

Daniel Foggo
The Sunday Times

Our Ref: PTB\LCL\0\4218704

5 March 2011

Dear Daniel

Ghislaine Maxwell

I have received an email from you to Brett Jaffe.

I represent Ghislaine Maxwell.

The allegations to which you refer are all entirely untrue and without any factual basis.

Ghislaine Maxwell was not required to answer the subpoena served upon her and has not failed to give a deposition.

I have seen the article in today's Daily Mail and I would wish you to know that Ms Maxwell will be issuing proceedings against the Daily Mail absent receipt of a full retraction and apology on suitable terms.

The allegations made by [REDACTED] [REDACTED] against Ghislaine Maxwell (as at points 1 – 14 of your email) are all entirely baseless, utterly false and without merit.

Ghislaine Maxwell 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 was neither approached by the defence or prosecution in that matter.

Ghislaine Maxwell has not been named as a party in any proceedings relating to Jeffrey Epstein. Further, no one has at any time even written to Ghislaine Maxwell making any claims against her. It is quite extraordinary that if what [REDACTED] [REDACTED] is saying is her genuine held belief, that she did not add Ghislaine Maxwell as a party to any claim or even write to Ghislaine Maxwell putting her on notice of any such claim.

The only legal process that Ghislaine Maxwell has ever received is a subpoena which was served on her and which she was not required to answer.

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

