

**WORLD INTELLECTUAL PROPERTY ORGANIZATION  
ARBITRATION AND MEDIATION CENTER**

DHL Operations, B.V.  
DHL International, GmbH  
**Complainants**

v.

Eric J. White  
**Respondent**

**Disputed Domain Name:**  
mydhl.com

**DECLARATION OF RESPONDENT**

1. The undersigned, being warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, declares that he is qualified to make all statements herein from his own personal knowledge.
2. My legal name is Eric J. White. I am an adult over the age of 18 years, and I am otherwise competent to make all of the statements in this Declaration.
3. I registered the domain name mydhl.com as an acronym for "My Democracy Has Losers."
4. I had hoped to piggyback "My Democracy Has Losers" (The democratic party being referred to in that manner by much of the Republican Talk radio media), to a successful political satire website. As a past political candidate myself, and a future successfully elected candidate, I hoped to use this as a tool to promote the party line. Unfortunately, the domain "MyDemocracyHasLosers.com is a bit long, so I shortened it to a much shorter acronym, "MyDHL.com"
5. I did not have the shipping company DHL in mind when I registered this domain name.

6. I have had plans to launch a larger website where political commentary would be found. I had also intended to produce a political chat board on the website by using vBulletin.com, but the programming for this software has been, unfortunately, daunting for me.

7. Unfortunately, I have not had time to bring my political statement website to its full fruition.

8. Nevertheless, every so often, I have updated the website with more images of American politicians with whom I disagree, along with captions mocking them.

9. I have never placed an advertisement on the website at mydhl.com, nor have I ever offered to sell the domain to anyone.

10. I have never been a Respondent in a UDRP action before.

11. I still would like to expand the website, but it does get my message across. I believe that the American politicians depicted on this website are “losers,” and that they cause our democracy to malfunction. I have placed regular captions under the photos, and I feel that these captions make a poignant political statement.

12. I have attached historical screen shots of my website found at mydhl.com to the Response in this case. These historical screen shots are true and correct representations of what the website has looked like since its inception. However, some of the photos are missing, as the internet archive does not preserve images. That said, none of the images were ever of shipping companies or anything of the like – they were all, at all times, pictures of political figures.

13. As the Panel can see, the way the site is used today is the same way that the website has been used since its inception.

14. The only interruptions in this use have been brief outages when my web hosting provider was down, or in the process of being changed.

15. I recently changed office locations, and thus my fax machine has not been operational. I never received the demand from the Complainant until it was provided to me (half of it anyway) as an exhibit to the Complaint.

16. Signed this 19<sup>th</sup> Day of January, 2010

A handwritten signature in black ink, consisting of several overlapping, slanted lines that form a stylized, abstract shape.

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Eric J. White