



October 15, 2019

Mr. Leon Benham, Executive Director  
Citizens for Coastal Conservancy  
923 Seacoast Drive  
Imperial Beach, CA 91932

Re: Cease and Desist Misrepresentation of the Surfrider Foundation

Dear Mr. Benham,

On behalf of Surfrider Foundation ("Surfrider"), I am writing this letter to request that you immediately **CEASE and DESIST** from spreading false information about the Surfrider Foundation and distributing libelous pamphlets and Letters to the Editor. Specifically, Surfrider Foundation has been engaged for years to clean up the coastal waters in the border region through our Clean Border Water Now campaign and advocate for a DECREASE in contaminated water off the coast, counter to your allegations stating we are "planning a 400% increase in Mexican sewage dumped off Imperial Beach." Your statements are extreme and outrageous, confusing to the public, and thus rising to the level of a tortious act. It is our position that you are knowingly spreading these falsehoods to cause irreparable harm to the Surfrider Foundation.


It has been brought to our attention that you have distributed factually incorrect pamphlets that contain numerous misleading and libelous statements as well as submitted Letters to the Editor. These misstatements of facts are libelous and are a tortious economic interference to the Surfrider Foundation as you are damaging our reputation as an environmental organization. Your statements are damaging the reputation of the organization and potentially impacting our ability to fulfill our mission. Your actions are illegal and could result in fines levied against you for loss of business reputation.

It is imperative that you immediately cease and desist from your continued libelous and tortious statements. Failure to do so will result in immediate legal action against you.

We wish to receive your assurances that you will stop spreading falsehoods related to Surfrider Foundation's Clean Border Water Now campaign by October 21, 2019. If you fail to respond to this letter or comply by that date, we reserve the right,

without further notice to you, to pursue all available legal and equitable remedies. In addition, if it is brought to our attention that you are continuing your belligerent and tortious activities we will pursue legal action.

Sincerely,



Michelle Kremer, Esq.

Chief Operating Officer

Cc: Chad Nelsen, CEO, Surfrider Foundation

Mitchell McKay, CEO, Citizens for Coastal Conservancy

Valerie Acevez, Secretary, Citizens for Coastal Conservancy

Dane Crosby, CFO, Citizens for Coastal Conservancy