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.

- Demand amount, response deadline, delivery method, recipient and firm addresses, and the marketplace name are placeholders. The sources do not say whether PureArroyo has counsel. Please confirm before sending.
- Corrective advertising and damages are left open per the firm notes. Confirm with the client whether to include either.
- The Rio Lumen report was commissioned by Sandcrest and tested one lot per product (3 units each) at a 150 ppb challenge level. PureArroyo's own test method is unknown. Confirm the client approves using the report and whether to enclose it.
- The lab buys were June 12 to 15, 2026, and the boxed ProPitcher was bought June 12, 2026. The sources do not say the tested lot is the boxed unit. The purchase receipt and the Sandcrest specification sheet (revision March 2025) are referenced but are not separate files. Confirm the sheet was current when the ads ran.
- No evidence in the sources supports or refutes "Independent lab certified," "The only pitcher filter in the Southwest independently certified for lead," "half the cost per gallon," or the basis for "fail lead tests." These carry [ADD] placeholders. The sources also do not give PureArroyo's price.
- Sandcrest's own package says "Reduces lead by up to 98%," while the lab found 98.6% at rated capacity. Confirm this does not create an issue.
- The June 2 Baca email refers to an email "saying your filters fail lead tests." The forwarded May 20 blast as captured says "removed only 61%," and the "fail lead tests" wording is on the flyer. The retailer who forwarded the blast is unnamed. Confirm attribution of each piece to PureArroyo.
- Sales totals are copied as read ($72,935.00 and $15,450.00) and must be checked against the controller's report. The figures are not a damages calculation. Rio Abajo still shows 2026 sales, and the Medina and Begay emails are temporary ("pausing," "for now"). Confirm the client is comfortable naming these accounts to a competitor.
- [VERIFY] items: the Lanham Act reference and New Mexico unfair competition and false advertising law, including remedies and any pre-suit notice.
- To avoid defamation exposure, the letter quotes only the documented statements and describes only what the lab report shows. Please review the wording of the "false or misleading" characterizations.

Archuleta Brandt LLP
[ADD: firm street address]
[ADD: city, state ZIP]
[ADD: phone] · [ADD: email]

[ADD: date]

VIA [ADD: delivery method]

Martin Quezada, Chief Executive Officer
PureArroyo Filtration Co.
[ADD: street address]
[ADD: city, state ZIP]

Re: Demand to Cease False and Misleading Advertising of the PureArroyo ProPitcher; Our Client: Sandcrest Water Systems LLC

Dear Martin Quezada:

Introduction

We represent Sandcrest Water Systems LLC ("Sandcrest") about advertising by PureArroyo Filtration Co. ("PureArroyo") for its ProPitcher pitcher filter [firm notes]. The advertising makes performance and comparison claims about Sandcrest's Classic pitcher filter that Sandcrest's testing does not support. Sandcrest had not contacted PureArroyo or any online marketplace about these claims before this letter [lost_accounts_and_sales.pdf p.1].

The advertising claims

Sandcrest captured or collected the following PureArroyo advertising [advertising_captures.pdf p.1]. The claims are quoted exactly as they appear.

Claim	Where it appeared	Date	Source
"Removes 99.9% of lead. Tested and proven."	Website home page headline, purearroyo-filters.example	Captured June 9, 2026	[advertising_captures.pdf p.1]
"PureArroyo ProPitcher: 99.9% lead removal, 1,200 gallon filter life. Sandcrest Classic: 61% lead removal, 400 gallon filter life."	Website home page, comparison box	Captured June 9, 2026	[advertising_captures.pdf p.1]
"Independent lab certified."	Website home page, footer	Captured June 9, 2026	[advertising_captures.pdf p.1]
"3x the filter life of Sandcrest at half the cost per gallon."	Online retail marketplace product listing for ProPitcher [ADD: marketplace name]	Captured June 9, 2026	[advertising_captures.pdf p.1]
"The only pitcher filter in the Southwest independently certified	Online retail marketplace product listing for	Captured June 9, 2026	[advertising_captures.pdf p.1]

Claim	Where it appeared	Date	Source
for lead."	ProPitcher		
"Switch your shelves to PureArroyo. Sandcrest filters fail lead tests. PureArroyo removes 99.9%."	Trade show flyer, Southwest Home and Hardware Show, Rio Blanco Convention Center	May 14 to 16, 2026	[advertising_captures.pdf p.1]
"Recent independent testing showed Sandcrest Classic removed only 61% of lead. PureArroyo ProPitcher removed 99.9%."	Email blast to retailers, subject "Why buyers are dropping Sandcrest"	May 20, 2026	[advertising_captures.pdf p.1]
"99.9% Lead Reduction. 1,200 Gallons."	ProPitcher box, front panel (bought at Mesa Alta Hardware)	Purchased June 12, 2026	[advertising_captures.pdf p.1]

The PureArroyo website does not name the laboratory behind "Independent lab certified," and Sandcrest has not found any published PureArroyo test report supporting the 61% figure [advertising_captures.pdf p.1].

Why the claims are false or misleading

Sandcrest commissioned Rio Lumen Analytical Laboratory of Alameda Vista, New Mexico, to test both products. The filters were bought at retail from June 12 to 15, 2026: PureArroyo ProPitcher filters (lot PA-2604-118, 3 units) and Sandcrest Classic filters (lot SC-26-0412, 3 units) [lab_test_report.pdf p.1]. Each filter was run with challenge water containing lead at 150 parts per billion, following the lab's standard pitcher filter lead reduction protocol. Samples were taken at 25%, 50%, 75% and 100% of each manufacturer's rated capacity and at 120% of rated capacity [lab_test_report.pdf p.1]. The results are in Report no. RLA-26-1187, dated July 22, 2026, signed by Dr. Anita Velarde, Laboratory Director [lab_test_report.pdf p.1].

The table sets PureArroyo's statements beside what the report shows.

PureArroyo statement	What the records show	Source
"99.9% lead removal" / "Removes 99.9% of lead" / "99.9% Lead Reduction" / "PureArroyo removes 99.9%"	No PureArroyo unit reached 99.9% lead reduction at any sample point. Average reduction was 96.2% at 25% of rated capacity, 88.7% at 50%, 79.4% at 75%, 71.4% at 100% of its rated 1,200 gallons, and 58.9% at 120%.	[lab_test_report.pdf p.1]
"Sandcrest Classic: 61% lead removal" / "Sandcrest Classic removed only 61% of lead"	Sandcrest Classic averaged 99.1% at 25% of rated capacity, 98.8% at 50%, 98.4% at 75%, 98.6% at 100% (900 gallons), and 97.9% at 120%.	[lab_test_report.pdf p.1]
"Sandcrest Classic: ... 400 gallon filter life"	The Sandcrest Classic package and specification sheet state a rated capacity of 900 gallons, not 400 gallons.	[lab_test_report.pdf p.1]
Lead performance at 400 gallons (implied by the	At 400 gallons, PureArroyo units averaged 86.0% and Sandcrest units averaged 98.9%.	[lab_test_report.pdf p.1]

PureArroyo statement	What the records show	Source
comparison box)		
"99.9% Lead Reduction. 1,200 Gallons." (packaging)	At 100% of the 1,200-gallon rated capacity, PureArroyo units averaged 71.4% lead reduction.	[lab_test_report.pdf p.1]

On the remaining claims:

- "Sandcrest filters fail lead tests": the report shows Sandcrest Classic at 97.9% to 99.1% average lead reduction at every sample point [lab_test_report.pdf p.1]. We are aware of no published test report supporting this statement [advertising_captures.pdf p.1]. [ADD: evidence of any standard or benchmark under which Sandcrest Classic could be said to "fail"]
- "Tested and proven" and "Recent independent testing showed...": Sandcrest has found no published PureArroyo test report supporting the 61% figure [advertising_captures.pdf p.1]. The Rio Lumen results do not match PureArroyo's stated figures for either product [lab_test_report.pdf p.1].
- "3x the filter life of Sandcrest": the records show a rated capacity of 1,200 gallons for ProPitcher and 900 gallons for Sandcrest Classic [lab_test_report.pdf p.1]. PureArroyo's comparison box instead uses 400 gallons for Sandcrest Classic [advertising_captures.pdf p.1]. [ADD: PureArroyo's stated basis for the "3x" claim, if known]
- "half the cost per gallon": the records show a Sandcrest retail price of $24.99 per filter [lab_test_report.pdf p.1]. [ADD: evidence that this claim is false or misleading, including ProPitcher's retail price]
- "Independent lab certified" and "The only pitcher filter in the Southwest independently certified for lead": the website does not name the lab [advertising_captures.pdf p.1]. [ADD: evidence that these claims are false or misleading]

Harm to our client

After PureArroyo's trade show flyer and retailer email, three Sandcrest retail accounts wrote to Sandcrest that they were moving or pausing their purchases.

- On June 2, 2026, Teodoro Baca, Buyer at Rio Abajo Home Supply, wrote: "after the show and the email we got from PureArroyo saying your filters fail lead tests, our owner wants to move our pitcher filter shelf to PureArroyo starting July." He added: "If you have test data showing otherwise, send it." [lost_accounts_and_sales.pdf p.1]
- On June 18, 2026, Carla Medina, Purchasing at High Plains Hardware Cooperative, wrote: "We are pausing Sandcrest reorders while we look at the PureArroyo comparison numbers." [lost_accounts_and_sales.pdf p.1]
- On July 1, 2026, Jerome Begay, Owner of Four Mesas Market (3 stores), wrote: "Customers are bringing in the PureArroyo flyer. We are going with PureArroyo for now." [lost_accounts_and_sales.pdf p.1]

Sandcrest's sales to these accounts, from its accounting system (report run August 31, 2026, prepared by Ruth Calloway, Controller), were as follows [lost_accounts_and_sales.pdf p.1]:

Item	Period	Amount	Source
Sales to Rio Abajo Home Supply	June to August 2025	$38,420.00	[lost_accounts_and_sales.pdf p.1]
Sales to Rio Abajo Home Supply	June to August 2026	$6,150.00	[lost_accounts_and_sales.pdf p.1]
Sales to High Plains Hardware Cooperative	June to August 2025	$22,875.00	[lost_accounts_and_sales.pdf p.1]
Sales to High Plains Hardware Cooperative	June to August 2026	$9,300.00	[lost_accounts_and_sales.pdf p.1]
Sales to Four Mesas Market	June to August 2025	$11,640.00	[lost_accounts_and_sales.pdf p.1]
Sales to Four Mesas Market	June to August 2026	$0.00	[lost_accounts_and_sales.pdf p.1]
Total (as read from the sales report)	June to August 2025	**$72,935.00**	[lost_accounts_and_sales.pdf p.1]
Total (as read from the sales report)	June to August 2026	**$15,450.00**	[lost_accounts_and_sales.pdf p.1]

These figures are Sandcrest's recorded sales to these accounts and are not a calculation of its damages. Our client's full losses are still being assessed. [ADD: any additional lost sales or other harm the client wishes to include]

Demand

On behalf of Sandcrest, we demand that PureArroyo do the following by [ADD: response deadline]:

- Stop using each claim quoted above, and any substantially similar claim, about the lead removal, filter life, cost, or certification of the ProPitcher or the Sandcrest Classic.
- Remove those claims from every channel, including the website purearroyo-filters.example, the online marketplace listing, trade show and in-store materials, email and other communications to retailers, and product packaging.
- Confirm in writing that it has done so and describe the steps taken.
- Identify the laboratory referred to in "Independent lab certified" and "Recent independent testing," and provide every test report and data set on which PureArroyo relied for the 99.9% and 61% figures and for its certification claims.
- Preserve all documents and electronic records relating to these claims. These include test data and reports, communications with any laboratory or certifier, drafts and approvals of the advertising, distribution lists for the May 20, 2026 email, trade show materials, and sales and customer communications concerning Sandcrest.

[ADD: whether to demand corrective advertising]

[ADD: whether to demand payment for damages] If damages are sought, our client also demands payment of [ADD: demand amount].

Legal basis

The statements described above may violate federal false advertising law under the Lanham Act [VERIFY] and New Mexico unfair competition law [VERIFY: New Mexico unfair competition and false advertising law, remedies and any pre-suit notice]. This letter is based on the information currently available to us. It is not a complete statement of Sandcrest's claims, and Sandcrest reserves all rights and remedies.

Please direct all communications about this matter to me.

Sincerely,

Isabel R. Archuleta
Archuleta Brandt LLP