

**EXHIBIT A**

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October 15, 2025

Via Email

Mr. Michael Wolff
michael.wolff@gmail.com

**Re: Demand to Retract the False, Defamatory, and Lewd
Statements about The First Lady of the United States of America**

Dear Mr. Wolff:

This law firm serves as litigation counsel for The First Lady of the United States of America Mrs. Melania Trump (hereinafter referred to as “Mrs. Trump”). Please direct all future correspondence relating to this matter to my attention. This correspondence serves as a demand under Florida Statute § 770.01¹ that you immediately retract and apologize for the false, defamatory, disparaging, and inflammatory statements made about Mrs. Trump, which were published by The Daily Beast Company, LLC (“The Daily Beast”), and contained in the article titled “Melania Trump ‘Very Involved’ in Epstein Scandal: Author” (the “Article”). Failure to comply will leave Mrs. Trump with no choice but to pursue any and all legal rights and remedies available to recover the overwhelming financial and reputational harm that you have caused her to suffer.

A. The Article’s defamatory statements.

Here are the false statements in the Article that were made by you, which are defamatory *per se* and which were published by The Daily Beast:

- a. *“Melania Trump ‘Very Involved’ in Epstein Scandal: Author.”*
- b. *“First Lady Melania could be the missing link in President Trump’s ties to convicted sex offender Jeffrey Epstein.”*
- c. *“Melania was ‘very involved’ in Epstein’s social circle, and noted that this is how she met Trump.”*
- d. *“She’s introduced by a model agent, both of whom Trump and Epstein are involved with. She’s introduced to Trump that way. Epstein [knew] her well.”*

Here are the following statements in the Article that are implicitly defamatory:

¹ Mrs. Trump does not agree or admit that only Florida law applies to any claims she might have in connection with or arising out of the Article.

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- a. "In explosive tapes recorded by Wolff, Epstein alleged that *Trump liked to 'f-- his friends' wives and first slept with Melania on his 'Lolita Express.'*"
- b. "Where does [Melania] fit into the Epstein story? *Where does she fit into this, into this whole culture of models of indeterminate age?*"

Separately, you have disseminated such false and defamatory statements on your Instagram page, which have exacerbated this already caustic situation, as follows:

1. Instagram dated July 28, 2025: https://www.instagram.com/reel/DMp1D1_uCM3/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWF1ZA==

- "Epstein told [you], that Trump and Melania got together for the first time [] on Epstein's airplane," and that "Melania met Trump through the same modeling circles through which Epstein and Trump procured dates."
- "This sham marriage, trophy marriage, hardly any marriage at all is part of the scam."
- "The Epstein story, in which Melania plays no small part."

2. Instagram dated August 4, 2025: https://www.instagram.com/reel/DM7_VSOOnH2/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWF1ZA==

- "Where does Melanie fit in with Epstein?"

3. Instagram dated August 14, 2025: https://www.instagram.com/reel/DNVsVxLue_s/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWF1ZA==

- You stated that Mrs. Trump is sending letters threatening to sue anyone who makes the connection between her and Epstein because they are hiding something they don't want us to know.

These false, disparaging, defamatory, and inflammatory statements are extremely salacious and have been widely disseminated throughout various digital mediums, which have reached tens of millions of people worldwide. Consequently, you have caused Mrs. Trump to suffer overwhelming financial and reputational harm.

As you likely are aware, in July and August 2025, The Daily Beast and podcast platform Spotify removed stories and episodes related to your false and defamatory claims. The Daily Beast also issued two apologies to Mrs. Trump, which specifically referenced your false statements. Separately, James Carville issued an apology and a retraction for a podcast segment in which he made similar false claims about Mrs. Trump, basing them on your untruths. Just in the last week,



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publisher HarperCollins UK also apologized, retracted, and removed similar incorrect claims from a book. These myriad retractions and apologies underscore the obvious falsity and tortious nature of the statements that you made, and which media outlets are not willing to support or endorse given the liability that they have been exposed to by publishing your false and defamatory statements. It is now your time to directly address your own misdeeds and unlawful conduct.

B. Applicable law.

Whether defamation is *per se* or *per quod*, both are actionable under New York and Florida law. “In New York, there are two types of defamation: (1) express defamation, which involves false statements, and (2) defamation by implication, which “involves ‘false suggestions, impressions and implications arising from otherwise truthful statements[.]’” *Veritas v. Cable News Network, Inc.*, 121 F.4th 1267, 1275–76 (11th Cir. 2024) (reversing dismissal of complaint because it stated defamation by implication claims against CNN) (quoting *Levin v. McPhee*, 119 F.3d 189, 196 n.5 (2d Cir. 1997)). Florida law also recognizes causes of action for both defamation *per se* and defamation *per quod*. See *Jews For Jesus, Inc. v. Rapp*, 997 So. 2d 1098, 1106 (Fla. 2008).

Even if you attempted to whitewash your conduct as simply an expression of your opinions, Florida law makes clear that such a defense will not absolve your liability. See *Dershowitz v. Cable News Network, Inc.*, 541 F. Supp. 3d 1354, 1362 (S.D. Fla. 2021); see also *Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 18-19 (1990) (“Even if the speaker states the facts upon which he bases his opinion, if those facts are either incorrect or incomplete, or if his assessment of them is erroneous, the statement may still imply a false assertion of fact. ***Simply couching such statements in terms of opinion does not dispel these implications.***”) (emphasis added); see also *Eastern Air Lines, Inc. v. Gellert*, 438 So. 2d 923, 927 (Fla. 3d DCA 1983) (“***[A] statement that although ostensibly in the form of an opinion ‘implies the allegation of undisclosed defamatory facts as the basis for the opinion’ is actionable.***”) (emphasis added).

The conclusion is the same under New York law. See *Garcia v. Puccio*, 17 A.D.3d 199, 201, 793 N.Y.S.2d 382, 384 (2005) (affirming denial of motion to dismiss defamation by implication claim: “It would be error to give conclusive effect to defendants’ position of truthfulness before any affirmative defense to that effect has been raised in their answer[.]”); see also *Davis v. Brown*, 211 A.D.3d 524, 525, 181 N.Y.S.3d 34, 35 (2022) (affirming denial of motion to dismiss defamation by implication claim: “While a pure opinion cannot be the subject of a defamation claim, an opinion that ‘implies that it is based upon facts which justify the opinion but are unknown to those reading or hearing it, ... is a ‘mixed opinion’ and is actionable[.]’”) (quoting *Davis v. Boenheim*, 24 N.Y.3d 262, 269 22 N.E.3d 999 (2014)).

Your statements are also defamatory *per se* because they wrongly portray Mrs. Trump as a central figure in the mainstream media’s ongoing saga to falsely and maliciously intertwine President Trump and the deceased—and disgraced—Jeffrey Epstein. This is the antithesis of what the fair-index privilege allows. See *Kesner v. Dow Jones & Co., Inc.*, 515 F. Supp. 3d 149, 172 (S.D.N.Y. 2021) (cited only to explain applicable standard) (“A publication ‘need not choose the

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most delicate word available in constructing its headline; it is permitted some drama in grabbing its reader's attention, so long as the headline remains a fair index of what is accurately reported below.”) (quoting *Test Masters Educ. Servs., Inc. v. NYP Holdings, Inc.*, 603 F. Supp. 2d 584, 589 (S.D.N.Y. 2009)).

Consequently, you lack any viable defense to the overwhelming reputational and financial harm you have caused Mrs. Trump to suffer.

C. Demand.

The above-referenced false, defamatory, malicious, disparaging, and inflammatory statements were published to deliberately denigrate Mrs. Trump. The timing of your statements and the subsequent publication of the Article is evident and underscores the actual malice behind the decision to make these statements given the plain falsity of the statements. Accordingly, Mrs. Trump hereby demands that you: (1) immediately issue a full and fair retraction of the statements made about her in Article and any and all other false, defamatory, disparaging, misleading, and inflammatory statements about Mrs. Trump in as conspicuous a manner as they were originally published; (2) immediately issue an apology for the false, defamatory, disparaging, misleading, and inflammatory statements about Mrs. Trump; and (3) immediately make a monetary proposal to Mrs. Trump to ameliorate the harm that you have caused.

Moreover, please allow this letter to serve as notice to you, your affiliated entities, subsidiaries, to its employees, and any other person acting on behalf of or in concert with you, to preserve any and all evidence related in any way to the above-mentioned malicious, false, and defamatory statements you published, and any other statements that you have published regarding Mrs. Trump. By way of this letter, you are hereby directed not to destroy, conceal, or alter any paper or electronic files, physical evidence, and/or other data relating in any way, no matter how remote, to your false claims regarding Mrs. Trump, and/or the circumstances leading to their dissemination, including, but not limited to: (1) all communications between you and any third party in any way related to your wrongful claims regarding Mrs. Trump; (2) all sources for your false claims regarding Mrs. Trump; (3) any and all documents and data referring to, reflecting, or relating to communications between you and any such third-parties or sources regarding your false claims regarding Mrs. Trump; and (4) any and all documents in any way related to your false claims regarding Mrs. Trump. This includes any information alleged to be protected by N.Y. Civ. Rights Law § 79-h(c) or Florida Statute § 90.5015. *See PPM Am., Inc. v. Marriott Corp.*, 152 F.R.D. 32, 35–36 (S.D.N.Y. 1993) (interpreting N.Y. Civ. Rights Law § 79-h(c)); *see also Monarch Air Group, LLC v. Journalism Dev. Network, Inc.*, No. 23-CV-61256, 2025 WL 445491, at *1 (S.D. Fla. Feb. 10, 2025) (interpreting Fla. Stat. § 90.5015 and explaining that the Eleventh Circuit “recognizes a qualified privilege for journalists, allowing them to resist compelled disclosure of their professional news gathering efforts. This privilege shields reporters in both criminal and civil proceedings.”) (quoting *United States v. Capers*, 708 F.3d 1286, 1303 (11th Cir. 2013)).

NYSCEF DOC. NO. 2

RECEIVED NYSCEF: 10/21/2025

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I understand that many records and files are maintained electronically. However, this letter specifically requests that all paper and hard copy originals be maintained and preserved in their original format. By the same token, electronic documents and the storage media on which they reside may contain relevant, discoverable information beyond that which may be found in printed documents. Therefore, even where a paper copy exists and has been preserved, please preserve and maintain all electronically stored documents in their original native format, including all metadata. This preservation demand specifically encompasses any and all electronic documents, including but not limited to, all word-processed files, emails, spreadsheets, all databases, log files, and any other electronically stored and/or generated documents or files.

If you do not comply with the above by **October 21, 2025, at 5:00 p.m. EST**, Mrs. Trump will be left with no alternative but to enforce her legal and equitable rights, all of which are expressly reserved and are not waived, including by filing legal action for over \$1 Billion Dollars in damages. You are on notice.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Alejandro Brito", with a large, stylized flourish at the end.

ALEJANDRO BRITO