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* ALSO ADMITTED IN THE DISTRICT OF COLUMBIA
** ALSO ADMITTED IN LOUISIANA

March 3, 2011

VIA CERTIFIED U.S. MAIL

Mr. Aaron F. Park
401 Bremerton Court
Roseville, California 95661
Article No.: 7010 1060 0002 0254 2488

Mr. George Park, Jr.
5783 River Run Circle
Roseville, California 95675
Article No.: 7010 1060 0002 0254 2495

Re: Cease and Desist Demand Regarding Karen England

Gentlemen:

This firm represents Karen England and the Capitol Resource Institute ("CRI"), a non-profit public benefit corporation. We write concerning certain weblog entries authored by you, which are posted and maintained on your website Right On Daily (www.rightondaily.com). These weblog entries are false and defamatory and have damaged our clients. We write you to demand that these entries be immediately removed from your website and retractions be published as to each of them.

Since September of 2010, you have posted, and continue to make available on-line on your website, numerous writings that falsely question the moral integrity and the mental health of Ms. England. You also falsely impugn the charitable purposes of CRI and assert wholly fabricated and false allegations of apparently criminal misconduct against CRI. The false and defamatory statements have damaged, and continue to damage, our clients. For example, in obvious reference to our clients, you have done the following:

- You have falsely stated that Ms. England may be mentally ill. In your January 25, 2011, post, you state that "any candidate needs to evaluate the mental health of an endorser," further contending that "...Karen [England] needs therapy." This statement is false. Ms. England is not mentally ill.
- You note, in your October 1, 2010, post that former California State Senator Tim Leslie endorsed Ms. England "[u]ntil I called him to explain [Ms. England's] mental illnesses." You claim that Senator Leslie responded: "I'll never do that again." This statement is similarly false for the reason previously stated.

Aaron Park and George Park, Jr.

Re: Cease and desist demand regarding Karen England

March 3, 2011

Page 2 of 3

- You falsely state, in an October 11, 2010, post that Ms. England used the 2010 California Lieutenant Governor's election as a "gag... fundraiser for the financially failing CRI." This is simply not true. Ms. England's recent candidacy was undertaken in her capacity as a private citizen and had nothing whatsoever to do with CRI. Moreover, CRI is not in financial distress. Both of these statement have damaged, and continue to damage, CRI.
- You falsely have accused Ms. England and CRI of criminal conduct. In an October 11, 2010, post, you claim that tax-exempt funds donated to CRI by political candidates are used to pay for non-exempt activities undertaken by Ms. England. If such a statement were true (which it most certainly is not), it would constitute a crime under both state and federal law. This self-styled "Grand Lie" is defamatory per se and has, nonetheless, damaged, and continues to damage, Ms. England and CRI.
- You similarly have stated in postings made on September 29, 2010, October 7, 2010, October 11, 2010, and November 12, 2010, that CRI is a "formerly legit organization," and that the non-profit organization "routinely hauls in cash from candidates for office" in exchange for campaign support. This statement is likewise a false accusation of criminal misconduct on the part of Ms. England and CRI, which is defamatory per se.
- In January 23, 2011, and February 12, 2011, postings, you falsely accused Ms. England of lying about the fact that she was interviewed by the Federal Bureau of Investigation regarding certain matters in recent months, insinuating that Ms. England is unbalanced as demonstrated by her claim to have been interviewed by the FBI. It is our understanding that Ms. England was indeed contacted by special agents of the Sacramento Field Office of the Federal Bureau of Investigation. Your statements are false and defamatory. Ms. England has been damaged and continues to be damaged by their ongoing publication on your website.
- You have falsely suggested during meetings of the Placer County Republican Central Committee and in email correspondence with Congressman Tom McClintock's staff that Ms. England filed a complaint with the Placer County District Attorney's office. This statement is false. Ms. England did not file any complaint or report with the Placer County District Attorney's office.

Libel, a form of defamation under California Civil Code section 45, "is a false and unprivileged publication by writing which exposes any person to hatred, contempt, ridicule or obloquy, or which causes [that person] to be shunned or avoided, or has a tendency to injure [that person] in [that person's] occupation." Furthermore, if it is established that the writings violate California Civil Code section 45a, "a libel which is defamatory of the plaintiff without the necessity of explanatory matter, such as an inducement, innuendo, or other extrinsic fact, is said

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Aaron Park and George Park, Jr.

Re: Cease and desist demand regarding Karen England

March 3, 2011

Page 3 of 3

to be libel on its face.” This means that the injured party need not prove or allege that she has suffered special damages as a result of the libelous statements.

It appears that your website is devoted to California Republican politics involving Placer, El Dorado and Sacramento counties. While you are certainly free to comment on political candidates, elections, and conservative values, your false personal attacks, in regard to our clients, cross the line from legitimate political commentary to malicious defamation and libel per se. Further, it is apparent from the sum and substance of your postings that you harbor an intense personal dislike of our clients that rises to the level of malice, as the postings are clearly intended and calculated to expose Ms. England and CRI to “hatred, contempt, ridicule or obloquy.” Indeed, it is readily apparent from reading your most venomous personal attacks that you clearly intend to damage Ms. England’s reputation and harm CRI. The numerous false accusations of criminal misconduct are unmistakably intended to destroy Ms. England’s credibility as an advocate and to undermine CRI’s ability to operate and to raise funds in support of its important work.

Accordingly, our clients demand that you immediately take the following action and confirm to us in writing within five (5) business days that such action has been taken:

- All false and defamatory material, including, specifically, the material referenced above, shall be removed from your website.
- You will remove any other references to Ms. England or CRI on your weblog or archive of your weblog that is publicly accessible on the internet.

If you do not respond to this letter and confirm in writing that such steps have been undertaken, our clients will initiate appropriate proceedings in order to vindicate their legal rights and be compensated for the damage that has been done to them.

We await your response.

Sincerely,

SWEENEY & GREENE, LLP



James F. Sweeney

JFS:jmc:jmm