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July 21, 2026

Via Email

Zev Shalev
@NarativTV
subscribe@narativ.org

Amanda Ungaro
@amandaungaro
(Sent via Substack)

Re: Demand to Retract, Apologize, and Compensate for the False, Malicious, and Defamatory Statements about the First Lady of the United States of America

Mr. Shalev and Ms. Ungaro:

This law firm serves as litigation counsel for the First Lady of the United States of America, Melania Trump (hereinafter referred to as “Mrs. Trump”). Please direct all future correspondence relating to this matter to my attention. Pursuant to Florida Statute § 770.01,¹ this correspondence demands that Zev Shalev and Amanda Ungaro (collectively, “Defendants”) immediately retract the false, malicious, and defamatory statements made about Mrs. Trump in the YouTube video titled “SPECIAL REPORT: The First Lady Spy Scandal – Amanda Ungaro LIVE and UNFILTERED with Zev Shalev” (the “Video”).² Failure to comply will leave Mrs. Trump with no choice but to pursue any and all legal rights and remedies available to recover damages for the overwhelming financial and reputational harm that Defendants have caused her to suffer.

A. The false, malicious, and defamatory statements in the Video.

In the Video, Defendants published, with malicious intent, the following false and defamatory statements (“Statements”) about Mrs. Trump:

- “THE FIRST LADY SPY SCANDAL”
- “What is she trying to hide? Why come out with a statement like that without ever needing to? ... It’s really the man that you have in common with her, which is Paolo Zampolli.”

¹ Mrs. Trump does not agree or admit that only Florida law applies to any claims she might have in connection with or arising out of the false, malicious, and defamatory statements identified in this correspondence. In addition, Mrs. Trump does not agree or admit that, by sending this letter to Defendants, she is availing herself of the laws of any state in the United States or otherwise waiving any arguments or defenses relating to whether any courts of those states have personal jurisdiction over her.

² “SPECIAL REPORT: The First Lady Spy Scandal – Amanda Ungaro LIVE and UNFILTERED with Zev Shalev” @NARATIVTV (July 13, 2026) (<https://www.youtube.com/live/9BfNtbPUJZw>).



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- “Melania tried to get [Zampolli] to be an ambassador ... and she went on to insist that he become a special envoy. ... He brought her to the United States, he’s in constant contact with her, she’s rewarded him with this special envoy title.”

These Statements are false, malicious, and defamatory because they wrongly imply that Mrs. Trump is committing myriad wrongful, illegal acts.

Defendants published these Statements with actual malice because they knew that the Statements were false; Defendants exhibited reckless disregard for whether the Statements were true; Defendants failed to conduct any due diligence to determine whether the Statements were true, which they are not; Defendants purposefully avoided learning the facts that would have confirmed that the Statements are false, and Defendants harbor ill will toward, and have a bias against, Mrs. Trump.

Due to their scandalous nature, these false, malicious, and defamatory Statements have been widely disseminated across various media, reaching tens of millions of people worldwide. Consequently, Defendants have caused Mrs. Trump to suffer overwhelming financial and reputational harm.

B. Applicable law.

Under Florida law, words are defamatory when “they tend to subject one to hatred, distrust, ridicule, contempt or disgrace or tend to injure one in one's business or profession.” *Johnston v. Borders*, 36 F.4th 1254, 1275 (11th Cir. 2022) (quoting *Am. Airlines, Inc. v. Geddes*, 960 So. 2d 830, 833 (Fla. 3d DCA 2007) (citation and quotation marks omitted)). Defendants’ false, malicious, and defamatory statements easily meet this standard because they were deliberately calculated attacks, motivated by ill will and malicious intent, and were designed to inflict significant financial and reputational harm upon Mrs. Trump.

Defendants cannot escape liability by disguising their false, malicious, and defamatory statements as an expression of Defendants’ opinion. Florida law makes clear that such a defense will not shield them from liability. *See Dershowitz v. Cable News Network, Inc.*, 541 F. Supp. 3d 1354, 1362 (S.D. Fla. 2021); *see also Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 18-19 (1990) (“Even if the speaker states the facts upon which he bases his opinion, if those facts are either incorrect or incomplete, or if his assessment of them is erroneous, the statement may still imply a false assertion of fact. ***Simply couching such statements in terms of opinion does not dispel these implications.***”) (emphasis added); *see also Eastern Air Lines, Inc. v. Gellert*, 438 So. 2d 923, 927 (Fla. 3d DCA 1983).

Given that Defendants published the above-referenced false, malicious, and defamatory statements with actual malice, Defendants’ exposure includes punitive damages. *See Straw v. Chase Revel, Inc.*, 813 F.2d 356, 362-363 (11th Cir. 1987) (“Thus, the appellant falls within the



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protection afforded by *Gertz*, and Straw must show actual malice to obtain punitive damages. ... Only actual malice will support an award of punitive damages.”).

Therefore, Defendants lack any viable defense against the overwhelming reputational and financial harm they have caused Mrs. Trump.

C. Demand.

The above-referenced false, malicious, and defamatory statements were deliberately published to attack Mrs. Trump deliberately. Defendants’ reckless disregard for the truth in publishing the Video, together with their patent bias against Mrs. Trump, underscores the actual malice behind the decision to publish the Video and other prior false, malicious, and defamatory statements, given their plain falsity. Accordingly, Mrs. Trump hereby demands that Defendants: (1) immediately issue a full and fair retraction of the Video, and any and all other false, malicious, and defamatory statements about Mrs. Trump in as conspicuous a manner as they were originally published; (2) immediately issue an apology for the Video, and any and all other false, malicious, and defamatory statements about Mrs. Trump; and (3) financially compensate Mrs. Trump to resolve any and all claims she has or might have related to the Video, and any and all other false, malicious, and defamatory statements Defendants have published about her.

Moreover, please allow this letter to serve as notice to Defendants, Defendants' affiliated entities, subsidiaries, employees, and any other person acting on behalf of or in concert with Defendants, to preserve any and all evidence related in any way to the Video, and any and all other false, malicious, and defamatory statements about Mrs. Trump. Defendants are hereby directed not to destroy, conceal, or alter any paper or electronic files, physical evidence, and/or other data relating in any way, no matter how remote, to the Video, and any and all other false, malicious, and defamatory statements about Mrs. Trump, and/or the circumstances leading to their dissemination, including, but not limited to: (1) all communications between Defendants and any third party in any way related to Defendants’ wrongful statements in the Video and any and all other false, malicious, and defamatory statements about Mrs. Trump; (2) all sources for the Video and any other false, malicious, and defamatory statements regarding Mrs. Trump; (3) any and all documents and data referring to, reflecting, or relating to communications between Defendants and any such third parties or sources regarding the Video and the false, malicious, and defamatory statements regarding Mrs. Trump; and (4) any and all documents in any way related to the Video and any other false, malicious, and defamatory statements regarding Mrs. Trump. This includes any information alleged to be protected by Florida Statute § 90.5015. *See Monarch Air Group, LLC v. Journalism Dev. Network, Inc.*, 2025 WL 445491, at *1 (S.D. Fla. Feb. 10, 2025) (interpreting Fla. Stat. § 90.5015, overruling the assertion of the journalist privilege, and granting a motion to compel).

I understand that many records and files are maintained electronically. However, this letter specifically requests that all paper and hard-copy originals be preserved in their original format. By the same token, electronic documents and the storage media on which they reside may contain



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relevant, discoverable information beyond that which may be found in printed documents. Therefore, even where a paper copy exists and has been preserved, please preserve and maintain all electronically stored documents in their original native format, including all metadata. This preservation demand specifically encompasses any and all electronic documents, including, but not limited to, word-processed files, emails, spreadsheets, databases, log files, and any other electronically stored or generated documents or files.

If Defendants do not comply with the above by **July 29, 2026, at 5:00 p.m. EST**, Mrs. Trump will be left with no alternative but to enforce her legal and equitable rights, all of which are expressly reserved and are not waived, including by filing legal action for substantial damages. Defendants are on notice.

PLEASE GOVERN YOURSELF ACCORDINGLY.

Very truly yours,

/s/ Alejandro Brito

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