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September 29, 2022

VIA ELECTRONIC MAIL
THEDAYMEN@GMAIL.COM

Damien Newton
Santa Monica Next
11539 National Boulevard
Los Angeles, CA 90064

Re: September 27, 2022 Article in Santa Monica Next

Dear Mr. Newton:

We represent Global-Dining, Inc of California the owner/operator of 1212 Santa Monica Restaurant (“1212”) in Santa Monica. We write regarding the false, defamatory statements you published Tuesday, September 27, 2022, in a blog post entitled “Complaint Filed Against CM Lana Negrete in Possible Bribery Scheme.”

First, your claim that 1212 is operating without a license is demonstrably false. As you surely are aware—or could learn with even minimal research—Santa Monica’s fiscal year runs from July 1 to June 30 each year, the time to renew existing business licenses begins on July 1, and licensees have 60-days to apply for renewal (<https://finance.smgov.net/doing-business/business-license/renewals>). 1212 timely applied for renewal and the renewal fee was received by the City.

Second, your assertion that Mr. Tudor “conspired” with Ms. Negrete “to bribe members of the Santa Monica Police Department in the days after” a July 2/July 3 incident is also flatly untrue. The gift cards in questions were issued and provided *prior to* July 1 and had no relation whatsoever to any investigation related to events occurring July 2-3. As you know—your post includes a reference to a California Penal Code section—bribery is a criminal offense and requires a quid pro quo. No evidence of any quid pro quo exists here, because simply put there was no quid pro quo. False statements accusing one of committing a crime are libel per se under California law, so the only issue in litigation of your defamatory statements would be the appropriate amount of damages.

quinn emanuel urquhart & sullivan, llp

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We hereby demand that you promptly remove your story or, at a minimum, retract all defamatory statements. This letter is not a complete statement of the facts relevant to or the law governing this matter. 1212 is reserving all rights, claims, and remedies in connection with this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'SGM', written in a cursive style.

Steven G. Madison