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October 23, 2015

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Mr. Anel Montes
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Hawaii Republican Assembly
P.O. Box 2567
Ewa Beach, HI 96706

Re: Infringement of Trademark/Tradenname Rights of Hawaii Republican Party

Dear Sirs:

This law firm represents the Hawaii Republican Party in connection with enforcement of its tradenname and mark rights. Your recent unauthorized uses of the names "Republican Wing of the Republican Party", "the Hawaii Republican Assembly", "Hawaii Republican Action" and the Republican Party "Elephant" violate the Hawaii Republican Party's trademark and tradenname rights because they create, and are likely to create, confusion in the public mind as to the source and identity of such communications. This letter constitutes the Hawaii Republican Party's demand that you cease and desist any and all use of these names/marks pursuant to the federal trademark law (the Lanham Act, 15 U.S.C. §1051 *et seq.*), the Hawaii state trademark law (Hawaii Revised Statutes Chapter 482), and the common law. You should immediately forward this letter to your attorney.

The Hawaii Republican Party is a longstanding qualified political party under Hawaii Revised Statutes §11-61, and as such is qualified for 'election ballot purposes' within the meaning of Hawai'i Revised Statutes §11-62, and is subject to the requirements of the various Hawaii statutes regulating elections. It has for many decades used the tradenames and marks "Hawaii Republican Party", "Republican Party of Hawaii" and the Republican Party "Elephant" in connection with its public election activities (both primary and general), fundraising solicitation and collection, public meetings and advocacy, press releases, newsletters, and other

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organizational and informational activities on behalf of its members. As a result of these efforts over many years, these names and marks have become associated in the public mind with the Hawaii Republican Party. Both the general public and the State of Hawaii itself recognize the Hawaii Republican Party as an established and longstanding political party in Hawaii.

Recently, the Hawaii Republican Party became aware of your unauthorized use of the names "Republican Wing of the Republican Party", "Hawaii Republican Assembly", "Hawaii Republican Action" and the Republican Party "Elephant". Your use of these names/marks -- which clearly mimic the established names/marks of the Hawaii Republican Party -- creates a likelihood of confusion in the minds of the public. Under both federal and Hawaii state law, trademark infringement occurs when someone utilizes a tradename or mark that creates a likelihood of consumer confusion.

Your activities appear to be taking place in the same public sphere or "market" as those of the Hawaii Republican Party. Indeed, your activities appear to not only be competing for economic benefits including donations, in some cases they attempt to actively obstruct contributions to the Hawaii Republican Party.

As a result of your unauthorized and improper use of the names "Republican Wing of the Republican Party", "Hawaii Republican Assembly", "Hawaii Republican Action" and the Republican Party "Elephant", the Hawaii Republican Party has already been advised of several instances of actual confusion, which presumably represents a small portion of those who have been confused but have not taken the time and effort to contact the Hawaii Republican Party in order to report the confusion caused by your use of these names/marks.

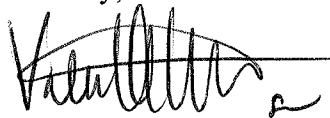
If you do not ***cease and desist*** from further use of these names/marks, the Hawaii Republican Party will proceed with legal action against you, and in that lawsuit it will pursue all available remedies which may include (without limitation): (1) preliminary and permanent injunctions; (2) monetary damages; (3) disgorging of any profits you have realized through your use of these names/marks; (4) reimbursement of attorney fees required to prosecute the lawsuit against you; and (5) monetary damages for damage to Hawaii Republican Party's goodwill in the market.

However, this will hopefully be unnecessary. You can avoid legal action by immediately ***ceasing and desisting*** from any and all promotion, marketing, advertising or other use of the names "Republican Wing of the Republican Party", "Hawaii Republican Assembly", "Hawaii Republican Action" and use of the Republican Party "Elephant", and from any other infringing activity regarding use of these names/marks. To indicate your agreement, please execute a copy of the attached Acknowledgment, and return it to me by October 31, 2015.

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We recommend you consult with an attorney regarding these matters. If you have any questions, please have your attorney contact me. Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael A. Lilly", with a stylized flourish at the end.

Michael A. Lilly

MAL/df

Encl.

Cc: Hawaii Republican Party

Acknowledgment

I, Anel Montes, personally and on behalf of the Hawaii Republican Assembly, agree to immediately cease and desist from any and all further use of the names/marks “Hawaii Republican Assembly”, “Hawaii Republican Action”, “Republican Wing of the Republican Party”, and the Republican Party “Elephant”.

By: _____

Anel Montes

Individually and on behalf of the Hawaii Republican Assembly

Dated: October __, 2015