



May 14, 2026

VIA ELECTRONIC MAIL AND U.S. MAIL

Assemblymember Carl DeMaio
Principal Officer, Reform California Voter Guide
PO Box 27227
San Diego CA 92198
carl@carldemaio.com

Re: Cease and Desist Demand: Unlawful and Deceptive Use of the California Republican Party Trademarks, Insignia, and Name by Reform California Voter Guide and RepublicanVoterGuideCA.com

Dear Assemblymember DeMaio:

This letter constitutes a demand that you, your slate mailer organization Reform California Voter Guide (ID 1469001), and your website RepublicanVoterGuideCA.com immediately cease and desist from a coordinated, brazen, and unlawful campaign to deceive California voters into believing your privately controlled slate mailer is an official publication of the Republican Party. It is not. Your conduct constitutes a knowing and willful trademark infringement under federal and state law, a direct violation of California’s Truth in Endorsements Law, an unlawful solicitation of contributions in the name of a political party, a violation of the mandatory slate mailer disclosure statute, and an act of voter deception. The CRP demands that it stop immediately.

Make no mistake about the gravity of this matter. You are not an unsophisticated political novice. You are a sitting California State Assemblymember, the Chairman of Reform California, a former San Diego City Councilman, and a candidate the CRP itself has endorsed. You know full well that the CRP and its county central committees are the only bodies authorized under California law to issue official Republican Party endorsements, and you know exactly what you are doing when you brand a paid slate mailer with the words “OFFICIAL,” “Republican Central Committee Slate,” and the Republican Party’s elephant emblem. Your conduct is not a mistake. It is a calculated deception of California’s Republican voters, and it will not be tolerated.

I. The Unlawful Conduct

Reform California Voter Guide is a slate mailer organization for which you serve as Principal Officer and April Boling serves as Treasurer. Reform California Voter Guide has produced and distributed in connection with the June 2026 primary election a piece of campaign mail bearing, in large block lettering at the top of the mail piece, the words “REPUBLICAN

OFFICIAL ENDORSEMENT GUIDE,” directly alongside a prominent stylized red, white, and blue elephant emblem (the “Mailer”). The Mailer is signed “Carl DeMaio, Chairman of Reform California, CA State Representative, District 75,” and directs voters to RepublicanVoterGuideCA.com “for all official endorsements.”

The website RepublicanVoterGuideCA.com (the “Website”), which the Mailer directs voters to visit, compounds the deception. The Website’s navigation header reads “OFFICIAL Republican Voter Guide,” accompanied by the Republican Party elephant emblem. The hero banner reads “SAN DIEGO COUNTY REPUBLICAN VOTER GUIDE,” again accompanied by the elephant emblem. The page’s primary heading highlights “PRIORITY CANDIDATES.” The Website is technically configured so that, whenever a recipient receives a text message, email, or social media post containing the URL <https://republicanvoterguideca.com/>, the recipient's device automatically retrieves and displays a preview image (the “Share Image”) featuring the official Republican Party elephant emblem alongside the headline “Republican Voter Guide” and the legend “REPUBLICAN CENTRAL COMMITTEE SLATE.” This Share Image is distributed automatically and at scale through every text message, email, and social media share of the URL.

On or about Saturday, May 2, 2026, your operation amplified this deception through a mass SMS text message communication, signed “Carl DeMaio with RepublicanVoterGuideCA.com / Chairman, Reform California / CA State Representative,” apparently distributed to Republican voters in San Diego County. That text message expressly directs Republican voters to your Website as “the REAL San Diego County Voter Guide for Republicans,” and warns recipients to disregard other voter guides as “FAKE.”

Reform California Voter Guide is not a Republican Party committee. It is not chartered by, affiliated with, or authorized by the California Republican Party, the Republican Party of San Diego County, or any other official Republican Party body. It is a privately controlled slate mailer organization operating for your personal political benefit. The Mailer and the Website are not “official.” They are not the product of any “Republican Central Committee.” Every use of the word “OFFICIAL” in connection with the Republican Party in the Mailer, on the Website, and in your text messaging is a knowingly false statement designed to deceive Republican voters into believing they are receiving the imprimatur of the Republican Party when they are not.

Compounding your misconduct, the Mailer prominently endorses Kristie Bruce-Lane for California State Senate. The California Republican Party has not endorsed Kristie Bruce-Lane. Your representation that her name appears on the “OFFICIAL Republican Endorsement Guide” and on a “Republican Central Committee Slate” is, with respect to that candidate and others, demonstrably and verifiably false.

II. Willful Trademark Infringement Under Federal and State Law

The stylized red, white, and blue elephant emblem you have plastered across the Mailer, the Website, and your share images is the registered trademark of the Republican National Committee (U.S. Reg. No. 1,908,397, registered August 1, 1995, last renewed September 29,

2015), used by the California Republican Party under license. The California Republican Party itself owns a California-registered stylized California-elephant-and-map trademark, including the elephant emblem with three stars (Reg. No. 02047803), filed by the CRP with the California Secretary of State on June 9, 2025. All rights, title, and interest in these marks belong to their respective registrants. You have not sought, and you do not have, any license, consent, or authorization, express or implied, to use any of these marks.

Your unauthorized commercial and political use of these marks is a textbook violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), which prohibits any use of a trademark “likely to cause confusion, or to cause mistake, or to deceive” as to affiliation, connection, association, sponsorship, or approval. The likelihood of confusion here is not theoretical, it appears to be the express object of your campaign. The Mailer is literally captioned “OFFICIAL.” The Website is literally captioned “OFFICIAL Republican Voter Guide.” Your text messages literally identify the slate as “Republican.” Courts have recognized that political organizations may sue under the Lanham Act to protect their marks against precisely this kind of deceptive use. See, e.g., *United We Stand America, Inc. v. United We Stand, America New York, Inc.*, 128 F.3d 86 (2d Cir. 1997).

Your conduct also violates California Corporations Code §§ 21300 and 21301, which secure to the CRP the exclusive right to exploit the Republican Party name and insignia in California. Your conduct further potentially violates California’s Unfair Competition Law, Business and Professions Code §§ 17200 *et seq.*, because it is unlawful, unfair, and fraudulent business activity that deceives California consumers, in this case, California Republican voters.

Because your infringement is willful, deliberate, and undertaken with full knowledge of the CRP’s rights, the CRP is entitled to all available remedies, including injunctive relief, an accounting and disgorgement of all revenues received by Reform California Voter Guide attributable to the unlawful conduct, lost revenue, treble damages, statutory damages, punitive damages, and full recovery of the CRP’s attorneys’ fees and costs.

III. Violation of California’s Truth in Endorsements Law

The California Legislature enacted the Truth in Endorsements Law, Elections Code §§ 20000 *et seq.*, for precisely the situation you have engineered. The Legislature found that organizations using “as a part of their names the name of a political party qualified to participate in the direct primary election” have endorsed candidates and “publicized and promulgated the endorsements in a manner that has resulted in considerable public doubt and confusion as to whether the endorsements are those of a private group of citizens or of an official governing body of a political party.” Elec. Code § 20001(3). The Legislature declared, in language that reads as if drafted in response to your conduct, that “[t]he voting public is entitled to protection by law from deception in political campaigns in the same manner and for the same reasons that it is entitled to protection from deception by advertisers of commercial products.” Elec. Code § 20001(4).

Elections Code § 20007 expressly prohibits any candidate or any committee acting on a candidate’s behalf from representing “in connection with an election campaign, either orally or in campaign material, that the candidate has the support of a committee or organization that includes as part of its name the name or any variation upon the name of a qualified political party with which the candidate is not affiliated, together with the words ‘county committee,’ ‘central committee,’ ‘county,’ or any other term that might tend to mislead the voters into believing that the candidate has the support of that party’s county central committee or state central committee, when that is not the case.” (Emphasis added.)

Your Mailer, your Website, and your text message communications could not violate this statute more squarely if you had set out to draft an exemplar of prohibited conduct. The Website commands voters to “VOTE for This Republican Central Committee Slate.”



San Diego County Republican Voter Guide

VOTE for This Republican Central Committee Slate: What IS the Central Committee? Every County has a Republican Party Central Committee that acts as its ... [Read more](#)

Your Mailer is labeled “REPUBLICAN OFFICIAL ENDORSEMENT GUIDE.”



Finally, the share image displayed in every social media and text message preview appears to displays the words “REPUBLICAN CENTRAL COMMITTEE SLATE.”

Each of these representations is calculated to mislead Republican voters into believing the candidates pictured, including Kristie Bruce-Lane, have the support of the Republican Central

Committee, when that is not the case. The Legislature has expressly authorized any member of a state or county central committee to commence an action in superior court to enjoin this exact misrepresentation. Elec. Code § 20007.

IV. Unlawful Solicitation of Funds Under the Republican Party's Name

The Website prominently features a “CONTRIBUTE” button in its navigation header, placed directly next to the banner “OFFICIAL Republican Voter Guide.” This solicitation occurs in the context of repeated use of the Republican Party name, the official elephant emblem, and phrases such as “Republican Central Committee Slate” and “the REAL San Diego County Voter Guide for Republicans.”

This is a clear violation of California Elections Code § 20201, which makes it unlawful for any person or organization, in connection with the use of a qualified political party's name (or any representation that implies such use), to “directly or indirectly solicit funds for any purpose whatsoever upon the representation either express or implied that the funds are being solicited for the use of that political party” without first obtaining the written consent of the State Chairman, the Executive Committee of the State Central Committee, or the Executive Committee of the relevant county central committee. You have obtained no such consent. None will be forthcoming.

A violation of Section 20201 is a misdemeanor under Elections Code § 18360. The CRP reserves every right to pursue criminal referrals as well as civil remedies.

V. Demand

The CRP demands that you, Reform California Voter Guide, and every person or entity acting in concert with you, immediately and permanently:

1. Cease and desist from any further publication, distribution, transmission, posting, or display of the Mailer, the Website, the share image, and any related text message, email, social media post, or other communication that bears the Republican Party elephant emblem, the Republican Party name in a manner suggesting official party affiliation, the phrases “OFFICIAL Republican Voter Guide,” “REPUBLICAN OFFICIAL ENDORSEMENT GUIDE,” “Republican Central Committee Slate,” “OFFICIAL ENDORSEMENTS,” or any substantially similar formulation;
2. Take down RepublicanVoterGuideCA.com in its current form, remove all Republican Party emblems and “official” representations from the website, and disable the Open Graph and share image displaying the Republican elephant emblem and the “REPUBLICAN CENTRAL COMMITTEE SLATE” legend;
3. Cease and desist from soliciting contributions through any communication that uses the Republican Party name or insignia in a manner suggesting that funds are being solicited for the use of the Republican Party, in violation of Elections Code § 20201;

4. Immediately issue a corrective communication, by the same channels used to distribute the unlawful Mailer, Website, and text messages, retracting the false representation that the slate is “OFFICIAL” or endorsed by any Republican Central Committee, and clearly stating that Reform California Voter Guide is “NOT AN OFFICIAL POLITICAL PARTY ORGANIZATION,” as required by Government Code § 84305.5; and
5. Provide a full written accounting of every dollar in contributions received in response to the unlawful solicitations on RepublicanVoterGuideCA.com and the related text message campaign.

You must confirm in writing, no later than the close of business on Tuesday, May 19, 2026, that you and Reform California Voter Guide have complied with each of these demands. If you fail to do so, the CRP is prepared to seek every available remedy, including but not limited to: an action under the Lanham Act for injunctive relief, disgorgement of profits, treble damages, statutory damages, and attorneys’ fees; an action under Elections Code § 20007 to enjoin the misrepresentation that any candidate on your slate has the support of a Republican Central Committee; an action under Business and Professions Code §§ 17200 *et seq.* for restitution and injunctive relief; a complaint to the Fair Political Practices Commission for the violations of Government Code § 84305.5; and a complaint to the appropriate prosecuting authority for the misdemeanor violations of Elections Code §§ 18360 and 20201.

VI. Litigation Hold Notice

Litigation is likely to ensue concerning this matter. Under governing state and federal court rules, you, Reform California Voter Guide, April Boling as Treasurer, your counsel, and any agent, consultant, vendor, or contractor acting on your behalf are on formal notice to preserve and maintain all hard copies of documents as well as all email, text message, social media, and other electronically stored information pertaining to the Mailer, the Website, the share image, the May 2, 2026 SMS text message campaign, and any related communication. This includes, without limitation: all communications with the candidates listed on the Mailer (including Kristie Bruce-Lane and Rebecca Jones); all communications with the mail vendor, the SMS vendor, the Webflow content management system administrator, and any web developer or designer; all draft versions of the Mailer, the Website, and the share image; all contracts, invoices, and payment records; and all internal communications regarding the design, content, and distribution of these materials. Electronic information includes email, voicemail, word processing documents, spreadsheets, databases, calendars, networks, computer systems, servers, archives, backup systems, tapes, disks, drives, cartridges, other storage media, laptops, internet and Webflow records, web pages, personal computers, mobile devices, smartphones, and all cloud-based storage including Google Drive, Dropbox, iCloud, and any campaign data platform. Do not overlook portable hard drives, memory cards, thumb drives, and personal mobile devices. This list is not exhaustive; all documents and data relating in any way to the subject matter of this letter must be preserved. Your failure to comply with your statutory and common-law document preservation obligations may result in

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severe sanctions, including evidentiary sanctions, monetary sanctions, terminating sanctions, or other sanctions.

Direct all future communications concerning this matter to me at the address and telephone number above, or by email to atitus@bmhlaw.com.

You are cautioned to govern yourself accordingly.

Respectfully,

Ashlee N. Titus
General Counsel, California Republican Party

cc: Michael Columbo, Dhillon Law Group (mcolumbo@dhillonlaw.com)
April Boling, Treasurer, Reform California Voter Guide (april@aprilboling.com)