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November 23, 2007

Maren Christensen
Executive Vice President and General Counsel
Universal Studios
100 Universal City Plaza
Universal City, CA 91608

Dear Ms Christensen:

I am writing to demand that you retract and correct immediately the false and defamatory statement published as fact to the world at the end of *AMERICAN GANGSTER*, a product of Universal Studios, that Frank Lucas and Richard Roberts' "collaboration led to the convictions of $\frac{3}{4}$ of the New York City's Drug Enforcement Agency". They were responsible for no such thing and in fact no such thing ever occurred. This false statement impugns and damages the reputations of hundreds of honest, decent and courageous agents of the New York City Drug Enforcement

Administration (“DEA”) who risked their lives daily on the streets of New York in this period of time bringing to justice people like Frank Lucas and Nicky Barnes. Further, it was DEA, together with the United States Attorney’s Office for the Southern District of New York (“USAO”), which apprehended, prosecuted and tried Frank Lucas and his suppliers, and not Richard Roberts and some Essex County law enforcement organization, as is alleged in *AMERICAN GANGSTER*. The New Jersey prosecution of Frank Lucas in which Roberts was involved took place over one year after Lucas was prosecuted in the Southern District of New York in September 1975 in which he was sentenced to 40 years’ imprisonment.

It is far more than ironic for *AMERICAN GANGSTER* to deprive New York City’s DEA and the USAO of credit for apprehending and prosecuting Lucas and his gang while at the same time smearing DEA agents with false allegations of corruption: it is actionable, and it is actionable on behalf of a whole class of DEA agents.

I represent Gregory Korniloff, a former New York City DEA Agent. Mr. Korniloff was the case agent for DEA on Lucas’ federal case and personally participated in the search of Lucas’ house conducted in January 1975 pursuant to a valid federal search warrant, and the arrest of Lucas on that same day. During this search \$585,000.00 in currency was seized, which was later physically introduced into evidence during Lucas’ federal criminal trial in the Southern District of New York in September 1975. *AMERICAN GANGSTER* represents this search in the most awful and corrupt manner during which Lucas’ wife was assaulted, his dog shot in a vicious manner and thousands of dollars stolen by corrupt law enforcement officers portraying Mr. Korniloff and his colleagues, including other DEA Agents and officers of the NYPD, who assisted him on that day. It is irrelevant to your liability that you represent the corrupt officers to be associated with New York

City's Special Investigations Unit. This organization was disbanded long before Lucas came on the scene as a major narcotics dealer in New York, and was in no way associated with the investigation of Lucas. The public knows full well that it was Mr. Korniloff and his colleagues who searched Lucas' home and, as a result of false depiction made in *AMERICAN GANGSTER*, now believe it was they who engaged in these egregious acts. *AMERICAN GANGSTER*'S final, gratuitous, maliciously false statement, placed in writing on the screen at the end of the movie for "truthful" emphasis, that Roberts and Lucas' "collaboration led to the convictions of ¾ of New York City's Drug Enforcement Agency", demonstrates that this libel of Mr. Korniloff and his colleagues was exactly what you intended. While you may have the right to dramatize actual events, this right does not extend to destroying the reputations of honest and courageous public servants by deliberately misrepresenting the facts.

Moreover, apart from defamation, *AMERICAN GANGSTER* falsely attributes to Roberts and New Jersey law enforcement authorities admirable acts and conduct that were engaged in not by them, but by DEA agents. As noted, it was not Roberts or his "unit" which arrested Lucas in January 1975; it was DEA. It was not Roberts who first prosecuted Lucas; it was the USAO in the SDNY in September 1975. I have personal knowledge of these facts as I personally led the federal prosecution of Lucas and his 18 co-defendants in September 1975. After his 40-year sentence was imposed it was not Roberts with whom Lucas cooperated. It was with the USAO and DEA. And, most importantly, Lucas' cooperation had nothing to do with incriminating law enforcement officials and certainly not members of the Special Investigations Unit. Lucas' cooperation, which admittedly was substantial, was aimed at other narcotics dealers, not law enforcement officers.

AMERICAN GANGSTER is riddled with false information. Its depiction of heroin being supplied to Lucas from Southeast Asia

by means of the coffins of dead GI's is also false. No such thing happened. If you had labeled your movie as fiction, it would have been one thing. But to claim it is based upon fact, as you do, is quite another. It is certainly no defense for you to assert that Lucas told you these events occurred, which I understand he has been doing of late. For even the most cursory investigation would have established that such a false assertion was made to increase the likelihood that his "story" would be purchased by you. Of course you already know this. The same applies to Lucas' assertion that millions and millions of dollars in currency were stolen from his house during the search. This too was easily proven to be false. When I debriefed Lucas following his decision to cooperate, he told me that he had no idea how much money he had at his house, that it was a week or a weekend's receipts from his narcotics business and that \$585,000 sounded right. This is documented throughout his case for anyone who really wanted to know it.

AMERICAN GANGSTER'S false depiction of actual events and its attribution to others of courageous acts engaged in by DEA agents deprive these individuals of their property rights. You have profited enormously based on these false and defamatory statements at the expense of the individuals who actually were responsible for apprehending Lucas and his gang at great risk to their lives.

Please contact me at your earliest convenience. However, I suggest you immediately cause the false statement at the end of the film to be removed from further distribution.

Sincerely,

Dominic F. Amorosa

cc: Richard Cotton
Executive Vice President and General Counsel
NBC Universal

Jeff Zucker
President and CEO
NBC Universal

The image shows the logo for TMZ, rendered in a large, light gray, sans-serif font. The letters are thick and stylized, with rounded terminals. The 'T' has a wide top bar, the 'M' has a distinctive shape with a dip in the middle, and the 'Z' has a sharp, angled bottom.