

January 8, 2003

Martin Elliot
Director of Corporate Risk Management, Visa USA
Visa Towers
900 Metro Center Blvd
Foster City, CA 94404

Dear Mr. Elliot:

My name is Daniel Cooper, General Counsel for PERFECT 10 Magazine.

PERFECT 10 Magazine salutes your recent efforts to reduce fraud on the Internet. We believe that you could cause a further significant decline in illegal activity, and consequently charge backs, by terminating billing services for a readily identifiable category of websites that traffic in so-called celebrity pornography. These websites are comprised almost entirely of obviously stolen intellectual property and are likewise engaged in other deceptive schemes that damage consumers and, through charge backs, credit card companies.

The celebrity pornography sites that Mastercard and Visa are currently supporting consist virtually in their entirety of obviously stolen property in the form of (i) images that infringe the copyrights of legitimate publishers and entertainment companies; (ii) images that infringe the rights of publicity of well-known celebrities and models; and (iii) "fake" images that superimpose the face of a celebrity on another person posing nude or in sexual activity, so that it falsely appears that the celebrity is engaged in sexual activity or is otherwise posing nude.

Celebrity websites also consistently engage in countless other forms of consumer fraud, such as charging the consumer for more memberships than he purchases, registering the consumer in more websites than the consumer intends to join, using different opening pages to sell the same sites as different sites, etc. Some of these practices are described more specifically below.

The unlawful nature of these celebrity websites and the deceptive schemes they perpetrate was decidedly confirmed by the recent decision of the United States District Court for the Central District of California in *Perfect 10, Inc. v. Cybernet Ventures, Inc.*, 213 F.Supp.2d ___ (April 27, 2002). In that case, the Court preliminarily enjoined a billing/customer service portal site from linking to celebrity websites or permitting such deceptive promotions on the network, and required the billing site to monitor on an

EXHIBIT 2

ongoing basis the more than 300,000 websites to which it linked to insure that they did not display such content in the future.

These types of deceptive and unlawful activities on celebrity adult websites result in consumer resistance to using the Internet to purchase goods and services, and causes substantial charge backs for credit card companies. As the Attorney General of the State of Michigan recently explained in forceful terms, such websites could not continue to engage in unlawful conduct on the Internet if legitimate businesses refused to support their illegal activities.¹

Consumer Fraud on Purported Celebrity Websites

Most celebrity websites induce consumers to join the site based on fraudulent representations regarding the content on the site. Promotions on the home pages of such websites, in search engine results, and on banners, falsely promise, for example, such offensive content as the following: “Britney and Christina, their first time oral sex” (from the TrueCelebs.com website); “Alica Silverstone pussy video shot” (from the celebwood.com website); “Barbara Streisand Porno!” (from the celebmovie.com website); “Elle McPherson and babysitter filmed fucking and masturbating”(from the Call-girls.net website); “See the hottest female tennis player get both holes penetrated at once!” (from the Celebrityorgy.com website). No such content exists. Home and tour pages from these websites are enclosed as Appendix A.

As one reasonably would expect, these unlawful sites also engage in other deceptive practices. Some celebrity websites falsely represent that they are free, when in fact they are not. Some celebrity websites operate under different domain names (with common links and advertisements) but offer the same content—in order to deceive consumers into paying multiple subscriptions for access to the same content. As I am confident you know, still other celebrity sites fraudulently bill consumers for purchases they have not made. Appendix B shows the home pages of four websites that (a) have stolen celebrity content, (b) falsely claim to be free, (c) misrepresent the amount of content on the sites, and (d) sell access to the same content. The charge backs from these websites could be a surprise to no one.

Celebrity Websites Consist Only of Stolen Content and are Readily Identifiable

There are thousands of infringing celebrity websites on the Internet. Virtually all of the content on these websites is stolen. Celebrity images on the sites consist of

¹ The Attorney General’s remarks were in the related context of child pornography: “These Internet billing companies are greasing the wheels of the Internet’s child porn industry. Their ability to turn a blind eye toward their clients’ exploitation of children is about to come to a screeching halt. These companies are acting as the Keepers of the Keys to child porn websites across the globe—they’re now on notice that if they choose not to take responsibility for their actions, we’ll take them to criminal court.”

unauthorized images taken from magazines and films. Often the images superimpose the face of a celebrity on the body of a model, so that the celebrity is falsely portrayed as appearing nude. Still other websites contain none of the advertised content (*infra*). Celebrity content on these websites infringes the copyrights of publishers and film companies, and infringes the rights of publicity of the celebrities and models that are pictured. These websites also unfairly compete with legitimate publishers of adult entertainment, such as Playboy and Perfect 10.²

Celebrity websites with stolen content are readily identifiable by examining their domain names or homepages, and/or using search engines. For example, search engine queries using a celebrity name such as "Britney Spears" and "nude" will result in a listing of numerous sites claiming to have nude images of Ms. Spears, even though no such images exist and even though she has not authorized the use of her name to promote these websites.³ Many of these listed websites contain fake images of Ms. Spears—e.g., images superimposing Ms. Spears face on an image of a nude body, so that the consumer believes he is viewing a genuine image of Ms. Spears. Other listed websites do not contain the advertised content or include only non-nude, unauthorized images of Ms. Spears.

The first pages of searches on "Britney Spears" and "nude" for Yahoo and Overture are shown in Appendix C. Although such a search yields listings of what appears to be thousands of websites, often times such "sites" are actually just different "front ends" leading toward the same content, run by the same unscrupulous operators. Examples of fakes which appear on such sites are shown in Appendix D.

It is well known in the publishing and entertainment businesses that celebrities and entertainment companies do not license their intellectual property rights to adult entertainment websites. All of these websites are willful infringers, violating both civil and criminal statutes. Appendix E includes declarations of (i) celebrities (or their agents) featured on the websites identified in Appendix A, (ii) experts in the entertainment industry, and (iii) an Internet content broker, all of which establish that celebrity content on these websites is unauthorized.

As stated above, although there are thousands of illegal celebrity websites, there are only a few large unscrupulous operators who own most of the pay sites. These webmasters could not continue their unlawful activities on the Internet if financial institutions refused to process payments for their unlawful sites.

² Perfect 10 publishes "softcore" pictures of models, in both PERFECT 10 Magazine (enclosed), and on Perfect 10's website, located at www.perfect10.com. It has been featured in prominent movies and television shows such as "The Sopranos," "Spiderman," "American Pie," "Hollow Man," "Dawson's Creek," "The Tonight Show," and "Monday Night Football."

³ Although it is widely known that celebrities do not authorize the use of content concerning them to adult entertainment websites, I enclose declarations by Ms. Spears and her attorney attesting to these facts in Appendix E.

False Registrations of Purported Celebrity Websites

Celebrity websites frequently register on the Internet under false identifications. Most celebrity websites also are registered outside the U.S. to help avoid liability. Thus, there is no effective recourse against the illegal activities of such websites other than through the financial institutions that process their payments.

Appendix F includes a list of a number of the large illegal celebrity sites, along with their registered addresses and phone numbers. The list is sorted by registered address. Sites with the same address typically are owned by the same webmaster and deceive consumers with different "front ends" that lead to the same content. That would be the case with sites like 007celebsnude and allnudecelebritiesxxx.com which have registered addresses of Belize City, BZ BZ BZ with phone numbers of 000-000-0000. Other sites with similar addresses and content include rogerceleb and truecelebs (allegedly in Curacao); celebfales.com and highsocieties.com, with registered addresses of Grand Turk, TC and phone numbers of 999-999-9999; celebfa.com and nakedcelebritypics.com, with registered addresses in The Valley AI, and phone numbers of 123-456-7890; and celebrymembers.com and celebrity-xxx.com with registered addresses of Port Vila, VU NA VU, to name a few. On appendix F, a notation of "F" indicates a foreign or phony registration, and a notation of "F*" indicates a registration that we strongly believe is fraudulent, in that the entity registered and its location is not really the entity and location that controls the site. A notation of "P" indicates that the registered phone number does not work.

Only an honest Internet will allow online commerce to flourish and permit the Internet to remain free of governmental regulation. Plainly, the common ingredient to the success of the illegal activities summarized above is the flow of payments from consumers to the wrongdoing celebrity webmasters. The financial institutions processing these payments have the power to prevent such illegal activities by refusing to process payments for these readily identifiable unauthorized celebrity websites.

Perfect 10 has done a great deal of work investigating illegal celebrity websites. We are willing to share our databases and our knowledge with you. We believe that by refusing to support illegal celebrity websites, you will greatly reduce theft and fraud on the Internet.

Very truly yours,

Daniel J. Cooper

REDACTED
ATTORNEY-CLIENT PRIVILEGE

-----Original Message-----

From: Dan Cooper [mailto:Dan@perfect10.com]

Sent: Thursday, February 06, 2003 4:13 PM

To: 'melliott@visa.com'

Cc: 'skoppol@visa.com'

Subject: Perfect 10 follow-up

Dear Mr. Elliot:

Pursuant to our conversation of a couple of weeks ago—in which you promised that a response from VISA would be shortly forthcoming—I am writing as a follow up to determine what steps VISA has taken, if any, since our last communication, to reduce fraud and copyright infringement on the Internet.

As you may recall, we suggested to you that VISA should not process payments for, or otherwise

2/6/2003 5:54 PM

commercially support, websites that are engaged in obvious illegal activities. We further suggested that to that end, there are two types of websites that should immediately raise a red flag: websites with obviously bogus registrations and websites with obviously stolen celebrity content.

Among the sites we pointed out to you for illustrative purposes were (i) celebwood.com, which openly admits that it does not own its content and advertises “50,000 never before seen nude celebrities pictures;” (ii) celebmovie.com, which also admits that it does not own its content and advertises “Heather Locklear Blowjob!” and “Jenny McCarthy Gang-Bang” on its home page; and (iii) Allnudecelebritiesxxx.com, which advertises “70,000 Celeb Pics” and “Stolen Videos,” and which has a registration address of Belize City, BZ, BZ. Unfortunately, it appears these sites are still up and billing through VISA.

As I am sure you realize by now, PERFECT 10 is vigorous when it comes to protecting its core asset—its intellectual property. We have successfully concluded litigation against one of the largest amalgamators of adult content on the Internet, Cybernet Ventures. Moreover, we currently have separate actions pending against another operator of similar magnitude, Net Management Services, as well as prominent billing companies such as CCBill and IBill. In order to completely eradicate this epidemic of theft and fraud, however, we ultimately need help from you.

To reiterate, one simple way you can provide such help, and at the same time, reduce the overall number of charge backs from fraud, is to simply demand accurate registration information. Without accurate registration information, it is extremely difficult if not impossible for copyright holders such as PERFECT 10 to protect their rights. As an example, in connection with the aforementioned lawsuits, we have sued a number of related entities, but due to bogus registration addresses, have been unable to serve them. We have also received little, if any, help from the billing companies in this regard. At the minimum, when websites are listed in complaints and cannot be served, billing companies with whom VISA and Mastercard work should be required to provide the correct address and ownership information for such websites rather than shielding them from the reach of the law.

We are eagerly awaiting your response to our previous letters and any new regulations that you are contemplating to reduce the massive copyright infringement and fraud that currently pervades the Internet. PERFECT 10 has done a great deal of work in this area and we would be happy to provide you with any information that could be of assistance.

Sincerely,

Daniel J. Cooper

PERFECT 10 Magazine

Daniel J. Cooper

Perfect 10 Magazine

Direct- (310) 205-9817

Toll Free- (800) 606-6639

Fax- (310) 205-9638

Email- dan@perfect10.com

NOTICE: This message is intended only for the addressee and may contain information that is privileged, confidential and/or attorney work product. If you are not the intended recipient, do not read, copy, retain or disseminate this message or any attachment. If you have received this message in error, please call the sender immediately at (310) 205-9817 and delete all copies of the message and any attachment. Neither the transmission of this message or any attachment, nor any error in transmission or misdelivery shall constitute waiver of any applicable legal privilege.

Dear Mr. Elliot,

Forgive what must appear like my impatience, but given the severity of the problem I have previously communicated with you about, I felt I had no other choice than to follow-up with you even in advance of receiving your promised response.

To reiterate, our view is that VISA, as well as Mastercard, should not be working with sites with obviously stolen celebrity content, and well as sites with obviously phony registrations. The current situation is basically out of control, and without the help of VISA and Mastercard, massive misappropriation of intellectual property and consumer fraud will continue unabated. Right now, we estimate that billions of dollars of intellectual property are being stolen with the assistance of Mastercard and VISA. We believe that you have an obligation to not knowingly assist and profit from such illegal activity.

Although I realize that by now we have probably over-saturated you with examples of websites engaged in consumer fraud, allow me to identify just a few more truly egregious ones for purposes of illustration. Probably the most brazen example of consumer fraud coupled with copyright infringement can be seen on the sites xxxpassport.com and xxxcelebpass.com. Both of these sites start off with the claim that “your free passport includes access to over 50,000 sites!” In fact, however, the access to 50,000 sites is not free. Secondly, every “site” goes to exactly the *same* URL, tempted.com, whether the “site” claims to be gay or straight, Latina or hardcore! Tempted.com, the common destination for all these URLs, is a den of illegal content. For example, it includes about 200 fake nude images of Britney Spears. As you’ll recall, we have already sent you a declaration from Ms. Spears indicating that she has not authorized any porn site to use her name and/or images.

The creators of this obvious consumer fraud have taken it a step further. Along the way to getting to tempted.com—which a consumer arrives at under the mistaken impression that he/or she is actually getting access to *different* sites¹—the consumer is also tricked into unknowingly joining more sites. Typical methods of tricking consumers into

¹ The following sites can all be joined separately via different “front ends” and all go to the same underlying site, tempted.com: evilescorts.com, tempted.com, celebt taboo.com, 14inch.com, babylon-x.com, amateurfanclub.com, amateurtour.com, americanjock.com, americantranssexuals.com, americantwink.com, amsterdamtonight.com, analteeners.com, asianslit.com, asianstud.com, asiantime.com, baldbeaver.com, bigandbad.com, bizarrefisting.com, blackonwhite.com, blowqueen.com, camgang.com, camphoney.com, cummania.com, exsluts.com, fatoldwhores.com, foxymania.com, freakview.com, frenchteenies.com, greasyteens.com, hotpinkbikini.com, indianhussies.com, leatherfanclub.com, lesbianfanclub.com, peefantasy.com, pornfanclub.com, sexpots.com, sexsmoke.com, soloteenies.com, tittyville.com, toylandsluts.com, trannyfantasy.com, vulgarteens.com, and wildflics.com.

unwittingly joining other sites involve using small checked boxes which must be unchecked or else you are automatically joined, presenting the consumer with an apparent free "bonus site" which seems to be free but is not, and requiring the consumer to upgrade after he joins the first site.

Other, similar examples of fraud abound. Kinki-celebz.com and easycelebs.com also resolve to the same content but via a seemingly different billing company. They say the subscription is free but then they charge you \$2.68 anyway. They also try to trick the consumer into a \$39.95 upgrade. Also, realcelebs.com, 007celebsnude.com, upskirtcelebs.com, nudecelebnetwork.com, allnudecelebritiesxxx.com, celeblover.com, 100% Pamela Anderson Nude, celebteens.com, and celebvideovault.com all resolve to the same content as well, but try to trick the consumer by advertising different prices. For example, realcelebs.com is \$18.49 a month while upskirtcelebs.com is \$19.95 a month. Nonetheless, both resolve to the same content. All of these websites are registered in Belize City, BZ BZ BZ.

I could keep going with further examples but will spare you. With each such example, however, the bottom line remains the same—it is impossible for legitimate businesses like Perfect 10 to compete against entities that steal their content while we have to pay for ours.

We would hope that your company would do the right thing and stop processing credit cards for entities that are selling obviously stolen materials and/or have obviously phony registrations. Once again, for your convenience, I have attached a spreadsheet that we sent before with a listing of sites that we believe offer stolen materials. As these sites are prone to change on a frequent basis, we would suggest that before you take any action based on this letter, you determine for yourselves the accuracy of our claims.

Very Truly Yours,

Daniel J. Cooper
General Counsel, Perfect 10, Inc.

Subject:

Date: Fri, 21 Feb 2003 13:05:09 -0800

From: "Dan Cooper" <Dan@perfect10.com>

To: <noah_hanft@mastercard.com>, <noah-hanft@mastercard.com>

Dear Mr. Hanft:

Attached please find a letter regarding fraud and illegal activity on the Internet about which Mastercard should be concerned. Also attached hereto is an excel spreadsheet which is Exhibit F to this letter. Exhibits A through E (and another copy of Exhibit F), along with a hard copy of this letter, are concurrently being sent to you, via Federal Express.

Thank you.

Daniel J. Cooper

Perfect 10 Magazine


Direct- (310) 205-9817


Toll Free- (800) 606-6639

Fax- (310) 205-9638

Email- dan@perfect10.com

NOTICE: This message is intended only for the addressee and may contain information that is privileged, confidential and/or attorney work product. If you are not the intended recipient, do not read, copy, retain or disseminate this message or any attachment. If you have received this message in error, please call the sender immediately at (310) 205-9817 and delete all copies of the message and any attachment. Neither the transmission of this message or any attachment, nor any error in transmission or misdelivery shall constitute waiver of any applicable legal privilege.

 MasterCard Letter 1.doc	Name: MasterCard Letter 1.doc Type: WINWORD File (application/msword) Encoding: base64
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 <u>phonyregformastcola.xls</u>	Name: phonyregformastcola.xls Type: Microsoft Excel Worksheet (application/vnd.ms-excel) Encoding: base64
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February 21, 2003

Noah J. Hanft
General Counsel
MasterCard International
2000 Purchase Street
Purchase, New York 10577-2509

Dear Mr. Hanft:

My name is Daniel Cooper, General Counsel for PERFECT 10 Magazine.

PERFECT 10 Magazine salutes your recent efforts to reduce fraud on the Internet. We believe that you could cause a further significant decline in illegal activity, and consequently charge backs, by terminating billing services for a readily identifiable category of websites that traffic in so-called celebrity pornography. These websites are comprised almost entirely of obviously stolen intellectual property and are likewise engaged in other deceptive schemes that damage consumers and, through charge backs, credit card companies.

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The unlawful nature of these celebrity websites and the deceptive schemes they perpetrate was decidedly confirmed by the recent decision of the United States District Court for the Central District of California in *Perfect 10, Inc. v. Cybernet Ventures, Inc.*, 213 F.Supp.2d ___ (April 27, 2002). In that case, the Court preliminarily enjoined a billing/customer service portal site from linking to celebrity websites or permitting such deceptive promotions on the network, and required the billing site to monitor on an

ongoing basis the more than 300,000 websites to which it linked to insure that they did not display such content in the future.

These types of deceptive and unlawful activities on celebrity adult websites result in consumer resistance to using the Internet to purchase goods and services, and causes substantial charge backs for credit card companies. As the Attorney General of the State of Michigan recently explained in forceful terms, such websites could not continue to engage in unlawful conduct on the Internet if legitimate businesses refused to support their illegal activities.¹

Consumer Fraud on Purported Celebrity Websites

Most celebrity websites induce consumers to join the site based on fraudulent representations regarding the content on the site. Promotions on the home pages of such websites, in search engine results, and on banners, falsely promise, for example, such offensive content as the following: "Britney and Christina, their first time oral sex" (from the TrueCelebs.com website); "Alica Silverstone pussy video shot" (from the celebwood.com website); "Barbara Streisand Porno!" (from the celebmovie.com website); "Elle McPherson and babysitter filmed fucking and masturbating" (from the Call-girls.net website); "See the hottest female tennis player get both holes penetrated at once!" (from the Celebrityorgy.com website). No such content exists. Home and tour pages from these websites are enclosed as Appendix A.

As one reasonably would expect, these unlawful sites also engage in other deceptive practices. Some celebrity websites falsely represent that they are free, when in fact they are not. Some celebrity websites operate under different domain names (with common links and advertisements) but offer the same content—in order to deceive consumers into paying multiple subscriptions for access to the same content. As I am confident you know, still other celebrity sites fraudulently bill consumers for purchases they have not made. Appendix B shows the home pages of four websites that (a) have stolen celebrity content, (b) seem to be different but lead to the same content c) try to trick the consumer into paying for more memberships, d) have false registrations in Belize City, BZ.

Celebrity Websites Consist Only of Stolen Content and are Readily Identifiable

There are thousands of infringing celebrity websites on the Internet. Virtually all of the content on these websites is stolen. Celebrity images on the sites consist of

¹ The Attorney General's remarks were in the related context of child pornography: "These Internet billing companies are greasing the wheels of the Internet's child porn industry. Their ability to turn a blind eye toward their clients' exploitation of children is about to come to a screeching halt. These companies are acting as the Keepers of the Keys to child porn websites across the globe—they're now on notice that if they choose not to take responsibility for their actions, we'll take them to criminal court."

unauthorized images taken from magazines and films. Often the images superimpose the face of a celebrity on the body of a model, so that the celebrity is falsely portrayed as appearing nude. Still other websites contain none of the advertised content (*infra*). Celebrity content on these websites infringes the copyrights of publishers and film companies, and infringes the rights of publicity of the celebrities and models that are pictured. These websites also unfairly compete with legitimate publishers of adult entertainment, such as Playboy and Perfect 10.²

Celebrity websites with stolen content are readily identifiable by examining their domain names or homepages, and/or using search engines. For example, search engine queries using a celebrity name such as "Britney Spears" and "nude" will result in a listing of numerous sites claiming to have nude images of Ms. Spears, even though no such images exist and even though she has not authorized the use of her name to promote these websites.³ Many of these listed websites contain fake images of Ms. Spears—e.g., images superimposing Ms. Spears face on an image of a nude body, so that the consumer believes he is viewing a genuine image of Ms. Spears. Other listed websites do not contain the advertised content or include only non-nude, unauthorized images of Ms. Spears.

The first pages of searches on "Britney Spears" and "nude" for Yahoo and Overture are shown in Appendix C. Although such a search yields listings of what appears to be thousands of websites, often times such "sites" are actually just different "front ends" leading toward the same content, run by the same unscrupulous operators. Examples of fakes which appear on such sites are shown in Appendix D.

It is well known in the publishing and entertainment businesses that celebrities and entertainment companies do not license their intellectual property rights to adult entertainment websites. All of these websites are willful infringers, violating both civil and criminal statutes. Appendix E includes declarations of (i) celebrities (or their agents) featured on the websites identified in Appendix A, (ii) experts in the entertainment industry, and (iii) an Internet content broker, all of which establish that celebrity content on these websites is unauthorized.

As stated above, although there are thousands of illegal celebrity websites, there are only a few large unscrupulous operators who own most of the pay sites. These webmasters could not continue their unlawful activities on the Internet if financial institutions refused to process payments for their unlawful sites.

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False Registrations of Purported Celebrity Websites

Celebrity websites frequently register on the Internet under false identifications. Most celebrity websites also are registered outside the U.S. to help avoid liability. Thus, there is no effective recourse against the illegal activities of such websites other than through the financial institutions that process their payments.

Appendix F includes a list of a number of the large illegal celebrity sites, along with their registered addresses and phone numbers. The list is sorted by registered address. Sites with the same address typically are owned by the same webmaster and deceive consumers with different "front ends" that lead to the same content. That would be the case with sites like 007celebsnude and allnudecelebritiesxxx.com which have registered addresses of Belize City, BZ BZ BZ with phone numbers of 000-000-0000. Other sites with similar addresses and content include rogerceleb and truecelebs (allegedly in Curacao); celebfales.com and highsocieties.com, with registered addresses of Grand Turk, TC and phone numbers of 999-999-9999; celebfan.com and nakedcelebritypics.com, with registered addresses in The Valley AI, and phone numbers of 123-456-7890; and celebritymembers.com and celebrity-xxx.com with registered addresses of Port Vila, VU NA VU, to name a few. On appendix F, a notation of "F" indicates a foreign or phony registration, and a notation of "F*" indicates a registration that we strongly believe is fraudulent, in that the entity registered and its location is not really the entity and location that controls the site. A notation of "P" indicates that the registered phone number does not work.

Only an honest Internet will allow online commerce to flourish and permit the Internet to remain free of governmental regulation. Plainly, the common ingredient to the success of the illegal activities summarized above is the flow of payments from consumers to the wrongdoing celebrity webmasters. The financial institutions processing these payments have the power to prevent such illegal activities by refusing to process payments for these readily identifiable unauthorized celebrity websites.

Perfect 10 has done a great deal of work investigating illegal celebrity websites. We are willing to share our databases and our knowledge with you. We believe that by refusing to support illegal celebrity websites, you will greatly reduce theft and fraud on the Internet.

Very truly yours,

Daniel J. Cooper

PERFECT 10, INC.

FACSIMILE TRANSMITTAL SHEET

TO:	Noah J. Hanft	FROM:	Daniel J. Cooper
COMPANY:	MasterCard International	DATE:	3/7/2003
FAX NUMBER:	(914) 249-4262	TOTAL NO. OF PAGES INCLUDING COVER:	3
PHONE NUMBER:	[Click here and type phone number]	SENDER'S REFERENCE NUMBER:	[Click here and type reference number]
RE:	New Visa Regulations Governing Celebrity Porn Sites	YOUR REFERENCE NUMBER:	[Click here and type reference number]

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

NOTES/COMMENTS:

Dear Mr. Hanft:

As you may recall, on February 21, 2003, I sent you a letter regarding the ongoing illegal activity that is occurring on the Internet in connection with so called "celebrity porn" websites. A similar letter was sent to Martin Elliott, the Director of Corporate Risk Management at VISA USA. Attached hereto please find his response, which announces VISA's promulgation of new regulations specifically designed to combat this brand of illegal activity. It is our sincere hope that MasterCard will follow suit and adopt the same.

I look forward to hearing back from you.

Sincerely,

Daniel J. Cooper

General Counsel
Perfect 10, Inc.

[CLICK HERE AND TYPE RETURN ADDRESS]

Subject: [Fwd: Member Sign Up Notification]
Date: Wed, 19 Mar 2003 00:04:19 -0800
From: Norman Z <normanz@earthlink.net>
To: adam.herbert@firstdata.com

Dear Mr. Herbert,

I am forwarding this email from iBill. Notice that at the bottom, it says "Please allow 24 hours from the time of purchase before attempting to cancel your subscription."

Looks to me like they are trying to prevent consumers from cancelling their memberships when they realize that they don't want the trial to convert into a \$49.95 a month membership. Is this allowed under VISA guidelines?

Sincerely,

Norm Zadeh, Ph.D.

Subject: Member Sign Up Notification
Date: Tue, 18 Mar 2003 19:35:59 -0500
From: "iBill Customer Service" <customercare@ibill.com>
To: <normanz@earthlink.net>

iBill Receipt

Norman Zadeh
72 Beverly Park
Beverly Hills, CA 90210
US

Dear Norman,

We appreciate your purchase on <http://www.adultcinema.org>.

Web Site Name: Adult Cinema
Purchase Date/Time: 3/18/2003 7:31:07 PM

Subject: List of infringing sites
Date: Sun, 16 Mar 2003 23:10:37 -0800
From: Norman Z <normanz@earthlink.net>
To: adam.hebert@firstdata.com

Dear Mr. Hebert,

Thank you again for taking a hard look at celebrity websites with obviously stolen content which may also have phony registrations.

Attached is a list of 247 celebrity sites that we believe infringe the copyrights of film studios, magazines, celebrities, and other copyright holders.

An F indicates a foreign registration. An F* indicates a registration which we believe does not represent the actual business location. Sites with the same number in column 5 generally lead to the same content, which we believe is a form of consumer deception. A "U" means that the consumer must uncheck a box to avoid additional payment or is otherwise misled or tricked into additional payments that they did not contemplate.

While there are other sites with stolen material, the attached list includes most of the bigger players. We have not listed all the sites which mislead consumers. If you would like us to do so, please let me know.


As you probably know, it is our position that VISA and MASTERCARD should not be processing credit cards for sites with obviously stolen content. If there is any question, we would suggest that the webmaster be asked to produce model releases and photographer agreements. We are quite certain, however, that there is no legal source of celebrity content for use on pornographic websites.

Because sites change, some of the attached sites, like celeb18.com and celebrityskank.com, may no longer have stolen content. So we would suggest that everyone have a chance to prove that they own their content before their billing privileges are terminated.

Thank you again for your concern in this matter.

Sincerely,

Norm Zadeh, Ph.D.
PERFECT 10 Magazine

 phonyregformastcola.xls	Name: phonyregformastcola.xls Type: EXCEL File (application/msexcel) Encoding: base64
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Subject:

Date: Sun, 13 Apr 2003 18:12:28 -0700
From: "Dan Cooper" <Dan@perfect10.com>
To: <adam.herbert@firstdata.com>
CC: "Elliott, Martin" <melliott@visa.com>, <allenp@visa.com>

Dear Mr. Hebert,

My name is Daniel J. Cooper and I am General Counsel for Perfect 10, Inc. ("Perfect 10"). I am following up with you regarding communications you have had with Dr. Norman Zadeh, President of Perfect 10, concerning celebrity porn sites.

As you know, on February 24, 2003, Martin Elliott of VISA wrote me a letter (on which you were copied) announcing new VISA regulations with respect to celebrity porn sites. Such regulations require, among other things, Visa Members who process transactions for such websites to (1) confirm to VISA that such websites are not selling "illegal" (i.e., infringing) material, and (2) validate the ownership of such websites.

The following is a list of celebrity websites that we believe contain infringing material; this list has been updated from the one Dr. Zadeh previously sent you. In light of the new VISA regulations, will you please let us know what actions First Data intends to take with respect to any of the following websites for which it processes transactions?

Thank you for your cooperation in this matter.

Sincerely,

Daniel J. Cooper

PERFECT 10 Magazine

007celebsnude.com

1000-celebs.com

100percent-nude-celebs-dom 101-all-nude-naked-celebrity-pics-gallery-sex-mpeg.com

1nudebritneyspearsnaked.com 1-nude-female-celebrity-babes-sex.com

1stcelebs.com
addictivebeauties.com
adorablestars.com
adultcinema.org
adultfreespace.com
adultkey.com
agekey.com
allcelebrities.net
all-naked.com
allnakedcelebs.net
allnudecelebritiesxxx.com
allstarnudecelebs
angelfire.com
animald.com
babecollection.com
babesofbabylon.com
babylon-x
badstars.com
barecelebrities.com
bashfulmonkey.com
bizarrefisting.com
blissettscan.com
boogietown.com
britney-spears-nude.illegal.net
call-girls.net
caught-celebs.com
cclbl.com
celebl8.com
celebcaughtnaked.com
celebclub.com
celebcollections.com
celebdb.com

celebdrive.com
celebexclusive.com
celebfakes.com
celebfan.com
celeb-fan.com
celebfantasy.com
celebgallery.com
celebhotel.com
celeblover.com
celebmovie.com
celebnakedness.com
celeborama.com
celebplaza.com
celebpornsite.com
celebrities.com
celebrity-archives.com
celebritybrowser.com
celebritybuzz.net
celebritychamber.com
celebritycollection.com
celebrity-collection.com
celebritycollections1.com
celebritycontest.com
celebrityexposure.com
celebrityextreme.com
celebrityfakes.com
celebrityflicks.com
celebrityhardcore.com
celebrityicon.com
celebrityking.com
celebritymembers.com

celebritynet.com
celebritynudeclub.com
celebrity-nude-pictures.com
celebrityonly.com
celebrityorgy.com
celebritypass.com
celebrity-review.com
celebritysexfest.com
celebrityskank.com
celebritysleaze
celebritystar.com
celebritysun.com
celebrityupskirtpictures.com
celebrityvideos.com
celebrityvisions.com
celebrity-voyeur.com
celebrity-xxx
celebrity-youth.com
celebscaughtnaked.com
celebscaughtnude.com
CELEBSCITY.NET
celebs-club
celeb-search.com
celeb-server.com
celebsexposed.com
celebshocker.com
celebshop.com
celebshunter.com
celebs-inc.com
celebs-n-vintage.com
celebs-online.com
celebsontheweb.com

celebstv.com
celebsunlimited.com
celebsxposed.com
celebta.com
celebtaboo.com
celebteens.com
celebticket
celebticket.com
celebvideovault.com
celebwood.com
celeb-xxx.com
cinema-stars.com
click4celebs.com
cnma.com
cool-celebs.com
cravings.net
crazyacefakes.com
cybererotic.com
dailynudecelebs.com
digital-web.net
dirty-celebs.com
draugen.com
dreamstarlets.com
easycelebs.com
eroticcelebs.com
evilescorts.com
Exclamation-fake-celebs.com
exclusivecelebporn.com
exposedcelebrity.com
exposedgroup.com
exsluts.com

fakeclub.com
fakeclub.com
fakir.net
famoussleaze.com
femalecelebrities.com
femalestars.com
fillies.com
fredd38.net
freecelebbabes.com
freecelebnudity.com
hardcorecelebrity.com
hiddenhollywood.com
highsocieties.com
hollycelebs.com
hollywoodextreme.com
Hollywoodfakes.com
hollywoodfiles.com
hollywoodstrip.com
hollywoodwhores.com
hostxxxxtreme.com
hotcelebnews.com
hotcelebnudes.com
houseofvictoria.com
Illegal.net
Inca69.com
internetmovies.com
internetstars.com
iwantcelebs.com
jadesmovies.com
kinki-celebz.com
lairofluxlucre.com
latinofantasy.com

LeNichon.com
lifetimebucks.com
loveanddates.com
marilyns.com
massivepass.com
matrixcelebs.com
modelcelebs.com
modelsfactory.com
moviestarsnude.com
mrskin.com
mufor.org
musicmoviesbooks.com
nakedcelebritypics.com
nakedimages.com
naked-nude-celebs.com
naked-stars.com
naughty-celebs.com
nekkidcelebs.com
newceleb.com
newcelebpics.com
nitrovideo.com
Nudeandnakedcelebs.com
nude-britney-spears-pics.com
nude-britney-spears-pics.com
nudecelebnetwork.com
nudeceleboutpost.com
nudecelebritie.com
nudecelebrityfiles.com
nudecelebritytheater.com
nudecelebs.org
nude-celebs.org

nudecelebsrevue.com
nudeceleburties.com
nudefakecelebs.com
nudehollywood.com
nude-naked-celebrities.com
nude-scenes.com
nude-supermodels.com
nudetrek.com
paparazzifilth.com
payones.com
pichound.com
popstars.com
primecelebrity.com
private-content.com
rarecelebritynudes.com
rarecelebs.net
rare-nude-celeb-movie-scenes.com
rarestars.com
realcelebs.com
redlighthost.com
rogerceleb.com
scancollections.com
scoopy.net
scottss.com
secretceleb.com
sexkey.com
sexyhollywood.com
shocking-celebs.com
sizzlingcelebs.com
sleazycelebs.com
smutserver.com
stark-naked-celebrities.com

starsland.com
steamycelebpics.com
stolencelebritypics.com
strippers.com
supermodelsundressed.com
sweetcelebnudes.com
sweetcelebrities.com
tazziez.com
teen.adultfreespace.com
teen-nude-celebrities.com
tempted.com
thebinaryreview
theworldofcelebnude.com
Tnasupermarket.com
topqualitycelebs.com
trillianfakes.com
truecelebs.com
ultimate-celebs.com
upskirtcelebs.com
virtualcelebs.com
visionnetworks.net
voyeurcelebs.com
wetvideo.com
wildflics.com
xxxcelebpass.com
xxxcelebrityfakes.com
xxxcelebs.com
xxxpassport.com

Daniel J. Cooper

Perfect 10 Magazine

Direct- (310) 205-9817

Toll Free- (800) 606-6639

Fax- (310) 205-9638

Email- dan@perfect10.com

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Subject: Pending Merchant Account**Date:** Mon, 12 May 2003 15:51:27 -0700**From:** "Brummett, Ed" <EBrummett@csi-corp.com>**To:** "Norman Z" <normanz@earthlink.net>

Norman I am in receipt of your additional information and have completed my initial review. In order to continue the underwriting process I will need a user name and pw to review the membership area of your web site. In addition Cardservice International will only accept the following billing terms:

Trial membership

Monthly membership

Cardservice International will not accept magazine subscriptions as a service.

Can you please indicate if the billing terms and service exemption are acceptable to you. If yes, please confirm the acceptance of terms and exclusion of service in writing and make the necessary changes to the web site and provide user name and pw. If no, then we cannot accept the account.

Ed Brummett

Risk Analysis Manager

Direct Line 805 552 2640

Fax 805 552 8486

Subject: ATT: LORI IN RISK MANAGEMENT

Date: Thu, 19 Jun 2003 15:25:37 -0800

From: "Dan Cooper" <Dan@perfect10.com>

To: <mbcsales@humboldtbank.com>

CC: "Norman Z" <normanz@earthlink.net>

Dear Lori:

I wanted to forward this email to you that I sent yesterday to Visa, Mastercard and one of its Member Banks, First Data. According to a report I recently came across on abcnews.com, Humboldt Bank is involved in processing credit card payments for online pornography. After you have read the email below, please notify me as to how your bank intends to abide by these new regulations. Should you require any more information to understand the severity of the problem, Perfect 10 will be happy to provide it to you.

Thanks.

Daniel Cooper

Perfect 10 Magazine

Daniel J. Cooper

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Fax- (310) 205-9638

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-----Original Message-----

From: Dan Cooper [mailto:Dan@perfect10.com]
Sent: Tuesday, June 17, 2003 11:54 AM
To: 'Elliott, Martin'; 'noah_hanft@mastercard.com'; 'noah-hanft@mastercard.com'; 'adam.herbert@firstdata.com'
Cc: 'Norman Z'
Subject:

Dear Gentlemen:

As you are all aware, over the course of the previous five months Perfect 10, along with others, has notified you on various occasions regarding the involvement of Master Card, Visa, and their constituent Member Banks in the processing of credit cards for webmasters with obviously stolen celebrity content (including Perfect 10 content), phony registrations, and who commit various acts of consumer fraud.

On February 24, 2003, Martin Elliot, Visa's Director of Corporate Risk Management, responded to our notifications by informing us of newly enacted regulations apparently designed to stem the tide of the illegal action we brought to his attention. Specifically, the regulations purportedly enacted are as follows:

- (1) "Members known by Visa to be processing transactions for such websites will be required to confirm to Visa that any celebrity porn site merchant with whom they have a business relationship does not sell material that would cause the Member to violate Visa regulations prohibiting illegal transactions."
- (2) "Members registering new celebrity porn site merchants will be required to provide Visa with documentation to demonstrate that the content sold at such websites will not cause the Member to violate Visa regulations that prohibit illegal transactions."
- (3) "Members that have registered merchants whom Visa believes pose higher chargeback and financial risks (which include many adult-content websites) are required to validate the ownership of the sites."

Despite the enactment of these regulations, which Perfect 10 wholeheartedly welcomed, it appears that they have been roundly ignored, as the Member Banks have seemingly done very little in response to our repeated communications. For example, the following is a list of websites about which we notified Mr. Elliott in our letter of January 8, 2003 that are still operating and accepting Visa and Mastercard as forms of payment:

- Celebmovie.com which offers "Susan George Raped" along with "Alyson Hanigan Lesbo" on its homepage

- Truecelebs.com
- Celebfan.com, nakedcelebritypics.com (“masterbating Gillian Anderson”)
- Celebfakes.com (now nudecelebnews.com)
- Call-girls.net “The unauthorized celebrity site”
- Celebrityorgy.com “uncensored celebrity fucking”
- Celebrity-xxx.com (“Drew Barrymore drunk nude pics”)
- Celeblover.com, allnudecelebritiesxxx.com, 007celebsnude.com, and realcelebs.com.

These sites all go to the same stolen content, which includes images belonging to Perfect 10. They advertise such things as “Our Exclusive Gallery on Anna Kournikova! Clear shots of Anna’s pussy!” In fact, beyond just these few examples, it seems that virtually all of the 247 sites with obvious celebrity infringements identified in my January 8, 2003 letter continue to operate and accept Visa or Mastercard as a form of payment.

Moreover, despite the “enactment” of regulation three (3) above, as we have indicated before, many of the webmasters for these websites continue to maintain obviously phony “who is” registrations, such as celeblover.com (“BELIZE CITY, BZ BZ BZ,” with a phone number of 000-000-0000); celebfan.com and nakedcelebritypics.com (formerly “The Valley, AI,” with a phone number of 123-456-7890, now with no registration information at all); and celebrity-xxx.com (formerly “Port Vila VU NA VU,” now “Groningen, NL”).

The persistence of this illegal activity unfortunately compels the conclusion that the regulations announced in Mr. Elliott’s letter of February 24, 2003 are not being enforced in any meaningful way. With the notice we have provided to you, there is simply no excuse for your continued financial support of this mass theft of intellectual property and other illegal acts.

On behalf of Perfect 10 and other copyright holders, please let us know what, if anything, you intend to do about this matter.

Sincerely,

Daniel J. Cooper

General Counsel

Perfect 10, Inc.

Daniel J. Cooper

Perfect 10 Magazine

Direct- (310) 205-9817

Toll Free- (800) 606-6639

Fax- (310) 205-9638

Email- dan@perfect10.com

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Subject: processing for stolen celebrity pornography**Date:** Tue, 24 Jun 2003 17:10:24 -0800**From:** "Dan Cooper" <Dan@perfect10.com>**To:** <pkilkenn@banknbr.com>, <adam.herbert@firstdata.com>, <dennisdilazzero@minotola.com>, <pberg@heartland-bank.com>

Dear Ladies and Gentlemen:

My name is Daniel J. Cooper, and I am the General Counsel of Perfect 10, Inc., publisher of Perfect 10 Magazine and perfect10.com. I am writing to all of you with regard to your respective bank's role in the possible processing of credit card transactions for online celebrity pornography. Over the course of the previous five months Perfect 10, along with others, has notified Master Card and Visa regarding the processing of credit cards for webmasters with obviously stolen celebrity content (including Perfect 10 content), phony registrations, and who commit various acts of consumer fraud. In connection with these various communications, Perfect 10 prepared and transmitted a spreadsheet of some 250 websites that currently or in the very recent past have offered stolen celebrity content. While we are unsure which of these websites (if any) your banks provide processing services for, this spreadsheet is nonetheless attached for your review. Please note that there are several letter "keys" that we have used in the spreadsheet to denote certain things: for example, a "P" indicates that we tried calling the registrant's listed phone number, which was non-functional; a "F" indicates a registrant from a country outside of the United States, which is where many of these websites are registered; finally, a "*" next to an "F" indicates registration information that we believe to be phony.

On February 24, 2003, Martin Elliot, Visa's Director of Corporate Risk Management, responded to our various notifications by informing us of newly enacted regulations apparently designed to stem the tide of the illegal action we brought to his attention. Specifically, the regulations purportedly enacted are as follows:

- (1) "Members known by Visa to be processing transactions for such websites will be required to confirm to Visa that any celebrity porn site merchant with whom they have a business relationship does not sell material that would cause the Member to violate Visa regulations prohibiting illegal transactions."
- (2) "Members registering new celebrity porn site merchants will be required to provide Visa with documentation to demonstrate that the content sold at such websites will not cause the Member to violate Visa regulations that prohibit illegal transactions."
- (3) "Members that have registered merchants whom Visa believes pose higher chargeback and financial risks (which include many adult-content websites) are required to validate the ownership of the sites."

Despite the enactment of these regulations, which Perfect 10 wholeheartedly welcomed, it appears that they

have had very little effect. For example, the following is a list of websites about which we notified Mr. Elliott in our letter of January 8, 2003 that are still operating and accepting Visa and Mastercard as forms of payment:

- Celebmovie.com which offers "Susan George Raped" along with "Alyson Hanigan Lesbo" on its homepage
- Truecelebs.com
- Celebfan.com, nakedcelebritypics.com ("masterbating Gillian Anderson")
- Celebfakes.com (now nudecelebnews.com)
- Call-girls.net "The unauthorized celebrity site"
- Celebrityorgy.com "uncensored celebrity fucking"
- Celebrity-xxx.com ("Drew Barrymore drunk nude pics")
- Celeblover.com, allnudecelebritiesxxx.com, 007celebsnude.com, and realcelebs.com.

The last four of these sites all go to the same stolen content, which includes images belonging to Perfect 10. They advertise such things as "Our Exclusive Gallery on Anna Kournikova! Clear shots of Anna's pussy!" In fact, beyond just these few examples, it seems that virtually all of the approximately 250 sites with obvious celebrity infringements identified in our January 8, 2003 letter continue to operate and accept Visa or Mastercard as a form of payment.

Moreover, despite the "enactment" of regulation three (3) above, as we have indicated before, many of the webmasters for these websites continue to maintain obviously phony "who is" registrations, such as celeblover.com ("BELIZE CITY, BZ BZ BZ," with a phone number of 000-000-0000); celebfan.com and nakedcelebritypics.com (formerly "The Valley, AL," with a phone number of 123-456-7890, now with no registration information at all); and celebrity-xxx.com (formerly "Port Vila VU NA VU," now "Groningen, NL").

The persistence of this illegal activity unfortunately compels the conclusion that the regulations announced in Mr. Elliott's letter of February 24, 2003 are not being treated seriously by Member Banks. While we are uncertain whether your banks process transactions for any of the particular websites that are identified in our spreadsheet, we would like to know what steps, if any, your institutions have taken to comply the new Visa regulations quoted above. We are confident that a meaningful enforcement of these regulations will result in a serious crackdown on the theft and other fraudulent activity that is virtually synonymous with so-called "celebrity porn."

Accordingly, on behalf of Perfect 10 and other copyright holders, please let us know what your intentions are regarding this problem.

Sincerely,

Daniel J. Cooper

Daniel J. Cooper

Perfect 10 Magazine


Direct- (310) 205-9817

Toll Free- (800) 606-6639

Fax- (310) 205-9638

Email- dan@perfect10.com

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 phonyregformast618 (revised).xls	Name: phonyregformast618 (revised).xls Type: Microsoft Excel Worksheet (application/vnd.ms-excel) Encoding: base64
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Dan Cooper

From: Dan Cooper [Dan@perfect10.com]
Sent: Wednesday, November 19, 2003 2:51 PM
To: 'adam.herbert@firstdata.com'; 'Elliott, Martin'; 'snair@csi-corp.com'; 'pallen@visa.com'; 'pkilkenn@banknbr.com'; 'dennisdilazzero@minotola.com'; 'pberg@heartland-bank.com'; 'noah_hanft@mastercard.com'

Subject: Processing for Infringing Websites

Dear Sirs,

Although, beginning in January of 2003, Perfect 10 contacted you a number of times regarding the excessive number of adult websites consisting of predominantly stolen materials for which your institutions may be processing transactions or otherwise involved, little appears to have changed since that time. Attached is a spreadsheet of just some of the websites that we believe your institutions continue to support, and which Perfect 10 believes are selling stolen content to the public. While the number of sites on this list has diminished somewhat over the course of 2003, the biggest players with obviously stolen celebrity images and movie clips continue to enjoy your support, even despite the enactment of Visa regulations purportedly designed to combat this very problem. In addition, new sites with obviously stolen content have been approved. A few such examples are bolded in the attached spreadsheet.

Allow us to remind you that Perfect 10 pays for its content and cannot compete against entities which steal hundreds of millions of dollars of others' property. It also appears that the websites that you may be processing for are stealing more and more property belonging to the movie studios, including large numbers of stolen movie clips. Examples of sites with stolen movie clips that your companies process for include nitrovideo.com, celebmovie.com, celebflix.com, nudecelebritytheatre.com, movieman.com, wild-will.com, jadesmovies.com, admarchive.com, celebrity-xxx.com, nudecelebnews.com, realcelebs.com, call-girls.net, Babylon-x.com, and kinky-celebz.com, to name just a few.

In the course of our investigation, we have amassed roughly 31,000 printed pages and about 80 CD's of infringing content collected from websites for which your institutions may be processing transactions. If you would like to have us send this material to you, please let me know.

Sincerely,

Daniel J. Cooper

General Counsel
Perfect 10, Inc.

Daniel J. Cooper
Perfect 10 Magazine
Direct- (310) 205-9817
Toll Free- (800) 606-6639

11/19/2003

Fax- (310) 205-9638
Email- dan@perfect10.com

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11/19/2003

celebrity-nude-pictures.com	London, GB 56985	546-87654398	F	sexkey/ccbill
celebrityonly.com	Hauts De Seine 92000 FR	619565553	F	ccbill
celebritypass.com	Carson City, NV	775-884-0180	F*	pswbilling
celebrity-review.com	Chico, CA 95928	503-490-7487		lbill
celebrityskank.com	NoordHolland 1021 JV NL	31 202 1211	F*	paycom
celebritysleaze	Toronto M6J 3P4	647-886-6021		paycom
celebritysun.com	sun valley, NV	775-673-9151		ccbill/sexkey
celebrityvisions.com	Costa Mesa, CA 92626	949 981 2634		paypal
celebrity-xxx	Port Vila, VU NA VU	310-901-6136	F*	webcombilling
celebscaughnude.com	zgorne gorje, SI	38640513082	F*	ccbill/sexkey
celebs-club	Hanover, 30455 N/A United States	49-511-4752105	F*	OPM direct
celeb-search.com	toronto, ontario, CA	416-561-4977	F	paycom
celebsxposed.com	email, ee ete NT	123-123-1234	F*	CCBill
celebs-n-vintage.com	Manhasset, NY 11030	516-8408804	F	paycom
celebsontheweb.com	BC v1e 1c5	602-992-3356		saf shop
celebsxposed.com	Phoenix, AZ 85032-9380	123-123-1234	F*	ccbill/sexkey
celebs.com	Pepper Pike, OH 44124	216-951-2114, 12 P	P	ccbill
celebiaboo.com	Panama	416-820-5373	F*	paycom
celebticket.com	Hoek Hugenholtzweg, Curacao AN	5999-433-8810	F*	paycom/ccbill
celeb-xxx.com	Curacao	5999-433-8810	F*	paycom/ccbill
cinema-stars.com	porterdale GA 10018	9999999999	F*	ccbill
cool-celebs.com	pennsauken, NJ	856-662-9100		sexkey/ccbill
crazyacafakes.com	P. O. Box 821 The Valley AI	908-788-2003	F*	2000 charge
draugen.com	Three Bridges, NJ 08887	61125432	F	membershipplus
dreamstarlets.com	odnes, NORWAY	702-227-9739		Ccbill
evilscorts.com	Las Vegas NV 89118	416-534-5000	F	paypal
fakecelebs.com	Toronto, ON M5A 4P7	352485328	F*	Web Transaction Srevicees
fakir.net	P. O. Box 821 The Valley AI	416-534-5000	F*	opm direct
famacelebrities.com	Geelong VI 3220 AU	863-471-6036	F	verotel/2000 charge
famaestars.com	Toronto, ON M5A 4P7	602-953-6006	F	paycom
files.com	Munich Germany 8000 DE 12345	602-953-6006	F	P S W billing
find38.net	Sebring, FI 33871	602-953-6006	P	netverifier
findcelebnudity.com	Phoenix, AZ 85078-5934	914-699-5461	F*	Ccbill
findhollywood.com	Phoenix, AZ 85078-5934	038 345986		ccbill
findhollywood.com	Mount Vernon, NY 10552	9054609568		probilling
findhollywoodextreme.com	Zwolle NH 1001 XU NL	813 347 8437	P	paycom
findhollywood.com	Tortola, Tortola 00000 VG	31 529454466	F*	lbill
findhollywood.com	Tampa, FI 33602	805-689-6044		CCBill
findhollywood.com	Ormen OV 7731 GA	810-759-2275	P	paycom
findhollywood.com	Carpinteria, CA 93014-5003			ccbill
findhollywood.com	Warren, MI 48091			ccbill

internetmovies.com	Kahului, HI 96732	808 283 2885		paycom
jadesmovies.com	Toronto, On m6r 2g5 CA	416 561 4977	F	paycom
kiriki-celebz.com	Panama	416-820-5373	F*	blyther
lajofluxlucre.com	Carson City, NV	775-884-0180	F*	celebrity pass
lannofantasy.com	Toronto ON M5A 4P7	416-534-5000	F	Web Transaction Srevicees
loveanddates.com	oakville,ontario, CA	905-844-5000	F	ccblll
magilyns.com	lexington, SC 29073	803-755-7299	P	ccblll
magdelcelebs.com	Panama	416-820-5373	F*	paycom
magdelcelebs.com	Kingslowm, Sll George VC	555-5555	F*	paycom
magdelcelebs.com	Oak Park, IL 60302	708-358-2640	F*	Ccblll - 2000 charge
magdelcelebs.com	NE 12345 US		F*	paycom/lbill
magdelcelebs.com	P O. Box 821 The Valley AI	123-456-7890	F*	probillng
musicmoviesbooks.com	Berkshire, Berkshire SL2 1NE	01753 675228	F	goes to 2.tinyscrets.com/lbill
nakedcelebritypics.com	Kingstown, St George VC	555-5555	F*	ccblll/sexkey
nakedcelebritypics.com	edmond, OK	661-752-7935	F*	paycom
nakedcelebritypics.com	Tortola, Tortola TORT VG		F*	sexkey/ccblll
nakedcelebritypics.com	BC v6v 2m2 CA		F*	up
nawceleb.com	Eagleville, PA 19408	610-539-0551	F*	ccblll
nitrovideo.com	Amsterdam, NH 1062 DR	209845621	F*	ccblll
nude-britney-spears-pics.com	Amsterdam, NH 1062 DR NL		F*	probillng
nude-britney-spears-pics.com	Grand Turk TC	999-999-9999	F*	probillng
nudeceleboutpost.com	Metairie, LA 70005	504-838-8787	P	Ccblll
nudecelebrite.com	Phoenix, AZ 85032-9380	602-992-3356		CCBlll
nudecelebritytheater.com	Paris 70513 FR		F	sexkey/ccblll
nudecelebs.org	Hoek Hugenholtzweg, Curacao AN	no phone number	F	sexkey/ccblll
nudecelebsrevue.com	P. O. Box 821 The Valley AI	5999-433-8810	F*	paycom/ccblll
nudefakcelebs.com	Tustin, CA 92780	no phone number	F*	OPM direct
nudehollywood.com	Knoxville, TN 37919	714-669-9638		Ccblll
nudehollywood.com	odres, NORWAY	407-540-9360	F	sexkey/ccblll
nude-naked-celebrites.com	odres, NORWAY	61125432	F	sexkey/ccblll
nude-scenes.com	Gibraltar, GI	350 44343	F*	paycom
nude-supermodels.com	Richmond, BC V7C 2E5 CA	604-244-7625	F	Adult Key
nudatrek.com	Brisbane, QLD 4006 AU	6139921248		lblll
nudatrazzifilth.com	Noordholland 1504 DA NL	31-6-28270691	F	ccblll
nyones.com	Lakeland, FL 33815	8636882900	F*	ccblll
nyound.com	Port Vila, VU 00000 VU	44 7790896346	F*	webcombillng
nyopstars.com	San Diego, CA 92117	858 273 0885		paycom
nyrimcelebrity.com	fort wayne, In 46819	219-432-6333		paypal
nyrecelebs.net	Belize City, BZ BZ BZ	000-000-0000	F*	paycom
nyrealcelebs.com	Slough, UK		F	sexkey/ccblll
nyredlemonfakes.com	corinth, MS	662-665-4882		sexkey/ccblll
nyredlightstost.com	curacao, AN	5999-433-8810	F*	paycom/ccblll
nyrogerceleb.com				

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secretceleb.com	Hoek Hugenholtzweg, Curacao AN		F*	membershipplus
sexkey.com				ccbill
sexkey.com	zandvoort 2042 az	(+) 23 573-4935		sexkey/ccbill
sexkey.com	Vancouver, BC V6E 3Z3	604-602-1766	F	paycom
sexkey.com	Phoenix, Az 85078-5934	602-953-6006		Ccbill
sexkey.com	Utrecht, Utrecht 7515 VP NL	308744521		probill
sexkey.com	general post office, Hong Kong	85291028527	F*	lbill
sexkey.com	Toronto, ON M5A 4P7	416-534-5000		Web Transaction Services
sexkey.com	Zwoile, NH 1001 XU NL	31-383-45986	F*	probill
sexkey.com	Curacao, AN	5999-433-8810	F*	paycom/ccbill
sexkey.com	Toronto ON M5A 4P7	416-534-5000	F	Web Transaction Services
sexkey.com	Het Blaazen, Switserbant		F	sexkey/ccbill

Dan Cooper

From: Dan Cooper [Dan@perfect10.com]
Sent: Monday, December 08, 2003 9:45 AM
To: 'Elliott, Martin'
Cc: 'dan@perfect10.com'
Subject: follow up

Dear Mr. Elliott—I previously tried sending you this email last week, but it was returned unsuccessful. I am now trying to forward it without the referenced exhibits attached to see if this works. I can send those exhibits to you by fax if you wish.

Dear Sirs,

As a follow-up to my earlier communications with you, I would like to bring to your attention another fraudulent webmaster for whom your companies are providing critical support.

On November 30, 2003, we sent a webmaster promoting Paris Hilton videos (Powerzest It Limited, 37B Cavendish Street, London, W1G W1G 8JR, UK, the webmaster for extremexxxfootage.com), an email asking him to stop spamming us (Exhibit 1). On December 4, we received another unsolicited email. This email, advertising the Paris Hilton sex video, stated that the video would be free (page 1 of Exhibit 2), and later, that “your trial is free and good for 45 minutes.”

As part of our ongoing investigations into unauthorized adult content, and based on the representation regarding the free trial period, Perfect 10 subscribed to the site using a Mastercard on a trial basis but saw nothing but a blank screen. Since the promised content was not delivered, Perfect 10 sent an email asking to have the “free” membership cancelled without charge (Exhibit 3). This email was sent well within the purportedly free 45 minute time period.

This timely request for cancellation notwithstanding, a couple of hours later, we received an email from the webmaster thanking us for our subscription (Exhibit 4). To add insult to injury, a later email from the site indicated that should we attempt to charge back the charge, the website would instruct the bank to cancel his credit card, send the account to a collection agency, and commence criminal proceedings for credit card fraud (Exhibit 5).

This is yet another example of the type of webmaster with whom your companies should not be working.

Sincerely,

Daniel J. Cooper

General Counsel
PERFECT 10 MAGAZINE

Daniel J. Cooper
Perfect 10 Magazine
Direct- (310) 205-9817

12/8/2003

Toll Free- (800) 606-6639
Fax- (310) 205-9638
Email- dan@perfect10.com

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12/8/2003