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February 14, 2018

**VIA EMAIL &
REGULAR MAIL**

David Lohman, City Attorney
City of Ashland
20 E. Main Street
Ashland, OR 97520
david.lohman@ashland.or.us

Re: Christine Dodson

Dear Dave:

With grave concern, I write again to demand that the City immediately and permanently *cease and desist* making any more defamatory statements about Ms. Dodson. As you know, on September 29, 2017, I wrote to you about your own defamatory statements concerning Ms. Dodson. For your reference, I enclose a copy of that letter. Yet, despite that admonition, the City has again published false and misleading statements about her that disparage her professional abilities. As you know, these statements appear in Commissioners Landt's and Gardiner's official Statements of Justification. As you also know, they each signed those statements certifying "that the information in the statements of justification is true." Notably, any false information on the Statement subjects both Commissioners Landt and Gardiner to felony prosecution, potential imprisonment and/or a substantial fine. Under those serious circumstances, I can only reasonably conclude that you vetted, wrote and/or approved their recent spate of defamatory comments. If I am mistaken, please immediately so advise in writing.

As a related aside, your and the Commissioners' mean-spirited and relentless effort to injure Ms. Dodson is appalling, particularly given her remarkable and tireless effort to help Ashland's senior citizens during her tenure as the Senior Center Manager. The wide-spread support for the recall effort, and for Ms. Dodson generally, speaks volumes to her performance and value, which is likely why you and the Commissioners feel so compelled to spread lies about her.

Turning to Commissioner Michael Gardiner's Statement, he falsely wrote that: "Our ex-senior program manager authored her own misfortune by failing to accept the accountability and responsibilities that belong to that management position." Obviously, Commissioner Gardiner has falsely implied that Ms. Dodson not only had performance issues but that her alleged performance issues were sufficiently egregious to justify her termination. There is no truth in

that statement – and the City knows, or should know, it. In fact, Ms. Dodson consistently performed her job duties with great responsibility and accountability to her constituents. Given the glaring falsity of those statements, and the serious harm they have done and continue to do to Ms. Dodson's professional reputation, we demand their immediate removal from Commissioner Gardiner's Statement, the City's written assurance that it will not be re-published in any form and the issuance of a letter of correction.

As to Commissioner Rick Landt's Statement, he falsely wrote:

Senior Center unauthorized decisions and irregularities included:

- Providing non-professional financial & estate planning advice
- Counting staff time serving other non-profits as paid time worked
- Allowing volunteers without background checks to have access to seniors
- Lacking necessary record keeping

All of those statements are either totally false or gross misrepresentations of the truth that are specifically designed to discredit and hurt Ms. Dodson's professional reputation. Accordingly, we similarly demand that those statements be immediately removed from Commissioner Landt's Statement and the City's written assurance that they will not be re-published in any form, along with the issuance of a letter of correction. Alternatively, please immediately provide a detailed written description of the basis for each of those defamatory statements, along with any written documentation to support them.

Please know that your immediate attention to these matters is of the utmost importance. Ms. Dodson is suffering serious emotional distress as a result of the City's intentional effort to hurt her. Lastly, please consider this letter as Ms. Dodson's notice of her additional tort claims against the City of Ashland.

Very truly yours,



Christopher Lundberg

CGL:lsf
Enclosure
Cc: Client





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September 29, 2017

**VIA EMAIL &
REGULAR MAIL**

David Lohman, City Attorney
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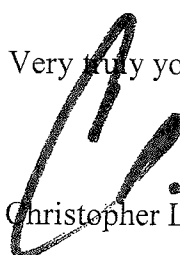
Re: Christine Dodson

Dear Dave:

It has come to my attention that you recently described Ms. Dodson in a defamatory fashion – namely, as a “trouble maker” and “a rabble rouser,” and falsely claimed that she was “putting out all kinds of misinformation.” Those statements have no basis in fact, are false, and are plainly designed to make her look bad in front of her numerous supporters. Hence, this letter is your notice to ***cease and desist*** making any more defamatory statements about Ms. Dodson.

Additionally, in response to your threats to “trespass” Ms. Dodson from the Senior Center, please know that we would view any such action as unlawful, retaliatory and a violation of her right as a public member to use public resources.

Very truly yours,



Christopher Lundberg

CGL:lsf

Cc: Client