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December 29, 2016

Mr. Steffen [REDACTED]
[REDACTED]

Via e-mail: [REDACTED]

Via CM # 70122920000113485650

Via 1st class U.S. mail

Re: i-Geniuses.com

NOTICE OF CLAIM & DEMAND FOR RETRACTION


Dear Mr. [REDACTED]

Please be on notice that I represent i-Geniuses.com, successor-in-interest to The Mac Geniuses, but with different ownership and management. I have seen the Yelp review that was initially posted in 2013 and updated during this month of December, 2016. When you placed an order with The Mac Geniuses, you agreed with their Terms of Service. Section 4 of the Terms of Service contains your agreement not to attack/criticize/disparage/defame The Mac Geniuses or any of its employees, associates or partners publicly, such as on public forums, blogs, social networks, etc.

Your public reviews on Yelp constitute a breach of contract, as you agreed in advance to use a customer dispute resolution process, in a good faith effort to resolve any complaints, and if that did not result to your satisfaction, then the parties would submit to binding arbitration.

You have published false and defamatory comments on the Internet such as "...this place is a total scam...this company scavenges parts from all the laptops that are sent in to be fixed...Stay away from this company." These comments are unwarranted attacks on i-Geniuses.com's reputation as an ongoing business concern that have been published as a statement of fact. The statements are defamatory, false, and were made in reckless disregard for the truth. Injury is presumed under Texas law since the statements have been made about i-Geniuses.com's business interests and reputation.

The above-described conduct is actionable under Texas law as libel and business disparagement. Demand is hereby made upon you to instruct Yelp to remove the negative reviews from its web site entirely no later than January 9, 2017. Should you fail and refuse to do so, a civil lawsuit will be filed against in Harris County, Texas you to compel same, in which event my client will also seek recovery of monetary damages.

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Should you wish to discuss this matter, please feel free to contact me. Thank you in advance for your prompt attention to this matter.

Very truly yours,

/s/ Chris Cammack

Christopher M. Cammack

CMC/fh
xc: i-Geniuses.com