

Our Ref: PT/BC/ME00010203

25th February 2015

Telegraph Media Group
[REDACTED]

FAO: Mr [REDACTED] Legal Department

BY EMAIL:
[REDACTED]

Dear Sirs,

We have been consulted by the photographer John Russo in relation to the unlawful and unauthorised publication of an altered photograph of the model Cindy Crawford, in blatant breach of his copyright, and with accompanying articles in the print and online editions of *The Telegraph* and *The Sunday Telegraph* under the headlines **"Unretouched photo of Cindy Crawford causes a Twitter storm"**, **"Cindy Crawford should cover up now"** and **"A hollow cheer for Crawford"**

Not only have you published what was a stolen and doctored photographic image, but you have also sought to afford credibility to what is a fraudulent photograph by describing this as, inter alia, *"a leaked, un-retouched photograph of the presumed perennially perfect supermodel"* and *"Cindy Crawford in her un-touched Marie Claire photos"*, and in the tenor and content of your article inferring that Cindy Crawford had endorsed and authorised the photograph. Attached is a sworn declaration by Mr. Russo declaring that the image was stolen, has been significantly altered and that the photograph was released without either his or Ms. Crawford's knowledge or consent.

Our client is entitled to, and requires, the following:

- i) The immediate removal of the offending photograph and articles, from your websites;
- ii) Your undertaking not to re-publish the subject photograph; and
- iii) The publication of a categorical clarification and apology, in terms and in a manner to be first agreed with us but including a statement that you have learned that the image/photograph was stolen, it has been significantly doctored/alterd and does not accurately reflect the original image and it was released without either the photographer's or Ms. Crawford's knowledge or consent.

We await hearing from you within the next forty eight hours, failing which our client will take all appropriate steps to protect his legal rights and those

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of Cindy Crawford. In the meantime he is reserving all his rights, including his right to seek substantial damages.

We await hearing from you.

Yours faithfully,

A handwritten signature in black ink, appearing to be a stylized 'J' or 'K' followed by a horizontal line.

JOHNSONS

TMZ

Statement of Truth

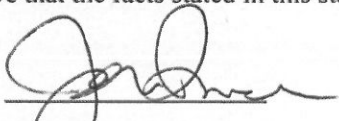
SWORN STATEMENT OF JOHN RUSSO

I, John Russo of [REDACTED] Beverly Hills, California, USA, say as follows:

1. I make this witness statement to the extent that facts and matters set out are true within my own knowledge.
2. I am a world-renowned celebrity and fashion photographer. I have conducted photo shoots with Angelina Jolie, Brad Pitt, Julia Roberts, and John Travolta among others. My work has been featured on the covers of many international editions of *Vogue*, *Harper's Bazaar*, *GQ*, *Esquire* and *Maire Claire*.
3. It has come to my attention that an image of Cindy Crawford taken by me for the December 2013 edition of *Maire Claire Mexico* has been stolen or otherwise unlawfully accessed, deliberately altered and subsequently disseminated online and in print media by numerous individuals and publications. It has been falsely claimed that this photograph represents an unre-touched photograph of Cindy Crawford. This is unequivocally untrue. This is a fraudulent version of my photograph which has been maliciously altered and does not represent the actual legitimate image taken by me.
4. The copyright of this photograph belongs to me and has not been assigned to any other party. I confirm that I have not given my permission for any party to reproduce, alter or disseminate this photograph.

I believe that the facts stated in this statement are true.

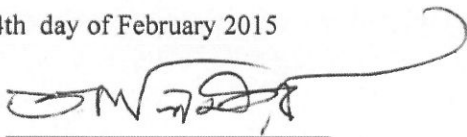
Signed



JOHN RUSSO

Dated the 24th day of February 2015

Witnessed:



TMZ