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Equestrian Media Group
8 The Green, Ste 5046
Dover, DE 19901

Re: Reporting on Geneva Boston by Justin Alderman, Stephen Floyd, and NW Horse Report Staff

Greetings,

Our firm has been retained to represent Geneva Boston in civil litigation.

Your Media Publication Affiliate, Northwest Horse Report has published false and defamatory statements without undertaking due professional diligence to verify their accuracy or provide the minimum necessary factual context..

On September 5, 2023, your affiliate published a story entitled "Oregon horse trainer in leaked viral video arrested on felony aggravated animal abuse"

This article contained numerous false and misleading statements, as well as sensationalizing and mis-characterizing a video of an interaction with a horse, with the result that it has destroyed Geneva Boston's reputation in the community and her career while badly injuring her mental health.

The story was erroneous in the following respects:

The story relied on unnamed jail officials for details of the investigation. The recommended charge and the appearance date on the police citation is not a charging instrument. Ms. Boston was briefly held on suspicion of a charge due to public outcry over a horse training video, but Ms. Boston was never charged with a crime or scheduled for any public hearings. The Horse in the video was being subject to specialized training techniques as it had severe behavioral issues

that had proven difficult to remedy. It suffered no permanent injuries as a result of the techniques being used. The article stated that Geneva Boston Repeatedly Jerked the lead line attached to an iron halter. The halter was aluminum and Boston was not "jerking" on the lead.

The article claimed Ms. Boston was being held without bail prior to a September 6 court appearance, and again quoted an unnamed jail staff member to state she was scheduled for arraignment the following month, the fact is that the case was never charged and there were never any court appearances scheduled for Ms. Boston at the time of writing. A simple call to the county court or the DA office could have provided the accurate information. There is no reason to rely on an anonymous jail deputy for information about scheduled appearances in a criminal case.

The article further reported, again inaccurately, that Boston was arrested at her Aumsville barn. This was false. She was contacted by MCSO detectives, cooperated fully, and turned herself in at the police station.

In fact Ms. Boston was promptly released and the case was not charged by the District Attorney because no crime took place. Ms. Boston was undertaking legitimate horse training work on behalf of a client and did not have any intention of harming, abusing or neglecting any animals. There was never any proof that any animal was actually injured in the video.

On September 8, in an article entitled "Horse auction concealed ownership by 'kill buyer' - also allegedly tied to woman charged in viral horse abuse video, further falsehoods were repeated. Ms. Boston was never charged with any crime in connection with the incident. A cursory glance at ORS 167.322, which is quoted verbatim by the earlier article outlines the required state of mind for the felony charge, stating that "Maliciously" means intentionally acting with a depravity of mind and reckless and wanton disregard of life and "Torture" means an action taken for the primary purpose of inflicting pain.

Any District Attorney or any rational observer would agree that forceful training a horse, even if utilizing techniques that other professionals or enthusiasts would criticize, does not come close to the criminal state of mind described by the statute. If the intention of the horse trainer is to properly train the horse then they aren't undertaking the action for the primary purpose of inflicting pain nor acting with depravity of mind. Therefore when the article incorrectly reports Geneva Boston as being "charged" with this offense when she was actually not charged it is attempting to assert that probable cause existed for this offense in the court of public opinion. In fact, none did.

The September 8 article goes on to make numerous false and unfounded statements exaggerating Boston's involvement with PNW horse sales and an individual named Donald Nowlin. Geneva Boston only rode one horse at auction on behalf of another seller. She was never employed by PNW horse sales and she never sold any horses through the auction. She was not "heavily involved" with the company or responsible for any of its practices. This claim was repeated in a September 12 article titled "Horse sale company removes past auction history from online site after allegations of deceiving buyers" and again in a September 15 article titled "Horse auction

announces closure amid scrutiny and discovery of auctioneer's past arrests for horse theft." This article concluded with a disclaimer asserting that "Equestrian Media Group's reporters are part of the Society of Professional Journalists and adhere to SPJ Ethics Standards."

However in an October 3 article, "DA declines horse abuse case due to uncooperative witness" the newspaper claims that the DA declined the case due to an uncooperative witness with no source cited for the information, merely "alleging" this to be the case. This is extremely likely to be false. If the DA did not file charges, it was because they felt there was not probable cause or sufficient evidence to support the charge. Many criminal cases have "uncooperative witnesses." Said witnesses can easily be compelled to testify and their statements when put in context of a criminal investigation by the detectives used to convict a defendant. The primary reason this case was not charged as animal abuse was because there was no evidence the Horse in question was injured by the Ms. Boston.

Ms. Boston demands that all articles containing factually erroneous references to her court appearances, her "charges," her "abuse" of a horse, and her "heavy involvement" are removed immediately and a retraction is published by Northwest horse report. If you do not comply within 14 days of receiving this letter, Geneva Boston will be forced to exercise all legal options available to her, including pursuing actions for defamation of character, libel, slander, harassment, and negligent infliction of emotional distress.

Sincerely,

LAFKY & LAFKY

/s/ Erin C. Mee

Erin C. Mee

cc: client