

EXHIBIT A

Complaint

Filing # 111251562 E-Filed 08/04/2020 01:12:52 PM

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY, FLORIDA
CIVIL DIVISION

SNF PROPERTY, LLC
d/b/a Sun N Fun RV Resort
Plaintiff,

Case No.

vs.

DONALD SEOANE A/K/A DONNY
LONG AND NANTITA SEOANE A/K/A
NAN SEOANE A/K/A NANNY KEYS
Defendants

COMPLAINT

Plaintiff, SNF Property LLC d/b/a Sun N Fun RV Resort, including its employees, agents, and representatives (collectively, the "Plaintiff"), by and through the undersigned counsel, hereby sues Defendants, Donald Seoane a/k/a Donny Long and Nantita Seoane a/k/a Nan Seoane a/k/a Nanny Keys (collectively, the "Defendants"), and alleges the following:

JURISDICTION, PARTIES, AND VENUE

1. This is an action for injunctive relief and money damages which exceed \$30,000 exclusive of attorneys' fees, costs, and interest.
2. Plaintiff is a foreign limited liability company authorized to transact business in Florida and the owner of Sun N Fun RV Resort (the "Community"), a recreational vehicle park in Sarasota County.
3. This Court has subject matter jurisdiction pursuant to Fla. Stat. §26.012.
4. Defendants are approved tenants and reside in a recreational vehicle (the "Recreational Vehicle") on a lot located in the Community at 7125 Fruitville Road, Lot No. 1509, Sarasota, Florida 34240 (the "Lot"). See attached RV Placement Agreement as **Exhibit "A"**.

5. Venue is proper as Plaintiff's causes of action accrued in Sarasota County, Florida.

GENERAL ALLEGATIONS

6. Recently, Plaintiff informed the Defendants that their boat could not be parked on the Lot ("Boat Notice"). Specifically, it could not be parked on the grass and the Defendants needed to arrange for alternative storage for their boat.

7. In response to Plaintiff's request, the Defendants maliciously initiated an online smear campaign against the Plaintiff, its employees, agents, and representatives and other tenants within the Plaintiff's Community. Specifically, the Defendants have targeted (i) Sun Communities, Inc. as the parent company of the Plaintiff, (ii) the Community, (iii) Carlo Naimy as assistant property manager of the Community, (iv) Gary Shiffman as President of the Plaintiff's parent corporation, (v) Brian Chase as Plaintiff's counsel and managing attorney of Atlas Law, (vi) Angi Cummins as property manager of the Community, (vii) Helen Kapalowski, as a resident in the Community, and (viii) Debbie Williams, as a resident in the Community. Defendants went so far as to publish photographs of her grandchildren in the defamatory and harassing posts on Facebook.

8. The Defendants have admitted that Defendant Donald created a fake Facebook profile in his wife's name and entitled "Nanny Keys" because Defendant Donald was previously banned from the Facebook platform for similar actions stated herein. Defendant Nantita is believed to have access to the profile and may have contributed to the postings or allowed Defendant Donald to continue using her name and likeness to perpetuate the smear campaign and illegal acts described herein.

9. Defendants created at least two Facebook groups with the specific intent to threaten, cyberstalk, defame, and harass other Community residents and Plaintiff's employees, and harm the Plaintiff's reputation and business.

10. Defendants have threatened to “dot com” the Plaintiff, its employees, agents, and representatives and other tenants within the Community.

11. After said threat, Defendants created the following domains and websites with the specific and malicious intent to threaten, cyberstalk, defame, and harass other Community residents, Plaintiff’s employees, and harm the Plaintiff’s reputation and business. Defendants claimed responsibility for these domains and websites.

- a. <https://www.facebook.com/groups/338979584163621>
- b. <https://www.facebook.com/groups/287971552479855>
- c. <https://www.facebook.com/nanny.keys>
- d. <https://www.suncommunities.news/>
 - i. Including all subdomains. Hosted by Namecheap Inc. and Cloudflare Inc.
- e. <http://carlomichaelnaimy.com/>
 - i. Including all subdomains. Hosted by Namecheap Inc. and Cloudflare Inc.
- f. <https://www.change.org/p/sun-communities-cco-gary-shiffman-fire-carlo-naimy-from-sun-n-fun-sarasota-florida>
- g. <https://pastebin.com/7a41VVGh>
- h. <https://paste.ee/p/WT1dz>
- i. <https://controlc.com/a01ebd40>
- j. <https://archive.is/srsw0>
- k. <https://brianchaseatlaslaw.com>
 - i. Including all subdomains. Hosted by Namecheap Inc. and Cloudflare Inc.

12. In this case, Defendants have specifically stated the following:

- a. “As for threats I don’t make threats I make promises and I’m headed to Facebook and review sites right now...” (signed as “Don and Nan” and sent from nannanyone@gmail.com);
- b. “***We are professional at these online libel games!*** Let the games begin folks let the games begin! Anyone else want to be famous write your name down below cause this shit is about to start flying all over the internet...” (Emphasis added);
- c. “.com’s will be bought and open posting forums and wiki sites with blogs will be built.”
- d. “Sun N Fun is run by pedophiles!” and “Don’t bring your kids here!”
- e. “[Defendant Donald] is a Search engine expert and been doing this all his life!
- f. “We are going to attach online everyone around you and connected to you in any way also!”

- g. "We are sue proof so lets now play internet games and see who wins!"
- h. "Racist pedophile Carlo Naimey"
- i. "Pedophile CEO Gary Shiffnan"
- j. "Money Laundering, Scams, Fraud, Sun Communities, Sun RV Resorts, Sun Communities Exposed"
- k. "He has sexually harassed countless women... He is a bully, stalker and loves to harass and bully people... This petition is to have CEO Gary Shiffnan finally get rid of this little criminal that is his personal bully. Please sign it even if you use an anonymous account... PS Just encase [sic] Gary Shiffnan thinks he is going to have this removed or silence us as he has already tried with his lawyer Brian Chase of Atlis [sic] Law someone has placed it on hundreds of websites all over the net from a computer in Nigeria! Wait till we start not being so nice about these petitions about Gary and others!"
- l. "Carlo Naimey is a racist!" As written on the Defendants' RV windows on the Lot and published to Facebook.
- m. "Dont worry if your on my LIST and you get your .com ill put childrapist.com or some shit after your name or buy you . something else even better. I ALWAYS WIN! You kick the bull you get the horns!"
- n. "If you or your children are in the street, the pool, the playground or in the bathroom you are being watched by pedophiles like manger Carlo Michael Naimey."

See attached sampling of such publications as **Composite Exhibit "B"**.

13. In fact, Defendant Donald went so far as to call the undersigned Plaintiff's counsel, Brian Chase Esq., and threatened to "dot com" him as a "child rapist" simply for representing the Plaintiff and supporting the Boat Notice.

14. Through the date of filing this instant action, Defendants have posted hundreds of similar harassing, scandalous, defamatory, and threatening posts, comments, and other online forum postings defaming and harassing the Plaintiff and continue to do so almost on an hourly basis for the sole purpose to besmirch the reputation, harm, and harass the Plaintiff and the above identified individuals.

15. Defendants have been regularly videotaping and photographing the Plaintiff, its employees, agents, and representatives, and other residents in the Community. *See Caterino v. Torello*, 276 So.3d 88 (2nd DCA 2019).

16. In addition to foregoing electronic and written publications, the Defendants have engaged in increasingly aggressive and confrontational physical acts against the Plaintiff. Such rapid escalation of Defendant Donald's aggressive behavior coupled with his civil and criminal background have severely distressed the Plaintiff's employees, agents, and representatives and other residents in the Community, all of whom are scared, intimidated, and frightful of the explosive and unpredictable nature of Defendant Donald. Other residents in the Community have already expressed their intent to the Plaintiff to move out of the Community solely due to the Defendants actions and online publications, thereby causing damages to the Plaintiff due to lost business and terminations of other landlord-tenant relationships.

17. Accusing the Plaintiff and its employees, agents, and representatives of being rapists, child rapists, racists, perpetrators of sexual assaults, and committing other crimes serves no legitimate purpose other than to smear the Plaintiff's reputation, harm the Plaintiff's business, and harass and defame the Plaintiff, its employees, agents, and representatives.

18. Virtually each post includes a threat that the Defendants will not only continue posting to numerous other websites, but will do so as a part of a "game" to smear and tarnish their reputation and business.

19. Collectively, the foregoing acts described in Paragraphs 7-16 shall be referred herein as the "Prohibited Acts".

20. Defendant Donald has a history of carrying out these threats as recently as two months ago, in May 2020, as evidenced by WIPO Arbitration and Mediation Center Case No. D2020-0683 Administrative Panel Decision whereby Defendant Donald created several scandalous and harassing domains with the specific intent to harm the business and reputation of the complainant. See attached **Exhibit "C"**.

21. A simple google search of Defendant Donald's name reveals countless other eerily similar stories from other victims of Defendant Donald stalking them and publishing harassing publications. It is apparent that Defendant Donald has established a pattern of behavior and course of conduct with virtually anyone who challenges him or attempts to enforce any rules, laws, or contracts against him.

22. To "'harass' means to engage in a course of conduct directed at a specific person which causes substantial emotional distress to that person and serves no legitimate purpose." §784.048(1)(a), Fla.Stat.

23. "'Course of conduct' means a pattern of conduct composed of a series of acts over a period of time, however short, which evidences a continuity of purpose." §784.048(1)(b), Fla.Stat.

24. To "'Cyberstalk' means to engage in a course of conduct to communicate, or to cause to be communicated, words, images, or language by or through the use of electronic mail or electronic communication, directed at a specific person causing substantial emotional distress to that person and serving no legitimate purpose." §784.048(1)(d), Fla.Stat.

25. An injunction is appropriate to protect a victim of cyberstalking. §784.0485(1), Fla.Stat.

26. A bond is not required for the entry of an injunction. §784.0485(2)(b), Fla.Stat.

27. In compliance with §784.0485(3)(b), Fla.Stat., the following is a physical description of each Defendant:

- a. Defendant Donald Seoane: (i) Caucasian Male, (ii) Date of Birth: 02/15/1980, (iii) Height: 5'11", (iv) Weight: approximately 160 lbs, (v) Hair Color: Brown,

(vi) Aliases: Donny Long, Don Seoane, Donald Carlos Seoane, Nanny Keys, and Nanny Nan.

- b. Defendant Nantita Seoane: (i) Asian Female, (ii) Date of Birth: 02/20/1995, (iii) Height: 5'3", (iv) Weight: approximately 130 lbs, (v) Hair Color: Black, (vi) Aliases: Nan Seoane, Nanny Nan, and Nanny Keys.

COUNT I – TEMPORARY INJUNCTIVE RELIEF

28. Plaintiff incorporates and realleges Paragraphs 1-27 as if fully stated herein.

29. This is an action for temporary injunctive relief without written or oral notice to the adverse parties and permanent injunctive relief.

30. Under Florida law, a temporary injunction may be issued upon the Court's consideration of (i) the likelihood of irreparable injury, (ii) the unavailability of an adequate remedy at law, (iii) a substantial likelihood of success on the merits, and (iv) that a temporary injunction will serve the public interest.

31. Injunctions may be based on harassment, defamation, and cyberstalking. See §784.048, Fla.Stat. and §784.0485, Fla.Stat.

32. An injunction may be used to prevent harassment. See *Herskowitz v. Herskowitz*, App. 3 Dist., 281 So.2d 595 (1973).

33. An injunction is a proper remedy to prevent a disgruntled tenant from interfering, via speech, with present or prospective business relationships. See *DeRitis v. AHZ Corp.*, 444 So. 2d 93, 94–95 (Fla. 4th DCA 1984) (stating that certain speech can have catastrophic effect on a business which makes damages estimable by conjecture rather than by any accurate standard); *West Willow Realty Corp v. Taylor*, 23 Misc.2d 867, 198 N.Y.S.2d 196 (Sup.Ct.1960); *Wolf v.*

Gold, 9 A.D.2d 257, 193 N.Y.S.2d 36 (1959); *aff'd*, 18 A.D.2d 987, 238 N.Y.S.2d 473 (1963); *Florida Digestive Health Specialists, LLP v. Colina*, 192 So. 3d 491, 494 (Fla. 2d DCA 2015).

34. Defendants have willfully and maliciously committed the Prohibited Acts to cause substantial emotional distress and severe harm to the business and reputation of the Plaintiff.

35. The Prohibited Acts constitute defamation per se as such extreme and scandalous accusations are demonstrably false (i.e. accusing the Plaintiff, its employees, agents, and representatives, of being racist, rapists, and child rapists). The Defendants knew such accusations were false at the time of such publication or publishing such accusations with reckless disregard for the falsity of the same.

36. Defendants' Prohibited Acts serve no legitimate purpose other than to harass, defame, and cyberstalk the Plaintiff.

37. Defendants' continuation of the Prohibited Acts and promises to worsen the same are credible threats based on the recent adjudication of Defendant Donald conducting similar Prohibited Acts.

38. Plaintiff is certain to suffer irreparable harm if the Defendants' Prohibited Acts are allowed to continue. This verified complaint demonstrates that immediate and irreparable injury, loss, and/or damage with result to the Plaintiff (on behalf of its employees, agents, representatives, and other residents) before the Defendants may be heard in opposition.

39. The undersigned attorney certifies that efforts have been made to give notice to the Defendants to cease its Prohibited Acts. However, the Defendants have refused to cease such actions. Notice and hearing should not be required before issuance of the temporary injunction, as this interim measure is necessary to mitigate Plaintiff's damages, its business, its reputation, stop the spread of false accusations against the Plaintiff, and prevent the Defendants from creating

websites misappropriating and infringing on the Plaintiff's (including on behalf of its employees, agents, representatives, and other residents) name, image, likeness, and intellectual property.

40. Plaintiff is substantially likely to succeed on the merits of this action and an injunction will serve the public interest.

41. If this Court desires, an injunction can be narrowly tailored to mitigate the Plaintiff's damages and prevent the Defendant from continuing its Prohibited Acts.

WHEREFORE, the Plaintiff respectfully requests this Court to (i) issue a temporary injunction without notice pursuant to Rule 1.610(a)(1), *Fla.R.Civ.P.*, to cease and desist from committing the foregoing Prohibited Acts, (ii) issue a permanent injunction against the Defendants to prevent further Prohibited Acts, (iii) Order each respective domain host provider to temporarily suspend the foregoing domains, subdomains, and websites, (iv) order the Defendants to remove and retract all electronic and written publications published online or elsewhere, and (v) such other relief this Court deems just and proper.

COUNT II – TORTIOUS INTERFERENCE

42. Plaintiff incorporates and realleges Paragraphs 1-27 as if fully stated herein.

43. This is an action for tortious interference with business and contractual relationships.

44. The elements of tortious interference with business relationships are: (i) the existence of a business relationship, (ii) defendant's knowledge of the relationship, (iii) defendant's intentional and unjustified interference with the relationship, and (iv) resultant damages.

45. The elements of tortious interference with contractual relationships are: (i) the existence of a contractual relationship, (ii) defendant's knowledge of the relationship, (iii)

defendant's intentional and unjustified procurement of the contract's breach, and (iv) resultant damages.

46. At all relevant times, Plaintiff maintained business and/or contractual relationships with its other tenants within the Community through leases, RV Placement Agreements, or oral tenancy agreements.

47. Defendants had knowledge of said business and/or contractual relationships between the Plaintiff and its tenants.

48. Defendants' Prohibited Acts are clearly designed to interfere with the Plaintiff's business and contractual relationships with its tenants. On their face, all of Plaintiff's publications are targeted at current and prospective tenants of the Plaintiff's Community with the clear intent to sever existing relationships and deter prospective tenants.

49. Defendants' Prohibited Acts are intentional and unjustified in nature as they serve no legitimate purpose other than to harass and defame the Plaintiff and cause the Plaintiff monetary and reputational harm.

50. As a result of the foregoing, Plaintiff has suffered damages.

WHEREFORE, Plaintiff requests that this Court enter judgment against the Defendants for actual and consequential damages, special damages, attorney's fees and costs, and other relief as this Court deems just and proper.

COUNT III – DEFAMATION

51. Plaintiff incorporates and realleges Paragraphs 1-27 as if fully stated herein.

52. Under Florida law, Defamation has five elements: (i) publication, (ii) falsity, (iii) the statement was made with knowledge or negligently, (iv) actual damages, and (v) a defamatory statement defamatory.

53. Demonstratively false factual allegations are not protected under the First Amendment. *Blake v. Ann-Marie Giustibelli, P.A.*, 182 So.3d 881 (Fla. 4th DCA 2016).

54. “[A]n action for libel will lie for a ‘false and unprivileged publication by letter, or otherwise, which exposes a person to distrust, hatred, contempt, ridicule or obloquy or which causes such person to be avoided, or which has a tendency to injure such person in [their] office, occupation, business or employment.’” *LRX, Inc. v. Horizon Assoc. Joint Venture ex rel. Horizon-ANF, Inc.*, 842 So.2d 881, 885 (Fla. 4th DCA 2003) (quoting *Thomas v. Jacksonville Television, Inc.*, 699 So.2d 800, 803 (Fla. 1st DCA 1997)); See also *Blake v. Ann-Marie Giustibelli, P.A.*, 182 So.3d 881 (Fla. 4th DCA 2016).

55. “[A] publication is libelous per se, or actionable per se, if, when considered alone without innuendo: (1) it charges that a person has committed an infamous crime; (2) it charges a person with having an infectious disease; (3) it tends to subject one to hatred, distrust, ridicule, contempt, or disgrace; or (4) it tends to injure one in his trade or profession.” *Richard v. Gray*, 62 So.2d 597, 598 (Fla.1953); see also *Shafran v. Parrish*, 787 So.2d 177, 179 (Fla. 2d DCA 2001) (“When a statement charges a person with committing a crime, the statement is considered defamatory per se.” (citation omitted)). See also *Blake v. Ann-Marie Giustibelli, P.A.*, 182 So.3d 881 (Fla. 4th DCA 2016). See *Lawnwood Med. Ctr., Inc. v. Sadow*, 43 So.3d 710, 727–29 (Fla. 4th DCA 2010) (containing discussion of the presumption of damages that applies in defamation per se cases); *Perry v. Cosgrove*, 464 So.2d 664, 666 (Fla. 2d DCA 1985); *Owner's Adjustment Bureau, Inc. v. Ott*, 402 So.2d 466, 470 (Fla. 3d DCA 1981) (concluding that statements in a letter amounted to libel per se as a matter of law).

56. As evidenced by the Prohibited Acts, Defendants have defamed the Plaintiff by publishing false statements about the Plaintiff, its employees, agents, and representatives to third parties.

57. Defendants knew such statements were false or were made negligently or with reckless disregard for the truth of such statements.

58. In fact, Defendants' statements are defamation per se as they are demonstrably false and scandalous in nature. Further, they accuse the Plaintiff of committing infamous crimes, subject the Plaintiff to hatred, distrust, ridicule, contempt, and disgrace, and injure the Plaintiff's reputation and business.

59. As a result of the foregoing, Plaintiff has suffered damages.

WHEREFORE, Plaintiff requests that this Court enter judgment against the Defendants for actual and consequential damages, special damages, attorney's fees and costs, and other relief as this Court deems just and proper.

VERIFICATION

I, Angela Cummins, declare under penalty of perjury that I have read the foregoing Complaint, and the facts alleged therein are true and correct to the best of my knowledge and belief.

SNF PROPERTY, LLC

By: Angela Cummins

Its: General Manager

Dated: 8/4/20

Respectfully Submitted,

ATLAS LAW

/s/ Jessica Skoglund Mazariego

Brian C. Chase, Esq.

Florida Bar # 0017520

Jessica Skoglund Mazariego, Esq.

Florida Bar # 1003893

3902 N. Marguerite Street

Tampa, Florida 33603

Phone: 813.241.8269

Fax: 813.840.3773

Attorneys for Plaintiff

Primary: efiling@atlaslaw.com

Secondary: jsm@atlaslaw.com

EXHIBIT “A”

NONASSUMABLE ADDENDUM TO
RV PLACEMENT AGREEMENT - MULTIPLE YEAR COMMITMENT

ADDENDUM TO RV PLACEMENT AGREEMENT dated the 1 day of May, 2019
between Sun N Fun RV Resort as "MANAGEMENT", and Donald Carlos Sevane & Nantita
as "RESIDENT" occupying site number 1509 Sevane

Check one: Permanent Annual Rolling Annual

RESIDENT shall be entitled to an incentive package valued at \$ 1200, and must remain an occupant of
site 1509 for a period of no less than 2 consecutive years beginning this 1 day of May, 2019, and
ending April 30, 2020

Incentive Package Description: Elite Site

RESIDENT shall be entitled to this incentive package provided RESIDENT is not in default of the terms of the
RV Placement Agreement and this Addendum to the RV Placement Agreement. A default shall exist if the
RESIDENT fails to abide by the RV Rules and Regulations, fails to make timely rental payments as specified in
the RV Placement Agreement, or vacates this site prior to the date listed as above in this Addendum to the RV
Placement Agreement. In the event of default, RESIDENT shall be subject to payback a pro-rated portion of
the amount listed above, based upon the date in which default occurs. Any rent incentives are non-transferable.

All other terms and conditions of the RV Placement Agreement shall remain in full force and effect.

ACCEPTED AND APPROVED BY:

Nantita
RESIDENT

Donald
RESIDENT

5/23/19
Date

AGENT FOR MANAGEMENT:

James
RV Resort Manager

5/23/19
Date

Attach this legal document to the RV Placement Agreement

ANNUAL NONASSUMABLE ADDENDUM TO
RV PLACEMENT AGREEMENT - DISCOUNTED RENT

ADDENDUM TO RV PLACEMENT AGREEMENT dated the 1 day of May 2019

2018 between Sun N Fun RV Resort as "MANAGEMENT", and

Donald & Nantita, as "RESIDENT" occupying site number 1509
Seoane

Check one: Permanent Annual Rolling Annual

	Per Month
Current Site Rent (permanent or rolling)	\$ <u>813</u>
Less: Rent Discount	\$(<u>100</u>)
Discounted Site Rent	\$ <u>0713**</u>

Plus: Other Charges and Fees listed in the RV Placement Agreement

** Check one:

Discounted site rent WILL increase each year on the 1st day of September
(Month)

Discounted site rent WILL NOT increase each year on the 1st day of _____
(Month)

The Rent Discount will expire on May 1 2020 and RESIDENT site rent will be adjusted to the prevailing market rent on that date subject to future increases on the 1st day of September
(Month)

RESIDENT shall be entitled to the rent discount provided RESIDENT is not in default of the terms of the RV Placement Agreement. A default shall exist if the RESIDENT fails to abide by the RV Rules and Regulations, or fails to make timely rental payments as specified in the RV Placement Agreement. In the event of default, RESIDENT shall immediately forfeit his/her/their right to the rent discount.

All other terms and conditions of the RV Placement Agreement shall remain in full force and effect.

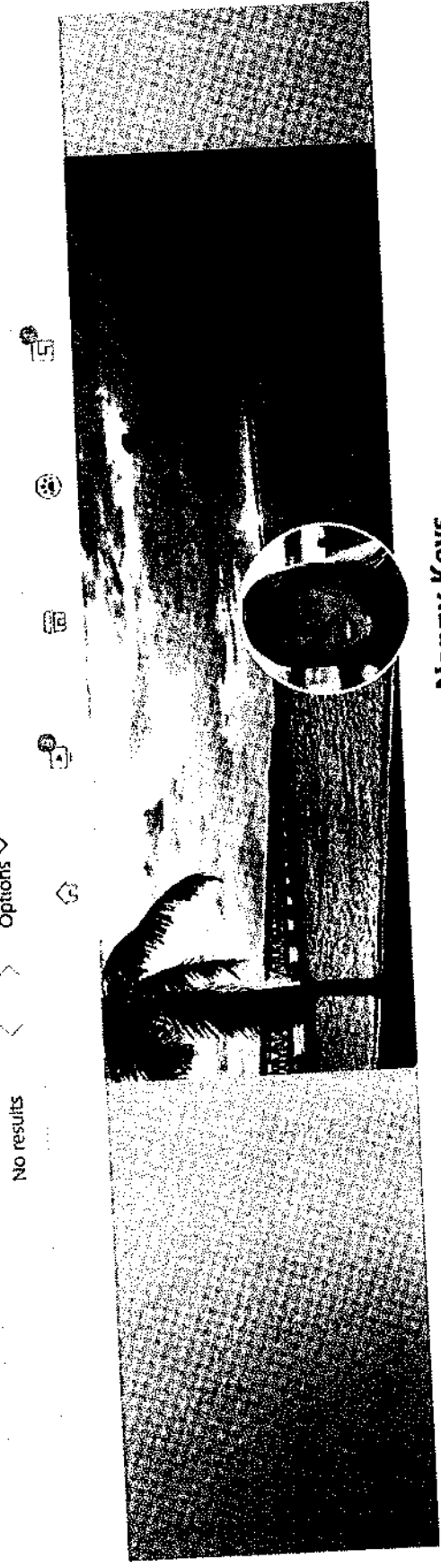
ACCEPTED AND APPROVED BY:

Nantita
RESIDENT
Donald
RESIDENT
5/23/19
Date

AGENT FOR MANAGEMENT:
[Signature]
RV Resort Manager
5/23/19
Date

Attach this legal document to the RV Placement Agreement

EXHIBIT “B”



No results < > Options

Nanny Keys

Just here enjoying life looking to make friends.

- Timeline
- About
- Friends
- Photos
- Videos
- Check-ins
- More
- Add Friend
- Search

Do you know Nanny?

To see what she shares with friends, send her a friend request.

Nanny Keys updated her cover photo.
April 16, 2019



Share

Intro

Went to Coral Shores High School



TRUTH of the Bubble - SNE Sarasota FL - Community Forum

TRUTH of the Bubble - SNE Sarasota FL - Community Forum & Classifieds

Public Home End Friends Create

Recent group photos

Nancy Kista shared a link

Lesson for home owners here is that if you buy a property in Sun N Fun Sarasota Florida its just a matter of time before you get bullied out and lose your home by a eviction notice from Rusdit scum bullies like Calio Michael Naimay

carltonchaelnaimay.com
carltonchaelnaimay.com is going to be the lunest site for Sun N Fun Sun Communities and his boyfriends Jeffrey Shuffman are gay child rapist pedophile scum. Lets get started that will this is one domain of many to...

Seen by 9

Like Share

Search this group











Nanny Keys

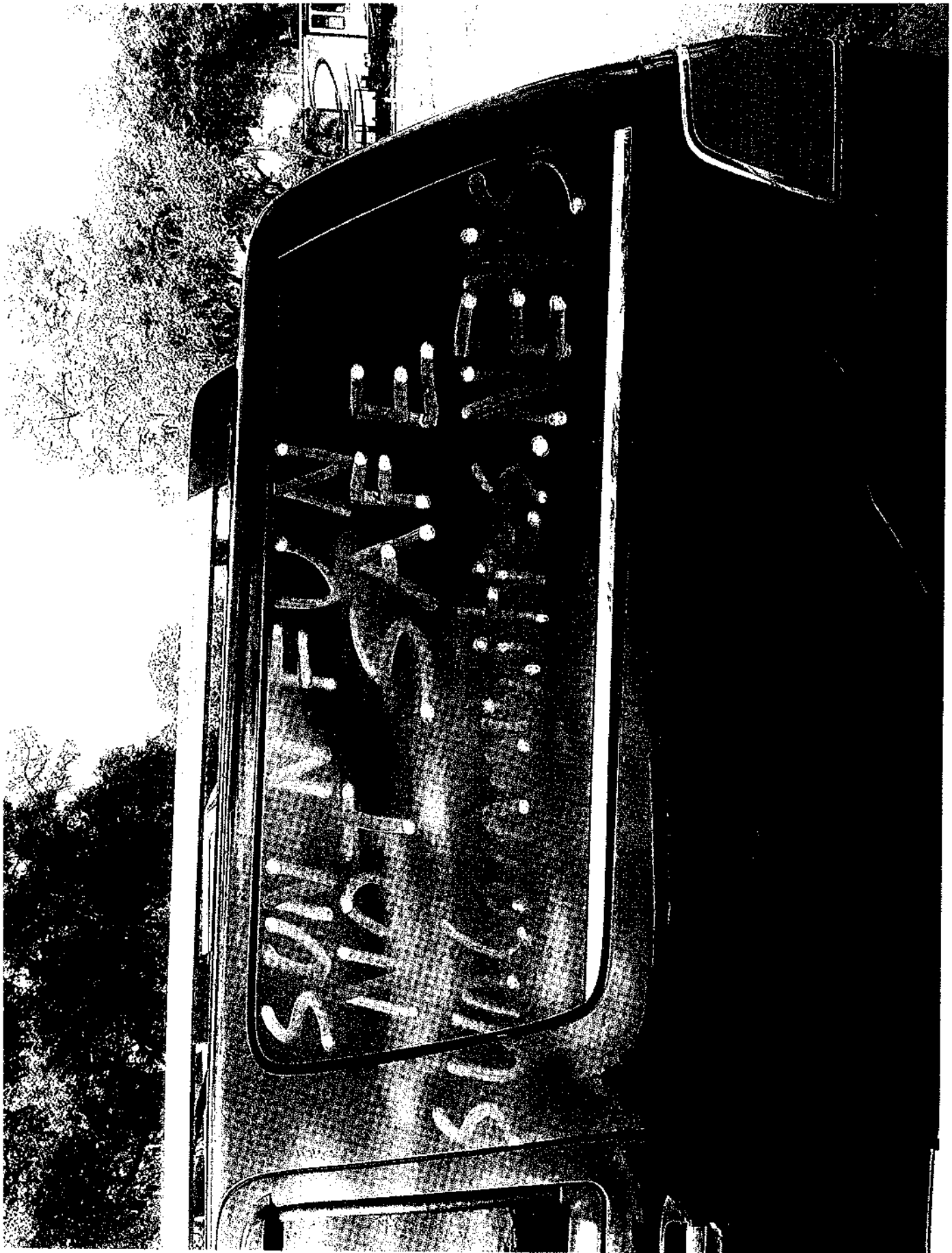
Like Share

Facebook - Microsoft Edge

Type here to search

7:05 PM 8/2/2020





TRUTH of the Bubble - SNF Sarasota FL - Community Forum & Classifieds

Public group

About

Discussion

Members

Events

Videos

Photos

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Shortcuts

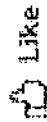
In The Bubble - Su... 20+

+ Join Group

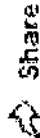
More

Join this group to post and comment

1 Comment Seen by 38



Like



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Nanny Keys What kind of lawyer cant afford a dentist?

Like · 15h

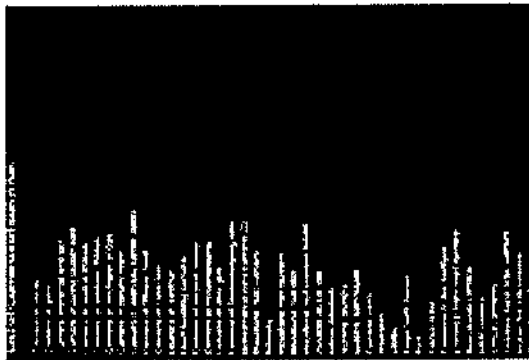
PC PG DE



Nanny Keys shared a link.

22h

Carlo Naimey Sun N Fun Sarasota Manager leaking peoples personal private info UPDATED!



SUNCOMMUNITIES.NEWS

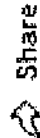
Carlo Naimey Sun N Fun Sarasota Manager leaking peoples personal private info UPDATED! – Sun Communities News

Carlo Naimey Sun N Fun Sarasota Manager leaking peoples personal private info UPDATED! sun communities news suncommunities August 3, 2020 August 3, 2020 So earlier this was posted on

PC PG DE



Like



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TRUTH of the Bubble - SNF Sarasota FL - Community Forum & Classifieds

Public group

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About

Seen by 35

Discussion

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Members

Events



Nanny Keys

14h

...

Private
Codia
Facet

Videos

Who is the man in the Orange shirt at Sun N Fun Sarasota Florida?
<https://www.suncommunities.news/who-is-the-man-in-the-oran.../>

Photos

Search this group



Shortcuts

In The Bubble - Su... 20%



Seen by 33

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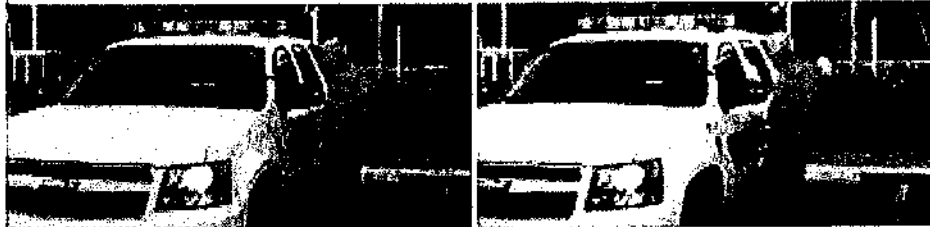
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Shortcuts

In The Bubble - Su... 20%

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More Join this group to post and comment



Seen by 33

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- English
- Portuguese
- Deutsch
- Private
- Cook
- Facebook



Nanny Keys

14h

...

Here is part 2 of the video from Sun N Fun Sarasota thats full of racist criminal pedophiles slaking me and my wife and 3 kids. Listen and watch and pm me here or anonymously post about it on <https://www.suncommunities.news/anonymous-submit-to-front-.../>



Seen by 18

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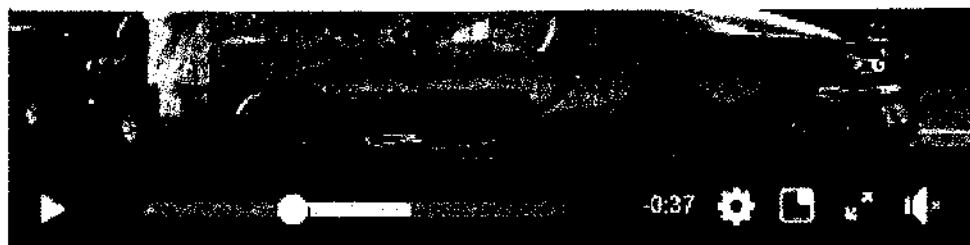
Search this group

Shortcuts

In The Bubble - Su... 201

+ Join Group

More Join this group to post and comment



Seen by 18

Like

Share



Nanny Keys

14h

VIDEO: So after getting bullied stalked and harassed by the racist scum at Sun N Fun in Sarasota Florida all day today we got served a lawsuit which is toilet paper to us and then another eviction warning to get out today AHHAHAHA MAKE US! Then we see this flashy wannabe cheap version of a super car sitting at front of office illegally parked. Sure looks like a lawyer or company executives car dont it folks? He claimed to be a renfer AHHAHAHA Yea ooooooohhhhh. Anyone know who he is? We even had the cops come to make sure we were in our legal rights and we were. Everything we are doing is civil and protected under news reporting laws and more. SUE AWAY RACIST AND CALL THE COPS ALL YOU WANT BUT IT WONT STOP OR OR WORK! PM me if you know who this guy is. He came out with a women and then drove off in another video I have!



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News

Lesson for failed racist lawyer Brian Chase Atlas...

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OLDER



Nanny Keys shared a link.

13h

This was the website on that BMW parked in front today
<https://cleanairadventures.com/> anyone know who he is or what he was doing talking to the racist pedophiles in the offices of Sun N Fun Sarasota Florida?



CLEANAIRADVENTURES.COM

Time to get outside and play!

We are a group of friends and business partners who are well-versed in...

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Nanny Keys
1d

...

When the racist at Sun N Fun Sarasota Florida and Sun Communities wake up in the morning and check the internet!

PS. Now im getting others from other parks across the country contacting me including employees of other parks. Im going to setup a email and hotline phone number for the website and that website is going to go viral! HAHAAHAAHA



Seen by 33

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Nanny Keys
1d

...

Henry foster is going to have some interesting stuff posted about him on the internet ehehehehe. OH WAIT! Where did I get that name? You all have no fucking clue who you are messing with you racist piece of trash! Did I mention I not even got started yet? Oh yea!

Seen by 33

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Nanny Keys
1d

...

Does anyone know the CEO of Sun Communities Gary A Shiffman riddle name? It middle initial is A. Going to have some fun with this clown online for sure! He has rattle the bees nest hehehehehe.

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Nanny Keys
1d

...

Got over 800 email addresses belonging to everyone that lives in the park with all there info attached as well right from the office and Carlo. I'm Going to log off and get some stuff done and not sure when ill be back but for the record Sun Communities, Gary Shiffman and there lawyer are doing NOTHING to make things right with us and just want to keep being racist scumbags and kick the bull even after all they done to us. This is what you call a bully folks! Problem is they tried to bully a BULL! Now they will get the horns! There is a long road ahead! Did I mention I not even got started yet? Gary check reviews sites with your name! HAHAAHAHAHA

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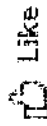
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Seen by 24



Nanny Keys
1d

...

The websites have not hit google yet but not to worry folks they have been submitted for google spider crawl and will be indexed in google search soon. Remember once on google forever on the internet! Did I mention I not even got started yet? OHT YA!



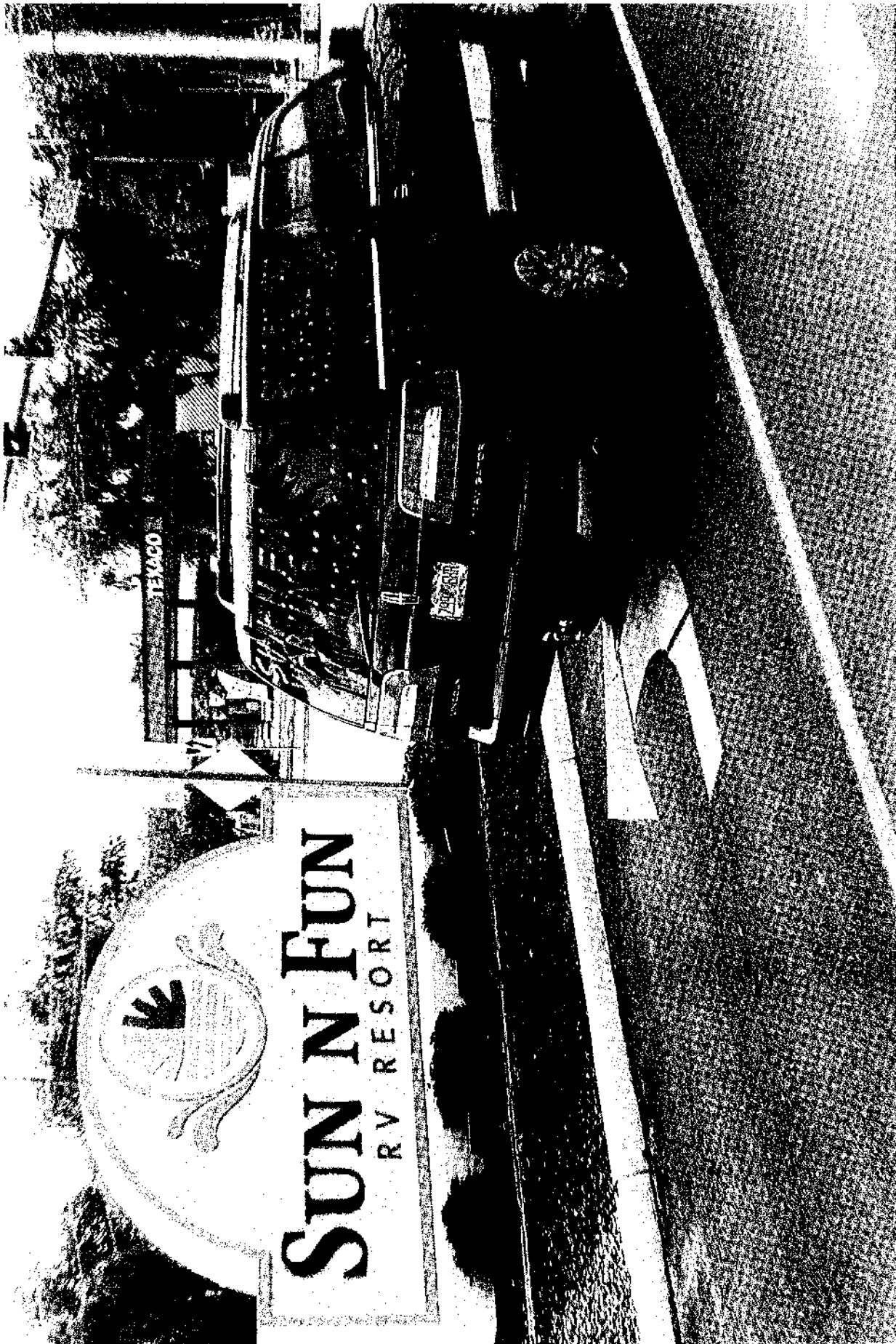
Like

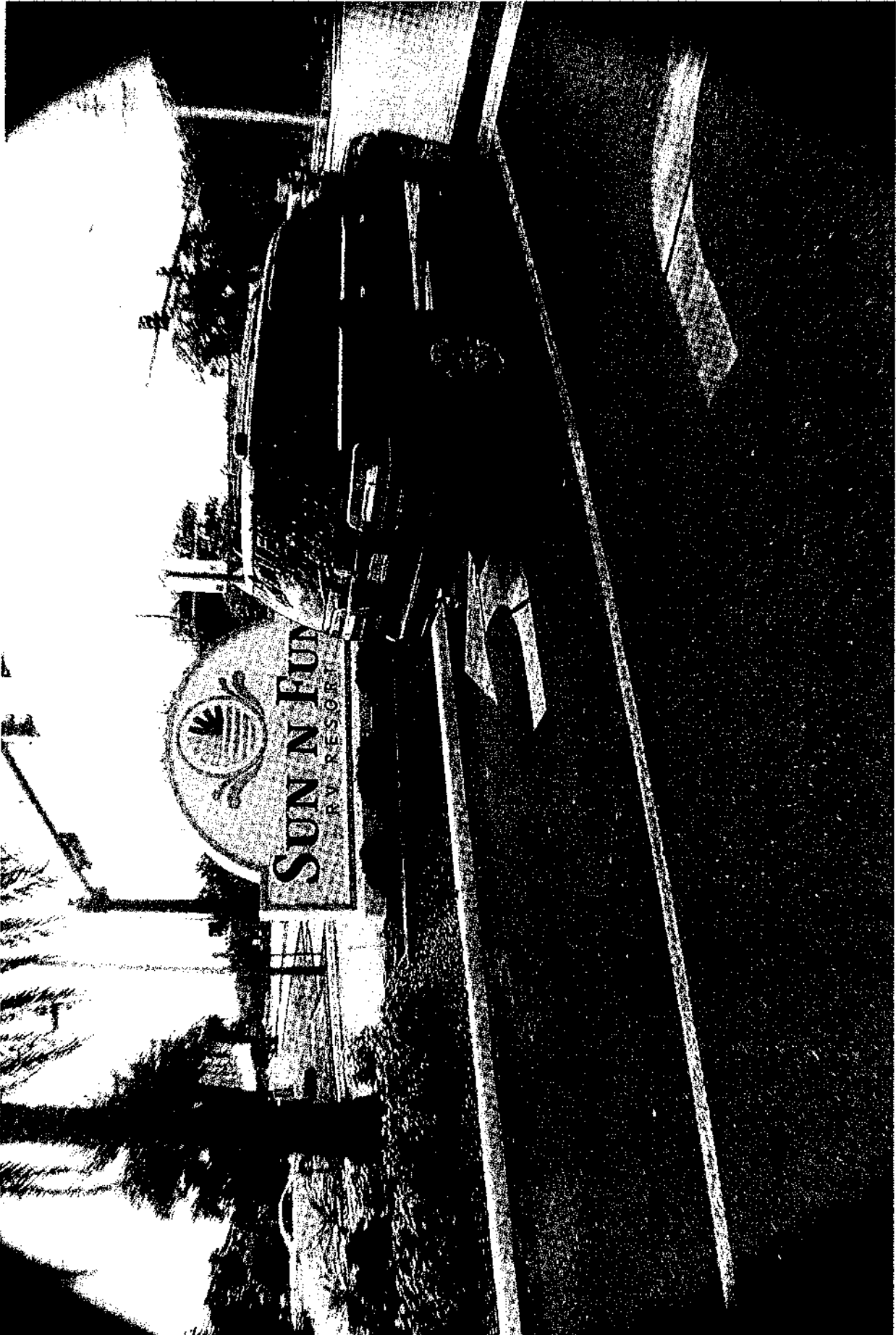


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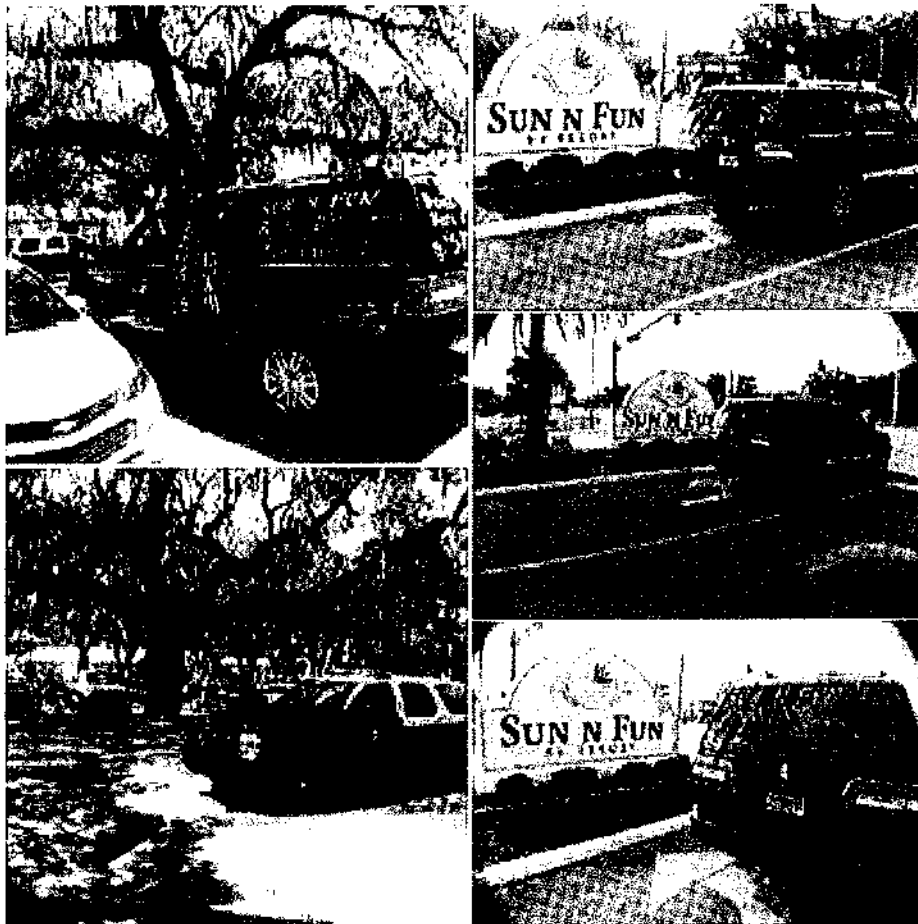
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Nanny Keys

13h

Some shots from our weekend of fun at Sun N Fun exposing the pedophiles and racist with our personal police escorts paid for by Sun N Fun HAHAHAHAHHA! Got some great shots for the website by the Sun N Fun sign! We going to do many more photo and video shoots all around the park all week and get tons more racist on camera that run this shithole so stay tuned for more.



Seen by 35

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SUN COMMUNITIES NEWS

Who is the man in the Orange shirt at Sun N Fun Sarasota Florida?

By suncommunities

Sun N Fun drama, sun n fun events, Sun N Fun Sarasota Florida, Sun N Fun things to do, Sun N Fun truth



Since the manager Carlo Michael Naimy lost his nut sack and cant find it and has been hiding inside the office from being confronted on camera for several days now while pissing on himself and calling cops 5 times a day crying only to end up making a fool of himself. We have been exposing not only his racist ass but tons of other racist pedophile scumbags that work at and run Sun N Fun Sarasota Florida.

This guy in the orange shirt came out today when we were confronting someone with our video camera we think to be from corporate or a lawyer. Post in the comments below if you know who it is?

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Since the manager Carlo Michael Naimy lost his nut sack and cant find it and has been hiding inside the office from being confronted on camera for several days now while pissing on himself and calling cops 5 times a day crying only to end up making a fool of himself. We have been exposing not only his racist ass but tons of other racist pedophile scumbags that work at and run Sun N Fun Sarasota Florida.

This guy in the orange shirt came out today when we were confronting someone with our video camera we think to be from corporate or a lawyer. Post in the comments below if you know who it is?



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Tue, Aug 4th, 2020 7:25:23 PM

Sun Communities News

Sun Communities News

HOME ANONYMOUS SUBMIT TO FRONT PAGE

ANDY CUMMINGS

CARY A. SUSTMAN

CARLO MALKEY

BRIAN CHASE ATLAS LAW

SUN N FUN

SUN N FUN

Sun N FUN not so fun or safe! If you are at Sun N Fun in Sarasota Florida owned by pedophile CEO Ben Schiffman then you and your personal info are not safe. This man is a criminal piece of shit! The employees at the park are racist and pedophiles. If you have children do not bring them here or to the pool. You will notice the employees pawing at your kids not only at the pool but also at the playground and other places. There are over 30 hidden cameras around the park including in the bathrooms from time to time and this is not a safe place for anyone. More to come!

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Carlo Malkey Sun N Fun Sarasota Manager taking peoples personal private info UPDATED!

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August 2020

Navigation bar with icons for home, search, and other site functions. Includes a timestamp: 7:25 PM 8/4/2020.

Angi Cummins

Angi Cummins is the newest manager at Sun N Fun RV resort in Sarasota Florida that has made a name for herself being a bully and a racist. She is called dumb by other employees of the park that have to work with her and they say she has her head up her butt.
She is a super attention whore that likes to let her fat cottage cheese ass hang out of her low cut shorts when she is not working and it grosses people out. MUCH more to come VERY soon!



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HOME ANONYMOUS SUBMIT TO FRONT PAGE ANONYMOUS FORUM GARY A SHIERMAN CARLO NAIMY BRIAN CHASE ALIAS LAW ANCI COMMUNIS SUN N FUN

Carlo Naimy

Carlo Naimy is the assistant manager at the Sun Communities property called Sun N Fun in Sarasota Florida. Carlo is a women beating stalker and a racist pedophile. If you are thinking of staying at Sun N Fun think again as its not safe with this man and the other racist management. He is the boyfriend and right hand man for Pedophile Gary Shierman and has been to the famous pedophile island with him before Jeffrey Epstein died.



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Gary A Shiffman

Gary A Shiffman is a famous rich pedophile pay child rapist that owns, runs and is the CEO of Sun Communities. He is one of many that were exposed going to the famous pedophile island of Jeffrey Epstein! Much more to come soon!



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Carlo Michael Naimy is from Rhode Island and has a degree in criminology and used to be in loss prevention. He is a part stroller and property manager for Sun Communities.

He is a convicted pedophile that is wanted offshore for raping young children. He has been called out at the pool at Sun N Fun in Sarasota Florida watching young boys twirling hula hoops at the pool in front of DJs when they have kids events or sometimes you will see him gawking at children at the playground in Sun N Fun!

Sun N Fun is not a safe place for your children or for anyone for that matter!

carlomichaelnaimy.com is going to be the funnest site for Sun N Fun! Sun Communities and his boyfriend Jeffrey Sluffman are gay child rapist pedophile scum. Lets get started shall we! This is one domain of many to come. Im installing site software so stand by folks! Keep checking back and refresh the page.

Dont worry Carlo we are coping each page to hundreds of sites that will take over google soon for your name!

We are also getting a ton of people email in about Carlo! Wait till we start posting the stories.



Carlo Michael Naimey Carlo Michael Naimey

carlo.michael.naimey.info

CARLO MICHAEL NAIMÉY

Carlo Michael Naimey

By carlomichaelnaimey August 2, 2020 1 Comment



Carlo Michael Naimey is from Rhode Island and has a degree in criminology and used to be in loss prevention. He is a paid stalker and property manager for Sun County, Arizona.

He is a convicted pedophile that is wanted offshore for raping young children. He has been called out at the pool at Sun N Fun in Sarasota Florida watching young boys twirling hula hoops at the pool in front of DJs when they have kids events or sometimes you will see him grabbing at children at the playground in Sun N Fun!

Sun N Fun is not a safe place for your children or for anyone for that matter

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ANN TAYLOR
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Hot looks for hot days.

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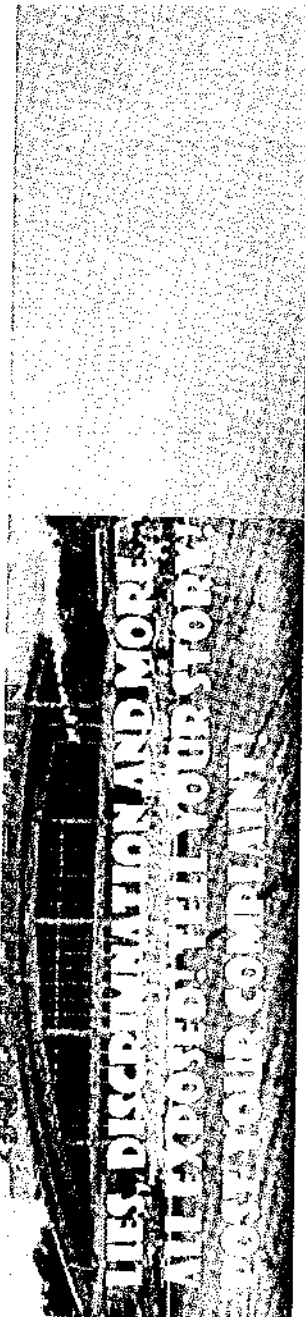
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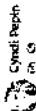


TRUTH of the Bubble - SNF
Sarasota FL - Community Forum
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Cynedi Repph
 1h · 0

Sorry, I'm not reading all your post I guess I'm lost as to what started the whole issue with the report. However did it ever occur to you that your nails are very off putting. Let's start with you asking people to post that have an issue. I would be afraid to post on this page nor because of fear of sun in tan but fear of you. You jump and just seem to have uncontrollably. I'm Latino I go there every year I love it the staff the people. I've never had an issue. Just the opposite the office has gone out of its way to help us. My Latino dia visits daily and is treated very well. Any issue I have had with them has zero to do with race. It has to do with everyone. Politics plays more into the issues they have there not race. I think you might be heard and maybe understood if you were to simply state the issue minus calling people names, making very unfounded statements. Just blaming things on your race is like using the me to movement to get ahead. Or make a person lose everything. I wish I did understand what started all this. At this point your rant seem a bit crazy and lack any substance.

7 Comments · Seen by 27

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Mame Kay
 I am sorry you don't know the whole story but its a long one with MANY situations that have accrued with the state and those that have to deal with it. I'm sorry you don't know the whole story but its a long one with MANY situations that have accrued with the state and those that have to deal with it.

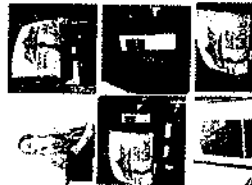
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Description: Lesson for home owners here is that if you buy a property in Sun N Fun Sarasota Florida
Submitted on August 1, 2020 at 10:57 PM

LESSON FOR HOME OWNERS HERE IS THAT IF YOU BUY A PROPERTY IN SUN N FUN (Text)

- 1 Lesson for home owners here is that if you buy a property in Sun n Fun Sarasota Florida its just a matter of time before you get billed out and lose your l
- 2 carlojshan@outlook.com
- 3 carlojshan@outlook.com
- 4 carlojshan@outlook.com is going to be the funnest site for Sun n Fun! Sun Communities and his boyfriend Jeffrey Shiffman are pay child support pedophile scur
- 5 carlojshan@outlook.com is going to be the funnest site for Sun n Fun! Sun Communities and his boyfriend Jeffrey Shiffman are pay child support pedophile scur

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Nancy Keys shared a link

So little trailer racist pedophile bully Carlo Michael Naimey http://carlomichaelnaimey.com/ has a degree in criminology and used to be in loss prevention. He's from Rhode Island but he called the police on us 5 times yesterday for a civil matter waiting the police time and made a fool of himself pissing off the police and now spent Sun Communities money hiring a full time police to protect him at the gate because he is a sissy coward scared of confrontation with our camera and the police now really are protecting us more than him to further our message at the gate on our truck and around the park and given us paid protection! As for loss prevention I direct you to the shit storm of a shit hurricane he has caused for the company and everyone evicted at https://suncommunities.com/news/

Don't worry folks, each of these posts are being copied to hundreds of sites across the net and will NEVER EVER be able to be removed from google or duckduckgo or others. Just to show you a few of the hundreds of pages it goes to most of which are not even in the USA and ignore legal threats and you can never get it down are:

- https://zenonix.com/yeez3756/
https://state.net/7340C
https://pantebin.com/52D3NEr

Now those are Facebook post shahhaa!

All my facebook post are now being spread far and wide and saved. Check the public IP of the poster list in Burundi, Bujumbura AHAAHAHAHAHAHA!

Whats great is someone with a google footprint as bad as he is growing to get Sun Communities wont be able to have working for them long and once he is fired nobody else will hire him!

He pissed off the police so bad yesterday that one officer recommended that we "out the racist all over social media". Not to worry folks there are plenty of other tricks in my hat including others sites such as Twitter, Youtube and MANY more! Tons of free speech video sites and more than ignore legal threats. Now I ask everyone to please go to your kitchen and get your popcorn ready and pull up a chair. I got SEO and webmaster fun to take care of LOL.

CARLOMICHAELNAIMEY.COM
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Sent by K6

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Nanny Keys 53m · 0

While more software is loading on servers in Africa I wanted to say this. Ok for those that didnt know now starts the shit storm online for the next several hours so get your popcorn. Park by day and internet by night! LOL Man these racist scum are getting covered in some stinky shit aren't they? Wait till we get on the local news and finally do get thrown out and video it. Then its game on folks! Right now we just having a little fun for a laugh! HAHAAH-AHAHAHAHAHAHA

This shit is like a video game where I always win cause I got all the cheat codes. By the way for those that thought we didnt know you were talking shit, we have other profiles and friends inside other groups sending us every post and screenshots and more so keep running your mouths and you all will also be outed on the site being built you racist scumbags. I got a list of about 20 friends now inside the park that are sending us shit and giving us dirt on all of you. One drunk just doesnt seem to know when to STFU does she alahahaha. The company and management have a long history and a ton of dirt on them we are collecting up abou. Its all being sent to us and told to us dont worry! Payback online is coming for everyone that has asked for it! Ok back to building a mega site online BRB. Till next post be back soon!

Seen by 16

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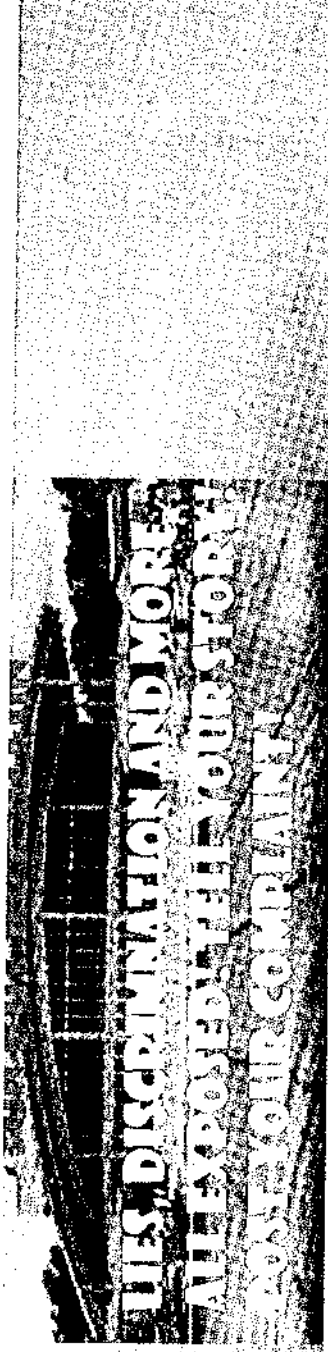
So little stalker racist pedophile bully Carls Michael Naimoy http://californiaincubator.com/ has a degree in criminology and used to be in loss prevention. He's from Rhode Island but he called the police on us 2 times yesterday for a civil matter wasting the police time and made a fool of himself pissing off the police and now spent Sun Communes money hiring a full time police to protect him at the gate because he is a sissy coward scared of confrontation with our camera and the police now really are protecting us more than him to further our message at the gate on our truck and around the park and given us paid protection! As for loss prevention I direct you to the shit storm of a shit hurricane he has caused for the company and everyone

https://facebook.com/f.php?u=https://s3.amazonaws.com/... since across the net and will NEVER EVER be able to be removed from google or facebook or others. Just to show you a few of the hundreds of pages it goes to most of which are not even in the USA and ignore legal threats and you can never get it down ever.

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New Activity

Nanny Keys shared a link

6 people have signed to have Carlo Michael Naimemy from Sun N Fun in Sarasota Florida FIRED for his long history of bullying, harassing and being racist. We need more to sign it! Even if you do it anonymous it helps! <https://www.change.org/p/racism-communities-anti-gay-stifman-lie-carlo-naimemy-from-sun-n-fun-sarasota-florida>

CHANGEC.Org

Sign the Petition Fire Carlo Naimemy from Sun N Fun Sarasota Florida

Seen by 6

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Nanny Keys



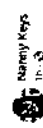
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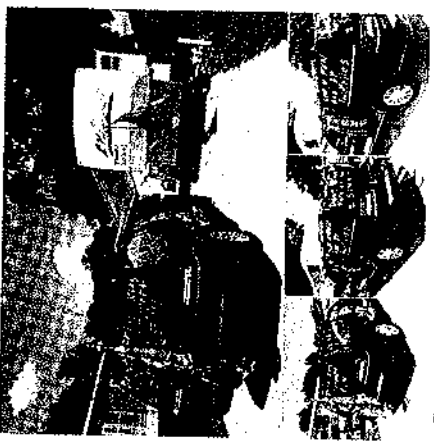
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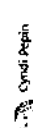
Naimy Keys

I heard the truck was parked left of playground now opps. Home owners said sun in finkers come have a word as others are.



Seen by 27

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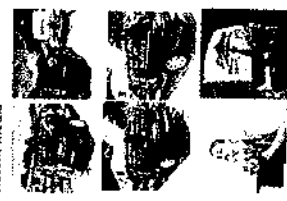


Cynthi Pepin

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JUST A COUPLE OF WEEKS



Over 30 hidden cameras in Sun N Fun

suncommunities August 2, 2020

If you or your children are in the street, the pool, the playground or in the bathroom you are being watched by peepholes like mangle...

...

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The new Sun Communities ANONYMOUS SHOCKING Forum

suncommunities August 2, 2020

This is not even the start to the mega website we are building here about the criminals running the company that is Sun Communities but...

Over 30 hidden cameras in Sun N Fun

The new Sun Communities ANONYMOUS SHOCKING Forum

Whois Carlo Naimey

Welcome to Sun Communities News

RACIST PEOPEHOLE CARLO NAIMNEY

Whois Carlo Naimey

suncommunities August 1, 2020

Carlo Naimey is the peephole stalker women beater that is Gary Shiffman's right hand man. Gary says jump and this little worm says how high...

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ONEY LAUNDRING SCAMS AND FRAUD Sun

Welcome to Sun Communities News

suncommunities August 1, 2020

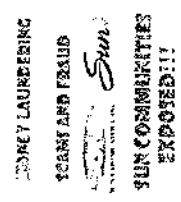
Sun Communities News - Sun Communities News - Microsoft Edge

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August 2020

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criminals running the company that is Sun Communities but...



Whois Carlo Naimey

suncommunities August 1, 2020
Carlo Naimey is the pedophile stalker women beater that is Gary Schiffman's right hand man. Gary says jump and this little worm says how high...

Welcome to Sun Communities News

suncommunities August 1, 2020
Sun Communities News is a website with all the dirty dirt on this crooked company Sun Communities Inc aka Sun Home Services Inc and its...

Welcome to Sun Communities News

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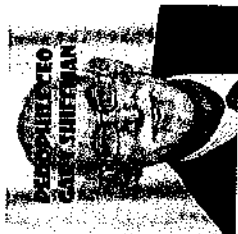
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<https://www.suncommunities.news/gary-a-shiffman/>
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 Over 30 hidden cameras in Sun N Fun The new Sun Communities ANONYMOUS SHOCKING forum Whois Carlo Naimery
 SUN COMMUNITIES NEWS 7 August 2020, Sunday
 ANONYMOUS Forum Gary A Shiffman Carlo Naimery Britat Chase Atlas Law Angi Cummings Sun N Fun

Home Gary A Shiffman

Gary A Shiffman

Gary A Shiffman is a famous rich pedophile gay child rapist that owns, runs and is the CEO of Sun Communities. He is one of many that were exposed going to the famous pedophile island of Jeffrey Epstein! Much more to come soon!



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SUN N FUN NEWS
2 August 2020 Sunday

Home Carlo Naimney ANONYMOUS Forum Gary A Shiffman Carlo Naimney Brian Chase Atlas Law Arigi Communities Sun N FUN

The Fund Title Order Florida Law Weekly Pineilaz Co. Docket S

Whois Carlo Naimney

Welcome to Sun CC

Home Carlo Naimney

**RACIST PEDOPHILE
CARLO NAIMNEY**



Carlo Naimney

Carlo Naimney is the assistant Manager at the Sun Communities property called Sun N Fun in Sarasota Florida. Carlo is a women beating stalker and a racist pedophile. if you are thinking of staying at Sun N Fun think again as rs not safe with this man and the other racist managements! He is the boyfriend and right hand man for Pedophile Gary Shiffman and has been to the famous pedophile island with him before Jeffrey Epstein died.

**RACIST PEDOPHILE
CARLO NAIMNEY**



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Windows taskbar with icons for Start, Task View, Edge, File Explorer, and System Tray. System tray shows date and time: 7:02 PM 8/2/2020.

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When comment in Sun N Fun

ANONYMOUS Forum Garv A Shiffman Carro Naimsey Brian Chase Atlas Law Angi Cummins Sun N FUN

Sun Communities NEWS 2 August 2020, Sunday

Welcome to Sun Comu

STARBUCKS THE COMMUNITY

SEARCH

Home Brian Chase Atlas Law

Brian Chase Atlas Law

Brian Chase Atlas Law is the personal lawyer for pedophile Gary Shiffman, MUCH more to come about him soon!



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Over 30 hidden cameras in Sun N Fun
 Sun Communities ANONYMOUS SHOCKING NEWS
 2 August 2020, Sunday

ANONYMOUS Forum | Gary A Schiffman | Carlo Naimney | Brian Chase Atlas Law | Angi Cummins | Sun N Fun

Home Angi Cummins

Angi Cummins

Angi Cummins is the newest manager at Sun N Fun RV resort in Sarasota Florida that has made a name for herself being a bully and a racist. She is called dumb by other employees of the park that have to work with her and they say she has her head up her butt.

She is a super attention whore that likes to let her fat cottage cheese ass hang out of her low cut shorts when she is not working and it grosses people out. MUCH more to come VERY soon!

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Archives

August 2020

Type here to search

7:03 AM 8/2/2020

Like Share Seen by 45
About Public Anyone can see who's in the group and what they post
Visible Anyone can find this group
General Group

Nanny Keys shared a link
So little stalker racist pedophile bully Carlo Michael Naimney
https://carlomichaelnaimney.com/ has a degree in criminology and used
to be in law enforcement. He's from Rhode Island but he called the
police on us 5 times yesterday for a civil matter wearing the police uniform
and made a fool of himself passing off the police and now spent Sun
Communities money hiring a full time police to protect him at the Gale
because he is a sissy coward scared of confrontation with our camera
a... See More
CARLOMICHAELNAIMNEY.COM
carlomichaelnaimney.com

Nanny Keys shared a link
Lesson for home owners here is that if you buy a property in Sun N Fun
Sarasota Florida its just a matter of time before you get bullied out and
lose your home by a eviction notice from Racist scum bullies like Carlo
Michael Naimney
CARLOMICHAELNAIMNEY.COM
carlomichaelnaimney.com

Nanny Keys
The last email I sent to Sun Communities lawyer Brian Chase in
response to his threats was ignored like the one before that:
"You know its very sad to see racist bullies such as yourself, your client
and the management at Sun N Fun have the power to not only bully
me out of Sun N Fun but what your doing to my children you scumbag



See All

Like Share

Nancy Keys 1d ·

The last email I sent to Sun Communities lawyer Brian Chase in response to his threats was ignored like the one before that:

"You know its very sad to see racist bullies such as yourself, your client and the management at Sun N Fun have the power to not only bully me out of Sun N Fun but what your doing to my children your scumbag. You know my kids go to school here and have friends here but trash like you dont give a fuck. Oh well in the end I hope it was worth it to all involved because google NEVER EVER forgets remember that. You have cost me thousands but its way past money. What you have done to my family will never be forgotten. Do you have kids Brian? Do you have a wife? If you did maybe you would think twice before you bully people and cause harm like you have done and dont take that as a threat cause its NOT! Always! I said my piece. If Gary wants to grow a pair and call me im open east. Really I got nothing against him other than his employees that are racist bullying scum like the staff here and scum like you."

Remember one thing folks we have never ever in the year we been here broken a single rule or got a single letter. As soon as we write Trump 2020 on our RV and start to voice our opinion we get a legal letter warning us to shut up and remove the sign put on our door on paper. The letter demands we shut up and remove the Trump 2020 within 7 days or we will be evicted. Evict us as we are already going to contact news teams NOW and drive them in to film in our Navigator PUNK! You stepped in shit and your covered in it! Have I mentioned we not even got started yet? Oh yes!

Seen by 42

Like Share

Manny Keys 1d ·

I heard the truck was parked in front of playground now opps. Home owners and sun n funers come have a word as others are.



See All

Nanny Keys 1d · 0

The racist lawyer doesnt seem to like the new websites cause he is making empty threats on email with his panties in a bunch! Ive seen the websites you created. This is your one and only opportunity to remove them. In the event they are not taken down within 12 hours i will take legal action, which includes seeking significant punitive damages.

Ben Chase

ewwww scary!!! Here is the response this racist got back! "HAAAA Your funny! I dont think you seem to understand English do you or you realize who you are fucking with do you? Bro much more famous, powerful lawyers have tried and failed. Ask my new buddy a REAL lawyer Marc, please #asshole all over CNN Ask \$\$\$\$ \$\$\$\$ that owns half of Las Vegas. Bro the list goes on and on. I make millionaire racist pieces of shit like your client and lawyers like you learn the law about fucking with people like me for over a decade. Within 12 hour shit is going to fly so far across the net it will make google spin from what I heard. SUE ME! ITS A CIVIL MATTER PUNK!

I didnt create anything but keep threatening me. I told you before you will not bully me or win with me and im sue proof. Get a default judgement and wipe the shit coming from your mouth with it. down YOU FUCKING RACIST MOTHER FUCKER"

Now this is a lesson to learn folks! Dont kick the bull if you dont want the horns. Dont kick the bees nest if you dont want to get stung.

Seen by 45

Like Share

Nanny Keys shared a link

Carlo Michael Naimy aka Carlo Naimy from Sun N Fun Sarasota now also has his own com right here: http://carlomichaelnaimy.com/ whos next? LOL Tick tick tick tick! Die! I mention I hat even got started yet?

Dont worry if your on my LIST and you get your com ill put childraps.com or some shit after your name or buy you something else even better. ALWAYS WIN! you kick the bull you get the horns!

CARLOMICHAELNAIMY.COM carlomichaelnaimy.com

Seen by 42


Like Share


TRUTH of the Bubble - SNF Sarasota FL - Community Forum & Classifieds


Public group · 62 members


[About](#) [Discussion](#) [Members](#) [Events](#) [Media](#)

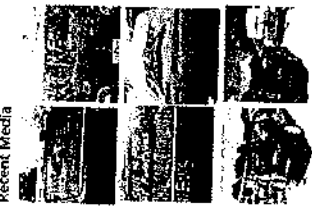
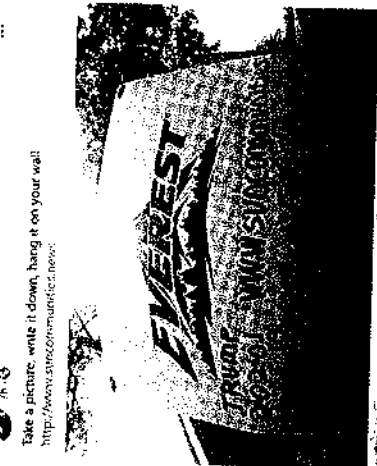
New Activity

 **Nanny Keys**
 Remember folks, there is something called freedom of the press and special privileges us news reporters get to cover news! LOL
 Seen by 18

 **Public**
 Anyone can see who's in the group and what they post

 **Visible**
 Anyone can find this group.

 **General Group**

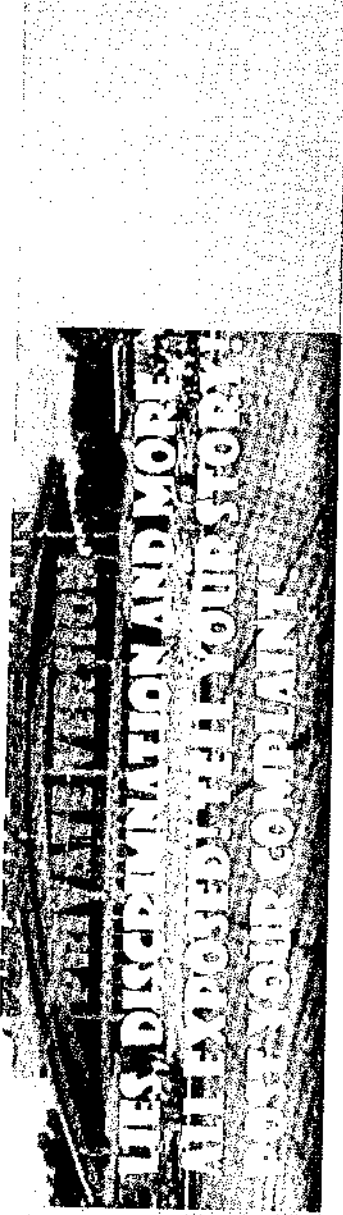


See All

From: Nan nanny <nannannyone@gmail.com>
Sent: Monday, July 27, 2020 4:09 PM
To: Gena May <GMay@suncommunities.com>; Angi Cummins <ACummins@suncommunities.com>; Carlo Naimey <cnaimey@suncommunities.com>
Subject: Re: Boat parking and discrimination

EXTERNAL EMAIL - Verify sender before opening links or attachments!

Gena I will tell you why "this is escalating to such a level of intensity that it is", is because of emails just like this one that took you 5 whole days to reply to me with nothing addressing my issue what so ever and still have not called me like I asked. As for threats I dont make threats I make promises and Im headed to Facebook and review sites right now since I STILL have not got someone call me from Corporate to resolve this once and for all which this issue has been going on for several months now.



PRIVATE TRUTH of the Bubble
SNF Sarasota FL - Community
Forum & Classifieds

Private group · 31 members

Join Group

About This Group

- Private**
Only members can see who's in the group and what they post.
- Visible**
Anyone can find this group.
- General Group**
- History**
Group created on July 22, 2020. See More

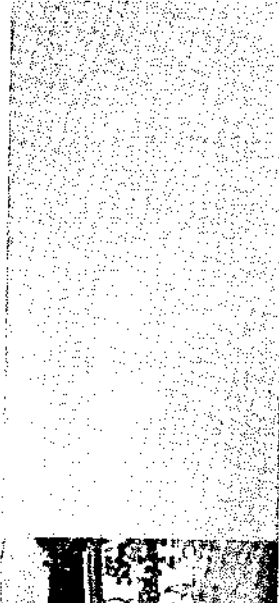
Members · 31

Nanny is an admin.

Activity

9 new posts today
12 in the last month
31 total members
- 31 in the last year

<https://www.facebook.com/Groups/338979584163921>
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TRUTH of the Bubble - SNF
Sarasota FL - Community Forum & Classifieds
 Public group · 34 members

About Discussion Members Events Needs

New Activity
 Nancy Kern made the group TRUTH of the Bubble - SNF Sarasota FL - Community Forum & Classifieds
 13 · 3

View 1 more comment
 Nancy Kern
 I saw the little boy, 20 beautiful Meters tall but painted in a tumor and blocked me. How Wanky of him. Go cry to your boyfriend now. P.S. 888-888-8888
 like 10 · 10 · 10

Comments
 If you ever something funny. My 2 boxes are ADULT. People are not ever needed for and we are still great friends. I have members of our family who are of color, love them to pieces. For her to call me racist, not respecting me or my friends or... See More
 like 10 · 10

See All
 Rad Henrich replied · 2 weeks ago

Recent Media
 See All

<https://www.facebook.com/nancy.kern.171> [AZUS - appspgdnvnlvaxus/relatn8210-qz9d8QIbasePkwzPpGtUctrya1_Fgformdsf03V9S736N15](#)
 2:49 PM 7/29/20



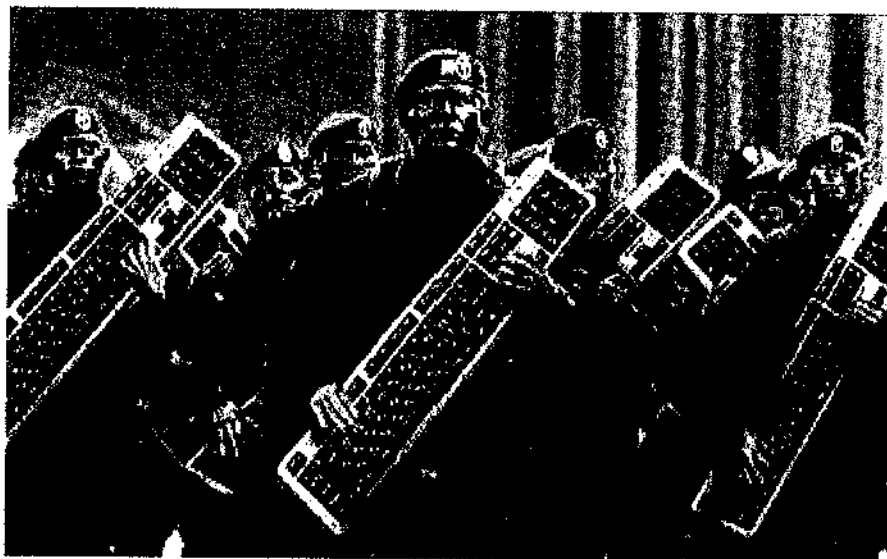
Nanny Keys

5h · 🌐

...

So Carlo Naimey gave his buddy Jim Martin from Apollo Air our personal info along with all the libel lies they been posting attached to it. Debbie Williams has been helping distribute it on her groups and putting ourselves and 3 children in danger. We called the police out tonight and made a report on everyone and basically we were told what we already knew that this is all a CIVIL MATTER and they cant do shit!

I am going to tell you our little secret we didnt want to let out of the bag yet but now that its time here goes! I hope every internet tough guy that was bullying us online and put us in danger knows how to build websites because we do! We are professionals at these online libel games! Let the games begin folks let the games begin! Anyone else want to be famous write your name down below cause the shit is about to start flying all over the internet about every single racist at Sun N Fun and everyone that bullied us out of the park. .com's will be bought and open posting forums and wiki sites with blogs will be built. My husband is a Search engine expert and been doing this all his life! We are going to attach online everyone around you and connected to you in any way also! You want put our kids in danger NO PROBLEM! Hope it was worth it to all! We are sue proof so lets now play internet games and see who wins! Let see who is going to be hiding behind the keyboard now!



1 Comment · Seen by 33

👍 Like

🔗 Share



Nanny Keys

I forgot to mention we got videos and will be getting more! Stay tuned!

...

Like 2h

Manny Kays ...



Manny Kays • PRIVATE TRUTH of the Dubble SNF ... Community Forum & Classifieds

Arthur will has a certain little creepy manager that's really gay but in the closet was married like 15 years ago to another certain other manager. Also that he is now having a affair with another someone in the office who's first name starts with H. A an 9 months later she had a kid hmmm. Someone's kid saw them at night coming out of a dark room late at night together I am told but wonder if its true? Also that his spouse he lives with is not really his spouse and that she is not even on the lease as required and that someone got thrown out for even saying this what do you all know? These are the juicy beans that I will see spilled around here. Open camp on isle 5

11/1/2020

3:17

100%



TRUTH of the Bubble -...



Live

Photo

Room

From Notifications



Nanny Keys



Admin • 8m •

It amazes me how many white privileged racist and white supremacist live in this park and are going out of there way to try and lie and bully me on the SNF Official group but I tell you what I am taking names and listing profiles. I am making a list! STAY TUNED! No matter how this all ends if we have to move out or not each and every person will forever have a long extensive google record of what they have done and or said! its all up to Gary Shiffman really and we will hold him accountable for how this all ends but either way we will never be silenced or back down! NEVER!

#asianlivesmatter #blacklivesmatter #stopracism



Like



Comment



Share

New Activity

SORT



Nanny Keys



Admin • 6h •

POP Quiz!





Nanny Keys shared a link.

10h · 🌐

...

<https://youtu.be/dlW37AGZ0Pj0>



YOUTUBE.COM

The Bad Guy Speech (Scarface)

Tony Montana: What you lookin' at? You all a bunch of fuckin' assho...

2 Comments · Seen by 31

👍 Like

🔗 Share



Peggy Montes

Rumor has it that you are a male hacker posing as a female.

...

Like · 10m



Nanny Keys

well if I am sounds like there are a lot of people that have a lot to worry about ehhehhh? Let the games begin!

...

Like · 7h

Fire Carlo Naimey from Sun N Fun Sarasota Florida

Petition details Comments Updates

Fire Carlo Naimey from Sun N Fun Sarasota Florida

1 has signed. Let's get to 100!

Tommy 33800
United States

Click to try terms and comment on this petition



By signing this petition, I agree to the following terms and conditions: I agree to use my real name and email address, and I agree to release the organizers from any liability for my actions.

My signature is visible on this petition to Sun Communications CEO Gary Shiffman

Carlo Naimey is the assistant manager at Sun N Fun Sarasota Florida and he works for Gary Shiffman which is CEO of Sun Communities. After publicly complaining about being discriminated against, bullied and harassed by Carlo Naimey and having our personal info leaked onto Facebook by him I have had a ton of women and others message me about him and how he has done this to countless tenants and guest. He has sexually harassed countless women and also ran countless people out of the park that has spoken up against him. He is a bully, stalker and loves to harass and bully people, follow you around on the cameras he set up in the park and on his golf cart. If you think he is not watching you he is!

This petition is to have CEO Gary Shiffman finally get rid of this little criminal that is his personal bully. Please sign it even if you use an Anonymous account to show Gary that this needs to stop NOW!

Start a petition of your own
This petition starter should go and look active.
Will you do the same?

[Start a petition](#)

https://www.change.org/p/sun-communities-ceo-gary-shiffman-fire-carlo-naimen-from-sun-n-fun-sarasota-florida

- Asana To Do List
- Soluno
- Hills Co. Docket Search
- Hills. OR Search
- Civil Practice Handbo
- Trial Archives
- The Fund Title Order
- Florida La

the park that thas spoken up against him. He is a bully, stalker and loves to harass and bully people, follow you around on the cameras he set up in the park and on his golf cart. If you think he is not watching you he isi

This petition is to have CEO Gary Shiffman finally get rid of this little criminal that is his personal bully. Please sign it even if you use a Anonymous account to show Gary that this needs to stop NOW!



Start a petition of your own

This petition starter took 13 and took action
Will you do the same?

Start a petition

Updates

Naim naimy started this petition

45 minutes ago


Reasons for signing

Sign this petition and be the first to add your comment.

Signature of the user

Petitions promoted by other Change.org users

For Dora Nalley from Sun N Fun Sarasota...



Just in: More Instant Savings!
 Claim this every week, all month
[Shop Now](#) →

HIIP123/456/789/1011/121314/151617/1819/2021/22/23/24/25/26/27/28/29/30/31/32/33/34/35/36/37/38/39/40/41/42/43/44/45/46/47/48/49/50/51/52/53/54/55/56/57/58/59/60/61/62/63/64/65/66/67/68/69/70/71/72/73/74/75/76/77/78/79/80/81/82/83/84/85/86/87/88/89/90/91/92/93/94/95/96/97/98/99/100

Sun N Fun Sarasota Florida is currently offering a special promotion on our instant savings. To receive this offer, you must be a member of Sun N Fun Sarasota Florida. This offer is available to all members who have not yet received this offer. To see if you are eligible for this offer, please visit [www.sunnfun.com](#).

This offer is available to all members who have not yet received this offer. To see if you are eligible for this offer, please visit [www.sunnfun.com](#).

1 https://paste.ee/p/WT1dz2?bclid=IwAR1c7DPvIaQ1nQ7AXFupw_LyB-icfjysMhngAOEZYPubfMAfDaFMXQLPgU

Billing Sheet Asana To Do List Soluno Hills Co. Docket Sears Hills, OR Search Civil Practice Handbo Trial Archives The Fund Title Order Florida Law Weekly ☆ P1

Paste.ee 1000 Paste.ee



Description: Fire Carlo Naimy from Sun N Fun Sarasota Florida
Submitted on July 31, 2022 at 12:11 PM

1 https://www.change.org/p/sun-communities-eco-gary-shiffman-fire-carlo-naimy-from-sun-n-fun-sarasota-florida (Text)

- 2
- 3 Fire Carlo Naimy from Sun N Fun Sarasota Florida
- 4 Carlo Naimy is the assistant manager at Sun N Fun Sarasota Florida and he works for Gary Shiffman which is CEO of Sun Communities. After publicly complain
- 5 THIS petition is to have CEO Gary Shiffman finally get rid of this little criminal that is his personal bully. Please sign it even if you use a anonymous or

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Fire Carlo Naimrey from Sun N Fun Sarasota Florida

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<https://www.change.org/p/sun-n-fun-sarasota-florida>

Fire Carlo Naimrey from Sun N Fun Sarasota Florida
 Carlo Naimrey is the assistant manager at Sun N Fun Sarasota Florida and he works for Gary Britzman which is CEO of Sun Communications. After publicly complaining about being discriminated against, bullied and harassed by Carlo Naimrey and having our personal info leaked onto Facebook by him I have had a ton of women and others message me about him and how he has done this to countless women and girls. He has sexually harassed countless women and also ran countless people out of the park that they spoken up against him. He is a bully, teacher and loves to abuse and bully people. Follow you abuse on the internet we get up in the park and on his golf carts. If you speak to us next watching you he is.

This petition is to have CEO Gary Britzman finally get rid of this little criminal that is his personal bully. Please sign it even if you use a anonymous account to show Gary that this needs to stop.

RAW Paste Data

<https://www.change.org/p/sun-n-fun-sarasota-florida>

Fire Carlo Naimrey from Sun N Fun Sarasota Florida
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Nanny Keys

5h · 🌐

...

POP Quiz!

How many people work for Sun N Fun Sarasota? How many of them are blacks, Latinos and other races other than white? How many are racist? More to come folks as this is going to be VERY interesting indeed! Leave your comments below!

👍 1

1 Comment · Seen by 49

👍 Like

🔗 Share



Michelle Lynn Miller

Never worked there but visited a couple times. Nothing but ignorant cousin fucking window lickers

...



Like · 4h

👍 1

About

🌐 Public

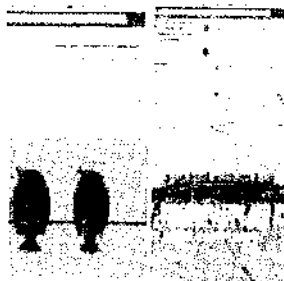
Anyone can see who's in the group and what they post

👁 Visible

Anyone can find this group.

👤 General Group

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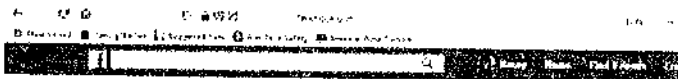


Nanny Keys

16h · 🌐

...

RACIST Helen Kapalowski that runs the Out the bubble group **HAS NOW BLOCKED ME FROM THE GROUP FOR NO REASON** other than she is a racist that supports racism because she supports racist that discriminate and she also removes post from victims of racism off her group. I have not even posted anything since she removed my last post calling out the racist in the park. If you cover up racism and silence a victim you are a **RACIST!** Here is her profile <https://www.facebook.com/kapalowski>



Sorry, this content isn't available right now.

Privacy or other restrictions may be preventing this content from being displayed. You can check your privacy settings to learn more.

👍 1

Seen by 50



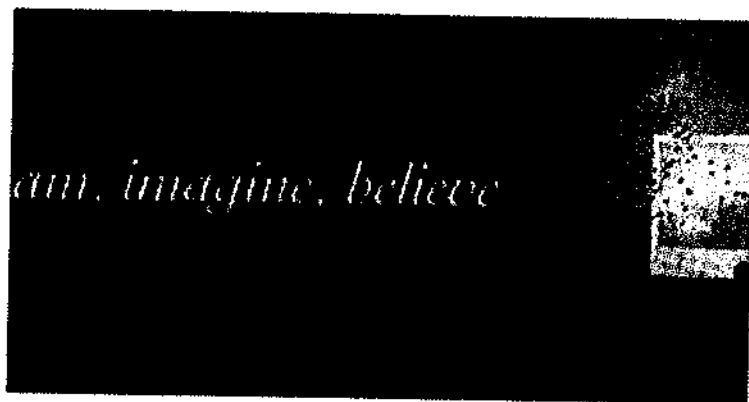
Nanny Keys shared a profile.

1d ·

...

CHANGE MY MIND! Comment below:

Helen Kapalowski that runs the Out the bubble group is a racist that supports racism because she supports racist that discriminate and she also removes post from victims of racism off her group. If you cover up racism and silence a victim you are a RACIST! Here is her profile <https://www.facebook.com/kapalowski>



WORKS AT SELF-EMPLOYED

Helen Kapalowski

21 Comments · Seen by 58

Like

Share



Nanny Keys

Also so you call a victim of racism telling on racist Political ... and fell a need to remove it? WOW just WOOW

Like · 1d



Nanny Keys

And folks her silence now says wonders doesnt it. Too many racist in this world! ...

Like · 1d



Connie Gillespie-Huffaker ...



Like · 1d

2



Dot Schmitendorf

You've overplayed the racist card... everyone who disagrees with you or wants more information before perhaps agreeing with you, is not racist... quit using racism as an excuse to be a bully!

...

ABOUT



Public

Anyone can see who's in the group and what they post



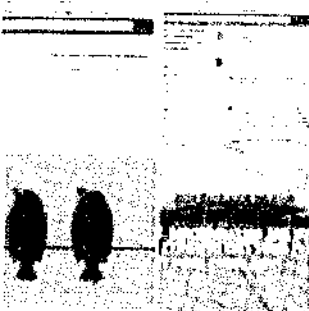
Visible

Anyone can find this group.



General Group

Recent Media



See All



Nanny Keys shared a profile.

1d · 🌐

...

Debbie Williams that runs the SNF IN the bubble group is a racist that supports racism and silences victims of racism. She not only deleted my post but threw me from the group! She lives in the park as well. Be wamed! Here is her profile: https://www.facebook.com/Debra25587eid=ARBsdemgf-IQCgA11pDvYLyBy_HgzeS3VKfAS-F-2w4CdIFvGBPP5eGMrtZkv6z6u773YkuitIQ77Ydr1



DEBBIE WILLIAMS

👍 1

58 Comments · Seen by 60

👍 Like

➦ Share



Debbie Williams

Well I've been waiting as you have threaten me. This was a big mistake on your part, because unlike you I AM NOT PLAYING GAMES!

...

Like · 1d

👍 1

^ Hide 12 Replies



Nanny Keys
Ok Racist

...

Like · 1d · 🌐 1



Nanny Keys
since you been waiting I will post it to a ton of other sites so get ready to google yourself! IM NOT PLAYING GAMES EITHER YOU RACIST!

...

Like · 1d



Robin Wilson Page
Debbie Williams. who the hell is this person? wow..

...

Like · 21h



Nanny Keys
Robin Wilson Page A person thats tired of being

...

About



Public

Anyone can see who's in the group and what they post



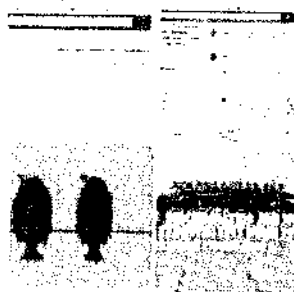
Visible

Anyone can find this group.



General Group

Recent Media



See All



Nanny Keys shared a link.

16m

After hearing from countless people including tons of women that have been stalked and harassed by Carlo Naimey just like us we have started a petition. PLEASE SIGN IT EVEN IF YOU USE A ANONYMOUS ACCOUNT! More important share it on your page and other groups.

Fire Carlo Naimey from Sun N Fun Sarasota Florida

<http://chnq.it/5KGkBHhCWb>

Carlo Naimey is the assistant manager at Sun N Fun Sarasota Florida and he works for Gary Shiffman which is CEO of Sun Communities. After publicly complaining about being discriminated against, bullied and harassed by Carlo Naimey and having our personal info leaked onto Facebook by him I have had a ton of women and others message me about him and how he has done this to countless tenants and guest. He has sexually harassed countless women and also ran countless people out of the park that has spoken up against him. He is a bully, stalker and loves to harass and bully people, follow you around on the cameras he set up in the park and on his golf cart. If you think he is not watching you he is!

This petition is to have CEO Gary Shiffman finally get rid of this little criminal that is his personal bully. Please sign it even if you use a Anonymous account to show Gary that this needs to stop NOW!

PS Just encase Gary Shiffman thinks he is going to have this removed and or silence us as he has already tried with his lawyer Brian Chase of Atlis Law someone has placed it on hundreds of websites all over the net from a computer in Nigeria! Wait till we start not being so nice about these petitions about Gary and others! We are getting fed up fast of him ignoring us!

<https://pastebin.com/7a41VVGh>

<https://paste.ee/p/WTfdz>

<https://controlc.com/a01ebd40>



CHANGE.ORG

This petition is trending



99 signatures are still needed! Fire Carlo Naimey from Sun N Fun Sarasota Florida

Seen by 5

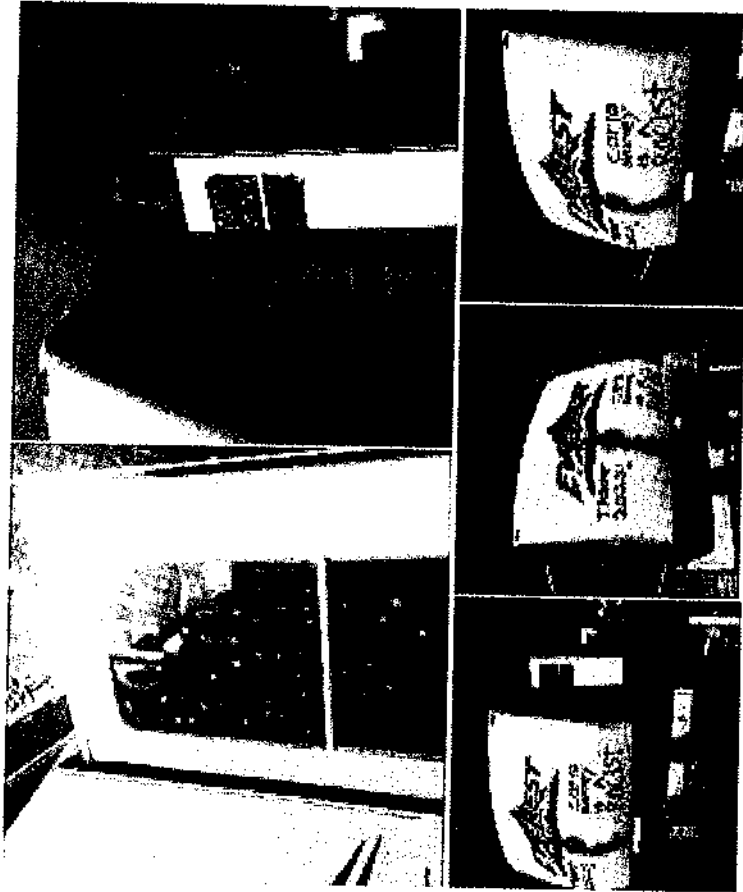
Like

Share


General Group


 **Nanny Keys**
13h · 

The games have began. See lot on Tennessee across from picket ball courts! Who will be next. Stop by and get a pic and share it everywhere and I will repost it. We not going anywhere for many months to come. You thought you could bully a bull and now you can meet the bull. Fun times ahead folks, fun times ahead.

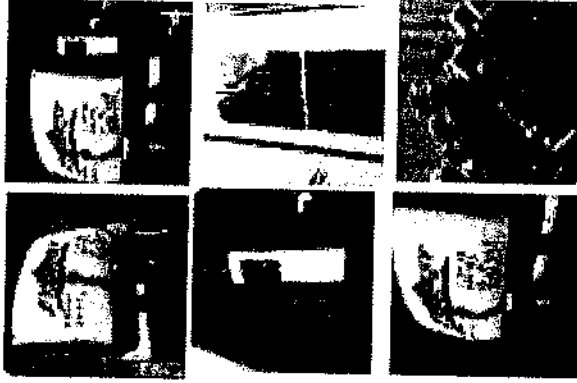


Seen by 36

 Like

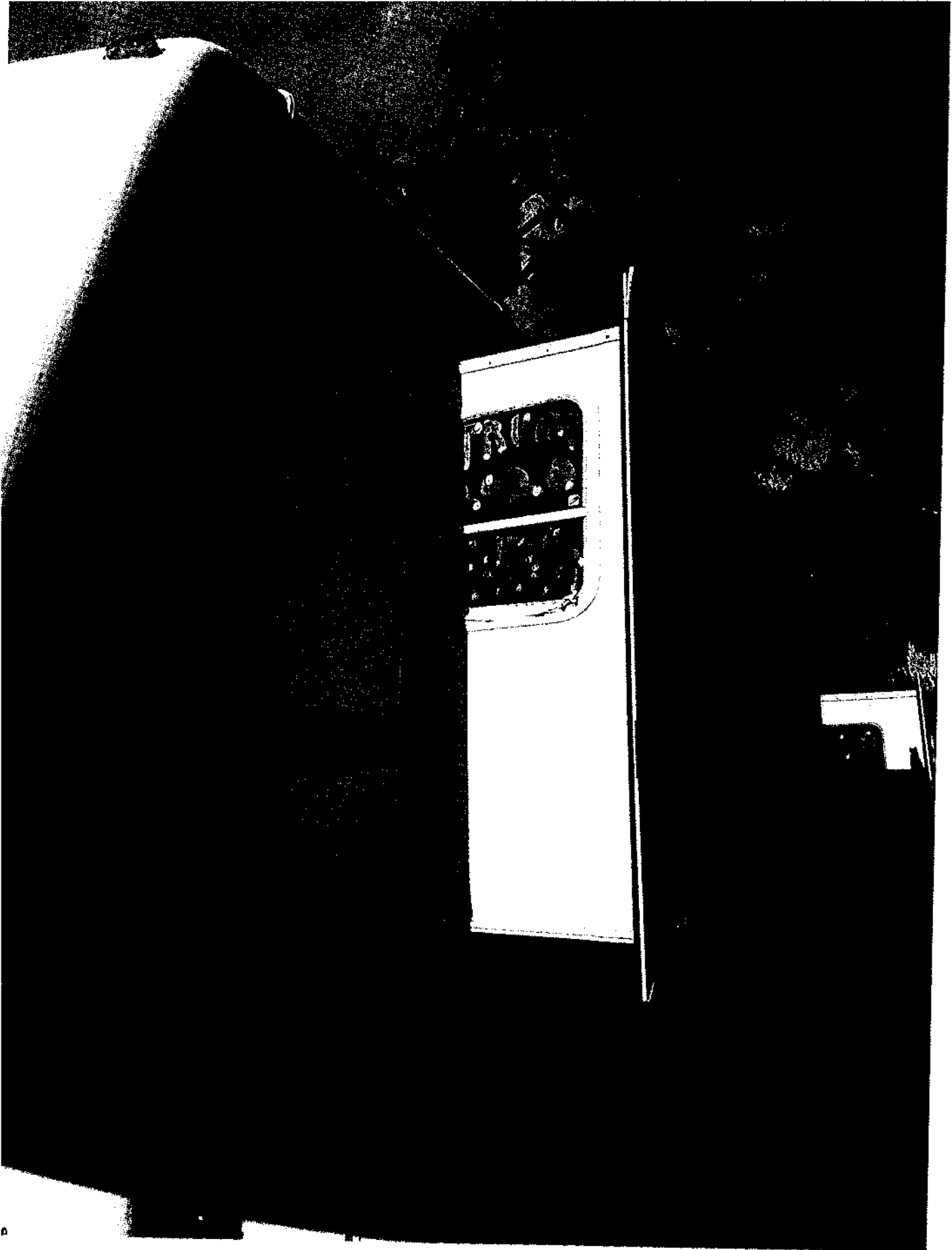
 Share

Recent Media



[See All](#)







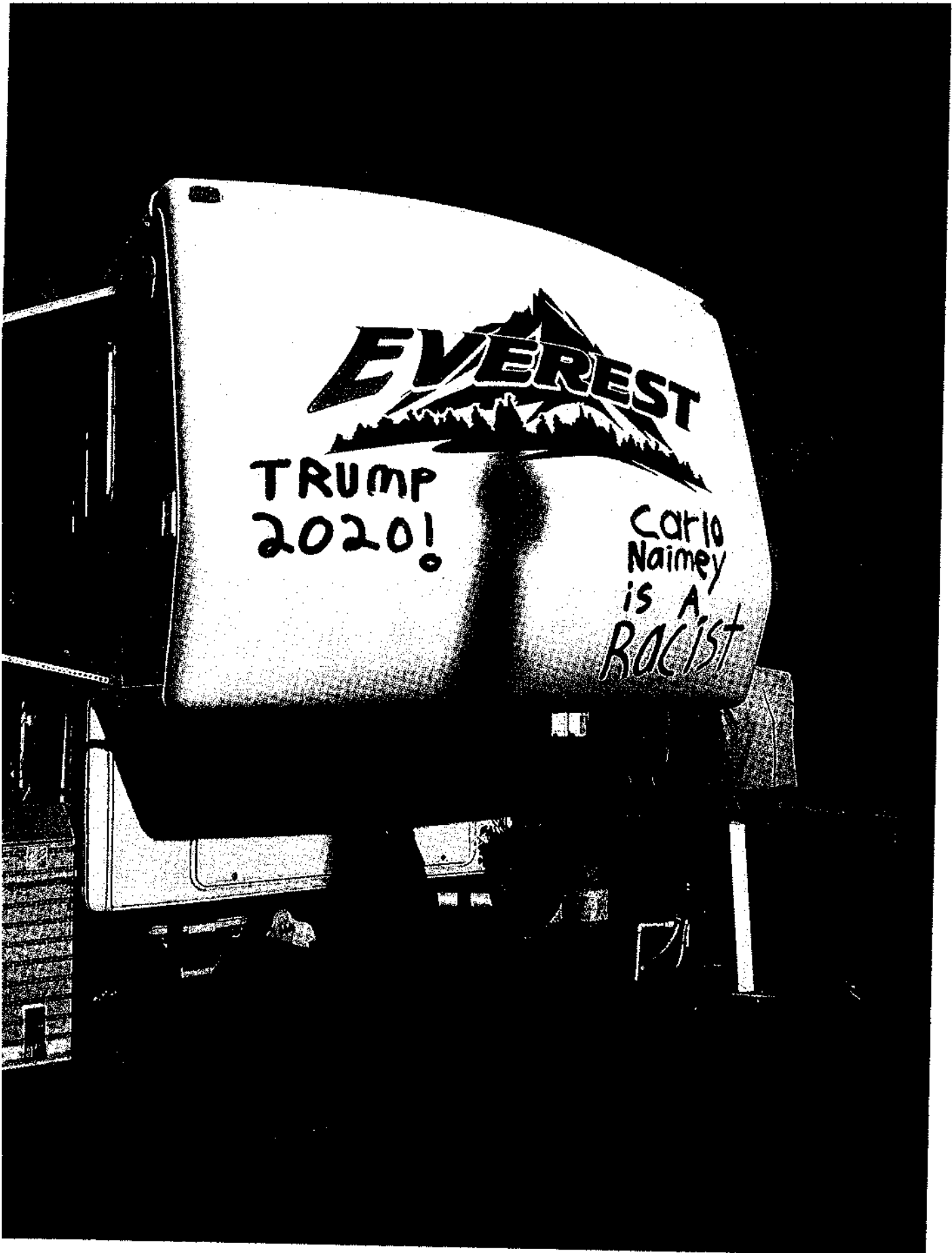




EXHIBIT “C”

WIPO Arbitration and Mediation Center

ADMINISTRATIVE PANEL DECISION

9349-9176 Quebec Inc. and Isotim Capital Trust v. Donald Carlos Seoane / alias Don Seo / Donny Long / Donny Long Network / Donny Long Productions

Case No. D2020-0683

1. The Parties

The Complainants are 9349-9176 Quebec Inc. and Isotim Capital Trust, Canada, internally represented.

The Respondent is Donald Carlos Seoane / alias Don Seo / Donny Long / Donny Long Network / Donny Long Productions, United States of America ("US" or "United States"), self-represented.

2. The Domain Names and Registrars

The disputed domain names <bellafrenchceo.com>, <manyvidscams.com>, and <manyvids.wiki> (each individually a "Disputed Domain Name" and collectively the "Disputed Domain Names") are registered with Name.com, Inc. (Name.com LLC) and NameCheap, Inc. (the "Registrars").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on March 20, 2020. On March 20, 2020, the Center transmitted by email to the Registrars requests for registrar verification in connection with the Disputed Domain Names. On March 20 and 23, 2020, the Registrars transmitted by emails to the Center their verification responses confirming that the Respondent is listed as the registrant and providing the contact details. On March 24, 2020, the Center requested the Complainant amend the mutual jurisdiction section of the Complaint. On April 1, 2020, the Complainant filed an amended Complaint.

The Center verified that the Complaint, together with the amended Complaint, satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the "Policy" or "UDRP"), the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules"), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the "Supplemental Rules").

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on April 2, 2020. In accordance with the Rules, paragraph 5, the due date for Response was April 22, 2020. The Response was filed with the Center on April 13, 2020.

The Center appointed Nick J. Gardner as the sole panelist in this matter on April 20, 2020. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

4. Factual Background

It is convenient to say at this stage that the Respondent does not appear to take issue with much of the factual material set out in the Complaint and accepts that he is the person responsible for the content of the websites linked to the Disputed Domain Names. The Panel will therefore set out in this section what appears to be accepted as the factual background.

The Complainants are related entities in a group of entities, which operate a business via a website linked to the domain name <manyvids.com>. That business is described in this decision as "manyvids.com". Given the position taken by the Respondent, it is not necessary to distinguish between the Complainants who can for practical purposes be treated as a single entity and as the owner and operator of the manyvids.com business. That business involves the provision of access to pornographic content in return for payment. That content is primarily webcam streaming content provided by individual adult "performers". The chief executive of the Complainants

is an individual whose stage name is "Bella French". It appears she enjoys some reputation as an adult entertainer or performer (see below).

Manyvids.com has over 2.4 million active members, with 300,000 unique online visitors daily, which leads to around 64 million page views per month.

Entities within the Complainants' group own registered trademarks for the term "manyvids" (for example US registration No. 5,558,426, registered on September 11, 2018) and have pending applications for the name "Bella French" (for example Canadian application 1,954,501 filed on March 29, 2019). The Complainants and/or their associated entities also claim common law rights in these trademarks. These trademarks are licensed to the Complainants.

The Respondent is an individual whose full legal name is Donald Carlos Seoane. The Respondent goes by the alias Don Seo, and carries on business under the names Donny Long, Donny Long Network, and Donny Long Productions. On December 10, 2019, the Respondent registered as a user on manyvids.com and provided manyvids.com his contact details. On December 12, 2019, the Respondent's membership of manyvids.com was terminated for alleged breaches of its terms of business. The Respondent then sent various emails to the Complainant on December 12, 13, and 14, 2019, in which he made the following statements (expletives deleted/censored):

"Ok fine I shall do back to you what you have done to me so ENJOY! Get ready cause its going to be a long haul of a lot of [] thrown all over google about you and every single member on your site. Bella you wont like what google will bring up with your name when im done I promise you. Did i mention im sue proof? LOL Lets play ball. bellafrenchrealname.com is available! LOL Better hope I dont by that and start having fun with it. You asked for this not me Bella. Your turn!"

"manyvidsleaks.com is available! ahahahaha Come on now lets have some fun. You want to kick the bull you WILL get the horns you dumb []. This is going to be fun! I will get all your members dancing over to othersites I promise you. I got nothing but time and money to make your life HELL! You started it remember that. You want libel and bully me now its your turn!"

"Well good morning and what a wonderful morning it is. I wanted to let you know each and ever morning I wake up checking my stats on all the other company accounts I make money with and do business with under someone elses name [[to keep myself sue proof]] I also will be making a new site about you. Since you are costing me money without reason as I had done nothing to you or your members when you suspended me I will find justice and cost you more and more money each day ruining your reputation myself. That 110 dollars in 1 day my account made that would have been 110 each day or more will be 1000 i cost you each day!

Here is another new domain name for you [https://manyvids- warning.blogspot.com/](https://manyvids-warning.blogspot.com/)
EVERY SINGLE DAY I WILL MAKE A NEW ONE.
ALSO I SPREAD IT ALL OVER THE NET EACH TIME.

<https://pastebin.com/aGPcdaWf>

<https://controlc.com/a3ade871>

<https://paste.ee/p/C1Mty>

<http://archive.is/8TuAy>

You know EVERYBODY in porn does good business with me because they ALL know better than to [] with me and kick the bull and get the horns but you [] and [] are just to [] stupid. Mentally ill sickos! Come sue me or face me and try to shut me up I dare you! Ill be waiting!"

And finally,

"Its live! Enjoy! <http://www.manyvids.wiki/>"

The Disputed Domain names were registered as follows: <manyvids.wiki> – registered December 14, 2019; <bellafrenchceo.com> – registered December 16, 2019; <manyvidscams.com> – registered January 4, 2020.

The Respondent launched a website linked to "manyvids.wiki" on or around December 14, 2019. It contains material that makes serious allegations about, and is highly critical of, manyvids.com's staff, users, and Bella French, as well as disseminating such content via a newsletter to anyone that signs up to the website's mailing list. On or around December 16, 2019, the Respondent launched a website linked to "bellafrenchceo.com", which contains material critical of Bella French and a link to the "manyvids.wiki" website. On or around January 4, 2020, the Respondent launched a website linked to "manyvidscams.com", which lists what purports to be a list of names of persons providing webcam content via the manyvids.com business. The only substantive text on the website reads as follows [with material said to be defamatory redacted] "Here will be a website all about ever single webcam model that chooses to support the [redacted] at Manyvids by webcamming on there [sic] live webcam site. Here will be a perfectly SEOed website with pages about each criminal with there [sic] real name and more! Manyvids is run by [allegation redacted] named Bella French real name [redacted] and [allegation redacted][name redacted]. More to come very soon! Here is a lost [sic] of criminals camming currently on MV" – there then follows a list of around 100 or so names. Most of the names are obviously pseudonyms (e.g., "NaughtyKitty93") although some names are in more conventional form and may or may not be pseudonyms.

None of the websites the Respondent has created appear to contain any advertising or commercial content although their clear intent is to seek to disparage and damage the business of the Complainants.

5. Parties' Contentions

A. Complainant

The Complainant's case can be summarized as follows.

- a) The Disputed Domain Names are each identical or confusingly similar to their "manyvids" or "Bella French" trademarks.
- b) The Respondent does not have any rights or legitimate interests in the Disputed Domain Names.
- c) The Respondent uses each of the Disputed Domain Names in bad faith by linking them to content that is untrue and which is derogatory and defamatory.

B. Respondent

The Response takes the form of an email expressed in heated and emotive terms. Essentially, the Respondent alleges that the Complainants and those involved with them are criminals engaged in unlawful activity and his websites are commenting on that activity and are noncommercial and are protected by doctrines of fair use and free speech. He says the Complaint is "fraudulent".

The Respondent says that he is within paragraph 4(c)(iii) of the Policy as he is "making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue" and includes a lengthy passage which is an extract from a blog post titled "Noncommercial and Fair Use in Rebutting Claims for Abusive Registration of Domain Names" written by a third party. This section of the Response cites a large number of previous UDRP decisions dealing with the issue of whether a noncommercial criticism website establishes a legitimate interest. Where relevant these cases are discussed below.

6. Discussion and Findings

Introduction

The Panel will preface its discussion by saying that it has no knowledge or opinion as to the original dispute between the Complainants and the Respondent, which the Complainants say led to the Respondent's membership of manyvids.com being terminated. The Panel also has no knowledge as to the truth or otherwise of any of the material contained in the websites linked to the Disputed Domain Names although that material contains a range of extremely serious allegations of various forms of criminal conduct. The Complainants allege the material is untrue and defamatory but it is not this Panel's function to determine such issues. The only issue for the Panel is whether the Respondent's registration and use of the Disputed Domain Names falls within the scope of the Policy.

Joint Complainants

The Panel accepts the Complainants' submission that for the purposes of this dispute, the interests of the Complainants are co-extensive, and their grievance against the Respondent arises from common legal interests. See [WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition](#) ("WIPO Overview 3.0"), [section 4.11](#) and panel decisions cited therein.

Substantive Matters

To succeed in respect of each Disputed Domain Name, in accordance with paragraph 4(a) of the Policy, the Complainants must satisfy the Panel that:

- (i) the Disputed Domain Names are identical with or confusingly similar to a trademark or service mark in which the Complainants have rights;
- (ii) the Respondent has no rights or legitimate interests in respect of the Disputed Domain Names; and,
- (iii) the Disputed Domain Names have been registered and are being used in bad faith.

A. Identical or Confusingly Similar

The Complainant has submitted evidence that they are the licensees of trademarks for the term "manyvids" (the "MANYVIDS trademark") and trademark applications for the name "Bella French" (the "Bella French trademark"). Whilst a pending application on its own will not generally amount to a trademark for the purposes of the policy, a common law / unregistered trademark will. See [WIPO Overview 3.0, section 1.3](#), on this issue as follows:

"1.3 What does a complainant need to show to successfully assert unregistered or common law trademark rights?"

To establish unregistered or common law trademark rights for purposes of the UDRP, the complainant must show that its mark has become a distinctive identifier which consumers associate with the complainant's goods and/or services.

Relevant evidence demonstrating such acquired distinctiveness (also referred to as secondary meaning) includes a range of factors such as (i) the duration and nature of use of the mark, (ii) the amount of sales under the mark, (iii) the nature and extent of advertising using the mark, (iv) the degree of actual public (e.g., consumer, industry, media) recognition, and (v) consumer surveys.

(Particularly with regard to brands acquiring relatively rapid recognition due to a significant Internet presence, panels have also been considering factors such as the type and scope of market activities and the nature of the complainant's goods and/or services.)

Specific evidence supporting assertions of acquired distinctiveness should be included in the complaint; conclusory allegations of unregistered or common law rights, even if undisputed in the particular UDRP case, would not normally suffice to show secondary meaning. In cases involving unregistered or common law marks that are comprised solely of descriptive terms which are not inherently distinctive, there is a greater onus on the complainant to present evidence of acquired distinctiveness/secondary meaning."

In the present case given the Complainants have filed evidence including in particular details of a series of media interviews and profiles which detail "Bella French's" reputation as an adult entertainer and which in the Panel's opine suffice to establish trademark rights in the term Bella French.

The Panel also considers that the Complainants status as licensees of the trademarks suffices for the purpose of this element – see [WIPO Overview 3.0 at section 1.4](#):

"Does a trademark owner's affiliate or licensee have standing to file a UDRP complaint?"

1.4.1 A trademark owner's affiliate such as a subsidiary of a parent or of a holding company, or an exclusive trademark licensee, is considered to have rights in a trademark under the UDRP for purposes of standing to file a complaint".

The Panel holds that each of the Disputed Domain Names <manyvids.wiki> and <manyvidsscams.com> are confusingly similar to the MANYVIDS trademark. These Disputed Domain Names, as registered by the Respondent, incorporate the MANYVIDS trademark. Previous UDRP panels have consistently held that domain names are identical or confusingly similar to a trademark for purposes of the Policy, "when the domain name includes the trademark, or a confusingly similar approximation, regardless of the other terms in the domain name" (*Wal-Mart Stores, Inc. v. Richard MacLeod d/b/a For Sale*, [WIPO Case No. D2000-0662](#)). The only differences in the present case are the addition of the terms "cams" in one case. This addition does not suffice to negate the similarity between that Disputed Domain Name and the Complainant's MANYVIDS trademark (see discussion below).

It is established that, where a mark is the distinctive part of a disputed domain name, the disputed domain name is considered to be confusingly similar to the registered mark (*DHL Operations B.V. v. DHL Packers*, [WIPO Case No. D2008-1694](#)).

It is also established that the addition of a term (such as here words such as "cams") to a disputed domain name has little, if any, effect on a determination of identity or confusing similarity between that disputed domain name and the mark (*Quixtar Investments, Inc. v. Dennis Hoffman*, [WIPO Case No. D2000-0253](#)); furthermore, mere addition of a dictionary or descriptive term does not exclude potential confusion (*PRL USA Holdings, Inc. v. Spiral Matrix*, [WIPO Case No. D2006-0189](#)).

For precisely the same reasons, the Panel also concludes that the Disputed Domain Name <bellafrenchceo.com> is confusingly similar to the Complainants' Bella French mark. It simply adds the letters "ceo", an obvious abbreviation for "Chief Executive Officer", and which fails to negate the similarity.

So far as the Disputed Domain Name "manyvidsscams.com" is concerned, the Panel did pause to consider whether this was intended to be a conjoining of the terms "manyvids" and "scams" which would give rise to different considerations (especially as to the second and third elements – below). However, a conjoining of those two terms would result in the term "manyvidsscams" – although it is not inconceivable the double "s" could be replaced by a single "s" whilst retaining the same sense. However, the Panel does not think that is either the intention or the effect in this case – it seems clear the Respondent is intending the term "cams" to refer to cameras or webcams – his content on the site linked to the domain name states "Here is a lost [sic] of criminals camming currently on MV" which clearly relates to the webcam based material offered by individual members providing content via the manyvids.com business. The Panel therefore proceeds on the basis that the MANYVIDS trademark is combined with the generic term "cams" meaning cameras or webcams. In either event (the double or single "s"), the Disputed Domain Name is confusingly similar to the mark at issues and if it were used in the "scams" sense that would be dealt with under the second and third elements.

It is well established that the specific Top-Level of a disputed domain name (in this case ".com" and ".wiki") does not affect the disputed domain name for the purpose of determining whether it is identical or confusingly similar – see for example *Rollerblade, Inc. v. Chris McCrady*, [WIPO Case No. D2000-0429](#).

Accordingly, the Panel finds that each of the Disputed Domain Names is either identical or confusingly similar to the Complainant's trademarks and hence the first condition of paragraph 4(a) of the Policy has been fulfilled.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy non-exhaustively lists three circumstances that demonstrate a right or legitimate interest in a domain name:

- i. before any notice to you of the dispute, your use of, or demonstrable preparations to use the disputed domain name or a name corresponding to the disputed domain name in connection with a *bona fide* offering of goods or services; or
- ii. you (as an individual, business or other organisation) have been commonly known by the disputed domain name, even if you have acquired no trademark or service mark rights; or

iii. you are making a legitimate noncommercial or fair use of the disputed domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

The Complainants have not authorised, licensed, or permitted the Respondent to register or use the Disputed Domain Names or to use any of their trademarks. The Complainants have rights in their trademarks, which precede the Respondent's registration of the Disputed Domain Names. The Complainants have therefore established a *prima facie* case that the Respondent has no rights or legitimate interests in the Disputed Domain Names and thereby the burden of production shifts to the Respondent to produce evidence demonstrating rights or legitimate interests in respect of the Disputed Domain Names (see for example, *Do The Hustle, LLC v. Tropic Web*, [WIPO Case No. D2000-0624](#); *Croatia Airlines d.d. v. Modern Empire Internet Ltd.*, [WIPO Case No. D2003-0455](#)).

The Respondent's case is that he falls within Policy paragraph 4(c)(iii), as he is operating *bona fide* websites seeking to draw attention to the Complainants and what he says are their unlawful activities. As noted above, the Panel has no means of determining the truth of the Respondent's views, or assessing, as the Complainant says, whether they are untrue and defamatory. It appears that the Respondent's websites are noncommercial in that they do not carry any advertising or commercial content. Whilst the Panel has considerable reservations that the content of the Respondent's websites amounts to *bona fide* criticism, it proposes to consider whether, if it assumes in the Respondent's favour that the content of his websites does amount to *bona fide* criticism, that supports a finding of legitimate interest?

In this regard, the Panel has considered the approaches set out as in relation to [section 2.6](#) in [WIPO Overview 3.0](#): "Does a criticism site support respondent rights or legitimate interests?" This states:

"As noted above, UDRP jurisprudence recognizes that the use of a domain name for fair use such as noncommercial free speech, would in principle support a respondent's claim to a legitimate interest under the Policy.

2.6.1 To support fair use under UDRP paragraph 4(c)(iii), the respondent's criticism must be genuine and noncommercial; in a number of UDRP decisions where a respondent argues that its domain name is being used for free speech purposes the panel has found this to be primarily a pretext for cybersquatting, commercial activity, or tarnishment.

2.6.2 Panels find that even a general right to legitimate criticism does not necessarily extend to registering or using a domain name identical to a trademark (*i.e.*, <trademark.tld> (including typos)); even where such a domain name is used in relation to genuine noncommercial free speech, panels tend to find that this creates an impermissible risk of user confusion through impersonation. In certain cases involving parties exclusively from the United States, some panels applying US First Amendment principles have found that even a domain name identical to a trademark used for a *bona fide* noncommercial criticism site may support a legitimate interest.

2.6.3 Where the domain name is not identical to the complainant's trademark, but it comprises the mark plus a derogatory term (*e.g.*, <trademarksucks.tld>), panels tend to find that the respondent has a legitimate interest in using the trademark as part of the domain name of a criticism site if such use is *prima facie* noncommercial, genuinely fair, and not misleading or false. Some panels have found in such cases that a limited degree of incidental commercial activity may be permissible in certain circumstances (*e.g.*, as 'fundraising' to offset registration or hosting costs associated with the domain name and website) [this section only concerns sites that practice genuine, noncommercial criticism. There are many UDRP decisions where the respondent argues that the domain name is being used for a free speech purpose but the panel finds that it is primarily a pretext for commercial advantage."

So the position is that generally panelists accept that a disputed domain name, which comprises simply the complainant's trademark alone or the trademark in combination with non-distinctive terms, is not likely to establish a legitimate interest even if it is used in relation to a criticism site. In contrast, a disputed domain name comprising the trademark in combination with a manifestly derogatory term (*e.g.*, "sucks") is likely to establish a legitimate interest if used in relation to a *bona fide* noncommercial website. However, [WIPO Overview 3.0, section 2.6.2](#), notes that in highly limited scenarios, some panelists will accept the use of the former type of disputed domain names (*i.e.*, the unadorned trademark itself) in relation to a *bona fide* noncommercial criticism website itself establishes a legitimate interest in relation to disputes between two US based entities and relying upon applicable US principles of free speech and fair use. This approach is not generally adopted by other panelists in relation to disputes where one or both parties are not US residents.

The Respondent himself noted this dichotomy in his response, which quotes liberally from a blog post titled "Noncommercial and Fair Use in Rebutting Claims for Abusive Registration of Domain Names" and which discussed this issue in detail.

In the present case, the Complainants are Canadian and the Respondent is presumably a US citizen. In these circumstances the Panel finds the general view as set out in [WIPO Overview 3.0, section 2.6.2](#), appropriate and concludes that even if the content of a website is protected by free speech principles that does not establish a legitimate interest in the disputed domain name where the disputed domain name is identical to the Complainants' trademark. The same is the case where the differences to the Complainants' trademark comprise descriptive but non-critical terms. Different considerations would apply if the disputed domain name combined the Complainants' trademark with a manifestly derogatory term. For the reasons discussed above in relation to the term "manyvidscams", the Panel does not consider that to be the case here.

The Panel therefore concludes that the Respondent's use of the Disputed Domain Names does not establish rights or legitimate interests as they do not in substance differ from the Complainants' trademarks and do not contain a manifestly derogatory term so as to indicate by their nature that they link to a criticism site.

C. Registered and Used in Bad Faith

Under the Policy paragraph 4(b)(iii) evidence of bad faith registration and use is shown if "you have registered the domain name primarily for the purpose of disrupting the business of a competitor". The Panel concludes that this may apply. The Respondent's emails of December 12, 13, and 14, 2019 (set out above) show that the Respondent was clearly intending to use the Disputed Domain Names to disrupt the Complainant's business. The precise extent to which the Respondent is a competitor of the Complainants is perhaps less

clear – it would seem clear from the content of his emails that he is in business on his own account but the Panel cannot tell whether that business competes with that of the Complainants. However, the list in paragraph 4(b) of the Policy is non-exhaustive and the Panel takes the view that a deliberate intention to damage the Complainants' business supports a finding of bad faith in the present circumstances. It seems clear that the Respondent was aggrieved by his suspension from the manyvids.com platform and set about, in his words, to "...find justice and cost you more and more money each day [sic] runing your reputation myself". Whatever the merits or otherwise of the Respondent's dispute with the Complainants, this does not entitle him to act as he has done.

Accordingly, the Panel finds that the Disputed Domain Names have been registered and are being used in bad faith and the third condition of paragraph 4(a) of the Policy has been fulfilled.

7. Decision

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the Disputed Domain Names <bellafrenchceo.com>, <manyvidscams.com>, and <manyvids.wiki> be transferred to the Complainant.

Nick J. Gardner
Sole Panelist
Date: May 4, 2020