

# KOBRE & KIM (UK) LLP

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**PRIVATE & CONFIDENTIAL**  
**BY COURIER**

5 March 2019

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

Dear Sir,

We write on behalf of our client, **Ms. Corinna zu Sayn-Wittgenstein**, in order to bring important facts to the attention of Their Majesties and to open a confidential channel of communication with the Royal Household and its legal representatives.

Our Client's intention is to reach in good faith an end to the campaign of defamation and intimidation she has suffered for the past seven years at the hands of the King Emeritus Juan Carlos I of Spain and General Félix Sanz Roldán, Director of the Centro Nacional de Inteligencia. She also intends to have the public record set straight. That same campaign has caused the Royal Family considerable embarrassment and continues to imperil its reputation. Our Client therefore believes a constructive dialogue on these matters, as a first step, to be in the interests of both parties.

Our Client's previous attempts to communicate with the Royal Household, including through diplomatic channels, have been systematically blocked. Accordingly, after seven years of attempting to reach a resolution without engaging in formal, legal or other public actions, this letter is our Client's final attempt to convey her offer of collaboration on this issue with your institution. **We ask that you confirm receipt by close of business on Monday, 11 March, indicating whether you or another representative of the Royal Household is authorised to enter into good faith discussions on this matter with our Client or her representatives.**



### **The Campaign of Defamation**

Ms. Sayn-Wittgenstein is the victim of a sustained smear campaign pursued through the fabrication and placement of hundreds of false news articles in the Spanish media and repeated in the international press. In 2012, General Sanz Roldán, by his own admission to our Client, deliberately leaked details of the King Emeritus' trip to Botswana to the press, thereby setting in motion a media maelstrom that caused serious harm to our Client, the King Emeritus, and the Spanish Monarchy. The campaign of defamation has since continued and intensified.

Though the campaign appears to have been pursued with the intention of using our Client as a front or scapegoat for misconduct carried out by the King Emeritus and individuals close to or within the Royal Family, it has in fact eroded the reputation of the King Emeritus and the Royal Household.

General Sanz Roldán has informed our client both orally and in writing that he has acted on instructions and with the full knowledge of the King Emeritus. However, serious questions arise as to whether the General has exceeded the bounds of his instructions, and as to the motivations behind his attacks.

It is however beyond doubt that as a result of this ongoing campaign, our Client has suffered irreparable damage to her business and her reputation. These defamatory and fictitious articles have also prompted criminal investigations in Switzerland in which the King Emeritus is now heavily implicated.

The following financial matters are examples of the myriad false allegations that have been leveled against our Client:

#### **Lucum**

- In 2012, our Client received from the King Emeritus a fully invested bank portfolio held at Bank Mirabaud in Geneva in a foundation called "Lucum". The beneficiaries of this foundation are The King Emeritus, His Majesty King Felipe VI and the Infanta Leonor. This gift was unsolicited and presented as irrevocable. The King Emeritus' Swiss legal representative, Dante Canonica, explained to our Client that the funds originated from a gift to the King Emeritus from the late King Abdullah of Saudi Arabia in 2008. These facts are documented.
- In 2014 the King Emeritus demanded that our Client return those funds. When, on the advice of Swiss counsel, our Client refused to do so in order to avoid potential accusations of financial misconduct, the King Emeritus falsely accused our Client of having stolen the assets.



## AVE

- Tens of fake news articles have appeared in the Spanish media accusing our Client of taking a large commission from the AVE to Mecca Saudi Train Deal. As the King Emeritus is well aware, our Client was not involved in this deal in any capacity.

## Ferrari

- In 2011 his Highness Sheikh Mohammed bin Zayed Al Nahayan, the Crown Prince of Abu Dhabi, gifted one Ferrari to the King Emeritus and one to his son Felipe, the then Prince of Asturias. Fake news articles appeared in the Spanish media falsely accusing our client of being the recipient of these cars. The Royal Household tacitly implicated our Client by deliberately failing to clarify the true position in respect of this gift when questions as to its origin arose.

## NÓOS

- Members of the Royal Household implicated our client in the Nóos scandal, it would appear in order to protect HRH the Infanta Cristina. Despite assurances from the King Emeritus and the Former Head of the Royal Household, Mr Rafael Spottorno, that our Client's name would be cleared in the Nóos investigation, both Mr Iñaki Urdangarin and the Private Secretary to the Infanta, Mr Carlos García Revenga, to all appearances deliberately failed to set the record straight during their February 2013 court hearing, thereby creating the false impression that our Client was involved in the relevant financial crimes. In 2013, the judge investigating the Nóos case rightly refused to call our Client as a witness despite several requests to do so by an associate of Mr Urdangarin's, Mr Diego Torres.

Our Client has so far endured these attacks without substantively responding because of her respect for the Institution of the Monarchy. She remains open to finding a common solution. However, the actions of the King Emeritus and General Sanz Roldán have not only created conditions in which she is forced to defend herself publicly, but also a personal security crisis for our Client.



Don Jaime Alfonsín Alfonso  
5 March 2019

### Request for Dialogue

Ms. Sayn-Wittgenstein has suffered in silence for seven years while her reputation, professionalism, personal and family life have been attacked. She has not sought to defend herself in the media, as she does not wish to expose herself or her children to further publicity.

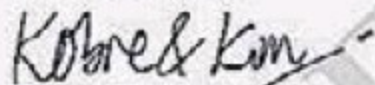
Our Client strongly believes that her interests and those of the Royal Family are aligned, and that each party can assist the other by exchanging pertinent information, by taking concerted action to counter falsehoods, and in order to handle what is certain to become an even greater public issue than it already is, in light of judicial developments in Geneva. **She, either in person or through her advisers, is prepared to discuss how to proceed.**

We should be grateful if you would confirm receipt by close of business on Monday, 11 March, indicating whether you or another representative of the Royal Household is authorised to enter into discussions on this matter with our Client or her representatives.

We are sending copies of this letter to the Private Secretary of HM Queen Letizia, and to J&A Garrigues S.L.P.

We await your response by that date. If no response is received our Client will exercise in full her right to defend herself.

Yours faithfully,



Kobre & Kim (UK) LLP

cc: The Private Secretary to Her Majesty Queen Letizia

Sr Ricardo Gómez-Barreda, Senior Partner, J&A Garrigues, S.L.P