

LAW OFFICE OF JOHN FOGARTY, JR.  
4043 North Ravenswood, Suite #226  
Chicago, IL 60613  
(773) 549-2647 (phone)  
(773) 681-7147 (fax)  
www.fogartylawoffice.com

February 26, 2014

Via e-mail and U.S. Mail

Indian Americans For Freedom  
Attn: Mr. Shalli Kumar  
363 St. Paul Boulevard  
Carol Stream, IL 60188

**Re: Cessation of publication of [www.larrykaifesh4congress.com](http://www.larrykaifesh4congress.com)**

Dear Mr. Kumar:

Please be advised that I represent Larry Kaifesh, Republican candidate for Congress in the Eighth Congressional District.

This letter is in particular regard to the Indian Americans For Freedom's ("IAFF") use of the negative, misleading campaign website, [www.larrykaifesh4congress.com](http://www.larrykaifesh4congress.com) as a means to deceptively attack Larry Kaifesh ("the Website"). Without a doubt, the Website plainly infringes the copyright of the Kaifesh campaign website, and contains false information deliberately intended to mislead 8<sup>th</sup> District voters and to defame Larry Kaifesh's reputation.

**1. Copyright Infringement.** Most basically, the Website is obviously intentionally designed to confuse and mislead voters, as the Website's main page is almost an exact replica of Larry Kaifesh's official campaign website, [www.kaifeshforcongress.com](http://www.kaifeshforcongress.com). At a minimum, your Website violates the Kaifesh campaign's copyrighted material, for which we will pursue you to the fullest extent of the law. Moreover, the Kaifesh campaign has received numerous complaints about the mis-appropriation of the official website for your group's underhanded purpose. This is a particularly underhanded tactic in what appears to be an overt, coordinated attempt by IAFF to smear Mr. Kaifesh, and it has no place in honest political discourse.

**2. Defamatory Statements.** Among the many additional issues presented by the Website are the defamatory statements contained on its pages. For instance, the Website lodges the outrageous, false claim that Larry Kaifesh's hobbies include "targeting ethnic minorities." The Website supports this claim with a purported statement falsely alleged to have been made by the State Board of Elections. According to the Website, "85% of all Indian Americans petitions were challenged, 83% of Hispanic American signatures were challenged and most were overruled." This claim is simply false, as is the supposed "source" reference to the State Board of Elections, and **we challenge Indian Americans For Freedom to show us where, at any**

Indian Americans For Freedom  
February 26, 2014  
Page 2

**time, such a statement was ever made.** You cannot, because the simple fact is that this claim is a complete fabrication, and false on its face.

The Website further claims that Larry Kaifesh has been “running for Congress all over the United States.” This claim is simply false, and **we again challenge Indian Americans For Freedom to show us where, at any time, Larry Kaifesh has ever before run for Congress.** This assertion of fact is also completely fabricated, and completely untrue.

These and the other false statements, deceptive practices and copyright infringement subject IAFF to legal liability. Accordingly, we demand that you immediately take down the Website.

Sincerely,

John G. Fogarty, Jr.

cc: Larry Kaifesh