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October 27, 2020

VIA E-MAIL

Aaron F. Park  
[RightOnDaily.com](http://RightOnDaily.com)  
E-Mail: [aaron@rightondaily.com](mailto:aaron@rightondaily.com)

Re: Cease and Desist

Dear Mr. Park:

I represent the family of Willow Taylor Yang, who is a minor. Your website is presently displaying a photograph of Ms. Yang, as well as a recording of a private conversation between Ms. Yang and another party. As both the picture and the recording are being displayed in violation of state and federal law, this page must immediately be taken down.

As to the photograph, please be advised that Ms. Yang owns the copyright in both the photograph displayed as well as the text. You do not have her permission to display these works, and by doing so you are in violation of the United States Copyright Act. See 17 U.S.C. § 101 *et. seq.* As such, your continued display of these works without Ms. Yang's consent may be the subject of an action for copyright infringement under section 501 of the United State Copyright Act. In order to avoid such as action, you must immediately cease and desist from using or displaying the infringing work.

As to the recording, please take notice that California follows the "two party consent" law. This means that both parties must be made aware that a conversation is being recorded and both parties must give their consent to any recording. As is made obvious from the recording itself, Ms. Yang was never made aware that her conversation was being recorded, nor did she consent to such a recording. Therefore, the recording was made in violation of California law. See Cal. Penal Code § 632. By allowing the recording to be heard by others without Ms. Yang's permission, you are in direct violation of California law. See Cal. Penal Code § 637. In addition to criminal penalties, you may be held liable for civil damages as well. See Cal. Penal Code § 637.2.

Finally, your display of these items, including personal details of Ms. Yang's life violates her right to privacy protected under the California Constitution. Again, Ms. Yang did not and does not consent to such use. The fact that Ms. Yang is a minor only contributes to your potential liability.

For these reasons my client does hereby demand that you cease and desist from any further display of these items and that you take down the page featuring Ms. Yang and the illegal recording within 48 hours of the receipt of this letter.

Aaron F. Park  
RightOnDaily.com  
October 27, 2020  
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We trust no further action on this matter will be required.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Andrew W. Stroud", with a long horizontal flourish extending to the right.

Andrew W. Stroud

AWS:msf