

SHEATS & BAILEY, PLLC

Serving the Construction Industry

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January 23, 2020

Via Electronic Mail:
jim@genevabeliever.com

Jim Meaney
Founder and Editor
Geneva Believer

Re: Libelous Publication Attacking Massa Construction, Inc. and Nicholas P. Massa

Dear Mr. Meaney:

This firm represents Massa Construction, Inc. and Nicholas P. Massa ("Massa").

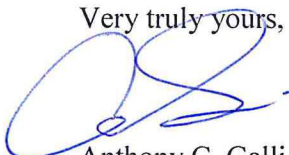
Massa hereby demands that the Geneva Believer immediately remove its defamatory publications concerning Massa Construction, and to cease and desist from any further publication of the same. Massa further demands that written confirmation be sent to Massa within twenty-four (24) hours that it has done so. I have enclosed copies of the publications so as to avoid any confusion as to which publication I am referring to; the most recent being a publication from January 12, 2020.

Your articles are reprehensible attacks on both Massa's business reputation and personal reputation. The publications contain various false statements about Massa that tend to denigrate Massa's basic business integrity. Your various false claims of collusion and unfair dealing between Massa and the City of Geneva are false. Moreover, your articles are clearly intended to denigrate Massa's Italian-American heritage, and such conduct is inexcusable.

In the event that the Geneva Believer fails to remove its defamatory publications concerning Massa Construction, and cease and desist from any further publication of the same within twenty-four (24) hours, Massa will seek injunctive relief and damages.

Be guided accordingly.

Very truly yours,



Anthony C. Galli