



BURCH & CRACCHIOLO

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June 3, 2014

**SENT VIA EMAIL: Michael.Chichester@me.com**

**AND SENT VIA U.S. MAIL:**

Mike Chichester  
5443 Greenbriar Drive  
Glendale, AZ 85308

*Re: Notice of Tortious Interference and Demand to Cease and Desist*

Dear Mr. Chichester:

This Firm represents Santy Integrated and it has been discovered that you recently began improperly publishing false and defamatory statements about Santy and its internship program. Even more egregious is the fact that you also directly contacted Santy's clients in an attempt to spread the nonsense you've artificially manufactured. Clearly your wrongful conduct is an attempt to impugn Santy's reputation and tortiously interfere with Santy's client relationships. Your actions were, without question, done on your own behalf and on behalf of your employer, Zooka Creative. Therefore, you have personal liability for your actions and your employer has liability for your actions as well.

**DEMAND IS MADE UPON YOU IMMEDIATELY CEASE AND DESIST PUBLISHING ANY DEFAMATORY STATEMENTS AND TO DISCONTINUE CONTACTING ANY CLIENT OF SANTY'S IN ORDER TO INTERFERE WITH ITS BUSINESS RELATIONSHIPS.**

**LEGAL ACTION AGAINST YOU AND ZOOKA CREATIVE**

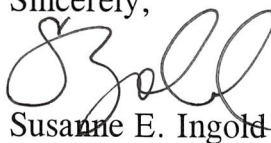
As stated, demand is made upon you personally, and as an agent of Zooka Creative, to immediately cease and desist any continued contact with Santy's clients either by direct contact, social media postings, email or other communication. Demand is also made upon you to cease and desist publishing any further defamatory statements regarding Santy. The intentional and direct acts committed by you, with your employer's knowledge and approval, are intended to wrongfully interfere with Santy's client relationships and thus give rise to civil claims against you and Zooka Creative. Your employer has already been Since you are committing these tortious acts on behalf of Zooka with its tacit and/or express approval and consent, liability for such conduct is against you and your company as well. Where the company knows about the unlawful conduct and takes no actions to prevent it, it becomes a party subject to liability and liable

Mike Chichester  
June 3, 2014  
Page | 2

for punitive damages where the acts are willful, wanton and in reckless disregard of Santy's rights. Security Title Agency, Inc. v. Pope, 219 Ariz. 480, 200 P.3d 977, 997 (Ct. App. 2008)(citing American Republic Ins. Co. v. Union Fidelity Life Ins. Co., 470 F.2d 820 (9<sup>th</sup> Cir.1972)).

Should you fail to comply with this demand, then Santy will seek all available legal remedies against you and Zooka, including injunctive relief and award of monetary damages, and it will also seek an aware of the attorneys' fees necessary to protect Santy, its reputation and its clients. This letter may be the last notice you receive before a lawsuit is filed. Please guide yourself accordingly. Thank you.

Sincerely,



Susanne E. Ingold  
For the Firm

SEI/mrm

