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Our ref 104D/KS06/100208/000002

Your ref

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Date 23 October 2018

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Dear Sirs

Our Client: DMA Media Limited

We are instructed by DMA Media Limited which operates Iran International.

1 Background

- 1.1 You currently operate two Twitter profiles, an English language profile @Ali7adeh and a Farsi language profile @Jedaaal.
- 1.2 We understand from our client that you are a vocal critic of Iran International and have previously condemned the station and our client on social media.
- 1.3 Our client does not agree with these statements and objects to the sentiments expressed. While our client is a great advocate of freedom of speech, that does not extend to instances where the statements made are defamatory or result in the public distribution of the personal data of its staff members, which has been unfortunately reflected in your recent conduct.
- 1.4 You have published personal information and defamatory statements on both Twitter feeds as follows:
 - 1.4.1 By video you make the following unjustified statements regarding Rob Beynon and DMA Media (the **Video**):

"Rob Beydon you are the director of DMA medium, the company in charge of Iran International TV. I have received distressing and worrying reports from your employees that any criticisms of your extremely partial coverage



or any questions regarding the source of funding of your organisation immediately faces the threat of expulsion, The threat of annulment of work visa and in some cases financial [unclear] by taking the staff to the court. I believe if true this is not only extremely exploitative employment practices, which is the antithesis of any form of acceptable journalism but also is a way of obliging your staff to become the agents of a propaganda machine fanning the flames of international conflict. I ask of you to come out and clarify these allegations and also to let the employees who have been wishing to resign to do so freely".

- 1.4.2 You also attach the photos annexed to this letter of emails which refer to Panah Farhadbahman, who has recently begun working with our client, and include his personal details (the **Emails**).
- 1.4.3 A number of accusatory twitter messages have also been sent demanding a response from Mr Farhadbahman and alleging that he should be ashamed of working with our client. In these messages, you refer to our client as acting in the service of the "dirtiest dictatorship of the region", that our client and Mr Farhadbadman receive payment directly from "Bin Salman's personal account" and that Iran International is "notorious and inglorious" (the **Tweets**)

2 Defamation

- 2.1 Any reasonable viewer of the Video would conclude that our client and Mr Beynon encourage conflict by perpetuating propaganda, and force employees to perform this work under financial threat.
- 2.2 There is no truth made to these statements or to any claims that our client is in any way acting unethically. Our client strongly disagrees with your position regarding our client's apparently partisan approach and your allegations that our client disseminates propaganda as made throughout the Video and the Tweets. Our client maintains that the content of Iran International TV is governed by its editorial guidelines of balance and impartiality, which are transparent and published on our client's website.
- 2.3 Importantly there is absolutely no foundation to your suggestion that employees must comply with our client's editorial demands or risk the revocation of their work visa. In making these claims to damage our client's reputation, you clearly attempt to impact our client's ability to hire staff and work with contractors going forward and thereby to damage our client's business financially.

3 Data Protection

- 3.1 As well as publishing defamatory material about our client, you have published personal information of Mr Farhadbahman on your Twitter feed, taken from a private internal email.
- 3.2 There is no journalistic merit or purpose in posting the Emails, other than to publicise Mr Farhadbahman's work with our client and thereby apparently disparage Mr Farhadbahman by association and to share his personal contact information.

- 3.3 We understand that the posting of these Emails is the latest in a long line of threats and offensive comments made by you and your followers against Mr Farhadbahman through October 2018. These have led to Mr Farhadbahman and his family, and of other staff at our client, feeling threatened and that their security and safety has been compromised.
- 3.4 In doing so you seek to damage the reputation of our client's staff and contractors without cause or justification and in breach of the confidentiality which attaches to the Emails.

4 Next Steps

- 4.1 For obvious reasons, given the substantial damage which you threaten to cause to the reputation of our client, Iran International and its staff, our client cannot let your conduct continue.
- 4.2 As the posts of the Emails, the Tweets and the Video are defamatory and inaccurate you must immediately remove them from your Twitter feed and anywhere else where you may have published similar comments.
- 4.3 You must also desist from further inappropriate and wrongful commentary on our client, Mr Beynon, Mr Farhadbahman and other members of staff working at or with Iran International.
- 4.4 In the light of the serious ongoing harm caused to the parties' reputations as a result of the Emails, the Tweets and the Videos remaining on Twitter, please confirm by 10am tomorrow that they will be removed and an apology published.
- 4.5 In the event of matters failing to be resolved to our client's satisfaction by 10am tomorrow, we will advise our client to apply to the Court and to report the matter to the police as appropriate. At the same time, we will make immediate submissions to Twitter to have your accounts suspended pending removal of the offending material.

All of our client's rights remain reserved.

Yours faithfully



TLT LLP

Hello,

First of all, I appreciate your warm welcome. I have already known most of you and I'm happy that we are working together. I would like to thank Rob for his kindness in introducing me. Rob is one of the biggest name in broadcasting industry and hearing those nice words from him is a real honor.

I came to London in 2008 to be a member of a team who launched the BBC Persian Television. Those days Rob was the man who managed us as we learned what is a professional television looks like, after over 10 years, I'm still learning.

At the same time, it's a great pleasure for me to work with an old colleague and experienced journalist like Asghar and benefiting from the knowledge of an expert like Hossein.

I left my comfort zone to start a bigger challenge, taking part in creating a new media brand, a job that you have started 16 months ago.

So, please be patient with me in sharing your experience and I hope that I could do my share in the road ahead.

Many thanks,

Panah Farhadbahman
Creative Director
Damavand Media Ltd

m:

+44 (0) 7947928687

w:

damavand.media e: panah@damavand.media



Panah Farhadbahman

To: Aliasghar, Rob, Everyone

9/18/18

Details

PF

آقا خیلی مخلصیم. خیلی خوشحالم که در خدمت شما هستم.

Panah Farhadbahman

Creative Director

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Emails

Rob Beynon

To: Everyone Cc: Panah

9/17/18

Details



Dear All

I would like to introduce you to Panah Farhadbahman, who is joining us today. Some of you know Panah from the BBC, where he has been a highly respected and long-standing senior output figure, managing and launching many new shows, specials and programmes as well as news. He is creative, experienced, inventive and easy to work with.

Panah is coming to us as a project-focused resource. He will work closely with Pooneh and Armin initially, but he will also work with the other Senior Editors, the Output Editors, and of course the Executive Editors. He will range into Digital where appropriate too. We will deploy his skills to help us tackle certain specific challenges, whether they be re-launches, or specials, or new ways of doing what we have been doing. He will put his creative expertise at the service of the various teams, and he will also work closely with Jon and the gallery and graphics units.

I have known Panah since the early days of BBC Persian TV, and I know he will be a great addition to our operation. By adding him to our output efforts at certain key times and for important projects, we will raise the standard and quality across the board.

He is also blessed with a good sense of humour, so he will need to rely on that a fair amount...

Panah will report to the Executive Editors and to me and the editorial project seniors.

Please join me in welcoming him.

R