



## **JURISDICTION AND VENUE**

2. The Court has subject matter jurisdiction of this action under 15 U.S.C. §§ 1114(1), 1114(2)(D)(v) and 1121, and 28 U.S.C. §§ 1331, 1337 and 1338.

3. The Court has personal jurisdiction over defendant Charles Carreon because he is a member of the California bar, because Carreon is currently litigating a related case in this Court, and because Carreon has told plaintiff that California is an appropriate jurisdiction for litigating Carreon's claims about the web site and its domain name. Moreover, the web site that Carreon claims is unlawful is hosted in this district.

4. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b)(2), because a substantial part of the events giving rise to the claim occurred in this district.

## **PARTIES**

5. Plaintiff Doe is a citizen of California who has established an anonymous parody web site criticizing Charles Carreon for his use of spurious demand letters and litigation to suppress free speech on the Internet. Doe seeks leave to proceed anonymously to protect her First Amendment right to speak anonymously. Doe is identified using female pronouns generically, without implying Doe's actual gender.

6. Defendant Charles Carreon is a lawyer who lives in Arizona but also belongs to the California bar.

## **FACTS**

### **A. Background Facts**

7. This case arises out of a controversy between the operators of two web sites — "The Oatmeal," <http://theoatmeal.com/>, a site where cartoonist Matt Inman posts his work, and "funnyjunk," <http://funnyjunk.com/>, a site where various humorous materials appearing elsewhere on the Internet are posted by funnyjunk's own users. In a blog post in mid-June 2011, Inman complained vociferously that too much of his own copyrighted work was being hosted on funnyjunk, without his permission and to funnyjunk's financial benefit.

8. On June 2, 2012, Charles Carreon, acting as counsel for funnyjunk, sent a letter to Inman asserting that Inman's June 2011 blog post was defamatory, claiming that Inman had committed various other torts, and demanding payment of \$20,000 in damages.

9. Carreon's letter received widespread attention, much of it very negative, in the online media.

1           10. Seeking to poke fun at Carreon's \$20,000 demand, Inman announced a fundraising campaign  
2 to raise \$20,000 for charity. The campaign has also drawn widespread attention, much of which further  
3 expressed derision about Carreon.

4           11. Acting pro se, Carreon filed suit in this Court against Inman, IndieGogo (the online fundraising  
5 platform through which Inman conducted his charity campaign), and two charities, alleging a variety of torts.  
6 Case No. 3:12-cv-03112-EMC. The lawsuit also alleged that an anonymous Twitter user had defamed  
7 Carreon and violated his trademark by setting up a parody account in Carreon's name, and that other  
8 anonymous Internet users had violated Carreon's rights in other ways. That lawsuit has provoked further  
9 online denunciations of Carreon.

10           **B. Doe's Web Site About Carreon**

11           12. Seeking to express disagreement with Carreon's attacks on the free speech rights of his critics,  
12 plaintiff Doe registered the domain name www.charles-carreon.com, and began blogging at that domain  
13 name about Carreon. Each blog post was written in Carreon's name, using exaggerated language that  
14 parodied what plaintiff considered to be the excessive language and tone in Carreon's demand letters and  
15 other communications. A copy of the web site's home page, as it appeared on June 25, 2012, is attached as  
16 Exhibit A.

17           13. The web site was carefully designed to make clear its parodic nature. The phrase "censorious  
18 douchebag" appears both in the title tag on each page of the web site, which appears in the title bar of an  
19 Internet user's web browser, and as a banner heading at the top of each page of the web site. The subtitle  
20 of the web site is "The satirical diary about Charles Carreon."

21           14. The "about" page on the web site begins with the following paragraph: "I am not the real Charles  
22 Carreon. Charles Carreon is a character I play on this blog. Think of it as a giant internet soap opera. If you  
23 don't get the joke, I'm sorry." The web site provides the email address "satiricalcharles@gmail.com" for  
24 users who want to contact plaintiff. A copy of the "about" page is attached as Exhibit B.

25           15. The web site originally featured a portion of a photograph of Carreon. However, after Carreon  
26 claimed that he owned the copyright in that photograph, plaintiff replaced the photograph with a graphic of  
27 a dinosaur and the legend: "This image has been censored. Keep calm, don't Carreon." A copy of the home  
28 page as it appeared on June 28, 2012 (that is, with a new graphic) is attached as Exhibit C.

1 16. The domain name charles-carreon.com was registered with the domain name registrar  
2 Register.com, which allows a registrant's name to be concealed in the official "WHOIS" records. Plaintiff  
3 registered that way because she desired to keep her identity secret.

4 17. Doe's web site is non-commercial, existing for the sole purpose of expressing Doe's views about  
5 Charles Carreon.

6 18. Doe does not use the charles-carreon domain name in connection with the sale or advertising  
7 of any goods or services.

8 19. At no time did Doe offer the domain name charles-carreon.com for sale, or even hint that she  
9 had any interest in selling the domain name. Doe is not in the business of selling domain names.

10 20. Doe has not registered any other domain name that contains the trademark of any other person.

11 21. Doe's web site is an obvious parody of Charles Carreon. No person visiting the web site could  
12 believe Charles Carreon himself owns or endorses the web site.

13 22. Plaintiff has no intent to profit from any Internet traffic intended for Charles Carreon's web site,  
14 or for her own web site. Nothing is for sale on plaintiff's web site and no donations are solicited on  
15 plaintiff's web site. Plaintiff's web site does not include paid advertisements.

16 23. Doe makes fair use of the trademark Charles Carreon for the purpose of denominating the  
17 subject of the web site and the target of her criticism.

18 **C. Carreon's Claims of Trademark Infringement and Threats of Litigation**

19 24. On June 21, 2012, Carreon sent a demand letter to Register.com, the registrar of the domain  
20 name charles-carreon.com, asserting that, by registering the domain name charles-carreon.com and writing  
21 blog posts in his name, plaintiff had infringed the trademark in Carreon's name, and had engaged in  
22 cybersquatting. Carreon threatened to amend his complaint against Inman, No. 3:12-cv-03112-EMC, to  
23 allege such claims against plaintiff, and warned Register.com that he would sue that company unless it  
24 revealed plaintiff's identity. A copy of this letter is attached as Exhibit D.

25 25. On June 22, 2012, counsel for plaintiff sent an email to Carreon, with a copy to Register.com,  
26 explaining why Carreon's threatened claims were directly contrary to Ninth Circuit precedent and urging  
27 Carreon not to sue plaintiff. A copy of this email is attached as Exhibit E.

28 26. On June 23, 2012, Carreon responded with an email warning that Carreon might sue Doe at any

1 time in the next three years, waiting for a time when, he suggested, plaintiff's pro bono counsel might not  
2 be available. He also warned that he would employ private counsel instead of suing pro se so that he could  
3 seek an award of attorney fees, and that he would seek in excess of \$100,000 in damages, which, he asserted,  
4 might not be dischargeable in bankruptcy. Carreon also stated, "I have the known capacity to litigate appeals  
5 for years," and warned that plaintiff could not be certain whether her pro bono counsel would continue its  
6 representation throughout "such an extended course of litigation." A copy of this email is attached as  
7 Exhibit F. Carreon's letter represented an attempt to intimidate Plaintiff into surrendering her First  
8 Amendment rights based on a threat of unpredictable, protracted, expensive, and burdensome litigation  
9 based on meritless claims.

10 27. At some time on or around June 26, 2012, Register.com disclosed plaintiff's name and  
11 identifying information in the domain name's WHOIS record. After Doe's counsel warned Register.com  
12 that disclosure of Doe's identity could provide a basis for a suit for breach of contract, Register.com restored  
13 Doe's private registration.

#### 14 **CAUSES OF ACTION FOR DECLARATORY RELIEF**

15 28. Plaintiff maintains that her current and prior uses of Charles Carreon's name in her domain name  
16 and in the text of her web site were at all times legal. Defendant asserts that plaintiff's actions were illegal.

17 29. Defendant's actions have given rise to an actual and justiciable controversy pursuant to 28  
18 U.S.C. § 2201 et seq.

19 30. Plaintiff therefore seeks a declaratory judgment that she has not infringed any trademark nor  
20 falsely designated any origin, that she is not in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114,  
21 and that she is not in violation of Section 43 of the Lanham Act, subsections (a) or (d), 15 U.S.C. §§ 1125(a)  
22 or (d).

23 31. Plaintiff also seeks a declaratory judgment that she is not infringing under the law of any relevant  
24 state, and that she has not engaged and is not engaging in unfair competition or otherwise in violation of any  
25 common-law trademark rights or any other causes of action that defendant may allege through  
26 counterclaims.

27 32. Plaintiff further seeks a declaratory judgment that any claims that defendant might have had  
28 under federal or state trademark laws are barred by the First Amendment and by principles of fair use,

1 including nominative use and parody.

2 WHEREFORE, plaintiff prays the court to enter a judgment in favor of plaintiff Doe, and against defendant  
3 Charles Carreon as follows:

4 A. Declaring that plaintiff's domain name "charles-carreon.com," plaintiff's use of the domain  
5 name, and plaintiff's use of her web site do not violate defendant's rights under the Lanham Act or other  
6 trademark law;

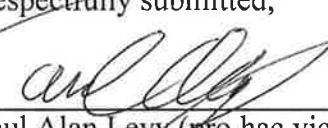
7 B. Declaring that plaintiff's use of the domain name "charles-carreon.com" is fair use and protected  
8 under the First Amendment, and does not infringe on defendant's mark;

9 C. Declaring that defendant is not entitled to an injunction against plaintiff using the domain name  
10 "charles-carreon.com" or operating the web site located at the URL "www.charles-carreon.com";

11 D. Awarding plaintiff her costs and reasonable attorney fees in this matter; and

12 E. Awarding such other relief as may be just and proper.

13 Respectfully submitted,

14   
15 Paul Alan Levy (pro hac vice being sought)  
16 Julie Murray

17 Public Citizen Litigation Group  
18 1600 20th Street, NW  
19 Washington, D.C. 20009  
20 (202) 588-1000

21   
22 Catherine R. Gellis, California Bar #251927

23 P.O. Box 2477  
24 Sausalito, California 94966  
25 202-642-2849  
26 cathy@cgcounsel.com

27 Attorneys for Plaintiff Doe

28 June 29, 2012

## —censoriousdouchebag

### The satirical diary about Charles Carreon

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### Bransom owes me dinosaurs.

June 22, 2012

[Brett Kimberlin is Evil](#), [Censorship](#), [Charles Carreon](#), [Douchebaggery](#)

[Leave a Comment](#)

So another day goes by and I sit here sipping my Starbucks. Then I am rudely notified by Tara (who was dressed up as Carl Jung) who came rambling into my inner sanctum of the Carreon cave. What does she have for me? THIS! Serenity of self love shattered. Shattered I say. Some things you accept gracefully, but I am not, and I will never be, a jelly bean accountant. What sort of job is that anyways? Who counts jelly beans all day other then Tara occasionally?

I thought I made it clear before, that I am an [Internet Lawyer](#). I only help the good and good looking, of which I am both, hence I represent myself. I repeat I do not count jelly beans. Even the mention of it is slanderous and exemptible. I now am quite sure that this lady owes me **two** Tyrannosaur Rexes, a Stegosaurus, a Platypus, and her domain name. If she does not surrender said dinosaurs and immediately point her domain at this blog, I will take action in the following ways:

1. File a grievance with the [United Nations](#).
2. Sue the [Children's Hospital of Seattle](#).
3. Rename today Bransom owes me dinosaurs day on my personal calendar.
4. Give [interview to anyone who will listen](#) on how your blog is improperly setup under California Law.
5. Place a [peace order on you so that you may not speak my name](#).

So how funny do you feel now? Thought so.

Charles Carreon Esq.

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### You are not the internet.

June 22, 2012

[Censorship](#), [Charles Carreon](#), [Douchebaggery](#)

[2 Comments](#)

Stop it right now with your [delusions of grandeur](#). You are not the internet. [The internet loves me](#). I am [practically a God](#). I find it disingenuous that people claim [I am a dick](#). People love me, [they make pictures](#) of me for God's (or my) sake. I am idolized. On top of that [people are calling my ethics into question?](#) All I want is to safely put into trust the [funds I donated to](#). To make sure they get to their [rightful owner](#). All I want is [respectful spirited debate](#). However people keep satirizing me like the true [Nazis they are](#). Don't they know I'm 1/64th Jewish possibly, according to Tara?

Stop it now, before I break out the Lenham Act on you all and take all your \$20,000.

Exhibit A

Charles Carreon Esq.

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## A break from character.

June 21, 2012

Freedom

4 Comments

Readers,

I am not posting this satirically as I originally intended. I had half of this post drafted and then realized the subject matter would be done a disservice by making it into another joke. As anyone who reads this blog might know, I value free speech. I also can be a world class troll if I need to. Maybe that is why I am such a proponent of the First Amendment. I believe through free speech we are granted the ability to do real journalism based on fact and truth without fear of retribution or intimidation.

That being said, free speech and journalism fails when our journalist become lazy and start taking shortcuts. Shortcuts like just pasting an interview into an article with no analysis of the facts. Journalism where the author of an article becomes a mouthpiece for the subject of his piece. I have seen many easily researchable errors while covering Charles Carreon. I also see something sinister happening where Matthew Inman (under advice) is no longer fixing these errors in interviews because of the legal action taken against him. Journalist are allowing Mr. Carreon to frame the conversation as he sees fit, and not standing up for the truth.

Dave Thier of Forbes – Quotes Charles Carreon that IndieGoGo is going to take 9% of the Bear Love fundraiser. When called out on actual facts he in the comment section repeats 9% then does not respond to figures actually obtained from IndieGoGo.com

Michael Cavanaugh of the Washington Post – Repeats Carreon's line that the picture Matthew Inman drew was of Carreon's mother, even though it was of the FunnyJunk admin's mother.

These are but a few of many examples of letting one person frame a debate with journalist who could, and should, place emphasis on the truth. **Without a diligent press our freedom will fail.** We cannot as a free people allow shortcuts or lack of analytical thought to take us down a dark path. This is also a reminder to anyone who reads a news article, think critically. Do not assume fact because it is in print. Research it if the subject interests you and be a party to our freedom.

Thank You,

Chris

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## I can't sue myself.

June 21, 2012

Censorship, Charles Carreon, Douchebaggery

Leave a Comment

Over at the popehat.com they claim that I may have broken attorney client privilege. I ask you Ken, how are they going to do anything about it buddy? I am their lawyer and I won't sue myself! Take that smart man. Also since you have used my trademark in your blog many times, I am requesting that you shut down popehat.com and point it's domain to this blog or else I'll file a federal lawsuit against you. I have warned my detractors many times about this and now Tara has followed through on the threat. As promised, you are now the meat in a Condoleezza Rice and Rush Limbaugh sandwich:





I still await all illegal cybervandal posters on this blog to forward me their pictures for dick drawing. Also I remind you:

"I am not a politician," he says sternly when asked about the apparent discrepancy. "I have not deceived anyone. I am not able to stand armies. It is entirely distinct. The grounds for engaging in savage satire of people who are murderers [is a] completely different situation. That's like comparing touch football with warfare."

Charles Carreon Esq.

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## F the EFF

June 21, 2012

[Brett Kimberlin is Evil](#), [Censorship](#), [Charles Carreon](#), [Douchebaggery](#)

[4 Comments](#)

Looks like no one ever learns. In their little press release the [EFF uses my name twice](#). I have a trademark on my name, and therefor I am entitled to damages now 2 fold. What is 2 x infinity? [I don't know. Tara tells me 2 x infinity is the sign of the dinosaur reemergence](#). I am not so sure. However in the interest of negotiating, I will accept a live [TyrannosaurusRex](#) as compensation. I have consulted with my trusted advisor [Brett Kimberlin](#) and we have concluded a 4 step response.

1. Further perjure ourselves to the court to obtain a peace order against Matthew Inman and the EFF.
2. Subpoena all social media in order to send Cease and Desist orders to all critics of this litigation.
3. Try to settle with said critics for defamation in the amount of \$100,000.
4. Any settlements will be used to create a new TV network called Carrion News. It will only display my political leanings and vilify all that oppose myself or Brett.

[Also to those who oppose me in the comments of these \(or any\) posts](#), Tara is already drawing dicks on your avatars.

Charles Carreon Esq.

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## Copyright and Digital Libraries.

June 21, 2012

[Censorship](#), [Charles Carreon](#), [Douchebaggery](#)

[12 Comments](#)

Nothing I do is illegal. If you do it, it might very well be, but I am exempt for two main reasons. First I am the law. Second, Tara is a librarian. So we can either sue your pie hole shut so fast you won't even be able to swallow your pie, or [we can claim we are fair use non-infringers of your copyright](#). Now this topic was brought up in the comments section of my last entry, and I need to clarify. My wife and I can [draw genitalia](#) all over your pictures and post them to our website. We can [call for bankers to be water boarded](#). We can [use other people's money](#) for our own rent. I can disclose [all our emails and letters](#). We can do anything we want, because I can and will try to bend the law to my needs. [I can use a dead man's name to sell my services](#). I am above you. I am your transcendent legal god.

You however have many fewer rights than I. You cannot [use my name](#) to make fun of me. You cannot draw pictures that I [might perceive are my mother](#). You cannot call me a content thief. You cannot chose how to use [your own trademark](#). You cannot ask for civil debate. You cannot use my tactics against me. You cannot publish my legal letters to you.

Anyone who challenges these rules will learn that my pen is mightier than the sword. One last thing, [Tara says your dick is small](#).

Charles Carreon Esq.

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## Wasn't Me

June 20, 2012

[Charles Carreon, Douchebaggery](#)

[2 Comments](#)

An original poem at charles-carreon.com

It wasn't me

They caught me creeping' in the client's trust fund

It wasn't me

[I say it was just Tara my hun](#)

It wasn't me

They promised I'd get paid

It wasn't me

[Without rent money I wasn't getting laid](#)

It wasn't me

Remember, I have plans and plans and plans.

Charles Carreon Esq.

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## I don't care if you're in Canada. I'll find you.

June 20, 2012

[Censorship, Charles Carreon, Douchebaggery](#)

[2 Comments](#)

So some of my detractors are based outside the United States of Corruption. That's fine, I'll still sue you. [Even if I don't have a license to do so](#). So as I have said, you can't run. You can't hide. I am the law, the internet, and the Buddha all wrapped into an Arizona Kid package. I've already [got Twitter to back down](#). I am coming after you. Even if you are in [Sweden](#). I really don't see why people can't just let me have the funds for Matthew Inman's charity. [I can be trusted with funds that don't belong to me](#), I'm a lawyer. This is all very dehumanizing. I feel like the Japanese when [Disney dropped a nuclear bomb on them](#).

Your Trustworthy Friend,

Charles Carreon Esq.

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## Class Action Suit.

June 20, 2012

[Douchebaggery](#), [Censorship](#), [Charles Carreon](#)

[5 Comments](#)

Dear Readers,

I am looking for persons to be party to a class action lawsuit against [Matthew Inman](#), [IndieGoGo](#), the [National Wildlife Fund](#) and [anyone with Cancer](#). Once party to the suit you will reap many financial benefits, including a share of at least \$200,000. Other benefits are a poem written in your honor by my wife Tara, here is a sample of her work:

Well he used to be a pterodactyl up in the sky,  
Tearin' people's heads off,  
and eatin' their eyes,  
But now he's done a change-up,  
Got a new disguise –  
All Points Bulletin: Look out for this guy!

Also if you like cartoons or photoshop she can do [that too](#). So you ask, "What do I need to do Charles?" Well it's really quite simple. [Donate](#) using the link below (Click the picture) and then we can say that Mr. Inman is misappropriating your donation. No it doesn't matter that the donations haven't ended and he hasn't done it yet. We all know he's going to buy himself medical grade cadavers with his proceeds to make brain smoothies.



Again. Click the link (now above) in the picture. Donate. Then add your name to my class action lawsuit! 3 simple steps to pillaging a [\\$200,000 slush fund](#).

Soon to be your representative,

Charles Carreon Esq.

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## [I will subpoena the internet now.](#)

June 20, 2012

[Censorship](#), [Charles Carreon](#), [Douchebaggery](#)

[2 Comments](#)

So it looks like there are plenty of people who think they can use my name Charles Carreon(TM) and pretend to be me. Like this guy [@charles\\_carron](#) or this [blog here](#). I want all you impostors to know, you will rue the day. As soon as I have pictures of your real faces, Tara is going to photoshop dicks all over them and put them in pornographic scenes with Rush Limbaugh and [Condolezza Rice](#). **Imagine being the meat in that sandwich funny boys.**

Today I sent subpoenas to both Twitter and ArsTechnica. I will find you, I will sue you for at least \$20,000,000 and I will win no matter what. I have [never lost a case](#) and I am going to get their names and make them pay me money. I am then going to take the pictures that Tara photoshops and use their own money to buy billboards next to their homes and offices of their faces with penises all over them. I repeat, I will take your money and spend it on giant pictures of dicks all over your faces. Just delete your fake blogs and accounts now. [I do not lose.](#)

Okay Tara is wearing her Chewbacca outfit, I have to go and get the vaseline.

-Charles Carreon Esq.

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42

## —censoriousdouchebag

### The satirical diary about Charles Carreon

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**This image has been censored.**  
**Keep calm, don't Carreon.**

### About

#### [9 Comments](#)

I am not the real Charles Carreon. Charles Carreon is a character I play on this blog. Think of it as a giant internet soap opera. If you don't get the joke, I'm sorry.

A few clarifications:

1. I do not believe parody and satire should die in the face of legal challenges. The First Amendment is too important for us not to challenge those who would wipe it clean.
2. I do not place ads on this domain or request to do commerce on it. I have had multiple offers to monetize this blog within the first 3 days of its existence. I have and will reject them all.
3. I think using someone else's name to promote your goods or services is amoral.
4. I want you to be mean to my character, don't hold back.
5. If I offend you, remember it's all a joke, only by participating can you become part of the joke.

If you **must** contact me: [satiricalcharles@gmail.com](mailto:satiricalcharles@gmail.com)

Update 2012.06.25

Also apparently, which I say because I never intended it to go there, my character Charles Carreon Esq. has an obsession with dinosaurs. Just go with it.

Update 2012.06.27

By far my favorite search phrase that has brought people to this site is:

“why is charles carreon such a prick?”

Who ever found this site searching that, pat yourself on the back.

Share this:

1

Facebook

Twitter

Email

Like this:

Like Be the first to like this.

Search

### Recent Posts

- [I am big in Asia.](#)
- [I don't see any f'ing dinosaurs people.](#)
- [Oh yes she did.](#)

## Exhibit B

- I find myself at a loss for words.
- [Snakes in the grass.](#)

## Archives

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## Blogroll

- [Blogger Defense Team](#)
- [Electronic Frontier Foundation](#)
- [Make Me A Day](#)
- [Popehat](#)
- [Public Citizen](#)



9 comments

1. [nibor](#) said: June 23, 2012 11:48 am



I don't know if the changed picture is genuine removed due to censoring but the previous one was much more fitting, is it a idea to Photoshop the original so you don't see the face of cc but a backside of a head???

[Reply ↓](#)

2. [censoriousdouchebag](#) said: June 23, 2012 1:44 pm



What I need is someone to provide me with original art of Charles Carreon, a drawn picture of the sorts that they own the exclusive rights to and can license it to me.

[Reply ↓](#)

- o [nibor](#) said: June 23, 2012 2:06 pm



A far as I know "Original art " and "of Charles Carreon" aren't two things one could use in one sentence for aren't they a oxymoron ???

[Reply ↓](#)

- [censoriousdouchebag](#) said: June 23, 2012 2:17 pm



Touché. Then dinosaurs it is. Anyway, I thought it appropriate since my character keeps requesting dinosaurs.

Reply ↓

- Santosh A Halper said: June 23, 2012 1:46 pm



<http://susanhuntart.com/category/family-portraits/>

Reply ↓

- censoriousdouchebag said: June 24, 2012 4:00 pm



Won't work, I won't be able to get license to it.

Reply ↓

3. Anqelicness said: June 27, 2012 5:31 am



Do you need a copy of this art physically or will a scan work? Let the wifey know or e-mail me, oh kind sir.

Reply ↓

- censoriousdouchebag said: June 27, 2012 5:33 am



Scan would work as long as you own the copyright and agree to allow me to use it ☺

Reply ↓

4. Anqelicness said: June 27, 2012 5:41 am



Bwuahaha.. give me a few hours. I'll get fancy with the watercolor.

Reply ↓

## Leave a Reply

Enter your comment here...

Blog at WordPress.com. Theme: Blogum by WPShower.

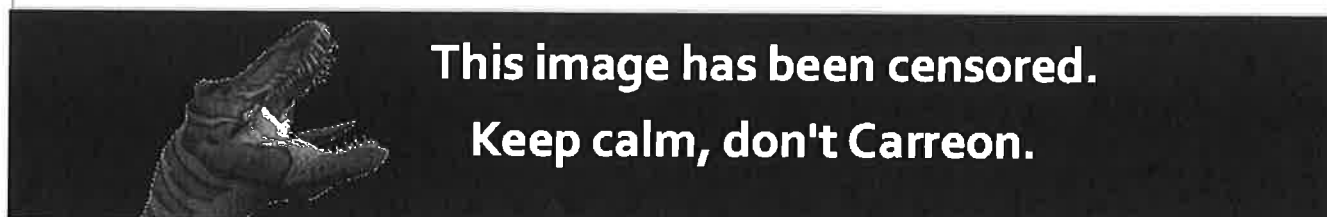
»

## —censoriousdouchebag

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### Carreon Luggage.

June 28, 2012

[Censorship](#), [Charles Carreon](#), [Douchebaggery](#)

[7 Comments](#)

Well since I've been inundated with publicity and the likes I thought it was time to capitalize on it and create my very first consumer products line! Today I humbly submit to you my new brand of travel accessories called Carreon Luggage. See I've been married to a... special person for many years, so I know all about the hassles of dragging dead weight around. I also am known for filing litigation for just about any reason any where, so my slogan is going to be "We get your shit where it's going. Carreon Luggage." I believe that my leveraging my new found fame I will be able to monetize it and then take the money and dinotize(R) it. I have brought this idea to two separate firms so far and they've turned me down, which further proves the [Mafia CIA Illuminati Luciferist](#) conspiracy against me. So I ask that you all [please begin placing funds in a trust that I will manage](#), and we'll split profits accordingly. Once we have the initial investment down, I will contact my [supporters in Asia](#) to begin production of the Luggage which will be sold at flea markets and by street vendors. If anything goes wrong with the initial strategy, we'll blame someone else for our failings and sue them to recuperate at least \$200,000. If anyone writes a review critical of [our prices](#) or quality, we'll sue them too for lost dinosaur profits. This will work...

Entrepreneur Awesomeness,

Charles Carreon Esq,

Share this:

4

Facebook

Twitter 1

Email

Like this:

Like One blogger likes this.



### I am big in Asia.

June 28, 2012

[Censorship](#), [Charles Carreon](#), [Douchebaggery](#)

[4 Comments](#)

So I can't read Chinese but [I'm pretty sure this article says how awesome I am](#). It's probably full of factual accounts of how I am a champion of freedom. I bet it's talking about how I am standing up for decency by stopping charities from receiving over \$200k because the people donating were angry. [You can't donate angry](#). You can only donate while riding unicorns that shit skittles. You certainly can't donate to make [me look like a fool](#). I think 99% of America wants me to stop this Inman character and his [Cash Christ](#) mentality. I can't believe he can just go around [bribing bears and cancer patients](#) with no remorse or moral compass. What next? [Politicians taking bribes to insert amendments to laws](#)? It's really only a very vocal minority that keeps slandering me. Calling me all sorts of terrible names, like "Charles Carreon" and "Jack Thompson." The only thing I don't get is what the hell does [Barbara Streisand](#) have to do with it? Either way it is time to go full Rakofsky.

All I know is that when this is all over, I am going to take my [\\$220,024 plus attorney fees](#) and go to Asia where I can get a little r-c-s-p-e-c-t. I heard they find Tyrannosaurus Rex fossils in [Mongolia](#) all the time. Does anyone know how much a live Tyrannosaurus Rex would set me back? I bet China would be a great place to [silence your critics](#)...

## Exhibit C



Hello Hainan,

Charles Carreon Esq.

Share this:

4

Facebook 2

Twitter 1

Email

Like this:

Like One blogger likes this.



## I don't see any f'ing dinosaurs people.

June 27, 2012

[Censorship](#), [Charles Carreon](#), [Douchebaggery](#)

[20 Comments](#)

All right. Enough is enough. People keep going and spouting off my name like it's okay to run around and infringe my trademark. I tell you what, until I see some fucking Tyrannosaurs running around my back yard you should all just shut your mouth up. Shit just got real. If you don't stop using my name immediately. You will suffer the below remedies.

1. I will sue you for no less than \$1,000,000
2. I will take your domain names and point them at this blog.
3. I will obtain pictures of your face for Tara's art
4. I will make you watch this video for 10 days nonstop.
5. I will make you clean up dinosaur poop, when I indeed secure dinosaurs.

I am serious people. My name is unspeakable without express written consent. If you write it down, that's like speaking it forever. So really, I am entitled to infinity damages. Also I am offering a \$500 reward to anyone who can link me to someone using my name. I need more lawsuits. More.

Not Going To Take It,

Charles Carreon Esq.

Share this:

5

Facebook 4

Twitter 1

Email

Like this:

Like One blogger likes this.



## Oh yes she did.

June 27, 2012

[Freedom](#)

[Leave a Comment](#)



COMIC

### LLB's Delicious Oatmeal That Might Have Been

by Ann Bransom

Support freedom of speech and hilariously, by donating to two amazing char...

This week the Internet watched as an attorney tried to halt charitable giving and attack the First Amendment rights of a web comic, because said attorney's feelings were hurt. What started as an amazing charity, which proved beyond a shadow of doubt the lengths the Internet is willing to go to preserve our rights to freedom of speech and help out great causes in the process, quickly became a legal

circus, with the butthurt attorney as the ring leader. As a result of his legal shenanigans two charities that might have received sizable donations, now will not.

Share this: 12 Facebook 4 Twitter 2 Email

Like this: Like 4 bloggers like this.



## I find myself at a loss for words.

June 27, 2012

Charles Carreon, Douchebaggery

8 Comments

Why can't I get my \$200,000 without such a hassle? I have been vilified by the gestapo press and the Cannibal Kids out there. I have had this Ann lady call me a clothespin eater. I've had my peers shoot down my every legal theory. I just... I'm not feeling so high on life right now.

I leave you with some words from Tara:

And these Yellow Journalists say that's how the "INTERNET" works. That's not how the "INTERNET" works, it's how it doesn't work. These Yellow Journalists want to give the Internet to Loki. This attack against FunnyJunk and Charles Carreon is an attack against law and order. Matt Inman is an Internet anarchist. Fascists always love an anarchist. And the Journalists are part of the conspiracy, egging everyone on with their hate headlines, and advice for everyone to get crazy and ATTACK, ATTACK, ATTACK! There's something very bad going on here, which greatly benefits the Publishing Industry, and the copyright chicken hawks. And I don't know why we can't get a simple yes or no from ANYONE about whether Matt Robert Inman is related to Bobby Ray Inman. Apparently, every journalist in the world doesn't seem to think that knowing WHO Matt Inman is is important. He's a man without parents, brothers and sisters, or childhood friends. A man without a past, just like Barack Obama. Sure, there's lots of famous people like that in the world! Usually, they are children of Intelligence Agents, or Intelligence Agents themselves.

You got that right babe. Damn yellow journalist giving us up to Loki. Haven't you people seen the Avengers movie?! LOKI IS THE BAD GUY!

Tinfoil Hat On and Ready,

Charles Carreon Esq.

Share this: 6 Facebook 3 Twitter 1 Email

Like this: Like 2 bloggers like this.



## Snakes in the grass.

June 26, 2012

Censorship, Charles Carreon, Douchebaggery

8 Comments

Let me warn you all there are devious creatures out there, Tara call them Pisacca (Pishacha but she can't spell), some call them demons, or pterodactyls, I call them snakes. These snakes feed you logical conclusions and try to make you a true believer in the devil Matthew Inman. So the question is, what do you do when the grass harbors snakes? You cut it down.

Think of the internet as a large field of tall grass, and you and your loved ones are walking through it. Do you want to be envenomed by these snakes? Do you want to give to charity because you are spitefully filled with venom? No you don't. I know, because only I can tell you what to think.

We must burn the grass to the ground, we must cut it with our teeth and stop these snakes from slithering in and out of the inter tubes. There can be no true freedom when people can make fun of such a righteous man as I. I am freedom, by making fun of me, you are attacking freedom.

Your Ricki Tiki Tavi,

Charles Carreon Esq.

Share this: 5 Facebook 2 Twitter 1 Email

Like this: Like One blogger likes this.



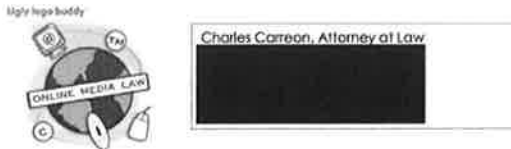
## All of your domains are belong to me.

June 26, 2012

Censorship, Charles Carreon, Douchebaggery

28 Comments

Step 2 in Operation Dead Bears and Happy Cancer. Remove any references from my name online that don't directly quote me and support my statements. I submit this evidence to you my readers of how righteous my cause is, and that I will silence my detractors through any claims possible!



June 21, 2012

Email to:  
Via email to:

Re: Demand to Cease and Desist Cybersquatting and Trademark  
Infringement: Charles-Carreon.com

Dear Sir or Madam:

I am the registrant of the Charles Carreon trademark, USPTO Registration Number 3,749,709 ("Charles Carreon®") in International Class of Goods and Services 45 for "legal services." (Attachment 1 - Certificate of Registration.) I am also the registrant of CharlesCarreon.com, CharlesCarreon.net, CharlesCarreon.org, and Carreon.co. The CharlesCarreon.com website is my professional website.

### Charles-Carreon.com

The Charles-Carreon.com website was registered by a person unknown to me, and a website is published there that is intended to mislead and is misleading Internet users into believing that it is my website, thus infringing my trademark. The registrant of Charles-Carreon.com is Register.com, operating as Domain Discreet Privacy Service ("Register.com"). Register.com's customer (the "Private Registrant") is cybersquatting my trademark, and this letter requests Register.com's cooperation to end the infringement.

### Notice of ACPA Violation

The Private Registrant has clearly engaged in a bad faith registration and use of the infringing domain, in a violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. Sec. 1114 and 1125 (the "ACPA"). Charles-Carreon.com is confusingly similar to iCall's trademark or service mark. The infringer's domain name usurps the Charles Carreon® mark.

### The Application of the RAA

When Register.com provides privacy protection service, it replaces the registrant's information in the whois database and it increases its risk of being

held liable for harm caused by wrongful use of the registered name. see, ICANN Registrar Accreditation Agreement ("RAA"), §3.7.7.3 which provides

Any Registered Name Holder that intends to license use of a domain name to a third party is nonetheless the Registered Name Holder of record and is responsible for providing its own full contact information and for providing and updating accurate technical and administrative contact information adequate to facilitate timely resolution of any problems that arise in connection with the Registered Name. *A Registered Name Holder licensing use of a Registered Name according to this provision shall accept liability for harm caused by wrongful use of the Registered Name, unless it promptly discloses the identity of the licensee to a party providing the Registered Name Holder reasonable evidence of actionable harm.* (Emphasis added)

A private registration service cannot distance itself from the improper actions of a hidden registrant. "If it chooses to act as a 'front' in these situations, it has to bear responsibility for what goes on behind it." *Dr. Ing. h.c. F. Porsche AG v. Domains by Proxy, Inc.*, No. D2003-0230 (WIPO Arbitration and Mediation Center, May 16, 2003)

For a decision that outlines the consequences for a private registrar for failing to disclose the identity of a cybersquatter please see, *Transamerica Corp v. Moniker Online Services, LLC*, 672 F. Supp. 2d 1353, 1361 (S.D. Fla. 2009)

#### Notice of Private Domain Registration Services Violation

Register.com are hereby notified that the private registrant's use of the infringing domain for bad faith purposes violates the provisions of Register.com's own Private Domain Registration Services Addendum (the "PDRSA"), that states at Section 4, in relevant part:

"Register.com also represent and warrant that Register.com are using the Private Registration Services in good faith and that Register.com have no knowledge or reason to believe that Private Registration Domain or the content found at any associated IP address infringes upon conflicts with the legal rights of any third party, including, without limitation, any third party's copyrights, patents, trademarks or trade names. Register.com also warrant that either the Private Registration Services nor Private Registration Domains will be used in violation of the Register.com Acceptable Use Policy or otherwise in connection with any illegal or morally objectionable activity."

The Private Registrant's bad faith registration of Charles-Carreon.com is one element of a broad-scale cybervandalism campaign that is the subject of a lawsuit entitled *Carreon v. Inman*, United States District Court for the District of Northern California Case # CV 12 3112. A copy of the Complaint commencing the action is

Charles Carreon, Esq.

Page 8

6/21/2012

transmitted herewith. The Complaint alleges the infringement of the Charles Carreon® mark by the creation of two fake Twitter accounts that were created in order to take over my avenues of free speech and convert them to conduits of disinformation about me. The Private Registrant is doing the same thing by cybersquatting the Charles-Carreon.com domain.

Tomorrow I am going to amend the Complaint to allege a claim for cybersquatting in violation of the ACPA, with a prayer for imposition of the maximum \$100,000 statutory penalty against fictitiously-named Defendant Doe 2.

I hereby request that, prior to 3 p.m. PST on Friday June 22, 2012, Register.com:

1. Take down the Charles-Carreon.com website,
2. Close the registrant account for Charles-Carreon.com,
3. Disclose the Private Registrant's name and contact information to me, and
4. Agree to deposit the Charles-Carreon.com domain into court for disposition pursuant to court order.

If Register.com discloses the identity of the Private Registrant prior to 3 p.m., I will name the Private Registrant as Doe 2 in the First Amended Complaint. If Register.com fails to disclose the identity of Private Registration by the 3 p.m. deadline, I will be forced to name Register.com as Doe 2 in the First Amended Complaint.

Accordingly, I look forward to your prompt cooperation with these reasonable requests.

Very truly yours,

Charles Carreon

Tara says this should be enough to make even the most hated members of the Pterodactyl Killer gang tremble in their computer chairs. Damn it, I forgot to demand pictures of the person's face so Tara could draw penises on them. Well, I guess I could amend the complaint in like 3 days later. No big deal. I also need to demand more dinosaurs...

Your Righteous Defender of Silence,

Charles Carreon Esq.

Share this:

6

Facebook 3

Twitter 6

Email

Like this:

Like One blogger likes this.



Search

## Recent Posts

- [Carreon Luggage.](#)
- [I am big in Asia.](#)
- [I don't see any f'ing dinosaurs people.](#)
- [Oh yes she did.](#)
- [I find myself at a loss for words.](#)

## Archives

- [June 2012](#)

## Categories

- [Brett Kimberlin is Evil](#)
- [Censorship](#)
- [Charles Carreon](#)
- [Douchebaggery](#)
- [Freedom](#)

## Meta

- [Register](#)
- [Log in](#)
- [Entries RSS](#)
- [Comments RSS](#)
- [WordPress.com](#)

## Blogroll

- [Blogger Defense Team](#)
- [Electronic Frontier Foundation](#)
- [Make Me A Day](#)
- [Popehat](#)
- [Public Citizen](#)



u



Charles Carreon, Attorney at Law  
2165 S. Avenida Planeta  
Tucson, Arizona 85710  
chas@charlescarreon.com  
Telephone: 520-841-0835  
Fax: 520-843-2083

June 21, 2012

Email to: fe887dc60a1612203829cf8d1d5e53d1@domaindiscreet.com  
Via email to: legal@register.com

Re: Demand to Cease and Desist Cybersquatting and Trademark  
Infringement: Charles-Carreon.com

Dear Sir or Madam:

I am the registrant of the Charles Carreon trademark, USPTO Registration Number 3,749,709 ("Charles Carreon®") in International Class of Goods and Services 45 for "legal services." (Attachment 1 – Certificate of Registration.) I am also the registrant of CharlesCarreon.com, CharlesCarreon.net, CharlesCarreon.org, and Carreon.co. The CharlesCarreon.com website is my professional website.

**Charles-Carreon.com**

The Charles-Carreon.com website was registered by a person unknown to me, and a website is published there that is intended to mislead and is misleading Internet users into believing that it is my website, thus infringing my trademark. The registrant of Charles-Carreon.com is Register.com, operating as Domain Discreet Privacy Service ("Register.com"). Register.com's customer (the "Private Registrant") is cybersquatting my trademark, and this letter requests Register.com's cooperation to end the infringement.

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**The Application of the RAA**

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Exhibit D

held liable for harm caused by wrongful use of the registered name. see, ICANN Registrar Accreditation Agreement ("RAA"), §3.7.7.3 which provides

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If Register.com discloses the identity of the Private Registrant prior to 3 p.m., I will name the Private Registrant as Doe 2 in the First Amended Complaint. If Register.com fails to disclose the identity of Private Registration by the 3 p.m. deadline, I will be forced to name Register.com as Doe 2 in the First Amended Complaint.

Accordingly, I look forward to your prompt cooperation with these reasonable requests.

Very truly yours,



Charles Carreon  
2012.06.21  
23:36:42 -07'00'

Charles Carreon

# ATTACHMENT “A”

# United States of America

United States Patent and Trademark Office

Charles Carreon

**Reg. No. 3,749,709** CHARLES CARREON (UNITED STATES INDIVIDUAL)  
Registered Feb. 16, 2010 2165 S AVENIDA PLANETA  
TUCSON, AZ 85710

**Int. Cl.: 45** FOR: LEGAL SERVICES, IN CLASS 45 (U.S. CLS. 100 AND 101),

FIRST USE 4-7-1995; IN COMMERCE 4-7-1995.

**SERVICE MARK**  
**PRINCIPAL REGISTER**

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

THE NAME "CHARLES CARREON" IDENTIFIES A LIVING INDIVIDUAL WHOSE CONSENT IS OF RECORD.

SER. NO. 77-780,946, FILED 7-14-2009.

KAREN BRACEY, EXAMINING ATTORNEY



*David J. Kybas*

Director of the United States Patent and Trademark Office

## Paul Alan Levy

---

**From:** Paul Alan Levy  
**Sent:** Friday, June 22, 2012 5:42 PM  
**To:** chas@charlescarreon.com; legal@register.com  
**Subject:** Your threats of litigation over charles-carreon.com

This will respond to your threat to sue both my client, the anonymous individual whose parody web site about you is located at [www.charles-carreon.com](http://www.charles-carreon.com), and Register.com for registering that name with privacy protections

I have explained to you that *Bosley Medical v. Kremer*, 403 F.3d 672 (9th Cir. 2005), and *Nissan Motor Co. v. Nissan Computer Co.*, 378 F.3d 1002 (9th Cir. 2004), both preclude the use of trademark law to stop my client's use of a web site posted at a domain name that uses your trademark as a site for nonp-commercial criticism directed at you. There are, indeed, numerous cases in other circuits that protect the right to use a domain name in the form [www.trademark.com](http://www.trademark.com) for a web site about the trademark holder against a variety of trademark claims. *Utah Lighthouse Ministry v. Foundation for Apologetic Information and Research*, 527 F.3d 1045 (10th Cir. 2008); ; *Lamparello v. Falwell*, 420 F.3d 309 (4th Cir. 2005); *TMI v. Maxwell*, 368 F.3d 433, 436-438 (5th Cir. 2004); *Taubman v. WebFeats*, 319 F.3d 770 (6th Cir. 2003).

Moreover, a suit against Register.com for trademark infringement through the domain name is forbidden by Ninth Circuit law. *Lockheed Martin Corp. v. Network Solutions*, 194 F.3d 980 (9th Cir. 1999). I don't represent register.com, but we do have an interest in your threat of litigation against that entity because you use it to try to induce Register.com to violate its confidentiality agreement with my client. And you don't have to sue Register.com for that reason – you can simply sue Doe as a Doe, then use a subpoena to try to identify Doe – a subpoena that would be denied enforcement because you have no valid claims against Doe.

Finally, you assert that Doe is engaged in cybersquatting under the DMCA. You can't make out such a claim because there is no "bad faith intent to profit." Indeed, several courts have specifically refused to apply the DMCA to gripe sites about the trademark holder. *E.g.*, *Utah Lighthouse*, *Lamparello* and *Lucas Nursery and Landscaping v. Grosse*, 359 F.3d 806 (6th Cir. 2004). You acknowledged that Doe has not tried to get you to pay money for the domain name; your speculation that Doe might do that sometime in the future is not a basis for suing now.

For all these reasons, your threatened lawsuit is foreclosed by precedent in the jurisdiction where you threaten to file it. Consequently, we will certainly seek an award of attorney fees for meritless litigation directed at expression that you do not like. *Mattel v. Walking Mountain Productions*, 353 F.3d 792, 816 (9th Cir. 2003)

Finally, you called me a few minutes ago to warn me that you are getting ready to send a DMCA notice based on the use of a photograph on the parody site at [www.charles-carreon.com](http://www.charles-carreon.com) which, you assume, is a copy of a photograph in which you own the copyright. As I told you then, caselaw in the Northern District of California holds that someone sending a DMCA notice must consider fair use. *See Lenz v. Universal Music Corp.*, 572 F. Supp.2d 1150 (N.D. Cal. 2008). You did not offer any reason to believe that the fair use defense would not succeed; instead, you changed the topic by suggesting that you had a right to object to use of your name and likeness. But those arguments are not copyright theories that would support a DMCA notice.

Exhibit E

Consequently, I hope you will refrain from pursuing either the lawsuit or the DMCA notice that you threaten.

Paul Alan Levy  
Public Citizen Litigation Group  
1600 - 20th Street, NW  
Washington, D.C. 20009  
(202) 588-1000  
<http://www.citizen.org/Page.aspx?pid=396>

## Paul Alan Levy

---

**From:** Charles Carreon, Esq. <chascarreon@gmail.com>  
**Sent:** Saturday, June 23, 2012 12:33 AM  
**To:** Paul Alan Levy  
**Subject:** Re: Third Send: Carreon v. Inman et al., Case No. C-12-03112-DMR / Service of Process

Paul,

Thank you, I accept your proffer to keep these communications confidential, except as indicated in the last line of this email, where I ask you to send this email thread to Joan Claybrook, the Public Citizen Board, and Ralph Nader.

I copied you with the letter so you'll know I'm proposing a settlement to Inman that would remove the link your client is giving him, thus ensaring Inman in claims of profiting from the revenue derived from a cybersquatted domain. If Inman declines the settlement and doesn't ask your client to remove the link, he ratifies her conduct, and is therefore vicariously liable under the ACPA, Copyright and MNL claims.

As far as when and where I will sue your client, be certain that it will occur if your client does not cede the domain, and advise her of ten things:

1. That there is essentially no statute of limitations on this claim, and the prima facie laches defense would not kick in for at least three years.
2. That venue in this action can be validly laid in at least three places, maybe four, if she doesn't live in Arizona, Florida, or California.
3. That I am capable of employing counsel to handle my claim against her, who will incur attorneys fees and seek recovery of the same. I filed pro se against Inman simply for the sake of convenience and the need for speed, and not from a lack of resources.
4. That the law in this area cannot be predicted with certainty, will evolve substantially over the next three years, during which I will be using digital forensics to establish actual trademark damages in addition to seeking the maximum cybersquatting penalty of \$100,000.
5. That a judgment that recites that the domain was obtained by fraud upon the registrar, in the form of a misrepresentation that she did not know of my trademark on the name, might well be non-dischargeable in bankruptcy.
6. That a judgment can be renewed indefinitely until collected, and that California judgments accrue 10% interest, which can compounded once ever ten years by capitalizing the accumulated interest.
7. That you cannot guarantee that Public Citizen will provide her with free legal services on June 1, 2015, when I may very well send the process server 'round to her door.
8. That I have the known capacity to litigate appeals for years (check my Westlaw profile, and of course, the drawn out history of Penguin v. American Buddha, now in its third year, having passed through the Second Circuit and the NYCA, and still hung up in personal jurisdiction in the SDNY).
9. That the litigation, being of first impression in virtually every Circuit, grounded in a federal question, involving a registered trademark, and dispositive of many open issues in the field of Internet commerce and speech, might very well continue for a decade.
10. That Public Citizen might well be unable and/or unwilling to provide her with representation until the resolution of such an extended course of litigation.

Finally, as a longtime member of Public Citizen and major contributor to Ralph Nader's last presidential bid, I am utterly disgusted to see the organization he founded leaping to the defense of someone who is in league with

Exhibit F

a person who has harnessed the lowest impulses of puerile, vituperative Internet youth to generate a Charitable Fund that has been used to bribe two major charities into tacitly endorsing a campaign that is utterly devoid of charitable purpose, and is a mere cover for a hate campaign.

Apparently Public Citizen is now a proponent of charitable fraud and misrepresentation, and feels that misogynistic hate speech trumps a lawyer's right to keep control of his trademarked image in the field of legal services, where a lawyer's name is everything.

The membership news I regularly receive from Public Citizen about mislabeled drugs and health care fraud is apparently a mere cloak for some absurd agenda being dictated by pointy-headed Internet mavens with no concern for the public good and a vested interest in legitimizing Netwar and digital lynching.

Please forward this email to the Director and the Board of Public Citizen, and to Ralph Nader and let them know what you are up to, because you are up to your eyeballs in foolishness.

Charles