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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DECISION

BURKE RAMSEY, a minor by his next friends and natural parents, JOHN RAMSEY and
PATSY RAMSEY,

CIVIL ACTION

FILE NO. 99-CV-3087

Plaintiff

V.

AMERICAN MEDIA, INC., and
STAR EDITORIAL, INC.,
doing business as STAR,
Defendants.

PLAINTIFF'S RESPONSES TO MANDATORY DISCLOSURES

1.

State precisely the classification of the cause of action being filed, a brief factual outline of the case including plaintiffs contentions as to what defendant did or failed to do, and a succinct statement of the legal issues in the case.

This is an action for libel arising out of the publication by Defendants of libelous headlines, stories and statements in two issues of the supermarket tabloid magazine known as STAR. Plaintiff Burke Ramsey is the 12-year-old brother of JonBenet Ramsey, a 6-year-old child murdered in December of 1996 in Boulder, Colorado. The May 25, 1999 issue of STAR contained a cover story about the JonBenet Ramsey murder investigation headlined, "Ramseys in top secret plea bargain talks as evidence shows ... JONBENET WAS KILLED BY BROTHER BURKE Heartbreaking inside story" and "JONBENET PLEA BARGAIN SHOCKER And the prime suspect is her brother Burke, age 12".

The headlines for the May 25 story and the gist of the May 25 story were false and libelous. The May 25 story also contained false and defamatory statements about Plaintiff Burke Ramsey. The June 1, 1999 issue of STAR also contained a cover story about the murder investigation headlined, "As D.A. closes in ... SAD TWISTED LIFE OF JONBENET'S BROTHER" and "Inside twisted mind of JonBenet's brother". The headlines for the June 1 story and the gist of the

June 1 story were false and libelous. The June 1 story also contained false and defamatory statements about Plaintiff Burke Rarnsey. The libelous headlines, stories and statements published in the May 25, 1999 and June 1, 1999 issues of STAR caused permanent damage to the reputation of Plaintiff Burke Rarnsey in that said headlines, stories and statements falsely conveyed to the public, among other things, that Plaintiff Burke Ramsey killed his sister, JouBenet Rarnsey.

The issues in the case include, but are not limited to, the following: (1) whether the headlines, stories and statements published by Defendants about Plaintiff Burke Ramsey were false; (2) whether the false headlines, stories and statements published by Defendants defamed Plaintiff Burke Ramsey; (3) whether the false and defamatory headlines, stories and statements were negligently published by Defendants; (4) whether the libelous headlines, stories and statements published by Defendants damaged Plaintiff Burke Ramsey's reputation and if so, (5) the extent of such damage and the amount of actual damages to be awarded to Plaintiff Burke Ramsey; (6) whether the conduct of Defendants constituted willful misconduct, malice, fraud, wantonness, oppression, or that entire want of care which would raise the presumption of conscious indifference to consequences; (7) whether the false and defamatory headlines, stories and statements were published with actual malice and if so,

(8) the amount of punitive damages to be awarded to Plaintiff Burke Ramsey to punish and deter Defendants.

2.

Describe in detail all statutes, codes, regulations, legal principles, standards and customs or usages, and illustrative case law which plaintiff contends are applicable to this action.

O.C.G.A. § 51-5-1, Libel defined; publication prerequisite to recovery.

O.C.G.A. § 51-5-3, What constitutes publication of libel.

O.C.G.A. § 51-5-5, Inference of malice; rebuttal thereof, effect of rebuttal

O.C.G.A. § 51-5-11, Admissibility of evidence in libel action concerning correction and retraction; effect thereof on damages.

O.C.G.A. § 51-12-5.1, Punitive damages.

Gertz v. Robert Welch, Inc., 418 U.S. 323, 94 S. Ct. 2997 (1974). Standard of proof for private defamation plaintiff.

Triangle Publications, Inc. v. Chumley, 253 Ga. 179 (1984). Standard of ordinary care applicable to private defamation plaintiff.

Plaintiff Burke Rarnsey reserves the right to supplement or amend this disclosure response.

3.

Provide the name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information. (Attach witness list to Responses to Mandatory Disclosures as Attachment A.)

See Attachment A.

4.

Provide the name of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. For all experts described in F.R.Civ.P. 26(a)(2)(B), provide a separate written report Satisfying the provisions of that rule. (Attach expert witness list and written reports to Responses to Mandatory Disclosures as

- 3 -

Attachment B.)

Plaintiff Burke Ramsey has not made any decision at this time with respect to witnesses expected to be called as expert witnesses at the trial of this case. Plaintiff Burke Ramsey will supplement his response to this disclosure request at such time as decisions of this nature are made in accordance with the requirements of the Federal Rules of Civil Procedure and the rules of this Court regarding such duty of supplementation.

5.

Provide a copy of, or a description by category and location of, all documents, data compilations, and tangible things in your possession, custody, or control that are relevant to disputed facts alleged with particularity in the pleadings. (Attach document list and descriptions to Responses to Mandatory Disclosures as Attachment C.)

See Attachment C.

6.

In the space provided below, provide a computation of any category of damages claimed by you. In addition, include a copy of or describe by category and location of, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is

based, including materials bearing on the nature and extent of injuries suffered, making such documents or evidentiary material available for inspection and copying under F.R.Civ.P. 34. (Attach any copies and descriptions to Responses to Mandatory Disclosures as Attachment D.)

Plaintiff Burke Ramsey seeks to recover actual damages to compensate him for the damage to his reputation proximately caused by the libelous headlines, stories and statements published by Defendants in the May 25, 1999 and June 1, 1999 issues of STAR, The measure

of damages is the enlightened conscience of fair and impartial jurors.

In addition, Plaintiff Burke Rarnsey seeks to recover punitive damages in an amount that an impartial jury decides in its enlightened conscience is sufficient to punish and deter Defendants. O.C.G.A. § 51-12-5. 1.

- 4 -

7.

Attach for inspection and copying as under F.R.Civ.P. 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. (Attach copy of the insurance agreement to Responses to Mandatory Disclosures as Attachment E.)

Not applicable.

8.

Disclose the full name, address, and telephone number of all persons or legal entities who have a subrogation interest in the cause of action set forth in plaintiffs cause of action and state the basis and extent of such interest.

Not applicable.

This 30th day of November, 1999.

WOOD & GRANT

(signed here by: Lynn Wood)

L. Lin Wood

Ga. State Bar No. 774588

Suite 2140

The Equitable Building

100 Peachtree Street, NW

Atlanta, Georgia 30303

404/522-1713 Attorneys for Plaintiff Burke Rarnsey and
His Next Friends and Natural Parents
John Ramsey and Patsy Rarnsey

-5-

ATTACHMENT A

Plaintiff Burke Ramsey

Address: Withheld for privacy reasons
Telephone: Withheld for privacy reasons
Subject: Falsity of headlines, stories and statements; damages

John Ramsey
Address: Withheld for privacy reasons
Telephone: Withheld for privacy reasons
Subject: Falsity of headlines, stories and statements; damages

Patsy Ramsey
Address: Withheld for privacy reasons
Telephone: Withheld for privacy reasons
Subject: Falsity of headlines, stories and statements; damages

Richard Gooding
Address: Unknown
Telephone: Unknown
Subject: The May 25, 1999 and June 1, 1999 issues of STAR and all issues related
thereto and discussed therein

Representatives from the Boulder County District Attorney's Office

Address: Justice Center
1777 Sixth Street
Boulder, CO 80302
Telephone: 303/441-3700
Subject: Falsity of headlines, stories and statements

Representatives from the City of Boulder Police Department
Address; 1805 33rd Street
Boulder, CO 80301
Telephone; 303/441-3700
Subject: Falsity of headlines, stories and statements

Plaintiff Burke Rarnsey reserves the right to supplement or amend this disclosure response.

ATTACHMENT C

The following categories of documents in Plaintiff's possession, custody or control are relevant to disputed facts:

1. The May 25, 1999 issue of STAR.
2. The June 1, 1999 issue of STAR.
3. The June 22, 1999 issue of STAR.

Copies of these documents are located at the law offices of 1. Lin Wood, Wood & Grant, Suite 2140, The Equitable Building, 100 Peachtree Street, Atlanta, Georgia 30303,

Plaintiff Burke Ramsey reserves the right to supplement or amend this disclosure response

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NOV 3 0

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

BURKE RAMSEY, a minor, by his next friends and natural parents, JOHN RAMSEY and
PATSY RAMSEY,

plaintiff,
CIVIL ACTION

V.

FILE NO.

AMERICAN MEDIA, INC., and
STAR EDITORIAL, INC., 99-CV-3087
doing business as STAR,
Defendants.
COMPLAINT FOR LIBEL

COMES NOW Burke Ramsey, a minor, by his next friends and natural parents John

Ramsey and Patsy Rarnsey, and respectfully states his Complaint for Libel against American

Media, Inc. and Star Editorial, Inc., doing business as STAR, as follows:

1.

Plaintiff Burke Ramsey, age twelve (12), is a minor child as defined by O.C.G.A. §

39-1-1.

2.

John Ramsey and Patsy Ramsey are the natural parents of Plaintiff Burke Ramsey and pursuant to O.C.G.A. § 9-11-17(c), bring this action against Defendants on behalf of Plaintiff Burke Ramsey as his next friends.

- 3 -

3.

Plaintiff Burke Ramsey resides in Atlanta, Georgia with his natural parents.

4.

Plaintiff Burke Ramsey is a citizen of the State of Georgia for purposes of diversity jurisdiction under 28 U.S.C. § 1332.

5,

Defendant American Media, Inc. is a corporation organized and existing under the laws of the State of Delaware with its principal place of business being located at 600 East Coast Avenue in Lantana, Florida.

6.

Defendant Star Editorial, Inc. is a corporation organized and existing under the laws of the State of Delaware with its principal place of business being located at 660 White Plains Road in Tarrytown, New York.

7.

Defendant American Media, Inc. is a citizen of the State of Delaware. for purposes of diversity jurisdiction under 28 U.S.C. § 1332.

8.

Defendant Star Editorial, Inc. is a citizen of the State of Delaware for purposes of diversity

jurisdiction under 28U.S.C. § 1332.

9.

Defendant American Media, Inc, will acknowledge service of summons and complaint by and through its attorneys, Squadron, Ellenoff, Plesent & Sheinfeld, LLP, 551 Fifth Avenue, New York, N.Y.

10.

Defendant Star Editorial, Inc. will acknowledge service of summons and complaint by and through its attorneys, Squadron, Ellenoff, Plesent & Sheinfeld, LLP, 551 Fifth Avenue, New York, N.Y.

11,

This Court has original subject matter jurisdiction with respect to this action pursuant to 28 U.S.C. § 1332 as there exists complete diversity of citizenship between Plaintiff and Defendants and the amount in controversy exceeds Seventy Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

12.

Defendant American Media, Inc. is subject to the jurisdiction of this Court pursuant to O.C.G.A. § 9-10-91(3) with proper venue pursuant to 28 U.S.C. § 1391.

13.

Defendant Star Editorial, Mo. is subject to the jurisdiction of this Court pursuant to O.C.G.A. § 9-10-91(3) with proper venue pursuant to 28 U.S.C. § 1391.

14.

Among other corporate activities, Defendant American Media, Inc. and Defendant Star Editorial, Inc. own, operate and publish a weekly supermarket tabloid magazine known as STAR.

15.

Defendant American Media, Inc. and Defendant Star Editorial, Inc, distribute STAR throughout the nation on a regular basis, including regular distribution to subscribers in the State of Georgia and to retail magazine stands in numerous stores located throughout the State of Georgia.

16.

Defendant American Media, Inc. and Defendant Star Editorial, Inc. own, operate and maintain an

Internet worldwide website known as Star Magazine ONLINE and located at [Www.starmagazine.com](http://www.starmagazine.com).

17.

The cover of each issue of STAR is published worldwide by Defendant American Media, Inc. and Defendant Star Editorial, Inc. on the Star Magazine ONLINE website.

18.

The Star Magazine ONLINE website provides visitors to the website with information on how to subscribe to STAR, including the ability to subscribe to STAR online via the Internet.

19.

The Star Magazine ONLINE website provides visitors to the website with information on how to order and obtain back issues of STAR,

20.

Defendant American Media, Inc. and Defendant Star Editorial, Inc. (hereinafter "Defendants") regularly do or solicit business in the State of Georgia, engage in a persistent course of business conduct in the State of Georgia and derive substantial revenue from the distribution and sale of STAR in the State of Georgia.

21.

In May and June of 1999, Richard Gooding was an individual employed by Defendants as a reporter and writer for STAR.

22.

At all times pertinent and relevant to the incidents described in this Complaint, Richard Gooding was acting within the scope of his employment relationship with Defendants.

23.

The acts and omissions of Richard Gooding, as an employee of Defendants, are imputed to Defendants as a matter of law.

24.

On the night of December 25, 1996 or during the early morning hours of December 26, 1996, while Plaintiff Burke Ramsey was sleeping in his family's home in Boulder, Colorado, an unknown assailant brutally murdered his six-year-old sister, JonBenet Rarnsey.

25.

At the time of his sister's murder, Plaintiff Burke Ramsey was nine (9) years old.

26.

Since the date of her death, the murder of JonBenet Ramsey has been the subject of a massive investigation by law enforcement officials in the State of Colorado, including members of the City of Boulder Police Department and the Boulder County District Attorney's Office.

27.

The investigation of the murder of JonBenet Ramsey has included a grand jury investigation in Boulder County, Colorado, commencing in September of 1998 and ending in October of 1999 without criminal charges or indictments being brought against any individual.

28.

Since the date of her death, the murder of JonBenet Ramsey and the investigation into her murder have been the objects of local, national and international print and broadcast media coverage of an unparalleled magnitude.

29.

As of the date of the filing of this Complaint, the murderer of JonBenet Ramsey has not been discovered and no criminal charges have been filed against any individual in connection with her tragic, untimely and brutal death.

- 6 -

30,

Prior to the murder of his sister, and at all times subsequent thereto, Plaintiff Burke Ramsey has been a private citizen and has never attained the status of public figure for purposes of filing and prosecuting a defamation action.

31.

On the cover of the May 25, 1999 issue of STAR, Defendants published a picture of Plaintiff Burke Ramsey and his sister, JonBenet Ramsey, overwritten with the following sensational, banner headline:

WORLD EXCLUSIVE

Rarnseys

in top secret

plea bargain talks
as evidence shows..

JONBENET WAS KILLED BY BROTHER BURKE

Heartbreaking inside story

32.

The May 25, 1999 STAR cover story headline was libelous in falsely accusing Plaintiff Burke Ramsey of killing his sister.

- 7 -

33.

A true and correct copy of the May 25, 1999 cover of STAR is attached hereto as Exhibit "A" and by reference made a part hereof

34.

On pages 4 and 5 of the May 25, 1999 issue of STAR, Defendants published the "heartbreaking inside story" referenced on the cover under the byline of Richard Gooding (hereinafter "the May 25 story").

35.

Richard Gooding wrote the May 25 story in connection with his employment Defendants as a reporter and writer for STAR.

36.

The May 25 story published pictures of Plaintiff Burke Ramsey along with the following sensational banner headline:

JONBENET PLEA BARGAIN SHOCKER
And the prime suspect is her brother Burke, age 12

37.

The May 25 story headline was libelous in falsely accusing Plaintiff Burke Ramsey of being the prime suspect in the murder of his sister.

38.

A true and correct copy of the May 25 story is attached hereto as Exhibit B.) and by reference made a part hereof

- 8 -

39.

The gist of the May 25 story was that plaintiff Burke Ramsey killed his sister, JonBenet Ramsey, and that plea bargain negotiations were taking place in connection with the belief of law enforcement officials that Plaintiff Burke Ramsey killed his sister.

40.

The gist of the May 25 story was false and libelous.

41.

The May 25 story was libelous in its entirety and by virtue of the following false and defamatory statements, among others, published therein: John and Patsy Ramsey are in secret plea-bargain negotiations with authorities in the JonBenet murder case.

But their son - Burke, 12 - is now being looked at as the prime suspect.

STAR has learned that's the real story behind the scenes of the grand jury drama currently being played out in Boulder, Colo. -amid day predictions that one or both parents were about to be indicted.

The shocking suspicions about Burke - age 9 when JonBenet was killed on Christmas night 1996 - have prompted the Boulder district attorney to try to cut a deal with the Ramsey lawyers in hopes of finally putting the nightmarish case to rest.

Legal experts told STAR that even if Burke were guilty, he could not be charged with a crime because of his age.

But the negotiations were said to involve what kind of treatment or counseling the boy might receive and also possible charges against either Patsy or John for helping cover up the crime.

While fan-lily friends insist the two children were the closest of playmates, investigators have long thought Burke had every reason to be resentful of all the attention heaped on this pretty younger sister as she was being groomed by her mother and grandmother to win the Miss America crown that eluded Patsy.

Authorities now believe the "flashpoint" for the Christmas night horror was when 6-year-old

JonBenet wet her bed that night and - as she often did - went down the hall to Burke's room and crawled in the bed with her brother,

They believe that Burke let loose his pent-up rage at his sister that night and lashed out at her physically, say sources.

D.A. Hunter wants to cut a deal, say the sources, in to avoid a long and costly trial,

- 10 -

But he also wants Patsy punished in some way for the role authorities believe she played in faking a ransom note and trying to cover up the murder, And he wants to force some kind of counseling or treatment for Burke.

42

At the top of the cover of the June 1, 1999 issue of STAR, Defendants published following sensational, banner headline:

As D.A.
closes in...
SAD TWISTED LIFE OF
JONBENET'S BROTHER

43.

The June 1, 1999 STAR cover headline was libelous in falsely conveying that the Boulder County District Attorney was "closing in" on Plaintiff Burke Ramsey.

44.

The June 1, 1999 STAR cover headline was libelous in falsely stating that Plaintiff Burke Ramsey had a "sad twisted life".

45.

A true and correct copy of the June 1, 1999 cover of STAR is attached hereto as Exhibit "C" and by reference made a part hereof.

- 11 -

46.

On page 29 of the June 1, 1999 issue of STAR, Defendants published the story referenced on the

cover about Plaintiff Burke Ramsey under the byline of Richard Gooding (hereinafter "the June I story").

47.

Richard Gooding wrote the June 1 story in connection with his employment by Defendants as a reporter and writer for STAR.

48.

The June I story published pictures of Plaintiff Burke Ramsey along with the following sensational, banner headline:

Inside twisted mind of JonBenet's brother

49.

The June I story headline was libelous in falsely accusing Plaintiff Burke Ramsey of having a twisted mind.

50.

A true and correct copy of the June I story is attached hereto as Exhibit "D" and by reference made a part hereof.

51.

The gist of the June 1 story was that Plaintiff Burke Ramsey murdered his sister, JonBenet Ramsey, because he had a twisted mind.

-12-

52.

The gist of the June I story was false and libelous.

53.

The June 1 story was libelous in its entirety and by virtue of the following false and defamatory statements, among others, published therein:

Burke Ramsey led a tormented life - never able to compete with his child beauty queen sister JonBenet, experts say,

Child-care specialists, law-enforcement authorities and family friends have painted a harrowing

picture of the 12-yearold in the wake of STAR's bombshell revelation that he is being looked at as a prime suspect in the murder of JonBenet.

STAR revealed last week that Boulder, Colo. District Attorney Alex Hunter has begun secret plea-bargain negotiations with the Ramseys after narrowing the focus of the investigation to Burke and a cover-up, complete with fake ransom note, which police think was masterminded by mother Patsy.

Experts agree that this could have been a logical scenario for the murder of 6-year-old JonBenet on Christmas Night 1996.

-13-

"And I think when John Ramsey said he wanted mercy for this daughter's killer, he knew what he was saying.

"It could have been an accident.

"They were protecting their last child."

Burke cannot be tried for his sister's murder because he was under 10 years of age at the time of her death.

54.

Plaintiff Burke Ramsey did not murder his sister, JonBenet Ramsey.

55.

Plaintiff Burke Rarnsey did not let loose pent-up rage at his sister on the night ofof death and he did not physically lash out at her.

56.

No plea bargain negotiations took place between officials in the Boulder County District Attorney's office and attorneys for John Ramsey, Patsy Rarnsey or Plaintiff Burke Ramsey based on the belief of law enforcement officials that Plaintiff Burke Ramsey killed his sister.

57.

The Boulder County District Attorney never wanted to force Plaintiff Burke Ramsey to undergo counseling or treatment because he killed his sister but could not be charged with a crime due to his age.

58.

The Boulder County District Attorney was never closing in on Plaintiff Burke Ramsey as the person responsible for the murder of his sister, JonBenet Ramsey.

59.

Plaintiff Burke Ramsey was a happy, normal 9-year-old boy prior to his sister's murder and he did not have a twisted life or a twisted mind.

60.

Prior to the publication of the May 25, 1999 and June 1, 1999 issues of STAR, officials with the City of Boulder Police Department had publicly stated that Plaintiff Burke Ramsey was a witness, not a suspect, in connection with the investigation into the murder of his sister.

Prior to the publication of the May 25, 1999 and June 1, 1999 issues of STAR, Richard Gooding did not attempt to contact the Boulder County District Attorney or officials in his office to seek confirmation as to the truth of the defamatory headlines, stories and statements published about Plaintiff Burke Ramsey.

62.

Prior to the publication of the May 25, 1999 and June 1, 1999 issues of STAR, no employee of STAR attempted to contact the Boulder County District Attorney or officials in his office to seek confirmation as to the truth of the defamatory headlines, story and statements published about Plaintiff Burke Ramsey.

-15

63.

On May 20, 1999, the Boulder County District Attorney issued a public statement that Plaintiff Burke Ramsey was not a suspect in the death of his sister, JonBenet Ramsey, and was not being looked at as a possible suspect.

Defendants negligently published the false and defamatory headlines, stories and statements about Plaintiff Burke Ramsey.

65.

Defendants knowingly published the libelous headlines, stories and statements about Plaintiff Burke Ramsey without any reliable, trustworthy or credible sources for said statements and without corroboration.

66,

Defendants published the false and defamatory headlines, stories and statements about Plaintiff Burke Rarnsey with actual malice in that they published said headlines, stories and statements with actual knowledge of falsity or with a reckless disregard for the truth or falsity of said headlines, stories and statements.

67.

Defendants intentionally published the libelous headlines, stories and statements about Plaintiff Burke Ramsey in an effort to increase sales of STAR and increase corporate profits by falsely sensationalizing STAR's coverage of Plaintiff Burke Ramsey's role in the murder of JonBenet Ramsey and the investigation into the murder.

-16-

68.

By letters dated May 25, 1999 and May 27, 1999, legal counsel for Plaintiff Burke Ramsey demanded that Defendants correct and retract the May 25, 1999 and June 1, 1999 libelous headlines, stories and statements in full and strict compliance with the statutory requirements of O.C.G.A. § 51-5-11.

69.

Defendants received the May 25, 1999 and May 27, 1999 retraction demands on June 2, 1999.

70.

Defendants failed to correct and retract the libelous headlines, stories and statements in their next regular issue of STAR as required by law.

71.

In the bottom right hand corner of the cover of the June 22, 1999 issue of STAR, Defendants published the following inside story headline:

RAMSEYS QUIT HOME ON EVE OF JONBENET VERDICT
PLUS Brother Burke cleared - We were wrong

72.

A true and correct copy of the June 22, 1999 cover of STAR is attached hereto as Exhibit E.) and by reference made a part hereof.

73.

On page 4 of the June 22, 1999 issue of STAR, Defendants published statements admitting that their May 25, 1999 and June 1, 1999 issues falsely stated that Plaintiff Burke Ramsey was a suspect in the murder of JonBenet Rarnsey.

74.

A true and correct copy of the June 22, 1999 story is attached hereto as Exhibit "F" and by reference made a part hereof.

75.

The June 22, 1999 issue and the statements published on page 4 of said issue did not constitute a lawful correction and retraction of the libelous headlines, stories and statements as required by O.C.G.A. § 51-5-11 in that:

(a) the libelous headlines, stories and statements about Plaintiff Burke Rarnsey were published with malice;

B.) Defendants did not attempt to correct and retract all of the libelous headlines, stories and statements published about Plaintiff Burke Ramsey in the May 25, 1999 and June 1, 1999 issues of STAR;

(c) Defendants did not publish any correction or retraction within the time period required by O.C.G.A. § 51-5-11 (b)(1)(B);

- 18 -

(d) Defendants did not correct and retract any of the libelous headlines, stories and statements published about Plaintiff Burke Ramsey in as conspicuous and public a manner as that in which the alleged libelous statements were published as required by O.C.G.A. § 51-5-11 (b)(1)(B); and

E.) Defendants did not specifically repudiate all of the libelous headlines, stories and statements in a timely issue or in an editorial published therein as required by O.C.G.A. § 51-5-11 (b)(1)(C).

76,

The false and defamatory headlines, stories and statements published about Plaintiff Burke Ramsey proximately caused permanent injury to his reputation.

77.

The false and defamatory headlines, stories and statements published about Plaintiff Burke Rarnsey proximately caused held him to be exposed to public hatred, contempt and ridicule.

78.

By virtue of the subject matter of the false and defamatory headlines, stories and statements published about Plaintiff Burke Ramsey, their publication by Defendants constitutes libel per se.

79.

Plaintiff Burke Ramsey is entitled to recover actual damages from Defendants for his injuries.

- 19 -

80.

The conduct of Defendants establishes actual malice and demonstrates willful misconduct and that entire want of care which raises a presumption of conscious indifference to consequences.

81.

Defendants' exploitation of and accusations of murder against a 12-year-old child for profit demand the recovery of significant punitive damages to punish these corporate tabloid publishers and deter them from ever again sensationally publishing for corporate financial gain false headlines, stories or statements accusing children of committing heinous crimes.

82,

Plaintiff Burke Ramsey is entitled to an award of punitive damages from Defendants in order to punish, penalize and deter Defendants from repeating their unlawful conduct.

WHEREFORE Plaintiff Burke Ramsey, by and through his next friends and natural parents, John Rarnsey and Patsy Rarnsey, demands:

(a) That judgment be entered against Defendants, American Media, Inc. and Star Editorial, Inc., jointly and severally, for actual damages in an amount not less than Five Million Dollars
(5,000,000.00)

B.) That judgment be entered against Defendants, American Media, Inc. and Star Editorial, Inc., jointly and severally, for punitive damages in an amount not less than Twenty Million Dollars (\$20,000,000.00) to punish and penalize Defendants and to deter Defendants from repeating their unlawful conduct; and

- 20 -

(c) That all costs of this action be assessed against Defendants.

TRIAL BY JURY DEMANDED.

WOOD & GRANT

{signat
ure of
Lynn
Wood}
L. Lin Wood
Ga. State Bar No. 774588
Suite 2140
The Equitable Building
100 Peachtree Street, NW
Atlanta, Georgia 30303
404/522-1713 Attorneys for Plaintiff Burke Ramsey and
His Next Friends and Natural Parents,
John Ramsey and Patsy Ramsey