



**Cornell University**  
Office of University Counsel  
and Secretary of the Corporation

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**VIA EMAIL and US MAIL**  
(where postal address available)

June 19, 2019

Mr. Dominic Valdner, CFA Vice Chair  
2 Northside Piers  
Apartment 2W  
Brooklyn, NY 11249

6321 Porter Road  
Suite 8  
Sarasota, FL 342400

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**CEASE AND DESIST NOTICE**

Dear Mr. Valdner,

In his conversation with you, and in his June 12, 2019 letter to you (copy of June 12 letter and June 4 email referenced in the June 12 letter enclosed/attached for your reference) Cornell Athletic Director J. Andrew Noel (Andy) informed you of the numerous and lengthy conversations and negotiations over time with multiple Cornell Football Association leaders in attempts to obtain CFA's execution of an MOU and a trademark license. It has been explained repeatedly in detail to the many CFA leaders that the execution of the MOU and trademark license is necessary to meet the NCAA requirement of institutional control over NCAA-sponsored intercollegiate athletics support groups. Cornell's President Martha Pollack cannot attest on an annual basis to Cornell's NCAA compliance without these documents in place.


Andy's June 12 letter informed you that if the CFA did not execute the document as required, a Cease and Desist letter would be sent on July 19, 2019. It is unfortunate that all our efforts to reach a satisfactory result were not successful.

This letter is a formal demand that you immediately cease and desist from the unauthorized use of the Cornell name and mark(s).

Please confirm no later than 30 days following the date of this letter that this has been accomplished.

Please refer to the June 12 correspondence (enclosed/attached) for additional consequences as a result of the CFA's refusal to execute the MOU and trademark license.

Very truly yours,

  
Patricia A. McClary  
Deputy University Counsel

Enclosure(s)

Copies via Email and US Mail (where postal address available):

Heather Allen, Secretary  
Steve Lipic, Treasurer  
George Arangio  
John Boochever  
Kevin Boothe  
Cherise Coles  
Drew Fraser  
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Andy Noel