

Our Ref: 75082.1

FAO: The Editor and Legal Department
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20 June 2024

BY E-MAIL

Dear *Byline Times*

Our client: Faith Matters Community Interest Company (Faith Matters)

We act for Faith Matters, including in relation to its national project Tell MAMA, a victim support service which records and measures anti-Muslim incidents in the United Kingdom and provides support to victims of anti-Muslim hate and Islamophobia.

We refer to enquiries sent to our client by your journalist, Nafeez Ahmed (copied to this letter), at 7:54pm yesterday, 19 June 2024, requesting a response by 4pm today (the **Enquiries**). Our client has instructed us to write to you on its behalf.

Background

Your Enquiries relate to Companies House filings made by Faith Matters and two of its directors, Iman Abou Atta and Haifa Shhadeh, and are said to be *"based on letters by Baroness Shaista Gohir to Michael Gove and Baroness Scott at DLUHC"*. Our client has not been provided with copies of these letters and they do not appear to be in the public domain. We therefore presume that Baroness Gohir has leaked these letters to you for the purposes of running a story about Faith Matters.

The Enquiries allege that there are *"discrepancies"* in Ms Abou Atta's and Ms Shhadeh's filings on Companies House. Without specifying what these discrepancies are, the Enquiries boldly assert that they suggest that Ms Abou Atta and Ms Shhadeh *"have provided false information deliberately to Companies House"*, a criminal offence punishable by imprisonment and/or a fine.

The Enquiries also allege that *"from 2016 onwards, Faith Matters stopped referring to Tell Mama and did not report that its work involved national anti-Muslim hate crime monitoring"* in its Community Interest Company (**CIC**) reports. The Enquiries allege that *"instead other miscellaneous issues such as social media literacy and countering extremism were reporting as the main work"*. Remarkably, the Enquiries conclude

from this that *"the Government has potentially wasted up to £6m of public funds on Tell MAMA since 2016/17 which has been spent without proper due diligence and transparency"*.

It is clear from the nature and prejudicial tone of the Enquiries that you have no intention to engage in good faith with Faith Matters and have no interest in any objective and impartial analysis of Faith Matters's work. It is remarkable that you would allege that criminal offences have been committed by two of Faith Matters's directors based on unspecified *"discrepancies"*, and that £6million of public funds have been *"wasted"* on the basis of the wording of Faith Matters's CIC reports as filed on Companies House.

This approach is consistent with your previous reporting on Faith Matters, in particular an article dated 9 March 2024 published on your website entitled *'Downing Street Backtracks on Appointing its Chosen Anti-Muslim Hatred Advisor Who Suppressed Conservative Neo-Nazi Ties - After Byline Times 'Inquiries'*, available at the following URL: <https://bylinetimes.com/2024/03/09/downing-street-backtracks-on-appointing-its-chosen-anti-muslim-hatred-advisor-who-concealed-conservative-neo-nazi-ties-after-byline-times-inquiries/> (the **Article**). The Article, also authored by Mr Ahmed, wilfully misreports the facts surrounding the commissioning and preparation of an investigative report in respect of networks of far-right extremism within Europe, commissioned by Tell MAMA and produced by Mr Ahmed in 2016, entitled *'Return of the Reich: Mapping the Global Resurgence of Far-Right Power - an INSURGE intelligence investigative series commissioned by Tell MAMA'* (the **Report**).

Our client has instructed us to set out the true position in respect of both the Article and the Enquiries as below.

The true position

The Article

As regards the Article, it falsely alleges that Tell MAMA and its director at the time, Mr Fiyaz Mughal OBE, attempted to suppress findings in the Report, including the section stated within the Article as identifying the Conservative Party's *"ties to racist, anti-Muslim, neo-Nazi and antisemitic sympathies of wider far-right groups across Europe - many of whom were working directly with the Conservative Party and right-wing groups in the US who supported Donald Trump"* in a bid to preserve its own relationship with and funding from the UK Government (the **Suppression Allegation**). The Article also falsely alleges that, in response to your publication's enquiries, The UK Government reversed its decision to appoint Mr Mughal as its independent advisor on anti-Muslim hatred (the **Appointment Allegation**).

The Allegations are false. The true position is summarised as follows:

1. Neither Tell MAMA nor Mr Mughal has ever sought to *"suppress"* any findings of the Report, nor did Tell MAMA and/or Mr Mughal ever communicate to Mr Ahmed that any part of the Report could not be published to the public. We note that the Report, which was published in full in six parts between 20 and 23 June 2016, remains accessible online, including on Medium.¹ Instead, as

¹ <https://medium.com/return-of-the-reich>

set out below, Tell MAMA and/or Mr Mughal provided feedback and comments on a rolling basis in respect on the various draft versions of the Report to Mr Ahmed, requesting that they be considered for inclusion. Such feedback and comments included raising questions in respect of the veracity of evidence, the requirement for credible sources, the need for full citations to the Report, and comments regarding the structure and presentation of arguments within the Report. Mr Ahmed did not agree to these requests. Therefore a solution was reached in which Tell MAMA would be publicly credited as having commissioned the Report and able to publish those parts of the Report which it considered to be credible on its website and social media channels, whilst Mr Ahmed would publish the full Report in six separate posts on his platforms, including the INSURGE Intelligence platform.

2. The UK Government did not withdraw/cancel Mr Mughal's appointment. Mr Mughal himself requested to withdraw from the appointment process because of the horrific abuse including physical threats from Islamophobes he received following the leaking to the media (including GB News) of his planned appointment. It was his decision.

A set out below, the Article represents a grave mischaracterisation of the events, including the written and verbal communications between Tell MAMA, Mr Mughal and Mr Ahmed in 2016 discussing the different draft versions, and subsequent publication of the Report online by Tell MAMA and Mr Ahmed. The result is the publication of defamatory and false allegations against our client and Mr Mughal.

The Suppression Allegation

Tell MAMA did not seek to "*suppress*" any part the Report as the Article falsely alleges. Tell MAMA published those extracts of the Report which it was able to satisfy itself were referenced, fully evidenced and properly arguable. Tell MAMA consistently raised drafting and referencing points and concerns with Mr Ahmed throughout the process of the Report being prepared. Namely, the need for full evidence and citations and the proper presentation of arguments to support the conclusions reached. These concerns were repeatedly discussed with Mr Ahmed at the time over email and verbally. When Tell MAMA staff provided feedback on the draft Report to Mr Ahmed, he refused (without proper reason) to incorporate much of that feedback notwithstanding the fact that the investigation and Report had been commissioned by Tell MAMA and that the concerns which Tell MAMA raised were with a view to strengthening the credibility of the Report. Mr Ahmed was obstinate in refusing to incorporate many of Tell MAMA's requested clarifications and amendments to the Report, and ultimately a decision was reached at Tell MAMA that it would not be able to publish the Report in full unless these concerns were headed.

Mr Mughal explained to Mr Ahmed the basis on which Tell MAMA reached this decision in a meeting with Mr Ahmed. In a subsequent e-mail exchange, Mr Ahmed accepted Tell MAMA's position and confirmed that Tell MAMA could publish whichever parts of the Report it desired. Mr Mughal agreed that Mr Ahmed should publish the Report on his own channels and on third-party channels and informed Mr Ahmed he could use Tell MAMA's name in connection with the Report to ensure that it was clear that Tell MAMA had commissioned the investigation resulting in it. At no point did Mr Ahmed claim that Tell MAMA was "*suppressing*" the Report, simply because it was not. Tell MAMA published on its website and its social media channels

those parts of the Report which it could stand by as credible and would withstand intense public scrutiny and questioning, as was its right and as was agreed, because of its concerns in respect of the credibility of certain sections, notably four pages within a section titled *"How UK Conservatives aided and abetted German fascists"* within the 50-page Report. This section sets out what the author says is his evidence of the UK Conservative Party (then led by David Cameron) facilitating the resurgence of right-wing parties in Europe, notably through allyship with parties with Nazi heritage, sympathies and ideology.

Aiding and abetting is a legal doctrine related to the guilt of someone who aids or abets (encourages, incites) another person in the commission of a crime. On any sensible and objective analysis, the text, sources and citations for this section of the Report in the final draft provided to Tell MAMA, do not demonstrate without doubt how the UK Conservative party (then led by David Cameron) had aided and abetted German fascists to commit crimes. We note that this section of the Report is contradictory in parts, for example it states *"To his credit, David Cameron had opposed the AfD's entry into the Tory-led ECR in June 2014 amidst mounting evidence of its extreme nationalist agenda but was defied by two of his own MEPs."*

Following 2016, Mr Ahmed and Tell MAMA had limited communication, although Mr Ahmed did contact the organisation to ask for further financial support for his work. It appears that Mr Ahmed has since revisited and re-imagined the events of eight years ago, namely the communications surrounding the Report and has retrospectively decided that he was caught up in a conspiracy of suppression involving Faith Matters, Mr Mughal, and the Conservative Party. We and our client can only speculate that Mr Ahmed is doing so either because he harbours some form of unfounded ill will towards our client and Mr Mughal i.e. maliciously. Alternatively, he may be that he has seen an opportunity eight years later to create chatter and publicity around his work, platform and writings, including those which focus on suppression as a key theme within this work.

This false allegation is premised on further falsities within the Article, namely that Mr Mughal purportedly told Mr Ahmed that Faith Matters's Tell MAMA project would risk losing significant funding from the Government if the Report was published as proposed by Mr Ahmed. Our client did not record these calls. Therefore, we are instructed in unequivocal terms that the calls as described in the Article did not happen in the anyway close to the terms described. Aside from the basic fact that the funding arrangements as outlined in the Article are incorrect (in particular, Tell MAMA has never received any funding directly from the Home Office), Mr Mughal did not tell Mr Ahmed that they could no longer work together in response to Sabin Khan's *"threat to cut off the Home Office's funding to Tell MAMA due to the fact that it was working with me"* (Mr Ahmed). Mr Mughal received no such ultimatum from Ms Khan, nor could he because Faith Matters's Tell MAMA project does not receive funding from the Home Office. It follows that Mr Mughal would not have been able to relay such a fanciful ultimatum to Mr Ahmed unless he decided to fabricate the contents of the call with Ms Khan (which he had absolutely no motive to do).

The Appointment Allegation

The decision for Mr Mughal to withdraw from the appointment as advisor on anti-Muslim hatred was his and his alone. He took this decision because of the horrific abuse he received following the leaking to media of his planned appointment. It had nothing whatsoever to do with Mr Ahmed's / your publication's enquiries.

On 8 March 2024, it was leaked in several media outlets, including *GB News*, that the Government intended to appoint Mr Mughal as its new advisor on anti-Muslim hatred. Following this leak, Mr Mughal received a barrage of hate and abuse online including threats to his physical safety from extremists and Islamophobes.

Having previously suffered severe online attacks, these further targeted attacks and threats caused Mr Mughal serious alarm and distress. He was concerned not only for his own safety but that of his immediate and wider family. Mr Mughal was aware that the new role would not benefit from any security arrangements nor support and because of the torrent of abuse and the threats, he promptly informed the Government that he wished to withdraw from the appointment.

The factual chronology is as follows:

- (i) In July 2015, Mr Mughal contacted Mr Ahmed on Twitter on behalf of Tell MAMA to explore the prospect of Tell MAMA commissioning Mr Ahmed to conduct an investigation into and prepare a report regarding anti-Muslim hatred. Mr Ahmed responded in February 2016, with the two agreeing that the piece should explore connections between the right-wing and the far-right in the US and Europe. It was made clear to Mr Ahmed that the extent of publication of the report produced by him was a matter of discretion for Tell MAMA and would naturally depend on a variety of factors, including the quality of the report. The funding for this work came from Tell MAMA's reserves.
- (ii) On 4 May 2016, Mr Ahmed sent an e-mail to Mr Mughal setting out a summary of his investigation, including a summary of the four sections of the proposed draft Report. Mr Mughal responded to express interest in publicising the findings of the Report.
- (iii) On 20 May 2016, Mr Mughal sent an e-mail to Mr Ahmed making clear that a member of Tell MAMA was going to review the draft Report in the coming days. This is the first time that the Report was reviewed by anyone at Tell MAMA in any detail.
- (iv) On 24 May 2016, a member of the research team at Tell MAMA e-mailed Mr Ahmed attaching the initial draft of the Report and raised concerns in respect of the verification of sources and references for the Report's conclusions. Specifically, he stated, *"As editor, my main concern is citations – I didn't see a lot there but I trust that given your vast experience you can update them accordingly. I simply want to make sure they are credible sources."* Evidently, Tell MAMA's initial concerns regarding the Report related to the presentation of certain arguments and research methods in the Report and the sourcing of some of the information contained in it.
- (v) On 27 May 2016, Mr Ahmed e-mailed Mr Mughal and the research team at Tell MAMA attaching a further draft Report. He explained that he had added some citations but that he ignored requests to add others: *"Full citations have been added, plus a few more where Steve has requested. There are a very few points where Steve suggested adding citations which*

I've ignored largely because the information is not 'citable' in that sense or wasn't really necessary". He also explained that he had pushed back on a number of other suggested amendments: "I reverted antisemitism back to my preference 'anti-Semitism' [...] A heading which was changed ... was changed back [...] A phrase ... was deleted. I've put it back [...] I've reverted back to describing the parties more precisely [...] There are a couple of other minor language points like this where I've insisted on certain phrases to ensure the correct meaning is communicated."

- (vi) On 30 May 2016, Mr Mughal responded to Mr Ahmed's e-mail to inform him that he intended to review the further draft of the Report: *"I have printed out this report and will go through it today as I fly out. Thank you for turning this round and I will come back with any amendments marked in this report. We will also have a chat about how we place this – i.e. on a section of Tell MAMA etc."*
- (vii) On 6 June 2016, the research team at Tell MAMA e-mailed Mr Mughal maintaining his concerns with the presentation of certain arguments in the Report and the sourcing of the information contained in it. He also expressed his concerns with the fact that Mr Ahmed had rejected many of Tell MAMA's requested citations and further amendments the Report despite the fact that Tell MAMA was commissioning the report: *"From a research perspective, I'd expect this from someone who was in their first year at university. It would be wholly unacceptable to publish something under our banner without the appropriate citations. [...] Also, he's been paid to deliver this project and I expect that we have liberty to make style changes."* Again, no concerns were raised regarding the conclusions of the investigation as set out in the Report.
- (viii) On 7 June 2016, Mr Ahmed e-mailed Mr Mughal asking if there was any update on the draft Report. Mr Mughal responded on the same day explaining that Tell MAMA had been reviewing the Report and suggesting that they meet to discuss. It is therefore false for Mr Ahmed to assert in the Article that *"a final version of my report had been edited and approved by Tell MAMA staff."* The Report was still under revision since the initial draft was sent to Tell MAMA. Indeed, Mr Mughal's e-mail of 30 May 2016 to which Mr Ahmed's e-mail responded expressly stated, *"I have printed out this report and will go through it today"*. At no point did anyone from Tell MAMA provide any final approval or sign off of the Report.
- (ix) On 13 June 2016, Mr Mughal met with Mr Ahmed. Mr Mughal explained that Tell MAMA would not be publishing the section of the Report entitled, *'The Conservative Party aided and abetted German fascists with Nazi roots'*. As set out above, the decision not to publish this part of the Report was due to serious concerns in respect of the lack of citations and sources to support this conclusion and the way that the arguments to support the conclusion was presented within the Report. This had nothing to do with the conclusions of that section of the Report – indeed, Mr Ahmed acknowledges in the Article that *"Mughal explained to me that it wasn't because he didn't believe the findings were not accurate or important"* – but around how those conclusions were arrived at and the need for sources and evidence.

- (x) Mr Mughal explained that Tell MAMA intended to publish the remainder of the Report on its channels, and that Mr Ahmed was free to publish the entirety of the Report on his own channels, including naming Tell MAMA as the organisation which commissioned the Report. Again, Mr Ahmed confirms this in the Article: "*His solution was for Tell MAMA to publish the series except the section highlighting Conservative far-right ties. Meanwhile, my own platform, INSURGE intelligence, could publish the entire investigation with an acknowledgment of Tell MAMA's role in commissioning the project.*" In the event, following further review of the Report and due to the existing concerns set out above, Tell MAMA decided to publish a limited section of the Report on its website.
- (xi) On 17 June 2016, Mr Ahmed sent an e-mail to Mr Mughal discussing correspondence he had had with OpenDemocracy regarding the Report and setting out some thoughts in relation to the publication of the Report. As part of this e-mail, Mr Ahmed acknowledges that Tell MAMA "*can publish its own edited version of the series*". He also expressly stated: "*Part two is the one which focuses heavily on the Tories, so you can either just skip that one completely or run a version that your team has edited to your satisfaction. Happy to leave that ball in your court.*"
- (xii) Mr Mughal responded to Mr Ahmed's proposals, including confirming that Mr Ahmed could publish the Report on his own channels and on third-party channels while making clear that, "*Tell MAMA independently and separately commissioned Insurge-Intelligence to look at networks of far right extremism within Europe with a view to assessing the impacts of far right extremism in Europe. The views and opinions in the reports do not necessarily represent views and opinions of Tell MAMA.*" Mr Mughal also responded to Mr Ahmed stating that Tell MAMA's decision not to publish the relevant section of the Report "*is not because we are unwilling to challenge Conservative or any political party in terms of anti-Muslim hatred. It is because this section needs more detailed drilling down given the nature of the claim made and for us, it would mean that we would have to have a lot more evidence when the attacks came.*"
- (xiii) On 20 June 2016, sections of the Report were published on Tell MAMA's website. Tell MAMA's social media channels also publicised the publication of the Report. Mr Mughal sent an e-mail to Mr Ahmed on the same day confirming this. They also exchanged e-mails later that day about OpenDemocracy's publication of the Report. It is therefore staggering that Mr Ahmed would claim in the Article that, "*Tell MAMA did not publish, amplify or campaign on any of the findings revealed in my investigation, which it had commissioned. There was no report launch, no social media campaign, and no press coverage.*"
- (xiv) On 1 August 2016, Mr Mughal had a telephone conversation with Mr Ahmed in which he explained that he had had a conversation with a member of the Home Office about the Report and about being careful about not making claims that were unsupported by credible evidence. However, it now appears that Mr Ahmed misunderstood this conversation and took it to mean that the relevant member of the Home Office was

threatening our client and defaming Mr Ahmed. After Mr Ahmed expressed an intention to contact the relevant member of the Home Office directly, and to issue a formal complaint, Mr Mughal attempted to calm him down but to no avail – he eventually sent a formal complaint on 29 November 2016 which he forwarded on to Mr Mughal.

- (xv) Until he e-mailed Mr Mughal on 8 and 9 March 2024 for comment on the Article prior to its publication, Mr Ahmed had limited contact with Mr Mughal, and any member of Tell MAMA, after November 2016: on 16 January 2018, Mr Ahmed requested to connect with Mr Mughal on LinkedIn, and on 29 January 2018, Mr Ahmed sent a direct message to Tell MAMA on Twitter asking if it would financially support his work.
- (xvi) We note that, in the intervening period, Mr Ahmed has publicly referred to the Report, and the fact of it having been commissioned by Tell MAMA, including in submissions of evidence to Parliament. In 2016, Mr Ahmed provided evidence in a submission to a Home Affairs Select Committee inquiry in which he stated:

"In February 2016, I was commissioned by the leading national hate crime charity Tell MAMA to undertake a series of investigations into the network dynamics of the international far-right. The investigative series was published on Tell MAMA's website directly, and was also published jointly in June by Tell MAMA and INSURGEintelligence as a digital report".²

Mr Ahmed also stated this when he provided evidence in a submission to a Home Affairs Select Committee in 2019.³ Throughout both submissions, he refers to the Investigation and the Report as *"my full investigation commissioned by Tell MAMA"*, *"my investigation for Tell MAMA"*, etc.

This record of contemporaneous correspondence fatally undermines any suggestion that Tell MAMA and/or Mr Mughal suppressed the Report, or that Mr Ahmed had any genuine belief that they did. On the contrary, Tell MAMA actively encouraged its publication on Mr Ahmed's channels and itself published those parts of the Report which were supported by credible evidence and sources (with citations) and that the arguments were drafted properly to support the conclusions reached.

The Article represents a serious misrepresentation of the discussions and chronology from 2016 in respect of the drafts of the Report and its subsequent publication. The Article also falsely stated that the Government *"reversed"* and *"[backtracked]"* on its decision to appoint Mr Mughal as advisor on anti-Muslim hatred. As set out above, Mr Mughal chose to withdraw from the appointment as a direct result of the abuse and threats he received after the planned appointment was leaked in the media.

The Enquiries

As regards the Enquiries, as set out above, it is clear that you intend to report that Ms Abou Atta and Ms Shhadeh have committed a criminal offence by deliberately providing false information to Companies House (the **Discrepancy Allegation**), and that the Government has wasted £6million of public funds on Faith Matters (the

² <https://committees.parliament.uk/writtenevidence/75711/html/>

³ <https://committees.parliament.uk/writtenevidence/98948/html/>

Wasted Funds Allegation). These Allegations are based on *"letters by Baroness Shaista Gohir to Michael Gove and Baroness Scott at DLUHC"*, copies of which our client has not seen and which do not appear to be in the public domain. As we say above, it is to be inferred that Baroness Gohir has leaked these letters to you for the purposes of running a story about Faith Matters.

As regards the Discrepancy Allegation, as noted above, you have not specified what these discrepancies are despite making a serious allegation of criminality based on them. The only discrepancy of which our client is aware is in Ms Abou Atta's addresses as recorded on Companies House in respect of various entities of which she is director. Ms Abou Atta has occasionally used the registered address of the relevant entity as her correspondence address, and has occasionally used a PO box address which the relevant entity uses. This has been done for security reasons and is lawful and standard practice. Assuming that this is the discrepancy that is alleged, to suggest that a criminal offence punishable by imprisonment and/or a fine has been committed is misconceived and must not be published.

As regards the Wasted Funds Allegation, this is based on the assertion that *"from 2016 onwards, Faith Matters stopped referring to Tell Mama and did not report that its work involved national anti-Muslim hate crime monitoring"* in its CIC reports as filed on Companies House.

Following the 2016 referendum on Brexit, and the increase in extremist right-wing attacks on Faith Matters and the work that it carries out, as well as specific targeting of members of Faith Matters, the organisation took a number of measures designed to reduce the risk faced by its members. Amongst other measures, Faith Matters began to refer less explicitly to the names of the projects it works on in some public forums. It did so whilst continuing its important work.

Notwithstanding this, it is demonstrably false to allege that Faith Matters *"from 2016 onwards, Faith Matters stopped referring to Tell Mama and did not report that its work involved national anti-Muslim hate crime monitoring"*. By way of inexhaustive example:

1. In its 2016 CIC report, Faith Matters referred to *"the launch of 4 major research reports on anti-Muslim hate crime monitoring, intra-Muslim hatred and on the mapping of hate crimes in general"*, and to the fact that it *"held over 130 community outreach events to get Muslim communities to be aware of reporting in hate incidents and crimes"*.
2. In its 2017 CIC report, Faith Matters referred to the fact that it had *"provided counselling, one to one advice, signposting and pastoral care services to people affected by hate crimes through the Tell MAMA project in 2016/2017"*.
3. In its 2018 CIC report, Faith Matters referred to the fact that it *"provided support services [...] for victims of anti-Muslim hate"*.
4. In both its 2019 and 2020 CIC reports, Faith Matters referred to the fact that it had *"worked with a diverse range of communities from all backgrounds to increase their level of understanding on how to report hatred and intolerance"*.

In short, Faith Matters did not stop referring to Tell MAMA or its work relating to anti-Muslim hate crime. It expressly referred to Tell MAMA in its 2017 CIC report and referred to its work relating to anti-Muslim hate crime in other reports.

Furthermore, and in any event, its work on issues such as *"social media literacy and countering extremism"* is self-evidently inextricably linked to its work on anti-Muslim hate crime monitoring. It is nonsensical to seek to artificially separate these connected strands. Funding has been provided by the Government to Faith Matters to support its work as a whole, including all of the above strands. It is wrong to allege that the funding that has been provided has been *"wasted"* and has been *"spent without proper due diligence and transparency"*.

Your reporting is indefensible

It is clear from your cynical approach to engaging with and reporting on our client that the Article and any future reporting on our client would not be legally defensible.

The Article is, and any article based on the Enquiries would be, indefensible and no defence pursuant to section 2 (truth), section 3 (honest opinion) nor section 4 (public interest) of the Defamation Act 2013 would be applicable. The Allegations in the Article and in the Enquiries are false, precluding a section 2 defence. As to section 3, the Allegations in the Article are presented as fact and, in any event, even if they were held to be opinion, as the contemporaneous e-mail exchanges between Tell MAMA and Mr Ahmed demonstrate, Mr Ahmed did not in fact hold that opinion.

Faith Matters and its project, Tell MAMA, support investigative journalism that is in the public interest – indeed, that is why it commissioned the Report. However, as you will be well aware, there is no public interest in publishing false allegations which mislead the public, precluding a s4 defence.

Far from being an example of such journalism, the Article and Enquiries levy highly defamatory and false allegations against Faith Matters. The publication of the Article has caused – and, for as long as it remains online, will continue to cause serious harm to Faith Matters, Tell MAMA and Mr Mughal. The publication of any article based on the Enquiries would similarly cause very serious harm for which you would be liable.

Next steps

Faith Matters is an important and integral organisation in UK society. Its project, Tell MAMA, is an important service, not just to the approximately 28,000 members of the public who have used it over the last decade, but to the wider public and to partners who can access its resources and data to understand and support actions to stop Islamophobia and anti-Muslim hate in the UK.

Faith Matters's importance has increased year on year over the decade of its existence and significantly over the past few months given the very concerning rise in Islamophobic incidents in the UK. Its credibility depends on trust in its work, and in particular the trust placed upon it by the Muslim communities in the UK. The Article strikes at the heart of Faith Matters's and Tell MAMA's credibility and has caused harm to its reputation, including its good standing in the Muslim communities – and any article published based on the Enquiries would compound such harm.

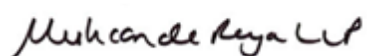
Given the importance of the work it carries out, Faith Matters will not be drawn into what appears to be a wider culture war between organisations whose stated purpose is to serve the Muslim communities in the UK.

Now that you are on notice of the true position in relation to the Article and the Enquiries, you must remove the Article and must not publish any article based on the Enquiries.

Our client's position in respect of damages and costs in respect of the Article – to which it would undoubtedly be entitled – and in respect of any further publication will be determined by the speed and fullness of your response.

In the meantime, its rights are expressly reserved.

Yours faithfully

A handwritten signature in black ink that reads "Mishcon de Reya LLP". The signature is written in a cursive, slightly slanted style.

Mishcon de Reya LLP