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***Sent Via: overnight carrier***

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General Counsel  
WarnerMedia News & Sports

Atlanta, GA 30303

**RE: Meanwhile in America: The key to California Gov. Gavin Newsom's fate**

To CNN:

We are the attorneys for Kevin Paffrath—also known as Meet Kevin on YouTube. Mr. Paffrath is a poll-leading democratic candidate to replace Governor Gavin Newsom in the California recall election occurring September 14, 2021. The purpose of this letter is to demand that you cease and desist your erroneous reporting which falsely states that “no Democrats are competing against their own party’s governor.”

Your website at CNN.com “Meanwhile in America” page prominently featured an “analysis” by Stephen Collinson on August 23, 2021, which contains the false statement. You even labeled the analysis as “updated at 1:57 p.m. ET.” Yet your reporting failed to correct the false statement you knew, or should have known, was false when written. Your analysis even links to an August 21 CNN.com article stating, “There are nine Democrats listed among the replacement candidates” but Mr. Collinson’s analysis seeks to memory hole that truth.

The fact is, candidate Kevin Paffrath is a moderate, JFK-style Democrat with emergency-action plans to finally do what Governor Newsom hasn’t: end the water crisis, prevent wildfires,

and end the nightly horror of homeless individuals dying in California's streets. Mr. Paffrath intends to solve the causes of homelessness and despair in our golden state. Ranked 40<sup>th</sup> in schools, California now has a mental-health and crime crisis, and Californians are fleeing the state. Mr. Paffrath offers new leadership at a time when it's most needed.

And yet, your website pushes disinformation to California voters looking for serious "analysis" of the recall election. Your editors have already been alerted to this truth gap in your recall reporting. Mr. Paffrath's twitter feed put CNN on blast for its disinformation before, and your failure to correct the record would rise to the level of libel and defamation if based on malicious intent.

Since your company was on notice, you knew or should have known that Mr. Collinson's analysis was false, but your company published it anyway. This demonstrates reckless disregard for the truth—either a lack of fact-checking, or printing the false story in spite of knowing the facts. Not a good look for CNN, but worse is the effect on the outcome of the election.

Kevin Paffrath is certainly as prominent in the social media space as Republican recall candidate Larry Elder is in the AM-talk-radio space. 1.69 million YouTube subscribers know what Mr. Paffrath stands for. CNN must immediately correct the record for the 22 million registered voters in California's election, so Mr. Paffrath's qualifications are accurately stated in time to matter.

Very Truly Yours,

SCHNEIDERS & ASSOCIATES LLP



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