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August 18, 2021

Tad Berman

Via E-Mail: samberman1960@gmail.com

Re: Our client, Mrs. Amy Solares

Mr. Berman:

You are hereby directed to cease and desist making false and defamatory statements about our client, Mrs. Amy Solares.

Mrs. Solares is a respected professional in this community and in the charitable gaming industry. You have been making false and defamatory statements designed to damage her personal and professional reputation and integrity. Your statements were clearly made to damage her integrity as she performs her duties as an active member of the Virginia State Charitable Gaming Board.

Under the laws of the Commonwealth of Virginia, it is unlawful for an individual to make deliberate, malicious and unfounded statements which impute to a person unfitness to perform the duties of an office...or those which prejudice such person in his or her profession or trade.

Your defamatory statements include but are not limited to the recent statements you made during a state joint sub-committee addressing charitable gaming matters; "...as we speak there is a member of the board who is conducting illegal poker games, cash games at their location in Virginia Beach it has been brought up repeatedly by Matt Benka brought it up in a letter that I'll provide this committee and it has been referenced other occasions too to the Charitable Gaming Board but the Charitable Gaming Board has just looked the other way even though this woman is on the board and allowed this to continue".

Mrs. Solares has never conducted any poker games, legal or otherwise. Your statement to the contrary was false, malicious and defamatory. Although you did not state Mrs. Solares' name during the hearing, it was obvious that your statements were "of and concerning" Mrs. Solares.

Be advised this letter is being sent without prejudice to Mrs. Solares' right to sue you for defamation per se.

Sincerely,



Douglas E. Kahle, Esq.

Cc: Amy Solares

Delegate Paul E. Krizek, Chairman of the Charitable Gaming Board (via e-mail)
Senator John J. Bell, Vice Chairman of the Charitable Gaming Board (via e-mail)