

**Will Manuel**  
Partner  
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601.592.9915 direct



October 9, 2023

Elliot Husbands  
CAMPAIGN MANAGER AT TATE REEVES FOR GOVERNOR  
Post Office Box 24355  
Jackson, MS 39225  
Email: [ehusbands@gop.com](mailto:ehusbands@gop.com)  
[elliotthusbands1@gmail.com](mailto:elliotthusbands1@gmail.com)

Re: Cease and Desist

Mr. Husbands:

On behalf of Silicon Ranch Corporation (“Silicon Ranch”), I write to demand that you immediately cease and desist airing and publishing the defamatory ad entitled “Signature” available at: [https://youtu.be/H7AN-jtC63U?si=68Y9rGOsRnnP9\\_VU](https://youtu.be/H7AN-jtC63U?si=68Y9rGOsRnnP9_VU) (the “Advertisement”). If the Campaign is represented by counsel, please promptly forward this letter to counsel.

The Advertisement, paid for by the Tate Reeves for Governor Campaign, is demonstrably false in numerous respects and has been made with ordinary negligence towards private citizens and actual malice within the meaning of *New York Times v. Sullivan*, 376 U.S. 254 (1964). With this notice, you should now immediately cease publishing the Advertisement in television broadcasts on local television stations, where you have aired it or caused it to be aired. Likewise, this demand extends to publication of the Advertisement on all internet platforms, including websites and social media.

The Advertisement contains audio falsely accusing employees of Silicon Ranch of “breaking the law” by making past political contributions in their personal capacity to the political campaign of Public Service Commissioner Brandon Presley. Moreover, in separate frames, the Advertisement contains text falsely stating “Illegal Contributions” made in reference to the same contributions. Prominently displayed in the background of this false statement are two pictures of the Chairman of the Board of Silicon Ranch, accompanied by his name and the names of other Silicon Ranch employees, strongly implying that either the Board Chairman or Silicon Ranch acted illegally.

Neither the Advertisement nor the source materials cited therein demonstrate a basis for the statement that Silicon Ranch or any of its employees made any illegal or improper contributions. First, and perhaps foremost, Silicon Ranch has made no corporate contributions to Commissioner Presley or any other candidate or campaign committee. Any implication that Silicon Ranch has done so is patently false. The past contributions made by Silicon Ranch employees were made in each employee’s personal, and not official, capacity. Silicon Ranch employs nearly 300 people in more than 15 states across the United States, and each person is entitled to his or her political preference. Its employees have the right, but no obligation, to

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participate in the political process by making personal contributions from personal funds, subject to applicable legal limits, to any candidate of their choosing.

The Advertisement implies that contributions made by employees of Silicon Ranch were illegal because Mississippi law forbids a member of the Public Service Commission from accepting a political contribution from a company he or she regulates. In a frame, the Advertisement shows a picture of this supposed law. The actual law, however, rebuts any implication of wrongdoing by Silicon Ranch or its employees. Mississippi Code § 77-1-11 states that “it shall be unlawful for a public service commissioner... to knowingly accept any... political campaign contribution... from any person interested as owner, agent or representative... of any . . . electric utility company, or any other public utility that shall come under the jurisdiction or supervision of the Public Service Commission.” MS. Code § 77-1-11 (emphasis added). Silicon Ranch is not a public utility under Mississippi law. The Commission itself has declared this fact numerous times. *See Final Order of Public Service Commission, In Re: Joint Petition of Mississippi Power Company and SR Meridian III, LLC*, August 17, 2017. Since Silicon Ranch is neither a public utility nor an electric utility company, a subset of public utilities, the limitations in Mississippi Code § 77-1-11 are completely inapplicable. Therefore, any statement or implication that Silicon Ranch or its employees have violated the law by contributing to Commissioner Presley is wholly untrue and defamatory.

In consideration of the foregoing, should you fail to immediately cease broadcasting, publishing, and promoting the subject of the Advertisement, Silicon Ranch will pursue all available legal remedies to cease the publication of this defamatory advertisement, including seeking injunctive relief and damages for the continued improper publishing and broadcasting of the Advertisement

Thank you for your immediate attention to this matter.

Sincerely,



J. William Manuel