

February 20, 2023

John Duran  
[givemeliberty369@gmail.com](mailto:givemeliberty369@gmail.com)

**Re: Notice to Cease and Desist Defamatory Conduct**

Mr. Duran:

Please be advised that my office serves as General Counsel for the Cesar Chavez Foundation ("CCF"). As such, please direct any subsequent communication regarding this matter exclusively to my attention.

My office has been made aware of your series of unsolicited communications to CCF staff wherein you threaten to publish unwarranted and defamatory attacks against Cesar Chavez and CCF. Per your communications to CCF staff, we understand that you may be involved in a legal matter against Paul R. Chavez and the Paul R. Chavez Investment Group ("PCIG"). CCF staff has repeatedly informed you that neither Paul R. Chavez nor PCIG are in any way affiliated with the work and services being provided by CCF. Therefore, any attempt to connect and/or impute the actions taken by Paul R. Chavez and PCIG to CCF would be willfully false and misleading.

CCF is a 501(c) (3) tax-exempt charitable organization that works to safeguard the legacy of the late Cesar E. Chavez and carry on his life's work through a number of community-based service programs. CCF has been providing low-income residents with social services for over 57 years. During this time, CCF has established a well-founded reputation amongst its business partners and the communities it serves. Your threats of unwarranted actions and baseless accusations can potentially damage CCF's reputation and adversely affect our operations.

Despite several clear statements from CCF staff notifying you that neither CCF nor Cesar Chavez are associated with Paul R. Chavez or PCIG, you have made several threats to publish articles wherein you incorrectly associate CCF and Cesar Chavez with Paul R. Chavez and/or PCIG. Examples of these threats include:

- "The legacy of Cesar Chavez is at stake."
- "I would like to share with you my intentions that will have a devastating impact on the Foundation and the UFW."

If you choose to proceed with your threats to publish a statement wherein you falsely associate Paul R. Chavez and PCIG with CCF and/or Cesar Chavez, this statement would undoubtedly be considered *defamation per se* in that it depicts CCF as potentially engaging in unlawful activity. Additionally, it has come to our attention that you are actively encouraging or soliciting the publication of the aforementioned defamatory statements. Pursuant to the *Fair Housing Council of San Fernando Valley v. Roomates.com LLC* decision, you will likely have serious financial exposure to CCF for any subsequent publication of your threatened defamatory statements.



Again, your attempts to spread libelous and defamatory material about CCF and Cesar Chavez may result in irreparable injury to CCF's reputation and business. Thus, we hereby demand that you immediately cease and desist from publishing defamatory statements about CCF, including, but not limited to, falsely associating CCF and Cesar Chavez with Paul R. Chavez and PCIG. This demand shall also apply to any third-parties that you have been in contact about publishing said defamatory material.

Please note that CCF does not attempt to restrict legitimate free speech and it believes that the internet is an important medium for the dissemination of accurate and truthful information and for fair comment on issues of interest. Your activities, however, unlawfully encroach upon CCF's rights.

By means of this letter, you are on notice that should you refuse to comply with our demands by February 21, 2023, we will have no choice but to explore all legal causes of action against you, including the filing of a lawsuit. In the event of a lawsuit, we will also pursue both damages and attorneys' fees and costs incurred by CCF as a result of your actions.

This is a very serious matter that requires your immediate attention. This letter is our attempt to resolve this matter amicably. Please be aware that this letter is copyrighted by my office, and you are not authorized to republish this in any manner. Use of this letter in a posting or article, in full or in part, will subject you to further causes of action.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul S. Park', written over the word 'Sincerely'.

Paul S. Park, Esq.  
General Counsel