

Deponent: Jason McCue

Sworn: 7 April 2011

Exhibits: JDM 1 to JDM 3

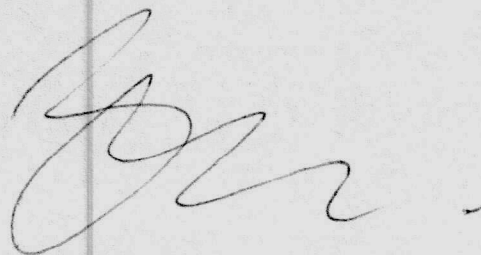
I, JASON MCCUE, Solicitor, of H2O Law LLP, 20-21 Took's Court, London EC4A 1LB make an oath and say as follows:-

- (1) I am the solicitor on record for the victims of Libya sponsored Provisional Irish Republican Army terrorism. I am also Head of the Libya Victims Initiative.
- (2) In March 2011 I was invited by the Libyan Transitional National Council (TNC) to travel to Benghazi to meet with it to discuss issues affecting relations between the UK and the Libyan people that stem from acts of terrorism and support of terrorism carried out by the Regime of Muammar al-Gaddafi.
- (3) On 1 April 2011 I travelled to Benghazi to meet with the TNC.
- (4) Following discussions between me and the TNC, on 5 April Mustafa Mohammed Abdul Jalil, Chairman of the TNC, agreed and signed on behalf of the TNC before me three agreements which I verify and identify as the following exhibited documents marked "JDM 1", "JDM 2" and "JDM 3".

Save as hereinbefore stated I depose to the foregoing from facts within my own knowledge.

SWORN BY JASON DANIEL MCCUE


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SWORN AT SHEARMAN BOWEN & CO

ON THIS 7th DAY OF APRIL 2011

Shearman Bowen & Co Solicitors
DX218
LONDON/CHANCERY LN


B. TICEHURST

Before me a Solicitor of the Supreme Court of England and Wales

This Affidavit is filed by H2O Law LLP, 20-21 Took's Court, London EC4A 1LB

AFFIDAVIT OF JASON DANIEL MCCUE

H2O Law LLP
20-21 Took's Court
London
EC4A 1LB

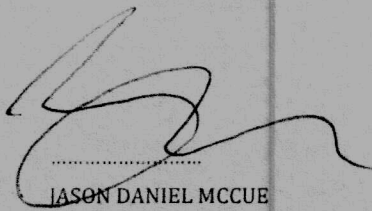
EXHIBITED DOCUMENTS - "JDM 1"

H2O Law LLP

20-21 Took's Court

London

EC4A 1LB



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JASON DANIEL MCCUE

Dated 7 April 2011

STATEMENT OF RECONCILIATION TO THE VICTIMS OF GADDAFI SPONSORED IRA TERRORISM

The NTC hereby reaffirms its historical affinity and friendship with Great Britain and declares its desire to build a new and mutually beneficial relationship with the British people based upon a mutual respect of social justice, democratic principles and the rule of law;

The NTC reiterates its gratitude to the UK Government for its assistance in securing U.N. Resolution 1973 and for the public statements of support made by the Prime Minister, David Cameron to help the people of Libya rebuild its shattered society upon democratic principles;

The NTC hereby recognises that there exists a public need to deal with and resolve certain historical legacy issues involving the Gaddafi Regime, concerning its support for terrorism and previous acts of violence that has adversely affected past relations between UK and Libya, if the peoples of Britain and Libya are to develop a permanent and mutually beneficial relationship which is based upon respect for each other's culture and the rule of law in the future.

To this end the NTC hereby issues this public declaration that it stands ready to deal with all outstanding legacy issues, including the previous Regime's support for terrorism and commission of human rights atrocities both at home and abroad, and in particular:

- a. As an act of friendship towards the British people, and in recognition of the pain suffered by British victims as a consequence of IRA acts of violence, which were actively supported by the Gaddafi Regime in contravention of international law, the NTC hereby issues a voluntary and sincere apology on behalf of the Free People of Libya for the previous conduct of the Gaddafi Regime in supplying Semtex explosives and other support to the IRA for the purposes of committing such acts of violence.
- b. The NTC further declares that, within a reasonable time frame that acknowledges the difficult situation currently on the ground in Libya, it is our sincere desire to reach a morally just and appropriate settlement of the existing UK claimants in McDonald et al v Gaddafi U.S. Case 1:06-CV-00729-JR legal claim, on a parity and non-discrimination basis, in line with other U.S. victim claimants in the same action who have already received compensation pursuant to the principles of the Libyan Claims Settlement Act in the USA;
- c. In recognition of the wider class of similar UK IRA/Gaddafi victims that are not claimants in the above USA action, our sincere desire to enter discussions to consider an appropriately resourced humanitarian fund to be set up to recognise the pain and suffering of such victims and the wider society in the UK, and in particular Northern Ireland.

The free people of Libya feel great compassion and sorrow towards those victims that have suffered at the hands of the Gaddafi Regime and wish to offer a hand of friendship to ease their pain.

Dated 2011.4.5

Signed by

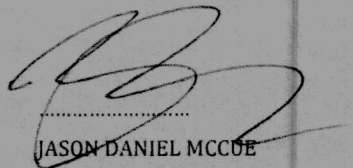


Position: Chairman of the Council.

On behalf of the National Transitional government on behalf of the free Libya people

EXHIBITED DOCUMENTS - "JDM 2"

H2O Law LLP
20-21 Took's Court
London
EC4A 1LB



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JASON DANIEL MCCUE

Dated 7 April 2011

STATEMENT OF MUSTAFA MOHAMMED ABDUL JALIL, CHAIRMAN OF THE NATIONAL TRANSITIONAL COUNCIL

1. I, Mustafa Mohammed Abdul Jalil, Chairman of the National Transitional Council and formerly Minister of Justice during the Gaddafi Regime swear to tell the truth, the whole truth, and nothing but the truth herein.
2. I make this statement on behalf of the families of Pan Am 103/Lockerbie victims regarding the planting of an explosive device upon a U.S. flagged aircraft that resulted in the explosion and crash of Pan Am 103 on December 21st, 1988 over Lockerbie, Scotland.
3. I am the former Justice Minister that made statements to the media regarding Muammer Gaddafi ("Gaddafi") ordering the bombing of Pan Am 103/Lockerbie. I can confirm that the following article recorded accurately what I said: February 24th, 2011 Mail Online by Gerri Peev, "Gaddafi personally gave the order for Lockerbie bombing and I have proof, claims dictator's former justice minister". I repeat herein that "I have information that is one hundred percent sure, that Gaddafi is behind the tragedy at Lockerbie" as is accurately reported in: Swedish interview dated February 24th, 2011, Minister: Jag såg djävulen i Khadafi, Expressen (Minister: I saw the devil in Gaddafi) by Kassem Hamadé.
4. I have personally seen official documents of the Gaddafi regime that directly implicate Gaddafi in the ordering, sanctioning and implementation of the Lockerbie terrorist incident and its subsequent cover up. In due course, I will provide all such evidence to the proper investigating authorities and representatives charged with carrying out investigations in order that the victim may discover the truth about how Gaddafi directly murdered their loved ones.
5. It was common knowledge within the closed circles of the regime that Gaddafi ordered the act of terrorism that occurred at Lockerbie.
6. I can confirm that through his conduct Gaddafi demonstrated his personal culpability to me.
7. I am aware that on 1/31/2001, Abdelbaset Mohmed Ali al-Megrahi was convicted by the Scottish Court that examined the evidence of 270 counts of murder for the bombing of PanAm 103. I am aware from my former position that Megrahi was involved in this act of terrorism. It was common knowledge within the Gaddafi regime.
8. I am also aware that Gaddafi paid money to Megrahi for carrying out his orders to commit the act of terrorism and to cover up that act. Subsequent to his arrest, and later to his release, Gaddafi provided payments to Megrahi to ensure that he did not publicly implicate Gaddafi personally in the act of terrorism.
9. I provide this short statement as our people are engaged in a battle for survival against the Gaddafi regime. I do so in compassion for the victims suffering and in a desire to demonstrate how the new Libya is different to the old regime and sincerely desires democracy, social justice and wealth share for all our people. To that extent it is the new Libyan National Transitional Government's and my sincere desire to provide a more detailed statement of evidence in due course. The NTC has agreed to further liaise with the victims' representative to facilitate this within a reasonable timeframe that acknowledges the difficult situation currently on the ground in Libya.
10. The free people of Libya feel great compassion and sorrow towards those victims that have suffered at the hands of the Gaddafi Regime and wish to offer a hand of friendship to ease their pain.
11. The contents of this statement are accurate and true to the best of my knowledge and belief.

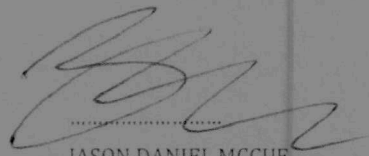
Dated 2011.4.5



Signed By Mustafa Mohammed Abdul Jalil

EXHIBITED DOCUMENTS - "JDM 3"

H2O Law LLP
20-21 Took's Court
London
EC4A 1LB



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JASON DANIEL MCCUE

Dated 7 April 2011

STATEMENT OF RECONCILIATION TO THE LOCKERBIE VICTIMS

As a voluntary act of friendship towards the victims of the Lockerbie tragedy, and in recognition of the pain suffered by the victims as a consequence of the gross act of terrorism committed, organised and directly sanctioned, by the Gaddafi Regime in contravention of morality as well as international law:

- (1) The NTC hereby issues a voluntary and sincere apology on behalf of the Free People of Libya for the previous conduct of the Gaddafi Regime in sanctioning and facilitating such a despicable and direct act of terrorism against the victims of that tragedy.
- (2) The NTC also declares its willingness and desire to facilitate all investigations into the Lockerbie bombing by using its best endeavours to secure all requisite evidence, including the securing of witness statements from those who have relevant knowledge or records, in order to bring closure to remaining historical legacy issues, and unlock a new era of international friendship and co-operation between Libya, Britain, America and the international community.
- (3) The NTC sincerely desires to facilitate enquiries by the Lockerbie victims to discover the truth surrounding the Lockerbie tragedy and in particular the culpability of Gaddafi in sanctioning and conspiring in the act of terrorism against innocent people. The NTC agrees to further liaise with the victims' representative to facilitate this within a reasonable time frame, and invites the victim's representatives back to Libya in six weeks time to further progress matters, subject to the contingencies on the ground in Libya.

The free people of Libya feel great compassion and sorrow towards those victims that have suffered at the hands of the Gaddafi Regime and wish to offer a hand of friendship to ease their pain.

Dated 2011.4.5

Signed by

Position: Chairman of the Council

On behalf of the National Transitional government on behalf of the free Libya people.