



October 23, 2018

Art Jones for Congressman  
P.O. Box 598  
Lyons, Illinois 60534

Mr. Jones or Art Jones for Congressman campaign manager:

I am writing on behalf of the Arab American Institute Foundation (“AAIF”) regarding Art Jones for Congressman’s use of AAIF’s “YallaVote” logo in upper lefthand corner of a campaign advertisement appearing in the October 15, 2018 edition of Future newspaper (“Advertisement”), photograph attached.

AAIF is the creator and exclusive owner of the YallaVote name and logo. AAIF has used both the term “YallaVote” and the YallaVote logo which appears in the Advertisement exclusively and continuously since 1998. AAIF has continuously conducted the YallaVote campaigns, and has used the “YallaVote” logo, in Illinois since 1998.

YallaVote is a grassroots and nonpartisan voter mobilization and education campaign. Neither the YallaVote campaign, nor the mark’s owner, AAIF, endorse political candidates for elected office or coordinate with partisan campaigns. The logo has appeared on AAIF promotional material, clothing, election protection resources, buttons, stickers, and other accessories, both for educational outreach and fundraising purposes.

As Illinois has one of the largest populations of Arab Americans in the country, the state of Illinois is an important market for AAIF’s YallaVote efforts, and the campaign’s reputation in Illinois is central to the campaign’s continued success. Therefore, AAIF has valuable intellectual property rights over the “YallaVote” logo.

The Advertisement violates state and federal law in five ways:

1. The Advertisement constitutes a usage of exclusive intellectual property without consent or license.
2. Because YallaVote is a nonpartisan voter engagement campaign, the use of the logo by the political campaign for a particular candidate within the same geographical market presents a high likelihood for voter confusion.
3. The Advertisement implies that YallaVote, and in turn AAIF, is coordinating with the Art Jones for Congressman campaign, which is untrue. AAIF’s nonprofit status under Section 501(c)(3) of Internal Revenue Code prohibits AAIF or YallaVote from endorsing or coordinating with political campaigns. AAIF does not endorse or coordinate with Art Jones

for Congressman or any other campaign for candidates running for elected office, and assertions to the contrary constitute fraud.

4. AAIF explicitly rejects any association with the Advertisement's exploitation of opposition to U.S. support of Israel to advance an intolerant, homophobic, and bigoted agenda. AAIF considers the implied association with the Advertisement and the Art Jones for Congressman campaign more broadly as violative of AAIF's reputation as an inclusive civic organization. AAIF further rejects the use of this Advertisement as part of any attempt to target Arab American voters and divide Americans for political advantage.
5. The Advertisement does not "clearly state that the communication has been paid for by" the candidate's campaign as required under federal campaign finance law, 11 CFR 110.11. The Advertisement's provided text, "Printed as a public service by," is a clear and deliberate attempt to confuse voters.

In sum, AAIF has engaged in actual use of the mark in question, and nonconsensual, unlicensed use by Art Jones for Congressman will confuse voters and harm the reputation of AAIF. In Illinois, common law provides protection for the owners of intellectual property, availing owners to injunctive relief, punitive damages, attorney's fees, and recovery for reputational damages. As such, AAIF maintains all intellectual property rights and will not hesitate to initiate legal actions to protect those rights under the law of the State of Illinois.

**Therefore, AAIF demands that the Art Jones for Congressman campaign:**

1. **IMMEDIATELY** cease and desist the misuse of the YallaVote name or logo in any advertisements, promotional materials, election website, or any other medium where it may have appeared, and
2. **WITHIN FIVE (5) BUSINESS DAYS** submit a request to Future newspaper for a printing of an error note in the next edition asserting that neither AAIF nor the YallaVote campaign endorse or coordinate with the Art Jones for Congressman campaign or any other political campaign for elected office.

If AAIF does not receive a compliant response to this letter within TEN (10) BUSINESS DAYS, AAIF will begin to initiate legal proceedings against the Art Jones for Congressman campaign. As the Advertisement was placed only twenty two (22) days ahead of Election Day and was brought to the attention of AAIF merely three (3) days ago, IMMEDIATE ACTION is required to maintain the integrity of our elections.

Respectfully,



Ryan J. Suto, Esq.\*  
Government Relations Manager

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\* Barred in Washington, D.C. Bar number: 1601238