

April 29, 2025

LLOYD J. JORDAN, ESQ.
lloyd.jordan@motleywaller.com

**VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED AND
ELECTRONIC MAIL**

Archon Loren R. Douglass

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**Re: Cease and Desist- Unauthorized Use of Sigma Pi Phi Fraternity
Trademarks, Confidential Information, and Misrepresentation of Authority**

Dear Archon Douglass:

This firm represents the Grand Boule of Sigma Pi Phi Fraternity ("Fraternity" or the "Boule"). It has come to our attention that you operate at least two websites that infringe upon the Fraternity's federally registered trademarks: seizethefuture.org and <https://preview.mailerlite.io/emails/webview/> (the "Infringing Websites").

Additionally, you have violated the following:

- You have improperly disclosed confidential Fraternity information, misuse of Fraternity letterhead, and misrepresenting your authority to Fraternity members.
- The Fraternity is the rightful owner of numerous federally registered marks (the "Fraternity Marks"). These marks are valuable assets representing the goodwill and esteemed reputation to the Fraternity that has been cultivated since its founding. Your unauthorized use of the Fraternity Marks on the Infringing Websites creates a clear likelihood of confusion among Fraternity members and the public regarding the source, sponsorship, or affiliation of your websites and activities, thereby constituting trademark infringement. Furthermore, your actions are likely to constitute violations of other laws.¹
- In addition to your unauthorized emails, the Infringing Websites display and broadcast of confidential information belonging to the Fraternity. The dissemination of such internal information is unauthorized and harmful to the Fraternity. Your use of official Fraternity letterhead in connection with your

¹ This letter is not intended to provide you any legal advice. The writer of this email is not licensed in the State of New York. But if enforcement of the letter is required, New York counsel will be retained.

activities is also unauthorized and contributes to the false impression that your actions are sanctioned by, or at the direction of, the Fraternity.

- Furthermore, be advised that you have represented to the Fraternity members that you possess the authority to call meetings of the Grand Board or other meetings related to the Fraternity. You possess no such authority. Attempting to convene or state that you can convene such meetings is a serious misrepresentation.

These actions – including the unauthorized use of the Fraternity Marks, dissemination of confidential information, misuse of Fraternity letterhead, and the misrepresentation of authority – are each and collectively in direct violation of the Fraternity's Governance Laws and Code of Conduct, which you are obligated to uphold as a member.

DEMAND IS HEREBY MADE that you immediately take the following actions:

1. **Cease and Desist** all use of the Fraternity Marks, or any confusingly similar variations thereof, on the Infringing Websites and any other websites, social media platforms, communications, or materials under your control.
2. **Permanently Remove** all content related to the Fraternity Marks and all confidential Fraternity information (including internal documents, communications, membership data, etc.) from the Infringing Websites and any other platform or medium under your control.
3. **Cease and Desist** all use of Fraternity letterhead or any documents that imitate or suggest official Fraternity communications.
4. **Cease and Desist** from representing, explicitly or implicitly, that you have the authority to call meetings of the Grand Board, any Fraternity committee, or any other meeting on behalf of or related to the Fraternity.
5. **Provide written confirmation** to the undersigned, **no later than 5:00 p.m. (EST) April 30, 2025**, that you have canceled the meeting you scheduled as a “Grand Board Meeting.”

Please be advised that your actions constitute serious violations of both federal and state law, as well as the internal governing documents of the Fraternity. Failure to comply fully and immediately with the demands herein will leave the Fraternity with no alternative but to pursue all available legal remedies against you. Such remedies may include seeking preliminary and permanent injunctive relief, monetary damages (including potential statutory or treble damages where applicable), recovery of profits, and attorney's fees and costs.

Furthermore, your conduct constitutes a severe breach of your obligations as a member of Sigma Pi Phi Fraternity. Failure to comply with this letter and cease the offending activities may result in disciplinary action by the Fraternity in accordance

with its Governance Laws and Code of Conduct, up to and including expulsion from the Fraternity.

This letter constitutes a demand for resolution and is without prejudice to any of the rights and remedies available to the Grand Fraternity of Sigma Pi Phi Fraternity, all of which are expressly reserved. We expect your prompt attention and full compliance with this matter.

Govern yourself accordingly.

Sincerely,

A handwritten signature in black ink, appearing to read "Lloyd J. Jordan", written in a cursive style.

Lloyd Jordan