

**THREE ANGELS BROADCASTING  
NETWORK, INC.**

P.O. Box 220  
West Frankfort, IL 62896

**(Complainant),**

vs.

**PRIVACY GROUP/DOMAIN PRIVACY  
GROUP**

70 Blanchard Road  
Burlington, MA 01803

**(Respondent).**

**COMPLAINT**

**Domain Name In Dispute:**

*SAVE-3ABN.COM*  
*SAVE-3ABN.INFO*  
*3ABNVJOY.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 (ICANN Policy), and the Rules for Uniform Domain Name Dispute Resolution Policy (ICANN Rules), adopted by ICANN on August 26, 1999, approved by ICANN on October 24, 1999, updated on March 1, 2010, and the National Arbitration Forum (NAF) Supplemental Rules (Supp. Rules). ICANN Rule 3(b)(i).

**2. COMPLAINANT INFORMATION**

- a. Name: Three Angels Broadcasting Network, Inc.
- b. Address: P.O. Box 220  
West Frankfort, IL 62896
- c. Telephone: (618) 627-4651
- d. Fax: N/A
- e. E-Mail: [mollie.steenson@3abn.org](mailto:mollie.steenson@3abn.org)

**COMPLAINANT'S AUTHORIZED REPRESENTATIVE**

- f. Name: Steven L. Rinehart, Esq.
- g. Address: 50 W. Broadway, Suite 1200  
Salt Lake City, UT 84101
- h. Telephone: (801) 347-5173

- i. Fax: (801) 665-1292
- j. E-Mail: [steve@uspatentlaw.us](mailto:steve@uspatentlaw.us)

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

**Electronic-Only Material**

- a. Method: E-mail
- b. Address: [steve@uspatentlaw.us](mailto:steve@uspatentlaw.us)
- c. Contact: Steven L. Rinehart

**Material Including Hard Copy**

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

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

3. **RESPONDENT INFORMATION**

- a. Name: Privacy Group/Domain Privacy Group
- b. Address: 70 Blanchard Road  
Burlington, MA 01803
- c. Telephone: (602) 716-5339
- d. Fax: N/A
- e. E-Mail: [save-3abn.com@domainprivacygroup.com](mailto:save-3abn.com@domainprivacygroup.com); [save-3abn.info@domainprivacygroup.com](mailto:save-3abn.info@domainprivacygroup.com); [3abnvjoy.com@domainprivacygroup.com](mailto:3abnvjoy.com@domainprivacygroup.com)

4. **DISPUTED DOMAIN NAMES**

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

*SAVE-3ABN.COM*  
*SAVE-3ABN.INFO*  
*3ABNVJOY.COM*

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

- 1. Registrar's Name: Domain.com, LLC
- 2. Registrar's Address: 8100 NE Parkway Dr., Suite 300  
Vancouver, WA 98662
- 3. Telephone Number: (800) 403-3568
- 4. Facsimile: (360) 253-4234
- 5. E-Mail Address: [legal@dotster.com](mailto:legal@dotster.com)

- c. Trademark/Service Mark Information: ICANN Rule 3(b)(viii).  
The Complaint claims under the following registered US trademarks:

<u>Mark</u>	<u>Reg. No.</u>	<u>Reg. Date.</u>	<u>First Use</u>
3ABN	2895078	October 24, 2004	January 1, 1985
3ABN PROCLAIM! NETWORK	4009541	August 9, 2011	November 12, 2009
3ABN URBAN REPORT	3993087	July 12, 2011	October 28, 2010
3ABN DARE TO DREAM	3985365	June 28, 2011	October 28, 2010
3ABN TEN COMMANDMENTS WEEKEND	3978237	June 14, 2011	May 6, 2006
3ABN DARE TO DREAM NETWORK	3952744	April 26, 2011	December 1, 2010
3ABN LATINO	3626951	May 26, 2009	August 24, 2003
3ABN RADIO NETWORK	3626950	May 26, 2009	February 28, 2000
THREE ANGELS BROADCASTING NETWORK	3978087	June 14, 2011	January 1, 1985
THREE ANGELS BROADCASTING NETWORK	2963899	June 28, 2005	January 1, 1985
THREE ANGELS BROADCASTING NETWORK	2844695	May 25, 2004	January 1, 1985

## 5. FACTUAL GROUNDS

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

### a. **Jurisdictional Basis for the Administrative Proceeding**

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

### b. **The Complainant's Background and Marks**

1. The Complainant Three Angels Broadcasting Network (3ABN) is 24-hour Christian television and radio network established in 1985 by Danny Shelton as manifest by the Complainant's Articles of Incorporation annexed hereto as Annex B, filed in 1985 with the Illinois Secretary of State.<sup>1</sup> The Complainant was granted tax exempt 501(c)(3) status by the IRS on May 21, 1986 as evidenced by the IRS correspondence annexed hereto as Annex C.

2. The Complainant's ministry focuses on "Mending Broken People." Over the years, 3ABN has expanded to offer a variety of programs, including divorce recovery, drug and alcohol rehabilitation; cooking and health; special live events; stop smoking and weight loss;

<sup>1</sup> The Complainant's name was changed from Three Angels Broadcasting, Inc. to Three Angels Broadcasting Network, Inc. on June 12, 1996 by the filing with the State of Illinois annexed hereto as Annex D.

children and family issues; organic gardening; natural home remedies; gospel music programs; as well as a variety of inspirational themes from the Bible for children and adults.

3. Today, 3ABN beams its television and radio programming to eight satellites which carry its programming to every inhabited continent. 3ABN is the second largest Christian network in North America (with regard to numbers of owned and operated UHF stations).<sup>2</sup> 3ABN maintains facilities in Australia, Russia, the Philippines and New Guinea. Mr. Shelton is the founder and has been involved as a minister and presenter with 3ABN since its inception.

4. 3ABN has maintained a website for fifteen years at the gTLD <3abn.org> which it registered on July 23, 1997. [See WHOIS Detail Report annexed hereto as **Annex E**.] Screenshots of the 3ABN website are collectively annexed hereto as **Annex F**, showing some of the programs and services offered by the Complainant. In addition to its spiritual services, the Complainant offers books, videos, CDs, illustrations, and other inspirational materials for sale as shown by the Complainant's product catalog annexed hereto as **Annex G**.

5. The distinctive 3ABN name/mark is an abbreviation for THREE ANGELS BROADCASTING NETWORK and has been used continuously, extensively and exclusively to promote the 3ABN networks since 1985. The Complainant 3ABN has used the mark THREE ANGELS BROADCASTING NETWORK and promoted the 3ABN mark per se, and well numerous other 3ABN-formative marks, including but not limited to the following valid and subsisting registered US trademarks:

<b><u>Mark</u></b>	<b><u>Reg. No.</u></b>	<b><u>Reg. Date.</u></b>	<b><u>First Use</u></b>
3ABN	2895078	October 24, 2004	January 1, 1985
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THREE ANGELS BROADCASTING NETWORK	2963899	June 28, 2005	January 1, 1985
THREE ANGELS BROADCASTING NETWORK	2844695	May 25, 2004	January 1, 1985

6. The Complainant has invested heavily in protecting its intellectual property over the years by securing the marks detailed above. In addition to its 3ABN per se mark shown, most of the

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<sup>2</sup> 3ABN is not owned, operated or funded by any church, denomination or organization, so people from all cultures and backgrounds appreciate 3ABN programming, but many of 3ABN's employees and volunteers are members of the Seventh-day Adventist Church.

Complainant's marks incorporate the 3ABN dominant textual element into 3ABN-formative expressions. The TESS database records for each of the marks summarized in the table above are respectively annexed hereto as **Annexes H – R** (the "Marks").

7. The Complainant has received countless letters from customers whose lives have been blessed by 3ABN's ministry, including those annexed hereto as **Annex S**. As a provider of spiritual services, 3ABN depends upon its reputation and donations to sustain its financial operations and has great interest in protecting the integrity of its Marks.

**c. The Respondent's Background**

1. The Respondent registered <save-3abn.com> on December 25, 2007; <save-3abn.info> on January 20, 2008; and <3abnvjoy.com> on February 20, 2009 (collectively the "Disputed Domains"). The Respondent used a privacy registration services to hide his identity when registering each of the Disputed Domains in view of his intended illegitimate use of them. Copies of the WHOIS registration details for each of the Disputed Domains are collectively annexed hereto as **Annex T**.

2. The Respondent, with assistance from his collaborator Gailon Joy, has constructed and published a website resolved to by the Disputed Domains that contains libelous information antithetical to 3ABN's message. The website resolved to by the Disputed Domains contains gross misstatements of fact concerning 3ABN's actions and operations, baseless and untrue allegations of criminal conduct by the organization, and disparaging characterizations of 3ABN's officers, founder and its broadcast network. The Complainant has annexed screenshots of the Respondent's websites hereto as **Annex U** (the "Websites"). The Websites show that the Respondent's use of the Disputed Domains is calculated solely to interfere with the Complainant's business affairs and drive traffic intended for the Complainant to the Respondent's site.

3. Upon information and belief, the Respondent Robert Pickle developed a personal relationship with a former 3ABN director and employee Linda Shelton through their common religious affiliation. Linda Shelton is the x-wife of the Complainant's founder, Danny Shelton, and communicated to Robert Pickle statements critical of 3ABN, its board of directors, and its then-president.

4. Robert Pickle and his conspirators have desired for some time to see Linda Shelton reinstated as an employee and director at 3ABN and intend to discredit and damage the ministry as a means of facilitating Linda Shelton's reinstatement. To that end, the Respondent's website is replete with false and libelous information about the Complainant, and makes repeated use of the Complainant's mark 3ABN not just in the Disputed Domains themselves, but also in the meta title, meta keywords, and meta description which the Respondent has imbedded into the Websites. The Respondent wrongfully uses the Complainant's Marks to try and settle a feud with the founder Danny Shelton by poisoning the Complainant's customers against the Complainant's founder.

5. The Respondent's conduct evidences a malicious and purposeful campaign of libel, slander, and disparagement intended to embarrass, discredit, and defame 3ABN and its founder Danny Shelton and to vitiate, dishonor, and impair the reputation and goodwill of

3ABN and its officers. In short, the Respondent's use of the Disputed Domains is in bad faith.

6. The Respondent Robert Pickle has never been known by the name 3ABN and is attempting to impersonate the Complainant in search engine results through use of the Mark. The Respondent's actions have prevented the Complainant from reflecting its Mars in the Disputed Domains, and their registration and use is calculated only to create initial interest confusion on the part of individuals searching for 3ABN, its programs, ministry, services, and/or products.

7. The Disputed Domains were registered in bad faith by the Respondent with knowledge of the Complainant's trademark rights and are being used in bad faith. The Registrar in this action will not transfer the Disputed Domains without an order of this Panel. It is now incumbent upon the Panel in this action to decide the rights of the parties, and from the Panel the Complainant prays for a decision transferring the Disputed Domains to the Complainant.

**d. The Complainant's Registered Marks**

1. As shown above, the Complainant maintains numerous valid and subsisting registered US trademarks. The Complaint has been using the 3ABN per se Mark in commerce since 1985, when the Complainant first began its ministry. The other 3ABN-formative marks have all come into use and been registered in the intervening years since – most before any of the Disputed Domains were registered.

2. Individuals and other entities have come to recognize the Complainant's Marks as the distinctive identifiers that they are.

**e. Confusing Similarity**

1. Confusing similarity is self-manifest. The Disputed Domains wholly incorporate the registered 3ABN Mark. The first two Disputed Domains also include the subsidiary words "save." The third Disputed Domain contains the subsidiary work "vjoy," a reference to the dispute *3ABN v. Joy*. Panels have recognized in the past that the inclusion of a subsidiary word with the dominant textual feature of a mark at issue does not obviate confusing similarity.<sup>3</sup>

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<sup>3</sup> When a domain name incorporates in its entirety a distinctive mark, that creates sufficient similarity between the mark and the domain name to render it confusingly similar. *EAuto, L.L.C. v. Triple S. Auto Parts d/b/a Kung Fu Yea Enterprises, Inc.*, [WIPO Case No. D2000-0047](#). This similarity is established whenever a mark is incorporated in its entirety, regardless of other terms added to the domain name. *Wal-Mart Stores, Inc. v. Richard MacLeod d/b/a For Sale*, [WIPO Case No. D2000-0662](#). That is because "the issue under the first factor is whether the letter string of the domain name is confusingly similar to the letter string of the trademark, devoid of marketplace factors. . . . It is an objective test that looks only at the mark and the domain name; it is not a subjective test that also looks at the mental reaction of Internet users to the domain name." *Sermo, Inc. v. CatalystMD, LLC*, [WIPO Case No. D2008-0647](#). Thus, as the domain name incorporates the entirety of Complainant's mark, it is sufficiently similar to be confusingly similar to that mark.

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

#### **f. Rights and Legitimate Interest**

1. The Respondent maintains what has come to be known under the UDRP as a “gripe site” or “criticism site.” Throughout hundreds of decisions, the issue of legitimate interest with respect to gripe sites has become settled. Shortly stated, the majority view is now that a respondent is not making legitimate use of a domain name when that respondent uses a complainant’s own trademark in the domain to divert the complainant’s customers to the gripe site – particularly in cases in which the disputed domain name does not contain pejorative elements that would indicate the disputed domain was not associated with the complainant. The recent case of *Dar Al-Arkan Real Estate Development Company v. Anonymous Speech*, D2012-0692 (WIPO June 4, 2012) (ordering transfer of a gripe site) illustrates the majority view:

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

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

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

3. WIPO makes it clear above that the minority view has only been applied when “the domain name comprises the protected trademark plus a . . . derogatory term.” Examples of derogatory terms include “sucks,” “terrible,” “rip off” and the like. In this case, none of the Disputed Domains contain derogatory terms necessary to invoke the minority view of those panelists subscribing to it. This analysis is supported, inter alia, by *Skattedirektoratet v. Eivind Nag*, WIPO Case No. D2000-1314, (transferring <skatteetaten.com>); *Myer Stores*

*Limited v. Mr. David John Singh*, WIPO Case No.D2001-0763, (transferring <myeronline.com>), *Triodos Bank NV v. Ashley Dobbs*, WIPO Case No.D2002-0776, (transferring <triodos-bank.com>); *The Royal Bank of Scotland Group plc, National Westminster Bank plc A/K/A NatWest Bank v. Personal and Pedro Lopez*, WIPO Case No.D2003-0166, (transferring <natwestbanksucks.com>); *Kirkland & Ellis LLP v. DefaultData.com, American Distribution Systems, Inc.*, WIPO Case No.D2004-0136, (transferring <kirklandandellis.com>); and others.

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

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

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

6. The Respondent has not been commonly known by the name 3ABN, and the Respondent has acquired no trademark or service mark rights in Complainant’s Marks prior to notice of this dispute. The Respondent has not carried on any legitimate business at the Disputed Domains prior to notice of this dispute. See *Singapore Airlines Ltd. v. Robert Nielson (trading as Pacific International Distributors)*, WIPO Case No. D2000-0644 (Aug. 29, 2000). It goes without saying that the Complainant has not authorized, licensed, or otherwise permitted the Respondent to use its marks or the Disputed Domains.

7. Panels in the past have found that a respondent's use of the disputed domain name in a way that amounts to an attraction of visitors intended for the Complainant and is evidence of bad faith registration and use pursuant to Policy ¶ 4(b)(iv).

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

1. The Respondent registered the Disputed Domains for the nefarious, bad-faith purpose of creating initial interest confusions on the part of the Complainant's customers, diverting traffic intended for the Complainant, bankrupting the Complainant, embarrassing the Complainant's officers, seeking reappointment of dismissed directors, depriving the Complainant of use of its Marks in the Disputed Domains online<sup>4</sup>, and/or libeling the Complainant.<sup>5</sup> Further evidence of bad faith includes the Respondent's attempt to hide his misdeeds by refusing to identify himself in the registration information reflected in the Respondent's WHOIS records.

2. The Respondent registered the Disputed Domains with knowledge that the Complainant had registered trademark rights in the Disputed Domains. It was the very fact that the Respondent knew Internet users would be searching for the distinctive 3ABN mark that the caused Respondent to register the Disputed Domains. The Respondent's registrations themselves are evidence of the notoriety ascribed to the Marks by the Complainant.

3. The Respondent's registration of the Disputed Domain is an attempt to prevent the Complainant from reflecting its Mark in the Disputed Domain, to misappropriate the goodwill in Complainant's service mark, and to confuse the Complainant's customers.

4. The Respondent's unlawful conduct has and will damage the Complainant through the loss of customers, profits, business, and good will – as well as by damage to the Complainant's reputation and diluting the Marks themselves. The Complainant has suffered further damage through expenditures associated with bringing this action.

5. The Complaint prays for a decision of the panel restoring the Disputed Domains to the Complainant.

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<sup>4</sup> *Minnesota Mining and Manufacturing Company v. Mark Overboy*, WIPO Case No. D2001-0727, held that, “[t]he Respondent's registration of the domain names has been made with the purpose of preventing the Complainant from reflecting the mark in corresponding domain names – in order to force [complainant] into transfer-for-price negotiations.” Or, in this case, to force Complainant into reappointing a board member.

<sup>5</sup> The Respondent, having previously registered the domain <save3abn.org> has demonstrated a pattern of conduct of registering domain names incorporating the names of others is evidence of Respondent's bad faith registration and use pursuant to Policy ¶ 4(b)(ii). See *Armstrong Holdings, Inc. v. JAZ Assocs.*, FA 95234 (Nat. Arb. Forum Aug. 17, 2000) (finding that the respondent violated Policy ¶ 4(b)(ii) by registering multiple domain names that infringe upon others' famous and registered trademarks); see also *Sony Kabushiki Kaisha v. Anderson*, FA 198809 (Nat. Arb. Forum Nov. 20, 2003) (finding a pattern of registering domain names in bad faith pursuant to Policy ¶ 4(b)(ii) when the respondent previously registered domain names incorporating well-known third party trademarks).

6. **REMEDY SOUGHT**

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

7. **OTHER LEGAL PROCEEDINGS**

No other legal proceedings have been commenced or terminated in connection with or relating to the domain name that is the subject of this Complaint. ICANN Rule 3(b)(xi). The Complainant wishes to make the Panel aware, however, that there was legal action previously commenced between the parties in 2007 with respect to differing, but similar domain name, <save3abn.com>. The complainant commencing this dispute was filed by the Complainant hereto in the US District Court for the District of Massachusetts before Judge Dennis Saylor (Case No. 4:07-CV-40098). The case ultimately terminated with the bankruptcy of one of the principal Defendants. The Complainant initiating this case is annexed hereto as **Annex V**.

8. **COMPLAINANT TRANSMISSION**

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

9. **MUTUAL JURISDICTION**

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

10. **CERTIFICATION**

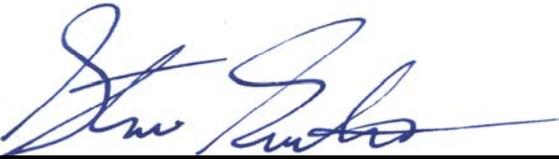
The Complainant agrees that its claims and remedies concerning the registration of the domain name, the dispute, or the dispute's resolution shall be solely against the domain-name holder and waives all such claims and remedies against (a) the National Arbitration Forum and panelists, except in the case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

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

Respectfully Submitted,

**THREE ANGELS BROADCASTING  
NETWORK, INC.**

By its attorney,

/s/ 

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Steven L. Rinehart  
*Attorney for the Complainant*  
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Date: November 1, 2012

<b>SCHEDULE OF ANNEXES <i>ICANN Rule 3(b)(xv)</i>.</b>	
Annex A	ICANN Uniform Domain Name Resolution Policy (UDRP)
Annex B	Articles of Incorporation
Annex C	IRS Letters Granting 501(c)(3) Status
Annex D	Illinois Corporate Name Change
Annex E	WHOIS Detail Report for <3abn.org>
Annex F	Screenshots of Complainant's Website
Annex G	Complainant's Product Catalog Cover
Annex H	TESS Detail Report for Mark 3ABN
Annex I	TESS Detail Report for Mark 3ABN PROCLAIM! NETWORK
Annex J	TESS Detail Report for Mark 3ABN URBAN REPORT
Annex K	TESS Detail Report for Mark 3ABN DARE TO DREAM
Annex L	TESS Detail Report for Mark 3ABN TEN COMMANDMENTS WEEKEND
Annex M	TESS Detail Report for Mark 3ABN DARE TO DREAM NETWORK
Annex N	TESS Detail Report for Mark 3ABN LATINO
Annex O	TESS Detail Report for Mark 3ABN RADIO NETWORK
Annex P	TESS Detail Report for Mark THREE ANGELS BROADCASTING NETWORK
Annex Q	TESS Detail Report for Mark THREE ANGELS BROADCASTING NETWORK
Annex R	TESS Detail Report for Mark THREE ANGELS BROADCASTING NETWORK
Annex S	Testimonials from Customers
Annex T	WHOIS Detail Reports for Disputed Domains
Annex U	Screenshots of Respondent's Websites

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

Annex V

Complaint in US District Court