

**Oggetto:** Subject: FORMAL REBUTTAL: Case Ref 00577-26 / 00578-26 / 00579-26 – Notice of Ongoing Criminal Tort and Regulatory Failure - Re: Independent Press Standards Organisation - Our reference [IPSO: #00579-26,00577-26,00578-26#]

**Mittente:** [REDACTED] - the recordspeaks.it" <contactus@therecordspeaks.it>

**Data:** 16/02/2026, 17:38

**A:** Max Coulson-Windebank <Max.Coulson-Windebank@ipso.co.uk>

**Subject: FORMAL REBUTTAL: Case Ref 00577-26 / 00578-26 / 00579-26 – Notice of Ongoing Criminal Tort and Regulatory Failure**

**FOR THE URGENT ATTENTION OF THE SENIOR LEGAL COUNSEL / HEAD OF COMPLAINTS**

Dear Mr. Coulson-Windebank,

I acknowledge receipt of your correspondence dated 15 February 2026. Your assessment is rejected in its entirety as factually and legally flawed.

**1. Tolling of Limitation Periods (Technical Reset)** Your invocation of a 4/12-month limitation period is procedurally inapplicable. The violation is not historical; it is **extant and renewed**. On **13 February 2026**, the publishing Authority (ESCC) performed specific technical interventions (defective HTTP 404 implementation) on the primary and 6 mirror pages. This recent action constitutes a fresh publication event and a continuous breach of **Clause 1 (Accuracy)** of the Editors' Code. Regulatory timelines reset upon each intentional modification of defamatory content that results in new indexing anomalies.

**2. Notification of Criminal Proceedings (Jurisdictional Weight)** Be advised that this matter is currently the subject of an **active Criminal Investigation by the Italian Public Prosecutor (Procura della Repubblica)**. The evidentiary corpus includes forensic proof of **documentary forgery** (Royal Mail Certificate WD263867897GB) which renders the underlying narrative of the articles physically impossible. IPSO cannot utilize internal administrative bylaws to immunize member publications from the persistence of verified criminal libel under international judicial scrutiny.

**3. Breach of Duty of Care and Third-Party Harm** The persistence of the "ghost snippets" and corrupted metadata caused by the publications' failure to implement **HTTP 410 (Gone)** status codes is currently inflicting irreparable harm upon **innocent third-party namesakes**, including a distinguished academic. IPSO's refusal to adjudicate on the basis of "time limits" facilitates the ongoing contamination of the digital identity of blameless individuals, exacerbating the liability of your member publications.

**4. Formal Joinder of Evidence** Your correspondence has been formally forwarded to the **Italian Public Prosecutor**. It will serve as evidence of the regulatory failure to remediate an ongoing international tort. IPSO is hereby placed on notice that its refusal to act will be cited in the upcoming Indictment as a factor contributing to the deliberate persistence of the harm.

**5. Final Demand** I require a formal review of this decision by a Senior Officer within 48 hours. I am not requesting "assistance with Google"; I am demanding a ruling on the **Editors' Code breach** regarding the failure to correct a known falsehood and the non-compliance with international data protection

standards (GDPR/TCA).

**6. Reclassification of Status: From Witnesses to Accomplices** In light of your formal refusal to intervene despite the irrefutable evidence of ongoing technical manipulation (13 February 2026), your status in this matter has been reclassified. While IPSO was initially regarded as a potential witness (**persona informata dei fatti**), your current inertia in the face of a verified, ongoing international crime constitutes a facilitative role. IPSO and its officers are now formally considered **complicit in systemic defamation** and the deliberate persistence of an unlawful Harm Flow Chain. This reclassification has been formally noted in the criminal files submitted to the Italian Authorities.

**7. Final Demand** I require a formal review of this decision by a Senior Officer within 48 hours. **Your correspondence has been formally forwarded to the Italian Public Prosecutor.**

The injured party will pursue all statutory remedies, and no further private or informal settlement will be entertained.

Regards,

**Riccardo Gresta**

*Injured Party*

Il 16/02/2026 17:28, Max Coulson-Windebank ha scritto:

**00578-26 theargus.co.uk**

**00577-26 sussexexpress.co.uk**

**00579-26 Daily Star**

Dear Riccardo Gresta,

We are emailing to follow up on your complaint to IPSO.

You have written to the Independent Press Standards Organisation (IPSO), the independent regulator for the newspaper and magazine industry in the UK.

Time limits for complaints

IPSO can only accept complaints made:

- within 4 months of a print article being published
- within 12 months of an online article (which has not been deleted) being published

The articles you complained about were published outside of this time period, and so we will not be able

to assist you on this occasion.

The 'right to be forgotten'

IPSO cannot help with concerns about being able to find articles on Google and other search engines. You may be able to receive assistance from the search engines with this issue.

Data protection law allows you to ask online search engines to delete internet search results containing your personal data (in some cases). This is the right to erasure, also known as the 'right to be forgotten'.

If searching your name through a search engine brings back a result containing information about you, and the information in that link is having a negative effect on your privacy, you can ask the search provider to stop it from appearing in future searches. This would mean that someone searching your name would no longer get results that included the de-listed article, although it would still exist on the publication's website.

If you would like to pursue this option, you can [contact Google directly](#).

More information about how to contact other search engines can be found on the [website of the Information Commissioner's Office](#).

We hope this information is useful.

With best wishes,

**Max Coulson-Windebank**  
**Senior Systems Coordinator**