

<p>1 Wednesday, 29 February 2012                  2 (10.00 am)                  3 (Proceedings delayed)                  4 (10.06 am)                  5 LORD JUSTICE LEVESON: Yes, Mr Jay?                  6 MR JAY: We're moving on to police evidence today relating                  7 to the investigation in 2006, and then what happened in                  8 2009. There are three witnesses. The first is going to                  9 be Mr Williams. We're going to use as our guide, but                  10 I'll put it in those terms, the witness statements which                  11 were prepared in a different context, namely for the                  12 purposes of the judicial review proceedings, where the                  13 issue was not identical with the issue or issues which                  14 concern this Inquiry.                  15 LORD JUSTICE LEVESON: But the way in which the police                  16 undertook that operation, which is the subject of                  17 criticism in this Inquiry, was broadly an overlapping                  18 issue in the judicial review proceedings.                  19 MR JAY: It certainly was although much of the statements                  20 are concerned with issues of notification of victims,                  21 which is also relevant to this Inquiry, but perhaps not                  22 with identical emphasis.                  23 I've been told by those representing the officers                  24 that there may well need to be redactions made to the                  25 statements before they enter the public domain. This                  Page 1</p>	<p>1 address?                  2 MR GARNHAM: Sir, there's been no section 21 notice in                  3 respect of any of these witnesses.                  4 LORD JUSTICE LEVESON: No, but had we not had the                  5 statements, Mr Garnham, there would have been.                  6 MR GARNHAM: Absolutely. We volunteered these statements                  7 because of the time at which we were being asked -- when                  8 it was being indicated to us their evidence was                  9 required. They were, as Mr Jay rightly says, prepared                  10 for a different purpose. They substantially cover the                  11 territory, but I'm entirely content that Mr Jay proceeds                  12 in the way he does.                  13 LORD JUSTICE LEVESON: Right. There it is. I'm sure that                  14 we'll illuminate the most important features of their                  15 evidence in any event. They'll be published as soon as                  16 possible.                  17 Yes?                  18 MR JAY: The first witness, then, is Mr Williams, please.                  19 DS PHILIP NEIL WILLIAMS (sworn)                  20 Questions by MR JAY                  21 MR JAY: Make yourself comfortable, please, Mr Williams.                  22 Your full name for the Inquiry.                  23 <b>A. Philip Neil Williams.</b>                  24 Q. I'm going to ask you to turn to your right and find the                  25 bundle which I hope is there, which is entitled "Witness                  Page 3</p>
<p>1 only emerged in the course of the last 45 minutes or so,                  2 so the statements are not going to be published                  3 immediately on the website, but they will be as soon as                  4 possible, and hopefully by the end of today.                  5 Given the nature of the redactions, there's no                  6 reason why the statements can't be put on the screen,                  7 but I will not be asking questions which relate to the                  8 matters which might be redacted. They are general                  9 operational matters, which are of little or no interest                  10 to this Inquiry.                  11 LORD JUSTICE LEVESON: Right. Mr Garnham, is that right?                  12 MR GARNHAM: Sir, yes.                  13 LORD JUSTICE LEVESON: Let me make it clear, I'm sorry this                  14 hasn't happened to date, because the speed with which it                  15 is necessary for this Inquiry to proceed has inevitably                  16 meant that statements are taken as read, and those who                  17 haven't had the advantage of being able to read the                  18 statements in advance, therefore, but who are following                  19 the Inquiry, don't get the same advantage of the                  20 contemporaneous understanding of what's going on.                  21 But there are two things that follow. First of all,                  22 you are content that the statements which were prepared                  23 for the judicial review proceedings are sufficient for                  24 your purposes to represent the responses by these                  25 witnesses to the issues which I've asked them to                  Page 2</p>	<p>1 statements of Metropolitan Police officers".                  2 <b>A. Is that file 1?</b>                  3 Q. No. It's probably going to be -- ah, here it is.                  4 (Handed).                  5 Under tab 2 you'll find a witness statement which                  6 you gave in the judicial review proceedings and which                  7 has our number ending 04116. You signed this statement                  8 on 29 September 2011, is that right, Mr Williams?                  9 <b>A. Yes, I did.</b>                  10 Q. Can I deal with some introductory matters very briefly                  11 indeed?                  12 LORD JUSTICE LEVESON: Could you first of all tell me your                  13 current rank?                  14 <b>A. Sir, I'm a Detective Chief Superintendent.</b>                  15 LORD JUSTICE LEVESON: Thank you very much indeed.                  16 MR JAY: You joined the Metropolitan Police in 1983. At the                  17 time which concerns us, you were a Detective                  18 Superintendent. In 2004, you transferred to Specialist                  19 Operations, which was then called SO13, but which later                  20 became SO15; is that right?                  21 <b>A. That's correct, sir.</b>                  22 Q. And you were promoted to Detective Chief Superintendent                  23 in 2009. Could I ask you, please, very briefly about                  24 SO13, which is the anti-terrorist branch. You cover                  25 this in paragraph 6 of your statement, but what did it                  Page 4</p>

<p>1 do in 2006?</p> <p>2 <b>A. The anti-terrorist branch at that time is part of the</b></p> <p>3 <b>Metropolitan Police station -- sorry, Police Service.</b></p> <p>4 <b>Primarily the role is to protect London from terrorism,</b></p> <p>5 <b>but at that time we were the only counter terrorism unit</b></p> <p>6 <b>of its size and capability within the UK, and therefore</b></p> <p>7 <b>we would provide investigative resources throughout the</b></p> <p>8 <b>country and indeed overseas to any terrorist incident.</b></p> <p>9 Q. Thank you. You say in paragraph 7 that kindred or</p> <p>10 terrorism allied matters weren't mainstream terrorist</p> <p>11 investigations but nonetheless could fall by implication</p> <p>12 within the ambit of SO13. In Operation Caryatid, as it</p> <p>13 started in December 2005, was such a kindred and allied</p> <p>14 matter. Have I correctly understood the position?</p> <p>15 <b>A. Yes, that's correct, sir.</b></p> <p>16 Q. In 2005, SO13 was headed by Deputy Assistant</p> <p>17 Commissioner Peter Clarke; is that correct?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. In relation to as it were the operational tree going</p> <p>20 upward, very succinctly, where did Mr Yates and</p> <p>21 Mr Hayman fit?</p> <p>22 <b>A. Mr Hayman was the Assistant Commissioner of specialist</b></p> <p>23 <b>operations, so Mr Clarke would report to him, and</b></p> <p>24 <b>Mr Yates was not at all part of specialist operations.</b></p> <p>25 <b>I believe he was a Deputy Assistant Commissioner within</b></p> <p style="text-align: center;">Page 5</p>	<p>1 <b>recovering and our photographic intelligence unit.</b></p> <p>2 <b>But the other -- if you like, the other three</b></p> <p>3 <b>superintendents in terms of intelligence, and forensic,</b></p> <p>4 <b>we also provided an occasional SIO role, particularly</b></p> <p>5 <b>for some of those kindred offences that we mentioned.</b></p> <p>6 Q. Yes. The final point in terms of background context,</p> <p>7 and we're going to see this borne out by contemporaneous</p> <p>8 documents, that certainly after 2001, and in</p> <p>9 a heightened way after July 2005, it would not be an</p> <p>10 understatement to say that SO13 was under considerable</p> <p>11 pressure in relation to its core business; is that</p> <p>12 correct?</p> <p>13 <b>A. Absolutely huge pressure.</b></p> <p>14 Q. Yes. We will see that demonstrated by the</p> <p>15 contemporaneous documents. But can I come forward then</p> <p>16 to paragraph 12 of your statement. You were told in</p> <p>17 December 2005 that concerns had been raised by members</p> <p>18 of the royal household that voicemail messages were</p> <p>19 being intercepted. Those concerns, if I can paraphrase</p> <p>20 the documents, were based on the fact that information</p> <p>21 was appearing in the press which the relevant members of</p> <p>22 the royal household felt could only have come from</p> <p>23 interception of voicemails; is that right?</p> <p>24 <b>A. That's correct.</b></p> <p>25 LORD JUSTICE LEVESON: I'm sorry, could I just interrupt</p> <p style="text-align: center;">Page 7</p>
<p>1 <b>something called the specialist crime directorate. So</b></p> <p>2 <b>Mr Yates had no role in specialist operations counter</b></p> <p>3 <b>terrorism.</b></p> <p>4 Q. Thank you. He comes into the picture in 2009, but</p> <p>5 wasn't in the picture in 2006. Have I correctly</p> <p>6 understood --</p> <p>7 <b>A. That's correct, sir.</b></p> <p>8 Q. Paragraph 9, you give us some idea of the resources</p> <p>9 available to SO13. There were four investigation teams,</p> <p>10 each one was led by a detective superintendent, but in</p> <p>11 all there were about 50 officers?</p> <p>12 <b>A. That's correct, sir.</b></p> <p>13 Q. And you as a detective superintendent were head of one</p> <p>14 of the teams and also head of operational support?</p> <p>15 <b>A. No, I wasn't head of one of those investigative teams.</b></p> <p>16 <b>There were -- each of those teams was led by a detective</b></p> <p>17 <b>superintendent. There were then three other</b></p> <p>18 <b>superintendents that headed up. One was forensics, one</b></p> <p>19 <b>was intelligence and one was operations, and I headed up</b></p> <p>20 <b>operational support. The role of that was to provide</b></p> <p>21 <b>all the resourcing in terms of staff, equipment, to the</b></p> <p>22 <b>whole of SO13, and I also had responsibility in other</b></p> <p>23 <b>areas in terms of something called the reserve, our 24-7</b></p> <p>24 <b>contact point, in particular for the anti-terrorist</b></p> <p>25 <b>hotline, the bomb disposal team, our dedicated CCTV</b></p> <p style="text-align: center;">Page 6</p>	<p>1 a moment and find out this fact: you've identified the</p> <p>2 role of the Assistant Commissioner and the Deputy</p> <p>3 Assistant Commissioner, and the Deputy Assistant</p> <p>4 Commissioner had a deputy who was a commander. And then</p> <p>5 within SO13 there was a detective chief superintendent.</p> <p>6 <b>A. That's correct, sir. In terms of my line management,</b></p> <p>7 <b>above me was a detective chief superintendent. He had</b></p> <p>8 <b>responsibility for all of the superintendents and, if</b></p> <p>9 <b>you like, the operational delivery of the work of the</b></p> <p>10 <b>anti-terrorism branch. Above him was a commander, and</b></p> <p>11 <b>he was the deputy national coordinator for terrorist</b></p> <p>12 <b>investigations, and so this was this UK and</b></p> <p>13 <b>international co-ordinating responsibility, and he</b></p> <p>14 <b>worked for Peter Clarke, who for the United Kingdom was</b></p> <p>15 <b>the national coordinator for terrorism investigations.</b></p> <p>16 LORD JUSTICE LEVESON: The reason I ask the question is not</p> <p>17 merely to identify all the people, but to have some</p> <p>18 understanding about who was going to make the</p> <p>19 operational decisions about any of the work that you</p> <p>20 were doing, and in particular as we go through this</p> <p>21 operation, and this is why I interrupt now, I'd be keen</p> <p>22 to understand who knew what and who was responsible for</p> <p>23 which decisions and how far did they have to percolate</p> <p>24 up or was it appropriate to leave them -- I don't say</p> <p>25 leave them at a reduced rank of detective chief</p> <p style="text-align: center;">Page 8</p>

<p>1 superintendent, I don't mean that at all, but you 2 understand the point that I'm making? 3 <b>A. Yes.</b> 4 LORD JUSTICE LEVESON: Right. So with that introduction ... 5 MR JAY: Paragraph 12 you say: 6 "Due to the obvious security implications and 7 sensitivities surrounding members of the royal 8 household, it was decided by Mr Clarke that SO13 would 9 carry out the enquiry." 10 Who was it who decided who would be leading the 11 enquiry? In other words, who picked you? 12 <b>A. Mr Clarke did.</b> 13 Q. Was there any discussion with you about that? Do you 14 know on what basis you were picked? Was it because 15 everybody else was working 100 per cent and you 16 109 per cent? How did it work? 17 <b>A. I believe, because this was one of those initial 18 enquiries that fell into that remit of kindred matters, 19 therefore it was not a core terrorism investigation 20 which would have more automatically gone to one of those 21 investigation pods, therefore this was typical of 22 something that would come to me or one of my other 23 colleagues. I understand ultimately Mr Clarke makes the 24 decision. He would have discussed it with John McDowall 25 and Tim White, because it was actually Tim White that</b> Page 9</p>	<p>1 Lowther-Pinkerton, then private secretary to the royal 2 princes, and HA is Helen Asprey, who was, at the time -- 3 <b>A. If I may help, she's also one of the private secretaries 4 to the two princes.</b> 5 Q. Yes, but junior, I think, to JLP? 6 <b>A. I don't know the differences.</b> 7 Q. And the reason you say in the decision log: 8 "... to establish whether or not the telephone 9 companies can provide the relevant data to demonstrate 10 the potential source of the request to listen to the 11 voicemail. This will ultimately be required. The best 12 evidence of a criminal offence is identified but in 13 terms of our initial priorities it should help to 14 identify whether or not another phone or person accessed 15 the voicemails without their permission." 16 So this was the starting point for the 17 investigation; is that right? 18 <b>A. That's correct, sir.</b> 19 Q. I move forward to tab 10. We're now, I think, at the 20 end of January of 2006: 21 "Further liaison between DI Southwark and Vodafone 22 experts has now revealed that there are a number of 23 outside numbers ringing in to JLP's voicemail ..." 24 Pausing there, later enquiries revealed that there 25 were about nine rogue phone numbers calling in to either Page 11</p>
<p>1 <b>briefed me in more detail, but that's how the 2 decision-making was made.</b> 3 Q. Thank you. Mr Clarke's instructions or the parameters 4 set by him you say were clear: to investigate the 5 unauthorised interception of voicemails in the royal 6 household, prosecute those responsible if possible, and 7 to take "all necessary steps to prevent this type of 8 abuse of the telephone system in the future". 9 Particularly that last point, did those remain the 10 instructions throughout? 11 <b>A. They remained consistent throughout. The only thing 12 I think is important at this stage, the only caveat 13 would be that at stage we were completely open minded as 14 to how this information was actually -- if it was coming 15 out, how it was coming out. We didn't know definitively 16 about the interception of voicemail. So the first stage 17 was: what is actually happening here?</b> 18 Q. Yes. That's made clear, Mr Williams, from tab 3 of file 19 1. We're looking here at decision number two within 20 a decision log, which is a contemporaneous running log 21 of key decisions made during the course of this 22 investigation. In order to investigate whether or not 23 voicemails were being hacked into, you instructed 24 Detective Inspector Southwark to obtain incoming data 25 for the two relevant mobile phones. JLP is Mr Jamie Page 10</p>	<p>1 JLP's voicemail or AJ's voicemail. It's not in this 2 document, but this is established by later evidence, 3 isn't it? 4 <b>A. Okay.</b> 5 Q. "... in particular one number which comes back to the 6 home address of the royal editor of the News of the 7 World, the columnist for the Blackadder column, namely 8 Clive Goodman. It is in these columns that the 9 potentially privileged information, possibly sourced 10 from JLP's voicemail, has appeared. CG's home phone is 11 shown as calling JLP's voicemail direct on relevant 12 dates to JLP's suspicions being raised and certainly 13 within the right timeframe." 14 So you were beginning to gather circumstantial 15 evidence, which was the evidential basis for the 16 building case; is that right? 17 <b>A. That's correct, sir.</b> 18 Q. "The implications are potentially quite far reaching 19 because Vodafone have apparently not appreciated that 20 this was even possible, ie someone obtaining the 21 separate unique voicemail number of Vodafone service 22 users and literally phoning in to listen to voicemails 23 belonging to other people without their knowledge or 24 permission." 25 Pausing there, evidence this Inquiry has received Page 12</p>

<p>1 would suggest that that's a bit of a startling 2 proposition, that Vodafone didn't know about it, but 3 that's what you were told by whoever you spoke to at 4 Vodafone, is that so?</p> <p>5 <b>A. At the time, that was exactly the position with 6 Vodafone. Sorry, with the DI who was working for me, it 7 was Kevin Southworth. It's probably my writing, 8 I apologise. His initial enquiries with Vodafone was: 9 it's not possible. And it was only because we 10 persisted, and in particular him, with a particular 11 member of their technical staff that we discovered or 12 they discovered, so they were telling us, that this was 13 even possible.</b></p> <p>14 <b>Equally, that was consistent with a message from the 15 other phone companies at that time.</b></p> <p>16 Q. Right. Then you continue: 17 "If it is possible, then CG may have done this on 18 more than the occasions we have touched on with other 19 people. If this is possible, it's likely to be far more 20 widespread than CG, hence serious implications for 21 security confidence in Vodafone voicemail, and perhaps 22 the same is true for other service providers." 23 Knowing what we know now, that is a rather prescient 24 observation, if I may say so, but you were looking ahead 25 to what seems obvious to us now, but which was certainly</p> <p style="text-align: center;">Page 13</p>	<p>1 Q. If I can paraphrase the next page of this document on 2 the internal numbering page 16, the prosecutions were 3 going to be dependent, amongst other things, on the 4 willingness of JLP and HA to prosecute, in other words 5 to give evidence, and as we know, they expressed that 6 willingness, didn't they?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Tab 22 next, Mr Williams. Another review of the case, 9 4 April 2006. You had reached the stage where you were 10 seeking guidance from the CPS as to the way forward, 11 because you required legal advice and advice as to the 12 body of evidence you would require to enable 13 a successful prosecution to be brought. Is that the 14 position?</p> <p>15 <b>A. That's correct.</b></p> <p>16 Q. You identify two main offences. We're concerned really 17 only with the first, because the second, under the 18 Computer Misuse Act, although considered, was later to 19 pass out of consideration. 20 Section 1 RIPA interception of a communication 21 system, it's an indictable offence. Then you say: 22 "In terms of points to prove, the key aspect would 23 be that any interception took place prior to the 24 intended recipient receiving the message." 25 Can I be clear about that, Mr Williams? Was that</p> <p style="text-align: center;">Page 15</p>
<p>1 passing through your mind at the time; is that right?</p> <p>2 <b>A. Yes, that's correct.</b></p> <p>3 Q. Thank you. I'm not going to cover every paragraph of 4 your statement, there isn't time. We're going to take 5 intervening paragraphs as read, but I'd like to move 6 forward to tab 16, which is a review carried out on 7 9 March 2006. So we can just see where you were, the 8 second bullet point: 9 "Following a year's worth of telephone data for the 10 home telephone number attributed to Goodman, it's 11 evident that JLP's UVN has been telephoned by Goodman 12 a total of 78 times up from October 2005 through until 13 at least the end of January 2006 [then the pattern of 14 the calls is stated] ... and based on this pattern, five 15 other UVN numbers appear to be being called with a 16 degree of frequency. To date one of those numbers has 17 been identified ..." and then were within the royal 18 household. 19 And so the picture is building up which is linking 20 Mr Goodman, but at this stage Mr Goodman alone, to 21 possible unlawful interference with voicemails, an 22 offence, as you say in the earlier document, under the 23 2000 Act. You hadn't, of course, at this stage brought 24 anybody else into the picture, had you?</p> <p>25 <b>A. That's correct.</b></p> <p style="text-align: center;">Page 14</p>	<p>1 your opinion?</p> <p>2 <b>A. To start with, having read the law myself, that was my 3 opinion, and I went to the CPS to get them to give their 4 view, and consistently throughout this case that was 5 their opinion, and at no time did that change in my 6 mind.</b></p> <p>7 Q. Is this right: you stated your opinion of the law based 8 on your research of the law before you ever spoke to the 9 CPS, and we see it here in this document; is that 10 correct?</p> <p>11 <b>A. I think it may have been earlier, but as in any 12 investigation, I consider what offences may have been 13 disclosed. I actually had -- in the anti-terrorist 14 branch, we worked with the counter terrorist section of 15 the Crown Prosecution Service, and I at that time was 16 also working on some counter terrorism legislation with 17 the head of that service and I had a conversation with 18 her about my initial thoughts around this case and she 19 steered me to the special case division of the Crown 20 Prosecution Service, where I met the head of the Crown 21 Prosecution Service there, Carmen Dowd, and that's where 22 the actual confirmation of the interpretation of the law 23 came from.</b></p> <p>24 Q. The confirmation was to come fairly soon thereafter, but 25 at the time you wrote this review on 4 April, you were</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 writing it without legal advice; is that right?</p> <p>2 <b>A. I believe Sue Hemming had confirmed it verbally that it</b></p> <p>3 <b>sounded correct, but she was not the person to advise</b></p> <p>4 <b>me, and she was putting me in contact with Carmen Dowd.</b></p> <p>5 Q. Thank you.</p> <p>6 LORD JUSTICE LEVESON: You say that view never ever changed.</p> <p>7 Is that right?</p> <p>8 <b>A. It is correct. My belief is consistently that what the</b></p> <p>9 <b>law said was that for this to actually be a criminal</b></p> <p>10 <b>offence, the message had to be a new and unread message,</b></p> <p>11 <b>and we coined this analogy of what we call the unopened</b></p> <p>12 <b>envelope on a desk.</b></p> <p>13 LORD JUSTICE LEVESON: I think we'll probably have to return</p> <p>14 to that.</p> <p>15 MR JAY: It arises in relation to advice from counsel given</p> <p>16 on 2 August and then 21 August, but we'll look at that</p> <p>17 advice hopefully fairly soon. But the nature of the</p> <p>18 evidence that was available as at early April in terms</p> <p>19 of the call data we can see set out on the second page</p> <p>20 of this document. It was based on an analysis of</p> <p>21 outgoing data from Mr Goodman's home phone number.</p> <p>22 The third page of the document, on the internal</p> <p>23 numbering page 35, you point out that there are</p> <p>24 differences which we needn't explore today between</p> <p>25 access to Vodafone voicemails and access to O2</p> <p style="text-align: center;">Page 17</p>	<p>1 significant. At this stage the wishes of the victims</p> <p>2 against public interest needs to be factored in to the</p> <p>3 future direction of this enquiry."</p> <p>4 So you were beginning to point to a possible strain</p> <p>5 on resources; is that right?</p> <p>6 <b>A. Yes. Up to this stage in the enquiry, we've established</b></p> <p>7 <b>that what the royal household suspected was happening is</b></p> <p>8 <b>in fact possible. It is happening, there are a growing</b></p> <p>9 <b>number of potential victims within that area and now</b></p> <p>10 <b>we're at the stage where there are definitive criminal</b></p> <p>11 <b>offences that this could be breaching, that the</b></p> <p>12 <b>potential victims are willing to support a prosecution,</b></p> <p>13 <b>and therefore, if we want to take this forward, we now</b></p> <p>14 <b>would begin to need to convict -- sorry, give</b></p> <p>15 <b>investigative resources to this to take this forward.</b></p> <p>16 Q. Was Mr Clarke you were briefing content with that</p> <p>17 course, namely that additional resources would now be</p> <p>18 required?</p> <p>19 <b>A. Yes. I would brief this in to all three of my immediate</b></p> <p>20 <b>supervisors up to Mr Clarke, and in fact, to do that,</b></p> <p>21 <b>they gave me those resources.</b></p> <p>22 Q. At tab 25, which we're just going to glimpse at and then</p> <p>23 move on:</p> <p>24 "JLP made it clear that he was willing to be the</p> <p>25 primary victim and therefore a witness."</p> <p style="text-align: center;">Page 19</p>
<p>1 voicemails, and you were exploring the position as well</p> <p>2 in relation to O2, because it was relevant to one of the</p> <p>3 victims. At the bottom of the page we can see the</p> <p>4 conclusions:</p> <p>5 "Five to six potential victims have been</p> <p>6 identified."</p> <p>7 Pausing there, those were all victims within the</p> <p>8 royal household at that stage, weren't they?</p> <p>9 "The potential for voicemail interception has been</p> <p>10 demonstrated."</p> <p>11 And you say at the bottom:</p> <p>12 "This ability is highly unlikely to be limited to</p> <p>13 Goodman alone. It's probably quite widespread amongst</p> <p>14 those who would be interested in such access, a much</p> <p>15 wider security issue within the UK and potentially</p> <p>16 worldwide."</p> <p>17 So you were pointing there, true that this was</p> <p>18 a piece of speculation, to a potentially very serious</p> <p>19 problem, weren't you?</p> <p>20 <b>A. That's correct.</b></p> <p>21 Q. I should deal with the last page of tab 22, the second</p> <p>22 point you make. On the internal numbering it's page 36:</p> <p>23 "In terms of an investigation, taking this enquiry</p> <p>24 forward will impact on core SO13 operations and the</p> <p>25 resource implications for a prosecution could be</p> <p style="text-align: center;">Page 18</p>	<p>1 At tab 29, a decision log, decision number 16, you</p> <p>2 identify two groups of people within the royal</p> <p>3 household. There were about nine of them in all. The</p> <p>4 first group included three members of the Royal</p> <p>5 Family -- we can probably work out who they are but it</p> <p>6 isn't necessary to go further than that -- who were</p> <p>7 going to be warned specifically, but the second group</p> <p>8 were not going to be directly warned, because you were</p> <p>9 concerned -- and tell me if this is right or wrong -- to</p> <p>10 maintain the covert nature of the enquiry because you</p> <p>11 didn't want there to be any risk of material entering</p> <p>12 the public domain and your suspects being alerted; is</p> <p>13 that correct?</p> <p>14 <b>A. Yes, that's correct. At this stage, while we were</b></p> <p>15 <b>conducting a covert enquiry.</b></p> <p>16 Q. Allied to the need to maintain the covert nature of the</p> <p>17 enquiry was your belief that it needed to be kept within</p> <p>18 SO13, and we can see that from tab 31, Mr Williams. The</p> <p>19 sentence right in the middle of the page:</p> <p>20 "I highlighted the concern that in the light of the</p> <p>21 ATV's current operational commitment, it is right that</p> <p>22 we should continue to deal with this investigation</p> <p>23 because if it did become a prosecution, the media might</p> <p>24 seek to criticise the MPS and SO13 for the use of</p> <p>25 anti-terrorist resources against what, albeit is far</p> <p style="text-align: center;">Page 20</p>

<p>1 wider security implications of the voicemail networks, 2 appears to be a non-terrorist-motivated intrusion on the 3 privacy of a member of the Royal Family where 4 non-terrorist-related criminal offences have been 5 committed." 6 You put that as a question. What were you driving 7 at there, Mr Williams? 8 <b>A. I'm raising to my senior management that if we take this 9 forward to a final prosecution and it gets played out in 10 court, given the fact that we are under huge, huge 11 pressure in terms of our counter terrorism operations, 12 how is it right that the anti-terrorist branch is 13 dedicating investigating resources to something that 14 actually is not terrorism?</b> 15 <b>Equally, I was just raising the potential, 16 I suppose, public or media spin that might be put on it, 17 that we're potentially -- sometimes it's you're using 18 a sledgehammer to crack a nut. In other words, why are 19 you using anti-terrorist officers to investigate, for 20 example, this offence that has nothing to do with 21 terrorism? But that was -- I'm just raising the 22 concern. Equally, there were valid arguments for why we 23 should retain it. I was simply raising it and we were 24 considering: how does this look? Is it right that we're 25 committing these resources or an unknown number of</b> Page 21</p>	<p>1 <b>could be.</b> 2 Q. Thank you. At page 58, level with the upper hole punch, 3 you repeat the point that you need to prove messages 4 were intercepted by Goodman before they were read by the 5 intended recipient, and at page 59, under point 4, you 6 were referring to the possibility that further suspects 7 might be identified; is that so? 8 <b>A. Yes.</b> 9 Q. You got your advice from the CPS at tab 38. We needn't 10 look at the advice under the 1990 Act. The advice under 11 the 2000 Act is at the top of page 70, which is the 12 second page of this document: 13 "The offences under section 1 of RIPA would, as far 14 as I can see, only relate to such messages that had not 15 been previously accessed by the recipient. However, 16 this area is very much untested and further 17 consideration will need to be given to this. Again, the 18 actual technical evidence would need to be carefully 19 considered before any firm view could be taken about 20 whether the offence is capable of being proved." 21 I think -- is this your writing -- you've then 22 written "is it?" What does that relate to? 23 <b>A. I think it relates to -- let me just have a read.</b> 24 <b>(Pause).</b> 25 Q. If you're not sure -- Page 23</p>
<p>1 <b>resources to taking this forward? But there were good 2 reasons for why we should continue with it.</b> 3 Q. Thank you. Tab 35 next, please. Another review, 4 20 April. You reviewed the evidence, which hasn't 5 significantly changed since the previous review, but can 6 I ask you to look at point 7, which is at page 57. The 7 second bullet point: 8 "Potential victims have been identified through 9 examination of the Goodman home telephone." 10 There you're using "victim" in a limited sense, is 11 this correct, to include just those who you could prove 12 had been directly targeted by Mr Goodman? Have 13 I correctly understood it? 14 <b>A. Yes. I think I'm simply saying the ones that I've 15 listed earlier that we've been able to identify that 16 he's calling their unique voicemail numbers from his 17 home telephone. Those are the people that I'm referring 18 to.</b> 19 Q. In the third bullet point, I think you're using "victim" 20 in a wider sense to cover anybody who might be 21 compromised? 22 <b>A. This goes back to my very initial supposition that this 23 could be quite widespread. As I said in that -- as we 24 brought up, it could be throughout the UK, worldwide. 25 It's completely unknown speculation as to how wide this</b> Page 22</p>	<p>1 <b>A. No, I'm not sure. I know what I'd done is I received 2 this, I then phoned Carmen and I discussed it and went 3 through this, because if you look at where I put point 2 4 "or we go for a test purchase", because I was discussing 5 with her how do I technically evidence this? And I was 6 suggesting that I might have a test period where we 7 would monitor one of our potential victims' phone and 8 actually ask them not to answer or to retrieve their 9 voicemails, so in other words whoever was calling into 10 those -- if someone in the normal course of the day left 11 a message quite legitimately on Jamie 12 Lowther-Pinkerton's phone, we would ask him not to 13 answer it and then we would see whether or not the 14 technical data could actually pick up the leaving of 15 those messages, and indeed whether it would pick up the 16 retrieval of those unread messages by one of our rogue 17 numbers, and that's in fact one of the strategies that 18 we put into place.</b> 19 Q. Yes, because your concern was to avoid bringing the true 20 intended recipients of the messages into the witness box 21 in court to have to give evidence, because -- to put it 22 absolutely crudely -- you didn't want members of the 23 Royal Family to be placed in that potentially 24 embarrassing position; is that right? 25 <b>A. My concern was about the confidence of the victims. If</b> Page 24</p>

6 (Pages 21 to 24)

<p>1 <b>I looked forward planning for a trial in court, I was</b>                  2 <b>looking for what is the best evidence to make it</b>                  3 <b>absolutely clear and simple to a jury of exactly what is</b>                  4 <b>the wrongdoing here and the points to prove. What</b>                  5 <b>I didn't want happening, and I documented it in here, or</b>                  6 <b>in my decision logs, is the issue getting played out in</b>                  7 <b>court of who called who, why they were calling these</b>                  8 <b>people and what the contents of those messages may well</b>                  9 <b>have been, because they may have been embarrassing, for</b>                  10 <b>any reason, to my potential victim. And therefore, in</b>                  11 <b>order to maintain the confidence of my victim, I wanted</b>                  12 <b>to be able to assure them, if at all possible, that if</b>                  13 <b>they were going to be a victim in one of my cases, in my</b>                  14 <b>case, that this would be solely on the fact technically</b>                  15 <b>that one of their messages had been intercepted. Not</b>                  16 <b>the who or what it was about.</b></p> <p>17 Q. These matters are covered in tab 41, which is log entry                  18 number 21 dated 26 April. If I can paraphrase it, you                  19 did telephone Carmen Dowd, we can see that. You set out                  20 the options. The first option is to present a case                  21 based on technical data, and it has the advantages                  22 you've just explained for us.</p> <p>23 The second option, that it could be linked to the                  24 first, was the sting type operation which you've also                  25 told us about.</p> <p style="text-align: center;">Page 25</p>	<p>1 <b>equally obviously I was not going to consider doing</b>                  2 <b>nothing, because actually I very much wanted to do</b>                  3 <b>something.</b></p> <p>4 <b>Throughout this investigation, me and my team put</b>                  5 <b>a huge amount of effort into maintaining the support and</b>                  6 <b>confidence of the victims and working with the CPS and</b>                  7 <b>the phone companies to actually get this to trial. We</b>                  8 <b>wanted to bring this to court and to demonstrate that</b>                  9 <b>this was absolutely a criminal offence and was not to be</b>                  10 <b>tolerated.</b></p> <p>11 MR JAY: You make that clear in this document, but you also                  12 make it clear at page 77 on the internal numbering that                  13 you wanted to go back to Vodafone and O2 and ascertain                  14 or determine once and for all whether or not the                  15 technical data exists to be able to have a reasonable                  16 chance of mounting a prosecution against any suspects.                  17 Was this in order to demonstrate conclusively that the                  18 interceptions were taking place before the intended                  19 recipient accessed their voicemails?</p> <p>20 <b>A. That's correct. And actually I think it links into my</b>                  21 <b>option three. At the time, based on what I knew, there</b>                  22 <b>was always the option I could have gone and spoken to</b>                  23 <b>Mr Goodman, whether would that be as a suspect, and</b>                  24 <b>interviewed him. That option was open to me. And</b>                  25 <b>again, because I knew or I believed I didn't have enough</b></p> <p style="text-align: center;">Page 27</p>
<p>1 And then option three in the middle of the next                  2 page:                  3 "There's always the option to arrest now."                  4 And then you point out you might not have enough                  5 evidence if you did that.</p> <p>6 And then the last option at the bottom of the page                  7 is not to proceed any further with the criminal                  8 investigation.</p> <p>9 LORD JUSTICE LEVESON: You have actually identified                  10 potential crimes, both under RIPA and under the misuse                  11 computer legislation, Computer Misuse Act. In your                  12 paragraph 1 at the beginning:                  13 "This behaviour described does give rise to offences                  14 under section 1 RIPA and section 1 Misuse Computer Act,                  15 subject to appropriate evidence."</p> <p>16 <b>A. Yes. I was aware at that stage that there was</b>                  17 <b>potentially, potentially, evidence, again untested, and</b>                  18 <b>it still required further work to actually get that</b>                  19 <b>evidence, that some members of the royal household may</b>                  20 <b>have been having their unique voicemails intercepted.</b>                  21 <b>My actual criminal level of proof, as I understood</b>                  22 <b>it, in terms of it actually being a new, unlistened-to</b>                  23 <b>message, I hadn't got evidence of that. Here I'm just</b>                  24 <b>saying what are the potential options are. I'm not</b>                  25 <b>saying they're a good option or an advisable option, and</b></p> <p style="text-align: center;">Page 26</p>	<p>1 <b>evidence, he may well have made no comment and that may</b>                  2 <b>well have been the end of the matter.</b></p> <p>3 <b>In terms of how I want to investigate, I actually</b>                  4 <b>want to be able to have as much evidence as possible, so</b>                  5 <b>that when I do go and ask people, that there is the fair</b>                  6 <b>opportunity to put all the matters that I'm aware of</b>                  7 <b>them and to actually have as strong a case as possible.</b></p> <p>8 <b>So what you're asking there was indicative of</b>                  9 <b>I didn't believe I had the evidence, I absolutely did</b>                  10 <b>need the phone company's support to get me that</b>                  11 <b>evidence, I wasn't going to go and speak to Mr Goodman</b>                  12 <b>at this time because I didn't believe it would get me</b>                  13 <b>anywhere. I needed to build my case before I actually</b>                  14 <b>confronted the issue.</b></p> <p>15 Q. And that's made clear again by tab 50, 9 May 2005.                  16 These are all your documents?</p> <p>17 <b>A. They are all my documents.</b></p> <p>18 Q. At the bottom of that page you say:                  19 "Vodafone may have some historic data."                  20 But in the last bullet point:                  21 "Both Vodafone and O2 have technical equipment that                  22 could be used to actively monitor the activity in                  23 relation to JLP and HA's mobile phones which over an                  24 appropriate test period could be used to evidence the                  25 date and time and possibly which phone numbers were</p> <p style="text-align: center;">Page 28</p>

<p>1 accessing their voicemail boxes in addition to their own                  2 legitimate access. Both companies are willing to                  3 support a prosecution."                  4 Now that was, moving forward, a sting operation                  5 which started in May and continued into June and you                  6 decided to carry out --                  7 LORD JUSTICE LEVESON: This is 2006, not 2005, isn't it?                  8 MR JAY: Yes.                  9 <b>A. Yes.</b>                  10 LORD JUSTICE LEVESON: There's a typo.                  11 <b>A. Sorry, yes.</b>                  12 <b>I think it's important to explain here this</b>                  13 <b>demonstrates what the phone companies were telling us.</b>                  14 <b>This was new to them. They didn't realise this could be</b>                  15 <b>done.</b>                  16 <b>Equally, I think it's important to understand they</b>                  17 <b>have engineering software that runs their everyday</b>                  18 <b>system, and what they're telling us is it's news to them</b>                  19 <b>that this was -- that people were able to do this in</b>                  20 <b>this fashion, and actually their own engineering</b>                  21 <b>software, although it could show what we called the</b>                  22 <b>rogue numbers coming into the unique voicemail number,</b>                  23 <b>it had difficulty in telling them what was going on in</b>                  24 <b>the voicemail box.</b>                  25 <b>In fact, it was actually they couldn't tell us</b>                  Page 29</p>	<p>1 this vulnerability and there may well be a host of                  2 people using this vulnerability for journalistic                  3 purposes. The Goodman connection is potentially an                  4 example of this, but the more sinister side would be the                  5 knowledge could be equally utilised by criminals,                  6 whether that be in the general sense for terrorism or to                  7 threaten national security. Therefore I believe that                  8 this matter has a significant public interest aspect to                  9 it, particularly in terms of safety and security, the                  10 ultimate risk being a threat to life."                  11 Now, in your view, did those public interest                  12 considerations subsist throughout your investigation?                  13 <b>A. At that time I was entirely open to the speculation this</b>                  14 <b>could be a technique used across all media and equally,</b>                  15 <b>as I've said, potentially the criminal world were aware</b>                  16 <b>of it. The things that actually didn't necessarily</b>                  17 <b>reinforce that is, for example, at no time did any of</b>                  18 <b>the phone companies, once they were fully aware of the</b>                  19 <b>potential risk to their systems and what that intrusion</b>                  20 <b>looked like, at no time did they come back to me and</b>                  21 <b>say, "Actually, we've seen that this is happening all</b>                  22 <b>over our system". Partly, to be absolutely fair to</b>                  23 <b>them, it's because we don't -- they don't know, because</b>                  24 <b>of their software engineering, exactly what was</b>                  25 <b>happening. So it is an unknown. It might be happening.</b>                  Page 31</p>
<p>1 <b>whether a message actually existed in the mailbox, and</b>                  2 <b>therefore they were using some more specialist software</b>                  3 <b>engineering specifically targeted around some of our</b>                  4 <b>potential victims, namely Jamie Lowther-Pinkerton, in</b>                  5 <b>this test period, to see if we could get a more accurate</b>                  6 <b>picture of what was going on, and ultimately for me,</b>                  7 <b>whether or not it would come to that level of proof to</b>                  8 <b>be able to demonstrate that a new message had been</b>                  9 <b>intercepted.</b>                  10 MR JAY: You assessed the various options open to you. The                  11 first one was: no further investigation, which you                  12 rejected at the top of page 96, because those                  13 responsible would have (inaudible) been brought to                  14 justice and the public interest would not be served.                  15 You then considered option two, hand over                  16 investigation to another police unit, but you rejected                  17 it at that stage because your unit had developed                  18 a relationship with the royal household and had built up                  19 their confidence.                  20 Option three was carrying out or commencing a formal                  21 investigation with a view to prosecution, and that is                  22 the option which you decided to pursue, at least in the                  23 short term, that's the top of page 97, and the reason                  24 given, which is highlighted, really:                  25 "I suspect that the media world may well be aware of                  Page 30</p>	<p>1 Q. Sorry to cut you short, but I think the question was                  2 more targeted to whether the public interest you've                  3 identified subsisted throughout the investigation, and                  4 the answer is either yes or --                  5 <b>A. Do you mean was the same?</b>                  6 Q. Yes.                  7 <b>A. Sorry, it's my -- I think, no, it changed, because in</b>                  8 <b>terms of some of the checks I did, for instance within</b>                  9 <b>the counter terrorism world, assured me, as far as I was</b>                  10 <b>able, that this was not necessarily a technique that was</b>                  11 <b>being actively used by some of the other subjects that</b>                  12 <b>we would have been interested as part of the</b>                  13 <b>anti-terrorist branch. Equally, I had spoken to</b>                  14 <b>colleagues, both within the anti-terrorist branch and</b>                  15 <b>the special crime directorate, to find out whether any</b>                  16 <b>of them had come across this type of criminality before.</b>                  17 <b>They hadn't. Equally, with the Crown Prosecution</b>                  18 <b>Service, they had never come across a case like this.</b>                  19 Q. Yes.                  20 <b>A. So to my mind what this was -- as the enquiry went on,</b>                  21 <b>this was a technique that was used by people who wanted</b>                  22 <b>to gain private information about people and not --</b>                  23 <b>obviously not acceptable, but it was going to be used in</b>                  24 <b>terms of media as opposed to threat to life, physical</b>                  25 <b>harm.</b>                  Page 32</p>



<p>1 Q. I understand.</p> <p>2 <b>A. So it reduced in that sense.</b></p> <p>3 Q. Can I take it forward to tab 61, which is update 21 June</p> <p>4 2006. You've been away for a time, I think, on official</p> <p>5 business, Mr Williams, where you were out of the United</p> <p>6 Kingdom.</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. You came back, you picked up the cudgels again on</p> <p>9 5 June. You identify that the sting operation or test</p> <p>10 period concluded on 16 June, and what you're doing here</p> <p>11 is setting out what the fruits of that operation were.</p> <p>12 Under "Assessment" we see this:</p> <p>13 "Lindsay confirmed that by examining the vampire</p> <p>14 data ..." this is the specialist Vodafone data?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. "... in our test period, she has identified two</p> <p>17 interceptions of voicemail by Goodman and two by the</p> <p>18 phone number attributed to Mulcaire."</p> <p>19 Those were interceptions which related to members of</p> <p>20 the royal household alone; is that correct?</p> <p>21 <b>A. That's correct.</b></p> <p>22 Q. Then you say:</p> <p>23 "Having been briefed and shown the available data</p> <p>24 for both misuse of computer and interception offences,</p> <p>25 at this stage Mr Bristow's [he was the expert who was</p> <p style="text-align: center;">Page 33</p>	<p>1 any future overt operational activity will need to be</p> <p>2 balanced against the whole of SO13 priorities."</p> <p>3 So that was putting down a firm marker to Mr Clarke</p> <p>4 and others that you were under pressure, is that fair?</p> <p>5 <b>A. No. Actually, my intention here was I had been at that</b></p> <p>6 <b>meeting that morning. This was a moment of reflection.</b></p> <p>7 <b>I just wanted to put in my document that we are</b></p> <p>8 <b>actually -- I'm happy with the resourcing on this</b></p> <p>9 <b>operation, but just for context, this is the operational</b></p> <p>10 <b>background that we are against, and we are actually</b></p> <p>11 <b>unable to commit the resources to all of the operations</b></p> <p>12 <b>that we would want to, purely because we didn't have</b></p> <p>13 <b>enough staff, and our judgment at that time, both me as</b></p> <p>14 <b>an SIO right the way up to Mr Clarke ultimately, was</b></p> <p>15 <b>a balance of risk and harm, and we judged that very much</b></p> <p>16 <b>on the potential, the imminence of what that threat to</b></p> <p>17 <b>life might be, judging it against different operations,</b></p> <p>18 <b>and there were often times when one operation would</b></p> <p>19 <b>suddenly rise to precedence because there was something</b></p> <p>20 <b>that meant that we felt that the risk and the threat to</b></p> <p>21 <b>life had suddenly increased and we would have to act on</b></p> <p>22 <b>that operation. So it was a continual judgment every</b></p> <p>23 <b>day ultimately by Mr Clarke about how and which</b></p> <p>24 <b>operations would get what resources.</b></p> <p>25 <b>But at this stage, for what we were doing under the</b></p> <p style="text-align: center;">Page 35</p>
<p>1 analysing the data] assessment is that we have</p> <p>2 a reasonably strong case."</p> <p>3 And then he set out what the position might be.</p> <p>4 And then on the next page, file note on resources:</p> <p>5 "For the moment I consider I have enough resources</p> <p>6 to continue with this enquiry in terms of what is</p> <p>7 currently required. However, I believe it is important</p> <p>8 to formally record that this investigation has been</p> <p>9 conducted against a backdrop of sustained and increasing</p> <p>10 workload for SO13 since at least December 2005. Over</p> <p>11 that period the number of operations has increased from</p> <p>12 numbers in the 50s to today at tasking where we've</p> <p>13 reached 72 active operations with a number of them</p> <p>14 posing significant life-threatening risks. Today again</p> <p>15 at tasking, as in previous weeks, there were requests</p> <p>16 for additional resource, with there no longer being any</p> <p>17 spare capacity. This has resulted in some lower</p> <p>18 priority anti-terrorist operations being placed on hold</p> <p>19 to release officers to higher priority operations. The</p> <p>20 level of the current workload is unprecedented and the</p> <p>21 assessment for the future is that this is unlikely to</p> <p>22 ease. Operation Caryatid has been brought to its</p> <p>23 current status against this backdrop and the need to</p> <p>24 balance resources against all anti-terrorist operations.</p> <p>25 "Subject to the stages outlined above, the scope of</p> <p style="text-align: center;">Page 34</p>	<p>1 <b>objectives that I was given, I was satisfied that I had</b></p> <p>2 <b>enough resources for what we were tasked to do.</b></p> <p>3 Q. Yes. Thank you. You receive advice from the CPS at</p> <p>4 tab 70 on 18 July. We will have to take this one quite</p> <p>5 shortly. And the advice was:</p> <p>6 "The case appears to be cogent and presentable and</p> <p>7 could proceed without the need to delve into the content</p> <p>8 of any messages left and/or retrieved."</p> <p>9 That's the top of page 139. Although certain</p> <p>10 caveats were then expressed, which we needn't dwell on.</p> <p>11 Tab 74 is possibly more important, Mr Williams.</p> <p>12 Another briefing for Mr Clarke as at 20 July 2006. You</p> <p>13 say in the middle of the first page of this document,</p> <p>14 internal numbering page 180, under "Number of victims":</p> <p>15 "I am aware from O2 that there may well be a much</p> <p>16 wider range of victims. Indeed I suspect that Mulcaire</p> <p>17 could well be someone whose business it is to secure</p> <p>18 access to information concerning a whole range of VIPs."</p> <p>19 Again a very prescient observation, isn't it?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. "Some of the choices I have are: extend the</p> <p>22 investigation to include the full extent of this</p> <p>23 potential criminality, which would help to establish the</p> <p>24 seriousness of what we are facing. However, to do this</p> <p>25 effectively, the enquiry would probably have to remain</p> <p style="text-align: center;">Page 36</p>

<p>1 covert, which would leave my known and unknown victims 2 vulnerable over a much greater period of time." 3 It would also swallow up resources, I paraphrase. 4 So this was a balancing exercise. The longer this 5 went on without arrests, the greater the risk was to the 6 potentially expanding pool of victims; is that right? 7 <b>A. Absolutely. That's my role as the SIO is to judge the</b> 8 <b>balancing risks.</b> 9 Q. And then the other option was to extend the enquiry 10 incrementally but somehow try to limit the extent to 11 which you discover victims. The advantage of that would 12 give you more vision. Your decision was: 13 "I've decided to keep the enquiry limited to the 14 victims I can use within the household. Rationale: 15 I would include the reasons I've cited above for not 16 extending the enquiry because strictly speaking I'm 17 dealing with the victims that have actually come 18 forward." 19 Then you say on the next page: 20 "The penalties for these offences are relatively 21 small ..." 22 <b>A. Sorry, can I ask which page have you gone to?</b> 23 Q. 181, two lines from the top. 24 <b>A. Yes.</b> 25 Q. "The penalties for these offences are relatively small.</p> <p style="text-align: center;">Page 37</p>	<p>1 And what you're moving to is to arrests in the 2 fairly near future, is that so? 3 <b>A. That's correct.</b> 4 Q. And that was established further discussions and did 5 Mr Clarke, having been briefed, accept the course of 6 action which you proposed or did he propose something 7 different? 8 <b>A. No, this was accepted.</b> 9 Q. From the end of July until 12 August, you were on leave, 10 and therefore self-evidently weren't there at the time 11 of the arrests, which were on 8 August, but you were 12 briefed all about it, as we're going to hear, by 13 Mr Surtees. You returned from leave on the Saturday, 14 which is 12 August, and by then, of course, had 15 intervened Operation Overt, which was 9 August, and that 16 was the plot to blow up aeroplanes, I think nine of 17 them, over the Atlantic? 18 <b>A. That's correct.</b> 19 Q. And that, as you explain in paragraph 30, was also 20 occupying your time. 21 Can I ask you, please, in the middle of paragraph 30 22 of your witness statement when you say you received 23 a full brief from Keith Surtees concerning the 24 circumstances of the arrest, the items found and the 25 processes that he put in place to assess the material,</p> <p style="text-align: center;">Page 39</p>
<p>1 Even if I added 100 more victims, it is unlikely that 2 I will allow the judge much scope for adding 3 a significantly increased sentence." 4 Was that the advice that you eventually received 5 from leading counsel, that the number of victims 6 wouldn't make a big difference to the sentence? 7 <b>A. That's correct.</b> 8 Q. You're not dealing here, is this right, with the 9 separate proposition that if you brought in further 10 defendants the position would change; you're looking 11 only at the number of victims, aren't you? 12 <b>A. Yes.</b> 13 Q. At this point, you had in mind the possibility of those 14 other than Goodman and Mulcaire who might be involved in 15 this conspiracy; is that correct? 16 <b>A. Yes.</b> 17 Q. Then you deal again at 181 with keeping this within 18 SO13, which we needn't go into, since the reasons are 19 similar to the reasons we've seen earlier. 20 Page 182, the timing of executive action. By 21 "executive action" you mean arrests; is that right? 22 <b>A. Yes.</b> 23 Q. "The covert nature of this enquiry means that both the 24 known and unknown victims of this alleged criminality 25 are vulnerable and potentially suffering."</p> <p style="text-align: center;">Page 38</p>	<p>1 can I be clear about this: did Mr Surtees explain to you 2 the difficulties there had been on the day, namely that 3 News International or some members of News International 4 had been, in the police's view, obstructive? 5 <b>A. Yes, he did.</b> 6 Q. Did he draw your attention to what we now know to be or 7 are calling the "for Neville" email? 8 <b>A. I don't know whether we knew about it at that time.</b> 9 <b>Some time between the arrests and the prosecution, we</b> 10 <b>did know about it. I don't know when we knew about it.</b> 11 Q. Thank you. And did he explain to you what had happened 12 during the course of interview of both Mr Mulcaire and 13 Mr Goodman? 14 <b>A. Yes.</b> 15 Q. Can I just deal with one or two points which came out of 16 the interview. File 2 in these files. First of all, 17 tab 123. Just a miscellany of points, if I can pick 18 them up, whether you were told about these. 19 First of all, page 643. This is interview of 20 Mulcaire, 9 August. All these interviews are "no 21 comment" interviews. The middle of the page, DC Green 22 draws Mr Mulcaire's attention to the £7,000 contract 23 with Paul Williams. Of course, he's the alias of 24 Mulcaire. And that contract was found at Mulcaire's 25 home address in relation to a story. That's a piece of</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 evidence which the Select Committee and others have 2 alighted on. 3 <b>A. Mm.</b> 4 Q. Was that drawn to your attention at the time or shortly 5 afterwards? 6 <b>A. I would have known that there were a number of payments,</b> 7 <b>yes.</b> 8 LORD JUSTICE LEVESON: Well, I think you probably understand 9 this context: before either Mr Mulcaire or Mr Goodman 10 were interviewed, the police will have analysed broadly 11 what they'd got, because they'd want to know what 12 questions to ask. 13 <b>A. Mm.</b> 14 LORD JUSTICE LEVESON: And presumably you were briefed on 15 the result, the evidence that had emerged in the 16 investigation as a result of the searches. 17 <b>A. Yes.</b> 18 LORD JUSTICE LEVESON: So this is merely a manifestation of 19 what they'd found out. The questions they asked. You 20 would be more interested to know what did you learn, 21 rather than just look at the interviews. Would that be 22 fair? 23 <b>A. Yes, my briefing would be that they'd been interviewed</b> 24 <b>in full, I know the range of material that's been found,</b> 25 <b>I know and I'm satisfied that that range has been put to</b> Page 41</p>	<p>1 <b>include politicians, where it may be that they are</b> 2 <b>potentially people who Mulcaire or others might want to</b> 3 <b>target in terms of their voicemail.</b> 4 LORD JUSTICE LEVESON: So they were certainly targets. What 5 you couldn't say was whether they had actually been 6 victims. 7 <b>A. This was our challenge. I'm well aware that there are</b> 8 <b>potentially a wide range of people. I'm also aware at</b> 9 <b>the time that this is -- Glenn Mulcaire -- sorry, Clive</b> 10 <b>Goodman is a reporter, he's a journalist.</b> 11 <b>Glenn Mulcaire is working for them. It is not going to</b> 12 <b>be unusual to find all these names about people in</b> 13 <b>public life.</b> 14 <b>My mindset then was that he is -- Glenn Mulcaire is</b> 15 <b>getting information, presumably for the media world, and</b> 16 <b>he may well be using a whole range of different</b> 17 <b>techniques, and some of these techniques may well be</b> 18 <b>distasteful to the public, but many of them may well be</b> 19 <b>lawful and others may well be illegal.</b> 20 MR JAY: The one we're looking at, though, in relation to 21 Mr Prescott is precisely the same sort of technique as 22 was deployed in relation to the royal household, wasn't 23 it? 24 <b>A. Actually, I don't know that. I do not know -- as far as</b> 25 <b>I'm aware, Mr Prescott, I don't know that he has been</b> Page 43</p>
<p>1 <b>them as potential suspects to give them the opportunity</b> 2 <b>to account for their behaviour, and they have chosen to</b> 3 <b>make no comment.</b> 4 MR JAY: Yes. Just one other piece of information, because 5 one witness mentioned it. Page 660. The top of the 6 page. This is material relating to John Prescott, who 7 of course then was the Deputy Prime Minister: 8 "There's another name underneath. First of all, it 9 says 'adviser' and then the name 'Joan Hammell'. You've 10 got her telephone numbers, DM1 numbers, password numbers 11 and Vodafone password that I have already mentioned, and 12 an address in NW1. Have you got that information to 13 access John Prescott's network or that of his advisers?" 14 And then the answer: 15 "No comment." 16 Was that information imparted to you, Mr Williams, 17 namely that we were looking at someone clearly outside 18 the ambit of the royal household, and moreover there was 19 a range of evidence which tended to establish that, at 20 the very least, Mr Mulcaire had the wherewithal to hack 21 into Mr Prescott's phone or Ms Hammell's phone? 22 <b>A. I don't know whether I knew that specific bit in the</b> 23 <b>sense of it sat here in this interview. What I was</b> 24 <b>briefed about was, yes, there are now from the material</b> 25 <b>a number of other people in all walks of life, that</b> Page 42</p>	<p>1 <b>a victim of interception. I didn't know that at the</b> 2 <b>time.</b> 3 Q. There are two -- don't worry about whether Mr Prescott 4 had been proven to be a victim of interception. We're 5 looking at the trade craft of Mr Mulcaire. 6 Mr Mulcaire's trade craft, as borne out by the material 7 you seized, was consistent throughout all the potential 8 victims, wasn't it? He was building up enough material 9 to be able to hack into their voicemails, wasn't he? 10 <b>A. Yes. From our voicemail analysis of the data on the</b> 11 <b>royal household, it was the analysis of the voicemail</b> 12 <b>data that showed us the pattern of the behaviour.</b> 13 <b>I knew what was happening in terms of the royal</b> 14 <b>household because that's the evidence that was presented</b> 15 <b>at court. Actually, I have no reason to suspect he</b> 16 <b>wasn't doing that with these other people either. Yes,</b> 17 <b>that's correct.</b> 18 Q. Yes. 19 LORD JUSTICE LEVESON: And indeed the details that you were 20 getting from the documentation about which you would 21 have been briefed, which included what were apparently 22 mobile phone numbers and PIN numbers, certainly point in 23 that direction. 24 <b>A. There was a whole range of numbers. Ordinary telephone</b> 25 <b>numbers, mobile telephone numbers, home addresses. Some</b> Page 44</p>

1 of the things may well be quite legitimately in the  
 2 possession of people like Glenn Mulcaire or  
 3 Clive Goodman, because it was an amalgam of both their  
 4 material.  
 5 At that time I was open to that, yes, they were  
 6 using some of the material in terms of voicemail  
 7 interception, that is clear. Glenn Mulcaire may well  
 8 have been doing a number of other things to get  
 9 information, but I didn't know what he was doing. What  
 10 I knew he was doing was in relation to the victims that  
 11 had started with the royal household, were now beginning  
 12 to look there might be other people, and what I was  
 13 looking was specifically at voicemail interception.  
 14 MR JAY: Tab 94, which is file 1, was the list which was  
 15 compiled of those potentially compromised. A number of  
 16 questions about this. You did not give the instruction  
 17 to start compiling this list; Mr Surtees did. Do you  
 18 know how long it took to compile this list?  
 19 **A. I believe it was about a week. It certainly went over**  
 20 **a weekend. It was a team of officers, they were working**  
 21 **extended hours. (Witness dropped box). I apologise.**  
 22 Q. Don't worry. So you think it took about a week. There  
 23 are 418 --  
 24 LORD JUSTICE LEVESON: Don't worry, Mr Williams. That's the  
 25 least of our concerns.

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1 MR JAY: 418 or 419 names on this list. Was it your belief  
 2 that all the Mulcaire notebooks were analysed, all  
 3 11,000 pages, or a more limited sample?  
 4 **A. It was my belief that all the material that we -- had**  
 5 **been seized for both Mulcaire and Mr Goodman had been**  
 6 **gone through within the parameters that Keith Surtees**  
 7 **said, which were to certainly identify the key people,**  
 8 **potentially, who may well have been of interest to both**  
 9 **of those men. Certainly as at that stage we were also**  
 10 **going ahead with a prosecution to satisfy our duties**  
 11 **under disclosure that we would have under any**  
 12 **prosecution, and also to see the extent of whether there**  
 13 **was anything here to be a concern in terms of national**  
 14 **security. He wrote those in his log and that's what**  
 15 **I was aware that they were doing.**  
 16 Q. So when you use the adjective "definitive" in  
 17 paragraph 30, you're using it in its precise sense, that  
 18 you believe that this list covers everything, all the  
 19 material that was seized. Is that right?  
 20 **A. I believed that this was absolutely representative of**  
 21 **the scale of the potential pool of people who may have**  
 22 **been of interest to those two men.**  
 23 Q. Why was leading counsel told on 21 August that there  
 24 were 200 victims, not at least 418 or 419?  
 25 **A. In my notes? We are there discussing the potential for**

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1 **how big our pool should be of potential victims, and we**  
 2 **were talking in terms of hundreds, whether it be 100,**  
 3 **200, and this is where I believe I've written 5 or 6.**  
 4 **This is where counsel confirmed my view, but it didn't**  
 5 **matter how many hundreds of victims beyond -- and**  
 6 **I think it was the term used, "beyond 100", that that**  
 7 **would make no difference to the ability of a court to**  
 8 **give a bigger sentence.**  
 9 **So my knowledge in terms of a potential pool was**  
 10 **largely based on what this document ultimately ended up**  
 11 **as, but this was -- I'm not sure --**  
 12 Q. But this document shows 418 and not 200. That was the  
 13 only question. It wasn't further points which arose to  
 14 you in conference with counsel which we're going to come  
 15 to in a moment.  
 16 **A. Okay.**  
 17 Q. Do you see that, Mr Williams?  
 18 **A. Yes.**  
 19 Q. I just wondered why leading counsel was told apparently  
 20 200 -- it does look like 800 but I accept your evidence  
 21 that it's 200 -- when we know it's 418. Is there  
 22 a reason for that?  
 23 **A. I know in my victims document, informing potential**  
 24 **victims, I believe at that time I'm talking about**  
 25 **potential for 180 victims, I think I mentioned. This**

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1 **was a developing picture of the potential victims, and**  
 2 **therefore I'm just giving an indicative amount of what**  
 3 **the potential pool may be.**  
 4 **For me, though, this document, as a completed**  
 5 **document, was my reference point in terms of what that**  
 6 **scale may be from the material that we had gone through.**  
 7 Q. Maybe it was you're saying it's the outer limit of the  
 8 number of victims. If one takes a quick look at this  
 9 document, tab 94, we can see that some of the victims  
 10 are, without being flippant, well outside the interests  
 11 of the royal correspondent of the News of the World. We  
 12 have a convicted paedophile, we have Mail on Sunday, we  
 13 have state securities, we have "reporter, bogus prison  
 14 guard?". It was pretty obvious that other journalists  
 15 were involved or could well be involved, wasn't it?  
 16 **A. This column that is filled in in terms of who these**  
 17 **people may be, as I understand it, this is the team that**  
 18 **were doing the completion of this document, this is**  
 19 **their view of who these people may be. And it may well**  
 20 **be they've done some Internet research in terms of who**  
 21 **they are, because a lot of these people frankly I didn't**  
 22 **know who they were or what their interest is, but you're**  
 23 **right, it shows a wide range of people, some of whom**  
 24 **would probably be, yes, they're obviously a well-known**  
 25 **person, and some people I wonder -- I don't know who**

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<p>1 <b>they are and I don't know what the significance is of</b>  2 <b>why they would be recorded here.</b>  3 Q. Did you at any stage come to examine the notebook and  4 see what we're calling the corner names?  5 <b>A. I have seen a range of material as examples of that</b>  6 <b>material, where in the corner, yes, you would get names,</b>  7 <b>first names of people written.</b>  8 Q. Whenever Goodman is involved, the corner name is  9 "Clive", isn't it?  10 <b>A. I don't know whether that's actually true, because we</b>  11 <b>never went through all the material to that exhaustive</b>  12 <b>length.</b>  13 Q. But you know that there were other corner names which  14 weren't "Clive".  15 <b>A. Yes.</b>  16 Q. Given that we have a corner name that's "Clive" and  17 other corner names that weren't "Clive", it's a pretty  18 strong inference that the corner name was a clue, at  19 least, to who was instructing Mulcaire to carry out the  20 interception. Is that right?  21 <b>A. Yes, absolutely. That was our supposition, that</b>  22 <b>potentially the names in the corner were the person who</b>  23 <b>had potentially either instructed them or for whom</b>  24 <b>Mulcaire was doing the work.</b>  25 Q. Did you --</p> <p style="text-align: center;">Page 49</p>	<p>1 <b>A. I knew there were a range of names, and yes, "Clive"</b>  2 <b>could obviously be Clive Goodman. To actually build</b>  3 <b>a case, obviously I would look to substantiate that it</b>  4 <b>was Clive Goodman. With other names, no, I didn't</b>  5 <b>necessarily know that they were people from News of the</b>  6 <b>World. I was still open to the possibility that, yes,</b>  7 <b>these were people who were tasking him, but they could</b>  8 <b>be from any organisation. If I was going to actually</b>  9 <b>put that before a court, I would have to find out who</b>  10 <b>those people were, what organisation they work for, and</b>  11 <b>present that as a cogent case.</b>  12 Q. The only other possibility was another newspaper, wasn't  13 it?  14 <b>A. And in the sense that this looked like it was the media</b>  15 <b>world that was paying this, absolutely. It's highly</b>  16 <b>likely that it would be another newspaper.</b>  17 <b>But all I would say is, and I know from the way</b>  18 <b>Mulcaire produced his business, for instance, he had</b>  19 <b>a leaflet that said what his business was, he was</b>  20 <b>offering general security advice and security protection</b>  21 <b>to the outside world, and there is always the</b>  22 <b>possibility that other people are asking him, as</b>  23 <b>a private investigator, to do work for him.</b>  24 Q. I'm sure there's always that possibility. I'm just  25 talking about the common sense probabilities --</p> <p style="text-align: center;">Page 51</p>
<p>1 <b>A. Sorry, I was going to say, what's important to remember:</b>  2 <b>what was absolutely absent from this material in any</b>  3 <b>shape or form is we didn't see anything coming in to</b>  4 <b>Mr Mulcaire in terms of the search of his computers of</b>  5 <b>the material that would say from whoever, "I would like</b>  6 <b>you to do whatever in terms of this person", nor did we</b>  7 <b>see -- so we didn't see any requests, if this was his</b>  8 <b>business, for work. Nor did we see anything from him in</b>  9 <b>terms of the outcome, what it was that he did and who he</b>  10 <b>sent it to and how he billed it. In the sense of</b>  11 <b>a business, there was no request --</b>  12 Q. The evidence of the request was the corner name, wasn't  13 it?  14 <b>A. It is indicative, I agree. I agree that, yes, that</b>  15 <b>could well be the person, but from my point of view of</b>  16 <b>an investigation, I, in the same way that I built the</b>  17 <b>criminal case against Glenn Mulcaire and Clive Goodman,</b>  18 <b>I would need to build that case to actually prove that</b>  19 <b>in a court.</b>  20 Q. Did you associate any of the corner names, which were,  21 after all, first names, with employees of News of the  22 World? In other words, if we have "Bill", for example,  23 did you start to say to yourself, well, Bill is an  24 employee at the news desk of the News of the World? Did  25 you go through that process?</p> <p style="text-align: center;">Page 50</p>	<p>1 <b>A. Yes.</b>  2 Q. -- or enough evidence to lead you down a line of  3 enquiry. Do you understand what I'm getting at here?  4 <b>A. Oh no, I absolutely agree with you. Here is the initial</b>  5 <b>starter, as we always propositioned, that this could be</b>  6 <b>more widespread.</b>  7 Q. Okay. The other evidence, real evidence which was  8 material, was tab 95, which is a review of audio  9 exhibits. There's just one item I'd like you to look  10 at, which is WAB66, page 289. I'm afraid this is very  11 difficult to read:  12 "Four(?) items split from this exhibit that are now  13 other exhibits. Transcripts of details of  14 friend/relative of victim of crime and victim of crime.  15 What appears to be details of voicemail messages from  16 someone to victim of crime. Comprehensive list of  17 personal details of Mulcaire's subjects, including  18 telephone numbers, DDNs, passwords, et cetera."  19 And then there's a reference to Mr Simon Hughes  20 a bit later on. So you had some evidence, but I think  21 it was fairly limited, of voicemail messages which were  22 on tape; is that right?  23 <b>A. Yes. There were a number of tapes that were seized and</b>  24 <b>there were a whole range of conversations on those</b>  25 <b>tapes.</b></p> <p style="text-align: center;">Page 52</p>

<p>1 MR JAY: Thank you. There was a conference with counsel on 2 21 August, which is tab 131 in file 3. Maybe we should 3 have our short break before we look at tab 131. 4 LORD JUSTICE LEVESON: Yes. 5 (11.26 am) 6 (A short break) 7 (11.34 am) 8 MR JAY: Mr Williams, we're on to now the case conference 9 with leading and junior counsel, 21 August 2006. 10 Tab 131, which is 03612, the last five of our URN 11 numbers. We're hoping now it might come up on the 12 screen, but apparently they haven't been. Yes. 13 21 August 2006. 14 Can I ask you, please, first of all your 15 instructions or rather it would be the CPS' instructions 16 to counsel, did that include any information which 17 related to other journalists at the News of the World or 18 not? 19 <b>A. Do I know what CPS told counsel?</b> 20 Q. Yes. 21 <b>A. I don't know what they told counsel.</b> 22 Q. An issue did arise in 2009 as to what instructions 23 counsel were given. We can just pick this point up, if 24 you don't mind, at file 4, tab 163. I think I can just 25 refer to this without us necessarily looking at it at</p> <p style="text-align: center;">Page 53</p>	<p>1 Q. May we look again at the note of the conference? If you 2 look at level with the lower hole punch "Total victims", 3 that should say 200, should it? 4 <b>A. 200.</b> 5 Q. It's 200. "Numbers UVN for example 100." What's that 6 a reference to? 7 <b>A. This is our discussion around the potential how many 8 victims do we need to show a potential -- the potential 9 scale of this, so I'm simply saying UVNs is unique 10 voicemail numbers, so if, for example, we have got 100 11 people, or 100, yes, victims, if it were, whose UVNs 12 have been rung, how many victims do we need to represent 13 that scale, and the assessment was we need to look for 14 perhaps another four to six. This is on top of what our 15 royal household victims may --</b> 16 Q. I understand. Then can we look down a bit. Do you see 17 "anyone else's involvement"? Or "anyone's else 18 involvement" is the way you put it. It's the third 19 point. 20 <b>A. Yes. This is our discussion, is there anyone else's 21 involvement, and yes, we were all aware of our 22 speculation, which then leads on to the next one, which 23 is we were discussing the issue of a production order.</b> 24 Q. Thank you. 25 <b>A. And again -- sorry.</b></p> <p style="text-align: center;">Page 55</p>
<p>1 this stage. What leading counsel and junior counsel 2 said on 14 July 2009: 3 "We did enquire of the police at a conference 4 whether there was any evidence that the editor was 5 involved, and we were told that there was not and we 6 never saw any such evidence." 7 Does that accord with your recollection or not? 8 <b>A. I agree with that. We didn't have evidence.</b> 9 Q. But according to counsel's memorandum, "we were told 10 that there was not", is that right or wrong? 11 <b>A. I'm well aware that they were aware of our speculations, 12 but in terms of strictly having evidence, we didn't.</b> 13 Q. "We also enquired whether there was any evidence 14 connecting Mulcaire to other News of the World 15 journalists. Again we were told that there was not, and 16 we never saw any such evidence." 17 Is that correct or not? 18 <b>A. Again, it's correct in the sense we were all aware of 19 what the speculations, potentially how this might be 20 further than these two men, because that was part of our 21 discussion in terms of considering whether or not there 22 may be other defendants. In terms of there actually 23 being evidence, and they had access to all the material, 24 then I would agree: at that time, we didn't have 25 evidence.</b></p> <p style="text-align: center;">Page 54</p>	<p>1 Q. "On scope of case at moment pursue production order 2 section 1. See what it shows. If identifies another 3 defendant -- consider." 4 Is that right? 5 <b>A. Yes.</b> 6 Q. And then at the bottom it says "[squiggle] two main 7 culprits -- deter others." Is that right? 8 <b>A. That's correct.</b> 9 Q. Can I just go back to the other defendant point? Didn't 10 you already have, though, evidence in relation to other 11 defendants, including the corner names and what was in 12 the Mulcaire notebook? 13 <b>A. Yes. All of that is indicative of our suspicions, and 14 the production order was, as well as gaining 15 information, further evidence in terms of Mulcaire and 16 Goodman, but in particular in respect of Mulcaire, it 17 was what was absent from the material. In other words, 18 he has a contract for something like 104,000 a year. 19 What's he getting -- why's he got that? Who's tasking 20 him? What are they tasking him with? And equally, 21 what's he giving back? Dependent on the outcome of 22 that, we would be able to do analysis in terms of, well, 23 assessing then, consider, actually, what is it that we 24 might be able to do in terms of building a further case?</b> 25 Q. Fair enough. Top of the next page it says "approach" --</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 does that say "victims"?</p> <p>2 <b>A. VIWs is sort of a police term for victims, witnesses.</b></p> <p>3 Q. Okay, fair enough.</p> <p>4 <b>A. It's a general term for --</b></p> <p>5 Q. "Inform -- no prejudice case -- more information</p> <p>6 later -- might approach later. Not go for restraint</p> <p>7 order -- has other assets which would mean doesn't</p> <p>8 matter what happens to ..."</p> <p>9 What's that figure?</p> <p>10 <b>A. That's "what happens to £25,000."</b></p> <p>11 <b>This was a discussion around Mulcaire has certainly</b></p> <p>12 <b>a fixed income of 100,000. Because I had instigated</b></p> <p>13 <b>a profile of a financial investigation on him, for</b></p> <p>14 <b>instance, we knew he owned a house. This discussion was</b></p> <p>15 <b>around if he has been earning this amount of money for</b></p> <p>16 <b>a duration of time, can we, in a prosecution, show that</b></p> <p>17 <b>this is the proceeds of crime, and therefore, in terms</b></p> <p>18 <b>of asset confiscation, for example, can we seize things</b></p> <p>19 <b>like his house?</b></p> <p>20 Q. I understand.</p> <p>21 <b>A. And actually, as it turned out, I understand that that's</b></p> <p>22 <b>why the only -- in court, on the advice of counsel, the</b></p> <p>23 <b>only amounts that we could definitively show were</b></p> <p>24 <b>proceeds of his criminality in respect of the charges</b></p> <p>25 <b>was the payments from Goodman to Mulcaire, which comes</b></p> <p style="text-align: center;">Page 57</p>	<p>1 charge, the technical argument didn't arise; correct?</p> <p>2 <b>A. I've only -- I understand that.</b></p> <p>3 Q. In relation to the royals, the technical argument didn't</p> <p>4 arise because you had the proof of unlawful interception</p> <p>5 before the true recipient read the message; is that</p> <p>6 correct?</p> <p>7 <b>A. Sorry, what do you mean by "technical argument"?</b></p> <p>8 <b>Because I've understood it --</b></p> <p>9 Q. The technical argument is the argument that you had to</p> <p>10 prove that --</p> <p>11 LORD JUSTICE LEVESON: The envelope had been opened.</p> <p>12 <b>A. It did arise with the royals, because that was the</b></p> <p>13 <b>evidence we had.</b></p> <p>14 MR JAY: The evidence you had was that the unlawful</p> <p>15 interception had taken place before the intended</p> <p>16 recipient ever listened to the message.</p> <p>17 <b>A. Yes. That's --</b></p> <p>18 Q. So it didn't arise because you could get over it by your</p> <p>19 technical evidence, your expert evidence. Is that</p> <p>20 right?</p> <p>21 <b>A. Yes. The technical evidence proved that in the case --</b></p> <p>22 <b>it was only Jamie Lowther-Pinkerton. I'm probably</b></p> <p>23 <b>misunderstanding what you're saying. I apologise.</b></p> <p>24 Q. But in relation to other possible victims, this</p> <p>25 technical legal argument might arise, but it wasn't</p> <p style="text-align: center;">Page 59</p>
<p>1 <b>to the £12,300, but we --</b></p> <p>2 Q. We'll come back to that, Mr Williams.</p> <p>3 <b>A. Okay.</b></p> <p>4 Q. The advice given by Mr Perry, level with the upper hole</p> <p>5 punch:</p> <p>6 "Challenges. Technical argument on interception.</p> <p>7 Therefore discussed interception against computer</p> <p>8 misuse. Therefore prefer interception as simpler for</p> <p>9 jury."</p> <p>10 So Mr Perry is obviously not advising that the</p> <p>11 technical argument on interception is doomed to failure,</p> <p>12 is he?</p> <p>13 <b>A. Correct.</b></p> <p>14 Q. Was it his advice that it was an open question what the</p> <p>15 true answer might be, but the case was certainly good</p> <p>16 enough to put to a jury?</p> <p>17 <b>A. Yes. It was a good enough case to put before a jury</b></p> <p>18 <b>because we had absolute proof of the interception in the</b></p> <p>19 <b>terms that we understood it to be able to present the</b></p> <p>20 <b>case. It was then we knew that we possibly, because we</b></p> <p>21 <b>were still having to look into what the data showed,</b></p> <p>22 <b>depending on our other range of victims that we wanted</b></p> <p>23 <b>to add, we'd be relying on what that data showed, but we</b></p> <p>24 <b>realised it may or may not show the full offence.</b></p> <p>25 Q. The position was this: in relation to the conspiracy</p> <p style="text-align: center;">Page 58</p>	<p>1 insurmountable because there was a good enough case on</p> <p>2 the law to put to the jury in any event; is that right?</p> <p>3 LORD JUSTICE LEVESON: Or to the judge.</p> <p>4 MR JAY: It would be the judge, sir.</p> <p>5 <b>A. By the technical -- I'm referring to all the technical</b></p> <p>6 <b>data that we would need to put --</b></p> <p>7 LORD JUSTICE LEVESON: No, Mr Jay is referring to the legal</p> <p>8 technical argument, namely whether you actually have to</p> <p>9 demonstrate that a message has been unlistened to before</p> <p>10 you come within RIP A.</p> <p>11 <b>A. Right, okay.</b></p> <p>12 MR JAY: That's what Mr Parry's talking about. He's not</p> <p>13 talking about expert evidence. He's talking about the</p> <p>14 technical issue of law, isn't he?</p> <p>15 <b>A. He is, but I understand it that he was talking about in</b></p> <p>16 <b>the context of supported by our technical data. Right?</b></p> <p>17 Q. But if you had the technical data conclusively to prove</p> <p>18 that the interceptions have taken place before the</p> <p>19 intended recipient accessed the voicemails, there was no</p> <p>20 technical issue of law --</p> <p>21 <b>A. I understand, sorry, sorry.</b></p> <p>22 Q. -- because it had been sorted.</p> <p>23 <b>A. In terms of we had it in respect of Jamie</b></p> <p>24 <b>Lowther-Pinkerton. We didn't in respect of the others.</b></p> <p>25 <b>And at this stage that was still unknown, because we</b></p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 <b>hadn't necessarily got those potential victims and</b>  2 <b>didn't know what technical data was available.</b>  3 Q. Thank you. Can we move forward through your statement  4 now. We're going to come back to the issue of what the  5 evidence was. The strategy for notifying the victims is  6 tab 133, which is page 03616. We're back to file 3.  7 <b>A. Thank you.</b>  8 Q. This is your document. It's dated 24 August, after your  9 counsel conference. The third bullet point:  10 "They are described as potential victims in the  11 sense that Mulcaire has gathered a range of names ..."  12 To be clear, this is approximately 180 potential  13 victims, see the second bullet point.  14 <b>A. Mm-hm.</b>  15 Q. "... that are predominantly from the celebrity world ...  16 They do also include some 17 names that are either MPs  17 or people closely associated with them, eg wife, 19  18 members of the royal household or close associates, 4  19 potential police officers and 2 potential members of the  20 Army. Given his research role for the media there is  21 nothing unlawful about having these names or gathering  22 information on them dependent upon how he gathered that  23 information and whether he can lawfully hold it."  24 We've covered that issue, really. That, if I may  25 say so, is adopting perhaps an overly cautious approach,</p> <p style="text-align: center;">Page 61</p>	<p>1 "Timeframe -- up to 3 weeks, but variable due to  2 Operation Overt."  3 So what you are asking for there is that the mobile  4 phone companies are going to find out whether there's  5 information which establishes that voicemails were  6 accessed; is that right?  7 <b>A. That's correct.</b>  8 Q. And was that information forthcoming within that  9 timeframe or generally speaking within it?  10 <b>A. I believe generally speaking within that timeframe.</b>  11 <b>I know that that information did come back.</b>  12 Q. So that information could demonstrate whether Goodman,  13 Mulcaire or others within the News of the World were  14 accessing voicemails of your victims; is that right?  15 <b>A. Yes. I am asking the phone companies, "This is how it's</b>  16 <b>done, here are the numbers that we believe are the ones</b>  17 <b>that are doing it. If it's possible, because it does</b>  18 <b>depend on their systems, are you able to ascertain</b>  19 <b>whether or not any of your customers have had their</b>  20 <b>unique voicemail numbers or equivalents called in".</b>  21 Q. And in relation to your cohort of victims, whether it  22 was 180 or the 418, that information was forthcoming  23 from the mobile phone companies, wasn't it?  24 <b>A. Yes, I believe over the next few weeks, course of weeks,</b>  25 <b>that information came back, and some of that did in fact</b></p> <p style="text-align: center;">Page 63</p>
<p>1 since we know what Mr Mulcaire's trade craft was, and we  2 do have similar fact evidence, don't we, a consistent  3 pattern here of behaviour from him. That's made clear  4 by the fifth point, actually:  5 "Given our belief that he carries out research on  6 these individuals in order to sell information to the  7 media, it is not at all clear with many of these victims  8 to what degree this research has been carried out and  9 whether or not it has actually resulted in access to  10 their voicemail -- albeit in a large number of cases he  11 appears to have what may be their UVNs and PINs."  12 So we have a consistent pattern. Of course there's  13 a different point as to whether he's actually accessed  14 the voicemail, but everything he's doing is with that  15 objective, isn't it?  16 <b>A. Yes.</b>  17 Q. The way forward:  18 "There's a need to establish definitively how many  19 victims there are, how many people have had their  20 voicemails rung by Mulcaire/Goodman. With that in mind,  21 all five of the UK mobile phone companies have been  22 asked to search their UVN equivalents for any of our  23 suspect phone numbers calling them going as far back as  24 possible -- up to one year."  25 Then you say:</p> <p style="text-align: center;">Page 62</p>	<p>1 <b>relate to the people in that list.</b>  2 Q. So coupled with that information, call it the call data.  3 <b>A. Yes.</b>  4 Q. And the corner names on the Mulcaire notebook, you were  5 beginning to build up a clear picture, weren't you, of  6 accessing of voicemails by others in the News of the  7 World?  8 <b>A. No, the call data was Glenn Mulcaire and Goodman</b>  9 <b>accessing those unique voicemail numbers, so it was in</b>  10 <b>respect of them. There was also, within News of the</b>  11 <b>World, there is a hub number.</b>  12 Q. Mm-hm.  13 <b>A. And we had information that the hub number was calling</b>  14 <b>some of these unique voicemail numbers, which was why in</b>  15 <b>the production orders we wanted two things. For</b>  16 <b>instance, one of our -- some of our questions were: did</b>  17 <b>Mulcaire have access to News of the World? So, in other</b>  18 <b>words, was it him? Did he have a desk? Was he doing it</b>  19 <b>in there? Was it Clive Goodman? And one of our</b>  20 <b>requests for information was -- because they have to</b>  21 <b>provide it, if they have it -- is: what is the phone</b>  22 <b>data behind that hub number? And what telephones did</b>  23 <b>they have related to those numbers and where were those</b>  24 <b>telephone numbers? So we could carry out an assessment</b>  25 <b>to see whether or not there was anyone else calling</b></p> <p style="text-align: center;">Page 64</p>



<p>1 <b>those unique voicemail numbers.</b></p> <p>2 Q. The call data that was coming in from the phone</p> <p>3 companies covered this hub number within the News of the</p> <p>4 World. That's right, isn't it?</p> <p>5 <b>A. I believe it did, yes.</b></p> <p>6 Q. And it's a number which ended 5354, I think. Does that</p> <p>7 ring a bell?</p> <p>8 <b>A. I'm afraid I won't remember any of the end numbers.</b></p> <p>9 <b>I would have to have a look at the document. There is</b></p> <p>10 <b>a number which is -- I believe it looks like a landline</b></p> <p>11 <b>number. It is -- it's like the Scotland Yard 2301212.</b></p> <p>12 <b>That would be their number.</b></p> <p>13 Q. We'll come back to that point in a moment, but it might</p> <p>14 be quite an important point.</p> <p>15 To go back to your document at tab 133, the next</p> <p>16 page, three lines down you say:</p> <p>17 "There is arguably a duty to inform people when they</p> <p>18 have been a victim of crime and in this case I believe</p> <p>19 that duty should be undertaken for those people who we</p> <p>20 know are victims. I refer to the fact that our suspects</p> <p>21 call their voicemails. That list will be identified as</p> <p>22 above and the next step is to decide when and how they</p> <p>23 should be informed."</p> <p>24 Can I just be clear how you're defining victims</p> <p>25 there. Are you defining victims as limited to those who</p> <p style="text-align: center;">Page 65</p>	<p>1 <b>compromised in terms of voice interception, but I don't</b></p> <p>2 <b>know whether all of them have been, or indeed whether</b></p> <p>3 <b>that was intended.</b></p> <p>4 Q. I think we might be slightly more precise, Mr Williams.</p> <p>5 The 418 --</p> <p>6 <b>A. Yes?</b></p> <p>7 Q. -- is those who were potentially compromised.</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. In other words, Mr Mulcaire was interested in them.</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. In some cases, he had the wherewithal to access the</p> <p>12 voicemails?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. In other cases he was merely getting the wherewithal by</p> <p>15 getting the PIN numbers or voicemail numbers.</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Amidst those 418, some of them were accessed but not all</p> <p>18 418. Is that right?</p> <p>19 <b>A. Yes, I see what you're saying.</b></p> <p>20 Q. I think the question in relation to tab 133 is why not</p> <p>21 notify all 418?</p> <p>22 <b>A. But I believe the implementation of this strategy was</b></p> <p>23 <b>all I'd got there is a snapshot in time from the</b></p> <p>24 <b>material that we happened to have received. There could</b></p> <p>25 <b>well be a wider pool of people that have been</b></p> <p style="text-align: center;">Page 67</p>
<p>1 you knew conclusively had had their voicemails accessed</p> <p>2 unlawfully or are you defining victims in the wider</p> <p>3 sense to include those who were or might have been part</p> <p>4 of the conspiracy and were therefore on the potentially</p> <p>5 compromised list, which were the 418 names at tab 94?</p> <p>6 <b>A. I believe it's as I wrote there. I believe that the</b></p> <p>7 <b>duty should be undertaken for those people we know are</b></p> <p>8 <b>victims by virtue of the fact that our suspects called</b></p> <p>9 <b>their unique voicemail numbers.</b></p> <p>10 Q. Why not broaden it to cover those who were potentially</p> <p>11 compromised, Mr Williams?</p> <p>12 <b>A. What do you mean by "potentially"? I'm taking that as</b></p> <p>13 <b>somebody has rung their unique voicemail number.</b></p> <p>14 Q. I'm sure that's not what tab 94 -- if tab 94 bears that</p> <p>15 meaning, then you had evidence in each of the 418 cases</p> <p>16 that the voicemails had been unlawfully accessed. The</p> <p>17 heading for tab 94 is "List of those potentially</p> <p>18 compromised". In other words, Mr Mulcaire had the</p> <p>19 wherewithal to access. Whether or not he did access</p> <p>20 you'd need further evidence to establish. That must be</p> <p>21 right, mustn't it?</p> <p>22 <b>A. This document I viewed is the pool of people that he was</b></p> <p>23 <b>interested in.</b></p> <p>24 Q. Yes.</p> <p>25 <b>A. And within them, yes, potentially some -- they were</b></p> <p style="text-align: center;">Page 66</p>	<p>1 <b>compromised as a result of his activity or indeed</b></p> <p>2 <b>anywhere else. So this strategy was aimed at the full</b></p> <p>3 <b>potential of what those potential victims might be. So</b></p> <p>4 <b>that's where it's actually in the when and the how that</b></p> <p>5 <b>I'm seeking or I was hoping through this strategy to</b></p> <p>6 <b>address that much wider pool of potential people, which</b></p> <p>7 <b>would have included everybody on that list.</b></p> <p>8 Q. What seems to have happened, if you look under the</p> <p>9 heading "Issues to bear in mind if informing victims":</p> <p>10 "Informing all of the victims [that, I think, must</p> <p>11 be a reference to 418] could be resource intensive which</p> <p>12 SO13 can ill afford."</p> <p>13 Have I correctly interpreted that as the 418?</p> <p>14 <b>A. Absolutely, that's my starting point, but acknowledging</b></p> <p>15 <b>there could be more.</b></p> <p>16 Q. There could be even more than 418?</p> <p>17 <b>A. Exactly.</b></p> <p>18 Q. That's keeping an open mind, I suppose. We know it's</p> <p>19 probably 829, at least as matters stand.</p> <p>20 "From all that is known, the risk to the victims</p> <p>21 does not extend to a risk to life or serious</p> <p>22 injury/damage to property, but rather the goal of the</p> <p>23 criminality is to seek material of media interest --</p> <p>24 typically salacious gossip!"</p> <p>25 That's a reason for limiting rather than broadening</p> <p style="text-align: center;">Page 68</p>

1 the notification of victims; is that correct?

2 **A. No, I'm just putting in context the risk. You asked me**

3 **much earlier, when I was considering how serious could**

4 **be this in terms of criminals, terrorism, national**

5 **security, this is where I've now refined this, that this**

6 **activity is primarily around -- or from everything I've**

7 **seen, it's targeted as getting this type of information.**

8 **So I'm just putting in context the risk of harm. I'm**

9 **not saying that it's not harmful.**

10 Q. Of course you're not, Mr Williams. We're not suggesting

11 that. You're not downplaying this in the sense that

12 you're saying it's harmful, but it's one of the issues

13 that you're bearing in mind if informing victims, isn't

14 it? It's the second point you raise.

15 **A. Yes.**

16 Q. And the third point:

17 "Arguably [again that's fair enough] any immediate

18 and future risk has been negated."

19 You've caught your main villains. The fourth point:

20 "Although the techniques for voicemail interception

21 may not be limited to these suspects, it's unlikely

22 these two will have shared them with a wider audience

23 given the potential earning value of the technique.

24 Equally, our investigation to date has not identified

25 any other suspects calling the UVNs of our main

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1 victims."

2 Well, Mr Mulcaire would no doubt seek to keep his

3 trade craft close to his metaphorical chest, as it were,

4 but this isn't an argument, is it, against a proposition

5 that others within the News of the World might have been

6 using the same technique?

7 **A. That's correct. I'm merely trying to balance out things**

8 **in terms of originally I speculated this could be**

9 **totally widespread across all media, but when I look at**

10 **this case and what I found, all I'm saying is all the**

11 **activity that I'm finding seems to be Glenn Mulcaire**

12 **doing it with Clive Goodman. Yes, there could be others**

13 **in certainly News of the World or any other media that**

14 **are aware of it. Equally, the phone companies have not**

15 **come back to me and said, "This is far more widespread".**

16 **I'm merely trying to articulate here the various things**

17 **that I was trying to balance. I've speculated that it**

18 **could be very wide. Actually, it might be more**

19 **constrained.**

20 LORD JUSTICE LEVESON: How would they know?

21 **A. The voicemail --the service --**

22 LORD JUSTICE LEVESON: How would the voicemail companies

23 know? Unless they knew the numbers that were dialling

24 in to other people's voicemails, how would they ever

25 know?

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1 **A. No, I agree, it is challenging.**

2 LORD JUSTICE LEVESON: I mean, the reason I ask is you just

3 said, "No, they weren't coming back saying this was

4 a big problem". Two questions: (a) how would they know?

5 (b) is this something that they would want to spread

6 about for commercial reasons, whereas you might have a

7 different view about that?

8 **A. No, no, I understand that. I am aware, though, that**

9 **they have special accounts for what they call VIPs and**

10 **I am aware that they were using this, they were telling**

11 **us, this knowledge that it had gained from us, to look**

12 **across their accounts to see whether they could see or**

13 **even detect this type of activity happening elsewhere.**

14 **Totally accept it was very challenging for them. Some**

15 **of the companies couldn't do it. Vodafone and O2 had**

16 **better a software system.**

17 LORD JUSTICE LEVESON: I just don't see how it works,

18 because they need a number to search against. If

19 12345678 is calling all your various targets, then they

20 can check up to see 12345678 as it were phoning lots of

21 different people. But if they're using different phone

22 numbers in different places then that could be just

23 people dialling into their own voicemails.

24 **A. It's an indicative thing. The way to do it would be --**

25 **take my mobile number. Normally, with most people's**

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1 **voicemail, you ring your own voicemail. It's rare to**

2 **use another phone. Therefore they could look at their**

3 **unique -- I don't know technically to what degree it's**

4 **possible, but this is me speculating. They could look**

5 **at the UVNs and say are there any numbers where there**

6 **are six, seven, eight, ten different numbers ringing**

7 **into that unique voicemail? That would be a way of**

8 **saying do we want to speak to that customer just to**

9 **check that it's the customer, or is there something**

10 **going on? Are there any patterns of behaviour that**

11 **would be indicative that this is happening elsewhere?**

12 **That would be one way of doing it, if their software**

13 **allowed them to do it.**

14 MR JAY: In terms of notifications is the options, item 2:

15 "Extend the victims to be informed to include anyone

16 who falls into the category of MP, royal household,

17 police and military on the basis that although there is

18 nothing to suspect personal safety or national security

19 is being targeted, these are people for whom those

20 aspects could be a collateral risk."

21 Are you saying there that out of your list of 418

22 you're going to identify those who fall within the four

23 categories and notify them yourselves?

24 **A. This is one of the options that it would be them,**

25 **initially it would be from that pool or if anyone**

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<p>1 <b>else -- if the phone companies come back to us with any</b></p> <p>2 <b>information, anyone else who falls into those</b></p> <p>3 <b>categories, then that was one of the options.</b></p> <p>4 Q. Given that it's the option we know that you pursued, all</p> <p>5 I wanted to do was to be clear that out of the 418,</p> <p>6 those who are classified as MPs, royal household,</p> <p>7 et cetera, would be notified; is that right?</p> <p>8 <b>A. If -- let me just read this. (Pause).</b></p> <p>9 <b>If we had something to show that their unique</b></p> <p>10 <b>voicemail number had been rung. There is an extra step,</b></p> <p>11 <b>if you read it, it is I actually selected option 4, and</b></p> <p>12 <b>option 4 is as per 3, in other words I think all victims</b></p> <p>13 <b>whose voicemails have been called, but we were -- but</b></p> <p>14 <b>the issue will be the when and the how, and in addition,</b></p> <p>15 <b>the four categories in option 2, in other words MP,</b></p> <p>16 <b>royal household, police and military, will be informed</b></p> <p>17 <b>now. And then we're still going -- this is</b></p> <p>18 <b>indicative -- we're still going through the process of</b></p> <p>19 <b>potentially identifying people that we're unaware of.</b></p> <p>20 Q. It may be my fault. That's not quite how I read it</p> <p>21 because I should have read the last sentence of option</p> <p>22 2:</p> <p>23 "The latter four categories would include those that</p> <p>24 are on Mulcaire's list whether or not any investigation</p> <p>25 shows that their UVN has been dialled."</p> <p style="text-align: center;">Page 73</p>	<p>1 a conspiracy to rob?</p> <p>2 <b>A. Yes, they -- I can see they would be a victim, yes.</b></p> <p>3 LORD JUSTICE LEVESON: Well, then why is it any different</p> <p>4 for those whose details are available to you on your</p> <p>5 list -- not saying when you do it or how you do it, but</p> <p>6 why is there any difference when it's abundantly clear</p> <p>7 that if Mr Mulcaire is collecting phone numbers and PIN</p> <p>8 numbers and all this detail, he's probably doing it for</p> <p>9 somebody else, therefore he is conspiring with them,</p> <p>10 probably, to use this information to access voicemails,</p> <p>11 because why would you want the PIN anyway, and you</p> <p>12 probably had to do some work to get it, and therefore</p> <p>13 they are, are they not, victims of a conspiracy to</p> <p>14 intercept their communications? I'm not criticising the</p> <p>15 timing, I'm not suggesting you had all the time in the</p> <p>16 world to do this, I understand the problems that SO13</p> <p>17 were facing, but just looking at it, doesn't that</p> <p>18 provide actually the appropriate approach?</p> <p>19 <b>A. I understand exactly what you're saying. In hindsight</b></p> <p>20 <b>now, I entirely agree. I see that. All I'm saying is</b></p> <p>21 <b>at the time my mindset was very much not -- I understand</b></p> <p>22 <b>the conspiracy, but my mindset, rightly or wrongly, was</b></p> <p>23 <b>very much that the voicemail -- to be a victim, the</b></p> <p>24 <b>voicemail was the unopened voicemail. In this, I'm</b></p> <p>25 <b>actually broadening it in here. I'm genuinely looking</b></p> <p style="text-align: center;">Page 75</p>
<p>1 So are you saying that in fact it was a variation of</p> <p>2 option 2, that it was option 2 together with proof that</p> <p>3 their UVNs had been dialled?</p> <p>4 <b>A. Right. I hope I see what you -- where you may have</b></p> <p>5 <b>misunderstood it. I've selected option 4.</b></p> <p>6 Q. Okay.</p> <p>7 <b>A. And what I'm saying is option 4 is as per 3, which is</b></p> <p>8 <b>actually option 3, in other words inform -- I'm saying</b></p> <p>9 <b>that the people who should be informed are all victims</b></p> <p>10 <b>whose voicemails have been called. Now, within option</b></p> <p>11 <b>4, the variation is the four categories, forget option</b></p> <p>12 <b>2, in other words MP, royal household, military and</b></p> <p>13 <b>police --</b></p> <p>14 Q. I get it now, Mr Williams. You needed proof that their</p> <p>15 UVNs had been accessed?</p> <p>16 <b>A. I was accepting it's not -- I had put aside the fact</b></p> <p>17 <b>whether it was a new or old message, but if the UVN had</b></p> <p>18 <b>been rung, that was indicative.</b></p> <p>19 LORD JUSTICE LEVESON: I can understand this is not an easy</p> <p>20 job, Mr Williams, and you have lots of other things to</p> <p>21 do, although whether you have to do this is a matter</p> <p>22 which we'll doubtless come to, but if you thought a bank</p> <p>23 was the potential target of a bank robbery, but you'd</p> <p>24 foiled it through your work so that the bank were never</p> <p>25 ever touched, would you call that bank a victim of</p> <p style="text-align: center;">Page 74</p>	<p>1 <b>for a way of how can I make this public? How can I --</b></p> <p>2 <b>number one, I'm making it public by a prosecution from</b></p> <p>3 <b>all the effort that we've put into prosecuting. I'm</b></p> <p>4 <b>genuinely trying to tell people that there was</b></p> <p>5 <b>a vulnerability.</b></p> <p>6 <b>I totally understand that now, when people look back</b></p> <p>7 <b>at this, that they think that more people should have</b></p> <p>8 <b>been informed and told, but at the time I can assure you</b></p> <p>9 <b>this was not me trying to limit the people I was --</b></p> <p>10 LORD JUSTICE LEVESON: I'm not criticising you with the</p> <p>11 benefit of hindsight, Mr Williams, I really am not. I'm</p> <p>12 simply trying to understand --</p> <p>13 <b>A. Yes.</b></p> <p>14 LORD JUSTICE LEVESON: -- your legitimate requirement, which</p> <p>15 you identified at the very, very beginning, that people</p> <p>16 should know about this weakness, and that you should</p> <p>17 stop the activity, and we'll come to the latter part</p> <p>18 later.</p> <p>19 <b>A. For me this was a moment in time where I documented what</b></p> <p>20 <b>had been happening, what I believed was happening and</b></p> <p>21 <b>what I intended to continue happening. The whole thrust</b></p> <p>22 <b>of this was to make absolutely clear and public what was</b></p> <p>23 <b>going on. And I understand that my thinking at the time</b></p> <p>24 <b>may well have limited, by a definition of the law that</b></p> <p>25 <b>I believed it to be, who would call what victims. I,</b></p> <p style="text-align: center;">Page 76</p>

19 (Pages 73 to 76)

<p>1 <b>because I was very mindful of the resources, I decided</b>  2 <b>that we within SO13 --</b>  3 MR JAY: But your definition of the law wasn't entering into  4 this, because option 2, we can see "whether or not their  5 UVN has been dialled". You weren't differentiating  6 between opened and unopened envelopes, were you?  7 <b>A. No, in a sense I -- there's producing a case in court</b>  8 <b>that I believe actually we will secure a criminal</b>  9 <b>conviction --</b>  10 Q. Yes but this isn't about proving cases, this is about  11 notifying people.  12 <b>A. I agree this isn't, which is why I've -- yes, in this</b>  13 <b>example, I've actually widened it. This is purely me</b>  14 <b>saying that we in SO13, we will do this bit. My</b>  15 <b>intention was, and I accept that that didn't happen as</b>  16 <b>I intended, that actually the phone companies would take</b>  17 <b>a more specific role in terms of all these other people,</b>  18 <b>but that was also coupled with the fact that we were</b>  19 <b>doing a very public trial, that I believed that there</b>  20 <b>would be public awareness of this, and indeed that was</b>  21 <b>coupled with the fact in terms of prevention that I knew</b>  22 <b>all the phone companies were changing all their systems</b>  23 <b>to prevent it.</b>  24 <b>I accept it didn't work out as I intended.</b>  25 Q. The judicial review was conceded by the Metropolitan</p> <p style="text-align: center;">Page 77</p>	<p>1 <b>A. Yes.</b>  2 Q. Why didn't you include Mr Goodman's safe and computer,  3 suitably redacted for journalistic material?  4 <b>A. I know we had -- I don't know what was in there.</b>  5 <b>I believe we did ask for a range of material that we</b>  6 <b>were seeking in the series of letters, and it would come</b>  7 <b>from whatever source they had it. I'm not aware that we</b>  8 <b>knew what was in the safe or was on his computer, so</b>  9 <b>therefore we're asking for this is the material wherever</b>  10 <b>it is.</b>  11 Q. But that material in the safe, the computer, may well  12 have gone wider than the categories we see in  13 paragraph 3, mightn't it?  14 <b>A. Yes, it may have. In my mind, I'm imagining like my</b>  15 <b>computer on my desk, which is a network computer to</b>  16 <b>a main server, so we're actually, as I understood, in</b>  17 <b>the series of letters in terms of asking for anything,</b>  18 <b>but we list a series of things but we're quite open that</b>  19 <b>we're looking for anything that may --</b>  20 Q. The request was in subsequent letters. It's not in this  21 draft application?  22 <b>A. No.</b>  23 Q. The summary of the evidence, this is on the third page,  24 on the internal numbering 714. The reason why I refer  25 to this is because it's a neat encapsulation of what</p> <p style="text-align: center;">Page 79</p>
<p>1 Police on the basis that proper notification didn't  2 occur, and the phone companies, save for O2, I think,  3 did not notify their customers, regardless of your  4 intentions. That's right, isn't it?  5 <b>A. I accept that.</b>  6 Q. Can we move on, because we have to progress through this  7 and I'm afraid there's still a fair bit more, to the  8 issue of the production order, Mr Williams. That's  9 tab 138, which is 03626. That and Copelands' letter of  10 31 August, where they had seen a draft application under  11 section 1 of PACE, is this right, and they provided you  12 with certain information, which in fact we don't have in  13 this bundle. Do you see that? It's items 1 to 4.  14 <b>A. Yes.</b>  15 Q. In fact, we do have some of it but not all of it. But  16 it's the PACE application which is more interesting,  17 tab 139, which is 06328. This is the application which  18 existed in draft and which was never pursued; is that  19 correct?  20 <b>A. Yes, I believe it is.</b>  21 Q. What you were seeking, prospectively, in paragraph 3 was  22 "All paid cheques, credit/debit slips, mandates"  23 et cetera, which was really the financial audit trail  24 between News Group and Glenn Mulcaire; have I correctly  25 understood it?</p> <p style="text-align: center;">Page 78</p>	<p>1 material you had available to you. You see paragraph 11  2 towards the bottom of the page:  3 "The evidence in this case may be summarised as  4 follows: telephone records show that calls to the  5 retrieval numbers were regularly made from Goodman's  6 home address, Mulcaire's business address and the [that  7 should say offices] of News International."  8 This is the hub number we're talking about, isn't  9 it?  10 <b>A. Yes.</b>  11 Q. So given that it's the hub number of News International,  12 logically it could include other journalists, couldn't  13 it?  14 <b>A. Yes.</b>  15 Q. Item 2 on the next page:  16 "The length of these calls demonstrates that on many  17 occasions the caller must have entered the correct PIN  18 and accessed the voicemail messages."  19 Because if you get beyond a certain number of  20 seconds, you draw the inference that the voicemail is  21 being listened to rather than there being nothing on the  22 voicemail. That's right, isn't it?  23 <b>A. Correct.</b>  24 Q. "technical analysis has shown that on a significant  25 number of occasions the voicemail messages were</p> <p style="text-align: center;">Page 80</p>

<p>1 intercepted before they were retrieved."</p> <p>2 Then you refer to financial information at</p> <p>3 paragraph 14. This is the yearly retainer. This is</p> <p>4 adding up to £104,000.</p> <p>5 Item 16, this is other payments, typically of £250,</p> <p>6 linked to specific stories. We heard evidence in</p> <p>7 relation to that from Lord Prescott, and indeed Lord</p> <p>8 Prescott, then Deputy Prime Minister, is at the top of</p> <p>9 the next page. You see his name, it's one of the names</p> <p>10 which isn't redacted.</p> <p>11 Do you accept that there is validity in the point</p> <p>12 that this evidence justified further investigation,</p> <p>13 including calling people in for interview, in particular</p> <p>14 those who were identified in the corner names?</p> <p>15 <b>A. Yes, I accept that there was absolutely further leads</b></p> <p>16 <b>that we could have followed in this investigation.</b></p> <p>17 Q. We'll come to why you didn't follow them in a moment.</p> <p>18 The 12,300 point, that comes from paragraph 21 --</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. -- in this document. It's the figure which formed the</p> <p>21 basis of the prosecution's case on 26 January 2007.</p> <p>22 I move forward to tab 141, which is 03639. This is</p> <p>23 Mr Maberly to Burton Copeland. You see the fourth</p> <p>24 bullet point, the request for information:</p> <p>25 "Who does Mr Mulcaire work for? Has he completed</p> <p style="text-align: center;">Page 81</p>	<p>1 Have I correctly understood it?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. In your view, did you have sufficient information to put</p> <p>4 before the magistrate that News International were not</p> <p>5 co-operating with you?</p> <p>6 <b>A. At this juncture, we had -- once we knew what the</b></p> <p>7 <b>replies were, we had -- if we -- we reached a stage here</b></p> <p>8 <b>where if we're going to go further, as we speculated,</b></p> <p>9 <b>there are leads here, there are potential -- with the</b></p> <p>10 <b>names in the corner. This is a step change from our</b></p> <p>11 <b>original investigation. And this is a much broader,</b></p> <p>12 <b>wider investigation. What I would have wanted to do is</b></p> <p>13 <b>to go through all of that material, analyse it</b></p> <p>14 <b>thoroughly, see exactly what it did produce. Depending</b></p> <p>15 <b>on the outcome of that, then we would look at and</b></p> <p>16 <b>compare that to what we've just had in terms of reply,</b></p> <p>17 <b>and actually there would be a number of options, because</b></p> <p>18 <b>I might not be doing that. I might actually be</b></p> <p>19 <b>interviewing and arresting people. But that is</b></p> <p>20 <b>a significant step change, and that is actually we've</b></p> <p>21 <b>reached -- although there had been a continuing theme,</b></p> <p>22 <b>this is: is this a much wider, bigger investigation?</b></p> <p>23 Q. If you were going to make it part of a wider, bigger</p> <p>24 investigation, you would then move to the step of</p> <p>25 thinking: News International have not co-operated, we</p> <p style="text-align: center;">Page 83</p>
<p>1 work for other editors/journalists at News of the World?</p> <p>2 Can we have a copy of any other records of work</p> <p>3 completed by Mulcaire for these editors and</p> <p>4 journalists?"</p> <p>5 So, putting it as austerely as I can, certainly it</p> <p>6 was within contemplation that others at News of the</p> <p>7 World might have been within the ambit of Mr Mulcaire's</p> <p>8 unlawful activities; is that right?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. And there's reference, isn't there, to "any fellow</p> <p>11 co-conspirators" towards the end of this letter:</p> <p>12 "The investigation is attempting to identify all</p> <p>13 persons that may be involved including any fellow</p> <p>14 co-conspirators."</p> <p>15 I'm right in saying that all that you got from</p> <p>16 solicitors acting for News of the World was extremely</p> <p>17 limited, wasn't it, evidentially?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. We also had what happened on 8 August, that News of the</p> <p>20 World were obstructive, in your eyes, weren't they?</p> <p>21 <b>A. Yes, yes.</b></p> <p>22 Q. In order to get a warrant under section 1 of PACE in</p> <p>23 relation to journalistic material, you would have to</p> <p>24 demonstrate, to paraphrase, that the target of the</p> <p>25 proposed order was not co-operating with the police.</p> <p style="text-align: center;">Page 82</p>	<p>1 should go to the court to get an order to force this</p> <p>2 information out of them. Is that right?</p> <p>3 <b>A. That is one option. It depends on what I discovered in</b></p> <p>4 <b>a more thorough analysis of all this information, which</b></p> <p>5 <b>would include a lot of painstaking research around all</b></p> <p>6 <b>the phone numbers, all the work that we would have to do</b></p> <p>7 <b>around that in terms of identifying who do these numbers</b></p> <p>8 <b>belong to. All of that requires, maybe you're aware,</b></p> <p>9 <b>the individual's RIPA authorisations. It's</b></p> <p>10 <b>a significant amount of work.</b></p> <p>11 Q. Yes.</p> <p>12 <b>A. Not saying that it's not worth doing, but it is a major</b></p> <p>13 <b>step change in how we would take that investigation</b></p> <p>14 <b>forward.</b></p> <p>15 Q. I think it was about this point that the decision was</p> <p>16 made not to expand the investigation and not, in other</p> <p>17 words, to perform this step change; is that right?</p> <p>18 <b>A. It was consistent with the decisions where I'd raised it</b></p> <p>19 <b>earlier on in my decision logs.</b></p> <p>20 Q. Yes.</p> <p>21 <b>A. At this stage, now that we've had this response, are we</b></p> <p>22 <b>going to go any further in terms of this investigation?</b></p> <p>23 Q. And the answer from the boss was, "No, we're not"; is</p> <p>24 that right?</p> <p>25 <b>A. No, and I understood absolutely the reasons why we</b></p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

1 weren't.

2 Q. Can we be clear, because it's not altogether clear from

3 paragraph 43 of your statement, approximately when it

4 was that DAC Clarke decided not to expand the

5 investigation?

6 A. Sorry, which paragraph?

7 Q. 43.

8 A. I think at this final stage it would have been around

9 September, possibly October. But this is because

10 through those months we're getting these replies back,

11 we're not getting any information, and actually --

12 Q. I've only asked you to identify the point in time.

13 I think, Mr Williams, you're repeating a point which

14 you've already made, that News International weren't

15 co-operating, but DAC Clarke makes his decision

16 September, possibly October 2006.

17 A. Yes.

18 Q. And presumably you briefed him as to what the current

19 state of the evidence was; is that right?

20 A. Yes.

21 Q. Did you also explain to him that in your opinion

22 News International, through their solicitors, were not

23 co-operating with you?

24 A. Yes. My senior management were aware of that.

25 Q. And did you explain to him that you had good grounds to

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1 suspect, but I'll let you formulate it in your own

2 choice of words, that if you did expand the

3 investigation, others would be brought within the net?

4 A. All along, I -- we had some grounds to suspect that this

5 could be wider and that indeed if we undertook further

6 research we may find something. What I didn't know and

7 what I was clear about is what we would find, and

8 actually what it would amount to. What I was very

9 cognisant of, as indeed we all were, was the amount of

10 work it had taken to get us to where we were,

11 particularly in terms of the technical difficulties.

12 The other dimension that we were very conscious of

13 is we had achieved that in a covert operation, where

14 nobody knew what we were doing, nobody understood what

15 we were looking for, and they couldn't hide evidence.

16 At the moment, this was now very clear about what we

17 were doing and what evidence we were looking for, and it

18 is not unreasonable to think that it would be a far more

19 challenging operation in terms of the implication of the

20 resources that you would need.

21 Q. I understand. Is there a decision log which sets out

22 advice to DAC Clarke in effect not to expand the

23 investigation? Because if there is, I haven't seen one.

24 A. No, I haven't written anything.

25 LORD JUSTICE LEVESON: I'd just like you to answer

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1 a question which Mr Jay asked a couple of minutes ago,

2 and I think probably the answer is yes. But I'd like to

3 ask you. His question was:

4 "In your view, did you have sufficient information

5 to put before a magistrate that News International were

6 not co-operating with you?"

7 A. My -- no. I don't know. I don't know.

8 MR JAY: Did you ask the CPS?

9 A. Sorry?

10 Q. Did you ask the CPS?

11 A. No.

12 Q. Okay.

13 LORD JUSTICE LEVESON: Well, you've said they weren't

14 co-operating with you.

15 A. They were -- we are getting the replies from working

16 with the solicitors that they have appointed. I have no

17 reason to question the solicitors or to think that they

18 are doing anything wrong. We're being told that they

19 haven't got this information. I'm then at that point

20 considering where can we go next? Actually, it -- I was

21 not thinking -- it's not thinking about going for

22 a production order. What I would have wanted to do is

23 to go into all of that material, to explore that

24 material to see what was there.

25 MR JAY: I thought you'd already explored it. This is

Page 87

1 tab 94, isn't it? You'd already been through the

2 Mulcaire material, hadn't you?

3 A. We'd been through that material with a view to getting

4 potential names and assessing is there anything in terms

5 of national security in disclosure? We were well aware

6 that there were reasons why we -- further leads that we

7 could pursue: the names, the money. We'd attempted to

8 pursue them to a degree through the production order.

9 That has not produced it.

10 I knew that we would need to go through that

11 material again, and that we would have to do all the

12 research in exactly the same way we'd done around the

13 phone works to see what that showed. Then I would have

14 a better picture of is there actually something here

15 that I can either take to a judge in a production order

16 or, probably more realistically, I would have taken that

17 investigation forward, assuming that there is something

18 more in that material, in terms of arresting people.

19 Q. Your approach is painstakingly cautious, isn't it? You

20 had plenty of material to go to a magistrate and say,

21 "Look, these guys aren't giving us what we want, it's

22 not altogether surprising, because they didn't behave

23 themselves as they might on 8 August, there was

24 a stand-off, and look at the pathetic response to our

25 letters. Please may we have our order under section 1

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1 of PACE?" You could at least have had a word on that  
 2 one, couldn't you?  
 3 **A. I was thinking in the terms of to do this properly we**  
 4 **need to go through this material and therefore we would**  
 5 **need significant more resources and that's the issue**  
 6 **that we discussed.**  
 7 Q. Mr Clarke's decision not to broaden the investigation  
 8 isn't evidenced in any document, is it, to your  
 9 knowledge?  
 10 **A. Not to my knowledge, no.**  
 11 Q. So how is the decision communicated? Is there a meeting  
 12 which isn't minuted with Mr Clarke and he tells you  
 13 September, possibly early October, "Just keep this  
 14 investigation within its current bounds"?  
 15 **A. I can't remember that. I can't remember a specific day**  
 16 **or time. I just knew I was doing another job within**  
 17 **SO15. I knew that we'd constantly been briefing about**  
 18 **the scale and what we were finding and the consistent**  
 19 **decision, throughout this whole process, was that we**  
 20 **were not going to broaden it, and the rationale was**  
 21 **purely around the huge risk of other operations we're**  
 22 **dealing with and the significant resources that it would**  
 23 **need to take that investigation forward.**  
 24 Q. I understand. In paragraph 43 you say:  
 25 "I agree with his decision not to expand the  
 Page 89

1 investigation."  
 2 That suggests that there was a meeting at which  
 3 a decision was made. Are you saying that you didn't  
 4 attend that meeting?  
 5 **A. I don't know whether there was a specific meeting.**  
 6 **I know we were meeting him and the others all the time**  
 7 **in terms of briefing them. When I've written -- this is**  
 8 **me saying I entirely, as one of the SIOs there, was**  
 9 **absolutely cognisant of the huge threat that the UK was**  
 10 **under from terrorism.**  
 11 Q. Yes, we've heard about that, Mr Williams, but we reached  
 12 a point about ten minutes ago that if you were going to  
 13 broaden the investigation, it would require a step  
 14 change.  
 15 **A. Yes.**  
 16 Q. And so this was sort of a crunch moment, so someone  
 17 would have to say, "Either we're going to conduct this  
 18 step change or we're not", which suggests that there was  
 19 some sort of decision-making process in relation at  
 20 least to that. Do you agree?  
 21 **A. Yes I do, and Mr Clarke made it, but those step changes**  
 22 **had been steps throughout the investigation.**  
 23 Q. Yes.  
 24 **A. And this was -- here was more information. We have not**  
 25 **got anything further from this production order. Does**  
 Page 90

1 **that change anything? Because of the implications that**  
 2 **it would then mean if we wanted to take this further.**  
 3 Q. I'll just pick that up in a moment, but I would ask you  
 4 now please to look at the email at tab 147, 03655.  
 5 We're going to have to be very careful about this email,  
 6 because information is apparently relayed to  
 7 Rebekah Brooks by it says here "cops". The Inquiry is  
 8 absolutely not concerned to identify who that person  
 9 might be, and no questions are going to be asked of  
 10 anyone which might even lead to speculation about it.  
 11 All I'm concerned to do is ascertain whether the  
 12 information we see here is correct or not. That,  
 13 I think, you can fairly comment on.  
 14 The first point I'm sure is correct, the bang to  
 15 rights point.  
 16 The second point, the numerous voice recordings of  
 17 verbatim notes, tab 95 is the voice recordings of the  
 18 verbatim notes, that's the 11,000 pages of the notebook;  
 19 is that right?  
 20 **A. That's correct.**  
 21 Q. And the list of 100 to 110 victims, well, we've seen  
 22 different numbers floating around and we needn't perhaps  
 23 debate whether it's 180, 200 or the 100 which is  
 24 referred to in tab 131, I think it is, but we can debate  
 25 that.  
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1 Can I ask you though about payments record, the £1  
 2 million. Is that right or wrong?  
 3 **A. That's wrong.**  
 4 Q. And what should the figure be?  
 5 **A. I believe we know he had a contract for £105,000 and he**  
 6 **received some of those other payments that we've talked**  
 7 **about, but the figure of £1 million is not known to me**  
 8 **or my investigation team.**  
 9 Q. The contract had been going over a number of years, and  
 10 so it certainly added up. The cash payments were over  
 11 £200,000, weren't they?  
 12 **A. I don't know.**  
 13 Q. It's the evidence Mr Hughes gave, but it's -- item 4,  
 14 you probably agree with that, don't you, or tell me if  
 15 you don't. This is a pattern of victims being focused  
 16 on and then you move on to someone else.  
 17 **A. To be accurate, it's the telephone data that told us**  
 18 **that pattern, but it's correct in what it's showing.**  
 19 Q. Visiting the bigger victims where there are lots of  
 20 intercepts, is that right?  
 21 **A. That's correct.**  
 22 Q. The purpose of the visits were what? Why did you visit  
 23 the bigger victims?  
 24 **A. Because we wanted to ask them whether they would be**  
 25 **willing to be a potential victim in our prosecution.**  
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<p>1 Q. This is going to be one of these up to six people who 2 you'd identified in your conference on 21 August?</p> <p>3 <b>A. That's correct. It's not a member of the royal 4 household, it is someone else to show the breadth of 5 types of people that were being targeted.</b></p> <p>6 Q. "Their purpose is to ensure that when GM comes up in 7 court the full case against him is there for the court 8 to see (rather than just the present palace charges)." 9 Is that correct?</p> <p>10 <b>A. That's correct.</b></p> <p>11 Q. Item 7: 12 "All they are asking victims is 'Did you give anyone 13 else permission to access your voicemail?' and if not 14 'Do you wish to make a formal complaint?'" 15 Is that correct?</p> <p>16 <b>A. That's correct.</b></p> <p>17 Q. "They are confident that they will get, say, 5-10 people 18 who will give them the green light." 19 And you want people from different areas of public 20 life and of course one of the areas of public life was 21 journalists, wasn't it?</p> <p>22 <b>A. That's correct.</b></p> <p>23 Q. Although it's not listed here. And that is the reason 24 why Rebekah Brooks was being seen, wasn't it?</p> <p>25 <b>A. That's correct.</b></p> <p style="text-align: center;">Page 93</p>	<p>1 Q. Well, evidently the meeting must have been on or shortly 2 before 15 September.</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. I'm talking about Mr Clarke's decision not to widen the 5 investigation.</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. That must have come after this, mustn't it?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. "They have got hold of News of the World back numbers 10 and are trying to marry CG accesses to specific 11 stories." 12 Was that correct?</p> <p>13 <b>A. No, it's not correct.</b></p> <p>14 Q. "In one case they seem to have a phrase from a News of 15 the World story which is identical to the tape or note 16 of GM's access." 17 Is that correct?</p> <p>18 <b>A. I don't know whether that's correct and it was not part 19 of the investigative strategy.</b></p> <p>20 Q. Okay.</p> <p>21 <b>A. So we would not have been doing that.</b></p> <p>22 Q. "There are no recordings of News of the World people 23 speaking to GM or accessing voicemails." 24 Although there was, wasn't there, one recording of 25 GM giving instructions to an unknown person as to how to</p> <p style="text-align: center;">Page 95</p>
<p>1 Q. Because there's evidence available, which I can't refer 2 to at this stage but which I probably can at a later 3 stage, which makes that clear. Rebekah Wade, as she 4 then was, was one of the most accessed since 2005, twice 5 a week.</p> <p>6 <b>A. That's correct.</b></p> <p>7 Q. Item 9, which is obliterated by the photocopy: 8 "In terms of News of the World, they suggested they 9 were not widening the case ..." again, from the other 10 evidence I've seen, that should say "at this stage they 11 suggested they were not widening the case", "... to 12 include other News of the World people but would do so 13 if they got direct evidence, say News of the World 14 journos directly accessing the voicemails (this is what 15 did for Clive)." 16 Am I right in saying that this email must have been 17 sent before the decision was made by Mr Clarke not to 18 widen the investigation? It's 15 September.</p> <p>19 <b>A. Yes, it may well have been, yes, yes, 15 September.</b></p> <p>20 Q. Because there came a point --</p> <p>21 <b>A. So the meeting would have happened before that, yes.</b></p> <p>22 Q. The meeting with Mr Clarke --</p> <p>23 <b>A. No, no, sorry.</b></p> <p>24 Q. -- must have been after this.</p> <p>25 <b>A. The meeting with Rebekah Wade.</b></p> <p style="text-align: center;">Page 94</p>	<p>1 access voicemails? That's right, isn't it?</p> <p>2 <b>A. That's right.</b></p> <p>3 Q. And then item e: 4 "They do have GM's phone records which show 5 sequences of contacts with News of the World before and 6 after accesses ... obviously they don't have the content 7 of the calls ... so this is at best circumstantial." 8 Can I just be clear what that was a reference to? 9 Is that a reference to him phoning the hub number?</p> <p>10 <b>A. I don't know what this is referring to. I do know that 11 part of our case subsequently was Glenn Mulcaire's 12 records showing a sequence of contacts with 13 Clive Goodman before and after.</b></p> <p>14 Q. But that's not being referred to here.</p> <p>15 <b>A. That's not what being referred to here.</b></p> <p>16 Q. Can you tell us what is being referred to here?</p> <p>17 <b>A. I don't know.</b></p> <p>18 Q. Because what it might be a reference to is, putting 19 aside Mr Goodman, there was evidence of Mulcaire phoning 20 the News of the World, whether it's the hub number or 21 individual journalists at the News of the World, before 22 and after he, Mr Mulcaire, is accessing someone else's 23 voicemail, and that's pretty good circumstantial 24 evidence that the person at the News of the World who 25 has been spoken to is the person who's instigated the</p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)



<p>1 accessing. Do you see that?</p> <p>2 <b>A. Yes, I do see that. I don't know what context this was</b></p> <p>3 <b>written in in terms of our investigation.</b></p> <p>4 Q. But this is all in the context of item 9, "In terms of</p> <p>5 News of the World", you can see that, and all in the</p> <p>6 context of a discussion whether there was evidence which</p> <p>7 went beyond Goodman and Mulcaire. Do you follow that?</p> <p>8 <b>A. Yes, absolutely.</b></p> <p>9 Q. So whatever this means is that there was circumstantial</p> <p>10 evidence of accessing by Mulcaire on behalf of someone</p> <p>11 at the News of the World other than Goodman. Would you</p> <p>12 agree with that?</p> <p>13 <b>A. Sorry, can you say that last --</b></p> <p>14 Q. There was circumstantial evidence of accessing by</p> <p>15 Mulcaire at the instigation of --</p> <p>16 <b>A. Yes, yes.</b></p> <p>17 Q. -- people at the News of the World other than Goodman.</p> <p>18 And that is borne out by the phone records or call data,</p> <p>19 would you accept?</p> <p>20 <b>A. Yes. It would need further exploring.</b></p> <p>21 Q. Well, you had, though, Mr Williams, several pieces of</p> <p>22 information, the different categories. You had the</p> <p>23 corner names on the Mulcaire notebook, you had the call</p> <p>24 data, you had all the material in the notebook itself</p> <p>25 and you had basic common sense, if I may say so. You</p> <p style="text-align: center;">Page 97</p>	<p>1 <b>A. So it was -- yes. And it would be the duration of the</b></p> <p>2 <b>calls, which would be longer than I think 10 seconds was</b></p> <p>3 <b>taken as the cut-off point.</b></p> <p>4 Q. Yes.</p> <p>5 <b>A. That in essence I believe was the technical evidence.</b></p> <p>6 <b>I don't believe any other evidence was used. In terms</b></p> <p>7 <b>of then, it was then the range of victim and the area of</b></p> <p>8 <b>public life that they represented.</b></p> <p>9 Q. To be clear, counts 16 to 20 were limited to Mulcaire,</p> <p>10 and they weren't part of the conspiracy case, they were</p> <p>11 part of the direct case under section 1 of RIPA, so no</p> <p>12 other News of the World journalist was involved as an</p> <p>13 accessory to Mulcaire. But in order to bring in other</p> <p>14 journalists as accessories to Mulcaire in those cases,</p> <p>15 counts 16 to 20, you had the corner names, didn't you?</p> <p>16 <b>A. Yes, we had the corner names, but they are individual</b></p> <p>17 <b>names of people. More work would have had to have been</b></p> <p>18 <b>done to show who they were.</b></p> <p>19 Q. Yes, but you only had a limited number of people at the</p> <p>20 News of the World. Did you not even ask News</p> <p>21 International to provide a list of employees and you</p> <p>22 begin to work out who the first names might be?</p> <p>23 <b>A. No, we didn't do that. As I said, if we were going to</b></p> <p>24 <b>do that, that is a major step change in our</b></p> <p>25 <b>investigation --</b></p> <p style="text-align: center;">Page 99</p>
<p>1 had more than a springboard for a case which warranted</p> <p>2 further investigation, and probably, I would suggest,</p> <p>3 the arrest for questioning of those who were the corner</p> <p>4 names in the specific cases. Would you agree with that?</p> <p>5 <b>A. I agree that absolutely there were more leads and things</b></p> <p>6 <b>that we could have followed up. What I would have</b></p> <p>7 <b>wanted to do is a more thorough investigation, exactly</b></p> <p>8 <b>as we'd done with Clive Goodman and Mulcaire, but again</b></p> <p>9 <b>that comes back to the decision was that we were not</b></p> <p>10 <b>going to do that.</b></p> <p>11 Q. Can I just understand, though, we know that you took</p> <p>12 what became counts 16 to 20 to the stage of prosecution,</p> <p>13 and indeed Mr Mulcaire pleaded guilty to those and those</p> <p>14 were the five other people outside the household,</p> <p>15 including Mr Hughes, Mr Clifford, Elle Macpherson,</p> <p>16 Sky Andrew and AN Other, whose name I've forgotten.</p> <p>17 What was the evidence in those cases? Can we just</p> <p>18 understand what it was?</p> <p>19 <b>A. It was frequency of calls, so a high volume of frequency</b></p> <p>20 <b>of calls to the unique voicemail number.</b></p> <p>21 Q. By whom?</p> <p>22 <b>A. By Glenn Mulcaire.</b></p> <p>23 Q. Yes?</p> <p>24 <b>A. The duration of those calls.</b></p> <p>25 Q. So you could prove he was accessing?</p> <p style="text-align: center;">Page 98</p>	<p>1 Q. It's not changing from first to fourth gear, it's just</p> <p>2 a little change from first to second. All you need to</p> <p>3 do is -- surely News of the World would have helped to</p> <p>4 this extent; they weren't helping otherwise, I suppose:</p> <p>5 Please provide us with a list of journalists, maybe even</p> <p>6 limited to particular desks, whether the news desk or</p> <p>7 wherever?</p> <p>8 <b>A. To put together a criminal investigation, I wouldn't</b></p> <p>9 <b>just use that one facet. There would be a whole range</b></p> <p>10 <b>of questions and things that I would want to get put</b></p> <p>11 <b>together to have a cogent case as to now why am</b></p> <p>12 <b>I speaking to this individual. Not simply the fact that</b></p> <p>13 <b>their name is -- I'm making this up -- Bill, because</b></p> <p>14 <b>that's on a corner name, and they happen to be Bill</b></p> <p>15 <b>someone employed in this paper. I would need more than</b></p> <p>16 <b>that.</b></p> <p>17 Q. But what about Neville then?</p> <p>18 <b>A. Yes. This is where I would want to investigate the rest</b></p> <p>19 <b>of the material. Because it's not just Neville or Bill,</b></p> <p>20 <b>it is, as we surmised in the beginning, to what extent</b></p> <p>21 <b>is this in this organisation --</b></p> <p>22 Q. Okay.</p> <p>23 <b>A. -- whether it is just that organisation, and I would</b></p> <p>24 <b>have wanted to have gone all through that material.</b></p> <p>25 <b>That is a proper and professional way of carrying out</b></p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 <b>a criminal investigation. It's not done piecemeal or</b>  2 <b>bit by bit. It's done exhaustively, in exactly the way</b>  3 <b>that actually it's being done subsequently.</b>  4 Q. And of course if you were proceeding against other  5 journalists or at least building the case against other  6 journalists, you could have done that on a sample basis.  7 You didn't have to look at every single transaction.  8 You could have selected your transaction and put the  9 case to court on the basis of sample interceptions,  10 couldn't you?  11 <b>A. That's -- in terms of victims, that's what we did.</b>  12 Q. Yes. And if you'd broadened the investigation to  13 include other journalists, you could have adopted that  14 self-same approach, couldn't you?  15 <b>A. We could have, but I would have wanted to have known in</b>  16 <b>what was the weight of material and the evidence within</b>  17 <b>that material, and who were those sample journalists,</b>  18 <b>and again, in the same way, if they belonged to</b>  19 <b>different organisations, I would have wanted to</b>  20 <b>represent the breadth of the criminality across</b>  21 <b>different media groups, if that's what that material</b>  22 <b>reveals.</b>  23 Q. A sensible starting point, and this is clear from the  24 document of 7 August which Mr Maberly sent to Burton  25 Copeland, was to keep this to the News of the World --</p> <p style="text-align: center;">Page 101</p>	<p>1 she wishes to take the investigation into  2 News International further.  3 <b>A. This is purely: you are a potential victim. Would you</b>  4 <b>like to join our prosecution?</b>  5 Q. September 2006, Rebekah Wade, as she then was, I think,  6 was editor of the Sun, she wasn't editor of the News of  7 the World, she wasn't yet chief executive of  8 News International.  9 Mr Williams, Mr Hughes gave evidence yesterday as to  10 what he was shown in October 2006. I think it was early  11 October 2006. He wasn't shown any of the other material  12 which related to his private numbers, his direct line at  13 the House of Commons. Do you know why that was?  14 <b>A. I don't.</b>  15 Q. Can you --  16 LORD JUSTICE LEVESON: Should he have been?  17 <b>A. I wouldn't have been surprised for someone who was</b>  18 <b>assisting us in a prosecution to be given an awareness</b>  19 <b>of what the material was.</b>  20 LORD JUSTICE LEVESON: Not least because it demonstrated the  21 extent to which his numbers had been identified and  22 might lead him to change all of them.  23 <b>A. Yes.</b>  24 MR JAY: And he wasn't of course shown the three different  25 corner names of senior journalists which related to him,</p> <p style="text-align: center;">Page 103</p>
<p>1 anyway, I've put the point to you -- and enquire of the  2 News of the World, "Just provide us with a list of the  3 names of your journalists" and just see what that  4 yielded. It might, for example, have demonstrated that  5 there were no first names which corresponded with first  6 names of the journalists on the list as proffered to  7 you. Do you accept that?  8 <b>A. I accept that.</b>  9 LORD JUSTICE LEVESON: The other thing to note about counts  10 16 to 20 is that you did not seek to prove that  11 Mr Mulcaire had opened the envelope.  12 <b>A. Yes, I understand that. That was a decision between</b>  13 <b>counsel and CPS as to what those final charges were</b>  14 <b>actually going to be.</b>  15 MR JAY: That's, I think, the point we were looking at on  16 the second page of counsel's note.  17 There's one last point on the email, point 10:  18 "They are going to contact RW today to see if she  19 wishes to take it further."  20 Again, from evidence I've seen and Lord Justice  21 Leveson has seen, this relates to a formal complaint  22 that RW might make in her capacity as victim. This is  23 item 19 on the third page of the document I gave you.  24 LORD JUSTICE LEVESON: Yes.  25 MR JAY: It's not the more sinister interpretation, whether</p> <p style="text-align: center;">Page 102</p>	<p>1 was he?  2 <b>A. So he said. I don't know what he was and wasn't shown.</b>  3 Q. He's not likely to have been shown those because that  4 would have been part and parcel of an enquiry which  5 embraced the three senior journalists, but you've told  6 us that that enquiry had ceased?  7 <b>A. I don't know what he was told when he had his statement</b>  8 <b>taken. I accept what he says.</b>  9 Q. Do you think that to interview others at the News of the  10 World, including possibly editors, would have been  11 a fishing expedition, as Mr Yates told Parliament?  12 <b>A. My opinion is that to do a proper and professional</b>  13 <b>investigation to interview anyone, it has to be done</b>  14 <b>from a position of knowledge, and that in many</b>  15 <b>investigations simply going and asking someone to give</b>  16 <b>an explanation quite often results in "no comment", in</b>  17 <b>exactly the same way in my early decision logs I could</b>  18 <b>have gone and seen Mr Goodman and it is highly unlikely</b>  19 <b>that we would have got very far in the investigation.</b>  20 Q. Are you saying that it was fear that such an arrest and  21 interview would yield a "no comment" response which  22 stopped you from doing it?  23 <b>A. All I'm saying is the proper way to conduct an</b>  24 <b>investigation is from a position of strength, and</b>  25 <b>therefore I would have wanted to know everything that</b></p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 <b>was available to me before I go and interview someone.</b></p> <p>2 <b>Because I want to avoid that weakness.</b></p> <p>3 Q. But if resources are a consideration here, and one can</p> <p>4 see why they might be, although I'm not suggesting that</p> <p>5 you take shortcuts, you could take a slightly more</p> <p>6 robust approach and say, look, we've got a body of</p> <p>7 information here, there's certainly a high level of</p> <p>8 suspicion, we'll bring them in and ask them to explain</p> <p>9 it. And after all, if they don't explain it and give us</p> <p>10 "no comment", that in itself might give rise to further</p> <p>11 suspicion, mightn't it?</p> <p>12 <b>A. I entirely accept that that might have been a different</b></p> <p>13 <b>approach. The fact is we didn't do it and we did it for</b></p> <p>14 <b>a very specific reason.</b></p> <p>15 Q. Were you at all frustrate by Mr Clarke's decision?</p> <p>16 <b>A. No, I wasn't frustrated.</b></p> <p>17 Q. Was there any sense here that you were taking on a large</p> <p>18 and powerful organisation, News International, and that</p> <p>19 there were dangers in doing so?</p> <p>20 <b>A. I think with any large organisation, yes, we were aware</b></p> <p>21 <b>of it in terms of a big organisation, which is why we</b></p> <p>22 <b>carried out such a thorough investigation, why we sought</b></p> <p>23 <b>so much advice from the CPS, in particular in terms of</b></p> <p>24 <b>when it came to our arrest phase, because we wanted to</b></p> <p>25 <b>be able to seize as much evidence as possible and do it</b></p> <p style="text-align: center;">Page 105</p>	<p>1 a furore, and then force you, by that process, to carry</p> <p>2 out an investigation which you didn't really want to do.</p> <p>3 Is that a fair observation or not?</p> <p>4 <b>A. It's not. I understand that's what's being said now,</b></p> <p>5 <b>but I can assure you that was absolutely not the</b></p> <p>6 <b>intention. I wanted to make this as public as possible,</b></p> <p>7 <b>and the most obvious way of doing that is through</b></p> <p>8 <b>a prosecution. If I hadn't have wanted to have done it,</b></p> <p>9 <b>I could have stopped this investigation much earlier,</b></p> <p>10 <b>but that was absolutely not my intention. It was to</b></p> <p>11 <b>secure a prosecution, to make this very public, and</b></p> <p>12 <b>actually in the wider and the long term, to make it</b></p> <p>13 <b>absolutely clear what the risks were and how to prevent</b></p> <p>14 <b>it.</b></p> <p>15 Q. But regardless of the rights and wrongs of the decision</p> <p>16 that was taken, why didn't you speak to those very high</p> <p>17 up at News International, whoever you chose to speak to,</p> <p>18 and give them a warning that your suspicions were that</p> <p>19 this was going on beyond Goodman and Mulcaire, and that</p> <p>20 they needed, as it were, to sort this out and clean up</p> <p>21 their act, at the very least? Why didn't you do that?</p> <p>22 <b>A. I didn't think to specifically do that. I -- if I think</b></p> <p>23 <b>of your question and look back, I feel we made it</b></p> <p>24 <b>abundantly clear what our understanding was and what our</b></p> <p>25 <b>suspicions were in terms of the requests that we made to</b></p> <p style="text-align: center;">Page 107</p>
<p>1 <b>in a proper and professional manner so that we could not</b></p> <p>2 <b>be criticised for the way we carried out our</b></p> <p>3 <b>investigation.</b></p> <p>4 Q. You've heard it being suggested that there was an overly</p> <p>5 close and an unhealthy relationship between elements in</p> <p>6 the police and News International. Do you think that</p> <p>7 that was a factor in stifling this investigation?</p> <p>8 <b>A. I don't think it was a factor at all.</b></p> <p>9 Q. Why not?</p> <p>10 <b>A. Because I have worked -- ultimately the decision was</b></p> <p>11 <b>Mr Clarke's and I have worked with him since 2004. He</b></p> <p>12 <b>is the most professional man that I've ever worked for,</b></p> <p>13 <b>and I have absolute confidence in his integrity. I</b></p> <p>14 <b>totally agreed with his decision-making. We were all</b></p> <p>15 <b>acutely aware of the very difficult decisions that</b></p> <p>16 <b>ultimately he would have to make and the rationale for</b></p> <p>17 <b>it, and I do agree with it. And no one in my team had</b></p> <p>18 <b>any contact with any of the newspapers, and I can assure</b></p> <p>19 <b>you at no time in that investigation was it ever an</b></p> <p>20 <b>issue, did we ever discuss it, did it ever influence the</b></p> <p>21 <b>direction that we went in with that investigation.</b></p> <p>22 Q. Some might say that part of the reason, at least, why</p> <p>23 the victims weren't notified in a proper way was that</p> <p>24 there was a fear that, were that to happen, this would</p> <p>25 enter the public domain more explosively, cause</p> <p style="text-align: center;">Page 106</p>	<p>1 <b>them. I'm sure they were well aware of what it was that</b></p> <p>2 <b>we suspected, and given that ultimately a member of</b></p> <p>3 <b>their senior management team resigned on the basis of</b></p> <p>4 <b>what we'd found, I would have expected any senior</b></p> <p>5 <b>management in an organisation to question why had that</b></p> <p>6 <b>happened and to understand exactly what had gone on.</b></p> <p>7 Q. When you heard News International making public</p> <p>8 statements to the effect that this was one rogue</p> <p>9 reporter, you must have been very angry, Mr Williams,</p> <p>10 because you knew full well that that was highly unlikely</p> <p>11 to be the case, weren't you?</p> <p>12 <b>A. I was just realistic in the sense of that is an</b></p> <p>13 <b>organisation, like many organisations, looking to</b></p> <p>14 <b>protect their reputation, but I was well aware that they</b></p> <p>15 <b>knew what we had found through the prosecution and what</b></p> <p>16 <b>our suspicions were.</b></p> <p>17 Q. But to go to them, even for a relatively short meeting,</p> <p>18 and really read the riot act, or however you might</p> <p>19 choose to do it, don't you think in retrospect that that</p> <p>20 would have been a good idea, because then the stables</p> <p>21 might have been cleaned out and the public statements</p> <p>22 which were uttered might not have been made? Do you see</p> <p>23 that?</p> <p>24 <b>A. I do see what you're saying, and ...</b></p> <p>25 Q. Okay.</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 <b>A. But I didn't do it.</b></p> <p>2 Q. Did the possibility of doing that ever pass through your</p> <p>3 mind?</p> <p>4 <b>A. No. But mainly because I believed we were making this</b></p> <p>5 <b>very clear as to what we'd found, through a public</b></p> <p>6 <b>prosecution.</b></p> <p>7 Q. And you were telling us that you were getting letters</p> <p>8 from Burton Copeland.</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. But those letters you didn't believe, though, did you?</p> <p>11 You thought that News International were not</p> <p>12 co-operating with you?</p> <p>13 <b>A. I had no evidence that it was untrue. That is a very --</b></p> <p>14 <b>I can speculate all I like. As an investigator,</b></p> <p>15 <b>a criminal investigator, I work on evidence, and I know</b></p> <p>16 <b>the lengths that I would have to go to to get that</b></p> <p>17 <b>evidence.</b></p> <p>18 MR JAY: I'm going to move on now just to deal briefly with</p> <p>19 what happened before the Select Committee, and then what</p> <p>20 happened in 2009 with Mr Yates. I'd like to think that</p> <p>21 I could keep that to half an hour after lunch and then</p> <p>22 certainly deal with Mr Surtees. Do you mind breaking at</p> <p>23 this point?</p> <p>24 LORD JUSTICE LEVESON: No, that's fine, but let me just ask</p> <p>25 you to focus back on your original idea, way was to take</p> <p style="text-align: center;">Page 109</p>	<p>1 <b>I'd already done that, had made it very clear, not just</b></p> <p>2 <b>to them, but to any other organisation that might be</b></p> <p>3 <b>engaged in this, that might want to consider are we also</b></p> <p>4 <b>doing this.</b></p> <p>5 <b>That was the whole purpose. It was to show people:</b></p> <p>6 <b>if you are doing this, whoever you are and wherever you</b></p> <p>7 <b>are, actually it is clearly criminally wrong, and you'll</b></p> <p>8 <b>go to prison, and if you're an organisation that knows</b></p> <p>9 <b>that you seek information and you should be thinking to</b></p> <p>10 <b>yourselves, "I wonder if we've got any</b></p> <p>11 <b>vulnerabilities? -- that's what we do as a learning</b></p> <p>12 <b>organisation in the police. I don't necessarily expect</b></p> <p>13 <b>someone to come and tell me that I should do that, and</b></p> <p>14 <b>actually, I may be wrong, but I'm not aware in -- either</b></p> <p>15 <b>I've not done it and I'm not aware of my fellow</b></p> <p>16 <b>investigators having actually gone and done this in</b></p> <p>17 <b>senior companies. I know in frauds, then, but that's</b></p> <p>18 <b>more in terms of vulnerabilities of a system as opposed</b></p> <p>19 <b>to actually something being wrong in the organisation.</b></p> <p>20 <b>That's usually demonstrated through the prosecution of</b></p> <p>21 <b>people.</b></p> <p>22 LORD JUSTICE LEVESON: Let me ask you whether you think that</p> <p>23 Mr Justice Gross had the full picture when he sentenced</p> <p>24 Goodman and Mulcaire without at least understanding the</p> <p>25 extent to which Mr Mulcaire was involved in collecting</p> <p style="text-align: center;">Page 111</p>
<p>1 all necessary steps to prevent abuse of the telephone</p> <p>2 system. Right back at the beginning, that's what you</p> <p>3 wanted to do.</p> <p>4 <b>A. Yes.</b></p> <p>5 LORD JUSTICE LEVESON: Now, that might involve two steps,</p> <p>6 mightn't it? One step would be to ensure that everybody</p> <p>7 who was or may have been a target was modified, and also</p> <p>8 to ensure that a reputable organisation had taken every</p> <p>9 single appropriate step to investigate itself how what</p> <p>10 had happened had come to happen.</p> <p>11 That doesn't necessarily involve you in a great deal</p> <p>12 of work. It could involve anybody telling people, it</p> <p>13 could involve comparatively short contact. But it may</p> <p>14 be that you got overtaken by other events, but don't you</p> <p>15 think that -- or do you think that to fulfil that</p> <p>16 original requirement really did require you to think</p> <p>17 back and to take these additional steps?</p> <p>18 <b>A. I did think that I had achieved my original requirement,</b></p> <p>19 <b>both in terms of making those that might be vulnerable</b></p> <p>20 <b>to this aware, by the changing in the measures and</b></p> <p>21 <b>through this very public prosecution. I do understand</b></p> <p>22 <b>the point of your asking me did I think to go and</b></p> <p>23 <b>actually speak to the senior executives in</b></p> <p>24 <b>News of the World. No, I didn't. But the reason is not</b></p> <p>25 <b>because I was avoiding anything. Actually, I thought</b></p> <p style="text-align: center;">Page 110</p>	<p>1 this sort of data, even if it hadn't yet revealed</p> <p>2 criminal offences, on an industrial basis?</p> <p>3 <b>A. It's not for me to present how the case was presented,</b></p> <p>4 <b>and it is actually the irony and the sadness for the</b></p> <p>5 <b>first time I dearly wish they had pleaded not guilty</b></p> <p>6 <b>because the prosecution case had been put together with</b></p> <p>7 <b>all of this material, all the material, a lot of it that</b></p> <p>8 <b>you're talking about, it would have been tested in court</b></p> <p>9 <b>and it would have been plain to see. That's actually</b></p> <p>10 <b>what we were preparing for. So I believe --</b></p> <p>11 LORD JUSTICE LEVESON: You see, when one talks about</p> <p>12 £12,300, it doesn't really start to give the flavour of</p> <p>13 what was going on, does it?</p> <p>14 <b>A. No, but we did present -- or counsel -- it's not my</b></p> <p>15 <b>responsibility to ultimately how that case is</b></p> <p>16 <b>presented --</b></p> <p>17 LORD JUSTICE LEVESON: I'm not trying to blame you.</p> <p>18 <b>A. No, I understand that.</b></p> <p>19 LORD JUSTICE LEVESON: I'm merely trying to look back on</p> <p>20 where we are and where we've got to and how we've got to</p> <p>21 where we are.</p> <p>22 <b>A. You're right, £12,000 sounds a paltry amount, but if you</b></p> <p>23 <b>remember in that case conference I was actually</b></p> <p>24 <b>exploring what I realised is a two-year sentence, he's</b></p> <p>25 <b>not going to get two years. At that stage, we didn't</b></p> <p style="text-align: center;">Page 112</p>

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1 even know if there would a be prison sentence, and I'm  
2 thinking how can we demonstrate that actually -- and  
3 make people think that this really is going to threaten  
4 them if they're doing this, and that's why with the  
5 restraint orders I was saying, "He's been paid all this  
6 money. If he's bought a house over a number of years,  
7 can we seize that as part of asset confiscation?" All  
8 these things were discussed, but legally, quite rightly,  
9 because we have to follow the law, I -- or the  
10 prosecution would have to show the direct link between  
11 that earning and the case we had, and the case we  
12 prosecuted could only show those monies.  
13 So, yes, we did think about it and the scale.  
14 LORD JUSTICE LEVESON: Well, very good. 2 o'clock. Thank  
15 you.  
16 (1.04 pm)  
17 (The luncheon adjournment)  
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25

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