



1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
PHONE: 206.359.8000
FAX: 206.359.9000
www.perkinscoie.com

██████████
PHONE (206) 359-8098
FAX (206) 359-9098
EMAIL ██████████@perkinscoie.com

February 4, 2011

VIA EMAIL

Paolo Cirio
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Alessandro Ludovico
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Re: **Cease and Desist Abuse of Facebook**

Mr. Cirio and Mr. Ludovico:

We represent Facebook.

By your own admission, you used an automated bot, specifically designed to evade technical measures employed by Facebook to prevent such activity, to steal photographs and profile information from Facebook users. You then used this stolen information to create www.lovely-faces.com, a website you are actively promoting as "Face to Facebook," the third work in your Hacking Monopolism Trilogy, during which you previously launched similar attacks on Google and Amazon. You have also made the bot available online and are encouraging others to use it and the stolen information for other unauthorized and illegal purposes.

Your motivations, whether artistic, commercial, or otherwise, are irrelevant; your activities violate Facebook's Statement of Rights and Responsibilities and are illegal. Facebook demands that you immediately cease your activities and account for and purge all user content and data that you scraped, copied, or stole from Facebook or its users.

Facebook is committed to keeping its site and services a safe place for its users to interact and share information. As Facebook users, you are bound by the Statement, which prohibits:

- Collecting users' content or information, or otherwise accessing Facebook, using automated means (such as harvesting bots) without Facebook's permission;

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Perkins Coie LLP and Affiliates

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- Using Facebook to do anything unlawful, misleading, or malicious; and
- Facilitating or encouraging any violations of the Statement.

Collecting users' content or information, or otherwise accessing Facebook using automated means, without Facebook's express written permission is also prohibited by Facebook's Automated Data Collection Terms, available at [facebook.com/apps/site_scraping_tos_terms.php](https://www.facebook.com/apps/site_scraping_tos_terms.php).

So, under Section 14 of the Statement, Facebook has and will take technical steps to deactivate your Facebook accounts and block your access to Facebook's site, services, and network. This letter is also notice that Facebook revokes your authorization to access its site and services and prohibits you, your agents, employees, affiliates, or anyone acting on your behalf ("You") from accessing the Facebook site, services, network, or Platform for any reason whatsoever. Any further activity by You on Facebook's site, services, network, or Platform is unauthorized, and Facebook will enforce its Statement and protect its users against your unlawful activities.

Your activities also appear to be criminal and violate the California Comprehensive Computer Data Access and Fraud Act, Cal. Penal Code § 502(c); the U.S. federal Computer Fraud and Abuse Act, 18 U.S.C. § 1030; the E.U. Data Protection Directive; and E.U. Member State and other international and U.S. federal and state laws.

Please respond to me in writing before Monday February 7, 2011, confirming that You:

- Have stopped and will not again scrape, copy, collect, or obtain any Facebook or user data through automated or other means, from Facebook, its users, or its services;
- Have stopped and will not again use the Facebook site, services, network, or Platform to do anything unlawful, misleading, or malicious;
- Have delivered to Facebook and thereafter deleted and destroyed all data You scraped, copied, collected or otherwise obtained, through automated or other means, from Facebook, its users, or any of Facebook's services;
- Have taken down and destroyed any and all automated harvesting bots or code You used to scrape, copy, collect, or otherwise obtain Facebook's or its users' data;
- Have stopped and will not again facilitate or encourage Statement violations; and
- Have stopped and will not again access Facebook's site, services, network, or Platform for any reason whatsoever.

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With your written confirmation, please also provide the following information:

- A complete accounting of all Facebook user IDs or email addresses for Facebook profiles from which You scraped, copied, collected, or obtained any data.

This is a serious and urgent matter to Facebook and its users, and requires your prompt response. If you choose to ignore this letter and continue your current conduct, Facebook will evaluate its options and take all necessary measures to protect its users, enforce its rights, and protect its site, services, network, and Platform.

This letter does not relinquish or waive of any of Facebook's rights. Facebook specifically reserves all rights and remedies at law or equity, under applicable domestic and foreign laws.

Sincerely,

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