

Confidential Attorney-Client Communication



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the District of Columbia

June 3, 2021

VIA EMAIL (gf_lane@yahoo.com) FedEx Overnight Delivery

Gregory Fitzgerald Lane
6625 N. Glenwood Ave, Apt 1
Chicago, Illinois 60626

Re: ConservativeHQ.com, Inc., and George Rasley v. Gregory Fitzgerald Lane

Dear Mr. Lane:

This firm represents ConservativeHQ.com, Inc., (“CHQ”) and George Rasley in connection with enforcement of legal duties you owe to CHQ and Mr. Rasley. If you are represented by counsel, please forward this letter to your counsel.

I understand that you have perpetrated a campaign of cyberstalking against CHQ and Mr. Rasley beginning in May 2021 when you caused to be published on ConservativeHQ.com a post containing anti-Semitic content. CHQ deleted your anti-Semitic post. You subsequently posted a stream of name-calling and invective which prompted CHQ to block you from posting further on ConservativeHQ.com using your email address, gf_lane@yahoo.com. You were informed that you were banned from posting, and you responded by using a different username and posting, “you can’t stop me.” You returned to ConservativeHQ.com and, using other usernames, again posted insulting, harassing, and threatening material that targeted legitimate users of the site and members of CHQ’s staff. During the period beginning May 2, 2021, and ending July 21, 2021, and in response to CHQ’s actions to block your use of its site, you successively created and used new usernames to enable you to continue posting on the site. Specifically, to get around being blocked and to rage against CHQ’s enforcement of its community standards and deletion of your posts, you created and used the following usernames:

gf_lane@yahoo.com
mr.glane@gmail.com
ceehqued@gmail.com
45suxass@gmail.com
stormysfuqtoy@gmail.com
georgesorosisgod@yahoo.com
allhailjewlaser@gmail.com
jesusdeathray@yahoo.com

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enjoyingyourpain@gmail.com
conservativehatesyou@gmail.com
sorostimesten@gmail.com
mr.trumpkillah@gmail.com
trumpkillah@gmail.com
sonofsoros@gmail.com
trumpsladyhumps@gmail.com
trumpshumps@yahoo.com
trumpsstumps@yahoo.com
lindseysladybugs@gmail.com
lindseysladybugs@yahoo.com
idiotdecimator@gmail.com
gopmonstermasher@yahoo.com
sometruthfortheolds@yahoo.com
gregory.lane@globalservs.com

You returned to ConservativeHQ.com almost daily, at one point using as many as 17 different usernames in a 24-hour period, to insult other, legitimate users of the site and to harass and threaten members of the CHQ staff. You used usernames themselves as a means of harassment, including, for example, TrumpKillah, Mr.TrumpKillah, ScourgeofGeorge, AllHailJewLaser, and AskHeather, which referred to the daughter of a CHQ staff member. Your posts included messages targeting George Rasley, a writer with CHQ, posting “George Rasley is a faggot” and “George Rasley is a coward and a big, gaping pussy.” You also made unspecified threats:

But you should understand - and please send this threat to your sheriff - I am the water that wears through stone and I will grind you into dust I gave you the opportunity to bury the hatchet by deleting the article you wrote misrepresenting me. You did not, so unless an actual officer of the law reaches out to me, I’m calling you out on your b.s.

You targeted Mr. Rasley specifically, posting:

Whereas, I haven’t even started messing with you yet. By the way, your tiny house in [city and state of Mr. Rasley’s home], suggests maybe you got into the wrong business.

Florida Statute § 784.0485 provides a cause of action for an injunction for protection against stalking, including cyberstalking. Under the statute, “cyberstalk” means “[t]o engage in a course of conduct to communicate, or to cause to be communicated, words, images, or language by or through the use of electronic mail or electronic communication, directed at a specific person . . . causing substantial emotional distress to that person and serving no legitimate purpose.” A person who suffers an injury or loss as a result of a violation of an injunction for protection against stalking or cyberstalking may be awarded economic damages for that injury or loss by the court issuing the injunction. Fla. Stat. Ann. § 784.0487(5). Damages include costs and attorney fees for

enforcement of the injunction. Id. Illinois and Virginia law may provide other remedies which may be available to CHQ and/or Mr. Rasley. Federal law likewise may provide a cause of action to CHQ and/or Mr. Rasley.

The conduct you have directed at Mr. Rasley and CHQ is cyberstalking and harassment. Please cease and desist cyberstalking and harassing CHQ and Mr. Rasley. Please cease and desist from any communications regarding CHQ, Mr. Rasley, or any other individuals associated with CHQ or Mr. Rasley. You are not authorized to use ConservativeHQ.com for any purpose, and please cease and desist from doing so, including but not limited to posting any content on the site. You are also hereby prohibited from going upon or remaining upon the lands, buildings or premises, or any portion or area thereof, of George Rasley, CHQ, and Praemia Law, PLLC. If you fail to comply with your legal duties to CHQ and/or Mr. Rasley, one or both of them may take appropriate legal action to enforce their rights and obtain protection from you. Please govern yourself accordingly.

In light of the possibility of litigation, please take the steps necessary to preserve any and all documents and electronically stored information in your possession or control, that may reflect, reference, or otherwise relate to CHQ or Mr. Rasley and the facts in this matter. Please understand that “electronically stored information” should be afforded the broadest possible definition and includes, by way of illustration and not limitation, the following:

- Any and all of iterations of documents or information possessed or controlled by you and relating to CHQ or Mr. Rasley;
- Digital communications (e.g., electronic mail, instant/text messages, posts);
- Voice mail messages;
- Video and audio recordings;
- Databases, including but not limited to lists;
- Online Access Data (e.g., Temporary Internet Files, History, Cookies); and
- Network Access and Server Activity Logs.

Please comply with your legal duty to preserve all of the relevant information and evidence that refers to or relates to CHQ or Mr. Rasley in any way whatsoever. Please keep in mind that relevant documents and communications may be stored in voicemail; in email accounts; on home or office computers; on smartphones (including text messages) or tablets, or other similar devices; in paper file; and on flash drives and similar storage devices.

Sincerely,

Timothy M. McConville