

IN THE HIGH COURT OF JUSTICE

Claim no: HQ10D04078

QUEEN'S BENCH DIVISION

BETWEEN:

RECEP TAYYIP ERDOGAN

Claimant

and

TELEGRAPH MEDIA GROUP LIMITED

Defendant

STATEMENT IN OPEN COURT

Claimant's Counsel

My Lord, I appear for the Claimant in this libel action, Recep Tayyip Erdoğan.

The Claimant is the Prime Minister of the Republic of Turkey and has been so since 2003. He is also the leader of the ruling AK Parti and has held that position since 2001.

The Defendant is the publisher of The Daily Telegraph and the website www.telegraph.co.uk.

On 15 September 2010 the Defendant published in the print edition of The Daily Telegraph an article headed "Iran gives Turkey's ruling party £16m after vote on reforms". In addition, from 14 September until on or about 27 September 2010, the Defendant published on its website an article headed "Iran donates \$25 million to Turkey's ruling party". These articles contained false and defamatory allegations about the Claimant.

The articles alleged that the Claimant had "improperly negotiated and accepted a donation of \$25 million to his political party from a foreign state, namely the Islamic Republic of Iran, in order to further his party's campaign in a forthcoming general election. In doing so, the articles alleged that the Claimant had improperly allowed a foreign power to influence, and interfere in, the internal democratic processes of the Republic of Turkey and AK Parti policy; and had thereby seriously compromised the integrity of his party. This was unlawful and would have constituted a criminal offence under Turkish law".

Neither the Claimant nor his party has negotiated any deal of the kind alleged with the Islamic Republic of Iran or with any Iranian institution, entity or individual. Similarly, neither the Claimant nor his party has accepted any donation of any kind from the Iranian Government or from any Iranian source.

By reason of the publication of the words complained of the Claimant has been seriously injured in his reputation both personally and as a politician and has also suffered considerable distress and embarrassment.

My Lord, the Defendant now accepts that it was misinformed and the allegations are untrue. It has agreed to join in the reading of this statement, withdrawing publicly its false allegations

and apologising to the Claimant for the injury, distress and embarrassment caused to him by the publication. It has also agreed to apologise in terms that are acceptable to the Claimant on the pages of its newspaper and on its website.

In addition, and as a mark of its regret, the Defendant has agreed to pay the Claimant a substantial sum in damages together with his legal costs. In those circumstances, the Claimant is satisfied that his good name has been vindicated and accordingly is content to let the matter rest.

Defendant's Solicitor

My Lord, on behalf of the Defendant, I confirm what has been said by my friend. The Defendant accepts that it was misinformed and offers its sincerest apologies to the Claimant for the allegations appearing on its articles. It is pleased to have this opportunity to set the record straight.

The Claimant's Counsel

My Lord, with that I ask for permission for the record to be withdrawn.