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April 11, 2012

VIA CERTIFIED MAIL # _____
RETURN RECEIPT REQUESTED

Bill Baker
456C Yacht Club Dr.
Rockwall, Texas 75032

NOTICE TO CEASE AND DESIST
FALSE AND DEFAMATORY STATEMENTS

Dear Mr. Baker:

Please be advised that our firm been retained by In-Sync Exotics Wildlife Rescue ("In-Sync") to investigate and take legal action against you for the series of false and defamatory attacks made by you, as further described below. You are hereby warned and notified to **CEASE AND DESIST** making any false or defamatory statements about In-Sync.

As you know, In-Sync is a non-profit organization that has been rescuing neglected, abused, and unwanted exotic cats since March 2000. Over the years, In-Sync has established a well-founded reputation in the exotic animal community for providing excellent and safe care for its exotic cats. Your unwarranted actions and false statements about In-Sync appear to be intended to damage that reputation and adversely affect In-Sync's operations.

You were employed by In-Sync as a curator from approximately April 2010 through December 2010. Your pet cougar, Phoenix, was temporarily housed at In-Sync's facility from approximately March 2010 until late July 2011, at which time Phoenix was

moved to an exotic animal facility in Kansas. Shortly after Phoenix was moved out of In-Sync's facility, you and your girlfriend, Carolann Garwood, began a campaign against In-Sync that included defamatory internet postings, false reports to government agencies, and other harassment designed to harm the organization.

In approximately September 2011, you and Ms. Garwood created a Facebook profile using the pseudonym "Veronica Cheveyo" for the purpose of damaging the reputation of In-Sync. Since that time, you have used said Facebook profile to post many willfully false and misleading statements about In-Sync on various Facebook group pages-- including "Stop Private Ownership of Exotic Cats," "Intelligent Solutions for the Exotic Animals," and "Discussions to Benefit Exotic Animals." These Facebook groups are frequented by donors, employees, and operators of exotic animal sanctuaries all over the world, and your false and defamatory comments appear deliberately designed to harm In-Sync's reputation within that community.

The following are examples of some of your false and misleading Facebook posts regarding In-Sync:

- You repeatedly state that In-Sync is financially unstable and may not be able to remain in operation, causing animals to be relocated or euthanized.
- You state that In-Sync's "infrastructure does not meet local, state or federal codes and regulations that relate to both animal welfare or public safety."
- You state that In-Sync's "facility is not compliant with many agencies such as OSHA, EPA, and other federal agencies," and repeatedly make other untrue statements regarding In-Sync's compliance with safety laws and standards.
- You wrongfully accuse In-Sync of illegally dumping biologically hazardous waste.
- You falsely accuse In-Sync of subjecting visitors, volunteers, staff, interns, and the surrounding community to zoonotic diseases.
- You state that In-Sync employees "lack expertise in proper animal management and husbandry."

The above statements are each utterly false and without merit, and many of them constitute defamation *per se* to the extent that they harm In-Sync's trade or profession or allege activity that violates civil and criminal law. You have continued to post such statements after being asked to stop by the operators of In-Sync, which further demonstrates your malicious intent. While we do not attempt to restrict legitimate speech on the internet or elsewhere, your activities described above are not within the bounds of the law and encroach upon In-Sync's legal rights.

In addition, you have made false statements against In-Sync to various federal and state government agencies—including the United States Department of Agriculture

(USDA), the Texas Commission on Environmental Quality (TCEQ), and Collin County authorities. For example, in or around September 2011, you filed an animal welfare complaint with the USDA. The USDA complaint contained false statements including, among others, (a) that some of the large cats at In-Sync had Toxoplasmosis, (b) that water ditches at In-Sync's facility were contaminated, and (c) that In-Sync's facility lacked perimeter fencing to keep animals from escaping. A USDA officer came to In-Sync's facility to investigate your complaints, and found each of your allegations to be false. You should be aware that Title 18, United States Code, Section 1001 makes it a crime to knowingly and willfully make a false or fraudulent statement to a government agency.

Your attempts to spread false and defamatory statements appear intended to cause our client serious and irreparable injury to its reputation and its ability to receive the charitable donations upon which it relies. Additionally, your false statements to government agencies have wasted the time and resources of both In-Sync and the general public. We will not stand by and allow this inappropriate and unlawful conduct to continue.

We hereby demand that you:

1. Immediately remove any and all false, misleading, defamatory, and disparaging remarks regarding In-Sync made by you on Facebook or any other internet website, and
2. Immediately cease and desist in publishing or causing to be published any false, misleading, defamatory, and disparaging remarks regarding In-Sync on any forum whatsoever, and
3. Immediately cease and desist in making any false or misleading complaints or statements to government entities regarding In-Sync.

If you do not comply with these demands, we will have no choice but to recommend that our client pursue all legal actions to protect its interests. While we certainly hope that it is not necessary, we are prepared to pursue any actions necessary to stop your harassing and defamatory conduct against In-Sync, including the filing of a lawsuit seeking damages, attorney fees, and costs. We strongly suggest that you or your attorney contact us immediately to resolve this situation amicably.

Sincerely,

BLANSCKET HOOPER & HALE, L.L.P.

Robert C. Ruhlin

