

Google, Inc.
ATTN: User Support, DMCA complaints
2400 Bayshore Pkwy
Mountain View, CA 94043

Jan. 23, 2003

This is to file a formal complaint re: my web site, <http://www.candylandcrafts.com/> which has been "pirated" by <http://www.thrushs.com>

First of all I would like to thank Google for the fast and professional response to my initial email. I've been using Google AdWords select for a long time and have been extremely pleased with the results. I am absolutely delighted that Google takes the matter of web theft seriously!

I am in process of initiating litigation against the offender, but am making every parallel effort to get their site "delisted". I have contacted their ISP as well.

Below is a summary of the information you have requested:

1. The offender, Thrushs, has basically stolen my entire web site, as far as I can determine, on or about March 2002. They have changed the font colors, and done some very minor tailoring of a few items, but, generally speaking, the page layouts, the table structure, the images, the product descriptions, the prices (this was a surprise!) and the part numbers have been copied verbatim. (the part numbers of a particular vendor of course will be the same for anyone.....but I modified the part numbers for use on my site by deleting the date codes and adding a prefix on some others) I have approximately 350 pages on my site. When I went through Thrushs site in detail, I identified approximately 100 pages that are from Candyland Crafts. (I also incidently have already sent Thrushs' the list of ~ 100 pages.

One other thing I noticed on their site: They have a number of product indices (copied from Candyland Crafts) without links to the relevant supporting product pages. It's fairly evident that they are still "in process" of converting my site to their own.

2. Per your instructions, below I have listed a number of specific web searches that result in links to pages taken from Candyland Crafts by Thrushs. I have listed them as you asked, by Search Query and the Infringing Web Pages URL (copied from The Google search result. (I'm sure I haven't found them all, if I find additional items I will follow up accordingly)

Search Query: ann clark cookie cutters

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/baking%20supplies/Cookie%20Cutters/cookie%20cutters.htm - 27k

www.thrushs.com/SUPPLY%20STORE/baking%20supplies/Cookie%20Cutters/Ann%20Clark%20Cutter/ann_clark.htm - 75k

Search Query: edible glitter

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/food%20Items/edible_glitter.htm - 47k

Search Query: pastry fillings

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/food%20Items/pastry_fillings.htm - 38k

Search Query: cellophane bags

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/Cellophane%20Bags/cellophane_bags.htm - 44k

Search Query: merckens chocolate

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/Merckens%20Wafers/merckens_10_to_50.htm - 44k

Search Query: tuk-n-ruffle

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/boards%20boxes/cake_ruffle.htm - 101k

Search Query: cake doilies and fancy foil wrap

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/boards%20boxes/Packaging%20Index/packaging_index.htm

Search Query: masonite circles and boards

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/boards%20boxes/manc.htm

www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/boards%20boxes/cake_circles_&_cake_boards.htm

Search Query: ruffle boards

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/boards%20boxes/ruffle_boards.htm

Search Query: show and serve boards

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/boards%20boxes/ruffle_boards.htm - 56k

Search Query: baking and muffin cups

Infringing Web Pages: www.thrushs.com/.../boards%20boxes/Baking%20&%20Muffin%20Cups/baking_&__muffin_cups.htm - 40k -

Search Query: decorating aids

Infringing Web Pages:

www.thrushs.com/.../cake%20making%20supplies/Decorating%20Sets%20Index/Decorating%20Aids/decorating_aids.htm - 31k

Search Query: decorating sets

decorating sets & accessories

cake decorating sets

Infringing Web Pages:

www.thrushs.com/.../cake%20making%20supplies/Decorating%20Sets%20Index/Decorating%20Sets%20Index.htm - 26k

Search Query: press sets, dividers

Infringing Web Pages: www.thrushs.com/.../decorating_press_sets,_dividers,_servers.htm - 35k

Search Query: decorating sets accessories index

Infringing Web Pages:

www.thrushs.com/.../cake%20making%20supplies/Decorating%20Sets%20Index/Decorating%20Sets%20Index.htm - 26k

Search Query: decorating tip sets

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/Decorating%20tips/decorating_tips.htm - 39k

Search Query: dusting powders

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/food%20Items/dusting_powders.htm - 32k

Search Query: petal dusting powder

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/food%20Items/petal_dust.htm - 51k

Search Query: sparkle dusting powder

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/food%20Items/sparkle_dust.htm - 46k

Search Query: pearl dusting powder

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/food%20Items/sparkle_dust.htm

Search Query: flower making sets and tools

Infringing Web Pages:

www.thrushs.com/.../cake%20making%20supplies/Fondant%20&%20Tools/flower__making_sets_&_tools.htm - 41k

www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/Fondant%20&%20Tools/Fondant%20&%20Tools.htm - 26k

Search Query: fondant mold sets

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/Fondant%20&%20Tools/fondant_molds.htm - 4

Search Query: ready to use fondant

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/Fondant%20&%20Tools/Fondant%20&%20Tools.htm - 26k

Search Query: gum/sugar paste & confectionery tools

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/Fondant%20&%20Tools/Fondant%20&%20Tools.htm - 26k

www.thrushs.com/.../cake%20making%20supplies/Fondant%20&%20Tools/flower__making_sets_&_tools.htm - 41k

Search Query: cookie presses

Infringing Web Pages:

www.thrushs.com/SUPPLY%20STORE/baking%20supplies/Cookie%20Cutters/Cookie%20Presses/cookie_presses.htm - 37k

Search Query: cookie decorating kit

Infringing Web Pages:

www.thrushs.com/SUPPLY%20STORE/baking%20supplies/Cookie%20Cutters/Decorating%20Kit/cookie_decorating_kit.htm - 27k

Search Query: metal cookie cutter sets

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/baking%20supplies/Cookie%20Cutters/cookie%20cutters.htm - 27k

Search Query: nesting cookie cutters

Infringing Web Pages: www.thrushs.com/.../baking%20supplies/Cookie%20Cutters/NESTING%20COOKIE%20CUTTERS/nesting_cookie_cutters.htm - 35k

Search Query: nested cutter sets-1

Infringing Web Pages:

www.thrushs.com/.../Cookie%20Cutters/STAINLESS%20CUTTERS%20&%20SETS/nested_cutter_sets_1.htm - 50k

Search Query: comfort grip cutters

Infringing Web Pages: www.thrushs.com/.../baking%20supplies/Cookie%20Cutters/Comfort%20Grip%20Cutters/comfort_grip_cutters.htm - 48k

Search Query: plastic perimeter cutters

Infringing Web Pages:

www.thrushs.com/.../Cookie%20Cutters/Plastic%20Perimeter%20Cutters/plastic_perimeter_cutters.htm - 66k

Search Query: contour cake pans

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/cake%20making%20supplies/cake%20pans/bevel,_contour_cake_pan.htm - 31k

Search Query: springform pans

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/baking%20supplies/SPRING%20FORM%20PANS/spring_form_pans.htm - 33k

Search Query: candy to dip

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/Candy%20To%20Dip/candyto_dipping.htm - 31k

Search Query: candy cups

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/Candy%20Cups/candy_cups.htm - 45k

Search Query: decorating gloves

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/Candy%20Cups/candy_cups.htm - 45k

www.thrushs.com/.../cake%20making%20supplies/Decorating%20Sets%20Index/Decorating%20Sets%20Index.htm - 26k

Search Query: lollipop sticks

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/Lollipop%20Sticks/lollipop_sticks.htm - 61k

Search Query: metallic twist ties

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/Twist%20Ties/twist_ties.htm - 29k -

Search Query: decorating squeeze bottles

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/Squeeze%20Bottle/squeeze_bottles.htm - 33k

Search Query: candy add-ins

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/Candy%20Crunchy%201/candy_add-ins_crunchy.htm - 33k

www.thrushs.com/SUPPLY%20STORE/candy%20supplies/Candy%20Crunchy%202/candy_add-ins_crunchy_2.htm - 32k

Search Query: candy writers

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/
Candy%20Writers/candy_writers.htm - 33k

Search Query: creme centers

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/
CREME%20CENTERS/creme_centers.htm - 27k

Search Query: candy dipping tools

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/
Candy%20Dipping%20Tools/candy_dipping_tools.htm - 43k

Search Query: craft brushes

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/
Craft%20Brushes/craft_brushes.htm - 29k

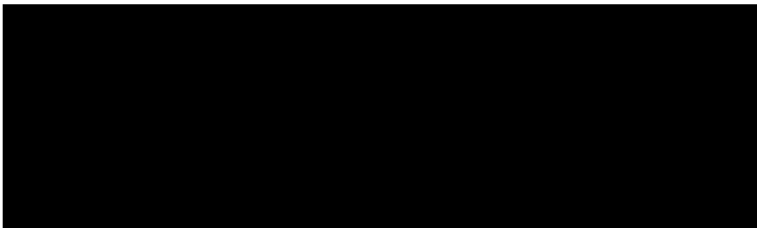
Search Query: candy funnel

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/
Candy%20funnel/candy_funnel.htm - 27k

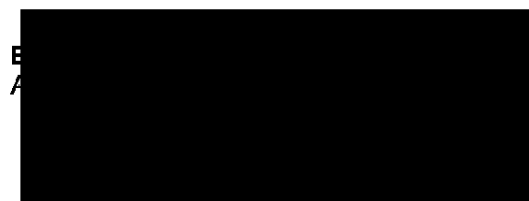
Search Query: wilbur tempering chocolate

Infringing Web Pages: www.thrushs.com/SUPPLY%20STORE/candy%20supplies/
candy_making_supplies.htm - 34k

3. You may contact me at any of the following:



4. Thrushs contact information:



5. *I have good faith belief that use of the copyrighted materials described above on the allegedly infringing web pages is not authorized by the copyright owner, it's agent, or the law.*

6. *I swear, under penalty of perjury, that the information in the notification is accurate and that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.*

