

August 17, 2018

VIA E-MAIL Rep.Taylor@legis.wi.gov; Lisa@PRWatch.org and FIRST CLASS MAIL

Rep. Chris Taylor
76th Assembly District
306-West
P.O. Box 8953
Madison, Wisconsin 53708

Lisa Graves, Executive Director
Center for Media and Democracy
P.O. Box 259010
Madison, Wisconsin 53715-9010

Re: Defamatory statements regarding David Horowitz

Dear Rep. Taylor and Ms. Graves:

This firm represents David Horowitz and the David Horowitz Freedom Center, a 501(c)(3) nonprofit corporation, regarding the defamatory claims about David Horowitz that you caused to be published on your PR Watch website, on August 13, 2018, in an article written by Rep. Taylor entitled "ALEC in Disarray." Without critical examination, Rep. Taylor's article refers to and blindly adopts the Southern Poverty Law Center's ("SPLC") defamatory labeling of Mr. Horowitz as a "dangerous hatemonger" and as "anti-Islamic".

There is not a shred of truth to these false accusations. Although Rep. Taylor uncritically adopts SPLC's accusation that Mr. Horowitz is a "dangerous hatemonger" and "anti-Islamic," David Horowitz personally challenges you to produce one statement of his or of the Freedom Center that is anti-Islamic. Mr. Horowitz has written and published over a million words. There is not a single sentence of his that could qualify as anti-Islamic. Nor are you or the SPLC able to quote any. Rep. Taylor should have fact-checked SPLC's false designation of Mr. Horowitz before publishing her article.

David Horowitz's life work embodies his support for equal rights for people of all creeds, including Muslims. He has in fact organized protests on more than 100 college campuses against the oppression of Muslim women. He has published booklets against the oppression of Muslim women. He has sponsored panels with Muslim speakers against the oppression of Muslim women. There are numerous videos of his campus speeches on the Internet where he can be seen saying that his efforts are not directed against all Muslims, but are conducted on behalf of most Muslims against the hijacking of their religion by totalitarian radicals who are conducting a campaign of hatred against Jews, gays, and other minority groups. Did Rep. Taylor investigate any of these things?

Very few people have done as much as David Horowitz to expose the ongoing oppression of Muslim women, Jews, gays, and other minorities in Middle Eastern countries, which should have been self-evident to you from recent news stories demonstrating mass murder and repression **of Muslims** by ISIS in Syria, Iraq, and Turkey. Mr. Horowitz's research and exposure of the abuse of minority groups at the hands of extremist elements in such countries should be a legitimate part of any dialogue about extremism.

You cite the SPLC as the source of the defamatory claim that Mr. Horowitz is a "dangerous hater" and "anti-Islamic", but you have failed to critically examine that source before republishing this defamation. You have adopted, without adequate investigation, specious third party claims by the SPLC that Mr. Horowitz is "anti-Islamic". If you had thoroughly investigated these claims, you would have discovered that, on October 30, 2016, Tablet Magazine published on the Internet an article exposing the SPLC's recent blacklisting of David Horowitz and other writers and intellectuals. The article, entitled "A New Blacklist From the Southern Poverty Law Center Marks the Demise of a Once-Vital Organization," is written by Lee Smith, a senior editor at the Weekly Standard and a senior fellow at the Hudson Institute. (See attached article.)

Smith's article outlines in detail how the SPLC, which once valiantly fought against violent supremacist groups like the Ku Klux Klan and defended those advocating non-violence, has turned on advocates of non-violence, like Maajid Nawaz, a practicing Muslim who is working within his Muslim community to push back against extremism. Nawaz frequently insists that "Islam is a religion of peace," but because he is critical of those within his own faith who preach violent resolution of conflicts, the SPLC accuses Nawaz of "blasphemy" (a surprising term for an alleged civil rights organization) and targets him and others on SPLC's blacklist as being anti-Muslim extremists. Really? Why are you adopting and republishing such misdirected defamation?

Instead of defending Nawaz's advocacy of non-violence and diversity of thought, the SPLC is "now aggressively defending the kind of violent supremacists it had once sought to prosecute, and attacking types like Nawaz it had once defended against violence." The article explores several reasons for the SPLC's betrayal of its prior mission, suggesting that the blacklist has nothing to do with real anti-Muslim extremism and is simply being used to smear the SPLC's political enemies.

Attached is an article entitled, "D.C. Shooter A Fan of the Southern Poverty Law Center." <https://www.lc.org/newsroom/details/061517-dc-shooter-a-fan-of-the-southern-poverty-law-center-1>. Not only has the SPLC's hate list been connected to at least two incidents of attempted mass murder, the article quotes Mark Potock, of the SPLC, who admitted in an interview: "***Our criteria for a 'hate group,' first of all, have nothing to***

do with criminality, or violence, or any kind of guess we're making about 'this group could be dangerous.' It's strictly ideological." (Emphasis added.)

In another attached article, "A Demagogic Bully: The Southern Poverty Law Center Demonizes Respectable Political Opponents as 'Hate Groups'—And Keeps its Coffers Bulging," Mark Pulliam catalogues the SPLC's biased listings and describes how the SPLC unfairly uses a loose definition to smear ideological opponents having no connection to actual hate groups:

"The SPLC claims that '917 Hate Groups are currently operating in the U.S.,' but offers only vague guidelines for what qualifies: 'groups hav[ing] beliefs or practices that attack or malign an entire class of people, typically for their immutable characteristics.' Despite its insinuations that hate groups are inherently violent, the SPLC casts a much broader net: 'Hate group activities can include criminal acts, marches, rallies, speeches, meetings, leafletting or publishing' (emphasis added). Indeed, some of the SPLC's hate 'groups' are merely websites or publications—even record labels and religious sects.

"This fluid and subjective definition allows the SPLC to lump together—along with the KKK, neo-Nazis, and racist skinheads—such varied groups as religious-liberty advocates Alliance Defending Freedom and Liberty Counsel; pro-family groups such as the World Congress of Families; Frank Gaffney's Center for Security Policy; the David Horowitz Freedom Center and, separately, its Jihad Watch program; Ann Corcoran's Refugee Resettlement Watch; and many immigration-reform groups, including CIS and FAIR." (See <https://www.city-journal.org/html/demagogic-bully-15370.html>.)

Pulliam even cites left-leaning lawyers and journalists who are openly critical of the SPLC's motives and methods: "Atlanta-based civil rights lawyer Stephen B. Bright, president of the Southern Center for Human Rights and longtime lecturer at Yale Law School, declined to accept the [Morris Dees] award in 2007 because he saw Dees as a 'con man and fraud.'" . . . "I've long regarded ***Morris Dees and his Southern Poverty Law Center as collectively one of the greatest frauds in American life,***' wrote the late progressive journalist Alexander Cockburn in 2007." . . . "Even left-leaning Politico has become skeptical; Ben Schreckinger's recent article "Has a Civil Rights Stalwart Lost Its Way?" notes longstanding charges "that the SPLC is overplaying its hand, becoming ***more of a partisan progressive hit operation than a civil rights watchdog.***" (*Ibid.*) (Emphasis added.)

Rep. Taylor's and PR Watch's utter disregard of Mr. Horowitz's long history of work on behalf of persecuted minorities is reckless, and appears to be driven by political malice.

By repeating the SPLC's ideologically-driven blacklisting of Mr. Horowitz and the Freedom Center, Rep. Taylor and the Center for Media and Democracy (as publisher of

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PR Watch) are engaging in the very kind of rhetoric which is contributing to politically-motivated violence, are damaging their own reputations as neutral arbiters of information, and are continuing to republish false, defamatory accusations that exposes the Center for Media and Democracy to substantial legal liability.

David Horowitz hereby demands that Rep. Taylor and PR Watch immediately apologize and retract the defamatory claim that Mr. Horowitz is a "dangerous hater" or is "anti-Islamic" and cease and desist from further republication of these defamatory claims.

Although he would prefer to resolve this matter on an amicable basis, Mr. Horowitz reserves the right to exercise all civil remedies to limit any damage to his reputation resulting from your continuing violation of his rights.

If the Center for Media and Democracy intends to wholesale adopt SPLC's defamations without publishing relevant data and links that disclose material counter-information, it will put Mr. Horowitz in a false light. Moreover, if you disclose SPLC's false labeling of the Freedom Center, but do not disclose SPLC's admission that its "hate group" list is "strictly ideological," this magnifies the damage to Mr. Horowitz.

Further dissemination of such pernicious misinformation on your PR Watch website will also demonstrate a malicious intent and will support the imposition of punitive damages against the Center for Media and Democracy and Rep. Taylor personally.

Sincerely yours,

HOFFMAN LEGAL CORPORATION



Paul A. Hoffman,
Individual Rights Foundation affiliate counsel

Encls. (3)

PAH:sg

cc: Mr. David Horowitz (w/out encls.)
Manuel S. Klausner, Esq. (w/out encls.)