

Before the:

**WORLD INTELLECTUAL PROPERTY ORGANIZATION
ARBITRATION AND MEDIATION CENTER**

DONALD J. TRUMP,

Complainant,

v.

SCOTT STEPHENS,

Respondent.

Disputed Domain:

TRUMPESTATES.COM

Case No. D 2015-0478

**COMPLAINANT'S SUPPLEMENTAL FILING
FURTHER DEMONSTRATING RESPONDENT'S
BAD-FAITH INTENT TO PROFIT FROM THE DOMAIN¹**

Complainant Donald J. Trump, by and through his undersigned counsel, hereby submits the following posts from respondent Scott Stephen's Facebook account further demonstrating Respondent's bad-faith intent to profit from the Domain:

1. Post dated February 25, 2015 (**Exhibit U-1** hereto) detailing Respondent's receipt of a cease and desist letter from Complainant as well as his subsequent call to the *New York Post* regarding the story;
2. Three posts dated March 2, 2015 (**Exhibit U-2** hereto) sharing a link to a March 1, 2015 *New York Post* article entitled "*Donald Trump Fighting for Domain Name of Future Development*";
3. Post dated March 3, 2015 (**Exhibit U-3** hereto) requesting that his friends share the March 1, 2015 *New York Post* article;
4. Post dated March 3, 2015 (**Exhibit U-4** hereto) sharing a link to a March 1, 2015 article entitled "*Trump Lawyers Going After Owner of Trumpestates.com*";

¹ All defined terms shall have the same meaning as in the Complaint dated March 18, 2015.

5. Post dated March 3, 2015 (**Exhibit U-5** hereto) commenting on how multiple news agencies have picked up the March 1, 2015 *New York Post* article;

6. Post dated March 3, 2015 (**Exhibit U-6** hereto) again sharing the March 1, 2015 *New York Post* article and detailing Respondent's prior offers to sell the Domain to Complainant;

7. Post dated March 5, 2015 (**Exhibit U-7** hereto) again sharing the March 1, 2015 *New York Post* article and commenting that Respondent "Trumped the Donald";

8. Post dated March 8, 2015 (**Exhibit U-8** hereto) commenting on the upcoming presidential election and Complainant;

9. Post dated March 9, 2015 (**Exhibit U-9** hereto) again sharing the March 1, 2015 *New York Post* article, tagging Complainant's Facebook page and stating again that Respondent "Trumped the Donald";

10. Post dated March 10, 2015 (**Exhibit U-10** hereto) sharing links to multiple news outlets that reprinted the March 1, 2015 *New York Post* article;

11. Three posts dated March 13, 2015 (**Exhibit U-11** hereto) sharing multiple links to articles regarding the Domain dispute and rhetorically asking "How many articles am I in over trumping the Donald?";


12. Post dated March 16, 2015 (**Exhibit U-12** hereto) sharing a link to Respondent's *eBay* account listing the Domain for sale and requesting followers to make the Domain "popular" by going to eBay and clicking the "Watch this Item Button";

13. Post dated April 10, 2015 (**Exhibit U-13** hereto) requesting that his friends loan him money so that he can renew several domains (including *trumpestates.com*) that he owns and is trying to sell and stating that he has "several interested buyers", one of which is Complainant;

14. Post dated April 16, 2015 (**Exhibit U-14** hereto) again sharing the March 1, 2015 *New York Post* article.

Dated: New York, New York
April 21, 2015

Respectfully submitted,



Alan Garten, Esq.
c/o The Trump Organization
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New York, New York 10022
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E-Mail: agarten@trumporg.com

Attorney for Complainant Donald J. Trump

EXHIBIT U-1

POST DATED FEBRUARY 25, 2015



Scott Allen Meek Stephens

February 25 · Edited · 🌐

So, after yrs of owning www.TrumpEstates.com I got a Cease and Decist Demand from The Trump Orgaization. I called their laryers today and explained I spoke with Michael Cohen about 5 yrs ago and that I would give up the domain name for a handshake from Donald Trump and a dollar. Mr. Cohen said just give us the domain name and we won't sue you! At which point I said get back to me and I will think about it. Well it has been five plus yrs since this incident happened while I was sitting in the owners office of Manhattan Motor Cars.

So after my explaining to this new lawyer today five yrs later, i said i would like to get some sort of compensation out of it after registering it for the past several yrs and not selling it to a foreign corporation. he said, we will give you \$30.00 for it.. I then interrupted and said, you know I got these domain names to raise funds for my non profit the council for native american indian progress inc. At which point he raised his offer to \$300.00 and an autograph signed book from Trump and I could through in another domain name I own www.420Frosty.com at which point I said let me get back to you later.

I immediately called a couple attorney friends and one of them has a friend at the New York Post, well they called about 20 minutes later and they thought it was a good enough story to run by the editor and that they're very interested in my story.

Also big news, from the conversation I had with this attorney Alan Garten who works for the Trump Organization, it looks like Donald Trump is going to run for president!!!

Maybe you heard it first from me.

Share this story. . Thanks

[Like](#) · [Share](#)

👍 5 people like this.



Scott Allen Meek Stephens Right...lol Arse...

February 28 at 4:20pm · Like

EXHIBIT U-2

POSTS DATED MARCH 2, 2015



Scott Allen Meek Stephens

March 2 · 🌐

Monday came and is now gone but I had an eventful day... made the front page of the New York Post on sunday...lots of calls today and correspondences and it all looks quite nice so far..

<http://nypost.com/.../donald-trump-fighting-for-domain-name-.../>

How was your day!

Like · Share

👍 2 people like this.



Scott Allen Meek Stephens

March 2 · 🌐

So I made the front page of the New York Post on sunday.

<http://nypost.com/.../donald-trump-fighting-for-domain-name-.../>

Please share

Like · Share

👍 3 people like this.



Scott Allen Meek Stephens

March 2 · 🌐

Haha

<http://nypost.com/.../donald-trump-fighting-for-domain-name-.../>

Like · Share

👍 Wayne Mccall likes this.

EXHIBIT U-3

POST DATED MARCH 3, 2015



Scott Allen Meek Stephens via **New York Post**

March 3 · 🌐

SHARE



Donald Trump fighting for domain name of future development

The real-estate titan developing a luxury housing complex called Trump Estates in Dubai but doesn't own the TrumpEstates domain name.

[NYP.ST](#)

Like · Share

EXHIBIT U-4

POST DATED MARCH 3, 2015



Scott Allen Meek Stephens

March 3 · 🌐

Hey Mom, look at me now!



Trump Lawyers Going After Owner of TrumpEstates.com

If it has the name Trump in it, The Donald believes it is rightfully his. The real-estate titan is poised to develop a luxury housing complex in Dubai called Trump Estates, but doesn't own the TrumpEstates domain name. A Trump Organization lawyer...

ALAN.COM

Like · Share

👍 2 people like this.



Joshua Radwan Hhahahaha

March 3 at 4:50pm · Like



Joshua Radwan Stephens!!

March 3 at 4:51pm · Edited · Like



Joshua Radwan Thats you!!

March 3 at 4:51pm · Like



Scott Allen Meek Stephens I offered it to hm for a dollar and a handshake 5 yrs ago while at Manhattan Motor Cars. Brian miller was a witness..

March 3 at 6:53pm · Like · 👍 1

EXHIBIT U-5

POST DATED MARCH 3, 2015



Scott Allen Meek Stephens

March 3 · 🌐

Dozens of news agencies are running this article.



Real Estate News NYC via Tigho | Donald Trump fighting for domain name of future development -...

Donald Trump fighting for domain name of future development Real Estate News NYC via Tigho NYC...

REALESTATENEWSNYC.COM

Like · Share

👍 3 people like this.



Joshua Radwan Hahaha

March 4 at 3:48am · Like · 👍 1

EXHIBIT U-6

POST DATED MARCH 3, 2015



Scott Allen Meek Stephens

March 3 · 🌐

<http://nypost.com/.../donald-trump-fighting-for-domain-name-.../>

I bought www.TrumpEstates.com yrs ago with the idea I could meet the Donald and sell it to him for a dollar and a handshake. I even made that offer to one of his executive attorneys five yrs ago while I was in Manhattan Motor Cars with the owner Brian Miller as a witness.

Now his attorney offered me 30 bux and an autograph signed book of trump and a cease and desist demand. When I told him I bought it to meet the trump and I bought all my other domains to raise funds for my non profit he then raised his offer from \$30.00 to \$300.00 and I could through in another domain name I own www.420Frosty.com ...

Well if my domain name is infringing on his trademark name TRUMP, then why is FuckTrump.com a site he doesn't go after or TrumpIsland.com or the many other trump related domain names being used by people all over the usa and the world.???

Maybe because he wants his already named business in Dubai The Trump Estates of Dubai to be a success!!!

Well I have seen over a dozen articles in 9 newspapers in 2 days over this... You gotta love the title...

The Donald has been Trumped. ..Lmfao

Like · Share

👍 Buddy Grecco likes this.

EXHIBIT U-7

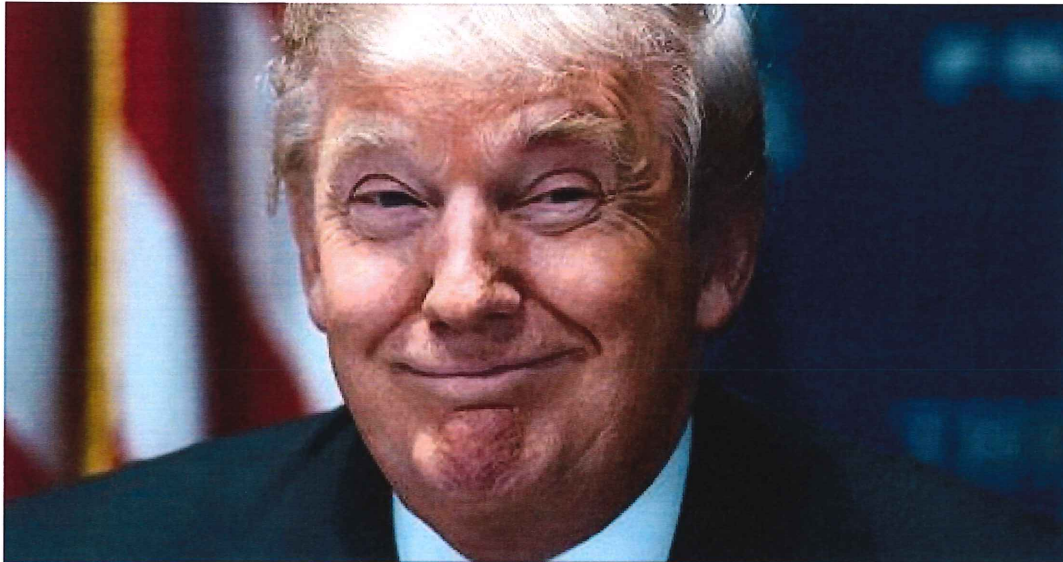
POST DATED MARCH 5, 2015



Scott Allen Meek Stephens via **New York Post**

March 5 · 🌐

I Trumped the Donald. ...lol hahaha



Donald Trump fighting for domain name of future development

The real-estate titan developing a luxury housing complex called Trump Estates in Dubai but doesn't own the TrumpEstates domain name.

NYP.ST

Like · Share

👍 4 people like this.

↪️ 1 share

EXHIBIT U-8

POST DATED MARCH 8, 2015



Scott Allen Meek Stephens

March 8 · 🌐

Who wants to be my vice Presidential candidate?
I can't rely on Donald Trump considering he can't even find an apprentice.
Sarah Palin seems legit but I think she drinks.
Oh and hell no to Hillary, god I had the horrible misfortune to see her in a bikini. So do any of my Facebook friends want to help me run this great country? Please share this post and help me find a true runningmate.

Like · Share

👍 9 people like this.



Mutha Bob I'll take CIA Director... 😏

March 8 at 12:29pm · Like · 👍 1



Tommy Liberto



March 8 at 12:59pm · Like · 👍 1



Scott Reese Help ya anyway I could or can

March 8 at 3:39pm · Like · 👍 1



Buddy Grecco I put the Vice in Vice President... 😊

March 8 at 8:42pm · Like · 👍 3



George Radel Nice.....Thanks.

March 9 at 4:11am · Like · 👍 1



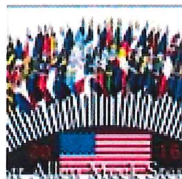
Scott Allen Meek Stephens Hey **George Radel** I sense a bit of sarcasm. We never talk about political stuff except that one night and then a brief couple conversations on the phone but nothing serious. ... Are tou placing your bid to be my running mate?

Awsome let's go public !!!

March 10 at 5:30am · Like



Scott Allen Meek Stephens www.RuVisual.com



2016 presidential candidate president of the
united states of america submit candidacy

I Scott Allen Meek Stephens submit my candidacy for...

[RUVISUAL.COM](http://www.RUVISUAL.COM) | BY [HTTP://WWW.RUVISUAL.COM](http://www.RUVISUAL.COM)

March 10 at 5:30am · Like

EXHIBIT U-9

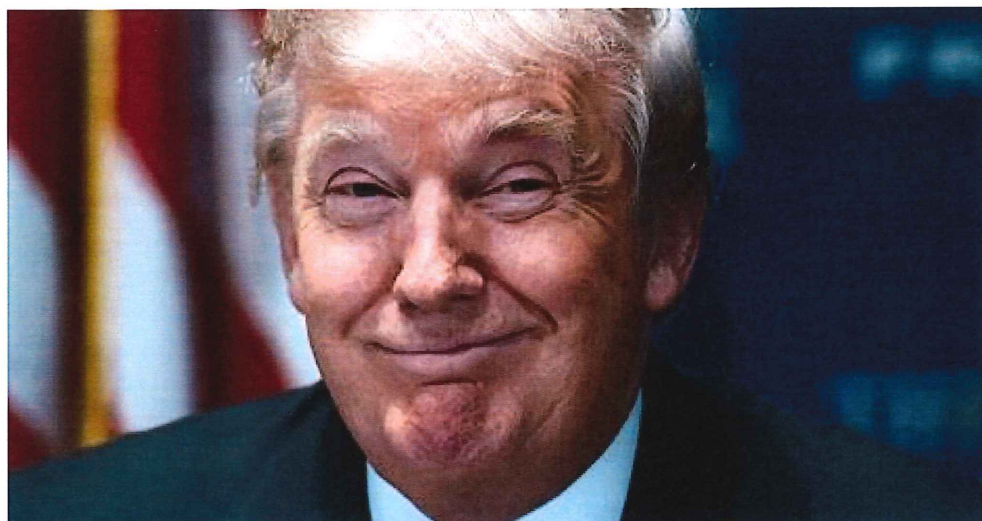
POST DATED MARCH 9, 2015



Scott Allen Meek Stephens

March 9 · 🌐

I Trumped the [Donald J. Trump](#) lol



Donald Trump fighting for domain name of future development

NYP.ST

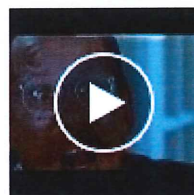
Like · Share

👍 3 people like this.



Buddy Grecco I'd buy THAT for a Dollar,
and a handshake...

<https://www.youtube.com/watch?v=85cL1HsrNc>



Robocop - I'd Buy That For a Dollar

A classic line. That's all I can say.

YOUTUBE.COM

March 10 at 1:17am · Like · 👍 1



Mutha Bob Simply. Awesome. 😎

March 10 at 7:53am · Like · 👍 1

EXHIBIT U-10

POST DATED MARCH 10, 2015



Scott Allen Meek Stephens

March 10 · 🌐

7 online news articles this week about how I trumped the Donald J. Trump

<http://newscentral.exsees.com/.../d3572e83a3d225d804e0f907127...>

<http://nypost.com/.../donald-trump-fighting-for-domain-name-.../>

<http://www.alan.com/.../trump-lawyers-going-after-owner-of-t.../>

<http://www.asiaeu.com/.../donald-trump-fighting-for-domain-na...>

<https://www.namehero.com/.../donald-trump-fighting-for-domai.../>

<http://myinforms.com/.../11260448-donald-trump-fighting-for-.../>

https://www.google.com/finance/company_news...



Trump Lawyers Going After Owner of TrumpEstates.com

If it has the name Trump in it, The Donald believes it is rightfully his. The real-estate titan is poised to develop a luxury housing complex in Dubai called Trump Estates, but doesn't own the TrumpEstates domain name. A...

NEWSCENTRAL.EXSEES.COM

Like · Share

👍 6 people like this.



Paul Starling Tapley Good work Scott!!

March 10 at 11:22pm · Like



Joshua Radwan Thats so awesome! Give him a nice run!

March 11 at 6:05am · Edited · Like · 👍 1

EXHIBIT U-11

POST DATED MARCH 12, 2015



Scott Allen Meek Stephens

March 13 · 🌐

how any articles am I in over trumping the Donald?

https://www.google.com/finance/company_news...

The Trump Organization: market news - Google Finance

Find financial news for The Trump Organization () using Google Finance.

GOOGLE.COM

Like · Share



Scott Allen Meek Stephens

March 13 · 🌐

I Trumped the Donaldlol

<http://newscentral.exsees.com/.../d3572e83a3d225d804e0f907127...>



Trump Lawyers Going After Owner of TrumpEstates.com

If it has the name Trump in it, The Donald believes it is rightfully his. The real-estate titan is poised to develop a luxury housing complex in Dubai called Trump Estates, but doesn't own the TrumpEstates domain name. A...

NEWSCENTRAL.EXSEES.COM

Like · Share



Scott Allen Meek Stephens

March 13 · 🌐

<http://www.ad-hoc-news.de/the-donald-s-been-trum.../.../42238984>

Like · Share

EXHIBIT U-12

POST DATED MARCH 16, 2015



Scott Allen Meek Stephens

March 16 · 🌐

Please help me make this a popular domain name by going to this ebay link and clicking the Watch this Item Button. Donald J. Trump and his band of attorneys want me to give it to them plus another domain name 420Frosty.com for \$300.00 and an autographed book of Trump. Should I take their offer?

<http://www.ebay.com/itm/131457995281...>



Premium domain name TRUMP ESTATES.COM unique 12 character letter business site

Domain transfer includes 100% Ownership of the Domain Name, This domain name holds a very strong r.o.i. A global popular domain name with easy spelling and...

EBAY.COM

Like · Share

👍 3 people like this.



Mutha Bob Do NOT take the offer!!!

March 16 at 12:27pm · Like · 👍 1



James Neveil HOLD OUT FOR MORE!!

March 16 at 1:01pm · Like · 👍 2



Buddy Grecco What?

Not even a handshake from the hairpiece? 😞

March 16 at 1:35pm · Like · 👍 3

EXHIBIT U-13

POST DATED APRIL 10, 2015



Scott Allen Meek Stephens

April 10 at 4:10pm · 🌐

I need some help asap... I need a couple hundred dollars today or I am going to lose a buttload of domain names. In return for the loan I will sign an agreement to pay you back with interest. \$25.00 for each hundred.

I am only seeking a total of \$750.00 and not all from one person... I have always paid back my friends, this time I am offering interest and compounded if not paid back within 30 days... I am desperately trying to save my online business [ScottNot.com](#) and don't want to lose anymore domains to godaddy. Right now I have several interested buyers for domain names but they are trying to lowball me. I do have one person very interested in [HempDoctors.com](#) and [HempMerchandise.com](#) but he is offering \$4200.00 for either one.

Then I have Donald Trump interested in [TrumpEstates.com](#) but he offered me \$300.00 and an autograph signed book for it and [420Frosty.com](#) ... Please someone help me!

Like · Share

👍 2 people like this.

➦ 1 share



Shelli Lipton Take the \$4200.

April 11 at 3:02pm · Like

EXHIBIT U-14

POST DATED APRIL 16, 2015



Scott Allen Meek Stephens

April 16 at 1:01pm · 🌐

I am homeless and need financial help so I don't lose my business investments. Anything anyone can spare will be paid back with interest.. I can take paypal at info@BadBoyTrendz.com



Donald Trump fighting for domain name of future development

The Donald's been trumped. The real-estate titan is poised to develop a luxury housing complex in Dubai called Trump Estates, but doesn't own the TrumpEstates...

[NYPOST.COM](https://www.nypost.com)

Like · Share

👍 2 people like this.