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May 20, 2021

**BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Mr. Chris Hansen  
321 E 54<sup>th</sup> Street, Apt 3B  
New York, NY 10022

**Re: False Accusations Regarding Peter Nygard**

Dear Mr. Hansen:

We have been retained by Peter Nygard in connection with your publication of various accusations against him. The accusations include those you have made directly through interviews and indirectly through your production of television broadcasts. The accusations, only some of which are described below, constitute defamation and wrongly accuse Mr. Nygard of the most heinous crimes. Despite Mr. Nygard's emphatic denials and the known evidence directly undermining the credibility of some of Mr. Nygard's self-described "victims," you have presented these accusations as fact. We demand that you immediately and permanently cease and desist from communicating false allegations about Mr. Nygard and retract and correct the false, defamatory, and disparaging accusations you have made against Mr. Nygard.

In addition to being an executive producer on the recent Discovery documentary series "Unseamly: The Investigation of Peter Nygard," you have published defamatory statements on your YouTube channel "Have a Seat with Chris Hansen," and in interviews you have given to third parties, such as on the YouTube channel "VladTV," and Saun Attwood's True Crime Channel. Through statements made via these programs, you have participated in an orchestrated plot to knowingly, recklessly and irresponsibly destroy Mr. Nygard's reputation.

For example, you have described Mr. Nygard as a man whose purported sexual misconduct has gone on routinely for decades, and who has engaged in a variety of other crimes, including bribery and acts of violence. In doing so, you have generally ignored and failed to alert your listeners that these are unproven allegations, and have minimized that these accusations began after an investigation by Louis Bacon, Mr. Nygard's neighbor in the Bahamas, who has been engaged in litigation with Mr. Nygard for many years. Specifically, you have minimized and/or failed to report that Mr. Bacon has provided financial assistance to the investigation and, *as reported by the New York Times* but not by you, two of Mr. Nygard's accusers have recanted their stories, and an unknown number of accusers have received payments funded by Mr. Bacon. At the same time that you have minimized or failed to mention facts calling into question the credibility of some of Mr. Nygard's accusers, you have only mentioned occasionally and in passing, if at all, that Mr. Nygard vehemently denies and contests these accusations.

You have also made the shocking allegation that Mr. Nygard deliberately impregnated underage girls and then forced them to have abortions so that he could gather stem cells from his own embryos. This highly inflammatory and defamatory allegation – which is not contained in the court pleadings – is not only completely false, but also incompatible with the easily verifiable facts about the nature of stem cell research. Although Mr. Nygard is a proponent of stem cell research and has, at times, claimed to have grown his “own embryonic cells,” he has done this through the use of somatic-cell nuclear transfer (“SCNT”). Although SCNT, like most stem cell research, is not free from controversy, it is notable for *not requiring* a pregnancy to harvest cells. That is, SCNT uses an *unfertilized* egg. Thus, you have taken Mr. Nygard’s statements regarding stem cell research and therapy and distorted them in a defamatory manner to fit your preconceived narrative of Mr. Nygard as a sexual predator who manipulates and preys on women.

In the course of making these defamatory statements, you have given a platform to Greg Gutzler, one of the attorneys representing Mr. Nygard’s anonymous accusers in both the civil class action and individually brought lawsuits. It is evident that Mr. Gutzler’s participation in media interviews, including with you, is part of his efforts to recruit additional women to join the crusade against Mr. Nygard. Mr. Gutzler’s efforts to recruit additional “Jane Doe” plaintiffs has involved questionable methods as some women have been solicited via both threats and unrealistic promises. For example, based on our investigation, one person received a communication from Mr. Gutzler threatening her with being “implicated along with Nygard” if she did not agree to work with Mr. Gutzler. After making this threat, Mr. Gutzler messaged her repeatedly, in one instance representing that she could be “protected” by working with Mr. Gutzler, implicitly threatening her to gain her cooperation.

Similarly, a person representing herself as an agent of Mr. Gutzler’s and Lisa Haba’s called the former CFO of Nygard International Partnership, telling him that he could be “hurt” with regard to the FBI’s investigation, and suggested that speaking to Mr. Gutzler would alleviate that risk.

In another example, a person who has worked with Mr. Nygard for over ten years has received repeated messages from Mr. Gutzler and Ms. Haba on Facebook, presumably in an attempt to intimidate her. In one of the messages, Mr. Gutzler threatened this person with the prospect of criminal prosecution if she did not join his crusade, suggesting that she could be “holding the bag like Ghislaine Maxwell” if she did not cooperate and then following up with another Facebook message that the “minimum sentence will be 15 years for you. Hope it has been worth it.”

There are yet more examples. Mr. Gutzler sent multiple texts to another person named Ana Garcea. The facts known to us about those texts are as follows.

1. On a date no later than August 2020, an individual using telephone number +1 (314) 541-2529 communicated with ANA GARCEA via text message, trying to convince her to work against Nygard. During the communications, the sender of the text messages made comments to ANA GARCEA about “poisoning water”, “putting lotion on Nygard’s knees” and intimating that she should work with him against Nygard. Upon information and belief, this telephone number belongs to GREG GUTZLER.

2. On another date, ANA GARCEA received a text message from this same telephone number +1 (314) 541-2529. The text message indicated that the sender represented over 70 women who “were r . . . d” by Peter Nygard.” The sender further informed ANA GARCEA that “As you may know, dozens of Nygard insiders are coming forward to tell their truth so they don’t get implicated along with Nygard.” This text message was designed to threaten, harass and influence ANA GARCEA.
3. The sender of the text further indicated to ANA GARCEA that he could “explain how [she] could be protected in the process”, demonstrating that he was trying to influence her.
4. On another date, ANA GARCEA received another text message from this sender with a link to a CBC article.
5. On or about November 11, 2020, ANA GARCEA received another text message from this sender, with a link to a DiCello Levitt article, with an accompanying text “Stay tuned. More are coming”.
6. On another date, ANA GARCEA received another text message from this sender with a link to an additional DiCello Levitt article.

Finally, in August 2020, KEN GRONDIN, the former CFO of Nygard International Partnership, was called by an agent for GUTZLER and HABA claiming that MR. GRONDIN should speak with GUTZLER and HABA about Nygard. The agent claimed that lots of former associates were coming forward including ANGELA DYBORN, who were going to testify against him and that they could “hurt him” and that he should immediately speak to the FBI and/or GREG GUTZLER providing the phone number, (314) 541-2529.

Now that you are aware of Mr. Gutzler’s questionable and unprofessional tactics used to recruit “victims” to join the lawsuit against Mr. Nygard, providing any further platform to him without also informing viewers of these tactics would be irresponsible and reckless.

Not content to limit your slander of Mr. Nygard to accusations of rape, sex trafficking, and intimidation, you published on your YouTube channel statements linking Mr. Nygard to Hitler by including allegations that he was obsessed with Hitler and employed “dark psychology” to manipulate others. These baseless statements link Mr. Nygard with one of history’s most infamous and reviled figures and convey to the viewer that, not only is Mr. Nygard an accused rapist, but falsely imply he studies and models himself after Hitler.

In sum, the allegations you have made about Mr. Nygard are *utterly false*. These allegations are very serious and have severely harmed Mr. Nygard. Despite Mr. Nygard’s denials, and the presumption of innocence that is a cornerstone of American society, you have presented the unproven allegations against Mr. Nygard as fact. Moreover, you have made several unsupported and highly inflammatory allegations that are not made against Mr. Nygard in any court proceedings, such as the heinous allegation that he deliberately impregnated women to harvest their embryos and the reprehensible comparison to Hitler.

On behalf of Mr. Nygard, we demand that you immediately cease such conduct, and retract and correct your previous statements by prominently posting corrections to the videos you have posted online. Mr. Nygard is prepared to pursue all remedies in law and equity.

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Sincerely,



Alan S. Lewis

ASL:bp