

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

FRED MARTIN MOTOR COMPANY,
3195 Barber Rd
Norton, Ohio 44203

Plaintiff,

v.

CRAIN COMMUNICATIONS, INC.
1155 Gratiot Avenue
Detroit, Michigan 48207

Defendant.

Case No.: _____

Hon. _____, U.S.D.J.

**VERIFIED COMPLAINT FOR
TRADEMARK INFRINGEMENT
AND UNFAIR COMPETITION**

JURY DEMAND ENDORSED HEREON

Plaintiff, Fred Martin Motor Co. d/b/a Fred Martin Superstore (“Fred Martin”), for its Complaint against Defendant Crain Communications, Inc. because of Crain’s infringement of Fred Martin’s registered and long-established trademark “We Know Cars” by the use of the slogan “We Know Cars. Let’s Find Yours” and other misconduct, states and alleges as follows:

PARTIES

1. Plaintiff, Fred Martin is a citizen of the State of Ohio, being an Ohio corporation with its office and principal place of business in Barberton, Ohio.

2. Upon information and belief, Defendant Crain Communications, Inc. (“Crain”) is a citizen of the States of Michigan, with its office and principal place of business in Detroit, Michigan.

JURISDICTION AND VENUE

3. This Court has jurisdiction pursuant to 15 U.S.C. § 1114, 15 U.S.C. §§ 1116 - 1118, inclusive; 15 U.S.C. § 1121, 15 U.S.C. § 1125(a) and 28 U.S.C. §§ 1331 and 1338(a) over the federal trademark infringement and dilution claims, which arise under the Federal Lanham Act, 15 U.S.C. §§ 1051, *et*

seq.; and has jurisdiction pursuant to 28 U.S.C. §§ 1338 and 1367 over the state unfair competition and common law trademark infringement claims.

4. This Court has original jurisdiction under the provisions of 15 U.S.C. § 1114, 15 U.S.C. § 1121, 15 U.S.C. § 1125(a), 28 U.S.C. § 1331 and 28 U.S.C. § 1338(a), in that the claims arise under the trademark laws of the United States, 15 U.S.C. § 1051, *et seq.*

5. The Court also has original jurisdiction under 28 U.S.C. §§ 1338(b) with respect to claims arising under common law rights and claims arising under the laws of the State of Ohio in that such claims are joined with the substantial and related claim under the trademark laws of the United States, 15 U.S.C. §§ 1051, *et seq.*

6. Supplemental federal jurisdiction is also invoked under 28 U.S.C. § 1367(a) with respect to all other claims that are so related to the claims in this action within the original jurisdiction of this Court that they form part of the same case or controversy under Article III of the United States Constitution.

7. Venue for these claims is proper in this Court under 28 U.S.C. § 1391(b)(2) in that a substantial part of the events or omissions giving rise to the claim occurred in this judicial district.

FACTS

Fred Martin's Trademark:

8. Fred Martin is, and for many years prior to the acts herein complained of has been, engaged in the sale of new and used motor vehicles and the sale of motor vehicle related goods and equipment, including but not limited to Internet sales, more specifically (the "Products") and the provision of related repair services (the "Services") under the mark WE KNOW CARS which is registered in the U.S. Patent and Trademark Office (the "Mark"):

<u>Mark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Date of First Use in Interstate Commerce</u>
WE KNOW CARS	3,150,757	10/3/06	2004

The Mark has been used continuously in commerce in connection with the Products and Services beginning at least as early as the dates set forth above. The Mark is incontestable pursuant to 15 U.S.C. § 1065. See, Exhibit 1.

9. The Mark was developed by Fred Martin to distinguish the Products and Services from motor vehicle sales and services sold by others by, among other things, prominently displaying and utilizing the Mark on its dealership signage (Exhibit 2), display lot (Exhibit 3), Internet web site, in commercials and other various promotions, on trucks and delivery vehicles used with the Products and Services (Exhibit 4), on uniforms and other forms of identification used by staff (Exhibits 5 and 6), rental cars (Exhibit 7) and in catalogs, flyers, trade and other advertising materials both distributed by hard-copy and appearing on-line (Exhibits 8 and 9).

10. Fred Martin's Products and Services are sold primarily to consumers in the motor vehicle sales and service market.

11. Fred Martin has used the Mark continuously on and/or in connection with the Products and Services since its inception, and it has acquired strong secondary meaning as being indicative of the source of knowledgeable sales and service staff in the sale of motor vehicles and related Services.

12. As a result of Fred Martin's expenditure of a considerable amount of money and continuously marketing its Products and Services in connection with the distinctive and familiar Mark, the consuming public has come to recognize all motor vehicles and related items and Services sold in connection with the Mark as originating from or otherwise approved or sponsored by or affiliated or connected with Fred Martin.

Fred Martin and Crain Compete Directly:

13. Crain is a direct competitor of Fred Martin. Upon information and belief, Crain owns and operates Autoweek Media Group, which delivers information to car buyers and utilizes www.shopautoweek.com to provide Internet shopping for motor vehicles. Upon information and belief, for a charge fee or commission, Crain allows dealers to utilize www.shopautoweek.com

to market its inventory and generate sales leads. See Exhibit 10, attached. The motor vehicles marketed through the site are functionally equivalent to and, in some cases, identical to Fred Martin's Products. It is unknown whether Crain provides services related to motor vehicles.

14. The methods of distribution by the two companies are substantially similar. Both companies operate an Internet website with information relating to motor vehicles sold. Crain directs consumers to dealers providing the vehicles Crain's website helps identify, while Fred Martin markets its own inventory.

15. Fred Martin stocks its inventory on lots that display the respective company's trademarks including the Mark at issue. Most of the customers are consumers purchasing motor vehicles for personal use.

16. Fred Martin and Crain both compete for the same customers. Their success depends on establishing a strong ongoing relationship with the customers, based on the products they are marketing and the trust ingrained in customers through marketing and reputation. Customer perception of the respective companies and their products is very important to their success. Fred Martin must be able to distinguish themselves and the products they are selling from other motor vehicle dealers against whom they are competing. Fred Martin's Mark at issue, the slogan "We Know Cars," has created a very distinctive positive perception of Fred Martin's dealers and its Products and Services in the minds of the customers.

17. Fred Martin and Crain make extensive use of websites showing their company's products and these websites are available to their customers to look at independently. Fred Martin also makes extensive use of advertising campaigns utilizing the Mark. Fred Martin's promotional message prominently displays the Mark at issue. Given the pervasive use of the internet for its sales efforts, a "Goggle" search of "We Know Cars" reveals both Fred Martin's website and Crain's. See, Exhibit 11.

18. Crain is substantially larger than Fred Martin. It is a privately owned corporation that produces trade and consumer website, magazines and periodicals worldwide. Crain boasts on its web site that it "is one of the largest privately owned business media companies with 30

leading business, trade and consumer brands in North America, Europe and Asia.” Crain also reports on its web site that it has 850 employees in 11 locations. <http://www.crain.com/publications/index.html>. In contrast, Fred Martin is owned privately and has direct contact with its customers.

19. Fred Martin is focused on growth and the expansion of its market share with, “We Know Cars” being a large part of the marketing plan.

Crain’s Infringing Conduct:

20. Fred Martin recently learned that Crain’s www.shopautoweek.com website (“the Website”) prominently displayed the slogan “We Know Cars. Let’s Find Yours,” (“the Infringing Slogan”). Upon information and belief, the Website was first launched in October of 2011. A copy of the Website Homepage is attached as Exhibit 12. The Infringing Slogan is confusingly similar to Fred Martin’s Mark. Upon learning of the Infringing Slogan, counsel for Fred Martin directed Crain to cease and desist further use and confusion. By letter under date of April 25, 2012, counsel for Crain cavalierly dismissed Fred Martin’s legitimate demand and indicated that Crain has no intent to cease its interference leaving Fred Martin no alternative but to seek judicial relief.

21. The Infringing Slogan is being used by Crain in an attempt to pass its products and services off as if they are Fred Martin’s Products and Services and in a manner calculated to deceive the ultimate customers for Fred Martin’s Products and Services and members of the general public. Crain has utilized the Infringing Slogan to divert Fred Martin’s business and in an effort to make Crain’s products and services confusingly similar to Fred Martin’s Products and Services.

22. The natural, probable and foreseeable result of Crain’s wrongful conduct, as alleged above, has been to deprive Fred Martin of the benefits of using, selling, and licensing its Mark. Fred Martin has also suffered a substantial loss of goodwill. Crain’s conduct has also created a likelihood of confusion between Fred Martin’s Products and Services and Crain’s

products and services, and has injured Fred Martin's relations with present and prospective customers.

23. Fred Martin alleges that unless enjoined by this Court, Crain intends to continue their course of conduct and to wrongfully use, infringe upon, and otherwise profit from Fred Martin's Mark.

24. As a direct and proximate result of the acts alleged above, Fred Martin has already suffered irreparable injury, and lost profits. Fred Martin has no adequate remedy at law to redress all of the injuries that Crain has caused and intends to cause by its conduct. Fred Martin will continue to suffer irreparable damage and injury until Crain's actions alleged above are enjoined by this Court.

FIRST CLAIM FOR RELIEF

(Infringement of Federally Registered Trademark - 15 U.S.C. § 1114)

25. Fred Martin realleges and incorporates by this reference each and every allegation contained in paragraphs 1-24 of this Complaint as if fully set forth.

26. The actions of Crain described herein constitute infringement of the Mark in violation of Section 32(b) of the Lanham Act, 15 U.S.C. § 1114. Crain continues to use the Mark without authorization in connection with Crain's website, promotion and distribution of Crain's products and services in and affecting interstate commerce.

27. Crain's products and services sold in connection with the Mark are sold in and/or otherwise affect interstate commerce to the same consuming public and travel through the same trade channels as Fred Martin's Products and Services.

28. Crain's products and services sold in connection with the Mark range from functionally equivalent to identical to Fred Martin's Products and Services and compete directly with Fred Martin's Products and Services.

29. Crain has willfully and knowingly infringed and will continue to further infringe the rights of Fred Martin and its federally registered Mark, in violation of 15 U.S.C. § 1114, as a result of the continued, unauthorized use of the Infringing Slogan, with the intention of deceiving

and misleading the consuming public, and by wrongfully trading on the goodwill and reputation of Fred Martin.

30. The use by Crain of the Infringing Slogan is likely to cause confusion or mistake or deception of purchasers as to the source, origin, sponsorship, affiliation, approval or connection of Fred Martin and its products and services.

31. By its wrongful acts, Crain has caused and is likely to continue to cause great injury and damage to Fred Martin which cannot now be accurately computed and, unless restrained by the Court, Crain will continue to cause irreparable injury and damage to Fred Martin and to the goodwill associated with Fred Martin's Mark.

32. Because of Fred Martin's long-established and extensive use of its Mark, Crain knew or should have known that it had no legal basis to use the Infringing Slogan that is plainly confusingly similar to the Fred Martin Mark. Despite this knowledge, Crain willfully infringed on Fred Martin's Mark.

33. As a result of Crain's willful infringement of Fred Martin's Mark, Fred Martin requests judgment granting temporary, preliminary and permanent injunctions, together with damages, costs of suits and reasonable attorney's fees pursuant to 15 U.S.C. § 1117(b).

SECOND CLAIM FOR RELIEF

(False Designation of Origin and Unfair Competition under the Lanham Act – 15 U.S.C. § 1125(a))

34. Fred Martin realleges and incorporates by this reference each and every allegation contained in paragraphs 1-33 of this Complaint as if fully set forth.

35. Crain's use of the Infringing Slogan in connection with the promotion and distribution of its products and services in commerce has caused or is likely to cause confusion, mistake and deception among consuming public as to the origin, sponsorship, and/or approval of the Crain's products and services.

36. As a result of Crain's intentional, wrongful acts, purchasers have purchased or are likely to purchase Crain's associated products and services bearing the Infringing Slogan

thereby injuring Fred Martin by diversion of sales to dealerships marketing their services through Crain.

37. Fred Martin has no control over the quality of the products and services sold by competitors marketing their services through Crain and, because of the confusion as to the origin, sponsorship or approval of such products and services engendered by Crain, Fred Martin's extensive and valuable goodwill is at the mercy of Crain and the dealerships marketing through Crain, and Fred Martin will suffer irreparable harm should such false representation be allowed to occur.

38. Such acts by Crain were willful and deliberate, and designed to specifically trade upon the valuable goodwill of Fred Martin.

39. By its wrongful acts, Crain has caused and will continue to cause great harm and damage to Fred Martin which cannot now be assessed or computed and, unless restrained by the Court, will continue to cause irreparable injury and damage to Fred Martin and to the goodwill associated with the Mark.

40. As a direct and proximate result of the foregoing, Fred Martin has and will continue to suffer damages according to proof at trial. Consistent with 15 U.S.C. § 1117(a), among other remedies, Fred Martin is entitled to injunctive relief.

41. Crain knew or should have known that it had no legal basis to use Fred Martin's Mark. Despite its knowledge, Crain willfully violated 15 U.S.C. § 1125(a).

THIRD CLAIM FOR RELIEF

(Unjust Enrichment)

42. Fred Martin realleges and incorporates by this reference each and every allegation contained in paragraphs 1-41 of this Complaint as if fully set forth.

43. This claim arises under the principles of equity concerning unjust enrichment and misappropriation of rights.

44. Fred Martin has expended a considerable amount of time, money and effort developing and promoting the Mark for Fred Martin's Products and Services.

45. By reason of its competition with Fred Martin, Crain acquired actual knowledge that the consuming public recognizes Products and Services sold under the Mark as emanating from Fred Martin.

46. The unauthorized use of the Infringing Slogan by Crain for products and services it markets has caused and is likely to cause confusion with Fred Martin's Products and Services bearing the Mark.

47. Crain has acted unfairly in using the Infringing Slogan.

48. Crain has taken and will continue to take unfair advantage of the goodwill and business value developed by Fred Martin in the Mark.

49. Crain has misappropriated and will continue to misappropriate and illegally exploit the valuable property rights and goodwill of Fred Martin and its Mark. As a result of such misappropriation, Fred Martin will suffer irreparable injury to its property and goodwill, and Crain will be unjustly enriched thereby to the detriment of Fred Martin, entitling Fred Martin to damages, injunctive relief and its costs of suit.

FOURTH CLAIM FOR RELIEF
(Unfair Competition Under O.R.C. Chapter 4165)

50. Fred Martin realleges and incorporates by this reference each and every allegation contained in paragraphs 1-49 of this Complaint as if fully set forth.

51. The actions of Crain described herein constitute unlawful, unfair and fraudulent business acts and practices in violation of Ohio law, specifically Ohio Revised Code Sections 4165.01 et seq. Without authorization, Crain has intentionally marketed products and services under the Infringing Slogan, so as to pass off such products and services as those of Fred Martin, to confuse and deceive purchasers as to the source, sponsorship, approval or certification of, or the affiliation, connection or association with the products and services marketed by Crain; and to obtain the acceptance of products and services marketed by Crain based on the reputation and good will of Fred Martin and its high-quality Products and Services sold in connection with the Mark.

52. As a direct and proximate result of Crain's wrongful conduct, Crain has caused and will cause confusion, mistake and deception among the purchasing public as to the source of products and services marketed by Crain and Crain has received and will continue to receive profits generated from the strength of Fred Martin's success, goodwill and customer recognition. As a result of these acts of infringement and unfair competition, Fred Martin has suffered and will continue to suffer irreparable injury and damage to its business relationships with its current and prospective customers, including but not limited to lost profits, lost reputation and loss of goodwill.

53. Fred Martin is accordingly entitled to damages, injunctive relief and its costs of suit.

FIFTH CLAIM FOR RELIEF
(Common Law Trademark Infringement and Unfair Competition)

54. Fred Martin re-alleges and incorporates by this reference each and every allegation contained in paragraphs 1-55 of this Complaint as if fully set forth.

55. Fred Martin has used the Mark in connection with the distribution and sales of the Products and Services in Ohio and throughout the United States and, as such, Fred Martin owns and enjoys common law rights in Ohio and throughout the United States in and to the Mark which are superior to any rights which Crain may claim in and to the Mark in any form or style with respect to the sale of motor vehicles and related products and services.

56. Use of the Infringing Slogan by Crain in connection with the sale of motor vehicles in the State of Ohio and elsewhere throughout the United States has caused and is likely to cause confusion as to the source of the products and services marketed by Crain in that the purchasers thereof have associated or will be likely to associate the products and services marketed by Crain with and as originating from or being sponsored or approved by or affiliated or connected with Fred Martin, to the detriment of Fred Martin.

57. As a result of these acts of infringement and unfair competition by Crain, Fred Martin has suffered and will continue to suffer irreparable injury to its reputation and goodwill, entitling it to damages, injunctive relief and its costs of suit.

SIXTH CLAIM FOR RELIEF

(Trademark Dilution under 15 U.S.C. § 1125(c) and Ohio Common Law)

58. Fred Martin repeats and alleges each and every allegation contained in paragraphs 1 through 57 of this Complaint, and incorporates them herein as though set forth in full.

59. As a result of the duration and extent of Fred Martin's use of the Mark, the duration and extent of the use of the Mark in Fred Martin's advertising and publicity, and the geographical extent of the distribution of Fred Martin's Products and Services, the superior quality of Fred Martin's Products and Services, and the degree of recognition of the Mark, the Mark has achieved an extensive degree of distinctiveness and is a famous trademark.

60. As a result of longevity of the Mark, the Mark has achieved a status of Incontestability.

61. As a result of Defendant's use of the Mark, Defendant is diluting the distinctive quality of the Mark.

62. Fred Martin will suffer irreparable harm should Defendant's illegal acts be allowed to continue to the great detriment of its reputation and goodwill. Defendant's acts will continue unless enjoined.

63. As a result of these acts of infringement and unfair competition by Crain, Fred Martin has suffered and will continue to suffer irreparable injury to its reputation and goodwill, entitling it to damages, injunctive relief and its costs of suit.

(Preliminary and Permanent Injunction)

64. Fred Martin realleges and incorporates by this reference each and every allegation contained in paragraphs 1-63 of this Complaint as if fully set forth.

65. Beginning on or about August 16, 2011, and continuing to the present time, Crain wrongfully and unlawfully infringed Fred Martin's Mark by the use of the Infringing Slogan without authorization in connection with Crain's promotion of products and services.

66. Crain's wrongful conduct, unless and until enjoined and restrained by order of this Court, will cause great and irreparable injury to Fred Martin in that Crain's continued infringement of Fred Martin's Mark will deceive and mislead the consuming public and will cause harm to the goodwill and reputation of Fred Martin. Crain's conduct will further cause confusion, mistake and deception of the consuming public and will result in dilution of the Mark and diversion of sales from Fred Martin.

67. Fred Martin has no adequate remedy at law for the injuries currently being suffered. It will be impossible for Fred Martin to determine the precise amount of damage that it will suffer if Crain's conduct is not restrained and, Fred Martin may be forced to institute a multiplicity of actions to obtain adequate compensation for its injuries.

68. Fred Martin seeks a preliminary and permanent injunction restraining and enjoining Crain, its agents, servants, employees, successors and assigns and all others acting in concert or participation with them as follows:

a. From infringement of Fred Martin's Mark (U.S. Trademark Registration Number 3,150,757) by requiring the complete removal of the Infringing Slogan from the marketplace, including but not limited by recovering all promotional materials with the Infringing Slogan and removing it from the website and all other forms of advertising, or as otherwise may be required;

b. From unfairly competing with Fred Martin by requiring the complete removal of the Infringing Slogan from the marketplace, including but not limited by recovering all promotional materials with the Infringing Slogan and removing it from the website and all other forms of advertising, or as otherwise may be required;

c. From engaging in unfair and deceptive trade practices by requiring the complete removal of the Infringing Slogan from the marketplace, including but not limited by

recovering all promotional materials with the Infringing Slogan and removing it from the website and all other forms of advertising, or as otherwise may be required;

d. From infringing upon and competing unfairly with Fred Martin with respect to its common law and state rights in the Mark by requiring the complete removal of the Infringing Slogan from the marketplace, including but not limited by recovering all promotional materials with the Infringing Slogan and removing it from the website and all other forms of advertising, or as otherwise may be required;

e. From dilution of Fred Martin's Mark by requiring the complete removal of the Infringing Slogan from the marketplace, including but not limited by recovering all catalogs and flyers with the Infringing Slogan and removing it from the website catalog and all other forms of advertising, or as otherwise may be required;

f. From injuring Fred Martin's business reputation by requiring the complete removal of the Infringing Slogan from the marketplace, including but not limited by recovering all promotional materials with the Infringing Slogan and removing it from the website and all other forms of advertising, or as otherwise may be required;

g. From leading anyone to believe or representing, either orally or in writing, that Crain is associated with Fred Martin or otherwise professionally affiliated or associated with Fred Martin, or that Crain's products and services are Fred Martin's Products and Services;

REQUEST FOR RELIEF

WHEREFORE, Fred Martin requests relief against Crain:

1. Judgment that Fred Martin's Trademark has been infringed and/or diluted by Crain's actions under 15 U.S.C. §1114, 15 U.S.C. §1123(c)(1) and Federal Common Law;

2. Judgment that Crain has unfairly competed with Fred Martin in violation of Ohio Revised Code Sections 4165.01 *et seq.*;

3. Judgment that Crain has been unjustly enriched through its use of the Mark;

4. Judgment that Crain, and its officers, shareholders, directors, agents, servants, employees, attorneys, parent company, confederates and all persons in active concert or participation with them, be enjoined preliminarily and permanently:

a. From infringement of Fred Martin's Mark (U.S. Trademark Registration Number 3,150,757) by requiring the complete removal of the Infringing Slogan from the marketplace, including but not limited by recovering all promotional materials with the Infringing Slogan and removing it from the website and all other forms of advertising, or as otherwise may be required;

b. From unfairly competing with Fred Martin by requiring the complete removal of the Infringing Slogan from the marketplace, including but not limited by recovering all promotional materials with the Infringing Slogan and removing it from the website and all other forms of advertising, or as otherwise may be required;

c. From engaging in unfair and deceptive trade practices by requiring the complete removal of the Infringing Slogan from the marketplace, including but not limited by recovering all promotional materials with the Infringing Slogan and removing it from the website and all other forms of advertising, or as otherwise may be required;

d. From infringing upon and competing unfairly with Fred Martin with respect to its common law and state rights in the Mark by requiring the complete removal of the Infringing Slogan from the marketplace, including but not limited by recovering all promotional materials with the Infringing Slogan and removing it from the website and all other forms of advertising, or as otherwise may be required;

e. From dilution of Fred Martin's Mark by requiring the complete removal of the Infringing Slogan from the marketplace, including but not limited by recovering all catalogs and flyers with the Infringing Slogan and removing it from the website catalog and all other forms of advertising, or as otherwise may be required;

f. From injuring Fred Martin's business reputation by requiring the complete removal of the Infringing Slogan from the marketplace, including but not limited by

recovering all promotional materials with the Infringing Slogan and removing it from the website and all other forms of advertising, or as otherwise may be required;

g. From leading anyone to believe or representing, either orally or in writing, that Crain is associated with Fred Martin or otherwise professionally affiliated or associated with Fred Martin, or that Crain's products and services are Fred Martin's Products and Services;

On All Claims for Relief:

For damages as may be established at trial, costs of suit and such other and further relief as the Court may deem just and proper.

Respectfully submitted,

RODERICK LINTON BELFANCE, LLP

/s/ LAWRENCE R. BACH

LAWRENCE R. BACH (0021205)

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Attorney for Plaintiff

JURY DEMAND

Plaintiff demands a trial by jury as to all matters in this case.

/s/ LAWRENCE R. BACH

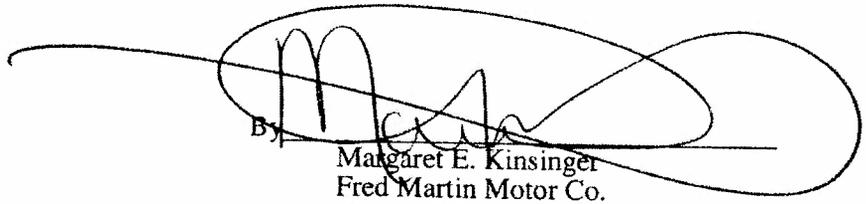
LAWRENCE R. BACH (0021205)

VERIFICATION

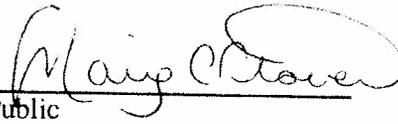
STATE OF OHIO
COUNTY OF SUMMIT SS

Margaret E. Kinsinger, having first been duly cautioned and sworn, state as follows:

1. I am the Controller and of Fred Martin Motor Co. d/b/a Fred Martin Superstore ("Fred Martin")
2. I have reviewed and verified the complaint for injunctive and other relief including all exhibits attached thereto. To the best of my knowledge, information, and belief, all the facts alleged therein are true and the exhibits fairly and accurately depict the images described in the complaint.


By _____
Margaret E. Kinsinger
Fred Martin Motor Co.

SWORN TO BEFORE ME and subscribed in my presence on this 11th day of June,
2012.



Notary Public

My Commission expires: 7.25.2012



MARIE C. STOVER
Notary Public - State of Ohio
My Commission Expires July 25, 2012 *2*