

# Fulbright & Jaworski I.I.p.

A Registered Limited Liability Partnership 801 Pennsylvania Avenue, N.W.

**VIA FEDERAL EXPRESS, FACSIMILE (440.744.2250), AND E-MAIL  
([info@peebs.net](mailto:info@peebs.net))**

[Addressee Information removed]

## **NOT FOR PUBLICATION**

Re: <http://www.peebs.net>

Dear [Removed]

This firm represents the Brethren (the “Brethren”), known as the Exclusive Brethren or Plymouth Brethren. We write this letter in connection with certain false and defamatory statements regarding our client published on the world wide web at your site, [www.peebs.net](http://www.peebs.net). Set forth below are specific defamatory statements we have identified, as well as a short description for why each statement is false.

1. On February 25, 2005, the [www.peebs.net](http://www.peebs.net) “News Page” published the following regarding a complaint filed with the New Zealand Broadcasting Standards Authority (“NZBSA”) concerning a July 13, 2004 broadcast by Michael Laws:

*During a recent radio show, Michael Laws suggested that the Exclusive Brethren were “... mad, ignorant, bad neighbors ... probable child abusers, who should be bred out of the human race.” Other terms relating to the Exclusive Brethren used during the show were: “nutter sect”, “potty”, “dangerous little buggers” and “strange and weird beasties”.*

*It is worth noting that the Exclusive brethren have used far worse terms in their fellowship meetings, for example in the Aberdeen 1970 transcripts and voice recordings available on this site.*

In publishing this excerpt, [www.peebs.net](http://www.peebs.net) has repeated the defamatory and false statement made by Michael Laws. In turn, we understand these remarks were based on material that Mr. Laws first obtained from [www.peebs.net](http://www.peebs.net). We also understand that NZBSA upheld the complaint against Mr. Laws and Radio Pacific, finding that the “broadcast had the effect of encouraging denigration by

blackening the reputation of members of the Exclusive Brethren.” The NZBSA further noted: “His commentary amounted to a sustained attack on the Exclusive Brethren. Particularly concerning were the repeated and unsubstantiated allegations, including that the Exclusive Brethren were child abusers.” By reprinting these false and “blackening” remarks, [www.peebs.net](http://www.peebs.net) has violated the NZBSA order and caused further damage to the Brethren and its members.

2. On Tuesday, October 19, 2004, we understand that [www.peebs.net](http://www.peebs.net) posted the following in its private forum:

[Private Conversation removed]

This entire excerpt portrays Mr. [removed] individually, and the Brethren as a whole, in a false and defamatory light. For example, the statements that “[removed] is at home and tranquilized,” the numerous statements that Mr. [removed] facilitates the illegal distribution of prescription drugs to members of the Brethren, and the statements that Mr. [removed] has fathered an “illegitimate child” and/or has refused paternity testing are false and defamatory.

In addition to the specific defamatory statements identified above, there are numerous statements and allegations on the site that falsely claim that the Brethren are “abusive” to their members, their members’ families, or to others. For example, on the home page the following heading exists: “Spiritual and Emotional Abuse...*Spiritual Abuse* is an emotive term, but on this site you will find many who will testify to its reality. An anonymous contribution looks at how Abuse related to the experience of those who are or have been associated with the Exclusive Brethren.” These statements have caused, and are continuing to cause, damage to the Brethren, both collectively and individually. The remedy is for [www.peebs.net](http://www.peebs.net) to remove all such statements from the site immediately.

Further, the website gives the false impression that it is approved or sponsored by the Brethren. For example, the home page contains the following false and misleading statements “An Exclusive Brethren Site...” and “Who are the Exclusive Brethren?” These statements must be removed. In addition, to avoid any future false impressions, the web site must post a prominent disclaimer stating that it is not approved or sponsored by the Exclusive Brethren.

There can be no doubt that the above-referenced allegations are grossly defamatory of the Brethren and have caused substantial damage to the reputation of the Brethren as a whole as well as to the reputations and interests of individual members of the Brethren. However, given that the immediate removal of the aforementioned allegations from circulation and a correction and apology is more important to the Brethren than money, the Brethren are prepared to accept the following undertakings in full and final settlement of their complaint, provided that matters can be resolved without the Brethren having to institute formal legal proceedings.

1. The removal of the defamatory statements from [www.peebs.net](http://www.peebs.net), as well as any

other defamatory statements that the Brethren identify.

2. The immediate cessation of publication of any further defamatory statements regarding the Brethren.

3. The publication of a retraction and apology stating the following:

*Peebs.net regrets publishing, or causing to be published, untrue, defamatory, and malicious material on the Internet about the Brethren. Peebs.net recognizes that these materials have caused harm and pain to the Brethren as a whole, and individual members of the Brethren. Accordingly, Peebs.net shall no longer participate in such publication in any form whatsoever.*

4. Reimbursement of the legal fees and expenses incurred by the Brethren in connection with this matter.

5. Publication on the website of a prominent disclaimer stating that it is not sponsored or approved by the Brethren.

Absent these undertakings, the Brethren are fully prepared to vigorously pursue all available legal remedies against [www.peebs.net](http://www.peebs.net) and any other responsible entities or individuals. In such a lawsuit, the Brethren would seek the maximum relief allowed under law, including compensatory and punitive damages, injunctive relief, as well as attorneys fees and costs.

**Please respond to this letter by contacting the undersigned within ten (10) business days by fax, e-mail or letter at the address listed above. In the absence of such a response, I will assume that you wish to resolve this matter through formal legal proceedings.**

Very truly yours,

/s/

Matthew H. Kirtland