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April 4, 2012

Rev. Dr. Steven L. Ullestad  
Northeastern Iowa Synod  
201 – 20<sup>th</sup> Street SW  
P O Box 804  
Waverly, IA 50677-0804

Dear Rev. Dr. Ullestad:

I am the attorney for Dan Skogen. At a meeting of the members of West Prairie Lutheran Church on February 12, 2012, you made a false statement to the members that Dan Skogen had “flunked out” of seminary.

Under Iowa law, defamation in the form of slander occurs when untrue oral statements are published and injure a person's good name and reputation. *Barreca v. Nickolas*, 683 N.W.2d 111, 116 (Iowa 2004); *Kennedy v. Zimmermann*, 601 N.W.2d 61, 64 (Iowa 1999). The plaintiff must show the defendant (1) published a statement that (2) was defamatory (3) of and concerning the plaintiff, and (4) resulted in injury to the plaintiff. *Kiesau v. Bantz*, 686 N.W.2d 164, 175 (Iowa 2004).

Each of the elements of slander occurred as a result of your statement.

In lieu of legal action being pursued, this letter is to demand that you mail a letter of apology to Dan Skogen, 1970 50th Street, Marion, Iowa 52302 and publish a copy of the letter in the next edition of the Northeastern Iowa Star which is the monthly synod newsletter. You must also attend a regular Sunday church service of the West Prairie Lutheran Church within 30 days from the date of this letter to publicly apologize to the members for your false statement.

You are cautioned that false statements regarding Dan Skogen will not be tolerated and all legal options will be reviewed should such wrong conduct occur in the future.

Very truly yours,

A handwritten signature in blue ink that reads 'David J. Siegrist' with a long horizontal flourish extending to the right.

David J. Siegrist  
Attorney at Law

CC: Dan Skogen