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March 5, 2026

VIA EMAIL: lrebecchi@smart-union.org

Mr. Luke Rebecchi
Counsel for SMART, Local Union No. 23
International Association of Sheet Metal, Air, Rail and Transportation Workers
1750 New York Ave NW, Suite 6000
Washington, D.C. 20006

RE: JAG Ketchikan – Demand to Cease and Desist – Publication of
Personal Identifying Information

Dear Mr. Rebecchi:

This firm represents JAG Ketchikan, LLC (“JAG”). We write regarding material recently published by the Union on publicly accessible internet platforms concerning JAG and its President, Douglas Huff.

The Union’s publication includes personally identifying information, including Mr. Huff’s personal residential address and descriptions and a nonpublic photo of his personal residence and property. The dissemination of this information on publicly accessible websites unnecessarily exposes Mr. Huff and his family to potential harassment, intimidation, and misuse of personal information and raises serious safety concerns for his household.

JAG recognizes that labor organizations have the right to engage in lawful advocacy and to express opinions regarding employers and labor matters. This

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correspondence does not request that the Union remove commentary, opinions, or other advocacy concerning JAG or its operations. However, publishing an individual's private residential address and related personal information serves no legitimate labor purpose and instead targets an individual and his family in a manner that raises serious safety and harassment concerns.

The publication of a private residential address during an ongoing labor dispute may reasonably be interpreted as an attempt to encourage harassment or intimidation of an individual and his family. Courts and administrative agencies have recognized that conduct commonly referred to as "doxxing"—the publication of personal identifying information for the purpose of encouraging harassment or intimidation—may fall outside the protections afforded to otherwise protected advocacy when the conduct targets individuals rather than legitimate labor issues. The targeting of an individual executive's residence in connection with a public campaign relating to the operation of the Ketchikan Shipyard also raises serious concerns that the publication is intended to apply personal pressure through harassment rather than to address legitimate labor issues concerning JAG's operations.

Accordingly, JAG hereby demands that the Union immediately:

1. Remove and delete from all websites, social media platforms, and other internet postings any personal identifying information, including but not limited to Mr. Huff's residential address or other location-specific information relating to his residence or family;
2. Cease and desist from publishing or disseminating residential addresses or similar personal identifying information relating to JAG personnel; and
3. Provide written confirmation within five (5) days of receipt of this letter that the Union has removed the above-referenced information and will refrain from republishing it.

Nothing in this correspondence should be construed as a waiver of any rights or remedies available to JAG or its personnel under federal or state law. JAG expressly reserves all rights, including the right to pursue appropriate relief before

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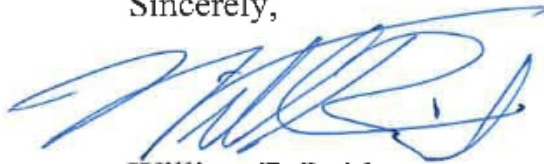
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the National Labor Relations Board or other appropriate forum should this conduct continue.

JAG expects that the Union and the individuals responsible for authorizing or publishing the material will take immediate steps to ensure the removal of the personal identifying information described above.

The Union is requested to preserve all documents and electronically stored information relating to the creation and publication of the above-referenced material, including communications, drafts, metadata, internal correspondence, and communications with third parties concerning the posting. JAG hopes this matter can be resolved promptly and without the need for further action. Please govern yourself accordingly.

Sincerely,



William E. Reid

WER/amt

Cc: Joshua Huff (via email: joshua.huff@jagmarinegroup.com)

Will Earnhart (via email: wearnhart@bhb.com)