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October 30, 2017

VIA E-MAIL TO CHARLES COUGER

Tucker Carlson  
Fox News Channel  
1211 Avenue of the Americas, 2nd Floor  
New York, NY 10036  
T: (212) 301-3000

Re: Mr. Podesta and the Podesta Group

Dear Mr. Carlson:

This law firm represents Anthony Podesta, Chairman of the Podesta Group. On behalf of Mr. Podesta, I write to demand that you and Fox News Channel immediately cease and desist disseminating false and misleading reports about Mr. Podesta and the Podesta Group. In particular, your statements about Mr. Podesta and Podesta Group made during Tucker Carlson Tonight on October 24 and 25, 2017 are provably false and misleading and are defamatory.

The European Centre for a Modern Ukraine ("ECFMU"), a non-profit organization, retained the Podesta Group to advocate for Ukraine's turn to the West and to enter into an Association Agreement with the EU. The ECFMU provided the Podesta Group with a formal certification that it was neither funded by nor directed by a foreign government or political party. Based on the certification and advice of in-house and outside counsel, the Podesta Group fully disclosed its representation of the ECFMU, and complied with Foreign Agents Registration Act by filing under the Lobbying Disclosure Act. This representation was further disclosed in eight subsequent public filings. Paul Manafort did not work with the Podesta Group in its representation of the ECFMU. Further, Mr. Manafort did not regularly attend meetings at the Podesta Group. The Podesta Group has fully cooperated with the Special Counsel's office and taken every possible step to provide documentation that confirms compliance with the law.

You and Fox News Channel have disseminated false and misleading reports about Mr. Podesta and the Podesta Group. Your report propagated falsehoods, such as: (1) Mr. Manafort was seen in the Podesta Group's offices "once a month" (2) Mr. Manafort and the Podesta Group worked for the Russian Government through Podesta Group's representation of the European Centre for a Modern Ukraine (ECFMU), and (3) the Podesta Group's client, the ECFMU, was a "sham" organization. Your statements are fabricated and demonstrate a callous disregard for the truth.

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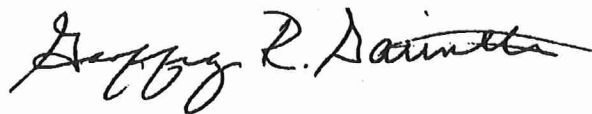
Your false and defamatory statements have caused damage and injury to the reputation of Mr. Podesta and the Podesta Group. Many of the false statements are so obviously false or so easily subject to investigation that it is apparent that you and Fox News Channel disseminated the false and defamatory statements either knowingly or with reckless disregard for whether the statements were true or not. You and Fox News Channel have an independent and non-delegable duty to conduct a reasonable investigation of the information you publish and disseminate and the failure to do so is a violation of law and the rights of those targeted by such unfounded allegations. You and Fox News Channel are not shielded from liability by conveniently disseminating the story as the account of an undisclosed third party. The obligation to investigate is indeed non-delegable and independent, and should be held inviolate by any credible news organization.

Venable LLP, on behalf of Mr. Podesta, demands that you and Fox News Channel: (i) immediately issue a retraction that is of equal prominence to the reports by no later than Friday, November 3, 2017, (ii) remove the story from all media sources, and (iii) cease and desist from disseminating false and misleading statements about Mr. Podesta and the Podesta Group. Please confirm in writing within three business days of receipt of this letter that you will immediately take these steps. If you do not supply such written confirmation, Mr. Podesta may pursue legal action, including for damages, in order to fully protect his rights.

This letter does not constitute a complete or exhaustive statement of all of Mr. Podesta's rights, claims, contentions or legal theories. Nothing stated herein is intended to nor should be deemed to constitute a waiver or relinquishment of any of Mr. Podesta's rights or remedies, whether legal or equitable, all of which are hereby expressly reserved.

This is a confidential legal notice and is not for publication. Any publication, dissemination or broadcast of any portion of this letter will constitute a breach of confidence and a violation of Copyright Act. You are not authorized to publish this letter in whole or in part absent our express written authorization.

Sincerely yours,



Geoffrey Garinther

cc: Anthony Podesta