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[REDACTED]  
Quartier St Antoine  
Grasse, FRANCE, 06130  
13 July 2005

Tel [REDACTED]

Google, Inc.

**Attn: Customer Support, DMCA Complaints**

[REDACTED]  
Mountain View, CA 94043

**Fax:** [REDACTED]

**Number of pages: Total 10**

1 page cover

6 pages text

3 pages photos

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**1. The copyrighted work at issue is the text that appears on the following pages of our web site ProvenceBeyond.com as well as 5 photos. Please note that our root domain name is www.beyond.fr, and both URLs refer to the same physical site.**

**Roquebrune page and 2 photos**

<http://www.provencebeyond.com/villages/roquebrunecm.html>

including 2 photos

<http://www.provencebeyond.com/villphotos2/roquebcmP2.html>

<http://www.provencebeyond.com/villphotos2/roquebcmP3.html>

**St Jean Cap Ferrat page and 1 photo**

<http://www.provencebeyond.com/villages/stjeancf.html>

including a photo

<http://www.provencebeyond.com/villphotos2/stjeancfP04.html>

**St Tropez page and 2 photos**

<http://www.provencebeyond.com/villages/sttropez.html>

including 2 photos

<http://www.provencebeyond.com/villphotos2/sttropezP02.html>

<http://www.provencebeyond.com/villphotos2/sttropezP08.html>

**Antibes page**

<http://www.provencebeyond.com/villages/antibes.html>

**Photos:** We have provided you with printouts of the original 5 photos, which you will see, are larger than the cropped versions we used on online and that were stolen, sometimes cropped a bit more, sometimes not. We can send the files to you by email if you wish.

**Meta description:** Our slogan for many years, used as our meta description was :

"An informative view of the back country 'Beyond' the French Riviera with numerous photos, ancient villages, interesting sites, current events and selected other links"  
This can be found by looking up [www.beyond.fr](http://www.beyond.fr) in Yahoo, where the database as of 12 July still contains many pages using this meta description (which we changed in June 2005).

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## 2. Summary

Search enquiry is "france-hotel.org.uk" or "gulf-of-saint-tropez.org" both of which are in your cache, or any of the other URLs listed below.

**The material that is infringing our copyright is displayed on a number of different web sites that appear to be part of a single "system" based on the information we have found regarding:**

- the name of the owner of the domain names (with 3 exceptions, see table in part 3),
- the fact that all the sites provide hotel booking services for France in particular, but also other places
- they use booking engines SecureBooking.com or usabooking.net which are owned by the same person in question.

The "system" includes the following URLs:

**a. Sites describing hotels and cities, of which all include stolen content from our site [provencebeyond.com](http://provencebeyond.com) ([beyond.fr](http://beyond.fr))**

[france-hotel.org.uk](http://france-hotel.org.uk)  
[hotelsdeluxe.net](http://hotelsdeluxe.net)  
[la-cote-dazur.com](http://la-cote-dazur.com)  
[francebooking.net](http://francebooking.net)  
[gulf-of-saint-tropez.org](http://gulf-of-saint-tropez.org)  
[1french-riviera.com](http://1french-riviera.com)

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**b. A site with a distorted version of the Yahoo domain name which links to many of the sites in this "system": (owned by the same person)**

ahyoo.com

**c. A "search engine" that seem to offer results only or mainly from the sites on this list or related to them: " (owned by the same person)**

loladelsol.com

**d. Booking engines which appear to be used by the sites above, both owned by the same person:**

securebooking.com

usabooking.net

**e. sites that link to the URLs above include**

Besthotelsintheworld.com

**f. Two other sites that are related to those above are:**

worldwideluxuryhotels.net

and [www.db56.com](http://www.db56.com) " (owned by the same person)

## (Part 2: Details on infringement)

### FROM THE WEB SITE FRANCE-HOTEL.ORG.UK

<http://france-hotel.org.uk/Roquebrune/index.php>

<http://france-hotel.org.uk/StJeanCapFerrat/index.php>

<http://france-hotel.org.uk/StTropez/index.php>

#### Color-coded Copyscape versions of these pages:

<http://www.copyscape.com/view.php?o=72765&u=http%3A%2F%2Ffrance-hotel.org.uk%2FRoquebrune%2Findex.php&t=1121188535&s=http%3A%2F%2Fwww.provencebeyond.com%2Fvillages%2FRoquebrunecm.html&w=40&c=>

<http://www.copyscape.com/view.php?o=72897&u=http%3A%2F%2Ffrance-hotel.org.uk%2FStJeanCapFerrat%2Findex.php&t=1121189050&s=http%3A%2F%2Fwww.provencebeyond.com%2Fvillages%2Fstjeancf.html&w=19&c=>

### FROM THE WEB SITE HOTELSDELUXE.NET

<http://hotelsdeluxe.net/SaintTropez/index.html>

#### Color-coded Copyscape versions of these pages:

<http://www.copyscape.com/view.php?o=72970&u=http%3A%2F%2Fhotelsdeluxe.net%2FSaintTropez%2Findex.html&t=1121189241&s=http%3A%2F%2Fwww.provencebeyond.com%2Fvillages%2Fsttropez.html&w=27&c=>

### FROM THE WEB SITE LA-COTE-DAZUR.COM

<http://la-cote-dazur.com/roquebrune/>

<http://la-cote-dazur.com/sttropez/>

<http://la-cote-dazur.com/golf/>

(beach photo mid-page is ours)

<http://la-cote-dazur.com/antibes/antibes.html>

#### Color-coded Copyscape versions of these pages:

<http://www.copyscape.com/view.php?o=72765&u=http://la-cote-dazur.com/roquebrune/&t=1121188535&s=http://www.provencebeyond.com/villages/roquebrunecm.html&w=25&c=>

<http://www.copyscape.com/view.php?o=72970&u=http%3A%2F%2Fla-cote-dazur.com%2Fsttropez%2F&t=1121189241&s=http%3A%2F%2Fwww.provencebeyond.com%2Fvillages%2Fsttropez.html&w=27&c=>

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<http://www.copyscape.com/view.php?o=72970&u=http%3A%2F%2Ffla-cote-dazur.com%2Fgolf%2F&t=1121189241&s=http%3A%2F%2Fwww.provencebeyond.com%2Fvillages%2Fsttropez.html&w=27&c=>

<http://www.copyscape.com/view.php?o=73165&u=http%3A%2F%2Ffla-cote-dazur.com%2Fantibes%2Fantibes.html&t=1121189863&s=http%3A%2F%2Fwww.beyond.fr%2Fvillages%2Fantibes.html&w=18&c=>

#### FROM THE WEB SITE FRANCEBOOKING.NET

<http://www.francebooking.net/Roquebrune/>

<http://www.francebooking.net/stjeancapferrat/>

#### Color-coded Copyscape versions of these pages:

<http://www.copyscape.com/view.php?o=72765&u=http%3A%2F%2Ffrancebooking.net%2FRoquebrune%2F&t=1121188535&s=http%3A%2F%2Fwww.provencebeyond.com%2Fvillages%2FRoquebrunecm.html&w=25&c=>

<http://www.copyscape.com/view.php?o=72897&u=http%3A%2F%2Ffrancebooking.net%2FStJeanCapFerrat%2Findex.html&t=1121189050&s=http%3A%2F%2Fwww.provencebeyond.com%2Fvillages%2Fstjeancf.html&w=30&c=>

#### FROM THE WEB SITE GULF-OF-SAINT-TROPEZ.ORG

<http://www.gulf-of-saint-tropez.org/StTropez/>

text and photo as listed above

links on the home page lead to other sites referred to already in this memo

#### FROM THE WEB SITE 1FRENCH-RIVIERA.COM

Use of our meta description slogan at the bottom of the home page of <http://1french-riviera.com/>

along with the photo of the beach identified above.

#### Other sites that appear to be "part of the system"

##### ahyoo.com

<http://ahyoo.com/>

This site links to several sites above that contain the stolen material

##### Securebooking.com

<http://www.securebooking.com/> this home page links extensively to the sites listed above containing the stolen material, and links to other sites as well, some owned by the same person

##### Besthotelsintheworld.com

<http://besthotelsintheworld.com/>

This home page links extensively to the sites listed above containing the stolen material, and links to other sites as well, and is hosted by the same company as many sites listed above. I was not able to find the domain name owner.

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### 3. Contact information for myself

I can be contacted at [REDACTED]@netjmc.com.

### 4. Contact information for the infringer

The email contact for the person in the Whosis is [REDACTED]@fccint.com or a variation thereof, for some sites when the owner of the domain name is different (ref table below.)

Before realizing the extent of the "system", I attempted contact with the owner of france-hotel.org.uk ([REDACTED]@france-hotel.org.uk) but my email was undeliverable.

The hosting companies for most of the sites are Hurricane (Fremont California) and some at ServePath (San Francisco). All the email contacts are from a company with an address in Japan: fccint.com.

FCCINT.COM (according to Whosis) is hosted by Hurricane  
 64.62.251.21  
 Hurricane Electric HURRICANE-4 (NET-64-62-128-0-1)  
 64.62.128.0 - 64.62.255.255  
 Argon Blue HURRICANE-CE0923-381 (NET-64-62-251-0-1)  
 64.62.251.0 - 64.62.251.255

There are 4 people on the lists below:

[REDACTED] who is the owner of almost all the domain names, and 3 other people, 2 of whom have email at his root email at fccint.com:

[REDACTED]@fccint.com) for hotelsdeluxe.net  
 [REDACTED]@fccint.com) for gulf-of-saint-tropez.org  
 and [REDACTED]@db56.com) for worldwideluxuryhotels.net, whose technical contact is [REDACTED]@fccint.com.

I would imagine that [REDACTED] owner of ahyoo.com is a pseudonym...?

Side note: It is amusing to note that [REDACTED] ( [REDACTED]'s English for [REDACTED] in French) is the name of the person who reserved domain names, then sold them, including Ronaldbiggs.com to the well-known train robber. See:

<http://www.swns.com/vaults/biggs.htm>

[REDACTED] surely a coincidence (!) ran BuyThisDomainName and his address was or is [REDACTED] Woking, Surrey GU21 1NY, U.K.

He is accused of being a cyber squatter, but denies it!

<http://www.whoisfinder.com/news/200003/great-domain-robbery.html>

DOMAIN NAME	OWNER ACCORDING TO WHOSIS	IP INFO
france-hotel.org.uk	[REDACTED] elected to omit address from Whosis	66.160.181.17 Hurricane Electric HURRICANE-7 (NET-66-160-128-0-1) 66.160.128.0 - 66.160.207.255 Argon Blue HURRICANE-CE0923-523 (NET-66-160-181-0-1) 66.160.181.0 - 66.160.181.255
la-cote-dazur.com	[REDACTED] [REDACTED]@fccint.com) Nice NA,06200 FR Tel. [REDACTED]	66.160.147.7 Hurricane Electric HURRICANE-7 (NET-66-160-128-0-1) 66.160.128.0 - 66.160.207.255 Argon Blue HURRICANE-CE0923-4619 (NET-66-160-147-0-1) 66.160.147.0 - 66.160.147.127
francebooking.net	[REDACTED] [REDACTED]@fccint.com) Nice, 06200	66.160.181.160 Hurricane Electric HURRICANE-7 (NET-66-160-128-0-1) 66.160.128.0 - 66.160.207.255 Argon Blue HURRICANE-CE0923-523 (NET-66-160-181-

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hotelsdeluxe.net	FR [REDACTED] [REDACTED]@fccint.com) Nice, NONE 06100 FR	0-1) 66.160.181.0 - 66.160.181.255 66.160.147.20 Record Type: Hurricane Electric HURRICANE-7 (NET-66-160-128-0-1) 66.160.128.0 - 66.160.207.255 Argon Blue HURRICANE-CE0923-4619 (NET-66-160-147-0-1) 66.160.147.0 - 66.160.147.127
gulf-of-saint-tropez.org	[REDACTED] Ste Maxime, 83120, FR [REDACTED] Registrant Email: [REDACTED] [REDACTED]@fccint.com Tech Phone: [REDACTED] Tech Email: [REDACTED]@fccint.com	64.62.251.45 Hurricane
Besthotelsintheworld.com		Hurricane 66.160.147.108
ahyoo.com	[REDACTED] ([REDACTED]@caribbean-connection.com) [REDACTED] GHARB, Gharb, MT 00 356 21 659 325 Administrative, Billing Contact: FCC International Inc. [REDACTED]@fccint.com) Billing Contact: [REDACTED]@fccint.com) [REDACTED], Nice, 06200 FR,	69.59.140.24 OrgName: ServePath, LLC OrgID: SERVEP 650 Townsend Street, Suite 252, San Francisco, CA, 94103, US ReferralServer: rwhois://rwhois.servepath.com:4321 http://www.servepath.com/
SecureBooking.com	[REDACTED]@fccint.com) [REDACTED] Nice, 06200 FR,	69.59.140.24 OrgName: ServePath, LLC OrgID: SERVEP
usabooking.net	[REDACTED]@fccint.com) [REDACTED] Nice, 06200 FR,	OrgName: ServePath, LLC OrgID: SERVEP
loladelsol.com	Registrant: [REDACTED]@fccint.com) [REDACTED] Nice, 06200 FR,	66.160.147.10 Hurricane Electric HURRICANE-7 (NET-66-160-128-0-1) 66.160.128.0 - 66.160.207.255 Argon Blue HURRICANE-CE0923-4619 (NET-66-160-147-0-1) 66.160.147.0 - 66.160.147.127
worldwideluxuryhotels.net	[REDACTED]@db56.com) L'escarene, NONE 06440, FR [REDACTED]	ServePath, Billing Contact: FCC International Inc. (technical@fccint.com)
www.db56.com	Registrant: [REDACTED]@fccint.com) [REDACTED] Nice, 06200, FR	ServePath

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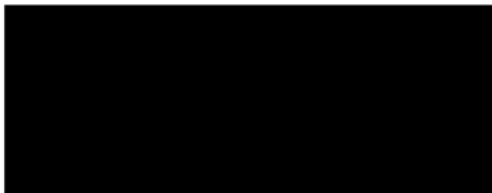
**5. I have a good faith belief that use of the copyrighted materials described above on the allegedly infringing web pages is not authorized by the copyright owner or the law because I and my husband, Russ Collins are the owners. We have not licensed our text or photos to any other web site.**

The infringing sites are:

francebooking.net  
france-hotel.org.uk  
gulf-of-saint-tropez.org  
hotelsdeluxe.net  
la-cote-dazur.com  
1french-riviera.com

The other sites listed are part of the interlinked system of sites, providing booking services and search facilities on the infringing and other sites.

**6. I swear, under penalty of perjury, that the information in the notification is accurate and that I am the copyright owner along with my husband Russell Collins and am therefore authorized to act on behalf of our exclusive right that is allegedly infringed.**



I am the marketing person for ProvenceBeyond.com and Beyond.fr (same physical web site.) My husband, [REDACTED] and I own the site and produce all the content personally.

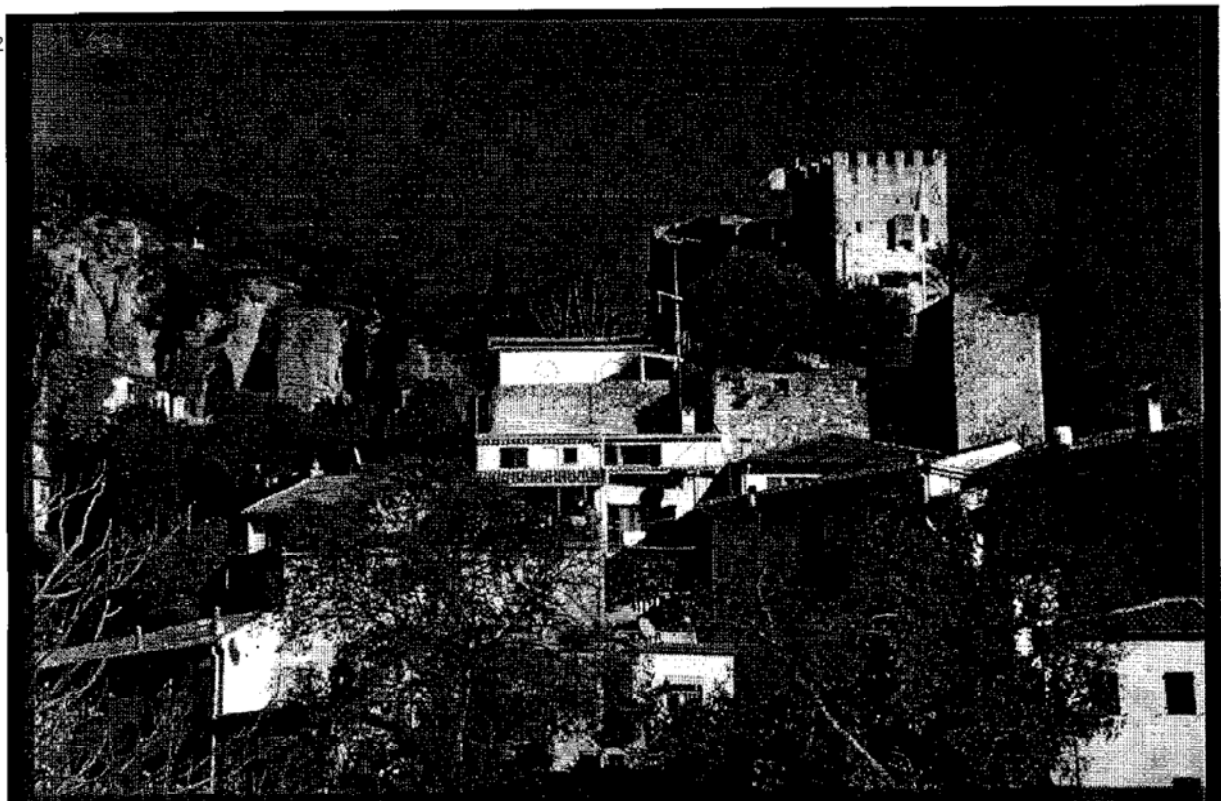
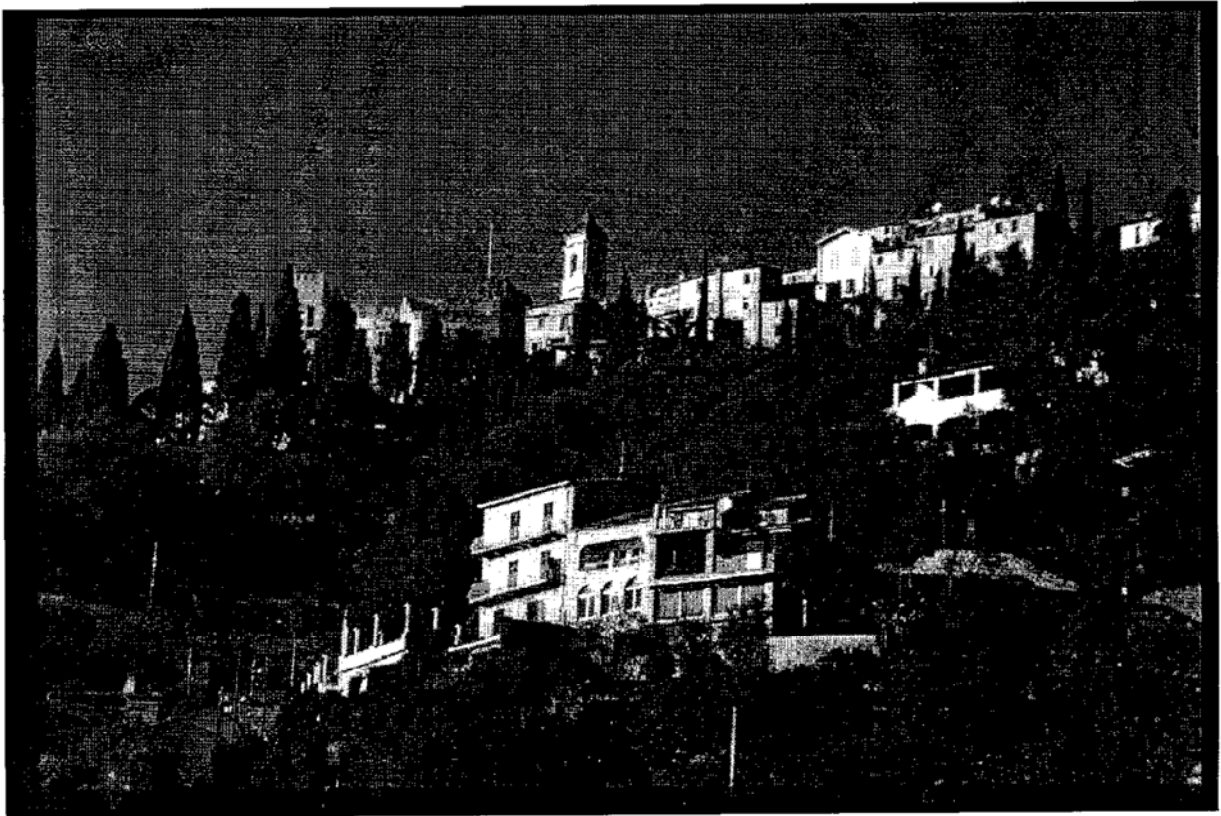
My telephone is intl +[REDACTED]  
(Please do not use my fax, which is not always connected.)

My email is [REDACTED]@netjmc.com

Date: 13 July 2005

RoquebruneCapM 1722cd

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StTropez ff

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stjeancapferrat

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1. stjeancf0091

