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No. QB-2021-001846

IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION MEDIA AND COMMUNICATIONS LIST [2021] EWHC 3068 (QB)

> Royal Courts of Justice Strand London WC2A 2LL

Tuesday, 5 October 2021

Before:

# MR JUSTICE NICKLIN

<u>BETWEEN</u>:

JEREMY VINE

- and -

ALEX BELFIELD

Defendant

Claimant

<u>GERVASE de WILDE</u> (instructed by Samuels Solicitors LLP) appeared on behalf of the Claimant. <u>MARK HENDERSON</u> (instructed by Henri Brandman & Co) appeared on behalf of the Defendant.

# JUDGMENT

### **MR JUSTICE NICKLIN:**

- 1 Today was the date fixed for the determination of preliminary issues in this libel action. I should make clear at the outset that this hearing, and this judgment, concerns only the claim for defamation. There is also claim for harassment, but that is not, and was never, part of the agenda today. The exercise today was solely the determination of the issues of meaning and fact and opinion that are relevant to the defamation claim.
- I should also make very clear that the Court is specifically not, and would never have been, adjudicating on the merits of any defence to the claim that has been foreshadowed in the various submissions and correspondence that have been exchanged. The Defendant has not yet filed a Defence, and the proceedings are at a very early stage.
- 3 The Claimant is a radio and television presenter. The Defendant is also a radio presenter. I understand that he worked for the BBC for some 15 years. After leaving the BBC, he has set up a YouTube Channel entitled 'Alex Belfield – The Voice of Reason' which has some 281,000 subscribers. He also has a Twitter account which, in April 2021, had some 27,000 followers.
- 4 The Claimant's claim relates to several publications by the Defendant on his YouTube Channel and on Twitter, in the period from May 2020 to August 2020. The Claim Form was issued on 13 May 2021, and served with Particulars of Claim. The Claimant has pleaded claims in defamation arising from seven publications comprising three tweets and four videos. In chronological order these are:
  - a. A YouTube video on 13 July 2020 ("Video 1");
  - b. A Tweet on 23 July 2020 ("Tweet 1");
  - c. A YouTube video on 1 August 2020 ("Video 2");
  - d. A Tweet on 1 August 2020 ("Tweet 2");
  - e. A Tweet on 4 August 2020 ("Tweet 3");
  - f. A YouTube video on 11 August 2020 ("Video 3); and
  - g. YouTube video on 13 August ("Video 4").
- 5 The words selected for complaint in the respective Videos and Tweets are set out in the appendix to this judgment. In respect of the four videos complained of by the Claimant, the words selected for complaint by the Claimant are part only of the relevant video. By way of example, Video 1 lasted for a total of 5 minutes and 15 seconds, Video 2 6 minutes 8 seconds, Video 3 7 minutes 23 seconds, and Video 4 10 minutes 25 seconds. As is apparent from those times and the duration of the videos as a whole, the words selected for complaint therefore represent a very small part of the total broadcast. Finally, the three tweets complained of contained a hyperlink linking to YouTube videos of the Defendant. Tweet 1 contained a link to a video on 29 June 2020, and Tweets 2 and 3 contained a link to Video 2.
- 6 The natural and ordinary meanings pleaded by the Claimant were as follows:
  - a. Video 1:

"there are strong grounds to suspect the Claimant of conduct which would make him liable for the criminal offence of harassment"

### b. **Tweet 1**:

"the Claimant is seriously and demonstrably dishonest in that he has publicly lied about his knowledge of the circumstances in which he received £1000 of public money from the BBC to host a drinks party".

c. Video 2:

"the Claimant is seriously dishonest in that he has publicly and repeatedly lied about his knowledge of the circumstances in which the BBC gave him personally £1,000 by way of donation to a memorial for John Myers".

d. **Tweet 2**:

"the Claimant is seriously dishonest in that he has repeatedly lied about his knowledge of the circumstances in which he wrongly received  $\pounds 1,000$  of public money from the BBC to host a drinks party for radio enthusiasts in an egregious abuse of the BBC's public funding".

e. **Tweet 3**:

"the Claimant is seriously dishonest in that he has repeatedly lied about his knowledge of the circumstances in which he wrongly received  $\pm 1,000$  of public money from the BBC to host a drinks party."

f. Video 3:

"the Clamant is seriously dishonest in that he has repeatedly lied about his knowledge of the circumstances in which he and his friends personally accepted £1,000 from the BBC by way of a donation to a memorial for John Meyers."

g. Video 4:

"the Claimant is seriously dishonest in that he has lied about his knowledge of the circumstances in which he and his friends personally accepted £1,000 from the BBC by way of a donation to a memorial for John Meyers."

- 7 The Defendant filed an Acknowledgement of Service, indicating an intention to defend the proceedings, on 14 May 2021. As I have indicated, the Defendant has not yet filed a Defence. Instead, on 24 June 2021 he issued an Application Notice seeking directions for the trial various preliminary issues. On 13 July 2021, I directed trial of the following preliminary issues:
  - a. the natural and ordinary meaning of the Tweets and the Videos; and
  - b. in respect of each of those publications, whether the meaning found was defamatory at common law, whether it made a statement of fact or included an expression of opinion, and insofar as it contained an expression of opinion, whether in general or specific terms, the basis of that opinion was indicated in each publication.
- 8 These are the conventional directions when the Court decides that issues of meaning, and fact or opinion, should be resolved as preliminary issues. As is now commonplace, I also directed

that, by 27 July 2021, the Defendant must file and serve a written notice of his case on each of the Preliminary Issues, including his case as to the natural and ordinary meaning of each publication. Unfortunately, the Defendant did not comply with that direction.

9 Instead, on 26 July 2021, the Defendant's solicitors wrote to the Claimant's solicitors, as follows:

"On account of [bail conditions] imposed on our client by Nottingham Magistrates' Court on 1 July 2021, it is not considered that he is in a position to provide written notice of his case on each of the preliminary issues lest such notice be construed as being in breach of the said bail conditions."

- 10 The Defendant has been charged with offences under the Protection from Harassment Act 1997, he has entered 'not guilty' pleas, and a trial has been fixed at Nottingham Crown Court for 4 July 2022. This criminal prosecution has no bearing on the preliminary issues that I directed should be determined.
- 11 I struggle to see how, by complying with the direction to file and serve a document setting out his case on the preliminary issues in a defamation claim was, or could be regarded as, a breach of the Defendant's bail conditions. The bail conditions have not, apparently, been regarded as any impediment to other correspondence from the Defendant's solicitors relating to the civil proceedings. But if the Defendant's advisers genuinely thought that this was a realistic prospect, then they should have made an application to the Court to vary the Order of 13 July. Unilaterally deciding not to comply put the Defendant in breach of that Order. On 26 July, the Claimant's solicitors even provided an undertaking that the Claimant would not complain of any alleged breach of the Defendant's bail conditions in respect of communications made by the Defendant's solicitors concerning the civil claim. But, still, the Defendant did not comply with the order of 13 July 2021.
- 12 As a result, on 3 August 2021, the Claimant's solicitors issued an Application Notice seeking an order that, unless the Defendant complied with the order of 13 July 2021 and provided his written case on the preliminary issues, judgment should be entered on the Claimant's claim. The application came before Kerr J as vacation judge on 7 August 2021. He directed that the Defendant should provide his written response to the application within 4 days. In response, the Defendant filed a witness statement, dated 12 August 2021. In it he stated as follows:
  - "8. I am anxious that nothing should take place before my Crown Court trial that could contaminate my right to a fair trial. Obviously, this could be reporting of civil court proceedings on a matter linked to the criminal charges.
  - 9. In any event, it is presently impossible for me to effectively defend my position in relation to the proceedings brought by the claimant. This is for a number of reasons including:
    - (a) My computers and other materials relating to the claimant's claim are presently held by the police.
    - (b) The claimant has secured the removal of the YouTube broadcast in respect of which he complains. I do not retain copies of them. I broadcast approximately 3,800 videos a year. It is simply impossible, or impractical, for me to personally retain copies.

(c) The extracts from the broadcasts included in the claimant's particulars of claim are insufficient for me to provide full and detailed instructions in that the broadcast might last, say, four minutes, and it is unnecessary for the context in which the words have been used to be established."

The Defendant, in that witness statement, indicated that he envisaged making a counterclaim against the Claimant.

- 13 The Defendant still did not make an application to vary the order of 13 July 2021.
- 14 On 13 September 2021, I dealt with the Claimant's application for an unless order on the papers. I varied the directions I had given on 13 July 2021 to require sequential exchange of skeleton arguments for the preliminary issue trial which had, by that time, been fixed for 5 October 2021. I also directed that the Claimant should provide a hearing bundle for the Preliminary Issue trial which was to include the full versions of the YouTube videos complained of. In the reasons for the order, I said this:
  - "(A) The Defendant has failed to comply with two orders of the Court. He will find that further non-compliance may well lead to sanctions being imposed. However, I am not going to allow the noncompliance to derail the Preliminary Issue trial listed for 5 October 2021 which will go ahead. The Defendant has an opportunity to advance his case on the preliminary issues and fairness requires that the Claimant not be ambushed by them. I have therefore adjusted the timetable for skeletons so that the Defendant will provide his submissions on the preliminary issues and then the Claimant can respond to them. The unless order proposed by the Claimant represents a disproportionate sanction for non-compliance. Ultimately, if the Defendant does not engage and refuses to set out his case on the preliminary issues, it is he who is likely to be prejudiced by that failure. The Court will determine the preliminary issues at the trial on 5 October 2021 with or without the Defendant's input.
  - (B) I have read the Defendant's witness statement. I note the criminal trial fixed for 4 July 2022. The trial of the preliminary issues concerns only the Claimant's claim for defamation and will have no impact on the criminal trial. Consideration will need to be given to the timetable of the civil proceedings in light of the criminal trial, but that is an issue that can be addressed once the statements of case in the civil proceedings have been filed (including any counterclaim) and a case management conference fixed.
  - (C) If the Defendant is concerned about media reports of the civil proceedings potentially prejudicing his criminal trial, then he can (and should) make an application for a postponement order under s.4(2) Contempt of Court Act 1981.
  - (D) The detention of the Defendant's computers etc. by the police and the non-availability of the videos complained of appears to be disputed. It can be resolved by the early provision of the Trial Bundle including full copies of the videos complained of. If, notwithstanding this, the Defendant contends that he cannot participate effectively in the

preliminary issue trial, then he will have to apply to adjourn the trial. The Defendant is represented by competent solicitors. The Court expects a little bit more by way of constructive engagement from the Defendant's solicitors on these issues."

- 15 On 29 September 2021, the Defendant filed his skeleton argument. It did not set out his case on the natural and ordinary meaning he contended the various publications bore. On 1 October 2021, the Claimant filed his skeleton argument for the preliminary issues. It noted that the Defendant had not set out any alternative natural and ordinary meaning for the publications complained of. At 13.27 yesterday, 4 October 2021, the Defendant's solicitor sent to the Court, and to the Claimant's solicitors, a "Supplementary Note in light of the points in the Claimant's Skeleton Argument" together with an Annex.
- 16 The thrust of this "Supplementary Note" was to note that the Claimant had selected only part of the YouTube videos sued on for complaint. This led Mr Henderson to contend:

"The claimant clearly did not set out a meaning encapsulating each statement as a whole either in the particulars claim or his skeleton (so he did not interpret the order as requiring the meaning of each statement as a whole rather than the brief snippets of which he complained for his defamatory meaning). The Defendant also did not include a meaning covering the whole of each video. However, he did say that the whole of each video was relevant when considering the common defamatory imputation alleged, and went on to describe the overall content of each video in some detail... He explained that it would be artificial to adopt a 'single meaning' encompassing the whole of each video. The impression on the viewer of the whole video, including the range of criticism appearing in it, of which no complaint is made in libel, is relevant to the task considering the meaning attributed to the very short snippets complained of, whilst remaining loyal to the required impressionistic assessment of the video.

It was not necessary to set out the remainder of the video in 'meaning' form in order to deal with the Claimant's defamatory meaning, but the whole video was the relevant context, hence the impact content was described. To the extent that the Claimant now complains that the Defendant has failed to offer an individual meaning of each video and that his approach to describing each video is inadequate, the Defendant has therefore annexed full summaries, as in the meaning of each video covering the whole of each video, which reflects the summary that he would otherwise have given in submissions. It will be seen that each meaning is lengthy in order to cover the full video, as the Defendant pointed out would be the case were this exercise adopted..."

17 By way of example, in respect of Video 1, the meaning of the full video, which Mr Henderson has confirmed he would be asking the Court to find as the natural ordinary meaning of the video is as follows:

"The claimant has attempted to have the defendant's cancelled and kicked off Twitter backing a criminal with a serious criminal record, who has criticised the defendant and spread lies about him. He is encouraging a hate campaign of his 700,000 followers against the defendant. He has engaged private investigator [name redacted] to investigate the defendant, including phoning the defendant's friends and family. The claimant is continuing to try to cancel the defendant, because the defendant made him look silly in front of 600,000 people who are now curious about why he took  $\pm 1,000$  of public money for a radio industry party.

The claimant presents as fair and balanced like the BBC, but he is neither, and he and [the private investigator] are entitled people using their power to intimidate the defendant. The claimant has incited [the private investigator] to condemn the defendant online in the screenshots displayed and to troll him, his family and friends. The BBC tried to get the defendant arrested twice, following malicious lies by another BBC broadcaster, to end the defendant's career, lies that were repeated by the criminal that the claimant backed and re-tweeted.

The claimant and [the private investigator] are so self-righteous that they think they are too good to be in breach of the law and human rights. He and [the private investigator] have gone from defamation to breach of privacy and harassment against the defendant and are on the verge of behaviour that would enable the defendant to get the police involved in assisting him to get some form of restraining order preventing them from breaching his privacy and harassing him. They are vile entitled people who hide behind the BBC and their front online following, and [the private investigator] threatens him and makes a presumption that the defendant is guilty without investigation. The defendant would welcome any private information on the claimant and [the private investigator, so that he can see how they like it."

- 18 That is a very substantial meaning for the Court to be invited to find, and it appears to me having considered it in the short time available for this hearing – not properly to concentrate on what are said to be the defamatory imputations concerning the Claimant. The Defendant contends that the Court should, in considering the meaning of the various videos, look at the entire context, i.e. the full broadcast. As a proposition, that is uncontroversial. However, what has come across clearly to me, and has rather been confirmed in Mr Henderson's submissions today, is that the Defendant is in fact urging the Court find one or more general stings, relying on the wider context of the broadcast, rather than the specific imputations articulated by the Claimant.
- 19 These submissions have been difficult to follow. The original Skeleton Argument did not identify the Defendant's case on meaning, and the supplemental submissions have done little to clarify the Defendant's position. It is tolerably clear to me that the Defendant wishes to rely upon the entire YouTube videos complained of by the Claimant as being relevant both to meaning and to fact/opinion, but beyond that the precise case he is advancing is very far from clear. That has important ramifications.
- The parameters of the exercise the Court is trying to carry out are very well established: see *Koutsogiannis v Random House Group Limited* [2020] 4 WLR 25 [11]–[17]; *Corbyn v- Millett* [2021] EMLR 19 [7]–[13]; and *Bokova v Associated Newspapers* [2019] QB 861 [3]–[10].
- 21 Determination of meaning and fact and opinion must be carried out having clearly in mind some of the other cardinal principles of defamation law, in particular:
  - a. When determining the natural and ordinary meaning, the publication is to be read as a whole. Where the claimant selects part only of the publication, the defendant is entitled to rely on the whole of the publication. A claimant cannot "use a blue pencil upon words published of him so as to change their meaning and then prevent the defendant

from justifying the words in their unexpurgated form": **Polly-Peck** (Holdings) plc -v-Trelford [1986] QB 1000, 1023g per O'Connor LJ.

- b. A defendant cannot seek to defend a separate and distinct imputation which is not complained of by the claimant. A defendant is permitted to defend a common or general sting if, upon proper construction, the words complained of bear that meaning. Whether a publication conveys a "separate and distinct" defamatory imputation is a matter of fact and degree: *Warren -v- Random House* [2009] QB 600 [102]; and *Rothschild -v- Associated Newspapers Ltd* [2013] EMLR 18 [24].
- c. If a defendant seeks to contend that, in their proper context, the words complained of by a claimant in a defamation claim bear a common sting, then it is important that it identifies this common sting and advances it at the trial of any preliminary issue as to meaning: see *Bokova* [43].
- 22 For the fair determination of natural and ordinary meaning, and fact or opinion, it is important that the Defendant sets out clearly the case he is advancing. Conventionally, a Defendant's case on these issues would be set out in his/her Defence. Where the Court directs trial of preliminary issues prior to service of the Defence, it will order that the Defendant's case on those issues is set out clearly, in writing, in advance of the hearing. As noted in the reasons for my order of 13 September 2021, quoted above, a Defendant who does not clearly articulate his/her case on preliminary issues to be determined risks being prejudiced by that failure, in particular by the way identified in **Bokova** [43].
- 23 The position that faces the Court today is very far from satisfactory. It should have been a simple matter for the Defendant to set out his case on the preliminary issues. If he had wanted to advance a case, relying on the proper context of the words complained of as part of the relevant videos, it would have been straightforward for him to have done so. If important to his case on meaning, he could have identified the particular passages on which he relied in support of his contentions as to the natural and ordinary meaning of the words. If, based on that, or more generally, he had wanted to contend that, in their proper context, the publications each conveyed a general or common sting then that needed to be identified. The Defendant has not done so. Instead, I have written submissions that make confusing and, in my mind, confused submissions that do not identify clearly the case that the Defendant is advancing.
- I have explored with counsel this morning what the Court ought to do. I could proceed to resolve the preliminary issues, and this is the course urged by Mr de Wilde on behalf of the Claimant. If the Defendant was prejudiced by his failure to identify any "common sting" then that was his fault for having repeatedly failed to comply with the Court's orders and directions. I remind myself that, in the reasons order of 13 September 2021, I stated that the Court would not allow the proper case management and progression of this claim to be derailed by the Defendant's failure to comply with the orders of the Court. I also accept that the matters to be resolved are questions of fact to be determined applying the conventional principles I have set out above. Save for the hyperlinked videos and the Tweets, this exercise is done, respecting the well-established parameters, without reference to any extrinsic evidence. They are, therefore, conventionally straightforward issues to be determined, and there are clear attractions in getting on with things.
- 25 Nevertheless, I have reluctantly reached the conclusion that simply ploughing on would risk unfairness to the Defendant. Recognising the force in that, Mr Henderson has made an application this morning that the Court should not go on to determine the preliminary issues today. Instead, he agrees that that the Court should direct service of a Defence. A claimant is entitled to know the case he has to meet at the trial of the preliminary issues properly in

advance of the hearing. I have no doubt that Mr de Wilde would have been in a position competently to advance the Claimant's case today but, it seems to me that this is a dangerous area for the reason identified in *Bokova*. Issues as important as the determination of preliminary issues in defamation proceedings should not be allowed to become some sort of moving target, and in the Defendant's own interests, his full case in relation to the preliminary issues must be advanced clearly and argued properly.

- I have concluded that the best way of ensuring that clarity is achieved on the issues that the Court has to determine is to formally adjourn the trial of the preliminary issues, and to direct the Defendant to file a Defence in the proceedings. Drafting his Defence will focus the Defendant's mind. The Defence will set out the Defendant's case on meaning, including any case on the context and common sting. It will anchor that case to any defences of truth or honest opinion. By that process, the parameters of those defences will be clearly identified. At that point, the exercise of identifying and articulating the Defendant's case in relation to meaning and fact and opinion should have been achieved. If it is not, then, as I indicated during argument, there may well be applications to strike out the relevant part of the Defence.
- 27 If the Court reaches the conclusion that the Defendant is not assisting in the process worse, that he is obstructing the fair resolution of the issues that require determination in these proceedings then the Court has an array of sanctions that can be imposed, including, ultimately, a sanction that the Defence is struck out and judgment is entered. It is in the Defendant's own interest that he ensures that his Defence properly identifies the case that he wishes to advance in answer to the Claimant's claim.
- 28 Ultimately, once the statements of case have been exchanged there will then follow in the usual course, a CCMC at which the Master will consider whether to direct the trial of the preliminary issues, that were previously ordered by the Court, and potentially any other preliminary issues that might arise for determination, for example, as I have already indicated, there has been reference to the Defendant envisaging a Counterclaim against the Claimant. If that is a claim for defamation then there may very well be issues to be determined, on a preliminary basis, as to the meaning to be attached to those publications and, indeed, whether they also raise issues of fact and opinion.
- 29 If there is a trial of natural ordinary meaning as a preliminary issue following the service of a Defence and Reply, ultimately, it may turn out that the Defence filed may need amendment. That may lead to wasted costs. If so, that will be a direct consequence of the failure by the Defendant properly to engage with the identification of issues enabling their fair resolution prior to service of the Defence. As I noted in argument, it is ironic that the Defendant's actions have now derailed the resolution of the preliminary issue that he, himself, asked the Court to direct.
- 30 Therefore, the order today will be that the preliminary issues, as directed by the Court, will be adjourned. They will be reconsidered once the statements of case by the parties have been filed at the CCMC that will be fixed in due course once the statements of case have been exchanged and the issues identified.

### LATER:

I am going to deal with the issue of costs now. There are two stages to it: first is the principle. I have explained in the judgment what has happened today and why the Court has taken the step it has. In summary: as a result of a failure by the Defendant to comply with orders of the Court, principally the order in relation to originally setting out in a written statement of case its position on the preliminary issues that were due to be determined at trial, the Court has had to abort the exercise that would ordinarily have been a straightforward one. Very significant culpability in my judgment falls on the shoulders of the Defendant, and it is quite right, in my judgment, that he ought to pay the costs that have been thrown away by this exercise.

- 32 The Court needs to make clear to litigants that non-compliance with orders will ordinarily lead to the imposition of sanctions. Where they disrupt the proper management of litigation that will almost inevitably follow. That has been the consequence of this failure to comply, and it is a serious failure to comply.
- 33 Mr Henderson has pointed out that the Claimant has failed to serve the relevant statements of costs in support of the application for costs that has now been made. He has referred me to the Practice Direction to CPR 44 §§9.5(4) and 9.6. The effect of those provisions is that the failure to serve a statement of costs is a relevant matter for the Court to consider both when deciding the issue of costs and any assessment of those costs.
- 34 Notwithstanding the failure to serve the statement of costs, I am nevertheless satisfied that, as a matter of principle, the Claimant is entitled to the costs of the application that was made before Kerr J, that led to his order of 7 August, and also the costs of today. These costs have been wasted as a result of a failure to comply the Court's orders and directions which has led to this hearing having to be aborted.
- 35 Turning to the assessment of those costs, the failure to serve a statement of costs disables the paying party from having an opportunity to consider whether there are objections that can be taken to the costs. I did offer Mr Henderson and the Defendant the possibility of adjourning until 2 o'clock to enable instructions to be taken but Mr Henderson rejected that in favour of inviting the Court to deal with the matter by directing that the costs should be subject to a detailed assessment, if not agreed. In order, therefore, to preserve the proper opportunity of the Defendant to raise such points as he considers he can to challenge the costs sought to be recovered under the costs order that I have made, I will direct the detailed assessment of those costs if they are not agreed.
- Mr de Wilde, on behalf of the Claimant, has applied for a payment on account of those costs. Such application appears to me to be irresistible in the circumstances, there can be no reason (and none is advanced) why a payment on account should not be ordered. The total sum in the statement of costs is just short of £31,000, possibly £32,000. I have looked myself at the statement of costs and considered the time, particularly the identified time spent certainly in relation to the application before Kerr J. I would be surprised if any significant dent was made in those costs on any detailed assessment. There is slightly more that is available for argument, potentially, on a detailed assessment of costs in relation to the costs of today. Taking all of those factors into account and doing the best I can, the sum that I will order to be paid by way of payment on account of those costs is £25,000.

# <u>A P P E N D I X</u>

Words complained of by the Claimant as pleaded in the Particulars of Claim. Where particular words have been selected for complaint, these are shown underlined:

#### (1) Video 1

"You lowlife prick. You want to get a private investigator. We understand you've paid this guy. He's already admitted you've engaged him. You're the one who has incited him to try and troll me and my family and friends.

•••

This is the problem you see, with the righteous. This is the problem with sanctimonious pricks like Jeremy Vine. They think they're above the law. They think they're above human rights. You are now invading my privacy. You are now harassing me and are on the verge of a section 2, both of you. So this is now gone from a defamation case to now me being able to get the police involved.

•••

If anybody has any private information on [name redacted] or Jeremy Vine, do send it to me and I'd like to out them, yeah. Anybody got their numbers for their family members or friends, maybe I could call them. See how they like it. Scum sucking pondlife. Carry on now. This is fun now. This is great..."

#### (2) **Tweet 1:**

" $\land$  SHARE  $\land$ 

### (3) Video 2:

"Jeremy took £1000 to host an event for a load of radio anoraks to have free drinks at a drinks party as it is described in the BBC FOI. Three months ago we brought this story to you and asked Jeremy why he took £1000 to have drinks on behalf of somebody who would have been absolutely appalled, the brilliant John Myers.

For those thickos who don't quite understand my point of principle. It isn't about John Myers. He's a hero of mine and a legend. He loved the BBC and hated the waste. He was disgusted by what was going on at the BBC and wrote reports about it. It's not about him. It's not about the memorial. It's about the principle of the £1000 that the BBC gave of our money. If they gave it to Jeremy Vine for John Myers, why can't they give it to me for my Auntie Fanny. It's the point of principle.

He wanted to have one in London and asked the BBC for money. He was given £1000. The BBC have confirmed this in writing yet Jeremy, even this week still continues to bait my audience to deny that he knows anything about it. The man is a liar. How can the BBC endorse a liar? He does know about the £1000. He does know he accepted it and he does know he bragged about it at the London Palladium when he gave it away.

<u>The more you lie on Twitter the more I'm going to talk about it</u>. So far 2 million minutes viewed. 2 million minutes viewed talking about you Jeremy. And Jeremy I need to say thank you. Jizza had it not been for you I would not have had 80,000 subscribers that now fill my channel and give me the biggest voice I've ever had. Because of you, your duplicity and your continued lies that you know nothing about £1000 that you were given for a piss up. Now do the right thing and give the money back."

### (4) Tweet 2:

### (5) Tweet 3:

"Fuck me, Jeremy Vine has Alzheimer's! She still can't remember ANYTHING about the £1000 of licence fee £ spent at a piss up HE HOSTED & & bragged about giving away @Palladium. LIAR (:) I \sqrt{2} [link to YouTube video] Jizza, take your bike sadly out of your anus & GIVE IT BACK"

### (6) Video 3:

"What's the matter with Jeremy Vine? What's up with him? He should be busy, being with his family. His daughter, his wife, but no, he's encouraging trolls on the tippy tappy. <u>Arguing with morons and defaming me and continuing to lie about his knowledge of the £1000 that he was given\_with his radio cronies for a party, a drinks party that raised so much money they gave licence fee money away to charity.</u>

•••

When are you going to stop encouraging thicko trolls who are obsessed and mentally ill and when are you going to stop lying about lack of knowledge about the £1000 that you and your cronies accepted for a drinks party that you later gave away?"

# (7) Video 4:

"I loved John Myer s, but this man would have been appalled at the fact that the BBC gave  $\pm 1000$  of public money for him, Jeremy Vine and his mates to have a piss up for him then to give away a cheque and brag about it and he's been caught out.

•••

Only I have the FOI, right, and in that it says they were given £1000. I'll have my day in court."

\_\_\_\_\_

### **CERTIFICATE**

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