

COURT B-FILED
COURT OF COMMON PLEAS
2005 SEP 15 AM 9:21
MONTGOMERY COUNTY, OHIO



Patrick M. O'Neill (0062519)
Edward P. Akin (0074357)
Attorneys for Plaintiff, Stafford Jewelers, Inc.

COURT OF COMMON PLEAS
MONTGOMERY COUNTY, OHIO

STAFFORD JEWELERS, INC.
6295 CRITTENDEN DRIVE
CINCINNATI, OHIO 45244

Plaintiff,

V.

JOHN M. STAFFORD
d/b/a STAFFORD JEWELERS OF DAYTON
2555 MIAMISBURG-CENTERVILLE RD.
DAYTON, OHIO 45459

and

U.S. DIAMOND & GOLD JEWELERS, INC.
2008 MIAMISBURG-CENTERVILLE RD.
CENTERVILLE, OHIO 45459

Defendants.

CASE NO.:

JUDGE

05-7059

VERIFIED COMPLAINT

Plaintiff Stafford Jewelers, Inc., for its Complaint against Defendants John M. Stafford, d/b/a Stafford Jewelers of Dayton, and U.S. Diamond & Gold Jewelers, Inc., hereby states as follows:

1. Plaintiff Stafford Jewelers, Inc., ("Stafford Jewelers") is an Ohio Corporation, registration number 867503 with the Ohio Secretary of State, with its principal place of business in Cincinnati, Hamilton County, Ohio. (Ohio Secretary of State filings attached hereto as Exhibit "A").
2. Stafford Jewelers has been engaged in the retail jewelry business in the Greater Cincinnati area, with retail outlets in Cincinnati, Ohio and Florence, Kentucky since 1994.
3. Defendant John M. Stafford is a resident of Montgomery County, Ohio.

4. Defendant U.S. Diamond & Gold Jewelers, Inc., is an Ohio Corporation with its principal place of business located at 2008 Miamisburg-Centerville Road, Centerville, Montgomery County, Ohio 45459.
5. On information and belief, Defendant John Stafford registered Stafford Jewelers of Dayton as a trade name of Defendant U.S. Diamond & Gold Jewelers, Inc., with the Ohio Secretary of State on or about May 27, 2005. (Attached hereto as Exhibit "B".)
6. Over the previous eleven years, Stafford Jewelers has acquired significant good will and customer recognition of its name.
7. The combination of the surname "Stafford" with the term "Jewelers" has acquired a secondary meaning within the Southwestern Ohio and Northern Kentucky market for retail jewelry.
8. On information and belief, Defendants have been using the Stafford Jewelers name in connection with a retail jewelry business in Dayton, Ohio.
9. Defendants' use of the Stafford Jewelers name in intrastate and interstate commerce has caused confusion in the marketplace, channeled good will which should properly accrue to Stafford Jewelers, Inc. to Defendants, and created credit reporting problems for Stafford Jewelers.
10. Stafford Jewelers demanded, by certified mail letter tendered by and through counsel, that Defendants immediately cease using the name Stafford Jewelers and promptly notify any creditors and/or customers that they are not affiliated with Stafford Jewelers, Inc. (a copy of the letter with return receipt are attached hereto as Exhibit "C").
11. Defendants have so far refused and failed to comply with this demand.

COUNT ONE
UNFAIR COMPETITION UNDER THE LANHAM ACT

12. Stafford Jewelers incorporates by reference Paragraphs 1 through 11 of its Complaint as if fully rewritten herein.

as if fully rewritten herein.

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13. Defendants are using the Stafford Jewelers trade name in interstate commerce to promote their goods and services in such a way as to deceive and mislead the consuming public. Specifically, Defendants are using the precise name which Stafford Jewelers has registered as the name of its corporation with the Ohio Secretary of State. Consequently, Defendants' actions are calculated to mislead and deceive the consuming public and creditors into believing that they are affiliated with Stafford Jewelers, when in fact there is no legal or business connection between Stafford Jewelers and either of the Defendants.
14. Defendants are misusing the Stafford Jewelers name in interstate commerce to promote their goods and services, and falsely identify the origin or falsely describe their goods and services in a manner which is likely to cause confusion, mistake and/or deception as to the affiliation, connection or association, or the origins of their goods and services and those of Stafford Jewelers.
15. Defendants' conduct constitutes an unfair trade practice and unfair competition in violation of the Lanham Act, 15 U.S.C. §1125, *et seq.*
16. Defendants' acts of unfair competition and unfair trade practices against Stafford Jewelers have caused and will, unless enjoined by this Court, continue to cause Stafford Jewelers to suffer damages in excess of \$25,000.00, including without limitation, loss of good will, loss of potential customers, confusion among creditors and credit reporting agencies and other damages to be proven at trial.

COUNT TWO
UNFAIR COMPETITION UNDER OHIO LAW

17. Stafford Jewelers incorporates by reference Paragraphs 1 through 16 of its Complaint as if fully rewritten herein.

18. Stafford Jewelers currently has a valid and subsisting trade name recognized in the Greater Cincinnati, Northern Kentucky and Southwestern Ohio markets for its goods and services.
19. Stafford Jewelers has invested money in advertising and in otherwise promoting its goods, services and retail outlets.
20. Stafford Jewelers' trade name is the means by which its goods and services are identified as being affiliated, associated with and sold by Stafford Jewelers.
21. Though advertising in various mediums and years of operating its business, Stafford Jewelers has acquired and preserved valuable consumer, supplier and creditor good will in connection with its business, and this good will is symbolized by and associated with its trade name.
22. Defendants have neither sought nor obtained Stafford Jewelers' permission to use the Stafford Jewelers trade name or any derivation or imitation thereof in connection with their business, goods, services or retail outlets in the Dayton, Ohio area or anywhere else.
23. Defendants have wrongfully adopted or caused to be adopted a trade name which bears intentional and confusing similarity to Stafford Jewelers' trade name.
24. Defendants' continuing use of this confusingly similar trade name in advertising, promotion and sale of their goods and services is likely to deceive consumers, suppliers, creditors and credit reporting agencies as to the true identity of their business, insofar as consumers, suppliers, creditors and credit reporting agencies are likely to mistakenly believe that Defendants' businesses have a legitimate connection or affiliation with Stafford Jewelers.

Stafford Jewelers.

25. Defendants' infringement of Stafford Jewelers' trade name constitutes an unfair competition, by tending to falsely associate the Defendants' business entity and their goods and services with Stafford Jewelers, in violation of Ohio law.

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26. Defendants' act of false designation of origin have caused and will continue to cause substantial and irreparable injury to Stafford Jewelers.
 27. Stafford Jewelers is entitled to injunctive relief, including a Temporary Restraining Order and Permanent Injunction against Defendants and money damages adequate to compensate it for Defendants' infringing use.

COUNT THREE
VIOLATIONS OF OHIO DECEPTIVE TRADE PRACTICES ACT

28. Stafford Jewelers incorporates by reference Paragraphs 1 through 27 of its Complaint as if fully rewritten herein.
29. Defendants' conduct described above amounts to passing off their goods and services as those of Stafford Jewelers, in violation of O.R.C. §4165.02(A)(1).
30. Defendants' conduct described above causes a likelihood of confusion or misunderstanding as to the affiliation, connection or association with, or certification by Stafford Jewelers of Defendants' goods and services, in violation of O.R.C. §4165.02(A)(3).
31. On information and belief, Defendants have willfully persisted in the above-described trade practices despite knowing them to be deceptive.
32. Defendants' deceptive trade practices have damaged and are likely to continue to damage Stafford Jewelers by causing confusion among the consuming public, creditors, suppliers and credit reporting agencies and irreparably injure the value of the good will of the Stafford Jewelers trade name.
33. Defendant John Stafford's having refused a certified mail demand to cease and desist

33. Defendant John Stafford's having refused a certified mail demand to cease and desist these practices, it has become readily apparent that Defendants will persist in their deceptive trade practices unless enjoined by the Court. Stafford Jewelers has no adequate remedy at law in that the amount of its damages are difficult to ascertain with specificity, and unless enjoined by the Court, such damages will be compounded on a

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daily basis. Ohio Revised Code §4165.03(A) specifically provides for injunctive relief in such instances.

34. As a result of Defendants' deceptive trade practices, Stafford Jewelers has incurred and continues to incur money damages in amounts to be proven specifically at trial, including without limitation, diminution of good will associated with its trade name. Stafford Jewelers is also entitled to recover its attorney's fees incurred herein, pursuant to Ohio Revised Code §4165.03(A)(2)(B).

COUNT FOUR
COMMON LAW TRADE MARK INFRINGEMENT

35. Stafford Jewelers incorporates by reference Paragraphs 1 through 34 of its Complaint as if fully rewritten herein.
36. Defendants' conduct described above infringes Stafford Jewelers' rights in its "Stafford Jewelers, Inc." trade name, thereby violating Ohio Common Law.
37. Defendants' infringement of Stafford Jewelers' trade name has caused and continues to cause irreparable injury to the value and good will associated with such trade name, as well as to Stafford Jewelers' business, good will and reputation with consumers, suppliers, distributors, creditors and credit reporting agencies. If not enjoined by the Court, Defendants' infringing actions will continue.
38. Stafford Jewelers has no adequate remedy at law, in that the amount of its damages are difficult to ascertain with specificity. Moreover, unless the Court enjoins Defendants'

difficult to ascertain with specificity. Moreover, unless the Court enjoins Defendants' infringing conduct, such damages will be compounded and exacerbated daily.

39. Accordingly, Stafford Jewelers prays herein for injunctive relief from this Court, and has separately moved for a Temporary Restraining Order.
40. As a result of Defendants' infringing conduct, Stafford Jewelers has incurred and

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continues to incur money damages in an amount to be proven specifically at trial.

COUNT FIVE
PRAYER FOR TEMPORARY RESTRAINING ORDER

41. Stafford Jewelers incorporates by reference Paragraphs 1 through 40 of its Complaint as if fully rewritten herein.
42. For reasons set forth above, Defendants' continued, willful and deceptive infringement of Stafford Jewelers' valid, subsisting and duly registered trade name threatens great and irreparable injury to Stafford Jewelers if not restrained by this Court.
43. Defendants have failed and refused to cease and desist these practices, ignoring certified mail demands from Stafford Jewelers' legal counsel. (See Exhibit "C", *supra*.)
44. Money damages will not suffice to remedy the present loss and diminution and threatened future loss and diminution of valuable goodwill associated with Stafford Jewelers' trade name.
45. Money damages will not suffice to remedy the imminent threat of consumer confusion as to the source of Defendants' and Stafford Jewelers' respective goods and services which is threatened by Defendants' deliberate, willful and continuing misappropriation of Stafford Jewelers' trade name.
46. A Temporary Restraining Order is necessary under these circumstances to prevent any

46. A Temporary Restraining Order is necessary under these circumstances to prevent any additional damage to the valuable good will associated with Stafford Jewelers' trade name.
47. Under these circumstances, this Court has authority pursuant to Ohio Rule of Civil Procedure 65(A) and Ohio Revised Code §2727.02 to issue a Temporary Restraining Order requiring Defendants to cease and desist from any further use of Stafford Jewelers' trade name and to take appropriate steps to notify the Ohio Secretary of State to remove any formal association of the Stafford Jewelers name with their business

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entities.

WHEREFORE, Plaintiff Stafford Jewelers, Inc., hereby demands that this Court enter judgment in its favor against Defendants John M. Stafford, d/b/a Stafford Jewelers of Dayton, and U.S. Diamond & Gold Jewelers, Inc., as follows:

- I. With respect to Counts I - IV of the Complaint, that this Court render a judgment in favor of Stafford Jewelers and award money damages in an amount exceeding \$25,000.00, to be proven specifically at trial;
- II. With respect to Counts I - IV, and as specifically prayed for in Count V of the Complaint and in Stafford Jewelers' simultaneously filed Motion for Temporary Restraining Order, that this Court issue such Temporary Restraining Order requiring Defendants to cease and desist using "Stafford Jewelers" as part of their trade name, and make appropriate filings with the Ohio Secretary of State to retract such official use;
- III. That the Court enter preliminary and permanent injunctions, after notice and opportunity to be heard by Defendants, enjoining Defendants' unauthorized use of "Stafford Jewelers" in their trade name;
- IV. An award of treble damages and attorney fees to the extent authorized by statutory

- IV. An award of treble damages and attorney fees to the extent authorized by statutory applicable federal or Ohio law, including without limitation, 15 U.S.C. §1117(a) and/or Ohio Revised Code §4165.03.
- V. Any other such relief as the Court shall deem just and proper.

Respectfully submitted,

ARONOFF, ROSEN & HUNT

Patrick M. O'Neill (0062519)
 Edward P. Akin (0074357)
 2200 U.S. Bank Tower, 425 Walnut Street
 Cincinnati, Ohio 45202
 Telephone: (513) 241-0400
 Facsimile: (513) 241-2877
Trial Attorney for Plaintiff, Stafford Jewelers, Inc.

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VERIFICATION

STATE OF OHIO)
) SS:
 COUNTY OF HAMILTON)

James Stafford, being first duly sworn and cautioned, states that the foregoing factual allegations are true and accurate to the best of his personal knowledge and belief.

James Stafford

Sworn to before me and subscribed
in my presence this 4 day of September, 2005.

Notary Public



CHRISTINE J. PATTERSON
Notary Public

My Commission Expires:



CHRISTINE J. PATTERSON
Notary Public, State of Ohio
My Commission Expires 01-06-07

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BUSINESS FILING DETAILS



Business Filing Information

Business Name	Filing Type	Filing Date	Doc Id <i>Click for Image !</i>	Doc Id <i>Click for Approval Cert!</i>	Additional Filing Type Info
STAFFORD JEWELERS, INC.	Domestic Articles/For Profit	Mar 16 1994	9478_0746	9478_0746	

Total Row Count in Report- 1
Row(s) 1 - 1

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Agent Contact Information

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Agent Contact Information

Agent Name	Agent Address	City	State	Zip	Effective Date	Contact Status
James R Stafford, Jr	6295 Crittenden Dr	Cincinnati	Ohio	45244	16-MAR-94	Active

Total Row Count in Report- 1
Row(s) 1 - 1

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BUSINESS FILINGS DETAILS

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Business Filing Information

Business Name	Filing Type	Filing Date	Doc Id <i>Click for Image 1</i>	Doc Id <i>Click for Approval Cert</i>	Additional Filing Type Info
STAFFORD JEWELERS OF DAYTON	Trade Name/Original Filing	May 27 2005	200515100200	200515100200	

Total Row Count in Report- 1
Row(s) 1 - 1

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http://serform2.sos.state.oh.us/pls/porthope/DEV.SAP_RPT_BUS_FILING_DET.SHOW?p_... 9/13/05

Doc ID --> 200515100200



DATE	DOCUMENT ID	DESCRIPTION	FILING	EXPED	PENALTY	CERT	COPY
05/31/2005	200515100200	TRADE NAME/ORIGINAL FILING (RNO)	50.00	100.00	.00	.00	.00

Receipt

This is not a bill. Please do not remit payment.

STAFFORD JEWELERS OF DAYTON
JOHN STAFFORD
2008 MIAMISBURG-CENTERVILLE RD
CENTERVILLE, OH 45459

**STATE OF OHIO
CERTIFICATE**

Ohio Secretary of State, J. Kenneth Blackwell

C E R T I F I C A T E
Ohio Secretary of State, J. Kenneth Blackwell

1546285

It is hereby certified that the Secretary of State of Ohio has custody of the business records for
STAFFORD JEWELERS OF DAYTON
and, that said business records show the filing and recording of:

Document(s)	Document No(s):
TRADE NAME/ORIGINAL FILING	200515100200
Date of First Use: 04/10/1986	U.S. DIAMOND & GOLD JEWELERS, INC.
Expiration Date: 05/27/2010	2008 MIAMISBURG CENTERVILLE RD CENTERVILLE, OH 45459



United States of America
State of Ohio
Office of the Secretary of State

Witness my hand and the seal of the Secretary of State at Columbus, Ohio this 27th day of May, A.D. 2005.

J. Kenneth Blackwell
Ohio Secretary of State

DocID → 200515100200



Prescribed by **J. Kenneth Blackwell**

Ohio Secretary of State
Central Ohio: (614) 466-3910
Toll Free: 1-877-SOS-FILE (1-877-767-3453)

www.state.oh.us/sos
e-mail: busserv@sos.state.oh.us

Expedite this Form: (Select One)	
Mail Form to one of the Following:	
<input checked="" type="radio"/> Yes	PO Box 1380 Columbus, OH 43216 <small>** Requires an additional fee of \$100 **</small>
<input type="radio"/> No	PO Box 670 Columbus, OH 43216

NAME REGISTRATION
(For Domestic/Foreign Profit or Non-Profit)
Filing Fee \$50.00

THE UNDERSIGNED HEREBY STATES THE FOLLOWING:

(CHECK ONLY ONE (1) BOX)

(1) <input checked="" type="checkbox"/> Trade Name (187-RND) Date of first use: 4/10/1986 MMDDYYYY	(2) <input type="checkbox"/> Fictitious Name (180-NFO)	(3) Name Reservation (180-NRC) <input type="checkbox"/> Original <input type="checkbox"/> Renewal Registration No.
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Complete the information in this section if box (1) or (2) is checked.

The exact name being registered or reported is Stafford Jewelers c/ Dayton

The Registrant is (Check Appropriate Box)

Individual

Limited Partnership: Reg. No. _____

Ohio Limited Liability Co., Reg. No. _____

Ohio Corporation, Charter No. 875539

General Partnership

Other _____

Foreign Corporation incorporated in the state of _____ holding Ohio license no. _____

Unincorporated Association

Foreign Limited Liability Co. holding Ohio Reg. No. _____ organized in the state of _____

The name of the registrant designated above is U. S. Diamond & Gold Jewelers, Inc

NOTE: Where the registrant is a partnership, the name of the partnership must appear on this line. If the registrant is a foreign corporation licensed in Ohio under an assumed name, both the assumed name and actual corporate title of such corporation must appear on this line.

The business address of the registrant is 2008 Miamisburg Centerville Rd.

(Street) **NOTE: P.O. Box Addresses are NOT acceptable.**

Centerville Montgomery Ohio 45450

(City) (County) (State) (Zip Code)

Complete the information in this section if box (1) or (2) is checked Cont.

Complete only if registrant is a general partnership

NAME OF ALL GENERAL PARTNERS _____ COMPLETE RESIDENTIAL ADDRESSES (including zip code) _____

NOTE: Pursuant to OAG 89-081, if a general partner is a foreign (out-of-state) corporation, it must be licensed to transact business in Ohio; if a general partner is a foreign corporation licensed in Ohio under an assumed name, please note both the assumed name and actual corporate title of such general partner.

The nature of the business conducted by the registrant under the trade or fictitious name is (please be specific)

Retail sale of Jewelry and related items

Retail sale of Jewelry and related items

Complete the information in this section if box (3) is checked.

- Please reserve the name listed below. (only one name per form)
- Please reserve the first name available in the order of my preference.

I understand that I am not guaranteed the reservation UNTIL I RECEIVE WRITTEN CONFIRMATION FROM THE SECRETARY OF STATE'S OFFICE STATING THAT THE NAME HAS BEEN REGISTERED TO ME

The name reservation is valid for a period of 180 days.

(First Choice)

(Second Choice)

(Third Choice)

(Applicant) (Print Name)

(Address)

(City, State and Zip Code)

REQUIRED
Must be authenticated (signed)
by an authorized representative
(See Instructions)


Authorized Representative

May 27, 2005
Date


Authorized Representative

Date



Agent Contact Information

Agent Name	Agent Address	City	State	Zip	Effective Date	Contact Status
U.S. Diamond & Gold Jewelers, Inc.	2008 Miamisburg Centerville Rd	Centerville	Ohio	45459	27-MAY-05	Active

Total Row Count in Report- 1
Row(s) 1 - 1

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Stanley J. Ironoff
Stephen P. Hunt
Gregory Mohr
Mark W. Pisen
 501 ...

Aronoff, Pisen & Hunt
A Legal Professional Association
 2206 U.S. Bank Tower
 425 Walnut Street

Irwin J. Ironoff
 (1905-1987)

Irving H. Pisen

Mark W. Poiré
Edmond P. DeGregorio
Richard A. Paol
Patrick M. O'Neill
Valerie L. Van Valkenburg
Tina M. Donnelly
Edward P. Akin
Christine J. Patterson
**Also admitted in Kentucky*

425 Walnut Street
Cincinnati, Ohio 45202-3954
Telephone (513) 241-0400
Telecopier (513) 241-2877

www.ohioattorlaw.com

Irving H. Posen
of Counsel

Columbus, Ohio Office
85 East Gay Street
Eleventh Floor
Columbus, Ohio 43215
Telephone (614) 221-8120
Telecopier (614) 221-0289

August 19, 2005

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

John M. Stafford
Stafford Jewelers of Dayton
2555 Miamisburg-Centerville Road
Dayton, OH 45459

RE: STAFFORD JEWELERS

Dear Mr. Stafford:

We represent Stafford Jewelers, Inc. It has come to our attention that you are unlawfully converting use of the name "Stafford Jewelers" for your benefit. The name "Stafford Jewelers" is, as you may be aware, owned by James R. Stafford, Jr. Stafford Jewelers, Inc. was incorporated in March of 1994, significantly pre-dating your current use of Stafford Jewelers.

The use of the name Stafford Jewelers by you has caused confusion in the marketplace, credit reporting problems for Stafford Jewelers, as well as your unlawful use and benefit of Stafford Jewelers' good will. This is to advise you to immediately cease and desist from using, directly or indirectly, the name Stafford Jewelers. In addition, you are required to notify any creditors and/or customers that you are not affiliated with Stafford Jewelers, Inc.



John M. Stafford
August 19, 2005

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August 19, 2005

Page 2

Your failure to cease and desist from using the name Stafford Jewelers within twenty-four (24) hours from the date of receipt of this letter, will result in enforcement by Stafford Jewelers, Inc., of its ownership of Stafford Jewelers as its trade name, as well as damage to its reputation and good will.

Very truly yours,

ARONOFF, ROSEN & HUNT



Richard A. Paolo

RAP/rmw

S:\19015\rmw\C\Letters\RAP\Stafford\Stafford - John - 8-19-05.doc

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece.

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
[Handwritten Signature] Addressee

B. Received by (Printed Name) Date of Delivery
[Handwritten Name] *[Handwritten Date]*

so that we can return the card to you.
 ■ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 John M. Stafford
 Stafford Jewelers of Dayton
 2555 Miamisburg-Centerville Rd
 Dayton, OH 45459

Addressee
 B. Received by (Printed Name) *Shannon Jeffers* C. Date of Delivery *23 AUG 05*
 D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
 3. Article Description
 PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540
 9501 0000 0090 4452

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

DAYTON OH 45459

Postage	\$ 0.37
Certified Fee	\$2.30
Return Receipt Fee (Endorsement Required)	\$1.75
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$ 4.42

Postmark: CINCINNATI OH 45201 CITY STA AUG 22 2005

Sent To: John M. Stafford
 Stafford Jewelers of Dayton
 2555 Miamisburg-Centerville Rd.
 Dayton, OH 45459

PS Form 3800, June 2002 See Reverse for Instructions

USPS QUEEN CITY FINANCE UNIT
 CINCINNATI, Ohio
 452029998
 3816070202-0095
 (800)275-8777 02:51:14 PM
 09/22/2005

Product Description	Sale Qty	Receipt Unit	Price	Final Price
Other				
DAVTON OH 45459				
First-Class			\$0.37	
Return Receipt (Green Card)			\$1.75	
Certified			\$2.30	
Label Serial #: 70040/50000010904452				
Issue FVI:			\$4.42	
Total:				\$4.42
Paid by:				
Personal Check				\$4.42

Bill #: 1000501616865
 Clerk: 04

All sales final on stamps and postage.
 Refunds for guaranteed services only.
 Thank you for your business.
 Customer Copy