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GABRIELA NEUFELD, Legal Assistant

April 4, 2018

VIA ELECTRONIC MAIL ONLY

Daniel Wallace
News Editor, The Channels Newspaper
channels@sbcc.edu

Re: Dr. Michael Shermer
Demand to Cease and Desist

Dear Mr. Wallace:

We sent you previously a demand to cease and desist regarding our client, Dr. Michael Shermer, via e-mail with a response deadline of April 2, 2018.

That date has come and gone, we have not heard from you, and the March 19, 2018 article that appeared in The Channels defaming our client remains available to the public on The Channels website, thereby continuing to perpetuate falsehoods that potentially harm his reputation and livelihood (<https://www.thechannels.org/news/2018/03/19/michael-shermer-to-speak-despite-harassment-allegations>), most notably (but not limited to) the falsehood included in the article quoting Dr. Raeanne Napoleon that “[a]lthough the police did not bring formal charges against him, there have been many witnesses that have publicly corroborated the stories of the victims.” (emphasis added).

Anyone reading this statement would, understandably, be led to believe that a police report and investigation had been conducted regarding the “accusations” against Dr. Shermer, but the police, for whatever reason, “did not bring formal charges”. This is an untrue and malicious statement: to Dr. Shermer’s knowledge, the police were never contacted about these spurious allegations (or for any other reason about him) and thus no report could ever have been filed against him. Repeating this falsehood in The Channels is defamatory and not protected speech under the First Amendment.

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The demands outlined in our March 23 correspondence to you stand, including the immediate removal of the libelous article from your website. In light of the fact that our correspondence was sent shortly before SBCC's spring break, we will wait an additional few business days, until April 12, 2018 at 5:00 p.m. to receive your response.

Nothing in this letter constitutes a waiver of any of Dr. Shermer's rights in law or in equity, all of which are expressly reserved.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Tim L. Neufeld", with a stylized flourish at the end.

Timothy L. Neufeld

TLN:JML
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