

September 30, 2024

VIA EMAIL ONLY

([REDACTED] @gmail.com)

Madison

124 W Broadway
Monona, WI 53716
p: 608.258.9588
f: 608.258.9105

Milwaukee

735 W Wisconsin Ave
12th Floor
Milwaukee, WI 53233
p: 414.326.3260
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Chicago

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Ker [REDACTED]

Re: Demand to Cease and Desist

Dear Mr. [REDACTED],

As you are aware, I represent Steve Telkamp. I am writing to demand that you immediately cease and desist from taking further harassing and unlawful action toward my client, including but not limited to, communicating false and defamatory statements about him to third parties, and communicating false and defamatory statements on your social media platforms about Mr. Telkamp. I further demand that you immediately remove all videos concerning or relating to Mr. Telkamp from all of your social media accounts, including but not limited to, Instagram, YouTube, and TikTok.

Obviously, no one should engage in or support grooming. It is a serious matter and a serious concern of parents but because it is so serious it is important for all the families involved to get the facts right. I understand that you were upset by the lack of communication with MASD regarding your complaint against my client. While I can appreciate protecting ones' children, and my client certainly does not fault you for filing a complaint with the District about what you believed to be inappropriate actions, that does not give you the right to defame my client in public or interfere with his new job.

Attorneys at Law

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The fact is Mr. Telkamp has never groomed any students, including your daughter or any other student at any school he has taught at. As you are aware, Mr. Telkamp has never received any discipline during his career as a teacher. In addition, Mr. Telkamp was not under investigation for grooming students at MASD. And Mr. Telkamp did not resign because of the investigation brought on by your complaint. He resigned because he did not think the District handled your complaint properly. Importantly, this was the first time anyone had filed a complaint against him, and he felt terrible that any student of his was uncomfortable in his classroom. Moreover, he immediately stopped engaging in the behaviors your daughter complained of once he was made aware of the complaint. Although you have publicly attributed this entire situation to your belief that Mr. Telkamp is a pedophile and groomed your daughter, groomed other teenage girls, and resigned because he was being investigated for grooming, you also publicly stated in one of your videos that you had no idea why Mr. Telkamp resigned. Furthermore, even after you were informed by the MASD that my client did not engage in any immoral conduct, you posted multiple defamatory videos on social media platforms, tortiously interfered in my client's contract with KUSD, and admitted in public, in writing, that your goal is to ensure that my client never teaches again.

In Wisconsin, the elements of defamation are: (1) a false statement, (2) communicated by speech, conduct, or in writing to a party other than the party defamed, and (3) the communication is not privileged and tends to harm one's reputation so as to lower them in the estimation of the community or to deter third persons from associating or dealing with them. *See Torgerson v. Journal/Sentinel, Inc.*, 210 Wis. 2d 524, 534, 563 N.W.2d 472, 481 (1997). Certain statements you have made regarding my client meet these requirements, and due to the flagrant and inflammatory nature of their content, may bring punitive liability. *See Dalton v. Meister*, 52 Wis. 2d 173, 180-81, 188 N.W.2d 494 (1971). Again, the statements you have publicly made are false and have been viewed on your social media account by thousands of people, and it is indisputable that calling a teacher a groomer, which by implication means he is a pedophile, is the most destructive allegation someone can make against a teacher.

In addition, under Wisconsin law, a successful tortious interference with a contract claim requires my client to prove that: (1) he had a contractual relationship with a third party (2) you interfered with that relationship (3) your interference was intentional (4) there was a causal connection between the interference and damages, and (5) you were not justified or privileged to interfere. *See Briesmeister v. Lehner*, 295 Wis. 2d 429, 720 N.W.2d 531 (Wis. Ct. App. 2006).

Your actions have damaged my client's reputation and his career. As the comments in your videos demonstrate, the public has accepted the defamatory statements as true. Clearly, your goal is to destroy the reputation and career of Mr. Telkamp because you have stated as much. And you have acted on that goal by interfering with Mr. Telkamp's contractual relationship with KUSD.

Ken [REDACTED]
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We demand that you take the following immediate actions: (i) remove all your videos, postings, etc. on all of your social media accounts (e.g., TikTok, Instagram, YouTube, Facebook) concerning or relating to my client; (ii) cease and desist from making further defamatory statements regarding my client to any third-party; and (iii) contact KUSD through the same means in which you contacted them previously and apologize for getting involved in my client's contractual relationship and inform KUSD that you are retracting your allegations.

Should you fail to take the steps outlined in the paragraph above within 48 hours of receipt of this letter or continue to utter defamatory statements to third parties about my client, I will file an injunction with the court against you and seek all statutory costs and attorney fees accompanying said filing. Furthermore, my client has instructed me to file a civil lawsuit against you for defamation and tortious interference with a contract and to seek punitive damages. However, if do take the steps outlined above within 48 hours and cease from making continued defamatory statements, my client will consider this matter closed and take no legal action against you.

Please direct all further communications regarding this matter to my attention. I can be reached at the ckloth@foxquick.com or on my direct line at 612-804-0871.

Sincerely,

FOX & FOX, S.C.



Christopher Kloth

CK/klb

September 30, 2024

VIA EMAIL ONLY
(kenoshacountyeye@gmail.com)

Kevin Mathewson, Editor
Kenosha County Eye
620 56th Street
Kenosha, WI 53140

Re: Article Retraction

Dear Mr. Mathewson,

I am reaching out to you because I represent Steve Telkamp. On September 5, 2024, your online news publication, Kenosha County Eye, published an article about Mr. Telkamp, titled "KUSD Places Bradford Teacher On Leave In Response to Allegations Of Grooming At Previous District." In the article are two embedded YouTube videos from Kenschonsin, which were created by Ken [REDACTED]

Although my client and I do not take issue with what you wrote in the article, with the exception of the title of the article, the statements made by Mr. [REDACTED] in the videos, including the transcription of his statements in the article, are objectively false and defamatory. Mr. Telkamp has never groomed any students, including Mr. [REDACTED]'s daughter or any other student at any school he has taught at. Mr. Telkamp was not under investigation for grooming students at his prior school. Mr. Telkamp did not resign because of the investigation brought on by Mr. [REDACTED]'s complaint. In fact, in one video Mr. [REDACTED] admits that he has no idea why my client resigned yet in another video he alleges that my client resigned because he was being investigated for grooming teenage girls. Even after Mr. [REDACTED] was informed by the school district that my client did not engage in any immoral conduct, Mr. [REDACTED] posted multiple defamatory videos on social media platforms, tortiously interfered in my client's contract with KUSD, and admitted in public, in writing, that his goal is to ensure that my client never teaches again.

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Kevin Mathewson, Editor
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Obviously, no one should engage in or support grooming. It is a serious matter and a serious concern of parents but because it is so serious it is important for all the families involved to get the facts right. When I reached out to Mr. [REDACTED] recently to respectfully discuss this situation and provide him with additional information regarding my client that he appears to have gotten wrong and to discuss the information he believes substantiates his allegations, he flatly refused to have a conversation with me. A reasonable conclusion to draw from his response is that he is making incendiary claims with the hope of boosting his social media presence. I assume you were aware that Mr. [REDACTED] is a social media influencer that draws income from product reviews and product placement before you published his videos.

I am also wondering what efforts the Kenosha Eye made to investigate the defamatory statements in Mr. [REDACTED]'s videos before publishing them in the article. Frankly, I can think of nothing more destructive to a teacher's career than to be accused of being a pedophile that grooms teenage girls. Given that you have been involved in quite a bit of litigation, I am sure you understand the law on defamation when it concerns a private person.

I applaud you generally for starting your news website, but the power of your site is built by publishing accurate information. Mr. [REDACTED]'s videos in your article are patently false and defamatory. Your article, along with Mr. [REDACTED]'s actions, have damaged my client's reputation and his career. As the comments in your article demonstrate, the public has accepted the defamatory statements as true. Clearly, Mr. [REDACTED]'s goal is to destroy the reputation and career of Mr. Telkamp because he has publicly stated as much. I would hope it is also not your intention to destroy the reputation and career of a good teacher. Regardless of your intentions, however, and in accordance with Wisconsin Statute § 895.05, we demand that a retraction be issued and the offending videos and transcription be removed as required under the aforementioned statute.

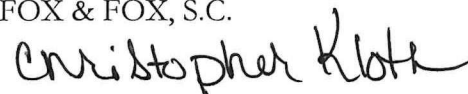
Although I sincerely hope you do the right thing and comply with your obligations under the law, this letter also serves as notice that you are required to preserve all evidence that references, relates to, or regards this matter.

Should you have any questions or concerns, I can be reached at ckloth@foxquick.com or on my cell phone at 612-804-0871.

I appreciate your prompt response to our demand.

Sincerely,

FOX & FOX, S.C.



Christopher Kloth

CK/klb