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Strictly Private & Confidential

our ref: CL/DMC/MOR265/0001

26 June 2018

By Post & Email: mechanima@gmail.com

Re: OUR CLIENT: RACHEL MORAN

Dear Madam

We act on behalf of our above named client in relation to defamatory statements which you have published concerning her.

Our client is a recognised international speaker with an excellent reputation for promoting the safeguarding of women's rights. She has a particular interest in changing social attitudes towards prostitution and pressing for its recognition as a sexually exploitative human rights violation. She speaks regularly at the United Nations in New York, the European Parliament in Brussels and has spoken numerous times at Columbia and Harvard Universities and other noted international places of learning.

Our client has an exceptional reputation for promoting women's rights. She is the founding member of SPACE International and author of the bestselling book *'Paid For - My Journey Through Prostitution'*.

"Paid For" details the seven years our client spent prostituted in Dublin and around Ireland, giving a powerful analysis concerning the realities of life in prostitution and the exploitation which she and others suffered. Our client received glowing reviews worldwide for her compelling and insightful narrative.

We are instructed that you, over the course of a number of years have engaged in a continuous campaign of defamation of our client. We have reviewed a wide range of statements which you have published on Twitter and elsewhere. A selection of the allegations you have made include the contention that our client is a *"fraud,"* that she is *"one of those crooks who will literally do anything for money,"* that she is *"a liar who was never there"* and that she is *"a total fake."*

You assert repeatedly that our client was never in prostitution and that she has lied repeatedly in her book and in her numerous public appearances. These allegations that our client is a liar and a fraud and that she presents a false story on a regular basis are defamatory statements

within the definition of the Defamation Act 2009. We are instructed by our client that your assertions and allegations to this effect are wholly untrue.

In this sustained campaign of harassment you have also sent defamatory statements about our client to her publishers and to various media outlets that she has written for in her capacity as a journalist in Ireland, Britain and the United States. You also maliciously published our client's home address to the general public on social media.

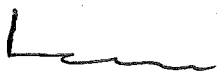
Our client should not have to answer these groundless, baseless and untrue accusations. Nonetheless, she has addressed them and produced proof of her life in prostitution. This proof includes a video containing evidence of a newspaper article detailing her arrest at a Cabra brothel when she was 16. The video also includes an interview with Detective Alan Bailey who confirms he arrested our client for working in prostitution when she was 16. The video is featured as a pinned tweet on our client's Twitter page.

Our client has a Constitutional right to a good name, which she is determined to defend. We now call on you to:

1. Provide a written apology for the damage caused by your Twitter and other posts together with confirmation that the posts are untrue.
2. Remove all Twitter and forum posts which relate to our client from any social media or other online accounts under your control.
3. Provide a written undertaking to refrain from posting any further content in relation to our client online or at all again (on your own personal accounts or any accounts controlled by you.)
4. Revert to us with your proposals to compensate our client for the damage caused to her reputation.

If you fail to comply with the above points 1 - 4 within 7 days our client intends issuing court proceedings against you in order to defend her good name without further notice. Please note that this letter will be used to fix you with the costs of any proceedings.

Yours faithfully



LAVELLE SOLICITORS