

WIGGIN

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BY FAX AND POST

Our ref:
Your ref:

10 May 2011

Johnsons
21 Arlington Street
London
SW1A 1BN

Dear Sirs

YOUR CLIENT: JEFFREY EPSTEIN

We act for the publishers [REDACTED]: our clients have passed to us your letter dated 5 May 2011 and we reply on their behalf.

As you concede in your letter, your client has been convicted of soliciting prostitutes, and procuring a person under 18 for prostitution. He is on America's sex offenders register. He has been served with a number of civil claims for damages. He has, as you note, been widely described as a "paedophile" throughout the media - not simply in the tabloid press.

While the word "paedophilia" as a medical diagnosis is defined as a psychiatric disorder typically characterised by primary or exclusive sexual interest in pre-pubescent children, in popular usage, paedophilia means any sexual interest in children. This common application extends to sexual interest in and abuse of pubescent or post-pubescent minors. In common parlance, therefore, the use of the word "paedophile" to describe your client is correct.

In the circumstances, our clients are not prepared to agree to the publication of a clarification or an apology. Your client's complaint has, however, been noted and in the event that our clients publish any further material concerning your client, your client's points will be borne in mind.

Yours faithfully

Wiggin

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