

MILLER BARONDESS, LLP

ATTORNEYS AT LAW  
1999 AVENUE OF THE STARS  
SUITE 1000  
LOS ANGELES, CALIFORNIA 90067  
TEL: (310) 552-4400  
FAX: (310) 552-8400  
WWW.MILLERBARONDESS.COM

July 25, 2019

LOUIS R. MILLER  
DIRECT DIAL: (310) 552-5251  
SMILLER@MILLERBARONDESS.COM

*VIA CERTIFIED MAIL*

Brian Roberts  
Comcast Corporation  
Comcast Center  
1701 John F. Kennedy Blvd.  
Philadelphia, PA 19103

Re: Notice to Retract Defamatory Statements Regarding One America News Network

Mr. Roberts:

Please be advised that our firm has been retained by One America News Network (“OAN”) concerning the July 22, 2019 episode of the Rachel Maddow Show, in which Rachel Maddow maliciously slandered OAN. I am writing to you as the top executive responsible for MSNBC. This letter serves as a demand that MSNBC, by and through Rachel Maddow and/or otherwise, publicly correct her defamatory statements in accordance with California Civil Code § 48a.

Maddow falsely claimed—without a shred of evidence—that OAN “really literally is paid Russian propaganda.” That is false. OAN has never received a single penny from the Russian government. The assertion that OAN is paid to disseminate propaganda on behalf of a foreign government is more than a mere falsehood—it amounts to an accusation of treason. Maddow’s comments were beyond the pale and unbecoming of any respectable news organization.

It also appears that the unwarranted attack on OAN was retaliation for OAN’s suggestion that Comcast is refusing to carry it for non-business reasons. On July 15, 2019, Charles Herring emailed Gregory Rigdon, the President of Content Acquisition for Comcast. Herring made the compelling business case for adding OAN and also stated his concern that Comcast is refusing to carry OAN because OAN’s coverage “generally counters the voice of MSNBC.” Exactly one week after that email, MSNBC’s number one show opens with a hit piece on OAN. This does not appear to be a mere coincidence. Tellingly, nobody at MSNBC or Comcast made any effort to reach out to OAN for comment prior to airing the defamatory statements.

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Here are the facts: OAN is an independent and family-owned media company focused on providing national and international news coverage. OAN is solely owned and operated by Herring Networks, Inc., which in turn is wholly-owned by members of the Herring family. The Herrings are a proud, dedicated and loyal American family. They launched OAN on July 4, 2013, to deliver timely national and international news 24 hours a day.

OAN features political analysis programming, political talk shows, and special documentary-style reports. In just a few years, OAN has become the fourth-highest rated national news network as measured by a leading cable provider and is greatly outperforming other emerging cable news networks. The Herrings launched OAN on their own and with their own money. They took no outside investment whatsoever and have never had any involvement with the Russian government.

The malicious claim that OAN is a Russian propaganda operation is vile, sensationalistic reporting. MSNBC and Ms. Maddow should immediately retract this defamatory statement.

Kristian Rouz, the young man whom Maddow attacked, is employed by OAN as a news aggregator. His job is to collect and analyze articles from other sources and write articles based on those sources. He is paid by OAN—not the Russian government—for the content he creates for OAN. Every article he writes goes through OAN's editorial process. Mr. Rouz has never had decision-making authority with respect to the content that is aired on OAN. His outside work for other media outlets has no relation to—or bearing on—his work for OAN.

In her zeal, we think Ms. Maddow singled out Mr. Rouz because of his nationality and sought to malign him because she thought he is from Russia; in fact, he was born in the Ukraine. If she had taken a minute to check Mr. Rouz out, she would have found that contrary to her false and discriminatory accusation, he is a hard-working, honest journalist trying to earn a living and support himself. In that regard, I attach for your information a statement signed by Mr. Rouz and request that you instruct Ms. Maddow to check people out before she seeks to destroy their livelihood.

The falsehoods disseminated by Ms. Maddow are even more problematic considering that the Daily Beast article on which the episode was based was authored by Kevin Poulsen, also known as “Dark Dante”—the first computer hacker ever to be charged with espionage against the United States government. Rather than face the charges against him, Poulsen spent 17 months as a fugitive from the law before being arrested in 1991.

In 1995, Mr. Poulson pleaded guilty to seven counts of conspiracy, fraud, and intercepting wire communications. He received the longest sentence ever for a computer hacker at that time. United States law enforcement has referred to him as “the Hannibal Lecter of computer crime.” Of course, Ms. Maddow made no mention of the shadowy source of the article

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in her statements; instead, she made it seem like the story written by Mr. Poulsen came from a credible news source.

Maddow's assertion that OAN is a Russian propaganda operation is utterly false and defamatory. Our client will not stand by and allow these lies to be disseminated.

We hereby demand that you:

1. Immediately cease and desist in publishing defamatory statements about our client, whether the statements are made by you or by third parties;
2. Issue a public retraction of the defamatory statements, making clear that OAN is not paid Russian propaganda;

This letter puts you on notice that should you refuse to comply with our demands by August 15, 2019, we will recommend that our client pursue all legal avenues to protect its interests, including damages and attorneys' fees and costs incurred as a result of your actions. We reserve all our rights and remedies.

Sincerely,



Louis R. Miller

LRM

cc: Kimberly D. Harris

## Statement on My Writing for Sputnik News

I am not a staff employee of Sputnik News, and have never been;

I have been writing articles for Sputnik about global economics and international finance;

I was free to choose the topics and angles for my articles according to my own views;

I have never written propaganda, disinformation, or unverified information;

I could write whenever I want, as many articles I want – but not exceeding 25 articles per month;

I had approximately 1300 articles over the past 4.5 years at roughly \$40 per article, totaling at some \$11,500 per year;

I wrote these articles to make ends meet and survive – as I had no family or friends in the U.S., and I was unemployed in this country for roughly 2 years.

Kristian Rouz, 7/23/2019

