



James W. Armstrong  
Shar Bahmani  
Steven R. Beeghley  
Stephen Aron Benson  
Brian E. Ditsch  
Paul F. Dowdell  
Judith M. Dworkin  
Patty A. Ferguson  
Candace D. French  
Roxann S. Gallagher  
Gregory P. Gillis  
James C. Golden  
Steven M. Goldstein

Bryan J. Gottfredson  
Michael J. Harris  
Evan F. Hiller  
M. Kathryn Hoover  
Jeremy R. Jarrett  
Robert G. Kimball  
Michael L. Kitchen  
Katya M. Lancero  
Jeffrey S. Leonard  
Christopher D. Lonn  
Michael W. Margrave  
Sierra M. Minder  
Phoebe Moffatt

Randy Nussbaum  
Wesley D. Ray  
Lauren M. Reynolds  
Michael R. Rooney  
Clifford J. Roth  
Philip R. Rudd  
James S. Samuelson  
Sharon B. Shively  
David C. Tierney  
Laura M. Trujillo  
Patrick J. Van Zanen  
Matthew F. Winter

Gary E. Pace, CLM, Executive Director



**Author:** Katya M. Lancero

480.425.2621 | [lancero@sackstierney.com](mailto:lancero@sackstierney.com)

January 19, 2024

BlitzMetrics  
Mr. Dennis Yu  
1250 264th Street  
Harbor City, CA 90710  
[dennis@blitzmetrics.com](mailto:dennis@blitzmetrics.com)

*Sent via U.S. Certified Mail and Email ([dennis@blitzmetrics.com](mailto:dennis@blitzmetrics.com))*

**Re: Cease and Desist Letter re: Relentless Digital**

Mr. Yu:

This law firm represents Relentless Digital, LLC (referred to herein as “RD”) in connection with its claims against you and your business BlitzMetrics for defamation, intentional interference with business relations, fraud, and extortion, among other potential claims and charges.

In 2023, RD contracted with Travis and Sons Plumbing & Rooter (“Travis & Sons”) for RD to provide Travis & Sons with digital marketing services. Since that time, you proceeded to publish a series of defamatory statements about RD and its founder, Joshua Crouch, on Facebook and in other forums. Specifically, you have stated that RD is a scam, RD is fraudulent, RD ripped Travis & Sons off, they “should go to jail,” and they did not perform any work for the compensation received. In reality, RD is a respected digital marketing company that utilizes Joshua Crouch’s experience in the HVAC industry to provide valuable insights into a customer’s marketing plan.

Further, you held a Zoom call with Travis & Sons in which you published additional defamatory comments about RD and intentionally and improperly interfered with RD’s business relations with Travis & Sons in violation of Arizona law. Finally, you have threatened and are continuing to threaten on numerous forums (including on posts on social media) to publish an article and “expose the facts” about RD and Joshua Crouch *if* RD does not refund Travis & Sons tens of thousands of dollars, money that RD lawfully earned.

*Demand to Cease and Desist or Face Legal Action*

RD hereby demands that you (1) immediately cease and desist making any further defamatory statements regarding RD or Joshua Crouch via any method of communication, including any website or social media platform; (2) immediately delete any and all existing posts, reviews, social media, videos, statements, and/or other publications related to RD and Joshua Crouch; (3) issue a retraction on all social media platforms and all other media on which the foregoing posts, reviews, statements or other publications were made; (4) refrain from posting any article you have threatened to post; and (5) refrain from threatening to post any such article. Proof of all such retractions must be emailed to me at as soon as possible, but no later than **Wednesday, January 31, 2024**.

If you fail to comply with the foregoing demands, RD will exercise any and all legal remedies against you and BlitzMetrics, including, but not limited to, filing a lawsuit against you in court. In the event RD is forced to file a lawsuit, it will seek all of its presumed damages associated with your defamatory *per se* statements as well as actual damages associated with, for example, customers terminating their accounts with RD due to your posts. RD will also assert claims against you and BlitzMetrics for intentional interference with business relations.<sup>1</sup> Furthermore, if you post any such article, RD will include that fact in its lawsuit against you and BlitzMetrics. RD will not hesitate to initiate legal action against you and BlitzMetrics, along with any other appropriate defendants, to protect its legal rights.

Direct any further inquiries related to this matter to my attention. Thank you for your prompt attention to these matters.

Sincerely,

SACKS TIERNEY P.A.



Katya M. Lancero

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<sup>1</sup> Additionally, it appears that your threat to publish an article subjecting RD to hatred, contempt, or ridicule or impairing RD's business in exchange for \$25,000.00 may be a violation of the criminal extortion statute A.R.S. § 13-1804(A)(6).