

PT/DW/ME000100

5th May 2011

Tatler Publishing Company Ltd
Vogue House
1-2 Hanover Square
London
W1S 1JU

FAO: The Editor, TATLER

BY FAX & POST

Dear Sirs,

We have been consulted by Jeffrey Epstein in relation to your grossly inaccurate and defamatory references to him being a "paedophile", in the June 2011 edition of *TATLER* (Vol. 306 No. 6) under the headline "**GHISLAINE'S WORLD, A life on the front page**".

Our client is not, as your 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. As a matter of record, but without seeking to justify the offence, the girls in question were not pre-pubescent.

Furthermore, the false and distorted terminology used by you to describe our client in your vitriolic attack on his character is simply not true on any interpretation of the word "paedophile". 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 publication such as the *TATLER*, which is supposed to have significantly higher standards than the sensationalised and exaggerated reporting of the tabloids.

Our client is also gravely concerned at your attempts to distort and undermine the basis of his financial standing.

Our client is entitled, at the very least, to the publication of a categorical 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

Johnsons Law Firm

London Office:
21 Arlington Street
London
SW1A 1RN

T +44 [REDACTED]
F +44 [REDACTED]

Belfast Office :
Johnson House
50/56 Wellington Place
Belfast BT1 6GF
DX 405 Belfast 1

T +44 [REDACTED]
F +44 [REDACTED]

Dublin Office :
4 Harbourmaster Place
IFSC
Dublin 1
Ireland
DX 112018 Talbot Street, Dublin

T +353 [REDACTED]
F +353 [REDACTED]

Partners

Paul Tweed LLP *
Michael McKee
Ken Chambers
David Craig
David Holley
Selena Kerins
John McMahan

Consultants

John Marshall
David Rogers

Solicitors

George Strahan
Sarah Loughran
Alison McClung
Carl Rooney
Gareth Liddy
Jennifer Greenfield
James Ead
John Kerr
Kathy Mathews
Brian Connolly
Alex Trimble
Rhys Jones
Deaglan Lundy
Mark Kernaghan
Laura Cunningham

* Paul Tweed, a member of Paul Tweed LLP is also registered as a Foreign Legal Consultant by the State Bar of California

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Paul Tweed LLP SRA ID: 544975

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regard, while our client continues to reserve all his rights including appropriate redress in relation to your defamatory allegations and malicious falsehoods.

We look forward to hearing from you by return.

Yours faithfully,

JOHNSONS