

27 November 1991

[REDACTED]
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PRIVATE AND CONFIDENTIAL

Dear [REDACTED]

re: [REDACTED] - Peter Ellis

I have been asked to act for Peter Ellis.

I have received (from a source other than Peter) a copy of a letter written by you both dated 20 November 1991 making certain allegations about Peter. This is an open letter, addressed "To whom it may concern".

As you will have been advised when matters of this sensitive nature arise, the only body or organisation to whom information should be communicated is the police. The police have the power to investigate the matter, obtain evidence (if available), lay charges and advise relevant persons (including the defendant's employer) that a charge has been laid.

This is because a persons reputation and often livelihood would inevitably be at stake.

In this case I have received information from several independent sources which seem to indicate:-

- (a) That you have communicated directly with Peter's employers.
- (b) That you have circulated your above letter and that it has got into the hands of several persons.
- (c) That you have discussed the situation with a number of people including Civil Child Care Centre personnell and other parents whose children attend the Centre.
- (d) That there is doubt that you have filed a complaint with the police. (Certainly Peter has received no approach from the police.)

As you are also aware, Peter is absolutely shattered by the suggestions that you have made, and totally denies any inappropriate conduct. He has been further distressed by the feedback he has been getting from a number of sources that the matter has been publicised in the manner described above. He feels that his reputation has suffered irrevocable damage and that he may lose his job. [REDACTED] fears have also been expressed to me by independent persons that the reputation of the Centre has also been damaged by your actions.

You will be aware that damages for defamation in circumstances such as this could be extremely heavy.

My purpose in writing is to advise you immediately to stop all discussions of this matter with anyone but the police or persons authorised by the police. If you have not yet filed a complaint with the police then you must either do so immediately or withdraw your suggestion that Peter has been involved in anything improper. You must also see your solicitor (whom you have presumably previously consulted about this matter) and show your solicitor this letter, as I shall need to discuss with your solicitor the implications of your actions to date.

Please treat this matter with the utmost seriousness.

Yours faithfully

Chris Knight

Copy to Peter Ellis