



September 21, 2023

Via EMAIL

Susan Muaddi Darraj
Director of Publishing
Palestine Writes Literature Festival
132 Pennsylvania Ave.
Yardley, PA 09067
susan@palestinewrites.org

Susan Abulhawa
Founder
Playgrounds for Palestine
PO Box 559
Yardley, PA 19067-8559
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Re: THIRD AND FINAL WARNING

Cease and Desist Unauthorized Use of Pennsylvania Council on the Arts Logo

Susan Muaddi Darraj and Susan Abulhawa:

This letter follows up on email communications between you and staff members of the Pennsylvania Council on the Arts (PCA) on September 20 and 21, 2023, regarding unauthorized and unlawful use of the PCA logo on a website for the Palestine Writes Literature Festival (<https://palestinewrites.org/>).

The PCA has repeatedly attempted to address this matter amicably and cooperatively, but the Palestine Writes Literature Festival organization has failed to take necessary action to resolve this matter. In fact, Palestine Writes abruptly reversed course and failed to follow through on its own offer to remove the logo entirely from the website. Instead, the sponsor web page was merely manipulated to list the PCA as a sponsor for "Palestine Writes Press," which the PCA expressly stated by email was not sufficient to resolve its concerns.

Therefore, this letter serves as a **third and final warning to cease and desist displaying the PCA logo anywhere on the Palestine Writes Literature Festival website.** You must immediately remove the PCA logo, and any other reference to PCA as a sponsor or supporter, from the Palestine Writes

Literature Festival website, including the festival “Sponsor” and “Supporter” page (<https://palestinewrites.org/supporters-2023/>), and any other areas of the website where they may appear. They must also be removed from all advertisements, promotions, and other communications or materials related to the festival going forward.

PCA is not a sponsor or supporter of the festival. As you are aware, PCA awarded limited grant funding to Playgrounds for Palestine. That grant award was limited to a literary anthology project and a series of workshops, seminars, readings, and other events to launch the anthology and provide publishing education to authors. While PCA understands that Palestine Writes is a parent initiative to Playgrounds for Palestine, PCA has provided no funding, or other sponsorship or support, to the parent initiative or to the festival.

PCA has also not otherwise authorized any use of its logo, or any other references to the PCA as a sponsor or supporter, related to the festival. Therefore, such logo use and references to the PCA create a misleading impression regarding the PCA’s role with that event. The changes to the sponsor web page do not remedy the misleading impression created by listing the PCA as a sponsor on the website of a festival that the PCA has no role in and no affiliation with, or the false attribution of the PCA’s funding to that event when the grant agreement is for a different project of Playgrounds for Palestine. Be advised that **engaging in business conduct that creates a likelihood of confusion or misunderstanding violates Pennsylvania consumer protection laws.**

Additionally, the PCA logo is a trademark constituting intellectual property of the Commonwealth of Pennsylvania (Commonwealth) and cannot be disseminated or distributed without the express written consent of the PCA. No permission or license to use the PCA logo has been granted to Palestine Writes, and the PCA has in fact repeatedly objected to that use. Be aware that **trademark infringement is a violation of state and federal law.**

To the extent you also represent Playgrounds for Palestine regarding its grant agreement with the PCA, and as the PCA previously notified you by email on September 20, 2023, any activities related to the festival are outside the scope of the approved Playgrounds for Palestine grant project. Additionally, the performance period for that grant expired on August 31, 2023, and the festival activities occurring September 22-24, 2023, would therefore not be eligible activities or costs chargeable to those grant funds.



You must provide to me **written confirmation by 9:00 a.m. on September 22, 2023**, that the PCA logo and all references to PCA as a sponsor or supporter have been removed **entirely** from the festival website and from all other communications and materials related to the festival going forward.

Failure to do so may result in immediate legal action by the PCA including but not limited to seeking a court order requiring removal of the logo, seeking compensation for the unlawful use of Commonwealth intellectual property, and referring this matter to the Pennsylvania Office of Attorney General.

Please provide a copy of this letter to your legal counsel and direct any further communications regarding this matter to my attention at ambsizemor@pa.gov.

A handwritten signature in blue ink that reads "Amber J. Sizemore".

Amber J. Sizemore
Counsel to Pennsylvania Council on the Arts

cc: Karl Blischke, Executive Director
Pennsylvania Council on the Arts