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May 15, 2023

DONALD J. TRUMP c/o Joseph Tacopina Tacopina Seigel 275 Madison Avenue, 35th Floor New York, NY. 10016

NOTICE TO CEASE AND DESIST

Dear Mr. Tacopina:

My husband is Victor Willis, the lead singer of Village People and writer of the all the group's biggest hits including "MACHO MAN" "IN THE NAVY" "GO WEST," and of course, "Y.M.C.A."

It has come to our attention that President Trump allowed a group of individuals dressed as Village People to perform, including but not limited to, "Macho Man," at Mar A Largo on Thursday May 11, 2023. An example of the unauthorized performance is found here:

 $\frac{https://twitter.com/MJisMAGA/status/1657000256674881537?cxt=HHwWgoCzvYm97P}{4tAAAA}$

Since that time we have been inundated with social media posts about the imitation performance where many fans, and the general public as well, mistakenly believe to be that of the actual VILLAGE PEOPLE in violation of the Lanham Act.

Therefore, the performance has, and continues to cause public confusion as to why Village People would even engage in such a performance. We did not.

Moreover, your client is hereby on NOTICE that U.S. Trademark law protects against the unauthorized use the Village People image and trade dress. To be certain, the use of the group's image and likeness at Mar a Largo was unauthorized.

Though my husband has tolerated your client's use of his Village People music, we cannot allow such use by him to cause public confusion as to endorsement.

Therefore, it is requested that he cease and desist any such further unauthorized use of the Village People image in association with the songs and his campaign (or in his personal capacity).

Otherwise, we shall be forced to bring suit preventing further use, not only of the Village People trademarked image and trade dress, but of the music as well (and we'd hate to have to do that) but such combined use causes public confusion and is suggestive of endorsement.

Accordingly, within 10 days, please inform me of his intentions with respect to any further unauthorized use the Village People image and trade dress in association with the use of Village People music, and the Donald J Trump campaign or in his personal capacity.

Sincerely,

Karen L. Willis, J.D.

Manager/VILLAGE PEOPLE