FICTIONAL SAMPLE · DRAFTED BY FREE DEMAND WRITER FROM A MADE-UP CASE FILE · NOT LEGAL ADVICE

PLEASE VERIFY BEFORE SENDING

Unverified AI draft. Every fact must be checked against the records before use. It is not legal advice. Fill in every [ADD: …] placeholder, set the demand amount, confirm anything marked [VERIFY], and delete this box before sending.

- The federal registration number is not in the records. The proof-of-use page says it appears on a certificate copy "attached as page 3," but trademark_records.pdf has only 1 page. Also confirm the goods and services covered by the federal registration; the records list them only for the Kansas registration.
- Proof of use (first use, six cafes, 2014 domain cost, press coverage) comes from an owner-prepared summary dated March 12, 2026. Confirm these facts with the client. Confirm the 2014 cost of $12.99 is the right comparison to mention.
- The registrant is hidden behind Veilgate Privacy. The only identified person is "J. Corliss," who wrote in the March 4, 2026 email that he owns both domains. I did not name a company because the sources show only the email domain. Confirm the correct addressee, a mailing address if any, and the Veilgate forwarding address.
- The offer expired March 20, 2026. Check that against the letter date. Confirm the letter date and the response deadline, both left as placeholders.
- The customer complaints show harm to the client, but the records do not tie the text message to the registrant. The draft is worded to avoid asserting that link. Confirm whether to name the customer (the draft does not) and whether to describe the card charge as written.
- The reverse lookup of 47 domains (March 10, 2026) is summarized only. The list itself is not in the file. Consider attaching it, and confirm the lookup is accurate.
- [VERIFY] items: available remedies, Kansas law that may apply, and whether the UDRP process applies to these domains and this registrar.
- Per the firm notes, there is no money demand, so no demand amount appears. I added a record-preservation bullet to the demand list. Confirm you want it.

Halvorsen Teague LLC
[ADD: firm street address]
[ADD: city, state ZIP]
[ADD: phone] · [ADD: email]

[ADD: date]

VIA EMAIL to domains@harborlot-holdings.example [firm notes] and VIA the registrar's privacy forwarding address [ADD: Veilgate Privacy forwarding address] [firm notes]

Registrant of prairielantern-coffee.example and prairielanternroasters.example
c/o J. Corliss
domains@harborlot-holdings.example
[ADD: registrant mailing address, if known]

Re: Demand to Cease Use and Transfer Domain Names prairielantern-coffee.example and prairielanternroasters.example; Our Client: Prairie Lantern Coffee Roasters LLC; Mark: PRAIRIE LANTERN

Dear J. Corliss and Registrant:

Introduction

This firm represents Prairie Lantern Coffee Roasters LLC ("Prairie Lantern"), the owner of the PRAIRIE LANTERN mark [trademark_records.pdf p.1]. We write about two domain names: prairielantern-coffee.example and prairielanternroasters.example. Both were created on February 26, 2026 through the registrar Bluehaven Names Inc., and both list as registrant a privacy service, "Registrant Protected by Veilgate Privacy" [domain_records_and_screenshots.pdf p.1]. In a March 4, 2026 email sent from domains@harborlot-holdings.example, J. Corliss wrote to our client, "I own prairielantern-coffee and prairielanternroasters" [offer_email_and_customer_complaints.pdf p.1]. We therefore direct this letter to the registrant and to Mr. or Ms. Corliss.

Our client's mark

Prairie Lantern opened its first cafe under the PRAIRIE LANTERN name on May 3, 2014, and now operates six cafes in Kansas and western Missouri [trademark_records.pdf p.1]. The mark appears on its bags, cups, signs and delivery vans [trademark_records.pdf p.1]. Our client has sold coffee online through its website, prairielantern.example, since 2015 [trademark_records.pdf p.1].

Our client's rights are registered:

- Kansas state registration of PRAIRIE LANTERN, Certificate no. KS-TM-18-03316, issued by the Kansas Secretary of State on August 17, 2018, for roasted coffee beans, coffee shop and cafe services, and online retail store services featuring coffee. The registration lists May 3, 2014 as the date of first use [trademark_records.pdf p.1].
- Federal registration of PRAIRIE LANTERN in standard characters, registered November 5, 2019, Registration no. [ADD: federal registration number] [trademark_records.pdf p.1].

On February 24, 2026, our client publicly announced a franchise program, with the first franchise cafes planned for Oklahoma and Nebraska in 2027 [trademark_records.pdf p.1].

The domain names

Both domain names were created on February 26, 2026, two days after our client's franchise announcement [domain_records_and_screenshots.pdf p.1; trademark_records.pdf p.1]. Each

incorporates our client's PRAIRIE LANTERN mark in full. One adds "-coffee" and the other adds "roasters," terms that describe our client's goods and services [domain_records_and_screenshots.pdf p.1; trademark_records.pdf p.1].

prairielantern-coffee.example. The name servers are park1.adhaven-parking.example and park2.adhaven-parking.example [domain_records_and_screenshots.pdf p.1]. On March 9, 2026, the site displayed the banner "Prairie Lantern Coffee: Shop Coffee Deals." It also showed sponsored links for other coffee sellers, including "Ridgeway Roast Co. Coffee, 20% Off," "Best Kansas Coffee Subscription," and "Fresh Roasted Beans Delivered." The footer read, "This domain may be for sale. Inquire: domains@harborlot-holdings.example" [domain_records_and_screenshots.pdf p.1]. On March 8, 2026, a user wrote on our client's social media page that they went to prairielantern-coffee to order beans and found "just ads for other coffee companies" [offer_email_and_customer_complaints.pdf p.1].

prairielanternroasters.example. Mail server records for this domain are active [domain_records_and_screenshots.pdf p.1]. On March 9, 2026, the page was titled "Prairie Lantern Rewards, Claim Your Free $50 Gift Card." It used the Prairie Lantern lantern logo copied from our client's website. It also presented a form asking for name, email, phone, and "card number to cover $1.99 shipping" [domain_records_and_screenshots.pdf p.1]. Our client is not running a gift card promotion [offer_email_and_customer_complaints.pdf p.1]. Our client received the following communications:

- On March 6, 2026, a customer wrote that she had received a text about a free $50 Prairie Lantern gift card and entered her card number on the "rewards site" to pay shipping. She then found a $79.00 charge from a company she did not know, and she asked whether the site was our client's [offer_email_and_customer_complaints.pdf p.1].
- On March 7, 2026, the manager of our client's Flint Ridge cafe reported that two regular customers had asked about the gift card promotion that day [offer_email_and_customer_complaints.pdf p.1].

On March 11, 2026, our client posted a warning on its website and social pages that it has no rewards gift card promotion and that prairielanternroasters is not its site [offer_email_and_customer_complaints.pdf p.1].

Bad faith

The documents show the following facts, which we believe indicate bad faith:

- The domains were created on February 26, 2026, two days after our client's February 24, 2026 franchise announcement [domain_records_and_screenshots.pdf p.1; trademark_records.pdf p.1].
- On March 4, 2026, the registrant's email congratulated our client on "the franchise news," said the domains "would be perfect for your franchise sites," and offered both to our client for $18,500. The email said the offer was good until March 20, 2026 because "other buyers

are interested" [offer_email_and_customer_complaints.pdf p.1]. For context, our client paid $12.99 to register its own domain in 2014 [offer_email_and_customer_complaints.pdf p.1].

- The prairielantern-coffee.example site carries sponsored links to other coffee sellers and a notice that the domain may be for sale [domain_records_and_screenshots.pdf p.1].
- The prairielanternroasters.example site uses our client's logo and the PRAIRIE LANTERN name to solicit personal information and a card number for a gift card promotion our client does not offer [domain_records_and_screenshots.pdf p.1; offer_email_and_customer_complaints.pdf p.1].
- A reverse lookup of domains@harborlot-holdings.example, run March 10, 2026, lists 47 domains. These include names that combine other regional cafe and bakery brands with "-coffee" or "roasters" [domain_records_and_screenshots.pdf p.1].

Legal basis

The registration and use of these domain names may violate federal anti-cybersquatting law and federal and state trademark law, including our client's rights in its registered PRAIRIE LANTERN mark [VERIFY: available remedies] [VERIFY: Kansas law that may apply]. In addition, the domains may be subject to the Uniform Domain-Name Dispute-Resolution Policy (UDRP) process through the registrar [VERIFY: whether the UDRP applies to these domains and registrar]. Our client reserves all rights and remedies, whether or not mentioned in this letter.

Demand

On behalf of Prairie Lantern, we demand that you:

- Immediately stop using prairielantern-coffee.example and prairielanternroasters.example, including any page that uses the PRAIRIE LANTERN name or logo or collects personal or payment information.
- Do not sell, offer to sell, or transfer either domain name to anyone other than our client.
- Transfer both domain names to our client through the registrar, Bluehaven Names Inc. We will provide the transfer details on request.
- Preserve all records relating to the registration and use of both domains, including registration, hosting, and email records and any information collected through either site.
- Confirm in writing, by [ADD: response deadline], that you will comply with each of the above.

If we do not receive your written confirmation by that date, our client may pursue the remedies available to it without further notice.

Sincerely,

Bradley N. Halvorsen
Halvorsen Teague LLC