

# LAW OFFICES OF FRIEDMAN & ABRAHAMSEN



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February 14, 2019

*By E-Mail and U.S. Mail*

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Mr. Garrett L. Dennis  
Office of the City Council  
117 W. Duval Street, Suite 425  
Jacksonville, FL 32202

Dear Commissioner Dennis:

This law firm represents Mr. Brian Hughes. If you are represented by legal counsel, please direct this letter to your attorney immediately and have your attorney notify us of such representation.

**You are hereby directed to CEASE AND DESIST ALL DEFAMATION OF BRIAN HUGHES' CHARACTER AND REPUTATION.**

Mr. Hughes is an educated, respected professional in the community. He has spent a lot of time serving the community in his profession and building a positive reputation. You have engaged in spreading false, destructive, and defamatory rumors about him. Moreover, your actions are malicious and are not part of your legitimate duties as a public officer.

It is unlawful to engage in defamation of another's character and reputation. Defamation consists of: (1) a statement that tends to injure reputation; (2) communicated to another; and (3) that the speaker knew or should have known was false.

Your defamatory statements involved repeated "tweets" through the Twitter platform. These tweets involved knowingly false allegations by you that Mr. Hughes has engaged in illegal, outside employment and that he continues to work on campaigns while serving in his role as Chief of Staff to the Mayor of Jacksonville.

Accordingly, we demand that you (A) immediately cease and desist your unlawful defamation of Brian Hughes and (B) provide us with prompt written assurance within ten (10) days that you will cease and desist from further defamation of Brian Hughes' character and reputation.

If you do not comply with this cease and desist demand within this time period, Mr. Hughes is entitled to seek monetary damages and equitable relief from you for your defamation. In the event you fail to meet this demand, please be advised Mr. Hughes has asked us to communicate to you that he will pursue all available legal remedies, including seeking monetary damages, injunctive relief, and an order that you pay court costs and attorney's fees. Your liability and exposure under such legal action could be considerable.

Before taking these steps, however, my client wished to give you one opportunity to discontinue your illegal conduct by complying with this demand within ten (10) days.

I recommend that you consult with an attorney regarding this matter. If you or your attorney have any questions, please contact me directly.

Sincerely,

***Tiffany R. Cruz***

Tiffany R. Cruz, Esq.