

STATEMENT OF WITNESS

(Criminal Justice Act 1967, ss 2,9/M.C. Rules, 1968, r.58)

Statement of: Gareth Peirce

Age of witness
(if over 18 enter 'over 18') : Over 18

Occupation of witness: Solicitor

Address: Birnberg Peirce Solicitors
14 Inverness Street
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This statement, consisting of 3 pages signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Dated the December 6th 2020

Signed Gareth Peirce

Signature witnessed by Mellan P. Peirce

Re: Prosecution Closing Submission

1. This statement is made in response to the assertion that Professor Kopelman agreed with the defence lawyers to conceal relevant information from the Court. This assertion is not correct.
2. Professor Kopelman was instructed by Birnberg Peirce in May 2019 to provide a psychiatric opinion in this case; his report was due to be filed with the Court by December 18th 2019. Before its receipt Professor Kopelman raised two issues separately, the first that further medical/psychiatric investigations would need to be carried out before he could finalise his opinion

Signed Gareth Peirce Signature witnessed by MC Peirce

and the second (shortly before the receipt of his report and its service on December 18th 2019) a concern at the possible implications of identifying Stella Moris by name as Mr Assange's partner and the mother of two of his children, when she had told Professor Kopelman of the close confidentiality that had been maintained of that information. (Members of this firm had not been party to the detail, content or progression of Professor Kopelman's contact with any interviewee, including with Mr Assange).

3. In light of Professor Kopelman's express concern touching upon the potential of risk to Ms Moris and in particular the two children, it was clear that full information had to be obtained, not then possessed by our firm and that careful advice was required as to appropriate further steps, if any that could or should be taken. Professor Kopelman was himself to be out of the country for one month; full conferences with counsel on all evidence filed on December 18th 2019 were planned for January (in the case of Professor Kopelman on his return by the end of the month).
4. In parallel, documents emanating from evidence within the Spanish court proceedings were being translated providing further evidence on a range of issues; these too were completed by December 18th 2019 for service on that date. (I exhibit extracts at GP1). This incoming material raised concerns relevant to those being raised by Professor Kopelman.
5. In consequence at a time when it had been directed, (and was desirable) that available evidence, including psychiatric reports, should be disclosed, unexpected issues triggering serious concern and professional responsibilities were being raised and had to be dealt with. The specific question canvassed with Professor Kopelman was whether the identification of Ms Moris as Mr Assange's partner could be deferred but the report nevertheless served, without detriment to or qualifications of its conclusions or their basis. If, as it was understood, this could be achieved temporarily, whilst full advice was awaited as to appropriate further steps, I indicated to Professor Kopelman that in the circumstances, I believed that would be appropriate. Professor Kopelman's report was received on December 17th 2019 for service on December 18th at the same time as a considerable body of separate evidence from other witnesses.
6. As is known thereafter dates for the evidential hearing and deadlines for the submission of final medical evidence came to be constantly reviewed and altered.

Signed Garrett Lewis

Signature witnessed by MC Preece

7. Further details were obtained from Ms Moris about her position including that after being informed of interest in the DNA of the older child in 2018, she had not continued to take him to the Embassy; that she did not herself visit the Embassy from November 2018 until Mr Assange's arrest; that Ms Moris had formally changed her name and most recently, had changed her address to one that was more protected.

8. However before further steps were progressed and advised upon by counsel, an application was made for bail for Mr Assange in response to the Covid outbreak. Ms Moris elected to make a statement in support of the application in which details for which confidentiality had hitherto been maintained were set out and served upon the Court and the CPS. These details, following the refusal of a request that anonymity be granted, became a matter of public record. Professor Kopelman was notified of the altered circumstances.

9. Following successive postponements of the case Professor Kopelman served his final report, dated 13th August 2020, as directed. The majority of the inquiries requested by him had by then been completed; the question of anonymity for Ms Moris was no longer an issue. Professor Kopelman's final report consequently referred to her as Mr Assange's partner. He reviewed Dr Blackwood's report, who had interviewed Mr Assange in mid March and had summarised the background history given by Mr Assange as including the relationship established when in the Ecuadorian embassy with his current partner with whom he had two children and by whom he was visited in prison.

10. I confirm there was at no stage any intention to conceal information and regret that the temporary measure suggested in late December 2019 could have given any reason to suggest otherwise than the intention itself, namely to achieve a way in which unrestricted information could be accessed by the Court in the proceedings without concern.

Signed Gareth Peirce

Signature witnessed by MC Peirce