

July 28, 2012

VIA E-MAIL AND COURIER**Re: Retraction of Statements Relating to Janet Jackson**

Dear Mr. Beckerman:

I represent Janet Jackson. I am writing to advise you that a story regarding my client that recently appeared on TMZ.com is false and defamatory. Specifically, an article published on TMZ.com on July 24, 2012, entitled "Jackson Family Compound Slapping, Punching,"¹ claims that Ms. Jackson, while at her mother's house in Calabasas, California on Monday, July 23, 2012, became involved in an altercation with her niece, Paris Jackson, during which Ms. Jackson purportedly "tried to grab a resistant Paris' cell phone" and "slapped the teenager, screaming, 'You're a spoiled little bitch!'"

These statements are false. Ms. Jackson did not slap Paris, and did not call her a "spoiled little bitch" or a "bitch." Indeed, the same day these defamatory statements appeared on TMZ.com, Paris Jackson denied that Ms. Jackson slapped her.² Randy Jackson, who also was present during the alleged altercation, told ABC's "Good Morning America" that "[t]here was no slapping or calling of names. That never happened."³ In contrast to these eyewitness accounts, the story on TMZ.com cites only unnamed "sources."

TMZ.com's false statements are highly damaging to Ms. Jackson's reputation and have caused her significant harm. For example, the CEO of 5WPR, a public relations firm, told the Huffington Post that "[a]llegations of physical confrontations," such as those made by TMZ.com, "are amazingly damaging for Janet Jackson's career and public persona."⁴ Ms.

¹ See <http://www.t TMZ.com/2012/07/24/pandemonium-at-jackson-family-compound/>.

² See <http://www.madisonline.com/exclusives/2012/07/paris-jackson-debunks-story-janet-slapped-her>.

³ See <http://www.nydailynews.com/entertainment/gossip/katherine-jackson-headed-back-home-family-drama-randy-jackson-insists-hand-michael-children-article-1.1121556>.

⁴ See http://www.huffingtonpost.com/2012/07/27/jackson-family-feud_n_1710754.html.

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Jackson has an international reputation, and TMZ.com's story has damaged that reputation in numerous countries around the world. In addition, TMZ's heinous accusations threaten to damage Ms. Jackson's intellectual property and her relationships with major corporations.

This harm has been exacerbated by the fact that, since TMZ.com's story was originally published, its false and malicious reporting has been picked up by numerous other media outlets around the world, including the Huffington Post,⁵ the U.K.-based Daily Mail Online,⁶ and NDTV.com of India,⁷ among many others. Thus, even people who have never heard of TMZ.com are now aware of this false and defamatory story.

By this letter, I am putting you on notice of the falsity of the statements that TMZ.com has published regarding Ms. Jackson. I demand that TMZ.com retract its statements that Ms. Jackson slapped Paris Jackson and called her a "spoiled little bitch" and that they be removed from all TMZ.com articles or other publications in which they appear. To the extent that TMZ TV has repeated these false statements, I demand that it make an on-air retraction. I also demand that TMZ.com contact all other media outlets that have published TMZ.com's false statements and inform them of its retraction.

This demand is made without prejudice to Ms. Jackson's rights, and she expressly reserves all rights against TMZ.com, any persons or entities associated with TMZ.com, and others.

Sincerely,



Blair G. Brown

cc: Janet Jackson
Harvey Levin (by courier)

⁵ See http://www.huffingtonpost.com/2012/07/25/janet-jackson-slaps-niece_n_1702138.html.

⁶ See <http://www.dailymail.co.uk/showbiz/article-2178262/Janet-Jackson-loses-Extraordinary-moment-singer-slaps-Paris-calls-spoiled-little-b.html>.

⁷ See <http://www.ndtv.com/article/music/janet-jackson-regrets-her-role-in-the-family-drama-over-nj-s-estate-248540>.