



Osborne Clarke
One London Wall
London
EC2Y 5EB

31 August 2022

Sent by email: [REDACTED]

Dear Sirs

Nadhim Zahawi

Thank you for your email of 23 August 2022.

I note Nadhim Zahawi does not wish to comment on any of the specific points I raised, including that he misled Kay Burley/Sky News and the Guardian by wrongly denying he benefited from the trust. That is Mr Zahawi's right.

There are, however, several outstanding questions for Osborne Clarke (as opposed to Mr Zahawi) to answer:

1. You have not explained why your letter stated as fact that Balshore had provided £7,000 of capital in 2000, when there is now good reason to believe it did not. If you now accept your statement was probably wrong, when did you become aware of this?
2. You have not justified the claim in your letter of 19 July that it was confidential, and publication would be improper. These statements were without legal foundation. If you disagree, please explain what information in the letter should be regarded as confidential, and why you think the circumstances imported a duty of confidence on me.
3. You have not justified the claim in your email of 16 July that I was not entitled to publish or even refer to the email other than for the purposes of seeking legal advice, and that publication would be a “serious matter”. There is perhaps room for debate whether the letter was truly

“without prejudice” (although I believe it was not), but the claim that “without prejudice” correspondence cannot be published (or referred to), and that publication would be a “serious matter” is without legal foundation. If you disagree, please explain the legal basis for your view.

It is of course up to you whether you will justify or withdraw these statements and claims; however it is not open to you to ignore them. You will be aware that, as a matter of professional standards, a solicitor may not mislead third parties, either by their own acts or omissions, or by allowing or being complicit in the acts or omissions of others (including their client).

If you conclude that you must withdraw some or all of these statements and claims (as I believe you must) and Mr Zahawi does not permit you to withdraw them, then you should cease to act.

Yours faithfully



Dan Neidle