



MARCY I. LAHART PLLC

**Animal Law, Civil Rights,
Fair Housing**

**861 S. 40th Street, Tacoma WA 98418
Licensed in Washington and Florida**

October 30, 2025

Alberto R. Leal, Esq.
8927 Hypoluxo Rd # 157
Lake Worth, FL 33467-5262
Via email only to albertolealesq@gmail.com

RE: New Moon Reptiles, LLC and Two Amigos Import & Export Inc.

Dear Mr. Leal:

Darika Saekow has asked that I respond to your October 20, 2025 correspondence which asserts she has “been engaging in a pattern of defamatory conduct” against your client. You only identify one allegedly defamatory statement; the reference to your clients as “animal killers.” First, Ms. Saekow has never referred to New Moon Reptiles, LLC or Two Amigos Import & Export Inc. as “animal killers.” Further, your client shipped temperature sensitive animals as if they were widgets, notwithstanding forecasted inclement weather. This action by your client caused many sentient creatures to experience painful deaths. The act of causing animals to die from exposure, whether intentionally, or through indifference and greed, is nonetheless killing animals.

To bring a cause of action for defamation in Nevada or Florida it is necessary for a would-be plaintiff to identify a false statement. You have not identified any false statement published by my client. Inflammatory and harmful characterizations, i.e., unflattering opinions, are constitutionally protected. My client will not cease publishing “false, misleading, or defamatory statements about New Moon Reptiles LLC or its owners, agents or affiliates” because she has not begun publishing “false, misleading, or defamatory statements about New Moon Reptiles LLC or its owners, agents or affiliates.” If Ms. Saekow’s factual statements regarding what she personally witnessed and her opinions regarding same have tarnished your client’s professional standing, your client would be better served by immediately and drastically improving their animal welfare practices rather than threatening to bring baseless litigation.

Ms. Saekow will not cease exercising her first amendment rights or remove previously posted content from social media unless you can identify any specific factual statements or posts by my client that are demonstrably untrue. Going forward please direct any further communications regarding this matter directly to me, not to Ms. Saekow.

Sincerely,

/s/ *Marcy LaHart*

Marcy LaHart, Esq.

352-545-7001

marcy@doglaw.co