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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	85310960
Applicant	Erik Brunetti
Applied for Mark	FUCT
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Date	05/02/2014

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application of

ERIK BRUNETTI

Serial No. 85/310960

Appeal Filed: July 27, 2013

Trademark: FUCT

Trademark Examining Attorney:

Zachary R. Bello

Law Office 111

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**EX PARTE APPEAL**

**APPLICANT'S REPLY BRIEF**

In the matter of the petition for review of the final refusal of:

Applicant's Mark: FUCT

Application No. 85/310960

Applicant's Goods: Athletic apparel, namely, shirts, pants, jackets, footwear, hats and caps; Children's and infant's apparel, namely, jumpers, overall sleepwear, pajamas, rompers and one-piece garments.

International Class: 25

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## **I. INTRODUCTION**

In summary, the Examiner's brief ignores most of the points made in the Applicant's brief.

While the Examiner shows that "fuck" and "fucked" may be vulgar, neither is the mark in question. The evidence that the mark FUCT is vulgar is woefully thin. It was only after two office actions, acceptance of an amendment to allege use, and then after the withdrawal from publication, two further office actions and a refusal of reconsideration, was the Examiner finally able to find a dictionary that he contends shows that FUCT sounds the same as "fucked" and therefore FUCT is vulgar. If it was that difficult for the Examiner to find such evidence, we can safely assume that an average consumer, who does not take days searching dictionaries before buying clothes, will not find and rely on the Macmillan Dictionary and decide to be offended.

But most importantly, in 22 years only one person (and that many years ago) was offended. The actual evidence of consumer perception is unrebutted and irrefutable.

The mark FUCT should be approved for publication.

## **II. ARGUMENT**

### **A. The Examiner Failed to Address Applicant's Arguments**

It is clear that one letter makes a big difference. The Examiner did not respond to this at all.

How can the Office justify registering FCUK (e.g., Reg. 4,167,152 which did not even get a preliminary 2(a) refusal) which is immediately obvious as "fuck" (see e.g., FCUK YOU MEAN, S/N 85/627543) but refuse to approve FUCT, which Applicant believes it has proved is not immediately recognizable as "fuck" or "fucked"?

The Examiner did not address the existence of extremely strong actual evidence of FUCT

not being objectionable. That FUCT products are sold at good retailers in classy shopping areas (i.e., not in a red-light district). The evidence of 22 years of use is not rebutted or otherwise challenged. The fact of one objection in all those years, especially when so long ago, emphasizes that the other 313 million Americans do not find FUCT objectionable.<sup>1</sup>

Dictionaries are only secondary evidence. So dictionaries should never be able to overcome clear evidence that the mark is not objectionable.

The Examiner does not address the fact that FUCT is arbitrary and coined. The Examiner does not address the fact that if the Urban Dictionary is considered, it actually shows that FUCT is understood to be a brand name, not a sexual reference.

The Examiner does not address the principle that if there is more than one meaning (assuming for argument there is sufficient evidence to support his contention that FUCT would be understood to be “fucked”). Certainly FUCT is not “clearly limited to [a] vulgar meaning.”

The Examiner cites the case law holding that “vulgar” is sufficient grounds for refusal under Section 2(a) but does not address the reasoned argument that over the years, “vulgar” has been improperly accreted to the statutory language. So if the Board is not convinced by the above arguments, then the Board must, as the Supreme Court has made clear, apply the plain language of the statute (not the non-statutory accretion of “vulgar”) and refuse approval only if “scandalous.” The Examiner does not argue that FUCT is scandalous.

The Examiner does cite the case law that holds Section 2(a) constitutional. However, he does not address the reasons why such case law is no longer valid. The “government gets to choose what to spend its money on” was a weak reed when adopted. That reed broke when the

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1: The fact that consumers do object to products they find objectionable hardly needs to be proved, but two recent examples involving national retailers illustrate this. See Orange County Register, “Pac Sun, Utah mom duel over T-shirts, February 19, 2014, page 1; Orange County Register, “Parents Get Tilly’s To Pull Pot-Theme Clothing,” March 14, 2014, pages 1,6.”

Office became self-supporting. Furthermore, the First Amendment jurisprudence has considerably evolved in the interim so Applicant does not believe (consistent with other commentators) that Section 2(a) is simply unconstitutional.

As to the failure to raise the constitutional issue during examination, the Examiner did not need to put any additional facts needed in the record. Certainly, the Examiner was not prejudiced since he did not need put any facts in the record and he was able to argue the law (to the same extent he argued other issues). So the Board is requested to consider this issue. While the Board might not have the authority to find Section 2(a) as unconstitutional, e.g., Panola Land Buyers Ass'n v. Shuman, 762 F.2d 1550 (11<sup>th</sup> Cir. 1985), the issue is still important, and the Board can apply the statute in a manner to avoid the constitutional question, and approve the mark for publication.

**B. Examiner's Arguments Do Not Justify the Refusal to Approve for Publication**

The Examiner has a difficult role. He approved the mark for publication, obviously feeling that the mark was not "vulgar," but it was withdrawn from publication presumably because someone, probably someone older with an old-fashion sense of what is proper, disagreed with the Examiner. The fact that other applicants for FUCT, in prior years, have abandoned their applications has no significance (especially since it is doubtful that they were bona fide users since it the Applicant that has been using the mark for 22 years).

The Examiner cites the rule that when a substantial portion of the general public (although not necessarily a majority) would consider the mark to be scandalous. But he has no any evidence on the critical point of whether FUCT is scandalous (as distinguished from "fuck" or "fucked"). The best he can is cite on dictionary for the proposition that FUCT is vulgar: the Macmillan Dictionary which says that "fucked" is pronounced "fʌct." How many consumers of

FUCT are going to find the Macmillan Dictionary to see how to pronounce “fucked,” and know what Λ means, and make a connection to FUCT and be offended. I applaud the Examiner’s diligence but this is absolutely improbable.<sup>2</sup>

But even assuming for argument that there is a similarity in sound, FUCT has a different appearance than “fucked” and a different meaning than “fucked,” as discussed in Applicant’s opening brief. Considering the record of only one objection in 22 years, against the asserted similarity in sound (assuming the public gets it) and the difference in appearance and meaning, shows that this is a very weak argument by the Examiner.

The Examiner implicitly asserts that if a mark is similar to a word believed to be vulgar, then the mark is vulgar. Not so. Consumers can discriminate between marks with spellings very similar to vulgar words, compare the registered FCUK mark with “fuck.” The evidence shows they can. Ordinary words can become vulgar, e.g. “cherry.” There is no reason why words that might be vulgar can become non-vulgar. If the Examiner is correct that the Urban Dictionary should be considered, then it is proof that FUCT has a non-vulgar meaning as a brand name. Marks can become generic, and, rarely, trademarks again. There is no reason why the same transmutation cannot happen with words that might once have been vulgar.

The Examiner argues that a few items of Applicant’s clothing show that FUCT is vulgar. Edgy youth brands have t-shirts that refer to violence, sex and drugs. Yes, Applicant is an edgy youth brand, and a few of its many styles have references to violence, sex and drugs. But the Examiner was able to find only a small number of such references (whatever the exact percentage is, it is relatively small). But this proves nothing. In fact, it disproves the Examiner’s

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2: It is a bit unfair to allow the Examiner’s case to be based upon the one dictionary that was never put into the record. So it would be appropriate for the Board to disregard it. And if the Board feels that it has to treat the parties equally, it can disregard the exhibit Appellant submitted with its opening brief.

argument because if he is correct, then FUCT must also refer to drugs and FUCT must also refer to violence, and patently neither is true. Furthermore, even mass market brands make references to violence, sex and drugs (and occasionally the public objects) so that does not mean anything. That does not convert their brands into vulgar marks.

The Examiner does not establish, and cannot establish that a significant portion of Applicant's styles refer to sex. But that would not even be relevant. The Examiner would have to prove that the way FUCT is used on products, the public would understand that the trademark refers to refer to sexual intercourse, i.e. "fuck." Even if a few of Applicant's products refer to scantily clad women, that doesn't mean sexual intercourse. So Applicant contends that none of its styles suggest to consumers that FUCT means "fucked." And if reasonable minds differ about a few styles, still the number of such styles is very small and the connection between FUCT and "fucked" is very tenuous.

### **III. CONCLUSION**

The Examiner is doing the job he was told to do the best he can, so no criticism of him personally is intended. But as discussed above, even the Examiner knows this mark should be approved for publication and he did so. He is making the arguments he has to make. But he simply cannot respond to many of the reasons why this mark should be approved for publication. When comparing the 22 years of actual evidence, as opposed to the tenuous proof from one dictionary, found late in the proceeding that allegedly shows similarity in sound only, Applicant

believes that the actual evidence of consumer perceptions is so overwhelming that this mark should be approved for publication.

Dated this 2nd day of May, 2014.

/s/ John R. Sommer

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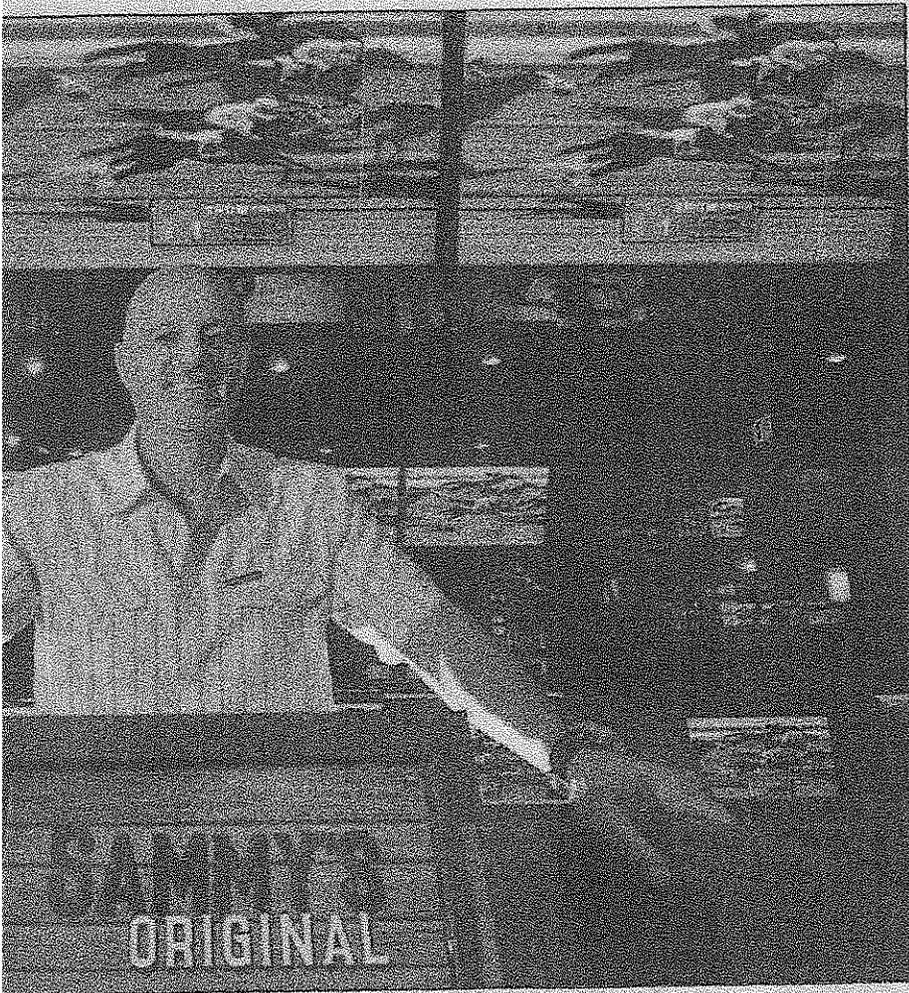
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Attorney for Applicant  
ERIK BRUNETTI

# BUSINESS

DE IN O.C.

**STATUS UPDATE:** The Village at Orange will see upgrades and possibly new anchors. **Page 2**



PHOTOS: STEVEN GEORGES, CONTRIBUTING PHOTOGRAPHER

s Original sports bar in Lake Forest. Sammy's will feature horse race wagering on itos and Santa Anita.

# B, WITH A SIDE OF FECTA

venue for off-track horse wagering in a bar or eatery.

## PacSun, Utah mom duel over T-shirts

Anaheim company stands behind designs featuring scantily clad women.

BY JENNIFER WANG  
STAFF WRITER

Anaheim-based PacSun and an outraged woman in Orem, Utah, are going to have to agree to disagree over fashion sense for teens.

Judy Cox and her 18-year-old son were shopping Saturday at the University Mall in Orem, about 40 miles south of Salt Lake City, when she saw "indecent" T-shirts for sale at the PacSun store. The shirts featured pictures of scantily dressed models in provocative poses.

Cox said she complained about the window display to a store manager and was told the T-shirts couldn't be taken down without approval from the corporate office. So Cox bought all 19 shirts in stock, for a total of \$567. She says she plans to return them later, toward the end of the chain store's 60-day return period.

"These shirts clearly cross a boundary that is continually being pushed on our children in images on the Internet, television and when our families shop in the mall," Cox said in an email to The Associated Press.

PacSun wasn't backing down Tuesday. According to Chief Executive Gary Schoenfeld, the company will continue to carry a variety of brands - including ones

rack or another satellite wagering facility unless the existing location grants a waiver. Wagering areas are restricted to adults 21 and older.

os - all served with scratch de sauces and dressings. Enes include American Kobe gers, salads, sandwiches and aks. Prices range from \$8 to . Sammy's plans to offer hap-hour menus from 3 to 6 p.m. nday through Friday and from p.m. to 1 a.m. Sunday through arsd.

"At the end of the day, we want d that puts a smile on your e," Monson said.

OC Tavern owner Michael rrigan said he's happy to have ther horse wagering bar in region because it's good for industry. Like Sammy's, OC vern, earns 2 percent of the ney wagered.

"I have seen great success and wth in my business because of ering off-track betting," he d.

Sammy's, at 23221 Lake Center ive, opens 9:30 a.m. today and restricted to adults 21 and ler.

Wagering can be placed from es in Santa Anita Park, Phila-phia Park, Golden Gate Fields Berkeley, Aqueduct in New rk, Gulfstream Park and Tam-Bay Downs in Florida, Fair ounds Race Course in New Orns and Oaklawn Racing in Arnsas. Friday, Saturday and nday nights feature quarter rse races from Los Alamitos d harness racing from Sacra-mento.

**CONTACT THE WRITER:**  
nluna@ocregister.com

# T-SHIRTS

FROM PAGE 1

that may be deemed provocative. "While customer feedback is important to us, we remain committed to the selection of brands and apparel available in our stores," he said in a statement to the Register.

Schoenfeld said PacSun takes pride in its products, which are inspired from a variety of influences including music, art, fashion and action sports.

"The result is a creative and diverse expression both in product and marketing," he said.

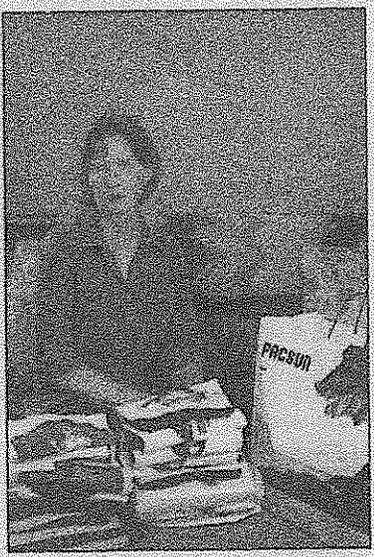
The reaction from Orem - a city of about 90,000 in Utah County that uses the motto "Family City USA" - doesn't surprise industry analysts.

"This is something we've seen in the past with teen brands like Urban Outfitters and Abercrombie & Fitch," said Betty Chen, an analyst with Mizuho Securities. "Once in a while, they run into this reaction... but I don't think it was anything overtly intentional."

Chen added the Utah incident was unlikely to have an impact on the company's performance, which is gaining traction because of a broader product strategy that involves carrying popular brands like Brandy Melville as well as private labels.

PacSun's attempt to offer an edgier and more provocative selection is likely an effort to attract tougher-to-please teenagers, who are spending their money elsewhere.

"Teens are experiencing gen-



MARK JOHNSTON, AP

**Judy Cox purchased the entire stock of 19 T-shirts for \$567 from the PacSun store in Orem, Utah, saying the display violated the city's decency code.**

eral spending fatigue across key categories, specifically fashion-related items," noted Steph Wis-sink, a senior analyst at Piper Jaffray, in a recent survey on teen spending.

The once-darling "triple A's" of the teen apparel market - American Eagle Outfitters, Abercrombie & Fitch and Aeropostale - have been plagued in recent months by plummeting sales and changes in leadership.

American Eagle CEO Robert Hanson unexpectedly quit in January; a few days later, Abercrombie stripped its CEO Mike Jeffries of his board chairmanship. Both presided over company stock values that fell by double digits last year. Aeropostale has reported losses for four straight quarters.

Cox said she wants her actions to make clear that the types of images portrayed on the PacSun shirts are not acceptable for public display. She said she plans to meet with Orem's city attorney to discuss whether the images on the T-shirts violate city code.

"I hope my efforts will inspire others to speak up within their communities," Cox said in an email. "You don't have to purchase \$600 worth of T-shirts, but you can express your concerns to businesses and corporations who promote the display of pornography to children."

Orem's city code prohibits anyone from putting "explicit sexual material" on public display. The city defines that as "any material that appeals to a prurient interest in sex and depicts nudity, actual or simulated sexual conduct, sexual excitement, or sadomasochistic abuse."

The Orem city attorney wasn't immediately available for comment.

Longtime mall manager Rob Kallas said the display is down now because Cox bought all the shirts.

Kallas said this is the first time he's received complaints about PacSun, but in the past others have complained about images in the windows of Victoria's Secret. That's led to Orem city attorneys at least once to ask the store to remove an image, he said.

PacSun's stock prices were up 3.75 percent when the markets closed on Tuesday. The company has 600 stores across the U.S.

The Associated Press contributed to this report.

## ly Asked Questions Mortgage



### About Ron Siegel

Ron Siegel is a syndicated Radio Host in California discussing the roof over your head, your bank account and other items of interest. Ron is a specialist in Mortgages and Home Financial Planning. He has helped First Time Home Buyers, Move Up Buyers, and Right Sizing buyers finance and Refinance with FHA, VA, Conventional, Jumbo, Reverse Loans and non-Traditional Loans.

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3 How much money can I get?

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# LOCAL



FILE PHOTOS

Ill. Cook, Elisandro "Alex" Diaz, Louis Guazada, Peter Katz, Brian Chuchua, Zeke Hernandez and Richard Ramirez are part of a group of county veterans who are advocating for a veterans cemetery in the Orange County Great Park.

## SOLUTION FOR VETERANS CEMETERY IN GREAT PARK BRINGS OPTIMISM

A vote, Irvine council says it will form committee to examine 100 acres on site.

County doesn't have a single cemetery specifically for veterans. Af-

Number of vets in parts of Southern



## Former politician says wife is abuser

Norby faces allegations of domestic violence, child endangerment.

BY MARTIN WISCKOL and CLAUDIA KOERNER STAFF WRITERS

FULLERTON • Former Assemblyman Chris Norby, arrested on suspicion of domestic violence at his Fullerton home Wednesday, said his wife, Martha, was the abusive one — but she dismissed the allegation and said his abuse occurred since they wed in 2009.

Fullerton police declined to discuss details of the incident other than to say they responded to a complaint and that Martha Norby had no injuries. Orange County Supervisor Shawn Nelson, a longtime friend of Chris Norby who



Chris Norby

picked him up from jail, said he saw the police report, in which Martha Norby said her husband

pushed her. "She has severe anger issues," Norby said of his wife Thursday. "There's a pattern of abuse, all one-sided."

...this week to support an Assembly bill that calls for a state veterans cemetery in Orange County and to consider offering 100 acres at the Great Park for a site.

Consider is the key word, though. While supporters of the efforts - among them, those wearing medallions, patches on their vests section of military uniforms - the City Hall late Tuesday as if a deed to the land, approval

345,058  
Los Angeles County  
139,000  
Riverside County  
136,611  
Orange County  
100,816  
San Bernardino County  
45,745  
Kern County  
6,631  
Imperial County

Source: U.S. Census Bureau American Community Survey 2008-2012



A group of local veterans wants a veterans cemetery in the Great Park, once the site of the El Toro Marine Corps Air Station.

or it. I'm the victim. I've never laid a finger on her."

Martha Norby disputed her husband's claim in an interview on her front porch. She said Chris Norby was "controlling" and "gets angry very quickly."

"I've had too much trauma in my life because of him," said Martha Norby, a Honduran native who became a U.S. citizen last year.

Police responded to a

SEE NORBY • PAGE 5

CEMETERY • PAGE 4

## Transgender student inspires at pageant

Chapman University became the center of contention at the school's annual all-girls pageant Wednesday night, winning the title of Miss Congeniality.



ANA VENEGAS, STAFF PHOTOGRAPHER

Addie Vincent, 21, faced off against 15 titlers for the Delta Queen, a organization by Greek system. The fact that she was so awed after the fact that she was to compete

Addie Vincent, second from left, is named Miss Congeniality in an all-girls pageant at Chapman University.

was so amazing on its own." The pageant's winner was senior Alexandria Kessinger. Throughout the contest, many of the 500 students and audience members whooped and hollered every time Vincent took the stage at Memorial Hall.

For the talent competition, Vincent recited an original poem called "The Look," which chronicled the stares and stereotypes transgender individuals experience daily. In the poem, Vincent encouraged compassion and understanding for those who don't fit traditional gender roles.

Following the poem, students shouted, "We love you, Addie!" and gave Vincent the night's only standing ovation.

"Addie has inspired so many people," said Lauren Chouinard, a friend and former pageant contestant. "Addie sent a message so many people needed to

SEE PAGEANT • PAGE 5



TILLYS.COM

This marijuana-leaf body suit made by Los Angeles-based clothing line See You Monday was sold at Tilly's until parents successfully campaigned the Irvine-based retailer to have such clothing pulled.

## PARENTS GET TILLY'S TO PULL POT-THEME CLOTHING

Parents of Edison High School students in Huntington Beach succeeded in their quest to have the local Tilly's store remove apparel featuring images of marijuana leaves. Their group, Youth Matters, wrote letters to Tilly's complaining about the clothing.

STORY ON LOCAL 6

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# After parents speak up, Tilly's uproots marijuana-leaf clothing

### Huntington group fearing 'desensitization' lobbied store to pull the items.

HUNTINGTON BEACH • Clothing featuring images of marijuana leaves has been pulled from the shelves at



TILLYS.COM

Clothing and accessories featuring images of marijuana leaves has been pulled from the shelves of Irvine-based retailer Tilly's after a successful campaign by parents.



LAUREN STEUSSY  
STAFF WRITER

Irvine-based retailer Tilly's after parents campaigned to keep the leggings, belts, swim-suits and other garb from getting in the

way drug for teens, often leading to heavier drug use such as prescription medications and heroin, said Shelley Skaggs, a Youth Matters member who also directs outreach and admissions at the transitional living home Benchmark Transition.

children," Green said. "So we thought that was great."

Los Angeles-based clothing line See You Monday is sold at retail clothing stores popular among teens such as Tilly's and Zumiez. Skaggs said she's also seen clothing with marijuana images at the clothing store Active Rider Shop. Green is reaching out to the company to remove the clothes from those stores as well.

hands of teens.

The parent group Youth Matters, a subcommittee of Edison High School's Parent Teacher and Student Association, became aware of the images in February at the Huntington Beach Tilly's. Youth Matters organizes education and outreach for Huntington Beach to prevent drug and alcohol use among teens.

"Teens usually smoke marijuana for two reasons: to fit in socially or as a way of self-medicating," Skaggs explained, adding that making marijuana fashionable will give young students the impression that they can fit in socially by participating in that culture.

But Green said the issue stretches further than a clothing retailer.

"It's not just Tilly's," she said. "It's a pervasive drug culture. So we just keep writing letters and educating the community."

A PTSA parent was shopping for her child and noticed some of the items from the clothing line See You Monday, which prominently featured colorful marijuana leaves, some times against a backdrop of psychedelic splashes. The parent who spotted the clothing notified other members of Youth Matters, and the group launched a letter-writing campaign.

About a dozen parents in Youth Matters wrote to the company, asking it to remove the images of pot from its Huntington Beach location. To the parents' surprise, the response from Tilly's was positive and almost immediate, Green said. She received letters from Tilly's saying it agreed with the cause and the other parents were fighting for and would not sell the clothing at the Huntington Beach Tilly's. The company also suggested that its foundation, Tilly's Life Center, could perhaps sponsor Youth Matters events.

Green visited the store in Huntington Beach and said that the marijuana clothes had already been pulled from the shelves, though the store's manager said she could not confirm that. A representative from Tilly's Irvine headquarters declined to comment on the clothing and whether it would be removed from locations outside of Huntington Beach.

"It's really a desensitization thing, as clichéd as that sounds," said Youth Matters Chairwoman Kim Green. "Our average age of youth starting drugs or alcohol is 12 years old."

Tilly's Life Center is the opposite of what the stores were selling, but totally in line with what the PTSA does, which is advocate for

As of Thursday, the items with marijuana leaves could no longer be found on the clothing company's website.

CONTACT THE WRITER:  
714-796-2227 or  
lsteussy@oregister.com

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