

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 –**  


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 procuring a person under 18 for prostitution, he has served his time for that offence which, as a matter of record, involved a girl just a few months short of her 18<sup>th</sup> birthday. In the UK, of course, this young woman would have been of age. Without seeking to justify our client’s conduct, we would point out that our client had acted in the belief that the girl involved was in fact over 18 years of age, having been informed that this was the case in the above matter, and also by a number of other females who have since brought civil claims against him, [none of which were proven in court or otherwise.] Further, according to Wikipedia, pedophilia is defined “As a medical diagnosis, **pedophilia** (or **paedophilia**) is typically defined as a psychiatric disorder in adults or late adolescents (persons age 16 and older) characterized by a primary or exclusive sexual interest in prepubescent children (generally age 13 years or younger, though onset of puberty may vary).”

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. There is one striking difference: Mr. Epstein never had sex nor was accused of having sex with this young woman.

We cite this example not by way of condoning either our client’s nor PM Berlusconi’s actions, 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”, 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