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August 21, 2019

Mr. Tony Sees
[REDACTED]

Re: Sworn Complaint; Tennessee Ethics Commission Case No. C2019-005

Mr. Sees:

It has come to my attention that you filed a sworn complaint with the Tennessee Ethics Commission last week accusing my sister and me of several "violations." The information contained in your complaint is blatantly false, malicious and defamatory, and we will not tolerate it. My sister has not worked with me or received income from my law business since early 2016 when she became the clerk of Smyrna's municipal court. In fact, she has not represented any clients since that time. Additionally, your assertion that either of us is engaged in "consulting services" as defined in Tennessee Code Annotated § 2-10-122 is completely inaccurate.

Based on analysis of the document and other information I have received, we have reason to believe that the author of the handwritten allegations was not actually you, but was in fact a person or persons other than yourself.

Now that you have accurate information, we will give you five days to do the following: 1) Withdraw your false complaint from consideration at the Tennessee Ethics Commission, in writing, and confirm to the Commission that you had no basis for making such a claim; 2) Disclose the identity of the person or persons who gave you this sworn complaint to file; 3) Disclose the identity of the person or persons who hand wrote the information contained within the complaint; and 4) Disclose the identity of each and every person with whom you have had contact about your complaint.

Failure to timely comply with this demand will result in legal action for defamation. We will eagerly await your response. My office phone number is (615) 459-6135.

Sincerely,



Robert S. Stevens

cc: Tennessee Ethics Commission