



132 S. RODEO DRIVE, FOURTH FLOOR
BEVERLY HILLS, CA 90212
424.203.1600 • WWW.HMAFIRM.COM

August 21, 2016

VIA E-MAIL AND MAIL

LiberalAmerica.org
c/o Tiff, ink LLC
P.O. Box 266
Kaufman, Texas 75162
editor@liberalamerica.org

Re: Melania Trump – Demand for Retraction and Apology

Dear Liberal America:

This law firm is litigation counsel for Melania Trump. We write in connection with the many libelous statements in the story published on or about August 21, 2016 bearing the headline “BREAKING REPORT: Melania Trump Was A Sex Worker After Moving To United States” located at the URL address: <http://www.liberalamerica.org/2016/08/21/report-melania-trump-sex-worker-moving-united-states/> (the “Story”).

The following statements in the Story, among others, are false and defamatory, and therefore, we demand that you immediately and permanently remove each of these statements from the Story, and print a full and complete retraction and apology, with as prominent placement as the original Story:

1. “Melania Trump Was A Sex Worker After Moving To United States”
2. “Melania Trump, the current wife of the GOP nominee for the White House, worked as an escort shortly after she first moved to the United States and was a favorite of rich men such as her current husband.”
3. “On the one hand, they [the girls] pretended to be models, but they principally earned money as elite escorts. They even had two composite cards (presentation cards held by each model) — with two photos and basic information such as measurements, eye and hair color, and agency details.”
4. “The second card...listed whether or not the woman liked older men and what her sexual skills in the bedroom were.”
5. “The modeling agency Melania signed with after arriving in New York was owned by Paolo Zampolli, who allegedly used the agency as a front for an escort service.”

August 21, 2016

Re: Melania Trump – Demand for Retraction and Apology

Page 2

The true facts are as follows: Mrs. Trump **never** worked as an escort or sex worker, nor did she ever have a composite or presentation card for the sex business. Mrs. Trump had a single composite card – for modeling. Paolo Zampolli, Mrs. Trump’s former modeling agent, has vehemently and publicly denied allegations that he operated a sex business.

Your publication of the defamatory statements above constitutes, among other claims: libel *per se*, false light invasion of privacy, and intentional infliction of emotional distress. Remedies for your legal violations include, among others, actual damages, special damages, punitive damages, and temporary and permanent injunctive relief. Actual malice can be proven by nature of the fact that my client has publicly denied the foregoing statements, and her denial has been published in other publications. In addition, this letter constitutes direct notice of the false and defamatory nature of the foregoing statements, and actual malice can easily be proven, particularly for any continued publication.

Please confirm in writing **within twenty-four (24) hours** of the transmission of this letter that the foregoing demands will be, and are being, fully complied with. Failure to do so will leave my client with no alternative but to institute immediate legal proceedings against you and, should that occur, she would pursue all available causes of action and seek all available legal remedies to the maximum extent permitted by law. Please govern yourselves accordingly.

This letter is not intended as a full or complete statement of all relevant facts or applicable law, and nothing herein is intended as, nor should it be deemed to constitute, a waiver or relinquishment of any of my client’s rights, remedies, claims or causes of action, all of which are hereby expressly reserved.

Very truly yours,



CHARLES J. HARDER Of
HARDER MIRELL & ABRAMS LLP

cc: Mrs. Melania Trump