

November 12, 2016

CONSTANCE  
MCLENNAN

By Certified Mail

Aaron F. Park  
401 Bremerton Ct.  
Roseville, CA 95661

**Re: Notice to Cease and Desist Defamation**

Dear Mr. Park:

You are hereby directed to cease and desist all defamation of my name.

If you are represented by counsel, please direct this letter to your attorney for review and consideration.

It has come to my attention that you have made defamatory and false statements about me in written form. You willfully made such statements to injure my personal character and reputation. Under California law, it is unlawful to engage in defamation of another's character and reputation.

The defamatory statements in your November 9, 2016, RightOnDaily internet blog post titled "The Biggest Win on Election Night in Placer County – Joe Patterson, the Biggest Loser, Peter Hill" include:

- Accusing me of "Cyber-Stalking Joe" [Patterson]—a criminal offense. California Penal Code 646.9 PC defines stalking as making "a credible threat" against someone and "placing that individual in reasonable fear for his/her safety or the safety of his/her family." Posting factual information about a political candidate's occupation or activities on public websites does not constitute "cyberstalking."
- Characterizing me as a "mentally unstable"; and
- Falsely speculating that someone solicited or paid me "in the same manner as...Hillary Clinton was proven to be paying the violent protesters at Trump events."

The above statements, which you actively and maliciously published on the internet (on your blog and on Facebook) are utterly false and without merit, and they are defamation per se. Accordingly, I hereby demand that you:

1. remove your defamatory statements from the blog post referencing me; and
2. issue a public apology or retraction within twenty-one (21) days.

3908  
BAL TIC CIRCLE  
ROCKLIN  
CALIFORNIA  
95677

TELEPHONE  
916-624-1957

connie.mclennan@  
gmail.com

Please be further advised that your refusal to remove your defamatory statements will be additional evidence of malice and will be construed accordingly unless you take steps to rectify the situation as outlined above.

To the extent that demand for a retraction is required prior to the initiation of legal action under California Civil Code § 48a2, this correspondence constitutes a demand for such a retraction. By statute, you have three weeks from the date of this demand to publish such a retraction in said RightOnDaily online publication in as conspicuous a manner as were the libelous statements.

In sum, I am seriously and in good faith contemplating litigation over this matter. I will allow you seven (7) days from the date of this communication to remove the defamatory statements, or legal action will be imminent. This letter puts you on notice that should you refuse to comply with my demands within the time limits specified, the legal relief sought may include monetary damages, injunctive relief, and an order that you pay court costs and attorney's fees for your defamation.

Please be aware that this letter is copyrighted by me and that you are not authorized to publish it in any manner. Use of this letter by posting it, in full or in part, will subject you to further causes of action.

I recommend that you consult with an attorney regarding this matter. If you or your attorney have any questions, please contact me directly.

Sincerely,

A handwritten signature in cursive script that reads "Constance McLennan". The signature is written in black ink and has a long, sweeping underline that extends to the right.

Constance McLennan

cc: Anwyl, Scoffield & Stepp

3908 BALTIC CIRCLE  
ROCKLIN, CA 95677

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401 Bremerton Ct.  
Roseville, CA 95661

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