



BREWER LAW FIRM, LLC  
Post Office Box 1847  
510 Mill Street #2B (29464)  
Mt. Pleasant, South Carolina 29465

May 16, 2025

**VIA EMAIL AND CERTIFIED MAIL**

The Honorable Nancy R. Mace  
United States House of Representatives  
1728 Longworth House Office Building  
Washington, DC 20515

**AND**

Nancy Mace  
295 Seven Farms Drive, Suite C-186  
Charleston, SC 29492

**AND**

Nancy Mace  
900 Island Park Drive, Suite 260  
Daniel Island, SC 29492

**408 SETTLEMENT COMMUNICATION**

**Cease and Desist  
Demand for Retraction  
Demand for Preservation of Evidence**

**RE: Defamatory Publications by Congresswoman Mace About Patrick Bryant**

**Dear Rep. Mace:**

Patrick Bryant has hired **Brewer Law Firm, LLC**, to represent his interests in regard to certain false and defamatory statements published by Congresswoman Nancy Mace about Patrick Bryant.

In recent weeks and/or months, Rep. Mace has published– and continues to publish– to third-parties, false allegations that Bryant and other individual(s) committed serious

aggravated criminal acts. Not only are these publications false and defamatory, but Rep. Mace knows these defamatory allegations are false, and/or that there is no evidence supporting such false and defamatory allegations.

**Please accept this letter as an immediate demand to cease and desist, to retract all defamatory statements, to preserve all evidence of records in anticipation of litigation..**

**A. Liability for Mace's Defamatory Publications:**

Rep. Mace has admitted to witnesses that Mace's repetition of these false and defamatory publications would likely expose her to suit for defamation. Indeed, as you are aware, Mr. Brian Musgrave has already filed a federal civil lawsuit against Mace related to this matter in the United States District Court for the District of South Carolina.

We have conducted witness interviews with persons to whom Mace has persisted in communicating these false and defamatory publications to, while acting outside the course and scope of her duties with Congress. Witnesses have confirmed that Mace has admitted to defaming Mr. Bryant as part of a personal scheme to benefit Mace, personally, and not for any legitimate, protected purpose.

Moreover, there is substantial evidence showing that Mace has continued to publish such false allegations to third parties, media organizations, and other individuals in person, on social media, in interviews, and public speeches and/or statements. It is our position that such allegations fall far outside the bounds of any applicable privilege. The continued defamatory statements and conduct by Mace have not only resulted in irreparable harm and substantial damages to Mr. Bryant, but they also threaten to severely undermine Mr. Bryant's rights as they relate to any and all law enforcement investigations into the matter.

**B. Bryant's Demand to Cease & Desist and for Retraction.**

Given the false, shocking, repulsive, and utterly baseless allegations of criminal conduct against Mr. Bryant, by Rep. Mace, Mr. Bryant will be forced to consider a suit for injunctive relief. South Carolina law will presume that Rep. Mace's publications are false and defamatory, and that Bryant has, or will have, suffered grave presumed harm as a result.

Mr. Bryant demands an immediate retraction of past defamatory statements, in addition to ceasing any future publications.

**C. Bryant's Demand to Preserve Evidence.**

In light of these defamatory and slanderous publications, the legal entities, and/or individuals, in receipt of this email are witnesses, and/or have an obligation to take immediate steps, if they have not already done so, to preserve evidence relevant to these claims. You have an obligation to preserve such information in whatever form it is generated and maintained. In general, you are required to preserve **all information** that

relates to Bryant's claims against Mace. This preservation is inclusive of, but is not limited to, any and all record(s), video(s), audio(s), photograph(s), security and/or surveillance footage(s), receipt(s), report(s), complaint(s), witness and/or third-party information and/or statement(s), research, and/or correspondence(s), i.e., e-mail, text message, photo, voicemail, recording, social media post, social media messaging, social media video and/or audio recording(s), etc., that were relied on and/or used by you, and/or any known witness to have libeled and defamed Bryant. This specifically includes any and all communications and messages communicated by Mace, or to Mace, through the use of Snapchat, Signal, and/or Telegram. Each and every communication on these apps, relevant to the allegations herein, should be screenshot, and/or saved, as each communication occurs.

This requirement applies to paper copies, as well as electronically stored information ("ESI") on removable or portable electronic storage media and your personal/home and/or business/work computer(s). All ESI and/or other records which are in the possession, custody and/or control of your , and/or any of your employees, independent contractors, officers, directors, agents and/or representatives, and which contain information related to Bryant's claims, including, but not limited to all correspondences, e-mails, text messages, telephone logs, photos, voicemails, recordings, social media posts, social media messages, social media videos and/or audio recordings, internet usage files, network access information, and information on other kinds of media, including PDAs (such as Google®, Android®, iPhone® or other "smart phones"), and digital voice-mails, must be retained and preserved until full resolution of Bryant's claims.

You are obligated to preserve all ESI in its originally created and/or "native" format. In addition, You should retain any and all non-electronic documents and evidence in whatever form, including personal and/or desk files, calendars, notes, correspondences, drafts (complete or incomplete), policies, manuals, reports, complaints, information, research, photos, social media posts, social media messages, social media videos, security and/or surveillance video and/or footage, spreadsheets and/or any and all other things relevant to Bryant's claims.

Please allow this correspondence to serve as a formal notice to you that any and all documents, including but not limited to, records, reports, correspondences (in any format, e-mail, text message, voicemail, recording, social media posts, social media messaging, social media video and/or audio recording(s), etc.), notes, surveillance footage and/or surveillance video, surveillance audio, invoices, receipts, memorandums, letters and/or notices, whether in your actual possession and/or in your constructive possession or in the possession of your officers, or those in receipt of this letter should, **under no circumstances**, be destroyed, disposed of, or transferred from your ownership, possession, or constructive possession for any reason without a Court Order allowing the same. With regard to any and all electronic documents, data, and/or information in your possession responsive to this request, such materials should not be destroyed, and the appropriate steps should now be taken to preserve these materials.

Moreover, these specific preservation requirements extend to any and all electronic devices, computers, laptops, ipads, mobile devices, phones, or any other device used by you (including the data and storage contained therein, on any separate storage, or in any cloud storage) to store, write, draft, post, upload, communicate, email, text, or otherwise store or communicate the libelous communications in question. This may require your immediate retention of counsel to advise you on how to preserve the requested information and devices. Often, during litigation, parties may state that they have lost the requested information, or that the devices have been harmed or destroyed, due to no fault of their own. These are not valid excuses since you are on notice to immediately preserve the information and devices, by notice of this letter.

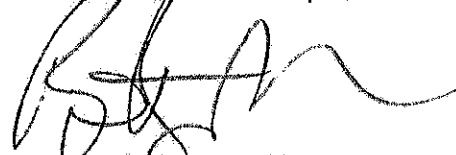
Be advised that the documents and materials referenced above are all discoverable under South Carolina law. For the law governing the failure to properly preserve and maintain evidence in South Carolina, see *Silvestri v. General Motors Corps*, 271 F.3d 583 (4th Cir. 2001). Spoliation refers to the destruction or material alteration of evidence or to the failure to preserve property for another's use as evidence in pending or reasonably foreseeable litigation. The duty to preserve material evidence arises not only during litigation, but also extends to that period before litigation when a party reasonably should know that the evidence may be relevant to anticipated litigation. id.

Failure to preserve and retain information could significantly impact Bryant. Further, your duty to preserve any and all written communications on any mobile app intended to immediately delete messages. That means that Mace should cease using such apps to communicate about Bryant, and/or that she should snapshot each and every such communication she sends, before she sends it. Consequently, if you are unsure whether certain information should be preserved, they should err on the side of caution and preserve the information until they have spoken to an attorney about the same. If you have any questions about how to preserve certain ESI, please ask them to contact you about those issues.

With kind regards, I remain

Very truly yours,

BREWER LAW FIRM, LLC

A handwritten signature in black ink, appearing to read 'Barrett R. Brewer', with a stylized flourish extending to the right.

Barrett R. Brewer, Esq.

BRB/nmr  
Enclosures

cc: Client (Via E-Mail w/enclosures)  
Andrew B. Moorman, Esq. (Via E-Mail w/enclosures)