Page 3 Laurence Moffitt 16 August 2013

left the PBCC around 5 years ago. Your allegations against our client in relation to Bryony are just as ludicrous and without foundation but for the avoidance of doubt, Mr Christie never authorised or ordered the attempted kidnapping of Bryony at any time.

Mr Christie has no idea what you may be referring to when you allege as you do that he attempted to intimidate former church members with the use of brutish bailiffs. This allegation is similarly false and defamatory as is the allegation of "thuggery".

## Bluewater

On 7 July 2013 you published the following tweet:

"@David\_Cameron @hmtreasury Bluewater packaging group companies defraud UK Government of many millions #PBCC"

This is a very serious defamatory allegation which you have deliberately sought to draw to the attention of the Prime Minister of this country and HM Treasury, the Government department responsible for tax and finance. You allege that the companies belonging to Bluewater Packaging Group are guilty of defrauding the government of "millions". You have not elaborated on the nature of the "fraud" that is said to have taken place and our clients quite simply have no idea to what you may be alluding. In any event, the allegation is utterly false. There are no grounds whatsoever for suggesting that our client has defrauded the UK Government or HM Treasury or any other person or entity for that matter. You will appreciate that fraud is an extremely damaging allegation to level at a company and that it has the potential to do very serious financial harm to our clients. Indeed it is a criminal offence punishable by up to ten years imprisonment. Even an investigation could costs tens of thousands of pounds or more.

Bluewater are extremely concerned about the damage caused as a result of the above tweet. The members are aware that rumours about Bluewater have been circulating, including amongst competitors, regarding tax irregularities and other negative comments as a result of your tweet. It is likely that serious financial loss will be suffered as a result of your defamatory tweet.

## Publication

It is obvious that the tweets complained of have been published to a wide audience. You have a public account which means that your tweets are visible to anyone with access to the internet. You have 103 followers, including a number occupying important public positions and who are likely to have seen the tweets complained of not to mention the fact that you directed the Bluewater tweet to David Cameron and HM Treasury. One of your followers is Andrew Selous MP, your local member of parliament. Furthermore, as was entirely foreseeable, the tweets