

<p>1 Monday, 14 November 2011 2 (10.30 am) 3 Housekeeping 4 LORD JUSTICE LEVESON: Good morning. I have now moved into 5 the formal phase of part one of in Inquiry, but before 6 calling upon Mr Jay to open, I believe it would be 7 worthwhile to summarise what has happened to date and to 8 identify the direction in which I now intend that we 9 should travel; in other words, what should happen from 10 now. I also need to deal with some matters of 11 housekeeping. 12 From the very start, I made it clear -- and I now 13 repeat -- that I fully consider freedom of expression 14 and the freedom of the press to be fundamental to our 15 democracy, fundamental to our way of life. But that 16 freedom must be exercised with the rights of others in 17 mind. My first public utterance on 13 July of this year 18 included these words: 19 "The Inquiry must balance the desire for a robustly 20 free press with the rights of the individual, while, at 21 the same time, ensuring the critical relationships 22 between the press, Parliament, the government and the 23 police are maintained. The press provides an essential 24 check on all aspects of public life. That is why any 25 failure within the media affects all of us. At the</p> <p style="text-align: center;">Page 1</p>	<p>1 Second, I conducted three briefing sessions on 2 security of IT and phones, which was in private, but in 3 open session on the legal framework and on the 4 regulatory framework. Nobody has suggested that these 5 factual presentations were inaccurate, and they are on 6 the Inquiry website for anyone to read, if they wish. 7 Third, I held two days of seminars, which generated 8 a wide range of views, and I'm pleased to say also 9 considerable debate and constructive suggestion. Videos 10 of those seminars as well as transcripts and summaries 11 are also on the website. A number of questions posed 12 have been reduced into writing and I continue to invite 13 anyone who has factual material relevant to them to send 14 it in to the Inquiry and it will be considered. 15 I remain very keen to encourage journalists to speak up 16 if they feel that in any regard, organs of the press 17 have taken a wrong turn in relation to their approach to 18 ethical issues. 19 Finally, as identified at one of the directions 20 hearings, I visited a number of news rooms representing 21 broadsheet, tabloid, mid-market and regional papers. 22 I went to Southampton to the Southern Daily Echo, and 23 I have also visited Associated Newspapers, 24 Trinity Mirror and News International. None of this is 25 part of the evidence, but I'm doing what I can to</p> <p style="text-align: center;">Page 3</p>
<p>1 heart of this Inquiry, therefore, may be one simple 2 question: who guards the guardians?" 3 That theme and my fundamental beliefs have not 4 changed, but it is critical to bear in mind that this 5 part of the Inquiry requires me to take an overview of 6 the culture, practice and ethics of the press, including 7 specifically the relationship of the press with the 8 police and with politicians and the extent to which the 9 current policy and regulatory framework has failed. 10 Inevitably, the brush will have to be quite broad, for 11 it cannot descend into a detailed analysis that might 12 lead me to applaud one newspaper or criticise another, 13 applaud one editor or editorial team and criticise 14 another. 15 Part 2 will be concerned with specific unlawful or 16 improper conduct within News International, other 17 newspaper or media organisations or those responsible 18 for holding personal data, and is deliberately deferred 19 until after the conclusion of the police investigation 20 and any prosecution. 21 How has this task been approached? First, a large 22 number of those involved were either invited to provide 23 evidence or required to do so. We are still receiving 24 evidence and the result may well be that some material 25 be called out of turn.</p> <p style="text-align: center;">Page 2</p>	<p>1 address what are at least perceived to be the 2 shortcomings consequent upon my lack of experience of 3 the way in which different sections of the press work. 4 That brings me to the way in which the future must 5 be considered. In the margins of the seminars I made it 6 clear that there was absolutely no point in my making 7 any recommendation unless it works both for the press in 8 its dealings with those who might be the subject of 9 stories, and with the individuals involved. It must 10 work for the necessarily relationships between the press 11 and the police and the press and politicians, but most 12 of all, each aspect must work for the public. It must 13 have an ethical base to which all adhere. 14 I therefore encouraged editors and those in 15 responsible positions within the press to meet to 16 discuss these issues outside the hearings that I am 17 conducting and to bring forward ideas. These ideas must 18 reflect the fundamental freedoms to which I have 19 referred, but it must also recognise that guarding the 20 guardians is not an optional add-on. Neither is it good 21 enough if it does not take account of legitimate public 22 concern, not only about phone hacking but also other 23 unethical behaviour not justified by what is truly in 24 the public interest. 25 I still encourage the core participant media groups</p> <p style="text-align: center;">Page 4</p>

<p>1 and other groups that represent the media and media 2 interests, such as the National Union of Journalists, to 3 do that and to engage outside the industry with other 4 interested participants to see if a sensible way forward 5 can be devised. If it can, and it satisfies what 6 I perceive to be the requirement of appropriate 7 oversight, I'll be pleased to endorse it. 8 While this discussion is happening, I will press on 9 with the formal part of the Inquiry. Mr Jay will 10 shortly open this aspect of part one of the terms of 11 reference, followed by other core participants. 12 Mr Sherborne will speak after the others, although 13 I will ask Mr Jay if there is any other opening comment 14 to be made in the light of the other submissions that 15 I have received. I will then proceed to hear evidence, 16 starting with those who allege that they have been the 17 victims of illegal or unethical press intrusion, 18 including but going beyond phone hacking. 19 Let me say at this stage how grateful I am to all 20 those who responded to calls for evidence, whether 21 voluntarily following a request or under compulsion 22 pursuant to section 21 of the 2005 Act. Everyone has 23 put a real effort into the exercise, and in the light of 24 what has been said to me, I have no doubt that the same 25 spirit of co-operation will be forthcoming for each Page 5</p>	<p>1 could be the subject of criticism. It is critical to 2 place everything in context. 3 Let me now deal shortly with some of the mechanics 4 of the hearing. I hope that everyone knows that the 5 proceedings will be streamed live both into the marquee 6 in the quad of this building and also onto the Internet. 7 Transcripts will be posted on the Internet daily. That 8 has a number of consequences. 9 First -- and it will be obvious from the outset -- 10 there's no question of my assessors being present every 11 day or anything like every day. It simply isn't a good 12 use of their time. Evidence that they wish to hear will 13 always be available for them and the advantage of 14 looking at such evidence retrospectively is that they 15 can exercise judgment as to what they wish to read, what 16 they wish to hear and where it is sufficient for them 17 simply to have seen the statements. They have already 18 played a very important part: assisting the legal team, 19 using their expertise to suggest further lines of 20 Inquiry in relation to particular witnesses or counsel. 21 When present, assessors will sit during the hearing 22 alongside counsel, but absolutely no conclusion should 23 be drawn from the fact that one or more is present or 24 absent. 25 Similarly, as I made clear in my second ruling on Page 7</p>
<p>1 aspect of the Inquiry, both from witnesses generally and 2 core participants in particular. 3 I hope that no one will assume that I am being 4 partisan if I particularly thank those who allege they 5 have been the subject of press intrusion, many of whom 6 doubtless wish to put their experiences behind them 7 rather than incur further unwelcome publicity when they 8 give evidence about the impact of their experiences on 9 them; in other words, when they clothe the seriousness 10 of the allegation with some detail. 11 I ought to add this: concern has specifically been 12 expressed that those who speak out might be targeted 13 adversely by the press as a result. I have absolutely 14 no wish to stifle freedom of speech and expression, but 15 I anticipate that monitoring will take place of press 16 coverage over the months to come and if it appears that 17 those concerns are made out, without objective 18 justification, it might be appropriate to draw the 19 conclusion that these vital rights are being abused, 20 which itself would provide evidence of culture, practice 21 and ethics which would could be relevant to my ultimate 22 recommendations. 23 I also recognise that there is a great deal to 24 applaud in our present press and I certainly do not 25 intend to limit my consideration to activities which Page 6</p>	<p>1 core participant status, core participants should not 2 consider it necessary to attend, whether by counsel or 3 at all, if they do not feel their presence is necessary. 4 If they have questions to suggest and do not perceive 5 the likelihood that they will want to submit that they 6 should question the witness of the day, as I expect to 7 be the norm, they also can catch up visually or by 8 transcript. Absence will not be considered 9 a discourtesy. I am very conscious of the enormous cost 10 of those attending this Inquiry and I do not want to add 11 to it unnecessarily. 12 The next administrative matter to mention concerns 13 the twin location of the hearing, here in this room or 14 in the large marquee, which is separated into areas for 15 the press and others. Both are designated as hearing 16 rooms. The marquee is merely an extension of this room. 17 I therefore expect the same decorum to be shown in the 18 marquee as will be evident here. 19 To all, therefore, I give this direction: once 20 you've chosen to watch the proceedings from this room 21 and you are in, then absent unexpected emergency, you 22 will be expected to remain in until a natural break in 23 the proceedings. If you want to move in and out, 24 whether to telephone or for any other reason, then the 25 appropriate place to watch the proceedings from is the Page 8</p>

<p>1 marquee.</p> <p>2 Having said that, as I made clear during the</p> <p>3 directions hearings, at present I'm satisfied that the</p> <p>4 use of live text-based communications does not interfere</p> <p>5 with the proper conduct of this Inquiry, and I am happy</p> <p>6 to permit the use of unobtrusive hand-held virtually</p> <p>7 silent equipment for the purpose of simultaneously</p> <p>8 reporting proceedings to the outside world.</p> <p>9 Finally, I return to one further topic about which</p> <p>10 I have previously spoken. The Prime Minister asked that</p> <p>11 I report within 12 months and I would wish to do so</p> <p>12 before the end of September 2012. We could, of course,</p> <p>13 spend very much longer on these very wide-ranging terms</p> <p>14 of reference. It has to be remembered that even after</p> <p>15 the evidence is concluded, reporting from Inquiries can</p> <p>16 be delayed for good reason. I emphasise that this</p> <p>17 target remains at the forefront of my mind, and I repeat</p> <p>18 that this means that we shall be as efficient as</p> <p>19 possible, limiting the evidence that it is necessary to</p> <p>20 call to the minimum rather than the most expansive.</p> <p>21 In the main, we will sit seven days a fortnight,</p> <p>22 generally starting 10 am, allowing for breaks for the</p> <p>23 shorthand writers. But I am conscious of the</p> <p>24 considerable amount of work that has to go on behind the</p> <p>25 scenes and it may not always be possible to achieve</p> <p style="text-align: center;">Page 9</p>	<p>1 Although the individual or individuals who deleted</p> <p>2 Milly's voicemail messages back in 2002 might not have</p> <p>3 realised at the time what the consequences might be in</p> <p>4 terms of raising false hopes, public opinion was rightly</p> <p>5 sickened by the callousness and cynicism of the</p> <p>6 perpetrators.</p> <p>7 Within two days of these revelations, the</p> <p>8 Prime Minister announced to Parliament that an Inquiry</p> <p>9 would be set up. Seven days later came the announcement</p> <p>10 of your appointment, and here we are today, embarking on</p> <p>11 a key stage in the serious and important business of</p> <p>12 discharging what, on any view, are wide-ranging and</p> <p>13 challenging terms of reference.</p> <p>14 This Inquiry is unprecedentedly demanding in</p> <p>15 a number of obvious and significant respects. First,</p> <p>16 the breadth of the terms of reference: an Inquiry into</p> <p>17 the culture, practices and ethics of the press.</p> <p>18 I'll attempt to analyse those concepts in a few minutes'</p> <p>19 time, but it is obvious that these parameters could</p> <p>20 scarcely be broader or more open-textured.</p> <p>21 You are required to consider and, if necessary,</p> <p>22 address a broad spectrum of behaviours and practices,</p> <p>23 embracing no doubt the good at one end of the spectrum</p> <p>24 to the frankly criminal at the other end, with unethical</p> <p>25 practices somewhere in between.</p> <p style="text-align: center;">Page 11</p>
<p>1 this, although sometimes we might do better.</p> <p>2 For good order, I make it clear that we will not sit</p> <p>3 on a Friday, and I mention that we will not sit on</p> <p>4 7 December or for the early morning of 13 December, when</p> <p>5 I have been asked to give evidence before the Justice</p> <p>6 Select Committee, not in relation to this Inquiry but</p> <p>7 rather arising out of my duties as chairman of the</p> <p>8 Sentencing Council. I will try and make up lost time.</p> <p>9 Applications of law will generally be heard before</p> <p>10 the start of the day or after the end of the sitting</p> <p>11 day, and notice should be given so that appropriate</p> <p>12 preparation can be undertaken.</p> <p>13 With those opening remarks, I will now ask Mr Jay to</p> <p>14 open the Inquiry to me.</p> <p>15 Opening submissions by MR JAY</p> <p>16 MR JAY: As everyone knows and no doubt still remembers,</p> <p>17 this Inquiry was set up in July this year following an</p> <p>18 extraordinary series of revelations and events,</p> <p>19 culminating in the demise of an iconic print title and</p> <p>20 high profile resignations at the top of the Met police.</p> <p>21 The immediate trigger of the setting up of this</p> <p>22 Inquiry, the tipping point, was the revelation that</p> <p>23 Milly Dowler's voicemail was accessed and voicemails</p> <p>24 deleted, causing family and friends to cling to the hope</p> <p>25 that she might still be alive.</p> <p style="text-align: center;">Page 10</p>	<p>1 Phone hacking is safely located at the spectrum end</p> <p>2 of worst practice, since it is illegal and can never be</p> <p>3 justified in terms of the criminal law by a claim that</p> <p>4 the public interest is being served. To be clear, phone</p> <p>5 hacking is almost inevitably a gross breach of ethical</p> <p>6 standards as well, and as it happens, we are not aware</p> <p>7 of a single example of the recent phone hacking about</p> <p>8 which complaint has been made that can even start to be</p> <p>9 justified on public interest grounds.</p> <p>10 However, it should be made absolutely clear that the</p> <p>11 evidence before this Inquiry will not be limited to the</p> <p>12 issue of phone hacking. There are many other examples</p> <p>13 of unethical and/or illegal practices which we will</p> <p>14 investigate.</p> <p>15 Secondly, the scale of public expectations. It</p> <p>16 should not be forgotten that the Inquiry is established</p> <p>17 under statutory powers that exercises public functions</p> <p>18 and is paid for by the taxpayer. The public is</p> <p>19 therefore entitled to expect a return on its investment.</p> <p>20 These expectations are all entirely reasonable and we</p> <p>21 will endeavour to meet them all.</p> <p>22 However, we are working within extremely tight</p> <p>23 timescales and the subject matter is truly vast. We</p> <p>24 will cover the ground as thoroughly as we can, but this</p> <p>25 is not a situation where we can honestly say that no</p> <p style="text-align: center;">Page 12</p>

<p>1 stone will be left unturned, since if we were to adopt 2 that approach, we would still be here in three years' 3 time. 4 Thirdly -- and I'm now returning to the terms of 5 reference -- the cart has been placed very much before 6 the horse. By that, I mean that in an ideal world, 7 which is certainly not the planet we inhabit, part two 8 of the Inquiry should really be taking place before part 9 one. The typical sequencing of public enquiries is that 10 the detailed forensic examination of the underlying 11 evidence takes place before consideration is given to 12 the bigger picture and the search for themes, patterns, 13 broken systems and cultures, but the existence of the 14 ongoing police investigation and the possibility of 15 criminal prosecutions means that a detailed forensic 16 examination cannot take place on a concurrent basis 17 without bearing in mind the public interest in the 18 proper conduct of the police's work. 19 There are two points here that I would wish to 20 emphasise, first so that the public fully understands 21 the practicalities in the light of the legal position. 22 This Inquiry cannot compel witnesses to answer questions 23 which might incriminate themselves. It is public 24 knowledge that the police have arrested at least 13 25 individuals who are therefore suspects in their</p> <p style="text-align: center;">Page 13</p>	<p>1 theme as this Inquiry progresses. In one sense, the 2 term may be question-begging, but it is useful 3 nonetheless. Furthermore, there are many aspects of 4 culture, practices and ethics which fall well outside 5 the police investigation and where the Inquiry's focus 6 can be as detailed or as general as it chooses. 7 I'm still explaining why this Inquiry is 8 unprecedentedly demanding and I'm coming on to my fourth 9 point, and it's a fairly obvious one. We are 10 investigating the press root and branch, and we will 11 therefore be investigating an extraordinarily powerful 12 and articulate range of institutions which have 13 considerable control over the way in which these 14 proceedings are reported, commented on and analysed. 15 This power of the press may be one reason why 16 politicians, at least arguably, have not been overly 17 keen to take steps to call it into question, through 18 fear that by doing so the press would withdraw support 19 for those politicians or subject them to close personal 20 scrutiny. If that analysis is right -- and I was 21 careful to say "may" -- it might also be said that this 22 Inquiry should have the self-same concerns, and 23 conversely, the public may fear that this Inquiry might 24 pull its punches for the self-same reasons. 25 I am, however, able to nip any such concerns in the</p> <p style="text-align: center;">Page 15</p>
<p>1 investigation, and it is possible that they will arrest 2 more. 3 The law affords these individuals considerable 4 protections in line with their constitutional rights. 5 To repeat, individuals cannot be compelled to answer 6 questions within the scope of the privilege against 7 self-incrimination and adverse inferences cannot be 8 drawn if the privilege is invoked. Those reporting on 9 this Inquiry are asked to continue to bear these 10 principles in mind if any witness seeks to claim the 11 protection of this privilege. 12 The second point which I'd like to emphasise is that 13 this cart before the horse issue does not mean that the 14 Inquiry will refrain from entering areas which are also 15 the subject matter of the police investigation. When 16 I come to analyse the terms of reference, I will explain 17 that such a self-denying ordinance would not be the 18 right approach. 19 In general terms, what we need to do in instances 20 where our Inquiry does overlap with the police 21 investigation is to ensure that we adduce an adequate 22 body of evidence, some of it quite general, to enable 23 you to provide a sufficient narrative of relevant 24 culture, practices and ethics. 25 "Sufficient narrative" is likely to be a recurring</p> <p style="text-align: center;">Page 14</p>	<p>1 bud for these reasons: in July, the setting up of this 2 Inquiry enjoyed cross party support as well as the 3 support of the devolved administrations. I should make 4 it clear that the territorial scope of this Inquiry is 5 not limited to England and Wales. Under section 3 of 6 the Constitutional Reform Act 2005, government must 7 respect the independence of the judiciary. Not merely 8 is the judiciary independent of government; it is free 9 from the sort of pressures which are capable of being 10 applied by the press on government and politicians. The 11 same applies to the independent bar. The free press 12 will therefore report the proceedings of this Inquiry as 13 they see fit, subject to pre-existing legal constraints, 14 and the Inquiry will continue to discharge its public 15 functions regardless of any crossfire. 16 But there are two further issues which may cast 17 a shadow over the business of this Inquiry. First, the 18 Inquiry's concern that journalists may be fearful of 19 speaking out against their employers for fear of their 20 jobs and careers. The Inquiry will no doubt receive 21 evidence of good press culture, practices and ethics, 22 and certainly should not assume this evidence is 23 unreliable, but at the same time the Inquiry needs to 24 hear all possible sides of the story. Those who have 25 witnessed wrongdoing are encouraged to summon the moral</p> <p style="text-align: center;">Page 16</p>

<p>1 courage to speak out. For its part, the Inquiry is 2 willing to consider granting protective measures for 3 whistleblowers with justified concerns. 4 Secondly, the press, both within this Inquiry room 5 and outside it, possess highly articulate voices in 6 favour of its interests. There's nothing wrong in that, 7 save that the Inquiry must be vigilant to ensure that 8 the loud voice of the press does not drown out the 9 voices of other interested parties. 10 Thus far I've set out the challenges and the 11 problems but I should not be interpreted as suggesting 12 that they are insurmountable. I should say something 13 about the role of counsel to the Inquiry so that it is 14 made explicit. We are not prosecuting counsel or tasked 15 with the duty of arguing any particular case or point of 16 view. We are entirely neutral. Insofar as we may have 17 opinions about a particular topic, we're going to keep 18 these unexpressed. 19 The possibility that on rare occasions we might fail 20 to keep to these very high standards cannot be 21 overlooked, but to the extent that an errant opinion is 22 ever expressed, that will be our opinion and not yours. 23 No inferences can be drawn as to what you may be 24 thinking. 25 We are here to ensure that all sides of the argument</p> <p style="text-align: center;">Page 17</p>	<p>1 culture, practices and ethics of the press. It may be 2 helpful to take those three terms together. 3 We are looking at practices which may be widespread 4 rather than isolated and sporadic, practices which may 5 be widespread insofar as they are bad practices, may 6 well flow from systems which are broken and/or from 7 attitudes and mores which are dysfunctional. The more 8 we may see patterns of behaviour and practices which are 9 generic and the more widespread they are, the more it 10 may be possible to infer the existence of broken 11 systems, dysfunctional attitudes and mores, and overall 12 the existence of a culture which tends to explain why 13 these problems are occurring in the first place. 14 In most institutions, cultural problems of this 15 nature will usually emanate from high up within the 16 organisation, but this will not always be the case. 17 They will not always be the product of a deliberate 18 policy decision made by those with power within the 19 organisation to make them. Sometimes the existence of 20 a culture derives from the operation of more subtle and 21 complex forces, from historical trends, from what is 22 condoned and not stamped upon, leading to insidious 23 evolution and perpetuation, from complacency leading to 24 arrogance and purlblindness. There is clearly a range of 25 possibilities.</p> <p style="text-align: center;">Page 19</p>
<p>1 are represented and that the evidence advanced to the 2 Inquiry in due course is presented in a fair and 3 balanced manner. This is not to say that witnesses will 4 not be thoroughly probed as appropriate. They will be. 5 Additionally, we will take up lines of questioning 6 suggested by the core participants and explore avenues 7 suggested to us by your assessors, our own Internet and 8 other researchers or whoever. 9 In short, we will call and probe the evidence in 10 seeking out the truth. We're looking to establish both 11 a sufficient and balanced narrative of the culture, 12 practices and ethics of the press as a springboard for 13 helping to devise practical and workable solutions which 14 are proportionate to any problem that has been 15 identified and which are likely to enjoy the confidence 16 of the public. 17 These solutions will not necessarily have been the 18 solutions which the press themselves would have devised 19 had they been asked to devise them, but they will have 20 to be workable in the real world and will need to 21 reflect the technical realities both today and in the 22 immediate future, most particularly the challenges posed 23 by the Internet. 24 I've said that I will analyse the terms of 25 reference. You are required to inquire into the</p> <p style="text-align: center;">Page 18</p>	<p>1 For the purposes of this Inquiry, it may neither be 2 possible nor necessary to undertake an examination of 3 these more subtle and complex forces. Let me make the 4 point in this way: if in relation to a particular press 5 institution, you were to reach the provisional 6 conclusion that a practice or a range of practices were 7 widespread, thematic or even endemic, it might not be 8 too difficult to draw the inference that this practice 9 or these practices stemmed from a culture which promoted 10 or permitted their occurrence. Yet it might not matter 11 whether the culture actively promoted the practice on 12 the one hand or merely failed to prevent the practice 13 occurring on the other. On either version, we have 14 a cultural problem. We have systems which have failed 15 and we have an organisational ethos which has 16 contributed to the existence of illegal or and/or 17 unethical practices. 18 If one sees evidence of institutional attempts to 19 cover up past misdemeanours, it may be possible to draw 20 the inference from such evidence that these past 21 misdemeanours were systemic and the cover-up itself may 22 be a different manifestation of the same cultural 23 problem. 24 On the other hand, as you yourself have pointed out, 25 it is obvious that specific illegal or clearly unethical</p> <p style="text-align: center;">Page 20</p>

<p>1 conduct could indeed exemplify culture, practices or 2 ethics either in a particular newsroom or more widely 3 and it is an extremely important part of the picture. 4 It is not, however, the only evidence that may be 5 relevant to the background. Increased pressure on 6 news room with reducing staff and tight financial 7 constraints, the impact of 24/7 reporting and the 8 immediate availability of news on the Internet, the use 9 of casual or freelance staff and the pressure, whether 10 expressly thrust upon them or impliedly felt by them, to 11 name but a few issues that have been mentioned, may all 12 constitute important elements of the wider picture. 13 Thus far I am conscious that my analysis is in 14 danger of sounding somewhat abstract. It was 15 deliberately so because in setting out the ground rules, 16 I did not wish to deal with any particular factual 17 situations through fear of appearing to pre-judge the 18 issue. 19 In referring to the press as I have done, there is 20 a danger of appearing to treat a series of separate 21 organisations as if they were a single monolithic 22 intuition. There may well be different cultures in 23 different newspapers groups or in different sections of 24 the press. Even if the Inquiry were to conclude that 25 a culture existed in a particular newspaper, that would</p> <p style="text-align: center;">Page 21</p>	<p>1 the code of practice designed to regulate behaviour. 2 Finally, and more controversially, conduct may be 3 unethical because most right-thinking people would hold 4 that it was wrong, even if it was neither illegal or in 5 violation of a relevant human right or current code of 6 practice. This may well be a somewhat subjective area 7 but if there is a sufficient moral consensus in support 8 of change, the right course may well be to consider 9 amendments to the relevant code of practice. 10 In order properly to investigate culture, practices 11 and ethics, it may not be necessary to look into the 12 fine detail, because the endeavour is to seek out 13 systems and patterns of behaviour. In relation to phone 14 hacking, delving into the detail may, as we've seen, 15 clash with the police investigation. The approach, as 16 I have said before, is likely to be macroscopic rather 17 than microscopic. However, what level of magnification 18 we choose to apply in any given instance will depend on 19 our instinct, judgment and overall sense of the 20 direction the Inquiry needs to take. 21 For reasons of convenience, you have decided to 22 divide part one of the Inquiry into a number of modules. 23 Module one concerns itself with the relationship between 24 the press and the public, module two with the 25 relationship between the pleasant and the police, module</p> <p style="text-align: center;">Page 23</p>
<p>1 not mean that everyone working within that newspaper at 2 the time was inevitably tarnished by it. The dangers of 3 stereotyping are obvious and will be avoided. 4 Although the Inquiry will be testing the proposition 5 that there may be cultural differences between tabloid, 6 middle market and broadsheet newspapers, it will not be 7 doing so in the light of any pre-conceived judgments 8 about their respective systems. We start from a clean 9 slate. 10 Issues may also be very different in relation to the 11 regional titles. There, journalists feel that they are 12 being tarred with the same brush as the national press, 13 so confidence in them is being affected. Their focus is 14 very much on their local communities whom they have to 15 face day to day and who would react very adversely, as 16 they sometimes do when the national press arrives, to 17 breaches of ethical standards. 18 I'm not going to attempt any further definition of 19 terms and I'm certainly not going to insult either you 20 or anyone else by explaining what the word "ethics" 21 means, save to this limited extent: conduct may be 22 unethical because it is illegal. Very often, it is 23 illegal because it is unethical. Conduct may also be 24 unethical not because it is illegal but about because it 25 violates an important human right or because it violates</p> <p style="text-align: center;">Page 22</p>	<p>1 three with the relationship between the press and 2 politicians, and in module four, we will be addressing 3 the broader policy questions of what changes should be 4 made to the regulatory system in order to address the 5 findings of modules one to three. 6 No one is suggesting that these modules form 7 self-contained packages. Clearly they do not, and we 8 are dealing with a number of concentric circles. One 9 constant theme, though, may be this: the alleged 10 subterranean influences operated by the press on the 11 democratic process but without full democratic 12 accountability. 13 In practical terms, the overlap between the modules 14 may mean that exceptionally, witnesses called in module 15 one may have to return for module three. On the other 16 hand, a number of module three witnesses will also be 17 relevant to module one. The principal focus of these 18 opening submissions will be module one, but I will 19 sketch out the likely scope and the subject matter of 20 modules two and three before I conclude. 21 As you know, many of the issues likely to inhabit 22 part one of this Inquiry were aired during the course of 23 the three seminars which took place in early October. 24 I will seek to pick up on some of the key themes which 25 emerged as I proceed in my analysis of the issues. One</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 point which may have struck up, though, is that we were 2 treated to two competing narratives. 3 According to the first of these -- and I advance 4 them in no particular order -- the press is, generally 5 speaking, a force for great public good. It educates, 6 it entertains, it holds the powerful, including 7 government, to account. Although the press may be 8 working under considerable commercial pressure, the 9 importance of this should not be overstated. These 10 pressures have always existed in one form or another. 11 Most journalists are decent people and the far greater 12 pressure is to produce the best possible story to the 13 highest personal and professional standards. 14 The public on this narrative have a real interest in 15 the affairs of celebrity, particularly where there is an 16 apparent clash between an affected public persona and 17 private transgression. "Hypocrisy" is the noun which is 18 often deployed in this context and the role of the press 19 is to hunt it down and to expose it. Thus, on this 20 analysis, private transgression becomes a matter for 21 legitimate public comment. 22 The exponents of this narrative would say that the 23 press is already hidebound by an oppressive series of 24 legal constraints which have a chilling affect on 25 legitimate activity. These legal constraints range from Page 25</p>	<p>1 put out and the facts are therefore tailored to meet 2 that narrative. By the same token, the editor has an 3 instinctive understanding of what his or her proprietor 4 might want, even if there is no direct interference from 5 above. 6 The story on this narrative will often strike 7 a chord with the prejudices of the reader because the 8 whole objective, after all, is to increase circulation 9 and revenues in an increasingly competitive and 10 unprofitable commercial environment. 11 Those advancing this version of press culture and 12 ethics would say that journalists will not shrink from 13 deploying underhand methods, necessarily illegal 14 methods, provided they believe that they can get away 15 with it. The power of the press and its influence over 16 people's lives is such that it believes itself to be 17 almost above the law. 18 Moreover, in deciding whether or not the public 19 interest might justify the prima facie invasion of 20 personal privacy, editors are entirely parti pris to the 21 exercise and are guilty of the self-same subjective and 22 relativistic approach which they condemn in High Court 23 judges. 24 Put simply, the public interest is very often 25 deployed as some sort of trump card. If it is too Page 27</p>
<p>1 the existing panoply of law, through Draconian libel 2 laws, to the manufacture of a burgeoning and oppressive 3 privacy law by High Court judges who are not 4 democratically accountable and who apply their own 5 highly subjective and relativistic standards. One High 6 Court judge receives particular opprobrium. 7 Further, the press complain that the system of 8 conditional fee agreements exploited by unscrupulous 9 lawyers inures to their disadvantage because the cost of 10 litigation is so punishingly high that often they have 11 no choice but to settle even defensible cases. 12 Finally on this narrative, the press may well accept 13 that activities such as phone hacking went beyond one 14 rogue reporter at the News of the World, although they 15 would be keen to exclude their own title from these 16 activities. Whatever the position here, the Augean 17 stables have already been cleaned. This happened some 18 time ago now, and there is no further dung to be found. 19 That's one narrative. The contrary narrative works 20 along these lines: the press in general, and the tabloid 21 press in particular, ruthlessly exploit unscrupulous 22 methods in pursuit of at story which will boost the 23 circulation figures of their particular title. Very 24 often, the story is preordained by the narrative the 25 journalist instinctively knows the editor will wish to Page 26</p>	<p>1 loosely defined, it ends up with the press delving into 2 the affairs of those who are celebrities and those who 3 are not in a way which unethically penetrates a domain 4 which ought to remain private. The press say that they 5 are holding hypocritical people to account, but those 6 doing the holding are themselves unaccountable and 7 hypocritical. 8 The proponents of this narrative would also point to 9 the recent revelations of surveillance activities 10 carried out by a private investigator on the 11 instructions of News International. These revisions 12 would suggest that the stables are not necessarily clean 13 of dung. 14 Now, in putting forward these competing narratives, 15 I'm not necessarily doing justice to those who expound 16 either of them. To that extent it matters little, 17 because we'll be hearing from the relevant people once 18 the Inquiry begins to receive evidence and they can put 19 the case in their own way. 20 My point at this stage is to set out the parameters 21 of the debate and to recognise that the exponents of the 22 good press position and the bad press position would 23 appear to be quite a long way apart. 24 At the conclusion of this Inquiry, you may wish to 25 consider which of these narratives is true. Of course, Page 28</p>

<p>1 it's possible that you may decide that neither is true 2 because the truth lies somewhere in between. Life is 3 sometimes like that. 4 More interestingly -- and this point has been made 5 by some insightful commentators upon your seminars -- 6 you may decide that both narratives are true, in the 7 sense that everything depends on one's perspective or 8 everything depends on which side of a complex, 9 three-dimensional polygon one happens to be viewing, 10 describing on any specific occasion. Nor, of course, 11 are we talking about scientific truth. We're talking 12 about something which is more elusive, namely what is or 13 may be a matter of opinion. 14 I'm going to talk about bad practices, some of which 15 are known in the trade as "the dark arts", but it's 16 right that I should start with the good. In the words 17 of one of the contributors to your seminars, most of the 18 content of the press on most days is unobjectionable and 19 some of it is of the highest quality. It is not for 20 this Inquiry to pronounce from on high on anyone's taste 21 on reading matter or entertainment. I recognise that 22 the media cater to a whole range of different world 23 views, that they are perfectly entitled to be 24 opinionated, irreverent, sceptical, credulous, 25 facetious, trivial, obsessive, and to encourage others</p> <p style="text-align: center;">Page 29</p>	<p>1 terms of reference, and if relevant evidence is 2 forthcoming, it will be considered. How far this 3 evidence will take you and what, if anything, the 4 Inquiry might do about it may be another matter. 5 There is a higher constitutional point in play, 6 namely the importance of a free press in a mature 7 democracy. We simply cannot pay lip service to this 8 principle, even if a free press is second nature to the 9 public life of the United Kingdom. A free press 10 developed incrementally in this country over 11 a considerable period of time, with landmark events 12 en route to this destination, such as the litigation in 13 the 1760s involving John Wilkes and the North Briton. 14 But even in some European countries today the press is 15 not free, and elsewhere there are shining examples of 16 the good and egregious examples of the bad. 17 The importance of a free press is almost 18 self-evident. The press holds the powerful to account 19 and is therefore an important curb on potential abuse of 20 executive and corporate power. At its best, the press 21 espouses unpopular causes and gets to the bottom of 22 scandals which would otherwise be left uninvestigated. 23 It is essential in a functioning democracy that the 24 press be permitted to discharge these vital functions 25 and to that extent, it is inevitable that not everybody</p> <p style="text-align: center;">Page 31</p>
<p>1 to think the same, and to express themselves in the 2 style appropriate to their subject matter. 3 But the point I'm making goes still further. One 4 matter which came out very strongly in your seminars was 5 that many journalists who write pieces in the more 6 popular sections of the press are able to encapsulate 7 often complex ideas in short, pithy, entertaining and 8 punchy stories which retain the interests of the reader. 9 The ability to do this takes as much skill as the 10 ability to write a good leader in a broadsheet. 11 Individual newspapers must cater for the tastes and 12 interests of their core readership. Ultimately, as some 13 judges in the highest courts have expressly recognised, 14 the press have an obligation to entertain and they need 15 to sell their product in order to continue to do so. 16 I have mentioned a range of world views. 17 I understand that members of the scientific community 18 may be providing the Inquiry with evidence along the 19 lines that much real harm is done by certain sections of 20 the press who, it is said, do not always apply the 21 scientific method to their reports or commentaries upon 22 matters of topical scientific interest. It could be 23 said that reporting which is not evidence-based is 24 inaccurate within the meaning of the editors' code. 25 This issue and issues like it are not outside your</p> <p style="text-align: center;">Page 30</p>	<p>1 will be happy with what they do all of the time. 2 It is easy to give some concrete examples of the 3 good and the cutting edge, but I'll do so nonetheless. 4 The phone hacking story was the result of assiduous and 5 tenacious reporting by The Guardian, at one stage in the 6 face of a critical report by the PCC. 7 The thalidomide scandal was brought to the forefront 8 of public concern by the similarly tenacious work of the 9 Sunday Times, who purchased court documents for a 10 considerable sum when the paper knew or ought to have 11 known that they could only be used for the purposes of 12 litigation between the then plaintiffs and the drug 13 company. 14 The MPs' expenses scandal was exposed by the 15 Daily Telegraph, which, as is well known, paid for 16 a computer disk or similar electronic device in 17 circumstances where it might be said that the underlying 18 data was stolen. 19 I choose my words carefully, since I'm aware that 20 the Daily Telegraph has provided the Inquiry with 21 a witness statement which deals with the legality of 22 what they did, and one understands the issue about 23 whether intellectual property can, in principle, be 24 stolen at all. 25 I should add that even if one were to conclude, for</p> <p style="text-align: center;">Page 32</p>

<p>1 the purposes of argument, that the Daily Telegraph was 2 handling stolen goods -- and I'm not submitting at this 3 stage that this is a conclusion you should reach -- 4 public interest arguments would always enter into the 5 equation here, since the CPS would not prosecute 6 a particular case if they assessed that it was not in 7 the public interest to do so.</p> <p>8 However, in determining relevant standards, the 9 regulator as opposed to the criminal court will 10 doubtless have regard to the circumstances in which the 11 information in issue was obtained but will not 12 necessarily treat these as conclusive. That said, for 13 the purposes of any coherent regulatory system, the 14 starting point must be this: that news gathering methods 15 which amount to criminal conduct could not begin to be 16 justified without establish be an overwhelming public 17 interest, and even that may not be sufficient.</p> <p>18 Another extremely cogent example of good 19 journalistic practice has been provided by the editor of 20 Sunday Times in an article he wrote this year, "Why 21 investigative journalism is a force for good".</p> <p>22 Mr Witherow reminds us that in 1984, a Sunday Times 23 journalist, Mr Swain, used old-fashioned blagging 24 techniques to connect Gaddafi's terrorist paymaster with 25 Mr Abbasi, another Libyan-backed terrorist operating out</p> <p style="text-align: center;">Page 33</p>	<p>1 work, the press is constrained by the law, in particular 2 the civil law of defamation, privacy and the confines of 3 the Reynolds fair comment in the public interest 4 defence. Whether privacy in particular is an effective 5 safeguard is an issue we will need to address.</p> <p>6 Much investigative journalism relies on covert 7 methods, if not a measure of deception. Very often, the 8 end product can be justified in the public interest. 9 Speaking more generally, what can be justified in the 10 public interest and how can it be justified lies at the 11 very epicentre of this Inquiry. I will therefore need 12 to examine this issue with more care at a later stage 13 today, but in the meantime, before turning to the issue 14 of bad journalism and the dark arts, I would like to 15 cite a paragraph or two from the Sunday Times article 16 I have already mentioned:</p> <p>17 "The expose of how Scargill was seeking financial 18 support from Gaddafi caused an uproar and was a public 19 relations disaster from which the Marxist leader of the 20 NUM never recovered. No two investigations are ever the 21 same, but Swain's story bore certain hallmarks. To get 22 to the truth, he had to lie and deceive. He had to 23 access confidential information by blagging: by 24 pretending to be someone else and extracting the details 25 from the hapless victim. If he had not done so, the</p> <p style="text-align: center;">Page 35</p>
<p>1 of Doncaster. The journalist blagged that information 2 from a British Telecommunications operator, having 3 received details of a telephone number. He then visited 4 Mr Abbasi, who eventually confirmed that the National 5 Union of Mine Workers was seeking financial support from 6 Gaddafi.</p> <p>7 I summarise the story, and for reasons of time omit 8 some necessary detail, but what is interesting here is 9 that if Mr Swain's underhand measures might prima facie 10 have constituted an offence under the Data Protection 11 Act 1984 -- and that would depend on a number of 12 factors, not least on whether that Act was enforceable 13 at the relevant time -- he would surely have had a cast 14 iron public interest defence. If you read Mr Witherow's 15 article in full, it is clear that the journalist was not 16 acting on a wing or a prayer, but had very good ground 17 to suspect that the Doncaster phone number was being 18 used by a terrorist.</p> <p>19 These are only four examples and there are many 20 more. Nor are these example confined to the broadsheet 21 press. The Inquiry has received a large volume of 22 evidence covering the good work of other sections of the 23 press in espousing good causes, rectifying wrongs and in 24 investigating abuses of power.</p> <p>25 It is also true that in carrying out this essential</p> <p style="text-align: center;">Page 34</p>	<p>1 story might never have appeared and the public would 2 have been none the wiser. In other words, the end 3 justified the means. That is the fine line that every 4 editor has to walk when judging what methods to use to 5 gather information. The absolute test must be that the 6 story is in the public interests -- that people have the 7 right to know because they are being deceived. It is 8 a subjective test, and in the end, the public and the 9 courts decide whether the paper has made the right call. 10 The journalists' code ascribes this public interest as 11 exposing 'a serious misdemeanour' and preventing the 12 public from being misled by some statement or action of 13 an individual or organisation. The law on data 14 protection also allows journalists to access private 15 information if it is in the public interest and this is 16 a key plank in any defence on significant stories. At 17 the Sunday Times, the role of investigative journalism 18 is to hold officialdom to account at whatever risk. 19 Yes, we bend the rules, engage in subterfuge, 20 impersonate people and show the 'rat cunning' that Nick 21 Tomalin, a great Sunday Times reporter who died for his 22 trade, said was essential in every successful 23 journalist. Without these techniques, the powerful 24 would be protected. We would not tolerate fishing 25 expeditions in the hope of finding out information."</p> <p style="text-align: center;">Page 36</p>

<p>1 Then Mr Witherow proceeds to discuss the 2 News of the World phone hacking issue. 3 The concept of a fishing expedition is no doubt 4 a useful one and can be expanded on. Using subterfuge 5 simply on the off chance of discovering some wrongdoing 6 is not, borrowing directly from phraseology used by the 7 Press Complaints Commission, a sufficient justification 8 for the use of these methods. There should be 9 reasonable grounds for the Inquiry, including an 10 evidence base for those grounds. The time for assessing 11 whether these reasonable grounds exist is before the 12 methods are used, not retrospectively. 13 In borrowing material from the Sunday Times, 14 I should not be interpreted as necessarily agreeing with 15 Mr Witherow. All I do say is that you may think he has 16 encapsulated the issue rather well. 17 We'll be hearing a lot more about good journalistic 18 practices when the press witnesses come to give their 19 evidence, but I'm also duty-bound to tell you something 20 about bad journalistic practices, about illegal and/or 21 unethical conduct, and at this point in my opening, 22 I propose to do so. 23 The distinction has already been drawn between means 24 and ends. Ultimately the Inquiry is likely to be most 25 interested in unlawful and/or unethical news gathering</p> <p style="text-align: center;">Page 37</p>	<p>1 voicemails is just one example of illegal and/or 2 unethical intrusion; not electronic surveillance or 3 intrusion as such, but using deceptive techniques to 4 gain access to an electronic database. 5 That said, one must not lose site of the fact that 6 in some of the examples given the practice is 7 undoubtedly illegal. In others, the practice is or may 8 be unethical. 9 Secondly, we know of examples in the public domain 10 of stealing information to gain access to personal data. 11 These examples range from rifling through dustbins -- 12 the patois for this is "binnology" -- to more prosaic 13 cases of stealing personal diaries or other forms of 14 hard data. I have already touched on the far less 15 controversial example of the Daily Telegraph's MPs' 16 expenses story. 17 Then we have evidence of old-fashioned, less 18 technologically-based modes of intrusion. Here I have 19 in mind reporters and photographers hidden in bushes, 20 paparazzi overstepping the bounds of acceptable 21 behaviour and some of the examples given in Peter 22 Burden's book "Fake Sheiks and Royal Trappings", in 23 particular the Bob and Sue Firth story at pages 105 to 24 118. 25 The News of the World reporter at the centre of that</p> <p style="text-align: center;">Page 39</p>
<p>1 methods, although we will not lose sight of evidence to 2 the effect that the article itself may be a gross breach 3 of privacy or an egregious distortion of the truth, even 4 if wholly ethical means were used to obtain the 5 underlying material. 6 At this stage, therefore, I'll be concentrating on 7 improper news-gathering methods. Here we are talking 8 about a range of techniques and methodologies. 9 Violations of privacy in some shape or form are constant 10 themes here and subterfuge a common theme. 11 We will be considering the following categories of 12 press misbehaviour, always accepting that in some of the 13 examples I will give, it may be argued by some that the 14 behaviour in question is in fact justified in the public 15 interest. 16 First we will be hearing evidence about a range of 17 electronic surveillance or intrusion, the interception 18 of communications, covert listening device, cinecameras 19 hidden in wardrobes, bugged telephones in private 20 apartments, cameras hidden behind two-way mirrors and 21 the more mundane example of the use of telephoto lenses. 22 Some of these will be covered in the oral evidence you 23 will hear, others are in the public domain. Yet others 24 are summarised in the evidence Mr Matthew Parris has 25 given to the Inquiry. He reminds us that hacking into</p> <p style="text-align: center;">Page 38</p>	<p>1 story is the same News of the World reporter who was at 2 the centre of Mr Mosley's privacy action against News 3 International, tried by Mr Justice Eady in 2008. He 4 also happens to be the subject but not the immediate 5 recipient of the famous "for Neville" email referred to, 6 for example, at paragraphs 412 to 416 of the report of 7 the Culture, Media and Sport Select Committee, dated 8 9 February 2009. 9 The recipient of the email was Mr Glenn Mulcaire. 10 Neville Thurlbeck's position, according to hearsay 11 evidence set out in the Select Committee's report, is 12 that he's never seen that email nor had any knowledge of 13 it. 14 Fourthly and more controversially, the Inquiry has 15 evidence of agent provocateur techniques and some of 16 these are fully in the public domain. "Confessions of 17 a Fake Sheik" by Mr Mazher Mahmood, now of the 18 Sunday Times, has been read by the Inquiry teams and 19 we've also received a witness statement from him 20 pursuant to a section 21 notice. 21 It should be recorded that Mr Mahmood prides himself 22 in these methods and that his evidence was recently 23 instrumental in bringing the Pakistani spot-fixing 24 cricketers to justice. However, some would argue that 25 his methods are questionable and that there are</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 instances where the ends do not justify the means. We 2 will need to explore this with Mr Mahmood when he gives 3 his evidence. 4 Next we have situations where payments are made for 5 stories, whether to sources, witnesses or private 6 detectives. Module one is not directly concerned with 7 possible police corruption issues. 8 I should not be interpreted as saying that such 9 payments would always or even usually be objectionable. 10 My point at this stage is to identify the possible 11 issues. Human nature being as it is, many sources will 12 not provide information free of charge, although the 13 other side of the coin, human nature being as it is, is 14 that many sources, including those working within 15 government in the wider sense of the term, or the 16 police, are more than happy to do so. 17 But as regards those for whom payment is a necessary 18 incentive, issues arise in general terms as to whether 19 this form of commercial pact enhances the risk that the 20 information provided by the source may be untrue or 21 malicious, or inherently more likely to amount to 22 a breach of privacy. 23 The press may say that this situation is really no 24 different from that which obtains in relation to police 25 informants. The fact that police sources are often paid</p> <p style="text-align: center;">Page 41</p>	<p>1 law may be perpetrated in order to secure the 2 information sought. 3 Here I am referring primarily to breaches of the 4 Data Protection Act and what is commonly known as 5 blagging, the impersonation of someone else in order to 6 extract personal data from an official source or an 7 entity such as a mobile phone company. 8 A specific example of this is, of course, 9 Operation Motorman and the work of the 10 Information Commissioner in relation to the activities 11 of a particular private investigator, Steve Whittamore. 12 I will cover this topic in a moment. 13 Aside from the question as to whether the 14 journalists who tasked Mr Whittamore may have been 15 implicated in his criminal activities -- and this is 16 a big question -- the Inquiry will be particularly 17 interested in systems in place in the individual print 18 titles to handle and scrutinise the payment of invoices 19 submitted by a private investigator. 20 The broader question of the use of sources raises 21 sensitive and emotive issues. Under the 22 Contempt of Court Act 1981 and article 10 of the 23 European Convention, journalists are entitled to protect 24 their sources. The public interest in favour of this 25 principle is both sound and obvious and relatively</p> <p style="text-align: center;">Page 43</p>
<p>1 for valuable information is a fact of life and it does 2 not logically lead to a lower quality of intelligence. 3 Furthermore, just as an experienced police officer will 4 instinctively know whether a source can be trusted, the 5 same principle applies to journalists. A police 6 informant's tip will need to be corroborated by other 7 convergent evidence, as indeed will that provided by 8 a journalist source. These are all questions which the 9 Inquiry may need to consider. 10 Payments to private investigators or detectives are 11 capable of falling into a different category. Here 12 I would wish to define my terms. The press, in common 13 with many institutions, including solicitors, use search 14 agencies to locate pieces of information which are in 15 the public domain. This practice raises no privacy 16 issues. 17 Private investigators or detectives use different 18 methods in order to seek out information and data which 19 are not in the public domain. To be clear, a private 20 investigator may well deploy perfectly proper standards 21 and as the Inquiry will hear in due course, some are 22 responsibly regulated. However, it would not be unfair 23 to comment that the very nature of the job entails 24 a risk that the personal privacy of the target may not 25 be respected, or more seriously, that breaches of the</p> <p style="text-align: center;">Page 42</p>	<p>1 uncontroversial. 2 What is of keen interest to this Inquiry is how 3 sources are paid, how their invoices are scrutinised 4 internally and, most importantly, the extent to which 5 this modus operandi of a source may be known or deduced 6 or ignored, by, for example, the editor, whose ultimate 7 responsibility it is to check the accuracy of 8 a particular story and to check that the means by which 9 the information was obtained was lawful. 10 I am still on my overview of improper or arguably 11 improper news-gathering methods and I'm coming, I think, 12 to my fifth category, phone hacking. One might include 13 the related activities of computer and email hacking, 14 which are also illegal, albeit under different statutory 15 provisions. This Inquiry has seen much less evidence of 16 computer and email hacking. These require a greater 17 degree of technological know-how and may well be harder 18 to detect. One would not like to speculate without 19 evidence how much computer and email hacking has been 20 going on. 21 I've already made the point that phone hacking is 22 just one form of subterfuge. Morally, it may not be 23 very different in quality from many others. Further, 24 telephonic interception is not some new phenomenon. In 25 the days when the mobile phone network operated on an</p> <p style="text-align: center;">Page 44</p>

<p>1 analogue system, it was possible to purchase radio 2 devices for less than £100 which enabled the operator to 3 listen in on all mobile phone traffic within 4 a particular radius. Presumably, this was precisely how 5 the Prince of Wales' phone was intercepted in 1989 and 6 private communications were recorded.</p> <p>7 This practice was illegal under the Interception of 8 Communications Act 1985 without a licence from the 9 Secretary of State. In the sort of context I have 10 mentioned, it could not be justified in the public 11 interest. Since the late 1990s, all I would wish to say 12 at this stage is that it has become more difficult and 13 certainly more expensive to intercept digital 14 communications.</p> <p>15 I will summarise the present state of the evidence 16 in relation to phone hacking shortly.</p> <p>17 My last category of improper or arguably improper 18 news-gathering methods is a catch-all one, and here is 19 the concern is as much the end product published as 20 methods deployed. Next week, the Inquiry will be 21 receiving a considerable body of evidence from a range 22 of individuals who say that they are the victims of 23 unfair, oppressive and unethical press practices.</p> <p>24 Included within this evidence are victims of phone 25 hacking, but at this juncture I am describing my Page 45</p>	<p>1 differ as to what exactly is meant by the term "public 2 figure" -- but others most certainly are not. Whether 3 there is a distinction between those who court celebrity 4 and those who would assiduously wish to avoid it is 5 something the Inquiry may wish to consider under the 6 overall rubric of privacy.</p> <p>7 But the point I am making here is that the further 8 away one moves from the heartland of investigative 9 journalism, properly so-called -- this is journalism in 10 the public interest -- to the hinterland of a form of 11 journalism whose end product, some might say, is really 12 no more than a menage of gossip, tittle-tattle, 13 entertaining anecdote and prurient Inquiry, the more 14 difficult it may be to justify intrusive journalistic 15 methods and intrusive publications. Like it or not, one 16 cannot get away from the subject matter.</p> <p>17 The criminal trial in the phone hacking scandal was 18 all about hacking into the voicemails of members of the 19 royal household. This was not investigative journalism 20 in any recognisable sense of that term. It was 21 a fishing expedition where the precise species of fish 22 could not be ascertained in advance, but where the 23 overall objective was clear: to uncover new stuff about 24 the royals.</p> <p>25 The aspiration, of course, was that the fish, once Page 47</p>
<p>1 catch-all category. The Inquiry will be hearing from 2 individuals from a number of walks of life, some of whom 3 are celebrities in the sense in which that term is 4 ordinarily understood, others of whom clearly are not. 5 Their evidence is disparate, which may be one of its 6 virtues. The common themes are complaints of systematic 7 breaches of privacy, of conduct amounting to harassment 8 and of unfair, sensationalist and inaccurate reporting. 9 The Inquiry will need to consider whether these 10 complaints are substantiated and whether they constitute 11 evidence of a bigger picture.</p> <p>12 I will be returning to the bigger picture towards 13 the end of my submissions, because this is what part one 14 of this Inquiry is all about. I am not, of course, 15 ignoring the fact that the Inquiry will need to have 16 a critical mass of reliable evidence before the contours 17 of that bigger picture may be discerned.</p> <p>18 At this stage, I think it's worth adverting to one 19 aspect of the bigger picture which might already be 20 obvious, and it is the following: in relation to many 21 but not all of the allegedly improper news-gathering 22 methods I have been examining, I have been examining the 23 subject of press interest in the private lives of 24 individuals. Some of these individuals may be public 25 figures -- and I appreciate that reasonable people may Page 46</p>	<p>1 caught, would be dished up as spicy morsels, as piquant 2 insights into the private lives of the royal family, and 3 the same principle applies to the other individuals who 4 featured on the original Goodman-Mulcaire indictment.</p> <p>5 Aside from the specific case of phone hacking, 6 which, to be fair, no member of the press has sought to 7 go justify, the Inquiry will need to consider the range 8 of public interest justifications which are advanced for 9 the type of journalism I am describing. In any event, 10 it will need to consider whether, turning the tables 11 around, as it were, there is really a public imperative 12 in doing more to address this particular problem.</p> <p>13 It might be argued in certain quarters that one of 14 the by-products of a free and uncensored press is 15 collateral damage. The press may say there is always 16 a public interest in exposing hypocrisy and that there 17 is a public interest in freedom of expression itself. 18 Part of the duty of the press is to entertain; otherwise 19 its readership will desert. Even if, as one editor said 20 at your seminars, the Hampstead liberal with his gilded 21 lifestyle may not be interested in this sort of fare, 22 that really is none of his business, and by extension, 23 it is none of the Inquiry's business.</p> <p>24 I should not be interpreted as expressing any 25 judgment on these intractable questions, but I note that Page 48</p>

12 (Pages 45 to 48)

<p>1 we keep returning to the main theme of this module of 2 your Inquiry: what does the public interest mean and who 3 judges it? 4 I turn now to the issue of the Data Protection Act 5 and the work of the then Information Commissioner, 6 Mr Richard Thomas. 7 Data protection legislation was first enacted in 8 1984 but further, more detailed provisions came into 9 force in 2000, following the enactment of the Data 10 Protection Act 1998. This was a complex piece of 11 legislation designed to bring domestic law into line 12 with EU directives. 13 The target of the Data Protection Act is not the 14 press or journalists. The primary purpose of the act is 15 to ensure that data controllers -- that is to say, those 16 who hold the personal data of others -- take sufficient 17 steps to protect it. Nor is the Act primarily concerned 18 with the criminal law. 19 However, under section 55 of the Data Protection 20 Act, it is a criminal offence, subject to a number of 21 listed defences, to obtain or disclose personal data or 22 the information contained in personal data without the 23 consent of the entity lawfully holding that data, namely 24 the data controller. This includes the activity of 25 blagging, the obtaining of personal information by Page 49</p>	<p>1 through the agency of Mr X, knowing its provenance. 2 All this is subject to the defence under section 55 3 of the Act that -- and I quote: 4 "... in the particular circumstances, the obtaining, 5 disclosing or procuring was justified as being in the 6 public interest." 7 This sets out an objective test: 8 "It is not the individual's belief which is 9 relevant. The court must be satisfied to the 10 appropriate standard that in the particular 11 circumstances the act in question was justified as being 12 in the public interest." 13 One of the reasons why I dwelt on the Gaddafi 14 example in 1984 is that here we see evidence of a solid 15 public interest justification. It was good evidence 16 which linked a particular telephone number with 17 terrorist activities. So there it was legitimate for 18 the journalist to blag further information out of BT, 19 and in the result, critical additional pieces of the 20 jigsaw emerged. 21 It is important to underscore the point that the 22 journalist was not embarking on a fishing expedition. 23 With the information already at his disposal, he could 24 be reasonably optimistic of finding gold dust. 25 Furthermore, the subject matter of his investigation was Page 51</p>
<p>1 deception. 2 Hence, if Mr X were to pretend that he was a person 3 with a legitimate interest in obtaining personal data 4 from a data controller and thereby persuade an employee 5 of the data controller to give up that information, the 6 essential ingredients of the offence would be made out. 7 In the real world, Mr X is usually a private 8 investigator and the data controller concerned could be 9 HMRC, a driving and vehicle licensing agency, a mobile 10 phone company, an organ of the NHS or those responsible 11 for the police national computer. 12 Mr X may operate by deception as his preferred 13 technique, but there may also be a corrupt or 14 unscrupulous employee located within one of these 15 organisations prepared to give up information to Mr X 16 for reward or otherwise, self-evidently without the 17 agreement of his principal. 18 Mr X is prima facie guilty of an offence because he 19 procures the obtaining of personal data or discloses it, 20 on our facts, to a newspaper without the consent of the 21 data controller. If there is evidence that a journalist 22 has tasked Mr X to obtain confidential information for 23 him, the journalist would also be guilty of an offence, 24 on the basis that he is an accessory at common law or on 25 the footing that he has procured such information Page 50</p>	<p>1 serious and self-evidently of public concern. 2 The issue of criminal offences under the Data 3 Protection Act is unlikely to excite much public 4 interest, still less, revulsion. The topic is somewhat 5 recherche in nature. The Data Protection Act as a whole 6 is a difficult statute to grasp and the whole issue may 7 be more to the taste of an intellectual prospect lawyer 8 than the ordinary member of the public. 9 However, the issue is an immensely important one 10 because all of us entrust our personal data, which 11 includes confidential information, to data controllers, 12 and none of us would wish to these those confidences 13 abused. This topic is only an arid one until it hits 14 home. 15 Hence, the work of the Information Commissioner is 16 important and this Inquiry needs to examine what 17 inferences and lessons may be drawn from 18 Operation Motorman. 19 LORD JUSTICE LEVESON: Mr Jay, I think that's probably 20 a convenient moment, before we start on that exercise. 21 The shorthand writer has been working very hard for an 22 hour and a quarter and it's about time she had a break, 23 so I'll rise for just a few minutes. 24 (11.45 am) 25 (A short break) Page 52</p>

13 (Pages 49 to 52)

<p>1 (11.55 am)</p> <p>2 MR JAY: Operation Motorman. The story, in a nutshell, is</p> <p>3 as follows, and here I am summarising a number of</p> <p>4 sources: the Information Commissioner's two reports,</p> <p>5 "what price privacy?" and "What price privacy now?", the</p> <p>6 detailed evidence Mr Thomas has given to the Inquiry and</p> <p>7 which we will hear reasonably shortly, chapter 7 of</p> <p>8 Nick Davies' book, "Flat Earth News", the chapter</p> <p>9 entitled "The Dark Arts", and other online materials.</p> <p>10 Essentially, it is clear that the</p> <p>11 Information Commissioner's office had long suspected the</p> <p>12 existence of an organised trade in confidential personal</p> <p>13 information, its suspicion's being confirmed when, in</p> <p>14 late November 2002, the ICO attended a search under</p> <p>15 warrant of the premises of John Boyall, a Surrey-based</p> <p>16 private detective, which search was conducted by the</p> <p>17 Devon & Cornwall Police.</p> <p>18 The raid concerned the suspected misuse of data from</p> <p>19 the police national computer by former and serving</p> <p>20 police officers. Documents seized during the course of</p> <p>21 the raid were then linked to vehicle checks carried out</p> <p>22 within the DVLA by two officials.</p> <p>23 In the words of the Information Commissioner's first</p> <p>24 published report, corruption was the stark conclusion</p> <p>25 and two investigations were subsequently launched: The</p> <p style="text-align: center;">Page 53</p>	<p>1 King, and in February 2004, the CPS charged all four men</p> <p>2 with conspiracy offences. In due course, all four men</p> <p>3 pleaded guilty. The sentence in each case was</p> <p>4 a conditional discharge.</p> <p>5 It would be fair to say that the</p> <p>6 then-Information Commissioner, Mr Thomas, was somewhat</p> <p>7 frustrated by this outcome. He will deal with this in</p> <p>8 detail when giving his evidence.</p> <p>9 This Inquiry is not in fact concerned with the</p> <p>10 conduct or fate of these four individuals. What is of</p> <p>11 interest to this Inquiry is the possible involvement of</p> <p>12 the press in procuring and then receiving this</p> <p>13 confidential information.</p> <p>14 In the words of the Information Commissioner, when</p> <p>15 dealing with the documentation seized during the course</p> <p>16 of the March 2003 raid:</p> <p>17 "... it was the wealth of detail which was to prove</p> <p>18 so valuable to our knowledge of the illegal market in</p> <p>19 personal information: ledgers, workbooks and invoices</p> <p>20 detailing who had requested the information, precisely</p> <p>21 what information they were given, how much they were</p> <p>22 charged and how much was paid to associates who actually</p> <p>23 obtained the information."</p> <p>24 It should be noted that the client, the person who</p> <p>25 had requested the information, was not always</p> <p style="text-align: center;">Page 55</p>
<p>1 Information Commission's officers' Operation Motorman</p> <p>2 into data protection offences and a police investigation</p> <p>3 into possible corruption.</p> <p>4 On 8 March 2003, search warrants obtained by the ICO</p> <p>5 led the investigation to an address in New Milton,</p> <p>6 Hampshire, the premises of Steve Whittamore, another</p> <p>7 private detective, and to two men who worked for him.</p> <p>8 Documentation seized from Whittamore's premises showed</p> <p>9 that he worked with a number of associated who were able</p> <p>10 to supply him with data, most of which was unlawfully</p> <p>11 obtained from a number of sources, including BT</p> <p>12 accounts, other telephone companies, DVLA records,</p> <p>13 credit card statements, bank statements and the police</p> <p>14 national computer.</p> <p>15 I will deal with the scale of this documentation in</p> <p>16 a moment. Whittamore was in some sort of partnership or</p> <p>17 similar relationship with Boyall. Together they</p> <p>18 appeared to have a network of corrupt officials who, for</p> <p>19 a consideration, supplied specialist information.</p> <p>20 Central amongst these was Paul Marshall,</p> <p>21 a communications officer at Tooting police station, who</p> <p>22 retrieved information from ex-directory phone numbers</p> <p>23 and vehicle registration details to criminal records.</p> <p>24 This afternoon was handed to Whittamore and Boyall</p> <p>25 by an intermediary, a retired policeman called Allen</p> <p style="text-align: center;">Page 54</p>	<p>1 a journalist, and this Inquiry is only concerned with</p> <p>2 the clients who were. When the seized information was</p> <p>3 analysed, the following picture emerged.</p> <p>4 In the previous three years alone, 305 different</p> <p>5 journalists had asked Steve Whittamore for a total of</p> <p>6 13,343 differently items of information. These 305</p> <p>7 journalists worked for a total for 21 newspapers and 11</p> <p>8 magazines, although some journalists worked for more</p> <p>9 than one publication.</p> <p>10 A fuller breakdown of the 305 breakdown appears in</p> <p>11 tabular form in Mr Thomas' second report. Out of the</p> <p>12 transactions positively identified, 952 were attributed</p> <p>13 to the Daily Mail, with 58 different journalists</p> <p>14 involved. We will hear more about this in evidence.</p> <p>15 But the Sunday people came next in the list, with 802</p> <p>16 transactions and 50 journalists, then the Daily Mirror</p> <p>17 with 802 transactions and 45 journalists, the Mail on</p> <p>18 Sunday with 681 transactions and 33 journalists, and the</p> <p>19 News of the World with 228 transactions and 23</p> <p>20 journalists. I do not burden my opening submissions by</p> <p>21 reading out all of the different newspapers.</p> <p>22 Toward the bottom of the list, we can see the</p> <p>23 Sunday Times and the Times newspapers, whose</p> <p>24 transactions feature in single figures. The Guardian,</p> <p>25 the Independent and the Financial Times are not on the</p> <p style="text-align: center;">Page 56</p>

<p>1 list.</p> <p>2 The 13,343 separate transactions were then analysed</p> <p>3 by the Information Commissioner's office. It found that</p> <p>4 1,998 of them were too vague to allow any definite</p> <p>5 conclusion. Of the remainder -- and this is information</p> <p>6 obtained pursuant to an FOI request -- 5,025 were</p> <p>7 assessed to constitute clear breaches of the Data</p> <p>8 Protection Act and 6,330 probable breaches of the Act.</p> <p>9 These assessments were reached having regard to the</p> <p>10 nature of the information and to the price paid for it.</p> <p>11 The price paid for 3,291 pieces of information was</p> <p>12 over £164,000. The identities of the journalists</p> <p>13 involved have not been vouchsafed by the</p> <p>14 Information Commissioner's office. In answer to</p> <p>15 a Freedom of Information Act request, their identities</p> <p>16 were cyphered. However, from the information provided,</p> <p>17 it is clear that a number of journalists made prolific</p> <p>18 numbers of illegal or probably illegal requests. The</p> <p>19 most prolific runs to 679. One journalists commissioned</p> <p>20 some £26,000 worth of transactions.</p> <p>21 Criminal proceedings were never taken against any of</p> <p>22 the journalists. The precise reasons for this will need</p> <p>23 to be examined carefully with Mr Thomas, although one</p> <p>24 reason he gives is that he could not be completely</p> <p>25 confident that the public interest defence would not</p> <p style="text-align: center;">Page 57</p>	<p>1 possibility in paragraph 5.3 of his first report:</p> <p>2 "This was not just an isolated business operating</p> <p>3 occasionally outside the law, but one dedicated to its</p> <p>4 systematic and lucrative flouting. Nor could its</p> <p>5 customers escape censure. Some of the information</p> <p>6 contained, such as PNC checks, ex-directory telephone</p> <p>7 numbers and details of frequently dialled numbers,</p> <p>8 cannot normally be obtained by such businesses by lawful</p> <p>9 means. Others, such as personal addresses, can be</p> <p>10 obtained lawfully only by the old foot-slogging means,</p> <p>11 such as personal checks to the full electoral register.</p> <p>12 Prices charged for some pieces of information raise</p> <p>13 questions about their provenance. Either the price was</p> <p>14 too low for information obtained lawfully, as in the</p> <p>15 case of personal addresses, or it was high enough to</p> <p>16 indicate criminal activity, as in criminal records</p> <p>17 checks."</p> <p>18 In due course, I will be inviting Mr Thomas to</p> <p>19 expand on this particular paragraph.</p> <p>20 Apart from the forensic issues which I had</p> <p>21 foreshadowed, there are two further issues I should</p> <p>22 mention at this stage. It may or may not be possible to</p> <p>23 get to the bottom of these, but they will certainly be</p> <p>24 explored.</p> <p>25 First, there is evidence from a former employee of</p> <p style="text-align: center;">Page 59</p>
<p>1 apply.</p> <p>2 In this respect, two matters are worthy of note.</p> <p>3 First, none of the four conspirators in their criminal</p> <p>4 proceedings sought to rely on any public interest</p> <p>5 defence. Presumably they took the view, on advice, that</p> <p>6 such a defence would not run. As Mr Thomas explains in</p> <p>7 the context of their cases, it is not surprising that</p> <p>8 this view was taken, given that this activity was in the</p> <p>9 nature of a fishing expedition and the public interest</p> <p>10 would need to be identified before the information was</p> <p>11 obtained, disclosed or procured, not afterwards.</p> <p>12 Secondly, if Mr Thomas is right about the public</p> <p>13 interest defence in relation to the private</p> <p>14 investigators, it is not immediately obvious why an</p> <p>15 equivalent reasoning process does not apply to the</p> <p>16 journalists. It was they, after all, who commissioned</p> <p>17 the individual transactions. In any event, the burden</p> <p>18 would have been on the journalist to raise the defence</p> <p>19 and its strength could then have been separately</p> <p>20 assessed.</p> <p>21 It might be said in relation to the journalists that</p> <p>22 it could not necessarily be proven according to the</p> <p>23 criminal standard that they knew that they were</p> <p>24 obtaining information in breach of the Data Protection</p> <p>25 Act. Here is what Mr Thomas has to say about that</p> <p style="text-align: center;">Page 58</p>	<p>1 the ICO which suggests that the extent of wrongdoing</p> <p>2 went significantly further than the 13,343 transactions</p> <p>3 I have mentioned and that Mr Thomas and his deputy took</p> <p>4 a specific policy decision not to bring proceedings</p> <p>5 against individual journalists because they were afraid</p> <p>6 of the power they wielded.</p> <p>7 Secondly, the Daily Mail has given evidence to the</p> <p>8 Inquiry which certainly suggests that the information</p> <p>9 its journalists may have procured was entirely innocuous</p> <p>10 information which did not evidence the commission of any</p> <p>11 criminal offences.</p> <p>12 The Information Commissioner's two reports, both</p> <p>13 published in 2006, did not attract a lot of press</p> <p>14 interest at the time. I will not speculate as to the</p> <p>15 possible reasons for this.</p> <p>16 Mr Thomas' first witness statement to the Inquiry</p> <p>17 draws to your attention some interests exchanges he had</p> <p>18 with the PCC. He asked the PCC to fire a clear warning</p> <p>19 shot to the press about the risks of breaking the law.</p> <p>20 In due course, we will hear about this and the PCC's</p> <p>21 reaction to this request.</p> <p>22 One of Mr Thomas' recommendations was that</p> <p>23 section 55 of the Data Protection Act should be amended</p> <p>24 so as to increase the maximum penalty for this offence</p> <p>25 from a fine to a two-year period of imprisonment for</p> <p style="text-align: center;">Page 60</p>

<p>1 a conviction on indictment. Mr Thomas' evidence to the 2 Inquiry is very illuminating on this issue. To cut 3 a long story short, section 77 of the Criminal Justice 4 and Immigration Act 2008 was initially to contain 5 a provision which reflected Mr Thomas' recommendation. 6 The quid pro quo was a strengthening of the public 7 interest defence, see section 78, introducing a new 8 provision into section 55 of the Data Protection Act, 9 which would have changed the test from being objective 10 to subjective. However, a late intervention by the then 11 Prime Minister led, from Mr Thomas' account, to 12 a classic legislative compromise. These legislations 13 entered the statute book but did not have immediate 14 force of law. A separate statutory instrument would be 15 needed to bring them into effect and none has been laid 16 before Parliament to date.</p> <p>17 Mr Thomas' evidence contains in microcosm a number 18 of the key issues which form the subject matter of part 19 one of this Inquiry. I have in mind the extent of press 20 misconduct in the possible existence of a culture, the 21 press response to the Information Commissioner's 22 response and then the political response to his 23 recommendations. That said, one appreciates that the 24 Whittamore raid took place in March 2003, and some might 25 say that all of this is water under the bridge.</p> <p style="text-align: center;">Page 61</p>	<p>1 form since 1997, first as a research consultant employed 2 by a private company, and then, after 2001, through his 3 own company.</p> <p>4 The first formal contract between Mulcaire's company 5 and the News of the World covers the annual period 6 beginning on 1 September 2001. Under it, he received 7 weekly remuneration at an annualised rate of 8 £92,000 per annum.</p> <p>9 When his business premises were raided by the 10 police, the investigating officers found a contract 11 between the News of the World and an entity called Nine 12 Consultancy Ltd, which was Mulcaire's company at that 13 time, covering the 12-month period beginning on 1 July 14 2005. Under this contract, Mulcaire undertook to carry 15 out a research and information service, in return for 16 which he would be paid £104,988. The payment of this 17 amount is shown on News of the World's books.</p> <p>18 One obvious question which arises is this: what was 19 the exact nature of the services Mulcaire was contracted 20 to provide? It was accepted at the criminal trial that 21 the £104,000 was paid in exchange for the delivery of 22 legitimate services and that illegitimate activities 23 were covered by separate cash payments, but evidence has 24 come to light which suggests differently.</p> <p>25 The criminal proceedings were limited to an</p> <p style="text-align: center;">Page 63</p>
<p>1 I come now to the issue of phone hacking, in 2 particular the unlawful access of mobile phone 3 voicemails. My endeavour here is not to undertake 4 a close forensic examination of all the evidence so that 5 every blood vessel and sinew is exposed. I will do that 6 when we reach part two, which certainly will not be 7 starting imminently.</p> <p>8 Instead, I propose to attempt a somewhat less 9 punctilious but perhaps more difficult exercise: to 10 provide you with an overview with an over-arching 11 synthesis which might enable the Inquiry to assess the 12 possible breadth of this illegal activity, if not its 13 depth. If that exercise is successfully conducted, then 14 insights into -- and possible conclusions about -- any 15 relevant culture or cultures might be capable of being 16 drawn.</p> <p>17 My point of departure is inevitably the 18 News of the World and the Goodman-Mulcaire proceedings 19 which culminated in guilty pleas and a sentencing 20 hearing before Mr Justice Gross, as he then was, 21 in January 2007.</p> <p>22 Mr Clive Goodman, as is extremely well-known, was 23 the royal editor of the News of the World, and 24 Mr Glenn Mulcaire was a private investigator who 25 probably had been working for the paper in some shape or</p> <p style="text-align: center;">Page 62</p>	<p>1 eight-month period, November 2005 to June 2006. Under 2 counts 1 to 15 of the indictment, it was alleged that 3 Goodman and Mulcaire conspired to commit breaches of 4 section 1 of the Regulatory of Investigatory Powers Act 5 2000, RIPA, by working together to gain access to the 6 voicemail messages of three members of the royal 7 household. The purpose of gaining access to the 8 messages was to obtain confidential information with 9 a view to it being published in the News of the World 10 newspaper.</p> <p>11 In order to make good this indictment, the 12 prosecution had to prove a common purpose or scheme 13 between the two men. It would have been sufficient for 14 the prosecution to have proved that it was only Mulcaire 15 to actually gained access to voicemails pursuant to this 16 scheme, although there was evidence that Goodman made 17 some of the calls into the system.</p> <p>18 Furthermore, for the purposes of a conspiracy 19 allegation, the prosecution did not have to prove that 20 the fruits of this activity ever found their way into 21 the News of the World in the form of stories, though 22 here again there was some evidence that they did.</p> <p>23 Under counts 16 to 20 of the indictment, it was 24 alleged that Mulcaire alone accessed the voicemails of 25 five other individuals in breach of section 1 of RIPA.</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 It was not alleged that he did so pursuant to any 2 arrangement with Goodman. The prosecution did not seek 3 to prove to the criminal standard that Mulcaire was 4 working with others within News International. 5 I will need to examine counts 16 to 60 with 6 particular care for obvious reasons, but at this stage 7 I note that the five individuals I mentioned in the 8 context of these counts, although I haven't yet named 9 them, would not have been of interest to the royal 10 editor. This must have been obvious to 11 News International at all material times, by which 12 I mean anyone within the company equipped with a basic 13 familiarity with these facts. 14 I will turn to counts 1 to 15 and to Mulcaire's 15 modus operandi. I can simplify it: in order to gain 16 access to voicemail messages remotely -- in other words, 17 from a telephone other than the mobile phone paired with 18 its voicemail -- typically you need to have possession 19 of a unique retrieval number and a pin number. I say 20 "typically", because arrangements differ slightly across 21 the mobile networks. If I gain access to the voicemail 22 of my phone by telephoning in from a landline or 23 wherever, using a unique retrieval number and a pin 24 number, then so can anyone else. 25 Finding out the pin number was not that</p> <p style="text-align: center;">Page 65</p>	<p>1 telephone installed at the offices of News International 2 in Wapping. 3 When Mulcaire's premises were raided, the police 4 found a number of notebooks containing details of the 5 scheme of interception. These notebooks were of 6 particular interest to the Inquiry. In relation to 7 counts 1 to 15, their contents were explained by 8 prosecuting counsel to Mr Justice Gross. 9 The information varied from page to page, but very 10 often, one could see the name of the individual member 11 of the royal household targeted, his or her mobile phone 12 number, his or her unique retrieval number, the pin 13 number, which had been set to default, and finally the 14 number of the network service provider. 15 The notebook evidence by itself did not prove that 16 the voicemails had been accessed, but in the case of 17 counts 1 to 15, there was other evidence which 18 established that fact, because the police had analysed 19 call data from the various phones I had referred to and 20 had made the link. 21 On many but not all of the notebook pages, there is 22 to be seen one extra piece of evidence, namely at the 23 top left-hand corner of the page, a first name. In 24 relation to counts 1 to 15, the prosecution opened the 25 case to Mr Justice Gross on the basis that the first</p> <p style="text-align: center;">Page 67</p>
<p>1 straightforward, and here Mulcaire had to use underhand 2 methods. His practice was to telephone the customer 3 services department of a mobile phone provider and to 4 persuade the company to reset the pin to its default 5 setting. In order to do this, he needed to use 6 a company password in order to convince company services 7 that he was acting legitimately. 8 It is more than a reasonable inference that Mulcaire 9 had some sort of illicit pathway to two key pieces of 10 information: first, the unique retrieval numbers paired 11 with a particular mobile phone; secondly, the company 12 passwords which would give him credibility when he spoke 13 to customer services. These passwords were often 14 changed for security purposes, so Mulcaire's channels of 15 information must have been ongoing. 16 It is not entirely clear how Mulcaire had access to 17 the unique retrieval numbers, or, as it happens, to 18 other confidential mobile phone data. I have mentioned 19 illicit pathways. These include the possibility of both 20 blagging and corruption. 21 In relation to counts 1 to 15, Mulcaire used 22 landlines located within his office and another 23 telephone installed in some way in a cash point machine. 24 Goodman made some calls from his home address, and more 25 pertinently for our purposes, from a fixed link</p> <p style="text-align: center;">Page 66</p>	<p>1 name was Clive, which was Goodman's given name. This 2 provided further evidence of a conspiracy. 3 Investigating officers in Operation Weeting carried 4 out further analyses of the Mulcaire notebook. This has 5 proven to be a painstaking and challenging exercise. At 6 this stage, I can give some further information about 7 counts 1 to 15, since not all of these left hand corner 8 names were Clive. 9 In relation to one of the members of the royal 10 household who was the target in counts 1 to 15, the 11 corner names were "Clive" or "Private" or someone I'm 12 going to called "A". You have ruled that A should be 13 cyphered in these proceedings, although I have been told 14 his or her identity. The revelation of A's identity is 15 not necessary for part one purposes and might cause 16 prejudice to the police investigation. 17 One possible inference to be drawn is that A was 18 working with or for Goodman and that he or she may have 19 instructed Mulcaire to carry out a particular voicemail 20 interception operation. It might be argued that A could 21 have been acting independently of Goodman, but that 22 would not make much sense since we know that Goodman was 23 the royal editor and we also know that targets 1 to 15 24 were members of the royal household. 25 I have mentioned the consultancy agreement between</p> <p style="text-align: center;">Page 68</p>

<p>1 Mulcaire's company and News International. There was 2 also evidence before Mr Justice Gross that Mulcaire 3 received cash payments in the aggregate sum of £12,300 4 between November 2005 and August 2006. These payments 5 were made by Goodman, although he made corresponding 6 expenses claims on the company. In relation to these 7 claims, the identity of the source, Mulcaire, was 8 protected, since h was described in News International's 9 books as Alexander.</p> <p>10 As prosecuting counsel explained to 11 Mr Justice Gross, the payment records showed that there 12 were payments to Alexander in relation to Fergie, SAS, 13 Will, Harry and Chelsy, Harry, Harry, Wills, Wills. 14 This provides some indication of the sort of information 15 that was being provided.</p> <p>16 We need to branch out into counts 16 to 20. 17 Count 16 concerned Mr Max Clifford, the well-known 18 publicity consultant. His clients are well outside 19 Goodman's bailiwick, the affairs of the royal family.</p> <p>20 Count 17 concerned Mr Skylet Andrew, the well-known 21 management and public relations consultant with a client 22 basis including, most notably, professional footballers.</p> <p>23 Count 18 concerned Mr Gordon Taylor, the chief 24 executive of the Professional Footballers' Association.</p> <p>25 Count 19 concerned Mr Simon Hughes MP, who probably</p> <p style="text-align: center;">Page 69</p>	<p>1 that."</p> <p>2 Here, Mr Justice Gross was referring to the 3 possibility of giving a deterrent sentence.</p> <p>4 Interestingly, in mitigating his client's case on 5 his behalf, defence counsel for Goodman said this: 6 "Mr Goodman has lived his life in a world where -- 7 and I say this with some trepidation -- ethical lines 8 are not always clearly defined or at least observed." 9 Transcript, page 70, letter E.</p> <p>10 In his sentencing remarks, Mr Justice Gross said 11 this: 12 "As to counts 16 to 20, you have not dealt with 13 Goodman but with others at News International. You had 14 not been paid anything because no stories had resulted." 15 Transcript, page 179, letter H.</p> <p>16 In relation to non-payment, this is what 17 Mr Justice Gross had been told. Whether it was true is 18 debatable. As it was clearly understood by 19 Mr Justice Gross that there were almost certainly other 20 anonymous co-conspirators, if I can put it in those 21 terms, perhaps that is hardly surprising.</p> <p>22 Back in 2006 and 2007, the prosecution did not seek 23 to bring these co-conspirators within the scope of its 24 proceedings. Perhaps they felt that the evidence was 25 insufficient to prove the case to the criminal standard.</p> <p style="text-align: center;">Page 71</p>
<p>1 needs no introduction.</p> <p>2 The same applies to the subject matter of count 20, 3 Ms Elle McPherson.</p> <p>4 From my understanding of the criminal proceedings 5 culminating in the hearing before Mr Justice Gross, the 6 prosecution did not seek to deploy Mulcaire's notebook 7 in an attempt to link Mulcaire with any particular 8 employee within News of the World. Strictly speaking, 9 there was absolutely no need to do so before 10 Mr Justice Gross, because only Mulcaire's name was on 11 the indictment in relation to counts 16 to 20 and there 12 was therefore no purpose in bringing in other employees 13 of the company.</p> <p>14 However, it is noteworthy that Mr Justice Gross 15 himself was alive to the practical realities. At 16 page 68H of the transcript of those proceedings, he 17 said: 18 "The picture painted by that paragraph [and here he 19 was referring to a paragraph in the Goodman pre-sentence 20 report], certainly read together with Mr Mulcaire's 21 pre-sentence report, although I know that they are 22 separate documents -- but if you look at the picture 23 together, there is a climate in which such activities 24 are or might become commonplace, and that I regard as 25 a feature which I must consider, so I give notice of</p> <p style="text-align: center;">Page 70</p>	<p>1 Perhaps they felt that the overriding imperative was to 2 close this operation down in such a way that there would 3 not be a repeat. Perhaps there are other plausible 4 explanations.</p> <p>5 Addressing the issue neutrally, it should be 6 emphasised that the criminal standard of proof is a high 7 one. Juries are directed that they must not find 8 a defendant guilty unless they are sure of guilt. 9 Nothing less than that will do.</p> <p>10 It remains to be determined how you should approach 11 the standard of proof in relation to any findings you 12 make in your report, but in written submissions we 13 placed before you on 4 October, it was suggested in line 14 with standard practice in this area that insofar as you 15 should apply a standard of proof to determinations of 16 fact under the 2005 Act, the civil standard of the 17 balance of probabilities should govern.</p> <p>18 It is not our purpose under part one to identify the 19 other individuals within News International who were or 20 might have tasked Mulcaire to hack into voicemails. 21 However, it does need to be established that they 22 existed, and we can do that with reference to a range of 23 evidence.</p> <p>24 First, there is evidence which entered the public 25 domain after the criminal trial. For example, according</p> <p style="text-align: center;">Page 72</p>

<p>1 to the report of the Culture, Media and Sports Select 2 Committee published in February 2010, on 4 February 3 2005, Mulcaire, using the pseudonym Paul Williams, and 4 Greg Miskiw, the then assistant news editor of the 5 News of the World, signed a contract which gave Mulcaire 6 exclusive rights in relation to the information or 7 pictures bearing on the private life of Gordon Taylor in 8 return for the News of the World agreeing to pay 9 Mulcaire at least £7,000.</p> <p>10 This document does not, of course, prove that 11 Mulcaire would need to be accessing voicemails in order 12 to obtain the information in question, still less that 13 Mr Miskiw knew that. We have a note to count 17 that 14 Mr Mulcaire did access Gordon Taylor's voicemail. This 15 guilty plea related to the period February 2005 to June 16 2006, although in the subsequent civil proceedings, the 17 period alleged was January 2005 to May 2006.</p> <p>18 According to the same Select Committee report, on 19 29 June 2005, a reporter of the News of the World sent 20 an email to Mr Mulcaire which opened with the words: 21 "This is a transcript for Neville". According to 22 paragraph 412 of the Select Committee's report, there 23 followed a transcription of 35 voicemail messages. In 24 13 cases, the recipient of the message was GT, Gordon 25 Taylor, and in 17 cases, Joe Armstrong.</p> <p style="text-align: center;">Page 73</p>	<p>1 Thirdly, we have evidence emerging from the civil 2 proceedings which are due to come to trial in the 3 Chancery Division at the end of January 2012. 4 Mr Sherborne will no doubt be telling you more about 5 those proceedings. The claimants in the civil 6 proceedings are not limited to the targets of counts 16 7 to 20 on the original Mulcaire indictment. Indeed, some 8 of these individuals have not brought civil claims. 9 We'll be hearing from some of the civil claimants next 10 week.</p> <p>11 The claimants' developed case in the civil 12 proceedings is that the system operated within 13 News of the World was essentially a conspiracy, whereby 14 Mulcaire and employees of that organisation would work 15 together to access voicemails for the purposes of 16 excavating pieces of information which could then form 17 the subject matter of stories in the paper.</p> <p>18 My fourth point is that News International had 19 provided the Inquiry team with a list of the admissions 20 they have made in those civil proceedings where 21 proceedings have been issued. I will deal with those 22 admissions in the following matter: putting to one side 23 the Siena Miller case for one moment, News international 24 have made admissions in about a dozen civil claims along 25 the lines that Glenn Mulcaire had gained access to</p> <p style="text-align: center;">Page 75</p>
<p>1 In June 2005, there was only one Neville on 2 News International's staff at the time, namely the chief 3 reporter, Neville Thurlbeck. I have already made it 4 clear that he has denied any knowledge of the email or 5 the associated transcript.</p> <p>6 Our second point is that in the context of counts 16 7 to 20, the police's analysis of the Mulcaire notebook -- 8 and again, it is an analysis carried out in the context 9 of Operation Weeting -- is that the corner names in Max 10 Clifford's case were either "A" or "Private" or "A 11 private".</p> <p>12 "A" is a cypher and I should make it clear that it 13 is the same "A" who I have mentioned in the context of 14 counts 1 to 15. In Skylet Andrew's case, the corner 15 name was "I". In Gordon Taylor's case, the corner name 16 was "A". In Simon Hughes' case, the corner names were 17 A, B and C. There was also one illegible corner name. 18 In Elle McPherson's case, the corner names were "B" and 19 "Private".</p> <p>20 So we have a range of corner names. I know the 21 names in each case, but obviously do not know anything 22 about the corner name "private" or its significance. We 23 only have the first name in each of the cases but they 24 happen to tie up with the first names of employees of 25 News International.</p> <p style="text-align: center;">Page 74</p>	<p>1 voicemails. The most prolific is probably Skylet 2 Andrew's case where there were 14 successful attempts 3 and 19 failed attempts. In some of these claims, 4 News International has also admitted that use was made 5 of confidential information obtained by publishing 6 articles.</p> <p>7 We have noted in relation to these admissions that 8 News International has accepted vicarious liability for 9 the acts of Mulcaire, not for the acts of those within 10 their organisation who tasked or commissioned him, but 11 admissions are usually made on a minimalist basis.</p> <p>12 I deal separately with Sienna Miller's claim. This 13 is my fifth point. In her re-amended particulars of 14 claim dated 11 April 2001, Ms Miller alleged 15 a systematic invasion of her privacy by a series of 16 voicemail interceptions in 2005 and 2006, and an 17 equivalent campaign of harassment for over 12 months.</p> <p>18 She also alleged that between July 2005 and July 19 2006, a number of articles about her were published in 20 the News of the World and that it should be inferred 21 that some or all of the private information contained in 22 these articles were the products of News International's 23 unlawful activities. Finally, she alleged that 24 in September 2008 her email account was hacked into 25 using the same password as her mobile phone password and</p> <p style="text-align: center;">Page 76</p>

<p>1 the private messages were accessed. 2 On 12 May 2011, News International's leading 3 counsel, in proceedings before Mr Justice Vos which were 4 transcribed, admitted all the causes of action pleaded 5 in the re-amended particulars of claim. There was 6 subsequently a statement in open court when Sienna 7 Miller's claim was settled. 8 The upshot in legal terms is that News International 9 thereby admitted those facts which were both necessary 10 and sufficient to found each individual cause of action 11 set out in the pleadings. 12 Paragraph 31 of the re-amended particulars of claim, 13 which alleged by way of an alternative case a common 14 design and/or the counseling and procuring of voicemail 15 hacking by journalists at News International was also 16 admitted. 17 If there is a dispute about this, we need look no 18 further than the transcript of the proceedings before 19 Mr Justice Vos on 12 May 2011, page 3, lines 15 to 16, 20 when Mr Silverleaf, Queen's Counsel, accepted all the 21 pleaded points of claim. The significance of this is in 22 the Sienna Miller litigation, News International went 23 further than in their minimalist admissions elsewhere. 24 Sixthly, reference should be made to Mr Jude Law's 25 claims against the Sun, which is not, from my Page 77</p>	<p>1 Committee that these revelations, which emerged 2 internally in 2008, prompted News International to 3 obtain advice from senior leading counsel as to how to 4 proceed in the litigation. 5 Mr Michael Silverleaf, Queen's Counsel, advised in 6 writing on 3 June 2008. Mr Silverleaf's opinion is in 7 the public domain. Apart from the documentation I have 8 already mentioned, he referred to the existence of 9 a draft article, which may have been based on the 10 voicemail transcript. Mr Silverleaf noted, however, 11 that one News International employee, whose name has 12 been anonymised, disputed that fact. 13 Mr Silverleaf drew certain inferences from the 14 disclosed material which led him to conclude that at 15 least three named individuals within News International, 16 and here I quote: 17 "... appear to have been intimately involved in 18 Mr Mulcaire's illegal researching into Mr Taylor's 19 affairs." 20 It's not necessary for my purposes to comment on 21 those inferences, but I should cite three passages from 22 Mr Silverleaf's opinion. First, and I quote: 23 "There is no public interest in its disclosure ..." 24 Here, he is referring to the personal information 25 relating to Mr Taylor. I continue: Page 79</p>
<p>1 understanding, one of the claims due to be heard 2 next January. Mr Law alleges that his phone was hacked 3 by the Sun, which is part of the News International 4 portfolio of print titles. Part of the evidential 5 matrix in support of his case is a corner name in the 6 Mulcaire notebook which simply states "the Sun" without 7 specifying the individual working there. 8 There's also documentary evidence which we have seen 9 of another corner name relating to the Mirror. 10 Seventhly, I can say more about Gordon Taylor's 11 case. He brought civil proceedings against 12 News International and Mulcaire on the back of the 13 criminal trial. Indeed, he was the very first to do so. 14 His claim was breach of confidence, misuse of private 15 information and invasion of privacy. He did not allege 16 the system that was subsequently to become the basis of 17 pleading the civil claims. 18 News International initially denied these claims. 19 Mr Taylor's lawyers then applied the third-party 20 disclosure against the Metropolitan Police, and secured 21 access to various documentation including the February 22 2005 contract and the "for Neville" email. Mr Taylor 23 amended his pleadings to refer to this material. 24 It is clear from documents recently disclosed and 25 publicised by the Culture, Media and Sport Select Page 78</p>	<p>1 "... which could possible justify the use of 2 unlawful means to obtain information about it." 3 Second citation: 4 "In the light of these facts, it seems to me, as it 5 seems to both my instructing solicitor and to junior 6 counsel, that NGN's prospects of avoiding liability for 7 the claims of breach of confidence and invasion of 8 privacy, bearing in mind Mr Taylor, are slim to the 9 extent of being non-existent. There is overwhelming 10 evidence of the involvement of senior NGN journalists in 11 illegal inquiries into --" 12 Then there are some words redacted. 13 "In addition, there is substantial surrounding 14 material about the extent of NGN's journalists' attempts 15 to obtain access to information illegally in relation to 16 other individuals." 17 Here, Mr Silverleaf is referring to the 18 Information Commissioner's reports. 19 "In the light of these facts, there is a powerful 20 case that there is or was a culture of illegal 21 information access used at NGN in order to procure 22 stories for publication. Not only does this mean that 23 NGN is virtually certain to be held liable to 24 Mr Taylor -- to have this paraded at a public trial 25 would, I imagine, be extremely damaging to NGN's public Page 80</p>

<p>1 reputation ..."</p> <p>2 Now, my third citation:</p> <p>3 "I should at this point mention that when</p> <p>4 Mr Mulcaire was sentenced for the offences noted above,</p> <p>5 it seems to have been accepted by the prosecution and</p> <p>6 the court that his contract with NGN to provide research</p> <p>7 services was for legitimate activities and</p> <p>8 a confiscation order was made only in relation to</p> <p>9 additional cash payments relating to members of the</p> <p>10 royal household. The recently disclosed information</p> <p>11 seems to throw that acceptance into considerable doubt.</p> <p>12 If the trial proceeds, there seems to be little doubt</p> <p>13 that Mr Taylor's case will be advanced on the basis that</p> <p>14 Mr Mulcaire was specifically employed by NGN to engage</p> <p>15 in illegal information-gathering to provide the basis</p> <p>16 for stories to appear in NGN's newspapers."</p> <p>17 These paragraphs from counsel's opinion, trenchantly</p> <p>18 worded, speak for themselves. I'll be returning to</p> <p>19 Mr Silverleaf's point that Mulcaire was not providing</p> <p>20 research services for legitimate activities.</p> <p>21 Mr Silverleaf also advised on quantum. His advice</p> <p>22 was written shortly before Mr Justice Eady's judgment in</p> <p>23 the Max Mosley case, where the claimant received £60,000</p> <p>24 for a breach of privacy claim but failed in his attempt</p> <p>25 to recover exemplary damages. Accordingly,</p> <p style="text-align: center;">Page 81</p>	<p>1 placed into the public domain by the Select Committee</p> <p>2 and by recent evidence given to that committee, but the</p> <p>3 extent to which the Inquiry needs to get to the bottom</p> <p>4 of this issue in part one is debatable.</p> <p>5 What may be of more interest at this stage is the</p> <p>6 window this vignette might give us into the culture of</p> <p>7 this organisation. News International was consistently</p> <p>8 running the public line that Goodman was a rogue</p> <p>9 reporter. It did so from June 2008 until fairly</p> <p>10 recently. This gives rise to obvious questions about</p> <p>11 the culture of the organisation as to how far this went</p> <p>12 up. Was there a culture of denial or, even worse,</p> <p>13 cover-up? Was Mr Taylor paid over the odds to keep</p> <p>14 silent?</p> <p>15 In relation to Mr Silverleaf's opinion, there are</p> <p>16 only two logical possibilities: either its contents were</p> <p>17 communicated to those at a high level in the</p> <p>18 organisation, in which case certain inferences may be</p> <p>19 drawn, or a decision was taken lower down, if I may put</p> <p>20 it in this way, not to communicate its contents to those</p> <p>21 at a high level in the organisation, in which case</p> <p>22 different inferences may be drawn. In either</p> <p>23 hypothesis, we have insight into the culture of</p> <p>24 News International at the time.</p> <p>25 Eighthly, I turn to the issue of the Goodman</p> <p style="text-align: center;">Page 83</p>
<p>1 Mr Silverleaf had little to go on as regards previous</p> <p>2 authority. He did, however, advise that he believed</p> <p>3 that Mr Taylor's damages would be enhanced by various</p> <p>4 aggravating features. His overall conclusion was that</p> <p>5 the court might award a sum at any level from £25,000 to</p> <p>6 £250,000 or possibly even slightly more, although he</p> <p>7 considered that extremely unlikely. Here Mr Silverleaf</p> <p>8 was giving out limits, not realistic parameters. His</p> <p>9 best guess was that the bracket was £100,000 to</p> <p>10 £250,000.</p> <p>11 News International entered into settlement</p> <p>12 negotiations with Mr Taylor's advisers in the light of</p> <p>13 his deeply pessimistic advice. News International's</p> <p>14 payout to Mr Taylor was the sum of £700,000, £425,000 of</p> <p>15 which was attributed to damages and the balance to legal</p> <p>16 costs. The settlement agreement contained</p> <p>17 a confidentiality clause, which is not unusual in this</p> <p>18 type of case. This is a big number, and well in excess</p> <p>19 of Mr Silverleaf's upper bracket.</p> <p>20 There are a number of questions arising out of this</p> <p>21 sequence of events which have an obvious bearing on the</p> <p>22 issue of culture. One issue may be the extent to which</p> <p>23 the most senior executors of News International knew of</p> <p>24 the Silverleaf opinion and the settlement negotiations.</p> <p>25 Some insight into this issue is provided by documents</p> <p style="text-align: center;">Page 82</p>	<p>1 Mulcaire settlements. Once they had served their prison</p> <p>2 terms, each brought proceedings for unfair dismissal in</p> <p>3 the employment tribunal. It was Goodman's case in part</p> <p>4 that senior executives in News International well knew</p> <p>5 what he was doing and condoned it. Mr Goodman was</p> <p>6 questioned about this in internal disciplinary</p> <p>7 proceedings and referred to emails which he believed</p> <p>8 would prove his case. He sought the disclosure of these</p> <p>9 emails but they were never forthcoming,</p> <p>10 News International would say because they do not exist.</p> <p>11 At all events, News International took advice about</p> <p>12 the fairness of their dismissal and was told that the</p> <p>13 statutory dismissal process had not been correctly</p> <p>14 followed. Settlement negotiations then took place and</p> <p>15 the parties came to terms at a figure of £140,000</p> <p>16 inclusive of legal costs. Again, there was</p> <p>17 a confidentiality stipulation.</p> <p>18 Mulcaire, too brought proceedings in the employment</p> <p>19 tribunal. The issues in his case were the same, but the</p> <p>20 settlement figure was more modest, £73,000.</p> <p>21 Goodman's reference to internal emails which proved</p> <p>22 his case sparked off certain lines of investigation</p> <p>23 within News International. Harbottle & Lewis, a firm of</p> <p>24 solicitors, were asked to consider a database or part of</p> <p>25 a database and to advise whether they yielded any</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 evidence of the case Mr Goodman was advancing. 2 The Harbottle & Lewis investigation covered over 3 2,500 emails and related to five senior newspaper 4 employees. 5 In due course, Harbottle and Lewis advised that in 6 their view these emails did not amount to proof that 7 others knew about Goodman and Mulcaire's phone-hacking 8 activity, and this advice was subsequently relied on by 9 News International as supporting their public line. 10 It should be noted that Harbottle and Lewis have 11 subsequently stated that their review was limited and 12 never intended to give News International a clean bill 13 of health for all purposes. By implication, they are 14 criticising News International for placing too much 15 weight on their advice. 16 Whether this is an issue which the Inquiry will need 17 to consider is debatable. What may be more relevant, 18 however, is the fact and level of the settlements 19 reached with Goodman and Mulcaire, since this may be 20 viewed as further evidence of a culture of secrecy and 21 cover-up. 22 Having reached this stage in my submissions, I am 23 able to assist the Inquiry further in relation to the 24 Mulcaire notebook and to provide an overview analysis. 25 The purpose of doing so is solely to provide you with Page 85</p>	<p>1 public domain a number of potentially identifiable 2 persons who appear in this material and who may 3 therefore be victims. The figure they have given is 4 5,795 names. There are 318 outgoing calls to unique 5 voicemail numbers from a variety from phones. Some but 6 a minority of those, may be people legitimately 7 accessing their own voicemails remotely. 8 There are 690 audio recordings by Mulcaire. There 9 are 568 -- 10 LORD JUSTICE LEVESON: 5 -- 11 MR JAY: 586 voicemail messages, mostly messages that were 12 apparently intercepted. There were 64 identifiable 13 individuals who were intended recipients of the 586 14 voicemail messages. There are, in addition, 15 38 recordings of Mulcaire blaggings. 16 The scale of this activity gives rise to the 17 powerful inference that it must have occupied Mulcaire 18 full-time, an inference which is supported by Mark 19 Thomson's evidence to the Inquiry, in particular 20 paragraph 33 of his witness statement, which we will 21 hear next week. 22 Had Mr Michael Silverleaf known of this evidence 23 when he advised, in June 2008, the present inferences 24 which he was prepared to draw from far less cogent 25 material would have been even stronger. Page 87</p>
<p>1 some sense of breadth and depth. My analysis is drawn 2 from the work of officers in Operation Weeting. 3 The Mulcaire notebooks run to some 11,000 pages. 4 They evidence some 2,266 taskings, although some of 5 these relate to the same individual. On occasion, the 6 true targets will not be the person identified in the 7 notebook. Often, the hacking was directed at associates 8 of the true target, with a view to finding information 9 about the true target. 10 Overall, there are about 28 legible corner names. 11 I have already given cyphers to some of these in 12 relation to the counts on the origin indictment. 13 Apart from Goodman, the most prolific users of 14 Mulcaire's services were corner names A, B, C and D. A 15 appears on 1,453 occasions; B, 3,003 occasions; C, 252 16 occasions; and D, 135. This accounts for 2,143 17 taskings. 18 LORD JUSTICE LEVESON: I think for B you mean 303, not 19 3,003. 20 MR JAY: Did I say 3,003? My apologies. 1,453 for A, 303 21 for B, 252 for C and 135 for D. That accounts for 22 2,143. The total number of taskings was 2,266. 23 The other corner names appear infrequently, often in 24 single figures, as the basic arithmetic must suggest. 25 The Metropolitan Police have recently placed in the Page 86</p>	<p>1 According to the Metropolitan Police, 2 News International hacking operation had certainly begun 3 by 2002, Milly Dowler being the first named victim. We, 4 however, have recently seen a document which emanates 5 from May 2001. The police believe that it continued 6 until at least 2009. This belief is not derived from an 7 analysis of the Mulcaire notebooks, which we know were 8 seized back in 2006. 9 What inferences may safely be drawn from this 10 material for the purposes of part one of the Inquiry? 11 My approach will be a parsimonious one, although 12 I should emphasise I have not opened to you all the 13 evidence which is in the public domain. 14 It is clear that Goodman was not a rogue reporter. 15 Ignoring the private corner name and the illegibles, we 16 have at least 27 other News International employees. 17 This fact alone suggests wide-ranging illegal activity 18 within the organisation at the relevant time. Aside 19 from the number of individuals potentially inculpated, 20 we also have evidence of a significant quantity of 21 illegal activity over a relatively lengthy time period. 22 There are a number of ways in which this activity 23 might collectively be characterised. I suggest that it 24 would not be unfair to comment that it was, at the very 25 least, a thriving cottage industry. Page 88</p>

22 (Pages 85 to 88)

<p>1 A public interest defence could not be run at any 2 criminal trial because we know that it does not exist 3 under RIPA. In any event, we have Mr Silverleaf's 4 trenchant view expressed in the context of the civil 5 claims that it would not have run as a defence to the 6 breach of confidence claims either. His opinion was 7 doubtless based on an assessment of the illegality of 8 the means deployed weighed against the sort of 9 information News International was hoping to unearth. 10 With respect, Mr Silverleaf's opinion is obviously 11 right, and I do not imagine this Inquiry will hear 12 a contrary view. 13 In characterising the behaviour of those who partook 14 in these activities, Mr Justice Gross described it "as 15 low as it gets". Apart from being illegal -- this is my 16 language now, not Mr Justice Gross' -- it was grubby, it 17 was underhand and it was high-handed. 18 Maybe individuals, the corner names, did not know 19 that this was illegal. That would, of course, not be 20 a defence. Maybe some thought that public interest 21 defence, as they saw it, justified everything. Maybe 22 the moral compasses of those directly involved were 23 simply pointing way off true north because, after all, 24 so they would say, they owed a wider public duty to 25 expose hypocrisy and to entertain. The public has Page 89</p>	<p>1 be careful. 2 Sir, you are almost the last person who needs a 3 lecture from me as to the criminal law and I am not 4 a criminal lawyer. However, these submissions are not 5 being addressed simply to you and it is important to 6 identify the basic principles. 7 When one comes to corporate governance and ethics, 8 the debate is somewhat broader, but at the same time the 9 Inquiry does not seek to prejudice the criminal 10 proceedings. For the purposes of this Inquiry, 11 News International are likely to find themselves caught 12 on the prongs of Morton's Fork as there are only two 13 logical possibilities: either senior management knew 14 what was going on at the time and therefore at the very 15 least condoned this illegal activity, or they did not, 16 and News International's systems failed to the extent 17 that there was at the very least a failure of 18 supervision and oversight, with possible failures of 19 training, corporate ethos and checking of expenses 20 claims. 21 There is, I suppose, room for the Nelsonian blind 22 eye within this framework. The point I am making is 23 that for either version, we have clear evidence of 24 a generic, systemic or cultural problem. The length and 25 breadth of the illegality enables me to make that Page 91</p>
<p>1 a right to know. Unfortunately, it might be said 2 against them that the same willingness to judge the 3 conduct of their targets on moral grounds does not 4 appear to be self-directed. 5 Questions might be been asked as to how high up in 6 News International the metaphorical buck stops. Here 7 one needs to be careful, particularly in defining one's 8 terms and evaluating the present state of the evidence. 9 Further, the submissions I'm going to make will not 10 cover the possibility of corporate liability under the 11 Data Protection Act or elsewhere. 12 First of all, there is a difference between 13 responsibility in terms of the criminal law and 14 responsibility in terms of corporate governance and 15 ethics. The latter is capable of being much wider than 16 the former. 17 In terms of the criminal law, nothing less than 18 proof to the criminal standard of accessory liability 19 would suffice. By this I mean the following: there 20 would have to be proof that X, within 21 News International, aided, abetted, counseled or 22 procured the relevant breach of section one of RIPA. 23 Hard evidence of this would be required, not 24 speculation and guesswork. Inferences are capable of 25 being drawn in criminal cases but juries are warned to Page 90</p>	<p>1 submission without seeking to unbuckle myself from the 2 straitjacket I have tied around myself, namely that any 3 inferences I would draw would be parsimonious ones. 4 It is, of course, possible to consider a range of 5 other potential influences but I'm not advancing these 6 as submissions, merely as possibilities. I've already 7 mentioned the possibility of a culture of cover-up and 8 denial. This issue is certainly within the reach of the 9 terms of reference and we will need to address it. 10 Consideration may also need to be given as to 11 whether there might have been wider causes in play, both 12 inside and outside the organisation. The existence of 13 such wider causes gives rise to the possibility that 14 these illegal activities may not have been confined to 15 News International, but given the known scale of these 16 activities within News International, this possibility 17 cannot be excluded from account in any event. 18 Part of the mitigation advanced on Goodman's behalf 19 before Mr Justice Gross was that his job was on the line 20 and that he was under constant pressure to come up with 21 new and tantalising stories. These pressures led him to 22 cut corners and to indulge in what might be described as 23 a lazy form of journalism, rather than using 24 traditional, fairer and more time-consuming methods. 25 The cult of celebrity and the quest for this sort of Page 92</p>

<p>1 salacious morsel which might, at best, form the basis 2 for an exclusive story is part of the wider picture 3 because it encourages journalists to yield to the 4 temptation to peer into secret worlds if the technology 5 exists to allow them to do so. Further, if the 6 prevalent zeitgeist is that no limits exist because as a 7 matter of principle, the celebrity's life is altogether 8 in the public domain, then any ethical constraints on 9 such behaviours are much diminished.</p> <p>10 I mentioned the cult of celebrity. I'm not 11 suggesting that the press is solely or even mainly to 12 blame for the existence of this. It is part of a wider 13 phenomenon that human beings tend to enjoy being noseey. 14 The human geneticist might argue that this is part of 15 our DNA, a socialist that it is a cultural matter. This 16 Inquiry is happily not required to resolve this sort of 17 dispute, but it is being asked to consider the bigger 18 picture.</p> <p>19 Nor in this regard is there anything new under the 20 sun. The great American jurists, Warren and Brandeis, 21 writing in the Harvard Law Review back in 1890, said 22 this:</p> <p>23 "The press is overstepping in every direction the 24 obvious bounds of propriety and decency. Gossip is no 25 longer the resource of the idle and of the vicious but</p> <p style="text-align: center;">Page 93</p>	<p>1 newspaper industry took a pass on the News of the World 2 phone hacking story, almost certainly because they too 3 were involved in dark arts."</p> <p>4 My review of phone hacking has been confined to the 5 present state of the evidence relating to the 6 News of the World. However, the Inquiry is beginning to 7 receive evidence to indicate that phone hacking was not 8 limited to that organisation and this will no doubt 9 assist on the issues of culture, breadth and depth.</p> <p>10 Sir, I'm now moving on to a different topic.</p> <p>11 LORD JUSTICE LEVESON: I think that's a very good moment to 12 call a break.</p> <p>13 MR JAY: Thank you.</p> <p>14 LORD JUSTICE LEVESON: We'll resume at 2 o'clock. Thank 15 you. 16 (12.57 pm) 17 (The luncheon adjournment)</p> <p style="text-align: center;">Page 95</p>
<p>1 has become a trade, which is pursued with industry as 2 well as effrontery. To satisfy a prurient taste, the 3 details of sexual relations are spread broadcast in the 4 columns of the daily papers. To occupy the indolent, 5 column upon column is filled with idle gossip which can 6 only be procured by intrusion upon the domestic circle."</p> <p>7 I commend this article to the Inquiry not because 8 I necessarily agree with it but because it provides 9 a counterweight to some of the historical analyses on 10 press freedom which quite rightly have been pressed on 11 the Inquiry by some of the core participants and it 12 contains a pithy and very well-written encapsulation of 13 what is meant by the public interest.</p> <p>14 In touching on these possible wider causes, one is 15 reminded of what Mr Lionel Barber, the editor of the 16 Financial Times, said at his public lecture earlier this 17 year. I quote:</p> <p>18 "Most important of all, the newspaper industry 19 itself did not take the issue secretly (sic) or seek to 20 establish --"</p> <p>21 LORD JUSTICE LEVESON: "Did not take the issue ..."?</p> <p>22 MR JAY: "Seriously". Pardon me.</p> <p>23 "... or seek to establish the truth. Indeed, aside 24 from the lead taken by the Guardian, which was followed 25 by the FT, BBC and the Independent, the rest of the</p> <p style="text-align: center;">Page 94</p>	

A							
Abbasi 33:25	26:13,16 28:9	advisers 82:12	76:2	arguably 15:16	69:24	behaviour 4:23	
34:4	43:10,15 44:13	affairs 25:15	and/or 12:13	44:10 45:17	assume 6:3 16:22	19:8 23:1,13	
abetted 90:21	51:17 63:22	28:2 69:19	19:6 20:16	argue 40:24	attempt 11:18	38:14 39:21	
ability 30:9,10	70:23 76:23	79:19	37:20,25 39:1	93:14	22:18 62:8	89:13	
able 15:25 30:6	81:7,20 89:14	affect 25:24	77:14	argued 38:13	70:7 81:24	behaviours	
54:9 85:23	92:14,16	affords 14:3	anecdote 47:13	48:13 68:20	attempts 20:18	11:22 93:9	
Absence 8:8	activity 25:25	afraid 60:5	announced 11:8	arguing 17:15	76:2,3 80:14	beings 93:13	
absent 7:24 8:21	49:24 58:8	afternoon 54:24	announcement	argument 17:25	attend 8:2	belief 51:8 88:6	
absolute 36:5	59:16 62:12	agencies 42:14	11:9	33:1	attended 53:14	beliefs 2:3	
absolutely 4:6	64:20 85:8	agency 50:9 51:1	annual 63:5	arguments 33:4	attending 8:10	believe 1:6 27:14	
6:13 7:22	87:16 88:17,21	agent 40:15	annualised 63:7	arid 52:13	attention 60:17	88:5	
12:10 70:9	88:22 91:15	aggravating 82:4	annum 63:8	arises 63:18	attitudes 19:7,11	believed 82:2	
abstract 21:14	acts 76:9,9	aggregate 69:3	anonymised	arising 10:7	attract 60:13	84:7	
abuse 31:19	add 6:11 8:10	ago 26:18	79:12	82:20	attributed 56:12	believes 27:16	
abused 6:19	32:25	agree 94:8	anonymous	arithmetic 86:24	82:15	bend 36:19	
52:13	addition 80:13	agreeing 37:14	71:20	Armstrong	audio 87:8	best 25:12 31:20	
abuses 34:24	87:14	73:8	answer 13:22	73:25	Augean 26:16	82:9 93:1	
accept 26:12	additional 51:19	agreement 50:17	14:5 57:14	arrangement	August 69:4	better 10:1	
acceptable 39:20	81:9	68:25 82:16	anticipate 6:15	65:2	authority 82:2	beyond 5:18	
acceptance	Additionally	agreements 26:8	anyone's 29:20	arrangements	availability 21:8	26:13	
81:11	aided 90:21	aided 90:21	apart 28:23	65:20	available 7:13	big 43:16 82:18	
accepted 63:20	address 4:1	aired 24:22	59:20 79:7	arrest 14:1	avenues 18:6	bigger 13:12	
76:8 77:20	11:22 24:4	albeit 44:14	86:13 89:15	arrested 13:24	avoid 47:4	46:11,12,17,19	
81:5	35:5 48:12	Alexander 69:9	apartments	arrives 22:16	avoided 22:3	93:17	
accepting 38:12	54:5 66:24	69:12	38:20	arrogance 19:24	avoiding 80:6	bill 85:12	
access 35:23	92:9	alive 10:25 70:15	apologies 86:20	article 33:20	award 82:5	binnology 39:12	
36:14 39:4,10	addressed 91:5	allegation 6:10	apparent 25:16	34:15 35:15	aware 12:6	blag 51:18	
62:2 64:5,7,15	addresses 59:9	64:19	apparently	38:2 43:22	32:19	blagged 34:1	
65:16,21 66:16	59:15	allege 5:16 6:4	87:12	79:9 94:7	A's 68:14	blagging 33:23	
73:14 75:15,25	addressing 24:2	78:15	appear 28:23	articles 76:6,19		35:23 43:5	
78:21 80:15,21	72:5	alleged 24:9 64:2	79:17 81:16	76:22	B	49:25 66:20	
accessed 10:23	adduce 14:21	64:24 65:1	86:23 87:2	articulate 15:12	B 74:17,18 86:14	blaggings 87:15	
64:24 67:16	add-on 4:20	73:17 76:14,18	90:4	17:5	86:15,18,21	blame 93:12	
77:1	adequate 14:21	76:23 77:13	appeared 36:1	arts 29:15 35:14	back 11:2 71:22	blind 91:21	
accessing 73:11	adhere 4:13	allegedly 46:21	54:18	53:9 95:3	78:12 88:8	blood 62:5	
87:7	adjournment	alleges 78:2	appearing 21:17	ascertained	93:21	Bob 39:23	
accessory 50:24	95:17	Allen 54:25	21:20	47:22	background	body 14:22 45:21	
90:18	administrations	allow 57:4 93:5	appears 6:16	ascribes 36:10	21:5	book 39:22 53:8	
account 4:21	16:3	allowing 9:22	56:10 86:15	aside 43:13 48:5	bad 19:5 28:22	61:13	
25:7 28:5	administrative	allows 36:14	applaud 2:12,13	88:18 94:23	29:14 31:16	books 63:17 69:9	
31:18 36:18	8:12	alongside 7:22	6:24	asked 9:10 10:5	35:14 37:20	boost 26:22	
61:11 76:24	admissions	alternative 77:13	Applications	14:9 18:19	bailiwick 69:19	bore 35:21	
92:17	75:19,22,24	altogether 93:7	10:9	56:5 60:18	balance 1:19	borrowing 37:6	
accountability	76:7,11 77:23	amended 60:23	applied 16:10	84:24 90:5	72:17 82:15	37:13	
24:12	admitted 76:4	78:23	78:19	93:17	balanced 18:3,11	bottom 31:21	
accountable 26:4	77:4,9,16	amendments	applies 16:11	aspect 4:12 5:10	bank 54:13	56:22 59:23	
accounts 54:12	adopt 13:1	23:9	42:5 48:3 70:2	6:1 46:19	bar 16:11	83:3	
86:16,21	advance 25:3	American 93:20	apply 23:18 26:4	aspects 1:24 15:3	Barber 94:15	bounds 39:20	
accuracy 44:7	47:22	amount 9:24	30:20 58:1,15	aspiration 47:25	base 4:13 37:10	93:24	
achieve 9:25	advanced 18:1	33:15 41:21	72:15	assess 62:11	based 79:9 89:7	Boyall 53:15	
act 5:22 16:6	48:8 81:13	63:17 85:6	appointment	assessed 33:6	basic 65:12	54:17,24	
34:11,12 43:4	92:18	amounting 46:7	11:10	57:7 58:20	86:24 91:6	bracket 82:9,19	
43:22 45:8	advancing 27:11	analogue 45:1	appreciate 46:25	assessing 37:10	basis 13:16 50:24	branch 15:10	
49:4,10,13,14	85:1 92:5	analyse 11:18	61:23	assessment 89:7	67:25 69:22	69:16	
49:17,20 51:3	advantage 7:13	14:16 18:24	approach 3:17	assessments 57:9	76:11 78:16	Brandeis 93:20	
51:11 52:3,5	adverse 14:7	analysed 15:14	13:2 14:18	assessors 7:10,21	81:13,15 93:1	breach 12:5 38:2	
57:8,8,15	adversely 6:13	56:3 57:2	23:15 27:22	18:7	BBC 94:25	41:22 58:24	
58:25 60:23	22:15	67:18	72:10 88:11	assiduous 32:4	bear 2:4 14:9	64:25 78:14	
61:4,8 64:4	advertising 46:18	analyses 68:4	approached 2:21	assiduously 47:4	bearing 13:17	80:7 81:24	
72:16 90:11	advice 58:5 79:3	94:9	6:18 8:25	assist 85:23 95:9	73:7 80:8	89:6 90:22	
acting 34:16 66:7	81:21 82:13	analysis 2:11	appropriate 5:6	57:7 58:20	82:21	breaches 22:17	
68:21	84:11 85:8,15	15:20 21:13	6:18 8:25	assisting 7:18	beginning 63:6	42:25 43:3	
action 36:12 40:2	advise 82:2	24:25 25:20	10:11 18:4	associated 3:23	63:13 95:6	46:7 57:7,8	
77:4,10	84:25	74:7,8 85:24	30:2 51:10	54:9 74:5	begins 28:18	64:3	
actively 20:11	advised 79:5	86:1 88:7	April 76:14	associates 55:22	begun 88:2	breadth 11:16	
activities 6:25	81:21 85:5	Andrew 69:20	area 23:6 72:14	86:7	behalf 71:5	62:12 86:1	
	87:23	Andrew's 74:14	areas 8:14 14:14	Association	92:18	91:25 95:9	

break 8:22 52:22 52:25 95:12	careers 16:20	22:19 45:13	clash 23:15	57:19 58:16	concentric 24:8	9:23 21:13
breakdown 56:10,10	careful 15:21 90:7 91:1	47:2 59:23	25:16	76:10	concept 37:3	consensus 23:7
breaking 60:19	carefully 32:19 57:23	60:8 62:6	classic 61:12	Commissioner 43:10 49:5	concepts 11:18	consent 49:23 50:20
breaks 9:22	carried 28:10 53:21 68:3	70:20 71:19	clause 82:17	52:15 55:6,14	concern 4:22 6:11 16:18	consequences 7:8 11:3
bridge 61:25	cart 13:5 14:13	88:2 92:8 95:2	clean 22:8 28:12 85:12	Commissioner's 53:4,11,23	32:8 45:19 52:1	consequent 4:2
briefing 3:1	case 17:15 19:16 28:19 33:6	chairman 10:7	cleaned 26:17	57:3,14 60:12	concerned 2:15 41:6 49:17	consider 1:13 8:2 11:21 17:2
bring 4:17 49:11 60:4 61:15	carry 63:14 68:19	challenges 17:10 18:22	clear 1:12 4:6 7:25 9:2 10:2	61:21 80:18	50:8 53:18	23:8 28:25
71:23	carrying 34:25	chance 37:5	12:4,10 16:4	Commission's 54:1	55:9 56:1	42:9 46:9 47:5
bringing 40:23 70:12	cart 13:5 14:13	Chancery 75:3	34:15 42:19	commit 64:3	69:17,20,23,25	48:7,10 70:25
brings 4:4	case 17:15 19:16 59:15 67:16,25	change 23:8	47:23 53:10	committee 10:6 40:7 73:2,18	concerns 6:17 8:12 15:22,25	84:24 85:17
British 34:2	71:4,25 74:10	changed 2:4 61:9 66:14	57:7,17 60:18	79:1 83:1,2	17:3 23:23	92:4 93:17
Briton 31:13	74:14,15,16,18	changes 24:3	66:16 74:4,12	Committee's 40:11 73:22	conclude 21:24 24:20 32:25	considerable 3:9 9:24 14:3
broad 2:10 11:22	74:21 75:11,23	channels 66:14	78:24 88:14	common 38:10 42:12 46:6	79:14	15:13 25:8
broadcast 94:3	76:2 77:13	chapter 53:7,8	91:23	50:24 64:12	concluded 9:15	31:11 32:10
broader 11:20 24:3 43:20	78:5,11 80:20	characterised 88:23	clearly 19:24 20:25 24:7	77:13	conclusion 2:19 6:19 7:22 20:6	45:21 81:11
91:8	81:13,23 82:18	characterising 89:13	46:4 71:8,18	commonly 43:4	28:24 33:3	consideration 6:25 13:11
broadsheet 3:21 22:6 30:10	83:18,21 84:3	charge 41:12	client 55:24 69:21	commonplace 70:24	53:24 57:5	54:19 92:10
34:20	84:8,19,22	charged 55:1,22 59:12	clients 56:2 69:18	communicate 83:20	82:4	considered 3:14 4:5 8:8 31:2
broken 13:13 19:6,10	cases 26:11 39:13 58:7	check 1:24 44:7 44:8	client's 71:4	communicated 83:17	conclusions 62:14	82:7
brought 32:7 75:8 78:11	73:24,25 74:23	checking 91:19	Clifford 69:17	communications 9:4 38:18 45:6	conclusive 33:12	considering 38:11
84:2,18	90:25	checks 53:21 59:6,11,17	Clifford's 74:10	45:8,14 54:21	concrete 32:2	consistently 83:7
brush 2:10 22:12	cash 63:23 66:23 69:3 81:9	Chelsy 69:13	climate 70:23	communities 22:14	concurrent 13:16	conspiracy 55:2 64:18 68:2
BT 51:18 54:11	cast 16:16 34:13	chief 69:23 74:2	cling 10:24	community 30:17	condemn 27:22	75:13
buck 90:6	casual 21:9	chilling 25:24	Clive 62:22 68:1 68:8,11	company 32:13 43:7 50:10	conditional 26:8 55:4	conspirators 58:3
bud 16:1	catch 8:7	choice 26:11	close 15:19 62:4 72:2	63:2,3,4,12	condoned 19:22 84:5 91:15	conspired 64:3
bugged 38:19	catch-all 45:18 46:1	choose 23:18 32:19	code 23:1,5,9 30:24 36:10	65:12 66:4,6,6	conduct 2:16 9:5 13:18 21:1	constant 24:9 38:9 92:20
building 7:6	categories 38:11	chooses 15:6	cogent 33:18 87:24	66:11 69:1,6	22:21,23 23:2	constitute 21:12 46:10 57:7
burden 56:20 58:17	category 42:11 44:12 45:17	chord 27:7	coherent 33:13	70:13	33:15 37:21	constituted 34:10
Burden's 39:22	cater 29:22 30:11	chosen 8:20	coin 41:13	compasses 89:22	46:7 55:10	constitutional 14:4 16:6 31:5
burgeoning 26:2	caught 48:1 91:11	cinemas 38:18	collateral 48:15	compel 13:22	90:3	constrained 35:1
bushes 39:19	cause 68:15 77:10	circle 94:6	collectively 88:23	compelled 14:5	conducted 3:1 53:16 62:13	constraints 16:13 21:7
business 11:11 16:17 48:22,23	caused 35:18	circles 24:8	come 6:16 14:16 37:18 62:1	competing 25:2 28:14	Confessions 40:16	25:24,25 93:8
59:2 63:9	causes 31:21 34:23 77:4	circulation 26:23 27:8	comes 91:7	competitive 27:9	confidence 18:15 22:13 78:14	constructive 3:9
businesses 59:8	92:11,13 94:14	circumstances 32:17 33:10	coming 15:8 44:11	complacency 19:23	80:7 89:6	consulancy 63:12 68:25
by-products 48:14	causing 10:24	51:4,11	comment 5:13 25:21 35:3	complain 26:7	confidences 52:12	consultant 63:1 69:18,21
C	celebrities 28:2 46:3	citation 80:3 81:2	commentaries 30:21	complaint 12:8	confident 57:25	contain 61:4
C 74:17 86:14,15 86:21	celebrity 25:15 47:3 92:25	cite 35:15 79:21	commentators 29:5	complaints 37:7 46:6,10	confidential 35:23 50:22	contained 49:22 59:6 76:21
call 9:20 15:17 18:9 36:9	93:10	civil 35:2 72:16 73:16 75:1,5,8	commented 15:14	completely 57:24	52:11 53:12	82:16
67:19 95:12	celebrity's 93:7	78:11,17 89:4	commercial 25:8 27:10 41:19	complex 19:21 20:3 29:8 30:7	55:13 64:8	containing 67:4
called 2:25 24:14 54:25 63:11	censure 59:5	claim 12:3 14:10 76:12,14 77:5	commission 37:7 60:10	49:10	66:18 76:5	contains 61:17 94:12
68:12	Central 54:20	77:7,12,21	commissioned	compromise 61:12	confidentiality 82:17 84:17	Contempt 43:22
calling 1:6	centre 39:25 40:2	78:14 81:24		compulsion 5:21	confined 34:20 92:14 95:4	content 29:18
callousness 11:5	certain 30:19 35:21 48:13	claimant 81:23		computer 32:16 44:13,16,19	confines 35:2	contents 67:7 83:16,20
calls 5:20 64:17 66:24 87:4	79:13 80:23	claims 69:6,7 75:8,24 76:3		50:11 53:19	confirmed 34:4 53:13	context 7:2 25:18 45:9 58:7 65:8
cameras 38:20	83:18 84:22	77:25 78:1,17		54:14	confiscation 81:8	74:6,8,13 89:4
campaign 76:17	certainly 6:24 13:7 16:22	89:5,6 91:20		concentrating 38:6	connect 33:24	continue 3:12 14:9 16:14
capable 16:9 42:11 62:15					conscious 8:9	

30:15 79:25 continued 88:5 contours 46:16 contract 63:4,10 63:14 73:5 78:22 81:6 contracted 63:19 contrary 26:19 89:12 contributed 20:16 contributors 29:17 control 15:13 controller 49:24 50:4,5,8,21 controllers 49:15 52:11 controversial 39:15 controversially 23:2 40:14 convenience 23:21 convenient 52:20 Convention 43:23 convergent 42:7 conversely 15:23 conviction 61:1 convince 66:6 core 4:25 5:11 6:2 8:1,1 18:6 30:12 94:11 corner 67:23 68:7,11 74:9 74:14,15,16,17 74:18,20,22 78:5,9 86:10 86:14,23 88:15 89:18 corners 92:22 Cornwall 53:17 corporate 31:20 90:10,14 91:7 91:19 correctly 84:13 corresponding 69:5 corroborated 42:6 corrupt 50:13 54:18 corruption 41:7 53:24 54:3 66:20 cost 8:9 26:9 costs 82:16 84:16 cottage 88:25 Council 10:8 counsel 7:20,22 8:2 17:13,14 67:8 69:10 71:5 77:3,20 79:3,5 80:6 counseled 90:21 counseling 77:14	counsel's 81:17 count 69:17,20 69:23,25 70:2 73:13 counterweight 94:9 countries 31:14 country 31:10 counts 64:2,23 65:5,8,14 66:21 67:7,17 67:24 68:7,10 69:16 70:11 71:12 74:6,14 75:6 86:12 courage 17:1 course 9:12 18:2 23:8 24:22 28:25 29:10 42:21 43:8 46:14 47:25 53:20 55:2,15 59:18 60:20 73:10 85:5 89:19 92:4 court 26:3,6 27:22 32:9 33:9 43:22 47:3 51:9 77:6 81:6 82:5 courts 30:13 36:9 cover 12:24 20:19 43:12 90:10 coverage 6:16 covered 38:22 63:23 85:2 covering 34:22 63:13 covers 63:5 covert 35:6 38:18 cover-up 20:21 83:13 85:21 92:7 co-conspirators 71:20,23 co-operation 5:25 CPS 33:5 55:1 credibility 66:12 credit 54:13 credulous 29:24 cricketers 40:24 criminal 11:24 12:3 13:15 33:9,15 43:15 47:17 49:18,20 52:2 54:23 57:21 58:3,23 59:16,16 60:11 61:3 63:20,25 65:3 70:4 71:25 72:6,25 78:13 89:2 90:13,17,18,25	91:3,4,9 critical 1:21 2:4 7:1 32:6 46:16 51:19 criticise 2:12,13 criticising 85:14 criticism 7:1 cross 16:2 crossfire 16:15 culminated 62:19 culminating 10:19 70:5 cult 92:25 93:10 cultural 19:14 20:14,22 22:5 91:24 93:15 culture 2:6 6:20 11:17 14:24 15:4 16:21 18:11 19:1,12 19:20 20:9,11 21:1,25 23:10 27:11 40:7 61:20 62:15 73:1 78:25 80:20 82:22 83:6,11,12,23 85:20 92:7 95:9 cultures 13:13 21:22 62:15 cunning 36:20 curb 31:19 current 2:9 23:5 customer 66:2 66:13 customers 59:5 cut 61:2 92:22 cutting 32:3 cynicism 11:5 cypher 74:12 cyphered 57:16 68:13 cyphers 86:11	50:21 52:2,5 52:10,11 53:18 54:2,10 57:7 58:24 60:23 61:8 66:18 67:19 90:11 database 39:4 84:24,25 date 1:7 61:16 dated 40:7 76:14 Davies 53:8 day 7:11,11 8:6 10:10,11 22:15 22:15 days 3:7 9:21 11:7,9 29:18 44:25 deal 1:10 6:23 7:3 21:16 54:15 55:7 75:21 76:12 dealing 24:8 55:15 dealings 4:8 deals 32:21 dealt 71:12 debatable 71:18 83:4 85:17 debate 3:9 28:21 91:8 deceive 35:22 deceived 36:7 December 10:4,4 decency 93:24 decent 25:11 deception 35:7 50:1,12 deceptive 39:3 decide 29:1,6 36:9 decided 23:21 deciding 27:18 decision 19:18 60:4 83:19 decorum 8:17 dedicated 59:3 deduced 44:5 deeply 82:13 defamation 35:2 default 66:4 67:13 defence 34:14 35:4 36:16 51:2 57:25 58:5,6,13,18 61:7 71:5 89:1 89:5,20,21 defences 49:21 defendant 72:8 defensible 26:11 deferred 2:18 define 42:12 defined 28:1 71:8 defining 90:7 definite 57:4 definition 22:18	degree 44:17 delayed 9:16 deleted 10:24 11:1 deliberate 19:17 deliberately 2:18 21:15 delivery 63:21 delving 23:14 28:1 demanding 11:14 15:8 demise 10:19 democracy 1:15 31:7,23 democratic 24:11,11 democratically 26:4 denial 83:12 92:8 denied 74:4 78:18 department 66:3 departure 62:17 depend 23:18 34:11 depends 29:7,8 deploy 42:20 70:6 deployed 25:18 27:25 45:20 89:8 deploying 27:13 depth 62:13 86:1 95:9 deputy 60:3 derived 88:6 derives 19:20 descend 2:11 described 69:8 89:14 92:22 describing 29:10 45:25 48:9 desert 48:19 design 77:14 designated 8:15 designed 23:1 49:11 desire 1:19 destination 31:12 detail 6:10 23:12 23:14 34:8 55:8,17 detailed 2:11 13:10,15 15:6 49:8 53:6 detailing 55:20 details 34:3 35:24 54:23 59:7 67:4 94:3 detect 44:18 detective 53:16 54:7 detectives 41:6 42:10,17 determinations	72:15 determined 72:10 determining 33:8 deterrent 71:3 developed 31:10 75:11 device 32:16 38:18 devices 45:2 devise 18:13,19 devised 5:5 18:18 devolved 16:3 Devon 53:17 dialled 59:7 diaries 39:13 died 36:21 differ 47:1 65:20 difference 90:12 differences 22:5 different 4:3 20:22 21:22,23 21:23 22:10 29:22 41:24 42:11,17 44:14 44:23 56:4,13 56:21 83:22 95:10 differently 56:6 63:24 difficult 20:8 45:12 47:14 52:6 62:9 digital 45:13 diminished 93:9 direct 27:4 directed 72:7 86:7 direction 1:8 8:19 23:20 93:23 directions 3:19 9:3 directives 49:12 directly 37:6 41:6 89:22 disadvantage 26:9 disaster 35:19 discerned 46:17 discharge 16:14 31:24 55:4 discharging 11:12 disciplinary 84:6 disclose 49:21 disclosed 58:11 78:24 79:14 81:10 discloses 50:19 disclosing 51:5 disclosure 78:20 79:23 84:8 discourtesy 8:9 discovering 37:5	discuss 4:16 37:1 discussion 5:8 dished 48:1 disk 32:16 dismissal 84:2,12 84:13 disparate 46:5 disposal 51:23 dispute 77:17 93:17 disputed 79:12 distinction 37:23 47:3 distortion 38:3 divide 23:22 Division 75:3 DNA 93:15 document 73:10 88:4 documentary 78:8 documentation 54:8,15 55:15 78:21 79:7 documents 32:9 53:20 70:22 78:24 82:25 doing 3:25 15:18 22:7 28:6,15 48:12 84:5 85:25 domain 28:3 38:23 39:9 40:16 42:15,19 72:25 79:7 83:1 87:1 88:13 93:8 domestic 49:11 94:6 Doncaster 34:1 34:17 doubt 5:24 10:16 11:23 16:20 37:3 75:4 81:11,12 95:8 doubtless 6:6 33:10 89:7 Dowler 88:3 Dowler's 10:23 dozen 75:24 Draconian 26:1 draft 79:9 draw 6:18 20:8 20:19 87:24 92:3 drawn 7:23 14:8 17:23 37:23 52:17 62:16 68:17 83:19,22 86:1 88:9 90:25 draws 60:17 drew 79:13 driving 50:9 drown 17:8 drug 32:12 due 18:2 42:21
---	--	---	---	--	--	---

55:2 59:18 60:20 75:2 78:1 85:5 dung 26:18 28:13 dust 51:24 dustbins 39:11 duties 10:7 duty 17:15 48:18 89:24 duty-bound 37:19 DVLA 53:22 54:12 dwelt 51:13 dysfunctional 19:7,11	embarking 11:10 51:22 embracing 11:23 emerged 24:25 51:20 56:3 79:1 emergency 8:21 emerging 75:1 emotive 43:21 emphasise 9:16 13:20 14:12 88:12 emphasised 72:6 employed 63:1 81:14 employee 50:4 50:14 59:25 70:8 79:11 employees 70:12 74:24 75:14 85:4 88:16 employers 16:19 employment 84:3,18 en 31:12 enable 14:22 62:11 enabled 45:2 enables 91:25 enacted 49:7 enactment 49:9 encapsulate 30:6 encapsulated 37:16 encapsulation 94:12 encourage 3:15 4:25 29:25 encouraged 4:14 16:25 encourages 93:3 endeavour 12:21 23:12 62:3 endemic 20:7 endorse 5:7 ends 28:1 37:24 41:1 enforceable 34:12 engage 5:3 36:19 81:14 England 16:5 enhanced 82:3 enhances 41:19 enjoy 18:15 93:13 enjoyed 16:2 enormous 8:9 enquiries 13:9 ensure 14:21 17:7,25 49:15 ensuring 1:21 entails 42:23 enter 33:4 entered 61:13 72:24 82:11 entering 14:14	entertain 30:14 48:18 89:25 entertaining 30:7 47:13 entertainment 29:21 entertains 25:6 entirely 12:20 17:16 27:20 60:9 66:16 entitled 12:19 29:23 43:23 53:9 entity 43:7 49:23 63:11 entrust 52:10 environment 27:10 epicentre 35:11 equation 33:5 equipment 9:7 equipped 65:12 equivalent 58:15 76:17 errant 17:21 escape 59:5 espouses 31:21 espousing 34:23 essential 1:23 31:23 34:25 36:22 50:6 essentially 53:10 75:13 establish 18:10 33:16 94:20,23 established 12:16 67:18 72:21 ethical 3:18 4:13 12:5 22:17 38:4 71:7 93:8 ethics 2:6 6:21 11:17 14:24 15:4 16:21 18:12 19:1 21:2 22:20 23:11 27:12 90:15 91:7 ethos 20:15 91:19 EU 49:12 European 31:14 43:23 evaluating 90:8 event 48:9 58:17 89:3 92:17 events 10:18 31:11 82:21 84:11 eventually 34:4 everybody 31:25 evidence 2:23,24 3:25 5:15,20 6:8,20 7:12,14 9:15,19 10:5 12:11 13:11 14:22 16:21,22	18:1,9 20:18 20:20 21:4 28:18 30:18 31:1,3 34:22 37:10,19 38:1 38:16,22,24 39:17 40:11,15 40:22 41:3 42:7 44:15,19 45:15,21,24 46:5,11,16 50:21 51:14,15 53:6 55:8 56:14 59:25 60:7,10 61:1 61:17 62:4 63:23 64:16,22 67:15,17,22 68:2 69:2 71:24 72:23,24 75:1 78:8 80:10 83:2 85:1,20 86:4 87:19,22 88:13 88:20 90:8,23 91:23 95:5,7 evidence-based 30:23 evident 8:18 evidential 78:4 evolution 19:23 exact 63:19 exactly 47:1 examination 13:10,16 20:2 62:4 examine 35:12 52:16 65:5 examined 57:23 examining 46:22 46:22 example 12:7 33:18 34:20 38:21 39:1,15 40:6 43:8 44:6 51:14 72:25 examples 12:12 31:15,16 32:2 34:19 38:13 39:6,9,11,21 excavating 75:16 exceptionally 24:14 excess 82:18 exchange 63:21 exchanges 60:17 excite 52:3 exclude 26:15 excluded 92:17 exclusive 73:6 93:2 executive 31:20 69:24 executives 84:4 executors 82:23 exemplary 81:25 exemplify 21:1	exercise 5:23 7:15 27:21 52:20 62:9,13 68:5 exercised 1:16 exercises 12:17 exist 37:11 84:10 89:2 93:6 existed 21:25 25:10 72:22 existence 13:13 19:10,12,19 20:16 53:12 61:20 79:8 92:12 93:12 existing 26:1 exists 93:5 expand 59:19 expanded 37:4 expansive 9:20 expect 8:6,17 12:19 expectations 12:15,20 expected 8:22 expedition 37:3 47:21 51:22 58:9 expeditions 36:25 expenses 32:14 39:16 69:6 91:19 expensive 45:13 experience 4:2 experienced 42:3 experiences 6:6 6:8 expertise 7:19 explain 14:16 19:12 explained 67:7 69:10 explaining 15:7 22:20 explains 58:6 explanations 72:4 explicit 17:14 exploit 26:21 exploited 26:8 explore 18:6 41:2 explored 59:24 exponents 25:22 28:21 expose 25:19 35:17 89:25 exposed 32:14 62:5 exposing 36:11 48:16 expound 28:15 express 30:1 expressed 6:12 17:22 89:4 expressing 48:24	expression 1:13 6:14 48:17 expressly 21:10 30:13 extension 8:16 48:22 extent 2:8 17:21 22:21 28:16 31:25 44:4 60:1 61:19 80:9,14 82:22 83:3 91:16 extra 67:22 extract 43:6 extracting 35:24 extraordinarily 15:11 extraordinary 10:18 extremely 12:22 21:3 33:18 62:22 80:25 82:7 ex-directory 54:22 59:6 eye 91:22	87:24 fare 48:21 fate 55:10 favour 17:6 43:24 fear 15:18,23 16:19 21:17 fearful 16:18 feature 56:24 70:25 featured 48:4 features 82:4 February 40:8 55:1 73:2,2,15 78:21 fee 26:8 feel 3:16 8:3 22:11 felt 21:10 71:24 72:1 Fergie 69:12 fifth 44:12 76:13 figure 47:2 84:15 84:20 87:3 figures 26:23 46:25 56:24 86:24 filled 94:5 finally 3:19 9:9 23:2 26:12 67:13 76:23 financial 21:6 34:5 35:17 56:25 94:16 find 72:7 91:11 finding 36:25 51:24 65:25 86:8 findings 24:5 72:11 fine 23:12 36:3 60:25 fire 60:18 firm 84:23 first 1:17 2:21 7:9 11:15 13:20 16:17 19:13 25:3 38:16 49:7 53:23 58:3 59:1,25 60:16 63:1,4 66:10 67:23,25 72:24 74:23,24 78:13 79:22 88:3 90:12 Firth 39:23 fish 47:21,25 fishing 36:24 37:3 47:21 51:22 58:9 fit 16:13 five 64:25 65:7 85:3 fixed 66:25 Flat 53:8 flouting 59:4
E	E 71:9 Eady 40:3 Eady's 81:22 earlier 94:16 early 10:4 24:23 Earth 53:8 easy 32:2 Echo 3:22 edge 32:3 editor 2:13 26:25 27:2 33:19 36:4 44:6 48:19 62:23 65:10 68:23 73:4 94:15 editorial 2:13 editors 4:14 27:20 30:24 educates 25:5 effect 38:2 61:15 effective 35:4 efficient 9:18 effort 5:23 effrontery 94:2 egregious 31:16 38:3 Eightly 83:25 eight-month 64:1 either 2:22 20:13 21:2 22:19 28:16 59:13 74:10 83:16,22 89:6 91:13,23 electoral 59:11 electronic 32:16 38:17 39:2,4 elements 21:12 Elle 70:3 74:18 elusive 29:12 email 40:5,9,12 44:13,16,19 73:20 74:4 76:24 78:22 emails 84:7,9,21 85:3,6 emanate 19:15 emanates 88:4	E	E	E	E	E
F	F	F	F	F	F	F

flow 19:6	Friday 10:3	83:2 86:11	grounds 12:9	Harry 69:13,13	93:13,14	impersonate
focus 15:5 22:13	friends 10:24	87:3 92:10,15	37:9,10,11	69:13	hunt 25:19	36:20
24:17	fruits 64:20	gives 41:2 57:24	90:3	Harvard 93:21	hypocrisy 25:17	impersonation
FOI 57:6	frustrated 55:7	83:10 87:16	groups 4:25 5:1	health 85:13	48:16 89:25	43:5
followed 5:11	FT 94:25	92:13	21:23	hear 5:15 7:12	hypocritical 28:5	implicated 43:15
73:23 84:14	full 24:11 34:15	giving 55:8 71:3	grubby 89:16	7:16 16:24	28:7	implication
94:24	59:11	82:8	GT 73:24	38:23 42:21	hypothesis 83:23	85:13
following 5:21	fuller 56:10	Glenn 40:9 62:24	Guardian 32:5	53:7 56:14	<hr/>	impliedly 21:10
10:17 38:11	fully 1:13 13:20	75:25	56:24 94:24	60:20 87:21	I	importance 25:9
46:20 49:9	40:16	go 9:24 48:7 82:1	guardians 2:2	89:11	ICO 53:14 54:4	31:6,17
56:3 75:22	full-time 87:18	goes 30:3	4:20	heard 10:9 78:1	60:1	important 7:18
90:19	functioning	going 5:18 17:17	guarding 4:19	hearing 7:4,21	iconic 10:19	11:11 21:3,12
follows 53:3	31:23	22:18,19 29:14	guards 2:2	8:13,15 28:17	ideal 13:6	22:25 31:19
footballers 69:22	functions 12:17	44:20 68:12	guess 82:9	37:17 38:16	ideas 4:17,17	51:21 52:9,16
69:24	16:15 31:24	90:9 91:14	guesswork 90:24	46:1 62:20	30:7	91:5 94:18
footing 50:25	fundamental	gold 51:24	guilt 72:8	70:5 75:9	identifiable 87:1	importantly 44:4
foot-slogging	1:14,15 2:3	good 1:4 4:20	guilty 27:21	hearings 3:20	87:12	imprisonment
59:10	4:18	7:11 9:16 10:2	50:18,23 55:3	4:16 9:3	identified 3:19	60:25
force 25:5 33:21	further 6:7 7:19	11:23 16:21	62:19 72:8	hearsay 40:10	18:15 56:12	improper 2:16
49:9 61:14	9:9 16:16	25:5 28:22	73:15	heart 2:1	58:10 86:6	38:7 44:10,11
forces 19:21 20:3	22:18 26:7,18	29:16 30:10	<hr/>	heartland 47:8	identify 1:8	45:17,17 46:21
forefront 9:17	30:3 44:23	31:16 32:3	H	held 3:7 80:23	41:10 72:18	inaccurate 3:5
32:7	47:7 49:8	33:18,21 34:16	h 69:8 71:15	helpful 19:2	91:6	30:24 46:8
forensic 13:10,15	51:18 59:21	34:22,23 37:17	hack 72:20	helping 18:13	identities 57:12	incentive 41:18
59:20 62:4	60:2 68:2,4,6	51:15 64:11	hacked 76:24	hidden 38:19,20	57:15	include 44:12
foreshadowed	77:18,23 85:20	95:11	78:2	39:19	identity 68:14,14	66:19
59:21	85:23 90:9	Goodman 62:22	hacking 4:22	hidebound 25:23	69:7	included 1:18
forgotten 12:16	93:5	64:3,16 65:2	5:18 12:1,5,7	high 10:20 17:20	id 93:25 94:5	45:24
Fork 91:12	Furthermore	66:24 68:18,21	12:12 23:14	19:15 26:3,5	ignored 44:6	includes 49:24
form 24:6 25:10	15:3 42:3	68:22 69:5	26:13 32:4	26:10 27:22	ignoring 46:15	52:11
38:9 41:19	51:25 64:18	70:19 71:5,6	37:2 38:25	29:20 59:15	88:15	including 2:6
44:22 47:10	future 4:4 18:22	71:13 83:8,25	44:12,13,16,19	72:6 83:17,21	illegal 5:17 12:2	5:18 25:6 37:9
56:11 61:18	<hr/>	84:5 85:1,7,19	44:21 45:16,25	90:5	12:13 20:16,25	41:14 42:13
63:1 64:21	G	86:13 88:14	47:17,18 48:5	higher 31:5	22:22,23,24	54:11 69:22
75:16 92:23	Gaddafi 34:6	Goodman's 68:1	62:1 77:15	highest 25:13	23:4 27:13	78:21
93:1	35:18 51:13	69:19 84:3,21	86:7 88:2 95:2	29:19 30:13	37:20 39:1,7	inclusive 84:16
formal 1:5 5:9	Gaddafi's 33:24	92:18	95:4,7	highly 17:5 26:5	44:14 45:7	increase 27:8
63:4	gain 39:4,10 64:5	Goodman-Mul...	hallmarks 35:21	high-handed	55:18 57:18,18	60:24
former 53:19	65:15,21	48:4 62:18	Hampshire 54:6	89:17	62:12 79:18	Increased 21:5
59:25 90:16	gained 64:15	goods 33:2	Hampstead	hinterland 47:10	80:11,20 81:15	increasingly
forms 39:13	75:25	Gordon 69:23	48:20	historical 19:21	88:17,21 89:15	27:9
forthcoming	gaining 64:7	73:7,14,24	hand 20:12,24	94:9	89:19 91:15	incrementally
5:25 31:2 84:9	gather 36:5	74:15 78:10	24:16 68:7	hits 52:13	92:14	31:10
fortnight 9:21	gathering 33:14	gossip 47:12	handed 54:24	HMRC 50:9	illegality 89:7	incriminate
forward 4:17 5:4	37:25	93:24 94:5	handle 43:18	hold 23:3 36:18	91:25	13:23
28:14	general 14:19,22	govern 72:17	handling 33:2	49:16	illegally 80:15	inculpated 88:19
found 26:18 57:3	15:6 26:20	governance	hand-held 9:6	holding 2:18	illegible 74:17	incur 6:7
63:10 64:20	41:18	90:14 91:7	hapless 35:25	28:5,6 49:23	illegible 88:15	independence
67:4 77:10	generally 6:1	government 1:22	happen 1:9	holds 25:6 31:18	illegitimate	16:7
four 24:2 34:19	9:22 10:9 25:4	16:6,8,10 25:7	74:24	home 52:14	63:22	independent
55:1,2,10 58:3	35:9	41:15	happened 1:7	66:24	illicit 66:9,19	16:8,11 56:25
fourth 15:8	generated 3:7	granting 17:2	26:17	honestly 12:25	illuminating	94:25
75:18	generic 19:9	grasp 52:6	happening 5:8	hope 6:3 7:4	61:2	independently
Fourthly 40:14	91:24	grateful 5:19	happens 12:6	10:24 36:25	imagine 80:25	68:21
framework 2:9	geneticist 93:14	great 6:23 25:5	29:9 40:4	hopes 11:4	89:11	indicate 59:16
3:3,4 91:22	gilded 48:20	36:21 93:20	66:17	hoping 89:9	immediate 10:21	95:7
frankly 11:24	give 6:8 8:19	greater 25:11	happily 93:16	horse 13:6 14:13	18:22 21:8	indication 69:14
free 1:20 16:8,11	10:5 32:2	44:16	happy 9:5 32:1	hour 52:22	40:4 61:13	indictment 48:4
31:6,8,9,15,17	37:18 38:13	Greg 73:4	41:16	household 47:19	immediately	61:1 64:2,11
41:12 48:14	50:5,15 66:12	gross 12:5 38:2	harassment 46:7	64:7 67:11	58:14	64:23 70:11
freedom 1:13,14	68:6 70:25	62:20 67:8,25	76:17	68:10,24 81:10	immensely 52:9	75:7 86:12
1:16 6:14	83:6 85:12	69:2,11 70:5	Harbottle 84:23	housekeeping	Immigration	individual 1:20
48:17 57:15	given 10:11	70:10,14 71:2	85:2,5,10	1:3,11	61:4	11:1 30:11
94:10	13:11 23:18	71:10,17,19	hard 39:14 52:21	Hughes 69:25	imminently 62:7	36:13 43:17
freedoms 4:18	38:25 39:6,21	89:14,16 92:19	90:23	74:16	impact 6:8 21:7	58:17 60:5
freelance 21:9	53:6 55:21	ground 12:24	harder 44:17	human 22:25	imperative 48:11	67:10 77:10
frequently 59:7	58:8 60:7 68:1	21:15 34:16	harm 30:19	23:5 41:11,13	72:1	78:7 86:5

individuals 4:9 11:1 13:25 14:3,5 45:22 46:2,24,24 48:3 55:10 64:25 65:7 72:19 75:8 79:15 80:16 87:13 88:19 89:18	infrequently 86:23 ingredients 50:6 inhabit 13:7 24:21 inherently 41:21 initially 61:4 78:18 innocuous 60:9 inquire 18:25 Inquiries 9:15 80:11 Inquiry 1:5,19 2:1,5 3:6,14 5:9 6:1 7:20 8:10 9:5 10:6 10:14,17,22 11:8,14,16 12:11,16 13:8 13:22 14:9,14 14:20 15:1,7 15:22,23 16:2 16:4,12,14,17 16:20,23 17:1 17:4,7,13 18:2 20:1 21:24 22:4 23:20,22 24:22 28:18,24 29:20 30:18 31:4 32:20 34:21 35:11 37:9,24 38:25 40:14,18 42:9 42:21 43:16 44:2,15 45:20 46:1,9,14,15 47:5,13 48:7 49:2 52:16 53:6 55:9,11 56:1 60:8,16 61:2,19 62:11 67:6 75:19 83:3 85:16,23 87:19 88:10 89:11 91:9,10 93:16 94:7,11 95:6	institution 20:5 institutional 20:18 institutions 15:12 19:14 42:13 instructed 68:19 instructing 80:5 instructions 28:11 instrument 61:14 instrumental 40:23 insufficient 71:25 insult 22:19 insurmountable 17:12 intellectual 32:23 52:7 intelligence 42:2 intend 1:8 6:25 intended 85:12 87:13 intercept 45:13 intercepted 45:5 87:12 interception 38:17 44:24 45:7 67:5 68:20 interceptions 76:16 interest 4:24 12:4,9 13:17 25:14 27:19,24 30:22 33:4,7 33:17 34:14 35:3,8,10 36:10,15 38:15 43:24 44:2 45:11 46:23 47:10 48:8,16 48:17 49:2 50:3 51:6,12 51:15 52:4 55:11 57:25 58:4,9,13 60:14 61:7 65:9 67:6 79:23 83:5 89:1,20 94:13	internal 84:6,21 internally 44:4 79:2 international 2:16 3:24 28:11 40:3 65:4,11 67:1 69:1 71:13 72:19 74:25 75:18,23 76:4 76:8 77:8,15 77:22 78:3,12 78:18 79:2,11 79:15 82:11,23 83:7,24 84:4 84:10,11,23 85:9,12,14 88:2,16 89:9 90:6,21 91:11 92:15,16 International's 69:8 74:2 76:22 77:2 82:13 91:16 Internet 7:6,7 18:7,23 21:8 interpreted 17:11 37:14 41:8 48:24 intervention 61:10 intimately 79:17 intractable 48:25 introducing 61:7 introduction 70:1 intrusion 5:17 6:5 38:17 39:2 39:3,18 94:6 intrusive 47:14 47:15 intuition 21:22 inures 26:9 invasion 27:19 76:15 78:15 80:7 investigate 12:14 23:10 investigating 15:10,11 34:24 63:10 68:3 investigation 2:19 13:14 14:1,15,21 15:5 23:15 51:25 54:2,5 68:16 84:22 85:2 investigations 35:20 53:25 investigative 33:21 35:6 36:17 47:8,19 investigator 28:10 42:20 43:11,19 50:8	62:24 investigators 42:10,17 58:14 Investigatory 64:4 investment 12:19 invite 3:12 invited 2:22 inviting 59:18 invoices 43:18 44:3 55:19 invoked 14:8 involved 2:22 4:9 56:14 57:13 79:17 89:22 95:3 involvement 55:11 80:10 involving 31:13 iron 34:14 irreverent 29:24 ish 26:25 isolated 19:4 59:2 issue 12:12 14:13 21:18 30:25 32:22 33:11 35:5,12,13 37:2,16 49:4 52:2,6,9 61:2 62:1 72:5 82:22,22,25 83:4,25 85:16 92:8 94:19,21 issued 75:21 issues 3:18 4:16 16:16 21:11 22:10 24:21,25 30:25 41:7,11 41:18 42:16 43:21 59:20,21 61:18 84:19 95:9 items 56:6	36:23 42:8 50:21,23 51:18 51:22 56:1 58:18 journalistic 33:19 37:17,20 47:14 journalists 3:15 5:2 16:18 22:11 25:11 27:12 30:5 36:10,14 42:5 43:14,23 49:14 56:5,7,8,13,16 56:17,18,20 57:12,17,19,22 58:16,21 60:5 60:9 77:15 80:10,14 93:3 Jude 77:24 judge 26:6 90:2 judges 26:3 27:23 30:13 49:3 judging 36:4 judgment 7:15 23:19 48:25 81:22 judgments 22:7 judiciary 16:7,8 July 1:17 10:17 16:1 63:13 76:18,18 junction 45:25 June 64:1 73:15 73:19 74:1 79:6 83:9 87:23 junior 80:5 juries 72:7 90:25 jurists 93:20 justice 1:4 10:5 28:15 40:3,24 52:19 61:3 62:20 67:8,25 69:2,11 70:5 70:10,14 71:2 71:10,17,19 77:3,19 81:22 86:18 87:10 89:14,16 92:19 94:21 95:11,14 justification 6:18 37:7 51:15 justifications 48:8 justified 4:23 12:3,9 17:3 33:16 35:8,9 35:10 36:3 38:14 45:10 51:5,11 89:21 justify 27:19 41:1 47:14 48:7 80:1	keen 3:15 15:17 26:15 44:2 keep 17:17,20 49:1 83:13 key 11:11 24:24 36:16 61:18 66:9 King 55:1 Kingdom 31:9 knew 32:10 58:23 73:13 82:23 84:4 85:7 91:13 know 24:21 36:7 39:9 42:4 68:22,23 70:21 74:20,21 88:7 89:2,18 90:1 knowing 51:1 knowledge 13:24 40:12 55:18 74:4 known 29:15 32:11,15 43:4 44:5 87:22 92:15 knows 7:4 10:16 26:25 know-how 44:17
L						lack 4:2 laid 61:15 landline 65:22 landlines 66:22 landmark 31:11 language 89:16 large 2:21 8:14 34:21 late 45:11 53:14 61:10 launched 53:25 law 10:9 12:3 14:3 26:1,3 27:17 35:1,2 36:13 43:1 49:11,18 50:24 59:3 60:19 61:14 78:2 90:13,17 91:3 93:21 lawful 44:9 59:8 lawfully 49:23 59:10,14 laws 26:2 lawyer 52:7 91:4 lawyers 26:9 78:19 Law's 77:24 lazy 92:23 lead 2:12 42:2 94:24 leader 30:10 35:19 leading 19:22,23 77:2 79:3 lecture 91:3

94:16	92:19	making 4:6 30:3	mechanics 7:3	61:19 80:8	move 8:23	20:2 23:11
led 54:5 61:11	lines 7:19 18:5	47:7 91:22	media 1:25 2:17	Mine 34:5	moved 1:4	34:8 41:17
79:14 92:21	26:20 30:19	malicious 41:21	4:25 5:1,1	minimalist 76:11	moves 47:8	68:15 77:9
ledgers 55:19	71:7 75:25	management	29:22 40:7	77:23	moving 95:10	79:20
left 13:1 31:22	77:19 84:22	69:21 91:13	73:1 78:25	minimum 9:20	MP 69:25	need 1:10 14:19
68:7	link 66:25 67:20	manifestation	meet 4:15 12:21	Minister 9:10	MPs 32:14 39:15	18:20 30:14
left-hand 67:23	70:7	20:22	27:1	11:8 61:11	Mulcaire 40:9	35:5,11 41:2
legal 3:3 7:18	linked 51:16	manner 18:3	member 48:6	minority 87:6	62:24 63:14,19	42:6,9 46:9,15
13:21 16:13	53:21	manufacture	52:8 67:10	minutes 11:18	64:3,14,24	48:7,10 57:22
25:24,25 77:8	Lionel 94:15	26:2	members 30:17	52:23	65:3 66:1,8,16	58:10 65:5,18
82:15 84:16	lip 31:7	March 54:4	47:18 64:6	Mirror 3:24	66:21 68:4,19	69:16 70:9
legality 32:21	list 56:15,22 57:1	55:16 61:24	68:9,24 81:9	56:16 78:9	69:2,7 70:7	72:21 73:11
legible 86:10	75:19	margins 4:5	men 54:7 55:1,2	mirrors 38:20	72:20 73:3,5,9	77:17 85:16
legislation 49:7	listed 49:21	Mark 87:18	64:13	misbehaviour	73:11,14,20	92:9,10
49:11	listen 45:3	market 22:6	menage 47:12	38:12	74:7 75:7,14	needed 61:15
legislations	listening 38:18	55:18	mention 8:12	misconduct	75:25 76:9	66:5
61:12	litigation 26:10	marquee 7:5	10:3 59:22	61:20	78:6,12 81:4	needs 16:23
legislative 61:12	31:12 32:12	8:14,16,18 9:1	81:3	misdeemeanour	81:14,19 84:1	23:20 52:16
legitimate 4:21	77:22 79:4	Marshall 54:20	mentioned 21:11	36:11	84:18 85:19,24	70:1 83:3 90:7
25:21,25 50:3	little 28:16 81:12	Marxist 35:19	30:16 35:16	misdeemeanours	86:3 87:8,15	91:2
51:17 63:22	82:1	mass 46:16	45:10 60:3	20:19,21	87:17 88:7	negotiations
81:7,20	live 7:5 9:4	material 2:24	65:7 66:18	Miskiw 73:4,13	Mulcaire's 63:4	82:12,24 84:14
legitimately 66:7	lived 71:6	3:13 37:13	68:25 74:13	misled 36:12	63:12 65:14	neither 4:20 20:1
87:6	lives 27:16 46:23	38:5 65:11	79:8 92:7	misuse 53:18	66:14 67:3	23:4 29:1
length 91:24	48:2	78:23 79:14	93:10	78:14	69:1 70:6,10	Nelsonian 91:21
lengthy 88:21	local 22:14	80:14 87:2,25	merely 8:16 16:7	mitigating 71:4	70:20 79:18	network 44:25
lenses 38:21	locate 42:14	88:10	20:12 92:6	mitigation 92:18	85:7 86:14	54:18 67:14
lenses 38:21	located 12:1	materials 53:9	message 73:24	mobile 43:7	mundane 38:21	networks 65:21
lessons 52:17	50:14 66:22	matrix 78:5	messages 11:2	44:25 45:3		neutral 17:16
letter 71:9,15	location 8:13	matter 8:12	64:6,8 65:16	50:9 62:2	N	neutrally 72:5
level 23:17 82:5	logical 83:16	12:23 14:15	73:23 77:1	65:17,21 66:3	name 21:11	never 12:2 35:20
83:17,21 85:18	91:13	20:10 24:19	87:11,11,14	66:11,18 67:11	67:10,23 68:1	36:1 40:12
LEVESON 1:4	logically 42:2	25:20 29:13,21	Met 10:20	76:25	68:1 70:10	57:21 84:9
52:19 86:18	long 28:23 53:11	30:2,4 31:4	metaphorical	modes 39:18	74:15,15,17,22	85:12
87:10 94:21	61:3	47:16 51:25	90:6	modest 84:20	74:23 78:5,9	Neville 40:5,10
95:11,14	longer 9:13	61:18 70:2	method 30:21	module 23:23,24	79:11 88:15	73:21 74:1,3
Lewis 84:23 85:2	93:25	75:17,22 93:7	methodologies	23:25 24:2,14	named 65:8	78:22
85:5,10	look 23:11 70:22	93:15	38:8	24:15,16,17,18	79:15 88:3	new 44:24 47:23
liability 76:8	77:17	matters 1:10	methods 26:22	41:6 49:1	names 68:8,11	54:5 61:7
80:6 90:10,18	looking 7:14	28:16 30:22	27:13,14 33:14	modules 23:22	74:9,16,18,20	92:21 93:19
liable 80:23	18:10 19:3	58:2	35:7 36:4 37:8	24:5,6,13,20	74:21,24 86:10	news 2:16 3:20
libel 26:1	loosely 28:1	Matthew 38:24	37:12 38:1,7	modus 44:5	86:14,23 87:4	3:24 21:6,8
liberal 48:20	LORD 1:4 52:19	mature 31:6	40:22,25 42:18	65:15	89:18	26:14 28:11
Libyan-backed	86:18 87:10	Max 69:17 74:9	44:11 45:18,20	moment 43:12	narrative 14:23	33:14 37:2,25
33:25	94:21 95:11,14	81:23	46:22 47:15	52:20 75:23	14:25 18:11	39:25 40:1,2
licence 45:8	lose 38:1 39:5	maximum 60:24	66:2 92:24	95:11	25:14,22 26:12	53:8 56:19
licensing 50:9	lost 10:8	Mazher 40:17	Metropolitan	moment.Whitt...	26:19,19,24	62:18,23 63:5
lie 35:22	lot 37:17 60:13	McPherson 70:3	78:20 86:25	54:16	27:2,6 28:8	63:11,17 64:9
lies 29:2 35:10	loud 17:8	McPherson's	88:1	Monday 1:1	narratives 25:2	64:21 65:4,11
life 1:15,24 29:2	low 59:14 89:15	74:18	Michael 79:5	monitoring 6:15	28:14,25 29:6	67:1 69:1,8
31:9 42:1 46:2	lower 42:2 83:19	mean 13:6 14:13	87:22	monolithic 21:21	national 5:2	70:8 71:13
71:6 73:7 93:7	lucrative 59:4	22:1 24:14	microcosm	months 6:16	22:12,16 34:4	72:19 73:4,5,8
lifestyle 48:21	luncheon 95:17	49:2 65:12	61:17	9:11 76:17	50:11 53:19	73:19 74:2,25
light 5:14,23	M	80:22 86:18	microscopic	moral 16:25 23:7	54:14	75:13,18,23
13:21 22:7	machine 66:23	90:19	23:17	89:22 90:3	natural 8:22	76:4,8,20,22
63:24 80:4,19	macroscopic	meaning 30:24	middle 22:6	Morally 44:22	nature 19:15	77:2,8,15,22
82:12	23:16	means 9:18	mid-market 3:21	mores 19:7,11	31:8 41:11,13	78:3,12,18
likelihood 8:5	magazines 56:8	13:15 22:21	Miller 75:23	morning 1:4	42:23 52:5	79:2,11,15
limit 6:25	magnification	36:3 37:23	76:14 77:22	10:4	57:10 58:9	82:11,13,23
limited 12:11	23:17	38:4 41:1 44:8	Miller's 76:12	morsel 93:1	63:19	83:7,24 84:4
16:5 22:21	Mahmood 40:17	59:9,10 80:2	77:7	morsels 48:1	necessarily 4:10	84:10,11,23
63:25 75:6	40:21 41:2	89:8	Milly 10:23 88:3	Morton's 91:12	18:17 27:13	85:9,12,14
85:11 95:8	Mail 56:13,17	meant 47:1	Milly's 11:2	Mosley 81:23	28:12,15 33:12	88:2,16 89:9
limiting 9:19	60:7	94:13	Milton 54:5	Mosley's 40:2	37:14 58:22	90:6,21 91:11
limits 82:8 93:6	main 9:21 49:1	measure 35:7	mind 1:17 2:4	Motorman 43:9	94:8	91:16 92:15,16
line 14:4 36:3	maintained 1:23	measures 17:2	9:17 13:17	52:18 53:2	necessary 8:2,3	95:1,6
49:11 72:13		34:9	14:10 39:19	54:1	9:19 11:21	newspaper 2:12
83:8 85:9						

2:17 21:25 22:1 50:20 64:10 85:3 94:18 95:1 newspapers 3:23 21:23 22:6 30:11 56:7,21 56:23 81:16 newsroom 21:2 news-gathering 38:7 44:11 45:18 46:21 NGN 80:10,21 80:23 81:6,14 NGN's 80:6,14 80:25 81:16 NHS 50:10 Nick 36:20 53:8 Nine 63:11 nip 15:25 non-existent 80:9 non-payment 71:16 norm 8:7 normally 59:8 north 31:13 89:23 nosey 93:13 notably 69:22 note 48:25 58:2 65:7 73:13 notebook 67:15 67:21 68:4 70:6 74:7 78:6 85:24 86:7 notebooks 67:4,5 86:3 88:7 noted 55:24 76:7 79:10 81:4 85:10 noteworthy 70:14 notice 10:11 40:20 70:25 noun 25:17 November 1:1 53:14 64:1 69:4 NUM 35:20 number 2:22 3:11,20 7:8 11:15 23:22 24:8,16 34:3 34:11,17 46:2 49:20 51:16 53:3 54:9,11 57:17 61:17 65:19,19,23,24 65:25 67:4,12 67:12,13,14 76:19 82:18,20 86:22 87:1 88:19,22 numbers 54:22 57:18 59:7,7 66:10,17 87:5	nutshell 53:2 <hr/> O objectionable 41:9 objective 6:17 27:8 47:23 51:7 61:9 obligation 30:14 observed 71:8 obsessive 29:25 obtain 38:4 49:21 50:22 64:8 73:12 79:3 80:2,15 obtained 33:11 44:9 54:4,11 55:23 57:6 58:11 59:8,10 59:14 76:5 obtaining 49:25 50:3,19 51:4 58:24 obtains 41:24 obvious 7:9 11:15,19 15:9 20:25 22:3 43:25 46:20 58:14 63:18 65:6,10 82:21 83:10 93:24 obviously 74:21 89:10 occasion 29:10 86:5 occasionally 59:3 occasions 17:19 86:15,15,16 occupied 87:17 occupy 94:4 occurrence 20:10 occurring 19:13 20:13 October 24:23 72:13 odds 83:13 offence 34:10 49:20 50:6,18 50:23 60:24 offences 52:2 54:2 55:2 60:11 81:4 office 53:11 57:3 57:14 66:22 officer 42:3 54:21 officers 53:20 54:1 63:10 68:3 86:2 offices 67:1 official 43:6 officialdom 36:18 officials 53:22 54:18	old 59:10 old-fashioned 33:23 39:17 omit 34:7 once 8:19 28:17 47:25 84:1 ones 92:3 one's 29:7 90:7 ongoing 13:14 66:15 online 53:9 open 1:6 3:3 5:10 10:14 77:6 opened 67:24 73:20 88:12 opening 5:13 10:13,15 24:18 37:21 56:20 open-textured 11:20 operands 44:5 65:15 operate 50:12 operated 24:10 44:25 75:12 operating 33:25 59:2 operation 19:20 43:9 52:18 53:2 54:1 68:3 68:20 72:2 74:9 86:2 88:2 operator 34:2 45:2 opinion 11:4 17:21,22 29:13 79:6,22 81:17 82:24 83:15 89:6,10 opinionated 29:24 opinions 17:17 opposed 33:9 oppressive 25:23 26:2 45:23 opprobrium 26:6 optimistic 51:24 optional 4:20 49:20 50:6,18 50:23 60:24 orders 52:2 54:2 55:2 60:11 81:4 office 53:11 57:3 57:14 66:22 officer 42:3 54:21 officers 53:20 54:1 63:10 68:3 86:2 offices 67:1 official 43:6 officialdom 36:18 officials 53:22 54:18	organisational 20:15 organisations 2:17 21:21 50:15 organised 53:12 organs 3:16 origin 86:12 original 48:4 75:7 ought 6:11 28:4 32:10 outcome 55:7 outgoing 87:4 outlet 65:25 outset 7:9 outside 4:16 5:3 9:8 15:4 17:5 30:25 59:3 69:18 92:12 overall 19:11 23:19 47:6,23 82:4 86:10 overlap 14:20 24:13 overlooked 17:21 overly 15:16 overriding 72:1 oversight 5:7 91:18 overstated 25:9 overstepping 39:20 93:23 overview 2:5 44:10 62:10 85:24 overwhelming 33:16 80:9 over-arching 62:10 owed 89:24 o'clock 95:14 <hr/> P packages 24:7 pact 41:19 page 67:9,9,23 70:16 71:9,15 77:19 pages 39:23 67:21 86:3 paid 12:18 32:15 41:25 44:3 55:22 57:10,11 63:16,21 71:14 83:13 painstaking 68:5 painted 70:18 paired 65:17 66:10 Pakistani 40:23 panoply 26:1 paparazzi 39:20 paper 32:10 36:9 62:25 75:17 papers 3:21 94:4	paraded 80:24 paragraph 35:15 59:1,19 70:18 70:19 73:22 77:12 87:20 paragraphs 40:6 81:17 parameters 11:19 28:20 82:8 Pardon 94:22 Parliament 1:22 11:8 61:16 Parris 38:24 parsimonious 88:11 92:3 part 1:5 2:5,15 3:25 5:9,10 7:18 13:7,8 17:1 21:3 23:22 24:22 46:13 48:18 61:18 62:6 68:15 72:18 78:3,4 83:4 84:3,24 88:10 92:18 93:2,12 93:14 parti 27:20 participant 4:25 8:1 participants 5:4 5:11 6:2 8:1 18:6 94:11 particular 6:2 7:20 17:15,17 20:4 21:2,16 21:25 25:4 26:6,21,23 33:6 35:1,4 39:23 43:11 44:8 45:4 48:12 51:4,10 51:16 59:19 62:2 65:6 66:11 67:6 68:19 70:7 87:19 particularly 6:4 18:22 25:15 43:16 90:7 particulars 76:13 77:5,12 parties 17:9 84:15 partisan 6:4 partnership 54:16 partook 89:13 party 16:2 pass 95:1 passages 79:21 password 66:6 76:25,25 passwords 66:12 66:13 pathway 66:9	pathways 66:19 patois 39:12 patterns 13:12 19:8 23:13 Paul 54:20 73:3 pay 31:7 73:8 paymaster 33:24 payment 41:17 43:18 63:16 69:11 payments 41:4,9 42:10 63:23 69:3,4,12 81:9 payout 82:14 PCC 32:6 60:18 60:18 PCC's 60:20 peer 93:4 penalty 60:24 penetrates 28:3 people 23:3 25:11 28:5,17 36:6,20 46:25 56:15 87:6 people's 27:16 perceive 5:6 8:4 perceived 4:1 perfectly 29:23 42:20 period 31:11 60:25 63:5,13 64:1 73:15,17 88:21 permit 9:6 permitted 20:10 31:24 perpetrated 43:1 perpetrators 11:6 perpetuation 19:23 person 50:2 55:24 86:6 91:2 persona 25:16 personal 2:18 15:19 25:13 27:20 39:10,13 42:24 43:6 49:16,21,22,25 50:3,19 52:10 53:12 55:19 59:9,11,15 79:24 persons 87:2 perspective 29:7 persuade 50:4 66:4 pertinently 66:25 pesimistic 82:13 Peter 39:21 phase 1:5 phenomenon 44:24 93:13 phone 4:22 5:18 12:1,4,7,12	23:13 26:13 32:4 34:17 37:2 43:7 44:12,21,25 45:3,5,16,24 47:17 48:5 50:10 54:22 62:1,2 65:17 65:22 66:3,11 66:18 67:11 76:25 78:2 95:2,4,7 phones 3:2 67:19 87:5 phone-hacking 85:7 photographers 39:19 phraseology 37:6 pick 24:24 picture 13:12 21:3,12 46:11 46:12,17,19 56:3 70:18,22 93:2,18 pictures 73:7 piece 49:10 67:22 pieces 30:5 42:14 51:19 57:11 59:12 66:9 75:16 pin 65:19,23,25 66:4 67:12 piquant 48:1 pithy 30:7 94:12 place 6:15 7:2 8:25 13:8,11 13:16 19:13 24:23 43:17 61:24 84:14 placed 13:5 72:13 83:1 86:25 placing 85:14 plaintiffs 32:12 planet 37:7 plan 36:16 plausible 72:3 play 31:5 92:11 played 7:18 plea 73:15 pleaded 55:3 77:4,21 pleading 78:17 pleadings 77:11 78:23 pleas 62:19 pleasant 23:25 pleased 3:8 5:7 pm 95:16 PNC 59:6 point 4:6 10:22 14:12 15:9 17:15 20:4 25:1 28:8,20
---	---	---	---	--	---	--

29:4 30:3 31:5 33:14 37:21 41:10 44:21 47:7 51:21 62:17 66:23 74:6 75:18 76:13 81:3,19 91:22 pointed 20:24 pointing 89:23 points 13:19 77:21 police 1:23 2:8 2:19 4:11 10:20 13:14,24 14:15,20 15:5 23:15,25 41:7 41:16,24,25 42:3,5 50:11 53:17,19,20 54:2,13,21 63:10 67:3,18 68:16 78:20 86:25 88:1,5 policeman 54:25 police's 13:18 74:7 policy 2:9 19:18 24:3 60:4 political 61:22 politicians 2:8 4:11 15:16,19 16:10 24:2 polygon 29:9 popular 30:6 portfolio 78:4 posed 3:11 18:22 position 13:21 26:16 28:22,22 40:10 positions 4:15 positively 56:12 possess 17:5 possession 65:18 possibilities 19:25 83:16 91:13 92:6 possibility 13:14 17:19 59:1 66:19 71:3 90:10 92:7,13 92:16 possible 9:19,25 14:1 16:24 19:10 20:2,19 25:12 29:1 41:7,10 45:1 54:3 55:11 59:22 60:15 61:20 62:12,14 68:17 80:1 91:18 92:4 94:14 possibly 82:6 posted 7:7 potential 31:19 92:5	potentially 87:1 88:19 power 15:15 19:18 27:15 31:20 34:24 60:6 powerful 15:11 25:6 31:18 36:23 80:19 87:17 powers 12:17 64:4 practical 18:13 24:13 70:15 practicalities 13:21 practice 2:6 6:20 12:2 20:6,8,11 20:12 23:1,6,9 33:19 39:6,7 42:15 45:7 66:2 72:14 practices 11:17 11:22,25 12:13 14:24 15:4 16:21 18:12 19:1,3,4,5,8 20:6,9,17 21:1 23:10 29:14 37:18,20 45:23 prayer 34:16 precise 47:21 57:22 precisely 45:4 55:20 preferred 50:12 prejudice 68:16 91:9 prejudices 27:7 premises 53:15 54:6,8 63:9 67:3 preordained 26:24 preparation 10:12 prepared 50:15 87:24 presence 8:3 present 6:24 7:10,21,23 9:3 45:15 87:23 90:8 95:5 presentations 3:5 presented 18:2 press 1:14,20,22 1:23 2:6,7 3:16 4:3,7,10,11,15 5:8,17 6:5,13 6:15,24 8:15 11:17 15:10,15 15:18 16:10,11 16:21 17:4,8 18:12,18 19:1 20:4 21:19,24 22:12,16 23:24	24:1,10 25:4,7 25:18,23 26:7 26:12,20,21 27:11,15 28:1 28:4,22,22 29:18 30:6,14 30:20 31:6,8,9 31:14,17,18,20 31:24 34:21,23 35:1 37:7,18 38:12 41:23 42:12 45:23 46:23 48:6,14 48:15,18 49:14 55:12 60:13,19 61:19,21 93:11 93:23 94:10 pressed 94:10 pressure 21:5,9 25:8,12 92:20 pressures 16:9 25:10 92:21 Presumably 45:4 58:5 pretend 50:2 pretending 35:24 prevalent 93:6 prevent 20:12 preventing 36:11 previous 56:4 82:1 previously 9:10 pre-conceived 22:7 pre-existing 16:13 pre-judge 21:17 pre-sentence 70:19,21 price 53:5,5 57:10,11 59:13 Prices 59:12 prides 40:21 prima 27:19 34:9 50:18 primarily 43:3 49:17 primary 49:14 Prime 9:10 11:8 61:11 Prince 45:5 principal 24:17 50:17 principle 31:8 32:23 42:5 43:25 48:3 93:7 principles 14:10 91:6 print 10:19 43:17 78:4 pris 27:20 prison 84:1 privacy 26:3 27:20 35:2,4 38:3,9 40:2	41:22 42:15,24 46:7 47:6 53:5 53:5 76:15 78:15 80:8 81:24 private 3:2 25:17 25:20 28:4,10 36:14 38:19 41:5 42:10,17 42:19 43:11,19 45:6 46:23 48:2 50:7 53:16 54:7 58:13 62:24 63:2 68:11 73:7 74:10,11 74:19,22 76:21 77:1 78:14 88:15 privilege 14:6,8 14:11 pro 61:6 probabilities 72:17 probable 57:8 probably 52:19 57:18 62:25 69:25 76:1 probe 18:9 probed 18:4 problem 18:14 20:14,23 48:12 91:24 problems 17:11 19:13,14 proceed 5:15 24:25 79:4 proceedings 7:5 8:20,23,25 9:8 15:14 16:12 57:21 58:4 60:4 62:18 63:25 68:13 70:4,16 71:24 73:16 75:2,5,6 75:12,20,21 77:3,18 78:11 84:2,7,18 91:10 proceeds 37:1 81:12 process 24:11 58:15 84:13 procure 80:21 procured 50:25 58:11 60:9 90:22 94:6 procures 50:19 procuring 51:5 55:12 77:14 produce 25:12 product 19:17 30:15 35:8 45:19 47:11 products 76:22 professional 25:13 69:22,24	profile 10:20 progresses 15:1 prolific 57:17,19 76:1 86:13 promoted 20:9 20:11 prompted 79:2 prongs 91:12 pronounce 29:20 proof 72:6,11,15 85:6 90:18,20 proper 9:5 13:18 42:20 properly 23:10 47:9 property 32:23 proponents 28:8 proportionate 18:14 propose 37:22 62:8 proposition 22:4 proprietary 93:24 proprietor 27:3 prosaic 39:12 prosecute 33:5 prosecuting 17:14 67:8 69:10 prosecution 2:20 64:12,14,19 65:2 67:24 70:6 71:22 81:5 prosecutions 13:15 prospect 52:7 prospects 80:6 protect 43:23 49:17 protected 36:24 69:8 protection 14:11 34:10 36:14 43:4 49:4,7,10 49:13,19 52:3 52:5 54:2 57:8 58:24 60:23 61:8 90:11 protections 14:4 protective 17:2 prove 55:17 64:12,19 65:3 67:15 71:25 73:10 84:8 proved 64:14 84:21 proven 58:22 68:5 provenance 51:1 59:13 provide 2:22 6:20 14:23 41:12 62:10 63:20 81:6,15 85:24,25	provided 27:14 32:20 33:19 41:20 42:7 57:16 68:2 69:15 75:19 82:25 provider 66:3 67:14 provides 1:23 69:14 94:8 providing 30:18 81:19 provision 61:5,8 provisional 20:5 provisions 44:15 49:8 provocateur 40:15 prurient 47:13 94:2 pseudonym 73:3 public 1:17,24 4:12,21,24 11:4 12:4,9,15 12:17,18 13:9 13:17,20,23 15:23 16:14 18:16 23:24 25:5,14,16,21 27:18,24 31:9 32:8 33:4,7,16 34:14 35:3,8 35:10,18 36:1 36:6,8,10,12 36:15 38:14,23 39:9 40:16 42:15,19 43:24 45:10 46:24 47:1,10 48:8 48:11,16,17 49:2 51:6,12 51:15 52:1,3,8 57:25 58:4,9 58:12 61:6 69:21 72:24 79:7,23 80:24 80:25 83:1,8 85:9 87:1 88:13 89:1,20 89:24,25 93:8 94:13,16 publication 56:9 80:22 publications 47:15 publicised 78:25 publicity 6:7 69:18 published 45:19 53:24 60:13 64:9 73:2 76:19 publishing 76:5 pull 15:24 punches 15:24 punchy 30:8 punctilious 62:9	punishingly 26:10 purblindness 19:24 purchase 45:1 purchased 32:9 purpose 9:7 49:14 64:7,12 70:12 72:18 85:25 purposes 20:1 32:11 33:1,13 64:18 66:14,25 68:15 75:15 79:20 85:13 88:10 91:10 pursuant 5:22 40:20 57:6 64:15 65:1 pursued 94:1 pursuit 26:22 put 5:23 6:6 27:1 27:24 28:18 71:20 83:19 putting 28:14 75:22
Q						quad 7:6 quality 29:19 42:2 44:23 quantity 88:20 quantum 81:21 quarter 52:22 quarters 48:13 Queen's 77:20 79:5 quest 92:25 question 2:2 7:10 8:6 15:17 38:14 43:13,16 43:20 51:11 63:18 73:12 questionable 40:25 questioned 84:6 questioning 18:5 questions 3:11 8:4 13:22 14:6 24:3 42:8 48:25 59:13 82:20 83:10 90:5 question-beggi... 15:2 quid 61:6 quite 2:10 14:22 28:23 94:10 quo 61:6 quote 51:3 79:16 79:22 94:17
R						radio 45:1 radius 45:4 raid 53:18,21 55:16 61:24

raided 63:9 67:3	6:23 28:21	45:16 46:20	30:23 32:5	10:18 11:7	save 17:7 22:21	88:8
raise 58:18 59:12	29:21	58:13,21 66:21	46:8	28:9 79:1	saw 89:21	Select 10:6 40:7
raises 42:15	recognised 30:13	67:6,24 68:9	reports 30:21	revenues 27:9	saying 41:8	40:11 73:1,18
43:20	recommendati...	69:6,12 70:11	53:4 60:12	review 85:11	scale 12:15 54:15	73:22 78:25
raising 11:4	4:7 61:5	71:16 72:11	80:18	93:21 95:4	87:16 92:15	83:1
range 3:8 15:12	recommendati...	73:6 76:7	represent 5:1	revisions 28:11	scandal 32:7,14	self-contained
19:24 20:6	6:22 60:22	80:15 81:8	represented 18:1	revulsion 52:4	47:17	24:7
25:25 29:22	61:23	83:15 85:23	representing	reward 50:16	scandals 31:22	self-denying
30:16 38:8,16	recorded 40:21	86:12	3:20	Reynolds 35:3	scarcely 11:20	14:17
39:11 45:21	45:6	relations 35:19	reputation 81:1	re-amended	Scargill 35:17	self-directed
48:7 72:22	recordings 87:8	69:21 94:3	request 5:21	76:13 77:5,12	scenes 9:25	90:4
74:20 92:4	87:15	relationship 2:7	requested 55:20	Richard 49:6	sceptical 29:24	self-evident
rare 17:19	records 54:12,23	23:23,25 24:1	55:25	rifling 39:11	scheme 64:12,16	31:18
rat 36:20	59:16 69:11	54:17	requests 57:18	right 14:18 15:20	67:5	self-evidently
rate 63:7	recover 81:25	relationships	require 44:16	22:25 23:5,8	scientific 29:11	50:16 52:1
reach 20:5 33:3	recovered 35:20	1:21 4:10	required 2:23	29:16 36:7,9	30:17,21,22	self-incriminat...
62:6 92:8	rectifying 34:23	relatively 43:25	11:21 18:25	58:12 89:11	scope 14:6 16:4	14:7
reached 57:9	recurring 14:25	88:21	90:23 93:16	90:1	24:19 71:23	self-same 15:22
85:19,22	redacted 80:12	relativistic 26:5	requirement 5:6	rightly 11:4	scrutinise 43:18	15:24 27:21
react 22:15	reduced 3:12	27:22	requires 2:5	94:10	scrutinised 44:3	sell 30:15
reaction 60:21	reducing 21:6	relevant 3:13	research 63:1,15	rights 1:16,20	scrutiny 15:20	seminars 3:7,10
read 3:6 7:15	refer 78:23	6:21 14:23	81:6,20	6:19 14:4 73:6	search 13:12	4:5 24:23 29:5
34:14 40:18	reference 5:11	21:5 23:5,9	researchers 18:8	right-thinking	42:13 53:14,16	29:17 30:4
70:20	9:14 11:13,16	24:17 28:17	researching	23:3	54:4	48:20
reader 27:7 30:8	13:5 14:16	31:1 33:8	79:18	RIPA 64:5,25	second 3:1 7:25	send 3:13
readership 30:12	18:25 31:1	34:13 51:9	reset 66:4	89:3 90:22	14:12 31:8	senior 79:3 80:10
48:19	72:22 77:24	62:15 85:17	resignations	rise 52:23 83:10	56:11 74:6	82:23 84:4
reading 29:21	84:21 92:9	88:18 90:22	10:20	87:16 92:13	80:3	85:3 91:13
56:21	referred 4:19	reliable 46:16	resolve 93:16	risk 36:18 41:19	secondly 12:15	sensationalist
real 5:23 18:20	40:5 67:19	relied 85:8	resource 93:25	42:24	17:4 39:9	46:8
25:14 30:19	79:8 84:7	relies 35:6	respect 16:7 58:2	risks 60:19	58:12 60:7	sense 15:1 23:19
50:7	referring 21:19	rely 58:4	89:10	robustly 1:19	66:11	29:7 41:15
realised 11:3	43:3 70:19	remain 3:15 8:22	respected 42:25	rogue 26:14 83:8	secrecy 85:20	46:3 47:20
realistic 82:8	71:2 79:24	28:4	respective 22:8	88:14	secret 93:4	68:22 86:1
realities 18:21	80:17	remainder 57:5	respects 11:15	role 17:13 25:18	Secretary 45:9	sensible 5:4
70:15	reflect 4:18	remains 9:17	responded 5:20	36:17	secretly 94:19	sensitive 43:21
really 13:8 41:23	18:21	72:10	response 61:21	room 8:13,16,20	section 5:22 16:5	sent 73:19
47:11 48:11,22	reflected 61:5	remarks 10:13	61:22,22	17:4 21:6	40:20 49:19	sentence 55:3
reason 8:24 9:16	Reform 16:6	71:10	responsibility	91:21	51:2 60:23	71:3
15:15 57:24	refrain 14:14	remembered	44:7 90:13,14	rooms 3:20 8:16	61:3,7,8 64:4	sentenced 81:4
reasonable 12:20	regard 3:16	9:14	responsible 2:17	root 15:10	64:25 90:22	sentencing 10:8
37:9,11 46:25	33:10 57:9	remembers	4:15 50:10	route 31:12	sections 4:3	62:19 71:10
66:8	70:24 93:19	10:16	responsibly	royal 39:22	21:23 30:6,19	separate 21:20
reasonably	regardless 16:15	reminded 94:15	42:22	47:19 48:2	34:22	57:2 61:14
51:24 53:7	regards 41:17	reminds 33:22	rest 94:25	62:23 64:6	secure 43:1	63:23 70:22
reasoning 58:15	82:1	38:25	result 2:24 6:13	65:9 67:11	secured 78:20	separated 8:14
reasons 15:24	regional 3:21	remotely 65:16	32:4 51:19	68:9,23,24	security 3:2	separately 58:19
16:1 23:21	22:11	87:7	resulted 71:14	69:19 81:10	66:14	76:12
34:7 51:13	register 59:11	remuneration	resume 95:14	royals 47:24	see 5:4 16:13	September 9:12
57:22 60:15	registration	63:7	retain 30:8	rubric 47:6	19:8 51:14	63:6 76:24
65:6	54:23	repeat 1:13 9:17	retired 54:25	ruled 68:12	56:22 61:7	sequence 82:21
receive 16:20	regulate 23:1	14:5 72:3	retrieval 65:19	rules 21:15 36:19	67:10	sequencing 13:9
28:18 95:7	regulated 42:22	report 9:11	65:23 66:10,17	ruling 7:25	seek 23:12 24:24	series 10:18
received 5:15	regulator 33:9	16:12 32:6	67:12	run 58:6 86:3	42:18 65:2	21:20 25:23
34:3,21 40:19	regulatory 2:9	40:6,11 53:24	retrieved 54:22	89:1,5	70:6 71:22	76:15
63:6 69:3	3:4 24:4 33:13	56:11 59:1	retrospectively	running 83:8	91:9 94:19,23	serious 11:11
81:23	64:4	70:20,21 72:12	7:14 37:12	runs 57:19	seeking 18:10	36:11 52:1
receives 26:6	relate 86:5	73:1,18,22	return 9:9 12:19	ruthlessly 26:21	34:5 35:17	seriously 42:25
receiving 2:23	related 44:13	reported 15:14	24:15 63:15		92:1	94:22
45:21 55:12	73:15 85:3	reporter 26:14	73:8	S	seeks 14:10	seriousness 6:9
recherche 52:5	relating 78:9	36:21 39:25	returning 13:4	safeguard 35:5	seen 7:17 23:14	served 12:4 84:1
recipient 40:5,9	79:25 81:9	40:1 73:19	46:12 49:1	safety 12:1 88:9	40:12 44:15	service 31:7
73:24	95:5	74:3 83:9	81:18	salacious 93:1	67:22 78:8	63:15 67:14
recipients 87:13	relation 3:17	88:14	revelation 10:22	SAS 69:12	88:4	services 63:19,22
recognisable	7:20 10:6 20:4	reporters 39:19	68:14	satisfied 9:3 51:9	sees 20:18	66:3,6,13 81:7
47:20	22:10 23:13	reporting 9:8,15	revelations	satisfies 5:5	seized 53:20 54:8	81:20 86:14
recognise 4:19	41:24 43:10	14:8 21:7		satisfy 94:2	55:15 56:2	serving 53:19

session 3:3	82:19 83:15	Southern 3:22	36:12 40:19	46:13 56:20	supported 87:18	72:20 76:10
sessions 3:1	89:3,10	so-called 47:9	60:16 77:6	72:12 85:22	supporting 85:9	taskings 86:4,17
set 10:17 11:9	similar 32:16	sparked 84:22	87:20	90:9 91:4 92:6	suppose 91:21	86:22
17:10 28:20	54:17	speak 3:15 5:12	statements 7:17	submit 8:5	sure 72:8	taste 29:20 52:7
40:11 67:13	similarly 7:25	6:12 17:1	54:13,13	submitted 43:19	surely 34:13	94:2
77:11	32:8	81:18	states 78:6	submitting 33:2	surprising 58:7	tastes 30:11
sets 51:7	Simon 69:25	speaking 16:19	station 54:21	subsequent	71:21	taxpayer 12:18
setting 10:21	74:16	25:5 35:9 70:8	status 8:1	73:16	Surrey-based	Taylor 69:23
16:1 21:15	simple 2:1	specialist 54:19	statute 52:6	subsequently	53:15	73:7,25 78:22
66:5	simplify 65:15	species 47:21	61:13	53:25 77:6	surrounding	79:25 80:8,24
settle 26:11	simply 7:11,17	specific 2:15	statutory 12:17	78:16 85:8,11	80:13	82:14 83:13
settled 77:7	27:24 31:7	20:25 29:10	44:14 61:14	substantial	surveillance 28:9	Taylor's 73:14
settlement 82:11	37:5 78:6	43:8 48:5 60:4	84:13	80:13	38:17 39:2	74:15 78:10,19
82:16,24 84:14	89:23 91:5	specifically 2:7	stealing 39:10,13	substantiated	suspect 34:17	79:18 81:13
84:20	simultaneously	6:11 81:14	stemmed 20:9	46:10	suspected 53:11	82:3,12
settlements 84:1	9:7	specifying 78:7	steps 15:17 49:17	subterfuge 36:19	53:18	team 2:13 7:18
85:18	sinew 62:5	spectrum 11:22	stereotyping	37:4 38:10	suspects 13:25	75:19
seven 9:21 11:9	single 12:7 21:21	11:23 12:1	22:3	44:22	suspicion's 53:13	teams 40:18
Seventhly 78:10	56:24 86:24	speculate 44:18	Steve 43:11 54:6	subterranean	Swain 33:23	technical 18:21
sexual 94:3	Sir 91:2 95:10	60:14	56:5	24:10	Swain's 34:9	technique 50:13
shadow 16:17	sit 7:21 9:21 10:2	speculation	stifle 6:14	subtle 19:20 20:3	35:21	techniques 33:24
shape 38:9 62:25	10:3	90:24	stipulation 84:17	successful 36:22	synthesis 62:11	36:23 38:8
Sheik 40:17	site 39:5	speech 6:14	stolen 32:18,24	76:2	system 24:4 26:7	39:3 40:15
Sheiks 39:22	sitting 10:10	spend 9:13	33:2	successfully	33:13 45:1	technological
Sherborne 5:12	situation 12:25	spicey 48:1	stone 13:1	62:13	64:17 75:12	44:17
75:4	41:23	spirit 5:25	stops 90:6	Sue 39:23	78:16	technologically...
shining 31:15	situations 21:17	spoke 66:12	stories 4:9 30:8	suffice 90:19	systematic 46:6	39:18
short 18:9 30:7	41:4	spoken 9:10	36:16 41:5	sufficient 7:16	59:4 76:15	technology 93:4
52:25 61:3	Sixthly 77:24	sporadic 19:4	64:21 71:14	14:23,25 18:11	systemic 20:21	Telecommunic...
shortcomings	sketch 24:19	Sport 40:7 78:25	75:17 80:22	23:7 33:17	91:24	34:2
4:2	skill 30:9	Sports 73:1	81:16 92:21	37:7 49:16	systems 13:13	Telegraph 32:15
shorthand 9:23	Skylet 69:20	spot-fixing 40:23	story 16:24	64:13 77:10	19:6,11 20:14	32:20 33:1
52:21	74:14 76:1	spread 94:3	25:12 26:22,24	suggest 7:19 8:4	22:8 23:13	Telegraph's
shortly 5:10 7:3	slate 22:9	springboard	27:6 32:4 34:7	28:12 86:24	43:17 91:16	39:15
45:16 53:7	slightly 65:20	18:12	35:21 36:1,6	88:23	T	telephone 8:24
81:22	82:6	stables 26:17	39:16,23 40:1	suggested 3:4		34:3 51:16
shot 60:19	slim 80:8	28:12	44:8 53:2 61:3	18:6,7 72:13	tables 48:10	54:12 59:6
show 36:20	socialist 93:15	staff 21:6,9 74:2	93:2 95:2	suggesting 17:11	tabloid 3:21 22:5	65:17 66:2,23
showed 54:8	solely 85:25	stage 5:19 11:11	straightforward	24:6 93:11	26:20	67:1
69:11	93:11	28:20 32:5	66:1	suggestion 3:9	tabular 56:11	telephones 38:19
shown 8:17	solicitor 80:5	33:3 35:12	straitjacket 92:2	suggests 60:1,8	tailored 27:1	telephonic 44:24
63:17	solicitors 42:13	38:6 41:10	streamed 7:5	63:24 88:17	take 2:5 4:21	telephoning
shrink 27:12	84:24	45:12 46:18	strength 58:19	sum 32:10 69:3	6:15 13:16	65:22
sic 94:19	solid 51:14	59:22 65:6	strengthening	82:5,14	15:17 18:5	telephoto 38:21
sickened 11:5	solutions 18:13	68:6 83:5	61:6	summaries 3:10	19:2 23:20	tell 37:19
side 29:8 41:13	18:17,18	85:22	Strictly 70:8	summarise 1:7	31:3 49:16	telling 75:4
75:22	somewhat 21:14	stamped 19:22	strike 27:6	34:7 45:15	94:19,21	temptation 93:4
sides 16:24 17:25	23:6 52:4 55:6	standard 51:10	stronger 87:25	summarised	taken 3:17 57:21	tenacious 32:5,8
Siena 75:23	62:8 91:8	58:23 65:3	strongly 30:4	38:24	58:8 83:19	tend 93:13
Sienna 76:12	sort 16:9 27:25	71:25 72:6,11	struck 25:1	summarising	94:24	tends 19:12
77:6,22	45:9 48:21	72:14,15,16	stuff 47:23	53:3	takes 13:11 30:9	term 15:2 41:15
sight 38:1	54:16 66:9	90:18	style 30:2	summon 16:25	talk 29:14	46:3 47:1,20
signed 73:5	69:14 89:8	standards 12:6	subject 4:8 6:5	sun 77:25 78:3,6	talking 29:11,11	terms 5:10 9:13
significance	92:25 93:16	17:20 22:17	7:1 12:23	93:20	38:7	11:4,13,16
74:22 77:21	sought 43:2 48:6	25:13 26:5	14:15 15:19	Sunday 32:9	tantalising 92:21	12:3 13:4
significant 11:15	58:4 84:8	33:8 42:20	16:13 24:19	33:20,22 35:15	target 9:17 42:24	14:16,19 18:24
36:16 88:20	sound 43:25	stark 53:24	30:2 40:4	36:17,21 37:13	49:13 68:10	19:2 22:19
significantly	sounding 21:14	start 1:12 10:10	46:23 47:16	40:18 56:15,18	86:8,9	24:13 31:1
60:2	source 41:20	12:8 22:8	49:20 51:2,25	56:23	targeted 6:12	41:18 42:12
silent 9:7 83:14	42:4,8 43:6	29:16 52:20	61:18 70:2	supervision	67:11	71:21 77:8
Silverleaf 77:20	44:5 69:7	starting 5:16	75:17	91:18	targets 68:23	84:2,15 90:8
79:5,10,13	sources 41:5,11	9:22 33:14	subjective 23:6	supplied 54:19	75:6 86:6 90:3	90:13,14,17
80:17 81:21	41:14,25 43:20	62:7	26:5 27:21	supply 54:10	tarnished 22:2	92:9
82:1,7,24	43:24 44:3	state 45:9,15	36:8 61:10	support 15:18	tarred 22:12	territorial 16:4
87:22	53:4 54:11	90:8 95:5	submission 92:1	16:2,3 23:7	task 2:21	terrorist 33:24
Silverleaf's 79:6	Southampton	stated 85:11	submissions 5:14	34:5 35:18	tasked 17:14	33:25 34:18
79:22 81:19	3:22	statement 32:21	10:15 24:18	78:5	43:14 50:22	51:17

test 36:5,8 51:7 61:9	40:18 56:23,23 56:25 65:11 94:16	tried 40:3 trigger 10:21 Trinity 3:24 trivial 29:25 true 28:25 29:1,6 34:25 71:17 86:6,8,9 89:23 truly 4:23 12:23 trump 27:25 trusted 42:4 truth 18:10 29:2 29:11 35:22 38:3 94:23 try 10:8 turn 2:25 3:17 49:4 65:14 83:25 turning 35:13 48:10 twin 8:13 two 3:7 11:7 13:7 13:19 16:16 23:24 24:20 25:2 35:15,20 53:4,22,25 54:7 58:2 59:21 60:12 62:6 64:13 66:9 83:16 91:12 two-way 38:20 two-year 60:25 type 48:9 82:18 typical 13:9 typically 65:18 65:20	62:3 undertaken 10:12 undertook 63:14 undoubtedly 39:7 unearth 89:9 unethical 4:23 5:17 11:24 12:13 20:17,25 22:22,23,24 23:3 37:21,25 39:2,8 45:23 unethically 28:3 unexpected 8:21 unexpressed 17:18 unfair 42:22 45:23 46:8 84:2 88:24 Unfortunately 90:1 uninvestigated 31:22 Union 5:2 34:5 unique 65:19,23 66:10,17 67:12 87:4 United 31:9 unlawful 2:15 37:25 62:2 76:23 80:2 unlawfully 54:10 unnecessarily 8:11 unobjectionable 29:18 unobtrusive 9:6 unpopular 31:21 unprecedentedly 11:14 unprecedentedly 15:8 unprofitable 27:10 unreliable 16:23 unscrupulous 26:8,21 50:14 untrue 41:20 unturned 13:1 unusual 82:17 unwelcome 6:7 upper 82:19 uproar 35:18 upshot 77:8 use 7:12 9:4,6 21:8 36:4 37:8 38:21 42:13,17 43:20 66:1,5 76:4 80:1 useful 15:2 37:4 users 86:13 usually 19:15 41:9 50:7 76:11 utterance 1:17	<hr/> V <hr/> vague 57:4 valuable 42:1 55:18 varied 67:9 variety 87:5 various 67:19 78:21 82:3 vast 12:23 vehicle 50:9 53:21 54:23 version 20:13 27:11 91:23 vessel 62:5 vicarious 76:8 vicious 93:25 victim 35:25 88:3 victims 5:17 45:22,24 87:3 Videos 3:9 view 11:12 17:16 58:5,8 64:9 85:6 86:8 89:4 89:12 viewed 85:20 viewing 29:9 views 3:8 29:23 30:16 vigilant 17:7 vignette 83:6 violates 22:25,25 violation 23:5 Violations 38:9 virtually 9:6 80:23 virtues 46:6 visited 3:20,23 34:3 visually 8:7 vital 6:19 31:24 voice 17:8 voicemail 10:23 11:2 64:6 65:16,18,21 68:19 73:14,23 76:16 77:14 79:10 87:5,11 87:14 voicemails 10:23 39:1 47:18 62:3 64:15,24 67:16 72:20 73:11 75:15 76:1 87:7 voices 17:5,9 volume 34:21 voluntarily 5:21 Vos 77:3,19 vouchsafed 57:13	want 8:5,10,23 27:4 Wapping 67:2 wardrobes 38:19 warned 90:25 warning 60:18 warrant 53:15 warrants 54:4 Warren 93:20 watch 8:20,25 water 61:25 way 1:15 4:3,4 5:4 15:13 20:4 28:3,19,23 64:20 66:23 72:2 77:13 83:20 89:23 ways 88:22 wealth 55:17 website 3:6,11 week 45:20 75:10 87:21 weekly 63:7 Weeting 68:3 74:9 86:2 weighed 89:8 weight 85:15 well-known 62:22 69:17,20 well-written 94:12 went 3:22 26:13 60:2 77:22 83:11 we'll 28:17 37:17 75:9 95:14 we're 17:17 18:10 29:11 we've 23:14 40:19 whistleblowers 17:3 Whittamore 43:11,14 54:6 54:24 56:5 61:24 Whittamore's 54:8 wholly 38:4 wide 3:8 widely 21:2 wider 21:12 41:15 89:24 90:15 92:11,13 93:2,12 94:14 widespread 19:3 19:5,9 20:7 wide-ranging 9:13 11:12 88:17 wielded 60:6 Wilkes 31:13 Williams 73:3 willing 17:2 willingness 90:2 Wills 69:13,13 window 83:6	wing 34:16 wiser 36:2 wish 3:6 6:6,14 7:12,15,16 9:11 13:19 21:16 28:24 42:12 45:11 47:4,5 52:12 withdraw 15:18 Withdraw 33:22 37:1,15 Witherow's 34:14 witness 8:6 14:10 32:21 40:19 60:16 87:20 witnessed 16:25 witnesses 6:1 7:20 13:22 18:3 24:14,16 37:18 41:5 word 22:20 worded 81:18 words 1:9,18 6:9 29:16 32:19 36:2 53:23 55:14 65:16 73:20 80:12 work 4:3,10,12 9:24 13:18 32:8 34:22 35:1 43:9 49:5 52:15 75:14 86:2 workable 18:13 18:20 workbooks 55:19 worked 54:7,9 56:7,8 Workers 34:5 working 12:22 22:1 25:8 41:14 52:21 62:25 64:5 65:4 68:18 78:7 works 4:7 26:19 world 9:8 13:6 18:20 26:14 29:22 30:16 37:2 39:25 40:1 50:7 56:19 62:18,23 63:5,11 64:9 64:21 70:8 71:6 73:5,8,19 75:13 76:20 95:1,6 worlds 93:4 World's 63:17 worse 83:12 worst 12:2 worth 46:18 57:20 worthwhile 1:7 worthy 58:2
test 36:5,8 51:7 61:9	40:18 56:23,23 56:25 65:11 94:16	tried 40:3 trigger 10:21 Trinity 3:24 trivial 29:25 true 28:25 29:1,6 34:25 71:17 86:6,8,9 89:23 truly 4:23 12:23 trump 27:25 trusted 42:4 truth 18:10 29:2 29:11 35:22 38:3 94:23 try 10:8 turn 2:25 3:17 49:4 65:14 83:25 turning 35:13 48:10 twin 8:13 two 3:7 11:7 13:7 13:19 16:16 23:24 24:20 25:2 35:15,20 53:4,22,25 54:7 58:2 59:21 60:12 62:6 64:13 66:9 83:16 91:12 two-way 38:20 two-year 60:25 type 48:9 82:18 typical 13:9 typically 65:18 65:20	<hr/> U <hr/> ultimate 6:21 44:6 Ultimately 30:12 37:24 unaccountable 28:6 unbuckle 92:1 uncensored 48:14 uncontroversial 44:1 uncover 47:23 underhand 27:13 34:9 66:1 89:17 underlying 13:10 32:17 38:5 underscore 51:21 understand 30:17 understanding 27:3 70:4 78:1 understands 13:20 32:22 understood 46:4 71:18 undertake 20:2	<hr/> V <hr/> vague 57:4 valuable 42:1 55:18 varied 67:9 variety 87:5 various 67:19 78:21 82:3 vast 12:23 vehicle 50:9 53:21 54:23 version 20:13 27:11 91:23 vessel 62:5 vicarious 76:8 vicious 93:25 victim 35:25 88:3 victims 5:17 45:22,24 87:3 Videos 3:9 view 11:12 17:16 58:5,8 64:9 85:6 86:8 89:4 89:12 viewed 85:20 viewing 29:9 views 3:8 29:23 30:16 vigilant 17:7 vignette 83:6 violates 22:25,25 violation 23:5 Violations 38:9 virtually 9:6 80:23 virtues 46:6 visited 3:20,23 34:3 visually 8:7 vital 6:19 31:24 voice 17:8 voicemail 10:23 11:2 64:6 65:16,18,21 68:19 73:14,23 76:16 77:14 79:10 87:5,11 87:14 voicemails 10:23 39:1 47:18 62:3 64:15,24 67:16 72:20 73:11 75:15 76:1 87:7 voices 17:5,9 volume 34:21 voluntarily 5:21 Vos 77:3,19 vouchsafed 57:13	want 8:5,10,23 27:4 Wapping 67:2 wardrobes 38:19 warned 90:25 warning 60:18 warrant 53:15 warrants 54:4 Warren 93:20 watch 8:20,25 water 61:25 way 1:15 4:3,4 5:4 15:13 20:4 28:3,19,23 64:20 66:23 72:2 77:13 83:20 89:23 ways 88:22 wealth 55:17 website 3:6,11 week 45:20 75:10 87:21 weekly 63:7 Weeting 68:3 74:9 86:2 weighed 89:8 weight 85:15 well-known 62:22 69:17,20 well-written 94:12 went 3:22 26:13 60:2 77:22 83:11 we'll 28:17 37:17 75:9 95:14 we're 17:17 18:10 29:11 we've 23:14 40:19 whistleblowers 17:3 Whittamore 43:11,14 54:6 54:24 56:5 61:24 Whittamore's 54:8 wholly 38:4 wide 3:8 widely 21:2 wider 21:12 41:15 89:24 90:15 92:11,13 93:2,12 94:14 widespread 19:3 19:5,9 20:7 wide-ranging 9:13 11:12 88:17 wielded 60:6 Wilkes 31:13 Williams 73:3 willing 17:2 willingness 90:2 Wills 69:13,13 window 83:6	wing 34:16 wiser 36:2 wish 3:6 6:6,14 7:12,15,16 9:11 13:19 21:16 28:24 42:12 45:11 47:4,5 52:12 withdraw 15:18 Withdraw 33:22 37:1,15 Witherow's 34:14 witness 8:6 14:10 32:21 40:19 60:16 87:20 witnessed 16:25 witnesses 6:1 7:20 13:22 18:3 24:14,16 37:18 41:5 word 22:20 worded 81:18 words 1:9,18 6:9 29:16 32:19 36:2 53:23 55:14 65:16 73:20 80:12 work 4:3,10,12 9:24 13:18 32:8 34:22 35:1 43:9 49:5 52:15 75:14 86:2 workable 18:13 18:20 workbooks 55:19 worked 54:7,9 56:7,8 Workers 34:5 working 12:22 22:1 25:8 41:14 52:21 62:25 64:5 65:4 68:18 78:7 works 4:7 26:19 world 9:8 13:6 18:20 26:14 29:22 30:16 37:2 39:25 40:1 50:7 56:19 62:18,23 63:5,11 64:9 64:21 70:8 71:6 73:5,8,19 75:13 76:20 95:1,6 worlds 93:4 World's 63:17 worse 83:12 worst 12:2 worth 46:18 57:20 worthwhile 1:7 worthy 58:2
test 36:5,8 51:7 61:9	40:18 56:23,23 56:25 65:11 94:16	tried 40:3 trigger 10:21 Trinity 3:24 trivial 29:25 true 28:25 29:1,6 34:25 71:17 86:6,8,9 89:23 truly 4:23 12:23 trump 27:25 trusted 42:4 truth 18:10 29:2 29:11 35:22 38:3 94:23 try 10:8 turn 2:25 3:17 49:4 65:14 83:25 turning 35:13 48:10 twin 8:13 two 3:7 11:7 13:7 13:19 16:16 23:24 24:20 25:2 35:15,20 53:4,22,25 54:7 58:2 59:21 60:12 62:6 64:13 66:9 83:16 91:12 two-way 38:20 two-year 60:25 type 48:9 82:18 typical 13:9 typically 65:18 65:20	<hr/> U <hr/> ultimate 6:21 44:6 Ultimately 30:12 37:24 unaccountable 28:6 unbuckle 92:1 uncensored 48:14 uncontroversial 44:1 uncover 47:23 underhand 27:13 34:9 66:1 89:17 underlying 13:10 32:17 38:5 underscore 51:21 understand 30:17 understanding 27:3 70:4 78:1 understands 13:20 32:22 understood 46:4 71:18 undertake 20:2	<hr/> V <hr/> vague 57:4 valuable 42:1 55:18 varied 67:9 variety 87:5 various 67:19 78:21 82:3 vast 12:23 vehicle 50:9 53:21 54:23 version 20:13 27:11 91:23 vessel 62:5 vicarious 76:8 vicious 93:25 victim 35:25 88:3 victims 5:17 45:22,24 87:3 Videos 3:9 view 11:12 17:16 58:5,8 64:9 85:6 86:8 89:4 89:12 viewed 85:20 viewing 29:9 views 3:8 29:23 30:16 vigilant 17:7 vignette 83:6 violates 22:25,25 violation 23:5 Violations 38:9 virtually 9:6 80:23 virtues 46:6 visited 3:20,23 34:3 visually 8:7 vital 6:19 31:24 voice 17:8 voicemail 10:23 11:2 64:6 65:16,18,21 68:19 73:14,23 76:16 77:14 79:10 87:5,11 87:14 voicemails 10:23 39:1 47:18 62:3 64:15,24 67:16 72:20 73:11 75:15 76:1 87:7 voices 17:5,9 volume 34:21 voluntarily 5:21 Vos 77:3,19 vouchsafed 57:13	want 8:5,10,23 27:4 Wapping 67:2 wardrobes 38:19 warned 90:25 warning 60:18 warrant 53:15 warrants 54:4 Warren 93:20 watch 8:20,25 water 61:25 way 1:15 4:3,4 5:4 15:13 20:4 28:3,19,23 64:20 66:23 72:2 77:13 83:20 89:23 ways 88:22 wealth 55:17 website 3:6,11 week 45:20 75:10 87:21 weekly 63:7 Weeting 68:3 74:9 86:2 weighed 89:8 weight 85:15 well-known 62:22 69:17,20 well-written 94:12 went 3:22 26:13 60:2 77:22 83:11 we'll 28:17 37:17 75:9 95:14 we're 17:17 18:10 29:11 we've 23:14 40:19 whistleblowers 17:3 Whittamore 43:11,14 54:6 54:24 56:5 61:24 Whittamore's 54:8 wholly 38:4 wide 3:8 widely 21:2 wider 21:12 41:15 89:24 90:15 92:11,13 93:2,12 94:14 widespread 19:3 19:5,9 20:7 wide-ranging 9:13 11:12 88:17 wielded 60:6 Wilkes 31:13 Williams 73:3 willing 17:2 willingness 90:2 Wills 69:13,13 window 83:6	wing 34:16 wiser 36:2 wish 3:6 6:6,14 7:12,15,16 9:11 13:19 21:16 28:24 42:12 45:11 47:4,5 52:12 withdraw 15:18 Withdraw 33:22 37:1,15 Witherow's 34:14 witness 8:6 14:10 32:21 40:19 60:16 87:20 witnessed 16:25 witnesses 6:1 7:20 13:22 18:3 24:14,16 37:18 41:5 word 22:20 worded 81:18 words 1:9,18 6:9 29:16 32:19 36:2 53:23 55:14 65:16 73:20 80:12 work 4:3,10,12 9:24 13:18 32:8 34:22 35:1 43:9 49:5 52:15 75:14 86:2 workable 18:13 18:20 workbooks 55:19 worked 54:7,9 56:7,8 Workers 34:5 working 12:22 22:1 25:8 41:14 52:21 62:25 64:5 65:4 68:18 78:7 works 4:7 26:19 world 9:8 13:6 18:20 26:14 29:22 30:16 37:2 39:25 40:1 50:7 56:19 62:18,23 63:5,11 64:9 64:21 70:8 71:6 73:5,8,19 75:13 76:20 95:1,6 worlds 93:4 World's 63:17 worse 83:12 worst 12:2 worth 46:18 57:20 worthwhile 1:7 worthy 58:2

write 30:5,10	77:19	29 73:19			
writer 52:21	16 64:23 65:5				
writers 9:23	69:16,17 70:11	<hr/> 3 <hr/>			
writing 3:12	71:12 74:6	3 16:5 77:19 79:6			
79:6 93:21	75:6 77:19	3,003 86:15,19			
written 72:12	164,000 57:12	86:20			
81:22	17 69:20 73:13	3,291 57:11			
wrong 3:17 17:6	73:25	303 86:18,20			
23:4	1760s 31:13	305 56:4,6,10			
wrongdoing	179 71:15	31 77:12			
16:25 37:5	18 69:23	318 87:4			
60:1	1890 93:21	33 56:18 87:20			
wrongs 34:23	19 69:25 76:3	35 73:23			
wrote 33:20	1981 43:22	38 87:15			
	1984 33:22 34:11				
	49:8 51:14	<hr/> 4 <hr/>			
<hr/> X <hr/>	1985 45:8	4 72:13 73:2			
X 50:2,7,12,15	1989 45:5	412 40:6 73:22			
50:18,22 51:1	1990s 45:11	416 40:6			
90:20	1997 63:1	425,000 82:14			
	1998 49:10	45 56:17			
<hr/> Y <hr/>	<hr/> 2 <hr/>	<hr/> 5 <hr/>			
year 1:17 10:17	2 2:15 95:14	5 87:10			
33:20 94:17	2,143 86:16,22	5,025 57:6			
years 13:2 56:4	2,266 86:4,22	5,795 87:4			
yield 93:3	2,500 85:3	5,3 59:1			
yielded 84:25	20 64:23 69:16	50 56:16			
	70:2,11 71:12	55 49:19 51:2			
	74:7 75:7	60:23 61:8			
	2000 49:9 64:5	568 87:9			
<hr/> Z <hr/>	2001 63:2,6	58 56:13			
zeitgeist 93:6	76:14 88:5	586 87:11,13			
	2002 11:2 53:14				
	88:3	<hr/> 6 <hr/>			
<hr/> 1 <hr/>	2003 54:4 55:16	6,330 57:8			
1 63:6,13 64:2,4	61:24	60 65:5			
64:25 65:14	2004 55:1	60,000 81:23			
66:21 67:7,17	2005 5:22 16:6	64 87:12			
67:24 68:7,10	63:14 64:1	679 57:19			
68:23 74:14	69:4 72:16	68H 70:16			
1,453 86:15,20	73:3,15,17,19	681 56:18			
1,998 57:4	74:1 76:16,18	690 87:8			
10 9:22 43:22	78:22				
10.30 1:2	2006 60:13 64:1	<hr/> 7 <hr/>			
100 45:2	69:4 71:22	7 10:4 53:7			
100,000 82:9	73:16,17 76:16	7,000 73:9			
104,000 63:21	76:19 88:8	70 71:9			
104,988 63:16	2007 62:21 71:22	700,000 82:14			
105 39:23	2008 40:3 61:4	73,000 84:20			
11 56:7 76:14	76:24 79:2,6	77 61:3			
11,000 86:3	83:9 87:23	78 61:7			
11.45 52:24	2009 40:8 88:6				
11.55 53:1	2010 73:2	<hr/> 8 <hr/>			
118 39:24	2011 1:1 77:2,19	8 54:4			
12 9:11 76:17	2012 9:12 75:3	802 56:15,17			
77:2,19	21 5:22 40:20				
12,300 69:3	56:7	<hr/> 9 <hr/>			
12-month 63:13	228 56:19	9 40:8			
12.57 95:16	23 56:19	92,000 63:8			
13 1:17 10:4	24/7 21:7	952 56:12			
13:24 73:24	25,000 82:5				
13,343 56:6 57:2	250,000 82:6,10				
60:2	252 86:15,21				
135 86:16,21	26,000 57:20				
14 1:1 76:2	27 88:16				
140,000 84:15	28 86:10				
15 64:2 65:14					
66:21 67:7,17					
67:24 68:7,10					
68:23 74:14					