

Exhibit 1

REPORT OF EXPERT AND HYBRID WITNESS THOMAS MADDEN

My name is Thomas J. Madden. I am the former Vice President, Assistant to the President of NBC, and then I worked for TV wunderkind Fred Silverman. Before that, I was Director of Public Relations at ABC. A graduate of The Annenberg School of Communications, he started as a reporter for The Philadelphia Inquirer and is the author of "SPIN MAN" and other books and many articles on public relations. I was also the Director of Public Relations at ABC.

I am a graduate of The Annenberg School of Communications, and I started as a reporter for The Philadelphia Inquirer and am the author of "SPIN MAN" and other books and many articles on public relations. I have been employed extensively in the field of publicity, including but not limited to my work at Transmedia Group, a boutique publicity firm that I founded in 1981. TransMedia Group is an award-winning, multi-lingual public relations firm serving clients worldwide with a broad-spectrum of communications services from its headquarters in Boca Raton, Florida.

Based on my expertise in the field of publicity and public relations, I will be providing testimony as both an expert witness and as a lay witness as I was able to witness the effects of the defamatory statements in my home state of Florida, as well as throughout the state and country as I am constantly reviewing publicity for my profession.

I have reviewed the impact the following articles have had on Plaintiff Larry Klayman:

- 1.The February 22, 2013 article entitled "Birther Lawyer Fighting Joe Arpaio Recall Was Found to Have 'Inappropriately Touched' His Kids"
- 2.The June 18, 2013 article entitled "Larry Klayman Under Investigation by Arizona Bar"
- 3.September 28, 2012 article titled: "Bradlee Dean's Attorney, Larry Klayman, Allegedly Sexually Abused His Own Children."

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For my testimony, I will utilize the exhibits that have been provided to the Defendants in connection with the Complaint and any other pleadings filed within this lawsuit as well as any documents that may be uncovered during the course of discovery.

Upon seeing the widespread circulation and republication of these articles, all of which contained defamatory statements, it is my expert opinion that Mr. Klayman has been severely harmed as a result of the publications. Undoubtedly, this amount of negative publicity, especially with the severity of the accusations, has hurt Mr. Klayman's reputation both in a personal and professional capacity. It is also my expert opinion that these false accusations have caused him great financial and economic harm.

I am also a lay witness to the effect that these defamatory articles had on Mr. Klayman's reputation throughout my home state of Florida and throughout the country. I have known Mr. Klayman for many years and I am familiar with him, his reputation, and his law practice. Mr. Klayman is widely known and respected throughout the state of Florida and the country. I saw the effects that these false allegations had to his reputation and I will testify to that effect.

In the past four years I have not appeared as an expert witness in any lawsuits. Further, I am not receiving any compensation for my testimony.

Sincerely,

Dated: July 22, 2014

/s/ Thomas J. Madden

Thomas J. Madden