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RUSSELL J. G. AMSBERRY
BOARD CERTIFIED
FAMILY LAW
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WWW.AMSBERRYLAW.COM
EMAIL: [redacted]

July 12, 2019

VIA EMAIL & REGULAR MAIL:

Ingeborg Conley – [redacted]
Daniel West – [redacted]
Andrew Camplen – [redacted]
John Shipley – [redacted]
Jeffrey Rankin – [redacted]
Patricia Hewitt – [redacted]
Douglas Edwards – [redacted]

Ingeborg Conley
P.O. Box 14468
Austin, Texas 78753

Daniel West
P.O. Box 14468
Austin, Texas 78753

Andrew Camplen
P.O. Box 14468
Austin, Texas 78753

John Shipley
[redacted]
Poteet, Texas 78065-4125

Jeffrey Rankin
809 Oak Street
Jourdanton, Texas 78026

Patricia Hewitt
[redacted]
Jourdanton, Texas 78026

Douglas Edwards
809 Oak Street
Jourdanton, Texas 78026

Re: *Steve Mueller and Stephanie Pino and Libelous/Slanderous Allegations of Their Theft from the VFW*; Our File No. 08746.001

Dear Ms. Conley et al:

My firm represents STEVE MUELLER and STEPHANIE PINO, who have retained me to assert a claim against you for libel. This is notice of my clients' claim and attempt to resolve this matter without litigation. This letter also serves as my clients' demand for retraction under Texas Civil Practice & Remedies Code § 73.055 *et seq.*

On or about April 15, 2019, you published a defamatory statement about my clients in E100, E105 Report of Investigation, E105 Attachment 36, 37, 38, 39, 40 E106, E107 and E129 to members of his VFW Post and thereafter, based on information and belief, leaked news of the closure of Mr. Mueller's Post and misguided, untrue statements of both he and Ms. Pino engaging in self-dealing and theft of VFW monies – made with careless disregard for the truth or alternatively with malicious intent. You accused both Mr. Mueller and Ms. Pino of diverting approximately $10,101.05 USD from the VFW for their sole, exclusive personal use and benefit.

This statement was defamatory to my client at all times relevant, the VFW Post to which Steve Mueller was Commander maintained books reflective of all transactions which concerned the Post. These books were reviewed and approved by the trustees of the Post. Further, you had an opportunity and directly or indirectly did in fact review and approve the Post's books in the fall of 2018, without any complaint or concern raised.

Because of your defamatory statement, Ms. Pino has incurred actual damages tantamount to the loss of her employment position, when she was terminated after news of her arrest based on the same allegations that form the basis of this demand letter. Mr. Mueller stands to suffer actual damages which have still yet to be fully manifested, as several contracts that he has had including design-build of Veteran Posts (Eagles Nest in Pleasanton, Texas); Veteran Activity Center in Pleasanton, Texas; low to moderate income veteran housing developments in Jourdanton and Austin, Texas as well as Esopus, New York, and a veteran food bank in Atascosa County, have been rescinded and repudiated. The costs of the US Veteran Housing Program™, US Veteran Council™, Atascosa Veteran Council™, Atascosa County Veteran Food Bank™ and Mr. Mueller's architectural firm, Universal Design Consortium, LLC, has yet to be fully calculated but is well in excess of $1,000,000 USD.

My clients desire to resolve this dispute without filing a lawsuit, which would include all four levels of the VFW, as the closure of the Post and confirmation of allegations against both Mr. Mueller and Ms. Pino has been effectively endorsed, ratified and approved at each level of the organization. Therefore, we request that you retract the defamatory statement that you published and give notice to any insurance carriers to whom you have coverage for any knowing, intentional misfeasance, gross negligence or negligence as related to the handling of this dispute and produce a copy the declaration pages to such policies, which provides coverage for any of my clients' actual damages and other related expenses. The retraction must be published in the same manner and medium as your original publication or in a manner and medium that reaches substantially the same audience as the original publication. Given the exposure which your underlying false claims of theft

have evolved into facebook submissions by the Atascosa Police Department, as well as an airing on the local San Antonio televised news outlets, radio outlets, Associated Press throughout the state of Texas, the retraction would have to be akin to the publication that has through your direct and indirect efforts gone viral.

If the publication is not published within thirty (30) days of receipt of this demand, my clients efforts to resolve this amicably shall be construed as being wholly rejected and you will give them no alternative than to institute suit and pursue in addition to actual damages, exemplary damages which are provided for and warranted under TEX. CIV. PRAC. & REM. CODE §73.001 *et seq.* against you, individually, and the VFW. I look forward to hearing from you soon.

Sincerely,

/s/ Russell J. G. Amsberry
Russell J. G. Amsberry