

KILPATRICK TOWNSEND & STOCKTON LLP

www.kilpatricktownsend.com

31 West 52nd Street 14th Floor New York, NY 10019 t 212 775 8700 f 212 775 8800

November 4, 2011

direct dial 212 775 8786 direct fax 212 775 8824 kgarris@kilpatricktownsend.com

VIA E-MAIL, FACSIMILE, and FEDERAL EXPRESS

jt.schmitt@verizon.net jschmittwde@yahoo.com

Fax: 202-588-9111

Mr. John Schmitt Ich Bin Ein New Yorker 2034 17th Street, NW Washington, DC 20009

Re:

Takedown Notice Pursuant to Section 512(c) of the Copyright Act:

NOAPPARENTMOTIVE.ORG

Dear Mr. Schmitt:

As you know from our 2010 correspondence to you and the then-current ISP for your web site at NOAPPARENTMOTIVE.ORG, we represent Citigroup Inc. and its affiliated entities (collectively, "Citigroup") in connection with intellectual property enforcement matters. We are writing once again with regard to the unauthorized posting and copying of at least one of our client's Citi Investment Research and Analysis research reports ("CIRA reports") on the web site located at NOAPPARENTMOTIVE.ORG.

As we stated previously, Citigroup is the exclusive owner of all copyright rights in the U.S. and throughout the world in and to its CIRA reports. Our client invested a significant amount of time and effort creating and developing its proprietary CIRA reports. As the owner of the above-described copyrights, Citigroup has, among other rights, the right to reproduce, distribute, and/or publicly display its CIRA reports, or to authorize the reproduction, distribution, and/or public display of such reports. The CIRA reports are offered and provided by Citigroup only through special relationships with clients, other institutions and authorized recipients, or pursuant to specific government regulations. Such access is specifically provided in concert with prohibitions on the unauthorized republication or copying on the Internet of the CIRA reports.

It has come to our client's attention that an exact and entire copy of at least one of Citigroup's proprietary CIRA reports has been posted and is being displayed on your web site at NOAPPARENTMOTIVE.ORG. This report, "Equity Strategy – Plutonomy: Buying Luxury,

NOAPPARENTMOTIVE.ORG November 4, 2011 Page 2 of 2

Explaining Global Imbalances," can be found at http://www.noapparentmotive.org/papers/citi plutonomy.pdf.

Citigroup has not authorized the posting or copying of any of its CIRA reports on the NOAPPARENTMOTIVE.ORG web site, nor has it allowed any other person or entity to do so. Consequently, the unauthorized copying and display of a full copy of the above-referenced Citigroup copyrighted CIRA report on the NOAPPARENTMOTIVE.ORG web site – which is readily accessible to, and seen by, consumers in the United States and throughout the world – infringes the intellectual property rights of Citigroup.

Based on the foregoing, and pursuant to Section 512(c) of the Copyright Act and other applicable laws, Citigroup hereby requests that you immediately cease displaying and permanently remove any and all CIRA research reports posted or copied on your web site at NOAPPARENTMOTIVE.ORG, including the report currently posted at http://www.noapparentmotive.org/papers/citi_plutonomy.pdf.

We ask that you provide us with written confirmation by no later than **November 11**, **2011** that you have complied with these demands.

I state that the information in this notification is accurate and, under penalty of perjury, that I am authorized to act on behalf of Citigroup, the owner of the exclusive rights in and to the above-referenced CIRA reports.

This letter is written without prejudice to Citigroup's rights and remedies, all of which are expressly reserved.

Sincerely,

Kristin Garris