

June 14, 2024

contact@osintguardian.com

Claudia Lopez
OSINTGuardian

RE: Silverstein Legal

Ms. Lopez:

We are the attorneys for Corey D. Silverstein, Silverstein Legal, Kevin Toll and Lawrence Waters (“Clients”). Your June 14, 2024 article on Medium.com contains several false statements about my Clients that are defamatory *per se* under Michigan law.

For example, you claim that Mr. Silverstein is the attorney “assigned” to various entities you claim create and distribute child pornography and are engaged in child trafficking. This is not true. Mr. Silverstein is the person designated under the Digital Millennium Copyright Act as the infringement agent for various entities. This simply means that, if a content provider believes his, her or its copyright is violated by a site, he, she or it may notify the site owner of the alleged infringement by providing notice to Mr. Silverstein. Your article implies much more significant and sinister involvement on the part of Mr. Silverstein and his firm with these sites which, in the context of your article, is defamatory.

Further, neither Mr. Silverstein nor any attorney associated with his firm received an on-line inquiry from you or anyone else using the domain osintguardian.com. Your contrary assertion and suggestion that Mr. Silverstein was hiding from your inquiries concerning his alleged involvement with companies you contend are involved in illegal activities, are clearly defamatory.

Your false statements place my Clients at serious risk of harm because you have falsely and publicly labeled them as “evil-looking” persons who abet child pornographers. Pursuant to MCL 600.2911(2)(b), we therefore demand that you remove all references to Mr. Silverstein, Mr. Toll, Mr. Waters and Silverstein Law from your article and publish a public retraction of the following statements:

- “It seems that Corey recently defended Clips4sale in an intellectual property case and won, ***so these people and this law firm*** seem to interact often.” “These people” in the context of the article means child pornographers and human traffickers. This is false.

- “It seems that Corey D. Silverstein has no problems *with appearing on a website flooded with child porn and having his name appear on the same website where there are pedophiles uploading images of missing children.*” This is false.
- “Now finishing the article, I will talk about Corey D. Silverstein, *which is the name that appears as the attorney assigned to all the shell companies and offshore companies owned by these criminals.*” This is false
- “The email was sent to the website admin and the email address of the designated attorney, which was Corey. I gave them a context of the situation so they knew it was important and I also said who I was. The email was opened by the website admin the same day it was sent and then on April 15, 2024 it was opened by the designated attorney who I deduce is Corey D. Silverstein.” This is false.
- “This law firm has been involved *as designated attorneys* for each and every one of these people’s offshore companies (including TechSoft Limited which is the current owner of smutty and pornxs).” This is false. Mr. Silverstein is the DMCA agent for these entities, only.
- “Kevin S. Toll and Lawrence G. Walters also work at the law firm. I don’t know why these last two have photos that look like something out of an evil character from a movie, but it makes me uncomfortable to see these two.” The reference is defamatory by implication.

The false statements about my Clients is extremely reckless and dangerous. Unhinged but well-meaning people may read your article and references to my Clients and attempt to harm them. See e.g. https://link.edgепilot.com/s/92a32f48/TOcU_exxv0WnRfx_OnlwJQ?u=https://www.npr.org/sections/the-wo-way/2017/06/22/533941689/pizzaqate-qunman-sentenced-to-4-years-in-prison

Thus, while Mr. Silverstein, Mr. Toll and Mr. Waters are strong proponents of the First Amendment, they also respect their right to be free from clearly defamatory statements designed to endanger them and their families.

We look forward to your retraction.

Very truly yours,
Maddin, Hauser, Roth & Heller, P.C.

Kathleen H. Klaus

Kathleen H. Klaus

cc: Corey D. Silverstein
Kevin S. Toll
Lawrence G. Waters