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November 16, 2017

VIA E-MAIL: trent@garmonlawfirm.com

Trenton Garmon, Esq.
The Garmon Law Firm, LLC
750 Forrest Avenue
Gadsden, Alabama 35901-3639

**Re: Response to November 14, 2017 Correspondence Concerning Roy Moore,
Kayla Moore, and The Foundation for Moral Law**

Dear Mr. Garmon:

I am writing on behalf of the Alabama Media Group (“AMG”), which publishes AL.com, in response to your November 14, 2017 letter. You have (now twice) threatened to sue AMG and AL.com concerning AL.com’s recent reporting about Roy Moore, Kayla Moore, and their Foundation for Moral Law. You have accused AL.com of making “false reports and/or careless reporting” about multiple subjects related to your clients. Your letter demands that AL.com retract and recant its prior stories and that it “cease and desist” from any further reporting about your clients.

AL.com hereby rejects your demand. AL.com stands by its reporting regarding all of the matters addressed in your letter.¹ AL.com has reported on newsworthy matters of significant public concern regarding your clients. Roy Moore is now, and for decades has been, a public figure. He is now running for a seat in the United States Senate. He is asking the people of Alabama to financially support his campaign and his Foundation (headed by Mrs. Moore), and to vote for him. Alabamians – for that matter, all Americans – have a right to know about the individuals who wish to represent them in public office. Like every political candidate, Mr. Moore is subject to scrutiny and analysis by the media and the general public regarding his fitness for public office. AL.com’s reporting has provided the public with important information directly relevant to that inquiry.

You accuse AL.com of defamation in purely conclusory fashion. You have not explained how anything that AL.com reported is untrue, inaccurate, or erroneous, nor do you provide any support for your position. You have also not shown that AL.com reported any of its stories with actual malice, as you know you must because your clients are public figures (a point you have

¹ To the extent that your letter re-states the issues that you previously raised in your November 7, 2017 email concerning the Moores and the Foundation, we direct you to our prior response, and we stand by it as well.

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admitted in in recent television interviews). To the contrary, an ever-increasing torrent of accusers and journalist investigators have publicly verified the facts reported by AL.com.

Your letter goes on to say that AL.com's reporting has harmed Mr. Moore's reputation. Mr. Moore, however, has quite a colorful past that long-preceded any of AL.com's recent coverage of your clients. Moreover, much of the information that you claim harmed Mr. Moore's reputation had already been published by those who know him personally and reported by other media outlets. In other words, any damage to Mr. Moore's reputation was self-inflicted and had already occurred long before AL.com's recent reporting.

For these and other reasons, we strongly believe that any lawsuit of the type you threaten would be frivolous, and could not be brought in good faith. Should your clients nevertheless decide to pursue this matter further, AL.com will vigorously defend itself, and will employ all available remedies, including a Rule 11 motion if warranted. We are confident that litigation would not only demonstrate that AL.com exercised the utmost diligence and employed high journalistic standards in reporting these stories, but would also reveal other important information about your clients.

We are hereby putting your clients on notice of their duty to preserve and maintain all materials, documents, writings, recordings, statements, notes, letters, journals, diaries, calendars, emails, photographs, videos, computers, cell phones, electronic data, and other information that is or could remotely be relevant in any manner to any of the claims that you have made. These include, but are not limited to, all materials and information related to Mr. Moore's history of romantic relationships or physical encounters (whether consensual or not); your clients' fundraising, compensation, and finances; and Mr. Moore's speaking engagements, travel arrangements, and other expenses. As you know, failure to preserve any such materials may expose your clients to sanctions.

If you would like to discuss these matters any further, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "John G. Thompson, Jr.", written in a cursive style.

John G. Thompson, Jr.

JGTjr/llt

cc via e-mail: J. Banks Sewell, Esq.