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Entertainment, Inc.
6

RECEIVED
APR 10 2015
RICHARD W. WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 WORLD WRESTLING
ENTERTAINMENT, INC.,

11
12 Plaintiff,

13 vs.

14 DOMINIC ANGEL RODRIGUEZ, VU
15 TRUONG TRAN, BENJAMIN ADHAM
16 PECHETTI, IBRAHAM NIMER SHIHEIBER,
and XYZ CORPORATIONS 1-100,

17
18 Defendants.

Case No. 15-1263

**SUPPLEMENTAL DECLARATION OF
LAUREN DIENES-MIDDLEN, ESQ.**

1 I, Lauren Dienes-Middlen, state that:

2 1. I am Vice President, Intellectual Property and Legal Affairs of Plaintiff World
3 Wrestling Entertainment, Inc. ("WWE") located at 1241 East Main Street, Stamford, Connecticut
4 06902. I make this declaration to update my March 16, 2015 declaration with information gathered
5 during WWE's Wrestlemania[®] 31 Weekend Events from March 26, 2015 through March 30, 2015.

6 2. I certify that I have personal first-hand knowledge about the matters discussed below
7 unless otherwise indicated and am competent to testify about them if called upon to do so.

8 3. I was in San Jose and Santa Clara, California, from March 24, 2015 through March
9 31, 2015 for WWE's Wrestlemania[®] 31 Weekend Events. I worked with the law enforcement who
10 enforced this Court's March 24, 2015 Temporary Restraining Order; Order for Seizure of
11 Counterfeit Marked Goods; and Order to Show Cause Why a Preliminary Injunction Should Not
12 Issue.

13 4. Following the issuance of the Court's Order, WWE engaged the Department of
14 Homeland Security ("DHS") to enforce the Court's Order at WWE's Wrestlemania[®] 31 Weekend
15 Events.

16 5. To ensure that all merchandise seized under the Court's Order was properly
17 designated and attributed to the specific counterfeiter who was served, I instructed DHS to complete
18 a "Venue Enforcement Report." A "Venue Enforcement Report" is a form that WWE created to
19 collect the following information about the seizure and the individual from whom the merchandise
20 was seized: (1) Date of the Event; (2) Event Venue; (3) Name of Defendant Served; (4) Address of
21 Defendant Served; (5) Time Defendant Served; (6) Type of Merchandise Seized; (7) Quantity of
22 Merchandise Seized; (8) Approximate Height of Defendant; (9) Approximate Weight of Defendant;
23 (10) Ethnicity of Defendant; and (11) Law Enforcement Involved.

24 6. For each of the Defendants served during WWE's Wrestlemania[®] 31 Weekend
25 Events, DHS team completed a "Venue Enforcement Report." Attached hereto as Exhibit 1 are true
26 and correct copies of the "Venue Enforcement Reports" completed by WWE's enforcement team for
27 the Defendants served.
28

1 7. Attached hereto as Exhibit 2 is a PowerPoint presentation that I created after the
2 Wrestlemania[®] 31 Weekend Events. The presentation illustrates the counterfeit merchandise that
3 WWE seized during the Wrestlemania[®] 31 Weekend Events pursuant to this Court's Order. In
4 addition, the first thirteen slides of the PowerPoint presentation shows WWE counterfeit
5 merchandise that DHS seized as part of a separate raid. As a result of the raid, DHS seized
6 approximately \$3800 of WWE counterfeit merchandise.

7 8. My observations during the Wrestlemania[®] 31 Weekend Events were consistent with
8 my experiences at previous Wrestlemania[®] Weekend Events in that the bootleggers were selling the
9 counterfeit merchandise in front of the venues where the Wrestlemania[®] 31 Weekend Events were
10 being held, in the surrounding streets and in parking areas near the Wrestlemania[®] 31 Weekend
11 Events and areas between the parking locations and the event venues.

12 9. As shown in Exhibit 2, there was a very strong law enforcement presence at the
13 Wrestlemania[®] 31 event in Santa Clara that has not been present during the past Wrestlemania[®]
14 Weekend Events that I have attended. Based on my prior experiences, I believe that the strong law
15 enforcement presence discouraged bootleggers from selling counterfeit merchandise at
16 Wrestlemania[®] 31.

17 10. However, in light of my prior experiences at Wrestlemania[®] Weekend Events,
18 WWE's prior experiences and the bootlegging across the country that WWE encountered in the
19 weeks and months prior to Wrestlemania, WWE expects that the bootleggers will return in full force
20 as there will not be anywhere near the same police presence as there was at the Wrestlemania[®] 31
21 event in Santa Clara.

22 11. In addition, based on my firsthand experience at the Wrestlemania[®] Weekend Events
23 this year as well as prior years as described in my March 16, 2015 Declaration, the counterfeiters at
24 WWE live events are part of one or more nationwide counterfeiting rings wherein large volumes of
25 counterfeit merchandise is created in advance of WWE's pay-per-view events, just like the
26 counterfeit merchandise that WWE seized during the Wrestlemania[®] 31 Weekend Events as well as
27 counterfeit t-shirts. After the pay-per-view event has ended, the counterfeiters will travel to
28

1 upcoming WWE live events in other parts of the United States with the remaining counterfeit
2 merchandise, setup at these live events and continue to sell the counterfeit merchandise. They will
3 also continue to produce and sell new WWE-branded counterfeit merchandise.
4

5 I declare under penalty of perjury that the foregoing is true and correct.
6

7 Executed this 6 day of April, 2015 in Stamford, Connecticut.
8

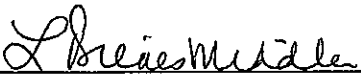
9 
10 Lauren Dienes-Middlen
11 Vice President, Legal and Intellectual Property
12 Business and Legal Affairs
13 World Wrestling Entertainment, Inc.
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EXHIBIT 1

EXHIBIT 1

VENUE ENFORCEMENT REPORT

Date of Event: 3-28-15

Event Venue: SAP CENTER

Name of Defendant Served: Benjamin Adham Pechetti

Address of Defendant Served:
1284 ODDSTAD DRIVE
Redwood City, CA 94063

Time Defendant Served: 1520 hrs

Type of Merchandise Seized: Cardboard photo's

Quantity of Merchandise Seized: 18

Approx. Height of Defendant: 6'1

Approx. Weight of Defendant: 220

Ethnicity of Defendant: w/m

Law enforcement involvement: Homeland Security Investigation (HSI)

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 15-cv-01263-VC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for (name of individual and title, if any) Benjamin Adham Pechetti was received by me on (date) 3-28-15

I personally served the summons on the individual at (place) SAP CENTER on autumn st. on (date) 3-28-15 ; or

I left the summons at the individual's residence or usual place of abode with (name) , a person of suitable age and discretion who resides there, on (date) , and mailed a copy to the individual's last known address; or

I served the summons on (name of individual) , who is designated by law to accept service of process on behalf of (name of organization) on (date) ; or

I returned the summons unexecuted because ; or

Other (specify):

My fees are \$ for travel and \$ for services, for a total of \$ 0.00

I declare under penalty of perjury that this information is true.

Date: 3-28-15

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

VENUE ENFORCEMENT REPORT

Date of Event: 3/29/2015

Event Venue: Levi's Stadium

Name of Defendant Served: Ibrahim Nimer Shihaber

Address of Defendant Served:

347 Skyline

Daly City, CA 94132

Time Defendant Served: 13:40

Type of Merchandise Seized: Flags / Towels

Quantity of Merchandise Seized: 62

Approx. Height of Defendant: 5'7"

Approx. Weight of Defendant: 160 lbs.

Ethnicity of Defendant: W

Law enforcement involvement: HSI Seizure

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 15-cv-01263-VC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* Abraham Nimer Shikheiber
was received by me on *(date)* 3/29/2015.

I personally served the summons on the individual at *(place)* Levis Stadium,
Green Lot 1 (4949 Marie De Bartolo Way) on *(date)* 3/29/2015; or
San Clara, CA 95050

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

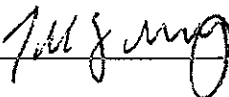
I returned the summons unexecuted because _____; or

Other *(specify):*

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: 3/29/15


Server's signature

Todd Schoenberger
Printed name and title

280 S. First St.
Suite 190
Sandock, CA 95113
Server's address

Additional information regarding attempted service, etc:

VENUE ENFORCEMENT REPORT

Date of Event: 3-28-15

Event Venue: SAP CENTER

Name of Defendant Served: Dominic Angel Rodriguez

Address of Defendant Served:

3015 E. Bayshore Rd., Spc. 202

Redwood City, CA 94063

Time Defendant Served: 3:20 pm

Type of Merchandise Seized: "Fat Heads"

Quantity of Merchandise Seized: 2

Approx. Height of Defendant: 5'7"

Approx. Weight of Defendant: 176 lbs

Ethnicity of Defendant: W

Law enforcement involvement: H&I Seizure

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 15-cv-01263-VC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for (name of individual and title, if any) Dominic Angel Rodriguez
was received by me on (date) 3/26/15

I personally served the summons on the individual at (place) SAP Center on Autumn St.
on (date) 3/28/15; or

I left the summons at the individual's residence or usual place of abode with (name) _____,
a person of suitable age and discretion who resides there,
on (date) _____, and mailed a copy to the individual's last known address; or

I served the summons on (name of individual) _____, who is
designated by law to accept service of process on behalf of (name of organization) _____
on (date) _____; or

I returned the summons unexecuted because _____; or

Other (specify): _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00

I declare under penalty of perjury that this information is true.

Date: 3/28/15

[Signature]
Server's signature

Todd Schornberger
Printed name and title

200 S. First St., Ste 120
San Jose, CA 95113
Server's address

Additional information regarding attempted service, etc:

VENUE ENFORCEMENT REPORT

Date of Event: 3/28/15

Event Venue: SAP Center

Name of Defendant Served: Vu Truong Tran

Address of Defendant Served:

80 Glenn Way Apt B

San Carlos, CA 94070

Time Defendant Served: 3:20 pm

Type of Merchandise Seized: "Fat Heads"

Quantity of Merchandise Seized: 2 ea

Approx. Height of Defendant: 5'5"

Approx. Weight of Defendant: 135 lbs

Ethnicity of Defendant: A

Law enforcement involvement: HSI Seizure

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 15-cv-01263-VC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* Vu Truong Tran
was received by me on *(date)* 3/28/15

I personally served the summons on the individual at *(place)* SAP Center on Autumn
on *(date)* 3/28/15 ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____ ; or

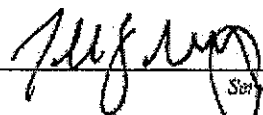
I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00

I declare under penalty of perjury that this information is true.

Date: 3/28/15



Server's signature

Todd Schwemberger

Printed name and title

280 S. First St., Ste 190
San Jose, CA 95113

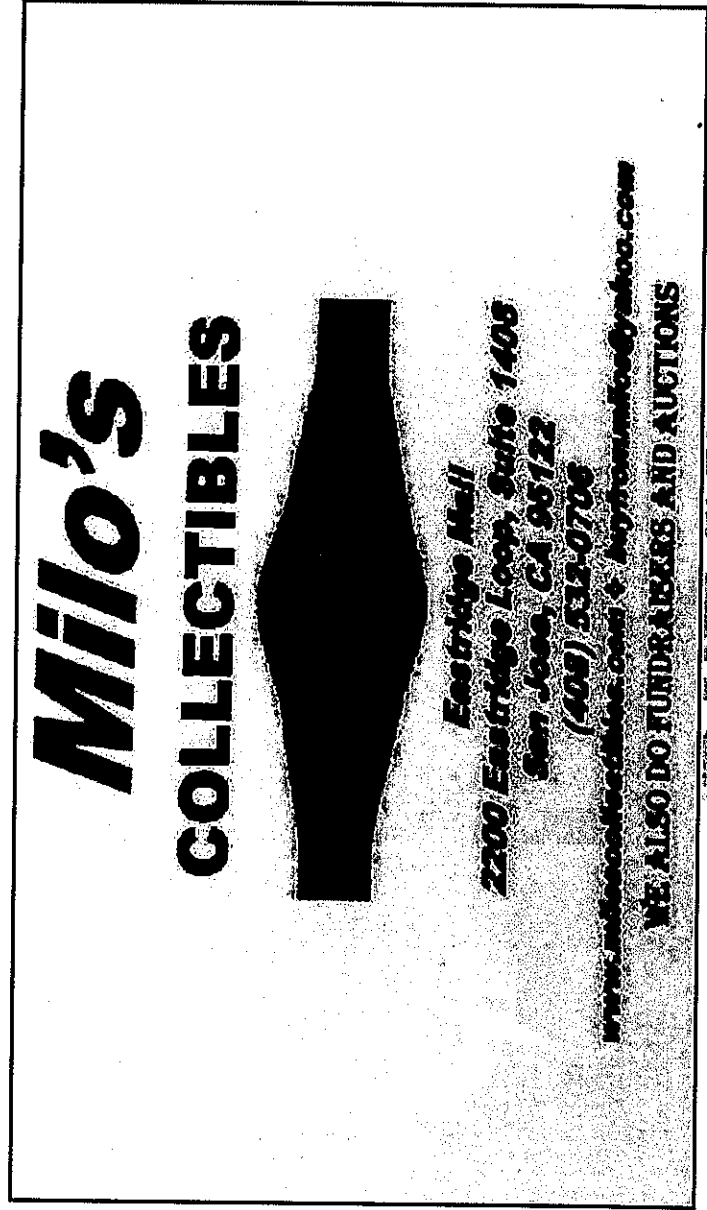
Server's address

Additional information regarding attempted service, etc:

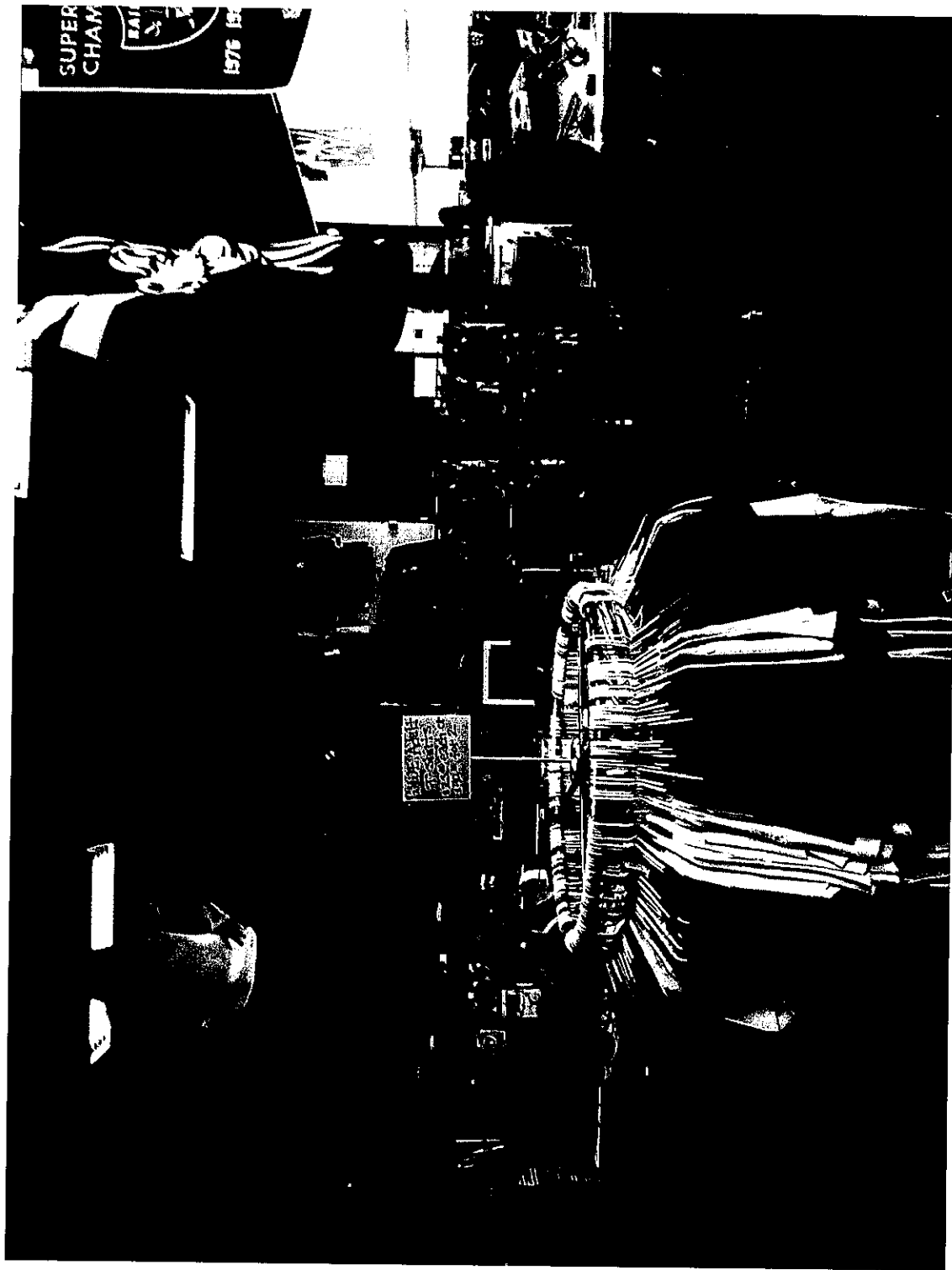
EXHIBIT 2

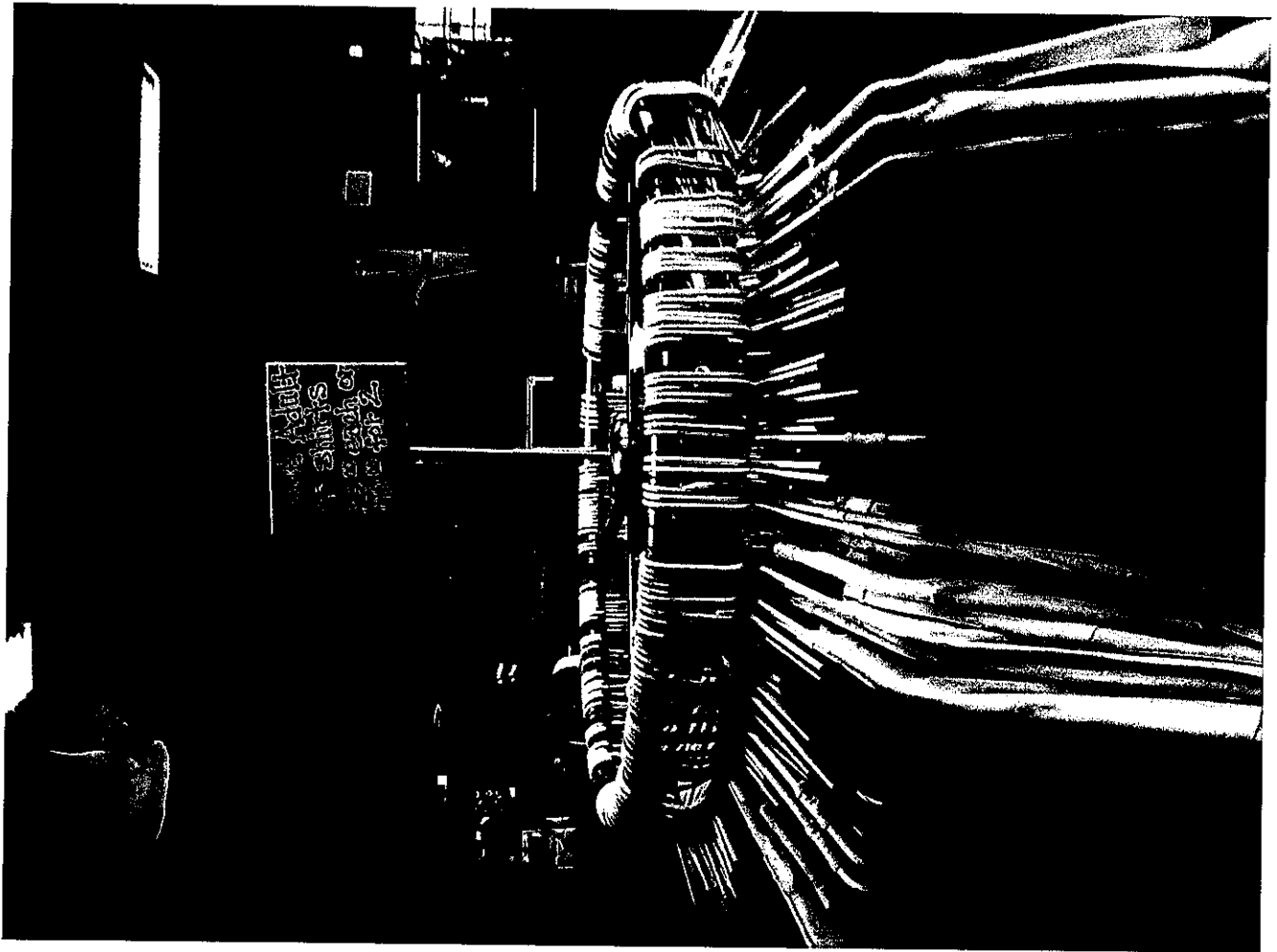
EXHIBIT 2

In February 2015, WWE was contacted by the Department of Homeland Security, San Jose office regarding a store in the a mall in San Jose, CA. The owner of this store was selling a volume of merchandise that DHS believed to be counterfeit, including NFL, MLB, NBA and WWE product. The owner of this store was also working with a third party wrestling promotion that follows WWE shows to sell product nearby. WWE worked with DHS to identify which items were indeed WWE counterfeit product, including the use of our intellectual property on their actual business cards:



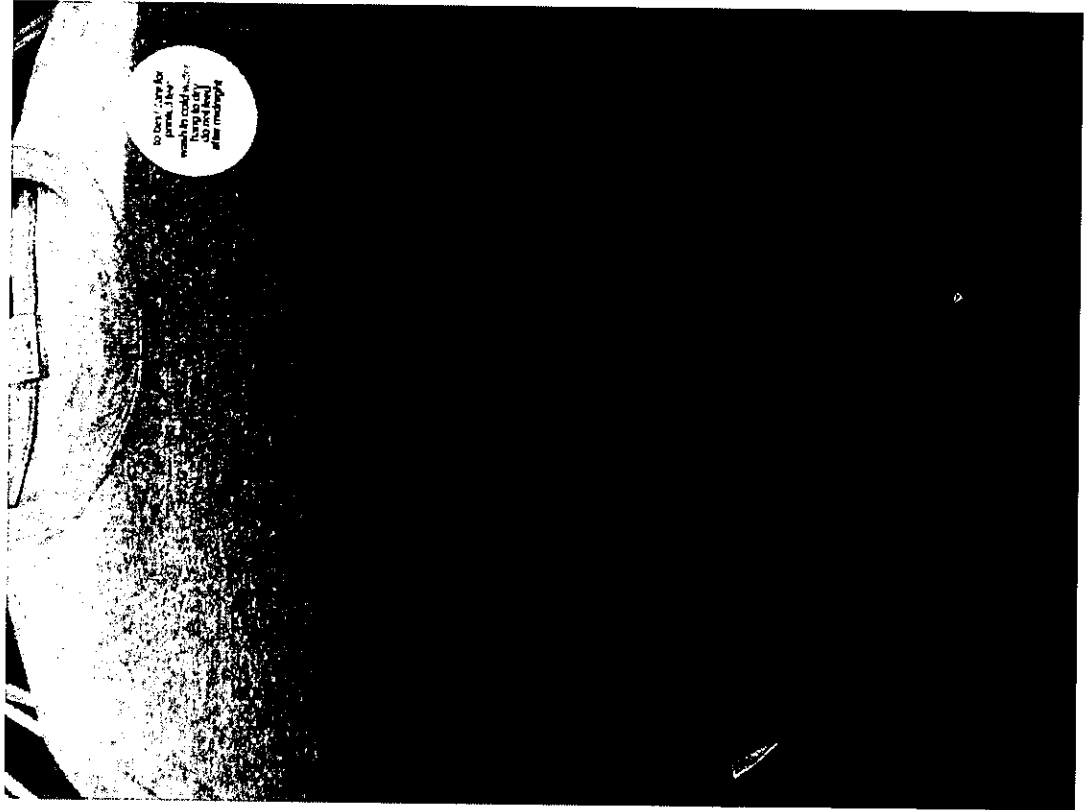
On Wednesday, March 25th, DHS raided Milo's Collectibles in San Jose, CA (this action was not under WWE's TRO, but rather pursuant to a search warrant obtained by DHS - lots of WWE intellectual property present):





DHS seized more than 60 counterfeit WWE shirts containing the following six designs (selling for \$25 each / 2 for \$40):

#1



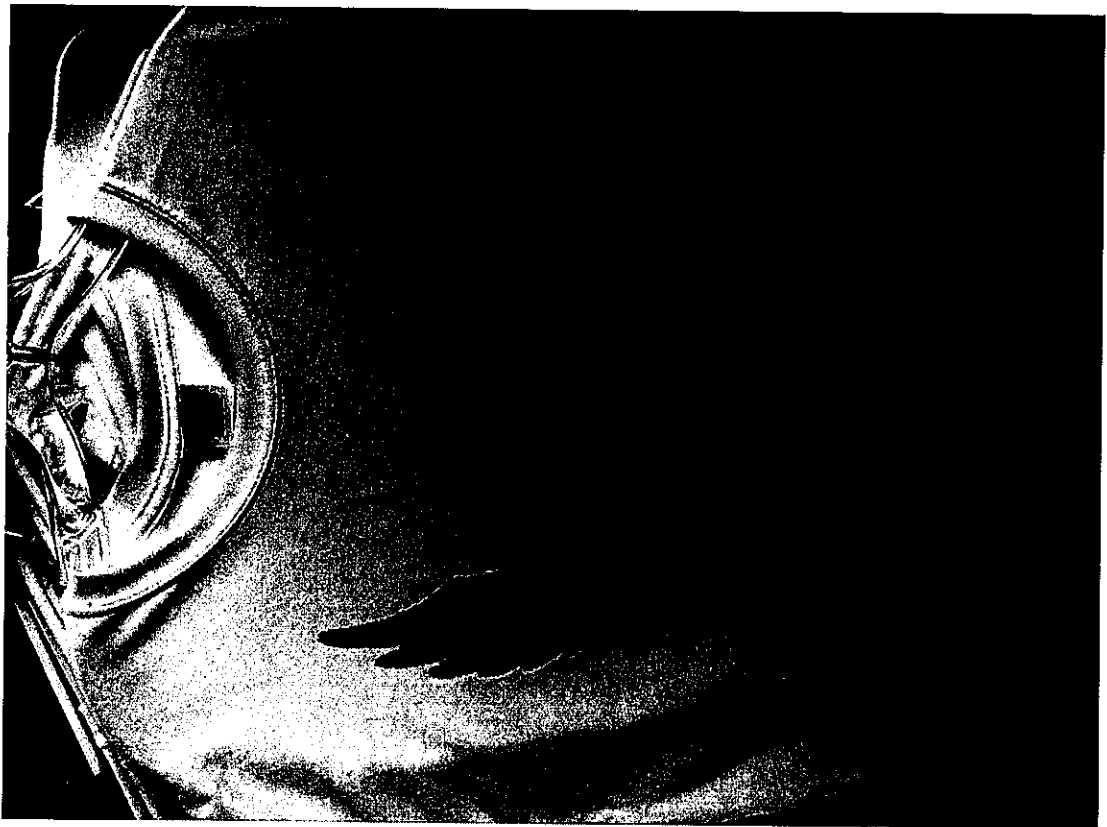
#2



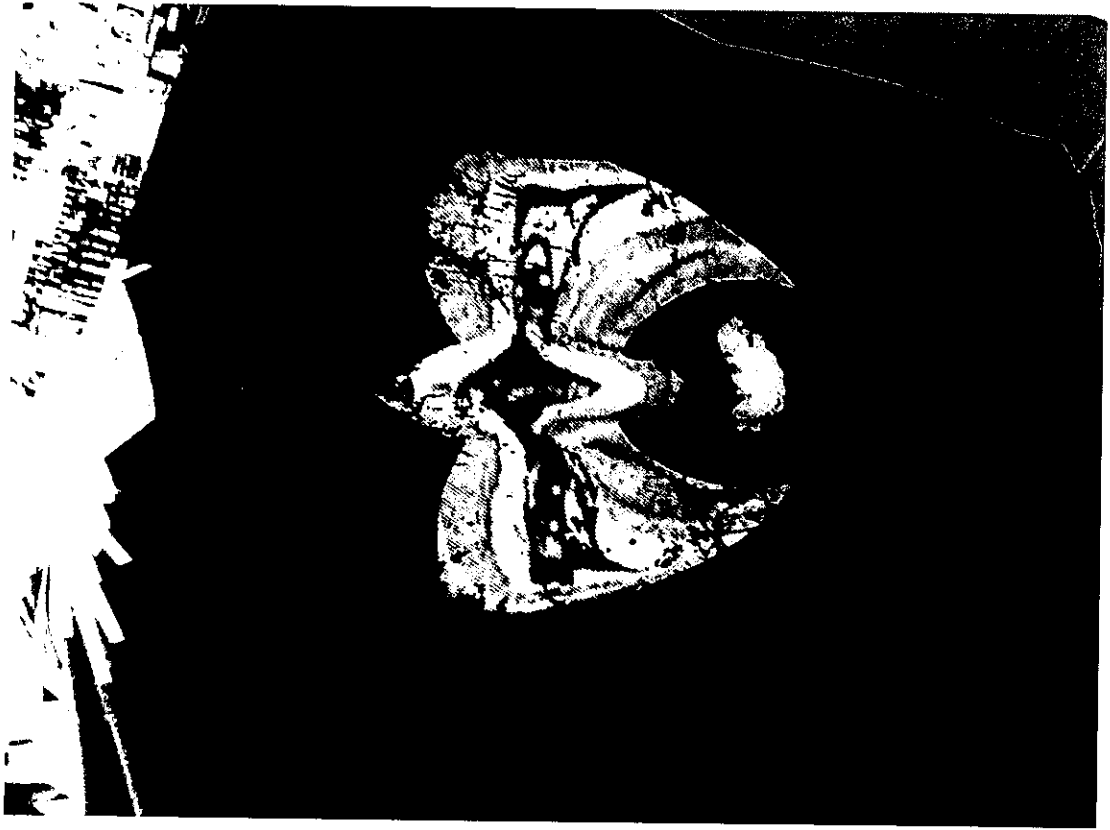
#4



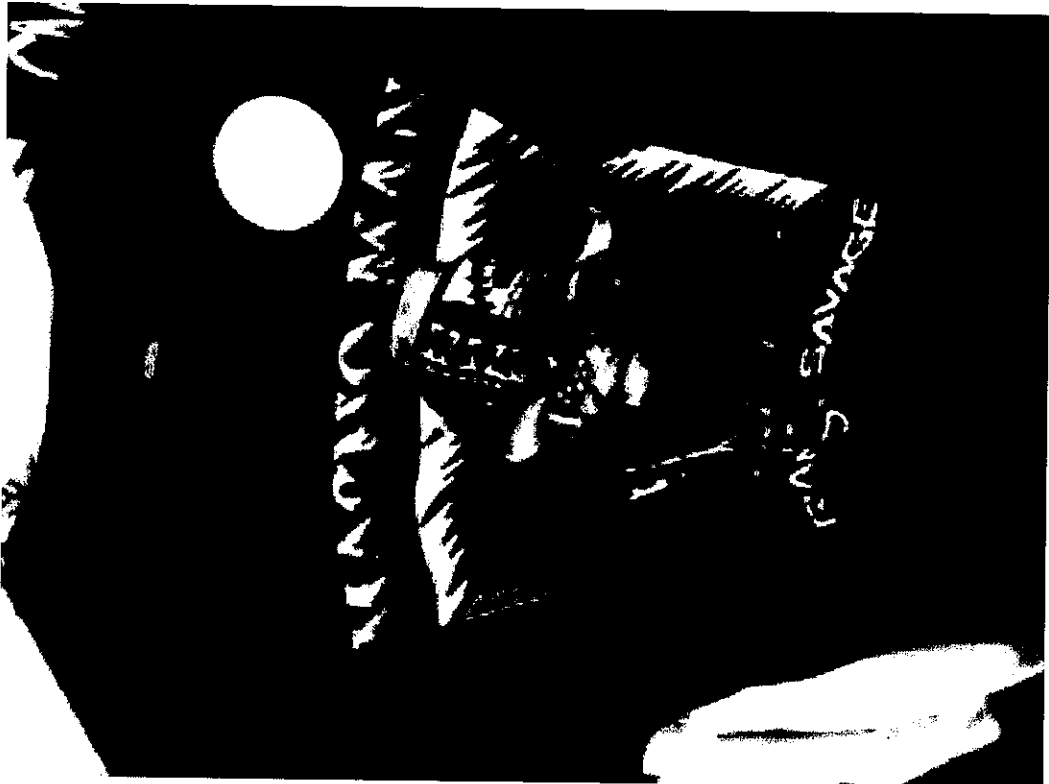
#3



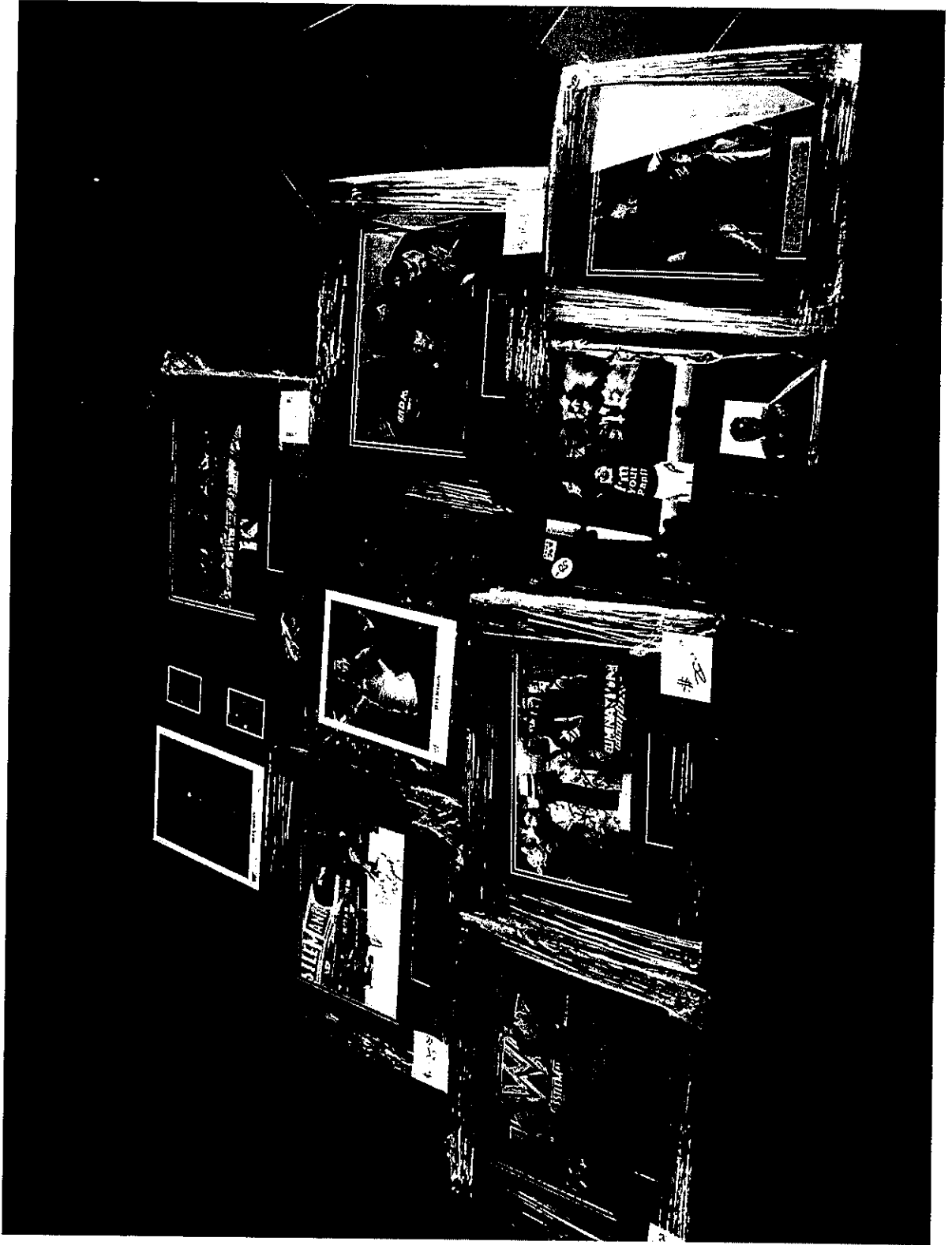
#6

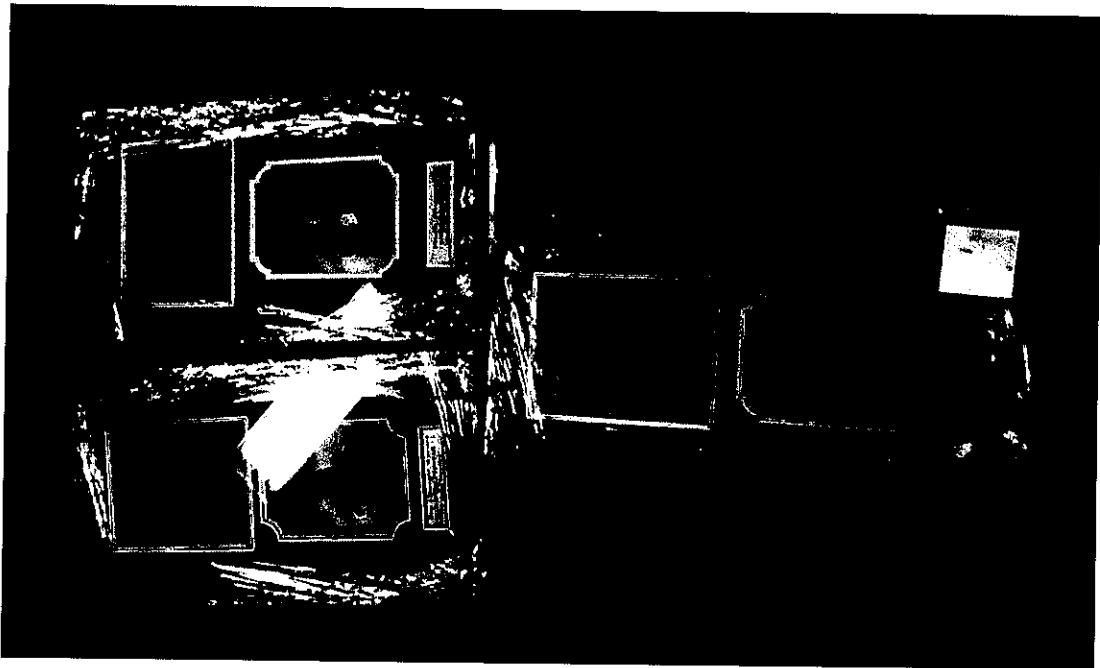


#5



**DHS also seized more than 15 counterfeit WWE plaques
(worth approx. \$150 each):**

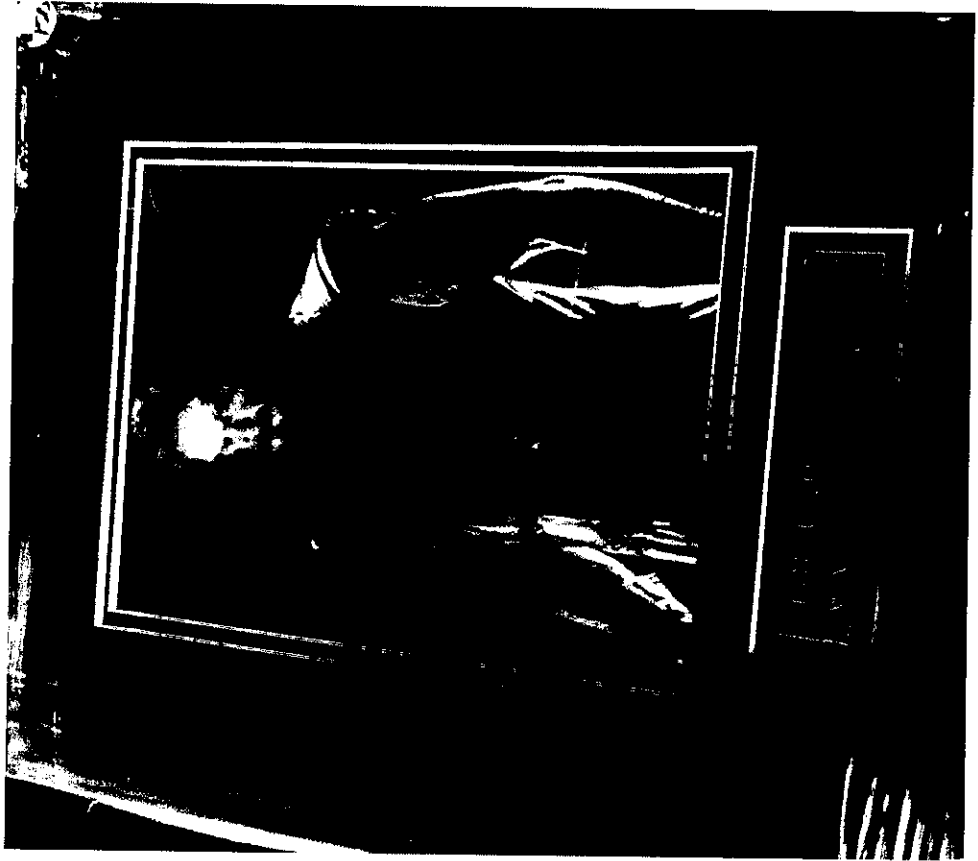
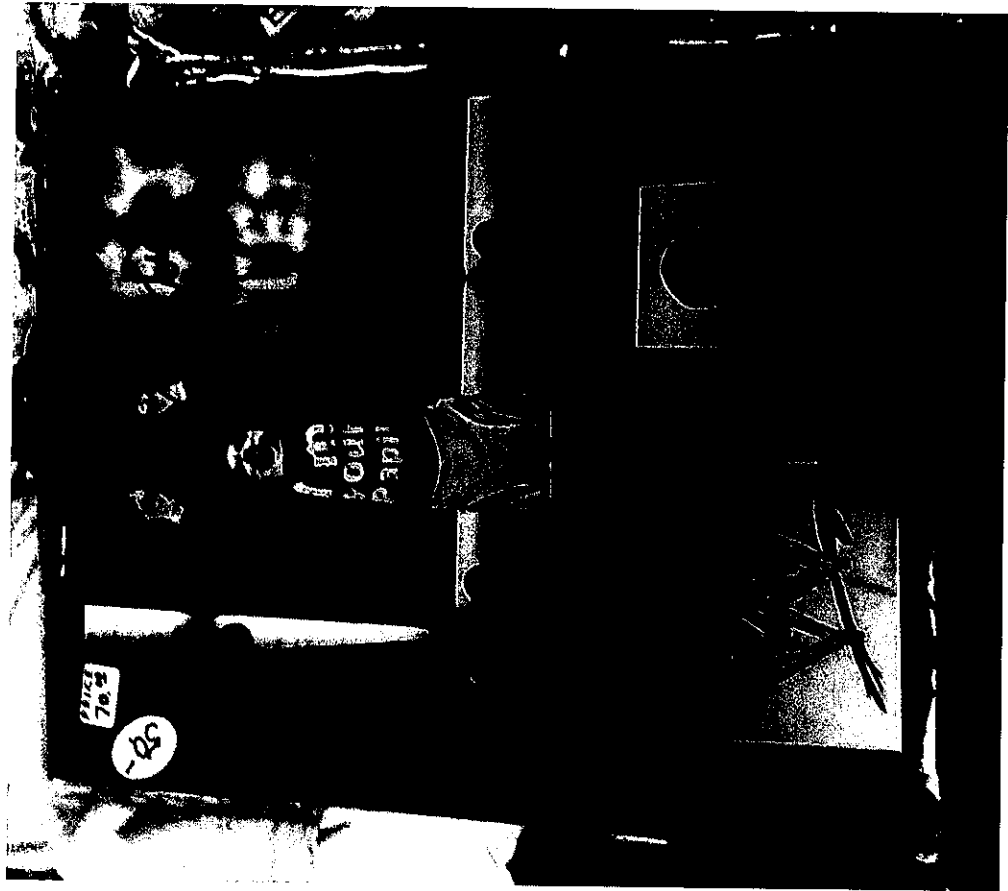




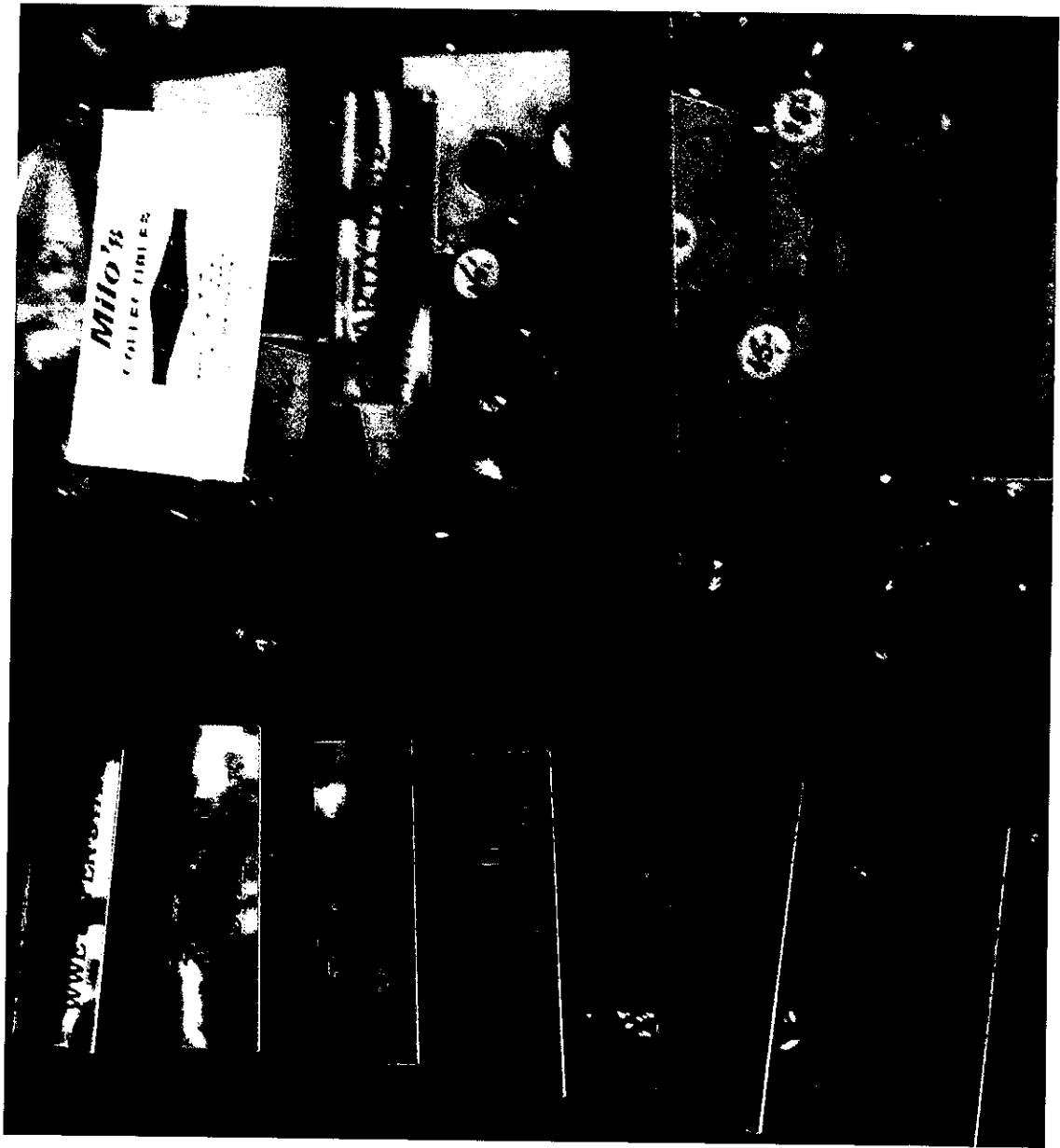
**Additional counterfeit WWE
plaques seized:**



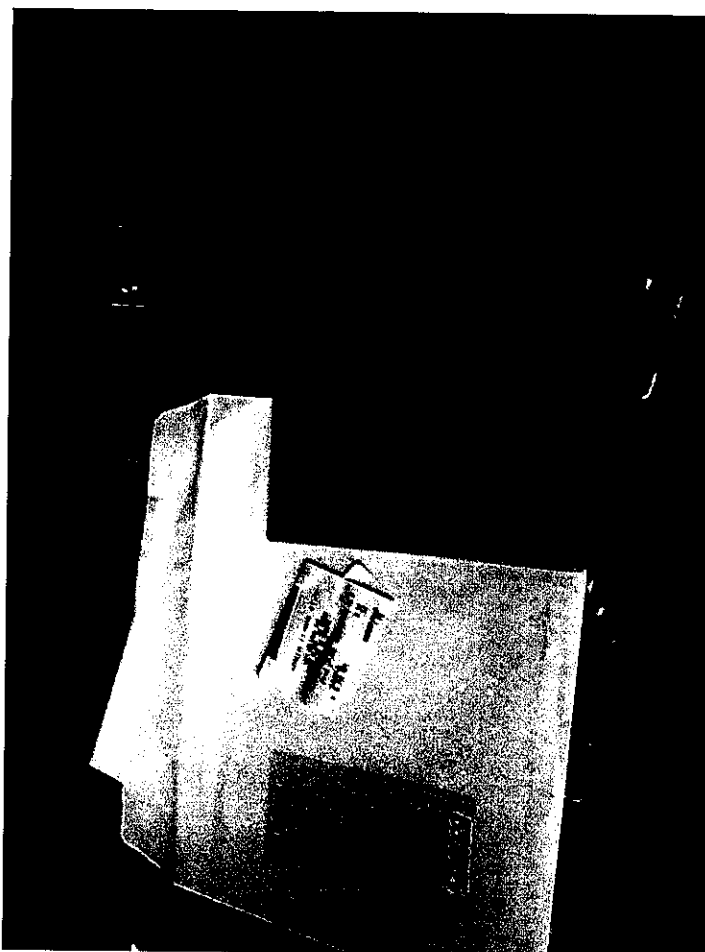
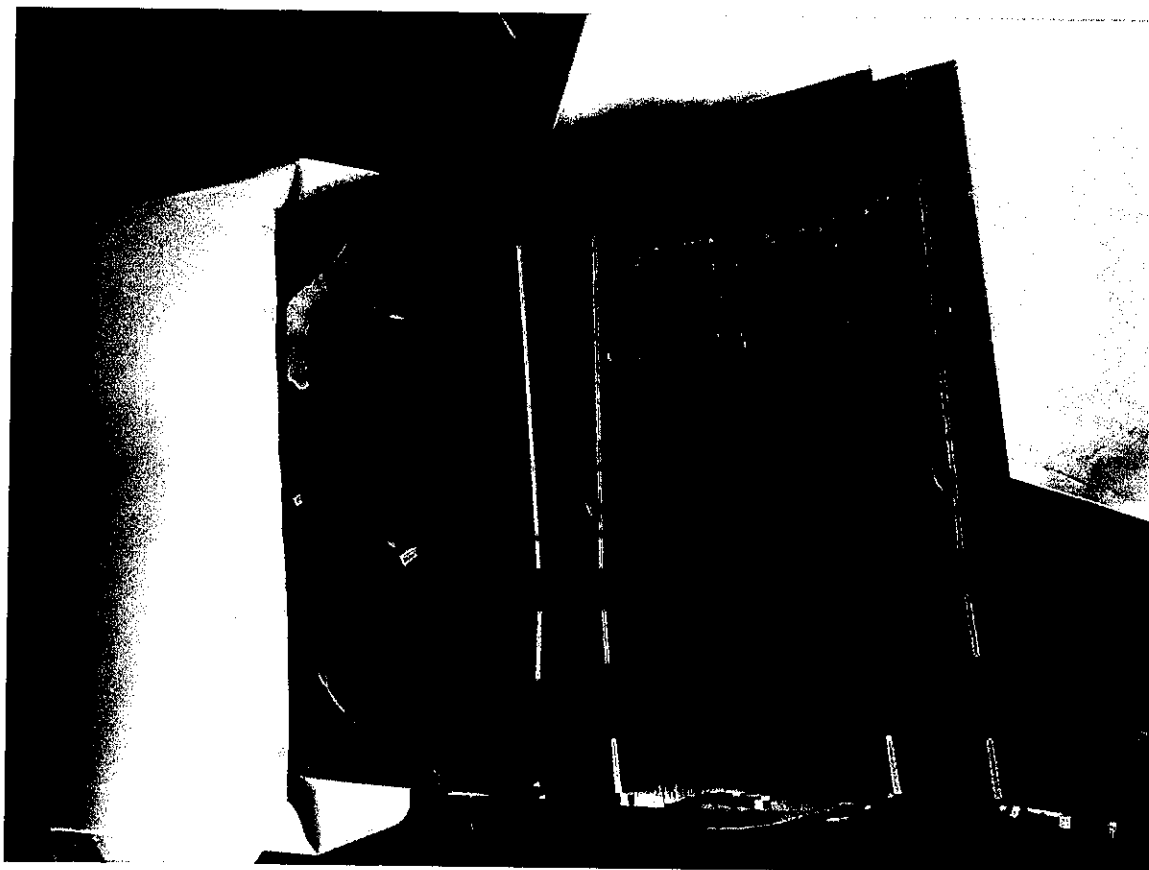
Additional counterfeit WWE plaques seized:



Counterfeit WWE nameplates seized:

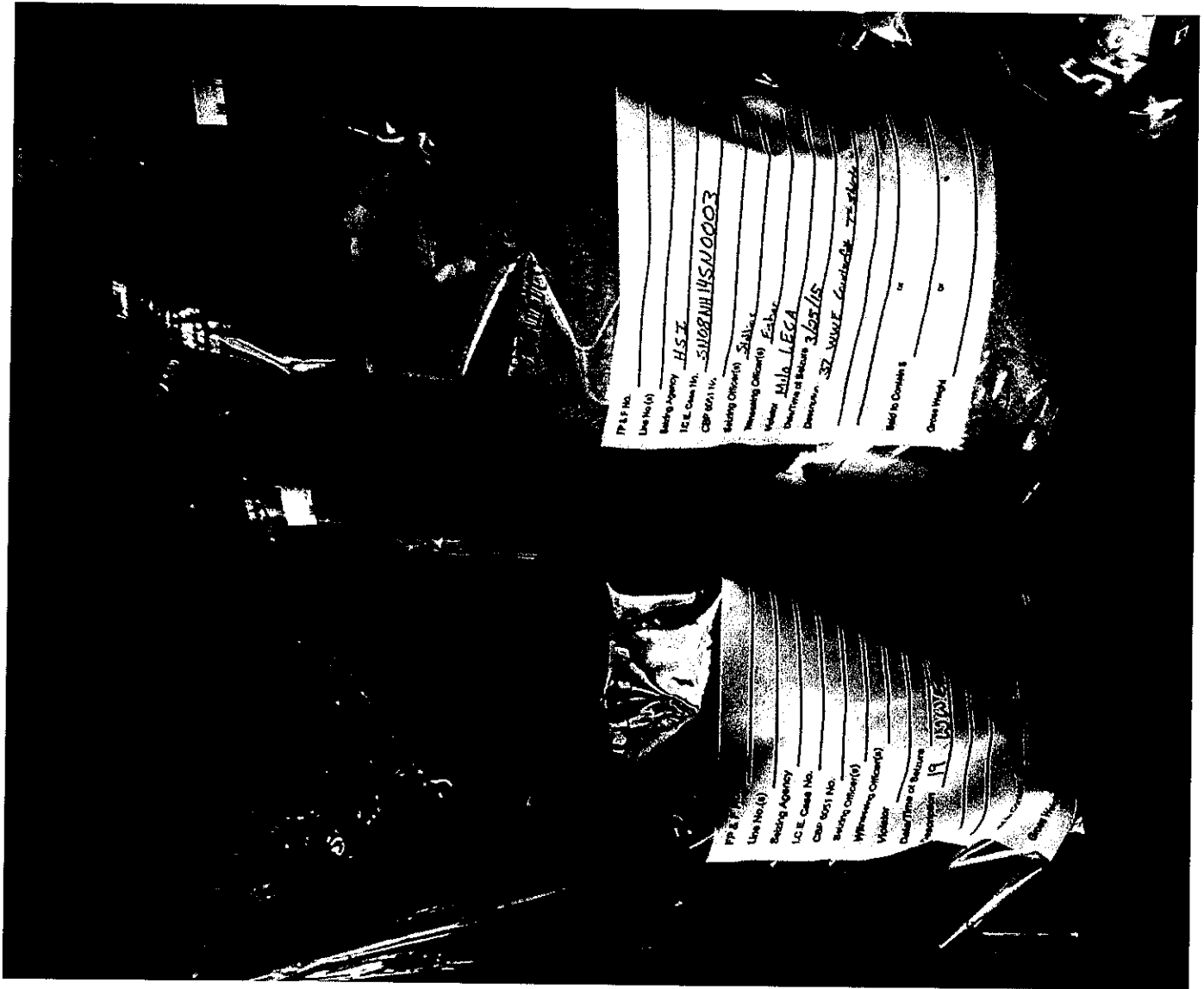


The owner of the store admitted to making unauthorized copies of WWE copyrighted photos:



DHS ended up seizing approximately \$3800 worth of counterfeit WWE product:





PP & P No. _____
 Line No.(s) _____
 Sealing Agency H.S.Z.
 I.C.E. Case No. _____
 CBP 5051 No. SINOBIH 185M0003
 Sealing Officer(s) SIN...
 Witness Officer(s) LE...
 Name MILIA I.E.G.A.
 Date/Time of Seizure 3/03/15
 Description 37 VALUE CONTAINER - 75g/100g
 Bid to Contain \$ _____
 Gross Weight _____

PP & P No. _____
 Line No.(s) _____
 Sealing Agency _____
 I.C.E. Case No. _____
 CBP 5051 No. _____
 Sealing Officer(s) _____
 Witness Officer(s) _____
 Name _____
 Date/Time of Seizure 19 18:00
 Bid to Contain \$ _____
 Gross Weight _____

DEPARTMENT OF HOMELAND SECURITY
**CUSTODY RECEIPT for
 SEIZED PROPERTY and EVIDENCE**

No. 6035804

Handbook 5200-08

1. IFF No. 20150802020101

2. Incident No. 20150802020101

3. Investigation Case No. 20150802020101

4. Evidence No. 03/25/2015

5. Prior Detention? Yes No

6. Date Seized (mm/dd/yyyy) 03/25/2015

7. Time Seized (hr:24 hr) 11:00 AM

8. FBI/ALSOIC

9. Seized From: MILD LACA

10. Entry No.

11. Seal or Other ID Nos.

12. Remarks:

Name: 2200 EASTRIDGE LOOP # 1408

Address: SAN JOSE CA 95122

Telephone No. 408 532 0706 Ext.

13. Send Correspondence to:

14. PROPERTY (By Line Item) Attach DHS Form 58 if conveyance

a. Line Item No.	b. Description	c. Packages Number	d. Measurements Type Qty. UM	e. Est. Dom. Value
1	Counterfeit WINE T-shirts		37 ea	\$ 1110
2	Counterfeit WINE Plaques		9	\$ 1350
3	Counterfeit WINE SHIRTS		3	\$ 600
4	Counterfeit WINE Nameplates		11	\$ 55
5	Business Cards Bearing unauthorised WINE trademark		11	\$ 1
6	Counterfeit WINE Mini Plaque		8	\$ 120

15. Seizing Officer: J Stebbins

Signature: [Signature]

Date: 3/25/15

16. ACCEPTANCE / CHAIN OF CUSTODY

a. Line Item No.	b. Description	c. Print Name/Title/Organization	d. Signature	e. Date

DHS Form 6051A Continuation Sheet Attached? Yes No

DHS retains original

Previous editions are obsolete

DEPARTMENT OF THE TREASURY
 UNITED STATES CUSTOMS SERVICE
CUSTODY RECEIPT FOR RETAINED OR SEIZED PROPERTY
 CONTINUATION SHEET

SN08NH14SN0003

2034

2015 2034 0000 21 01

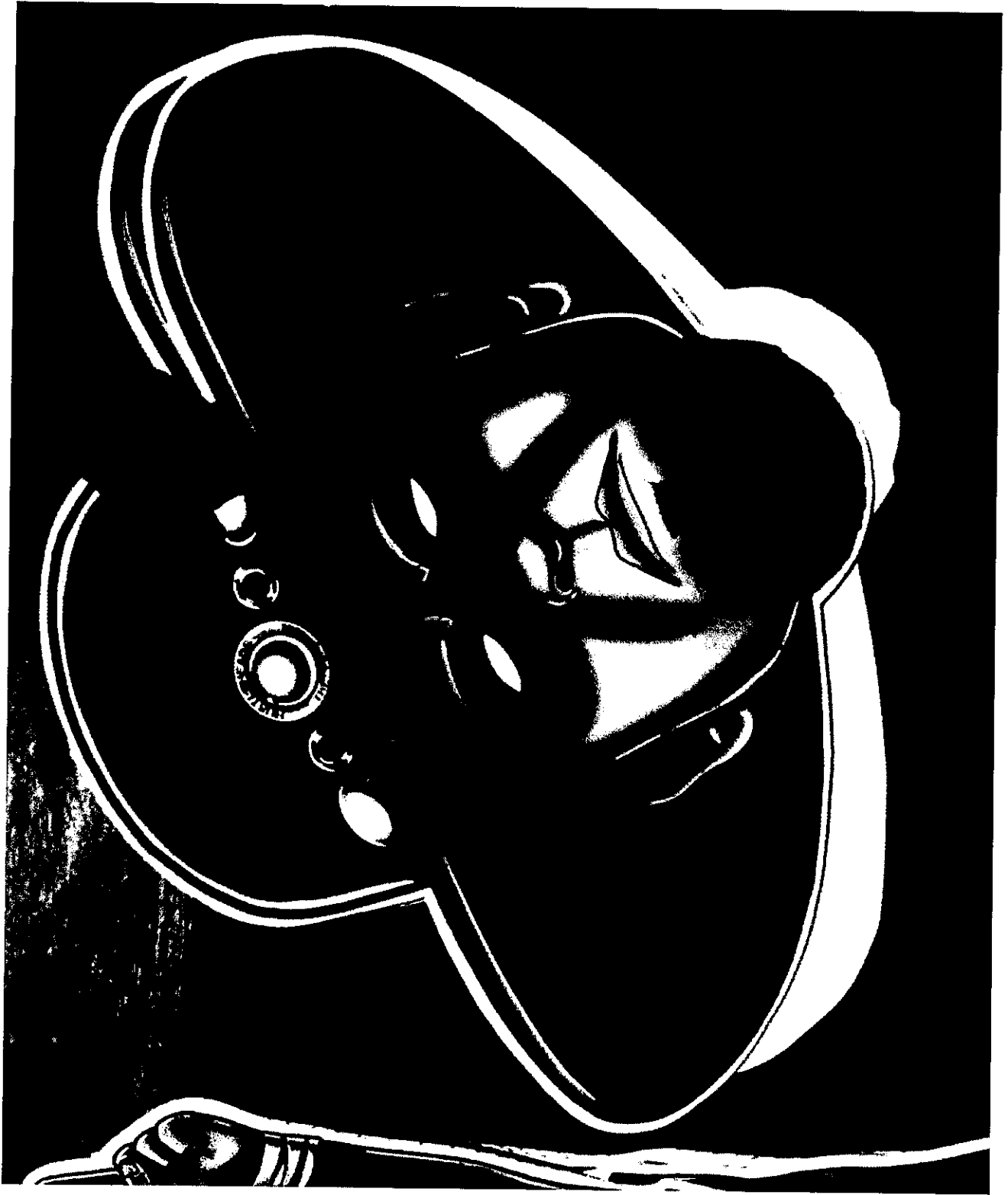
6035804

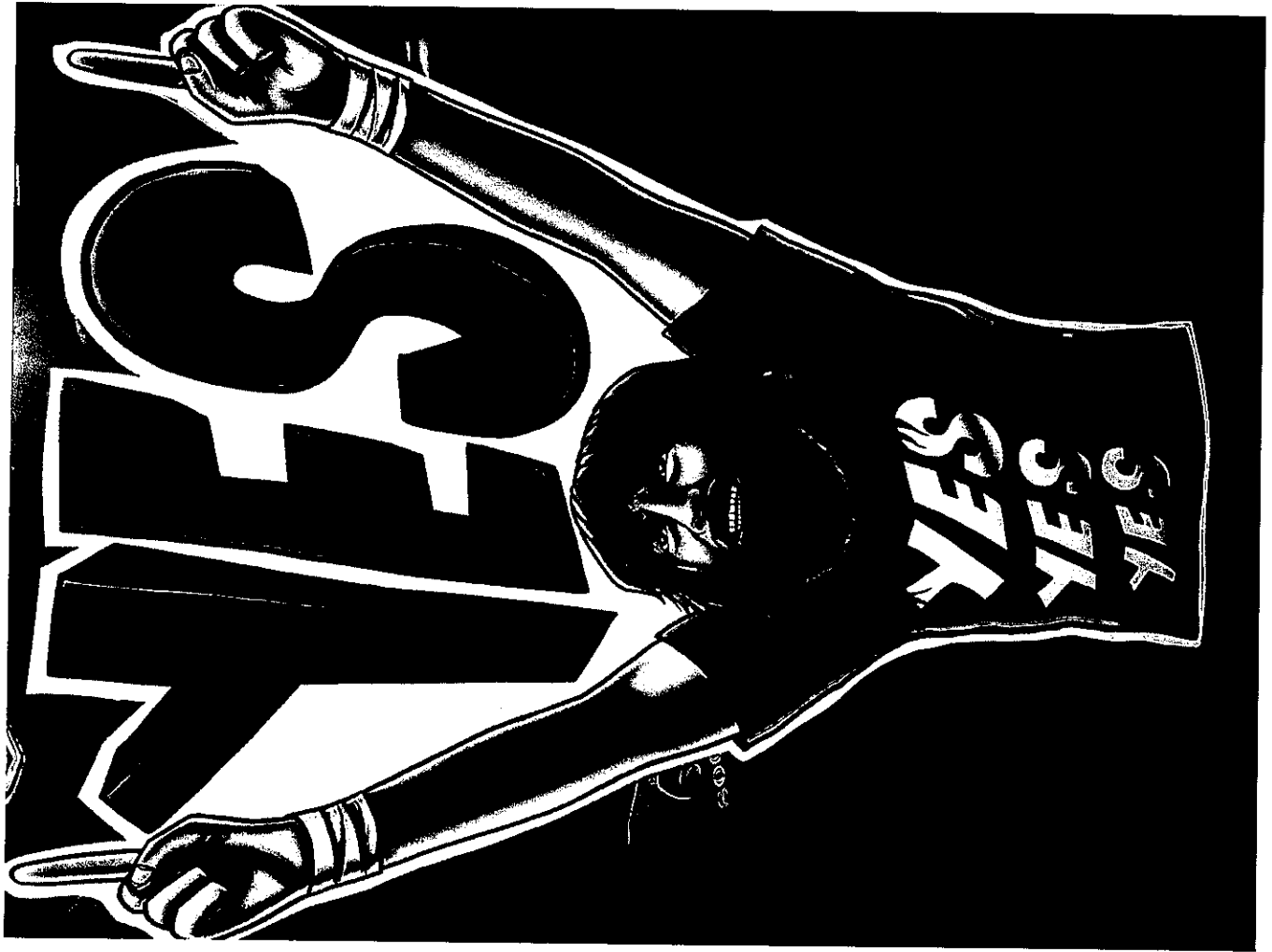
1. IFF No.	2. PROPERTY (By Line Item) Attach Form 58 if conveyance.	3. SEIZURE No.	4. OTHER CONTROL No.	5. DATE RECEIVED
7	Wine Counterfeit WINE T-shirts		24	42
8	Counterfeit NFL Jerseys		30	5,100
9	Counterfeit NFL Patches		8	480
10	Counterfeit NBA Jerseys		18	1800
11	Counterfeit MLB Jerseys		20	3400
12	Counterfeit NHL Jerseys		6	1,200
13	Counterfeit NHL SWEATSHIRTS		3	150
14	Counterfeit MLB Patches		33	495
15	Counterfeit NFL Patches		55	825
16	Counterfeit NHL Patches		2	30
17	Counterfeit NBA Patches		1	15
18	Counterfeit NFL HATS		12	420
19	Counterfeit MLB HAT		1	35
20	Counterfeit MLB RING		1	40
21	Counterfeit NFL RINGS		7	280
22	Counterfeit NFL Beanies		20	500
23	Counterfeit NBA Beanies		2	50
24	Counterfeit MLB Beanies		4	100
25	Counterfeit NHL Beanies		10	250
26	Wine Counterfeit WINE Trade mark		1	1
27	Counterfeit NFL Jerseys		22	3,740
28	Counterfeit WINE T-shirts		19	510
29	Counterfeit MLB Jerseys		9	1,530

On Saturday, March, 28th, while fans lined up to enter the WWE Hall of Fame event, DHS discovered three Bootleggers selling counterfeit WWE cardboard signs to fans as they waited on line:

DHS seized this counterfeit product and served the three defendants...







VENUE ENFORCEMENT REPORT

Date of Event: 3-28-15

Event Venue: SAP CENTER

Name of Defendant Served: Benjamin Adham Pechetti

Address of Defendant Served: 1284 ONDSTAD DRIVE
REDWOOD CITY, CA 94063

Time Defendant Served: 1530 hrs

Type of Merchandise Seized: Cardboard photo's

Quantity of Merchandise Seized: 18

Approx. Height of Defendant: 6'1

Approx. Weight of Defendant: 220

Ethnicity of Defendant: w/m

Law enforcement involvement: Homeland Security Investigation (HSI)

AO 146 (Rev. 06/12) Summons in Civil Action (Page 2)
Civil Action No. 15-cv-01263-VC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (f))

This summons for (name of individual and title, if any) Benjamin Adham Pechetti
was received by me on (date) 3-28-15

- I personally served the summons on the individual at (place) SAP CENTER on CAWTHORN ST. on (date) 3-28-15; or
- I left the summons at the individual's residence or usual place of abode with (name) _____, a person of suitable age and discretion who resides there, on (date) _____, and mailed a copy to the individual's last known address; or
- I served the summons on (name of individual) _____, who is designated by law to accept service of process on behalf of (name of organization) _____ on (date) _____; or
- I returned the summons unexecuted because _____; or
- Other (specify): _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00

I declare under penalty of perjury that this information is true.

Date: 3-28-15

[Signature] Server's signature

TOAD S. SUBRAJESWARAN Printed name and title

200 S. FIRST ST., SUITE 170 Server's address
SAN JOSE, CA 95113

Additional information regarding attempted service, etc:

VENUE ENFORCEMENT REPORT

Date of Event: 3-28-15

Event Venue: SAP CENTER

Name of Defendant Served: Dommas Angel Rodriguez

Address of Defendant Served:
3015 E. Bayshore Rd. Ste. 202
Redwood City, CA 94063

Time Defendant Served: 3:20 pm

Type of Merchandise Seized: "Fat Heads"

Quantity of Merchandise Seized: 2

Approx. Height of Defendant: 5'7"

Approx. Weight of Defendant: 170 lbs

Ethnicity of Defendant: w

Law enforcement involvement: HSI Seizure

AO 140 (Rev. 04/02) Summons in a Civil Action (Page 2)
 Civil Action No. 15-cv-01263-VC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (f))

This summons for (name of individual and title, if any) Dommas Angel Rodriguez
 was received by me on (date) 3/28/15

I personally served the summons on the individual at (place) SAP Center on Robinson St.
 on (date) 3/28/15; or

I left the summons at the individual's residence or usual place of abode with (name) _____, a person of suitable age and discretion who resides there,
 on (date) _____, and mailed a copy to the individual's last known address at _____

I served the summons on (name of individual) _____, who is
 designated by law to accept service of process on behalf of (name of organization) _____, on (date) _____; or

I returned the summons unexecuted because _____; or

Other (specify): _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00

I declare under penalty of perjury that this information is true.

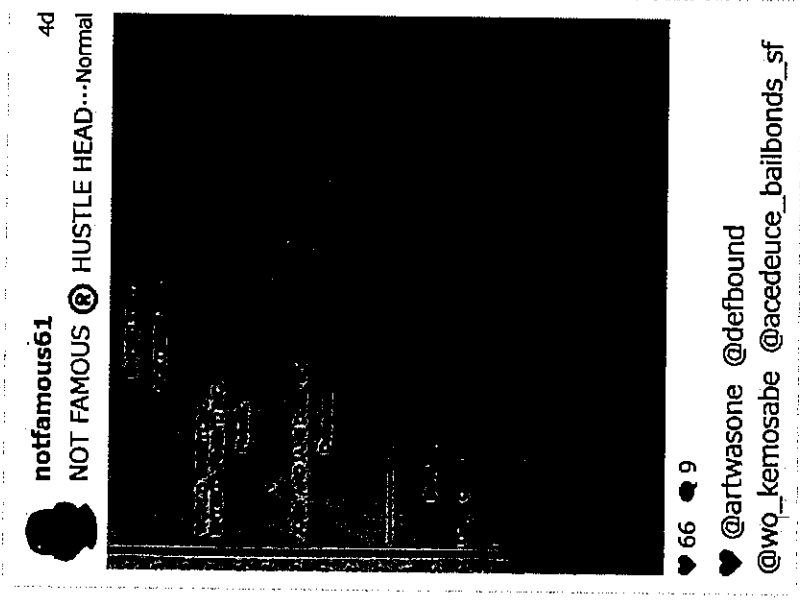
Date: 3/28/15 _____
 Server's signature

Todd Schorling
 Printed Name and Title

240 S. First St, Ste 120
San Jose, CA 95113
 Server's address

Additional information regarding attempted service, etc:

One of the bootleggers we served during the WWE Hall of Fame (selling counterfeit WWE cardboard signs) later thanked us through Instagram for the way in which WWE and DHS conducted the seizure and for the explanations we provided...



notfamous61 YOUR NOT DOING IT RIGHT UNTIL YOU GET ONE OF THESE.. SHOUT OUT TO WWE LEGAL TEAM AND HOMELAND SECURITY FOR BEING HELLA COOL AND SUPPORTING #HUSTLEMANIA !! THANKS FOR THE ADVICE !
4d



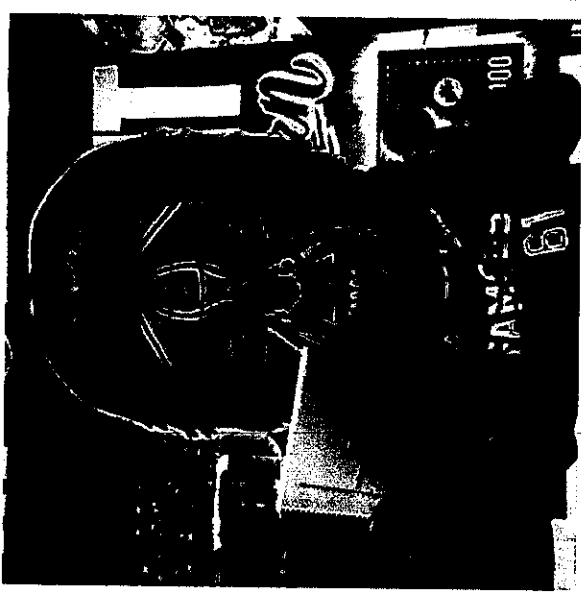
1 more comments:

- vooodoobeoyfresh61** #truestory 4d
- big_pat_925** Damn already?!?! 4d
- big_pat_925** @notfamous61 4d
- _jay.gun_** Lmao ICE again?!? 4d
- squiebe** Homeland Security has nothing better to do? Really... 4d
- acedeuce_bailbonds_sf** Come back with reinforcements 2morrow! #NinjaStyle 4d
- notfamous61** #HUSTLEHEADS #DOMORE 4d
- fresnoali** @409impala 2d

» LOG IN to write comment.



notfamous61
NOT FAMOUS [®] HUSTLE HEAD...Normal
4d



69 5
@takervip @voodoodepeboyfresh61
@j_bert8 @starcitygraphics

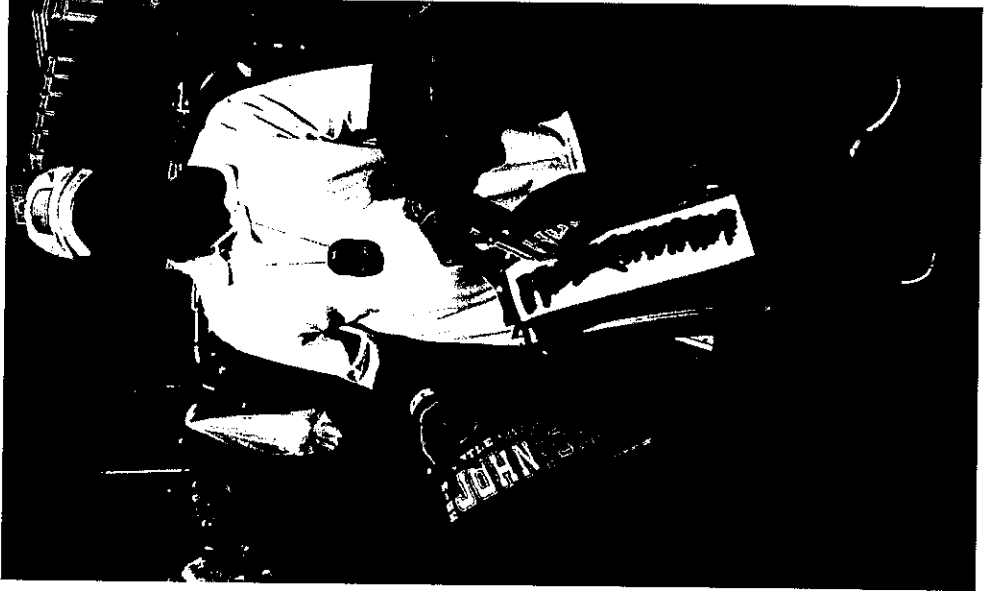
- notfamous61 You Just Got Served !
Everything went great at the WWE Hall of Fame ! We had a minor issue with Law Enforcement. But thankfully they all Loved HustleHeads !!! SEE YOU GUYS TOMORROW AT #WRESTLEMANIA !!! 4d
- big_pat_925 Did u take Macho mans out to the shark tank?
@notfamous61 4d
- notfamous61 Yes @big_pat_925 they made me leave and confiscated a few 4d
- big_pat_925 Aww damn!! Were u at least able to off some before Johnny law gave u the boot? @notfamous61 4d
- notfamous61 Kinda @big_pat_925 4d
- big_pat_925 Oh ok. I'll see u tomorrow at mania bro!
@notfamous61 4d

» LOG IN to write comment.



On Sunday, March 29th, while fans were tailgating in the parking lot of Levi Stadium, waiting for WrestleMania 31 to begin, DHS discovered bootleggers selling counterfeit WWE cloth pennants to fans in the parking lots:

DHS seized this counterfeit product and served the defendant...





VENUE ENFORCEMENT REPORT

Date of Event: 3/24/2015

Event Venue: Levi's Stadium

Name of Defendant Served: Ibrahim Nimex Shihabber

Address of Defendant Served: 377 Skyline
Daly City, CA 94133

Time Defendant Served: 12:40

Type of Merchandise Seized: Flags/Towels

Quantity of Merchandise Seized: 62

Approx. Height of Defendant: 5'7"

Approx. Weight of Defendant: 160 lbs.

Ethnicity of Defendant: W

Law enforcement involvement: HSI Suzume

AO 140 (Rev. 06/73) Summons in a Civil Action (Page 2)
Civil Action No. 15-cv-01263-VC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4(f))

This summons for (name of individual and title, if any) Abraham Nimex Shihabber
was received by me on (date) 3/24/2015.

I personally served the summons on the individual at (place) Levi's Stadium
Green Lot 1 (Sunshine Terrace) on (date) 3/24/2015; or

I left the summons at the individual's residence or usual place of abode with (name)
(name), a person of suitable age and discretion who resides there;

I served the summons on (name of individual), who is
designated by law to accept service of process on behalf of (name of organization)

I returned the summons unexecuted because _____; or
 Other (specify): _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

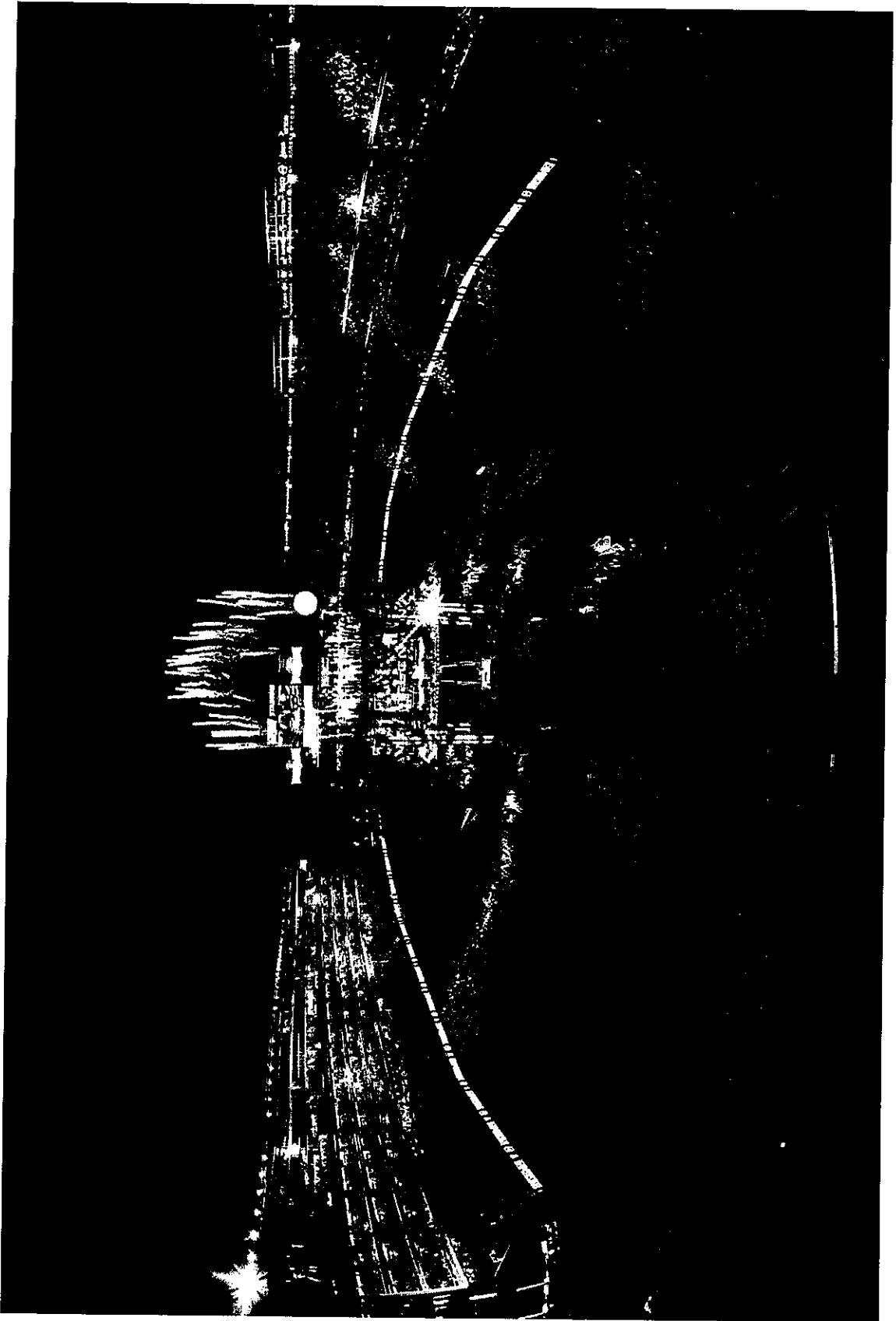
Date: 3/24/15
Ali J. Jang Server's signature
Ali J. Jang Server's name and title
290 S. First St.
Santa Ana
San Diego, CA 92113 Server's address

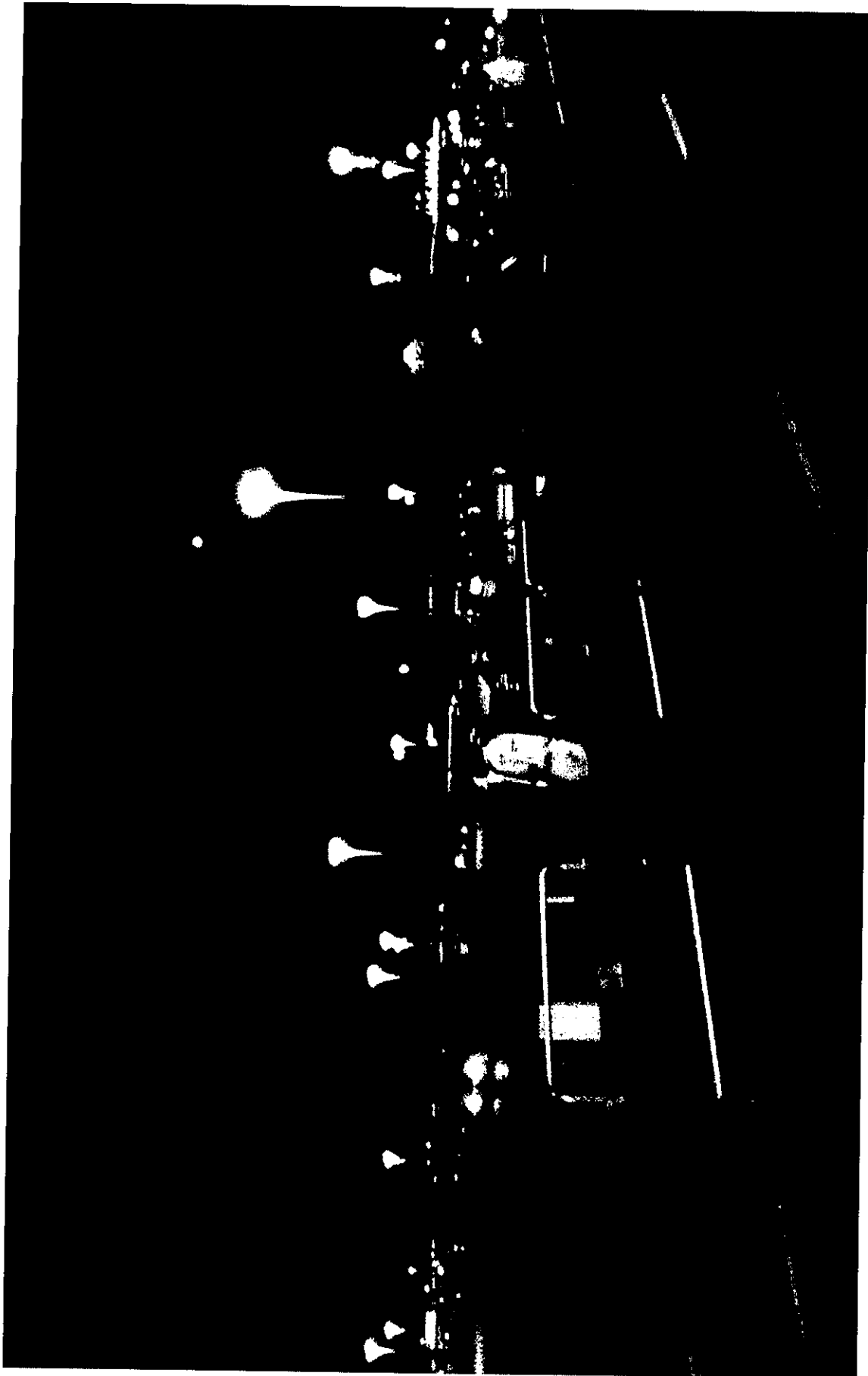
Additional information regarding attempted service, etc:

Police presence was strong throughout the WrestleMania week of events, driving counterfeiters away:

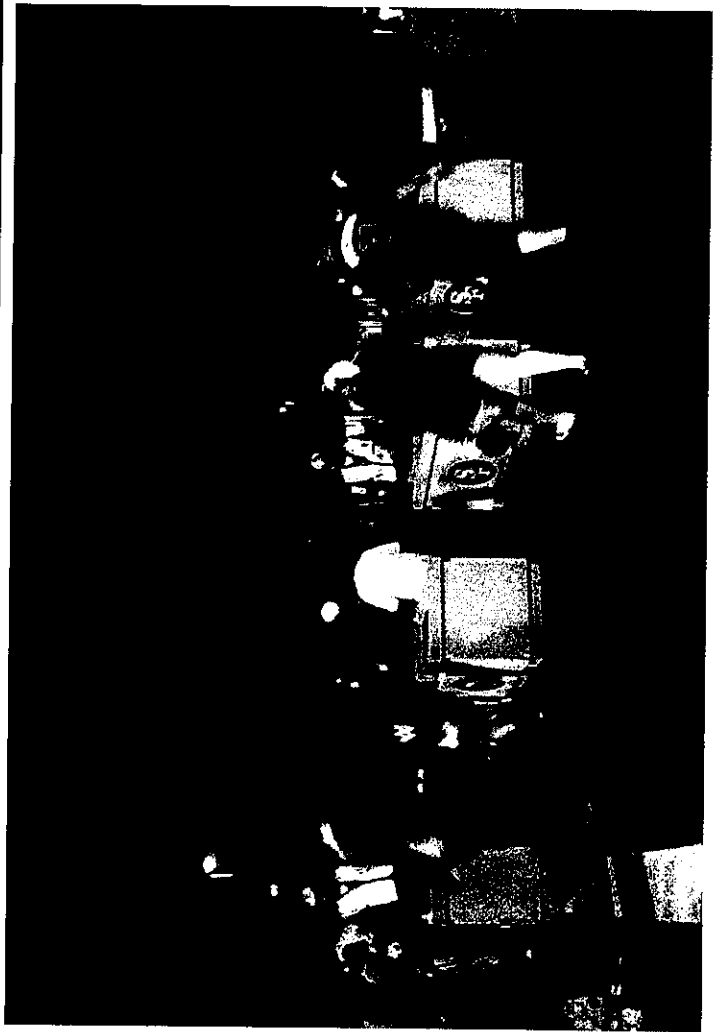
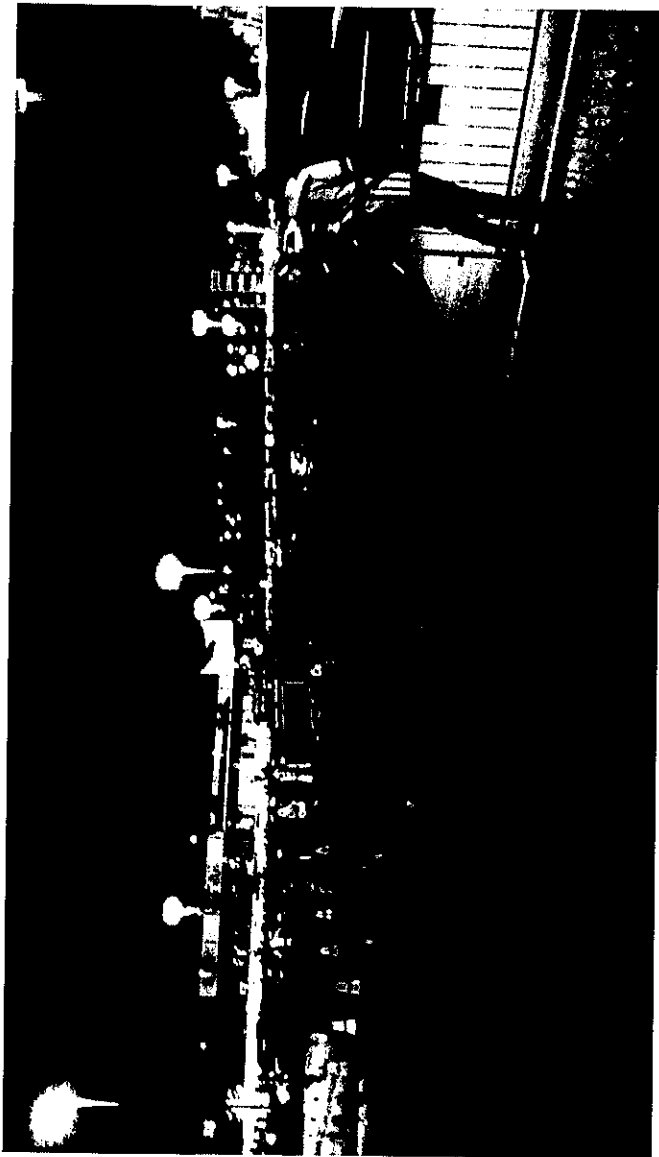


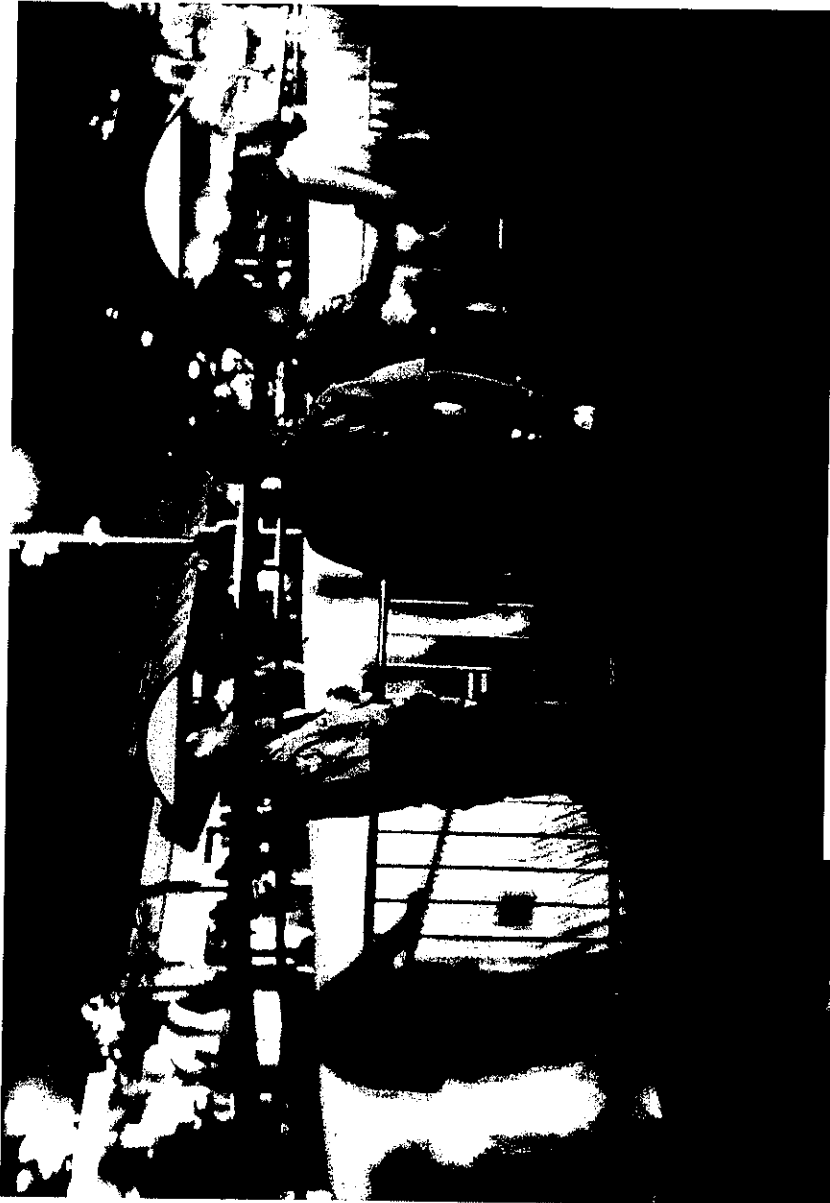
Security inside the stadium was abundant:







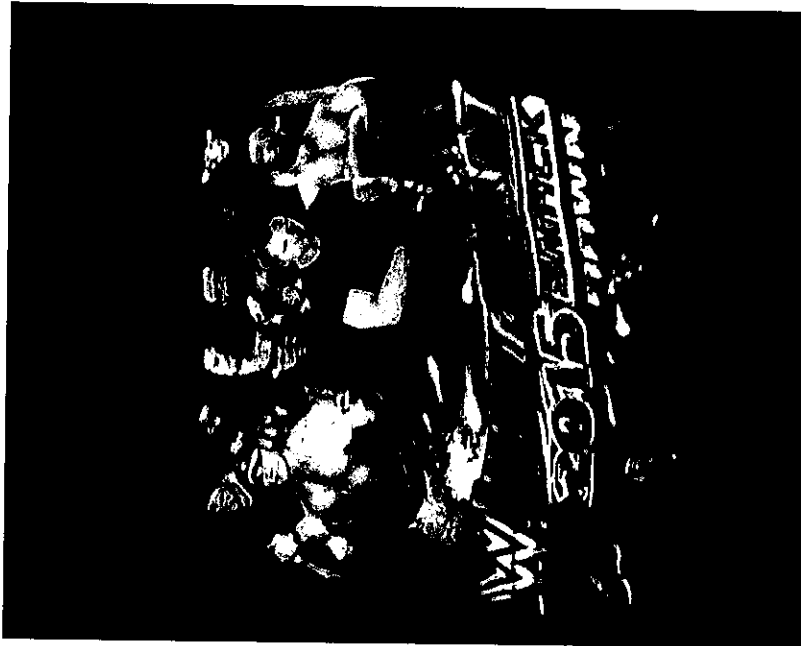




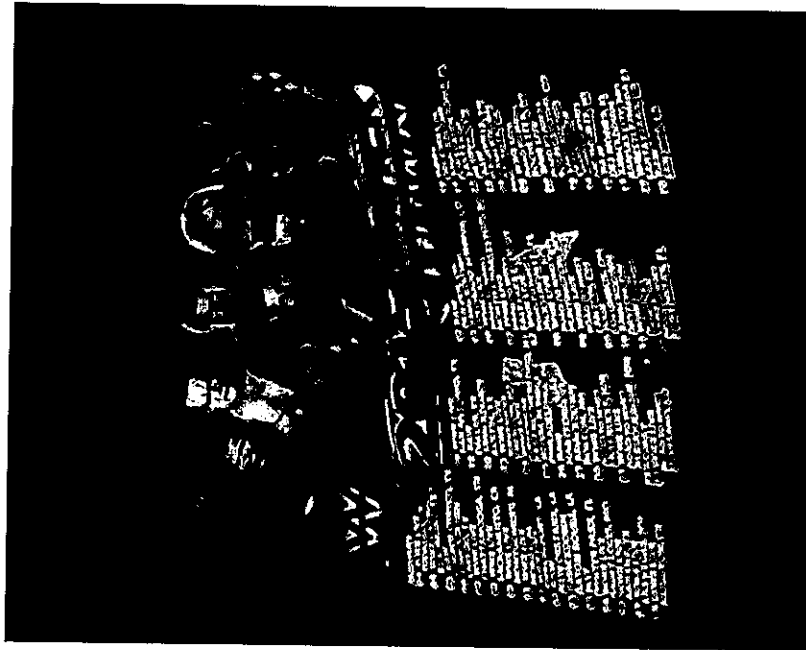
Nevertheless, we know we'll be "hit" throughout the year when the police presence is not so prevalent...

JANUARY 25, 2015 – PHILADELPHIA, PENNSYLVANIA:

(about twelve different men selling bootleg at this event)



(front)



(back)

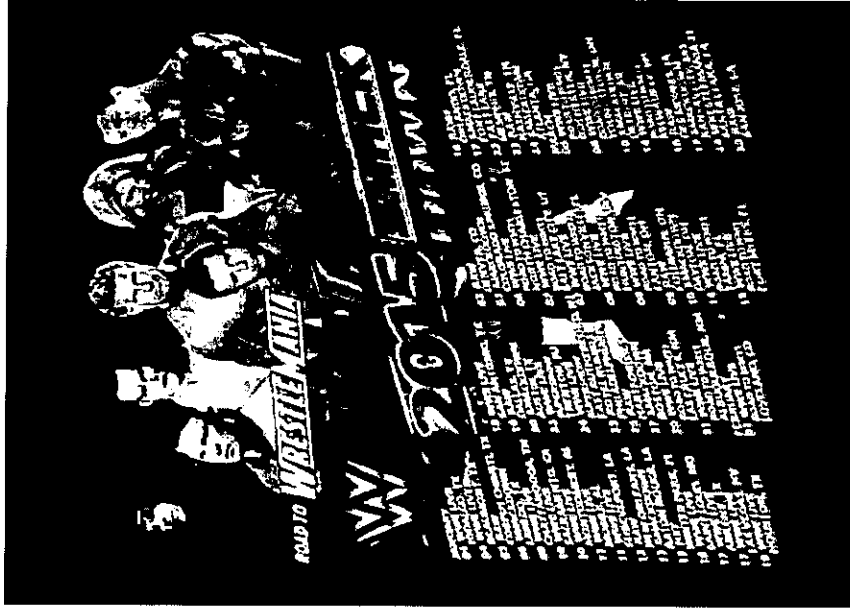
*** This is the same "Live Raw/SmackDown 2015 Design" that is sold repeatedly in different cities.

FEBRUARY 3, 2015 – COLORADO SPRINGS, COLORADO:

Our venue merchandise coordinator reported to WWE Legal: “Bootlegged heavy tonight in Co Springs. I chased them off of the front steps as there were 8 guys lined up right in front of the main entrance. They just went down to the street and parking lot and continued to sell. I didn't confiscate any shirts but it was the same weak tour shirt that we have seen the last couple of weeks. Each guy had a bag full of shirts instead of the normal act of just keeping a couple on them at a time.”



MARCH 7, 2015: - NEWARK, NEW JERSEY:



***** This is the same "Live Raw/SmackDown 2015 Design" that is sold repeatedly in different cities.**

MARCH 10, 2015 – DETROIT, MICHIGAN:
(local police sent these photos to WWE)

- Two different men were selling the identical shirt on this night.
- This is the same “Live Raw/SmackDown 2015 Design” that is sold repeatedly in different cities.

Earnest Riley bm 41954.2238
crane Detroit mi



Counterfeit Product Sold at WWE Live Events:

- Traditionally sized for children to wear
- Inferior shirt quality – could be flammable
- Inferior ink quality – could be flammable, cause allergic reactions
- Counterfeiters keep them “stored” in their pants until sale is made
- Often have strong, adverse odors not noticed until indoors

POSE A SIGNIFICANT PUBLIC SAFETY RISK!