



May 10, 2016

Via Electronic Mail

Gillian Duffy
Demelza Hassani
Schillings International LLP
41 Bedford Square
London WC1B 3HX

Re: Panama Papers/Schembri

Dear Ms. Duffy and Ms. Hassani:

On behalf of the Center for Public Integrity and the International Consortium of Investigative Journalists ("ICIJ"), this responds to your letter of May 6, 2016 regarding your client, Keith Schembri.

You have requested that we provide you with documents relating to your client contained in the Mossack Fonseca files that are the subject of the Panama Papers series. We respectfully decline your request.

Contrary to your assertions, the United States Constitution is the relevant body of law in these circumstances. Courts have consistently determined that the First Amendment to the Constitution protects against the disclosure of the type of unpublished documents you seek. See, e.g., *Hutira v. Islamic Republic of Iran*, 211 F. Supp. 2d 115, 120 (D.D.C. 2002). Consistent with these First Amendment protections, ICIJ does not disclose unpublished materials to third parties as a matter of policy.

Please do not hesitate to contact me if you wish to further discuss this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael D. Rothberg", with a stylized flourish at the end.

Michael D. Rothberg

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