



July 26, 2004

Google, Inc.

Attn: [REDACTED]

Mountain View, CA 94043

Dear Customer Support,

I am filing a DMCA complaint alleging copyright infringement. The copyrighted work at issue is the Travel Industry Dictionary that appears at www.HomeTravelAgency.com/dictionary and subsequent pages.

Here are some search queries that result in the display of material that infringes on my copyright.

Search query	Offending URL
define:rack rate	www.episodestravel.com/dic.R.html
define:leisure travel	www.episodestravel.com/dic.L.html
define:concierge	www.episodestravel.com/dic.C.html
define:continental breakfast	www.episodestravel.com/dic.C.html
define:customs	www.episodestravel.com/dic.C.html
define:inn	www.episodestravel.com/dic.I.html
define:b&b	www.episodestravel.com/dic.B.html
define:american plan	www.episodestravel.com/dic.A.html

There are doubtless others that could be cited.

You will notice that in some cases my copyrighted definition appears along with the infringing material. In other cases, only the stolen definition appears. In fact, the infringer's stolen definitions seem to appear in Google search results more frequently than the real thing! You will also note that the links provided after the infringing definitions do not lead to a dictionary, as the URLs would lead you to believe, but to a page from a "search engine" called TopDotz.

It appears that the infringing party has stolen my copyrighted material and then used it to fool Google into directing traffic to TopDotz. Ironically, then, the infringing material appears not on a page at episodestravel.com but on google.com itself.

A Whois search for episodetravel.com shows that the domain is registered as follows:

Domain Name: EPISODESTRAVEL.COM

Administrative Contact:

Traffic, Keyword [REDACTED]@keywordtraffic.info

PMB # 483

[REDACTED] Suite 330

Blaine, WA 98230-5106

US [REDACTED]

A Whois search for topdotz.com reveals the following:

Domain Name: TOPDOTZ.COM

Administrative Contact:

Keyword Traffic, Premium [REDACTED]@keywordtraffic.info

PMB # 483

[REDACTED]

Blaine, WA 98230-5106

US [REDACTED]

However, the domain keywordtraffic.info does not seem to exist.

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

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]@intrepidtraveler.com