

Hon. Marisa B. Perez-Diaz
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June 23, 2026

Via Certified Mail Return Receipt Requested & E-mail

Hon. Brandon Hall
SBOE District 11
204 Robert St.
Aledo, TX 76008

RE: FORMAL CEASE AND DESIST DEMAND, LITIGATION HOLD NOTICE, DEMAND FOR REMOVAL OF DEFAMATORY CONTENT, NOTICE OF COPYRIGHT INFRINGEMENT, AND NOTICE OF ANTICIPATED LEGAL ACTION

Dear Member Hall,

This correspondence serves as a formal demand that you immediately cease and desist from your unlawful conduct directed toward my family and I, that you remove all offending content, and that you and anyone acting on your behalf preserve all evidence relating to your actions, as your actions may result in legal action if you do not immediately comply with this demand.

It was brought to my attention that on Thursday, June 18, 2026, you utilized your Facebook campaign profile, "Brandon Hall for Texas" to publish two individual posts referring to me as a "Marxist." In one of these posts, you pulled a photo of me in my official capacity at my full-time job to make these salacious allegations. Your conduct includes, but is not limited to, publishing and republishing my photographs and likeness without authorization, using copyrighted photographs and images associated with my employer without permission in violation of federal copyright law, making false and defamatory statements concerning me, portraying me in a false light, and engaging in conduct that has foreseeably exposed my family and I to threats, intimidation, harassment, and potential violence.

Your actions have caused or may foreseeably cause substantial personal, professional, and reputational harm. More importantly, your conduct has created legitimate concerns for the safety and security of my family. As an elected official, you are fully aware that public accusations, inflammatory rhetoric, and targeted publications can encourage harassment by third parties. Nevertheless, you have continued this conduct yourself in a way that is not only unprofessional and uncalled for but that appears intended to incite harm and violence.

In the three and half years serving with you, I have strived to treat you professionally and with courtesy; and while we sit diametrically opposed on policy, I have never engaged in personal ad hominin attacks. Your actions against me are unethical, unacceptable and not becoming of anyone representing our great State of Texas.

Accordingly, you are hereby directed to immediately:

CEASE ALL UNLAWFUL PUBLICATIONS

- 1) Remove all posts, publications, videos, emails, campaign materials, websites, social media content, advertisements, and communications that contain my image, likeness, or photograph; Images depicting my family; Images depicting me engaging in work for my employer, workplace, facilities, logos, trademarks, or copyrighted materials; False statements concerning my character, integrity, political views, conduct, employment, motives, or reputation.
- 2) Refrain from publishing any future content concerning me unless such statements are demonstrably true and supported by competent evidence.
- 3) Refrain from encouraging, soliciting, endorsing, or amplifying attacks directed toward me, my family, or my associates.

PRESERVE ALL EVIDENCE

You are hereby placed on formal notice of anticipated litigation. Accordingly, you must immediately suspend any document destruction, deletion, overwriting, auto-delete functions, message expiration settings, or other practices that may result in the loss of relevant evidence.

You are directed to preserve all potentially relevant evidence, including but not limited to:

- Social media posts, comments, replies, reposts, direct messages, and drafts;
- Text messages, Signal messages, WhatsApp messages, Telegram messages, and any other electronic communications;
- Emails and email attachments;
- Campaign communications;
- Communications with political consultants, campaign staff, volunteers, advisors, attorneys, donors, supporters, and third parties;
- Photographs, videos, screenshots, and metadata;
- Website content and revision histories; and/or
- Records identifying all persons involved in creating, editing, approving, publishing, or disseminating the offending content.

This preservation obligation extends to all devices, accounts, cloud storage repositories, campaign systems, personal devices, government-issued devices, backup systems, and third-party platforms under your possession, custody, or control. Any destruction, alteration, concealment, deletion, or spoliation of evidence after receipt of this notice may subject you to sanctions, adverse evidentiary inferences, monetary penalties, and additional causes of action.

DEADLINE FOR COMPLIANCE

Within 48 hours of receipt of this notice, provide written confirmation that:

- All offending content has been removed;
- A litigation hold has been implemented;
- No evidence has been destroyed or altered;
- All relevant records have been preserved; and
- You will refrain from future publication of defamatory or infringing content.

If you fail to comply, I am prepared to pursue all available legal remedies without further notice, including emergency injunctive relief, temporary restraining orders where appropriate, expedited discovery, preservation orders, damages, attorney's fees, costs, and any other relief authorized by law. Nothing contained herein constitutes a waiver of any claim, remedy, cause of action, privilege, or right. All rights are expressly reserved.

Govern yourself accordingly.

Cordially,

A handwritten signature in black ink, appearing to read 'Marisa B. Perez-Diaz', with a stylized, cursive script.

Marisa B. Perez-Diaz, M.Ed.
Texas State Board of Education
District 3 Board Member