

Annette Witheridge  
The Mail on Sunday

Our Ref: PTB\LCL\0\4218708

By email: [REDACTED]

5 March 2011

**NOT FOR PUBLICATION**

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.

Your email is represented as containing a number of questions, in relation to which you seek the response of my client. They are not though questions, but rather the repetition of a series of utterly untrue and completely discredited allegations made by a third party. These allegations (as at points 1 – 14 of your email) are all entirely baseless, utterly false and without merit. They are little more than an attempt to seek publicity.

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 neither was she approached by the defence or the 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. If what is being alleged are the genuinely-held beliefs of a third party, the fact that these were never put to my client as a party to any claim is extraordinary. Furthermore, my client was never even put 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, because of the resolution of that matter, she was no longer required to answer.

One of the lawyers primarily responsible for promoting allegations against Jeffrey Epstein has been 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. It is recorded in Court papers that Mr Rothstein made and pursued false claims against Jeffrey Epstein which included promoting allegations of improper conduct of the type you describe.

Mr Rothstein made false claims for fraudulent purposes. It was at the time that these false claims were receiving publicity that [REDACTED] came forward.

[REDACTED] 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".

[REDACTED]' claims are highly defamatory and the publication of them is bound to cause my client loss and damage.

You will be aware of the article published today by the Daily Mail and I would wish you to know that absent a full retraction and apology, proceedings will be brought against the Daily Mail for defamation.

You will appreciate that if you do publish untrue allegations my client will have no option but to protect her position.

Yours sincerely

Philip Barden  
Partner

[REDACTED]