



# David & Wierenga, P.C.

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May 10, 2018

Vicksburg Public Schools  
Attn:  
Keevin O'Neill, Principal

**DEMAND FOR RETRACTION**  
**CEASE AND DESIST**

***Re: Ryan Bomberger – defamatory publication***

Dear Mr. O'Neill:

My law firm is legal counsel for Radiance Foundation and Ryan Bomberger. Mr. Bomberger recently brought to our attention unlawful actions and defamatory statements made by Vicksburg Public Schools (“VPS”) immediately following Mr. Bomberger’s presentation on Tuesday May 1, 2018 at the Vicksburg High School Assembly.

As you know, Mr. Bomberger is the Chief Creative Officer at the Radiance Foundation. Mr. Bomberger shares his compelling story as a keynote speaker to over 60 venues a year. The Pregnancy Helpline Center of Three Rivers arranged his presentation directly with Vicksburg Public Schools.

The main point of Mr. Bomberger’s presentation was that every life has purpose and to promote adoption. He told the story of how he was conceived in rape but his birth mom placed him for adoption.

According to the documented evidence, Mr. Bomberger provided you in advance with his detailed delivered remarks. Furthermore, you approved the remarks in advance of the presentation, Mr. O'Neill. It is established fact that on May 1<sup>st</sup>, Mr. Bomberger did not veer from the approved remarks at all during his presentation. This fact is established by documented video evidence from the May 1<sup>st</sup> presentation, which I have in my possession that confirms this fact.

Under the circumstances, you can understand the great shock and disappointment my client was faced with in reviewing the attached response published by the VPS’s administration. See enclosed **Exhibit A**. As I understand it, Vicksburg Public Schools did not contact my client until 24 hours *after* it disseminated the defamatory post.

This publication was disseminated by VPS via e-mail and Facebook and contains patently false and misleading statements. This publication constitutes defamation per se and therefore has made you and Vicksburg Public Schools liable for damages. Please appreciate the gravity of Vicksburg Public School’s actions; in your own words, you acknowledge that Mr. Bomberger is “*a nationally known motivational speaker*”; your false and defamatory post has damaged my client’s business reputation. By claiming that Mr. Bomberger’s presentation “*did not go per the Agreement*” you have effectively told the world that Mr. Bomberger cannot be trusted to deliver the remarks that he has agreed to. As you know, VPS’s statement was false. I will reiterate, that the damage you have unlawfully caused Mr. Bomberger and Radiance Foundation is severe.

My law firm has been retained for the purpose of filing a defamation lawsuit against you and Vicksburg Public Schools in the circuit court in Kalamazoo County. Prior to such a filing, at my client's request and as is my custom and practice, I am extending to you the opportunity to avoid litigation. If you wish to avoid a lawsuit, then you must take the following actions **within seven (7) days from the date of this letter:**

1. Post a public retraction and apology to Mr. Bomberger and Radiance Foundation on Vicksburg Public School's Facebook page, and on VicksburgCommunitySchools.org indicating that Vicksburg misrepresented the facts in its defamatory post.
2. Contact the parents and students of Vicksburg public schools via e-mail to retract your defamatory post about Mr. Bomberger and the Radiance Foundation.

We will verify that you have taken these actions at the end of the 7-day period. If you have not, then we will conclude that you would prefer a lawsuit and proceed accordingly. Be assured that if forced to file suit, we will seek not only damages but attorney fees and court costs.

Cordially,

DAVID & WIERENGA, P.C.

Jeshua T. Lauka

Enclosure: cc: Client



**Vicksburg Community Schools**

Yesterday at 10:15am · 🌐

On Tuesday, Vicksburg High School had contracted with a nationally known motivational speaker and group to address the student body. The agreed content of the presentation was intended to be about finding purpose and inspiration in life, but the presentation given instead ranged into topics that were overtly political and were discomfoting to many students and staff. High School Principal Keevin O'Neill sincerely apologizes for this and will be contacting the speaker and his organization to present his grievances. He will be happy to speak with anyone who wanted to give their feedback.

We very much apologize that this event did not go as per the agreement and people were offended. We are taking steps to ensure it does not happen as future events are planned.



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**Marilyn McKenzie** I am sorry that this happened, but maybe

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