

# ERICKSON | SEDERSTROM

ATTORNEYS AT LAW

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February 22, 2022

Mr. Brian Williard  
3801 Rokeby Road  
Roca, NE 68430

Re: **Cease and Desist Demand**  
Our File No.: 22232.064206

Dear Mr. Williard:

We represent the United Way of Lincoln & Lancaster County (hereinafter "United Way"), and have been requested to correspond with you concerning your on-going public campaign against the United Way, including your continuing utterance of false and defamatory statements about United Way and its executive leadership, including, but not limited to, Meagan Liesveld, its Executive Director.

Most recently, we have been provided with a video and audiotape of your appearance at the Lincoln City Council Meeting on Monday, February 7, 2022, which evidence we have added to our continuing collection of your public statements about United Way.

Please be advised that it is the position of the United Way that, when you have brought issues to it, Ms. Liesveld and others have listened and given careful consideration to each and every one of your concerns. Please also be advised that the United Way has numerous processes in place in which it regularly engages to ensure that donor dollars provided to a program or agency are spent appropriately. This includes regular monitoring and receipt of an audit from each program and agency funded through the allocation process.

Please treat this correspondence as the formal demand of United Way that you immediately cease and desist from making any further false and defamatory statements about the United Way, Ms. Liesveld, or any other executive or representative of the United Way. We will continue to monitor your conduct, and all public statements which in any way reflect upon the United Way. In the event that you continue to make public statements about the United Way, or any specific representative of the United Way which are false and defamatory, we will have no

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other alternative than to institute any and all appropriate courses and causes of action to protect the interests of United Way and its leadership.

Finally, please be advised that it is the position of the United Way and this law firm, pursuant to Neb. Rev. Stat. § 25-840.01(2), that your publication of false statements about United Way, Ms. Liesveld and other representatives are “prompted by actual malice.”

GOVERN YOURSELF ACCORDINGLY.

Sincerely,

ERICKSON | SEDERSTROM, P.C.

Handwritten signature of Mark M. Schorr in blue ink, with the initials 'CSB' written at the end.

Mark M. Schorr

MMS:csb

C: Ms. Meagan Liesveld, Executive Director (*via E-Mail*)  
Mr. Brian Chaffin, Board Chair (*via E-Mail*)