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STANFORD G. GANN, JR.

TELECOPIER 410-339-5762

Writer's Direct Dial Number
410-321-4645

March 1, 2006

VIA HAND-DELIVERY

Mr. James F. Archey
Box 1417 Calvert Road
Chester, Maryland 21619

RE: Defamation against Ms. Connie C. DeJuliis

Dear Mr. Archey:

Please be advised that this Office represents Ms. Connie C. DeJuliis in connection with defamatory statements you have made and publicized against her. Ms. DeJuliis and I take such actions quite seriously. We understand you have maliciously spread lies about Ms. DeJuliis, including but not limited to unfounded and erroneous allegations about her actions in connection with her employment. In addition, Ms. DeJuliis has seen and obtained a copy of your defamatory comments that you published on the internet and Local37MembersVoice website. Your website does not provide you a license to defame or attempt to inflict harm or offense; nor does the LMRDA give you the right to defame.

Your defamatory and malicious conduct is cowardly, offensive and will not be tolerated now or ever. It is bad enough for you to spread lies of others by word of mouth in an attempt to hide behind statements that you know or should know are without merit, basis or support. It is, however, another level to do so by way of the internet and mass delivery.

Your endless rantings would be laughable if not so serious, potentially harmful and spiteful. As a result, demand is hereby made on behalf of Ms. DeJuliis for you to cease and desist further communications and to rectify your unlawful conduct to date as follows:

1. Identify all web-sites you have created over the past three years;
2. Identify all persons involved in setting up each such web-site;
3. Identify all subscribers to each website and all persons who have provided information, verbal or written in any form, for each site;
4. Enable website to prevent exit from Home Page to any other location or link on web site;
5. Publish on each home page of each web-site a notice (subject to our approval) that all negative or unfavorable comments attributed to you about Ms. DeJuliis were false, without basis and made solely to embarrass them because you are bitter for no legitimate reason;
6. Issue an apology letter (subject to our approval) posted on each home page of each website;
7. Post apology letter and notices we approve on each web-site as we direct;
8. Pay Ms. DeJuliis the sum of \$5,000, plus all costs and legal fees incurred.

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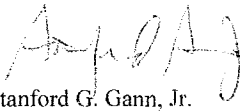
LEVIN & GANN, P.A.

Should you fail to comply with this demand within five (5) days from the date of this letter, Ms. DeJuliis will file suit against you and pursue all legal and appropriate remedies and damages to the fullest extent allowed by law. In the event that suit is filed, we will obtain the information sought by way of requests for documents, subpoenas and depositions, if necessary. To his credit, as you apparently are aware, Mr. O'Donnell issued an apology letter to Ms. DeJuliis and provided assurances he would not repeat his wrongful actions in the future. You, however, obviously view the recognition of errors and the taking of steps to rectify such errors as "selling ones soul." You obviously view "soul" very differently than I do.

As I am sure you must know, Ms. DeJuliis is neither posturing nor willing to delay a resolution beyond the time specified above for compliance. After that time, suit will be filed and vigorously pursued. She has readied substantial funds to curb your activities and to rectify this matter promptly. You can either persist in your wrongful conduct or resolve this as set forth above before it becomes an expensive and time consuming piece of litigation. The choice is yours.

Your lack of appropriate and timely response will determine the next step as no extensions will be tolerated. I look forward to your compliance and a productive response.

Very truly yours,



Stanford G. Gann, Jr.

SGGJR/tb

cc: Ms. Connie DeJuliis