

# EXHIBIT 9

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**From:** gmax <gmax1@ellmax.com>  
**Sent:** Saturday, January 03, 2015 9:46 AM  
**To:** Duke of York  
**Subject:** <no subject>

Have some info – call me when you have a moment – [REDACTED]

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**From:** gmax <gmax1@ellmax.com>  
**Sent:** Saturday, January 03, 2015 7:20 AM  
**To:** The Duke  
**Subject:** Re:

Am on [REDACTED]  
Call me  
Gx

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**From:** Duke of York  
**Date:** Saturday, January 3, 2015 at 5:50 AM  
**To:** gmax  
**Subject:** Re:

Let me know when we can talk. Got some specific questions to ask you about Virginia Roberts.

On 2 Jan 2015, at 23:32, G Maxwell <[GMax1@ellmax.com](mailto:GMax1@ellmax.com)> wrote:

Am home – [REDACTED]  
Cant believe bb was left in the cold :)

Gx

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**From:** Duke of York

**Date:** Friday, January 2, 2015 at 16:54 PM

**To:** gmax

**Subject:** Re:

If you are in the U.S. I'll call you after I've got home from dinner.

On 2 Jan 2015, at 22:52, G Maxwell <[GMax1@ellmax.com](mailto:GMax1@ellmax.com)> wrote:

you still on BBM? have a new BlackBerry pin: [REDACTED]

Gx

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**From:** gmax <gmax1@ellmax.com>  
**Sent:** Friday, January 02, 2015 3:20 PM  
**To:** The Duke  
**Subject:** Re:

Am home – [REDACTED]  
Cant believe bb was left in the cold :)

Gx

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**From:** Duke of York  
**Date:** Friday, January 2, 2015 at 16:54 PM  
**To:** gmax  
**Subject:** Re:

If you are in the U.S. I'll call you after I've got home from dinner.

On 2 Jan 2015, at 22:52, G Maxwell <[GMax1@ellmax.com](mailto:GMax1@ellmax.com)> wrote:

you still on BBM? have a new BlackBerry pin: [REDACTED]  
Gx

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**From:** gmax <gmax1@ellmax.com>  
**Sent:** Friday, January 02, 2015 2:59 PM  
**To:** The Duke  
**Subject:** Re:

Yes  
[REDACTED]

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**From:** Duke of York  
**Date:** Friday, January 2, 2015 at 16:54 PM  
**To:** gmax  
**Subject:** Re:

If you are in the U.S. I'll call you after I've got home from dinner.

On 2 Jan 2015, at 22:52, G Maxwell <[GMax1@ellmax.com](mailto:GMax1@ellmax.com)> wrote:

you still on BBM? have a new BlackBerry pin: [REDACTED]  
Gx

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**From:** G Maxwell <GMax1@ellmax.com>  
**Sent:** Tuesday, January 06, 2015 12:00 AM  
**To:** Dershowitz, Alan  
**Subject:** <no subject>  
**Attachments:** For Press Complaints.docx

Dear Alan

I am preparing a press complaints in the UK and am building a dossier of quotes and items from the papers that have shown to be completely un true or show inconsistency in her story – each article is listed so you can find the link that references the lies or inconsistency

I don't know if it is useful to you, but I thought I would share in case you found it as such

In addition – I found the bellow from the papers that might be of interest with links to the paper they came from – my comments are in red

Virginia, who has undergone counselling to try to come to terms with her past, is honest about her initiation into Epstein's depraved world.

Born in Sacramento, California, in August 1983, Virginia spent her early years on a small ranch on the West Coast of America.

This seemingly idyllic childhood ended when she was sexually molested by a man close to her family. The fallout from that led to her parents temporarily splitting up. Blaming herself, Virginia began to get into trouble. Aged 11, she was sent to live with an aunt but repeatedly ran away.

Read more: <http://www.dailymail.co.uk/news/article-1361039/Prince-Andrew-girl-17-sex-offender-friend-flew-Britain-meet-him.html#ixzz3O0CvGZbP>

Virginia took the sedative Xanax to detach herself from sordid reality. 'It was an escape drug,' she says. 'It made me calm and helped me forget about what I had to do. I was up to eight pills a day.'

'It was a smack in the face,' she says. 'I finally realised this wasn't ever going to be a real relationship but I knew if I refused, I'd be thrown back on the streets. So I said, "I'm too young. I want to get my massage credentials, then maybe we'll do it".' (is the real reason V left because she wanted a child with Jeffrey and was in love with him ?)

'I called Jeffrey and told him I'd fallen madly in love,' Virginia says. 'I was hoping he'd be delighted. But he said, "Have a nice life," and hung up on me.' (Did she want Jeffrey to say no don't do it I will marry you?)

'The first few months after I married Robert were the worst,' she says. 'I couldn't bring myself to tell him much. No man wants to know his wife has been traded out. (were the first months so bad because she wanted to be married to another person?)

'I felt very alone. I was having panic attacks and seeing a psychiatrist and was on anti-depressants.

Read more: <http://www.dailymail.co.uk/news/article-1361039/Prince-Andrew-girl-17-sex-offender-friend-flew-Britain-meet-him.html#ixzz3O0liE4aB>

Just some thoughts

Best

Ghislaine

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I have copied direct lines and quotes from articles and my comments are in orange after the quote..the relevant article that the quotes came from is listed bellow the last quote

Bellow I think as some of the irrefutable contradictions and interesting additional details that can be used in the letter to the mail and in the following press complaints

In addition- this article on Rothstein you may find helpful

[http://articles.sun-sentinel.com/2012-06-26/news/fl-scott-rothstein-ponzi-jeffrey-epstein-20120626\\_1\\_confidential-legal-settlements-ponzi-schemer-scott-rothstein-largest-financial-fraud](http://articles.sun-sentinel.com/2012-06-26/news/fl-scott-rothstein-ponzi-jeffrey-epstein-20120626_1_confidential-legal-settlements-ponzi-schemer-scott-rothstein-largest-financial-fraud)

1. Bill Clinton identified in lawsuit against his former friend and pedophile Jeffrey Epstein who had 'regular' orgies at his Caribbean compound that the former president visited multiple times (huge problem is that Clinton never came to the Island)

Read more: <http://www.dailymail.co.uk/news/article-2584309/Bill-Clinton-identified-lawsuit-against-former-friend-pedophile-Jeffrey-Epstein-regular-orgies-Caribbean-compound-former-president-visited-multiple-times.html#ixzz3O1KVrd1g>

1."It is not claimed that Virginia Roberts and Prince Andrew had sex."

2. Now the *Daily Mail* has persuaded Virginia Roberts to tell her story. (meaning money was paid to her)

3. She was 'given' to several men a world-famous scientist, a respected liberal politician and a foreign head of state. None appeared to find the arrangement unusual. (note not a world famous lawyer, nor an American head of state)

4. They all returned to Ghislaine's home. Andrew later left, but not before Epstein snapped a photograph of Andrew and Virginia, the prince with his arm around the 17-year-old's waist. "I wanted something to show my Mom," she said. ( ie no time did she mention tub or sex w/Andrew)

5. The party flew back to the States and at the end of the trip, Virginia says she was paid \$15,000 by Epstein. "It was amazing money, more than I'd ever made on a trip with him before.

"He didn't say there was any special reason, but I felt like I'd done everything he wanted. He was very pleased." (IE the money given to her was not for a special "massage" for Andrew but for having worked for 6 weeks – or \$357.14 dollars a day)

Read more: <http://www.theweek.co.uk/people-news/7459/jeffrey-epstein-prostitute-how-i-met-prince-andrew#ixzz3NzRxZLGW>

1. "Today, however, even more serious doubts are cast on his suitability after a woman at the centre of the Epstein case revealed to The Mail on Sunday that she had, as a 17-year-old employed by Epstein, been flown across the world to be introduced to the Prince." (Problem here is that she said previously that she went on a 6 week trip ie not just a trip for sex with Andrew which is what is currently claimed)

2"On one of those occasions Virginia Roberts was subsequently paid \$15,000 (£9,400). Her

shocking account of her four years as Epstein's personal masseuse is supported by court documents, an eyewitness, photographs and flight details of Epstein's private jets. (the court documents meaning the unsubstantiated bs deposition not given under oath by virginia to her lawyers for a civil suit created that was created under Rothstein who has gone to jail for 50 year for creating and selling false suits?? And should be noted has been settled)

3He was first seen with the pair on holiday in Thailand, ( I have never been to Thailand with Prince Andrew)

4.Read more: Over the course of a week during which she spoke at length to The Mail on Sunday, she appeared sometimes vulnerable, and sometimes steely, but always quietly resolute and consistent. (the interview lasted a week!)

Some recollections – and, for reasons of taste, not all the details can be included here – caused her to flush with shame. 'I'm telling you things that even my husband didn't know,' she said. (the mail refers to using taste to not disclose details..versus fact)

Read more: <http://www.dailymail.co.uk/news/article-1361039/Prince-Andrew-girl-17-sex-offender-friend-flew-Britain-meet-him.html#ixzz3O0CPqqax>

1.They included a well-known businessman (whose pregnant wife was asleep in the next room), a world-renowned scientist, a respected liberal politician and a foreign head of state.

None appeared to think the arrangement was unusual. Virginia says there were many other girls in Epstein's circle and that she was paid extra money to help recruit them. (note Virginia admits to finding women for JE + note no mention of world famous lawyer)

2.Jeffrey bought me jewelery – diamonds were his favourite – and wonderful furniture. He was paying me very well because I'd give him sex whenever he wanted it.' (if he was paying her so well why steal from her burger job 2002?)

3.She was, she says, delighted when Epstein invited her to accompany him on a six-week trip in 2001.

4.On the last leg of the trip, Virginia was paid about \$15,000 (£9,400) by Epstein. 'It was amazing money, more than I'd ever made on a trip with him before. He didn't say there was any special reason, but I felt like I'd done everything he wanted. He was very pleased.' (so not special for Andrew as is alleged)

5. She met Andrew for the third and final time on Epstein's Caribbean island, Little Saint James. Virginia was never under the British legal age of consent when she met Andrew. She was 17 during the first two encounters and 18 at the third.

Read more: <http://www.dailymail.co.uk/news/article-1361039/Prince-Andrew-girl-17-sex-offender-friend-flew-Britain-meet-him.html#ixzz3O0Iq2z84>

1.On one occasion, she adds, Epstein did invite two young brunettes to a dinner which he gave on his Caribbean island for Mr Clinton shortly after he left office. But, as far as she knows, the ex-President did not take the bait.

'I'd have been about 17 at the time,' she says. 'I flew to the Caribbean with

Jeffrey and then Ghislaine Maxwell went to pick up Bill in a huge black helicopter that Jeffrey had bought her. (Clinton has never been to the island)

2. Virginia disclosed that Mr Clinton's vice-president Al Gore and his wife, Tipper, were also guests of Epstein on his island. ( they have also never been to the island and don't believe they even know JE)

'I had no clue that anything was up,' Virginia says. 'The Gores seemed like a beautiful couple when I met them. All I knew was that Mr Gore was a friend of Jeffrey's and Ghislaine's. Jeffrey didn't ask me to give him a massage. ( I am not a friend of the Gores nor have ever been)

Read more: <http://www.dailymail.co.uk/news/article-1363452/Bill-Clinton-15-year-old-masseuse-I-met-twice-claims-Epsteins-girl.html#ixzz3O0KOlk222>

1. After the first encounter, Jeffrey Epstein paid Roberts \$15,000 in cash. (contardiction in previous when she says she ws paid when she got back to US after a working for 6 weeks) A photo taken at the time showed Andrew standing in his shirtsleeves with an arm round her bare midriff. There is, however, no suggestion that the Duke was involved in any form of sexual exploitation. (diff from spending 6 weeks working)

2. In the past, whenever the Epstein case has been reported, it has been claimed there is no suggestion that Andrew was ever aware that the tycoon paid under-age girls for sex.

But in Exhibit D, Roberts alleges otherwise.

Asked whether the Prince would have 'relevant information' about 'Jeffrey's taking advantage of under-age girls', she replies: 'Yes, he would know a lot of the truth.' ( not sure I actually do have exhibit d)

3. We have passed copies of it to lawyers for Mr Epstein and Mrs Maxwell, as well as a representative of the Duke of York, seeking their response. At time of going to print, none had formally commented. (exhibit d never given)

4. The story it tells begins in 1998, when Virginia Roberts was a troubled 15-year-old. Raised in a broken home, she was first introduced to Epstein — then aged 45 — by Ghislaine Maxwell, after meeting her at a Florida spa where Roberts worked as a changing-room attendant.

After telling her she was interested in studying massage therapy, Roberts alleges she was 'prompted by Ghislaine to come to Jeffrey's mansion in Palm Beach that afternoon to make some extra money, and to learn about massage'.

She claims to have arrived at the property between 5pm and 6pm.

She was taken directly to Epstein's bedroom, where she found him, face down, 'lying naked on top of the massage table'.



It is claimed that for more than half an hour, Ms Maxwell, who was then 36, and Epstein instructed her to give him what was 'actually a real massage'.

But then, she alleges, the mood changed. 'He turned over on the other side, to expose himself fully,' she recalls. (now recanted and said another women)

'Then Ghislaine told me that she wanted me to undress and began to take off my shirt and skirt... she also took off her skirt and got undressed, and so I was there with just my undies on.'

***'Jeffrey told me to wash him up and down with a bar of soap. After the encounter was finished, he told me I did well and I have a lot of potential to become a massage therapist'*** (other accounts say I said she did well and the last one of course says I was not present)

**Virginia Roberts**

The naked Maxwell then instructed 15-year-old Roberts to perform a series of sex acts on Epstein, the account states. 'Fearful' of 'upsetting or disappointing' the powerful duo, the teenager agreed.

Afterwards, 'Jeffrey told me to wash him up and down with a bar of soap', she alleges. 'They were very pleased with me.'

'After the encounter was finished, the sexual encounter, [Epstein] told me I did well and I have a lot of potential to become a massage therapist, and if I'd like I could return tomorrow, you know, and do the same thing and get paid \$200 an hour.'

5. Several months after she began working full-time for Epstein, Roberts claims that he began to pay her to provide erotic massages to his male friends. (in other accounts it is after 2 years he 'lent her out')

Read more: <http://www.dailymail.co.uk/news/article-2597308/The-bombshell-court-document-claims-Prince-Andrew-knew-billionaire-friends-abuse-age-girls.html#ixzz3O0NENXTJ>

1. Andrew and the under-age 'sex slave': Duke denies claim in court papers that teen was picked to sleep with him by Robert Maxwell's daughter (how do you make that leap??)

2. Prince Andrew abused an underage girl at an orgy where she was being used as a sex slave, it was sensationally claimed last night.

In an extraordinary legal allegation, a woman said she was 'forced' to have sex with him at parties in London, New York and the Caribbean. (now it is an orgy even in london)

3. Jane Doe #3 claims she 'was forced to have sexual relations' with the prince when she was under the age of consent.

4That stage of his alleged abuse started after two years when he asked Miss Roberts to fly to his Caribbean island and make a friend of his 'feel how you make me feel'. (again cant have it both ways either abuse stated immediately or 2 years later)

5The following morning, Miss Maxwell allegedly told her: 'You did well. He had

fun.' At the time of that interview, there were no claims that the prince had been involved with Miss Roberts. (so did she didn't have sex with him in London )

6Her final encounter with the prince was on Epstein's Caribbean island, by which time she was 18. ...

Read more: <http://www.dailymail.co.uk/news/article-2894911/Andrew-age-sex-slave-Duke-denies-claim-court-papers-teen-picked-sleep-Robert-Maxwell-s-daughter.html#ixzz3O0SKcmzU>

This looks like evidence D

#### **1.ALLEGATIONS OF SEX IN LONDON, NEW YORK AND THE CARIBBEAN**

The claim filed at Florida district court in West Palm Beach by the woman known as Jane Doe #3 includes allegations that:

'Epstein sexually trafficked the then-minor Jane Doe, making her available for sex to politically-connected and financially-powerful people.

'Epstein's purposes ... were to ingratiate himself with them for business, personal, political and financial gain, as well as to obtain potential blackmail information.



Virgin Islands: The girl claims she was made to have sex with Prince Andrew in Epstein's villa, pictured

'One such powerful individual Epstein forced [alleged victim] Jane Doe #3 to have sexual relations with was a member of the British royal family, Prince Andrew, aka Duke of York.

'Jane Doe #3 was forced to have sexual relations with this prince when she was a minor in three separate geographical locations: in London (at Ghislaine Maxwell's apartment), in New York and on Epstein's private island in the US Virgin Islands evidence doc D which virginia her self contradicts in interviews with mail..scarola (lawyer) alegedly took this over a phone conversation)

'Epstein instructed Jane Doe #3 that she was to give the prince whatever he demanded and required Jane Doe #3 to report back to him on the details of the sexual abuse.

'Maxwell facilitated Prince Andrew's acts of sexual abuse by acting as a 'madame' for Epstein, thereby assisting in internationally trafficking Jane Doe #3 (and numerous other girls) for sexual purposes.

'Epstein also trafficked Jane Doe #3 for sexual purposes to many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well known prime minister, and other world leaders. (note no lawyer)

'Epstein required Jane Doe #3 to describe the events that she had with these men so that he could potentially blackmail them. Maxwell was another person in Epstein's inner circle and co-conspirator in Epstein's sexual abuse.

'In addition to participating in the sexual abuse of Jane Doe #3 and others, Maxwell also took numerous sexually explicit pictures of underage girls involved

in sexual activities.

'Maxwell herself regularly participated in Epstein's sexual exploitation of minors, including Jane Doe #3.

'Maxwell persuaded Jane Doe #3 (who was then 15 years old) to come to Epstein's mansion in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children.

'Epstein kept Jane Doe #3 as his sex slave from about 1999 through 2002, when she managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years.'(previously she claimed she met in 1998 here in exhibit D 1999 - if it was "99 then she was 16..)

Indeed, the Daily Mail has previously stressed that none of the claims about the prince has been corroborated, and that they have yet to be tested in a court of law.B (why not stress this more)

Read more: <http://www.dailymail.co.uk/news/article-2894911/Andrew-age-sex-slave-Duke-denies-claim-court-papers-teen-picked-sleep-Robert-Maxwell-s-daughter.html#ixzz3O0Ungs00>  
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1. She claims Prince Andrew had sex with her when she was 17 – a minor under US law – and employed as a 'sex slave' by Epstein. (not in all states and not in uk)

Read more: <http://www.dailymail.co.uk/news/article-2897753/Ghislaine-Maxwell-woman-accused-facilitating-Prince-Andrew-s-acts-abuse.html#ixzz3O0f2QNYw>  
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1. Now, thanks to the court documents Miss Roberts lodged in Florida last week, The Mail on Sunday can publish the most complete story yet of how this young woman was exploited by Epstein's shuttered world of seedy sex and influence. We spoke to Miss Roberts twice, the last time just 12 months ago. While fragments of her testimony to us were reproduced last week, only now can we present her comprehensive account with previously unpublished material (what they mean is just additional un proven stories which contradict in major ways previous comments and quotes from her and her own deposition)

2Last week it was sensationaly claimed that Prince Andrew had taken part in what, it was implied, was sex with a girl who was under the age of consent according to the law in Florida. As the papers lodged in the Palm Beach court spell out: 'Epstein forced Jane Doe 3 to have sexual relations with a member of the British Royal Family, Prince Andrew (aka Duke of York). (previously said she had not had sex with him)

3Andrew was photographed surrounded by topless women during one holiday with them in Thailand ( I was never in Thailand with Andrew)

4'Another lady led me into Jeffrey's bedroom. It had a king-size bed, (so not me)

5The lady gave me \$200 [£130] and said I was to come back the next day.'  
Previously sd I had paid her

6Miss Roberts makes the extraordinary claim that she was paid about \$15,000 (just under £10,000) by the 58-year-old Epstein as a reward for sleeping with the Prince and other sexual

services for Epstein. (again he paid her by her own quote above for 6 weeks of work – about 350 a day)

Read more: <http://www.dailymail.co.uk/news/article-2895735/The-account-masseuse-centre-explosive-Prince-Andrew-sex-slave-drama-telling-truth.html#ixzz3O0yoOpPs>

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1. Sky Roberts, 58, also claimed his daughter Virginia had been introduced to the Queen while visiting London with billionaire financier Jeffrey Epstein. (manifestly not true)

Read more: <http://www.dailymail.co.uk/news/article-2897615/Prince-Andrew-s-sex-slave-Virginia-Roberts-writing-tell-memoir.html#ixzz3O14HRq9F>

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1. It was reported that she was flown across the world to be introduced to the Prince. On one of those occasions Virginia Roberts was subsequently paid \$15,000 (£9,400). (again either it was a 6 week trip or not make it sound like she flew just for Andrew)

Read more: <http://www.dailymail.co.uk/news/article-2897615/Prince-Andrew-s-sex-slave-Virginia-Roberts-writing-tell-memoir.html#ixzz3O1534Apb>

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1. Andrew and the under-age 'sex slave': Duke denies claim in court papers that teen was picked to sleep with him by Robert Maxwell's daughter

Read more: <http://www.dailymail.co.uk/news/article-2894911/Andrew-age-sex-slave-Duke-denies-claim-court-papers-teen-picked-sleep-Robert-Maxwell-s-daughter.html#ixzz3O15tQqAc>

1. 'We all dined together that night. Jeffrey was at the head of the table. Bill was at his left. I sat across from him. Ghislaine was at Bill's left and at the left of Ghislaine there were two olive-skinned brunettes who'd flown in with us from New York.

'I'd never met them before. I'd say they were no older than 17, very innocent-looking.

'They weren't there for me. They weren't there for Jeffrey or Ghislaine because I was there to have sex with Jeffrey on the trip. Maybe Jeffrey thought they would entertain Bill, but I saw no evidence that he was interested in them. He and Jeffrey and Ghislaine seemed to have a very good relationship. Bill was very funny.

'After dinner I gave Jeffrey an erotic massage. I don't remember seeing Bill again on the trip but I assume Ghislaine flew him back.' (Clinton never at the Island)

Read more: <http://www.dailymail.co.uk/news/article-2894911/Andrew-age-sex-slave-Duke-denies-claim-court-papers-teen-picked-sleep-Robert-Maxwell-s-daughter.html#ixzz3O17IUiUS>

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1. Virginia Roberts' father, Sky, has alleged his daughter had been introduced to the Queen in 2001. A Buckingham Palace spokesman has rejected the allegation, saying they had no

record of such a meeting.

"She was so excited about meeting the Queen," Sky Roberts told the UK's *The Sun*. "She had been flown to London by Jeffrey. He would fly her all over the world on his private jet." (evidence of the fantastical stories she tells)

[www.smh.com.au/world/virginia-roberts-new-lease-on-life-after-escaping-from-billionaire-sexual-predator-jeffrey-epstein-20150105-12i9f8.html](http://www.smh.com.au/world/virginia-roberts-new-lease-on-life-after-escaping-from-billionaire-sexual-predator-jeffrey-epstein-20150105-12i9f8.html)

1.Ghislaine Maxwell: 'I was not a madam for paedophile' (never made that statement)

<http://www.express.co.uk/news/world/550085/Ghislaine-Maxwell-Jeffrey-Epstein-not-madam-paedophile-Florida-court-case-Prince-Andrew>

1.Virginia claims the first time she met the Duke, 54, was when she -accompanied pervert Epstein on a six-week trip to Europe and North Africa in 2001.

While in London they reportedly visited the billionaire's friend, Ghislaine Maxwell, daughter of disgraced tycoon Robert Maxwell.

Little has been revealed about the events that took place in London – where she would have been over the legal age for sex. But Virginia's interview provides alleged details of how she was seduced by the Prince.

<http://www.mirror.co.uk/news/uk-news/prince-andrew-underage-sex-slave-4915304>