



DOLAN LAW FIRM

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October 19, 2010

Jane Geddes
LPGA
SVP of Tournament Operations and Player Services
100 International Golf Drive
Daytona Beach, Florida 32124-1092
E-mail: qualifyingschool@lpga.com

Dear Ms. Geddes;

I am the attorney representing Ms. Lana Lawless in her lawsuit against the LPGA, CVS, the LDA, Remax, and Dicks Sporting Goods. I attach a file endorsed copy of the complaint for your edification.

I have yet to serve the lawsuit. On behalf of Ms. Lawless, I hereby request that you immediately announce that you will comply with California Law and change your unlawful policy of discriminating against transgender people in you're the LPGA. It is clear that your policy requiring that women be "born female" is not only out of sync with the trend in sports today (i.e., the International Olympic Committee (IOC) and the United States Golf Association (USGA)) it is illegal. As you operate qualifying tournaments, clinics, and major tour events such as the Dina Shore Classic and that which you just conducted at Blackhawk Country Club, you are violating the civil rights of Ms. Lawless and other transgender women in violation of California Law. It is clear that your conduct is not accidental as you specifically told Ms. Lawless, in June of 2010, that she could not even attend Qualifying School (Q School).

If you do not announce a change in your policy, in line with that adopted by the International Olympic Committee and/or the USGA, within 72 hours, i.e., by midnight Thursday October 21, 2010, we will proceed with service against your organization and the other related defendants. Rest assured, we will vigorously prosecute the action including an injunction against your organization engaging in activities in California. If you have not done so already, please check out my qualifications and track record by



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visiting my website www.cbdlaw.com or www.lgbt-lawyer.com. I assure you I am both capable and prepared to represent Ms. Lawless in a firm and ethical fashion.

If you announce a policy change that is in conformity with the IOC and/or USGA rules, within 72 hours, we will forestall the service of the complaint and enter into discussions with you about potential resolution of this dispute.

Below, I provide you with a summary of California Law which shows that your conduct is illegal.

I hope that you do the right thing and change your policies. If you don't, we will take all legal action to assure that you are not allowed to discriminate in California. I also will work with attorneys licensed in other states where transgender discrimination is illegal to prevent you from doing business in those states.

If you chose to continue with your policy of discrimination, please indicate whether you would prefer us to serve your attorneys with the summons and complaint or whether you prefer that we serve you and your organization personally.

Truly yours;

Christopher B. Dolan M.S.M., J.D.



California Civil Code § 51. Unruh Civil Rights Act; equal rights; business establishments; violation

- (a) This section shall be known, and may be cited, as the Unruh Civil Rights Act.
- (b) All persons within the jurisdiction of this state are free and equal, and no matter what their sex, race, color, religion, ancestry, national origin, disability, medical condition, marital status, or sexual orientation are entitled to the full and equal accommodations, advantages, facilities, privileges, or services in all business establishments of every kind whatsoever. . . .
- (e) . . . (4) “Sex” has the same meaning as defined in **subdivision (p) of Section 12926 of the Government Code.**

California Government Code § 12926(p);

- (p) “Sex” includes, but is not limited to, pregnancy, childbirth, or medical conditions related to pregnancy or childbirth. “Sex” also includes, but is not limited to, a person's gender, **as defined in Section 422.56 of the Penal Code.**

California Penal Code 422.56 Definitions;

- (c) “Gender” means sex, and includes a person's gender identity and gender related appearance and behavior whether or not stereotypically associated with the person's assigned sex at birth.