

Statement made on behalf of the Claimant  
Witness: Dominique Morris  
Date of Statement: 20 October 2006

Court of Appeal Reference: A2/2005/1093  
IN THE COURT OF APPEAL (CIVIL DIVISION)  
ON APPEAL FROM THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION

Lower Court Reference:  
Claim No. HQ03X03360

ALIN TURCU

Claimant/ Appellant

- and -

NEWS GROUP NEWSPAPERS LIMITED

Defendant/ Respondent

---

WITNESS STATEMENT OF DOMINIQUE MORRIS

---

I, Dominique Morris, c/o David Price Solicitors & Advocates, 21 Fleet Street, London, EC4Y 1AA, WILL SAY as follows.

1. I am 33 years old. For the last three years I have worked as a security guard for a bank. Before that I worked as a parking attendant for APCOA in Wandsworth, London. I make this witness statement in support of the Claimant's appeal.
2. I began working for APCOA in 2002. While I was there I met Florim Gashi ("Florim"), who was one of my supervisors. A few months after meeting him I became his girlfriend and we had a relationship for approximately a year. We also maintained an on-off relationship for about another year after that.
3. I do not remember when it happened but one day Florim told me that he had a gun. It was certainly after Florim stopped working for APCOA which was in October 2002. He was carrying the gun around in his bag. I was really shocked but he assured me that it was not real.
4. A while later, Florim asked me if I would look after this gun for him. I did not want to but I agreed to because I was in a relationship with him and he was adamant that it was not real and that I would not be doing anything wrong. He told me the reason he wanted me to look after it was because he was concerned about being

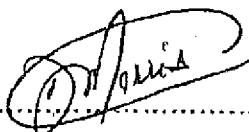
Statement made on behalf of the Claimant

Witness: Dominique Morris

Date of Statement: 20 October 2006

found with the gun. I knew that he had done some work for Mazher Mahmood and the News of the World because he told me that he had done a story for them about one of our colleagues at APCOA relating to drug dealing. He was also frequently on the phone to him but was secretive about their conversations.

5. I have watched video CGB/10. It is difficult to see the gun clearly in the video. However, I can see that it is similar to the one that Florim gave me in several ways. It was a hand gun, was dark in colour and had a disc on the side. In the video the gun is described as heavy. The gun that Florim gave me was also heavy. Although I am not familiar with guns, it did not look fake, it was not like a toy gun and it looked like what I imagine a real gun would look like. I cannot say for sure that it was the same gun but there is nothing in the video or otherwise to make me think that it is not the same gun. I was not aware that Florim had any other gun.
6. I was extremely nervous about having the gun even though Florim said it was a fake. At the time I was sharing a house with a person with whom I was very close. I do not wish to identify him because he has recently died, I am very upset about it and do not want his name dragged into this. I told him about the gun and he was furious. He told me that he would take the gun and keep it. Although as soon as I gave it to him he told me that he was going to get rid of it. I have no idea what he did with it. Florim was very angry with me because he had wanted it back.
7. I believe the facts stated in this witness statement are true.

.....  
Dominique Morris

20.10.06

.....  
Date