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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO**

MEJ

16 PSYCHO MONKEY, LLC,

17 Plaintiff,

18 v.

19 ZYNGA GAME NETWORK, INC., a
20 Delaware Corp. and DOES 1-10,
21 inclusive,

22 Defendants.

) CASE NO.
CV 09 0603
) COMPLAINT FOR DAMAGES
) AND INJUNCTIVE RELIEF
) BASED ON:
)
) 1. COPYRIGHT INFRINGEMENT
) [17 U.S.C. §§ 101 et. seq.]
) 2. FEDERAL UNFAIR
) COMPETITION/FALSE
) DESIGNATION OF ORIGIN [15
) U.S.C. §§ 1125(a) et. seq.]
) 3. CALIFORNIA UNFAIR
) COMPETITION [CALIFORNIA
) BUSINESS AND PROFESSIONS
) CODE §§ 17200 et. seq.]
) JURY TRIAL DEMANDED

27 **COMPLAINT FOR COPYRIGHT INFRINGEMENT, FEDERAL UNFAIR COMPETITION**
28 **AND CALIFORNIA UNFAIR COMPETITION**

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I.

NATURE OF ACTION

1. Psycho Monkey, LLC (“Psycho Monkey”) creates and manages text-based games for online, social networks. Psycho Monkey owns the intellectual rights to a unique game, “Mob Wars”, which is operated on the social network “Facebook”. After Defendants failed in its efforts to acquire “Mob Wars” and to hire Psycho Monkey’s principal for development of its own games, Defendants cloned “Mob Wars” and dubbed its game “Mafia Wars”. Defendants have illegally posted “Mafia Wars” on “Myspace”, “Facebook”, and other social networks. “Mafia Wars” is wrongfully diverting customers and revenue from Psycho Monkey.

II.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over the claims relating to the Copyright Act (17 U.S.C. §§ 101, 501) and the Lanham Act (15 U.S.C. §§ 1125 et. seq.) pursuant to 28 U.S.C. § 1331 (federal subject matter jurisdiction) and 28 U.S.C. §1338(a) (any act of Congress relating to copyrights, patents and trademarks). This Court has subject matter jurisdiction over the related state law claims under 28 U.S.C. § 1367 (action asserting a state claim of unfair competition joined with a substantial and related federal claim under the patent, copyright or trademark laws).

3. This Court has personal jurisdiction over Defendants because Defendants are doing business in California and have wrongfully diverted business from Psycho Monkey by posting “Mafia Wars” and charging fees for game usage in California.

4. Venue is proper in this judicial district under 28 U.S.C. § 1391(b) and (c) because a substantial part of the events giving rise the claim occurred in this

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COMPLAINT FOR COPYRIGHT INFRINGEMENT, FEDERAL UNFAIR COMPETITION
AND CALIFORNIA UNFAIR COMPETITION

1 District, Defendants' principal place of business is in this District, and harm to
2 Psycho Monkey has occurred in this District. This action is properly assigned to
3 the San Francisco Division of this judicial district pursuant to Local Rules 3-2 (c)
4 and (d) because this is an intellectual property action arising in San Francisco
5 County.

6 **III.**

7 **PARTIES**

8 5. Psycho Monkey is, and was at all times relevant herein, a limited
9 liability company in good standing, organized under the laws of the State of
10 California, and having its principal place of business in the State of California,
11 County of San Francisco.

12 6. Defendant Zynga Game Network, Inc. ("Zynga") is, and was at all
13 times relevant herein, a Delaware corporation, having its registered place of
14 business in Menlo Park, County of San Mateo. Zynga is a direct competitor of
15 Psycho Monkey's.

16 7. Psycho Monkey is unaware of the true names and capacities, whether
17 individual, corporate or otherwise, of Defendants Does 1 through 10, inclusive, and
18 therefore sues these Defendants by such fictitious names. Psycho Monkey will
19 seek leave to amend this complaint when the status and identity of these
20 Defendants are ascertained. The Doe Defendants include persons and entities
21 assisting or acting in concert with the other Defendants in connection with the acts
22 complained herein. All further references in this Complaint to "Defendant" or
23 "Defendants" expressly include each fictitiously named Defendant.

24 8. Psycho Monkey is informed and believes and thereon alleges that at
25 all times herein mentioned and material hereto, some or all of said Defendants
26 were the officers, directors, principals, agents, servants, employees and/or
27 authorized representatives of some or each and every other Defendant, and each of

1 them; and that, in doing the actions herein alleged or in not doing those acts herein
2 alleged not to have been performed by omission, said Defendants were acting
3 within the course and scope of such agency and/or authority.

4 **IV.**

5 **GENERAL ALLEGATIONS**

6 9. In or around December 2007, David Maestri ("Maestri") created an
7 interactive, online game, "Mob Wars". Maestri is a principal of Psycho Monkey.

8 10. Mob Wars is played on the social networking website
9 www.facebook.com ("Facebook"). Players assume the role of a mobster and
10 interact with other players on Facebook using that persona. The goal of the game
11 is to build a reputation as a mobster within the Facebook community by carrying
12 out various tasks. A player's status depends on the number of points the player has
13 accumulated.

14 11. Players are awarded points, in large part, based on the number of
15 connections each player has within the Facebook community. A player's ability to
16 carry out assigned tasks and move on to the next level in the game depends on the
17 number of connections.

18 12. Points are also awarded to players that agree to "click" on to links for
19 outside advertisers and to participate in certain activities therein. These links
20 generate revenue for Psycho Monkey.

21 13. Players may also purchase points directly from Psycho Monkey.

22 14. On July 9, 2008, Psycho Monkey registered its work, "Mob Wars",
23 with the United States Copyright Office. A true and correct copy of Certificate of
24 Registration, TX 6-851-076, is attached hereto as Exhibit "1" and is incorporated
25 by reference. The registered work includes the source code and screen shot for
26 each command term referenced in paragraph 15 below.

1 15. "Mob Wars" has eleven distinct command terms. Players must use
2 these terms in order to advance through the game. Players are ranked according to
3 four categories: (1) "bank funds", (2) "fight count", (3) "kill count", and (4) "kills
4 on the hit list". Players use the following eleven distinct command terms to
5 improve rankings:

- 6 • Job List. The job list allows players to earn money and
7 experience. This is ordinarily the first command term that players
8 engage in because they need money and experience in order to
9 progress to the next level. Within this command term, players are
10 initially asked to perform tasks such as muggings, burglaries, car
11 thefts, and liquor store robberies. As a player earns more experience,
12 they will be offered different jobs. Each job requires a minimum
13 amount of energy, weapons, or tools. Energy is consumed every time
14 a player completes a task.
- 15 • Stockpile. Players can acquire weapons, vehicles, and gadgets
16 through this command term. Players can use the money they earn
17 from the "Job List" to purchase crowbars, baseball bats, guns and
18 vehicles. Weapons, vehicles and gadgets are necessary in order to
19 complete high level tasks on the "Job List." Furthermore, weapons
20 can be used to attack other mobsters or defend attacks initiated by
21 other mobsters.
- 22 • Fight Now. Players can attack and steal from rival mobsters
23 through this command term. By clicking on this command term,
24 players are given a list of players (and the size of their mobs) that can
25 be attacked. If a player is successful in the fight, he robs that player
26 of a portion of their money. If a player is unsuccessful in the fight, he
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1 loses health and stamina points. Players are recognized in the “Made
2 Men” command term for winning the most fights.

3 • Bank Account. Players can deposit money they earn from the
4 game into a Bank Account through this command term. A player
5 must have a minimum of \$10,000 to deposit money into the Bank.
6 All money in the bank account is a safe-haven for players because a
7 player that loses a fight or gets killed will not lose any money he has
8 in the bank account.

9 • The City. Players can claim control over the city and earn
10 recurring income through this command term. Players can purchase
11 empty lots, city blocks, downtown squares, villas, restaurants, and
12 apartments. Each property costs a different amount of money based
13 on the income generated therefrom.

14 • The Hospital. Players can heal their wounds by going to the
15 hospital. As mentioned above, players will lose health and stamina
16 points if they lose a fight or get killed. Players cannot go to the
17 Hospital unless they have a Bank Account.

18 • My Mob. Players can earn money for each new player that
19 joins their mob through this command term. These players are
20 acquired by “inviting” other members of the social network to play
21 the game. If the invitation is accepted, that person becomes a mob
22 member. The size of a player’s mob directly impacts that player’s
23 ability to win fights and defend against attacks.

24 • The Hit List. Players can publicly list rival mobsters on the
25 “Hit List.” All players (even those that are not in your mob) are
26 encouraged to kill these players for two reasons. First, players are
27 praised for the total number of kills they have on the Hit List in the
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1 17. Exhibit "2" consists of true and correct copies of the following documents: (a)
2 Psycho Monkey's screen shots for "Mob Wars", as of July 2008, and (b) Defendants' infringing
3 material, as of July 2008, for "Mafia Wars", as published on "Myspace". For comparison
4 purposes, each Psycho Monkey screen shot proceeds that of the correlating, infringing material.

5 V.

6 **FIRST CAUSE OF ACTION**
7 **(COPYRIGHT INFRINGEMENT [17 U.S.C. §§ 101, et. seq.])**
8 **Against All Defendants**

9 18. Psycho Monkey refers to and incorporates paragraphs 1 to 17 above as though
10 fully set forth herein.

11 19. Defendants deliberately and intentionally copied the physical and operational
12 aspects of Mob Wars. Defendants copied Mob Wars' layout and arrangement, visual
13 presentation, sequence and flow, scoring system, and Mob Wars' overall look.

14 20. Defendants Copied the Layout and Arrangement of Main Menu. Mob Wars'
15 Main Menu is creatively structured around eleven distinct command terms – (1) "The Job List";
16 (2) "The Hit List"; (3) "The City"; (4) "The Bank"; (5) "The Godfather"; (6) "The Hospital"; (7)
17 "Fight Now"; (8) "My Stockpile"; (9) "My Mob"; (10) "My Boss"; and (11) "Made Men".

18 Defendants copied all eleven command terms and arranged the command terms, along with a
19 similar description of each command term, in a format nearly identical to that of Mob Wars.

20 21. Defendants Copied the Individual Screen Displays for Each Command Term.

21 *The Job List/Crime Jobs* – In order to gain experience in Mob Wars and Mafia Wars, a
22 player must complete jobs or missions. This command term is labeled "The Job List" in Mob
23 Wars and "Crime Jobs" in Mafia Wars. Both of these screen displays describe each task, the
24 payout for each task, the experience for each task, the energy required for each task, and the
25 weapons required for each task. The following matrix shows the substantial similarity between
26 the two screens displays.

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COMPLAINT FOR COPYRIGHT INFRINGEMENT, FEDERAL UNFAIR COMPETITION
AND CALIFORNIA UNFAIR COMPETITION

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Mob Wars	Mafia Wars
"Mugging" Payout: \$200-\$300 Experience: +1 Req'd Energy: 1 Req'd Weapons: None	"Mugging" Payout: \$200-\$300 Experience: +1 Req'd Energy: 1 Req'd Weapons: None
"House Burglary" Payout: \$800-\$1,200 Experience: +3 Req'd Energy: 3 Req'd Weapons: Crowbar	"Corner Store Hold-Up" Payout: \$800-\$1,200 Experience: +3 Req'd Energy: 3 Req'd Weapons: Crowbar
"Stoplight Car Theft" Payout: \$1,400 - \$2,500 Experience: + 5 Req'd Energy: 5 Req'd Weapons: Pistol	"Warehouse Robbery" Payout: \$1,400-\$2,500 Experience: +5 Req'd Energy: 5 Req'd Weapons: Colt Revolver
"Liquor Store Robbery" Payout: \$2,800 - \$4,600 Experience: +8 Req'd Energy: 7 Req'd Weapons: Pistol & Shotgun	"Auto Theft" Payout: \$2,800-\$4,600 Experience: +8 Req'd Energy: 7 Req'd Weapons: Colt Revolver and Sawed-Off Shotgun

- *The City/Properties.* Players can acquire rental property in to build a bank account. This command term is labeled "The City" in Mob Wars and "Properties" in Mafia Wars. Screens contain the following additional similarities:

Mob Wars	Mafia Wars
"Empty Lot" Income: \$100 Buy/Sell: \$5,000	"Abandoned Lot" Income: \$100 Buy/Sell: \$5,000
"City Block" Income: \$300 Buy/Sell: \$50,000	"Commercial Block" Income: \$300 Buy/Sell: \$50,000
"Downtown Square" Income: \$2,000 Buy/Sell: \$1,000,000	"Prime Downtown Lot" Income: \$2,000 Buy/Sell: \$1,000,000

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- *The Bank/The Bank.* The “bank” is a safe haven for players to store their money. This command term is labeled “The Bank” in Mafia Wars and Mob Wars. Although these screen displays are not identical, they convey the same expression in a similar manner. If players get killed in Mafia Wars or Mob Wars, they lose all money not otherwise held in a bank.
- *The Godfather/The Godfather.* The “Godfather” command term is the monetization process by which players can purchase, through “favor points” or “reward points,” cash, mob members, or energy. This command term is labeled “The Godfather” in Mafia Wars and Mob Wars. This command term allows players to expedite the game-play so that they can accomplish tasks faster than normal. Players can acquire “favor points” in Mob Wars or “reward points” in Mafia Wars by signing up for certain advertising links or purchasing “favor points” or “reward points” with real money from the web host (Psycho Monkey or Zynga). The following matrix shows the substantial similarity between these two screens displays.

Mob Wars	Mafia Wars
Offer: The Godfather offers you \$5,500 for 10 favor points Action: accept for 10 favor points.	Godfather’s Offer: The Godfather offers you \$10,000 for 10 reward points Action: accept for 10 points.
Offer: The Godfather offers you 1 mob member (hired gun) for 20 favor points. Action: accept for 20 favor points.	Offer: The Godfather offers you 1 extra family member for 20 reward points. Action: accept for 20 reward points.
Offer: The Godfather offers you 10 energy (refill) for 10 favor points. Action: accept for 10 favor points.	Offer: The Godfather offers you a full energy refill for 10 reward points. Action: accept for 10 points.

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COMPLAINT FOR COPYRIGHT INFRINGEMENT, FEDERAL UNFAIR COMPETITION AND CALIFORNIA UNFAIR COMPETITION

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- *The Hospital/The Hospital.* Players go to the Hospital to increase their health. This heals wounds incurred during fights/battles. This command term is labeled "The Hospital" in both Mob Wars and Mafia Wars. In both games, a player must use "clean" money in order to go to the Hospital. In order to have clean money, a player must have sufficient funds to open a Bank Account (\$10,000.00).
- *My Stockpile/Inventory.* Players must have weapons in order to complete jobs or missions. Weapons can be obtained through the "My Stockpile" command term in Mob Wars and the "Inventory" command term in Mafia Wars. The screen displays for these command terms are nearly identical, as they both provide users with the selection of weapons, the cost of weapons, and the attack/defense value for the weapons. The following matrix shows that the weapons cost the same and retain the same attack and defense values.

Mob Wars	Mafia Wars
Details: Crowbar/Attack 1 Buy/Sell: \$300	Details: Crowbar/Attack 1/Defense 1 Buy/Sell: \$300
Details: Baseball Bat/Attack 1/Defense 1 Buy/Sell: \$700	Details: Baseball Bat/Attack 1/Defense 0 Buy/Sell: \$700
Details: Colt 1911/Attack 2/Defense 2 Buy/Sell: \$1000	Details: Colt Pistol/Attack 2/Defense 2 Buy/Sell: \$1000
Details: 44 Magnum/Attack 3/Defense 1 Buy/Sell: \$2000	Details: Sawed Off Shotgun/Attack 3/Defense 1 Buy/Sell: \$2000
Details: Pump-Action Shotgun/Attack 2/Defense 4 Buy/Sell: \$3000	Details: Grenades/Attack 2/Defense 4 Buy/Sell: \$3000

- *Fight Now/FIGHT!* Players can engage in a fight with another player using various different weapons. This command term is labeled "Fight Now" in

1 Mob Wars and "FIGHT!" in Mafia Wars. Both of these screen displays are in
2 blue type-font and list other players (and their mob size) that are online and
3 can be attacked. Fighting allows users to gain experience points to move to
4 towards the next level. If a player wins the fight, they also steal a portion of
5 the other player's money.

- 6 • *My Mob/My Mafia.* Players can form strategic alliances with other users in
7 the platform host website (Facebook) by creating their own mob. This
8 command term is labeled "Your Mob" in Mob Wars and "My Mafia" in Mafia
9 Wars. The screen displays for both games allow players to band together and
10 attack other mobs, defend attacks initiated by other mobs, gain money, and
11 acquire experience points. Although the screen display in Mafia Wars is
12 slightly different from Mob Wars, the underlying expression behind these
13 command terms and the accompanying screen displays have been copied by
14 Mafia Wars.
- 15 • *The Hit List/The Hit List.* Players can list other players on the Hit List as a
16 retaliatory move. This command term is labeled "The Hit List" in Mob Wars
17 and Mafia Wars. The Hit List is publicly announced to all players and
18 encourages all players of the game to attack players that are listed on the Hit
19 List. Players that have killed the largest number of people on the Hit List are
20 praised in the "Top Mobsters" command term in Mob Wars and the "Top
21 Families" command term in Mafia Wars. Furthermore, players can steal the
22 money from any player they kill on the Hit List.
- 23 • *My Boss/Upgrades.* Players can view their own statistics by virtue of this
24 command term. This command term is labeled "My Boss" in Mob Wars and
25 "Upgrades" in Mafia Wars. By clicking on this command term, players are
26 directed to a screen display that contains a player's attack strength, defenses
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strength, max energy, max health, and stamina. The following matrix shows the substantial similarity between these two screens displays.

Mob Wars	Mafia Wars
Attack Strength: Attack points make your mob more effective when attacking other mobs.	Attack Strength: Attack points make your mob more effective when attacking other mobs.
Defense Strength: Defense points make your mob more effective at defending from hostile mob attacks.	Defense Power: Defense points make your mob more effective at defending from hostile mob attacks.
Max Energy: Increase your energy capacity to complete more jobs and other actions.	Maximum Energy: Increase your energy capacity to complete more jobs and other actions.
Max Health: Increase your max health to better survive intense fights.	Max Health: Increase your max health to better survive intense fights.
Stamina: Increase your stamina to fight more often.	Maximum Stamina: Increase your stamina to fight more often. 2 skill points needed for increase!

- *Made Men/Top Families.* Both Mob Wars and Mafia Wars rank players according to the same four categories: “Kill Count” (most kills); “Top Fighters” (most fights won); “Top Bounty Hunters” (most kills for people on the Hit List); and “Top Tycoons” (most money in the bank). The following shows the screen display for this command term:

Mob Wars	Mafia Wars
Most Deadly – Knock-out Count	Most Deadly – KO Count
Top Fighters – Win Count	Top Fighters – Win Count
Top Bounty Hunters – Head Count	Top Bounty Hunters – Head Count
Top Tycoons – Bank Funds	Top Tycoons – Bank Funds

1 Mob Wars and "My Mafia" in Mafia Wars. The screen displays
 2 for both games allow players to band together and attack other
 3 mobs, defend attacks initiated by other mobs, gain money, and
 4 acquire experience points. Although the screen display in Mafia
 5 Wars is slightly different from Mob Wars, the underlying
 6 expression behind these command terms and the accompanying
 7 screen displays have been copied by Mafia Wars.

- 8 • *The Hit List/The Hit List.* Players can list other players on the Hit
 9 List as a retaliatory move. This command term is labeled "The Hit
 10 List" in Mob Wars and Mafia Wars. The Hit List is publicly
 11 announced to all players and encourages all players of the game to
 12 attack players that are listed on the Hit List. Players that have
 13 killed the largest number of people on the Hit List are praised in
 14 the "Top Mobsters" command term in Mob Wars and the "Top
 15 Families" command term in Mafia Wars. Furthermore, players can
 16 steal the money from any player they kill on the Hit List.
- 17 • *Your Mob Boss/Profile.* Players can view their own statistics by
 18 virtue of this command term. This command term is labeled "Your
 19 Mob Boss" in Mob Wars and "Upgrades" in Mafia Wars. By
 20 clicking on this command term, players are directed to a screen
 21 display that contains a player's attack strength, defenses strength,
 22 max energy, max health, and stamina. The following matrix shows
 23 the substantial similarity between these two screens displays:

Mob Wars	Mafia Wars
Attack Strength: Attack points make your mob more effective when attacking other mobs.	Attack Strength: Attack points make your mob more effective when attacking other mobs.

1 2 3	Defense Strength: Defense points make your mob more effective at defending from hostile mob attacks.	Defense Power: Defense points make your mob more effective at defending from hostile mob attacks.
4 5 6	Max Energy: Increase your energy capacity to complete more jobs and other actions.	Maximum Energy: Increase your energy capacity to complete more jobs and other actions.
7 8	Max Health: Increase your max health to better survive intense fights.	Max Health: Increase your max health to better survive intense fights.
9 10 11	Stamina: Increase your stamina to fight more often.	Maximum Stamina: Increase your stamina to fight more often. 2 skill points needed for increase!

- *Made Men/Top Families.* Both Mob Wars and Mafia Wars rank players according to the same four categories: "Kill Count" (most kills); "Top Fighters" (most fights won); "Top Bounty Hunters" (most kills for people on the Hit List); and "Top Tycoons" (most money in the bank). The following shows the screen display for this command term:

Mob Wars	Mafia Wars
Most Deadly – Knock-out Count	Most Deadly – KO Count
Top Fighters – Win Count	Top Fighters – Win Count
Top Bounty Hunters – Head Count	Top Bounty Hunters – Head Count
Top Tycoons – Bank Funds	Top Tycoons – Bank Funds

22. Defendants Copied the Sequence and Flow of Mob Wars. Players in both games are confined to the same parameters based on time, energy, health,

1 stamina, weapons, experience, and size of players' mob. Players must efficiently
2 use their skill and calculation to complete missions, purchase weapons, acquire
3 property, fight other players, kill other players, and build their own mob. Mob
4 Wars' sequence and flow is copied because players are required to strategically
5 balance the following two criteria: (1) the ability to complete tasks by gaining
6 experience, money, weapons, and mob members, and (2) the ability to complete
7 these tasks by efficiently managing a player's time, which can only be
8 accomplished by economically regenerating energy, health, and stamina.

9 23. Defendants Copied The Scoring System in Mob Wars. The scoring
10 system in Mafia Wars is substantially similar to the scoring system in Mob Wars:
11 (i) the choice of weapons, their functions and their prices are virtually identical; (ii)
12 the choice of jobs, the weapons and energy needed to complete the jobs, and the
13 experience points received for completing jobs are virtually identical; (iii) the price
14 of properties, the choice of properties, and the income from owning properties are
15 virtually identical; (iv) the costs to purchase godfather reward points ("favor
16 points" or "reward points") are virtually identical; (v) the requirements for the
17 "hitlist" are identical; and (vi) the "upgrade" feature is virtually identical because
18 the values for increase strength, energy, health, and stamina are substantially
19 similar.

20 24. Defendants Copied The Overall Plot, Theme, Mood, Setting, Pace,
21 Characters, and Sequence of Mob Wars. As demonstrated in more detail above,
22 Mafia Wars copied the physical and operational aspects of Mob Wars by copying
23 the layout and arrangement of Mob Wars, the visual presentation of each screen
24 display within the game, the sequence and flow of the game, the scoring system
25 used by the game, and the overall look and feel of the game. Furthermore, Mafia
26 Wars copied the underlying premise behind the game, which is to build your bank
27 account, form your own mob (by making alliances with other users on the social
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1 networking website or by purchasing mob members from Psycho Monkey),
2 fighting and killing rival mob members, and killing people on the "hit list."
3 Therefore, Defendants copied the same plot, theme, mood, setting, pace,
4 characters, and sequence of events from Mob Wars.

5 25. Defendants copied Mob Wars in a manner that clearly infringes on
6 Psycho Monkey's copyright and unless Defendants are enjoined, they will continue
7 do so. At no time did Psycho Monkey authorize Defendants to reproduce, adapt,
8 or distribute Mob Wars.

9 26. Each player that is wrongfully diverted to Mafia Wars constitutes an
10 entire network of social connections and related revenues (each player's social
11 network on Facebook is part of the player's value as a customer to Psycho
12 Monkey).

13 27. As a direct result of Defendants' infringement of Psycho Monkey's
14 rights, Psycho Monkey has sustained, and will continue to sustain, substantial
15 injury, loss, and damages in an amount exceeding \$100,000.00 and as proven at
16 trial.

17 28. Psycho Monkey is entitled to a permanent injunction restraining
18 Defendants, their officers, directors, agents, employees, representatives and all
19 persons acting in concert with them from engaging in further acts of copyright
20 infringement.

21 29. Psycho Monkey is further entitled to recover from Defendants the
22 gains, profits and advantages Defendants have obtained as a result of their acts of
23 copyright infringement. Psycho Monkey is at present unable to ascertain the full
24 extent of the gains, profits and advantages Defendants have obtained by reason of
25 their acts of copyright infringement, but Psycho Monkey is informed and believes,
26 and on that basis alleges, that Defendants obtained such gains, profits and
27 advantages in an amount exceeding \$500,000.00.

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VI.

SECOND CAUSE OF ACTION
(UNFAIR COMPETITION/FALSE DESIGNATION OF ORIGIN [15 U.S.C. 1125(a)])
Against All Defendants

30. Psycho Monkey refers to and incorporates paragraphs 1 to 29 above as though fully set forth herein.

31. Psycho Monkey operates Mob Wars, its flagship game, under the mark "Mob Wars". The mark consists of the words in a stylized format.

32. Psycho Monkey first adopted and began using this mark in or around February of 2008 when it launched Mob Wars on Facebook and the mark is protected under common law. Psycho Monkey is in the process of obtaining formal trademark registration.

33. Psycho Monkey has continuously used this mark since that date to identify its Mob Wars game and the mark is intended to identify the game across different social networking platforms.

34. Mob Wars has over 3 million subscribers. The internet, however, constitutes a virtual market that spans the globe. Psycho Monkey has worked to promote this mark as part of its distinctive game site within the social networking community.

35. The font type/graphic style for "Mafia Wars" is markedly similar to "Mob Wars". Defendants have placed the name "Mafia Wars" in or around the same locations throughout the game as in Mob Wars.

36. Defendants' violation of Psycho Monkey's common law trademark rights is likely to cause confusion, mistake, or deception among customers in violation of the Lanham Act.

37. Each player that is wrongfully diverted to Mafia Wars constitutes an entire network of social connections and related revenues (each player's social

1 network on Facebook is part of the player's value as a customer to Psycho
2 Monkey).

3 38. As a direct result of Defendants' violation of 15 U.S.C. §§ 1125(a) et.
4 seq., ("Lanham Act"), Psycho Monkey has sustained, and will continue to sustain,
5 substantial injury, loss and damages in an amount exceeding \$100,000.00 and as
6 proven at trial.

7 39. Psycho Monkey is entitled to a permanent injunction restraining
8 Defendants, their officers, directors, agents, employees, representatives and all
9 persons acting in concert with them from engaging in the conduct described herein
10 that violates the Lanham Act.

11 40. Psycho Monkey is further entitled to recover from Defendants the
12 gains, profits, and advantages Defendants have obtained as a result of their
13 violation of the Lanham Act. Psycho Monkey is at present unable to ascertain the
14 full extent of the gains, profits, and advantages Defendants have obtained by
15 reason of their acts of copyright infringement, but Psycho Monkey is informed and
16 believes, and on that basis alleges, that Defendants obtained such gains, profits,
17 and advantages in an amount exceeding \$500,000.00.

18 **VII.**

19 **THIRD CAUSE OF ACTION**
20 **(UNFAIR COMPETITION UNDER CALIFORNIA BUSINESS AND**
21 **PROFESSIONS CODE § 17200)**
22 **Against All Defendants**

23 41. Psycho Monkey refers to and incorporates paragraphs 1 to 40 above
24 as though fully set forth herein.

25 42. The aforesaid acts by Defendants illegally infringe upon Psycho
26 Monkey's intellectual property rights and have wrongfully diverted business away
27 from Psycho Monkey. Defendants have, and continue to, unfairly compete with
28

1 Psycho Monkey in violation of California Business and Professions Code §§ 17200
2 et. seq. (California Unfair Competition Law, the "UCL").

3 43. Defendants' actions as alleged above violate the "unfair" prong of the
4 UCL because (a) the utility of such actions is outweighed by the gravity of the
5 harm they cause to Psycho Monkey, (b) such actions are immoral, unethical,
6 oppressive, unscrupulous, and substantially injurious to consumers, and (c) such
7 actions constitute incipient violations of state and federal copyright laws.

8 44. Defendants' actions as alleged above violate the "fraudulent" prong of
9 the UCL because they are likely to mislead and confuse a statistically significant
10 percentage of reasonable consumers.

11 45. Defendants' actions as alleged above violate the "unlawful" prong of
12 the UCL because those same actions also constitute violations of the state and
13 federal statutes set forth above.

14 46. Defendants' conduct has injured Psycho Monkey and, unless
15 enjoined, will continue to cause great, immediate, and irreparable injury to Psycho
16 Monkey.

17 47. Psycho Monkey is without an adequate remedy at law.

18 48. Psycho Monkey is therefore entitled to injunctive relief and an order
19 for disgorgement of all of Defendants' ill-gotten gains pursuant to California
20 Business and Professions Code § 17203.

21 **PRAYER**

22 **WHEREFORE**, Psycho Monkey prays for judgment against Defendants as
23 follows:

24 1. For a permanent injunction enjoining Defendants and all persons
25 acting in concert with them from manufacturing, producing, distributing, adapting,
26 displaying, advertising, promoting, offering for sale and/or selling, or performing
27 any materials that are substantially similar to Mob Wars, and to deliver to the

1 Court for destruction or other reasonable disposition all materials and means for
2 producing the same in Defendants' possession or control;

3 2. For a permanent injunction, enjoining Defendants and all persons
4 acting in concert with them from using the name "Mafia Wars" in connection with
5 any web-based mafia-style video game on any social networking website or from
6 otherwise using Psycho Monkey's mark, "Mob Wars", or in any way causing the
7 likelihood of confusion, deception, or mistake as to the source, nature, or quality of
8 Defendants' games and to deliver to the Court for destruction or other reasonable
9 disposition all materials bearing the infringing mark in Defendants possession or
10 control;

11 3. For any and all damages sustained by Psycho Monkey in a sum no
12 less than \$100,000.00;

13 4. For all of Defendants' profits wrongfully derived from the
14 infringement of Psycho Monkey's intellectual property rights in an amount no less
15 than \$500,000.00;

16 5. For reasonable attorney's fees;

17 6. For costs of suit herein; and

18 7. For other such relief as the Court deems proper.

19 Dated: February 10, 2009

GRESHAM SAVAGE NOLAN & TILDEN,
A Professional Corporation

20
21
22 By: 

Theodore K. Stream

Jamie Wrage

Emma D. Enriquez

Attorneys for Plaintiff, Psycho Monkey, LLC

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DEMAND FOR JURY TRIAL

Plaintiff Psycho Monkey hereby demands a jury trial as provided by Rule 38(a) of the Federal Rules of Civil Procedure.

Dated: February 10, 2009

GRESHAM SAVAGE NOLAN & TILDEN,
A Professional Corporation

By: 

Theodore K. Stream
Jamie Wrage
Emma D. Enriquez
Attorneys for Plaintiff, Psycho Monkey, LLC

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Registration Number:

TX 6-851-076

Effective date of registration:

July 9, 2008

Title

Title of Work: "Mob Wars"

Completion/Publication

Year of Completion: 2008

Date of 1st Publication: February 1, 2008

Nation of 1st Publication: United States

Author

Author: David Thomas Maestri

Author Created: computer program

Work made for hire: No

Citizen of: United States

Domiciled in: United States

Year Born: 1983

Copyright claimant

Copyright Claimant: Psycho Monkey, LLC

1758 Larkin Street, San Francisco, CA, 94109, United States

Transfer Statement: By written agreement

Certification

Name: Adam A. Burton

Date: July 9, 2008

Correspondence: Yes

IPN#:



* *

Registration #: TX0006851076

Service Request #: 1-75599331

Gresham Savage Nolan & Tilden, APC
Adam A. Burton
3750 University Avenue
Suite 250
Riverside, CA 92501 United States

MAIN INTERFACE

Home | Edit | Friends | Inbox | Home | Account | Privacy | Logout

NEW: Download a Facebook Toolbar For IE Now! [Download](#)

Mob Wars

Cash: \$3000 Health: 55/100 Energy: 10/10 Stamina: 0/3 Exp: 0 Level: 1

Main Menu

- (Make some fast money and gain experience.)
- (Get the kill and take home the cash.)
- (Claim control of the city to earn recurring income.)
- (Safehouse your earnings here, but for a fee.)
- (Help The Godfather, earn big rewards in return.)
- (Pay a doctor to stitch up those bullet wounds.)
- (Attack and rob rival mobsters.)
- (Equip your mob with weapons, vehicles, and gadgets.)
- (Gain \$1000 for each friend who joins your mob.)
- (View and level-up your character.)
- (Pay your respects to the top mobsters on Mob Wars.)

Status: More health in 155 seconds. More stamina in 99 seconds.

Above is facebook.com mobwars



Gladiators!

Play Hit & Run, the Pyramid, or the Wall to Win Free Prizes!

12:15 PM

Mafia Wars

Home | My Mafia | My Stats | My Friends

Cash: \$3,791

Health: 37/100

Energy: 0/10

Stamina: 3/3

Experience: 10

Level: 1

Main Menu

- ≡ Crime Jobs (Do crime jobs to gain experience and earn money.)
- ≡ Marked Men (50) (Get the hit and earn the cash.)
- ≡ Properties (Buy properties to earn recurring income.)
- ≡ The Bank (Keep your earnings safe here.)
- ≡ The Godfather (Earn big rewards for helping the Godfather.)
- ≡ The Hospital (Pay a doctor to heal your wounds.)
- ≡ FIGHT! (Attack rival families and take their cash.)
- ≡ Inventory (Equip your family with weapons and vehicles.)
- ≡ My Mafia (Grow your mafia family to become more powerful.)
- ≡ Upgrades (View and upgrade and your family's skills.)
- ≡ Top Families (Pay respects to the best families on Mafia Wars.)

Status: More Health in 120 seconds. More Energy in 300 seconds.

Above Mafia Wars from Myspace.com is almost identical interface and menu system as mob wars. Wording is practically the same a few words have been changed.

JOB INTERFACE

Collect Famous NBA Stars! Kobe, KG, CP3, Shaq & More!

Mob Wars

Cash: \$3000 Health: 100/100 Energy: 10/10 Stamina: 3/3 Exp: 0 Level: 1

[]

The Job List

Description / Payout	Job Requirements	Action
Mugging Payout: Experience: +1	Energy: 1	<input type="button" value="Do Job"/>
House Burglary Payout: Experience: +3	Energy: 3	<input type="button" value="Do Job"/>
Stoplight Car Theft Payout: Experience: +5	Energy: 5	<input type="button" value="Do Job"/>
Liquor Store Robbery Payout: Experience: +8	Energy: 7 Mobsters: 1	<input type="button" value="Do Job"/>

Above is Mob Wars from facebook.com

Be the King
 of Your Castle
 BUILT YOUR OWN CASTLE
 DRAG HERE

LendingTree
 Refinance Loan:
 \$400,000 for \$2,240/Month*
 \$300,000 for \$1,680/Month*
 \$200,000 for \$1,120/Month*
 *Terms and conditions apply.

Mafia Wars

Cash: \$3,791 Health: 42/100 Energy: 2/10 Stamina: 3/3 Experience: 10 Level: 1

[...]

Crime Jobs

Description / Payout	Job Requirements	Action
Mugging Payout: Experience: +1	Required: Energy: 1	Do Job
Corner Store Hold-up Payout: Experience: +3	Required: Energy: 3	Do Job
Warehouse Robbery Payout: Experience: +5	Required: Energy: 5	Do Job
Auto Theft Payout: Experience: +8	Required: Energy: 7 Mafia: 1	Do Job

Unlock more jobs when you reach level 5

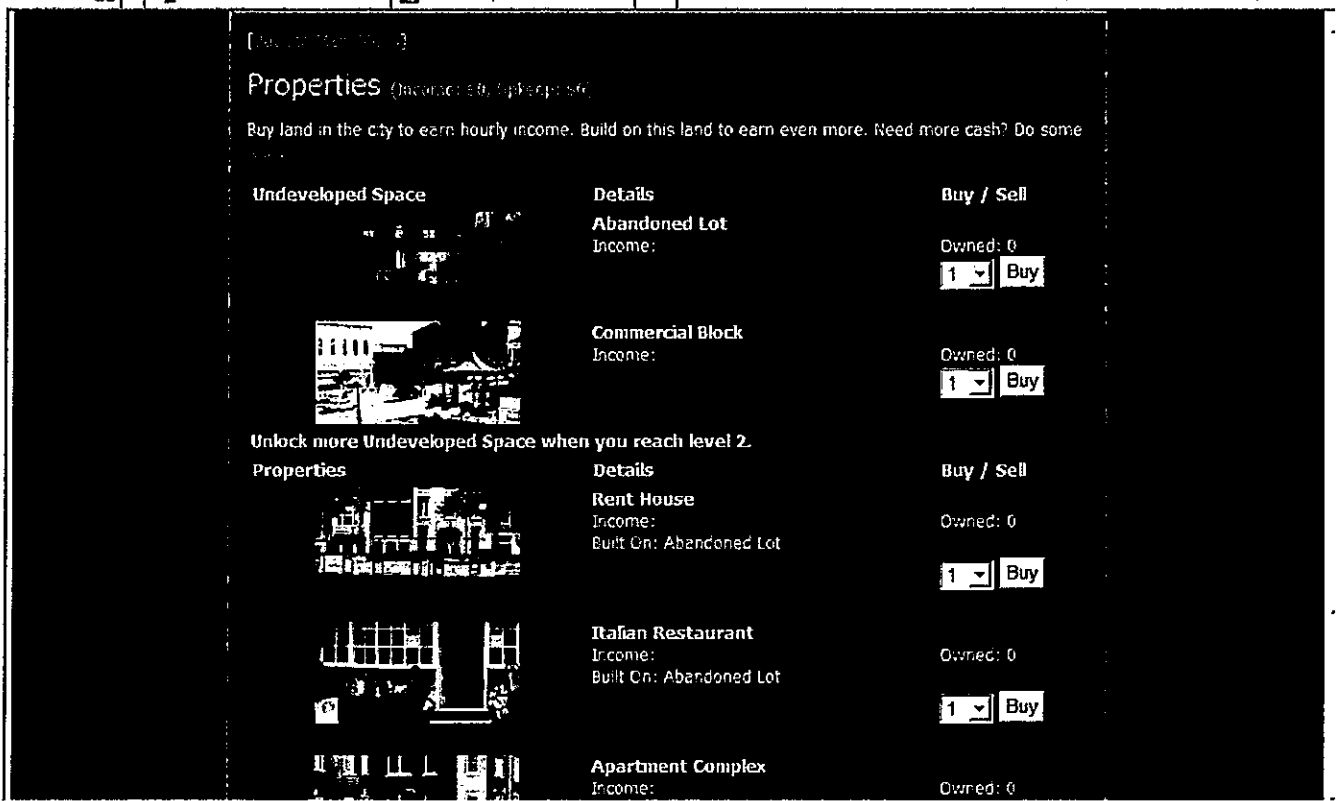
Descriptions of jobs have been changed everything else seems to be exactly the same including payout ranges, experience gained per job, requirements, etc.

THE CITY INTERFACE

Undeveloped Land	Details	Buy / Sell
	Empty Lot Income: \$100	Owned: 0 1 Buy
	City Block Income: \$300	Owned: 0 1 Buy
	Downtown Square Income: \$2000	Owned: 0 1 Buy
Establishment	Details	Buy / Sell
	Villa Income: \$300 Built On: Empty Lot	Owned: 0 1 Buy
	Restaurant Income: \$700 Built On: Empty Lot	Owned: 0 1 Buy
	Apartment Income: \$5000 Built On: City Block	Owned: 0 1 Buy

Online Friends (0)

Mob Wars City Interface



Above is the properties interface for mafia wars. Once again looks like all that was changed was the pictures and the descriptions pricing and layout are the same as mob wars.

THE BANK

Profile edit Friends ▾ Inbox ▾ home account privacy logout

You Have (1) IQ Challenge ➔] Accept Challenge

You have been challenged by a friend to beat their score of 115!

Mob Wars

Cash: \$3000 Health: 100/100 Energy: 10/10 Stamina: 3/3 Exp: 0 Level: 1

[]

The Bank (Account Balance: \$0)

You need at least \$10000 to open a bank account.

From Mob Wars Facebook.com

myspace.com Status: Inactive Mood: neutral Update

Home Ma Profile Friends Media Myspace TV More My Account Sign Out

Mafia Wars

MySpace Apps | View My Apps

House Payments Fall Again! Click Your State

AL AK AZ AR CA CO CT DC DE FL GA HI ID IL IN IA KS KY LA MEMO MA MI MN MO MT NE NV NH NJ NY NC ND OH OK OR PA RI SC SD TN TX UT VT VA WA WY WI WY

Mafia Wars

Cash: \$3,337 Health: 100/100 Energy: 10/10 Stamina: 3/3 Experience: 10 Level: 1

[]

The Bank

You need at least \$10,000 to open a bank account.

About | FAQ | Terms | Privacy Policy | Safety Tips | Contact MySpace | Advertise | MySpace International | MySpace Latino

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Internet 100%

From Mafia Wars myspace.com

Mafia Wars

Cash: \$3,337 Health: 100/100 Energy: 10/10 Stamina: 3/3 Experience: 10 Level: 1

[Home]

The Godfather (You have 10 reward points)

Check out the offers below to earn reward points you can spend with The Godfather. Each day, The Godfather will offer you rewards such as cash, special items, extra energy, family members, etc. in return for your reward points.

Offer	Action
The Godfather offers you \$10,000.	View Offer Status
The Godfather offers you 1 extra family member.	View Offer Status
The Godfather offers you 10 energy for 10 reward points.	View Offer Status

Earn reward point

Missing reward points? [Click here...](#)

[View Offer Status](#)

FEATURED OFFERS



Jamster Ringtones - Limited Time Offer!

Join the Jamster ringtone club and get wallpapers, ringtones and other great content for your mobile phone.

No Credit Card needed

Earn 85 reward points

Internet

The offers are basically the same as Mob wars. Some of the dollar amount for the first offer has been changed but everything else is the same including the quantity of reward points needed per offer. Note that the "view offer status" button is exactly the same as in mob wars. Also new players start with 10 points in both games.

THE HOSPITAL

You have been challenged by a friend to beat their score of 115!

Mob Wars

Cash: \$3000 Health: 56/100 Energy: 10/10 Stamina: 2/3 Exp: 0 Level: 1

[]

The Hospital

You can pay a doctor to regain your health. Doctors must be paid with clean money from your bank. You currently have 56 in the bank.

Do Healing:

Mafia Wars

Cash: \$3,337 Health: 41/100 Energy: 10/10 Stamina: 1/3 Experience: 10 Level: 1

[]

The Hospital

You can pay a doctor to increase your health. Doctors must be paid with clean money from your bank.

Healing:

THE STOCKPILE/INVENTORY

The Stockpile

Item Pic	Details	Buy / Sell
	Crowbar Attack: 1	Owned: 0 1 <input type="button" value="Buy"/>
	Baseball Bat Attack: 1 Defense: 1	Owned: 0 1 <input type="button" value="Buy"/>
	Colt 1911 Attack: 2 Defense: 2	Owned: 0 1 <input type="button" value="Buy"/>
	44 Magnum Attack: 3 Defense: 1	Owned: 0 1 <input type="button" value="Buy"/>
	Pump-Action Shotgun Attack: 2 Defense: 4	Owned: 0 1 <input type="button" value="Buy"/>
	Tommy Gun Attack: 3 Defense: 3	Owned: 0

Above from MobWars

Mafia Wars

Home | Profile | Inventory

Cash: \$3,337

Health: 100/100

Energy: 10/10

Stamina: 3/3

Experience: 10

Level: 1

[Previous Page]

Inventory

Item Pic

Details

Buy / Sell



Baseball Bat

Attack: 1

Defense: 0

Owned: 0

1



Crowbar

Attack: 1

Defense: 1

Owned: 0

1



Colt Pistol

Attack: 2

Defense: 2

Owned: 0

1



Sawed-off Shotgun

Attack: 3

Defense: 1

Owned: 0

1



Grenades

Attack: 2

Defense: 4

Owned: 0

1

Uses different picture and types of weapons compared to mob wars but all other values for the weapons are the same. If you descend down the list you will notice that the weapons cost the same and retain the same attack and defense value. For example the fourth weapon in both games cost \$2000 and has an Attack value of 3 and a Defense value of 1.

YOUR MOB/MAFIA

Mob Wars

Cash: \$3000 Health: 100/100 Energy: 10/10 Stamina: 3/3 Exp: 0 Level: 1

[]

Your Mob ()

You currently have no members in your mob.

To recruit your friends, select the pictures below. You will earn \$1000 for each friend that joins your mob. In order to build a successful mob, each day you should select all friends from below who are most likely to join.

Click the pictures of your friends, then invite them to join your mob. Earn \$1000 for each.

[Skip](#)

Add up to 16 of your friends by clicking on their pictures below.

Find Friends: Start Typing a Friend's Name

[View All](#)

Selected (0)

Unselected

Mafia Wars

Cash: \$3,337 Health: 100/100 Energy: 10/10 Stamina: 3/3 Experience: 10 Level: 1

[...]

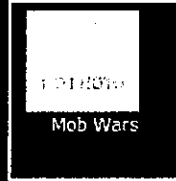
Your Mafia

Note: the current Mafia limit is 500.

Select your friends below to recruit them. In order to build a successful family, each day you should choose all friends from below who are most likely to join.

selected: 0/20

[Send Messages](#)



A little different since it is using myspace.com interface rather than facebook, but basically follows the same concept. You can add your friends to make your mob or family larger and stronger.

MOB BOSS/UPGRADES

[Profile](#) [edit](#) [Friends](#) ▾ [Inbox](#) ▾

[home](#) [account](#) [privacy](#) [logout](#)

- 1 New Offer -

(2) friends think you're dumber than George Bush

1 scored lower (112), 1 scored higher (132).

[Ads by Lookery](#)

Mob Wars

Cash: \$3000 Health: 100/100 Energy: 10/10 Stamina: 3/3 Exp: 0 Level: 1

[]

Your Mob Boss

You need 20 more experience points to get to the next level.

Attribute	Value	Description
Attack Strength	1	Attack points make your mob more effective when attacking other mobs
Defense Strength	1	Defense points make your mob more effective at defending from hostile mob attacks.
Max Energy	10	Increase your energy capacity to complete more jobs and other actions.
Max Health	100	Increase your max health to better survive intense fights.
Stamina	3	Increase your stamina to fight more often.

Be the King of Your Castle | BUILD YOUR OWN CASTLE | LendingTree | Refinance Loan: \$400,000 for \$2,240/Month* | \$300,000 for \$1,580/Month* | \$200,000 for \$1,120/Month* | *Terms and conditions apply.

DRAG HERE

Mafia Wars

Cash: \$3,337 Health: 100/100 Energy: 10/10 Stamina: 3/3 Experience: 10 Level: 1

[...]

Upgrades

You need 15 more experience points to get to the next level.

Attribute	Value	Skills needed	Description
Attack Strength	1	1	Attack points make your mob more effective when attacking other mobs.
Defense Strength	1	1	Defense points make your mob more effective at defending from hostile mob attacks.
Maximum Energy	10	1	Increase your energy capacity to complete more jobs and other actions.
Maximum Health	100	1	Increase your max health to better survive intense fights.
Maximum Stamina	3	2	Increase your stamina to fight more often. 2 skill points needed for increase!

Descriptions and values are duplicated verbatim. Mafia Wars refers to your group as family in the upgrades page it refers to the family as mob just like Mob Wars.

TOP MOBSTERS/FAMILIES

Top Mobsters			
Most Deadly	Kill Count	Top Fighters	Win Count
	21084		32671
	11232		31558
	8455		28533
	8392		27349
	7822		26125
	7520		
	7327		26102
	6579		23098
	6458		22901
	6429		22725
	6262		22426
	6242		21530
	6102		21125
	5838		20791
	5685		20650
	5675		20194
	5631		20074
	5448		19826
	5426		19628
	5169		19007
	5114		18997
	5002		18659
	4993		18614
	4903		18539
	4659		18513
			18497
Top Bounty Hunters	Head Count	Top Tycoons	Bank Funds
	4968		143255904802
	4889		140693697685
	4250		117154971720
	4043		112652353752
	3449		100000000000
	3223		89452545524
	2900		88400274932
	2812		88103041982
	2711		86147259235
	2646		81492915749
	2452		80756511543
	2423		80416068228
	2344		80119334583
	2301		79458268799
	2219		79318474456
	2121		78054251495
	2088		76993253853
	2077		76891154762
	2057		75981451109
	2046		75224841264
	2006		71852570356
	1955		71761022355
	1908		70982073143
	1886		70839676315
	1872		70484241043

Mob Wars

Mafia Wars

Cash: \$3,337 Health: 100/100 Energy: 10/10 Stamina: 3/3 Experience: 10 Level: 1

[Account Information]

Top Families

Most Deadly	Knock-out Count	Top Fighters	Win Count
	0	The Gentle Don	2528
%uFF39%uFF41%	0	ambino	1964
uFF53%uFF55		Giovanni	1943
Teddy Bear	0	Al Capowned	1800
	0	Marco Diarco	1770
kennta	0	Big Jer	1652
REMI	0	BLACK WIDOW'S	1371
DJ Johndice	0	Redman	1144
armondo	0	Reaper	1131
	0	CONRADO HERNANDO	1072
Vince	0	Ritzaeck	940
lil beezy	0	DOUBLE D INC!	917
Natural born killah	0	icuqtu	911
the killa	0	J-Dubb	867
The god-sister	0	FPR	827
Min Pin	0	Stilleto Killers	826
ATRON	0	big G	825
	0	kyshedevil	815
LEONI	0	wheezy	813
	0	D Mon	804
GodFather	0		
Top Bounty Hunters	Head Count	Top Tycoons	Bank Funds
icuqtu	248	Gar	\$99,999,999,999,999
babi boi	236	Jimmy "The Heat"	\$99,999,999,999,999
Marco Diarco	232	Roberto	
Reaper	208	Lil Savior	\$99,999,999,999,997
Bragole	117	Honeybun	\$99,999,999,997,498
bulls bitch	112	Spiked Heels	\$99,999,999,996,099
Leo Pondearin	111	Troy	\$99,999,999,995,974
CONRADO HERNANDO	102	Unleashed	\$99,999,999,995,049
Poppi	91	Big D	\$98,999,999,995,624
whacha weazin	88	Don Arturo de Ventresca	\$98,089,990,010,506
BULLIANO	85	Bragole	\$90,943,029,011,671
Isabella	85	Don Giovanni	\$90,901,970,470,647
The Gentle Don	84	Motello	\$90,003,953,524,762
rezzy	84	Fat Joe	\$90,003,664,697,397
MisterE	84	Big G	\$90,002,244,395,517
tomnio the godfather	82	the gangs men	\$89,999,947,386,961
vinnie_bagadonuts	78	Sabremanx	\$89,997,509,722,934
star	74	Zachery T Emory	\$89,940,356,833,976
crazyblonde	72	M.O.D	\$89,732,859,079,251
Cobra	69	[\$mitty]-%u2122	\$88,199,980,797,456
		d Rizzock	\$87,859,625,702,635

This page follows the same format as Mob Wars. "Kill Count" was changed to "Knock-out Count" all other categories are the same. This page displays players with the highest scores in each category.