

1.2 Defendant, TERRI LEO WILSON is an individual and is currently an incumbent member of the Texas House of Representatives for District 23 (“Leo Wilson”) who is involved, in her private capacity, as a candidate for reelection. Defendant may be served at 305 21st Street, Suite 241, Galveston, Texas. At all times material to the claims and causes of action alleged herein, Defendant was acting in her individual capacity as a citizen seeking votes in a primary election, not in her official capacity as an elected official.

II.
DISCOVERY LEVEL

2.1 Pursuant to Civil Procedure Rule 190.3 discovery should be conducted under Discovery Control Plan Level 2.

III.
JURISDICTION AND VENUE

3.1 This Court has jurisdiction of this action pursuant to Texas Government Code § 24.007.

3.2 Plaintiff’s action against Defendants is properly maintainable in Chambers County because the Foundation’s principal office is located in Chambers County, all or a substantial part of the events giving rise to Plaintiff’s claims as well as the harms resulting from Defendant’s false and malicious disparagement occurred in Chambers County, Texas. Venue in Chambers County is mandatory pursuant to Texas Civil Practice and Remedies Code § 15.017 and proper pursuant to Texas Civil Practice and Remedies Code § 15.002(a).

IV.
BACKGROUND FACTS

4.1 Plaintiff is an Education Foundation designed to help educators implement creative learning projects for students Pre-K - 12. The Foundation is an independently governed, duly incorporated organization, operating under the laws of the State of Texas and over which the Barbers Hill ISD Board of Trustees exercises significant control by virtue of the membership of the Education Foundation’s governing board.

4.2 The Foundation has limited powers under its Certificate of Formation and is organized exclusively for educational purposes, that is, to “receive and disburse funds, property and gifts of any kind exclusively for the benefit of Barbers Hill Independent School District in Chambers County, Texas” and to support the educational mission of the Barbers Hill Independent School District and further the educational interests of its pupils.

4.3 At the heart of the Foundation are corporate and individual friends of Barbers Hill ISD who believe in the value of education and are willing to invest in the leaders of tomorrow. Through the tax-deductible donations of teachers, individuals and businesses, the Foundation provides grants directly to educators who have fresh, new ideas for programs that help students not only learn, but remember. The Foundation actively seeks donations from individuals, teachers, and local companies to support its mission. The Board is comprised of elected officials and community leaders, including leaders in the local oil and gas industry. As an organization dedicated to supporting teachers and students, the Foundation enjoys a positive reputation, and the strength of that reputation is critical to building community ties, it facilitates working with others who value education, and helps the Foundation obtain donations.

4.4 Defendant is currently a member of the Texas House of Representatives for District 23 running for re-election to the Texas House of Representatives to represent District 23 in the upcoming March 3, 2026 Republican primary. Her opponent serves as a Director on the Foundation’s Board and a community member.

4.5 On February 1, 2026, Defendant, as a political candidate for office and unrelated to her official duties, published a series of posts on her Facebook page asserting that the Foundation had engaged in conduct that she characterized as “illegal.” The post was not issued as part of any legislative proceeding, investigation, or official action, but rather was made on Defendant’s personal campaign page, with the disclaimer that her words were her own personal views.

State Representative Terri Leo Wilson ✓
 Yesterday at 12:32 AM · 

"He also faces criticism over his employer's relationship with the Barbers Hill Education Foundation (BHEF), which includes a "partnership" to develop a luxury apartment complex. BHEF has also purchased property valued at more than \$6 million from Americus Holdings.

Watkins said his role with the education foundation (Director of the Fund) while receiving an investment for his company (Americus Holdings) did not present a conflict of interest."

"I think based on what I have discovered between the ISD and the education foundation and his directorship (of the education foundation) that he is running to make legal what may be illegal," said Leo Wilson.

Holly Hansen
 January 29 at 1:40 PM · 

The GOP primary race between Terri Leo Wilson and challenger Nathan Watkins has grown heated over allegations concerning Leo Wilson's record as a lawmaker and W... [See more](#)



THETEXAN.NEWS
Heated GOP Primary for Southeast Texas House District Draws Scrutiny Over Public School Education Foundation Spending

 4 104 shares

 Like  Comment  Share

4.6 Defendant's disparaging and false post was repeated in other Facebook pages, including "Talk of Bacliff-San Leon."

Talk of Bacliff-San Leon · Join
 State Representative Terri Leo Wilson · 5d · 🌐

“He also faces criticism over his employer’s relationship with the Barbers Hill Education Foundation (BHEF), which includes a “partnership” to develop a luxury apartment complex. BHEF has also purchased property valued at more than \$6 million from Americus Holdings.

Watkins said his role with the education foundation (Director of the Fund) while receiving an investment for his company (Americus Holdings) did not present a conflict of interest.”

“I think based on what I have discovered between the ISD and the education foundation and his directorship (of the education foundation) that he is running to make legal what may be illegal,” said Leo Wilson.

Holly Hansen
 January 29 at 1:40 PM · 🌐

The GOP primary race between Terri Leo Wilson and challenger Nathan Watkins has grown heated over allegations concerning Leo Wilson’s record as a lawmaker and Watkins’ relationship with the largest education foundation in the nation.



THE TEXAN NEWS
Heated GOP Primary for Southeast Texas House District Draws Scrutiny Over Public School Education Foundation Spending

👍 Like 💬 Comment ➦ Share

4.7 Additionally, the two posts link to an article in *The Texan*, which is a statewide political news organization, available to anyone online. **See Exhibit A.** In the article, Ms. Leo Wilson is quoted as saying, “I think based upon what I have discovered between the ISD and the education foundation and his directorship that he is running to make legal what may be illegal.” While Defendant is party

to a heated primary challenge, the Foundation is apolitical, takes no part in either campaign, and is suffering from defamation and business disparagement as a bystander to Defendant's political attacks on her primary opponent. Regardless of the outcome of the election, the Foundation's good name and charitable purposes will be irreparably tarnished if Defendant isn't immediately ordered to cease making false accusations against it. Defendant should be immediately enjoined from advancing her own political aspirations by intentionally and recklessly damaging a charitable institution.

4.8 On February 4, 2026, Plaintiff, through its counsel, sent a cease-and-desist letter to Defendant, notifying her of the false and defamatory nature of her postings and informing her of the actual facts involved in the activities of the foundation she criticized. *See Exhibit B.* Upon information and belief, Defendant removed the posting the following day after receiving the letter notifying her of the correct factual information. Subsequently, Defendant reposted the same false and defamatory information, evidence of actual malice.

4.9 Defendant's publication of false and defamatory statements about the Foundation, including the unfounded assertion that the Foundation's activities are unlawful, harms the reputation of the Foundation and has and will continue to result in reputational and monetary damage to the business of the Foundation for which Plaintiff seeks compensatory and injunctive relief.

V. CAUSES OF ACTION

A. FIRST CAUSE OF ACTION: DEFAMATION, LIBEL AND SLANDER

5.1 The facts alleged in Section IV, above, are incorporated herein for all purposes.

5.2 The Facebook social media posts alleging "illegal conduct" by the Foundation constitute defamation or libel and slander *per se* under Texas law. False accusations imputing alleged illegal conduct on behalf of another are inherently defamatory.

5.3 The elements of libel and slander *per se* in Texas are: (1) publication of a false statement of fact to a third party; (2) that defamed the plaintiff; (3) with the requisite degree of fault (negligence

for private figures, actual malice for public figures) regarding the truth of the statement; and (4) the statement must fall within one of four specific categories that make it defamatory *per se*. *Bedford v. Spassoff*, 520 S.W.3d 901, 904 (Tex. 2017)

5.4 Under Texas law, defamation *per se* entitles a plaintiff to presumed damages without requiring proof of actual harm. *Waste Mgmt. of Tex., Inc. v. Tex. Disposal Sys. Landfill, Inc.*, 434 S.W.3d 142, 151 (Tex. 2014).

5.5 As a private nonprofit foundation, Plaintiff is a private entity and Plaintiff need only prove only negligence in the defamatory posts. *Dickson v. Afya Center*, 636 S.W.3d 247 (Tex. App.—Dallas 2021).

5.6 The act of removing the post after receiving factual information rebutting the false statements contained in the cease-and-desist letter and immediately reposting it, provides evidence of actual malice, which entitles Plaintiff to recover exemplary damages. *Hand v. Hughey*, 2016 WL 1470188, 6 (Tex. App.—Fort Worth Apr. 14, 2016, no pet.)

5.7 Facebook posts and news articles constitute publication to third parties. *Exxon Mobil Corp. v. Rincones*, 520 S.W.3d 572, 579 (Tex. 2017).

5.8 Nonprofit corporations can maintain libel actions. *State Med. Ass'n of Tex. v. Comm. for Chiropractic Ed.*, 236 S.W.2d 632 (Tex. App.—Galveston 1951, no writ)

5.9 Plaintiff is entitled to damages, including presumed damages, actual compensatory damages, and exemplary damages, based upon the actual malice of the Defendant.

**B. SECOND CAUSE OF ACTION – BUSINESS DISPARAGEMENT
(INJURIOUS FALSEHOOD)**

5.10 Plaintiff incorporates the factual averments in Section IV, above, for all purposes.

5.11 Business disparagement is a distinct tort from defamation that protects economic interests rather than reputation. *Forbes Inc. v. Granada Biosciences, Inc.*, 124 S.W.3d 167, 170 (Tex. 2003).⁷

5.12 The elements are: (1) publication of false and disparaging information about the plaintiff, (2) with malice, (3) without privilege, (4) that resulted in special damages. *Hurlbut v. Gulf Atl. Life Ins. Co.*, 749 S.W.2d 762, 766 (Tex. 1987).

5.13 The false allegation that the Foundation engaged in “illegal conduct” directly disparages its operations and trustworthiness, and is reasonably calculated to call into question the business dealings of the Foundation, including discouraging potential donors from making donations to the Foundation.

5.14 The reposting of the false and disparaging content after the cease-and-desist letter informed Defendant of the falsity of her statements satisfies the malice element. *Hurlbut* at 766.

5.15 At trial, Plaintiff will prove special damages resulting from Defendant’s false and malicious postings, for which it seeks compensation.

VI. **INJUNCTIVE RELIEF**

A. REQUEST FOR TEMPORARY RESTRAINING ORDER PURSUANT TO RULE 680 AND TEMPORARY AND PERMANENT INJUNCTION PURSUANT TO RULE 681

6.1 Plaintiff requests that the Court enter injunctive relief to enjoin further false and defamatory statements regarding the Barbers Hill Education Foundation and to order Defendant to take down all postings in which she has made false and defamatory statements imputing or alleging criminal activities on the part of the Foundation.

6.2 To obtain temporary injunctive relief, a plaintiff must have a cause of action, show a probable right to relief, and demonstrate that it is faced with imminent irreparable harm. *Butnaru v. Ford Motor Co.*, 84 S.W.3d 198, 204 (Tex. 2002). A plaintiff has a probable right to relief if it has a cause of action for which relief may be granted. See *Universal Health Services, Inc. v. Thompson*, 24 S.W.3d 570, 577–78 (Tex. App.—Austin 2008, no pet.).

6.3 Plaintiff has pleaded valid causes of action and requested permanent relief. The Foundation has a probable right to such relief because under Texas common law, defamation *per se* involves written statements that are defamatory on their face without need for extrinsic evidence. Statements alleging illegal conduct, as present here, are considered defamatory *per se*. The element of publication is met by the posting on Facebook and statements made during campaign speeches and to the press alleging illegal conduct by the Foundation. The second element, that the statements alleging illegal conduct are inherently defamatory, is met because the statements are demonstrably false and harmful and specifically relate to the Plaintiff. The publication on Facebook in different communities as well as the publication in a statewide newspaper meet the publication to third party requirements. Finally, the reposting of the false statements after notification of falsity of the statement meets the negligence requirement applicable to defamation of private parties, such as the Foundation. For libel *per se*, damages are presumed and need not be specifically proven. The reposting after receiving the cease and desist letter constitutes prima facie evidence of actual malice. The Foundation's status as a private nonprofit likely makes it a private figure requiring only negligence, but even if its focus in supporting public education makes it a limited-purpose public figure requiring proof of actual malice, the malice may be presumed by publication after receipt of the cease-and-desist letter.

6.4 Additionally, Plaintiff is likely to prevail on the merits because under Texas common law, to prove Business Disparagement, the Foundation must establish: (1) publication of false and disparaging information about the Foundation's economic interests; (2) falsity; (3) malice - the defendant knew the statement was false or acted with reckless disregard for the truth; (4) without privilege; and (5) special damages - specific, measurable economic losses directly caused by the statements. The deliberate reposting after receipt of factual information in the cease-and-desist letter supports a finding of malice.

6.5 Granting the requested injunctive relief will not result in any harm to the public welfare. The false and defamatory statements in issue are being communicated for the purpose of Defendant's efforts to obtain voter support in the upcoming March Republican primary election. Because the election is ongoing, and Defendant is continuously repeating claims of illegal activity as to the business operations of the Foundation, the harm being caused by Plaintiff's statements is not only irreparable, but imminent.

6.6 Plaintiff requests that a Temporary Restraining Order be issued immediately, either with or without notice to Defendant. Every day that passes means that Defendant's false accusations against the Foundation, made in the context of the primary election, will be repeated and amplified. Plaintiff should not be forced to incur additional damage to its business interests by serving as a whipping post for the sole purpose of promoting Defendant's political aspirations.

6.7 Plaintiff agrees to post security in the amount and by the means to be determined by the Court. Because temporary injunctive relief will not present any injury to Defendant or the public, Plaintiff requests the Court set the bond for a nominal amount not to exceed \$200.

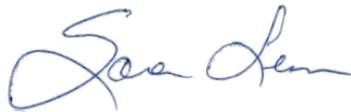
VII. **PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully prays that the Court:

- a. Enter a temporary restraining order prohibiting Defendant or her agents from making false assertions that the business activities of the Foundation are unlawful or illegal in any manner;
- b. Enter a temporary restraining order prohibiting Defendant or her agents from publishing, repeating, posing or re-posting social media posts containing defamatory content regarding the Foundation, and more specifically, alleging unlawful or illegal conduct on the part of the Foundation;

- c. Enter a permanent injunction prohibiting Defendant or her agents from publishing, repeating, posing or re-posting social media posts containing defamatory content regarding the Foundation, and more specifically, alleging unlawful or illegal conduct on the part of the Foundation;
- d. Enter a permanent injunction prohibiting Defendant or her agents from making false assertions that the business activities of the Foundation are unlawful or illegal in any manner; and
- e. Render judgment against the Defendant for damages to Plaintiff for defamation, libel, slander and defamation *per se*, and Business Disparagement, including an award for actual damages and exemplary damages for Defendant's tortious conduct, and pre- and post-judgment interest as permitted by law. Plaintiff further prays for any other relief in law and equity to which Plaintiff may show itself to be entitled.

Respectfully submitted,



Sara Hardner Leon
State Bar No. 08980250
Leon, Alcalá, Morse & Reynolds, PLLC
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Telephone: 512.637.4244
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hgraff@leoncalca.com

ATTORNEYS FOR PLAINTIFF

State of Texas §
 §
County of Chambers §

DECLARATION OF GREG POOLE

My name is Greg Poole. I am over the age of eighteen years, am of sound mind, and am capable of making this declaration. I am the Executive Director of the Barbers Hill Independent School District Education Foundation and Superintendent of Schools of the Barbers Hill Independent School District.

I have reviewed the attached Verified Original Petition and Request for Temporary Restraining Order, Temporary Injunction and Permanent Injunction. I verify that the facts stated therein are within my personal knowledge and are true and correct.



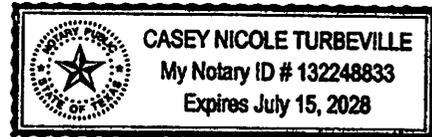
Greg Poole

Sworn to and subscribed before me on the 11 day of February, 2026.



Notary Public

4896-8918-6447, v. 1



“EXHIBIT A”

https://thetexan.news/elections/2026/heated-gop-primary-for-southeast-texas-house-district-draws-scrutiny-over-public-school-education-foundation/article_dee435e8-80ea-4a2a-8d7c-c0dfcd43feb3.html

Heated GOP Primary for Southeast Texas House District Draws Scrutiny Over Public School Education Foundation Spending

State Rep. Terri Leo Wilson faces a primary challenge from developer Nathan Watkins.

HOLLY HANSEN

JAN 29, 2026



Left to right: state Rep. Terri Leo Wilson (campaign photo) and Nathan Watkins (campaign photo). Background: Texas Capitol (The Texan/Daniel Friend).

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A heated Republican battle is emerging in southeast Texas, where state Rep. Terri Leo Wilson (R-Galveston) faces a primary challenge from a Chambers County developer in a race shaped by conflicting characterizations of Leo Wilson's voting record — and renewed scrutiny of a tiny school district's relationship with a lucrative non-profit public-school foundation.

Former Mont Belvieu City Manager Nathan Watkins, vice president at Americus Holdings Real Estate Development and a director of the Barbers Hill Independent School District's (BHISD) education foundation, announced last year that he would run against Leo Wilson for Texas House District 23, which includes Chambers County and part of Galveston County.

"I got into this race not to run against a person but for the district," Watkins told The Texan. "After the last legislative session, I heard from locally elected officials and people in the district that said they were looking for someone who's got a strong track record of delivering results."

First elected in 2022, Leo Wilson wields endorsements from President Donald Trump, Gov. Greg Abbott, U.S. Sen. Ted Cruz (R-TX), state Sen. Mayes Middleton (R-Galveston), and all four Galveston County commissioners. Both Abbott and Texas House Speaker Dustin Burrows (R-Lubbock) have traveled to Galveston to support her re-election campaign.

Watkins touts endorsements from three Chambers County commissioners, the Chambers County sheriff, and BHISD Superintendent Greg Poole, who has donated \$25,000 to his campaign.

Watkins has raised more than \$400,000 compared to Leo Wilson's \$180,000, with his most sizable donations totaling \$125,000 coming from the Texans for Good Government PAC run by Americus Holdings Managing Partner Andrew Schatte.

Some of the heaviest tactics exercised on his behalf, however, have been through the Texas Defense PAC, which is primarily funded by casino magnate Miriam Adelson, owner of Las Vegas Sands.

Texas Defense PAC has been flooding HD 23 households with mail and text messages accusing Leo Wilson of voting against property tax relief — a claim Leo Wilson denounced as patently false.

“I voted for property tax relief,” Leo Wilson told The Texan. “I voted for [House Bill] 3 but had voted against a previous version that did not include a sunset provision.”

Leo Wilson also pointed out that the pro-Watkins campaign materials cite her vote against an amendment to property tax reforms, but that the amendment in question was introduced by a Democrat and opposed by all but one House Republican.

Watkins said he has had nothing to do with the mailers mischaracterizing Leo Wilson’s voting record, since they were sent by a “third party.”

He also faces criticism over his employer’s relationship with the Barbers Hill Education Foundation (BHEF), which includes a “partnership” to develop a luxury apartment complex. BHEF has also purchased property valued at more than \$6 million from Americus Holdings.

Watkins said his role with the education foundation while receiving an investment for his company did not present a conflict of interest.

BHISD is responsible for educating fewer than 8,000 students and manages an annual budget of \$151 million, but between 2019 and 2022, the district transferred \$41 million to BHEF, and last year the board approved an additional grant of \$8 million.

At the end of 2024, the non-profit BHEF reported holding \$175 million, making it the largest education foundation fund in the United States. A recent report from the **Texas Public Policy Foundation** noted that they hold more than \$26.7 million in “**alternative investments.**”

Although BHEF’s website states that through “tax-deductible donations the Education Foundation can provide grants directly to educators,” the organization only **reported** providing \$106,240 in contributions and grants for the fiscal year ending June 2024.

Regarding the transferred funds, Watkins said they were related to tax abatement agreements allowed under a now-expired Texas program known as **Chapter 313.**

“Those are not taxpayer dollars that are flowing from the ISD into the foundation. They are associated with 313 agreements and every one of those has been approved by the Texas Comptroller.”

Former Chambers County Auditor Tony Sims has publicly questioned the legality of the ISD’s transfers to the education foundation, and told The Texan that the arrangement may allow the BHEF to invest funds in ways the ISD may not under the state’s **Public Funds Investment Act.**

Americus Holdings has also entered a **public-private partnership** with the Chambers County Local Government Corporation for a new county jail at a cost of \$168 million, for which Watkins is the project developer. Under the arrangement, the corporation issued bond debt for construction and Americus Holdings will lease the jail to the county for \$10 million per year.

Watkins dismissed concerns about the arrangement with **Chambers County** and the BHEF publicized by **Sims** as merely “campaign rhetoric.”

“All of the contracts with Chambers County were competitively bid,” said Watkins, who added that the transactions had been approved by the Texas Office of the Attorney General.

“We were responding to an unfunded mandate from the state of Texas to build a new jail and the county was proposing initially to go to the voters with a four-cent tax rate increase that likely was not going to be supported,” added Watkins.

Leo Wilson said she thinks that part of the reason Watkins is running is to address concerns about BHEF.

“I think based on what I have discovered between the ISD and the education foundation and his directorship that he is running to make legal what may be illegal,” said Leo Wilson.

“He told voters he was running against me to promote his business and over my votes for school choice and to ban taxpayer-funded lobbying but probably stopped after learning those are Republican Party platform issues.”

“I don’t mind if he attacks me on votes I’ve actually taken. That is fair game,” added Leo Wilson. “But these mischaracterizations of my votes are disingenuous.”

The two will meet in a candidate forum in Chambers County on Thursday and have several more scheduled over the next month.

Two Democrats, Cheryl Clark and Sean Foley, have also filed to run for HD 23, which is rated R-65% according to The Texan’s [Texas Partisan Index](#).

Holly Hansen

Holly Hansen is a Senior Reporter for *The Texan* where she has written extensively on criminal justice, public corruption, politics, and property rights, and is one of the state’s most recognized journalists covering Houston and Harris County. She is a frequent guest on radio and television shows, discussing local, state, and federal public affairs. She graduated from the University of Central Florida with a degree in History, has called Texas home for three decades, and now lives in the Austin area where she enjoys the outdoors and reading historic literature.

“EXHIBIT B”

LEON | ALCALA

ATTORNEYS AT LAW

February 4, 2026

CMRRR: 7018 2290 0000 7605 1688
and Via Electronic Mail: terrifortexas@gmail.com
Mrs. Terri Leo Wilson
305 21st Street, Suite 241
Galveston, TX 77550

Re: Cease and Desist and Notice of Potential Claim

Dear Mrs. Wilson,

On February 2, 2026, you published a Facebook post prefaced by the announcement “the views expressed are strictly my own.” In your statement, you suggested that the Barbers Hill Education Foundation has participated in conduct that you assert is “illegal.” This is obviously a very serious allegation, and troublingly, before making any effort to obtain facts to support your claim, you published the defamatory content notwithstanding the likely harm it would cause to the reputation and charitable business interests of the Foundation.

The Barbers Hill Education Foundation is 501(c)(3) nonprofit organization:

The Barbers Hill Education Foundation is a non-profit organization designed to help educators implement creative learning projects for students Pre-K - 12. At the heart of the Foundation are corporate and individual friends of Barbers Hill who believe in the value of education and are willing to invest in the leaders of tomorrow. Through the tax-deductible donations of these individuals and businesses, the Education Foundation can provide grants directly to educators who have fresh, new ideas for programs that help students not only learn, but remember.

The Barbers Hill Education Foundation actively seeks donations from individuals and local companies to support its mission. The Board is comprised of elected officials and community leaders, including leaders in the local oil and gas industry. As an organization dedicated to supporting teachers and students, the Foundation enjoys a positive reputation, and the strength of that reputation is critical to building community ties and as it facilitates working with others who value education and helps the Foundation gain donations.

The housing development that is the subject of your post provides housing discounts for city and school district employees, a critical need as the cost of housing in the community continues to soar as parents flock to the school district for the outstanding educational opportunities the school district provides. To insinuate that the Foundation’s investment in discounted teacher housing is somehow “illegal” is completely unsupported by fact. By couching your false and damaging accusations as “views” that are “entirely my own” does not insulate you from the damage caused by your uninformed and speculative accusations.

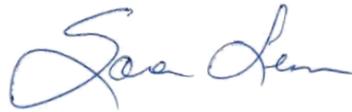
AUSTIN | HOUSTON | ARLINGTON | LONGVIEW

1114 Lost Creek Blvd., Suite 420, Austin, Texas 78746 | 512.637.4244 | leonalcala.com

You have a long record of supporting public education and I imagine that you would not wish to actively do harm to public school institutions that form part of your constituency. I am surprised that you would so freely cast public aspersion on the leaders of the same oil and gas industries that have endorsed your campaign. In your individual capacity, I anticipate that you do not want to be held personally liable for economic harm to the Foundation due to false and misleading allegations of criminal conduct, which could constitute *per se* defamation of the Foundation.

This letter is intended to serve as an immediate cease and desist demand that you refrain from alleging illegal conduct against the Barbers Hill Education Foundation. I further demand, on behalf of the Foundation, that you take down the offending post. I am finally asking that you notify all available insurance carrier(s) that may provide you coverage against claims of libel and slander that you notify them of the potential of a claim on behalf of the Barbers Hill Education Foundation.

Respectfully yours,



Sara Hardner Leon