



January 25, 2024

Taylor Swift
c/o Katie Wright Morrone
Venable LLP

Via Electronic Mail Only

Re: GRNDCTRL to Taylor Swift

Dear Ms. Wright Morrone,

Along with Ethan Jacobs of Ethan Jacobs Law Corporation, I represent Jack Sweeney and his company, GRNDCTRL, LLC, and write in response to your letters demanding that they discontinue the Instagram account @taylorswiftjets. We expect that this response will conclude the matter, but please direct any future correspondence to us.

Put simply, there is nothing unlawful about GRNDCTRL's use of publicly accessible information to track private jets, including those used by public figures like Taylor Swift. GRNDCTRL used the same information to track sanctioned Russian oligarchs and Elon Musk. See Aimee Picchi, *Meet the American teen tracking Russian oligarchs' jets*, CBS NEWS (Mar. 7, 2022), <https://www.cbsnews.com/news/jack-sweeney-teen-tracking-russian-oligarch-jets-elon-musk/>. The @taylorswiftjets account is engaged in protected speech that does not violate any of Ms. Swift's legal rights.

Your letter makes that clear by failing to identify any legal claim. Only in a footnote to your December 22, 2023 letter do you flirt with asserting a stalking claim under California law—but the language just before the words you quote explains that a stalker is someone who makes a “credible threat” against a victim. Cal. Civ. Code § 1708.7, subd. (a)(3)(A). Our clients have never made any threats against Ms. Swift and your letter does not suggest they have done so.

Further, your letter's tone of alarm is unfounded. Our clients' website only provides the location of private jets using publicly available information. That information poses no threat to Ms. Swift's safety.

We do not know why you believed the best claim against an individual in Florida and his company is a California statute, but that, combined with the absence of any credible legal claim, suggests a groundless effort to intimidate and censor our

clients. We doubt Ms. Swift will pursue meritless legal action, but if she does, we will defend our clients' rights.

Sincerely,
Slater Legal PLLC

A handwritten signature in black ink, appearing to read 'James Slater', with a long horizontal stroke extending to the right.

James Slater

cc (via email):

Ethan Jacobs

[Redacted]

[Redacted]

[Redacted]

[Redacted]