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,

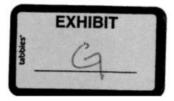
Defendant.

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 of 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.
- 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
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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.

Register of Copyrights, United States of America

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Case 2:08-cv-00157-MHW-MRA Document 64-6 Filed 03/05/10 Page 17 of 306

SJS 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.)

I. (a) PLAINTIFFS				DEFENDANTS		
	DAVID ALLISON, doing business as CHEAT CODE CENTRAL, a sole proprietorship,			JOHN DOE		
(b) County of Residence	of First Listed Plaintiff	roomfield County, CC)	County of Residence	of First Listed Defendant	N/A
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				NOTE: IN LAN	D CONDEMNATION CASES, U	SE THE LOCATION OF THE
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(c) Attorney's /Firm Nama	Address, and Telephone Number	.		Attorneys (If Known)		
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CONTRACT	ТОК		FOR	FEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
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120 Marine	☐ 310 Airplane ☐ 315 Airplane Product	☐ 362 Personal Injury - Med. Malpractice		20 Other Food & Drug	423 Withdrawal 28 USC 157	410 Antitrust
☐ 130 Miller Act ☐ 140 Negotiable Instrument	Liability	365 Personal Injury -		25 Drug Related Seizure of Property 21 USC 881	28 USC 157	☐ 430 Banks and Banking ☐ 450 Commerce
■ 150 Recovery of Overpayment	☐ 320 Assault, Libel &	Product Liability		30 Liquor Laws	PROPERTY RIGHTS	460 Deportation
& Enforcement of Judgment 151 Medicare Act	Slander 330 Federal Employers'	☐ 368 Asbestos Persona Injury Product		640 R.R. & Truck 650 Airline Regs.		470 Racketeer Influenced and Corrupt Organizations
☐ 152 Recovery of Defaulted	Liability	Liability		60 Occupational	840 Trademark	480 Consumer Credit
Student Loans (Exel. Veterans)	☐ 340 Marine ☐ 345 Marine Product	PERSONAL PROPER 370 Other Fraud		Safety/Health 990 Other		☐ 490 Cable/Sat TV ☐ 810 Selective Service
☐ 153 Recovery of Overpayment	Liability	371 Truth in Lending		LABOR	SOCIAL SECURITY	■ 850 Securities/Commodities/
of Veteran's Benefits 160 Stockholders' Suits	350 Motor Vehicle	■380 Other Personal		10 Fair Labor Standards	861 HIA (1395 ff)	Exchange
190 Other Contract	355 Motor Vehicle Product Liability	Property Damage 385 Property Damage	7	Act 20 Labor/Mgmt. Relations	■ 862 Black Lung (923) ■ 863 DIW C/DIWW (405(g))	875 Customer Challenge 12 USC 3410
☐ 195 Contract Product Liability	☐ 360 Other Personal	Product Liability	🗆 7	30 Labor/Mgmt.Reporting	■ 864 SSID Title XVI	■ 890 Other Statutory Actions
☐ 196 Franchise REAL PROPERTY	Injury CIVIL RIGHTS	PRISONER PETITION	,	& Disclosure Act 40 Railway Labor Act	865 RSI (405(g)) FEDERAL TAX SUITS	□ 891 Agricultural Acts □ 892 Economic Stabilization Act
210 Land Condemnation	441 Voting	☐ 510 Motions to Vacate	=	90 Other Labor Litigation	■ 870 Taxes (U.S. Plaintiff	893 Environmental Matters
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Thu Feb 22 16:45:33 2007

UNITED STATES DISTRICT COURT

DENVER

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C.C. Number: SEE CC REC

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Sub Acct Type Tender 1:510000 N 4 2:086900 N 4 3:086400 N 4 Amount 190.00 60.00 100.00

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.craveonline.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.craveonline.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://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 of 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 C	OLORADO)
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. and knows the	That he has read the above and foregoing Verified Complaint and Jury Demand contents thereof; and
3. and belief.	That the facts therein set forth are true and correct to the best of his knowledge
CLIDG	/s/ David Allison David Allison
	CRIBED AND SWORN TO before me, a notary public, in and for said County <u>24th</u> day of <u>June</u> , 2005.
	/s/ Maisie Livengood Notary Public
My Commissi _12/12/08	on Expires:
[SEAL	.]

Respectfully submitted this <u>24th</u> 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

JUCase2008-ta-00157-MHWEVIRPRODDissument 64-6 Filed 03/05/10202200894 of 202/05 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 Geters
Register of Copyrights, United States of America

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CONTINUATION SHEET FOR APPLICATION FORMS

- This Continuation Sheet is used as conjunction with Forms CA, PA, SE, SR, TX, and VA, entry, indicate which bests from your sex continuing in the space in the upper right-hand corner.
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- Space A of this sheet is intended to identify the basic application.
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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	38.	Asterix And Obelix: Kick Buttix
	Kings	39.	Astro Boy
8.	Aggressive Inline	40.	Athens 2004
9.	Air Ranger: Rescue Helicopter	41.	ATV Offroad Fury
10.	Air Ranger 2: Rescue Helicopter	42.	ATV Offroad Fury 2
11.	Airblade	43.	ATV Offroad Fury 3
12.	AirForce Delta Strike	44.	ATV Quad Power Racing 2
13.	Alias	45.	Auto Modellista
14.	Alien Hominid	46.	Adventures Of Cookie And Cream
15.	Aliens vs. Predator: Extinction	47.	Backyard Basketball
16.	All-Star Baseball 2002	48.	Backyard Wrestling
17.	All-Star Baseball 2003	49.	Backyard Wrestling 2: There Goes
18.	All-Star Baseball 2004		The Neighborhood
19.	All-Star Baseball 2005	50.	Bad Boys 2
20.	All-Star Professional Wrestling	51.	<u>Barbarian</u>
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.	<u>Amplitude</u>	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.	<u>Bionicle</u>
29.	Arc The Lad: Twilight Of The	60.	Black And Bruised
	<u>Spirits</u>	61.	Blade 2
30.	Arctic Thunder	62.	Bloody Roar 3
31.	Armored Core 2	63.	Bloody Roar 4

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TAB 1

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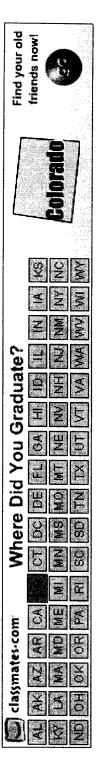
• Infinite creation points

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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Triple Play Baseball (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, Ev... Page 1 of 2



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Triple Play Baseball (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, Ev... Page 2 of 2



Triple Play Baseball

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

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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TAB 2

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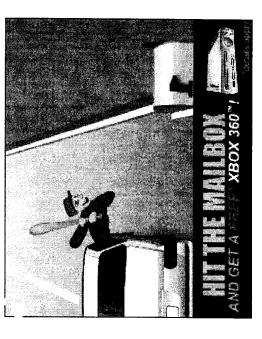
tem is better? Vote & Which next generation

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Jet X20

(Last updated: March 28, 2003)





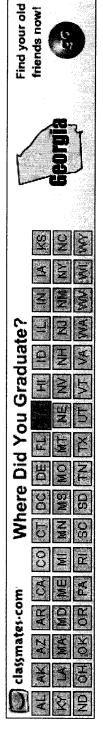
Quick start

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) EE81128A BCC67F9A
Boost Never Decreases DE DE	DE8AA436 BF899B8B DE8AA432 BCA99B83 DE8A9BB6 BF899B8B DE8A9BB2 BCA99B83
Ride Through Walls DE	DE88980E BF899B8B DE88980A BCA99B83
Disable A.I.	DE98B262 BCA99B83
Big Waves DE	DE938A8A FD499B83
No Waves DE	JE938A8A BCA99B83
Turbo Waves DE	DE94A14E 7B999B83
Waves Don't Move DE	DE94A14E BCA99B83
More Lift When Jumping DE938A5A 10719B83	E938A5A 10719B83

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Exhibit C Page 13

Jet X20 (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQuest II, ...



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

Boost Never DecreasesDE8AA436 BF899B8BDE8AA432 BCA99B83DE8A9BB6 BF899B8BDE8A9BB2 BCA99B83 Master Code (Must Be On)0E3C7DF2 1853E59EEE81128A BCC67F9A

Ride Through WallsDE88980E BF899B8BDE88980A BCA99B83

Disable A.I.DE98B262 BCA99B83

Big WavesDE938A8A FD499B83

[urbo WavesDE94A14E 7B999B83 No WavesDE938A8A BCA99B83

Waves Dont MoveDE94A14E BCA99B83

More Lift When JumpingDE938A5A 10719B83

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Arctic Thunder Cheats, Codes, Secrets, FAQs for PlayStation 2 (PS2)

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Which next generation



Arctic Thunder

(Last updated: October 19, 2001)



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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

Exhibit C Page 17

has no effect in point races.

Arctic Thunder Cheats, Codes, Secrets, FAQs for PlayStation 2 (PS2)

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.

Arctic Thunder Cheats, Codes, Secrets, FAQs for PlayStation 2 (PS2)

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

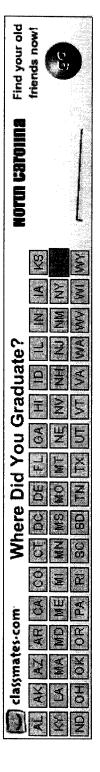
At the screen after startup (before choosing a player), press Square(2), Circle, Square, R2, Square, Start. Note: This has no effect in points races.

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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http://www.cheatcc.com/psx2/at.html

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Arctic Thunder (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQu... Page 1 of 3

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Arctic Thunder (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQu... Page 2 of 3

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.

http://www.craveonline.com/games/cheats/ps2/cheat.php/Arctic+Thunder

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

Arctic Thunder (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQu... Page 3 of 3

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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Commandos 2: Men Of Courage Cheats, Codes, Secrets, FAQs for Xbox (XB)

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Bonus missions

Exhibit C Page 26

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.



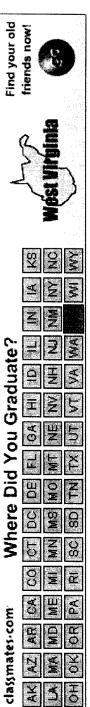
Commandos 2: Men Of Courage

(Last updated: October 14, 2002)



Back To Xbox Index

Commandos 2: Men Of Courage Cheats, Codes, Secrets, FAQs for Xbox (XB)





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Commandos 2: Men Of Courage (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San ... Page 1 of 2



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Exhibit C Page 29

× Commandos 2: Men Of Courage XOOX

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

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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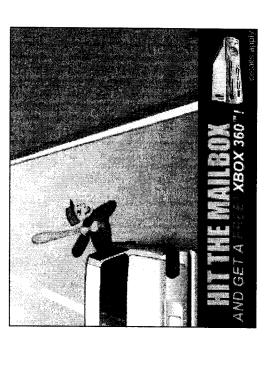
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ESPN NBA 2Night 2002

(Last updated: May 8, 2002)



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Spider Man 2 Cheats Spider Man 2 Cheats & 1 200,000 Stores.

Exhibit C Page 33

s. Reviews.

Better performance

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

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

Better shooting

Page 2 of 3

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.

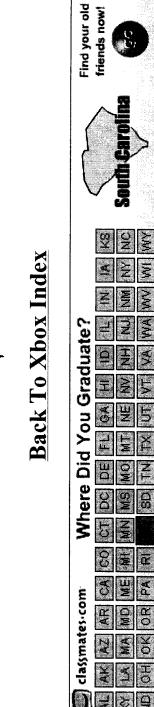
No spectators

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.





http://www.cheatcc.com/xb/espnnba2n2002.html

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ESPN NBA 2Night 2002 (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andrea... Page 1 of 3

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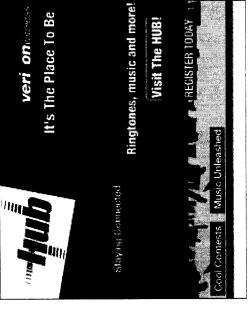




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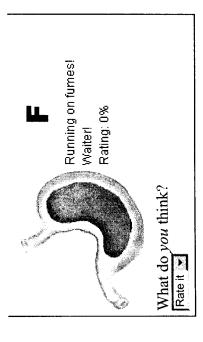
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ESPN NBA 2Night 2002 (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andrea... Page 2 of 3

× ESPN NBA 2Night 2002

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

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.

http://www.craveonline.com/games/cheats/xbox/cheat.php/ESPN+NBA+2Night+2002

Big hands

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

ESPN NBA 2Night 2002 (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andrea... Page 3 of 3

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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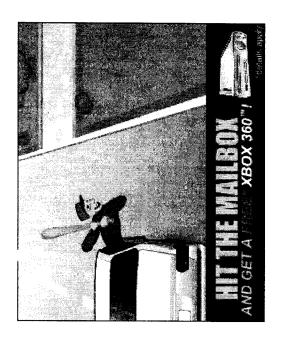
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NCAA College Basketball 2K3

(Last updated: January 17, 2003)



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Aliases

The following colleges have their identities altered in the game:

College

California Polytechnic Alcorn State

Jackson South

California Coastside

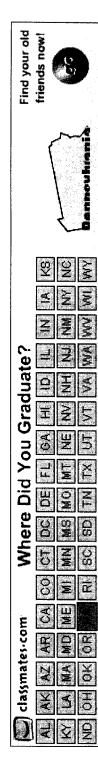
State University of Virginia Fontainebleu University Oakland Union College Central Colorado State Garden State College Washington College South Georgia State Northwestern State New York College Fennessee College Maryland College Central California SB Del Mar State Charleston State Houston College Loyola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

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NC A&M

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NCAA College Basketball 2K3 Cheats, Codes, Secrets, FAQs for Xbox (XB)

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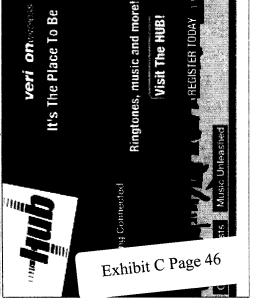












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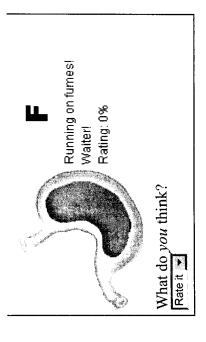
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Thursday, December 16, 2004 Posted: 12:00 AM PT

zi N

Aliases

The following colleges have their identities altered in the game:

CollegeAlias

Alcorn StateJackson South

California PolytechnicCalifornia Coastside

Charleston SouthernCharleston State

DenverCentral Colorado State Gardner-Webb College(none)

Grambling StateOuachita State

HamptonState University of Virginia

HowardWashington College

IPFWNC College LipscombTennessee College

Loyola-ChicagoLoyola (Illinois) Loyola-MarylandMaryland College

Manhattan Manhattan State

Morris BrownAtlanta College Nicholls StateFontainebleu University

Northwestern LouisianaNorthwestern State

Oakland (MI)Oakland Union College

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http://www.craveonline.com/games/cheats/xbox/cheat.php/NCAA+College+Basketball+2K3

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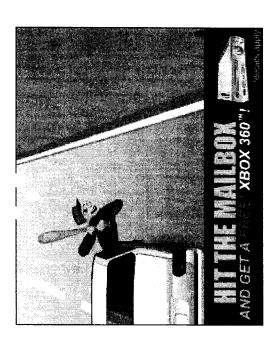
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SNK vs. Capcom: SVC Chaos

(Last updated: November 17, 2004)



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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.

SNK vs. Capcom: SVC Chaos Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

selectable character in all modes. To choose the Red Demon, highlight Tabasa at the character selection screen, Enter survival mode. Defeat the opponents until you face the Red Demon. Defeat him to unlock him as a 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

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

Play as Zero

SNK vs. Capcom: SVC Chaos Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

selection screen by holding R over the four top characters of the inner most rows of both sides. The following Alternately, you can access all the hidden characters except Red Demon and Young Athena on the character 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 Back To Xbox Index

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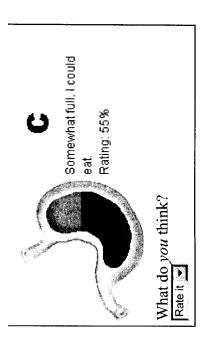
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X SNK vs. Capcom: SVC Chaos

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

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.

http://www.craveonline.com/games/cheats/xbox/cheat.php/SNK+vs.+Capcom:+SVC+Chaos

Play as Red Demon

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 same. 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

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.

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, phighlight 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 the characters of the inner most rows of both sides. The following characters can be accessed by holding R while on the standard characters location at the selection screen:

Exhibit C Page 58 Kyo: Geese

Terry: Mars People

http://www.craveonline.com/games/cheats/xbox/cheat.php/SNK+vs.+Capcom:+SVC+Chaos

SNK vs. Capcom: SVC Chaos (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San A... Page 4 of 4

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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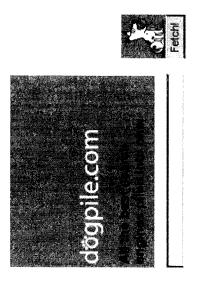
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Star Wars: Battlefront

(Last updated: November 17, 2004)



Strategy Guide

All planets

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.

Baby Wars mode

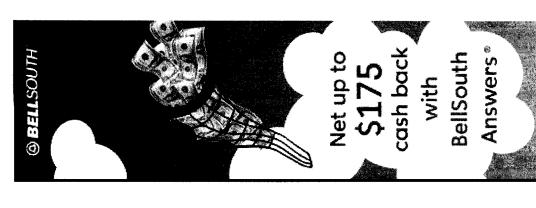


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Enter "Jub Jub" as a case-sensitive profile name. All the models in the game will use the Ewok skeleton and turn the game into "Baby Wars". All infantry units will be half their normal size, and their head seems to be much closer to their shoulders.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

Star Wars: Battlefront Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

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

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

pulls back, order your troops to follow you, and lead them head onto the enemy. Note: This cannot be done with 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 droids.

Bomb run

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

http://www.cheatcc.com/xb/swbf.html

Sniping location

Star Wars: Battlefront Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

Killing Droidekas

its shields up, stand in front of it, almost in the shield. The way the blasters are set up, the game glitches and will A Driodeka is usually difficult to defeat with its shields up. If one is rolling, run directly next to it. When it puts 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 other vehicle. Another way to defeat the walkers is to take control of the Snowspeeder as the pilot. When you get times around, and it will explode. Also, always attack the AT-AT in the back to avoid laser cannon fire from the near the walkers, switch places so that you are in control of firing the tow cable. When the cable is attached, the you fly to an AT-AT, pull back the Right Analog-stick and start circling it, while trying to stay low to avoid its aser cannons. Eventually your copilot will shoot the towing cable at its legs. Continue circling for about four CPU pilot in the speeder with you will complete the final wrap around.

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

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

http://www.cheatcc.com/xb/swbf.html

Art and photo gallery

Star Wars: Battlefront Cheats, Codes, Secrets, FAQs for Xbox (XB)

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) 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) Kamino Storyboards: Kamino - Assault On Kamino (Historical Campaigns: Clone Wars) Endor Stills: Bespin - Battle in the Clouds (Historical Campaigns: Galactic Civil War) Hoth Concept Art: Hoth - Battle of Hoth (Historical Campaigns: Galactic Civil War) Geonosis Stills: Geonosis - Battle Of Geonosis (Historical Campaigns: Clone Wars) Naboo Stills: Naboo - Rebellion On Theed (Historical Campaigns: Clone Wars)

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.

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).



http://www.cheatcc.com/xb/swbf.html

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Star Wars: Battlefront Cheats, Codes, Secrets, FAQs for Xbox (XB)



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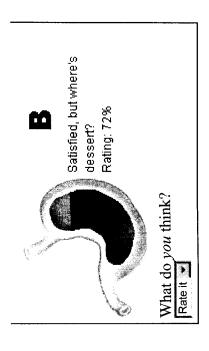


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H Xbox Cheats Index 0 2

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Crave Raves



X Star Wars: Battlefront

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

Strategy Guide

All planets

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.

Baby Wars mode

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

Page 3 of 5

Case 2:08-cv-90157-MHW-MRA Page

Recon Droid

up, making them even more difficult for opponents to destroy.

The snipers 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.

Star Wars: Battlefront (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, ...

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 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 boun mayour process.

jetpack to fully charge. When you are ready, jump into the air and start throwing grenades wherever a big cluster of enemies are round. The start through 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, because he can hover instead of jumping high and he has more grenades. For example, if you are a 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, jumping 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 grenades 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 grenades in one location and focus a few or all your grenades in one location. Also, if a grenades in one location. Also, if a grenades in one location and focus a few or all your grenades in one location. Also, if a grenades in one location and focus a few or all your grenades in one location. Also, if a grenades in one location and focus a few or all your grenades in one location. Also, if a grenades in one location and focus a few or all your grenades in one location. Also, if a grenades in one location are represented in the process of the grenades in one location and grenades in one location. Also, if a grenades in one location are represented in the grenades in one location and grenades in one locat

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 Driodeka 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 of P

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. Doon of him as many times as desired.

Killing Tusken Raiders

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.

Exhibit C Page 70

To defend your AT-ATs against Snowspeeders, simply move them close together. To wrap around the AT-ATs 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.

Bespin Concept Art: Bespin - The Liberation of Cloud City (Historical Campaigns: Galactic Civil War)

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

Art and photo gallery

Endor Stills: Bespin - Battle in the Clouds (Historical Campaigns: Galactic Civil War)

Kamino Storyboards: Kamino - Assault On Kamino (Historical Campaigns: Clone Wars)

Naboo Stills: Naboo - Rebellion On Theed (Historical Campaigns: Clone Wars)

Hoth Concept Art: Hoth - Battle of Hoth (Historical Campaigns: Galactic Civil War) Geonosis Stills: Geonosis - Battle Of Geonosis (Historical Campaigns: Clone Wars)

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)

Page 4 of 5

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

Star Wars: Battlefront (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, ...

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

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 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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http://www.craveonline.com/games/cheats/xbox/cheat.php/Star+Wars:+Battlefront

Star Wars: Battlefront (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, ... 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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Burnout

(Last updated: June 27, 2002)

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Strategy Guide

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

Burnout Cheats, Codes, Secrets, FAQs for Xbox (XB)

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.

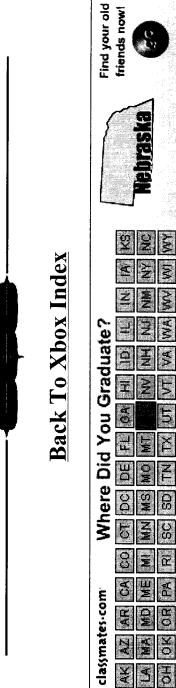
Full bonus

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.





http://www.cheatcc.com/xb/burnout.html

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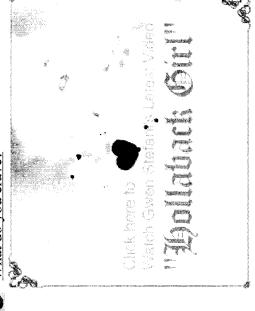


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PS2 Cheats Index

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Burnout (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQuest II, ...



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

Roadster

Roadster

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

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

Saloon GT

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http://www.craveonline.com/games/cheats/ps2/cheat.php/Burnout

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 Races4CADF902 145625DD

Infinite Credits4CBB7938 1456089C4CBC83E8 1456089C4CA26E78 1456089C

Unlock Survival Mode3CA215C4 1456E7A5

Unlock All Cars1CA21528 1456E7A51CA2152C 1456E7A51CA21530 1456E7A51CA2152E 1456E7A51CA21538 1456E7A51CA21538

1456E7A51CA2153C 1456E7A51CA21540 1456E7A5

Unlock All Tracks3CA2154C 1456E7A53CA21554 1456E7A53CA2155C 1456E7A53CA21564 1456E7A53CA2156C 1456E7A53CA21574 1456E7A5 Unlock All Face-Offs3CA215B4 1456E7A53CA215B8 1456E7A53CA215BC 1456E7A53CA215C0 1456E7A5

Perfect Stats in Single Race AverageSpeed, Best Lap, etc.1CBCA938 1456E7A51CBCA93C 1456E7A61CBCA918 1456E7A51CBCA91C 1456E7A61CBCA8F8 17E9C70C1CBCABD8 17E9C70C1CBCAAB8 17E9C70C

Perfect Stats in Championship RaceAverage Speed, Best Lap, etc.1CBC91D8 1456E7A51CBC91D8 1456E7A61CBC90B8 1456E7A51CBC90BC

EF7528C51CA7B894 F36E14821CA7B898 14563C97

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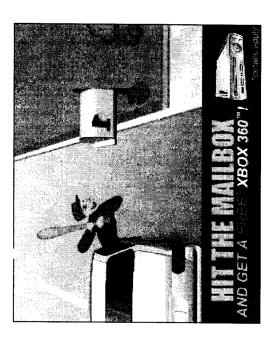
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The Hulk

(Last updated: June 19, 2003)



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Playstation 3 vs Xbox

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Invulnerability

Regenerator

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

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.

6/22/2005

http://www.cheatcc.com/xb/hulk.html

The Hulk Cheats, Codes, Secrets, FAQs for Xbox (XB)

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.

http://www.cheatcc.com/xb/hulk.html

The Hulk Cheats, Codes, Secrets, FAQs for Xbox (XB)

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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The Hulk Cheats, Codes, Secrets, FAQs for Xbox (XB)

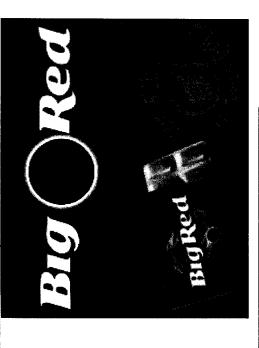


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The Hulk (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQuest II,... Page 1 of 4

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Xbox Cheats Index

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The Hulk (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQuest II,... Page 2 of 4



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

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 regenerated 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 of 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 of 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 of 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 of 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 of 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 of the "Code Input" selection at the options screen, then enter "ANGMNGT" as a code to unlock this option at the options screen, then enter "ANGMNGT" as a code to unlock this option at the options screen, then enter "ANGMNGT" as a code to unlock this option at the option a

remains full.

Infinite Continues

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Double Hulks HP

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

Exhibit C Page 91

The Hulk (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQuest II,... Page 3 of 4 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 had 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.

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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.

http://www.craveonline.com/games/cheats/xbox/cheat.php/The+Hulk

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6/23/2005

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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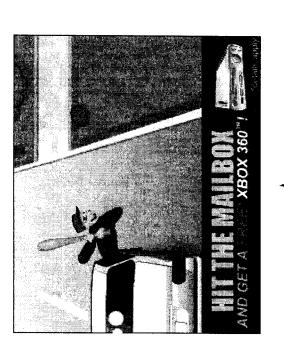
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Seablade

(Last updated: February 27, 2003)



Mission select

Answers®

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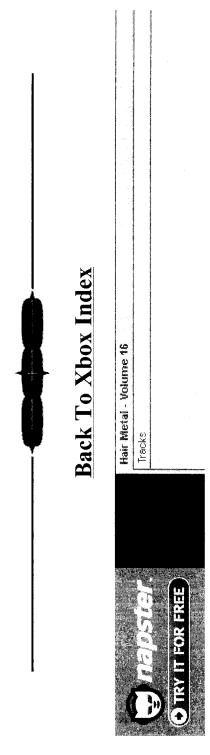
Pause the game and press X, Y, L, X, R(2). Exit to the mission selection screen and all of them will be unlocked.

Invincibility

Exhibit C Page 96

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. 6/23/2005

Seablade Cheats, Codes, Secrets, FAQs for Xbox (XB)



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Seablade (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQuest II, ... Page 1 of 2



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Seablade (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQuest II, ... Page 2 of 2



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

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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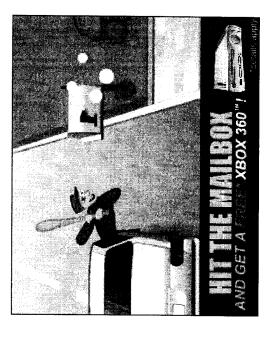
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6/23/2005

BOY 10 SHIPS!

Chase: Hollywood Stunt Driver

(Last updated: February 27, 2003)



Strategy Guide

Level select

eFreeGames.com

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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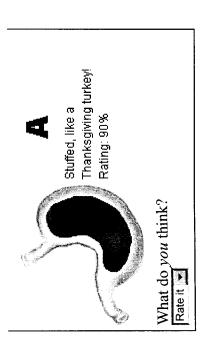
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Crave Raves

6/22/2005

http://www.craveonline.com/games/cheats/xbox/cheat.php/Chase:+Hollywood+Stunt+Driver



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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FIFA 2005

(Last updated: December 1, 2004)



Strategy Guide

Easy goals

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

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

FIFA 2005 Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

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 near there. Also, make sure the accuracy is in the middle of the green. The ball will shoot over the wall and into 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 no need to bend the ball and take the free kick. Try this in practice mode. Additionally, to score a free kick, put 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 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 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

make the necessary substitutions. This is an easy way to play on professional or world class level, and give your 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), players all the needed stats.

FIFA 2005 Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

Skip <u>music/EA</u> 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:

http://www.cheatcc.com/xb/fifa2005.html

Win The LDV Vans Trophy (England): 6,000 points Win The Community Shield (England): 6,000 points Win The Deutscher Pokal (Germany): 6,000 points Win The Coupe de la Ligue (France): 6,000 points Win a Match with a National Team: 6,000 points Go To Tournament Creator Mode: 1,000 points Win The Copa de España (Spain): 6,000 points Win The Coppa Nazionale (Italy): 6,000 points 10 Game Win Streak (Career): 6,000 points Win The Austrian Bundesliga: 6,000 points Play a Football Fusion match: 2,000 points 5 Game Win Streak (Career): 2,000 points Win The Austrian OFB Cup: 6,000 points Win The Danish Superligaen: 6,000 points Win The Supercopa (Spain): 6,000 points Go To Tournament Mode: 1,000 points Get Your Team Promoted: 6,000 points Win The Brazilian League: 6,000 points Win The Coupe de France: 6,000 points Win The Belgian FA Cup: 6,000 points Win The MLS Open Cup: 6,000 points Win The Belgian League: 6,000 points Go To Set Pieces Screen: 1,000 points Win The Brazilian Cup: 6,000 points Go To Practice Mode: 1,000 points Win The DONG Cup: 6,000 points Go To Career Mode: 1,000 points Win a PK Shootout: 6,000 points Qualify For Europe: 4,000 points Beat a Rival Team: 2,000 points Beat a 5 star team: 2,000 points Get a Clean Sheet: 2,000 points Score a Hat Trick: 6,000 points Win by 5 + Goals: 6,000 points Go To Jukebox: 1,000 points Create a Player: 6,000 points Play Online: 4,000 points

Win The Dt. Super-Cup (Germany): 6,000 points

Vin The Dutch Cup: 6,000 points

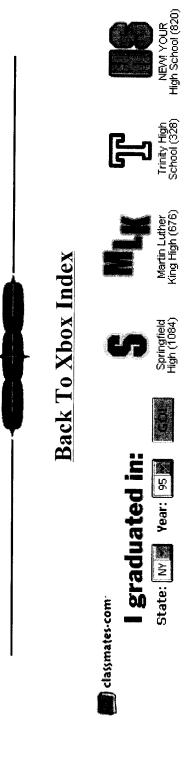
http://www.cheatcc.com/xb/fifa2005.html

Win The Americas Club Championship: 6,000 points Win The Supercoppa Nazionale (Italy): 6,000 points Win The Trophée Champions (France): 6,000 points Win The Swiss Axpo Super League: 6,000 points Win The Scottish Premier League: 6,000 points Score a goal with a created player: 8,000 points Win The Norwegian Tippeligaen: 6,000 points Win The League Cup (England): 6,000 points Win The Portuguese SuperLiga: 6,000 points Win The German Bundesliga 1: 6,000 points Win The German Bundesliga 2: 6,000 points Win The European Super Cup: 6,000 points Win The Swedish Allsvenskan: 6,000 points Win The FA Premier League: 6,000 points Win Football League Champ: 6,000 points Win The Norwegian FA Cup: 6,000 points Win The Mexican Apertura: 6,000 points Win The French Division 2: 6,000 points Win The Mexican Clausura: 6,000 points Win Football League Two: 6,000 points Win The Dutch Eredivisie: 6,000 points Win Football League One: 6,000 points Win The Scottish FA Cup: 6,000 points Win The Spanish Segunda: 6,000 points Become a 5 star manager: 10,000 points Win The Spanish Primera: 6,000 points Win The Portuguese Cup: 6,000 points Win The Italian Serie A: 6,000 points Win The Italian Serie B: 6,000 points Win French Division 1: 6,000 points Win The Copa del Rey: 6,000 points Win The Swedish Cup: 6,000 points Win The English Cup: 6,000 points Complete career mode: 8,000 points Win The Swiss Cup: 6,000 points Win The K-League: 6,000 points Win The MLS: 6,000 points Win The EFA: 6,000 points Win The ECC: 6,000 points

http://www.cheatcc.com/xb/fifa2005.html

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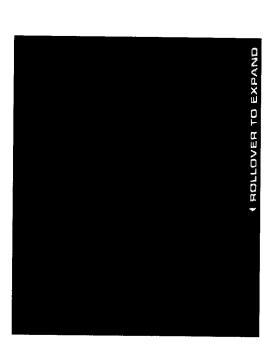
FIFA 2005 Cheats, Codes, Secrets, FAQs for Xbox (XB)



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FIFA 2005 (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQuest I... Page 2 of 6



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

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 be easily fake the goalie out on the omosite team, press Black, The goalie will dive to a hall that is not the goalie out on the omosite team, press Black, The goalie will dive to a hall that is not the goalie out on the omosite team, press Black, The goalie out on the omosite team, press Black, The goalie will dive to a hall that is not the goalie out on the omosite team, press Black, The goalie will dive to a hall that is not the goalie out on the omosite team, press Black, The goalie will dive to a hall that is not the goalie out on the omosite team, press Black, The goalie out on the goalie of the goalie out on the goalie out of the 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 because it bends itself. 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

FIFA 2005 (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQuest I... Page 3 of 6

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 severage 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, 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 operation of the consuming of the consumination of the co

This trick works well in career mode, our is calculated with a star of birth to the star of high and only enough.

Tating of half a star or one star (for example, Chattertown in Football League 2). After doing this, release the best players on that team to set their year of birth to 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 players to have 18. Create a perfect goalie to keep on your roster. Next, create about fifteen goalies that you put the players on as 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 forgers and 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, occause 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

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 Rival Team: 2,000 points Beat a 5 star team: 2,000 points

Get a Clean Sheet: 2,000 points

Play a Football Fusion match: 2,000 points

Oualify 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

Win a Match with a National Team: 6,000 points 10 Game Win Streak (Career): 6,000 points

Win The Austrian OFB Cup: 6,000 points Win a PK Shootout: 6,000 points Win by 5 + Goals: 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

Win The Brazilian League: 6,000 points Win The Brazilian Cup: 6,000 points

Win The LDV Vans Trophy (England): 6,000 points Win The Community Shield (England): 6,000 points

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http://www.craveonline.com/games/cheats/xbox/cheat.php/FIFA+2005

FIFA 2005 (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQuest I... Page 5 of 6

Win The Deutscher Pokal (Germany): 6,000 points

Win The Danish Superligaen: 6,000 points

Win The DONG Cup: 6,000 points

Win The Dt. Super-Cup (Germany): 6,000 points

Win The Dutch Eredivisie: 6,000 points

Win The ECC: 6,000 points Win The EFA: 6,000 points

Win The Dutch Cup: 6,000 points

Win The Coupe de la Ligue (France): 6,000 points

Win The Coupe de France: 6,000 points

Win The Copa de España (Spain): 6,000 points Win The Coppa Nazionale (Italy): 6,000 points

Win The Supercopa (Spain): 6,000 points

Win The Supercoppa Nazionale (Italy): 6,000 points

Win The Spanish Segunda: 6,000 points Win The Spanish Primera: 6,000 points

Win The Swedish Allsvenskan: 6,000 points

Vin The Swedish Cup: 6,000 points

Win The Scottish Premier League: 6,000 points

Win The Italian Serie A: 6,000 points Win The Italian Serie B: 6,000 points

Win The Portuguese SuperLiga: 6,000 points

Win The Norwegian Tippeligaen: 6,000 points

Win The Portuguese Cup: 6,000 points

Win The Norwegian FA Cup: 6,000 points

Win The Mexican Apertura: 6,000 points Win The French Division 2: 6,000 points

Win The MLS: 6,000 points

Win The League Cup (England): 6,000 points

Win The K-League: 6,000 points

Win French Division 1: 6,000 points

Win The German Bundesliga 1: 6,000 points Win The German Bundesliga 2: 6,000 points

Win The FA Premier League: 6,000 points

Win The Scottish FA Cup: 6,000 points

Win The English Cup: 6,000 points

Win The European Super Cup: 6,000 points

Win Football League Champ: 6,000 points

Win Football League One: 6,000 points Win Football League Two: 6,000 points http://www.craveonline.com/games/cheats/xbox/cheat.php/FIFA+2005

Win The Swiss Axpo Super League: 6,000 points

FIFA 2005 (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQuest I... Page 6 of 6

Win The Trophée Champions (France): 6,000 points Win The Americas Club Championship: 6,000 points

Win The Swiss Cup: 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

Become a 5 star manager: 10,000 points

Complete career mode: 8,000 points

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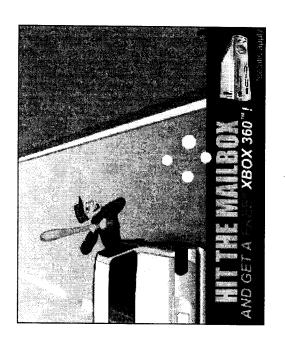
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The Lord Of The Rings: The Two Towers

(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

The Lord Of The Rings: The Two Towers Cheats, Codes, Secrets, FAQs for Xbox (XB)

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.

http://www.cheatcc.com/xb/lotrttt.html

Devastating attacks

The Lord Of The Rings: The Two Towers Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

http://www.cheatcc.com/xb/lotrttt.html

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

John Rhys-Davis interview

The Lord Of The Rings: The Two Towers Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

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 Elrond's, Islidur's, or Balin's Judgment. Work on using it and getting very proficient with it. After mastering it, This trick is easiest when done with Legolas because of the way he moves. After you get to level 8, purchase 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

The Lord Of The Rings: The Two Towers Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

Look for a barrel in the area of the fire. Smash it with a speed attack and water will flow out, extinguishing any 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. fires it can.

Defeating Lurtz (as Aragorn)

Lurts starts by shooting arrows. Deflect them with your sword then fire a charged arrow at him. Keep repeating stick in, then be open for an attack. Use the Y thrust. Normally, two shots can be dealt and sometimes a third if 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, 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

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

http://www.cheatcc.com/xb/lotrttt.html

The Lord Of The Rings: The Two Towers Cheats, Codes, Secrets, FAQs for Xbox (XB)

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 climinate it. Continue to parry the Overseer's charges. It will rear up after every second charge, at which time you 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 to cause damage. Occasionally the Overseer will call in another Warg to help. Fire projectiles at this "helper" to When you first encounter the Orc Overseer, he will have approximately four other Warg Riders with him. can move in and eliminate him.

When you first see the Orc Overeseer, 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 combos, etc. This takes about half of his life away. He will send in a warg ally, which is useful. Whenever you you. Parry those attacks. After about two charges, he will rear his Warg. Instead of going behind at this point, attack him because his Warg will bite and lift you into the air for the Orc Overseer to slash. He will charge at shoot it with an axe/arrow. It will fall and whine. Then, move in and slash the overseer with fierce attacks, 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 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 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



Back To Xbox Index



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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.

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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.

For some 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.

Base 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.

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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

Exhibit C Page 135

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

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 5 of 6 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

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, Amonobeton, Pains 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 an "Excellent" rank, just by killing one or two Orcs, and egetting "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 Gimps. 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 of 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. Smashar with a speed attack and water will flow out, extinguishing any fires it can.

Defeating Lurtz (as Aragorn)

Lurts 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 useff?

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 stopologon, you will be facing just the Orc Overseer slashes at you. He also charges and the Warg swerves to hit you and succeeds with all wards 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, 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 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

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 (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. When you first encounter the Orc Overseer, he will have approximately four other Warg Riders with him. Dispatch these using any means necessary

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 Overeseer, he will have about four other allies with him. These are easy to kill. Do so, and you will face the Orc Overseer. You When you first see the Orc Overeseer, ne will nave about rous ourse, many many many will bite and lift you into the air for the Orc Overseer's 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's cannot shoot him, because he deflects your arrows/axes, and you cannot attack him because his will because he deflects your arrows/axes, and you cannot attack him because his will because him behind at this point, shoot it with an 6000 hims believe the contract of the organization of the contract of the organization of the

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 the awarg 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 onceyonly, 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 onceyagain. Repeat this until it is dead.

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EXHIBIT C

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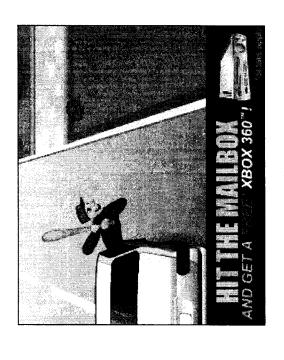
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ESTROY 10 SHIPS!

Ninja Gaiden

(Last updated: October 30, 2004)



Strategy Guide

Always have starting costume

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

Alternate costumes

Ninja Gaiden Cheats, Codes, Secrets, FAQs for Xbox (XB)

Game" option at the opening menu to wear the Ninja Of The Future costume. Successfully complete the game on Successfully complete the game on the normal or hard difficulty settings. Then, hold L while selecting the "New 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.

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

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originally missed until you have the required 50 Scarabs. After giving them to Muramasa, you will get the Ninja 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 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

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

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 Get a "Master Ninja" rank in all levels on the hard or very hard difficulty settings to unlock the original Ninja 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 <u>classic games</u> easier

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. Instead of going to the first floor of Han's Bar, use the following trick to start the games from the main menu.

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

Ninja Gaiden Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

Dark Dragon Blade

the part to upgrade your Dragon Sword to the final level, jump into the open house and stay on the top level. The 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 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.

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

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

In-game reset

Ninja Gaiden Cheats, Codes, Secrets, FAQs for Xbox (XB)

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 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. hit them. You should either throw them with the guillotine throw or slice their heads off. If they keep trying to

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

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

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

Ninja Gaiden Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

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 respawn. You can repeat the process as many times as desired. There is also a save point next to Han's bar. Save 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 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

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

Armlet of Fortune: 10 Scarabs Vigoorian Flail: 15 Scarabs Wooden Sword: 5 Scarabs

Armlet of the Moon: 20 Scarabs Dabilahro: 25 Scarabs

Armlet of Benediction: 35 Scarabs Jewel of Demon Seal: 40 Scarabs Armlet of the Sun: 30 Scarabs

Armlet of Tranquility: 45 Scarabs Dark Dragon Blade: 50 Scarabs

Unlock safe in monk's room

Ninja Gaiden Cheats, Codes, Secrets, FAQs for Xbox (XB)

until "1", then press X. Press Analog-stick Left until "2", then press X. If done correctly, each time you press X a Left until you reach "2", then press X. Press Analog-stick Right until "7", then press X. Press Analog-stick Right 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 To unlock the safe in the monk's room for the first time you need to enter this combination: press Analog-Stick 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.

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 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 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

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 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 compo.

Defeating Spirit Doku

Defeating the Dragon Boss

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To defeat him, try to level up your Lightning Ninpo to the maximum. Constantly run left or right. When he flaps immediately afterwards; throw in a Ninpo just after that attack. If you need to use a Great Devil Elixer, it will be 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

Defeating Spirit Piranha

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

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

Ninja Gaiden Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

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Ninja Gaiden Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

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

6/23/2005

Doku	
defeating	
up after d	
pick	
Kitetsu (
6	

Ninja Gaiden Cheats, Codes, Secrets, FAQs for Xbox (XB)

• Ninja Gaiden passwords

Password	A, Y,	X, X, R,	X, Y, B, R, L,	R, A, B,	A, Y, X,	Y, R, L,
Level	1	2	æ	4	5	9

• Ninja Gaiden 2 passwords

Password	Χ,	æ,	Z,	A, L, X, Y, Y, B	×	Υ,	<
Level	1	2	3	4	5	9	1

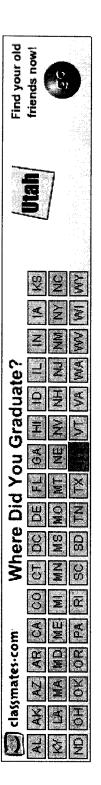
• Ninja Gaiden 3 passwords

Password	Y, R, L, X,	R, R, Y, A,	L, B, R, Y, L, Y	R, B, A, Y,	A, B, X, R,	X, X, A, X,	R, X, Y, Y,
Level	1	2	ю	4	5	9	7

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http://www.cheatcc.com/xb/ninjag.html

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X Ninja Gaiden

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. It is the same blue skirks 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

Exhibit C Page 156

Ninja Gaiden (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQue... Page 3 of 13 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.

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, a 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 sou 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 Ninjax of the clock and a treasure of the Ninjax of the clock 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 Ninjax of the clock and a treasure of the Ninjax of the clock that is across the street. Jump down, and enter the doorway across the street with the stairs. 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

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.

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.

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 90 Dabilahro, and has a very nowerful K i attack. This washer and 90 Dabilahro, and has a very nowerful K is attack. 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 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

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.

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

2,000 Essence each time. To replenish the bats, jump back to the save point and repeat. The hats will not hurt you enough to kill, and will randomly give you 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 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.

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 attacked 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 care 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 un your Lightning Ninpo to the maximum. Constantly run left or right. When he flaps his wings you will take a little block to defeat him try to level un your Lightning Ninpo to the maximum. Constantly run left or right. When he flaps his wings you will take a little block to defeat him try to level un your Lightning Ninpo to the maximum. Constantly run left or right. When he flaps his wings you will take a little block to defeat him try to level un your Lightning Ninpo to the maximum.

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 of 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

Ninja Gaiden (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, EverQue... Page 8 of 13 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

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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)

http://www.craveonline.com/games/cheats/xbox/cheat.php/Ninja+Gaiden

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, $\overline{2}$, or 3 Scarabs

Chapter 6

7. Monastery Annex

8. Underground Cemetery (upper area)

9. Suspension bridge room

Chapter 7

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10. Monks safe (second time)

Chapter 9

http://www.craveonline.com/games/cheats/xbox/cheat.php/Ninja+Gaiden

6/23/2005

- 11. Military Warehouse (break box on floor)
- 12. Military Base (bottom of stairs in control room)
 - 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

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Chapter 7

1. Suspension Bridge Room (throne)

http://www.craveonline.com/games/cheats/xbox/cheat.php/Ninja+Gaiden

5. Hayabusa Village (break door with hammer)

6. Pyramid (light altar with Fire Ninpo)

Chapter 2

Weapons

4. Ice Cavern (after defeating ice beast)

Chapter 13

2. Aqueduct 3 (take elevator down)

Chapter 10

3. Monks safe (3rd time)

Chapter 12

Chapter 11

Chapter 9

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

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

Chapter 8

Chapter 6

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

Chapter 4

6/23/2005

7. Dabilahro (received after 43 scarabs)

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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
6K, 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, B, X, L
6Y, L, R, A, Y, R

Ninja Gaiden 3 passwords

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LevelPassword

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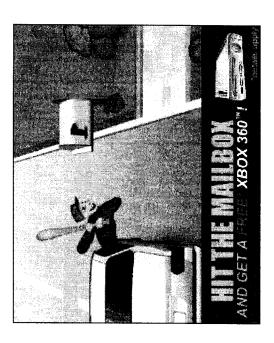
'eeGames.com

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ESTROY 10 SHIPS!

Tiger Woods PGA Tour 2004

(Last updated: October 27, 2003)





Strategy Guide

All golfers

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

All courses

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

Tiger Woods PGA Tour 2004 Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

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

• Play as Cedric The Entertainer

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

• Play as Dominic "The Don" Donatello

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

Play as Downtown Brown

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

Play as Edwin "Pops" Masterson

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

Play as Erica Ice

http://www.cheatcc.com/xb/twpgat2004.html

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

Play as Hamish "Mulligan" MeGregor

Tiger Woods PGA Tour 2004 Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

Play as Moa "Big Mo" Ta'a Vatu

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

Play as Natalie Gulbis

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

Play as Solita Lopez

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

Play as Sunday Tiger

Enter "4REDSHIRTS" as a case-sensitive password. If you entered the code correctly, Tiger Woods will say "Oh yeah!".

Play as Takeharu "Tsunami" Moto

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

Play as Val Summers

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

Play as "Yosh" Tanigawa

http://www.cheatcc.com/xb/twpgat2004.html

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

Target shootout

Tiger Woods PGA Tour 2004 Cheats, Codes, Secrets, FAQs for Xbox (XB)

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 the field. Make the first upgrades only after getting your first sponsorship. If you increase the percentages evenly tour, assuming that you have had enough practice, you will be at even (most likely better) skill then the rest of 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

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

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.



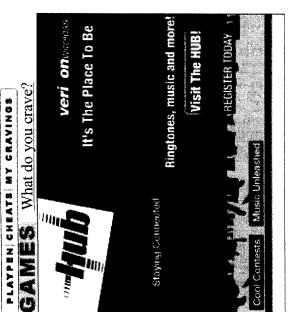
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Tiger Woods PGA Tour 2004 Cheats, Codes, Secrets, FAQs for Xbox (XB)

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Tiger Woods PGA Tour 2004 (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San A...

X Tiger Woods PGA Tour 2004

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



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Tiger Woods PGA Tour 2004 (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San A... Page 3 of 4

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

Play as Moa "Big Mo" Taa Vatu

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

Play as Natalie Gulbis

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

Play as Solita Lopez

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

Play as Sunday Tiger

Enter "4REDSHIRTS" as a case-sensitive password. If you entered the code correctly, Tiger Woods will say "Oh yeah!".

Play as Takeharu "Tsunami" Moto

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

Play as Val Summers

http://www.craveonline.com/games/cheats/xbox/cheat.php/Tiger+Woods+PGA+Tour+2004

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

Tiger Woods PGA Tour 2004 (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San A...

Play as "Yosh" Tanigawa

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 shootogo 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 (mostallikely 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 onlyb 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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EXHIBIT C

TAB 17

Web Page from www.craveonline.com Crave Infringing Web Pages

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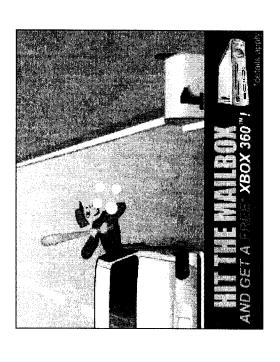
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i is better? Vote & Which next generation ree gift. ksrv.com

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Enter The Matrix

(Last updated: June 19, 2003)



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.

Enter The Matrix Cheats, Codes, Secrets, FAQs for Xbox (XB)

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 "FFFFFFFFI" as a code.

Taxi Driving

Enter "312MF451" as a code.

Multi-player fighting

Enter The Matrix Cheats, Codes, Secrets, FAQs for Xbox (XB)

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.):

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 Tunneld
DROP JDZMT10	B:\TOOLS	Weapon drop at 2nd Floor West (Chateau)
DROP ZKHBD10	B:\TOOLS	Weapon drop at Courtyard (Chateau)
DROP RHFTO10	B:\Tools	Weapon drop at Skyscraper

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DROP ZSZQH10	B:\TOOLS	Weapon drop at Warehouse (Chinatown)
DROP JDHQL10	B:\TOOLS	Weapon drop at Transformer Field (power plant)
DROP B1AXXF2	B:\TOOLS	Weapon drop at 2nd Floor PO Boxes
PLAY	B:\TOOLS	Play *.fmv files
TRACEKILL	B:\TOOLS	Kills traces
VIEW	B:\TOOLS	View *.img files
VIRTUAL	B:\TOOLS	Access 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:

DIR LOGOS: DIR V:

DIR RAM:

3 digit code 942 Passcode 8ram

DIAL.EXE

Passcode THISISNOTREAL Passcode FROZENFISH

Swordfight

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

Enter The Matrix Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

001-310-555-0111. You will get you a message from Trinity. She will give you a number. Select PORTKEY and nacking program and select "Save Progress". You can use the sword when you start that game file. It can be used "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 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 You now have access to the RAM drive. Go to DIR on your command list and access the RAM drive. A list of Select the DIAL command and dial 001-949-555-0101. You should get a message from Persephone. Next dial called CRACK on your command list. Open it, then type "8RAM". It should look like this: "CRACK 8RAM" in any stage, but will only appear when fighting enemies by pressing Punch + Kick. If you press Action when enter the number. She will start to talk to you. Type "NO" to both questions and she will give you a program folder names will appear. Open the TRINITY folder. Get the Training command on your DIR by typing 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"

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Note: The list of possible binary codes includes:

10100 10010 10011 10001 01001 00101 11000 11001 00011

Hack into The Matrix

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

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 For an easy way to unlock cheat mode, at title screen select "Hack". Press any key when instructed. Once the 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

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

Multi-player mode character selections

accompany these battles. Below is the list of backgrounds/environments that are used in the single player game 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 When entering multi-player mode, you do not get to choose which character(s) you would like to fight as. tself, and the characters the CPU will select upon choosing a certain background:

The Ballroom - Player 1: Niobe, Player 2: Ghost The Pit - Player 1: Seraph, Player 2: Ballard

The Bedroom - Player 1: Cujo, Player 2: Vlad

The Atrium - Player 1: Sewing Woman, Player 2: Janitor

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 multiplayer mode:

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

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 besides Axel. If one of those cheats are enabled, the bomb will blow up Axel and you will die, ending the game. does not kill you, but will knock you for a loop. For example, on the "Agent On Board" level, you start out

Alternate ending sequence

Enter The Matrix Cheats, Codes, Secrets, FAQs for Xbox (XB)

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 youwill lose. Turn around, grab all the guns you can, and take them out. If you get more than twenty, it unlocks fight. SWAT agents will start running from the back of the room in your area. If they get up to the 10 ft. mark, button and get ready. You will start out behind one of the tables and are told that you are caged in and have to other doors do not open. Once inside the "shooting range," you can participate in a test of skills. Press the red 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

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

Perfect accuracy

http://www.cheatcc.com/xb/etm.html

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

Dodging bullets

Enter The Matrix Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

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

Enter The Matrix Cheats, Codes, Secrets, FAQs for Xbox (XB)

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

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

Defeating Sephere

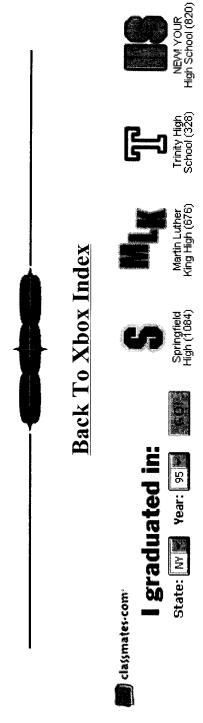
Let him strike first, and stay defensive. After this, lay it on him then back off and repeat.

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

powerful. Then, get out of there while still using Focus. When you are out of harms way, let off the Focus. Note: 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 Doing this in cramped spaces such as hallways is not recommended unless absolutely necessary.



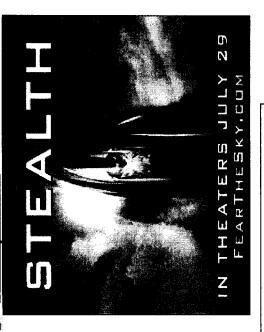
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Enter The Matrix (Xbox) - Xbox 360, PS3, Call of Duty 2, Killzone, Xbox Games, PS2 Games, Halo 2, Grand Theft Auto San Andreas, Ever... Page 1 of 10

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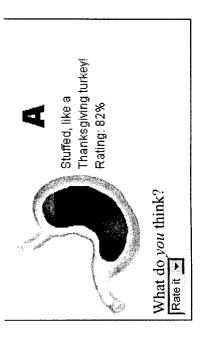


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Crave Raves

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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 2 of 10



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. Enter "0034AFFF" as a code. Maximum firepower Infinite ammunition

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Enter "1DDF2556" as a code.

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 3 of 10

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 "FFFFFF1" as a code.

Taxi Driving

Enter "312MF451" as a code.

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 withing).

CommandDirectoryResult

6/23/2005

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 Tunneld

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

FRACEKILLB: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: DIR LOGOS:

Passcode 8ram

DIR RAM: DIR V:

Exhibit C Page 198 3 digit code 942

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 "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 to the TOOLS from the B Drive, type all the EXE after them). For example, type "DECODE" then a space. DECODE will now appear in the command list. Repeat this for all files (without the LEXE after them). For example, type "Drive. Now, access VIRTUAL on your command list. To the command list. Repeat this for all personance 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 be taken back to the hacking screen. Look at the ton of the screen If it save "Solutions. Once you guess a correct image, the timer will be stoped and you will be taken back to the hacking screen. Look at the ton of the screen If it save "Solutions. Once you guess a correct image, the timer will be to the hacking screen. Look at the ton of the screen If it save "Solutions. Once you guess a correct image, the timer will be stoped to the hacking screen. Look at the ton of the screen If it save "Solutions. Once you guess a correct image is the part of the screen If it save "Solutions. Once you gues a correct image is the part of the screen If it save "Solutions. Once you gues a correct image is the part of the screen If it save "Solutions." amount of time to do this. Note: Click here to view boun time to do this. Note: Click here to view boun time to do this. Note: Click here to view boun time to do the screen. If it says "Solution: Blue", then the line will be traced and you will have to start back at 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 a ccessing 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.

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 all the commands there on your command list. Enter the MAIL command and type "THISISNOTREAL" as the password and type "YES". You wife and get the two commands there on your command list.

Filed 03/05/10

Exhibit C Page 199 001-949-555-0112 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 the 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 a 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 standard on your DIR by typing "TRAINING" then a space. Go to your command list and select TRAINING. On you command list, a file called 9 SWORD DSK will come in Salace in the book will come in the b

en 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 You can use the sword when you start that game file. It can be used in any stage, but will only appear wh

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".

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

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 and it will ask for a five digit binary code. Note: This code is random each time. Enter the correct code to accessly more options such as "DECODE.EXE", "PLAY.EXE", and "VIEW.EXE". Note: The list of possible binary codes includes:

11000
11000
11001
10010
10010
10010
100010
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00101

Hack into The Matrix

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 Hacker 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 Hacker Systems 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 vourself the "CHEAT EXE" is invaluable for those with free minds looking to further experiencing the rabbit hole for vourself the "CHEAT EXE" is invaluable for those with free minds looking to further experiencing the rabbit hole for vourself the "CHEAT EXE" is invaluable for those with free minds looking to further experiencing the rabbit hole for vourself the "CHEAT EXE" is invaluable for those with free minds looking to further experiencing the rabbit hole for vourself the "CHEAT EXE" is invaluable for those with free minds looking to further experiencing the rabbit hole for vourself the "CHEAT EXE" is invaluable for those with free minds and the contents of the looking to further experiencing the rabbit hole for vourself the "CHEAT EXE" is invaluable for those with free minds of the looking to further experiencing the looking to further experie 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 had won access. dual 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.

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 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 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

"HANDSHAKE EXE". When he asks what program you sent him, say "HANDSHAKE". Then, wait until he is done talking. He will then upload Multi-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 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 Atrium - Player 1: Sewing Woman, Player 2: Janitor The Ballroom - Player 1: Niobe, Player 2: Ghost The Bedroom - Player 1: Cujo, Player 2: Vlad The Pit - Player 1: Seraph, Player 2: Ballard

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 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 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 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

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

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 8 of 10 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 sequeling 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 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, youwill 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 neverending supply of SWAT. This a very good opportunity to harness your fighting skills and find new moves.

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 the 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 be 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 tryes

Running on walls

306

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

Game trailer

Powerade

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.

You may have trouble grabbing the flashlightm 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.

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 of 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. 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 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 your 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 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, 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, occause they can avoid all bullets, have shattering strength, and cannot be f

Exhibit C Page 203

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.

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. Attentive 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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Total Amount

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FROM FAEGRE & BENSON

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

05-CV-01186-RPM-BNB

SJS 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.)

I. (a) PLAINTIFFS DAVID ALLIS	SON, doing busi	ness as		DEFENDANTS CRAVE ONLI	NE MEDI	A. LLC A	Califo	rnia	limited
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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 1900 Fifteenth Street Boulder, Colorado 80302 Telephone: (303) 447-7700

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:

Cheat Code Central 4560 Augusta Drive Broomfield, Colorado 80020

SJS 44 (Rev. 11/04) Case 2:08-cv-00157-MHW-MRA Decument 64-6. Filed 03/05/10 Page 272 of 306

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.)

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Case 2:08-cv-00157-MHW-MRA Document 64-6 Filed 03/05/10 Page 273 of 306 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.

For a Nondramatic Literary Work
For a Nondramatic Literary Work

TX 6-162-180

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EFFECTIVE DATE OF REGISTRATION

Register of Copyrights, United States of America

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CONTINUATION SHEET FOR APPLICATION FORMS

- 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
- 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) if 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, cr 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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DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

Cheatcc.com website

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

NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S): (Give the name and address of at least one copyright claimant

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

as given in Space 4 of the basic form or Space 2 of any of the Short Forms PA, TX, or VA.)

A

identification of Application

David Allison, 4560 Augusta Drive, Broomfield, CO 80020

d	NAME OF AUTHOR ▼		DATES OF BIRTH AND DEATH Year Born▼ Year Died▼
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NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed. ▼

CONTINUATION SHEET FOR APPLICATION FORMS

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 Indicate which basic form you are continuing in the space in the upper right-hand corner
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 Space B is a continuation of Space 2 on the basic application.
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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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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.)

Cheatec.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.)

identification of Application

David Allison, 4560 Augusta Drive, Broomfield, CO 80020

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UNITED STATES DISTRICT COURT

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C.C. Number: SEE CC REC

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DO Code 4613

Sub Acct Type Tender 1:510000 N 4 2:086900 N 4

Amount 199.90 60.00

Total Amount

250.00

FROM FAEGRE & BENSON

 $86\mbox{-}\mbox{CV-}98$, Allison v Jupiter electric et al, 86

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 of 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.
- 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

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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 of 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.
- 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 FAEGRE & BENSON LLP 1900 Fifteenth Street Boulder, Colorado 80302 Tel. - (303) 447-7700 Fax - (303) 447-7800

E-mail – ddaley@faegre.com jbriant@faegre.com Attorneys for Plaintiff DAVID ALLISON Plaintiff's Address: Cheat Code Central 4560 Augusta Drive Broomfield, Colorado 80020