

**Daniel A. DiNardo
587 N. Ventu Park Rd. E302
Newbury Park, CA 91320**

February 19, 2007

**Sagebrush Cantina
23527 Calabasas Rd.
Calabasas, CA 91302
Attn: Robert McCord III, Owner**

via Certified Mail

RE: Repeated violations of the Unruh Civil Rights Act

Dear Mr. McCord,

I write you today on behalf of myself and no fewer than thirty other individuals who have been subjected to repeated violations of California Civil Code section 51, also known as the Unruh Civil Rights Act. These violations have been systematically applied by your management and security staff, upon myself and other male individuals who elect to wear a jacket or vest, bearing the West Coast Weasels embroidered pattern, into your place of business, the Sagebrush Cantina, located in Calabasas, California.

These violations have occurred over the course of 2006 and continue to occur in 2007. In total, the violations exceed several hundred in number, with frequency increasing at an alarming rate.

First, understand that the West Coast Weasels is nothing more than a loose social organization or "a drinking club with a motorcycle problem", as stated on its business cards and supplied to anybody with interest. The West Coast Weasels is not a "1%er club", a "patched" club or even a "motorcycle club". The West Coast Weasels do not wear "colors", nor do they do claim or wear a "patch" of any kind.

The West Coast Weasels do have jackets and vests embroidered with the facsimile of a weasel smoking a cigar in front of a "maltese cross" bearing the "West Coast Weasels" name in the same manner as "West Coast Choppers". Women and children wear these jackets and vests and they are available for purchase by the general public. This "pattern" or "graphic" is not copyrighted nor is it trademarked. It is currently used on clothing, business cards, a web site and a web-based discussion group. It will soon also be used by the Malibu Inn, promoting their "West Coast Weasels Special" menu item.

The West Coast Weasels does not have "rival clubs" nor does the organization exist to intimidate, mock or imitate any "motorcycle club". Many individuals who possess and wear jackets and vests bearing the West Coast Weasels pattern are in fact women and children, clearly not the hallmark of a "motorcycle club", outlaw or otherwise.

Moreover, the act of wearing jackets and vests decorated with the West Coast Weasels pattern is no different than that of individuals electing to wear a "Ford Racing Team" jacket or a Dodgers jacket, or even a shirt decorated with a political statement supporting our veterans of war.

The management/security staff at the Sagebrush Cantina prohibits men from wearing jackets or vests bearing the West Coast Weasels embroidered pattern into the establishment, under the threat of being banned or "86-ed". Furthermore, the prohibition is applied exclusively to male individuals, while female individuals wearing the very same jacket or vest are never approached.

This is an arbitrary and unlawful prohibition that serves no legitimate business purpose.

The prohibition has been systematically applied to male individuals, despite the fact that management and security staff has been repeatedly informed that the West Coast Weasels is not a motorcycle club; and that our right to wear said jackets and vests is protected under state and federal law.

Throughout the course of 2006 and thus far into 2007, with the exception of one day when temperatures fell below 40 degrees on the patio, all requests made by management or security staff to remove said jackets and vests have been promptly complied with. However, on Sunday, February 18, 2007, I was informed by security staff that the "rules" were well known by our group and that if we insist on being asked to remove our jackets or vests, then we will be "86-ed". I was approached less than fifteen minutes later by the manager, Charlie Halstead, who effectively repeated the above warning, though in harsher terms.

In other words, if any male individual is ever seen inside the establishment wearing a West Coast Weasels embroidered jacket or vest, he will be summarily ejected and permanently "86-ed".

After hearing manager Halstead deliver this news to me, I asked for a written copy of the "rules", a dress code or a policy regarding dress, as these "rules" seem to be a moving target and not uniformly applied. I was told, "No, nothing". Instead, I was again threatened to be "86-ed" by Mr. Halstead. When I attempted to leave a business card with him and requested to speak with the owner, I was again refused.

I think you can see from the elements above, and any attorney would agree, that these are clear violations of the Unruh Civil Rights Act. In fact, I believe each and every individual incident constitutes a separate violation. Capricious discrimination against a class of individuals based on gender and type of dress, which serves no legitimate business purpose, is arbitrary and unlawful.

As a business owner myself and member in good standing with the Thousand Oaks/Westlake Village Chamber of Commerce, I can assure you that I have no interest in unnecessarily pursuing a court action. However, I must insist that your establishment treat its clientele in a fair and legal manner. My hope is that once this matter has been brought to your attention, you will do what is necessary to remedy the current situation.

Please contact me at your earliest convenience so that we may discuss an appropriate direction. I can be reached by phone at 805-338-8105 or email at dandinardo@gmail.com.

Sincerely,

Daniel A. DiNardo