



Caplin & Drysdale, Chartered  
One Thomas Circle, NW, Suite 1100  
Washington, DC 20005  
202-862-5000 202-429-3301 Fax  
[www.caplindrysdale.com](http://www.caplindrysdale.com)

202-862-5090 Direct  
[DKG@capdale.com](mailto:DKG@capdale.com)

November 17, 2005

**Via Federal Express, Electronic Mail**

Michelle Malkin  
Creators Syndicate  
5777 W. Century Blvd., Suite 700  
Los Angeles, CA 90045  
Telephone: (310) 337-7003  
Electronic Mail Address: [malkin@comcast.net](mailto:malkin@comcast.net)

Re: Libelous Statements pertaining to the Republican Main Street Partnership

Dear Ms. Malkin,

Caplin & Drysdale represents the Republican Main Street Partnership (“RMSP”). It has recently come to our attention that you have made false statements with respect to funding of RMSP by George Soros. Specifically, on November 10, 2005, you posted on your website at [michellemalkin.com](http://michellemalkin.com),

**Update 1145am EST.** Many of you are asking for the list of the anti-drilling Republicans. The group who succeeded in pressuring the GOP to cave in calls itself the “Republican Main Street Partnership.”...

**1pm EST.** Guess who is funding the “Main Street” moderates? George Soros and friends. (Hat tip: David Martosko)

The statements regarding Mr. Soros funding the RMSP are factually incorrect. RMSP does not, nor ever has, accepted any financial support or assistance from Mr. Soros. Your statements to the contrary are false, misleading to the public, and damaging to RMSP’s reputation.

You provide as the source for your claim that RMSP was the recipient of Mr. Soros’s financial backing a hyperlink for “George Soros and friends” to [www.opensecrets.org](http://www.opensecrets.org), which

provides information about Main Street Individual Fund, a Section 527 organization. That organization, which the IRS website indicates has been renamed Republicans Who Care Individual Fund, is NOT the same as the RMSP, nor is it affiliated with or controlled by RMSP. To state otherwise is false, misleading to the public, and damaging to RMSP's reputation.

Furthermore, the page opened in [www.opensecrets.org](http://www.opensecrets.org) fails to provide a good faith basis to believe that Mr. Soros made any contributions to RMSP. In fact, the webpage you reference does not even mention Mr. Soros. A search of contributions by Mr. Soros on the opensecrets.org website yields the information that Mr. Soros gave \$0 to the Main Street Individual Fund. See <http://www.opensecrets.org/527s/527indivsdetail.asp?ID=11001147458&Cycle=2004>.

The purpose of this letter is to provide you with actual knowledge of the falsity of your statements concerning RMSP. This letter puts you on notice that if you continue making false statements regarding Mr. Soros providing financial support to the RMSP, such statements will constitute libel with actual malice.

In order to prevent further legal action against you, we hereby demand that you (i) immediately cease from further libel against RMSP; and (ii) correct the public record.

Sincerely,



Danielle K. Graham, Esq.

#251919

cc: Mr. Rush Limbaugh  
Facsimile: (212) 445-3963

Pat Toomey  
Club for Growth  
Facsimile: (202) 955-9466

GrasstopsUSA.com  
Facsimile: (888) 239-9306

Sean Hannity  
Fox News Channel  
1211 Avenue of the Americas  
New York, NY 10036