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VIA PRIORITY MAIL



***CEASE AND DESIST DEMAND
YOU ARE ADVISED TO CONSULT AN ATTORNEY***

Dear Ms. Gonzalez:

On behalf of our client, Boris Santos, we are sending you this **Cease and Desist Demand** in regard to certain false and defamatory statements made by you about our client online and elsewhere. **This letter is to demand that you cease from making any further statements about our client and refrain from contacting him.** Should you continue to pursue these activities in violation of this Cease and Desist Demand, we will not hesitate to take further legal action against you, including, but not limited to, filing a lawsuit and seeking a restraining order.

As you know, Mr. Santos is a highly accomplished and successful community leader who has garnered the respect of his colleagues and the local community through his expertise and hard work. Your actions have been willfully and deliberately orchestrated in a manner to cause harm to Mr. Santos's personal and professional life.

First, around October 2019, you made false allegations to Executive Committee members of the New Kings Democrats ("NKD"). Specifically, you falsely stated that Mr. Santos was guilty of sexual harassment. You further stated, without basis, that when Mr. Santos worked in the City Council, there had been two separate incidences of harassment involving alcohol and two different women in work-related events. We understand you repeated these unfounded and highly damaging accusations to two other political organizations.

In furtherance of your campaign against Mr. Santos, you also took direct action via your public blog post on Medium.com,¹ where you state:

A recent incident that didn't involve me directly, but instead involved someone who had been a friend for many years inspired me to put thought to paper and write this. A number of women came forward to report the behavior of this particular person, but did so anonymously because of fear of retaliation, and fear that nothing good would come from coming forward. With their consent I began talking to leaders in our organizing spaces to inform them of what I was told happened with this particular individual. The resulting months-long process left me with a bit of hope, with a lot of frustration, and a realization that most of us don't actually have any idea how we should realistically be approaching cases of sexual misconduct, especially when the person in question is someone you otherwise hold a level of respect towards.

Not only are the statements in this post completely fabricated, but you admit that you have no first-hand knowledge of any purported incidents. Your use of coded language to assert that "someone who had been a friend for many years" engaged in "sexual misconduct" does not shield you from potential liability for defamation. While you do not mention Mr. Santos's name directly, your history of repeating this false charge against him, coupled with your targeted post directed at members of the local political community, indicates to readers that your reference is to him alone. Moreover, the fact that they were posted publicly on your Medium account demonstrates your calculated intent to cause as much harm as possible to his reputation.

Mr. Santos has a right to remain free from your harassment and defamation and we are prepared to take legal action to protect that right. Recourse for such behavior may entail a lawsuit for harassment, defamation per se, tortious interference with contractual relations, and intentional infliction of emotional distress. The remedies for such conduct will include money damages to compensate Mr. Santos for any harm that you have caused. **Should we be forced to file a lawsuit against you, we will seek the maximum amount of damages permitted by law.**

Unless we receive written acceptance of your commitment to perform your obligations within seven days (*i.e.*, **by the close of business Monday February 22, 2021**), Mr. Santos may be forced to pursue legal action to vindicate his rights, including, but not limited to, filing an action for harassment and related causes of action.

Please note that a copy of this letter and a record of its delivery will be stored. Please also note that this letter may be presented in a court of law. This letter is sent without prejudice to our client's rights and claims, all of which are expressly reserved. If you have questions about any of the foregoing, you or your lawyer may contact me directly.

¹ <https://medium.com/@thesqueekywheel/why-are-we-so-bad-at-addressing-sexual-misconduct-fec3da70fd53>

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Very truly yours,

A handwritten signature in blue ink, appearing to read "David D. Lin", with a long horizontal flourish extending to the right.

David D. Lin