

# SOBEL HAN, LLP

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Please respond to the Englewood Cliffs office.

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March 7, 2014

VIA CERTIFIED & REGULAR MAIL

Gallco Media, LLC  
P.O. Box 67  
Belford, New Jersey 07718  
Attention: Art Gallagher

Re: MoreMonmouthMusings.net – Vin Gopal

Dear Mr. Gallagher:

Please be advised this office represents Vin Gopal and we are writing with respect to a post on the blog site MoreMonmouthMusings.net dated March 3, 2014. The referenced post is captioned "Feds Charge Indian National With Abusive Sexual Contact" and has a picture of Mr. Gopal prominently displayed below the heading. Although the picture of Mr. Gopal contains the description "Monmouth County Democratic Chairman Vin Gopal, not Devender Singh," Mr. Gopal and Mr. Singh are both of Indian descent and a cursory glance by a viewer reading the caption displayed in large, bold letters and my client's picture directly below the caption would lead readers to reasonably conclude without further investigation that my client was charged by federal authorities with abusive sexual contact.

Your attempt to justify the use of Mr. Gopal's picture in the blog is misguided and unjustified. A review of posts concerning my client posted on MoreMonmouthMusings.net establishes a pattern of actual malice, and your improper use of my client's photograph below the caption referencing an Indian national being charged with abusive sexual contact was reckless and without regard of the truth. The disclaimer does not absolve you of liability as the post's caption and context of my client's photograph, who is also of Indian descent, would lead a reasonable person of ordinary intelligence to conclude that my client was the "Indian National" referenced in the title. Your use of my client's picture has damaged his reputation and your conduct is unreasonable from even the minimum standard of investigation and reporting attributed to similar blogs.

Demand is hereby made that the above-referenced post be removed and an apology and retraction that clearly denotes your improper use of my client's picture be posted on your site. In the event you fail to comply with our demand, our client has authorized us to pursue all legal remedies under the law. If we do not hear from you within five (5) business days of receipt of this letter, we will have no choice but to conclude that you have no intention of resolving this matter without the need for litigation.

Please be guided accordingly.

Very truly yours,



D. Sam Han, Esq.

cc: Vin Gopal