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**CEASE AND DESIST**

January 13, 2012



Re: **Defamatory Statements concerning Susanna Barrett and Isabella Barrett**

To the above-referenced addressees:

We have been retained as litigation counsel for Susanna Barrett and Isabella Barrett. We write to you regarding the false, defamatory and otherwise factually incorrect statements contained in the articles published on your websites (the "Articles"), and hereby demand an immediate retraction.

The Articles have asserted, including, without limitation, that the Barretts were "partying" at a "nightclub" at 11:00 p.m., and that Isabella Barrett – a five-year-old child – was

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“gyrating” to the music. They further include photographs and video claiming to show that Susanna Barrett was acting as a DJ for her daughter, “pushing her on” and “feeding her the adult lyrics.” Some of the headlines for the Articles include salacious fabrications, including that Isabella Barrett was “performing” a song called “Sexy and I Know It”, that she was “singing about her sex appeal at a New York City bar,” and that the Barretts “hit” a New York City nightclub.

These allegations are demonstrably false, defamatory, and present out-of-context factual assertions that fail to convey the actual event. In point of fact, the Barretts were attending a New York City pet charity fundraiser. Isabella Barrett was not “gyrating” to music. Her mother, Susanna Barrett – who is not the woman depicted in the Articles’ photographs and videos – was not feeding her daughter lyrics or pushing her on. The event took place at 7:00 p.m. and Isabella Barrett had left by 8:30 p.m.

A basic investigation into the facts of the event would have quickly and easily refuted the false allegations in the Articles. Either you failed to undertake even this basic investigation, or you did so and published the Article maliciously.

In either case, the Articles expose the Barretts to contempt and aversion which they do not deserve. We hereby demand that you immediately disable public access to the Articles and publish full retractions.

We are monitoring the media’s evolving treatment of this story. As your Articles and those published by other news outlets are constantly being republished, revised and otherwise altered, additional variations and iterations are appearing by the hour. Accordingly, please be advised that this communication shall not impact upon in any manner, the rights, claims remedies, actions or causes of action which our client has or may have at law, in equity or otherwise, and we expressly reserve all rights and remedies that the Barretts have or may have with respect to this matter.

Very truly yours,  
NESENOFF & MILTENBERG, LLP

By: \_\_\_\_\_

  
Andrew T. Miltenberg, Esq.

Marco A. Santori, Esq.