

JAMES BOPP, JR.
jboppjr@aol.com

THE BOPP LAW FIRM, PC
ATTORNEYS AT LAW

CORRINE L. PURVIS
Cpurvis@bopplaw.com

THE NATIONAL BUILDING
1 South Sixth Street
TERRE HAUTE, INDIANA 47807-3510
Telephone 812/232-2434 Facsimile 812/235-3685
www.bopplaw.com

Indianapolis Office:
6470 Mayfield Lane
Zionsville, IN 46077
Telephone/Facsimile
(317) 873-3061

November 18, 2016

Jan Halper-Hayes
jan@presageadvisory.com

Re: Cease and desist from representing
yourself as Vice President of
Republicans Overseas

Dear Ms. Halper-Hayes,

As General Counsel for Republicans Overseas, I am contacting you to inform you that Republicans Overseas hereby demands that you cease and desist from claiming to be, or informing others, that you are the current Vice President of Republicans Overseas. Republicans Overseas believes that you have repeatedly and falsely communicated and represented that you are the current Vice President of Republicans Overseas. We demand that you immediately cease and desist from this conduct and inform those that you have falsely told that you are Vice President of Republicans Overseas that, since May 6th, you have not held that position.

We believe that your misrepresentation gives Republicans Overseas a claim of deceit against you. Deceit is actual fraud and consists of “a misrepresentation or a material omission of fact which was false and known to be false by defendant, made for the purpose of inducing the other party to rely upon it, justifiable reliance of the other party on the misrepresentation or material omission, and injury.” *Lama Holding Co. v. Smith Barney, Inc.*, 668 N.E.2d 1370, 1373 (N.Y. 1996) (citations omitted). Fraudulent deceit results from either a willful or reckless misrepresentation or a suppression of material facts with an intent to mislead. *Ford Motor Co. v. Sperau*, 708 So. 2d 111 (Ala. 1997).

On May 6, 2016, in an e-mail to members of Republican Overseas Board, you wrote that you had resigned from your positions with Republicans Overseas. This resignation was accepted by the Republicans Overseas Board. As a result, effective May 6th, you were no longer Vice President of Republicans Overseas, nor were you on the Board of Republicans Overseas.

Upon your resignation, you can no longer use the title with Republicans Overseas that you once held. You were told specifically that you can no longer use your title by the President of Republicans Overseas. But you have done just that. On BBC’s “Question Time” from Southend-On-Sea, you were introduced as “the Vice President of Republicans Overseas” and you did not correct this error.

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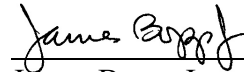
You have repeatedly represented that you are Vice President of Republicans Overseas, and, when necessary, you failed to disclose that you no longer hold that position. By doing so, you engage in the actual fraud of deceit because you have actual knowledge of your resignation, but you still willfully misrepresented your position. This damages Republicans Overseas.

As a result, Republicans Overseas demands that you immediately cease and desist from any communication to any third party that you are the current Vice President of Republicans Overseas and correct any misunderstanding regarding your title.

We hope that this letter prompts you to cease the conduct described in this letter.

Sincerely,

The Bopp Law Firm, PC



James Bopp, Jr.
Corrine L. Purvis