

Annette Witheridge
The Mail on Sunday

Our Ref: PTB\LCL\0\4218705

5 March 2011

Dear Annette

Ghislaine Maxwell

I represent Ghislaine Maxwell. I am in receipt of an email you sent to Brett Jaffe late yesterday calling for a response by noon today.

I have seen the article published in today's Daily Mail.

The allegations made by [REDACTED] [REDACTED] against Ghislaine Maxwell (as at points 1 – 14 of your email) are all entirely baseless, utterly false and without merit.

Ghislaine Maxwell has never been contacted by any police force or other law enforcement agency in connection with any allegations made against Jeffrey Epstein. She has absolutely no connection to the criminal prosecution of Jeffrey Epstein and was neither approached by the defence or prosecution in that matter.

Ghislaine Maxwell has not been named as a party in any proceedings relating to Jeffrey Epstein. Further, no one has at any time even written to Ghislaine Maxwell making any claims against her. It is quite extraordinary that if what [REDACTED] [REDACTED] is saying is her genuine held belief, that she did not add Ghislaine Maxwell as a party to any claim or even write to Ghislaine Maxwell putting her on notice of any such claim.

The only legal process that Ghislaine Maxwell has ever received is a subpoena which was served on her and which she was not required to answer.

One of the lawyers primarily responsible for promoting allegations against Jeffrey Epstein was Scott Rothstein. In June 2010, Mr Rothstein was sentenced to 50 years imprisonment for his involvement in what is reported to have been the largest ever fraud in Florida, a US\$1.2 billion ponzi scheme. He is also the primary defendant in a civil law suit based on his fraud in which the claim is US\$100 billion. He is a man without any shred of credibility. He is a proven liar and someone who has sought to manipulate the law to his own advantage. He is reported as being connected with the making of false claims in relation to Jeffrey Epstein.



██████████ ██████████ has previously made unsubstantiated allegations for sexual misconduct. On at least one other occasion, she claimed to have been sexually assaulted and the government declined to prosecute the case "due to the victim's lack of credibility".

[She also has criminal convictions for offences of dishonesty]

██████████ ██████████ allegations are nothing other than an attempt to seek additional financial windfall by generating publicity and thereby seeking a degree of fame.

Ghislaine Maxwell will be commencing proceedings against the Daily Mail in connection with the article they have published today unless a full retraction and apology are tendered on acceptable terms.

You will obviously appreciate the substantial damage that Ghislaine Maxwell will suffer from the publication of allegations of this nature. If you choose to publish any material you should ensure that you make it clear at the outset of the article and in its heading that the allegations made by ██████████ ██████████ are vehemently denied and that action is going to be taken against the Daily Mail.

Yours sincerely

Philip Barden
Partner

