



**DONALD JOE WILLIS**

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February 24, 2010

**VIA E-MAIL [WARNCKE@COMCAST.NET](mailto:WARNCKE@COMCAST.NET) AND FIRST CLASS MAIL**

Mr. Ersun Warncke  
Business/Economy Reporter  
Salem-News.com  
Post Office Box 5238  
Salem, OR 97304

**Re: Your Story Published Tuesday, February 23, 2010, Entitled:  
"The Southwestern Company - Part 1: Corporate Mafia"**

Dear Mr. Warncke:

This firm represents the Southwestern Company and, on its behalf, please consider this a formal demand under Oregon law to retract the article referenced above, to do so immediately and to publish the retraction in the same manner and for the same length of time that the article was published and remained posted.

Also, please consider this a demand under Oregon law: 1) to immediately take this article down from the cite where it now exists; 2) to also take it down from any other site where it may have been posted that is under your control; 3) to also not post the article at any other site; and 4) to not post any other articles concerning Southwestern Company which contains false and defamatory statements. Rest assured that if these requests are not complied with immediately, Southwestern Company will take all appropriate legal action against both of you in order to protect its interests.

It is obvious from reading your article that you have done nothing to verify any facts or offer any factual support for the completely, totally and outrageously false statements contained in it which accuses Southwestern Company and other companies associated with it of serious criminal conduct. Making such claims that it is a "corporatized mafia organization operating throughout the United States," that the Company "is and has been engaged in a highly organized criminal operation that includes tax evasion, money laundering, illegal immigration violations, labor law violations, and ruthless exploitation of workers," and reference to an upcoming article "A RICO Case" where you claim you will "lay out the evidence and arguments that demonstrate a widespread and ongoing pattern of racketeering activity," your claim that you will "provide

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evidence of organized and intentional violations of U.S. immigration laws” and your claim of a “Web of Deceit,” where you claim you will demonstrate some connection “that make up the core of the Southwestern Company Mafia” are all absolutely without basis or justification and are so far-fetched and extreme that it is beyond question that you have made no effort to investigate or try to verify any facts (because none exist) of these very serious criminal charges.

I have checked with the Southwestern Company and they have no record or information indicating that you ever contacted them, or even any effort to contact them, to verify what they truly do.

Please let me know immediately what your intentions are. If you refuse to honor this request, Southwestern Company is fully prepared to take all appropriate legal steps to protect its interests from such vicious and untrue attacks.

Please let me hear from you at your earliest convenience.

Sincerely,

  
Donald Joe Willis

JW:ksn  
cc: Client

