



Illinois Freedom of Information Act (FOIA) Request - 5 ILCS 140 / 1

Michael Ayele <waacl13@gmail.com>
To: agarcia@norridge80.net
Cc: "Michael Ayele (W)" <waacl13@gmail.com>

Fri, Nov 21, 2025 at 6:15 AM

W (AACL) Date.: November 21st 2025
Michael A. Ayele
P.O.Box 20438
Addis Ababa, Ethiopia
Email : waacl13@gmail.com ; waacl1313@gmail.com ; waacl42913@gmail.com

Freedom of Information Act (FOIA) Request

Hello,

This is Michael A. Ayele sending this message though I now go by W and I prefer to be referred to as such. I am writing this letter for the purpose of filing a FOIA request with Norridge School District 80. The basis for this records request is the biography generated by the Bing/MSN internet search engine (ISE) about Michael A. Ayele (a.k.a) W. ^[i]

I) Requested Records

What I am requesting for prompt disclosure are records in your possession detailing your discussions about [1] Michael A. Ayele (a.k.a) W as a Black Bachelor of Arts (B.A) Degree graduate of Westminster College (Fulton, Missouri) who (i) has never in the past contacted employees / legal representatives of Microsoft or the Bing/MSN search engine to solicit that they write and publish a "biography" of him; (ii) has on (or around) November 16th 2025 informed employees/legal representatives of Microsoft that the Bing/MSN internet search engine (ISE) (through the artificial intelligence powered Copilot) was generating a "biography" of him without his consent; (iii) has on (or around) November 16th 2025 informed employees/legal representatives of Microsoft that the Bing/MSN ISE (through the AI powered Copilot) was generating a "biography" of him without ever having asked for his input or authorization; (iv) has on (or around) November 16th 2025 informed employees/legal representatives of Microsoft that he objects to the Bing/MSN ISE associating his name with AI prompts (such as "michael ayele bio" and "michael ayele wiretap") because of their tendency to generate inappropriate and misleading AI content that exacerbate racism and discrimination on the internet; (v) has on (or around) November 16th 2025 informed employees/legal representatives of Microsoft that he objects to the use of his name, his image, his likeness or written content as a trigger reference point for AI hallucination; [2] the Bing/MSN ISE as an artificial-intelligence-powered platform owned and operated by Microsoft that (i) has infringed on Michael A. Ayele (a.k.a) W's right to publicity by generating an unsolicited and unauthorized "biography" of him through Copilot; (ii) has not contacted Michael A. Ayele (a.k.a) W at any time prior to November 16th 2025 to seek consent, verification or correction of the AI-generated "biography" and other content published in his regards; (iii) has associated Michael A. Ayele (a.k.a) W's name with AI prompts (such as "michael ayele bio" and "michael ayele wiretap") that he never authored, endorsed, or sought to have created; (iv) has allowed its Copilot AI system to generate content in ways that are factually incorrect, misleading, reductive and defamatory to the name, the image, the likeness and the published works of Michael A. Ayele (a.k.a) W; (v) has not escalated Michael A. Ayele (a.k.a) W's November 16th 2025 complaint to the internal divisions responsible for AI ethics, safety, and legal compliance — including the Office of Responsible AI (ORA), Copilot Control System, Microsoft Purview Compliance etc; [3] *Paolo Pavesich v. New England Life Insurance Company*; [4] *Haelan Laboratories, Inc. v Topps Chewing Gum, Inc*; [5] *Warren Spahn v. Julian Messner*; [6] *Vanna White v. Samsung Electronics America*; [7] the terms and conditions of the contractual agreements concluded between Norridge School District 80 and Microsoft Corporation for the use of their goods and services.

II) Request for a Fee Waiver and Expedited Processing

The facts presented in this request for a fee waiver and expedited processing will not bolster public confidence in the activities, the engagements and the priorities of Microsoft or the Bing/MSN search engine because they have [1] previously published a “*biography*” of Michael A. Ayele (a.k.a) W without his consent or authorization; [2] very inappropriately handled the concerns Michael A. Ayele (a.k.a) W shared with them on (or around) November 16th 2025 about the Bing/MSN search engine generating a “*biography*” of him without any form of outreach, consent or authorization; [3] failed to appropriately escalate his November 16th 2025 complaint to the internal divisions responsible for AI ethics, safety, and legal compliance — including Copilot Control System, Microsoft Purview Compliance, the Office of Responsible AI etc.

Historically, American jurisprudence has recognized that individuals possess legally protected rights in how others may use their name, their image, their likeness, and their identity. Indeed, the Georgia Supreme Court, the United States Court of Appeals for the Second Circuit, the New York Court of Appeals, and the United States Court of Appeals for the Ninth Circuit have collectively held (between 1905 and 1993) that [1] people have a fundamental right to exclude others from using their name, their image and their likeness for commercial purposes without consent (*Paolo Pavesich v. New England Life Insurance Company*); [2] the name, the image and the likeness of a person are property rights that cannot be exploited by others without permission (*Haelan Laboratories, Inc v. Topps Chewing Gum, Inc*); [3] it’s unlawful to use the name, the likeness and the identity of a person for trade or commercial purposes without obtaining consent (*Warren Spahn v. Julian Messner, Inc*); [4] a person’s right of publicity can be violated even without the direct use of a person’s name, image or voice (*Vanna White v. Samsung Electronics America, Inc*); [5] an individual’s right of publicity is violated when others appropriate the identity of the individual without consent (*Vanna White v. Samsung Electronics America, Inc*).

In the context of modern AI systems capable of producing “*biographical*” content, the principles set in the above-mentioned landmark cases are more relevant than ever before because AI hallucination is a well-documented phenomenon that routinely results in **false, misleading, racially biased, and stigmatizing characterizations** of people — thereby amplifying historical patterns of discrimination under the guise of algorithmic objectivity. In other words, when an AI system generates and publishes a biography about a living person without consent, input, notice, or accuracy safeguards, it is appropriating identity in violation of established law. Furthermore, that AI system which has generated and published the biography of a living person will very **likely have reproduced and exacerbated racist, sexist, and defamatory stereotypes at scale**.

The public has a compelling and legitimate interest in this information because:

- 1) The requested records will shed light on how Microsoft’s AI-powered search systems (such as Bing and Copilot) generate content about people by writing and publishing unauthorized “*biographies*” about them.
- 2) The requested records will shed light on how Microsoft’s AI-powered search systems (such as Bing and Copilot) generate content about people by writing and publishing unsolicited “*biographies*” about them.
- 3) The requested records will help the public to understand if government agencies were aware of Microsoft’s AI powered search systems ability to generate “*biographical*” content of people without obtaining the consent of the individual in question.
- 4) The requested records will help the public to understand if government agencies have previously discussed “*biographical*” content generated by Microsoft’s AI powered search engines without the personal authorization of the individual in question.
- 5) The requested records will help the public to understand if government agencies have previously discussed “*biographical*” content written and published by Microsoft’s AI that have contributed and participated to the defamation of people.

6) The requested records will help the public to understand if government agencies have previously discussed “*biographical*” content written and published by Microsoft’s AI powered search engines that have infringed on people’s right to publicity.

7) The requested records will help the public to understand if government agencies have previously discussed “*biographical*” content written and published by Microsoft’s AI that have exacerbated racism and discrimination on the internet.

For these reasons expedited processing is justified because:

- 1) Microsoft’s AI-powered search systems have in Calendar Year 2025 begun to generate content about people by publishing unauthorized “*biographies*” about them.
- 2) Microsoft’s AI powered search systems are generating “*biographical*” content of people without obtaining the consent of the individual in question.
- 3) Microsoft’s AI powered search systems are generating “*biographical*” content of people by infringing on individuals’ rights to publicity.
- 4) Microsoft’s AI powered search systems are generating “*biographical*” content of people by exacerbating racism and discrimination on the internet.

Under penalty of perjury, I hereby declare all the statements I have made to be true and accurate to the best of my knowledge.

Be well. Stay well. Take care. Keep yourselves at arms distance.

Michael A. Ayele (a.k.a) W
Anti-Racist Human Rights Activist
Audio-Visual Media Analyst
Anti-Propaganda Journalist

Work Cited

[i] November 16th 2025 Email Sent by Michael A. Ayele (a.k.a) W to Microsoft

Hello,

This is Michael A. Ayele sending this message though I now go by W and I prefer to be referred to as such. I am writing this letter to Microsoft because the Bing/MSN internet search engine (ISE) has generated a biography about me without my consent. Please see here.: <https://www.bing.com/search?q=michael+ayele+bio>

Unfortunately, I regret to inform you that the Bing/MSN search engine is tagging my name alongside prompts that have a tendency to hallucinate in a manner that further exacerbates racism and discrimination on the internet. I object to the Bing/MSN ISE generated biography about me because it was done without my consent and it contains content that is false and very reductive of me. I also object to the Bing/MSN search engine tagging my name alongside prompts that have a tendency to hallucinate in a manner that further exacerbates racism and discrimination on the internet.

Microsoft Response to Michael A. Ayele (a.k.a) W November 16th 2025 Email

Hi,

Quality and integrity of search results are important to Bing. So that we can complete our review of your request, please provide the specific term(s) or URLs you would like removed in an editable electronic format (e.g., Word or a .txt file). The URL(s) cannot be a www.bing.com URL because these pertain to search results and are not the original location.

If you have contacted the site owner and the content is no longer on the site, please use the Content Removal Tool to request a removal of outdated content in our web results: <https://www.bing.com/webmaster/help/bing-content-removal-tool-cb6c294d>

We will review and action your request as appropriate once we receive the requested information. If we do not hear back from you within 48 hours, this request will be closed and you will need to submit a new request.

Thank you,

Bing Team

November 16th 2025 Email Sent by Michael A. Ayele (a.k.a) W to Microsoft

This is Michael A. Ayele sending this message though I now go by W and I prefer to be referred to as such.

Via email, this morning, on November 16th 2025, I had contacted you to inform you that the Bing/MSN search engine through the Copilot artificial intelligence (AI) was generating content about me that hallucinated in a manner that exacerbated racism and discrimination on the internet.

Whenever AI hallucinates in a manner that exacerbates racism and discrimination on the internet, for me, this is very inappropriate.

If Microsoft as a company is not going to take responsibility for the AI hallucination generated through the Bing/MSN search engine, I will tell you straight up that you are being inappropriate and that you need to take care.

As previously mentioned, I would again like to reiterate that the Bing/MSN search engine has a generated a biography about me without my consent, and that biography is currently accessible through a Bing uniform resource locator (URL): <https://www.bing.com/search?q=michael+ayele+bio&FORM=RSMAG0> . The term that seems to have generated AI hallucination on the Bing/MSN search engine seem to be "*michael ayele bio*." So, the term "*michael ayele bio*" is definitely something that should be removed.

On a personal level, I was a little bit taken aback by the tone of your earlier message because it gave the impression that I had previously contacted employees / legal representatives of Microsoft or the Bing/MSN search engine to ask that a biography about me be published online. However, I have done no such thing. Indeed, I have never in the past contacted employees / legal representatives of Microsoft or the Bing/MSN search engine seeking that a biography be published about me online.

On my end, I would again like to stress that the so-called "*biography*" that was published about me on the Bing/MSN search engine was very much unsolicited and it was written without my consent. Furthermore,

the so-called "*biography*" that was published about me on the Bing/MSN search engine was very reductive of me and my published works. Additionally, I would like to again remind you that the Bing/MSN search engine has in the past generated AI content about me that is not only false, but also discriminatory and racist.

Unfortunately, I regret to inform you that the term "*michael ayele wiretap*" is also generating very inappropriate imagery on the Bing/MSN search engine by associating my previously published works on the biography of Jean Seberg (November 13th 1938 - August 30th 1979) to other individuals who have never written or published anything about the biography of Jean Seberg.

In response to your earlier email, please find attached to this email the list of URLs I would like to have removed from the Bing/MSN search engine.

Be well. Stay well. Take care. Keep yourselves at arms distance.

Michael A. Ayele (a.k.a) W
Anti-Racist Human Rights Activist
Audio-Visual Media Analyst
Anti-Propaganda Journalist



W (AACL) Nov 21st 2025 Records Request About Biography Generated by Microsoft AI.pdf
2020K