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Via Email ONLY

January 6, 2014

New Mexico Department of General Service Risk Management Division 1100 St. Francis Dr., Joseph Montoya Bldg., Room 2073 Santa Fe, NM 87502

RE: NMSA 41-4-16 Tort Claim Notice; 30 Day Notice of Intent to Sue

Dear Mr. Forte:

This letter is to serve as Notice of the Claims my office intends to pursue on behalf of my clients Valley Meat Company, LLC and Ricardo De Los Santos against New Mexico Attorney General Gary King, his office, and certain employees of his office acting under the color of his elected office.

Based upon press releases, letters, communications, pleadings and other relevant documents created under Mr. King's authority as well as oral public statements and actions, my clients intend to bring claims against Mr. King for:

- 1. Libel;
- 2. Slander;
- 3. Prima Facie Tort;
- 4. Civil Conspiracy;
- 5. Harassment, and
- 6. Malicious Abuse of Process



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Mr. King's conduct in this regard is ongoing and on top of damages for the harm perpetrated under these torts, we will be seeking equitable relief.

Very truly yours,

/s/Blair Dunn

A. Blair Dunn, Esq.

cc: Gary King Attorney General