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September 26, 2011

VIA FACSIMILE (212-940-7408)

Maya Mavjee, Publisher.
Crown Publishing Group
Division of Random House Inc.
1745 Broadway
New York, NY 10019-4343

Dear Ms. Mavjee,

This office represents Governor Sarah Palin. Governor Palin is the subject of a recent book published by Crown Publishing titled, "The Rogue." This book contains a series of lies and rumors presented as fact and combined with "anonymous" sources.

Enclosed is an e-mail by your author Joe McGinniss. In this e-mail, Mr. McGinniss admits that your own lawyers instructed him that "nothing I can cite other than my own reporting rises above the level of tawdry gossip. The proof is always just around the corner, but that is a corner nobody has been able to turn." Mr. McGinniss also notes in the e-mail that he "ran out of time" to properly source his book. The email clearly describes the fact that Mr. McGinniss researched and investigated many false and scurrilous allegations, and concluded there was absolutely no evidence anywhere backing these allegations. Indeed, Mr. McGinniss admits that the allegations are false unless he can find someone or something to show they are true. We know from the final book that he was unable to do so.

It is malicious for your company to publish a book wherein it, and the author, admit that they were fully aware the statements in the book were false, intended to be false, and were intended to harm. The final work that was published contains most of the stories that Mr. McGinniss complains were nothing more than "tawdry gossip" that amounted to the wishful fantasies of disturbed individuals. There is no evidence that Mr. McGinniss somehow magically discovered "new sources" between January of this year and the present date. Certainly the book does not report any.

Accordingly, since both your company, and the author, clearly knew the statements were false, admitted they had no basis in fact or reality, but decided to publish in order to harm Governor Palin's family, you and Mr. McGinniss have defamed the Palins. This letter shall serve as written notice under

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AS.09.30.070 (b) that a claim may be brought against you, your company and Mr. McGinniss for knowingly publishing false statements.

In the interim, please take note of the following: It is unlawful to delete emails or destroy records upon being notified of the need of business records for litigation purposes. In addition, courts may impose civil sanctions against a defendant that destroys emails and other documentation. Please immediately provide notice to your employees to save and back up all records pertaining to the Palins and the book "The Rogue." Further, as Mr. McGinniss waived the attorney client privilege and disclosed to third parties what "Random House lawyers" told him (he needed sources and the book was not publishable without them), we will also be entitled to review your company's legal correspondence with Mr. McGinniss and his responses thereto.

Please do not hesitate to call if you have any questions or concerns or if you wish to resolve this dispute.

Sincerely yours,



John J. Tiemessen

Direct Dial: [REDACTED]

Email: [REDACTED]

Enclosure: As noted