## ROTHNER, SEGALL & GREENSTONE

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Jed Wallace, President California Charter Schools Ass'n 250 E 1st St., Suite 1000 Los Angeles, CA 90012

Re:

Violation of Rights in Name and Likeness

Dear Mr. Wallace:

We write on behalf of Joanne Waddell. On independent expenditure campaign literature the California Charter Schools Association ("CCSA") has disseminated supporting Laura Friedman for Assembly in the 43rd District, CCSA has used Ms. Waddell's name and likeness without her permission. We demand that you cease and desist from further disseminating such literature, publish a retraction that will correct the record with the voters of the District, and apologize to Ms. Waddell for your violation of her rights.

California has long recognized a common law right of privacy for protection of a person's name and likeness against appropriation by others for their advantage, commercial or otherwise. See, e.g., Stewart v. Rolling Stone LLC, 181 Cal. App. 4th 664 (2010). In addition, California Civil Code § 3344 prohibits the use of one's name or likeness without that person's prior consent. Absent CCSA's compliance with this demand that it cease and desist from violating Ms. Waddell's rights in her personality, we will take all appropriate legal action on her behalf.

Kindly direct further communication concerning this matter to the undersigned.

Very truly yours,

Glenn Rothner

GR/vc