

The Editor
The News of the World

Our Ref: PTB\LCL\0\4219254

7 March 2011

NOT FOR PUBLICATION

Dear Sir

Ghislaine Maxwell

We represent Ghislaine Maxwell.

Our client is appalled and outraged AND SHOCKED by the highly defamatory allegations published by you on Sunday 6 March 2011.

Our client received no advance notification that you intended to publish and so had no opportunity to defend herself OR TO BE ABLE TO TELL YOU THAT THE ALEGATIONS WERE WITHOUT ANY MERIT, BASLEESS AND WRONG. The articles contain numerous untrue and defamatory statements. It would seem that in the feeding frenzy to attack Prince Andrew our clients rights were totally disregarded.

You have stated that our client has engaged in procuring underage girls to have sex with Jeffrey Epstein. For the avoidance of doubt that is accusing our client of having engaged in very serious criminal misconduct. You have labelled our client as a child abuser. These are extremely serious AND DAMAGING allegations for you to have published and it is extraordinary that you have done so without any advance notice to our client.

You say in your article that:

"Legal paperwork, held by lawyers in West Palm Beach acting for some of the 14 girls who have lodged suits against 58 year old Epstein, also names Prince Andrew's close friend, Ghislaine Maxwell, daughter of disgraced publishing tycoon Robert Maxwell as well as Epstein's social fixer, as a child abuser."

Our client has absolutely no knowledge whatsoever of these papers or the allegations to which you refer.

Accordingly and so our client may defend herself and in accordance with the overriding objective of the Civil Procedure Rules, we require you to immediately provide us with copies of all the documents on which you rely in support of the allegations you have made. In particular "the legal paperwork" to which you refer. We demand this by way of advance disclosure. **Please provide this by 4pm today** given the gravity of the allegations you have published and the lack of notice.

We note from a Google search that Spencer Kuvin says on his website that he acted for victims of Jeffrey Epstein in 2008. Bearing in mind that it is now 2011, it is extraordinary that our client has never received any notice of these proceedings or of the allegations and it is unacceptable that against that background you have published such untrue statements.

Can you please confirm whether or not you were aware of the fact that any such allegations have never been put to our client. If you were not aware, then we would ask you to disclose exactly what investigations you undertook in relation to this matter before you chose to publish. If you were aware of this important fact it will add to the damages that you chose to publish without putting this matter to our client.

You will, of course, appreciate that the allegations you have published are the most serious allegations you could make against someone and it is inevitable that our client will suffer severe damage to her reputation and financial loss, as a consequence of the publication. We demand that you do not repeat the allegations and cause further damage.

We would ask that you carefully note the following:

1. Our client was not aware of any improper or unlawful conduct by Jeffrey Epstein.
2. You refer to Spencer Kuvin acting for 14 girls in proceedings against Jeffrey Epstein and having named our client "as a child abuser". No such allegations have ever been put in any form to our client. The first our client knew of this was on reading your article.
3. Our client has had not NO communications from Spencer Kuvin OR ANYONE IN HIS OFFICE AT ANY TIME.
4. 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.
5. 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.
6. Furthermore, our client has never even been put on notice of any such claim
7. 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.
8. The only legal process that our client has ever received is a subpoena for a deposition in civil proceedings brought by ██████████ 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.
9. 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.

10. 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) EDWARDS WAS A LAW partner. It was at the time that these false claims were being created and promoted [REDACTED] came forward.
11. [REDACTED] was summonsed to court for GRAND Theft in 2002. SHE ABRUTPLEY FLED THE COUNTRY SO AS NOT TO FACE TRIAL
12. [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 that you issue a full apology, a retraction and your agreement to pay damages to be assessed by 4pm this Wednesday. Failing which our will commence proceedings to clear her name of these outrageous allegations and a pre-action protocol letter will be sent later this week

If it is necessary to issue process then we shall seek aggravated damages. If you publish further we shall ask the court to take that into account in assessing the quantum of damages as any such conduct will only serve to increase the loss and damage our client suffers.

Yours faithfully

Devonshires

[REDACTED]