

KOCH & SCOW^{LLC}
ATTORNEYS AT LAW

Daniel H. Stewart
(702) 318-5043 (Direct Dial)

dstewart@kochscow.com

11500 S. Eastern Ave., Suite 210
Henderson, NV 89052

(702) 318-5040 Tel
(702) 318-5039 Fax
www.kochscow.com

March 22, 2013

VIA HAND DELIVERY

Councilman Steve Ross
The Committee to Re-elect Steve Ross
8500 Willow Cabin St.
Las Vegas, Nevada 89131

**Re: Cease and desist making knowingly false statements
about Suzette LaGrange**

Councilman Ross:

Suzette LaGrange has retained this firm to defend against knowingly false statements that your campaign has made in recent mail pieces. Attached to this letter are the mailers in question.

In those mail pieces, you have claimed all of the following knowingly false statements:

1. "As a leader of a lobbying group, Suzette LaGrange supported a plan to hammer drivers on US-95 with fees."
2. Suzette LaGrange was "Toll Road Lobbyist."
3. "SUZETTE LAGRANGE'S PLAN to charge drivers a fee to travel on US-95..."
4. "SUZETTE LAGRANGE LED A LOBBYING GROUP THAT WOULD MAKE YOU PAY MORE JUST FOR DRIVING."
5. "LAGRANGE TOLL."

6. Suzette LaGrange was “the leader of a toll road plan.”

In support of these statements, you cite the following: 1. NAIOP Southern Nevada Chapter, “NAIOP Government Affairs News,” 4/17/09; 2. Las Vegas Sun, 4/12/09; 3 www.suzettelagrance.com/about.

None of these sources support your statements in any way. In fact, the sources actually prove the falsity of your claims and, that you were aware that the statements were false when you made them. NAIOP’s Government Affairs committee did support a toll road plan in 2009, as indicated by your sources; however, as is explicitly evident by the link you cite, Suzette LaGrange did not become a member of or co-chair that committee until 2011. See www.suzettelagrance.com/about.

Suzette LaGrange never participated in or led any effort to support the 2009 toll road plan, and you know that. Your own sources make that perfectly clear. Assuming you read what you cited before making your claims, you knew what you were saying was false at the time you said it. Therefore, your statements not only clear the high bar for libel and defamation of a public figure, they also put you outside the protections of NRS 41.650.

Please consider this letter to be a formal demand that you cease and desist from making any of these or similar statements again in any format, including, but not limited to mail, print, internet, oral communications, or any advertisement of any kind. If you fail to comply with these demands, my client will have no choice but to pursue any available course of action allowed by law.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel H. Stewart", with a long horizontal flourish extending to the right.

Daniel H. Stewart, Esq.

Encl.

Cc: Client