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October 15, 2020

Via Email

Robert Garrity Jr.
615 Hickory Ave
Harahan LA, 70123

RE: Christopher Bruno v. Jennifer Medley et al
CDC No. 2020-7905, Div. J
Our File No: 20-0151

Dear Mr. Garrity,

Please find enclosed herewith a copy of the decision of the Louisiana Judicial Campaign Oversight Committee dated October 14, 2020 relative to your clients, Jennifer Medley and Jennifer M. Medley Campaign Fund and the video advertisement described in the complaint pertaining to the matter of *Doe v. Lewis*, No. 2014-7067, Civil District Court for the Parish of Orleans.

As you know, your clients have been running this advertisement on Facebook, and television, and possibly through other media, which states:

I was raped 7 years ago, and finally after 7 years I got my day in court. Or so I thought. I had the misfortune of appearing before Judge Christopher Bruno and from the start, I could feel his bias against me. He called me a scorned woman and didn't find me credible. Being raped is something no woman should have to endure and Judge Christopher Bruno's treatment of me was just as bad.

The Judicial Campaign Oversight Committee investigated this ad and found it to be false. Specifically, it found as follows:

- There was "no evidence that Judge Bruno was biased."
- "Judge Bruno never called the Plaintiff a scorned woman."

- That Judge Bruno weighed all of the evidence in the trial of this matter and issued a ten-page reason for Judgment;

The Committee stated it believes **“the video created by the Medley Campaign contains false and misleading statements regarding Judge Bruno in connection with *Doe v. Lewis*, No. 2014-7067 (Civil District Court for the Parish of Orleans), in violation of Canon 7A(9).**

Further, after reviewing the ten-page Judgment in this matter, any reasonable attorney or person would conclude that the ad was false. Specifically, the Plaintiff in the case that is depicted on your ad was found to be incredible, as indicated by the Judicial Campaign Oversight Committee, when she accused the defendant in that matter of rape. Multiple witnesses that were present during the alleged rape testified at the trial that they heard only consensual sex occurring. Further, the Plaintiff admitted under oath that she had accused another man of raping her to get back at him. For many of these reasons, criminal charges were refused by local authorities and so the Plaintiff attempted to sue the defendant for money damages. Significantly, after a trial on the merits the Court awarded no money to the Plaintiff and awarded the accused Defendant with tens of thousands of dollars in compensatory damages for defamation, finding that the Plaintiff maliciously falsely accused him.

Especially with this contextual background, it is clear that the decision of the Committee that the video created by the Medley Campaign contains false and misleading statements regarding Judge Bruno would be echoed by Judge Pitcher and that, similarly, the Court would find that your clients knew the ad was false.

Your clients have already been found by Judge Pitcher to have run a false ad when he granted our preliminary injunction on September 30 and remarked on the record that she violated Canon 7A(9) in doing so. Now, the Judicial Campaign Oversight Committee has concluded your clients are again running another false ad.

My client would like to avoid unnecessary litigation attendant to this election and allow the public to focus on facts, experience, and integrity. With this opinion from the Judicial Campaign Oversight Committee, we could easily obtain a Temporary Restraining Order. However, we would like to give your clients the opportunity to follow the Judicial Canons and to voluntarily cease and desist from running this false commercial and to remove all links, posts, and references to same. Please advise by Friday, October 16, 2020 at close of business if you are agreeable to this proposal. Otherwise, we will have no choice but to seek all available legal recourse.

If you have any questions concerning the above, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'MEGAN C. KIEFER', with a stylized flourish extending from the end.

MEGAN C. KIEFER