



McCarthy Denning Limited
Minster House
42 Mincing Lane
London, EC3R 7AE

By email

20 September 2021

Your ref: BDJ/CEN0005/1/450498
Our ref: GHC8090/110893/210/4161-0021-6625.1

Dear McCarthy Denning Limited

Robert F Kennedy, Jr.

Thank you for your letter of 11 August 2021 in response to our letter of 28 July.

Whilst our letter was not written as a formal letter before action, it provided all the information necessary for your client to understand our client's complaint, as is clear from your response.

The publications complained of were set out in paragraph 2 of our previous letter, and the meanings ascribed to those publications at paragraph 3. To reiterate, the inference from those publications, which remain on your website, is that our client is a leading proponent of digital hate, including intentionally promoting dangerous false anti-vaccination claims which he knows to be, and which are, demonstrably false in order to enrich himself and profiteer from the pandemic.

In particular, our client vehemently objects to being falsely labelled as an instrument of 'hate'. In his speeches, books and articles, Mr. Kennedy actively promotes peace, democracy, civil discourse, the rule of law and human rights. As he has stated repeatedly, he vaccinated all his children, and he himself received many vaccines as an adult. He does not seek to deprive anyone of the option to take safe, effective medications of any kind, including vaccines. What CCHD broadly refers to as "misinformation," Mr. Kennedy regards as truth, albeit facts and perspectives that generally differ from industry and government promoted narratives.

As you will be aware, serious harm can be inferred from, amongst other things, the gravity of the statements made, and you do not deny that the allegations made expressly and implicitly in the publications complained of are very harmful and damaging to our client's reputation including for the reasons set out in paragraphs 3 and 6(a) of our previous letter.

We also set out in paragraph 6 of our previous letter why the publications complained of were unjustifiable and not in the public interest, and in paragraph 7 why a refusal to publish a right of reply from our client would further undermine any public interest defence.

Lewis Silkin LLP
5 Chancery Lane
Clifford's Inn
London EC4A 1BL

Office details
T +44 (0) 20 7074 8000
F +44 (0) 20 7864 1200
E info@lewissilkin.com
W lewissilkin.com

DX 182 CHANCERY LANE



We note that you indicate you are open to a discussion as to the possible publication of a right of reply by CCDH. To demonstrate CCDH's good faith and the premium it itself places on respectful discourse – the opposite of hate – Mr. Kennedy requests that CCHD publish his [letter](#) of March 30, 2021 to the Facebook Oversight Board (at [RFK-Jr.-letter-to-FB-Oversight-Board-with-Appendix-3.30.21-3.pdf](#) ([childrenshealthdefense.org](#))). The letter, which he sent to the Board following the unprompted de-platforming of his Instagram account, fully sets out his case as to why his digital posts were accurate, well-supported and truthful. If CCDH were to publish this letter on its website (in a manner and with a prominence approved by us on his behalf), that would go a considerable way towards achieving an amicable resolution of our client's complaints.

We look forward to hearing from you with regard to this proposal.

Yours faithfully

Lewis Silkin LLP