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July 10, 2015

Tiffany Anderson 2 N. Avena Ave. Lodi, CA 95240

Dear Ms. Anderson:

As you know, I am the general counsel for the San Joaquin County Mosquito and Vector Control District. Over the last several years, you have undertaken a consistent course of communication designed to harass and embarrass the District and Eddie Lucchesi, its manager. Your conduct has included internet postings and e-mails addressed to Mr. Lucchesi and mailed to a number of other individuals. Your communications have annoyed and harassed Mr. Lucchesi and most recently caused him alarm and concern. As requested previously, I ask that you cease direct communication with Mr. Lucchesi

All future communications should be sent to the attorney handling a matter involving you. Sara Skolnik of Stockwell Harris is handling your worker's compensation claim and should receive all correspondence regarding that forum. I should receive all correspondence regarding the 132 A claim. Michael Christian of Jackson Lewis represents the District regarding civil or non-workers' compensation employment claims. Any other communications involving the District or District business can be addressed to me as the District's general counsel. In short, there is no basis for you to contact Eddie Lucchesi directly regarding any of your claims.

In any correspondence regarding Mr. Lucchesi, the District will not tolerate any language that is defamatory or threatening. By way of example, I direct your attention to the July 3, 2015 email addressed to Mr. Lucchesi. In that email you list a number of actions alleged to have been taken by Mr. Lucchesi, all baseless, but which you described as "evil" and for which you suggest that he should "repent." You then state "I pray that your sons do not pay for the sins of their father." That statement constitutes an unacceptable veiled threat to Mr. Lucchesi and his family. Let me be clear; should there be any further implication of a threat to Mr. Lucchesi, his family or any member of the District staff, that correspondence will be sent to the Lodi Police Department and a restraining order will be sought against you.

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You are entitled to your own opinions regarding the District and your term of employment there. You are not entitled to make defamatory and/or threatening statements regarding Mr. Lucchesi. In your July 3, 2015 email you suggested that Mr. Lucchesi was a liar and that he was "donating to John's bogus retirement slush fund" which would constitute a crime. Both of those statement fit the common law definition of libel being a written statement which is untrue and which will do harm to Mr. Lucchesi's reputation. Additionally, those allegations were hurtful to Mr. Lucchesi personally and to his family.

Neither the District nor Mr. Lucchesi personally will tolerate any further written harassment or defamation by you. You are free to pursue any legal rights you may have against the District, but if you act in a manner which constitutes harassment or defamation the District will defend its employees and pursue all available legal avenues to do so.

CHRISTOPHER K. ELEY Attorney at Law

CKE/kl Cc: Client