

Paul Berger, Esq.

P.O. Box 7898 ◦ Delray Beach, FL 33483 ◦ Tel. 561-414-4570

October 21, 2014

Mr. Patrick Reilly, Esq.
Holland & Hart
9555 Hillwood Drive
2nd Floor
Las Vegas, NV 34227

RE: Public Integrity Complaint filed against Sen. Justin Jones

Dear Mr. Reilly:

Please be advised that I represent Mr. Juravin and this letter is in response to your letter dated October 18, 2014. Mr. Juravin believes that all of the allegations made in the Public Integrity Complaint are true or he had a good faith basis to believe that they are true.

As you are aware, Nevada pornography attorney Marc Randazza posted the following statement on his personal blog on or about October 6, 2014:

Two years ago, my partner, Ron Green, introduced me to a guy. That guy's name was Justin Jones. Justin was running for State Senate in Nevada. ... I shook his hand and said "if you will sponsor an Anti-SLAPP bill, I'll vote for you, and I'll contribute to your campaign." He promised me that he would do so. Within days of taking office, he made good on his promise.

We believe that this public statement is an admission of a bribe that Mr. Randazza offered to Senator Jones that was accepted and acted upon. To the best of my knowledge it is against the law in every state in this great Nation to offer a public official any type of monetary compensation in exchange for sponsoring and voting a certain way on a bill. It is certainly against the law in Nevada. Please provide me with an explanation as to how this is not an admission of a bribe or that a *quid pro quo* relationship did not exist.

There can be no dispute that Senator Jones sponsored the Senate Bill 286, advocated on its behalf, and now Mr. Randazza has given money to his campaign and is actively attempting to raise money for Senator Jones. As you are aware, the truth is a defense to defamation. Moreover, it appears that Mr. Randazza and Senator Jones are now trying to hide the truth as all previously made statements issued online by Mr. Randazza about Senator Jones have been

removed and the fundraising reception sponsored by Mr. Randazza and his law Partner Ronald Green has disappeared from the Internet despite being approved and paid for by the Friends for Justin Jones and linked to <http://www.jonesfornevada.com> website.

In regards to timing of the complaint, Mr. Randazza posted the above quote on his blog earlier this month. Timing is merely due to the acts of Mr. Randazza and nothing more. Upon reading the blog, Mr. Juravin responded as any conscientious public citizen would do and filed the Complaint. Thus, there can be no questioning of his timing or motives. The American electoral system only works when all citizens are vigilant and protect the rights of every voter. Mr. Juravin should be applauded as a "Citizen Hero" who will not back down from doing the right thing, even in the face of threats of malicious and retaliatory lawsuits from powerful State Senators.

However, as Senator Jones is concerned about timing of this matter, I would suggest that we both request that the Nevada Attorney General's Office expedite the investigation into the allegations of the Complaint. I trust that if Senator Jones wants to resolve this matter immediately, he will request that an investigation is accelerated.

With regard to the lawsuit, we believe that it is baseless and Senator Jones is merely trying to restrain free speech for his own political gain. It is ironic that the Anti-SLAPP bill that Senator Jones claims he championed will now be used to protect the speech of an individual that he wants to intimidate for doing the right thing.

As Senator Jones has threatened Mr. Juravin with litigation and evidence in this matter is being removed, please consider this letter as notice that we are requesting that you hold and preserve all relevant records in respect to this matter. We hereby demand that you preserve all documents, videos, pictures, electronic records, phone records, tangible things and electronically stored informed related to this matter. Specially, please retain all records regarding communications, including electronic, telephonic, calendars, meeting notes, and any and all records of communications between Senator Jones and Mr. Randazza or Mr. Green. In addition please retain all records regarding communications, including electronic, telephonic, calendars, meeting notes, and any and all records of communications between any employees, volunteers or contractors of Senator Jones and Mr. Randazza, Mr. Jones or any employee of the Randazza Law Group. Please retain all fund raising records, including all online marketing and fundraising efforts made by Senator Jones or the Friends for Senator Jones. Please retain all records regarding the passage of Senate Bill 286.

You are directed to immediately initiate a hold for potentially relevant documents and tangible things, and act diligently in good faith to secure compliance with this request. You are directed to immediately identify and suspend any features in your information systems that, in routine operation, cause the loss of potentially relevant information. This includes purging the contents

of e-mail repositories; using data or media disposal, erasure, or encryption; overwriting, erasing, destroying, or discarding backup media; and purging online storage repositories.

We would be happy to discuss this matter with you should your client wish to resolve this matter.

Respectfully,

A handwritten signature in black ink, appearing to be 'P. Berger', with a long, sweeping horizontal line extending to the right.

Paul Berger, Esq