

**CEASE & DESIST LETTER RE: INFRINGING DOMAIN NAME  
(ON LETTERHEAD OF TRADEMARK OWNER OR LEGAL COUNSEL)**

June 1, 2009

**WITHOUT PREJUDICE**

[REGISTERED / CERTIFIED MAIL]  
RETURN RECEIPT REQUESTED  
AND BY REGULAR MAIL

[name of domain name registrant]  
[address]

[name of domain registrar]  
[address]

Dear Sirs:

**Re:***[insert domain name]*  
*Infringement on Registered Trademark "[insert trademark]"*

*[if being sent by legal counsel: We are lawyers for [insert name of trademark owner] ("[OWNER]"),*  
*[if being sent by trademark owner: This letter is being sent to you on behalf of [insert name of trademark owner] ("[OWNER]"),*  
which is the owner of the trademark "[insert trademark]" (the "Mark"), registered as United States Federal Trademark Registration No. \_\_\_\_\_ on \_\_\_\_\_ *[date of registration]*. A copy of the trademark registration is attached hereto.

[OWNER] has used the Mark in the United States *[if appropriate: and elsewhere throughout the world]* since \_\_\_\_\_ *[insert date or approximate date of first usage]* in conjunction with the [sale, marketing, distribution, etc – *describe as appropriate*] of various products and/or services. [OWNER] also owns the domain name " \_\_\_\_\_ ", which is an active commercial website.

It has come to our attention that [CYBERSQUATTER] *[insert name of domain registrant]* has registered and is using the domain " \_\_\_\_\_ " (the "Domain") as an active Internet domain name in violation of the Anticybersquatting Consumer Protection Act of 1999, US Code Title 15, Chapter 22, Subchapter III, §1129. Further, [CYBERSQUATTER] is intentionally trading on the goodwill of [OWNER] by using a trademark that is confusing similar to the Mark.

It is evident that [CYBERSQUATTER]'s use of the Domain is intended to confuse and misdirect [OWNER]'s customers to [CYBERSQUATTER]'s website, while ensuring that [CYBERSQUATTER]'s customers are not confused. This activity is actionable under United States law and causes [CYBERSQUATTER] to be liable to [OWNER] in every state in which [CYBERSQUATTER] has sold goods through use of the Domain. These actions are unlawful and constitute unfair competition, intentional trademark infringement, trademark dilution, false designation of origin, and cybersquatting.

The United States Trademark Act provides [OWNER] with additional remedies for trademark infringement and dilution, including but not limited to preliminary and permanent injunctive relief, monetary damages, a defendant's profits, provisions for the destruction or confiscation of infringing products and materials, and, where intentional infringement is shown as is the case here, attorneys' fees and the potential for treble money damages.

**THIS IS A 2-PAGE FORM.**