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28 April 2010  
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Our ref. DJT/TAB  
Your ref.

**By Email ([info@cj2.nl](mailto:info@cj2.nl)) and Post**

**Strictly Private and Confidential – NOT FOR PUBLICATION**

Dear Sirs

**YouGov plc**

We act for YouGov plc ("YouGov") and its Chief Executive Officer, Mr Stephan Shakespeare.

We write to give you notice of defamatory material published on the website at [www.craigmurray.org.uk](http://www.craigmurray.org.uk) (the "Website"). We understand you are the Internet Service Provider for the Website. The defamatory material is contained in the following postings on the Website:

1. *"How YouGove Fixed Debate Poll"* posted at 18:22 on 24 April 2010;
2. *"April 23, 2010"* posted at 20:51 on 23 April 2010;
3. *"YouGov Push Polling"* posted at 10:24 on 23 April 2010;
4. *"What The Public Really Think"* posted at 8:53 on 23 April 2010;
5. *"The Leaders' Debate"* posted at 21:40 on 22 April 2010; and
6. *"YouGov/Murdoch Distort Poll To Stop Lib Dem Momentum"* posted at 11:02 on 18 April 2010 (together the "Postings").

Copies of the Postings are enclosed.

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The Postings are seriously defamatory of YouGov and Mr Shakespeare. For example, it is alleged that:

1. YouGov, a well known research organisation specialising in public opinion and consumer behaviour, has engaged in "*push polling*" by attempting to influence poll participants to respond negatively regarding Nick Clegg and the Liberal Democrat party;
2. YouGov "*fixed*" the internet poll of voting intentions following the leaders' debate broadcast on 22 April 2010 so that following the "*adjustment*" the Conservative party would win and is therefore a "*disgrace*";
3. YouGov and Mr Shakespeare have falsely claimed that they do not engage in push polling only in "*message testing*" and therefore Mr Shakespeare is a "*liar*" and a "*lying... cunt*". The latter statement regarding Mr Shakespeare appears on the Website if the cursor is held over the photograph of Mr Shakespeare in the third Posting. We enclose a copy of a screen shot of this photograph for your information;
4. YouGov and Mr Shakespeare are biased against the Liberal Democrat party; and
5. YouGov is a "*sleazy Murdoch propaganda vehicle*" because Sky News is YouGov's "*main customer*".

All of these allegations are entirely untrue and seriously defamatory of our clients. The true position is that YouGov is an independent opinion polling organisation. Our clients, in accordance with accepted polling techniques engage in message testing during which both positive and negative messages about organisations are tested on a small number of respondents. In fact, Dr Evan Harris MP, Liberal Democrat Science Spokesman, stated that the questions asked by YouGov regarding the Liberal Democrats were "not part of tracker poll but one researching good attack lines. So OK". This practice is clearly explained in the statement issued by our clients, a copy of which is attached for your further information.

Please note that, as a matter of English law, you are a publisher of this material, and should you fail to take down the Postings in accordance with this request you can be subject to libel proceedings. Under section 1 of the Defamation Act 1996, an internet service provider ceases to be able to rely on the innocent dissemination defence to libel once notice has been given of the defamatory material if the material is not promptly removed.

We have also written on behalf of our clients to Mr Craig Murray, the apparent owner of the Website and the person apparently responsibly for the Postings, asking him immediately to remove the Postings from the Website and to undertake not to repeat these or any similar allegations in future. We enclose a copy of that letter. We hope that he will comply with this request.

However, if he fails to comply with this request within 24 hours, we will write to you again asking you to remove the Postings from the Website or to take down the Website entirely. The purpose of this letter is to put you on notice of this matter and to inform you that we may be required to write to you again in these terms, in respect of which we will require you to take that action expeditiously. Our clients will not take any action against you in respect of your continued publication of the Postings pending that further letter.

We believe that this issue is best addressed in private and confidential correspondence. You will note that this letter is endorsed "*Strictly Private and Confidential – NOT FOR PUBLICATION*" and we would ask that you would honour that confidentiality.

In the meantime, our clients reserve all of their rights.

Yours faithfully

A handwritten signature in black ink that reads "Olswang LLP". The signature is written in a cursive, slightly stylized font.

**OLSWANG LLP**

Encs.

**April 24, 2010**

**How YouGove Fixed Debate Poll**

I have been unmasking the sleazy Murdoch propaganda vehicle that is YouGove, founded by the current Tory candidate for St Albans, and whose Chief Executive Officer is "Sleazy Stephan" Shakespeare, close friend and former PR adviser of Jeffrey Archer, failed Tory parliamentary candidate in Colchester (where he was unexpectedly beaten by the Lib Dem, explaining his huge bitterness towards them), and co-founder of Conservative Home website.

Michael Crick has revealed how YouGove fixed the instant poll after the last leaders' debate. This was an internet poll taken between just 9.27pm and 9.31 pm. Which means that, voting opened immediately after David Cameron finished his closing statement **without waiting for the other candidates' closing statements. Voting closed just after Nick Clegg's closing statement got started.** <http://www.bbc.co.uk/blogs/newsnight/michaelcrick/2010/04/polling.html>

This poll enabled YouGove's main customer Murdoch's Sky News to shrill an instant victory for Cameron, ignoring all the other Clegg victory polls that were taken after he had had a chance to give his closing speech.

YouGove is a disgrace.

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Posted by [craig](#) on [6:22 PM 24/04/10](#) under [The Election](#) | [Comments \(16\)](#)

## April 23, 2010

A tweet from the Sun:

Sun\_Election Tonight's Sun/YouGov poll reveals that Nick Clegg has failed to repeat his poll surge after the second leaders debate...

The anti-Lib Dem campaigning by Murdoch is so blatant it is really not funny. Now when they release the figures for their daily poll, the LibDems are the only party who have increased their vote share on the day before.

Tory 34, LD 29 (up 1), New Labour 29

This was the first opinion poll taken after the hounds of hell of the entire Tory media were released on Nick Clegg yesterday. How Murdoch must be frustrated at the loss of his iron grip on British public opinion. Expect new heights of hysterical Tory attack in the week ahead.

I now have a source within YouGove who tells me that in fact the poll showed the LibDems in the lead and Con on 30, but that was before "adjustment".

YouGove, you have some disgruntled employees. Again if you want to deny this, I will publish your denial. There have been visits to this site from the YouGove server all day.

A roundup of some brilliant dissections of media bias here.

<http://enemiesofreason.co.uk/2010/04/23/friday-links-23410-the-arseoie/#comments>

I didn't realise it was the great Justin who invented #nickleggsfault.

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Posted by **craig** on **8:51 PM 23/04/10** under **Error! Hyperlink reference not valid.** | [Comments \(9\)](#)

## **YouGov Push Polling**

YouGov spluttered and denied push polling in response to my exposure of their push polling.

[http://www.craigmurray.org.uk/archives/2010/04/sky\\_leaders\\_deb.html](http://www.craigmurray.org.uk/archives/2010/04/sky_leaders_deb.html)

Where did they publish their denial? Conservative Home!!!! Entirely appropriate, in fact.

<http://conservativehome.blogspot.com/theorydiary/2010/04/the-shakespeare-report-message-testing-v-push-polling.html>

Here is what Mr Shakespeare, Chief Executive of YouGov, says:

Push-polling is a very different beast. Push-polling is unethical. Push-polling is conducting a poll to influence a respondent for some particular purpose. Mainly it is when people are pretending to conduct a poll, but actually they are contacting hundreds of thousands of people to repeat attack lines – it's campaigning masquerading as polling, and in New Hampshire it's even illegal (and quite right too).

Another variant of push-polling (at least that's how the phrase is often used) is when you ask 'questions' designed to influence the outcome of a poll. For example, if I ask you to choose which you like best from a list of positive attributes about a candidate and then ask you who you would want to vote for.

Message testing is an extremely valuable and reasonable form of research. Push-polling of any kind is plain wrong. YouGov, like all members of the British Polling Council, does lots of message-testing, and zero push-polling.

I hope that's clear.

Have a close look at Stephan Shakespeare



That is the face of a liar. YouGov did ask the question I initially quoted, smearing Nick Clegg over campaign donations from a criminal. Oh, and here is a screenshot of a YouGov online poll:



And which of the following potential outcomes scares you more about a Liberal Democrat victory or a hung parliament?

- It could lead to political haggling, backroom deals and corruption
- It could lead to the integration of Britain into the EU
- A vote for the Liberal Democrats will probably make Gordon Brown Prime Minister again
- It could lead to a weaker pound and higher interest rates that hit every family
- It could paralyse government for months
- It could create economic uncertainty and instability at a time when our economy is already weak
- It could lead to higher taxes
- None of these - nothing scares me about the Liberal Democrats
- All of these - everything about the Liberal Democrats scares me

I have been sent this by someone who assures me it is genuine. I should state that YouGov have refused either to confirm or to deny if it is genuine.

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Posted by craig on [10:24 AM 23/04/10](#) under [The Election](#) | [Comments \(45\)](#)



## What The Public Really Think

Here is a list of some of the search terms which have brought people to this blog via search engines in the last hour:

tory bias in sky debate  
sky biased against clegg  
adam Boulton bias debate  
was adam Boulton biased  
why civil liberties not on debate agenda  
murdoch pushing Tories in debate  
sky bias  
sky news bias debate  
yougov murdoch  
sky news biased moderator  
yougov bias lib dem smear  
questions fixed PM debate  
yougov anti Lib Dem survey

Interesting isn't it? I expect hundreds more in the course of today. There are a substantial number of people out there who have seen through the corporate media and are searching the internet for some truth.

Which is why we have had 68,104 unique visitors so far in April.

I am also on Facebook and I believe you can follow this blog on Twitter, though I confess to not having mastered the best use of Twitter yet. And of course you can purchase my books from the top left hand column.

UPDATE

"Craig Murray" has been displaced for the first time ever as the most used recent search to bring people to this site. The most used search this morning is "Debate sky bias", And that is only those who used that precise search - there are 78 searches relating to Sky or Murdoch bias in the most recent 100 searches that brought people here.

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Posted by [craig](#) on [8:53 AM 23/04/10](#) under [The Election](#) | [Comments \(6\)](#)

**April 22, 2010**

**The Leaders' Debate**

The Murdoch Sun/YouGov einstant poll says that Cameron won. With that much directorial manipulation I am hardly shocked. YouGove probably manipulated the poll too.

The fact that Palestine did not even get a mention in a foreign affairs debate is truly shocking.

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Posted by [craig](#) on [9:40 PM 22/04/10](#) under [The Election](#) | [Comments \(26\)](#)

## **YouGov/Murdoch Distort Poll To Stop Lib Dem Momentum**

YouGov produce a daily poll for the Sun and Sunday Times. Today's YouGov was the only post-debate poll to show the LibDems in third place.

At comment 268 on the thread linked below, we hear about their next poll:

268.

Just done a YouGov, Mostly about Clegg & LD

Here was one of the question

"Nick Cleggs says the other parties are to blame for the MP scandals, he has taken money from a criminal on the run, many of his MPs have been found guilty of breaking the rules and his own party issued guidance on how to fiddle the expenses system?"

I'd say that was fairly direct!

There were some 17 other questions re the LD

by sealoo April 18th, 2010 at 10:33 am

<http://www2.politicalbetting.com/index.php/archives/2010/04/18/how-do-the-blues-and-reds-deal-cleggmania/comment-page-4/>

I asked on the thread whether YouGov asked that before asking about voting intention. Sealoo replied that indeed this was the first question, and others attacking the Lib Dems in the same vein followed. Only then did they ask about voting intention.

The proposition above is, obviously to anyone, not really a question but a set of dubious propaganda statements designed to influence the interviewee.

Plainly this is a deliberate attempt to produce a poll which shows the Lib Dem surge as a blip, and thus discourages potential Lib Dems voters. That the Murdoch press pull such a stunt should surprise nobody. But even though they are getting huge money from Murdoch for these daily polls, YouGov must realise that this abrogates all professional methodology and breaches the ethics of the polling industry. The senior management of YouGov must resign.

STOP PRESS

Anthony Wells of YouGov (**known henceforth as YouGove**) admits YouGov asking these "questions, but claims the voting intention question ought to have been asked first. He also points out that the antiLib Dem questions were "Not for publication".

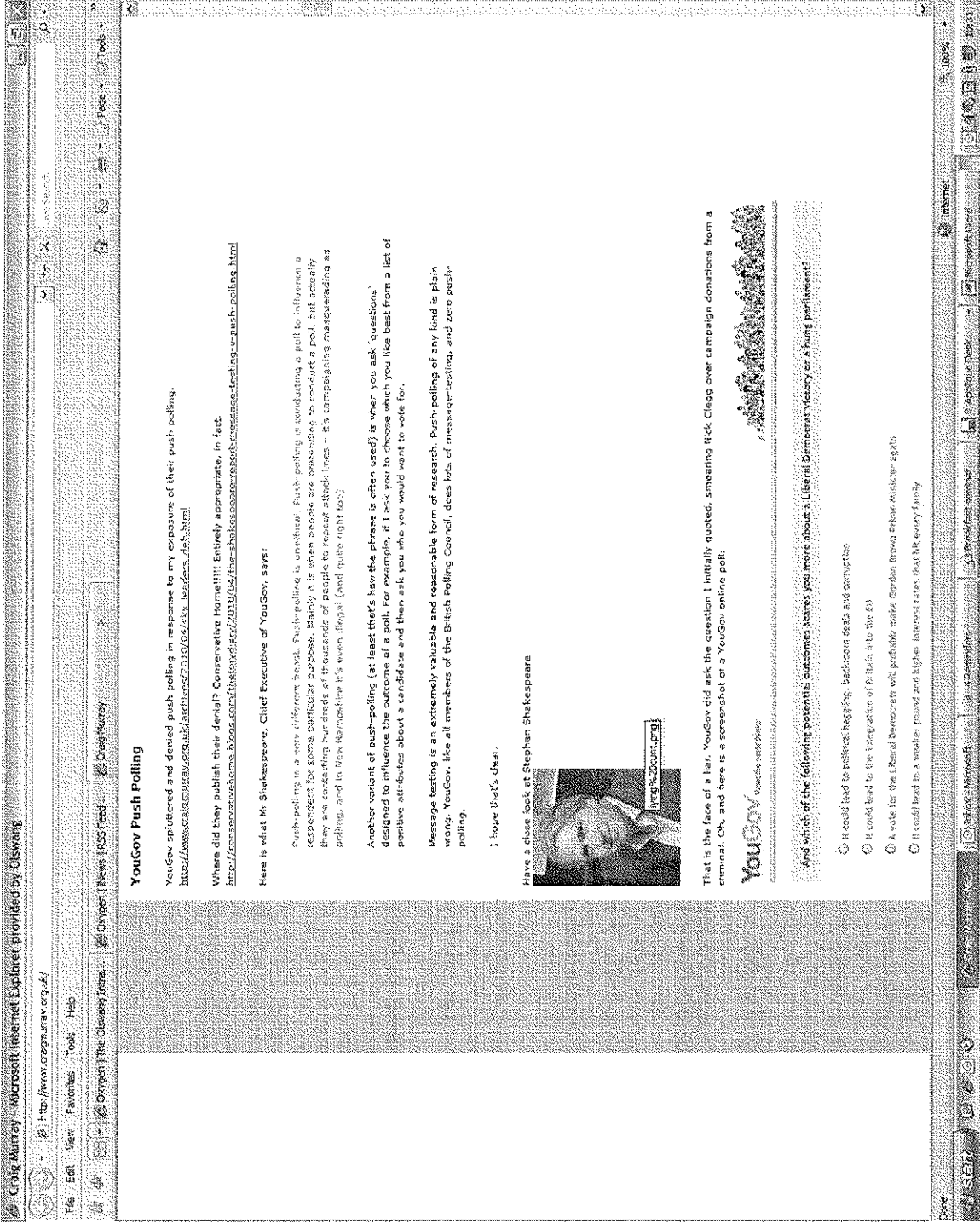
I bet they bloody weren't.

See 14.15 on this thread. Hat tip Roger Mexico.  
<http://www.ukpollingreport.co.uk/blog/archives/2611>

**YouGove - Rupert Murdoch's Pollster of Choice**

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Posted by [craig](#) on [11:02 AM 18/04/10](#) under [The Election](#) | [Comments \(57\)](#)



### YouGov Push Polling

YouGov splintered and denied push polling in response to my exposure of their push polling. <http://www.ozgov.gov.uk/articles/2010/04/20/100420shakespearepushpolling.html>

Where did they publish their denial? Conservative Home!!!! Entirely appropriate, in fact. <http://conservativehome.blogs.com/theblog/2010/04/10/100410shakespearepushpolling-testing-v-push-polling.html>

Here is what Mr Shakespeare, Chief Executive of YouGov, says:

Push polling is a very different beast. Push-polling is unethical. Push-polling is conducting a poll to influence a respondent for some particular purpose. Mainly it is when people are persuaded to conduct a poll, but actually they are contacting hundreds of thousands of people to appear attack lines - it's campaigning masquerading as polling, and in New York time it's even illegal (and quite right too).

Another variant of push-polling (at least that's how the phrase is often used) is when you ask 'questions' designed to influence the outcome of a poll. For example, if I ask you to choose which you like best from a list of positive attributes about a candidate and then ask you who you would want to vote for.

Message testing is an extremely valuable and reasonable form of research. Push-polling of any kind is plain wrong. YouGov, like all members of the British Polling Council, does lots of message-testing, and zero push-polling.

I hope that's clear.

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Stephan Shakespeare

That is the face of a liar. YouGov did ask the question I initially quoted, smearing Nick Clegg over campaign donations from a criminal. Oh, and here is a screenshot of a YouGov online poll:



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## thetorydiary

- HOME
- TORY DIARY
- PLATFORM
- SEATS
- LOCAL GOVT
- PARLIAMENT
- THINKTANKS
- INTERNATIONAL
- CENTRE RIGHT
- VIDEO

Monday, April 19, 2010

### The Shakespeare Report: Message Testing v Push Polling

*Stephan Shakespeare, CEO of YouGov, on opinion polling.*

In swift succession, YouGov has been accused of being anti-Labour, anti-Conservative, and (today), anti-LibDem. Apparently, at various stages, we have had Labour / Conservatives / LibDems too low, and this is because we're unrepresentative / skewing the weights / push-polling. I think we've dealt with the first two, but now we have to deal with the third – which is easy to do, since it just requires a simple explanation of the difference between push polling and message testing.

Most professionally-run campaigns will at some time want to test public reaction to a variety of messages, to see if its communication strategy is likely to work. This applies to companies and brands, and of course political parties. Typically, they will want to test both positive and negative messages, either to promote those messages or find out which they most need to defend themselves against. Market researchers will run those tests to specifically or randomly selected respondents. Typically some respondents will see one set of questions, others will see another set. When you see these questions, you can't be sure who the client is, or what the reason for the test is.

Voting intention questions intended for publication must always come at the start of a poll, so that respondents cannot be affected by anything else that might be in the poll. In fact all questions asked in research that is for publication is carefully ordered so as to minimise the effect of any question on the questions that follow.

Push-polling is a very different beast. Push-polling is unethical. Push-polling is conducting a poll to influence a respondent for some particular purpose. Mainly it is when people are pretending to conduct a poll, but actually they are contacting hundreds of thousands of people to repeat attack lines – it's campaigning masquerading as polling, and in New Hampshire it's even illegal (and quite right too).



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Message testing is an extremely valuable and reasonable form of research. Push-polling of any kind is plain wrong. YouGov, like all members of the British Polling Council, does lots of message-testing, and zero push-polling.

I hope that's clear.

I obviously can't tell you about who our clients might be or what they were interested in, but I can categorically state that all our published voting intention questions come at the start of our polls, as is standard practice. I also remind you that you can never tell as a respondent to a survey whether the questions you are seeing are the same as the questions a different respondent is seeing, nor whether the purpose is attack or defence or something quite different. YouGov conducts polls for at least three different political parties in this election, as well as for third parties that are interested in these things, such as academics. I hope that clears things up.

Some people are getting worked up just by the idea of negative messages. As far as I can see, every political campaign out there at the moment -- every single one of them -- is full of negative as well as positive messages. And most of them will have been tested, in one way or another.

*Stephan Shakespeare*

Posted at 20:15 in [The Shakespeare Report](#) | [Permalink](#)



Craig Murray  
www.craigmurray.org.uk

28 April 2010  
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The Postings are seriously defamatory of YouGov and Stephan Shakespeare. For example, it is alleged that:

1. YouGov, a well known research organisation specialising in public opinion and consumer behaviour, has engaged in "*push polling*" by attempting to influence poll participants to respond negatively regarding Nick Clegg and the Liberal Democrat party;
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All of these allegations are entirely untrue and seriously defamatory of our clients. The true position is that YouGov is an independent opinion polling organisation. Our clients, in accordance with accepted polling techniques engage in message testing during which both positive and negative messages about organisations are tested on a small number of respondents. In fact, Dr Evan Harris MP, Liberal Democrat Science Spokesman, stated that the questions asked by YouGov regarding the Liberal Democrats were "not part of tracker poll but one researching good attack lines. So OK". This practice is clearly explained in the statement issued by our clients, of which you were well aware and indeed quoted from in the third Posting.

Our clients understand that their services are always likely to be subject to a degree of public scrutiny and criticism. However, they cannot accept that they be subject to wholly false and abusive allegations which are potentially very damaging to them. It is for that reason that they have instructed us to write to you in these terms.

We have advised our clients that if they were to issue proceedings in libel in relation to the allegations contained in the Postings, they would be likely to recover substantial damages. Any action brought by our clients may include a claim in special damages to recover actual financial loss occasioned to it.

However, our clients' principal concern is to protect their reputation by taking all necessary steps to prevent the false and defamatory allegations contained in the Postings from being published further. We therefore require that you take the following steps:

1. immediately remove from your Website all trace of the Postings so that they are no longer accessible;
2. provide your written undertaking not to repeat the allegations contained in the Postings or any similar allegations regarding YouGov and/or Mr Shakespeare;
3. notify anyone to whom your content is licensed, including third party databases, that the Postings should be removed from their databases with immediate effect;
4. undertake to publish an apology and retraction to our clients in terms to be agreed; and
5. undertake to reimburse our clients in respect of the reasonable legal costs incurred in this matter.

In view of the urgency of this matter, we look forward to hearing from you by return and in any event by no later than 24 hours after the date and time of this letter. In the event that you remove the Postings from your website immediately and respond promptly to this letter agreeing to our requests, then our clients may be prepared to forgo payment by you of damages.

Please note that we have also written to the host ("the Host") of your website, CJ2 Hosting & Development, notifying them of the nature of the Postings. We enclose a copy of that letter. Our clients do not wish that the Website in its entirety be taken down if this can be avoided. For that, in the letter to the Host, we have stated that our clients require that it take no action pending a further letter from us. That is to afford you an opportunity to remove the Postings and provide the undertakings referred to above. However, if we do not hear from you within 24 hours of the date and time of this letter, we will write to the Host again asking that the Postings be removed or the Website be taken down. You will understand that in this eventuality the likelihood is that the entire Website will be taken down.

We believe that this dispute is best addressed in private and confidential correspondence. You will note that this letter is endorsed "*Strictly Private and Confidential – NOT FOR PUBLICATION*" and we would ask that you would honour that confidentiality.

Please note that pending your response, all of our clients' rights are expressly reserved.

Yours faithfully



**OLSWANG LLP**

Encs