

IN THE CHANCERY COURT OF HINDS COUNTY, MISSISSIPPI

LET'S TAKE BACK CONTROL LTD.
A/K/A FAIR VOTE PROJECT and KYLE
TAYLOR

FILED
APR 25 2018

PLAINTIFFS

v.

EDDIE JEAN CARR, CHANCERY CLERK

CAUSE NO. G-18-612 9/3

BIG DATA DOLPHINS LTD. and
ELDON INSURANCE SERVICES LTD.

BY J. Simmons D.C.

DEFENDANTS

**COMPLAINT FOR PRELIMINARY AND PERMANENT INJUNCTION AND
DISCOVERY**

COME NOW Let's Take Back Control Ltd. a/k/a Fair Vote Project and Kyle Taylor, Plaintiffs herein, by and through counsel, and file this their Complaint for Preliminary and Permanent Injunction and Discovery, and would show unto the Court the following, to wit:

PARTIES, JURISDICTION AND VENUE

1. Plaintiff Let's Take Back Control Ltd. a/k/a Fair Vote Project ("Fair Vote") is a political organization formed in November 2017 for the purposes of advocating for and monitoring investigations, possible illegal activities, violations and/or claims, including but not limited to data mining and privacy claims privacy invasions and violations of United Kingdom ("UK") citizens in connection with the June 23, 2016 UK referendum to leave the European Union ("Brexit") and ongoing US-UK investigations into Cambridge Analytica, a UK political consulting firm.
2. Plaintiff Kyle Taylor is an adult resident of the UK and the founder and principal of Fair Vote.
3. Defendant Big Data Dolphins Ltd. ("Big Data Dolphins") is software development and data processing firm owned by Arron Banks located in Bristol, England, UK. Upon information and belief, Big Data Dolphins is not registered to do business in Mississippi.

Upon information and belief, Big Data Dolphins may be served with process at its registered office address, Lysander House, Catbrain Lane, Cribbs Causeway, Bristol, England, BS10 7TQ.

4. Defendant Eldon Insurance Services Ltd. (“Eldon”) is a UK non-life insurance company owned by Arron Banks located in Bristol, England, UK. Upon information and belief, Eldon Insurance is not registered to do business in Mississippi, and is not licensed with the Mississippi Department of Insurance. Upon information and belief, it may be served with process at its registered office address, Lysander House (2nd Floor), Catbrain Lane, Cribbs Causeway, Bristol, England, BS10 7TQ.
5. Upon information and belief, neither Defendant has any registered agent in the State of Mississippi.
6. This Court has jurisdiction and venue over the parties and subject matter of this Complaint. Complaints for discovery and requests for injunctive relief are equitable remedies well-recognized as being within the purview of the chancery courts. This Court has jurisdiction over the foreign defendants pursuant to Mississippi’s long-arm statute, Miss. Code Ann. § 13-3-57. Venue is proper in Hinds County pursuant to Miss. Code Ann. § 11-5-1 because, upon information and belief and as set forth herein, the acts complained of and personal property sought may be in Hinds County, Mississippi.¹

¹ Specifically, as set forth *infra*, the University of Mississippi in Oxford, Mississippi, in a statement to the Associated Press, acknowledged leasing property to Defendants but claimed that the leased space is now vacant. Given that Hinds County is the seat of government for the State of Mississippi, the Institutes of Higher Learning (IHL), and the University of Mississippi Medical Center (UMMC), and home to the largest number of computer and data-storage related businesses and infrastructure, this county is the likely location of any servers and/or the data at issue. Furthermore, if it is discovered that another county is a more appropriate venue, this Court possesses the power to transfer the instant Complaint to that county.

FACTUAL BACKGROUND

7. The allegations of Paragraphs 1-6 are incorporated as if fully set forth herein.
8. This Complaint arises out of the ongoing scandal over Cambridge Analytica and other UK companies illegally obtaining personal information of UK citizens for the purposes of directing political advertisements in relation to the 2016 Brexit referendum, which the British Parliament's Digital, Culture, Media and Sports committee, along with other British Government officials, are currently investigating. *See* News Articles about Cambridge Analytica, Composite Exhibit A; Affidavit of Dorsey Carson, Exhibit B.
9. Specifically, British authorities are investigating Cambridge Analytica, Eldon Insurance, Big Data Dolphins, Southern Rock Insurance Company Ltd. d/b/a GoSkippy ("GoSkippy"), Facebook and other organizations over their use of data and analytics, including alleged misuse of data from millions of Facebook accounts in political campaigns, and whether such conduct violated, *inter alia*, the British Data Protection Act of 1998. Ex. B.
10. Cambridge Analytica's use of U.S. citizens' Facebook information is also being investigated by the U.S. Congress, with Facebook CEO Mark Zuckerberg testifying before Congress on April 10 and 11, 2018.
11. On April 17, 2018, as part of the British Parliament's ongoing investigation, Brittany Kaiser, the former business development director for Cambridge Analytica, testified Tuesday before the British Parliament that the University of Mississippi partnered with Eldon Insurance, to use Facebook user data to create Big Data Dolphins. *See* Testimony of Brittany Kaiser, Exhibit C; News Articles about Cambridge Analytica-University of Mississippi, Composite Exhibit D.

12. Ms. Kaiser told British lawmakers that she believed the leadership of the Leave.EU campaign combined data from members of the U.K. Independence Party (“UKIP”) and from the customers Eldon Insurance and GoSkippy Insurance, in Mississippi, for the purposes of influencing the outcome of the Brexit vote in seeming violation of British law.
Id.
13. It is well-documented that Mississippi Governor Phil Bryant was involved in bringing Big Data Dolphins and Eldon Insurance to Mississippi through his relationship with prominent UKIP members.
14. That same day, Cambridge Analytica’s former CEO, Alexander Nix, announced that he will not testify before Parliament, citing the ongoing investigation. *See* Alexander Nix News Articles, Composite Exhibit E.
15. Plaintiff Kyle Taylor, during the time period in question, had a Facebook account and has reason to believe that his personal information was or may have been taken and transferred to Defendants in Mississippi, in violation of UK law.
16. Plaintiff Fair Vote, by and on behalf of its members and pursuant to its role as a public advocate, also has reason to believe that an unknown number of other British citizens’ personal data was transferred to Mississippi in violation of UK law.
17. Given the foregoing evidence of the potentially illegal transfer of millions of British citizens’ personal information, from social media and GoSkippy, Defendant Big Data Dolphins and/or Defendant Eldon Insurance, to Mississippi for the purpose of manipulating the 2016 Brexit referendum, Plaintiffs seek discovery regarding the location and content of the data used by Defendants Big Data Dolphins and Eldon Insurance in Mississippi, and injunctive relief prohibiting the destruction of such data.

CAUSES OF ACTION

I—INJUNCTIVE RELIEF

18. The allegations of Paragraphs 1-17 are incorporated as if fully set forth herein.
19. In determining the propriety of issuing an injunction, a chancellor must balance four factors: "(1) there exists a substantial likelihood that plaintiff will prevail on the merits; (2) the injunction is necessary to prevent irreparable harm; (3) the threatened harm to the applicant outweighs the harm the injunction might do to the respondents; and (4) entry of the injunction is consistent with the public interest." *Am. Legion Post # 134 v. Miss. Gaming Comm'n*, 798 So. 2d 445, 454 (Miss. 2001). A court is required only to "balance the . . . factors[,]" not to resolve all four factors in one party's favor or the other, to achieve equity and grant an injunction. *See A-1 Pattlet Co. v. City of Jackson*, 40 So. 3d 563, 569 (Miss. 2010).
20. Plaintiffs seek preliminary and permanent injunctive relief prohibiting Defendants Big Data Dolphins and Eldon Insurance from destroying, altering, or transferring any data or other information relevant to the issues in this case.
21. In the instant case, a balance of the four factors weighs in favor of injunctive relief.
22. First, as set forth herein, Plaintiffs have demonstrated a likelihood of success on the merits. Given the widespread reporting on this issue and the ongoing investigations by the British Parliament and the U.S. Congress, as well as the testimony of Brittany Kaiser, there is a substantial likelihood that at least some of the information sought in this Complaint is in Mississippi.
23. Additionally, and for the same reasons, Plaintiffs have demonstrated a substantial likelihood that, absent injunctive relief, the data sought may be destroyed, altered, or

transferred by Defendants beyond the Court's jurisdiction, especially considering that its very presence in Mississippi is believed to be a violation of British law.

24. Second, injunctive relief is necessary to prevent irreparable harm. The instant Complaint only seeks information relevant to the ongoing Parliamentary inquiry into data-mining related to the 2016 Brexit referendum. Injunctive relief would maintain the status quo where evidence will be required to be preserved by the Defendants. Absent an injunction, Plaintiffs will have no ability to pursue or prove any claims in the UK related to the allegations set forth herein, and no monetary damages will suffice to compensate Plaintiffs for their invasion of privacy and the harm suffered as a result of Defendants' allegedly illegal actions.
25. Third, the balance of the equities favors Plaintiffs. Plaintiffs, as set forth herein, have a need for the requested information and no other means of obtaining it. Defendants, in comparison, would only be enjoined from deleting or altering files, which would itself constitute a violation of Mississippi law related to the preservation of electronically-stored information and potentially constitute obstruction of justice as it relates to the ongoing governmental inquiries.
26. Lastly, for the same reasons, the public interest favors issuance of an injunction against Defendants Big Data Dolphins and Eldon Insurance.
27. Pursuant to Miss. R. Civ. P. 65(c), Plaintiffs will provide such security as the Court deems proper.

II—DISCOVERY

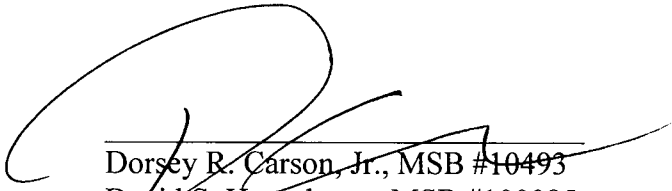
28. The allegations of Paragraphs 1-27 are incorporated as if fully set forth herein.

29. Plaintiffs, a British citizen and a British public advocacy group, have substantial reason to believe that Defendants Big Data Dolphins and Eldon Insurance have illegally misappropriated and taken private information from UK citizens, including Plaintiff Taylor, into Mississippi for the purposes of influencing the outcome of the 2016 Brexit referendum, which allegations are also currently being investigated by the British Parliament.
30. The data possessed in Mississippi by Defendants is crucial both to Plaintiff Taylor's ability to bring suit on behalf of himself, and Plaintiff Fair Vote's ability to advocate for and potentially bring suit on behalf of its supporters, in the UK.
31. Plaintiffs, as well as the British government, have diligently searched for this information in the UK, and are continuing to pursue all other available means of obtaining this information in the UK. However, Plaintiffs have no ability to determine the location or content of Defendants' data stored in Mississippi.
32. This is especially true because, upon information and belief, neither Defendant is otherwise amenable to suit in Mississippi and are not licensed to do business in Mississippi.
33. Upon information and belief, the necessary data and information are within the sole control and possession of Defendants Big Data Dolphins and Eldon Insurance.
34. Plaintiffs have no other way to obtain this necessary information absent a complaint for discovery.
35. The discovery sought herein is not ancillary to any other claims before or which could be brought in any other court in the United States, and Mr. Taylor has no other legal means to obtain this discovery in the State of Mississippi.

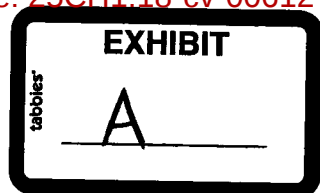
36. Accordingly, Plaintiffs request discovery from Defendants Big Data Dolphins and Eldon Insurance as to the location and contents of any data obtained from UK residents from Facebook, Eldon Insurance, GoSkippy and/or any other UK entity stored in Mississippi, and for such further relief as the Court deems proper.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs Let's Take Back Control Ltd. a/k/a Fair Vote Project and Kyle Taylor respectfully move the Court (i) for preliminary and permanent injunctive relief prohibiting Big Data Dolphins and Eldon Insurance from destroying, altering, or transferring any data or other information relevant to the issues in this case prior to its final disposition, (ii) to allow discovery from Defendants Big Data Dolphins Ltd. and Eldon Insurance Services Ltd. related to the location and contents of any data obtained from UK residents from Facebook, Eldon Insurance, GoSkippy and/or any other UK entity stored in Mississippi, and (iii) such further relief as the Court deems proper.

Respectfully submitted, this the 25th day of April, 2018.



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The Guardian



Far more than 87m Facebook users had data compromised, MPs told

Former Cambridge Analytica employee gives evidence before parliamentary committee

Alex Hern

Tue 17 Apr 2018 08.23 EDT

Far more than 87 million people may have had their Facebook data harvested by Cambridge Analytica, according to evidence from former employee Brittany Kaiser.

Speaking to the Commons digital, culture, media and sport select committee, Kaiser said Cambridge Analytica had a suite of personality quizzes designed to extract personal data from the social network, of which Aleksandr Kogan's This Is Your Digital Life app was just one example.

In evidence to the committee, Kaiser wrote: "The Kogan/GSR datasets and questionnaires were not the only Facebook-connected questionnaires and datasets which Cambridge Analytica used. I am aware in a general sense of a wide range of surveys which were done by CA or its partners, usually with a Facebook login - for example, the 'sex compass' quiz.

"I do not know the specifics of these surveys or how the data was acquired or processed. But I believe it is almost certain that the number of Facebook users whose data was compromised through routes similar to that used by Kogan is much greater than 87 million; and that both Cambridge Analytica and other unconnected companies and campaigns were involved in these activities."

Giving oral evidence on Tuesday, Kaiser said: "When I first joined the company, our creative and psychology teams, and data science teams, would work together to design some of these questionnaires."

"In my pitches I used to give examples, even to clients, that if you go on Facebook and you see these viral personality quizzes, that not all of them would be designed by Cambridge Analytica, SCL group or our affiliates, but these applications were designed specifically to harvest data from individuals using Facebook as the tool."

"So I know, at least of those two examples, the music version and the sex compass, which were both quizzes that were separate from Aleksandr Kogan's quiz. Therefore it can be inferred or implied that there were many additional individuals as opposed to just the ones through Aleksandr Kogan's test whose may have been compromised."

Facebook's chief technology officer, Mike Schroepfer, wrote in a blogpost earlier this month that as many as 87 million users may have had their data taken, higher than the previous estimate of 50 million.

Facebook told the Guardian: "We are currently investigating all apps that had access to large amounts of information before we changed our platform to dramatically reduce data access in 2014. We will conduct a full audit of any app with suspicious activity. And if we find developers that misused personally identifiable information, we will ban them and tell everyone affected."

Kaiser also said she had "specific concerns of legality" about the working practices of Leave.EU, the unofficial pro-Brexit campaign founded by the insurance magnate Arron Banks.

She described Banks explicitly asking her if there could be savings on the work Cambridge Analytica was carrying out if the company could process data from Leave.EU, Ukip and Banks' insurance company Eldon together.

"We were never commissioned to do this work," Kaiser said. "But I do believe that this work was carried out, just not by Cambridge Analytica."

Kaiser also described attending the headquarters of Leave.EU to supervise the organisation's data collection team in order to ensure that the information they received through their phone banking operation was useful for the data analysis. When there, she said, she was surprised to discover that the people staffing the phones were employees of Eldon Insurance.

"In regards to this proposal and work that I believe was undertaken, with or without us, there's a few specific concerns of legality," Kaiser said. "Firstly it's in relations to breaches of electoral law, for chargeable work, some of which I did which was never paid for, and unreported to the electoral commission."

Kaiser alleged that Cambridge Analytica had carried out £41,500-worth of work for the Leave.EU campaign, which was billed to Ukip, but not paid for.

“Secondly, I have evidence from my own eyes of possible breaches of the Data Protection Act concerning the usage of personal and commercial data of individuals in the Eldon Insurance database and possibly the Ukip database, being used for the benefit of the Leave.EU campaign,” she said.

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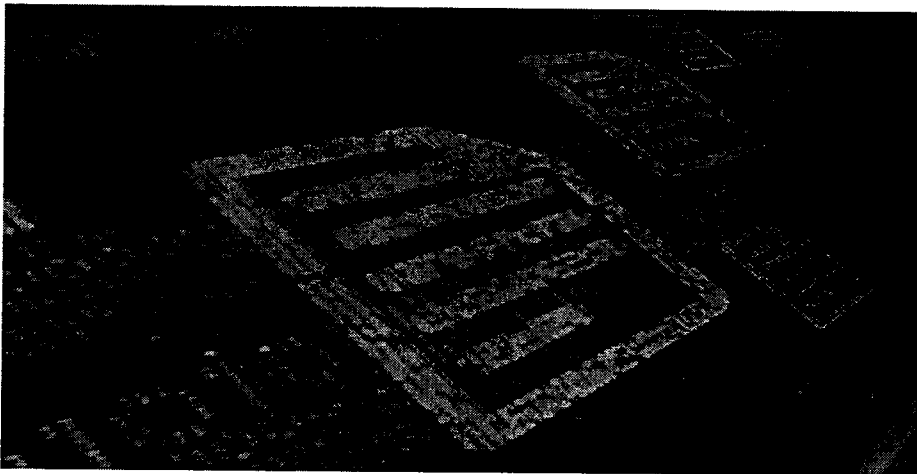
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Research on Leave.EU and Cambridge Analytica strategy published



16 April 2018

The Digital, Culture, Media and Sport Committee publishes essays from researcher Dr Emma Briant along with extracts of audio files of interviews between Emma Briant and:

- Andy Wigmore – Former Director of Communications, Leave.EU (interviewed on 4th October 2017)
- Nigel Oakes – Founder and CEO of SCL Group (interviewed on 24th November 2017)
- Sam Patten – Former employee, Cambridge Analytica (interviewed on 23rd July 2017)
- Gerry Gunster – Chief Executive Officer, Goddard Gunster (interviewed on 30th March 2017)
- [Inquiry: Fake news](#)
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Chair's comment

"Dr Emma Briant's research gives us a unique insight into the private thoughts of key people at Leave.EU and SCL. The references made by Nigel Oakes from SCL and Andy Wigmore from Leave.EU regarding the propaganda techniques developed by the Nazis are particularly concerning. As Nigel Oakes points out in his conversation with Dr Briant, the Nazis 'leveraged an artificial enemy' to make people scared, and through this to incite hatred of Jewish people.

Case: 25CH1:18-cv-00612 Document #: 2 Filed: 04/25/2018 Page 13 of 59

Andy Wigmore states that he believes that the propaganda techniques of the Nazis were 'very clever'. He also confirms that exploiting voters concerns about immigration was central to their campaign during the Brexit referendum. Given the extreme messaging around immigration that was used during the referendum campaign, these statements will raise concerns that data analytics was used to target voters who were concerned about this issue, and to frighten them with messaging designed to create 'an artificial enemy' for them to act against.

From Dr Briant's research, it is also clear that Leave.EU benefited from their work with Cambridge Analytica before the decision was made on which Leave campaign would receive the official designation for the referendum. As Andy Wigmore states, they copied the strategy that Cambridge Analytica had given them. There are understandably more questions about how Leave.EU developed their database to do this, and whether consumer data from other companies they had a relationship was used to support their campaign.

There are also more questions for Alexander Nix about the closeness of his relationship with Julian Assange, given Nigel Oakes's assertion that Mr Nix called up Mr Assange and asked if Cambridge Analytica could help WikiLeaks to disseminate Hillary Clinton's emails, during the US Presidential campaign."

Published papers:

- [Explanatory essays giving context and analysis to submitted evidence](#) (PDF 459 KB)
- [Audio File transcripts](#) (PDF 669 KB)

Audio files:

1. [Andy Wigmore – US Campaign](#) (1:24)
2. [Andy Wigmore – Immigration](#) (1:44)
3. [Andy Wigmore – Leave.EU methods in relation to Cambridge Analytica \(1\)](#) (0:30)
4. [Andy Wigmore – Leave.EU methods in relation to Cambridge Analytica \(2\)](#) (0:55)
5. [Andy Wigmore – Nazi use of political propaganda](#) (0:58)
6. [Nigel Oakes – Brexit](#) (2:45)
7. [Nigel Oakes – Company relations](#) (1:38)
8. [Nigel Oakes – Nazi methods of propaganda](#) (1:05)
9. [Nigel Oakes – Muslims](#) (2:06)
10. [Nigel Oakes – Unethical company](#) (2:20)
11. [Nigel Oakes – Julian Assange](#) (2:43)
12. [Sam Patten – Working in corrupt countries](#) (0:06)
13. [Sam Patten – SCL's work in Kosovo](#) (0:55)
14. [Gerry Gunster – Cambridge Analytica](#) (0:38)

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Facebook Canada officials grilled at parliamentary committee on privacy

During the two-hour hearing, Facebook Canada executives mostly echoed the testimony CEO Mark Zuckerberg gave before lawmakers in Washington, D.C.



More than 620,000 Canadians were among the 87 million Facebook users whose data was improperly obtained by the political strategy firm Cambridge Analytica. *Chris Donovan/The Canadian Press*

Facebook officials were grilled and upbraided Thursday by a Canadian parliamentary committee studying the Cambridge

users whose data was improperly obtained by the political strategy firm Cambridge Analytica, which attempted to psychologically profile voters in order to influence the American presidential election.

"In terms of our legislation here in Canada, PIPEDA, which requires consent ... where was the consent of 620,000 users?" Liberal MP Nathaniel Erskine-Smith asked early in the hearing.

"Perhaps you're in compliance with the law now, but it seems pretty clear you weren't in compliance with the law previously, is that fair?"

SEE ALSO

Terence Corcoran: What's even worse than an unregulated Facebook? A regulated Facebook

How Facebook ads target you

Facebook deputy privacy chief Robert Sherman said that Facebook's terms of service were "very clear" that was how the service operated at the time.

Sherman stressed that the social media giant has changed all sorts of policies since 2014, and especially in the past few weeks, to prevent this kind of information from being shared, and to limit the ability of third parties to scrape user data.

"Unfortunately those changes are only being made once this situation has been made public, and not because you ever thought this was the right thing to do," Erskine-Smith shot back.

After Erskine-Smith, Conservative MP Peter Kent said that last year Facebook threatened to withdraw Canadian investment funding if the government regulated the social network.

"We were told almost in passing that any new Canadian regulations might well put at risk Facebook investments in Canada along the lines of the \$7 million invested in the artificial intelligence project in

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Facebook Canada head of public policy Kevin Chan denied that the company needs to do anything.

"We certainly do not base our investment decisions on the specific regulatory environment," Chan said.


During the two-hour hearing, Chan and Sherman mostly echoed the testimony Facebook chief executive Mark Zuckerberg gave earlier this month before lawmakers in Washington, D.C.

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manipulate elections, spread disinformation and scrape private data from users.

Earlier this week, the committee heard from federal privacy commissioner Daniel Therrien, who is investigating the Cambridge Analytica data breach.

Therrien said that Canada is long overdue for tougher legislation when it comes to digital privacy rights, and the incoming European General Data Protection Regulation would be a good model to follow.


At Thursday's hearing, Chan was also pressed by New Democrat MP Charlie Angus about his relationship with the federal government, and whether Facebook Canada employees should be registered as lobbyists.

Angus rattled off a list of Liberal cabinet ministers who have met with Chan, and pointed to a recent meeting with Finance Minister Bill Morneau as an example of potential lobbying activity.

"With all due respect to all parties involved, (Morneau's) office reached out to Facebook," Chan said. "He wanted some advice on how to do Facebook Live for his budget speech."

Angus was underwhelmed by that explanation.

"You are registered as the company's leading public policy maker in Canada, facilitating ongoing dialogue about a broad range of issues that impact the internet sector," Angus said. "I mean, my light bulb breaks; I don't call the head of General Electric."

 **3** Comments
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Data protection**Leave.EU accused of data misuse during Brexit campaign**

Cambridge Analytica whistleblower tells MPs abuse by Arron Banks' companies was 'rife'



Brittany Kaiser appears before the digital, culture, media and sport select committee at Westminster on Tuesday © Reuters
Aliya Ram in London APRIL 17, 2018

Leave.EU has become the second pro-Brexit campaign group to be drawn into an international scandal about the use of personal data in political campaigns after a whistleblower from Cambridge Analytica testified that the group may have used information from an insurance company run by Arron Banks, the Ukip donor.

Brittany Kaiser, the former business development director of Cambridge Analytica, the British data analytics company at the centre of the revelations, told the UK's digital, culture, media and sport select committee on Tuesday that "there is reason to believe that misuse of data was rife among the businesses and campaigns of Arron Banks."

The accusations, which were denied by Mr Banks, came a day before Alexander Nix, Cambridge Analytica's now-suspended chief executive, was scheduled to give evidence to the same committee. Mr Nix has denied working for political campaigns in the UK and pulled out of the Wednesday session, citing an ongoing investigation by the UK's data protection watchdog.

Damian Collins, chair of the committee, said committee members were "minded to issue a formal summons for him to appear".

The Information Commissioner's Office, the data protection watchdog, confirmed that it had issued a request for information from Mr Banks at the end of last month.

There is reason to believe that misuse of data was rife among the businesses and campaigns of Arron Banks

Brittany Kaiser



be used in this way by Leave.EU,” she said.

Leave.EU, which was funded by Mr Banks, rejected the allegations. In a statement it said: “Eldon shared no data with anyone and to suggest they did is again another lie to attack Arron Banks and Leave.EU directly.”

Recommended

The Electoral Commission and the ICO are both investigating the campaign group.

Ms Kaiser’s allegations will raise questions about the way data were used to target British voters before the Brexit referendum. They come after Mark Zuckerberg, Facebook’s founder, admitted that more than a million of the social network’s UK users may have had their data passed to Cambridge Analytica.

Facebook has admitted that up to 87m users around the world had their data leaked to Cambridge Analytica following allegations from Christopher Wylie, a former employee of the data group.

The potential wrongdoing we’re seeing here appears so widespread that it calls into question the fairness of the referendum, and makes the

In more than three hours of evidence on Tuesday, Ms Kaiser said Cambridge Analytica had carried out extensive work for Leave.EU, including at the Bristol headquarters of Eldon Insurance, one of Mr Banks’s insurance companies.

“It seemed to me that the data sets and the staff were being used for Eldon/GoSkippy [Eldon’s motor insurance brand] as well as Leave.EU in parallel,” she told lawmakers.

She added that Cambridge Analytica issued an invoice for £41,500, which Leave.EU never paid. “If the personal data of UK citizens who just wanted to buy car insurance was used by GoSkippy and Eldon insurance for political purposes, as may have been the case, people clearly did not opt in for their data to

Cambridge Analytica’s work in the UK came under the spotlight after Mr Wylie told lawmakers last month that the company had multiple links to AggregateIQ, a Canadian data firm that received millions of pounds from Vote Leave, the official leave campaign in the EU referendum.

case for a people's vote on the EU deal even stronger

Caroline Lucas



Vote Leave has denied the links, as have Cambridge Analytica and AggregateIQ. But the group is being investigated by the Electoral Commission after whistleblower Shahmir Sanni, former treasurer of BeLeave, another Brexit campaign group, submitted evidence that Vote Leave allegedly broke campaign spending rules ahead of the 2016 Brexit vote.

Ms Kaiser said on Tuesday that Cambridge Analytica had also pitched for work with the Scottish National party, which has campaigned for Scotland to leave the UK.

The SNP said it had never worked with Cambridge Analytica but that an external consultant had one meeting with the group in London. "His assessment was that they were 'a bunch of cowboys', which turned out to be true. No further meetings were held," a spokesperson said.

Caroline Lucas, co-leader of the Green party, said on Tuesday that the latest revelations from Ms Kaiser were "damning".

"Indeed the potential wrongdoing we're seeing here appears so widespread that it calls into question the fairness of the referendum, and makes the case for a people's vote on the EU deal even stronger."

Additional reporting by Henry Mance

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Cambridge Analytica is at the center of a data scandal linked to Facebook | Daniel Leal-Olivas/AFP via Getty Images

Cambridge Analytica created own quizzes to harvest Facebook data

Controversial data mining company collected information on at least 87 million Facebook users.

By **MARK SCOTT AND ANNABELLE DICKSON** | 4/17/18, 1:00 PM CET | Updated 4/17/18, 4:54 PM CET

LONDON — Cambridge Analytica created its own Facebook quizzes and questionnaires to collect reams of data on users using the social networking giant, according to a former

senior official at the data mining company.

Brittany Kaiser, the former director of program development at Cambridge Analytica, told British lawmakers on Tuesday that the company, which is at the center of a broader Facebook data scandal, widely used such practices, including a “sex compass” quiz, to garner insight on people’s online habits.

These data-collection strategies made it highly likely that more people’s Facebook data had been collected without their knowledge than previously thought, according to Kaiser.

Cambridge Analytica is already accused of using a third-party app created by Aleksandr Kogan, a Cambridge University professor, to collect online information on up to 87 million Facebook users. Alexander Nix, the company’s former chief executive, also is now under investigation by Britain’s data protection agency in its ongoing probe into whether people’s data was mishandled during the country’s recent political campaigns.

The company denies any wrongdoing.

Nix was due to face questioning before a Parliament committee on Wednesday, but has called off his appearance, citing the investigation.

“I believe it is almost certain that the number of Facebook users whose data was compromised through routes similar to that used by Kogan is much greater than 87 million,” Kaiser told a U.K. parliamentary committee.

When asked by British lawmakers whether the Facebook quizzes created by Cambridge Analytica, which also included a questionnaire on people’s music tastes, were specifically designed to collect people’s online information, Kaiser responded: “I believe that was the point of the quizzes in the first place.”

In response, Facebook said that it was conducting an audit of all third-party apps that have used its digital platform.

“If we find developers that misused personally identifiable information, we will ban them and tell everyone affected,” Lena Pietsch, a Facebook spokesperson, said in a statement.

In several messages on Twitter, Cambridge Analytica played down its role in the Brexit vote, claiming that it never undertook paid work for Leave.eu, an anti-EU campaign group during the 2016 referendum.

During her lengthy testimony, Kaiser, an American citizen who left Cambridge Analytica in January, said that the data mining company had pitched several European political parties, including Germany's ruling Christian Democratic Union, Nicolas Sarkozy's former presidential campaign and the Scottish National Party, for work.

She also said that people within the company had suggested pitching French politician Marine Le Pen's political group, the National Front, and Germany's Alternative for Germany political party, though she could not confirm whether anyone had approached these far-right organizations.

None of the groups, she added, had accepted the offer, with many saying that the use of such data practices during EU national political campaigns "was not advisable," according to Kaiser.

In her written testimony, the former Cambridge Analytica employee also said that Arron Banks, a major donor to the British campaign to leave the European Union in the 2016 referendum, had created a data company called Big Data Dolphins after originally being pitched by the data mining company to work for the Leave.EU campaign.

Kaiser claimed that Cambridge Analytica had spent five months developing "parallel" data harvesting proposals for Banks' GoSkippy and Eldon Insurance companies, as well as the Leave.EU pro-Brexit campaign and U.K. Independence Party, two organizations to which he was a major donor.

The Leave.EU campaign unsuccessfully bid for the official designation as the pro-leave campaign group, but lost out to Vote Leave, which was fronted by now Foreign Secretary Boris Johnson and Environment Secretary Michael Gove.

The former Cambridge Analytica employee alleged that "misuse of data was rife" in Banks' businesses and campaigns and that personal insurance data may have been used for political purposes.

"It seemed to me that the datasets and the staff were being used for Eldon/GoSkippy Insurance as well as Leave.EU in parallel," said Kaiser, who spent time working at Eldon's Bristol headquarters examining the information. The potential of collection of this commercial information through Banks' insurance businesses, which may have then been used to target people during the Brexit referendum, may also be illegal under Britain's data protection rules.

Banks wrote on Twitter that Leave.EU had declined to work with Cambridge Analytica.

Kaiser also alleged that Banks refused to pay a £41,500 bill for five months of work before setting up Big Data Dolphins, which allegedly copied many of Cambridge Analytica's data mining tactics and worked with a data science team at the University of Mississippi. Kaiser claimed these U.S. researchers could have held or processed U.K. citizens' data outside of the country.

Such practices may have breached Britain's strict data protection rules, which limit what personal information may be moved outside of the country. "If the Mississippi team has held or processed UK citizens' data in the US, I believe that is likely to be a criminal offense," she wrote in her testimony.

"If the Mississippi team has held or processed UK citizens' data in the US, I believe that is likely to be a criminal offense; although it is for the empowered authorities to pursue any such question and secure the associated evidence," she wrote.

UPDATED: This article was updated to reflect new developments.

CORRECTION: A previous version of this article misspelled Brittany Kaiser's name.

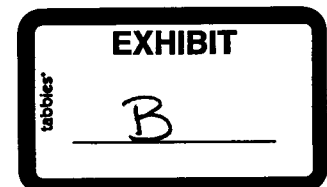
AFFIDAVIT OF DORSEY R. CARSON, JR.

STATE OF MISSISSIPPI

COUNTY OF HINDS

Personally, appeared before me, the undersigned officer duly authorized to administer oaths, Dorsey R. Carson, Jr., who, after being first duly sworn, deposes and states as follows:

1. My name is Dorsey R. Carson, Jr., and I have personal knowledge of the matters contained in this Affidavit.
2. I am adult resident citizen of the State of Mississippi, with a residence at 2037 London Avenue, Jackson, MS 39211.
3. I am over the age of 18, am not incompetent, and have personal first-hand knowledge of the facts set forth within.
4. I am an attorney licensed to practice law in the States of Mississippi, Arkansas, Georgia and Texas. While in law school at the University of Georgia, I attended the University of London for a semester, and interned with U.K. Barrister Jerome Lynch.
5. I represent Mr. Kyle Taylor, a resident of the United Kingdom, and Let's Take Back Control Ltd. a/k/a Fair Vote Project, a United Kingdom political action committee ("Fair Vote").
6. I am aware of the Data Protection Act of 1998, a United Kingdom Act of Parliament designed to protect personal data stored on computers or in an organized paper filing system. British Data Protection Act 1998 controls how personal information is used by organizations, businesses or the government.



7. Under the Data Protection Act of 1998, individuals such as Mr. Taylor have legal rights to control information about themselves.
8. I am aware that the British Parliament and British authorities are investigating whether civil and/or criminal offenses have been committed under the Data Protection Act.
9. More specifically, during the course of my representation of Mr. Taylor and Fair Vote, I became aware that the British Information Commissioner's Office is investigating British companies Eldon Insurance Services Ltd. ("Eldon Insurance"), Big Data Dolphins Ltd. ("Big Data Dolphins"), Southern Rock Insurance Company Ltd. d/b/a GoSkippy ("GoSkippy"), Cambridge Analytica, Facebook and other organizations over their use of data and analytics, including alleged misuse of data from millions of Facebook accounts in political campaigns.
 - a. I am aware that Cambridge Analytica is a British political consulting firm which combines data mining, data brokerage, and data analysis with strategic communication for the electoral process. Cambridge Analytica was started in 2013 as an offshoot of the SCL Group (formerly Strategic Communication Laboratories), a private British behavioral research and strategic communication company. The firm maintains offices in London, New York City, and Washington, D.C.
 - b. I am aware that, on or about March 27, 2018, in testimony before a British parliamentary select committee on Cambridge Analytica's role in the Brexit campaign and the improper use of over 50 million Facebook users' data in the 2016 United States presidential election, among other things, former

Cambridge Analytic employee Christopher Wylie testified that there could have been a different outcome in the E.U. referendum had there not been in his view “cheating” by the Leave.EU Campaign.

- c. I am aware that, on or about April 10, 2018, Facebook founder Mark Zuckerberg admitted to the United States Congress that his personal data was handed over to election consultants Cambridge Analytica.
10. During the course of my representation of Mr. Taylor and Fair Vote, I was given notice that, on Tuesday, April 17, 2018, Ms. Brittany Kaiser, the former business development director for Cambridge Analytica, testified before the British Parliament that the University of Mississippi partnered with Eldon Insurance to use Facebook user data to create a new data research firm called Big Data Dolphins.
11. During the course of my representation of Mr. Taylor and Fair Vote, I was made aware that Mr. Arron Banks owns Eldon Insurance, Big Data Dolphins, and GoSkippy.
12. I was made aware that Mr. Banks and Mr. Andy Wigmore, both citizens of the United Kingdom, through one or more of these British companies—Eldon Insurance, Big Data Dolphins, and/or GoSkippy—leased research and/or office space at Insight Park, which is the University of Mississippi Research Park, an incubator for businesses to access the university’s academic and research resources.
13. More specifically:
 - a. I was made aware that Insight Park is a 19-acre research and business park adjacent to the University of Mississippi campus in Oxford. According to its website, “The mission of Insight Park is to provide a dynamic research park

where businesses can take full advantage of opportunities for collaborative research, academic resources and more. Insight Park welcomes companies commercializing University of Mississippi research and who desire to work with the university to maximize their business by utilizing the human and physical resources available through such a partnership.”

- b. I was made aware that, in her testimony before the British Parliament, Ms. Kaiser also testified: “Arron Banks and Andy Wigmore have told multiple individuals that they took my proposal and copied it and they created their own Cambridge Analytica, which they called Big Data Dolphins in partnership with the data science department at the University of Mississippi. If the Mississippi team has held or processed U.K. citizens’ data in the U.S., I believe that is likely to be a criminal offense; although it is for the empowered authorities to pursue any such question and secure the associated evidence.”
- c. I was made aware that, in an interview earlier this year, Mr. Andy Wigmore said University of Mississippi data scientists would help develop the Big Data Dolphins model, saying they “met the faculty because they knew the state governor, who they had, in turn, met through their ‘Brexit journey which led them to Trump.’”
- d. I was made aware that, also on or about Thursday, April 19, 2018, Mississippi Governor Phil Bryant, through his spokesperson Mr. Knox Graham, issued a public statement: “Upon learning that Eldon Insurance was planning to begin a new research effort at the University of Scotland, Gov. Bryant suggested to Eldon leadership they should look into doing research at a Mississippi

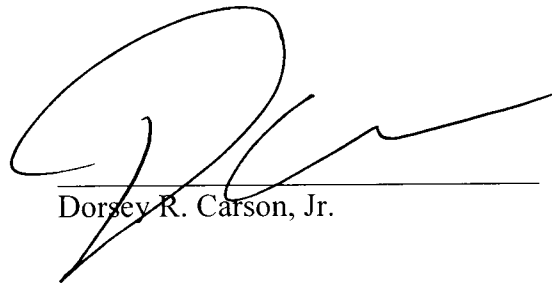
university. Ultimately, they were connected with the University of Mississippi. Gov. Bryant has full confidence in the University of Mississippi to make any decisions regarding their relationship with Eldon Insurance.”

- e. I was also made aware that Mr. Knox Graham told Mississippi Today that “upon learning that Eldon Insurance was planning to begin a new research effort at the University of Scotland, Gov. Bryant suggested to Eldon leadership they should look into doing research at a Mississippi university. Ultimately, Eldon was connected with the University of Mississippi.”
 - f. I was made aware that, on or about Thursday, April 19, 2018, the University of Mississippi, through its spokesperson Mr. Ryan Whittington, acknowledged that Eldon Insurance (and/or Big Data Dolphins) signed a lease agreement for space in the university’s Insight Park.
 - g. My independent investigation has confirmed that Big Data Dolphins (and/or Eldon Insurance) entered into a lease agreement with the University of Mississippi Research Foundation.
- 14. According to media reports, Eldon Insurance acted as a guarantor for the Big Data Dolphins group in its leasing agreement with the University of Mississippi.
 - 15. I caused a preservation of evidence letter to be sent to the University of Mississippi on Thursday, April 19, 2018. A copy of which is attached as ***Exhibit 1***.
 - 16. In response, counsel for the University of Mississippi, Mr. Perry Sansing, promptly emailed me confirming receipt on that same date. I have since spoken with Mr. Rob Jolly, an Assistant General Counsel. Upon information and belief, the University

of Mississippi has been proactive and cooperative with efforts to locate and preserve evidence, to the extent such evidence exists.

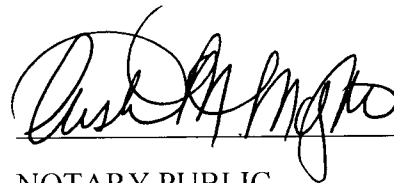
17. I conducted an online search of Eldon Insurance Services Ltd., Big Data Dolphin Ltd., and Southern Rock Insurance Company Ltd. d/b/a GoSkippy with the Mississippi Secretary of State. None of these businesses are registered with the Mississippi Secretary of State to do business in Mississippi.
18. I also conducted an online search of Eldon Insurance Services Ltd. and Southern Rock Insurance Company Ltd. d/b/a GoSkippy to determine whether those insurance companies are licensed with the Mississippi Department of Insurance. Neither of these insurance companies are licensed with the Mississippi Department of Insurance.

FURTHER AFFIANT SAYETH NOT.



Dorsey R. Carson, Jr.

Sworn to and subscribed before me this 25th day of April 2018.



NOTARY PUBLIC

My Commission Expires:





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Dorsey R. Carson, Jr.
Partner
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April 17, 2018

VIA EMAIL psansing@olemiss.edu

Perry Sansing, Esq.
General Counsel
209 Lyceum
University, Mississippi 38677

RE: Demand for Preservation of Electronically Stored Information

Dear Mr. Sansing:

The Carson Law Group, PLLC ("CLG") has the privilege of representing Let's Take Back Control Ltd. a/k/a Fair Vote Project and its director Mr. Kyle Taylor (collectively, "Fair Vote") in relation to investigations, possible illegal activities, violations and/or claims, including but not limited to data mining and privacy claims, arising out of the events more fully outlined in the recent testimonies and statements provided by Ms. Brittany Kaiser and others to the Parliament of the United Kingdom (available online) ("the Cambridge Analytica matter"), and related events.

Fair Vote demands that you preserve documents, tangible things, and electronically stored information potentially relevant to the issues in this cause. As used in this letter, "you" and "your" refers to the University of Mississippi and its departments, officers, directors, researchers, professors, teaching assistants, employees, agents, attorneys, accountants, and other persons occupying similar positions or performing similar functions.

The Cambridge Analytica matter includes but is not limited to Eldon Insurance's activities at the University of Mississippi's Insight Park, and any involvement whatsoever with the University of Mississippi, its departments, officers, directors, researchers, professors, teaching assistants, employees, agents, attorneys, accountants, and other persons occupying similar positions or performing similar functions.

You should anticipate that much of the information subject to disclosure or responsive to discovery in this cause is stored on your current and former computer systems and other media and devices (including voice-messaging systems, online repositories, and cell phones).

Electronically stored information (hereinafter "ESI") should be afforded the broadest possible meaning and includes (by way of example and not as an exclusive list) potentially relevant information electronically, magnetically, optically, or otherwise stored as:



April 19, 2018
Page 2 of 9

- Databases (e.g., Access, Oracle, SQL Server data, SAP);
- Data collections, data storage, data systems, data processes, data delivery, and other data compilations;
- Algorithms, data profiles, quantitative surveys, training sets, predictions, sample sets, and/or modeling based upon data (whether raw or processed) provided, collected, processed, stored, or otherwise existing;
- Digital communications (e.g., e-mail, texts, voice mail, instant messaging);
- E-Mail Server Stores (e.g., Microsoft Exchange .EDB or Lotus Domino .NSF);
- Cloud-based applications (e.g., ShareFile or Dropbox);
- Contact and Relationship Management Data (e.g., Outlook, ACT!);
- Calendar and Diary Application Data (e.g., Outlook PST, blog entries);
- Online Access Data (e.g., Temporary Internet Files, History, Cookies);
- Accounting Application Data (e.g., QuickBooks, Money, Peachtree data);
- Word processed documents (e.g., Word or WordPerfect files and drafts);
- Spreadsheets and tables (e.g., Excel or Lotus 123 worksheets);
- Image and Facsimile Files (e.g., .PDF, .TIFF, .JPG, .GIF images);
- Sound Recordings (e.g., .WAV and .MP3 files);
- Video and Animation (e.g., .AVI and .MOV files);
- Presentations (e.g., PowerPoint, Corel Presentations)
- Network Access and Server Activity Logs;
- Project Management Application Data;
- Computer Aided Design/Drawing Files; and
- Backup and Archival Files (e.g., Veritas, Zip, .GHO)

ESI resides not only in areas of electronic, magnetic, and optical storage media reasonably accessible to you, but also in areas you may deem not reasonably accessible. You are obliged to preserve potentially relevant evidence from both sources of ESI, even if you do not anticipate producing such ESI. **For any ESI belonging to, possessed by, or otherwise under the control of Eldon Insurance, you must preserve any such ESI that may be accessed, possessed, or otherwise available to you. Any computers, servers, and other electronic devices and information at the Eldon Insurance office must be secured.**

The demand that you preserve both accessible and inaccessible ESI is reasonable and necessary. For good cause shown, the court may order production of the ESI, even if it is not reasonably accessible. Accordingly, you must preserve ESI that you deem inaccessible so as not to preempt the court's authority.

April 19, 2018
Page 3 of 9

Preservation Requires Immediate Intervention

You must act immediately to preserve potentially relevant ESI, including, without limitation, information with the earlier of a Created or Last Modified date on or after January 1, 2017, through the date of this demand and concerning:

1. Any and all data (whether raw or processed), data collection, databases, data storage, data systems, data processes, data delivery, other data compilations, lease agreements, and files related in any way to Eldon Insurance, including but not limited to any and all statements, testimony, video or audio recordings, social media posts or messages, emails, communications, phone records (cellular, Voice Over Internet Protocol and/or landline) and any other documents or evidence regarding or related to Eldon Insurance;
2. To the extent not covered above, any and all algorithms, data profiles, quantitative surveys, training sets, predictions, sample sets, and/or modeling based upon data (whether raw or processed) provided, collected, processed, stored, or otherwise existing related to Eldon Insurance;
3. To the extent not covered above, any and all data (whether raw or processed), data collection, databases, data storage, data systems, data processes, data delivery, other data compilations, and files related in any way to Big Data Dolphins, including but not limited to any and all statements, testimony, video or audio recordings, social media posts or messages, emails, communications, phone records (cellular, Voice Over Internet Protocol and/or landline) and any other documents or evidence regarding or related to Big Data Dolphins;
4. To the extent not covered above, any and all algorithms, data profiles, quantitative surveys, training sets, predictions, sample sets, and/or modeling based upon data (whether raw or processed) provided, collected, processed, stored, or otherwise existing related to Big Data Dolphins;
5. To the extent not covered above, any and all data (whether raw or processed), data collection, databases, data storage, data systems, data processes, data delivery, other data compilations, and files related in any way to GoSkippy, including but not limited to any and all statements, testimony, video or audio recordings, social media posts or messages, emails, communications, phone records (cellular, Voice Over Internet Protocol and/or landline) and any other documents or evidence regarding or related to GoSkippy;
6. To the extent not covered above, any and all algorithms, data profiles, quantitative surveys, training sets, predictions, sample sets, and/or modeling based upon data (whether raw or processed) provided, collected, processed, stored, or otherwise existing related to GoSkippy;
7. To the extent not covered above, any and all data (whether raw or processed), data collection, databases, data storage, data systems, data processes, data delivery, other data

April 19, 2018
Page 4 of 9

compilations, and files related in any way to Leave.EU and/or Brexit, including but not limited to any and all statements, testimony, video or audio recordings, social media posts or messages, emails, communications, phone records (cellular, Voice Over Internet Protocol and/or landline) and any other documents or evidence regarding or related to Leave.EU and/or Brexit;

8. To the extent not covered above, any and all algorithms, data profiles, quantitative surveys, training sets, predictions, sample sets, and/or modeling based upon data (whether raw or processed) provided, collected, processed, stored, or otherwise existing related to Leave.EU and/or Brexit;
9. To the extent not covered above, any and all data (whether raw or processed), data collection, databases, data storage, data systems, data processes, data delivery, other data compilations, and files related in any way to Arron Banks, including but not limited to any and all statements, testimony, video or audio recordings, social media posts or messages, emails, communications, phone records (cellular, Voice Over Internet Protocol and/or landline) and any other documents or evidence regarding or related to Arron Banks;
10. To the extent not covered above, any and all algorithms, data profiles, quantitative surveys, training sets, predictions, sample sets, and/or modeling based upon data (whether raw or processed) provided, collected, processed, stored, or otherwise existing related to Arron Banks;
11. To the extent not covered in response to a request above, any and all documents, including but not necessarily limited to internal and external e-mails, text messages, instant messages, and notes with or relating to Eldon Insurance, Cambridge Analytica, Big Data Dolphins, Strategic Communications Laboratories (SCL), SCL Group, GoSkippy, Leave.EU, and/or UKIP; and/or about the Cambridge Analytica matter, or events surrounding the data and privacy investigations, prosecutions and/or use of related information, from January 1, 2017, to present:
12. To the extent not covered in response to a request above, any and all documents, including but not necessarily limited to internal and external e-mails, text messages, instant messages, and notes from meetings or conversations, relating to the Cambridge Analytica matter, and/or communications with or about Eldon Insurance, Cambridge Analytica, Big Data Dolphins, Strategic Communications Laboratories (SCL), SCL Group, GoSkippy, Leave.EU, and/or UKIP; and/or about events surrounding the data and privacy investigations, prosecutions and/or use of related information, from January 1, 2017, to present:
 - (a) any officer, researcher, professor, teaching assistant, or other employee (past or present) of the University of Mississippi;
 - (b) Cambridge Analytica;
 - (c) Big Data Dolphins;

April 19, 2018
Page 5 of 9

- (d) Strategic Communications Laboratories (SCL);
- (e) SCL Group;
- (f) GoSkippy;
- (g) Leave.EU;
- (h) Eldon Insurance;
- (i) UKIP;
- (j) Election Data;
- (k) Global Science Research (GSR);
- (l) Black Cube;
- (m) Brietbart London;
- (n) Arron Banks;
- (o) Andy Wigmore;
- (p) Matthew Richardson;
- (q) Alexander Nix;
- (r) Julian Wheatland;
- (s) Elizabeth "Liz" Bilney;
- (t) Alex Taylor;
- (u) Philip Coppel QC;
- (v) Paul Whiteley;
- (w) Harold Sansinge;
- (x) John Gill;
- (y) Ian Warren;
- (z) Alexander Kogan;
- (aa) Mike Schroepfer;
- (bb) Goodluck Jonathan;
- (cc) Facebook (data, correspondences and notes only, not posts or other social media activity);
- (s) any public or elected official; and
- (t) any newspapers, magazines, television stations, radio stations, or other media outlets, or individual reporters, interviewers, or other members of the media.

Adequate preservation of ESI requires more than simply refraining from efforts to destroy or dispose of such evidence. **You must intervene to prevent loss due to routine operations or malfeasance and employ proper techniques and protocols to preserve ESI.** Booting a drive, examining its contents or running any application may irretrievably alter the evidence it contains and constitute unlawful spoliation of evidence. Preservation requires action.

Nothing in this demand for preservation of ESI should be understood to diminish your concurrent obligation to preserve documents, tangible things and other potentially relevant evidence.

Suspension of Routine Destruction

If you have not already done so, you are directed to immediately initiate a litigation hold for potentially relevant ESI, documents and tangible things and to act diligently and in good faith to secure and audit compliance with such litigation hold. You are further directed to immediately

April 19, 2018
Page 6 of 9

identify and modify or suspend features of your information systems and devices that, in routine operation, operate to cause the loss of potentially relevant ESI. Examples of such features and operations include:

- Using data or media wiping, disposal, erasure or encryption utilities or devices;
- Purging data, databases, data storage, data systems, data processes, or other data delivery;
- Purging the contents of e-mail repositories by age, capacity or other criteria;
- Using data or media wiping, disposal, erasure or encryption utilities or devices;
- Overwriting, erasing, destroying or discarding backup media;
- Re-assigning, re-imaging or disposing of systems, servers, devices or media;
- Running antivirus or other programs effecting wholesale metadata alteration;
- Releasing or purging online storage repositories;
- Using metadata stripper utilities;
- Disabling server, packet or local instant messaging logging; and,
- Executing drive or file defragmentation or compression programs.

Guard Against Deletion

You should anticipate that your officers, employees, or others may seek to hide, destroy, or alter ESI. You must act to prevent and guard against such actions. Especially where company machines were used for Internet access or personal communications, you should anticipate that users may seek to delete or destroy information they regard as personal, confidential or embarrassing, and in so doing, they may also delete or destroy potentially relevant ESI. This concern is not unique to you. It's simply conduct that occurs with such regularity that any custodian of ESI and their counsel must anticipate and guard against its occurrence.

Preservation of Backup Tapes

You are directed to preserve complete backup tape sets (including differentials and incrementals) containing e-mail and ESI for all dates beginning on and after 1/1/2014.

Act to Prevent Spoliation

You should take affirmative steps to prevent anyone with access to your data, systems, and archives from seeking to modify, destroy, or hide ESI on network or local hard drives and on other media or devices (such as by deleting or overwriting files, using data shredding and overwriting applications, defragmentation, re-imaging, damaging or replacing media, encryption, compression, steganography or the like).

System Sequestration or Forensically Sound Imaging

As an appropriate and cost-effective means of preservation, you should remove from service and securely sequester the systems, hard drives, media, and devices housing your (Don Sansing's) potentially relevant ESI.

April 19, 2018
Page 7 of 9

In the event you deem it impractical to sequester systems, media, and devices, we believe that the breadth of preservation required, coupled with the modest number of systems implicated, dictates that forensically sound imaging of the systems, media, and devices of those named above is expedient and cost effective. As we anticipate the need for forensic examination of one or more of the systems and the presence of relevant evidence in forensically accessible areas of the drives, we demand that you employ forensically sound ESI preservation methods. Failure to use such methods poses a significant threat of spoliation and data loss.

“Forensically sound ESI preservation” means duplication of all data stored on the evidence media while employing a proper chain of custody and using tools and methods that make no changes to the evidence and support authentication of the duplicate as a true and complete bit-for-bit image of the original. The products of forensically sound duplication are called, inter alia, “bitstream images” or “clones” of the evidence media. A forensically sound preservation method guards against changes to metadata evidence and preserves all parts of the electronic evidence, including deleted evidence within “unallocated clusters” and “slack space.”

Be advised that a conventional copy, backup or “Ghosting” of a hard drive does not produce a forensically sound image because it only captures active, unlocked data files and fails to preserve forensically significant data existing in, e.g., unallocated clusters and slack space.

Once obtained, each such forensically sound image should be labeled to identify the date of acquisition, the person or entity acquiring the image and the system and medium from which it was obtained. Each such image should be preserved without alteration.

Preservation in Native Form

You should anticipate that certain ESI, including but not limited to spreadsheets and databases, will be sought in the form or forms in which it is ordinarily maintained (i.e., native form). Accordingly, you should preserve ESI in such native forms, and you should not employ methods to preserve ESI that remove or degrade the ability to search the ESI by electronic means or that make it difficult or burdensome to access or use the information.

You should additionally refrain from actions that shift ESI from reasonably accessible media and forms to less accessible media and forms if the effect of such actions is to make such ESI not reasonably accessible.

Metadata

You should further anticipate the need to disclose and produce system and application metadata and act to preserve it. System metadata is information describing the history and characteristics of other ESI. This information is typically associated with tracking or managing an electronic file and often includes data reflecting a file’s name, size, custodian, location and dates of creation and last modification or access. Application metadata is information automatically included or embedded in electronic files, but which may not be apparent to a user, including deleted content, draft language, commentary, collaboration, and distribution data and dates of creation and printing. For electronic mail, metadata includes all header routing data and Base 64 encoded attachment data, in addition to the To, From, Subject, Received Date, CC, and BCC fields.

April 19, 2018
Page 8 of 9

Metadata may be overwritten or corrupted by careless handling or improper preservation, including by moving, copying or examining the contents of files.

Servers

With respect to servers used to manage e-mail (e.g., Microsoft Exchange, Lotus Domino) and network storage (often called a “network share”), the complete contents of each user’s network share and e-mail account should be preserved. There are several ways to preserve the contents of a server. If you are uncertain whether the preservation method you plan to employ is one that we will accept as sufficient, please immediately contact the undersigned.

Home Systems, Laptops, Online Accounts and Other ESI Venues

Though we expect that you will act swiftly to preserve data on office workstations and servers, you should also determine if any home or portable systems or devices may contain potentially relevant data. To the extent that you have sent or received potentially relevant e-mails or created or reviewed potentially relevant documents away from the office, you must preserve the contents of systems, devices and media used for these purposes (including not only potentially relevant data from portable and home computers, but also from portable thumb drives, CDR/DVD-R disks and the user’s PDA, smart phone, voice mailbox, or other forms of ESI storage.). Similarly, if you used online or browser-based email accounts or services (such as Gmail, AOL, Yahoo Mail or the like) to send or receive potentially relevant messages and attachments, the contents of these account mailboxes (including Sent, Deleted, and Archived Message folders) must be preserved.

Ancillary Preservation

You must preserve documents and other tangible items that may be required to access, interpret, or search potentially relevant ESI, including logs, control sheets, specifications, indices, naming protocols, file lists, network diagrams, flow charts, instruction sheets, data entry forms, abbreviation keys, user ID and password rosters and the like.

You must preserve passwords, keys and other authenticators required to access encrypted files or run applications, along with the installation disks, user manuals and license keys for applications required to access the ESI.

You must preserve cabling, drivers and hardware, other than a standard 3.5” floppy disk drive or standard CD or DVD optical disk drive, if needed to access or interpret media on which ESI is stored. This includes tape drives, bar code readers, Zip drives and other legacy or proprietary devices.

Paper Preservation of ESI is Inadequate

As hard copies do not preserve electronic searchability or metadata, they are not an adequate substitute for, or cumulative of, electronically stored versions. If information exists in both electronic and paper forms, you should preserve both forms.

Agents, Attorneys and Third Parties

Your preservation obligation extends beyond ESI in your care, possession, or custody and includes ESI in the custody of others that is subject to your direction or control. Accordingly, you must notify any current or former agent, attorney, employee, custodian, and contractor in

April 19, 2018
Page 9 of 9

possession of potentially relevant ESI to preserve such ESI to the full extent of your obligation to do so, and you must take reasonable steps to secure their compliance.

Preservation Protocols

We are desirous of working with you to agree upon an acceptable protocol for forensically sound preservation and can supply a suitable protocol if you will furnish an inventory and description of the systems and media to be preserved. Alternatively, if you promptly disclose the preservation protocol you intend to employ, perhaps we can identify any points of disagreement and resolve them. A successful and compliant ESI preservation effort requires expertise. If you do not currently have such expertise at your disposal, we urge you to engage the services of an expert in electronic evidence and computer forensics. Perhaps our respective experts can work cooperatively to secure a balance between evidence preservation and burden that's fair to both sides and acceptable to the court.

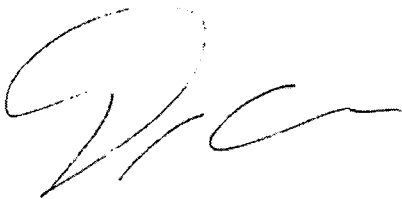
Do Not Delay Preservation

I'm available to discuss reasonable preservation steps; however, you should not defer preservation steps pending such discussions if ESI may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Confirmation of Compliance

Please confirm that you have taken the steps outlined in this letter to preserve ESI and tangible documents potentially relevant to this action. If you have not undertaken the steps outlined above, or have taken other actions, please describe what you have done to preserve potentially relevant evidence.

Very truly yours,

A handwritten signature in black ink, appearing to read 'DRC', with a stylized flourish extending to the right.

Dorsey R. Carson, Jr.
DRC/sem

**Written testimony to the Fake News Inquiry***Brittany Kaiser*

I want to thank the British Parliament for this opportunity to bear witness to the inquiry on Fake News. As a believer in truth, universal human rights and democracy, I understand that fake news undermines these ideals and threatens everything we hold dear, but it is just a symptom of a deeper problem. The elite have spent too many years using technology to take advantage of the people's openness and goodwill. I can no longer stand by while the privileged abuse their power, intentionally or unintentionally. I want to help shed light in dark places, and to help people be more responsible in their actions. This is why I spoke out originally, and this is why I have returned to the UK willingly and at my own expense to testify to this inquiry.

As a matter of background, I was born in Houston, Texas, and grew up in Chicago. I went to high school at Phillips Academy Andover outside of Boston, then moved to Edinburgh to study two of my lifelong passions: international relations and human rights. During my academic studies, I volunteered on the presidential campaign of Howard Dean and the senatorial campaign of Barack Obama, before becoming part of the small new media team on Obama's presidential campaign in 2007/8.

I then spent several years working on human rights projects around the world, including work for Amnesty International, lobbying at the United Nations and European Parliament to stop crimes against humanity, and contributing to human rights research projects in Asia; while pursuing further postgraduate degrees in human rights law, diplomacy and development. I began to focus on how social change projects could become more effective, for example through data-driven early warning systems against genocide. I also worked on international trade and development, and worked around the world as a freelance political consultant.

I first met Alexander Nix when I was working with Democrats Abroad in London. I think it was 2013. Friends of ours thought it would be a good joke to introduce us as he was consulting to the Republican Party. He was very interested in learning more about my experience with the Democrats. He gave me his card and said, "Let me get you drunk and steal your secrets". I didn't call him.

We met coincidentally a few times after that; and in December 2014, he offered me a job. I wanted to find a way to be more effective in campaigning and positive social change, and his firm Strategic Communications Laboratories (SCL) boasted of scientifically valid methods of measuring effectiveness. I have always wanted us to use power for good, not ill. The first project I worked on with SCL was on driving engagement for reconstruction of ebola-stricken countries.

I began at SCL Group as a part-time consultant with the title of special adviser. I became full-time in February 2015, and left in January 2018. My job title was left to me. My focus was on sales and business development, a field in which titles are often inflated. I called myself Director of Program Development initially; this then changed to Director of Business Development.

At no time was I part of the executive leadership or top management team of SCL or Cambridge Analytica - although I wanted to be, and I believe I contributed hugely to the success of the company. I was never an officer of the board of any of the companies. I was also not a data scientist or someone with access to controversial datasets. Since I left, I have been learning just how many secrets the management team were keeping me out of, and looking back with fresh eyes on emails I was copied in to and other documents.

My job at Cambridge Analytica was primarily to meet potential clients, hear what they wanted and required, and brief the operations team in order to produce a sales proposal, often under the guidance of senior managers and executives like CEO Alexander Nix, CFO/COO Julian Wheatland, and Chief Data Officer Alex Tayler. I had access to company materials on products and services, account management, and to potential and current clients.

My testimony here is informed by what I witnessed and experienced during my time at Cambridge Analytica and SCL, and materials I worked on or was copied in to. When I originally spoke to The Guardian in March 2018, I provided relevant materials from my Cambridge Analytica inbox. I was locked out of my files, but later found an offline copy of my SCL inbox with further materials.

I would now like to submit the following specific testimony and supporting packages of evidence:

Brexit, UKIP & Eldon Insurance

Cambridge Analytica was initially engaged with Arron Banks, Andy Wigmore and Matthew Richardson to design parallel proposals for Leave.EU, GoSkippy/Eldon Insurance and the UK Independence Party. I was asked by Nix and Wheatland to take the lead on contract negotiations. I believe this is because, as upper class Brits, they did not want to front up the deal with him themselves. Banks was excited to discover my background with the Obama campaign.

Over a period of five months, we undertook both meetings and work at the Bristol headquarters of Eldon Insurance, the SCL Group offices in Mayfair, and the Leave.EU London offices in Millbank Tower, as well as a press launch and media engagements. Our work for UKIP/Leave.EU was never reported to the Electoral Commission by the party, the campaign, or our company.

At the time, I didn't see anything wrong in what was being proposed. I am not a data lawyer or an expert in UK elections law; and we included caveats in our proposals about requiring legal advice before proceeding with some elements of the project. Arron Banks said, "It's my data" – it seemed natural that he would use it across his initiatives. I was also reassured by a legal opinion arranged by former UKIP party secretary Matthew Richardson from Philip Coppel QC to UKIP and Cambridge Analytica, an opinion which Richardson co-signed in a manner which seems somewhat unorthodox in retrospect. I am providing this document now to Parliament.

In hindsight, I now think that there is reason to believe that misuse of data was rife amongst the businesses and campaigns of Arron Banks. If the personal data of UK citizens who just wanted to buy car insurance was used by GoSkippy and Eldon Insurance for political purposes, as may have been the case, people clearly did not opt in for their data to be used in this way by Leave.EU. I have similar concerns about whether UKIP members consented to the use of their data.

For example, I went to Bristol with a senior data scientist to spend the day with the Leave.Eu team. We started the work day by presenting to the heads of every department (social media, call center, IT/data, creative, events) to show them how Cambridge Analytica uses data and would be supporting the Leave.Eu campaign. After the general presentation we went to work with each department to assess which kinds of data they had,

how they were being used and what kinds of capacity the team possessed. When we were with the call center team, we enquired on the databases being used for the calls, which I was told were from the insurance company. It seemed to me that the datasets and the staff were being used for Eldon/GoSkippy Insurance as well as Leave.eu in parallel.

Arron Banks refused to pay our phase 1 bill of £41,500 for work undertaken, despite what I was told by Julian Wheatland was a firm commitment by Leave.EU chief executive and Banks associate Liz Bilney to do so. I have no memory of seeing or hearing about the invoice later sent to UKIP for this work, which has recently been revealed in the media. I understand that Banks made a donation of £42,000 to UKIP a week before the referendum vote, perhaps to tidy things up. But I had and have no evidence around this; and I understand that no payment was ever made to Cambridge Analytica by UKIP. To the best of my knowledge, our work with UKIP and Leave.EU never made it into any report to the Electoral Commission.

Finally, I was recently made aware of a data company set up by Arron Banks called "Big Data Dolphins", soon after he ceased negotiations with Cambridge Analytica and declined to pay our phase 1 bill.

This company has reportedly worked with a data science team at the University of Mississippi (Ole Miss). If the Mississippi team has held or processed UK citizens' data in the US, I believe that is likely to be a criminal offence; although it is for the empowered authorities to pursue any such question and secure the associated evidence.

In retrospect, based on what I now know, I believe that Arron Banks and Andy Wigmore have serious questions to answer. They should perhaps themselves be summoned to testify before Parliament. I do not believe Banks's written evidence to this inquiry is a full account of what happened. I also hope that evidence can be preserved.

I am submitting the following supporting materials on Brexit to the inquiry:

1. GoSkippy Proposal and supporting emails
 - a. GoSkippy original proposal document
 - b. GoSkippy1 email thread regarding scheduling a follow up meeting at Leave.EU offices in Bristol, where I write on January 8, 2016: *"I recall before the holidays we spoke about Aaron being available in Bristol next week on Wednesday and Thursday the 13/14. Are these dates still a possibility? My team does not mind coming down to Bristol as we have pending meetings with other members of the Leave.EU teams as well as GoSkippy departments."*
2. Phase 1 & 2 Leave.EU Proposal and supporting emails
 - a. See Leave.EU original proposal outlining Phase 1 & Phase 2 work streams
 - b. See Leave.EU follow up proposal, following a request from Banks to combine/correlate work streams with Eldon Insurance and UKIP
 - c. Email **Leave1** dated Dec 5, 2015, from Julian Wheatland to Liz Bilney, confirming Arron Banks and Leave.EU's intent to have Cambridge Analytica create a joint data program for Leave.EU, UKIP and the insurance company, as well as to initiate a fundraising program: *"Thanks for coming into see us yesterday – it was a pleasure to meet you and it sounds like we are on the right track. As we discussed, we will make sure that the Target Audience*

Analysis (TAA) suits the purposes of Leave as well as UKIP and we will try to seed some questions into the survey that will help inform future study of insurance risk profiling. Once we have completed the TAA and matched it to the Experian data we will be in a position to start microtargeting and, at that time, we would propose that we start digital outreach and a program of voter engagement and fundraising. However, following our discussion yesterday on the way you are using Facebook (and chatting it over with our Head of Digital Marketing afterwards), it occurred to me that you may like us to take over your current list-building activity in the interim. From what you've said, I'm certain we could improve the effectiveness and yield from current activities and that would give us a stronger base for the fundraising programme in the New Year."

- d. Email **Leave2**, I write to confirm with Julian Wheatland that our budget is approved by Leave.EU as follows: *"In your last full chats with Liz, she said the budget was approved and we were awaiting approval for the payment schedule, etc, is that correct? Anyhow, would you like me to contact Frances, whom I've been liaising with on Aaron's schedule, to get something in the calendar for the week of January 4th?"* His response is *"Yes that's correct and yes please."*
- e. Email thread **Leave3**, Pierre Shepard, Leave.EU Head of Research, writes to Cambridge Analytica on Dec 11, 2015 to ask when we will have demographic data available for their usage: *"could you give me an indication of when we will have some demographic data. I was under the impression that it would not be for a while, but I've been informed otherwise."* After our team liaising with Leave.EU back and forth, he confirms that some access has been given to campaign materials and/or data: *"I've spoken to Andy in graphics. As far as he can tell, you have all the information/access you need. Please advise on where to go from here. Brittany and David, do you still plan to come next week?"*
- f. Email thread **Leave4** from Ian Warren at Election Data, as a consultant to Leave.EU sharing election data and insights with Cambridge Analytica as part of the Leave.EU team: *"Please find attached the first of five reports on the Labour vote. As you will see the report includes detailed analysis of demographic characteristics and political behaviour. There is an Executive Summary at the beginning if the full report is too long to consume. This first report is one of five I will produce:*

- 1. Blue collar working households (attached)*
- 2. Struggling, financially strapped households*
- 3. Young, metropolitan liberals*
- 4. Current students*
- 5. Ethnic minorities*

Each of these groups have distinct demographic characteristics, personality traits and political behaviours. They will require subtly different messaging as a result. Julian and the team at Cambridge and I had a productive meeting in London before Christmas and I hope this report will start to flesh this out."

- g. Please see document titled **"Labour vote briefing 1/5"** shared with Cambridge Analytica and Leave.EU on January 6, 2016

- h. Please see document titled “**Labour vote briefing 2/5**” shared with Cambridge Analytica and Leave.EU on January 8, 2016
- 3. UKIP rebranding proposal and supporting emails:
 - a. Please see UKIP rebranding proposal
 - b. Email **UKIP1** dated Nov 27 2015 - Confirmation that we have analyzed the UKIP membership dataset and are working on a proposal to include the appending of commercial data for further insights these members.
 - c. Email **UKIP2**: An email exchange between myself and Leave.EU leadership confirming our time at Bristol HQ of Eldon Insurance/Leave.EU to assess data sources and campaign capacity.
 - d. Email **UKIP3** dated Dec 7, 2015, reconfirming the analyzing of UKIP’s membership data, and the party using the results in presentations: *“Here is a presentation that was given to UKIP’s NEC about the results from the survey which David analysed. John Gill, the party’s press director sent it over from a conversation we were having.”*
 - e. UKIP Doc1 - Please see presentation from late October 2015 by Matthew Goodwin, Paul Whiteley and Harold Clarke, forwarded by John Gill, UKIP official, based on the analysis done by Cambridge Analytica on UKIP membership and survey data.
- 4. Legal opinion from Philip Coppel QC and Matthew Richardson to UKIP and Cambridge Analytica

1. Facebook data issues

I am not a data scientist, and I never handled Cambridge Analytica’s data models or any significant datasets myself. I have been shocked by the testimony to this committee on this topic and the growing number of reports about how Facebook data was abused by Alexander Kogan, Global Science Research and Cambridge Analytica without users’ consent, and even more shocked about Facebook’s own failures to protect their users’ data.

I only heard through the media about the specifics of the Facebook research project undertaken in 2014 by Alexander Kogan, both through an initial Guardian article in December 2015 and through the most recent revelations. The research took place before I joined SCL, and I never met Kogan. I can answer questions on this topic but have no special knowledge of the datasets or their acquisition.

I can say that I was concerned about what I read in the media in 2015, and was assured by company executives in January that they had taken appropriate action to comply with the law and contractual requirements, including deleting all Facebook data. But it’s important also to emphasise that during most of my time at Cambridge Analytica, the culture and assumptions of the firm and the wider data brokerage and ad tech industries within which it operated were a bit “Wild West”, with citizens’ data being scraped, resold and modelled willy-nilly. I have gained further understanding and perspective on these issues in recent weeks. I do believe I have evidence of CA obtaining, retaining and using these datasets, seemingly in contravention of legal obligations.

This is why I launched the #OwnYourData campaign at the start of April, challenging Mark Zuckerberg to alter Facebook's terms of service to give users more rights over the use and monetisation of their own data. The petition I started for the campaign on Change.org now has 147,000 signatures. We have asked Zuckerberg to respond by 30th April. I would encourage the Select Committee to ask Facebook's CTO Mike Schroepfer about these issues, and am happy to provide further briefing and a list of suggested questions.

I want to address a few specific details about Facebook data issues:

- a) Access to Facebook data was a part of Cambridge Analytica's sales and marketing "pitch" to commercial, political and defence clients throughout my time at the company – even after the request from Facebook to delete the data.
- b) I never had access to the Kogan/GSR dataset on 87 million friends, or to any other sophisticated Facebook dataset; I how it had been acquired, and I was told by company leadership that Cambridge Analytica was complying with the law and with Facebook's requirements at all times.
- c) In May 2015, Cambridge Analytica's current Chief Data Officer asked for me and two other colleagues to look through a list of Facebook groups and choose 500 of them to receive data related to the people who had liked those groups. I was told this was one of our last chances to get Facebook data. I believe now that this is later than the publicly stated date of April 2015 when the API loophole was announced to be closed.]
- d) As I told *The Guardian* in March 2018, I was forwarded emails between CA's Chief Data Officer and Facebook in December 2015 and January 2016. Facebook asked if we still possessed the Kogan/GSR datasets; our CDO confirmed that we did; Facebook asked for them – and any models derived from these datasets – to be destroyed. The CDO then told Facebook that the data had been deleted. Following statements from former CA employees, I am now asking questions about whether this was the case.
- e) I have since found another email dating from March 2016 in which another of our senior data scientists confirmed in writing that we were using some Facebook likes for modeling, two months after we confirmed that these data were deleted.
- f) I should emphasise that the Kogan/GSR datasets and questionnaires were not the only Facebook-connected questionnaires and datasets which Cambridge Analytica used. I am aware in a general sense of a wide range of surveys which were done by CA or its partners, usually with a Facebook login – for example, the "sex compass" quiz. I do not know the specifics of these surveys or how the data was acquired or processed. But I believe it is almost certain that the number of Facebook users whose data was compromised through routes similar to that used by Kogan is much greater than 87 million; and that both Cambridge Analytica and other unconnected companies and campaigns were involved in these activities.

Documents include:

- 1. Email requests
- 2. Attachment of group lists
- 3. Attachment of chosen groups

4. Email correspondence in response to Facebook's notice of the need to delete data
5. Email correspondence confirming we still use facebook likes for modeling

Nigeria campaign

There have been various reports regarding a short communications project undertaken in Nigeria in 2015 in support of Goodluck Jonathan and in opposition to the candidacy of Muhamadu Bukhari. I was involved in securing this contract for the SCL Group and liaising with the client in the beginning of the engagement, and in a specific part of the project with lawyers highlighting historic human rights abuses. I never visited Nigeria during this project. I am submitting the campaign portfolio of all materials produced and used in this Cambridge Analytica campaign in Nigeria.

My only other involvement was in response to a specific and persistent request from the client, for opposition research services which I understood Cambridge Analytica did not themselves provide. At the client's request, I made additional inquiries, identified a suitable research company which might be able to deliver effective opposition research, and introduced the client to them. Contrary to some media reports, this company was not called Black Cube. There was then one meeting between Cambridge Analytica staff and representatives of that company. I should emphasise that opposition research is a fairly standard part of political campaigns in most countries, and is often conducted by people with backgrounds in government service.

Documentation:

- NIS Campaign portfolio - images, videos and press articles in full

Breitbart data

In reviewing the events around the Brexit campaign, I was recently reminded of the fact that the Breitbart media platform had a UK channel, "Breitbart London", in which UKIP-linked figures played key roles. One of Cambridge Analytica's competitive advantages in the US marketplace in 2016, and a key part of our pitch to Republican clients, was that we had secured exclusive rights to resell Breitbart engagement data. This meant that we had at least some access to what tens of millions of Americans were reading on Breitbart, and could feed this data into our campaign models to help predict resonant issues - and to influence behaviour. Breitbart became one of the biggest media platforms in the US in 2016, and its stories often went viral on Facebook.

I am not aware of any such agreement or data sharing in relation to Breitbart London, but it would be interesting to know if our US data tracking tags were in place on that UK channel, and whether any data about what stories British people were reading on Breitbart or other websites ever made their way to Leave campaigns.

Documentation:

- Breitbart data email

Conclusion

When I decided to expose abuses of data and electoral law last month, I also decided I wanted to share key pieces of information with parliamentarians and the authorities. I have returned to the UK specifically to do this, of my own free will and at my own expense, to support the work of the Fake News Inquiry and the Information Commissioner's Office. I have a busy schedule in the coming weeks, but am more than willing to answer further specific questions in the future.

Governments, private companies and wealthy individuals have long had the opportunity to buy, license and collect our datasets. The past decade has seen a rampant rise of this data collection and modelling, targeting individuals to sell products, services and political ideology. I know this all too well, as a data rights campaigner and former employee of Cambridge Analytica.

Privacy has become a myth, and tracking people's behavior has become an essential part of using social media and the internet itself; tools that were meant to free our minds and make us more connected, with faster access to information than ever before. Instead of connecting us, these tools have divided us. It's time to expose their abuses, so we can have an honest conversation about how we build a better way forward.

I appreciate the opportunity to have given this testimony to Parliament. These are little-known areas which people are only just beginning to understand. I believe that shining a light on historic abuses, whether illegal or illegitimate, can help us forge a new social contract in which we use our wealth of data for good, instead of exploitation.

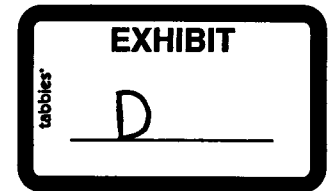
That's why I am calling through the #OwnYourData campaign for individual data to be protected as property, where we each have sensible permission structures, the right to make our data portable, and to monetize it for our own basic needs and freedoms.

No longer should the powerful be allowed to monopolise control over our data, the headlines, and the power that these communications tools wield. Let us move forward together, for prosperity, truth, rights and freedom.

GOVERNMENT

Gov. Bryant linked Ole Miss with scrutinized British data firm

BY ADAM GANUCHEAU  APRIL 19, 2018



Arron Banks Twitter post

Gov. Phil Bryant poses with Lord Michael Ashcroft, left, Andy Wigmore, and Arron Banks at the football stadium on the Ole Miss campus last November.

Gov. Phil Bryant used his friendships with Brexit leaders to help a data firm – whose business practices are being investigated in the United Kingdom – do business with the University of Mississippi.

Bryant's office referred U.K.-based Eldon Insurance Services to the university's business incubator Insight Park. Eldon, along with a firm called Big Data Dolphins, are owned by a British businessman named Arron Banks.

Banks, who bankrolled the campaign for the U.K. to leave the European Union in 2016 (commonly referred to as "Brexit"), is being investigated by several British government agencies (<https://www.politico.eu/article/cambridge-analytica-facebook-data-brittney-kaiser-privacy/>), about his use of individuals' data during that campaign. Connections also are being scrutinized between the group and Cambridge Analytica, the company that allegedly stole millions of Facebook users' personal data to help influence the 2016 U.S. presidential campaign.

Cambridge Analytica whistleblower Brittany Kaiser testified before British Parliament this week that Banks' insurance company Eldon Insurance Services and his data firm Big Data Dolphins was working with "a data science team at the University of Mississippi" after Banks cut off data contract negotiations with Cambridge Analytica.

Kaiser claimed the University of Mississippi researchers could have held or processed U.K. citizens' data outside of the country, a possible criminal offense.

University of Mississippi spokesman Ryan Whittington downplayed any connection this week, saying the university "has neither received nor analyzed any data from Big Data Dolphins Limited or Eldon Insurance Services Limited or any entities affiliated with these companies."

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"No research or educational relationship has been established with either of these companies and the space is not occupied," Whittington told Mississippi Today. "Any proposed research agreement between UM and an external entity is always carefully vetted by the university to ensure compliance with all applicable laws and policies."

Details of Banks' ties to the university were first reported by Magnolia State Live

(<http://magnoliastatelive.com/brexit-bankroller-arron-banks-launched-data-firm-oxford-mississippi/>).

Kaiser testified before British Parliament this week about Cambridge Analytica's involvement with Leave.EU, the Brexit campaign group Banks co-founded in 2015. Kaiser said she worked with Banks and his associate, Andy Wigmore, to develop parallel proposals for Leave.EU, the U.K. Independence Party and Banks' insurance firm Eldon Insurance.

Kaiser said that she saw campaign staffers using individuals' personal data

(<https://www.theguardian.com/politics/2018/apr/17/arron-banks-staff-worked-on-brexit-campaign-mps-told>) from Eldon Insurance and accused the organization of potentially misusing personal data for political gain. News outlets across the U.K. have reported that use of data would violate the nation's Data Protection Act, though Banks this week denied the overlap of data usage (<https://www.theglobeandmail.com/world/article-brexit-backer-arron-banks-denies-allegation-he-misused-data-in/>).

"If the personal data of U.K. citizens who just wanted to buy car insurance was used by GoSkippy and Eldon Insurance for political purposes, as may have been the case, people clearly did not opt-in for their data to be used in this way by Leave.EU," Kaiser said this week.

Leave.EU attacked Kaiser's evidence as "a confused litany of lies and allegations" and said that Eldon Insurance did not share data with anyone, according to a Guardian report. "No data has been sent to Mississippi. The unit is still in the planning stage, it employs no one and is not operational," the group said.

In a interview earlier this year (<https://www.byline.com/column/67/article/2073>), Wigmore said University of Mississippi data scientists would help develop the Big Data Dolphins model, saying they "met the faculty because they knew the state governor, who they had, in turn, met through their 'Brexit journey which led them to Trump.'"

The university confirmed on Wednesday that Bryant facilitated the relationship between Banks and the university. Wittington, the Ole Miss spokesman, said, "The governor's office referred Eldon Insurance Services (Banks' company) to the university's research park, as a possible economic development project."

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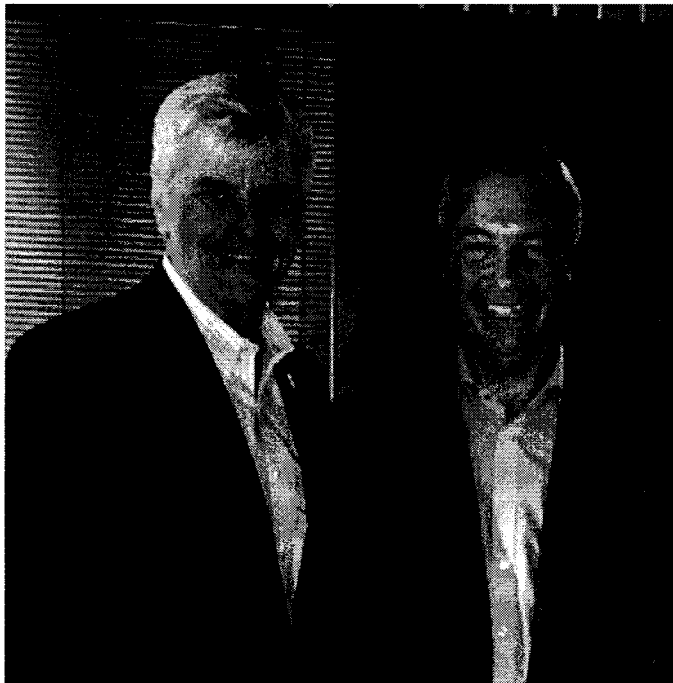
A spokesman for Bryant, Knox Graham, told Mississippi Today that “upon learning that Eldon Insurance was planning to begin a new research effort at the University of Scotland, Gov. Bryant suggested to Eldon leadership they should look into doing research at a Mississippi university. Ultimately, Eldon was connected with the University of Mississippi.”

“Gov. Bryant has full confidence in the University of Mississippi to make any decisions regarding their relationship with Eldon Insurance,” Graham said in an emailed statement.

Graham noted that “Gov. Bryant has been in London this week for the Commonwealth Business Forum focusing on economic development efforts for the State of Mississippi.” On the Paul Gallo radio show on Wednesday Bryant noted that he facilitated a deal that brought “an insurance business” to Oxford.

“It’s an amazing opportunity for Mississippi in an environment looking forward to Brexit and the trade opportunity it will give the United States,” Bryant said. “You bring your business to Mississippi — we already have our first one coming to Oxford, we’ll talk about that later. It’s an insurance business.”

Bryant has deep ties with the major players involved, as chronicled in Banks’ 2017 book called “The Bad Boys of Brexit” and reported by Mississippi Today.



Twitter

Gov. Phil Bryant, left, poses with Nigel Farage during the Brexit leader’s visit to Mississippi in 2016.

The governor and Brexit leader Nigel Farage struck up a friendship after a chance meeting in Cleveland, Ohio, for the 2016 Republican National Convention. The peculiar relationship led to the governor introducing Farage with then-presidential candidate Donald Trump in Jackson in 2016.

In his book, Banks calls that first Mississippi trip “one of the most extraordinary political journeys in Farage’s long career of extraordinary political journeys.”

Bryant has since hosted the Brexit leaders in

Mississippi several times and has regularly appeared on Farage’s radio show in London.

During an Ole Miss football game on Nov. 2, 2017, Bryant was in the stadium’s luxury skyboxes with Banks, Wigmore and British billionaire Michael Ashcroft. Lord Ashcroft even fired off the on-field cannon used when Ole Miss scores a touchdown, according to his Twitter post.

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Mississippi Governor Steered Data Firm to University

Mississippi's governor referred two British businessmen to the University of Mississippi to develop their company modeled on Cambridge Analytica.

April 20, 2018, at 11:50 a.m.

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AP

OXFORD, Miss. (AP) — Mississippi (/news/best-states/mississippi)'s governor referred two British businessmen to the University of Mississippi to develop their data analysis company modeled on Cambridge Analytica.

The Oxford Eagle reports the company, Big Data Dolphins, has leased space in the university's research park.

University officials tell the Clarion Ledger the space remains vacant and that Ole Miss hasn't signed any research agreement with the company.

Republican Gov. Phil Bryant has cultivated friendships with supporters of the United Kingdom's exit from the European Union. Some have ties to Cambridge Analytica.

Cambridge Analytica is alleged to have used data from Facebook accounts to aid President Donald Trump's 2016 campaign. Former employee Brittany Kaiser testified about the Mississippi link Tuesday before the U.K. Parliament.

The university denies receiving or analyzing data from Big Data Dolphins or Cambridge Analytica.

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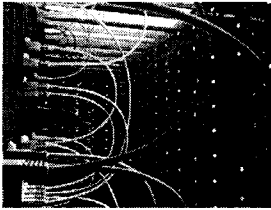
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Gov. Phil Bryant introduced Brexit firm with Cambridge Analytica link to Ole Miss

Bracey Harris, Clarion Ledger

Published 11:53 a.m. CT April 19, 2018 | Updated 1:57 p.m. CT April 19, 2018



(Photo: Getty Images)

A British firm that allegedly replicated Cambridge Analytica's controversial data mining tactics set up shop at the University of Mississippi after consulting with Gov. Phil Bryant, a spokesman for the Governor's Office confirmed Thursday.

Cambridge Analytica is the political data analysis firm hired by President Donald Trump's 2016 campaign that gained access to private information on more than 50 million Facebook users without their permission.

Brittany Kaiser, the former business development director for Cambridge Analytica, testified Tuesday before the British Parliament that the University of Mississippi partnered with a British group, Eldon Insurance, to use

Facebook user data to create a new data research firm called Big Data Dolphins.

The online news website Magnolia State Live first reported (<http://magnoliastateline.com/brexit-bankroller-arron-banks-launched-data-firm-oxford-mississippi/>) the news Thursday morning that Bryant had suggested that Andrew Wigmore, communications director for the Leave.EU, the organization that successfully campaigned in 2016 for Britain to leave the European Union, set up the arrangement at Ole Miss.

The Clarion Ledger has previously reported on Bryant's friendship with Brexit backers, including U.K. Independence Party Leader Nigel Farage, whom Trump called "Mr. Brexit."

Upon learning that Eldon Insurance was planning to begin a new research effort at the University of Scotland, Gov. Bryant suggested to Eldon leadership they should look into doing research at a Mississippi university," Knox Graham, a spokesman for Bryant said in a statement. "Ultimately, they were connected with the University of Mississippi. Gov. Bryant has full confidence in the University of Mississippi to make any decisions regarding their relationship with Eldon Insurance."

Eldon Insurance acted as a guarantor for the Big Data Dolphins group in its leasing agreement with Ole Miss.

Testifying before Parliament as to whether Cambridge Analytica was involved with the Leave.EU campaign, Kaiser said the company merely made a pitch but never worked for the group.

More: [New Brexit book: Bryant arranged Trump-Farage hookup \(/story/news/politics/2016/11/15/bryant-trump-farage/93898020/\)](#)

However, Kaiser also said that two Leave.EU leaders took the idea of her pitch and used data from two insurance companies to partner with Ole Miss and start their own company.

"Arron Banks and Andy Wigmore have told multiple individuals that they took my proposal and copied it and they created their own Cambridge Analytica, which they called Big Data Dolphins in partnership with the data science department at the University of Mississippi," Kaiser said.

She told lawmakers that, in an atmosphere where data abuse was rife, she believed the leadership of the Leave.EU campaign combined data from members of the U.K. Independence Party and from the customers of two insurance companies, Eldon Insurance and GoSkippy Insurance.

The university rejected Kaiser's allegation.

"The assertion that the University of Mississippi has received or analyzed any data from these companies is not true," Alice Clark, vice chancellor for university relations, said in a statement emailed Tuesday to The Associated Press.

On Wednesday, however, the university acknowledged that it had leased a space to Big Data Dolphins Ltd. in the university's research park, Insight Park, in February.

"Space in the research park is leased to outside entities based on the expectation of establishing a research or educational relationship with the university," spokesman Ryan Whittington said in a statement. "No research or educational relationship has been established with either of these companies and the space is not occupied. Any proposed research agreement between UM and an external entity is always carefully vetted by the university to ensure compliance with all applicable laws and policies."

4/20/2018

Gov. Phil Bryant introduced Brexit firm now under scrutiny to Ole Miss

Wigmore, also called Kaiser's statements a "litany of lies."

Case: 25CH1:18-cv-00612 Document #: 2 Filed: 04/25/2018 Page 54 of 59

Thursday morning the online news website magnoliastateline.com reported (<http://magnoliastateline.com/brexit-bankroller-arron-banks-launched-data-firm-oxford-mississippi/>) that Gov. Phil Bryant suggested that Wigmore set up the arrangement at Ole Miss.

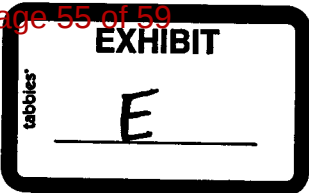
The Associated Press contributed to this report.

This story will be updated.

Contact [Bracey Harris](https://www.clarionledger.com/staff/10043648/bracey-harris/) (<https://www.clarionledger.com/staff/10043648/bracey-harris/>) at 601-961-7248 or bharris2@gannett.co (<mailto:bharris2@gannett.co>)m. Follow her on [Twitter](https://twitter.com/BraceyHarris) (<https://twitter.com/BraceyHarris>).

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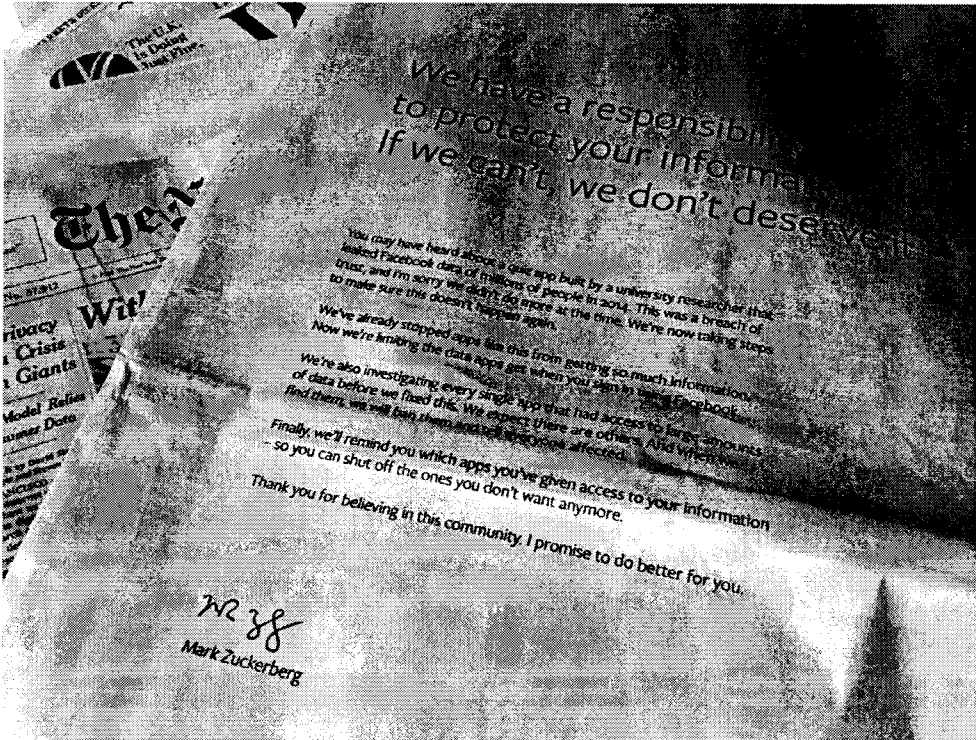
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LISTEN LIVE

Cambridge Analytica ex-CEO refuses to testify in UK

Associated Press Tuesday, April 17, 2018



Credit: The Associated Press

FILE - A Sunday, March 25, 2018 file photo shows an advertisement in The New York Times is displayed, in New York. University of Essex lecturer and propaganda expert Emma Briant says Cambridge Analytica helped Donald Trump's presidential campaign use false statements and anti-Muslim messages to spread fear and resentment in swing states he needed to win. (AP Photo/Jenny Kane, File)

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LONDON — Cambridge Analytica's ex-CEO, Alexander Nix, has refused to testify before the U.K. Parliament's media committee, citing British authorities' investigation

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into his former company's alleged misuse of data from millions of Facebook accounts in political campaigns.

Committee Chairman Damian Collins announced Nix's decision a day before his scheduled appearance but flatly rejected the notion that he should be let off the hook, saying Nix hasn't been charged with a crime and there are no active legal proceedings against him.

"There is therefore no legal reason why Mr. Nix cannot appear," Collins said in a statement. "The committee is minded to issue a formal summons for him to appear on a named day in the very near future."

Nix gave evidence to the committee in February, but was recalled after former Cambridge Analytica staffer Christopher Wylie sparked a global debate over electronic privacy when he alleged the company used data from millions of Facebook accounts to help U.S. President Donald Trump's 2016 election campaign. Wylie worked on Cambridge Analytica's "information operations" in 2014 and 2015.

Wylie has also said the official campaign backing Britain's exit from the European Union had access to the Facebook data.

Cambridge Analytica has previously said that none of the Facebook data it acquired from an academic researcher was used in the Trump campaign. The company also says it did no paid or unpaid work on the Brexit campaign. The company did not respond to requests for comment from The Associated Press on Tuesday.

The Information Commissioner's Office said Tuesday that it had written to Nix to "invite him" to be interviewed by investigators. The office is investigating Facebook and 30 other organizations over their use of data and analytics.

"Our investigation is looking at whether criminal and civil offences have been committed under the Data Protection Act," the office said in a statement.

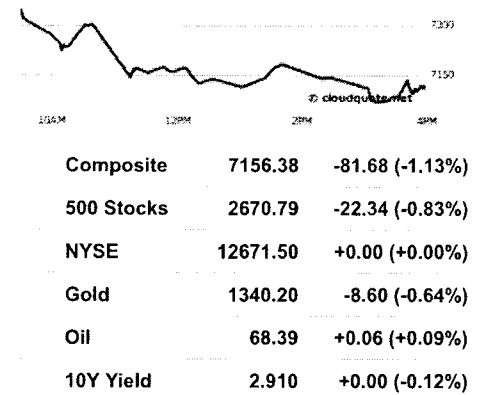
Nix's refusal to appear comes as the seriousness of the British inquiry becomes more evident.

Facebook has said it directed Cambridge Analytica to delete all of the data harvested from user accounts as soon as it learned of the problem.

But former Cambridge Analytica business development director Brittany Kaiser testified Tuesday that the U.S. tech giant didn't really try to verify Cambridge Analytica's assurances that it had done so.

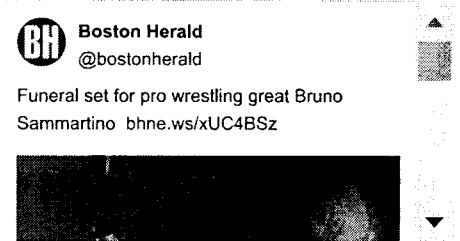
"I find it incredibly irresponsible that a company with as much money as Facebook ... had no due diligence mechanisms in place for protecting the data of U.K. citizens, U.S. citizens or their users in general," she said.

Kaiser suggested that the number of individuals whose Facebook data was misused could be far higher than the 87 million acknowledged by the Silicon Valley giant.



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She told lawmakers that in an atmosphere where data abuse was rife, she believed the leadership of the Leave.EU campaign combined data from members of the U.K. Independence Party and from the customers of two insurance companies, Eldon Insurance and GoSkippy Insurance.

The two executives were then able to create their own "their own Cambridge Analytica" using her proposals, Kaiser testified.

"Arron Banks and Andy Wigmore have told multiple individuals that they took my proposal and copied it and they created their own Cambridge Analytica, which they called Big Data Dolphins in partnership with the data science department at the University of Mississippi," Kaiser said.

The university rejected Kaiser's allegation.

"The assertion that the University of Mississippi has received or analyzed any data from these companies is not true," Alice Clark, vice chancellor for university relations, said in a statement emailed Tuesday to The Associated Press.

Leave.EU's communications director, Andy Wigmore, also called Kaiser's statements a "litany of lies."

It is how the data was used that alarms some members of the committee and has captured the attention of the public.

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An expert on propaganda told the committee Monday that Cambridge Analytica used techniques developed by the Nazis to help Trump's presidential campaign, turning Muslims and immigrants into an "artificial enemy" to win support from fearful voters.

University of Essex lecturer Emma Briant, who has for a decade studied the SCL Group — a conglomerate of companies, including Cambridge Analytica — interviewed company founder Nigel Oakes when she was doing research for a book. Oakes compared Trump's tactics to those of Nazi leader Adolf Hitler in singling out Jews for reprisals.

"Hitler attacked the Jews, because ... the people didn't like the Jews," he said on tapes of the interview conducted with Briant. "He could just use them to leverage an artificial enemy. Well that's exactly what Trump did. He leveraged a Muslim."

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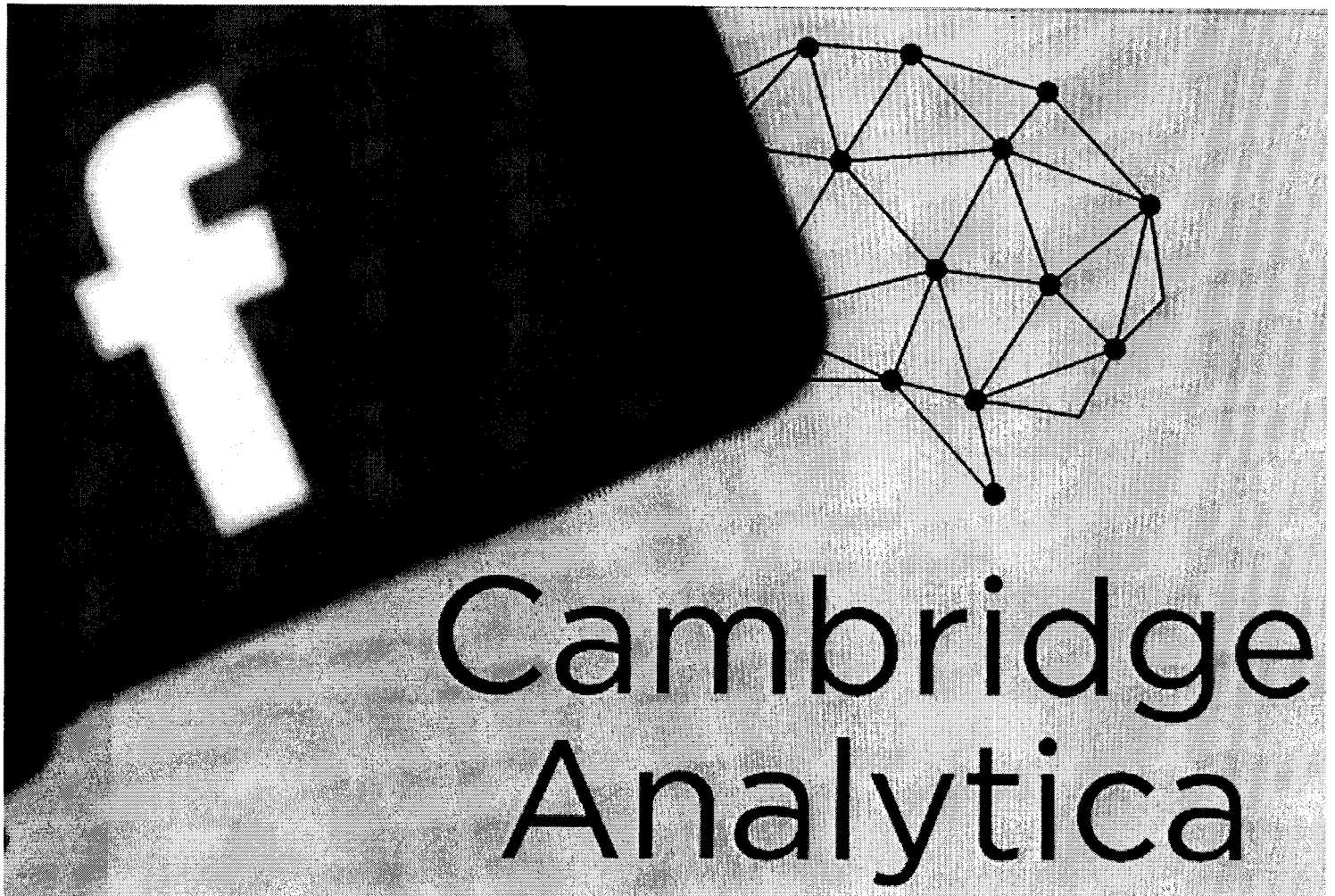
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TIME

Ex-CEO of Cambridge Analytica Refuses to Testify in U.K.



The Facebook logo is seen on the screen of an iPhone in front of a computer screen showing a Cambridge Analytica logo Chesnot—Getty Images

By ASSOCIATED PRESS April 17, 2018

(LONDON) — The chair of the British Parliament's media committee says that Cambridge Analytica's former CEO, Alexander Nix, says he will no longer testify at an upcoming session on fake news, citing an ongoing investigation by the information commissioner's office.

Nix had been recalled by the committee to testify Wednesday following testimony by whistleblower Christopher Wylie on the use of data by some 87 million Facebook users in the campaign for Donald Trump's presidential election.

Committee chair Damian Collins rejected Nix's reason for not appearing, as he has not "not been charged with any criminal offence and there is no active legal proceedings."

Collins says Tuesday that the committee "is minded to issue a formal summons for him to appear on a named day in the very near future."



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