

The Editor
News of the World
1 Virginia Street
London
E98 1XY

NOT FOR PUBLICATION

Dear Sir

OUR CLIENT: GHISLAINE MAXWELL
NEWS OF THE WORLD, 5 MARCH 2011

1. As you are aware, we act for Ms Ghislaine Maxwell. We previously wrote to you on 7 March 2011. You have not replied to our letter. This is a Pre-Action letter of claim written in accordance with the pre-Action Protocol for Defamation.

Publications complained of

2. The complaint relates to an article published on pages 4 and 6 in the "News of the World" on 6 March 2011 under the headline "Prince named in Sex Probe" ("the Article").

Word Complained of

3. Complaint is made of the following words:
 - (1) In the first column on page 4, "Legal paperwork held by lawyers in West Palm Beach acting for some of the 14 girls who have lodged suits against 58 year old Epstein also names Prince Andrew's close friend Ghislaine Maxwell, daughter of disgraced publishing tycoon Robert Maxwell and Epstein's social fixer, as a child abuser".
 - (3) In the first column on page 6: "In a lawsuit filed in District Court, a victim identified as "MJ" alleges Epstein was the boss of a "criminal enterprise" involving sex trafficking of young girls. Kellen Marcinkova and Ghislaine Maxwell, 49, were named as co-conspirators. It was Maxwell who first introduced Andrew to Epstein. The document says "Maxwell personally brought underage girls to Epstein for him to sexually abuse. Maxwell was also a participant in sexually abusing minor females".

Factual Inaccuracies in the words complained of

4. The words complained of contain numerous factual inaccuracies. We draw attention, in particular, to the following:
 - (1) Our client is not and has never been "Epstein's social fixer". For a period of time, some years ago, she managed Mr Epstein's properties.
 - (2) Our client is not a "child abuser". She never abused any child nor has she been involved in abuse by any third party. She has never been charged, arrested, questioned or accused of child abuse by any competent authority. She has never been served with any legal proceedings alleging directly or indirectly that she was guilty of child abuse.

- (3) Our client did not traffic in young girls, procure them for sex abuse or participate in such sex abuse. No such allegation has ever been made against her by any competent authority and no legal proceedings making such an allegation have ever been served on her.
5. As we indicated in our letter of 7 March 2011 the allegations against our client are made against the background of a large scale fraud by Mr Scott Rothstein who made and pursued false claims against Mr Epstein. Our client has not seen the "legal paperwork" to which reference is made in the Article and she does not know whether they are among the claims invented by Mr Rothstein as part of his fraud. If you had contacted our client in advance and supplied her with copies of these documents the matter could have been properly investigated.

~~Would you please provide us with copies of the said "legal paperwork" by return in any event. This is discoverable and you should produce it now.~~

Defamatory allegations complained of

6. The words complained of make the false and defamatory allegation that our client is a child abuser, involved in the criminal enterprise of sex trafficking young girls, and procuring them for sex abuse by herself and others.

Factors relevant to damages

7. The allegations in the Article are of the gravest possible nature. They are allegations of serious criminality of the most odious and obnoxious kind. Having decided to publish such allegations without any proper evidential support of any kind, you then seriously aggravated our client's damage by publishing without first giving her the opportunity to respond and refute the allegations. If you had done so, she would have pointed out that the allegations were wholly false and without any foundation whatever. Tellingly, she has never been approached by the authorities or questioned about such allegations, much less been the subject of arrest or charge.
8. The allegations published have caused our client very great distress, which will continue until the removal of the material from the internet and the publication of a full correction and apology.

Remedies sought

9. Our client seeks the following remedies:
 - (1) The immediate removal of the words complained of from the newspaper's website to prevent further damage to his reputation;
 - (2) A statement in open court, together with a full and unequivocal apology to our client to be published in terms and with prominence to be agreed with us.
 - (3) The payment to our client of substantial damages to demonstrate the baseless nature of the allegations and to compensate her for the injury to his reputation and the very considerable distress caused to her and her family.
 - (4) An undertaking not to repeat the allegations or similar allegations to the same effect.

(5) Payment of our client's legal costs in full.

10. [In accordance with the Practice Direction on Pre-Action Conduct, please provide us now with full copies of the "legal paperwork", and "lawsuit" referred to in the words complained of.](#)

~~10.~~11. Please ensure that all documents relevant to this complaint are kept safe, including all material in whatever form touching upon the publication of the allegations.

~~11.~~12. Our client's rights remain entirely reserved and this letter does not restrict those rights in any way.

~~12.~~13. We look forward to hearing from you or your legal representative as matter of urgency. Please acknowledge receipt of this letter by return. We require a substantive response within 7 days.

Yours faithfully

DEVONSHIRES

cc. Tom Crone, Head of Legal, [REDACTED]