

JOAN M. ANDREWS

Attorney

Direct Dial: 801-323-2263

Facsimile: 801-596-2814

jandrews@fabianvancott.com

November 18, 2021

VIA EMAIL and U.S. MAIL

Community Wireless of Park City Inc., dba KPCW
Attn: Renai Bodley Miller
460 Swede Alley
Park City, UT 84060

Re: Board of Education of Park City School District

Dear Ms. Miller:

I write to you in your capacity as general manager of, and registered agent for, Community Wireless of Park City Inc., dba KPCW. This firm represents the Board of Education of Park City School District, who has brought to our attention certain issues of concern regarding KPCW's recent reporting on matters involving the Board and District.

Specifically, on November 17, 2021, you published in various media, including on your website and Facebook pages, the following statement: "During Tuesday's Park City school board meeting, board member Andrew Caplan said Parley's Park Elementary School did not violate the county mask order and called reports of violation fake news."

This statement is demonstrably false and on behalf of the Board of Education we demand the immediate retraction of same. More specifically, at no time was the term "fake news" used by Mr. Caplan. The use of this term appears deliberately calculated to create the belief in the community that Mr. Caplan is opposed to Summit County Public Health Order mask mandate, which he is not, nor is the Board as a whole. We demand that your published statements regarding the Board's meeting of November 16, 2021, be immediately revised to remove any and all references to "fake news" and to otherwise provide only truthful and accurate quotations from Board members. Your failure to do so within three days of your receipt of this demand will be deemed a refusal and the Board will consider its future relationship with KPCW accordingly.

In the meantime, the Board has asked me to convey that Board members and District administrators will not be engaging with KPCW with respect to its repeated queries for comment, appearances, or other interactions, at least until we have clarity around the outcome

ATTORNEYS AT LAW

215 South State Street, Suite 1200
Salt Lake City, UT 84111-2323
Tel: 801.531.8900 Fax: 801.596.2814
www.fabianvancott.com

of the review of what happened during week one of the Parley's Park Elementary School mandate. The Board and District will continue to communicate on matters of importance to their constituents through other channels. Thank you in advance for your anticipated cooperation and understanding.

FABIAN VANCOTT

A handwritten signature in blue ink that reads "Joan M. Andrews". The signature is written in a cursive style with a light blue background behind it.

By: Joan M. Andrews

c: Leslie Thatcher (via email)
Michelle Deininger (via email)
Board of Education (via email)
Supt. Gildea (via email)