

RANDAZZA

LEGAL GROUP

Marc J. Randazza, JD, MAMC, LL.M.
Licensed in AZ, CA, FL, MA, NV

30 October 2024

Via Email Only

Jordan Barrington -- barrjetnyc@gmail.com

Re: Fuck you and your child molesting client

Dear Mr. Barrington:

I received your demand addressed to Advameg, Inc. seeking to take down information about your client from here: <https://www.city-data.com/so/so-New-York-New-York.html> I do not represent Advameg. I'm not sure how you came to send this demand to me, but man you should have thought *that one* through a little better.

Your client was convicted of engaging in oral/anal sexual conduct without consent. **The victim was a 13 year old boy.** One consequence of fucking a kid is that you get put on a sex offender registry, and that shit is public information.

You demanded the removal of your client's name, date of birth, and address "forthwith." Let me confirm that information, "forthwith"

Luke Thompson, 687 STONY HILL RD #3, Yardley, PA 19067: 13 Aug 1986

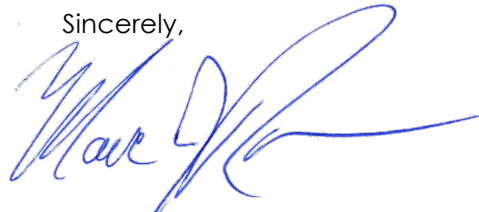
You threatened to complain to Google to try and de-list the website, to bring a civil suit, and to "*bring this matter to our contact at the New York AG's office.*" Oh, I'm so fucking scared. Not your CONTACT! Pussy.

You demanded that this information be deleted within 24 hours.

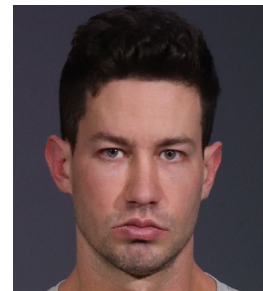
I have a suggestion for you. Why don't you go FUCK YOURSELF *forthwith* and tell your child molesting client to go fuck himself, and count himself lucky that he only got six years' probation, instead of the punishment he deserved.

I don't know what Advameg wants to do, but my guess is that they would tell you to go fuck yourself as well. And next time you are trying to suppress First Amendment protected information about a child molester, do some research on the motherfucker you're sending the demand to. Fuck you. Fuck your client. Better than him fucking little kids.

Sincerely,



Marc J. Randazza



**Luke Thompson
Child Molester
and
Censorious Asshat**

Encl: your demand and your client's registered sex offender details – what a creep

4974 South Rainbow Boulevard, Las Vegas, Nevada 89118

mjr@randazza.com | 888.887.1776

Advameg CEASE AND DESIST (Mr. Luke Thompson)

1 message

Jordan Barrington <barrjetnyc@gmail.com>
To: "mjr@randazza.com" <mjr@randazza.com>

Wed, Oct 30, 2024 at 5:59 PM

Dear Mr. Randazza,

Please confirm receipt of this email regarding **ADVAMEG INC.**

This is a **CEASE AND DESIST** demand to **ADVAMEG INC** to delete an entry from a webpage it controls:
<https://www.city-data.com/so/so-New-York-New-York.html> (the "Page")

Although that single Page contains listings of hundreds of individuals, specifically I am only seeking deletion of my client's mention on that Page (**Mr. Luke Thompson**), on the basis that Advameg's entire reproduction of the New York State Sex Offender Database is illegal pursuant to NYS Correction Law § 168-q(2).

NY COR § 168-q(2):

*"Any person who uses information disclosed pursuant to this section in violation of the law shall in addition to any other penalty or fine imposed, be subject to a fine of not less than five hundred dollars and not more than one thousand dollars. Unauthorized removal or **duplication of the subdirectory** from the offices of local, village or city police department shall be punishable by a fine not to exceed one thousand dollars. In addition, the attorney general, any district attorney, or any person aggrieved is authorized to bring a civil action in the appropriate court requesting preventive relief, including an application for a permanent or temporary injunction, restraining order, or other order against the person or group of persons responsible for such action. The foregoing remedies shall be independent of any other remedies or procedures that may be available to an aggrieved party under other provisions of law."*

To that end, please delete Mr. Thompson's name, address, and date of birth forthwith.

I have also attached an email from the New York State Office of Sex Offender Management, confirming that it is illegal to duplicate NYS's official SO database. Clearly, Advameg has obtained this directory of Sex Offenders from the State of New York's official website, since it contains a link to the official state database, with the link text "*Based on this official offender page*".

Upon information and belief, Advameg's City-Data.com contains information on 21,625 NY sex offenders. We believe that, if we must bring this matter to the attention of the NY AG's office, Advameg will be subject to a civil penalty of \$21,625,000, a \$1,000 civil penalty per individual in Advameg's database.

Consequently, please effectuate removal of my client from those databases within 24 hours, or if you fail to comply, we will complain to Google to get your entire site blocked from Google search results for containing illegal content, as well as filing a civil suit against your client, Advameg, and against Google Inc. We also intend to bring this matter to our contact at the New York AG's office, seeking full deletion of your entire database, and applicable civil penalties of \$21,625,000, if you fail to comply with this demand.

We have not yet contacted Google, or yet taken any actions to jeopardize your client's ability to display in Google search results.

We have not yet identified Advameg/City-Data to any agency of New York State government for enforcement.

Please confirm that the demanded deletion has occurred. I look forward to your prompt attention.

Very truly yours,
Jordan Barrington
Direct: (617) 604-4400

ATTACHMENTS:

1. Screenshot of database entry we seek to be deleted
2. Email from the State of New York, confirming that it is illegal to duplicate its SO directory

2 attachments



Offender Details

Anyone who uses this information to injure, harass or commit a criminal act against any person may be subject to criminal prosecution.

Domiciled



Additional Offender Photos

Offender Id	55831	Race	White
Last Name	THOMPSON	Ethnicity	Unknown
First Name	LUKE	Height	6' 02"
Middle Name		Weight	170
DOB	Aug. 13, 1986	Hair	Brown
Sex	Male	Eyes	Hazel
Risk Level	2	Corr. Lens	
Designation	No Designation Applies	Photo Date	April 16, 2019

Current Addresses

Type	RES (Primary)
County	New York
Address	515 W 38TH STREET APT 8B NEW YORK, New York 10018

Type	EMP (Primary)
County	
Address	687 STONY HILL RD #3 YARDLEY, Pennsylvania 19067

Law Enforcement Agency Having Jurisdiction [i](#)

NYCPD Sex Offender Unit

Current Conviction

Title	Section	Subsection	Class	Category	Counts	Description
PL	130.20	02	A	M	1	Sexual Misconduct: Engage In Oral/Anal Sexual Conduct Without Consent

Date of Crime	Jan. 15, 2019
Date Convicted	May 18, 2022
Victim Sex/Age	Male, 13 Years
Arresting Agency	NYCPD Sex Offender Unit
Offense Descriptions	Actual,Deviate Sexual Intercourse Actual,Sexual Contact Actual,Promoting/Possessing Sexual Performance by a Child
Relationship to Victim	Non-Stranger

Weapon Used	No weapon used
Force Used	None Reported
Computer Used	Yes
Pornography Involved	Yes
Sentence	Probation: 6 Year(s)

Previous Conviction(s) Requiring Registration [i](#)

None Reported

Supervising Agency Information [i](#)

New York County Probation Adult Supervision - 66

Special Conditions of Supervision [i](#)

Comply with probation restrictions; Order of protection; Comply with the Sex Offender Registration Act

Maximum Expiration Date/Post Release Supervision Date of Sentence:

April 25, 2029

This date was reported at the time of the offender' s current registration. The date and any special conditions listed may be subject to change while the offender is under supervision.

Scars, Marks & Tattoos

None Reported

Additional Names/Aliases

None Reported

Current Vehicles

None Reported