

December 22, 2023

Via Electronic Mail and Hand Delivery

Re: *Cease and Desist and Demand Letter re Taylor Swift*

Dear Mr. Sweeney:

Please be advised that Venable LLP represents Ms. Taylor Swift ("Client"). We understand that you are the individual operating the Instagram account @taylorswiftjets, and the Threads account by the same name (the "Offending Accounts"). For the past year, through these Offending Accounts, you have engaged in stalking and harassing behavior, including consistently publishing real-time and precise information about our Client's location and future whereabouts to the public on social media. This conduct poses an imminent threat to the safety and wellbeing of our Client and must stop. We request that you immediately cease and desist from any further publication of this information, remove all currently-posted content on the Offending Accounts, and permanently terminate the operation of the Offending Accounts (and any similar accounts involving our Client).

You are notorious for disregarding the personal safety of others in exchange for public attention and/or requests for financial gain. We are aware of your public disputes with other high-profile individuals and your tactics in those interactions, including offering to stop your harmful behavior only in exchange for items of value.¹ While this may be a game to you, or an avenue that you hope will earn you wealth or fame, it is a life-or-death matter for our Client. Ms. Swift has dealt with stalkers and other individuals who wish her harm since she was a teenager. Indeed, there are many public cases of individuals who have come to Ms. Swift's residences, including those armed with weapons and ammunition, and attempted to harm her. This reality has forced our Client to live her life in a constant state of fear for her personal safety. That fear is and has been significantly heightened due to your reckless actions. Because the Offending Accounts share "live" updates on her destination and the exact time our Client will arrive at a given location, you essentially provide individuals intent on physically harming her, or with nefarious or violent intentions, a roadmap to carry out their plans.

¹ See, e.g., <https://www.cnn.com/2022/01/30/business/elon-musk-private-jet-twitter/index.html>; <https://www.tampabay.com/life-culture/2022/07/06/florida-student-tracking-elon-musks-jet-doesnt-plan-to-stop>.