



Krista L. Baughman
kbaughman@DhillonLaw.com

November 12, 2019

VIA EMAIL AND U.S. MAIL

Mr. Ian R. Greensides
19925 Stevens Creek Blvd, Ste 100
Cupertino, CA 95014-2384
(408) 660-8050
ian@greensides.com

**Re: *R Wang v. Ian Greensides*
Cease and Desist Concerning Defamation *Per Se***

Dear Mr. Greensides:

This firm represents Mr. R. “Ray” Wang in connection with his legal claims against you, arising from your defamation of his character. The purpose of this letter is to inform you of the facts and evidence supporting our client’s claims, demand that you immediately cease and desist from further illegal conduct toward Mr. Wang, and explore whether a settlement can be reached before we initiate litigation. Please direct all communication regarding this matter to our office.

Factual Background

On August 26, 2019, you published several provably false statements of fact about Mr. Wang, both on the social networking system NextDoor.com, and in emails you sent to Cupertino City Council members and Planning Commissioners. Among these statements, you claimed that Mr. Wang sent “revenge porn to a City Council candidate in Redwood City; that Mr. Wang was criminally charged with sending “revenge porn” and did not contest the charge; and that these “facts” were confirmed by San Mateo County court records and news publications. Not only are each of these statements provably false, but the evidence confirms that you made them with a reckless disregard for their falsity, and out of actual malice for Mr. Wang.

The true facts are as follows: over 15 years ago, Mr. Wang was charged with three violations of the California Penal Code in an action captioned *The People of the State of California vs. Ray Kuang Wang*, San Mateo Superior Court, Case No. SM328047A. See **Exhibit**

A (case docket from San Mateo Superior Court).¹ As crystal clear from the court docket, Mr. Wang pled “No Contest” to the single misdemeanor charge (PC 653m(b), Annoying Telephone Call to Place of Work), and **pled not guilty** to the remaining two felony charges (PC 529(3), Personate to Make Other Liable, and PC 530.5, Unauthorized Use of Personal Identification) – neither of which accused him of sending “revenge porn.” The docket further reflects, without ambiguity, that on January 13, 2004, Mr. Wang entered a plea of no contest to the misdemeanor count, and that all remaining counts were dismissed, without any finding of guilt. *See* Exhibit A (“[u]pon motion of people all remaining counts dismissed. Reason: negotiated plea.”). The docket further reflects that Mr. Wang was ordered to pay a fine “to State restitution fund” and complete 50 hours of public service work; there is no mention of any attorney fee payment.

Nowhere in the criminal case docket, or in the underlying Penal Code statutes, is “revenge porn” discussed. The widely accepted definition of revenge porn is “the distribution of sexually explicit images or videos of individuals without their permission.”² *See also* Cal. Penal Code §647(j)(4) (California’s “revenge porn” statute, criminalizing “[a] person who intentionally distributes the image of the intimate body part or parts of another identifiable person, or an image of the person depicted engaged in an act of sexual intercourse, sodomy, oral copulation, sexual penetration, or an image of masturbation by the person depicted or in which the person depicted participates, under circumstances in which the persons agree or understand that the image shall remain private...”). We are aware of no source – governmental or otherwise – indicating that Mr. Wang has engaged in the conduct of sending revenge porn to anyone.

Despite these facts, on August 26, 2019, you published the following statements on NextDoor.com, addressed to Mr. Wang (*see* **Exhibit B**):

- “You plead no contest to sending revenge porn. The record was later expunged after you completed your sentence of community service and paid restitution in the form of attorney’s fees, and a certain amount of time passed.”
- “I went back and looked at the San Jose Spotlight article – it appears that you plead no-contest in two cases: one for the revenge porn, and one for making harassing phone calls to someone at work...[including link to <https://sanjosespotlight.com/cupertino-policymaker-in-hot-water-for-past-sexual-harassment-lawsuit/>]”;
- “@Ray I’m not sure of the difference between revenge porn and signing someone up for porn sites. Maybe you could explain. I don’t have experience in either one of them...I reviewed the San Mateo County online docket. It confirms what was reported in the press.”)

¹ The docket for this case can be accessed, for free, via the San Mateo Superior Court’s website http://www.sanmateocourt.org/online_services/odyssey_portals.php.

² *See* https://en.wikipedia.org/wiki/Revenge_porn.

Further, on August 26, 2019 you sent an email to Cupertino City Council members and Planning Commissioners, stating that “[Mr. Wang] continues to make repeated false comments on ND [NextDoor] about his computer having been hacked by a real estate developer in 2003, when he was charged with two felonies and one misdemeanor for having revenge porn sent to a City Council candidate in Redwood City...”

Each of these statements is provably false. First, Mr. Wang has never been charged with sending revenge porn to anyone, and by your own concession, you used this term with a reckless disregard for what it meant. *See* Exhibit B (“I’m not sure of the difference between revenge porn and signing someone up for porn sites.”) The sending of revenge porn is a crime under California Penal Code 647(j)(4).

Second, Mr. Wang did not “plead no contest to sending revenge porn” – as is clear from free and publicly accessible court records (Exhibit A), Mr. Wang pled no contest only to a single misdemeanor charge, and vigorously denied the remaining charges, which were dismissed without a finding of guilt.³

Third, your false statements are not supported by either the court docket or “what was reported in the press,” as you claim. Indeed, the San Jose Spotlight article that you cite nowhere mentions the term “revenge porn,” and instead confirms what this letter describes: that Mr. Wang “pleaded no contest to a misdemeanor charge of ‘making annoying telephone calls to a place of work.’” The article also discusses allegations that Ms. Rosanne Foust made against Mr. Wang in a civil lawsuit, but notes that Mr. Wang vigorously opposed the allegations, and that the lawsuit ultimately settled with no adjudication of guilt. *See* <https://sanjosespotlight.com/cupertino-policymaker-in-hot-water-for-past-sexual-harassment-lawsuit/>.

Suffice it to say, while a reasonable reader would understand your comments to mean that Mr. Wang has sent – and has admitted to sending – revenge porn, these statements are false, lack any corroboration from external sources, and are directly contradicted by court records. Your decision to broadly and inaccurately summarize the disposition of a 16-year old criminal case against Mr. Wang supports a finding that you published the statements with malice, as does your express admission that you didn’t know what “revenge porn” was when you accused Mr. Wang of sending it.

Your Legal Liability to Mr. Wang for Defamation *per se*

Defamation is an “invasion of the interest in reputation” that involves the intentional publication of a statement of fact that is false, unprivileged, and has a natural tendency to injure or which causes special damage. *Gilbert v. Sykes* (2007) 147 Cal.App.4th 13, 27; *Wong v. Jing* (2010) 189 Cal.App.4th 1354, 1369. Publication occurs when the statement is communicated to at least one person other than the plaintiff who understands its defamatory meaning and that it

³ Nor was the criminal record in this case “expunged,” nor did Mr. Wang “pa[y] restitution in the form of attorney’s fees,” as is clear from the docket.

refers to plaintiff. *Shively v. Bozanich* (2003) 31 Cal.4th 1230, 1242. Defamation *per se* exists when the false statement charges plaintiff with, among other things, criminal activity. Civ. C. §46(1); *see also McGarry v. University of San Diego* (2007) 154 Cal.App.4th 97, 112. When defamation is alleged against a public figure, the plaintiff must also prove that the defendant knew the statements were false or had serious doubts about the truth of the statements, when made.

As discussed above, you falsely stated that Mr. Wang sent revenge porn, that he was criminally charged with sending revenge porn, and that he pled no contest to that charge. None of this is true – in fact, Mr. Wang never sent or was charged with having sent revenge porn; both felony charges filed against him in 2003 were contested and ultimately dismissed with no finding of guilt; and Ms. Foust’s civil complaint against him was similarly dismissed with no finding of guilt. Your false statements also suggest that Mr. Wang is lying to the public about the 2003 criminal case (“[h]e continues to make repeated false comments on ND...”), and that he sought to hide or “expunge” the criminal record by “pa[ying] restitution in the form of attorney’s fees,” which is also false.

Further, it is clear from the evidence that you made these statements knowing them to be false and/or with serious doubts about their truth. By your own admission, you had no idea what “revenge porn” was when you accused Mr. Wang of being implicated with it. What’s more concerning, although you are a lawyer yourself, and you apparently “reviewed the San Mateo County online docket,” your statements directly contradict those records, meaning you lacked a reasonable ground for believing that your statements were true when you published them. In addition, you have a motive to defame Mr. Wang, given your opposition to Mr. Wang’s position on Cupertino’s housing crisis. This evidence strongly supports a malice finding, sufficient to demonstrate a probability of prevailing on the defamation claims. *See, e.g., Reader’s Digest Assn. v. Sup. Court* (1984) 37 Cal.3d 244, 257-258 (factors such as hostility to plaintiff, using biased, unreliable sources, and making inherently improbable assertions may indicate defendant had “serious doubts” regarding truth of publication).

You intentionally made your statements to Mr. Wang’s constituency and colleagues in the Cupertino City Council. Although Mr. Wang will not be required to prove actual damages stemming from your defamation *per se*, he is regrettably suffering ongoing harm to his reputation, profession, and occupation as a result of your actions. As your conduct was malicious, Mr. Wang will also be entitled to recover punitive damages, should this matter proceed to trial.

Your Duty to Preserve All Evidence

Litigation is likely to ensue in this matter. Under governing state and federal laws, you are hereby placed on notice that you have an obligation to maintain hard copies of documents, as well as all e-mail and other electronically stored information, pertaining to this dispute and the surrounding events, including all communications with or about Mr. Wang.

You must retain all copies of material that exist on any storage medium, including sources of data such as portable hard drives, memory cards, “thumb drives,” blackberry, personal digital assistants, mobile telephones, iPods®, and smartphones. This list is not exhaustive; these potential locations of relevant data are included by way of example only, and all documents relating in any way to the dispute set forth herein must be preserved. It may be necessary for you, or other persons under your control, such as managers, employees, and agents, to take affirmative steps to ensure that evidence is not destroyed. **Please take such steps immediately. Failure to do so could result in, among other things, court imposed sanctions and criminal charges.**

Demand

As a result of the facts set forth above and the evidence already in our possession, we are highly confident in Mr. Wang’s ability to prevail on his claims at trial. However, in recognition of the effort and expense inherent in litigation, Mr. Wang is willing at this time to engage in settlement discussions to determine whether a resolution can be reached to resolve this issue. A settlement must include a retraction and correction of each of the defamatory statements discussed above, sufficient to inform all recipients of the inaccuracies of your factual assertions, and a public apology to Mr. Wang.

We request a response to this proposal no later than November 20, 2019. Meanwhile, Mr. Wang reserves all rights to seek redress for his grievances, which we continue to investigate. If you have any questions about the contents of this letter, please contact me or my colleague, Dorothy C. Yamamoto. We look forward to your prompt response.

Regards,



Krista L. Baughman

Exhibit A

Case Information

SM328047A | The People of the State of California vs. RAY KUANG WANG

Case Number
SM328047A
Court
Criminal
File Date
09/19/2003
Case Type
Complaint
Case Status
Adjudicated

Party

Defendant
WANG, RAY KUANG
DOB
XX/XX/XXXX

Charge

Charges
WANG, RAY KUANG

	Description	Statute	Level	Date
00 1	PC653M(B)-MISD-ANNOYING TELEPHONE CALL TO PLACE OF WORK	653M(B)	Misdemea nor	06/26/20 03
00 2	PC529(3)-FEL-PERSONATE TO MAKE OTHER LIABLE	529(3)	Felony	06/26/20 03
00 3	PC530.5-FEL-UNAUTHORIZED USE OF PERSONAL IDENTIFICATION	530.5	Felony	06/26/20 03

Disposition Events

01/13/2004 Plea

Judicial Officer

SUPERIOR COURT JUDGE, SAN MATEO COUNTY

00	PC653M(B)-MISD-ANNOYING TELEPHONE CALL TO PLACE OF	No Contest / Nolo
1	WORK	Contendere

10/27/2003 Plea

Judicial Officer

SUPERIOR COURT JUDGE, SAN MATEO COUNTY

002	PC529(3)-FEL-PERSONATE TO MAKE OTHER LIABLE	Not Guilty
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10/27/2003 Plea

Judicial Officer

SUPERIOR COURT JUDGE, SAN MATEO COUNTY

003	PC530.5-FEL-UNAUTHORIZED USE OF PERSONAL IDENTIFICATION	Not Guilty
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03/13/2006 Disposition

001	PC653M(B)-MISD-ANNOYING TELEPHONE CALL TO PLACE OF WORK	Dismissal: 1203.4
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01/13/2004 Disposition

002	PC529(3)-FEL-PERSONATE TO MAKE OTHER LIABLE	Dismissal: Negotiated Plea
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01/13/2004 Disposition

00	PC530.5-FEL-UNAUTHORIZED USE OF PERSONAL	Dismissal: Negotiated
3	IDENTIFICATION	Plea

Events and Hearings

- [09/19/2003 Conversion Event](#)
Comment
FDSAW: DECLARATION UNDER PENALTY OF PERJURY IN SUPPORT OF ARREST WARRANT, FILED.
- [09/19/2003 Conversion Event](#)
Comment
MISEN: FILE SENT TO JUDGE ELLIS

- [09/19/2003 Conversion Event](#)
Comment
OTHER: TO SIGN A/W
- [09/22/2003 Conversion Event](#)
Comment
MIRFL: FILE RETURNED TO CLERK'S OFFICE.
- [09/22/2003 Conversion Event](#)
Comment
AWAWA: ARREST WARRANT ISSUED TO RC ON 09/22/2003 . BAIL SET AT \$5,000.00 . WARRANT SIGNED BY ELLIS, H. JAMES .
- [09/23/2003 Conversion Event](#)
Comment
MISEN: FILE SENT TO JUDGE ELLIS
- [09/23/2003 Conversion Event](#)
Comment
OTHER: SENT MEMO TO JUDGE ELLIS REQUESTING THAT ARREST WARRANT BE RECALLED DUE TO D.A.'S ERROR IN ASKING FOR ARREST WARRANT RATHER THAN AN NTA.
- [09/25/2003 Conversion Event](#)
Comment
MIRFL: FILE RETURNED TO CLERK'S OFFICE.
- [09/25/2003 Conversion Event](#)
Comment
OTHER: PER JUDGE ELLIS,O.K. TO RECALL ARREST WARRANT.
- [09/25/2003 Conversion Event](#)
Comment
WWIRO: ARREST WARRANT ISSUED ON 09/22/2003 . RECALLED ON 09/25/2003 .
- [10/14/2003 Conversion Event](#)
Comment
SHNTC: NOTICE TO APPEAR SENT TO DEFENDANT ON 10/14/2003 TO APPEAR ON 10/27/2003 AT 9:00 A.M. IN SUPERIOR COURT SOUTHERN BRANCH DEPT. AR FOR MISDEMEANOR ARRAIGNMENT .
- [10/24/2003 Conversion Event](#)
Comment
SHRES: CASE SHIFTED FROM HEARING ON 10/27/2003 AT 9:00 A.M. IN DEPARTMENT AR OF SUPERIOR COURT SOUTHERN BRANCH TO HEARING ON 10/27/2003 AT 9:00 A.M. IN DEPARTMENT 32 OF SUPERIOR COURT SOUTHERN BRANCH .
- [10/27/2003 Conversion Event](#)

Comment

HHELD: HEARING HELD ON 10/27/03 AT 9:00 A.M. IN SUPERIOR COURT SOUTHERN BRANCH , D- 32 . HON. SUSAN GREENBERG, COURT COMMISSIONER , PRESIDING. CLERK: ROSA VEGA . REPORTER: BETTY GALIN . CLERK2: SARAI MORENO . DEPUTY D.A. FORD . DEFENSE COUNSEL PRESENT: PLISKA .

- [10/27/2003 Conversion Event](#)

Comment

HHMAR: MISDEMEANOR ARRAIGNMENT

- [10/27/2003 Conversion Event](#)

Comment

FDSPT: STIPULATION RE: JUDGE PRO TEMPORE HEARING MATTER.

- [10/27/2003 Conversion Event](#)

Comment

APAFD: DEFENDANT NOT PRESENT, BUT IS REPRESENTED BY ATTORNEY PLISKA .

- [10/27/2003 Conversion Event](#)

Comment

ARWVD: ARRAIGNMENT AND ADVICE OF RIGHTS WAIVED.

- [10/27/2003 Conversion Event](#)

Comment

PLCEA: DEFENDANT THROUGH HIS/HER COUNSEL ENTERS A PLEA OF NOT GUILTY TO ALL COUNTS.

- [10/27/2003 Conversion Event](#)

Comment

JTDEM: DEFENDANT DEMANDS TRIAL BY JURY.

- [10/27/2003 Conversion Event](#)

Comment

WTIMJ: TIME WAIVED FOR JURY TRIAL.

- [10/27/2003 Conversion Event](#)

Comment

SHOTA: CASE CONTINUED TO 12/30/2003 AT 8:30 A.M. IN REDWOOD CITY IN DEPT. PT FOR PRETRIAL CONFERENCE. .

- [10/27/2003 Conversion Event](#)

Comment

SHOTA: CASE CONTINUED TO 01/20/2004 AT 9:00 A.M. IN REDWOOD CITY IN DEPT. JT FOR JURY TRIAL. .

- [10/27/2003 Conversion Event](#)

Comment

MIENT: ENTERED BY S.MORENO ON 10/27/2003 .

- [10/31/2003 Conversion Event](#)
Comment
SHSET: APPEARANCE SET ON 11/05/2003 AT 9:00 A.M. IN SUPERIOR COURT SOUTHERN BRANCH DEPT. AR FOR TO SET AT REQUEST OF ATTORNEY .
- [11/04/2003 Conversion Event](#)
Comment
SHRES: CASE SHIFTED FROM HEARING ON 11/05/2003 AT 9:00 A.M. IN DEPARTMENT AR OF SUPERIOR COURT SOUTHERN BRANCH TO HEARING ON 11/05/2003 AT 9:00 A.M. IN DEPARTMENT 32 OF SUPERIOR COURT SOUTHERN BRANCH .
- [11/05/2003 Conversion Event](#)
Comment
HHELD: HEARING HELD ON 11/05/03 AT 9:00 A.M. IN SUPERIOR COURT SOUTHERN BRANCH , D- 32 . HON. SUSAN GREENBERG, COURT COMMISSIONER , PRESIDING. CLERK: ROSA VEGA . REPORTER: JENELL MULLANEL . CLERK2: MICHAEL BOLANDER . DEPUTY D.A. JOO . DEFENSE COUNSEL PRESENT: PLISKA .
- [11/05/2003 Conversion Event](#)
Comment
HHTOS: TO SET
- [11/05/2003 Conversion Event](#)
Comment
FDSPT: STIPULATION RE: JUDGE PRO TEMPORE HEARING MATTER.
- [11/05/2003 Conversion Event](#)
Comment
APAFD: DEFENDANT NOT PRESENT, BUT IS REPRESENTED BY ATTORNEY PLISKA .
- [11/05/2003 Conversion Event](#)
Comment
WTIMD: TIME CONTINUES TO BE WAIVED BY DEFENDANT/COUNSEL.
- [11/05/2003 Conversion Event](#)
Comment
SHOTA: CASE CONTINUED TO 01/06/2004 AT 8:30 A.M. IN REDWOOD CITY IN DEPT. PT FOR PRE-TRIAL CONFERENCE AND TO SET .
- [11/05/2003 Conversion Event](#)
Comment
SHOTA: CASE CONTINUED TO 01/13/2004 AT 9:00 A.M. IN REDWOOD CITY IN DEPT. AR FOR DISPOSITION AND TO SET .
- [11/05/2003 Conversion Event](#)

Comment

MIVJT: JURY TRIAL SET ON 01/20/2004 AT 9:00 A.M. ORDERED VACATED.

- [11/05/2003 Conversion Event](#)

Comment

MIVOT: PRETRIAL CONFERENCE. SET ON 12/30/2003 AT 8:30 A.M. ORDERED VACATED.

- [11/05/2003 Conversion Event](#)

Comment

MIENT: ENTERED BY MBOLANDER ON 11/05/2003 .

- [01/05/2004 Conversion Event](#)

Comment

SHRES: CASE SHIFTED FROM HEARING ON 01/06/2004 AT 8:30 A.M. IN DEPARTMENT PT OF SUPERIOR COURT SOUTHERN BRANCH TO HEARING ON 01/06/2004 AT 8:30 A.M. IN DEPARTMENT 29 OF SUPERIOR COURT SOUTHERN BRANCH .

- [01/06/2004 Conversion Event](#)

Comment

HHELD: HEARING HELD ON 01/06/04 AT 8:30 A.M. IN SUPERIOR COURT SOUTHERN BRANCH , D- 29 . HON. JOSEPH N GRUBER, COURT COMMISSIONER , PRESIDING. CLERK: SARAI MORENO . REPORTER: TRACY WOOD . CLERK₂: LISABETH FALLS . DEPUTY D.A. FEASEL . DEFENSE COUNSEL PRESENT: PLISKA .

- [01/06/2004 Conversion Event](#)

Comment

HHPTE: PRE TRIAL CONFERENCE AND TO SET

- [01/06/2004 Conversion Event](#)

Comment

FDSPT: STIPULATION RE: JUDGE PRO TEMPORE HEARING MATTER.

- [01/06/2004 Conversion Event](#)

Comment

APWAT: DEFENDANT APPEARED WITH ATTORNEY PLISKA .

- [01/06/2004 Conversion Event](#)

Comment

APNAD: NEITHER ATTORNEY NOR DEFENDANT PRESENT WHEN MATTER HEARD ON THE RECORD.

- [01/06/2004 Conversion Event](#)

Comment

SHPDS: PREVIOUS DATES REMAIN AS SET.

- [01/06/2004 Conversion Event](#)

Comment

MIENT: ENTERED BY L FALLS ON 01/06/2004 .

- [01/12/2004 Conversion Event](#)

Comment

SHRES: CASE SHIFTED FROM HEARING ON 01/13/2004 AT 9:00 A.M. IN DEPARTMENT AR OF SUPERIOR COURT SOUTHERN BRANCH TO HEARING ON 01/13/2004 AT 9:00 A.M. IN DEPARTMENT 31 OF SUPERIOR COURT SOUTHERN BRANCH .

- [01/13/2004 Conversion Event](#)

Comment

HHELD: HEARING HELD ON 01/13/04 AT 9:00 A.M. IN SUPERIOR COURT SOUTHERN BRANCH , D- 31 . HON. CLARK LESLIE, COURT COMMISSIONER , PRESIDING. CLERK: IRMA LOPEZ-OCEGUEDA . REPORTER: RHONDA GUESS . CLERK2: LISABETH FALLS . DEPUTY D.A. FORD . DEFENSE COUNSEL PRESENT: PLISKA .

- [01/13/2004 Conversion Event](#)

Comment

HHDOS: DISPOSITION AND TO SET

- [01/13/2004 Conversion Event](#)

Comment

FDSPT: STIPULATION RE: JUDGE PRO TEMPORE HEARING MATTER.

- [01/13/2004 Conversion Event](#)

Comment

APAFD: DEFENDANT NOT PRESENT, BUT IS REPRESENTED BY ATTORNEY PLISKA .

- [01/13/2004 Conversion Event](#)

Comment

PLCEF: DEFENDANT THROUGH HIS/HER COUNSEL ENTERS A PLEA OF NOLO CONTENDERE TO COUNT 1 . DEFENDANT FOUND GUILTY BY COURT.

- [01/13/2004 Conversion Event](#)

Comment

FDWOR: DEFENDANT IS ADVISED OF, UNDERSTANDS, AND KNOWINGLY AND VOLUNTARILY WAIVES ALL THE FOLLOWING RIGHTS: WAIVES THE RIGHT TO COUNSEL; TO TRIAL BY JURY; TO CONFRONT AND CROSS-EXAMINE ADVERSE WITNESSES; THE PRIVILEGE AGAINST SELF-INCRIMINATION. THE COURT FINDS THAT THE DEFENDANT UNDERSTANDS THE NATURE OF THE CHARGES, THE ELEMENTS OF THE OFFENSE, THE DEFENSE THERETO, THE CONSEQUENCES OF PLEAS AND THE RANGE OF PENALTIES THERETO. WAIVER OF RIGHTS SIGNED.

- [01/13/2004 Conversion Event](#)
 Comment
 CDFRC: UPON MOTION OF PEOPLE ALL REMAINING COUNTS DISMISSED.
 REASON: NEGOTIATED PLEA.
- [01/13/2004 Conversion Event](#)
 Comment
 WTSTB: TIME WAIVED FOR SENTENCING.
- [01/13/2004 Conversion Event](#)
 Comment
 ARWFS: DEFENDANT WAIVES FORMAL ARRAIGNMENT FOR SENTENCING.
- [01/13/2004 Conversion Event](#)
 Comment
 SESCOB: COUNT 1 IMPOSITION OF SENTENCE SUSPENDED. DEFENDANT IS
 PLACED ON COURT PROBATION FOR 2 YEARS; 0 MONTHS; 0 DAYS.
- [01/13/2004 Conversion Event](#)
 Comment
 SECJL: AS TO COUNT 1 , DEFENDANT TO SERVE 0 YEAR(S), 0 MONTH(S), 2
 DAY(S), 0 HOUR(S) IN THE COUNTY JAIL.
- [01/13/2004 Conversion Event](#)
 Comment
 SESEJ: DEFENDANT TO SURRENDER TO COUNTY JAIL ON 02/28/2004 AT
 10:00 A.M. .
- [01/13/2004 Conversion Event](#)
 Comment
 SESWP: DEFENDANT IS RECOMMENDED TO THE SHERIFF'S WORK
 PROGRAM.
- [01/13/2004 Conversion Event](#)
 Comment
 SEPFX: TOTAL FINE AMOUNT PAYABLE, INCLUDING ALL ASSESSMENTS, IS
 \$1,230.00 .
- [01/13/2004 Conversion Event](#)
 Comment
 SERET: DEFENDANT ORDERED TO PAY \$110.00 TO STATE RESTITUTION
 FUND. THIS PAYMENT IS A CONDITION OF PROBATION
- [01/13/2004 Conversion Event](#)
 Comment
 SEPRC: DEFENDANT TO PAY FINE AND ASSESSMENTS THROUGH
 MUNICIPAL COURT CLERK'S OFFICE.
- [01/13/2004 Conversion Event](#)

Comment

SEOAL: OBEY ALL LAWS. FOLLOW ALL ORDERS OF THE COURT/PROBATION OFFICER AND REPORT AS DIRECTED. NOTIFY THE COURT/ PROBATION OFFICER IMMEDIATELY OF ANY CHANGE OF RESIDENCE ADDRESS.

- [01/13/2004 Conversion Event](#)

Comment

SENOG: DEFENDANT NOT TO CONTACT, CALL OR OTHERWISE COMMUNICATE WITH VICTIM .

- [01/13/2004 Conversion Event](#)

Comment

MIATS: ATTORNEY MAY SIGN.

- [01/13/2004 Conversion Event](#)

Comment

MIASE: ALL SENTENCE ELEMENTS FOR THIS PROCEEDING ENTERED.

- [01/13/2004 Conversion Event](#)

Comment

MIENT: ENTERED BY L FALLS ON 01/13/2004 .

- [01/30/2004 Conversion Event](#)

Comment

SEFCN: FINE PAID THROUGH CLERK'S OFFICE ON 01/30/2004 . RECEIPT NUMBER 41-0005 . AMOUNT PAID \$1,230.00 .

- [01/30/2004 Conversion Event](#)

Comment

SEFCR: \$110.00 RESTITUTION FUND PAID THROUGH THE CLERKS OFFICE.

- [02/11/2004 Conversion Event](#)

Comment

HHMOD: MODIFICATION OF SENTENCE

- [02/11/2004 Conversion Event](#)

Comment

SECSB: DEFENDANT ORDERED TO COMPLETE 50 HOURS OF PUBLIC SERVICE WORK ON OR BEFORE 08/11/2004 AS DIRECTED BY THE PUBLIC SERVICE REPRESENTATIVE.

- [02/11/2004 Conversion Event](#)

Comment

SEPSA: SUBMIT PROOF OF COMPLETION OF PUBLIC SERVICE WORK TO THE COURT BY 08/11/2004 .

- [02/11/2004 Conversion Event](#)

Comment

MIENT: ENTERED BY IRMA ON 02/11/2004 .

- [04/21/2004 Conversion Event](#)

Comment

CERTC: CERTIFIED COPY OF DOCUMENTS SENT TO DEPARTMENT OF REAL ESTATE . \$0.00 FEE PAID.

- [07/27/2004 Conversion Event](#)

Comment

MISEN: FILE SENT TO DEPT 29

- [08/04/2004 Conversion Event](#)

Comment

SHSET: APPEARANCE SET ON 08/10/2004 AT 9:00 A.M. IN SUPERIOR COURT SOUTHERN BRANCH DEPT. 29 FOR FURTHER PROCEEDINGS. AT REQUEST OF ATTY PLISKA .

- [08/10/2004 Conversion Event](#)

Comment

HHELD: HEARING HELD ON 08/10/04 AT 9:00 A.M. IN SUPERIOR COURT SOUTHERN BRANCH , D- 29 . HON. JOSEPH N GRUBER, COURT COMMISSIONER , PRESIDING. CLERK: ROSA VEGA . REPORTER: TRACY WOOD . CLERK2: BIANCA NEDELUCU . DEPUTY D.A. BAUM . DEFENSE COUNSEL PRESENT: PLISKA .

- [08/10/2004 Conversion Event](#)

Comment

HHFUR: FURTHER PROCEEDINGS

- [08/10/2004 Conversion Event](#)

Comment

FDSPT: STIPULATION RE: JUDGE PRO TEMPORE HEARING MATTER.

- [08/10/2004 Conversion Event](#)

Comment

APWAT: DEFENDANT APPEARED WITH ATTORNEY PLISKA .

- [08/10/2004 Conversion Event](#)

Comment

PROBE: PROBATION IS MODIFIED.

- [08/10/2004 Conversion Event](#)

Comment

SEOTH: PUBLIC SHERRIF'S WORK SEEMED COMPLETED .

- [08/10/2004 Conversion Event](#)

Comment

MIASE: ALL SENTENCE ELEMENTS FOR THIS PROCEEDING ENTERED.

- [08/10/2004 Conversion Event](#)

Comment

MIENT: ENTERED BY B NEDELUCU ON 08/10/2004 .

- [03/10/2006 Conversion Event](#)

Comment

OTHER: EXPUNGEMENT FEE OF \$60.00 PAID. RECEIPT #41-0013

- 03/13/2006 Conversion Event

Comment

MIRFL: FILE RETURNED TO CLERK'S OFFICE.

- 03/13/2006 Conversion Event

Comment

FDPDC: PETITION TO DISMISS COUNT 1 PURSUANT TO SECTION 1203.4/1203.4A PENAL CODE FILED.

- 03/13/2006 Conversion Event

Comment

FDCOM: ORDER GRANTING AND DISMISSING COUNT 1 PURSUANT TO SECTION 1203.4/1203.4A PENAL CODE, FILED.

- 03/13/2006 Conversion Event

Comment

FDACI: AMENDED CII FORWARDED TO ARRESTING AGENCY.

Exhibit B

when will you be a force for positive change?

SPEAKING FOR MYSELF TO DEFUSE MISINFORMATION

👍👎 3

K Kim James, Oak Valley · 13 hr ago

I've been following this post since we have a few knowledgeable people giving "facts" and others with more "facts" but too much arguing about whose "facts" are true. I attend or... See more

Thank Reply 🙄 3

W William Mo, Monta Vista South · 13 hr ago

Ian Greensides so... I asked Ray: "I donated \$100, please tell me how much you donated during the last campaign?" Ray said "I believe I didn't make any donations in the last... See more

Thank Reply 🙄👎 2

I Ian Greensides, North Blaney · 13 hr ago

R Wang You plead no contest to sending revenge porn. The record was later expunged after you completed your sentence of community service and paid restitution in the form of attorney's fees, and a certain amount of time passed.

Your threats against Richard Mehlinger are well documented from your social media posts.

Your most recent response reflects the need for you to be removed as chair of the planning commission. We need to be able to trust public officials . . .

Mon Aug 26 11:05:33

https://nextdoor.com/news_feed/

Search Nextdoor

Thank Reply 😊 1

R Wang, Rancho Rinconada · 11 hr ago

Ian Greensides if you keep slandering here about the facts then how can anyone have a real debate with you.

There is no revenge porn. My network was hacked and the individual was signed up to porn sites. How can you send someone porn when you don't even have their email address? Stop lying here.

The no contest plea was for a phone call to inform the individual I was hacked but they chose to sue instead of having a conversation. There are no criminal convictions at all and I'm proud of defending the public health rights against big developer interests.

To twist public facts and to fabricate misleading stories is not a crime but it speaks to your character.

I don't mind you asking me to step down. That's your right. But you are the one with massive character issues.

SPEAKING FOR MYSELF TO DEFUSE MISINFORMATION

👤 1

Browser window showing a Nextdoor news feed post. The browser address bar displays https://nextdoor.com/news_feed/. The page header includes a search bar labeled "Search Nextdoor" and navigation icons for notifications, messages, and profile. The post is from Ian Greensides, North Blaney, edited 11 hours ago, and is titled "R Wang".

I went back and looked at the San José Spotlight article – it appears that you plead no-contest in two cases: one for the revenge porn, and one for making harassing phone calls to someone at work.

It is disturbing that you continue to falsely claim that a developer hacked your computer. You are a public official - wow . . .

Here is a link to the article and some excerpts:

<https://sanjosespotlight.com/cupertino-policymaker-in-hot-water-for-past-sexual-harassment-lawsuit/>

Browser tabs: 黃曆查詢 - 算命 X PROPOSAL FOI X Refresh 19 Las X News Feed - N X Vakman Khalifin X Christina Farr / X

Address bar: https://nextdoor.com/news_feed/

Search bar: Search Nextdoor

Post by Ian Greensides, North Blaney · Edited 6 min ago New

@Ray - I'm not sure of the difference between revenge porn and signing someone up for porn sites. Maybe you could explain. I don't have experience in either one of them. I'm not sure that this knowledge is something our residents are seeking in their public officials.

I reviewed the San Mateo County online docket. It confirms what was reported in the press.

Your explanations of what happened continues to get more creative. Dark arts? Did they also put a hex on you? Maybe at the next planning commission meeting you can schedule an exorcism. You're the chair, I'm sure you can get it on the agenda.

It doesn't seem like a stretch . . . You already talked for hours at the planning commission about how to try and undo the SB35 approval . . .

I also noticed that you legally changed your name from Ray to R after the conviction. Curious as to why? Kinda like a stage name? I'm seriously interested

Thank Reply 😊 1