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Attorneys for Plaintiff  
Allan Mansoor

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA,  
SOUTHERN DIVISION

**Allan Mansoor,**

Plaintiff

vs.

**John Doe, and**  
DOES 2 through 25, inclusive,  
Defendants.

Case No.:

**Complaint for Injunctive Relief and  
Damages**

Demand for Jury Trial

Plaintiff Allan Mansoor alleges:

1. Plaintiff Allan Mansoor is the rightful owner of the Internet domain name <AllanMansoor.com>. Mansoor used the domain to support his political activities starting with his first campaign for City Council in 2002. The domain was in Mansoor's continuous use and possession from 2002 through 2016 when it was hijacked and repurposed as a website that uses his name to advertise pornography.

1 2. Mansoor brings this action against John Doe, the unknown operator of  
2 “Allan’s Adult Reviews,” presently located on the Internet at  
3 <AllanMansoor.com>, to recover the Internet domain name that is rightfully his.

### 4 PARTIES

5 3. Plaintiff **Allan Mansoor** is an individual residing in the City of Costa Mesa,  
6 County of Orange, State of California. He is currently a member of the Costa Mesa  
7 City Council, a position he previously held from 2002 to 2010 and most recently  
8 starting in December 2016.

9 4. Defendant **John Doe** is a person or entity unknown to Plaintiff. Plaintiff is  
10 informed and believes that John Doe acquired the <AllanMansoor.com> domain  
11 name for the purpose of disparaging Plaintiff’s good name and profiting from  
12 Plaintiff’s goodwill by operating the website “Allan’s Adult Reviews” at  
13 <AllanMansoor.com> to sell advertising promoting memberships in pornography  
14 websites.

15 5. The true names of Defendant DOES 2 through 25, inclusive, are unknown to  
16 Plaintiff who therefore brings this Complaint against DOES 2 through 25, inclusive,  
17 by such fictitious names and will seek leave of this Court to show their true names,  
18 identities, and capacities when they have been ascertained.

### 19 JURISDICTION AND VENUE

20 6. This Court has subject matter jurisdiction over this case pursuant to 28  
21 U.S.C. §§ 1331 and 1338 because this civil action arises under the Lanham Act,  
22 specifically 15 U.S.C. § 1125(d). This Court will have supplemental jurisdiction  
23 over any other state law claims pursuant to 28 U.S.C. § 1367(a).

24 7. Venue is proper in the United States District Court for the Central District  
25 of California, Southern Division, pursuant to 28 U.S.C. § 1391(b)(2) because this  
26 action relates to Allan Mansoor who resides and does business in California’s  
27 Central District, Southern Division.

28 8. This Court has personal jurisdiction over Defendants because their actions

1 were specifically targeted at Plaintiff, who resides in California's Central District,  
2 with knowledge that their actions would have an effect in the State of California.  
3 Furthermore, Defendants acquired the Internet domain name  
4 <AllanMansoor.com>, which relates to a public official in the State of California  
5 and used the domain name in a way that they knew or should have known would  
6 cause injury to Plaintiff in the State of California. Defendants are subject to  
7 California's long arm statute, California Code of Civil Procedure section 410.10, on  
8 the basis that personal jurisdiction over Defendants does not violate the United  
9 States Constitution.

#### 10 **FACTS COMMON TO ALL CAUSES OF ACTION**

11 9. For more than 12 years, Plaintiff Allan Mansoor has served in public office,  
12 starting first on the City Council of Costa Mesa (2002 to 2010); then in the  
13 California State Assembly (2010 to 2014); and most recently, his December 2016  
14 return to the Costa Mesa City Council.

15 10. Before his first campaign for City Council in 2002, Mansoor acquired the  
16 Internet domain name <AllanMansoor.com>. He used the domain to operate a  
17 website promoting his campaign.

18 11. Mansoor was successful in his 2002 campaign and served on the City  
19 Council through 2010 when he was elected to the State Assembly. He served in the  
20 State Assembly through 2014. Throughout this time, Mansoor used the domain  
21 <AllanMansoor.com> to communicate and build relationships with his  
22 constituents. He also used it to support his 2006 campaign for reelection to the City  
23 Council; his 2010 and 2012 campaigns for State Assembly; and his 2014 campaign  
24 for Orange County Supervisor.

25 12. Mansoor left public office in December 2014 after his unsuccessful campaign  
26 for County Supervisor. His <AllanMansoor.com> website remained online as an  
27 archive of Mansoor's public service activities.

28 13. On or about December 17, 2015, the domain registration for

1 <AllanMansoor.com> expired. For reasons unknown to Plaintiff, he did not receive  
2 a renewal notice, and the domain expired without his knowledge.

3 14. After <AllanMansoor.com> expired, the domain was acquired by John Doe.  
4 John Doe appropriated Plaintiff's identity by creating a website titled "Allan's  
5 Adult Reviews" and posting as "Allan" to promote pornographic websites on a  
6 website located at a domain comprised exactly of Plaintiff's legal name. Petitioner is  
7 informed and believes that Defendants first published Allan's Adult Reviews on or  
8 about January 30, 2016. A true and correct copy of a screenshot made of the  
9 website is attached as **Exhibit A**.

10 15. While Plaintiff was using <AllanMansoor.com> to archive his prior activities,  
11 he did not check it frequently. He did not realize it had been hijacked until spring  
12 2016 when he prepared to run for Costa Mesa City Council in the November 8,  
13 2016 General Election.

14 16. Plaintiff did not authorize John Doe to use his name in this manner.

15 17. Allan Mansoor is Plaintiff's legal name. He is informed and believes Allan  
16 Mansoor is neither John Doe's legal name nor an alias or nickname John Doe  
17 actually uses. Indeed, Plaintiff is informed and believes that he is the only person  
18 named Allan Mansoor in the country.

19 18. Plaintiff's name is unique because of its history. Mansoor is a derivative of  
20 Mansour, which is Egyptian in origin. When Plaintiff's father immigrated to the  
21 United States from Egypt, he anglicized his name by changing it from Mansour to  
22 Mansoor. There are not many people with the surname "Mansoor" and no other  
23 Allan Mansoors.

24 19. Plaintiff is informed and believes that it is a common practice for people to  
25 register expired domains and use them to display advertising to Internet users  
26 attempting to access the prior website. Persons engaging in this practice generally  
27 repurpose generic content across multiple websites and make money whenever  
28 someone sees or clicks on an advertisement. Plaintiff further believes that these

1 generic marketers select targets based only on the amount of Internet traffic the  
2 websites are likely to receive.

3 20. Plaintiff's circumstances are different.

4 21. The content that Defendants published on <AllanMansoor.com> does not  
5 appear anywhere else on the Internet. Based on this, Plaintiff is informed and  
6 believes that Defendants created content specifically for use on  
7 <AllanMansoor.com>. This includes not only the content but also the branding,  
8 which specifically refers to an individual named Allan who the domain name and  
9 website identify more precisely as Plaintiff Allan Mansoor.

10 22. Each of Plaintiff's political campaigns was contentiously fought, and in more  
11 than 12 years' of holding public office, as well as in his prior career as an Orange  
12 County Sheriff's Deputy, Plaintiff has been outspoken on many controversial  
13 public issues. While Plaintiff has many supporters, he also has many detractors.

14 23. Plaintiff is informed and believes there are many people, known or unknown,  
15 who would like to embarrass him as retribution for his public actions. John Doe and  
16 the other Doe Defendants are among these people and registered the  
17 <AllanMansoor.com> domain name and built "Allan's Adult Reviews" with the  
18 specific intent of disparaging Plaintiff's good name, embarrassing him, and  
19 profiting from the goodwill he has built in more than 12 years' of public service.

20 24. Plaintiff is informed and believes that Defendants are familiar with him and  
21 live in Orange County, California or another nearby California county and/or are  
22 acting as agents of a California resident. This reinforces the allegations above that  
23 Defendants have sufficient minimum contacts with the state of California to subject  
24 them to the personal jurisdiction of this Court.

25 25. Deliberately hijacking Plaintiff's website and using his name to promote  
26 pornography with the specific intent of disparaging Plaintiff's good name,  
27 embarrassing him, and profiting from his goodwill as retaliation for public actions is  
28 despicable conduct Defendants carried out with intent of causing Plaintiff to suffer

1 cruel and unjust hardship. Defendants imposed this hardship on Plaintiff in  
2 conscious disregard of Plaintiff's right to control his uniquely personal domain  
3 name. This demonstrates that Defendants acted with malice and oppression and  
4 subject Defendants to punitive damages.

5  
6 **FIRST CAUSE OF ACTION**  
7 15 U.S.C. § 1125

8 26. Plaintiff incorporates by reference all prior allegations.

9 27. From 2002 through 2015, Plaintiff maintained exclusive use of the  
10 <AllanMansoor.com> domain name. Plaintiff is informed and believes that he is the  
11 only person who has ever owned or operated the <AllanMansoor.com> domain.

12 28. Defendants registered and purchased the <AllanMansoor.com> domain in  
13 early 2016 after its registration inadvertently expired. Plaintiff did not consent to  
14 Defendants' registration of <AllanMansoor.com> or any other domain comprised  
15 of Plaintiff's name.

16 29. The <AllanMansoor.com> domain name consists solely of Plaintiff's legal  
17 name. His name is unique and not shared by anyone else in the country. Defendants  
18 are not named or known by the name Allan Mansoor.

19 30. Plaintiff used the <AllanMansoor.com> domain exclusively to support his  
20 public service on the Costa Mesa City Council and in the State Assembly. He used  
21 his website to communicate with voters and constituents and build and maintain his  
22 public image. In more than 10 years' of public service, Plaintiff became a prominent  
23 local political figure and built an online following of regular website visitors.

24 31. Defendants acted in bad faith by appropriating the <AllanMansoor.com>  
25 domain name to operate a website titled "Allan's Adult Reviews" with the intent  
26 of disparaging Plaintiff's good name, embarrassing him, and profiting from his  
27 goodwill by diverting people from Plaintiff's website.

28 32. The "Allan's Adult Reviews" website includes multiple buttons stating

1 “Join for just \$1 — Click Here!” The buttons link to various pornographic  
 2 websites that are the subject of one of “Allan’s” reviews. Plaintiff is informed and  
 3 believes that Defendants are compensated by the pornographic websites whenever  
 4 someone views the review, clicks the “join” button, and/or joins the pornographic  
 5 website.

6 33. Defendants’ operation of the “Allan’s Adult Reviews” website at  
 7 <AllanMansoor.com> is inconsistent with the public image Plaintiff has built in  
 8 more than 10 years’ of public service. The adult website tarnishes Plaintiff’s  
 9 reputation on the Internet and the goodwill he has fostered in the community at  
 10 large.

11  
 12 **SECOND CAUSE OF ACTION**  
 13 **Misappropriation of Name of Likeness**

14 34. Plaintiff incorporates by reference all prior allegations.

15 35. As of this filing, the Allan’s Adult Reviews website has reviews for four  
 16 pornographic websites. The reviews include “Real Wife Stories,” “Brazzers  
 17 Vault,” “Backroom Facials,” and “Ass Parade.” Each of the four reviews was  
 18 posted by “Allan.” A brief sampling of each review is as follows:

- 19 a. As posted on <AllanMansoor.com>, the “Real Wife Stories” review  
 20 was published at 19:06 on March 16, 2016. It describes “beautiful and  
 21 sultry blondes with big tits and fine asses being the firecrackers that  
 22 they are in bed. The women aren’t just your regular everyday soccer  
 23 moms, in fact, you will be amazed at how young some of these hotties  
 24 look when they go around and cheat on their husbands.” The review  
 25 includes links to “Join for just \$1,” which take website visitors to  
 26 <<http://www.allanmansoor.com/recommends/realwifestories>>,  
 27 which forwards to  
 28 <<http://www.realwifestories.com/tour/?nats=ODEwODI5OjQxMT>>

1 3MQ,0,0,0,0>. Plaintiff is informed and believes that the intermediate  
2 step directing visitors to  
3 <<http://www.allanmansoor.com/recommends/realwifestories>> is a  
4 means for Defendants to track how many Allan's Adult Reviews  
5 visitors click on the join link. Plaintiff is further informed and believes  
6 that “/?nats=ODEwODI5OjQxMT03MQ,0,0,0,0” in the link to  
7 <[www.realwifestories.com](http://www.realwifestories.com)> contains computer code that gives  
8 Defendants credit for any visitors that originate from Allan's Adult  
9 Reviews. A true and correct copy of a printed version of this review is  
10 attached as **Exhibit B**.

11 b. As posted on <[AllanMansoor.com](http://AllanMansoor.com)>, the “Brazzers Vault” review was  
12 published at 23:24 on February 8, 2016. The review states in part that  
13 “They present their movies in high quality format so you don't worry  
14 about viewing substandard porn. The site offers hundreds of porn  
15 videos for your entertainment. This site has all porn movies in it  
16 ranging from MLIFs getting fucked to young babes taking big cocks  
17 without complaining.” It also has a link to “Join for just \$1,” and  
18 includes tracking tools similar to the Real Wife Stories review. A true  
19 and correct copy of a printed version of this review is attached as  
20 **Exhibit C**.

21 c. The “Backroom Facials” review was purportedly posted at 02:30 on  
22 January 30, 2016. It describes “girls who have come for an interview  
23 to enter the adult modeling [sic] thought they knew everything they  
24 need to do, but the reality was far from that. The Backroom Facials'  
25 videos feature newbies who are nervous and unsure about their first  
26 take. They are aware of the fact that they have to undress and pose  
27 nude, but they [sic] have to do sex as well as facials come [sic] as a  
28 complete shock to them.” Like each of the other reviews, this review



1 has a link to “Join for just \$1,” and includes tracking tools similar to  
2 the reviews described above. A true and correct copy of a printed  
3 version of this review is attached as **Exhibit D**.

4 d. The “Ass Parade” review was purportedly posted at 02:11 on January  
5 30, 2016. It describes: “In this parade, you will witness hot butts strip  
6 first and then get down to the action. Each scene has a different name  
7 starring in it, where some are experienced name [sic] whereas some  
8 are amateur. It doesn’t matter whether the butts are an experienced  
9 one [sic] or amateur, it will be spanked and played with before getting  
10 their tight pussies pounded.” Like the others, this review includes a  
11 join link and tracking codes. A true and correct copy of a printed  
12 version of this review is attached as **Exhibit E**.

13 36. Pornography is taboo in our society, and a reasonable person would object to  
14 being associated with pornography in the manner depicted on  
15 <AllanMansoor.com>.

16 37. Defendants’ website, Allan’s Adult Reviews, uses Plaintiff’s name and  
17 likeness, both in its name (“Allan’s Adult Reviews”), Internet location  
18 (<AllanMansoor.com>), and the purported author of the adult reviews (“Allan”).

19 38. Plaintiff neither wrote nor posted the reviews on <AllanMansoor.com>. The  
20 use of his full legal name in the website as well as describing them as posted by  
21 “Allan” on a website located at <AllanMansoor.com> creates the implication that  
22 Plaintiff wrote and/or posted the reviews and/or has authorized the content.

23 39. Plaintiff is informed and believes that Defendants receive compensation  
24 from adult websites whenever visitors to “Allan’s Adult Reviews” view a review;  
25 view or click on the “join now” links found on <AllanMansoor.com>; or join one of  
26 the pornographic websites that is a subject of one of “Allan’s” reviews.

27 40. Defendants are profiting from or attempting to profit from their use of  
28 Plaintiff’s likeness.

1 41. Plaintiff did not authorize the use of his name in this manner.

2 42. When Defendants published the adult reviews on <AllanMansoor.com>,  
3 they did so not only knowing that Plaintiff did not consent to their use of his name  
4 but also with the intent of using the website to retaliate against Plaintiff for his prior  
5 public actions.

6 43. In addition to profiting from Plaintiff's good name, Defendants have caused  
7 Plaintiff to suffer embarrassment, humiliation, shame, mortification, and other  
8 forms of mental and emotional distress.

9  
10 **PRAYER FOR RELIEF**

11 Plaintiff prays that:

- 12 1. The Court grant injunctive relief ordering the transfer of the  
13 <AllanMansoor.com> domain name from Defendants to Plaintiff;  
14 2. The Court award general damages according to proof at trial;  
15 3. The Court award special damages according to proof at trial;  
16 4. The Court award punitive damages according to proof at trial;  
17 5. The Court award statutory damages pursuant to 15 U.S.C. § 1117(d);  
18 6. The Court award Plaintiff his attorneys' fees and costs of suit incurred  
19 herein; and  
20 7. The Court award Plaintiff such other and further relief as the Court may  
21 deem just and proper.

22  
23 **DEMAND FOR JURY TRIAL**

24 Pursuant to Rule 38 of the Federal Rules of Civil Procedure and Local Rule  
25 38-2, Plaintiff demands trial by jury of all triable issues.  
26  
27  
28

1 Dated: February 8, 2017

Respectfully submitted,  
LAW OFFICE OF CHAD D. MORGAN

3 By: /s/

4 \_\_\_\_\_  
CHAD D. MORGAN  
Attorney for Plaintiff, Allan Mansoor