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September 5, 2017

Mockingbird Publishing Co.

Mr. Bello II

Columbus, OH 43211

via CMRRR No. 7016 2710 0000 9323 9190
and First Class U.S. Mail

NOTICE OF INTENT TO FILE LAWSUIT

Dear Mr. Bello:

This firm represents the Dallas/Ft. Worth and Houston chapters of The Proud Boys and this correspondence constitutes notice of their intent to file a lawsuit against you for the false and defamatory article authored by you and published by Mockingbird Publishing Co. a/k/a The Mockingbird titled "Neo-Nazi Group Targets Residents in South Campus Area". My firm will also be associating with lawyers from Ohio to obtain damages on behalf of Ohio chapters of The Proud Boys that were libeled by your article. Specifically, your article contains the following false and defamatory statements:

- (1) The article falsely states that The Proud Boys are a "Neo-Nazi Group";
- (2) The article falsely states that members of the Houston chapter were flashing "white power" or "nazi" hand signs (the article contains a photograph of members of the Houston chapter carrying guns, but not flashing any hand signs reasonably associated with "white power" or national socialism);
- (3) The article falsely states that the Ohio Proud Boys placed hand-drawn swastikas into mailboxes and mail slots in an attempt at unlawful intimidation;
- (4) The article falsely states that the Ohio Proud Boys were in Houston, when in fact, the only chapters providing hurricane relief in Houston were from the Houston, Dallas/Ft. Worth, San Antonio, Austin, and Miami chapters;
- (5) The article falsely states that the fraternity members who undertook an anti-looting patrol were performing "ethnic cleansing"; and

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- (6) The article falsely states that The Proud Boys are roaming the nation trying to shoot people.

While I would normally permit a publication such as yours the opportunity to make a correction and issue a retraction, it's clear from the context of the article and your willful disregard for the facts that making such a demand will be fruitless. Accordingly, demand is for you and Mockingbird Publishing Co. to immediately and permanently remove the offending article. Second, demand is made for you and Mockingbird Publishing Co. to **cease and desist** all future false and defamatory articles concerning any chapter of The Proud Boys. Finally, demand is also made to payment in the amount of \$10,000.00 in damages to "The Proud Boys" as full and final settlement of the damages to the reputations of those depicted by your article to the organization as a whole and its individual members. Please direct your payment to this office.

You must either comply with all of the demands contained herein within fourteen (14) days of your receipt of this letter, or in the alternative, provide my office with a reasonably time frame by which you will comply. Should you fail to do so, I have been authorized to initiate a lawsuit against you.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jason L. Van Dyke", is written over a large, circular scribble.

Jason L. Van Dyke
Attorney & Counselor at Law