

**IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA**

MIRAYINT CRUISE MANAGEMENT LTD.
and LIFE AT SEA CRUISES, INC.,

Case No. CACE-22-014436

Plaintiffs,

v.

MIKAEL S. PETTERSON,
also known as
MIKAEL S. PETTERSSON,
FOURNEAU INTERNATIONAL LLC,
and FOURNEAU MANAGEMENT LLC,

Defendants.

**AFFIDAVIT OF KENDRA HOLMES IN SUPPORT OF
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

I, Kendra Holmes, after being duly sworn, depose and say:

I am over 18 years of age and competent to testify herein, and testify herein
of my own and personal knowledge.

I am the Chief Executive Officer of Plaintiffs MIRAYINT CRUISE
MANAGEMENT LTD. and LIFE AT SEA CRUISES, INC.

The following is a chronology of the facts pertinent to this case;

1. MIRAYINT CRUISE MANAGEMENT LTD. is a company organized in the
Turkish Republic of Northern Cyprus since at least July 6, 2022, and
its principal and controlling shareholder is Vedat Ugurlu. A Certificate
from the Turkish Republic of Northern Cyprus is attached hereto as
Exhibit 1.
2. MIRAYINT CRUISE MANAGEMENT LTD. has done business and has
been known as "Miray Cruises."

3. Before December 1, 2022, I saw the passport of MIKAEL S. PETERSON and in his passport his last name is spelled PETERSSON. He also uses "Mike" as an abbreviated form of his name.
4. Effective on December 1, 2022, MIRAYINT CRUISE MANAGEMENT LTD. and FOURNEAU INTERNATIONAL LIMITED entered into the CONSULTING SERVICES AGREEMENT attached hereto as Exhibit 2.
5. MIKAEL S. PETERSON signed the CONSULTING SERVICES AGREEMENT on behalf of FOURNEAU INTERNATIONAL LIMITED.
6. On January 30, 2023, Vedat Ugurlu organized by filing with the Florida Department of State LIFE AT SEA CRUISES, INC. The filed Articles of Organization are attached hereto as Exhibit 3, and the current online Detail by Entity Name is attached hereto as Exhibit 4.
7. On February 27, 2023, MIKAEL S. PETERSON organized by filing with the Florida Department of State FOURNEAU INTERNATIONAL LLC. The filed Articles of Organization are attached hereto as Exhibit 5, and the current online Detail by Entity Name is attached hereto as Exhibit 6.
8. By its own terms, the CONSULTING SERVICES AGREEMENT terminated on February 28, 2023.
9. On March 7, 2023, MIKAEL S. PETERSON sent to a third party cruise line the email attached hereto as Exhibit 7, where he offered Plaintiffs' clients to the third party cruise line without Plaintiffs' authorization. This was a tortious interference with Plaintiffs' advantageous business

relationships with their clients. It was also a conversion of the name Life at Sea Cruises in that PETERSON used the name as his own in the email without authorization from Plaintiffs.

10. On April 12, 2023, MIKAEL S. PETERSON organized by filing with the Florida Department of State FOURNEAU MANAGEMENT LLC. The filed Articles of Organization are attached hereto as Exhibit 8, and the current online Detail by Entity Name is attached hereto as Exhibit 9.
11. On April 17, 2023, LIFE AT SEA CRUISES, INC., registered as its trademark in Florida the name LIFE AT SEA CRUISES. The trademark filing is attached hereto as Exhibit 10, and the current online Detail by Trademark Name is attached hereto as Exhibit 11.
12. On or about May 21, 2023, MIKAEL S. PETERSON blocked Plaintiffs from the following online accounts that were paid by Plaintiffs and used by Plaintiffs to communicate with their clients:

- Circle
- Hubspot
- Aircall
- Mobipaid
- SMS Sakari
- Yumpu
- Zoom
- Bamboo HR
- Google Ads
- PandaDoc
- Upwork

This was a tortious interference by PETERSON with Plaintiffs' advantageous business relationships with their clients.

13. The emails attached hereto as Exhibit 12, dated May 21, 2023, show the damage that the false and defamatory statements published by MIKAEL S. PETTERSON have caused to the advantageous business relationships of Plaintiffs with their clients.
14. On May 21, 2023, MIKAEL S. PETTERSON published online to Plaintiffs' clients Exhibit 13 attached hereto, where he converted to his own use the trademark name Life at Sea Cruises and made false and defamatory statements about Plaintiffs. The entire post is a false and defamatory diatribe. All statements therein are false.
15. From May 21 to June 7, 2023, MIKAEL S. PETTERSON, engaged with a client of Plaintiffs in the emails attached hereto as Exhibit 14, where he made false and defamatory statements about Plaintiffs and tortuously interfered with Plaintiffs' advantageous business relationship with this client.
16. On May 22, 2023, MIKAEL S. PETTERSON posted online in Facebook Exhibit 15 attached hereto, where he made false and defamatory statements about Plaintiffs to Plaintiffs clients.
17. On May 22, 2023, MIKAEL S. PETTERSON posted online in Facebook Exhibit 16 attached hereto, where he converted to his own use the trademark name Life at Sea Cruises and made false and defamatory statements about Plaintiffs to Plaintiffs' clients.
18. On May 22, 2023, MIKAEL S. PETTERSON posted online in Facebook Exhibit 17 attached hereto, where he converted to his own use the

trademark name Life at Sea Cruises and made false and defamatory statements about Plaintiffs to Plaintiffs' clients. The entire post is a false and defamatory diatribe. All statements therein are false.

19. MIKAEL S. PETTERSON instigated with false and defamatory statements about Plaintiffs a CNN article that was first published on May 25, 2023, and updated on May 26, 2023, attached hereto as Exhibits 18 and 19, respectively.

20. On June 4, 2023, MIKAEL S. PETTERSON falsely posted online on LinkedIn that he had been promoted to Founder at Life at Sea Cruises. The post is attached hereto as Exhibit 20. In doing so, he converted to his own use the trademark name Life at Sea Cruises and tortiously interfered with Plaintiffs' advantageous business relationships with their clients.

21. On June 7, 2023, MIKAEL S. PETTERSON posted online and directed to Plaintiffs' client the attached Exhibit 21, where he made false and defamatory statements about Plaintiffs.

22. On or about June 14, 2023, MIKAEL S. PETTERSON converted the Facebook account that Plaintiffs had under the trademark name Life at Sea Cruises, where all of Plaintiffs' clients connected, to his own and changed its name to "LAS Founders Page & Community Information."

23. On or about June 14, 2023, MIKAEL S. PETTERSON destroyed the online cruise itinerary link of Plaintiffs.

24. On or about June 14, 2023, MIKAEL S. PETERSON downloaded and converted proprietary contractual forms of Plaintiffs.
25. On June 19, 2023, MIKAEL S. PETERSON had an active Facebook page directed at Plaintiffs clients. The Facebook cover page is attached hereto as Exhibit 22.
26. On June 21, 2023, MIKAEL S. PETERSON posted online the statements attached hereto as Exhibit 23, where he utilizes the trademark name LIFE AT SEA CRUISES and makes false claims about the founders thereof.
27. On June 21, 2023, MIKAEL S. PETERSON subscribed to the email attached hereto as Exhibit 24, which was sent to email addresses in the lists of Plaintiffs' clients, which lists MIKAEL S. PETERSON converted to his own use without authorization from Plaintiffs.
28. Plaintiffs have suffered economic loses, loss of business and loss of good name, will and reputation as a direct and proximate result of the conversion, defamation, tortious interference and trademark infringement made by MIKAEL S. PETERSON.
29. All the attachments hereto are known by me of personal knowledge to be true and correct copies of their originals.

And so that it be known, I subscribe the present.

Kendra Holmes

State of Florida
County of _____

Sworn-to and subscribed before me on _____, 2023, by
Kendra Holmes, who I personally know or has produced the following
identification: _____.

Notary Public – State of Florida

NOT AN OFFICIAL COPY - PUBLIC ACCESS - NOT AN OFFICIAL COPY
NOT AN OFFICIAL COPY - PUBLIC ACCESS - NOT AN OFFICIAL COPY
NOT AN OFFICIAL COPY - PUBLIC ACCESS - NOT AN OFFICIAL COPY

24. On or about June 14, 2023, MIKAEL S. PETERSON downloaded and converted proprietary contractual forms of Plaintiffs.
25. On June 19, 2023, MIKAEL S. PETERSON had an active Facebook page directed at Plaintiffs clients. The Facebook cover page is attached hereto as Exhibit 22.
26. On June 21, 2023, MIKAEL S. PETERSON posted online the statements attached hereto as Exhibit 23, where he utilizes the trademark name LIFE AT SEA CRUISES and makes false claims about the founders thereof.
27. On June 21, 2023, MIKAEL S. PETERSON subscribed to the email attached hereto as Exhibit 24, which was sent to email addresses in the lists of Plaintiffs' clients, which lists MIKAEL S. PETERSON converted to his own use without authorization from Plaintiffs.
28. Plaintiffs have suffered economic loses, loss of business and loss of good name, will and reputation as a direct and proximate result of the conversion, defamation, tortious interference and trademark infringement made by MIKAEL S. PETERSON.
29. All the attachments hereto are known by me of personal knowledge to be true and correct copies of their originals.

And so that it be known, I subscribe the present.

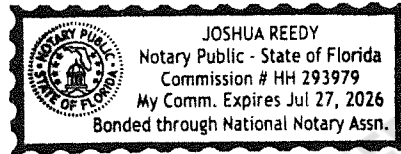


Kendra Holmes

State of Florida
County of Orange

Sworn-to and subscribed before me on June 28th, 2023, by
Kendra Holmes, who I personally know or has produced the following
identification: FL Driver License.

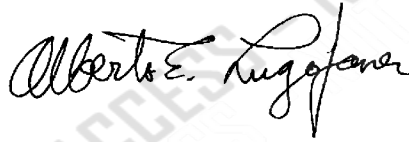
Joshua Reedy
Notary Public – State of Florida



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I HEREBY CERTIFY that this document with its exhibits was e-filed today through the Florida Courts E-Filing Portal, which will serve the same on all counsel of record, and that copy of the same with its exhibits was mailed and emailed today to:

Mikael S. Petterson
individually and as Registered Agent for
Fourneau International LLC
Fourneau Management LLC
12266 NW 10th Street
Pembroke Pines, FL 33026
mikepetterson@yahoo.com



June 30, 2023

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