

July 8, 2019

NOTICE TO CEASE AND DESIST

James Bryson
Panama Now Online
Panama City, Panama

RE: Defamation of Character – For Libel and/or Slander

Dear Mr. Bryson:

I have been retained by OCEANS GROUP INTERNATIONAL(OGI) in order to address false and disparaging statements that have been made by you, and published in an Editorial located at <http://panamanowonline.com/editorial-how-my-family-was-screwed-by-red-frog-beach-in-bocas-del-toro/> (the "SITE"). OCEANS GROUP INTERNATIONAL believes that the information on the SITE is misleading and is causing damage to their business reputation.

OCEANS GROUP INTERNATIONAL is a respected company and their stockholders have spent their years in Panama building a positive reputation. Nevertheless, you have been maliciously spreading inaccurate and unfounded information that is damaging their professional activities and reputation.

According to Panamanian Law, it is unlawful and punishable by law to falsely divulge that a person has committed a felony. Also please note that OCEANS GROUP INTERNATIONAL can also seek civil redress against you for making deliberate statements that intend to harm a person's reputation without factual evidence.

Defamatory statements on the SITE include, but are not limited to, the following:

1. That OCEANS GROUP INTERNATIONAL, under their project RED FROG BEACH are "using the indigenous, uneducated and desperate people of that region to operate a campaign of local intimidation and it creates a downright unsafe and very dangerous environment."
2. That OCEANS GROUP INTERNATIONAL and Mr. Joseph Haley, through their project RED FROG BEACH, induced the labor strike that affected the construction for the project, willingly creating a delay in construction.
3. That OCEANS GROUP INTERNATIONAL and Mr. Joseph Haley, willingly forced and extorted owners.
4. That OCEANS GROUP INTERNATIONAL and Mr. Joseph Haley committed fraud on owners.

This shall serve as a pre-suit letter demanding that you provide us written assurance within 30 days that you will remove all of the offending content from the SITE. cease and desist from making further factually untrue statements.

If you do not comply with this cease and desist letter within the aforementioned time period, then OGI shall take all legal measures afforded to it in the proper jurisdiction, seeking all available legal remedies including civil and criminal prosecution.

Best Regards,

Carmen Vicente

