

<p>1 Monday, 9 January 2012 2 (10.00 am) 3 (Proceedings delayed) 4 (10.12 am) 5 Housekeeping 6 LORD JUSTICE LEVESON: Before we start the evidence sessions 7 for 2012, it seems to me to be worthwhile to raise 8 a number of what might be described as housekeeping 9 points following the evidence prior to Christmas. 10 The first topic concerns the wider questions. Going 11 back to the morning of 16 November, it may be recalled 12 that following Mr Rusbridger's opening submissions on 13 behalf of the Guardian, which was the last set of 14 submissions from a core participant that was 15 a newspaper, I raised a series of questions. They can 16 be found in the PDF transcript for that morning between 17 page 38, line 14, and page 44, line 23. These questions 18 were not simply addressed to Mr Rusbridger but to all 19 core participants, and I wanted to remind everyone about 20 them, because as we move through the titles in the next 21 week or so and then on to other areas, including the 22 PCC, I want to ensure that everyone has responded to the 23 concerns that I raised. 24 The detail is in the transcript, but the topics 25 were: first, the issue of anonymous evidence of culture.</p> <p style="text-align: center;">Page 1</p>	<p>1 with the question whether the issue of state regulation 2 and self-regulation was a binary choice. 3 Finally, the last topic, which has not yet been 4 addressed at all but will only emerge in hearings later 5 this year, is the issue of competition plural plurality. 6 As to these issues, I asked for the assistance of 7 all, not merely Mr Rusbridger. I would be grateful if 8 they could be addressed, along with any other general 9 issues the core participants consider need to be 10 considered in preliminary form by the end of the 11 evidence on module one, which is due to be 9 February. 12 I anticipate that I will be forming views on these 13 issues while the other modules are proceeding, so that 14 by the time I come to module four, the future, I can 15 provide something by way of emerging findings, which can 16 inform any further seminars and the final submissions 17 that I intend to come to before the summer. 18 I will not hold core participants to any preliminary 19 views which they seek to advance in their final 20 submissions but I am keen to obtain as much as 21 assistance from all at every stage. In that way, I am 22 seeking to pursue the collusive nature of this Inquiry. 23 The second topic concerns Mr Sherborne, who on the 24 same day, 16 November, in the morning, page 54, line 17, 25 promised to provide the Inquiry with written submissions</p> <p style="text-align: center;">Page 3</p>
<p>1 That was subsequently argued and the ruling is subject 2 to judicial review, to be heard later this week, 3 although I have, of course, already heard some evidence 4 based on hearsay, which goes both ways. 5 The second issue concerned the arguable differences 6 in views about ethical propriety and culture in 7 different types of newspaper. That was concerned with 8 the criticism of the availability of expert assessors 9 from the tabloid and mid-market papers. Nobody has yet 10 suggested that there is or should be a difference of 11 approach, although the subject matter may be different. 12 The third issue concerned safeguards for journalists 13 exercising moral choices, a so-called conscience clause 14 and the possible impact of such a provision. The fourth 15 related to issues of oversight and governance, along 16 with a definition of the test of public benefit. The 17 fifth was the question of pre-publication notification, 18 which linked to the sixth: the possibility of some 19 arbitral system cheaply and simply to resolve some 20 issues of privacy or libel and perhaps pre-publication 21 notice. 22 That was also linked to what I will call the seventh 23 issue, which concerned the involvement of those who were 24 not presently part of the PCC and wider news 25 promulgators such as to be found on the Internet, along</p> <p style="text-align: center;">Page 2</p>	<p>1 before the evidence started on the following Monday 2 concerning legal issues as opposed to evidential ones, 3 and I think I am still waiting. If anybody else wishes 4 to do the same and supplement what has previously been 5 provided, I would be equally grateful. 6 The third general topic concerns the evidence moving 7 forward. So far, all the material which I've received 8 has taken the form of written statements supplemented by 9 oral evidence. That has largely been because of the 10 significance of what the witnesses wished to recount but 11 it will not be possible to continue that approach 12 irrespective of the circumstances. A large number of 13 witnesses have provided a large quantity of evidence of 14 a formal nature, written compliance procedures and 15 written mechanisms for governance and oversight, along 16 with other material which forms an essential part of the 17 background but which is not considered contentious. 18 I say immediately that I am very grateful to 19 everyone who has submitted material, whether under 20 compulsion or otherwise, for the very real care that has 21 been taken to put it together. Given the constraints of 22 time, however, it will not be possible for it all to be 23 the subject of oral evidence, and I will have a number 24 of statements formally submitted into evidence before 25 the Inquiry and then published on the website, some but</p> <p style="text-align: center;">Page 4</p>

<p>1 not all of which may be summarised.</p> <p>2 The failure to call the maker of the statement is</p> <p>3 not intended to be discourteous and neither does it mean</p> <p>4 the evidence has less significance. It's merely that</p> <p>5 the material will speak for itself and does not require</p> <p>6 oral elaboration. All the material put into the Inquiry</p> <p>7 record will be considered, as will a summary of the</p> <p>8 contact made with the Inquiry through the website or</p> <p>9 otherwise by members of the public.</p> <p>10 The fourth topic concerns the evidence surrounding</p> <p>11 the hacking into the telephone of Milly Dowler. Since</p> <p>12 before Christmas I have had an account from the</p> <p>13 Guardian, and I am waiting, although I anticipate I am</p> <p>14 just about to receive, a review conducted by the</p> <p>15 Metropolitan Police with the assistance of the</p> <p>16 Surrey Police. Before distributing to other core</p> <p>17 participants, I want the Metropolitan Police and the</p> <p>18 Guardian each to have the opportunity to review the</p> <p>19 detail in the light of what the other has said, and to</p> <p>20 make submissions in private about the need for</p> <p>21 redactions intended to avoid prejudice to possible</p> <p>22 criminal proceedings. The Guardian certainly anticipate</p> <p>23 that redactions will be necessary to their document, and</p> <p>24 I agree. I then intend to ensure that this evidence is</p> <p>25 brought before the Inquiry and placed in the public</p> <p style="text-align: center;">Page 5</p>	<p>1 MR JAY: Yes.</p> <p>2 Towards the end of the meeting, which was otherwise</p> <p>3 frank and amicable, I indicated to Mr Thurlbeck that</p> <p>4 I was minded to ask him about a specific story he wrote</p> <p>5 in 1998 concerning Mr and Mrs Firth. Mr Thurlbeck</p> <p>6 stated in strong terms that he did not wish to discuss</p> <p>7 that story, pointing out that he had been exonerated by</p> <p>8 the PCC. He became quite agitated about this.</p> <p>9 I countered by stating that the Firth story was of</p> <p>10 interest to the Inquiry because there did not appear to</p> <p>11 be any public interest in its publication. I went on to</p> <p>12 say, although I cannot now recall the precise words</p> <p>13 I used, that in my view, the story was "smut". I might</p> <p>14 well have said that it was "nothing but smut", but</p> <p>15 I cannot be sure of that.</p> <p>16 However, this appellation was reserved for the</p> <p>17 particular story which we were discussing at the time,</p> <p>18 and it was not addressed, nor could it reasonably have</p> <p>19 been interpreted as having been addressed, to the</p> <p>20 News of the World as a whole.</p> <p>21 I adhere to my characterisation of the Firth story</p> <p>22 in these terms, and had Mr Thurlbeck been prepared to</p> <p>23 answer questions about it before you, I would have used</p> <p>24 the term "smut" to make the point. Consideration is now</p> <p>25 being given to whether further evidence should be</p> <p style="text-align: center;">Page 7</p>
<p>1 domain.</p> <p>2 In response to suggestions that I have seen</p> <p>3 advanced, I can make it clear, however, that whatever</p> <p>4 the outcome of this new evidence, I have no intention of</p> <p>5 suggesting, either to the Home Secretary or the</p> <p>6 Secretary of State for Culture, Media and Sport, that as</p> <p>7 a result this Inquiry is no longer justified.</p> <p>8 The fifth topic is a matter which I understand that</p> <p>9 Mr Jay wishes to raise.</p> <p>10 MR JAY: Yes, I wish to deal with the short piece printed in</p> <p>11 the Times last Friday reporting on</p> <p>12 Mr Neville Thurlbeck's blog, to the effect that I told</p> <p>13 Mr Thurlbeck that in my view the News of the World was,</p> <p>14 I quote, "nothing but smut".</p> <p>15 These words were allegedly uttered when I introduced</p> <p>16 myself to Mr Thurlbeck in a meeting room close to this</p> <p>17 Inquiry room. Now, Mr Thurlbeck's recollection is</p> <p>18 incorrect and the belief attributed to me about the</p> <p>19 News of the World in general is not one which I hold.</p> <p>20 The purpose of my meeting with Mr Thurlbeck in the</p> <p>21 presence of the solicitor to the Inquiry and his own</p> <p>22 solicitor was to identify the lines of questioning I was</p> <p>23 minded to pursue with him.</p> <p>24 LORD JUSTICE LEVESON: That's a course you've adopted with</p> <p>25 all the witnesses?</p> <p style="text-align: center;">Page 6</p>	<p>1 adduced before the Inquiry to address the Firth story.</p> <p>2 Finally, I do not recall stating, as the Times</p> <p>3 reports, that I do not know why anyone would read the</p> <p>4 News of the World. Again, this is not a viewpoint which</p> <p>5 I hold. I may well have said, because it is the case,</p> <p>6 that I have not myself read the paper, and I may well</p> <p>7 have also have said, because it is the case, that I read</p> <p>8 the Economist.</p> <p>9 The solicitor to the Inquiry, Ms Kim Brudenell, has</p> <p>10 provided a statement to the Inquiry giving her</p> <p>11 recollection of this meeting. This is broadly to like</p> <p>12 effect and will be made available on the Inquiry</p> <p>13 website.</p> <p>14 LORD JUSTICE LEVESON: Thank you.</p> <p>15 I saw the blog and the article. Although the Firth</p> <p>16 story clearly provided evidence about culture, I did not</p> <p>17 consider it was necessary to trouble Mr and Mrs Firth</p> <p>18 for their account, not least because of the lapse of</p> <p>19 time since the incident.</p> <p>20 Bearing in mind the point that Mr Thurlbeck has</p> <p>21 made, however, I equally understand that it may now be</p> <p>22 of greater importance that I am formally able to form</p> <p>23 a view about the public interest value of the story.</p> <p>24 I made that possibility very clear to Mr Thurlbeck when</p> <p>25 he refused to answer questions about it.</p> <p style="text-align: center;">Page 8</p>

<p>1 Mention of the coverage of this Inquiry and the 2 commentary upon it allows me to raise a further point. 3 At one stage, there was a comment that I had not seen 4 a particular day's report of the hearing. I ought to 5 make it clear that I am receiving a cutting service 6 covering all the press coverage of the Inquiry. I am 7 also aware of coverage by certain periodicals, including 8 Private Eye. I am not concerned about any criticism 9 that might be made either of the Inquiry or of me. That 10 is the critical and all-important virtue of free speech 11 and a free press. Putting comments about the Inquiry to 12 one side, I am presently minded to put all this material 13 into the record as itself providing some evidence of the 14 practices and cultures of the press. The fact that it 15 may relate to the conduct aimed at other titles need not 16 matter, particularly if it is a further example to add 17 to those that I've already seen of attack being 18 considered the best form of defence. If what is 19 reported is said to be untrue, I will, of course, 20 consider it further.</p> <p>21 To date, I recognise the Inquiry has focused on 22 areas which are subject to considerable complaint and 23 criticism. That inevitably is the focus of any Inquiry 24 such as this and is likely to remain. I am equally 25 clear, however, that there is much to applaud in the way</p> <p style="text-align: center;">Page 9</p>	<p>1 A. It is. 2 Q. We've also provided a transcript of the presentation you 3 gave to one of our seminars on 12 October. Now, it was 4 made clear to you -- and the Inquiry stands by that -- 5 that you are not going to be held to anything you said 6 at the seminar. They were informal occasions. But is 7 there anything in relation to what you said at the 8 seminar that you wish to supplement or subtract from? 9 A. No. No. 10 Q. Thank you. So we are clear about your evidence, you 11 were editor of the Sun between 1981 and 1994. Then you 12 moved away from the Sun into commercial broadcasting, 13 and today you own a TV sports channel and you are 14 a columnist on the Daily Mail; is that right? 15 A. Correct. 16 Q. Can I ask you, please, first of all in relation to your 17 statement and the issue of corporate governance, which 18 is paragraph 2 -- you say: 19 "I didn't spend too much time pondering the ethics 20 of how a story was gained, nor over-worry about whether 21 to publish or not. If we believed the story to be true 22 and we felt Sun readers should know the facts, we 23 published it and left it to them to decide if we had 24 done the right thing." 25 So that encapsulates, does it, your thinking at the</p> <p style="text-align: center;">Page 11</p>
<p>1 in which the press go about their business, and it is of 2 critical importance to maintain the context of the 3 entire picture. I have no doubt that some of the 4 balance will be provided in certain aspects of the 5 evidence to which we are now about to turn.</p> <p>6 Right.</p> <p>7 MR JAY: Sir, we have six witnesses today, all of the Sun 8 newspaper or formerly of the Sun newspaper. We're going 9 to deal with them, insofar as we can, chronologically, 10 and the first witness is a former editor, Mr Kelvin 11 McKenzie.</p> <p>12 LORD JUSTICE LEVESON: Thank you.</p> <p>13 MR KELVIN CALDER MCKENZIE (sworn) 14 Questions by MR JAY</p> <p>15 MR JAY: Please sit down, Mr McKenzie and make yourself 16 comfortable. Your full name, please? 17 A. Kelvin Calder McKenzie. 18 Q. Thank you. Mr McKenzie, I hope you have a file which 19 looks like this. In that file, under tab 7, you may 20 well find a witness statement which you provided to us, 21 I think in September of last year. 22 A. Yes. Well, I know I have it, anyway. Carry on. 23 Q. You haven't put a statement of truth on that statement. 24 It doesn't matter. But is this your formal evidence to 25 the Inquiry, Mr McKenzie?</p> <p style="text-align: center;">Page 10</p>	<p>1 time? 2 A. It does. 3 Q. Did you have any particular or any regard to issues such 4 as privacy? 5 A. Not really, no. 6 Q. You said in your seminar -- but I should make it clear 7 this is in the context of a particular story, the Elton 8 John story, which culminated in litigation and in 9 compensation paid to Mr Elton John: 10 "Basically, my view was if it sounded right, it was 11 probably right and therefore we should lob it in." 12 Do you stand by that, Mr McKenzie? 13 A. Yes, I do. I suppose what it comes down to is the verb 14 "to lob". 15 Q. Yes. 16 A. Which I would say, if you analyse it -- I looked it up 17 on the online dictionary and it says "to throw in a slow 18 arc", which I think is probably preferable to another 19 verb, which would be "to chuck it in". So the point I'm 20 making is I wasn't trying to make a humorous point 21 there; I was making a point that we thought about 22 something and then put it in. 23 Q. You, of course, have been observing the printed press 24 since 1994, and presumably the Sun as well. 25 A. Mm-hm.</p> <p style="text-align: center;">Page 12</p>

<p>1 Q. Do you think that that philosophy remains the same or 2 has changed since 1994? Since then, we know there have 3 been four or five editors of the Sun. 4 A. Yes. First -- I'd like to answer the question in two 5 ways. First of all, there is no certainty in journalism 6 in the same way as there's no certainty in the legal 7 world. You have a Court of Appeal, you have huge 8 miscarriages of justice. Not everything is correct, no 9 matter how hard the law tries, and journalism is the 10 same. 11 If you took my rather bullish approach towards 12 journalism, which was by and large the sort of First 13 Amendment approach, the American approach, in which the 14 constitution guarantees free speech -- and I had worked 15 as the managing editor of the New York Post, and I had 16 seen it working. I basically took -- I personally took 17 the view that most things, as far as I could see, should 18 be published. However, I did 13 years as the editor of 19 the Sun. When I left, that attitude certainly changed. 20 The editors were more cautious and were probably in 21 a changing world, more right to be cautious. 22 Q. Would you elaborate on that, please? You've made 23 a number of points but you've said editors were more 24 cautious, and secondly, you've made a judgment about 25 that, that they were right to be cautious. Why do you</p> <p style="text-align: center;">Page 13</p>	<p>1 received something like 40 minutes of nonstop abuse for 2 the issue. It wasn't so much the money, of course; it 3 was the fact of the shadow which it sort of cast over 4 the paper. So the idea that Rupert Murdoch simply took 5 these things on the chin as part of the sort of 6 commercial biff and bat of life is wholly ridiculous. 7 Q. Can you offer some insight about the relationship 8 between yourself and Mr Rupert Murdoch, Mr McKenzie? 9 Was he a hands-on proprietor or did he leave you to get 10 on with it? 11 A. He was -- the Sun was a much more important aspect of 12 his worldwide assets in the 80s than it is today, and 13 therefore his interest in the Sun was much more hands-on 14 and I would speak to him most days. He was interested 15 in the gossip, he had a view about the paper -- not in 16 the sense of saying, "I don't know why you made that the 17 11 lead", or something like that, but he'd have 18 a general view about the feel of the paper, whether it 19 was upbeat enough and those kinds of things. He didn't 20 really get into the detail of the editorial but he had 21 a general sense of whether he liked the paper or not. 22 Q. You say in your statement, under paragraph 9, that 23 Rupert Murdoch "often felt the paper had gone too far 24 under my editorship". What did you mean by that? 25 A. Well, I mean Elton John would be an example. And, you</p> <p style="text-align: center;">Page 15</p>
<p>1 say those two things? 2 A. Well, I think in the end of the day, you are 3 a commercial offering and if the atmosphere towards what 4 you are doing is different from before, then you must 5 change with it. You know, this is what they say -- this 6 is about -- what they say about opinions, you know. 7 When the facts change, you change your opinion. 8 So even towards the end of my time as editing, I was 9 less bullish than I was, for instance, perhaps during 10 the 80s. 11 Q. Was there any fallout from the Elton John story, in 12 particular from the proprietor? 13 A. Well, let's put it this way: he wasn't pleased. 14 I remember sending him a fax, so that's how long ago it 15 was. So you have to get the historical content of my 16 editorship, which was -- after all, I haven't edited now 17 for 20 years and I started 30 years ago. I remember 18 sending him a fax which simply said: "Have sat down with 19 Elton John's people and with the legal people at the Sun 20 and we have agreed to pay £1 million in libel damages in 21 full and final settlement of all issues", the whole 22 point simply saying: "I think we should settle." 23 Anyway, if that went at 1.01 -- he was in New York 24 at the time, Mr Murdoch, so 8 o'clock his time -- the 25 phone then rang at 1.01 and 7 seconds and I then</p> <p style="text-align: center;">Page 14</p>	<p>1 know, part of my character is to be out there being 2 punchy, sort of anti-establishment sort of feel to it 3 all, and I think he sometimes felt that, you know, we 4 may lose too many friends by the general nature of the 5 Sun. 6 Q. Can I ask you, please, about your answer to point 8, 7 which is ethics. You remind us about what the 8 dictionary definition of "ethics" is and then you say: 9 "They were not issues I bothered with." 10 Would you say the same if one substituted for 11 "ethics" the terms "appropriate standards" or "right 12 conduct"? 13 A. It's very difficult in relation to journalism to work 14 out what is the right standard. If you discovered 15 something -- I mean, I -- I mean, this is -- this 16 Inquiry was set up under the guise of phone hacking and 17 therefore if you discovered -- if you had 18 Tony Blair's -- if you had Tony Blair's mobile number 19 and you hacked into it and discovered that he was 20 circumventing the cabinet in order to go to war, as has 21 now emerged in the Iraq Inquiry, and you publish that, 22 if you publish it in the Sun, you get six months' jail. 23 If you publish it in the Guardian, you get a Pulitzer 24 prize. So it's very heart to know, to be truthful, what 25 are standards when you're trying to discover truth.</p> <p style="text-align: center;">Page 16</p>

<p>1 LORD JUSTICE LEVESON: Do you mean that, Mr McKenzie? You 2 think that the attitude to the publication of 3 a significant story would be different depending upon 4 the newspaper in which it was published? 5 A. Well -- 6 LORD JUSTICE LEVESON: Do you really mean that? 7 A. Yes, I do. I sort of three-quarters mean that. What 8 I mean is that there is a tremendous amount of snobbery 9 involved in journalism, as there possibly is in the 10 law -- I've no idea -- and the Sun, during my rather 11 successful period as editor, rather enjoyed that view. 12 But my basic point, sir, is that standards are 13 really defined by the outcome, not by the income, if you 14 see what I mean. So that I would -- I think David Leigh 15 made the same point, the Guardian guy. He would say, 16 "Well, there are stories which I feel phone hacking 17 would be entirely appropriate." 18 SPEAKER: Ask him about Michael Stone! 19 LORD JUSTICE LEVESON: No, no, please, please -- 20 SPEAKER: (overspeaking) 14 years in prison! 21 LORD JUSTICE LEVESON: Please sit down. 22 THE WITNESS: Perhaps we should have an inquiry. How about 23 that? 24 LORD JUSTICE LEVESON: Please sit down. If you can't, then 25 you'd better leave.</p> <p style="text-align: center;">Page 17</p>	<p>1 newspapers which did publish public interest stories 2 which may or may not have involved breaches of the 3 law -- I don't know -- and I'm not sure that the nature 4 of the title would affect your approach to the story. 5 That's what I was really pressing you about. 6 A. Well, I think if you look at it in sort of a dry High 7 Court room, it may look like that, but from the outside, 8 the perception of people is different towards the less 9 successful papers, ie the Guardian and the like, and big 10 red tops. It's just a different atmosphere. Different 11 atmosphere. 12 I mean, let's take the Milly -- you've gone into 13 a good area here. Take the Milly Dowler deletions of 14 those calls. Had that been the Sun, the Sun would have 15 come very, very, very close to being shut down, right? 16 Ie, had they got that story wrong. The Guardian sticks 17 it away on page 10 and hopes they can get away with it. 18 LORD JUSTICE LEVESON: But I don't -- well -- 19 A. Don't you think there is a difference, sir, between the 20 way that the Guardian got that story completely wrong 21 and basically nobody has taken it up, and if the Sun had 22 done the same thing -- if a Rupert Murdoch title had 23 done the same thing, don't you think that might have 24 been different? 25 LORD JUSTICE LEVESON: I think it's quite interesting that</p> <p style="text-align: center;">Page 19</p>
<p>1 SPEAKER: Am I in contempt, my Lord? 2 LORD JUSTICE LEVESON: I'm not going anywhere there. Please 3 sit down or leave. 4 SPEAKER: Ask him about Michael Stone! 5 LORD JUSTICE LEVESON: Sit down or leave. 6 SPEAKER: I've written you a long letter anyway. Am I in 7 contempt? Am I in contempt? 8 LORD JUSTICE LEVESON: Just leave. 9 A. I'm sorry. 10 MR JAY: Sorry. Carry on, Mr McKenzie. 11 A. I've really made my point. The point I'm making is we 12 were dealing with standards, sir, and my only area there 13 was that people view the Sun, I think, at the bottom of 14 the pile, and for as long as it exists, I think they 15 view papers like the Guardian as the top of the pile. 16 LORD JUSTICE LEVESON: I want to just pursue that for just 17 a moment, because David Leigh was making a slightly 18 different point. He was saying that the public interest 19 could justify the publication of a story even if that 20 involved the commission of a criminal offence. 21 A. Mm-hm. 22 LORD JUSTICE LEVESON: He wasn't saying that he could 23 publish it because he wrote in the Guardian, but he 24 couldn't have published it if he wrote in the Sun, and 25 I would have thought that there were examples of</p> <p style="text-align: center;">Page 18</p>	<p>1 you assert that the Guardian got the Milly Dowler story 2 completely wrong. I think that's an interesting 3 assertion. 4 A. Mm. 5 MR JAY: Okay, Mr McKenzie, moving on through your 6 statement, paragraph 11, please. Can I deal with the 7 issue of payment to public officials? 8 A. Mm-hm. 9 Q. Your answer is not altogether clear. Is it your 10 evidence that the Sun did pay money to public officials 11 to whistleblow and that stories were published as 12 a result of that? 13 A. Well, the way the Sun worked is depending on what the 14 amount of money was -- I think I put £3,000 in the 15 thing -- it wouldn't come my way, to be fair. So 16 I don't know how much was going on. But if you are 17 asking me that if somebody is in a state business or 18 actually in any business, where they would reveal 19 a piece of information which we thought might affect Sun 20 readers, then I would write a cheque. 21 Q. Did that include payments to police officers? 22 A. Not as far as I know, but when you get stories from 23 police officers, you get them for many, many reasons -- 24 officers wanting to drop their senior colleagues in the 25 cart, sometimes they feel that stuff is being covered up</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 which they wish to see a larger show. So you don't have 2 to write -- you literally don't have to write cheques to 3 police officers because so many of them want to see some 4 form of justice and they think publicity is often 5 justice. 6 Q. Yes, but putting aside those cases -- and of course, we 7 agree they exist -- were you aware of payments being 8 made to police officers in order to obtain material from 9 them which could form the basis of stories? 10 A. I wasn't. I wasn't, but it wouldn't surprise me if they 11 were. 12 Q. As for the use of private investigators -- this is 13 paragraph 13 -- you say: 14 "We did not use private investigators, although we 15 would have [I think some words may be missing] used 16 people to supply ex-directory numbers when we wanted to 17 speak to somebody." 18 A. Yes. 19 Q. Who were those people? 20 A. Well, I don't know, but it's not an unknown way of doing 21 business, in which you need to contact somebody, so you 22 pay somebody to give you an ex-directory number. 23 I don't know whether that still exists today, and I'm -- 24 you know, if you want to get the other side's version of 25 a story, it's only fair that you contact them. If you</p> <p style="text-align: center;">Page 21</p>	<p>1 A. Basically, if we had readers' complaints, he would try 2 and deal with them ahead of them going to the Press 3 Complaints Commission. 4 Q. About how long did he operate in that capacity? 5 A. I suspect he operated literally probably for about five 6 or six years, and he died. 7 Q. It was probably after your time -- 8 A. It was. 9 Q. -- but do you know why he wasn't replaced? 10 A. I think what happened was there were so few readers' 11 complaints. I know that sounds bizarre if you're 12 selling 3 or 4 million a day, but I think there was, and 13 I think this role was taken over by the managing editor 14 and I think that's probably the right and proper place 15 to do that, to have him do that. 16 Q. Okay. Can I ask you, please, about the evidence we 17 heard from Anne Diamond -- and this relates to a front 18 page story and photograph which we have in your bundle 19 under tab 33. 20 A. Mm-hm. 21 Q. This is the photograph of her, her husband and the 22 coffin of the dead child. Have you read the transcript 23 of her evidence to the Inquiry? 24 A. I have. 25 Q. I'm going to ask you this general question: is there</p> <p style="text-align: center;">Page 23</p>
<p>1 don't know how to get hold of them and there's a way of 2 paying a hundred quid for it, I don't see what the 3 problem is. I'd rather have their denial of the story. 4 The reality is if you don't speak to them, if you 5 haven't tracked them down and, in my words, lobbed the 6 story in, I could face a massive libel action, so £100 7 is a reasonable investment on behalf of the reader, the 8 person who is being named and possibly the commercial 9 effect. 10 Q. Can I ask you, please, some general questions and then 11 some specific questions relating to evidence we've 12 heard. In your view, looking at the Sun now from the 13 outside, has the culture of the Sun changed since you 14 left? 15 A. Definitely. 16 Q. In what respects? 17 A. I think they're much more -- the paper changed under 18 Rebekah Brooks and has continued, I think, to change 19 under Dominic Mohan, in the sense that I think they are 20 much more cautious in their approach. Now, whether 21 that's right is not for me to say, but there's 22 definitely a sense of caution. 23 Q. Can I ask you, please, about the ombudsman who was there 24 for a time in the early 1990s, a Mr Ken Donlan, I think. 25 What, in a nutshell, was his role?</p> <p style="text-align: center;">Page 22</p>	<p>1 anything you wish to tell us which either agrees with or 2 might contradict what she told the Inquiry? 3 A. Well, I'd sort of like to deal with the issue in the 4 reverse order. She chose to say that she had had 5 a conversation with Mr Murdoch at some do or other, in 6 which she had said something like: "How can you sleep at 7 night?" and da di da da, and that that in turn had led 8 to Mr Murdoch indicating in some rather curious way that 9 the Sun and other titles in the News International 10 stable should go after her. 11 Well, I've had the advantage, as distinct from 12 Mr Diamond, of working with Rupert Murdoch for 13 years, 13 and -- closely -- and I've never heard him say, "Go 14 after anybody" under any circumstances, whether it's 15 a Prime Minister, a failing breakfast show host or 16 anybody. He has never said it and why she should 17 believe that her career has suffered because of one 18 conversation is beyond me. 19 We then move on to the second issue -- and I'm 20 taking this in reverse order. The day after -- and 21 I only know this because I called up a colleague, having 22 read the statement from Ms Diamond. The day after that 23 picture emerged, two senior colleagues at the Sun were 24 invited up to Birmingham to see Ms Diamond and her then 25 husband and sat down and worked out the details of the</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 cot death charity which the Sun set up with her as the 2 face. That charity raised £250,000, which I suppose 3 today would be a million quid, which is a lot of money, 4 considering these are Sun readers, and which then 5 beggars the question, going back to the beginning, where 6 the picture appears on the front page of the Sun and 7 I then have a conversation with Ms Diamond -- now, 8 I have no idea 20 years later what the detail of that 9 conversation was. All I'm saying is it couldn't 10 possibly have happened in the way she said it. Why 11 would she have invited us up to Birmingham to then 12 launch a campaign which lasted for five years, which 13 raised a quarter of a million pounds? I have met her on 14 two occasions since then. She's never mentioned the 15 fact that she was forced into doing anything. 16 Q. Just press you on that a little bit more. 17 A. Yes. 18 Q. Her evidence was -- and may I invite you, please, to 19 look at it. It's under tab 32. This is the transcript 20 of the evidence she gave the Inquiry on 28 November. It 21 starts, really, at page 71, looking at the internal 22 numbering in the transcript, line 23. 23 A. Page 71, line -- 24 Q. 23. 25 A. Mm-hm.</p> <p style="text-align: center;">Page 25</p>	<p>1 you know, I don't know why I would be expected to 2 remember that letter. 3 Q. But if you had received such a letter, what would your 4 response, do you think, have been? 5 A. I don't think that's fair, is it? Had I received 6 a letter? I take it I did receive a letter, and 7 I presume that was the reason that when we were sent the 8 picture, which I presume came from a freelance 9 photographer, that I would have rung her and asked for 10 permission to run the photo. 11 Q. The evidence in relation to this is page 73, line 6. 12 A. Right. 13 Q. "In fact, my now ex-husband reminded me this morning 14 when I spoke to him that we were aware there was 15 a photographer at the funeral on the public highway. 16 Within a few hours of the funeral, the editor of the Sun 17 [that's obviously you] rang my husband and said, 'We 18 have a picture and it's an incredibly strong picture. 19 We would like to use it.' 20 Do you remember saying that? 21 A. I don't, no. No. But I don't remember the 22 conversation. I don't know why anybody would expect 23 anybody to remember a conversation 20-odd years ago, 24 but -- I don't remember the conversation, but I'm not 25 saying -- you know, I'm not saying one way or the other</p> <p style="text-align: center;">Page 27</p>
<p>1 Q. This is the photograph itself, Mr McKenzie. You can see 2 under tab -- 3 A. Yes, "Our little love", that one? 4 Q. Yes. 5 A. Mm-hm. 6 Q. If this is the headline, presumably it's the headline 7 you chose, isn't it? 8 A. Mm-hm. 9 Q. The question at line 23: 10 "Perhaps I can stop you there and ask that the 11 second photograph that you kindly provided is displayed. 12 Is that the photograph? 13 "Answer: That's the photograph. If you pull it 14 out, you'll be able to see that they took the entire 15 front page. Now, we had written to every editor begging 16 them to stay away, and this was the front page of the 17 Sun." 18 A. Mm. 19 Q. Do you remember receiving a letter from her, 20 Mr McKenzie, begging you to stay away? 21 A. I don't, no. But why would I remember that? It's 22 20-odd years ago. I mean, I don't know -- 23 unfortunately, the Sun editor's office is not like the 24 Leveson Inquiry. It's a massive, you know, hourly upon 25 hourly sprawl of phone calls and general rioting, so,</p> <p style="text-align: center;">Page 26</p>	<p>1 about that. 2 Q. But is it the sort of thing that that you might have 3 said? In other words -- 4 A. No, I'm not answering "is that the kind of" questions. 5 I'm just not answering that kind of question. That's 6 not a reasonable -- that is not a reasonable question. 7 Q. I won't press it then -- 8 LORD JUSTICE LEVESON: We can put the question this way: was 9 your attitude at that time that if you had a photograph 10 which you felt extremely strongly would sell newspapers, 11 that you would publish it? 12 A. But you don't -- can I say, sir, you don't think like 13 that when you're an editor. You don't say "would sell 14 newspapers". What you think is it would improve your 15 newspaper, yes, or that the readers might like it, yes, 16 but the selling -- the idea of the day-to-day thought 17 process of selling more newspapers does not happen in 18 that manner. 19 LORD JUSTICE LEVESON: I could articulate the same question 20 changing the verb then. 21 A. Mm-hm. Well, I -- well, in changing the verb, did 22 I think that the paper would be better with that picture 23 in than not? Yes. The answer is yes. 24 MR JAY: Looking at the picture now -- and it's under 25 tab 33 -- do you think that it is or was an incredibly</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 strong picture?</p> <p>2 A. Yes, I do, and I think -- I think -- remember, 20-odd</p> <p>3 years ago, cot deaths were -- most of the people</p> <p>4 connected with cot deaths were considering by a sort of</p> <p>5 mass opinion to be murderers. Today they know that none</p> <p>6 of this is true. So I'd say that that picture and the</p> <p>7 five, seven-year campaign against cot deaths created the</p> <p>8 climate in which a lot of people have had guilt removed</p> <p>9 from the top of their head.</p> <p>10 Q. But you're then using the ends to justify the means --</p> <p>11 A. No, you just asked me a question. I'm just explaining</p> <p>12 the circumstances.</p> <p>13 Q. Fair enough, but can we just carry on with the evidence</p> <p>14 that Anne Diamond gave the Inquiry? At line 12 on</p> <p>15 page 73, she carries on:</p> <p>16 "My husband said, 'No. We've asked all of you to</p> <p>17 stay away. No.'"</p> <p>18 This is in answer to your point:</p> <p>19 "We would like to use it."</p> <p>20 And you then said:</p> <p>21 "We're going to use it anyway. We'll use it with or</p> <p>22 without your permission."</p> <p>23 Might you have said that?</p> <p>24 A. I've no idea. I've no idea. They seem to remember</p> <p>25 conversations 20 years ago. I don't, and I think I'm</p> <p style="text-align: center;">Page 29</p>	<p>1 detail. It's astonishing that some people can, but</p> <p>2 I can't remember the detail.</p> <p>3 LORD JUSTICE LEVESON: Hang on, Mr McKenzie. Do you really</p> <p>4 think it's surprising that somebody who has just buried</p> <p>5 their child, who's obviously gone to some trouble about</p> <p>6 wanting to keep it private, might remember conversations</p> <p>7 that impact on that?</p> <p>8 A. Well, sir, they didn't get the other two aspects to</p> <p>9 which I do know right, so -- one of them are actual</p> <p>10 details of 13 years of knowledge, so why on earth should</p> <p>11 everybody accept what she says and not accept my version</p> <p>12 of events?</p> <p>13 MR JAY: Mr McKenzie, the overwhelming factor is surely</p> <p>14 this: you had an strong picture in your hand. You knew</p> <p>15 that that picture, if published, would have an impact on</p> <p>16 your readers; is that correct?</p> <p>17 A. Yes.</p> <p>18 Q. Whether or not that picture would increase circulation</p> <p>19 of the Sun, which we can see may be debatable, the</p> <p>20 overwhelming impetus here was surely to publish the</p> <p>21 photograph which you had over the wishes of those who</p> <p>22 were in the photograph. Would you not agree?</p> <p>23 A. Well, no, I don't, because if that were the case, then</p> <p>24 the following day she would presumably never have sat</p> <p>25 down with Sun executives who were responsible for the</p> <p style="text-align: center;">Page 31</p>
<p>1 the more reasonable one in this circumstance.</p> <p>2 Q. But you told me about seven or eight minutes ago that</p> <p>3 Anne Diamond's evidence was wrong.</p> <p>4 A. I'm talking about the two bits that I know about, which</p> <p>5 is, one, 13 years of working with Rupert Murdoch, he</p> <p>6 never said "go get" anybody. The second one, the</p> <p>7 following day they were so upset that they sat down with</p> <p>8 Sun executives and took part in a charity campaign which</p> <p>9 raised 250,000 and lasted for five to seven years,</p> <p>10 right -- so why would this conversation be any truer</p> <p>11 than the previous two points? That is my point. I say</p> <p>12 she's a devalued witness.</p> <p>13 Q. You're now, as it were, commenting on the evidence</p> <p>14 someone else gave, rather than giving your --</p> <p>15 A. Well, what can I say? I've said I can't remember and</p> <p>16 I've explained the two bits that I do know about and I</p> <p>17 don't remember this. I don't know what's wrong with</p> <p>18 that.</p> <p>19 Q. You might, for example, in answer to my question, have</p> <p>20 said, "I certainly would never have said that because</p> <p>21 had I been told that consent was not given for the use</p> <p>22 of the paper, I would not have published the</p> <p>23 photograph."</p> <p>24 A. I take that QED from the earlier two that I would never</p> <p>25 have said the third bit, so -- but I can't remember the</p> <p style="text-align: center;">Page 30</p>	<p>1 decision and worked out how to start a charity and raise</p> <p>2 money. I mean, it just doesn't make sense, does it?</p> <p>3 Q. The evidence in relation to that is further down</p> <p>4 page 73. It was a few days later, the deputy editor of</p> <p>5 the Sun -- who I think was Mr Neil Wallis at the time;</p> <p>6 is that right?</p> <p>7 A. Well, he wasn't the deputy editor. I think he was the</p> <p>8 features editor.</p> <p>9 Q. All right. Well, according to her statement, I think it</p> <p>10 was --</p> <p>11 A. No, it was the features editor.</p> <p>12 Q. The precise identity doesn't necessarily matter. The</p> <p>13 gist of it was that he wanted to meet with her to</p> <p>14 discuss how the Sun could help her raise more funds into</p> <p>15 cot death research and her position was -- and</p> <p>16 I paraphrase -- that she was, in effect, being</p> <p>17 emotionally blackmailed here, that if she refused the</p> <p>18 request, then a worthwhile charity would be denied, if</p> <p>19 she acceded to it, it would appear as if she had in some</p> <p>20 way agreed to the publication of the photograph, but</p> <p>21 after a lot of agonising about it, she agreed to</p> <p>22 participate in the charity.</p> <p>23 Doesn't all that ring true?</p> <p>24 A. No. No. You would have thought -- if she had felt as</p> <p>25 strongly as she appeared to have felt at Leveson, you</p> <p style="text-align: center;">Page 32</p>

<p>1 would have thought 20 years earlier she would still be 2 massively hostile to us, and she wasn't.</p> <p>3 Q. Can I ask you, please, about a separate matter: your 4 dealings with politicians.</p> <p>5 A. Mm-hm.</p> <p>6 Q. Did you, whilst editor of the Sun between 1981 and 1994, 7 have private meetings with politicians?</p> <p>8 A. Yes, I did. Yes, I did, mm-hm.</p> <p>9 Q. About how often was that?</p> <p>10 A. It varied. I suppose I'd see -- I'd probably see 11 Mrs Thatcher, I don't know, twice a year. Might see 12 individual cabinet ministers, you know, perhaps six or 13 eight times, ten times in a year.</p> <p>14 Q. In a nutshell, what was the purpose of those meetings?</p> <p>15 A. If you know politicians, the purpose of it was to -- for 16 them to explain their views and what geniuses they were 17 to you. That was basically the point. And it was 18 interesting to me to meet intelligent people, powerful 19 people.</p> <p>20 Q. It went a bit further than that, didn't it, Mr McKenzie? 21 We all know that in the 1980s, and indeed in the early 22 1990s, the Sun was a strong supporter of the then 23 Conservative government; is that correct?</p> <p>24 A. Yes, absolutely.</p> <p>25 Q. And the motive may well have included this: a desire to</p> <p style="text-align: center;">Page 33</p>	<p>1 off the front page. That night a furious Brown called 2 Murdoch and, in Rupert's words, 'roared at me for 20 3 minutes'."</p> <p>4 Can I ask you what the source of that statement is? 5 Is it Mr Rupert Murdoch who told you?</p> <p>6 A. It was Mr Murdoch, yes.</p> <p>7 Q. Then your seminar contribution continues: 8 "At the end, Brown said, 'You're trying to destroy 9 me and my party. I will destroy you and your company.'" 10 Is that what he said?</p> <p>11 A. Yes, he did.</p> <p>12 Q. According to what Mr Rupert Murdoch told you?</p> <p>13 A. That's what Mr Murdoch told me, yes.</p> <p>14 Q. Can I ask you finally, please, Mr McKenzie -- it's 15 a general question -- for any assistance you could give 16 this Inquiry as to either the constitution of any future 17 regulatory body or the powers it might have.</p> <p>18 A. Right. Well, I have one, I think, important change that 19 I would make in the running of the Press Complaints 20 Commission. 21 In the end, newspapers are commercial animals. They 22 try and make money, although papers like the Guardian 23 and the Times fail lamentably in that area, but they try 24 to make money. I would be in favour of fines and heavy 25 fines for newspapers that don't disclose the truth to</p> <p style="text-align: center;">Page 35</p>
<p>1 continue to hold the support of the Sun. Would you 2 agree?</p> <p>3 A. Yes. I was always astonished that a prime minister 4 would want to meet a tabloid journalist with one GCSE. 5 I was -- I wondered where the equivalence was in that 6 discussion.</p> <p>7 Q. I think you diminish your importance, Mr McKenzie. You 8 were in a position of immense power. You had 4 million 9 plus purchasers of the paper, many more people reading 10 it. You held influence over public opinion, and 11 unsurprisingly, politicians wanted to retain that 12 influence. Isn't it as simple as that?</p> <p>13 A. Yes, I don't doubt that. I don't doubt that.</p> <p>14 Q. You give us one anecdote -- and I ask you to confirm 15 this -- in what you told the seminar. It's on the last 16 page of tab 8.</p> <p>17 A. Mm-hm.</p> <p>18 Q. "When the Sun decided to endorse the present 19 Prime Minister for the next general election ..." 20 Which would have been, I think, in the summer 21 of September 2009, because you --</p> <p>22 A. I think it was -- yes, it would either have been 23 the September or October of 2009, yes.</p> <p>24 Q. And then you say: 25 "Of course, the endorsement blew away Brown's speech</p> <p style="text-align: center;">Page 34</p>	<p>1 the Press Complaints Commission.</p> <p>2 One of the issues that happened with the PCC in 3 relation to phone hacking -- and I think if you get the 4 former PCC director here, she'll tell you -- Baroness 5 somebody-or-other, I don't know her -- that they were 6 lied to by News International. And that was quite 7 wrong, and they should pay a commercial penalty for 8 doing that, and I think you'd discover that a financial 9 constraint -- not that I ever expect anything like this 10 ever to happen again anyway, under any circumstances, 11 but I think the threat of financial penalty will have 12 a very -- will have a straightforward effect on 13 newspapers. No editor, no managing director, no 14 proprietor, would dream of lying under those 15 circumstances.</p> <p>16 Q. I've been asked to put to you another question. 17 A. Okay.</p> <p>18 Q. I'll put it to you in two phases, if I may. First of 19 all, were your relations with or respect for Mr John 20 Major as good as they were with Baroness Thatcher?</p> <p>21 A. No, they were -- no, we didn't have a -- no, we did not 22 have a particularly good relationship. He was no 23 Thatcher, John Major.</p> <p>24 Q. Okay, and then specifically I'm asked to put to you this 25 question: after the ERM debacle, which I think was</p> <p style="text-align: center;">Page 36</p>

<p>1 in September 1992, did you tell Mr Major that you would 2 throw a bucket of something unpleasant over him? 3 A. That makes it sound as though I was being discourteous 4 to the Prime Minister and it wasn't quite like that. 5 What happened was he called up on the night of the ERM, 6 which, for members of -- not familiar with political 7 history, we'd seen interest rates rise all day in 8 an attempt to beat off people who were investing against 9 us staying in the ERM, and it reached literally 10 15 per cent or something ridiculous. 11 Q. It did, yes. 12 A. And he called me up -- I mean, why you would call up the 13 editor of the Sun when you were involved in this 14 terrible economic catacomb, I have no idea -- and said 15 to me: "I'm just calling you up, Kelvin, to find out how 16 the story is going to play in the paper tomorrow", and 17 on that basis I simply said, "Actually, I have a bucket 18 of shit on my desk, Prime Minister, and I'm going to 19 pour it all over you." 20 Now, the only reason anybody knows anything about 21 that is because Trevor Kavanagh, our political editor 22 was sitting there, and he was -- otherwise nobody would 23 have known about it. 24 MR JAY: Okay. I think you've confirmed what I've suggested 25 to you. Thank you very much. There may be some more</p> <p style="text-align: center;">Page 37</p>	<p>1 house of the Supreme Court, who may reverse it, and 2 that's entire appropriate, but the facts you surrounded 3 that comment about related to the suggestion that simply 4 by turning your back on an explosion, you'd avoid 5 radiation. Did you do any work at all on the facts? 6 Because if you had, you'd have known the case wasn't 7 about that at all; it was about low dose radiation 8 concerned with eating fish that had been in the water or 9 swimming in the sea. So a fact that's just wrong is 10 what concerns me, which was easily ascertainable. 11 A. Well, actually -- I mean, I was connected with -- my 12 email box is full of families connected with this 13 Inquiry -- this particular case, many of whom, as you 14 well know, sir, are dying while waiting for judgment in 15 this matter, and actually I got it mainly from one of 16 those, actually. 17 LORD JUSTICE LEVESON: But did you think about looking at 18 the decision? 19 A. No, I didn't. 20 LORD JUSTICE LEVESON: Either of the High Court or the Court 21 of Appeal? 22 A. No, I didn't, no. 23 LORD JUSTICE LEVESON: The basis upon which the case was 24 brought in the end? 25 A. I can either -- look, you are the judge in the case.</p> <p style="text-align: center;">Page 39</p>
<p>1 questions. 2 LORD JUSTICE LEVESON: You said at the beginning of your 3 evidence there's no certainty in journalism -- 4 I understand that -- and you've compared it with the 5 law. You said no matter how hard you try, you make 6 mistakes. But in relation to facts, not opinion, which 7 is legitimate and entirely appropriate, to what extent 8 do you believe that it's appropriate that journalists do 9 ensure that they're getting the facts right? 10 A. But, sir -- 11 LORD JUSTICE LEVESON: To such extent as they can? 12 A. Yes, I agree. But we're both -- I know this sounds 13 bizarre, but both the law and journalism are in the 14 uncertainty business. We don't know what the truth is. 15 If you have a car crash -- two people giving their 16 verdicts on the car crash -- it's incredible. 17 LORD JUSTICE LEVESON: Let me give you an example, and the 18 example I take because it is something which I happen to 19 know something about. It's not because I am at all 20 concerned about what you said about me -- you're 21 entitled to your view about me, whatever it is -- but 22 one of the comments you made at the seminar concerned 23 the nuclear veterans case. 24 A. Oh, yes. 25 LORD JUSTICE LEVESON: Actually, that's presently before the</p> <p style="text-align: center;">Page 38</p>	<p>1 You obviously know about it much better than I do. I'm 2 talking about people who email me and who are involved 3 in the thing, and they sometimes -- people get things 4 wrong. There is no absolute truth in any newspaper, nor 5 there is an absolute truth in any court. 6 LORD JUSTICE LEVESON: No, I agree with that. 7 A. This is the area that I'm dealing with. 8 LORD JUSTICE LEVESON: The question is the extent to which 9 it's appropriate to research facts before putting them 10 in the public domain. 11 A. Okay, I accept that. I do accept that. This is another 12 issue, though. There are time constraints, where 13 sometimes you literally get things wrong, either because 14 in this case -- I'd be quite interested to see what my 15 email box looks like, having had this conversation, by 16 the way, because I suspect there will be lawyers and 17 various other interested parties who basically will say 18 to me that you were right in this case. I've no idea. 19 That's normally what happens in these kinds of battles. 20 I recognise entirely -- I am saying that I accept what 21 you say may be correct, but I can also tell you that by 22 the time -- let's say about 10 o'clock tonight, I would 23 have probably received 150 emails from various people 24 connected with that Christmas Island Veterans 25 Association saying something completely different. I'm</p> <p style="text-align: center;">Page 40</p>

<p>1 just saying it's so hard, in life, in the law and in the 2 press, to get things 100 per cent correct. 3 LORD JUSTICE LEVESON: Yes. Well, I'm merely quoting from 4 the judgments in the Court of Appeal as to how the case 5 was put. I understand that many people have different 6 concerns but I'm talking about how the case was put. 7 A. Okay, sir. 8 LORD JUSTICE LEVESON: I only mention it because it's as 9 ascertainable fact. I readily recognise that time 10 constraints may very well mean that the same accuracy 11 cannot be obtained if you have to make a decision very 12 quickly, and mistakes can be made, but would you agree 13 with the proposition that where it is possible, where it 14 is ascertainable, facts should be accurate? 15 A. Oh yes. And you will never find -- you know, 20 million 16 journalists. Nobody is ever going to say that anything 17 is going to be done, but -- in politics, you can take 18 a fact, in economics you can take a fact, even in 19 journalism you can take a fact and make it look like 20 something else. Statistics would be a prime example. 21 It is very, very hard, very, very hard to be 22 100 per cent accurate. 23 LORD JUSTICE LEVESON: The reason that I mention this is 24 because it goes back to the very first comment you were 25 asked about, namely: "Well, if it looks right, we'll --"</p> <p style="text-align: center;">Page 41</p>	<p>1 particularly being a print journalist today. 2 LORD JUSTICE LEVESON: Getting facts right, of course, is 3 a difficult exercise for the very reason you've 4 identified, and I entirely endorse the view that 5 retrospectively looking at events and trying to find out 6 where the truth lies is sometimes extremely difficult. 7 A. Mm. 8 LORD JUSTICE LEVESON: But that's not an excuse for not 9 having a go. 10 A. No, I agree. I agree, and I may have misphrased that 11 slightly, but not a lot, to be honest. Not a lot. 12 LORD JUSTICE LEVESON: My only concern is to ensure that the 13 tenets of the code, which everybody seems to consider 14 broadly fit the bill, which include accuracy, are 15 followed, and that people have regard to what ultimately 16 they're putting in the papers which go to so many 17 people. 18 A. And I agree with that. 19 LORD JUSTICE LEVESON: I'm very pleased that we can end on 20 that note. Mr Sherborne? 21 MR SHERBORNE: It's not a question. I briefly wanted to 22 remind the Inquiry what Ms Diamond's evidence was, given 23 that it's been mischaracterised by Mr McKenzie on 24 a number of occasions. You'll find it in her witness 25 statement. It relates to not that she was told by</p> <p style="text-align: center;">Page 43</p>
<p>1 A. Yes, lob it in. 2 LORD JUSTICE LEVESON: "-- lob it in." 3 A. Yes, well -- 4 LORD JUSTICE LEVESON: I just wonder whether it merely 5 looking right is a sufficient test of accuracy. 6 A. Okay, supposing I overegged the pudding there, but I 7 said if it looks like and it feels right, but the 8 analysis of it -- it was the Elton John case that saw me 9 out the door on what is the truth. And you know 10 yourself, miscarriages of justice, where you have the 11 cleverest people in the land analysing facts, the finest 12 police officers, the greatest witnesses, and it turns 13 out to be completely wrong. The Gilfoyle case, the guy 14 who did 17 years for a murder he didn't commit. The 15 idea that this could all come down to a Sun editor or 16 a Sun royal reporter getting something slightly wrong or 17 even getting something majorly wrong and it being 18 a terrible, terrible indictment of the press is simply 19 wrong. It's simply wrong. Journalists try to get 20 things right. People tell you lies. Sometimes they 21 think it's the truth and then you drill down into it, 22 and you think it's the truth and then you get a phone 23 call the following day and somebody says, "That's 24 completely wrong. They weren't there." 25 It is a massively difficult problem being a --</p> <p style="text-align: center;">Page 42</p>	<p>1 Mr Murdoch that he had it in for her, but what she 2 understood as a result from watching, as many others 3 did, the Channel 4 documentary that is referred to in 4 her witness statement at paragraphs 4 and following, 5 where she said it was Mr Townsend, Mr Murdoch's former 6 butler, somebody who presumably knew Mr Murdoch a little 7 more intimately that are Mr McKenzie, perhaps, who had 8 said on the programme that after that evening when she'd 9 asked the fateful question of Mr Murdoch: "Do you know 10 what it feels like to ruin other people's lives?" he had 11 then -- and I pick this up at paragraph 8 -- recalled 12 that: 13 "Do you know this woman Diamond? She was very rude 14 to me the other night about me destroying people's 15 lives." 16 "The way it is described in the documentary by 17 Mr Townsend is that Mr Murdoch's call to his editors 18 left them in now doubt that they were to go after me." 19 Then she explains why that belief seemed to be borne 20 out in reality by the experience she suffered almost 21 immediately and then following that for a number of 22 years at the hands of the Sun. 23 I remind you of that because that's of course an 24 ascertainable fact on the Inquiry's website, but of 25 course, if Mr McKenzie's story sounds right, et cetera,</p> <p style="text-align: center;">Page 44</p>

<p>1 et cetera.</p> <p>2 LORD JUSTICE LEVESON: All right, thank you.</p> <p>3 A. Could I just take up the point by Mr Sherborne there?</p> <p>4 LORD JUSTICE LEVESON: You may.</p> <p>5 A. The butler would not know Mr Murdoch better than I have.</p> <p>6 I have worked for Rupert Murdoch pretty closely now for</p> <p>7 30-odd years. He's been an investor in my company.</p> <p>8 I have worked for him, I have taken phone calls from him</p> <p>9 every single day. I think he went to jail in the end,</p> <p>10 that butler, Mr Sherborne? Didn't that butler go to</p> <p>11 jail for fraud?</p> <p>12 MR SHERBORNE: I don't answer questions.</p> <p>13 A. Do you not? Can I just raise it to the court?</p> <p>14 Mr Sherborne may not know, but I suspect that the butler</p> <p>15 went to jail.</p> <p>16 Anyway, the point I'm making is if you took the</p> <p>17 butler's evidence against mine, on the basis of whether</p> <p>18 I knew him better than the butler, the answer is:</p> <p>19 I would know him hands down.</p> <p>20 LORD JUSTICE LEVESON: I'm not going to resolve the issue</p> <p>21 between the butler and you, Mr McKenzie. Thank you.</p> <p>22 MR JAY: Thank you, Mr McKenzie.</p> <p>23 The next witness is Mr Gordon Smart. I'm working on</p> <p>24 the basis that we cover at least three witnesses in the</p> <p>25 morning because Mr Mohan may take a bit longer.</p> <p style="text-align: center;">Page 45</p>	<p>1 without that benefit. But can you tell us, please, who</p> <p>2 you are in relation to the Sun newspaper?</p> <p>3 A. I'm the showbiz editor of the Sun newspaper.</p> <p>4 Q. And you have been for how long?</p> <p>5 A. For four years.</p> <p>6 Q. How does that differ, if at all, from the Bizarre</p> <p>7 column? Could you clarify that?</p> <p>8 A. I was promoted in 2009. I think it was more of a pay</p> <p>9 rise issue, really. Originally I was promoted to be the</p> <p>10 editor of the Bizarre column. I was given more</p> <p>11 responsibility in 2009.</p> <p>12 Q. Do you still, in effect, edit the Bizarre column?</p> <p>13 A. That's correct, yes.</p> <p>14 Q. We can see how the Bizarre column works, that there is</p> <p>15 a photograph of yourself in a banner with "Bizarre" on</p> <p>16 it. Do I have that right?</p> <p>17 A. That's correct, yes.</p> <p>18 Q. Can I ask you -- and this is now paragraph 4 of your</p> <p>19 statement -- to deal with how you address ethical</p> <p>20 issues. Could you tell us about that in your own words?</p> <p>21 A. We have a daily discussion. I list stories in</p> <p>22 conference to the editor. After my staff have presented</p> <p>23 me with their stories for the day -- I have four staff</p> <p>24 on the newspaper and two online -- I make a decision</p> <p>25 about which stories I should list after questioning them</p> <p style="text-align: center;">Page 47</p>
<p>1 MR GORDON MURRAY SMART (sworn)</p> <p>2 Questions by MR JAY</p> <p>3 MR JAY: Sit down, please, and make yourself comfortable and</p> <p>4 give us your full name.</p> <p>5 A. Mr Gordon Murray Smart.</p> <p>6 Q. Mr Smart, I see that you don't have any bundles in front</p> <p>7 of you.</p> <p>8 A. Ah, the one that -- no.</p> <p>9 Q. We're going to make some bundles available to you,</p> <p>10 I hope, so that you can see your witness statement. If</p> <p>11 those are the right bundles, please look at file 2</p> <p>12 underneath tab 3. You'll see first of all a witness</p> <p>13 statement dated 14 October of last year, to which you</p> <p>14 put a statement of truth. Is that correct?</p> <p>15 A. That's correct, yes.</p> <p>16 Q. Is that formally your main evidence, Mr Smart?</p> <p>17 A. Yes, it is.</p> <p>18 Q. On Friday afternoon, you provided a second witness</p> <p>19 statement together with one exhibit, which deals with</p> <p>20 the evidence of Mr Chris Atkins. Is that also correct?</p> <p>21 A. That's correct, yes.</p> <p>22 Q. I think that statement is in your right hand?</p> <p>23 A. I have that here, yes.</p> <p>24 Q. We haven't, in fact, Mr Smart, had the opportunity of</p> <p>25 a chat to discuss your evidence, so we will proceed</p> <p style="text-align: center;">Page 46</p>	<p>1 about the sourcing, and then from there, possibly</p> <p>2 a discussion with other staff on the paper before making</p> <p>3 a decision about what I list at the top of my daily news</p> <p>4 list before I go into conference.</p> <p>5 Q. In terms of assessing ethical dilemmas as and when they</p> <p>6 arise, are those matters then discussed at the</p> <p>7 conference you're referring to?</p> <p>8 A. They are, yeah. They're discussed before that.</p> <p>9 I discuss it with my colleagues on Bizarre. If I'm in</p> <p>10 any doubt, I'll discuss it further with more senior</p> <p>11 colleagues, and I'm not afraid to take advice, because</p> <p>12 there are people in the office with a lot more</p> <p>13 experience than I have.</p> <p>14 Q. We'll cover that in a moment. Do you ever take advice</p> <p>15 from the PCC directly?</p> <p>16 A. We do, yes. We often sit in the managing editor's</p> <p>17 office and we'll call the PCC direct. If there's a</p> <p>18 story I list that raises any alarm bells that I haven't</p> <p>19 spotted, the managing editor will often mention it to me</p> <p>20 after the conference and we will have a discussion</p> <p>21 direct with the PCC, yes.</p> <p>22 Q. You say in paragraph 7 that it's important to maintain</p> <p>23 good relations with celebrities. Are we to understand</p> <p>24 by that that that usually entails giving them prior</p> <p>25 notice of any story you are minded to publish?</p> <p style="text-align: center;">Page 48</p>

<p>1 A. That's correct, yes, but the bigger picture as well. 2 Something I've really tried to do in my time at the 3 paper is to improve relations with celebrities. I think 4 it's really important that we have a mutual trust. You 5 have to remember that I have to spend a lot of time in 6 their company, and it's not particularly easy if you've 7 crossed swords and there's a bad relationship there. So 8 I take it very seriously indeed and it's something 9 I encourage in my staff as well.</p> <p>10 Q. You talk quite generally about the need to maintain 11 mutual trust, but how specifically do you work towards 12 achieving that end, Mr Smart?</p> <p>13 A. Well, we discuss all stories with the PCC and we're 14 respectful to people's individual right to privacy. It 15 is a balancing act. You have to weigh it up on a daily 16 basis and I'd like to think that most of the time we get 17 it right. Very occasionally we will get it wrong.</p> <p>18 Q. We're going to come to specific examples of balancing 19 later on in your statement, I know, but in paragraph 8 20 you deal with recent changes to procedures on cash 21 payments. There's a new payments policy, and we've seen 22 evidence of that in one of the bundles. Four signatures 23 are now required before the money is paid. What, in 24 a nutshell, was the position before that policy was 25 introduced, Mr are smart?</p> <p style="text-align: center;">Page 49</p>	<p>1 Q. Can I just understand how this works practically? If 2 you don't know the identity of the source, how are you 3 able to probe to satisfy yourself that the source is 4 reliable?</p> <p>5 A. I'll always ask where the story's come from, if they're 6 a regular contact, if it's from a PR, if it's from the 7 celebrity direct, if it's somebody they haven't dealt 8 with before, if it's a ring in, which occasionally 9 happens -- people phone up with tips. I'll be very 10 specific and rigorous about where that contact has come 11 from and how they have the information.</p> <p>12 Q. So always asking about where the information has come 13 from, has that been your consistent practice while 14 working on the Sun newspaper?</p> <p>15 A. That's correct, yes. Since day one, it's always been 16 drummed into me, yeah.</p> <p>17 Q. Looking at the practice of others working on the Sun 18 newspaper, whether it's people of equivalent status 19 above or below you, has that also been their practice, 20 in your view, since you've been working on the Sun 21 newspaper?</p> <p>22 A. I believe so, yes, and I'm hugely proud of my colleagues 23 at the paper. I think they operate very responsibly and 24 ethically, yeah. Good professional people.</p> <p>25 Q. Right. Then in paragraph 9 you deal with the issue of Page 51</p>
<p>1 A. In the past, if I had to pay cash I would normally get 2 the news editor's signature and the managing editor's 3 signature or possibly the editor's signature before 4 I could pay cash.</p> <p>5 Q. Was that up to any particular amount or was it without 6 limit?</p> <p>7 A. All cash payments, really. Every cash payment.</p> <p>8 Q. What, under the old regime, which I know has been 9 superseded -- what information, if any, would the 10 editors you spoke to ask for before the payment was 11 authorised?</p> <p>12 A. I'd be asked about the contact and the sources of the 13 story and I'd always reassure my line manager or the 14 news editor about who it was.</p> <p>15 Q. Okay. Checking sources of information, Mr Smart, this 16 is paragraph 9. You take full responsibility, you 17 rightly say, but you regularly discuss with your staff 18 the context of their sourcing. You make it clear that 19 that does not entail knowing the identity of the source. 20 Have I correctly understand understood that?</p> <p>21 A. We have a moral obligation to protect the sources if 22 they want to remain anonymous but I will always question 23 them about their sources. Ultimately, it's my face at 24 the top of the column so I do take is very seriously 25 indeed, yes.</p> <p style="text-align: center;">Page 50</p>	<p>1 corroboration, and this is picked up again in 2 paragraph 10. I mean, how often is it that you might 3 publish a story without it being corroborated?</p> <p>4 A. Very rarely, I have be honest. We have to check stories 5 as thoroughly as possible and the best way to do that is 6 to corroborate with different contacts. The beauty of 7 the Sun is that I have colleagues who have better 8 contacts in certain areas who I can rely on to help me 9 stand stories up.</p> <p>10 Q. You deal with the sort of contacts you're referring to, 11 whether it's people who are around the celebrity in 12 their circle, as it were, whether it's their agents or 13 whether it's someone within the newspaper who also knows 14 them. Have I correctly characterised the different sort 15 of possibilities?</p> <p>16 A. Sounds correct, yes.</p> <p>17 Q. Okay. You give some particular examples about checking 18 of sources in paragraph 12. The first one is getting 19 some photographs of a female pop star. You satisfied 20 yourself then that the photographs were being offered to 21 you in breach of copyright. Have I correctly summarised 22 that piece of evidence?</p> <p>23 A. That's correct, yes.</p> <p>24 Q. Then, in (ii), a tip that a celebrity was pregnant. 25 This is an issue which may often arise, whether it's Page 52</p>

<p>1 before or after the 12-week scan. What, in a nutshell, 2 is your policy in relation to that?</p> <p>3 A. The PCC states very clearly that you can't write about 4 it before the 12-week mark and it's something that we 5 respect and take very seriously indeed, as I'm sure the 6 editor will fill you in on later as well.</p> <p>7 Q. Thank you. Then another example in paragraph (iii). 8 This is involving an alleged assault by a footballer on 9 his ex-girlfriend. Once that evidence was corroborated, 10 as it were, from the French police, you went ahead and 11 published the story; is that right?</p> <p>12 A. That's correct, yes.</p> <p>13 Q. Paragraph 13 we have dealt with already, but can I deal 14 with paragraph 14, where you deal with the concept of 15 ethics. What do you understand by the term "ethics" in 16 the context of newspapers, in particular your column?</p> <p>17 A. Well, it's about the balancing act, I think, really, 18 between the public interest and the individual's right 19 to privacy. There often is a grey area there, but 20 I think it's something we -- we walk that line every day 21 and I do think we get it right more often than we get it 22 wrong. You know, there is a PCC argument for public 23 interest and free speech, but we also take it very 24 seriously that people have a right to privacy.</p> <p>25 Q. Can I ask you to clarify one sentence in paragraph 14.</p> <p style="text-align: center;">Page 53</p>	<p>1 us that privately they weren't behaving in the way they 2 had reported in the press, then I feel that would be an 3 opportunity --</p> <p>4 LORD JUSTICE LEVESON: But do they have to do that? They 5 have to have done something --</p> <p>6 A. Yeah.</p> <p>7 LORD JUSTICE LEVESON: -- other than simply being 8 a celebrity?</p> <p>9 A. I believe so, yes.</p> <p>10 LORD JUSTICE LEVESON: So it's not good enough that 11 a celebrity might be behaving in a way which the public 12 may not approve of, if they're not in any way setting 13 themselves up?</p> <p>14 A. That would be the basis for it. If they were setting 15 themselves up, yeah.</p> <p>16 LORD JUSTICE LEVESON: But short of that, it's --</p> <p>17 A. We write a lot of trivial stories. That's the thing. 18 A lot of material will appear in the paper that you 19 might argue isn't in the public interest, but there is 20 a grey area there. And generally if it's not damaging, 21 then I would see it as fair game to report it.</p> <p>22 MR JAY: I think there are two possible themes which come 23 out of that last answer. You see the difference, maybe, 24 between someone being a role model because they have 25 expressly articulated -- they have stated a position on</p> <p style="text-align: center;">Page 55</p>
<p>1 It's the fifth line. You say that you believe there's 2 a clear public interest in exposing truth and setting 3 the record straight. Logically, that might suggest that 4 the one thing which matters is whether or not a story is 5 true, regardless of the private rights of individuals. 6 Would you like to comment on that, please, Mr Smart?</p> <p>7 A. Yeah, it's our job to check that the story is true. We 8 run it by an agent. We run it by the celebrity 9 directly. That's our first obligation, to make sure the 10 story is correct.</p> <p>11 Q. Maybe I misunderstood it. Are you saying that that is 12 just one consideration which you weigh up, and it may be 13 the first consideration, whether the story is true, but 14 having ascertained whether or not it's true, if it is 15 true, you then go on to weigh up other public interest 16 and also the private interests of the subject of the 17 story; is that correct?</p> <p>18 A. That's correct, yes. If there is hypocrisy I believe is 19 going on then we will expose that, yes.</p> <p>20 Q. Can I ask you about hypocrisy. What do you mean by 21 "hypocrisy", Mr Smart?</p> <p>22 A. If you had a pop star, for example, who was seen as 23 a role model and privately they were behaving in a way 24 that wasn't a role model and they'd spoken publicly 25 about, you know, a certain issue and that was clear to</p> <p style="text-align: center;">Page 54</p>	<p>1 an issue, and then they've acted in a way in their 2 private life which contradicts that express statement, 3 and someone being a role model in the looser sense. 4 They've said nothing about any issue, but people might 5 think, well, they occupy a certain position, therefore 6 they ought to be behaving in a particular way. Do you 7 see that distinction, Mr Smart?</p> <p>8 A. I do, yes.</p> <p>9 Q. Is it the policy of the Sun that it's only in the first 10 category of case, namely someone who has expressly taken 11 a position on a particular issue, that it would be 12 appropriate to publish contradictory material which 13 might relate to their private life?</p> <p>14 A. Sorry, I don't really understand the question you're 15 asking.</p> <p>16 Q. Is it only if the situation where someone has expressly 17 taken a position on a particular issue --</p> <p>18 A. That's often the case, yes.</p> <p>19 Q. But is it the policy of the Sun that even in the second 20 case, when someone has not, as it were, taken an express 21 position but they are, some would say, a role model, 22 that you would nonetheless publish something relating to 23 their private life if you felt it was necessary to 24 expose the truth and set the record straight?</p> <p>25 A. It's the nature of celebrity, I think, that we will</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 write stories about people in the public eye, yes. 2 Q. That's regardless of whether they've taken and 3 express position on a particular issue? 4 A. Yes. 5 Q. Is that right? 6 A. I would say that, yes. 7 Q. Is this because you take the view that a lot of what you 8 do, in your own words, is trivial and not particularly 9 damaging? 10 A. Some of it is trivial, but at the same time, in my 11 career at the Sun I've interviewed an alleged rape 12 victim who bravely waived her right to anonymity. Last 13 week I did an interview with a victim of domestic 14 violence, so sometimes I write about trivial issues, 15 sometimes I write about serious issues. I work for 16 a mass market newspaper. My job is to provide 17 entertainment, and in that paper I provide 18 entertainment, but alongside that we will discuss a lot 19 more serious issues. 20 Q. Can I put to one side the serious issues you've rightly 21 addressed and talk about the issues bearing on 22 celebrity. 23 A. Sure. 24 Q. Is this your position: "Well, a lot of what we do is 25 trivial and not particularly damaging, therefore Page 57</p>	<p>1 a public place, and I thought the detail -- the 2 circumstances of the story might have been difficult, 3 but overall it was a case of every cloud having a silver 4 lining. It was a story that brought a lot of happiness 5 to a lot of our readers, and actually, a couple of 6 months later, in the press conference when the news was 7 announced that the band were back together, they said 8 exactly, that every cloud has a silver lining, there 9 were difficult circumstances, but on the whole it was 10 a great, great thing to happen. 11 I weighed that up. One thing, as showbiz reporters 12 now, that we have to deal with is we're accountable very 13 quickly on Twitter. If there's an issue at all, then 14 I know about it as soon as the newspaper hits the news 15 stands. In that case, for example, the family involved 16 got in touch and I was in dialogue with them, they 17 weren't happy, and I think I showed a responsible 18 attitude by taking their feelings on board, and I'd like 19 to think that after they'd gone through the curve of 20 grief, as people call it, that they realised that I'd 21 acted responsibly in that case. 22 Q. The conversation you had with the members of the family 23 was after the event, wasn't it? It was after the 24 photograph had been published? You make that clear, 25 don't you? Page 59</p>
<p>1 celebrities are fair game. We can publish what we like 2 about them regardless as to possible intrusion into 3 their privacy"? Is that the Sun's position? 4 A. Free speech weighs heavily in the balance for me, yes. 5 I think we do take it very responsibly and we act 6 ethically and we act responsibly at all times, yes? 7 Q. Sorry, is the answer to my question "yes" or "no"? I 8 think it might be "yes". 9 A. Yes. I think it probably is, yes. 10 Q. In paragraph 15, you deal with another particular case 11 about a band reunited for the first time after an 12 acrimonious split. That was a situation where you did 13 decide to publish the story, notwithstanding the 14 circumstances in which the photograph had been taken -- 15 and you're quite clear about it -- by a pub barman at 16 the wake of one of the band member's mothers. Wouldn't 17 that be a clear case, I would gently suggest to you, of 18 intrusion into privacy? 19 A. Yeah, I understand that argument wholeheartedly, and 20 it's something I pained over at the time. Intrusion 21 into grief is something I take very seriously indeed, 22 you know, and I weighed that one up. The picture was 23 taken at the wake, it was taken by a barman in the pub 24 and the band members who were reunited agreed to pose 25 for the picture, so they were happy to pose up for it in Page 58</p>	<p>1 A. We did put the story to them beforehand, yes, and 2 I spoke to the PR involved and through mutual friends of 3 the band as well, I let them know that this story would 4 be running. 5 Q. Yes. Can I understand what your evidence is about that? 6 Was it made clear to you that members of the family did 7 not want the photograph published? 8 A. It wasn't, no, not before publication. At the time the 9 family happened to be in LA. These stories move very 10 quickly as well. If I hadn't got it in the paper that 11 night, then it would have appeared on Twitter and we 12 would have lost the exclusive. 13 Q. This is my last question on this topic. Didn't you 14 feel -- or maybe, looking back on it, do you not now 15 feel -- that there was a reasonable expectation of 16 privacy, namely a photograph taken at the wake of one of 17 the band member's mothers? 18 A. As I explained, it was a balancing act and I weighed it 19 up and I spent a lot of time thinking about it because 20 I was very sensitive to that issue and I think I was -- 21 I made the right decision on that one. I really believe 22 that. 23 Q. Thank you. 24 LORD JUSTICE LEVESON: One of the things that arises out of 25 what you've just said is that in time gone past you did Page 60</p>

<p>1 have rather longer to make your mind up about these 2 issues, but if you're concerned about deadlines and 3 Twitter and stories entering the public domain through 4 some other route, you don't have any time at all any 5 more? 6 A. We do have time. It's a combination of those things. 7 The way we are in newspapers at the moment, those are 8 big considerations for us now, to consider social 9 networking, social media. We do have pressure with 10 deadlines -- there's no escaping that -- but we do take 11 time to consider the full implications of a story. 12 I had a conversation with more than one person in the 13 office about whether I was making the decision or not. 14 MR JAY: Out of interest, do you monitor what's on Twitter, 15 for example? 16 A. You can't help not monitoring. Yes, I do, yeah. I take 17 some of it with a pinch of salt. 18 Q. There will be inevitably a variety of responses, but the 19 question was whether you monitor what you read, and it 20 probably follows from that that you do take into account 21 what you read; is that right? 22 A. I absolutely do, yes. 23 Q. Can I ask you about paragraph 18 of your first 24 statement. This is dealing with the issue of incentives 25 and bonuses. You say:</p> <p style="text-align: center;">Page 61</p>	<p>1 the public are encouraged to do so; is that correct? 2 A. That's correct. On page 2 and at the top of the Bizarre 3 column and we have our email address at the bottom of 4 all the stories we write on news and the Twitter address 5 appears at the top of my page as well. 6 Q. You also make it clear that cash payments have become 7 rarer in recent years, although presumably payments by 8 other means, by bank transfer or whatever, those often 9 remain the case; is that correct? 10 A. That's right. Almost all of my contacts are paid 11 directly into the bank, yes. 12 Q. Is there an issue, in your mind, about the reliability 13 of the stories you're receiving because you're having to 14 pay for them? 15 A. We always ask the questions to make sure we're 16 comfortable with that. Ask rigorous questions. 17 Q. How do you satisfy yourself, in circumstances where 18 you're having to pay for the story, that you are getting 19 a reliable story? 20 A. Seek corroboration, check with the PR, and often -- and 21 in a lot of the cases now, I'll speak directly to the 22 person involved. That's one thing I really want to 23 point out, is that I do have a close relationship, and 24 my staff do, with a lot of the people we write about, so 25 it with be quite easy sometimes to get rid of the</p> <p style="text-align: center;">Page 63</p>
<p>1 "The production of exclusive and important articles 2 for the paper is a fundamental means of building 3 a career in news or showbiz journalism. It is an 4 essential part of the job, rather than something extra 5 for which we are rewarded." 6 All of that may be pretty much self-evident, but 7 does this not create a constant pressure on you, 8 Mr Smart, to deliver, because if you don't, either you 9 won't be promoted or, at worst, you might lose your job? 10 A. I think that's true, yeah. There's a huge pressure on 11 me to deliver. There's an old analogy in the Sun 12 newsroom about working for the Sun is like playing 13 centre forward for Manchester United. If you don't 14 score, then you get the hairdryer treatment and get 15 dropped. I have to deliver exclusives. That's my job. 16 I'd expect that pressure if I worked in the legal 17 profession or any other business. 18 Q. That saying about being a Premier League centre forward, 19 that still holds in the Sun? 20 A. I still hear it mentioned, yes. Although I'm 21 a Hibernian FC fan, and we're not quite as good. 22 Q. Can I ask you about another matter, namely payment for 23 stories. I think on the Bizarre page, or perhaps on 24 page 2 of the Sun, there's a telephone number, where you 25 can phone in directly if you have a story and members of</p> <p style="text-align: center;">Page 62</p>	<p>1 stories that don't stand up very quickly indeed. 2 Q. You've rightly made it clear that your practice is 3 usually to seek corroboration either from the person 4 involved or their agent. Are you able to give 5 a percentage, Mr Smart, as to the number of occasions or 6 the quantity of stories in your column which in fact 7 have been substantiated, either by direct contact with 8 a celebrity or their agent? Is it 50 per cent, 9 80 per cent? 10 A. It's quite difficult to put a percentage on it. If you 11 look at the column, on average I'll write ten stories a 12 day, so over a week 60 stories, 3,000 stories a year. 13 There's a lot of material that goes through. The lead 14 on Bizarre, for example, and the second lead, are the 15 most prominent stories, so we'll always make sure 16 they're checked out, but the more trivial stories, the 17 shorts, as we call them, we might not put calls in on 18 them. 19 Q. So is the issue more (a) the prominence of the story and 20 then (b) the relative triviality of the story? 21 A. Yeah, that's fair to say. You have to remember my 22 position. I'm a reporter and an editor so -- last week, 23 for example, I wrote two front page stories, a feature, 24 which is 1,200 words in the paper, as well as six double 25 page spreads in the week along with my team. So there's</p> <p style="text-align: center;">Page 64</p>

<p>1 a lot of material that passes through as well. Very 2 busy people.</p> <p>3 Q. Were you involved at all in the Hugh Grant piece, 4 a short piece in the Sun -- I don't think it was on the 5 Bizarre page -- involving his visit to a London hospital 6 on a health scare?</p> <p>7 A. I was involved in that story, yes. It was a member of 8 my staff who received the call about that story from an 9 agency.</p> <p>10 Q. Yes. How was the public interest weighed up in relation 11 to that story, Mr Smart?</p> <p>12 A. It's the balancing act we've talked about already. We 13 were given the tip-off from a reliable source and we put 14 the call in to Hugh Grant's agent. He came back -- 15 I think, from my memory, it was about two days later. 16 They confirmed the story although they refused to 17 comment. At the time, he'd been in the public waiting 18 room so a lot of people had seen him, and so the story 19 was written up that he'd turned up short of breath, as 20 I remember, and we filed the story through to news, and 21 at that point the backbench and the editor will make 22 a decision about whether they want to publish when they 23 weigh up the public interest argument there.</p> <p>24 Q. Maybe the question is more fairly directed at the editor 25 rather than you because you did not personally weigh up</p> <p style="text-align: center;">Page 65</p>	<p>1 fortunately. You knew that the story was only -- I say 2 that advisedly -- a minor health scare, but I think the 3 point I'm making is that nonetheless it was purely 4 a private matter. True, he chose, as we all might, to 5 go to an Accident & Emergency department, which, in 6 a sense, is open to other members of the public, but it 7 was entirely a private matter, wasn't it, Mr Smart?</p> <p>8 A. I see the argument, yes, I do, and on the scale of 9 health stories, you know, it is a very small issue, but 10 I think because he's such a famous person in the 11 country, we have a duty to report news to our readers.</p> <p>12 Q. So is this right: it was the fact of his celebrity which 13 tilted the balance?</p> <p>14 A. Yes.</p> <p>15 Q. Thank you.</p> <p>16 Mr Smart, in paragraph 28 of your statement, you 17 deal with three further examples of weighing up the 18 public interest in publication against the private 19 interests of the individuals. If you don't mind, we'll 20 take those as read but we're grateful for those examples 21 and no doubt you could give us many more. These are 22 just illustrations.</p> <p>23 A. That's correct.</p> <p>24 Q. Can I ask you about your second statement, which deals 25 with the evidence of Mr Chris Atkins. Can I summarise</p> <p style="text-align: center;">Page 67</p>
<p>1 the public interest in the story against the private 2 rights of Mr Grant. Is that --</p> <p>3 A. I don't want it to seem like I'm passing the buck. I've 4 dealt with my member of staff about it and I've 5 discussed the public interest issue there, in that case, 6 because I realised it was sensitive, because I know 7 Hugh Grant doesn't particularly like being written about 8 in the papers. I handled it very sensitively, sent it 9 through to the editor and allowed him to make a 10 decision. I think it appeared on page 3 as a 11 six-part(?) story, which would be probably the least 12 important story on that page.</p> <p>13 Q. In your own words, Mr Smart, what was the public 14 interest in publishing the story? Was it not entirely 15 a private matter, namely a health issue relating to 16 Mr Grant?</p> <p>17 A. I understand that argument, but he is one of the most 18 famous actors in the country and he had turned up in 19 a public place in front of other members of the public 20 and I think it was our duty to investigate that story 21 because it might have been for a more serious incident, 22 perhaps a car crash or maybe somebody had tried to mug 23 him. We had to check it out and we did check it out. 24 We put it to the agent.</p> <p>25 Q. But you knew that it wasn't a serious incident,</p> <p style="text-align: center;">Page 66</p>	<p>1 it in this way, because we've read the statement -- may 2 I check that you've received the statement?</p> <p>3 LORD JUSTICE LEVESON: I've read it.</p> <p>4 MR JAY: Good, thank you.</p> <p>5 The point is that Mr Atkins arranged for two spoof 6 calls to be put through to the Sun. I think both of 7 them were to the Bizarre desk. I mean, they weren't, it 8 might be said, earth-shattering stories, but that 9 doesn't matter. One of them related to the reading 10 habits of one of the members of Girls Aloud, I think. 11 She was reading one of Steven Hawkins' books. The 12 other, I think, if I remember rightly, related to an 13 incident with Mr Guy Ritchie and something that happened 14 in a restaurant. But the outcome was that both of these 15 stories ended up in the Sun, although it happened 16 neither was true. Is that correct?</p> <p>17 A. Well, I would disagree that they weren't true. To put 18 it in context to start off with, we do receive a lot of 19 crank calls. At that time in particular, Scott Mills on 20 Radio One was ringing up regularly trying to broadcast 21 spoof calls. Every time he did that, off the back of 22 it, we'd receive numerous calls from teenagers trying to 23 mimic what he had done, as well as a TV series called 24 Facejacker, one called Phonejacker who'd ring us up 25 regularly. Not just us; the news desk regularly</p> <p style="text-align: center;">Page 68</p>

<p>1 received crank calls. On top of that as well, we 2 received regular emails with misleading information. 3 But in the process of checking this story, both -- 4 my member of staff rang a PR and checked it out, even 5 though it was quite a trivial issue, and also they 6 informed me about the story at the time. I think I put 7 a call in as well. The interesting thing here as well 8 is that I know Sarah Harding personally and I know Guy 9 Ritchie personally and the assumption was that we don't 10 know these people. With Sarah Harding, for example, 11 last week I was in her house and she had quite an 12 impressive library, actually. And Guy Ritchie as well, 13 I've got good contacts around that. Around that time, I 14 knew he had been in the restaurant and I managed to 15 corroborate the fact that he was drunk and misbehaving 16 in that restaurant, so one or two paragraphs about him 17 injuring himself juggling I thought was really trivial. 18 Q. But in that particular incidence incorrect, I think we 19 agree, don't we? The juggling of the cutlery part was 20 incorrect? 21 A. It's such an insignificant part of the story. It was 22 one paragraph at the bottom. Who knows? I think 23 Mr McKenzie pointed out that there will be some issues 24 in these stories. It's a trivial story. He injured 25 himself in a restaurant when he was drunk.</p> <p style="text-align: center;">Page 69</p>	<p>1 don't we? 2 A. You could argue that, yes. 3 Q. You're not saying it is true, are you? 4 A. We don't know. Maybe I'll give Mr Richie a ring 5 afterwards and ask what precisely -- 6 LORD JUSTICE LEVESON: It would be quite a remarkable 7 coincidence if Mr Atkins invented a story that sounds 8 bizarre and it happened to be true. That would be 9 remarkable. 10 A. It is bizarre. That's the name of the column. 11 LORD JUSTICE LEVESON: All right. Well, it's a mindset, 12 isn't it? 13 A. It is. 14 MR JAY: Thank you. Do you have any knowledge of 15 phone hacking at the Sun or not? 16 A. To the best of my knowledge, no. 17 Q. What does that mean? 18 A. I have no knowledge of phone hacking at the Sun. 19 Q. Is your evidence that phone hacking, to your personal 20 knowledge, did not take place at the Sun? 21 A. That's correct. 22 LORD JUSTICE LEVESON: Do you remember the News of the World 23 in 2003/4? 24 A. I worked there for three months, yes. I was a very 25 junior member of staff at that point.</p> <p style="text-align: center;">Page 71</p>
<p>1 Q. It might be said, with respect to what you do, that the 2 whole thing is trivial and therefore why publish any of 3 it? 4 A. I share your frustrations and I find it incredible that 5 we're discussing this, you know. 6 LORD JUSTICE LEVESON: Actually, what we're discussing is 7 the suggestion somebody deliberately made up a story and 8 phoned you up and then it appeared in the newspaper. 9 I don't consider that's entirely trivial. Do you? 10 A. No, I don't, and we take it seriously. We called the 11 PR, we checked it out, and he said he had no issue with 12 the story. He didn't want to ring the person, Sarah, 13 directly about it because he said it sounds like her. 14 He said, "It wouldn't surprise me at all if she owned a 15 book like that", and that was a green light for me to 16 publish. On Guy Ritchie, I checked with the restaurant. 17 They said he was drunk and misbehaving. I didn't really 18 want to hassle him at the time. I think he was having 19 quite a difficult time. I didn't want to ring and ask 20 if he'd hurt himself juggling cutlery, so -- 21 MR JAY: So you lobbed it in, maybe? 22 A. We wouldn't lob it in. We place our stories, Mr Jay. 23 Q. We know that part, Mr Smart -- I mean, I know it's 24 slightly cheeky of me to put it in those terms but we 25 know the bit about the juggling of cutlery was untrue,</p> <p style="text-align: center;">Page 70</p>	<p>1 MR JAY: The same question needs to be asked: do you have 2 personal knowledge of phone hacking going on at the 3 News of the World? 4 A. I didn't observe that, no. 5 Q. The final point is in relation to the evidence of 6 Charlotte Church, tab 14. On the pagination at the 7 bottom right, the last numbers are 33142. Do you see 8 those numbers? 9 A. Yes. 10 Q. Did you have any involvement with this story? 11 A. Not that I recall, no, I don't think I did. I might 12 have been involved at some point speaking to the agent 13 if that was 2007 -- 14 Q. That's right. 15 A. -- but it's John Coles' story, so he would have handled 16 it. He might have rung me and asked me for a number for 17 an agent to put the story to at some point, as is often 18 the case at the paper. 19 Q. It's right to point out it's not your byline. 20 A. It's not my byline, no. 21 MR JAY: Okay. Thank you very much, Mr Smart. 22 A. No problem. 23 LORD JUSTICE LEVESON: Thank you. We'll now take seven 24 minutes. Thank you. 25 (11.53 am)</p> <p style="text-align: center;">Page 72</p>

<p>1 (A short break)</p> <p>2 (12.02 pm)</p> <p>3 MR JAY: Sir, the next witness is Mr Duncan Larcombe, who is</p> <p>4 under your tab 4.</p> <p>5 LORD JUSTICE LEVESON: Thank you.</p> <p>6 MR DUNCAN ROBERT PRICE LARCOMBE (sworn)</p> <p>7 Questions by MR JAY</p> <p>8 MR JAY: Sit down, please, Mr Larcombe and first of all</p> <p>9 could you provide us with your full name?</p> <p>10 A. Duncan Robert Price Larcombe.</p> <p>11 Q. Thank you. In file 2, from those three files in front</p> <p>12 of you, under tab 4, you'll find located your witness</p> <p>13 statement of 14 October of last year.</p> <p>14 A. Yes.</p> <p>15 Q. You've provided a statement of truth at the end of the</p> <p>16 statement and signed it. Is in your formal evidence to</p> <p>17 the Inquiry?</p> <p>18 A. Yes, it is.</p> <p>19 Q. You currently are the royal editor of the Sun and have</p> <p>20 been since January 2011; is that correct?</p> <p>21 A. That's correct.</p> <p>22 Q. Before that, you were defence editor for a period, you</p> <p>23 were a royal correspondent between 2005 and 2009, and</p> <p>24 you first joined the staff of the Sun in October 2002;</p> <p>25 is that right?</p> <p style="text-align: center;">Page 73</p>	<p>1 I think.</p> <p>2 Q. Thank you. Can I ask you this other general question:</p> <p>3 you've been at the Sun now for nearly ten years. Has</p> <p>4 the culture of the Sun changed at all during that</p> <p>5 period?</p> <p>6 A. I think overall probably. I mean, when I first started,</p> <p>7 you'd sit down and to your left you might have someone</p> <p>8 with 35 years' experience, to your right, someone with</p> <p>9 30 years'. I think now the staff probably -- they don't</p> <p>10 have that sort of level of experience. They're younger.</p> <p>11 It probably feels slightly more like a -- it's certainly</p> <p>12 a younger newsroom now. But culturally? No. It's</p> <p>13 still a great place to work.</p> <p>14 LORD JUSTICE LEVESON: I don't think Mr Jay was asking you</p> <p>15 about the atmosphere in the office.</p> <p>16 A. No?</p> <p>17 LORD JUSTICE LEVESON: But the approach to the business of</p> <p>18 journalism.</p> <p>19 A. Okay. No, the culture at the Sun -- there's been an</p> <p>20 obsession with getting stories right and I don't think</p> <p>21 that's changed at all.</p> <p>22 MR JAY: Can I ask you finally this general question: do you</p> <p>23 have any knowledge of phone hacking at the Sun?</p> <p>24 A. No.</p> <p>25 Q. Dealing, please, with your witness statement, you make</p> <p style="text-align: center;">Page 75</p>
<p>1 A. That's correct.</p> <p>2 Q. Although you are described as the royal editor, is it</p> <p>3 fair to say that you are really a reporter and you don't</p> <p>4 have any reporters working under you?</p> <p>5 A. That's right.</p> <p>6 Q. Can I deal first of all, please, with some general</p> <p>7 matters. Your relationship with the press office or</p> <p>8 press officers of the Royal Family at Clarence House or</p> <p>9 elsewhere, how does that work?</p> <p>10 A. Being the royal correspondent or editor, I'm the kind of</p> <p>11 person who would be the go-between between the paper and</p> <p>12 the palace. So as part of that, I'm expected to build</p> <p>13 a very good relationship with both Buckingham Palace</p> <p>14 press officers and Clarence House press officers to make</p> <p>15 sure that there's a dialogue, basically, and they have</p> <p>16 someone they can come to and we have someone that we can</p> <p>17 go to.</p> <p>18 Q. Is your relationship with Buckingham Palace and Clarence</p> <p>19 House good?</p> <p>20 A. I think it's very good. We have our moments, but</p> <p>21 overall I think we get on well.</p> <p>22 Q. Has it always been good in your time there?</p> <p>23 A. Yes. When I took over as royal reporter, I was invited</p> <p>24 to go and have a cup of tea at Clarence House to meet</p> <p>25 the team, and ever since then we've got on fine,</p> <p style="text-align: center;">Page 74</p>	<p>1 it clear in paragraph 3 that the staff handbook makes it</p> <p>2 clear there's an expectation on reporters to adhere to</p> <p>3 the PCC guidelines in the course of their employment.</p> <p>4 Has there been a change in the handbook, to your</p> <p>5 knowledge, over the years?</p> <p>6 A. I don't -- I'm not aware of there being a change.</p> <p>7 I think that obviously new measures have come in, which</p> <p>8 I think I touch on in the statement, but whether that</p> <p>9 relates in the handbook or not, I'm not sure.</p> <p>10 Q. Okay. You deal with a specific example where an ethical</p> <p>11 question arose in paragraph 4. This relates to a flying</p> <p>12 course at an RAF base which the two princes were taking</p> <p>13 part in in 2009. You published the story in a way which</p> <p>14 would not identify the property; is that correct?</p> <p>15 A. Yes.</p> <p>16 Q. That was following discussions with Mr Dudman of the</p> <p>17 PCC; is that right?</p> <p>18 A. That's correct.</p> <p>19 Q. How often are you in contact with the PCC over stories</p> <p>20 or potential stories?</p> <p>21 A. I've never been in direct contact with the PCC</p> <p>22 personally. Obviously that's the managing editor,</p> <p>23 Graham Dudman, or previous managing editor.</p> <p>24 To be honest, on the royal beat, it doesn't kind of</p> <p>25 get that far because, you know, when you are discussing</p> <p style="text-align: center;">Page 76</p>

<p>1 a story ahead of publication, if there are issues that 2 might potentially involve the PCC, my first point of 3 call would be the press officers of either Buckingham 4 Palace or mainly Clarence House.</p> <p>5 Q. What percentage of royal stories in the Sun are notified 6 in advance to other Buckingham Palace or Clarence House 7 before they're published? Can you give us a feel for 8 that?</p> <p>9 A. I can. Obviously if I've put out a press statement, you 10 don't have to check it with them, because they've done 11 it, but in terms of exclusives, 100 per cent. If I have 12 an executive story about the royals, I will always try 13 and notify them before we publish.</p> <p>14 Q. Yes. But are there occasions when you publish a story 15 having failed to notify them, notwithstanding your 16 attempt to do so?</p> <p>17 A. If I have, it's only on sort of very, very minor stories 18 that it frankly wasn't worth even bothering them on, but 19 we speak probably -- well, pretty much daily with the 20 palace and we know them well, so we know it's not 21 unusual for us to call. But I think it's particularly 22 important with royal stories that you get it 23 100 per cent right.</p> <p>24 Q. Why do you say that?</p> <p>25 A. I think -- well, from my point of view, the Sun is</p> <p style="text-align: center;">Page 77</p>	<p>1 specialist writer on a particular area is important to 2 me.</p> <p>3 Q. I wasn't seeking to downplay that, but I think we've got 4 the picture. There are three factors you would put in 5 the balance, in no particular order maybe, or maybe the 6 third factor should be the first? You tell me.</p> <p>7 A. I haven't thought about it.</p> <p>8 Q. In paragraph 10 of your statement, you tell us that you 9 can recall that after the original phone hacking arrests 10 all reporters were briefed by desk heads on 11 News International's zero tolerance approach to 12 law-breaking by members of staff in the course of their 13 work. That was clearly in or about August 2006, because 14 we know the date of the arrests. Was the briefing 15 limited to phone hacking or did it go wider?</p> <p>16 A. No, I think that would have been after -- well, it may 17 have been after the convictions, actually, rather than 18 after the arrests. No, I mean that was specifically in 19 relation to phone hacking. I mean, that was the issue 20 that had come up in court. I just remember us all being 21 told, basically, that if anything -- if any of us act in 22 that way, then we'll be out the door.</p> <p>23 Q. Who gave that briefing? Can you recall?</p> <p>24 A. I've been trying to. I can't remember. I thought it 25 was an email, but I haven't been able to find like</p> <p style="text-align: center;">Page 79</p>
<p>1 a very pro-royal paper because I think our readers are 2 very fond of, for example, William and Harry, and 3 I think if we get royal stories wrong, then the readers 4 may well be on the princes' side rather than ours, which 5 may not quite apply if you're writing about 6 a paedophile, perhaps.</p> <p>7 I just think the one thing Clarence House asked for 8 in that cup of tea that I had when I first met them 9 was -- they will say, "We will never lie to you or 10 mislead you on a story, we won't leak a story if you 11 come to us with an exclusive, but we would really 12 appreciate if you could give us the heads up before you 13 publish." So that's what I do, and wherever possible 14 I don't try and phone them five minutes before deadline; 15 I try and tell them as early as I can in the day to give 16 them time to come back to me.</p> <p>17 Q. Yes. If I can summarise the matter in this way. Are 18 there two powerful factors in play here: one, the 19 continuing good relationship which you need to maintain 20 with Clarence House and Buckingham Palace, and secondly, 21 your assessment of where the sympathies of your 22 readership lie? Is that fair or not?</p> <p>23 A. Well, yes, I suppose that's fair, but also there's the 24 added one that I don't particularly want to write 25 stories that are wrong because the credibility as a</p> <p style="text-align: center;">Page 78</p>	<p>1 a staff email. It may have been that, but it certainly 2 would have been probably from the news editor or head of 3 news at the time.</p> <p>4 Q. Were there any rumours going around the Sun at the time 5 that this sort of activity wasn't limited to the 6 News of the World?</p> <p>7 A. In other papers or the Sun?</p> <p>8 Q. Well, that would include the Sun but it would also 9 include other papers.</p> <p>10 A. Well, there were rumours that the dark arts, as it's 11 sort of been written about since, happens because 12 journalists like to gossip about each other, but 13 certainly there was no rumours about it happening at the 14 Sun, from my point of view.</p> <p>15 Q. Did you personally hear any of this gossip?</p> <p>16 A. Well, yeah, I mean, it's not sort of phone hacking 17 stuff, but just the dark arts. You know, I must say, 18 I'm massively surprised at some of the things that have 19 come out about the News of the World in terms of 20 allegations and the scale of it and some of the people 21 that were allegedly targeted, but not massively 22 surprised that if there was the technology there, it 23 might have been being abused by some journalists on some 24 papers, I suppose. I mean, you think of historically 25 things like the Camillagate tapes, for example, or</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 Squidgygate tapes. I can't for a minute imagine that 2 that was anything other than something to do with 3 technology, so you sort of know that that can happen on 4 Fleet Street, if that makes sense.</p> <p>5 Q. Yes. But in terms of the gossip and rumour that was 6 going around, what other sorts of activities were being 7 discussed in that way? Can you recall?</p> <p>8 A. Maybe I'm making more of this than not, but obviously 9 I think it would be impossible for one of the reporters 10 to be arrested for that kind of allegation without 11 everybody wondering if anybody else was at it, if you 12 like, sir.</p> <p>13 Q. Okay. In paragraph 11, you explain what has happened 14 more recently and briefings from the new chief 15 executive. We'll be hearing from him next week. He'll 16 tell us a bit more about that.</p> <p>17 In paragraph 12 and following, you deal with the 18 issue of checking of sources. The evidence you give 19 here is similar to evidence we've heard from others. Is 20 this right: that you very often won't know the precise 21 identity of the source if the source is not your source, 22 but you will always want to stand up the story; is that 23 correct?</p> <p>24 A. I wouldn't say very often I don't know the source, but 25 yes, my desire would be to make sure I can stand the</p> <p style="text-align: center;">Page 81</p>	<p>1 to me, as the royal man, so I phoned up the tipster, was 2 just given the phone number by the desk, and arranged to 3 meet the guy that afternoon. I went to Paddington to 4 meet him where we'd arranged. He didn't turn up.</p> <p>5 I then thought -- obviously I was thinking: "I wonder if 6 he's gone to another newspaper" or whatever, but 7 primarily, if you'll forgive me, he didn't exactly sound 8 like an old Etonian on the phone and I was slightly 9 confused as to how he might have got hold of these 10 pictures so quickly after they'd just got back from the 11 Caribbean, so I contacted Clarence House press office 12 and flagged it up to them and said that they might want 13 to check if anything's gone missing recently because 14 this is what we were being offered.</p> <p>15 Then the guy did turn up and he claimed that he'd 16 found them in the street. He came back to our office. 17 They were after £25,000. The tipster then had another 18 guy with him. They handed us over the memory stick and 19 then I got a phone call from a police sergeant, I think, 20 saying that this car had been broken into -- Kate's 21 sister's car had been broken into that morning and that 22 in her bag that had been stolen was a camera. I must 23 say, I didn't exactly fall over with surprise, and 24 I think the two guys were then arrested the next day and 25 I gave a statement. I think they pleaded guilty in the</p> <p style="text-align: center;">Page 83</p>
<p>1 story up independently.</p> <p>2 Q. But in the small world in which you operate, how often 3 will it be that you don't know the identity of the 4 source?</p> <p>5 A. Probably -- a small percentage, maybe 5 per cent, if 6 that.</p> <p>7 Q. Then you explain in paragraphs 15 and 16 the system of 8 making check calls to the palace, which you've already 9 told us about in general terms.</p> <p>10 A. Yes.</p> <p>11 Q. In paragraph 17, that the palace makes exceptions when 12 it concerns health matters of the royals, for obvious 13 reasons.</p> <p>14 A. Yeah.</p> <p>15 Q. Then paragraph 18 you give us some good illustrative 16 examples of the checking process. The first one relates 17 to a memory stick which had been stolen.</p> <p>18 A. Yes, that's right.</p> <p>19 Q. Because these are public proceedings, would you like to 20 tell us in your own words more about that example?</p> <p>21 A. Sure. It was quite a typical example. The news desk 22 took a phone call from a member of the public. It 23 involved a royal thing. He was claiming he had pictures 24 of William and Kate on their holiday. They had just 25 returned from the Caribbean. Immediately that was given</p> <p style="text-align: center;">Page 82</p>	<p>1 end and it didn't go to court. Well, I didn't need to 2 go to court.</p> <p>3 Q. Can I move you forward, please, to paragraphs 22 and 23. 4 We've read your other examples, Mr Larcombe, and we'll 5 bear those in mind. But at paragraph 22, you deal with 6 the agreement you made not to publish photographs of 7 Kate Middleton, as she then was -- this was in 2007 -- 8 unless she was with Prince William and therefore under 9 the protection of trained officers. Is that an 10 agreement which other newspapers have followed, to your 11 knowledge?</p> <p>12 A. Yes. I mean, it was Les Hinton, the former chief 13 executive of News International, that made it 14 a company-wide News International policy, so it covered 15 all the titles. It didn't happen straight away, and 16 I know that other papers did that year publish -- 17 I think there was a picture of Kate at a bus stop on the 18 King's Road in the London Evening Standard, I believe. 19 I hope that's not wrong. Forgive me if it is. I think 20 gradually now -- obviously, Kate's married now so she 21 does have protection officers, but I certainly think 22 that had quite a big influence on the behaviour of the 23 paparazzi.</p> <p>24 Q. Then in paragraph 23 -- this was after you became royal 25 editor, early last year -- you met with a number of</p> <p style="text-align: center;">Page 84</p>

<p>1 freelance photographers and underlined that "we would 2 not publish pictures where there had been pursuit, 3 harassment or invasion of privacy of members of the 4 Royal Family". How do you make that assessment in an 5 individual case, Mr Larcombe?</p> <p>6 A. If we're sent in a picture -- it might be a picture of, 7 say, take Kate smiling and looking lovely and happy, but 8 really we've no way of knowing, just by looking at the 9 picture, whether or not, after the picture was taken, 10 she was chased by 10 photographers. So what we did with 11 Clarence House was agree that every picture that we were 12 potentially going to publish involving the royals, we 13 would phone them, check with them. I assume what they 14 do is they then speak into the protection officer that 15 would have been there when the picture was taken, and -- 16 you know, I wouldn't say I've heard horror stories but 17 they've come back to me at times and said, "Actually, 18 the photographer jumped in front of the vehicle", or: 19 "They were chased after that had been taken", or they'd 20 got the picture because they'd chased. So you do hear 21 horror stories and in those situations, we don't publish 22 the pictures. I'd probably say it's more than 23 50 per cent we don't publish, actually, in terms of 24 paparazzi pictures.</p> <p>25 Q. Which percentage? 50 or 15 per cent?</p> <p style="text-align: center;">Page 85</p>	<p>1 communications director at Clarence House and my deputy 2 editor and we pulled the story and never used the 3 pictures at all. But that said, they then appeared all 4 over the Internet around the world, which I think is 5 another consideration.</p> <p>6 LORD JUSTICE LEVESON: That's part of the problem, isn't it, 7 that if members of the Royal Family are to have any 8 privacy at all, everybody has to respect it, if and if 9 they don't, it becomes very difficult?</p> <p>10 A. Exactly.</p> <p>11 LORD JUSTICE LEVESON: And if paparazzi feel they can try it 12 on with you all the time, the fact that they lose 13 50 per cent means that they win 50 per cent.</p> <p>14 A. Yes, that's true. That's one of the -- it's like the 15 elephant in the room, really. You have the Internet 16 there. When Princess Diana died, it wasn't an issue, 17 and the paparazzi were able to make lots of money by 18 chasing her all over the place. But now you have 19 a global market. I could think of several examples of 20 royal pictures recently which, frankly, no one in the 21 British press would touch, not just because of Clarence 22 House, just because -- if you want to put it to ethics 23 or whatever -- that then are plastered all over websites 24 and the Internet, and stories as well.</p> <p>25 LORD JUSTICE LEVESON: But are these individual</p> <p style="text-align: center;">Page 87</p>
<p>1 A. I'd say it's more than half that we don't publish, 2 I would say.</p> <p>3 Q. Is that because the photograph is simply not of an 4 adequate standard --</p> <p>5 A. No.</p> <p>6 Q. -- or is it because there's been some breach of the 7 principles you set out in paragraph 23?</p> <p>8 A. Exactly. The three -- you know, the palace are 9 reasonable people. They're not like some celebrity 10 agents that will do anything and say anything to keep 11 pictures and stories out of the paper. If it's 12 a reasonable picture taken in a reasonable way within 13 the PCC rules, they're not going to say, "You can't use 14 that or we'll complain." So when they tell you: 15 "Actually, that was a pretty nasty incident", or: "We 16 believe that that was private" -- you know, Prince Harry 17 was in Las Vegas recently and we ended up pulling the 18 front page, I think, at about 7.20 on a Monday night 19 because there were pictures of him taken inside a club 20 with 300 people there. When I put that to the palace, 21 they said -- he was just sitting there, like anyone his 22 age, having a beer, I suppose, and the palace's argument 23 was: "He's got a reasonable expectation of privacy and 24 we'd really rather you didn't use the pictures."</p> <p>25 I think there was then a discussion between the</p> <p style="text-align: center;">Page 86</p>	<p>1 photographers or are these commercial organisations of 2 photographers? What are they?</p> <p>3 A. Well, I'd even go further than that. The problem is 4 nowadays every member of the public is a potential 5 paparazzi photographer because they have cameras on 6 their phones. So it's not just even actual photographs; 7 it can be a member of the public that sees Prince Harry 8 in a club or a pub and then the guy has to deal with the 9 fact that that could be all over the Internet. So he's 10 going to be, you know, completely -- have no privacy at 11 all unless he's hiding inside one of his castles.</p> <p>12 LORD JUSTICE LEVESON: That's the problem.</p> <p>13 A. Mm.</p> <p>14 MR JAY: Thank you. I'm not going to ask you about the 15 issue of payments for stories and for tips, because 16 others have dealt with that.</p> <p>17 A. Yes.</p> <p>18 Q. The system now for making cash payments has changed 19 recently. We've also heard evidence as to that.</p> <p>20 I do have a question for you about paragraph 38, 21 Mr Larcombe.</p> <p>22 A. Yes.</p> <p>23 Q. The particular example you give there under (i) is 24 a picture of the newly enobled, I suppose, Duchess of 25 Cambridge -- it was the Thursday after the royal</p> <p style="text-align: center;">Page 88</p>

<p>1 wedding, so it was within a week or so after the royal 2 wedding -- pushing an empty supermarket trolley in the 3 car park of a supermarket near her home in North Wales. 4 You took the view that the picture could be published in 5 the public interest; is that right? 6 A. That's right, yes. 7 Q. What, may I ask, is the public interest in publishing 8 that photograph? 9 A. As I say, it was the first time Kate had been seen in 10 a public place since 2 billion people had watched her on 11 television. Rather than go straight on honeymoon, 12 William and Kate went up to Anglesey and William did 13 a few shifts, because -- that's relevant, because we'd 14 agreed not to go near the honeymoon or even publish 15 where the honeymoon was. 16 Q. You knew where it was, did you? 17 A. We did, yeah. Had they been on honeymoon in Anglesey, 18 then we wouldn't presumably have taken that picture. 19 I think for me it was just such an incredible 20 picture, because it showed this girl who's just entered 21 the Royal Family in front of 2 billion people, and what 22 does she do? She just pushes a trolley and goes 23 shopping on her own. She's not followed by 25 flunkies 24 and butlers or whatever, and it told the story of what 25 Kate really is like. She's a very down-to-earth, normal</p> <p style="text-align: center;">Page 89</p>	<p>1 unfair? 2 A. I think that's slightly inevitable. I mean, we have 3 a good relationship with the palace. The boys and Kate 4 recently came to our military awards exclusively with 5 the Sun, but I would say, to sort of caveat that, 6 I think that's only really possible, to have that 7 deference but that have relationship with the palace, 8 because of that key principle that I know I can phone up 9 the palace with a story that I believe is true and they 10 won't lie to me if it is true. They may say, at worst, 11 "No comment", or they will guide me. 12 If you could have that dialogue with celebrities, 13 and possibly even with people that find themselves 14 thrust into the limelight, then it would be a lot easier 15 on Fleet Street to make the judgment calls, but as 16 I think my colleague Gordon said, sometimes you are 17 desperately seeking accuracy and it's not always 18 possible to get it. 19 LORD JUSTICE LEVESON: But you don't necessarily feel 20 yourself bound by the palace because the photograph to 21 which you've just referred was a photograph which the 22 palace said they would prefer you not to publish? 23 A. That's right. We'll have the dialogue, we'll have the 24 discussion, and there was one between Christmas and New 25 Year which I won't give the detail of, but it was</p> <p style="text-align: center;">Page 91</p>
<p>1 person. 2 But since then -- I mean, that would be my argument 3 to use that in the public interest, weighing -- 4 balancing it off. Since then, there was a picture taken 5 of her shopping in Tesco, I think in about October or 6 whenever, and we were offered that picture but we didn't 7 use it because: so what? Kate's shopping in Tesco's? 8 It's not -- the balancing act is totally different, 9 although I think one paper did use that picture. 10 Q. So you felt that in the particular circumstances of this 11 case, namely so soon after the royal wedding, she was 12 carrying out a mundane activity in an ordinary way, and 13 the public interest outweighed her private rights? Have 14 I correctly summarised it? 15 A. On that instance, but as I say in the statement, if 16 you'll excuse referring back to an earlier witness, with 17 royal stories, if I'd adopted the view on many occasions 18 just to lob the story in, I would be lucky if I was even 19 working in Tesco's myself. It doesn't work like that on 20 royal stories, and it frankly doesn't work like that on 21 Fleet Street any more, but ... 22 Q. It may be the sense of your evidence -- but contradict 23 me if I'm wrong -- that there's a greater sense of 24 deference shown to royalty, for whatever reason, than 25 there might be towards celebrities. Is that fair or</p> <p style="text-align: center;">Page 90</p>	<p>1 a picture taken in a private club of a member of the 2 Royal Family dancing on a table with their arms out. We 3 would have liked to have used that picture. We had 4 a discussion with the palace press office. They said 5 they felt it was private, and we didn't use that 6 picture, and as far as I know, that picture hasn't been 7 used. 8 But could I have that same discussion if I was 9 a showbiz reporter and I wanted to ring up Steve Coogan? 10 I suspect I probably couldn't because his agent would 11 probably -- not Steve Coogan but anyone. If you can't 12 trust celebrity agents, than frankly I don't know why 13 people would even bother ringing them. 14 MR JAY: Are you suggesting that one can't trust celebrity 15 agents? 16 A. Yes. I shouldn't have mentioned Steve Coogan because 17 I don't know his agent or have dealt with him. 18 Q. We'll airbrush him out of your answer -- 19 A. That's what he wants, isn't it? I think he'd quite like 20 it, wouldn't he? 21 Q. I think you might have been a more general point. 22 A. I was trying to make a general point, yes. 23 Q. Although it's right that you did mention his name, but 24 what are you suggesting in relation to celebrity agents 25 in your experience, compared with Clarence House and</p> <p style="text-align: center;">Page 92</p>

<p>1 Buckingham Palace?</p> <p>2 A. I have had direct experience early in my career, before</p> <p>3 I started working with royals, where I know I have been</p> <p>4 lied to or deliberately misled when I have been trying</p> <p>5 to legitimately tried to put a story to a celebrity</p> <p>6 agent and I'm frankly quite pleased that I don't have to</p> <p>7 deal with them any more and I get to deal with the guys</p> <p>8 at the palace.</p> <p>9 Q. I think the final question, Mr Larcombe: we know of one</p> <p>10 example where you, as it were, overruled Clarence House,</p> <p>11 or rather they said they would prefer that you didn't</p> <p>12 publish the photograph, but you nonetheless did. How</p> <p>13 many other occasions can you recall where you've come to</p> <p>14 the same conclusion?</p> <p>15 A. Well, my colleague and I wrote the "Harry the Nazi"</p> <p>16 story. I'm sure the palace would have preferred we</p> <p>17 didn't use that one, but we did.</p> <p>18 They're pretty good. They know that if they can't</p> <p>19 object on the grounds of the PCC, you know, they're</p> <p>20 going to allow us, if you like -- they might not like it</p> <p>21 but they will accept that we are a newspaper and that</p> <p>22 royals are of interest or in the public interest to be</p> <p>23 written about.</p> <p>24 Q. I'm not sure we've got a sense on how many occasions</p> <p>25 you've --</p> <p style="text-align: center;">Page 93</p>	<p>1 statement, which is signed by you and dated 19 December</p> <p>2 of last year; is that correct?</p> <p>3 A. That's correct.</p> <p>4 Q. You've appended a statement of truth to the statement.</p> <p>5 Is this your formal evidence to the Inquiry?</p> <p>6 Can you tell us about yourself? You've been picture</p> <p>7 editor of the Sun since the year 2000?</p> <p>8 A. I have.</p> <p>9 Q. Is that right? Can you tell us a little bit about your</p> <p>10 earlier year?</p> <p>11 A. Yes. Before I was made picture editor in 2000, I joined</p> <p>12 the Sun in 1992 as an assistant picture editor. I began</p> <p>13 my newspaper career in 1988, operating an electronic</p> <p>14 picture desk, which is an area of the desk where all the</p> <p>15 wire pictures from AP, Reuters, Press Association come</p> <p>16 into. You would then sort of print those out and give</p> <p>17 them to the picture editor.</p> <p>18 Q. Thank you. And it runs in the family, since your</p> <p>19 father, as I understand -- is he still the royal</p> <p>20 photographer of the Sun?</p> <p>21 A. Yes.</p> <p>22 Q. And has been for more than 30 years?</p> <p>23 A. Yes.</p> <p>24 Q. In paragraph 2, you explain the circumstances or manner</p> <p>25 in which photographs are provided by the Sun. You have</p> <p style="text-align: center;">Page 95</p>
<p>1 A. Oh, sorry, yes, yes.</p> <p>2 Q. Is it just a handful?</p> <p>3 A. Where we go against the direct wishes? It's quite rare,</p> <p>4 to be honest. If they say -- I mean, there was one in</p> <p>5 the summer where William and Kate were in Holyrood</p> <p>6 Palace grounds in the park with the public and there was</p> <p>7 a guy playing frisbee in the background of the pictures.</p> <p>8 There was no real reason why we couldn't have used those</p> <p>9 pictures. They just asked us a favour to not use it and</p> <p>10 we didn't. We knew that they were going to come to our</p> <p>11 military awards and the relationship's there. It wasn't</p> <p>12 really going to set the world on fire, so we dropped it.</p> <p>13 MR JAY: Thank you very much for your evidence, Mr Larcombe.</p> <p>14 LORD JUSTICE LEVESON: Thank you very much.</p> <p>15 A. Thank you.</p> <p>16 MR JAY: I think we can start our next witness. It's</p> <p>17 Mr John Edwards, under tab 11.</p> <p>18 LORD JUSTICE LEVESON: Thank you.</p> <p>19 Mr JOHN GERARD EDWARDS (sworn)</p> <p>20 Questions by MR JAY</p> <p>21 MR JAY: Mr Edwards, sit down and make yourself comfortable.</p> <p>22 Could you start off by giving us your full name?</p> <p>23 A. John Gerard Edwards.</p> <p>24 Q. Thank you very much. If you look at the second file,</p> <p>25 you'll find under tab 11 a copy of your witness</p> <p style="text-align: center;">Page 94</p>	<p>1 five staff photographers; is that right?</p> <p>2 A. We do. We have a royal photographer -- out of those</p> <p>3 five, we have a royal photographer, a sports</p> <p>4 photographer, we have one based in Bristol, one based in</p> <p>5 Manchester and another news photographer based in</p> <p>6 London.</p> <p>7 Q. Thank you. So that accounts for the five. Then you</p> <p>8 have a pool of 20 regular freelancers who get</p> <p>9 a commission and a percentage of syndication fees?</p> <p>10 A. Yes. I mean, some of those freelancers would be</p> <p>11 guaranteed five or six shifts a week, so, you know, you</p> <p>12 could say they're all -- they're staff but in name,</p> <p>13 really.</p> <p>14 Q. Then there are picture agencies who from time to time</p> <p>15 provide the Sun with photographs which the Sun either</p> <p>16 accepts or rejects; is that correct?</p> <p>17 A. Yeah. There's a constant stream of pictures. I think</p> <p>18 at the end of that paragraph I could mention to you that</p> <p>19 on an average day we get between 15,000 and 20,000</p> <p>20 images for consideration.</p> <p>21 Q. Yes.</p> <p>22 LORD JUSTICE LEVESON: Can I just understand how that breaks</p> <p>23 down? What proportion of those would be from your staff</p> <p>24 or freelancers, what proportion would be from picture</p> <p>25 agencies and the like, with whom you are a commercial</p> <p style="text-align: center;">Page 96</p>

1 relationship, and what proportion will be absolutely
 2 from anybody under the sun?
 3 A. A smaller proportion would be from staff because there's
 4 such a small number of them. The majority of the
 5 pictures, I guess, are from agency, and as technology
 6 increases with camera phones, we do -- are seeing more
 7 pictures from the public. I think Duncan may have
 8 mentioned the picture of the Duchess of Cambridge in
 9 Tesco's. That would have been a picture from a member
 10 of the public. So the majority of the pictures, in
 11 answer to your question, would probably be from agency.
 12 We have a constant stream of pictures coming in from all
 13 round the world, from Associated Press, Reuters, AFP,
 14 and from all round the country, indeed from
 15 Press Association.
 16 LORD JUSTICE LEVESON: Do you have contractual relationships
 17 with these people?
 18 A. With AP, Reuters, PA, yes.
 19 LORD JUSTICE LEVESON: Do they describe the circumstances in
 20 which the picture must have been taken?
 21 A. No. With those agencies, we've been dealing with them
 22 for years and we've never had any problems. We can
 23 trust them completely.
 24 MR JAY: We'll come to that issue in a moment, Mr Edwards.
 25 The term "paparazzi". By some it may be regarded

Page 97

1 a little bit as a term of abuse, but in which category
 2 or any would they be working? Obviously they're not
 3 going to be working as one of the five staff
 4 photographers?
 5 A. No.
 6 Q. That would be quite wrong. Probably it wouldn't apply
 7 to the regular freelancers either. Into which category
 8 with they fall?
 9 A. I mean, they're freelance photographers, effectively.
 10 They work for themselves. I mean, I don't know for sure
 11 if any of them have any contracts anywhere, they do
 12 regular work for any other sort of titles, but a lot of
 13 them are associated to agencies. Showbiz agencies, news
 14 agencies. I mean, I do think the paparazzi name does
 15 actually make a more -- it's not a great name, in my
 16 opinion. It makes them sound -- I mean, I think we've
 17 all come to think that "paparazzi" is, as you say,
 18 a rather a nasty word, but they are effectively
 19 freelance photographers.
 20 Q. Working for particular agencies?
 21 A. Yeah, they work for agencies. Some of them work alone.
 22 Q. But inevitably then the Sun will be receiving, amidst
 23 the 15 to 20,000 photographs a day, some taken by
 24 paparazzi?
 25 A. Indeed, indeed.

Page 98

1 Q. By what process, if I can ask the question generally in
 2 those terms, does the Sun or you satisfy themselves or
 3 yourself that a photograph has been taken in
 4 a non-intrusive fashion?
 5 A. Well, I work with a very experienced team and we've
 6 worked together for a long time now. If we have any
 7 sort of concerns that we think maybe a picture's been
 8 taken in a private environment or there's children in
 9 the picture, we would speak to the photographer or
 10 indeed the agency boss, probably more than likely --
 11 I have great relationships with a lot of the main agency
 12 bosses -- and we would establish the facts on how the
 13 picture was taken, what environment it was, how the
 14 subjects, you know, was treated, if you like, how the
 15 photographer behaved. If we were comfortable with that,
 16 we would put that forward to the night editor, editor,
 17 for consideration.
 18 Q. How often is it possible for you to check with the
 19 subject of the photograph that he, she or they are
 20 satisfied --
 21 A. Recently -- I think I mentioned it somewhere in my
 22 statement, but I can't be sure where -- we took some
 23 pictures or an agency took some pictures of Lily Allen
 24 shopping in Central London somewhere. I think Lily has
 25 now had the baby, but at the time she was heavily

Page 99

1 pregnant. One of my colleagues I was working with that
 2 day, she showed me the pictures and sort of said, you
 3 know: "Do we feel comfortable about this?" She looked
 4 quite happy in the pictures, I have to say, but were we
 5 comfortable with the fact she'd had her picture taken?
 6 It was on a public street but she was obviously
 7 pregnant. We decided that with Gordon's help we would
 8 speak to Lily's agent, and indeed, even though, like
 9 I say, she was laughing and joking and happy in the
 10 pictures, it did turn out that she didn't want those
 11 pictures published and indeed we didn't even offer them
 12 up for publication.
 13 Q. Okay. You give other examples. First of all, under
 14 paragraph 4.2, if I could invite you to look at that,
 15 please, Mr Edwards, in the middle of that paragraph, you
 16 say:
 17 "However, there are frequent examples where I have
 18 refused to publish a photograph on the grounds that it
 19 may have been taken in a context of harassment, or
 20 without regard to privacy, some of which I have
 21 referred ..."
 22 You do give us particular examples, but --
 23 A. I think I mention another example in 5.1. The singer
 24 Robin Gibb, who I think it's well-known is suffering --
 25 is quite ill at the moment. There were pictures of him

Page 100

<p>1 attending a medical appointment, and we kind of -- it 2 was actually one of my colleagues again who spotted it 3 and we decided straight away that was never offered up 4 for publication. It just didn't even reach the 5 back bench, if you like, or the night editor, who is the 6 man who puts the paper together. 7 Q. Yes. 8 A. So there's self-regulation going on there. 9 Q. There are certain celebrities who appear to be 10 particularly the targets of paparazzi photographs, and 11 if you've been following the evidence given to this 12 Inquiry, you'll know who they are. Do you take any 13 particular steps in relation to those celebrities to 14 satisfy yourself that the photograph in question was not 15 taken in an intrusive circumstance? 16 A. Yeah, yeah. Like I said earlier, with a lot of these 17 agencies, I've been dealing -- I've been picture editor 18 for 11 years and I have great relationships with a lot 19 of these agency heads and picture editors. You know, we 20 ring up all the time asking -- if we have concerns, we 21 ring up all the time to say, "How did this happen?", 22 again: "How did the photographer behave? Where was it 23 taken?" 24 Q. How often would you say you get a complaint after the 25 event in relation to the publication of a photograph?</p> <p style="text-align: center;">Page 101</p>	<p>1 my control, I can't think of any. With the ones under 2 my direct control, I can't think of any, but there may 3 have been instances with agencies. I can't recall any 4 now, as I say, but I'm happy to go away and research 5 that. 6 Q. I'm not asking you about particular examples. I'm 7 asking you to try and give us a feel for approximately 8 how many, and you've told us, I think. 9 A. Yeah, a handful. 10 Q. In paragraph 7.1 you give us some further examples. Can 11 I ask you -- I've probably touched on this. At the very 12 bottom of this page, 53350, you say: 13 "With certain public figures or celebrities, we do 14 not offer any pictures for publication except for those 15 that have been taken at a photo call or film premiere 16 because of their previous experience of extreme 17 paparazzi harassment or involvement in privacy 18 litigation." 19 A. If there's certain people we've have problems with in 20 the past, then we will avoid them, yeah. 21 Q. About how many people are we talking about? 22 A. A handful, I would think. I can think of maybe 23 Sienna Miller being one, and ... again, I mean I can't 24 think of the names now, but a handful, yeah. 25 Q. Is that because she, to your knowledge, has obtained an</p> <p style="text-align: center;">Page 103</p>
<p>1 A. How often do I get one? I mean, I can't recall one 2 right now. I mean, I'm happy to go away and check, but 3 I can't recall one. 4 Q. You're the picture editor? 5 A. Yeah. 6 Q. Would it not follow that any complaint about 7 a photograph, if it's alleged, for example, the 8 photograph was taken as a result of harassment, would 9 come to you? 10 A. But that would come to the managing editor's office and 11 then he would speak to me. 12 Q. So you would get to know about -- 13 A. I would absolutely, and then I would take it up with the 14 agency boss straight away. 15 Q. I think my question then was: how often has that 16 circumstance arisen, approximately? 17 A. Not very often. There's not been one -- I can't recall 18 one recently. But as I say, I'm happy to go away and 19 check and report back if you like. I mean, I can't 20 think of one right away. Not one in the last sort of 21 few months. 22 Q. But over the last 11 years? Are we talking about 23 a handful -- 24 A. Yeah, I would say so. I would say there's been a few. 25 I mean I can certainly -- with the photographers under</p> <p style="text-align: center;">Page 102</p>	<p>1 anti-paparazzi injunction? That obviously carries with 2 it certain legal -- 3 A. Yeah, I mean -- yeah. 4 Q. But how is it that you get to know whether a particular 5 public figure or celebrity has had previous experiences 6 of extreme -- 7 A. That would come from, again, the managing editor's 8 office or the legal department would inform us. They 9 would regularly get correspondence to inform us of 10 what's going on in that respect. 11 Q. So is there a sort of list of people who you know -- 12 A. Yeah, we get printed notes and we also get regular 13 emails from the legal department. 14 LORD JUSTICE LEVESON: So if somebody says, "Look, I've had 15 a lot of trouble with this", they can, as it were, 16 encourage the press simply to reject all photographs? 17 A. Yeah, they can, yeah. 18 LORD JUSTICE LEVESON: Just -- 19 A. Yeah. I mean us, the Sun, yes. I mean newspapers, yes. 20 There's a wider market, as you know. I mean, there's 21 a huge market abroad for a lot of these pictures, and 22 websites, et cetera. I mean, I think that does drive 23 a lot of the -- that does encourage certain pictures to 24 be taken. 25 LORD JUSTICE LEVESON: Is that an informal arrangement or is</p> <p style="text-align: center;">Page 104</p>

<p>1 there something formal about it? Namely, is there some 2 device that some celebrity or person could use to know 3 that if they wanted to -- 4 A. It's informal, I would say. Yeah, informal, unless 5 their lawyers contacted the legal department. Then it 6 would become official. 7 MR JAY: Yes. 8 LORD JUSTICE LEVESON: But you're content to respect that 9 sort of arrangement? 10 A. Yes, we are, yeah. Very much so. 11 MR JAY: Can I just understand a little bit more? Is it 12 a case of you receiving an email from your legal 13 department to the effect: "Don't publish photographs in 14 relation to X unless they've been taken in a particular 15 circumstance, namely a photo call or film premiere"? 16 A. Yeah. 17 Q. So you are obeying advice given by your legal 18 department. Or is it a case of the celebrity letting it 19 be known -- 20 A. It's a case of listening to the legal department. 21 Q. So it becomes a question, then, is this right, of simply 22 responding to legal advice, rather than any other sort 23 of informal arrangement? 24 A. Yeah. If you're asking: will a celebrity or agent ring 25 the picture desk and say, "Please don't take pictures of</p> <p style="text-align: center;">Page 105</p>	<p>1 put this picture up, can we put that picture up. So 2 "yes" is the answer. 3 Q. Sorry, if the answer is "yes", you're suggesting there 4 is a different standard -- 5 A. I'm sorry, no. I've got a bit confused. 6 Q. Fair enough. Your evidence, I think, is that the 7 standard is exactly the same? 8 A. Yes, it is exactly the same. Sorry, I got a bit 9 confused. 10 Q. Even though there's someone else -- 11 A. Yeah, but he reports to me directly. He sits on my 12 desk. 13 Q. Thank you. Paragraph 9, you were asked to deal with 14 some specific examples. 15 A. Yeah. 16 Q. The first one relates to Ms Tinglan Hong, who is the 17 mother of Hugh Grant's baby, and you were asked some 18 specific questions about that. The child was born, 19 I think, on 26 September of last year, Mr Edwards, to 20 give us the sort of chronological fix. 21 A. Yeah. 22 Q. You tell us that the Sun did send one of your regular 23 freelance photographers to the woman's home on 24 2 November? 25 A. Yeah.</p> <p style="text-align: center;">Page 107</p>
<p>1 us", that's never happened in my experience. There's 2 a route they go and, you know, we then listen to the 3 advice given to us. 4 Q. But that route may often then be litigation; is that 5 correct? Or you wouldn't necessarily know? 6 A. I wouldn't necessarily know. 7 Q. Okay. In paragraph 8.1, you deal with the issue of 8 digital alteration and you point out that that's not 9 something that you can police; is that right? 10 A. Well, we can police it in the office but I can't police 11 it outside, no. If one of my photographers was caught 12 doing that, they'd be out the door, simply. It's just 13 not acceptable. You know, we watch out for it, but 14 I think that -- I can't recall an occasion, certainly in 15 the last four years, where that's gone on. 16 Q. Okay. Before we look at the specific examples in 17 paragraph 9, can I ask you this general question: do 18 you, as picture editor, apply any different standard in 19 relation to the publication of photographs as between 20 the print edition of the newspaper and the Internet 21 edition? 22 A. Yeah, I mean, I am effectively the picture editor for 23 the online edition. I have a person on my desk who 24 specifically deals with the online edition and he comes 25 to me all the time to ask me advice on whether -- can we</p> <p style="text-align: center;">Page 106</p>	<p>1 Q. In your own words, why did you do that? 2 A. Following the announcement of the birth, we sent 3 a freelance photographer down to the home. He was 4 there, I think, from about midday on that day. I think 5 when he arrived he may have seen -- well, I know he saw 6 Ms Hong on the public street and took a picture of her. 7 She wasn't with the baby; she was just simply walking 8 down the street. 9 Do you want me to carry on? 10 Q. Yes. 11 A. We also sent -- I think, from memory, it's the same 12 photographer back the following day, on the Tuesday. 13 I think he may have stayed probably most of the day 14 until he had a conversation with Mr Grant where I think 15 Mr Grant was asking him what he was doing here. By that 16 time, he'd already taken Mr Grant's picture. He said he 17 was there to cover the story and I think Mr Grant left 18 and -- more or less at that time he left or left the 19 immediate vicinity. 20 I think at that point, probably twenty minutes 21 later, half an hour later while he was in his car away 22 from the address, we received the letter from the PCC 23 asking us to leave and we did so straight away and 24 haven't been back since. 25 Q. Yes. The request from the PCC was on the grounds of</p> <p style="text-align: center;">Page 108</p>

<p>1 privacy, wasn't it?</p> <p>2 A. I believe it was. But I haven't -- I have to point out</p> <p>3 here, by the way -- I meant to say this at the</p> <p>4 beginning -- this information -- I was on annual leave</p> <p>5 when this happened.</p> <p>6 Q. Okay.</p> <p>7 A. But this is all information I've obtained from my deputy</p> <p>8 who was in charge that week, so --</p> <p>9 Q. Yes. I think the obvious question is: why wait until</p> <p>10 you receive a privacy request from the PCC?</p> <p>11 A. I think we left the before that. We left the area</p> <p>12 before that.</p> <p>13 Q. I think what your statement is telling us is that you</p> <p>14 got the privacy request, which had been channelled</p> <p>15 through the PCC.</p> <p>16 A. Yeah.</p> <p>17 Q. Your internal lawyer then passed that on and you then</p> <p>18 complied with the request?</p> <p>19 A. He did, yeah. I've since spoken to the photographer and</p> <p>20 he tells me that he was away from the area when the</p> <p>21 request was received. I mean, we're only talking half</p> <p>22 an hour or an hour, but I think once he'd had the</p> <p>23 conversation with Mr Grant and taken his picture, he had</p> <p>24 left. He did leave.</p> <p>25 Q. I appreciate that you were on leave at the time.</p> <p style="text-align: center;">Page 109</p>	<p>1 considerations. Would you accept that?</p> <p>2 A. I don't know. I think it's a difficult line we walk</p> <p>3 sometimes. I do, really.</p> <p>4 LORD JUSTICE LEVESON: I suppose it's unfair to ask how you</p> <p>5 would have walked it if you'd been there rather than on</p> <p>6 holiday?</p> <p>7 A. Pardon?</p> <p>8 LORD JUSTICE LEVESON: What decision would you have made if</p> <p>9 you'd been there rather than on holiday?</p> <p>10 A. I think I would probably have made the same decision.</p> <p>11 We didn't -- as I say, we left the area before we had</p> <p>12 the note from the PCC.</p> <p>13 MR JAY: Okay. There were some more photographs. You can</p> <p>14 skip the next paragraph, Mr Edwards, which deals with</p> <p>15 something else, but at the third paragraph on the page,</p> <p>16 you say:</p> <p>17 "We were offered another set of pictures of Ms Hong</p> <p>18 after the news broke of the birth. These had been taken</p> <p>19 some weeks before, on 21 September ..."</p> <p>20 So that's five days before the baby's birth,</p> <p>21 I think.</p> <p>22 "... by a freelance photographer. Along with</p> <p>23 several other papers, the Sun bought and published these</p> <p>24 images."</p> <p>25 Is that right?</p> <p style="text-align: center;">Page 111</p>
<p>1 A. Yeah.</p> <p>2 Q. Wasn't it obvious from the circumstances, though, that</p> <p>3 this was a private situation and there shouldn't have</p> <p>4 been a photographer there at all?</p> <p>5 A. It's a difficult call. As Gordon was saying, Mr Grant</p> <p>6 is of huge interest to our readers, and I think -- you</p> <p>7 know, he's an A list Hollywood actor who everyone's very</p> <p>8 interested in. I think -- I mean, we were there two</p> <p>9 days. I don't think we were -- I mean, he'll probably</p> <p>10 tell you different, but I think we were -- didn't -- we</p> <p>11 weren't causing that much grief. We weren't harassing</p> <p>12 him. We weren't harassing her. We were simply there in</p> <p>13 the hope of maybe getting a picture -- a happy picture</p> <p>14 of him and his girlfriend or him and the baby. I don't</p> <p>15 know. Celebrities have posed before with their babies</p> <p>16 on doorsteps or outside houses or outside wherever.</p> <p>17 Q. But you knew full well, from the circumstances and from</p> <p>18 what you knew of Mr Grant --</p> <p>19 A. Again, as I say, I'm not trying to look for excuses.</p> <p>20 I wasn't in that week. I mean, I'm not trying to use</p> <p>21 that as an excuse, but ...</p> <p>22 Q. Wasn't the overwhelming consideration the one you</p> <p>23 frankly told us about, that Mr Grant is of overwhelming</p> <p>24 interest to your readers, as you put it, an A list</p> <p>25 Hollywood celebrity? That trumped all other</p> <p style="text-align: center;">Page 110</p>	<p>1 A. Yeah.</p> <p>2 Q. Can you remember anything about those photographs?</p> <p>3 A. I don't think we bought them on 21 September. I think</p> <p>4 we may have bought them once with the news of the birth</p> <p>5 had come out.</p> <p>6 Q. Indeed, that's what you're saying here.</p> <p>7 A. Yeah, yeah. From memory, pictures taken in the street,</p> <p>8 I don't think there was any -- there was nothing bad as</p> <p>9 in regard -- there was no bad behaviour by the</p> <p>10 photographer, as far as I can see, and I'm sure that was</p> <p>11 all checked out at the time.</p> <p>12 Q. I think from the evidence we received, it's clear that</p> <p>13 one of the photographs -- and that may have been the one</p> <p>14 taken in January 2011, or it may have been taken</p> <p>15 in April, my recollection may not be right about this --</p> <p>16 was taken with a long lens. But it was certainly in</p> <p>17 a public place.</p> <p>18 A. It was in a public place.</p> <p>19 Q. But it might be said with a reasonable expectation of</p> <p>20 privacy. How do you assess that last factor: reasonable</p> <p>21 expectation of privacy?</p> <p>22 A. Well, in a private -- I mean, I think it's in the PCC</p> <p>23 code, isn't it? I mean, in a private place. They were</p> <p>24 on a public street. There were no visible signs of</p> <p>25 distress. I'm sure we checked it out at the time.</p> <p style="text-align: center;">Page 112</p>

<p>1 There doesn't seem to be a problem. There's pictures of 2 celebrities doing it all the time, I think. They're on 3 a public street. I don't think we have a problem there. 4 I mean, as I say, we always make these checks. If 5 we think there's -- if people are uncomfortable, then we 6 ask the question. 7 Q. Isn't there an inconsistency here, in that you've told 8 us in relation to someone else -- this is the singer 9 Lily Allen, who was heavily pregnant -- 10 A. Yeah. 11 Q. This is paragraph 5.1 of your statement. She was in 12 a public place. She was wearing a happy expression. 13 What's the difference between that situation and -- 14 A. Sorry, could you repeat that for me, please? 15 Q. Yes. You can refresh your memory about it. It's in 16 your statement under 5.1. Can you remember that? You 17 told us about it about 15 minutes ago. 18 A. Yeah, Lily Allen. 19 Q. The Lily Allen photographs. The woman is heavily 20 pregnant, she's shopping in central London, so it's 21 a public place. She appeared to be wearing a happy 22 expression but you called her agent and you decided not 23 to publish the photographs. 24 A. Yeah. 25 Q. But you didn't adopt -- it may be that you were on Page 113</p>	<p>1 holding hands with a German woman. I don't know if you 2 have any knowledge about that? 3 A. I know this is going to sound like I'm copping out but 4 this is all the same time, I think. But referring to 5 that picture, I think that was a miscaptioned image from 6 normally a very, very good agency. 7 Q. Okay. Then you deal with Dr McCann. I note the time. 8 I only have another five minutes or so. 9 LORD JUSTICE LEVESON: All right, carry on. 10 MR JAY: That should finish it. 11 This is towards the bottom of page 53352. You tell 12 us what happened here, Mr Edwards. You did photograph 13 the McCanns on their return from Portugal. Photographs 14 were provided by the Press Association after their 15 arrival at the airport, and you did continue to cover 16 the story in the days that followed, and the Sun was 17 part of the press and TV crews who were stationed on 18 public land at the exit to the housing development where 19 they lived. Then you say: 20 "From this vantage point, our photographer took 21 pictures of them leaving and arriving home by car." 22 Have you seen photographs where there are also 23 children in the car? 24 A. I have. 25 Q. Are you aware of the McCanns' evidence to this Inquiry Page 115</p>
<p>1 holiday at the time when this was being considered. You 2 didn't adopt a consistent approach, though, did you? 3 A. Well, she -- I think perhaps the fact that Lily Allen 4 was heavily pregnant would have been a major 5 consideration for us. 6 Q. You think that tipped the balance; is that right? 7 A. I think so, yeah. 8 Q. But why not, at the very least, telephone the agent of 9 Hugh Grant and find out whether he would be agreeable to 10 the publication of such a photograph? 11 A. Sorry, I've gone blank on that. Say that again? 12 Q. Why not, at the very least, telephone the agent of 13 Hugh Grant to ascertain whether he, his client, would be 14 agreeable to the publication of such a photograph? 15 A. I don't think we thought there was a problem with the 16 picture, to be honest with you. It was in a public 17 street. There were no visible signs of distress, like 18 I say. I don't think we felt any need to ring the 19 agent, to be honest. I think with Lily Allen -- the 20 other example -- Robin Gibb was a medical appointment. 21 Lily Allen was pregnant. I think we were trying to be 22 considerate in that event. 23 Q. There were certain other photographs of Hugh Grant which 24 the Inquiry was told about. One was allegedly -- it 25 wasn't born out by an examination of the photograph -- Page 114</p>	<p>1 that distress was caused to the children, not 2 necessarily by Sun photographers, but at least by -- 3 A. I've read that evidence, yes. 4 Q. Did you have any comment to make about that? 5 A. I do. You know, I'm a dad of a little girl -- when I 6 say a little girl, not so little now, but she would have 7 been seven at the time, and, you know, I felt tremendous 8 sympathy with the McCanns and their situation. You 9 know, looking back on it now, I don't think it was right 10 that Mrs McCann had to drive through that crowd of 11 photographers and TV crews, no. I'd like to talk to you 12 quickly about -- when they were in Portugal, the 13 relationship the Sun had with them in Portugal was 14 excellent. My photographer, Lee Thompson, got on very 15 well with them. We'd often arrange picture -- times to 16 take pictures. If we met them in the morning, we would 17 leave them alone for the rest of the day, for example. 18 Sometimes Lee would shoot the picture as the only 19 photographer and supply the other papers. And 20 looking -- please God this never happens again, but I do 21 think that if it -- if something similar does happen 22 again, I think we have to maybe limit the amount of 23 photographers to maybe one photographer and one TV crew 24 to cover it for everybody. 25 Q. I think from that answer you accept that certainly the Page 116</p>

<p>1 quantity of photographers and television cameras created 2 an oppressive atmosphere? 3 A. If I were going through that, I wouldn't be happy, no. 4 With children in the car, of course not. 5 Q. Was that assessment made at the time, though? 6 A. Probably not, no. I mean, as I say, I've thought about 7 it a lot this last weekend, knowing I was coming here 8 today, and we got it spot on in Portugal, in my view, 9 but we may have not got it -- we may not have been so 10 good when it came back to Leicestershire, no. 11 Q. Okay. Thank you for that, and we can read the rest of 12 your evidence there and indeed in relation to JK Rowling 13 and Charlotte Church. 14 I need to come back, though, since I missed a point, 15 or at least didn't make it clear enough, in relation to 16 Ms Hong, Mr Edwards. Some of the photographs which you 17 were offered after the news broke of the birth -- and we 18 know that the birth was on 26 September of last year -- 19 were photographs which had been taken some considerable 20 time before, for example, in January 2011. 21 A. That would be the picture of the two of them together, 22 yeah. 23 Q. That's right. But you also say in the last paragraph of 24 this part of your statement that some of the 25 photographs, on the other hand, had been taken on</p> <p style="text-align: center;">Page 117</p>	<p>1 Q. Okay. You say "perhaps" you should have checked; it 2 would have been obvious from the photograph. 3 A. Yeah. 4 MR JAY: Thank you very much. 5 LORD JUSTICE LEVESON: Thank you very much indeed. We'll 6 break now until 2.05 pm. Thank you. 7 (1.08 pm) 8 (The luncheon adjournment) 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 119</p>
<p>1 21 September 2011 by a freelance photographer. 2 A. Mm. 3 Q. Doing the obvious work which one can do in relation to 4 the chronology, that was five days before the birth. 5 A. Yeah. 6 Q. So I think the question I put to you in relation to the 7 singer Lily Allen, heavily pregnant, and the lack of 8 consistency which the Sun showed, was valid, wasn't it, 9 in relation to those particular photographs? Do you 10 follow me? 11 A. No, I'm not sure I do, sorry. I understand the 12 Lily Allen pictures, yes. 13 Q. Some of the photographs which you were offered -- 14 A. On 21 September, yeah. They were taken then. 15 Q. -- were taken on 21 September -- 16 A. Yeah. 17 Q. -- which was five days before the birth of the child. 18 A. Yeah. 19 Q. So Ms Hong, by definition, was heavily pregnant. 20 A. Yeah. 21 Q. The question is: what's the difference between her case 22 and the case of Lily Allen, who was also heavily 23 pregnant? Both ladies were heavily pregnant. 24 A. There's no difference. I mean, perhaps we should have 25 checked.</p> <p style="text-align: center;">Page 118</p>	

A					B	
able 8:22 26:14 51:3 64:4 79:25 87:17	105:17,22 106:3,25	allows 9:2	appears 25:6 63:5	44:24	b 64:20	112:9
abroad 104:21	advisedly 67:2	all-important 9:10	appellation 7:16	ascertained 54:14	babies 110:15	belief 6:18 44:19
absolute 40:4,5	affect 19:4 20:19	alongside 57:18	appended 95:4	aside 21:6	baby 99:25	believe 24:17 38:8 51:22 54:1,18 55:9 60:21 84:18 86:16 91:9 109:2
absolutely 33:24 61:22 97:1 102:13	AFP 97:13	Aloud 68:10	applaud 9:25	asked 3:6 27:9 29:11,16 36:16 36:24 41:25 44:9 50:12 72:1,16 78:7 94:9 107:13,17	107:17 108:7 110:14	best 9:18 52:5 71:16
abuse 15:1 98:1	afraid 48:11	alteration 106:8	apply 78:5 98:6 106:18	asking 20:17 51:12 56:15 75:14 101:20 103:6,7 105:24 108:15,23	baby's 111:20	better 17:25 28:22 40:1 45:5,18 52:7
abused 80:23	afternoon 46:18 83:3	altogether 20:9	appointment 101:1 114:20	aspect 15:11	back 1:11 25:5 39:4 41:24 59:7 60:14 65:14 68:21 78:16 83:10,16 85:17 90:16 101:5 102:19 108:12,24 116:9 117:10 117:14	beyond 24:18
acceded 32:19	age 86:22	Amendment 13:13	appreciate 78:12 109:25	assault 53:8	backbench 65:21	biff 15:6
accept 31:11,11 40:11,11,20 93:21 111:1 116:25	agencies 96:14 96:25 97:21 98:13,13,14,20 98:21 101:17 103:3	American 13:13	approach 2:11 4:11 13:11,13 13:13 19:4 22:20 75:17 79:11 114:2	assert 20:1	background 4:17 94:7	big 19:9 61:8 84:22
acceptable 106:13	agency 65:9 97:5 97:11 99:10,11 99:23 101:19 102:14 115:6	amicable 7:3	appropriate 16:11 17:17 38:7,8 39:2 40:9 56:12	assertion 20:3	bad 49:7 112:8,9	bigger 49:1
accepts 96:16	agent 54:8 64:4,8 65:14 66:24 72:12,17 92:10 92:17 93:6 100:8 105:24 113:22 114:8 114:12,19	amidst 98:22	approve 55:12	assess 112:20	bag 83:22	bill 43:14
Accident 67:5	agents 52:12 86:10 92:12,15 92:24	amount 17:8 20:14 50:5 116:22	approximately 102:16 103:7	assessing 48:5	balance 10:4 58:4 67:13 79:5 114:6	billion 89:10,21
account 5:12 8:18 61:20	agitated 7:8	analysis 42:8	April 112:15	assessment 78:21 85:4 117:5	balancing 49:15 49:18 53:17 60:18 65:12 90:4,8	binary 3:2
accountable 59:12	ago 14:14,17 26:22 27:23 29:3,25 30:2 113:17	analysis 42:8	arbitrary 2:19	assets 15:12	band 58:11,16 58:24 59:7 60:3,17	Birmingham 24:24 25:11
accounts 96:7	agents 52:12 86:10 92:12,15 92:24	anecdote 34:14	arc 12:18	assistance 3:6,21 5:15 35:15	base 76:12	birth 108:2 111:18,20 112:4 117:17 117:18 118:4 118:17
accuracy 41:10 42:5 43:14 91:17	agreed 14:20 32:20,21 58:24 89:14	Anglesey 89:12 89:17	area 18:12 19:13 35:23 40:7 53:19 55:20 79:1 95:14 109:11,20 111:11	assistant 95:12	base 76:12	bits 30:4,16
accurate 41:14 41:22	agreed 14:20 32:20,21 58:24 89:14	animals 35:21	areas 1:21 9:22 52:8	associated 97:13 98:13	base 76:12	bit 25:16 30:25 33:20 45:25 70:25 81:16 95:9 98:1 105:11 107:5,8
achieving 49:12	agreed 14:20 32:20,21 58:24 89:14	Anne 23:17 29:14 30:3	arguable 2:5	Association 40:25 95:15 97:15 115:14	base 76:12	bits 30:4,16
acrimonious 58:12	agreed 14:20 32:20,21 58:24 89:14	announced 59:7	argue 55:19 71:2	astonished 34:3	basic 17:12	bizarre 23:11 38:13 47:6,10 47:12,14,15 48:9 62:23 63:2 64:14 65:5 68:7 71:8 71:10
act 49:15 53:17 58:5,6 60:18 65:12 79:21 90:8	agreed 14:20 32:20,21 58:24 89:14	announcement 108:2	argued 2:1	astonishing 31:1	basically 12:10 13:16 19:21 23:1 33:17 40:17 74:15 79:21	blackmailed 32:17
acted 56:1 59:21	agreed 14:20 32:20,21 58:24 89:14	annual 109:4	argument 53:22 58:19 65:23 66:17 67:8 86:22 90:2	atkins 46:20 67:25 68:5 71:7	basis 21:9 37:17 39:23 45:17,24 49:16 55:14	Blair's 16:18,18
action 22:6	agreed 14:20 32:20,21 58:24 89:14	annual 109:4	arisen 102:16	atmosphere 14:3 19:10,11 75:15 117:2	basic 17:12	blank 114:11
activities 81:6	agreed 14:20 32:20,21 58:24 89:14	anonymity 57:12	arises 60:24	attack 9:17	basically 12:10 13:16 19:21 23:1 33:17 40:17 74:15 79:21	blew 34:25
activity 80:5 90:12	agreed 14:20 32:20,21 58:24 89:14	anonymous 1:25 50:22	arms 92:2	attempt 37:8 77:16	battle 40:19	blog 6:12 8:15
actor 110:7	agreed 14:20 32:20,21 58:24 89:14	answer 7:23 8:25 13:4 16:6 20:9 26:13 28:23 29:18 30:19 45:12,18 55:23 58:7 92:18 97:11 107:2,3 116:25	arose 76:11	attempts 37:8 77:16	bear 84:5	board 59:18
actors 66:18	agreed 14:20 32:20,21 58:24 89:14	answering 28:4,5	arrange 116:15	attribution 6:18	bearing 8:20 57:21	body 35:17
actual 31:9 88:6	agreed 14:20 32:20,21 58:24 89:14	anticipate 3:12 5:13,22	arranged 68:5 83:2,4	August 79:13	beat 37:8 76:24	bonuses 61:25
add 9:16	agreed 14:20 32:20,21 58:24 89:14	anti-establish... 16:2	arrangement 104:25 105:9 105:23	authorised 50:11	beauty 52:6	book 70:15
added 78:24	agreed 14:20 32:20,21 58:24 89:14	anti-paparazzi 104:1	arrived 108:5	availability 2:8	beer 86:22	books 68:11
address 8:1 47:19 63:3,4 108:22	agreed 14:20 32:20,21 58:24 89:14	anybody 4:3 24:14,16 27:22 27:23 30:6 37:20 81:11 97:2	arriving 115:21	available 8:12 46:9	began 95:12	born 107:18 114:25
addressed 1:18 3:4,8 7:18,19 57:21	agreed 14:20 32:20,21 58:24 89:14	anything's 83:13	article 8:15	average 64:11 96:19	begging 26:15,20	borne 44:19
adduced 8:1	agreed 14:20 32:20,21 58:24 89:14	anyway 10:22 14:23 18:6 29:21 36:10 45:16	articles 62:1	avoid 5:21 39:4 103:20	beginning 25:5 38:2 109:4	boss 99:10 102:14
adequate 86:4	agreed 14:20 32:20,21 58:24 89:14	AP 95:15 97:18	articulate 28:19 55:25	awards 91:4 94:11	behalf 1:13 22:7	bosses 99:12
adhere 7:21 76:2	agreed 14:20 32:20,21 58:24 89:14	Appeal 13:7 39:21 41:4	arts 80:10,17	aware 9:7 21:7 27:14 76:6 115:25	behave 101:22	bother 92:13
adjourment 119:8	agreed 14:20 32:20,21 58:24 89:14	appear 7:10 32:19 55:18 101:9	ascertain 114:13		behaved 99:15	bothered 16:9
adopt 113:25 114:2	agreed 14:20 32:20,21 58:24 89:14	appeared 32:25 60:11 66:10 70:8 87:3 113:21	ascertainable 39:10 41:9,14		behaving 54:23 55:1,11 56:6	bothering 77:18
adopted 6:24 90:17	agreed 14:20 32:20,21 58:24 89:14				behaviour 84:22	bottom 18:13 63:3 69:22
advance 3:19 77:6	agreed 14:20 32:20,21 58:24 89:14					
advanced 6:3	agreed 14:20 32:20,21 58:24 89:14					
advantage 24:11	agreed 14:20 32:20,21 58:24 89:14					
advice 48:11,14	agreed 14:20 32:20,21 58:24 89:14					

72:7 103:12 115:11 bought 111:23 112:3,4 bound 91:20 box 39:12 40:15 boys 91:3 bravely 57:12 breach 52:21 86:6 breaches 19:2 break 73:1 119:6 breakfast 24:15 breaks 96:22 breath 65:19 briefed 79:10 briefing 79:14,23 briefings 81:14 briefly 43:21 Bristol 96:4 British 87:21 broadcast 68:20 broadcasting 11:12 broadly 8:11 43:14 broke 111:18 117:17 broken 83:20,21 Brooks 22:18 brought 5:25 39:24 59:4 Brown 35:1,8 Brown's 34:25 Brudenell 8:9 buck 66:3 bucket 37:2,17 Buckingham 74:13,18 77:3 77:6 78:20 93:1 build 74:12 building 62:2 bullish 13:11 14:9 bundle 23:18 bundles 46:6,9 46:11 49:22 buried 31:4 bus 84:17 business 10:1 20:17,18 21:21 38:14 62:17 75:17 busy 65:2 butler 44:6 45:5 45:10,10,14,18 45:21 butlers 89:24 butler's 45:17 byline 72:19,20	37:12 42:23 44:17 48:17 59:20 64:17 65:8,14 69:7 77:3,21 82:22 83:19 103:15 105:15 110:5 called 24:21 35:1 37:5,12 68:23 68:24 70:10 113:22 calling 37:15 calls 19:14 26:25 45:8 64:17 68:6,19,21,22 69:1 82:8 91:15 Cambridge 88:25 97:8 camera 83:22 97:6 cameras 88:5 117:1 Camillagate 80:25 campaign 25:12 29:7 30:8 capacity 23:4 car 38:15,16 66:22 83:20,21 89:3 108:21 115:21,23 117:4 care 4:20 career 24:17 57:11 62:3 93:2 95:13 Caribbean 82:25 83:11 carries 29:15 104:1 carry 10:22 18:10 29:13 108:9 115:9 carrying 90:12 cart 20:25 case 8:5,7 31:23 38:23 39:6,13 39:23,25 40:14 40:18 41:4,6 42:8,13 56:10 56:18,20 58:10 58:17 59:3,15 59:21 63:9 66:5 72:18 85:5 90:11 105:12,18,20 118:21,22 cases 21:6 63:21 cash 49:20 50:1 50:4,7,7 63:6 88:18 cast 15:3 castles 88:11 catacomb 37:14 category 56:10 98:1,7	caught 106:11 caused 116:1 causing 110:11 caution 22:22 cautious 13:20 13:21,24,25 22:20 caveat 91:5 celebrities 48:23 49:3 58:1 90:25 91:12 101:9,13 103:13 110:15 113:2 celebrity 51:7 52:11,24 54:8 55:8,11 56:25 57:22 64:8 67:12 86:9 92:12,14,24 93:5 104:5 105:2,18,24 110:25 cent 37:10 41:2 41:22 64:8,9 77:11,23 82:5 85:23,25 87:13 87:13 central 99:24 113:20 centre 62:13,18 certain 9:7 10:4 52:8 54:25 56:5 101:9 103:13,19 104:2,23 114:23 certainly 5:22 13:19 30:20 75:11 80:1,13 84:21 102:25 106:14 112:16 116:25 certainty 13:5,6 38:3 cetera 44:25 45:1 104:22 change 14:5,7,7 22:18 35:18 76:4,6 changed 13:2,19 22:13,17 75:4 75:21 88:18 changes 49:20 changing 13:21 28:20,21 channel 11:13 44:3 channelled 109:14 character 16:1 characterisation 7:21 characterised 52:14 charge 109:8 charity 25:1,2	30:8 32:1,18 32:22 Charlotte 72:6 117:13 chased 85:10,19 85:20 chasing 87:18 chat 46:25 cheaply 2:19 check 52:4 54:7 63:20 66:23,23 68:2 77:10 82:8 83:13 85:13 99:18 102:2,19 checked 64:16 69:4 70:11,16 112:11,25 118:25 119:1 checking 50:15 52:17 69:3 81:18 82:16 checks 113:4 cheeky 70:24 cheque 20:20 cheques 21:2 chief 81:14 84:12 child 23:22 31:5 107:18 118:17 children 99:8 115:23 116:1 117:4 chin 15:5 choice 3:2 choices 2:13 chose 24:4 26:7 67:4 Chris 46:20 67:25 Christmas 1:9 5:12 40:24 91:24 chronological 107:20 chronologically 10:9 chronology 118:4 chuck 12:19 Church 72:6 117:13 circle 52:12 circulation 31:18 circumstance 30:1 101:15 102:16 105:15 circumstances 4:12 24:14 29:12 36:10,15 58:14 59:2,9 63:17 90:10 95:24 97:19 110:2,17 circumventing 16:20 claimed 83:15 claiming 82:23	Clarence 74:8,14 74:18,24 77:4 77:6 78:7,20 83:11 85:11 87:1,21 92:25 93:10 clarify 47:7 53:25 clause 2:13 clear 6:3 8:24 9:5,25 11:4,10 12:6 20:9 50:18 54:2,25 58:15,17 59:24 60:6 63:6 64:2 76:1,2 112:12 117:15 clearly 8:16 53:3 79:13 cleverest 42:11 client 114:13 climate 29:8 close 6:16 19:15 63:23 closely 24:13 45:6 cloud 59:3,8 club 86:19 88:8 92:1 code 43:13 112:23 coffin 23:22 coincidence 71:7 Coles 72:15 colleague 24:21 91:16 93:15 colleagues 20:24 24:23 48:9,11 51:22 52:7 100:1 101:2 collusive 3:22 column 47:7,10 47:12,14 50:24 53:16 63:3 64:6,11 71:10 columnist 11:14 combination 61:6 come 3:14,17 19:15 20:15 42:15 49:18 51:5,10,12 55:22 74:16 76:7 78:11,16 79:20 80:19 85:17 93:13 94:10 95:15 97:24 98:17 102:9,10 104:7 112:5 117:14 comes 12:13 106:24 comfortable 10:16 46:3 63:16 94:21 99:15 100:3,5 coming 97:12	117:7 comment 9:3 39:3 41:24 54:6 65:17 91:11 116:4 commentary 9:2 commenting 30:13 comments 9:11 38:22 commercial 11:12 14:3 15:6 22:8 35:21 36:7 88:1 96:25 commission 18:20 23:3 35:20 36:1 96:9 commit 42:14 communications 87:1 company 35:9 45:7 49:6 company-wide 84:14 compared 38:4 92:25 compensation 12:9 competition 3:5 complain 86:14 complaint 9:22 101:24 102:6 complaints 23:1 23:3,11 35:19 36:1 completely 19:20 20:2 40:25 42:13,24 88:10 97:23 compliance 4:14 complied 109:18 compulsion 4:20 concept 53:14 concern 43:12 concerned 2:5,7 2:12,23 9:8 38:20,22 39:8 61:2 concerning 4:2 7:5 concerns 1:10,23 3:23 4:6 5:10 39:10 41:6 82:12 99:7 101:20 conclusion 93:14 conduct 9:15 16:12 conducted 5:14 conference 47:22 48:4,7,20 59:6 confirm 34:14 confirmed 37:24 65:16 confused 83:9	107:5,9 connected 29:4 39:11,12 40:24 conscience 2:13 consent 30:21 Conservative 33:23 consider 3:9 8:17 9:20 43:13 61:8,11 70:9 considerable 9:22 117:19 considerate 114:22 consideration 7:24 54:12,13 87:5 96:20 99:17 110:22 114:5 considerations 61:8 111:1 considered 3:10 4:17 5:7 9:18 114:1 considering 25:4 29:4 consistency 118:8 consistent 51:13 114:2 constant 62:7 96:17 97:12 constitution 13:14 35:16 constraint 36:9 constraints 4:21 40:12 41:10 contact 5:8 21:21 21:25 50:12 51:6,10 64:7 76:19,21 contacted 83:11 105:5 contacts 52:6,8 52:10 63:10 69:13 contempt 18:1,7 18:7 content 14:15 105:8 contentious 4:17 context 10:2 12:7 50:18 53:16 68:18 100:19 continue 4:11 34:1 115:15 continued 22:18 continues 35:7 continuing 78:19 contracts 98:11 contractual 97:16 contradict 24:2 90:22 contradictory 56:12 contradicts 56:2
C cabinet 16:20 33:12 Calder 10:13,17 call 2:22 5:2	cast 15:3 castles 88:11 catacomb 37:14 category 56:10 98:1,7	charge 109:8 charity 25:1,2	claiming 82:23	coming 97:12	confused 83:9	contradicts 56:2

contribution 35:7	48:14 108:17 115:15 116:24	day's 9:4	87:1 109:7	63:11,21 70:13 107:11	70:17	effect 6:12 8:12 22:9 32:16
control 103:1,2	coverage 9:1,6,7	day-to-day 28:16	describe 97:19	director 36:4,13 87:1	dry 19:6	36:12 47:12 105:13
conversation 24:5,18 25:7,9 27:22,23,24 30:10 40:15 59:22 61:12 108:14 109:23	covered 20:25 84:14	dead 23:22	described 1:8 44:16 74:2	disagree 68:17	Duchess 88:24 97:8	effectively 98:9 98:18 106:22
conversations 29:25 31:6	covering 9:6	deadline 78:14	desire 33:25 81:25	disclose 35:25	Dudman 76:16 76:23	eight 30:2 33:13
convictions 79:17	crank 68:19 69:1	deadlines 61:2 61:10	desk 37:18 68:7 68:25 79:10	discourteous 5:3 37:3	due 3:11	either 6:5 9:9 24:1 34:22
Coogan 92:9,11 92:16	crash 38:15,16 66:22	deal 6:10 10:9 20:6 23:2 24:3 47:19 49:20 51:25 52:10 53:13,14 58:10 59:12 67:17 74:6 76:10 81:17 84:5 88:8 93:7,7 106:7 107:13 115:7	desperately 91:17	discover 16:25 36:8	Duncan 73:3,6 73:10 97:7	35:16 39:20,25 40:13 62:8 64:3,7 77:3 96:15 98:7
copping 115:3	create 62:7	dealt 51:7 53:13 66:4 88:16 92:17	destroy 35:8,9	discovered 16:14 16:17,19	duty 66:20 67:11	elaborate 13:22
copy 94:25	created 29:7 117:1	deals 46:19 67:24 106:24 111:14	destroying 44:14	discuss 7:6 32:14 46:25 48:9,10 49:13 50:17 57:18	dying 39:14	elaboration 5:6
copyright 52:21	credibility 78:25	dealing 18:12 40:7 61:24 75:25 97:21 101:17	detail 1:24 5:19 15:20 25:8 31:1,2 59:1 91:25	discussed 48:6,8 66:5 81:7	<hr/> E <hr/>	election 34:19
core 1:14,19 3:9 3:18 5:16	critical 9:10 10:2	death 25:1 32:15	deaths 29:3,4,7	discussing 7:17 70:5,6 76:25	earlier 30:24 33:1 90:16 95:10 101:16	electronic 95:13
corporate 11:17	criticism 2:8 9:8 9:23	debacle 36:25	debatable 31:19	distress 112:25 114:17 116:1	early 22:24 33:21 78:15 84:25 93:2	elephant 87:15
correct 11:15 13:8 31:16 33:23 40:21 41:2 46:14,15 46:20,21 47:13 47:17 49:1 51:15 52:16,23 53:12 54:10,17 54:18 63:1,2,9 67:23 68:16 71:21 73:20,21 74:1 76:14,18 81:23 95:2,3 96:16 106:5	crossed 49:7	December 95:1	December 95:1	document 5:23	earth 31:10	Elton 12:7,9 14:11,19 15:25 42:8
correctly 50:20 52:14,21 90:14	crowd 116:10	decide 11:23 58:13	decided 34:18 100:7 101:3 113:22	documentary 44:3,16	earth-shattering 68:8	email 39:12 40:2 40:15 63:3 79:25 80:1 105:12
correspondence 104:9	culminated 12:8	decide 11:23 58:13	decided 34:18 100:7 101:3 113:22	doing 14:4 21:20 25:15 36:8 106:12 108:15 113:2 118:3	earth 31:10	emails 40:23 69:2 104:13
correspondent 73:23 74:10	culturally 75:12	death 25:1 32:15	death 25:1 32:15	distinct 24:11	earth-shattering 68:8	emerge 3:4
corroborate 52:6 69:15	culture 1:25 2:6 6:6 8:16 22:13 75:4,19	debacle 36:25	debacle 36:25	distinction 56:7	earlier 30:24 33:1 90:16 95:10 101:16	emerged 16:21 24:23
corroborated 52:3 53:9	currently 73:19	debatably 31:19	debatably 31:19	distress 112:25 114:17 116:1	early 22:24 33:21 78:15 84:25 93:2	Emergency 67:5
corroboration 52:1 63:20 64:3	curve 59:19	December 95:1	December 95:1	distributing 5:16	earth 31:10	emerging 3:15
cot 25:1 29:3,4,7 32:15	cutlery 69:19 70:20,25	decide 11:23 58:13	decide 11:23 58:13	document 5:23	earth-shattering 68:8	emotionally 32:17
countered 7:9	cutting 9:5	decided 34:18 100:7 101:3 113:22	decided 34:18 100:7 101:3 113:22	documentary 44:3,16	earth-shattering 68:8	employment 76:3
country 66:18 67:11 97:14	<hr/> D <hr/>	decision 32:1 39:18 41:11 47:24 48:3 60:21 61:13 65:22 66:10 111:8,10	decision 32:1 39:18 41:11 47:24 48:3 60:21 61:13 65:22 66:10 111:8,10	domain 6:1 40:10 61:3	earth-shattering 68:8	empty 89:2
couple 59:5	da 24:7,7,7	defence 9:18 73:22	defence 9:18 73:22	domestic 57:13	earth-shattering 68:8	encapsulates 11:25
course 2:3 6:24 9:19 12:23 15:2 21:6 34:25 43:2 44:23,25 76:3 76:12 79:12 117:4	dad 116:5	deference 90:24 91:7	deference 90:24 91:7	Dominic 22:19	earth-shattering 68:8	encourage 49:9 104:16,23
court 13:7 19:7 39:1,20,20 40:5 41:4 45:13 79:20 84:1,2	daily 11:14 47:21 48:3 49:15 77:19	defined 17:13	defined 17:13	Donlan 22:24	earth-shattering 68:8	encouraged 63:1
cover 45:24	dated 46:13 95:1	definitely 22:15 22:22	definitely 22:15 22:22	door 42:9 79:22 106:12	earth-shattering 68:8	ended 68:15 86:17
	David 17:14 18:17	definition 2:16 16:8 118:19	definition 2:16 16:8 118:19	doorstep 110:16 dorse 39:7	earth-shattering 68:8	endorse 34:18 43:4
	day 3:24 14:2 23:12 24:20,22 30:7 31:24 37:7 42:23 45:9 47:23 51:15 53:20 64:12 78:15 83:24 96:19 98:23 100:2 108:4,12,13 116:17	deliberately 70:7 93:4	deliberately 70:7 93:4	double 64:24	earth-shattering 68:8	endorsement 34:25
	days 15:14 32:4 65:15 110:9 111:20 115:16 118:4,17	deliver 62:8,11 62:15	deliver 62:8,11 62:15	doubt 10:3 34:13 34:13 44:18 48:10 67:21	earth-shattering 68:8	ends 29:10
		denial 22:3	denial 22:3	Dowler 5:11 19:13 20:1	earth-shattering 68:8	enjoyed 17:11
		denied 32:18	denied 32:18	downplay 79:3 89:25	earth-shattering 68:8	enobled 88:24
		department 67:5 104:8,13 105:5 105:13,18,20	department 67:5 104:8,13 105:5 105:13,18,20	down-to-earth 89:25	earth-shattering 68:8	ensure 1:22 5:24 38:9 43:12
		depending 17:3 20:13	depending 17:3 20:13	Dr 115:7	earth-shattering 68:8	entail 50:19
		deputy 32:4,7	deputy 32:4,7	dream 36:14	earth-shattering 68:8	entails 48:24
				drill 42:21	earth-shattering 68:8	entered 89:20
				drive 104:22 116:10	earth-shattering 68:8	entering 61:3
				dropped 62:15 94:12	earth-shattering 68:8	entertainment 57:17,18
				drummed 51:16	earth-shattering 68:8	entire 10:3 26:14 39:2
				drunk 69:15,25	earth-shattering 68:8	entirely 17:17 38:7 40:20 43:4 66:14 67:7 70:9
					earth-shattering 68:8	entitled 38:21
					earth-shattering 68:8	environment

99:8,13	80:25 82:20,21	extent 38:7,11	favour 35:24	fit 43:14	107:23 108:3	46:4 52:17
equally 4:5 8:21	88:23 93:10	40:8	94:9	five 13:3 23:5	111:22 118:1	64:4 67:21
9:24	100:23 102:7	extra 62:4	fax 14:14,18	25:12 29:7	freelancers 96:8	71:4 77:7
equivalence 34:5	114:20 116:17	extreme 103:16	FC 62:21	30:9 78:14	96:10,24 98:7	78:12,15 81:18
equivalent 51:18	117:20	104:6	feature 64:23	96:1,3,7,11	French 53:10	82:15 88:23
ERM 36:25 37:5	examples 18:25	extremely 28:10	features 32:8,11	98:3 111:20	frequent 100:17	91:25 95:16
37:9	49:18 52:17	43:6	February 3:11	115:8 118:4,17	Friday 6:11	100:13,22
escaping 61:10	67:17,20 82:16	ex-directory	feel 15:18 16:2	fix 107:20	46:18	103:7,10
essential 4:16	84:4 87:19	21:16,22	17:16 20:25	flagged 83:12	friends 16:4 60:2	107:20
62:4	100:13,17,22	ex-girlfriend	55:2 60:14,15	Fleet 81:4 90:21	frisbee 94:7	given 4:21 7:25
establish 99:12	103:6,10	53:9	77:7 87:11	91:15	front 23:17 25:6	30:21 43:22
et 44:25 45:1	106:16 107:14	ex-husband	91:19 100:3	flunkies 89:23	26:15,16 35:1	47:10 65:13
104:22	excellent 116:14	27:13	103:7	flying 76:11	46:6 64:23	82:25 83:2
ethical 2:6 47:19	exceptions 82:11	eye 9:8 57:1	feelings 59:18	focus 9:23	66:19 73:11	101:11 105:17
48:5 76:10	exclusive 60:12		feels 42:7 44:10	focused 9:21	85:18 86:18	106:3
ethically 51:24	62:1 78:11	F	75:11	follow 102:6	89:21	giving 8:10 30:14
58:6	exclusively 91:4	face 22:6 25:2	fees 96:9	118:10	frustrations 70:4	38:15 48:24
ethics 11:19 16:7	exclusives 62:15	50:23	felt 11:22 15:23	followed 43:15	full 10:16 14:21	94:22
16:8,11 53:15	77:11	Facejacker	16:3 28:10	84:10 89:23	39:12 46:4	global 87:19
53:15 87:22	excuse 43:8	68:24	32:24,25 56:23	115:16	50:16 61:11	go 10:1 16:20
Etonian 83:8	90:16 110:21	fact 9:14 15:3	90:10 92:5	following 1:9,12	73:9 94:22	24:10,13 30:6
evening 44:8	excuses 110:19	25:15 27:13	114:18 116:7	4:1 30:7 31:24	110:17	43:9,16 44:18
84:18	executive 77:12	39:9 41:9,18	female 52:19	42:23 44:4,21	fundamental	45:10 48:4
event 59:23	81:15 84:13	41:18,19 44:24	fifth 2:17 6:8	76:16 81:17	62:2	54:15 67:5
101:25 114:22	executives 30:8	46:24 64:6	54:1	101:11 108:2	funds 32:14	74:17,24 79:15
events 31:12	31:25	67:12 69:15	figure 104:5	108:12	funeral 27:15,16	84:1,2 88:3
43:5	exercise 43:3	87:12 88:9	figures 103:13	follows 61:20	furios 35:1	89:11,14 94:3
everybody 31:11	exercising 2:13	100:5 114:3	file 10:18,19	fond 78:2	further 3:16 7:25	102:2,18 103:4
43:13 81:11	exhibit 46:19	factor 31:13 79:6	46:11 73:11	footballer 53:8	9:2,16,20 32:3	106:2
87:8 116:24	exist 21:7	112:20	94:24	forced 25:15	33:20 48:10	God 116:20
everyone's 110:7	exists 18:14	factors 78:18	filed 65:20	forgive 83:7	67:17 88:3	goes 2:4 41:24
evidence 1:6,9	21:23	79:4	files 73:11	84:19	103:10	64:13 89:22
1:25 2:3 3:11	exit 115:18	facts 11:22 14:7	fill 53:6	form 3:10 4:8	future 3:14	going 1:10 10:8
4:1,6,9,13,23	exonerated 7:7	38:6,9 39:2,5	film 103:15	8:22 9:18 21:4	35:16	11:5 18:2
4:24 5:4,10,24	expect 27:22	40:9 41:14	105:15	21:9		20:16 23:2,25
6:4 7:25 8:16	36:9 62:16	42:11 43:2	final 3:16,19	formal 4:14	G	25:5 29:21
9:13 10:5,24	expectation	99:12	14:21 72:5	10:24 73:16	gained 11:20	37:16,18 41:16
11:10 20:10	60:15 76:2	fail 35:23	93:9	95:5 105:1	game 55:21 58:1	41:17 45:20
22:11 23:16,23	86:23 112:19	failed 77:15	finally 3:3 8:2	formally 4:24	GCSE 34:4	46:9 49:18
25:18,20 27:11	112:21	failing 24:15	35:14 75:22	8:22 46:16	general 3:8 4:6	54:19 72:2
29:13 30:3,13	expected 27:1	failure 5:2	financial 36:8,11	former 10:10	6:19 15:18,21	80:4 81:6
32:3 38:3	74:12	fair 20:15 21:25	find 10:20 37:15	36:4 44:5	16:4 22:10	85:12 86:13
43:22 45:17	experience 44:20	27:5 29:13	41:15 43:5,24	84:12	23:25 26:25	88:10,14 93:20
46:16,20,25	48:13 75:8,10	55:21 58:1	70:4 73:12	formerly 10:8	34:19 35:15	94:10,12 98:3
49:22 52:22	92:25 93:2	64:21 74:3	79:25 91:13	forming 3:12	74:6 75:2,22	101:8 104:10
53:9 60:5	103:16 106:1	78:22,23 90:25	94:25 114:9	forms 4:16	82:9 92:21,22	115:3 117:3
67:25 71:19	experienced 99:5	107:6	findings 3:15	fortunately 67:1	106:17	good 19:13 36:20
72:5 73:16	experiences	fairly 65:24	fine 74:25	forward 4:7	generally 49:10	36:22 48:23
81:18,19 88:19	104:5	fall 83:23 98:8	fin 35:24,25	62:13,18 84:3	55:20 99:1	51:24 55:10
90:22 94:13	expert 2:8	fallout 14:11	finest 42:11	99:16	geniuses 33:16	62:21 68:4
95:5 101:11	explain 33:16	familiar 37:6	finish 115:10	found 1:16 2:25	gently 58:17	69:13 74:13,19
107:6 112:12	81:13 82:7	families 39:12	fire 94:12	83:16	Gerard 94:19,23	74:20,22 78:19
115:25 116:3	95:24	family 59:15,22	first 1:10,25	four 3:14 13:3	German 115:1	82:15 91:3
117:12	explained 30:16	60:6,9 74:8	10:10 11:16	47:5,23 49:22	getting 38:9	93:18 115:6
evidential 4:2	60:18	85:4 87:7	13:4,5,12	106:15	42:16,17 43:2	117:10
exactly 59:8 83:7	explaining 29:11	89:21 92:2	36:18 41:24	fourth 2:14 5:10	52:18 63:18	Gordon 45:23
83:23 86:8	explains 44:19	95:18	46:12 52:18	frank 7:3	75:20 110:13	46:1,5 91:16
87:10 107:7,8	explosion 39:4	famous 66:18	54:9,13 56:9	frankly 77:18	Gibb 100:24	110:5
examination	expose 54:19	67:10	58:11 61:23	87:20 90:20	114:20	Gordon's 100:7
114:25	56:24	fan 62:21	73:8,24 74:6	92:12 93:6	Gilfoyle 42:13	gossip 15:15
example 9:16	exposing 54:2	far 4:7 13:17	75:6 77:2 78:8	110:23	girl 89:20 116:5	80:12,15 81:5
15:25 30:19	express 56:2,20	15:23 20:22	79:6 82:16	fraud 45:11	116:6	governance 2:15
38:17,18 41:20	57:3	76:25 92:6	89:9 100:13	free 9:10,11	girlfriend 110:14	4:15 11:17
53:7 54:22	expression	112:10	107:16	13:14 53:23	Girls 68:10	government
59:15 61:15	113:12,22	fashion 99:4	Firth 7:5,9,21	58:4	gist 32:13	33:23
64:14,23 69:10	expressly 55:25	fateful 44:9	8:1,15,17	freelance 27:8	give 21:22 34:14	go-between
76:10 78:2	56:10,16	father 95:19	fish 39:8	85:1 98:9,19	35:15 38:17	74:11

Graham 76:23	handled 66:8 72:15	61:16 100:7	54:20,21	82:1	interested 15:14 40:14,17 110:8	69:5 70:11 79:19 81:18 87:16 88:15 97:24 106:7
Grant 65:3 66:2 66:7,16 108:14 108:15,17 109:23 110:5 110:18,23 114:9,13,23	hands 44:22 45:19 115:1	he'll 81:15 110:9	I	indicating 7:3	interesting 19:25 20:2 33:18 69:7	issues 2:15,20 3:6,9,13 4:2 12:3 14:21 16:9 36:2 47:20 57:14,15 57:19,20,21 61:2 69:23 77:1
Grant's 65:14 107:17 108:16	hands-on 15:9 15:13	Hibernian 62:21	idea 15:4 17:10 25:8 28:16 29:24,24 37:14 40:18 42:15	indictment 42:18	interests 54:16 67:19	
grateful 3:7 4:5 4:18 67:20	Hang 31:3	High 19:6 39:20	identified 43:4	individual 33:12 49:14 85:5 87:25	internal 25:21 109:17	
great 59:10,10 75:13 98:15 99:11 101:18	happen 28:17 36:10 38:18 59:10 81:3 84:15 101:21 116:21	highway 27:15	identity 32:12 50:19 51:2 81:21 82:3	individuals 54:5 67:19	International 24:9 36:6 84:13,14	
greater 8:22 90:23	happened 23:10 25:10 36:2 37:5 60:9 68:13,15 71:8 81:13 106:1 109:5 115:12	Hinton 84:12	ii 52:24	inevitable 91:2 inevitably 9:23 61:18 98:22	International's 79:11	
greatest 42:12	happens 40:19 51:9 80:11 116:20	historical 14:15 80:24	iii 53:7	influence 34:10 34:12 84:22	Internet 2:25 87:4,15,24 88:9 106:20	J
green 70:15	happiness 59:4	historically 80:24	ill 100:25	inform 3:16 104:8,9	interpreted 7:19	jail 16:22 45:9 45:11,15
grey 53:19 55:20	happy 58:25 59:17 85:7 100:4,9 102:2 102:18 103:4 110:13 113:12 113:21 117:3	history 37:7	illustrations 67:22	informal 11:6 104:25 105:4,4 105:23	interview 57:13	January 1:1 73:20 112:14 117:20
grief 58:21 59:20 110:11	harassing 110:11 110:12	hits 59:14	illustrative 82:15	information 20:19 50:9,15 51:11,12 69:2 109:4,7	interviewed 57:11	Jay 6:9,10 7:1 10:7,14,15 18:10 20:5 28:24 31:13 37:24 45:22 46:2,3 55:22 61:14 68:4 70:21,22 71:14 72:1,21 73:3,7 73:8 75:14,22 88:14 92:14 94:13,16,20,21 97:24 105:7,11 111:13 115:10 119:4
grounds 93:19 94:6 100:18 108:25	harassment 85:3 100:19 102:8 103:17	hold 3:18 6:19 8:5 22:1 34:1 83:9	image 115:5	informed 69:6	intimately 44:7	JK 117:12
guaranteed 96:11	hard 13:9 38:5 41:1,21,21	holds 62:19	images 96:20 111:24	injunction 104:1	introduced 6:15 49:25	job 54:7 57:16 62:4,9,15
guarantees 13:14	Harding 69:8,10	holding 115:1	imagine 81:1	injured 69:24	intrusion 58:2,18 58:20	John 12:8,9 14:11 15:25 36:19,23 42:8 72:15 94:17,19 94:23
Guardian 1:13 5:13,18,22 16:23 17:15 18:15,23 19:9 19:16,20 20:1 35:22	Harry 78:2 86:16 88:7 93:15	holiday 82:24 111:6,9 114:1	immediate 108:19	injuring 69:17	intrusive 101:15	John's 14:19
guess 97:5	harassment 85:3 100:19 102:8 103:17	Hollywood 110:7 110:25	immediately 4:18 44:21 82:25	inquiry 3:22,25 4:25 5:6,8,25 6:7,17,21 7:10 8:1,9,10,12 9:1 9:6,9,11,21,23 10:25 11:4 16:16,21 17:22 23:23 24:2 25:20 26:24 29:14 35:16 39:13 43:22 73:17 95:5 101:12 114:24 115:25	invasion 85:3	joined 73:24 95:11
guide 91:11	hard 13:9 38:5 41:1,21,21	Holyrod 94:5	impetuous 34:8	inquest 69:24	invested 71:7	joking 100:9
guidelines 76:3	harassment 85:3 100:19 102:8 103:17	home 6:5 89:3 107:23 108:3 115:21	impact 2:14 31:7 31:15	injured 69:24	investigate 66:20 21:12,14	journalism 13:5 13:9,12 16:13 17:9 38:3,13 41:19 62:3 75:18
guilt 29:8	hard 13:9 38:5 41:1,21,21	honest 43:11 52:4 76:24 94:4 114:16,19	implications 61:11	injury 69:17	investing 37:8	journalist 34:4 43:1
guilty 83:25	hard 13:9 38:5 41:1,21,21	hope 10:18 46:10 84:19 110:13	importance 8:22 10:2 34:7	injury 69:17	investment 22:7	journalists 2:12 38:8 41:16 42:19 80:12,23
guise 16:16	hard 13:9 38:5 41:1,21,21	hope 10:18 46:10 84:19 110:13	important 15:11 35:18 48:22 49:4 62:1 66:12 77:22 79:1	injury 69:17	investor 45:7	judge 39:25
guy 17:15 42:13 68:13 69:8,12 70:16 83:3,15 83:18 88:8 94:7	hard 13:9 38:5 41:1,21,21	hope 10:18 46:10 84:19 110:13	impulse 81:9	injury 69:17	invite 25:18 100:14	judgment 13:24 39:14 91:15
guys 83:24 93:7	hard 13:9 38:5 41:1,21,21	hour 108:21 109:22,22	impress 69:12	injury 69:17	invited 24:24 25:11 74:23	judgments 41:4
H	hard 13:9 38:5 41:1,21,21	hourly 26:24,25	improve 28:14 49:3	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	judicial 2:2
habits 68:10	hard 13:9 38:5 41:1,21,21	hours 27:16	incentives 61:24	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	juggling 69:17 69:19 70:20,25
hacked 16:19	hard 13:9 38:5 41:1,21,21	house 39:1 69:11 74:8,14,19,24 77:4,6 78:7,20 83:11 85:11 87:1,22 92:25 93:10	incidence 69:18	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	jumped 85:18
hacking 5:11 16:16 17:16 36:3 71:15,18 71:19 72:2 75:23 79:9,15 79:19 80:16	hard 13:9 38:5 41:1,21,21	housekeeping 1:5,8	incident 8:19 66:21,25 68:13 86:15	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	justice 1:6 6:24 8:14 10:12
hairdryer 62:14	hard 13:9 38:5 41:1,21,21	houses 110:16	include 20:21 43:14 80:8,9	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	
half 86:1 108:21 109:21	hard 13:9 38:5 41:1,21,21	housing 115:18	included 33:25	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	
hand 31:14 46:22 117:25	hard 13:9 38:5 41:1,21,21	huge 13:7 62:10 104:21 110:6	including 1:21 9:7	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	
handbook 76:1,4 76:9	hard 13:9 38:5 41:1,21,21	hugely 51:22	income 17:13	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	
handed 83:18	hard 13:9 38:5 41:1,21,21	Hugh 65:3,14 66:7 107:17 114:9,13,23	inconsistency 113:7	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	
handful 94:2 102:23 103:9 103:22,24	hard 13:9 38:5 41:1,21,21	humorous 12:20	incorrect 6:18 69:18,20	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	
	hard 13:9 38:5 41:1,21,21	hundred 22:2	increase 31:18	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	
	hard 13:9 38:5 41:1,21,21	hurt 70:20	increases 97:6	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	
	hard 13:9 38:5 41:1,21,21	husband 23:21 24:25 27:17 29:16	incredible 38:16 70:4 89:19	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	
	hard 13:9 38:5 41:1,21,21	hypocrisy 54:18	incredibly 27:18 28:25	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	
	hard 13:9 38:5 41:1,21,21		independently	injury 69:17	involved 77:2 18:20 19:2 37:13 40:2 59:15 60:2 63:22 64:4 65:3,7 72:12 82:23	

13:8 17:1,6,19 17:21,24 18:2 18:5,8,16,22 19:18,25 21:4 21:5 28:8,19 31:3 38:2,11 38:17,25 39:17 39:20,23 40:6 40:8 41:3,8,23 42:2,4,10 43:2 43:8,12,19 45:2,4,20 55:4 55:7,10,16 60:24 68:3 70:6 71:6,11 71:22 72:23 73:5 75:14,17 87:6,11,25 88:12 91:19 94:14,18 96:22 97:16,19 104:14,18,25 105:8 111:4,8 115:9 119:5 justified 6:7 justify 18:19 29:10	36:5 38:12,14 38:19 39:14 40:1 41:15 42:9 44:9,13 45:5,14,19 49:19 50:8 51:2 53:22 54:25 58:22 59:14 60:3 66:6 67:9 69:8 69:8,10 70:5 70:23,23,25 71:4 76:25 77:20,20 79:14 80:17 81:3,20 81:24 82:3 84:16 85:16 86:8,16 88:10 91:8 92:6,12 92:17 93:3,9 93:18,19 96:11 98:10 99:14 100:3 101:12 101:19 102:12 104:4,11,20 105:2 106:2,5 106:6,13 108:5 110:7,15 111:2 115:1,3 116:5 116:7,9 117:18 knowing 50:19 85:8 117:7 knowledge 31:10 71:14,16,18,20 72:2 75:23 76:5 84:11 103:25 115:2 known 37:23 39:6 105:19 knows 37:20 52:13 69:22	lawyers 40:16 105:5 law-breaking 79:12 lead 15:17 64:13 64:14 League 62:18 leak 78:10 leave 15:9 17:25 18:3,5,8 108:23 109:4 109:24,25 116:17 leaving 115:21 led 24:7 Lee 116:14,18 left 11:23 13:19 22:14 44:18 75:7 108:17,18 108:18 109:11 109:11,24 111:11 legal 4:2 13:6 14:19 62:16 104:2,8,13 105:5,12,17,20 105:22 legitimate 38:7 legitimately 93:5 Leicestershire 117:10 Leigh 17:14 18:17 lens 112:16 Les 84:12 letter 18:6 26:19 27:2,3,6,6 108:22 letting 105:18 let's 14:13 19:12 40:22 level 75:10 Leveson 1:6 6:24 8:14 10:12 17:1,6,19,21 17:24 18:2,5,8 18:16,22 19:18 19:25 26:24 28:8,19 31:3 32:25 38:2,11 38:17,25 39:17 39:20,23 40:6 40:8 41:3,8,23 42:2,4 43:2,8 43:12,19 45:2 45:4,20 55:4,7 55:10,16 60:24 68:3 70:6 71:6 71:11,22 72:23 73:5 75:14,17 87:6,11,25 88:12 91:19 94:14,18 96:22 97:16,19 104:14,18,25 105:8 111:4,8 115:9 119:5	libel 2:20 14:20 22:6 library 69:12 lie 78:9,22 91:10 lied 36:6 93:4 lies 42:20 43:6 life 15:6 41:1 56:2,13,23 light 5:19 70:15 liked 15:21 92:3 Lily 99:23,24 113:9,18,19 114:3,19,21 118:7,12,22 Lily's 100:8 limelight 91:14 limit 50:6 116:22 limited 79:15 80:5 line 1:17,17 3:24 25:22,23 26:9 27:11 29:14 50:13 53:20 54:1 111:2 lines 6:22 lining 59:4,8 linked 2:18,22 list 47:21,25 48:3 48:4,18 104:11 110:7,24 listen 106:2 listening 105:20 literally 21:2 23:5 37:9 40:13 litigation 12:8 103:18 106:4 little 25:16 26:3 44:6 95:9 98:1 105:11 116:5,6 116:6 lived 115:19 lives 44:10,15 lob 12:11,14 42:1 42:2 70:22 90:18 lobbed 22:5 70:21 located 73:12 Logically 54:3 London 65:5 84:18 96:6 99:24 113:20 long 14:14 18:6 18:14 23:4 47:4 99:6 112:16 longer 6:7 45:25 61:1 look 19:6,7 25:19 39:25 41:19 46:11 64:11 94:24 100:14 104:14 106:16 110:19 looked 12:16 100:3	looking 22:12 25:21 28:24 39:17 42:5 43:5 51:17 60:14 85:7,8 116:9,20 looks 10:19 40:15 41:25 42:7 looser 56:3 Lord 1:6 6:24 8:14 10:12 17:1,6,19,21 17:24 18:1,2,5 18:8,16,22 19:18,25 28:8 28:19 31:3 38:2,11,17,25 39:17,20,23 40:6,8 41:3,8 41:23 42:2,4 43:2,8,12,19 45:2,4,20 55:4 55:7,10,16 60:24 68:3 70:6 71:6,11 71:22 72:23 73:5 75:14,17 87:6,11,25 88:12 91:19 94:14,18 96:22 97:16,19 104:14,18,25 105:8 111:4,8 115:9 119:5 lose 16:4 62:9 87:12 lost 60:12 lot 25:3 29:8 32:21 43:11,11 48:12 49:5 55:17,18 57:7 57:18,24 59:4 59:5 60:19 63:21,24 64:13 65:1,18 68:18 91:14 98:12 99:11 101:16 101:18 104:15 104:21,23 117:7 lots 87:17 love 26:3 lovely 85:7 low 39:7 lucky 90:18 luncheon 119:8 lying 36:14	37:1 114:4 majority 97:4,10 majorly 42:17 maker 5:2 making 12:20,21 18:11,17 45:16 48:2 61:13 67:3 81:8 82:8 88:18 man 83:1 101:6 managed 69:14 manager 50:13 managing 13:15 23:13 36:13 48:16,19 50:2 76:22,23 102:10 104:7 Manchester 62:13 96:5 manner 28:18 95:24 mark 53:4 market 57:16 87:19 104:20 104:21 married 84:20 mass 29:5 57:16 massive 22:6 26:24 massively 33:2 42:25 80:18,21 material 4:7,16 4:19 5:5,6 9:12 21:8 55:18 56:12 64:13 65:1 matter 2:11 6:8 9:16 10:24 13:9 32:12 33:3 38:5 39:15 62:22 66:15 67:4,7 68:9 78:17 matters 48:6 54:4 74:7 82:12 McCann 115:7 116:10 McCanns 115:13 115:25 116:8 McKenzie 10:11 10:13,15,17,18 10:25 12:12 15:8 17:1 18:10 20:5 26:1,20 31:3 31:13 33:20 34:7 35:14 43:23 44:7 45:21,22 69:23 McKenzie's 44:25 mean 5:3 15:24 15:25 16:15,15 17:1,6,7,8,14 19:12 26:22 32:2 37:12	39:11 41:10 52:2 54:20 68:7 70:23 71:17 75:6 79:18,19 80:16 80:24 84:12 90:2 91:2 94:4 96:10 98:9,10 98:14,16 102:1 102:2,19,25 103:23 104:3 104:19,19,20 104:22 106:22 109:21 110:8,9 110:20 112:22 112:23 113:4 117:6 118:24 means 29:10 62:2 63:8 87:13 meant 109:3 measures 76:7 mechanisms 4:15 media 6:6 61:9 medical 101:1 114:20 meet 32:13 33:18 34:4 74:24 83:3,4 meeting 6:16,20 7:2 8:11 meetings 33:7,14 member 65:7 66:4 69:4 71:25 82:22 88:4,7 92:1 97:9 members 5:9 37:6 58:24 59:22 60:6 62:25 66:19 67:6 68:10 79:12 85:3 87:7 member's 58:16 60:17 memory 65:15 82:17 83:18 108:11 112:7 113:15 mention 9:1 41:8 41:23 48:19 92:23 96:18 100:23 mentioned 25:14 62:20 92:16 97:8 99:21 merely 3:7 5:4 41:3 42:4 met 25:13 78:8 84:25 116:16 Metropolitan 5:15,17 Michael 17:18 18:4 midday 108:4
---	--	---	---	--	---	--

middle 100:15	48:14 61:7	49:10 78:19	notwithstanding	106:10	overspeaking	51:25 52:2,18
Middleton 84:7	97:24 100:25	84:1 114:18	58:13 77:15	officer 85:14	17:20	53:7,13,14,25
mid-market 2:9	moments 74:20	117:14	November 1:11	officers 20:21,23	overwhelming	58:10 61:23
military 91:4	Monday 1:1 4:1	needs 72:1	3:24 25:20	20:24 21:3,8	31:13,20	67:16 69:22
94:11	86:18	Neil 32:5	107:24	42:12 74:8,14	110:22,23	76:1,11 79:8
Miller 103:23	money 15:2	neither 5:3 68:16	nowadays 88:4	74:14 77:3	over-worry	81:13,17 82:11
million 14:20	20:10,14 25:3	networking 61:9	nuclear 38:23	84:9,21	11:20	82:15 84:5,24
23:12 25:3,13	32:2 35:22,24	never 24:13,16	number 1:8 4:12	official 105:6	owned 70:14	86:7 88:20
34:8 41:15	49:23 87:17	25:14 30:6,20	4:23 13:23	officials 20:7,10	o'clock 14:24	95:24 96:18
Mills 68:19	monitor 61:14	30:24 31:24	16:18 21:22	Oh 38:24 41:15	40:22	100:14,15
Milly 5:11 19:12	61:19	41:15 76:21	43:24 44:21	94:1	<hr/> P <hr/>	103:10 106:7
19:13 20:1	monitoring	78:9 87:2	62:24 64:5	Okay 20:5 23:16	PA 97:18	106:17 107:13
mimic 68:23	61:16	97:22 101:3	72:16 83:2	36:17,24 37:24	Paddington 83:3	111:14,15
mind 8:20 61:1	months 16:22	106:1 116:20	84:25 97:4	40:11 41:7	paedophile 78:6	113:11 117:23
63:12 67:19	59:6 71:24	Neville 6:12	numbering	42:6 50:15	page 1:17,17	paragraphs 44:4
84:5	102:21	new 6:4 13:15	25:22	52:17 72:21	3:24 19:17	69:16 82:7
minded 6:23 7:4	moral 2:13 50:21	14:23 49:21	numbers 21:16	75:19 76:10	23:18 25:6,21	84:3
9:12 48:25	morning 1:11,16	76:7 81:14	72:7,8	81:13 100:13	25:23 26:15,16	paraphrase
mindset 71:11	3:24 27:13	91:24	numerous 68:22	106:7,16 109:6	27:11 29:15	32:16
mine 45:17	45:25 83:21	newly 88:24	nutshell 22:25	111:13 115:7	32:4 34:16	Pardon 111:7
minister 24:15	116:16	news 2:24 6:13	33:14 49:24	117:11 119:1	35:1 62:23,24	park 89:3 94:6
34:3,19 37:4	mother 107:17	6:19 7:20 8:4	53:1	old 50:8 62:11	63:2,5 64:23	part 2:24 4:16
37:18	mothers 58:16	24:9 36:6 48:3	<hr/> O <hr/>	83:8	64:25 65:5	15:5 16:1 30:8
ministers 33:12	60:17	50:2,14 59:6	obeying 105:17	ombudsman	66:10,12 86:18	62:4 69:19,21
minor 67:2 77:17	motive 33:25	59:14 62:3	object 93:19	22:23	103:12 111:15	70:23 74:12
minute 81:1	move 1:20 24:19	63:4 65:20	obligation 50:21	once 53:9 109:22	115:11	76:13 87:6
minutes 15:1	60:9 84:3	67:11 68:25	54:9	112:4	pagination 72:6	115:17 117:24
30:2 35:3	moved 11:12	71:22 72:3	observe 72:4	ones 4:2 103:1	paid 12:9 49:23	participant 1:14
72:24 78:14	moving 4:6 20:5	79:11 80:2,3,6	observing 12:23	online 12:17	63:10	participants
108:20 113:17	mug 66:22	80:19 82:21	obsession 75:20	47:24 106:23	pained 58:20	1:19 3:9,18
115:8	mundane 90:12	84:13,14 96:5	obtain 3:20 21:8	106:24	palace 74:12,13	5:17
misbehaving	murder 42:14	98:13 111:18	obtained 41:11	open 67:6	74:18 77:4,6	participate
69:15 70:17	murderers 29:5	112:4 117:17	103:25 109:7	opening 1:12	77:20 78:20	32:22
miscaptoned	Murdoch 14:24	newspaper 1:15	2:7 10:8,8 17:4	operate 23:4	82:8,11 86:8	particular 7:17
115:5	15:4,8,23	2:7 10:8,8 17:4	28:15 40:4	51:23 82:2	86:20 91:3,7,9	9:4 12:3,7
miscarriages	19:22 24:5,8	47:2,3,24	47:2,3,24	operated 23:5	91:20,22 92:4	14:12 39:13
13:8 42:10	24:12 30:5	51:14,18,21	51:14,18,21	operating 95:13	93:1,8,16 94:6	50:5 52:17
mischaracteris...	35:2,5,6,12,13	52:13 57:16	52:13 57:16	opinion 14:7	palace's 86:22	53:16 56:6,11
43:23	44:1,6,9 45:5,6	59:14 70:8	59:14 70:8	29:5 34:10	paparazzi 84:23	56:17 57:3
mislead 78:10	Murdoch's 44:5	83:6 93:21	83:6 93:21	38:6 98:16	85:24 87:11,17	58:10 68:19
misleading 69:2	44:17	95:13 106:20	95:13 106:20	opinions 14:6	88:5 97:25	69:18 79:1,5
misled 93:4	Murray 46:1,5	newspapers 19:1	newspapers 19:1	opportunity 5:18	98:14,17,24	88:23 90:10
misphrased	mutual 49:4,11	28:10,14,17	28:10,14,17	46:24 55:3	101:10 103:17	98:20 100:22
43:10	60:2	35:21,25 36:13	35:21,25 36:13	opposed 4:2	paper 8:6 15:4	101:13 103:6
missed 117:14	<hr/> N <hr/>	53:16 61:7	53:16 61:7	oppressive 117:2	15:15,18,21,23	104:4 105:14
missing 21:15	name 10:16 46:4	84:10 104:19	84:10 104:19	oral 4:9,23 5:6	22:17 28:22	118:9
83:13	71:10 73:9	newsroom 62:12	newsroom 62:12	order 16:20 21:8	30:22 34:9	particularly 9:16
mistakes 38:6	92:23 94:22	75:12	75:12	24:4,20 79:5	37:16 48:2	36:22 43:1
41:12	96:12 98:14,15	night 24:7 35:1	night 24:7 35:1	ordinary 90:12	49:3 51:23	49:6 57:8,25
misunderstood	named 22:8	37:5 44:14	37:5 44:14	organisations	55:18 57:17	66:7 77:21
54:11	names 103:24	60:11 86:18	60:11 86:18	88:1	60:10 62:2	78:24 101:10
Mm 20:4 26:18	nasty 86:15	99:16 101:5	99:16 101:5	original 79:9	64:24 72:18	parties 40:17
43:7 88:13	98:18	nonstop 15:1	nonstop 15:1	Originally 47:9	74:11 78:1	party 35:9
118:2	nature 3:22 4:14	non-intrusive	non-intrusive	ought 9:4 56:6	86:11 90:9	passed 109:17
mm-hm 12:25	16:4 19:3	99:4	99:4	outcome 6:4	101:6	passes 65:1
18:21 20:8	56:25	normal 89:25	normal 89:25	17:13 68:14	papers 2:9 18:15	passing 66:3
23:20 25:25	Nazi 93:15	normally 40:19	normally 40:19	outside 19:7	19:9 35:22	pay 14:20 20:10
26:5,8 28:21	near 89:3,14	50:1 115:6	50:1 115:6	22:13 106:11	43:16 66:8	21:22 36:7
33:5,8 34:17	nearly 75:3	North 89:3	North 89:3	110:16,16	80:7,9,24	47:8 50:1,4
mobile 16:18	necessarily	note 43:20	note 43:20	outweighed	84:16 111:23	63:14,18
model 54:23,24	32:12 91:19	111:12 115:7	111:12 115:7	90:13	116:19	paying 22:2
55:24 56:3,21	106:5,6 116:2	notes 104:12	notes 104:12	overall 59:3	paragraph 11:18	payment 20:7
module 3:11,14	necessary 5:23	notice 2:21 48:25	notice 2:21 48:25	74:21 75:6	15:22 20:6	50:7,10 62:22
modules 3:13	8:17 56:23	notification 2:17	notification 2:17	overegged 42:6	21:13 44:11	payments 20:21
Mohan 22:19	need 3:9 5:20	notified 77:5	notified 77:5	overruled 93:10	47:18 48:22	21:7 49:21,21
45:25	9:15 21:21	notify 77:13,15	notify 77:13,15	oversight 2:15	49:19 50:16	50:7 63:6,7
moment 18:17				4:15		88:15,18

PCC 1:22 2:24 7:8 36:2,4 48:15,17,21 49:13 53:3,22 76:3,17,19,21 77:2 86:13 93:19 108:22 108:25 109:10 109:15 111:12 112:22	91:8 phoned 70:8 83:1 Phonejacker 68:24 phones 88:6 97:6 photo 27:10 103:15 105:15 photograph 23:18,21 26:1 26:11,12,13 28:9 30:23 31:21,22 32:20 47:15 58:14 59:24 60:7,16 86:3 89:8 91:20,21 93:12 99:3,19 100:18 101:14,25 102:7,8 114:10 114:14,25 115:12 119:2 photographer 27:9,15 85:18 88:5 95:20 96:2,3,4,5 99:9 99:15 101:22 108:3,12 109:19 110:4 111:22 112:10 115:20 116:14 116:19,23 118:1 photographers 85:1,10 88:1,2 96:1 98:4,9,19 102:25 106:11 107:23 116:2 116:11,23 117:1 photographs 52:19,20 84:6 88:6 95:25 96:15 98:23 101:10 104:16 105:13 106:19 111:13 112:2 112:13 113:19 113:23 114:23 115:13,22 117:16,19,25 118:9,13 pick 44:11 picked 52:1 picture 10:3 24:23 25:6 27:8,18,18 28:22,24 29:1 29:6 31:14,15 31:18 49:1 58:22,25 79:4 84:17 85:6,6,9 85:9,11,15,20 86:12 88:24 89:4,18,20 90:4,6,9 92:1,3 92:6,6 95:6,11	95:12,14,17 96:14,24 97:8 97:9,20 99:9 99:13 100:5 101:17,19 102:4 105:25 106:18,22 107:1,1 108:6 108:16 109:23 110:13,13 114:16 115:5 116:15,18 117:21 pictures 82:23 83:10 85:2,22 85:24 86:11,19 86:24 87:3,20 94:7,9 95:15 96:17 97:5,7 97:10,12 99:23 99:23 100:2,4 100:10,11,25 103:14 104:21 104:23 105:25 111:17 112:7 113:1 115:21 116:16 118:12 picture's 99:7 piece 6:10 20:19 52:22 65:3,4 pile 18:14,15 pinch 61:17 place 23:14 59:1 66:19 70:22 71:20 75:13 87:18 89:10 112:17,18,23 113:12,21 placed 5:25 plastered 87:23 play 37:16 78:18 playing 62:12 94:7 pleaded 83:25 please 10:15,16 11:16 13:22 16:6 17:19,19 17:21,24 18:2 20:6 22:10,23 23:16 25:18 33:3 35:14 46:3,11 47:1 54:6 73:8 74:6 75:25 84:3 100:15 105:25 113:14 116:20 pleased 14:13 43:19 93:6 plural 3:5 plurality 3:5 plus 34:9 pm 73:2 119:6,7 point 7:24 8:20 9:2 12:19,20 12:21 14:22 16:6 17:12,15 18:11,11,18	29:18 30:11 33:17 45:3,16 63:23 65:21 67:3 68:5 71:25 72:5,12 72:17,19 77:2 77:25 80:14 92:21,22 106:8 108:20 109:2 115:20 117:14 pointed 69:23 pointing 7:7 points 1:9 13:23 30:11 police 5:15,16,17 20:21,23 21:3 21:8 42:12 53:10 83:19 106:9,10,10 policy 49:21,24 53:2 56:9,19 84:14 political 37:6,21 politicians 33:4,7 33:15 34:11 politics 41:17 pondering 11:19 pool 96:8 pop 52:19 54:22 Portugal 115:13 116:12,13 117:8 pose 58:24,25 posed 110:15 position 32:15 34:8 49:24 55:25 56:5,11 56:17,21 57:3 57:24 58:3 64:22 possibilities 52:15 possibility 2:18 8:24 possible 2:14 4:11,22 5:21 41:13 52:5 55:22 58:2 78:13 91:6,18 99:18 possibly 17:9 22:8 25:10 48:1 50:3 91:13 Post 13:15 potential 76:20 88:4 potentially 77:2 85:12 pounds 25:13 pour 37:19 power 34:8 powerful 33:18 78:18 powers 35:17 PR 51:6 60:2 63:20 69:4	70:11 practically 51:1 practice 51:13 51:17,19 64:2 practices 9:14 precise 7:12 32:12 81:20 precisely 71:5 prefer 91:22 93:11 preferable 12:18 preferred 93:16 pregnant 52:24 100:1,7 113:9 113:20 114:4 114:21 118:7 118:19,23,23 prejudice 5:21 preliminary 3:10 3:18 Premier 62:18 premiere 103:15 105:15 prepared 7:22 presence 6:21 present 34:18 presentation 11:2 presented 47:22 presently 2:24 9:12 38:25 press 9:6,11,14 10:1 12:23 23:2 25:16 28:7 35:19 36:1 41:2 42:18 55:2 59:6 74:7,8,14 74:14 77:3,9 83:11 87:21 92:4 95:15 97:13,15 104:16 115:14 115:17 pressing 19:5 pressure 61:9 62:7,10,16 presumably 12:24 26:6 31:24 44:6 63:7 89:18 presume 27:7,8 pretty 45:6 62:6 77:19 86:15 93:18 previous 30:11 76:23 103:16 104:5 previously 4:4 pre-publication 2:17,20 Price 73:6,10 primarily 83:7 prime 24:15 34:3 34:19 37:4,18 41:20 Prince 84:8	86:16 88:7 princes 76:12 78:4 Princess 87:16 principle 91:8 principles 86:7 print 43:1 95:16 106:20 printed 6:10 12:23 104:12 prior 1:9 48:24 prison 17:20 privacy 2:20 12:4 49:14 53:19,24 58:3 58:18 60:16 85:3 86:23 87:8 88:10 100:20 103:17 109:1,10,14 112:20,21 private 5:20 9:8 21:12,14 31:6 33:7 54:5,16 56:2,13,23 66:1,15 67:4,7 67:18 86:16 90:13 92:1,5 99:8 110:3 112:22,23 privately 54:23 55:1 prize 16:24 probably 12:11 12:18 13:20 23:5,7,14 33:10 40:23 58:9 61:20 66:11 75:6,9 75:11 77:19 80:2 82:5 85:22 92:10,11 97:11 98:6 99:10 103:11 108:13,20 110:9 111:10 117:6 probe 51:3 problem 22:3 42:25 72:22 87:6 88:3,12 113:1,3 114:15 problems 97:22 103:19 procedures 4:14 49:20 proceed 46:25 proceeding 3:13 proceedings 1:3 5:22 82:19 process 28:17 69:3 82:16 99:1 production 62:1 profession 62:17 professional 51:24	programme 44:8 prominence 64:19 prominent 64:15 promised 3:25 promoted 47:8,9 62:9 promulgators 2:25 proper 23:14 property 76:14 proportion 96:23,24 97:1 97:3 propagation 41:13 proprietor 14:12 15:9 36:14 propriety 2:6 protect 50:21 protection 84:9 84:21 85:14 proud 51:22 provide 3:15,25 57:16,17 73:9 96:15 provided 4:5,13 8:10,16 10:4 10:20 11:2 26:11 46:18 73:15 95:25 115:14 providing 9:13 provision 2:14 pro-royal 78:1 pub 58:15,23 88:8 public 2:16 5:9 5:25 7:11 8:23 18:18 19:1 20:7,10 27:15 34:10 40:10 53:18,22 54:2 54:15 55:11,19 57:1 59:1 61:3 63:1 65:10,17 65:23 66:1,5 66:13,19,19 67:6,18 82:19 82:22 88:4,7 89:5,7,10 90:3 90:13 93:22 94:6 97:7,10 100:6 103:13 104:5 108:6 112:17,18,24 113:3,12,21 114:16 115:18 publication 7:11 17:2 18:19 32:20 60:8 67:18 77:1 100:12 101:4 101:25 103:14 106:19 114:10 114:14 publicity 21:4
---	--	---	---	---	---	---

publicly 54:24	13:4 23:25	68:1,3 84:4	record 5:7 9:13	reliability 63:12	117:11	92:13
publish 11:21	25:5 26:9 28:5	116:3 117:11	54:3 56:24	reliable 51:4	restaurant 68:14	rioting 26:25
16:21,22,23	28:6,8,19	reader 22:7	recount 4:10	63:19 65:13	69:14,16,25	rise 37:7 47:9
18:23 19:1	29:11 30:19	readers 11:22	red 19:10	rely 52:8	70:16	Ritchie 68:13
28:11 31:20	35:15 36:16,25	20:20 23:1,10	redactions 5:21	remain 9:24	result 6:7 20:12	69:9,12 70:16
48:25 52:3	40:8 43:21	25:4 28:15	5:23	50:22 63:9	44:2 102:8	Road 84:18
56:12,22 58:1	44:9 50:22	31:16 59:5	referred 44:3	remains 13:1	retain 34:11	roared 35:2
58:13 65:22	56:14 58:7	67:11 78:1,3	91:21 100:21	remarkable 71:6	retrospectively	Robert 73:6,10
70:2,16 77:13	60:13 61:19	110:6,24	referring 48:7	71:9	43:5	Robin 100:24
77:14 78:13	65:24 72:1	readership 78:22	52:10 90:16	remember 14:14	return 115:13	114:20
84:6,16 85:2	75:2,22 76:11	readily 41:9	115:4	14:17 26:19,21	returned 82:25	role 22:25 23:13
85:12,21,23	88:20 93:9	reading 34:9	refresh 113:15	27:2,20,21,23	reunited 58:11	54:23,24 55:24
86:1 89:14	97:11 99:1	68:9,11	refused 8:25	27:24 29:2,24	58:24	56:3,21
91:22 93:12	101:14 102:15	real 4:20 94:8	32:17 65:16	30:15,17,25	Reuters 95:15	room 6:16,17
100:18 105:13	105:21 106:17	realised 59:20	100:18	31:2,6 49:5	reveal 13,18	19:7 65:18
113:23	109:9 113:6	66:6	regard 12:3	64:21 65:20	reveal 20:18	87:15
published 4:25	118:6,21	reality 22:4	43:15 100:20	68:12 71:22	reverse 24:4,20	round 97:13,14
11:23 13:18	questioning 6:22	44:20	112:9	79:20,24 112:2	39:1	route 61:4 106:2
17:4 18:24	47:25	really 12:5 15:20	regarded 97:25	113:16	review 2:2 5:14	106:4
20:11 30:22	questions 1:10	17:6,13 18:11	regardless 54:5	remind 1:19 16:7	5:18	Rowling 117:12
31:15 53:11	1:15,17 7:23	19:5 25:21	57:2 58:2	43:22 44:23	rewarded 62:5	royal 42:16
59:24 60:7	8:25 10:14	31:3 47:9 49:2	regime 50:8	reminded 27:13	Richie 71:4	73:19,23 74:2
76:13 77:7	22:10,11 28:4	49:4 50:7	regular 51:6	removed 29:8	rid 63:25	74:8,10,23
89:4 100:11	38:1 45:12	53:17 56:14	69:2 96:8 98:7	repeat 113:14	ridiculous 15:6	76:24 77:5,22
111:23	46:2 63:15,16	60:21 63:22	98:12 104:12	replaced 23:9	37:10	78:3 82:23
publishing 66:14	73:7 94:20	69:17 70:17	107:22	report 9:4 55:21	right 10:6 11:14	83:1 84:24
89:7	107:18	74:3 78:11	regularly 50:17	67:11 102:19	11:24 12:10,11	85:4 87:7,20
pudding 42:6	quickly 41:12	85:8 86:24	68:20,25,25	reported 9:19	13:21,25 16:11	88:25 89:1,21
Pulitzer 16:23	59:13 60:10	87:15 89:25	104:9	55:2	16:14 19:15	90:11,17,20
pull 26:13	64:1 83:10	91:6 94:12	regulation 3:1	reporter 42:16	22:21 23:14	92:2 95:19
pulled 87:2	116:12	96:13 111:3	regulatory 35:17	64:22 74:3,23	27:12 30:10	96:2,3
pulling 86:17	quid 22:2 25:3	reason 27:7	regulatory 35:17	92:9	31:9 32:6,9	royals 77:12
punchy 16:2	quite 7:8 19:25	37:20 41:23	reject 104:16	reporters 59:11	35:18 38:9	82:12 85:12
purchasers 34:9	36:6 37:4	43:3 90:24	rejects 96:16	74:4 76:2	40:18 41:25	93:3,22
purely 67:3	40:14 49:10	94:8	relate 9:15 56:13	79:10 81:9	42:5,7,20 43:2	royalty 90:24
purpose 6:20	58:15 62:21	reasonable 22:7	related 2:15 39:3	reporting 6:11	44:25 45:2	rude 44:13
33:14,15	63:25 64:10	28:6,6 30:1	68:9,12	reports 8:3	46:11,22 47:16	ruin 44:10
pursue 3:22 6:23	69:5,11 70:19	60:15 86:9,12	43:25 76:9,11	107:11	49:14,17 51:25	rules 86:13
18:16	71:6 78:5	86:12,23	82:16 107:16	request 32:18	53:11,18,21,24	ruling 2:1
pursuit 85:2	82:21 84:22	112:19,20	relating 22:11	108:25 109:10	57:5,12 60:21	rumour 81:5
pushes 89:22	92:19 93:6	reasonably 7:18	56:22 66:15	109:14,18,21	61:21 63:10	rumours 80:4,10
pushing 89:2	94:3 98:6	reasons 20:23	relation 11:7,16	require 5:5	67:12 71:11	80:13
put 4:21 5:6 9:12	100:4,25	82:13	16:13 27:11	required 49:23	72:7,14,19	run 27:10 54:8,8
10:23 12:22	quote 6:14	reassure 50:13	32:3 36:3 38:6	research 32:15	73:25 74:5	rung 27:9 72:16
14:13 20:14	quoting 41:3	Rebekah 22:18	47:2 53:2	40:9 103:4	75:8,20 76:17	running 35:19
28:8 36:16,18	<hr/> R <hr/>	recall 7:12 8:2	65:10 72:5	reserved 7:16	77:23 81:20	60:4
36:24 41:5,6	radiation 39:5,7	72:11 79:9,23	79:19 92:24	resolve 2:19	82:18 89:5,6	runs 95:18
46:14 57:20	Radio 68:20	81:7 93:13	101:13,25	45:20	91:23 92:23	Rupert 15:4,8,23
60:1 64:10,17	RAF 76:12	102:1,3,17	105:14 106:19	respect 36:19	95:9 96:1	19:22 24:12
65:13 66:24	raise 1:7 6:9 9:2	103:3 106:14	113:8 117:12	53:5 70:1 87:8	102:2,20	30:5 35:5,12
68:6,17 69:6	32:1,14 45:13	recalled 1:11	117:15 118:3,6	104:10 105:8	105:21 106:9	45:6
70:24 72:17	raised 1:15,23	44:11	118:9	respectful 49:14	111:25 112:15	Rupert's 35:2
77:9 79:4	25:2,13 30:9	receive 5:14 27:6	relations 36:19	respects 22:16	114:6 115:9	Rusbridger 1:18
86:20 87:22	raises 48:18	68:18,22	48:23 49:3	responded 1:22	116:9 117:23	3:7
93:5 99:16	rang 14:25 27:17	109:10	relationship 15:7	responding	rightly 50:17	Rusbridger's
107:1,1 110:24	69:4	received 4:7 15:1	36:22 49:7	105:22	57:20 64:2	1:12
118:6	rape 57:11	27:3,5 40:23	63:23 74:7,13	response 6:2	68:12	<hr/> S <hr/>
puts 101:6	rare 94:3	65:8 68:2 69:1	74:18 78:19	27:4	rights 54:5 66:2	safeguards 2:12
putting 9:11 21:6	rarely 52:4	69:2 108:22	91:3,7 97:1	responses 61:18	90:13	salt 61:17
40:9 43:16	rarer 63:7	109:21 112:12	116:13	responsibility	rigorous 51:10	Sarah 69:8,10
<hr/> Q <hr/>	rates 37:7	receiving 9:5	relationships	47:11 50:16	63:16	70:12
QED 30:24	reach 101:4	26:19 63:13	97:16 99:11	responsible	ring 32:23 51:8	sat 14:18 24:25
quantity 4:13	reached 37:9	98:22 105:12	101:18	31:25 59:17	68:24 70:12,19	30:7 31:24
64:6 117:1	read 8:3,6,7	recognise 9:21	relationship's	responsibly	71:4 92:9	satisfied 52:19
quarter 25:13	23:22 24:22	40:20 41:9	94:11	51:23 58:5,6	101:20,21	99:20
question 2:17 3:1	61:19,21 67:20	recollection 6:17	relative 64:20	59:21	105:24 114:18	satisfy 51:3
		8:11 112:15	relevant 89:13	rest 116:17	ringing 68:20	

63:17 99:2 101:14 saw 8:15 42:8 108:5 saying 14:22 15:16 18:18,22 25:9 27:20,25 27:25 40:20,25 41:1 54:11 62:18 71:3 83:20 110:5 112:6 says 12:17 31:11 42:23 104:14 scale 67:8 80:20 scan 53:1 scare 65:6 67:2 score 62:14 Scott 68:19 sea 39:9 second 2:5 3:23 24:19 26:11 30:6 46:18 56:19 64:14 67:24 94:24 secondly 13:24 78:20 seconds 14:25 Secretary 6:5,6 see 13:17 17:14 21:1,3 22:2 24:24 26:1,14 31:19 33:10,10 33:11 40:14 46:6,10,12 47:14 55:21,23 56:7 67:8 72:7 112:10 seeing 97:6 seek 3:19 63:20 64:3 seeking 3:22 79:3 91:17 seen 6:2 9:3,17 13:16 37:7 49:21 54:22 65:18 89:9 108:5 115:22 sees 88:7 self-evident 62:6 self-regulation 3:2 101:8 sell 28:10,13 selling 23:12 28:16,17 seminar 11:6,8 12:6 34:15 35:7 38:22 seminars 3:16 11:3 send 107:22 sending 14:14,18 senior 20:24 24:23 48:10 sense 15:16,21 22:19,22 32:2 56:3 67:6 81:4	90:22,23 93:24 sensitive 60:20 66:6 sensitively 66:8 sent 27:7 66:8 85:6 108:2,11 sentence 53:25 separate 33:3 September 10:21 34:21,23 37:1 107:19 111:19 112:3 117:18 118:1,14,15 sergeant 83:19 series 1:15 68:23 serious 57:15,19 57:20 66:21,25 seriously 49:8 50:24 53:5,24 58:21 70:10 service 9:5 sessions 1:6 set 1:13 16:16 25:1 56:24 86:7 94:12 111:17 setting 54:2 55:12,14 settle 14:22 settlement 14:21 seven 30:2,9 72:23 116:7 seventh 2:22 seven-year 29:7 shadow 15:3 share 70:4 Sherborne 3:23 43:20,21 45:3 45:10,12,14 she'd 44:8 100:5 she'll 36:4 shifts 89:13 96:11 shit 37:18 shoot 116:18 shopping 89:23 90:5,7 99:24 113:20 short 6:10 55:16 65:4,19 73:1 shorts 64:17 show 21:1 24:15 showbiz 47:3 59:11 62:3 92:9 98:13 showed 59:17 89:20 100:2 118:8 shown 90:24 shut 19:15 side 9:12 57:20 78:4 side's 21:24 Sienna 103:23 signature 50:2,3 50:3 signatures 49:22	signed 73:16 95:1 significance 4:10 5:4 significant 17:3 signs 112:24 114:17 silver 59:3,8 similar 81:19 116:21 simple 34:12 simply 1:18 2:19 14:18,22 15:4 37:17 39:3 42:18,19 55:7 86:3 104:16 105:21 106:12 108:7 110:12 singer 100:23 113:8 118:7 single 45:9 sir 10:7 17:12 18:12 19:19 28:12 31:8 38:10 39:14 41:7 73:3 81:12 sister's 83:21 sit 10:15 17:21 17:24 18:3,5 46:3 48:16 73:8 75:7 94:21 sits 107:11 sitting 37:22 86:21 situation 56:16 58:12 110:3 113:13 116:8 situations 85:21 six 10:7 16:22 23:6 33:12 64:24 96:11 sixth 2:18 six-part 66:11 skip 111:14 sleep 24:6 slightly 18:17 42:16 43:11 70:24 75:11 83:8 91:2 slow 12:17 small 67:9 82:2,5 97:4 smaller 97:3 smart 45:23 46:1 46:5,6,16,24 49:12,25 50:15 54:6,21 56:7 62:8 64:5 65:11 66:13 67:7,16 70:23 72:21 smiling 85:7 smut 6:14 7:13 7:14,24 snobbery 17:8	social 61:8,9 solicitor 6:21,22 8:9 somebody 20:17 21:17,21,22 31:4 42:23 44:6 51:7 66:22 70:7 104:14 somebody-or-o... 36:5 soon 59:14 90:11 sorry 18:9,10 56:14 58:7 94:1 107:3,5,8 113:14 114:11 118:11 sort 13:12 15:3,5 16:2,2 17:7 19:6 24:3 28:2 29:4 52:10,14 75:10 77:17 80:5,11,16 81:3 91:5 95:16 98:12 99:7 100:2 102:20 104:11 105:9,22 107:20 sorts 81:6 sound 37:3 83:7 98:16 115:3 sounded 12:10 sounds 23:11 38:12 44:25 52:16 70:13 71:7 source 35:4 50:19 51:2,3 65:13 81:21,21 81:21,24 82:4 sources 50:12,15 50:21,23 52:18 81:18 sourcing 48:1 50:18 so-called 2:13 speak 5:5 15:14 21:17 22:4 63:21 77:19 85:14 99:9 100:8 102:11 SPEAKER 17:18,20 18:1 18:4,6 speaking 72:12 specialist 79:1 specific 7:4 22:11 49:18 51:10 76:10 106:16 107:14 107:18 specifically 36:24 49:11 79:18 106:24 speech 9:10 13:14 34:25	53:23 58:4 spend 11:19 49:5 spent 60:19 split 58:12 spoke 27:14 50:10 60:2 spoken 54:24 109:19 spoof 68:5,21 Sport 6:6 sports 11:13 96:3 spot 117:8 spotted 48:19 101:2 sprawl 26:25 spreads 64:25 Squidgygate 81:1 stable 24:10 staff 47:22,23 48:2 49:9 50:17 63:24 65:8 66:4 69:4 71:25 73:24 75:9 76:1 79:12 80:1 96:1,12,23 97:3 98:3 stage 3:21 9:3 stand 12:12 52:9 64:1 81:22,25 standard 16:14 84:18 86:4 106:18 107:4,7 standards 16:11 16:25 17:12 18:12 stands 11:4 59:15 star 52:19 54:22 start 1:6 32:1 68:18 94:16,22 started 4:1 14:17 75:6 93:3 starts 25:21 state 3:1 6:6 20:17 stated 7:6 55:25 statement 5:2 8:10 10:20,23 10:23 11:17 15:22 20:6 24:22 32:9 35:4 43:25 44:4 46:10,13 46:14,19,22 47:19 49:19 56:2 61:24 67:16,24 68:1 68:2 73:13,15 73:16 75:25 76:8 77:9 79:8 83:25 90:15 95:1,4,4 99:22 109:13 113:11 113:16 117:24 statements 4:8	4:24 states 53:3 stating 7:9 8:2 stationed 115:17 Statistics 41:20 status 51:18 stay 26:16,20 29:17 stayed 108:13 staying 37:9 steps 101:13 Steve 92:9,11,16 Steven 68:11 stick 82:17 83:18 sticks 19:16 stolen 82:17 83:22 Stone 17:18 18:4 stop 26:10 84:17 stories 17:16 19:1 20:11,22 21:9 47:21,23 47:25 49:13 52:4,9 55:17 57:1 60:9 61:3 62:23 63:4,13 64:1,6,11,12 64:12,15,16,23 67:9 68:8,15 69:24 70:22 75:20 76:19,20 77:5,17,22 78:3,25 85:16 85:21 86:11 87:24 88:15 90:17,20 story 7:4,7,9,13 7:17,21 8:1,16 8:23 11:20,21 12:7,8 14:11 17:3 18:19 19:4,16,20 20:1 21:25 22:3,6 23:18 37:16 44:25 48:18,25 50:13 52:3 53:11 54:4,7,10,13 54:17 58:13 59:2,4 60:1,3 61:11 62:25 63:18,19 64:19 64:20 65:7,8 65:11,16,18,20 66:1,11,12,14 66:20 67:1 69:3,6,21,24 70:7,12 71:7 72:10,15,17 76:13 77:1,12 77:14 78:10,10 81:22 82:1 87:2 89:24 90:18 91:9 93:5,16 108:17 115:16 story's 51:5	straight 54:3 56:24 84:15 89:11 101:3 102:14 108:23 straightforward 36:12 stream 96:17 97:12 street 81:4 83:16 90:21 91:15 100:6 108:6,8 112:7,24 113:3 114:17 strong 7:6 27:18 29:1 31:14 33:22 strongly 28:10 32:25 stuff 20:25 80:17 subject 2:1,11 4:23 9:22 54:16 99:19 subjects 99:14 submissions 1:12 1:14 3:16,20 3:25 5:20 submitted 4:19 4:24 subsequently 2:1 substantiated 64:7 substituted 16:10 subtract 11:8 successful 17:11 19:9 suffered 24:17 44:20 suffering 100:24 sufficient 42:5 suggest 54:3 58:17 suggested 2:10 37:24 suggesting 6:5 92:14,24 107:3 suggestion 39:3 70:7 suggestions 6:2 summarise 67:25 78:17 summarised 5:1 52:21 90:14 summary 5:7 summer 3:17 34:20 94:5 sun 10:7,8 11:11 11:12,22 12:24 13:3,19 14:19 15:11,13 16:5 16:22 17:10 18:13,24 19:14 19:14,21 20:10 20:13,19 22:12 22:13 24:9,23 25:1,4,6 26:17 26:23 27:16
---	--	---	---	---	---	---

30:8 31:19,25 32:5,14 33:6 33:22 34:1,18 37:13 42:15,16 44:22 47:2,3 51:14,17,20 52:7 56:9,19 57:11 62:11,12 62:19,24 65:4 68:6,15 71:15 71:18,20 73:19 73:24 75:3,4 75:19,23 77:5 77:25 80:4,7,8 80:14 91:5 95:7,12,20,25 96:15,15 97:2 98:22 99:2 104:19 107:22 111:23 115:16 116:2,13 118:8	78:21 sympathy 116:8 syndication 96:9 system 2:19 82:7 88:18 <hr/> T tab 10:19 23:19 25:19 26:2 28:25 34:16 46:12 72:6 73:4,12 94:17 94:25 table 92:2 tabloid 2:9 34:4 take 19:12,13 27:6 30:24 38:18 41:17,18 41:19 45:3,25 48:11,14 49:8 50:16,24 53:5 53:23 57:7 58:5,21 61:10 61:16,20 67:20 70:10 71:20 72:23 85:7 101:12 102:13 105:25 116:16 taken 4:8,21 19:21 23:13 45:8 56:10,17 56:20 57:2 58:14,23,23 60:16 85:9,15 85:19 86:12,19 89:18 90:4 92:1 97:20 98:23 99:3,8 99:13 100:5,19 101:15,23 102:8 103:15 104:24 105:14 108:16 109:23 111:18 112:7 112:14,14,16 117:19,25 118:14,15 talk 49:10 57:21 116:11 talked 65:12 talking 30:4 40:2 41:6 102:22 103:21 109:21 tapes 80:25 81:1 targeted 80:21 targets 101:10 tea 74:24 78:8 team 64:25 74:25 99:5 technology 80:22 81:3 97:5 teenagers 68:22 telephone 5:11 62:24 114:8,12 television 89:11 117:1 tell 24:1 36:4	37:1 40:21 42:20 47:1,20 78:15 79:6,8 81:16 82:20 86:14 95:6,9 107:22 110:10 115:11 telling 109:13 tells 109:20 ten 33:13 64:11 75:3 tenets 43:13 term 7:24 53:15 97:25 98:1 terms 7:6,22 16:11 48:5 70:24 77:11 80:19 81:5 82:9 85:23 99:2 terrible 37:14 42:18,18 Tesco 90:5 Tesco's 90:7,19 97:9 test 2:16 42:5 thank 8:14 10:12 10:18 11:10 37:25 45:2,21 45:22 53:7 60:23 67:15 68:4 71:14 72:21,23,24 73:5,11 75:2 88:14 94:13,14 94:15,18,24 95:18 96:7 107:13 117:11 119:4,5,6 Thatcher 33:11 36:20,23 themes 55:22 they'd 54:24 59:19 83:10 85:19,20 106:12 thing 11:24 19:22,23 20:15 28:2 40:3 54:4 55:17 59:10,11 63:22 69:7 70:2 78:7 82:23 things 13:17 14:1 15:5,19 40:3 40:13 41:2 42:20 60:24 61:6 80:18,25 think 4:3 10:21 12:18 13:1 14:2,22 16:3 17:2,14 18:13 18:14 19:6,19 19:23,25 20:2 20:14 21:4,15 22:17,18,19,24 23:10,12,13,14	27:4,5 28:12 28:14,22,25 29:2,2,25 31:4 32:5,7,9 34:7 34:20,22 35:18 36:3,8,11,25 37:24 39:17 42:21,22 45:9 46:22 47:8 49:3,16 51:23 53:17,20,21 55:22 56:5,25 58:5,8,9 59:17 59:19 60:20 62:10,23 65:4 65:15 66:10,20 67:2,10 68:6 68:10,12 69:6 69:18,22 70:18 72:11 74:20,21 75:1,6,9,14,20 76:7,8 77:21 77:25 78:1,3,7 79:3,16 80:24 81:9 83:19,24 83:25 84:17,19 84:21 86:18,25 87:4,19 89:19 90:5,9 91:2,6 91:16 92:19,21 93:9 94:16 96:17 97:7 98:14,16,17 99:7,21,24 100:23,24 102:15,20 103:1,2,8,22 103:22,24 104:22 106:14 107:6,19 108:4 108:4,11,13,14 108:17,20 109:9,11,13,22 110:6,8,9,10 111:2,10,21 112:3,3,8,12 112:22 113:2,3 113:5 114:3,6 114:7,15,18,19 114:21 115:4,5 116:9,21,22,25 118:6 thinking 11:25 60:19 83:5 third 2:12 4:6 30:25 79:6 111:15 Thompson 116:14 thoroughly 52:5 thought 12:21 18:25 20:19 28:16 32:24 33:1 59:1 69:17 79:7,24 83:5 114:15 117:6	threat 36:11 three 45:24 67:17 71:24 73:11 79:4 86:8 three-quarters 17:7 throw 12:17 37:2 thrust 91:14 Thurlbeck 6:13 6:16,20 7:3,5 7:22 8:20,24 Thurlbeck's 6:12,17 Thursday 88:25 tilted 67:13 time 3:14 4:22 7:17 8:19 11:19 12:1 14:8,24,24 22:24 23:7 28:9 32:5 40:12,22 41:9 49:2,5,16 57:10 58:11,20 60:8,19,25 61:4,6,11 65:17 68:19,21 69:6,13 70:18 70:19 74:22 78:16 80:3,4 87:12 89:9 96:14,14 99:6 99:25 101:20 101:21 106:25 108:16,18 109:25 112:11 112:25 113:2 114:1 115:4,7 116:7 117:5,20 times 6:11 8:2 33:13,13 35:23 58:6 85:17 116:15 Tinglan 107:16 tip 52:24 tipped 114:6 tips 51:9 88:15 tipster 83:1,17 tip-off 65:13 title 19:4,22 titles 1:20 9:15 24:9 84:15 98:12 today 10:7 11:13 15:12 21:23 25:3 29:5 43:1 117:8 told 6:12 24:2 30:2,21 34:15 35:5,12,13 43:25 79:21 82:9 89:24 103:8 110:23 113:7,17 114:24 tolerance 79:11	tomorrow 37:16 tonight 40:22 Tony 16:18,18 top 18:15 29:9 48:3 50:24 63:2,5 69:1 topic 1:10 3:3,23 4:6 5:10 6:8 60:13 topics 1:24 tops 19:10 totally 90:8 touch 59:16 76:8 87:21 touched 103:11 Townsend 44:5 44:17 tracked 22:5 trained 84:9 transcript 1:16 1:24 11:2 23:22 25:19,22 transfer 63:8 treated 99:14 treatment 62:14 tremendous 17:8 116:7 Trevor 37:21 tried 49:2 66:22 93:5 tries 13:9 trivial 55:17 57:8 57:10,14,25 64:16 69:5,17 69:24 70:2,9 triviality 64:20 trolley 89:2,22 trouble 8:17 31:5 104:15 true 11:21 29:6 32:23 54:5,7 54:13,14,15 62:10 67:4 68:16,17 71:3 71:8 87:14 91:9,10 truer 30:10 trumped 110:25 trust 49:4,11 92:12,14 97:23 truth 10:23 16:25 35:25 38:14 40:4,5 42:9,21,22 43:6 46:14 54:2 56:24 73:15 95:4 truthful 16:24 try 23:1 35:22,23 38:5 42:19 77:12 78:14,15 87:11 103:7 trying 12:20 16:25 35:8 43:5 68:20,22 79:24 92:22 93:4 110:19,20	114:21 Tuesday 108:12 turn 10:5 24:7 83:4,15 100:10 turned 65:19 66:18 turning 39:4 turns 42:12 TV 11:13 68:23 115:17 116:11 116:23 twenty 108:20 twice 33:11 Twitter 59:13 60:11 61:3,14 63:4 two 13:4 14:1 24:23 25:14 30:4,11,16,24 31:8 36:18 38:15 47:24 55:22 64:23 65:15 68:5 69:16 76:12 78:18 83:24 110:8 117:21 types 2:7 typical 82:21 <hr/> U ultimately 43:15 50:23 uncertainty 38:14 uncomfortable 113:5 underlined 85:1 underneath 46:12 understand 6:8 8:21 38:4 41:5 48:23 50:20 51:1 53:15 56:14 58:19 60:5 66:17 95:19 96:22 105:11 118:11 understood 44:2 50:20 unfair 91:1 111:4 unfortunately 26:23 United 62:13 unknown 21:20 unpleasant 37:2 unsurprisingly 34:11 untrue 9:19 70:25 unusual 77:21 upbeat 15:19 upset 30:7 use 21:12,14 27:19 29:19,21 29:21 30:21 86:13,24 90:3
--	--	---	--	--	---	---

90:7,9 92:5 93:17 94:9 105:2 110:20 usually 48:24 64:3 uttered 6:15	92:9 105:3 wanting 20:24 31:6 wants 92:19 war 16:20 wasn't 12:20 14:13 15:2 18:22 21:10,10 23:9 32:7 33:2 37:4 39:6 54:24 59:23 60:8 66:25 67:7 77:18 79:3 80:5 87:16 94:11 108:7 109:1 110:2,20,22 114:25 118:8	53:10 83:3 89:12 weren't 42:24 55:1 59:17 68:7,17 110:11 110:11,12 we'll 29:21 41:25 48:14,17 64:15 67:19 72:23 79:22 81:15 84:4 86:14 91:23,23 92:18 97:24 119:5 we're 10:8 29:21 38:12 46:9 49:13,18 59:12 62:21 63:15 67:20 70:5,6 85:6 109:21 we've 11:2 22:11 29:16 49:21 65:12 68:1 74:25 79:3 81:19 84:4 85:8 88:19 93:24 97:21,22 98:16 99:5 103:19	47:20 57:8 64:24 66:13 82:20 108:1 work 16:13 39:5 49:11 57:15 74:9 75:13 79:13 90:19,20 98:10,12,21,21 99:5 118:3 worked 13:14 20:13 24:25 32:1 45:6,8 62:16 71:24 99:6 working 13:16 24:12 30:5 45:23 51:14,17 51:20 62:12 74:4 90:19 93:3 98:2,3,20 100:1 works 47:14 51:1 world 6:13,19 7:20 8:4 13:7 13:21 71:22 72:3 80:6,19 82:2 87:4 94:12 97:13	yeah 48:8 51:16 51:24 54:7 55:6,15 58:19 61:16 62:10 64:21 80:16 82:14 89:17 96:17 98:21 101:16,16 102:5,24 103:9 103:20,24 104:3,3,12,17 104:17,19 105:4,10,16,24 106:22 107:11 107:15,21,25 109:16,19 110:1 112:1,7 112:7 113:10 113:18,24 114:7 117:22 118:5,14,16,18 118:20 119:3 year 3:5 10:21 33:11,13 46:13 64:12 73:13 84:16,25 91:25 95:2,7,10 107:19 117:18 years 13:18 14:17,17 17:20 23:6 24:12 25:8,12 26:22 27:23 29:3,25 30:5,9 31:10 33:1 42:14 44:22 45:7 47:5 63:7 75:3 75:8,9 76:5 95:22 97:22 101:18 102:22 106:15 York 13:15 14:23 younger 75:10 75:12	12-week 53:1,4 12.O2 73:2 13 13:18 21:13 24:12 30:5 31:10 53:13 14 1:17 17:20 46:13 53:14,25 72:6 73:13 15 37:10 58:10 82:7 85:25 98:23 113:17 15,000 96:19 150 40:23 16 1:11 3:24 82:7 17 3:24 42:14 82:11 18 61:23 82:15 19 95:1 1980s 33:21 1981 11:11 33:6 1988 95:13 1990s 22:24 33:22 1992 37:1 95:12 1994 11:11 12:24 13:2 33:6 1998 7:5	3 3 23:12 46:12 66:10 76:1 3,000 20:14 64:12 30 14:17 75:9 95:22 30-odd 45:7 300 86:20 32 25:19 33 23:19 28:25 33142 72:7 35 75:8 38 1:17 88:20
V valid 118:8 value 8:23 vantage 115:20 varied 33:10 variety 61:18 various 40:17,23 Vegas 86:17 vehicle 85:18 verb 12:13,19 28:20,21 verdicts 38:16 version 21:24 31:11 veterans 38:23 40:24 vicinity 108:19 victim 57:12,13 view 6:13 7:13 8:23 12:10 13:17 15:15,18 17:11 18:13,15 22:12 38:21 43:4 51:20 57:7 77:25 80:14 89:4 90:17 117:8 viewpoint 8:4 views 2:6 3:12,19 33:16 violence 57:14 virtue 9:10 visible 112:24 114:17 visit 65:5	watch 106:13 watched 89:10 watching 44:2 water 39:8 way 3:15,21 9:25 13:6 14:13 19:20 20:13,15 21:20 22:1 24:8 25:10 27:25 28:8 32:20 40:16 44:16 52:5 54:23 55:1,11 55:12 56:1,6 61:7 68:1 76:13 78:17 79:22 81:7 85:8 86:12 90:12 109:3 ways 2:4 13:5 wearing 113:12 113:21 website 4:25 5:8 8:13 44:24 websites 87:23 104:22 wedding 89:1,2 90:11 week 1:21 2:2 57:13 64:12,22 64:25 69:11 81:15 89:1 96:11 109:8 110:20 weekend 117:7 weeks 111:19 weigh 49:15 54:12,15 65:23 65:25 weighed 58:22 59:11 60:18 65:10 weighing 67:17 90:3 weighs 58:4 well-known 100:24 went 7:11 14:23 33:20 45:9,15	whilst 33:6 whistleblow 20:11 wholeheartedly 58:19 wholly 15:6 wider 1:10 2:24 79:15 104:20 William 78:2 82:24 84:8 89:12,12 94:5 win 87:13 wire 95:15 wish 6:10 7:6 11:8 21:1 24:1 wished 4:10 wishes 4:3 6:9 31:21 94:3 witness 10:10,20 17:22 30:12 43:24 44:4 45:23 46:10,12 46:18 73:3,12 75:25 90:16 94:16,25 witnesses 4:10 4:13 6:25 10:7 42:12 45:24 woman 44:13 113:19 115:1 woman's 107:23 wonder 42:4 83:5 wondered 34:5 wondering 81:11 word 98:18 words 6:15 7:12 21:15 22:5 28:3 35:2	worldwide 15:12 worst 62:9 91:10 worth 77:18 worthwhile 1:7 32:18 wouldn't 20:15 21:10 58:16 70:14,22 81:24 85:16 89:18 92:20 98:6 106:5,6 117:3 write 20:20 21:2 21:2 53:3 55:17 57:1,14 57:15 63:4,24 64:11 78:24 writer 79:1 writing 78:5 written 3:25 4:8 4:14,15 18:6 26:15 65:19 66:7 80:11 93:23 wrong 19:16,20 20:2 30:3,17 36:7 39:9 40:4 40:13 42:13,16 42:17,19,19,24 49:17 53:22 78:3,25 84:19 90:23 98:6 wrote 7:4 18:23 18:24 64:23 93:15	zero 79:11	2 2 11:18 46:11 62:24 63:2 73:11 89:10,21 95:24 107:24 2.05 119:6 20 14:17 25:8 29:25 33:1 35:2 41:15 96:8 20,000 96:19 98:23 20-odd 26:22 27:23 29:2 2000 95:7,11 2002 73:24 2003/4 71:23 2005 73:23 2006 79:13 2007 72:13 84:7 2009 34:21,23 47:8,11 73:23 76:13 2011 73:20 112:14 117:20 118:1 2012 1:1,7 21 111:19 112:3 118:1,14,15 22 84:3,5 23 1:17 25:22,24 26:9 84:3,24 86:7 25 89:23 25,000 83:17 250,000 25:2 30:9 26 107:19 117:18 28 25:20 67:16	3 3 23:12 46:12 66:10 76:1 3,000 20:14 64:12 30 14:17 75:9 95:22 30-odd 45:7 300 86:20 32 25:19 33 23:19 28:25 33142 72:7 35 75:8 38 1:17 88:20
W wait 109:9 waiting 4:3 5:13 39:14 65:17 waived 57:12 wake 58:16,23 60:16 Wales 89:3 walk 53:20 111:2 walked 111:5 walking 108:7 Wallis 32:5 want 1:22 5:17 18:16 21:3,24 34:4 50:22 60:7 63:22 65:22 66:3 70:12,18,19 78:24 81:22 83:12 87:22 100:10 108:9 wanted 1:19 21:16 32:13 34:11 43:21	4 4 23:12 34:8 44:3 44:4 47:18 73:4,12 76:11 4.2 100:14 40 15:1 44 1:17	5 5 82:5 5.1 100:23 113:11,16 50 64:8 85:23,25 87:13,13 53350 103:12 53352 115:11 54 3:24	6 6 27:11 60 64:12	7 7 10:19 14:25 48:22 7.1 103:10 7.20 86:18 71 25:21,23 73 27:11 29:15 32:4	8 8 14:24 16:6 34:16 44:11 49:19 8.1 106:7 80 64:9 80s 14:10 15:12	9 9 1:1 3:11 15:22 50:16 51:25 106:17 107:13
X X 105:14	Y					