



CNN
Worldwide

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June 10, 2020

Sent Via Electronic Mail

Jenna Ellis, Esq.
Senior Legal Adviser
Donald J. Trump for President, Inc

Re: CNN POLL

Dear Ms. Ellis,

This responds to your letter dated June 9, 2020.

To my knowledge, this is the first time in its 40 year history that CNN had been threatened with legal action because an American politician or campaign did not like CNN's polling results.

To the extent we have received legal threats from political leaders in the past, they have typically come from countries like Venezuela or other regimes where there is little or no respect for a free and independent media.

CNN is well aware of the reputation John McLaughlin and McLaughlin & Associates. In 2014 his firm famously reported that Eric Cantor was leading his primary challenger Dave Brat by 34 points only to lose by 11 points - a 45 point swing. The firm currently has a C/D rating from FiveThirtyEight.

In any event, McLaughlin was able to evaluate and criticize CNN's most recent poll because CNN is transparent and publishes its methodology along with its polling results. Because of this, McLaughlin was free to publish his own critique of CNN's analysis and share his criticisms across the U.S. media landscape. That's how free speech works. It's the American way.



Your letter is factually and legally baseless. It is yet another bad faith attempt by the campaign to threaten litigation to muzzle speech it does not want voters to read or hear. Your allegations and demands are rejected in their entirety.

Very Truly Yours,

David C. Vigilante

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