
From: jeffrey E. <jeevacation@gmail.com>
Sent: Monday, January 5, 2015 9:15 PM
To: G Maxwell
Subject: Re:

Dear Sir,

Our client: Ghislaine Maxwell

Matter: [REDACTED]

We have previously written to you recording our client's denial of allegations made by [REDACTED] and calling into question the accuracy of reporting.

As a publication regulated by the Independent Press Standards Organisation, you must uphold the Editor's Code of Practice. You will be familiar with this and in particular:

- All members of the press have a duty to maintain the highest professional standards.
- It is essential that the agreed code be honoured not only to the letter, but in the full spirit.
- It is a responsibility of editors and publishers to apply the Code to editorial material in both printed and online versions of publications. They should take care to ensure it is observed rigorously.
- The press must take care not to publish inaccurate, misleading or distorted information.
- A significant inaccuracy, misleading statement or distortion once recognised must be corrected, promptly and with due prominence, and where appropriate, an apology published.

Contrary to the above, you have run a number of articles which accuse our client of having engaged in procuring minors for prostitution, which is obviously a most serious accusation and so requires detailed investigation prior to publication.

The articles date back to March 2011 and remain online via your website even though they contain contradictory accounts, from which it is evident that you knew that material you have published and which denigrates our client, is inaccurate, misleading or distorted.

The stories you have run are based upon information provided to you by [REDACTED]. It would appear that you have taken no effective steps to check the information provided or to investigate [REDACTED].

- On 7 March 2011 you first published allegations under the heading "Epstein's Girl Friday 'fixer' 99: dead tycoon's daughter Ghislaine Maxwell and the girl she hired for paedophile stable".

- On 4 April 2014 you published basically the same allegations again under the heading "The bombshell court document that claims Prince Andrew knew about billionaire friend's abuse of underage girls".

- More recently on 4 January 2015 you published a "world exclusive" under the heading "The first full account of the masseuse at the centre of the explosive Prince Andrew 'sex slave' drama... but is she telling the truth?"

It should have been readily apparent to you from the content of your article on 4 January 2015 that [REDACTED] is not telling the truth.

Your stated sources for the article on 4 January 2015 are "the court documents Ms [REDACTED] lodged in Florida last week" and "we spoke to Ms [REDACTED] twice, the last time just 12 months ago". The other occasion was obviously prior to publication on 7 March 2011.

There is a glaring inconsistency, which you have ignored, between the versions of events you put forward in your article dated 7 March 2011 and what you now say is "the most complete story yet".

The central allegation made by [REDACTED] in your article published on 7 March 2011 is that she was recruited by our client who the same day, took her to Mr Epstein's mansion, where she met and then had sex with Mr Epstein whilst our client was present. Our client emphatically denies that this ever happened.

We wrote to you following publication of these allegations in 2011 and 2014 and you stood by them.

It now emerges that this is not [REDACTED]'s case at all. Rather, that it was somebody else, who is unnamed, and not our client who is alleged to have led [REDACTED] to Mr Epstein's bedroom and who was then present whilst Ms [REDACTED] claims to have had sex with Mr Epstein.

This is an entirely different version of events. It cannot, or should not, have escaped your notice that the story you published this Sunday was so materially different from the allegations previously published that both versions of events cannot be reconciled. As both versions are based on interviews with Ms [REDACTED], she has clearly lied. You should have reported this prominently, and drawn the conclusion that her testimony is unreliable.

Further, you should have conducted a professional investigation, in which you would have spoken to, amongst others, her family and you would then have learnt that her father states that Ms [REDACTED] told him she met the Queen when she came to London. You could have checked that with Buckingham Palace and would have found it to be untrue. This shows Ms [REDACTED] makes up stories.

Further, you ought to have established that [REDACTED] was employed in a burger bar which is wholly inconsistent with her sex slave account. We understand that Ms [REDACTED] left America shortly after her then employer reported that she had stolen money.

We have previously drawn to your attention that Brad Edwards the lawyer filing these claims was the partner of Scott Rothstein who was sentenced to 50 years in prison for in part selling fake Epstein sex settlement cases. in part for forging a judge's signature,

As you know, Brad Edwards, [REDACTED] [REDACTED] current counsel was Rothsteins partner.

Despite the fact that Rothstein=20 was convicted of serious criminal offences of fraud relating to his conduct in generating false claims, that is a matter that you have ignored within your reporting. Any balanced journalism would have looked at the circumstances of the origin of the claim, have investigated its voracity and then taken a view as to whether or not it was accurate before reporting it.

Your reporting has failed to address the material inaccuracies in [REDACTED] account and =ou have used Ms [REDACTED] obviously false allegations to denigrate our=20 client, who as Robert Maxwell's daughter YOU VIEWED AS an easy target.

Ms [REDACTED] claims are =antasy fuelled including the suggestion that she had sex with a famous prime minister. You have not challenged her to name this person as you shou=d have done, as this is yet another fantasy.

It should be apparent to you that Scott Rothstein'S FIRM ORIGINALLY GOT get together=20 to make FALSE AND DEFAMATORY false claims. Had these been properly investigated you would have reported them as such, if you reported them at all.

FURTHER AS YOU ARE FULLY AWARE =ON OF HER CLAIMS HAVE BEEN TAKEN UNDER OATH AND THEREFORE NOT TESTED TO AN= STANDARD OF PROBITY

The above calls for an apology =o our client, RETRACTIONS IN PRINT and a detailed explanation.

Yours faithfully

On Mon, Jan 5, 2015 at 4:=8 PM, G Maxwell <GMax1@ellmax.com <mailto:GMax1@ellmax.com> > wrote:

Draft Letter to the Editor of the Mail on Sunday

Dear Sir,<=p>

Our client: Ghislaine Maxwell

Matter: [REDACTED]

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There is a glaring inconsistency, which you have ignored, between the versions of events you put forward in your article dated 7 March 2011 and what you now say is "the most complete story yet".

The central allegation made by ██████████ in your article published on 7 March 2011 is that she was recruited by our client who the same day, took her to Mr Epstein's mansion, where she met and then had sex with Mr Epstein whilst our client was present. Our client emphatically denies that this ever happened.

We wrote to you following publication of these allegations in 2011 and 2014 and you stood by them.<=>

It now emerges that this is not ██████████ case at all. Rather, that it was somebody else, who is unnamed, and not our client who is alleged to have led Virginia to Mr Epstein's bedroom and who was then present whilst Ms ██████████ claims to have had sex with Mr Epstein.<=>

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Further, you should have conducted a professional investigation, in which you would have spoken to, amongst others, her family and you would then have learnt that her father states that Ms ██████████ told him she met the Queen when she came to London. You could have checked that with Buckingham Palace and would have found it to be untrue. This shows Ms Roberts makes up stories.

Further, you ought to have established that ██████████ was employed in a burger bar which is wholly inconsistent with her sex slave account. We understand that Ms Robert left America shortly after her then employer reported that she had stolen money.

We have previously drawn to your attention that ██████████ was one of the complainants THAT SURFACED=CONTEMPORANOUSLY AND MAY HAVE BEEN generated by Scott Rothstein who was jailed for a substantial period for his part in a Ponzi fraud scheme, which related to encouraging investors to fund litigation against Epstein in respect of which Rothstein produced false claimants.

As you know, Brad Edwards, ██████████ current advisor worked for Rothstein.</=pan>

Despite the fact that Rothstein was convicted of serious criminal offences of fraud relating to his conduct in generating false claims, that is a matter that you have ignored within your reporting. Any balanced journalism would have looked at the circumstances of the origin of the claim, have investigated its voracity and then taken a view as to whether or not it was accurate before reporting it.

Your reporting has failed to address the material inaccuracies in ██████████ account and you have used Ms ██████████ obviously false allegations to denigrate our client, who as Robert Maxwell's daughter YOU VIEWED AS an easy target.

Ms ██████████ claims are fantasy fuelled including the suggestion that she had sex with a former minister. You have not challenged her to name this person as you should have done, as this is yet another fantasy.

It should be apparent to you that Ms ██████████ and Scott Rothstein'S FIRM ORIGINALLY GOT together to make HER FALSE AND DEFAMATORY DEPOSITION false claims. Had these been properly investigated you would have reported them as such, if you reported them at all.

FURTHER AS YOU ARE FULLY AWARE NONE OF HER CLAIMS HAVE BEEN TAKEN UNDER OATH AND THEREFORE NOT TESTED TO AN STANDARD OF PROBITY

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Yours faithfully<=span>

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From: J Jep
Date: Monday, January 5, 2015 at 15=45 PM
To: gmax
Subject: <no subject>

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