

PT/BC/

13 March 2011

Telegraph Media Group Ltd.,  
111 Buckingham Palace Road,  
**London SW1W 0DT.**

**FAO: The Editor, *The Daily Telegraph***  
**cc Arthur Wynn Davies, Legal Manager –**  
**Arthur.wynn-davies@telegraph.co.uk**

Dear Sirs,

We have been consulted by Jeffrey Epstein in relation to your grossly inaccurate and persistent references to him being a “paedophile”, in particular in your editions of 7<sup>th</sup> and 10<sup>th</sup> March under the headlines **“Duchess of York admits Duke arranged for convicted paedophile Jeffrey Epstein to pay off her debts”** and **“The Duke, his paedophile guest, and the most unusual use of an RAF base”** respectively, and on your website.

Our client is not, as your headline article alleges, a convicted paedophile. Although he has been convicted of soliciting prostitutes, and procuring a person under 18 for prostitution, he has served his time for that offence ...

Furthermore, the false and distorted terminology used by you to describe our client in your vitriolic attack on his character is in stark contrast to your coverage of the recent scandal involving Italian Prime Minister Silvio Berlusconi, where we can find no reference in your reports to him being described as a paedophile in the face of similar charges.

We cite this example not by way of condoning either our client’s nor PM Berlusconi’s PAST actions (the allegations against Mr. Epstein all antedated the fall of 2005) but to highlight the outrageous and totally unjustified description of our client as a “paedophile” which simply is not true on any interpretation of the word. He has not been convicted nor been accused of being a “paedophile”, a pejorative that has a very specific medical definition, apart from by certain elements of the tabloid press in their recent reports on his friendship with Prince Andrew. Our client however should be entitled to expect more accurate and credible reporting from a respected broadsheet such as the *Daily Telegraph*, which is supposed to have significantly higher standards of reporting than the tabloids known for their sensationalised and exaggerated reporting.

Our client is entitled, at the very least, to the publication of an express clarification and apology, in terms to be first agreed with us, as a matter of some urgency. We would therefore be grateful to receive your proposals in this regard, while our client continues to reserve all his rights in relation to, in particular, what would be a totally justified Complaint to the PCC, together with a claim for defamation and malicious falsehood.

We look forward to hearing from you by return.

Yours faithfully,

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JOHNSONS