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The Rt. Hon. Lord Justice Leveson The Leveson Inquiry Royal Courts of Justice Strand London WC2A 2LL

Dear Judge

We represent the Rt. Hon. Gordon Brown, MP.

You heard evidence from Kelvin MacKenzie on Monday 9 January. His evidence, about an alleged call at the time of the Labour Party Conference of September 2009, was:

"That night a furious Brown called Murdoch and, in Rupert's words, 'roared at me for 20 minutes'.".

When asked the source for the story, Mr MacKenzie replied: "It was Mr Murdoch". His evidence was that:

"At the end, Brown said, 'You're trying to destroy me and my party. I will destroy you and your company'.".

The story is completely untrue. It is important that it does not become accepted as a fact. A respected national newspaper has already raised it as if it were a fact in the course of a PCC investigation of a complaint made by Mr Brown (which was upheld). Mr Brown has a clear recollection of the calls he had with Mr Murdoch when he was Prime Minister. He had no such conversation with Mr Murdoch at any time during the Conference. Thus, the words attributed to him by Mr MacKenzie were not said by him to Mr Murdoch, and the statement attributed to Mr Murdoch by Mr MacKenzie is factually wrong. The account is not an accurate reflection of events. Mr MacKenzie's hearsay statement was not tested as to its reliability or credibility in the Inquiry. Yet the press reported it, and that evidence, substantially - as fact. This story should not become an accepted account of the relationship between the press and politicians. And the incident provides an insight into the difficulties any individual faces in establishing a true and fair record of events.

Yours faithfully

Reed Smith

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