



November 3, 2011

VIA EMAIL & U.S. MAIL

Mr. Greg Neyman
Answers In Creation
P.O. Box 653
Springfield, OH 45501-0653
gneyman@answersincreation.org

Re: Answers in Genesis and AIG trademarks

Dear Mr. Neyman:

We represent Answers in Genesis, Inc. ("AiG"). AiG owns the trademarks ANSWERS IN GENESIS and AIG for Christian ministerial and educational services. It has come to our attention that you are using the marks ANSWERS IN CREATION and AIC to offer the same services, namely those relating to Christian ministry and education, to the public. As your use of the ANSWERS IN CREATION and AIC marks is likely to cause confusion between your ministry and AiG, AiG requests you change your ministry name.

AiG is an internationally recognized Christian ministry dedicated to educational and ministerial goods and services. AiG publishes extensively, attends a multitude of conferences and conventions around the world, engages in media appearances, and actively participates in the Internet community to promote its Christian apologetics and mission. As you know, a substantial portion of AiG's ministry is directed to the doctrine of creation in Christianity. Our client has been using the marks ANSWERS IN GENESIS and AIG since at least 1994 to promote its ministry and related goods and services. Our client owns U.S. Trademark Registrations Nos. 2,024,397; 2,546,189; 2,918,926; 3,549,051 and 3,857,083 for the mark ANSWERS IN GENESIS in the United States, along with numerous trademark registrations around the world. AiG generates substantial revenues under the ANSWERS IN GENESIS and AIG marks and has expended considerable effort towards establishing goodwill and promoting consumer association with these names. Our client distributes many thousands of pieces of literature and other goods with and promoting the ANSWERS IN GENESIS and AIG marks throughout the world. AiG owns and operates the domain name www.answersinogenesis.org as an active website which attracts millions of visitors each year. AiG also owns and operates the internationally acclaimed Creation Museum in Petersburg, KY, USA, and is the driving force behind Ark Encounter, a new theme park set to open in 2014 featuring the events chronicled in the Old Testament. AiG is a participant in the world-wide Facebook community, with a page located at www.facebook.com/#!/AnswersInGenesis.

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The ANSWERS IN GENESIS and AIG marks are famous both nationally and internationally for AiG's ministerial goods and services. Our client's marks are strong and enjoy significant consumer association.

It has come to our attention that you are using the marks ANSWERS IN CREATION and AIC for Christian educational and ministerial services. You also operate a website at www.answersincreation.org where the focus of your ministry on creation and Christianity. Through your website, you solicit monetary donations and sell bumper stickers with the ANSWERS IN CREATION mark. You also use the ANSWERS IN CREATION and AIC marks on a Facebook page supporting your ministry, found here: www.facebook.com/pages/Answers-In-Creation/107904029230690?ref=ts.

Your use of ANSWERS IN CREATION and AIC is confusingly similar to AiG's ANSWERS IN GENESIS and AIG marks. Your ANSWERS IN CREATION mark differs in a single word from ANSWERS IN GENESIS. That single word, creation, is strongly associated with Genesis and with AiG's ministry. Similarly, your AIC mark differs in a single letter from AIG, and the two marks sound nearly identical. You are using the ANSWERS IN CREATION and AIC marks to offer the same services as AiG, namely Christian educational and ministerial services, and particularly those services related to teaching and ministering on creation. You are using these marks and offering your services through the same channels as AiG. As a result, consumers looking for AiG's Christian ministry services, to include those associated with creationism, may be confused or misdirected to your ministry.

The offering of identical goods and services under very similar trademarks to the public is likely to cause confusion that is not in the best interest of either ministry. In order to prevent such confusion, we request that you change the name of your ministry so that is not substantially similar to any of AiG's trademarks.

Thank you for your attention to this matter. We request the courtesy of your response within one month of the date of this letter.

Sincerely,



Anthony J. Biller

cc: John E. Pence, Esq.

AJB/ujs
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