FICTIONAL SAMPLE · DRAFTED BY FREE DEMAND WRITER FROM A MADE-UP CASE FILE · NOT LEGAL ADVICE

PLEASE VERIFY BEFORE SENDING

Unverified AI draft. Every fact must be checked against the records before use. It is not legal advice. Fill in every [ADD: …] placeholder, set the demand amount, confirm anything marked [VERIFY], and delete this box before sending.

- Post 1 was published by "Shawna P." and the notes say Ms. Pell posted all three statements [firm notes]. Confirm that the Porchlight account is hers. Post 3 shows no platform name or URL, and the only capture date shown is November 20, 2025. Confirm the posts are still online now.
- The state's November 14, 2025 letter says there are no citations, disciplinary actions or complaints resulting in action, but gives no time period. Confirm it covers "last year" as the Lakeview post claims.
- The license records cover only Aaron Voss, Lena Ferraro and Kurt Lindqvist. The posts say "techs" and "techs aren't even licensed." Confirm every Birchline technician was licensed on October 28, 2025 and since. Kurt Lindqvist's statement that "all" are licensed is his own.
- Possible opinion: "One star," "Stay away," "scam" and "ripped me off" may be treated as opinion or rhetoric rather than fact. The letter treats them as tied to the factual claims. Attorney to decide how to frame them.
- The harm records were prepared by Kurt Lindqvist. The Okonkwo item is his phone note, not her own words in writing. The call-volume comparison (63 vs. 41) shows timing, not cause. Confirm underlying emails and notes are in the file.
- The letter acknowledges that the $2,800.00 charge was accurate, per the invoice. Confirm that is the intended framing.
- The firm notes say money is sought only if Ms. Pell refuses. The conditional language and [ADD: demand amount] are placeholders. Also add the response deadline and the correction wording.
- Missing: firm address and contact details, date, delivery method, Ms. Pell's address, platform and URL for Post 3. The platforms are not addressed as recipients.
- [VERIFY: Minnesota rule on retraction demands (required content, timing, effect on damages)]
- [VERIFY: Minnesota anti-SLAPP rules]

Halvorsen Achebe PA
[ADD: firm street address]
[ADD: city, state ZIP]
[ADD: phone] · [ADD: email]

[ADD: date]

VIA [ADD: delivery method]

Shawna Pell
[ADD: street address]
[ADD: city, state ZIP]

Re: Demand for Removal, Retraction and Correction of False Statements about Birchline Heating & Air LLC (statements published November 3–6, 2025)

Dear Ms. Pell:

Introduction

We represent Birchline Heating & Air LLC ("Birchline"), owned by Kurt Lindqvist, regarding statements you published about Birchline on or around November 3, 5 and 6, 2025 [captured_posts.pdf p.1] [firm notes]. This letter identifies the statements, explains why they are false, describes the harm they have caused, and sets out what Birchline requires of you. Please direct all further communication about this matter to this office.

The statements

The following statements were published online and captured by Mr. Lindqvist. All three were still online on November 20, 2025 [captured_posts.pdf p.1].

Date	Where published	Statement (quoted)	Source
November 3, 2025	Porchlight Reviews, business page for Birchline Heating & Air, by "Shawna P." (porchlightreviews.com/biz/birchline-heating-air-northfield). Shown with 1,240 views.	"One star. Birchline charged me $2,800 for a furnace part that was never installed. I checked after they left and the old part is still in there. Their techs aren't even licensed. Stay away."	[captured_posts.pdf p.1]
November 5, 2025	Lakeview Neighbors community board, "Home Services" thread, by account "Shawna Pell" (lakeviewneighbors.org/board/home-services/48817). Shown with 37 replies and 412 reactions.	"Warning to everyone, Birchline Heating was cited by the state for fraud last year. They ripped me off for $2,800 and the part was never installed."	[captured_posts.pdf p.1]
November 6, 2025	Public social media account of Shawna Pell, [ADD: platform and URL]. Shown with 96 shares.	"Birchline Heating & Air = scam. Unlicensed techs and a fraud citation. Share this."	[captured_posts.pdf p.1]

Why the statements are false

The statements make three factual claims. Each is contradicted by records that were made at the time or issued by the state.

The claim that the part was never installed. Birchline's Service Invoice No. 31907 shows that on October 28, 2025, technician Aaron Voss, assisted by Lena Ferraro, diagnosed a no-heat call, found a failed inducer motor assembly, and replaced it with a new part with a serial number ending 7713. He then tested the ignition sequence and venting, and the furnace was running normally [service_records_and_licenses.pdf p.1]. The invoice bears the customer signature "Shawna Pell" on completion [service_records_and_licenses.pdf p.1]. Time-stamped photographs from October 28, 2025 show the old inducer motor removed, with its serial plate visible. They also show the new inducer motor installed in the furnace, with the serial plate ending 7713 visible. A third shows the old part in the technician's truck bin, tagged with the invoice number [service_records_and_licenses.pdf p.1]. The old part was therefore removed, as the photographs show, and could not have been "still in there" as the November 3 review states.

Birchline does not dispute that it charged $2,800.00 for the service. The invoice itemizes it as parts of $1,935.00, labor of $742.50 and an after-hours call fee of $122.50, and it was paid by card on October 28, 2025 [service_records_and_licenses.pdf p.1]. The statements are false in saying that the charge was for a part that was never installed.

The claim that Birchline's technicians are unlicensed. The records show that Aaron Voss holds an active state-issued HVAC technician license, renewed March 2025, and Lena Ferraro holds an active state-issued HVAC technician license, renewed June 2025. Kurt Lindqvist holds an active contractor license [service_records_and_licenses.pdf p.1]. This claim appears in the November 3 review and the November 6 post.

The claim that Birchline was cited by the state for fraud. In a letter dated November 14, 2025, the state licensing office wrote: "Our records show no citations, disciplinary actions or complaints resulting in action against Birchline Heating & Air LLC or its license holders." [service_records_and_licenses.pdf p.1]. This claim appears in the November 5 post and the November 6 post. To the extent the November 6 post's use of "scam" asserts that Birchline defrauded a customer, the records above show that assertion is also false.

Birchline responded publicly on Porchlight Reviews on November 7, 2025, stating that it replaced the inducer motor on October 28, that it has photos and a signed invoice, and that its technicians are licensed. The review was not changed [harm_records.pdf p.1].

Harm to our client

Birchline's records document the following events shortly after the statements appeared [harm_records.pdf p.1]:

Date	Event	Source
November 6, 2025	Customer Paul Herrick cancelled a scheduled furnace replacement quoted at $9,450.00. His email said: "I saw on the Lakeview board that you were cited for fraud. I am going with someone else."	[harm_records.pdf p.1]
November 8, 2025	Customer Dana Okonkwo cancelled an annual maintenance agreement ($289.00). A phone note records that she said she read the Porchlight review about unlicensed techs.	[harm_records.pdf p.1]
November 10, 2025	Prospective customer Gina Albrecht asked by email: "Is it true your guys aren't licensed? I read it online." Mr. Lindqvist replied with the license records. She did not book.	[harm_records.pdf p.1]
November 12, 2025	Northfield Lake Property Management, which manages 14 rental homes, emailed that it is "pausing" all service calls with Birchline "until the fraud issue is resolved."	[harm_records.pdf p.1]

Birchline also recorded 63 booked service calls from October 13 to October 31, 2025, and 41 from November 1 to November 19, 2025 [harm_records.pdf p.1].

Demand

Birchline demands that you do the following:

- Remove the three statements identified above, from Porchlight Reviews, the Lakeview Neighbors community board and your public social media account, along with any other copies or reposts within your control.
- Publish a retraction and correction in the same places where the statements appeared, using this wording: [ADD: wording of correction].
- Stop repeating these statements, or statements to the same effect, in any form or forum.
- Confirm in writing to this office by [ADD: response deadline] that you have done these things.

If you decline to comply, Birchline reserves the right to pursue all available civil remedies, including monetary damages in the amount of [ADD: demand amount] [firm notes].

Please preserve all documents, data and communications relating to this matter. These include the posts, comments, replies and messages connected to them, your account data for each platform, any photographs or communications relating to Birchline, and records of the October 28, 2025 service. Do not delete or alter them, even after you remove the posts from public view.

State rules

This matter is governed by Minnesota law. [VERIFY: Minnesota rule on retraction demands (required content, timing, effect on damages)] [VERIFY: Minnesota anti-SLAPP rules]

This letter is not a complete statement of the facts or of Birchline's rights and remedies, all of which are reserved.

Sincerely,

Erik T. Halvorsen
Halvorsen Achebe PA