

**Flanagan  
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**CEASE AND DESIST DEMAND**  
**DEMAND FOR IMMEDIATE REMOVAL OF**  
**DEFAMATORY MATERIAL**

**Of Counsel**

Thomas Angelo, III  
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C. David Ewing\*  
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**Retired**

Emerson R. Keck

Patrick A. Flanagan  
(1938 - 2020)

James E. Swaim  
(1945 - 2014)

Laura I. Hoffman  
(1933 - 2019)

\* Licensed in KY  
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‡ Also licensed in WV

August 26, 2021

David Esrati  
100 Bonner  
Dayton, Ohio 45410

RE: Wilderness Agency, Richard Kaiser & John Theobald

Mr. Esrati:

Our firm, Flanagan, Lieberman, Hoffman & Swaim has been retained by Lion Creative Studios, DBA Wilderness Agency in reference to several defamatory publications authored and posted by you, Mr. Esrati, on the website [www.esrati.com](http://www.esrati.com). You posted on August 22, 2021, entitled "witch hunt justice in Dayton" you stated that "Wilderness is a revolving door of contract violations," and made allegations of fraud. You posted on May 31, 2020, entitled "Apparently it's rude to ask the FBI to do their job" you state, in reference to Mr. Theobald, Mr. Kaiser, and the Wilderness Agency, "a firm run by a drunk." You posted on March 15, 2020, entitled "When the wrong answer and no response spells corruption and coverup" in which you state numerous misstatements, misinterpretations and malicious allegations against Mr. Kaiser, Mr. Theobald and the Wilderness Agency. It is obvious that your statements were malicious and made with the very intention of damaging our client's reputation and to tortiously interfere with our client's business relations. Because of your actions our client's reputation has been damaged and their business relations have become strained. Accordingly, you are directed to:

**CEASE AND DESIST ALL DEFAMATORY STATEMENTS  
AND REMOVE THE LIBEL MATERIAL  
AND REMOVE THE POST AND REFERENCES TO KAISER, THEOBALD  
AND WILDERNESS AGENCY**

The act of publishing false and defamatory statements about another person or entity is actionable in Ohio, Ohio Revised Code 2739.01, and the tortious interference of business relations. As our client assess the damages caused by your actions, you are hereby directed to immediately cease and desist all defamatory statements against our client. This includes removing the defamatory post from all social media within your control immediately and causing the post to be removed from any internet sites under your control.

If you fail to cease and desist any future defamatory statements, or fail to remove the postS about Wilderness, or fail to remove the post from any internet sites under your control immediately we will take appropriate actions.

A person who is found liable of defamation may be liable for the damages, tortious interference, and attorney fees if an action is brought.

Signed,



Andrew R Barnes

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