



Jeffrey C. O'Brien  
Direct Dial: (612) 336-1298  
[jobrien@chestnutcambronne.com](mailto:jobrien@chestnutcambronne.com)

**Chestnut Cambronne PA**

100 Washington Avenue South  
Suite 1700  
Minneapolis, MN 55401-2138  
T 612.339.7300  
F 612.336.2940

[www.chestnutcambronne.com](http://www.chestnutcambronne.com)

Licensed to practice in Minnesota, Wisconsin,  
Iowa and South Dakota

*MSBA Board Certified Real Property Specialist*

February 9, 2023

**VIA EMAIL AND U.S. MAIL**

Minnesota Gun Rights

Attn: Ben Dorr

[ben@minnesotagunrights.org](mailto:ben@minnesotagunrights.org)

1080 Hwy 3 South

Northfield, MN 55057

Re: Minnesota Gun Owners Caucus

Dear Mr. Dorr:

Please be advised that our firm has been retained by Minnesota Gun Owners Caucus ("MNGOC") regarding the continued false, misleading, and defamatory statements made by your organization, Minnesota Gun Rights, and/or its representatives; specifically your fundraising email of February 2, 2023. These statements are clearly designed to tortiously interfere with MNGOC's operations and longstanding support from Minnesota's 2<sup>nd</sup> Amendment supporters, and to cause MNGOC harm.

Specifically, MN GOC takes issue with the following false statements made in your email:

- You attribute the statement of a WCCO news reporter to MNGOC's Political Director, Rob Doar regarding "room for compromise with Democrats on improving Minnesota's safe storage laws and going after straw purchases of guns", as if Mr. Doar made the statement himself. You are misleading the reader that MNGOC and Mr. Doar support these measures, which they do not.

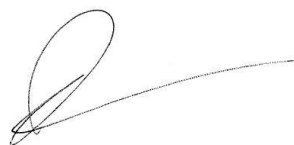
- You state that Mr. Doar “was literally going from office-to-office whipping votes for ‘government-mandated storage laws’ in order to ‘compromise’ with the DFL who have control of the Legislature.” Again, this is patently false, as Mr. Doar did no such thing.

Your malicious attempts to disseminate libelous and defamatory material about my client is in violation of Minnesota law and has caused serious and irreparable injury to my client, its reputation, and its business. MNGOC will not stand by and permit your misconduct to continue. Accordingly, please be advised that this correspondence serves as our client’s demand that you **IMMEDIATELY CEASE AND DESIST IN PUBLISHING AND/OR SOLICITING DEFAMATORY STATEMENTS ABOUT MNGOC.**

Please be advised that this correspondence in no way attempts to restrict legitimate free speech. Our client believes in legitimate debate regarding issues, and it appreciates that your organization disagrees with MNGOC’s approach, despite the fact that this approach has yielded tangible results for Minnesota gun owners. MNGOC also does not seek to dissuade you from expressing your incorrect opinions about it and its representatives, Mr. Doar and Bryan Strawser. MNGOC has endured your antics and inaccurate representations for years without a response. Your recent email communication and website pages crosses the line into outright falsehoods and violates our client’s rights and reputation, and MNGOC can no longer stay silent. Your earlier statements may have been excused by ignorance of the legislative process and MNGOC’s organizational activities, but your recent actions show an intentional effort to defame MNGOC and tortiously interfere with their operations.

Sincerely,

**CHESTNUT CAMBRONNE PA**

A handwritten signature in black ink, appearing to read "Jeffrey C. O'Brien", with a long horizontal flourish extending to the right.

Jeffrey C. O'Brien

cc: Bryan Strawser, Minnesota Gun Owners Caucus  
Rob Doar, Minnesota Gun Owners Caucus