



May 2, 2019

**VIA U.S. MAIL AND E-MAIL**

Mr. Alex Triantafyllou  
Chief Financial Officer  
Chico Rugby Foundation, Inc. ("CRF")  
902 Sequoyah Ave.  
Chico, CA 95926-2128  
[alex.j.t@sbcglobal.net](mailto:alex.j.t@sbcglobal.net)

Mr. James (Beau) McSwain  
Chief Executive Officer  
Chico Rugby Foundation, Inc.  
902 Sequoyah Ave.  
Chico, CA 95926-2128  
[bmcswain@amgchico.com](mailto:bmcswain@amgchico.com)

Board Members  
Chico State Rugby Alumni & Boosters Association ("CSRABA")  
[csraba@chicorugby.org](mailto:csraba@chicorugby.org)

***Re: CRF and CSRABA - Cease and Desist Use of California State University Name***

Dear Mr. Triantafyllou, Mr. McSwain, and CSRABA Board Members:

I write on behalf of California State University, Chico ("CSU, Chico"), one of the twenty-three campuses that comprise the California State University ("CSU").

This letter serves as notice to you and your organizations, the Chico Rugby Foundation Inc. and Chico State Rugby Alumni & Boosters Association ("Organizations"), to remove mention of the name "California State University," and any of its derivations or abbreviations ("CSU Names"), in association with your Organizations. By using the CSU Names, your Organizations claim an affiliation with or endorsement by the CSU, where none exists.

Under California Education Code section 89005.5, the name "California State University," including the names of all the CSU campuses and derivations and abbreviations of those names, are the property of the State of California. The names and abbreviations that belong to the CSU, include, but are not limited to: "California State University", "Cal State", "CSU", "CSUC", "CSU, Chico", and "Chico State". (See California Education Code Section 89005.5). Any and all property rights attaching to those names and marks are exclusively owned by the CSU. The CSU names and marks are likewise protected by numerous federal trademark registrations as well as federal trademark law.



Office of the Vice President for Student Affairs  
530-898-6131  
Fax: 530-898-4491  
www.csuchico.edu/sa

Your repeated use of various CSU Names in connection with your Organizations' activities violates federal and state laws. Examples of your illegal use of the CSU Names are attached to this letter and include, but, are not limited too, the following references on your website (<https://chicorugby.org/clubs/>):

- "CSU, Chico"
- "Chico State"
- "Chico State Women's Rugby"
- "Chico State Women's RFC"
- "Chico State WRFC"
- "Chico State Women's Roster"
- "Chico State Men's Rugby"
- "Chico State's Club Sports"
- "Chico State University Sports Clubs"
- The use of the name "Chico State" in the name of your CSRABA Organization

The CSU has never authorized you or your Organizations to use the CSU Names and/or marks for commercial or other purposes. CSU, Chico will permit only officially recognized student organizations to state an affiliation with CSU, Chico and use the CSU name. Your Organizations are not recognized by CSU, Chico, and they misrepresent themselves when they use the CSU Names. For example, your Organizations use the CSU Names without permission in social media and at community events. Your Organizations also purport to seek members and donations on behalf of CSU, Chico or Chico State. By making such unauthorized use of the CSU Names, your Organizations are improperly profiting from the goodwill and reputation associated with the CSU.

Accordingly, we demand that you and your Organizations immediately remove the CSU Names and any claim of affiliation with the CSU from all CRF and CSRABA publications and promotional materials, including, but, not limited to, websites, social networking sites such as Facebook, and apparel. Your Organizations must remove any mention of, or claim of affiliation with, the CSU immediately. If the CSU name, and all derivations and abbreviations thereof, are not removed by June 1, 2019, CSU, Chico will pursue further action.

I hope you will honor this notice and cease your unlawful use of the CSU Names.

Sincerely,

Milton Lang, Ed.D.  
Vice President for Student Affairs  
Chief Diversity Officer