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March 29, 2017

**Via Email (info @ paolo-cirio.com)
Confirmation by Regular Mail**

Mr. Paolo Cirio
Suite 36,
88-90 Hatton Garden
City of London, EC1N 8PG

Re: Your False Advertising and Infringement of Mugshots.com's Intellectual Property

Dear Mr. Cirio:

This law firm represents the owner of Mugshots.com. We are writing regarding a serious matter that requires your immediate attention.

We understand that you are the owner and operator of the website <http://mug-shots.us/> (the "Infringing Website"). The Infringing Website consists almost entirely of information that was scraped and cloned from our client's mugshots.com website. Apparently this was done as part of something called "Project Obscurity" that you claim you created as some kind of protest of the online mugshots publishing industry in the United States.

According to the Project Obscurity website (<https://obscurity.online>):

Briefly about the Obscurity project

The project Obscurity targets mug-shot websites by cloning them and scrambling their data to obfuscate the information on tens of millions of individuals who have been incarcerated in the U.S. The names, last names, and mug-shots are shuffled and the photos blurred to make the individuals listed unrecognizable, while the age, race, gender, location, and charges are kept accurate in order to provide social context on the arrests.

How It Was Done

This artwork is made with millions of mug-shots, obtained through a screen-scraping software, from websites such as Mugshots.com,

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Using.com, Justmugshots.com, MugshotsOnline.com, etc. This project has cloned these mug-shot websites using similar domain-names and then shuffled the data associated with the individuals listed to obfuscate their identities.

The fact that you characterize the Infringing Website as “artwork” does not give you license to infringe our client’s intellectual property rights. Moreover, the Infringing Website falsely states that it is “Owned and Operated by: Julkisuudessa, Nevis, West Indies” when it is not. This constitutes false advertising under both U.S. and U.K. law.

Please be advised that your conduct is legally actionable both under United States and United Kingdom law. Demand is therefore made that you take down the Infringing Website **by no later than April 14, 2016**. If this demand is not complied with, our client may, with no further notice or warning to you, file a lawsuit against you either in the United States District Court for the Southern District of Florida or in the United Kingdom seeking injunctive relief, actual and/or statutory damages, and recovery of its attorneys’ fees.

We look forward to your prompt response.

Very truly yours,

DICKINSON WRIGHT PLLC



For the Firm

