



AFFELD GRIVAKES ZUCKER LLP

2049 Century Park East, Suite 2460
Los Angeles, CA 90067
TEL (310) 979-8700
FAX (310) 979-8701
www.agzlaw.com

March 19, 2014

Via Regular Mail and Facsimile (570) 323-4192

Mr. Clifford Rieders
161 West Third Street
P.O. Box 215
Williamsport, Pennsylvania 17703-0215

Re: Goldberg adv. Klein

Dear Mr. Rieders:

This responds to your March 17, 2014 letter. We appreciate that you have abandoned the false accusation in your March 6, 2014 letter that Mr. Goldberg was using the website www.mortklein.com for fundraising purposes. Your newest accusations are also false.

You falsely assert that Mr. Goldberg has used to website for financial gain. Mr. Goldberg is not seeking any financial advantage for himself or any other person or entity, including but not limited to this law firm. If you have any evidence to the contrary, please let us know what it is.

Further, your statement that Mr. Klein's name has "financial significance" is groundless. Again, please let us know if you have any evidence for your allegation. Has anyone, including Mr. Klein, ever obtained a financial benefit by using his name? If so, please explain when and how.

We also disagree with your allegation that Mr. Goldberg is impersonating Mr. Klein. Mr. Goldberg is not creating any false impression whatsoever as to who is behind the website. He has not created any fake e-mail addresses, nor has he falsely attributed any statements contained on the website to Mr. Klein or to any other person. The *Golb* case is therefore totally inapposite, and Mr. Goldberg will not be intimidated by your threat to seek his criminal prosecution for his exercise of his First Amendment rights.

It is Mr. Goldberg's intent to accurately inform members of the public who want to learn the truth about Mr. Klein. By considering the material on the website along with other publicly available information, members of the public will draw their own conclusions about the

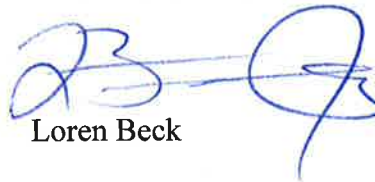
president of the ZOA. That is a legally protected reason for Mr. Goldberg to use the website www.mortklein.com.

You have made serious, albeit shifting, accusations about Mr. Goldberg having a financial motive for the website www.mortklein.com. If you have any facts that support those accusations, please let us know what they are. We will then discuss your information with Mr. Goldberg and advise him accordingly. If you are unable or unwilling to do so, we will conclude that you are simply trying to chill Mr. Goldberg's exercise of his First Amendment rights by making willfully false accusations.

Mr. Klein is mistaken if he believes he can bully Mr. Goldberg into forgoing any of his rights with the threat of criminal prosecution and civil litigation. Mr. Klein should know better.

We look forward to hearing from you.

Very truly yours,

A handwritten signature in blue ink, appearing to be 'Loren Beck', with a stylized, cursive script.

Loren Beck