

# KING & MCNAMEE, LLC

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August 17, 2021

**VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED,  
REGULAR U.S. MAIL AND  
EMAIL**

Brad Hildebrand  
P.O. Box 1111  
Washington, MO 63090  
[brad@kslq.co](mailto:brad@kslq.co)

Mr. Hildebrand:

The undersigned and this firm represent Tracy Ellis (“Ms. Ellis”) and Ellis Broadcasting & Media, LLC d/b/a Real Talk Radio.

It has been brought to our attention that on August 16, 2021, you posted on your website [www.radiopoop.com](http://www.radiopoop.com), a quote attributable to Ms. Ellis contained in what appears to be a satire about the conversion of local radio station Majic 104.9 to a gambling talk format, to wit:

“Hell no!”, Tracy said. “God will eliminate that heathen gambling talk and smite their tower with a mighty thunderbolt and knock them off the air. And when the election is overturned President Trump will take away their license.”


As Ms. Ellis disputes having made such a statement to you, it is presumed to be fictional. Notwithstanding the presumed satirical context of the foregoing, your attribution of the fictional statement to Ms. Ellis is disparaging and otherwise inappropriate and potentially libelous and defamatory.

Demand is made that you immediately remove the fictional statement attributed to Ms. Ellis from the website and cease and desist from using any fictional statements attributable to Ms. Ellis on the website in the future. If you do not immediately remove the fictional statement attributed to Ms. Ellis from the website, Ms. Ellis may take further action to protect her interests, including but not limited to filing a lawsuit seeking damages, injunctive relief, courts costs and attorneys’ fees.

Thank you for your attention to and anticipated cooperation in this matter. Should you have any questions, please contact me directly.

Sincerely,

**KING & McNAMEE, LLC**

By:   
Daniel J. McNamee

cc: Tracy Ellis