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August 6, 2025

Via Email and Federal Express

Mr. Hunter Biden
c/o Abbe David Lowell, Esq.
Lowell and Associates, PLLC
1250 H Street NW
Suite 250
Washington, DC 20005
inquiries@lowellandassociates.com

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

Dear Mr. Biden:

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 the false, defamatory, disparaging, and inflammatory statements made about Mrs. Trump, which are contained in the video published on YouTube on August 5, 2025, titled "Hunter Biden Returns" ("Video").² Failure to comply will leave Mrs. Trump with no choice but to pursue any and all legal rights and remedies available to her to recover the overwhelming financial and reputational harm that you have caused her to suffer.

A. The Video's defamatory statements.

Here are the false statements in the Video that are defamatory *per se*:

- a. *"Epstein introduced Melania to Trump. The connections are, like, so wide and deep."*
- b. *"Jeffrey Epstein introduced Melania, that's how Melania and the First Lady and the President met. Really? Epstein made the intro? Yeah, according to Michael Wolff."*

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.

² "Hunter Biden Returns" CHANNEL 5 WITH ANDREW CALLAGHAN, YOUTUBE (August 5, 2025) (<https://www.youtube.com/watch?v=K4WCtYDtgbM>).



These false, disparaging, defamatory, and inflammatory statements are extremely salacious and have been widely disseminated throughout various digital mediums. Indeed, the Video has since been re-published by various media outlets, journalists, and political commentators with millions of social media followers³ that have disseminated the false and defamatory statements therein to tens of millions of people worldwide. Consequently, you have caused Mrs. Trump to suffer overwhelming financial and reputational harm.

Moreover, the source of your false, disparaging, defamatory, and inflammatory statements is serial fabulist Michael Wolff, whose lies were published by The Daily Beast in the article titled “Melania Trump ‘Very Involved’ in Epstein Scandal: Author” (“Article”). Following receipt of our cease-and-desist demand letter just a week ago, The Daily Beast issued an apology to Mrs. Trump and retracted the false and defamatory statements contained in the Article by deleting it in its entirety. Despite this, you have unjustifiably relied upon Mr. Wolff’s false, defamatory, disparaging, and inflammatory statements about Mrs. Trump and maliciously elected to republish them.

B. Applicable law.

Whether defamation is *per se* or *per quod*, both are actionable under New York and Florida law. New York law recognizes “express defamation, which involves false statements,” and 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 attempt 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***

³ @_johnnymaga (over 164,000 followers) X.COM (published August 5, 2025) (https://x.com/_johnnymaga/status/1952744951994810381); @greg_price11 (over 484,000 followers) X.COM (published August 5, 2025) (https://x.com/greg_price11/status/1952741871492513820); @mirandadevine (over 825,000 followers) X.COM (published August 5, 2025) (<https://x.com/mirandadevine/status/1952771293243134375>); “Hunter Biden shares false claim Epstein introduced first lady to Trump” WASHINGTON EXAMINER (August 5, 2025) (<https://www.washingtonexaminer.com/news/3491570/hunter-biden-false-claim-jeffery-epstein-introduced-melania-to-trump/>);



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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)).

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 this Video is evident and underscores the actual malice behind the decision to publish it given the plain falsity of the statements. Given your vast history of trading on the names of others—including your surname—for your personal benefit, it is obvious that you published these false and defamatory statements about Mrs. Trump to draw attention to yourself.

Accordingly, Mrs. Trump hereby demands that you: (1) immediately issue a full and fair retraction of the Video 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; and (2) immediately issue an apology for the false, defamatory, disparaging, misleading, and inflammatory statements about Mrs. Trump.

Moreover, please allow this letter to serve as notice to you, to your affiliated entities, subsidiaries, to your employees, and any other person acting on your behalf 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



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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.

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 **August 7, 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 be "Alejandro Brito", written over a horizontal line.

ALEJANDRO BRITO