LAW OFFICE

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January 19, 2023

VIA EMAIL AND FEDEX

Re: Samuel J. Mangel vs Michael Santos, Carole Santos, Justin M. Papery, Prison Professors Charitable Corporation, Earning Freedom Charitable Corporation, Earning Freedom Corporation and Etika, LLC

Dear Messrs. and Madam:

I have been retained by Samuel J. Mangel to pursue his rights and remedies against each of you, arising out of certain defamations, tortious interference, harassment and stalking which you have committed and are actively pursuing against him in Florida and throughout the world.

You in particular, Mr. And Mrs. Santos and Mr. Papery, individually and through your entities, as co-conspirators, have published lies about him on the internet, and in emails and direct communications to third persons and entities, damaging his reputation and earning ability. I am attaching the latest defamatory email sent by Mr. Santos to a prospective employer of my client, and other emails spewing lies and venom to various persons and entities this month. You have demeaned my client's character and ability with these falsehoods about events which never occurred, and through blatant contrivances such as fake emails alleging conversations and interactions with third parties that never took place. It is noteworthy that you refer to him as an expert and feature him as such in videos and text on at least one of your websites.

Your fraudulent handiwork is easy to see. A simple name search for my client and associated keywords on Google and other search engines brings up these lies, including the one saying you terminated him, when it was the other way around as evidenced by his December 31, 2022 written notice to you as per his agreement with Earning Freedom Corporation. I see various websites with which you do "business", and have screen grabs of direct defamations of my client on more than one of them. Those sites include earningfreedomcorp.com, prisonprofessors.com, whitecollaradvice.com, compliancemitigation.com, michaelsantos.com, justinpaperny.com, and etikallc.com. Perhaps there are others of which I am currently unaware.

One interesting aspect of your business involves your employment of him with your for-profit entity, but payment to him by more than one of your non-profit entities, and even by Etika, LLC. I do not yet know how you handle all of this with your bookkeeping and accounting, but I know how his work was invoiced and revenue generated by him was collected by you, and it all just seems extremely suspect to me. Do you do this with anyone else and have you brought any of it to the attention of relevant parties or entities, let alone to those with whom you do business or conduct seminars?

This is Florida and Florida statutory and common law applies specifically to your actions. You are subject to Florida personal jurisdiction and, more importantly in your case, to Federal jurisdiction here in the Southern District of Florida. You will need Florida legal counsel once he sues all of you, and he will, without delay, unless you immediately take down every single reference to him on every search engine, cease and desist using his name in any emails, written or electronic communications sent by you or your agents to any third persons and entities, and remove his name and all videos in which he appears on any and all web sites. In litigation, Mr. Mangel will take depositions, conduct massive discovery and expose every facet of your business, entities, finances, bookkeeping and accounting, to everyone you do business with and all relevant persons and entities. He will not stop until the public record

Messrs. And Madam Santos and Papery January 19, 2023

contains all of it and until a Florida jury makes you pay money damages to him for the grave harm you have caused.

I will be monitoring the internet and your communications. If you do not comply with these demands forthwith, my client will file suit against all of you in Florida for defamation, tortious interference with current and prospective business relationships, harassment and stalking. You should not be doing business, at all, and if you insist on continuing to injure him, that will be the result.

This is the only notification you will receive in this regard.

Sincerely,

Ned Kimmelman

Encls.