The Leveson Inquiry

EXHIBIT "CB2" OF THE
WITNESS STATEMENT OF CHERIE BLAIR

---

atkins

Paul Dacre - The Editor
The Daily Mail
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Our Ref:

4 May 2007

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Sir

Cherie Blair

As you are aware, we act for Cherie Blair.

We write in relation to the Richard Littlejohn column at page 17 of your publication of 16 March and, in particular, the section entitled "A get-out-of-jail free Cherie card. Wicked!". The text of that section is set out below:

> *"THE WICKED WITCH has weighed in on the side of those in the Leftwing legal establishment who are determined to keep criminals out of jail.*
>
> *She's backing something called "restorative justice". In essence, this means that anyone guilty of violence, sexual assault, robbery or theft can avoid a prison sentence if they agree to meet their victim and apologise. So that's all right then.*
>
> *Even if you batter an old lady half to death, just so long as you say sorry afterwards you won't have to do any porridge.*
>
> *This dangerous nonsense is gather currency in the "criminal justice" community, despite pilot studies showing it doesn't prevent its beneficiaries reoffending.*
>
> *Hardened criminals will say anything to avoid jail. They don't mean it.*
>
> *That's why prison is the best place for them.*

Have you noticed that this leniency would apply only to those convicted of what most of us would consider very serious crimes?

Don't you think you'll be let off a fine if you say sorry for doing 34mph in a 30mph limit, parking on a yellow line, forgetting to pay your congestion charge or putting the wrong kind of rubbish in the wrong sack. Only yesterday, we learned that even people fined for letting their dogs foul the footpath are going to be forced to provide DNA samples.

You might have thought a passionate "yuman rites" lawyer would be leading the charge against this outrage.

And if the WW is so keen on apologies, when is she going to ask her husband to say sorry for all the crimes he's committed against the British people – including selling honours for cash and taking us to war on the basis of a dodgy dossier cobbled together off the net?

As Yates of the Yard closes in, an apology might be all that keeps Blair out of jail."

This article is a gross distortion of our client's views. The clear meaning given to this article is that our client considers that the most serious dangerous and offensive criminals should not be sent to prison if they simply apologise to their victims. This is harmful and defamatory of anybody in a high-profile position, but particularly so in light of our client's role not only as a Queen's Counsel but also as a Part-Time Judge.

We can only assume that Mr Littlejohn is basing his deliberately inaccurate, distorted and poorly informed article on the talk our client gave as part of Radio 4's Lent Talks season. If this is the case, then we wonder whether Mr Littlejohn actually heard the talk at all or simply found out about its subject-matter and invented the remainder to continue his relentless personal attacks on our client. If he had taken the time to listen, he would have heard our client say *"And it's right and proper that tough sentences are handed down in Court for serious crimes or persistent offenders. Imprisonment shows society's disgust at their actions and help protect the public by keeping criminals off the streets"*. And *"It's not appropriate to hold such meetings where the offender continues denying his guilt. And even where he has admitted his wrongdoing, he may still approach a meeting with his victim with little sense of remorse, wanting to deny responsibility or to claim mitigating circumstances" and "We should consider using such programmes routinely for crimes such as assault, robbery and stealing – in addition, where appropriate, to prison or other sentences"*. In the talk the listener is left in absolutely no doubt that our client's view is restorative justice is part of the judicial process and should be used in addition to existing forms of punishment, including prison. Indeed, our client highlights the fact repeatedly that restorative justice is as much, if not more, about helping victims of crime as it is about aiming to reform the criminal.

As we expect you are aware, our client wrote to you on 19 March setting out her complaint with regards to Mr Littlejohn's article. This was replied to by Robin Esser on 22 March. However, Mr Esser's response is wholly inadequate considering the nature of the attack by Mr Littlejohn. It is disingenuous of Mr Esser to suggest that Mr Littlejohn did no more than say that our client was allying herself with those who advocate restorative justice and that these advocates believe that restorative justice is "alternative approaches to [the] penal sentences" and that "its main aim is to find solutions other than jail". This is certainly not the view of the vast majority of those in favour of restorative justice and whilst we have no doubt you can find an extremist whose views do reflect this, the impression left by Mr Littlejohn's article is that this is not only the view of the majority, but that of our client in particular.

Mr Littlejohn's article is yet another in a long list of rather pathetic and bitter attempts to undermine our client to your very substantial readership, something your organisation plainly condones. It is at best a flagrant and serious breach of Part 1 of the Press Complaints Commission's Code providing as it does both misleading and distorted information in relation to our client's views. We take the view it is also a serious libel of our client and any failure to provide immediate reparation to our

client's reputation as set out below will result in our instructing Counsel to deal with this matter further.

To resolve this matter immediately, we require an immediate and unequivocal Apology published in Mr Littlejohn's section above the fold of the wording set out below:

> *"Cherie Blair – An Apology*
>
> *In my column of 16 March, I indicated that Mrs Blair took the view that criminals, including serious offenders, should not be sent to prison but simply apologise for their crimes to the victims. I accept now that this is a gross distortion of Mrs Blair's views and apologise to her for attributing false views to her. A true indication of Mrs Blair's position in this regard is set out in her letter to this paper on page [ ] of this edition."*

We then require you to publish an un-edited letter from our client setting out her true views, damages, and pay this firm's legal fees for dealing with this matter which are currently £1,275 plus VAT. Finally, we require from you an undertaking not to repeat or make similar defamatory statements about our client in the future.

We look forward to your confirmation agreement to the above as a matter of urgency.

Yours faithfully

Atkins

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Paul Dacre - The Editor
The Daily Mail
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Our Ref:

23 May 2007

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Sir

Cherie Blair

As you are aware, we act for Cherie Blair.

We write in relation to your article on page 10 of the Daily Mail dated Monday, 14 May under the headline "**BBC Splashes £100,000 on Cherie: The Documentary**" by Gordon Rayner.

The article reads as follows:

> *"The BBC is to spend an estimated £100,000 of licence-payers' money on a documentary about Cherie Blair's time in Downing Street.*
>
> *Although normally fiercely protective of her privacy, Mrs Blair has allowed a crew access to No 10 and been followed by cameras on private trips in the UK and abroad for four months.*
>
> *Presenter Fiona Bruce has even trailed the Prime Minister's wife as far as Rwanda for the hour-long retrospective.*
>
> *Such a documentary is normally reserved for outgoing premiers, and critics last night questioned why the BBC felt the need to commission the show...*
>
> *The programme is being made by independent production company Lion Television, which is behind the reality TV show Castaway. During a trip to Africa in February and March, Mrs Blair gave a speech at the Women Parliamentarians International Conference in Rwanda – despite not being a parliamentarian.*
>
> *Then she travelled to Tanzania and Uganda, where she attended the launches of schemes to help support women in business.*
>
> *Insiders say Mrs Blair has lived up to her nickname of "Cherie Antoinette" during filming, with crew members mocking her "regal" behaviour behind her back.*
>
> *One told the Mail: 'At times Mrs Blair was absolutely intolerable.*

> *'During meetings with African presidents and ministers she was treating them as equals, as if she was a Prime Minister herself.'*
>
> *Mrs Blair was greeted like a visiting head of state, with a reception at the British High Commissioner's residence in Tanzania and a meeting with Rwandan president Paul Kagame.*
>
> *The BBC crew only met up with her for two days in Rwanda, when Miss Bruce was reportedly banned from following Mrs Blair into a meeting with the President, much to the presenter's displeasure."*

In the context of the article as a whole, the clear suggestion conveyed to your readership was that during the course of making the TV documentary about her trip to Tanzania and Uganda, our client behaved in such a ludicrously high-handed and deeply offensive manner towards the crew, falsely assuming airs and graces, that she justifiably incurred the hatred and ridicule of the highly professional people with whom she worked, such as the well-known presenter Fiona Bruce.

This is completely untrue, as well as seriously defamatory of our client. By way of example, we attach a letter from Fiona Bruce sent to our client immediately after seeing the article in which Ms Bruce confirms that this suggestion is entirely false.

In the absence of your immediate agreement to:

(a) publish a full and proper apology and retraction (in terms to be agreed with us in advance);
(b) your proposals for damages for libel;
(c) undertake not to repeat these allegations, and
(d) reimburse our client for the legal costs she has been forced to incur as a result.

We anticipate instructions to issue proceedings forthwith without further notice to yourselves.

We look forward to your confirmation that our proposal is accepted in order for us to provide you with the wording to the apology. In the meantime, please give us your immediate assurance that your organisation and Mr Rayner will retain all relevant documents, recordings, notes, memoranda and drafts in relation to this article for the purpose of disclosure in due course.

We look forward to hearing from you as a matter of urgency.

Yours faithfully

[redacted]

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Our Ref: [redacted]

21 December 2007

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Sir

Cherie Blair – Daily Mail, 11 December 2007

We represent Cherie Blair and write in respect of an article written by Richard Kay and published on page 41 of the Daily Mail of 11 December 2007, entitled **"Cherie and the Peace Makers..."**

Amongst the familiar vitriol, the contents of which are in large part denied, it was stated that our client *"has been staying with Blair in his suite at the exclusive Jerusalem hotel, the American Colony...."*. This is untrue.

Of most concern is the fact that the article gives the clear impression that our client had no genuine reason to be in Israel save to stay with Mr Blair whilst he works for the Middle East Quartet, at the latter's expense. This is both false and defamatory of our client.

The true situation was that our client and Mr Blair were not even in Israel at the same time and she stayed at another Jerusalem hotel, not "in his suite" as referred to above. If they were in Jerusalem at the same time then we imagine that the Daily Mail would have a good deal to say if they did not stay at the same hotel.

Prior to publication of this article your journalists spoke to the Portland Trust and could have contacted our client, making it possible to establish the truth regarding the logistics of our client's visit to Israel. It appears, regrettably, that your publication cannot help over-stepping the mark to pour scorn on our client at every opportunity, whether the "story" is true or false.

As a result, we expect your immediate proposals to compensate our client for the damage to her reputation caused by this article; payment of her legal costs in full; an Apology (terms and prominence to be agreed with us in advance); and an Undertaking not to repeat this or any similar defamatory material.

We look forward to your urgent response.

Yours faithfully

[redacted]

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Our Ref.

11 February 2008

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Sir

Tony and Cherie Blair – Daily Mail, 7 February 2008
"One Jag – Queue-jump Blairs get first test drive of new supercar"

We represent Tony and Cherie Blair and write in relation to the above-referenced article.

This is yet another in a very long list of gratuitously insulting, offensive and inaccurate articles which your organisation chooses to publish to undermine our clients.

Our clients did not "queue-jump" at all. The truth of the situation is that our client was speaking at the International Bar Association Conference in November of last year and test drives were offered to those attending. Mrs Blair gave her details and was recently offered such a test drive. It is as simple as that. We are also informed that Hilary Coffman spoke to Jaguar to confirm that this was the situation and that such information was passed on to your newspaper, as well as to the Evening Standard.

More damaging and hurtful to our clients is the incorrect and wholly invented suggestion that "insiders" had told you that car may ultimately be for Euan Blair. Yet again, this is a deliberate and insulting personal attack on our clients and will not be tolerated. The fact that Euan lives in the US is besides the point.

Of course this article contravenes the PCC Code of Practice. We expect an Apology in terms to be agreed with us in advance to be published in your newspaper, for you to remove this article from your databases and libraries, and to pay our client's legal costs in dealing with this matter.

Once we have your agreement to this in principle, we shall send you the appropriate wording.

We look forward to hearing from you as a matter of urgency.

Yours faithfully

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Our Ref:

3 March 2008

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Sir

Cherie Blair
Dail Mail 28 February 2008

We write in respect of an article entitled ***"I'm a Celebrity Skivvy ... Get Me Out of Here: What it's really like working for the stars!"***.

In that article, you have an interview with Nicky Brockhouse who is a personal trainer who claims to have worked with our client, Cherie Blair.

As far as our client is aware, she has never met this man let alone been trained by him. Not only that, we have evidence from the man who worked at Holmes Place and he also confirms that this man never worked there.

Perhaps you could speak to Mr Brockhouse and attempt to ascertain whether or not you consider he is being honest in relation to this article. In the meantime, we should like you to make a note on your databases and libraries and remove this article from the internet.

Once we have the further information from you, we shall discuss the possible remedies available to our client.

We look forward to hearing from you as a matter of urgency.

Yours faithfully

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Our Ref

10 March 2008

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Sir

Cherie Blair
Dail Mail 29 February 2008

We write in relation to a Richard Kay article of 29 February 2008 entitled "***A Cherie-picked takeway***".

Once again you have seen fit to breach the Press Complaints Commission Code of Practice painting an inaccurate and distorted view of the fact that our client occasionally has Italian food delivered by her local restaurant. Of course, this story in itself would not be as interesting to your readership if it was not sensationalised by the first paragraph of this letter which is nothing more than invention.

We should like you to mark on your databases and libraries that there has been a complaint made about this article.

Yours faithfully

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FAO Veronica Wadley
Editor
The Evening Standard
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Our Ref:

18 March 2008

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Sirs

Euan Blair

We represent Euan Blair and write further to your "Londoner's Diary" piece dated Thursday, 13 March 2008 entitled "***Euan the Hawk Fancier***."

This article is full of inaccuracies and is damaging to our client.

Firstly, and most importantly, the article is based on a substantial falsehood ie. that Euan Blair worked in Washington DC as an intern for "Republican politicians rather than Democrats ...". As was clear at the time, and should have been particularly clear to anyone researching the article complained of, our client worked as an intern for both Democrats and Republicans.

We are also offended by the fact that you take quotes from "a friend" rather than attempting to contact our client directly. Furthermore, the "friend" states that because our client has shown support for the Iraq War, it means that he has more in common with the Republicans than the Democrats. We wonder what Hillary Clinton would think of this statement.

We also find offensive the picture of our client next to Governor Arnold Schwarzenegger stating "Republican allegiances: Euan Blair and California Governor Arnie Schwarzenegger."

The bottom line is that this article is a poorly-researched personal attack on our client. It is inaccurate and misleading, and based on a totally false premise. In the circumstances, we expect an immediate Apology (in terms to be agreed) to be published in your newspaper; the article to be removed from databases and libraries; an undertaking not to repeat this allegation; and a contribution to our client's legal costs in the sum of £450 plus VAT.

We look forward to hearing from you as a matter of urgency.

Yours faithfully

Atkins

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FAO Doug Wills
Managing Editor
The Evening Standard
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W8 5TT
By post and fax

Our Ref:

20 March 2008

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Mr Wills

Evening Standard City Diary - 11 March 2008

We act for Cherie Blair and write in relation to a Diary piece last week where you said that our client went to "her favourite restaurant, Maroush, with some acquaintances and special branch heavies and had trouble paying with her credit card." We would like to point out that our client was having lunch with Sue Geddes and two other friends to celebrate Ms Geddes' MBE. There was no Special Branch present. Furthermore, it was our client's second visit to this restaurant and there was a problem with their credit card machine and not with our client's card.

Given the fact that almost all of your article is inaccurate and distorted, we should like your proposal to alleviate the embarrassment to our client and to correct these falsehoods.

We look forward to hearing from you as a matter of urgency.

Yours faithfully

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For the Attention of Peter Wright
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Our Ref

20 June 2008

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Sirs

Cherie Blair

We act for Euan Blair.

Our client is a private individual. He does not hold any public or official office, nor does he court publicity for or discuss details of his private life.

We write in relation to an article which appeared in the Mail on Sunday of 15 June 2008 entitled "Mystery of Euan Blair's £550,000 bachelor flat – Bought two weeks before he starts his first ever job." ("the Article")

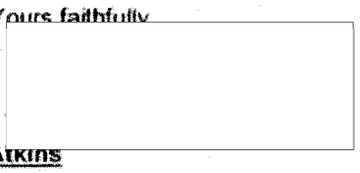
The Article reports a number of details relating to our client's private life, and in particular his (alleged) purchase of a property in Islington, his (alleged) salary and the size of the mortgage which he is obtaining. It is also clear from the Article that you have been monitoring our client's movements ("spotted entering and leaving the flat in fashionable Islington", "Euan was first seen at flat ... last month" etc) and the Article even contains a long-lens photograph of our client and "a friend", captioned as "Euan Blair and friend leaving the £550,000 flat he is buying in Islington."

This information (the truth of which is irrelevant and not a matter upon which we intend to comment) is obviously private and our client is entitled for it to remain so. There is no legitimate interest (as opposed to public curiosity) in publishing such information. We can only assume that the reason why this has been done is because our client is one of the children of the former Prime Minister. As you are well aware, the fact that an individual may be the child of a high-profile individual in no way justifies publication of private or confidential information. This infringement of our client's right to respect for his private life, family and home is entirely unwarranted.

In the circumstances, we require an Apology, an Undertaking not to repeat any of these private details, a sum in the way of damages on which we will take a view depending on the balance of your response, and our client's costs to be paid in full, which are currently £800 + vat. All of our client's rights are expressly reserved, including lodging a complaint to the PCC whose Code you have breached by publishing the Article.

We look forward to hearing from you as a matter of urgency.

Yours faithfully



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Our Ref: DJG/cm

4 July 2008

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Mr Wills

Cherie Blair - Evening Standard - 30 June 2008

As you are aware, we act for Cherie Blair.

We write in relation to the Diary article that appeared in the Evening Standard on 30 June 2008 entitled "***Cherie Lowers the Tone with Garish Artwork***" ("the Article").

The Article makes a number of statements about our client's personal life that are, quite simply, completely incorrect. In particular, our client has not commissioned a wall tapestry of any kind to be displayed her in South Pavilion or anywhere else. Accordingly any related information about the tapestry, including size, subject matter and place of manufacture cannot be and are not true or correct.

In addition, Mr Blair did not last year, or at any other time, escape to the house of Matthew Freud to avoid Martha Greene. The reality of the situation was that building work Mr Blair's new office had not been completed and he had to find alternative work space whilst this was ongoing. Office space at Mr Freud's house served this purpose.

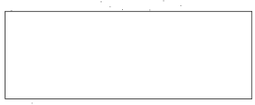
It is quite clear that you can have no defence to publishing such a baseless and false article. It is especially notable that you made no attempt to contact our client or her representatives to seek their response instead choosing to rely upon the supposed "rumours" that you claim are circulating. The prominence of the piece, the headline and complete lack of any viable supporting information within it indicate this piece served no real purpose other than as an attempt to attack or undermine our client.

In light of the unfounded nature of this article our client is understandably annoyed and minded to commence legal action against you and/or complain to the PCC as appropriate. In order to avoid this action, and the expense that comes with it, we require the immediate publication by you of an Apology and clarification in wording to be agreed. This is to be published on the Diary page of your newspaper. Additionally we expect an undertaking not to repeat any of these incorrect claims, your confirmation that a note has been placed in your electronic and hard databases setting out these claims are incorrect and our client's costs to date to be paid in full, these are currently £750 plus VAT.

All of our client's rights are expressly reserved. Please confirm that you will keep all documents, attendance notes, drafts, memoranda and other information relating to this Diary entry pending legal action.

We look forward to hearing from you by return.

Yours faithfully



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Our Ref:

6 October 2008

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Sir

The Blair Family – Infringement of Privacy

We represent the Rt Honourable Tony Blair, his wife Cherie and their family.

It has been brought to our attention that photographers from your organisation were adjacent to their Buckinghamshire home earlier today, taking photographs of the delivery of certain items to their property.

We are informed that the police have been in contact with our client and provided information to suggest that these photographers are from your newspaper. It appears that they are trying to take photographs with long lenses from locations that would not be possible to get to as a member of the public. This is quite unacceptable conduct.

It is quite clear that this is a further invasion of privacy and your photographers should be removed from the vicinity of their home. Mr Blair is no longer the Prime Minister and our clients are entitled to a private life, thus what they choose to do with or at their home is nobody's business.

This behaviour – and any subsequent publication of such pictures – is a clear and blatant breach of the Press Complaints Commission Code of Practice and we are instructed to take the relevant legal action if required.

We look forward to hearing from you as a matter of urgency.

Yours faithfully

Atkins

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By Fax and Post

Our Ref:

28 October 2008

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Sir

Daily Mail - 25 October 2008

We represent Cherie Blair and write in respect of an article written by your journalist, Katie Nicholl, published by your newspaper on 25 October 2008 entitled "***No Credit Crunch for Cherie who Earns £68,000 in a Week***".

This article is either pure fabrication or your journalist has failed to undertake even the most basic research.

The truth of this matter is that our client did not earn £68,000 in a week on a lecture tour of America. She was undertaking her contractual obligations in relation to the publication of her recent autobiography and spoke at four different venues as part of a tour to promote this book. No payment was received for any of these engagements.

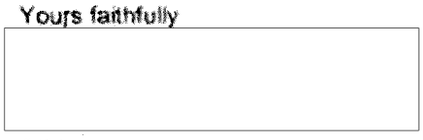
This is an embarrassing error, and yet another in a very long line of unfounded allegations made against our client. As a result, we require an immediate in the following terms:

> "Cherie Blair – Correction
>
> In our article of 25 October 2008 entitled "**No Credit crunch for Cherie who Earns £68,000 in a Week**", we stated that Cherie Blair had made £68,000 in one week speaking on a lecture tour in the United States. We should like to make it clear that there was no truth in this suggestion, and in fact Mrs Blair was not paid for any of these four engagements which were part of her contractual obligations to promote her recent autobiography in the United States."

We should also like you to mark on your databases and libraries that you have had a complaint about this article and an undertaking not to repeat the same. We also expect our client's legal fees in the sum of £575 plus VAT to be covered by your organisation. If this proposal is not agreed, we shall proceed to litigation and/or to the PCC without further delay.

We look forward to hearing from you as a matter of urgency.

Yours faithfully



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Our Ref:

28 September 2009

STRICTLY PRIVATE AND CONFIDENTIAL
NOT FOR PUBLICATION

Dear Sirs

Daily Mail - 5 September 2009

As you are aware, we act for Tony and Cherie Blair.

We write in relation to the article by Neil Sears published in the Daily Mail newspaper on 5 September 2009, entitled ***"The Blairs are caught breaking planning rules (again)."*** The article was also published online at the URL www.dailymail.co.uk/news/article-1211335/The-Blairs-caught-breaking-planning-rules-again.html .

The article says:

> *"He was a lawyer, then Prime Minister. She is a judge. So you might expect Tony and Cherie Blair to abide by the laws of the land.*
>
> *But, after complaints from neighbours, the pair were found to have broken planning rules - and not for the first time.*
>
> *It emerged last night that they were caught using a residential dwelling as a busy office without applying for permission to do so.*
>
> *Their local council investigated when neighbours complained about the disruption they were causing, and could have instigated action that can lead to a criminal prosecution and a £20,000 fine.*
>
> *That shame was averted only when the Blairs admitted what they were up to, and stopped using the house as an office.*

It is only a year since the couple were caught breaking planning laws at their £5.75million listed country home, where they tried to install a gaudy 'Footballers' Wives- style' swimming pool without permission.

The Blairs' latest embarrassment came as they attempted to expand their empire in Central London's Connaught Square, near Hyde Park.

They bought a mansion there for £3.65million in 2004, then three years later bought the mews house behind it for another £1.275million, so they could enlarge their home.
As the Daily Mail revealed this week, the value of the property has recently plummeted by more than £500,000 - but their worries do not end there.

Earlier this year neighbours complained that the Blairs had begun renting another house behind their mansion, for up to £1,000 a week, and that it was clearly being used as an office.
A neighbour said at the time: 'The Blairs went on a bit of a charm offensive after all the upset caused when they moved into the square, when people who have lived there for years found themselves being body-searched by their guards.

The couple used the mansion in Central London's Connaught Square as an office without first obtaining permission

'They had a party at their house for everyone and were all smiles.

'So no one could believe it when they started renting out another house in the mews behind as an office - causing disruption all over again. Now there are people coming and going there all the time.

'We all think it is a bit of a bloody cheek to be using a house as an office when there is no planning permission, given that when he was in office you couldn't move for Labour telling us we couldn't do this and we couldn't do that.'

Neighbours told Westminster City Council, which investigated.

But when the Daily Mail first investigated the issue in March, a spokesman for the Blairs said: 'We are not aware of any breach of the planning use regulations and have received no letter from the council.

'If there is a cause for complaint, we have every confidence that it would be satisfactorily resolved.'

Their landlord, Andrew James of Barnes, South-West London, similarly claimed no rules had been broken. But the council confirmed that the Blairs had eventually admitted breaking planning rules.

A spokesman said: 'After the investigation we issued the technical planning letter called a Planning Contravention Notice.

'When we sent that they admitted, "It's true we were using it as an office", but they stopped. One of our officers went and checked.

'The investigation was closed in late April because they had stopped using it as an office.'

Last night a spokesman for the Blairs declined to comment".

This article is defamatory of our clients, damaging their reputation both personally and professionally. The article gives the clear meaning that our clients broke planning rules and then attempted to deny that they had done so. This is clearly very damaging for our clients, particularly with respect to their professional reputations.

The article is wholly inaccurate. Our clients were never in breach of planning rules and were not found to be in breach by the City of Westminster Planning Services. The truth of the matter is that whilst a third party did raise the question as to whether a change of use had taken place it was decided that this had not occurred at the property. We attach a letter confirming the same. This is clearly very different to your stating that our clients either admitted to using the house as an office or that they stopped as a result of an investigation by Westminster City Council.

Furthermore, the last line of the article is inaccurate. The legal firm acting for our client in property matters, Learmond Criqui Sokel, wrote to Mr Sears and set out the true position to him in a letter of 4 September, sent by email. We attach a copy of that letter in which you will see the letter from Westminster City Council is quoted. It is, therefore, unquestionable that you proceeded with the defamatory publication in spite of knowing the correct position.

In addition the reference you make to our clients previously having breached planning regulations at their country home in respect of a pool is also entirely false and inaccurate. Our clients were not, at any time, found to be in breach of any such regulations.

Our clients are understandably aggrieved and upset by these entirely untrue and libellous allegations. As a result, our client requires the following as a matter of urgency:

1. An Apology to be printed in your newspaper and online in as prominent a position as the original article on a right hand page above the fold in the following terms:

28 September 2009
Paul Dacre
Editor
The Daily Mail

"TONY AND CHERIE BLAIR – AN APOLOGY

In our article of 5 September 2009 entitled **"The Blairs are caught breaking planning rules (again)"**, we stated that Tony and Cherie Blair had been using a residential property as a business office without appropriate permission and had been stopped from doing so by Westminster City Council. We should like to make it clear that this was, in fact, not the case and at no time were Mr and Mrs Blair in breach of any planning permission."

2. An undertaking not to repeat this or any other related defamatory material about our client, including the claims relating to breach of planning permissions regarding a swimming pool at their country home;

3. Your proposals in relation to damages for the harm done to our clients as a result of your libellous article; and

4. Your agreement to pay our clients legal costs in this matter.

Please ensure that all documents concerning the preparation of this article and how it came to be published are retained pending disclosure. This should include full details of any requests and discussion Mr Sears had with Westminster City Council whilst pursuing his story.

In light of the continuing damage being suffered by our clients, we expect to hear from you as a matter of urgency, and in any event no later than close of business on Friday 2 October 2009.

Yours faithfully

Cc. Nick Braithwaite – Legal

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Our Ref
Your Ref:

6 October 2009

Strictly Private and Confidential
Not for Publication

Dear Sir

Cherie Blair – Mail on Sunday 4 October 2009

We act for Cherie Blair.

We write in relation to an article published by your newspaper on 4 October 2009 headlined "***Cherie demands armed police protection... and it will cost taxpayer £500,000***" by Christopher Leake and Alex Marunchak.

We set out the article (which appeared in both the hard copy and online version of the newspaper) in full:

> ***"Cherie demands armed police protection... and it will cost taxpayer £500,000***
>
> *Scotland Yard has abandoned plans to scale down security around Tony Blair after his wife Cherie complained to the Home Office.*
>
> *Metropolitan Police chiefs had drawn up detailed plans to reduce the size of the team guarding the Blairs' London home.*
>
> *Senior officers said the £500,000 bill for an armed police guard was an unnecessary burden on the taxpayer because the couple were often away from their £4.36million West London mansion.*

But it is understood they were forced to drop the plans after Mrs Blair personally contacted senior Home Office officials.

As a result, the Home Office's little-known Royal and VIP Executive Committee (Ravec) - which decides who should be protected at public expense - agreed not to change the existing arrangement.

In the past, security experts have expressed concerns over the Blairs' home because of its close proximity to the West End, one of Europe's busiest commercial areas.

The cost of guarding Mr Blair - who is being tipped to become the first president of the EU - has soared since he quit as Prime Minister in June 2007.

In addition to an armed guard, Mr Blair - who has earned at least £10million since leaving office - also has a police protection detail in the UK.

Security is provided by the US when he is on lucrative lecture tours there and further protection is provided by various agencies in his role as Middle East envoy.

Last night, sources close to Alan Johnson insisted the Home Secretary was not aware of the dispute over the Blairs' security.

But one source said: 'Mrs Blair complained personally and the earlier decision was reversed by Ravec.'

Security sources pointed out that former Prime Minister Baroness Thatcher had seen her security reduced in recent years.

Last night, Scotland Yard and the Home Office said they never discussed the security of the VIPs they protected.

A spokesman for Mrs Blair said: 'Cherie Blair has never made a request of this kind to the Diplomatic Protection Group. All decisions on security are taken by the police and no one else."

The caption to one photograph on the online version of the article stated "Costly: Armed protection for Cherie Blair costs the taxpayer £500,000." The caption to the second photograph stated "Protection: An officer guarding the London home of Cherie Blair." These captions are harmful and biased, and add to the false impression given by the Article.

The Article is highly defamatory of our client, suggesting as it does, in clear terms, that she made wholly unreasonable demands for police protection, despite the fact that it would cost the taxpayer £500,000, and had thereby acted in a shamelessly greedy and self-important manner. This allegation is wholly untrue. Our client made no such demand at all.

As you may expect, our client is extremely distressed and upset by your article. The fact that you published this despite having been expressly informed in advance by her representatives that the allegation was untrue only serves to add insult to injury. Indeed, the fact that you chose to include a very brief statement from "a spokesman for Mrs Blair" (albeit entirely out of context) at the very end of the article did nothing to remove the defamatory message firmly planted in the mind of the reader by the rest of the text, as well as the highly provocative headline. Instead, it further aggravated the situation by suggesting that her denial was implausible and/or should not be believed. This is also libellous.

You will have seen the abusive messages posted on your website as a result of this deliberately false article. You have no qualms about publishing this malicious rubbish, nor do you appear to consider the security problems this may cause for the Blair family.

In the circumstances, our client is simply not prepared to allow this article to remain unchallenged, especially given the trouble taken to advise you of the correct position prior to publication. She therefore requires, and is entitled to (as ourselves and Counsel have advised her) the following:

(1) Your agreement to join in a Statement in Open Court, which will go some way to publicly vindicating our client's reputation;

(2) An Apology and a report of the Statement in Open Court on the day following the latter, the terms and prominence of which should be agreed with us in advance;

(3) Immediate removal of the online version of the article and its removal from your databases;

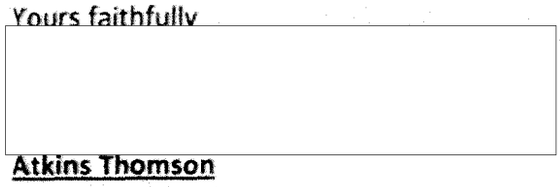
(4) Your undertaking that the Mail on Sunday will not republish or repeat the publication of the same or any similar words defamatory of our client;

(5) Your proposals for substantial compensation to our client for the serious damage caused to her reputation, as well as the distress she has suffered as a result of the article; and

(6) Your agreement to pay our client's legal costs in this matter.

We look forward to your satisfactory response within 7 days, failing which we are instructed to issue proceedings against you without further notice. We believe this time-frame is entirely justified given your deliberate decision to ignore the straightforward denial given to you on our client's behalf.

Yours faithfully



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By Fax and Post

Our Ref:

10 December 2009

Strictly Private & Confidential
Not for Publication

Dear Sir

Cherie Blair – Daily Mail 30 November 2009

We act for Cherie Blair.

We write in relation to an article which appeared in the issue of the Daily Mail on 30 November 2009 under the headline "Cherie disowned by 'miracle man' of US Catholics over her criticism of Church", ("the Article"), as well as on the newspaper's website on the internet at URL www.dailymail.co.uk.

We set out the Article in full:

"Cherie disowned by 'miracle man' of US Catholics over her criticism of Church

Cherie Blair has received a humiliating snub from a leading Roman Catholic in the US.

Jack Sullivan – the man the Church of Rome believes was healed after praying to Cardinal John Henry Newman – dropped in on Mrs Blair during a visit to England last month.

But he is now trying to erase references to their meeting because he says he was 'shocked and horrified' to discover that Mrs Blair – although a Catholic – opposes the Vatican's teachings on sexual morality and had publicly supported pro-choice groups in the debate over abortion.

Mr Sullivan, whose sudden recovery from a severe back condition has put Victorian convert Cardinal Newman just one step away from sainthood, said he was unaware of her opinions when driven to the Blairs' £5.75 million Grade 1-listed country pile near Aylesbury, Buckinghamshire.

The 71-year-old Catholic deacon from Marshfield, Massachusetts, claims he would not have agreed to meet her if he had known of them in advance.

He has publicly repudiated his written reflections of his visit in which he spoke of how he and his wife Carol were 'most impressed with our meeting with Cherie Blair'.

He has also asked at least two newspapers and a range of other media outlets to delete references to the meeting.

He says he is anxious that Mrs Blair does not hijack the figure of Cardinal Newman to promote her own brand of what he sees as pick-and-mix Catholicism.

Mr Sullivan's latest views were posted on the website of the Cause for the Canonisation of John Henry Newman, which is run by the Birmingham Oratory, the church founded by the cardinal in the 19th century.

'Unfortunately, Jack had not been made aware of Mrs Blair's public opposition to the teaching of the Church' said a spokesman. 'He undertook the visit in good faith, believing Mrs Blair to be simply a prominent Catholic.

'As soon as he was made aware of Mrs Blair's record of public dissent from the Church's teaching, Jack requested that all reference to meeting her be removed from the published recollections of his visit.'

The spokesman added: 'The conjunction of Mrs Blair's "conscientious" dissent from the teaching of the Church with Jack Sullivan's apparent endorsement of her could do harm to Newman's reputation.

'Newman is indeed the great teacher of the rights and duties of conscience.

'It is of the greatest importance that his teaching is not used to make him the patron of Catholics, like Cherie Blair and others, who in the name of conscience practice dissent from the Church's teaching.'

Mr Sullivan was healed of a crippling spinal condition that had left him on the verge of paralysis after he prayed to Cardinal Newman for help in August 2001.

In July, Pope Benedict declared the healing as the miracle needed to declare Cardinal Newman 'Blessed'.

A second miracle will be needed to make Newman a saint. Mr Sullivan was invited to Britain, ahead of Newman's beatification by the Pope in Britain next September, by Vincent Nicholls, the Archbishop of Westminster, to tour sites associated with Newman's life.

Mrs Blair has a track record of promoting pro-choice causes.

In 2003 she hosted a private reception at No 10 for the International Planned Parenthood Federation, and two years later celebrated the 75th anniversary of the Family Planning Association."

The Article was accompanied by a photograph of Mr Sullivan, alongside the caption "***Snubbed: Mrs Blair was criticised by Jack Sullivan, who was 'cured' after prayer***".

The clear impression given to your readers was that our client had been snubbed by leading US Roman Catholic figure, Jack Sullivan, because she misled him by failing to disclose at their recent meeting that she had publicly advocated abortion and that as a result, Mr Sullivan had even sought to retract his public statements recording his meeting with her in an attempt to disassociate himself from her attempts to hijack his connection with Cardinal Newman for her own self-promotional ends.

We should not need to point out that these allegations (particularly for a practising Roman Catholic) are highly defamatory, as well as upsetting and offensive. They are also wholly untrue, as your newspaper would have readily discovered if you had contacted our client prior to publication in order to verify the suggestion, as could easily have been done. In fact, Mr

Sullivan has not sought to retract any public reference to his meeting with our client, nor has he snubbed her. Indeed, he has communicated to our client his considerable concern about the contents of the Article and the untrue statements it contains.

As you may expect, our client is extremely distressed and embarrassed by the Article. We simply do not understand why you failed to contact her before publishing these allegations in accordance with the most basic tenets of responsible journalism.

In the circumstances, our client is simply not prepared to allow this Article, and the false and seriously defamatory allegations which it contains, to remain unchallenged and uncontroverted. She therefore requires, and is entitled to (as ourselves and Counsel have advised her), the following by ay of redress:

1. Your agreement to join in a Statement in Open Court, which will go some way towards publicly vindicating our client's reputation;

2. An Apology or a report of the Statement in Open Court (on the day following its reading), the terms and the prominence of which need to be agreed with us in advance;

3. An undertaking not to repeat the allegations or similar allegations to that effect;

4. An undertaking that you will take all necessary steps to procure the removal of any online version of the Article and the removal of it from your databases;

5. Your proposals to compensate our client for the damage that has been done to her reputation, as well as the distress she has suffered as a result; and

6. Payment of our client's legal costs.

We look forward to a prompt response from you, failing which we are instructed to issue proceedings against you without further notice. In the meantime, all our client's rights are reserved.

Yours faithfully

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Our Ref:

11 March 2010

Strictly Private & Confidential
Not for Publication

Dear Sir

Tony and Cherie Blair – Daily Mail - 6 March 2010

As you are aware, we act for Tony and Cherie Blair.

We have been instructed in respect of an article entitled ***"Fault! Will Blair have to tear down his illegal tennis fence?"***, which was published in your newspaper on 6 March 2010 and was also made available online on that date with the headline ***"Blair courts trouble: will it be game, set and match to planners over his illegal fence?"*** at the url: http://www.dailymail.co.uk/news/article-1255834/Blair-courts-trouble-Will-game-set-match-planners-illegal-fence.html.

Both versions of the article featured aerial photographs of the tennis court at our client's property in Wotton Underwood. We make specific reference to the attached photograph that shows the location of the tennis court in our client's grounds. This photograph was taken from some distance outside the property. The photograph shows clearly the precise layout of the South Pavilion grounds in relation to nearby roads and surrounding buildings. These images are far more detailed than any available on Google Earth or similar.

The photograph of the entire grounds is credited as to "Noble/Draper". We are aware that Noble Draper Pictures Limited acts as freelance paparazzi, working to specific orders and almost exclusively for your newspaper. It is plain that this photograph was deliberately taken and commissioned by you to illustrate this story, resulting in either or both of Mr Noble and Mr Draper in a light aircraft and flying over or near our clients' property to take these photographs. We presume that a high-powered digital camera was used and numerous photographs of the property were taken. These photographs would then have been sent and/or disclosed and/or caused to be disclosed to your newspaper who in turn published two of the photographs online and in hard copy on 6 March.

As you are well aware, our clients are very careful in protecting their privacy and their security, which is especially important considering Tony Blair's position as the former Prime Minister and the UN Special Envoy to the Middle East. These roles clearly make Mr Blair an individual that many people have extreme views about, including very negative ones. You are, of course, aware that as a former Prime Minister, Mr Blair receives police protection. Plainly a photograph of the sort published by you is a risk to his and his family's security because it both identifies the exact location of their home and provides a clear indication as to how any person wishing to obtain unauthorised access to their property could potentially do so. Our clients have been informed, on a confidential basis, by both police and security specialists that your photograph has created a potential threat to their security at the South Pavilion property. This will be no surprise to you.

The taking and publication of this photograph is not only reckless and potentially dangerous, but is a serious and gross misuse of private information about our clients. Under Article 8 of the European Convention on Human Rights our clients are entitled to respect for their private and family life, home and correspondence. Both *Campbell v MGN Ltd* and *McKennitt v Ash* have made it clear that individuals have a reasonable expectation of privacy in respect of matters that fall under Article 8. This expressly extends to one's home, particularly when security issues are at stake (*Beckham v MGN (2001) EWHC (QB)*).

There can be no doubt that the taking of the photograph by Noble Draper Pictures Limited and your use of it is a gross invasion of our clients' right to privacy. There is no public interest in publishing the photograph. In the circumstances, our clients seek the following:

A. Within 24 hours:

1. The removal of the image complained of from your website; and

2. Your agreement not to further publish and/or syndicate and/or disclose the offending images; and

3. Make an appropriate note on your databases and libraries.

B. Within 14 days:

4. Your proposals for damages for our clients and/or an account of profit;

5. Your agreement to disclose to us the fee paid and/or agreed to be paid by the Daily Mail newspaper and/or Mail Online in respect of the photograph(s) and the activities described in this letter, together with all documents/email/texts SMS messages concerning:

   a. The commissioning by and or instructions from the Mail for the taking of the photographs; and

   b. The transmission and/or dissemination and/or syndication of the photographs and the photographer's camera to your office and/or direct to the Mail newspaper; and

   c. The payment in respect of such commission and/or agreement with the Mail (whether paid or not);

6. Delivery up to us of all images and digital and other copies of the photographs taken of our clients' property (including all EXIF data embedded in the same); and

7. Your agreement to pay the legal costs our clients have been forced to incur in relation to this matter.

We await hearing from you by the time limits specified.

In the event we do not receive satisfactory proposals, we anticipate that proceedings will be issued shortly thereafter. All our clients' rights are reserved.

Yours faithfully

Cc: Adam Cannon – Legal Department

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Our Ref:

14 September 2010

Strictly Private & Confidential
Not for Publication

Dear Sirs

Cherie Blair – Daily Mail - 6 September 2010

We write in relation to the article in the Peter McKay column in your newspaper of 6 September. The section itself is untitled but is accompanied by a large photograph of Carole Caplin. For certainty, we attach a copy of the relevant page, with the article outlined in red.

In that article Mr McKay states that Carole Caplin "used to share the shower with the then-chatelaine of number 10". This assertion is entirely incorrect and libellous. Our client has never shared a shower with Ms Caplin.

We have previously brought this issue to the attention of a number of newspapers and corrections and/or Apologies have been published. Plainly this is a statement that is very damaging to our client's reputation as a highly-regarded QC and part-time Judge, let alone the mother of 4 children. An Apology is plainly necessary to avoid further repetition of the sort carried out by Mr McKay and to prevent our client from ongoing false claims in this regard.

Therefore, please publish an immediate and unequivocal Apology in the terms set out below:

"Cherie Blair – An Apology

In an article published in Peter McKay's column on 6 September we stated that Carole Caplin shared showers with Cherie Blair. We now understand that this never happened. We apologise for stating otherwise.

Our client is willing to forego damages if this correction is published immediately and you agree to pay our legal fees, which are currently £500 plus VAT.

We look forward to your confirmation that this above is agreed.

Encs: As above

Picture: DAVE BENETT

NOW we've had the memoirs of Tony and Cherie Blair, when can we expect to read about the services provided to both by the exotic Carole Caplin, 48, who used to share the shower with the then-chatelaine of No 10 and whose spiv boyfriend, Peter Foster, helped the family to buy £500,000 worth of investment property in Bristol? Although Ms Caplin (above) milked her proximity to the Blairs for all (and more) than it was worth — becoming for a time the nation's best-known 'lifestyle coach' — she didn't get on down, as they say in rock circles, and write about life chez Tony and Cherie. Considering he has now spilled his guts in print — especially about Gordon Brown — surely Blair wouldn't enforce a confidentiality agreement signed by Ms Caplin. Perhaps she could promise some of her literary tell-all earnings to the British Legion.

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Our Ref:

20 September 2010

Strictly Private & Confidential
Not for Publication

Dear Sir

Tony Blair – A Journey
Copyright Infringement

We represent Cherie Blair.

We write in relation to an article by Richard Kay published on pages 10-11 of the Daily Mail on 2 September 2010 headed **"Did he really warn Diana about Dodi or is it just fantasy by a royal pretender?"**.

The article was illustrated by a photograph of Kathryn Blair and Princess Diana at Chequers. It was captioned *"This picture of Tony Blair's daughter Kathryn with Diana is from his private collection and published in his book, A Journey"*. The photograph was taken directly from Tony Blair's memoir "A Journey" ("the book"). That photograph can be found on the 4th page of the second section of photographs in the current edition of that book.

This photograph was, in fact, taken by our client, Cherie Blair. Our client agreed to it being used in her husband's book. This was the sole agreed purpose for the photograph and neither the publisher of the book (Hutchinson) nor anyone else involved in the book given permission to use the photograph for publicity purposes or pass them to any third parties. Nobody else has ever been permitted to publish the photograph. Similarly no permission was given to licence or otherwise permit any third party to use or publish the photograph.

20 September 2010
The Editor
The Daily Mail

The photograph is an original artistic work, it being a photograph as defined in section 4 (2) of the Copyright, Design and Patents Act 1988. As stated, it was taken by Cherie Blair in 1997, accordingly Cherie Blair is the author of the photograph and as it was not taken in the course of employment she is also the first owner of copyright. Cherie Blair has not assigned or otherwise disposed of her right in the photograph. The duration of the copyright has not yet expired. Accordingly, the ownership of the copyright in the photograph remains with Cherie Blair.

By copying and issuing to the public copies of the photograph you have breached our client's copyright. This is done despite it being clear from the book, and recognised by you, that it was a copyright-protected picture. On any definition, you have used a substantial part of the photograph.

In light of the above our client is entitled to damages from you. Indeed, the infringement is so flagrant in its use that we seek additional damages in accordance with section 97 (2) (a) of the Copyright, Designs and Patents Act 1988.

In relation to this photograph, we therefore require immediately from you:

1. Your agreement to pay Cherie Blair £1,500 in damages;
2. Your undertaking not to use or publish in any form the photograph in the future;
3. Delivery up of any hard copies of the photograph you may have, together with your confirmation that all electronic copies have been deleted or removed and destroyed from all your libraries and records;
4. To mark your databases and libraries accordingly; and
5. Your agreement to pay our clients' legal fees in relation to this matter. These fees are currently £600 plus VAT.

We look forward to your response as a matter of urgency.

Yours faithfully

[redacted]

Atkins Thomson

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For the attention of John Wellington, Managing Editor
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Our Ref:

22 September 2010

Strictly Private and Confidential
Not for Publication

Dear Sir

Leo Blair – Mail on Sunday – 19 September 2010

We are instructed by Cherie Blair.

We write in relation to an article published by your newspaper under the headline "My shame and humiliation", which appeared at pages 12 and 13 of the 19 September edition of your newspaper. That article included a photograph showing our client in Westminster Cathedral with her husband and three of their children, Nicholas, Euan and Leo. We make particular reference to that photograph.

Our client is aware that she will, on occasion, be in the public eye and on those occasions there may be genuine reasons for an accurate and fair article to be published. Accordingly, she recognises that her public standing means that there is a risk that photographs of her and her husband appearing at public events may be published. Provided these photographs do not intrude upon our client's rights to privacy as permitted under the current law, she will not take issue with them.

However, as you will be aware, both Tony Blair and our client have always sought to keep their children out of the public eye as much as possible, particularly before they reach the age of 18. To that regard, we are making specific reference to Leo who remains a minor. We recognise that you have not identified Leo Blair in the caption to the photograph but you have made reference to him in the text of the Article, where you state *"The Pope's Westminster Cathedral sermon was delivered to a congregation that included the former Prime Minister Tony Blair, his wife Cherie who wore the traditional black mantilla or headscarf, and their*

children, Euan, Nicholas, Leo and Kathryn". This wording makes Leo Blair clearly identifiable in the photograph.

In consideration of his age and the careful control his family has taken to keep him out of the media spotlight, Leo would have had a reasonable expectation of privacy despite being on public property. Accordingly, your publishing photographs of him is, following *Von Hanover –v- Germany* as applied by Lord Justice Buxton in the Court of Appeal decision of *McKennit –v- Ash (2006)* a clear intrusion into his private life.

We also remind you of the Press Complaints Commission Code of Practice and, in particular, paragraphs 3 (ii) and 6 (v).

We are of the view the sole reason for Leo appearing in this photograph is because of his parents' fame. This was not necessary, and the photograph could easily have been altered so that Leo was not in it. We note this was done to a similar photograph for the internet version of the article.

We put you on notice that if you do wish to publish photographs that include Leo Blair, our client's consent should be expressly sought but, except in extremely unusual circumstances, it will not be given.

In order to resolve and mitigate this matter without our client having to take any further action against you, we require your written assurance by return that:

1. You will not further publish, or cause to publish, distribute or otherwise disseminate these photographs and will delete all hard and electronic copies of them from all relevant databases and libraries. This includes the immediate removal of the photographs from any online copies of the paper version of the newspaper, such as pressdisplay.com;

2. You will not publish or cause to be published any further photographs of Leo Blair, save with our clients' specific consent; and

3. You will pay in full the legal fees incurred by our clients for dealing with this matter. These are currently £650 excluding VAT.

We look forward to hearing from you as a matter of urgency.

Yours faithfully

Atkins Thomson

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Our Ref:

12 July 2011

Strictly Private & Confidential
Not for Publication

Dear Sirs

Cherie Blair – Daily Mail – 28 June 2011

We are instructed by Cherie Blair in relation to the article headlined "How the Blairs have become ships that pass in the night" by Paul Scott, published on page 29 of the 28 June edition of your newspaper and also online.

The article discusses the state of our client's marriage to Tony Blair. It states that our client's marriage to Tony Blair is in trouble. This claim was supported by a number of details, presented as fact, including that our client will not be taking a family holiday with Mr Blair and that in a recent trip to Italy she arranged, and had, an audience with the Pope.

Regardless of our client and/or her husband being public figures she is plainly entitled to respect for her private life under Article 8 of the European Convention on Human Rights. As you are well aware, the English Court has time and again reinforced the level of protection which is afforded to the private lives of individuals.

As our client made you aware in her letter of 28 June, the aspects of the article described above are wholly untrue. The marriage is not in difficulty. As you have acknowledged in your letter of 1 July, our clients booked a three week summer holiday together in February, many months before the article was published, and will be going on it. In addition, there was no audience with the Pope during our client's recent trip to Italy, and there never was any plan for one to take place.

As stated in the case of *McKennitt v Ash*, protection applies regardless of whether the information published is true or false. We therefore should not need to point out that the publication of these (incorrect but presented as true) 'facts' constitute an unlawful invasion of our client's right to privacy. It is notable that the article was written by Paul Scott, who has a history of claiming incorrect or misleading statements about our client and her husband are fact. Your article is also a breach of confidence and of the statutory duty imposed upon you under the Data Protection Act 1998.

Further, the article plainly breaches of paragraph 1 (i) – (iii) of the Press Complaints Commission Code of Practice, which states:

"(i) The Press must take care not to publish inaccurate, misleading or distorted information, including pictures.

(ii) A significant inaccuracy, misleading statement or distortion once recognised must be corrected, promptly and with due prominence, and – where appropriate – an apology published.

(iii) The Press, whilst free to be partisan, must distinguish clearly between comment, conjecture and fact."

There is absolutely no public interest in the article, nor any justification for disclosing this private information. We remind you of the vital distinction between what might be of interest to members of the public and what they are entitled to have a legitimate interest in knowing about. This is a distinction that the Court has repeatedly stated the press is apt to confuse.

Our client is upset by the publication of the article and its invasion into her private life. The false statements have caused her awkwardness and embarrassment.

We are aware that you have been in contact with our client in relation to this article and removed the article from your website but have taken no further action to correct its content. You have not even offered or published a correction in your newspaper, despite this being requested by our client in her initial letter to you. This is entirely unacceptable. In the circumstances, we require your immediate agreement to the following requests:

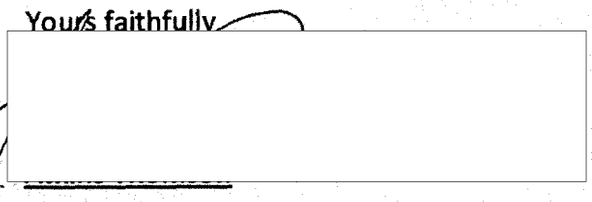
1. the publication of an apology in terms to be agreed, to be published in a position of equal prominence (also to be agreed in advance with ourselves);

2. Your proposal for compensation for the invasion of our client's privacy and the embarrassment it has caused.

3. The reimbursement of our client's legal costs, which she has been forced to incur as a result of your failing to properly deal with and correct the article.

We await your prompt response.

Yours faithfully



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STRICTLY PRIVATE & CONFIDENTIAL
Paul Dacre
Daily Mail
Northcliffe House
Derry Street
London
W1

Our Ref:
Your Ref:

24 November 2011

NOT FOR PUBLCIATION

Dear Sirs

21.11.2011 - Daily Mail Saif Gaddafi claim

We write on behalf of our client, Cherie Blair, and an article published by your newspaper on 21 November 2011.

The article, headlined ***"Will Saif give us the truth about Blair, Mandy and friends?"*** was written by Melissa Kite and published on the MailOnline at the URL: http://www.dailymail.co.uk/debate/article-2064232/Saif-Gaddafi-capture-Will-truth-Blair-Mandelson.html.

The article states:

"One minute you're living in Hampstead, and hanging out with top toffs at shooting parties in the country, the next minute you're facing a firing squad in Libya.

Such is the strange trajectory of Saif Al-Islam Gaddafi.

It does seem extraordinary that a few years ago we were being told there was nothing wrong with Colonel Gaddafi's playboy son and it was entirely natural that the great and the good should hang out with him and now he's an international hate figure being lined up for death.

It seems to me he can only be one of those things, not both.

And now that the world has turned on him, and he is behind bars, what is he going to say about those leading members of our society – Tony Blair, Peter Mandelson, Prince Andrew, Nat Rothschild, to name a few – who treated him for years like he was the best thing since sliced bread.

What might he say about Blair or Mandelson's role in the release of the Lockerbie bomber?

What might he say about his dealings with that strange triumvirate, Mandelson, Rothshild and Oleg Deripaska.

Mandelson (and Cherie Blair, if you please) attended a shooting party with Saif at the Rothschilds' Buckinghamshire mansion in 2009.

Both Saif and Mandelson are friends of Deripaska, whose villa and yacht they both stayed on in 2008.

What were they all up to in this cosy little power-friendship they pursued for years?

Mandelson, who has just bought an £8million London house, must be wondering what on earth Saif is about to say as he stares his mortality"

In the article it is stated that our client attended a shooting party with Saif Gaddafi and, in including this information as part of the article, suggests our client is or was close friends with him, or they had some form of commercial or mutually beneficial association. This, as you already know, is wholly untrue and defamatory of Mrs Blair.

On 26 November 2009, your newspaper claimed that our client attended a shooting party with Saif Gaddafi. Our client issued a claim against you for this at the High Court. On 22 November 2010 you published an apology accepting she was not there. We attach a copy of that apology. You also agreed to pay our client damages and legal costs. The truth of the matter is that our client has never met Saif Gaddafi and is certainly not a friend or associate of his.

It is staggering that despite your publication's own apology, which should be included in your archive and database, you have chosen to repeat the defamatory words complained of. You have published this article despite knowing it is both untrue and defamatory.

In order to rectify the damage down by your publication we require from you the immediate removal of the relevant part of the online article.

We also require your immediate agreement to the following requests:

1. the publication of an apology in terms to be agreed, to be published on the front page of the MailOnline for 7 days and permanently placed in archive..

2. Your proposal for compensation for the further and repeated defamation of our client and the embarrassment it has caused.

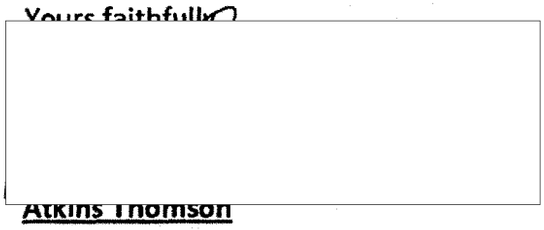
3. Provide an undertaking not to repeat in the future the claim that our client attended a shooting party with Saif Gaddafi.

4. Make a note on your databases and libraries that our client did not attend this shooting party.

5. The reimbursement of our client's legal costs, which are currently £750 plus VAT

We look forward to your urgent response.

Yours faithfully



Atkins Thomson

fund for patients another le lottery'

UG SAVED MY LIFE'

ER nurse Jill de Cruz es her life was saved istin, one of the can- ugs not approved in n parts of England. bruary 2009 the 48- ld was diagnosed with cancer. She was told spread to her neck, id lungs and she had a of months to live. our children, aged en 16 and 23, and her id Mark, a prison were devastated. extensive surgery, d moved into a hos- nen doctor sug- she a chemother- l Avastin, which halts essel growth and can umours. it the life-extending which costs up to £20,000 per course, through private health insurance taken out months before her diagnosis. Today, she is full of vitality, walking her dogs and spending time with her two grandchildren.

Her condition is still considered terminal but it has stabilised and she could remain well for many years.

Mrs de Cruz, of Bracknell, Berkshire, said last night: 'It's very upsetting that the wool has been pulled over our eyes again with the interim drugs fund.

'I was told I probably had only weeks left... but I truly believe I am here today because of Avastin. If people can get plastic surgery on the NHS, why shouldn't they get this drug?'

Transformed: Jill de Cruz today

England's ten Strategic uthorities do automati- prove funding for bowel fferers to have Avastin, a which typically gives them ix weeks of life.

it least two regions – the est and London – bowel tients have been told not applying for it.

est SHA now says Avastin bowel cancer patients pecialist can 'demonstrate expect the cancer drug to reater clinical benefit to could be expected to oth- our condition'.

SHA has a 'red' list which Avastin for bowel cancer. working in the area cov- ie North West SHA, who to be named, said: 'It's rating and another post-code lottery for patients.' In all, fewer than 200 patients are so far known to have been approved for treatment since the fund started on October 1, raising fears it could be underspent by March.

Millions could be sent back to the Department of Health's coffers despite campaigners estimating at least 2,400 cancer patients should be helped by then, far beyond the current take-up rate.

Andrew Wilson, chief executive of the Rarer Cancers Foundation, said: 'The principle set out by David Cameron was that clinicians should be able to prescribe the drugs they believe would benefit patients.

'To put a blanket ban on certain drugs drives a coach and horses through this principle; it completely goes against the spirit of the fund.'

Kate Spall, who runs the Pamela Northcott Fund, a voluntary organisation which acts as advocate for scores of cancer patients, said: 'It's really shocking that in some areas patients are having to cope with a double ban.

'It's the worst kind of postcode lottery. This is not saving people's lives, which is what the Coalition is trying to do.'

A spokesman for the Department of Health said: 'We are not aware that SHAs have drawn up lists of "banned drugs".

'We are confident that the clinically led regional panels are making every effort to ensure that cancer patients have increased access to the effective drugs their doctors recommend for them.

Comment - Page 14

j.hope@dailymail.co.uk

Overtime pay at Christmas? That would be discrimination

A CHAIN of care homes is refusing to pay its staff overtime this Christmas – claiming that it would discriminate against other religions.

The firm said it had an 'ethical belief in equality' which means it cannot favour Christmas over 'other religious festivals'.

Staff at Guinness Care and Support were told that it would only pay bonuses for bank holidays, which rules out Christmas Day and Boxing Day this year because they fall at the weekend.

A worker at the Devon homes said staff expect to work holidays but pointed out: 'The management themselves are on two weeks' annual leave. It has come as a shock and left us stunned.'

Mick Green, senior human resources manager, said: 'We have a strong ethical belief in equality and diversity and are unable to recognise one religious festival over others.'

Staff working on bank holidays December 27 and 28 will be paid overtime.

Cherie Blair

ON November 26, in referring to a magazine's claim that Cherie Blair had attended a shooting party which included Saif Gaddafi, we suggested this was hypocritical and had outraged the families of victims of the Lockerbie bombing. We accept that Mrs Blair did not attend the shooting party and has never met Mr Gaddafi. We apologise for any embarrassment caused.

Take That create another record

POP group Take That's record Progress has had the biggest opening-week sales of any album for 13 years with almost 520,000 sales.

The Official Charts Company said the newly reformed quintet had sold more than the rest of the top ten put together.

Progress is the first to feature the full line up of Gary Barlow, Mark Owen, Howard Donald, Jason Orange and Robbie Williams since 1995.

A spokesman said the most recent album to exceed sales of 500,000 in its first chart week was Be Here Now by Oasis, which sold 663,000 in 1997.

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Our Ref:
Your Ref:

4 April 2012

STRICTLY PRIVATE & CONFIDENTIAL - NOT FOR PUBLICATION

Dear Sirs,

Cherie Blair

We represent Cherie Blair.

It has been brought to our attention that you have recently contacted Ciaran Ward claiming that you have sensitive information regarding our client's health, presumably with the intention of running a story on the matter.

We are not yet sure whether you intend to publish a piece containing this sensitive information. However, there is no doubt that the publication of any story relating to our client's health or even any speculation about the same would constitute a gross invasion of privacy. As you are aware, under Article 8 of the ECHR (which you will know is now incorporated into English law, following the enactment of the Human Rights Act (1998)), everyone has the Right to Respect for their Private and Family Life, their Home and Correspondence. Family life has been held to include, inter alia, medical/health matters.

Accordingly, our client is extremely concerned about any such proposed publication and she is anxious about how you obtained this private information in the first place.

There can be no genuine public interest in publishing material concerning our client's private health matters and it is plain to us that no responsible newspaper or journalist should publish such intensely private information without our client's prior consent.

In view of the above, please confirm by noon tomorrow that you will not publish any article or disseminate any sensitive information concerning our client's health. In the event that you publish an article containing this private information, we are instructed to take legal action immediately.

We look forward to hearing from you by the above deadline.

All our client's rights are reserved.

Yours faithfully

Atkins Thomson