

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA
GENERAL JURISDICTION DIVISION

CASE NO. _____

Florida Bar No. 910333

TIMOTHY SYKES

Plaintiff,

vs.

MONIKER ONLINE SERVICES, LLC

Defendant.

_____ /

COMPLAINT

COMES NOW, the Plaintiff, TIMOTHY SYKES, by and through his undersigned counsel, in the above-styled cause and sues the defendant, MONIKER ONLINE SERVICES, LLC, and states as follows

1. Plaintiff TIMOTHY SYKES is a resident of the State of Connecticut.
2. Upon information and belief, Defendant MONIKER ONLINE SERVICES, LLC is a limited liability company duly organized under the laws of the State of Florida, with its principal place of business in Pompano Beach, Florida.
3. Jurisdiction is proper pursuant to 28 USC § 1332(a).
4. Venue is proper pursuant to 28 USC § 1391(a)(1).
5. Defendant is in the business of, among other things, providing privacy services for Internet domain-name registrants.

6. Defendant provides such services for, among others, the Internet domain-name pennystockalerts.com, and its registrant.

7. Upon information and belief, the registrant for pennystockalerts.com uses the alias "Stock Psycho" ("Stock Psycho").

8. Stock Psycho has engaged in unlawful activities, including without limitation defamation, trade libel and other related torts, and has caused Plaintiff damage by reason thereof.


9. After exhaustive investigation, Stock Psycho's true identity is unknown to Plaintiff.

10. Upon information and belief, Stock Psycho's true identity is known to Defendant.

WHEREFORE, Plaintiff brings this action for the purposes of obtaining the identity of Stock Psycho and the registrant(s) of the Internet domain-name pennystockalerts.com.

Dated: March 15, 2012

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