

Made on Behalf of: Defendant  
Surname and Initials: Lesley Card  
Statement Number: First  
Initials and Number of Exhibits: LC1 - 3  
Date Statement Made: 30 November 2017

**IN THE HIGH COURT OF JUSTICE  
CHANCERY DIVISION**

**CLAIM NO: HC-2016-002849**

**B E T W E E N:**

**SIR CLIFF RICHARD, OBE**

**Claimant**

**AND**

**(1) THE BRITISH BROADCASTING CORPORATION**

**(2) THE CHIEF CONSTABLE OF SOUTH YORKSHIRE POLICE**

**Defendants**

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**WITNESS STATEMENT OF LESLEY CARD**

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I, **Lesley Card**, care of South Yorkshire Police, Carbrook House, 5 Carbrook Hall Road, Sheffield, S9 2EH **will say as follows:**

1. I am a media relations officer in the South Yorkshire Police corporate communications department. I have worked for South Yorkshire Police since September 2012. Prior to this I worked in similar roles in the private sector.
2. In the weeks leading up to the execution of the search warrant I was briefed about the investigation into Sir Cliff Richard by one of my managers; I cannot remember which one. I was not told any of the details of the investigation at this time, which was not unusual, and I assumed that I had been told in case there was a need to put a media strategy in place which would require me to undertake any actions.
3. I have been shown an email dated 14 July 2014 from Dan Johnson to Carrie Goodwin which is exhibited to this statement as "**Exhibit LC1**". The email suggests that Dan Johnson was going to wait for me to call him about an abuse case. During my time at South Yorkshire Police I have spoken to Dan Johnson on a number of occasions. When he was a local reporter he would phone the desk from time to time to enquire about

cases or collisions and I would speak to him then. I do not remember speaking to him around this time about an abuse case or any other case.

4. After this I was briefed by one of my managers that there would be a search warrant executed at one of Sir Cliff Richard's home and that I would be the bronze media relations officer on the search warrant. This meant that I was responsible for performing actions on the ground. Carrie Goodwin was the gold media relations officer who set the overall strategy and Joanne Wright was the silver media relations officer who was responsible for implementing the strategy. I was aware that the BBC knew about the search warrant and the impression I got from the briefings was that we were working with them to keep them onside. I was briefed that my role was to accompany the officers to the location of the search warrant and I would deal with any enquiries from the press at the location.
5. On 13 August 2014 I travelled down to Berkshire and stayed at a hotel. I was aware that the operation was highly confidential and I remember telling my family that I was going to a conference and had to stay overnight. I think there was briefing at a Thames Valley police station the night before but I cannot be certain. I recall that the officers thought that it might not be possible to get access to the property because they believed that Sir Cliff Richard was abroad.
6. In the evening of 13 August 2014 I exchanged text messages with Carrie Goodwin, which are exhibited to this statement as "**Exhibit LC2**". Carrie told me that the BBC were putting up a helicopter once the search team had gone in. She sent me Dan Johnson's mobile number and asked me to call him in the morning once I knew what time the warrant would start to ensure that he did not get there before us. I take my job seriously I wanted to make sure that I did what I had been asked to do properly.
7. In the morning there was a briefing at a Thame Valley police station and after this I called Dan Johnson and told him that the search team was travelling to the location and that we would be entering through the front gate.
8. When we arrived at the location I saw Dan Johnson and other members of the media on the road outside the property. After we have gone into the

properly I text Carrie to let her know we had gone in and that the BBC had filmed us going into the property. These text messages are exhibited to this statement as **"Exhibit LC2"**.

9. The officers on the search party could see the property was a long way from the front gates where I was supposed to be based to deal with any media enquiries. They did not want to leave me out on the road so I went into the site with them.
10. Dan Johnson continued to call me but I did not answer any of his calls after this. I sent him a couple of text messages to let him know that the search team had not gained access to the property and also to let him know when they were going in. I confirmed that the officers had gone in and gained access. He continued to text me to ask me whether Sir Cliff Richard was at home, whether his property was the penthouse and asking me to let him know when officers were going to bring out any items of property so the BBC could get footage. I did not want to answer them because I felt that it was going beyond what I had been told to do. I text Carrie to ask her what to do and she told that it was up to Dan to do his own research so I did not respond to him again. I also let Carrie know when Sir Cliff Richard's lawyers arrived. These text messages are exhibited to my statement as **"Exhibit LC2"**.
11. Later that morning I was contacted by Thames Valley Police who let me know that they were sending an officer down. I did not think that this was necessary because it did not seem to me that there was anything that needed to be managed at this time.
12. Dan continued to call me and eventually my Blackberry crashed so I do not know if he called me again after that. When it started working again I took some photos of the text messages from Dan Johnson because I thought they might be useful. Copies of these photos are exhibited to my witness statement as **"Exhibit LC3"**
13. When the search warrant had been executed I travelled back to south Yorkshire with the officers. I took the day after as annual leave. When I returned to work I was not involved in dealing with the media enquiries in relation to the search and the investigation.

**STATEMENT OF TRUTH**

I believe that the facts stated in this Witness Statement are true.

Signed:  Dated: 30 November 2017  
Name: Lesley-Anne Card