

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.:

DAVID ALLISON, doing business as **CHEAT CODE
CENTRAL**, a sole proprietorship,

Plaintiff,

v.

JOHN DOE,

Defendant.

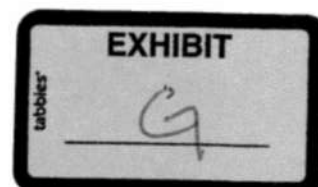
COMPLAINT AND JURY DEMAND

Plaintiff David Allison, doing business as Cheat Code Central, a sole proprietorship, for his Complaint against Defendant John Doe, states as follows:

NATURE OF THE CASE

1. This is an action for copyright infringement brought under the Copyright Laws of the United States, 17 U.S.C. § 101 *et seq.*, unfair competition and passing off brought under the Lanham Act, 15 U.S.C. § 1051 *et seq.*, and state and common law unfair competition.

2. Plaintiff David Allison, doing business as Cheat Code Central, a sole proprietorship (“David Allison”), brings this action because Defendant, individually and in association with third parties, willfully infringed David Allison’s copyrights by copying, reproducing, and distributing David Allison’s copyrighted works without authorization and willfully engaged in unfair competition by passing off David Allison’s copyrighted works as if they were Defendant’s works.



JURISDICTION AND VENUE

3. Jurisdiction is predicated upon 28 U.S.C. §§ 1331, 1338(a) and (b), and 1367(a). As the parties are citizens of different states and as the matters in controversy exceed the sum or value of seventy-five thousand dollars (\$75,000.00), exclusive of interest and costs, this court also has jurisdiction over the state-law claims herein under 28 U.S.C. § 1332.

4. David Allison's claims arise in whole or in part in this District; Defendant operates and/or transacts business in this District, and Defendant has aimed its tortious conduct in whole or in part at this District. Accordingly, venue is proper under 28 U.S.C. §§ 1391(b) and (c), and 1400(a).

PARTIES

5. David Allison is a sole proprietorship with its principal place of business located in Broomfield, Colorado, and operates a website located at *www.cheatcc.com*. David Allison owns the exclusive copyrights to each of the web pages posted at *www.cheatcc.com*, as fully set forth below.

6. The true name and capacity of the Defendant is unknown to Plaintiff at this time. Defendant is known to Plaintiff only by the *www.Ps3cheats.com* website where the infringing activity of the Defendant was observed. Plaintiff believes that information obtained in discovery will lead to the identification of Defendant's true name.

GENERAL ALLEGATIONS

Plaintiff's Ownership of Copyrights Covering Web Pages

7. David Allison operates a premier website providing video game "cheat" codes, located at *www.cheatcc.com*. These "cheat" codes allow video game players to access hidden

video game features, and are not typically included as part of the instruction manuals that accompany video game purchases. Rather, they must be discovered through either experimentation or receipt of direct information from the video game programmers. There is a long tradition of video game programmers and manufacturers incorporating these hidden cheat codes in their video games. As a result, a market has developed for information describing these hidden cheat codes for video game users.

8. David Allison began writing about video game cheat codes as early as May 1997, and in 1999/2000, he wrote and published a book on video game cheat codes, entitled *The Ultimate Code Book*.

9. David Allison also owns and operates a web site located at *www.cheatcc.com*, where he writes, compiles, arranges, and posts information and commentary on cheat codes for thousands of video games across the most popular platforms in the gaming industry. David Allison wrote the text contained on each cheat code web page located at *www.cheatcc.com*, and solely created the compilation and arrangement of the cheat code information on each of those pages.

10. David Allison has built up a reputation for presenting quality cheat code guides through the published books and web site postings he has written. As part of his work, David Allison built relationships with video game developers, which allowed him to obtain and write about the latest and most interesting cheat codes. This information is a highly desired item among video game users.

11. David Allison began to post web pages containing his commentary on video game codes on the *www.cheatcc.com* web site October 1998. Since that time, David Allison has

continually updated the *www.cheatcc.com* website by posting new web pages about additional games and/or updating and revising the previously up loaded web pages. David Allison is the sole author of all video game cheat code commentary published on the *www.cheatcc.com* website.

12. David Allison's book, *The Ultimate Code Book*, and the content of the *www.cheatcc.com* web site, ("the Copyrighted Web Pages"), have been registered with the United States Copyright Office as follows:

Name of Work	Copyright Registration No.	Registration Date
The Ultimate Code Book	TX-5-116-527	January 5, 2000
Cheatcc.com web site	TX-6-162-180	May 12, 2005

(A true and correct copy of the copyright registration certificate for the Copyrighted Web Pages is attached as **Exhibit A**.)

13. David Allison created the Copyrighted Web Pages listed above and fixed them in a tangible medium, with the exception of any third party banner ads contained on the pages. The Copyrighted Web Pages are David Allison's original works of authorship and constitute copyrightable subject matter under the copyright laws of the United States.

14. David Allison's Copyrighted Web Pages have been published on the *www.cheatcc.com* web site, where they can be viewed and/or downloaded by any person. The *www.cheatcc.com* web site contains a copyright notice indicating that the content is owned by Cheat Code Central, the name of David Allison's sole proprietorship.

15. The quality and breadth of the video game cheat code commentary posted on the *www.cheatcc.com* drives a significant volume of traffic to the website, which in turn, generates advertising revenue. In the past, the *www.cheatcc.com* web site has received between six and seven million unique visitors per month.

Defendant's Wrongful Acts

16. Upon information and belief, Defendant owns and operates the *www.Ps3cheats.com* website. The *www.Ps3cheats.com* website is devoted to providing video game cheat codes for popular gaming platforms, including PlayStation 2, PlayStation 3, Sony PSP, XBox, XBox 360, Gameboy Advance, Nintendo DS, Nintendo Wii, Gamecube, PC, Playstation, Dreamcast, Nintendo 64, DVD and Gameboy platforms, that directly compete with David Allison's *www.cheatcc.com* website.

17. The text on the *www.Ps3cheats.com* web pages providing the cheat codes for the platforms listed above ("www.Ps3cheats.com Web Pages") are identical to pages from David Allison's Copyrighted Web Pages, with the sole exception that banner ads contained on the respective pages are different.

18. On information or belief, Defendant copied David Allison's Copyrighted Web Pages and reproduced those pages in their entirety (with the exception of banner ads) on one or more of the *www.Ps3cheats.com* Web Pages, where they are currently on public display.

19. Defendant displayed and distributed copies of the *www.Ps3cheats.com* Web Pages without conspicuously and appropriately publishing on each copy an appropriate copyright notice crediting David Allison and/or Cheat Code Central as the original author of the work.

20. Defendant is not now, nor has ever been, authorized or licensed to copy, reproduce, modify, distribute, or display any of David Allison's Copyrighted Web Pages. Nor has David Allison authorized Defendant to engage in the activities about which he now complains.

21. Defendant falsely represented to customers, potential customers, and/or others, directly and/or indirectly, that the text on the *www.Ps3cheats.com* Web Pages posted on one or more of the *www.Ps3cheats.com* websites originated from Defendant.

22. Defendant had actual knowledge of David Allison's copyrights and copyright notices. Despite this knowledge, Defendant willfully copied, reproduced, modified, displayed and/or distributed unauthorized (and therefore infringing) copies of David Allison's Copyrighted Web Pages, and passed off David Allison's Copyrighted Web Pages as Defendant's own.

23. Defendant copied, reproduced, modified, displayed, and/or distributed the *www.Ps3cheats.com* Web Pages for the purposes of commercial advantage and/or private financial gain.

Injury to David Allison

24. David Allison is informed and believes, and on that basis alleges, that unless enjoined by this Court, Defendant intends to continue their course of wrongful conduct and to continue to copy, reproduce, modify, distribute, display, use, infringe upon, and/or otherwise profit from David Allison's Copyrighted Web Pages and the *www.Ps3cheats.com* Web Pages directly copied from David Allison's Copyrighted Web Pages. As a direct and proximate result of Defendant's wrongful acts, David Allison has already suffered irreparable injury and monetary damages in an undetermined amount.

25. David Allison is informed and believes that, since Defendant directly copied David Allison's Copyrighted Web Pages and posted them as their own on one or more of the *www.Ps3cheats.com* Web Pages, traffic to David Allison's *www.cheatcc.com* website has gone down, while traffic to Defendant's *www.Ps3cheats.com* website has increased.

26. David Allison has no adequate remedy at law to redress all of the injuries that Defendant has caused and are likely to continue to cause by their conduct. David Allison will continue to suffer irreparable injury and monetary damage until Defendant's wrongful actions are enjoined by this Court.

FIRST CLAIM FOR RELIEF

Copyright Infringement – 17 U.S.C. §§ 101 *et seq.*

27. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

28. David Allison's Copyrighted Web Pages were automatically subject to copyright protection under 17 U.S.C. § 102(a) when David Allison fixed such works in a tangible medium of expression. David Allison received Copyright Registration TX-5-116-527 for his book entitled *The Ultimate Code Book*, which registration has an effective date of January, 5, 2000. David Allison received Copyright Registration TX-6-162-180 for the "Cheatcc.com web site," which registration has an effective date of May 12, 2005. These copyright registrations fulfill the jurisdictional requirements of 17 U.S.C. § 411(a) to bring a copyright action regarding the Copyrighted Web Pages.

29. Certificates of Copyright Registration constitute prima facie evidence of the validity of the copyrights and of the facts stated in the certificates, under 17 U.S.C. § 410(c). David Allison's registered copyrights are entitled to a statutory presumption of validity.

30. By the actions alleged above, Defendant has infringed and are continuing to infringe David Allison's copyrights in and relating to the Copyrighted Web Pages by copying, reproducing, modifying, displaying and/or distributing, without David Allison's authorization, web pages which contain direct, verbatim copies of David Allison's Copyrighted Web Pages in violation of 17 U.S.C. §§ 106 and 501.

31. Upon information and belief, after a reasonable opportunity for further investigation or discovery, there is likely to be evidentiary support that Defendant's conduct was and is willfully done with knowledge of David Allison's copyrights.

32. David Allison has no adequate remedy at law. Defendant's conduct has caused, and, if not enjoined will continue to cause, irreparable harm to David Allison. As a result of Defendant's wrongful conduct, David Allison is entitled to injunctive relief, actual damages, and Defendant's profits.

SECOND CLAIM FOR RELIEF

Passing Off and Federal Unfair Competition – 15 U.S.C. § 1051 *et seq.*

33. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

34. The aforesaid acts of Defendant are likely to cause confusion, mistake, or deception as to the origin, sponsorship, or approval of Defendant's goods, and also misrepresent the nature, characteristics, and qualities of Defendant's goods. Defendant's actions constitute false designations of origin, unfair competition, false advertising, and passing off in violation of Section 43(a) of the Trademark Act of 1946, as amended, 15 U.S.C. § 1125(a). Such actions were and are willful and deliberate.

35. David Allison has no adequate remedy at law. Defendant's conduct has caused, and, if not enjoined will continue to cause, irreparable harm to David Allison. As a result of Defendant's wrongful conduct, David Allison is entitled to injunctive relief, actual damages, Defendant's profits, exemplary damages, attorney's fees, and costs.

THIRD CLAIM FOR RELIEF
Common Law Unfair Competition

36. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

37. The aforesaid acts of Defendant constitute common law unfair competition in Colorado and other states where Defendant offers and/or advertises its goods, including this District, and violate of the common law of Colorado and laws of other states, by reason of which David Allison has suffered, and will continue to suffer, irreparable injury and monetary damages in an undetermined amount. Such actions were and are willful and deliberate.

38. As a result of Defendant's wrongful conduct, David Allison is entitled to injunctive relief, actual damages, Defendant's profits, exemplary damages, attorney's fees, and costs.

FOURTH CLAIM FOR RELIEF
Deceptive Trade Practices, Colorado Consumer Protection Act – Colo. Rev. Stat. § 6-1-105(1)

39. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

40. The aforesaid acts of Defendant constitute deceptive trade practices under the Colorado Consumer Protection Act, Colo. Rev. Stat. § 6-1-105(1). Such acts were undertaken willfully, wantonly and in bad faith.

41. David Allison has been injured by Defendant's deceptive trade practices taken in the course of their business. Defendant's deceptive trade practices have had and are continuing to have a significant impact on the consuming public that seeks cheat code information.

42. As a result of Defendant's deceptive trade practices, David Allison has been damaged. David Allison will continue to sustain irreparable injury and monetary damages from Defendant's deceptive trade practices unless and until Defendant is enjoined from continuing their unlawful conduct. David Allison is entitled to recover actual or statutory damages, Defendant's profits, exemplary damages, reasonable attorneys' fees, and costs in connection with this claim, as well as appropriate equitable relief.

PRAYER FOR RELIEF

WHEREFORE, David Allison prays that this Court enter judgment in his favor on each and every claim for relief set forth above, and award David Allison all appropriate relief, including but not limited to the following:

- A. Declare that Defendant has infringed David Allison's copyrights covering his Copyrighted Web Pages.
- B. Declare that Defendant has engaged in unfair competition and deceptive trade practices, and has violated Section 43(a) of the Lanham Act, as well as Colorado statutes and the common law.
- C. Order that, pursuant to 17 U.S.C. § 502 and/or 17 U.S.C. § 1203, Defendant and all of its employees, servants, agents, distributors, and persons in active concert or participation with it be preliminarily during the pendency of this action and permanently thereafter enjoined from copying, reproducing, modifying,

displaying and/or distributing the *www.Ps3cheats.com* Web Pages and/or the Copyrighted Web Pages, or otherwise infringing David Allison's copyrights.

- D. Order the impounding for destruction of all copies or reproductions of any products containing unauthorized reproductions of David Allison's Copyrighted Web Pages, including but not limited to the *www.Ps3cheats.com* Web Pages.
- E. Order an accounting of Defendant's profits and award David Allison its actual damages and Defendant's profits not taken into account in calculating actual damages, including increased damages for willful violations of David Allison's rights.
- F. Award David Allison monetary relief in an amount to be fixed by the Court in its discretion as just, including:
 - (a) All profits received by Defendant from sales and revenues of any kind made as a result of its infringing or otherwise wrongful actions;
 - (b) All damages sustained by David Allison as a result of Defendant's acts, and that such damages be trebled pursuant to 15 U.S.C. § 1117 and/or 18 U.S.C. § 1964(c), and Colo. Rev. Stat. § 6-1-113; and
 - (c) Exemplary damages in view of the intentional, malicious, and bad faith nature of Defendant's actions.
- G. Award David Allison prejudgment and post-judgment interest, and David Allison's costs and attorney's fees.
- H. Award David Allison such other and further relief as this Court deems just and appropriate.

JURY DEMAND

Plaintiff David Allison, doing business as Cheat Code Central, demands a trial by jury on all issues so triable.

Respectfully submitted this 22nd day of
February, 2007

s/ Jared B. Briant

Mark W. Fischer

Jared B. Briant

FAEGRE & BENSON LLP

1900 Fifteenth Street

Boulder, Colorado 80302

Tel. - (303) 447-7700

Fax - (303) 447-7800

E-mail – mfischer@faegre.com

jbriant@faegre.com

Attorneys for Plaintiff DAVID ALLISON

Plaintiff's Address:

Cheat Code Central

4560 Augusta Drive

Broomfield, Colorado 80020

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form TX
For a Nondramatic Literary Work

REGI TX 6-162-180



EFFECTIVE DATE OF REGISTRATION

MAY 12 2005
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1 TITLE OF THIS WORK ▼
Cheatcc.com website

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give. Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2 a NAME OF AUTHOR ▼ David Allison DATES OF BIRTH AND DEATH
Year Born ▼ 1980 Year Died ▼

Was this contribution to the work a "work made for hire"? Yes No
AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of ▼ USA OR Domiciled in ▼
WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Yes No Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼
Revised text & compilation of website, excluding any third party banner ads

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

b NAME OF AUTHOR ▼ DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? Yes No
AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of ▼ OR Domiciled in ▼
WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Yes No Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

c NAME OF AUTHOR ▼ DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? Yes No
AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of ▼ OR Domiciled in ▼
WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Yes No Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED This information must be given in all cases. 2005 b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK Complete this information ONLY if this work has been published. Month ▶ May Day ▶ 4 Year ▶ 2005

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2 ▼
David Allison
4560 Augusta Drive
Broomfield, CO 80020

APPLICATION RECEIVED 5/12/05 6/7/05
ONE DEPOSIT RECEIVED 5/12/05 6/7/05
TWO DEPOSITS RECEIVED

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

FUNDS RECEIVED

MORE ON BACK ▶ Complete all applicable spaces (numbers 5-8) on the reverse side of this page. See detailed instructions. Sign the form at the B.

DO NOT WRITE HERE Page 1 of 4 pages

EXHIBIT A

EXAMINED BY MB	FORM TX
CHECKED BY	
<input checked="" type="checkbox"/> CORRESPONDENCE Yes	FOR COPYRIGHT OFFICE USE ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼

a. This is the first published edition of a work previously registered in unpublished form.

b. This is the first application submitted by this author as copyright claimant

c. This is a changed version of the work, as shown by space 6 on this application

If your answer is "Yes," give Previous Registration Number ▶

Year of Registration ▶

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

Previously published version of website; website incorporates some material from prior registration TX-5-116-527, The Ultimate Code Book, by David Allison: third-party banner advertisements

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

Revised text & compilation of website, specifically, the addition of new website pages for Haunting Ground (PlayStation 2); Star Wars: Episode 3 - Revenge Of The Sith (PlayStation 2 & Xbox); Grand Theft Auto: San Andreas (PlayStation 2); MX vs. ATV Unleashed (PlayStation 2 & Xbox); Lego Star Wars (PlayStation 2, Xbox, PC); Splinter Cell: Chaos Theory (PlayStation 2, Xbox, PC, GameCube); Megaman X3 (PlayStation 2); Dynasty Warriors 5 (PlayStation 2); (Cont)

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account. Name ▼ Account Number ▼

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

Elizabeth McGoogan Magnuson, Faegre & Benson
1900 Fifteenth Street
Boulder, CO 80302-5414

Area code and daytime telephone number ▶ 303-447-7700

Fax number ▶ 303-447-7800

Email ▶ bmagnuson@faegre.com

CERTIFICATION* I, the undersigned, hereby certify that I am the

Check only one ▶

author

other copyright claimant

owner of exclusive right(s)

authorized agent of David Allison

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Elizabeth McGoogan Magnuson

Date ▶ 06/03/2005

Handwritten signature (X) ▼

X Elizabeth M'Goog Magnuson

Certificate will be mailed in window envelope to this address:

Name ▼	Elizabeth McGoogan Magnuson, c/o Faegre & Benson
Number/Street/Apt ▼	1900 Fifteenth Street
City/State/ZIP ▼	Boulder, CO 80302-5414

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL ELEMENTS IN THE SAME PACKAGE

1. Application form
2. Nonrefundable filing fee in check or money order payable to Registrar of Copyrights
3. Deposit material

MAIL TO:
Library of Congress
Copyright Office - TX
101 Independence Avenue, S.E.
Washington, D.C. 20540-0222

For more related to Copyright, see current laws, check the Copyright Office website at www.copyright.gov, or in the Copyright Office, or call (202) 707-5900

9

*17 U.S.C. § 506(e) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

CONTINUATION SHEET FOR APPLICATION FORMS

Form TX / CON
UNITED STATES COPYRIGHT OFFICE

TX 6-162-180



PA | PAU | SE | SEG | SEU | SR | SHU | TX | XU | VA | VAU

EFFECTIVE DATE OF REGISTRATION

MAY 12 2008
(Month) (Day) (Year)

CONTINUATION SHEET RECEIVED

Page 3 of 4 pages

- This Continuation Sheet is used in conjunction with Forms CA, PA, SE, SR, TX, and VA, only. Indicate which basic form you are continuing in the space in the upper right-hand corner.
- If at all possible, try to fit the information called for into the spaces provided on the basic form.
- If you do not have enough space for all the information you need to give on the basic form, use this Continuation Sheet and submit it with the basic form.
- If you submit this Continuation Sheet, clip (do not tape or staple) it to the basic form and fold the two together before submitting them.
- Space A of this sheet is intended to identify the basic application.
- Space B is a continuation of Space 2 on the basic application.
- Space B is not applicable to Short Forms.
- Space C (on the reverse side of this sheet) is for the continuation of Spaces 1, 4, or 6 on the basic application or for the continuation of Space 1 on any of the three Short Forms PA, TX, or VA.

DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

IDENTIFICATION OF CONTINUATION SHEET: This sheet is a continuation of the application for copyright registration on the basic form submitted for the following work.

- **TITLE.** (Give the title as given under the heading "Title of this Work" in Space 1 of the basic form.)

A
Identification
of
Application

Cheatcc.com website
 • **NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S):** (Give the name and address of at least one copyright claimant as given in Space 4 of the basic form or Space 2 of any of the Short Forms PA, TX, or VA.)
 David Allison, 4560 Augusta Drive, Broomfield, CO 80020

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

B
Continuation
of Space 2

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
 OR { Citizen of ▶ _____
 Domiciled in ▶ _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
 Anonymous? Yes No
 Pseudonymous? Yes No
If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

e

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
 OR { Citizen of ▶ _____
 Domiciled in ▶ _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
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NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

f

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
 OR { Citizen of ▶ _____
 Domiciled in ▶ _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
 Anonymous? Yes No
 Pseudonymous? Yes No
If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

Use the reverse side of this sheet if you need more space for continuation of Spaces 1, 4, or 6 of the basic form or for the continuation of Space 1 on any of the Short Forms PA, TX, or VA.

CONTINUATION SHEET FOR APPLICATION FORMS

Form TX / CON
UNITED STATES COPYRIGHT OFFICE

TX 6-162-180



478006162180

PA | PAU | SE | SEG | SEU | SR | SRU | TX | TXU | VA | VAU

EFFECTIVE DATE OF REGISTRATION

MAY 12 2008
(Month) (Day) (Year)

CONTINUATION SHEET RECEIVED

Page 3 of 4 pages

- This Continuation Sheet is used in conjunction with Forms CA, PA, SE, SR, TX, and VA, only. Indicate which basic form you are continuing in the space in the upper right-hand corner.
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- If you submit this Continuation Sheet, clip (do not tape or staple) it to the basic form and fold the two together before submitting them.
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- **TITLE.** (Give the title as given under the heading "Title of this Work" in Space 1 of the basic form.)

A

Identification of Application

Cheatcc.com website

- **NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S):** (Give the name and address of at least one copyright claimant as given in Space 4 of the basic form or Space 2 of any of the Short Forms PA, TX, or VA.)

David Allison, 4560 Augusta Drive, Broomfield, CO 80020

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

B

Continuation of Space 2

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR
 Citizen of ▶ _____
 Domiciled in ▶ _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR
 Citizen of ▶ _____
 Domiciled in ▶ _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
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If the answer to either of these questions is "Yes," see detailed instructions

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Name of Country
OR
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 Domiciled in ▶ _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

Use the reverse side of this sheet if you need more space for continuation of Spaces 1, 4, or 6 of the basic form or for the continuation of Space 1 on any of the Short Forms PA, TX, or VA.

CIVIL COVER SHEET

JS 44 (Rev. 11/04)

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

<p>I. (a) PLAINTIFFS</p> <p>DAVID ALLISON, doing business as CHEAT CODE CENTRAL, a sole proprietorship,</p> <p>(b) County of Residence of First Listed Plaintiff <u>Broomfield County, CO</u> (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p>(c) Attorney's (Firm Name, Address, and Telephone Number) Mark F. Fischer, Jared B. Briant, Faegre & Benson LLP, 1900 15th Street, Boulder, CO 303-447-7700</p>	<p>DEFENDANTS</p> <p>JOHN DOE</p> <p>County of Residence of First Listed Defendant <u>N/A</u> (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.</p> <p>Attorneys (If Known)</p>
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<p>II. BASIS OF JURISDICTION (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table style="width:100%;"> <tr> <td style="width:33%;">PTF</td> <td style="width:33%;">DEF</td> <td style="width:33%;"></td> </tr> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> 1 <input type="checkbox"/> 1</td> <td>Incorporated <i>or</i> Principal Place of Business In This State</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2 <input type="checkbox"/> 2</td> <td>Incorporated <i>and</i> Principal Place of Business In Another State</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3 <input type="checkbox"/> 3</td> <td>Foreign Nation</td> </tr> <tr> <td></td> <td></td> <td><input type="checkbox"/> 4 <input type="checkbox"/> 4</td> </tr> <tr> <td></td> <td></td> <td><input type="checkbox"/> 5 <input type="checkbox"/> 5</td> </tr> <tr> <td></td> <td></td> <td><input type="checkbox"/> 6 <input type="checkbox"/> 6</td> </tr> </table>	PTF	DEF		Citizen of This State	<input type="checkbox"/> 1 <input type="checkbox"/> 1	Incorporated <i>or</i> Principal Place of Business In This State	Citizen of Another State	<input type="checkbox"/> 2 <input type="checkbox"/> 2	Incorporated <i>and</i> Principal Place of Business In Another State	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3 <input type="checkbox"/> 3	Foreign Nation			<input type="checkbox"/> 4 <input type="checkbox"/> 4			<input type="checkbox"/> 5 <input type="checkbox"/> 5			<input type="checkbox"/> 6 <input type="checkbox"/> 6
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IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p>PERSONAL INJURY</p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <p>PERSONAL INJURY</p> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p>PERSONAL PROPERTY</p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <p style="text-align:center;">PROPERTY RIGHTS</p> <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <p style="text-align:center;">SOCIAL SECURITY</p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIW C/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	FEDERAL TAX SUITS
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence <p>Habeas Corpus:</p> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
17 U.S.C. §§ 101 et seq.

Brief description of cause:
Copyright Infringement

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** _____ CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

DATE: 2/22/07 SIGNATURE OF ATTORNEY OF RECORD: s/ Jared B. Briant

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

Thu Feb 22 16:45:33 2007

UNITED STATES DISTRICT COURT

DENVER , CO

Receipt No. 100 274625
Cashier stacie

C.C. Number: SEE CC REC 03/07

DO Code Div No
4613 1

Sub Acct	Type	Tender	Amount
1:510000	N	4	190.00
2:006900	N	4	60.00
3:006400	N	4	100.00

Total Amount \$ 350.00

FROM FAEGRE & BENSON

07-CV-00373, NEW COMPLAINT, ALLISON V DD
E, SG

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.: _____

DAVID ALLISON, doing business as **CHEAT CODE
CENTRAL**, a sole proprietorship,

Plaintiff,

v.

CRAVE ONLINE MEDIA, LLC, a California limited liability
company, and

ANDREW SIMON, an individual,

Defendants.

VERIFIED COMPLAINT AND JURY DEMAND

Plaintiff David Allison, doing business as Cheat Code Central, a sole proprietorship, for his Complaint against Defendants Crave Online Media, LLC and Andrew Simon, states as follows:

NATURE OF THE CASE

1. This is an action for copyright infringement brought under the Copyright Laws of the United States, 17 U.S.C. § 101 *et seq.*, unfair competition and passing off brought under the Lanham Act, 15 U.S.C. § 1051 *et seq.*, and state and common law unfair competition

2. Plaintiff David Allison, doing business as Cheat Code Central, a sole proprietorship (“David Allison”), brings this action because Defendants, individually and in association with each other and/or third parties, willfully infringed David Allison’s copyrights by

copying, reproducing, and distributing David Allison's copyrighted works without authorization and willfully engaged in unfair competition by passing off David Allison's copyrighted works as if they were Defendants' works.

JURISDICTION AND VENUE

3. Jurisdiction is predicated upon 28 U.S.C. §§ 1331, 1338(a) and (b), and 1367(a). As the parties are citizens of different states and as the matters in controversy exceed the sum or value of seventy-five thousand dollars (\$75,000.00), exclusive of interest and costs, this court also has jurisdiction over the state-law claims herein under 28 U.S.C. § 1332.

4. David Allison's claims arise in whole or in part in this District; Defendants operate and/or transact business in this District, and the Defendants have aimed their tortious conduct in whole or in part at this District. Accordingly, venue is proper under 28 U.S.C. §§ 1391(b) and (c), and 1400(a).

PARTIES

5. David Allison is a sole proprietorship with its principal place of business located in Broomfield, Colorado, and operates a website located at www.cheatcc.com. David Allison owns the exclusive copyrights to each of the web pages posted at www.cheatcc.com, as fully set forth below.

6. Defendant Crave Online Media, Inc. ("Crave") is a limited liability company organized under the laws of the State of California, with its principal place of business in Santa Monica, California. Crave is a direct competitor of David Allison.

7. Defendant Andrew Simon is an employee and/or independent contractor of Defendant Crave; and/or is an individual who directly participated in and/or directed the acts described below.

FACTS

Plaintiff's Ownership of Copyrights Covering Web Pages

8. David Allison operates a premier website relating to video game “cheat” codes, located at www.cheatcc.com. These “cheat” codes allow video game players to access hidden video game features, and are not typically included as part of the instruction manuals that accompany video game purchases. Rather, they must be discovered through either experimentation or receipt of direct information from the video game programmers. There is a long tradition of video game programmers and manufacturers incorporating these hidden cheat codes in their video games. As a result, a market has developed for information describing these hidden cheat codes for video game users.

9. David Allison began writing about video game cheat codes as early as May 1997, and in 1999/2000, he wrote and published a book on video game cheat codes, entitled *The Ultimate Code Book*.

10. David Allison also owns and operates a web site located at www.cheatcc.com, where he writes, compiles, arranges, and posts information and commentary on cheat codes for thousands of video games across numerous platforms, including games used with the PlayStation 2 and X-Box consoles, which are two of the most popular platforms. David Allison wrote the text contained on each cheat code web page located at www.cheatcc.com, and the text,

compilation, and arrangement of the cheat code information on those pages was solely created by David Allison

11. David Allison has built up a reputation for presenting quality cheat code guides through the published books and web site postings he has written. As part of his work, David Allison built relationships with video game developers, which allowed him to obtain and write about the latest and most interesting cheat codes.

12. Cheat code information is a highly desired item among video game users.

13. David Allison began to post web pages containing his commentary on PlayStation 2 video game codes on the www.cheatcc.com web site around March 2000 and on X-Box video game codes around November 2001. Since that time, Mr. Allison has continually updated the www.cheatcc.com website by posting new web pages about additional games and/or updating and revising the previously up loaded web pages. David Allison is the sole author of all video game cheat code commentary published on the www.cheatcc.com website.

14. David Allison's book, *The Ultimate Code Book*, and the content of the www.cheatcc.com web site, ("the Copyrighted Web Pages"), have been registered with the United States Copyright Office as follows:

Name of Work	Copyright Registration No.	Registration Date
The Ultimate Code Book	TX-5-116-527	January 5, 2000
Cheatcc.com web site	TX-6-162-180	May 12, 2005

(A true and correct copy of the copyright registration certificate for the Copyrighted Web Pages is attached as **Exhibit A.**)

15. David Allison created the Copyrighted Web Pages listed above and fixed them in a tangible form, with the exception of any third party banner ads contained on the pages. The Copyrighted Web Pages are David Allison's original works of authorship and constitute copyrightable subject matter under the copyright laws of the United States.

16. David Allison's Copyrighted Web Pages were published on the www.cheatcc.com web site, where they can be viewed and/or downloaded by any person. The www.cheatcc.com web site contains a copyright notice indicating that the content is owned by Cheat Code Central, the name of David Allison's sole proprietorship.

17. The quality and breadth of the video game cheat code commentary posted on the www.cheatcc.com drives a significant volume of traffic to the website, which in turn, generates advertising revenue. In the past, the www.cheatcc.com web site has received between six and seven million unique visitors per month.

Defendants' Wrongful Acts

18. On or about December 2, 2004, Andrew Simon, an employee or independent contractor of Crave, contacted David Allison by email to inquire about the possibility of advertising the www.craveonline.com website on David Allison's www.cheatcc.com website.

19. During the month of December, Andrew Simon (on behalf of Crave) and David Allison discussed the possibility of various cross-marketing opportunities. But by the end of December 2004 / beginning of January 2005, it was clear that Crave was no longer interested in working with David Allison and www.cheatcc.com.

20. After David Allison published his Copyrighted Web Pages, Crave started a section on its www.craveonline.com web site devoted to PlayStation 2 and X-Box video game

cheat codes that directly competes with David Allison's www.cheatcc.com website. This section of the www.craveonline.com website is currently located at http://video.craveonline.com/games/cheats/xbox/cheats_a.php, http://video.craveonline.com/games/cheats/ps2/cheats_a.php, http://www.craveonline.com/games/cheats/xbox/cheats_a.php, and http://www.craveonline.com/games/cheats/ps2/cheats_a.php.

21. The text on the Crave web pages dealing with PlayStation 2 and X-Box cheat codes ("Crave Infringing Web Pages") are identical to pages from David Allison's Copyrighted Web Pages, with the sole exception that banner ads contained on the respective pages are different. (A true and correct copy of a list of the cheat code pages that were copied is attached as **Exhibit B**.) A comparison demonstrating the identity between the Copyrighted Web Pages and the Crave Infringing Web Pages is attached as **Exhibit C**.

22. On information or belief, on or about December 2004, Defendants copied David Allison's Copyrighted Web Pages and reproduced those pages in their entirety (with the exception of banner ads) on the www.craveonline.com web site, where they are currently on public display.

23. Defendants displayed and distributed copies of the Crave Infringing Works without conspicuously and appropriately publishing on each copy an appropriate copyright notice crediting David Allison and/or Cheat Code Central as the original author of the work.

24. Defendants are not now, nor have they ever been, authorized or licensed to copy, reproduce, modify, distribute, or display any of David Allison's Copyrighted Web Pages. Nor

has David Allison authorized Defendants to engage in the activities about which he now complains.

25. Defendants falsely represented to customers, potential customers, and/or others, directly and/or indirectly, that the Crave Infringing Web Pages they posted on the www.craveonline.com web site originated from Crave.

26. Defendants had actual knowledge of David Allison's copyrights and copyright notices. Despite this knowledge, Defendants willfully copied, reproduced, modified, displayed and/or distributed unauthorized (and therefore infringing) copies of some of David Allison's Copyrighted Web Pages, and passed off David Allison's Copyrighted Web Pages as Crave's own.

27. Defendants copied, reproduced, modified, displayed, and/or distributed the Crave Infringing Web Pages for the purposes of commercial advantage and/or private financial gain.

Injury to David Allison

28. David Allison is informed and believes, and on that basis alleges, that unless enjoined by this Court, Defendants intend to continue their course of wrongful conduct and to continue to copy, reproduce, modify, distribute, display, use, infringe upon, and/or otherwise profit from David Allison's Copyrighted Web Pages and the Crave Infringing Web Pages directly copied from David Allison's Copyrighted Web Pages. As a direct and proximate result of Defendants' wrongful acts, David Allison has already suffered irreparable injury and monetary damages in an undetermined amount.

29. David Allison is informed and believes that, since Crave directly copied David Allison's Copyrighted Web Pages and posted them as their own on the www.craveonline.com

web site, traffic to David Allison's www.cheatcc.com website has gone down, while traffic to Crave's www.craveonline.com website has increased.

30. David Allison has no adequate remedy at law to redress all of the injuries that Defendants have caused and are likely to continue to cause by their conduct. David Allison will continue to suffer irreparable injury and monetary damage until Defendants' wrongful actions are enjoined by this Court.

COUNT I
Copyright Infringement
17 U.S.C. §§ 101 et seq.

31. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

32. David Allison's Copyrighted Web Pages were automatically subject to copyright protection under 17 U.S.C. § 102(a) when David Allison fixed such works in a tangible medium of expression. David Allison received Copyright Registration TX-5-116-527 for his book entitled *The Ultimate Code Book*, which registration has an effective date of January, 5, 2000. David Allison received Copyright Registration TX-6-162-180 for the "Cheatcc.com web site," which registration has an effective date of May 12, 2005. These copyright registrations fulfill the jurisdictional requirements of 17 U.S.C. § 411(a) to bring a copyright action regarding the Copyrighted Web Pages.

33. Certificates of Copyright Registration constitute prima facie evidence of the validity of the copyrights and of the facts stated in the certificates. 17 U.S.C. § 410(c). David Allison's registered copyrights are entitled to such statutory presumption of validity.

34. By the actions alleged above, Defendants have infringed and are continuing to infringe David Allison's copyrights in and relating to the Copyrighted Web Pages by copying, reproducing, modifying, displaying and/or distributing, without David Allison's authorization, web pages which contain direct, verbatim copies of David Allison's Copyrighted Web Pages in violation of 17 U.S.C. §§ 106 and 501.

35. Upon information and belief, after a reasonable opportunity for further investigation or discovery, there is likely to be evidentiary support that Defendants' conduct was and is willfully done with knowledge of David Allison's copyrights.

36. David Allison has no adequate remedy at law. Defendants' conduct has caused, and, if not enjoined will continue to cause, irreparable harm to David Allison. As a result of Defendants' wrongful conduct, David Allison is entitled to injunctive relief, actual damages, and Defendants' profits.

COUNT II
Passing Off and Federal Unfair Competition
15 U.S.C. § 1051 et seq.

37. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

38. The aforesaid acts of Defendants are likely to cause confusion, mistake, or deception as to the origin, sponsorship, or approval of Defendants' goods, and also misrepresent the nature, characteristics, and qualities of Defendants' goods. Defendants' actions constitute false designations of origin, unfair competition, false advertising, and passing off in violation of Section 43(a) of the Trademark Act of 1946, as amended, 15 U.S.C. § 1125(a). Such actions were and are willful and deliberate.

39. David Allison has no adequate remedy at law. Defendants' conduct has caused, and, if not enjoined will continue to cause, irreparable harm to David Allison. As a result of Defendants' wrongful conduct, David Allison is entitled to injunctive relief, actual damages, Defendant's profits, exemplary damages, attorney's fees, and costs.

COUNT III
Common Law Unfair Competition

40. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

41. The aforesaid acts of Defendants constitute common law unfair competition in Colorado, California, and other states where Defendants offer and/or advertise their goods, including this District, and violate of the common law of Colorado, California, and laws of other states, by reason of which David Allison has suffered, and will continue to suffer, irreparable injury and monetary damages in an undetermined amount. Such actions were and are willful and deliberate.

42. As a result of Defendants' wrongful conduct, David Allison is entitled to injunctive relief, actual damages, Defendants' profits, exemplary damages, attorney's fees, and costs.

COUNT IV
Deceptive Trade Practices – Colorado Consumer
Protection Act

43. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

44. The aforesaid acts of Defendants constitute deceptive trade practices under the Colorado Consumer Protection Act, Colo. Rev. Stat. §§ 6-1-105(1). Such acts were undertaken willfully, wantonly and in bad faith.

45. David Allison has been injured by Defendants' deceptive trade practices in the course of his business. Defendants' deceptive trade practices have had and are continuing to have a significant impact on the consuming public that seeks cheat code information.

46. As a result of Defendants' deceptive trade practices, David Allison has been damaged. David Allison will continue to sustain irreparable injury and monetary damages from Defendants' deceptive trade practices unless and until Defendants are enjoined from continuing their unlawful conduct. David Allison is entitled to recover actual or statutory damages, Defendants' profits, exemplary damages, reasonable attorneys' fees, and costs in connection with this claim, as well as appropriate equitable relief.

COUNT V
Unfair Competition - California Business and
Professional Code

47. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

48. The aforesaid acts of Defendants constitutes unfair competition in violation of California Business and Professional Code §§ 17200 *et seq.* and 17500 *et seq.* Such actions were and are willful and deliberate.

49. As a result of Defendants' unfair competition, David Allison has been damaged. David Allison will continue to sustain irreparable injury and monetary damages from Defendants' unfair competition unless and until Defendants are enjoined from continuing their

unlawful conduct. David Allison is entitled to recover restitution, reasonable attorneys' fees, and costs in connection with this claim, as well as appropriate equitable relief.

PRAYER FOR RELIEF

WHEREFORE, David Allison prays that this Court enter judgment in his favor on each and every claim for relief set forth above, and award David Allison all appropriate relief, including but not limited to the following:

- A. Declare that Defendants have infringed David Allison's copyrights covering its Copyrighted Web Pages.
- B. Declare that Defendants have engaged in unfair competition and deceptive trade practices, and have violated Section 43(a) of the Lanham Act, as well as Colorado and California statutes and the common law.
- C. Order that, pursuant to 17 U.S.C. § 502 and/or 17 U.S.C. § 1203, Defendants and all of their employees, servants, agents, distributors, and persons in active concert or participation with them be preliminarily during the pendency of this action and permanently thereafter enjoined from copying, reproducing, modifying, displaying and/or distributing the Crave Infringing Web Pages and/or the Copyrighted Web Pages, or otherwise infringing David Allison's copyrights.
- D. Order the impounding for destruction of all copies or reproductions of any products containing unauthorized reproductions of David Allison's Copyrighted Web Pages, including but not limited to the Crave Infringing Web Pages.

- E. Order an accounting of Defendants' profits and award David Allison its actual damages and Defendants' profits not taken into account in calculating actual damages, including increased damages for willful violations of David Allison's rights.
- F. Award David Allison monetary relief in an amount to be fixed by the Court in its discretion as just, including:
 - (a) All profits received by Defendant from sales and revenues of any kind made as a result of its infringing or otherwise wrongful actions;
 - (b) All damages sustained by David Allison as a result of Defendant's acts, and that such damages be trebled pursuant to 15 U.S.C. § 1117 and/or 18 U.S.C. § 1964(c), and Colo. Rev. Stat. § 6-1-113; and
 - (c) Exemplary damages in view of the intentional, malicious, and bad faith nature of Defendant's actions.
- G. Award David Allison prejudgment and post-judgment interest, and David Allison's costs and attorney's fees.
- H. Award David Allison such other and further relief as this Court deems just and appropriate.

JURY DEMAND

Plaintiff David Allison, doing business as Cheat Code Central, demands a trial by jury on all issues so triable.

VERIFICATION

STATE OF COLORADO)
)
COUNTY OF BROOMFIELD)

David Allison, of lawful age, being first duly sworn, upon oath deposes and states:

1. That he is the Plaintiff in the above-entitled cause;
2. That he has read the above and foregoing Verified Complaint and Jury Demand and knows the contents thereof; and
3. That the facts therein set forth are true and correct to the best of his knowledge and belief.

/s/ David Allison
David Allison

SUBSCRIBED AND SWORN TO before me, a notary public, in and for said County and State, this 24th day of June, 2005.

/s/ Maisie Livengood
Notary Public

My Commission Expires:
12/12/08

[SEAL]

Respectfully submitted this 24th day of
June, 2005

By /s/ Christopher P. Beall

Mark W. Fischer
Christopher P. Beall
FAEGRE & BENSON LLP
3200 Wells Fargo Center
1700 Lincoln Street
Denver, Colorado 80203
Tel. - (303) 607-3500
Fax - (303) 607-3600
E-mail – cbeall@faegre.com

Attorneys for Plaintiff,
DAVID ALLISON, d/b/a Cheat Code Central

Plaintiff's Address:
Cheat Code Central
4560 Augusta Drive
Broomfield, Colorado 80020

BLDR1:50228451.04

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form TX
For a Nonperiodic Literary Work

TX 6-162-180



EFFECTIVE DATE OF REGISTRATION

MAY 12 2005
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1 TITLE OF THIS WORK
Chestoc.com website

PREVIOUS OR ALTERNATIVE TITLES

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared.

If published in a periodical or serial give: Volume Number Issue Date On Pages

2 a NAME OF AUTHOR David Allison
DATES OF BIRTH AND DEATH Year Born 1980 Year Died

Was this contribution to the work a "work made for hire"?
 Yes No
AUTHOR'S NATIONALITY OR DOMICILE
OR { Citizen of USA
Domiciled in: _____
WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymity? Yes No
Pseudonym? Yes No

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (as in instructions). For any part of this work that was "made for hire" check "Yes" in the spaces provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for date of birth and death blank.

NATURE OF AUTHORSHIP Briefly describe nature of material created by the author in which copyright is claimed.
Revised text & compilation of website, excluding any third party banner ads

b NAME OF AUTHOR
DATES OF BIRTH AND DEATH Year Born Year Died

Was this contribution to the work a "work made for hire"?
 Yes No
AUTHOR'S NATIONALITY OR DOMICILE
OR { Citizen of _____
Domiciled in: _____
WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymity? Yes No
Pseudonym? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

c NAME OF AUTHOR
DATES OF BIRTH AND DEATH Year Born Year Died

Was this contribution to the work a "work made for hire"?
 Yes No
AUTHOR'S NATIONALITY OR DOMICILE
OR { Citizen of _____
Domiciled in: _____
WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymity? Yes No
Pseudonym? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED 2005
b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK
Month: MAY Day: 4 Year: 2005

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the author as the author given in space 2
David Allison
4560 Augusta Drive
Broomfield, CO 80020

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

APPLICATION RECEIVED 5/12/05 6/7/05
ONE DEPOSIT RECEIVED 5/12/05 6/7/05
TWO DEPOSITS RECEIVED
FUNDS RECEIVED

EXAMINED BY <u>MP</u>	FORM TX
CHECKED BY	
<input checked="" type="checkbox"/> CORRESPONDENCE Yes	FOR COPYRIGHT OFFICE USE ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

- Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▾
 - a. This is the first published edition of a work previously registered in unpublished form.
 - b. This is the first application submitted by this author as copyright claimant.
 - c. This is a changed version of the work, as shown by space 6 on this application.
- If your answer is "Yes," give Previous Registration Number ▶ Year of Registration ▶

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material: Identify any preexisting work or works that this work is based on or incorporates. ▾

Previously published version of website; website incorporates some material from prior registration TX-5-116-527, The Ultimate Code Book, by David Allison; third-party banner advertisements

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▾

Revised text & compilation of website, specifically, the addition of new website pages for Haunting Ground (PlayStation 2); Star Wars: Episode 3 - Revenge Of The Sith (PlayStation 2 & Xbox); Grand Theft Auto: San Andreas (PlayStation 2); MX vs. ATV Unleashed (PlayStation 2 & Xbox); Lego Star Wars (PlayStation 2, Xbox, PC); Splinter Cell: Chaos Theory (PlayStation 2, Xbox, PC, GameCube); Megaman X8 (PlayStation 2); Dynasty Warriors 5 (PlayStation 2); (Cont)

a 6
See instructions before completing this space.

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account. Name ▾ Account Number ▾

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name / Address / Apt / City / State / ZIP ▾

Elizabeth McGoogan Magnuson, Faegre & Benson
1900 Fifteenth Street
Boulder, CO 80302-5414

Area code and daytime telephone number ▶ 303-447-7700

Fax number ▶ 303-447-7800

Email ▶ btmagnuson@faegre.com

b

CERTIFICATION* I, the undersigned, hereby certify that I am the

Check only one ▶

- author
- other copyright claimant
- owner of exclusive rights
- authorized agent of David Allison

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Name of author or other copyright claimant, or owner of exclusive right(s) ▾

Typed or printed name and date ▾ If this application gives a date of publication on space 2, do not sign and submit it before that date.

Elizabeth McGoogan Magnuson

Date ▶ 06/03/2005

Handwritten signature (s) ▾

X Elizabeth M'Googan Magnuson

8

Certificates will be mailed in window envelopes to this address:

Name ▾ Elizabeth McGoogan Magnuson, c/o Faegre & Benson
Number/Street/Apt ▾ 1900 Fifteenth Street
City/State/ZIP ▾ Boulder, CO 80302-5414

9

*17 U.S.C. § 504(a). Any person who knowingly makes a false representation of a material fact in this application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

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U.S. Government Printing Office: 2002-461-112/02/021

CONTINUATION SHEET FOR APPLICATION FORMS

Form TX / CON
UNITED STATES COPYRIGHT OFFICE

TX 5-162-180



PA | PAU | SE | SEB | SEV | SR | SRM | TX | TXU | VA | VALU

EFFECTIVE DATE OF REGISTRATION

MAY 12 2008
(month) (day) (year)

CONTINUATION SHEET RECEIVED

Page 3 of 4 pages

- This Continuation Sheet is used in conjunction with Forms CA, PA, SE, SR, TX, and VA, only. Indicate which basic form you are continuing in the space in the upper right-hand corner.
- If at all possible, try to fit the information called for into the spaces provided on the basic form.
- If you do not have enough space for all the information you need to give on the basic form, use this Continuation Sheet and submit it with the basic form.
- If you submit this Continuation Sheet, clip (do not tape or staple) it to the basic form and fold the two together before submitting them.
- Space A of this sheet is intended to identify the basic application.
Space B is a continuation of Space 2 on the basic application.
Space B is not applicable to Short Forms.
Space C (on the reverse side of this sheet) is for the continuation of Spaces 1, 4, or 6 on the basic application or for the continuation of Space 1 on any of the three Short Forms PA, TX, or VA.

DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

IDENTIFICATION OF CONTINUATION SHEET: This sheet is a continuation of the application for copyright registration on the basic form submitted for the following work.

- TITLE** (Give the title as given under the heading "Title of the Work" in Space 1 of the basic form.)

A
Identification
of
Application

- Chestec.com website
- NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S):** (Give the name and address of at least one copyright claimant as given in Space 4 of the basic form or Space 2 of any of the Short Forms PA, TX, or VA.)

David Allison, 4560 Augusta Drive, Broomfield, CO 80020

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

B
Continuation
of Space 2

- d**
- Was this contribution to the work a "work made for hire"?
 Yes
 No

- AUTHOR'S NATIONALITY OR DOMICILE**
Name of Country
- OR { Citizen of ▶ _____
Domiciled in ▶ _____

- WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK**
- Anonymous? Yes No
Pseudonymous? Yes No
- If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

e

- Was this contribution to the work a "work made for hire"?
 Yes
 No

- AUTHOR'S NATIONALITY OR DOMICILE**
Name of Country
- OR { Citizen of ▶ _____
Domiciled in ▶ _____

- WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK**
- Anonymous? Yes No
Pseudonymous? Yes No
- If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

f

- Was this contribution to the work a "work made for hire"?
 Yes
 No

- AUTHOR'S NATIONALITY OR DOMICILE**
Name of Country
- OR { Citizen of ▶ _____
Domiciled in ▶ _____

- WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK**
- Anonymous? Yes No
Pseudonymous? Yes No
- If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

Use the reverse side of this sheet if you need more space for continuation of Spaces 1, 4, or 6 of the basic form or for the continuation of Space 1 on any of the Short Forms PA, TX, or VA.

CONTINUATION OF (Check which) Space 1 Space 4 Space 6

Fullmetal Alchemist And The Broken Angel (PlayStation 2); Dead To Rights 2 (PlayStation 2, Xbox, PC); FIFA Street (PlayStation, Xbox, GameCube); NARC (PlayStation 2 & Xbox); Jade Empire (Xbox); Star Fox: Assault (GameCube); Kirby: Canvas Curse (Nintendo DS); The Urbz: Sims In The City (Nintendo DS); Rengoku: Tower Of Purgatory (Sony PSP); Tony Hawk's Underground 2 Remix (Sony PSP); Ape Escaper: On The Loose (Sony PSP); Untold Legends: Brotherhood Of The Blade (Sony PSP); and Gretzky NHL (Sony PSP); excluding any third-party banner ads.

C
Continuation
of other
Spaces

Certificate
will be
mailed in
window
envelope
to this
address:

Name ▼
Elizabeth McGosgan Magnuson, c/o Faegre & Benson
Number/Street/Apt ▼
1900 Fifteenth Street
City/State/Zip ▼
Boulder, CO 80302-5414

• Complete all necessary spaces
• Sign your application

1. Attach labels
2. Nonrefundable fee to check for money order payable to Registrar of Copyrights
3. Deposit materials

Library of Congress, Copyright Office
101 Independence Avenue, N.E.
Washington, D.C. 20540-4000

D
For an e-mail
bulletin,
to request
forms, or
for more
information,
visit the
Library of
Congress
Copyright
Office web
site at
www.copyright.gov
(800) 777-0700

Exhibit B

List of Infringing Web Pages

All pages appearing under the section of the domain name directory “<http://www.craveonline.com/games/cheats/ps2/cheat.php/>” including the following Playstation 2 Cheat Codes, which are hyperlinked to the corresponding webpage:

- | | |
|--|---|
| 1. Ace Combat 4: Shattered Skies | 32. Armored Core 2: Another Age |
| 2. Ace Combat 5: The Unsung War | 33. Armored Core 3 |
| 3. Activision Anthology | 34. Armored Core: Nexus |
| 4. Adventures Of Cookie And Cream | 35. Army Men: Air Attack 2 |
| 5. Aero Elite: Combat Academy | 36. Army Men: Green Rogue |
| 6. AFL Live 2003 | 37. Army Men: RTS |
| 7. Age Of Empires 2: The Age Of Kings | 38. Asterix And Obelix: Kick Buttix |
| 8. Aggressive Inline | 39. Astro Boy |
| 9. Air Ranger: Rescue Helicopter | 40. Athens 2004 |
| 10. Air Ranger 2: Rescue Helicopter | 41. ATV Offroad Fury |
| 11. Airblade | 42. ATV Offroad Fury 2 |
| 12. AirForce Delta Strike | 43. ATV Offroad Fury 3 |
| 13. Alias | 44. ATV Quad Power Racing 2 |
| 14. Alien Hominid | 45. Auto Modellista |
| 15. Aliens vs. Predator: Extinction | 46. Adventures Of Cookie And Cream |
| 16. All-Star Baseball 2002 | 47. Backyard Basketball |
| 17. All-Star Baseball 2003 | 48. Backyard Wrestling |
| 18. All-Star Baseball 2004 | 49. Backyard Wrestling 2: There Goes The Neighborhood |
| 19. All-Star Baseball 2005 | 50. Bad Boys 2 |
| 20. All-Star Professional Wrestling | 51. Barbarian |
| 21. All-Star Professional Wrestling 2 | 52. Bass Strike |
| 22. Alpine Racer 3 | 53. Batman: Rise Of Sin Tzu |
| 23. Alter Echo | 54. Batman: Vengeance |
| 24. American Chopper | 55. Battle Engine Aquila |
| 25. Amplitude | 56. Battlestar Galactica |
| 26. Ape Escape 2 | 57. Beyond Good And Evil |
| 27. Ape Escape: Pumped And Primed | 58. Big Mutha Truckers |
| 28. Aqua Aqua | 59. Bionicle |
| 29. Arc The Lad: Twilight Of The Spirits | 60. Black And Bruised |
| 30. Arctic Thunder | 61. Blade 2 |
| 31. Armored Core 2 | 62. Bloody Roar 3 |
| | 63. Bloody Roar 4 |

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| 64. | Blood: The Last Vampire | 104. | Cool Boarders 2001CorvetteCrash |
| 65. | Blood Will Tell | | Bandicoot: The Wrath Of Cortex |
| 66. | BloodRayne | 105. | Crash Nitro Kart |
| 67. | BloodRayne 2 | 106. | Crash Twinsanity |
| 68. | BlowOut | 107. | Crazy Taxi |
| 69. | BMX XXX | 108. | Cricket 2002 |
| 70. | Bombastic | 109. | Crimson Sea 2 |
| 71. | Bomberman Land 2 | 110. | Crimson Tears |
| 72. | Bratz: Formal Funk | 111. | Crouching Tiger, Hidden Dragon |
| 73. | Breath Of Fire 5: Dragon Quarter | 112. | Culdcept |
| 74. | Broken Sword: The Sleeping Dragon | 113. | Curse: The Eye Of Isis |
| 75. | Buffy The Vampire Slayer: Chaos Bleeds | 114. | Cy Girls |
| 76. | Bujingai: The Forsaken City | 115. | Disaster Report |
| 77. | Burnout | 116. | Dakar 2 |
| 78. | Burnout 2: Point Of Impact | 117. | Dance Dance Revolution Extreme |
| 79. | Burnout 3: Takedown | 118. | Dance Dance Revolution: Party Collection |
| 80. | Bombastic | 119. | Dance Summit 2001: Bust-A-Move |
| 81. | Call Of Duty: Finest Hour | 120. | Dancing Stage Fever |
| 82. | Capcom Fighting Evolution | 121. | Dancing Stage MegaMix |
| 83. | Capcom vs. SNK 2: Mark Of The Millennium | 122. | Dark Angel |
| 84. | Carmen Sandiego: The Secret Of The Stolen Drums | 123. | Dark Angel: Vampire Apocalypse |
| 85. | CART Fury: Championship Racing | 124. | Dark Cloud |
| 86. | Casper: Spirit Dimensions | 125. | Dark Cloud 2 |
| 87. | Castlevania: Lament Of Innocence | 126. | Dark Summit |
| 88. | Catwoman | 127. | Dave Mirra Freestyle BMX 2 |
| 89. | ChainDive | 128. | David Beckham Soccer |
| 90. | Champions Of Norrath: Realms Of EverQuest | 129. | DDRMAX: Dance Dance Revolution 6th Mix |
| 91. | Chaos Legion | 130. | DDRMAX2: Dance Dance Revolution 7th Mix |
| 92. | Checkmate | 131. | Dead Or Alive 2 |
| 93. | Chessmaster | 132. | Dead Or Alive 2: Hardcore |
| 94. | City Crisis | 133. | Dead To Rights |
| 95. | Clock Tower 3 | 134. | Deer Hunter |
| 96. | Colin McRae Rally 3 | 135. | Def Jam: Fight For NY |
| 97. | Colin McRae Rally 4 | 136. | Def Jam Vendetta |
| 98. | Commandos 2: Men Of Courage | 137. | Defender |
| 99. | Conflict: Desert Storm | 138. | Delta Force: Urban Warfare |
| 100. | Conflict: Desert Storm 2 - Back To Baghdad | 139. | Destruction Derby Arenas |
| 101. | Conflict: Vietnam | 140. | Deus Ex: The Conspiracy |
| 102. | Conflict Zone | 141. | Devil May Cry |
| 103. | Contra: Shattered Soldier | 142. | Devil May Cry 2 |
| | | 143. | Die Hard: Vendetta |
| | | 144. | Digimon Rumble Arena 2 |
| | | 145. | Digital Devil Saga: Avatar Tuner |

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| 146. | Dino Stalker | 188. | Egg Mania: Eggstreme Madness |
| 147. | Dinosaur | 189. | Endgame |
| 148. | Disaster Report | 190. | Enter The Matrix |
| 149. | Disgaea: Hour Of Darkness | 191. | Ephemeral Fantasia |
| 150. | Disney Golf Classic | 192. | Escape From Monkey Island |
| 151. | D.N.A.: Dark Native Apostle | 193. | ESPN College Hoops 2K5 |
| 152. | DoDonPachi Dai-Oujou | 194. | ESPN International Track And Field |
| 153. | Dog Of Bay | 195. | ESPN International Winter Sports 2002 |
| 154. | Downforce | 196. | ESPN Major League Baseball |
| 155. | Downhill Domination | 197. | ESPN MLS Extra Time |
| 156. | Dr. Muto | 198. | ESPN MLS Extra Time 2002 |
| 157. | Dragon Ball Z: Budokai | 199. | ESPN National Hockey Night |
| 158. | Dragon Ball Z: Budokai 2 | 200. | ESPN NBA 2K5 |
| 159. | Dragon Ball Z: Budokai 3 | 201. | ESPN NBA 2Night |
| 160. | Dragon Quest 5 | 202. | ESPN NBA 2Night 2002 |
| 161. | Dragon Rage | 203. | ESPN NBA Basketball |
| 162. | Drakan: The Ancient Gates | 204. | ESPN NFL 2K5 |
| 163. | Drakengard | 205. | ESPN NFL Football |
| 164. | DreamMix TV: World Fighters | 206. | ESPN NFL Primetime 2002 |
| 165. | DRIV3R | 207. | ESPN NHL 2K5 |
| 166. | Driven | 208. | ESPN NHL Hockey |
| 167. | Driving Emotion Type-S | 209. | ESPN Winter X Games Snowboarding |
| 168. | Drome Racers | 210. | ESPN Winter X Games Snowboarding 2002 |
| 169. | Dropship | 211. | ESPN X Games Skateboarding |
| 170. | DrumMania | 212. | Eternal Quest |
| 171. | Dual Hearts | 213. | Eternal Ring |
| 172. | Duel Masters: Cobalt | 214. | Eve Of Extinction |
| 173. | Dynasty Tactics | 215. | Everblue |
| 174. | Dynasty Tactics 2 | 216. | Everblue 2 |
| 175. | Dynasty Warriors 2 | 217. | Evergrace |
| 176. | Dynasty Warriors 2 | 218. | EverQuest Online Adventures |
| 177. | Dynasty Warriors 3 | 219. | EverQuest Online Adventures: Frontiers |
| 178. | Dynasty Warriors 3: Xtreme Legends | 220. | Evil Dead: A Fistful Of Boomstick |
| 179. | Dynasty Warriors 4 | 221. | Evil Twin |
| 180. | Dynasty Warriors 4: Empires | 222. | Evolution Skateboarding |
| 181. | Dynasty Warriors 4: Xtreme Legends | 223. | Extermination |
| 182. | Dynasty Warriors 2 | 224. | Extreme G3 |
| 183. | Dynasty Warriors 3 | 225. | Eye Toy |
| 184. | Dynasty Warriors 3: Xtreme Legends | 226. | Eye Toy: AntiGrav |
| 185. | Disaster Report | 227. | Eye Toy: Groove |
| 186. | Ecco The Dolphin: Defender Of The Future | 228. | Forgotten Realms: Demon Stone |
| 187. | Echo Night: Beyond | | |

229. [F1 2001](#)
230. [F1 2002](#)
231. [F1 Career Challenge](#)
232. [F1 Championship Season 2000](#)
233. [Fairly OddParents: Shadow Showdown](#)
234. [Fallout: Brotherhood Of Steel](#)
235. [Fantavision](#)
236. [Fatal Frame](#)
237. [FIFA 2001: Major League Soccer](#)
238. [FIFA 2002: Major League Soccer](#)
239. [FIFA 2003](#)
240. [FIFA 2004](#)
241. [FIFA 2005](#)
242. [Final Fantasy 10](#)
243. [Final Fantasy 11](#)
244. [Final Fantasy 11: Chains Of Promathia](#)
245. [Final Fantasy X-2](#)
246. [Formula One 2001](#)
247. [Formula One 2002](#)
248. [Freestyle Street Soccer](#)
249. [Frogger: The Great Quest](#)
250. [Front Mission 4](#)
251. [Fugitive Hunter](#)
252. [Full Metal Alchemist](#)
253. [Full Metal Alchemist: Dream Carnival](#)
254. [Futurama](#)
255. [Future Tactics: The Uprising](#)
256. [Grand Theft Auto 3](#)
257. [Grand Theft Auto: San Andreas](#)
258. [Grand Theft Auto: Vice City](#)
259. [Grandia 2](#)
260. [Grandia Xtreme](#)
261. [Gun Griffon Blaze](#)
262. [Gumball 3000](#)
263. [Hard Hitter Tennis](#)
264. [Half-Life](#)
265. [Hard Hitter Tennis](#)
266. [Harry Potter And The Chamber Of Secrets](#)
267. [Harry Potter And The Prisoner Of Azkaban](#)
268. [Harry Potter: Quidditch World Cup](#)
269. [Harvest Moon: Save The Homeland](#)
270. [Haven: Call Of The King](#)
271. [Headhunter](#)
272. [Headhunter: Redemption](#)
273. [High Heat Major League Baseball 2002](#)
274. [High Heat Major League Baseball 2003](#)
275. [High Heat Major League Baseball 2004](#)
276. [High Rollers Casino](#)
277. [Hitman 2: Silent Assassin](#)
278. [Hitman: Contracts](#)
279. [Ico](#)
280. [IHRA Professional Drag Racing 2005](#)
281. [Ikuze! Onsen Takkyuu!!](#)
282. [IndyCar Series](#)
283. [I-Ninja](#)
284. [Initial D Special Stage](#)
285. [Intellivision Lives!](#)
286. [Inuyasha: The Secret Of The Cursed Mask](#)
287. [International Superstar Soccer 3](#)
288. [International Superstar Soccer 2](#)
289. [International League Soccer](#)
290. [Intellivision Lives!](#)
291. [James Bond 007: Everything Or Nothing](#)
292. [James Bond 007: Agent Under Fire](#)
293. [James Bond 007: NightFire](#)
294. [Jade Cocoon 2](#)
295. [Jak And Daxter: The Precursor Legacy](#)
296. [Jak 2](#)
297. [Jak 3](#)
298. [Jet X20](#)
299. [Jikkyou World Soccer 2000](#)
300. [Jimmy Neutron Boy Genius](#)
301. [Jonny Moseley Mad Trix](#)
302. [Judge Dredd: Dredd Versus Death](#)
303. [Juiced](#)
304. [Jurassic Park: Operation Genesis](#)
305. [King Of Fighters 2000](#)
306. [King Of Fighters 2000/2001](#)

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| 307. | <u>King Of Fighters 2002</u> | 347. | <u>Max Payne 2: The Fall Of Max Payne</u> |
| 308. | <u>King Of Fighters 2003</u> | 348. | <u>Maximo: Ghosts To Glory</u> |
| 309. | <u>King Of Fighters: Maximum Impact</u> | 349. | <u>Maximo vs. Army Of Zin</u> |
| 310. | <u>King Of Route 66</u> | 350. | <u>MDK 2: Armageddon</u> |
| 311. | <u>Kingdom Hearts</u> | 351. | <u>Medal Of Honor: Frontline</u> |
| 312. | <u>Knight Rider</u> | 352. | <u>Medal Of Honor: Rising Sun</u> |
| 313. | <u>Knights Of The Temple: Infernal Crusade</u> | 353. | <u>Megaman Anniversary Collection</u> |
| 314. | <u>Knockout Kings 2001</u> <u>Knockout Kings 2002</u> <u>Kya: Dark Lineage</u> | 354. | <u>Megaman X: Command Mission</u> |
| 315. | <u>Legacy Of Kain: Blood Omen 2</u> | 355. | <u>Megaman X7</u> |
| 316. | <u>LMA Manager 2004</u> | 356. | <u>Megaman X8</u> |
| 317. | <u>Looney Tunes: Back In Action</u> | 357. | <u>Men In Black 2: Alien Escape</u> |
| 318. | <u>LowRider</u> | 358. | <u>Metal Arms: Glitch In The System</u> |
| 319. | <u>Leisure Suit Larry: Magna Cum Laude</u> | 359. | <u>Metal Gear Solid 2: Sons Of Liberty</u> |
| 320. | <u>Legends Of Wrestling</u> | 360. | <u>Metal Gear Solid 2: Substance</u> |
| 321. | <u>Legends Of Wrestling 2</u> | 361. | <u>Metal Gear Solid 3: Snake Eater</u> |
| 322. | <u>Lupin The Third: Treasure Of The Sorceror King</u> | 362. | <u>Metal Slug 3</u> |
| 323. | <u>Love * Upper!</u> | 363. | <u>Metropolismania</u> |
| 324. | <u>Love * Smash! 5</u> | 364. | <u>Micro Machines</u> |
| 325. | <u>Love * Ping Pong!</u> | 365. | <u>Midnight Club: Street Racing</u> |
| 326. | <u>Lotus Challenge</u> | 366. | <u>Midnight Club 2</u> |
| 327. | <u>LifeLine</u> | 367. | <u>Midway Arcade Treasures</u> |
| 328. | <u>Lethal Skies 2</u> | 368. | <u>Midway Arcade Treasures 2</u> |
| 329. | <u>Lethal Skies: Elite Pilot - Team SW</u> | 369. | <u>Mike Tyson Heavyweight Boxing</u> |
| 330. | <u>Lemony Snicket: A Series Of Unfortunate Events</u> | 370. | <u>Minna No Golf 4</u> |
| 331. | <u>Lego Racers 2</u> | 371. | <u>Minority Report</u> |
| 332. | <u>Legion: The Legend Of Excalibur</u> | 372. | <u>Mission: Impossible - Operation Surma</u> |
| 333. | <u>Mace Griffin: Bounty Hunter</u> | 373. | <u>Mister Mosquito</u> |
| 334. | <u>Mad Maestro!</u> | 374. | <u>MLB 2004</u> |
| 335. | <u>Madden NFL 2001</u> | 375. | <u>MLB 2005</u> |
| 336. | <u>Madden NFL 2002</u> | 376. | <u>MLB SlugFest 2003</u> |
| 337. | <u>Madden NFL 2003</u> | 377. | <u>MLB SlugFest 2004</u> |
| 338. | <u>Madden NFL 2004</u> | 378. | <u>MLB SlugFest: Loaded</u> |
| 339. | <u>Madden NFL 2005</u> | 379. | <u>Mobile Light Force 2</u> |
| 340. | <u>Mafia</u> | 380. | <u>Mobile Light Force 2</u> |
| 341. | <u>Magic Pengel: The Quest For Color</u> | 381. | <u>Mobile Suit Gundam: Encounters In Space</u> |
| 342. | <u>Malice</u> | 382. | <u>Mobile Suit Gundam: Federation vs. Zeon</u> |
| 343. | <u>Manhunt</u> | 383. | <u>Mobile Suit Gundam: Journey To Jaburo</u> |
| 344. | <u>Marvel vs. Capcom 2</u> | 384. | <u>Mobile Suit Gundam Seed: Never Ending Tomorrow</u> |
| 345. | <u>Mashed</u> | 385. | <u>Mobile Suit Gundam: Zeonic Front</u> |
| 346. | <u>Max Payne</u> | | |

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|------|---|------|---|
| 386. | Mobile Suit Gundam Z: AEUG vs. Titans | 426. | NASCAR Heat 2002 |
| 387. | Mojib-Ribbon | 427. | NASCAR Thunder 2002 |
| 388. | Mojo! | 428. | NASCAR Thunder 2003 |
| 389. | Monopoly Party | 429. | NASCAR Thunder 2004 |
| 390. | Monster 4x4: Masters Of Metal | 430. | Naval Ops: Commander |
| 391. | Monster Hunter | 431. | Naval Ops: Warship Gunner |
| 392. | Monster Jam: Maximum Destruction | 432. | NBA 2K2 |
| 393. | Monster Rancher 3 | 433. | NBA 2K3 |
| 394. | Monster Rancher 4 | 434. | NBA Ballers |
| 395. | Monsters, Inc. | 435. | NBA Hoopz |
| 396. | Mortal Kombat: Deadly Alliance | 436. | NBA Live 2001 |
| 397. | Mortal Kombat: Deception | 437. | NBA Live 2002 |
| 398. | Moto GP | 438. | NBA Live 2003 |
| 399. | Moto GP 2 | 439. | NBA Live 2004 |
| 400. | Moto GP 3 | 440. | NBA Live 2005 |
| 401. | Motor Mayhem | 441. | NBA Jam 2004 |
| 402. | MTV Music Generator 2 | 442. | NBA ShootOut 2001 |
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| 212. Midtown Madness 3 | 256. NCAA March Madness 2004 |
| 213. Midway Arcade Treasures | 257. NCAA March Madness 2005 |
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| 215. Mike Tyson Heavyweight Boxing | 259. Need For Speed: Underground |
| 216. Minority Report | 260. Need For Speed: Underground 2 |
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| 219. MLB SlugFest 2004 | 264. NFL Blitz 2003 |
| 220. MLB SlugFest: Loaded | 265. NFL Blitz Pro |
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| 222. Monopoly Party | 267. NFL Fever 2003 |
| 223. Monster Garage | 268. NFL Fever 2004 |
| 224. Mortal Kombat: Deadly Alliance | 269. NFL Street |
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| 284. | Otogi 2: Immortal Warriors | 328. | Star Wars: Jedi Outcast - Jedi Knight 2 |
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| 286. | Outlaw Golf 2 | 330. | Samurai Warriors |
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| 291. | Phantom Crash | 335. | Second Sight |
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Triple Play Baseball

(Last updated: February 3, 2002)



- Infinite creation points

Create a player and enter "Ichiro" as a name. -From: CRU522@aol.com

- Homerun sounds

While running around the bases after hitting a homerun, press Triangle to hear a soft horn, Square to hear a loud horn, or Circle to hear a whistle.



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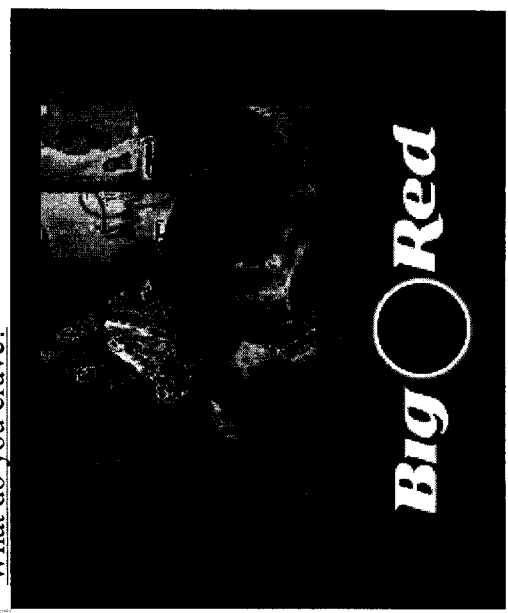


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Waiter!
Rating: 0%

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Triple Play Baseball

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Create a player and enter "Ichiro" as a name. -From: CRU522@aol.com

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While running around the bases after hitting a homerun, press Triangle to hear a soft horn, Square to hear a loud horn, or Circle to hear a whistle.

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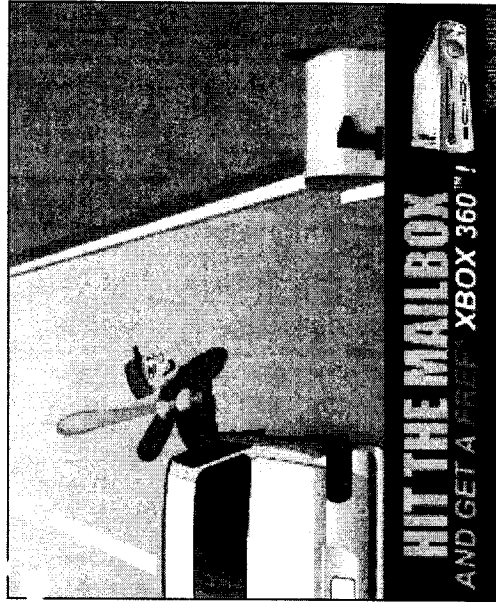
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Jet X20

(Last updated: March 28, 2003)



- Quick start

When "Go!" appears during the pre-race countdown, hold X + Square and press Left Analog-stick Down.

Game Shark Codes



Master Code (Must Be On)	0E3C7DF2 1853E59E EE81128A BCC67F9A
Boost Never Decreases	DE8AA436 BF899B8B DE8AA432 BCA99B83 DE8A9BB6 BF899B8B DE8A9BB2 BCA99B83
Ride Through Walls	DE88980E BF899B8B DE88980A BCA99B83
Disable A.I.	DE98B262 BCA99B83
Big Waves	DE938A8A FD499B83
No Waves	DE938A8A BCA99B83
Turbo Waves	DE94A14E 7B999B83
Waves Don't Move	DE94A14E BCA99B83
More Lift When Jumping	DE938A5A 10719B83



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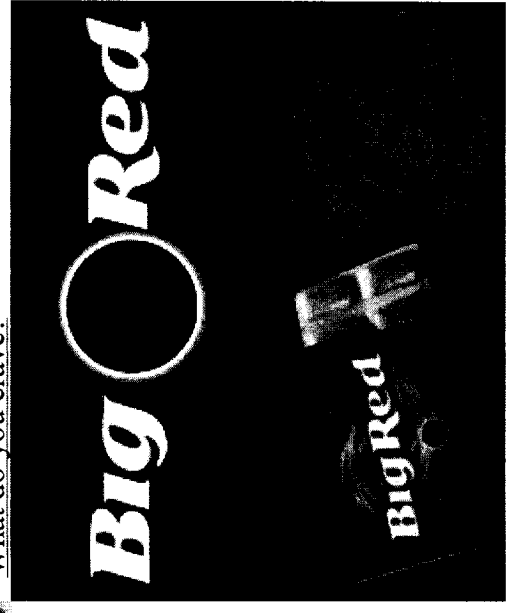


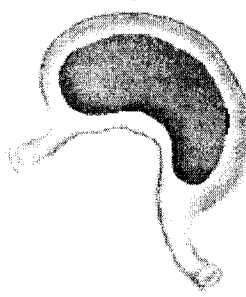
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F
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 Waiter!
 Rating: 0%



What do you think?
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Jet X20

Friday, December 17, 2004 Posted: 12:00 AM PT



Quick start

When "Go!" appears during the pre-race countdown, hold X + Square and press Left Analog-stick Down.

Game Shark Codes

- Master Code (Must Be On)0E3C7DF2 1853E59EEE81128A BCC67F9A
- Boost Never DecreasesDE8AA436 BF899B8BDE8AA432 BCA99B83DE8A9BB6 BF899B8BDE8A9BB2 BCA99B83
- Ride Through WallsDE88980E BF899B8BDE88980A BCA99B83
- Disable A.I.DE98B262 BCA99B83
- Big WavesDE938A8A FD499B83
- No WavesDE938A8A BCA99B83
- Turbo WavesDE94A14E 7B999B83
- Waves Dont MoveDE94A14E BCA99B83
- More Lift When JumpingDE938A5A 10719B83

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Arctic Thunder

(Last updated: October 19, 2001)



- No drones mode

At the screen after startup (before choosing a player), press Square(2), Circle(2), L1, R1, Start. **Note:** This has no effect in point races.

- Expert mode

At the screen after startup (before choosing a player), press Circle, Square, Circle(2), Square, Start. **Note:** This

has no effect in point races.

- All Randoms mode

At the screen after startup (before choosing a player), press R1, R2, Square, Circle, R1, R2, Start. **Note:** This has no effect in point races.

- All Atomic Snowballs mode

At the screen after startup (before choosing a player), press Square(3), L1, Circle, Start. **Note:** This has no effect in point races.

- All Grappling Hooks and Randoms mode

At the screen after startup (before choosing a player), press Circle(2), L2, Circle(2), L1, Start. **Note:** This has no effect in point races.

- All Rooster Tails mode

At the screen after startup (before choosing a player), press R1, R2, L2, L1, Square, Start. **Note:** This has no effect in point races.

- All Snow Bombs and Randoms mode

At the screen after startup (before choosing a player), press Circle(2), R1, R2, Start. **Note:** This has no effect in point races.

- All Boost mode

At the screen after startup (before choosing a player), press Circle, R1(2), Circle, R2, Start. **Note:** This has no effect in point races.

- Clone mode

At the screen after startup (before choosing a player), press L1, L2(2), Circle, L1, Circle, Start. **Note:** This has no effect in points races.

• Everyone invisible mode
At the screen after startup (before choosing a player), press Square, Circle, Square, R2, Circle(2), Start. **Note:** This has no effect in points races.

• No power-ups mode

At the screen after startup (before choosing a player), press Square(2), Circle, Square, R2, Square, Start. **Note:** This has no effect in points races.

• Super boost wheelie mode

At the screen after startup (before choosing a player), press Circle, L1, Square, R2, Square, L2, Start. **Note:** This has no effect in points races.



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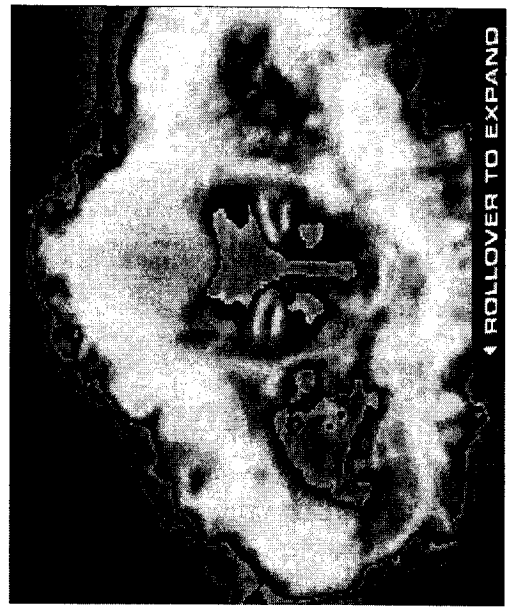


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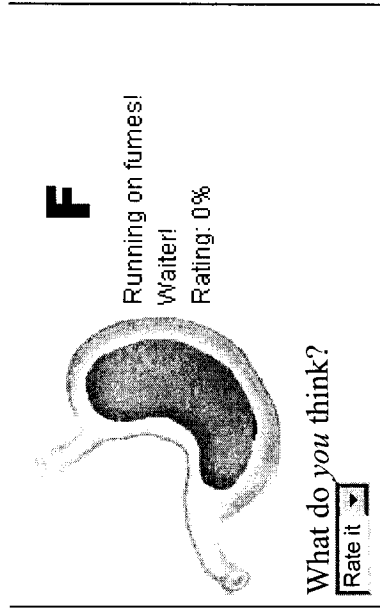
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Arctic Thunder

Thursday, December 16, 2004 Posted: 12:00 AM PT



No drones mode

At the screen after startup (before choosing a player), press Square(2), Circle(2), L1, R1, Start. Note: This has no effect in point races.

Expert mode

At the screen after startup (before choosing a player), press Circle, Square, Circle(2), Square, Start. Note: This has no effect in point races.

All Randoms mode

At the screen after startup (before choosing a player), press R1, R2, Square, Circle, R1, R2, Start. Note: This has no effect in point races.

All Atomic Snowballs mode

At the screen after startup (before choosing a player), press Square(3), L1, Circle, Start. Note: This has no effect in point races.

All Grappling Hooks and Randoms mode

At the screen after startup (before choosing a player), press Circle(2), L2, Circle(2), L1, Start. Note: This has no effect in point races.

All Rooster Tails mode

At the screen after startup (before choosing a player), press R1, R2, L2, L1, Square, Start. Note: This has no effect in point races.

All Snow Bombs and Randoms mode

At the screen after startup (before choosing a player), press Circle(2), R1, R2, Start. Note: This has no effect in point races.

All Boost mode

At the screen after startup (before choosing a player), press Circle, R1(2), Circle, R2, Start. Note: This has no effect in point races.

Clone mode

At the screen after startup (before choosing a player), press L1, L2(2), Circle, L1, Circle, Start. Note: This has no effect in points races.

Everyone invisible mode

At the screen after startup (before choosing a player), press Square, Circle, Square, R2, Circle(2), Start. Note: This has no effect in points races.

No power-ups mode

At the screen after startup (before choosing a player), press Square(2), Circle, Square, R2, Square, Start. Note: This has no effect in points races.

Super boost wheelie mode

At the screen after startup (before choosing a player), press Circle, L1, Square, R2, Square, L2, Start. Note: This has no effect in points races.

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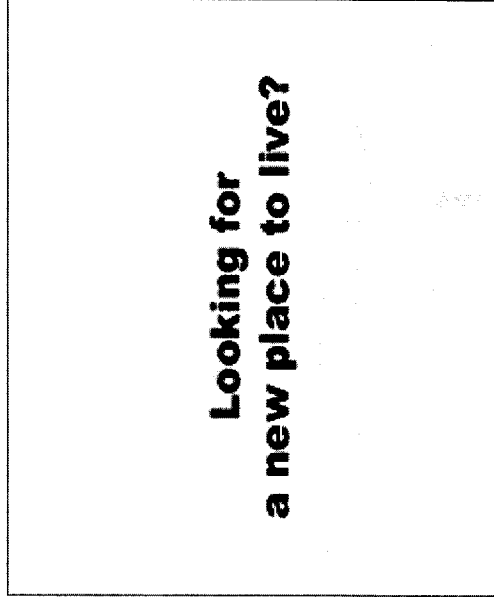
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Commandos 2: Men Of Courage

(Last updated: October 14, 2002)





- Bonus missions

Collect all brown bonus books during a mission to complete the photograph at the end and unlock a bonus mission. **Note:** The "Saving Private Smith" mission has not associated a bonus mission.



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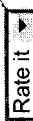
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Commandos 2: Men Of Courage

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Bonus missions

Collect all brown bonus books during a mission to complete the photograph at the end and unlock a bonus mission. Note: The "Saving Private Smith" mission has not associated a bonus mission.

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ESPN NBA 2Night 2002

(Last updated: May 8, 2002)



- Better performance

Enter "ABILITYBONUS" as a case-sensitive code at the "Cheat" screen under the options menu.

- Better shooting

Enter "EXCELLENT" as a case-sensitive code at the "Cheat" screen under the options menu.

- Easy dunks

Enter "**DUNKERS**" as a case-sensitive code at the "Cheat" screen under the options menu.

- Basketball heads

Enter "**BALLHEAD**" as a case-sensitive code at the "Cheat" screen under the options menu.

- Big heads

Enter "**BIGHEAD**" as a case-sensitive code at the "Cheat" screen under the options menu.

- Big feet

Enter "**BIGFOOT**" as a case-sensitive code at the "Cheat" screen under the options menu.

- Big hands

Enter "**BIGHAND**" as a case-sensitive code at the "Cheat" screen under the options menu.

- Small players

Enter "**MINIMINI**" as a case-sensitive code at the "Cheat" screen under the options menu.

- Flat players

Enter "**PANCAKE**" as a case-sensitive code at the "Cheat" screen under the options menu.

- Invisible players

Enter "**INVISIBLE**" as a case-sensitive code at the "Cheat" screen under the options menu.

- Show ball trails

Enter "**BEFOREIMAGE**" as a case-sensitive code at the "Cheat" screen under the options menu.

- No spectators

Enter "NOSPECTATOR" as a case-sensitive code at the "Cheat" screen under the options menu.

- No overhead lights

Enter "DARKNESS" as a case-sensitive code at the "Cheat" screen under the options menu.



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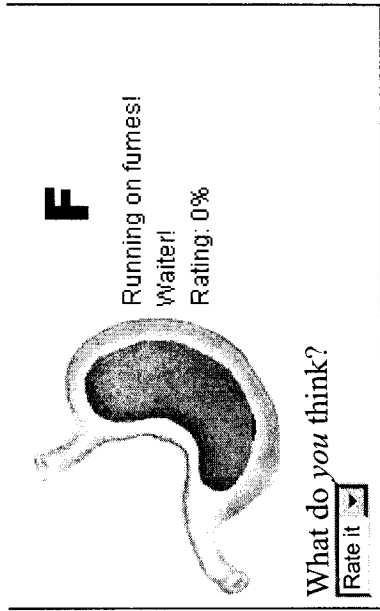
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XBOX

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Better performance

Enter "ABILITYBONUS" as a case-sensitive code at the "Cheat" screen under the options menu.

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Enter "EXCELLENT" as a case-sensitive code at the "Cheat" screen under the options menu.

Easy dunks

Enter "DUNKERS" as a case-sensitive code at the "Cheat" screen under the options menu.

Basketball heads

Enter "BALLHEAD" as a case-sensitive code at the "Cheat" screen under the options menu.

Big heads

Enter "BIGHEAD" as a case-sensitive code at the "Cheat" screen under the options menu.

Big feet

Enter "BIGFOOT" as a case-sensitive code at the "Cheat" screen under the options menu.

Big hands

Enter "BIGHAND" as a case-sensitive code at the "Cheat" screen under the options menu.

Small players

Enter "MINIMINI" as a case-sensitive code at the "Cheat" screen under the options menu.

Flat players

Enter "PANCAKE" as a case-sensitive code at the "Cheat" screen under the options menu.

Invisible players

Enter "INVISIBLE" as a case-sensitive code at the "Cheat" screen under the options menu.

Show ball trails

Enter "BEFOREIMAGE" as a case-sensitive code at the "Cheat" screen under the options menu.

No spectators

Enter "NOSPECTATOR" as a case-sensitive code at the "Cheat" screen under the options menu.

No overhead lights

Enter "DARKNESS" as a case-sensitive code at the "Cheat" screen under the options menu.

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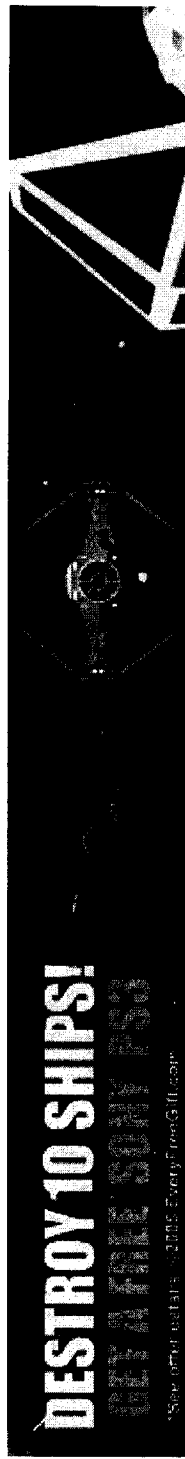
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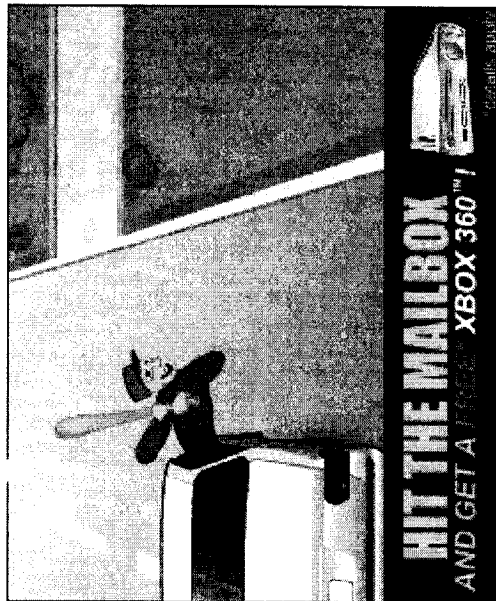
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NCAA College Basketball 2K3

(Last updated: January 17, 2003)



- Aliases


The following colleges have their identities altered in the game:

College	Alias
Alcorn State	Jackson South
California Polytechnic	California Coastside

Charleston Southern	Charleston State
Denver	Central Colorado State
Gardner-Webb College	(none)
Grambling State	Ouachita State
Hampton	State University of Virginia
Howard	Washington College
IPFW	NC College
Lipscomb	Tennessee College
Loyola-Chicago	Loyola (Illinois)
Loyola-Maryland	Maryland College
Manhattan	Manhattan State
Morris Brown	Atlanta College
Nicholls State	Fontainebleu University
Northwestern Louisiana	Northwestern State
Oakland (MI)	Oakland Union College
Prairie View A&M	Houston College
Sacramento State	Central California
Sacred Heart	Bridgeport Tech
Savannah State	South Georgia State
St. Francis (NY)	New York College
St. Peter's	Garden State College
Texas Southern	South Texas
UC Santa Barbara	SB Del Mar State
UNC-Asheville	NC A&M





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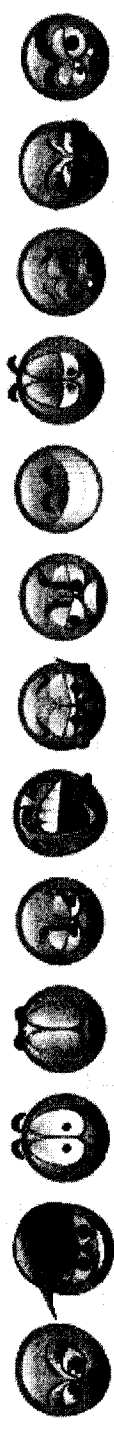
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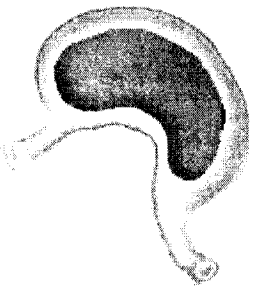
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X **NCAA College Basketball 2K3**
 XBOX

Thursday, December 16, 2004 Posted: 12:00 AM PT



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- Gardner-Webb College(none)
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- HamptonState University of Virginia
- HowardWashington College
- IPFWNC College
- LipscombTennessee College
- Loyola-ChicagoLoyola (Illinois)
- Loyola-MarylandMaryland College
- ManhattanManhattan State
- Morris BrownAtlanta College
- Nicholls StateFontainebleu University
- Northwestern LouisianaNorthwestern State
- Oakland (MI)Oakland Union College

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Prairie View A&MHouston College
Sacramento StateCentral California
Sacred HeartBridgeport Tech
Savannah StateSouth Georgia State
St. Francis (NY)New York College
St. PetersGarden State College
Texas SouthernSouth Texas
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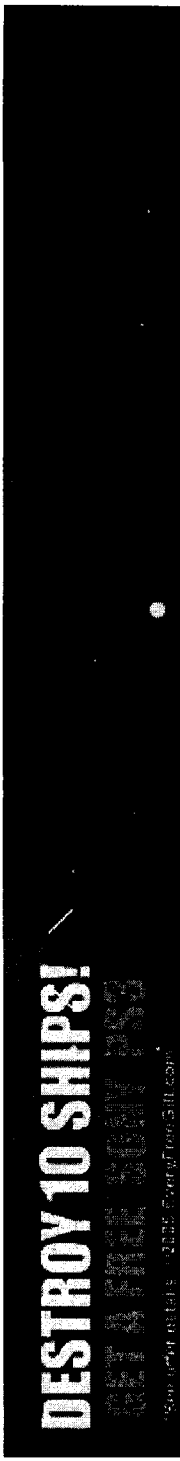
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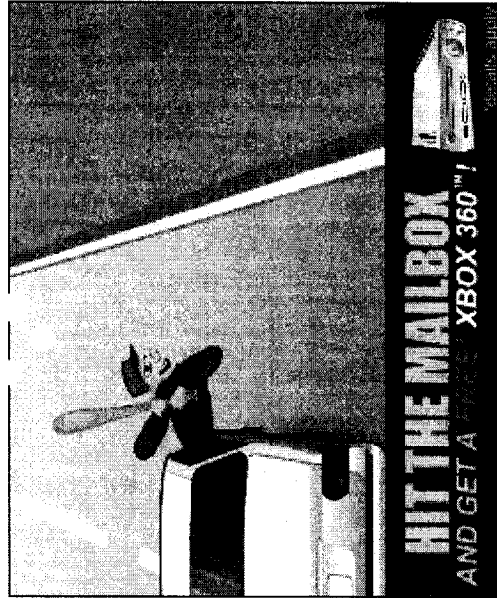
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SNK vs. Capcom: SVC Chaos

(Last updated: November 17, 2004)



- Play as Dan

At the title screen, hold Start and press Down, Left(7), then any button to unlock Dan.

- Play as Demitri

At the title screen, hold Start and press Right(3), Left, Up, Right, Down, Up, then any button to unlock Demitri.

- Play as Evil Iori

At the title screen, hold Start and press Up(3), Down, Left, Right, Down, Left to unlock Evil Iori.

- Play as Geese

At the title screen, hold Start and press Left(3), Down, Left, Up, Right, Up to unlock Geese.

- Play as Goenitz

At the title screen, hold Start and press Down(3), Right, Down, Left(3) to unlock Goenitz.

- Play as Mars Alien

At the title screen, hold Start and press Up, Down, Right(3), Up, Down, Left(2), Down, then any button to unlock Mars Alien.

- Play as Red Demon

Enter survival mode. Defeat the opponents until you face the Red Demon. Defeat him to unlock him as a selectable character in all modes. To choose the Red Demon, highlight Tabasa at the character selection screen, then hold R and press X, Y, A or B. **Note:** The Red Demon is one of the best fighters in the game.

- Play as Shin Mr.Karate

At the character selection screen, highlight Kasumi, then hold R.

- Play as Super Akuma/Shin Gouki

At the character selection screen, highlight Balrog, then hold R.

- Play as Violent Ken

At the title screen, hold Start and press Up(2), Down, Left(2), Right, Left, Up, then any button to unlock Violent Ken.

- Play as Young Athena

Enter survival mode. Defeat the opponents until you face Athena. Defeat her to unlock her as a selectable character in all modes. To choose Young Athena, highlight Genjuro at the character selection screen, then hold R and press X, Y, A or B. **Note:** Athena is one of the best fighters in the game.

- Play as Zero

At the title screen, hold Start and press Up, Right(2), Left(2), Down, Up(3), then any button to unlock Zero.

- Art Gallery

Successfully complete the game in survival mode by defeating 36 fighters to unlock the "Art Gallery" option.


- Hidden characters

Alternately, you can access all the hidden characters except Red Demon and Young Athena on the character selection screen by holding R over the four top characters of the inner most rows of both sides. The following characters can be accessed by holding R while on the standard character's location at the selection screen:


Kyo: Geese
 Terry: Mars People
 Ryo: Goenitz
 Kim: Evil Iori
 Kasumi: Shin Mr. Karate
 Ryu: Zero
 Chun Li: Demitri
 Dhalsim: DaN
 M. Bison: Violent Ken
 Vega: Shin Akuma


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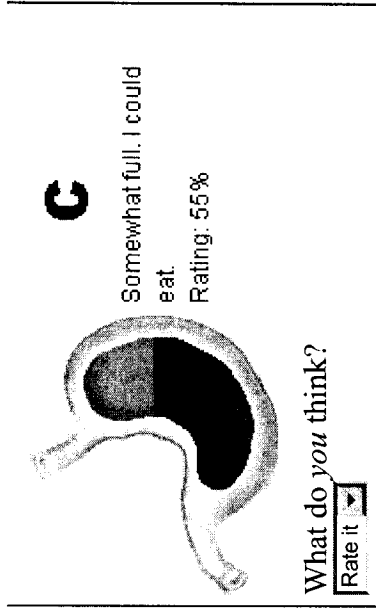
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XBOX SNK vs. Capcom: SVC Chaos

Thursday, December 16, 2004 Posted: 12:00 AM PT



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At the title screen, hold Start and press Left(3), Down, Left, Up, Right, Up to unlock Geese.

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At the title screen, hold Start and press Down(3), Right, Down, Left(3) to unlock Goenitz.

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Ryo: Goenitz
Kim: Evil Iori
Kasumi: Shin Mr. Karate
Ryu: Zero
Chun Li: Demitri
Dhalsim: DaN
M. Bison: Violent Ken
Vega: Shin Akuma

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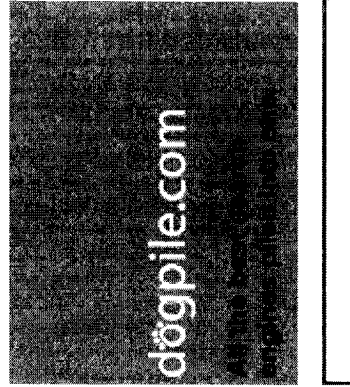
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Star Wars: Battlefront

(Last updated: November 17, 2004)



Strategy Guide

- All planets
- Baby Wars mode

Select the Historical Campaigns, then at the planet selection screen for Galactic Civil War or Clone Wars, press X, Y, X, Y to unlock all planets for that particular era.

Enter "**Jub Jub**" as a case-sensitive profile name. All the models in the game will use the Ewok skeleton and turn the game into "Baby Wars". All infantry units will be half their normal size, and their head seems to be much closer to their shoulders. **Note:** First person view remains the same height.

- Infinite health or ammunition

Stand, crouch, or lay near any one of the replenishment depots. Camp there with a sniper rifle and keep firing.

- Instant action missions

Successfully complete a mission in historical campaign mode to unlock the same mission in instant action mode.

- Naboo Bacta Tanks

In Galactic Conquest, the Naboo Bacta Tanks are very effective when used by the CIS. The Droidekas will regain most of their health while their shields are up, making them even more difficult for opponents to destroy.

- Recon Droid

The sniper's Recon Droid has a self-destruct mode. When you press L, a timer begins. This is an effective means of taking out strategic turrets. This works best when you begin the countdown before you arrive at your target.

- Ordering an advance

First, get the biggest group possible to follow you. Lead them into where you want them to advance from. Then, order them to hold position. Next, get rid of all your explosives by firing them at the enemy. When the enemy pulls back, order your troops to follow you, and lead them head onto the enemy. **Note:** This cannot be done with droids.

- Bomb run

Select any level as either the Empire or the Republic. They both have a person with a jetpack. Spawn anywhere with a jetpack character. Wait for your jetpack to fully charge. When you are ready, jump into the air and start throwing grenades wherever a big cluster of enemies are found. This trick works better for the Republic Jet Trooper, because he can hover instead of jumping high and he has more grenades. For example, if you are a Republic Jet Trooper, jump in the air, then go forward while throwing grenades repeatedly; or hover in one location and focus a few or all your grenades in one location. Also, if a grenade hits an enemy, it will hurt their health.

- Sniping location

When playing as the Rebel side in Galactic Conquest, start as a Rebel Marksman and get a X-Wing fighter. Fly to where the Imperials have the open TIE fighters and get one. Fly to any tall stone pillar and land on it. Hop out and start taking people out with your sniper rifle. This works best as a Rebel marksman because you can zoom in twice.

- Killing Droidekas

A Droideka is usually difficult to defeat with its shields up. If one is rolling, run directly next to it. When it puts its shields up, stand in front of it, almost in the shield. The way the blasters are set up, the game glitches and will not let it shoot you because you are between them. This also works with the shields off.

- Killing Jedis

Killing a Jedi is difficult. Get a vehicle that is able to fly. Go to the enemy Jedi and wait until he stands still. Then, land on top of him. He will respawn. Do this as many times as desired.

- Killing Tusken Raiders

Steal Rebel tank and go to a Tusken camp. Sit there with the turret gun and kill them. Do not use the cannon or they will know that you are there.

- Destroying AT-ATs in Battle Of Hoth (Galactic Civil War)

Choose the pilot, and get into a Snow Speeder. Find another infantryman and get him into the copilot seat. When you fly to an AT-AT, pull back the Right Analog-stick and start circling it, while trying to stay low to avoid its laser cannons. Eventually your copilot will shoot the towing cable at its legs. Continue circling for about four times around, and it will explode. Also, always attack the AT-AT in the back to avoid laser cannon fire from the other vehicle. Another way to defeat the walkers is to take control of the Snowspeeder as the pilot. When you get near the walkers, switch places so that you are in control of firing the tow cable. When the cable is attached, the CPU pilot in the speeder with you will complete the final wrap around.

- Defend against Snowspeeders in Battle Of Hoth (Galactic Civil War)

To defend your AT-ATs against Snowspeeders, simply move them close together. To wrap around the AT-AT's legs, a Snowspeeder must get close. The second AT-AT next to you will keep them farther away. Also, two AT-ATs can rip apart enemy lines better the one.

- Art and photo gallery

Win the indicated mission to unlock the corresponding entry in the gallery:

Bespin Concept Art: Bespin - The Liberation of Cloud City (Historical Campaigns: Galactic Civil War)
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 Star Wars Battlefront Art: Kashyyyk - Aggressive Negotiations (Historical Campaigns: Clone Wars)
 Tatooine Concept Art: Tatooine - Siege Of Mos Eisley (Historical Campaigns: Galactic Civil War)
 Weapons and Units Stills: Rhen Var - Mountaintop Defenses (Historical Campaigns: Clone Wars)
 Yavin Concept Art: Yavin 4 - The Fall of Yavin 4 (Historical Campaigns: Galactic Civil War)

- Alternate costumes for the Rebels and Imperials

In some maps, the characters use different clothing to match their environment. The following is a list of alternate costumes that can be seen:

Imperial Pilot: Hoth pilot suit (Hoth map), Imperial Commando uniform (both Yavin and Kashyyyk maps, Tatooine: Mos Eisley map, and Endor map).

Rebel Marksman: Hoth camo (Hoth map), urban camo (both Bespin maps).

Rebel Pilot: None.

Rebel Trooper: Hoth uniform (Hoth map), urban camo (both Bespin maps).

Rebel Vanguard: Hoth uniform (Hoth map)



Stormtrooper, Shocktrooper, and Scoutrooper: Snowtrooper armor (Hoth map).

Wookie Smuggler: Snow covered fur (Hoth map).



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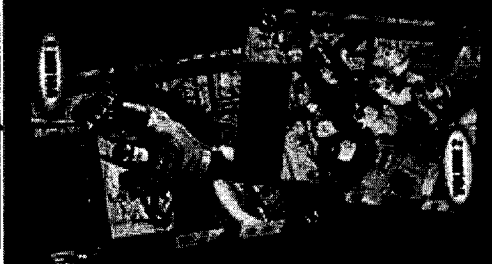


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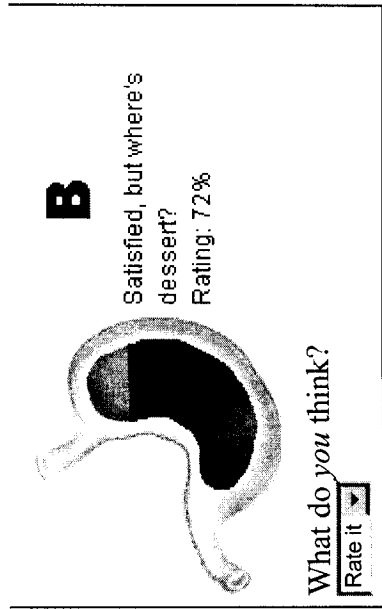
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X Star Wars: Battlefront

Thursday, December 16, 2004 Posted: 12:00 AM PT



Strategy Guide

All planets

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Alternate costumes for the Rebels and Imperials

In some maps, the characters use different clothing to match their environment. The following a list of alternate costumes that can be seen:

Imperial Pilot: Hoth pilot suit (Hoth map), Imperial Commando uniform (both Yavin and Kashyyyk maps, Tatooine: Mos Eisley map, and Endor map).

Rebel Marksman: Hoth camo (Hoth map), urban camo (both Bespin maps).

Rebel Pilot: None.

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Rebel Trooper: Hoth uniform (Hoth map), urban camo (both Bespin maps).

Rebel Vanguard: Hoth uniform (Hoth map)

Stormtrooper, Shocktrooper, and Scoutrooper: Snowtrooper armor (Hoth map).

Wookie Smuggler: Snow covered fur (Hoth map).

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- Ending bonuses

Successfully complete the game to unlock the Free Run mode (no vehicles on the road), Free Run Twin mode (two player Free Run), and "Credits" options.



Burnout

(Last updated: June 27, 2002)



Strategy Guide

- Face off mode

Successfully complete championship mode once to unlock face off mode against the Roadster.

- Bus

Defeat the bus in Face Off 4 to unlock it.

- Roadster

Defeat the Roadster in Face Off mode to unlock it and another face off race against another car.

- Saloon GT

Defeat the Saloon GT in Face Off 3 to unlock it.

- Towtruck

Play in championship mode until you unlock Face Off 2 in the special options screen. Defeat the Towtruck once to unlock it.

- Quick start

Accelerate immediately before the "1" fades during the pre-race countdown to start with a slight boost in speed.

- Increase boost

Drive on the wrong side of the road to keep increasing your boost. This can also be done by driving in the center of a double lane. Drive on the wrong side of the road and use the turbo when you get it. After it is gone, your turbo will either be full or half full.

- Full bonus


Drive a perfect lap (a lap without any accidents) and your bonus will be automatically filled.

- Better turns


When turning sharp corners, lightly tap the gas to turn sharper and slide less.




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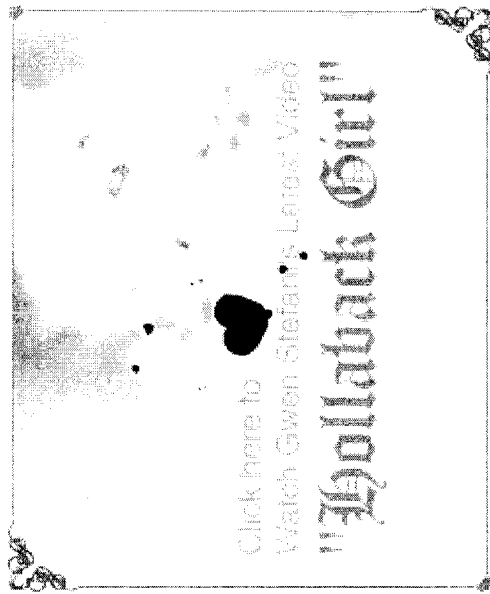


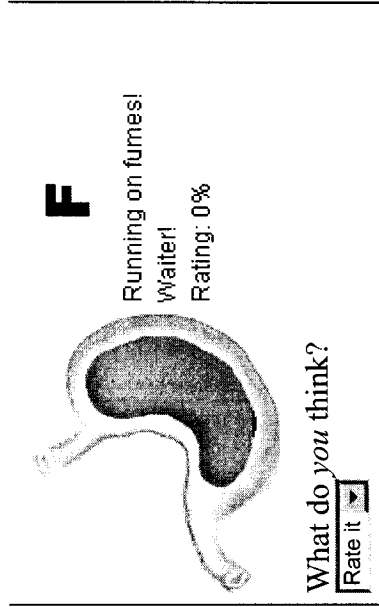
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Crave Raves



Burnout

Thursday, December 16, 2004 Posted: 12:00 AM PT



Strategy Guide

All racers

At the title screen, press R2(3), L1, Triangle, L2(3), R1, Square to unlock all characters.

Ending bonuses

Successfully complete the game to unlock the Free Run mode (no vehicles on the road), Free Run Twin mode (two player Free Run), and "Credits" options.

Face off mode

Successfully complete championship mode once to unlock face off mode against the Roadster.

Bus

Defeat the bus in Face Off 4 to unlock it.

Roadster

Defeat the Roadster in Face Off mode to unlock it and another face off race against another car.

Saloon GT

Exhibit C Page 80

Defeat the Saloon GT in Face Off 3 to unlock it.

Towtruck

Play in championship mode until you unlock Face Off 2 in the special options screen. Defeat the Towtruck once to unlock it.

Quick start

Accelerate immediately before the "1" fades during the pre-race countdown to start with a slight boost in speed.

Increase boost

Drive on the wrong side of the road to keep increasing your boost. This can also be done by driving in the center of a double lane. Drive on the wrong side of the road and use the turbo when you get it. After it is gone, your turbo will either be full or half full.

Full bonus

Drive a perfect lap (a lap without any accidents) and your bonus will be automatically filled.

Better turns

When turning sharp corners, lightly tap the gas to turn sharper and slide less.

Game Shark Codes

- Master Code (Must Be On) EC8783CC 1444403C
- Infinite Turbo All Races 4CADF902 145625DD
- Infinite Credits 4CBB7938 1456089C4CBC83E8 1456089C4CA26E78 1456089C
- Unlock Survival Mode 3CA215C4 1456E7A5
- Unlock All Cars 1CA21528 1456E7A51CA2152C 1456E7A51CA21530 1456E7A51CA2152E 1456E7A51CA21534 1456E7A51CA21538 1456E7A51CA2153C 1456E7A51CA21540 1456E7A5
- Unlock All Tracks 3CA2154C 1456E7A53CA21554 1456E7A53CA2155C 1456E7A53CA21564 1456E7A53CA2156C 1456E7A53CA21574 1456E7A5
- Unlock All Face-Offs 3CA215B4 1456E7A53CA215B8 1456E7A53CA215BC 1456E7A53CA215C0 1456E7A5
- Perfect Stats in Single Race Average Speed, Best Lap, etc. 1CBCA938 1456E7A51CBCA93C 1456E7A61CBCA918 1456E7A51CBCA91C 1456E7A61CBCA8F8 17E9C70C1CBCABD8 17E9C70C1CBCAAB8 17E9C70C
- Perfect Stats in Championship Race Average Speed, Best Lap, etc. 1CBC91D8 1456E7A51CBC91D8 1456E7A61CBC90B8 1456E7A51CBC90BC 1456E7A61CBC9398 17E9C70C1CBC9278 17E9C70C1CBC9558 17E9C70C1CA7B888 F77A40681CA7B88C DB9407981CA7B890 EF7528C51CA7B894 F36E14821CA7B898 14563C97

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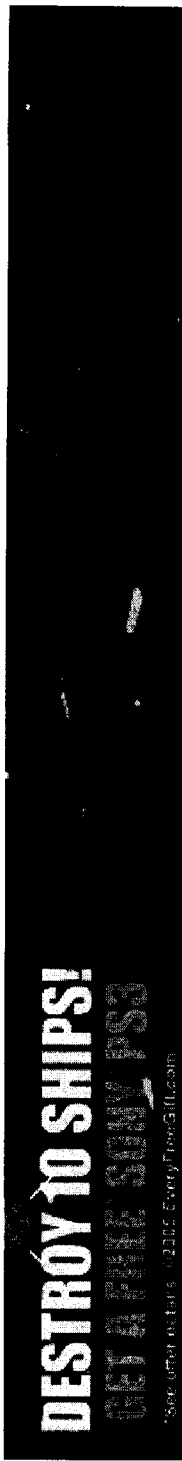
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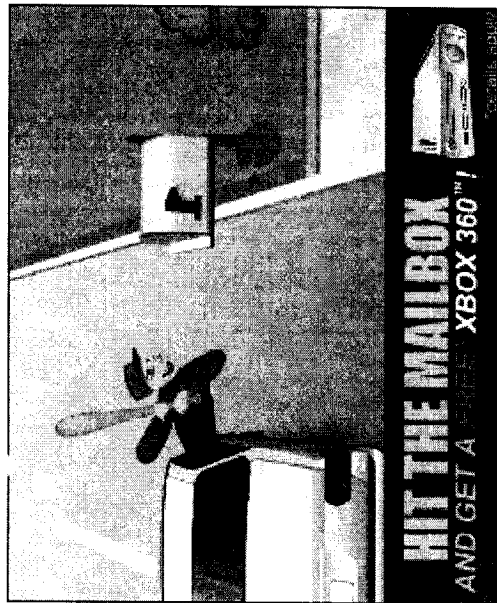
360
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ksrv.com

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The Hulk

(Last updated: June 19, 2003)



- Invulnerability

Select the "Code Input" selection at the options screen, then enter "GMMSKIN" as a code to unlock this option at the cheats menu. The Hulk and Bruce Banner will be invincible.

- Regenerator

Select the "Code Input" selection at the options screen, then enter "FLSHWND" as a code to unlock this option

at the cheats menu. The Hulk will regenerate faster.

- Full Rage Meter

Select the "Code Input" selection at the options screen, then enter "**ANGMNGT**" as a code to unlock this option at the cheats menu. The Rage meter always remains full.

- Infinite Continues

Select the "Code Input" selection at the options screen, then enter "**GRNCHTR**" as a code to unlock this option at the cheats menu.

- Double Hulk's HP

Select the "Code Input" selection at the options screen, then enter "**HLTHDSE**" as a code to unlock this option at the cheats menu.

- Double All Enemies HP

Select the "Code Input" selection at the options screen, then enter "**BRNGITN**" as a code to unlock this option at the cheats menu.

- Half All Enemies HP

Select the "Code Input" selection at the options screen, then enter "**MMMYHLP**" as a code to unlock this option at the cheats menu.

- Wicked Punch

Select the "Code Input" selection at the options screen, then enter "**FSTOFRY**" as a code to unlock this option at the cheats menu. The Hulk will have one hit kills.

- Puzzle Solved

Select the "Code Input" selection at the options screen, then enter "**BRCESTN**" as a code to unlock this option at the cheats menu. Puzzles will immediately be solved.

- Reset High Score

Select the "Code Input" selection at the options screen, then enter "**NMBTHIH**" as a code to unlock this option at the cheats menu.

- Unlock All Levels

Select the "Code Input" selection at the options screen, then enter "**TRUBLVR**" as a code to unlock this option at the cheats menu.

- Play as Gray Hulk

Find a terminal during a game, then enter "**JANITOR**" as a code.

- Hulk Transformed movie art

Find a terminal during a game, then enter "**SANFRAN**" as a code.

- Hulk vs. Hulk Dogs movie art

Find a terminal during a game, then enter "**PITBULL**" as a code.

- Desert Battle movie art

Find a terminal during a game, then enter "**FIFTEEN**" as a code.

- Hulk Movie F/X movie art


Find a terminal during a game, then enter "**NANOMED**" as a code.

- Destroying helicopters


If you get something to throw, pick it up then jump on the roof. Jump while on the roof. If done correctly, you can blow up the helicopters.




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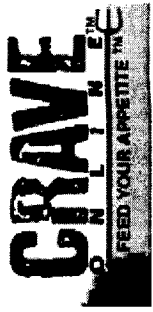
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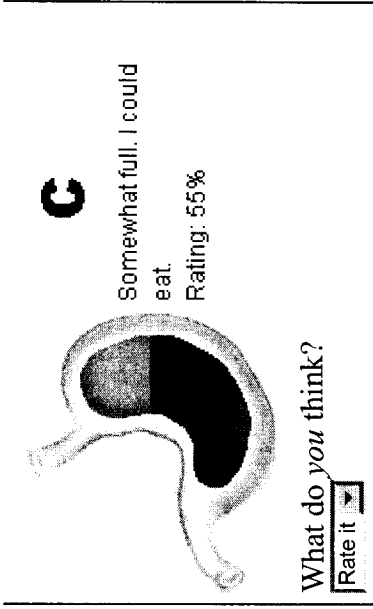
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Crave Raves

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X The Hulk
XBOX

Thursday, December 16, 2004 Posted: 12:00 AM PT



Invulnerability

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Hulk vs. Hulk Dogs movie art

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Desert Battle movie art

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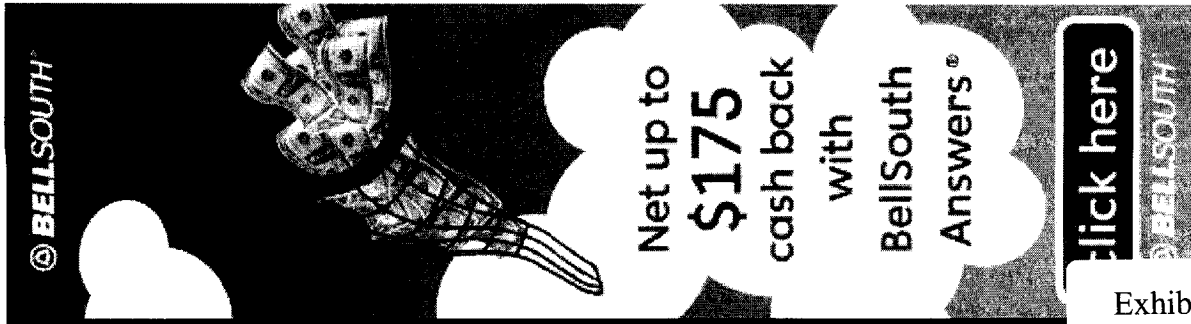


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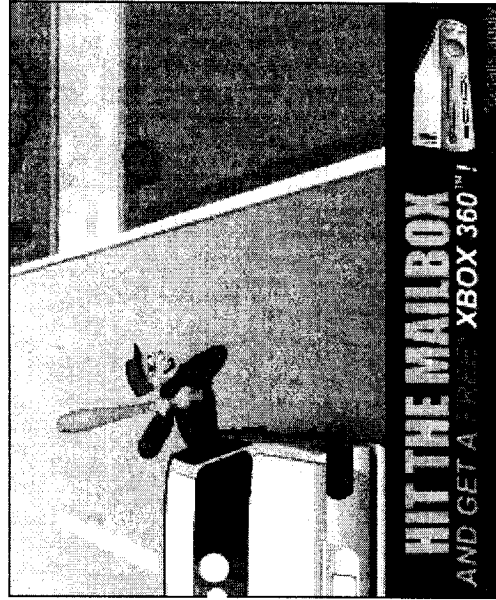
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Seablade

(Last updated: February 27, 2003)



- Mission select

Pause the game and press X, Y, L, X, R(2). Exit to the mission selection screen and all of them will be unlocked.

- Invincibility

Pause the game and press R, Y, L, X(2), R. Although your health will still decrease, you will not lose a life when it reaches zero.



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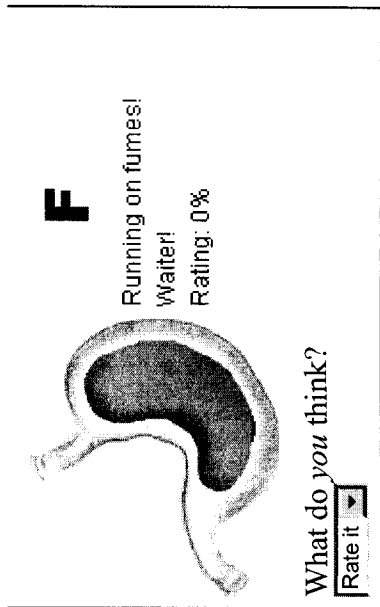
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Crave Raves



X **Seablade**
XBOX

Thursday, December 16, 2004 Posted: 12:00 AM PT



Mission select

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Pause the game and press R, Y, L, X(2), R. Although your health will still decrease, you will not lose a life when it reaches zero.

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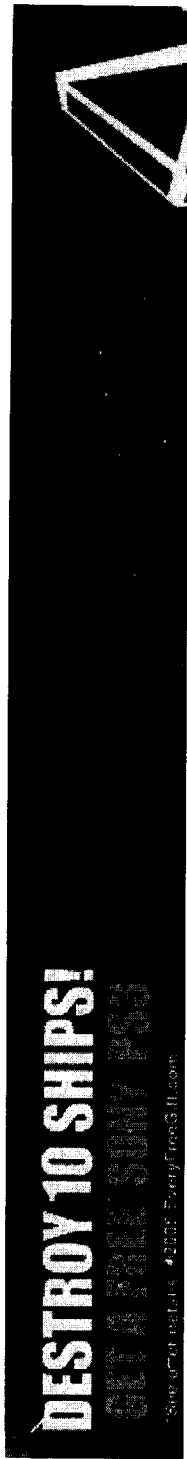
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Exhibit C Page 103



Chase: Hollywood Stunt Driver

(Last updated: February 27, 2003)



Strategy Guide

- Level select

Enter "Action Star" as a name at the create a user name screen. All levels will be unlocked without the required reputation points.



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Year:



S

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M/L/K

Martin Luther King High (676)

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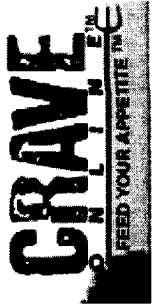
Trinity High School (328)

18

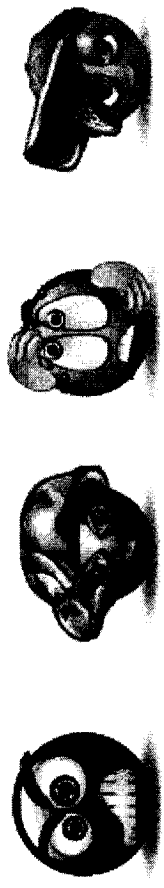
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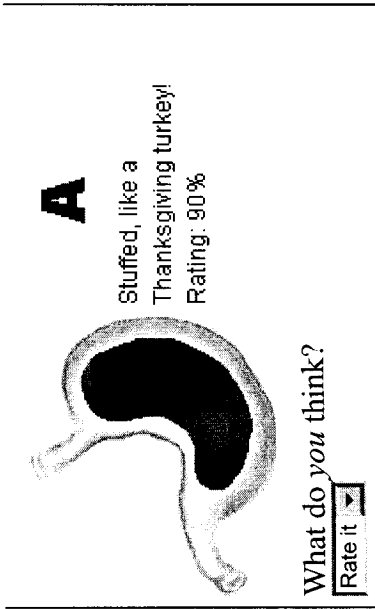
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Crave Raves



X **Chase: Hollywood Stunt Driver**

Thursday, December 16, 2004 Posted: 12:00 AM PT



Strategy Guide

Level select

Enter "Action Star" as a name at the create a user name screen. All levels will be unlocked without the required reputation points.

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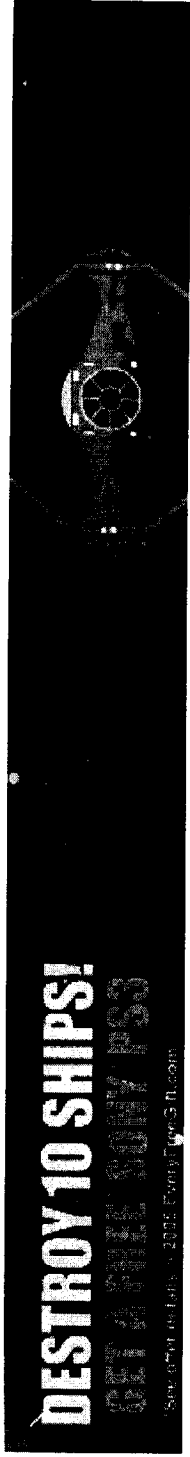
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FIFA 2005

(Last updated: December 1, 2004)



Strategy Guide

- Easy goals

You can score easy goals by crossing from the side and pressing B for a bicycle kick/header (90% success rate). Additionally, swap sides and sabotage your opponent's line up. Take off the king-pins, put center backs up front, etc. Then, resume control of your original team again and continue playing. Also, to easily fake the goalie out on the opposite team, press Black. The goalie will dive to a ball that is not there. Then, make a left or a right and

press Y. Do not press B or the ball will go in an unwanted place.

- Easy goal from penalty

To score an easy goal from a penalty, just tap B with no direction pressed. You will usually always score.

- Free kick

In order to get a good free kick, you must stop the meter at the green spot and the ball must curve to fool the keeper. There is no need to bend the ball, because it bends itself. If you bend it, you will miss the goal. The meter must stop near the green spot. Just aim the ball by the side of keeper slightly to the right of your screen. There is no need to bend the ball and take the free kick. Try this in practice mode. Additionally, to score a free kick, put the target in the top corner of the side of the goal that the wall is standing in front of. Make sure that you do not press Spin and that the spin target is in the dead center of the ball. Put a fair amount of power in, but do not go near there. Also, make sure the accuracy is in the middle of the green. The ball will shoot over the wall and into the top corner.

- Restore physical stats

Save the game after a career mode game. Quit, then reload the saved game to increase the physicals stats of your players.

- Be Celtic or Rangers in career mode

When you first try to start a career in Region 1, you will notice that you cannot be Celtic or Rangers. However, if you select "Back" then go in again several times, Celtic and Rangers will appear at the selection screen.

- Good volley

Press White, then B to chip then volley the ball in a unique way.

- Good skill

To do good skill, press White and move the Right Analog-stick in any direction. You can do nutmegs.

- Strong team

To play with a great team on career mode, first choose your favorite team on the beginning screen. Then, go to

the player creation screen. Create the players that you want or need. At the team options screen, send them to your team, then go to career mode. In the screen that appears before the game (squad and formation screen), make the necessary substitutions. This is an easy way to play on professional or world class level, and give your players all the needed stats.

This trick works well in career mode, but is extremely time consuming. Create yourself, and up to two other fielders. Place yourself on any team that has a rating of half a star or one star (for example, Chattertown in Football League 2). After doing this, release the best players on that team, keeping only enough players to have 18. Create a perfect goalie to keep on your roster. Next, create about fifteen goalies that are perfect, and make sure to set their year of birth to 1960. By doing this, they are all 44 years old and will retire at the end of the season. After doing all this, choose the team that you put the players on as "Your Team". By doing this, when you go into career mode they will be the first team in the list. Select that team then go ahead and start career mode. When you start, go directly to the transfer market. Once there, trade away as many of the old perfect goalies that you have. You will get about 32,000 to 35,000 for each goalie in transfer points. This will leave you with about 250,000 to 300,000 transfer points at the end. You can take that money and buy the best players so that your team will be stacked from the start of career mode. The only snag is that besides the perfect goalie you created for yourself to keep, you will have to keep two of the old goalies. This is acceptable, because when they retire you will get scouted players that are extremely good.

- Skip music/EA Trax

Click the Right Analog-stick to skip the current playing song. This can be done in every screen that is playing the EA Trax, except during loading from and saving to the memory card.

- Team selection in career mode

If you cannot find your team in a region in career mode, choose that team as your "Own Team" in your profile in My FIFA 2005. You will then find that team listed first in its current region.

- Changing teams in category

When you start a new season and cannot find the team, go back then enter that category again. The teams will change.

- My FIFA store points

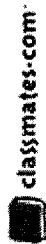
Successfully complete the following tasks to earn the corresponding number of points at the My FIFA store:

Go To Career Mode: 1,000 points
 Go To Jukebox: 1,000 points
 Go To Practice Mode: 1,000 points
 Go To Set Pieces Screen: 1,000 points
 Go To Tournament Creator Mode: 1,000 points
 Go To Tournament Mode: 1,000 points
 5 Game Win Streak (Career): 2,000 points
 Beat a 5 star team: 2,000 points
 Beat a Rival Team: 2,000 points
 Get a Clean Sheet: 2,000 points
 Play a Football Fusion match: 2,000 points
 Qualify For Europe: 4,000 points
Play Online: 4,000 points
 Create a Player: 6,000 points
 Get Your Team Promoted: 6,000 points
 Win The MLS Open Cup: 6,000 points
 Score a Hat Trick: 6,000 points
 10 Game Win Streak (Career): 6,000 points
 Win a Match with a National Team: 6,000 points
 Win a PK Shootout: 6,000 points
 Win by 5 + Goals: 6,000 points
 Win The Austrian OFB Cup: 6,000 points
 Win The Austrian Bundesliga: 6,000 points
 Win The Belgian FA Cup: 6,000 points
 Win The Belgian League: 6,000 points
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 Win The Community Shield (England): 6,000 points
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 Win The Dutch Cup: 6,000 points

Win The Dutch Eredivisie: 6,000 points
 Win The ECC: 6,000 points
 Win The EFA: 6,000 points
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 Win The Spanish Primera: 6,000 points
 Win The Spanish Segunda: 6,000 points
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 Win The Swedish Allsvenskan: 6,000 points
 Win The Swedish Cup: 6,000 points
 Win The Swiss Axpo Super League: 6,000 points
 Win The Swiss Cup: 6,000 points
 Win The Trophée Champions (France): 6,000 points
 Win The Americas Club Championship: 6,000 points
 Win The Mexican Clausura: 6,000 points
 Win The Copa del Rey: 6,000 points
 Score a goal with a created player: 8,000 points
 Complete career mode: 8,000 points
 Become a 5 star manager: 10,000 points



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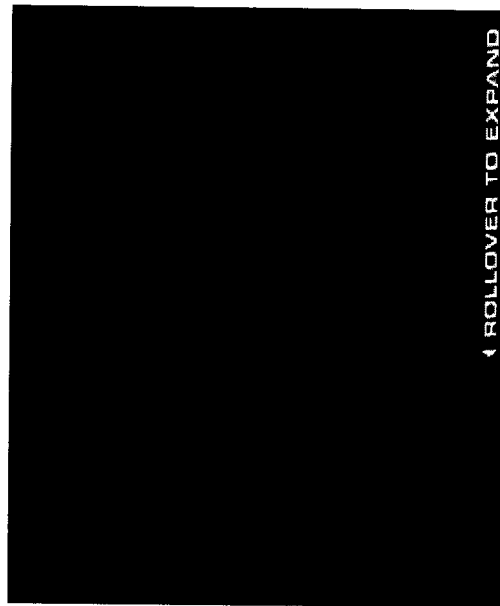
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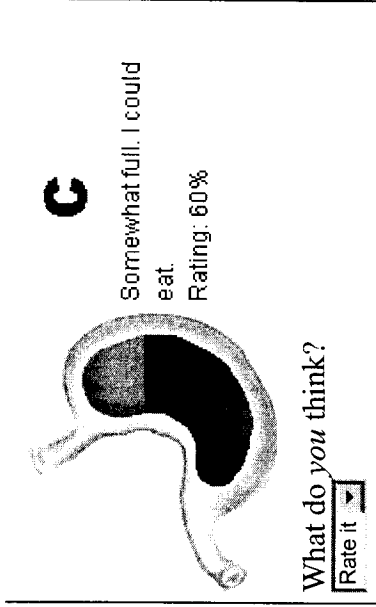
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Crave Raves



XBOX FIFA 2005

Thursday, December 16, 2004 Posted: 12:00 AM PT



Strategy Guide

Easy goals

You can score easy goals by crossing from the side and pressing B for a bicycle kick/header (90% success rate). Additionally, swap sides and sabotage your opponents line up. Take off the king-pins, put center backs up front, etc. Then, resume control of your original team again and continue playing. Also, to easily fake the goalie out on the opposite team, press Black. The goalie will dive to a ball that is not there. Then, make a left or a right and press Y. Do not press B or the ball will go in an unwanted place.

Easy goal from penalty

To score an easy goal from a penalty, just tap B with no direction pressed. You will usually always score.

Free kick

In order to get a good free kick, you must stop the meter at the green spot and the ball must curve to fool the keeper. There is no need to bend the ball, because it bends itself. If you bend it, you will miss the goal. The meter must stop near the green spot. Just aim the ball by the side of keeper slightly to the right of your screen. There is no need to bend the ball and take the free kick. Try this in practice mode. Additionally, to score a free kick, put the target in the top corner of the side of the goal that the wall is standing in front of. Make sure that you do not press Spin and that the spin target is in the dead center of the ball. Put a fair amount of power in, but do not go near there. Also, make sure the accuracy is in the middle of the green. The ball will shoot over the wall and into the top corner.

Restore physical stats

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Save the game after a career mode game. Quit, then reload the saved game to increase the physicals stats of your players.

Be Celtic or Rangers in career mode

When you first try to start a career in Region 1, you will notice that you cannot be Celtic or Rangers. However, if you select "Back" then go in again several times, Celtic and Rangers will appear at the selection screen.

Good volley

Press White, then B to chip then volley the ball in a unique way.

Good skill

To do good skill, press White and move the Right Analog-stick in any direction. You can do nutmegs.

Strong team

To play with a great team on career mode, first choose your favorite team on the beginning screen. Then, go to the player creation screen. Create the players that you want or need. At the team options screen, send them to your team, then go to career mode. In the screen that appears before the game (squad and formation screen), make the necessary substitutions. This is an easy way to play on professional or world class level, and give your players all the needed stats.

This trick works well in career mode, but is extremely time consuming. Create yourself, and up to two other fielders. Place yourself on any team that has a rating of half a star or one star (for example, Chattertown in Football League 2). After doing this, release the best players on that team, keeping only enough players to have 18. Create a perfect goalie to keep on your roster. Next, create about fifteen goalies that are perfect, and make sure to set their year of birth to 1960. By doing this, they are all 44 years old and will retire at the end of the season. After doing all this, choose the team that you put the players on as "Your Team". By doing this, when you go into career mode they will be the first team in the list. Select that team then go ahead and start career mode. When you start, go directly to the transfer market. Once there, trade away as many of the old perfect goalies that you have. You will get about 32,000 to 35,000 for each goalie in transfer points. This will leave you with about 2

50,000 to 300,000 transfer points at the end. You can take that money and buy the best players so that your team will be stacked from the start of career mode. The only snag is that besides the perfect goalie you created for yourself to keep, you will have to keep two of the old goalies. This is acceptable, because when they retire you will get scouted players that are extremely good.

Skip music/EA Trax

Click the Right Analog-stick to skip the current playing song. This can be done in every screen that is playing the EA Trax, except during loading from and saving to the memory card.

Team selection in career mode Exhibit C Page 119

If you cannot find your team in a region in career mode, choose that team as your "Own Team" in your profile in My FIFA 2005. You will then find that team listed first in its current region.

Changing teams in category

When you start a new season and cannot find the team, go back then enter that category again. The teams will change.

My FIFA store points

Successfully complete the following tasks to earn the corresponding number of points at the My FIFA store:

- Go To Career Mode: 1,000 points
- Go To Jukebox: 1,000 points
- Go To Practice Mode: 1,000 points
- Go To Set Pieces Screen: 1,000 points
- Go To Tournament Creator Mode: 1,000 points
- Go To Tournament Mode: 1,000 points
- 5 Game Win Streak (Career): 2,000 points
- Beat a 5 star team: 2,000 points
- Beat a Rival Team: 2,000 points
- Get a Clean Sheet: 2,000 points
- Play a Football Fusion match: 2,000 points
- Qualify For Europe: 4,000 points
- Play Online: 4,000 points
- Create a Player: 6,000 points
- Get Your Team Promoted: 6,000 points
- Win The MLS Open Cup: 6,000 points
- Score a Hat Trick: 6,000 points
- 10 Game Win Streak (Career): 6,000 points
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- Win by 5 + Goals: 6,000 points
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- Win The Austrian Bundesliga: 6,000 points
- Win The Belgian FA Cup: 6,000 points
- Win The Belgian League: 6,000 points
- Win The Brazilian Cup: 6,000 points
- Win The Brazilian League: 6,000 points
- Win The LDV Vans Trophy (England): 6,000 points
- Win The Community Shield (England): 6,000 points

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- Win The Supercopa (Spain): 6,000 points
- Win The Copa de España (Spain): 6,000 points
- Win The Coppa Nazionale (Italy): 6,000 points
- Win The Coupe de France: 6,000 points
- Win The Coupe de la Ligue (France): 6,000 points
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- Win The Swedish Allsvenskan: 6,000 points
- Win The Swedish Cup: 6,000 points
- Win The Swiss Axpo Super League: 6,000 points

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- Win The Swiss Cup: 6,000 points
- Win The Trophée Champions (France): 6,000 points
- Win The Americas Club Championship: 6,000 points
- Win The Mexican Clausura: 6,000 points
- Win The Copa del Rey: 6,000 points
- Score a goal with a created player: 8,000 points
- Complete career mode: 8,000 points
- Become a 5 star manager: 10,000 points

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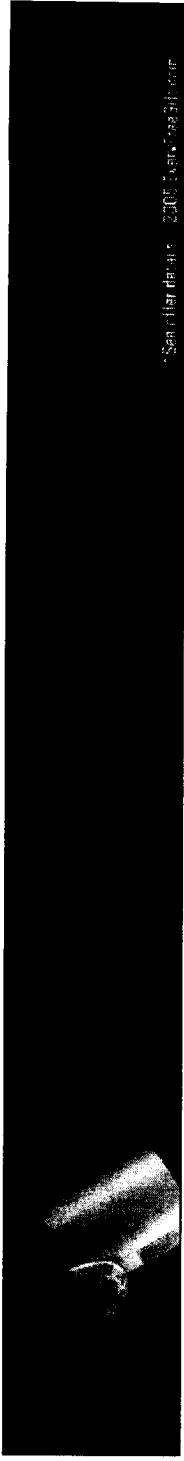
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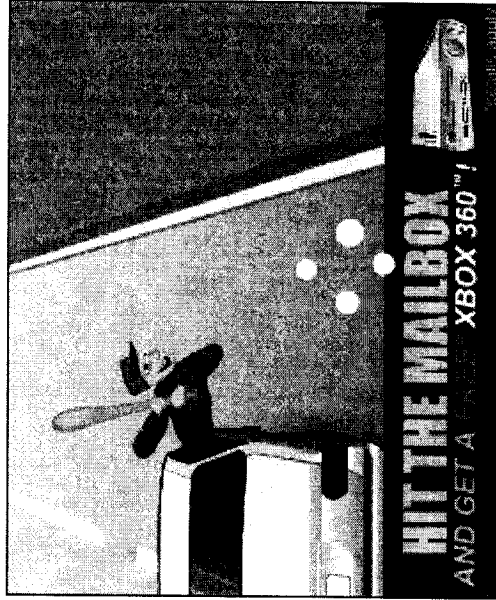
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The Lord Of The Rings: The Two Towers

(Last updated: February 6, 2003)



Strategy Guide

- Restore health

Pause the game, then hold L + R and press Y, Down, A, Up. If you entered the code correctly, you will hear the sound of a sword.

- Restore ammunition

Pause the game, then hold L + R and press A, Down, Y, Up. If you entered the code correctly, you will hear the sound of a sword.

- Add 1000 experience points

Pause the game, then hold L + R and press A, Down(3). If you entered the code correctly, you will hear the sound of a sword.

- Level 2 skills

Pause the game, then hold L + R and press B, Right, B, Right. If you entered the code correctly, you will hear the sound of a sword.

- Level 4 skills

Pause the game, then hold L + R and press Y, Up, Y, Up. If you entered the code correctly, you will hear the sound of a sword.

- Level 6 skills

Pause the game, then hold L + R and press X, Left, X, Left. If you entered the code correctly, you will hear the sound of a sword.

- Level 8 skills

Pause the game, then hold L + R and press A(2), Down(2). If you entered the code correctly, you will hear the sound of a sword.

- Invincibility

Pause the game, then hold L + R and press Y, X, A, B. If you entered the code correctly, you will hear the sound of a sword. **Note:** The game must be completed first before this code can be enabled.

- Infinite missile weapons

Pause the game, then L + R and press X, B, A, Y. If you entered the code correctly, you will hear the sound of a sword. **Note:** The game must be completed first before this code can be enabled.

- Devastating attacks

Pause the game, then hold L + R and press X(2), B(2). If you entered the code correctly, you will hear the sound of a sword. Hold Y during battles to do devastating attacks. **Note:** The game must be completed first before this code can be enabled.

- All combo upgrades

Pause the game, then hold L + R and press Y, B, Y, B. If you entered the code correctly, you will hear the sound of a sword. **Note:** The game must be completed first before this code can be enabled.

- Small enemies

Pause the game, then hold L + R and press Y(2), A(2). If you entered the code correctly, you will hear the sound of a sword. **Note:** The game must be completed first before this code can be enabled.

- Slow-motion mode

Pause the game, then hold L + R and press Y, B, A, X. If you entered the code correctly, you will hear the sound of a sword. **Note:** The game must be completed first before this code can be enabled.

- Tower Of Orthanc level

Successfully complete the game with Aragon at level 10 to unlock the Tower Of Orthanc level.

- Fangorn and Tower Of Orthanc background photos

Successfully complete the Fangorn's Forest level with any character to unlock Fangorn and Tower Of Orthanc background photos.

- Rohan and Helm's Deep background photos

Successfully complete the Plains of Rohan level with any character to unlock Rohan and Helm's Deep background photos.

- Fellowship Of The Ring background photos

Successfully complete the Balin's Tomb level with any character to unlock Fellowship Of The Ring background photos.

- John Rhys-Davis interview

Play as Gimli and get him to level 5 to unlock the John Rhys-Davis interview.

- Orlando Bloom interview

Play as Legolas and get him to level 5 to unlock the Orlando Bloom interview.

- Viggo Mortenson interview

Play as Aragorn and get him to level 5 to unlock the Viggo Mortenson interview.

- Play as Isildur

Successfully complete the game with Aragorn, Gimli, and Legolas to unlock Isildur as a playable character on most levels.

- Easy level

The easiest way to level up is to repeatedly enable the "Add 1000 experience points" code. Each time you level up, you will hear a noise along with the sword.

- Easy experience

Note: This trick only works with Aragorn. At the start of each level, go to the options menu and change difficulty to hard. Kill one enemy, then return the difficulty back to easy.

- Easy Perfects

This trick is easiest when done with Legolas because of the way he moves. After you get to level 8, purchase Elrond's, Isildur's, or Balin's Judgment. Work on using it and getting very proficient with it. After mastering it, go to any level you want to get a Perfect on. This will not work every time, but if you can kill two enemies using the Judgment, you can usually get a perfect devastating sword. After you get this, go around killing as many enemies as possible, then repeat.

- Easy "Excellent" rank

When you can play levels over again, use this trick. It will take several attempts, depending on your skill. In all of the levels (excluding Weathertop, Amon Hen, Plains of Rohan, Breached Wall, and the Helms Deep), you can complete the level with an "Excellent" rank, just by killing one or two Orcs, and getting "Excellent". Kill a few Orcs at the beginning of the level (five or more), getting an "Excellent" rank. Then, run near to the end of the level. For example, in the Gates of Moria level kill off the first few Orcs with your Linked Move until the intermission sequence with the arrow and the Orc and Gimli. Then, run to the part where you need to kill the Watcher, and do not kill any Orcs on the way, unless you have to. No orcs will follow you to the Boss part after you have started it. Kill the Watcher. When your kills get counted, as you will see, you will have more "Excellent" kills.

- Putting out fires

Many parts of the game will require you to put out a fire or save people in order to move on to the next area. Look for a barrel in the area of the fire. Smash it with a speed attack and water will flow out, extinguishing any fires it can.

- Defeating Lurtz (as Aragorn)

Lurtz starts by shooting arrows. Deflect them with your sword then fire a charged arrow at him. Keep repeating this until the intermission sequence where he grabs a sword from the ground begins. When he charges you, kill the minions that appear and try to hide behind one of the marble statues surrounding the arena. He will stab it, stick in, then be open for an attack. Use the Y thrust. Normally, two shots can be dealt and sometimes a third if you are lucky. **Note:** This is on the easy and normal difficulty setting. Also, when he rips his sword from the marble statue, it disintegrates, dropping health, arrows or other useful items.

- Defeating the Orc Overseer riding the Warg

Take care of the Wargs and riders that are present when the battle starts. The Wargs charge, but just step out of the way. Fierce Attack as they pass and stop. Soon, you will be facing just the Orc Overseer on his Warg, who deflects every arrow with his sword. Close attacks are similarly foiled by the Warg biting you, lifting you into the air, and the Overseer slashes at you. He also charges, and the Warg swerves to hit you, and succeeds virtually every time, so take care of him as soon as possible. The Overseer regularly calls another Orc and Warg into the battle. Dispatch it in the same way as the others, but try to stay close to the Overseer. When you kill the summoned Orc and Warg, the Overseer's Warg rears up. When it does, run in behind it and Fierce Attack the Orc. You can usually get three good hits on him this way. After the third hit, he will slash you -- go back and wait for the next Orc and Warg to be summoned. Dispatch them and wait for the Overseer's Warg to rear again.

Repeat this three to four times to defeat him.

When you first encounter the Orc Overseer, he will have approximately four other Warg Riders with him. Dispatch these using any means necessary (projectile attacks work well), then get ready for the Overseer himself. Do not get too close or the Warg will bite you and the Orc riding it will slash you. Stay a safe distance away and the Overseer will charge. Parry the charge and you will receive little, if any, damage. Successfully parry a second charge and the Warg will back away and rear up on its hind legs. Move in and use any of the attack combinations to cause damage. Occasionally the Overseer will call in another Warg to help. Fire projectiles at this "helper" to eliminate it. Continue to parry the Overseer's charges. It will rear up after every second charge, at which time you can move in and eliminate him.


When you first see the Orc Overseer, he will have about four other allies with him. These are easy to kill. Do so, and you will face the Orc Overseer. You cannot shoot him, because he deflects your arrows/axes, and you cannot attack him because his Warg will bite and lift you into the air for the Orc Overseer to slash. He will charge at you. Parry those attacks. After about two charges, he will rear his Warg. Instead of going behind at this point, shoot it with an axe/arrow. It will fall and whine. Then, move in and slash the overseer with fierce attacks, combos, etc. This takes about half of his life away. He will send in a warg ally, which is useful. Whenever you kill him, he will drop arrows or life. Repeat this process until you win.

- Defeating Trolls



In the levels with Trolls, you can kill them easily without getting hit once. Run up to a Troll after it has thrown a log at you or tried to hit you. Press Y once only, then run away. Do not run too far. Stay close, but not too close for it to hit you. Wait until it takes a swipe at you, then run back at it and press Y once again. Repeat this until it is dead.



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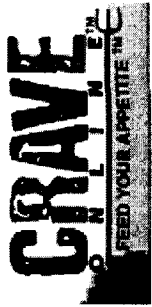
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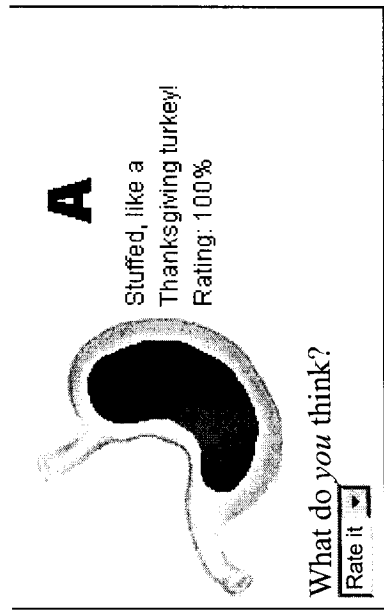


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Crave Raves



X The Lord Of The Rings: The Two Towers

Thursday, December 16, 2004 Posted: 12:00 AM PT



Strategy Guide

Restore health

Pause the game, then hold L + R and press Y, Down, A, Up. If you entered the code correctly, you will hear the sound of a sword.

Restore ammunition

Pause the game, then hold L + R and press A, Down, Y, Up. If you entered the code correctly, you will hear the sound of a sword.

Add 1000 experience points

Pause the game, then hold L + R and press A, Down(3). If you entered the code correctly, you will hear the sound of a sword.

Level 2 skills

Pause the game, then hold L + R and press B, Right, B, Right. If you entered the code correctly, you will hear the sound of a sword.

Level 4 skills

Pause the game, then hold L + R and press Y, Up, Y, Up. If you entered the code correctly, you will hear the sound of a sword.

Level 6 skills

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Pause the game, then hold L + R and press X, Left, X, Left. If you entered the code correctly, you will hear the sound of a sword.

Level 8 skills

Pause the game, then hold L + R and press A(2), Down(2). If you entered the code correctly, you will hear the sound of a sword.

Invincibility

Pause the game, then hold L + R and press Y, X, A, B. If you entered the code correctly, you will hear the sound of a sword. Note: The game must be completed first before this code can be enabled.

Infinite missile weapons

Pause the game, then L + R and press X, B, A, Y. If you entered the code correctly, you will hear the sound of a sword. Note: The game must be completed first before this code can be enabled.

Devastating attacks

Pause the game, then hold L + R and press X(2), B(2). If you entered the code correctly, you will hear the sound of a sword. Hold Y during battles to do devastating attacks. Note: The game must be completed first before this code can be enabled.

All combo upgrades

Pause the game, then hold L + R and press Y, B, Y, B. If you entered the code correctly, you will hear the sound of a sword. Note: The game must be completed first before this code can be enabled.

Small enemies

Pause the game, then hold L + R and press Y(2), A(2). If you entered the code correctly, you will hear the sound of a sword. Note: The game must be completed first before this code can be enabled.

Slow-motion mode

Pause the game, then hold L + R and press Y, B, A, X. If you entered the code correctly, you will hear the sound of a sword. Note: The game must be completed first before this code can be enabled.

Tower Of Orthanc level

Successfully complete the game with Aragon at level 10 to unlock the Tower Of Orthanc level. Exhibit C Page 134

The Lord Of The Rings: The Two Towers (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft ... Page 4 of 6
Fangorn and Tower Of Orthanc background photos

Successfully complete the Fangorns Forest level with any character to unlock Fangorn and Tower Of Orthanc background photos.

Rohan and Helms Deep background photos

Successfully complete the Plains of Rohan level with any character to unlock Rohan and Helms Deep background photos.

Fellowship Of The Ring background photos

Successfully complete the Balins Tomb level with any character to unlock Fellowship Of The Ring background photos.

John Rhys-Davis interview

Play as Gimli and get him to level 5 to unlock the John Rhys-Davis interview.

Orlando Bloom interview

Play as Legolas and get him to level 5 to unlock the Orlando Bloom interview.

Viggo Mortenson interview

Play as Aragorn and get him to level 5 to unlock the Viggo Mortenson interview.

Play as Isildur

Successfully complete the game with Aragorn, Gimli, and Legolas to unlock Isildur as a playable character on most levels.

Easy level

The easiest way to level up is to repeatedly enable the "Add 1000 experience points" code. Each time you level up, you will hear a noise along with the sword.

Easy experience

Note: This trick only works with Aragorn. At the start of each level, go to the options menu and change difficulty to hard. Kill one enemy, then return the difficulty back to easy.

Easy Perfects
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This trick is easiest when done with Legolas because of the way he moves. After you get to level 8, purchase Elronds, Isildurs, or Balins Judgment. Work on

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6/23/2005

using it and getting very proficient with it. After mastering it, go to any level you want to get a Perfect on. This will not work every time, but if you can kill two enemies using the Judgment, you can usually get a perfect devastating sword. After you get this, go around killing as many enemies as possible, then repeat.

Easy "Excellent" rank

When you can play levels over again, use this trick. It will take several attempts, depending on your skill. In all of the levels (excluding Weathertop, Amon Hen, Plains of Rohan, Breached Wall, and the Helms Deep), you can complete the level with an "Excellent" rank, just by killing one or two Orcs, and getting "Excellent". Kill a few Orcs at the beginning of the level (five or more), getting an "Excellent" rank. Then, run near to the end of the level. For example, in the Gates of Moria level kill off the first few Orcs with your Linked Move until the intermission sequence with the arrow and the Orc and Gimli. Then, run to the part where you need to kill the Watcher, and do not kill any Orcs on the way, unless you have to. No orcs will follow you to the Boss part after you have started it. Kill the Watcher. When your kills get counted, as you will see, you will have more "Excellent" kills.

Putting out fires

Many parts of the game will require you to put out a fire or save people in order to move on to the next area. Look for a barrel in the area of the fire. Smash it with a speed attack and water will flow out, extinguishing any fires it can.

Defeating Lurtz (as Aragorn)

Lurtz starts by shooting arrows. Deflect them with your sword then fire a charged arrow at him. Keep repeating this until the intermission sequence where he grabs a sword from the ground begins. When he charges you, kill the minions that appear and try to hide behind one of the marble statues surrounding the arena. He will stab it, stick in, then be open for an attack. Use the Y thrust. Normally, two shots can be dealt and sometimes a third if you are lucky. Note: This is on the easy and normal difficulty setting. Also, when he rips his sword from the marble statue, it disintegrates, dropping health, arrows or other useful items.

Defeating the Orc Overseer riding the Warg

Take care of the Wargs and riders that are present when the battle starts. The Wargs charge, but just step out of the way. Fierce Attack as they pass and stop. Soon, you will be facing just the Orc Overseer on his Warg, who deflects every arrow with his sword. Close attacks are similarly foiled by the Warg biting you, lifting you into the air, and the Overseer slashes at you. He also charges, and the Warg swerves to hit you, and succeeds virtually every time, so take care of him as soon as possible. The Overseer regularly calls another Orc and Warg into the battle. Dispatch it in the same way as the others, but try to stay close to the Overseer. When you kill the summoned Orc and Warg, the Overseers Warg rears up. When it does, run in behind it and Fierce Attack the Orc. You can usually get three good hits on him this way. After the third hit, he will slash you -- go back and wait for the next Orc and Warg to be summoned. Dispatch them and wait for the Overseers Warg to rear again. Repeat this three to four times to defeat him.

When you first encounter the Orc Overseer, he will have approximately four other Warg Riders with him. Dispatch these using any means necessary (projectile attacks work well), then get ready for the Overseer himself. Do not get too close or the Warg will bite you and the Orc riding it will slash you. Stay a safe distance away and the Overseer will charge. Parry the charge and you will receive little, if any, damage. Successfully parry a second charge and the Warg will back away and rear up on its hind legs. Move in and use any of the attack combinations to cause damage. Occasionally the Overseer will call

in another Warg to help. Fire projectiles at this "helper" to eliminate it. Continue to parry the Overseers charges. It will rear up after every second charge, at which time you can move in and eliminate him.

When you first see the Orc Overseer, he will have about four other allies with him. These are easy to kill. Do so, and you will face the Orc Overseer. You cannot shoot him, because he deflects your arrows/axes, and you cannot attack him because his Warg will bite and lift you into the air for the Orc Overseer to slash. He will charge at you. Parry those attacks. After about two charges, he will rear his Warg. Instead of going behind at this point, shoot it with an axe/arrow. It will fall and whine. Then, move in and slash the overseer with fierce attacks, combos, etc. This takes about half of his life away. He will send in a warg ally, which is useful. Whenever you kill him, he will drop arrows or life. Repeat this process until you win.

Defeating Trolls

In the levels with Trolls, you can kill them easily without getting hit once. Run up to a Troll after it has thrown a log at you or tried to hit you. Press Y once only, then run away. Do not run too far. Stay close, but not too close for it to hit you. Wait until it takes a swipe at you, then run back at it and press Y once again. Repeat this until it is dead.

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Ninja Gaiden

(Last updated: October 30, 2004)



Strategy Guide

- Always have starting costume

At the main menu, highlight the "New Game" option, then hold L + R and press A. If you entered the code correctly, you will hear the sound of a scream. Ryu will continue using his starting blue costume throughout the game.

- Alternate costumes

Successfully complete the game on the normal or hard difficulty settings. Then, hold L while selecting the "New Game" option at the opening menu to wear the Ninja Of The Future costume. Successfully complete the game on the very hard difficulty setting to unlock Ryu's Fiend Costume. It is the same blue skin obtained in Chapter 14 after defeating Doku for the second time.

After installing the Hurricane Pack: Volumes 1 or 2 on Xbox Live, hold Black while selecting a level in master tournament for the Evil Ryu costume. Hold White while selecting a level in master tournament for the Dead Or Alive Ninja costume.

- Dabilahro Sword

Give 20 Scarabs to Muramasa to unlock the Dabilahro Sword. **Note:** In successive mode you do not get it again until you give 43 Scarabs to Muramasa.

- Plasma Saber

Successfully complete the game on the normal difficulty setting. A new sword called the Plasma Saber (which resembles a lightsaber from Star Wars) will now be unlocked.

- Plasma Saber Mk. II

Successfully complete the game on the very hard difficulty setting to unlock the Plasma Saber Mk. II.

- Skip FMV sequences

Press Start, A, Start to advance past an FMV sequence. **Note:** This does not work all of the time.

- All FMV sequences

Successfully complete the game on the normal or hard difficulty settings to unlock all FMV sequences.

- Very hard difficulty

Successfully complete the game on the normal or hard difficulty settings to unlock the very hard difficulty setting.

- Original Ninja Gaiden mini-game

Give 50 Scarabs to Muramasa to unlock the original *Ninja Gaiden* game. This does not have to be done in a single game play-through. You can continue from a completed game save and collect the Scarabs that were originally missed until you have the required 50 Scarabs. After giving them to Muramasa, you will get the *Ninja Gaiden* disc to be used at the arcade machine at Han's Bar's first floor.

- Original Ninja Gaiden 2: The Dark Sword Of Chaos mini-game

Get a "Master Ninja" rank in all levels on the normal difficulty setting to unlock the original *Ninja Gaiden 2: The Dark Sword Of Chaos* game. Alternately, first unlock *Ninja Gaiden*. Then go to the Clock Tower Plaza of Tairon. Get on the ledge above the multicolored door that leads to Pleasure Street (where you flip the switch to unlock that door). Aim your bow at the clock tower across the street. Shoot the face of the clock and a treasure chest will appear on the building that is across the street. Jump down, and enter the doorway across the street with the stairs. Climb to the top, and open the chest to unlock the *Ninja Gaiden 2* disc.

- Original Ninja Gaiden 3: The Ancient Ship Of Doom mini game

Get a "Master Ninja" rank in all levels on the hard or very hard difficulty settings to unlock the original *Ninja Gaiden 3: The Ancient Ship Of Doom* game. Alternately, first unlock *Ninja Gaiden 2*. Go to the Peristyle Passage (the ceremonial room in the Aqueducts, just before the Boss fight with the giant fossil bird). It is next to the Hall of Balance. Triangle Jump back up to the top of the broken pillar where a Scarab was previously hidden. You will now find the disc for *Ninja Gaiden 3* at that location.

- Playing classic games easier

Instead of going to the first floor of Han's Bar, use the following trick to start the games from the main menu. Successfully complete the main game while any classic *Ninja Gaiden* disc is in Ryu's inventory. This will unlock another main menu option that will allow you to play the classic games from there, without going to Han's Bar.

- Armlet Of Benediction
- Give 15 Scarabs to Muramasa to unlock the Armlet Of Benediction.
- Armlet Of Fortune
- Give 30 Scarabs to Muramasa to unlock the Armlet Of Fortune.

- Armlet Of Tranquillity

Give 40 Scarabs to Muramasa to unlock the Armlet Of Tranquillity.

- Dark Dragon Blade

Successfully complete the game on any difficulty setting. Start an already completed game and kill anything in your path. The more people that you kill, the more likely you will get the Dark Dragon Blade. When you reach the part to upgrade your Dragon Sword to the final level, jump into the open house and stay on the top level. The Dark Dragon Blade should now be into the ground, ready for you to unleash its power.

- Healing Bracelet

Give 40 Scarabs to the shopkeeper for a healing bracelet that will slowly replenish your health. If you do not care about time, you can just stand in a no enemy area and just heal away.

- Life of the Gods

Give one Scarab to Muramasa to unlock the Life of the Gods.

- Spirit of the Devils

Give 10 Scarabs to Muramasa to unlock the Spirit of the Devils.

- Unlabored Flawlessness

Upgrade the wooden sword completely to receive its true form, the Unlabored Flawlessness. It is a large weapon which you swing like the war hammer and Dabilahro, and has a very powerful Ki attack. This weapon makes Boss fights easy.

- War Hammer

After defeating the flying female Boss that breaks through the stained glass, immediately when you start the next level run back into the doors. Go past all the debris and you can find the War Hammer in the area where you fought the Boss.

- Windmill Shuruken

Go to Han's bar but do not go in the front of the club. There is an alley that has blue striped walls. Run on these blue stripes and it should lead you to a platform with an silver Xbox that replenishes your health and a metal plate that holds the Windmill Shuriken.

- In-game reset

While playing a game, press Start + Back to return to the main menu.

- Special attack

Press Y + B to unleash a super attack that will seriously hurt anyone.

- Kill enemies quickly

To kill an enemy very fast, jump towards them fairly close using A, then quickly tap Y immediately before you hit them. You should either throw them with the guillotine throw or slice their heads off. If they keep trying to get off the ground, tap Y again to pin them down or cut their head off. This is useful when you need some extra money, are almost dead, or when you just simply want to get through the section quickly because of frustration.

- Finishing kill

While a foe is on the ground, walk up to it and press Y. This will instantly kill almost any foe.

- Less battle damage

When you are grabbed by an enemy or a Boss such as the Dragon, mash the buttons quickly to escape without taking full damage.

- Longer wall running

When you are about to fall from wall running too far, jump forward towards the wall again. You will start to wall run again.

- Easy Essence

Killing a foe without using Y will give you five times more Essence. Also in Chapters 6 and 7, you will encounter the skeleton dino Boss. After you defeat him, climb down towards the new opening he made in the floor, but stop at the save location. Turn around with your Nunchakun and jump up to the bats. Once you reach

them, kill no more than two to four bats and charge your super attack taking in two Essence Orbs. Then, unleash the attack and gather up to 2,000 Essence each time. To replenish the bats, jump back to the save point and repeat. The bats will not hurt you enough to kill, and will randomly give you health. Once you gather all the Essence desired, you can whatever desired. The maximum amount of Essence that can be held is 99,999.

The "Easy Essence" trick that can be done on Chapters 6 and 7 also works on Chapter 10. Go to the room in which you come down the ladder at the start of the level. It is also the room that leads into the first aqueduct.

In the Hayabusa Ninja Village before the fight with the Samurai Horsemen, there are three square targets just beside a dead ninja. Backtrack a little until you see a parallel wood with the three targets. Shoot the first two targets with the bow for easy Red and Yellow Essence.

Go to Han's bar in Tairon, just after the military invades the city in Chapter 8. There will be four soldiers that you can kill there. Use the Vigoorian Flail to kill them all, using only the Cremator attack to kill each one. You will typically gain 1,500 to 2,000 Essence for killing all four of them. Enter Han's bar, then exit it to have them respawn. You can repeat the process as many times as desired. There is also a save point next to Han's bar. Save the game every few times you do this in case you die.

- More items

Do not pass up the dead ninjas that are lying around. They have items on them.

- Obtaining rewards

Talk to the shopkeeper every time you see him. This is when he will collect your Golden Scarabs. He will give you rewards after every several Scarabs. **Note:** When the Hurricane Pack from Xbox Live is installed, the Scarab rewards will change to the following:

Wooden Sword: 5 Scarabs
 Armlet of Fortune: 10 Scarabs
 Vigoorian Flail: 15 Scarabs
 Armlet of the Moon: 20 Scarabs
 Dabilahro: 25 Scarabs
 Armlet of the Sun: 30 Scarabs
 Armlet of Benediction: 35 Scarabs
 Jewel of Demon Seal: 40 Scarabs
 Armlet of Tranquility: 45 Scarabs
 Dark Dragon Blade: 50 Scarabs

- Unlock safe in monk's room

To unlock the safe in the monk's room for the first time you need to enter this combination: press Analog-Stick Left until you reach "2", then press X. Press Analog-stick Right until "7", then press X. Press Analog-stick Right until "1", then press X. Press Analog-stick Left until "2", then press X. If done correctly, each time you press X a blue light should turn on, until you see four blue lights and the elevator to the underground cemetery opens. The combination is the Monk's birthday as he states in the diary (27th day on the 12th month). You can now get the Book Of The Eons from the safe.

When opening the monk's safe for Life Of The Gods, the combination is different. The code is left to 1, right to 4, left to 1, and right to 0.

After the flood drops you into the room with the elevator and the long tunnel you can swim through, take the underwater elevator up to the monk's room. Dispatch the three Spider Ninja and go to the safe. The new combination is right to 1, left to 4, right to 1, left to 0. If you also reread his diary, it will mention that you ripped him off and will then tell you that the new password is his daughter's birthday.

- Defeating Alma

To defeat Alma (red greater fiend), equip the Vigorian Flails. It is recommended that they be completely leveled up. With the Vigorian Flail, you can still hurt Alma greatly even when she is in the air. **Note:** The shuriken, incendiary shuriken, and bow cannot hurt her; they just bounce off.

- Defeating Black Spider Ninjas

Jump off the wall and use the X attack to smash down on top off them. Use this repeatedly, but be careful of the incendiary shurikens that they throw.

- Defeating Doku

Keep using the Flying Swallow attack (A towards the enemy, then Y). Every time you hit him, roll back, then jump. After that, try the Electric Ninpo attack. Then, repeat the process. If Doku keeps blocking the Flying Swallow attack, keep attacking him with it until it hits him. When he throws his sword, you can either jump over it, or roll and jump backwards. When he is doing his combo attack, attack him when he is at the last attack of his combo.

- Defeating Spirit Doku

To defeat Doku the second time you fight him quickly and without getting hit, simply use the Ninpo attack "The Art Of The Inferno". If it is level 3, you can kill him in about six hits.

- Defeating the Dragon Boss

To defeat him, try to level up your Lightning Ninpo to the maximum. Constantly run left or right. When he flaps his wings you will take a little block damage. The only way to hit him without getting in the lava is to hit his head when he lays it down momentarily. Try using the Flying Air Dash attack. He will try to grab you immediately afterwards; throw in a Ninpo just after that attack. If you need to use a Great Devil Elixer, it will be useful.

- Defeating Spirit Piranha

These enemies can kill you very quickly and are extremely difficult to get away from. They tend to leave a high amount of red Ki orbs. Simply use the Fire Wheels Ninpo and run through them. You should get enough red orbs to replenish your Ki. Also, use the Bracelet that enhances the red orbs.

- Defeating Worms

You will fight several of these Worms. They can be cheap if you do not know what to do. Using the Whirlwind Shiruken is the key. Throw out a maximum of three when they appear from the holes, then block or dodge. Repeat this for an easy victory.

- Defeating Zombies

Use the diving Y attack that takes off their head. It will not kill them, but they will be blind. Also, when facing the zombies under the cathedral and one of them happen to lunge at you and starts biting, press X + A as quickly as possible to kick it off and reduce the amount of damage that you receive.

- Dragon sword extra attacks

360 Turn: Press X after you have landed on the ground. You can do several combos starting with X after this blow.

Quick Charge: Press Y after you have landed on the ground.

Roll Attack Plus Violent Gale: Press Right (or another direction), Right + X, X(3); level 2.

Roll Attack Plus Izuna Drop: Press Right, Right + X, X, Y, X(3), Y; level 2, you must have bought the Izuna Drop Scroll in order to do this attack.

- Item locations

Lives Of 1000 Gods

Chapter 1

1. Ninja Fortress

Chapter 4

2. Area of Tairon near Lily Door (hang from blue rail, then cross on blue wire)
3. After defeating Chapter 6 Boss

Chapter 7

4. Kill 60 Fiends in the area where you got the Holy Grail (before flooding)
5. After defeating Suspension Bridge room Boss

Chapter 10

6. Kill 60 Fiends in the Peristyle Passage (Hall of Balance 1)

Chapter 12

7. Kill 60 Fiends in the area that you fought Doku (platform puzzle)
8. Kill 60 Fiends at the bottom of stairway to Imperial Palace (long stairway)
9. After defeating Flame Dragon Boss

Chapter 13

10. Tairon - after portal activation (go into portal near Great Bridge)- kill 60 fiends

Life Of The Gods

Chapter 2

1. Broken bridge (just before Hayabusa village, water jump to get across)
2. Hayabusa Village (place statue head on statue)

Chapter 3

3. Main Deck (small room)
4. Fore Cabin

Chapter 4

5. Flip over blue rail (next to note Ayane gives you about paying attention to the color blue)
6. 1, 2, or 3 Scarabs

Chapter 6

7. Monastery Annex
8. Underground Cemetery (upper area)

Chapter 7

9. Suspension bridge room
10. Monk's safe (second time)

Chapter 9

11. Military Warehouse (break box on floor)
12. Military Base (bottom of stairs in control room)
13. In chest after train wreck

Chapter 10

14. Hall of Balance 2 (in chest)
15. In worm hole after defeating two worms
16. Entrance to Underground Sanctuary (wall run across door)

Chapter 11

- 17. Moat of Zarkhan (next to save point)
- 18. Moat of Zarkhan (underwater labyrinth, right before silver medallion)

Chapter 12

- 19. Room you fought Doku (upper level)
- 20. Room you fought Doku (upper level)
- 21. Break statue head with hammer
- 22. Underwater near Zarkhan Falls
- 23. Magma Cavern (Path of the Flame)

Chapter 13

- 24. After defeating Flame Dragon (Magma Cavern)
- 25. In chest after breaking door near Great Bridge (wall run)
- 26. Pyramid (in chest)

Chapter 14

- 27. Labyrinth

Jewel Of The Demon Seal

Chapter 7

- 1. Suspension Bridge Room (throne)

Chapter 10

- 2. Aqueduct 3 (take elevator down)

Chapter 11

- 3. Monks safe (3rd time)

Chapter 12

4. Ice Cavern (after defeating ice beast)

Chapter 13

5. Hayabusa Village (break door with hammer)

6. Pyramid (light altar with Fire Ninpo)

Weapons

Chapter 2

1. Bow (Hayabusa village, same room as Masamura's shop icon)

Chapter 4

2. Nunchaku (found on dead ninja near clock tower)

3. Windmill Shuriken (alley near Han's Bar)

Chapter 6

4. Vigaroon Flail (Underground Cemetery; near Ritual Room)

Chapter 8

5. War Hammer (go back into Monastery after defeating Alma)

6. Strongbow (across from Military Gate, get there with Skull key)

Chapter 9

7. Dabilahro (received after 43 scarabs)

Chapter 11

8. Speargun (on dead ninja near Masamura's shop icon)

Chapter 12

9. Kitetsu (pick up after defeating Doku)

- Ninja Gaiden passwords

Level	Password
1	L, X, A, Y, A, X
2	A, X, X, R, Y, A
3	X, Y, B, R, L, X
4	B, R, A, B, Y, Y
5	X, A, Y, X, L, L
6	R, Y, R, L, A, X


- Ninja Gaiden 2 passwords

Level	Password
1	A, A, B, X, Y, R
2	X, L, R, B, B, A
3	L, Y, B, A, R, R
4	A, L, X, Y, Y, B
5	R, A, A, B, X, L
6	Y, L, R, A, Y, R
7	B, B, X, Y, A, L


- Ninja Gaiden 3 passwords


Level	Password
1	B, Y, R, L, X, A
2	A, R, R, Y, A, L
3	L, B, R, Y, L, Y
4	R, R, B, A, Y, X
5	Y, A, B, X, R, X
6	B, X, X, A, X, Y
7	X, R, X, Y, Y, L

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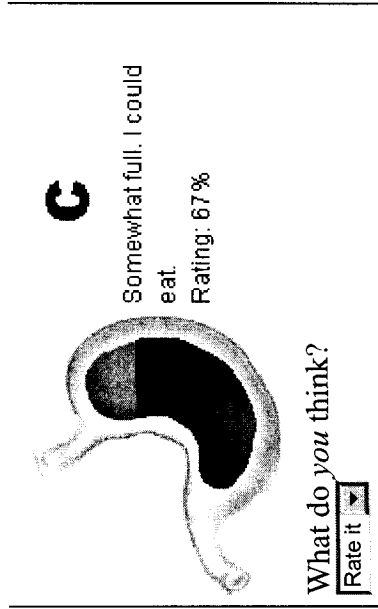
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X **Ninja Gaiden**
xbox

Thursday, December 16, 2004 Posted: 12:00 AM PT



Strategy Guide

Always have starting costume

At the main menu, highlight the "New Game" option, then hold L + R and press A. If you entered the code correctly, you will hear the sound of a scream. Ryu will continue using his starting blue costume throughout the game.

Alternate costumes

Successfully complete the game on the normal or hard difficulty settings. Then, hold L while selecting the "New Game" option at the opening menu to wear the Ninja Of The Future costume. Successfully complete the game on the very hard difficulty setting to unlock Ryus Fiend Costume. It is the same blue skin obtained in Chapter 14 after defeating Doku for the second time.

After installing the Hurricane Pack: Volumes 1 or 2 on Xbox Live, hold Black while selecting a level in master tournament for the Evil Ryu costume. Hold White while selecting a level in master tournament for the Dead Or Alive Ninja costume.

Dablahro Sword

Give 20 Scarabs to Muramasa to unlock the Dablahro Sword. Note: In successive mode you do not get it again until you give 43 Scarabs to Muramasa.

Plasma Saber

Successfully complete the game on the normal difficulty setting. A new sword called the Plasma Saber (which resembles a lightsaber from Star Wars) will

now be unlocked.

Plasma Saber Mk. II

Successfully complete the game on the very hard difficulty setting to unlock the Plasma Saber Mk. II.

Skip FMV sequences

Press Start, A, Start to advance past an FMV sequence. Note: This does not work all of the time.

All FMV sequences

Successfully complete the game on the normal or hard difficulty settings to unlock all FMV sequences.

Very hard difficulty

Successfully complete the game on the normal or hard difficulty settings to unlock the very hard difficulty setting.

Original Ninja Gaiden mini-game

Give 50 Scarabs to Muramasa to unlock the original Ninja Gaiden game. This does not have to be done in a single game play-through. You can continue from a completed game save and collect the Scarabs that were originally missed until you have the required 50 Scarabs. After giving them to Muramasa, you will get the Ninja Gaiden disc to be used at the arcade machine at Hans Bars first floor.

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Get a "Master Ninja" rank in all levels on the normal difficulty setting to unlock the original Ninja Gaiden 2: The Dark Sword Of Chaos game. Alternately, first unlock Ninja Gaiden. Then go to the Clock Tower Plaza of Tairon. Get on the ledge above the multicolored door that leads to Pleasure Street (where you flip the switch to unlock that door). Aim your bow at the clock tower across the street. Shoot the face of the clock and a treasure chest will appear on the building that is across the street. Jump down, and enter the doorway across the street with the stairs. Climb to the top, and open the chest to unlock the Ninja Gaiden 2 disc.

Original Ninja Gaiden 3: The Ancient Ship Of Doom mini game

Get a "Master Ninja" rank in all levels on the hard or very hard difficulty settings to unlock the original Ninja Gaiden 3: The Ancient Ship Of Doom game. Alternately, first unlock Ninja Gaiden 2. Go to the Peristyle Passage (the ceremonial room in the Aqueeducts, just before the Boss fight with the giant fossil bird). It is next to the Hall of Balance. Triangle Jump back up to the top of the broken pillar where a Scarab was previously hidden. You will now find the disc for Ninja Gaiden 3 at that location.

Playing classic games easier

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Ninja Gaiden (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQue... Page 4 of 13
Instead of going to the first floor of Hans Bar, use the following trick to start the games from the main menu. Successfully complete the main game while any classic Ninja Gaiden disc is in Ryus inventory. This will unlock another main menu option that will allow you to play the classic games from there, without going to Hans Bar.

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Give 15 Scarabs to Muramasa to unlock the Armlet Of Benediction.

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Give 30 Scarabs to Muramasa to unlock the Armlet Of Fortune.

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Life of the Gods

Give one Scarab to Muramasa to unlock the Life of the Gods.

Sprit of the Devils

Give 10 Scarabs to Muramasa to unlock the Sprit of the Devils.

Unlabored Flawlessness

Upgrade the wooden sword completely to receive its true form, the Unlabored Flawlessness. It is a large weapon which you swing like the war hammer and Dabilahro, and has a very powerful Ki attack. This weapon makes Boss fights easy.

War Hammer

Exhibit C Page 158

After defeating the flying female Boss that breaks through the stained glass, immediately when you start the next level run back into the doors. Go past all the debris and you can find the War Hammer in the area where you fought the Boss.

Windmill Shuruken

Go to Hans bar but do not go in the front of the club. There is an alley that has blue striped walls. Run on these blue stripes and it should lead you to a platform with an silver Xbox that replenishes your health and a metal plate that holds the Windmill Shuruken.

In-game reset

While playing a game, press Start + Back to return to the main menu.

Special attack

Press Y + B to unleash a super attack that will seriously hurt anyone.

Kill enemies quickly

To kill an enemy very fast, jump towards them fairly close using A, then quickly tap Y immediately before you hit them. You should either throw them with the guillotine throw or slice their heads off. If they keep trying to get off the ground, tap Y again to pin them down or cut their head off. This is useful when you need some extra money, are almost dead, or when you just simply want to get through the section quickly because of frustration.

Finishing kill

While a foe is on the ground, walk up to it and press Y. This will instantly kill almost any foe.

Less battle damage

When you are grabbed by an enemy or a Boss such as the Dragon, mash the buttons quickly to escape without taking full damage.

Longer wall running

When you are about to fall from wall running too far, jump forward towards the wall again. You will start to wall run again.

Easy Essence

Killing a foe without using Y will give you five times more Essence. Also in Chapters 6 and 7, you will encounter the skeleton dino Boss. After you defeat him, climb down towards the new opening he made in the floor, but stop at the save location. Turn around with your Nunchakun and jump up to the bats. Once you reach them, kill no more than two to four bats and charge your super attack taking in two Essence Orbs. Then, unleash the attack and gather up to 2,000 Essence each time. To replenish the bats, jump back to the save point and repeat. The bats will not hurt you enough to kill, and will randomly give you

When opening the monks safe for Life Of The Gods, the combination is different. The code is left to 1, right to 4, left to 1, and right to 0.

After the flood drops you into the room with the elevator and the long tunnel you can swim through, take the underwater elevator up to the monks room. Dispatch the three Spider Ninja and go to the safe. The new combination is right to 1, left to 4, right to 1, left to 0. If you also reread his diary, it will mention that you ripped him off and will then tell you that the new password is his daughters birthday.

Defeating Alma

To defeat Alma (red greater fiend), equip the Vigorian Flails. It is recommended that they be completely leveled up. With the Vigorian Flail, you can still hurt Alma greatly even when she is in the air. Note: The shuriken, incendiary shuriken, and bow cannot hurt her; they just bounce off.

Defeating Black Spider Ninjas

Jump off the wall and use the X attack to smash down on top off them. Use this repeatedly, but be careful of the incendiary shurikens that they throw.

Defeating Doku

Keep using the Flying Swallow attack (A towards the enemy, then Y). Every time you hit him, roll back, then jump. After that, try the Electric Ninpo attack. Then, repeat the process. If Doku keeps blocking the Flying Swallow attack, keep attacking him with it until it hits him. When he throws his sword, you can either jump over it, or roll and jump backwards. When he is doing his combo attack, attack him when he is at the last attack of his combo.

Defeating Spirit Doku

To defeat Doku the second time you fight him quickly and without getting hit, simply use the Ninpo attack "The Art Of The Inferno". If it is level 3, you can kill him in about six hits.

Defeating the Dragon Boss

To defeat him, try to level up your Lightning Ninpo to the maximum. Constantly run left or right. When he flaps his wings you will take a little block damage. The only way to hit him without getting in the lava is to hit his head when he lays it down momentarily. Try using the Flying Air Dash attack. He will try to grab you immediately afterwards; throw in a Ninpo just after that attack. If you need to use a Great Devil Elixer, it will be useful.

Defeating Spirit Piranha

These enemies can kill you very quickly and are extremely difficult to get away from. They tend to leave a high amount of red Ki orbs. Simply use the Fire Wheels Ninpo and run through them. You should get enough red orbs to replenish your Ki. Also, use the Bracelet that enhances the red orbs.

Defeating Worms

You will fight several of these Worms. They can be cheap if you do not know what to do. Using the Whirlwind Shiruken is the key. Throw out a maximum

of three when they appear from the holes, then block or dodge. Repeat this for an easy victory.

Defeating Zombies

Use the diving Y attack that takes off their head. It will not kill them, but they will be blind. Also, when facing the zombies under the cathedral and one of them happen to lunge at you and starts biting, press X + A as quickly as possible to kick it off and reduce the amount of damage that you receive.

Dragon sword extra attacks

360 Turn: Press X after you have landed on the ground. You can do several combos starting with X after this blow.

Quick Charge: Press Y after you have landed on the ground.

Roll Attack Plus Violent Gale: Press Right (or another direction), Right + X, X(3); level 2.

Roll Attack Plus Izuna Drop: Press Right, Right + X, X, Y, X(3), Y; level 2, you must have bought the Izuna Drop Scroll in order to do this attack.

Item locations

Lives Of 1000 Gods

Chapter 1

1. Ninja Fortress

Chapter 4

2. Area of Tairon near Lily Door (hang from blue rail, then cross on blue wire)
3. After defeating Chapter 6 Boss

Chapter 7

4. Kill 60 Friends in the area where you got the Holy Grail (before flooding)
5. After defeating Suspension Bridge room Boss

Chapter 10

6. Kill 60 Friends in the Peristyle Passage (Hall of Balance 1)

Chapter 12

7. Kill 60 Fiends in the area that you fought Doku (platform puzzle)
8. Kill 60 Fiends at the bottom of stairway to Imperial Palace (long stairway)
9. After defeating Flame Dragon Boss

Chapter 13

10. Tairon - after portal activation (go into portal near Great Bridge)- kill 60 fiends

Life Of The Gods

Chapter 2

1. Broken bridge (just before Hayabusa village, water jump to get across)
2. Hayabusa Village (place statue head on statue)

Chapter 3

3. Main Deck (small room)
4. Fore Cabin

Chapter 4

5. Flip over blue rail (next to note Ayane gives you about paying attention to the color blue)
6. 1, 2, or 3 Scarabs

Chapter 6

7. Monastery Annex
8. Underground Cemetery (upper area)

Chapter 7

9. Suspension bridge room
10. Monks safe (second time)

Chapter 9

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- 11. Military Warehouse (break box on floor)
 - 12. Military Base (bottom of stairs in control room)
 - 13. In chest after train wreck
- Chapter 10
- 14. Hall of Balance 2 (in chest)
 - 15. In worm hole after defeating two worms
 - 16. Entrance to Underground Sanctuary (wall run across door)

- Chapter 11
- 17. Moat of Zarkhan (next to save point)
 - 18. Moat of Zarkhan (underwater labrynth, right before silver medallion)

- Chapter 12
- 19. Room you fought Doku (upper level)
 - 20. Room you fought Doku (upper level)
 - 21. Break statue head with hammer
 - 22. Underwater near Zarkhan Falls
 - 23. Magma Cavern (Path of the Flame)

- Chapter 13
- 24. After defeating Flame Dragon (Magma Cavern)
 - 25. In chest after breaking door near Great Bridge (wall run)
 - 26. Pyramid (in chest)

- Chapter 14
27. Labrynth
- Jewel Of The Demon Seal
- Exhibit C Page 164

- Chapter 7
- 1. Suspension Bridge Room (throne)

Chapter 10

2. Aqueduct 3 (take elevator down)

Chapter 11

3. Monks safe (3rd time)

Chapter 12

4. Ice Cavern (after defeating ice beast)

Chapter 13

5. Hayabusa Village (break door with hammer)
6. Pyramid (light altar with Fire Ninpo)

Weapons

Chapter 2

1. Bow (Hayabusa village, same room as Masamuras shop icon)

Chapter 4

2. Nunchaku (found on dead ninja near clock tower)
3. Windmill Shuriken (alley near Hans Bar)

Chapter 6

4. Vigaron Flail (Underground Cemetery; near Ritual Room)

Chapter 8

5. War Hammer (go back into Monastery after defeating Alma)
6. Strongbow (across from Military Gate, get there with Skull key)

Chapter 9

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7. Dablahro (received after 43 scarabs)

Chapter 11

8. Speargun (on dead ninja near Masamuras shop icon)

Chapter 12

9. Kitetsu (pick up after defeating Doku)

Ninja Gaiden passwords

LevelPassword

- 1L, X, A, Y, A, X
- 2A, X, X, R, Y, A
- 3X, Y, B, R, L, X
- 4B, R, A, B, Y, Y
- 5X, A, Y, X, L, L
- 6R, Y, R, L, A, X

Ninja Gaiden 2 passwords

LevelPassword

- 1A, A, B, X, Y, R
- 2X, L, R, B, B, A
- 3L, Y, B, A, R, R
- 4A, L, X, Y, Y, B
- 5R, A, A, B, X, L
- 6Y, L, R, A, Y, R
- 7B, B, X, Y, A, L

Ninja Gaiden 3 passwords

LevelPassword

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1B, Y, R, L, X, A
2A, R, R, Y, A, L
3L, B, R, Y, L, Y
4R, R, B, A, Y, X
5Y, A, B, X, R, X
6B, X, X, A, X, Y
7X, R, X, Y, Y, L

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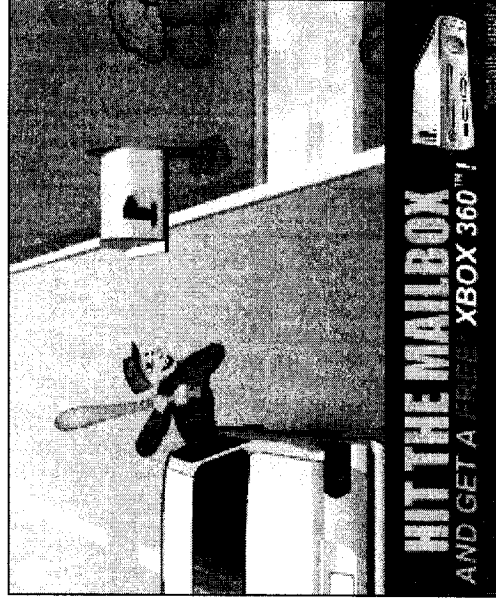
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Tiger Woods PGA Tour 2004

(Last updated: October 27, 2003)



Strategy Guide

- All golfers
- All courses

Enter "CANYOUPICKONE" as a case-sensitive password to unlock all golfers. If you entered the code correctly, Tiger Woods will say "Oh yeah!"

Enter "**ALLTHETRACKS**" as a case-sensitive password to unlock all courses. If you entered the code correctly, Tiger Woods will say "Oh yeah!".

- All golfers and courses

Enter "**THEKITCHENSINK**" as a case-sensitive password to unlock all golfers and courses. If you entered the code correctly, Tiger Woods will say "Oh yeah!".

- Play as Ace Andrews

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Enter "**THENEWLEFTY**" as a case-sensitive password. If you entered the code correctly, Tiger Woods will say "Oh yeah!".

- Target shootout

Enter "**sherwood target**" as a case-sensitive password. If you entered the code correctly, Tiger Woods will say "Oh yeah!". This unlocks a three hole shootout against Tiger on the Sherwood Country Club course.

- Money bonus

Play the game with a saved game from Tiger Woods PGA Tour 2003, to get a \$50,000 bonus when starting a new character. Use all your money on "Attributes" and increase them all evenly in 5% increments. When you join the tour, assuming that you have had enough practice, you will be at even (most likely better) skill then the rest of the field. Make the first upgrades only after getting your first sponsorship. If you increase the percentages evenly and only buy some equipment through the end of January, you should be on top of the leader board and swimming in cash for the beginning of the "Hard" courses and players in February.

- Course for greater success

Play and successfully complete the World Tour. When you power up, put your points mostly into "Power", "Power Boost", and "Putting". Next complete the scenarios. Power up as desired. Gold medals bring in \$75,000 to \$100,000. Silver medals bring in \$50,000 to \$75,000. Bronze medals bring in \$35,000 to \$37,500. If you complete the above, "Tournaments", "Real-Time Events", and the other options for game play become easy.


- Bigfoot sighting on Sahalee CC

Directly behind the 17th green at Sahalee CC are two yellow bushes. Behind the left bush there is a Bigfoot looking out from behind a tree.


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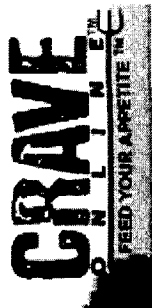
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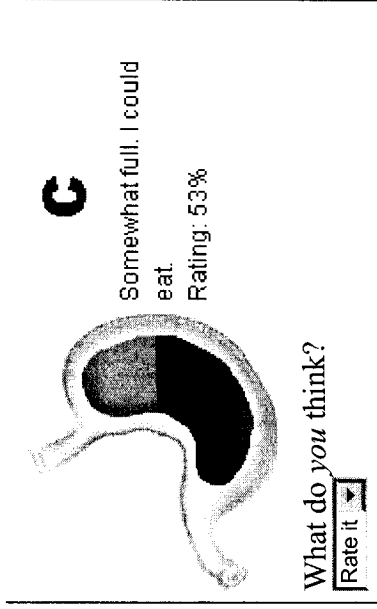
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XBOX Tiger Woods PGA Tour 2004

Thursday, December 16, 2004 Posted: 12:00 AM PT



Strategy Guide

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- Cheat mode

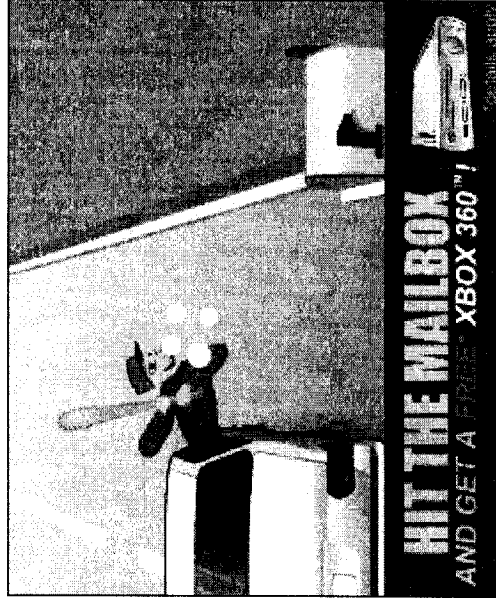
Enter the Hacking engine in the game. Enter "CHEAT.EXE" and the cheat menu will be unlocked. Enter one of the following codes to activate the corresponding effect:

Infinite health



Enter The Matrix

(Last updated: June 19, 2003)



Strategy Guide

Enter "7F4DF451" as a code.

Infinite focus

Enter "69E5D9E4" as a code.

Maximum firepower

Enter "0034AFFF" as a code.

Infinite ammunition

Enter "1DDF2556" as a code.

Fast focus restore

Enter "FFF0020A" as a code.

Bonus test level

Enter "13D2C77F" as a code.

Sparks' Construct in training mode

Enter "13D2C77F" or "1302C77F" as a code.

Enemies cannot hear you

Enter "4516DF45" as a code.

Enemies cannot see you

Enter "FFFFFFF1" as a code.

Taxi Driving

Enter "312MF451" as a code.

Enter "D5C55D1E" as a code.

Multi-player fighting

Faster logos

Enter "7867F443" as a code.

- Hacking engine tools

In Hacking engine (which is accessed from the title screen), there are a number of directories and tools that can be useful (such as spawning a weapon within The Matrix.):

Command	Directory	Result
CLS	A:\SYSTEM	Clear the screen of text
DIR [location]	A:\SYSTEM	List files and folders
ECHO [text]	A:\SYSTEM	Display indicated text
EXIT	A:\SYSTEM	Exit Hacking engine
HELP [command]	A:\SYSTEM	Extended help for a command
LOGIN	A:\SYSTEM	Change drives
READ	A:\SYSTEM	Read *.txt files
REBOOT	A:\SYSTEM	Reboot system, remove unlocked commands
CHEAT [code]	A:\TOOLS	Cheat code entry command
VIBRATION [1-100]	A:\TOOLS	Test vibration feature
BEEP [1-8]	A:\TOOLS	Test beeps
DECODE [code]	B:\TOOLS	Decode hint
DROP JXTRR10	B:\TOOLS	Weapon drop at Drainage Canal
DROP PNSRZ10	B:\TOOLS	Weapon drop at North Concourse
DROP RKHMS10	B:\TOOLS	Weapon drop at Airport Tunnel
DROP JDZMT10	B:\TOOLS	Weapon drop at 2nd Floor West (Chateau)
DROP ZKHBD10	B:\TOOLS	Weapon drop at Courtyard (Chateau)
DROP RHFTQ10	B:\TOOLS	Weapon drop at Skyscraper

DROP ZSZQH10 B:\TOOLS
DROP JDHQL10 B:\TOOLS
DROP B1AXXF2 B:\TOOLS
PLAY B:\TOOLS
TRACEKILL B:\TOOLS
VIEW B:\TOOLS
VIRTUAL B:\TOOLS

Weapon drop at Warehouse (Chinatown)
 Weapon drop at Transformer Field (power plant)
 Weapon drop at 2nd Floor PO Boxes
 Play *.fmv files
 Kills traces
 View *.img files
 Access virtual drive

- Morpheus message

In the Hacking engine, instead of using "GUEST", you can LOGIN as "**FREMIND**" or "**COWBOYCURTIS**" to hear a message from Morpheus.

- Wireless message

Enter the following commands:

DIR LOGOS:
DIR V:
DIR RAM:
 Passcode **8ram**
 3 digit code **942**
DIAL.EXE
 Passcode **THISISNOTREAL**
 Passcode **FROZENFISH**

- Swordfight

To unlock the swordfight, follow these steps. Open the Hacking program from the main menu. Open a file that has the game completed. **Note:** You must have completed the game first in order for this cheat to work; and the game file you select at the Hacking menu must have the game completed. Type "**LOGIN**" and press Enter. Type "**GUEST**" and press Enter. Type "**DIR**", then a space. DIR should now appear in your command list. Access the B Drive through the DIR command. Select TOOLS from the B Drive. It will be locked and will ask you for an access code. The access code consists of 1s and 0s. You must guess the access code, as it is different each time. It is only five digits long. Once you have access to the TOOLS on the B Drive, type all the .EXE files (without

the .EXE after them). For example, type **"DECODE"** then a space. DECODE will now appear in the command list. Repeat this for all other .EXE files in the TOOLS folder in the B Drive. Now, access VIRTUAL on your command list. Type in **"FROZENFISH"** as the password. An authentication test will start. An image of a Chinese symbol will appear, but it will be scrambled. The image is broken into 9 squares, and each square will have five different choices. You must change all the pieces so that a complete image appears. You have a limited amount of time to do this. **Note:** Click [here](#) to view both the red and blue Chinese character puzzle solutions. Once you guess a correct image, the timer will stop and you will be taken back to the hacking screen. Look at the top of the screen. If it says "Solution: Blue", then the line will be traced and you will have to enter **"TRACEKILL"** and then press enter as fast as possible or all progress will be lost. Once you enter TRACEKILL, you will have to start back at accessing VIRTUAL on your command list. However, if it says "Solution: Red", then you will hear a message from Neo and get access to the V Drive. Open the V Drive and get all the commands from the TOOLS folder on your command list. Open the ROOTSEARCH program. Now, open the ROOT folder in the B Drive and get the two commands there on your command list. Enter the MAIL command and type **"THISISNOTREAL"** as the password and type **"YES"**. You will get a list of phone numbers:

001-949-555-0112
 001-714-555-0187
 001-213-555-0142
 001-310-555-0111
 001-949-555-0101

Select the DIAL command and dial **001-949-555-0101**. You should get a message from Persephone. Next dial **001-310-555-0111**. You will get you a message from Trinity. She will give you a number. Select PORTKEY and enter the number. She will start to talk to you. Type **"NO"** to both questions and she will give you a program called CRACK on your command list. Open it, then type **"8RAM"**. It should look like this: "CRACK 8RAM". You now have access to the RAM drive. Go to DIR on your command list and access the RAM drive. A list of folder names will appear. Open the TRINITY folder. Get the Training command on your DIR by typing **"TRAINING"** then a space. Go to your command list and select TRAINING. On you command list, a file called SWORD.DSK will come up. Select it. It has now uploaded the sword onto you character in the Matrix. Quit the hacking program and select "Save Progress". You can use the sword when you start that game file. It can be used in any stage, but will only appear when fighting enemies by pressing Punch + Kick. If you press Action when approaching an enemy (as if you were going to disarm them). Instead of doing your disarm move, you will take out the sword and slice them up, killing them instantly. **Note:** You also have to enter it again when you turn off the game. Go to the Hacking program, select that file again, select TRAINING, then SWORD.DSK.

- Additional options

Go into the Hacking option and type "**DIR**". This will bring up a list (System.exe, Tools.exe, etc.). Under system, login as "**GUEST**". This will bring up the B directory. Go to tools under B's directory and it will ask for a five digit binary code. **Note:** This code is random each time. Enter the correct code to access more options such as "DECODE.EXE", "PLAY.EXE", and "VIEW.EXE".

Note: The list of possible binary codes includes:

```
11000
11001
10100
10010
10011
10001
01001
00101
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- Hack into The Matrix

Once you have saved, you can select the Hacking option and begin to work on hacking into The Matrix itself. As the Matrix is quite simply a simulation, its rules are no different to a computer systems. This allows you to not only access all stored files, but you can change the physical laws of the system (as mentioned in the "cheat" descriptions) Laws like gravity can be bent, for a greater time/effect than the limited focusing alone. To take advantage of the Hack System's abilities, you will need to know exactly what to enter following the command prompt (default A Drive standard (A:)): Enter "**DIR**" to display directory choices. You can simply type [name of executable].**EXE** then press Enter. The executable will be opened. It is not the same with .TXT files, as you must type "**READ**" first before the text file selection is revealed in Command List. Simply type "**DIR**" then a space followed by B:\ for the contents of the B Drive to be revealed for selection, rather than typing individual filenames. After experiencing the rabbit hole for yourself, the "CHEAT.EXE" is invaluable for those with free minds looking to further enhance skills, and bend the rules of The Matrix. After opening the executable, you will be required to enter specific codes, which will directly alter rules of The Matrix, making it easier for you to utilize your ability to focus the mind, and other aspects. Use it wisely.

For an easy way to unlock cheat mode, at title screen select "Hack". Press any key when instructed. Once the system has loaded, type "**DIR**". You will eventually see various choices. One of these choices will be "TOOLS". Instead of typing it in, go all the way to the left where your options are "HELP and DIR". Click "DIR", then you will see the same choices on the screen above. Click on "TOOLS". From there you will see more choices "CHEAT.EXE" and so on. Click "CHEAT.EXE" and enter in any the codes.

- Multi-player mode

To access multi-player mode, follow the steps used to get the sword. However, instead go to the SPARKS folder and have a chat with him. Activate "HANDSHAKE.EXE". When he asks what program you sent him, say "HANDSHAKE". Then, wait until he is done talking. He will then upload Multi-player to you. Access it by going to "Load" and choosing the level just before the first one.

- Multi-player mode character selections

When entering multi-player mode, you do not get to choose which character(s) you would like to fight as. Instead, the Matrix selects two pre-set opponents depending on which scenario/background you choose. **Note:** Much like Morpheus vs. Neo in *The Matrix*, multi-player mode is essentially a training ground to hone your standard skills. Focus is unavailable for use in the Multi-player program. There is no background music to accompany these battles. Below is the list of backgrounds/environments that are used in the single player game itself, and the characters the CPU will select upon choosing a certain background:

The Pit - Player 1: Seraph, Player 2: Ballard
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 The Bedroom - Player 1: Cujo, Player 2: Vlad
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 The Alley - Player 1: Firebird Man, Player 2: Police Car Man

There are also two other levels which are famous areas from *The Matrix* film, which can only be found in multi-player mode:

The Dojo - Player 1: Niobe, Player 2: Trinity
 The Subway - Player 1: Morpheus, Player 2: Agent Smith

- Finding cheat codes

Every highway sign you see in *The Matrix: Reloaded* is a cheat for the game, *Enter The Matrix*.

- Cheat warning

When using various cheats, including "Infinite Health", "Infinite Focus", "Infinite Ammunition", and "Maximum Firepower", the game places a grenade or bomb immediately where you begin the level (only on some levels). It does not kill you, but will knock you for a loop. For example, on the "Agent On Board" level, you start out besides Axel. If one of those cheats are enabled, the bomb will blow up Axel and you will die, ending the game.

You must play this level without cheats in order to complete it. The way to get away from the bomb is run before it explodes.

- Alternate ending sequence

As Ghost, when you have to fight the man to see the oracle, you are supposed to lose. After you complete the game, go back and load that level. You can defeat him to get an alternate game ending.

- Ending sequence

Successfully complete the game on any difficulty setting. The ending sequence includes what appears to be a trailer for *The Matrix: Revolution*, the sequel to *The Matrix: Reloaded*.

- Spark's Training Construct

You start in a hallway full of doors. The doors never end. To find Spark's Training Construct go to the second red door you see on your right. Walk until you past the first red door, then you will see another red door Enter it. The other doors do not open. Once inside the "shooting range," you can participate in a test of skills. Press the red button and get ready. You will start out behind one of the tables and are told that you are caged in and have to fight. SWAT agents will start running from the back of the room in your area. If they get up to the 10 ft. mark, you will lose. Turn around, grab all the guns you can, and take them out. If you get more than twenty, it unlocks the other red door in the hallway. This is where you can engage in hand to hand combat with a never-ending supply of SWAT. This a very good opportunity to harness your fighting skills and find new moves.

- Chat with Spark

If you activated the "TRINITY" folder, type "**HANDSHAKE.EXE**" and press Enter. You will see a message from Spark. Type anything and press Enter. He will say that you sent him a file to download with a trojan virus. He will then say that he was playing. He will tell you something about you having access to his computer. Access the "DIR: folder and go to "LOGOS:". Go to your command list and select "EMP: in what he gave you. He will say that he was just kidding and will give you a gift in the loading screen. When he is done, you will hear a message from Neo. He will then say goodbye and shutdown the computer for you.

- Perfect accuracy

Get a gun (preferably a machine gun) and switch to first person view. Shoot and you will see that the bullets appear in a perfectly straight line, no matter what the weapon. This is extremely useful and works with any gun.

- Dodging bullets

When you are in a close area, Focus and do a wall run. Then, press Jump and move your character to the other wall. Next, do another wall run then press Jump. You should still be in Matrix mode. If done correctly, you will be able to dodge a lot of bullets.

- Longer wall flips

When doing a wall flip in Matrix mode, press Jump to do a longer flip. **Note:** You will not be able to fire your weapons while doing this. Be careful, and try not to use it around a lot of enemies.

- Running on walls

Press Focus while you are close to a wall. If done correctly, this should make your character run against the wall, then eventually do a cartwheel off it.

- Powerade

Approach a Powerade vending machine and press Action near the buttons on the machine. A Powerade will pop out.

- Game trailer

Allow the game to idle at the main menu. It will eventually play the preview trailer that was used to promote the game through the website.

- Flashlight

You may have trouble grabbing the flashlight which is actually a MP5 icon. To get it, take out your MP5 and waste its ammunition so that the gun is no longer in the inventory. The same goes for MP5 pistols. Once this is done, you can pick up the flashlight/MP5. Equip it to turn on the flashlight.

- Take out helicopter in Airport level

During your battle with the helicopter as Ghost, use the following strategy. Focus Run across the room to where the wall starts to curve. Back up against the wall facing the away from the large glass window. Hold Auto Aim and when the SWAT starts to jump down through the window, use your Focus and dispatch them with the least amount of ammunition possible. Go back to where you were against the wall earlier and wait for the helicopter to

pass over. When it does, it will shoot the wall. If you are in the correct location, it will not hit you. After you hear the bullets stop, run around the wall and the helicopter will be exposed without any protection. Use your Focus and dump at least a clip into it. Then, return to the wall and repeat the process. It only takes three to four times to take down the helicopter.

When playing as Ghost, and after you have just shot off the plane's tire, you will encounter the agent chopper. Change your weapon from the M95 Sniper Rifle to the SG - 552. Immediately stand almost as far back as you can go from your current position, so that you are not too close to where the chopper will appear. The moment you see it, use Focus and fire at the same time. The chopper should take major damage, but will leave your health at a minimum of about 20% before backing off. It will then try to attack you from the right; turn about 90 degrees to your right and get ready to blast it with the remaining ammunition. Make sure you that you do not stay too far back, because your shots may have less chance of hitting. You may get killed here if your reflexes are not fast enough. Also, if you defeat the chopper you may be left with just 1% health, but this is enough to get you out of there, let you save your game, and continue the war to save Zion.

- Engage in early duel with an agent in Answer The Phone level

Playing as Ghost on the city rooftops, after evading the many gaps and climbing the ladders, the agent that burst through the door drops down to destroy you. If you choose to hide behind the left wall and attempt to fire off rounds from around the corner at this agent, he will unsurprisingly dodge every bullet. If you Focus, you should be able to jump over the gap between you and the agent, and will be able to engage in hand-to-hand combat. However, at this point it is extremely hard to win; so continue to jump across to your left. Fall down into the lower area. Now instead of taking the cop out and running up the stairs, dispatch the cop(s), but wait around long enough to see the agent. If he fires at you, then Focus and bullet dodge to get close to him. You now have enough space to fully challenge this agent without being closed in. Battling an agent is more intense (and difficult) than taking on any groups of police or SWATs, because they can avoid all bullets, have shattering strength, and cannot be fully destroyed (except of course by Neo). You will have to Focus almost all of the time in order to knock him down, and inevitably you will soon find yourself on the brink of death. Run up the stairs and to the phone if low on health. **Note:** Although you cannot fully destroy the agent, you can temporarily defeat one until it moves into another body. This would seem impossible, but there is a way. Going back to the point where you climb up the ladder and the agent first drops down, instead of waiting for the agent to land, climb up the ladder. Before you even see the agent, start running and use your Focus to jump to the platform where the agent lands. Still holding Focus, move behind his position where he lands. Begin to kick him, and as he is off guard, he is very unlikely to counter. If you kick him enough, you should be able to knock him off the edge of the "platform" and down the gap, causing the agent to plummet to his death. Thus, you have temporarily defeated an agent. **Note:** If you should ever face Agent Smith, you would be wise not to underestimate him, he is the most skilled agent.

Let him strike first, and stay defensive. After this, lay it on him then back off and repeat.

- Defeating Sephere
- Defeat SWAT members

Take out any gun, go into Focus mode, then run and jump while shooting. When in Focus, your aim improves and the run and jump will help you dodge bullets.

- Defeating Agent Smith

It is possible to take down Agent Smith without a wall kick, even if temporarily. First, scoot back so he does not throw you, then equip any gun and fire. At the same time, go into Focus and while he is dodging the bullets you just fired, run in then punch or kick him until he goes down. Kicks are recommended because they are more powerful. Then, get out of there while still using Focus. When you are out of harms way, let off the Focus. **Note:** Doing this in cramped spaces such as hallways is not recommended unless absolutely necessary.



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I graduated in:

State:

Year:



S

Springfield High (1084)

MLK

Martin Luther King High (676)

T

Trinity High School (328)

IS

NEW! YOUR High School (820)

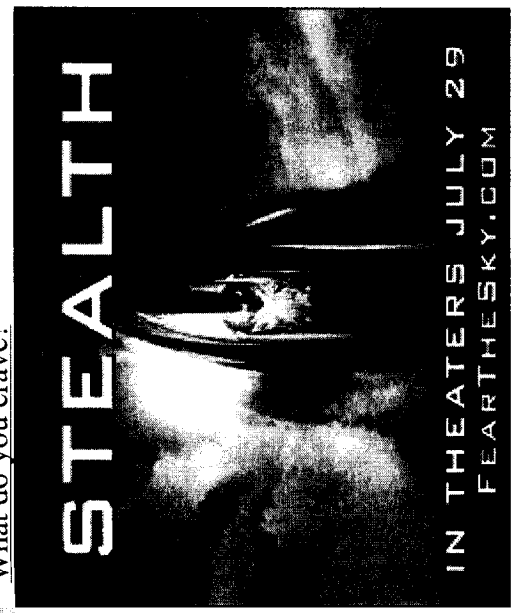
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Search For a Cheat

Crave Raves

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A
Stuffed, like a
Thanksgiving turkey!
Rating: 82%

What do *you* think?
Rate it

 **Enter The Matrix**

Thursday, December 16, 2004 Posted: 12:00 AM PT



Strategy Guide

Cheat mode

Enter the Hacking engine in the game. Enter "CHEAT.EXE" and the cheat menu will be unlocked. Enter one of the following codes to activate the corresponding effect:

Infinite health

Enter "7F4DF451" as a code.

Infinite focus

Enter "69E5D9E4" as a code.

Maximum firepower

Enter "0034AFFF" as a code.

Infinite ammunition

Enter "1DDF2556" as a code.

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Fast focus restore

Enter "FFF0020A" as a code.

Bonus test level

Enter "13D2C77F" as a code.

Sparks Construct in training mode

Enter "13D2C77F" or "1302C77F" as a code.

Enemies cannot hear you

Enter "4516DF45" as a code.

Enemies cannot see you

Enter "FFFFFFF1" as a code.

Taxi Driving

Enter "312MF451" as a code.

Multi-player fighting

Enter "D5C55D1E" as a code.

Faster logos

Enter "7867F443" as a code.

Hacking engine tools

In Hacking engine (which is accessed from the title screen), there are a number of directories and tools that can be useful (such as spawning a weapon within The Matrix.):

CommandDirectoryResult

<http://www.craveonline.com/games/cheats/xbox/cheat.php/Enter+The+Matrix>

```

CLSA:SYSTEMClear the screen of text
DIR [location]A:SYSTEMList files and folders
ECHO [text]A:SYSTEMDisplay indicated text
EXITA:SYSTEMExit Hacking engine
HELP [command]A:SYSTEMExtended help for a command
LOGINA:SYSTEMChange drives
READA:SYSTEMRead *.txt files
REBOOTA:SYSTEMReboot system, remove unlocked commands
CHEAT [code]A:TOOLScheat code entry command
VIBRATION [1-100]A:TOOLSTest vibration feature
BEEP [1-8]A:TOOLSTest beeps
DECODE [code]B:TOOLSDecode hint
DROP JXTRR10B:TOOLSWeapon drop at Drainage Canal
DROP PNSRZ10B:TOOLSWeapon drop at North Concourse
DROP RKHMS10B:TOOLSWeapon drop at Airport Tunnel
DROP JDZMT10 B:TOOLSWeapon drop at 2nd Floor West (Chateau)
DROP ZKHBD10 B:TOOLSWeapon drop at Courtyard (Chateau)
DROP RHFTQ10B:TOOLSWeapon drop at Skyscraper
DROP ZSZQH10B:TOOLSWeapon drop at Warehouse (Chinatown)
DROP JDHQL10B:TOOLSWeapon drop at Transformer Field (power plant)
DROP B1AXXF2B:TOOLSWeapon drop at 2nd Floor PO Boxes
PLAYB:TOOLSPlay *.fmv files
TRACEKILLB:TOOLSkills traces
VIEWB:TOOLSView *.img files
VIRTUAlB:TOOLSAccess virtual drive

```

Morpheus message

In the Hacking engine, instead of using "GUEST", you can LOGIN as "FREEMIND" or "COWBOYCURTIS" to hear a message from Morpheus.

Wireless message

Enter the following commands:

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```

DIR LOGOS:
DIR V:
DIR RAM:
Passcode 8ram
3 digit code 942

```

DIAL.EXE
Passcode THISISNOTREAL
Passcode FROZENFISH

Swordfight

To unlock the swordfight, follow these steps. Open the Hacking program from the main menu. Open a file that has the game completed. Note: You must have completed the game first in order for this cheat to work; and the game file you select at the Hacking menu must have the game completed. Type "LOGIN" and press Enter. Type "GUEST" and press Enter. Type "DIR", then a space. DIR should now appear in your command list. Access the B Drive through the DIR command. Select TOOLS from the B Drive. It will be locked and will ask you for an access code. The access code consists of 1s and 0s. You must guess the access code, as it is different each time. It is only five digits long. Once you have access to the TOOLS on the B Drive, type all the .EXE files (without the .EXE after them). For example, type "DECODE" then a space. DECODE will now appear in the command list. Repeat this for all other .EXE files in the TOOLS folder in the B Drive. Now, access VIRTUAL on your command list. T

ype in "FROZENFISH" as the password. An authentication test will start. An image of a Chinese symbol will appear, but it will be scrambled. The image is broken into 9 squares, and each square will have five different choices. You must change all the pieces so that a complete image appears. You have a limited amount of time to do this. Note: Click here to view both the red and blue Chinese character puzzle solutions. Once you guess a correct image, the timer will stop and you will be taken back to the hacking screen. Look at the top of the screen. If it says "Solution: Blue", then the line will be traced and you will have to enter "TRACEKILL" and then press enter as fast as possible or all progress will be lost. Once you enter TRACEKILL, you will have to start back at accessing VIRTUAL on your command list. However, if it says "Solution: Red", then you will hear a message from Neo and get access to the V Drive. Open the V Drive and get all the commands from the TOOLS folder on your command list. Open the ROOTSEARCH program. Now, open the ROOT folder in the B Drive and get the two commands there on your command list. Enter the MAIL command and type "THISISNOTREAL" as the password and type "YES". You will get a list of phone numbers:

- 001-949-555-0112
- 001-714-555-0187
- 001-213-555-0142
- 001-310-555-0111
- 001-949-555-0101

Exhibit C Page 199

Select the DIAL command and dial 001-949-555-0101. You should get a message from Persephone. Next dial 001-310-555-0111. You will get you a message from Trinity. She will give you a number. Select PORTKEY and enter the number. She will start to talk to you. Type "NO" to both questions and she will give you a program called CRACK on your command list. Open it, then type "8RAM". It should look like this: "CRACK 8RAM". You now have access to the RAM drive. Go to DIR on your command list and access the RAM drive. A list of folder names will appear. Open the TRINITY folder. Get the Training command on your DIR by typing "TRAINING" then a space. Go to your command list and select TRAINING. On you command list, a file called SWORD.DSK will come up. Select it. It has now uploaded the sword onto you character in the Matrix. Quit the hacking program and select "Save Progress". You can use the sword when you start that game file. It can be used in any stage, but will only appear when fighting enemies by pressing Punch + Kick. If you press Action when approaching an enemy (as if you were going to disarm them). Instead of doing your

Enter The Matrix (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, Ever... Page 6 of 10
disarm move, you will take out the sword and slice them up, killing them instantly. Note: You also have to enter it again when you turn off the game. Go to
the Hacking program, select that file again, select TRAINING, then SWORD.DSK.

Additional options

Go into the Hacking option and type "DIR". This will bring up a list (System.exe, Tools.exe, etc.). Under system, login as "GUEST". This will bring up the
B directory. Go to tools under Bs directory and it will ask for a five digit binary code. Note: This code is random each time. Enter the correct code to access
more options such as "DECODE.EXE", "PLAY.EXE", and "VIEW.EXE". Note: The list of possible binary codes includes:

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DIR". Click "DIR", then you will see the same choices on the screen above. Click on "TOOLS". From there you will see more choices "CHEAT.EXE" and
so on. Click "CHEAT.EXE" and enter in any the codes.

Multi-player mode Exhibit C Page 200

Enter The Matrix (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, Ever... Page 7 of 10

To access multi-player mode, follow the steps used to get the sword. However, instead go to the SPARKS folder and have a chat with him. Activate "HANDSHAKE.EXE". When he asks what program you sent him, say "HANDSHAKE". Then, wait until he is done talking. He will then upload Multi-player to you. Access it by going to "Load" and choosing the level just before the first one.

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Alternate ending sequence Exhibit C Page 201

As Ghost, when you have to fight the man to see the oracle, you are supposed to lose. After you complete the game, go back and load that level. You can

defeat him to get an alternate game ending.

Ending sequence

Successfully complete the game on any difficulty setting. The ending sequence includes what appears to be a trailer for The Matrix: Revolution, the sequel to The Matrix: Reloaded.

Sparks Training Construct

You start in a hallway full of doors. The doors never end. To find Sparks Training Construct go to the second red door you see on your right. Walk until you pass the first red door, then you will see another red door Enter it. The other doors do not open. Once inside the "shooting range," you can participate in a test of skills. Press the red button and get ready. You will start out behind one of the tables and are told that you are caged in and have to fight. SWAT agents will start running from the back of the room in your area. If they get up to the 10 ft. mark, you will lose. Turn around, grab all the guns you can, and take them out. If you get more than twenty, it unlocks the other red door in the hallway. This is where you can engage in hand to hand combat with a never-ending supply of SWAT. This is a very good opportunity to harness your fighting skills and find new moves.

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Longer wall flips

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Running on walls

Exhibit C Page 202

Powerade

Approach a Powerade vending machine and press Action near the buttons on the machine. A Powerade will pop out.

Game trailer

Allow the game to idle at the main menu. It will eventually play the preview trailer that was used to promote the game through the website.

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You may have trouble grabbing the flashlight which is actually a MP5 icon. To get it, take out your MP5 and waste its ammunition so that the gun is no longer in the inventory. The same goes for MP5 pistols. Once this is done, you can pick up the flashlight/MP5. Equip it to turn on the flashlight.

Take out helicopter in Airport level

During your battle with the helicopter as Ghost, use the following strategy. Focus Run across the room to where the wall starts to curve. Back up against the wall facing the away from the large glass window. Hold Auto Aim and when the SWAT starts to jump down through the window, use your Focus and dispatch them with the least amount of ammunition possible. Go back to where you were against the wall earlier and wait for the helicopter to pass over. When it does, it will shoot the wall. If you are in the correct location, it will not hit you. After you hear the bullets stop, run around the wall and the helicopter will be exposed without any protection. Use your Focus and dump at least a clip into it. Then, return to the wall and repeat the process. It only takes three to four times to take down the helicopter.

When playing as Ghost, and after you have just shot off the planes tire, you will encounter the agent chopper. Change your weapon from the M95 Sniper Rifle to the SG - 552. Immediately stand almost as far back as you can go from your current position, so that you are not too close to where the chopper will appear. The moment you see it, use Focus and fire at the same time. The chopper should take major damage, but will leave your health at a minimum of about 20% before backing off. It will then try to attack you from the right; turn about 90 degrees to your right and get ready to blast it with the remaining ammunition. Make sure you that you do not stay too far back, because your shots may have less chance of hitting. You may get killed here if your reflexes are not fast enough. Also, if you defeat the chopper you may be left with just 1% health, but this is enough to get you out of there, let you save your game, and continue the war to save Zion.

Engage in early duel with an agent in Answer The Phone level

Playing as Ghost on the city rooftops, after evading the many gaps and climbing the ladders, the agent that burst through the door drops down to destroy you. If you choose to hide behind the left wall and attempt to fire off rounds from around the corner at this agent, he will unsurprisingly dodge every bullet. If you Focus, you should be able to jump over the gap between you and the agent, and will be able to engage in hand-to-hand combat. However, at this point it is extremely hard to win; so continue to jump across to your left. Fall down into the lower area. Now instead of taking the cop out and running up the stairs, dispatch the cop(s), but wait around long enough to see the agent. If he fires at you, then Focus and bullet dodge to get close to him. You now have enough space to fully challenge this agent without being closed in. Battling an agent is more intense (and difficult) than taking on any groups of police or SWATs, because they can avoid all bullets, have shattering strength, and cannot be f

ully destroyed (except of course by Neo). You will have to Focus almost all of the time in order to knock him down, and inevitably you will soon find yourself on the brink of death. Run up the stairs and to the phone if low on health. Note: Although you cannot fully destroy the agent, you can temporarily defeat one until it moves into another body. This would seem impossible, but there is a way. Going back to the point where you climb up the ladder and the agent first drops down, instead of waiting for the agent to land, climb up the ladder. Before you even see the agent, start running and use your Focus to jump to the platform where the agent lands. Still holding Focus, move behind his position where he lands. Begin to kick him, and as he is off guard, he is very unlikely to counter. If you kick him enough, you should be able to knock him off the edge of the "platform" and down the gap, causing the agent to plummet to his death. Thus, you have temporarily defeated an agent. Note: If you should ever face Agent Smith, you would be wise not to underestimate him, he is the most skilled agent.

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Defeating Sephere

Let him strike first, and stay defensive. After this, lay it on him then back off and repeat.

Defeat SWAT members

Take out any gun, go into Focus mode, then run and jump while shooting. When in Focus, your aim improves and the run and jump will help you dodge bullets.

Defeating Agent Smith

It is possible to take down Agent Smith without a wall kick, even if temporarily. First, scoot back so he does not throw you, then equip any gun and fire. At the same time, go into Focus and while he is dodging the bullets you just fired, run in then punch or kick him until he goes down. Kicks are recommended because they are more powerful. Then, get out of there while still using Focus. When you are out of harms way, let off the Focus. Note: Doing this in cramped spaces such as hallways is not recommended unless absolutely necessary.

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nFri Jun 24 16:01:40 2005

UNITED STATES DISTRICT COURT

DENVER, CO

Receipt No. 100 261031
Cashier stacie

C.C. Number: SEE CC REC

03/06

DO Code Div No
4613 1

Sub Acct	Type	Tender	Amount
1:510000	N	4	190.00
2:006900	N	4	60.00

Total Amount \$ 250.00

FROM FREGRE & BENSON

05-CV-1186, FILING OF NEW COMPLAINT, SG

05-CV-0186-RPM-BNB

JS 44 (Rev. 11/04)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

<p>I. (a) PLAINTIFFS DAVID ALLISON, doing business as CHEAT CODE CENTRAL, a sole proprietorship</p> <p>(b) County of Residence of First Listed Plaintiff <u>Boulder</u> (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p>(c) Attorney's (Firm Name, Address, and Telephone Number) <u>303-607-3500</u> Christopher P. Beall, Paegre & Benson LLP 1700 Lincoln Str, #3200, Denver 80203</p>	<p>DEFENDANTS CRAVE ONLINE MEDIA, LLC A California limited liability company and ANDREW SIMON County of Residence of First Listed Defendant _____ (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.</p> <p>Attorneys (If Known)</p>
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<p>II. BASIS OF JURISDICTION (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:33%;">PTF <input type="checkbox"/> 1 DEF <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated or Principal Place of Business In This State</td> <td style="width:33%;">PTF <input type="checkbox"/> 4 DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input type="checkbox"/> 2 DEF <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td>PTF <input type="checkbox"/> 5 DEF <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> 3 DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> 6 DEF <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1 DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	PTF <input type="checkbox"/> 4 DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input type="checkbox"/> 2 DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	PTF <input type="checkbox"/> 5 DEF <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3 DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6 DEF <input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3 DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6 DEF <input type="checkbox"/> 6										

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p>PERSONAL INJURY</p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<p>PERSONAL INJURY</p> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p>PERSONAL PROPERTY</p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <p>PROPERTY RIGHTS</p> <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <p>SOCIAL SECURITY</p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <p>FEDERAL TAX SUITS</p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS			
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence <p>Habeas Corpus:</p> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act		

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding

2 Removed from State Court

3 Remanded from Appellate Court

4 Reinstated or Reopened

5 Transferred from another district (specify)

6 Multidistrict Litigation

7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing. (Do not cite jurisdictional statutes unless diversity):
17 USC Sec. 501, et seq. & 15 USC Sec. 1125(a)

Brief description of cause:
Copyright infringement and passing off

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ _____

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

DATE: June 29, 2005

SIGNATURE OF ATTORNEY OF RECORD: 

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.:

DAVID ALLISON, doing business as **CHEAT CODE
CENTRAL**, a sole proprietorship,

Plaintiff,

v.

JUPITER ELECTRIC, a Canadian entity,
X PRODUCTIONS, a Canadian entity,
RUSSELL ZOHOOR, an individual, and
HOOMAN ZOHOOR, an individual,

Defendants.

COMPLAINT AND JURY DEMAND

Plaintiff David Allison, doing business as Cheat Code Central, a sole proprietorship, for his Complaint against Defendants Jupiter Electric, x productions, Russell Zohoor and Hooman Zohoor, states as follows:

NATURE OF THE CASE

1. This is an action for copyright infringement brought under the Copyright Laws of the United States, 17 U.S.C. § 101 *et seq.*, unfair competition and passing off brought under the Lanham Act, 15 U.S.C. § 1051 *et seq.*, and state and common law unfair competition.

2. Plaintiff David Allison, doing business as Cheat Code Central, a sole proprietorship (“David Allison”), brings this action because Defendants, individually and in association with each other and/or third parties, willfully infringed David Allison’s copyrights by

copying, reproducing, and distributing David Allison's copyrighted works without authorization and willfully engaged in unfair competition by passing off David Allison's copyrighted works as if they were Defendants' works.

JURISDICTION AND VENUE

3. Jurisdiction is predicated upon 28 U.S.C. §§ 1331, 1338(a) and (b), and 1367(a). As the plaintiff is a citizen of a State and the defendants are, on information and belief, citizens or subjects of a foreign state, and as the matters in controversy exceed the sum or value of seventy-five thousand dollars (\$75,000.00), exclusive of interest and costs, this court also has jurisdiction over the state-law claims herein under 28 U.S.C. § 1332.

4. David Allison's claims arise in whole or in part in this District; Defendants operate and/or transact business in this District, and the Defendants have aimed their tortious conduct in whole or in part at this District. Accordingly, venue is proper under 28 U.S.C. §§ 1391(b) and (c), and 1400(a).

PARTIES

5. David Allison is a sole proprietorship with its principal place of business located in Broomfield, Colorado, and operates a website located at www.cheatcc.com. David Allison owns the exclusive copyrights to each of the web pages posted at www.cheatcc.com, as fully set forth below.

6. On information and belief, Defendant Jupiter Electric ("Jupiter") is an entity organized under and/or subject to the laws of Canada, with its principal place of business in Markham, Ontario, Canada. Jupiter is a direct competitor of David Allison.

7. On information and belief, Defendant x productions is an entity organized under and/or subject to the laws of Canada, with its principal place of business in Toronto, Ontario, Canada. x productions is a direct competitor of David Allison.

8. On information and belief, Defendant Russell Zohoor is the president of Defendant x productions; and/or is an individual who directly participated in and/or directed the acts described below.

9. On information and belief, Defendant Hooman Zohoor is an employee and/or officer of Defendant Jupiter; and/or is an individual who directly participated in and/or directed the acts described below.

FACTS

Plaintiff's Ownership of Copyrights Covering Web Pages

10. David Allison operates a premier website relating to video game cheat codes, located at www.cheatcc.com. "Cheat codes" allow video game players to access hidden video game features and are not typically included as part of the instruction manuals that accompany video game purchases. Rather, they must be discovered through either experimentation or receipt of direct information from the video game programmers. There is a long tradition of video game programmers and manufacturers incorporating these hidden cheat codes in their video games. As a result, a market has developed for information describing these hidden cheat codes for video game users.

11. David Allison began writing about video game cheat codes as early as May 1997, and in 1999/2000, he wrote and published a book on video game cheat codes, entitled *The Ultimate Code Book*.

12. David Allison also owns and operates a web site located at www.cheatcc.com, where he writes, compiles, arranges, and posts information and commentary on cheat codes for thousands of video games across numerous video game platforms. David Allison wrote the text contained on each cheat code web page located at www.cheatcc.com, and the text, compilation, and arrangement of the cheat code information on those pages was solely created by David Allison.

13. David Allison has built up a reputation for presenting quality cheat code guides through the published books and web site postings he has written. As part of his work, David Allison built relationships with video game developers, which allowed him to obtain and write about the latest and most interesting cheat codes.

14. Cheat code information is a highly desired item among video game users.

15. David Allison began to post web pages containing his commentary on PlayStation 2 video game codes on the www.cheatcc.com web site around March 2000 and on X-Box video game codes around November 2001. Since that time, Mr. Allison has continually updated the www.cheatcc.com website by posting new web pages about additional games and/or updating and revising the previously up loaded web pages. David Allison is the sole author of all video game cheat code commentary published on the www.cheatcc.com website.

16. David Allison's book, *The Ultimate Code Book*, and the content of the www.cheatcc.com web site, ("the Copyrighted Web Pages"), have been registered with the United States Copyright Office as follows:

Name of Work	Copyright Registration No.	Registration Date
The Ultimate Code Book	TX-5-116-527	January 5, 2000
Cheatcc.com web site	TX-6-162-180	May 12, 2005

(A true and correct copy of the copyright registration certificate for the Copyrighted Web Pages is attached as **Exhibit A.**)

17. David Allison created the Copyrighted Web Pages listed above and fixed them in a tangible form, with the exception of any third party banner ads contained on the pages. The Copyrighted Web Pages are David Allison's original works of authorship and constitute copyrightable subject matter under the copyright laws of the United States.

18. David Allison's Copyrighted Web Pages were published on the www.cheatcc.com web site, where they can be viewed and/or downloaded by any person. The www.cheatcc.com web site contains a copyright notice indicating that the content is owned by Cheat Code Central, the name of David Allison's sole proprietorship.

19. The quality and breadth of the video game cheat code commentary posted on the www.cheatcc.com drives a significant volume of traffic to the website, which in turn, generates advertising revenue. In the past, the www.cheatcc.com web site has received between six and seven million unique visitors per month.

Defendants' Wrongful Acts

20. Beginning as early as 1999, Defendants have operated and continue to operate multiple websites devoted to video game cheat codes at numerous web addresses, including www.cheatindex.com, allps2.net, xbox.cheatindex.com, snes.cheatindex.com, and

www.allcodes.com (collectively the “Cheatindex Websites”), that directly compete with David Allison’s www.cheatcc.com website.

21. The substantive content, including the text and the selection, coordination and arrangement of materials, on most if not all of the pages of the Cheatindex Websites dealing with video game cheat codes (“Cheatindex Infringing Web Pages”) are identical to pages from David Allison’s Copyrighted Web Pages, with the sole exception that banner ads contained on the respective pages are different.

22. On information or belief, Defendants copied David Allison’s Copyrighted Web Pages and reproduced those pages in their entirety (with the exception of banner ads) on one or more of the Cheatindex Websites, where they are currently on public display.

23. Defendants displayed and distributed copies of the Cheatindex Infringing Web Pages without conspicuously and appropriately publishing on each copy an appropriate copyright notice crediting David Allison and/or Cheat Code Central as the original author of the work.

24. Defendants are not now, nor have they ever been, authorized or licensed to copy, reproduce, modify, distribute, or display any of David Allison’s Copyrighted Web Pages. Nor has David Allison authorized Defendants to engage in the activities about which he now complains.

25. Defendants falsely represented to customers, potential customers, and/or others, directly and/or indirectly, that the Cheatindex Infringing Web Pages they posted on the Cheatindex Websites originated from Defendants.

26. Defendants had actual knowledge of David Allison’s copyrights and copyright notices. Despite this knowledge, Defendants willfully copied, reproduced, modified, displayed

and/or distributed unauthorized (and therefore infringing) copies of some of David Allison's Copyrighted Web Pages, and passed off David Allison's Copyrighted Web Pages as Defendants' own.

27. Defendants copied, reproduced, modified, displayed, and/or distributed the Cheatindex Infringing Web Pages for the purposes of commercial advantage and/or private financial gain.

Injury to David Allison

28. David Allison is informed and believes, and on that basis alleges, that unless enjoined by this Court, Defendants intend to continue their course of wrongful conduct and to continue to copy, reproduce, modify, distribute, display, use, infringe upon, and/or otherwise profit from David Allison's Copyrighted Web Pages and the Cheatindex Infringing Web Pages directly copied from David Allison's Copyrighted Web Pages. As a direct and proximate result of Defendants' wrongful acts, David Allison has already suffered irreparable injury and monetary damages in an undetermined amount.

29. David Allison is informed and believes that, since Defendants directly copied David Allison's Copyrighted Web Pages and posted them as their own on the Cheatindex Websites, traffic to David Allison's www.cheatcc.com website has gone down, while traffic to the Cheatindex Websites has increased.

30. David Allison has no adequate remedy at law to redress all of the injuries that Defendants have caused and are likely to continue to cause by their conduct. David Allison will continue to suffer irreparable injury and monetary damage until Defendants' wrongful actions are enjoined by this Court.

COUNT I
Copyright Infringement
17 U.S.C. §§ 101 et seq.

31. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

32. David Allison's Copyrighted Web Pages were automatically subject to copyright protection under 17 U.S.C. § 102(a) when David Allison fixed such works in a tangible medium of expression. David Allison received Copyright Registration TX-5-116-527 for his book entitled *The Ultimate Code Book*, which registration has an effective date of January, 5, 2000. David Allison received Copyright Registration TX-6-162-180 for the "Cheatcc.com web site," which registration has an effective date of May 12, 2005. These copyright registrations fulfill the jurisdictional requirements of 17 U.S.C. § 411(a) to bring a copyright action regarding the Copyrighted Web Pages.

33. Certificates of Copyright Registration constitute prima facie evidence of the validity of the copyrights and of the facts stated in the certificates. 17 U.S.C. § 410(c). David Allison's registered copyrights are entitled to such statutory presumption of validity.

34. By the actions alleged above, Defendants have infringed and are continuing to infringe David Allison's copyrights in and relating to the Copyrighted Web Pages by copying, reproducing, modifying, displaying and/or distributing, without David Allison's authorization, web pages which contain direct, verbatim copies of David Allison's Copyrighted Web Pages in violation of 17 U.S.C. §§ 106 and 501.

35. Upon information and belief, after a reasonable opportunity for further investigation or discovery, there is likely to be evidentiary support that Defendants' conduct was and is willfully done with knowledge of David Allison's copyrights.

36. David Allison has no adequate remedy at law. Defendants' conduct has caused, and, if not enjoined will continue to cause, irreparable harm to David Allison. As a result of Defendants' wrongful conduct, David Allison is entitled to injunctive relief, actual damages, and Defendants' profits.

COUNT II
Passing Off and Federal Unfair Competition
15 U.S.C. § 1051 et seq.

37. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

38. The aforesaid acts of Defendants are likely to cause confusion, mistake, or deception as to the origin, sponsorship, or approval of Defendants' goods, and also misrepresent the nature, characteristics, and qualities of Defendants' goods. Defendants' actions constitute false designations of origin, unfair competition, false advertising, and passing off in violation of Section 43(a) of the Trademark Act of 1946, as amended, 15 U.S.C. § 1125(a). Such actions were and are willful and deliberate.

39. David Allison has no adequate remedy at law. Defendants' conduct has caused, and, if not enjoined will continue to cause, irreparable harm to David Allison. As a result of Defendants' wrongful conduct, David Allison is entitled to injunctive relief, actual damages, Defendant's profits, exemplary damages, attorney's fees, and costs.

COUNT III
Common Law Unfair Competition

40. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

41. The aforesaid acts of Defendants constitute common law unfair competition in Colorado and other states where Defendants offer and/or advertise their goods, including this District, and violate of the common law of Colorado and laws of other states, by reason of which David Allison has suffered, and will continue to suffer, irreparable injury and monetary damages in an undetermined amount. Such actions were and are willful and deliberate.

42. As a result of Defendants' wrongful conduct, David Allison is entitled to injunctive relief, actual damages, Defendants' profits, exemplary damages, attorney's fees, and costs.

COUNT IV
Deceptive Trade Practices – Colorado Consumer
Protection Act

43. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

44. The aforesaid acts of Defendants constitute deceptive trade practices under the Colorado Consumer Protection Act, Colo. Rev. Stat. §§ 6-1-105(1). Such acts were undertaken willfully, wantonly and in bad faith.

45. David Allison has been injured by Defendants' deceptive trade practices in the course of his business. Defendants' deceptive trade practices have had and are continuing to have a significant impact on the consuming public that seeks cheat code information.

46. As a result of Defendants' deceptive trade practices, David Allison has been damaged. David Allison will continue to sustain irreparable injury and monetary damages from Defendants' deceptive trade practices unless and until Defendants are enjoined from continuing their unlawful conduct. David Allison is entitled to recover actual or statutory damages, Defendants' profits, exemplary damages, reasonable attorneys' fees, and costs in connection with this claim, as well as appropriate equitable relief.

PRAYER FOR RELIEF

WHEREFORE, David Allison prays that this Court enter judgment in his favor on each and every claim for relief set forth above, and award David Allison all appropriate relief, including but not limited to the following:

- A. Declare that Defendants have infringed David Allison's copyrights covering its Copyrighted Web Pages.
- B. Declare that Defendants have engaged in unfair competition and deceptive trade practices, and have violated Section 43(a) of the Lanham Act, as well as Colorado statutes and the common law.
- C. Order that, pursuant to 17 U.S.C. § 502 and/or 17 U.S.C. § 1203, Defendants and all of their employees, servants, agents, distributors, and persons in active concert or participation with them be preliminarily during the pendency of this action and permanently thereafter enjoined from copying, reproducing, modifying, displaying and/or distributing the Cheatindex Infringing Web Pages and/or the Copyrighted Web Pages, or otherwise infringing David Allison's copyrights.

- D. Order the impounding for destruction of all copies or reproductions of any products containing unauthorized reproductions of David Allison's Copyrighted Web Pages, including but not limited to the Cheatindex Infringing Web Pages.
- E. Order an accounting of Defendants' profits and award David Allison its actual damages and Defendants' profits not taken into account in calculating actual damages, including increased damages for willful violations of David Allison's rights.
- F. Award David Allison monetary relief in an amount to be fixed by the Court in its discretion as just, including:
 - (a) All profits received by Defendant from sales and revenues of any kind made as a result of its infringing or otherwise wrongful actions;
 - (b) All damages sustained by David Allison as a result of Defendant's acts, and that such damages be trebled pursuant to 15 U.S.C. § 1117 and/or 18 U.S.C. § 1964(c), and Colo. Rev. Stat. § 6-1-113; and
 - (c) Exemplary damages in view of the intentional, malicious, and bad faith nature of Defendant's actions.
- G. Award David Allison prejudgment and post-judgment interest, and David Allison's costs and attorney's fees.
- H. Award David Allison such other and further relief as this Court deems just and appropriate.

JURY DEMAND

Plaintiff David Allison, doing business as Cheat Code Central, demands a trial by jury on all issues so triable.

Respectfully submitted this 20th day of January, 2006

s/ J. Owen Borum

Mark W. Fischer

J. Owen Borum

FAEGRE & BENSON LLP

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Boulder, Colorado 80302

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Facsimile: (303) 447-7800

E-mail: mfischer@faegre.com

oborum@faegre.com

Attorneys for Plaintiff David Allison d/b/a
Cheat Code Central

Plaintiff's Address:

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4560 Augusta Drive
Broomfield, Colorado 80020

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS
DAVID ALLISON, doing business as CHEAT CODE CENTRAL, a sole proprietorship
(b) County of Residence of First Listed Plaintiff Broomfield
(c) Attorney's (Firm Name, Address, and Telephone Number) Mark W. Fischer, J. Owen Borum, FAEGRE & BENSON LLP, 1900 Fifteenth Street, Boulder, Colorado 80302, (303) 447-7700

DEFENDANTS
JUPITER ELECTRIC, a Canadian entity, X PRODUCTIONS, a Canadian entity, RUSSELL ZOHOOR, an individual, and HOOMAN ZOHOOR, an individual
County of Residence of First Listed Defendant Markham Ontario Canada
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.
Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
PTF DEF
Citizen of This State 1 1 Incorporated or Principal Place of Business In This State
Citizen of Another State 2 2 Incorporated and Principal Place of Business In Another State
Citizen or Subject of a Foreign Country 3 3 Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, SOCIAL SECURITY, FEDERAL TAX SUITS, BANKRUPTCY, OTHER STATUTES. Contains various legal categories and checkboxes.

V. ORIGIN (Place an "X" in One Box Only)
1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from another district (specify)
6 Multidistrict Litigation
7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): Copyright Act (17U.S.C. Section 101, et. seq.) and Lanham Act (15 U.S.S. Section 1051, et. seq.)
Brief description of cause: Copyright Infringement, Unfair Competition and Passing Off

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23
DEMAND \$ 75,000 +
CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

DATE 1/20/06 SIGNATURE OF ATTORNEY OF RECORD s/J. Owen Borum

FOR OFFICE USE ONLY
RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form TX
 For a Nondramatic Literary Work

REGI TX 6-162-180

TX0006162180

EFFECTIVE DATE OF REGISTRATION

MAY 12 2005
 Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK
 Cheatcc.com website

PREVIOUS OR ALTERNATIVE TITLES

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

If published in a periodical or serial give. Volume Number Issue Date On Pages

2

a NAME OF AUTHOR David Allison DATES OF BIRTH AND DEATH Year Born 1980 Year Died

Was this contribution to the work a "work made for hire"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE Name of Country USA OR Citizen of Donorced in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Yes No Pseudonymous? Yes No

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions) For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. Revised text & compilation of website, excluding any third party banner ads

b NAME OF AUTHOR DATES OF BIRTH AND DEATH Year Born Year Died

Was this contribution to the work a "work made for hire"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of Donorced in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Yes No Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

c NAME OF AUTHOR DATES OF BIRTH AND DEATH Year Born Year Died

Was this contribution to the work a "work made for hire"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of Donorced in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Yes No Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

3

a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED 2005 This information must be given in all cases.

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK Month May Day 4 Year 2005 Complete this information ONLY if this work has been published.

4

See instructions before completing this space

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2
 David Allison
 4560 Augusta Drive
 Broomfield, CO 80020

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

APPLICATION RECEIVED 5/12/05 6/7/05

ONE DEPOSIT RECEIVED 5/12/05 6/7/05

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

DO NOT WRITE HERE OFFICE USE ONLY

MORE ON BACK Complete all applicable spaces (numbers 5-8) on the reverse side of this page. See detailed instructions. Sign the form at the B.

DO NOT WRITE HERE Page 1 of 4 pages

EXHIBIT A

EXAMINED BY MB FORM TX
CHECKED BY

CORRESPONDENCE
Yes FOR COPYRIGHT OFFICE USE ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼

a. This is the first published edition of a work previously registered in unpublished form.

b. This is the first application submitted by this author as copyright claimant

c. This is a changed version of the work, as shown by space 6 on this application

If your answer is "Yes," give Previous Registration Number ▶

Year of Registration ▶

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

Previously published version of website; website incorporates some material from prior registration TX-5-116-527, The Ultimate Code Book, by David Allison; third-party banner advertisements

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

Revised text & compilation of website, specifically, the addition of new website pages for Haunting Ground (PlayStation 2); Star Wars: Episode 3 - Revenge Of The Sith (PlayStation 2 & Xbox); Grand Theft Auto: San Andreas (PlayStation 2); MX vs. ATV Unleashed (PlayStation 2 & Xbox); Lego Star Wars (PlayStation 2, Xbox, PC); Splinter Cell: Chaos Theory (PlayStation 2, Xbox, PC, GameCube); Megaman X8 (PlayStation 2); Dynasty Warriors 5 (PlayStation 2); (Con't)

a 6

See instructions before completing this space.

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account. Name ▼ Account Number ▼

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

Elizabeth McGoogan Magnuson, Faegre & Benson
1900 Fifteenth Street
Boulder, CO 80302-5414

Area code and daytime telephone number ▶ 303-447-7700

Fax number ▶ 303-447-7800

Email ▶ bmagnuson@faegre.com

CERTIFICATION* I, the undersigned, hereby certify that I am the

Check only one ▶

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of David Allison

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Elizabeth McGoogan Magnuson

Date ▶ 06/08/2005

Handwritten signature (X) ▼

X Elizabeth M'Googan Magnuson

8

Certificate will be mailed in window envelope to this address:

Name ▼ Elizabeth McGoogan Magnuson, c/o Faegre & Benson
Number/Street/Apt ▼ 1900 Fifteenth Street
City/State/ZIP ▼ Boulder, CO 80302-5414

YOU MUST:
• Complete all necessary spaces
• Sign your application in space 6
SEND ALL ELEMENTS IN THE SAME PACKAGE.
1. Application form
2. Non-refundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material
MAIL TO:
Library of Congress
Copyright Office - TX
101 Independence Avenue, S.E.
Washington, D.C. 20540-6222

9
Fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov, visit the Copyright Office, or call (202) 707-5900

*17 U.S.C. § 506(e) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

CONTINUATION SHEET FOR APPLICATION FORMS



TX 6-162-180



PA | PAU | SE | SEG | SEU | SR | SRV | TX | TXU | VA | VAU

EFFECTIVE DATE OF REGISTRATION

MAY 12 2008
(Month) (Day) (Year)

CONTINUATION SHEET RECEIVED

Page 3 of 4 pages

- This Continuation Sheet is used in conjunction with Forms CA, PA, SE, SR, TX, and VA, only. Indicate which basic form you are continuing in the space in the upper right-hand corner
- If at all possible, try to fit the information called for into the spaces provided on the basic form.
- If you do not have enough space for all the information you need to give on the basic form, use this Continuation Sheet and submit it with the basic form
- If you submit this Continuation Sheet, clip (do not tape or staple) it to the basic form and fold the two together before submitting them
- Space A of this sheet is intended to identify the basic application. Space B is a continuation of Space 2 on the basic application. Space B is not applicable to Short Forms. Space C (on the reverse side of this sheet) is for the continuation of Spaces 1, 4, or 6 on the basic application or for the continuation of Space 1 on any of the three Short Forms PA, TX, or VA.

DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

IDENTIFICATION OF CONTINUATION SHEET: This sheet is a continuation of the application for copyright registration on the basic form submitted for the following work.

- TITLE. (Give the title as given under the heading "Title of this Work" in Space 1 of the basic form.)

A
Identification of Application

Cheatcc.com website

- NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S): (Give the name and address of at least one copyright claimant as given in Space 4 of the basic form or Space 2 of any of the Short Forms PA, TX, or VA.)

David Allison, 4560 Augusta Drive, Broomfield, CO 80020

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

B
Continuation of Space 2

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ► _____
Domiciled in ► _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No
If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

e

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ► _____
Domiciled in ► _____

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NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

f

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 No

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OR { Citizen of ► _____
Domiciled in ► _____

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CONTINUATION SHEET FOR APPLICATION FORMS



TX 6-162-180



PA | PAU | SE | SEG | SEU | SR | SRU | TX | TXU | VA | VAU

EFFECTIVE DATE OF REGISTRATION

MAY 12 2008
(Month) (Day) (Year)

CONTINUATION SHEET RECEIVED

Page 3 of 4 pages

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- Space A of this sheet is intended to identify the basic application. Space B is a continuation of Space 2 on the basic application. Space B is not applicable to Short Forms. Space C (on the reverse side of this sheet) is for the continuation of Spaces 1, 4, or 6 on the basic application or for the continuation of Space 1 on any of the three Short Forms PA, TX, or VA.

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A
Identification
of
Application

Cheatcc.com website

- NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S): (Give the name and address of at least one copyright claimant as given in Space 4 of the basic form or Space 2 of any of the Short Forms PA, TX, or VA.)

David Allison, 4560 Augusta Drive, Broomfield, CO 80020

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

B
Continuation
of Space 2

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 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ► _____
Domiciled in ► _____

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NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

e

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OR { Citizen of ► _____
Domiciled in ► _____

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Anonymous? Yes No
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If the answer to either of these questions is "Yes," see detailed instructions

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NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

f

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 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ► _____
Domiciled in ► _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
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If the answer to either of these questions is "Yes," see detailed instructions

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nFri Jan 20 15:23:07 2006

UNITED STATES DISTRICT COURT

DENVER, CO

Receipt No. 100 265579
Cashier stacie

C.C. Number: SEE CC REC 03/06

DO Code Div No
4613 1

Sub Acct	Type	Tender	Amount
1:510000	N	4	190.00
2:006900	N	4	60.00
Total Amount			\$ 250.00

FROM FAEGRE & BENSON

06-CV-98, ALLISON V JUPITER ELECTRIC ET
AL, SB

06 - CV - ⁵⁸⁸⁹⁸~~00098~~
EUN - DRS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.: 07-cv-00373-RPM-CBS

DAVID ALLISON, doing business as **CHEAT CODE
CENTRAL**, a sole proprietorship,

Plaintiff,

v.

THOMAS CARROLL,

Defendant.

FIRST AMENDED COMPLAINT AND JURY DEMAND

Plaintiff David Allison, doing business as Cheat Code Central, a sole proprietorship, for his First Amended Complaint against Defendant Thomas Carroll, states as follows:

NATURE OF THE CASE

1. This is an action for copyright infringement brought under the Copyright Laws of the United States, 17 U.S.C. § 101 *et seq.*, unfair competition and passing off brought under the Lanham Act, 15 U.S.C. § 1051 *et seq.*, and state and common law unfair competition.

2. Plaintiff David Allison, doing business as Cheat Code Central, a sole proprietorship (“David Allison”), brings this action because Defendant, individually and in association with third parties, willfully infringed David Allison’s copyrights by copying, reproducing, and distributing David Allison’s copyrighted works without authorization and willfully engaged in unfair competition by passing off David Allison’s copyrighted works as if they were Defendant’s works.

JURISDICTION AND VENUE

3. Jurisdiction is predicated upon 28 U.S.C. §§ 1331, 1338(a) and (b), and 1367(a). As the parties are citizens of different states and as the matters in controversy exceed the sum or value of seventy-five thousand dollars (\$75,000.00), exclusive of interest and costs, this court also has jurisdiction over the state-law claims herein under 28 U.S.C. § 1332.

4. David Allison’s claims arise in whole or in part in this District; Defendant operates and/or transacts business in this District, and Defendant has aimed its tortious conduct in whole or in part at this District. Accordingly, venue is proper under 28 U.S.C. §§ 1391(b) and (c), and 1400(a).

PARTIES

5. David Allison is a sole proprietorship with its principal place of business located in Broomfield, Colorado, and operates a website located at *www.cheatcc.com*. David Allison owns the exclusive copyrights to each of the web pages posted at *www.cheatcc.com*, as fully set forth below.

6. Defendant Thomas Carroll (“Carroll”) is a resident of Wilmette, Illinois, and is an individual who, upon information and belief, owns and operates *www.ps3cheats.com*. Defendant Carroll has directly participated in and/or directed the acts described below.

GENERAL ALLEGATIONS

Plaintiff’s Ownership of Copyrights Covering Web Pages

7. David Allison operates a premier website providing video game “cheat” codes, located at *www.cheatcc.com*. These “cheat” codes allow video game players to access hidden video game features, and are not typically included as part of the instruction manuals that

accompany video game purchases. Rather, they must be discovered through either experimentation or receipt of direct information from the video game programmers. There is a long tradition of video game programmers and manufacturers incorporating these hidden cheat codes in their video games. As a result, a market has developed for information describing these hidden cheat codes for video game users.

8. David Allison began writing about video game cheat codes as early as May 1997, and in 1999/2000, he wrote and published a book on video game cheat codes, entitled *The Ultimate Code Book*.

9. David Allison also owns and operates a web site located at *www.cheatcc.com*, where he writes, compiles, arranges, and posts information and commentary on cheat codes for thousands of video games across the most popular platforms in the gaming industry. David Allison wrote the text contained on each cheat code web page located at *www.cheatcc.com*, and solely created the compilation and arrangement of the cheat code information on each of those pages.

10. David Allison has built up a reputation for presenting quality cheat code guides through the published books and web site postings he has written. As part of his work, David Allison built relationships with video game developers, which allowed him to obtain and write about the latest and most interesting cheat codes. This information is a highly desired item among video game users.

11. David Allison began to post web pages containing his commentary on video game codes on the *www.cheatcc.com* web site October 1998. Since that time, David Allison has continually updated the *www.cheatcc.com* website by posting new web pages about additional

games and/or updating and revising the previously up loaded web pages. David Allison is the sole author of all video game cheat code commentary published on the *www.cheatcc.com* website.

12. David Allison's book, *The Ultimate Code Book*, and the content of the *www.cheatcc.com* web site, ("the Copyrighted Web Pages"), have been registered with the United States Copyright Office as follows:

Name of Work	Copyright Registration No.	Registration Date
The Ultimate Code Book	TX-5-116-527	January 5, 2000
Cheatcc.com web site	TX-6-162-180	May 12, 2005

(A true and correct copy of the copyright registration certificate for the Copyrighted Web Pages is attached as **Exhibit A.**)

13. David Allison created the Copyrighted Web Pages listed above and fixed them in a tangible medium, with the exception of any third party banner ads contained on the pages. The Copyrighted Web Pages are David Allison's original works of authorship and constitute copyrightable subject matter under the copyright laws of the United States.

14. David Allison's Copyrighted Web Pages have been published on the *www.cheatcc.com* web site, where they can be viewed and/or downloaded by any person. The *www.cheatcc.com* web site contains a copyright notice indicating that the content is owned by Cheat Code Central, the name of David Allison's sole proprietorship.

15. The quality and breadth of the video game cheat code commentary posted on the *www.cheatcc.com* drives a significant volume of traffic to the website, which in turn, generates

advertising revenue. In the past, the *www.cheatcc.com* web site has received between six and seven million unique visitors per month.

Defendant's Wrongful Acts

16. Upon information and belief, Carroll owns and operates the *www.Ps3cheats.com* website. The *www.Ps3cheats.com* website is devoted to providing video game cheat codes for popular gaming platforms, including PlayStation 2, PlayStation 3, Sony PSP, XBox, XBox 360, Gameboy Advance, Nintendo DS, Nintendo Wii, Gamecube, PC, Playstation, Dreamcast, Nintendo 64, DVD and Gameboy platforms, that directly compete with David Allison's *www.cheatcc.com* website.

17. The text on the *www.Ps3cheats.com* web pages providing the cheat codes for the platforms listed above ("*www.Ps3cheats.com* Web Pages") are identical to pages from David Allison's Copyrighted Web Pages, with the sole exception that banner ads contained on the respective pages are different.

18. On information or belief, Carroll copied David Allison's Copyrighted Web Pages and reproduced those pages in their entirety (with the exception of banner ads) on one or more of the *www.Ps3cheats.com* Web Pages, where they are currently on public display.

19. Carroll displayed and distributed copies of the *www.Ps3cheats.com* Web Pages without appropriately publishing on each copy an appropriate copyright notice crediting David Allison and/or Cheat Code Central as the original author of the work.

20. Carroll is not now, nor has ever been, authorized or licensed to copy, reproduce, modify, distribute, or display any of David Allison's Copyrighted Web Pages. Nor has David Allison authorized Carroll to engage in the activities about which he now complains.

21. Carroll falsely represented to customers, potential customers, and/or others, directly and/or indirectly, that the text on the *www.Ps3cheats.com* Web Pages posted on one or more of the *www.Ps3cheats.com* websites originated from Carroll.

22. Carroll had actual knowledge of David Allison's copyrights and copyright notices. Despite this knowledge, Carroll willfully copied, reproduced, modified, displayed and/or distributed unauthorized (and therefore infringing) copies of David Allison's Copyrighted Web Pages, and passed off David Allison's Copyrighted Web Pages as Carroll's own.

23. Carroll copied, reproduced, modified, displayed, and/or distributed the *www.Ps3cheats.com* Web Pages for the purposes of commercial advantage and/or private financial gain.

Injury to David Allison

24. David Allison is informed and believes, and on that basis alleges, that unless enjoined by this Court, Carroll intends to continue his course of wrongful conduct and to continue to copy, reproduce, modify, distribute, display, use, infringe upon, and/or otherwise profit from David Allison's Copyrighted Web Pages and the *www.Ps3cheats.com* Web Pages directly copied from David Allison's Copyrighted Web Pages. As a direct and proximate result of Carroll's wrongful acts, David Allison has already suffered irreparable injury and monetary damages in an undetermined amount.

25. David Allison is informed and believes that, since Carroll directly copied David Allison's Copyrighted Web Pages and posted them as his own on one or more of the *www.Ps3cheats.com* Web Pages, traffic to David Allison's *www.cheatcc.com* website has gone down, while traffic to Carroll's *www.Ps3cheats.com* website has increased.

26. David Allison has no adequate remedy at law to redress all of the injuries that Carroll has caused and are likely to continue to cause by his conduct. David Allison will continue to suffer irreparable injury and monetary damage until Carroll's wrongful actions are enjoined by this Court.

FIRST CLAIM FOR RELIEF

Copyright Infringement – 17 U.S.C. §§ 101 *et seq.*

27. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

28. David Allison's Copyrighted Web Pages were automatically subject to copyright protection under 17 U.S.C. § 102(a) when David Allison fixed such works in a tangible medium of expression. David Allison received Copyright Registration TX-5-116-527 for his book entitled *The Ultimate Code Book*, which registration has an effective date of January, 5, 2000. David Allison received Copyright Registration TX-6-162-180 for the "Cheatcc.com web site," which registration has an effective date of May 12, 2005. These copyright registrations fulfill the jurisdictional requirements of 17 U.S.C. § 411(a) to bring a copyright action regarding the Copyrighted Web Pages.

29. Certificates of Copyright Registration constitute prima facie evidence of the validity of the copyrights and of the facts stated in the certificates, under 17 U.S.C. § 410(c). David Allison's registered copyrights are entitled to a statutory presumption of validity.

30. By the actions alleged above, Carroll has infringed and is continuing to infringe David Allison's copyrights in and relating to the Copyrighted Web Pages by copying, reproducing, modifying, displaying and/or distributing, without David Allison's authorization,

web pages which contain direct, verbatim copies of David Allison's Copyrighted Web Pages in violation of 17 U.S.C. §§ 106 and 501.

31. Upon information and belief, after a reasonable opportunity for further investigation or discovery, there is likely to be evidentiary support that Carroll's conduct was and is willfully done with knowledge of David Allison's copyrights.

32. David Allison has no adequate remedy at law. Carroll's conduct has caused, and, if not enjoined will continue to cause, irreparable harm to David Allison. As a result of Carroll's wrongful conduct, David Allison is entitled to injunctive relief, actual damages, and Carroll's profits.

SECOND CLAIM FOR RELIEF

Passing Off and Federal Unfair Competition – 15 U.S.C. § 1051 *et seq.*

33. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

34. The aforesaid acts of Carroll are likely to cause confusion, mistake, or deception as to the origin, sponsorship, or approval of Carroll's goods, and also misrepresent the nature, characteristics, and qualities of Carroll's goods. Carroll's actions constitute false designations of origin, unfair competition, false advertising, and passing off in violation of Section 43(a) of the Trademark Act of 1946, as amended, 15 U.S.C. § 1125(a). Such actions were and are willful and deliberate.

35. David Allison has no adequate remedy at law. Carroll's conduct has caused, and, if not enjoined will continue to cause, irreparable harm to David Allison. As a result of Carroll's wrongful conduct, David Allison is entitled to injunctive relief, actual damages, Carroll's profits, exemplary damages, attorney's fees, and costs.

THIRD CLAIM FOR RELIEF

Common Law Unfair Competition

36. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

37. The aforesaid acts of Carroll constitute common law unfair competition in Colorado and other states where Carroll offers and/or advertises his goods, including this District, and violate of the common law of Colorado and laws of other states, by reason of which David Allison has suffered, and will continue to suffer, irreparable injury and monetary damages in an undetermined amount. Such actions were and are willful and deliberate.

38. As a result of Carroll's wrongful conduct, David Allison is entitled to injunctive relief, actual damages, Carroll's profits, exemplary damages, attorney's fees, and costs.

FOURTH CLAIM FOR RELIEF

Deceptive Trade Practices, Colorado Consumer Protection Act – Colo. Rev. Stat. § 6-1-105(1)

39. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

40. The aforesaid acts of Carroll constitute deceptive trade practices under the Colorado Consumer Protection Act, Colo. Rev. Stat. § 6-1-105(1). Such acts were undertaken willfully, wantonly and in bad faith.

41. David Allison has been injured by Carroll's deceptive trade practices taken in the course of his business. Carroll's deceptive trade practices have had and are continuing to have a significant impact on the consuming public that seeks cheat code information.

42. As a result of Carroll's deceptive trade practices, David Allison has been damaged. David Allison will continue to sustain irreparable injury and monetary damages from

Carroll's deceptive trade practices unless and until Carroll is enjoined from continuing their unlawful conduct. David Allison is entitled to recover actual or statutory damages, Carroll's profits, exemplary damages, reasonable attorneys' fees, and costs in connection with this claim, as well as appropriate equitable relief.

FIFTH CLAIM FOR RELIEF

Violation of the Illinois Uniform Fraud and Deceptive Business Practices Act
815 ILCS 510/1 et seq.

43. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

44. Carroll's conduct, and the conduct of his representatives, creates a likelihood of misunderstanding and therefore violates the Illinois Uniform Deceptive Trade Practices Act.

SIXTH CLAIM FOR RELIEF

Illinois State Unfair Competition

45. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

46. Carroll's conduct, and the conduct of his representatives, violates Illinois unfair competition law.

PRAYER FOR RELIEF

WHEREFORE, David Allison prays that this Court enter judgment in his favor on each and every claim for relief set forth above, and award David Allison all appropriate relief, including but not limited to the following:

- A. Declare that Defendant has infringed David Allison's copyrights covering his Copyrighted Web Pages.

- B. Declare that Defendant has engaged in unfair competition and deceptive trade practices, and has violated Section 43(a) of the Lanham Act, as well as Colorado and Illinois statutes and the common law.
- C. Order that, pursuant to 17 U.S.C. § 502 and/or 17 U.S.C. § 1203, Defendant and all of his employees, servants, agents, distributors, and persons in active concert or participation with it be preliminarily during the pendency of this action and permanently thereafter enjoined from copying, reproducing, modifying, displaying and/or distributing the *www.Ps3cheats.com* Web Pages and/or the Copyrighted Web Pages, or otherwise infringing David Allison's copyrights.
- D. Order the impounding for destruction of all copies or reproductions of any products containing unauthorized reproductions of David Allison's Copyrighted Web Pages, including but not limited to the *www.Ps3cheats.com* Web Pages.
- E. Order an accounting of Defendant's profits and award David Allison its actual damages and Defendant's profits not taken into account in calculating actual damages, including increased damages for willful violations of David Allison's rights.
- F. Award David Allison monetary relief in an amount to be fixed by the Court in its discretion as just, including:
 - (a) All profits received by Defendant from sales and revenues of any kind made as a result of its infringing or otherwise wrongful actions;

- (b) All damages sustained by David Allison as a result of Defendant's acts, and that such damages be trebled pursuant to 15 U.S.C. § 1117 and/or 18 U.S.C. § 1964(c), and Colo. Rev. Stat. § 6-1-113; and
- (c) Exemplary damages in view of the intentional, malicious, and bad faith nature of Defendant's actions.
- G. Award David Allison prejudgment and post-judgment interest, and David Allison's costs and attorney's fees.
- H. Award David Allison such other relief as this Court deems just and appropriate.

JURY DEMAND

Plaintiff David Allison, doing business as Cheat Code Central, demands a trial by jury on all issues so triable.

Respectfully submitted this 8th day of March, 2007

s/ Jared B. Briant

Mark W. Fischer
Jared B. Briant
FAEGRE & BENSON LLP
1900 Fifteenth Street
Boulder, Colorado 80302
Tel. - (303) 447-7700
Fax - (303) 447-7800
E-mail – mfischer@faegre.com
 jbriant@faegre.com
Attorneys for Plaintiff DAVID ALLISON

Plaintiff's Address:
Cheat Code Central
4560 Augusta Drive
Broomfield, Colorado 80020

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form TX
For a Nondramatic Literary Work

REGI TX 6-162-180



EFFECTIVE DATE OF REGISTRATION
MAY 12 2005
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼

Cheatcc.com website

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give. Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2

NAME OF AUTHOR ▼

a David Allison

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼
1980

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR Citizen of ► USA
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymously? Yes No
Pseudonymously? Yes No

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of the work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

Revised text & compilation of website, excluding any third party banner ads

NAME OF AUTHOR ▼

b

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR Citizen of ►
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymously? Yes No
Pseudonymously? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

c

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR Citizen of ►
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymously? Yes No
Pseudonymously? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

2005

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Month ► MAY Day ► 4 Year ► 2005

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2 ▼

David Allison
4560 Augusta Drive
Broomfield, CO 80020

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED 5/12/05 6/7/05
ONE DEPOSIT RECEIVED 5/12/05 6/7/05
TWO DEPOSITS RECEIVED
FUNDS RECEIVED

MORE ON BACK ▶ • Complete all applicable spaces (numbers 5-8) on the reverse side of this page.
• See detailed instructions. • Sign the form at line 5.

DO NOT WRITE HERE
Page 1 of 4 pages

EXHIBIT A

EXAMINED BY <u>MB</u>	FORM TX
CHECKED BY	
<input checked="" type="checkbox"/> CORRESPONDENCE Yes	FOR COPYRIGHT OFFICE USE ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼

a This is the first published edition of a work previously registered in unpublished form.

b This is the first application submitted by this author as copyright claimant

c This is a changed version of the work, as shown by space 6 on this application

If your answer is "Yes," give Previous Registration Number ▶

Year of Registration ▶

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

Previously published version of website; website incorporates some material from prior registration TX-5-116-527, The Ultimate Code Book, by David Allison; third-party banner advertisements

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

Revised text & compilation of website, specifically, the addition of new website pages for Haunting Ground (PlayStation 2); Star Wars: Episode 3 - Revenge Of The Sith (PlayStation 2 & Xbox); Grand Theft Auto: San Andreas (PlayStation 2); MX vs. ATV Unleashed (PlayStation 2 & Xbox); Lego Star Wars (PlayStation 2, Xbox, PC); Splinter Cell: Chaos Theory (PlayStation 2, Xbox, PC, GameCube); Megaman X8 (PlayStation 2); Dynasty Warriors 5 (PlayStation 2); (Con't)

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account. Name ▼ Account Number ▼

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name / Address / Apt / City / State / ZIP ▼

Elizabeth McGoogan Magnuson, Faegre & Benson
1900 Fifteenth Street
Boulder, CO 80302-5414

Area code and daytime telephone number ▶ 303-447-7700

Fax number ▶ 303-447-7800

Email ▶ bmagnuson@faegre.com

CERTIFICATION I, the undersigned, hereby certify that I am the

- Check only one ▶
- author
 - other copyright claimant
 - owner of exclusive right(s)
 - authorized agent of David Allison

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Elizabeth McGoogan Magnuson

Date ▶ 06/08/2005

Handwritten signature (X) ▼

X Elizabeth M. Googan Magnuson

Certificate will be mailed in window envelope to this address:

Name ▼	Elizabeth McGoogan Magnuson, c/o Faegre & Benson
Number/Street/Apt ▼	1900 Fifteenth Street
City/State/ZIP ▼	Boulder, CO 80302-5414

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE

1. Application form
2. Non-refundable filing fee in check or money order payable to Registrar of Copyrights
3. Deposit material!

MAIL TO:
Library of Congress
Copyright Office - TX
101 Independence Avenue, S.E.
Washington, D.C. 20540-4222

9

*17 U.S.C. § 506(e) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

CONTINUATION SHEET FOR APPLICATION FORMS

Form TX / CON
UNITED STATES COPYRIGHT OFFICE

TX 6-162-180



PA | PAU | SE | SEG | SEU | SR | SRU | TX | TXU | VA | VAU

EFFECTIVE DATE OF REGISTRATION

MAY 12 2005
(Month) (Day) (Year)

CONTINUATION SHEET RECEIVED

Page 3 of 4 pages

- This Continuation Sheet is used in conjunction with Forms CA, PA, SE, SR, TX, and VA, only. Indicate which basic form you are continuing in the space in the upper right-hand corner.
- If at all possible, try to fit the information called for into the spaces provided on the basic form.
- If you do not have enough space for all the information you need to give on the basic form, use this Continuation Sheet and submit it with the basic form.
- If you submit this Continuation Sheet, clip (do not tape or staple) it to the basic form and fold the two together before submitting them.
- Space A of this sheet is intended to identify the basic application.
- Space B is a continuation of Space 2 on the basic application.
- Space B is not applicable to Short Forms.
- Space C (on the reverse side of this sheet) is for the continuation of Spaces 1, 4, or 6 on the basic application or for the continuation of Space 1 on any of the three Short Forms PA, TX, or VA.

DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

IDENTIFICATION OF CONTINUATION SHEET: This sheet is a continuation of the application for copyright registration on the basic form submitted for the following work.

- **TITLE.** (Give the title as given under the heading "Title of this Work" in Space 1 of the basic form.)

A

Identification of Application

Cheatcc.com website

- **NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S):** (Give the name and address of at least one copyright claimant as given in Space 4 of the basic form or Space 2 of any of the Short Forms PA, TX, or VA.)

David Allison, 4560 Augusta Drive, Broomfield, CO 80020

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

B

Continuation of Space 2

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ▶ _____
Domiciled in ▶ _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

e

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ▶ _____
Domiciled in ▶ _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

f

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ▶ _____
Domiciled in ▶ _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

Use the reverse side of this sheet if you need more space for continuation of Spaces 1, 4, or 6 of the basic form or for the continuation of Space 1 on any of the Short Forms PA, TX, or VA.

CONTINUATION SHEET FOR APPLICATION FORMS

Form TX / CON
UNITED STATES COPYRIGHT OFFICE

TX 6-162-180



PA | PAU | SE | SEG | SEU | SR | SRU | TX | TXU | VA | VAU

EFFECTIVE DATE OF REGISTRATION

MAY 12 2005
(Month) (Day) (Year)

CONTINUATION SHEET RECEIVED

Page 3 of 4 pages

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IDENTIFICATION OF CONTINUATION SHEET: This sheet is a continuation of the application for copyright registration on the basic form submitted for the following work.

- **TITLE.** (Give the title as given under the heading "Title of this Work" in Space 1 of the basic form.)

A

Identification of Application

Cheatcc.com website

- **NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S):** (Give the name and address of at least one copyright claimant as given in Space 4 of the basic form or Space 2 of any of the Short Forms PA, TX, or VA.)

David Allison, 4560 Augusta Drive, Broomfield, CO 80020

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

B

Continuation of Space 2

- Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR
Citizen of ▶ _____
Domiciled in ▶ _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

- Anonymous? Yes No
 - Pseudonymous? Yes No
- If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

e

- Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR
Citizen of ▶ _____
Domiciled in ▶ _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

- Anonymous? Yes No
 - Pseudonymous? Yes No
- If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

f

- Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR
Citizen of ▶ _____
Domiciled in ▶ _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

- Anonymous? Yes No
 - Pseudonymous? Yes No
- If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

Use the reverse side of this sheet if you need more space for continuation of Spaces 1, 4, or 6 of the basic form or for the continuation of Space 1 on any of the Short Forms PA, TX, or VA.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.: 07-cv-00373-RPM-CBS

DAVID ALLISON, doing business as **CHEAT CODE
CENTRAL**, a sole proprietorship,

Plaintiff,

v.

THOMAS CARROLL,

Defendant.

SECOND AMENDED COMPLAINT AND JURY DEMAND

Plaintiff David Allison, doing business as Cheat Code Central, a sole proprietorship, for his Second Amended Complaint against Defendant Thomas Carroll, states as follows:

NATURE OF THE CASE

1. This is an action for copyright infringement brought under the Copyright Laws of the United States, 17 U.S.C. § 101 *et seq.*, unfair competition and passing off brought under the Lanham Act, 15 U.S.C. § 1051 *et seq.*, and state and common law unfair competition.

2. Plaintiff David Allison, doing business as Cheat Code Central, a sole proprietorship (“David Allison”), brings this action because Defendant, individually and in association with third parties, willfully infringed David Allison’s copyrights by copying, reproducing, and distributing David Allison’s copyrighted works without authorization and willfully engaged in unfair competition by passing off David Allison’s copyrighted works as if they were Defendant’s works.

JURISDICTION AND VENUE

3. Jurisdiction is predicated upon 28 U.S.C. §§ 1331, 1338(a) and (b), and 1367(a). As the parties are citizens of different states and as the matters in controversy exceed the sum or value of seventy-five thousand dollars (\$75,000.00), exclusive of interest and costs, this court also has jurisdiction over the state-law claims herein under 28 U.S.C. § 1332.

4. David Allison’s claims arise in whole or in part in this District; Defendant operates and/or transacts business in this District, and Defendant has aimed its tortious conduct in whole or in part at this District. Accordingly, venue is proper under 28 U.S.C. §§ 1391(b) and (c), and 1400(a).

PARTIES

5. David Allison is a sole proprietorship with its principal place of business located in Broomfield, Colorado, and operates a website located at *www.cheatcc.com*. David Allison owns the exclusive copyrights to each of the web pages posted at *www.cheatcc.com*, as fully set forth below.

6. Defendant Thomas Carroll (“Carroll”) is a resident of Wilmette, Illinois, and is an individual who, upon information and belief, owns and operates *www.ps3cheats.com*. Defendant Carroll has directly participated in and/or directed the acts described below.

GENERAL ALLEGATIONS

Plaintiff’s Ownership of Copyrights Covering Web Pages

7. David Allison operates a premier website providing video game “cheat” codes, located at *www.cheatcc.com*. These “cheat” codes allow video game players to access hidden video game features, and are not typically included as part of the instruction manuals that

accompany video game purchases. Rather, they must be discovered through either experimentation or receipt of direct information from the video game programmers. There is a long tradition of video game programmers and manufacturers incorporating these hidden cheat codes in their video games. As a result, a market has developed for information describing these hidden cheat codes for video game users.

8. David Allison began writing about video game cheat codes as early as May 1997, and in 1999/2000, he wrote and published a book on video game cheat codes, entitled *The Ultimate Code Book*.

9. David Allison also owns and operates a web site located at *www.cheatcc.com*, where he writes, compiles, arranges, and posts information and commentary on cheat codes for thousands of video games across the most popular platforms in the gaming industry. David Allison wrote the text contained on each cheat code web page located at *www.cheatcc.com*, and solely created the compilation and arrangement of the cheat code information on each of those pages.

10. David Allison has built up a reputation for presenting quality cheat code guides through the published books and web site postings he has written. As part of his work, David Allison built relationships with video game developers, which allowed him to obtain and write about the latest and most interesting cheat codes. This information is a highly desired item among video game users.

11. David Allison began to post web pages containing his commentary on video game codes on the *www.cheatcc.com* web site October 1998. Since that time, David Allison has continually updated the *www.cheatcc.com* website by posting new web pages about additional

games and/or updating and revising the previously up loaded web pages. David Allison is the sole author of all video game cheat code commentary published on the *www.cheatcc.com* website.

12. David Allison's book, *The Ultimate Code Book*, and the content of the *www.cheatcc.com* web site, ("the Copyrighted Web Pages"), have been registered with the United States Copyright Office as follows:

Name of Work	Copyright Registration No.	Registration Date
The Ultimate Code Book	TX-5-116-527	January 5, 2000
Cheatcc.com web site	TX-6-162-180	May 12, 2005
Cheatcc.com web site	TX-6-516-407	January 29, 2007

(A true and correct copy of the copyright registration certificates for the Copyrighted Web Pages is attached as **Exhibit A.**)

13. David Allison created the Copyrighted Web Pages listed above and fixed them in a tangible medium, with the exception of any third party banner ads contained on the pages. The Copyrighted Web Pages are David Allison's original works of authorship and constitute copyrightable subject matter under the copyright laws of the United States.

14. David Allison's Copyrighted Web Pages have been published on the *www.cheatcc.com* web site, where they can be viewed and/or downloaded by any person. The *www.cheatcc.com* web site contains a copyright notice indicating that the content is owned by Cheat Code Central, the name of David Allison's sole proprietorship.

15. The quality and breadth of the video game cheat code commentary posted on the *www.cheatcc.com* drives a significant volume of traffic to the website, which in turn, generates advertising revenue. In the past, the *www.cheatcc.com* web site has received between six and seven million unique visitors per month.

Defendant's Wrongful Acts

16. Upon information and belief, Carroll owns and operates the *www.Ps3cheats.com* website. The *www.Ps3cheats.com* website is devoted to providing video game cheat codes for popular gaming platforms, including PlayStation 2, PlayStation 3, Sony PSP, XBox, XBox 360, Gameboy Advance, Nintendo DS, Nintendo Wii, Gamecube, PC, Playstation, Dreamcast, Nintendo 64, DVD and Gameboy platforms, that directly compete with David Allison's *www.cheatcc.com* website.

17. The text on the *www.Ps3cheats.com* web pages providing the cheat codes for the platforms listed above ("www.Ps3cheats.com Web Pages") are identical to pages from David Allison's Copyrighted Web Pages, with the sole exception that banner ads contained on the respective pages are different.

18. On information or belief, Carroll copied David Allison's Copyrighted Web Pages and reproduced those pages in their entirety (with the exception of banner ads) on one or more of the *www.Ps3cheats.com* Web Pages, where they are currently on public display.

19. Carroll displayed and distributed copies of the *www.Ps3cheats.com* Web Pages without appropriately publishing on each copy an appropriate copyright notice crediting David Allison and/or Cheat Code Central as the original author of the work.

20. Carroll is not now, nor has ever been, authorized or licensed to copy, reproduce, modify, distribute, or display any of David Allison's Copyrighted Web Pages. Nor has David Allison authorized Carroll to engage in the activities about which he now complains.

21. Carroll falsely represented to customers, potential customers, and/or others, directly and/or indirectly, that the text on the *www.Ps3cheats.com* Web Pages posted on one or more of the *www.Ps3cheats.com* websites originated from Carroll.

22. Carroll had actual knowledge of David Allison's copyrights and copyright notices. Despite this knowledge, Carroll willfully copied, reproduced, modified, displayed and/or distributed unauthorized (and therefore infringing) copies of David Allison's Copyrighted Web Pages, and passed off David Allison's Copyrighted Web Pages as Carroll's own.

23. Carroll copied, reproduced, modified, displayed, and/or distributed the *www.Ps3cheats.com* Web Pages for the purposes of commercial advantage and/or private financial gain.

Injury to David Allison

24. David Allison is informed and believes, and on that basis alleges, that unless enjoined by this Court, Carroll intends to continue his course of wrongful conduct and to continue to copy, reproduce, modify, distribute, display, use, infringe upon, and/or otherwise profit from David Allison's Copyrighted Web Pages and the *www.Ps3cheats.com* Web Pages directly copied from David Allison's Copyrighted Web Pages. As a direct and proximate result of Carroll's wrongful acts, David Allison has already suffered irreparable injury and monetary damages in an undetermined amount.

25. David Allison is informed and believes that, since Carroll directly copied David Allison's Copyrighted Web Pages and posted them as his own on one or more of the *www.Ps3cheats.com* Web Pages, traffic to David Allison's *www.cheatcc.com* website has gone down, while traffic to Carroll's *www.Ps3cheats.com* website has increased.

26. David Allison has no adequate remedy at law to redress all of the injuries that Carroll has caused and are likely to continue to cause by his conduct. David Allison will continue to suffer irreparable injury and monetary damage until Carroll's wrongful actions are enjoined by this Court.

FIRST CLAIM FOR RELIEF

Copyright Infringement – 17 U.S.C. §§ 101 *et seq.*

27. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

28. David Allison's Copyrighted Web Pages were automatically subject to copyright protection under 17 U.S.C. § 102(a) when David Allison fixed such works in a tangible medium of expression. David Allison received Copyright Registration TX-5-116-527 for his book entitled *The Ultimate Code Book*, which registration has an effective date of January, 5, 2000. David Allison received Copyright Registration TX-6-162-180 for the "Cheatcc.com web site," which registration has an effective date of May 12, 2005. These copyright registrations fulfill the jurisdictional requirements of 17 U.S.C. § 411(a) to bring a copyright action regarding the Copyrighted Web Pages.

29. Certificates of Copyright Registration constitute prima facie evidence of the validity of the copyrights and of the facts stated in the certificates, under 17 U.S.C. § 410(c). David Allison's registered copyrights are entitled to a statutory presumption of validity.

30. By the actions alleged above, Carroll has infringed and is continuing to infringe David Allison's copyrights in and relating to the Copyrighted Web Pages by copying, reproducing, modifying, displaying and/or distributing, without David Allison's authorization, web pages which contain direct, verbatim copies of David Allison's Copyrighted Web Pages in violation of 17 U.S.C. §§ 106 and 501.

31. Upon information and belief, after a reasonable opportunity for further investigation or discovery, there is likely to be evidentiary support that Carroll's conduct was and is willfully done with knowledge of David Allison's copyrights.

32. David Allison has no adequate remedy at law. Carroll's conduct has caused, and, if not enjoined will continue to cause, irreparable harm to David Allison. As a result of Carroll's wrongful conduct, David Allison is entitled to injunctive relief, actual damages, and Carroll's profits.

SECOND CLAIM FOR RELIEF

Passing Off and Federal Unfair Competition – 15 U.S.C. § 1051 *et seq.*

33. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

34. The aforesaid acts of Carroll are likely to cause confusion, mistake, or deception as to the origin, sponsorship, or approval of Carroll's goods, and also misrepresent the nature, characteristics, and qualities of Carroll's goods. Carroll's actions constitute false designations of origin, unfair competition, false advertising, and passing off in violation of Section 43(a) of the Trademark Act of 1946, as amended, 15 U.S.C. § 1125(a). Such actions were and are willful and deliberate.

35. David Allison has no adequate remedy at law. Carroll's conduct has caused, and, if not enjoined will continue to cause, irreparable harm to David Allison. As a result of Carroll's wrongful conduct, David Allison is entitled to injunctive relief, actual damages, Carroll's profits, exemplary damages, attorney's fees, and costs.

THIRD CLAIM FOR RELIEF
Common Law Unfair Competition

36. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

37. The aforesaid acts of Carroll constitute common law unfair competition in Colorado and other states where Carroll offers and/or advertises his goods, including this District, and violate of the common law of Colorado and laws of other states, by reason of which David Allison has suffered, and will continue to suffer, irreparable injury and monetary damages in an undetermined amount. Such actions were and are willful and deliberate.

38. As a result of Carroll's wrongful conduct, David Allison is entitled to injunctive relief, actual damages, Carroll's profits, exemplary damages, attorney's fees, and costs.

FOURTH CLAIM FOR RELIEF
Deceptive Trade Practices, Colorado Consumer Protection Act – Colo. Rev. Stat. § 6-1-105(1)

39. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

40. The aforesaid acts of Carroll constitute deceptive trade practices under the Colorado Consumer Protection Act, Colo. Rev. Stat. § 6-1-105(1). Such acts were undertaken willfully, wantonly and in bad faith.

41. David Allison has been injured by Carroll's deceptive trade practices taken in the course of his business. Carroll's deceptive trade practices have had and are continuing to have a significant impact on the consuming public that seeks cheat code information.

42. As a result of Carroll's deceptive trade practices, David Allison has been damaged. David Allison will continue to sustain irreparable injury and monetary damages from Carroll's deceptive trade practices unless and until Carroll is enjoined from continuing their unlawful conduct. David Allison is entitled to recover actual or statutory damages, Carroll's profits, exemplary damages, reasonable attorneys' fees, and costs in connection with this claim, as well as appropriate equitable relief.

FIFTH CLAIM FOR RELIEF

Violation of the Illinois Uniform Fraud and Deceptive Business Practices Act
815 ILCS 510/1 et seq.

43. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

44. Carroll's conduct, and the conduct of his representatives, creates a likelihood of misunderstanding and therefore violates the Illinois Uniform Deceptive Trade Practices Act.

SIXTH CLAIM FOR RELIEF

Illinois State Unfair Competition

45. David Allison repeats and realleges every allegation of this Complaint and incorporates them herein by this reference.

46. Carroll's conduct, and the conduct of his representatives, violates Illinois unfair competition law.

PRAYER FOR RELIEF

WHEREFORE, David Allison prays that this Court enter judgment in his favor on each and every claim for relief set forth above, and award David Allison all appropriate relief, including but not limited to the following:

- A. Declare that Defendant has infringed David Allison's copyrights covering his Copyrighted Web Pages.
- B. Declare that Defendant has engaged in unfair competition and deceptive trade practices, and has violated Section 43(a) of the Lanham Act, as well as Colorado and Illinois statutes and the common law.
- C. Order that, pursuant to 17 U.S.C. § 502 and/or 17 U.S.C. § 1203, Defendant and all of his employees, servants, agents, distributors, and persons in active concert or participation with it be preliminarily during the pendency of this action and permanently thereafter enjoined from copying, reproducing, modifying, displaying and/or distributing the *www.Ps3cheats.com* Web Pages and/or the Copyrighted Web Pages, or otherwise infringing David Allison's copyrights.
- D. Order the impounding for destruction of all copies or reproductions of any products containing unauthorized reproductions of David Allison's Copyrighted Web Pages, including but not limited to the *www.Ps3cheats.com* Web Pages.
- E. Order an accounting of Defendant's profits and award David Allison its actual damages and Defendant's profits not taken into account in calculating actual damages, including increased damages for willful violations of David Allison's rights.

- F. Award David Allison monetary relief in an amount to be fixed by the Court in its discretion as just, including:
- (a) All profits received by Defendant from sales and revenues of any kind made as a result of its infringing or otherwise wrongful actions;
 - (b) All damages sustained by David Allison as a result of Defendant's acts, and that such damages be trebled pursuant to 15 U.S.C. § 1117 and/or 18 U.S.C. § 1964(c), and Colo. Rev. Stat. § 6-1-113; and
 - (c) Exemplary damages in view of the intentional, malicious, and bad faith nature of Defendant's actions.
- G. Award David Allison prejudgment and post-judgment interest, and David Allison's costs and attorney's fees.
- H. Award David Allison such other relief as this Court deems just and appropriate.

JURY DEMAND

Plaintiff David Allison, doing business as Cheat Code Central, demands a trial by jury on all issues so triable.

Respectfully submitted this 15th day of October, 2007

s/ Jared B. Briant

Darrell M. Daley

Jared B. Briant

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