

# **EXHIBIT “10”**



maliciously and/or willfully published and furthered the publication of a false statement that Plaintiff Klayman had been 'convicted' of a crime for not paying a large amount of child support with regard to his children, on the internet and elsewhere within this judicial district, Florida, and elsewhere throughout the United States and the world."

6. I deny Klayman's claims and I deny that I am liable on Klayman's claims for defamation, defamation by implication, tortious interference with a contract, and intentional infliction of emotional distress.

7. I have never published, stated or implied that Larry Klayman had been convicted of a crime of not paying a large amount of child support, and I never directed, instructed, encouraged, or authorized any person to publish, state or imply that Larry Klayman had been convicted of a crime of not paying a large amount of child support. If such a statement was made, it was made without my knowledge, and therefore, I did not intend, and could not have intended, to cause any harm to Larry Klayman through such a statement.

8. I do not: (1) own or lease any real property in Florida; (2) have a telephone listing or mailing address in Florida; (3) have any Florida bank accounts; (4) have any Florida property tax liability; (5) have any Florida registered vehicles or a Florida driver's license; (6) hold any Florida professional licenses; (7) vote in Florida; (8) operate, conduct, engage in, or carry on any personal business in Florida; (9) travel to Florida except occasionally to conduct business on behalf of Judicial Watch, Inc.; (10) contract to insure any person or thing in Florida; (11) commit tortious acts in Florida; (12) cause injury to people or property in Florida; or (13) enter into or breach contracts that are to be performed in Florida.

9. Judicial Watch, Inc. has two employees and a small office in the State of Florida. I supervise these employees in my capacity as President of Judicial Watch, Inc.

10. In the past twenty (20) years I recall making only one trip to Florida for a personal vacation.

FURTHER DECLARANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 2013 in Washington, D.C.

  
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THOMAS J. FITTON