



**BY EXPRESS COURIER**

December 2, 2022

Mortimer Clausterfeld, aka "Santa Claus"  
Claus Worldwide Enterprises, Inc. ("CWE")  
1 North Pole Plaza, North Pole 45-371, Arctic Ocean, 90° N, 135° W

**RE:** Designation of Timmy Johnson as Naughty - NOTICE OF DEMAND AND INTENT TO SUE

Dear Mr. Claus:

This firm represents Timmy Johnson, an 8-year-old male child residing with his parents and older sister in Bloomington, Minnesota, United States of America. Timmy is a curious, adventurous, caring child beloved by his parents, classmates, and many others. Over the past year, Timmy has performed numerous documented altruistic deeds and has repeatedly demonstrated his good nature.

Upon information and belief, each year CWE compiles and maintains a list of all children in the world (the "List") designating them as one of two classifications, "Naughty" or "Nice". My client has recently discovered that he has been designated as Naughty for this year. As you well know, designation as Naughty on the List results in serious and irrevocable consequences and damages, such as but not limited to being provided with demeaning gifts such as coal and a reduction in social status among family and friends causing considerable emotional distress. Timmy has retained our firm to ensure this egregious error is corrected.

It is clear from our review of public information relating to the designation process that both the process and criteria used are arbitrary, capricious, fraught with error, biased, and fatally flawed. The terms "naughty" and "nice" are vague and subject to interpretation. The process relies on biased and unreliable sources of information, such as older sisters who may hold a grudge against a younger brother resulting from the destruction of said sister's favorite doll in which my client's involvement was never proven. Other designation data sources include CWE's admitted surveillance of children while sleeping and while awake to determine if they are "bad" or "good", a clear invasion of privacy and a likely violation of numerous state and federal laws (not to mention CWE's breaking and entering on a global scale). While CWE claims to conduct a secondary review of the List people to finalization, this simply re-applies the original, flawed designation process and criteria. Further, my client notes that his sister has inexplicably been designated as Nice despite personally witnessing numerous instances over the past year in which she has been very, very naughty.

CWE and its personnel owe my client, and all children around the world, a duty to properly and accurately designate them on the List. Their failure to implement and utilize a fair and equitable designation process and criteria is a clear breach of such duty which will proximately cause my client serious damages if not corrected. We therefore demand the immediate revocation of Timmy's designation as Naughty and his timely re-designation as Nice. Should your client fail to promptly do so, we will be forced to take all necessary actions at law and in equity to protect Timmy's interests, which may include the commencement of a class action lawsuit against you and CWE seeking injunctive relief, specific performance, punitive damages, and attorneys' fees. We await your response. Happy Holidays.

Sincerely  
Eric Lambert

cc: Hermey Elfenhagen, Esq., General Counsel and Lead Dentist, CWE