

# **EXHIBIT 110**



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January 21, 2022  
VIA E-MAIL

Andrew Morton  
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191 North Wacker Drive, Ste. 2300  
Chicago, IL 60606-1633

**Re: Notice of Contractual Breach and Demand for Return of Access to BCS' Social Media Accounts**

Dear Andrew:

We write on behalf of our client, Breaking Code Silence, a 501(c)(3) nonprofit based in California ("BCS"). This is a formal demand that your client, Katherine McNamara, promptly return access to all of BCS's social media accounts, including BCS's twitter account (#breakingcodesilence, at - <https://twitter.com/BreakingCodeSi1>), BCS's Facebook/Instagram Account ("breakingcodesilenceofficial," at <https://www.instagram.com/breakingcodesilenceofficial/>), BCS's Facebook Survivor Group (<https://www.facebook.com/groups/breakingcodesilence>), BCS's TikTok account (<https://www.tiktok.com/@breakingcodesilence>), and BCS's Youtube/Google Brand Account (<https://www.youtube.com/c/BreakingCodeSilence/videos>) (collectively, the "Social Media Accounts"). Ms. McNamara's continued withholding of these social media accounts has harmed and continues to harm both BCS and the very community BCS seeks to serve.

BCS's mission to empower child abuse survivors and promote positive social change through self-advocacy depends principally on its ability to contact, engage, and mobilize the survivor community through its social media outlets. We understand Ms. McNamara, as a former board member and volunteer for BCS, resigned from her role on December 9, 2021, to pursue other opportunities. We are at a loss to understand however, why Ms. McNamara is actively trying to prohibit the BCS community from communicating by closing off all access to BCS's Social Media Accounts, or why Ms. McNamara has actively worked to disparage BCS and its mission on those same platforms by, for instance, altering BCS's Twitter Summary to read "[j]ust another Twitter Account," and renaming BCS's Facebook group for child abuse survivors to "[j]ust another Facebook group." Ms. McNamara's conduct jeopardizes the ability of children, youth and adults who where or are incarcerated and suffering abuse from communicating with an organization dedicated to helping them be released and overcome their abuse. Ms. McNamara's conduct serves no purpose other than her own vindictiveness.



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As a former BCS employee and board member, Ms. McNamara entered into a Volunteer Agreement, Volunteer Non-Disclosure and Confidentiality, and Code of Conduct agreements providing that all “[c]ontent writes . . . contacts established, accounts created and any other materials, intellectual or otherwise created, established, or maintained for Breaking Code Silence will be returned to Breaking Code Silence” upon “request of Breaking Code Silence” or upon termination of the volunteer position. (July 4, 2021 Volunteer Non-Disclosure and Confidentiality Policy) (emphasis added.) This is a formal notice that Ms. McNamara is in breach of those agreements based on her refusal to turn over account access despite repeated demands from BCS in mid and late December, 2021.

BCS herein renews its demand that Ms. McNamara promptly return control of all of BCS’s Social Media Accounts to ensure that BCS can continue to serve the survivor community. We understand Ms. McNamara is similarly devoted to serving this same community, which is why BCS is hopeful that the two parties can resolve this dispute without the need for further legal action.

\* \* \*

As discussed above, BCS reiterates its demand for return of account access to BCS’s Social Media Accounts. Ms. McNamara must comply with this request no later than January 26, 2022. We think it is in both parties’ interest to avoid any need for formal legal action, particularly given such action will detract from BCS’s important work. Nonetheless, absent confirmation of prompt compliance, BCS will seek court intervention to the extent necessary to secure its accounts and preserve its ability to serve its community.

We are also aware of other conduct by Ms. McNamara that has jeopardized BCS’s mission. We are currently conducting an investigation and will forward you our findings in a follow-up letter next week. BCS reserves all rights, and nothing herein should be construed as a waiver of any of its rights.

Best regards,

**DLA Piper LLP (US)**

A handwritten signature in blue ink that reads 'Tamany J. Vinson Bentz'.

Tamany J. Vinson Bentz  
Partner

cc:  
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