

# RHODES LEGAL GROUP PLLC

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July 10, 2017

Clarence Moriwaki  
155 Madison Avenue North  
Bainbridge Island, WA 98110

Re: Request for Correction of Defamatory Publications

Dear Mr. Moriwaki,

On behalf of our client, Richard Lee Ryneerson III, this notification serves as a request that you correct two defamatory statements immediately. Both statements are detailed below along with the requested corrections to be made.

1. On or about 10 March 2017 you posted publicly on your assigned Facebook page that “I am being... physically stalked by Rick Ryneerson, a.k.a Richard Lee” and “He has also physically stalked my home.”
  - a. The defamatory meaning of the statement is Mr. Ryneerson placed himself physically outside your residence for the purpose of stalking you, in violation of the law.
  - b. These statements are false. They are based on a post made by Mr. Ryneerson on a third party’s assigned Facebook page (Ms. Bonnie McBryan) that was shared with you. The post by Mr. Ryneerson was clearly an analogy as it stated “in Clarence’s analogy” and was relayed to you by Ms. McBryan as “metaphorical[.]” You were aware the post referred to an analogy, and that Mr. Ryneerson did not physically stalk you or your home for several reasons. First, prior to the “analogy” post on Ms. McBryan’s Facebook page, you had provided your party analogy to Mr. Ryneerson in a private message, and he responded to your analogy that, “...if we were at an event with a variety of our neighbors, you would try to put your hand over my mouth because you don’t want me to question your viewpoints or to bring up facts that you find uncomfortable.”

Second, for you to have believed that Mr. Ryneerson's statement referred to physical events, you would have had to believe that you had actually hosted a physical party that Mr. Ryneerson attended and you had actually placed your hand over his mouth and actually threw him out of your actual party. Obviously, this did not occur. Third, you would have had to consider a person on a public sidewalk talking to the public to be physical stalking, which it is not. Finally, the post plainly used the term "analogy" in its text, and Ms. McBryan described the post as "metaphorical[]" when she relayed it to you.

- c. You also listed a police report, stating that it contained details and examples to back up your claim but those details show the only evidence was the "analogy" post on Facebook. The police determined the physical stalking claim was baseless. Your claim that Mr. Ryneerson "physically stalked" you and your home was knowingly false and defamatory.
  - d. It is requested that you edit your public statement above to correct your false statement, and also prominently post a new public Facebook post on your assigned Facebook page describing your false statements and correcting them so that the same public audience that saw the defamatory statements is likely to see the correction.
2. On February 27, 2017 you posted on the public Facebook group, "Bainbridge Island Inclusion Squad" that Mr. Ryneerson was stalking you and listed in your allegation that "[Mr. Ryneerson was] reportedly physically stalking my home..."
    - a. This statement is false and defamatory for the reasons described above in 1(a)-(b). No one reported that Mr. Ryneerson had physically stalked your home. Ms. McBryan in fact confirmed to you that Mr. Ryneerson was speaking metaphorically.
    - b. It is requested that you edit your public statement above to correct your false statement, and also prominently post a new public Facebook post in that group describing your false statement and correcting it so that the same public audience that saw the defamatory statements is likely to see the correction.
3. Your defamatory statements have injured the reputation of Mr. Ryneerson among the neighbors he lives with on Bainbridge Island and have generated fear of him as a result of your false statements. Your timely and prominent correction of these defamatory statements is requested.
  4. Please contact us with any questions or concerns.

Respectfully,

Alexander Savojni  
Attorney for Richard Rynearson