

<p>1 2 (2.00 pm) 3 LORD JUSTICE LEVESON: Yes. 4 MS PATRY HOSKINS: Good afternoon, sir. The only witness 5 this afternoon is Mr Chris Atkins. I'm just going to 6 ask him to come up and sit and make himself comfortable. 7 Sir, before he's sworn and just while he's making 8 himself comfortable, I just want to remind everybody 9 that the cameras are switched off for this session. 10 Mr Atkins will be here and there is picture and audio in 11 the hearing room and annex only. Nothing will be going 12 through to the website broadcasters until after we've 13 finished showing the clip of the film that we're going 14 to see. 15 LORD JUSTICE LEVESON: All right. It ought to be clear that 16 I have agreed the restriction to the publication of the 17 evidence of this witness, such that although it will be 18 carried audio, Mr Atkins will not be seen on screen. 19 MS PATRY HOSKINS: That's correct. 20 LORD JUSTICE LEVESON: I have done so for reasons which 21 I have accepted. 22 Sorry, yes, Mr Brown? 23 MR BROWN: Of course, I don't know what those good reasons 24 are and I am prepared to accept they were persuasive. 25 Could I just enquire whether your Lordship, when</p> <p style="text-align: center;">Page 1</p>	<p>1 any sense impinges the free exchange of information 2 about the conduct of this Inquiry. Several witnesses 3 have requested different types of protection, the most 4 rigid being in relation to a witness who is known only 5 as HJK, whose visual appearance and voice were not 6 displayed, but his evidence was given in public and went 7 on to the website almost as soon as it had finished 8 after it had been checked to ensure that he had not 9 disclosed any information. 10 There is another witness who I know is going to come 11 who has sought similar types of protection because of 12 the work that he is generally involved in, and each one 13 of these decisions I have to consider with care, and 14 I do, and in my judgment the balance in this case is 15 clear. 16 MR BROWN: You've ruled, and all I wanted to be sure was 17 that you knew how widely available his recent image was. 18 LORD JUSTICE LEVESON: Yes. Mr Brown, you're right, but 19 that's not to say that had you said something different 20 to me, I might not have changed my mind. But nothing 21 you have said to me in my judgment impacts on the 22 particular reason for this particular request. In other 23 words, it wasn't a discourtesy that I didn't ask you 24 before I ruled. 25 Right.</p> <p style="text-align: center;">Page 3</p>
<p>1 exercising the discretion, took into account the fact 2 that Mr Atkins' image is easily obtainable on the 3 Internet by both a Google search and by going to the 4 Guardian Media website, where it's actually possible to 5 see, even, I think, now but certainly this morning when 6 I looked, a six-minute video clip of an interview with 7 Mr Atkins, full face, in which he promotes Starsuckers? 8 LORD JUSTICE LEVESON: Well -- 9 MR BROWN: I'm sorry, if I could just add: if the issue is 10 to do with his appearance, then, in my submission, that 11 needs to be borne in mind, that anyone can find 12 photographs and a video of his appearance on the 13 Internet. Indeed, it's just been done by the 14 Associated Newspapers team in court. 15 LORD JUSTICE LEVESON: It might be so, but the information 16 that has been passed to me suggests that there is good 17 reason why it would not be in the public interest that 18 his image be displayed as publicly as I have noticed 19 that images emerging from this Inquiry are being 20 displayed. I am not suggesting -- and it hasn't been 21 suggested to me -- that somebody could not in some way 22 find out what he looked like but the question is whether 23 what he looks like now could be linked to what he is 24 presently doing. 25 Mr Brown, I do not believe that making this order in</p> <p style="text-align: center;">Page 2</p>	<p>1 MR CHRISTOPHER WALSH ATKINS (affirmed) 2 Questions from MS PATRY HOSKINS 3 MS PATRY HOSKINS: Thank you, Mr Atkins. Could you please 4 state your full name just for the record. 5 A. My full name is Christopher Walsh Atkins. 6 Q. You've provided a witness statement to this Inquiry 7 which you should find in the folder which we've prepared 8 for you, right in front of you. Can you confirm that 9 the contents of that witness statement are true to the 10 best of your knowledge and belief? 11 A. Very much so, yes. 12 LORD JUSTICE LEVESON: Let me just ask this question as 13 well. Your image is not being displayed for reasons 14 which are set out in a request made to the Inquiry by 15 you or on your behalf. Are those reasons true? 16 A. They are. 17 LORD JUSTICE LEVESON: Thank you very much. 18 MS PATRY HOSKINS: You've already also provided a number of 19 annexes or exhibits to your witness statement, and they 20 are essentially transcripts of either telephone calls or 21 meetings that you had with various journalists. We'll 22 turn to those in more detail later in your evidence, but 23 what I want to confirm is this: is the content of those 24 transcripts true to the best of your knowledge and 25 belief?</p> <p style="text-align: center;">Page 4</p>

<p>1 A. Yes.</p> <p>2 Q. Are they full verbatim transcripts of the telephone</p> <p>3 calls and meetings that you had with the journalists</p> <p>4 involved?</p> <p>5 A. Yes.</p> <p>6 Q. Are they full and complete, ie does the transcript</p> <p>7 record every word that passed between you and the</p> <p>8 journalist on each of those occasions?</p> <p>9 A. No. In the case of the two additional transcripts</p> <p>10 supplied for the People and the Sunday Mirror, it's,</p> <p>11 I think, approximately half of the meeting.</p> <p>12 Q. Can you tell us why you haven't provided full</p> <p>13 transcripts to the Inquiry?</p> <p>14 A. There's a basic journalistic principle that you don't</p> <p>15 put unedited journalistic material into the public</p> <p>16 domain unless it's absolutely necessary. This is</p> <p>17 something, I think, that the newspapers in question will</p> <p>18 understand themselves, that they would never put</p> <p>19 unedited journalistic material into the public domain.</p> <p>20 It was actually the request of this Inquiry that I put</p> <p>21 larger sections into the annexes, which I've decided to</p> <p>22 do. There's nothing that's been left out that would in</p> <p>23 any way change what is being alleged of the newspapers</p> <p>24 and their behaviour.</p> <p>25 Q. I think I'll leave that there. If anything else arises,</p> <p style="text-align: center;">Page 5</p>	<p>1 which ended up being Starsuckers in due course.</p> <p>2 A. Over the course of making Taking Liberties, we were</p> <p>3 looking at the reasons that various laws had been passed</p> <p>4 that were eroding our basic rights and freedoms, and in</p> <p>5 lots of different cases, we found that the tabloid</p> <p>6 press -- and certainly the Murdoch press in</p> <p>7 particular -- were playing a very active role in</p> <p>8 increasing a climate of fear in amongst the British</p> <p>9 public, and there were certain cases -- for example, the</p> <p>10 raids in Forest Gate -- where the Sun and the</p> <p>11 News of the World were just actively smearing the</p> <p>12 suspects with information that presumably had been fed</p> <p>13 to them by the police. You also saw, in the case of</p> <p>14 Charles de Menezes, they effectively smeared a dead man.</p> <p>15 There were all sorts of lies put into the media and</p> <p>16 happily printed by various newspapers about Charles</p> <p>17 de Menezes that turned out to be wrong.</p> <p>18 We saw that no one was really correcting the press</p> <p>19 on this. We saw that the rest of the media was very</p> <p>20 unwilling to expose wrongdoing in the tabloids and</p> <p>21 I also read Flat Earth News by Nick Davies and I saw</p> <p>22 a wealth of material there, ample prima facie evidence</p> <p>23 for all sorts of wrongdoing in the British press,</p> <p>24 particularly in the tabloids, and no one else was</p> <p>25 following this up, and I just thought it was a very kind</p> <p style="text-align: center;">Page 7</p>
<p>1 we'll deal with it then.</p> <p>2 Can I ask you, pleasure, to turn to the first</p> <p>3 page of your witness statement. I want to ask you very</p> <p>4 briefly about your background. Paragraph 1, you confirm</p> <p>5 that you've been working in the British film industry</p> <p>6 for about 12 years. In your 20s, you produced a series</p> <p>7 of independent feature films with Richard Jobson,</p> <p>8 Sixteen Years of Alcohol in 2002, nominated for five</p> <p>9 independent British film awards -- and you won two --</p> <p>10 a number of other films, including The Purifiers and</p> <p>11 A Woman in Winter. You then went on to direct the</p> <p>12 feature documentary Taking Liberties, about how the</p> <p>13 Blair government eroded civil liberties under the guise</p> <p>14 of the war against terror. That was released in 2007.</p> <p>15 It was nominated for a film BAFTA in 2008 for best first</p> <p>16 time writer/director and was screened on More4 in the</p> <p>17 True Stories strand. Is that correct?</p> <p>18 A. That is correct. I think they're called British</p> <p>19 Independent Film Awards. I've just noticed that error.</p> <p>20 Very upset about that.</p> <p>21 Q. We're going to show an extract from the film Starsuckers</p> <p>22 in just a moment. Let me ask you about now how you came</p> <p>23 up with the idea, if I can. You refer to this at</p> <p>24 paragraphs 2 and 3, but perhaps in your own words, if</p> <p>25 you could just tell us why you decided to make the film</p> <p style="text-align: center;">Page 6</p>	<p>1 of fertile area to make a documentary about.</p> <p>2 Q. You tell us at paragraph 4 that you made the film over</p> <p>3 a period of two years and you released it in 2009;</p> <p>4 that's correct? And you go on to tell us that the</p> <p>5 chapter that's of most relevance to this Inquiry is the</p> <p>6 section on the news media, and that lasts approximately</p> <p>7 30 minutes.</p> <p>8 A. Mm-hm.</p> <p>9 Q. We'll come onto that. We will show that, but if I can</p> <p>10 break it down this way. There seem to be four</p> <p>11 particular areas that this part of the film covers:</p> <p>12 paparazzi, and the way that they operate; secondly</p> <p>13 fabricated, inaccurate stories; thirdly, kiss-and-tells,</p> <p>14 we'll see in a moment, and then fourthly, what you</p> <p>15 describe, I think, as criminality of the tabloids. This</p> <p>16 is also referred to as the medical records sting.</p> <p>17 A. Mm-hm.</p> <p>18 Q. The film will be self-explanatory. Before we go on to</p> <p>19 show that, I'd just like you to explain whether you</p> <p>20 tried -- before exposing the tabloids in the way that</p> <p>21 the film does, did you ever try to speak to any of the</p> <p>22 journalists or any journalists on the record about their</p> <p>23 working practices?</p> <p>24 A. Absolutely. I mean, we tried extensively for well over</p> <p>25 two years to try and get people to go on record and tell</p> <p style="text-align: center;">Page 8</p>

<p>1 us what really goes on in tabloid newsrooms, and I think 2 that the public at large had a right to know that, 3 because the public pay for news through their -- the 4 cover price and through absorbing advertising, but are 5 pretty much left in the dark as to the veracity of the 6 stories and the techniques used by the journalists to 7 acquire them, and we asked -- I couldn't give you an 8 exact figure, but I'd say definitely probably about two 9 dozen people to go on record. We put in formal requests 10 to all sorts of publications and were turned down. 11 I remember particularly the Express and Northern & Shell 12 said they had a blanket policy of no filming anywhere 13 the buildings ever, for example, and I believe the same 14 is true of Wapping.</p> <p>15 And we're not the only people to have tried it. 16 I mean, many people over the years have tried to make 17 documents about what life's like -- you know, how the 18 tabloids operate, and they have a very strict sort of no 19 filming policy, and even to the extent where you -- very 20 rarely do you get journalists and editors and 21 proprietors even going on record. So you don't have the 22 editor of the Sun going on the Today programme to defend 23 themselves. It as kind of -- I think this has changed 24 now after the death of the News of the World, but there 25 was this kind of brick call wall, this sort of fortress</p> <p style="text-align: center;">Page 9</p>	<p>1 Would you like to give us a bit of an introduction or 2 should we just show the film? 3 A. I think just -- I'll quickly run through each one 4 because if you look at the paparazzi, there's 5 actually -- in the course of making a documentary like 6 this, you film over two years so you collect a vast 7 amount of material and only a fraction actually goes 8 into the film and it's my job as director to decide what 9 goes in and what goes out. There's various things -- if 10 I was making the film specifically for the Inquiry, 11 I might have made it differently, because there's lots 12 of material that we sort of found when the Inquiry was 13 announced we thought might be of interest. So for 14 example, with the paparazzi section, there was a guy 15 called Owen Beanie who ran -- I think he still does 16 run -- World Entitlement News Network and I got him to 17 speak very candidly about the Britney Spears situation, 18 which then was sort of exploding in Los Angeles. 19 I won't read it all out, but there's a section here in 20 the transcript which I think is worth reading about how 21 they actively misrepresent situations, and in Spears' 22 case was trying to make her out to appear suicidal and 23 were happily selling these images and the story attached 24 to all British news outlets. And not just the tabloids; 25 everyone was buying these images.</p> <p style="text-align: center;">Page 11</p>
<p>1 mentality, that you don't explain yourself, you don't go 2 on record, you don't discuss these things.</p> <p>3 Q. In the light of that blanket refusal, what did you 4 decide to do?</p> <p>5 A. We decided to use subterfuge, being the only sort of 6 option left available to us, and we think in each case 7 the subterfuge was proportionate to what it was we were 8 trying to expose, and we knew when we were making the 9 documentary, especially given the experience of my 10 previous documentary, Taking Liberties, that we 11 definitely wanted this to appear to television. So we 12 set ourselves a very high professional ethical standard 13 because we knew that it would have to go through an 14 Ofcom audit and -- we'll come to this later but the 15 regulations in Ofcom are sort of much, much higher than 16 they are for the press, so we knew it had to withstand 17 that, but we set about using various means of subterfuge 18 in the public interest to investigate how the tabloids 19 behaved.</p> <p>20 Q. Did you have legal advice before --</p> <p>21 A. We had extensive legal advice throughout that continues 22 to this day, but yes, we took extensive legal advice.</p> <p>23 Q. Would you like to explain a little bit about what you 24 were doing in each of those: paparazzi, fabricated 25 stories, kiss-and-tells and the medical records sting.</p> <p style="text-align: center;">Page 10</p>	<p>1 The point we make obviously when we look at Kev the 2 pap in Soho is that essentially the people were accusing 3 Pete Docherty of a crime which he wasn't. The bit that 4 got us the most attention is the fake stories, and 5 I think the fundamental question there is: will tabloid 6 journalists check facts? That was kind of our initial 7 decision when we went out to do that.</p> <p>8 And kiss-and-tells -- again, it was something that 9 we had a huge amount of off-record information about, 10 how kiss-and-tells are actually engineered by the 11 tabloids and how they have this sort of 12 ever-replenishing army, shall we say, of kiss-and-tell 13 girls who essentially almost sort of -- not sent out, 14 but targets are suggested to them. So they'll know if 15 they sleep with a certain celebrity, they'll get 16 a certain amount of money, but we weren't able to put as 17 much of that in as we wanted because a lot of the 18 information wasn't particularly reliable because of the 19 nature of the sources.</p> <p>20 But yes, then with the medical records sting, we 21 were essentially looking just to see if tabloid 22 journalists would act within the law when it came to 23 sourcing stories. So that's the set-up of what we're 24 about to see.</p> <p>25 Q. We're just going to show a very short clip on</p> <p style="text-align: center;">Page 12</p>

<p>1 churnalism. Can you tell us what churnalism is?</p> <p>2 A. I think the phrase was coined by Nick Davies, which is</p> <p>3 this process by which a press release will be</p> <p>4 regurgitated as news and how public relations has</p> <p>5 managed to infiltrate all parts of the British news</p> <p>6 media. Nick Davies and I think Aberystwyth University</p> <p>7 did a study and they found that 54 per cent of news</p> <p>8 articles in the national media are wholly or partly</p> <p>9 sourced from public relations, and public relations is</p> <p>10 essentially there to not serve the interests of the</p> <p>11 readers and viewers; it's there to serve the interests</p> <p>12 of the advertiser or the politician or whatever it is.</p> <p>13 What happens is people write a press release and</p> <p>14 they send it in to the newspaper and the newspaper cuts</p> <p>15 and pastes that and puts it as a news article and</p> <p>16 presents it to the public as news that's been sourced</p> <p>17 and verified and everything else, when of course it's</p> <p>18 nothing of the sort.</p> <p>19 So the Media Standards Trust came up with this</p> <p>20 rather clever idea for a website called churnalism.com,</p> <p>21 where people could insert press releases and find out</p> <p>22 which news articles had been cut and pasted from those</p> <p>23 press releases. They wanted to publicise it and they</p> <p>24 came to me and said, "Would you help? Would you do some</p> <p>25 hoaxes?" I seem to have this reputation now as a sort</p> <p style="text-align: center;">Page 13</p>	<p>1 it's there. You can read it or not but --</p> <p>2 LORD JUSTICE LEVESON: Thank you very much. That's the</p> <p>3 confirmation I wanted.</p> <p>4 MS PATRY HOSKINS: Sir, once the two clips finish,</p> <p>5 apparently we will need to rise for a very short time</p> <p>6 while we ensure that the feed is back on; is that right?</p> <p>7 LORD JUSTICE LEVESON: Because the film isn't going</p> <p>8 anywhere.</p> <p>9 MS PATRY HOSKINS: The film isn't going anywhere, but the</p> <p>10 audio will need to be switched back on once the film</p> <p>11 has been shown.</p> <p>12 LORD JUSTICE LEVESON: Right.</p> <p>13 MS PATRY HOSKINS: Don't ask me any difficult questions</p> <p>14 about that, please.</p> <p>15 (Starsuckers Media Section DVD is shown)</p> <p>16 (Churnalism Short Film DVD is shown)</p> <p>17 MS PATRY HOSKINS: Sir --</p> <p>18 LORD JUSTICE LEVESON: Do you want to put the audio back on?</p> <p>19 MS PATRY HOSKINS: It will just take a few minutes, as</p> <p>20 I understand it.</p> <p>21 LORD JUSTICE LEVESON: All right.</p> <p>22 (2.53 pm)</p> <p>23 (A short break)</p> <p>24 (3.00 pm)</p> <p>25 MS PATRY HOSKINS: Thank you very much indeed, sir. I think</p> <p style="text-align: center;">Page 15</p>
<p>1 of hoaxer but I do actually do lots of other work. And</p> <p>2 I thought it sounded like a great idea, so we basically</p> <p>3 created a series of fake press releases and sent them</p> <p>4 into news rooms to see which ones would get picked up.</p> <p>5 That was earlier this year.</p> <p>6 Q. I will ask you about that in more detail.</p> <p>7 A. Okaying.</p> <p>8 Q. If we just show the extract.</p> <p>9 LORD JUSTICE LEVESON: Just before you do, you've said</p> <p>10 something which was something of a tease. You said that</p> <p>11 if you'd been making the film for the Inquiry, you might</p> <p>12 have put some different material in than you did in fact</p> <p>13 put in.</p> <p>14 A. Mm.</p> <p>15 LORD JUSTICE LEVESON: You said that some of it you'd</p> <p>16 included in your statement, and the statement is there</p> <p>17 for us to see. But do I gather from that that there is,</p> <p>18 on some cutting room floor, a great deal of other</p> <p>19 material which is relevant to the circumstances of the</p> <p>20 Inquiry?</p> <p>21 A. I like to think I've been working quite hard at this, so</p> <p>22 I'd like to think that everything I think is relevant to</p> <p>23 the Inquiry is in my statement and in the annexes as</p> <p>24 well. There are some extensive annexes. The letter</p> <p>25 from Bob Geldof, for example, runs to 6,000 words and</p> <p style="text-align: center;">Page 14</p>	<p>1 now the audio feed is back on. Hopefully no camera,</p> <p>2 just audio.</p> <p>3 LORD JUSTICE LEVESON: Right.</p> <p>4 MS PATRY HOSKINS: Mr Atkins, come back to my questions.</p> <p>5 I am going to deal briefly first with the paparazzi.</p> <p>6 We've seen the excerpts from the film dealing with that.</p> <p>7 I don't want to dwell on it for too long but if you look</p> <p>8 at paragraph 10 of your statement, you explain you</p> <p>9 approached Mr Beanie of WENN and he allowed you to</p> <p>10 accompany some of his photographing when they were</p> <p>11 following Britney Spears?</p> <p>12 A. Yes.</p> <p>13 Q. This was a time of great turmoil for Ms Spears, as we</p> <p>14 know, and you say you saw repeated incidents of</p> <p>15 paparazzi breaking the law, including life-threatening</p> <p>16 dangerous driving, trespass, breaking and entering and</p> <p>17 violence. Can I just assume for the moment that this</p> <p>18 all took place in the United States?</p> <p>19 A. Yes.</p> <p>20 Q. We know that you followed Kevin Rush, the paparazzo, in</p> <p>21 the UK, but did you ever witness any of that type of</p> <p>22 behaviour in the UK?</p> <p>23 A. I need to be careful what I say. Not as bad, but</p> <p>24 certainly dangerous driving is an absolute given for</p> <p>25 paparazzi. Violence, yes. It's a very tough world,</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 especially now that everyone has a mobile phone and can 2 take pictures. You see lots of people who aren't really 3 trained photographers kind of converging around 4 celebrities and celebrities themselves -- sorry, 5 paparazzi get very angry that members of the public are 6 stealing their income. But you also see it the other 7 way around. You see members of the public getting angry 8 at paparazis for trailing the celebrities, so we did 9 see quite a bit of violence, but not anything as bad as 10 the Britney Spears situation. 11 Q. Before I turn away from the paparazzi part of your 12 witness statement, is there anything that you'd like to 13 say? 14 A. No, I think it's all covered in this. 15 Q. The second thing I want to ask you about is the fake 16 stories or the accuracy of tabloid journalism. This 17 part of your witness statement starts at paragraph 17. 18 We saw, when we saw the extract of the film, what you 19 were trying to do. A researcher from your team would 20 ring up one of the tabloids and give an entirely false 21 or partly false story and then you would wait to see 22 whether it would be picked up and then printed in that 23 particular tabloid the next day. Have I summarised that 24 accurately? 25 A. Yes, yeah, that's about right. The entirely false --</p> <p style="text-align: center;">Page 17</p>	<p>1 that my researcher had kind of had all the fun, so 2 I thought I'd try one and we tried a story about 3 Alan Sugar which wasn't run, but we subsequently 4 discovered that he was very litigious, so they -- 5 basically, tabloids don't like running stories about him 6 that isn't PR for The Apprentice, but yeah, of the six 7 that Jenn created and fed through through that two-week 8 period, they were all run by at least one tabloid. 9 Q. You tell us at the second of the paragraph 22s that your 10 biggest story was in the Sun, revealing that Sarah 11 Harding from Girls Aloud was secretly a fan of quantum 12 physics. We saw that obviously in the film as well. 13 You say it ran as a lead story in Gordon Smart's Bizarre 14 column and there was a fabricated quote: 15 "There's a lot more going on under that blonde 16 barnet than Sarah's given credit for. She's a smart 17 cookie and does read an awful lot." 18 You say that this quote didn't come from Jenn, your 19 researcher? 20 A. No. 21 Q. Showing that the Sun will add fictitious quotes into 22 their articles as well as not running basic checks. 23 Now, I've been asked to put to you that the Sun did in 24 fact check the story with her PR and it was the PR who 25 gave them that quote. Do you have anything to say?</p> <p style="text-align: center;">Page 19</p>
<p>1 what we did is we researched the celebrity's location, 2 so -- and that actually we did quite often from the 3 tabloid newspaper's website itself. So where they were 4 was correct and everything else was fictitious. 5 Q. So that the story would have a ring of truth? 6 A. Yeah, it would also be able to be sort of checked within 7 the realms of the information that was already in the 8 public domain. Although something that did happen while 9 we were doing it -- we didn't even run this story, but 10 I think the Metro managed to have Bono on both sides of 11 the Atlantic at the same time, so even outside of what 12 we were doing, we could see that that didn't always 13 stack up for the news desk. But yeah, we decided to 14 stick with location, and everything else above that was 15 fantastical. 16 Q. There are actually two paragraph 21s of your statement, 17 I have noticed. 18 A. I'm sorry about that. 19 Q. The second of the two, top of the second page there, you 20 say that you created six celebrity stories and you fed 21 them to the newspapers over a two-week period. 22 A. Yes. 23 Q. Were there any more or is that it? 24 A. Yeah, if you look at paragraph 23, I tried -- I think it 25 was actually a little later. I was actually annoyed</p> <p style="text-align: center;">Page 18</p>	<p>1 A. I find it a staggering coincidence and remarkably 2 convenient, shall we say, for the Sun newspaper to come 3 up with that, and it's the first I've heard about it and 4 they've had two years to sort of make a mention of this. 5 And certainly at the time, when the Guardian put this 6 story to them, they didn't say that. In fact, they 7 actually said, "Look, look, it's true, it's in our 8 newspaper, and look, it's all over the Internet", 9 without realising that actually it was us and them that 10 had put it there, so yes, I find that a remarkable 11 coincidence that they've managed to come up with this. 12 Q. I hear some whispering. Just give me a moment. I don't 13 think I need to ask you anything else about that. 14 I'll ask you now about the Guy Ritchie story we saw 15 on the film, the juggling cutlery in Scott's restaurant. 16 A. Indeed. 17 Q. Again, I have been asked to put to you that most of that 18 story was in fact true. It was true that he'd been at 19 Scott's; is that right to the best of your recollection? 20 A. I mean, as to whether it's true or not, we read in the 21 Sun that he was at Scott's so -- we don't know whether 22 he was there or not, but yes, in our story we said that 23 Guy Ritchie had been seen at Scott's by Jenn, who was 24 pretending to be a waitress, yes. So that element we 25 believed was true.</p> <p style="text-align: center;">Page 20</p>

<p>1 Q. And it was true that he'd been drinking that evening? 2 A. People do drink in restaurants, yes, I'm sure. 3 Q. And it was also true that he had a black eye? 4 A. He didn't actually have a black eye. He had a very 5 slight mark on his cheek which I noticed in a photo, so 6 we thought how -- we wanted to riff on that and thought: 7 "Okay, where did he get it from?" Tabloid journalism is 8 always about continuing the narrative, so I think the 9 Sun had already reported that Guy Ritchie had been in 10 the restaurant, so they were obviously looking for 11 something to spin it along further. So we came up with 12 the story that he had been juggling cutlery, which of 13 course he hadn't. I don't know how you juggle cutlery. 14 It's a ridiculous thing to do. That bit we invented, 15 but I don't think he actually had a black eye; he just 16 had a very small mark on his cheek in the photograph. 17 Q. I have been asked to put to you that they did check the 18 story with a source and the source confirmed that he'd 19 been at Scott's, that he had been drinking and that he 20 did have a black eye and therefore did do just what you 21 would suggest they did, they did check their facts. 22 A. I think they checked their own website, which is exactly 23 the same thing we did, but the crucial -- people go out 24 every day, people drink every day, people go to 25 restaurants every day. People do not juggle cutlery and</p> <p style="text-align: center;">Page 21</p>	<p>1 A. They were run in the celebrity pages. I don't know if 2 they're necessarily called the gossip pages. To my 3 mind, from what I remember of those stories, they were 4 presented to their readers as fact. There wasn't a "we 5 hear that". They were presented as an absolute sort of 6 direct piece of actuality. I suppose the question is 7 would you -- if Gordon Smart put under his byline or his 8 rather large photo in the Bizarre column "probably not 9 true", then we probably wouldn't be so concerned about 10 hypocrisy, but whenever these journalists go on record 11 and talk about their craft, they talk about it as though 12 it has like the same rigours of all the rest of their 13 journalism. 14 In fact, there was a quote from Dominic Mohan, who 15 is the editor of the Sun to this Inquiry -- he stood up 16 and made is speech and said: 17 "The way showbiz journalists operate is like a 18 political journalist in the lobby." 19 So he seems to be making a direct comparison, to my 20 mind, between the rigours of political reporting as he 21 is with his celebrity reporting. So they're presenting 22 these stories as fact. And also, celebrity stories 23 dominate these newspapers. I think it's no longer the 24 case that you have the gossip pages anymore. You buy 25 a copy of the Sun or the Star -- celebrity is</p> <p style="text-align: center;">Page 23</p>
<p>1 stab themselves every day. So they didn't check what 2 I would say is the ridiculous, fantastical bit of the 3 story; they just checked where he was, and he had been 4 in a restaurant and he might have had a glass of wine. 5 All that was known from their own website. But the 6 absurd part of the story, they just wrote down and put 7 in their paper without checking. 8 Q. If we look at paragraph 24 of your statement, you tell 9 us what we can conclude from this evidence. You say: 10 "We concluded from this evidence that chequebook 11 journalism is structurally designed to produced 12 exaggerations and distortions. Celebrities are usually 13 fairly dull people, particularly footballers and actors, 14 who rarely do anything particularly newsworthy. 15 Conversely, the more unusual or funny the story, the 16 more valuable it becomes. Those selling celebrity 17 stories are obviously motivated by profit rather than 18 accuracy, and will be naturally inclined to exaggerate 19 and distort the truth in order to make more money from 20 the newspaper paying them." 21 Can I ask you this: these stories were all 22 published, by and large, in the gossip sections of 23 newspapers. Is there any problem, Mr Atkins, with the 24 reporting of stories as gossip if stories aren't 25 defamatory or malicious?</p> <p style="text-align: center;">Page 22</p>	<p>1 throughout, and this is what we were sort of looking at 2 in the film, is how it has kind of spread to all 3 different parts of the news media, taking these sort of 4 lax standards of fact-checking with them. 5 Q. I think I understand the point. Is your view then that 6 newspapers should be prevented completely from printing 7 gossip or rumour which they cannot check factually? 8 A. Gossip is -- I have several pages of notes on gossip. 9 Gossip and rumour can be very damaging, and it can ruin 10 lives, especially if it's not true, and I think we rely 11 on journalists to sift through gossip and rumour and 12 tell us what they think is true. If you're spending 13 50 pence or whatever on a newspaper, you're hoping that 14 many so of that money has gone towards someone doing 15 some basic checks. If you want wild, unsubstantiated 16 rumour, we have Twitter, and I think journalism is all 17 about verification. It's an absolute bedrock of what 18 I think most people in the country think journalists do 19 is to check and verify and see if things stand up. And 20 if you put a rumour in a newspaper, you're giving it 21 credibility just by printing it. 22 Q. But isn't the great British public able to decide for 23 itself what they think might be rumour and what is real 24 news? 25 A. But if we said, "Chris Atkins denied rumours that he's</p> <p style="text-align: center;">Page 24</p>

<p>1 having an affair", straight away you've put the concept 2 of me having an affair into the public, and 3 a proportion, maybe lots of the public, will now think 4 that I'm having an affair just because a newspaper has 5 printed that. And it's a very kind of underhand way, 6 I think, often of slipping stories out into the public 7 that they can't stand up, and they can't stand up 8 because they might not be true. So let's just call it 9 at that rumour, some are saying. Well, how do you 10 define rumour? Is it four people in the newsroom reckon 11 it might be true? "Let's call a rumour, let's whack it 12 in." That's someone's life ruined. 13 And I find that sometimes rumour is used as a cover 14 for getting, as I say, stories out there that don't have 15 any factual backing. I think some of the reporting in 16 the Chris Jefferies case, a lot of that was rumour and 17 insinuation. That demolished a man's life. It's 18 a smear campaign. So I think rumour, one has to be 19 extraordinarily careful with it and I think newspapers 20 should be very careful with using rumour, but often 21 they're not. 22 Q. One of the solutions that you suggest in your witness 23 statement is that what they should have done in each 24 case is to check with the respective celebrities PR at 25 the very least, but then you go on complain later on in Page 25</p>	<p>1 news standards spread throughout the newspapers and 2 I think they spread with the journalists who practice 3 them. So you have -- when journalists start on tabloid 4 newspapers -- and again Richard Peppiatt has helped 5 confirm this. They often start to the celebrity desks. 6 It's often one of the first jobs they have. If they 7 thrive there, and if they thrive there by not checking 8 facts, and in some cases even fabricated details -- the 9 Daily Star added to our Amy Winehouse story that 10 a friend of Amy's ran in and punched her in the head to 11 put out the blaze, and that was just -- that didn't come 12 from us and I don't think that was given by a PR. So 13 they'll fabricate quotes, they won't check facts, 14 they'll add their own details to it, and if they're 15 successful on the celebrity desks in this regard, their 16 behaviour isn't punished; it's rewarded. And quite 17 often they get promoted to other parts of the newspaper 18 where they have far more control and impact, and in the 19 film we gave three examples: you know, Piers Morgan, 20 very successful celebrity journalist, went on to run the 21 Mirror and then had to leave his job rather abruptly 22 because they didn't properly check their facts over some 23 photos of British soldiers apparently abusing Iraqi 24 prisoners, which of course was nonsense. 25 Then you look at Andy Coulson. Well, he was a very Page 27</p>
<p>1 the film that PRs are guilty of essentially mass 2 deception. So how do you match the two? 3 A. I don't necessarily -- it doesn't necessarily have to be 4 with the PR. It could be with an agent, and even 5 though, yes, PRs are inherently unreliable, at least 6 that's a check. At least a phone call has gone through 7 and you would hope that the people that they're checking 8 it with are acting in the best interests of the 9 celebrities, maybe even call their lawyer, maybe even 10 call them. But the fact that no checks were made, even, 11 as I say, to a PR, it shows that these newsrooms are 12 just -- as I said, we called them up, we gave them 13 fantastical lies, and they wrote them down and put them 14 in their newspaper the next day, without anyone calling 15 up and asking anyone whether or not it might be true. 16 So yes, I'd be the first person to say that PRs are 17 sometimes unreliable as a source of truth, but in that 18 instance they're probably better than nothing. What we 19 got were nothing. 20 Q. Some might say that the stories that you planted were 21 harmless, didn't hurt anybody's feelings, just a bit of 22 gossip, the public are able to tell the difference 23 between a bit of gossip and some real news. No? Any 24 thoughts on that? 25 A. I think one of the problems that we have is how these Page 26</p>	<p>1 successful gossip -- celebrity journalist and I don't 2 need to tell anyone in this Inquiry where he ended up. 3 And same with Dominic Mohan who is now running the Sun. 4 So I think that people learn their journalistic craft on 5 the celebrity desk and then, if they're successful, very 6 quickly move on to other areas. Richard Peppiatt was 7 telling me that someone would be writing -- at the Daily 8 Star, one day they would be writing a sorry about 9 Bubbles giving evidence at the Michael Jackson trial, 10 and the next day they would be writing a story about 11 global warming. And it's the same journalists with the 12 same ethical values covering both. 13 Q. Why do so many tabloid editors come from the showbiz 14 desks? 15 A. Celebrity stories are massively commercially successful. 16 They are the single most successful stories in 17 newspapers. They boost circulation, they increase 18 clicks on websites. So if you are adept at handling 19 showbiz stories, you will rise up the career ladder at 20 a tabloid newspaper. Gordon Smart has just been 21 apparently voted -- recently, about a year ago, after 22 Starsuckers, was voted the number one celebrity 23 journalist of the year, and second was Clemmie Moodie at 24 the Mirror, and both of them ran our stories. So you 25 can see that if they just stuck to printing what was Page 28</p>

<p>1 rigorously factually true, it would be really dull news 2 articles, so they want to add the spice and the sparkle 3 and the extra fluff around the edges to make the stories 4 more appealing. Those who stick to the facts aren't 5 going to succeed.</p> <p>6 Q. Let me move on to churnalism. Again, I'll do this 7 briefly because it's extensively covered in the clips 8 that we've seen. We saw the extract about the chastity 9 garter and you explained in the film, I think, that it 10 was published on the Mail Online and in the Daily Star, 11 that story. That's right, isn't it?</p> <p>12 A. Mm.</p> <p>13 Q. The Daily Mail wanted me to point out -- and I think 14 this was confirmed by your clip, wasn't it -- that the 15 story was pitched originally to the Daily Mail news 16 desk, it was rejected, but then once you had fed it 17 through to the news agency, they then picked it up and 18 it was then that it was published online; is that right?</p> <p>19 A. Absolutely true. I make that point to show how 20 important news agencies are in this whole machine. It's 21 the same with PR. I don't think you can just say, "Oh, 22 it's a newspaper, let's look at the newspaper." They 23 have these other things sitting behind them and one much 24 them is news agencies. There's quite a lot of local 25 news agencies in Britain that basically feed stories</p> <p style="text-align: center;">Page 29</p>	<p>1 the most-read article on the Daily Mail's website for 2 quite some time -- I think the news agency, sniffing 3 some money, came back to us and said, "Could we do an 4 interview? Could we speak to the husband and wife as 5 a follow-up article, maybe sell it for the women's 6 magazines?" And we looked at this and thought while it 7 might be quite good fun, it wasn't actually in the 8 interests of what we were trying to prove with the hoax, 9 so we said no. I think they're probably getting 10 confused with that. But no, at the time we sent it to 11 Caters, they copy and pasted it into the wire and sent 12 it to London, all in a matter of hours, with no checks.</p> <p>13 Q. Are you saying, Mr Atkins, that newspapers should never 14 use copy provided by PR? Isn't that unnecessarily 15 pedantic in your view?</p> <p>16 A. I think if a news article is based, more than half the 17 news article, on a press release, I think the public has 18 a right to know that. Again, the public is trusting 19 journalists to give them an objective look at what is 20 true and what's not, and if they're just copying and 21 pasting huge chunks from a press release in five 22 minutes, that's -- they're failing in their job.</p> <p>23 You have advertorials in newspapers and you have 24 a full page that is sort of promoting Coke or whatever, 25 and because it's sort of advertising looking a bit like</p> <p style="text-align: center;">Page 31</p>
<p>1 into the national press, and that's what we found, this 2 agency called Caters News Agency, which, as far as I can 3 understand, is just a couple of people sitting in an 4 office in Birmingham.</p> <p>5 After the Mail said no to this story, for whatever 6 reason, we sent exactly the same story to Caters News 7 Agency, and within minutes they'd put it on a newswire 8 and sent it back down to the Mail, who then -- word for 9 word, identical story -- then said, "Oh, it's on a news 10 wire, it must be true", and then copied and pasted it 11 onto their news site. This all happened extremely 12 quickly, within hours.</p> <p>13 Q. That begs the question: did the news agency take any 14 time to check its facts?</p> <p>15 A. Absolutely not, no. They said, "Great, let's run it", 16 I think. I might even have the emails.</p> <p>17 Q. I've been asked to ask you whether you're aware that the 18 agency spoke to the alleged husband and wife team who 19 had come up with this invention of the chastity garter. 20 Is that right?</p> <p>21 A. Absolutely not, no. It was a handful of words email. 22 I can dig up the correspondence if you want, but it was 23 like: "Great, we'll whack it on the wires." It was 24 something like that. I think after the event, after 25 they saw how successful the story was -- because it was</p> <p style="text-align: center;">Page 30</p>	<p>1 a news article, you have to put "advertorial" on the 2 top. My understanding is that regulation is quite old, 3 and I think the same thing should apply to PR. PR, 4 press release, is just a very good way of circumventing 5 that rule. So what you'll do is you'll get a newspaper 6 article, you'll read it, and think, "This journalist 7 really thinks that Tesco is an amazing supermarket", or 8 whatever it is, but the public won't know that all of 9 that story, all that copy, all those photos, have 10 actually been provided by the supermarket.</p> <p>11 So I think 50 per cent is a good arbitrary tipping 12 point. When it goes over there, it's the public's right 13 to know. It doesn't say you can't run the article. It 14 just means you just have to be honest about its source.</p> <p>15 LORD JUSTICE LEVESON: Is it a question of labelling? In 16 other words, for this stuff, you know: "The material 17 provided by the manufacturer tells us that..."</p> <p>18 A. Yeah.</p> <p>19 LORD JUSTICE LEVESON: For the celebrity stuff, it is: 20 "We've received an anonymous tip-off that ..." I'm not 21 suggesting the words, but is it more than labelling?</p> <p>22 A. No, I think, as you said, the public are smart. I don't 23 want to denigrate the public too much, but I read 24 newspaper articles that I know are sourced from PR 25 because I can see it, I spent so long looking at it.</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 I still read the article because I'm actually interested 2 in this product or this film or this service or this 3 government press release or whatever. I'm still 4 interested. It's just I can make a more accurate 5 assessment of how much I take it on board, knowing its 6 source, so I think absolutely with press releases, just 7 say advertorial or churn or from Bell Pottinger or 8 whatever it is, and then the public can make their own 9 mind up.</p> <p>10 MS PATRY HOSKINS: All right. I'm going to turn on to the 11 medical records sting, if I can. Let's start with the 12 basis for it. It's paragraph 30 onwards of your 13 statement in case you want to find where we are.</p> <p>14 A. Yes.</p> <p>15 Q. You say at paragraph 31 that what you wanted to do was 16 to test the Sunday tabloids to see if their journalists 17 were willing to break the law and the PCC code to obtain 18 private information about celebrities that was not in 19 the public interest.</p> <p>20 A. Mm.</p> <p>21 Q. Just to make it clear, you did not have any real 22 confidential information to sell, did you?</p> <p>23 A. None whatsoever, no. It was all fictitious.</p> <p>24 Q. You explain that you would pose as an intermediary who 25 was selling the details of celebrities' plastic surgery</p> <p style="text-align: center;">Page 33</p>	<p>1 offer would be in breach of the PCC code?</p> <p>2 A. Yes. There was actually quotes and I came back to this 3 before, but Paul Dacre, in his capacity of, at the time, 4 the chair of the Editors' Code of Ethics on the PCC, 5 went before Parliament and discussed --</p> <p>6 Q. Paragraph 34.</p> <p>7 A. Yes, 34, 35 -- in which this was discussed and he 8 said -- Alan Keen, who I think was an MP: 9 "Do you think the public is entitled to any privacy. 10 You have explained one or two examples. Medical 11 records." 12 Mr Dacre: 13 "Absolute privacy guaranteed. It's part of the PCC 14 code. No question." 15 Alan Keen: 16 "Medical records?" 17 Mr Dacre: 18 "Absolutely."</p> <p>19 Q. Lets turn to what you did. At paragraph 36 you explain 20 this succinctly. To initiate the investigation, 21 20 March 2009, you called the news desks of The Sunday 22 Express, The News of the World, The Sunday Mirror and 23 The People. We've obviously seen extracts of the 24 telephone calls and of the meetings with various 25 journalists in the film, so we can probably take this</p> <p style="text-align: center;">Page 35</p>
<p>1 operations but was ignorant of the rules of modern 2 tabloid reporting. You would claim that you were the 3 ex-boyfriend of a nurse who worked in a plastic surgery 4 clinic who had evidence of high profile celebrities 5 having operations. You say: 6 "Given the intrusive nature of the stories, the 7 newspapers would be likely to need to obtain proof that 8 the stories were true in order to print them. Any such 9 proof would inherently involve a breach of the Data 10 Protection Act, which prohibits the sale of medical 11 records. Even harvesting information to research the 12 stories would ostensibly involve a breach of the DPA." 13 Did you take legal advice to that effect before you 14 carried out --</p> <p>15 A. Yes.</p> <p>16 Q. You go on to say: 17 "The DPA does have a general opt out for journalists 18 when the information is in the public interest ... so we 19 deliberately created stories that, while of interest to 20 tabloid readership, could never be classed as being in 21 the public interest. The PCC code also makes it clear 22 that health issues are extremely sensitive." 23 And then you set out the relevant parts of the PCC 24 code. Again, did you get advice on whether or not this 25 sting or purchasing information that you were going to</p> <p style="text-align: center;">Page 34</p>	<p>1 quite briefly. I just need to ask you a few questions 2 and I have been asked to slow down again, now twice.</p> <p>3 Let's start with the Sunday Express if we can. This 4 is important that we do so. In a nutshell, what did the 5 Sunday Express say when you indicated that you might 6 have confidential medical records for sale?</p> <p>7 A. They categorically said that this was not something they 8 could in any way be involved in, and they didn't even 9 want to hear what the details were, which I thought was 10 quite comforting, actually, to have the Sunday Express 11 say this. But I will just read a quick line from the 12 phone call, because it sums it all up: 13 "From our point of view, there would be three really 14 difficult areas: a privacy side of it -- and there's the 15 privacy side with the fact that it's a health issue, 16 which makes it even more private from her point of view. 17 They would also be regarded as a sort of breach of 18 confidentiality as well, a legal minefield." 19 And pretty much put the phone down.</p> <p>20 Q. Good. Let's turn to The People then, if we can. You 21 spoke to a journalist called Sarah Jellema at The 22 People; is that right?</p> <p>23 A. First of all we spoke to a news editor, Tom Carling, who 24 I understand is still news editor of The People, and he 25 listened to our story first. This is actually in an</p> <p style="text-align: center;">Page 36</p>

<p>1 annex which I supplied to the Inquiry. We explained to 2 him -- I explained to him first what the situation was, 3 and he weighed this up and then put us through to Sarah. 4 Q. Do you want to look at that extract, that transcript of 5 the telephone call? 6 A. Not particularly. I mean, it's just we told him what we 7 were about and he said, "Great", and put us through to 8 the journalist. 9 Q. You then spoke with Ms Jellema. Can I ask you to turn, 10 please, to tab 2 in the bundle. For the technician, 11 it's 49038. If we look at the top half of the 12 page first, you'll see the conversation that you had 13 with Mr Carling. 14 A. Mm-hm. 15 Q. And you see then, about three-quarters of the way down 16 the page, a section that starts: 17 "Well, we're definitely interested in these sort of 18 stories. Obviously, we've got to be very careful 19 with -- you know, there's a new wave of privacy laws, 20 but you know, lots of people in the public eye are quite 21 open about the work that they've done, you know, stuff 22 we can elaborate on, and it does entirely depend on who 23 the individuals are." 24 Anything wrong with that? 25 A. I think what he's opening the door to, as I was going to</p> <p style="text-align: center;">Page 37</p>	<p>1 the supervision of her news desk, it seems to me, so 2 I think that in fairness to her, she was not a rogue 3 reporter in this instance. 4 Q. You then arrange to meet up with her and you do on 5 26 March 2009. The transcript is at tab 4 in its 6 entirety, but it's summarised at paragraph 71 onwards of 7 your statement. 8 A. Mm-hm. 9 Q. It's probably easier if we go through the summary. 10 A. Mm-hm. 11 Q. I'm sure if anyone wants me to add anything, we can come 12 back to it. Could I ask you to draw out for the Inquiry 13 the particular passages that you think are relevant to 14 this issue? 15 A. Sure. Well, her opening remarks: 16 "Obviously, it's very legally dodgy." 17 Which I think is what the Guardian used in its 18 headline when it broke the story. 19 "I was batting around with my news editor who you 20 spoke to before, Tom ..." 21 Which indicates he's sort of across this story. 22 "... sort of ideas of how you might do it, ideas of 23 maybe a spread of silhouettes or people hinting who 24 might have done it." 25 So that, to me, would indicate that they would take</p> <p style="text-align: center;">Page 39</p>
<p>1 come to in a second, is this concept of harvesting. So 2 what he's saying, I think, is to sort of give himself 3 some kind of cover, to say, "Look, there are a new wave 4 of privacy laws" -- well, we all know that -- "and we do 5 need to be careful." Absolutely fine. But he then 6 passes me on to a colleague, who is then instructed to 7 come and meet me and to harvest as much private medical 8 information as they possibly can, so I do -- it's a nice 9 little touch to say, "Oh, got to be careful", but then 10 proceed to action an investigation by his newspaper 11 that, as far as we're concerned, is definitely breaking 12 the rules. 13 Q. You were then passed on to Sarah Jellema on the 14 telephone. I'm going to skip to the fourth page of that 15 exhibit, halfway down the page, where she says: 16 "Yeah, definitely. It sounds like it would be right 17 up our street, to be honest with you, so whereabouts do 18 you live?" 19 And then you arrange to meet her. 20 A. Yeah. 21 Q. Out of fairness to Ms Jellema, is there anything else in 22 that extract from the telephone conversation that you'd 23 like to draw the Inquiry's attention to? 24 A. Not particularly. I think the telephone call is in 25 its entirety, so it's all there. She's working under</p> <p style="text-align: center;">Page 38</p>	<p>1 the information and do a kind of "have they, haven't 2 they?" silhouetted story to shield where the information 3 had come from. So even though they would be in 4 possession of sort of illicit data-protected material, 5 they wouldn't be letting the readership know that's what 6 the source was. 7 And then quite early on: 8 "Obviously as well, the first thing we want to know 9 is what back-up we have. There will be something 10 written or whatever, just something for the file. I'm 11 sure they'll want something, I'm not sure what. Some 12 kind of documentary proof, yes." 13 Paragraph 75 I found interesting. It's not 14 specifically relevant to the breach of the DPA and so 15 forth, but I thought it was quite interesting about how 16 they operate. After I gave them the -- I said a member 17 of Girls Aloud had had a boob job, but I wouldn't tell 18 her which one, so she was obviously desperate to know 19 which one. She said: 20 "Even if it wasn't Cheryl [Cheryl being the most 21 famous one] you could do a teaser on the front and 22 people wouldn't know until they got inside. So you 23 wouldn't even put a name on the front. You'd go 'Girls 24 Aloud'. But if it wasn't, they'd do a teaser and 25 everyone would be like: 'Oh, is it Cheryl?'"</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 Which, to me, I think, indicated that they were 2 essentially looking at tricking the readership, so even 3 if it turned out -- 4 Q. By doing what? 5 A. By hinting that it's Cheryl, by knowing the readership 6 will think that it's Cheryl and they buy the paper from 7 the front page. They buy the paper and they get home 8 and it's not Cheryl, by which time they've already spent 9 their money. 10 So just a little bit further on, paragraph 77: 11 "I spoke to them [presumably the news desk] before 12 I came down. They wanted names." 13 This, I think, comes to the heart of this, and also 14 what we were talking about when we come to the 15 News of the World journalists. This idea of collating 16 the information. So even without them printing it, by 17 taking the information wholesale from us and taking it 18 back to their news desk where, presumably, they store it 19 and keep it on file, they are breaching the Data 20 Protection Act, just by me verbally imparting the 21 information, and those breaches do not have any public 22 interest and from the data protection point of view, 23 they're trying to become the data controller. They're 24 trying to essentially have a pipeline from our clinic to 25 their news desk, so anyone coming into that clinic with Page 41</p>	<p>1 say to that? 2 A. It sounds like what journalists put in their Twitter 3 bios, doesn't it? "All views are mine and not that of 4 my newspaper". As I say, it's just a rare glimpse of 5 honesty, of how journalists view their regulator. I'm 6 not saying every single journalist believes that, but as 7 I say, where we were unable to get anyone to go on 8 record, then these comments, I think, are still quite 9 valuable. 10 Q. You say at paragraph 79 that the following week 11 Ms Jellema called you, left a voicemail? 12 A. Yeah. 13 Q. "The message said that they were very keen to do the 14 stories, she had consulted with her news desk and legal 15 team and they had asked her to ask us to provide a copy 16 of the appointments book of the surgery or similar to 17 prove that celebrities had been in and what they were 18 for." 19 Again, you say you'd seen Ms Jellema's statement to 20 the Inquiry. 21 A. Yeah -- you'll -- I don't -- 22 Q. She says she returned to the office, reported back to 23 the news desk and was told that The People would not 24 pursue this any further. She then called you and left 25 a voicemail message to that effect. What's your Page 43</p>
<p>1 any kind of surgery, they want that information, and 2 they later decide whether or not -- which completely 3 goes against the point of the Data Protection Act. 4 Q. And the comments on the PCC? 5 A. I think her comments on the PCC speak for themselves, 6 really. That's why we intercut them in the way we did 7 within the film. I think we've just got honesty, 8 really, about how journalists view the Press Complaints 9 Commission. Actually, right down at the bottom here, 10 this idea that: 11 "They will tend to take more risks if they think 12 a PCC will be involved." 13 So obviously they have these two types of potential 14 restrictions, and one of them is a libel case or privacy 15 in the courts, and another one is the PCC. If they 16 think it's just the PCC, they'll push it further. So 17 yes, I think her comments on the PCC speak for 18 themselves. 19 Q. Have you seen Ms Jellema's statement to the Inquiry? 20 A. Very briefly. You gave it to me just before I came in, 21 so I haven't actually -- 22 Q. She says any views expressed about the PCC were solely 23 her own views and not those of the newspaper for which 24 she was working at the time and may not be 25 representative of every journalist's views. What do you Page 42</p>	<p>1 recollection of what happened? 2 A. As is in my witness statement, she called more than once 3 and she was very keen to run the story. I actually felt 4 a bit sorry for her because obviously I'd just basically 5 ceased contact and she was obviously under pressure 6 to -- it seemed, to be under pressure to make all this 7 happen. And, yes, as I say, we made a specific note at 8 the time, and it was discussed with my producers, that 9 one of the messages said: 10 "Can you get us a copy of the appointments book or 11 similar?" 12 And I think, therefore, that takes this beyond the 13 excuse that some people have maybe presented to this 14 investigation, which is: you never knew that they were 15 going to run the stories so they could have just been 16 mouthing off. I think this indicates they were very 17 keen. Again, it's not Sarah acting as a rogue agent. 18 It's with the authorisation of her news desk and legal 19 team. 20 Q. Have you kept a copy of any of these voicemail messages? 21 A. No, because it was a voicemail phone. It was a 'pay as 22 you go', so we didn't. 23 Q. Can we turn very briefly to the Sunday Mirror and the 24 meeting with Nick Owens. Again, this is summarised in 25 your witness statement, paragraph 45 onwards, and the Page 44</p>

<p>1 reason why I ask you about this is you say later on that 2 you believe Nick Owens' behaviour to be in the most 3 blatantly in breach of the rules. So as we're going 4 through, perhaps you could tell us why you take that 5 view. 6 A. Certainly. I think this -- they all sort of cross the 7 line to different degrees, and I'd be -- I think it's 8 important to make that point, and I think with Owens, as 9 he says right at the start, he has the eye and the ear 10 of the news editor and the editor as well. I think he 11 seemed to be a much more senior journalist in the 12 organisation than maybe Sarah was in hers. 13 Paragraph 47, I found this very interesting. When 14 we were talking about the confidentiality issue and the 15 source potentially losing her job for giving me 16 information, Nick Owens said: 17 "I understand that. I cover a lot of health 18 stories, and I work with a lot of health 19 professionals ... I work with people in that area as 20 well." 21 Now, we come to paragraph 48, and this is where -- 22 we'll come to the public interest in a minute, but this, 23 I think, sets that up in terms of how tabloid 24 journalists view the subject of public interest, because 25 they're talking about potentially reporting a story</p> <p style="text-align: center;">Page 45</p>	<p>1 one." 2 So he's essentially asking us to go away and start 3 collating information right now and get as much as 4 possible. 5 Coming on to paragraph 56, we're talking about Rhys 6 Ifans, who -- we had, again, fabricated a story that he 7 had had a tummy tuck: 8 "I think Rhys Ifans is funny because -- you know, 9 Rhys Ifans wanting a tummy tick is a very funny story 10 but then again, is it justified in the public interest? 11 That's the problem. We could get away with Gemma [ie 12 Gemma Arterton]. That's massive, good story." 13 But then he revisits Rhys Ifans, after thinking 14 about it: 15 "Having a tummy tuck to get rid of Rhys Ifans' beer 16 belly, isn't it -- it's a fucking good story. Of all of 17 them, you could do Rhys. You could probably do Rhys 18 Sunday. Rhys you could probably get away with because 19 it's so funny." 20 Then just the last bit of paragraph 59: 21 "The thing to say to your friend is what can you 22 get, because the more the better, really." 23 This is in the context of medical documentation. 24 "If she can, get a document on everything." 25 That's why I think his behaviour was the worst.</p> <p style="text-align: center;">Page 47</p>
<p>1 that's in the public interest and saying: 2 "There isn't a public interest in reporting that 3 somebody has had a gastric band operation unless they 4 are a massively big name, then you might make 5 a decision." 6 You know, he comes on to say: 7 "It's always up to the editor. Put it in front of 8 the editor and she will make the decision." 9 He steers the conversation onto documentation, 10 paragraph 50: 11 "Is there a document somewhere, piece of paper? Is 12 there an email that would prove that she had it?" 13 Then paragraph -- I didn't notice -- sorry, actually 14 paragraph 51, there is quite a curious phrase. I'd like 15 to note what he has to say about this. He says: 16 "It's not like the NHS, obviously, where you phone 17 up and they tell you about an operation that has 18 happened on such a such a date." 19 I don't know whether this is something they would do 20 at the NHS, but I noted that earlier. 21 So we're discussing about the process, about how he 22 might have to go to his news desk and they might then 23 come back and ask for documentation and he suggests 24 a way around this, so: 25 "Have you got anything available now? Do it in</p> <p style="text-align: center;">Page 46</p>	<p>1 Q. You then go on to say that he went on to write an 2 article about Chris Jefferies which was defamatory. You 3 don't enclose that article. What I've done is I have 4 printed out one of the exhibits to Mr Jefferies' witness 5 statement. It doesn't need to -- in fact, it probably 6 shouldn't be shown on the screen, but for the other core 7 participants in the room, it's document 31991, and I've 8 caused it to be handed out this afternoon. Is that the 9 article you were referring to? 10 A. Yeah. I mean, I think -- I don't know what we expected, 11 actually, when we went to this film, when the news of 12 this investigation was made public, but there was no 13 comment from the Mirror Group about the behaviour of the 14 journalists at The People or the Sunday Mirror, and the 15 PCC did nothing apart from occasionally write things 16 about the film, and the journalist, Nick Owens, stayed 17 in his job and he's there, he still works for them, as 18 I speak. And I just thought because I was making a film 19 about Chris Jefferies and I was researching articles on 20 that and it struck me that Nick Owens wrote an article 21 about Chris Jefferies, about him being obsessed by 22 poetry and how this basically indicated that he might be 23 a murderer, and it just struck me that maybe if the 24 Sunday Mirror had done their job and disciplined him or 25 if the PCC had investigated and he had lost his job,</p> <p style="text-align: center;">Page 48</p>

<p>1 basically, for trying to buy medical records, then maybe 2 this article wouldn't have been written, and this 3 article was subsequently found to be very libellous and 4 defamatory and the Sunday Mirror had to pay damages. So 5 I think it was just a general point that if they'd 6 disciplined him and moved him on, then maybe this 7 article wouldn't have been written. But as I say, 8 no one really did anything as a result of the film. 9 Q. Can I touch on the meeting that you had with 10 News of the World? 11 A. Yes. 12 Q. I think we can agree that Ms Numar(?) was much more 13 cautious than the others? 14 A. Definitely. 15 Q. Can we park her on that basis. 16 A. Please do. Sorry, to return to the point I made about 17 still breaking the rules because she was trying to set 18 News of the World up as a data controller. So she was 19 still asking me to impart verbal information to her that 20 had no public interest so they could store it, and this 21 is obviously in breach of the Data Protection Act. But 22 I completely agree; she was much more cautious than the 23 other two. 24 Q. Can we agree, though, a number of things about this 25 medical records sting. All of the newspapers you spoke</p> <p style="text-align: center;">Page 49</p>	<p>1 ethically we could and should have done to prove that 2 had the stories been true and had we had documentation, 3 they would have printed them, and I think that's fair to 4 say in the case of The People and the Sunday Mirror. 5 But no, of course they didn't actually do that and that 6 would have been grossly irresponsible for us to have 7 even risked that. 8 Q. I'm going to come on to the public interest in just 9 a moment, but let me touch on one thing. A number of 10 journalists seem to think it might be okay to publish 11 the story if the story was funny. 12 A. Mm. 13 Q. Does that make it better, in your view? 14 A. No. Whether a story is funny or not is -- I don't think 15 should have any bearing -- I'm not a lawyer, but I don't 16 think it has any bearing in law of whether it's 17 a defence -- 18 LORD JUSTICE LEVESON: I don't think it's defence. That 19 wasn't Ms Patry Hoskins' -- 20 A. Sorry. 21 LORD JUSTICE LEVESON: I don't think it's a question of 22 a defence. It's a question of whether you think it 23 makes it different. 24 A. No, certainly not in terms of something about someone's 25 private life.</p> <p style="text-align: center;">Page 51</p>
<p>1 to did recognise that there were difficult 2 confidentiality issues involved? 3 A. Yeah. The confidentiality -- actually, I had a look for 4 that word. Nick Owens talked about confidentiality 5 issues, but mainly as something to be overcome, to be 6 sidestepped and basically something that needed to be 7 overcome, and he didn't think there would be a problem 8 overcoming them, and actually confidentiality issues 9 were mainly talked about -- in fact, I think wholly 10 talked about in the context of protecting source, which 11 to be completely fair to them, they did all say that we 12 would go to extreme lengths to protect the source. 13 However, I also find that quite self-serving, because 14 they'd also want to protect the fact that it came from 15 a breach of the DPA, which is why they were talking 16 about hinting that the story had come from somewhere 17 else. 18 Q. Can we also agree that none of the newspapers committed 19 to publishing any of the information based on medical 20 records? 21 A. No, we didn't want to go anywhere sort of near there. 22 We couldn't jeopardise them actually printing something, 23 because this isn't about Sarah Harding being secretly 24 into quantum physics. This is obviously a story about 25 plastic surgery. So we went, I think, as far as</p> <p style="text-align: center;">Page 50</p>	<p>1 MS PATRY HOSKINS: So public interest. In the sting, the 2 journalists you spoke to did state that records could be 3 used to publish a story if it was in the public 4 interest. A number of them do actually say that in 5 terms. But in your view, would any of the stories that 6 you were describing -- so Gemma Arterton's gastric band, 7 one of Girls Aloud having a boob job -- would any of 8 those be in the public interest? 9 A. No. No. We sort of crafted them as -- I say 10 "crafted" -- we created them as such, so we wanted to 11 pick things that definitely could not qualify in the 12 public interest. I find it hard to see how any story of 13 a similar nature could be classed as in the public 14 interest. 15 Q. A number of them refer to the Fern Britton example, if 16 I can call it that. They said she'd had gastric band 17 surgery, but then when she was asked, "How did you lose 18 the weight?", she seemed to suggest that she'd been 19 eating healthily and exercising and the argument was 20 then: "Well, we're entitled to publish this story 21 because she has lied to the public about how she lost 22 the weight." 23 Do you consider the publication of the fact of her 24 surgery was in the public interest? 25 A. I don't know what the source of the Fern Britton story</p> <p style="text-align: center;">Page 52</p>

<p>1 was. In fact, no one knows --</p> <p>2 Q. Regardless of source.</p> <p>3 A. But I think the source is actually important because if,</p> <p>4 for example, it was her friend or her PA who tipped off</p> <p>5 the News of the World, and they ran it based on that,</p> <p>6 that wouldn't involve a breach of the Data Protection</p> <p>7 Act. That's just someone giving some evidence about</p> <p>8 something that happens to be true. I think maybe in</p> <p>9 that circumstance, you could say that has more merit</p> <p>10 than other stories about being in the public interest,</p> <p>11 so it has a weight to it. I'm not -- you know, it never</p> <p>12 went to court, it never went to the PCC, so we'll never</p> <p>13 know. But in that instance, you could say yes, it had</p> <p>14 more weight. But crucially that doesn't imply that that</p> <p>15 covers a breach of the DPA.</p> <p>16 What you're talking about here is a doctor or</p> <p>17 a nurse selling to a newspaper what happens within the</p> <p>18 confines of a medical room, and that should be sacred.</p> <p>19 As I say, I fail to see what public interest there can</p> <p>20 be for anything -- even if they have made some comments</p> <p>21 about eating Ryvita, I can't see how encouraging</p> <p>22 a medical professional to break that could be seen in</p> <p>23 the public interest in this context.</p> <p>24 Q. I'm going to ask you some brief final questions. I have</p> <p>25 two more topics to cover with you. First of all is the</p> <p style="text-align: center;">Page 53</p>	<p>1 the cinema because it's really important." And the</p> <p>2 Guardian obviously gave us a big push and then Channel 4</p> <p>3 came in and eventually bought the TV rights. So it</p> <p>4 wasn't like everyone ran for cover but the majority of</p> <p>5 the people within the media and the film business just</p> <p>6 didn't want to have anything to do with us at all,</p> <p>7 because -- I think they emotionally didn't like the idea</p> <p>8 that we were sort of criticising our own industry, and</p> <p>9 also there were these sort of legal threats that sort of</p> <p>10 exploded in a very sort of short period of time.</p> <p>11 Q. I'll come back to the legal threats, but let me just</p> <p>12 take you to paragraph 100. You say that on 15 October</p> <p>13 2009, the Guardian ran an article on their front</p> <p>14 page that you'd been selling fake celebrity stories to</p> <p>15 the tabloids and then the following day they ran the</p> <p>16 results of your medical records investigation. You say</p> <p>17 that the BBC covered this extensively. Did any other</p> <p>18 newspaper mention the fake stories or the medical</p> <p>19 records sting?</p> <p>20 A. No, no. There was absolutely no pick-up by the British</p> <p>21 press whatsoever.</p> <p>22 Q. Come on then to tell us, please, about the legal</p> <p>23 problems. At 104 onwards you tell us that you had a bit</p> <p>24 of a battle with the News of the World. Tell us about</p> <p>25 that as briefly as you can.</p> <p style="text-align: center;">Page 55</p>
<p>1 release of the film. You tell us at paragraph 96</p> <p>2 onwards about the release of Starsuckers and the</p> <p>3 problems you had?</p> <p>4 A. Yes.</p> <p>5 Q. Do you want to summarise for us very briefly, please,</p> <p>6 the problems that you had distributing the film and</p> <p>7 having it seen, et cetera?</p> <p>8 A. Well, no one wanted to help us, I think, but that's</p> <p>9 probably because the very people we need to help -- you</p> <p>10 need to help you when you release a film were all</p> <p>11 criticised within the film. So people weren't -- all</p> <p>12 media organisations weren't going to help a movie that</p> <p>13 specifically criticised them, and I did like to be fair</p> <p>14 by criticising everyone, so we didn't have very many</p> <p>15 friends.</p> <p>16 The Film Council was supposed to be giving us</p> <p>17 a grant -- it's only £5,000, but to help with the</p> <p>18 releasing costs and just before the film was released,</p> <p>19 because we were experiencing legal difficulties, they</p> <p>20 actually pulled out of that, just to give an example of</p> <p>21 how everyone did run for cover. But on the other hand,</p> <p>22 some people stepped up and really tried to help us. So</p> <p>23 the London Film Festival put it out in their festival.</p> <p>24 Independent cinemas said, "Look, we don't even care if</p> <p>25 the film is going to be sued. We're going to put it in</p> <p style="text-align: center;">Page 54</p>	<p>1 A. The News of the World obviously got quite upset that</p> <p>2 we'd invaded their privacy and they contacted our</p> <p>3 lawyers. The in-house legal team of the</p> <p>4 News of the World contacted our lawyers.</p> <p>5 Q. Mr Crone?</p> <p>6 A. It wasn't Mr Crone, actually. It was -- I can find out</p> <p>7 who it was. It was someone who worked just beneath him.</p> <p>8 It was their in-house legal team, certainly someone</p> <p>9 working under Mr Crone, basically saying that they felt</p> <p>10 that their journalists had been libelled and they wanted</p> <p>11 to basically prevent us releasing that section of the</p> <p>12 film, even though Tom Crone has said publicly before he</p> <p>13 wouldn't use libel laws against other journalists.</p> <p>14 Q. What was the upshot of this? Did they take you to</p> <p>15 court?</p> <p>16 A. No, sorry. The upshot was -- there was three legal</p> <p>17 teams in one week who all tried unsuccessfully to order</p> <p>18 us to edit the journalists and the News of the World out</p> <p>19 of the film, and we basically said, "We'll see you in</p> <p>20 court", and they went away.</p> <p>21 Q. You then tell us that the film was released,</p> <p>22 paragraph 124, and a number of newspapers printed</p> <p>23 reviews. Did any of the tabloids print reviews of the</p> <p>24 film?</p> <p>25 A. The Express gave us four STARS, which I thought was very</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 nice of them. A nice bit of -- I actually got a nice 2 letter from them as well, thanking us for the first 3 decent bit of publicity they'd had in a long time. But 4 no. I missed The Sun off here. The Sun didn't print 5 a review. So all -- I know all these critics came to 6 see the film because you have a press release that says 7 who came to see it. So they all came to see the film, 8 but none of them wrote reviews. So none of the papers 9 that were criticised printed reviews, no. 10 Q. You say at paragraph 127 that the reaction of the PCC 11 was mixed. What does that mean? 12 A. It's film parlance. When you say reviews are mixed, it 13 generally means "not good". Yes. Alison Hastings spoke 14 to some journalism students at City University and was 15 apparently very disparaging about the film. Stephen 16 Abell from the PCC wrote a letter to the -- Dublin 17 Times, was it? Belfast Telegraph, basically disagreeing 18 with what I was saying and disagreeing with the general 19 thrust of our arguments. 20 Q. Did you ever ask the PCC to investigate any of the fake 21 stories or the medical records sting? 22 A. Did I personally ask them to investigate? No, we kind 23 of thought it was something they might have the 24 initiative to do themselves. 25 Q. Did they investigate it? Page 57</p>	<p>1 my opinion; this is widely held opinion. 2 The penalties exacted on broadcasters are such that 3 I think some broadcasters -- and I think sadly in 4 particular the BBC -- almost in fear of an Ofcom 5 complaint will sort of water down their journalism and 6 stories. And we're not talking about celebrity 7 tittle-tattle; we're talking about really important 8 things in the public interest that they will water down, 9 and in some cases not even run cases in fear of what 10 happens when there's an Ofcom complaint. Rather than 11 accepting that every year, someone's going to get 12 something wrong and that's just part of life if you're 13 making this huge output, it's generally felt that Ofcom 14 penalties are so harsh that they have to be avoided at 15 all costs, which means you cannot possibly risk having 16 an Ofcom complaint. And I think that is having 17 a chilling effect on television journalism. 18 What is happening now is that technology is 19 completely overtaking this regulatory framework. So you 20 have Ofcom, which looks after television, and you have 21 the PCC which does or doesn't look after newspapers, but 22 newspapers are doing internet TV journalism. There was 23 a story that broke this morning about Bell Pottinger 24 being secretly filmed, which is on the Independent, and 25 they have clips on their news site of some of the Page 59</p>
<p>1 A. No, not to the best of my knowledge or the knowledge of 2 anyone I've spoken to. We just generally assumed that 3 they would start looking, but they didn't. 4 Q. You then go on at paragraph 132 to tell us that the True 5 Stories strand on More4 acquired the British TV rights 6 for the film and the film had to go through an Ofcom 7 compliance check? 8 A. Yes. 9 Q. Which took several months. You say the film was passed 10 uncut, bar a handful of minor alterations, and they were 11 not relevant to the parts -- 12 A. Elsewhere in the film, yes. 13 Q. Absolutely. Can I ask you this: you said right at the 14 outset that you'd always intended for the film to be 15 shown on television so you'd always had the Ofcom 16 regulations in mind. But you go on to say at 17 paragraph 146 of the statement that although the PCC 18 system is, in your view, is ineffective, the Inquiry 19 shouldn't use Ofcom as a regulator either. Can you tell 20 us perhaps a little about which specific aspects of 21 Ofcom you believe should be avoided? 22 A. Ofcom's a very sort of tough regulator for television, 23 and I think in some circumstances that's probably quite 24 necessary, but I think when it comes to journalism and 25 current affairs, it's far too onerous. This isn't just Page 58</p>	<p>1 undercover meetings. I've done short films for the 2 Guardian which sit outside of Ofcom, but if people are 3 sitting at home and they have the internet wired up on 4 their television, then they can watch the two side by 5 side. So it means that newspapers are able to do 6 TV-esque current affairs programme completely bypassing 7 Ofcom and what you're having is stories that aren't 8 being shown on TV going to newspapers because there's 9 a sort of a less harsh framework. 10 Then you also have the Internet, which is completely 11 unregulated. 12 LORD JUSTICE LEVESON: So you have the three regimes: Ofcom, 13 the PCC and nothing. 14 A. Exactly, and for the viewer at home, they're not aware 15 of this. They're just watching stuff and they're 16 completely unaware of what is regulated by who. And 17 what you, in my view, need to do is just level it and 18 have parity, either of two regulators or just have one 19 regulator. But as more and more newspapers are doing 20 video, this problem isn't going to go away, and you see 21 lots of documentary makers in some cases abandoning 22 television and going and taking their stories to the 23 Internet and to newspapers because they can tell 24 a better story. And I think, you know, the example of 25 today's story in the Independent totally stacks that up. Page 60</p>

<p>1 It's a fantastic story and it's video and it's online. 2 MS PATRY HOSKINS: Is there anything else that you'd like to 3 say about perhaps reform of the PCC or anything that 4 you'd like to add to what you've just said? 5 A. I think it's perfectly simple to me and lots of people 6 how the PCC needs to be reformed. 7 LORD JUSTICE LEVESON: Oh? 8 A. To my mind, the newspapers understand one thing, which 9 is money, and I think the undercover meetings that we've 10 shown show that the PCC adjudications are as good as 11 meaningless, really, in terms of correcting behaviour. 12 So if you had a body that could exact penalties and 13 fines, then it would be viewed in the same way that 14 libel fines are, and it's interesting if you look at 15 some of the things that we tried to put out, like 16 Alan Sugar. They said -- we found out they couldn't 17 print anything nasty about Alan Sugar because he's 18 litigious, so therefore the newspapers thought: "Well, 19 we won't touch him." But what would happen if everyone 20 was litigious, or what would happen if this new body 21 could fine newspapers in the way that a litigious 22 celebrity can hire Schillings or whoever to sue? Then 23 the newspapers would self-correct. They would say, "I'm 24 not going to run this story about this person because if 25 it turns out not to be true, I might get fined by the Page 61</p>	<p>1 my view, it isn't difficult. If you look at when public 2 interest justifies invasions of privacy or breach of the 3 Data Protection Act -- if you look at the MP's expenses, 4 that was a human breach of the Data Protection Act but 5 there was no question of the authorities prosecuting 6 because it was so overwhelmingly in the public interest. 7 If you look at some of the undercover filming done 8 by Dispatches on lobbying a year ago or the one today, 9 no one is questioning whether or not this is in the 10 public interest. I think that as a term the public 11 interest has been sadly taken away from where it should 12 be, which is that sphere, and then it's used by tabloid 13 newspapers sort of after the fact as a kind of stick-on 14 to try to justify something that's just invading 15 someone's private life, and I think as a term, it's been 16 just taken out of its correct context, and as even you 17 saw with Max Mosley, they invented details to turn it 18 into the public interest and I think -- I think we 19 almost need a new term for it, like the prurient 20 interest or something. That's the tabloids' legal 21 trick, and this is the public interest over here that 22 justifies proper investigative journalism going on. 23 MS PATRY HOSKINS: Thank you very much. Unless you have 24 anything else to say, thank you very much for answering 25 my questions. Page 63</p>
<p>1 PCC, and if I get fined by the PCC, I might lose my 2 job." 3 I think the other thing crucially is the lack of 4 credibility that the PCC has because of the number of 5 editors on the PCC itself, and I think that ruins its 6 credibility if people are complaining to the very people 7 who have wronged them. There's an argument I remember 8 approximate being put forward that basically says that 9 members of the public can't possibly understand how 10 newspapers work. I think that's nonsense. I think it's 11 very easy to understand how newspapers work. I think 12 that's as self-serving argument that's put forward to 13 keep newspaper editors in control of the PCC. So I 14 think you need to sever that link, be independent of the 15 press and definitely independent of government and be 16 able to exact fines. 17 The code is good. I wouldn't alter the code. It's 18 just who sort of -- who's responsible for enforcing it 19 that needs to change. 20 MS PATRY HOSKINS: Mr Atkins, is there anything you'd like 21 to add? 22 A. Just one thing on the public interest, sorry. 23 Q. Of course. 24 A. I think the public interest -- it's just the question 25 you asked about how you define the public interest. In Page 62</p>	<p>1 LORD JUSTICE LEVESON: Thank you very much. Thank you for 2 the work that you've obviously put into the submission 3 you've put in. 4 MR CAPLAN: Can I just say that on behalf of a third party, 5 Caters News Wire -- the news agency, in fact, which put 6 out this story regarding the chastity garter that ended 7 up eventually, having being refused by the Daily Mail 8 and the Mail Online -- I think it's just fair to say in 9 relation to that third party that we do understand that 10 they spoke to Mr Atkins -- or Mr Atkins spoke to them, 11 pretending, of course, to be a PR company. Caters News 12 Wire then spoke to the couple concerned, who Mr Atkins 13 had put them in touch with. They did make checks with 14 the couple before publishing it and they did look at the 15 website, of course, which has been fabricated, and 16 without that deception of the couple and the website, 17 the news wire would not have published the story. 18 I think it's fair to say that. 19 MS PATRY HOSKINS: Sir, I think I put that question to 20 Mr Atkins and he said that conversation never took 21 place. 22 A. It never took place. 23 LORD JUSTICE LEVESON: Yes, Mr Patry Hoskins did ask about 24 it. Thank you. 25 MS PATRY HOSKINS: Sir, that concludes the evidence for this Page 64</p>

<p>1 afternoon and I understand that we -- I'm losing track 2 of days. 3 LORD JUSTICE LEVESON: No, no, we have something else to do. 4 Yes, Mr Brown? 5 MR BROWN: I indicated to Ms Patry Hoskins that I would be 6 asking you to order that Mr Atkins provides the entirety 7 of the tapes and the covered film footage. 8 LORD JUSTICE LEVESON: But why? 9 MR BROWN: Because it's necessary to see the whole of the 10 conversations in context. 11 LORD JUSTICE LEVESON: Why? 12 MR BROWN: In order to see in what circumstances a story 13 might have been published and, if published, could have 14 been justified. 15 LORD JUSTICE LEVESON: Well -- 16 MR BROWN: Can I develop the submission? 17 LORD JUSTICE LEVESON: Please, develop it. 18 MR BROWN: First of all, let me indicate the material that 19 we are interested in. 20 LORD JUSTICE LEVESON: Have proceedings been commenced for 21 libel? 22 MR BROWN: With respect, I'm not sure that that has anything 23 to do with it. 24 LORD JUSTICE LEVESON: But that's the way that you would get 25 discovery of the entirety of the material, isn't it?</p> <p style="text-align: center;">Page 65</p>	<p>1 And finally, there is the issue of any notes of 2 voicemails that were left by any journalist, and in 3 particular by Ms Jellema for Mr Atkins, because it was 4 clear from Ms Patry Hoskins' questioning and the answers 5 to those questions that there is a dispute, an important 6 dispute, as to whether, as Ms Jellema says, the news 7 desk told her that they were going to drop it and she 8 left a note on the voicemail of Mr Atkins, or whether, 9 as he said, the messages on his voicemails were 10 enthusiastic and wanting to pursue this story. So 11 there's an important dispute there -- 12 LORD JUSTICE LEVESON: But I don't intend to resolve it, 13 Mr Brown. 14 MR BROWN: Well, I understand that the Inquiry's position is 15 that there will be no specific findings in this section 16 of the Inquiry, but on the other hand, an afternoon has 17 been devoted to considering all of Mr Atkins' many 18 complaints against the press in relation to my clients, 19 what he says are blatant illegalities, and the issue -- 20 it's not so much whether or not the Inquiry is going to 21 make a finding, but what in those circumstances is fair, 22 and that's what I don't need to remind you -- 23 LORD JUSTICE LEVESON: I am very conscious of wanting to be 24 fair, Mr Brown, and if your clients and the journalists 25 want to submit evidence, then of course, to be fair, it</p> <p style="text-align: center;">Page 67</p>
<p>1 MR BROWN: We suggest, with respect, that it's fairness to 2 the paper and to its journalists, who have been 3 criticised in trenchant terms by Mr Atkins for breaching 4 not merely the PCC code but also the Data Protection 5 Act, that one looks to see from the material in the 6 tapes and the entirety of the material whether there was 7 a basis for the newspaper investigating the matter in 8 order to see whether the material could be justified, 9 either because it was in the public domain -- it had 10 been put there in part by the celebrity; a point that 11 Mr Carling raises -- or in the public interest in the 12 sense that it was necessary in order to correct a public 13 figure who was misleading the public, and the example 14 obviously has been given of Britton, and one sees how 15 that reasoning can be traced back to the House of Lords' 16 decision in the Naomi Campbell case. 17 What we know is first of all that there are audio 18 tapes of the conversations on 20 March. They are said 19 to have been transcribed in toto, but we've not had the 20 opportunity to check the accuracy of the transcripts. 21 More significantly, there is the video footage of 22 the meetings on 26 March between Mr Atkins and first 23 Mr Owens and then Ms Jellema. We learnt this afternoon 24 that, so far as that is concerned, only half -- only 25 half of the material had been transcribed.</p> <p style="text-align: center;">Page 66</p>	<p>1 shall be deployed, but I'm not getting into a discovery 2 exercise. 3 MR BROWN: Can I just see what I have to say about 4 discovery? The problem is that these conversations took 5 place now over two and a half years ago, back in March 6 of 2009, so the difficulty that we have -- and 7 Ms Jellema is no longer in our employ, Mr Owens is, but 8 the difficulty is the best effort as to what they said 9 would be the full tapes. It's not surprising that they 10 can't recall precisely what was said, and it would be of 11 benefit, you may think, to this Inquiry, to know from 12 the available material all they said in order to gauge 13 what precisely was the position in relation to possible 14 defences, and both Section 55 and Section 32 of the DBA, 15 in slightly different wording, provide for public 16 interest defences, and there is no, as Mr Atkins is 17 suggesting -- and there is no absolute sanctity 18 attaching to medical treatment or hospital treatment. 19 One sees that from the Naomi Campbell case itself, where 20 she was seeking clinical treatment to cure her 21 addiction. 22 If I can just list why I say that fairness 23 necessitates the full examination of any record that he 24 may have of anything said and left on his voicemail, but 25 also, and just as importantly, the entirety of the</p> <p style="text-align: center;">Page 68</p>

<p>1 covered film footage, firstly it's the context, as I've 2 said, which may well indicate that the approach that was 3 being adopted was consistent with the PCC code rather 4 than flouting it --</p> <p>5 LORD JUSTICE LEVESON: I find it quite difficult to see how 6 that might be, out of what we've seen.</p> <p>7 MR BROWN: That is the point. What have we seen?</p> <p>8 LORD JUSTICE LEVESON: We've seen a distinct chunk. 9 Mr Brown, if I go down this route, if I go down this 10 route, then in relation to each fact -- and we over the 11 last few weeks have heard many, many facts, many 12 allegations, great issues raised by a number of the 13 journals, media representatives who are here -- if I was 14 to do that, then it would be quite impossible for me not 15 to do it in every single case, and I would be here for 16 a decade.</p> <p>17 MR BROWN: Well, I'm not suggesting that it would be 18 necessary, still less desirable, an exercise of 19 discretion in every single case, but what I am 20 suggesting is that it wouldn't be right and would offend 21 basic fairness if you were to take the position that it 22 would never be done.</p> <p>23 And here, where allegations of illegality have been 24 made against my clients and where, if the full covered 25 film footage is examined, there could well be a basis,</p> <p style="text-align: center;">Page 69</p>	<p>1 Ms Patry Hoskins were to say there is nothing relevant 2 there to the issue of a possible defence. But as 3 I understand it, the arbiter of relevance is Mr Atkins 4 himself and it might be said that in that respect, given 5 the strength of his feelings towards the tabloid press, 6 he's somewhat parti pris.</p> <p>7 The other point that I would make is this: he 8 appears to believe that there is some form of 9 journalistic privilege in law which attaches to unedited 10 material. He says as much in paragraph 108 of his 11 witness statement. He's repeated it again today. If 12 material is being held back on that basis, there is, in 13 my submission, no footing in law on which that can 14 properly be done.</p> <p>15 LORD JUSTICE LEVESON: I understand, but that's not the 16 reason that I would say no.</p> <p>17 What you raise is the interesting question. First 18 of all, I am absolutely opposed to a satellite 19 investigation. I will consider, and I am prepared to 20 consider, whether to ask Mr Atkins to allow a member of 21 the Inquiry team to see or to read whatever else is 22 there. I'd have to discuss that and think about it, but 23 I am prepared to think about that, simply in the spirit 24 of seeking to deal with your concern. But I'm not going 25 to go down the route of disclosure between witnesses and</p> <p style="text-align: center;">Page 71</p>
<p>1 as I submit there is, for submitting that there was no 2 breach of the code, not likely to be a breach of the 3 code, and no illegality, my contention is that it ought 4 to be possible to look at this material and it will 5 speed the evidence that will ultimately be given by the 6 journalist and their editors.</p> <p>7 LORD JUSTICE LEVESON: I'm not so sure about that because 8 whereas I'm perfectly happy to receive the evidence, and 9 of course the right of response, if it's necessary, will 10 be considered, I am focused very much on a much, much 11 wider question.</p> <p>12 The fact is that, as I understand it, this film was 13 screened in --</p> <p>14 MR BROWN: October 2009.</p> <p>15 LORD JUSTICE LEVESON: -- October 2009, thank you, in other 16 words, within months of the events. I have absolutely 17 no doubt that your clients were on top of the 18 allegations. Doubtless they have responded, and I'd 19 look at a response, but the problem about remembering 20 now is not a new problem. This is something that 21 they've been actually on top of for some time.</p> <p>22 MR BROWN: Can I just direct your attention out of the 23 question of relevance? It would be very different if 24 one of the Inquiry team had looked at the other half of 25 the covered film footage and -- Mr Jay or</p> <p style="text-align: center;">Page 70</p>	<p>1 core participants. I'm just not going to do it.</p> <p>2 MR BROWN: Well, you've made that very clear. So far as any 3 safeguard is concerned, that is some consolation if one 4 of the counsel on the Inquiry team looks at it, and in 5 the light of what I've said about relevance to any 6 possible defences --</p> <p>7 LORD JUSTICE LEVESON: I understand. I understand. I will 8 give that immediate thought.</p> <p>9 MS PATRY HOSKINS: Sir, may I clarify one matter?</p> <p>10 LORD JUSTICE LEVESON: Yes.</p> <p>11 MS PATRY HOSKINS: I just want to make it absolutely clear, 12 on 1 November this we're we wrote to the Mirror Group 13 enclosing a draft version of Mr Atkins' witness 14 statement, making it clear that they were being given 15 a full opportunity to respond to the allegations that 16 were made. We made it clear when serving the notices 17 concerned that you would not be deciding any specific 18 issues. It wasn't an issue of Mr Atkins is right or the 19 journalist is right. The notices contained the most 20 general questions along the lines of, well, "If what is 21 said by the journalist is accurate, what would be the 22 view of your newspaper group?" et cetera, et cetera. 23 There's simply no need, in my submission, for Mr Brown 24 or his client to see the underlying material in those 25 circumstances.</p> <p style="text-align: center;">Page 72</p>

18 (Pages 69 to 72)

<p>1 LORD JUSTICE LEVESON: I understand the point. 2 MS PATRY HOSKINS: But I'm happy to go to Mr Atkins' studio 3 and watch hours of footage, if that would assist. 4 I don't think it's necessary in order to comply with the 5 notices. 6 LORD JUSTICE LEVESON: I'll contemplate that. I don't 7 anticipate it would be hours, because it's a specific 8 video, but I would need to think about it and I would 9 need to take Mr Atkins' views, which I don't intend to 10 do in public at this moment. Thank you. 11 MR BROWN: Could I just add that we only got his witness 12 statement last week on 28 November. 13 LORD JUSTICE LEVESON: I'm sorry about that, Mr Brown. 14 You'll appreciate that -- well, I will investigate as to 15 when you got it. I'll look at that question. 16 MR BROWN: You'll see that's -- 17 LORD JUSTICE LEVESON: I think you've had access to the 18 Lextranet website. 19 MR BROWN: Yes, but I -- there wasn't. Herbert Smith tell 20 me it wasn't there until 28 November. 21 LORD JUSTICE LEVESON: That's interesting. 22 MR BROWN: We didn't have the full transcripts which are 23 annexed to the statement. The statement itself is dated 24 by Mr Atkins when he signed it, 28 November, so it 25 wouldn't have been possible to serve it on us before</p> <p style="text-align: center;">Page 73</p>	<p>1 represented are representing all the strata of the 2 organisations from which they emanate. I just wanted to 3 check that position. 4 Mr Brown, is that so for -- 5 MR BROWN: Yes. It's not any different for us. I mean, 6 obviously if there were to be a conflict between the 7 managers of the paper and a journalist, something 8 different might arise. 9 LORD JUSTICE LEVESON: What I said, I think, at one of the 10 earliest hearings was that this is not the normal 11 contentious litigation, and that I would hope that those 12 who were acting for titles could manage the differences 13 of view perfectly satisfactorily without feeling 14 themselves conflicted from so doing. I'm not going to 15 start saying, "Well, you can't say this because somebody 16 in your team says that". I'm keen to get everybody's 17 help to such extent as they can give it, and -- 18 MR BROWN: Yes, I understand that, and I've taken a rather 19 less restrictive view than one might have done in 20 ordinary litigation. 21 To take the example with Ms Jellema, she talks about 22 the PCC being a slap on the wrist; the editor would say 23 something very, very different. 24 LORD JUSTICE LEVESON: Yes, I understand. Thank you. 25 Can I ask the same about News International?</p> <p style="text-align: center;">Page 75</p>
<p>1 then. 2 LORD JUSTICE LEVESON: There was a draft version, 3 Ms Patry Hoskins said. 4 MR BROWN: She did say that. As far as I know, we never saw 5 it. 6 LORD JUSTICE LEVESON: I'll look just for the sake of 7 clarity. 8 MR BROWN: That's very kind. Thank you. 9 LORD JUSTICE LEVESON: Thank you very much. 10 Could I just raise a very different question for 11 reasons which don't need to be elucidated? I am quite 12 keen to understand whether I've correctly understood the 13 position of the core participants who do represent 14 newspapers today. Mr Caplan, can I start with you? 15 It's not a difficult question, I think, but I've always 16 understood that you came for Associated Newspapers 17 representing the editor and the editorial team, such 18 journalists as you felt required representation and also 19 the proprietor, whatever form that was. Is that right? 20 MR CAPLAN: Yes. I think the interests of those people and 21 of Associated Newspapers Limited. 22 LORD JUSTICE LEVESON: Yes. I'm going to ask others that, 23 because it's recently been suggested that proprietors 24 haven't had the opportunity to take part, and I'd rather 25 thought that each of the newspaper organisations who are</p> <p style="text-align: center;">Page 74</p>	<p>1 MS BOASE: This team acts for News International and its 2 subsidiaries and three titles. It's never been relevant 3 as to whether we act for the proprietors of 4 News International. If you'd like me to take 5 instructions on that, I can. 6 LORD JUSTICE LEVESON: I hope you are, and you might 7 obviously like to consider it. It's only because it was 8 suggested that I wasn't listening to proprietors that 9 I felt it right to ask the question. 10 MS BOASE: We'll take instructions. 11 LORD JUSTICE LEVESON: Anything else? 12 MS PATRY HOSKINS: I don't think so, unless anyone has 13 anything they would like to raise. 14 LORD JUSTICE LEVESON: Thank you very much. It's Thursday. 15 (4.23 pm) 16 (The hearing adjourned until 10 o'clock 17 on Thursday, 8 December 2011) 18 19 I N D E X 20 21 MR STEVEN JOHN NOTT (affirmed)1 22 Questions from MR BARR1 23 MS CHARLOTTE ROSE HARRIS (sworn)18 24 Questions from MR BARR18 25 MR DAVID LEIGH (affirmed)48 Questions from MR BARR48</p> <p style="text-align: center;">Page 76</p>

1	MR CHRISTOPHER WALSH ATKINS106
2	(affirmed)
3	Questions from MS PATRY HOSKINS106
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

A	advertorial 32:1 33:7	appealing 29:4	attaches 71:9	16:22 27:16	16:16 38:11	careful 16:23 25:19,20 37:18 38:5,9
abandoning 60:21	advertorials 31:23	appear 10:11 11:22	attaching 68:18	45:2 47:25	49:17	Carling 36:23 37:13 66:11
Abell 57:16	advice 10:20,21 10:22 34:13,24	appearance 2:10 2:12 3:5	attention 12:4 38:23 70:22	48:13 61:11	brick 9:25	carried 1:18 34:14
Aberystwyth 13:6	affair 25:1,2,4	appears 71:8	audio 1:10,18 15:10,18 16:1	Belfast 57:17	brief 53:24	case 3:14 5:9 7:13 10:6
able 12:16 18:6 24:22 26:22 60:5 62:16	affairs 58:25 60:6	apply 32:3	16:2 66:17	belief 4:10,25	briefly 6:4 16:5 29:7 36:1	cases 7:5,9 27:8 59:9,9 60:21
abruptly 27:21	affirmed 4:1 76:20,24 77:2	appointments 43:16 44:10	audit 10:14	believe 2:25 9:13 45:2 58:21 71:8	42:20 44:23 54:5 55:25	categorically 36:7
absolute 16:24 23:5 24:17 35:13 68:17	afternoon 1:4,5 48:8 65:1	appreciate 73:14	authorisation 44:18	believed 20:25	Britain 29:25	Caters 30:2,6 31:11 64:5,11
absolutely 5:16 8:24 29:19 30:15,21 33:6 35:18 38:5 55:20 58:13 70:16 71:18 72:11	approach 69:2	Apprentice 19:6	authorities 63:5	believes 43:6	British 6:5,9,18 7:8,23 11:24 13:5 24:22 27:23 55:20 58:5	caused 48:8 cautious 49:13 49:22
absorbing 9:4	approached 16:9	approximate 62:8	available 3:17 10:6 46:25 68:12	Bell 33:7 59:23	Britney 11:17 16:11 17:10	celebrity 12:15 18:20 22:16 23:1,21,22,25 27:5,15,20 28:1,5,15,22 32:19 55:14 59:6 61:22 66:10
absurd 22:6	approximate 62:8	approximately 5:11 8:6	awful 19:17	belly 47:16	Britton 52:15,25 66:14	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
abusing 27:23	areas 8:11 28:6 36:14	arbitrarily 71:3	awards 6:9,19	beneath 56:7	broke 39:18 59:23	celebrities 17:4,4 17:8 22:12 25:24 26:9 33:18,25 34:4 43:17
accept 1:24	argue 49:12,22 49:24 50:18	arbitrary 32:11	aware 30:17 60:14	benefit 68:11	broke 39:18 59:23	caused 48:8 cautious 49:13 49:22
accepted 1:21	agree 49:12,22 49:24 50:18	arbitrarily 32:11	awful 19:17	best 4:10,24 6:15 20:19 26:8 58:1 68:8	Brown 1:22,23 2:9,25 3:16,18 65:4,5,9,12,16 65:18,22 66:1 67:13,14,24 68:3 69:7,9,17 70:14,22 72:2 72:23 73:11,13 73:16,19,22 74:4,8 75:4,5 75:18	ceased 44:5 celebrities 17:4,4 17:8 22:12 25:24 26:9 33:18,25 34:4 43:17
accepting 59:11	agreed 1:16	arbitrarily 32:11	awful 19:17	beyond 44:12	broke 39:18 59:23	celebrity 12:15 18:20 22:16 23:1,21,22,25 27:5,15,20 28:1,5,15,22 32:19 55:14 59:6 61:22 66:10
access 73:17	Alan 19:3 35:8 35:15 61:16,17	arbitrary 32:11	awful 19:17	big 46:4 55:2	broke 39:18 59:23	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
accompany 16:10	Alcohol 6:8	arbitrary 32:11	awful 19:17	biggest 19:10	Brown 1:22,23 2:9,25 3:16,18 65:4,5,9,12,16 65:18,22 66:1 67:13,14,24 68:3 69:7,9,17 70:14,22 72:2 72:23 73:11,13 73:16,19,22 74:4,8 75:4,5 75:18	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
account 2:1	Alison 57:13	arbitrary 32:11	awful 19:17	bios 43:3	Birmingham 30:4	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
accuracy 17:16 22:18 66:20	allegations 69:12 69:23 70:18 72:15	arbitrary 32:11	awful 19:17	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
accurate 33:4 72:21	alleged 5:23 30:18	arbitrary 32:11	awful 19:17	Bizarre 19:13 23:8	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
accurately 17:24	allow 71:20	arbitrary 32:11	awful 19:17	black 21:3,4,15 21:20	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
accusing 12:2	allowed 16:9	arbitrary 32:11	awful 19:17	Blair 6:13	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
acquire 9:7	Aloud 19:11 40:17,24 52:7	arbitrary 32:11	awful 19:17	blanket 9:12 10:3	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
acquired 58:5	alter 62:17	arbitrary 32:11	awful 19:17	blatant 67:19	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
act 12:22 34:10 41:20 42:3 49:21 53:7 63:3,4 66:5 76:3	alterations 58:10	arbitrary 32:11	awful 19:17	blatantly 45:3	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
acting 26:8 44:17 75:12	amazing 32:7	arbitrary 32:11	awful 19:17	blaze 27:11	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
action 38:10	amount 11:7 12:9,16	arbitrary 32:11	awful 19:17	blonde 19:15	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
active 7:7	ample 7:22	arbitrary 32:11	awful 19:17	board 33:5	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
actively 7:11 11:21	Amy 27:9	arbitrary 32:11	awful 19:17	BOASE 76:1,10	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
actors 22:13	Amy's 27:10	arbitrary 32:11	awful 19:17	Bob 14:25	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
acts 76:1	Andy 27:25	arbitrary 32:11	awful 19:17	body 61:12,20	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
actuality 23:6	Angels 11:18	arbitrary 32:11	awful 19:17	Bono 18:10	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
add 2:9 19:21 27:14 29:2 39:11 61:4 62:21 73:11	angry 17:5,7	arbitrary 32:11	awful 19:17	boob 40:17 52:7	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
added 27:9	annex 1:11 37:1	arbitrary 32:11	awful 19:17	book 43:16 44:10	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
addiction 68:21	annexed 73:23	arbitrary 32:11	awful 19:17	boost 28:17	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
additional 5:9	annexes 4:19 5:21 14:23,24	arbitrary 32:11	awful 19:17	borne 2:11	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
adept 28:18	announced 11:13	arbitrary 32:11	awful 19:17	bottom 42:9	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
adjourned 76:16	annoyed 18:25	arbitrary 32:11	awful 19:17	bought 55:3	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
adjudications 61:10	anonymous 32:20	arbitrary 32:11	awful 19:17	breach 34:9,12 35:1 36:17 40:14 45:3 49:21 50:15 53:6,15 63:2,4 70:2,2	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
adopted 69:3	answering 63:24	arbitrary 32:11	awful 19:17	breaches 41:21	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
advertiser 13:12	answers 67:4	arbitrary 32:11	awful 19:17	breaching 41:19 66:3	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16
advertising 9:4 31:25	anticipate 73:7	arbitrary 32:11	awful 19:17	break 8:10 15:23 33:17 53:22	bit 10:23 11:1 12:3 17:9 21:14 22:2 26:21,23 31:25 41:10 44:4 47:20 55:23 57:1,3	celebrity's 18:1 cent 13:7 32:11 certain 7:9 12:15 12:16

element 20:24	exaggerate 22:18	face 2:7	20:15 24:2	four 8:10 25:10	global 28:11	67:16
elucidated 74:11	exaggerations	facie 7:22	26:1 27:19	56:25	go 8:4,18,25 9:9	handed 48:8
email 30:21	22:12	fact 2:1 14:12	29:9 33:2	fourth 38:14	10:1,13 21:23	handful 30:21
46:12	examination	19:24 20:6,18	35:25 42:7	fourthly 8:14	21:24 23:10	58:10
emails 30:16	68:23	23:4,14,22	48:11,16,18	fraction 11:7	25:25 34:16	handling 28:18
emanate 75:2	examined 69:25	26:10 36:15	49:8 54:1,6,10	framework	39:9 40:23	happen 18:8
emerging 2:19	example 7:9 9:13	48:5 50:9,14	54:11,16,18,23	59:19 60:9	43:7 44:22	44:7 61:19,20
emotionally 55:7	11:14 14:25	52:23 53:1	54:25 55:5	free 3:1	46:22 47:2	happened 30:11
employ 68:7	52:15 53:4	63:13 64:5	56:12,19,21,24	freedoms 7:4	48:1 50:12,21	44:1 46:18
enclose 48:3	54:20 60:24	69:10 70:12	57:6,7,12,15	friend 27:10	58:4,6,16	happening 59:18
enclosing 72:13	66:13 75:21	facts 12:6 21:21	58:6,6,9,12,14	47:21 53:4	60:20 69:9,9	happens 13:13
encouraging	examples 27:19	27:8,13,22	65:7 69:1,25	friends 54:15	71:25 73:2	53:8,17 59:10
53:21	35:10	29:4 30:14	70:12,25	front 4:8 40:21	goes 9:1 11:7,9,9	happily 7:16
ended 7:1 28:2	excerpts 16:6	69:11	filmed 59:24	40:23 41:7	32:12 42:3	11:23
64:6	exchange 3:1	factual 25:15	filming 9:12,19	46:7 55:13	going 1:5,11,13	happy 70:8 73:2
enforcing 62:18	excuse 44:13	factually 24:7	63:7	gucking 47:16	2:3 3:10 6:21	hard 14:21 52:12
engineered	exercise 68:2	29:1	films 6:7,10 60:1	full 2:7 4:4,5 5:2	9:21,22 12:25	Harding 19:11
12:10	69:18	fact-checking	final 53:24	5:6,12 31:24	15:7,9 16:5	50:23
enquire 1:25	exercising 2:1	24:4	finally 67:1	68:9,23 69:24	19:15 29:5	harmless 26:21
ensure 3:8 15:6	52:19	fail 53:19	find 2:11,22 4:7	72:15 73:22	33:10 34:25	HARRIS 76:22
entering 16:16	exhibit 38:15	failing 31:22	13:21 20:1,10	fun 19:1 31:7	37:25 38:14	harsh 59:14 60:9
enthusiastic	exhibits 4:19	fair 50:11 51:3	25:13 33:13	fundamental	44:15 45:3	harvest 38:7
67:10	48:4	54:13 64:8,18	50:13 52:12	12:5	51:8 53:24	harvesting 34:11
entirely 17:20,25	expected 48:10	67:21,24,25	56:6 69:5	funny 22:15 47:8	54:12,25,25	38:1
37:22	expenses 63:3	fairly 22:13	finding 67:21	47:9,19 51:11	59:11 60:8,20	Hastings 57:13
entirety 38:25	experience 10:9	fairness 38:21	findings 67:15	51:14	60:22 61:24	head 27:10
39:6 65:6,25	experiencing	39:2 66:1	fine 38:5 61:21	further 21:11	63:22 67:7,20	headline 39:18
66:6 68:25	54:19	68:22 69:21	fined 61:25 62:1	41:10 42:16	71:24 72:1	health 34:22
entitled 35:9	explain 8:19 10:1	fake 12:4 14:3	fines 61:13,14	43:24	74:22 75:14	36:15 45:17,18
52:20	10:23 16:8	17:15 55:14,18	62:16	G	good 1:4,23 2:16	healthily 52:19
Entitlement	33:24 35:19	57:20	finish 15:4	garter 29:9	31:7 32:4,11	hear 20:12 23:5
11:16	explained 29:9	false 17:20,21,25	finished 1:13 3:7	30:19 64:6	36:20 47:12,16	36:9
eroded 6:13	35:10 37:1,2	famous 40:21	first 6:2,15 16:5	gastric 46:3 52:6	57:13 61:10	heard 20:3 69:11
eroding 7:4	exploded 55:10	fan 19:11	20:3 26:16	52:16	62:17	hearing 1:11
error 6:19	exploding 11:18	fantastic 61:1	27:6 36:23,25	Gate 7:10	Google 2:3	76:16
especially 10:9	expose 7:20 10:8	fantastical 18:15	37:2,12 40:8	gather 14:17	Gordon 19:13	hearings 75:10
17:1 24:10	exposing 8:20	22:2 26:13	53:25 57:2	gauge 68:12	23:7 28:20	heart 41:13
essentially 4:20	Express 9:11	far 27:18 30:2	65:18 66:17,22	Geldof 14:25	gossip 22:22,24	held 59:1 71:12
12:2,13,21	35:22 36:3,5	38:11 50:25	71:17	Gemma 47:11,12	23:2,24 24:7,8	help 13:24 54:8,9
13:10 26:1	36:10 56:25	58:25 66:24	firstly 69:1	52:6	24:8,9,11	54:10,12,17,22
41:2,24 47:2	expressed 42:22	72:2 74:4	five 6:8 31:21	general 34:17	26:22,23 28:1	75:17
et 54:7 72:22,22	extensive 10:21	fear 7:8 59:4,9	Flat 7:21	49:5 57:18	generalment 6:13	helped 27:4
ethical 10:12	10:22 14:24	feature 6:7,12	floor 14:18	72:20	33:3 62:15	Herbert 73:19
28:12	extensively 8:24	fed 7:12 18:20	flouting 69:4	generally 3:12	grant 54:17	high 10:12 34:4
ethically 51:1	29:7 55:17	19:7 29:16	fluff 29:3	57:13 58:2	great 14:2,18	higher 10:15
Ethics 35:4	extent 9:19 75:17	feed 15:6 16:1	focused 70:10	59:13	16:13 24:22	hinting 39:23
evening 21:1	extra 29:3	29:25	folder 4:7	getting 17:7	30:15,23 37:7	41:5 50:16
event 30:24	extract 6:21 14:8	feeling 75:13	followed 16:20	25:14 31:9	69:12	hire 61:22
events 70:16	17:18 29:8	feelings 26:21	following 7:25	68:1	grossly 51:6	HJK 3:5
eventually 55:3	37:4 38:22	71:5	16:11 43:10	girls 12:13 19:11	group 48:13	hoax 31:8
64:7	extracts 35:23	felt 44:3 56:9	55:15	40:17,23 52:7	72:12,22	hoaxer 14:1
everybody 1:8	extraordinarily	59:13 74:18	follow-up 31:5	give 9:7 11:1	guaranteed	hoaxes 13:25
everybody's	25:19	76:9	footage 65:7	17:20 20:12	35:13	home 41:7 60:3
75:16	extreme 50:12	Fern 52:15,25	66:21 69:1,25	31:19 38:2	Guardian 2:4	60:14
ever-replenishi...	extremely 30:11	fertile 8:1	70:25 73:3	54:20 72:8	20:5 39:17	honest 32:14
12:12	34:22	festival 54:23,23	footballers 22:13	75:17	55:2,13 60:2	38:17
evidence 1:17	ex-boyfriend	fictitious 18:4	footing 71:13	given 3:6 10:9	guilty 26:1	honesty 42:7
3:6 4:22 7:22	34:3	19:21 33:23	Forest 7:10	16:24 19:16	guise 6:13	43:5
22:9,10 28:9	eye 21:3,4,15,20	figure 9:8 66:13	form 71:8 74:19	27:12 34:6	guy 11:14 20:14	hope 26:7 75:11
34:4 53:7	37:20 45:9	file 40:10 41:19	formal 9:9	66:14 70:5	20:23 21:9	76:6
64:25 67:25	F	film 1:13 6:5,9	forth 40:15	71:4 72:14	H	Hopefully 16:1
70:5,8	fabricate 27:13	6:15,19,21,25	forthress 9:25	giving 24:20 28:9	half 5:11 31:16	hoping 24:13
exact 9:8 61:12	fabricated 8:13	8:2,11,18,21	forward 62:8,12	45:15 53:7	37:11 66:24,25	Hoskins 1:4,19
62:16	10:24 19:14	11:2,6,8,10	found 7:5 11:12	54:16	68:5 70:24	4:2,3,18 15:4,9
exacted 59:2	27:8 47:6	14:11 15:7,9	13:7 30:1	glass 22:4	halfway 38:15	15:13,17,19,25
exactly 21:22	64:15	15:10,16 16:6	40:13 45:13	glimpse 43:4	hand 54:21	16:4 33:10
30:6 60:14		17:18 19:12	49:3 61:16			51:19 52:1

61:2 62:20 63:23 64:19,23 64:25 65:5 67:4 71:1 72:9 72:11 73:2 74:3 76:12 77:3 hospital 68:18 hours 30:12 31:12 73:3,7 House 66:15 huge 12:9 31:21 59:13 human 63:4 hurt 26:21 husband 30:18 31:4 hypocrisy 23:10	65:5 indicates 39:21 44:16 individuals 37:23 industry 6:5 55:8 ineffective 58:18 infiltrate 13:5 information 2:15 3:1,9 7:12 12:9 12:18 18:7 33:18,22 34:11 34:18,25 38:8 40:1,2 41:16 41:17,21 42:1 45:16 47:3 49:19 50:19 inherently 26:5 34:9 initial 12:6 initiate 35:20 initiative 57:24 Inquiry 2:19 3:2 4:6,14 5:13,20 8:5 11:10,12 14:11,20,23 23:15 28:2 37:1 39:12 42:19 43:20 58:18 67:16,20 68:11 70:24 71:21 72:4 Inquiry's 38:23 67:14 insert 13:21 inside 40:22 insinuation 25:17 instance 26:18 39:3 53:13 instructed 38:6 instructions 76:5 76:10 intend 67:12 73:9 intended 58:14 intercut 42:6 interest 2:17 10:18 11:13 33:19 34:18,19 34:21 41:22 45:22,24 46:1 46:2 47:10 49:20 51:8 52:1,4,8,12,14 52:24 53:10,19 53:23 59:8 62:22,24,25 63:2,6,10,11 63:18,20,21 66:11 68:16 interested 33:1,4 37:17 65:19 interesting 40:13 40:15 45:13 61:14 71:17 73:21	interests 13:10 13:11 26:8 31:8 74:20 intermediary 33:24 International 75:25 76:1,4 internet 2:3,13 20:8 59:22 60:3,10,23 interview 2:6 31:4 introduction 11:1 intrusive 34:6 invaded 56:2 invading 63:14 invasions 63:2 invented 21:14 63:17 invention 30:19 investigate 10:18 57:20,22,25 73:14 investigated 48:25 investigating 66:7 investigation 35:20 38:10 44:14 48:12 55:16 71:19 investigative 63:22 involve 34:9,12 53:6 involved 3:12 5:4 36:8 42:12 50:2 in-house 56:3,8 Iraqi 27:23 irresponsible 51:6 issue 2:9 36:15 39:14 45:14 67:1,19 71:2 72:18 issues 34:22 50:2 50:5,8 69:12 72:18	31:22 40:17 45:15 48:17,24 48:25 52:7 62:2 jobs 27:6 Jobson 6:7 JOHN 76:20 journalism 17:16 21:7 22:11 23:13 24:16 57:14 58:24 59:5,17 59:22 63:22 journalist 5:8 23:18 27:20 28:1,23 32:6 36:21 37:8 43:6 45:11 48:16 67:2 70:6 72:19,21 75:7 journalistic 5:14 5:15,19 28:4 71:9 journalists 4:21 5:3 8:22,22 9:6 9:20 12:6,22 23:10,17 24:11 24:18 27:2,3 28:11 31:19 33:16 34:17 35:25 41:15 42:8 43:2,5 45:24 48:14 51:10 52:2 56:10,13,18 66:2 67:24 74:18 journalist's 42:25 journals 69:13 judgment 3:14 3:21 juggle 21:13,25 juggling 20:15 21:12 JUSTICE 1:3,15 1:20 2:8,15 3:18 4:12,17 14:9,15 15:2,7 15:12,18,21 16:3 32:15,19 51:18,21 60:12 61:7 64:1,23 65:3,8,11,15 65:17,20,24 67:12,23 69:5 69:8 70:7,15 71:15 72:7,10 73:21 74:2,6,9 74:22 75:9,24 76:6,11,14	K keen 35:8,15 43:13 44:3,17 74:12 75:16 keep 41:19 62:13 kept 44:20 Kev 12:1 Kevin 16:20 kind 7:25 9:23 9:25 12:6 17:3 19:1 24:2 25:5 38:3 40:1,12 42:1 57:22 63:13 74:8 kiss-and-tell 12:12 kiss-and-tells 8:13 10:25 12:8,10 knew 3:17 10:8 10:13,16 44:14 know 1:23 3:10 9:2,17 12:14 16:14,20 20:21 21:13 23:1 27:19 31:18 32:8,13,16,24 37:19,20,21 38:4 40:5,8,18 40:22 46:6,19 47:8 48:10 52:25 53:11,13 57:5 60:24 66:17 68:11 74:4 knowing 33:5 41:5 knowledge 4:10 4:24 58:1,1 known 3:4 22:5 knows 53:1	67:8 68:24 legal 10:20,21,22 34:13 36:18 43:14 44:18 54:19 55:9,11 55:22 56:3,8 56:16 63:20 legally 39:16 LEIGH 76:24 lengths 50:12 letter 14:24 57:2 57:16 letting 40:5 let's 25:8,11,11 29:22 30:15 33:11 36:3,20 level 60:17 LEVESON 1:3 1:15,20 2:8,15 3:18 4:12,17 14:9,15 15:2,7 15:12,18,21 16:3 32:15,19 51:18,21 60:12 61:7 64:1,23 65:3,8,11,15 65:17,20,24 67:12,23 69:5 69:8 70:7,15 71:15 72:7,10 73:1,6,13,17 73:21 74:2,6,9 74:22 75:9,24 76:6,11,14 Lextranet 73:18 libel 42:14 56:13 61:14 65:21 libelled 56:10 libellous 49:3 liberties 6:12,13 7:2 10:10 lied 52:21 lies 7:15 26:13 life 25:12,17 51:25 59:12 63:15 life's 9:17 life-threatening 16:15 light 10:3 72:5 Limited 74:21 line 36:11 45:7 lines 72:20 link 62:14 linked 2:23 list 68:22 listened 36:25 listening 76:8 litigation 75:11 75:20 litigious 19:4 61:18,20,21 little 10:23 18:25 38:9 41:10 58:20 live 38:18 lives 24:10	lobby 23:18 lobbying 63:8 local 29:24 location 18:1,14 London 31:12 54:23 long 16:7 32:25 57:3 longer 23:23 68:7 look 11:4 12:1 16:7 18:24 20:7,7,8 22:8 27:25 29:22 31:19 37:4,11 38:3 50:3 54:24 59:21 61:14 63:1,3,7 64:14 70:4,19 73:15 74:6 looked 2:6,22 31:6 70:24 looking 7:3 12:21 21:10 24:1 31:25 32:25 41:2 58:3 looks 2:23 59:20 66:5 72:4 LORD 1:3,15,20 2:8,15 3:18 4:12,17 14:9 14:15 15:2,7 15:12,18,21 16:3 32:15,19 51:18,21 60:12 61:7 64:1,23 65:3,8,11,15 65:17,20,24 67:12,23 69:5 69:8 70:7,15 71:15 72:7,10 73:1,6,13,17 73:21 74:2,6,9 74:22 75:9,24 76:6,11,14 Lords 66:15 Lordship 1:25 Los 11:18 lose 52:17 62:1 losing 45:15 65:1 lost 48:25 52:21 lot 12:17 19:15 19:17 25:16 29:24 45:17,18 lots 7:5 11:11 14:1 17:2 25:3 37:20 60:21 61:5
I idea 6:23 13:20 14:2 41:15 42:10 55:7 ideas 39:22,22 identical 30:9 Ifans 47:6,8,9,13 47:15 ignorant 34:1 illegalities 67:19 illegality 69:23 70:3 illicit 40:4 image 2:2,18 3:17 4:13 images 2:19 11:23,25 immediate 72:8 impact 27:18 impacts 3:21 impart 49:19 imparting 41:20 impinges 3:1 imply 53:14 important 29:20 36:4 45:8 53:3 55:1 59:7 67:5 67:11 importantly 68:25 impossible 69:14 inaccurate 8:13 incidents 16:14 inclined 22:18 included 14:16 including 6:10 16:15 income 17:6 increase 28:17 increasing 7:8 independent 6:7 6:9,19 54:24 59:24 60:25 62:14,15 indicate 39:25 65:18 69:2 indicated 36:5 41:1 48:22	J Jackson 28:9 Jay 70:25 Jefferies 25:16 48:2,4,19,21 Jellema 36:21 37:9 38:13,21 43:11 66:23 67:3,6 68:7 75:21 Jellema's 42:19 43:19 Jenn 19:7,18 20:23 jeopardise 50:22 job 11:8 27:21	L labelling 32:15 32:21 lack 62:3 ladder 28:19 large 9:2 22:22 23:8 larger 5:21 lasts 8:6 law 12:22 16:15 33:17 51:16 71:9,13 laws 7:3 37:19 38:4 56:13 lawyer 26:9 51:15 lawyers 56:3,4 lax 24:4 lead 19:13 learn 28:4 learnt 66:23 leave 5:25 27:21 left 5:22 9:5 10:6 43:11,24 67:2	M machine 29:20 magazines 31:6 Mail 29:10,13,15 30:5,8 64:7,8 Mail's 31:1 majority 55:4			

makers 60:21	62:9	N	22:20 24:13,20	34:7	organisations	74:13
making 1:7 2:25	Menezes 7:14,17	N 76:19	25:4 26:14	obtainable 2:2	54:12 74:25	particular 3:22
7:2 10:8 11:5	mentality 10:1	name 4:4,5 40:23	27:17 28:20	obviously 12:1	75:2	3:22 7:7 8:11
11:10 14:11	mention 20:4	46:4	29:22,22 32:5	19:12 21:10	originally 29:15	17:23 39:13
23:19 48:18	55:18	names 41:12	32:24 38:10	22:17 35:23	ostensibly 34:12	59:4 67:3
59:13 72:14	merely 66:4	Naomi 66:16	42:23 43:4	37:18 39:16	ought 1:15 70:3	particularly 7:24
malicious 22:25	merit 53:9	68:19	53:17 55:18	40:8,18 42:13	outlets 11:24	9:11 12:18
man 7:14	message 43:13	narrative 21:8	62:13 66:7	44:4,5 46:16	output 59:13	22:13,14 37:6
manage 75:12	43:25	nasty 61:17	72:22 74:25	49:21 50:24	outset 58:14	38:24
managed 13:5	messages 44:9,20	national 13:8	newspapers 2:14	55:2 56:1 64:2	outside 18:11	partly 13:8 17:21
18:10 20:11	67:9	30:1	5:17,23 7:16	66:14 75:6	60:2	parts 13:5 24:3
managers 75:7	Metro 18:10	naturally 22:18	18:21 22:23	76:7	overcome 50:5,7	27:17 34:23
manufacturer	Michael 28:9	nature 12:19	23:23 24:6	occasionally	overcoming 50:8	58:11
32:17	mind 2:11 3:20	34:6 52:13	25:19 27:1,4	48:15	overtaking 59:19	party 64:4,9
man's 25:17	23:3,20 33:9	near 50:21	28:17 31:13,23	occasions 5:8	overwhelmingly	passages 39:13
March 35:21	58:16 61:8	necessarily 23:2	34:7 49:25	October 55:12	63:6	passed 2:16 5:7
39:5 66:18,22	mine 43:3	26:3,3	50:18 56:22	70:14,15	Owen 11:15	7:3 38:13 58:9
68:5	minefield 36:18	necessary 5:16	59:21,22 60:5	Ofcom 10:14,15	Owens 44:24	passes 38:6
mark 21:5,16	minor 58:10	58:24 65:9	60:8,19,23	58:6,15,19,21	45:2,8,16	pasted 13:22
mass 26:1	minute 45:22	66:12 69:18	61:8,18,21,23	59:4,10,13,16	48:16,20 50:4	30:10 31:11
massive 47:12	minutes 8:7	70:9 73:4	62:10,11 63:13	59:20 60:2,7	66:23 68:7	pastes 13:15
massively 28:15	15:19 30:7	necessitates	74:14,16,21	60:12	o'clock 76:16	pasting 31:21
46:4	31:22	68:23	newspaper's	Ofcom's 58:22		Patry 1:4,19 4:2
match 26:2	Mirror 5:10	need 15:5,10	18:3	offend 69:20	P	4:3,18 15:4,9
material 5:15,19	27:21 28:24	16:23 20:13	newsroom 25:10	offer 35:1	PA 53:4	15:13,17,19,25
7:22 11:7,12	35:22 44:23	28:2 34:7 36:1	newsrooms 9:1	office 30:4 43:22	page 6:3 18:19	16:4 33:10
14:12,19 32:16	48:13,14,24	38:5 48:5 54:9	26:11	off-record 12:9	31:24 37:12,16	51:19 52:1
40:4 65:18,25	49:4 51:4	54:10 60:17	newswire 30:7	Oh 29:21 30:9	38:14,15 41:7	61:2 62:20
66:5,6,8,25	72:12	62:14 63:19	newsworthy	38:9 40:25	55:14	63:23 64:19,23
68:12 70:4	misleading 66:13	67:22 72:23	22:14	61:7	pages 23:1,2,24	64:25 65:5
71:10,12 72:24	misrepresent	73:8,9 74:11	NHS 46:16,20	okay 21:7 51:10	24:8	67:4 71:1 72:9
matter 31:12	11:21	needed 50:6	nice 38:8 57:1,1	Okaying 14:7	pap 12:2	72:11 73:2
66:7 72:9	missed 57:4	needs 2:11 61:6	57:1	old 32:2	paparazzi 8:12	74:3 76:12
Max 63:17	mixed 57:11,12	62:19	Nick 7:21 13:2,6	once 15:4,10	10:24 11:4,14	77:3
mean 8:24 9:16	Mm 14:14 29:12	Network 11:16	44:24 45:2,16	29:16 44:2	16:5,15,25	Paul 35:3
20:20 37:6	33:20 51:12	never 5:18 31:13	48:16,20 50:4	onerous 58:25	17:5,11	pay 9:3 44:21
48:10 57:11	Mm-hm 8:8,17	34:20 44:14	nominated 6:8	ones 14:4	paparazzis 17:8	49:4
75:5	37:14 39:8,10	53:11,12,12	6:15	online 29:10,18	paparazzo 16:20	paying 22:20
meaningless	mobile 17:1	64:20,22 69:22	nonsense 27:24	61:1 64:8	paper 22:7 41:6	PCC 33:17 34:21
61:11	modern 34:1	74:4 76:2	62:10	onwards 33:12	41:7 46:11	34:23 35:1,4
means 10:17	Mohan 23:14	new 37:19 38:3	normal 75:10	39:6 44:25	66:2 75:7	35:13 42:4,5
32:14 57:13	28:3	61:20 63:19	Northern 9:11	54:2 55:23	papers 57:8	42:12,15,16,17
59:15 60:5	moment 6:22	70:20	note 44:7 46:15	open 37:21	paragraph 6:4	42:22 48:15,25
media 2:4 7:15	8:14 16:17	news 7:11,21 8:6	67:8	opening 37:25	8:2 16:8 17:17	53:12 57:10,16
7:19 8:6 13:6,8	20:12 51:9	9:3,24 11:16	noted 46:20	39:15	18:16,24 19:9	57:20 58:17
13:19 15:15	73:10	11:24 13:4,5,7	notes 24:8 67:1	operate 8:12	22:8 33:12,15	59:21 60:13
24:3 54:12	money 12:16	13:15,16,22	notice 46:13	9:18 23:17	35:6,19 39:6	61:3,6,10 62:1
55:5 69:13	22:19 24:14	14:4 18:13	noticed 2:18 6:19	40:16	40:13 41:10	62:1,4,5,13
medical 8:16	31:3 41:9 61:9	24:3,24 26:23	18:17 21:5	operation 46:3	43:10 44:25	66:4 69:3
10:25 12:20	months 58:9	27:1 29:1,15	notices 72:16,19	46:17	45:13,21 46:10	75:22
33:11 34:10	70:16	29:17,20,24,25	73:5	operations 34:1	46:13,14 47:5	pedantic 31:15
35:10,16 36:6	Moodie 28:23	30:2,6,9,11,13	NOTT 76:20	34:5	47:20 54:1	penalties 59:2,14
38:7 47:23	More4 6:16 58:5	31:2,16,17	November 72:12	opinion 59:1,1	55:12 56:22	61:12
49:1,25 50:19	Morgan 27:19	32:1 35:21,22	73:12,20,24	opportunity	57:10 58:4,17	pence 24:13
53:18,22 55:16	morning 2:5	36:23,24 39:1	Numar 49:12	66:20 72:15	71:10	people 5:10 8:25
55:18 57:21	59:23	39:19 41:11,15	number 4:18	74:24	paragraphs 6:24	9:9,15,16 12:2
68:18	Mosley 63:17	41:18,25 43:14	6:10 28:22	opposed 71:18	parity 60:18	13:13,21 17:2
meet 38:7,19	most-read 31:1	43:23 44:18	49:24 51:9	opt 34:17	park 49:15	21:2,23,24,24
39:4	motivated 22:17	45:10 46:22	52:4,15 56:22	option 10:6	parlance 57:12	21:25 22:13
meeting 5:11	mouthng 44:16	48:11 49:10,18	62:4 69:12	order 2:25 22:19	Parliament 35:5	24:18 25:10
44:24 49:9	move 28:6 29:6	53:5 55:24	nurse 34:3 53:17	34:8 56:17	part 8:11 17:11	26:7 28:4 30:3
meetings 4:21	moved 49:6	56:1,4,18	nutshell 36:4	65:6,12 66:8	17:17 22:6	35:23 36:20,22
5:3 35:24 60:1	movie 54:12	59:25 64:5,5		66:12 68:12	35:13 59:12	36:24 37:20
61:9 66:22	MP 35:8	64:11,17 67:6	O	73:4	66:10 74:24	39:23 40:22
member 40:16	MP's 63:3	75:25 76:1,4	objective 31:19	ordinary 75:20	parti 71:6	43:23 44:13
71:20	murderer 48:23	newspaper 13:14	obsessed 48:21	organisation	participants	45:19 48:14
members 17:5,7	Murdoch 7:6	13:14 20:2,8	obtain 33:17	45:12	48:7 72:1	51:4 54:9,11

54:22 55:5 60:2 61:5 62:6 62:6 74:20 Peppiatt 27:4 28:6 perfectly 61:5 70:8 75:13 period 8:3 18:21 19:8 55:10 person 26:16 61:24 personally 57:22 persuasive 1:24 Pete 12:3 phone 17:1 26:6 36:12,19 44:21 46:16 photo 21:5 23:8 photograph 21:16 photographers 17:3 photographing 16:10 photographs 2:12 photos 27:23 32:9 phrase 13:2 46:14 physics 19:12 50:24 pick 52:11 picked 14:4 17:22 29:17 pick-up 55:20 picture 1:10 pictures 17:2 piece 23:6 46:11 Piers 27:19 pipeline 41:24 pitched 29:15 place 16:18 64:21,22 68:5 planted 26:20 plastic 33:25 34:3 50:25 playing 7:7 please 4:3 15:14 37:10 49:16 54:5 55:22 65:17 pleasure 6:2 pm 1:2 15:22,24 76:15 poetry 48:22 point 12:1 24:5 29:13,19 32:12 36:13,16 41:22 42:3 45:8 49:5 49:16 66:10 69:7 71:7 73:1 police 7:13 policy 9:12,19 political 23:18 23:20 politician 13:12	pose 33:24 position 67:14 68:13 69:21 74:13 75:3 possession 40:4 possible 2:4 47:4 68:13 70:4 71:2 72:6 73:25 possibly 38:8 59:15 62:9 potential 42:13 potentially 45:15 45:25 Pottinger 33:7 59:23 PR 19:6,24,24 25:24 26:4,11 27:12 29:21 31:14 32:3,3 32:24 64:11 practise 27:2 practices 8:23 precisely 68:10 68:13 prepared 1:24 4:7 71:19,23 presented 23:4,5 44:13 presenting 23:21 presently 2:24 presents 13:16 press 7:6,6,18,23 10:16 13:3,13 13:21,23 14:3 30:1 31:17,21 32:4 33:3,6 42:8 55:21 57:6 62:15 67:18 71:5 pressure 44:5,6 presumably 7:12 41:11,18 pretending 20:24 64:11 pretty 9:5 36:19 prevent 56:11 prevented 24:6 previous 10:10 price 9:4 prima 7:22 principle 5:14 print 34:8 56:23 57:4 61:17 printed 7:16 17:22 25:5 48:4 51:3 56:22 57:9 printing 24:6,21 28:25 41:16 50:22 pris 71:6 prisoners 27:24 privacy 35:9,13 36:14,15 37:19 38:4 42:14 56:2 63:2	private 33:18 36:16 38:7 51:25 63:15 privilege 71:9 probably 9:8 23:8,9 26:18 31:9 35:25 39:9 47:17,18 48:5 54:9 58:23 problem 22:23 47:11 50:7 60:20 68:4 70:19,20 problems 26:25 54:3,6 55:23 proceed 38:10 proceedings 65:20 process 13:3 46:21 produced 6:6 22:11 producers 44:8 product 33:2 professional 10:12 53:22 professionals 45:19 profile 34:4 profit 22:17 programme 9:22 60:6 prohibits 34:10 promoted 27:17 promotes 2:7 promoting 31:24 proof 34:7,9 40:12 proper 63:22 properly 27:22 71:14 proportion 25:3 proportionate 10:7 proprietor 74:19 proprietors 9:21 74:23 76:3,8 prosecuting 63:5 protect 50:12,14 protecting 50:10 protection 3:3,11 34:10 41:20,22 42:3 49:21 53:6 63:3,4 66:4 prove 31:8 43:17 46:12 51:1 provide 43:15 68:15 provided 4:6,18 5:12 31:14 32:10,17 provides 65:6 PRs 26:1,5,16 prurient 63:19 public 2:17 3:6	5:15,19 7:9 9:2 9:3 10:18 13:4 13:9,9,16 17:5 17:7 18:8 24:22 25:2,3,6 26:22 31:17,18 32:8,22,23 33:8,19 34:18 34:21 35:9 37:20 41:21 45:22,24 46:1 46:2 47:10 48:12 49:20 51:8 52:1,3,8 52:12,13,21,24 53:10,19,23 59:8 62:9,22 62:24,25 63:1 63:6,10,10,18 63:21 66:9,11 66:12,13 68:15 73:10 publication 1:16 52:23 publications 9:10 publicise 13:23 publicly 57:3 publicly 2:18 56:12 public's 32:12 publish 51:10 52:3,20 published 22:22 29:10,18 64:17 65:13,13 publishing 50:19 64:14 pulled 54:20 punched 27:10 punished 27:16 purchasing 34:25 Purifiers 6:10 pursue 43:24 67:10 push 42:16 55:2 put 5:15,18,20 7:15 9:9 12:16 14:12,13 15:18 19:23 20:5,10 20:17 21:17 22:6 23:7 24:20 25:1 26:13 27:11 30:7 32:1 36:19 37:3,7 40:23 43:2 46:7 54:23,25 61:15 62:8,12 64:2,3,5,13,19 66:10 puts 13:15	50:24 question 2:22 4:12 5:17 12:5 23:6 30:13 32:15 35:14 51:21,22 62:24 63:5 64:19 70:11,23 71:17 73:15 74:10,15 76:9 questioning 63:9 67:4 questions 4:2 15:13 16:4 36:1 53:24 63:25 67:5 72:20 76:21,23 76:25 77:3 quick 36:11 quickly 11:3 28:6 30:12 quite 14:21 17:9 18:2 27:16 29:24 31:2,7 32:2 36:1,10 37:20 40:7,15 43:8 46:14 50:13 56:1 58:23 69:5,14 74:11 quote 19:14,18 19:25 23:14 quotes 19:21 27:13 35:2	R raids 7:10 raise 71:17 74:10 76:13 raised 69:12 raises 66:11 ran 11:15 19:13 27:10 28:24 53:5 55:4,13 55:15 rare 43:4 rarely 9:20 22:14 reaction 57:10 read 7:21 11:19 15:1 19:17 20:20 32:6,23 33:1 36:11 71:21 readers 13:11 23:4 readership 34:20 40:5 41:2,5 reading 11:20 real 24:23 26:23 33:21 realising 20:9 really 7:18 9:1 17:2 29:1 32:7 36:13 42:6,8 47:22 49:8 54:22 55:1	59:7 61:11 realms 18:7 reason 2:17 3:22 30:6 45:1 71:16 reasoning 66:15 reasons 1:20,23 4:13,15 7:3 74:11 recall 68:10 receive 70:8 received 32:20 reckon 25:10 recognise 50:1 recollection 20:19 44:1 record 4:4 5:7 8:22,25 9:9,21 10:2 23:10 43:8 68:23 records 8:16 10:25 12:20 33:11 34:11 35:11,16 36:6 49:1,25 50:20 52:2 55:16,19 57:21 refer 6:23 52:15 referred 8:16 referring 48:9 reform 61:3 reformed 61:6 refusal 10:3 refused 64:7 regard 27:15 regarded 36:17 regarding 64:6 Regardless 53:2 regimes 60:12 regulated 60:16 regulation 32:2 regulations 10:15 58:16 regulator 43:5 58:19,22 60:19 regulators 60:18 regulatory 59:19 regurgitated 48:19 13:4 rejected 29:16 relation 3:4 64:9 67:18 68:13 69:10 relations 13:4,9 13:9 release 13:3,13 31:17,21 32:4 33:3 54:1,2,10 57:6 released 6:14 8:3 54:18 56:21 releases 13:21,23 14:3 33:6 releasing 54:18 56:11 relevance 8:5 70:23 71:3	72:5 relevant 14:19 14:22 34:23 39:13 40:14 58:11 71:1 76:2 reliable 12:18 rely 24:10 remarkable 20:10 remarkably 20:1 remarks 39:15 remember 9:11 23:3 62:7 remembering 70:19 remind 1:8 67:22 repeated 16:14 71:11 reported 21:9 43:22 reporter 39:3 reporting 22:24 23:20,21 25:15 34:2 45:25 46:2 represent 74:13 representation 74:18 representative 42:25 representatives 69:13 represented 75:1 representing 74:17 75:1 reputation 13:25 request 3:22 4:14 5:20 requested 3:3 requests 9:9 required 74:18 research 34:11 researched 18:1 researcher 17:19 19:1,19 researching 48:19 resolve 67:12 respect 65:22 66:1 71:4 respective 25:24 respond 72:15 responded 70:18 response 70:9,19 responsible 62:18 rest 7:19 23:12 restaurant 20:15 21:10 22:4 restaurants 21:2 21:25 restriction 1:16 restrictions 42:14 restrictive 75:19 result 49:8
--	--	--	---	---	---	--	---

results 55:16	running 19:5,22 28:3	73:16	43:16 44:11	sorts 7:15,23 9:10	4:19 6:3 14:16 14:16,23 16:8 17:12,17 18:16 22:8 25:23 33:13 39:7 42:19 43:19 44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	struck 48:20,23
return 49:16	runs 14:25	seeking 68:20 71:24	52:13	sought 3:11	22:8 25:23 33:13 39:7 42:19 43:19 44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	structurally 22:11
returned 43:22	Rush 16:20	seen 1:18 16:6 20:23 29:8 35:23 42:19 43:19 53:22 54:7 69:6,7,8	simple 61:5	sounded 14:2	42:19 43:19 44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	stuck 28:25
revealing 19:10	Ryvita 53:21	43:19 53:22	simply 71:23 72:23	sounds 38:16 43:2	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	students 57:14
review 57:5	S	54:7 69:6,7,8	single 28:16 43:6 69:15,19	source 21:18,18 26:17 32:14 33:6 40:6 45:15 50:10,12 52:25 53:2,3	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	studio 73:2
reviews 56:23,23 57:8,9,12	sacred 53:18	sees 66:14 68:19	sir 1:4,7 15:4,17 15:25 64:19,25 72:9	sourced 13:9,16 32:24	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	study 13:7
revisits 47:13	sadly 59:3 63:11	self-correct 61:23	sit 1:6 60:2	sources 12:19	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	stuff 32:16,19 37:21 60:15
rewarded 27:16	safeguard 72:3	self-explanatory 8:18	site 30:11 59:25	sourcing 12:23	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subject 45:24
Rhys 47:5,8,9,13 47:15,17,17,18	sake 74:6	self-serving 50:13 62:12	sitting 29:23 30:3 60:3	sparkle 29:2	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	submission 2:10 64:2 65:16 71:13 72:23
Richard 6:7 27:4 28:6	sale 34:10 36:6	sell 31:5 33:22	situation 11:17 17:10 37:2	speak 8:21 11:17 31:4 42:5,17 48:18	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	submit 67:25 70:1
rid 47:15	sanctity 68:17	selling 11:23 22:16 33:25 53:17 55:14	situations 11:21	spears 11:17,21 16:11,13 17:10	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	submitting 70:1
ridiculous 21:14 22:2	Sarah 19:10	send 13:14	six 18:20 19:6	specific 44:7 58:20 67:15 72:17 73:7	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
riff 21:6	Sarah's 19:16	senior 45:11	sixteen 6:8	specifically 11:10 40:14 54:13	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsidiaries 76:2
right 1:15 3:18 3:25 4:8 9:2 15:6,12,21 16:3 17:25 20:19 29:11,18 30:20 31:18 32:12 33:10 36:22 38:16 42:9 45:9 47:3 58:13 69:20 70:9 72:18,19 74:19 76:9	satellite 71:18	sense 3:1 66:12	Sixteen 6:8	speech 23:16	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subterfuge 10:5 10:7,17
rights 7:4 55:3 58:5	satisfactorily 75:13	sensitive 34:22	skip 38:14	speed 70:5	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequent 19:3 49:3
rigid 3:4	saw 7:13,18,19 7:21 16:14 17:18,18 19:12 20:14 29:8 30:25 63:17 74:4	sent 12:13 14:3 30:6,8 31:10 31:11	slap 75:22	spending 24:12	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
rigorously 29:1	saying 25:9 31:13 38:2 43:6 46:1 56:9 57:18 75:15	series 6:6 14:3	sleep 12:15	spent 32:25 41:8	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
rigours 23:12,20	says 38:15 42:22 43:22 45:9 46:15 57:6 62:8 67:6,19 71:10 75:16	serve 13:10,11 73:25	slight 21:5	spere 63:12	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
ring 17:20 18:5	Schillings 61:22	service 33:2	slightly 68:15	spice 29:2	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
rise 15:5 28:19	Scott's 20:15,19 20:21,23 21:19	servicing 72:16	slipping 25:6	spin 21:11	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
risk 59:15	screen 1:18 48:6	session 1:9	slow 36:2	spirit 71:23	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
risked 51:7	screened 6:16 70:13	set 4:14 10:12,17 34:23 49:17	small 21:16	spoke 30:18 36:21,23 37:9 39:20 41:11 49:25 52:2 57:13 64:10,10 64:12	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
risks 42:11	search 2:3	sets 45:23	smart 19:16 23:7 28:20 32:22	spread 24:2 27:1 27:2 39:23	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
Ritchie 20:14,23 21:9	second 17:15 18:19,19 19:9 28:23 38:1	set-up 12:23	Smart's 19:13	stab 22:1	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
rogue 39:2 44:17	secondly 8:12	sever 62:14	smear 25:18	stack 18:13	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
role 7:7	secretly 19:11 50:23 59:24	Shell 9:11	smearing 7:11	stacks 60:25	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
room 1:11 14:18 48:7 53:18	section 8:6 11:14 11:19 15:15 37:16 56:11 67:15 68:14,14	she'd 52:16,18	Smith 73:19	staggering 20:1	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
rooms 14:4	sections 5:21 22:22	shield 40:2	sniffing 31:2	stand 24:19 25:7 25:7	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
ROSE 76:22	see 1:14 2:5 8:14 12:21,24 14:4 14:17 17:2,6,7 17:9,21 18:12 24:19 28:25 32:25 33:16 37:12,15 52:12 53:19,21 56:19 57:6,7,7 60:20 65:9,12 66:5,8 68:3 69:5 71:21 72:24	short 12:25 15:5 15:16,23 55:10 60:1	soho 12:2	standard 10:12	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
route 69:9,10 71:25	sections 5:21 22:22	show 6:21 8:9,19 11:2 12:25 14:8 29:19 61:10	Soho 12:2	standards 13:19 24:4 27:1	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
ruin 24:9	see 1:14 2:5 8:14 12:21,24 14:4 14:17 17:2,6,7 17:9,21 18:12 24:19 28:25 32:25 33:16 37:12,15 52:12 53:19,21 56:19 57:6,7,7 60:20 65:9,12 66:5,8 68:3 69:5 71:21 72:24	showing 1:13 19:21	soldiers 27:23	Star 23:25 27:9 28:8 29:10	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
ruined 25:12	see 1:14 2:5 8:14 12:21,24 14:4 14:17 17:2,6,7 17:9,21 18:12 24:19 28:25 32:25 33:16 37:12,15 52:12 53:19,21 56:19 57:6,7,7 60:20 65:9,12 66:5,8 68:3 69:5 71:21 72:24	shown 15:11,15 15:16 48:6 58:15 60:8 61:10	solely 42:22	STARS 56:25	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
ruins 62:5	see 1:14 2:5 8:14 12:21,24 14:4 14:17 17:2,6,7 17:9,21 18:12 24:19 28:25 32:25 33:16 37:12,15 52:12 53:19,21 56:19 57:6,7,7 60:20 65:9,12 66:5,8 68:3 69:5 71:21 72:24	shows 26:11	solutions 25:22	Starsuckers 2:7 6:21 7:1 15:15 28:22 54:2	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
rule 32:5	see 1:14 2:5 8:14 12:21,24 14:4 14:17 17:2,6,7 17:9,21 18:12 24:19 28:25 32:25 33:16 37:12,15 52:12 53:19,21 56:19 57:6,7,7 60:20 65:9,12 66:5,8 68:3 69:5 71:21 72:24	showing 1:13 19:21	somebody 2:21 46:3 75:15	start 27:3,5 33:11 36:3 45:9 47:2 58:3 74:14 75:15	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
ruled 3:16,24	see 1:14 2:5 8:14 12:21,24 14:4 14:17 17:2,6,7 17:9,21 18:12 24:19 28:25 32:25 33:16 37:12,15 52:12 53:19,21 56:19 57:6,7,7 60:20 65:9,12 66:5,8 68:3 69:5 71:21 72:24	shown 15:11,15 15:16 48:6 58:15 60:8 61:10	sort 9:18,25 10:5 10:15 11:12,18 12:11,13 13:18 13:25 18:6 20:4 23:5 24:1 24:3 31:24,25 36:17 37:17 38:2 39:21,22 40:4 45:6 50:21 52:9 55:8,9,9,10 58:22 59:5 60:9 62:18 63:13	statement 4:6,9	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
rules 34:1 38:12 45:3 49:17	see 1:14 2:5 8:14 12:21,24 14:4 14:17 17:2,6,7 17:9,21 18:12 24:19 28:25 32:25 33:16 37:12,15 52:12 53:19,21 56:19 57:6,7,7 60:20 65:9,12 66:5,8 68:3 69:5 71:21 72:24	shows 26:11	sorts 7:15,23 9:10	state 4:4 52:2	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
rumour 24:7,9 24:11,16,20,23 25:9,10,11,13 25:16,18,20	see 1:14 2:5 8:14 12:21,24 14:4 14:17 17:2,6,7 17:9,21 18:12 24:19 28:25 32:25 33:16 37:12,15 52:12 53:19,21 56:19 57:6,7,7 60:20 65:9,12 66:5,8 68:3 69:5 71:21 72:24	shows 26:11	sought 3:11	statement 4:6,9	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
rumours 24:25	see 1:14 2:5 8:14 12:21,24 14:4 14:17 17:2,6,7 17:9,21 18:12 24:19 28:25 32:25 33:16 37:12,15 52:12 53:19,21 56:19 57:6,7,7 60:20 65:9,12 66:5,8 68:3 69:5 71:21 72:24	shows 26:11	sounded 14:2 43:2	statement 4:6,9	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3
run 11:3,16 18:9 19:3,8 23:1 27:20 30:15 32:13 44:3,15 54:21 59:9 61:24	see 1:14 2:5 8:14 12:21,24 14:4 14:17 17:2,6,7 17:9,21 18:12 24:19 28:25 32:25 33:16 37:12,15 52:12 53:19,21 56:19 57:6,7,7 60:20 65:9,12 66:5,8 68:3 69:5 71:21 72:24	shows 26:11	sounding 12:23	statement 4:6,9	44:2,25 48:5 58:17 71:11 72:14 73:12,23 73:23	subsequently 19:3 49:3

39:11,15 40:11 40:11 65:22 70:7 surgery 33:25 34:3 42:1 43:16 50:25 52:17,24 surprising 68:9 suspects 7:12 switched 1:9 15:10 sworn 1:7 76:22 system 58:18	television 10:11 58:15,22 59:17 59:20 60:4,22 tell 5:12 6:25 8:2 8:4,25 13:1 19:9 22:8 24:12 26:22 28:2 40:17 45:4 46:17 54:1 55:22,23 55:24 56:21 58:4,19 60:23 73:19 telling 28:7 tells 32:17 tend 42:11 term 63:10,15,19 terms 45:23 51:24 52:5 61:11 66:3 terror 6:14 Tesco 32:7 test 33:16 thank 4:3,17 15:2,25 63:23 63:24 64:1,1 64:24 70:15 73:10 74:8,9 75:24 76:14 thanking 57:2 they'd 30:7 40:24 49:5 50:14 57:3 thing 17:15 21:14,23 32:3 40:8 47:21 51:9 61:8 62:3 62:22 things 10:2 11:9 24:19 29:23 48:15 49:24 52:11 59:8 61:15 think 2:5 5:11,17 5:25 6:18 8:15 9:1,23 10:6 11:3,15,20 12:5 13:2,6 14:21,22,22 15:25 17:14 18:10,24 20:13 21:8,15,22 23:23 24:5,10 24:12,16,18,18 24:23 25:3,6 25:15,18,19 26:25 27:2,12 28:4 29:9,13 29:21 30:16,24 31:2,9,16,17 32:3,6,11,22 33:6 35:8,9 37:25 38:2,24 39:2,13,17 41:1,6,13 42:5 42:7,11,16,17 43:8 44:12,16	45:6,7,8,10,23 47:8,25 48:10 49:5,12 50:7,9 50:25 51:3,10 51:14,16,18,21 51:22 53:3,8 54:8 55:7 58:23,24 59:3 59:3,16 60:24 61:5,9 62:3,5 62:10,10,11,14 62:24 63:10,15 63:18,18 64:8 64:18,19 68:11 71:22,23 73:4 73:8,17 74:15 74:20 75:9 76:12 thinking 47:13 thinks 32:7 third 64:4,9 thirdly 8:13 thought 7:25 11:13 14:2 19:2 21:6,6 31:6 36:9 40:15 48:18 56:25 57:23 61:18 72:8 74:25 thoughts 26:24 threats 55:9,11 three 27:19 36:13 56:16 60:12 76:2 three-quarters 37:15 thrive 27:7,7 thrust 57:19 Thursday 76:14 76:17 tick 47:9 time 6:16 15:5 16:13 18:11 20:5 30:14 31:2,10 35:3 41:8 42:24 44:8 55:10 57:3 70:21 Times 57:17 tipped 53:4 tipping 32:11 tip-off 32:20 titles 75:12 76:2 24:23 25:3,6 today 9:22 63:8 71:11 74:14 today's 60:25 told 37:6 43:23 67:7 Tom 36:23 39:20 56:12 top 18:19 32:2 37:11 70:17,21 topics 53:25 totally 60:25 toto 66:19	touch 38:9 49:9 51:9 61:19 64:13 tough 16:25 58:22 traced 66:15 track 65:1 trailing 17:8 trained 17:3 transcribed 66:19,25 transcript 5:6 11:20 37:4 39:5 transcripts 4:20 4:24 5:2,9,13 66:20 73:22 treatment 68:18 68:18,20 trenchant 66:3 trespass 16:16 trial 28:9 trick 63:21 tricking 41:2 tried 8:20,24 9:15,16 18:24 19:2 54:22 56:17 61:15 true 4:9,15,24 6:17 9:14 20:7 20:18,18,20,25 21:1,3 23:9 24:10,12 25:8 25:11 26:15 29:1,19 30:10 31:20 34:8 51:2 53:8 58:4 61:25 Trust 13:19 trusting 31:18 truth 18:5 22:19 26:17 try 8:21,25 19:2 63:14 trying 10:8 11:22 17:19 31:8 41:23,24 49:1 49:17 tuck 47:7,15 tummy 47:7,9,15 turmoil 16:13 turn 4:22 6:2 17:11 33:10 35:19 36:20 37:9 44:23 63:17 turned 7:17 9:10 41:3 turns 61:25 TV 55:3 58:5 59:22 60:8 TV-esque 60:6 twice 36:2 Twitter 24:16 43:2 two 5:9 6:9 8:3 8:25 9:8 11:6	15:4 18:16,19 20:4 26:2 35:10 42:13 49:23 53:25 60:4,18 68:5 two-week 18:21 19:7 type 16:21 types 3:3,11 42:13	U UK 16:21,22 ultimately 70:5 unable 43:7 unaware 60:16 uncut 58:10 undercover 60:1 61:9 63:7 underhand 25:5 underlying 72:24 understand 5:18 15:20 24:5 30:3 36:24 45:17 61:8 62:9,11 64:9 65:1 67:14 70:12 71:3,15 72:7,7 73:1 74:12 75:18,24 understanding 32:2 understood 74:12,16 unedited 5:15,19 71:9 United 16:18 University 13:6 57:14 unnecessarily 31:14 unregulated 60:11 unreliable 26:5 26:17 unsubstantiated 24:15 unsuccessfully 56:17 unusual 22:15 unwilling 7:20 upset 6:20 56:1 upshot 56:14,16 use 10:5 31:14 56:13 58:19 usually 22:12	verbal 49:19 verbally 41:20 verbatim 5:2 verification 24:17 verified 13:17 verify 24:19 version 72:13 74:2 video 2:6,12 60:20 61:1 66:21 73:8 view 24:5 31:15 36:13,16 41:22 42:8 43:5 45:5 45:24 51:13 52:5 58:18 60:17 63:1 72:22 75:13,19 viewed 61:13 viewer 60:14 viewers 13:11 views 42:22,23 42:25 43:3 73:9 violence 16:17 16:25 17:9 visual 3:5 voice 3:5 voicemail 43:11 43:25 44:20,21 67:8 68:24 voicemails 67:2 67:9 voted 28:21,22	W wait 17:21 waitress 20:24 wall 9:25 Walsh 4:1,5 77:1 want 1:8 4:23 6:3 15:18 16:7 17:15 24:15 29:2 30:22 32:23 33:13 36:9 37:4 40:8 40:11 42:1 50:14,21 54:5 55:6 67:25 72:11 wanted 3:16 10:11 12:17 13:23 15:3 21:6 29:13 33:15 41:12 52:10 54:8 56:10 75:2 wanting 47:9 67:10,23 wants 39:11 Wapping 9:14 war 6:14 warming 28:11 wasn't 3:23 12:3 12:18 19:3 23:4 29:14	31:7 40:20,24 51:19 55:4 56:6 72:18 73:19,20 76:8 watch 60:4 73:3 watching 60:15 water 59:5,8 wave 37:19 38:3 way 2:21 5:23 8:10,12,20 17:7 23:17 25:5 32:4 36:8 37:15 42:6 46:24 61:13,21 65:24 wealth 7:22 website 1:12 2:4 3:7 13:20 18:3 21:22 22:5 31:1 64:15,16 73:18 websites 28:18 week 43:10 56:17 73:12 weeks 69:11 weighed 37:3 weight 52:18,22 53:11,14 WENN 16:9 went 3:6 6:11 12:7 27:20 35:5 48:1,11 50:25 53:12,12 56:20 weren't 12:16 54:11,12 we'll 4:21 6:1 8:9 8:14 10:14 30:23 45:22 53:12 56:19 76:10 we're 1:13 6:21 9:15 12:23,25 37:17 38:11 45:3 46:21 47:5 52:20 54:25 59:6,7 72:12 we've 1:12 4:7 16:6 29:8 32:20 35:23 37:18 42:7 61:9 66:19 69:6,8 whack 25:11 30:23 whatsoever 33:23 55:21 whereabouts 38:17 whispering 20:12 wholesale 41:17 wholly 13:8 50:9 widely 3:17 59:1 wider 70:11 wife 30:18 31:4
--	--	---	---	--	---	---	---	---

wild 24:15	<hr/> X <hr/>	4.23 76:15			
willing 33:17	X 76:19	45 44:25			
wine 22:4		47 45:13			
Winehouse 27:9	<hr/> Y <hr/>	48 45:21 76:24			
Winter 6:11	yeah 17:25 18:6	76:25			
wire 30:10 31:11	18:13,24 19:6	49038 37:11			
64:5,12,17	32:18 38:16,20				
wired 60:3	43:12,21 48:10	<hr/> 5 <hr/>			
wires 30:23	50:3	5,000 54:17			
withstand 10:16	year 14:5 28:21	50 24:13 32:11			
witness 1:4,17	28:23 59:11	46:10			
3:4,10 4:6,9,19	63:8	51 46:14			
6:3 16:21	years 6:6,8 8:3	54 13:7			
17:12,17 25:22	8:25 9:16 11:6	55 68:14			
44:2,25 48:4	20:4 68:5	56 47:5			
71:11 72:13		59 47:20			
73:11	<hr/> 1 <hr/>				
witnesses 3:2	1 6:4 72:12 76:20	<hr/> 6 <hr/>			
71:25	76:21	6,000 14:25			
Woman 6:11	10 16:8 76:16				
women's 31:5	100 55:12	<hr/> 7 <hr/>			
won 6:9	104 55:23	71 39:6			
word 5:7 30:8,9	106 77:1,3	75 40:13			
50:4	108 71:10	77 41:10			
wording 68:15	12 6:6	79 43:10			
words 3:23 6:24	124 56:22				
14:25 30:21	127 57:10	<hr/> 8 <hr/>			
32:16,21 70:16	132 58:4	8 76:17			
work 3:12 14:1	146 58:17				
37:21 45:18,19	15 55:12	<hr/> 9 <hr/>			
62:10,11 64:2	17 17:17	96 54:1			
worked 34:3	18 76:22,23				
56:7					
working 6:5 8:23	<hr/> 2 <hr/>				
14:21 38:25	2 6:24 37:10				
42:24 56:9	2.00 1:2				
works 48:17	2.53 15:22				
world 7:11 9:24	20 35:21 66:18				
11:16 16:25	20s 6:6				
35:22 41:15	2002 6:8				
49:10,18 53:5	2007 6:14				
55:24 56:1,4	2008 6:15				
56:18	2009 8:3 35:21				
worst 47:25	39:5 55:13				
worth 11:20	68:6 70:14,15				
wouldn't 23:9	2011 76:17				
40:5,17,22,23	21s 18:16				
49:2,7 53:6	22s 19:9				
56:13 62:17	23 18:24				
69:20 73:25	24 22:8				
wrist 75:22	26 39:5 66:22				
write 13:13 48:1	28 73:12,20,24				
48:15					
writer/director	<hr/> 3 <hr/>				
6:16	3 6:24				
writing 28:7,8,10	3.00 15:24				
written 40:10	30 8:7 33:12				
49:2,7	31 33:15				
wrong 7:17	31991 48:7				
37:24 59:12	32 68:14				
wrongdoing 7:20	34 35:6,7				
7:23	35 35:7				
wronged 62:7	36 35:19				
wrote 22:6 26:13					
48:20 57:8,16	<hr/> 4 <hr/>				
72:12	4 8:2 39:5 55:2				