

19 November 2021

Matilda Duncan
True Crime News Weekly

BY EMAIL

CONFIDENTIAL AND NOT FOR PUBLICATION

Dear Ms Duncan

Yaron Finkelstein

We act for Yaron Finkelstein.

Our client has provided us with the list of questions you have sent to him concerning Natalie Baini. The purpose of this letter is to put you on notice that should you publish any aspect of the allegations that our client acted in any way sexually inappropriately towards Ms Baini, he will immediately issue proceedings for defamation.

Our client categorically denies any allegation that he acted in a sexual manner towards Ms Baini, or indeed that he has acted inappropriately in any way in the presence of Ms Baini. Nothing of the sort has occurred. It simply did not happen.

Putting to one side the fact that the allegations are so vague and lacking in specificity as to lack any credibility, plainly allegations of that nature are highly defamatory. We note that even a publication which only carried an imputation that there are reasonable grounds for investigating allegations of this kind would be unreasonable and indefensible.

Our client is already aware of Ms Baini's allegations. This is not the first time she has sought publicity over them. However, mainstream media have chosen not to publish them.

It is important to note that key aspects of the allegations contained in your questions are demonstrably false and should be a strong indication to you that the allegations concerning our client are also untrue. It should also make you aware that any *Lange* defence would certainly fail on the question of reasonableness.

Most importantly, the fundamental complaint raised by Ms Baini appears to be that she was hampered in her attempts to seek pre-selection for the seat of Reid in 2019. However, Ms Baini never sought preselection. We are instructed that Ms Baini never even took preliminary steps to apply for preselection. In fact, our client is not aware of any person within the party that is aware she had any desire to seek preselection. During the party's formal and public nomination and preselection process, Ms Baini did not nominate. Our client was certainly never aware that Ms Baini had any prior interest in seeking preselection.

Accordingly, the allegation she was a "preselection candidate", as set out in your questions is not true. This appears to be a fundamental aspect of her allegations and yet it is demonstrably false. This alone should indicate to you that the allegations made are inherently unreliable.

Further, there are considerable personal reasons for you to doubt the version of events being provided to you by Ms Baini.

In those circumstances it should be apparent to you that the entirety of the allegations are lacking any merit.

Given the seriousness of the allegations, our client's vehement denials, the lack of any plausible corroborating evidence to support them, and the obvious issues concerning reliability, it would be highly improper and unreasonable for them to be published.

In our view there is simply no basis upon which any responsible media organisation could publish allegations of that nature.

We remind you that our client has had a long and distinguished political and corporate career. He is universally regarded in professional personal circles as a person of the highest integrity. Publication of these false allegations would be highly damaging to that excellent reputation.

He will not hesitate to issue proceedings against you personally and the True Crime News Weekly in order to protect his interests.

Our client otherwise reserves all of his rights.

Yours faithfully
THOMSON GEER



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