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A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

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*Please reply to* BRAD C. DEUTSCH  
*bdeutsch@gsblaw.com*  
TEL EXT 1793

June 12, 2015

**VIA CERTIFIED U.S. MAIL – RETURN RECEIPT REQUESTED  
AND BY EMAIL TO**

Mr. Cary L. Peterson

848 N. Rainbow Blvd., Suite 3419  
Las Vegas, NV 89107

1101 Pennsylvania Avenue, NW, FL-5  
Washington, DC 20004

info@betonbernie.com

Re: Bet on Bernie 2016

Dear Mr. Peterson:

This firm serves as legal counsel to Bernie 2016, Inc. (“Bernie 2016”), the official campaign committee for Senator Bernie Sanders’ 2016 U.S. presidential bid.

Your political committee, “Bet on Bernie 2016,” FEC Committee ID: C00572537 (the “PAC”) and associated campaigns (e.g., Ready for Bernie Sanders 2016) and websites “ready4bernie.com,” “betonbernie.com,” “pledgesanders2016.com,” “plus.google.com/+pledgesanders2016,” “facebook.com/readysanders2016,” and “facebook.com/groups/bet.on.bernie.sanders.2016” (collectively the “Campaigns and Websites”), have recently been brought to our attention.

While Bernie 2016 is grateful for your enthusiasm, we are compelled to inform you that your current efforts are illegal and are causing harmful confusion for supporters of Senator Sanders’ campaign.

As you surely understand, contributions are critical to the success of any political campaign. Your Campaigns and Websites are creating supporter confusion because they appear to be official pages for




the Bernie Sanders 2016 U.S. presidential campaign, and are therefore intercepting donations which are likely intended for the official campaign. In addition to this practical concern, your Campaigns and Websites violate federal law and infringe upon Bernie 2016's intellectual property.

Most obviously, the PAC's name "Bet on Bernie 2016" is a clear violation of section 102.14(a) of the FEC's rules, 11 CFR § 102.14(a), which prohibits your committee from using "the name of any candidate in its name."

Furthermore, section 110.16(b) of the FEC's rules, 11 CFR § 110.16(b), prohibits soliciting donations by fraudulently misrepresenting "the person as speaking, writing, or otherwise acting for or on behalf of any candidate or political party or employee or agent thereof for the purpose of soliciting contributions or donations . . . ."

In addition to these serious violations of federal law, your Campaigns and Websites infringe upon Bernie 2016's intellectual property. Bernie 2016 holds the trademarks and copyrights in "Bernie 2016,"

and the distinctive logo  (the "Bernie Marks"). Section 43(a) of the Lanham Act, 15 U.S.C. § 1125, prohibits the 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." As discussed above, your Campaigns and Websites have caused, and will continue to cause, this type of confusion among potential contributors to Bernie 2016. Your Campaigns and Websites also infringe upon Bernie 2016's copyrights in violation of 17 U.S.C. § 501.

We appreciate your support for Senator Sanders and this letter is intended to be a courtesy, in advance of any action Bernie 2016 may have to take to protect its rights and prevent fraud. It is our sincere hope that such action will not be necessary. To that end, please, confirm, within five (5) days of the date of this letter that you will immediately:

1. Take offline "ready4bernie.com," "betonbernie.com," "pledgesanders2016.com," "plus.google.com/+pledgesanders2016," "facebook.com/readyforsanders2016," "facebook.com/groups/bet.on.bernie.sanders.2016," and any other websites or social media accounts in your control associated with the "Bet on Bernie 2016" political committee or Senator Bernie Sanders.
2. Either change the name or terminate the "Bet on Bernie 2016" political committee;
3. Cease and Desist any further use of the Bernie Marks, any other deceptively or confusingly similar mark or proprietary content, or Senator Bernie Sanders' name and/or likeness;
4. Provide us a full financial accounting detailing all donations received by "Bet on Bernie 2016," and any and all associated campaigns.



Cary L. Peterson  
June 12, 2015  
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A prompt response is both appreciated and expected. If you have any questions, please have your attorney contact me at the number above.

Bernie 2016 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 from and/or contained in this letter shall be construed as, or deemed to be, an admission or a waiver by Bernie 2016.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad C. Deutsch", with a long horizontal line extending to the right.

Brad C. Deutsch



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June 19, 2015

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Mr. Cary L. Peterson

848 N. Rainbow Blvd., Suite 3419  
Las Vegas, NV 89107

1101 Pennsylvania Avenue, NW, FL-5  
Washington, DC 20004

clpeterson@rpflegal.com  
clpeterson@betonbernie.com

Re: Citizens Socially United (fka Bet on Bernie 2016)  
FEC Committee ID No. C00572537

Dear Mr. Peterson:

As you know, this firm serves as legal counsel to Bernie 2016, Inc. ("Bernie 2016"), the official campaign committee for Senator Bernie Sanders' 2016 U.S. presidential bid.

First, let me thank you for your recent phone and e-mail communications and the steps you have taken to comply with applicable copyright and trademark laws, as well as federal election law by changing the name of your political committee. I also want to thank you for your commitment to transition all of your activities to ensure that you and your activities do not misrepresent that you are in anyway affiliated with, endorsed by, or acting on behalf of Senator Sanders or Bernie 2016.

As you know, Senator Sanders has taken a strong position against the Supreme Court's *Citizens United* decision and the proliferation of so-called Super PACs. In fact, campaign finance reform is at the forefront of Senator Sanders' presidential campaign. Moreover, it is illegal for any candidate to



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Cary L. Peterson  
June 19, 2015  
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coordinate with a Super PAC, and therefore any communications between your political committee (which operates, in-part, as a Super PAC) and the campaign would risk leading to prohibited coordination and therefore would be inappropriate. Accordingly, the campaign is not granting any requests from Super PACs for meetings or direct communication.

As I have indicated to you before, we appreciate your continued support for Senator Sanders. However, in light of the legal issues outlined above and in our previous letter dated June 12, 2015, as well as because of Senator Sanders' fierce opposition to Super PACs, we must insist that you refrain from claiming or implying any connection between yourself or your political committee and Senator Sanders or his campaign.

Bernie 2016 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 from and/or contained in this letter shall be construed as, or deemed to be, an admission or a waiver by Bernie 2016.

Sincerely,

Brad C. Deutsch