

October 18, 2018

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VIA EMAIL AND MAIL

James B. Renacci
150 Smokerise Drive
Wadsworth, OH 44281-8701

Re: Cease and Desist

Dear Mr. Renacci:

I write as counsel to Senator Sherrod Brown. On Wednesday, October 17, 2018, The Cincinnati Enquirer published an article which makes clear that you made false and libelous statements to their editorial board regarding Senator Brown. I demand that you and your campaign immediately cease and desist from making any similar statements in any form.

While noting that you did not provide “any proof or specifics,” the Enquirer article states that you claim that “multiple women” have contacted you and alleged that Senator Brown assaulted them. This claim is false and libelous: it accuses Senator Brown of actions that he has never taken, during the time-period you identified or otherwise, and worse, it does so without any actual substantiation. You have not been able to provide “any proof or specifics” because, indeed, no such proof or specifics exist. At the very least, you were acting with reckless disregard to the truth, as you must have been aware that the statements you were making had no basis in fact. *See Jackson v. Columbus*, 117 Ohio St. 3d 328, 331, (2008).

You bear the ultimate responsibility for the libelous and defamatory claims that you and your campaign are making. You and your campaign are now unquestionably on notice that these claims are factually false. If you continue to publish these falsehoods, you are now acting with knowledge that the statements you are making are false. *See Jacobs v. Frank*, 60 Ohio St. 3d 111, 116, 573 N.E.2d 609, 614 (1991).

Please contact me at (202) 654-6200 by the close of business today to confirm that you have received this letter and will comply with the demand that you and your campaign will immediately cease and desist from making any similar statements in any form. If you do not, I will be advising my client regarding further legal action against you and your campaign.

Jim Renacci
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Very truly yours,



Marc Erik Elias
Counsel to Senator Sherrod Brown