



2200 Ross Avenue, Suite 2800
Dallas, Texas 75201
Telephone: 214-740-8000
Fax: 214-740-8800
www.lockelord.com

W. Scott Hastings
Direct Telephone: 214-740-8537
Direct Fax: 214-756-8537
shastings@lockelord.com

April 10, 2021

VIA EMAIL: ted.tredennick@dtlawyers.com

Ted Tredennick
DANIELS & TREDENNICK, PLLC
6363 Woodway, Suite 700
Houston, Texas 77057

Re: Kanakuk Kamps – No More Victims, LLC

Dear Mr. Tredennick:

I am in receipt of your letter dated April 9, 2021 on behalf of Kanakuk. As I told you on the phone yesterday, you have the facts completely wrong. My client, No More Victims, LLC, is a Kanakuk victim-supported organization. It is not owned or operated by the Pennsylvania law firm that is mentioned in your letter. My client's goal and interest is in promoting free speech and debate regarding the events that happened at Kanakuk. It is clear from your letter that Kanakuk's goal, once again, is to suppress speech and to prevent the truth from being told.

Although my client disagrees with almost everything you write in your letter, I wanted to address one topic that can be easily resolved. My client is not trying to interfere with anyone's contracts with Kanakuk. If a victim wants to keep the events that happened to them at Kanakuk private and confidential, they are free to do so. But for those victims who want to speak and share the truth about what has happened, they should also be free to do so. If Kanakuk is willing to let the truth be known, it only requires a simple, public statement such as the following:

Kanakuk and its leadership (including Joe White) agree that any victims of sexual abuse and their families should be free to speak about any inappropriate conduct that they have suffered. Kanakuk and its leadership (including Joe White) hereby give notice and confirm that they will not assert or seek to enforce any non-disclosure agreements ("NDA") or non-disparagement clauses against anyone who wants to speak about

Atlanta | Austin | Boston | Chicago | Cincinnati | Dallas | Hartford | Hong Kong | Houston | London | Los Angeles
Miami | Princeton | New Orleans | New York | Providence | San Francisco | Stamford | Washington DC | West Palm Beach

April 10, 2021

Page 2

Kanakuk, its leadership, or the events that have happened. Kanakuk and its leadership will continue to respect the privacy of those who elect to maintain confidentiality, but for those who wish to speak, they are free to do so without restriction from any NDA or non-disparagement clause they may have signed.

Please let me know whether Kanakuk is willing to issue such a release from any NDAs or non-disparagement clauses that have been signed by the victims of abuse at Kanakuk or their families.

Should Kanakuk decide to pursue litigation as you have threatened, please know that my client will vigorously defend its rights, including its First Amendment right to speak on this matter of public concern. My client will also seek sanctions against Kanakuk for any attempts to use litigation for improper purposes, such as to suppress speech.

If Kanakuk decides to proceed with litigation, you are hereby advised that my client is a North Carolina LLC with its principal place of business in Dallas, Texas. Its owners are also in Texas. Kanakuk has threatened litigation in Missouri. My client has no operations, facilities, or ownership in Missouri. Thus, the Missouri courts would be an improper venue for any disputes between these parties. My client is also not subject to personal jurisdiction in Missouri. So, unless you want to waste everyone's time and money, the proper jurisdiction and venue between these parties would be in Dallas.

Very truly yours,



W. Scott Hastings

WSH/ms