

On Mar 15, 2023, at 2:30 PM, Eric Sussman
<els@weinsteinwisser.com> wrote:

Dear Mr. Kidwell-Ross,

This office represents Northeast Landscaping & Tree Services, Inc. ("NELTS"). It has come to the attention of NELTS that you have been publicly disseminating false and defamatory statements regarding NELTS and interfering with the business contracts and business expectancies NELTS has with its customers and the general business community. I write on behalf of NELTS to demand that you, on behalf of yourself and [worldsweeper.com](https://www.worldsweeper.com), cease and desist such communications immediately.

Specifically, we understand that you have circulated an article, a copy of which is attached, in which you falsely claim that NELTS's CEO, Anthony Portunato, has failed to "pay[] unemployment compensation on his employees," that "many" NELTS employees were "erroneously classified as salaried so [Mr. Portunato] could keep from paying overtime," that NELTS was "not actually using sweepers when the company cleaned Home Depot lots in Connecticut" but instead "had people just show up to hand-pick into buckets," that Mr. Portunato "instructed employees (and some contractors) to go find large debris such as couches and the like, transport them onto the Home Depot lot, take photos, remove, take photos, bill for removal" and that "photos were routinely Photoshopped to show debris, then another photo to show the debris was gone." While you purport to attribute the foregoing allegations to an unidentified former NELTS employee, your failure to conduct any investigation whatsoever into the veracity of these false allegations demonstrates your **reckless disregard for the truth**.

We further understand that you have circulated an additional written communication in which you falsely contend that NELTS has a "shoddy reputation." A copy of that communication is also attached.

Your statements are false, defamatory and malicious, and meet the definition of libel per se under Connecticut law. Additionally, in claims

for libel per se, or pursuant to which a retraction letter is not issued as demanded herein, NELTS would also be entitled to expenses of litigation, including reasonable attorney's fees in prosecuting such a claim, together with general damages.

Pursuant to Connecticut General Statutes §52-237 this letter is being sent to you as a **DEMAND** that you retract the defamatory statements you made about NELTS in as public a manner as that in which those statements were made, and within a reasonable period of time. In particular, NELTS demands that you publicly retract your false statements that NELTS's CEO, Anthony Portunato, has failed to "pay[] unemployment compensation on his employees," that "many" NELTS employees were "erroneously classified as salaried so [Mr. Portunato] could keep from paying overtime," that NELTS was "not actually using sweepers when the company cleaned Home Depot lots in Connecticut" but instead "had people just show up to hand-pick into buckets," that Mr. Portunato "instructed employees (and some contractors) to go find large debris such as couches and the like, transport them onto the Home Depot lot, take photos, remove, take photos, bill for removal," that "photos were routinely Photoshopped to show debris, then another photo to show the debris was gone" and that NELTS has a "shoddy reputation." NELTS further demands that you admit in your retraction that you have no evidence to support these false statements. Anything short of this type of retraction will be deemed improper pursuant to the above-referenced statute.

NELTS further demands that you immediately provide a copy of the "link to the NELTS investigation" and "recent audio interview" referenced in the second attachment to this e-mail, which you claim to have provided to Home Depot. Please send the link and copy of the audio interview to my attention.

You will be provided with a period of ten (10) days, up to and including March 25, 2023, in which to issue the retraction demanded herein, as that represents a reasonable period of time for you to do so, and to send confirmation and a copy of such retractions to me via e-mail at els@weinsteinwisser.com. If you fail to issue said retraction, NELTS will pursue available legal remedies against you in Connecticut without

further notice. This will be your only warning. NELTS hereby otherwise reserves its right to pursue legal recourse against you and worldsweeper.com for your illegal acts.

I await your response.

Eric L. Sussman, Esq.

Weinstein & Wisser, P.C.

29 South Main St., Ste 207

West Hartford CT 06107

Office: (860) 561-2628

Email: els@weinsteinwisser.com