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OF COUNSEL
JAMES M. FORGOTSON, III

February 24, 2015

Healthy Habitats, LLC
c/o Carl Grimes
1811 S. Quebec Way
Apt. # 99
Denver, CO 80231

Re: Notice to Cease and Desist Internet Defamation

Dear Mr. Grimes:

Please be advised that our firm has been retained by HiTech Air Solutions to investigate and take legal action against you for the series of unwarranted and defamatory attacks against it made by you and your company.

HiTech Air Solutions is a reputable company that has provided—and continues to provide—consumers with the opportunity to eradicate mold and toxins in their indoor environments via the use of HiTech's machines. Our client provides its consumers with access to its products via direct sales and Internet marketing. HiTech has established a well-founded reputation for the quality of its services and customer satisfaction. Many of our client's sales have been generated via online social networks, such as the Facebook group, Toxic Mold: Rediscovering Health and Wellness, one that you actively participate in. Your unwarranted actions and baseless accusations have damaged that reputation and adversely affected our client's business.

You have personally posted many willfully false and misleading comments about our client and Hi Tech sales representatives. Examples of your defamatory statements include:

1. "Ray doesn't understand hydroxyls or how they work"—You informed a potential buyer that HiTech has no understanding of hydroxyls.
2. "[T]he explanations as to why [HiTech's machines work] and the testing to prove it are neither relevant, nor valid, nor sufficient for proof."—You published on Facebook this unwarranted attempt to state that HiTech does not conduct "valid" tests. A claim that you cannot back up, yet, certainly caused harm to HiTech's reputation.

ALL MAIL AND FAX REPLY TO

OKLAHOMA CITY

1230 SW 89th, Suite A
Oklahoma City OK 73139

PHONE: 405.703.4567
FACSIMILE: 405.703.4061



CLAREMORE

418 West Fourth Street
Claremore OK 74017

PHONE: 918.342.4357
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3. "[The science behind HiTech's machines] can't be proven scientifically or objectively in the way some hope and some require."—Another attempt of yours to undermine the science behind HiTech's machines.
4. "But there is strong information by credible people—assuming they don't have a financial interest in selling them—that they dramatically help some people in some situations." Yet another attempt of yours to create inferences that undermine the credibility of HiTech's testimonials.
5. "My suggestion is to focus on experienced results with methods others have tried while avoiding ones factually known to be harmful. Use simple methods not high tech." Although you attempted to recant your use of the words "high tech" as meaning "HiTech," the damage was already done. Any reasonable person would read this to mean that "HiTech" is "factually known to be harmful."
6. "Deception and misleading—even if unintentional and for good intention—is never good."—You imply that our client is deceiving and misleading.
7. "Rather, to caution against claims that can't be personally verified. Verified for your—even if you are the only person in the world for whom it works—or doesn't work."—Yet again, another attempt of yours to undermine the personal testimony of HiTech's success.
8. "If the hydroxyl molecule it generates reacts to mold and chemicals and allergens, etc, how do they tell the difference between them and your body? They don't have a brain. They react with everything they come into contact . . . Not saying any of the above is what is happening. But I am saying to take care of yourself if you need to."—An attempt at creating fear in one of HiTech's consumers.
9. The accusations you made against HiTech concerning RTL not testing HiTech's products.
10. The private message you sent a buyer of HiTech's product stating that HiTech is a scam and that she should return the product.

The above statements made in reference to HiTech are utterly false and without merit, and they are defamation *per se* in that they depict our client as engaging in fraudulent activity that violates civil and criminal law. Under Colorado, Oklahoma, and federal law, you risk serious financial exposure for each and every one of the defamatory remarks made. In addition to the defamation claims, you will also be pursued and held liable for tortious interference with HiTech's ability to contract. HiTech has made genuine sales to consumers that are excited about their purchase so much that they post on Facebook about it. You have private messaged these individuals and attempted to persuade them to return the items.

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403 West First Street, Ste. 100
Claremore OK 74017

PHONE: 918.283.4441
FACSIMILE: 918.283.4442

Your attempts to spread libelous and defamatory material about our client have caused serious and irreparable injury to it, its reputation, and its business. Our client will not stand by and allow this misconduct to continue.

We hereby demand that you:

1. Immediately remove from the Facebook page any and all defamatory and disparaging remarks regarding our client made by you and on behalf of your company,
2. Immediately cease and desist in publishing (oral or written) defamatory statements about our client, whether the statements are made by you, your company, or third parties you encourage,
3. Immediately apologize for and recant your statements on the Facebook group where you made the statements concerning HiTech,
 - a. Your apology must substantially conform to the following:
 - i. "I have made a mistake. Over the past few months, I have let my business interest and ego get in the way of what is actually good for each of you. As you can probably tell, I have recommended to nearly everyone on this forum that you refrain from purchasing HiTech's products. My recommendations have been made in haste. From all appearances, HiTech appears to be a reputable company that has truly helped many. My initial skepticism turned into a vendetta where I began interfering with their sales. I made false statements just to get some of you to return their products. Again, I have made a mistake and I am sorry to each of you. Above all, I am sorry to HiTech and all those affiliated with them."
4. Refrain from ever communicating about HiTech's products ever again, and
5. Compensate our client for its incurred attorney fees and costs.
 - a. Our client will accept a check in the amount of four-hundred dollars (\$400).
 - b. Please make it out to Laird Hammons Laird and mail it to 1230 SW 89th Ave, Suite A, Oklahoma City, OK 73139.

Please note that this law firm does not attempt to restrict legitimate free speech, and we believe that the Internet is an important medium for dissemination of **accurate and truthful** information and for fair comment on issues of interest. Your activities, however, unlawfully encroach upon our client's rights.

This letter puts you on notice that should you refuse to comply with our demands by March 1, 2015, we will have no choice but to recommend that our client pursue all legal causes of action, including

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the filing of a lawsuit, to protect its interests. We will pursue both damages and attorneys' fees and costs incurred by our client as a result of your actions.

This is a very serious matter that requires your immediate attention. We, therefore, strongly recommend that you follow through with our client's demands to resolve this situation. This letter is your one and only chance to resolve this matter amicably.

Yours truly,

LAIRD, HAMMONS, LAIRD, PLLC



CHRIS HAMMONS

Attorney at Law

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