

January 14, 2022

**VIA EMAIL**

Mr. Daniel Tait  
Energy and Policy Institute  
P.O. Box 170399  
San Francisco, California 94117-0399

*RE: Demand for Retraction of False Statements in Article Related to Matrix, LLC*

Dear Mr. Tait:

Our firm represents Matrix, LLC (“Matrix”) and its principal, Dr. Joseph W. Perkins, Jr., both of whom were subjects of your January 13, 2021, article posted to the Energy and Policy Institute website. Your article makes multiple misstatements that are significant enough to warrant a retraction. I write to correct these misstatements and demand they be retracted and corrected through every medium in which they have been published.

First, your article links Matrix to “‘ghost-candidate’ election scandals in Florida” and goes on to make additional misleading statements about Matrix’s involvement in these campaigns. As you note in the article without crucial context, Matrix is currently engaged in litigation with a group of former employees led by Jeff Pitts. Matrix has sued Mr. Pitts and the other former employees because, while employed by Matrix, they conducted secret, off-the-books communications campaigns that were not authorized by Matrix or Dr. Perkins. Neither Dr. Perkins nor any Matrix employee provided legitimate services to or had any direct or indirect involvement in any of the Florida ghost candidate campaigns. To the extent Mr. Pitts or others were involved with any ghost candidate campaign, their involvement was without Matrix’s knowledge or consent and contrary to Matrix policy.

Similarly, your article refers to Richard Alexander as “a Matrix operative who ran the [sic] Grow United.” This statement is false. Mr. Alexander has never been a Matrix employee or independent contractor, and Matrix has never been involved with Grow United. To the extent Mr. Pitts or others at his direction were involved with Grow United, those activities were never authorized and were kept secret from Matrix and Dr. Perkins. Your suggestion without any proof that Matrix was involved in the Florida ghost candidate scheme is wrong and requires retraction.

Second, your article also erroneously links Matrix to the 2018 “North Birmingham bribery scandal.” Not only was Matrix not “at the center”—as you write—of the bribery of Oliver Robinson, neither Dr. Perkins nor anyone at Matrix was involved in the planning or formation of any strategy related to the potential superfund site. Your article wrongly states that “Pitts testified . . . that Matrix

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was involved in faking grassroots support to help” those implicated in the North Birmingham superfund site.” This statement is both unsupported and false. The Twitter profile to which your article links as apparent support for this ridiculous false charge does not contain any information to support your assertion. Instead, the Twitter profile, apparently recounting Mr. Pitts’s testimony in the bribery trial, paraphrases Mr. Pitts’s statement that someone “reached out to him” about the North Birmingham campaign and that he was later provided with a document. Never once does this summary of Mr. Pitts’s testimony suggest that he or anyone at Matrix was involved in bribing Mr. Robinson or any other illegal or inappropriate activities. They certainly were not. Your article’s assertion that Matrix played a role in the bribery is false and also requires retraction.

Please immediately publish a retraction of your article’s false statements and promote or publicize the retraction in the exact same manner as your original article. Should you fail to publish a retraction or continue your careless and defamatory representations about Matrix or any of its employees, we will be forced to take immediate legal action.

Please confirm in writing as soon as your retraction has been published. I can be reached by email at [cason@campbellpartnerslaw.com](mailto:cason@campbellpartnerslaw.com).

Sincerely yours,



Cason M. Kirby  
Attorney at Law

cc: Andrew P. Campbell  
Harris Hagood  
Sarah Beth Sanders