

# The Center For Consumer Freedom<sup>®</sup>

December 13, 2011

## BY EMAIL

Karol Minor  
Humane Society of Berks County  
1801 N. 11th Street  
Reading, PA 19604  
kminor@berkshumane.org

## RE: Notice of False Statements

Dear Mr. Minor:

It has come to my attention that on or about December 1, 2011 you made or disseminated false and libelous statements regarding the Center for Consumer Freedom (CCF).

Specifically, on your blog<sup>1</sup>, you wrote:

*The freedom they [CCF] seek, on behalf of companies which profit from the torment of animals, the cancer of smokers, the deaths of loved ones, and the serfdom of low wage workers, is to be free of any voice which speaks against the actions of mega-corporations or impacts their profit margin.*

CCF is an independent 501(c)(3) organization that in no way operates “on behalf of” such companies, nor does CCF seek to get rid of the free speech of those who disagree with us. CCF in fact encourages robust and open debate on a variety of issues and simply offers its own point of view.

You also wrote:

*All of us have different views of how the world should work and they [CCF] have every right to advocate for toxic levels of lead in food or for the marketing of tobacco to children.*

Your implication that CCF advocates for “marketing of tobacco to children” or “toxic levels of lead in food” is wholly unsupported and defamatory. CCF engages in no such activity whatsoever. CCF’s work regarding smoking (from over a decade ago) was limited to smoking sections in restaurants. And CCF in fact brought to light earlier this year the excessive levels of lead found in some reusable bags.

---

<sup>1</sup> <http://berkshumane.info/blog/?p=596>

Please be advised that the statements referenced above are all false statements of fact that injure the reputation of the Center for Consumer Freedom.

By this letter I demand that you cease and desist making or disseminating these false statements and promptly retract and remove them from your website. The retraction must be prominently displayed, and remained posted for the same period of time that the defamatory statements were posted. Failure to remove these statements notwithstanding your knowledge of their falsity constitutes actual malice.

While you enjoy First Amendment rights to speak freely about issues of public concern, you are not entitled to cross the line and make patently false representations that defame individuals or companies and cause injury to their businesses and reputations.

Please contact me to advise when you will be complying with these demands. The Center for Consumer Freedom reserves its rights to pursue this matter in a court of law.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Berman". The signature is fluid and cursive, with the first name "Rick" and last name "Berman" clearly distinguishable.

Rick Berman, Esq.  
Executive Director

[Berman@ConsumerFreedom.com](mailto:Berman@ConsumerFreedom.com)