



Sales Promotion Specialists

Don Marketing UK Ltd.
St. Andrews Castle
33, St. Andrews Street South
Bury St. Edmunds IP33 3PH
Tel: 01284 388816
Fax: 01284 388308
E-mail: jad@don-marketing.com
Web: www.don-marketing.com

JAD/A171

Mr Colin Joseph
D J Freeman Solicitors
43 Fetter Lane
London
EC4A 1NA

2 July 1998
2 Pages By Fax Only To:
0171 556 4461

Dear Mr Joseph

Mr Woodman has supplied me with a copy of your letter of 1st July. PC Grant interviewed me at Bury St Edmunds Police Station. At the time of the interview, I was acting under the misapprehension that neither DJ Freeman, nor your client, could possibly be associated with underhand activity involving an undercover investigator. It seemed inconceivable that you would drag your firm and your client down into the gutter in that way, particularly when you were aware that Mr Moody-Stuart is being kept informed of developments.

If you had not concealed your knowledge of potentially important evidence, possibly relating to a serious criminal offence, an immediate investigation by the Police would almost certainly have ensued.

The receptionist who was interrogated by Mr Phillips during his clandestine mission only returned from her most recent holiday on Tuesday of this week. When I met her yesterday, she kindly provided typewritten notes from which a Statement will be prepared for her approval. As Mr Phillips may have mentioned, she caught him red-handed in the act of checking private mailboxes kept at the offices. It was this act, followed by his unsatisfactory explanation, and his pointed questions about DM, which aroused her suspicions.

When various parties, including a firm of investigators, have completed enquiries to confirm the extent of the clandestine activities, I will be reporting the matter to the OSS. I will however supply you in advance with a copy of the letter of complaint, so that you have the opportunity to point out any inaccuracies. I will also send the finalised dossier to the Chief Constable of Suffolk to request a full inquiry.

Progress in this serious matter could be speeded up given your genuine co-operation (instead of your deliberate concealment of information). Preliminary inquiries suggest that Mr Phillips actually works with a different firm of investigators – probably M.C. Investigations (not Cofton Consultants). In other words, “Cofton Consultants” was a “front” for an undercover mission. Kindly confirm whether this is correct.

If you decline to answer, we will take that as an admittance that Mr Phillips was engaged in a further subterfuge. It would explain why you always refer to "Mr Phillips", without ever mentioning "Cofton Consultants".

It would also assist if you could find out from Mr Phillips whether he or his associates, including Mr Payne, have any knowledge of Mr Charles Hoots?

Finally, I would point out that you had an opportunity to disassociate your firm and your client with the sleazy activities of Mr Phillips. You chose instead to claim that he has not acted improperly. Once again you are attempting to defend the indefensible.

Yours sincerely

John Donovan
Managing Director

cc. Mr Mark Moody-Stuart, Chairman, Shell Transport (Fax: 0171 934 7987)
Dr Fay, Chairman and Chief Executive, Shell UK Ltd (Fax: 0171 257 3939)
Mr Richard Wiseman, Legal Director, Shell UK Ltd (Fax: 0171 257 3303)
Mr Richard Woodman, Royds Treadwell Solicitors (Fax: 0171 583 2034)

SOLICITORS

43 Fetter Lane
London EC4A 1JU
Tel +44(0)171 583 4055
Fax +44(0)171 353 7377
DX103 London

Colin Joseph
Tony Leifer
Stephen Koehne
Toby Greenbury
Edward Torman
Jonathan Lewis
Marcus Rutherford
Paul Clark
Richard Spiller
Vivien Tyrell
Alan Magnus
Susan Hall
Anthony Edwards
David Coupe
Timothy Daniel
Christopher Comyn
David Kendall
James Innes
Alan Perry
Barbara Naftalin
David Johnson
Peter Taylor
Andrew Sanders
Maira Fraser
Christine Derrett
Sally Hine
Susan Aslan
Dorothy Cory-Wright
Clive Davies
Simon Corke
David Tiplady
Jane Moorman
Richard Hopley
Henry Clinton-Davis
Laurence Harris
Alexander Carter-Silk
Lesley-Anne Avis
Monica Blake
Caroline Janzen
Ashwani Kochhar
Richard Max
Susan Charles
Graham Chase
Mark Everiss
Elizabeth Goss
James Pilgrim-Morris
Ann Robson
Jonathan Martin

By fax and post

Direct line 0171 556 4411
Direct fax 0171 556 4590
Internet csj@djfreeman.co.uk

J Donovan Esq
Don Marketing UK Ltd
St Andrews Castle
33 St Andrews Street South
Bury St Edmunds
Suffolk
IP33 3PH

Your Ref **JAD**

Our Ref **CSJ/105457/JS**

3 July 1998

Dear Mr Donovan

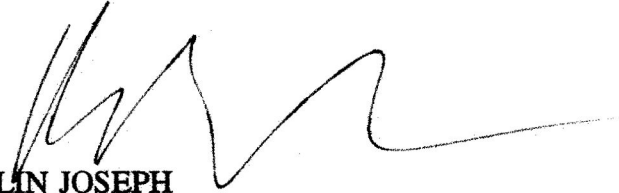
Shell Smart Card Consortium

Thank you for your letter of 2nd July.

You refer to our alleged concealment of "knowledge of potentially important evidence, possibly relating to a serious criminal offence". It seems to me that the only "serious criminal offence" that may have been committed relates to the threatening anonymous telephone call that you received. As I and my clients have already made plain, we have no knowledge of anything to do with that telephone call and it is not connected with any of the enquiries instituted by my client.

If, nevertheless, the police wish to obtain any further information from my clients or from anyone involved in enquiries on their behalf, including Mr Phillips, then, as has been said on several previous occasions, the fullest of co-operation will be given. If this matter is to be pursued then that is the obvious way for enquiries to proceed. My clients have nothing to fear from such enquiries.

Yours sincerely


COLIN JOSEPH

cc: **Royds Treadwell**

LB145310.1

Associate
John Skrimshire*

Consultants
David Freeman
Christopher Hancock
Mahir Jalili

* Non-solicitor
† US Attorney

The Partnership is regulated in the conduct of its investment business by the Law Society