

LAW OFFICES OF  
**CREECH, LIEBOW & KRAUS**

A PROFESSIONAL CORPORATION  
333 West San Carlos Street, Suite 1600  
San Jose, California 95110  
(408) 993-9911  
Facsimile  
(408) 993-1335

Edward A. Kraus  
Peter A. Liebow  
Randall C. Creech

Of Counsel

Reed & Roth  
Steven J. Roth  
Chuck Reed\*

\*Inactive

October 23, 2014

**VIA EMAIL ONLY**

Aaron Ettinger  
[REDACTED]  
[REDACTED]

**Re: Declaration of Aaron Ettinger**

Dear Mr. Ettinger:

I represent Victor Ajlouny in relation to a Declaration you submitted to the Press on October 23, 2014 (hereinafter "Declaration") regarding statements you attribute to my client. If you have retained counsel, please forward this correspondence to your counsel.

I write to ask you to retract the Declaration as it relates to your attribution of comments allegedly made to you by Mr. Ajlouny. You are well aware that many of the statements in your correspondence you attribute to Mr. Ajlouny are not true and defame Mr. Ajlouny's character.

For example, Mr. Ajlouny never said he wanted to get Sergeant Unland fired. Mr. Ajlouny would not seek to interfere with the Sergeant's job with the City of San Jose.

Another example is you state that Mr. Ajlouny asked you if you "wanted to make some money." Again, the context of the comment is implying some unethical behavior on the part of Mr. Ajlouny for you to join him in making money over your resignation from the City of San Jose and your wish to be rehired.

You are aware that those statements were never made and you mischaracterized the conversation with Mr. Ajlouny, a conversation between you and an old family friend. You then made these false statements publicly for some unknown purpose. I can only surmise that your purpose is to ruin Mr. Ajlouny's reputation and character in the community.

Aaron Ettinger  
October 23, 2014  
Page 2

Mr. Ajlouny is a well respected political consultant and ruining his reputation can result in actual harm to Mr. Ajlouny's livelihood. Therefore, to mitigate any damage that has already occurred by your actions, I demand you immediately retract the false statements and Declaration in order to mitigate any harm to Mr. Ajlouny's reputation.

Very truly yours,

CREECH, LIEBOW & KRAUS



EDWARD A. KRAUS

EAK/sa