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April 9, 2021

Via email: shastings@lockelord.com

Mr. Scott Hastings
LOCKE LORD
2200 Ross Avenue, Suite 2800
Dallas, TX 75201

RE: Cease & Desist—No More Victims, LLC
www.FactsAboutKanakuk.com

Dear Mr. Hastings:

Please forward this cease & desist letter to your client—No More Victims, LLC.

As you are aware, my law firm is outside legal counsel for Kanakuk Ministries (“Kanakuk”). This morning we spoke briefly about your client and its website.¹ Put simply, your client’s website violates the law in several areas. It may also violate the rules governing attorney advertising, solicitation, and barratry if it is subsequently determined that the real entity behind your client is a mass tort law firm—likely, at least in part, the firm of [REDACTED]²

¹ <https://factsaboutkanakuk.com>

² Exhibit 1—Automated email from www.FactsAboutKanakuk.com. [REDACTED]

If this is the case, your client’s website will be revealed to be nothing more than an attorney advertisement trawling for sex abuse clients. Your client’s disingenuous use of the woke party line—transparency, accountability, repentance—will be revealed for what it is: a ploy. Your client’s desire for a “full and robust discussion of the events that happened at Kanakuk” will be seen as identity politics, “cancel culture,” and greed. Make no mistake, Kanakuk will defend itself against your client’s blatant attempt to “kancel” it.³ Your client’s website is analogous to the Wisconsin protestors—chanting anti-racism slogans—toppling a statue of an anti-slavery activist.⁴ Since confronting sex abuse more than a decade ago, Kanakuk has been a leading advocate for comprehensive background checks and screenings. It has been an industry leader in this regard. It has been completely transparent as to the events that occurred. It chose to educate other organizations on what to look for with regard to potential abuse. But like the Wisconsin protestors, your client acts and reacts in a manner that is reckless and uninformed and ruthless. It is mob rule plain and simple.

While your client does have a “First Amendment right to speak and write on matters of public concern,” it does *not* have the right to defame Kanakuk with rumors disguised as “facts.”⁵ Rest assured, Kanakuk is fully prepared expose your client’s deception and ulterior motives. That I can assure you.

Your client’s website violates the law in the following ways:

I. Defamation

Your client’s website promotes a concerted misinformation campaign against Kanakuk under the guise of social justice.⁷ In what can only be viewed as troubling lack of self-awareness, your client’s concern for “facts” contradict the website’s disclaimer: “The material is for informational purposes only and is *not guaranteed to be correct, complete, or up to date.*”⁸ Such a disclaimer absolutely and positively causes confusion to anyone who visits the site while simultaneously damaging Kanakuk’s reputation nationwide. Plus, because the website repeatedly states the information “is not guaranteed to be correct,” your client concedes the allegations were made with a “reckless disregard for the truth.”⁹ The result is a confusing narrative that is illegal. On one hand, your client’s website offers “facts;” on the other, the information is not necessarily “correct, complete, or up to date.” A judge and jury will consider this mixed message with a certain amount of disdain and view the website for what it really is.

Below is a developing list of twenty (20) actionable defamatory statements made on your client’s website:

³ <https://factsaboutkanakuk.com/petition/>

⁴ <https://www.forbes.com/sites/isabeltogoh/2020/06/24/madison-protesters-condemned-for-toppling-statue-of-anti-slavery-activist/?sh=81eaabb69614>

⁵ Exhibit 2—Correspondence for Locke Lord’s Mr. Scott Hastings, April 6, 2021.

⁷ <https://factsaboutkanakuk.com>

⁸ <https://factsaboutkanakuk.com/disclaimer/>

⁹ *Overcast v. Billings Mut. Ins. Co.*, 11 S.W.3d 62, 70 (Mo. 2000).

1. CLAIM: “For decades, Joe White and other camp leaders knew about and facilitated sexual abuse against scores of children, a pattern that may continue to occur to this day. The same leadership is still at the helm — without repentance, without accountability, and without transparency.”¹⁰

CORRECTION: Your client’s suggestion that Kanakuk “facilitated sexual abuse” is purposely sensational in order to garner attention, intellectually dishonest, unsupported by evidence, and made in bad faith. To suggest Kanakuk is “without repentance, without accountability, and without transparency” is also blatantly untrue, a clear misrepresentation of deposition testimony, and contrary to Kanakuk’s core values. These specific allegations are shameful and mean-spirited.

Furthermore, Kanakuk’s leadership was wholly unaware of the abuse that occurred. Kanakuk was thoroughly investigated by law enforcement and no one beyond those charged were ever found culpable. Kanakuk has and will continue to work diligently to help victims of abuse and their families heal. Kanakuk remains vigilant in screening and monitoring its employees for even the slightest hint of abuse or child attraction.

2. CLAIM: “Non-disclosure agreements (NDAs) and significant financial settlements have concealed the truth in order to preserve a ministry brand and economic engine.”¹¹

CORRECTION: First, your client’s website suggests Kanakuk required NDAs. This is blatantly false. To be clear, there are confidential settlement agreements in which the victims, almost always represented by counsel, negotiated to keep settlement information confidential after lawsuits had been threatened or filed. Your client also knew, or should have known, the victims’ publicly filed lawsuits contain the allegations of sexual abuse.

Second, the victim’s allegations in a petition or complaint are supposed to be supported by evidence. These lawsuits remain in the public domain, but the website uses these lawsuits as factual sources when they are only allegations. In other words, your client is guilty of confusing hearsay with fact.

Finally, the Taney County Prosecutor publicly prosecuted abusers with evidence obtained from the victims. There is no truth that NDAs or agreements of any kind prevented victims from stating their claims or presenting evidence. Thus, the website’s claim concerning NDAs is defamatory.

¹⁰ <https://factsaboutkanakuk.com>

¹¹ *Id.*

3. **CLAIM:** “Numerous former staff members are convicted child sex abusers, with many others suspected.”¹²

CORRECTION: Since its founding in 1926, Kanakuk has employed over 50,000 summer staff. Despite Kamp’s best prevention efforts, there were two employees convicted of the sexual abuse of minors at camp. The extent of abuse by Mr. Newman was unknown and shocking. As a result, Kanakuk created the Child Protection Plan (CCP), which includes over 340 check points, practices, and standards to protect kids. It was the CCP plan that enabled Kanakuk to swiftly identify the second abuser, terminate his employment, and coordinate with law enforcement.

While all abuse is unacceptable and abhorrent, Kanakuk’s CCP significantly exceeds qualitative and quantitative expectations relative to other youth serving organizations. Kanakuk remains vigilant on preventing any incidents of abuse from ever occurring again. Your client’s website unfairly references other former staff members who have been convicted of abuse long after leaving Kanakuk implying it knowingly was aware such individuals were potential abusers while on staff. Your client’s assumption is both incorrect and defamatory.

4. **CLAIM:** “Former staff members solicited child sexual abuse material (“child porn”) from campers.”¹³

CORRECTION: This allegation is blatantly false, purposely inflammatory, and clearly defamatory. It is completely fabricated.

5. **CLAIM:** “Repeated failure to abide by mandatory reporting laws for child safety, molestation and abuse.”¹⁴

CORRECTION: This is blatantly false. Kanakuk has *always* abided by the mandatory reporting laws concerning abuse—sexual or otherwise. Kanakuk has *never* been found deficient in this regard.

6. **CLAIM:** “A lawsuit filed on behalf of John Doe XII alleging sexual assault is filed against former Kanakuk Kamps Director Pete Newman, currently serving two life sentences plus 30 years in Missouri state prison for child sexual abuse.”¹⁵

CORRECTION: The lawsuit does not name Kanakuk as a defendant.

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

¹⁵ <https://factsaboutkanakuk.com/lawsuits/>

7. CLAIM: “A \$20 million judgment is awarded in the Doe IX case, making it the top plaintiff’s judgment in Missouri for that year.”¹⁶

CORRECTION: This default judgement was neither against Kanakuk nor Mr. White.

8. CLAIM: “Former Kanakuk staff member Corbie Dale Grimes is fired for sexual misconduct with campers, but since he was not reported to law enforcement, Grimes went on to work in youth ministry until a 2002 conviction.”¹⁷

CORRECTION: Mr. Grimes was terminated by Kanakuk for inappropriate behavior and poor judgment. In 1989, his actions did not constitute a “reportable offense” in a criminal context.

9. CLAIM: “White uses the title of ‘Dr.’ publicly, but his doctoral degrees were honorary only, from Bellhaven University in Jackson, Mississippi, and Southwestern Baptist University in Bolivar, Missouri.”¹⁸

CORRECTION: Mr. White does not personally refer to himself as a “Dr.” In fact, he simply prefers to be called “Joe.” Anyone even vaguely familiar with Kanakuk knows this. He has consistently disclosed that his formal academic education only consists of a Bachelor of Science from Southern Methodist University and his two honorary doctorates are simply that—honorary.¹⁹

10. CLAIM: “Joe White is neither a licensed counselor nor an ordained minister, although he practices and claims expertise in counseling and pastoral care.”²⁰

CORRECTION: University Baptist Church in Fayetteville, AR ordained Mr. White. Further, Mr. White has worked with kids, college students, and families since 1976 through Kanakuk and other ministries.²¹ He is a highly sought-after speaker and author of more than 20 books on parenting and Christian faith.²² He has never professed to be a licensed counselor.

11. CLAIM: “There have been a number of alleged and convicted sex offenders attached to Kanakuk Kamps and its family of ministries over the past several decades, each incident quietly swept under the rug. While former K-Kountry director Pete Newman, the camp’s most prominent serial predator, was

¹⁶ <https://factsaboutkanakuk.com>

¹⁷ <https://factsaboutkanakuk.com/known-abusers/>

¹⁸ *Id.*

¹⁹ <https://www.linkedin.com/in/joewhitekanakuk/>; <https://www.simonandschuster.com/authors/Joe-White/40753547>; <https://www.tyndale.com/authors/joe-white/719>; <https://joewhitekanakuk.com/about/>

²⁰ <https://factsaboutkanakuk.com/about-kanakuk/#joe>

²¹ <https://joewhitekanakuk.com/about/>

²² *Id.*

sentenced to life in prison for the abuse of dozens of boys, there is more to this story.”²³

CORRECTION: In its nearly one-hundred-year history, there have been only two individuals who have been convicted of sexual abuse while employed at Kanakuk. When these crimes became known, Kanakuk reported these crimes and worked with prosecutors to convict these individuals. Kanakuk has never minimized or denied their reported abuse.

12. CLAIM: “Based on evidence introduced at trials and other court hearings, there are likely to be dozens of NDAs and similar tools demanded and enforced by Joe White and the Kanakuk legal team. As a result, the full scope of sexual abuse at Kanakuk Kamps, and the failures of its leadership, may never be known. The camp controls the narrative.”²⁴

CORRECTION: Kanakuk has never used NDAs to hide the details of abuse. The awful allegations against Kanakuk were filed publicly. Plus, there is a considerable paper trail online of the reported abuse and lawsuits. The criminal prosecution of former staff was equally, if not more so, public, and their illegal activities were openly prosecuted and covered by the local television stations and newspapers for many months. In all but one instance, Kanakuk entered into a confidentiality agreement in cooperation with the victim to protect the victims’ privacy and often at the request of the victim’s legal counsel.

13. CLAIM: “While scholarships to Kanakuk Kamps are not available for KAA-eligible families, Joe White does offer such scholarships to military children and to families who are known to have endured Kanakuk sexual abuse.”²⁵

CORRECTION: Kanakuk does not discriminate against any camper attending its camps. For decades, Kanakuk has sought to serve underserved youth from urban areas (including minorities) and provided scholarships to campers who otherwise could not afford camp. Each year, Kanakuk provides over \$2 million annually in scholarships for a variety of reasons, including family hardship, financial need, military, and fallen soldier families.

14. CLAIM: “Kanakuk Kamps released its first written policy on preventing sexual abuse, 19 years after materials to educate staff were readily available and more than 23 years after the “Camp Directors Guide: Preventing Sexual Exploitation of Children” was published by the U.S. Department of Justice.”²⁶

²³ <https://factsaboutkanakuk.com/about-kanakuk/#about>

²⁴ <https://factsaboutkanakuk.com/petition/>

²⁵ <https://factsaboutkanakuk.com/petition/>

²⁶ <https://factsaboutkanakuk.com/timeline-of-abuse-and-negligence/>

CORRECTION: Kanakuk has long had abuse prevention and reporting policies and procedures in place that met the industry and insurance standards including definitions and statistics of abuse, characteristics and signs of victims or abusers, and reporting instructions.

In response to the abuses that became known in 2009, Kanakuk dedicated significant financial resources and spent countless hours of research and development to further advance its child protection efforts in what is the CPP.

In 2011, Kanakuk turned the CPP into a mission to train and equip other youth serving organizations to advance their child protection, and over 600 organizations have received the training and materials to date. And the CPP continues to evolve.

15. CLAIM: “Ed Ringheim, a volunteer for one of Kanakuk’s K-Life programs, is charged with eight felony counts of sexual assault and sentenced to 15 years in Florida state prison.”²⁷

CORRECTION: K-Life is not a Kanakuk “program,” but an independent 501c3.

16. CLAIM: “At Newman’s criminal trial, Joe White testifies that nudity with children, such as naked basketball, may not constitute sexual abuse. He states in court that he didn’t consider sexual abuse as a possible issue at Kanakuk Kamps.”²⁸

CORRECTION: This statement is false. Mr. White did not testify at Mr. Newman’s criminal trial. Mr. White condemns any and all nudity involving children. Prior to 2009, he did not believe any sexual abuse had occurred at Kanakuk.

17. CLAIM: “Threatened with outside legal action, Newman writes a confession letter. Kanakuk leadership then confronts Newman, who initially reveals about 15 names of boys he had abused. They confiscate his laptop and terminate his employment, allowing him to leave without contacting law enforcement authorities.”²⁹

CORRECTION: Kanakuk contacted authorities promptly when they became aware of the first report of abuse. Kanakuk cooperated with authorities in the investigation and prosecution.

18. CLAIM: “In a signed statement, White admits he knew of Newman’s naked hot tub

²⁷ <https://factsaboutkanakuk.com/known-abusers/>

²⁸ <https://factsaboutkanakuk.com>

²⁹ <https://factsaboutkanakuk.com/timeline-of-abuse-and-negligence/>

sessions, mutual masturbation, and nude running through the camp with underaged victims but chose not to report the incidents to law enforcement.”³⁰

CORRECTION: Mr. White neither made these admissions nor would he ever make such statements in either a verbal or written context.

19. CLAIM: “Following Newman’s arrest on multiple charges involving sex with teenage boys over a 10-year period, White sends an email to Kanakuk families that stated Newman “is dealing with a personal family crisis” while asking them to respect his privacy and “keep [Newman] in your prayers.”³¹

CORRECTION: Kanakuk contacted authorities when it became aware of the abuse. Kanakuk cooperated with authorities in the investigation and prosecution. The email referenced was sent following Mr. Newman’s termination of employment, while the investigation was ongoing and prior to his arrest.

20. CLAIM: “It is unknown if Morgan abused any campers during his multiple years of affiliation with Kanakuk and his off-season residence on camp property.”³²

CORRECTION: Mr. Morgan lived on Kanakuk’s property for a short period while camp was *not* in session. He never had contact with campers.

II. Trademark Dilution through Tarnishment

Under the Lanham Act, your client’s unauthorized use of the registered trademark “Kanakuk” in the URL—www.FactsAboutKanakuk.com—tarnishes the mark to the point of dilution.³³ In order to prove this claim, Kanakuk will show it owns the famous and distinctive mark. This is plainly evident. And that your client’s misuse of the famous mark harmed its reputation or association.³⁴ This is also plainly evident. Your client will be forced to defend this claim requiring court appearances and multiple filings. This will be a time-consuming and expensive endeavor.

III. Tortious Interference with Contract

Your client’s website interferes with the settlement agreements that exist between Kanakuk and past sexual abuse victims. The website purports to be the “voice” of these victims. In fact, your client’s site states, “Our petition builds on that simple request to demand that

³⁰ *Id.*

³¹ *Id.*

³² <https://factsaboutkanakuk.com/known-abusers/>

³³ 15 U.S.C. § 1125(c)(1).

³⁴ *Id.* at § 1125(c)(2)(B), (C).

individuals and families who have settled with the camp be released from any NDAs or similar clauses, so they can choose to find healing in sharing their stories and connecting with other survivors.”³⁵ Have the “victims” authorized your client to speak for them? I suspect *not* all “victims” support your client’s desire to “create a place where victims of Kanakuk abuse can finally feel seen, believed and supported.”³⁶ I further suspect your client has illegally obtained and published confidential information on its website. If this is the case, your client is liable.

IV. Improper Attorney Advertising & Solicitation

Given the █████ firm is somehow involved, the website violates Pennsylvania’s Rules of Professional Conduct regarding attorney advertising, and likely violates other states’ rules as well. Not surprisingly, your client’s website goes to great lengths to obfuscate the █████ firm’s involvement. As you are aware, a lawyer’s advertisement must disclose its identity and geographic location.³⁷ It seems “truth and light” has its limits.³⁸ Further, while your client’s website lists “resources” of organizations in a “referral network,” it purposely omits the █████ firm.³⁹ Why is that? According to Pennsylvania’s Rules of Professional Conduct:

A lawyer shall not make a false or misleading communication about the lawyer or the lawyer's services. A communication is false or misleading if it contains a material misrepresentation of fact or law, or *omits a fact necessary to make the statement considered as a whole not materially misleading*.⁴⁰

Your client’s subterfuge is highly suspect. Mass tort firms—█████—often seek “leads” beyond their home turf via internet and google ad campaigns. Once the “leads” are qualified, these firms refer the “leads” to lawyers and firms licensed to handle them in return for part of the contingent fee. This is perfectly legal, but this practice must be disclosed. The █████ firm’s veiled use of a “lawyer referral service” —No More Victims, LLC—violate this rule.⁴¹ Indeed, the Pennsylvania State Bar will most likely not appreciate this advertising strategy.

Litigation regarding your client’s conduct is imminent. With this letter, your client is on formal notice and should notify its insurance carrier.

³⁵ <https://factsaboutkanakuk.com>

³⁶ *Id.*

³⁷ Pennsylvania’s Rules of Professional Conduct § 7.2(i) (“All advertisements and written communications shall disclose the geographic location, by city or town, of the office in which the lawyer or lawyers who will actually perform the services advertised principally practice law. If the office location is outside the city or town, the county in which the office is located must be disclosed.”).

³⁸ Exhibit 1—Automated email █████.

³⁹ <https://factsaboutkanakuk.com/resources/>

⁴⁰ Pennsylvania’s Rules of Professional Conduct § 7.2. (emphasis added).

⁴¹ *Id.* at § 7.7(a).

However, your client may avoid litigation if it complies with the following demands:

1. Identify the names and contact information of *all* owners of No More Victims, LLC and those responsible for the defamatory content on the FactsAboutKanakuk website;
2. Cease & desist from using the registered trademark—Kanakuk—in the URL: www.FactsAboutKanakuk.com;
3. Cease & desist making defamatory claims against Kanakuk that have no basis in fact and retract the identified defamatory statements identified;
4. Cease & desist contributing to the misinformation campaign against Kanakuk by no longer cooperating with other ill-informed and self-serving “journalists” like Nancy French⁴² among others;
5. Preserve and retain *all* documents relating to Kanakuk and your smear campaign against it for litigation purposes—including but not limited to “litigation holds” concerning email, text messages, audiovisual recordings, voice mails, drafts, notes, communications, documents, interview notes, sources, data, and electronically stored information of any kind that relate in any way to these matters. This applies to your client, its attorneys, its agents, its subcontractors, or employees under its supervision.

I look forward to your prompt response. If your client refuses my client’s demands or I do not hear from you within 48-hours from electronic delivery receipt of this letter, judicial intervention will follow. I’m in hopes your client will comply.

Very truly yours,



Ted Tredennick

⁴² <https://frenchpress.thedispatch.com/p/they-arent-who-you-think-they-are>

EXHIBIT 1

[REDACTED]

CAUTION: EXTERNAL EMAIL

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Thank you for reaching out. First of all, we want you to know that you are not alone. A lot of resources are available to you in your healing journey. We are so sorry you've endured abuse. It is normal to not disclose or know the extent of your abuse for many years, and you still have plenty of options regarding both counseling services and legal action. You've taken an important and brave step to come forward, and you can rest assured that the information you submitted here will be kept confidential. Because we do not share your information, you may choose to contact one or both of the following resources at your own pace (both of which are independent organizations from this website that specialize in sexual abuse issues):

The [National Center on Sexual Exploitation](#) (NCOSE) has context on Kanakuk Kamps abuse, and their victim advocates are prepared to take your call or email. The best way to reach NCOSE is 202-393-7245 or public@ncose.com, and your message will reach the right person, usually within a few hours. NCOSE exists to seek the healing and wellbeing of survivors. If you let them know your needs, they can refer you to relevant services available and connect you with other resources.

There are also survivors of Kanakuk sexual abuse specifically interested in pursuing legal action. The law firm of [REDACTED] is investigating some of these cases. Attorneys there are ready and available to answer any questions you might have, whether you ultimately pursue a lawsuit or not. Every member of their team is trauma-informed, and they

also have co-counsel in multiple states depending on each client's particular case and needs. If you call this law firm, you will be connected with a lawyer who works exclusively with survivors of sexual/physical assault, abuse and neglect. This is incredibly important because of how sensitive the nature of the conversation will be and how it can be another form of re-traumatization without proper guidance. The entirety of the conversation you have with an attorney is 100% confidential and protected by attorney-client privilege. The attorney will ask you to explain what happened for context, but you will not be pushed or forced to talk about anything you do not want to share. After hearing from you, the attorney will explain potential options, including a general description of the legal process. You will be in control of which path you take, but getting informed of your specific options may provide clarity as to which steps you take next, if any.

There are, of course, other well qualified services and firms available to help you too. The ones listed above are only suggestions who are already familiar with Kanakuk-related issues. Please let us know how it goes and if you need anything else. Healing awaits.

In truth and light,

No More Victims, LLC
FactsAboutKanakuk.com

[Redacted signature block]

[Redacted email signature block]

EXHIBIT 2



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April 6, 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 the letter that you forwarded to my office on April 5, 2021. My client has a First Amendment right to speak and write on matters of public concern, including the subject matters discussed on the website located at www.factsaboutkanakuk.com. My client believes that its website was thoroughly and well-researched before it was disclosed publicly. Given that Kanakuk claims that it wants to let the truth be known, it is surprising that Kanakuk would threaten to seek restraining orders to prevent a full and robust discussion of the events that happened at Kanakuk.

As my assistant likely told you when you called my office yesterday, I am in the middle of an injunction proceeding. I will gladly talk on Friday after the hearing is over. Until then, please know that my client is in possession of your letter and is evaluating the comments that you raised.

Very truly yours,

W. Scott Hastings

WSH/ms