

KOBRE & KIM (UK) LLP

TOWER 42
25 OLD BROAD STREET
LONDON EC2N 1HQ
WWW.KOBREKIM.CO.UK

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BY EMAIL & COURIER

23 April 2019

Sr Don Jaime Alfonsin Alfonso
Head of the Royal Household of His Majesty
the King of Spain
Palace of La Zarzuela
Carretera del Pardo s/n
28071 Madrid
Spain

Dear Sir,

We refer to recent correspondence in relation to our client, Ms. Corinna zu Sayn-Wittgenstein, and in particular to your letter of 21 March 2019.

Our Client is deeply concerned by the position you have adopted in that letter. Your refusal to commence formal good faith negotiations or to designate a representative to open a communication channel or otherwise initiate discussions of any kind with her is a mistake. It suggests that you do not understand the seriousness of the issues set out in the 21 March 2019 letter and their possible impact on the Royal Household. Your immediate response, on receiving the letter, was to send the King Emeritus to call on our client (as recorded in our letter to you dated 18 March 2019). Our Client was willing to meet the King Emeritus in good faith and, indeed, she considered this a promising first step. It should, however, be clear that the issues raised in our 5 March letter do not touch merely upon the King Emeritus himself, or individuals only loosely connected with the Royal House. They go to the very heart of the Royal House, its financial affairs, and its intimate connections with the Centro Nacional de Inteligencia. The King Emeritus is not the person to resolve these issues alone. Our Client explained this repeatedly to the King Emeritus at their meeting. In particular, our Client told the King Emeritus several times that the meeting in question was a first step and that the next step was for formal discussions to take place between our Client and her advisors and the Royal Household. Our Client does not presume to dictate who the Royal Household designates for those discussions, but plainly it has to be someone with the seniority and authority to represent the *current* Royal Household. The King Emeritus does not have (and did not claim to have) that authority.

Your refusal to engage with our Client through formal channels is, in fact, counter-productive. The facts and matters set out in the 5 March letter are being raised with

increasing frequency in the public domain, as is the fact of our Client's diplomatic and other reasonable attempts to communicate with the Royal House. You will have seen that the Spanish¹ and international press has begun to publish articles touching upon the truth of certain issues raised in the 5 March letter, including The Times in London.² Our Client will also be called upon in the coming weeks to provide further testimony to assist the investigation in Switzerland into the Lucum foundation. The outcome of that investigation will directly implicate the interests of both His Majesty King Felipe VI and the Infanta Leonor, both of whom are beneficiaries of the Lucum foundation. Our Client will further assist the prosecutor on any investigation into other structures. She will also be providing testimony in support of José Manuel Villarcjo Pérez's defence in the case against him for slandering General Sanz Roldán.

The 5 March letter raised issues that, for the benefit of all concerned, should be managed with the greatest possible sensitivity. In particular, given the concerns of the prosecuting authorities in Switzerland, the potential consequences of mismanaging the Royal House's involvement in the investigations there could be extremely damaging for the Royal Household. Our Client has nothing to fear from the truth of any of the matters in the 5 March letter being thoroughly investigated, or from any expansion in the scope of the investigations in Switzerland. However, it would plainly be sensible, and in the interests of those you represent, to advance a constructive dialogue on these issues. It would also be sensible to ensure that the Royal House employs the appropriate individuals to manage these delicate issues in future. We stress again – and this is a point of the utmost importance – that our Client is not seeking to harm the Royal Household or making threats to force a discussion. On the contrary, our Client believes that her interests and those of the Royal Household are or ought to be aligned on these issues, at least to the extent that all parties should want a quick, discreet and amicable resolution of the matters in issue.

For these reasons, our Client wants to ensure that your refusal to engage with these issues is made on an informed consideration of the situation. She repeats her offer to enter good faith negotiations with a representative of the Royal Household. This is the last time our Client will be able to make this offer given the pace of the legal proceedings in Switzerland and Spain. If it is refused, our Client will have no choice but to set the record straight in the press and when she is called upon to give evidence under oath, including in Spain and Switzerland. If we do not hear from you further by 3 May 2019, our Client will have no choice but to take this course.

Finally, you asked us in your letter not to direct further correspondence to J&A Garrigues. We have not copied them into this letter. We invite you as a matter of urgency to confirm that the Royal Household is represented for the purpose of any proceedings arising in relation

¹ See, for example, <https://okdiario.com/opinion/audiencia-nacional-no-puede-permanecer-impasible-3927978>; <https://okdiario.com/investigacion/zarzuela-cni-utilizaron-corinna-pantalla-tapar-broker-irani-3928449>; <https://okdiario.com/investigacion/juan-carlos-recomendo-comisionista-del-ave-meca-carta-principe-saudi-3928399>; <https://okdiario.com/investigacion/medios-todo-mundo-senalan-zanganeh-como-comisionista-del-ave-3928364>; <https://okdiario.com/investigacion/zanganeh-belleza-persa-amante-marbella-bien-relacionada-ayatolas-iran-3928454>; <https://okdiario.com/investigacion/traficante-armas-kashogui-otra-amistades-peligrosas-del-rey-3928460>

² <https://www.thetimes.co.uk/article/ex-mistress-of-king-juan-carlos-claims-spies-threatened-her-if-she-spoke-of-affair-wxvpzk0gl>

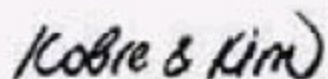
Don Jaime Alfonsín Alfonso

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to matters set out in the 5 March letter by the State Attorney General, currently Consuelo Castro Rey. Our Client is willing to communicate directly with the Ministry of Justice and the State Attorney General in respect of these matters in order to ensure that the Royal House is properly informed and effectively represented.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Kobre & Kim".

Kobre & Kim (UK) LLP

cc: The Private Secretary to Her Majesty Queen Letizia