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March 23, 2024

Via Email

Mr. Dariusz Banasik  
704 S. Spring St., Suite 1402  
Los Angeles, CA 90014  
[darius@qyral.com](mailto:darius@qyral.com)

RE: Qyral.com / Cease and Desist Letter

Dear Mr. Banasik,

I have just been retained to represent Ms. Hanieh Sigari and Qyral, LLC in connection with the matter of your trade libel and defamation, purported, but illegal firing of employees for which you have no authority, and unlawful hacking and lock-out of Ms. Sigari from her business, Qyral.com and Qyral, LLC. At this point, I do not know whether you are represented by counsel; if you are represented by counsel, please pass along this letter and do not reply directly. I was told that Mr. Douglas Robin, Esq. of Menlo Park represents you in some capacity, although I was not able to verify this because the summons in the divorce papers you filed (I have only seen the first page) show you as being in pro per. I also don't think Mr. Robin, whom I know from another legal matter, would advise you to do any of the things you are doing, and so this is probably a separate matter from whatever he is handling. I copy him here, in any case.

In any event, Qyral, LLC is a wellness company with approximately 1,300 wellness consultants who travel the country promoting Qyral products to their networks, and elsewhere. That is 1,300 people, plus my client, who rely on Qyral for their livelihoods. *Qyral is my client's company*, not yours— she is the CEO, sole manager, and sole member of the LLC. Through your illegal actions yesterday 3/22/2024, you have irreparably harmed the company and its many employees and consultants, as well as my client.

To summarize yesterday's events, according to my client, you *illegally and without proper authority* (1) took control of and locked my client out of all of Qyral's I.T. infrastructure, including its Google Administrator panel, domain name, Shopify account, phone numbers, email accounts, and all other electronic assets; (2) shut off my client's mobile phone number, thereby preventing her from resetting her passwords and interacting with various service providers; (3) sent out a false, defamatory "announcement" stating that my client had been removed from her position with Qyral for purported breaches of fiduciary duty; (4) announced that the Facebook group (still controlled by my client) was no longer authoritative and should be considered compromised; (5) started transferring an as-yet unknown amount of money out of the business accounts. All of this was in violation

of the law, specifically the Computer Fraud and Abuse Act, which is a Federal criminal statute that prohibits exactly your conduct. Your conduct also violated the Automatic Temporary Restraining Orders that are on the Summons that *you filed* in the recent divorce case that is pending in Santa Clara County, and numerous other provisions of State law in the Penal Code. I assure you that there will be a reckoning in court; that is not the purpose of this letter.

The purpose of this letter is to demand that you immediately cease and desist your unlawful course of conduct, retract the false email announcements, and restore my client's control of her I.T. infrastructure. It's very simple; if you do not *immediately comply*, we will be taking this to court on Monday morning the 25th and will start pursuing all available remedies against you. "All available remedies" typically means a combination of all or some of (1) costly civil litigation against you that may result in a substantial damages award/judgment; (2) a Domestic Violence Restraining Order petition due to your financial abuse of my client as indicated above; (3) contempt papers for your violations of the Automatic Temporary Restraining Orders; and (4) attorney fees for each of the foregoing. I strongly urge you to reconsider your illegal course of action immediately, and if Mr. Robin does, in fact, represent you on the matter of your illegal conduct, I would invite you to ask him to reply.

Sincerely,



Andrew G. Watters, Esq.

cc: Mr. Douglas Robin, Esq.  
drobin@rfklaw.com