

and TrineDay in disseminating his work in the State of South Carolina.

18. Defendants have promoted and put forth what has been described by the Defendants as a "the true story of a Special Forces officer in Viet Nam" which contains numerous false and libelous accounts of the honorable, and commendable accomplishments of A-424 and the individual Plaintiffs during their tours of duty with Marvin.

19. "Expendable Elite" is being, and has been widely distributed in the United States, including the State of South Carolina through public sales. Further, Marvin has a web site to which the public is invited to view the same allegations as in the book, as well as other more egregious allegations attendant to his original publication.

20. Defendants Trine Day, LLC and Chicago Review Press, Incorporated, systematically and continuously do business in South Carolina by publishing books sold in the State as well as nationwide.

21. The allegations made by the Defendant Marvin and disseminated by the Defendants Trine Day and Chicago Review Press are false.

22. Defendants wrote and published the said book respectively for the purpose of generating revenue.

23. Publication of this book was distributed to thousands of people nationwide, who have read the same.

24. Upon information and belief, the Defendants, their agents, employees, management, investigators, and editors failed to exercise the required duty to vet or confirm the veracity of statements made about the Plaintiffs. They further failed, among other things, to attempt to contact or to contact the Plaintiffs or others to make an inquiry as to whether the Plaintiffs believed Marvin's assertions to be true. Had Defendants done any of the foregoing prior to the publication, the Defendants would have ascertained that there was no merit whatsoever to the assertions made in the book concerning Plaintiffs and that substantial portions of the book were nothing other than fantasies of Marvin.