



Neutral Citation Number: [2023] EWHC 120 (KB)

Case No: QB-2021-001140

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
MEDIA AND COMMUNICATIONS LIST

Royal Courts of Justice
Strand, London, WC2A 2LL

Date: 26/01/2023

Before :

THE HON. MRS JUSTICE STEYN DBE

Between :

MURTAZA ALI SHAH

- and -

(1) MOHAMMAD IMRAN

(2) SHANAZ SADDIQUE

(3) RIAZ HUSSAIN

Claimant

Defendants

Jacob Dean (instructed by **Stone White Solicitors**) for the **Claimant**
The **Defendants** appeared in person

Hearing dates: 16 January 2023

Approved Judgment

This judgment was handed down remotely at 10.00am on 26 January 2023 by circulation to the parties or their representatives by e-mail and by release to the National Archives.

.....

THE HON. MRS JUSTICE STEYN DBE

Mrs Justice Steyn DBE:

A. Introduction

1. This claim for defamation arises from six publications, namely, (i) a petition which was first published by the First Defendant on the Change.org website on 30 March 2020 ('the Petition'); (ii) a video which was published by the First defendant on YouTube and Facebook on 31 March 2020 ('D1's First Video'); (iii) a video which was published by the First Defendant on YouTube and Facebook on 29 April 2020 ('D1's Second Video'); (iv) a Tweet published by the Second Defendant on 18 April 2020, quote tweeting Saif Chaudhury ('D2's first Tweet'); (v) a Tweet, also published by the Second defendant on 18 April 2020, quote tweeting Faisal Khwaja ('D2's second Tweet'); and (vi) a video which was published by the Third Defendant on Facebook on 20 April 2020 ('D3's video'). The Petition and two Tweets were in English; the three videos were in Urdu.
2. I have set out the publications or, in the case of the videos, the English translation of the transcripts of the publications, in the Appendix to this judgment.
3. The Claimant describes himself as a Pakistani journalist resident in London, and as the UK and Europe Bureau Chief for the Pakistani television channel Geo News and the Jang Group of newspapers. The Defendants describe themselves as political activists. At the time of the publications, the First, Second and Third Defendants held the positions, respectively, of President, General Secretary and Additional General Secretary in the North West UK regional chapter of Pakistan Tehreek-e-Insaaf ('PTI'), the political party which was led, at the time of the publications, by the (then) Prime Minister of Pakistan, Imran Khan.
4. This judgment follows a trial of three preliminary issues, identified in the order of Master Eastman dated 16 June 2022 in the following terms:
 - “(a) the meanings of each of the publications complained of;
 - (b) whether each of those meanings is a statement of fact or a statement of opinion; and
 - (c) whether each of those meanings is defamatory of the Claimant at common law.”
5. The Claimant was represented by Counsel, Mr Jacob Dean. The Defendants represented themselves. At their request, and with my permission, with Ms Saddique taking the leading role in making oral submissions on behalf of all three Defendants, supplemented by oral submissions made by Mr Imran, (at their request and with my permission).

6. I adopted the standard preparatory approach to the determination of meaning in a defamation claim of viewing/reading the material complained of, and forming a provisional view about its meaning, before considering the parties' pleaded cases and arguments about meaning.
7. As in *Shakil-ur-Rahman v ARY Network Limited* [2015] EWHC 2917 (QB), the task of forming an initial impression of the videos was made more challenging by the fact that they were broadcast in Urdu. The parties have agreed transcripts of the words spoken, and English translations of those transcripts. In this case, in respect of each video, I first watched it once through, to get an impression of genre and tone, and a clear view of the video images, then read the relevant translation, before watching the video again with the translation to hand, to get an overall impression of meaning. I have sought to avoid an over-literal approach but, as Haddon-Cave J observed in *Shakil-Ur-Rahman*, I have necessarily had to approach the task of ascertaining the meaning of the videos through the filters of, first, a transcript of what was said orally, and secondly, a translation of that transcript. I did not have the benefit of gaining the immediate impression which the words spoken would have had on the hypothetical viewer of the videos, who would have understood Urdu.

B. The Pleadings and Meaning Documents

8. The Claim Form was issued on 29 March 2021. Particulars of Claim were served on the Defendants on 19 July 2021. The Claimant has pleaded the meanings he relies on, and asserts that the statements complained of are statements of fact, and they are defamatory at common law.
9. On 3 September 2021, the Defendants filed a Defence. In the Defence, the Defendants denied the Claimant's meanings reflect the natural and ordinary meanings of the words complained of, but did not plead what the Defendants assert the meanings to be.
10. When setting down these preliminary issues for trial, by an order dated 16 June 2022, Master Eastman required each Defendant, not less than 28 days before the trial of the preliminary issues, to serve a document on the Claimant

“stating clearly, in relation to each of the publications complained of in the Particulars of Claim, the Defendant's case as to the following issues

a. the meaning which the Defendant contends the publication bears;

b. whether the Defendant contends that the publication contains an allegation of fact or an expression of opinion; and

whether the Defendant contends that the publication is or is not defamatory at common law.”

11. Each Defendant served a document but it is evident that they did not understand what was required of them and, consequently, those documents only partially comply with the order. In particular, the position remains that none of the Defendants have pleaded the meaning that they contend any of the publications bear, although they maintain their denial of the meanings pleaded by the Claimants. It is, however, clear that they contend the publications contain statements of opinion and that they are not defamatory at common law.
12. I sought to explore with the Defendants during the hearing the meanings that they contend the publications bear. However, to a large extent their submissions addressed matters such as what they had intended, what viewers/readers had *in fact* understood the publications to mean, and evidence of surrounding matters, all of which is inadmissible.

C. The Law

13. There was no dispute as to the law and the applicable principles are well established. Nevertheless, to assist the unrepresented Defendants, Mr Dean referred to the authorities I have set out below in some detail at the outset of the hearing.

Ascertainment of meaning - general principles

14. The Court's task is to determine the single natural and ordinary meaning of the words complained of. The focus is on what the hypothetical ordinary reasonable reader of the Petition and Tweets, or viewer of the videos, would consider the words to mean. That is the touchstone. The Court must avoid undertaking a lawyerly analysis.
15. The key principles derived from the authorities were helpfully distilled and restated by Nicklin J in *Koutsogiannis v Random House Group Ltd* [2019] EWHC 48 (QB), [2020] 4 WLR 25 at [12] (and approved by Warby LJ in *Millett v Corbyn* [2021] EWCA Civ 567, [2021] EMLR 19, [8]):

“i) The governing principle is reasonableness.

ii) The intention of the publisher is irrelevant.

iii) The hypothetical reasonable reader is not naïve but he is not unduly suspicious. He can read between the lines. He can read in an implication more readily than a lawyer and may indulge in a certain amount of loose thinking but he must be treated as being a man who is not avid for scandal and someone who does not, and should not, select one bad meaning where other non-defamatory meanings are available. A reader who always adopts a bad meaning where a less serious or non-defamatory meaning is available is not reasonable: s/he is avid for scandal. But always to adopt the less derogatory meaning would also be unreasonable: it would be naïve.

iv) Over-elaborate analysis should be avoided and the court should certainly not take a too literal approach to the task.

v) Consequently, a judge providing written reasons for conclusions on meaning should not fall into the trap of conducting too detailed an analysis of the various passages relied on by the respective parties.

vi) Any meaning that emerges as the produce of some strained, or forced, or utterly unreasonable interpretation should be rejected.

vii) It follows that it is not enough to say that by some person or another the words might be understood in a defamatory sense.

viii) The publication must be read as a whole, and any 'bane and antidote' taken together. Sometimes, the context will clothe the words in a more serious defamatory meaning (for example the classic "rogues' gallery" case). In other cases, the context will weaken (even extinguish altogether) the defamatory meaning that the words would bear if they were read in isolation (e.g. bane and antidote cases).

ix) In order to determine the natural and ordinary meaning of the statement of which the claimant complains, it is necessary to take into account the context in which it appeared and the mode of publication.

x) No evidence, beyond publication complained of, is admissible in determining the natural and ordinary meaning.

xi) The hypothetical reader is taken to be representative of those who would read the publication in question. The court can take judicial notice of facts which are common knowledge, but should beware of reliance on impressionistic assessments of the characteristics of a publication's readership.

xii) Judges should have regard to the impression the article has made upon them themselves in considering what impact it would have made on the hypothetical reasonable reader.

xiii) In determining the single meaning, the court is free to choose the correct meaning; it is not bound by the meanings advanced by the parties (save that it cannot

find a meaning that is more injurious than the claimant's pleaded meaning).”

16. It is also necessary to have regard to the “*repetition rule*”, namely, that “*where an allegation by a third party is repeated by the defendant, the words must be interpreted by reference to the underlying allegations of fact. Context nevertheless remains critical*”: *Koutsogiannis*, [15].
17. The observations of Saini J in *Ware v French* [2021] EWHC 384 (QB), regarding political speech, are also of relevance in this case:

“9. Leading Counsel for Mr French was right to submit that although political speech does not require special rules of interpretation, a political context nevertheless has an impact on the way in which the question of meaning must be approached. I accept that reasonable readers understand that political discourse is often passionate and is not as precise as, say, financial journalism. There is a particular need to avoid over-analysis when determining the meaning of political speech.”

Fact or opinion

18. As Nicklin J observed in *Koutsogiannis* at [16] (cited with approval in *Millett v Corbyn* at [12]):

“when determining whether the words complained of contain allegations of fact or opinion, the court will be guided by the following points:

(i) The statement must be recognisable as comment, as distinct from an imputation of fact.

(ii) Opinion is something which is or can reasonably be inferred to be a deduction, inference, conclusion, criticism, remark, observation etc.

(iii) The ultimate question is how the word would strike the ordinary reasonable reader. The subject matter and context of the words may be an important indicator of whether they are fact or opinion.

(iv) Some statements which are, by their nature and appearance opinion, are nevertheless treated as statements of fact where, for instance, the opinion implies that a claimant has done something but does not indicate what that something is, ie the statement is a bare comment.

(v) Whether an allegation that someone has acted ‘dishonestly’ or ‘criminally’ is an allegation of fact or expression of opinion will very much depend upon context. There is no fixed rule that a statement that someone has been dishonest must be treated as an allegation of fact.”

19. As Warby LJ observed in *Millett v Corbyn* at [17] when considering the defence of honest opinion:

“The statutory test refers to the ‘statement complained of’, not the meaning of that statement, or the imputation it conveys. It is common ground that for this reason the wording of the preliminary issue in this case was not quite right. But Mr Hudson accepts that the judge asked himself the right question: whether *the words used* were a statement of opinion or of fact.”

In this case, too, the second preliminary issue is not quite right, as it asks whether each of the *meanings* is a statement of fact or a statement of opinion. In determining whether each of the statements complained of was a statement of fact or opinion, I have focused on the words used rather than the single meanings that I have ascertained.

Defamatory at common law

20. The relevant common law test for whether a meaning is defamatory is uncontroversial. As recently summarised by Warby LJ in *Millett v Corbyn* at [9]:

“At common law, a meaning is defamatory and therefore actionable if it satisfies two requirements. The first, known as ‘the consensus requirement’, is that the meaning must be one that ‘tends to lower the claimant in the estimation of right-thinking people generally’. The judge has to determine ‘whether the behaviour or views that the offending statement attributes to a claimant are contrary to common, shared values of our society’: *Monroe v Hopkins* [2017] EWHC 433 (QB); [2017] 4 WLR 68 at [51]. The second requirement is known as the ‘threshold of seriousness’. To be defamatory, the imputation must be one that would tend to have a ‘substantially adverse effect’ on the way that people would treat the claimant: *Thornton v Telegraph Media Group* [2010] EWHC 1414 (QB); [2011] 1 WLR 1985 at [98] (Tugendhat J).”

D. The Petition

21. The Petition consists of a photograph of the Claimant at the top of the page, with words in Urdu superimposed over the photograph, followed by the text in

English. I have set out the text in paragraph 1 of the Appendix to this judgment, with paragraph numbers added for ease of reference. In the Particulars of Claim, the Claimant complains of all the words in English, that is, the whole of paragraphs 1, 2, 3 and 4. However, Mr Dean made clear that no complaint is made about the statement that he “*is biased*” ([2]), or that he is seeking to “*create a following that is anti Gov.of Pakistan*” ([2]), “*fuelling prejudice and hatred against Gov. of Pakistan*” ([3]) or that he is “*fighting for his boss Mr Shakil ur Rehman*” ([4]). In addition, he does not complain of the words in Urdu.

22. The Claimant’s pleaded meaning is:

“the Claimant has been misusing his position as a journalist by reporting news which he knows to be false and making allegations which he knows to be baseless for the purpose of misleading his audience and creating attention for himself.”

23. In support of this meaning, Mr Dean emphasises that the Petition is presented as an urgent call to action, from the capitalisation of the word “*STOP*” ([1]) to the exhortation that the Claimant “*must be stopped immediately*” ([3]). There is no equivocation in presenting the reasons for the call to action; no suggestion that this is one side of a story on which reasonable people could disagree. Instead a series of factual allegations about the Claimant are made, on the basis of which the reader is urged to sign the Petition. Mr Dean draws attention to the unequivocal language used, such as the words “*is misusing*” and “*has misused*” ([2]), and “*consists of allegations which are baseless*”.

24. Mr Dean submits that the pleaded meaning closely reflects the words used. In this regard, he draws attention to the allegation of misuse of his position which is made expressly three times (“*misuse of news reports*” ([1]), “*misusing these news platforms*” ([2]); “*misused his reporting*” ([2])); and reflected in the questioning of his “*professionalism*” as a “*reporter*” ([4]). The phrase “*false news*” is used twice, as well as the word “*baseless*” to describe his reporting. And the Petition states in terms that his purpose was to “*mislead and create personal attention*”.

25. Mr Dean acknowledges that the words “*which he knows to be*”, which appear in the Claimant’s meaning, do not appear in terms in the Petition. But he submits this would clearly be inferred by an ordinary, reasonable reader of the Petition as a whole. The Petition refers to the sole purpose being “*to mislead*” and refers twice to propaganda, while on the other hand there is nothing to suggest that the (alleged) Claimant’s reporting of false or baseless news is inadvertent or careless. He submits that the statement complained of was a statement of fact and that it was defamatory at common law.

26. Ms Saddique submitted that in the Petition the First Defendant was seeking to convey that this was a serious matter which, in his opinion, ought to be looked at by the Government of Pakistan. She said there was a history behind the Petition, of which an ordinary reader may or may not have been aware. The First Defendant was portraying not only his own opinion but that of others, too.

27. Although in their pleadings the Defendants had denied the meaning pleaded by the Claimant, during the course of the hearing Ms Saddique and Mr Imran submitted that they agreed with the meaning of the Petition pleaded at paragraph 7 of the Particulars of Claim (as set out in paragraph 22 above). However, they maintained that it was a statement of opinion and was not defamatory.
28. The view of the meaning that I had formed as a matter of first impression essentially corresponds to the Claimant's meaning, broadly for the reasons outlined by Mr Dean which I have summarised above; and, in circumstances where the Defendants agreed with that meaning in their oral submissions, I conclude that the meaning of the Petition is:

The Claimant has been misusing his position as a journalist by reporting news which he knows to be false and making allegations which he knows to be baseless with the aim of misleading his audience and garnering attention.

29. In my judgment, the words in italics reflect a statement of opinion as to the Claimant's purpose and as to how his conduct should be characterised. These would strike the ordinary, reasonable reader as deductions from the (wholly unequivocal) statement of fact that the Claimant has knowingly been reporting false news and baseless allegations.
30. In my judgment, the statement is defamatory at common law. I agree with the Claimant that an unequivocal allegation that a journalist has knowingly publish false or baseless reports strikes at the heart of their professionalism, and undoubtedly meets both the consensus requirement and the threshold of seriousness. The statement of opinion that he has been misusing his professional position for his own purposes also meets those requirements. These are serious allegations to make against a professional journalist.

E. D1's First Video

31. D1's First Video was posted on YouTube and Facebook. I have set out the agreed translation of the transcript of D1's First Video, with paragraph numbers added for ease of reference, in paragraph 2 of the Appendix to this judgment.
- i) On YouTube, immediately below the video, the following words appear in English:
- “Please sign this petition to stop [link to the Petition]”
- Immediately below those words, the words of the Petition are set out in Urdu.
- ii) On Facebook, above the video, the following words appear in English:
- “Please sign this petition to stop negative reporting [link to the petition]”

Immediately below those words, and immediately above the video, the words of the Petition follow in Urdu.

32. The words selected for complaint by the Claimant are those shown underlined in §§3, 4, 6, 7, 11, 12, 13, 14, 16, 17, 18 and 20, together with §§1-4 of the Petition.
33. The video lasts 9 minutes 32 seconds. The visual format remains largely the same throughout, with the viewer watching and listening to the First Defendant as he speaks directly to the camera in Urdu, with a wallpapered wall in the background. Nearly 4 minutes into the video, the screen changes to show a tweet in Urdu (other than the words “aggressive testing” and “isolate” which appear in English) and a tweet in English, while in a voiceover the words at §9 of the translation are spoken in Urdu. While the voiceover moves onto the words at §10 of the translation, a photograph appears on one side of the screen of Imran Khan and another man, with the words “FRAUD” (in English) superimposed, and next to it there is a photograph of the Claimant holding a microphone, superimposed over a photograph of a hand holding US dollars. There are words in English above the photograph (which do not fully fit onto the screen) referring to a “*million scam in Saqib Nisar’s Dam UK campaign*”, and other words below the photographs in Urdu. Further tweets are shown in a combination of English and Urdu, while the voiceover continues, and then the visual image returns to the First Defendant speaking directly to camera. While speaking the words at §8 of the translation, the image cuts to the First Defendant standing up rather than sitting, against the same background as before. He continues speaking directly to camera until the end of the video. The general impression conveyed is that the First Defendant is speaking calmly about a matter that he considers serious and important.
34. In the Particulars of Claim, the Claimant has pleaded both a meaning for the video alone and a meaning for the video coupled with the Petition. However, Mr Dean submits the publication must be taken as a whole, which in this instance means considering the Petition and the video together, as the text of the Petition appears in Urdu on the social media page immediately above or below the video. The Claimant’s pleaded meaning is:

“the Claimant has been misusing his position as a journalist by reporting news which he knows to be false and making allegations which he knows to be baseless for the purpose of misleading his audience and creating attention for himself and had been engaged in a filthy campaign of reporting fake news which he knew had no basis in reality, including the reporting of distorted facts and shockingly baseless claims, in breach of the rules of the UK media watchdog Ofcom, and by reason of which he deserved to be exposed, especially in the UK, and action taken against his employers by the Pakistani government.”

35. The first four lines of the Claimant's pleaded meaning are identical to the meaning put forward by the Claimant in respect of the Petition. In respect of the video, Mr Dean submits the following features would strike the viewer:
- i) The First Defendant's tone is measured and his manner is respectful and restrained. The viewer is left in no doubt that what they are being told is serious and important, a point which is emphasised by his references to his duty ([2] and [7]), and to the importance of exposing the Claimant ([11]).
 - ii) The word "*expose*" is used repeatedly ([6], [11] (twice), 12 [twice], [17] and [18]), and the need to expose the Claimant in the UK is emphasised ([6], [7] and [16]). The reference to Ofcom is not a suggestion that there are merely grounds to investigate: the clear impression is given that the Claimant has broke the rules.
 - iii) The tone and language contribute to the impression that the viewer is being appraised of matters of fact, an impression which is reinforced by the examples given.
 - iv) The pleaded meaning closely tracks the words used, e.g. "*filthy campaign*" ([10] and [11]), "*fake news*" ([7] and [17]), "*no basis in reality*" ([17]), and "*fact distortion*".
 - v) As with the Petition, the Claimant submits that the allegation of knowledge can be inferred.
36. Mr Imran took issue with the part of the meaning in which the words "*engaged in a filthy campaign*" are used, but otherwise he agreed with the Claimant's pleaded meaning. He said he was expressing an opinion. He gave evidence for the allegations that he made and, for example, expressed an opinion that the Claimant should be referred to Ofcom and action should be taken against his employers by the Pakistan government.
37. In my judgment, taking the publication of the video and the Petition as a whole, and applying the principles I have outlined above, the natural and ordinary meaning of the words complained of is:
- The Claimant has consistently, over many years, engaged in reporting negative news about Pakistan which he knows to be false, including the reporting of distorted facts and shockingly baseless claims, with the aim of misleading his audience and garnering attention. In doing so, he has misused his position as a journalist, in breach of the rules of the UK media watchdog Ofcom, and it is high time his false reporting is exposed and stopped, and action taken against his employers by the government of Pakistan.
38. This essentially reflects the meaning I perceived as a matter of first impression. This meaning is largely consistent with the Claimant's meaning. In the video,

together with the Petition, the clear message is given that the Claimant has knowingly engaged in reporting false news and baseless stories, and the First Defendant conveys the impression that the extent to which his writing is divorced from reality is shocking. For example, in the video he refers to “*fake news*” ([7] and [17]), “*false info*” [9], “*fact distortion*” [7], “*such baseless things ... you will hold your head in bewilderment*” [4]); an impression which is reinforced by the Petition. The First Defendant repeatedly expresses his concern that the Claimant is reporting negatively about Pakistan ([3] (twice), [7], [17], [20]). Although the terms “*filthy campaign*” and “*campaign*” are used more than once, in my view, the main impression given to a viewer watching the video once would be that the Claimant had been reporting in this way for years, a point emphasised by the First Defendant at the outset ([3]) and which is consistent with the call to report and expose him.

39. In my judgment, the combination of the video and the Petition is a statement of opinion. The message is clearly conveyed that the First Defendant is a political supporter of the government of Pakistan, and of the Prime Minister, and he is deeply concerned about the stream of negative reporting. Although the First Defendant expresses himself in unequivocal terms, it would strike the ordinary, reasonable viewer that his conclusion that the Claimant has engaged in false reporting is a deduction drawn from the Claimant’s tweets and his Facebook account, to which the First Defendant refers the viewer. The First Defendant provides examples, which the hypothetical viewer would assume are among the best examples, giving the viewer an opportunity to consider whether the First Defendant’s characterisation of the Claimant’s reporting is fair and accurate. The First Defendant’s statements that the Claimant has misused his position, that he should be reported to Ofcom, and that action should be taken against his employer by the government of Pakistan, would all strike the ordinary, reasonable viewer as the First Defendant’s opinion, based on his view of the Claimant’s reporting.
40. The assertion that the Claimant has engaged in reporting “*negative*” news about Pakistan is not defamatory, but the remainder of the meaning is defamatory at common law. These are serious allegations to make against a professional journalist. The seriousness is emphasised by the First Defendant’s call to action in terms of the Petition, the need to report the Claimant to Ofcom, and the suggestion that the government of Pakistan should take action against the Claimant’s employer.

F. D1’s Second Video

41. I have set out the agreed translation of the transcript of D1’s Second Video, with paragraph numbers added for ease of reference, in paragraph 3 of the Appendix to this judgment. The words selected for complaint by the Claimant are those shown underlined in §§1, 2 and 6.
42. The video lasts 12 minutes 39 seconds. The visual format remains the same throughout, with the viewer watching and listening to the First Defendant as he speaks directly to the camera in Urdu, whilst sat at a table with a wallpapered wall in the background. The general impression conveyed is, again, that the First

Defendant is speaking calmly about a matter that he considers serious and important.

43. In the Particulars of Claim, the Claimant's pleaded meaning at paragraph 19 was that "*the Claimant had knowingly manipulated his reporting so as to distort facts, including publishing a video which contained many lies*". However, that meaning was based on an earlier translation of the transcript. In light of the agreed translation, the meaning now put forward by the Claimant is:

"the Claimant had knowingly distorted the facts in his reporting, including publishing a video with others which contained many lies."

44. Mr Dean submits that by declaring that there was "*good news*" that the Claimant had done "*completely factual reporting*" over the last two weeks ([1]), the First Defendant was drawing a contrast with his earlier reporting. That message continues with the First Defendant admonishing the Claimant, "*Do not distort the facts*" ([2]), from which it would be inferred that was what he had been doing prior to the last fortnight. Mr Dean contends that it is a clear allegation of knowing distortion, as there is no suggestion that the Claimant was being criticised for some action of incompetence or negligence. In [6], Mr Dean submits the allegation of publishing a video which contained many lies comes in. The natural reading of "*they*", in context, is that the Claimant made the video along with the other journalists. He also relies on the repeated references in [7] to "*all of them*", and on the words "*you all ganged up*" [13], as supporting the understanding that the Claimant made the video with others.
45. Mr Imran submitted that in saying there was "*good news*" he was referring to the period between his First Video and this Video, and expressing an opinion that the reporting had been realistic. He had previously criticised the Claimant's journalistic work, and was now saying there had been recent examples of factual reporting. He submitted that his reference to a meeting was to one that the Claimant had convened, which had been live-streamed, during which they had discussed his First Video. Mr Imran rejected the Claimant's meaning, but his key reason for doing so was that the Claimant had not made a video. This was one of a number of occasions where the Defendants sought to introduce inadmissible extraneous material to explain the meaning of the publication.
46. In my judgment, the meanings of the words complained of are:
- (1) Until very recently, the Claimant's reporting unfairly distorted the facts.
 - (2) The Claimant issued a video report with other journalists, criticising the First Defendant, which report contained many lies.
47. I agree with the Claimant that a contrast is clearly drawn between the factual reporting of the last two weeks and prior reporting. A viewer would understand that the First Defendant was criticising the earlier reporting as unfair (and so the Claimant was urged to "*do fair criticism*") by reason of having distorted the

facts (and so the Claimant was urged “*Do not distort the facts*”). However, I do not accept that an ordinary, reasonable viewer would infer that the Claimant had *knowingly* distorted the facts. The impression given is that the Claimant’s reporting had been critical of the Prime Minister of Pakistan, and it had unfairly overstepped the mark by distorting the facts, but that since the First Defendant had expressed his concerns the Claimant had been more careful to ensure his reporting was fair and accurate.

48. In relation to the “*video*”, the First Defendant referred to it as a “*video*”, then appeared to correct himself to refer to a “*report*”, before referring again to “*those videos*” ([6]). Taking the publication as a whole, the impression given is that the Claimant, together with other journalists, issued some form of video report criticising the First Defendant, and their report contained “*many lies*”, of which no details are given.
49. Meaning (1) is a statement of opinion. That part of the statement complained of would strike an ordinary, reasonable viewer as being the view of someone who described himself as a political activist about reporting which he regarded as unfairly and inaccurately critical of the political leader he supported.
50. Meaning (2) is a statement of fact. The statement that such a video report was issued by the Claimant and others is, clearly, a factual statement. The assertion that it contained many lies is a bare comment and, as such, it too is a statement of fact.
51. In my judgment, the consensus requirement is met in relation to both meanings (1) and (2). The behaviours described, first, as a journalist, unfairly distorting facts, and secondly, lying repeatedly in a report, are contrary to common, shared values of our society. Although meaning (1) is a statement of opinion, on balance, I consider that it meets the threshold of seriousness, given the serious allegation that a journalist has distorted facts in his reporting. I also consider that the allegation of joining with other journalists to lie repeatedly in a video report meets the threshold of seriousness. Accordingly, I conclude that both meanings are defamatory at common law.

G. D2’s First and Second Tweets

52. I have set out the words of the two Tweets in paragraphs 4 and 5 of the Appendix to this judgment. The Claimants complains of the whole of each tweet. In respect of both tweets, the Claimant’s pleaded meaning is that:

“the Claimant was a corrupt journalist.”
53. The Claimant’s case, in respect of both Tweets, that a substantial number of readers would have understood them to be referring to the Claimant is not an issue which falls for decision at this stage. As Mr Dean invited me to do, I have determined the meanings without determining the extent to which readers would have understood the tweets referred to the Claimant.
54. In respect of D2’s First Tweet, Mr Dean relies on the words of Mr Chaudhury’s tweet as republished by the Second Defendant, together with her words of

thanks to him and use of a thumbs up emoji. In respect of D2's Second Tweet, Mr Dean relies on the words of Mr Khwaja's tweet as republished by the Second Defendant, again together with her words of thanks to him and use of a thumbs up emoji.

55. Ms Saddique submitted that her intention was simply to share the Petition and support her colleague. The tweets of Mr Chaudhary and Mr Khwaja that she quote-tweeted are simply the opinions of others. She said that she did not say the Claimant was a corrupt journalist, she merely shared the opinions expressed by others. Her submissions ignored the repetition rule (see paragraph 16 above) and trespassed into giving inadmissible evidence.
56. In my judgment, the meaning of each of the Tweets (subject to the reference issue) is that:

The Claimant is a corrupt journalist.

57. This meaning comes through clearly to the reader of Mr Chaudhury's message referring to the need to "*expose corrupt journalists*" and telling the Claimant he "*must stop corrupt journalism*". In the First Tweet, the Second Defendant endorses the message by republishing it, thanking Mr Chaudhury and giving an approving "*thumbs up*". It is also the meaning that comes through to the reader of Mr Khwaja's message, referring to "*corrupt*" media people who should be "kicked out" of journalism. In the Second Tweet, the Second Defendant again endorses the message by republishing it, thanking Mr Khwaja and giving an approving "*thumbs up*".
58. In my view, both Tweets are statements of opinion. Although the allegation that the Claimant is corrupt appears to be a bare comment, the ordinary, reasonable reader would appreciate that it is an opinion based on the Claimant's reporting (as reflected in the focus in both messages that were quote-tweeted on "*journalism*").
59. It is obviously defamatory at common law to describe a journalist as corrupt.

H. D3's Video

60. I have set out the agreed translation of the transcript of D3's Video, with paragraph numbers added for ease of reference, in paragraph 6 of the Appendix to this judgment. The words selected for complaint by the Claimant are those shown underlined in §§2, 3, 4 and 5.
61. D3's video was posted on Facebook and immediately below the video there is a link to the Petition. The video lasts 5 minutes 35 seconds. For the duration of the video, superimposed above the screen words appear in Urdu, the agreed translation of which is "*Stop doing negative journalism, for God's sake support truth Murtaza – stop misguiding people*". The video takes the form of a head and shoulders shot of the Third Defendant speaking directly to the camera. After about three minutes, the screen splits to continue to show the Third Defendant speaking on one side while showing a photograph of the Claimant on the other side, with words in Urdu superimposed over the photograph which translate as

“*Murtaza stop misleading people*”. The image of the Third Defendant speaking to camera and the photograph of the Claimant is briefly replaced with images in Urdu and English of the Petition. The last 30 seconds of the video consist of a song playing while the camera pans upwards to show a photograph of Imran Khan with the flag of Pakistan flying behind him. The general impression conveyed is that the Third Defendant is speaking calmly about a matter that he considers serious and important.

62. The Claimant has pleaded that the meaning of D3’s Video (including associated text and images published with it) is that:

“the Claimant had been knowingly misleading people through his journalism and is corrupt and a traitor to his home country of Pakistan.”

63. In addition, the Claimant has pleaded the following meaning in respect of D3’s Video coupled with the Petition:

“the Claimant had been knowingly misleading people through his journalism and is corrupt and a traitor to his home country of Pakistan and had been misusing his position as a journalist by reporting news which he knows to be false and making allegations which he knows to be baseless for the purpose of misleading his audience and creating attention for himself.”

64. Mr Dean submits that as there was a link to the Petition on the Facebook page, it may be necessary when considering the issue of serious harm to consider how many viewers would have clicked on the link to read the Petition. Accordingly, he asks me to determine the meaning of the D3’s Video separately and, alternatively, when viewed together with the Petition.

65. Mr Dean submits that in the video the Third Defendant speaks calmly and directly, conveying the seriousness of his message, which he describes in terms as “*very important*”, while disavowing any overtly political approach ([1]). The Claimant is introduced as “*a journalist in London*” ([4]). But the Claimant’s name appears throughout the video in the message above the screen (see paragraph 61 above), and for a significant portion of the video his face is shown along with the words “*stop misleading people*”. Those words are reflected in the first part of the pleaded meaning of the video. Mr Dean submits that the request to the Claimant to stop what he is doing carries the clear implication that his actions are deliberate and knowing; there is no hint of any allegation of carelessness or recklessness in his reporting.

66. Mr Dean derives the second part of the pleaded meaning of the video from words in [3]. As he acknowledges, general allegations are made in [3] that there are those “*who have done much corruption*” who “*if they are not traitors then what else are they?*” Amongst other things it is said that these people “*target the army*” and “*target Imran Khan*”. Those words are spoken by the Third Defendant while the Claimant’s name appears in the text above the screen, and immediately after they are spoken the Claimant is named orally. Mr Dean

submits that it is clear that the Claimant was being held up as an example of those “*who have done much corruption*”, which is made plain to the viewer by the allegation that the Claimant “*tries somehow to target the army, targets Imran Khan*” ([4]). The seriousness of the Claimant’s alleged conduct is brought home to the viewer by the words in [5], particularly the Third Defendant’s statement that “*we will expose you and show you your worth*”. The allegation of being a traitor is reinforced by the words “*If anyone so much as looks at Pakistan with an evil eye*” and the allegation against the Claimant that “*what you are doing is harming Pakistan*” ([5]).

67. Mr Dean contends that, in context, these would be understood as allegations of fact, and are plainly seriously defamatory of the Claimant, particularly in his position as a journalist.
68. Ms Saddique submitted that the Third Defendant, as a political worker, was making reference to an array of people working in various sectors, who were doing the things that he describes. He was expressing an opinion that they should not be biased as that can have dire consequences. Ms Saddique said it was wrong to infer that everything the Third Defendant said was referring to the Claimant. He was not referring to the Claimant when he referred to “*people doing such activities*” as “*traitors*”; he was referring in general to people who hold influence in Pakistan, and he did not link what he was saying in [3] to the Petition.
69. In my judgment, the meaning of the words complained of in D3’s Video is:

The Claimant is corrupt and has been harming Pakistan by knowingly misleading people through his journalism.

When coupled with the Petition, the meaning of D3’s Video is:

The Claimant is corrupt and has been harming Pakistan, and misusing his position as a journalist, by reporting news which he knows to be false and making allegations which he knows to be baseless with the aim of misleading his audience and garnering attention.

70. In my view, the ordinary, reasonable reader would readily infer that when the Third Claimant spoke of those “*who have done much corruption*” (in [3]) he was including the Claimant amongst those people. That would have been evident from (i) the express reference to the Claimant above the screen throughout the video, indicating this was about him; (ii) the reference to the Claimant by name immediately after speaking about those “*who have done much corruption*”; (iii) the reference to the Claimant targeting the army and Imran Khan which directly mirrored what the Third Defendant had said about those who he was referring to in more general terms immediately before.
71. The meaning that the Claimant has been misleading people through his journalism would be apparent to a viewer from the words the Third Defendant used orally together with the words that appear above the screen (“*...Murtaza stop misguiding people*”) and superimposed over the photograph of the

Claimant (“*stop misleading people*”). The fact that the assertion is of *knowingly* misleading people would be inferred by the ordinary, reasonable reader because the acts of the Claimant are described in deliberate and purposeful terms (e.g. “*tries to*”, “*targets*”, “*to save his bosses*”), the need to stop and restrain him is stressed, and because there is nothing to suggest that any misleading had been careless.

72. In my view, the italicised words reflect statements of opinion. Despite the terms in which the Third Defendant spoke at the beginning of his video, it would be evident to an ordinary reasonable viewer that he is a political activist who is supportive of PTI and Imran Khan, and expressing critical views of their opponents. The breadth of the statement regarding the people, including the Claimant, he considers corrupt is indicative that it is a statement of opinion, and it can be inferred that the basis of the allegation that the Claimant is corrupt is the content of his journalism. His view that the Claimant (and others) are harming Pakistan by their actions would also strike the viewer as a statement of opinion. Whereas the assertions of knowingly reporting false news, baseless allegations and knowingly misleading through his journalism were expressed as bald statements of fact rather than opinion. The basis for those assertions would not be apparent to the hypothetical viewer from the video or the Petition.
73. The meanings are clearly defamatory at common law.

I. Conclusions

74. In my judgment, the natural and ordinary meanings of the words complained of are:
- i) **The Petition:** *The Claimant has been misusing his position as a journalist by reporting news which he knows to be false and making allegations which he knows to be baseless with the aim of misleading his audience and garnering attention.*
 - ii) **D1’s First Video (coupled with the Petition):** *The Claimant has consistently, over many years, engaged in reporting negative news about Pakistan which he knows to be false, including the reporting of distorted facts and shockingly baseless claims, with the aim of misleading his audience and garnering attention. In doing so, he has misused his position as a journalist, in breach of the rules of the UK media watchdog Ofcom, and it is high time his false reporting is exposed and stopped, and action taken against his employers by the government of Pakistan.*
 - iii) **D1’s Second Video:** (1) *Until very recently, the Claimant’s reporting unfairly distorted the facts.* (2) *The Claimant issued a video report with other journalists, criticising the First Defendant, which report contained many lies.*
 - iv) **D2’s First Tweet:** *The Claimant is a corrupt journalist.*

- v) **D2's Second Tweet:** *The Claimant is a corrupt journalist.*
- vi) **D3's Video:** *The Claimant is corrupt and has been harming Pakistan by knowingly misleading people through his journalism; **D3's video (coupled with the Petition):** *The Claimant is corrupt and has been harming Pakistan, and misusing his position as a journalist, by reporting news which he knows to be false and making allegations which he knows to be baseless with the aim of misleading his audience and garnering attention.**
75. The parts of the meanings shown in italics in §74 above are statements of opinion; and they are otherwise statements of fact.
76. The meanings are all defamatory at common law, save for the word shown underlined.

Appendix

1. The Petition

Photograph of the Claimant with words superimposed in Urdu, the English translation of which is “*Murtaza! Stop misleading the people*”

“[1] This petition is created to STOP misuse of news reports against Gov.of Pakistan, led by PM Imran khan.

[2] Murtaza Ali Shah a self proclaimed UK reporter for GEO NEWS, Daily Jang & The News(head office in Pakistan)is misusing these news platforms to propagate damaging propaganda & false news from a personal agenda. He is biased & uses language which misrepresents/distorts events and fuels false news.The propaganda led reporting consists of accusations which are baseless, cannot be proven & for the sole purpose to mislead and create personal attention. He has misused his reporting titles /position to manipulate & create a following that is anti Gov.of Pakistan,;evidenced on Facebook & Twitter.

[3] We the undersigned ask the Gov.of Pakistan to take action against Murtaza Ali Shah, reporter for GEO NEWS, Daily Jang & The News(head office in Pakistan). He is fuelling prejudices & hatred against Gov.of Pakistan. This is causing distress to all overseas Pakistanis & must be stopped immediately.

[4] In signing this petition ask yourself about the professionalism of this reporter. The world is focussed on fighting Corona-19 this reporter is fighting for his boss Mr Shakil ur Rehman.”

(The numbers in square brackets have been added. The words complained of, as identified in the Claimant’s written and oral submissions, are shown underlined.)

2. D1’s First Video (English translation of words spoken in Urdu)

“Asalam o Alaikum

[1] I hope you are well and those who are sick of Coronavirus I pray to Allah that he gives them good health and Allah keeps everyone in his domain. This video of mine is related to the video I made regarding the media before. This is a continuation. Continuation because throughout there are some so-called anchors and Pakistani media who are not stopping from doing agenda-driven programs. Through their reporters and different correspondents, some media houses are involved in a campaign against the government in Pakistan and especially Prime Minister Imran Khan.

[2] That's why I thought it's important for me as a political worker and as an overseas Pakistani that I should fulfil my duty.

[3] I live in the UK and here there is a media house who has a correspondent who is London based. His name is Murtaza Ali Shah. He is constantly, throughout last many years, taking out or creating negative reports surrounding the government and Imran Khan and particular, especially since the PT formed govt in Pakistan. In particular, he makes negative news out of statements of Imran Khan.

[4] Look at his tweets and look at his Facebook. You will see such baseless things on that, that you will hold your head in bewilderment.

[5] Look, reporting and media should report what is wrong as wrong is wrong and we all call it wrong. Mr Imran Khan himself said in his press conference that if anything is wrong and if you bring it forward, based on facts, then he himself would take action on it. And all of us also say that don't run this campaign. Especially Murtaza Ali Shah, these days when the world is worried about coronavirus and crying about it, this Murtaza Ali Shah and all of Geo's representatives and anchors in Pakistan are crying after their boss Mir Shakil ur Rehman.

[6] Due to this reason, I have taken all of his tweets, his Facebook, his reporting and after taking advice from my friends and my team I have decided that it's time to expose Murtaza Ali Shah, especially in the UK.

[7] Here in the UK in my opinion, till today, straight or not, lie or truth, I don't think his fact distortion and fake news publication hasn't been challenged. It is our duty to do so because we love Pakistan and he (Murtaza Ali Shah) has made our life painful by running negative news continuously and it seems that there is no good news in Pakistan.

[8] I'll give you a few examples of his tweets.

[9] First of all you see this, Faisal Edhi released a video which was tweeted from an account that said Edhi foundation was getting 6-7 suspected dead bodies of coronavirus victims every day, when translated it says suspected. Murtaza Ali Shah liked it and tweeted it from his account but deleted the word suspected. This means he announced that these are the numbers of patients dying in Punjab. Look at the level of his negativity. You can see how he has changed the entire direction of the video, if this isn't false info then what is?

[10] Now look at this, this is Prime Minister Imran Khan's picture and he has written the word 'fraud' in front of it. I request all PTI workers and everybody that only if Imran Khan is there then we am there and have positions. This is a filthy campaign against Imran Khan. You see this, he is linking dam fund with Imran

Khan. Then He (Murtaza) is worried about Mir Shakil ur Rehman. He's doing everything in favour of Nawaz Sharif and Maryam Nawaz Sharif with the rest of his Geo colleagues.

[11] This whole campaign you can see, (Selected, not elected in Tweet). So we have to expose his filthy campaign and all of you please help us. Due to these things, it has become important to expose him.

[12] To expose him we will use social media and secondly, we have created a petition that will be shared with everyone especially those in the UK and especially overseas Pakistanis that if you love Pakistan in the name of Allah - and I know that you do – and its my belief that we have to expose this kind of man and there are many people like him whom we have to expose.

[13] So my request is that share this petition, share it with the whole world, as much as you can. Do sign on it. Similarly, there is a text in English which you can see with the link of the petition but there is also an Urdu translation which will also be provided in the petition to be shared so those who read Urdu can also understand that what this petition is about.

[14] In this petition we have asked Pakistan government, because Geo's head office is in Pakistan and this man (Murtaza) claims to be a representative of Geo and he is, he reports from here. So the Pakistan govt should take action against Geo. They should ensure that he does not do this kind of reporting. He should be restrained. The Pakistani govt should take full action against this through the relevant organisations.

[15] And then Murtaza Ali Shah has done tweets/messages from his account against Pakistani constitutional institutions like NAB that I ask God for forgiveness.

[16] So we should stop this. And the second thing is, Ofcom in the UK which is a watchdog of media, should be sent an official complaint about Murtaza Ali Shah and his reporting and it will be sent after our petition.

[17] What we have to try to do is to expose him. There is no personal agenda in this; anyone can do anything to me. I am a nobody. They can do whatever, I don't care. But you are creating Pakistan's image in such a way, creating such a negative image of Pakistan and doing fake news reporting which has no basis in reality. That is a very sad situation.

[18] I plead you all once again, please share this petition with maximum people and expose this kind of people. This petition will be an electronic petition. You just need to do one or two clicks and your support will reach us.

[19] And secondly, look; Mir Shakil ur Rehman (MSR) is not important for us. You work for him, you can support him in whatever manner you want but don't damage Pakistan because of him. You have made MSR like a figure as if he controls the world, or that God forbid, Pakistan will be destroyed if MSR is not there. You keep MSR with you; we Pakistanis don't have any need of him. If he does any good work we will praise him but the work he is doing using Geo, we have no need of it.

[20] And in the end, in the end, I will say, our war in exposing them is against their mechanism, their negative reporting. We don't have a personal war. We will not hit below the belt, we will not talk about their families, their personal things, nothing like this. Our goal is that MSR is not important for Pakistan, you Pakistanis are important; our country is the most important thing for us. Thanks a lot.

(The numbers in square brackets have been added; the words complained of are underlined.)

3. **D1's Second Video**

English translation of words spoken in Urdu:

“[1] In the name of Allah, the most beneficent, the most merciful. I hope you all are fine. First off, I am very thankful to all the people on social media, Facebook, YouTube, Twitter, and Instagram, who liked my videos. You supported my concern in the form of comments or by sharing it. I am very thankful to you for your support. I want to give you good news. There is good news. But before letting you know about it, I want to give the credit to you all because I shared my concerns with you by making a video but you deserve the credit for your support because Mr Murtaza Shah, mainly because of his Twitter account, because he is mostly active on Twitter, has done factual reporting on his Twitter account for the last two weeks. Completely factual reporting, just as it should be!

[2] I am not saying that I will teach him or all other people how reporting should be done. Not at all. It is not my goal. I shared my concerns with you in my previous videos. My concern was that, for God's sake, you should do factual reporting. You should criticise. You should do fair criticism. But do not specifically target our leader Imran Khan, who is also the current prime minister of Pakistan or do not target a party. Do not distort the facts.

[3] I wish that Mr Shah now does not change his activities and does good and factual reporting. I promised you that I will give

you an update and share with you all what has been happening in the last few days.

[4] Our Mr Murtaza Shah could not understand it. I criticised his work and the way he was reporting. He could not understand it that if he can criticise someone, I also have the same right to do that. He could not probably understand that. He started to ring around and called some of my friends. I was personally saddened to learn that the first question Mr Murtaza Shah asked, the people he was contacting, he queried foremost that if I am a wealthy person or not, and whether or not I have any money.

[5] The purpose was that, if he sues me, does the case etc on me, he gets money in return. Mr Shah, I can only be sorry about it. The other thing he did was to complain to the police about me. Imagine, I just used my right and shared something with you on social media. He filed a complaint to the police against me. The police inquired about it, and I told them what I had said in my videos. I told them that, it's in front of you, as you know what I said in my videos. I have no objective to have a personal grudge to anyone. I have a concern, and as a political worker, I have raised it.

[6] They did not find anything because of which they could proceed with Mr Murtaza Shah's complaint. It does not look like that Mr Murtaza Shah will leave the matters here. But I can tell you that the police have done their investigation and let Mr Shah know about it. The third thing he has done is that he tried to bring on-board with him all the media houses and the journalists associated with different channels. You might have watched the video the report they made. Those videos also came out and in that, in God's refuge, I am telling you in this holy month of Ramadan that so many lies, so many lies that we have been threatened, this was said to me, that was said. I assure you that, in my last video or the one before that or in my all videos, I only said one thing that we are raising our concerns while remaining within ethical bounds and legal bounds, which we are entitled to.

[7] There was nothing like that. I assure you. If anything like that had happened, it is common sense that Mr Shah had already lodged a complaint with the police and the police could have taken an action against me but this did not happen. There is no bigger proof than this that all of them, all of them, the way I raise objection to their reporting, they have done the same thing here that they have crafted stories of their own and have attempted to bring others alongside that we have received threats. There is no such thing. The short message that I have for the friends that he gathered is that look brothers you all are attached to your own respective channels. Every organization has its commercial interests. If I say anything wrong about your channel, then you have the right.

[8] If I say anything wrong about your person, then it is your right. You are entitled to ask me about it. But as I have not done anything to you all or said nothing related to you all, then you should not issue statements against me based on Geo News and its reporter.

[9] There is our reporter in London whose example is like a person dancing in someone else's wedding. He was neither discussed anywhere nor his name was mentioned anywhere. I left a comment on a post but if leaving a comment is considered threatening someone, then its Allah's refuge only. Then it's my view that we should wrap up everything and let them do what they are doing.

[10] People working at ARY's Islamabad office tested positive for corona and the Islamabad office was closed. I challenge you that the ARY reporter sitting in London worldwide, Bilawal Bhutto's the Pakistan government and different kind of double meanings comments and posts, never shared a post on Facebook to pray for them, nor did he share that the daily wagers... the office was closed, and that people pray for them. Nothing. So, he is not even sincere with his organization, ARY.

[11] They had a meeting, and in it, a journalist said that I was a newcomer to politics, and that he would not do what I said. No, my brother, you do not do as I say, nor have I ever tried that you do as I say. You are a wise person and are in this field for a long time. Do whatever you want to do. I will praise good things and criticise bad things that deserve criticism. And to see the example of good, visit my timeline. Recently, a very good report came out and I praised it, and I shared it saying it was a very good report. Look, whether I am new or old, you know me very well. You know my family very well too. Whether I am new to politics or I am in this field for a long time, I know it very well from when you are doing journalism and where you started it.

[12] You should not do this. You should talk about my aim, my concern. So, I hope my brother, that you will take a little care of what you say. I was deeply saddened that all the UK journalists sat together and said, one person has said so today, tomorrow another person will say that, and after the second person, there will come the third person. So, he should be stopped now. Friend, For God's sake, have some fear of God. Is this some possession group? Is it a mafia? that you...? We have watched this in movies where you get rid of a person who speaks, so that no one else can raise their voice. Frighten him. Such things are not good. You are... It is usually thought about you people that you are well-educated and what you say carries weight. I request you not to say things like that.

[13] All of you who have gathered here, I would like to kindly tell you all if anything happens to me, my colleagues, or my family, then I will who were present in that video, in that meeting, I will

hold all of you responsible, because you all ganged up and tried to put pressure on me. Your off-the-record conversations have reached me as well. If anything happens to me, you all will be responsible. I will hold you responsible. Those who are watching should also be witnesses to what I am saying. All these people will be responsible, because I have told you very less things. I have not told you how they are trying to pressurize me and what other things they are doing. I had a personal concern that I raised, specifically about Geo news and the reporting of Mr Murtaza Ali Shah. Leave it at that. And if you want to boycott, my friend, not once, do it ten times. It will not make any difference to me.

[14] No matter how much pressure is on me, I believe in the support all of you give me. My point of view is based on truth, and I am speaking the truth. I did not call anybody. I did not ask anybody to do this or that and provide me with information about someone. I don't need it. I have not used the platform of my party. I could have done that if I wanted, but I did not do that. I could have gathered people just like you did. I could have asked all those who love Imran Khan or are the supporters of my party, I could have appealed to them, but it depends on the will of the people. We should leave it to the people to decide. This is the age of social media. You people have shown the power of social media, and I hope we will continue to raise our voices against every wrong thing and praise every good thing. Thank you.”

(The numbers in square brackets have been added; the words complained of are underlined.)

4. **D2's First Tweet**

“Shanaz Saddique [Twitter handle]

Thank you for signing the petition. Now let's share it and make a real difference [thumbs up emoji]

[Quote Tweet:]

Saif CHAUDHARY [Twitter handle] Apr 16

I support your initiative of exposing fake news runners and paid journalists who can do anything for money. I congratulate you and ask all PTI supporters in UK to sign this petition and expose corrupt journalists. Murtaza must stop corrupt journalism and stop damaging Pakistan twitter.com/ShanazSaddique...”

5. **D2's Second Tweet**

“Shanaz Saddique [Twitter handle]

Thanking for signing the petition. Now let's make a real difference and share with others [thumbs up emoji]

[Quote Tweet:]

FAISAL KHWAJA [Twitter handle] Apr 16, 2020

Replying to @ShanazSaddique

Corrupt and biased media personals in Uk, always sitting in the laps of hypocrites and looters, must b exposed and kicked out from the community activities and journalism. I'm with you on the cause and asking others to support you.

Weldon@shanazsiddique”

6. D3's Video

English translation of Urdu video:

“[1] In the name of Allah, the most beneficent, the most merciful. Hi ladies and gentlemen. I am an overseas Pakistan. This message is a very important message. Do listen to it, especially the people who love Pakistan. Ladies and gentlemen, I belong to a political party. I am an overseas Pakistani. Both you and I always pray that the situation in Pakistan gets better and the country prospers. No matter what political party one follows (some follow one party and some follow some other party), we, the overseas Pakistanis, always pray that the situation there gets better and the country progresses; there is no more poverty and the country prospers. But this is not happening.

[2] Everyone knows the reason. I won't speak a lot. I will try to keep the message short. It is not happening because no one works for Pakistan. Everyone has their own personal agendas. Every political party, journalist, judge, or lawyer, or anyone, or anyone with a connection to any institution, fills their pockets. They take care of their connections. They benefit their own people. This is the reason why Pakistan has been unable to progress. We had high hopes in Imran Khan. He was the only one left who is not corrupt. He is honest. Even Imran Khan's enemies say that this person is not corrupt.

[3] But since Imran Khan has come to power, and there is now the government of PTI, the opponents are doing their best to harm him, because they want to see them win and Imran lose. Imran Khan's government should fail at any cost, even if they have to target the army or even if they have to target Imran Khan, or anybody else. They want his government to fail and they, who have done much corruption and those who earlier harmed the country, how do we people get away with it, our life depends on it

and this person, as they say in Punjabi, they get rid of this person. Now tell me, these people doing such activities if they are not traitors then what else are they? Like this, the whole Jang and Geo group conduct is not hidden from you.

[4] Mr. Murtaza is a journalist in London. I have never met, I have never ever met him, but go to his Facebook, go to his YouTube channel, his articles, his messages, whatever he does, he tries somehow to target the army, targets Imran Khan, the Pakistani government or whatever it is. He does all these actions and tactics to specifically save his Mir Shakil-ur Rahman or to save his bosses above him or whatever else. That is why we have filed a petition against Murtaza. I request you all make sure to sign this petition.

[5] I will be thankful to you. Mr. Murtaza, let me tell you something. This message might reach you. We, the overseas Pakistanis, spend money from our own pockets and do politics for the betterment of the country. We are not employed by anyone. That is why, keep this in mind that you cannot win against us. God willing, we will expose you and show you your worth, God willing. If anyone so much as looks at Pakistan with an evil eye then, God willing, we will, we will do whatever we people can do in our capacity we will go to any extent for Pakistan because we do not have a personal agenda. You and I have never met. Neither I know you, nor you know me, but what you are doing is harming Pakistan. And do not harm Pakistan. Refrain from doing your activities. Thank you. Bye. [Song]”

(Numbers in square brackets added; the words complained of are underlined.)