SHAHROKH SHEIK (CA Bar ID #250650)
shahrokh@weinberg-gonser.com
CHARANJIT SINGH (CA Bar ID #311609)
charanjit@weinberg-gonser.com
WEINBERG GONSER LLP
10866 Wilshire Blvd., Suite 1650
Los Angeles, CA 90024
Telephone: (424) 239-2851
Facsimile: (424) 238-3060

Attorneys for Plaintiff,
DESIROUS PARTIES UNLIMITED, INC

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

DESIROUS PARTIES UNLIMITED, INC., a Texas corporation,

Plaintiff,

v.

RIGHT CONNECTION, INC., a Nevada corporation; and DON HUGHES, an individual,

Defendants.

Case No.:

COMPLAINT FOR DAMAGES

1. **TRADEMARK INFRINGEMENT – 15 U.S.C. § 1114**
2. **COMMON LAW TRADEMARK INFRINGEMENT**
3. **COPYRIGHT INGRINGEMENT – 17 U.S.C. § 501**
4. **UNFAIR COMPETITION – 15 U.S.C. § 1125(a)**
5. **BREACH OF CONTRACT**
6. **INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE**
7. **DECLARATORY RELIEF**
8. **INJUNCTIVE RELIEF**

DEMAND FOR JURY TRIAL

Plaintiff Desirous Parties Unlimited, Inc., ("Plaintiff"), by and through its attorneys, brings this action and alleges against Defendants Right Connection, Inc. ("RCT") and Don Hughes ("Hughes") (RCT and Hughes collectively referred to as "Defendants") as follows:

NATURE OF THE ACTION

1. This is an action seeking damages for trademark infringement, copyright infringement, breach of contract, and declaratory relief arising out of a former partnership and use

of Plaintiff's trademarks and copyrights without consent and infringement of Plaintiff's trademark and copyrights.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over this matter pursuant to the Lanham Act, 15 U.S.C. § 1121, 17 U.S.C. § 501 and the Declaratory Judgment Act, 28 U.S.C. §2201, *et seq.*, and 28 U.S.C. §§1331, 1332 and 1338.

3. This Court has personal jurisdiction over Defendant Hughes because Hughes resides and is domiciled in the State of Arizona.

4. This Court has personal jurisdiction over Defendant RCT because RCT is owned and operated by Hughes from his domicile in the state of Arizona. Hughes is the owner, director, and an officer of RCT at all relevant times herein. (Exhibit A – Nevada Secretary of State Entity Information). Upon information and belief, Hughes directs and controls RCT and handles most of its day-to-day operations from the state of Arizona. Upon information and belief, Hughes has served as president of RCT in the past and currently serves as RCT's operations manager. Hughes represented himself as the owner of RCT in his dealings with Plaintiff and informed Plaintiff he lives in Arizona and conducts all of RCT's business from his home in Arizona. As such, RCT's principal place of business and nerve center is rightfully in Arizona. Further, upon information and belief, Defendant RCT has intentionally, systematically, and continuously engaged in ongoing business transactions, sales and marketing activities throughout Arizona. RCT regularly targets Arizona residents with solicitation of RCT's services and sells its services to Arizona residents. Hughes will serve as the principal party and witness for RCT as its officer, director, and owner. Hughes is domiciled in Arizona as alleged above. Thus, it will not offend the notion of fair play or the interests of justice for this Court to exercise personal jurisdiction over RCT and Arizona will be most convenient for Hughes.

5. Venue is proper in this judicial district because Defendant is subject to the Court's personal jurisdiction pursuant to 28 U.S.C. §1391(b) and 1400(a).

//

THE PARTIES

6. Plaintiff is a Texas corporation and with its principal place of business in Houston, Texas.

7. Upon information and belief, Defendant RCT is a Nevada corporation with its principal place of business in Arizona, and conducts business nationwide, including throughout Arizona.

8. Defendant Don Hughes is the owner of Defendant RCT. On information and belief, Hughes resides in Arizona. Don Hughes operates RCT and also engages in business individually throughout Arizona.

9. At all times relevant herein there was such a unity of interest and ownership that Defendant RCT and Defendant Hughes are inseparable from the other and Defendant RCT is influenced and governed by Defendant Hughes for his own personal interest and to suit his convenience. Specifically, at all times relevant hereto, Defendant Hughes:

a. Is the owner, director, and officer of RCT, a small corporation;
b. Upon information and belief, controls the business and affairs of Defendant RCT;
c. Upon information and belief, has served as the president of Defendant RCT until stepping down to secretary, but still exercises substantial, if not total, control over RCT operations;
d. Upon information and belief, conducts all of RCT's business from his home in Arizona and RCT's "nerve center" and actual place of business is the same as Hughes' home in Arizona;
e. Upon information and belief, uses the same employees for himself and Defendant RCT;
f. Has indicated to Plaintiff multiple times that should any judgment be rendered against RCT, he will file for bankruptcy and simply start a new company to essentially do the same business;
g. Upon information and belief, comingled Defendant RCT's funds with his own;

h. Upon information and belief, treats corporate assets as his own;

i. Upon information and belief, failed to observe corporate formalities.

10. There is such unity and ownership between Defendant Hughes and RCT that Defendant RCT ceases to exist, and the facts show that adherence to the fiction of the separate existence of RCT will sanction fraud and promote injustice.

FACTS COMMON TO ALL ALLEGATIONS

11. Plaintiff specializes in organizing, conducting, and arranging adult oriented entertainment events, including without limitation, nightclub events and destination travel packages (collectively, the "Services"). Plaintiff has developed a strong reputation in connection with the Services.

Plaintiff's Trademark and Copyrights

12. Plaintiff is the owner of the United States federal trademark registration number 6068727 for the trademark DIRTY VIBES issued on June 2, 2020 (the "Registered Mark"). The Registered Mark covers the following services: (1) International Class 039: Arranging of cruises; Coordinating travel arrangements for individuals and for groups; Organization of travel; Organization of travel and boat trips; Providing a website featuring information on travel; Providing links to web sites of others featuring travel, and (2) International Class 041: Arranging and conducting nightclub entertainment events; Arranging and conducting nightclub parties; Arranging and conducting special events for social entertainment purposes; Arranging, organizing, conducting, and hosting social entertainment events; Entertainment services in the nature of hosting social entertainment events; Hosting social entertainment events, namely, adult lifestyle parties, for others; Entertainment services in the nature of arranging social entertainment events.

13. Plaintiff first started using the Registered Mark in commerce as early as November 2017.

14. Plaintiff has used the Registered Mark in connection with the Services continuously since November 2017.

15. In addition to securing the Registered Mark, Plaintiff also purchased the domain

name dirtyvibes.com and created, controls, and manages the Dirty Vibes website located at www.dirtyvibes.com ("Website") and related social media accounts (collectively referred to hereafter along with the Website and Registered Mark, the "DV Brand(s)").

16. Plaintiff developed and created two special trips events under the DV Brands: Tryst and Wicked Eden. In connection with the two special events, Plaintiff created and began using the marks "TRYST" and "WICKED EDEN" in commerce with the two corresponding events throughout the United States ("Affiliated Marks"). Plaintiff has filed applications to register the Affiliated Marks. Plaintiff currently owns all common law rights to each of the Affiliated Marks.

17. Plaintiff also holds all right of use of certain copyrights. Plaintiff owns rights to the registered United States Copyrights for the group of photographs published on the Website under the Registration number VAu001426732, effective date of April 6, 2021, known as "2019 Music Fest" attached as Exhibit B.

18. Plaintiff also owns all rights to the registered United States Copyrights for the group of photographs published on the Website under the Registration number VAu001426692, effective date of April 6, 2021 known as "2018 Music Fest" attached Exhibit C.

19. Plaintiff also owns all rights to the registered United States Copyrights for the "About" section on the Website ("Content") under the Registration number TXu002269217, effective date of April 6, 2021 attached as Exhibit D. (Plaintiff's copyrights of 2019 Music Fest, 2018 Music Fest, and Content to be collectively referred to hereafter as the "Registered Copyrights")

20. Plaintiff created the Website to provide information about the DV Brands, Affiliated Marks, and related events. Plaintiff bought the domain name, dirtyvibes.com, and paid all the associated fees and costs with setting up the website. Plaintiff created and authored all aspects of the Website including without limitation writing the informational "About" section on how DV Brands came to be and what it is about. Additionally, Plaintiff routinely takes photographs of prior events and publishes those photographs on the Website as well as the DV Brands social media to showcase prior events as advertisements for future events. Plaintiff has published a group of

photographs on Plaintiff's Website for its 2019 Dirty Vibes Music Fest and TRYST Temptation Tower Takeover ("2019 Music Fest") and 2018 Dirty Vibes Music Fest and TRYST Temptation Tower Takeover ("2018 Music Fest") with the logo for DV Brands on each photograph.

Agreement with Defendants and Defendants' Subsequent Misconduct

21. In or about 2017, Matlock and Hughes met and discussed their respective businesses. Hughes represented to Matlock that he owned and was president of RCT, a travel agency. Hughes stated that he could offer booking services for hotels for Plaintiff at discounted rates.

22. Toward the end of 2017, Plaintiff and Defendants orally agreed to organize certain destination travel events ("Travel Events") promoted by Plaintiff under its Desirous Party brand and/or DV Brands and splitting the profits fifty percent to Plaintiff and fifty percent to Defendants ("Agreement").

23. Plaintiff created the DV Brands as a separate and distinct brand to market and promote its events, including without limitation certain Travel Events under the Agreement. Plaintiff came up with the concept and name of *Dirty Vibes* and financed and created the DV Brand as proprietary intellectual property. While Plaintiff allowed the DV Brands to be used in the Travel Events, Plaintiff always intended the DV Brands to be solely and exclusively owned by Plaintiff.

24. Since 2017, Plaintiff organized seven (7) Travel Events under the Agreement:

a. April 2018 – Wild on Spring Break
b. August 2018 – Dirty Vibes Music Fest
c. April 2019 – Wild on Dirty Vibes
d. August 2019 – Dirty Vibes Music Fest
e. February 2020 – Dirty Vibes Temptation Cruise
f. October 2020 – Dirty Vibes Temptation
g. April 2021- Tryst 2021 Temptation

25. Plaintiff believes Defendants failed to properly and fully account to Plaintiff, and they knowingly underpaid Plaintiff for Plaintiff's share of proceeds in connection with the first five (5) Travel Events under the Agreement. Plaintiff also believes Defendants intentionally

concealed material financial information and misrepresented material information in connection with the accounting and payments of the first five Travel Events. Despite numerous requests for information related to the finance and accounting of these events, Defendants have failed to provide reasonable and detailed financial information.

26. Defendants have also entirely failed to account and pay Plaintiff its share of proceeds for the October 2020 event and April 2021 event.

27. When Hughes learned Plaintiff secured the Registered Mark, he unjustly demanded Plaintiff turnover rights to the Mark to Defendants, threatened to withhold payments for the October 2020 event and to shut Plaintiff out of the April 2021 event after Plaintiff spent considerable time to setup and market the April 2021 event. Through Plaintiff's efforts, over 200 hotel rooms had been booked for the April 2021 event. Plaintiff refused to turn over the DV Brand to Defendants, Defendants followed through on the aforementioned threats.

28. Consequently, Plaintiff terminated the relationship with Defendants and demanded Defendants to cease and desist from any future use of the Registered Mark, and for all accounting and payment of monies unjustly held by Defendants under the Agreement. Plaintiff also made clear the Registered Mark was created by Plaintiff and Plaintiff was the rightful owner, not Defendants. Defendants did not have Plaintiff's permission to use the Registered Mark.

29. However, Defendants continued to use the Registered Marks and Affiliated Marks to promote their own competing events without Plaintiff's consent or involvement and in clear violation of Plaintiff's rights. In fact, Defendants created a competing fake website- "dirty-vibes.com." Defendants also set up several fake social media accounts directly and expressly infringing on the DV Brand.

30. On the fake website, Defendants copied and pasted the Registered Copyrights and the Registered Marks to promote their own travel events to the exclusion of Plaintiff and Matlock. Defendants also stole and doctored the photographs and other videos to remove the DV logos and publish them as their own on the fake website. Defendants also use content on their website that is very similar to the materials and information found on Plaintiff's site. Essentially, Defendants'

fake website replicates Plaintiff's Website and copies and pastes large sections of content without consent or authorization.

31. Defendants have improperly and intentionally copied Plaintiff's copyrights without consent to counterfeit Plaintiff's brand.

32. Defendants allege they created the Dirty Vibes brand and continue to use the Registered Mark and Affiliated Marks without authorization. They fraudulently applied for similar trademarks, namely USPTO applications under Serial Nos. 90442106 filed on December 31, 2020, and 90433201 and 90433009 filed on December 30, 2020 (collectively, "Defendants' Applied for Marks").

33. Recently, Defendants sent cease and desist letters to Plaintiff's IP host sites and asked that they take down or remove Plaintiff's Websites and social media accounts on the basis of copyright infringement for Plaintiff's use of their own logo. Defendants are wrongfully trying to prove that they have rights to Plaintiff's copyrights and to put ownership of such rights in dispute with these fake take down letters. Defendants also seek to disrupt Plaintiff's ability to post and market its events on these sites so it can harm Plaintiff's economic opportunities.

34. Defendants have also interfered with Plaintiff's business and economic opportunities. Plaintiff has been informed that Defendants have approached Plaintiff's clients and made disparaging and defamatory comments about Plaintiff and its owner in order to harm Plaintiff, its reputation, and steal clients. Defendants have tried to steal these clients and customers away from Plaintiff and break their contracts and prospective contracts with Plaintiff. Defendants have approached many of the hotel owners, DJs, vendors, and others that Plaintiff works with and uses to set up events it hosts and asked that these third parties stop working with Plaintiff and cancel their agreements with Plaintiff. Defendants has urged these third parties to work with them instead of Plaintiff. These attempts to disrupt and break Plaintiff's contractual relationships make clear that Defendants will not stop until Plaintiff's business has been ruined.

//

//

COUNT I

(Trademark Infringement – 15 U.S.C. § 1114)

(As to All Defendants)

35. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs above as though fully set forth herein.

36. Plaintiff owns the Registered Mark and has exclusive rights to use the Registered Mark and the associated DV Brands in commerce. Plaintiff has, through its own sweat and equity, created the DV Brands and the Registered Mark. Plaintiff used the Registered Mark since approximately November 28, 2017.

37. Defendants have, without Plaintiff's consent, used the Registered Mark in a manner that infringes on Plaintiff's rights, and such use will and has caused actual confusion, mistake, or deception in violation of 15 U.S.C. § 1114.

38. As a result of Defendant's infringement, Plaintiff has suffered damages, including irreparable injury to its brand, lost profits, reputation, and goodwill.

39. Plaintiff is entitled to monetary damages, including attorneys' fees, in an amount to proven at trial pursuant to 15 U.S.C. § 1117(a).

COUNT II

(Common Law Trademark Infringement)

(As to All Defendants)

40. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs above as though fully set forth herein.

41. Plaintiff owns the Affiliated Marks and has exclusive rights to use the Affiliated Marks and the associated DV Brands in commerce. Plaintiff has, through its own sweat and equity, created the DV Brands and the Affiliated Marks. Plaintiff has continuously used the Affiliated Marks since their inception in or about 2017.

42. Defendants have, without Plaintiff's consent, used the Affiliated Marks to promote their own competing events under the same trademarks in a manner that infringes on Plaintiff's

rights, and such use will and has caused actual confusion, mistake, or deception.

43. By using Plaintiff's Affiliated Marks in connection with services similar to Plaintiff's, Defendants are infringing on Plaintiff's Affiliated Marks.

44. As a result of Defendants' infringement, Defendants have unlawfully profited, and Plaintiff has suffered damages including irreparable injury to its brand, lost profits, reputation, and goodwill.

COUNT III

(Copyright Infringement – 17 U.S.C. § 501)

(As to All Defendants)

45. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs above as though fully set forth herein

46. At all times relevant hereto, Plaintiff has exclusive rights to use the Registered Copyrights including the 2019 Music Fest photographs, 2018 Music Fest photographs, and Content that appears on its Website.

47. Defendants, have without permission or consent, improperly copied, used, published, reproduced, and distributed Plaintiff's Registered Copyrights through their fake website.

48. As a result of the above-described conduct by Defendants, Plaintiff has been damaged in an amount to be proven at trial.

49. By reason of the copyright infringement described above, Plaintiff is entitled to recover Defendants' profits to the extent the same are not included as part of Plaintiff's damages.

50. In the alternative, at the election of Plaintiff, Plaintiff is entitled to recover from Defendants statutory damages per copyright infringement for Defendant's willful copyright infringement.

51. Plaintiff is entitled to attorneys' fees and costs, in an amount to proven at trial, pursuant to 17 U.S.C. § 505.

52. Plaintiff additionally seeks injunctive relief against Defendants to immediately cease use of Plaintiff's copyrights as identified above and remove from all websites, social media

accounts, and other accounts associated Plaintiff's copyrights pursuant to 17 U.S.C. § 502.

COUNT IV

(Unfair Competition – 15 U.S.C. § 1125(a))

(As to All Defendants)

53. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs above as though fully set forth herein.

54. Defendants' use of the Registered Mark, Affiliated Marks, and Registered Copyrights has caused confusion, mistake, and deception, and will continue to do so as to the affiliation, connection, or association of Defendants with Plaintiff, or as to the origin, sponsorship, or approval of Plaintiff's brand in violation of 15 U.S.C. § 1125(a).

55. Defendants' commercial advertising and promotion of its events using the Registered Mark, Affiliated Marks, and Registered Copyrights misrepresents the nature, characteristics, qualities, or geographic origin of Defendants' goods and services in violation of 15 U.S.C. § 1125(a).

56. Defendants have realized profits as a result of their unlawful actions, and Plaintiff has and will continue to suffer damages, including to its reputation and goodwill.

57. Plaintiff is entitled to monetary damages, including attorneys' fees, in an amount to proven at trial pursuant to 15 U.S.C. § 1117(a).

COUNT V

(Breach of Contract)

(As to All Defendants)

58. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs above as though fully set forth herein.

59. Plaintiff and Defendants entered into the Agreement.

60. Plaintiff performed all, or substantially all, of its obligations under the Agreement.

61. Defendants breached their obligations under the Agreement by among other things failing to properly account for and pay Plaintiff's share of proceeds for the Travel Events under

the Agreement, and for shutting Plaintiff out of the April 2021 event and refusing to share profits for the April 2021 event.

62. As a result of the Defendants' breach, Plaintiff has been damaged in an amount to be proven at trial.

COUNT VI

(Intentional Interference with Prospective Economic Advantage)

(As to All Defendants)

63. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs above as though fully set forth herein.

64. Plaintiff has done extensive marketing and enjoys a strong reputation in connection with entertainment events. Plaintiff maintains business relationships and agreements with a network of clientele. Plaintiff has substantial prospective business opportunities thereto including the promotion of its Services to such clientele.

65. Plaintiff maintains business relationships and agreements with a network of hotel owners, DJs, and other vendors to use for its events. Plaintiff has a long history with many of the hotel owners, DJs, and other vendors.

66. Defendants know of Plaintiff's relationships and agreements with its network of clientele, hotel owners, DJs, and vendors. Defendants have intentionally and relentlessly engaged on activities to interfere with and disrupt Plaintiff's relationship with clients and future clients as well as hotel owners, DJs, and vendors.

67. Defendants have acted to steal Plaintiff's clients, and Plaintiff has lost clients and prospective business opportunities due to Defendant's wrongful conduct.

68. Defendants have asked hotel owners, DJs, and other vendors to violate their agreements with Plaintiff for Plaintiff's events and instead work with Defendants.

69. In addition, Defendant has tried to remove and deactivate Plaintiff's Website and social media accounts to disrupt its working relationship with clients and hotel owners based on fake copyright disputes.

70. Defendant is intentionally, knowingly, and actively trying to interfere with Plaintiff's prospective economic opportunities.

71. As a direct and proximate result, Plaintiff has suffered great economic harm and continues to suffer great harm.

COUNT VII

(Declaratory Relief)

(As to All Defendants)

72. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs above as though fully set forth herein.

73. Defendants have infringed upon Plaintiff's trademark rights and copyrights as described above. Defendants even allege they have a right to use the Registered Mark. As such an actual and justiciable controversy has arisen and now exists between Plaintiff and Defendant.

74. By this Complaint, Plaintiff seeks a declaratory judgment pursuant to 28 U.S.C. § 2201(a) that (i) Plaintiff has all rights to the Registered Mark, (ii) Defendants have violated Plaintiff's rights to the Registered Mark, (iii) the Defendants' Applied for Marks are confusingly similar to the Registered Mark and should therefore be denied certification.

75. Plaintiff seeks a declaratory judgment that Plaintiff is the rightful exclusive owner of the Registered Copyrights. Thus, Plaintiff is free to use its registered copyrights without any infringement.

76. Plaintiff is entitled to a declaratory judgment of its rights under 28 U.S.C. §2201 in order to resolve the dispute existing between the parties and afford relief from the uncertainty and harm that Defendant's allegations and actions have caused.

COUNT VIII

(Injunctive Relief)

(As to All Defendants)

77. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs above as though fully set forth herein.

78. Defendants continues to violate and infringe upon Plaintiff's Registered Mark by using the Registered Mark to promote their own events and such use will and has caused actual confusion, mistake, or deception in violation of 15 U.S.C. § 1114.

79. Defendants continue to infringe upon Plaintiff's Registered Copyrights.

80. As a direct and proximate result of Defendants' misconduct, Plaintiff has and continues to suffer damages. As such, Plaintiff requests this Court for a preliminary and permanent injunction to enjoin Defendant from further use of the Registered Mark and Registered Copyrights.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that the Court:

1. Award actual damages suffered by Plaintiff according to proof at trial pursuant to 15 U.S.C. § 1117(a);
2. Award actual damages suffered by Plaintiff according to proof at trial pursuant to 17 U.S.C. § 504;
3. Award disgorgement of profits from Defendants pursuant to 15 U.S.C. § 1117(a);
4. Award disgorgement of profits from Defendants pursuant to 17 U.S.C. § 504;
5. Grant Plaintiff a monetary award to account for Defendants unlawful conduct;
6. For declaratory judgment that 727 Registration is Plaintiff's exclusive trademark;
7. For declaratory relief that Plaintiff is the exclusive owner of its registered copyrights;
8. Injunctive relief;
9. Attorneys' fees as applicable pursuant to 17 U.S.C. § 505 and 15 U.S.C. § 1117(a);
10. Pre- and Post-judgment interest;
11. Any other relief as the Court deems just and equitable.

//

//

DATED: August 10, 2021

By: */s/ Shahrokh Sheik*

SHAHROKH SHEIK
CHARANJIT SINGH
WEINBERG GONSER LLP
10866 Wilshire Blvd., Suite 1650
Los Angeles, CA 90024
Telephone: (424) 239-2851
Facsimile: (424) 238-3060

Attorneys for Plaintiff,
DESIROUS PARTIES UNLIMITED, INC.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

DATED: August 10, 2021

By: */s/ Shahrokh Sheik*

SHAHROKH SHEIK
CHARANJIT SINGH
WEINBERG GONSER LLP
10866 Wilshire Blvd., Suite 1650
Los Angeles, CA 90024
Telephone: (424) 239-2851
Facsimile: (424) 238-3060

Attorneys for Plaintiff,
DESIROUS PARTIES UNLIMITED, INC.

EXHIBIT A

SilverFlume
NEVADA'S BUSINESS PORTAL

BUSINESSINFORMATION

ENTITY INFORMATION

ENTITY INFORMATION

Entity Name:	RIGHT CONNECTION INC.	**Entity Number:**	C10955-2001
Entity Type:	Domestic Corporation (78)	**Entity Status:**	Active
Formation Date:	04/27/2001	**NV Business ID:**	NV20011286094
Termination Date:	Perpetual	**Annual Report Due Date:**	4/30/2022

REGISTERED AGENT INFORMATION

Name of Individual or Legal Entity:	STEVEN R. FLACKS	**Status:**	Active
CRA Agent Entity Type:		**Registered Agent Type:**	Non-Commercial Registered Agent
NV Business ID:		**Office or Position:**	
Jurisdiction:			
Street Address:	2375 EAST TROPICANA #3, LAS VEGAS, NV, 89119, USA		
Mailing Address:			
Individual with Authority to Act:			
Fictitious Website or Domain Name:			

OFFICER INFORMATION

☐ VIEW HISTORICAL DATA

Title	Name	Address	Last Updated	Status
President	JAMES A TERHUNE	7437 SO EASTERN AVE #230, LAS VEGAS, NV, 89123, USA	04/29/2019	Active
Secretary	DONALD D HUGHES II	1850 MCCULLOCH BLVD, STE C1-272, LAKE HAVASU CITY, AZ, 86403, USA	04/29/2019	Active
Treasurer	JAMES A TERHUNE	7437 SO EASTERN #230, LAS VEGAS, NV, 89123, USA	04/29/2019	Active
Director	JAMES A TERHUNE	7437 SO EASTERN AVE #230, LAS VEGAS, NV, 89123, USA	04/29/2019	Active
Director	DONALD D HUGHES II	1850 MCCULLOCH BLVD, STE C1-272, LAKE HAVASU CITY, AZ, 86403, USA	04/29/2019	Active

Page 1 of 1, records 1 to 5 of 5

CURRENT SHARES

Class/Series	Type	Share Number	Value
No records to view.			

Number of No Par Value Shares: **25000**

Total Authorized Capital: **25,000**

Filing History | Name History | Mergers/Conversions

Return to Search | Return to Results

EXHIBIT B

The Library has opened access to some reading rooms by appointment only. More. The Jefferson Building has reopened to visitors via timed, ticketed entry. More.

Public Catalog

Copyright Catalog (1978 to present)
Search Request: Left Anchored Copyright Number = vau001426732
Search Results: Displaying 1 of 1 entries

Labeled View

2019 Music Fest and Temptation Tower Takeover Photographs.

Type of Work: Visual Material
Registration Number / Date: VAu001426732 / 2021-04-06
Application Title: 2019 Music Fest and Temptation Tower Takeover Photographs
Title: 2019 Music Fest and Temptation Tower Takeover Photographs. [Group registration of unpublished photographs. 158 photographs]
Description: 158 photographs : Electronic file (eService)
Copyright Claimant: David Matlock. Address: 9225 Katy Freeway, Suite 410, Houston, TX, 77024, United States.
Date of Creation: 2019
Authorship on Application: David Matlock; Citizenship: United States. Authorship: photographs.
Rights and Permissions: David Matlock, 9225 Katy Freeway, Suite 410, Houston, TX, 77024, United States
Copyright Note: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of unpublished photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) are unpublished AND (b) were created by the same author AND (c) are owned by the same copyright claimant AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title and file name for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Regarding group registration: Registration extends to corresponding photographs in contents titles and in deposit.

Photographs: (50 photographs): Dirty Vibes Music Fest 2019- Picture 1,Dirty Vibes Music Fest 2019- Picture 2,Dirty Vibes Music Fest 2019- Picture 3,Dirty Vibes Music Fest 2019- Picture 4,Dirty Vibes Music Fest 2019- Picture 5,Dirty Vibes Music Fest

2019- Picture 6,Dirty Vibes Music Fest 2019- Picture 7,Dirty Vibes Music Fest 2019- Picture 8,Dirty Vibes Music Fest 2019- Picture 9,Dirty Vibes Music Fest 2019- Picture 10,Dirty Vibes Music Fest 2019- Picture 11,Dirty Vibes Music Fest 2019- Picture 12,Dirty Vibes Music Fest 2019- Picture 13,Dirty Vibes Music Fest 2019- Picture 14,Dirty Vibes Music Fest 2019- Picture 15,Dirty Vibes Music Fest 2019- Picture 16,Dirty Vibes Music Fest 2019- Picture 17,Dirty Vibes Music Fest 2019- Picture 18,Dirty Vibes Music Fest 2019- Picture 19,Dirty Vibes Music Fest 2019- Picture 20,Dirty Vibes Music Fest 2019- Picture 21,Dirty Vibes Music Fest 2019- Picture 22,Dirty Vibes Music Fest 2019- Picture 23,Dirty Vibes Music Fest 2019- Picture 24,Dirty Vibes Music Fest 2019- Picture 25,Dirty Vibes Music Fest 2019- Picture 26,Dirty Vibes Music Fest 2019- Picture 27,Dirty Vibes Music Fest 2019- Picture 28,Dirty Vibes Music Fest 2019- Picture 29,Dirty Vibes Music Fest 2019- Picture 30,Dirty Vibes Music Fest 2019- Picture 31,Dirty Vibes Music Fest 2019- Picture 32,Dirty Vibes Music Fest 2019- Picture 33,Dirty Vibes Music Fest 2019- Picture 34,Dirty Vibes Music Fest 2019- Picture 35,Dirty Vibes Music Fest 2019- Picture 36,Dirty Vibes Music Fest 2019- Picture 37,Dirty Vibes Music Fest 2019- Picture 38,Dirty Vibes Music Fest 2019- Picture 39,Dirty Vibes Music Fest 2019- Picture 40,Dirty Vibes Music Fest 2019- Picture 41,Dirty Vibes Music Fest 2019- Picture 42,Dirty Vibes Music Fest 2019- Picture 43,Dirty Vibes Music Fest 2019- Picture 44,Dirty Vibes Music Fest 2019- Picture 45,Dirty Vibes Music Fest 2019- Picture 46,Dirty Vibes Music Fest 2019- Picture 47,Dirty Vibes Music Fest 2019- Picture 48,Dirty Vibes Music Fest 2019- Picture 49,Dirty Vibes Music Fest 2019- Picture 50

(49 photographs): Dirty Vibes Music Fest 2019- Picture 51,Dirty Vibes Music Fest 2019- Picture 52,Dirty Vibes Music Fest 2019- Picture 53,Dirty Vibes Music Fest 2019- Picture 54,Dirty Vibes Music Fest 2019- Picture 55,Dirty Vibes Music Fest 2019- Picture 56,Dirty Vibes Music Fest 2019- Picture 57,Dirty Vibes Music Fest 2019- Picture 58,Dirty Vibes Music Fest 2019- Picture 59,Dirty Vibes Music Fest 2019- Picture 60,Dirty Vibes Music Fest 2019- Picture 61,Dirty Vibes Music Fest 2019- Picture 62,Dirty Vibes Music Fest 2019- Picture 63,Dirty Vibes Music Fest 2019- Picture 64,Dirty Vibes Music Fest 2019- Picture 65,Dirty Vibes Music Fest 2019- Picture 66,Dirty Vibes Music Fest 2019- Picture 67,Dirty Vibes Music Fest 2019- Picture 68,Dirty Vibes Music Fest 2019- Picture 69,Dirty Vibes Music Fest 2019- Picture 70,Dirty Vibes Music Fest 2019- Picture 71,Dirty Vibes Music Fest 2019- Picture 72,Dirty Vibes Music Fest 2019- Picture 73,Dirty Vibes Music Fest 2019- Picture 74,Dirty Vibes Music Fest 2019- Picture 75,Dirty Vibes Music Fest 2019- Picture 76,Dirty Vibes Music Fest 2019- Picture 77,Dirty Vibes Music Fest 2019- Picture 78,Dirty Vibes Music Fest 2019- Picture 79,Dirty Vibes Music Fest 2019- Picture 80,Dirty Vibes Music Fest 2019- Picture 81,Dirty Vibes Music Fest 2019- Picture 82,Dirty Vibes Music Fest 2019- Picture 83,Dirty Vibes Music Fest 2019- Picture 84,Dirty Vibes Music Fest 2019- Picture 85,Dirty Vibes Music Fest 2019- Picture 86,Dirty Vibes Music Fest 2019- Picture 87,Dirty Vibes Music Fest 2019- Picture 88,Dirty Vibes Music Fest 2019- Picture 89,Dirty Vibes Music Fest 2019- Picture 90,Dirty Vibes Music Fest 2019- Picture 91,Dirty Vibes Music Fest 2019- Picture 92,Dirty Vibes Music Fest 2019- Picture 93,Dirty Vibes Music Fest 2019- Picture 94,Dirty Vibes Music Fest 2019- Picture 95,Dirty Vibes Music Fest 2019- Picture 96,Dirty Vibes Music Fest 2019- Picture 97,Dirty Vibes Music Fest 2019- Picture 98,Dirty Vibes Music Fest 2019- Picture 99

(36 photographs): Dirty Vibes Music Fest 2019- Picture 100,Dirty Vibes Music Fest 2019- Picture 101,Dirty Vibes Music Fest 2019- Picture 102,Dirty Vibes Music Fest 2019- Picture 103,Dirty Vibes Music Fest 2019- Picture 104,Dirty Vibes Music Fest 2019- Picture 105,Dirty Vibes Music Fest 2019- Picture 106,Dirty Vibes Music Fest 2019- Picture 107,Dirty Vibes Music Fest 2019- Picture 108,Dirty Vibes Music Fest 2019- Picture 109,Dirty Vibes Music Fest 2019- Picture 110,Dirty Vibes Music Fest 2019- Picture 111,Dirty Vibes Music Fest 2019- Picture 112,Dirty Vibes Music Fest 2019- Picture 113,Dirty Vibes Music Fest 2019- Picture 114,Dirty Vibes Music Fest

2019- Picture 115,Dirty Vibes Music Fest 2019- Picture 116,Dirty Vibes Music Fest 2019- Picture 117,Dirty Vibes Music Fest 2019- Picture 118,Dirty Vibes Music Fest 2019- Picture 119,Dirty Vibes Music Fest 2019- Picture 120,Dirty Vibes Music Fest 2019- Picture 121,Dirty Vibes Music Fest 2019- Picture 122,Dirty Vibes Music Fest 2019- Picture 123,Dirty Vibes Music Fest 2019- Picture 124,Dirty Vibes Music Fest 2019- Picture 125,Dirty Vibes Music Fest 2019- Picture 126,Dirty Vibes Music Fest 2019- Picture 127,Dirty Vibes Music Fest 2019- Picture 128,Dirty Vibes Music Fest 2019- Picture 129,Dirty Vibes Music Fest 2019- Picture 130,Dirty Vibes Music Fest 2019- Picture 131,Dirty Vibes Music Fest 2019- Picture 132,Dirty Vibes Music Fest 2019- Picture 133,Dirty Vibes Music Fest 2019- Picture 134,Dirty Vibes Music Fest 2019- Picture 135

(23 photographs): Dirty Vibes Temptation Tower Takevoer 2019- Picture 1,Dirty Vibes Temptation Tower Takevoer 2019- Picture 2,Dirty Vibes Temptation Tower Takevoer 2019- Picture 3,Dirty Vibes Temptation Tower Takevoer 2019- Picture 4,Dirty Vibes Temptation Tower Takevoer 2019- Picture 5,Dirty Vibes Temptation Tower Takevoer 2019- Picture 6,Dirty Vibes Temptation Tower Takevoer 2019- Picture 7,Dirty Vibes Temptation Tower Takevoer 2019- Picture 8,Dirty Vibes Temptation Tower Takevoer 2019- Picture 9,Dirty Vibes Temptation Tower Takevoer 2019- Picture 10,Dirty Vibes Temptation Tower Takevoer 2019- Picture 11,Dirty Vibes Temptation Tower Takevoer 2019- Picture 12,Dirty Vibes Temptation Tower Takevoer 2019- Picture 13,Dirty Vibes Temptation Tower Takevoer 2019- Picture 14,Dirty Vibes Temptation Tower Takevoer 2019- Picture 15,Dirty Vibes Temptation Tower Takevoer 2019- Picture 16,Dirty Vibes Temptation Tower Takevoer 2019- Picture 17,Dirty Vibes Temptation Tower Takevoer 2019- Picture 18,Dirty Vibes Temptation Tower Takevoer 2019- Picture 19,Dirty Vibes Temptation Tower Takevoer 2019- Picture 20,Dirty Vibes Temptation Tower Takevoer 2019- Picture 21,Dirty Vibes Temptation Tower Takevoer 2019- Picture 22,Dirty Vibes Temptation Tower Takevoer 2019- Picture 23

Names: Matlock, David

previous next

Save, Print and Email (Help Page)
Select Download Format Full Record Format for Print/Save
Enter your email address: Email

EXHIBIT C

The Library has opened access to some reading rooms by appointment only. More. The Jefferson Building has reopened to visitors via timed, ticketed entry. More.

Public Catalog

Copyright Catalog (1978 to present)
Search Request: Left Anchored Copyright Number = vau001426692
Search Results: Displaying 1 of 1 entries

Labeled View

2018 Group Trip and Music Fest.

Type of Work: Visual Material
Registration Number / Date: VAu001426692 / 2021-04-06
Application Title: 2018 Group Trip and Music Fest
Title: 2018 Group Trip and Music Fest. [Group registration of unpublished photographs. 44 photographs]
Description: 44 photographs : Electronic file (eService)
Copyright Claimant: David Matlock. Address: 9225 Katy Freeway, Suite 410, Houston, TX, 77024, United States.
Date of Creation: 2018
Authorship on Application: David Matlock; Citizenship: United States. Authorship: photographs.
Rights and Permissions: David Matlock, 9225 Katy Freeway, Suite 410, Houston, TX, 77024, United States
Copyright Note: C.O. correspondence.

Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of unpublished photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) are unpublished AND (b) were created by the same author AND (c) are owned by the same copyright claimant AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title and file name for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Regarding group registration: Registration extends to corresponding photographs in contents titles and in deposit.

Photographs: (44 photographs): Dirty Vibes Music Fest 2018- Picture 1,Dirty Vibes Music Fest 2018- Picture 2,Dirty Vibes Music Fest 2018- Picture 3,Dirty Vibes Music Fest

2018- Picture 4,Dirty Vibes Music Fest 2018- Picture 5,Dirty Vibes Music Fest
2018- Picture 6,Dirty Vibes Music Fest 2018- Picture 7,Dirty Vibes Music Fest
2018- Picture 8,Dirty Vibes Music Fest 2018- Picture 9,Dirty Vibes Music Fest
2018- Picture 10,Dirty Vibes Music Fest 2018- Picture 11,Dirty Vibes Music Fest
2018- Picture 12,Dirty Vibes Music Fest 2018- Picture 13,Dirty Vibes Music Fest
2018- Picture 14,Dirty Vibes Music Fest 2018- Picture 15,Dirty Vibes Music Fest
2018- Picture 16,Dirty Vibes Music Fest 2018- Picture 17,Dirty Vibes Music Fest
2018- Picture 18,Dirty Vibes Music Fest 2018- Picture 19,Dirty Vibes Music Fest
2018- Picture 20,Dirty Vibes Music Fest 2018- Picture 21,Dirty Vibes Music Fest
2018- Picture 22,Dirty Vibes Music Fest 2018- Picture 23,Dirty Vibes Music Fest
2018- Picture 24,Dirty Vibes Music Fest 2018- Picture 25,Dirty Vibes Music Fest
2018- Picture 26,Dirty Vibes Music Fest 2018- Picture 27,Dirty Vibes Music Fest
2018- Picture 28,Dirty Vibes Music Fest 2018- Picture 29,Dirty Vibes Music Fest
2018- Picture 30,Dirty Vibes Music Fest 2018- Picture 31,Dirty Vibes Music Fest
2018- Picture 32,Dirty Vibes Music Fest 2018- Picture 33,Dirty Vibes Music Fest
2018- Picture 34,Dirty Vibes Music Fest 2018- Picture 35,Dirty Vibes Music Fest
2018- Picture 36,Dirty Vibes Music Fest 2018- Picture 37,Dirty Vibes Music Fest
2018- Picture 38,Dirty Vibes Music Fest 2018- Picture 39,Dirty Vibes Music Fest
2018- Picture 40,Dirty Vibes Music Fest 2018- Picture 41,Dirty Vibes Music Fest
2018- Picture 42,Group Trip 2018- Picture 1,Group Trip 2018- Picture 2

Names: Matlock, David

previous next

Save, Print and Email (Help Page)	
Select Download Format	Full Record ▾ Format for Print/Save
Enter your email address:	Email

EXHIBIT D

The Library has opened access to some reading rooms by appointment only. More. The Jefferson Building has reopened to visitors via timed, ticketed entry. More.

Public Catalog

Copyright Catalog (1978 to present)
Search Request: Left Anchored Title = dirtyvibes.com
Search Results: Displaying 1 of 1 entries

previous next

Labeled View

dirtyvibes.com.

Type of Work: Text
Registration Number / Date: TXu002269217 / 2021-04-06
Application Title: dirtyvibes.com.
Title: dirtyvibes.com.
Description: Electronic file (eService)
Copyright Claimant: David Matlock. Address: 9225 Katy Freeway, Suite 410, Houston, TX, 77024, United States.
Date of Creation: 2019
Authorship on Application: David Matlock; Citizenship: United States. Authorship: text, photograph(s)
Ali Birney; Citizenship: United States. Authorship: text.
Pre-existing Material: text and photograph(s)
Basis of Claim: new text and photograph(s)
Rights and Permissions: David Matlock, 9225 Katy Freeway, Suite 410, Houston, TX, 77024, United States
Copyright Note: C.O. correspondence.
Names: Matlock, David
Birney, Ali

previous next

Save, Print and Email (Help Page)	
Select Download Format	Full Record ▾ Format for Print/Save
Enter your email address:	Email