



2121 Eisenhower Avenue, Suite 608
Alexandria, Virginia 22314

David Warrington
(703) 574-1206
DWarrington@dhillonlaw.com

August 6, 2024

VIA EMAIL

Scott Pio
Chairman
Loudoun County Republican Party
P.O. Box 547
Leesburg, VA 20178
scott@scottpio.com

**RE: Cease and Desist Your Unauthorized Use of President Trump's Name,
Image, and Likeness**

Dear Mr. Pio:

As you know, our firm represents Donald J. Trump for President 2024, Inc. (the "Campaign"). Our partner, Jonathan Shaw, spoke with you on July 14, 2024, the day after the assassination attempt on President Trump. That call was prompted because it came to the Campaign's attention that less than twenty-four hours after an assassin tried to take President Trump's life you were using the assassination attempt to raise money. Your attempt to capitalize on the assassination attempt of President Trump was in extremely poor taste. Mr. Shaw called you as a courtesy to ask you to cease and desist from this ghoulis activity. You agreed to stop fundraising off of the assassination attempt and further agreed to stop any merchandising based on the assassination attempt.



Despite your commitment, we are aware that you are now selling President Trump-themed merchandise—using a photograph of President Trump taken shortly after the assassin's bullet nearly took his life. You are selling this merchandise through the Loudoun County GOP's store and doing so without the Campaign's permission.

In fact, your sale of bootleg Trump merchandise comes in direct defiance of the Campaign's polite requests to stop misappropriating President Trump's name, image, and likeness and to stop trying to profit off of the assassination attempt. Despite your commitment to stop merchandizing off the attempt on President Trump's life you continue to do precisely that. It is no defense to assert "the Campaign does it, so I can too." Make no mistake: you cannot, and we are willing to make that painfully clear to you in court.

Your stubborn insistence on defying the Campaign by unlawfully using President Trump's name and image violates Virginia law (Va. Code § 8.01-40) and exposes you to liability to the Campaign and to President Trump personally. Because of your direct knowledge that your unauthorized merchandizing is forbidden by the Campaign, you are liable for punitive damages as well as all other damages you have caused the Campaign and President Trump.

Immediately cease and desist from all unauthorized use of President Trump's name and likeness or we will pursue all claims against you. It will hurt.

It is in your interest to comply and avoid further escalation. You do not want to make us ask you again. We expect confirmation that you will comply by August 9, 2024.

Sincerely,

A handwritten signature in black ink, appearing to read 'DAW', with a stylized flourish at the end.

David A. Warrington

General Counsel

Donald J. Trump for President 2024, Inc.