

Court File No. T-977-20

FEDERAL COURT

(Court seal)



Graham Schreiber -> Formerly Landcruise.com

RS

Plaintiff

- and -

Jeffrey Levee	Joe Sims	Louis Touton
Eric Enson	Walter Kelly	Tara Zurawski
Jennifer L. Swize	Brian Winterfeldt	Sarah Deutsch
Jeremy Engle	Abigail Rubinstein	Robert Smith
Howard Rubin	Griffin Barnett	Kiran Malancharuvil
Paul McGrady	Marc Trachtenberg	David Barger
Amanda Katzenstein	Ian Ballon	Wendy Mantell
Kristina Rosette	Greg Shatan	Phil Corwin
J. Scott Evans	Kathy Kleiman	Paul McGrady
Stephen Coates	Doug Isenberg	Brett Fausett
Lori Schulmann	Mary Wong	John Berryhill
David Taylor	Lesley Cowley	Nick Philips
Byron Holland	Richard Plater	Nick Wood
Keith Drazek	Nick W Smith	Michele Neylon
Rubens Kuhl	Volker Greimann	Sally Costerton
Emily Taylor	PeterDengate Thrush	Jordan Carter
Vikram Kumar	Shane Tews	Peter Larsen
Benny Samuelson	Jonathon Nevett	Jeff Neuman
James Bladel	Keith Drazek	Milton Mueller
Garth Bruen	Justyna (Becky) Burr	Suzanne Radell
Mark Carvell	Laureen Kapin	Robert (Bobby) Flaim
Heather Dryden	Heather Forrest	Daniel (Danny) Marti
Jeff Ifrah	Timothy Hyland	David Deitch
ADR Forum	World Intellectual Property Organization	
Francis Gurry	Google	Facebook
Twitter	LinkedIn - LinkedIn Canada	
The United Kingdom Intellectual Property Office		

Defendants

STATEMENT OF CLAIM TO THE DEFENDANT

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or a solicitor acting for you are required to prepare a statement of defence in Form 171B prescribed by the Federal Courts Rules serve it on the plaintiff's solicitor or, where the plaintiff does not have a solicitor, serve it on the plaintiff, and file it, with proof of service, at a local office of this Court, WITHIN 30 DAYS after this statement of claim is served on you, if you are served within Canada.

If you are served in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period for serving and filing your statement of defence is sixty days.

Copies of the Federal Court Rules information concerning the local offices of the Court and other necessary information may be obtained on request to the Administrator of this Court at Ottawa (telephone 613-992-4238) or at any local office.

IF YOU FAIL TO DEFEND THIS PROCEEDING, judgment may be given against you in your absence and without further notice to you.

(Date) August 27, 2007 **STAN CHERBERG**
SENIOR REGISTRY OFFICER
AGENT PRINCIPAL DU GREFFE

Issued by: _____
(Registry Officer)

Address of local office: _____

180 Queen Street West
Suite 200
Toronto, Ontario
M5V 3L6

180, rue Queen Ouest
bureau 200
Toronto, Ontario
M5V 3L6

TO: Members of an *Unincorporated association[s]* Et Al.

Jeffrey Levee

Joe Sims

Louis Touton

Eric Enson

Walter Kelly

Tara Zurawski

Jennifer L. Swize

c/o Attorneys of Record.

12025 Waterfront Drive, Suite 300, Los Angeles, CA 90094-2536, USA.

Phone: +1 310 301 5800 Fax: +1 310 823 8649

Brian Winterfeldt

Sarah Deutsch

Jeremy Engle

Abigail Rubinstein

Robert Smith

Howard Rubin

Griffin Barnett

Kiran Malancharuvil

Paul McGrady

Marc Trachtenberg

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Kristina Rosette

Greg Shatan

Phil Corwin

J. Scott Evans

Kathy Kleiman

Paul McGrady

Stephen Coates

Doug Isenberg

Brett Fausett

Lori Schulmann

Mary Wong

John Berryhill

David Taylor

c/o Intellectual Property Constituency

12025 Waterfront Drive, Suite 300, Los Angeles, CA 90094-2536, USA.

Phone: +1 310 301 5800 Fax: +1 310 823 8649

Lesley Cowley	Nick Philips	Byron Holland
Richard Plater	Nick Wood	Keith Drazek
Nick W Smith	Michele Neylon	Rubens Kuhl
Volker Greimann	Sally Costerton	Emily Taylor
PeterDengate Thrush	Jordan Carter	Vikram Kumar
Shane Tews	Peter Larsen	Benny Samuelson
Jonathon Nevett	Jeff Neuman	James Bladel

c/o Contracted Parties of R[r]egistry & R[r]egistrar:
ICANN / [IANA - Top Level & Country Code Top Level Domains.
12025 Waterfront Drive, Suite 300, Los Angeles, CA 90094-2536, USA.
Phone: +1 310 301 5800 Fax: +1 310 823 8649

Milton Mueller Garth Bruen
c/o DNSO / GNSO & NARLO.
12025 Waterfront Drive, Suite 300, Los Angeles, CA 90094-2536, USA.
Phone: +1 310 301 5800 Fax: +1 310 823 8649

Justyna (Becky) Burr	Suzanne Radell	Mark Carvell
Laureen Kapin	Robert (Bobby) Flaim	Heather Dryden
Heather Forrest	Daniel (Danny) Marti	David Redl
Fiona Alexander		

c/o GAC - Government Advisory Council Et Al.
12025 Waterfront Drive, Suite 300, Los Angeles, CA 90094-2536, USA.
Phone: +1 310 301 5800 Fax: +1 310 823 8649

ICANN - Approved UDRP Providers.
ADR Forum & World Intellectual Property Organization & Francis Gurry.
c/o 12025 Waterfront Drive, Suite 300, Los Angeles, CA 90094-2536, USA.
Phone: +1 310 301 5800 Fax: +1 310 823 8649

Google
c/o David Knight & Lucy Nunn.
Fieldfisher / Fieldfisher Waterhouse UK.
Riverbank House 2 Swan Lane London EC4R 3TT England.
Phone: +44 (0)20 7861 4228 Fax: None listed.

Jeff Ifrah - Timothy Hyland David Deitch
1717 Pennsylvania Ave, N.W. Suite 650 Washington, DC 20006. USA.
Tel: (202) 524-4140 Fax: (202) 524-4141

LinkedIn - LinkedIn Canada:
250 Yonge St #2500, Toronto, ON M5B 2L7.
Telephone: 1 855-498-9963

Facebook.
c/o Director Garrick Tiplady
94 Walmer Road, Toronto ON M5R 2X7.
No telephone or fax number published, with Federal Corporation Information.

Twitter:
1355 Market St #900, San Francisco, CA 94103, United States.
+1 415-222-9670.

The United Kingdom Intellectual Property Office:
Concept House Cardiff Road Newport South Wales NP10 8QQ United Kingdom
Telephone: +44 0300 300 2000 Fax: +44 0300 0200 015

CLAIM:

- 1 The Plaintiff claims:
- a) A declaration thatL
 - i) I, Graham Schreiber and other victims [not] included as Plaintiffs; will be listed in an Exhibit 1, have been harmed, in [various degrees] by the “Kingpins” listed above for: Conspiracy to, Aiding, Abetting, Harboring & Flanking a .COM Domain Name & Sub-Domain Name Extortion / Racket, wherein Domain Names have been [passing off] as National ccTLDs and under the World. Wide. Web’s .COM meant to carry and communicate a business Trademark TM to a global consumer audience - Online.
 - ii) Was denied Federal & State protection under the U.S. Lanham Act ACPA, for my Common Law Rights, applicable to Landcruise.COM which equals a TM right and also my right to U.S. Federal protection, having had a USPTO ® along with a CIPO ®.
 - b) Three (3) Defendants, listed as “Attorneys of Record” “volunteered” and built ICANN; so Jones Day forfeits Attorney Client Privilege. Being founding “Stakeholders” inside ICANN they are the “puppeteers” who assign the “Stakeholders” their exacting Remit and the definitive boundaries of Remit. They have a **Conflict of Interest**. These Attorneys as a group committed, aided, abetted, harboured and flanked a Perjury, to support the racketeering.
 - c) All Defendants collectively, have not “attempted” but succeeded in the conspiracy of aiding, abetting, harbouring, flanking the trafficking of a Counterfeit Mark, which is also confusingly similar to, a misleading country code identifier and a Counterfeit Geographic Indication.
 - d) Because the Canadian Court and the Canadian Government have [only recently] begun to seriously recognize Domain Names as Intellectual Property, integral to business on the World.Wide.Web of .COMmerce and joined the Madrid Protocol, last year, this Court [must] hear this case; and grant some administrative leniency / kindness to the Pro Se Plaintiff, when it comes to “speaking truth to power” against Attorneys who know how to game-the-system, with procedural dexterity, which if not furnished, will permit the extortion to continue, after this “canary in the coal mine” suffocates.
- 2 The relief I claim is:
- A) The ownership assignment to me, by the Court, of all the .COM Domain Names owned by CentralNic, or their “arms length” owners entities and those domain names recently sold, when they divested themselves of the Infringing, Diluting, Blurring, Misleading & Confusingly similar, quasi-cc.COMs sold in their divestment.
 - B) \$5,000,000.00 USD [from each conspiring Defendant] which is the applicable relief stated, in: 18 U.S. Code § 2320. Trafficking in counterfeit goods or services.

STATEMENT OF CLAIM

[1] My own harm from .COM Racketeering and Passing-Off; and the harm to victims who've been duly well-informed via social media and other efforts over time, of this issue, via my painstaking litigation, that began in 2012 via Twitter { accounts which have been muted by Defendant, Twitter} in addition to Defendant's LinkedIn, Facebook and Google, for trafficking intellectual property / domain names.

[2] My efforts were quashed by Alexandria, Virginia Judge Gerald Bruce Lee, who according to an ICANN Stakeholder & Defendant = "Kingpin" Mr. Garth Bruen. Who stated in writing, as will be Exhibited, that the Judge decided to "gamble and "Flush" the case, harming [all .COM] Domain Name Registrants, on the - World.Wide.Web and exposed Consumers to Counterfeits.

[3] My Pro Se allegations are described with SCOTUS and other globally accepted, legal terms; and what they describe are "exceptional & extraordinary circumstances".

[4] Since I was quashed by the Cartel, they have been causing additional harm, to others well in excess of thirty (30) months, which is an obliging qualifier, that calls this honourable Court to action. [The U.S. Court acted like the FAA, to Boeing lately; and neglected their public duty.]

[5] I anticipate that our Federal Ministers shall bear witness to this case, as they have to date been helpful, so they may suitably address the issue I present, warranted under or from the USMCA & CPTPP Trade Agreements; to ensure the problem, as it was, is addressed in future Trade Agreements, now being drafted, to protect Consumers and Intellectual Property.

[6] As the cartel of Kingpins is so broad wealthy and powerful, they have well infiltrated and drawn from Governments, influential people as lobbyists in the U.S.A, at the District of Columbia, Virginia, in Canada, the UK and Globally to [knowingly] harbour the racket.

[7] Harms arising in the European Union, United Kingdom and beyond, have occurred, owing to their "wilful blindness" and their distinct willingness to conspire with the people, here listed as Defendants, having managed at and within ICANN for over 20 years, to undermine the "Common Laws" of Nations, and hurting the citizens of their countries enterprises via fraudulent and misleading representations of .COM Domain Names as National ccTLD's such .CA for Canada, .US for the United States, .UK for United Kingdom, etc, through a passing-off racket.

[8] Some of the "Kingpins" as Defendants listed are and were Lawyers; and the law firms, they represent, as ICANN Accredited Registries, have - committed, aided, abetted, harboured and flanked perjury, that has allowed the shakedown racket to continue, with a victims likely now, still being shaken-down at the ADR Forum, or by CentralNic's own Dispute Resolution Policy.

[9] Others represent Social Media Corporations; have conspired to trafficking my Common Law .COM and my lapsed USPTO Federally Registered Mark / Trademark, have been “willfully blind” conspirators and some have travelled to [supposedly defend] Intellectual Propriety Rights Holders, at ICANN soirees worldwide, funded by Domain Name Registrants, via ICANN; and these companies are Facebook & Twitter.

[10] LinkedIn applied to get funding from ICANN, facilitated by Brian J Winterfeldt and the DISCOVERY process will enlighten; as LinkedIn [knowingly] trafficked my Mark, Trademark & Trade Name.

[11] The conspiracy has made it impossible for [many] unknown victims to get the full and global protection that collective Common Laws afford, which are expressed and available as Madrid Protocol Marks via WIPO’s who have Panelists that conspired with / are, ICANN’s “Kinpins” who have profited from Extortion / Racketeering, by fundamentally Shaking-down people and their enterprises, worldwide, rather than going to VaED.

[12] The DISCOVERY process will enlighten the Court; and as the Defendant’s all know, I’ve got everything discovered; and it’s been posted on Twitter, LinkedIn and Facebook. These same Defendants have not sued me for slanderous and libellous remarks posted to the Defendants Social Media websites!

[13] I’ve made statements via those Social Media resources which would, if they were untrue, subject me to a singular lawsuit or multiple lawsuits from the Defendants listed, for: Defamation, Slander and Libel.

[14] As yet, these well taunted Defendants have all conspired together, in collective silence, anticipating that their grandeur and my insignificance would, maintain safe passage, for them to continue.

[15] As the vast majority of the Defendants are well schooled, powerful U.S. Attorneys, it’s my expectation that the Court oblige them to address the charges here stated, or collectively for their defence, they must File a lawsuit with this Court, charging me for what could be [but aren’t] remarks constituting Defamation, Slander & Libel against them, which again, I’ve posted on some of the Defendants own clients, Social Media Platforms.

[16] Should they counter-sue me, I will happily attend to the Supreme Court in Washington, D.C, if this court under USMCA rules available, figure they can abdicate jurisdiction to the District of Columbia, where in my defence, I will expect SCOTUS 14-1480 to be evaluated, for my defence along with a comprehensive review of all the Discovery they ignored, under the probable influence of [Defendant] Former VaED Judge, Walter D. Kelley.

APPLICABLE LAW

Racketeering: U.S. Law: 18 U.S. Code § 2320. Trafficking in counterfeit goods or services.

[17] This aspect of U.S. Federal Law most accurately encompasses Domain Names, used as Sub-Domain Names, at the Third Level, as they have been defined by Defendant, Graham Smith as "Quasi cc-TLDs" in his book.

[18] With this filing, I'll also be submitting numerous Discovery documents, that show unequivocally the intention was to cause consumer confusion; as some of the Defendants confirmed as much on Social Media.

(a) Offences.—ever intentionally—

(1) traffics in goods or services and knowingly uses a counterfeit mark on or in connection with such goods or services,

(2) traffics in labels, patches, stickers, wrappers, badges, emblems, medallions, charms, boxes, containers, cans, cases, hangtags, documentation, or packaging of any type or nature, knowing that a counterfeit mark has been applied thereto, the use of which is likely to cause confusion, to cause mistake, or to deceive, or attempts or conspires to violate any of paragraphs (1) through (4) shall be punished as provided in subsection (b).

[19] Top Level Domains and Country Code Top Level Domains are to Domain Names like; Labels, Wrappers, Containers, Documentation, Packaging people HTML coded websites to the internets Worldwide consumer base.

[20] A Domain Name is a fact-track through local Common Law and International Common Law's that lead to National Trademark Registration, at their point of origin and upward, as in my case, where I secured a USPTO Registered Trademark; but was obstructed by the Kingpins and the UK IPO, blankety refused to observe the Jurisdiction, Venue and Origin of .COM's which is Alexandria Virginia, convenient to bot the DoC & Networks Solutions and now Verisign, from getting a UK IPO Trademark; and next a Madrid Trademark.

[21] I'll put the text of Subsection (b) in the part of the document that address Relief.

[22] All Defendants listed present in [various degrees] of proximity and power to have quashed the racket; however, none were proactive. They hunkered down, with their conspiring to maintain the racket, via their well vetted structured stations on the R[r]egistry & R[r]egistrar, Stakeholders, bottom-up, consensus-based hierarchy, which was skillfully crafted by the [Volunteers] built ICANN, from Jones Day, being Defendants Joe Sims, Jeff LeVeve and Louis Touton.

[23] Racketeering and Extortion is the applicable legal term; and the intent of the R[r]egistry & R[r]egistrar community was freely left unveiled.

[24] The obligation of Common Law .COM Rights holders under the ACPA and Federal Rights holders, at the USPTO or elsewhere, amongst Madrid Protocol party nations, was that Domain Name Registrants must [Defensively Register] our domain names, under each of the self serving “new gTLDs” and “quasi ccTLDs” the Community was able to formulate and place, or not place, on the IANA Root Zone List.

[25] Following and resulting from the Kingpins racketeering; I was denied protection under the **Anticybersquatting Consumer Protection Act of 1999 (ACPA) - An amendment (15 U.S.C. § 1125(d))** to the Lanham Act that creates a civil cause of action for owners of certain federally protected trademarks against a person that both:

* Registers, traffics in, or uses a domain name that: is identical or confusingly similar to the mark; or

* in the case of a famous mark, dilutes the mark.

Has a bad faith intent to profit from the mark. The ACPA applies to the following types of trademarks [[(whether registered or unregistered)]] protected under the Lanham Act: Marks that are distinctive or famous at the time the relevant domain name was registered. - under or as, quasi Country Code, Top Level Domains of CentralNic, which are Sui Generis, Misleading, Confusing, Deceitful antitrust practices.

[26] At this point; the Court must know and Discovery will show, that CentralNic tried and failed, to have their .COM Domain Name of .UK.COM added into the U.S. Department of Commerces IANA Root, at the dawn of the Internet Industry, to which they still have substantive influence, even though the veneer is an accountable, public interest corporation [Californian not for profit Corporation] being ICANN, run ultimately by the puppeteers, volunteers from Jones Day, issued the strict “remit” boundaries, in which all the Stakeholders would figuratively speaking, sit in a circle and look inwards at whatever “issue” the puppeteers structured them to address.

[27] If and when, the “Defensive Registrations” obliged by ICANN’s R[r]egistry & R[r]egistrar “Stakeholders” = “Kingpins” and specifically CentralNic [weren’t purchased] assailants would strike; and Infringe, Dilute, Blur and Pass-Off as our online business, individually with identical and confusingly similar domain name, faking to be appointed or an authorized agent of the primary Registrant, in a country ’s entrepreneurs Intellectual Property may or may not have been protectable at Common Law Trademark, under Madrid Protocol Rules, as it / they fulfilled the obligations of local National laws, to become a Registered Trademark, as I secured in the USA with USPTO, after the CIPO did their work.

[28] Once this filing is Docketed and alive, I’ll present exhibits that list all the countries where .COM domain name registrants were and are still vulnerable to attack by cybersquatting.

[29] The legal definition of this is [CONTRIBUTORY] Infringement, Dilution, Blurring and Passing-Off, as per U.S. Law: 15 U.S. Code § 1125. False designations of origin, false descriptions, and dilution forbidden. In addition to Passing-Off, under Canadian Law.

[30] The final Applicable Law that's been violated is that of Perjury: Only those Defendants listed participated in, enjoined, co-wrote, endorsed, presented in person in Court, or helped in some other descriptive manner, to draft and present the perjured U.S. Filings, must so be charged with perjury and conspiring to aid, abet, harbour and flank perjury.

[31] Perjury under Canadian Law: 131 (1) every one commits perjury , with intent to mislead, makes before a person is authorized by law to permit it to be made before him a false statement under oath or solemn affirmation, by affidavit, solemn declaration or deposition or orally, knowing that the statement is false.

[32] Perjury under United States Law: 18 U.S. Code § 1621. Perjury generally ever—
(1) having taken an oath before a competent tribunal, officer, or person, in any case in which a law of the United States authorizes an oath to be administered, that he will testify, declare, depose, or certify truly, or that any written testimony, declaration, deposition, or certificate by him subscribed, is true, willfully and contrary to such oath states or subscribes any material matter which he does not believe to be true; or
(2) in any declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true;
is guilty of perjury and shall, except as otherwise expressly provided by law, be fined under this title or imprisoned not more than five years, or both. This section is applicable whether the statement or subscription is made within or without the United States.

[33] United Kingdom: Perjury Act 1911

(1) If any person lawfully sworn as a witness or as an interpreter in a judicial proceeding wilfully makes a statement material in that proceeding, which he knows to be false or does not believe to be true, he shall be guilty of perjury, and shall, on conviction thereof on indictment, be liable to penal servitude for a term not exceeding seven years, or to imprisonment . . . F1 for a term not exceeding two years, or to a fine or to both such penal servitude or imprisonment and fine.

(2) The expression "judicial proceeding" includes a proceeding before any court, tribunal, or person having by law power to hear, receive, and examine evidence on oath.

(3) Where a statement made for the purposes of a judicial proceeding is not made before the tribunal itself, but is made on oath before a person authorized by law to administer an oath to the person makes the statement, and to record or authenticate the statement, it shall, for the purposes of this section, be treated as having been made in a judicial proceeding.

APPLICABLE LAW ~ TRADE AGREEMENTS

[34] Thanks to the careful hand of the Right Honourable Chrystia Freeland in her prior portfolio, she succeeded at making Domain Names an integral aspect of Intellectual Property Law, not just in and for Canada locally, but for Canadian's on the global business stage, as such this Court may address issues in / under USMCA & CPTPP, as it is inclusive of Domain Names, as Intellectual Property:

CPTPP:

Consolidated TPP Text – Chapter 18 – Intellectual Property

Section C: Trademarks

Article 18.28: Domain Names

and

Section D: Country Names

Article 18.29: Country Names

and

Section E: Geographical Indications

Article 18.30: Recognition of Geographical Indications

USMCA or locally referred to as; new NAFTA or CUSMA:

CHAPTER 20 INTELLECTUAL PROPERTY RIGHTS

Section C: Trademarks

Article 20.27: Domain Names

and

Article 20.28: Country Names

and

Article 20.29: Recognition of Geographical Indications

Comprehensive Economic and Trade Agreement

Chapter twenty: Intellectual property

Sub-section B – Trademarks Article 20.13 – International agreements

Sub-section C – Geographical Indications

Canada-Mercosur Free Trade Agreement

A work in progress.

[35] Intellectual Property and Geographical Indications: Formal indexing of these two widely accepted World Trade Organization titles are not published.; as: “Canada has agreed with the other parties, as is the standard international practice when negotiating international agreements, that only the final text will be shared once it is agreed upon by all negotiating parties.”

[36] A Discovery document that will be furnished, is an email I received from Ms. Freeland's office; thanking me for informing her and the Washington D.C. Consulates Trade Commission, that the American's were having a Congressional Trademark Caucus meeting.

[37] A meeting where Kingpins, Brian Winterfeldt & Jonathon Nevett presented, after his perjury was published and docketed flanked by the defendants, above listed.

APPLICABLE LAW ~ INTERNATIONAL TREATIES:

[38] The Madrid Protocol: Is controlled by WIPO.

[39] Point of fact, WIPO is a branch agency of the UN, which is a New York State listed Corporation, with chosen judicial obligation under the laws of the District of Columbia, so Francis Gurry was obliged to address SCOTUS for 14-1480, but didn't and was silent, with unwarranted, Swiss protection.

[40] Also thanks to the Right Honourable Chrystia Freeland, Canada [finally] became a member of the Madrid Protocol in March of 2019, and our participation entered into force on June 17th 2019, which also means the Court should lean more about this Intellectual Property resource.

[41] The United Kingdom became members of this system in 1995 and the United States in 2003.

[42] I suspect the UK & US were compelled to join as the “Dot COM Boom” made it possible for home businesses and established corporations to immediately and easily .COMMunicate their goods and services to a global / worldwide audience, through a single medium. As the RFC 1591 ~ Domain Name System Structure and Delegation, of March 1994 explains.

[43] RFC 1591 is a document of The Network Working Group, which was primarily & technically run by Jon Postel. Jon received “volunteers” legal help from Defendants Joe Sims, Jeff LeVee & Louis Touton, of and outside their billing framework of Jones Day.

[44] Independently and of their own free will, as “Volunteers” [severs their “right” to Attorney Client Privilege] as they were doing this work [freely] to ensure in perpetuity, thousands of billable hours for themselves in the future, be they at Jones Day, or of / at a law firm of their own creation, at some future point.

The United Kingdoms Intellectual Property Office is a Defendant:

[45] As I was subject to and supposedly protected by, the Laws of the United States and their Lanham Act's ACPA plus the US & UK participation in Madrid Protocol: as a .COM Domain Name Registrant, I was / would have been entitled to apply for the "Landcruise" Mark / Trademark and Worldwide protection, given my progress through fulfilling all the Common Law obligations, in a number of countries ~ specifically in the UK.

[46] Nominet; the UK government yielded to, when Willie Black ran the .UK Registration of domains under .UK / .co.uk, in the IANA, prior to Nominet, have all [knowingly] allowed UK consumers to be exposed to frauds and counterfeits, via sub-domains under confusingly similar / misleading / .UK blended with .COM domain name masquerading as a ccTLD in the confusing and misleading form of .UK.COM in association with "official" ccNSO Registries, listed in the IANA Root list; and Nominets key staff are listed as Defendants.

[47] The United Kingdom Intellectual Property Office issued a Trademark Registration to an entity applied for and received Registration, using a fraudulent ccTLD, the uk.com domain name; and as they refused to address my concern, they have been Trafficking a counterfeit mark.

[48] The Intellectual Property Office is aware of the distinction between an "Official" IANA Root Zone ccTLD and a Domain Name; and discovery will illustrate "knowing".

[49] Similarly, the U.S. DoC / NTIA yielded to Sims, LeVee & Touton in the person of primarily and not limited to, Defendant Becky Burr, 's been well favoured and rewarded by Sims, LeVee and Touton doing business long after their volunteering, became profiting from their volunteer "investment" of time and effort. All this history will is documented and will be presented in Court, as Discovery.

[50] Nominet's staff and contractor are and were, well informed about the fraud; and did nothing, to quash a crime, sticking persistently to working within their ccNSO assigned remit, being wilfully blind and conspiring to harm more UK business, since my interaction with them, as documented.

APPLICABLE LAW / USE OF & APPLICATION OF AMERICAN LAW:

[51] In Canada, we don't have a similar or identical law to the U.S. RICO Law, as confirmed in a letter to me, from the office of, The Right Honourable Navdeep Bains, which I'll present later.

[52] Therefore under the USMCA our Federal Court is, I believe, obliged under the terms of the USMCA & CPTPP Trade Agreements to, use existing and established laws, which are Federally published in member countries, specifically the United States, which clearly instruct preset penalties.

[53] The applicable existing U.S. Law is the RICO Act / Law; which is expressed in the Applicable Law section.

[54] The "Kinpins" as "Stakeholders" funded by ICANN, to represent Domain Name Registrants, within the IPC, ccNSO, Business & Public Internet Use, Constituent Group's Et Al, have, in [various degrees] conspired to, committed, aided, abetted, harboured and flanked a perjury originally expressed to Judge Gerald Bruce Lee, in Alexandria, the Eastern District of Virginia, longer than thirty (30) months ago, a consequence which since has left others harmed, are listed in [Exhibit: 1.] which will be filed later.

RELEIF SOUGHT:

[55] The plaintiff therefore claims relief as follows and from these Legal Code Penalties:

18 U.S. Code § 2320. Trafficking in counterfeit goods or services

(b) Penalties.— (1) In general.—ever commits an offences under subsection (a)—
(B) for a second or subsequent offences under subsection (a), if an individual, shall be fined not more than \$5,000,000 or imprisoned not more than 20 years, or both, and if other than an individual, shall be fined not more than \$15,000,000.

Based on Law:

I seek to be awarded \$5,000,000 USD [from each defendant] for the Racketeering / Extortion aspect as stated as due relief, in published law.

Penalties for Perjury:

General National laws, have penalties for the crime of Perjury, as related to the select few have this charge listed; and I would like to see suitable existing punishments applied.

ADDITIONAL RELIEF SOUGHT:

[56] As the U.S. Department of Commerce has been grossly negligent along with the National Telecommunications and Information Administration, I would like the Court to [ORDER] the U.S. Department of Commerce and National Telecommunications and Information Administration, to reassign [their] .COM & .US > Top Level Domains to the Federal Communications Commission and have the Registries of Verisign & Neustar removed; because of corruption and negligent duty of care, to protect:

A) Registrants Enterprises from Racketeering and Contributory Cybersquatting and

B) To protect Consumers from fraudulent "quasi ccTLDs" trafficking online goods and services to and by unauthorized agents, vendors and cybersquatters, as has occurred.

[57] Similarly, I'd like all IANA ccTLDs to be assigned to the related Regulators in Canada, UK, EU, Brazil specifically and Worldwide function as the FCC, so that Websites are held to the communications standards of Print Media, Radio and Television companies.

[58] My objective: To ensure the Privacy Zealots have their surfing privacy, I want all domain name based websites to conform to National Broadcasting Standards, as applicable to Print Media, Radio and Television companies.

[59] Why: Because it will, I believe, substantively help quash the criminal activity of Human Trafficking and other crimes communicated online, as and from vendors are .COMMunicating online, as they will become prohibited by National Laws, from communicating illegal services.

[60] To ensure relief is received, once [Ordered] as most Defendants are U.S. Attorneys; and to ensure they don't cleverly evade Notice of Service [a lesson taught and learned from experience with Timothy Hyland] I've gone beyond serving the Defendants all as [funded ICANN Stakeholders] and in some cases, [unfunded] ICANN Stakeholders, via the Attorneys of Record, will continued communication [30+ Months Forward] via email. Notices will also be broadcast via Social Media.

[61] For those Perjured Attorneys of Record, and some other Kingpins, I've communicated with, from my efforts longer than thirty (30) months ago, a [USMCA obligation] when emailing was mutually accepted for communications, I sent their Service of Notice Documents to their State Bar's, so the State Bars may act as their "Authorized Agents to receive Service".

[62] The other reason I did this was because, once the [Order] is issued, for them to pay the penalties, that I have rock-solid-grounds to receive, the State Bars will have an obligation to get the funds required in the Court Order, from the Attorneys Errors & Omissions insurance policy.

The plaintiff proposes that this action be tried at:

Federal Court of Canada,
180 Queen St W,
Toronto, ON
Canada.
M5V 1Z4.

(Date) AUGUST 24TH, 2020

Dated at the day of, 20



(Signature)

Graham Schreiber

Once dba Landcruise.com & Landcruise Canada Ltd.

29 Senator Ave,
Hamilton, Ontario,
Canada.
L8L-1Z3.

Telephone: 1.416.803.4678.
Email: grahamschreiber@gmail.com

SOR/2004-283, s. 35

- R.S., 1985, c. F-7, Sch.
- 2002, c. 8, s. 5