

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
Claim Form Issued: 31 October 2003

CLAIM NUMBER: HQ03X03360

BETWEEN

ALIN TURCU BOGDAN STEFAN MARIS

Claimant

- and -

NEWS GROUP NEWSPAPERS LIMITED

Defendant

DRAFT AMENDED PARTICULARS OF CLAIM

1. The Claimant is of Romanian descent, ~~aged 20~~. He came to England in August 1999 and entered employment as an office junior.
2. The Defendant is the publisher of *The Sun* and the *News of the World* ("NOW"), respectively national daily and Sunday newspapers with very large and influential circulations in England and Wales.
3. In all editions of the issue of the NOW of 3 November 2002 on pages 1, 2, 3, 4, 5, 6 and 7, the Defendant published the following words, photographs and captions ("the NOW articles") which are defamatory of the Claimant:

09-JAN-2007 19:25 FROM

TO 02074052296

P.04

[Front Page]

[Headline]

"POSH KIDNAP"

[Box Headline]

"WORLD EXCLUSIVE We stop £5m ransom gang"**"Moment NEWS OF THE WORLD saves Victoria and her sons from thugs"**

Armed police surround an international terror gang preparing to kidnap David Beckham's wife Victoria and their two young children yesterday.

They were arrested after our reporters infiltrated the group who were planned to ransom Posh for £5m or kill her. One of our team, at the top right of this picture, was in on the raid. Cops stepped up security today as one thug remained on the loose.

Det Insp Ian Horrocks of Scotland Yard's kidnap unit said "You've done a fantastic job taking on dangerous criminals". Victoria 26, said: "I'm incredibly grateful".

[Photograph of four armed police officers pointing guns at four men standing by the boot of a car]

Victoria: 'I'm in total shock'. More pictures, the full story 2, 3, 4, 5, 6 & 7."

[Photograph of David Beckham]

[Photograph of Victoria Beckham]

[Pages 2-3]

[Headline]

"DON'T EVEN BLINK Gun cops arrest five"

This is the moment News of the World undercover reporters smashed the heart out of a murdering kidnap gang on the brink of snatching Victoria Beckham and her two little children.

They planned to demand a £5 million ransom for her life.

But after weeks spent infiltrating an Eastern bloc crime syndicate, we lured senior members to the car park of the Ibis hotel in east London's Docklands.

The gang believed we were going to pay £45,000 for art treasures they had stolen from a vault at world-famous auction house Sotheby's.

But at a pre-arranged signal from us, almost two dozen officers of Scotland Yard's elite SO19 firearms team, many of them hiding in the back of a non-

descript white DAF van, leapt out screaming: "Armed police, get on the floor. Get on the floor."

As each of the stunned gang members slumped onto the tarmac in pouring rain, officers kept their Heckler & Koch automatics trained.

It was a stunning end to an operation in which our reporters dally risked death as they teased out information from the kidnap gang.

The thugs had even smuggled a chloroform-based attack spray from Italy to knock out Victoria, little Brooklyn and baby Romeo after ambushing their car. It was a carefully thought out plan with access and exit routes already prepared.

By midday yesterday everything was in place.

We picked a deserted part of the car park so there would be no danger to any members of the public. In a separate operation, another armed police team headed for an address in Surrey where we expected other gang members would be holed up.

The action began at 12.35pm when three members of the gang – Luli Azem Krifsha, Jo Rivas and Jay Sorin – arrived at the Ibis in two cars. Both pulled up next to our man's Mercedes.

"We want to do this quickly", said Luli, "You inspect the goods, we count the money and we're out of here".

Rivas, a 6ft 2in heavyweight with swept-back hair, added: "We don't want to hang around". The men gathered round the boot of Luli's green Renault Laguna as he proudly showed off his haul. Hidden in a black binliner was a valuable landscape painting. Next to it, in carrier bags, were a jewelled crown and rare antiquarian books worth thousands of pounds to collectors.

Our investigator nodded his approval and reached for his phone to call for the cash – the signal for cops to pounce – praying the police would be watching in the teeming rain.

The white DAF screeched to a halt beside the Laguna, the back doors flew open and 12 officers armed with automatic weapons jumped out.

Even one of our investigators was spread-eagled on the ground.

"Where firearms are involved we cannot afford to take any risks" said one armed officer.

"These guys could be armed and it would be putting you at risk if they thought you were involved in their arrest".

The shocked trio were arrested on suspicion of theft and kidnap, bundled into separate cars and taken to Charing Cross police station for questioning.

Meanwhile a dozen SO19 officers wearing helmets, goggles and body armour turned up at a four-storey block of flats in Morden, Surrey. Two gang members called Adrian and Ali were out but about an hour later Adrian arrived in a black Ford XR2 accompanied by his Spanish girlfriend.

Both were arrested and taken to a nearby police station for questioning. CID then arranged for the removal of three vehicles outside the flat which they believe are linked to the gang.

Ali was still on the loose last night.

Det Insp Ian Horrocks, of Scotland Yard's kidnap and specialist investigations unit, told the News of the World "You've done a fantastic job and taken on dangerous criminals. We're extremely grateful for your information."

[Photograph of Jay Sorin]

Jay: In bar-windowed van

[photograph caption]

[Photograph of Luli Azem Krifsha with a policeman]

Luli: With police guard

[photograph caption]

[Photograph of four men standing by the boot of a car]

"SET-UP *Our man pretends to study the theft haul as gang member waits for cash to be paid over"*

[photograph caption]

[Photograph of Luli Azem Krifsha, Jay Sorin and Joseph Rivas and another man standing by the boot of a car and two armed police officers]

"TRAPPED *After our pre-arranged mobile phone signal armed police jump out of their DAF van"*

[photograph caption]

[Photograph of two men lying on the ground and two crouching surrounded by six armed police officers]

"FLOORED *They shout 'Armed police, Get down on the floor'. Gang members don't know what hit them".*

[photograph caption]

[Photograph of four men lying on the ground surrounded by eight armed police officers]

"CUFFED *The cops, in Day-Glo jackets with 'Police: SO19' on the back, move in with handcuffs."*

[photograph caption]

[Photograph of three men lying on the ground surrounded by six armed police officers]

"NICKED Jo Rivas face down outside the east London hotel before he and cronies are bundled away"

[photograph caption]

"IF BECKHAM DON'T PAY UP, SHE DIES – Pages 4 and 5"

[Page 4]

[Headline]

"If Beckham don't pay up, she dies"

A DETAILED plot to ambush Victoria Beckham as she emerged from her Hertfordshire home, sedate her with a chemical spray then imprison her in a secret cell was foiled because the getaway driver was an undercover News of the World reporter.

"We take her to a safe house in Brixton and wait until the money is transferred to our overseas account" said Albanian immigrant Luli Azem Krifsha.

A senior member of his 'snatch team', a thuggish Romanian named Jay Sorin, also briefed our man: "If the kids are with her, it's even better. We ask David Beckham for £5 million. It's 100 per cent he pays. But if something happens and he don't pay, Victoria is going to die".

Our investigators realised virtually from the start of our operation that it was the sheer level of detail, forward planning, surveillance, recruitment and funding for the project that set this plot apart from the usual loose criminal fraternity talk of kidnapping a celebrity. This was deadly serious and about to take place.

The breadth of the crime syndicate's operations became apparent when an underworld informant offered an introduction to a gang largely composed of Romanians and Albanians, some of them asylum seekers. They were, we were told, "very heavy duty".

Our operation began just over three weeks ago.

Prison

Our main investigator's cover story was that he was an accomplished getaway driver. We supported this with a CV that included a fake criminal record plus the name of a 'referee' inside Manchester's Strangeways prison who would vouch for our man. That referee is also a News of the World contact who was told to expect a 'check call' from the gang during a prison visit.

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A second investigator, introduced alongside the first and with a similar checkable cover story, pretended to be a wealthy crook.

We had been told that at least one of the gang members was armed at all times. Any meeting could have ended in disaster.

But our team knew they were in when, three Saturdays ago, gang leader Luli agreed to meet our 'rich crook' investigator in London's Tower Hotel, close to Tower Bridge. He wanted to discuss the sale of a £250,000 jewelled Arabian crown stolen from London auction house Sotheby's.

It was the deal that ultimately led to their downfall in an east London car park yesterday.

Crammed in a cubicle in the Gents, he proudly showed off the diamond, ruby and pearl encrusted treasure.

"It dates back to the 18th century. It comes from a safe in Sotheby's" he said. "We've taken £4 million worth of stuff. It won't show up as stolen".

He also said he has a painting by a 17th century Dutch old master plus rare books. "You can have the whole lot for £45,000", he said. Our man stalled, asking for time to consider the deal. A former friend of Luli later told us: "They've got a man on the inside on their payroll". Sotheby's didn't know the treasures were missing until we told them.

But kidnapping Victoria Beckham was to be their most ambitious project yet. Our investigators were horrified at the cold-blooded planning that was taking place.

We engineered another meeting with Luli and, with greed overcoming his caution, he explained the method of attack.

"We can pull this off," he said. "Getting Victoria isn't going to be difficult. We just have to make sure we get the money, that's the hard part. I can't believe her security is so bad. I have a friend who works in a hairdresser's where Victoria has had her hair done. On that occasion she had only one minder, outside the shop". The plan, it emerged, was to ambush Victoria's car as it pulled out of the drive, force entry and sedate everyone inside with a chloroform-type spray already brought in from Italy.

"Even if you don't point it at the face it still works," explained Luli, who lives in a block of flats in Battersea, south-west London.

Bottles

"It takes about three seconds to work and the person will be asleep for roughly half an hour".

Jay, who was with him at the meeting, confirmed: "When you shoot it, it's like gas. Terrorists use it. You also get it in little bottles. If you break them everyone

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goes to sleep". From there Victoria – along with three-year-old Brooklyn and two-month-old Romeo if they were with her – would be transferred to the gang's car and driven to a house in Brixton, south London, where a reinforced room would be waiting for them. This was where our 'getaway driver' would come in.

Jay added: "She has to disappear, nobody can see her face, nothing. Victoria and Beckham are the most loved couple in Britain. We can be certain the police will be on our asses."

"We'll wait in Brixton until the ransom money is transferred to our overseas account", said Luli.

Jay's special sphere of responsibility was arranging that money transfer. "Ninety-three percent of kidnapers screw up when they try to get the money," said Jay, who owns two houses in West Croydon.

Meanwhile, we were arranging meetings with other members of the team, building contacts and trust.

The first of these meetings took place a few days after the Sotheby's jewels deal at The Prince of Wales pub in Brixton, south London.

Here our driver was introduced to thuggish Joseph Rivas. He regarded us suspiciously but eventually accepted the cover story.

Meanwhile, we kept up our dialogue with Luli and discovered more about the plot.

"We can pull this off," he said. "Getting Victoria isn't going to be difficult. We just have to make sure we get the money. That's the hard part".

He had handpicked a nine-man abduction team.

The next meeting took place a few days after the Brixton rendez-vous in another south London bar. This time we met Adrian, the man with the gun.

Adrian took the lead in discussing Man Utd and England star Beckham. "He will give his life, not just his money, for his wife", said Adrian. Later he showed off his 8mm handgun.

"This is my best friend, I keep it with me all the time," he added. "I'll supply you with one. It's a powerful Mauser. Very safe, very powerful and quiet."

Referring to the getaway drive after the Posh Spice ambush, Adrian added: "The boss has agreed you'll get £15,000."

Last Tuesday afternoon we joined Luli's sidekick, Jay, and two other gang members using the names Peter and John for a drive to Sawbridgeworth in Hertfordshire.

Here the gang studied approaches to the Beckhams' mansion – part of the month-long surveillance. "We've got three seconds before she realises what's happening," said Jay.

Risk

Last week, too, a News of the World man was present when Luli and his gang held a meeting at a restaurant called Atoca in Wandsworth, south London.

It was the first time we had seen any hint of dissent in an otherwise well-oiled operation.

"I will ask Beckham for £5 million, for him that's like spending a few pence on a cup of coffee," said Luli.

A Romanian called Adrian suggested they would do better to ask for just £1m and guarantee a quick payout.

"They'll pay immediately, less than 24 hours," he said.

Luli ridiculed the suggestion: "You think I'm going to risk prison for £1m. For £1m you can take me, and my brother will pay that to get me back!"

Referring to the Beckhams, he added: "People like that could transfer millions to a bank account instantly."

Adrian replied: "The money is not the problem for them, we already know that. The problem is how to take the money." Joseph, who bragged that he had been involved in the Sotheby's thefts, chipped in: "We'll ask for £5 million."

Also at the meeting were Jay and the youngest member of the gang, a 19-year old named Ali. "He will be helping us keep watch on Victoria," explained Jay. "He's very good at surveillance work."

The gang were weeks away from carrying out their plans, aiming to kidnap Victoria before Christmas.

Now after yesterday's police raid, they face their own very bleak New Year.

[Photograph of Adrian Pasareanu]

THE GANG GUNMAN: *Thuggish Adrian pulled out Mauser and said, 'This is my best friend. It's very powerful'*

[photograph caption]

[Photograph of Joseph Rivas]

JOSEPH: *Bragged he was part of jewel heist*

[photograph caption]

[Photograph of Luli Azem Krifsha and Jay Sorin]

PARTNERS IN CRIME: *Luli, left, and Jay. 'If the kids are with Victoria it's even better' said evil Jay chillingly*

[photograph caption]

[Photograph of the Claimant-Tureu]

BABY-FACE: *But Ali is the surveillance expert*

[photograph caption]

[page 5]

[Photograph of four men standing outside a house]

THE PLOT
CASE THE JOINT *Gang members outside the gatehouse at the entrance to Posh and Becks' drive*

[photograph caption]

[Photograph of Victoria, Brooklyn and Romeo Beckham]

THE TARGETS *Victoria with Brooklyn and Romeo*

[photograph caption]

[Photograph of Joseph Rivas and Luli Azem Krifsha]

WICKED *Jo, left, and Luli plot.*

[photograph caption]

[Photograph of a canister]

Right: A canister of attack spray

[photograph caption]

[Photograph of a Brixton station sign]

HIDEOUT *Gang planned to keep Posh and kids in Brixton*

[photograph caption]

[Photograph of Victoria Beckham in a car]

IN PERIL *Hit squad planned to ambush Victoria as she drove her car*

[photograph caption]

[Photograph of the Beckhams' house in Hertfordshire]

PALACE *The Beckhams' home*

[photograph caption]

I'M IN TOTAL SHOCK: PAGES 6 & 7.

[page 6]

Maz the amazing

To foil the Beckham kidnap plot and bring you today's front-page story our journalists infiltrated a vicious gang.

Yet again Investigations Editor Mazher Mahmood – famous as the Fake Sheikh – pulled off a fantastic professional job.

Mazher is no stranger to danger. In exposing would-be kidnappers, contract killers and drug dealers he regularly puts his life on the line.

His work has achieved an astonishing 119 convictions. In unmasking child molesters, immigrant smugglers and gun runners, he has saved countless lives and prevented untold misery.

Mazher and his brave colleague Conrad Brown are what fearless popular journalism is all about.

No wonder politicians and celebrities with dark secrets live in terror of them. But power, riches and influence will never deter Maz and Conrad.

Along with a thankful David and Victoria Beckham, we are immensely proud of our courageous duo.

[page 6]

[Headline]

Pair always on alert for gangsters

David and Victoria Beckham have suffered a series of security nightmares since getting married. Three years ago police probed an underworld plot to kidnap their son Brooklyn, then eight months old, and hold him for ransom.

It is believed one plan was to snatch Posh Spice and her baby while David was playing for England against Scotland at Wembley that November. The threat was uncovered when intelligence officers intercepted calls between members of a well-known gang of crooks.

Last night a police car was stationed outside the Beckhams' house. The couple have been reluctant to use minders on family trips but it has been reported they hired five SAS men to guard their youngest son Romeo.

The couple are also thought to have considered buying a bullet-proof car.

During the 1998 World Cup, Becks and his family suffered a hate campaign after he was sent off and England went out against Argentina. The star was sent bullets with his name engraved on them.

David's parents, Ted and Sandra, were guarded around the clock after yobs abused them on their doorstep and sent hate mail.

A few days later cops had to rush to Beckham's side after a 12-strong mob targeted him while he was in his Range Rover.

[Photograph of David Beckham]

STAR: Becks plays for United yesterday

[photograph caption]

[Photograph of policeman and police car]

ON GUARD: Police car outside Becks' house

[photograph caption]

[Photograph of CCTV cameras on a house]

WATCH: Cameras at Becks' Hertfordshire home

[photograph caption]

[page 6]

[Headline]

***I'm in total shock
POSH THANKS US FOR HELP***

SHATTERED Victoria Beckham last night spoke of her "absolute and total shock" at the kidnap attempt.

After learning the full details of the planned crime she told the News of the World: "I'm stunned by what has happened today.

"It's clear these people were serious. It's terrifying that someone would want to do that to you and your children. I'm in absolute and total shock."

Victoria thanked the News of the World and our Investigations Editor Mazher Mahmood for our part in bringing the horrifying drama to an end.

She added: "I'm incredibly grateful to the News of the World and to Mazher for everything you've done here. You've clearly had the best interests of my family at heart and we appreciate it very much."

Family

Victoria said she would be talking to her security team to assess any further risks to her and her family.

"We have good security," she added. "We are very aware of the risks. But if people want to do this to my family how can you be 100 per cent sure you'll prevent it? If someone is that mad – that sick – what can you do?"

"I don't think this will really sink in for a while. I'm just so shocked."

David's father Ted Beckham said: "David's first thoughts will be for Victoria, but also for the safety of his two boys, especially for Romeo.

"Victoria and David both lead high profile lives, but you can never expect anything quite like this. There are some sick people in this world. I'm just so relieved that nothing terrible happened.

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"I'll be speaking to David as soon as possible to make sure they're OK. Until then, I'd rather not say any more."

Former Metropolitan Police Flying Squad Commander John O'Connor said last night: "Kidnap is a very unusual crime in this country and a plot against a celebrity is almost unheard of.

"Logistically, kidnap is a very difficult crime to carry out successfully. Not only do you have to look after the day-to-day needs of your victim but you have to keep your identity a secret from them.

"This was a serious plot to kidnap Victoria Beckham and I think the News of the World has carried out a wonderful piece of work. For an undercover reporter to get information and intelligence which can be passed on to police and leads to arrests is a great achievement.

"That's what a great investigative newspaper is all about."

The gang targeted Victoria not only because they thought they could get past her security but because of the vast wealth she shares with her husband.

Yesterday Manchester United and England hero David, 27, was named the country's highest earner under 30 and the best-paid footballer. His £15.5 million this year put him ahead of the Queen.

Victoria was at Old Trafford yesterday to see David play in the 2-1 win over Southampton. Victoria was told of the kidnap threat after the game began but did not tell her husband until full time.

[Photograph of Victoria and Romeo Beckham and another man]

OUT SHOPPING: *Victoria Beckham has to balance her security with freedom*

[photograph caption]

[page 7]

[Headline]

COURAGE OF OUR HERO MAZHER

Our Investigations Editor Mazher Mahmood put his life on the line to probe the kidnap gang. And during his time on the News of the World he has secured 119 convictions and exposed countless scandals. His famous cases include:

Exposing a Russian mafia marriage scam. Maz had the latest in a series of contracts put out on his life this March after revealing that Simon Kogan helped arrange bogus marriages to Russian brides at £7,000 a time.

Putting away paedophile Tony Valvona. After Mazher got hold of a video of Valvona abusing a girl, the beast sent shotgun killers after our man. Valvona was jailed in 1993.

Showing London's Burning star John Alford pushed cocaine. Alford got jail.

Investigating radio DJ Johnny Walker's drug habits. Walker was jailed for cocaine possession and ended up in rehab.

Catching Home Office official Shivan Sahonta selling fake passports in a racket that raked in over £500,000.

[Photograph of man and two armed police officers.]

COURAGE: Mazher at cop gunpoint yesterday

[photograph caption]

4. The NOW articles referred to the Claimant.

Particulars

4.1 As indicated above, the articles were illustrated with a photograph of the Claimant on page 4, under the caption "BABY-FACE: But Ali is the surveillance expert".

4.2 The Claimant was referred to as "Ali" throughout the articles. "Ali" is a shortening of the his first name "Alin", by which he is widely known.

~~4.3 The articles stated that the Claimant was 19 years old. [At the date of publication he was a month short of 19.~~

4.3 In consequence, the articles were widely understood to refer to the Claimant. Furthermore, it was reasonable for readers with knowledge of the above matters to understand the articles to refer to the Claimant.

5. The natural and ordinary meaning of the NOW articles is that the Claimant, as a member of an international terror gang, was on the brink of violently kidnapping Victoria Beckham and her two sons and demanding a £5 million ransom on her life, and was prepared to kill her if David Beckham did not pay the ransom.
6. In all editions of the issue of the *The Sun* of 4 November 2002 on pages 1, 4 and 5 the Defendant published the following words, photographs and captions ("the *Sun* articles") which are defamatory of the Claimant:

[Front Page article]

[Headline]

BECKS CALLS IN AN ARMY

Family's kidnap shield

Shaken David Beckham last night called in a crack security squad as thugs plotting to kidnap wife Victoria were seized.

England skipper Becks – who already has five ex-SAS men protecting him at a cost of £350,000 a year – is recruiting even more.

Becks, 27, is holed up with Victoria, 28, and their two children at their £1.2 million Cheshire farmhouse. Nine people were arrested after the News of the World infiltrated the gang and tipped off police.

[Photograph of David Beckham]

Guard... Becks arrives home yesterday

[photograph caption]

Full Story – Pages Four and Five

[pages 4 and 5]

[Headline]

The first role of a father is to keep his family safe – DAVID BECKHAM YESTERDAY

[Box Headline]

SECURITY BEEFED UP AFTER POSH KIDNAP PLOT

SHATTERED David Beckham made a vow to protect his family yesterday as he comforted wife Victoria over the chilling plot to kidnap her.

The England soccer skipper ordered a major review of security surrounding Posh and their two children, declaring: "The first role of a father and husband is to keep his family safe."

As detectives quizzed nine people over the amazing ransom plot, Becks said he was consulting with police and private security experts.

The family's team of five SAS minders is to be beefed up.

Grateful Becks, 27, paid tribute to the way the kidnap gang was foiled – after being infiltrated in a brilliant sting by undercover reporters from our sister paper the News of the World.

The Manchester United midfielder said: "I would like to thank the police for their professionalism and support yesterday. From the moment they received their information from the News of the World they were unbelievably effective. "Because of this incident we will be reviewing our security arrangements again with help from both the police and the security experts at Manchester United." He spoke in Manchester as a convoy of security vans arrived at his £2.5 million mansion in Sawbridgeworth, Herts.

Cameras

Technicians repeatedly double-checked the sprawling estate's 8ft electronic gates.

One worker from Ace Security and Electrical replaced a **DUMMY** alarm on the wall of the gatehouse with a real one.

The mansion in Herts already bristles with hi-tech security devices.

An intercom service goes directly to the butler in the gatehouse so any visitors can be fielded before access is granted.

Last year a two-acre spinney which borders the grounds was bought by Becks after it emerged it was being used as a vantage point to spy on the house.

Security cameras, both on the gates and hidden along the half-mile driveway, monitor the movements of anyone near or on the property.

Yesterday, Posh, Becks and their children were holed up at their other home, a £1.25 million converted barnhouse in Nether Alderley, Cheshire.

Police cordoned off the entrance and teams of security guards in suits and overcoats patrolled the grounds.

An onlooker said: "It looks like the sort of security that guards the presidents of the United States rather than a footballer's country home."

Becks ventured out just once – for a brief training session.

His Mum Sandra, 48, drove there on Saturday night. Victoria's mum Jackie, 53, arrived yesterday.

The families rallied round after the shocking news that the kidnap gang planned to **AMBUSH** Victoria, 28, as she drove out of the gates of the Sawbridgeworth mansion.

They had obtained a chloroform **KNOCKOUT** spray to use on the Spice Girl. Victoria was to have been driven to Brixton, South London, and held **CAPTIVE** in a soundproof cell until Becks paid £5 million.

One gang member allegedly said of the couple's children Brooklyn, three, and two-month-old Romeo: "If the kids are with her it's even better. But if something happens and he don't pay, Victoria is going to die."

Handcuffed

The plot was smashed on Saturday as the Eastern European gang – also said to have stolen a fortune in fine art from Sotheby's – met up in a hotel car park.

Cops with Heckler and Koch MP5 machine carbines burst from a van, screaming: "Armed police. Get on the floor." Three men of either Albanian or Romanian origin were spread-eagled then handcuffed.

At the same time armed officers arrested a couple at a fourth floor flat in Morden, South London. Later two more men were arrested – and overnight a couple were seized at an address in Croydon.

The News of the World identified five gang members as Luli Azem Krifsha, Joseph Rivas, Jay Sorin, a gunman named Adrian and baby-faced Ali, a surveillance expert.

All suspects were taken to central London police stations.

The Mafia-style gang stalked Victoria for weeks – both at Sawbridgeworth and in Nether Alderley.

They even followed her to the hairdresser.

Victoria was just about to watch Becks play at Old Trafford when she was told of the plot.

She kept the news from him until the final whistle of the 2-1 win against Southampton.

Victoria said: "It's terrifying to think somebody would want to do that to you and your children.

"We have good security and are aware of the risks. But how can you ever be 100 per cent sure you'll prevent it if someone is that mad?"

The Beckhams – worth £50 million – have been paranoid about security since a £1 million plot to kidnap Victoria and Brooklyn two years ago.

Scotland Yard rumbled it after kidnappers called a pal of Victoria's. No arrests were ever made.

In May 2000 Victoria received a defaced newspaper photo with a drawing of a bullet aimed at her.

She also suffered a blood-chilling scare during a Brit Awards performance when she thought she had been shot after receiving death threats.

Victoria clutched her stomach instinctively after hearing a series of bangs while performing on stage.

The former Spice Girl's nerves were on edge after she noticed a beam of light pointing at her chest as she left the stage – and feared it was cast by the laser sight of an assassin's gun.

Police found a fire door had been wedged open.

[Photograph of David, Victoria and Brooklyn Beckham]

Fears... Posh, Becks and Brooklyn

[photograph caption]

[Photograph of four men outside a house]

Inset: Gang seen casing the joint last week

[photograph caption]

[Photograph of a man walking into a house]

Tightened security... alarm man begins work at gatehouse to 'Posh and Becks' Hertfordshire mansion yesterday

[photograph caption]

[Photograph of two policemen, a police motorcycle rider and a police car]

Guard... police cordon at couple's Cheshire home yesterday

[photograph caption]

[Photograph of two men walking down a road]

Patrol... security men checking grounds at Nether Alderley

[photograph caption]

[Photographs of Jay Sorin, Joseph Rivas, Alin Turcu, Adrian Păsareanu and Luli Azem Krifsha]

GANG WHO WANTED £5M. *Caught on film... 'kidnap gang', from left: Jay, Joseph, Ali, Adrian and Luli*

[photograph caption]

7. The Sun articles referred to the Claimant.

Particulars

7.1 As indicated above, the articles were illustrated with a photograph of the Claimant on page 5.

7.2 The Claimant was referred to as "Ali" throughout the articles. "Ali" is a shortening of ~~the~~ his first name "Alin".

7.3 In consequence, the articles were widely understood to refer to the Claimant. Furthermore, it was reasonable for readers with knowledge of the above matters to understand the articles to refer to the Claimant.

8. The natural and ordinary meaning of the *Sun* articles is that the Claimant, as a member of an international terror gang, was on the brink of violently kidnapping Victoria Beckham and her two sons and demanding a £5 million ransom on her life, and was prepared to kill her if David Beckham did not pay the ransom.
9. In consequence the Claimant has been seriously defamed, hurt, and embarrassed.
10. The Claimant will rely on the following matters in relation to general or aggravated damages:-
 - 10.1 The prominence given to the NOW and *Sun* articles and the sensational manner in which they were published.
 - 10.2 The size and influence of the circulation of the NOW and *The Sun*, as the biggest selling Sunday and daily newspapers respectively.
 - 10.3 The gravity of the allegations.
 - 10.4 The massive hurt caused to the Claimant by the allegations.
 - 10.5 The republication of the defamatory sting of the articles elsewhere in the

national and international media which was either intended by the Defendant; alternatively such republication was a natural and probable and/or reasonably foreseeable consequence of the publication of the articles by the Defendant. For example, the kidnap story was the lead story in all the British national newspapers on 3 November 2002. This was primarily because of the sensational nature of the allegations and the publicity that was actively sought by the Defendant. Employees of the Defendant gave a large number of interviews to national and international broadcasters on 2 November 2002 and provided covert footage of the Claimant. A NOW article of 10 November 2002 entitled 'World Hails our Posh Plot Scoop' acknowledged the extent of the international coverage and the fact that this stemmed entirely from the NOW.

10.6 The repetition by the Defendant of the defamatory sting of the articles. The Claimants will rely on the following publications:-

- 10.6.1 'World Hails our Posh Plot Scoop' published in the NOW on 10 November 2002;
- 10.6.2 'Secret Weapon' published in the NOW on 16 February 2002;
- 10.6.3 A press statement entitled "*Statement from News of the World re Beckham case*" published by the Defendant on 2 June 2003;
- 10.6.4 'NOW: We stand by our Posh Plot story' published in *The Sun* on 3 June 2003;
- 10.6.5 'I'd Grown Up, But He Just Didn't Like What I'd Become' published in the NOW on 31 August 2003;
- 10.6.6 'Police told me a gang planned to kidnap Victoria and the children. I

felt my stomach turn-over' published in the NOW on 7 September 2003.

10.6.7 'Becks' guard killed in Iraq published in *The Sun* on 19 May 2004

10.6.8 'Posh's terror over ranting petrol nut' published in *The Sun* on 20 July 2004

10.6.9 'We win in court' published in the NOW on 8 May 2005

10.6.10 'Case of legal greed' published in the NOW on 8 May 2005

10.6.11 'Libel Bid is Closed' published in the NOW on 17 July 2005

10.6.12 'Maz The Master' published in the NOW on 4 September 2005

10.6.13 'Jordan babies target in £1m kidnap terror' published in the NOW on 14 May 2006

10.6.14 'Posh in Gun Drama' published in the NOW on 26 November 2006

- 10.7 Following the publication of the NOW articles the Claimant was arrested and held on remand at Feltham Young Offenders Institution, facing criminal prosecution, for approximately 8 months. The Claimant suffered acutely on remand due to the notoriety and seriousness of the defamatory allegations of which the Claimant complains. Following (and notwithstanding) the Claimant's release, the Defendant has persisted in alleging that the NOW articles were accurate. The Claimant refers to the publications set out in paragraph 10.6 above.
- 10.8 The Defendant has refused to make any apology to the Claimant and has consistently repeated statements to the effect that the allegations are true, both in public statements and ~~most recently in correspondence with the Claimant's lawyers in response to this claim~~ in the course of this action.

~~10.9 The conduct of Mazher Mahmood, the author of the NOW articles for whose actions the Defendant is vicariously liable:~~

~~10.9.1 Mr Mahmood knew or was indifferent to the fact that the alleged plot to kidnap Victoria Beckham and her children was a set-up with no evidential basis.~~

~~10.9.2 The sole source for the articles was Florian Gashi. Mr Gashi has criminal convictions for deception and was the cause of a botched NOW story about alleged criminal traffic attendants. As Mr Mahmood knew, Mr Gashi was in the business of providing the Defendant with news stories for financial gain. Mr Mahmood also knew or was indifferent to the fact that Mr Gashi's testimony could not be relied upon.~~

~~10.9.3 Mr Mahmood also knew that Mr Gashi was desperate to receive payment for a story. In the four weeks preceding publication of the NOW articles, he was seeking to sell a variety of potential stories to Mr Mahmood. Mr Mahmood rejected these stories because they were not of sufficient interest to the NOW. Mr Gashi then proposed a further story about a plot to kidnap a Saudi Arabian prince. Mr Mahmood was interested in this story but did not accept it for publication. It was only when Mr Gashi indicated that there was a plot to kidnap the Beckhams that Mr Mahmood indicated his strong interest. He instructed Mr Gashi to seek to obtain covert evidence and~~

~~directed him as to what evidence to obtain. On 1 November, two days before publication of the NOW articles, the Defendant raised a cheque for £10,000 payable to Mr Gashi, as payment for the articles.~~

~~10.0.4 The testimony of Mr Gashi was the only basis for the Defendant's claim that there was a plot to kidnap Victoria Beckham and her children that involved the Claimant. As was apparent, the covert recordings obtained by Mr Gashi provided no credible evidence of the Claimant's involvement in any alleged kidnap plot.~~

~~11 The Claimant claims exemplary damages.~~

~~Particulars~~

~~11.1 Paragraph 10.0 above is repeated.~~

~~11.2 In the circumstances, the Defendant knew that the Claimant was not a party to any plot to kidnap Victoria Beckham and her children or was indifferent to the truth of this allegation. The sole purpose driving the Defendant to publish the allegations complained of was to create a highly sensational story—a "world exclusive"—as it was described in the NOW on 3 November 2002. It is to be inferred that the Defendant, through Mazher Mahmood and the editor of the NOW Rebekah Wade and/or other employee(s) of the Defendant, responsible for the editorial decision to publish the allegations complained of, calculated that the financial benefit in terms of increased sales outweighed the risk of any damages~~

~~which might have to be paid to the Claimant, who it is to be inferred the Defendant regarded as a soft target, lacking the commitment or resources to sue the Defendant.~~

~~11.3 On 8 December 2002, the Defendant boasted in a NOW article, headed *We Serve Up Sales Success*, that circulation figures for November 2002 had increased by an average of 53,820 copies per issue as compared with November 2001. The article went on to claim that this was due in part to the Defendant's "brilliant exclusives, such as the Beckham kidnap plot". It is to be inferred that the Defendant published the allegations complained of with the intention of boosting circulation figures for the NOW and/or *The Sun*, and that they had the desired effect.~~

~~11.4 The jury will be asked to award a sufficient sum to deter the Defendant from engaging in such a cynical calculation in the future.~~

11 42 Unless restrained the Defendant will publish or cause to be published the same or similar libels of the Claimant.

And the Claimant claims:

1. Damages for libel including aggravated and exemplary damages.
2. An injunction restraining the Defendant from further publishing or causing or authorising to be published the same or similar libels of the Claimant.

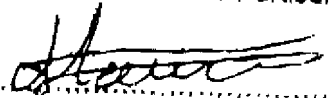
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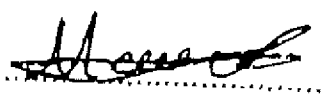
DAVID PRICE
DAVID PRICE
KORIEH DUODU

I believe that the facts stated in these Particulars of Claim are true.



ALIN TURCU

I believe that the facts stated in these Amended Particulars of Claim are true.



BOGDAN STEFAN MARIS

Served and filed on February 2004 by David Price Solicitors & Advocates, 21 Fleet Street, London EC4Y 1AA. Tel: 0207 353 9999, Fax: 0207 353 9990, email: enquiries@lawyers-media.com Ref:1331.DP/KD Solicitors for the Claimant

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IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
Claim Form Issued: 31 October 2003

CLAIM NUMBER: HQ03X03360

BETWEEN

ALIN TURCU BOGDAN STEFAN MARIS

Claimant

- and -

NEWS GROUP NEWSPAPERS LIMITED

Defendant

DRAFT AMENDED PARTICULARS OF
CLAIM

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