From: Claire Gill

Sent: 25 April 2017 17:23

To: Dr. Ruja Ignatova (ruja@onecoin.eu)

Cc: irina@onelife.eu; Frank (frank@sandstone.lu); tfanesaunders@chelgate.com;

Subject: Letters to Jennifer McAdam/BitsOnline [CR-PCR1.FID113720]

Attachments: ONECOIN L to Bitsonline.com DRAFT 21.4.17.DOCX; Letter of Complaint to Jennifer

McAdam 21.04.2017.DOCX

Dear Ruja

I attach draft letters to the publishers of allegations for your approval as we write on your personal behalf as well as that of OneCoin Ltd.

Recognising that published claims are making it very difficult now for the business to operate, it has been agreed with Frank, Terence and Irina that, if the demands in these letters are not met, we initiate legal action.

A claim is being prepared in Norway against Bjorn Bjercke, who seems to be spearheading this particular attack. We propose also to commence legal action against Jennifer (Janet) McAdam either in this jurisdiction or in Scotland where she appears to be based.

As you know there are risks and vulnerabilities concerning proceeding with legal action. There is not a clear path to a "win". However, given the effect on the business, the view is that it is necessary to start legal proceedings so that it is clear we are taking a stand even if it becomes necessary to drop the claims at a later date.

We are focussing on these particular individuals and publishers because they make an allegation about running a criminal network, that is even more serious than the other claims, which ought to make it more difficult to defend.

Before proceedings are actually issued I will send you more detailed advice about risks and costs, including disbursements. In the short term we will need to get Counsel involved in drafting and advising on various aspects of the claim, and to retain a law firm in Scotland if Counsel considers that we should issue proceedings there.

Kind regards

Claire Gill
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