



AFFELD GRIVAKES ZUCKER LLP

2049 Century Park East, Suite 2460
Los Angeles, CA 90067
TEL (310) 979-8700
FAX (310) 979-8701
www.agzlaw.com

March 7, 2014

Via Regular Mail and Facsimile (570) 323-4192

Mr. Clifford Rieders
161 West Third Street
P.O. Box 215
Williamsport, Pennsylvania 17703-0215

Re: Save the ZOA

Dear Mr. Rieders:

Our firm represent Steven Goldberg, and this letter responds to your letter to Mr. Goldberg of March 6, 2014.

You have an important fact wrong. Mr. Goldberg is not using the website to fundraise. He's done no fundraising whatsoever, is not seeking a profit, and has no intention of selling the domain name. Consequently, both 15 U.S.C. 1125 (d) and 15 U.S.C. 8131 are inapplicable on their face. 42 Pa. C.S.A Section 8136 is inapplicable because Mr. Klein's name has no commercial value, and Mr. Goldberg is not using it for commercial or advertising purposes as he is not fundraising.

With regard to Mr. Klein's claim of defamation, Mr. Goldberg stands by the truthfulness of everything in the website and that he has said in the political campaign as to why he believes Mr. Klein should not be reelected as president of the ZOA. On the other hand, Mr. Klein has defamed Mr. Goldberg both before and during the campaign by spreading false and derogatory rumors about him that have nothing to do with the election or even the ZOA.

Mr. Klein needs to understand that Mr. Goldberg has free speech rights, and his use of the domain name and everything he has said in this campaign is classic political speech.

Mr. Goldberg denies all allegations of wrongdoing and categorically rejects your demands.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Loren Beck', with a large, stylized flourish at the end.

Loren Beck