

25. All Plaintiffs are "private citizens" as that terms defined by Times v Sullivan, (citation).

IV. FIRST CLAIM FOR RELIEF

(Libel and Slander)

26. Paragraphs 1 through 25 above are repeated as if restated herein verbatim.

27. Plaintiffs were libeled and slandered nationwide by the Defendants, injuring the Plaintiffs' reputations as a result of the publication of said book. Plaintiffs also continue to be slandered by Defendants in national events promoting this work. The said falsities in the book "Expendable Elite" are defamatory as it has subjected the Plaintiffs to hatred, ridicule, and contempt, by including but not limited to, readers of the book nationwide and their friends, family members, and fellow and veteran members of the United States Army. The defamatory statements seriously impute criminal conduct by Plaintiffs, and portray Plaintiffs as "loose cannons" in the eyes of the Plaintiffs' fellow United States citizens, including those in the State of South Carolina.

28. The statements made by the Defendants were libelous and slanderous per se, constituting a false imputation of felonious criminal conduct, giving rise to a general presumption of damages by law not required to be proved by evidence.

29. Defendants were negligent, grossly negligent, willful and wanton in making the libelous and slanderous statements referenced herein.

30. Defendants, their agents, employees, management, investigators, and editors published these libelous statements with knowledge of their falsity or in reckless disregard of the truth.

31. Plaintiffs are entitled to general damages, special damages, and punitive damages as may be awarded by the jury.

V. SECOND CLAIM FOR RELIEF

(False Light Privacy)