



DEMAND LETTER OF CEASE AND DESIST
ALL DEAFAMATION, SLANDER AND LIBEL OF CHARACTER AND REPUTATION

Tuesday, February 8, 2022

Re: DEFAMATION

Will Maddox
Managing Editor, D CEO Healthcare Editor , D CEO
will.maddox@dmagazine.com

Mr. Maddox:

Dr. Peter McCullough is a world-renowned doctor and scientist in the scientific community and beyond who has spent his life building a positive reputation. Nevertheless, we have been informed that you have been maliciously spreading inaccurate and unfounded information that is damaging to his personal and professional character and reputation. Even more egregious, you are doing so at a time when the world is profoundly suffering at the hands of misinformation, yet significantly benefitting from the information Dr. McCullough is providing regarding the COVID-19 vaccines.

You are hereby notified to cease and desist any and all further unlawful defamation, slander and/or libel with regard to your actions and/or statements relating to the incident which occurred on January 25, 2022 on the D-Magazine: Dallas Doc to Joe Rogan: Physicians and World Leaders Have 'Mass Formation Psychosis' , in which the following defamation occurred.

The defamatory statements include, but are not limited to, the following: "Another of McCullough's talking points, which he also detailed before the Texas Senate, is that healthy people under 50 do not need to get the vaccine. The issue has been fact-checked and discredited by numerous authorities and plenty of empirical evidence, but interestingly enough, Rogan hosted a guest earlier this month who spoke to the risks of the vaccine compared to the virus in young people....McCullough goes on to doubt the efficacy of the vaccines, saying that those who have already had COVID should not get vaccinated and that there have been very few people who get it twice. The omicron surge has proved that to be wrong again. In Dallas, 95 percent of the deaths at Parkland Hospital have been unvaccinated individuals."

In accordance with law, it is illegal to provide a false statement, whether written or oral, of an individual's character and/or reputation, which:

1. Consists of any false statement intended to cause harm or damage another's character and/or reputation;
2. Is communicated to another either in writing or verbally; and
3. The offending party is aware or should have been aware that such statement was false.

Your citing anonymous and unreferenced “fact-checkers” is defamatory. Because there are no randomized trials demonstrating efficacy of the current vaccines for the Omicron variant and that the CDC (CDC Dec 10, 2021) indicates the majority of those with Omicron are fully vaccinated, the statement about Parkland admissions is more likely a reflection of a lack of early effective treatment and not a statement concerning Omicron. Thus as a layperson and not a medical professional, you have defamed Dr. McCullough. More correctly, Dr. McCullough is an internist, cardiologist, epidemiologist managing the cardiovascular complications of both the viral infection and the injuries developing after the COVID-19 vaccine in Dallas TX, USA. Since the outset of the pandemic, Dr. McCullough has been a leader in the medical response to the COVID-19 disaster and has published “Pathophysiological Basis and Rationale for Early Outpatient Treatment of SARS-CoV-2 (COVID-19) Infection” the first synthesis of sequenced multidrug treatment of ambulatory patients infected with SARS-CoV-2 in the American Journal of Medicine and subsequently updated in Reviews in Cardiovascular Medicine. He has 54 peer-reviewed publications on the infection and has commented extensively on the medical response to the COVID-19 crisis in The Hill, America Out Loud, and on FOX NEWS Channel. On November 19, 2020, Dr. McCullough testified in the US Senate Committee on Homeland Security and Governmental Affairs and throughout 2021 in the Texas Senate Committee on Health and Human Services, Colorado General Assembly, New Hampshire Senate, and South Carolina Senate concerning many aspects of the pandemic response. On January 24, 2022, Dr. McCullough co-moderated and testified in the US Senate Panel “COVID-19: A Second Opinion” chaired by Senator Ron Johnson. Dr. McCullough has two years of dedicated academic and clinical efforts in combating the SARS-CoV-2 virus and in doing so, has reviewed thousands of reports, participated in scientific congresses, group discussions, press releases, and has been considered among the world's experts on COVID-19.

As a journalist you could have and should have availed yourself of this/these fact(s) before making said false statements. Instead, you demonstrated reckless disregard for the truth. You made said defamatory statements in writing. Further, as a journalist you knew or should have known that your statement would be harmful to Dr. McCullough’s character and/or reputation. Accordingly, you bear the requisite intent for liability to Dr. McCullough for defamation by slander and/or libel. Additionally, we hereby contend that in accordance with slander and libel laws in this country, your defamatory remarks caused injury to Dr. McCullough’s reputation furthering your liability to him.

Therefore, you are hereby requested to immediately cease and desist the illegal defamation, slander and/or libel you have and are engaging in regarding Dr. McCullough [and within 10 business days, return the signed written assurance below affirming that you will refrain from any further acts of said defamation, slander and/or libel with regard to Dr. McCullough’s character and/or reputation].



Failure to comply with this cease-and-desist request, and/or return the signed assurance within the stipulated time, will leave us no other alternative but to pursue all available legal remedies, including but not limited to, filing a motion for injunctive relief, monetary damages, filing fees, court costs and/or attorney fees.

Sincerely,
Parisa Fishback, Esq.
President/General Counsel
The Unity Project

ASSURANCE TO CEASE AND DESIST FURTHER ACTS OF DEFAMATION, SLANDER AND/OR LIBEL

In accordance with the above request and stipulation, I, Will Maddox, do hereby agree to immediately cease and desist the defamation of Dr. Peter McCullough's character and/or reputation. In turn, Dr. Peter McCullough will release me from all acts of defamation, slander and/or libel relating to these incidents.

However, should I act or behave in such manner that would result in a breach of this agreement, Dr. Peter McCullough shall be entitled to filing fees, court costs and attorney fees in any action which may be filed in an effort to enforce this agreement, in addition to any injunctive relief and/or monetary damages that Dr. Peter McCullough may have been entitled to have this assurance never been signed.

WILL MADDUX

Date Signed: _____