

[DATE]

**Via CMRRR #**

[RECIPIENT'S NAME]

[STREET ADDRESS]

[CITY], [STATE] [ZIP]

Dear [RECIPIENT]:

We represent [CLIENT NAME]. If you are represented by legal counsel, please direct this letter to your attorney immediately and have your attorney notify us of such representation.

*[Use the following for bullying]*

You are hereby directed to CEASE AND DESIST ALL BULLYING OF [CLIENT NAME]'S CHARACTER AND REPUTATION. [CLIENT NAME] has spent years building a positive reputation and is a young person with excellent integrity and credibility. [CLIENT NAME] has learned that you have engaged in spreading false, destructive, and defamatory rumors about *her/him*.

*[Use the following for cyberbullying]*

You are hereby directed to CEASE AND DESIST ALL CYBERBULLYING OF [CLIENT NAME]. "Cyberbullying" means bullying that is done through the use of any electronic communication device, including through the use of a cellular or other type of telephone, a computer, a camera, electronic mail, instant messaging, text messaging, a social media application, an Internet website, or any other Internet-based communication tool.

*[Use the following for all instances]*

Under Texas's David's Law, it is unlawful to harass another by bullying. Violations include, but are not limited to, any targeting of [CLIENT NAME] by a single significant act or a pattern of acts by one or more students directed at another student that exploits an imbalance of power and involves engaging in written or verbal expression, expression through electronic means, or violating physical conduct, and *[choose one or more as applicable:]*

*that has the effect or will have the effect of physically harming a student, damaging a student's property,*

*or placing a student in reasonable fear of harm to the student's person or of damage to the student's property;*

*is sufficiently severe, persistent, or pervasive enough that the action or threat creates an intimidating, threatening, or abusive educational environment for a student;*

*materially and substantially disrupts the educational process or the orderly operation of a classroom or school;*

*infringes on the rights of the victim at school.*

[DESCRIBE CIRCUMSTANCES AND/OR DESCRIPTION OF HARASSMENT].

Your statements have targeted [CLIENT NAME] and violate David's Law.

Accordingly, we demand that you (A) immediately cease and desist your unlawful bullying of [CLIENT NAME] and (B) provide us with prompt written assurance within ten (10) days that you will cease and desist from further bullying of [CLIENT NAME].

If you do not comply with this cease and desist demand within this time period, [CLIENT NAME] may file suit against you in court, seeking monetary damages and equitable relief for your conduct. In the event you fail to meet this demand, please be advised that [CLIENT NAME] has asked us to communicate to you that [*he/she/family*] will pursue all available legal remedies, including seeking monetary damages, injunctive relief, and an order that you pay court costs and attorney's fees. Your liability and exposure under such legal action could be considerable.

Before taking these steps, however, my client wished to give you one opportunity to discontinue your illegal conduct by complying with this demand immediately.

I recommend that you consult with an attorney regarding this matter. If you or your attorney have any questions, please contact me directly.

Sincerely,