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March 10, 2010

<u>VIA CERTIFIED MAIL</u> 7008 1830 0004 1989 1900 and REGULAR U. S. MAIL

Mike McCabe
Executive Director
Wisconsin Democracy Campaign
210 North Bassett Street, Ste 215
Madison, WI 53703

Re: Infringement of U.S. Trademark Nos. 1,877,094 and/or 1,809,741

Dear Mr. McCabe:

It recently came to our attention that your organization launched a campaign, which it or you have entitled "Citizens United Against Citizens United." We are aware of that campaign and you are utilizing at least online posts and an online petition on your website (posted in January 2010), and a Facebook page seeking members to join, which you are listed as having personally created. This page lists over 1300 members. All of these infringe our client Citizens United's United States Trademark Nos. 1,877,094 and/or 1,809,741. Your use of Citizen United's trademarks is clearly not authorized.

Your unauthorized use of Citizens United's trademarks creates a likelihood of confusion, mistake and/or deception as to the origin and/or source of your campaign; and/or that your campaign is somehow originated by, affiliated or associated with, connected to and/or approved by Citizens United — which it is not. Your unauthorized use infringes Citizen United's trademarks within the meaning of 15 U.S.C. §1114, and falsely designates origin of and/or dilutes Citizen United's trademarks within the meaning of 15 U.S.C. §1125.

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We demand that you and Wisconsin Democracy Campaign immediately cease all use of Citizens United's trademarks, destroy all writings and/or other articles bearing a Citizen United trademark pursuant to 15 U.S.C. §1118, and send us written confirmation that you have done so by March 19, 2010. Should you have any questions, please contact either Katie Horvath (231.932.7389) or me (804.775.6809).

Sincerely,

Ŵyatt В. Durrette, Jr.

WBD/scl

cc: Katherine F. Horvath