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January 7, 2016

VIA EMAIL

Daniel McCall
Liberty Maniacs
100 5th Ave S
Sauk Rapids, MN 56379
sales@libertymaniacs.com

Re: **NOTICE OF INFRINGEMENT - IMMEDIATE ATTENTION REQUIRED**

Dear Mr. McCall:

This firm serves as legal counsel to Bernie 2016, Inc., the official organization of the campaign for Bernie Sanders' 2016 US presidential campaign. As you likely know, Bernie 2016, Inc. owns and holds all



trademark and copyright rights in the logos (collectively, the "Official Logos") and has invested considerable resources in developing recognition and goodwill for both its name and the Official Logos.

It recently came to our attention that Liberty Maniacs has been offering merchandise that uses the Official Logos at the <http://libertymaniacs.com/products/bernie-is-my-comrade-coffee-mug>, <http://libertymaniacs.com/products/bernie-sanders-is-my-comrade-tees>, and <http://libertymaniacs.com/products/bernie-sanders-is-my-comrade-hoodie-sweatshirt>, as well as on market places such as RedBubble: <http://www.redbubble.com/people/libertymaniacs/works/17410224-bernie-sanders-is-my-comrade>.

Section 43(a) of the Lanham Act (15 U.S.C. § 1125) prohibits use in commerce of "any word, term, name, symbol or device . . . which is likely to cause confusion, or to cause mistake, or to deceive as to the origin, sponsorship or approval of his or her goods, services, or commercial activities by another person." Your use of the Official Logos is likely to cause exactly such confusion. Additionally, by using the distinctive logo of Bernie 2016, Inc., Liberty Maniacs has violated the U.S. Copyright Act (17 U.S.C. § 501) and is liable for falsely applying the Bernie 2016, Inc. name and logo to Liberty Maniacs' products. 17 U.S.C. § 1202. This list of Liberty Maniacs' unlawful conduct is not exhaustive.

As an intellectual property owner, our client is obligated to take steps to protect its trademark and copyright rights and to protect the good will built up in its name and brand. Therefore, please confirm, within five (5) days of the date of this letter, that you have complied with the following:

1. Cease and desist from any and all use, reproduction, and/or display of the Official Logos or any similar, related, or confusing mark in any packaging, label, advertisement, signage, ad copy, domain name or extension, or the like; and
2. Destroy and/or take offline all materials, packaging, labels, advertisements, signage, ad copy, or the like to which the Official Logos or any deceptively or confusingly similar mark or proprietary content has been applied.

Due to of strict campaign rules and regulations, and other legal restrictions that apply to the use of the Official Logos, we must ask you not to use the Official Logos on any of your merchandise, and especially not on merchandise that you plan to sell. We encourage you to be creative in designing and using your own logos or trademarks to clearly identify you as the source of the efforts. Hopefully you see this as an opportunity to creatively and distinctively come up with something new and clever on your own.

Although we are confident that the issues raised in this letter can be simply and swiftly resolved, we are obliged to note that Bernie 2016, Inc., reserves all rights, claims, defenses, remedies, and contentions that it may have in connection with the subject matter of this letter. This letter is not a full recitation of all relevant matters, and nothing omitted and/or contained herein shall be construed as or deemed to be an admission or a waiver by Bernie 2016, Inc.

The campaign appreciates your cooperation to prevent confusion; your assistance our prompt attention is both appreciated and expected.

Sincerely,

GARVEY SCHUBERT BARER



By

Claire F. Hawkins

CFH:cw