

The Editor
The Daily Telegraph

Our Ref: PTB\LCL\0\4220554

The Editor
The Sunday Telegraph

7 March 2011

NOT FOR PUBLICATION

Dear Sir

Ghislaine Maxwell

We represent Ghislaine Maxwell.

In reporting a story relating to Prince Andrew on 6 March 2011 in the Sunday Telegraph you reported that our client is accused "in court papers of introducing young women to Epstein at his Florida mansion". You qualified that by saying "although she has never been arrested nor charged with any offence".

In fact, it goes far wider than that. Our client has not been the subject of any claim and the only claim she was aware of was a claim made by [REDACTED].

You refer to allegations that have been promoted by [REDACTED] and her attorney who we believe is Brad Edwards. Mr Edwards is the former business partner of Scot Rothstein who is currently serving 50 years having created false claims and cases against Jeffery Epstein.

You have further reported the allegations against our client on the Daily Telegraph on Saturday 5th and Monday 7th March. Within those reports are various untrue and defamatory statements.

We demand that you cease publishing such untrue material about our client and ask you to note the following :-

1. Our client was not aware of any improper or unlawful conduct by Jeffery Epstein.
2. Our client has not been named as a party in any proceedings relating to Jeffrey Epstein's unlawful conduct or any other similar conduct by anyone else.
3. Further, no one has at any time even written to our client making any claims against her. If what is being alleged are the genuinely-held beliefs of third parties, the fact that these have never even been put to our client is extraordinary and should have indicated to you that they were likely to be untrue.
4. Furthermore, our client has never even been put on notice of any such claim

5. Our client has never been contacted by any police force or other law enforcement agency in connection with any allegations made against Jeffrey Epstein. She has absolutely no connection to the criminal prosecution of Jeffrey Epstein and neither was she approached by the defence or the prosecution in that matter.
6. The only legal process that our client has ever received is a subpoena for a deposition in civil proceedings brought by [REDACTED] against Jeffrey Epstein and not our client. Our client was not required to answer the deposition as she was instructed Mr Epstein had settled the case. Our client was merely one of many people who were issued with subpoena's in that matter.
7. One of the lawyers primarily responsible for promoting allegations against Jeffrey Epstein was Scott Rothstein. In June 2010, Mr Rothstein was sentenced to 50 years imprisonment for his involvement in what is reported to have been the largest ever fraud in Florida, a US\$1.2 billion ponzi scheme. He is also the primary defendant in a civil law suit based on his fraud in which the claim is US\$100 billion. He is a man without any shred of credibility. He is a proven liar and someone who has sought to manipulate the law to his own advantage. It is recorded in Court papers that Mr Rothstein made and pursued false claims against Jeffrey Epstein which included promoting allegations of improper conduct of the type you describe.
8. Mr Rothstein directly created false cases against Mr Epstein which he then sold to investors. Further he encouraged false complaints to be made. We understand that [REDACTED] attorney Brad Edwards was formerly Mr Rothstein's business partner. It was at the time that these false claims were being created and promoted [REDACTED] came forward.
9. [REDACTED] was summonsed to court for Theft in 2002. We do not know if that is related to her leaving the United States.
10. [REDACTED] has previously made unsubstantiated allegations for sexual misconduct. On at least one other occasion, she claimed to have been sexually assaulted and the US Government declined to prosecute the case "due to the victim's lack of credibility".

Accordingly we demand an apology, retraction and agreement to pay damages by 4pm this Wednesday 9th March.

Absent which our client will take action to clear her name.

Yours faithfully

Devonshires

[REDACTED]