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September 29, 2026

Via First-Class mail and E-mail

Val Hoyle for Congress
PO Box 657
Springfield, OR 97477
Ed@Valhoyle.com

Legal Support
YouTube (Google LLC)
901 Cherry Ave.
San Bruno, CA 94066
Legal@Support.Youtube.com

RE: Notice of Representation and Demand for Immediate Advertisement Pull Down.

To whom it may concern,

My name is Tony Aiello, Jr. and my office has been retained to represent Monique DeSpain and Monique DeSpain for Congress concerning Val Hoyle's false statements of material fact in a YouTube advertisement. **The Monique DeSpain for Congress campaign demands the immediate pull down of this false and defamatory advertisement which are being circulated in violation of Oregon election law by the Val Hoyle Campaign on YouTube. ORS 260.532.**

The subject advertisement contains at least two demonstrably false and defamatory claims which violate Oregon election law:

FALSE Claim No. 1: Monique DeSpain is endorsed by the Constitution Party of Oregon.

Monique DeSpain is not endorsed by the Constitution Party of Oregon. Even more importantly, the Constitution Party of Oregon *does not exist* as a major or minor political party in Oregon. <https://sos.oregon.gov/elections/Pages/voteinor.aspx>.

Val Hoyle knows or should have known that her competitor has not been endorsed by a non-existent party which will not be on the ballot and is not recognized by Oregon's Secretary of State. Her claims to the contrary are defamatory and completely fabricated.

FALSE Claim No. 2: Monique DeSpain pledged to criminalize abortion without exception.

Monique DeSpain is on the record and clear about her stance on women's reproductive rights, including stating publicly and explicitly that she 1) opposes a national abortion ban and 2) firmly believes and has stated that women's healthcare decisions should be up to women only. https://youtu.be/DITacYB1Ypc?si=PBrrFSAPxMY2_rtv.

The linked YouTube video is two years old, publicly available, and completely refutes Val Hoyle's false and defamatory claims.



Val Hoyle's advertisement states that it was "Approved by Val Hoyle" and "Paid for by Val Hoyle for Congress." By circulating this advertisement, Val Hoyle has violated Oregon election law.

Oregon law provides that "No person shall cause to be written, printed, published, posted, communicated or circulated," any electronic advertisement which "contains a false statement of material fact relating to any candidate, political committee or measure." ORS 260.532(1).

Val Hoyle's statements constitute a serious violation of Oregon election law which entitles Monique DeSpain, as the candidate who has been aggrieved by Val Hoyle's lies, to seek monetary damages and even Val Hoyle's removal from office should she be elected. ORS 260.532(6), (8).

Therefore, Monique DeSpain demands this advertisement's immediate pull down and removal from all platforms, websites, social media accounts, advertising networks, and other channels through which it is being published, distributed, displayed, or otherwise communicated.

Thank you for providing this matter your immediate attention,

Tony Aiello, Jr., Shareholder

Tyler Smith & Associates, P.C.

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