

[Redacted]

November 29, 2023

Via United Parcel Service and US Mail:

Dennis Chairez and Avalon Chairez

[Redacted]

Re: Sage Collegiate Public Charter School
Cease and Desist Demand
Our File No.: 00975

Dear Mr. and Ms. Chairez,

I represent Sage Collegiate Public Charter School (“Sage”). It has come to Sage’s attention that you are illegally video-recording their students and staff on its campus. By this letter, Sage demands that you cease and desist immediately.

While your camera is located on the roof of your shed, it is pointed towards Sage’s private property, where hundreds of children and staff conduct school activities. Under Nevada law, this is a violation of their privacy rights. Specifically, your conduct constitutes the tort of intrusion upon seclusion. *See e.g., PETA v. Berosini*, 111 Nev. 615, 895 P.2d 1269 (1995).

Sage hereby demands the removal of your video camera immediately. If you fail to do so by December 4, 2023, it will be forced to enforce its legal rights through other means. Govern yourselves accordingly.

Sincerely,

[Redacted Signature]

[Redacted]

Cc: *Via US Mail* - [Redacted]

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