

The Editor
The Sun

Our Ref: PTB\LCL\0\4220542

7 March 2011

NOT FOR PUBLICATION

Dear Sir

Ghislaine Maxwell

We represent Ghislaine Maxwell and are writing to you regarding the highly defamatory allegations published by you on 7 March 2011 in the Trevor Kavanagh.

In this article, Trevor Kavanagh seeks to attack the UK libel laws by implying that newspapers have to say there is not a shred of evidence against either Prince Andrew or our client, Ghislaine Maxwell when by implication there clearly is.

Mr Kavanagh says that our client "allegedly helped supply ex-boyfriend Epstein with underage "sex slaves"

Mr Kavanagh then says, "there is no suggestion that Ghislaine is a disgusting procuress".

These are highly defamatory comments.

Mr Kavanagh may care to reflect upon the fact that the libel laws exist to protect people from having untrue and defamatory allegations made against them in the media. Responsible journalism involves the proper investigation of claims that are then put to individuals who have an opportunity to at least respond before there is publication. None of that has happened in relation to this story.

We would 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".

Would you please note that absent a full apology, retraction and an agreement to pay damages, proceedings will be issued against the Daily Mail, Mail on Sunday and the News of the World.

We are considering with Counsel whether or not to include your paper in any proceedings. In the circumstances, we trust that you will not repeat these allegations as any repetition stands to cause our client considerable loss and damage.

Yours faithfully

Devonshires

[REDACTED]