

Statement made on behalf of the Claimant

Witness: Conrad Brown

Date of Statement: [] July 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 CONRAD BROWN

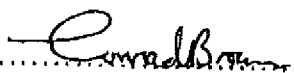
I, Conrad Brown WILL SAY as follows:

1. As explained in my Witness Statements given to the Police (3 and 8 November 2002), and my Witness Statement for the libel trial in this case (1 March 2005), I worked as the recordings expert with the *News of the World* journalist Mazher Mahmood in the investigation into the plot to kidnap Victoria Beckham.
2. I have been told by the solicitors acting for the publishers of the *News of the World* that the man who infiltrated the kidnap gang, Florim Gashi, has given a Witness Statement on behalf of the Claimant/Appellant in which he alleges that during the course of the investigation, tapes were produced which would suggest that the investigation was a "set-up" and that those tapes "never [saw] the light of day". He says that in the Beckham case, "two or three recordings were destroyed" by Mr Mahmood. He specifically refers to a recording dated 24 October (2002). I have read Mr Gashi's statement.

3. I recall from this investigation that my usual procedure was to set up the undercover investigators, Mr Gashi and Mr Qureshi, with either audio or video recording equipment before their various meetings with the gang. Whenever possible, I would then meet them straight after the meetings to collect both the tape recordings and the equipment from them. Only on a couple of occasions when I knew that I would not be available to do this, did I leave equipment with Mr Gashi or Mr Mahmood in advance of a planned meeting.
4. I recall in this investigation that I provided the Police with details of my involvement in managing the covert recordings and the tapes produced (whether audio or video) very shortly after the publication of the article complained of. In my Police statement, for example, I referred to my involvement on 24 October 2002 when there was a meeting in a pub in Brixton involving Mr Gashi and the kidnap gang, which was secretly recorded by Mr Gashi. This tape was subsequently exhibited as "CGB/2". I understand Mr Gashi to be saying that there was a subsequent recording made at the Claimant's home later that night. I am not aware of any such additional recording which I understand Mr Gashi to be saying was made, presumably by him, and subsequently destroyed by Mr Mahmood.
5. I recall that when Mr Gashi was first wearing the recording equipment he was understandably concerned that members of the gang would spot this and he would be exposed as an investigator. I have read paragraph 16 of Mr Gashi's Witness Statement of 21 September 2005. I notice that he merely refers to "*a recording*" which he says was made later on in the night of Thursday 24 October. He does not specify whether this was a video recording or an audio recording.
6. To the best of my recollection, Mr Gashi was first equipped with covert video recording equipment (on 24 October 2002) and following that meeting in the Brixton pub, I not only took custody of the video tape, but I also took back the recording equipment, in the form of a jacket which has a camera sewn into it. I cannot see, therefore, how Mr Gashi could have created a further "*recording*" in the night of 24 October. It was not until a couple of days later that I left Mr Gashi with audio recording equipment and several blank audio mini-disks because there

was the potential for another meeting, but I knew that I was not going to be available to set up the equipment with him.

7. I am not aware, therefore, of any recording from the night of Thursday 24 October 2002. I am also not aware of either that recording or any other recording (whether audio or video), having been destroyed whether by Mr Mahmood or anyone else involved in the investigation. I have not destroyed any recordings forming part of this investigation.
8. The contents of this witness statement are true.



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Conrad Brown

4/7/2006

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Dated