

From: "Mike Sitrick" <[REDACTED]>

To: "Jeffrey Epstein" <jeevacation@gmail.com>

Cc: "Tony Knight" <[REDACTED]>

Subject: for discussion on call

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Jeffrey

In addition to the video concept and script I sent, I thought it would be worth discussing my conversation this morning with Paul Tweed of the Johnsons law firm of London. (He is the defamation lawyer I have used in the UK.) He believes we should start with a letter to the broadsheets, specifically the Telegraph who has probably been among the worst offenders. Since they are a "legitimate" paper they would be more likely to positively respond and less likely to make something of the fact that we were writing them. However, as he said, it is hard to see how it could get worse. (I am aware of course it always can, but I think he is right here and it is worth a shot.)

We discussed the definition of pedophilia and I asked upon what basis they could possibly justify using that word. In fact, the age of consent in the UK is 16 and if this act occurred in the UK there would be no "crime" to convict you of. You were convicted of "soliciting prostitution" from a woman 17-3/4 years old. Their rationale, I believe, would be the published stories of accusations that you got a massage from a 13 or 14 year old while they were in their underwear. But these are unproven allegations and in the UK, as you know, the burden of proof is on them. I suggested we could write a letter – not threatening suit – asking the in-house counsel of the tabloids to explain upon what basis they were labeling you a pedophile? His guess is they would say you are on the sex offenders list, but wants to think about it. I said that didn't cut it in my view. The one does not equate to the other. The other argument they would make is your reputation was so badly damaged before this incident that the media's damages would be minimal. I said there is a huge difference between being convicted for having a 17 year old give a massage in her underwear and being called a pedophile in headlines throughout an entire country and indeed the world. What if you could show hundreds of millions of dollars of business/reputational damage? He agreed that was a good point and wanted to think about it.

I agree with you – you cannot just stand there and be a punching bag. I continue to fail to see upon what basis they are labeling you a pedophile. It is my view they are continuing to do it because they are not being challenged. What is the worst they could do if we challenge them/you sue them? Try to find other "girls?" They are already trying to do that. Splash headlines that you are a pedophile? They are doing that.

A very interesting point that Paul made is that Silvio Berlusconi, the Prime Minister of Italy has been all over the papers for having sex with a 17 year old prostitute. No one calls him a pedophile. And you didn't have sex with these masseuses.

One other thought Paul and I discussed. There is something called the Press Complaints Commission in the UK. While a toothless forum, nevertheless, a complaint there gives us the opportunity to make and publicize our case – and does put some pressure on the media. It gives us a forum to tell our side of the story. Only downside is if we lose it could give rise to another round. Still, I fail to see the basis upon which we could lose but I am not a lawyer..