

TRUMP
THE TRUMP CORPORATION

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Via E-mail and Regular Mail

ProngMedia Inc.
c/o Dynadot Privacy Registrant
PO Box 701
San Mateo, CA 94401
privacy@dynadot.com

Re: *trump2016.com*

Dear Gentlemen:

I am writing on behalf of Donald J. Trump, the well-known businessman, real estate developer, and star of the television show *The Apprentice*.

The Trump® name is internationally known and famous as a result of Mr. Trump's long, extensive, and high-profile business activities. Mr. Trump is the owner of the Trump® name as a trademark, as well as hundreds of trademarks that incorporate the Trump® name, all of which we scrupulously protect.

With this background in mind, it has come to our attention that you have registered the domain name *trump2016.com* (the "Domain Name"). Your unauthorized use of such Domain Name constitutes willful trademark infringement and cyber piracy. Such unauthorized use of the Trump® name as described above will inevitably cause confusion in the public's mind and dilute and tarnish the value of the Trump® mark. Your use of the Trump® mark violates Mr. Trump's common law and federal trademark rights, including, inter alia, under Section 43(a) of the Lanham Act, 15 U.S.C. § 1125. The Lanham Act provides that Mr. Trump may recover (1) your profits, (2) any damages sustained by Mr. Trump, and (3) the costs of bringing an action against you (which may be tripled by the reviewing court).

Additionally, your illegal registration and use of the infringing Domain Name subjects you to liability under the Anticybersquatting Consumer Protection Act, 15. U.S.C. § 1125(d) ("ACPA"). The ACPA renders a person liable in a civil action who, in bad faith, registers a domain name that is identical or confusingly similar to the trademark of another person. Your liability to Mr. Trump under the ACPA is in the amount of up to \$100,000 per domain name registration. 15 U.S.C. § 1117(d).