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Attorney at Law



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SENT VIA CERTIFIED MAIL & EMAIL: [swagners@yahoo.com](mailto:swagners@yahoo.com)

Sean Wagmeister  
30 Stagecoach Road  
Bell Canyon, CA 91307

**RE: Cease and Desist – Defamatory Statements and False Accusations – Yoav Shalev**

Dear Mr. Wagmeister,

This law office represents Yoav Shalev. I am writing to formally demand that you immediately **cease and desist** from making and disseminating **false, defamatory, and misleading statements** about **Yoav Shalev** in your recent video titled “*Sean Wagners Ep7*”, which was distributed to the Bell Canyon community.

In the aforementioned video, you falsely claimed that Yoav was **illegally lobbying on behalf of a 501(c)(3) organization**, specifically the Bell Canyon Volunteer Wildland Fire Department, by “putting up signs” and “not following rules.” You further alleged that Yoav **refused to show insurance policies** for the organization. These statements are patently false and misleading:

1. **Yoav Shalev is not a director** or officer of the Bell Canyon Volunteer Wildland Fire Department, nor does he have any fiduciary responsibility to disclose organizational documents, including insurance policies, to private individuals or the homeowner's association.
2. **Yoav Shalev has never engaged in illegal lobbying.** As you are well aware, the IRS's lobbying restrictions for 501(c)(3) organizations pertain to **public elections**, not internal community HOA recall elections. Your own presentation slide acknowledged this distinction, yet you deliberately disregarded it in your verbal narrative.
3. Contrary to your claim, a **full copy of the insurance policy was provided to FOX 11 News** and shown during a public town hall meeting. It is both misleading and irresponsible for you to imply that such information was withheld.

Your statements, made in a public forum and disseminated to a wide audience, are not only **factually incorrect** but **defamatory**, as they harm my personal and professional reputation. Furthermore, they are presented in a manner that suggests **willful disregard for the truth**.

Accordingly, I demand that you:

1. **Immediately cease and desist** from making or publishing any further false or defamatory statements about Yoav Shalev;
2. **Retract** the false claims made in your “Ep7” video regarding illegal lobbying and insurance refusal;
3. **Issue a written correction and public apology** via email to the Bell Canyon community acknowledging the errors in your statements and clarifying that your claims were unfounded and incorrect.

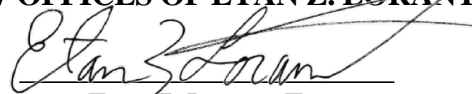
If you fail to take the corrective actions outlined above within **five (5) business days** from the date of this letter, we will explore all available legal remedies, including but not limited to filing a claim for **defamation, false light, and intentional infliction of reputational harm**.

This letter is not a complete statement of rights and remedies, and nothing herein should be construed as a waiver of any legal or equitable rights Yoav Shalev may have in this matter.

Very Truly Yours,

**LAW OFFICES OF ETAN Z. LORANT**

By:

  
Etan Z. Lorant, Esq.

EZL/nfs