

BEFORE THE
FEDERAL ELECTION COMMISSION

In the Matter of:

Donald J. Trump For President 2024, Inc.
725 Fifth Ave.
New York, NY 10022

MUR 8289

&

John Doe, one or more unknown respondents

Complainant:

Cornel West For President
8253A Backlick Rd.
PO Box #1577
Newington, VA 22122

2024 JUL 16 AM 9:32
OFFICE OF
GENERAL COUNSEL

COMPLAINT

1. Cornel West for President, FEC ID No. Coo843508 ("the West-Abdullah Campaign") brings this Complaint pursuant to 52 USC §30109, upon the belief that a violation of the Federal Election Campaign Act has occurred and is continuing to occur, for which the West-Abdullah Campaign requests an immediate investigation and such enforcement action as the Commission may deem warranted by its findings.
2. Specifically, the West-Abdullah Campaign has evidence indicating that one or more persons have violated and are continuing to violate 52 USC §30124 ("Fraudulent misrepresentation of campaign authority") by making unauthorized use of the names of the federal candidates Dr. Cornel West, a candidate for President of the United States, and Dr. Melina Abdullah, a candidate for Vice President of the United States, without authorization, to divert and misdirect internet users to the website of Donald J. Trump For President 2024, Inc., FEC ID No. Coo828541 ("the Trump Campaign"), thereby fraudulently misrepresenting themselves as speaking, writing, or otherwise acting on behalf of the West-Abdullah Campaign, and/or willfully and knowingly participating in or conspiring to participate in a plan, scheme, or design for purposes of making such fraudulent misrepresentations.
3. The West-Abdullah Campaign cannot determine, and so does not allege, that the misconduct described herein has been or is being committed by the Trump Campaign itself, or even with its knowledge. Indeed, it would be speculative even to presume that the misconduct described herein is necessarily imputable to any supporter of the Trump Campaign, as it is also possible that the misconduct may be intended to falsely implicate the Trump Campaign in a Complaint just like this. The

owners and operators of the deceptive websites at issue cannot be determined by the West-Abdullah Campaign but might be discovered by the Commission. At present, we identify such as-yet-unknown respondents as “John Doe” for purposes of this Complaint. Because it is possible that not just one but two federal campaigns may be the victims of fraudulent misrepresentation in this case so near to Election Day, it is imperative that the Commission expeditiously investigate and determine the true culpable parties, whoever they may be.

RECITATION OF FACTS

4. Based upon information and belief, on or about April 10, 2024, one or more unidentified individuals, acting without authorization from the West-Abdullah Campaign, registered the domain names “westabdullah.com”, “westabdullah.org”, and “westabdullah2024.com” (referred to collectively herein as “the False Domains”). (The West-Abdullah Campaign owns the domain name “westabdullah2024.org”.) See Exhibits 1, 2, and 3. This John Doe registrant is not publicly identifiable, as they have opted for an additional privacy service to conceal their identities from public view.
5. Each of the unauthorized domain names is set to instantly redirect visitors to the website “www.donaldjtrump.com”, the official website of the Trump Campaign, where viewers are immediately presented with a solicitation for contributions. See Exhibit 4. When the solicitation pop-up is cleared, viewers find themselves on the main page of the Trump Campaign’s official website. See Exhibit 5.
6. Many of the policy positions advocated for by the West-Abdullah Campaign differ substantially from the policy positions advocated for by the Trump Campaign, so the false association of the campaigns is damaging to the West-Abdullah Campaign, causing reputational harm, potential confusion of the electorate, misdirection of would-be donors or volunteers, and the like.

RESPONDENTS

7. The Trump Campaign is plainly at least involved in this case, because the unauthorized domain names that falsely misrepresent themselves as associated with and referring to the West-Abdullah Campaign are redirecting traffic from the domain names containing the names of the West-Abdullah Campaign’s candidates to the Trump Campaign’s official website and a solicitation for contributions to the Trump Campaign.
8. However, as noted above, the West-Abdullah Campaign does not allege that the Trump Campaign is responsible, directly or indirectly, for the misconduct described herein. The Trump Campaign may not even be aware of the misconduct, and it is possible that the misconduct is intended to inaccurately suggest the Trump Campaign’s involvement.
9. Because 52 USC §30124 also prohibits participating or conspiring to participate in a fraudulent misrepresentation scheme like this, we believe it would be prudent for

- the Commission to investigate what knowledge of or involvement with this misconduct the Trump Campaign may have, if any.
10. If the Trump Campaign has fraudulently misrepresented itself as speaking, writing, or otherwise acting for or on behalf of the West-Abdullah Campaign by employing the candidates' names without the West-Abdullah Campaign's authorization, thereby damaging the West-Abdullah Campaign by causing reputational harm, confusion of the public, misdirection of donors and volunteers, etc., or if the Trump Campaign has willingly and knowingly participated in or conspired to participate in the plan, scheme, or design to make such a fraudulent misrepresentation, then that conduct is in violation of 52 USC §30124(a) and must be brought to an immediate end, along with such other enforcement measures as the Commission may deem warranted in the circumstances.
 11. The John Doe unidentified respondents are the individual or individuals who registered the False Domains without authorization from the West-Abdullah Campaign, thereby fraudulently misrepresenting themselves as speaking, writing, or otherwise acting on behalf of the West-Abdullah Campaign, and who, for the apparent purpose of soliciting contributions or donations to the Trump Campaign, caused viewers to the False Domains to be instantly misdirected to a solicitation for contributions to the Trump Campaign.
 12. The John Doe unidentified respondents also include any individual or individuals who willfully and knowingly participated in or conspired to participate in the plan, scheme, or design to make such fraudulent misrepresentations. The conduct of all such John Doe respondents described in this and the preceding paragraph is in violation of 52 USC §30124(b) and must be brought to an immediate end, along with such other enforcement measures as the Commission may deem warranted in the circumstances.
 13. GoDaddy.com, LLC is the registrar for the False Domains and is likely to be able to identify the John Doe unidentified respondents to the Commission. See Exhibits 1, 2, and 3.

ACTIONS SOUGHT

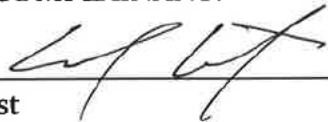
14. The West-Abdullah Campaign respectfully requests that the Commission immediately investigate the identities of the John Doe respondents, who may be identified by GoDaddy.com, LLC, with whom the False Domains are registered, and that the Commission take such enforcement action against such respondents as may be deemed warranted under the circumstances.
15. The West-Abdullah Campaign respectfully requests that the John Doe respondents, once identified, should be immediately enjoined from continuing to engage in the fraudulent misrepresentations described herein, either being ordered to convey the False Domains to the West-Abdullah Campaign, or to cause the domains to redirect viewers to the actual official website of the West-Abdullah Campaign, or to disable the False Domains entirely.

16. The West-Abdullah Campaign respectfully requests that the Commission investigate what connection, if any, the Trump Campaign may have to the fraudulent misrepresentations described herein and, if warranted, to immediately enjoin the Trump Campaign from continuing to engage in the fraudulent misrepresentations described herein, either being ordered to convey the False Domains to the West-Abdullah Campaign, or to cause the domains to redirect viewers to the actual official website of the West-Abdullah Campaign, or to disable the False Domains entirely, and to take such additional enforcement action against the Trump Campaign as may be deemed warranted under the circumstances.

VERIFICATION

Complainant Cornel West For President, upon information and belief, swears under penalty of perjury that the statements and facts set forth in this Complaint are true and correct, to the best of Complainant's knowledge and belief.

FOR THE COMPLAINANT:




 Cornel West
 Candidate
 Cornel West For President
 (FEC ID No. C00843508)

State of California

County of Orange

Sworn to and subscribed before me this 12th day of July, 2024

by Cornel West



 (Notary's official signature)

Notary Public

 (Title of office)

Sept. 22, 2026

 (Commission Expiration)

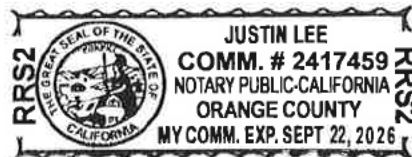


EXHIBIT 1 - p.1 of 4



westabdullah.com

Updated 7 minutes ago

Domain Information

Domain:	westabdullah.com
Registrar:	GoDaddy.com, LLC
Registered On:	2024-04-10
Expires On:	2025-04-10
Updated On:	2024-05-30
Status:	clientDeleteProhibited clientRenewProhibited clientTransferProhibited clientUpdateProhibited
Name Servers:	ns27.domaincontrol.com ns28.domaincontrol.com

Registrant Contact

Name:	Registration Private
Organization:	Domains By Proxy, LLC
Street:	DomainsByProxy.com 100 S. Mill Ave, Suite 1600
City:	Tempe
State:	Arizona
Postal Code:	85281
Country:	US
Phone:	+1.4806242599

EXHIBIT 1 - p.2 of 4

Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/results.aspx?domain=westabdullah.com>

Administrative Contact

Name: Registration Private

Organization: Domains By Proxy, LLC

Street: DomainsByProxy.com
100 S. Mill Ave, Suite 1600

City: Tempe

State: Arizona

Postal Code: 85281

Country: US

Phone: +1.4806242599

Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/results.aspx?domain=westabdullah.com>

Technical Contact

Name: Registration Private

Organization: Domains By Proxy, LLC

Street: DomainsByProxy.com
100 S. Mill Ave, Suite 1600

City: Tempe

State: Arizona

Postal Code: 85281

Country: US

Phone: +1.4806242599

EXHIBIT 1 - p.3 of 4

Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/results.aspx?domain=westabdullah.com>

Raw Whois Data

Domain Name: westabdullah.com
Registry Domain ID: 2871301071_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: <https://www.godaddy.com>
Updated Date: 2024-04-10T15:35:13Z
Creation Date: 2024-04-10T15:35:13Z
Registrar Registration Expiration Date: 2025-04-10T15:35:13Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited <https://icann.org/epp#clientTransferProhibited>
Domain Status: clientUpdateProhibited <https://icann.org/epp#clientUpdateProhibited>
Domain Status: clientRenewProhibited <https://icann.org/epp#clientRenewProhibited>
Domain Status: clientDeleteProhibited <https://icann.org/epp#clientDeleteProhibited>
Registry Registrant ID: Not Available From Registry
Registrant Name: Registration Private
Registrant Organization: Domains By Proxy, LLC
Registrant Street: DomainsByProxy.com
Registrant Street: 100 S. Mill Ave, Suite 1600
Registrant City: Tempe
Registrant State/Province: Arizona
Registrant Postal Code: 85281
Registrant Country: US
Registrant Phone: +1.4806242599
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois>.
Registry Admin ID: Not Available From Registry
Admin Name: Registration Private
Admin Organization: Domains By Proxy, LLC
Admin Street: DomainsByProxy.com
Admin Street: 100 S. Mill Ave, Suite 1600
Admin City: Tempe
Admin State/Province: Arizona
Admin Postal Code: 85281
Admin Country: US
Admin Phone: +1.4806242599

EXHIBIT 1 - p.4 of 4

Admin Phone Ext:

Admin Fax:

Admin Fax Ext:

Admin Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/resu>

Registry Tech ID: Not Available From Registry

Tech Name: Registration Private

Tech Organization: Domains By Proxy, LLC

Tech Street: DomainsByProxy.com

Tech Street: 100 S. Mill Ave, Suite 1600

Tech City: Tempe

Tech State/Province: Arizona

Tech Postal Code: 85281

Tech Country: US

Tech Phone: +1.4806242599

Tech Phone Ext:

Tech Fax:

Tech Fax Ext:

Tech Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/resul>

Name Server: NS27.DOMAINCONTROL.COM

Name Server: NS28.DOMAINCONTROL.COM

DNSSEC: unsigned

URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>

>>> Last update of WHOIS database: 2024-07-11T21:51:52Z <<<

For more information on Whois status codes, please visit <https://icann.org/epp>

TERMS OF USE: The data contained in this registrar's Whois database, while believed to be reliable, is provided "as is" with no guarantee or warranties regarding accuracy. This information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written permission of this registrar. By submitting an inquiry, you agree to these terms and limitations of warranty. In particular, you agree to use this data to allow, enable, or otherwise support the dissemination or collection of data, in part or in its entirety, for any purpose, such as transmission by e-mail, telephone, postal mail, facsimile or other means of mass unsolicited, commercial advertising or promotional purposes of any kind, including spam. You further agree not to use this data to enable high volume or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes. Failure to comply with these terms may result in termination of access to the Whois database. These terms may be subject to change at any time without notice.

Interested in similar domains?

EXHIBIT 2 - p.1 of 3



westabdullah.org

Updated 1 second ago

Domain Information

Domain:	westabdullah.org
Registrar:	GoDaddy.com, LLC
Registered On:	2024-04-10
Expires On:	2025-04-10
Updated On:	2024-04-15
Status:	clientDeleteProhibited clientRenewProhibited clientTransferProhibited clientUpdateProhibited
Name Servers:	ns09.domaincontrol.com ns10.domaincontrol.com

Registrant Contact

Organization:	Domains By Proxy, LLC
State:	Arizona
Country:	US

Raw Whois Data

Domain Name: westabdullah.org
Registry Domain ID: b136699fc7d84dde59acd0db5cc945-LROR
Registrar WHOIS Server: http://whois.godaddy.com
Registrar URL: http://www.whois.godaddy.com
Updated Date: 2024-04-15T20:36:12Z
Creation Date: 2024-04-10T20:35:15Z
Registry Expiry Date: 2025-04-10T20:35:15Z

EXHIBIT 2 - p.2 of 3

Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientDeleteProhibited <https://icann.org/epp#clientDeleteProhibited>
Domain Status: clientRenewProhibited <https://icann.org/epp#clientRenewProhibited>
Domain Status: clientTransferProhibited <https://icann.org/epp#clientTransferProhibited>
Domain Status: clientUpdateProhibited <https://icann.org/epp#clientUpdateProhibited>
Registry Registrant ID: REDACTED FOR PRIVACY
Registrant Name: REDACTED FOR PRIVACY
Registrant Organization: Domains By Proxy, LLC
Registrant Street: REDACTED FOR PRIVACY
Registrant City: REDACTED FOR PRIVACY
Registrant State/Province: Arizona
Registrant Postal Code: REDACTED FOR PRIVACY
Registrant Country: US
Registrant Phone: REDACTED FOR PRIVACY
Registrant Phone Ext: REDACTED FOR PRIVACY
Registrant Fax: REDACTED FOR PRIVACY
Registrant Fax Ext: REDACTED FOR PRIVACY
Registrant Email: Please query the RDDS service of the Registrar of Record identified in this record for more information.
Registry Admin ID: REDACTED FOR PRIVACY
Admin Name: REDACTED FOR PRIVACY
Admin Organization: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin City: REDACTED FOR PRIVACY
Admin State/Province: REDACTED FOR PRIVACY
Admin Postal Code: REDACTED FOR PRIVACY
Admin Country: REDACTED FOR PRIVACY
Admin Phone: REDACTED FOR PRIVACY
Admin Phone Ext: REDACTED FOR PRIVACY
Admin Fax: REDACTED FOR PRIVACY
Admin Fax Ext: REDACTED FOR PRIVACY
Admin Email: Please query the RDDS service of the Registrar of Record identified in this record for more information.
Registry Tech ID: REDACTED FOR PRIVACY
Tech Name: REDACTED FOR PRIVACY
Tech Organization: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
Tech City: REDACTED FOR PRIVACY
Tech State/Province: REDACTED FOR PRIVACY
Tech Postal Code: REDACTED FOR PRIVACY
Tech Country: REDACTED FOR PRIVACY
Tech Phone: REDACTED FOR PRIVACY
Tech Phone Ext: REDACTED FOR PRIVACY
Tech Fax: REDACTED FOR PRIVACY

EXHIBIT 2 - p.3 of 3

Tech Fax Ext: REDACTED FOR PRIVACY
Tech Email: Please query the RDDS service of the Registrar of Record identified in tl
Name Server: ns09.domaincontrol.com
Name Server: ns10.domaincontrol.com
DNSSEC: unsigned
URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/
>>> Last update of WHOIS database: 2024-07-11T21:43:15Z <<<

For more information on Whois status codes, please visit https://icann.org/epp
Terms of Use: Access to Public Interest Registry WHOIS information is provided to as:

Interested in similar domains?

west-abdullah.com	Buy Now
eastabdullah.com	Buy Now
westabdullahlaw.com	Buy Now
drwestabdullah.com	Buy Now
eastabdullah.net	Buy Now
westabdullahlaw.net	Buy Now

On Sale!

.space
\$29.88 \$1.88

BUY NOW

*while stocks last

.blog

.BLOG @ \$5.28 \$31.88

EXHIBIT 3 - p.1 of 4



westabdullah2024.com

Updated 1 second ago

Domain Information

Domain:	westabdullah2024.com
Registrar:	GoDaddy.com, LLC
Registered On:	2024-04-10
Expires On:	2025-04-10
Updated On:	2024-05-30
Status:	clientDeleteProhibited clientRenewProhibited clientTransferProhibited clientUpdateProhibited
Name Servers:	ns77.domaincontrol.com ns78.domaincontrol.com

Registrant Contact

Name:	Registration Private
Organization:	Domains By Proxy, LLC
Street:	DomainsByProxy.com 100 S. Mill Ave, Suite 1600
City:	Tempe
State:	Arizona
Postal Code:	85281
Country:	US
Phone:	+1.4806242599

EXHIBIT 3 - p.2 of 4

Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/results.aspx?domain=westabdullah2024.com>

Administrative Contact

Name: Registration Private

Organization: Domains By Proxy, LLC

Street: DomainsByProxy.com
100 S. Mill Ave, Suite 1600

City: Tempe

State: Arizona

Postal Code: 85281

Country: US

Phone: +1.4806242599

Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/results.aspx?domain=westabdullah2024.com>

Technical Contact

Name: Registration Private

Organization: Domains By Proxy, LLC

Street: DomainsByProxy.com
100 S. Mill Ave, Suite 1600

City: Tempe

State: Arizona

Postal Code: 85281

Country: US

Phone: +1.4806242599

EXHIBIT 3 - p.3 of 4

Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/results.aspx?domain=westabdullah2024.com>

Raw Whois Data

Domain Name: westabdullah2024.com
Registry Domain ID: 2871301072_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: <https://www.godaddy.com>
Updated Date: 2024-04-10T15:35:13Z
Creation Date: 2024-04-10T15:35:13Z
Registrar Registration Expiration Date: 2025-04-10T15:35:13Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited <https://icann.org/epp#clientTransferProhibited>
Domain Status: clientUpdateProhibited <https://icann.org/epp#clientUpdateProhibited>
Domain Status: clientRenewProhibited <https://icann.org/epp#clientRenewProhibited>
Domain Status: clientDeleteProhibited <https://icann.org/epp#clientDeleteProhibited>
Registry Registrant ID: Not Available From Registry
Registrant Name: Registration Private
Registrant Organization: Domains By Proxy, LLC
Registrant Street: DomainsByProxy.com
Registrant Street: 100 S. Mill Ave, Suite 1600
Registrant City: Tempe
Registrant State/Province: Arizona
Registrant Postal Code: 85281
Registrant Country: US
Registrant Phone: +1.4806242599
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois>
Registry Admin ID: Not Available From Registry
Admin Name: Registration Private
Admin Organization: Domains By Proxy, LLC
Admin Street: DomainsByProxy.com
Admin Street: 100 S. Mill Ave, Suite 1600
Admin City: Tempe
Admin State/Province: Arizona
Admin Postal Code: 85281
Admin Country: US
Admin Phone: +1.4806242599

EXHIBIT 3 - p.4 of 4

Admin Phone Ext:

Admin Fax:

Admin Fax Ext:

Admin Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/resul>

Registry Tech ID: Not Available From Registry

Tech Name: Registration Private

Tech Organization: Domains By Proxy, LLC

Tech Street: DomainsByProxy.com

Tech Street: 100 S. Mill Ave, Suite 1600

Tech City: Tempe

Tech State/Province: Arizona

Tech Postal Code: 85281

Tech Country: US

Tech Phone: +1.4806242599

Tech Phone Ext:

Tech Fax:

Tech Fax Ext:

Tech Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/resul>

Name Server: NS77.DOMAINCONTROL.COM

Name Server: NS78.DOMAINCONTROL.COM

DNSSEC: unsigned

URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>

>>> Last update of WHOIS database: 2024-07-11T22:00:18Z <<<

For more information on Whois status codes, please visit <https://icann.org/epp>

TERMS OF USE: The data contained in this registrar's Whois database, while believed to be reliable, is provided "as is" with no guarantee or warranties regarding accuracy. This information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written permission of this registrar. By submitting an inquiry, you agree to these terms and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise support the dissemination or collection of any kind, including spam. You further agree not to use this data to enable high volume or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes. Failure to comply with these terms may result in termination of access to the Whois database. These terms may be subject to change at any time without notice.

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EXHIBIT 4 - p.1 of 1

