

WITNESS STATEMENT OF JEAN-CHARLES BRISARD

I, **JEAN-CHARLES BRISARD**, of 18, Avenue du Léman, 1025 Saint-Sulpice, Switzerland
WILL SAY as follows:

Introduction and biography

1. I am a consultant in the area of the financing of terrorism, having been involved in this field since 1997. I am Chief Executive Officer of JCB Consulting International SARL, a company registered in Switzerland which is a consulting company working in the field of business intelligence, money laundering and terrorism financing. I was the author of the report on "Osama Bin Laden financial networks" published in 2001 by the French National Assembly. Since 11 September 2001 I have testified in several court proceedings on money laundering and terrorism financing. Since June 2002, I have been the lead investigator and consultant to the lawyers acting for the relatives of many of the victims of the 11 September attacks on the US who have filed an action in the US District Court for the District of Columbia on 15 August 2002. I have also been leading a team conducting investigations into terrorism financing in a number of jurisdictions including the United States, Europe, the Middle East and Africa.

The publications concerning the Bin Mahfouz family

2. I am the co-author of the book, along with Guillaume Dasquié, entitled: "*Forbidden Truth: U.S.-Taliban Secret Oil Diplomacy and the Failed Hunt for Bin Laden*", published by Thunder's Mouth Press/Nation Books in English in about June 2002 (which was originally published in French in about November 2001 under the title "*La Vérité Interdite*") (the **Book**). In the **Book**, I dedicated a chapter to Sheikh Khalid Bin Mahfouz entitled: "*Khalid Bin Mahfouz: The Lucrative Business of Terrorism/The Banker of Terror*". The chapter alleges, amongst other things, that Sheikh Khalid Bin Mahfouz and his family are one of the principal funders of Osama Bin Laden and his Al Qaeda terrorist network and atrocities. I also accused Sheikh Khalid's son, Sheikh Abdulrahman Bin Mahfouz, of being complicit in the attempted assassination of President Hosni Mubarak of Egypt in 1995. The chapter concerning Sheikh Khalid Bin Mahfouz and his family was prepared by me without the assistance of my co-author, Guillaume Dasquié, although we obviously discussed what I was writing for the **Book**. Mr Dasquié's only involvement in writing this chapter was that he said he would try to contact Sheikh Khalid Bin Mahfouz to obtain his reaction to the allegations that we



were about to publish in the Book. My understanding is that Mr Dasquié contacted the Saudi Embassy in Washington to ask them to put him in touch with Sheikh Khalid Bin Mahfouz. The Saudi Embassy did not respond to him.

3. I am also the author of a report that I submitted to the United Nations Security Council entitled: "*Terrorism Financing: Roots and trends of Saudi terrorism financing*" dated 19 December 2002 (the **Report**). In the Report I referred to, amongst other things, Sheikh Khalid Bin Mahfouz being number one on a list of the "*Main individual Saudi sponsors of al-Qaida*" (page 11) and of being the brother-in-law of Osama Bin Laden.
4. I also provided a witness statement dated 21 May 2003 in support of the Defendants' application to have the case stayed in relation to a libel claim commenced by Sheikh Khalid Bin Mahfouz against Associated Newspapers (owners of the *Mail on Sunday* newspaper that published a defamatory article about Sheikh Khalid Bin Mahfouz on 27 October 2003), Peter Wright (the editor of the *Mail on Sunday*) and Graham Beaton (the author of the defamatory article at the centre of the defamation claim) (the **Mail on Sunday witness statement**). In this witness statement I set out the "*key evidence*" I had gathered as at that date to justify the truth of the allegations that I had made in the Book, being that Sheikh Khalid Bin Mahfouz "*knowingly supported terrorism*". I understand that this claim was settled and the Mail on Sunday printed an apology in its newspaper on 18 January 2004 and read a Statement out in Open Court acknowledging that there was no truth whatsoever in the allegations made in the article.

Proceedings brought against me by Sheikh Khalid Bin Mahfouz and Sheikh Abdulrahman Bin Mahfouz in England, France and Switzerland

5. Sheikh Khalid Bin Mahfouz and Sheikh Abdulrahman Bin Mahfouz (the **Mahfouz Parties**) commenced proceedings against me and Guillaume Dasquié in England in relation to the allegations about them contained in the Book on 16 May 2003 (the **Book action**). I defended the claim on the basis that I did not authorise publication of the English version of the Book in England. This Defence was not accepted by the English courts and on 25 May 2006 Mr Justice Gray ordered myself and Guillaume Dasquié to pay Sheikh Khalid and Sheikh Abdulrahman £10,000 damages each (the maximum permitted under the relevant provision of the UK Defamation Act 1996) and also ordered me to pay interim costs of £150,000. In addition, Mr Justice Gray ordered us to print an apology in relation to the allegations

