

GreenspoonMarder

From the desk of:
Deborah Baker-Egozi, Esq.
Brickell World Plaza, Suite 3600
600 Brickell Avenue
Miami, Florida 33131
Phone: 305.789.2770
Fax: 305.537.3900
Direct Phone: 305.789.2709
Direct Fax: 305.537.3909
Email: deborah.baker@gmlaw.com

September 19, 2017

Via Certified U.S. Mail, RRR and E-mail

Mr. Kevin Vericker
7250 Hispanola Avenue
North Bay Village, FL 33141

kvericker@gmail.com

Re: Cease and Desist/Take-Down Demand

Dear Mr. Vericker:

This office represents Connie Leon-Kreps (“Ms. Leon-Kreps”) in connection with the defamatory publications you have made about her on social media, verbally and otherwise. You have intentionally and with actual malice made false and defamatory statements about Ms. Leon-Kreps. These statements include knowingly false publications, which allege: (i) that there is a criminal investigation against Ms. Leon-Kreps; (ii) that Ms. Leon-Kreps is under criminal investigation for sending extortion letters to a fellow North Bay Village commissioner; and (iii) that the FBI is investigating Ms. Leon-Kreps.

All of these statements are false and were made by you with actual malice. As such, they are actionable. This letter shall serve as notice that you shall take down all of your false and defamatory statements about Ms. Leon-Kreps by the close of business on Friday, September 22, 2017. You shall similarly cease and desist all of your defamatory conduct towards my client. Should you fail to do so, my client will avail herself of all remedies available to her under the law, including but not limited to a lawsuit in a court of competent jurisdiction for defamation. If she is required to file suit, she will seek an award of punitive damages and will pursue prevailing party attorneys’ fees pursuant to Florida Statute.

GOVERN YOURSELF ACCORDINGLY.

Very truly yours,

GREENSPOON MARDER, P.A.



Deborah Baker-Egozi, Esq.
For the Firm

cc: Ms. Connie Leon-Kreps

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