



October 14, 2014

***Via Electronic Mail  
and US Mail***

GoDaddy.com  
8977 Complex Drive, Suite B  
San Diego, California 92123  
[hostmaster@n2.net](mailto:hostmaster@n2.net)

Dear Mr. \_\_\_\_\_ and Representative at GoDaddy.com:

**Trademark Infringement: BorderFieldStatePark.com**

I am an attorney with the California Department of Parks & Recreation (“CDPR”) and represent the CDPR in intellectual property matters. You are making unauthorized use of CDPR’s trademark through the domain name [www.BorderFieldStatePark.com](http://www.BorderFieldStatePark.com), and through information disseminated on that site. As you should be aware, CDPR owns the trademark Border Field State Park,<sup>1</sup> operates a state park by that name, offers recreational services in connection with the trademark, and maintains a gift shop within the park. Numerous items that incorporate the trademark are sold in the Tijuana Estuary Visitor Center. The trademark has been in use by CDPR and its predecessor since at least 2001. CDPR’s trademarks symbolize valuable goodwill, and CDPR considers the infringing use of these trademarks to be a very serious matter. You have no authorization to use CDPR trademarks, and by using this trademark, you are violating the Trademark Act of 1946, also known as the Lanham Act.

Your continued use of CDPR’s intellectual property, including the registration of the domain name BorderFieldStatePark.com, is likely to cause confusion, mistake, or to deceive, and to dilute the distinctive quality of CDPR’s mark, thereby infringing CDPR’s rights under federal and state law. CDPR has already received complaints from members of the public who have been misled by the inaccurate information on your web site and your representations that you are related to and/or have an authorized relationship with CDPR and Border Field State Park.

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<sup>1</sup> Certificate of Registration No. 69322 for registration of Border Field State Park as a service mark.

CDPR demands that you immediately cease and desist from any and all use of CDPR trademarks, including the use of the domain name BorderFieldStatePark.com, or any other mark or domain name that includes Border Field in conjunction with State Park or which is confusingly similar to a CDPR mark. In connection therewith, CDPR demands that you immediately transfer the domain name BorderFieldStatePark.com to CDPR.

**Notice of Violation of the Anticybersquatting Consumer Protection Act (ACPA)**

As the registrant of BorderFieldStatePark.com, you have violated the ACPA by attempting to profit from the use of CDPR's trademark. (15 U.S.C. § 1125 (d).) We believe you have in bad faith attempted to profit from our distinctive mark, creating a domain name that is identical or confusingly similar to the one owned by CDPR. In using copyright material on this site, you are further confusing the public.

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

I look forward to your written confirmation within ten (10) business days that you will comply with the demands set forth in this letter. CDPR views this matter seriously and will take all steps necessary to protect its rights, including the pursuit of all available injunctive and monetary relief, including attorneys' fees.

Sincerely,



Laura A. Reimche  
Senior Staff Counsel