

JOHNSONS

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14 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 –
Arthur.wynn-davies@telegraph.co.uk**

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 7th and 10th 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 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 broadsheet such as the *Daily Telegraph*, which is supposed to have significantly higher standards than the sensationalised and exaggerated reporting of the tabloids.

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 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,

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together with appropriate redress in relation to your defamatory allegations and malicious falsehoods.

We look forward to hearing from you by return.

Yours faithfully,

A handwritten signature in black ink, consisting of a series of fluid, connected strokes that form a stylized, somewhat abstract shape.

JOHNSONS