

Dear Mr. Fine:

We are counsel for Hasbro, Inc. (“Hasbro”), the owner of the copyrights and trademarks for the famous G.I. JOE® toys, characters and related merchandise. We write concerning your unauthorized use of the G.I. JOE® trademarks, action figures and characters in the short films entitled “G.I. Joe: The Epic Saga” that are available through your website, www.ravenstake.com. In addition, a modified G.I. JOE® COBRA® logo is prominently displayed on the home page of your website, and provides access to the films. We are particularly concerned about the association of Hasbro’s G.I. JOE® property with your films due to their often inappropriate and offensive nature.

Your unauthorized use of the G.I. JOE® trademarks, including the COBRA® and G.I. JOE® logos, violates the federal trademark laws, including 15 U.S.C. §§ 1114(1) and 1125(a), by creating a likelihood of confusion with respect to Hasbro’s authorization or sponsorship of or association with your commercial activities. Even if confusion were not likely, your unauthorized use of these marks is likely to dilute their distinctive qualities in violation of 15 U.S.C. §1125(c) and the anti-dilution statutes of numerous states by tarnishing the affirmative associations the G.I. JOE® trademarks have come to convey. In addition to trademark violations, the films you have posted violate United States copyright laws, including 17 U.S.C. § 501, to the extent it is derived from G.I. JOE® characters and uses copyrighted G.I. JOE® action figures.

We therefore demand that you immediately cease and desist from any further use of the G.I. JOE® trademarks or characters, and remove the COBRA® logo and the “G.I. JOE: The Epic Saga” films from your website.

Please confirm to me in writing as soon as possible, and in any event within ten (10) days, your agreement to the above request. This letter does not purport to be a complete statement of the facts or the law and is without prejudice to Hasbro’s legal and equitable rights.

Sincerely yours,
(law firm omitted)