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Our File #: DE-NX8-KQD

January 4, 2024

Erin C. Mee
Lafky & Lafky
429 Court St. NE
Salem, OR 97301

RE: Equestrian Media Group

Ms. Mee:

I write in response to your letter to Equestrian Media Group ("EMG") dated November 7, 2023. EMG denies all accusations that any publication referenced in your letter was false and/or defamatory.

To clarify a few points:

1. ***"The story relied on unnamed jail officials for details of the investigation."***

EMG's reporting did not rely on jail officials. As reported in EMG's story, it contacted the Marion County Sheriff's Office jail to confirm information provided on the jail's online booking roster, not the aspects of the investigation. The jail official was listed as unnamed because they did not identify themselves. Ms. Boston was not just briefly held/detained, she was arrested and records confirm this. EMG also indicated that jail booking information indicated "no bail," which it has documented carefully. EMG clearly outlined the fact that Ms. Boston was released and not held on bail, which was exactly what happened and the information it learned from jail officials.

2. ***"Ms. Boston was never charged with a crime or scheduled for any public hearings"***

Ms. Boston was indeed scheduled for a court hearing on or about October 4th—information that was repeatedly confirmed with multiple court officials. Court hearings are public by their nature, and it need not be publicly advertised to be "public." The night of her arrest, jail officials also confirmed the October 4th hearing date scheduled for Ms. Boston, which would have been provided to Ms. Boston during her release. Additionally, Ms. Boston was certainly arrested on charges of animal abuse.

3. ***"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 'jerked' on the lead."***

Ms. Boston is seen clearly jerking the lead line on the video, and using such a description is more than reflective. As far as iron halters, EMG spoke to numerous experts who showed examples of this, but iron or aluminum appears to be irrelevant. EMG can include Ms. Boston's claim that the halter was aluminum and not iron in future reporting.

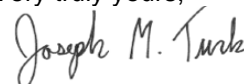
4. ***"The September 8th article goes on to make numerous false and unfounded statements exaggerating Boston's involvement with PNW horse sales and an individual named Donald Nowlin. Geneva Boston only rode one horse at auction on behalf of another seller. She was never employed by PNW Horse sales and she never sold any horses through the auction."***

EMG has been able to document and interview numerous individuals who have provided details as to the nature and changes in the relationship between Ms. Boston and Mr. Nowlin over several years. Mr. Nowlin also publicly admitted the horse depicted in the video belonged to him, confirming that Ms. Boston had an ongoing relationship with Mr. Nowlin.

Simply put, there is no legal basis for any of your claims due to the truth of the statements in EMG's publications and various press protections under the 1st Amendment of the U.S. Constitution. There are no legal grounds for your claims, and any lawsuit for defamation, harassment, and/or negligent infliction of emotional distress will be quickly disposed. EMG reserves all rights to seek attorneys' fees from Geneva Boston in the event of meritless litigation.

Should you have any questions regarding the content of this letter, you may respond to our offices in writing to the address above. Please include the intake number DE-NX8-KQD on any correspondence. Should you wish to speak with me, please call (302) 861-0478. You will need to provide the intake number when you call so that the matter may be properly routed to me.

Very truly yours,



Joseph M. Turk
For the Firm

JT/tt

Cc: Equestrian Media Group LLC