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December 29, 2022

Received via  
mail 1/4/23

**VIA CERTIFIED MAIL &  
E-MAIL**

Manda Moore-Joseph  
2220 Waverly Ct  
Navarre, FL 32566  
[mandaleighmoore@gmail.com](mailto:mandaleighmoore@gmail.com)

**Re: Cease and Desist Letter**

Ms. Manda Moore-Joseph:

My name is Michael Kelly and my firm and I represent The Pensacola Humane Society (hereinafter "PHS") pertaining to issues surrounding your employment. It has come to my attention that you have engaged in improper, false, and defamatory statements against my client as well as board members affiliated with PHS, violating their privacy rights. I am writing in hopes of resolving this matter before having to take further legal action.

As you know, on December 27, 2022, you received notice that your employment with PHS had ended. Upon information and belief, even after your employment ended you have continued to speak to PHS employees and outside parties with disparaging remarks concerning PHS and/or board members of PHS. Your statements are reckless and unsupported by the facts. Your publication of these false statements to third parties is actionable under Florida law. The statements are damaging to PHS as well as board members/employees because they depict that PHS and/or its board/employees are engaged in illegal, improper, or unethical conduct, which they are not.

It is abundantly clear that you engaged in false and improper conduct against PHS, violated the privacy rights of board members and employees, and also defamed their character. These actions are in clear violation of the law. This has also damaged my client's business relationships, interfered with PHS' business practices, and injured PHS' reputation. While this is more than enough for PHS to pursue legal action against you, this letter will seek to provide a final warning to cease any and all disparaging and untruthful communications with PHS employees and outside parties.

PHS fully supports free speech and your right to a platform, but it cannot permit the publication of untrue statements and allegations that harm PHS' interests. Demand is hereby made that you: (1) permanently remove any and all defamatory content from social media within forty-eight (48) hours of your receipt of this correspondence; (2) immediately cease and desist from any further publication of defamatory statements regarding PHS and board members/employees; and (3) immediately cease and desist

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from all other behavior that disrupts PHS's operations, including inappropriate postings on social media.

It is PHS' desire to reach an amicable resolution in this matter. However, it will be unable to do so unless you immediately comply with these demands. Should you fail to comply, PHS will pursue all available legal remedies against you, including, without limitation, a lawsuit for defamation and interference with business relationships. If forced to take legal action, PHS will seek to recover attorney's fees from you as well.

In the event you choose to continue engaging in this improper conduct, this letter is also a formal request that you take steps to immediately preserve any and all documents, correspondence, social media postings, reviews, things, and electronically stored information (including e-mails and texts) that in any way relate to these communications, your employment, any and all responses to these communications.

If you would like to discuss further, you can reach me at 850-483-5930 or contact me via email at [michael.kelly@csklegal.com](mailto:michael.kelly@csklegal.com).

Sincerely,

*Michael B. Kelly*

Michael B. Kelly  
*For the Firm*

cc: Pensacola Humane  
Society Board Members  
MBK/za