



May 1, 2012

Mr. Kevin P. Chavous
Chair
Democrats for Education Reform
503 2nd Street, NE
Washington, DC 20002

Re: Demand that You Cease and Desist from Your Unlawful Use of the Name of the Democratic Party in Your Organization's Name in Los Angeles County

Dear Mr. Chavous:

It has come to my attention that your organization, Democrats for Education Reform, is unlawfully using the name of the Democratic Party and operating in Los Angeles County without a charter.

Under California Elections Code Section 20201, it is unlawful for any person, including an association, to use the name of the Democratic Party to solicit funds for any purpose whatsoever without a duly authorized charter from a statutorily recognized chartering authority. In addition to being a civil wrong, such actions are also a misdemeanor pursuant to Elections Code Section 18360.

Under Elections Code Section 20201 and the bylaws of the California Democratic Party, the Los Angeles County Democratic Party (LACDP) is the entity which has the principal legal authority to charter Democratic organizations operating in the County of Los Angeles. The Democrats for Education Reform has violated Elections Code Section 20201 by failing to obtain a charter from the LACDP or any other authorized chartering entity.

Use of the name of the Democratic Party, and any variations thereof, such as "Democratic" or "Democrat," is in derogation of the Democratic Party's common law trademark in its name. The Democrats for Education Reform's use of this trademarked name without the authorization and consent of the LACDP or any other chartering entity is legally sanctionable. The Democrats for Education Reform's trademark violation is further exacerbated by the Democrats for Education Reform's use of the Democratic Party name to promote the candidacy of state candidates, such as that of Mr. Brian C. Johnson's campaign for the California State Assembly.

Please be advised that if by May 10, 2012, your organization has not removed all reference to the Democratic Party and the words "Democratic" or "Democrat" from your name, including on any and all communications by Democrats for Education Reform (for example, websites, emails, mailers, notices, etc.) and by amending any statement of organization (California Secretary of

State Form 410) with the California Secretary of State, the LACDP will take appropriate steps to remedy Democrats for Education Reform's unlawful conduct.

I look forward to your anticipated prompt compliance with your legal obligations.

Sincerely,

A handwritten signature in black ink that reads "Eric Bauman". The signature is written in a cursive, slightly slanted style.

Eric C. Bauman
Chair
Los Angeles County Democratic Party

cc: Adam Seiden, Executive Director
Clark Lee, Political Director
Sen. Gloria Romero (ret.), California State Director, Democrats for Education Reform
Mr. Brian C. Johnson, Candidate for California State Assembly, District 46