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# THE WESTON A. PRICE FOUNDATION®

for **Wise Traditions** in Food, Farming and the Healing Arts

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October 14, 2015

Ms. Jean Harrah  
Chapter Leader  
Weston A. Price Foundation  
Santa Cruz County Chapter  
137 Kerr Rd  
Watsonville, CA 95076

VIA FEDEX & EMAIL  
jalysonh@yahoo.com

## Notice of Breach of Chapter Agreement and Termination

Dear Ms. Harrah:

You will recall that on January 11, 2008 you executed an Agreement permitting you to use trademarks owned by The Weston A Price Foundation ("WAPF") and detailing your obligations in that regard. Specifically, the agreement set forth how and when the WAPF Santa Cruz Chapter (the "Chapter") may use the marks THE WESTON A. PRICE FOUNDATION, WAPF, and the Weston A. Price Foundation Globe Logo (collectively, the "Marks"). We enclose a copy of the executed agreement for your reference.

It has come to our attention that the Chapter is in violation of the Agreement because it is associating the Marks with materials inconsistent with the Agreement and WAPF's mission. For example, the Chapter's Facebook page has published and/or republished materials critical of WAPF, its goods and services, and the goods and services of WAPF's partners, including false and defamatory materials published by Mr. David Gumpert and Ms. Kaayla Daniels. These disparaging materials violate several provisions of the Agreement, including:

- 9.b - The Chapter agrees to limit its use of the Mark to official business and activities endorsed and/or approved by WAPF . . . .

- 9.c - The Chapter agrees that any publications, educational materials, business cards, or other products bearing the Mark must be approved by WAPF prior to their use or dissemination.
- 9.d - If WAPF objects to any product, activity, or event, the Chapter must immediately cease use of the WAPF Mark in connection with such product, activity, or event.

Despite several warnings, including WAPF's September 18, 2015 notice regarding use of the mark in connection with the dissemination of Mr. Gumpert's and Ms. Daniel's false and defamatory materials, the Chapter's Facebook page continues to feature these materials.

Accordingly, pursuant to Sections 10 and 11 of the Agreement, we write to inform you that the Agreement has been terminated. You must immediately cease all of the Marks and you may not in any way indicate that the Chapter is or has been affiliated with WAPF. For example, you must immediately delete the Facebook profile page entitled "Weston A Price Foundation Santa Cruz Chapter," and cease all use of the WAPF name and logo.

Sincerely,

THE WESTON A. PRICE FOUNDATION

A handwritten signature in black ink that reads "Sally Fallon Morell". The signature is written in a cursive, flowing style.

Sally Fallon Morell