



February 27, 2026

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VIA E-MAIL AND U.S. MAIL

John C. Goede, Chief Counsel
Goede, DeBoest & Cross, PLLC
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Email: [REDACTED]@gadclaw.com

Re: **Demand for Retraction; Correction; and Cease and Desist**

Mr. Goede:

This firm represents Lifetouch. This letter is made with reference to the article authored by Dean Miller and published by Lead Stories on February 18, 2026 titled *Fact Check: There's NO Proof Lifetouch School Photos Put "You And Every Other American Kid . . . In the Epstein Files" – Mathematically Impossible, Since Lifetouch Only Accounts for 25% of School Photos* (the "Article").¹ For 90 years, Lifetouch has operated in local communities and been the professional photography company of choice for schools and families. During this time, and through its commitments to safety and privacy, Lifetouch has built trusted and respected relationships with its business and school partners, families, and photographers.

While purporting to "fact check" the outrageous and outlandish claim that Lifetouch furnished photos of all American schoolchildren to convicted sex trafficker, Jeffrey Epstein ("Epstein"), the Article compounds confusion. It implies that the claim is false **merely because** Lifetouch "only accounts for a quarter of the contracts awarded to school picture companies so it doesn't even have all those pictures" and that it is mathematically impossible for Lifetouch to have access to all the photos of all schoolchildren in America, implying by corollary Lifetouch gave Epstein the photos it does have. As you know, there is **absolutely no evidence** to support the assertion that Lifetouch shared even a single photo with Epstein, as well as clear and irrefutable evidence that Lifetouch was not acquired by Apollo until after Epstein's death —your implication to the contrary is categorically false, malicious, defamatory, and highly damaging to Lifetouch's reputation and business. The Article points to two "mentions" of Lifetouch on a debit card statement in the Epstein files without providing any necessary context to readers that such "mention" does not mean or imply that Lifetouch furnished photos to Epstein, and likely just reflects a payment for Lifetouch's services.

¹ Available at: https://leadstories.com/hoax-alert/2026/02/fact-check-no-proof-every-american-kid-in-epstein-files-through-lifetouch-school-photos.html#google_vignette (last accessed Feb. 19, 2026)

Furthermore, without any evidentiary support, the Article also falsely implies that Lifetouch may have “violated federal educational privacy laws.” Such statement has no basis in fact or law, is indefensible, and underscores the Article’s malicious intent. Finally, the Article republishes a statement by a TikTok user stating that Lifetouch “never delete[s] your pictures” and “keeps them with your name age and info.” Republishing this false, baseless statement without verifying its accuracy, especially where, as is the case here, the statement overlaid with further false statements is defamatory and actionable.

Lifetouch communicated these concerns to the Article’s author, Dean Miller, to no avail. This correspondence represents Lifetouch’s second and final attempt at resolving these issues without the necessity of Court intervention.

Accordingly, Lifetouch hereby demands the following:

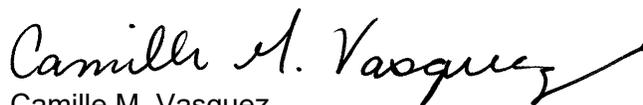
1. Immediate removal of the false and misleading content from Lead Stories, and clarification within the article that:
 - there is absolutely no evidence to support the assertion that Lifetouch shared even a single photo with Epstein;
 - the “mentions” of Lifetouch on a debit card statement in the Epstein files does not mean or imply that Lifetouch furnished photos to Epstein, and likely just reflects a payment for Lifetouch’s services;
 - Lifetouch has not violated federal educational privacy laws; and
 - The statement republished in the Article by a TikTok user stating that Lifetouch “never delete[s] your pictures” and “keeps them with your name age and info” is categorically false.

OR

2. Immediate removal of the false and misleading article entirely from Lead Stories.

Written confirmation within five (5) business days that these actions have been taken must be provided. Otherwise, Lifetouch will pursue all available legal remedies. I am available, should you wish to discuss any of the foregoing. All rights are expressly reserved.

Sincerely,



Camille M. Vasquez
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: Jennifer S. Wilson