4 November 2024

Dear Rachel, dear Miles,

Thank you for the opportunity to respond to the provisional decision of the Criminal Cases Review Commission (CCRC) in relation to the case of my mother Christine Sloane, neé Keeler, hereafter referred to as 'Christine Keeler', or simply 'Christine', to help remind us of who she was and how she is remembered.

The following sets out my 38 crucial observations which have been prepared with the assistance of my counsel Dr Felicity Gerry KC and my solicitor Mr James Harbridge.

I am grateful that the CCRC has decided that there is "arguable merit" in the submission that the extensive prejudicial media coverage of Christine in 1963 may have placed overwhelming pressure upon her decision to plead guilty to two charges which she faced.

I am also grateful that the CCRC has accepted that Christine's defence counsel, Mr Jeremy Hutchinson QC, never conceded that Christine Keeler had confessed to the alleged crimes, only that she accepted what she had done was wrong. As the CCRC will well know, this is as far as a barrister is supposed to go in mitigation once a plea has been entered. But, in fact, he went further and told the sentencing court that her lie was immaterial (page 162 of our exhibit), receiving admonishment from the court for going too far by speaking of her innocence: The learned Recorder saying: "That may or may not be so. It is of no concern to me." This makes it plain that Christine Keeler was not guilty, had not admitted her guilt and pleaded guilty under terrible pressure to matters that were immaterial to the fact she was violently assaulted by Lucky Gordon, who confessed in court to assaulting her.

As Jeremy Hutchinson QC himself said at her sentencing hearing: "The irony of it all is that because of what she has done - it was through her stupidity[1] that Gordon went free – she has once again to face the threats and fear of this man."

As you can imagine, I am nonetheless very disappointed in the provisional decision. My response is this: **Please refer Christine Keeler's case to the Court of Appeal – deciding (a) what is material or otherwise to a violent assault on a young woman and (b) the consequence of guilty pleas in all the circumstances are quintessentially matters for the senior courts.**

I suggest the Court of Appeal is highly likely to quash Christine Keeler's conviction arising from a guilty plea following the admission of fresh evidence on appeal under s23 the Criminal Appeal Act (see *Swain* 1986 Crim LR 480). In this case there is fresh evidence (including

[1] We suggest 'naivety' is more appropriate. Times change and that is why it is time for exoneration for Christine.

evidence that is being presented in a fresh way) because Christine Keeler's case has been so poorly framed to date because of the misogynistic approaches to her life at the time, and since.

I also suggest that the CCRC's provisional decision has missed some material issues which are set out as follows:

Errors and mistakes in the CCRC provisional decision

(i) Pg 3 of the CCRC's letter dated 13 September 2024 states " ... the prosecution presented corroborating evidence to support the perjury charges against Miss Keeler, including evidence from a number of witnesses, and from a recording of Miss Keeler's conversations with others." However, the CCRC neglects, at this point, to state that:

a. Fenton and Camacchio both ultimately stated that they had witnessed the attack, and
b. on the tape, Christine confirmed that she was attacked by Gordon on the night in question [para 86 of our Petition refers].
c. Please note the typo "3 September 2024", where it should read "3 September 1963".

(ii) Pg 4: The CCRC alleges "that the lies which had been told at Mr Gordon's trial - namely that Fenton and Camacchio were not present at the scene - were considered to be sufficiently serious to lead the Court of Appeal, on 30 July 1963, to overturn Mr Gordon's conviction ..". Here, the CCRC's conclusion is wholly wrong, because:

a. Gordon was only exonerated because the Prosecution did not object or fight the appeal. Clearly, the Prosecution was at fault in this regard. [Para 69 of our Petition]
b. The Court of Appeal exonerated Gordon, whilst simultaneously stating that Christine "may well have been speaking the truth ... the Court is not holding that the complainant's evidence is untruthful." [Para 70 of our Petition]
c. Fenton has confirmed that, on the night in question, he saw Gordon hit Christine three times and, when she fell to the ground, Gordon kicked her. [Para 88 of our Petition]
d. Camacchio has confirmed that, on the night in question, he saw Gordon grab Christine and strike her, and they struggled and fell to the floor [Para 89 and 90 of our Petition]
e. The police had no doubt that Gordon assaulted Christine on the night in question [Para 63(b) of our Petition]
f. In other words, the denial of Fenton and Camacchio's presence was irrelevant - as both men confirmed they saw the attack by Gordon on Christine.

(iii) Pg 5: The CCRC is wrong to conclude that Christine's "lies" caused the conviction to be overturned on appeal. The conviction was overturned simply because the Prosecution, wrongly, did not object to Gordon being exonerated. Moreover, the Court of Appeal clearly got it wrong, given that Fenton and Camacchio both confirmed the attack took place. There is therefore a real possibility that, now, the Court of Appeal would find the conviction of Christine to be unsafe.

(iv) Pg 6: The CCRC states "it [is] difficult [to] sensibly argue" that the suppression of Fenton's presence was immaterial, given that Fenton "had been directly involved in the altercation… (rather than simply present as a bystander) …". It must be remembered that his statement to the police supported Christine Keeler's evidence. It is a nonsense to suggest Fenton was somehow implicated in the attack. At most, Fenton stopped it from being much worse (especially when one considers Gordon's previous convictions). Fenton's statement to the police supported Christine Keeler and was consistent with Gordon's confession in court. Fenton began as a shocked bystander, saw Gordon punch and kick Christine Keeler and only then reacted, saving her from an even more serious attack. There is nothing unusual about being a shocked witness before acting, and nothing material in not mentioning Fenton when Gordon admitted the assault. Ultimately, the issue was not her credit, but his admission.

(v) Pg 11: The CCRC is wrong to state: " ... there was a significant body of witness evidence which represented a strong prosecution case against Miss Keeler for perjury and conspiracy to obstruct the course of justice." The evidence was exceptionally weak, given the conduct of the judge in the Gordon trial and the lack of materiality of not mentioning two witnesses who supported her account. The Court of Appeal is, now, very likely to conclude that Christine's guilty pleas should be set aside, given that the attack on her has been confirmed by herself, the police, Fenton, Camacchio and Paula Hamilton-Marshall, and it is obvious that her pleas were entered under inordinate pressure.

(vi) Pgs 12 and 14. Given all the evidence and the public policy issues for all women, this is not a cost exercise. In any event, it would be no more than reading and drafting for the Court of Appeal to determine to quash the convictions. They will very quickly see that Christine was attacked by Gordon on the night in question and he admitted it. Gordon said at his own trial: "And did I say to her that I was very sorry for her injuries, caused by me slapping her and she ran into the door?" [Para 61 of our Petition]. The second reference to expense seems to suggest that the core reasoning of the CCRC is cost, rather than addressing the issues, which I find most distressing. I do wonder if the CCRC has focused on the fact that my mother is dead, rather than the importance of the legal issues that arise from pressurising a victim of violence to plead guilty and then be sent to prison.

(vii) Pg 13: The fact that Christine did not seek to appeal her conviction during her lifetime makes this case even more significant and poignant – she was framed abominably her whole life. Posthumously, this needs to be corrected; to publicly acknowledge the lifelong injustice and make sure justice is done, and seen to be done.

Public Interest and public policy

(viii) I **attach** further evidence from the Daily Telegraph at the time. This is The Daily Telegraph's full report (dated 7 December 1963) in respect of the 6 December 1963 Court proceedings involving Christine Keeler. I remind the CCRC that whilst, with our Petition, we had exhibited parts of the above report (e.g.: as shown by our exhibit pages numbered 6, 108, 114, 134, 141, 146 and 151), we now have - for the first time - the full report. Previously, our version was missing some key columns and text at the foot of the newspaper page. Two important aspects stand out now:

a. It was the Prosecutor himself, Mr John Buzzard, who stated in Court on 6 December 1963: "according to Camacchio, Gordon grabbed Keeler and struck her."
b. We now have additional clarity on Fenton's crucial testimony. Previously, we had (our exhibit page no 144) only been able to disclose the Daily Express report dated 3 October 1963, which stated that, after Gordon was freed on appeal on 30 July 1963, Fenton admitted he had been present on the night in question, and saw Gordon hit Christine three times and, when she fell to the ground, Gordon kicked her. The Daily Telegraph report dated 7 December 1963 contains more details about this crucial testimony of Fenton, spread over three paragraphs:

    i. "On July 18 [1963] Fenton went to see Det. Supt. Axon at Scotland Yard, accompanied by a solicitor. He said he was not present at the Gordon incident.
    ii. Fenton, arrested on Sept. 6, said to Supt. Axon: "Mr Axon, at the time I saw you my wife had an operation, and I could not tell her I was mixed up in this thing. It would have killed her."
    iii. In a statement Fenton said: "It is wrong I said I was not there. I was there when Lucky went for Christine. **He hit her three times. She fell on the ground, and he kicked her."**

(ix) The above identifies that Fenton and Camacchio saw the violent assault on Christine Keeler by a dangerous man with serious prior criminal convictions, and negates the CCRC's attempted reliance on its footnote 3, page 6 quote. Christine was plainly a victim of a serious crime, such that there was no public interest in prosecuting her for not mentioning two more men, when her female friends had rightfully and truthfully confirmed that Gordon had attacked her. It is awful that

the evidence of all these women was not considered of sufficient value by the Attorney General at the time. Notably, as stated in paragraph 46 of our Petition, Fenton's barrister stated in Court on 9 December 1963: "Fenton always felt that Gordon had been rightly convicted and he did not consider he could help the police in their inquiries by saying he was a witness to the attack on Keeler."

(x) I invite the CCRC to take notice of the fact that in 2024 (in The Times and a BBC Radio 4 documentary) the Mandy Rice-Davies' tapes are being plugged as salacious.[2] The story, wrongly framing Christine Keeler as criminally culpable for the Profumo downfall and the death of Stephen Ward, in public perception, continues never to be far away from the news. The Court of Appeal would be highly likely to conclude that there is a public interest in the public knowing Christine Keeler's true story – **that she was a victim of crime and not a criminal** – as she requested in her will, which led to this investigation which has uncovered the truth of how she was pressured into pleading guilty to alleged offences, which amounted to not mentioning two men who were witnesses to her victimhood at the hands of a violent abuser. There is a brutality to the endless inaccuracies about Christine's plight that makes the effect on family life a material consideration that would also make it highly likely that the Court of Appeal would conclude she should never have been prosecuted. The decision to prosecute her was brutal in its conclusion for any young woman who was assaulted. That she said herself she had done "wrong", is entirely tone deaf to her true story of manipulation, pressure and abuse.

(xi) It is highly likely that the Court of Appeal would consider public policy issues relating to the prosecution of such a young woman, also incorrectly framed as a 'prostitute'. The current draft of the CCRC decision does not recognise that the Court of Appeal would now be in the position to conclude that the advice from Treasury Counsel and the decision by the Attorney General would not have been influenced by any considerations contained in the current CPS Violence Against Women and Girls (VAWG) and Government policies on tackling gender-based violence. This is not a case where Christine Keeler lied about being assaulted. This is a case where the mores and social conduct at the time caused decisions to be made about Christine Keeler that failed to recognise her as a victim of crime and failed to recognise the scourge that is:

[2] BBC Sounds: **Released On:** 19 Oct 2024 "Using recently unearthed recordings of the late model and singer Mandy Rice-Davies, and news archive, Kirsty Wark looks back at the Profumo Affair of the early 1960s. This was the first British political sex scandal, and it brought down the MacMillan Government. Along with Christine Keeler, teenager Mandy Rice-Davies was at the centre of this saga, and, for the first time, we hear the whole story firsthand from this woman who was in the eye of the storm and whose life changed completely overnight. A Soho Studios Entertainment and Two Rivers Media production for BBC Radio 4" < https://www.bbc.co.uk/sounds/play/m00246dn >

a. the extreme history of Lucky Gordon's violence against women and girls where the public interest is, and was, in making it plain that he was the culpable criminal, and not her.
b. the public concern to ensure that the criminal justice system recognises the prejudices and violence which women, particularly teenagers and young women like Christine Keeler, suffer.
c. the scapegoating of Christine Keeler in the wider Profumo Affair which has extended to the point that it is generally believed that Christine Keeler went to prison because of her affair with a government minister and not because she was assaulted by Lucky Gordon and put under pressure not to mention two men who were there. Notably, two men who witnessed her being violently assaulted.

(xii) The Court of Appeal is also able to consider the effect of the approaches to prosecute Christine Keeler on her family. Plainly, her children were affected throughout their lives as well over the brutal treatment of their mother by Gordon, and by the criminal justice system.

Equivocal pleas

(xiii) It is highly likely that the Court of Appeal would conclude Christine Keeler's convictions are unsafe due to her equivocal pleas:

a. Having concluded that Christine Keeler, at such a young age, was under "overwhelming pressure" and accepted the expert evidence of Dr Rebecca Helm, logically the Court of Appeal is highly likely to conclude that Christine Keeler's pleas of guilty must have been equivocal.
b. Having concluded that Christine Keeler never confessed and that her barrister was essentially making that indication, this is good evidence that her plea was equivocal, and this is highly likely to be accepted by the Court of Appeal, despite the passing of her counsel Jeremy Hutchinson QC.

(xiv) Further, the CCRC, on page 8 of 20 of its provisional decision dated 13 September 2024, relies on Christine Keeler telling Jeremy Hutchinson QC: "I have done wrong ... " However, newspapers report in respect of December 6, 1963, give the full context, as follows:

> Start
>
> Page 4 of our exhibits attached to the Petition:
>
> "Beginning his plea for Miss Keeler, Mr Hutchinson said "Her attitude all along has been 'I know I have done wrong, and I know I must face it.' But he went on: I cannot insist too strongly that the allegation that

she shopped Gordon - giving false evidence that he assaulted her - has gone.""

Pg 116 of our exhibits attached to the Petition, namely "The Times" report dated December 7, 1963:

"The suppression of the fact that these two men [Fenton and Camacchio] were in the flat at the time of the Gordon attack was immaterial to the trial of Gordon, counsel [Jeremy Hutchinson] said."

Ends

(xv) In other words, Christine Keeler pleaded guilty, despite her own barrister indicating her lie to be legally immaterial. Accordingly, the CCRC's reliance on her words "I know I have done wrong" is without the necessary full reasoning on all the documents, including the newspaper reports in respect of December 6, 1963.

(xvi) Even the Crown's analysis at the time was that the suppression (of Fenton and Camacchio) was immaterial to the question of whether Gordon assaulted Christine Keeler. This is demonstrated by the above-mentioned pg. 4 exhibit which also had this interesting paragraph on her alleged state of mind:

"Mr John Buzzard, prosecuting counsel, then told the judge that the Crown took the view that the women may not have set out to secure Gordon's conviction, but to prevent it coming out that Keeler had been associating with other coloured men."

(xvii) The pg. 116 exhibit also shows that Jeremy Hutchinson told the Court on December 6, 1963, that:

" .. neither Fenton nor Camacchio, both married men, wanted to be involved."
"The motives for telling the lie that neither Fenton nor Camacchio was present in the flat were understandable."

(xviii) It is also worth mentioning the text halfway down the second column of our pg. 116 exhibit. Under the sub-heading "WICKED PEOPLE", Mr Hutchinson was quoted by The Times as telling the Court on 6 December 1963:

"There are in this case wicked people who want to see this young woman sent away ... There are many who want to see Miss Keeler brought down" ...

(xix) The fact is Christine Keeler pleaded guilty when she shouldn't have, and she did so in the knowledge that she could not get a fair trial, and clearly in the knowledge that there were powerful forces aligned against her, as referenced by Mr Hutchinson QC.

(xx) It is therefore highly likely that the Court of Appeal would conclude that Christine Keeler pleaded guilty because: (a) she rightly felt she wouldn't get a fair trial, and because (b) she erroneously felt bad about denying Fenton and Camacchio's presence, having inevitably bowed to their demands not to be named, and (c) she knew the crux, i.e.: Gordon had assaulted her on the night in question, and the police knew this as well. The pg. 4 exhibit includes the words:

> " .. Detective Superintendent James Axon told the judge there was no doubt in his mind that Gordon ... did assault Miss Keeler that particular night."

(xxi) Add to this that Fenton and Camacchio also confirmed that the assault happened, it follows that a court, properly directed, would have acquitted her, had she had a trial.

(xxii) In addition, it appears that the CCRC letter does not deal with paragraphs 58 and 59 of our Petition. As explained in those paragraphs, Gordon admitted at his trial that his own solicitor opposed the idea of Fenton and Camacchio testifying. In other words, even Gordon's own solicitor took the view that Fenton and Camacchio were irrelevant to the charges made against Gordon, and that their testifying would be immaterial to the question of whether Gordon was guilty or not of assaulting Christine.

(xxiii) The fact Gordon's solicitor opposed the idea of Fenton and Camacchio testifying also implies that that solicitor knew that it would be disadvantageous to Gordon if Fenton and Camacchio gave their truthful testimony as regards the night in question. The Court of Appeal is highly likely to conclude as follows: Why else would Gordon's solicitor have tried to suppress the testifying of Fenton and Camacchio?

(xxiv) Returning to the weight placed by the CCRC on the absence of Jeremy Hutchinson QC, I also draw the CCRC's attention to the following:

a. Even if we assume that Jeremy Hutchinson QC told Christine: "An immaterial lie is not perjury," the inference from all the evidence is that Christine would have pleaded guilty, even if she had been so advised. Alternatively, had she been protected from the onslaught of pressure and properly supported as a victim of crime, she may have been able to cope with a trial – in fact a totally unrealistic expectation. This is very pertinent, as the CCRC on page 8 of its provisional decision quotes the following from Mr Thomas Grant KC's book:

"Christine had to plead guilty, although only to the charge that she had lied about the presence of Fenton and Camacchio..” Jeremy Hutchinson QC would have known that Christine's lie about Fenton and Camacchio was immaterial, and therefore not something which, in ordinary circumstances, warranted a plea of guilty. Indeed, that is effectively what he told the Court in December 1963 during the perjury proceedings:

> Our pg. 116 exhibit attached to our Petition (The Times report dated 7 December 1963)
>
> "The suppression of the fact that these two men were in the flat at the time of the Gordon attack was immaterial to the trial of Gordon, counsel said."
>
> Our pg. 162 exhibit attached to our Petition (a Daily Express report dated 7 December 1963)
>
> "It has been argued with great force by Mr Hutchinson, the Recorder continued, the evidence of the three women really made no difference to the ultimate truth."

(xxv) Given that Jeremy Hutchinson QC must have been able to advise on the alleged lie being immaterial and therefore that Christine Keeler was not criminally culpable, assuming he would have so advised Christine, he would also have had to advise her it was her choice as to plea. A proper approach to everything that Mr Hutchinson QC sought to say on her behalf is that even he knew there was no prospect of a fair trial. In this regard:

> - Mr Grant KC's book refers to "the hate-filled envy of the crowds who taunted her ..."
>
> - His book also quotes Mr Hutchinson QC's words in Court: "There are people, and wicked people, who want to see this young woman - let me say it quite simply - sent away."
>
> - In the same book, the late Mr Hutchinson QC tells Grant: "There was this prevailing sense at the time that somehow Profumo's downfall was Christine's fault."
>
> - At Court, Mr Hutchinson QC also diplomatically addressed the inability for a fair trial by stating: " ... there is not a person who has come into this court today who has not entered the court with some preconceived idea of the degree of guilt or innocence of these three people." (Our Petition exhibit pg. 167).

(xxvi) The fact remains that whilst Mr Hutchinson QC was entirely correct that there was no prospect of a fair trial, it is truly appalling on all the evidence that a decision (to plead guilty) was inevitable for Christine in all the circumstances, rather than her being able to make her own informed decision with the prospect of a fair trial (which was plainly impossible). In this regard, it is noteworthy that Mr Hutchinson QC's comments about Christine over the subsequent years must be read as suggesting she could not take any advice to proceed to trial (given or not), because of the terrible pressure she was under. The following also needs to be considered:

a. Mr Hutchinson QC told the BBC's Emily Maitlis: "I don't think she [Christine] understood what was going on a lot of the time."[3]
b. In an interview with Jane Fryer, published in the Daily Mail on 19 June 2015, he opined of Christine: "Poor woman. Such beauty, but her voice! It was terribly hard and sad and false educated ... The minute she opened her mouth, all her attractiveness evaporated. She was pathetic really, so young, thrust into this extraordinary life."

(xxvii) Put simply, all the above explains why Christine entered equivocal guilty pleas.

(xxviii) The references by the CCRC to *Tredget* in the current provisional decision of the CCRC do not quite reflect how the Court of Appeal would approach this matter. Whilst identifying categories of cases in *Tredget*, this was not to limit the scope of safety, but to return the test to one of an assessment of culpability. As the Blackstone summary explains at D26.9: "The test is not that of 'legitimate doubt', still less a 'lurking doubt', but instead it must be demonstrated that the appellant was not culpable." Plainly, the Court of Appeal is highly likely to conclude that Christine Keeler was not criminally culpable

a. for the pressure she was put under by Fenton and Camacchio when considered in the context of all the other pressures upon her at the time; and
b. for the indication by the judge in the Lucky Gordon trial that she need not give fulsome answers. Please see paragraphs 42 and 43 of our Petition. This is not a criticism of the trial court *per se,* because the judge was plainly trying to help her survive the appalling cross-examination by the awful Gordon. However, the fact is that it was the judge who led her to believe she did not need to mention Fenton and Camacchio, and this will inevitably have affected her evidence in other proceedings. She was, after all, only young and not legally qualified, and of course Mr Hutchinson said she did not understand.

[3] The 100-year-old lawyer Jeremy Hutchinson - BBC Newsnight < https://www.youtube.com/watch?v=JRSsu74IDko>

c. The modern approach is to appoint counsel to cross-examine a victim when the accused is self-represented. Clearly, the judge's intervention was designed to protect Christine from Gordon's hounding of her in Court, but it had the knock-on effect of wrongly criminalising Christine Keeler which has never been addressed in any court.
d. Gordon's conduct in court was entirely consistent with the way he had been her violent stalker over a sustained duration of time.

(xxix) It is plain the Court of Appeal would conclude she had no intention to commit the alleged crimes and would have been acquitted and thus her pleas were equivocal and her convictions unsafe.

(xxx) That the Court of Appeal is highly likely to consider that Christine Keeler's pleas of guilty were equivocal and thus unsafe is also reflected in the Court of Appeal's decision-making since the decision in *Tredget*. For example, in *AFU* [2023] EWCA 23 (not mentioned in the CCRC provisional decision), the Court of Appeal quashed a conviction for conspiracy to produce drugs where, although D had pleaded guilty following adequate legal advice and his guilty plea was not vitiated, the proceedings had amounted to an abuse of process. The Court found that the CPS' guidance on prosecuting suspects who might be victims of trafficking had not been followed: had it been, the CPS would have discovered that D had been trafficked to the UK and forced to work in two cannabis factories under compulsion, and would have discontinued the prosecution. The same logic applies to Christine Keeler's case. Applying the CPS VAWG, where Christine Keeler did not lie about being assaulted by Lucky Gordon, it cannot be in the public interest to prosecute her for lying about witnesses who were able to say that she was assaulted.

Decision not to appeal

(xxxi) It is highly likely that the Court of Appeal would consider it erroneous to place so much weight on Christine Keeler not appealing during her lifetime, given the way it is accepted she was vilified throughout her lifetime and particularly during the Profumo affair – I remind the CCRC of the evidence that a baying mob attended the Old Bailey trial of Stephen Ward and threw eggs at her.

Material lies

(xxxii) The draft decision does not mention the fact that Lucky Gordon admitted assaulting Christine Keeler when he was cross-examining her in his trial. Such an admission allows an appellate court to differentiate between a lie and a material lie. The Court of Appeal is plainly in a very good position to conclude that she was telling the truth about the assault by Gordon, which was the only material issue. This is supported by the comments of the Court of Appeal in the Lucky Gordon Appeal.

The then Lord Chief Justice said: "the Court is not holding that the complainant's evidence is untruthful". Plainly, the current Court of Appeal would be heavily influenced by the comments of the Court of Appeal as constituted in the Lucky Gordon appeal. To suggest she was not telling the truth when the previous Court of Appeal had accepted she was telling the truth, makes the outcome for Christine Keeler so inconsistent that the current Court of Appeal is highly likely to quash her convictions.

(xxxiii) Notably, the Court of Appeal is highly likely to accept that there was a material reason why Lucky Gordon's solicitors and barrister saw no merit for him calling Fenton and Camacchio to testify at the First Instance trial and he would not have called them had it been possible at the time to hold a retrial. Frankly, it is obvious that he sacked his lawyers, and represented himself as a further opportunity to abuse Christine Keeler, and such behaviour would have profoundly affected her ability to give complete evidence.

(xxxiv) The current Court of Appeal would not accede to the suggestion that Fenton was somehow involved in the assault by Lucky Gordon. This suggestion by the CCRC makes no sense at all. Fenton put his hand out to stop a woman from being beaten. This does not make him part of the assault, nor does it make her evidence dishonest. She explained that she was assaulted by Lucky Gordon. Fenton supported her and her account and, most notably, a proper examination of her cross-examination by her abuser in Lucky Gordon's trial shows that the judge limited her ability to answer. The Court of Appeal is highly likely to quash her conviction when it is obvious that she was led to believe she need not give fulsome answers about potential witnesses by the judge in the criminal trial of Lucky Gordon. The current approach of the CCRC reasoning is erroneous because it suggests that if Fenton had only let the assault continue, Christine Keeler would not have been prosecuted and sent to prison.

Concluding remarks

(xxxv) There is a real possibility that the Appeal Court would find Christine Keeler's conviction to be unsafe. Put another way – the evidence shows that there is a real risk that she was wrongly convicted as a result of the judicial indications at both the Lucky Gordon trial and his appeal, the inordinate pressure she was under from Fenton and Camacchio and the wider Profumo events, including the public mob mentality of the time, as well as her own barrister's sterling efforts, within his professional confines, to try and tell the public in his plea for her (and to Thomas Grant KC before he (i.e: Mr Hutchinson) died) that her pleas were entered under that inordinate pressure, and in the context of a fair trial being impossible.

(xxxvi) It is obvious that the prosecution and conviction and sentencing of Christine Keeler were all both morally and legally wrong, given that Fenton and Camacchio

ultimately stated that they had both witnessed the violent assault by Lucky Gordon on Christine Keeler that he himself, the police, female witnesses and indeed the then Court of Appeal accepted was true. Again, notably, the Prosecutor at Christine's trial, namely John Buzzard, also stated (in Court on 6 December 1963) that Gordon had assaulted Christine.

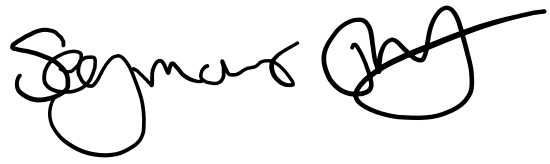
(xxxvii) I am grateful that the CCRC has not opined on the issue of Pardon and, at this stage, I seek a reconsideration of the current provisional decision, using the material provided in this letter, and reflecting on the approach to the material previously provided.

(xxxviii) It would be a very sad day for criminal justice if the opportunity were missed to right a wrong for a woman whose case has influenced cases for all women commonly wrongly framed as liars. There is a reason the photograph of her seemingly naked in a chair is still used in almost every article about her – because she has been framed as an immoral liar when, in fact, she was a victim of crime and circumstance and the powers that be at the time allowed her to take the blame.

Personally, I feel it suited the powers that be for Christine to take the blame, in the sense that "it put her in her place" and punished her for the fact Profumo was disgraced.

For all the above reasons, I respectfully ask the CCRC please to (i) review its provisional decision, and (ii) to refer the matter to the Court of Appeal. Whilst accepting such cases are rare, this is an obvious case for a posthumous adjustment.

Yours sincerely,



Seymour Platt