is good. Section 12 prohibits the use of a name when;

1. 12(1) The name shall not be identical to any name that is;
 - a. currently on the Registry.
 - b. reserved for future use.
 - c. prohibited by the Regulations.
2. 12(2) The name is disapproved by the Registrar because the name;
 - a. is objectionable. The name is vulgar or immoral to you, the reader.
 - b. is likely to mislead or confuse.

UDRP EXHIBIT H
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This statement causes the most problems as someone other than the Registrar is charged with the responsibility of determining if the name is confusing. The normal test that we apply is "What does the name really say" and "How do the two names stand beside each other"?

If you saw the two names beside each other would you be able to determine the nature of work of each without being confused. Would you assume that the two businesses offered the same services or that the services of one were the services of the other. Would you assume that the businesses are somehow related or of the some owners.

- c. is similar to an existing name.

The test here is the same as the one above. As an example of the above "Hair by James" is the same as "James Hair Salon".

There are however, exceptions to the above. The common exception is the written consent to the user of the offending name from the first user of the name. In the example above these two names could exist beside each other if the owner of the first business gave consent to the owner of the other.

In addition to the Act there exists a set of Regulations that govern how the act is to be interpreted.

Here are some rules to follow;

1. Alberta corporations can contain any letter or character that can be produced by a typewriter including punctuation marks, however, the addition of punctuation marks is not sufficient to distinguish one name from another.
2. All incorporated companies must contain an acceptable legal element that always ends the name of the company. The legal elements are Limited, Incorporated, and Corporation. Also acceptable are the abbreviations of these words and the French

To: Trevor Biscope (rich@newmanlawlv.com)
Subject: U.S. TRADEMARK APPLICATION NO. 86571855 - VEGAS.SEX - 10141.00003
Sent: 6/24/2015 7:58:10 PM
Sent As: ECOM116@USPTO.GOV
Attachments: [Attachment - 1](#)
[Attachment - 2](#)
[Attachment - 3](#)
[Attachment - 4](#)
[Attachment - 5](#)
[Attachment - 6](#)
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[Attachment - 22](#)
[Attachment - 23](#)
[Attachment - 24](#)
[Attachment - 25](#)

UNITED STATES PATENT AND TRADEMARK OFFICE (USPTO)
OFFICE ACTION (OFFICIAL LETTER) ABOUT APPLICANT'S TRADEMARK APPLICATION

U.S. APPLICATION SERIAL NO. 86571855

MARK: VEGAS.SEX

86571855

CORRESPONDENT ADDRESS:

RICHARD H NEWMAN
Newman Law Llc
365 Pilot Rd Ste D
Las Vegas, NV 89119-3516

CLICK HERE TO RESPOND TO THIS I
<http://www.uspto.gov/trademarks/teas/response>

[VIEW YOUR APPLICATION FILE](#)

APPLICANT: Trevor Biscope

CORRESPONDENT'S REFERENCE/DOCKET NO :

10141.00003

CORRESPONDENT E-MAIL ADDRESS:

rich@newmanlawlv.com

OFFICE ACTION

STRICT DEADLINE TO RESPOND TO THIS LETTER

TO AVOID ABANDONMENT OF APPLICANT'S TRADEMARK APPLICATION, THE USPTO MUST RECEIVE APPLICANT'S COMPLETE RESPONSE TO THIS LETTER **WITHIN 6 MONTHS** OF THE ISSUE/MAILING DATE BELOW.

ISSUE/MAILING DATE: 6/24/2015

The referenced application has been reviewed by the assigned trademark examining attorney. Applicant must respond timely and completely to the issue(s) below. 15 U.S.C. §1062(b); 37 C.F.R. §§2.62(a), 2.65(a); TMEP §§711, 718.03.

SUMMARY OF ISSUES that applicant must address:

- Section 2(d) Refusal – Likelihood of Confusion
- Section 2(e)(2) Refusal – Primarily Geographically Descriptive
- Information Inquiry
- Supplemental Register (Advisory)
- Identification of Services
- Multi-Class Application Requirements (Advisory)

SECTION 2(d) REFUSAL – LIKELIHOOD OF CONFUSION

Registration of the applied-for mark is refused because of a likelihood of confusion with the marks in U.S. Registration Nos. 3182943 ("VEGAS.COM"), 3629770 ("VEGAS.COM"), 3173474 ("VEGAS.COM"), 3200635 ("VEGAS.COM"), 3129209 ("VEGAS.COM"), 3311739 ("VEGAS.COM"), and 3129210 ("VEGAS.COM"). Trademark Act Section 2(d), 15 U.S.C. §1052(d); see TMEP §§1207.01 *et seq.* See the enclosed registrations.

Trademark Act Section 2(d) bars registration of an applied-for mark that so resembles a registered mark that it is likely a potential consumer would be confused, mistaken, or deceived as to the source of the services of the applicant and registrant. See 15 U.S.C. §1052(d). A determination of likelihood of confusion under Section 2(d) is made on a case-by case basis and the factors set forth in *In re E. I. du Pont de Nemours & Co.*, 476 F.2d 1357, 177 USPQ 563 (C.C.P.A. 1973) aid in this determination. *Citigroup Inc. v. Capital City Bank Grp., Inc.*, 637 F.3d 1344, 1349, 98 USPQ2d 1253, 1256 (Fed. Cir. 2011) (citing

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In this case, the following factors are the most relevant: similarity of the marks, similarity and nature of the services, and similarity of the trade channels of the services. See *In re Viterra Inc.*, 671 F.3d 1358, 1361-62, 101 USPQ2d 1905, 1908 (Fed. Cir. 2012); *In re Dakin's Miniatures Inc.*, 59 USPQ2d 1593, 1595-96 (TTAB 1999); TMEP §1207.01 *et seq.*

Comparison of the Services

When analyzing an applicant's and registrant's services for similarity and relatedness, that determination is based on the description of the services stated in the application and registration at issue, not on extrinsic evidence of actual use. See *Octocom Sys. Inc. v. Hous. Computers Servs. Inc.*, 918 F.2d 937, 942, 16 USPQ2d 1783, 1787 (Fed. Cir. 1990); see also *Hewlett-Packard Co. v. Packard Press Inc.*, 281 F.3d 1261, 1267, 62 USPQ2d 1001, 1004 (Fed. Cir. 2002).

Absent restrictions in an application and/or registration, the identified services are presumed to travel in the same channels of trade to the same class of purchasers. *Citigroup Inc. v. Capital City Bank Grp., Inc.*, 637 F.3d 1344, 1356, 98 USPQ2d 1253, 1261 (Fed. Cir. 2011); *Hewlett-Packard Co. v. Packard Press Inc.*, 281 F.3d at 1268, 62 USPQ2d at 1005. Additionally, unrestricted and broad identifications are presumed to encompass all services of the type described. See *In re Jump Designs*, 80 USPQ2d 1370, 1374 (TTAB 2006); *In re Linkvest S.A.*, 24 USPQ2d 1716, 1716 (TTAB 1992).

In this case, the identifications set forth in the application and registrations are identical as to providing bookings and reservations for temporary lodging and have no restrictions as to nature, type, channels of trade, or classes of purchasers. Therefore, it is presumed that these services travel in all normal channels of trade, and are available to the same class of purchasers. See *Midwestern Pet Foods, Inc. v. Societe des Produits Nestle S.A.*, 685 F.3d 1046, 1053, 103 USPQ2d 1435, 1440 (Fed. Cir. 2012). Accordingly, the services of applicant and the registrant are considered related for purposes of the likelihood of confusion analysis.

Additionally, the identification of services in applicant's application is broad enough to encompass registrant's services. For example, "providing booking and reservation services over global communication networks" is broad enough to include such services for transportation sporting, cultural or entertainment events, which are identified in the cited registrations.

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Marks are compared in their entireties for similarities in appearance, sound, connotation, and commercial impression. *Stone Lion Capital Partners, LP v. Lion Capital LLP*, 746 F.3d 1317, 1321, 110 USPQ2d 1157, 1160 (Fed. Cir. 2014) (quoting *Palm Bay Imps., Inc. v. Veuve Clicquot Ponsardin Maison Fondée En 1772*, 396 F.3d 1369, 1371, 73 USPQ2d 1689, 1691 (Fed. Cir. 2005)); TMEP §1207.01(b)-(v). "Similarity in any one of these elements may be sufficient to find the marks confusingly similar." *In re Davia*, 110 USPQ2d 1810, 1812 (TTAB 2014) (citing *In re White Swan Ltd.*, 8 USPQ2d 1534, 1535 (TTAB 1988); *In re 1st USA Realty Prof'ls, Inc.*, 84 USPQ2d 1581, 1586 (TTAB 2007)); TMEP §1207.01(b).

Applicant seeks registration of "VEGAS.SEX". Registrant's marks are "VEGAS.COM" (some with designs).

The term "VEGAS" is the "informal name for Las Vegas". See attached definition.

The designation ".SEX" is a "delegated TLD in ICANN's New gTLD Program." See attached excerpt from icannwiki.com. Similarly, the designation ".COM" is "one of the first TLDs to be used on the Internet's Domain Name System." See attached excerpt from icannwiki.com. In short, both parties marks are a coupling of the term "VEGAS" with a top level domain, in this case, ".COM" versus ".SEX".

Top-level domains (TLDs), such as ".com" and ".net," are generic locators for Internet website addresses and provide no meaningful source-identifying significance. See *Apple Computer v. TNET.net, Inc.*, 90 USPQ2d 1393, 1397 (TTAB 2007); TMEP §§1215.01, 1215.02, 1215.09; cf. *In re Hotels.com, L.P.*, 573 F.3d 1300, 1301, 1304, 91 USPQ2d 1532, 1533, 1535 (Fed. Cir. 2009). Thus, a non-source-identifying gTLD is less significant in creating a commercial impression in the minds of consumers, and is generally given little weight when comparing marks. See TMEP §1215.09.

Some of the cited registrations contain a design element. For a composite mark containing both words and a design, the word portion may be more likely to be impressed upon a purchaser's memory and to be used when requesting the goods and/or services. *Joel Gott Wines, LLC v. Rehoboth Von Gott, Inc.*, 107 USPQ2d 1424, 1431 (TTAB 2013) (citing *In re Dakin's Miniatures, Inc.*, 59 USPQ2d 1593, 1596 (TTAB 1999)); TMEP §1207.01(c)(ii); see *In re Viterra Inc.*, 671 F.3d 1358, 1362, 101 USPQ2d 1905, 1908, 1911 (Fed. Cir. 2012) (citing *CBS Inc. v. Morrow*, 708 F.2d 1579, 1581-82, 218 USPQ 198, 200 (Fed. Cir. 1983)). Thus, although such marks must be compared in their entirety, the word portion is often considered the dominant feature and is accorded greater weight in determining whether marks are confusingly similar, even where the word portion has been disclaimed. *In re Viterra Inc.*, 671 F.3d at 1366, 101 USPQ2d at 1911 (Fed. Cir. 2012) (citing *Giant Food, Inc. v. Nation's Foodservice, Inc.*, 710 F.2d 1565, 1570-71, 218 USPQ2d 390, 395 (Fed. Cir. 1983)).

In any event, applicant's mark is in standard characters. A mark in typed or standard characters may be displayed in any lettering style; the rights reside in the wording or other literal element and not in any particular display or rendition. See *In re Viterra Inc.*, 671 F.3d 1358, 1363, 101 USPQ2d 1905, 1909 (Fed. Cir. 2012); *In re Mighty Leaf Tea*, 601 F.3d 1342, 1348, 94 USPQ2d 1257, 1260 (Fed. Cir. 2010); 37 C.F.R. §2.52(a); TMEP §1207.01(c)(iii). Thus, applicant's mark could encompass the identical design element as present in the cited registrations. See, e.g., *In re Viterra Inc.*, 671 F.3d at 1363, 101 USPQ2d at 1909; *Squirtco v. Tomy Corp.*, 697 F.2d 1038, 1041, 216 USPQ 937, 939 (Fed. Cir. 1983) (stating that "the argument concerning a difference in type style is not viable where one party asserts rights in no particular display").

SECTION 2(e)(2) REFUSAL – PRIMARILY GEOGRAPHICALLY DESCRIPTIVE

Registration is refused because the applied-for mark is primarily geographically descriptive of the origin of applicant's services. Trademark Act Section 2(e)(2), 15 U.S.C. §1052(e)(2); see TMEP §§1210, 1210.01(a).

A mark is primarily geographically descriptive when the following is demonstrated:

- (1) The primary significance of the mark is a generally known geographic place or location;

(2) The goods and/or services for which applicant seeks registration originate in the geographic place identified in the mark; and

(3) Purchasers would be likely to make a goods-place or services-place association; that is, purchasers would be likely to believe that the goods and/or services originate in the geographic place identified in the mark.

TMEP §1210.01(a); *see In re Societe Generale des Eaux Minerales de Vittel S.A.*, 824 F.2d 957, 959, 3 USPQ2d 1450, 1452 (Fed. Cir. 1987); *In re Hollywood Lawyers Online*, 110 USPQ2d 1852, 1853 (TTAB 2014).

The primary significance of the mark is a generally known geographic place or location. The attached evidence establishes that the term "VEGAS" is an informal name for Las Vegas, Nevada. *See* attached. Commonly used nicknames for geographic locations are generally treated as equivalent to the proper geographic name of the place identified. TMEP §1210.02(a); *see, e.g., In re Carolina Apparel*, 48 USPQ2d 1542, 1543 (TTAB 1998) (holding CAROLINA APPAREL primarily geographically descriptive of retail clothing store services where evidence showed that "Carolina" is used to indicate either the state of North Carolina or South Carolina); *In re Charles S. Loeb Pipes, Inc.*, 190 USPQ 238, 245 (TTAB 1976) (holding OLD DOMINION is "the accepted nickname for the State of Virginia").

The services for which applicant seeks registration originate in the geographic place identified in the mark, namely, Las Vegas, Nevada. As indicated in the application, applicant is located in Las Vegas, Nevada. Additionally, the specimens demonstrate that applicant is "based in" Las Vegas and that the services are specifically directed to that city. *See* specimens.

When there is no genuine issue that the geographical significance of a term is its primary significance, and the geographical place is neither obscure nor remote, a public association of the services with the place is presumed if an applicant's services originate in the place named in the mark. TMEP §1210.04; *see, e.g., In re Cal. Pizza Kitchen Inc.*, 10 USPQ2d 1704, 1706 (TTAB 1988) (holding CALIFORNIA PIZZA KITCHEN primarily geographically descriptive of restaurant services rendered in California); *In re Handler Fenton Ws., Inc.*, 214 USPQ 848, 849-50 (TTAB 1982) (holding DENVER WESTERNS primarily geographically descriptive of western-style shirts originating in Denver).

As noted above, the non-source-identifying top-level domain (TLD) merely indicates an Internet address. *See, e.g., In re 1800Mattress.com IP LLC*, 586 F.3d 1359, 1364, 92 USPQ2d 1682, 1685 (Fed. Cir. 2009); *In re Hotels.com, L.P.*, 573 F.3d 1300, 1301, 1304, 91 USPQ2d 1532, 1533, 1535 (Fed. Cir. 2009); *In re Oppedahl & Larsen LLP*, 373 F.3d 1171, 1175-77, 71 USPQ2d 1370, 1373-74 (Fed. Cir. 2004); *see also* TMEP §§1209.03(m), 1215.01.

Furthermore, the addition of the top level domain ".SEX" does not obviate a determination of geographic descriptiveness because this term has no service mark significance. *See, e.g., In re Oppedahl & Larsen LLP*, 373 F.3d 1171, 71 USPQ2d 1370, 1373-1374 (Fed. Cir. 2004); *Interactive Products Corp. v. a2z Mobile Office Solutions, Inc.*, 66 USPQ2d 1321, 1322 (6th Cir. 2003) citing *Panavision Int'l, L.P. v. Toepfen*, 141 F.3d 1316, 1318-1319, 46 USPQ2d 1511, 1513 (9th Cir. 1998); *In re CyberFinancial.Net, Inc.*, 65 USPQ2d 1789 (TTAB 2002); *In re Martin Container, Inc.*, 65 USPQ2d 1058 (TTAB 2002); TMEP §§1215 et seq.

INFORMATION INQUIRY

To: Trevor Biscope (rich@newmanlawlv.com)
Subject: U.S. TRADEMARK APPLICATION NO. 86571865 - VEGAS.XXX - 10141.00004
Sent: 6/24/2015 7:57:10 PM
Sent As: ECOM116@USPTO.GOV
Attachments: [Attachment - 1](#)
[Attachment - 2](#)
[Attachment - 3](#)
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**UNITED STATES PATENT AND TRADEMARK OFFICE (USPTO)
OFFICE ACTION (OFFICIAL LETTER) ABOUT APPLICANT'S TRADEMARK APPLICATION**

U.S. APPLICATION SERIAL NO. 86571865

MARK: VEGAS.XXX

86571865

CORRESPONDENT ADDRESS:

RICHARD H NEWMAN
Newman Law Llc
365 Pilot Rd Ste D
Las Vegas, NV 89119-3516

CLICK HERE TO RESPOND TO THIS I
<http://www.uspto.gov/trademarks/teas/response>

[VIEW YOUR APPLICATION FILE](#)

APPLICANT: Trevor Biscope

CORRESPONDENT'S REFERENCE/DOCKET NO :

10141.00004

CORRESPONDENT E-MAIL ADDRESS:

rich@newmanlawlv.com

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INFORMATION INQUIRY

From: TMOfficialNotices@USPTO.GOV
Sent: Tuesday, August 18, 2015 00:33 AM
To: rich@newmanlawtv.com
Subject: Official USPTO Notice of Publication Confirmation: U.S. Trademark SN 86571876: C-BYTE: Docket/Reference No. 10141.00005

TRADEMARK OFFICIAL GAZETTE PUBLICATION CONFIRMATION

U.S. Serial Number: 86571876
Mark: C-BYTE
International Class(es): 042
Owner: Trevor Biscope
Docket/Reference Number: 10141.00005

The mark identified above has been published in the Trademark Official Gazette (TMOG) on Aug 18, 2015.

To Review the Mark in the TMOG:

Click on the following link or paste the URL into an Internet browser: <https://tmoq.uspto.gov/#issueDate=2015-08-18&serialNumber=86571876>

On the publication date or shortly thereafter, the applicant should carefully review the information that appears in the TMOG for accuracy. If any information is incorrect due to USPTO error, the applicant should immediately email the requested correction to TMPostPubQuery@uspto.gov. For applicant corrections or amendments after publication, please file a post publication amendment using the form available at <http://teasroa.uspto.gov/ppaf>. For general information about this notice, please contact the Trademark Assistance Center at 1-800-786-9199.

Significance of Publication for Opposition:

- * Any party who believes it will be damaged by the registration of the mark may file a notice of opposition (or extension of time therefor) with the Trademark Trial and Appeal Board. If no party files an opposition or extension request within thirty (30) days after the publication date, then eleven (11) weeks after the publication date a certificate of registration should issue.

To check the status of the application, go to http://tsdr.uspto.gov/#caseNumber=86571876&caseType=SERIAL_NO&searchType=statusSearch or contact the Trademark Assistance Center at 1-800-786-9199. Please check the status of the application at least every three (3) months after the application filing date.

To view this notice and other documents for this application on-line, go to http://tsdr.uspto.gov/#caseNumber=86571876&caseType=SERIAL_NO&searchType=documentSearch. NOTE: This notice will only become available on-line the next business day after receipt of this e-mail.



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CDRP EXHIBIT 5
 PAGE 12 OF 17 PAGES
 C-BYTE.CLUB

Displaying all 5 trademarks
 Sorted By relevance

Search the Entire Federal Trademark Database - Free!

Trademark	Owner	Serial Number	Reg. Number	Filing Date	Class(es)	View Item Status
VEGAS-AQUA	Time2Bioscope	86571837	Pending	March 20, 2015	043	LIVE
VEGAS-EXA	Time2Bioscope	86571843	Pending	March 20, 2015	043	LIVE
VEGAS-LUX	Time2Bioscope	86571865	Pending	March 20, 2015	043	LIVE
VEGAS-LOX	Time2Bioscope	86571865	Pending	March 20, 2015	043	LIVE
C-BYTE	Time2Bioscope	86571875	Pending	March 20, 2015	042	LIVE

Start Your Trademark Now
 Apply Online or Call (800) 294-0285

Narrow Results
 Class: 043
 Live/Dead: 5
 Goods/Services: 5
 clear all

Search Tools
 Save this search
 View saved searches
 Trademark Alerts
 International Monitoring

Company
 Time2Bioscope

File a Trademark
 Trademark Alerts
 Trademark Research
 Search Tools & Services Categories
 Trademark Registration Process

Additional Services
 Additional Research Databases
 Helpful Resources

Navigation: Home, Trademark Database, File a Trademark, Help

UDRP 2015 | Trademarks > Search > Trademark Search

Trademark Status & Document Retrieval (TSDR)

SEARCH MULTI-SEARCH

US Serial No. **4433387; 4433388; 4433389; 4433390**

Registration Certificates

4 Cases Found

Filter Results

Image	Mark	Ser. No.	Reg. No.	Status	Filing	Owner	Class(es)	Goods and Services
	VEGAS ADULT	8627807	none	live	2015-03-20	Trevor Bazzani	043	Providing travel lodging information over
	VEGAS PORN	8627803	none	live	2015-03-20	Trevor Bazzani	043	Providing travel lodging information over
	VEGAS SEX	8627805	none	live	2015-03-20	Trevor Bazzani	043	Providing travel lodging information over
	VEGAS XXX	8627806	none	live	2015-03-20	Trevor Bazzani	043	Providing travel lodging information over

Image Mark Ser. No. Reg. No. Status Filing Owner Class(es) Goods and Services

- Accessibility
- Privacy Policy
- Terms of Use
- Security

- Federal Acquisition Regulation (FAR) Act
- Notification and Federal Employee Antidiscrimination and Retaliation (DFARS) Act

- Freedom of Information Act (FOIA)
- Government of Commerce Help/2: Act Report
- Registration

- Strategy Targeting Organized Privacy (STORP)
- Information Quality Guidelines
- Department of Commerce

STATUS
DOCUMENTS 2
Download Print Preview

Generated on: This page was generated by TSDR on 2015-09-26 01:13:40 EDT

Mark: VEGAS.XXX

VEGAS.XXX

US Serial Number: 86571865

Application Filing Date: Mar 20 2015

Filed as TEAS RF: Yes Currently TEAS RF: Yes

Register: Principal

Mark Type: Service Mark

Status: A non-final Office action has been sent (issued) to the applicant. This is a letter from the examining attorney, requiring additional information and/or making an initial refusal. The applicant must respond to this Office action. To view all documents in this file, click on the Trademark Document Retrieval link at the top of this page.

Status Date: Jun 24 2015

- Mark Information
- Goods and Services
- Basis Information (Case Level)
- Current Owner(s) Information
- Attorney/Correspondence Information
- Prosecution History
- TM Staff and Location Information
- Assignment Abstract Of Title Information - Click to Load
- Proceedings - Click to Load

Expand All

Owner Name: Trevor Escobar

Owner Address: 1555 Las Vegas Blvd South #148
Las Vegas NEVADA 89109
UNITED STATES

Legal Entity Type: INDIVIDUAL Citizenship: UNITED STATES

NOTE: THE RESPONDENT APPLIES TO REGISTER "VEGAS" ADULT ENTERTAINMENT INTERNET ADDRESS

THIS ADDRESS IS SHARED WITH THE DOMAINS INVOLVED IN THIS DISPUTE.

ADDITIONALLY: See exhibits _____ for USPTO "VEGAS.COM"

The screenshot shows the TSDR interface for US Serial No. 86571855. The page title is 'VEGAS.SEX'. It includes a navigation bar with 'STATUS' and 'DOCUMENTS' tabs. A 'Status: results found' indicator is present. The main content area displays the following information:

- Generation on:** This page was generated by TSDR on 2015-09-26 01:23:09 EDT
- Mark:** VEGAS.SEX
- U.S. Serial Number:** 86571855
- Application Filing Date:** Mar 20 2015
- Filed as TEAS RF:** Yes
- Current TEAS RF:** Yes
- Register:** Principal
- Mark Type:** Service Mark
- Status:** A non-final Office action has been sent (issued) to the applicant. This is a letter from the examining attorney, requiring additional information and/or making an initial refusal. The applicant must respond to this Office action. To view all documents in this file, click on the Trademark Document Retrieval link at the top of this page.
- Status Date:** Jun 24 2015

Below the main information, there are expandable sections:

- ▶ **Mark Information**
- ▶ **Goods and Services**
- ▶ **Basis Information (Case Level)**
- ▶ **Current Owner(s) Information**
 - Owner Name:** Trevor Biscopa
 - Owner Address:** 3565 Las Vegas Blvd South # 148
Las Vegas, NEVADA 89109
UNITED STATES
 - Legal Entity Type:** INDIVIDUAL
 - Citizenship:** UNITED STATES
- ▶ **Attorney/Correspondence Information**
- ▶ **Prosecution History**
- ▶ **TM Staff and Location Information**

NOTE: THE RESPONDENT APPLIES TO REGISTER "VEGAS "ADULT ENTERTAINMENT INTERNET ADDRESS

THIS ADDRESS IS SHARED WITH THE DOMAINS INVOLVED IN THIS DISPUTE.

ADDITIONALLY: See exhibits _____ for USPTO "VEGAS.COM"

US Serial No.
Status [Documents](#)
C-BYTE.CLUB

Status of UDRP in case

STATUS
DOCUMENTS
Download
Print Preview

Generated on: This page was generated by TSDR on 2015-09-28 01:28:45 EDT

Mark: VEGAS ADULT

VEGAS.ADULT

US Serial Number: 85571837

Filed as TEAS ID: Yes

Register: Principal

Mark Type: Service Mark

STATUS: A non-final Office action has been sent (issued) to the applicant. This is a letter from the examining attorney requiring additional information and/or making an initial refusal. The applicant must respond to this Office action. To view all documents in this file, click on the Trademark Document Retrieval link at the top of this page.

Issue Date: Jun 24 2015

Application Filing Date: Mar 20 2015

Currently TEAS Ref: Yes

- ▶ [Mark Information](#)
- ▶ [Goods and Services](#)
- ▶ [Basis Information \(Case Level\)](#)
- ▶ [Current Owner\(s\) Information](#)
 - Owner Name: Trevor Briscoe
 - Owner Address: 3565 Las Vegas Blvd South #148
Las Vegas NEVADA 89109
UNITED STATES
 - Legal Entity Type: INDIVIDUAL
 - Citizenship: UNITED STATES
- ▶ [Attorney/Correspondence Information](#)
- ▶ [Prosecution History](#)

NOTE: THE RESPONDENT APPLIES TO REGISTER "VEGAS "ADULT ENTERTAINMENT INTERNET ADDRESS THIS ADDRESS IS SHARED WITH THE DOMAINS INVOLVED IN THIS DISPUTE.

The screenshot shows a USPTO Trademark Application page for the mark "VEGAS.PORN". At the top, the U.S. Serial Number is 86571843. The application was filed on March 20, 2015. The registrant is listed as "Principal" and the mark type is "Service Mark". The status indicates that a non-final Office action has been sent, requiring additional information or an initial refusal. The current owner is Trevor Bitcops, located at 3565 Las Vegas Blvd South #148, Las Vegas, Nevada 89109, United States. The legal entity type is "Individual" and the citizenship is "United States". The page includes a navigation menu with sections for Mark Information, Goods and Services, Basis Information, Current Owner(s) Information, Attorney/Correspondence Information, Prosecution History, and TM Staff and Location Information. A "Download" button and a "Print Preview" link are also visible.

NOTE: THE RESPONDENT APPLIES TO REGISTER "VEGAS "ADULT ENTERTAINMENT INTERNET ADDRESS THIS ADDRESS IS SHARED WITH THE DOMAINS INVOLVED IN THIS DISPUTE.

VEGAS.COM

Print: Jun 24, 2016

77450178

DESIGN MARK

Serial Number
77450178

Status
REGISTERED

Word Mark
VEGAS.COM

Standard Character Mark
Yes

Registration Number
3629770

Date Registered
2009/06/02

Type of Mark
SERVICE MARK

Register
PRINCIPAL

Mark Drawing Code
(4) STANDARD CHARACTER MARK

Owner
Vegas.Com, LLC LIMITED LIABILITY COMPANY NEVADA 2370 Corporate Circle,
3rd Floor Henderson NEVADA 89074

Goods/Services
Class Status -- ACTIVE. IC 041. US 100 101 107. G & S: Computer services, namely, providing databases featuring general and local news and information in the field of entertainment, arts, gaming, nightlife, recreation and leisure activities. First Use: 1995/01/01. First Use In Commerce: 1995/01/01.

Prior Registration(s)
3173474; 3182943; 3200635; AND OTHERS

Section 21 Statement
2(F) ENTIRE MARK

Filing Date
2008/04/16

Examining Attorney
GAYNOR, BARBARA

Print: Jun 24, 2016

77460178

Attorney of Record
Michael J. McCue

UDRP EXHIBIT *M*
PAGE *4* OF *9* PAGES
C-BYTE.CLUB

Print: Jun 24, 2016

78656196

DESIGN MARK

Serial Number

78656196

Status

SECTION 8 & 15-ACCEPTED AND ACKNOWLEDGED

Word Mark

VEGAS.COM

Standard Character Mark

Yes

Registration Number

3182943

Date Registered

2006/12/12

Type of Mark

SERVICE MARK

Register

PRINCIPAL

Mark Drawing Code

(4) STANDARD CHARACTER MARK

Owner

Vegas.com, LLC LIMITED LIABILITY COMPANY NEVADA 3rd Floor 2370
Corporate Circle Drive Henderson NEVADA 89074

Goods/Services

Class Status -- ACTIVE. IC 039. US 100 105. G & S: travel agency
services, namely providing bookings and reservations for airline
transportation, limousines, and rental cars. First Use: 2001/12/01.
First Use In Commerce: 2001/12/01.

Section 21 Statement

2(F) ENTIRE MARK

Filing Date

2005/06/22

Examining Attorney

ALT, JILL C.

Attorney of Record

Michael J. McCue

Print: Jun 24, 2016

78656203

DESIGN MARK

Serial Number

78656203

Status

SECTION 8 & 15-ACCEPTED AND ACKNOWLEDGED

Word Mark

VEGAS.COM

Standard Character Mark

Yes

Registration Number

3173474

Date Registered

2006/11/21

Type of Mark

SERVICE MARK

Register

PRINCIPAL

Mark Drawing Code

(4) STANDARD CHARACTER MARK

Owner

Vegas.com, LLC LIMITED LIABILITY COMPANY NEVADA 3rd Floor 2370
Corporate Circle Drive Henderson NEVADA 89074

Goods/Services

Class Status -- ACTIVE. IC 041. US 100 101 107. G & S: travel
agency services, namely providing ticketing, reservations and VIP
passes for entertainment shows, entertainment and sporting events,
nightclubs and golf. First Use: 2002/05/01. First Use In Commerce:
2002/05/01.

Prior Registration(s)

2857427;2995274;2995276;AND OTHERS

Section 21 Statement

2(F) ENTIRE MARK

Filing Date

2005/06/22

Examining Attorney

WAHLBERG, STACY

Print: Jun 24, 2015

78656207

DESIGN MARK

Serial Number

78656207

Status

SECTION 8 & 15-ACCEPTED AND ACKNOWLEDGED

Word Mark

VEGAS.COM

Standard Character Mark

Yes

Registration Number

3200635

Date Registered

2007/01/23

Type of Mark

SERVICE MARK

Register

PRINCIPAL

Mark Drawing Code

(4) STANDARD CHARACTER MARK

Owner

Vegas.com, LLC LIMITED LIABILITY COMPANY NEVADA 3rd Floor 2370
Corporate Circle Drive Henderson NEVADA 89074

Goods/Services

Class Status -- ACTIVE. IC 043. US 100 101. G & S: travel agency
services, namely providing bookings and reservations for hotels,
restaurant, bars and lounges. First Use: 2001/01/01. First Use In
Commerce: 2001/01/01.

Prior Registration(s)

2857427;2995274;3064105;AND OTHERS

Section 2f Statement

2(F) ENTIRE MARK

Filing Date

2005/06/22

Examining Attorney

WAHLBERG, STACY

Print: Jun 24, 2018

78858252

DESIGN MARK

Serial Number
78656252

Status
SECTION 8 & 15-ACCEPTED AND ACKNOWLEDGED

Word Mark
VEGAS.COM

Standard Character Mark
No

Registration Number
3311739

Date Registered
2007/10/16

Type of Mark
SERVICE MARK

Register
PRINCIPAL

Mark Drawing Code
(3) DESIGN PLUS WORDS, LETTERS AND/OR NUMBERS

Owner
Vegas.com, LLC LIMITED LIABILITY COMPANY NEVADA 3rd Floor 2370
Corporate Circle Drive Henderson NEVADA 89074

Goods/Services
Class Status -- ACTIVE. IC 043. US 100 101. G & S: travel agency
services, namely providing bookings and reservations for hotels,
restaurant, bars and lounges. First Use: 2001/09/01. First Use In
Commerce: 2001/09/01.

Prior Registrations(s)
2857427;2995274;2995276;AND OTHERS

Colors Claimed
Color is not claimed as a feature of the mark.

Section 21 Statement
2(E) ENTIRE MARK

Filing Date
2005/06/22

Print: Jun 24, 2016

78656258

DESIGN MARK

Serial Number
78656258

Status
SECTION 8 & 15-ACCEPTED AND ACKNOWLEDGED

Word Mark
VEGAS.COM

Standard Character Mark
No

Registration Number
3129209

Date Registered
2006/08/15

Type of Mark
SERVICE MARK

Register
PRINCIPAL

Mark Drawing Code
(3) DESIGN PLUS WORDS, LETTERS AND/OR NUMBERS

Owner
Vegas.com, LLC LIMITED LIABILITY COMPANY NEVADA 3rd Floor 2370
Corporate Circle Drive Henderson NEVADA 89074

Goods/Services
Class Status -- ACTIVE. IC 041. U9 100 101 107. G & S: Arranging
for ticket reservations, reservations and VIP passes for entertainment
shows, nightclubs, golf games, and other entertainment events. First
Use: 2002/05/01. First Use In Commerce: 2002/05/01.

Prior Registration(s)
2857427;2995276

Disclaimer Statement
NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE ".COM" APART FROM THE
MARK AS SHOWN.

Colors Claimed
Color is not claimed as a feature of the mark.

Section 2f Statement
as to "VEGAS"

Print: Jun 24, 2016

78886272

DESIGN MARK

Serial Number

78656272

Status

SECTION 8 & 15-ACCEPTED AND ACKNOWLEDGED

Word Mark

VEGAS.COM

Standard Character Mark

No

Registration Number

3129210

Date Registered

2006/08/15

Type of Mark

SERVICE MARK

Register

PRINCIPAL

Mark Drawing Code

(3) DESIGN PLUS WORDS, LETTERS AND/OR NUMBERS

Owner

Vegas.com, LLC LIMITED LIABILITY COMPANY NEVADA 3rd Floor 2370
Corporate Circle Drive Henderson NEVADA 89074

Goods/Services

Class Status -- ACTIVE. IC 039. US 100 105. G & S: travel agency services, namely providing bookings and reservations for airline transportation, limousines and rental cars. First Use: 2001/12/01. First Use In Commerce: 2001/12/01.

Prior Registrations(s)

2857427;2995276

Disclaimer Statement

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE ".COM" APART FROM THE MARK AS SHOWN.

Colors Claimed

Color is not claimed as a feature of the mark.

Section 21 Statement

as to "VEGAS"



Lenard D. Biscope
CFO at Vegas Licence International LLC
Calgary, Canada Area | Construction

Current C-BYTE Company Inc., Vegas Licence International LLC, WRP
Previous CH2M HILL, Wildrose Alliance Party, Kearl Lake project
Educator College

Send Lenard D. InMail

136 connections

<https://ca.linkedin.com/pub/lenard-d-biscope/21/809/679>

Contact Info



Trevor Biscope Wrong Trevor Biscope?
Chairman


Phone: (800) ***-**** HQ Phone
Local Address: Calgary, Alberta, Canada

C-Byte Inc.
185 Broadway Avenue
Alamosa, Colorado 81101
United States

Company Description: C-Byte, Inc. headquartered in Calgary, Alberta, Canada, is a leading architect and provider of open client/server systems for commercial computer applications in... more

Screen shots of un-authorized use of "C-Byte" by Canadians Trevor Biscope and Lenard Biscope from Calgary Alberta area Canada

screen shot of website that resolves to disputed domain(s)



company | customers | solutions | alliances | products | services

C-BYTE
shop | news | jobs | worldwide | contact us | search

The Leader in Intel[®]-based Data Center Solutions

quicksearch worldwide
[Select a Country] [get] [select]

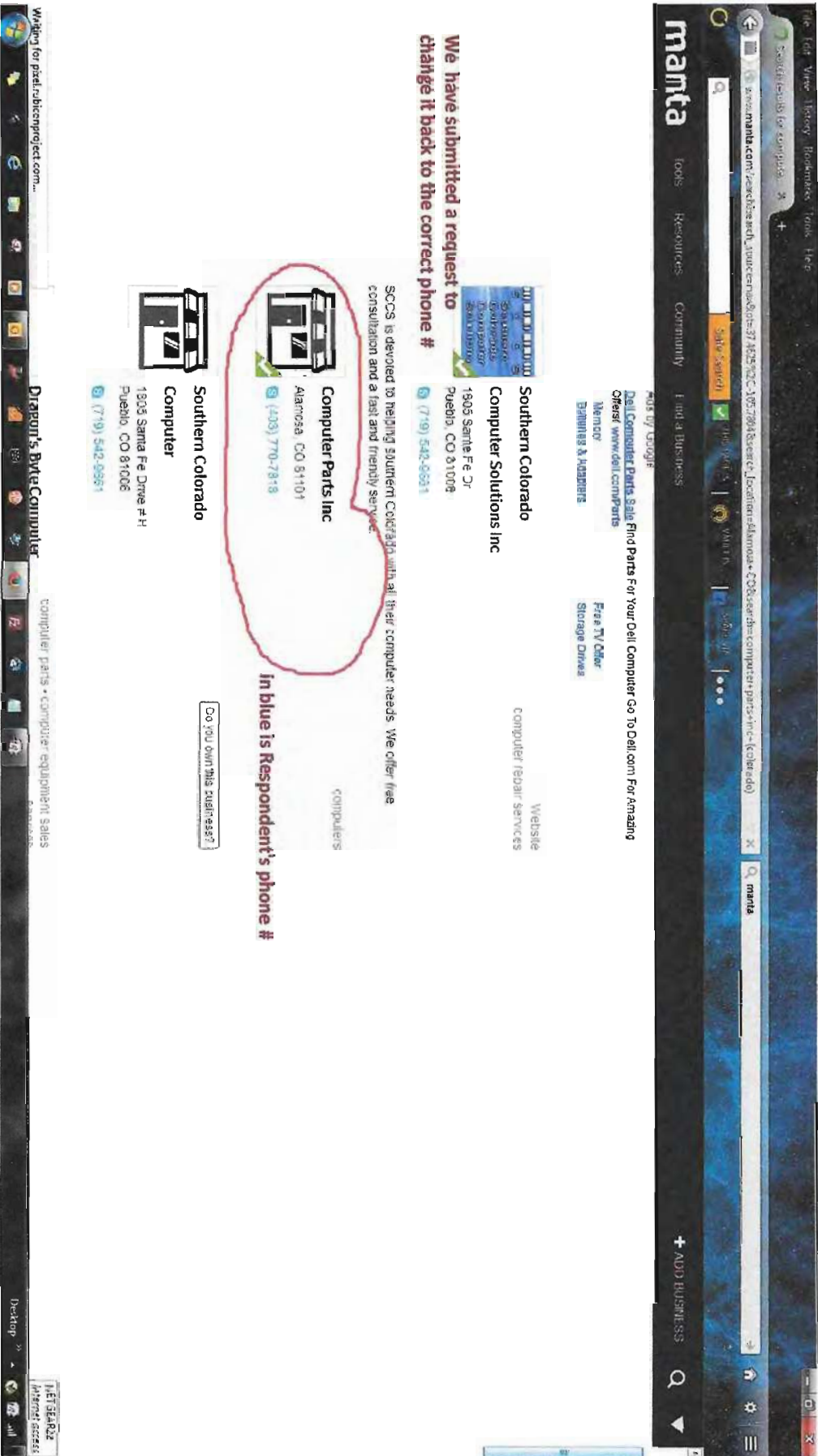
The Solutions in this age of customer focus... business agility

Projects@C-Byte™ (Official) Est.1989
Cost, Easy, & Effective. Intel®. Free. Faster. Needed. In Minutes. No. 1. 100% Satisfaction. Approved by the industry with 1000+ reviews. 100%

Image Sourced By: Dennis P. [unreadable]

Manta business search site
Respondent changed business listing for
C-Byte Computer Systems LLC's affiliate "Computer Parts Inc"
with Respondent's phone number compare exhibits

Wednesday, June 03, 2015
9:32 PM



Workspace Webmail :: IC3 filing UDRP c-byte.com

Tuesday, August 27, 2013
8:59 AM

Exhibit 29
8 page of 9

[Print](#) | [Close Window](#)

Subject: IC3 Complaint: I1308191142508922
From: no-reply@ic3.gov
Date: Mon, Aug 19, 2013 11:11 am
To: <admin@e-partz.com>

UDRP EXHIBIT
PAGE OF PAGES
C-BYTE.CLUB

Thank you for filing a complaint with the Internet Crime Complaint Center (IC3).

Your complaint has been successfully submitted. Please retain the following information for future contacts with the IC3:

Complaint Id: I1308191142508922
Password: XXXXXXXXXXX

If you wish to view/download your complaint or have any additional information to provide to the IC3, please use the following link and login with the above complaint id and password.
<http://complaint.ic3.gov/update>

The IC3's mission is to serve as a vehicle to receive, develop, and refer criminal complaints regarding the rapidly expanding arena of cyber crime. The IC3 aims to give the victims of cyber crime a convenient and easy-to-use reporting mechanism.

Complaint Status

The IC3 receives thousands of complaints each month and does not have the resources to respond to inquiries regarding the status of complaints. It is the IC3's intention to review all complaints and refer them to law enforcement and regulatory agencies having jurisdiction. Ultimately, investigation and prosecution are at the discretion of the receiving agencies.

Evidence

It is important that you maintain any evidence you may have relating to your complaint. Evidence may include canceled checks, credit card receipts, phone bills, mailing envelopes, mail receipts, a printed copy of a website, copies of emails, or similar items. Please keep the items in a safe location, in case you are requested to provide them for investigative purposes.

Additionally, to learn more about Internet schemes and ways to protect yourself, please visit www.lookstoooodtobetruer.com.

Copyright © 2003-2013. All rights reserved.

Exhibit 29
8 page of 9

Thursday, August 22, 2013
8:55 PM

Exhibit 30

8 page of 9

Internet Explorer browser window showing the URL: <http://www.ipcenter.gov/index/atlantique-coordination-center-udrp>

Navigation menu: Home, About Us, Newsroom, Library, Contact Us, Report IP Crimes.

Search bar: Search []

Utility icons: Norton, Safe Web, Share, Print, Login Assistant.

Thank You

Thank You for your input.

Thank you for visiting the National IPR Coordination Center Referral website. We have received your submission. Thanks ICE National IPR Coordination Center.

Comments

Last Friday Aug 16th our domain was hacked by a former employee and is now putting out bogus address and information. The hacker's Trevor Biscope (Canadian) Fernie BC using a PO Box 8496 Kalispell Montana 59904

The stolen domains are c-byte.com and c-byte.net

The registrar where the c-byte.com name was stolen is Registrar.com and the registrar where the c-byte.net name was stolen is Name.com LLC

Mr Biscope is a programmer server and routers has worked for the Carbone (Frank) in Toronto Canada has gambling software and auction software that he wants to run illegally. He just got out of prison July 11th in Alberta Canada. We have notified the Alberta Justice dept and the FBI cyber crime unit IC3 Complaint Id: 1130819142508922 We tried to employ Mr Biscope and were never able to because he did not supply verifiable identification. Please contact us as soon as possible because we suspect that Mr Biscope will use our company and our identity to run illegal gambling and auction software. We have the supporting documents

First and Last Name
Wanda Brink

Phone Number

719 805 3922

Your E-Mail Address

admin@e-partz.com

captcha

x

U.S. Department of Homeland Security | USA.gov | Freedom of Information | Privacy & Usage Policy | Site Map | Contact Us

UDRP EXHIBIT W
PAGE 2 OF 2 PAGES
C-BYTE.CLUB

UDRP EXHIBIT W
PAGE 2 OF 2 PAGES
C-BYTE.CLUB

Windows taskbar showing system tray with clock at 10:10 AM and date 8/22/2013.

Windows taskbar showing application icons: Internet Explorer, Windows Explorer, etc.

Windows taskbar showing system tray with volume, network, and power icons.

Exhibit 30

8 page of 9

Respondent's registered domains****(including disputed domains)****INFORMATION RESOURCE DOMAINTOOLS.COM & GANDI SAS****C-Byte disputed domains:**

Domain registration	date	Domain registration	date
c-bytes.com	6/19/2015	vegas.sex	9/11/2015
c-bytecompany.com	6/16/2015	vegas.black	6/24/2015
c-byte.enterprises	6/14/2015	vegas.trade	6/8/2015
c-byte.international	6/14/2015	vegaslicenseinternational.com	5/23/2015
c-byte.pw	4/25/2015	vegas.koeln	5/21/2015
c-byte.club	4/25/2015	vegas.hiphop	5/8/2015
c-byte.co	6/09/2014	vegas.cologne	5/6/2015
c-byte.us.com*	12/5/2013	vegas.care	4/14/2015
		vegaslicense.international	4/4/2015
		vegas.management	4/3/2015
		vegas.solutions	4/1/2015
		vegas.support	4/1/2015
		vegas.systems	4/1/2015
		vegas.us.org	3/8/2014
		vegas.uk.com	9/10/2013
		vegas.xxx	1/20/2012
		vegas.ar.com	5/24/2011
		vegas.gb.com	8/16/2010
		vegas.im	2/22/2009

NB is part of CentralNic CDRP*** 39 registrations are listed for the Respondent . For the sake of evidence only the relevant domains are listed here.**

domain: vegas.im
reg_created: 2009-02-22 20:30:36
expires: 2017-03-01 00:59:52
created: 2009-02-22 21:30:51
changed: 2015-08-19 01:18:33
transfer-prohibited: yes
ns0: a.dns.gandi.net
ns1: b.dns.gandi.net
ns2: c.dns.gandi.net
owner-c:
 nic-hdl: TB1530-GANDI
 owner-name: Trevor Biscope
 organisation: ~
 person: Trevor Biscope
 address: "Licensee: (VEGAS™) Vegas License International LLC, c/o Chief Legal Officer\r\n3565 Las Vegas Blvd South 148"
 zipcode: 89109
 city: Las Vegas
 state: Nevada
 country: United States of America
 phone: +1.7027202300
 fax: "
 email: e939a0a836b0305845bba42c973767f8-698860@contact.gandi.net
 lastupdated: 2015-08-15 01:55:27
admin-c:
 nic-hdl: MJ4835-GANDI
 organisation: Vegas.IM Ltd
 person: Martin Jarvis
 address: "Vegas™ Sublicensed\r\n62 Moorecroft Drive\r\nAirdrie, North Lanarkshire Scotland"
 zipcode: ML6 8ES
 city: Airdrie
 country: United Kingdom
 phone: +44.7568180163
 fax: ~
 email: de9bf5d7152816e1330bcd1e12a6ceaf-2364124@contact.gandi.net
 lastupdated: 2015-08-25 07:26:57
tech-c:
 nic-hdl: MJ4835-GANDI
 organisation: Vegas.IM Ltd
 person: Martin Jarvis
 address: "Vegas™ Sublicensed\r\n62 Moorecroft Drive\r\nAirdrie, North Lanarkshire Scotland"
 zipcode: ML6 8ES
 city: Airdrie
 country: United Kingdom
 phone: +44.7568180163
 fax: ~
 email: de9bf5d7152816e1330bcd1e12a6ceaf-2364124@contact.gandi.net
 lastupdated: 2015-08-25 07:26:57
bill-c:
 nic-hdl: TB4550-GANDI
 organisation: Vegas License International LLC

CDRP 2015 | C-BYTE.US.COM

person: Trevor Biscope

address: "Licensee: (VEGAS™) Vegas License International LLC c/o Chief Legal Officer\r\n3565 Las Vegas
Blvd South #148"

zipcode: 89109

city: Las Vegas

state: Nevada

country: United States of America

phone: +1.7027202300

fax: ~

email: 6168b8b40da1ff7e5dc165454c30e0e2-1914487@contact.gandi.net

lastupdated: 2015-08-15 02:28:03

UDRP EXHIBIT T
PAGE 3 OF 7 PAGES
C-BYTE.CLUB

WHOIS from <<https://www.gandi.net/whois/details?search=vegas.im>>

Domain Name: VEGAS.SEX
Domain ID: D3403065-AGRS
Creation Date: 2015-09-11T11:51:26Z
Registry Expiry Date: 2016-09-11T11:51:26Z
Sponsoring Registrar: Gandi SAS (R3216-AGRS)
Sponsoring Registrar IANA ID: 81
WHOIS Server:
Referral URL:
Domain Status: serverTransferProhibited -- <http://www.icann.org/epp#serverTransferProhibited>
Registrant ID: TB1530-GANDI
Registrant Name: Trevor Biscope
Registrant Organization:
Registrant Street: Licensee: Vegas License International LLC, c/o Chief Legal Officer
Registrant Street: 3565 Las Vegas Blvd South 148
Registrant City: Las Vegas
Registrant State/Province: NV
Registrant Postal Code: 89109
Registrant Country: US
Registrant Phone: +1.7027202300
Registrant Phone Ext:
Registrant Fax: +33.143730576
Registrant Fax Ext:
Registrant Email: biscope@c-byte.us.com
Admin ID: TB1530-GANDI
Admin Name: Trevor Biscope
Admin Organization:
Admin Street: Licensee: Vegas License International LLC, c/o Chief Legal Officer
Admin Street: 3565 Las Vegas Blvd South 148
Admin City: Las Vegas
Admin State/Province: NV
Admin Postal Code: 89109
Admin Country: US
Admin Phone: +1.7027202300
Admin Phone Ext:
Admin Fax: +33.143730576
Admin Fax Ext:
Admin Email: biscope@c-byte.us.com
Tech ID: TB1530-GANDI
Tech Name: Trevor Biscope
Tech Organization:
Tech Street: Licensee: Vegas License International LLC, c/o Chief Legal Officer
Tech Street: 3565 Las Vegas Blvd South 148
Tech City: Las Vegas
Tech State/Province: NV
Tech Postal Code: 89109
Tech Country: US
Tech Phone: +1.7027202300
Tech Phone Ext:
Tech Fax: +33.143730576
Tech Fax Ext:
Tech Email: biscope@c-byte.us.com

CDRP 2015 | C-BYTE.US.COM

Name Server: B.DNS.GANDI.NET

Name Server: C.DNS.GANDI.NET

Name Server: A.DNS.GANDI.NET

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

DNSSEC: Unsigned

WHOIS from <<https://whois.domaintools.com/vegas.sex>>

UDRP EXHIBIT ^T
PAGE 5 OF 7 PAGES
C-BYTE.CLUB

VEGAS.PORN FOR SALE

The screenshot shows a web browser window with the address bar displaying <https://whois.domaintools.com/vegas.porn>. The page content includes a navigation menu with 'DOMAINTOOLS', 'PROFILE', 'CONNECT', 'MONITOR', 'ACQUIRE', 'SUPPORT', and 'Whois Lookup'. A prominent green banner states 'Domain Available' and 'Vegas.porn is for sale!' with a 'Buy Vegas.porn' button. Below the banner, the 'Whols & Quick Stats' section lists: Email (chris@417.com), Registrant Org (417 RENTALS, LLC), Dates (Created on 2015-03-04, Expires on 2021-03-04, Updated on 2015-05-29), IP Address (66.240.194.139), IP Location (California - San Marcos - Rightway Gate Inc), ASN (AS10439 CARINET - CarINet, Inc), Domain Status (Registered And Parked Or Redirected), Whois History (6 records), and Whois Server (whois.nic.porn). The 'Website' section shows: Website Title (www.vegas.porn Coming Soon), Response Code (200), SEO Score (68%), Terms (139), and Images (14).

VEGAS.ADULT FOR SALE

Thursday, September 24, 2015
12:35 PM



DOMAINTOOLS PROFILE CONNECT MONITOR ACQUIRE SUPPORT Whois!

 **Vegas.adult is for sale!**
The owner of the domain you are researching has it listed for sale.

[Buy Vegas adult](#)


Whois & Quick Stats


Email chris@417.com is associated with ~4,056 domains

Registrant Org 417 RENTALS, LLC is associated with ~124 other domains

Dates Created on 2015-03-04 - Expires on 2021-03-04 - Updated on 2015-05-29

IP Address 66.240.194.139 - 76,727 other sites hosted on this server

IP Location  - California - San Marcos - Rightway Gate Inc

ASN  AS10439 CARINET - CarINet, Inc. (registered Aug 05, 1997)

Domain Status Registered And Parked Or Redirected

Whois History 4 records have been archived since 2015-03-04

Whois Server whois.nic.adult

Website

Website Title www.vegas.adult Coming Soon

Response Code 200

SEO Score 68%

Terms 139 (Unique: 102, Linked: 35)

Images 14 (Alt tags missing: 11)

Links 23 (Internal: 0, Outbound: 0)





COLORADO
Department of Revenue
Enforcement Division

UDRP EXHIBIT *U*
PAGE *1* OF *8* PAGES
C-BYTE.CLUB

- Home
- Auto Industry
- Gaming
- Liquor & Tobacco
- Marijuana
- Racing
- Contact Us

WHAT IS LEGAL? GAMBLING QUESTIONS IN COLORADO

The Colorado Constitution and Colorado law allow only certain types of "gambling." In addition to limited gaming in Colorado casinos, the following forms of gambling are legal:

- Colorado Lottery
- Colorado Division of Racing - Live and off-track betting on horse racing events
- Secretary of State's Office - Licensing & Regulations for bingo, raffles and charitable games.
- "Social" gambling (See Social Gambling Exception below)

All other forms of gambling are prohibited.

Information and commonly asked questions about both legal and illegal gambling activities:

Illegal Gambling Activities News Release

[+ Charity Organizations and Casino "Gambling" Events](#)

[+ Fraudulent Acts](#)

[+ Social Gambling Exception](#)

[+ Poker Tournaments and Casino Nights](#)

Internet Gambling

C-BYTE.CLUB

Internet gambling is illegal under state and federal laws. Colorado law prohibits the transmission or reception of gambling information by any means. The federal Unlawful Internet Gambling Enforcement Act, signed into law in October 2006, prohibits online gamblers from using credit cards, checks and electronic fund transfers to place and settle bets. Further, the federal 1961 Wire Act also prohibits the use of wire communications in interstate or foreign commerce for the placing of bets or wagers or information assisting in the placing of bets or wagers.

Unlike participants in legalized forms of gambling, persons who wager on online casinos have no recourse with any state agency should they not be paid for winning wagers or have any other dispute with the entity with which they are placing their bets. Furthermore, players are not guaranteed odds. By statute, slot and video machines in Colorado casinos must pay out between 80 percent and 100 percent. Online casinos are not required to have minimum payouts and are under no form of regulatory control to ensure compliance with any payout controls.

Many online sites advertise they are "legal" and "licensed" forms of wagering. They may be legal or licensed where the bets are received, but it remains illegal to place bets from Colorado with these businesses.

In addition, the Colorado Limited Gaming Control Commission prohibits persons and businesses licensed in the casino industry in Colorado from having any involvement with internet gaming sites that can be accessed by Colorado residents.

0	10	0	
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[Colorado.gov Policies](#) | [Citizens' Advocate](#) | [Contact Us](#) |

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GAMING INDUSTRY BULLETIN

September 21, 2005
Revised February 13, 2012

Involvement with Illegal Gambling

On August 31, 2005, the Colorado Limited Gaming Control Commission and the Colorado Attorney General's Office issued a joint news release warning Colorado residents against participating in illegal gambling activities. The release is a follow-up to a similar release regarding illegal internet gambling issued in August 2001 and statements regarding illegal gambling from the Division in the past. According to the release, state and federal laws prohibit internet gaming and telephone sports wagering. The release also clarifies the State's position on poker tournaments outside licensed casinos and "social gambling." The Division's official position on the legality of internet gaming and poker tournaments outside licensed casinos can be found on the Division's web site at

<http://www.colorado.gov/cs/Satellite/Rev-Gaming/RGM/1213781235483>

Participation in illegal gambling activities is a violation of Title 18 of the Colorado Revised Statutes and a conviction thereof would be considered a gambling-related offense which is a disqualifier for gaming licensure according to C.R.S. 12-47.1-510. Furthermore, C.R.S. 12-47.1-801(2)(b) prohibits licensees from associating with persons or businesses involved in illegal gambling activities. Therefore, gaming licensees and applicants are strictly prohibited from participating in illegal gambling activities or associating with persons or businesses involved in illegal gambling activities. The Gaming Commission and the Division prohibit persons and businesses licensed in the casino industry from having any involvement with internet gaming sites that can be accessed by Colorado residents or with businesses or organizations that offer or sponsor illegal poker tournaments. This includes, but is not limited to, having a financial interest in an illegal internet gaming site; dealing poker for, sponsoring or hosting an event sponsored by a business that hosts an illegal gaming web site; or dealing poker for an illegal home poker tournament.

**Colorado Department of Law
Attorney General's Office**1525 Sherman Street, 7th Floor, Denver, CO 80203
(303) 866-4500 • fax (303) 866-5691**Colorado Department of Revenue
Limited Gaming Control Commission**1881 Pierce St., Ste. 112, Lakewood, CO 80214-1496
(303) 205-1355 • fax (303) 205-1342**NEWS RELEASE**FOR IMMEDIATE RELEASE
August 31, 2005Contact: Kristen Hubbell / Don Burmania
Phone: (303) 866-5632 / (303) 205-1334**Attorney General Suthers and Gaming Commission
Caution Against Illegal Gambling Activities**

DENVER—Colorado Attorney General John Suthers and Colorado Limited Gaming Control Commission Chairman Natalie Meyer today cautioned Colorado residents against participating in illegal gambling activities. With the increased popularity of internet gambling, televised poker tournaments and sports pools, much confusion surrounds the legality of these activities.

Internet gaming, despite being a multi-billion dollar industry, is illegal. Both federal and state laws prohibit internet gaming, as well as toll-free sports wagering hotlines.

“Not only is internet gambling illegal, it is risky,” said Attorney General Suthers. “The player has no idea if the games are being conducted fairly or whether they will even be paid. Plus there are no regulatory controls prohibiting children from accessing the sites and playing.”

Unlike participants in legalized forms of gambling, persons who wager on online casinos or with telephone sports books have no recourse with any state agency should they not get paid or have any other complaint. Furthermore, in the case of online casinos, players are not guaranteed odds. By law, slot and video machines in Colorado casinos must pay out between 80 percent and 100 percent. Online casinos have no minimum payouts or regulatory payout controls.

-more-



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**Colorado Department of Revenue
Limited Gaming Control Commission**

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(303) 205-1355 • fax (303) 205-1342

FOR IMMEDIATE RELEASE
August 31, 2005

Contact: Kristen Hubbell / Don Burmania
Phone: (303) 866-5632 / (303) 205-1334

QUESTIONS & ANSWERS: ILLEGAL GAMBLING

Q: Is it legal to place wagers over the internet or by calling a toll-free number in Colorado?

A: No. Internet gambling sites and telephone sports books are illegal under state and federal laws. Colorado law prohibits the transmission or reception of gambling information by any means. Federal law also prohibits the use of wire communications in interstate or foreign commerce for the placing of bets or wagers or information assisting in the placing of bets or wagers. In addition, the Colorado Constitution allows only certain types of "gambling," which does not include internet or telephone wagering.

Q: What forms of "gambling" are expressly authorized by law?

A: The Colorado Lottery; live and off-track wagering on horse and dog racing events; bingo, raffles and charitable games licensed and regulated by the Secretary of State's office; limited stakes gaming in casinos in Black Hawk, Central City and Cripple Creek, as well as on tribal reservation land; and "social gambling."

Q: What is "social gambling"?

A: State law allows "social gambling" among participants who have a "bona fide social relationship" and in which all moneys wagered goes out in prizes. A "bona fide social relationship" means that the parties must have an established social relationship based upon some other common interest other than the gambling activity. Further, participants cannot directly or indirectly participate in "professional gambling," which is defined as "aiding or inducing another to engage in gambling, with the intent to

-more-

QUESTIONS & ANSWERS – Page 2

derive a profit therefrom.” This generally means that no one other than the players can profit from the game or activity in any manner. The profit does not need to be direct profit. For example, if a liquor establishment or other commercial enterprise derives increased sales or revenues by attracting customers, even without charging a cover or other direct consideration, as the result of gambling taking place at that business, the business is considered to have profited from the activity and the activity would no longer fall under the social gambling exception. These two criteria—a bonafide social relationship and no profit motive—must be present for a gambling activity to be considered legal “social gambling.”

Q: How can online sites and telephone sports book advertise that they are “legal” and “licensed”?

A: These advertisements tell only half the story. The internet site or sports book may be legal or licensed where the site or number is set up, usually offshore, so in that respect they are truthful. However, what the advertisements fail to mention is that placing wagers on these sites or numbers is illegal in the United States and Colorado.

Q: Can radio and television stations and newspapers legally accept advertising for “illegal” sports gambling activities?

A: No. Colorado law prohibits intentionally promoting or facilitating the commission of a criminal offense by aiding, abetting, advising or encouraging the offense. Because advertisements for such activity assist and encourage the violation of Colorado and federal law by soliciting customers in Colorado to bet illegally, the advertising would also likely violate Colorado Consumer Protection statutes regarding deceptive trade practices.

–more–

UDRP c-byte.com

Exhibit 27 E
7 page of 9

QUESTIONS & ANSWERS – Page 3

Q: Is there anything being done in Colorado to curb internet gaming?

A: The Colorado Limited Gaming Control Commission has adopted a policy prohibiting persons and businesses licensed in the casino industry in Colorado from having any involvement with internet gaming sites that can be accessed by Colorado residents.

Q: What makes a poker tournament legal or illegal?

A: The main distinction is whether the poker being played is considered “gambling.” For “gambling” to occur, three elements must be present: consideration, chance, and reward. These elements are sometimes expressed as “payment, luck, and prize.” The first level of inquiry, then, is whether all three of these components are present, because by eliminating any one of them, the activity would not meet the definition of “gambling” as set forth in Colorado law.

For example, if the consideration component is eliminated and no fee, buy-in or other money is required or solicited from the participants in a poker tournament, then prizes may be awarded to the player(s) who perform well in the tournament. This is how several organized poker tournaments are able to operate legally outside the three gaming towns. On the other hand, if an organization charges a donation, fee or other buy-in for a poker tournament or other event, then it cannot legally distribute prizes based upon who wins or plays well in the tournament or event. Such organization could legally conduct a drawing, door prize or raffle as long as the prizes are randomly awarded and are not tied to success in the tournament or event. Likewise, the organization could legally conduct the tournament for the pure entertainment value alone. By disconnecting the prize from the risk element of the poker or other event, such activity would arguably not meet the definition of gambling.

If all three elements are present, the activity is considered “gambling” and can only be conducted in the context of “social gambling” as previously defined.

–more–

Exhibit 27 E
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UDRP c-byte.com

QUESTIONS & ANSWERS – Page 4

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C-BYTE.CLUB

Exhibit 27 F
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Q: Are "charitable" poker tournaments allowed?

A: A misconception exists that if a poker tournament is for charity, or the prizes are donated, the charity could charge for the event. Such an event would still be illegal under Colorado law because the three elements of gambling listed above are present. Although the Colorado General Assembly approved a charitable gambling exception in the liquor code in 1979, it was repealed in 1983 because of the explosion of "charity" events, enforcement issues and problems encountered with the money actually going to the charities.

Q: Who can a person contact if they suspect that they may have an addiction problem associated with any type of gambling?

A: Anyone who believes that they may have a addiction problem with internet or telephone wagering, or any other type of gambling activity, legal or illegal, should contact the Compulsive Gambling Hotline at 1-800-522-4700.

UDRP EXHIBIT
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C-BYTE.CLUB

Exhibit 27 F
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UDRP EXHIBIT C
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C-BYTE.COMPANY

NATIONAL ARBITRATION FORUM

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C-BYTE.CLUB

DECISION

C-Byte Computer Systems LLC v. Trevor Biscope / C-Byte, Inc.

Claim Number: FA1310001523522

PARTIES

Complainant is C-Byte Computer Systems LLC ("Complainant"), represented by Wanda Brink, Colorado, USA. Respondent is Trevor Biscope / C-Byte, Inc. ("Respondent"), Montana, USA.

REGISTRAR AND DISPUTED DOMAIN NAMES

The domain name at issue is <c-byte.net>, registered with Name.com LLC.

The domain name at issue is <c-bytecomputersystems.com>, registered with GANDI SAS.

The domain name at issue is <c-byte.com>, registered with REGISTER.COM, INC.

PANEL

The undersigned certifies he has acted independently and impartially and to the best of his knowledge has no known conflict in serving as Panelist in this proceeding.

Houston Putnam Lowry, Chartered Arbitrator, as Panelist.



UDRP EXHIBIT C
PAGE 2 OF 28 PAGES
C-BYTE.COMPANY

1 PROCEDURAL HISTORY

2 Complainant submitted a Complaint to the National Arbitration Forum
3 electronically on October 8, 2013; the National Arbitration Forum received
4 payment on October 9, 2013.

UDRP EXHIBIT E
PAGE 2 OF 28 PAGES
C-BYTE.CLUB

5
6 On October 9, 2013, Name.com LLC confirmed by e-mail to the National
7 Arbitration Forum that the <c-byte.net> domain name is registered with
8 Name.com LLC, and that Respondent is the current registrant of the name.
9 Name.com LLC has verified that Respondent is bound by the Name.com LLC
10 registration agreement and has thereby agreed to resolve domain disputes
11 brought by third parties in accordance with ICANN's Uniform Domain Name
12 Dispute Resolution Policy (the "Policy").

13
14 On October 9, 2013, GANDI SAS confirmed by e-mail to the National Arbitration
15 Forum that the <c-bytecomputersystems.com> domain name is registered with
16 GANDI SAS and that Respondent is the current registrant of the name. GANDI
17 SAS has verified that Respondent is bound by the GANDI SAS registration
18 agreement and has thereby agreed to resolve domain disputes brought by third
19 parties in accordance with ICANN's Uniform Domain Name Dispute Resolution
20 Policy (the "Policy").

21
22 On October 9, 2013, REGISTER.COM, INC. confirmed by e-mail to the National
23 Arbitration Forum that the <c-byte.com> domain name is registered with
24 REGISTER.COM, INC. and that Respondent is the current registrant of the
25 names. REGISTER.COM, INC. has verified that Respondent is bound by the
26 REGISTER.COM, INC. registration agreement and has thereby agreed to
27 resolve domain disputes brought by third parties in accordance with ICANN's
28 Uniform Domain Name Dispute Resolution Policy (the "Policy").

29
30 On October 11, 2013, the Forum served the Complaint and all Annexes,
31 including a Written Notice of the Complaint, setting a deadline of October 31,
32 2013 by which Respondent could file a Response to the Complaint, via e-mail to

UDRP EXHIBIT 0
PAGE 3 OF 28 PAGES
C-BYTE COMPANY

1 all entities and persons listed on Respondent's registration as technical,
2 administrative, and billing contacts, and to postmaster@c-byte.com,
3 postmaster@c-byte.net, and postmaster@c-bytecomputersystems.com. Also on
4 October 11, 2013, the Written Notice of the Complaint, notifying Respondent of
5 the e-mail addresses served and the deadline for a Response, was transmitted to
6 Respondent via post and fax, to all entities and persons listed on Respondent's
7 registration as technical, administrative and billing contacts.

UDRP EXHIBIT E
PAGE 3 OF 28 PAGES
C-BYTE CLUB

8
9 A timely Response was received and determined to be complete on October 31,
10 2013.

11
12 A timely Additional Submission was received from Complainant and determined
13 to be complete on November 5, 2013.

14
15 A timely Addition Submission was received from Respondent and determined to
16 be complete on November 5, 2013.

17
18 On November 8, 2013, pursuant to Complainant's request to have the dispute
19 decided by a single-member Panel, the National Arbitration Forum appointed
20 Houston Putnam Lowry, Chartered Arbitrator, as Panelist.

21
22 Having reviewed the communications records, the Administrative Panel (the
23 "Panel") finds that the National Arbitration Forum has discharged its responsibility
24 under Paragraph 2(a) of the Rules for Uniform Domain Name Dispute Resolution
25 Policy (the "Rules") "to employ reasonably available means calculated to achieve
26 actual notice to Respondent" through submission of Electronic and Written
27 Notices, as defined in Rule 1 and Rule 2.

28
29 **RELIEF SOUGHT**

30 Complainant requests that the domain names be transferred from Respondent to
31 Complainant.

UDRP EXHIBIT C
PAGE 4 OF 28 PAGES
C-BYTE.COM COMPANY

1 PARTIES' CONTENTIONS

2 A. Complainant

3 C-Byte Computer Systems LLC (Complainant) is a registered single member limited
4 liability corporation formed under the laws of the state of Colorado United States of
5 America.

6
7 Vegas Brand Enterprises Inc is the single member of the limited liability corporation C-
8 Byte Computer Systems LLC.

9
10 The real office location of C-Byte Computer Systems LLC is 185 Broadway Ave,
11 Alamosa, CO 81101.

12
13 FACTUAL AND LEGAL GROUNDS

14 This is a case of identity theft and domain hijacking. Funding has been difficult or this
15 would have been filed sooner and the Respondent was aware of this took advantage of
16 this delay to offer free membership in illegal online gambling etc. See list of games and
17 one-step invite.

18
19 In the beginning;

20 February 8, 2013, C-Byte Computer Systems LLC acquired the domains <c-byte.com>
21 and <c-byte.net> from the original owner Trevor Biscope. (Respondent Trevor
22 Biscops/C-Byte, Inc.)

23
24 Following that acquisition, C-Byte Computers Systems LLC invested in a EV SSL
25 (green bar ssl) through Computer Parts Inc. (Colorado) program with Starfield Tech. for
26 <c-byte.com> and a standard ssl for <c-byte.net>. Office space and signage as in the
27 photos included in this matter. The sites are to be used to sell software and services to
28 the public to the benefit of the corporations and to hire Respondent as technical
29 support/ advisor/ and server side assistant. The sites were hosted at WWQuote of
30 Calgary Alberta paid for by Computer Parts Inc. (Colorado).

31

1 The Respondent also assigned other sites to the main corporation at the initial startup of
2 Vegas Brand Enterprises Inc., an EV SSL was provided to <vegas.xxx>. The server
3 used was paid for by Computer Parts Inc. (Colorado) to WWQuote a Calgary Alberta
4 company.

5
6 **False Information and Separation:**

7 The Respondent falsely provided the address of an attorney that did not represent him,
8 and the attorney in question requested to be removed from the Colorado Secretary of
9 State's Filing record. That is in current process as the Secretary of State's office could
10 not give a definite time. That caused the corporation to restate and re-file the
11 incorporation documents, of Vegas Brand Enterprises Inc., that is the single member of
12 C-byte Computer Systems LLC. (Complainant). These domains <vegas.xxx>,
13 <vegas.im>, <vegas.gb.com>, <vegas.ar.com> were returned with prejudice, to the
14 Respondent upon cancellation of the Respondent's Shareholder status Notice the dates
15 Aug 7th 2013 that the Respondent updates the above domains. The Respondent was
16 removed from the Complainant's member corporation for conduct deemed improper,
17 and unfit by the standards of the corporation.

18

19 [a.] *(Specify in the space below the manner in which the domain name(s)*
20 *is/are identical or confusingly similar to a trademark or service mark in*
21 *which the Complainant has rights (UDRP Rule 3(b)(ix)(1); UDRP Policy*
22 *¶4(a)(i).*

23 The Respondent, knew ahead of time that selling and transferring the
24 domains <c-byte.com> and <c-byte.net> on February 8, 2013 and the
25 production of the EV SSL that C-Byte Computer Systems LLC would be
26 promoting the sale of computer equipment and software as a service to
27 USA and Colorado and international customers more particularly in the
28 hotel resort and casino businesses. Therefore any historic use of the
29 domains by the Respondent would cease to be relevant. Respondent
30 used Colorado address in email. The domains reflected the Colorado
31 physical address before hijack.

UDRP EXHIBIT C
PAGE 6 OF 28 PAGES
C-BYTE COMPANY

1 The Respondent knowingly acquired <c-bytecomputersystems.com> Aug
2 14, 2013 before hijacking the domains <c-byte.com> and <c-byte.net> on
3 Aug 16th, 2013.

UDRP EXHIBIT E
PAGE 6 OF 28 PAGES
C-BYTE CLUB

4
5 [b.] *Specify in the space below why the Respondent (domain-name holder)
6 should be considered as having no rights or legitimate interests in respect
7 of the domain name(s) that is/are the subject of the complaint.]* UDRP
8 Rule 3(b)(ix)(2); UDRP Policy ¶4(a)(ii).

9 The Respondent should have no rights to the domains because as
10 follows:

11
12 1/ On Aug 16, 2013 at 5:17 p.m., the Respondent hacked the C-byte
13 Computer System LLC account at Register.com and transferred the
14 domain to his own account at Register.com and then used the first
15 hacking to change the domain account <c-byte.net> at Name.com LLC to
16 his ownership, because he had access to the email addresses of <c-
17 byte.com>.

18
19 2/ On Aug 14th 2013 the Respondent registered <c-
20 bytecomputersystems.com> with Gandi and currently has it pointed to <c-
21 byte.com>. This hijacks the corporate identity and has the C-Byte
22 Computer Systems LLC green bar ssl currently displayed when a person
23 navigates to <vegas.xxx>.

24
25 3/ The hacking was done on a Friday at dinner time with the classic
26 hacking style of changing password first and then changing the email
27 address to his and then changed the phone number to his and moving the
28 domain.

UDRP EXHIBIT C
PAGE 7 OF 28 PAGES
C-BYTE COMPANY

1 We immediately complained to customer service at Register.com and by
2 email as per the received email notice of action as the phone number
3 refuses to update to the correct information.

UDRP EXHIBIT E
PAGE 7 OF 28 PAGES

4
5 The time spent and the cost of filing this complaint is a financial and
6 emotional burden. However, if the Complainant does not move forward
7 with it, the UDRP the Complainant will continue to be held responsible for
8 the deception and folly of the Respondent, as the domains current
9 represent as of this filing, online gaming.

10
11 4) The hacking of our account and impersonation of the Complainant
12 Manager at Register.com perpetrated by the Respondent, shall prove
13 beyond question, that the removal of the Respondent as technical support
14 from the Complainant's Register.com and Complainant's organization was
15 completely justified.

16
17 Consistent with false information the Respondent provided, the evidence
18 bears witness, that the Complainant had reasonable cause to find the
19 Respondent unfit for any business position in the Complainant's corporate
20 structure.

21
22 Therefore, the Complainant can make the reasonable judgment that the
23 Respondent would impersonate the Complainant without conscience
24 elsewhere in the cyber community, where hacking is the worst of offenses.

25
26 The Respondent is currently as of this filing using a Montana address
27 and C-Byte Inc and that corporate name is NOT registered to do business
28 in Montana as a domestic or foreign corporation and is still using the
29 green bar ssl from C-Byte Computer Systems. The domain
30 <onready.com> is the Respondents main domain for finding work on the
31 Internet and the email address used in the hijacking.

~~UDRP EXHIBIT C~~
~~PAGE 8 OF 28 PAGES~~
~~C-BYTE COMPANY~~

1 The goal of the hijacker was to make a false appearance that the
2 Manager of C-Byte Computer Systems LLC complied with his demands.

~~UDRP EXHIBIT E~~
~~PAGE 8 OF 28 PAGES~~
~~C-BYTE CLUB~~

3
4 [The Panel] may consider any relevant aspects included in, but not
5 limited to UDRP Policy ¶4(c) (i.) Whether, before any notice to the
6 Respondent of the dispute Respondent's use of, or demonstrable
7 preparations to use, the domain name or a name corresponding to the
8 domain name is in connection with a bona fide offering of goods or
9 services; or

10
11 The Respondent before notice of the dispute, threaten the Manager of C-
12 Byte Computer Systems LLC with nasty emails if the corporation was to
13 seek justice for the hijacking.

14
15 The Respondent sent spam emails to customers of Computer Parts Inc.
16 (Colorado) the hosting Company that the Respondent owed monies to.

17
18 It is our strong belief that the Respondent placed the domains in C-Byte
19 Computer Systems LLC corporate name deliberately, not only to have C-
20 Byte Computer Systems LLC cover debts to the shareholders of Vegas
21 Brand Enterprises Inc, and Computer Parts Inc (Colorado) but to have a
22 new identity. Director and Shareholders of C-Byte Computer Systems
23 LLC, single member Vegas Brand Enterprises Inc., did not fully
24 understand the importance of this to the Respondent until the demand in
25 late July to run illegal internet gambling and illegal auction software, from
26 the server located at WWQuote facility, as the Respondent's favorite
27 phrase "maximum return for very little effort". But when asked about the
28 basic legal issues including gambling license(s), shipping, warehousing
29 products to fund an auction or casino platform, the Respondent was short
30 on answers and long on "trust me, I have done this for a long time, with
31 important players like the Carbone family in Toronto, Canada " In using

UDRP EXHIBIT C
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C-BYTE.COMPARY

1 the identity of C-Byte Computer Systems LLC and confusing it with a
2 dissolved Alberta corporation C-Byte Inc, the Respondent would have
3 zero responsibility for following the laws of the Canada, Colorado or
4 Montana and the federal laws of United States. That would leave C-Byte
5 Computer Systems LLC holding the bag and responsible for dealing with
6 the fall out of the Respondents many lies.

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7
8 List of false information supplied by Respondent:

9
10 1/ C-Byte Inc is NOT a legitimate Alberta, Canada corporation, and/or
11 financing global projects

12
13 2/ The law firm:

14 c/o Kelly and Kelly Law Ofc
15 Percy Pyra
16 220 3505 32 Street NE
17 Calgary, Alberta Canada T1Y 5Y9
18

19 DID NOT represent the Respondent at the time the Complainant's
20 documents were filed with the Secretary of State (Colorado) confirmed this
21 in a phone conversation. The firm requested their information be removed
22 from the Colorado Secretary of State website.
23

24 3/ The software platforms were developed by the Respondent (false) are
25 copies that were supplied to him from various projects that he worked on.
26

27 4/ The Respondent wanted us to believe that the Carbone Family paid
28 for his ownership of <vegas.xxx>. The auction account looks like their
29 name was used (it does not state that they gave permission...
30

31 The following is true from our research:

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1 Fact: Canada's Alberta Justice Department Maintenance Enforcement
2 had served C-Byte Computer Systems LLC notice to receive payments
3 from any employment offered to the Respondent. The Respondent
4 absolutely refused to cooperate with the Alberta Maintenance
5 Enforcement program and vowed to never pay them and be the first
6 person in Canada to get away with it.

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8 The Respondent was assisting the Complainant and was considered an
9 employee until the separation; however, the Respondent would not supply
10 the documents to verify identity necessary to actual initialize the setup of
11 legal payroll with C-Byte Computer Systems LLC.

12
13 *ii.) Whether Respondent (as an individual, business, or other*
14 *organization) has been commonly known by the domain name, even if*
15 *Respondent has not acquired trademark or service mark rights; or*
16

17 The Respondent had used the domain for a number of years to promote
18 computer hardware and software services using the name C-Byte Inc., a
19 dissolved Alberta Corporation numbered corporation, before selling and
20 transferring the c-byte.com and c-byte.net domains to the corporation C-
21 Byte Computer Systems LLC February 8th 2013. After the transfer date
22 any history the domain had would cease to be relevant.

23
24 The August 14th 2013 before the hijacking of the domains <c-byte.com>
25 and <c-byte.net> the Respondent registered <c-
26 bytecomputersystems.com> with Gandi SAS.

27
28
29 *iii.) Whether Respondent is making a legitimate noncommercial or fair use of*
30 *the domain name, without intent for commercial gain to misleadingly divert*
31 *consumers or to tarnish the trademark or service mark at issue.]*

1 The Respondent is NOT making a legitimate noncommercial or fair use of
2 the domains in question as they were sold to the corporation C-Byte
3 Computer Systems LLC. Namely, the Respondent stole them when the
4 Complainant refused to break the laws of Colorado regarding online
5 gaming and auctions. This kind of operation carries fines and
6 imprisonment.

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8 The Respondent operates the hijacked the domains on a server plugged
9 in at WW Quote's operation in Calgary Alberta pretending to be C-Byte
10 Computer Systems LLC., (Colorado) using the green bar ssl issued to the
11 Complainant.

13 The Respondent has the domain <c-bytecomputersystems.com>, <c-
14 byte.net> and <vegas.xxx> resolved to <c-byte.com>.

16 In using the stolen domains and identity of the C-Byte Computer
17 Systems LLC Jeopardizes the corporation's financial stability not only with
18 the child maintenance issue in Alberta, server payments to WWQuote, but
19 the use of copyright materials and content that is contested by a media
20 group from Washington state.

22 [c.] *Specify in the space below why the domain name(s) should be*
23 *considered as having been registered and being used in bad faith.* UDRP-
24 Rule 3(b)(ix)(3); UDRP Policy ¶4(a)(iii). [The Panel may consider any
25 relevant aspects included in but not limited to UDRP Policy ¶4(b):

27 (i.) The Respondent has expertise in and works on server installations,
28 software as a service and router setup.

30 The Respondent hijacked the domains and registered <c-
31 bytecomputersystems.com> to acquire the corporate identity to

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1 hide from Alberta Justice Maintenance Enforcement program
2 because it is a USA company. The Respondent's use of the
3 domains in question would not allow the Complainant to recoup any
4 cost associated with the domains, sale of hardware, software, the
5 green bar ssl, office space and signage. Whatever history the
6 Respondent had with the domains in question became mute the
7 moment the domains <c-byte.com> and <c-byte.net> were
8 transferred to C-Byte Computer Systems LLC (Colorado) as clearly
9 evidenced in the record.

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10
11 (ii.) Whether Respondent (as an individual, business, or other
12 organization) has been commonly known by the domain name
13 Respondent has not acquired trademark or service mark rights, or
14

15 The Respondent first sold and transferred the domains <c-byte.com> and
16 <c-byte.net> to the Complainant and as the Complainant became more
17 aware of the Respondent continually providing false information and the
18 intent to knowingly break the gaming laws of Colorado, and would not
19 consider the consequences to the Complainant, et al., the Complainant
20 was ordered by the LLC member to end the relationship and contact. The
21 Respondent was removed from technical support at Register.com and
22 then made demands that he be given the domain authority codes
23 immediately. When the Complainant did not do as the Respondent
24 demanded, the Respondent simply stole the domains by hacking /
25 impersonation / of the account at Register.com. NOT only did the
26 Respondent NOT have the password to the Complainant account, the
27 Respondent had been specifically removed from the account as tech
28 support.

29
30 This is knowingly and intentionally attracting customers under false
31 pretence as there is no registered business in Montana and the site is, as

1 of this filing, using the Complainant's green bar ssl and the phone number
2 in the WHOIS record is an Alberta number that the Respondent uses
3 across other domain registrations. The WHOIS record should be as in this.

4
5 *(iii.) Whether Respondent has registered the domain name primarily for
6 the purpose of disrupting the business of a competitor, or*

7 The Respondent definitely registered <c-bytecomputersystems.com> to
8 distract potential customers away from the Complainant as this
9 registration was done two days before the other domains were hijacked.

10
11 *(iv.) Whether by using the domain name, Respondent has intentionally
12 attempted to attract, for commercial gain, Internet users to Respondent's
13 web site or other on-line location, by creating a likelihood of confusion with
14 the Complainant's mark as to the source, sponsorship, affiliation, or
15 endorsement of Respondent's web site or location or of a product or
16 service on Respondent's web site or location.)*

17 As of this filing, the Respondent has the domains <c-byte.net>, <c-
18 bytecomputersystems.com> and <vegas.xxx> resolving to <c-byte.com>
19 and is using the EV Green Bar SSL issued to the Complainant.

20
21 B. Respondent

22 Dominic,

23
24 I'm sending you this email in response to the Complaint noted above.

25
26 I affirm that:

- 27
28 1. C-Byte Computer Systems LLC does not hold a registered trademark, copyright or
29 patent, dated to 1989, in regards to anything related to <c-byte.com>.

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1 2. Attached is a press release dated January 15, 2006, provided by <prweb.com>,
2 dated long before any complaint send to this Respondent – This press release
3 demonstrates the use of the domain name in connection with a *bona fide* offering of
4 goods and services.

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5
6 3. The press release also provides evidence that the Respondent (as an individual,
7 business or other organization) has been commonly known by the domain name for
8 more than a decade, even if this Respondent has acquired no trademark or service
9 mark rights.

10
11 4. The press release also provides evidence that the Respondent is making a fair use of
12 the domain name, without intent to misleadingly divert consumers or to tarnish the
13 trademark or service mark of any individual, business or organization.

14
15 5. This Respondent certifies that the information contained in this Response is to the
16 best of Respondent's knowledge complete and accurate, that this Response is not
17 being presented for any improper purpose, such as to harass, and that the assertions in
18 this Response are warranted under these Rules and under applicable law, as it now
19 exists or as it may be extended by a good-faith and reasonable argument.

20
21 In summary, our group works very hard to make our products/services very attractive;
22 this does drive people to want what C-Byte has.

23
24 Unfortunately, this does drive people to attempt to hijack something that does not
25 belong to them, as in this case. I would ask that the panel member(s) dismiss this
26 complaint on the merit stated in my response above.

27
28 Please take note of my email address and telephone number below if you have any
29 further instructions, thank-you.

30
31 Regards,

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1 /s/ Trevor Biscope
 2
 3
 4 _____
 5 Corporate Headquarters ___/___ US/Canada Headquarters (NOC38)
 6 C-Byte Companies / Inside US Call: 1-800-393-5804
 7 P.O. Box 8496 / Outside US Call: 1-403-770-7818
 8 Kalispell, MT / Phone: (403) 770-7818 ext 8738
 9 U.S. 59904 / EMAIL: [redacted]

10
 11 C. Additional Submissions
 12 Respondent made an additional submission on October 9, 2013:

13
 14 Dominic,
 15
 16 Thank-you.

17
 18 There is no 'Trademark Dilemma' here, this is clearly a 'Reverse Domain Name
 19 Hijacking' attempt. The UDRP panelists are very familiar with this type of abuse of the
 20 UDRP process. Really other than just an unfair business practice - to file such
 21 complaints - I realize there is no tool to punish applicant's for the attempt.

22
 23 Please take note of my email address and telephone number below if you have any
 24 further instructions, thank-you.

25
 26 Regards,
 27 C-BYTE
 28
 29 Trevor Biscope

30
 31

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1 -----/-----
 2 Corporate Headquarters ___/___ US/Canada Headquarters (NOC38)
 3 C-Byte Group / Inside US Call: 1-800-393-5804
 4 P.O. Box 8486 / Outside US Call: 1-403-770-7818
 5 Kallspell, MT / Phone: (403) 770-7818 ext 8738
 6 U.S. 59904 / EMail: [redacted]
 7 -----/-----
 8

9 Complainant submitted the following Additional Submission on November 5,
10 2013:

11
 12 1/ Attached to the Response, the Respondent uses a promotional release that dates the
 13 use of the domain. The release is noted by the Respondent. In reviewing this exhibit,
 14 we have noted that the location Calgary AB and C-Byte Inc are prominently displayed.
 15 Attached is the NUANS report(s) that show this corporation was 'struck' June 2nd 2005,
 16 a term used by Canada to denote a company or corporation no longer doing business.
 17 The promotional statement is regarding a company that could NOT do business legally.
 18 This promotional statement is lacking the authenticity of a real corporation with a real
 19 business location. In a promotional/press release any statements made should be
 20 readily verifiable, and accurate. Not only have we shown in the main context of the
 21 complaint that the business name cannot be restated, we have add the list of the
 22 NUANS report to this additional submission.

23
 24 1/(a) Additional information is supplied regarding the use of the NUANS process adopted
 25 by
 26 Canada in registering a business, as does each state in the USA require a process to
 27 do business
 28 that meets certain criteria.

29
 30 1/(b) This raises all kinds of questions not answered by the Respondent, as how are
 31 taxes paid

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1 and why would government(s) do business with a company that lacks the minimum
2 business stature, that simply being, of the required registration, to be in business, in
3 the first place.

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4
5 1/(c) The whole goal of ICANN is to provide the public truth and accuracy of domain
6 registration, registrars are required to remind their clients to update the whois records
7 regularly
8 to preserve the integrity of the web as a whole.

9 C-Byte Inc simply no longer exists in the corporate world of Canada since 2005 and
10 cannot be revived. So the very basis of the Respondent's 2008 press release, as
11 grandiose as it sounds, is a falsehood. Among others, the domains <c-byte.com> and
12 <c-byte.net> were transferred to C-Byte Computer Systems LLC (Colorado) as outlined
13 in the Complainant's main document. What
14 happened before the transfer in February of 2013 is a mute argument.

15 2/(a) An Affidavit from the original file is re-scanned and added as the other scan
16 lacked details of the original document.

17
18 2 (b) Additional Affidavit from the member corporation, Secretary affirming the record.

19 3/ Attached our protest to Register.com and Name.com that the domain <c-byte.com>
20 had been removed from our Register.com account "cpi-ebiz" and moved to the
21 Respondent's account with Register.com letter to WWQuote, as that is where the server
22 is housed that is promoting illegal online gaming. We will never understand the
23 Register.com process of not listening to us that the domain was removed. The
24 Respondent took advantage of the process in that Register.com does not require an
25 email verification process that a password is to be changed Register.com sent an email
26 but the damage was done and continues to be done.

27 4/ Additional documents are identified as "UDRP <c-byte.com> Additional
28 Submissions."

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1 Respondent made the following additional submission on November 6, 2013:

2
3 Dominic,

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4
5 I'm sending you this email in response to the Complaint noted above.

6
7 I affirm that:

8
9 1. Absent of a Registered Trademark, the Complainant's affidavit speak to no credibility
10 whatsoever.

11
12 2. Attached is a press release dated April 21, 2005, provided by prweb.com, again
13 dated long before any complaint sent to this Respondent – The press release further
14 establishes, by use, as to the representation of the company and the product/services.

15
16 3. This Respondent has learned of the Complainant's registration of the domain names,
17 c-byte.us & c-byte.info, which currently point to pay-per-click advertisements.

18
19 4. Not only is the Complainant's registration and use of these domains reckless
20 endangerment, the Complainant's infringement undermines the credibility and trust that
21 consumers associate with delivery of very critical products/services. To that end, this
22 Respondent can bring a proceeding requiring the transfer of the domain names under
23 this Policy.

24
25 5. However, the Respondent is willing to give the Complainant an opportunity to rectify
26 the situation by immediately transferring the domain name's - c-byte.us & c-byte.info - to
27 this Respondent by unlocking the Domain Name for transfer with your registrar and
28 providing this Respondent with the EPP authorization codes.

29

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1 6. If this Respondent does not have a substantive response to these demands, this
2 Respondent will take the necessary steps, including but not limited to proceeding under
3 the UDRP, to enforce its rights against you.

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4
5 7. This Respondent certifies that the information contained in this Response is to the
6 best of Respondent's knowledge complete and accurate, that this Response is not
7 being presented for any improper purpose, such as to harass, and that the assertions in
8 this Response are warranted under these Rules and under applicable law, as it now
9 exists or as it may be extended by a good-faith and reasonable argument.

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10
11 In summary, with a substantial increase in cybersquatting, and reverse domain hijacking
12 - a clear message needs to be sent - we will not allow consumers to be misled.

13
14 I rest,

15
16 /s/ Trevor Biscope

17
18
19 _____
20 Corporate Headquarters / US/Canada Headquarters (NOC38)
21 C-Byte Companies / Inside US Call: 1-800-393-5804
22 P.O. Box 8496 / Outside US Call: 1-403-770-7818
23 Kalispell, MT / Phone: (403) 770-7818 ext 8738
24 U.S. 59904 / EMail: [redacted]

25
26
27 In response to the Panel's order the parties' submissions should be provided in a word
28 process format within 10 days, Respondent emailed:

29
30 Dominic,

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1 There's no ICANN rule that requires me to purchase a copy of Microsoft Word, or
2 Word Perfect.

3
4 If your guy can't open an email and read it, then he should be in another line of
5 work.

6
7 -TB

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8
9 Complainant complied with the Panel's additional submission order.

10
11 All additional submissions were considered.

12
13 **Preliminary Issue: Multiple Respondents**

14 In the instant proceedings, the entities which control the domain names at issue are
15 effectively controlled by the same person and/or entity, which is operating under several
16 slightly different aliases. Paragraph 3(c) of the Rules for Uniform Domain Name
17 Dispute Resolution Policy (the "Rules") provides that a "complaint may relate to more
18 than one domain name, provided that the domain names are registered by the same
19 domain name holder." Respondent ("Trevor Biscope/C-Byte, Inc.") appears to have
20 registered the <c-byte.com> and <c-byte.net> domain names under both Trevor
21 Biscope and C-Byte, Inc. The <c-bytecomputersystems.com> domain name is
22 registered to Trevor Biscope alone.

23
24 While Complainant *pro se* complaint is so inarticulate it borders on the
25 incomprehensible, this Panel finds the disputed domain names are all controlled by a
26 single entity, Trevor Biscope (who does not seem to contest the issue).

27
28 It should be noted Trevor Biscope previously sold Complainant the <c-byte.com> and
29 <c-byte.net> domain names.

30

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1 FINDINGS

- 2 (1) the domain name registered by Respondent is identical or confusingly
- 3 similar to a trademark or service mark in which Complainant has rights;
- 4 and
- 5 (2) Respondent has no rights or legitimate interests in respect of the domain
- 6 name; and
- 7 (3) the domain name has been registered and is being used in bad faith.

8
9 DISCUSSION

10 Paragraph 15(a) of the Rules instructs this Panel to "decide a complaint on the
11 basis of the statements and documents submitted in accordance with the Policy,
12 these Rules and any rules and principles of law that It deems applicable."
13

14 Paragraph 4(a) of the Policy requires that Complainant must prove each of the
15 following three elements to obtain an order that a domain name should be
16 cancelled or transferred:

- 17
- 18 (1) the domain name registered by Respondent is identical or confusingly
- 19 similar to a trademark or service mark in which Complainant has rights;
- 20 and
- 21 (2) Respondent has no rights or legitimate interests in respect of the domain
- 22 name; and
- 23 (3) the domain name has been registered and is being used in bad faith.

24
25 Identical and/or Confusingly Similar

26 Once again, the Panel notes Complainant's Complaint is very difficult to understand and
27 was obviously written by a *pro se*. While that does not change the burden of proof, this
28 Panel tries to understand the essence of what the parties are trying to say. In this case,
29 the Panel has relied extensively on the documents provided by both parties since
30 neither of their written submissions were particularly helpful. The fact Complainant took

1 no action because Complainant didn't have adequate funds does not affect the Panel's
2 analysis in this proceeding.
3
4 Complainant is a single member limited liability corporation formed on February 5, 2013
5 under the laws of Colorado. Complainant has used the <c-byte.com> and <c-byte.net>
6 domain names to sell software and services to the public. While Complainant has not
7 registered its C-BYTE mark with any trademark authority, Policy ¶4(a)(i) does not
8 require Complainant to register its trademark as long as it can demonstrate common
9 law rights in the mark pursuant to Policy ¶4(a)(i). See *Zee TV USA, Inc. v. Siddiqi*, FA
10 721969 (Nat. Arb. Forum July 18, 2006) (finding that the complainant need not own a
11 valid trademark registration for the ZEE CINEMA mark in order to demonstrate its rights
12 in the mark under Policy ¶4(a)(i)).

13
14 Complainant acquired the <c-byte.com> and <c-byte.net> domain names from
15 Respondent, the original owner, on February 8, 2013. Following Complainant's
16 acquisition of the <c-byte.com> and <c-byte.net> domain names, Complainant invested
17 in an EV SSL (green bar ssl) through Computer Parts Inc. (Colorado) program with
18 Starfield Tech for <c-byte.com>. In *Goepfert v. Rogers*, FA 861124 (Nat. Arb. Forum
19 Jan. 17, 2007), the panel held that "[T]here is no particular amount of evidence required
20 in order to establish common law rights. The determination of what is sufficient is ad
21 hoc based on the specific facts and circumstances involved, as is the scope of the rights
22 once established." Complainant has provided sufficient evidence to prove secondary
23 meaning in its C-BYTE mark. Complainant has sufficiently proved its rights in the C-
24 BYTE mark under Policy ¶4(a)(i).

25
26 Respondent's <c-byte.com> and <c-byte.net> domain names are identical to
27 Complainant's C-BYTE mark. Respondent incorporates Complainant's C-BYTE mark
28 and simply adds the generic top-level domains ("gTLD") ".com" or ".net." The addition of
29 a gTLD is irrelevant to a Policy ¶4(a)(i) analysis. See *Red Hat, Inc. v. Haecke*, FA
30 726010 (Nat. Arb. Forum July 24, 2006) (concluding that the <redhat.org> domain name
31 is identical to the complainant's RED HAT mark because the mere addition of gTLD was

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1 insufficient to differentiate the disputed domain name from the mark). Accordingly,
2 Respondent's <c-byte.com> and <c-byte.net> domain names are identical to
3 Complainant's C-BYTE mark under Policy ¶4(a)(i).

4
5 Respondent's <c-bytecomputersystems.com> domain name is confusingly similar to
6 Complainant's C-BYTE mark. Respondent includes Complainant's entire C-BYTE mark
7 and merely adds the descriptive phrase "computersystems" (which also happens to be
8 part of Complainant's name). In *Experian Info. Solutions, Inc. v. Credit Research, Inc.*,
9 D2002-0095 (WIPO May 7, 2002), the panel found that several domain names
10 incorporating the complainant's entire EXPERIAN mark and merely adding the term
11 "credit" were confusingly similar to the complainant's mark. Respondent's addition of a
12 descriptive word does not affect a Policy ¶4(a)(i) determination. Adding a gTLD ".com"
13 to Complainant's mark for its disputed domain name may also be disregarded because
14 domain name syntax requires either a gTLD or ccTLD. Respondent's addition of a gTLD
15 does not adequately differentiate the domain name from Complainant's mark under
16 Policy ¶4(a)(i). See *Bank of Am. Corp. v. McCall*, FA 135012 (Nat. Arb. Forum Dec. 31,
17 2002) (holding that attaching a gTLD is "unable to create a distinction capable of
18 overcoming a finding of confusing similarity"). Respondent's <c-
19 bytecomputersystems.com> domain name is confusingly similar to Complainant's C-
20 BYTE mark pursuant to Policy ¶4(a)(i).

21
22 The Panel finds Policy ¶4(a)(i) satisfied.

23
24 Rights or Legitimate Interests

25 Complainant must first make a *prima facie* case Respondent lacks rights and legitimate
26 interests in the disputed domain name under Policy ¶4(a)(ii). Then burden shifts to
27 Respondent to show it does have rights or legitimate interests. See *Hanna-Barbera*
28 *Prods., Inc. v. Entm't Commentaries*, FA 741828 (Nat. Arb. Forum Aug. 18, 2006)
29 (holding that the complainant must first make a *prima facie* case that the respondent
30 lacks rights and legitimate interests in the disputed domain name under UDRP ¶4(a)(ii)
31 before the burden shifts to the respondent to show that it does have rights or legitimate

1 interests in a domain name); *see also AOL LLC v. Gerberg*, FA 780200 (Nat. Arb.
2 Forum Sept. 25, 2006) (“Complainant must first make a prima facie showing that
3 Respondent does not have rights or legitimate interest in the subject domain names,
4 which burden is light. If Complainant satisfies its burden, then the burden shifts to
5 Respondent to show that it does have rights or legitimate interests in the subject domain
6 names.”).

7
8 First of all, Respondent sold the <c-byte.com> and <c-byte.net> domain names to
9 Complainant's agent on February 8, 2013 (when they were immediately placed into
10 Complainant's name). When that occurred, Respondent transferred all of his rights to
11 Complainant. Respondent has done nothing to show what rights he acquired since re-
12 acquiring the <c-byte.com> and <c-byte.net> domain names.

13
14 Complaint claims Respondent stole the <c-byte.com> and <c-byte.net> domain names
15 on August 16, 2013. Respondent has not denied this allegation and has merely said
16 this is a dispute between two people who have equal rights to a mark. This Panel does
17 not think so and adopts the common law maxim that a thief cannot acquire any rights,
18 especially rights against the true owner.

19
20 Respondent is not commonly known by the <c-byte.com>, <c-byte.net>, <c-
21 bytecomputersystems.com> domain names. The WHOIS information identifies the
22 registrant of the domain names as “Trevor Biscope / C-Byte, Inc.” There is no C-Byte,
23 Inc. in Montana, at least according to the Montana Secretary of State. Respondent has
24 shown no information which would suggest C-Byte, Inc. exists anywhere.

25
26 Respondent's January 15, 2008 press release means nothing because Respondent
27 sold his rights to Complainant on February 8, 2013. The Panel finds Respondent is not
28 commonly known by the <c-byte.com>, <c-byte.net>, <c-bytecomputersystems.com>
29 domain names under Policy ¶4(c)(ii).

30

1 Complainant claims Respondent is using the <c-byte.com>, <c-byte.net>, <c-
2 bytecomputersystems.com> domain names to offer free membership in illegal online
3 gambling operation. Respondent's disputed domain names resolve to a webpage titled
4 "vegas brand," listing online games such as "Poker, Backgammon, and Mahjong." In
5 *Nycomed Danmark ApS v. Diaz*, D2006-0779 (WIPO Aug. 15, 2006), the panel
6 concluded that respondent's use of a disputed domain name to operate a website
7 promoting an illegal food supplement was not a *bona fide* offering of goods or services
8 under Policy ¶4(c)(i) or a legitimate noncommercial or fair use under Policy ¶4(c)(iii).
9 This Panel finds Respondent's use of the disputed domain names to provide an illegal
10 use or services does not constitute a Policy ¶4(c)(i) *bona fide* offering of goods or
11 services or a Policy ¶4(c)(iii) legitimate noncommercial or fair use.

12
13 It should also be noted Respondent deliberately provided false contact information
14 when Respondent registered the disputed domain names. This prevents Respondent
15 from acquiring any rights to the domain names under the UDRP.

16
17 Respondent claims this matter is outside the UDRP (and also essentially tells
18 Complainant "you will rue the day you fired me"). This is not a case where Complainant
19 authorized Respondent to register a domain name in Respondent's own name.
20 Complainant owned the <c-byte.com> and <c-byte.net> domain names. There were
21 properly registered in Complainant's own name. The fact Respondent stole them does
22 not remove this matter from the UDRP because this is suddenly and exclusively a
23 "contractual dispute."

24
25 The Panel finds Policy ¶4(a)(ii) satisfied.

26 Registration and Use in Bad Faith

27
28 Complainant claims Respondent registered <c-bytecomputersystems.com> to distract
29 potential customers away from Complainant. Respondent registered the <c-
30 bytecomputersystems.com> domain name two days before the <c-byte.com> and <c-
31 byte.net> domain names were hijacked. Respondent's disputed domain names resolve

1 to a webpage titled "vegas brand," listing online games such as "Poker, Backgammon,
2 and Mahjong." While panels typically do not find disruption where Respondent uses the
3 disputed domain names for a purpose unrelated to Complainant, this Respondent had
4 the specific *animus* to harm Complainant and said so. There is no better way to prove
5 bad faith use and registration than having Respondent admit it in an email to
6 Complainant.

7
8 Respondent has the domains <c-byte.net>, <c-bytecomputersystems.com>, and
9 <vegas.xxx> resolving to <c-byte.com> and is using the EV Green Bar SSL issued to
10 Complainant (which he presumably had access to as Complainant's former employee,
11 something Respondent does not deny). Respondent's disputed domain names resolve
12 to a webpage titled "vegas brand," listing online games such as "Poker, Backgammon,
13 and Mahjong." Respondent presumably commercially benefits through its use of the <c-
14 byte.com>, <c-byte.net>, and <c-bytecomputersystems.com> domain names to provide
15 illegal gambling services. Therefore, this Panel finds Respondent's use of the disputed
16 domain names to provide illegal online gambling services shows bad faith under Policy
17 ¶4(b)(iv). *See Mars, Inc. v. Double Down Magazine*, D2000-1644 (WIPO Jan. 24, 2001)
18 (finding bad faith under Policy ¶4(b)(iv) where the respondent linked the domain name
19 <marssmusic.com>, which is identical to the complainant's mark, to a gambling
20 website).

21
22 On August 16, 2013, Respondent hacked Complainant's account at Register.com and
23 transferred the <c-byte.com> domain to his own account at Register.com and then used
24 the first hacking to change the domain account <c-byte.net> at Name.com LLC to his
25 ownership, because he had access to the email addresses of <c-byte.com>. In
26 *Swaningson v. thu lins*, FA 1264365 (Nat. Arb. Forum July 1, 2009), the panel held
27 Respondent's illegal action of hacking Complainant's registration account was evidence
28 Respondent registered and was using the disputed domain name in bad faith pursuant
29 to Policy ¶4(a)(iii). Respondent's hacking of the <c-byte.com> and <c-byte.net> domain
30 names constitutes bad faith under Policy ¶4(a)(iii).

1 Respondent knew before he sold and transferred the <c-byte.com> and <c-byte.net>
 2 domains to Complainant on February 8, 2013 and Complainant acquired the EV SSL,
 3 that Complainant would be promoting the sale of computer equipment and software.
 4 Respondent obviously knew of Complainant's rights in the domain names due to
 5 Respondent's transfer of the <c-byte.com> and <c-byte.net> domain names to
 6 Complainant on February 8, 2013. Respondent had actual knowledge of Complainant's
 7 mark and rights and Respondent registered the <c-byte.com>, <c-byte.net>, and <c-
 8 bytecomputersystems.com> domain names in bad faith under Policy ¶4(a)(iii). See
 9 *Minicards Vennootschap Onder Firma Amsterdam v. Moscow Studios*, FA 1031703
 10 (Nat. Arb. Forum Sept. 5, 2007) (holding that respondent registered a domain name in
 11 bad faith under Policy ¶4(a)(iii) after concluding that respondent "actual knowledge of
 12 Complainant's mark when registering the disputed domain name").

13

14 Respondent is also using the disputed domain name to deliberately injure
 15 Complainant's business reputation by impersonating her. That isn't a good faith
 16 registration and use of the disputed domain names.

17

18 The Panel finds Policy ¶4(a)(iii) satisfied.

19


20 **DECISION**

21 Having established all three elements required under the ICANN Policy, the
 22 Panel concludes relief shall be GRANTED.

23

24 Accordingly, It Is Ordered the <c-byte.com>, <c-byte.net>, and
 25 <cbytecomputersystems.com> domain names be TRANSFERRED from
 26 Respondent to Complainant.

27



 Houston Potnam Lowry, Esq.
 Arbitrator

28

UDRP EXHIBIT *E*
PAGE *28* OF *28* PAGES
C-BYTE.CLUB

UDRP EXHIBIT *C*
PAGE *28* OF *28* PAGES
C-BYTE.COMPANY

1
2
3
4
5

Houston Putnam Lowry, Chartered Arbitrator, Panelist

Dated: Thursday, November 21, 2013

NB:

COPY OF UDRP DECISION "C-BYTE"

LINE AND PAGE NUMBERS ADDED BY

C-BYTE COMPUTER SYSTEMS LLC (COMPLAINANT)

Print | Close Window

Subject: Re: Fwd: invoice Computer Parts Inc (Colorado) USA (fwd)
From: "Trevor[TeamC-Byte]" <biscope@c-byte.company>
Date: Sun, May 04, 2014 4:45 pm
To: admin@cpl-ebiz.com

LMAO - pissy are we - I will do as I like there Wanda, and there is nothing you are going to do about it - oh dilusional one - LMAO.

>
> ----- Forwarded message -----
> From: C-ByteDirect [TeamC-Byte] <direct@c-byte.net>
> Date: Thu, May 1, 2014 at 1:53 PM
> Subject: invoice Computer Parts Inc (Colorado) USA
> To: Ashu Gandhi <gandhiashu@gmail.com>
> Cc: admin@cpl-ebiz.com
>
>
> Ashu,
> Be advised that Computer Parts Inc (Colorado) USA an
> affiliate of C-Byte Computer Systems LLC (Colorado) USA
> has received invoices up to March of this year since
> last August 2013, you were advised by email and phone
> that
> Trevor Biscope is no longer working for or affiliated
> with our company.
> If the server is still in operation using our identity
> illegally,
> in 20 days we will be present to remove it.
> Thank you
> Wanda Brink Manager,
> C-Byte Computer Systems LLC (Colorado) USA
> www.c-byte.com
> Tre
>

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[Print](#) | [Close Window](#)

Subject: bject: [legal #4866412] [FWD: RE: C-Byte Computer Systems LLC v Trevor Biscope / C-Byte, Inc., FA1310001523522]
From: "C-Byte Computer Systems LLC (Colorado)" <admin@c-byte.us>
Date: Fri, May 02, 2014 9:33 am
To: legal@support.gandi.net
Attach: c-byte company registration GANDI 4 26 2014.pdf
c-byte management 4 26 2014.pdf
c-byte solutions 4 26 2014.pdf
c-byte support 4 26 2014.pdf
C-Byte Systems 4 26 2014.pdf

Dear Sir,
Attached are the whois records showing that Mr Biscope registered our trademark 5 more times with your company on April the 26th 2014. This is clearly in defiance of the generic TLD rules and agreements and the recent UDRP case for the brand/trademark "c-byte".
This is clearly cyber-squatting and the attached emails show a clear intent to harm us.
Do you have anything process in place that can assist us?
Wanda Brink
C-Byte Computer Systems LLC (Colorado) USA
www.c-byte.us

----- Original Message -----

Subject: DECISION - C-Byte Computer Systems LLC v Trevor Biscope / C-Byte, Inc., FA1310001523522
From: "C-Byte Computer Systems LLC (Colorado)" <admin@c-byte.us>
Date: Thu, May 01, 2014 10:15 pm
To: "Dominic D." <DominicD@adrforum.com>
Cc: "David Sandler" <davidsandler@eddysandler.com>

Dominic,

We have included this email received today by our hosting company, Computer Parts Inc (Colorado) from biscope@c-byte.company , as evidence of Mr Biscope ongoing disregard for facts, process of law, rules and regulations attached are 5 c-byte generic domains/ whois records/ registered with GANDI on Apr 26th 2014 in defiance of the arbitration decision. This is clearly cyber squatting with intent to harm us. Please advise us as to the correct ICANN/DONUTS procedure to address this.

Wanda Brink
C-Byte Computer Systems LLC (Colorado) USA
www.c-byte.us

PS Additionally in Dec 2013 Biscope registered c-byte.us.com included copy (an email cc: to us on Apr 23rd addressed to yourself)
cc: David Sandler

----- Original Message -----

Subject: Re: Fwd: invoice Computer Parts Inc (Colorado) USA
From: "Trevor[TeamC-Byte]" <biscope@c-byte.company>
Date: Thu, May 01, 2014 5:43 pm
To: admin@cpi-ebiz.com

Wanda,

Your employment with C-Byte has been terminated over 12 months. Your acts of contacting C-Byte vendors is considered reckless and endangering - you have been reported to the FBI organized crime and fraud.

Regards,
C-BYTE

Trevor Biscope

COPY of earlier email

Message Detail

Subject: RE: [abuse #4864719] [GANDI] Regarding the application of the decision C-Byte Computer Systems LLC v Trevor Biscope / C-Byte, Inc., FA1310001523522
From: "Trevor[TeamC-Byte]" <biscope@c-byte.com> (Add as Preferred Sender)
Date: Wed, Apr 23, 2014 9:35 am
To: "Dominic D." <DominicD@adrforum.com>
Cc: "abuse@support.gandi.net" <abuse@support.gandi.net>, "admin@c-byte.us" <admin@c-byte.us>

Dominic,

National Arbitration Forum is a corporation, with absolutely no legal ability in front of the court in any country.

The judge issued instructions for further documentation, and service on Wanda Brink. Mrs. Brink has avoided service, therefore, we're not able to complete the affidavit of service to bring her in front of the judge.

Mrs. Brink is to answer to the judge for her misgivings here.

Regards,
Trevor Biscope

*****END COPY*****

Tuesday, September 24, 2013
2:37 PM

UDRP EXHIBIT P
PAGE 4 OF 6 PAGES
C-BYTE.CLUB

Print | Close Window

Subject: Re: C-BYTE

From: "Trevor[TeamC-Byte]" <biscope@c-bytecomputersystems.com>

Date: Thu, Aug 15, 2013 3:04 pm

To: admin@vegasbrandenterprises.com

Have no delusions, I will continue on, the very very sad part is, you will never live this down.

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Inserted from <https://email21.secureserver.net/view_print_multi.php?uidArray=

EXHIBIT 21A
PAGE 5 OF 9 PAGES

Subject: loose

From: onready <onready@gmail.com>

Date: Tue, Sep 03, 2013 9:01 am

To: "Computer Parts Inc (Colorado)" <admin@cpi-ebiz.com>

you will only loose in a fight with me, and believe me, I will end it

UDRP EXHIBIT P
PAGE 5 OF 6 PAGES
C-BYTE.CLUB

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~~EXHIBIT 21 B
PAGE 5 OF 9 PAGES~~

Subject: viva vegas :)
From: "Trevor[TeamVegas]" <trevor@vegas.xxx>
Date: Tue, Sep 03, 2013 4:43 pm
To: admin@cpi-ebiz.com

UDRP EXHIBIT P
PAGE 6 OF 6 PAGES
C-BYTE.CLUB

lol

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~~EXHIBIT 21c
PAGE 5 OF 9 PAGES~~

From: TMOOfficialNotices@USPTO.GOV
Sent: Tuesday, August 18, 2015 00:33 AM
To: rich@newmanlawlv.com
Subject: Official USPTO Notice of Publication Confirmation: U.S. Trademark SN 86571876: C-BYTE: Docket/Reference No. 10141.00005

TRADEMARK OFFICIAL GAZETTE PUBLICATION CONFIRMATION

U.S. Serial Number: 86571876
Mark: C-BYTE
International Class(es): 042
Owner: Trevor Biscope
Docket/Reference Number: 10141.00005

The mark identified above has been published in the Trademark Official Gazette (TMOG) on Aug 18, 2015.

To Review the Mark in the TMOG:

Click on the following link or paste the URL into an internet browser: <https://tmog.uspto.gov/#issueDate=2015-08-18&serialNumber=86571876>

On the publication date or shortly thereafter, the applicant should carefully review the information that appears in the TMOG for accuracy. If any information is incorrect due to USPTO error, the applicant should immediately email the requested correction to TMPostPubQuery@uspto.gov. For applicant corrections or amendments after publication, please file a post publication amendment using the form available at <http://teasroa.uspto.gov/ppa/>. For general information about this notice, please contact the Trademark Assistance Center at 1-800-786-9199.

Significance of Publication for Opposition:

- * Any party who believes it will be damaged by the registration of the mark may file a notice of opposition (or extension of time therefor) with the Trademark Trial and Appeal Board. If no party files an opposition or extension request within thirty (30) days after the publication date, then eleven (11) weeks after the publication date a certificate of registration should issue.

To check the status of the application, go to http://tsdr.uspto.gov/#caseNumber=86571876&caseType=SERIAL_NO&searchType=statusSearch or contact the Trademark Assistance Center at 1-800-786-9199. Please check the status of the application at least every three (3) months after the application filing date.

To view this notice and other documents for this application on-line, go to http://tsdr.uspto.gov/#caseNumber=86571876&caseType=SERIAL_NO&searchType=documentSearch. NOTE: This notice will only become available on-line the next business day after receipt of this e-mail.

UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451
General Contact Number: 571-272-8500

Wanda Brink
C-Byte Computer Systems LLC
185 Broadway Ave
Alamosa, CO 81101

Mailed: September 16, 2015

Serial No.: 86571876
ESTTA TRACKING NO: ESTTA696174

The request to extend time to oppose is granted until **10/17/2015** on behalf of potential opposer **C-Byte Computer Systems LLC**

Please do not hesitate to contact the Trademark Trial and Appeal Board at (571)272-8500 if you have any questions relating to this extension.

Note from the Trademark Trial and Appeal Board

TTAB forms for electronic filing of extensions of time to oppose, notices of opposition, petition for cancellation, notice of ex parte appeal, and inter partes filings are now available at <http://estta.uspto.gov>. Images of TTAB proceeding files can be viewed using TTABVue at <http://ttabvue.uspto.gov>.



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Electronic System for Trademark Trials and Appeals

Receipt

Your submission has been received by the USPTO.
The content of your submission is listed below.
You may print a copy of this receipt for your records.

ESTTA Tracking number: ESTTA696174

Filing date: 09/16/2015

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Applicant: Trevor Biscope
Application Serial Number: 86571876
Application Filing Date: 03/20/2015
Mark: C-BYTE
Date of Publication 08/18/2015

First 30 Day Request for Extension of Time to Oppose

Pursuant to 37 C.F.R. Section 2.102, C-Byte Computer Systems LLC, 185 Broadway Ave, Alamosa, CO 81101, UNITED STATES, a corporation organized under the laws of Colorado, respectfully requests that it be granted a 30-day extension of time to file a notice of opposition against the above-identified mark.

The time within which to file a notice of opposition is set to expire on 09/17/2015. C-Byte Computer Systems LLC respectfully requests that the time period within which to file an opposition be extended until 10/17/2015.

Respectfully submitted,
/Wanda Brink/
09/16/2015
Wanda Brink
Manager
C-Byte Computer Systems LLC
185 Broadway Ave
Alamosa, CO 81101
UNITED STATES
admin@c-byte.com
719-480-3932

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NATIONAL ARBITRATION FORUM

DECISION

C-Byte Computer Systems LLC (Colorado) v. Trevor Biscope

Claim Number: FA1405001562032

PARTIES

Complainant is **C-Byte Computer Systems LLC (Colorado)** ("Complainant"), represented by Wanda Brink of C-Byte Computer Systems LLC (Colorado) USA, Colorado. Respondent is **Trevor Biscope** ("Respondent"), Nevada.

REGISTRAR AND DISPUTED DOMAIN NAMES

The domain names at issue are <c-byte.company>, <c-byte.management>, <c-byte.solutions>, <c-byte.support>, and <c-byte.systems>, registered with **Gandi SAS**.

PANEL

The undersigned certifies that he has acted independently and impartially and to the best of his knowledge has no known conflict in serving as Panelist in this proceeding.

Debrett G. Lyons as Panelist.

PROCEDURAL HISTORY

Complainant submitted a Complaint to the National Arbitration Forum electronically on May 29, 2014; the National Arbitration Forum received payment on May 29, 2014.

On June 3, 2014, Gandi SAS confirmed by e-mail to the National Arbitration Forum that the <c-byte.company>, <c-byte.management>, <c-byte.solutions>, <c-byte.support>, and <c-byte.systems> domain names are registered with Gandi SAS and that Respondent is the current registrant of the names. Gandi SAS has verified that Respondent is bound by the Gandi SAS registration agreement and has thereby agreed to resolve domain disputes brought by third parties in accordance with ICANN's Uniform Domain Name Dispute Resolution Policy (the "Policy").

On June 5, 2014, the Forum served the Complaint and all Annexes, including a Written Notice of the Complaint, setting a deadline of June 25, 2014 by which Respondent could file a Response to the Complaint, via e-mail to all entities and persons listed on Respondent's registration as technical, administrative, and billing contacts, and to postmaster@c-byte.company, postmaster@c-byte.management, postmaster@c-byte.solutions, postmaster@c-byte.support, and postmaster@c-byte.systems. Also on June 5, 2014, the Written Notice of the Complaint, notifying Respondent of the e-mail addresses served and the deadline for a Response, was transmitted to Respondent via post and fax, to all entities and persons listed on Respondent's registration as technical, administrative and billing contacts.

Having received no response from Respondent, the National Arbitration Forum transmitted to the parties a Notification of Respondent Default.

On July 3, 2014, pursuant to Complainant's request to have the dispute decided by a single-member Panel, the National Arbitration Forum appointed Debrett G> Lyons as Panelist.

Having reviewed the communications records, the Administrative Panel (the "Panel") finds that the National Arbitration Forum has discharged its responsibility

under Paragraph 2(a) of the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules") "to employ reasonably available means calculated to achieve actual notice to Respondent" through submission of Electronic and Written Notices, as defined in Rule 1 and Rule 2. Therefore, the Panel may issue its decision based on the documents submitted and in accordance with the ICANN Policy, ICANN Rules, the National Arbitration Forum's Supplemental Rules and any rules and principles of law that the Panel deems applicable, without the benefit of a formal response from Respondent.

Panel notes informal communication with the Forum by Respondent (and a retort by Complainant) which it has disregarded as being largely irrelevant to the key issues to be determined.

RELIEF SOUGHT

Complainant requests that the domain names be transferred from Respondent to Complainant.

PARTIES' CONTENTIONS

A. Complainant

Complainant asserts trademark rights in C-BYTE and alleges that the disputed domain names are confusingly similar to its trademark.

Complainant alleges that Respondent has no rights or legitimate interests in the disputed domain names.

Complainant alleges that Respondent registered and used the disputed domain names in bad faith.

B. Respondent

Respondent failed to submit a formal Response in this proceeding.

FINDINGS

The factual findings pertinent to the decision in this case are that:

1. Complaint creates hardware/software for use by hotels, motels, lodges and casinos which it sells promotes and sells by reference to the trademark C-BYTE;
2. The disputed domain names were registered in on April 26, 2014;
3. The domain names resolve to an online gambling website;
4. There is no commercial agreement between the parties and Complainant has not authorized Respondent to use its trademark or to register any domain name incorporating its trademark.
5. The parties have been involved in earlier UDRP proceedings involving the same trademark (*C-byte Computer Systems LLC v. Trevor Biscope/C-Byte, Inc.*, FA Number 1523522 (Nat. Arb. Forum November 21, 2013)).

DISCUSSION

Paragraph 15(a) of the Rules instructs this Panel to "decide a complaint on the basis of the statements and documents submitted in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable."

Paragraph 4(a) of the Policy requires that Complainant must prove each of the following three elements to obtain an order that a domain name should be cancelled or transferred:

- (1) the domain name registered by Respondent is identical or confusingly similar to a trademark or service mark in which Complainant has rights; and
- (2) Respondent has no rights or legitimate interests in respect of the domain name; and
- (3) the domain name has been registered and is being used in bad faith.

In view of Respondent's failure to submit a response, the Panel shall decide this administrative proceeding on the basis of Complainant's undisputed representations pursuant to paragraphs 5(e), 14(a) and 15(a) of the Rules and draw such inferences it considers appropriate pursuant to paragraph 14(b) of the Rules.

Procedural Issue: Concurrent Court Proceedings

Complaint references other active legal proceedings between the parties, namely, a complaint with the Federal Bureau Cyber Crime unit; a complaint with the Federal Trade Commission; a complaint with Homeland Security and the Post Office; and a personal protection order filed by Complainant with the County of Alamosa Colorado.

Panel finds that none of those matters has a direct bearing on the disputed domain name or will result in a determination which adjudicates on the disposition of the domain name. Panel accordingly proceeds to apply the Policy in the usual manner (see *eProperty Direct LLC v. Miller*, FA 836419 (Nat. Arb. Forum Jan. 3, 2007) holding that the panel could decide the dispute under Rule 18(a) of the Policy "since the legal proceedings referred to by the parties appear to be concluded and Orders made. Moreover,... those Orders do not touch directly on the disposition of the disputed domain name or on the parties' intellectual property rights.").

Identical and/or Confusingly Similar

Paragraph 4(a)(i) of the Policy requires a two-fold enquiry – a threshold investigation into whether a complainant has rights in a trademark, followed by an assessment of whether the disputed domain name is identical or confusingly similar to that trademark.

Paragraph 4(a)(i) of the Policy does not distinguish between registered and unregistered trademark rights. There is no evidence that Complainant has a relevant trademark registration. Instead it relies on an allegation of common law rights and rests its claim wholly on a prior determination of that point by another panel in earlier UDRP proceedings between the parties.

In the case of *C-byte Computer Systems LLC v. Trevor Biscope/C-Byte, Inc.*, FA 1523522, the panel ordered transfer of <c-byte.com>, <c-byte.net>, and <c-bytecomputersystems.com> from Respondent to Complainant. The panelist found that Complainant had shown trademark rights in C-BYTE under paragraph 4(a)(i). This Panel is not able to appraise the evidence of use of the trademark upon which that finding of common law rights was based but in the absence of a Response and any contest by Respondent has no reason to question whether or not those rights exist. Panel accepts that Complainant has trademark rights in C-BYTE.

Panel is also satisfied that the disputed domain names are legally identical to Complainant's trademark since in each case the domain name takes the trademark and merely adds one or other gTLD extension (see *Rollerblade, Inc. v. McCrady*, D2000-0429 (WIPO June 25, 2000) finding that the top level of the domain name such as ".net" or ".com" does not affect the domain name for the purpose of determining whether it is identical or confusingly similar).

Panel finds that Complainant has satisfied the requirements of paragraph 4(a)(i) of the Policy.

Rights or Legitimate Interests

Paragraph 4(c) of the Policy states that any of the following circumstances, in particular but without limitation, if found by the Panel to be proved based on its

evaluation of all evidence presented, shall demonstrate rights or legitimate interests to a domain name for purposes of paragraph 4(a)(ii) of the Policy:

(i) before any notice to you of the dispute, your use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a *bona fide* offering of goods or services; or

(ii) you (as an individual, business, or other organization) have been commonly known by the domain name, even if you have acquired no trademark or service mark rights; or

(iii) you are making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trade mark or service mark at issue.

Complainant need only make out a *prima facie* case that Respondent has no rights or legitimate interests in the disputed domain names, after which the onus shifts to Respondent to rebut that case by demonstrating those rights or interests (see *Do The Hustle, LLC v. Tropic Web*, D2000-0624 (WIPO Aug. 21, 2000)).

The publicly available WHOIS information lists Respondent as "Trevor Biscope" providing no *prima facie* evidence that Respondent might be commonly known by the disputed domain names. There is no evidence that Respondent has any trademark rights. There is no evidence that Complainant has authorized Respondent to use the trademark and Complainant denies any such authorization.

There is no evidence that the disputed domain names have been used in connection with a *bona fide* offering of goods or services prior to notice of the dispute. Complainant provides evidence that the domain name resolves to an online gambling website. The parties have already been involved in UDRP proceedings concerned with domain names linked to the same trademark. Respondent is therefore aware of Complainant and its business and has chosen to connect the disputed domain names to a site having no bearing on Complainant's business and likely to tarnish Complainant's business.

Panel finds that Complainant has established *prima facie* cases and so the onus shifts to Respondent to establish a legitimate interest in the domain names. In the absence of a Response, those cases are not rebutted and so Panel finds that Respondent has no rights or interests and so finds that Complainant has satisfied the second limb of the Policy.

Registration and Use in Bad Faith

Complainant must prove on the balance of probabilities both that the disputed domain names were registered in bad faith and used in bad faith.

Further guidance on that requirement is found in paragraph 4(b) of the Policy, which sets out four circumstances, any one of which is taken to be evidence of the registration and use of a domain name in bad faith if established.

The four specified circumstances are:

- '(i) circumstances indicating that the respondent has registered or acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in

excess of the respondent's documented out-of-pocket costs directly related to the domain name; or

(ii) the respondent has registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that Respondent has engaged in a pattern of such conduct; or

(iii) the respondent has registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, respondent has intentionally attempted to attract, for commercial gain, internet users to respondent's website or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the respondent's website or location or of a product or service on the site or location.'

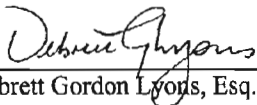
Panel finds that Respondent's actions fall squarely under paragraph 4(b)(ii) above. Respondent has already engaged in the same conduct (see *C-byte Computer Systems LLC v. Trevor Biscope/C-Byte, Inc.*, FA 1523522). Respondent then took advantage of new gTLD extensions to register the disputed domain names in the knowledge that it was quite likely Complainant may desire those names (see *Liberty Mut. Ins. Co. v. Bin g Glu*, FA 1036129 (Nat. Arb. Forum Sept. 2, 2007) holding prior UDRP proceedings sufficient evidence of a pattern of bad faith registrations; *Stevens v. Modern Ltd.-Cayman Web Dev.*, FA 250005 (Nat. Arb. Forum May 17, 2004) ("Registration and use of a domain name to prevent Complainant from reflecting its mark in a corresponding domain name through a pattern of such conduct evidences bad faith registration and use of a domain name pursuant to Policy ¶ 4(b)(ii).").

Panel finds registration and use in bad faith.

DECISION

Having established all three elements required under the ICANN Policy, the Panel concludes that relief shall be **GRANTED**.

Accordingly, it is Ordered that the <c-byte.company>, <c-byte.management>, <c-byte.solutions>, <c-byte.support>, and <c-byte.systems> domain names be **TRANSFERRED** from Respondent to Complainant.



Debrett Gordon Lyons, Esq.
Arbitrator

Debrett G. Lyons, Panelist

Dated: July 11, 2014

[Print](#) | [Close Window](#)

Subject: computer expert
From: "Trevor[TeamC-Byte]" <biscope@c-byte.us.com>
Date: Wed, Apr 15, 2015 12:49 pm
To: admin@cpi-ebiz.com

<http://www.ripoffreport.com/r/wanda-brink-cpi-ebizcom/alamosa-colorado-81101/wanda-brink-cpi-ebizcom-computer-partz-coloradocomputer-parts-in-coloradobrink-lives-1115325>

grade 7 does not make you a computer expert Wanda Brink - you are nothing more than a liar and a thief - you will be prosecuted to the full extent of the law

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NOTATION: This email and the following emails from the Respondent Trevor Biscope are extortion (criminal law, the crime of obtaining something such as money or information from somebody by using force, threats, or other unacceptable methods)

2/ These emails are so bizarre and weird that it would be laughable except it is clear that the Respondent would do us the utmost harm.

3/ Scurrilous (containing abusive language or defamatory allegations) and intentionally in nature.

4/ Filing "ripoffreports" is the lowest form of " get even" because the false information is never removed and there is no justice seeking platform to deal with posted information. (The Better Business Bureau actually seeks to resolve issues and does not allow bullying)

[Print](#) | [Close Window](#)

Subject:

From: "Trevor[TeamC-Byte]" <biscope@c-byte.us.com>

Date: Fri, Jun 06, 2016 9:55 pm

To: admin@cpl-ebiz.com

I'm almost fifty years old and you don't think I know how the game is played.

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[Print](#) | [Close Window](#)

Subject: High School Grad
From: "Trevor[TeamC-Byte]" <biscope@c-byte.us.com>
Date: Tue, Jun 09, 2015 1:29 pm
To: admin@cpi-ebiz.com

Even strippers have to have a high school diploma,

=> <http://www.komonews.com/news/offbeat/Las-Vegas-strip-club-recruits-recent-high-school-graduates-306381771.html>

when you get the job make sure you sign an operator's agreement LOL

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Subject: Re: RIPOFFREPORT: DOUG ZACKER WANDA BRINK BLACK WIDOW MURDER
From: "Trevor[TeamC-Byte]" <biscope@c-byte.us.com>
Date: Sat, Jun 13, 2015 3:55 pm
To: admin@cpi-ebiz.com

I am emailing a copy of this link to the list of directors at the National Western Stock Show:

=> <http://nationalwestern.com/about/>

On Sat, 13 Jun 2015, Trevor[TeamC-Byte] wrote:

>
> DONE
>
> On Sat, 13 Jun 2015, Trevor[TeamC-Byte] wrote:
>
>>
>> Now you can explain to Tom Zacker why your name is front page with his
>> brother in a murder claim - love triangle.
>>
>> Guaranteed - no one will have anything to do with your business.
>>
>> All of this over a \$14 domain that you don't own, to return my domain's,
>> just send the transfer code.
>>
>>
>>
>>
>

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[Print](#) | [Close Window](#)

Subject: Re: RIPOFFREPORT: DOUG ZACKER WANDA BRINK BLACK WIDOW MURDER
From: "Trevor[TeamC-Byte]" <biscope@c-byte.us.com>
Date: Sat, Jun 13, 2015 3:55 pm
To: admin@cpl-ebiz.com

I am emailing a copy of this link to the list of directors at the National Western Stock Show:

=> <http://nationalwestern.com/about/>

On Sat, 13 Jun 2015, Trevor[TeamC-Byte] wrote:

>
> DONE
>
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>> All of this over a \$14 domain that you don't own, to return my domain's,
>> just send the transfer code.
>>
>>
>>
>>
>

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[Print](#) | [Close Window](#)

Subject: DOUG ZACKER WANDA BRINK BLACK WIDOW MURDER
From: "Trevor[TeamC-Byte]" <blscope@c-byte.us.com>
Date: Sat, Jun 13, 2015 12:38 am
To: admin@cpi-ebiz.com

Now you can explain to Tom Zacker why your name is front page with his brother in a murder claim - love triangle.

Guaranteed - no one will have anything to do with your business.

All of this over a \$14 domain that you don't own, to return my domain's, just send the transfer code.

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Print | Close Window

Subject: RIPOFF REPORT | Wanda-Brink-Wanted-For-Murder-Of-Doug-Zacker-Family-Seeks-Justice-EXTREME-CAUTION-Armed-and-Dangerous-Violent
From: "Trevor[TeamC-Byte]" <biscope@c-byte.us.com>
Date: Tue, Jun 23, 2015 1:40 pm
To: admin@cpi-ebiz.com

APPROVED

You've been caught lie'ing so much, how do we know when you're telling the truth or lie'ing? Did your temper get the best of you, and you just simply blacked out in a rage of anger/violence, you've always had an extreme violent nature. Did you pre-meditate, planning out weeks in advance, how you would seek your revenge. Did he make you do it? Like beating your children, he made you do it?

Lie'ing and stealing - are all the same - it always catches up to you. When you tell the truth, you don't need to remember the lies.

Arbitration is considered a means of saving the tax payer money, I'm certain you can provide an arbitrator your evidence in building your case. You should just turn yourself into police, you know what you did is wrong. Abandoning all your children, doesn't wash all this away.

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UDRP EXHIBIT
PAGE / OF / PAGES
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screenshot Vegas IM resolves to gambling site

Sunday, June 28, 2015
2:42 PM



VegasIM
The world's most exciting Vegas

POKER SLOTS TABLE GAMES SPORTSMARK BACKGAMMON MAHJONG

Sign-Up For Vegas
It's Free and Always Will Be.
Receive 100% first deposit bonus, up to \$500!

REGISTER HERE

VIDEO
[Video Player]

SPORTSMARK
F Baseball
F Football

LAST MINUTE NEWS
No last minute bets!

ODDS SYSTEM EU - Local



Exhibit 26
6 page of 9

Maintenance Enforcement

7th Floor North
J.E. Brownlee Building
10365 - 97 Street
Edmonton, Alberta
Canada, T5J 3W7
Website: www.justice.gov.ab.ca/mep

Client Services Centre:
8:00 - 11:00 a.m. & 12:00 - 4:00 p.m.
Telephone: (780) 422-5555
Fax: (780) 401-7575
In Alberta Toll Free: (310-0000) (780) 422-5555
E-mail: alberta.mep@just.gov.ab.ca

March 4, 2013

C-BYTE COMPUTER SYSTEMS LLC
PO BOX 1896
ALAMOSA CO 81101
UNITED STATES

Attention: Payroll / Accounts Department
Re: Support Deduction Notice - Salary / Wages
COURT FILE NO: 4801123021
MEP FILE: 0653-998

TREVOR DANIEL BISCOPE
PO BOX 446 STATION MAIN
CALGARY AB T2P 2J1

BIRTHDATE: August 12, 1970
SIN No: 640-434-510

Enclosed is a Support Deduction Notice that outlines your obligations in this matter. This notice has been issued so that family maintenance payments owed by the person named above ('the debtor') can be deducted from funds you or your organization owes to him/her. The debtor may have asked that we obtain payments in this way, or we may be issuing this notice because the debtor's payments are not up to date.

Please note that this notice is in effect for **12 years**, unless we notify you in writing that it is terminated earlier. By law, you must send us funds within 15 days. As discussed in the attached information sheet, this is most conveniently done through telephone or Internet banking. If you do not send funds, a letter must be sent to us within the 15 days explaining why not. You should also contact us if the debtor's birth date and social insurance number as listed above do not match your records.

You are also encouraged to contact our Client Services Centre at (780) 422-5555 (dial 310-0000 first for toll-free access from anywhere in Alberta) if you have any questions. Staff are available to assist you between 8:00 and 11:00 a.m. and noon to 4:00 p.m. on Mondays, Tuesdays, Thursdays and Fridays and from noon to 4:00 on Wednesdays. Employers may follow the prompts to receive faster service through our dedicated employer line, or access the employer information on our website at www.albertamep.gov.ab.ca.

*FAX- 403-476-4594.
ask Sarah*

Exhibit 26
6 page of 9

C-BYTE COMPUTER SYSTEMS LLC
PO BOX 1896
ALAMOSA, CO 81101-1896

**STATE OF MONTANA
DEPARTMENT OF PUBLIC HEALTH AND HUMAN SERVICES
CHILD SUPPORT ENFORCEMENT DIVISION
PO Box 202943 • Helena MT 59620-2943
(406) 444-0263**

To save certified mail costs to the State of Montana, please complete item 2 (date, city, state), date and sign the bottom of this form, and return it to the CSED in the enclosed self-addressed envelope.

ACKNOWLEDGMENT OF RECEIPT OF ORDER(S) AND WAIVER OF SERVICE

I, the undersigned person, say:

1. I am a representative of C-Byte Computer Systems Llc.

2. That on _____ in _____, I personally
(date) (city, state)

received the document(s) named below for **Trevor D Biscope**, dated July 16, 2014, Case Number **0229824 / 08** .

- ◆ Order to Withhold Income for Child Support or Amended Order to Withhold Income for Child Support
- ◆ Order to Enroll for Medical Support or Amended Order to Enroll for Medical Support

3. That I waive my right to have the above-named document(s) personally served upon me.

Signature _____ Title _____
Date _____ Printed Name _____ Phone _____

For assistance with this order, visit our web site at www.childsupport.mt.gov and select Employer Information.

INCOME WITHHOLDING FOR SUPPORT

C-BYTE.CLUB

CS2748

Original Income Withholding Order
 Amended IWO

Termination of IWO
 One-Time Order for Lump Sum Payment

July 16, 2014

Child Support Enforcement Agency
Note: This IWO must be regular on its face. Under certain circumstances you must reject this IWO and return it to the sender. (See IWO instructions at <http://www.acf.hhs.gov/programs/cse/newhire/employer/publication/publication.htm#forms>) If you receive this document from someone other than a State or Tribal CSE agency or a Court, a copy of the underlying order must be attached.

State: **Montana**
Co/City/Dist: **Child Support Enforcement Division (CSED)**
Case Number(s): **0229824 / 08**

C-Byte Computer Systems Llc
PO Box 1896
Alamosa, CO 81101-1896

Obligor/Employee:
Trevor D Biscope
SSN: **640-43-4510**
Remittance ID/Par ID: **P0001006951**

Children's Names Date of Birth
Christopher D Biscope March 2, 1992
Matthew D Biscope March 2, 1992

Custodian:
Lisa M Biscope

ORDER INFORMATION: This Order is based on an order for support from . You are required by law to deduct the following amounts from Trevor D Biscope's income until further notice.

\$ 0.00 per month in current support Arrears 12 weeks or greater?
\$ 2,014.78 per month in past-due support N/A for Montana CSED

\$ 2,014.78 TOTAL AMOUNT to withhold per month

AMOUNTS TO WITHHOLD: You do not have to vary your pay cycle to be in compliance with the Order Information above. If your pay cycle does not match the ordered support payment cycle, withhold one of the following amounts:

\$ 464.94 per weekly pay period \$ 1,007.39 per semimonthly pay period (twice a month)
\$ 929.89 per biweekly pay period (every two weeks) \$ 2,014.78 per monthly pay period.

REMITTANCE INFORMATION: If the obligor's principal place of employment is Montana, you must begin withholding on the first pay period which occurs after you receive this order. Send payment within seven (7) days of the pay date. You are entitled to deduct a fee of \$5 per month to defray the cost of withholding. If you cannot withhold the full amount of support for any or all orders for the obligor, withhold up to 50% of his/her disposable income for all orders. If the obligor's principal place of employment is not Montana, obtain withholding limitations, applicable time requirements, and any allowable employer fees for the obligor's principal place of employment at http://www.acf.hhs.gov/programs/cse/newhire/employer/contacts/contact_map.htm.

Employers may remit child support payments electronically at <http://app.mt.gov/csp>. To remit by EFT, call (406) 444-2775 for the required format. To contact a caseworker, see name and number at bottom of next page.

Make check payable to: **Montana CSED**
Par ID P0001006951
SSN 640-43-4510

Remit payment to: **Montana CSED SDU**
Wage Withholding Unit
PO Box 8001
Helena MT 59604-8001

July 16, 2014
Authorized by: Chad R. Dexter, Administrator

Designee: 

Return to sender (to be completed by employer). Payments must be directed to an SDU. If they are not or if this IWO is not regular on its face, you must check this box and return the IWO to sender. Note: All IWOs from the Montana CSED direct payment to the SDU.

If the obligor does not work in Montana, you must provide him/her with a copy of this IWO.

STATE OF MONTANA
DEPARTMENT OF PUBLIC HEALTH AND HUMAN SERVICES
CHILD SUPPORT ENFORCEMENT DIVISION
(406) 444-0263

INCOME WITHHOLDING IN BRIEF

The enclosed income withholding order is in the federally required format. Please call the Montana Child Support Enforcement Division (CSED) at the above number if you have questions. Be sure to refer to the case number(s) noted on the order.

Net income: "Net income" is the part of a person's income remaining after deductions for federal and state income taxes, employment taxes, social security deductions (FICA), mandatory retirement, federal income tax liens, and mandatory union dues.

Multiple orders for one employee: You may receive more than one order to withhold for the same person's income. If this happens, you must withhold the total amount of all orders. CSED policy provides that total withholding for all orders cannot be more than 50% of the person's net wages or earnings.

Income withholding when income is not wages, earnings or remuneration for personal services: If the income you pay to the person is not wages, earnings, or remuneration for personal services, total withholding can be up to 100% of net income. For example, income such as rental monies or contract proceeds not for personal services is subject to withholding up to 100% of net income.

Duration of order: You must continue to withhold as long as the person receives income from you or until the CSED notifies you that the order is modified or terminated by sending you an Amended Order or a Termination of Order. Subsequent orders will reference the PAR ID and case numbers. If you receive an amended order, you must withhold the amount(s) in the amended order, and any other amounts ordered for this individual.

Retain this order in your records so that if you resume payments to this individual in the future, you can begin income withholding at once.

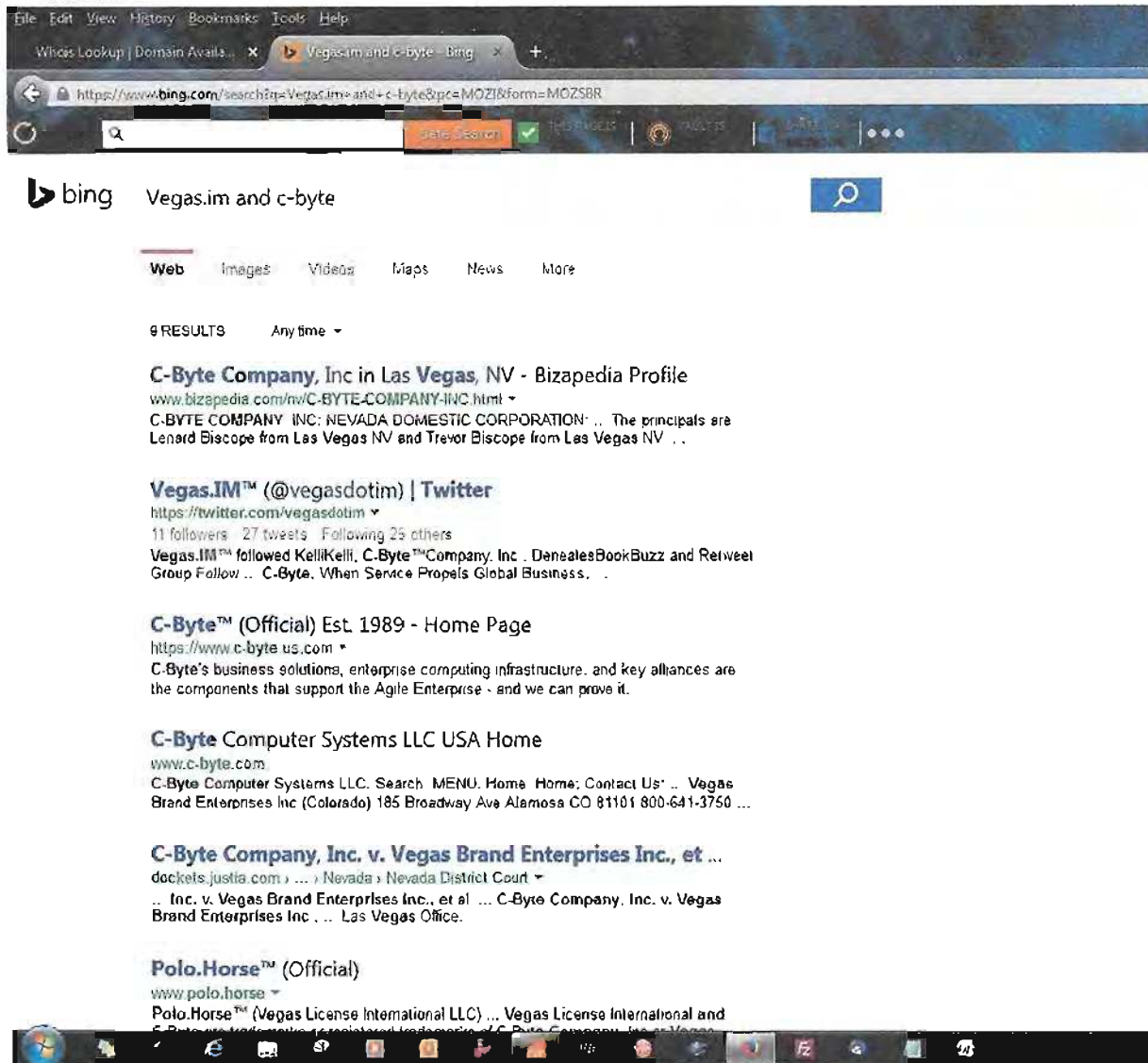
Other claims against income: You may receive writs of execution, garnishments, wage assignments, voluntary income deductions, or claims by creditors against the same person's income. If this happens, you must **first** withhold the amount(s) in any CSED orders.

More reading: Be sure to read the attached "Additional Information to Employers/Withholders" for clarification of income withholding requirements and important information about your liability under the law.

Legal basis: MCA Title 40, Chapter 5, Part 4 and the rules of the CSED, as published in the Administrative Rules of Montana.

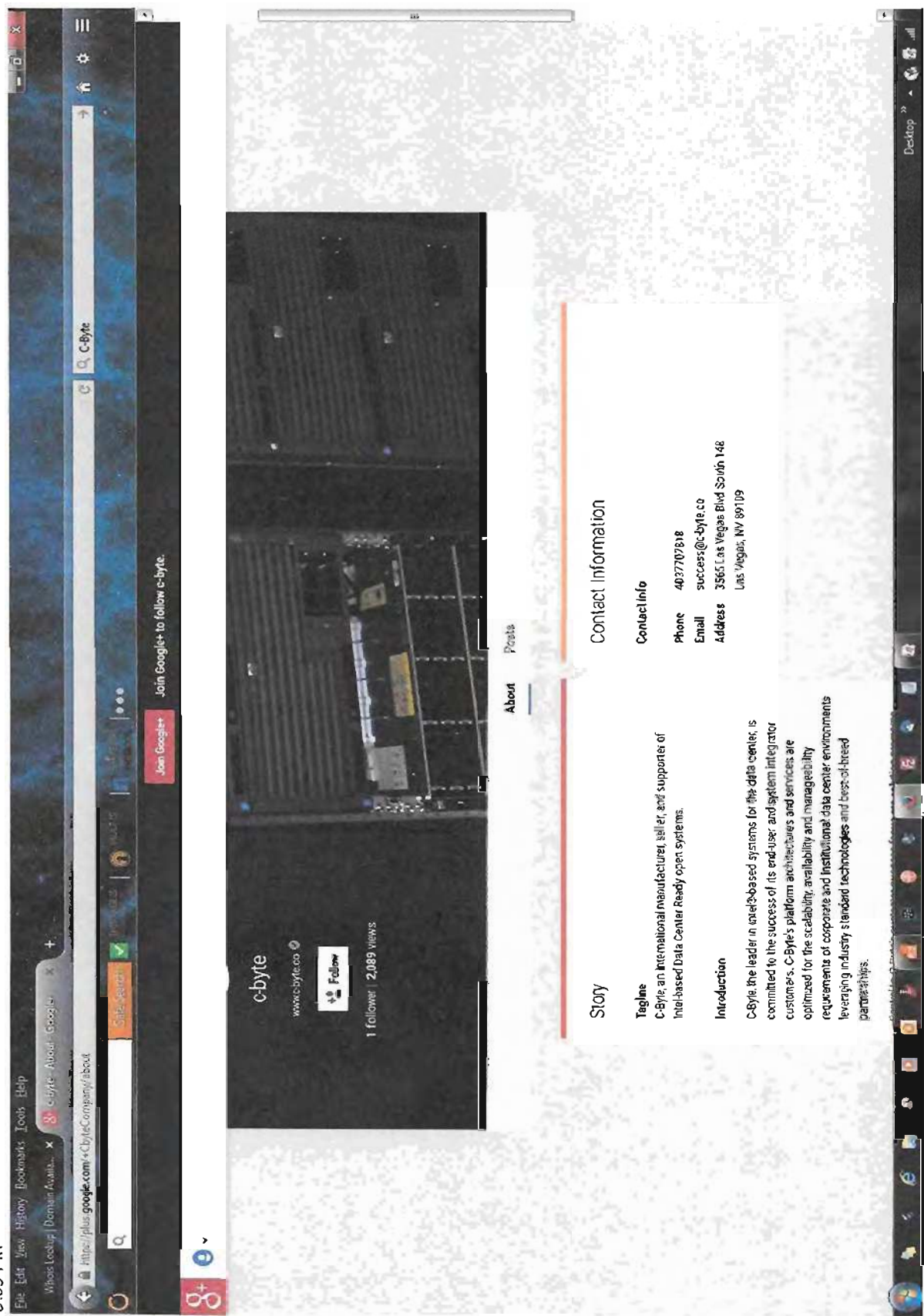
Bing Search c-byte | vegas.im

Friday, May 22, 2015
5:59 PM



impersonation of C-byte .co Google search

Friday, May 22, 2015
6:09 PM





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Las Vegas, Nevada, United States of America

Check-in Date Check-out Date Rooms Adults (Age 18+) Children (0-17)



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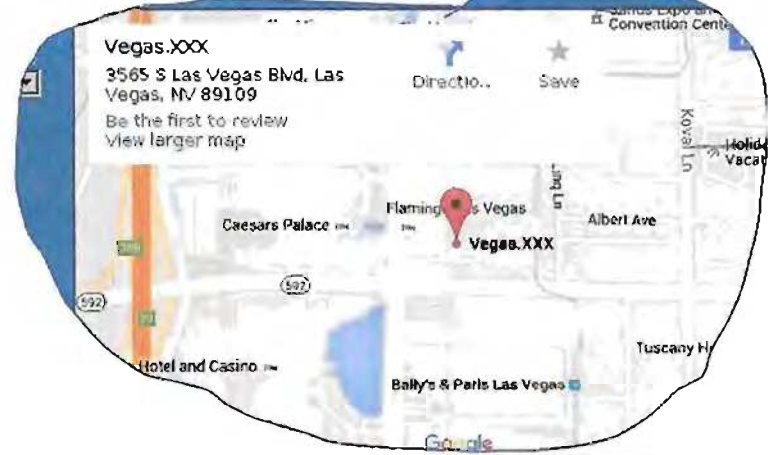
UDRP EXHIBIT L PAGE 3 OF 9 PAGES

UDRP EXHIBIT L PAGE 3 OF 9 PAGES C-BYTE CLUB



Vegas.ADULT is applied for by Respondent with USPTO and website is not registered with Respondent Trevor Biscope

PAGE **4** OF **9** PAGES
C-BYTE.CLUB



vegas.xxx has R in a circle [®] this symbol is reserved for trademarks that are actually registered according to USPTO
This mark is already registered and not with the Respondent



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65,400 RESULTS Any time Safe Search Moderate

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xhamster.com/movies/533718/las_vegas_XXX.html
Video preview: Watch Las Vegas XXX at xhamster.com! What happens in Vegas is rather strict. LOL

Videos of vegas.xxx



Related searches

- Anime XXX
- Show White XXX
- Vegas Sex Party
- Vegas Hotel Sex
- Natalia Ebony XXX
- Drunk Girls Sex in Vegas
- Veronique Vega
- BRW Vegas XXX

Store front is UPS Store in Las Vegas

Sunday, June 28, 2015
3:00 PM

The screenshot shows a web browser window with the following details:

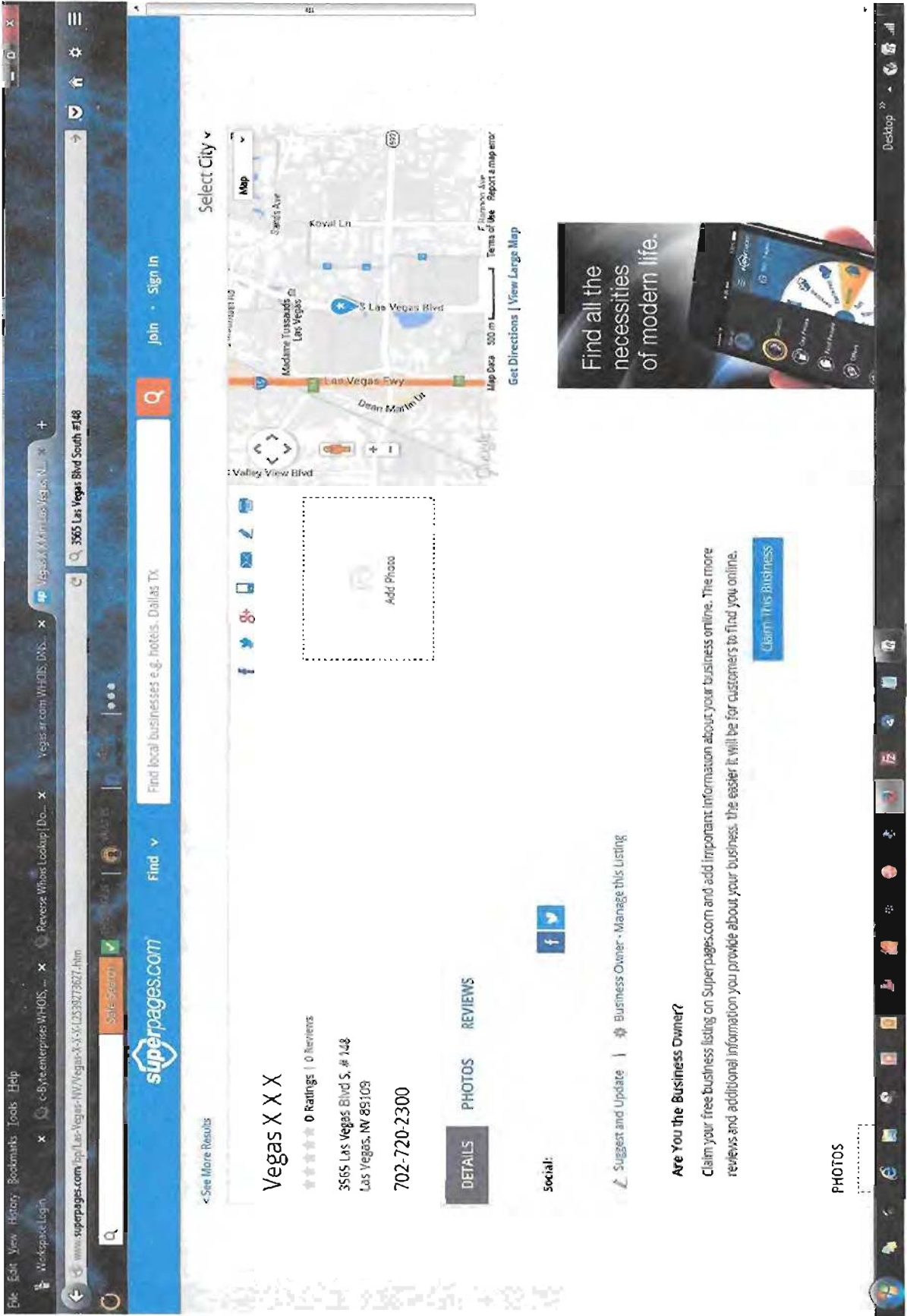
- Browser Address Bar:** http://lasvegas-nv-5300.theupstorelocal.com
- Page Title:** The UPS Store
- Map:** A Google Map showing the store location at 3565 Las Vegas Blvd South #148, Las Vegas, NV 89109. The map includes labels for Koval Ln, Las Vegas, and the 595 highway.
- Contact Information:**
 - The UPS Store:** 3565 Las Vegas Blvd S, Las Vegas, NV 89109
 - Get Directions to get there:** (702) 467-2772
 - Phone:** (702) 307-6162
 - Website:** store5300.theupstore.com
 - Online Printing:** Online Printing
- Hours of Operation:**
 - Monday - Friday:** 9:00 am - 7:00 pm
 - Saturday - Sunday:** 9:00 am - 5:00 pm
- UPS Store Hours:**
 - Monday - Friday:** 9:00 am - 7:30 pm
 - Saturday:** 9:00 am - 5:00 pm
 - UPS Store Pickup Hours:** Monday - Friday
- Shipping and Printing Services Las Vegas:**
 - WE CAN HELP:** Solutions for Small Businesses
 - Text:** Small business custom labels don't have a much in the way of resources. That's why we have labels that help small business solutions from your friends at The UPS Store #5300 in Las Vegas, NV.
 - Text:** Not only are we your one-stop shop for The UPS Store products and services, but through our relationships with valued service providers, you'll get exclusive deals on the types of business services you need most.
 - Text:** Found a problem? You bet. Finding and solving it's our problem. We know. We've solved it before for you. When it comes to the logistics of running your business, get it small, near or far, we'll get you there.

UDRP EXHIBIT
PAGE 7 OF 9 PAGES
C-BYTE.CLUB

Vegas.XXX same address as UPS

Sunday, June 28, 2015
2:50 PM

UDRP EXHIBIT
PAGE OF PAGES
C-BYTE.CLUB

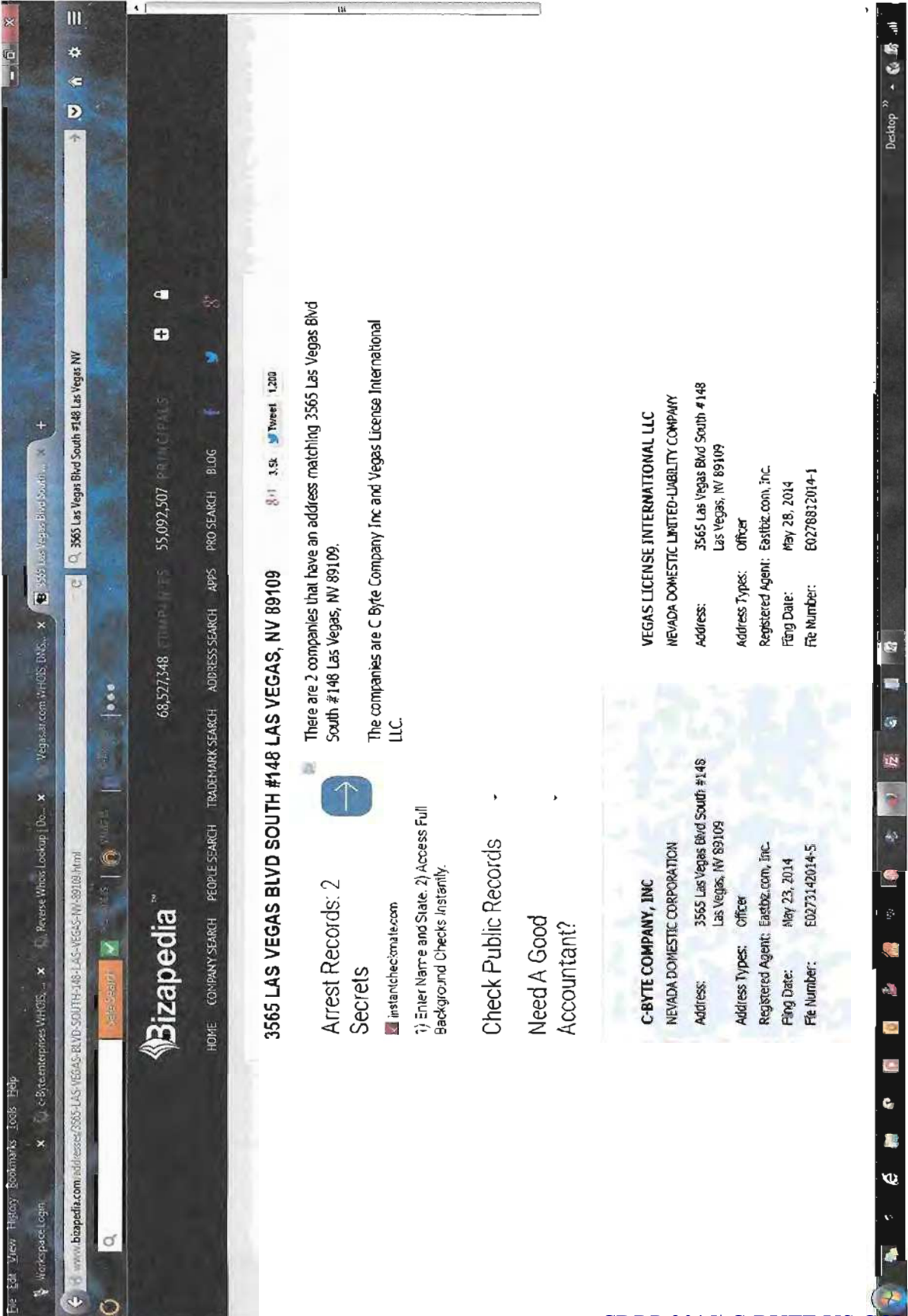


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UDRP EXHIBIT
PAGE 9 OF 9 PAGES
C-BYTE.CLUB

same address as UPS

Sunday, June 28, 2015
2:54 PM



UDRP EXHIBIT **K**
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C-BYTE.CLUB

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

C-BYTE COMPANY, INC., et al.,
Plaintiff(s),
v.
VEGAS BRAND ENTERPRISES INC., et al.,
Defendant(s).

Case No. 2:14-CV-1231 JCM (VCF)

ORDER

Presently before the court is *pro se* plaintiffs C-Byte Company, Inc. and Trevor Biscope’s motion to enforce stay. (Doc. # 1). Defendants did not file a response and the deadline to do so has passed.

Also before the court is defendants Vegas Brand Enterprises, Inc., C-Byte Computer Systems, LLC, Wanda Brink, Ron Brink, National Arbitration Forum, Houston Putnam Lowry, and Debrett G. Lyons’ motion to dismiss plaintiffs’ “motion to enforce stay.” (Doc. # 8). Plaintiffs filed a response (doc. # 12) and defendants filed a reply (doc. # 8).

This matter involves a dispute between the parties as to the ownership of several internet domain names. (Doc. # 8). Appointed arbitrators have held twice that the domain names at issue belong to defendants and have ordered those domain names be transferred back to defendants. (Doc. # 8-1). Plaintiffs disagree with the arbitration decisions and appear to attempt to initiate an action in this court to overrule the prior arbitration decisions.

Plaintiffs have not filed a complaint in this action. Instead of filing a complaint, plaintiffs filed a motion to enforce stay. (Doc. # 1). The court is unable to grant plaintiffs’ motion to enforce stay, as plaintiff has failed to file a complaint initiating an action against defendants. *See* Fed. R. Civ. P. 3 (“A civil action is commenced by filing a complaint with the court.”). Even if the court

James C. Mahan
U.S. District Judge

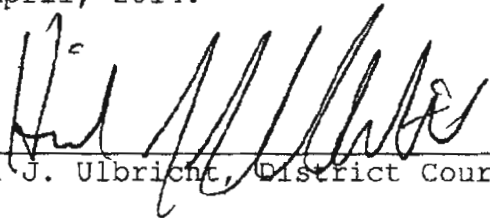
C-BYTE.CLUB

Defendants filed their Motion to Dismiss and their Brief in Support of Motion to Dismiss on Monday, March 24, 2014. The Certificate of Service shows that a copy was served upon Plaintiff at the address he provided this Court and upon the Canadian law firm which mailed Plaintiff's Complaint for Injunctive and Declaratory Relief to this Court. Thus, under Rule 2(a), M.U.Dist.Ct.R., Plaintiff's response was due on or before Thursday, April 10, 2014. Plaintiff failed to respond. Thus, under Rule 2(b), M.U.Dist.Ct.R., Defendants' Motion to Dismiss is deemed well taken. Accordingly, the Court enters the following:

ORDER OF DISMISSAL

IT IS HEREBY ORDERED that this case is dismissed.

DATED this 10th day of April, 2014.


 Heidi J. Ulbricht, District Court Judge

cc: David Sandler
 Trevor Biscope
 Leffler Law Office

4/12/14 