

September 20, 2005

COMPROMISE COMMUNICATION**VIA CERTIFIED U.S. MAIL**
PERSONAL AND CONFIDENTIAL

Dr. Aviel D. Rubin
ACCURATE Director
c/o Johns Hopkins University
Information Security Institute
3100 Wyman Park Drive
Wyman Park Building, 4th Floor
Baltimore, Maryland 21211

Dr. Daniel S. Wallach
ACCURATE Associate Director
c/o Rice University
3121 Duncan Hall
6100 Main Street
Houston, Texas 77005

Re: ACCURATE

Gentlemen:

The 2005 National Science Foundation ("NSF") research proposal for A Center For Correct, Usable, Reliable, Auditable and Transparent Elections ("ACCURATE") contains a substantial amount of my client's -- Dr. Rebecca Mercuri's -- original works of authorship and derivative works thereof. In addition, the "ACCURATE" acronym itself was coined by Dr. Mercuri, as evidenced by the "Accurate-Voting.org" website's very recent attribution to her. You did not request or receive permission to use any of Dr. Mercuri's works or acronym.

As you know, Dr. Mercuri played a key role in authoring 2002 and 2004 research proposals to the NSF regarding electronic voting systems, the latter of which Dr. Mercuri entitled "ACCURATE." You were members of Dr. Mercuri's 2004 research proposal team, but you apparently excluded her from your 2005 research proposal. Despite her exclusion, you chose to include Dr. Mercuri's works and her "ACCURATE" acronym in your proposal.

Consequently, you are hereby directed to: (1) Amend and resubmit your NSF research proposal to exclude Dr. Mercuri's original works of authorship, derivative works thereof and "ACCURATE" acronym, and provide evidence that you have done so; (2) Amend your domain name and website content to exclude Dr. Mercuri's acronym and personal name; and (3) Instruct all of the members of your team to discontinue use of Dr. Mercuri's works and acronym.

If you wish to continue to use the acronym and avoid the necessity of resubmitting your research proposal, please contact me within the next ten (10) days to discuss appropriate remuneration to Dr. Mercuri. I invite you to contact me at 603.647.2000 or RNW@Software-Law.com. Thank you very much.

Very truly yours,



Ronald N. Weikers