



THOMAS A. CLARE, P.C.

C L A R E L O C K E  
L L P

MEGAN L. MEIER

February 2, 2021

*Via Email and Federal Express*

Benjamin Turner

Email: [REDACTED]

*Re: Notice of Obligation to Preserve Documents Related to Dominion*

Dear Mr. Turner:

Our firm is defamation counsel to US Dominion Inc.<sup>1</sup>

We write to you because of your role in the ongoing misinformation campaigns falsely accusing Dominion of somehow rigging or otherwise improperly influencing the outcome of the November 2020 U.S. presidential election.

With this letter, Dominion formally demands that you retract your false accusations about Dominion and issue a public apology. Dominion is determined to set the record straight and to defend its good name. It has already filed suits against Sidney Powell and Rudy Giuliani. More will follow. *We are enclosing copy of Dominion's complaints against Powell and Giuliani (and the voluminous exhibits supporting those complaints) so that there is absolutely no doubt in the future that you are fully aware of the facts and that you know your accusations about Dominion are false.*<sup>2</sup>

In addition, in light of the pending and forthcoming litigation about these matters, you must preserve and retain all documents, data, and electronically stored information relating in any way to Dominion or the disinformation campaign about it. You must preserve these items regardless of the medium, format, or device on which they are stored or hosted, and regardless of whether they appear in documents, drafts, notes, calendar entries, emails, text messages, voicemails, social media

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<sup>1</sup> We also represent and write on behalf of its subsidiaries, Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation (collectively, "Dominion").

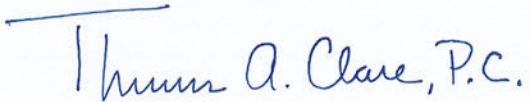
<sup>2</sup> Dominion's complaints against Sidney Powell and Rudy Giuliani are available here <https://beta.documentcloud.org/documents/20445944-dominion-voting-systems-v-sidney-powell> and here <https://beta.documentcloud.org/documents/20463211-govuscourtsdcd22648510> 1.



posts, or in any other form. Failure to preserve these documents could subject you to significant penalties. This letter is not a full recitation of Dominion's rights, which it expressly reserves.

Conduct yourself accordingly.

Regards,

Handwritten signature of Thomas A. Clare, P.C.

Thomas. A. Clare, P.C.

Handwritten signature of Megan L. Meier.

Megan L. Meier