

The Editor
The Daily Telegraph

Our Ref: PTB\LCL\0\4220554

The Editor
The Sunday Telegraph

7 March 2011

NOT FOR PUBLICATION

Dear Sir

Ghislaine Maxwell

We represent Ghislaine Maxwell.

In reporting a story relating to Prince Andrew on 6 March 2011 in the Sunday Telegraph you reported that our client is accused "in court papers of introducing young women to Epstein at his Florida mansion". You qualified that by saying "although she has never been arrested nor charged with any offence".

In fact, it goes far wider than that. Our client has not been the subject of any claim and the only claim she was aware of was a claim made by [REDACTED] [REDACTED].

You refer to allegations that have been promoted by [REDACTED] [REDACTED] and her attorney who we believe is [REDACTED] [REDACTED]. Mr [REDACTED] is the former business partner of Scot [REDACTED] who is currently serving 50 years having created false claims and cases against Jeffery Epstein.

You have further reported the allegations against our client on the Daily Telegraph on Saturday 5th and Monday 7th March. Within those reports are various untrue and defamatory statements.

We demand that you cease publishing such untrue material about our client and ask you to note the following :-

1. Our client was not aware of any improper or unlawful conduct by Jeffery Epstein.
2. 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.
3. 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.

