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September 7, 2018

VIA FEDEX; FIRST-CLASS MAIL
and EMAIL: anniedelgado2@yahoo.com

Ms. Annie Marie DelGado
5521 Eagle Lake Drive
Palm Beach Gardens, FL 33418

Re: Trump Team 2020 Florida Republican Club

Dear Ms. Delgado:

You have been notified previously that we are litigation counsel to Donald J. Trump for President, Inc. (the "Campaign"). In our letter dated May 7, 2018, we notified you that your activities and representations during fundraising events and in other contexts were likely to give the public the misimpression that you or the Trump Team 2020 Florida Republican Club (the "Club") are affiliated with the Campaign. A courtesy copy of that letter is attached.

It has come to our attention that through your on-going activities, the public is likely to continue to be confused or misled as to the nature of the relationship between you and/or the Club and the Campaign. The Club's use of a disclaimer, stating that it is not affiliated with any candidate, seems to be scattershot at best. The most recent example is the Eventbrite posting for the Club's Lecture and Book Signing event planned for October 15, 2018. Because the posting does not carry any disclaimer clearly stating that the Club is not affiliated with the Campaign, individuals viewing the Eventbrite posting and purchasing tickets to the event may be confused or misled into believing that the event has been authorized by President Trump or the Campaign. Accordingly, the Campaign hereby demands that you immediately add a disclaimer to the Eventbrite posting and all other similar fundraising and marketing materials indicating that the Club and the event is not affiliated with, authorized, endorsed, or sponsored by the Campaign or any of its affiliates.

Moreover, despite our previous cease and desist demand, we have sound reason to believe that you continue to improperly hold yourself out as a member of the Campaign and/or as having the authority to act on its behalf (whether by making affirmative misrepresentations or by knowingly failing to correct the false impression of others by affirmatively stating otherwise). By way of example, we refer you to the “Eye on South Florida” interview published on June 15, 2018 at <https://www.youtube.com/watch?v=Eb3Bctf7hu8>. The interviewer’s misleading statement that you “did deliver Florida in 2016 for the President” combined with your discussion of the “ground games that WE are implementing” for 2020, likely gives the public the overall mistaken impression that you are an authorized agent of the Campaign when you know full well that you are not.

While we respect the rights guaranteed by the First Amendment to discuss political issues and candidates, your knowing and/or reckless perpetuation of the falsehood that you and the Club are affiliated in any way with the Campaign is not that and must stop forthwith.

The Campaign is prepared to pursue its remedies in this matter to the fullest extent under the law. You are urged not to test the Campaign’s resolve in protecting its goodwill and reputation and you are strongly advised to immediately comply with the demands contained in this letter. In the event that you continue your unlawful actions, without further notice the Campaign reserves its right to seek injunctive relief, as well as compensatory and punitive damages against you.

Very truly yours,



Lawrence S. Rosen

Enclosure:

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May 7, 2018

VIA FEDERAL EXPRESS,
FIRST CLASS MAIL and
EMAIL: anniedelgado2@yahoo.com
Ms. Annie Marie DelGado
5521 Eagle Lake Drive
Palm Beach Gardens, FL 33418

Re: Trump Team 2020 Florida Republican Club

Dear Ms. Delgado:

We are litigation counsel to Donald J. Trump for President, Inc. (the "Campaign"). The Campaign is an organization that was formed to elect Donald J. Trump to the office of President of the United States in 2016 and will serve as the campaign organization of President Trump when he seeks re-election in 2020.

It has come to the Campaign's attention that the Trump Team 2020 Florida Republican Club (the "Club") is falsely representing to the public that it is an affiliate and/or authorized agent of the Campaign. Moreover, it appears that you are currently, and have been for some time, holding yourself out as a member of the Campaign and/or as having the authority to act on its behalf during fundraising activities and in other contexts. **Any and all such representations that you or the Club are affiliated in any way with the Campaign are false and must stop immediately.**

Your intentional and unauthorized activities and representations are highly likely to confuse, deceive, and/or mislead the voters, media, and public at large into believing that the Campaign endorses, sponsors, sanctions, or otherwise authorizes your activities, which it does not. The likelihood that the public will be confused by your activities is heightened by (a) the Club's

pronouncement that it is “Officially Sanctioned and Chartered by the Republican Party of Florida;” and (b) the sale of Campaign related products at Club events and on its social media pages.

Given that the Club and you have no role with the Campaign or with any other entity associated with Mr. Trump, we demand that you and the Club immediately and permanently: (a) **cease and desist stating or even suggesting to anyone that the Club is in any way affiliated with the Campaign;** (b) **cease and desist representing yourself as a member of, or having the authority to act on behalf of, the Campaign;** (c) **cleanse all content representing that the Club--or you--has any affiliation with the Campaign from all websites and social media pages that you own, directly or indirectly control, or with which you have any connection;** and (d) **add the disclaimer “Trump Team 2020 Florida Republican Club is not affiliated with, authorized, endorsed, or sponsored by Donald J. Trump for President, Inc. or any of its affiliates,” to all websites and social media pages that the Club owns, or directly or indirectly controls, as well as to all fundraising materials, post cards, flyers, stationery, business cards, and any other form of correspondence (whether in electronic or hard-copy format) used by you and/or the Club.**

If you ignore this letter or fail to provide us with written assurances by May 11, 2018 that you and the Club have complied with our demands set forth herein, the Campaign will proceed with the necessary measures to protect its rights, including, if necessary, securing injunctive relief in court against you, and recovering all appropriate compensatory and punitive damages and costs.

We expect that we will not need to resort to these measures and, instead, can reach a prompt resolution to this matter with you. While our client would prefer to resolve this matter short of litigation, such a resolution depends entirely on your prompt and acceptable response to this letter.

Please note, this letter is not intended to be a complete recitation of all facts and circumstances relevant to this matter, and nothing contained in or omitted from this letter shall constitute a waiver or election of any of our clients’ rights or remedies at law or in equity, all of which are expressly reserved and none of which are hereby being waived intentionally. We reserve our client’s right to annex a copy of this correspondence as an exhibit in any court proceeding initiated by either party.

Very truly yours,



Lawrence S. Rosen