Mr Scott Marcroft,

Criminal Cases Review Commission

Dear Mr Marcroft,

RE: CHRISTINE MARGARET SLOANE (DECEASED)

I hope this letter finds you well.

I am an English-qualified solicitor, currently working as a disputes resolution partner in a law firm in Dubai. I am part of Mr Seymour Platt's legal team (all of us are working *pro bono*).

I will write under separate numbering for ease of reference:

- as Mr Platt is a son of the Deceased [and indeed the sole beneficiary of her will], we trust you
 will consider him an "approved person" to bring this appeal. Indeed, as per paragraph 17 of the
 attached Petition, the Deceased, in her will, instructed Seymour to look after her rights "and do
 what he can to make sure that the truth is told about events of which I took part during my life."
- As regards the reasons why the Deceased pleaded guilty in December 1963 to two counts, I
 refer to the Petition, the attached Opinion from Counsel dated 28 February 2022; the attached
 Opinion issued by Dr Rebecca Helm dated 1 March 2022, and the attached letter from Professor
 Mike McConville dated 1 March 2022.
- 3. From my perspective, it would appear that the Deceased pleaded guilty in the knowledge that she had no hope of a fair trial, given the situation prevailing at that time. In short, a jury could not, and would not have been, objective and impartial.
- 4. Indeed, after the Deceased's guilty plea, the Deceased's Counsel drew the Judge's attention to the fact that the Deceased's denial of two additional witnesses was non-material. As explained in the attached Annex to the Petition, the Judge replied: "That may or may not be so. It is of no concern to me." The Deceased was therefore prescient in believing that the non-materiality issue would be disregarded.
- 5. As also explained in the Petition, I consider that the Deceased's situation was so dire that she pleaded guilty because she considered that prison would be a safe haven.
- 6. After her prison sentence, I believe the Deceased did not appeal her sentence because she feared the severe adverse emotional effects on her of more interaction with the Court system. She tried to put the past behind her. She had no reason to disbelieve that, in reality, the Courts

treat any lie as perjury. Nonetheless, we know that not every lie is perjury. Perhaps the Deceased had some residual doubt about this issue, which is why she made her specific request to Seymour in her will.

- 7. Whilst we believe we have provided all necessary documentation (ie the Petition with all its attachments, and the remaining paperwork referred to herein), we would be grateful if the CCRC can access and assess, given the matters we have raised:
- (i) the CCRC assessment of the posthumous application to the CCRC in respect of Stephen Ward, and
- (ii) the sealed records arising from the Profumo Affair.

We are deeply grateful to the CCRC for its kind and full consideration of this matter.

Yours sincerely,

James Harbridge

SRA No: 19272