Harrison Greenbaum  
Harrison@harrisongreenbaum.com  

January 3, 2022  

Re: Infringement of Criss Angel Intellectual Property Rights  

Dear Mr. Greenbaum:  

We are counsel to Criss Angel and his companies, including that which owns the CABLP Restaurant. In a social media posting you have publicly admitted that you intentionally are infringing our clients’ trademarks and copyrights and are violating the Internet Corporation for Assigned Names and Numbers (ICANN) policies with which you and your domain name Registrar must comply.  

Specifically, you admit that you illegally registered cablprestaurant.com as your domain name:  

Criss Angel opened a restaurant this year called Cablp and forgot to register CablpRestaurant.com. I know this because, yesterday, I became the proud owner of CablpRestaurant.com. 

An image of that posting is attached.  

You further admitted to setting up on your website a menu that is substantially similar to the actual CABLP menu. An image of that infringing menu on your website is attached.  

This is to demand that you immediately cease and desist from your unauthorized use of our clients’ name and trademarks in or as a domain name, on your website and in social media, and that you cease publicly displaying the copyright infringing menu.
Further, we demand that you assign the illegally registered domain name to our clients as we direct.

As you well know, Criss Angel is a world famous performer, magician and producer and by your actions you illegally seek to capitalize upon his name and fame. Your deliberate misuse of our clients’ name and trademarks, and public distribution and display of copyright infringing works, comprises infringement of our clients’ statutory and common law trademark rights, false designation of origin and false advertising, and copyright infringement, all in violation of state and federal law, including but not limited to the Lanham Act § 43(a) and the Copyright Act.

If you have not responded and complied by 5 pm Tuesday, January 4, 2022, we will proceed with the filing of formal complaints with WIPO and/or the National Arbitration Forum to seize the domain name, and in federal court to pursue appropriate injunctive and monetary relief.

This letter is not an exhaustive recitation of all of the facts or issues in this matter, and it is written without prejudice to any of our clients’ rights or remedies, all of which are expressly reserved.

Sincerely,

[Signature]

Thomas Carulli