

A LEGAL PROFESSIONAL ASSOCIATION

WWW.TDDLAW.COM

DAVID E. LOWE
DALE H. MARKOWITZ
JOSEPH R. ZNIDARSIC
DAVID M. ONDREY
HEIDI M. CISAN
TODD C. HICKS*
MATTHEW J. DOLAN
L JAREDD FLYNN

EZIO A. LISTATI
KELLY A. SLATTERY
JOHN R. LIBER, II**
JAMES P. VITALE
GINA M. BEVACK-CIANI
LAURA M. WELLEN
DANIEL T. CRONIN
CHRISTIAN J. ONDREY

OF COUNSEL:
NANCY H. BURROUGHS
BRANDON D. R. DYNES
THOMAS L. COLALUCA**
MARY JANE TRAPP

*ALSO ADMITTED IN NEW YORK

**ALSO ADMITTED IN FLORIDA

RAY K. THRASHER (1906-1973) JAMES W. DINSMORE (1916-1975) LAWRENCE J. DOLAN (RETIRED)

WRITER'S EMAIL: DOndrey@tddlaw.com

November 5, 2014 CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Sierra Club 131 N. High Street, Suite 605 Columbus, Ohio 43215 Ms. Kathy Hanratty 9059 Auburn Road Chardon, Ohio 44024

Dear Sierra Club and Ms. Hanratty:

The undersigned represents the Geauga Park District. This letter is to demand that you cease and desist from using the name and logo of the Geauga Park District, which appears in various locations on the website of Sierra Club Northeast Ohio Group, including on its homepage and as part of the Nov. / Dec. 2014 Newsletter posted Oct. 25, 2014. You have not obtained permission of the Geauga Park District to be displaying such name and logo and the inclusion improperly and confusingly associates the Geauga Park District with the Sierra Club. Further, such creates a false impression as to the origin of the information and opinions contained in the Newsletter.

In addition, the article itself contains various objectionable and untrue statements, including a claim that recent changes at the Park District indicate a "clear move to defunding the park district." Given the misappropriation of the Geauga Park District name and logo used in conjunction with the Newsletter, the Geauga Park District demands that you repost the Newsletter without the Geauga Park District name and logo, and clearly designate in the Newsletter that such statements and opinions are no way associated with the views and beliefs of the Geauga Park District.

If you fail to remove the Geauga Park District name and logo and/or fail to repost the Nov./Dec. 2014 Newsletter immediately, then the Geauga Park District will explore all available remedies, including judicial relief.

Sincerely,

THRASHER, DINSMORE & DOLAN

David M. Ondrey

DMO/ib

PLEASE REPLY TO: CHARDON