

July 18, 2016

Via Electronic And Certified U.S. Mail

Stephanie Zvan
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CAMPBELL PERRY LLC

RE: Dr. Richard Carrier -- Defamatory Allegations

Dear Ms. Zvan:

Please be advised that our office has been retained by Dr. Carrier concerning false and defamatory allegations in your recent post on The Orbit. You are hereby ordered to immediately **CEASE AND DESIST** making any further false and/or defamatory statements about Dr. Carrier.

It is unlawful to engage in defamation of another's character and reputation. Defamation consists of broadcast statements, that a speaker either knows to be false or makes with reckless disregard as to truth or falsity, that lower a person's esteem in the community or deter others from associating with him. Injury to reputation is presumed if the defamation concerns statements that a person is guilty of a crime involving moral turpitude, or about a person's business or profession. According to your online statements, you allege very serious charges that include sexual harassment, a 'pattern of pushing a staffer's boundaries,' multiple allegations of 'flatly unacceptable behavior,' and 'problem behavior,' perpetrated upon no fewer than five women, to wit:

Summarizing the Current Allegations Against Richard Carrier

June 20, 2016 | [Stephanie Zvan](#)

Skepticon has [just released a statement](#) saying that Richard Carrier will not be allowed to attend their future conferences because of inappropriate behavior. They had previously stopped inviting him to speak after he displayed a pattern of pushing a staffer's boundaries.

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In case you missed it last week, this is the third allegation of flatly unacceptable behavior from Carrier to be made public. The first he publicized himself.

As of last week, we also have this public accusation of him violating the policy with another student. She says he hit on her and nonconsensually touched her arm and leg. There are comments from another student corroborating that these aren't new accusations. This is the accusation that the Secular Student Alliance investigated and which resulted in his removal from the SSA Speakers Bureau.

I've spoken to a Skepticon organizer. The pattern there is similar, except that the expressions of sexual interest were repeated, though more deniably after they weren't reciprocated. I've also spoken with two other people who don't wish to come forward publicly. Both have been on the receiving end of Carrier's unwanted interest. In both cases, he met their polite deferral of his interest with more blunt expressions of interest. There are also very troubling aspects of how Carrier spoke of these people to others. I won't go into that in detail because it has the potential to identify them.

Whether I'm looking at all five of these accusations or only the three public ones, my reaction is the same. The most charitable thing I can find to say about Carrier's behavior is that he is oblivious to sexual disinterest in him and unwilling to stop initiating sexual contact despite that. I'm not inclined to that kind of charity in the face of that much problem behavior, however. I'm even less inclined to charity for someone who repeatedly breaks rules designed to protect students to behave that way. Less so yet for someone who tells us that *in a post defending himself*.

Your statements, published on The Orbit, accused Dr. Carrier of a crime involving moral turpitude and lowered his professional reputation. Dr. Carrier vigorously disputes the entirety of these allegations. Your statements appear to be, in part, derivative of the claims alleged by Ms. Amy Frank, of the ASU Secular Student Alliance. Ms. Frank's allegations of sexual assault and harassment are false, and contradicted by multiple eyewitnesses, and an independent professional investigation did not conclude assault or harassment occurred.

Claims of this nature require facts, supported by evidence. You have not presented any evidence to support your allegations. Your claims rely solely upon rehashing conclusory or speculative assertions without basis in reality or fact. Moreover, you bear a responsibility, before circulating unverified rumors and innuendo, to make a good faith effort to investigate and substantiate their veracity. As you've made no such effort, your statements are defamatory, intentionally reckless and malicious.

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You claim, in your article, to have spoken with a Scepticon organizer, and two other people who don't wish to come forward publicly. This is scarcely an adequate foundation to support such contemptible accusations. In fact, you have no evidence to support these claims.

Accordingly, we demand that you:

- (1) Immediately cease and desist your unlawful defamation of Dr. Carrier, and
- (2) Within ten days of the date of this correspondence provide us written assurances that you will cease and desist from further defamation of Dr. Carrier's character and reputation, and show proof of all published retractions as specified below, and

- (3) Publish a full written retraction, on The Orbit and every other public forum wherein your defamatory statements were made, including, but not limited to, corrections that:
 - a. Your statements were false as well as misleading, and that
 - b. Ms. Amy Frank's accusation has been contradicted by eyewitnesses, and an independent professional investigation did not conclude assault or harassment had occurred, and that
 - c. Apart from Ms. Amy Frank's discredited accusation, Dr. Carrier's behavior at conferences and events, including at Scepticon, has never been the subject of any formal complaint by anyone attending or staffing them, for the entirety of his speaking career of more than ten years, and that
 - d. Not one of the complaints you cited took place at an event or conference, and that
 - e. At no time did Dr. Carrier continue behavior he was told was unwanted, and that
 - f. The unnamed sources you cited rely on nothing more than a single electronic message, in each case within the context of a longstanding friendship between them and Dr. Carrier, and that
 - g. Notwithstanding knowledge of a pending investigation, you recklessly circulated unverified accusations without regard as to truth or falsity.

(4) Further, we demand that you reimburse Dr. Carrier's reasonable attorney's fees and costs relative to the above referenced matter.

Once you have had an opportunity to review the contents of this letter, you or your attorney should certainly contact my office to discuss these issues, options, and courses of action. Should we not hear from you or receive your written assurances before the above noted deadline, I will have no choice but to advise my client as to all legal and equitable remedies that he may have available to him in regard to this matter, including, but not limited to, bringing a claim for defamation *per se* with a request for punitive damages.

Please do not attempt to contact Dr. Carrier directly and refer all correspondences instead to my attention. I look forward to working with you in this matter.

Sincere Regards,



Jeffrey T. Perry, Esq.
Campbell Perry, LLC
Supreme Court No.: 0088989

cc: Dr. Richard Carrier
Greta Christina, The Orbit

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