



245 Alcazar Avenue  
Coral Gables, Florida 33134  
305-677-6707  
JSuarez@continentalpllc.com

March 25, 2026

VIA HAND DELIVERY  
MARCH 27, 2026

Via E-Mail Only

Mr. Joe Sanchez  
[joesanchezformiamidade@gmail.com](mailto:joesanchezformiamidade@gmail.com)

my  
#1028  
3-31-26  
1220pm

**Re: Cease and Desist – Defamatory Statements Regarding Hon. Vicki L. Lopez**  
**Demand for Immediate Retraction and Correction**

Mr. Sanchez:

Our law firm is counsel to Miami-Dade County Commissioner Vicky L. Lopez in connection with the willful, malicious, and legally indefensible campaign of defamation you have undertaken against her. You are placed on formal notice to cease immediately, retract publicly, and correct the record.

The political arena is not a consequence-free zone for the deliberate destruction of a person's reputation through knowing falsehoods. Commissioner Lopez has earned her standing in this community through decades of public service. She is not a pardoned felon. She is a citizen whose wrongful conviction was erased by the Supreme Court of the United States because it should never have occurred.

You have publicly represented through text messages and other communications reported to our office that our client was convicted of a felony commonly referred to as "misprision," and that the only reason she is not a convicted felon today is because she received a pardon. That statement is categorically, demonstrably, and unequivocally false in every material respect. You either know this and are lying, or you have made no effort to learn the truth before broadcasting it.

The premise of your statement is a fabrication, and its defamatory sting is precisely calculated to suggest that she is a criminal who required forgiveness. However, as you know, a court of law confirmed she never committed a crime.

The truth, which we trust is not lost on you given your years of service in law enforcement, is that Commissioner Lopez's wrongful conviction was *vacated* — not by pardon, not by politics, and not by the exercise of executive mercy, but by the operation of law following a definitive ruling by the Supreme Court of the United States. *See Skilling v. United States*, 561 U.S. 358 (2010). Commissioner Lopez was fully and legally absolved as a direct consequence of that decision. A vacatur wipes the conviction from existence as though it never occurred, because the law itself does not support it. In other words, Commissioner Lopez was fully vindicated. Your

public representations corrupt this reality into its precise opposite. You have told voters that she is a pardoned felon. She is neither.

Under Florida law, a statement of fact that is false, that is published to a third party, and that causes damage to the reputation of the subject is actionable defamation. When, as here, the false statement imputes the commission of a crime (i.e., the conviction of a felony), the statement constitutes defamation *per se*. In such cases, Florida law presumes damages and our client need not prove specific harm to prevail. *See Sultan v. Walgreen Co.*, 324 So. 3d 563, 564 (Fla. 3rd DCA 2021) (“[W]hen the claim is defamation *per se*, liability itself creates a conclusive legal presumption of loss or damage and is alone sufficient for the jury to consider punitive damages.”) (citing *Lawnwood Med. Ctr., Inc. v. Sadow*, 43 So. 3d 710, 729 (Fla. 4th DCA 2010)); *Roque v. Swezy*, 51 Fla. L. Weekly 146 (Fla. 3rd DCA 2026) (holding that defamation *per se* creates a “presumption of injury”).

Your statements were not made in a vacuum. They were made in the context of a political campaign, directed at voters, with the specific intent of damaging Ms. Lopez’s electoral prospects. That intent is relevant not only to actual malice — which strips you of any qualified privilege you might otherwise attempt to assert — but also to a claim for punitive damages under Florida law.<sup>1</sup>

The causes of action for which you are exposed include, without limitation, (a) defamation *per se* under Florida common law; (b) defamation by implication, to the extent your statements omit material context with the purpose of conveying a false impression; and (c) punitive damages, based on your knowing and malicious publication of statements you knew to be false.

This letter constitutes the notice required under Section 770.01, Florida Statutes.<sup>2</sup> Failure to adequately correct, apologize for, and/or retract your false statements will leave Commissioner Lopez no choice but to vindicate her rights through appropriate legal action. Commissioner Lopez expressly reserves all her rights going forward. Because of the ongoing nature of this dispute, please preserve all evidence potentially relevant to your false statements and take affirmative steps to ensure that no potentially relevant documents, data, communications, or evidence—whether physical or electronic—are deleted, lost, or destroyed. Failure to take preservation steps can result in severe sanctions being imposed against you by a court for spoliation of actual or potential evidence.

Govern yourself accordingly.

Sincerely,

/s/ Jesus M. Suarez  
FOR THE FIRM  
CONTINENTAL PLLC

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<sup>1</sup> Even as to a public figure, where false statements of fact are made with actual malice — that is, with knowledge of their falsity or with reckless disregard for their truth or falsity — the First Amendment provides no shelter. *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964).

<sup>2</sup> This letter also complies with Florida’s anti-SLAPP statute, § 768.295, Fla. Stat.