

<p>1 2 (2.05 pm) 3 LORD JUSTICE LEVESON: Before we start this afternoon, could 4 I just say something that I meant to say this morning? 5 I'm grateful to those core participants who have 6 prepared skeleton arguments of the evidence, or skeleton 7 positions of the evidence, which I found particularly 8 useful. If I'm going to single out one for specific 9 mention, I do single out the summary of evidence which 10 you've provided, Mr Rhodri Davies, which I've found 11 extremely valuable. It's obviously been a lot of work 12 and I'm very grateful to all those who have taken part 13 in it. 14 MR JAY: Sir, may I call Justin Walford, who is under tab 5 15 in your bundle. 16 JUSTIN HUGH WALFORD (sworn) 17 Questions by MR JAY 18 MR JAY: Make yourself comfortable, Mr Walford. First of 19 all, your full name? 20 A. Justin Hugh Walford. 21 Q. Under tab 56 the second file, you'll find your witness 22 statement or a copy of it, dated 14 October of last 23 year; is that correct? 24 A. Yes. 25 Q. You've given a statement of truth and your signature and</p> <p style="text-align: center;">Page 1</p>	<p>1 to get good stories in to really entertain and hit the 2 market, and I think there is that desire there. 3 Perhaps -- I'm not a football-mad person, but perhaps 4 the analogy with Manchester United is fair, to be at the 5 to be top, if you like, and I think that is there and 6 that is something which runs throughout the newspaper. 7 That's not in any way to put down 20 wonderful years 8 at Express Newspapers, but I think there is a very tiny 9 difference, yes. 10 LORD JUSTICE LEVESON: I wonder whether I could divide 11 Mr Jay's question into two. The 20 years that you 12 worked at the Express, '85 to '05, covers an enormous 13 span of time. 14 A. Yes. 15 LORD JUSTICE LEVESON: It covers the death of the Princess 16 of Wales and many other quite important national events. 17 Did you see a change in the way in which the work was 18 addressed at the Express over that 20-year period? 19 A. Yes, sir, I did. I think that there has been, at 20 Express and indeed I think probably throughout 21 Fleet Street, a much more professional approach to 22 matters. I felt as a lawyer that perhaps 20, 25 years 23 ago, one's influence perhaps couldn't be -- was not so 24 important, or was not thought to be so important. I do 25 think now there's been a change. I do think that -- and</p> <p style="text-align: center;">Page 3</p>
<p>1 the date? 2 A. Yes. 3 Q. In terms of your current position, you are currently the 4 editorial legal counsel at News Group Newspaper Limited, 5 which publishes the Sun and of course previously and 6 formerly the News of the World, and you are effectively 7 now the legal manager of the Sun; is that correct? 8 A. It's not strictly correct, because in fact once 9 Tom Crone had left, we had a new legal director came in 10 called Simon Toms and a new lawyer joined me, Ben 11 Beabey, and we are technically at the same status. We 12 both report to Simon Toms. 13 Q. Thank you. You were and you still are a barrister. You 14 were called to the bar in 1981. You practised at libel 15 chambers and in 1985 you joined the Express and you 16 moved on to NGN in 2005. 17 If it's not an unfair question to ask -- and tell me 18 if it is -- is there a difference in culture, in general 19 terms, between the Express Newspapers at the time you 20 were there and then News International? 21 A. Yes, I think there is a small difference. I think that 22 what was said about Premiership teams -- I think all 23 national newspapers are probably Premiership teams. 24 I do think at the Sun, sir, that there is very 25 definitely a culture that they are there to be the best,</p> <p style="text-align: center;">Page 2</p>	<p>1 that happened while I was at Express Newspapers. 2 I think there was a -- much more of a realisation that 3 matters needed really to be properly sourced, properly 4 checked before they went in. 5 I'm not trying to suggest for one minute, sir, that 6 there was a Wild We. There wasn't. But I am trying to 7 suggest that -- my honest view is that over the years 8 there has been more of a professionalism in the way -- 9 LORD JUSTICE LEVESON: So "if it sounds right, lob it in", 10 is that Wild West? 11 A. When I was at the bar, I used to libel-read at the Sun 12 twice a week with Kelvin, and so I saw the lobbying. 13 Things have changed very, very radically from that 14 period of time. It was a very exciting time to be 15 a lawyer, going in and watching that happened, but 16 things are very, very different now, and in fact I think 17 towards the end of Kelvin's editorship -- I suspect 18 things were very, very different by the end and I think 19 this morning he accepted that. 20 LORD JUSTICE LEVESON: Is this a developing pattern that's 21 still going on or is it really just a couple of sea 22 changes? 23 A. There have been a couple of sea changes, one of which is 24 obviously the law of privacy, which is massive. It's 25 a several oceans change. But it is still developing.</p> <p style="text-align: center;">Page 4</p>

<p>1 I think the fact that this Inquiry is going on, what 2 happened to the News of the World -- one can see, 3 I think, everywhere, the people I deal with and work 4 with, you can see that's made a deep impression on them. 5 I think they are taking on board that there have been 6 some massive seismic changes in Fleet Street, and 7 I think -- so at the moment I would say I think there is 8 still a development of that, it is still going on, of 9 people analysing even more deeply about making decisions 10 about stories. So I think there is almost an added 11 emphasis all the time that's been growing in my period 12 in Fleet Street.</p> <p>13 LORD JUSTICE LEVESON: Your indication of a graph going 14 gently upwards, I'm afraid, causes me to interrupt 15 Mr Jay for a little bit longer. Is it a gentle movement 16 upwards or is it up a bit when there's a problem and 17 then slowly reverting a bit, then up a bit when there's 18 a problem and slowly reverting, and now, if one takes 19 the events of the last six months, up quite a bit, 20 because of the reasons you've identified -- although the 21 consideration that some people are horrified about what 22 I might do causes me some concern -- but then a risk 23 there will just be a slip.</p> <p>24 You can't comment on the future, but you maybe can 25 comment on the past, and you walked into this by giving</p> <p style="text-align: center;">Page 5</p>	<p>1 there's plenty of new stories that need legalling. So 2 day to day -- I mean, there might be eight or ten 3 stories a day that might need legalling, and perhaps one 4 or two, three of them possibly, celebrity stories. It 5 would depend very much on the particular news schedule 6 that day. But there is a percentage of it that 7 certainly is celebrity, but it's not everything, sir, 8 no.</p> <p>9 Q. You mentioned privacy -- 10 A. Yes. 11 Q. -- and the Naomi Campbell case, but there are other 12 cases, of course, which have built up the privacy 13 jurisprudence in particular following the incorporation 14 of Article 8 into domestic law through the Human Rights 15 Act. In your own words, what has been the impact of 16 that, following particular 2 October 2000? 17 A. Well, as I mentioned, I think that the real impact was 18 felt after the Naomi Campbell judgment in the 19 House of Lords. I think that really did start to make 20 an impact, and the impact was, I think, primarily 21 because -- before that, my recollection is that there 22 were not a huge amount of privacy complaints. The 23 period of time from sort of 2000, 2002, 2003, there were 24 not a huge number of complaints. And, of course, as 25 I remember -- I think I'm right on this, sir -- the</p> <p style="text-align: center;">Page 7</p>
<p>1 me a gentle graph.</p> <p>2 A. Yes, I blame myself. Yes, sir, I think the graph was 3 wrong and you picked it up. I think it is a series of 4 jumps. I'm not sure that it slips back so much -- I've 5 not felt that -- but it does go up in a series of jumps. 6 I think that is true. One of the jumps being, for 7 example, the Naomi Campbell case, which caused, when 8 that went to the House of Lords, an enormous change with 9 regard to practice. But even that took some time to 10 work its way through into newspaper practice, and the 11 difference when I first joined News Group in 2005 in the 12 approach to privacy matters to now has been -- you know, 13 there is a difference, and I think there's much more 14 consideration of privacy than there was even then, and 15 that was two, three years after the House of Lords case.</p> <p>16 LORD JUSTICE LEVESON: Sorry, Mr Jay. 17 MR JAY: A couple more general questions. The Inquiry has 18 focused to some large extent on the issue of celebrity 19 and privacy issues which are related to that. In terms 20 of the percentage of your work day to day in the Sun, is 21 most of your work tied in with celebrity issues or would 22 that give the wrong picture? 23 A. I think it would give slightly the wrong picture, but 24 it's certainly true that celebrity issues do play 25 a major part in the work that I do day to day, but</p> <p style="text-align: center;">Page 6</p>	<p>1 Court of Appeal actually overturned the original 2 judgment in that, so that there was a sort of slight -- 3 if you like, it went down slightly at that stage. But 4 certainly the claimant's solicitors picked up the baton 5 very, very definitely after that judgment and I think 6 there was a gradual -- sort of a wheel beginning to turn 7 faster and faster as privacy became more and more 8 important.</p> <p>9 Q. Thank you. May I address now how you are engaged in 10 relation to the giving of advice? You probably cover 11 this in paragraph 16. 12 A. Right. 13 Q. Obviously the editor or the deputy editor can ask you 14 for advice directly, presumably if the issue appears to 15 them to be important enough; is that correct? 16 A. Yes. 17 Q. But is this also right: that through the system of libel 18 reading, which obviously occurs at the coalface through 19 more junior people, if particular problems arise, they 20 come to you for a second opinion or final view; is that 21 correct? 22 A. Yes. There is a system, basically -- and I hope I've 23 set it out here, sir -- you can see the paper is 24 libel-read. The paper will be looked through by a 25 lawyer and various stories will be put into the legal</p> <p style="text-align: center;">Page 8</p>

<p>1 in-basket and will be amended and pushed back, and on 2 the vast majority of stories if the lawyer makes some 3 marks, there's not going to be a huge discussion about 4 it. My role would come in very much more -- each 5 evening, I would try and go to the back bench, possibly 6 see the editor at about 6 o'clock and just find out 7 what's in tomorrow's paper, are there any issues. 8 Sometimes a news editor might come and speak to me 9 or a journalist might contact me during the course of 10 the day, the afternoon in particular, perhaps, and 11 I would get involved there, but I would try -- each 12 evening that I'm in work, I try to find out what's in 13 the next day's paper, if there are any major legal 14 issues, deal with those. It's not a matter of dealing 15 with every one, no, but dealing with the major legal 16 issues. I have always felt that an editor expects an 17 in-house lawyer to deal with any major issue if they're 18 there. 19 LORD JUSTICE LEVESON: Would it be right that all you're 20 doing -- I say "all" -- what you are doing is providing 21 a risk assessment from which the editor will make 22 a decision? Is he prepared to take it or not? 23 A. I think that's absolutely right, sir. I don't -- and 24 I suspect this is true of my colleagues on other 25 newspapers -- see myself as having an editorial role.</p> <p style="text-align: center;">Page 9</p>	<p>1 obviously we're there to discuss any issues of public 2 interest or whatever that arise. 3 LORD JUSTICE LEVESON: I'm sorry, Mr Jay. 4 To what extent -- and just give us a flavour -- is 5 that advice accepted or rejected? Give us some sort of 6 feel. 7 A. Most, nearly all the time, the advice will be accepted. 8 I don't actually believe that there's any in-house 9 lawyer can last at a newspaper group unless the 10 relationship is such that advice is being given and 11 advice is being accepted. The relationship -- you have 12 to have a trust there. 13 Having said that, there will be occasions when an 14 editor decides that he or she -- and it happened all 15 throughout my career -- nevertheless wants to press 16 ahead with the story and that is a matter for them, sir. 17 LORD JUSTICE LEVESON: They take the risk. 18 A. To put it bluntly, yes. But I hope it's not a risk in 19 terms of sort of deliberately breaching court orders or 20 anything like that, or publishing pictures of people who 21 are rape victims or anything like that. It's very often 22 a matter of -- you know, particularly with privacy 23 stories, for example, you have two -- I hope this is all 24 right for me to say. There are two stages in the 25 process. The first issue is: is there an Article 8</p> <p style="text-align: center;">Page 11</p>
<p>1 It's a very exciting place to be working in. It's very 2 creative, immensely pressured just in that hour or two 3 while the paper is going to bed. There's a huge amount 4 of work to get done. That is very exciting, it's very 5 challenging, but I don't -- I see that but I don't feel 6 I partake in it in the sense of having any creative 7 input. 8 Very often the editor, or whoever's editing the 9 paper, will ask about a headline or ask about use of 10 a photograph or whatever, but it's not my decision. 11 I don't believe the lawyer -- I try and approach it in 12 the same way as if we instructed counsel and asked 13 counsel to give direct advice on this story or that 14 photograph. I try to give the same. Counsel will give 15 advice and the editor can accept that advice or not 16 accept that advice. That is -- being brutal about it, 17 that's what the editor is there, paid for to do. I'm 18 there, paid for, to get the advice to him clearly, under 19 time pressure, but also, once the editor has made the 20 decision, then to assist in every way I can to get that 21 decision so that -- in accordance with the editor's 22 instructions. If the editor says that he wants to take 23 my advice, then to try and make certain that the final 24 copy meets the instructions that I've got from the 25 editor. So that's when the libel reading comes in, and</p> <p style="text-align: center;">Page 10</p>	<p>1 right? And then: is there an Article 10 public 2 interest? 3 But as the Naomi Campbell case shows, that can be 4 a very dry academic issue. If you go and say: how do 5 you actually write an article and get it into the 6 newspaper? What you have then is a question of: what 7 about the headlines, what about this picture, that 8 picture, what about this piece of information? So 9 you're not just -- the editor's not just making 10 a decision about the story as a whole, whether there's 11 a public interest in the story or whether there's not; 12 the editor's also making a decision about particular 13 paragraphs, particularly pieces of information. 14 LORD JUSTICE LEVESON: Whether to put a photograph in, to 15 take the example of the case. 16 A. A classic example. Had the decision been taken not to 17 put the photograph in -- and as I think in one of the 18 courts, at any rate, it was raised: why not use a sort 19 of -- you know, just an ordinary picture of her and not 20 outside her front door? We don't know. But my reading 21 of the House of Lords judgment is it might have gone 22 a different way. It was only 3-2 anyway. It might have 23 gone a different way. So there's one decision on the 24 picture, possibly have a huge impact on the legality of 25 that story. So when I think -- when newspaper lawyers</p> <p style="text-align: center;">Page 12</p>

<p>1 talk about working at the coalface, I think what they 2 mean is it's not an academic issue of whether it's 3 a breach of privacy; it's about words, pictures, 4 headlines. 5 With libel as well, one of the things that -- 6 tabloids are not only brilliantly written; they're 7 brilliantly presented and set out. The headlines hit 8 you. If you look at the tabloid stories that have been 9 presented to you and you're looking through those, I'm 10 sure you will see straight away the impact it makes. 11 They're very professionally produced on the impact, so 12 that again, if you just look at a story by itself and 13 look at it and say, well, is it balanced and does it 14 have "alleged" in it or whatever, you can very easily 15 come to the conclusion -- it's not the same as how it 16 would appear in the paper. When it appears in the paper 17 with a big banner headline and big bold letters and 18 pictures, it sort of has an extra life of its own, and 19 I think that's something, again, that one who is working 20 at the coalface has to be aware of. 21 MR JAY: Thank you. You touch on these matters in 22 paragraph 23. You have very helpfully elaborated upon 23 them. 24 At paragraph 27, you deal with what your main 25 responsibilities as editorial legal adviser are. I've</p> <p style="text-align: center;">Page 13</p>	<p>1 own feeling as a lawyer is that it is wholly -- it's 2 absolutely correct journalism to go to the other side, 3 and a large number of libel problems can be avoided if 4 you go to the other side and you give them a chance to 5 come back and explain the position carefully, and my 6 experience has been that that does make a difference. 7 So I think in the large majority of cases, that happens, 8 and my position on privacy would be that I would always 9 like to -- I always like to advise on what the issues 10 are with regard to prior notification. I always like to 11 know what an editor is going to do, because if an editor 12 decides that prior notification will go ahead, I would 13 regard it as my duty to instruct counsel or solicitors 14 in case there was an injunction, because we don't 15 want -- an injunction would take place very, very 16 quickly indeed, can take place -- in 20, 25 minutes you 17 can be summoned down to the High Court and in such 18 instance, I want to be ahead of the game. I want to 19 have counsel with electronic files or whatever, so I can 20 try and meet that. 21 LORD JUSTICE LEVESON: So the point you're making is: first 22 of all, in by far the great majority of cases, you would 23 pre-notify anyway? 24 A. Yes. 25 LORD JUSTICE LEVESON: But even then, there would only be</p> <p style="text-align: center;">Page 15</p>
<p>1 been asked to ask you just to slow down a bit. 2 A. I'm so sorry, my fault. 3 Q. There's no need to apologise. Everything you are saying 4 is being transcribed. Try and watch the lady over 5 there -- 6 LORD JUSTICE LEVESON: I wouldn't try and watch her if 7 I were you. It's my fault. I was just taken up with 8 the discussion. 9 A. I'm obviously interested and passionate about it, and 10 I'm sorry to get carried away. Yes. 11 MR JAY: The categories of your responsibilities: there's 12 libel reading, dealing with prepublication threats. 13 A. Yes. 14 Q. Can I just touch on one matter, though: 15 pre-notification. 16 A. Yes. 17 Q. Which we've discussed in detail, in particular 18 Mr Mosley's case. 19 A. Yes. 20 Q. How often now does the -- did the Sun newspaper, in 21 particular -- and you have direct knowledge of it -- 22 notify people that they are about to be the subject or 23 target of a particular story? 24 A. Well, the stories that I'm involved in, a large part of 25 the time, a very, very substantial part of the time. My</p> <p style="text-align: center;">Page 14</p>	<p>1 a small number where you'd fear that pre-notification 2 might lead to an injunction or for every one? 3 A. No, it would be a small number, because I think a large 4 amount of the pre-notification is probably on matters 5 that are not private. There would be points of facts to 6 check, and that's quite right. 7 But where there is a privacy issue and advice has 8 been taken on what -- on pre-notification, I would want 9 to know as soon as possible so I can be -- prepare for 10 it, particularly if it was, you know, late, where we 11 were going to get a duty judge, because the perception 12 is whether it's right or wrong is another matter. 13 There's always a feeling that it's easy to sort of carry 14 it over the next day and then it delays to two days to 15 return date or whatever. So I want to be in a position 16 where I have counsel there who can put everything they 17 can in front of the judge at the earliest stage to 18 prevent it being sent over. 19 LORD JUSTICE LEVESON: I'm sorry, I'm going to go down 20 a siding. 21 A. Yes, sir. 22 LORD JUSTICE LEVESON: Is this a problem? You talk about 23 a duty judge who isn't necessarily a specialist media 24 lawyer. 25 A. As a matter of fact, I personally have not found it</p> <p style="text-align: center;">Page 16</p>

<p>1 a problem. We had, last year on the Sun, quite a number 2 of injunctions where we did pre-notify. They were 3 privacy injunctions and I don't have any complaint about 4 the judges we went in front -- we were put in front of 5 judges very quickly, but no. I'm talking about 6 a perception, I think, editorially, that you don't 7 get -- you might, with a duty judge, have somebody who 8 tends to pass it over to the next day. It's not been my 9 experience.</p> <p>10 LORD JUSTICE LEVESON: I don't want you to be defensive 11 about it.</p> <p>12 A. Yes.</p> <p>13 LORD JUSTICE LEVESON: I have a judicial job to go back to 14 and therefore I'm actually quite interested, as you 15 raise it, in your perception of the way in which the 16 courts respond to these things.</p> <p>17 A. I suppose it always depends upon what material on the 18 privacy case is put in front of the judge at what stage. 19 Every case is different. Every case is going to be an 20 intense focus on the facts. I personally don't have 21 a complaint about the duty judge system, no, sir.</p> <p>22 MR JAY: Can I just ask you a question which looks at the 23 other side of the coin: it might be said that there are 24 situations where there is a public interest in not 25 pre-notifying the subject or the target. Are you able</p> <p style="text-align: center;">Page 17</p>	<p>1 on conduct and you give one example. How often does 2 that happen, that you're asked to give ethical advice in 3 concrete situations?</p> <p>4 A. Of course, the example here, sir, would be not simply an 5 ethical point; it would be a legal point. We would have 6 to be extremely careful about a journalist purchasing 7 drugs. We did a story towards the end of last year, an 8 expose when a journalist purchased drugs -- I think 9 exactly on the point, actually -- and I think that 10 person subsequently has been prosecuted. Not the 11 journalist, but the person who the drugs were purchased 12 from.</p> <p>13 Q. You pick this up again, I think, in paragraph 29, (i), 14 where you deal with exposing those who use or supply 15 drugs. You state: 16 "Subterfuge may be used and drugs purchased by or on 17 behalf of the journalist, which raises certain legal 18 issues." 19 I suppose one of the issues is that possession of 20 illegal drugs, for whatever reason or purpose, is in 21 itself, by definition, illegal?</p> <p>22 A. Yes.</p> <p>23 Q. How do you avoid that obvious point, as it were?</p> <p>24 A. Well, in such circumstances, I'm insistent that the 25 journalist goes straight from the purchasing of the</p> <p style="text-align: center;">Page 19</p>
<p>1 to assist the Inquiry with any concrete examples of 2 that, or perhaps if you're not, give your opinion as to 3 whether there is ever a public interest in not 4 pre-notifying?</p> <p>5 A. I'm so sorry, sir. Off the top of my head, I can't put 6 an example to you. I suppose that it's possible that 7 there could be examples of such a public interest. 8 I think it's undoubtedly true that with regard to 9 perhaps some celebrities, there is a perception, 10 again -- and I don't know because I'm getting it 11 hearsay, second-hand, if you like -- that some agents 12 will not respond or will put the story around to kill 13 your story; in other words, that if you go to 14 a celebrity agent early, what will happen is the story 15 will then be leaked to the other newspapers in a more 16 favourable manner, and that certainly is a perception. 17 Whether that amounts to -- I don't think that amounts to 18 a public interest in not going to them, but it may 19 amount to a reason why not to go to them.</p> <p>20 Q. Thank you. I'm not going to cover all the matters in 21 your statement, Mr Walford.</p> <p>22 A. Right.</p> <p>23 Q. We, of course, have read the statement carefully. But 24 I do have a point on paragraph 27 (viii), which is on 25 page 07933. From time to time, you are asked to advise</p> <p style="text-align: center;">Page 18</p>	<p>1 drugs -- and obviously they don't know at that stage 2 whether they've purchased the drugs -- to a testing 3 house -- I like it to be done straight away -- and the 4 drugs are left at the testing house. I think for 5 prosecuting purposes, the drugs are not destroyed, 6 obviously, so that if later a prosecution needs to take 7 place, it can do.</p> <p>8 I also make clear that if the police come to us, we 9 must be in a position to be able to co-operate fully 10 with the police, and so we are acting as responsibly as 11 we can in that.</p> <p>12 Q. Have you had situations -- and we're talking generally 13 now -- where the method of subterfuge used or about to 14 be used is not illegal but it may be unethical and 15 therefore you have to weigh up that fact against the 16 public interest in the ultimate story? Do you encounter 17 that?</p> <p>18 A. I'm sure I must, sir, but I can't think of an example 19 straight off.</p> <p>20 Q. But in general terms, how is the balancing exercise 21 conducted in such a situation?</p> <p>22 A. I think that if it were an ethical issue rather than 23 a legal issue, I think that would probably be something 24 that the editor and the managing editor might look at, 25 the ethical matter, whether that came under the PCC</p> <p style="text-align: center;">Page 20</p>

<p>1 code. I would hope that I would have an input into it, 2 but it would not be my ultimate decision. 3 If there was a legal element to it, then I think 4 I would want to have an input into that. 5 Q. By legal, illegal, you mean contrary to the criminal 6 law; is that right? 7 A. Well, if it was contrary to the civil law as well. If 8 it was going to be a breach of confidence or whatever, 9 that would be a matter that I think the lawyer would 10 advise on, yes, sir. 11 Q. Although you make a distinction between that, which 12 involves intellectual property rights, and privacy and 13 libel, where you made it clear the ultimate decision is 14 the editor's; is that right? 15 A. I'm so sorry if I've given the impression in any way 16 that the ultimate decision on anything is mine. It's 17 not. The ultimate decision on anything going into the 18 paper or anything done by people in the newspaper is 19 going to be for editorial. I'm so sorry. 20 LORD JUSTICE LEVESON: No, you've been quite clear. You 21 provide the risk and they make the decision. 22 A. Absolutely, sir. But obviously -- 23 LORD JUSTICE LEVESON: And carry the responsibility for it. 24 A. Yes. With regard to criminal matters, obviously the 25 editor is going to come and say, "I want this handled</p> <p style="text-align: center;">Page 21</p>	<p>1 have done with regard to training over the years, and 2 I think that -- I think there was a great deal of 3 emphasis on the PCC and the PCC code. I don't think 4 there was probably, in hindsight, sufficient emphasis 5 put on legal matters. There was some, but I think the 6 situation now has much improved. We have a great deal 7 more legal training, so that is has been corrected, but 8 I think, looking back, it was something that perhaps 9 should have been better. 10 Q. Did you hear rumours, at about the time of the Goodman 11 case or thereafter, that phone hacking wasn't limited to 12 the News of the World but might have encompassed the 13 Sun? 14 A. People -- I didn't hear rumours, but people speculated 15 and wondered whether that had happened. I was very 16 concerned that it should not have happened, and I did 17 speak to people and ask people who I thought might know, 18 and ask and say, "Had it happened?" and I was assured 19 that it hadn't, and I can say on oath to you that I've 20 never seen anything in the Sun which has made me think 21 that it has been happening, and if it has, then I would 22 be very surprised and very shocked. But I have no 23 reason to believe that it has, sir. 24 Q. You told us that you spoke to people -- I'm not going to 25 ask you who they were, but people who would or ought to</p> <p style="text-align: center;">Page 23</p>
<p>1 entirely by the lawyers and I expect it to be done in 2 such a way that the journalist is not arrested", and 3 that's why I would have an input directly onto it. 4 MR JAY: Thank you. May I ask you a question about 5 paragraph 33. 6 A. Yes. 7 Q. Here you're on the issue of training. 8 A. Yes. 9 Q. You point out that: 10 "From time to time the company organises, through 11 its managing editors, training for journalists, often in 12 conjunction with PCC. Following the Goodman case, 13 training of the News of the World was arranged on legal 14 issues as well as by the PCC." 15 Presumably, though, that training covered the Sun as 16 well, did it not, Mr Walford? 17 A. No. That was training specifically onto the 18 News of the World with regard to issues, so it was 19 organised and run by the managing editor of the 20 News of the World. 21 The Sun's training has been organised through the 22 managing editor's department, and that has very largely 23 been on the PCC code, and with the assistance of the 24 PCC. 25 I think that, looking back, there was more we should</p> <p style="text-align: center;">Page 22</p>	<p>1 have known, and they gave you assurances to the effect 2 that these practices had not taken place? 3 A. Yes. 4 Q. Thank you. Can I ask you a general question. I'm 5 moving now to paragraph 51, Mr Walford. This is vetting 6 of sources. 7 A. Yes. 8 Q. Responsibility there doesn't lie with you, of course, 9 but with the editorial team, but what input, if any, do 10 you have in seeing whether or not sources have been 11 checked or the story otherwise stood up? 12 A. If the system works properly, the lawyer, be it me or 13 the night lawyer, will have an input onto that. The 14 concentration is not so much where the original source 15 comes from. That's partly that -- with regard, for 16 example, to libel. Talking about working at the 17 coalface, one's primary concern is: what material is 18 there on the record to prove whatever the meanings are 19 in that story? 20 LORD JUSTICE LEVESON: Yes, because a source that is 21 undisclosed and will not be disclosed has little 22 evidential value. 23 A. Absolutely right, sir. That's absolutely right. So my 24 concentration is always going to be on what material 25 there is on the record that I can rely on to prove this</p> <p style="text-align: center;">Page 24</p>

<p>1 meaning. I make an assessment on what I think the 2 meaning is and I then say, "What material is there to 3 prove this meaning?" and if there isn't the material 4 there, then I say, "Is it sensible to publish this 5 meaning?" 6 MR JAY: In relation to each sort of case you're looking at, 7 do you keep a file or a written record which records (a) 8 your assessment of the case, and (b) the underlying 9 evidence that it exists? 10 A. No. At no time in my career have I made notes about the 11 legal advice that I've given each night. I only -- 12 I don't think it would really be possible. There's so 13 much material that comes in. There's so much work. 14 One remembers that the system itself does have legal 15 marks written on it because -- the leg-in basket will 16 have legal marks on it, so there is a record on most of 17 them somewhere, but no -- 18 LORD JUSTICE LEVESON: What you say "legal marks", just 19 explain what you mean by that, would you? 20 A. Having discussed the case with an editor or news editor 21 or whatever, one would then -- the hard -- a copy is put 22 into the machine and one then simply types out "delete 23 this" or "add that" or a note to the subeditor: "For 24 Pete's sake, don't do X." 25 LORD JUSTICE LEVESON: Oh, I see.</p> <p style="text-align: center;">Page 25</p>	<p>1 it. 2 LORD JUSTICE LEVESON: For the biggest stories, that may be 3 rather difficult, mightn't it? I mean in the sense that 4 in one sense you're remembering something, but you may 5 have heard during the course of the day people have 6 said, "Oh, well, this is X years ago. How could 7 I possibly remember this conversation or that detail?" 8 Yet it actually might be quite important to demonstrate 9 that proper consideration was given to the public 10 interest if there is a subsequent challenge. 11 A. Yes, I take that point on board, and I think the PCC 12 code has recently changed with regard to matters on 13 that, and I think it may be something we have to look at 14 and consider. I'm just aware of the practicalities of 15 it, and articles that are published -- afterwards, you 16 tend to have complaints relatively quickly, sir. 17 Obviously there's a one-year limitation with libel, so 18 matters tend to escalate fairly quickly, so it's 19 normally possible to find out -- 20 LORD JUSTICE LEVESON: The trouble with that is 21 ex post facto rationalisation. You do something, you 22 then get a complaint and you think, "My God, I've got 23 this complaint, so why did I decide this?" So then you 24 run through a whole range of reasons why you might 25 possibly have reached the conclusions you actually</p> <p style="text-align: center;">Page 27</p>
<p>1 A. Or very often, one puts certain paragraphs and one says, 2 "These are legal musts", or one says at the top of the 3 copy: "For goodness sake, balance this out", or: "Don't 4 just run ..." Invariably the copy is much longer than 5 the story that appears, and what you don't want is the 6 other side of the person's -- right down at the bottom 7 just gets lost or cut out. It's not deliberate but it 8 happens, and it's things like that that -- those are the 9 legal marks that would be made, sir. 10 MR JAY: This is my final question, and I suspect I know the 11 answer to it: when it comes to an editorial assessment 12 of either libel risk or privacy -- and in privacy cases 13 we're weighing up two Convention rights or public 14 interest against private interest, or however you put 15 it -- is there a document or audit trail which one could 16 look at after the event which could demonstrate how the 17 risk has been assessed or where the public/private 18 interest balance as fallen? 19 A. No, there isn't. These are decisions that are -- and 20 debates that take place from sort of 6 o'clock to 21 7 o'clock to 8 o'clock, standing at the back bench of 22 the newspaper and looking at copy, looking at proposed 23 headlines and things. There is no record of those. To 24 a certain degree, you have to rely on trust that 25 everyone afterwards, if a problem arose, would remember</p> <p style="text-align: center;">Page 26</p>	<p>1 reached, but it's all rather ex post facto. 2 A. I think it's called honest opinion now rather than fair 3 comment, but I recognise that. 4 LORD JUSTICE LEVESON: Yes. 5 MR JAY: I think you're saying, Mr Walford, that given how 6 busy you are, in practical terms it's very difficult to 7 achieve such a gold standard unless you had someone 8 assisting you taking a note, or someone assisting the 9 editor taking a note, so that decisions could be 10 contemporaneously recorded; is that right? 11 A. I think that's probably -- 12 LORD JUSTICE LEVESON: Or there has to be some sort of 13 system which doesn't presently exist? 14 A. As I've mentioned, there is the leg-in basket, but 15 otherwise, the system, no. 16 LORD JUSTICE LEVESON: But, of course, your legal marks will 17 be privileged? 18 A. They will be. 19 LORD JUSTICE LEVESON: So nobody will see those at all 20 unless privilege is waived. It's actually to try to get 21 to -- it's to try to encourage the decisions to be made 22 in the right order. 23 A. Yes. 24 LORD JUSTICE LEVESON: I appreciate editors will think: 25 "Well, this is what a lawyer would say, isn't it?" You</p> <p style="text-align: center;">Page 28</p>

<p>1 know: "I'm too busy trying to produce a newspaper which 2 is interesting, which is on top of the facts and all the 3 rest of it, without worrying about what's going to 4 happen later." But the question is: how we do develop 5 a system that is fair both to the press, which 6 I recognise is critical, but also to everybody else? 7 A. Mm. I can see the problem. I think there is 8 a practical problem there behind it, but practical 9 problems can be overcome and it may be they need to be, 10 but it's certainly -- it's not something I'm afraid I've 11 given sufficient thought to. I will do. 12 LORD JUSTICE LEVESON: Then you're encouraging me to ask the 13 question -- this is the second time you've done it. If 14 you will do and you do have any thoughts, then I'd be 15 very interested to hear them. 16 A. Yes, I will. 17 LORD JUSTICE LEVESON: Thank you. 18 MR JAY: Thank you. Those are all the questions I have for 19 Mr Walford. 20 LORD JUSTICE LEVESON: Thank you very much. 21 MR JAY: Sir, would you be prepared to break now for fifteen 22 minutes so I can have a short discussion with the next 23 witness? 24 LORD JUSTICE LEVESON: Yes, certainly. 25 MR JAY: Thank you.</p> <p style="text-align: center;">Page 29</p>	<p>1 2009; is that right? 2 A. Correct. 3 Q. Before then you worked at a number of papers. You've 4 been at the Sun since 1996; is that correct? 5 A. Yes. 6 Q. Like some of your predecessors, you have been editor of 7 Bizarre, which we know is the showbiz column. You held 8 that post until 2003, I think, and then you worked up 9 through features, deputy editor in 2007 and in 2009 10 editor. Is that correct? 11 A. That is correct. 12 Q. You make it clear in your statement that ethical conduct 13 for Sun journalists is taken very seriously, including 14 adherence to the code, and the code is now part, 15 I think, of contracts of employment; is that right? 16 It's written into staff contracts, you tell us in 17 paragraph 5. 18 A. Yes, yes. 19 Q. Can you tell us a little about the training sessions or 20 seminars in paragraph 7? All journalists are taken 21 through a number of real life PCC complaints and those 22 are discussed as cases which raise public interest 23 against private rights issues; is that right? 24 A. Yes. They've been in several times and gone through 25 workshops with the staff.</p> <p style="text-align: center;">Page 31</p>
<p>1 (2.47 pm) 2 (A short break) 3 (3.12 pm) 4 LORD JUSTICE LEVESON: Yes. 5 MR JAY: Our next and last witness for today is Mr Dominic 6 Mohan, please. 7 MR DOMINIC JAMES MOHAN (sworn) 8 Questions by MR JAY 9 MR JAY: Sit down please and make yourself comfortable. 10 Your full name, please? 11 A. Dominic James Mohan. 12 LORD JUSTICE LEVESON: Mr Mohan is the first of the editors 13 who allowed me to enter his newsroom before the Inquiry 14 started, so I'm publicly happy to thank him for the 15 courtesy which he and his staff showed me when I came. 16 Thank you. 17 MR JAY: Mr Mohan, your statement, appropriately, is under 18 tab 1 in file 2. It again is dated 14 October 2011. 19 A. Yes. 20 Q. There is a statement of truth at the end. You've signed 21 it and dated it, and is this your formal evidence to the 22 Inquiry? 23 A. It is. 24 Q. The position, Mr Mohan, is that you've been editor of 25 the Sun for two years and four months, since August</p> <p style="text-align: center;">Page 30</p>	<p>1 Q. Right. How often is it that there is liaison with the 2 PCC prior to publication of a story? 3 A. I wouldn't say every day, but perhaps almost every other 4 day. This is done by Fergus Shanahan, the executive 5 editor, and on occasions Richard Caseby, the managing 6 editor. They have good relationships with the PCC and 7 will often speak to them on a very regular basis. 8 Q. In practical terms, though, why aren't you, as editor, 9 involved in those discussions? 10 A. I delegate those duties to the executive editor. 11 I think that's fairly normal practice. 12 Q. Okay. 13 A. But I do take a close involvement in the discussions and 14 the outcome. 15 Q. Okay. I'm going to ask you a little bit later about 16 paragraph 8 and a PCC complaint which you deal with. In 17 paragraph 9 you deal with training sessions. I think we 18 can take those as read. There have certainly been 19 recent sessions on the Bribery Act, and you're 20 preparing -- or you were preparing in October, and 21 presumably these sessions have taken place now -- 22 sessions on various discrete issues: suicide, HIV Aids 23 and Travellers and gypsies? 24 A. I believe they're taking place this year. 25 Q. The answer to this question is no doubt obvious, but</p> <p style="text-align: center;">Page 32</p>

<p>1 what is the purpose of these sessions?</p> <p>2 A. Just to remind people of their responsibilities and the</p> <p>3 accuracy of their reporting. I mean, particularly with</p> <p>4 Broadmoor, there's been a number of issues with language</p> <p>5 that's been used to describe patients within the</p> <p>6 hospital, and we thought it was important to remind</p> <p>7 people on all parts of the paper their responsibilities</p> <p>8 and the language that should be used.</p> <p>9 Q. The same obviously applies, does it not, to Travellers</p> <p>10 and gypsies?</p> <p>11 A. Yes.</p> <p>12 Q. You deal with the role of lawyers in paragraph 10 and</p> <p>13 we've heard, of course, from Mr Walford, who's told us</p> <p>14 all about that.</p> <p>15 Internal policies. This is largely covered in</p> <p>16 written submissions and in documents we've seen. Can</p> <p>17 I just touch on paragraph 12. September 2011, a new</p> <p>18 process for paying cash to sources.</p> <p>19 A. (Nods head)</p> <p>20 Q. Can you tell us, please, why there was thought to be</p> <p>21 a need to bring in a new system in September 2011?</p> <p>22 A. We just thought it would be sensible and to show good</p> <p>23 governance by tightening up the procedure in light of</p> <p>24 what happened at the News of the World.</p> <p>25 Q. The procedure now involves four signatures; is that</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. But if there weren't two versions, how was it that the</p> <p>2 guilty verdict version went on the website for a period</p> <p>3 of time?</p> <p>4 A. I'd have to look into the details of that, I'm afraid.</p> <p>5 I believe it was a very quick snatch of a story. It</p> <p>6 wasn't a full version. It was like a breaking news,</p> <p>7 a few paragraphs.</p> <p>8 Q. Okay. Can I ask you about subparagraph (6), readers.</p> <p>9 You say:</p> <p>10 "The Sun's readers are also a great barometer and</p> <p>11 I pay close attention to their letters, phone calls and</p> <p>12 emails."</p> <p>13 Can you give us a flavour, please, of two things.</p> <p>14 First of all, in terms of quantity, how many feedback</p> <p>15 are you getting from your very substantial readership?</p> <p>16 A. I would say email-wise probably 2 to 3,000 a week, and</p> <p>17 phone calls -- it will depend on the nature of the</p> <p>18 story, but often I will ask the news editor: "Have we</p> <p>19 received a lot of calls on this story? Is it creating a</p> <p>20 lot of interest or criticism, for instance?" And I use</p> <p>21 that as a soft control to correct myself.</p> <p>22 I'll give you an example of that, actually. During</p> <p>23 the riots, I prepared a front page which had a list of</p> <p>24 individuals who had been arrested in the riots, because</p> <p>25 the variety of their professions was quite fascinating,</p> <p style="text-align: center;">Page 35</p>
<p>1 correct?</p> <p>2 A. It does.</p> <p>3 Q. Okay, discipline, paragraph 13. You have disciplinary</p> <p>4 procedures if standards are not met. You've identified</p> <p>5 one case in 2007.</p> <p>6 Then in October of 2011, a member of your online</p> <p>7 staff was sent a warning letter about publishing the</p> <p>8 wrong verdict in the Amanda Knox appeal against her</p> <p>9 convictions on the Sun's website. A point was made</p> <p>10 about this in relation to the Daily Mail -- you may not</p> <p>11 have seen this in evidence -- that they had two versions</p> <p>12 of the story ready and unfortunately the Italian verdict</p> <p>13 came out quite late in the evening, as you know, either</p> <p>14 guilty or not guilty, and the wrong one was put up on</p> <p>15 the website. Is it the same phenomenon in relation to</p> <p>16 the Sun or a different one?</p> <p>17 A. I think it was a very short version of the story that</p> <p>18 had been prepared and somebody pressed the button as</p> <p>19 a result of it flashing up on Sky News, I believe, so</p> <p>20 I reprimanded the individual concerned and said it was</p> <p>21 a slip in standards.</p> <p>22 Q. Right. This may or may not be unusual. Had two</p> <p>23 versions of the story been prepared, depending on the</p> <p>24 outcome?</p> <p>25 A. I don't think so. I can't be sure.</p> <p style="text-align: center;">Page 34</p>	<p>1 I felt, because there was a -- one of them was</p> <p>2 a lifeguard and another was a teaching assistant, who</p> <p>3 I described as a teacher in the headline, and I received</p> <p>4 a number of complaints the following day from readers</p> <p>5 who felt it was unfair to describe a teaching assistant</p> <p>6 as a teacher for the purposes of a headline. So I noted</p> <p>7 that and won't do it again.</p> <p>8 Q. I know it would be very difficult to say, but the</p> <p>9 balance between favourable comment and</p> <p>10 criticism/unfavourable comment, are you able in</p> <p>11 percentage terms to give us a feel or steer on that? It</p> <p>12 may be too general a question.</p> <p>13 A. I wouldn't know. I mean, it would depend on an</p> <p>14 individual day or an individual front page or story,</p> <p>15 I would think.</p> <p>16 Q. In your experience as editor, have you, on occasion, had</p> <p>17 experience of stories which have -- particular stories</p> <p>18 which have attracted a lot of criticism?</p> <p>19 A. As editor or just in my career at the Sun?</p> <p>20 Q. Maybe look more widely then. Your career at the Sun,</p> <p>21 which goes back some period of time now.</p> <p>22 A. I seem to remember -- I wasn't involved in the</p> <p>23 production of the paper, but we did print a picture of</p> <p>24 a footballer who died on the pitch and he was lying on</p> <p>25 the pitch with his eyes open and we received quite a lot</p> <p style="text-align: center;">Page 36</p>

<p>1 of criticism about that, and I've learned from that 2 mistake and wouldn't do it again. 3 LORD JUSTICE LEVESON: Could I just pick up on that? Am 4 I right in remembering, on actually reading the very 5 short note I have, that Mr McKenzie suggested that you 6 did have a readers' ombudsman who unfortunately died and 7 wasn't replaced because there was no need for him? Was 8 that his evidence? Am I right about that? And is that 9 the position? 10 A. I think he did say that, but he -- we did have an 11 ombudsman when I first joined the Sun, but those duties 12 were moved across to the managing editor's office 13 because it was felt that that would be more appropriate 14 and I think that we felt that those duties could be 15 performed by the managing editor. But it wasn't 16 necessity. 17 LORD JUSTICE LEVESON: Is that what happens now? 18 A. Yes. It goes to the managing editor or the executive 19 editor. 20 MR JAY: Yes. 21 LORD JUSTICE LEVESON: So you don't have, as some papers 22 have, a readers' editor who is independent of the 23 editorial line? 24 A. No. Although I was having discussions with my senior 25 executive recently about perhaps appointing an</p> <p style="text-align: center;">Page 37</p>	<p>1 LORD JUSTICE LEVESON: I'm sorry, can I interrupt again? 2 Let me just understand. Editor, managing editor, 3 executive editor. What are their respective roles? 4 A. Well, the managing editor's office, they will obviously 5 deal with PCC issues and maybe get involved in legal 6 issues. The managing editor was responsible for a lot 7 of -- putting together a lot of the Bribery Act 8 training, for instance. But he'll also be in control of 9 the budgets, so if we're over budget, he will issue 10 edicts to cut back here, cut back there, et cetera, and 11 also liaise closely with the executive arm of the 12 organisation. 13 LORD JUSTICE LEVESON: The executive editor? 14 A. That's Fergus Shanahan. He deals -- he actually also 15 writes our leader column in the paper, as well as 16 dealing with PCC complaints, so it's a dual role. 17 LORD JUSTICE LEVESON: And the editor is responsible for 18 what goes in the paper? 19 A. Yes. 20 LORD JUSTICE LEVESON: Got that. 21 MR JAY: In terms of the corporate hierarchy, how many 22 dealings or what are your dealings, if any, with 23 Mr James Murdoch when he was chief executive officer? 24 A. Yeah, I mean, I see him from time to time, but he 25 doesn't really have a huge involvement in the newspaper</p> <p style="text-align: center;">Page 39</p>
<p>1 ombudsman, and that's in discussion. 2 LORD JUSTICE LEVESON: Do you see a value in that or -- 3 I don't want you to disclose commercially sensitive 4 issues, but I'm interested in your -- I think you are 5 the first serving editor that I've heard from, so I'm 6 afraid you're going to get lots of questions about these 7 issues. 8 A. I think it could be useful. I think that in terms of 9 some internal self-regulation, it could be useful in 10 dealing with complaints and actually dealing with 11 them -- we would be the first hurdle to those 12 complaints, rather than perhaps them going to the PCC. 13 I think it could be helpful. 14 MR JAY: I think the evidence was that the ombudsman, 15 Mr Donlan, that was his sole activity, as it were, in 16 the five or six years or so that he occupied that 17 position before his death, but now, of course, the 18 position is that the managing editor is acting as 19 readers' editor or ombudsman, and that's amidst a whole 20 range of other responsibilities. That would be right, 21 wouldn't it? 22 A. Yes, but the managing editor doesn't work in isolation. 23 He has support staff with him and works closely with the 24 executive editor. 25 Q. Okay. At paragraph 18, you deal with --</p> <p style="text-align: center;">Page 38</p>	<p>1 on a day-to-day basis at all. 2 Q. We heard from Mr McKenzie this morning that he had 3 frequent dealings with Mr Rupert Murdoch. Do you? 4 A. I do, yes. 5 Q. Could you tell us a little bit about that? First of 6 all, how often, and secondly, about what? 7 A. It varies. I mean, sometimes he might ring several 8 times a week. Other occasions I may not hear from him 9 for a month or two. But we talk about a variety of 10 issues. He's obviously interested in the stories of the 11 day and he's very -- you know, he's a journalist at 12 heart and will be very curious to know what I'm going to 13 put on the front page, if I've come up with a good 14 headline, et cetera. I mean, last time I spoke to him, 15 we discussed the John Terry racism issue that was quite 16 a big story in the press at the time and he was 17 interested in that. 18 On other occasions, we might talk about the Sun's 19 digital products -- the Ipad application he's very 20 interested in and is often annoyed at how long it takes 21 him to download -- but he'll also take a lot of 22 interest, for instance, in traffic to the Sun's website, 23 et cetera. 24 Q. Thank you. Does he have any influence over editorial 25 content?</p> <p style="text-align: center;">Page 40</p>

<p>1 A. No, he's never tried to interfere. 2 Q. Thank you. Can I move forward to paragraph 18 of your 3 statement, Mr Mohan. You deal with corrections -- 4 A. Yes. 5 Q. -- in relation to complaints. You say this: 6 "Corrections are never placed further back in the 7 newspaper than the original article except for those 8 connected with page 1 stories, where the correction is 9 published on page 2." 10 A. I think that's usually the case, yes. 11 Q. Many people say, and some have said to this Inquiry: 12 "Well, if the original offending article [put in those 13 terms] was on page 1, should not the correction be on 14 page 1?" Would you like to comment on that? 15 A. I've obviously heard those discussions and there's an 16 example I quote in my statement where I say that -- 17 there was much discussion about a story that came in 18 about a complaint that had been made about a judge. 19 There'd been an allegation to the office of judicial 20 complaints by a member of the public who claimed that 21 a judge had been drinking during a recess. I was 22 obviously aware of the sensitivities of that story and 23 spoke about it at length to Mr Walford. We chose to run 24 the story on the front page, but then agreed to publish 25 a follow-up story when the verdict in the case had been</p> <p style="text-align: center;">Page 41</p>	<p>1 chief executive officer. The position in the past, 2 though, was more flexible, I think; is that right, 3 Mr Mohan? 4 A. Yes. Private investigators have been used in the past 5 without the permission of the chief executive officer, 6 but now there are new controls in place. 7 Q. Have you in your career at the Sun ever used private 8 investigators? 9 A. Not to my knowledge, no. 10 Q. Even to discover ex-directory numbers, for example? 11 A. I'd make a distinction. I've used search agents in the 12 past, but I wouldn't describe them as private 13 detectives. 14 Q. Right. And can the search agents be used at 15 News International even now, with or without the express 16 permission of the chief executive officer? 17 A. Yes, search agents can. There is a distinction. 18 LORD JUSTICE LEVESON: I've got to be a bit careful about 19 this, because you may remember that Mr Webb reclassified 20 himself from private detective to journalist, apparently 21 without a great deal of difficulty, and then everybody 22 said, "We don't employ private investigators; we only 23 employ journalists." Can we strip that sort of language 24 out? I don't think you said that, but you're not 25 suggesting that you've recast people who did different</p> <p style="text-align: center;">Page 43</p>
<p>1 reached, and he was in fact cleared, so after 2 negotiation via the PCC with the judge, we ran 3 a headline on the front page and a clarifying story on 4 page 2 the following day. 5 Q. We have the clarifying story, if you look at your 6 exhibit bundle. It's the first page of the exhibit 7 bundle, our page 10674. 8 A. Sorry, I don't know if I have that. 9 Q. That should be under tab 2. Do you have it? 10 A. Oh yes, here's the -- yes. 11 Q. "Judge in the clear on booze" is the -- we can see 12 that's page 2. We don't have the front page reference 13 to that. 14 A. There was just a small blurb on the front page which 15 said: "Judge is cleared." I think the judge was very 16 happy with the way we dealt with it and I think he asked 17 to pass on his thanks from the PCC. 18 Q. Okay. So the position was cleared with the judge, as it 19 were? 20 A. Yes. 21 Q. Thank you. Can I deal with the issue of private 22 investigators, paragraph 19. 23 A. Yes. 24 Q. The position now is that they can no longer be used at 25 News International without the express permission of the</p> <p style="text-align: center;">Page 42</p>	<p>1 jobs as journalists so that they don't fall within 2 the -- 3 A. No, no. I'm talking about legitimate search agencies 4 who will source legally held databases, birth, death, 5 marriage certificates, electoral roll checks, legal 6 work. 7 Q. Paragraph 20: 8 "The responsibility for checking sources of 9 information lies firstly with the reporter ..." 10 Then ultimately with you. How often will you know 11 in general terms the nature of the source? In other 12 words, if one is dealing with a celebrity story, for 13 example, whether it's someone chose to the celebrity, 14 whether it's their agent, whether it's the celebrity 15 himself or whether it's a fellow journalist? Will you 16 know in general terms the category in which the source 17 falls? 18 A. Well, it depends on each individual story and case, but 19 yes, I'll often ask what area a source might have come 20 from, whether that source has been used before and has 21 a good track record, whether it's from a freelance 22 journalist with a good reputation. 23 Q. Okay. Then you say towards the end of paragraph 20 that 24 if a journalist needs guidance on any ethical matter, 25 they consult their desk head, managing editor, and they</p> <p style="text-align: center;">Page 44</p>

<p>1 consult you. How often does that happen?</p> <p>2 A. Consulting with me or with the managing editor?</p> <p>3 Q. Well, with the managing editor, who will then consult</p> <p>4 you, if necessary?</p> <p>5 A. Quite often, actually. If we think there's a PCC issue</p> <p>6 arising or a privacy issue, then often -- you know,</p> <p>7 I must say that a lot of my working day is spent having</p> <p>8 these kind of discussions, because if an issue surfaces</p> <p>9 in morning news conference, then often we'll come back</p> <p>10 to it throughout the day and check the ethical, legal</p> <p>11 position.</p> <p>12 Q. Fair enough. Then over the succeeding paragraphs of</p> <p>13 your statement you deal with sources and tipsters.</p> <p>14 I think we're going to take those as read, Mr Mohan.</p> <p>15 LORD JUSTICE LEVESON: While you find the next question, let</p> <p>16 me just follow up on that. You heard me ask Mr Walford</p> <p>17 some questions about identifying the public interest.</p> <p>18 If you're coming back to a question because you're</p> <p>19 thinking about it -- and I can see the iterative process</p> <p>20 that that might involve, you ask some more questions,</p> <p>21 you reach some views -- is there a problem about</p> <p>22 providing some sort of audit trail, some sort of piece</p> <p>23 of paper that deals with your thinking at the time?</p> <p>24 A. I think that would be difficult just because of the</p> <p>25 amount of these discussions that go on. I mean, you'd</p> <p style="text-align: center;">Page 45</p>	<p>1 the organisation comes from the top, and in the</p> <p>2 newspaper that would be from the editor usually. Does</p> <p>3 that proposition hold good in relation to the Sun, in</p> <p>4 your opinion, that the culture comes from you?</p> <p>5 A. Yes, and the people that I've put around me, my senior</p> <p>6 team. I feel that we have a similar ethos of what the</p> <p>7 paper should be and hopefully that also comes across in</p> <p>8 the pages of the paper itself.</p> <p>9 Q. How, if at all, has the culture of the Sun changed,</p> <p>10 both -- one is looking at the time since you've been</p> <p>11 working there, which is now 15 or 16 years, I think, and</p> <p>12 since you've been editor.</p> <p>13 A. I think I've seen it evolve. I mean, there's been great</p> <p>14 obviously strides in privacy law and other</p> <p>15 considerations like the Bribery Act, so -- I've always</p> <p>16 felt a newspaper is a sort of living, breathing organism</p> <p>17 that evolves, and actually I think that I've seen</p> <p>18 mistakes made over the years and I've learnt from those</p> <p>19 mistakes.</p> <p>20 I'll give you an example of that. When a story was</p> <p>21 run pre my editorship about Charlotte Church's pregnancy</p> <p>22 and she was under 12 weeks, there was a PCC adjudication</p> <p>23 upheld, and as a result of that adjudication, I've</p> <p>24 obviously not printed stories about females being under</p> <p>25 12 weeks pregnant. I'll give you an example of that.</p> <p style="text-align: center;">Page 47</p>
<p>1 need a sort of permanent secretary or stenographer or</p> <p>2 something to actually -- these discussions are evolving</p> <p>3 throughout the day --</p> <p>4 LORD JUSTICE LEVESON: Do all stories carry privacy and PCC</p> <p>5 implications?</p> <p>6 A. It feels like it at the moment. Every -- at the moment,</p> <p>7 it feels almost every story has to be considered in</p> <p>8 terms of the Bribery Act, privacy and of course the PCC,</p> <p>9 so -- I mean, there are many, many discussions happening</p> <p>10 in the white heat of a news operation.</p> <p>11 MR JAY: I move forward to paragraph 29, please, Mr Mohan.</p> <p>12 A. 20?</p> <p>13 Q. 29, where you say:</p> <p>14 "As editor I've always been determined to foster</p> <p>15 a culture of honesty, integrity and high ethical</p> <p>16 standards at the Sun."</p> <p>17 How have you tried to foster those qualities?</p> <p>18 A. I think just on -- an editor can -- their contact on</p> <p>19 a day-to-day basis with their staff, so whether that be</p> <p>20 in morning news conference, during my features</p> <p>21 conferences, during my lunchtime plot meetings or my</p> <p>22 presence on the back bench in the newsroom on a daily</p> <p>23 basis, I think people know what I expect of them and</p> <p>24 know what standards and ethics that I stand by.</p> <p>25 Q. It might be said in many organisations the culture of</p> <p style="text-align: center;">Page 46</p>	<p>1 Last year, the Sun had a story about Danny Minogue, the</p> <p>2 X Factor host, being pregnant. I personally spoke to</p> <p>3 her representatives. They told me she wasn't yet 12</p> <p>4 weeks, so I obviously decided not to run the story,</p> <p>5 despite its obvious commercial appeal. If a story about</p> <p>6 Danny Minogue is on the front page of a newspaper, the</p> <p>7 sales will probably go up. It was run by another</p> <p>8 newspaper, and they did have a PCC complaint upheld.</p> <p>9 LORD JUSTICE LEVESON: Do you think they might think it's</p> <p>10 worth it? Because the 12 weeks thing is quite clear,</p> <p>11 isn't it? I mean, of all these issues -- some of them</p> <p>12 are tremendously difficult and balanced and nuanced, but</p> <p>13 12 weeks is comparatively straightforward, isn't it?</p> <p>14 A. Sure.</p> <p>15 LORD JUSTICE LEVESON: So why would a newspaper publish</p> <p>16 a story in flagrant breach of that obligation under the</p> <p>17 code, if being the subject of an adverse finding was so</p> <p>18 terrible?</p> <p>19 A. Well, I can't speak for other newspapers.</p> <p>20 LORD JUSTICE LEVESON: No, of course you can't.</p> <p>21 A. But I've never made a decision to print a story which</p> <p>22 involves that 12 weeks' scan.</p> <p>23 LORD JUSTICE LEVESON: But do you see why I ask the</p> <p>24 question?</p> <p>25 A. Mm.</p> <p style="text-align: center;">Page 48</p>

<p>1 LORD JUSTICE LEVESON: You're not speaking, obviously, for 2 the Sun, because the Sun didn't do it but you've made 3 the point somebody did, and therefore they thought it 4 was worthwhile. 5 A. I mean, I can only but speculate. I think the attempted 6 justification for that publication was that they felt 7 the news was in the public domain because it had been 8 printed on a website in Australia. But the complaint 9 was not -- was upheld. 10 LORD JUSTICE LEVESON: Yes. 11 MR JAY: I think you told us a moment ago that the 12 publication of such a story in relation to Danny Minogue 13 would increase sales. Is it the position, generally 14 speaking, that if you have a good story, an exclusive 15 story, particularly one which you're able to put on the 16 front page, that that would have a favourable impact on 17 sales? 18 A. It can do, yes. It can do. 19 Q. Well, in what circumstances wouldn't it have 20 a favourable impact on sales? 21 A. Well, I mean, I might misjudge it. I might think that 22 there's a story that might increase sales but it 23 doesn't. And it might surprise people to learn that the 24 biggest-selling story of the past, I think, 12 to 18 25 months has been not a celebrity story but stories</p> <p style="text-align: center;">Page 49</p>	<p>1 which have -- or campaigns, both, which have been 2 particularly beneficial. It's right that you should 3 tell us about that, Mr Mohan, and you've provided 4 examples in the exhibit. First of all, there's the Help 5 For Heroes charity campaign which was started in 2007. 6 That's raised an enormous sum, has it not? 7 A. Yes. I think it is important to emphasise that I do 8 believe that the Sun can be a real powerful force for 9 good, and I think these campaigns are an example of 10 that. Help For Heroes has now raised 120 million, 11 actually is the latest figure, for injured servicemen, 12 and I think it's really raised the profile of our brave, 13 injured soldiers who were, it must be said, perhaps 14 a little neglected before that campaign. 15 Out of that came the Millies awards, which took 16 place in December. We launched it in 2008. This is 17 where we honour injured service personnel and I think as 18 Mr Larcombe said, Princes William and Harry and Kate 19 Middleton attended that event. 20 Also, I really do feel the Sun has a role to help 21 its readers and help them through tough times. We do 22 that through -- I mean, obviously we have a cheap cover 23 price, we send millions of readers on holiday each year 24 for £9.50. It's one of the most successful promotions 25 in Fleet Street. Also, when the unemployment total</p> <p style="text-align: center;">Page 51</p>
<p>1 involving the killer of James Bulger. 2 Q. Yes, but presumably you're looking at circulation 3 figures from day to day to see whether any trends, 4 either up or down, can be demonstrated; is that right? 5 A. Yes, but I wouldn't let that compromise any ethical 6 decision. 7 Q. No, I'm not suggesting that it would, Mr Mohan. All I'm 8 seeking is to identify whether there is some sort of 9 correlation between an exclusive story, particularly one 10 which you can place on your front page, and an upward 11 spike in circulation. Is that correlation one which you 12 yourself feel can be demonstrated? 13 A. Yes. Yes, there'll often be stories that will -- 14 I mean, for instance, when the X Factor's on TV, a story 15 about the X Factor will usually perform quite well for 16 us, whereas if we have a front page story which is maybe 17 an all round story that's in every other newspaper, then 18 it won't do as well. 19 Q. I'm not suggesting for one moment that ethical 20 considerations are compromised, but as the editor of the 21 best-selling national newspaper, the link, if any, 22 between stories and sales is something that you are 23 particularly sensitive to; is that right? 24 A. Something I'm aware of, of course, professionally. 25 Q. Okay, paragraph 33. You give some examples of stories</p> <p style="text-align: center;">Page 50</p>	<p>1 exceeded 2.5 million, I started a section called "Sun 2 employment", which has found about 50,000 readers jobs 3 or training, and I've in fact had letters from readers 4 saying that that campaign has saved individual's lives 5 and their families because they were suicidal before 6 they got a job and didn't feel that they could get one. 7 Similarly, we had an education campaign to try and 8 make education for children more fun and entertaining 9 recently. We also launched a "Hold Ye Front Page" 10 website where -- this was based on a couple of books 11 that we produced in the past where we recreate the last 12 2,000 years of history in entertaining front pages. I'm 13 also taking this educational campaign on the road into 14 schools and classrooms, which involves Professor Brian 15 Cox, who is the Sun's Professor, who writes for us on 16 very complex issues like the Hadron collider and digests 17 them into very accessible chunks for the readers. And 18 similarly, earlier this year -- sorry, last year we 19 joined in partnership with Amy Winehouse's father, Mitch 20 Winehouse, and launched a drug awareness campaign for 21 which we received high praise, and there's some examples 22 in the bundle. 23 I've also been involved, in my career at the Sun, in 24 three number one singles which have raised millions for 25 the Dunblane atrocity, when I first joined the Sun, the</p> <p style="text-align: center;">Page 52</p>

<p>1 famine in Africa when we campaigned for the re-release 2 of "Do They Know it's Christmas?" and most recently we 3 partnered with Simon Cowell to release a song for Haiti, 4 which raised £1 million for disaster relief. I do think 5 this is what makes the Sun Britain's most popular 6 newspaper. 7 LORD JUSTICE LEVESON: I think it's extremely important to 8 emphasise the positive as well as be aware of the 9 negative, and nobody should think that because 10 inevitably this Inquiry is focusing on concerns which 11 represent the negative, it's not a very important part 12 of the job to balance that with the positives, the 13 examples of which you have just provided. 14 MR JAY: If you don't mind me passing through some 15 paragraphs of your statement, which again we can take as 16 read, to paragraph 52, Mr Mohan. You deal there with 17 some particular cases where wrongdoing has been exposed; 18 is that right? 19 A. Yes. I think the most interesting of those is perhaps 20 the conviction that we helped secure under the 21 Bribery Act. This is the first ever conviction under 22 the Bribery Act, where we exposed a court official who 23 was wiping clean driving licences for £500 cash, and the 24 individual has since been jailed for six years. 25 Q. This is paragraph 54.</p> <p style="text-align: center;">Page 53</p>	<p>1 them very quick, digestible summary of very, very 2 complex issues that is in an accessible way to most 3 people in the country. I know that perhaps the Sun 4 isn't the first newspaper that most people in this room 5 turn to on a daily basis, but I do believe that's what 6 we do best, and that's actually how millions of people 7 learn of serious issues on a daily basis. 8 LORD JUSTICE LEVESON: One has to be careful about how one 9 uses the phrase "public interest" there. Of course it's 10 in the public interest that there is an accessible 11 mechanism for explaining complex concepts, and to that 12 extent -- and indeed all that you've spoken about, 13 helping heroes, millies, the singles, all that is in the 14 public interest, but one has to be careful. One isn't 15 weighing that against potential problems. One has to 16 look and celebrate that and then do what one can to 17 avoid the circumstances arising which are the subject of 18 criticism. Would you agree with that as a proposition? 19 A. Yes, I would. I mean, obviously it has to be gathered 20 in a legal way and subject to the code. 21 LORD JUSTICE LEVESON: What you're not saying is: you have 22 to put up with some misbehaviour to get all this good 23 stuff? 24 A. No, I'm not. 25 LORD JUSTICE LEVESON: I didn't think you were, but I just</p> <p style="text-align: center;">Page 55</p>
<p>1 A. Mm. 2 Q. Indeed, the relevant page in the bundle is 10696, but we 3 needn't turn it up. 4 A. But that is an example of really balancing the public 5 interest. I felt there was a clear public interest in 6 exposing that criminality. They're not often as clear 7 cut as that, obviously, and I think we have to take each 8 story on its own merits. 9 Q. It might be said that that was, if I may say so, 10 a particularly straightforward example. There was an 11 overwhelming public interest there, Mr Mohan. 12 While we're still, though, on the emphasising the 13 good, at paragraph 57, you deal with -- I think this 14 came out in one of our seminars -- the headline on 15 27 July, "I owe Ouzo", which gave a succinct description 16 of the then state of the eurozone bailout crisis; is 17 that correct? 18 A. Yes, I think the public interest deserves to be looked 19 at in a wider context than just individual stories. 20 I think that the Sun and mass market newspapers are in 21 the public interest in themselves, because millions -- 22 the majority of working people in this country don't 23 really want to read the turgid 7,000 words on the 24 eurozone crisis. They'd rather read a really concise 25 and well-executed spread along these lines, which gives</p> <p style="text-align: center;">Page 54</p>	<p>1 wanted to clarify that. 2 MR JAY: Thank you. 3 May I deal now, Mr Mohan, with a number of issues 4 which are outside your statement? First of all, it has 5 been said that the tabloid press have been sitting on 6 stories, certainly since this Inquiry has started, if 7 not since July 2011, through fear that they will be 8 criticised if they don't. Is that statement something 9 that you would agree or disagree with in relation to the 10 Sun? 11 A. I think there has been an element of caution, but 12 I think that's got as much to do with the new Bribery 13 Act in tandem. 14 Q. How, though, has the Bribery Act, which came into force 15 I think in July of last year, impacted on stories which 16 involve balancing the public interest against the 17 private rights of individuals? 18 A. Sorry, the point I was making on the Bribery Act is 19 we've been very, very careful, obviously, not to publish 20 any stories that would be in breach of the Bribery Act, 21 and I've rejected a lot of stories as a result, stories 22 that have actually appeared in other newspapers. 23 Q. I think the point that was being made -- and to be 24 explicit, I think it was Mr Clifford who made it -- 25 I may be wrong, but I don't think I am -- is that</p> <p style="text-align: center;">Page 56</p>

<p>1 there's been a policy decision to suppress stories which 2 would otherwise have been published because of the 3 impact on this Inquiry. Is that something that you 4 would agree or disagree with? 5 A. I'm not sure that's the case. I mean, we've -- the 6 front page story that we ran today, for instance, was, 7 you know, quite controversial, about a famous TV chef 8 caught shoplifting from Tesco, and it certainly didn't 9 prevent us from publishing that. But yes, of course 10 we're cautious. 11 Q. Do you think you're being more cautious because of the 12 existence of this Inquiry? 13 A. Maybe a little, yes. 14 Q. Okay. Can I ask you an entirely different question 15 about your dealings, if any, with politicians? Do you 16 have frequent or any contact with those in high office 17 in this country? 18 A. I wouldn't say frequent, but yes, I do meet with 19 politicians on occasion, yes. 20 Q. Does that involve those in the highest office? 21 A. Yes. 22 Q. About how often does this take place? 23 A. It varies. I've seen Mr Cameron several times in the 24 past year, I'd say. He came to our -- he came to those 25 military awards. He also came to our police bravery Page 57</p>	<p>1 Q. Was it something that you discussed with 2 Mr Rupert Murdoch or not? 3 A. Yes. I would discuss the mood of the country and who 4 I felt might be the best choice for our readership. 5 Q. Did he support the change in allegiance or not? 6 A. I believe he did, yes. 7 Q. A final question on that theme: was the idea his idea or 8 your idea? 9 A. I think it was a -- it was a mixture. I mean, it was 10 a group decision. Mine and my fellow executives felt 11 that this was the right way to go, and we made our 12 feelings known to Mr Murdoch. 13 Q. I said I would come back to paragraph 8 of your witness 14 statement. 15 A. Mm. 16 Q. We think that this is a reference -- this is the one 17 complaint which was partially upheld. This is 18 a reference to two pieces which were in the Sun on the 19 18th and 19 September 2009. Are we correct about that? 20 A. I don't have it in front of me but if it's that one you 21 have, then yes. 22 Q. Yes, I'll hand a copy to ... You have to see it. 23 There's a nice colour version thanks to Mr Davis' 24 clients. (Handed) There are rather less wonderful 25 copies. Page 59</p>
<p>1 awards, and I did have a one-on-one session with him at 2 one point as well. 3 Q. In your own words, what's the purpose, if any, of any of 4 those encounters? 5 A. Just really a catch-up on various issues of the day, 6 concerns that we might have. 7 Q. Not, more explicitly, to ensure that the Sun continues 8 to support one political party? 9 A. You'll have to ask Mr Cameron that. 10 Q. Okay. Did you have any involvement in the decision to 11 support Mr Cameron and the Conservative party 12 in September, October 2009, the switch of -- 13 A. Of course I did, yes. I'm the editor. 14 Q. Why did that happen? 15 A. I think for some time we felt that perhaps the 16 country -- it was time for a change. We certainly 17 sensed that amongst our readership and I think we 18 reflected those concerns. 19 Q. Was it simply you being a mirror to your perception of 20 the views of your readership, or was it a case of 21 pressure being exerted from someone else? 22 A. I think the Sun's always been pretty good as capturing 23 the sort of zeitgeist of the nation, and I think we 24 certainly felt that the country was with us on that and 25 we were kind of borne out by the election result. Page 58</p>	<p>1 A. Thank you. 2 Q. To cut a long story short, Mr Mohan, this was about the 3 sex change of a child; is that right? 4 A. Yes. 5 Q. What happened was that first story, which was front 6 page and on page 5, was on Friday, 18 September 2009. 7 There was another story the following day, again on 8 page 1 and page 5. 9 A. Mm. 10 Q. There was then a complaint to the PCC by the parents 11 of -- I think there was more than one child involved but 12 it doesn't really matter. 13 A. I think the day two is a different case. 14 Q. That's right, but one of the parents complained, and 15 the -- to be fair, we don't know how long it took for 16 the PCC to adjudicate on the complaint. But the Sun 17 then published the ruling on 2 April 2010; is that 18 correct? That's the last page in the little bundle we 19 provided. 20 A. Yes, that's correct. 21 Q. And the complaint was partially upheld, not fully 22 upheld, I think it's right to say. 23 A. I think there were seven parts to the complaint and two 24 were upheld. 25 Q. It wouldn't be right for me to ask you questions in Page 60</p>

<p>1 relation to the delay between 19 September 2009 and 2 2 April 2010, since we do not know, nor do you know, in 3 the absence of you being given proper notice of this, 4 when the PCC promulgated their ruling. It might have 5 been 1 April 2010, for all we know. But why was the 6 ruling published on page 6?</p> <p>7 A. I can't remember the intricacies of the case but that 8 would have been negotiated with the PCC, the prominence 9 of the apology.</p> <p>10 Q. You say "would have been". Is it something you're sure 11 about or is it something --</p> <p>12 A. In normal cases, it would be, but I can't be sure for 13 this one.</p> <p>14 Q. It just seems a little bit odd that if you're according 15 front-page prominence to exclusive stories and then the 16 full story is page 5 in each case, that we see the PCC 17 ruling -- I'm not saying "hidden", because it's not 18 hidden, but it's on the right-hand side of page 6 and 19 it's really the smallest article on the page in terms of 20 its print size.</p> <p>21 A. It's a very long complaint, that, though, a very long 22 ruling. It's one of the longest I think we've ever 23 published.</p> <p>24 Q. Okay. But you think that was as a result of the 25 negotiation with the PCC? Is that your evidence,</p> <p style="text-align: center;">Page 61</p>	<p>1 Q. Okay. Can I ask you about something completely 2 different, and the issue of phone hacking. There was an 3 award ceremony, I think, in 2002, which were called the 4 Princess Margaret awards, otherwise known as Shaftas; is 5 that correct?</p> <p>6 A. That's correct.</p> <p>7 Q. Do you speak at that ceremony?</p> <p>8 A. Very briefly, I believe.</p> <p>9 Q. You're recorded as having said words to this effect: 10 that you thanked Vodafone's lack of security for the 11 Mirror's showbusiness exclusives. First of all, did you 12 thank Vodafone in that context in relation to the 13 Mirror?</p> <p>14 A. I can't remember my exact words, but I believe I said 15 something along those lines, yes.</p> <p>16 Q. The obvious question is: well, what did you mean by 17 that?</p> <p>18 A. It was said purely as a joke. It was a cheap shot at 19 the Mirror. It was deliberately attempting to undermine 20 the quality of their journalism because they'd had 21 a particularly good year.</p> <p>22 Q. Yes, but Vodafone's lack of security was surely 23 a reference to the fact that you could hack into 24 Vodafone's mobile phones because their PIN number system 25 was so easily penetrable, particularly if you didn't</p> <p style="text-align: center;">Page 63</p>
<p>1 Mr Mohan?</p> <p>2 A. Yes. But I can check that and provide it to the Inquiry 3 if you'd like me to.</p> <p>4 Q. You've only been informed about this, I think, this 5 morning at the earliest, so you haven't had time to 6 research it, have you, Mr Mohan?</p> <p>7 A. No.</p> <p>8 Q. It's one of the core participants who is asking me to 9 put these questions to you.</p> <p>10 LORD JUSTICE LEVESON: Well, you'll find the answer and let 11 us know. Just write a letter.</p> <p>12 A. Okay.</p> <p>13 MR JAY: I'm also asked to put to you that in 2010, just 14 taking one year, there were 38 complaints which were 15 resolved, really, on the basis of the Sun admitting 16 a breach of the code, and which therefore didn't go on 17 to adjudication. Does that accord with your 18 recollection?</p> <p>19 A. I'd have to check the figure.</p> <p>20 Q. Because of course only a small proportion of complaints 21 actually go to adjudication, don't they?</p> <p>22 A. I mean, we endeavour to clear up complaints as swiftly 23 and efficiently as possible, so I think you could argue 24 it's not a bad thing that 38 were cleared up before 25 going to adjudication.</p> <p style="text-align: center;">Page 62</p>	<p>1 change the default setting. That's what you were 2 referring to, wasn't it?</p> <p>3 A. Yes, it was.</p> <p>4 Q. So you knew, therefore, that it was possible to hack 5 into voicemails readily or fairly readily, didn't you?</p> <p>6 A. Yes. I think it was well known. There had been several 7 articles printed about this issue, not least in the 8 Daily Mirror itself, which exposed in 1998 the lax 9 security around the Irish cabinet's mobile telephones. 10 They actually, as part of an investigation, hacked into 11 the Irish cabinet and premier's phones, from my 12 recollection. There had also been another article in 13 the Independent on Sunday, I believe.</p> <p>14 Q. Wasn't the true position something along these lines: 15 that there were rumours going around in the press, which 16 you well knew about, which were suggesting that phone 17 hacking was occurring on a fairly systematic basis in 18 the Mirror's titles? Is that right or not?</p> <p>19 A. There were rumours in the industry. There's always 20 rumours in the industry about various methods, but this 21 wasn't based upon any evidence at all. It was just the 22 Fleet Street rumour mill.</p> <p>23 Q. You weren't concerned about the law of defamation, were 24 you, when you made this statement?</p> <p>25 A. I don't remember that I was, no.</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 Q. Okay. Did those rumours encompass the Sun, for whom of 2 course you were working in 2002? 3 A. I can't remember. It was a very long time ago, clearly. 4 I can't remember the specifics of the rumours. 5 Q. You're not trying to distance yourself now, are you, 6 Mr Mohan, from what you said in 2002? 7 A. I think I've been frank in my explanation. It was said 8 as a joke to undermine the Mirror's journalism. 9 Q. Mr Morgan, I think, was the editor of the Mirror then, 10 wasn't he? 11 A. I believe he was, yeah. 12 Q. What was the nature of your relationship with him? Was 13 it good, bad or indifferent? 14 A. Fairly indifferent, I'd say. 15 Q. Okay. Let me ask you about something else. The 16 particular piece, if I can find it, which was published 17 in the Sun, I think in November of last year, involving 18 rumours about the Duchess of Cambridge being pregnant. 19 Just bear with me. Yes, it was Mr Larcombe who wrote 20 it, published 4 November 2011. Do you know about this 21 piece? There was concern, I think, about the Duchess of 22 Cambridge refusing to eat peanut paste during a royal 23 engagement because she might be pregnant? 24 A. I do remember that story, yes, I think. I don't believe 25 it was exclusive to us. I think there was a lot of</p> <p style="text-align: center;">Page 65</p>	<p>1 also the culture of the newspaper? 2 A. I think to describe the paper as being quite -- as 3 celebrating modern life and that it's 2011, or 2012 4 even, rather than pining for the fact that we wish it 5 was like 1955 again, which I think a number of other 6 newspapers do. I think that I've made the paper more 7 modern. It's vibrant, it's humorous, and actually, what 8 I was talking about earlier regarding a sort of service 9 to the readers, to really cheer them up through very, 10 very hard times. A lot of our readers are going through 11 very hard times, so I think the Sun's unique mix of 12 humour and informative articles is very important. 13 Also, I think that -- I think some newspapers are 14 quite blinkered in their attitudes in terms of -- 15 I think with the advances of the Internet, the British 16 people's interests are so wide now and they can be 17 interested in kit shortages in Afghanistan, who is going 18 to win the X Factor, whether Wayne Rooney's going to 19 play for England and whether the welfare culture in this 20 country is out of control. These things aren't mutually 21 exclusive, and I think that the Sun reflects my 22 personality in that way, because I'm very interested in 23 all those issues, and if I am, I think there's probably 24 quite a few million people out there who are too. 25 Q. What would you say is your biggest priority, going</p> <p style="text-align: center;">Page 67</p>
<p>1 speculation at the time. 2 Q. Why did you publish it? 3 A. I don't think -- 4 Q. Do you want to have a look at it? 5 A. Yeah, sorry, you'll have to refresh -- can I see it? 6 Q. Yes, of course. I hope it's not going to go to sleep on 7 me, as it has done in the past. It only has a two 8 minute -- I think, scroll down the Ipad. It's not my 9 machine, so I'm not responsible for it. 10 A. I mean, it is what it is. It looks like a piece of 11 speculation about the Duchess of Cambridge's dietary 12 requirements. 13 Q. In the context of whether or not she was pregnant; is 14 that right? 15 A. Yes. 16 Q. Was there any public interest in that story? 17 A. I mean, I think there is obviously public interest in 18 whether the Duchess of Cambridge would be pregnant and 19 would be providing a potential heir to the throne. 20 Q. In that sense, obviously, but if she were pregnant, you 21 would normally wait the 12 weeks, wouldn't you? 22 A. Yes. 23 Q. May I ask you, finally, some general questions. In 24 terms of your leadership, as editor, what is your 25 vision, both in terms of the content of the paper and</p> <p style="text-align: center;">Page 66</p>	<p>1 forward? 2 A. I think really my biggest challenge is probably in the 3 digital area, because I think over the past 12 months 4 we've noticed a massive increase in handheld devices, 5 tablets, and I think all newspapers are suffering 6 circulation losses as a result, and clearly the 7 challenges that we face from the Internet and from 8 Twitter, from Facebook. We need to make ourselves as 9 relevant as we can, obviously. 10 And I think that one thing struck me was when the 11 furore was ongoing about the Ryan Giggs injunction. 12 I remember when we were in the position to print the 13 name of the footballer -- and obviously there had been 14 huge speculation on social media about his identity and 15 I sat and I wrote the front page, and the headline was: 16 "It's Ryan Giggs", and as I wrote it, my heart sank 17 because I realised there were probably several million 18 people out there who already knew that because they 19 weren't subject to the same restrictions that we'd been 20 under. 21 I think one thing I would ask out of this Inquiry is 22 that the Internet and the press -- that there's a level 23 playing field in terms of the way they're dealt with, 24 because I do think it could be a potentially mortal blow 25 to the newspaper industry that's already wounded.</p> <p style="text-align: center;">Page 68</p>

<p>1 I think the combination of an overregulated press with 2 an unregulated Internet is a very, very worrying thought 3 for an industry that employs many thousands of people. 4 LORD JUSTICE LEVESON: How would you do that? 5 A. I don't know. All I would say is that there should be 6 a level playing field. 7 LORD JUSTICE LEVESON: That's kind. 8 A. Sorry. 9 MR JAY: In terms of your ideas for future regulation of the 10 press, which you must have thought about -- I'm sure you 11 have -- in the context of this Inquiry, a future role 12 for the PCC in whatever manifestation and more 13 generally, can you share your current thinking, please, 14 in relation to that with us? 15 A. I think my thinking is still evolving on that, as 16 I think most people's in the industry is, but I do think 17 the PCC has been effective as a mediator. I think that 18 when they issue desist notices about potential 19 harassment, we take those very, very seriously and act 20 on them immediately, and an adjudication upheld is met 21 with great shame by certainly me and I'm sure by other 22 editors. 23 However, obviously I do understand that it needs to 24 be toughened up. I do think that mediation is a big 25 area where -- we've been quite successful, actually,</p> <p style="text-align: center;">Page 69</p>	<p>1 defence. 2 I'd be interested in your view about that concern, 3 and what steps you think I can properly take to ensure, 4 as best I can, that nobody is the subject of adverse 5 press attention simply because they've participated in 6 this Inquiry or taken a particular line. 7 I'm not specifically talking about the Sun but I'm 8 not excluding the Sun, but it is something which does 9 concern me, and as an editor of a newspaper which has 10 the readership that you've described, that has the 11 really beneficial aspects which you've spoken about, I'd 12 be interested in whether you think first of all that 13 such a line is understandable, whether it's justifiable 14 and how it can be prevented. 15 A. I mean, the Sun has 8 million readers a day and they're 16 not stupid. I think it would be fairly transparent if 17 we started launching attacks on the individuals involved 18 in this Inquiry. I think that if you look at, for 19 instance, Charlotte Church, Charlotte Church has been 20 dealing with the tabloids for many years and she 21 obviously complained about the story regarding her 22 pregnancy, which was upheld, yet we didn't hold it 23 against her. Gordon Smart, the showbusiness editor, 24 interviewed her only last year, I believe, and she was 25 very open about a lot of personal matters. So I think</p> <p style="text-align: center;">Page 71</p>
<p>1 resolving a number of legal complaints through 2 mediation, and I think that a firm mediation arm 3 associated with the PCC would be a sensible way forward. 4 In terms of statutory regulation, that's obviously 5 something that I would be quite fearful of and it could 6 be open to abuse. I feel it could be the thin end of 7 the wedge, but if a statutory element was introduced, 8 I would just ask that there would be a level playing 9 field with the press and the Internet. 10 LORD JUSTICE LEVESON: But it can have a backstop without 11 being statutory regulation, because it could be 12 regulation by those that are involved in the business. 13 A. (Nods head) Yes. 14 MR JAY: Those are all the questions I had for Mr Mohan. 15 LORD JUSTICE LEVESON: There's one area that I want to 16 cover. 17 I'm sure you've heard some of the witnesses who 18 complain about their treatment at the hands of the 19 press, expressing great concern that they will be 20 targeted for having made a fuss, and that as a result, 21 when all this is over and all this has died down, they 22 will face the wrath of the press in a way that nobody 23 would be there to protect them, and there has been some 24 material from which it might be possible to infer that 25 the view has been taken that attack is the best form of</p> <p style="text-align: center;">Page 70</p>	<p>1 that it would be pretty transparent to the readers if we 2 suddenly launched many negative stories against the 3 individuals concerned. 4 LORD JUSTICE LEVESON: It's no part of your thinking of the 5 ethos looking forward for the Sun? 6 A. No. I can't speak for others, obviously. 7 LORD JUSTICE LEVESON: No, I can only ask you about the Sun 8 But I might ask everybody, one by one. 9 A. (Nods head) 10 LORD JUSTICE LEVESON: How best do you think it's 11 appropriate to protect the interests of smaller people, 12 whether it be those caught up in disasters like 13 Christopher Jefferies or the McCanns, or those involved 14 in disasters? And there have been other examples that 15 the Inquiry has heard. 16 A. Well, I think swifter access to justice is obviously an 17 interesting point, and I think that maybe a mediation 18 arm of the PCC could aid that. 19 LORD JUSTICE LEVESON: Yes. I've spoken about that, as 20 I think you probably know. But if one were to do 21 that -- and I am attracted to the idea of having some 22 mechanism for speedy and comparatively cheap resolution 23 of disputes, not that I'm trying to do so many of the 24 distinguished Queen's Counsel in this room out of 25 business, but to try and resolve these issues more</p> <p style="text-align: center;">Page 72</p>

<p>1 quickly, then there would have to be, wouldn't there, 2 some requirement that people get involved in it? 3 A. Yes, and I do think there could be encouragements 4 offered. For instance, I'm quite in favourite of a kite 5 marking system, where newspapers that are signed up with 6 whatever the body's called would carry kite marks, and 7 there could be knock-on effects for advertising rates, 8 et cetera, for publications that perhaps don't carry 9 that kite mark. 10 LORD JUSTICE LEVESON: Yes. It's quite difficult to do 11 taxwise, because I think you'd run into tax 12 implications. The problem about kite marks is that you 13 might then get some of your Internet sites positively 14 boasting that they're not interested in kite marks and 15 that they relish the idea of putting stuff out that 16 doesn't, unless one can require them to participate. 17 Once you use the word "require", I'm concerned that you 18 have to have, somewhere in the background, some way of 19 saying, "This has got to happen." 20 A. Mm. 21 LORD JUSTICE LEVESON: Whoever judges it, whether they're 22 editors, ex-editors, members of the public, however you 23 judge it, there has to be some way of saying that 24 getting involved in this mechanism for the resolution of 25 disputes is not optional.</p> <p style="text-align: center;">Page 73</p>	<p>1 public domain? 2 MR JAY: Yes, please. 3 LORD JUSTICE LEVESON: Mr Rhodri Davies, I think they're all 4 witnesses that you're concerned with? 5 MR DAVIES: Yes. That's absolutely fine from our point of 6 view. 7 LORD JUSTICE LEVESON: And there's been no objection to that 8 course? 9 MR DAVIES: No. 10 LORD JUSTICE LEVESON: Right, thank you very much. 11 Mr Mohan, thank you very much. We'll resume again at 12 10 o'clock tomorrow. 13 (4.20 pm) 14 (The hearing adjourned until 10 o'clock the following day) 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 75</p>
<p>1 A. I understand your dilemma, but I would -- statutory 2 regulation or even a backstop does fill me with fear, 3 because I believe it could be open to abuse. 4 LORD JUSTICE LEVESON: That depends how you do it, doesn't 5 it? Or maybe you don't think it does? Mm. All right, 6 well, thank you very much indeed, Mr Mohan. Thank you 7 very much indeed. 8 A. Thank you. 9 MR JAY: Well, that's it for today. 10 LORD JUSTICE LEVESON: Not bad timing, Mr Jay. 11 MR JAY: I'm not going to summarise, if you forgive me, the 12 evidence of Mr Higgins, Mr Yelland and Mr Hamilton. 13 LORD JUSTICE LEVESON: We do have that additional evidence. 14 Let's just identify who they are. 15 MR JAY: Mr Higgins was editor 1994 to 1998. Mr Yelland, 16 I think, 1998 to 2002. Mr Hamilton is the current 17 features editor of the Sun. 18 LORD JUSTICE LEVESON: Right. They've all made statements 19 dealing with questions that I asked them to deal with. 20 MR JAY: Yes. 21 LORD JUSTICE LEVESON: And those statements are all 22 available, some of them in substantial length. Do 23 I understand from what you're saying that these 24 statements should now be considered as part of the 25 Inquiry to be published on the website and put into the</p> <p style="text-align: center;">Page 74</p>	

<p>A</p> <p>able 17:25 20:9 36:10 49:15</p> <p>absence 61:3</p> <p>absolutely 9:23 15:2 21:22 24:23,23 75:5</p> <p>abuse 70:6 74:3</p> <p>academic 12:4 13:2</p> <p>accept 10:15,16</p> <p>accepted 4:19 11:5,7,11</p> <p>access 72:16</p> <p>accessible 52:17 55:2,10</p> <p>accord 62:17</p> <p>accuracy 33:3</p> <p>achieve 28:7</p> <p>act 7:15 32:19 39:7 46:8 47:15 53:21,22 56:13,14,18,20 69:19</p> <p>acting 20:10 38:18</p> <p>activity 38:15</p> <p>add 25:23</p> <p>added 5:10</p> <p>additional 74:13</p> <p>address 8:9</p> <p>addressed 3:18</p> <p>adherence 31:14</p> <p>adjourned 75:14</p> <p>adjudicate 60:16</p> <p>adjudication 47:22,23 62:17 62:21,25 69:20</p> <p>admitting 62:15</p> <p>advances 67:15</p> <p>adverse 48:17 71:4</p> <p>advertising 73:7</p> <p>advise 8:10,14 10:13,15,15,16 10:18,23 11:5 11:7,10,11 16:7 19:2 25:11</p> <p>advise 15:9 18:25 21:10</p> <p>adviser 13:25</p> <p>Afghanistan 67:17</p> <p>afraid 5:14 29:10 35:4 38:6</p> <p>Africa 53:1</p> <p>afternoon 1:3 9:10</p> <p>agencies 44:3</p> <p>agent 18:14 44:14</p> <p>agents 18:11 43:11,14,17</p> <p>ago 3:23 27:6 49:11 65:3</p> <p>agree 55:18 56:9</p>	<p>57:4</p> <p>agreed 41:24</p> <p>ahead 11:16 15:12,18</p> <p>aid 72:18</p> <p>Aids 32:22</p> <p>allegation 41:19</p> <p>alleged 13:14</p> <p>allegiance 59:5</p> <p>allowed 30:13</p> <p>Amanda 34:8</p> <p>amended 9:1</p> <p>amidst 38:19</p> <p>amount 7:22 10:3 16:4 18:19 45:25</p> <p>amounts 18:17 18:17</p> <p>Amy 52:19</p> <p>analogy 3:4</p> <p>analysing 5:9</p> <p>annoyed 40:20</p> <p>answer 26:11 32:25 62:10</p> <p>anyway 12:22 15:23</p> <p>apologise 14:3</p> <p>apology 61:9</p> <p>apparently 43:20</p> <p>appeal 8:1 34:8 48:5</p> <p>appear 13:16</p> <p>appeared 56:22</p> <p>appears 8:14 13:16 26:5</p> <p>application 40:19</p> <p>applies 33:9</p> <p>appointing 37:25</p> <p>appreciate 28:24</p> <p>approach 3:21 6:12 10:11</p> <p>appropriate 37:13 72:11</p> <p>appropriately 30:17</p> <p>April 60:17 61:2 61:5</p> <p>area 44:19 68:3 69:25 70:15</p> <p>argue 62:23</p> <p>arguments 1:6</p> <p>arising 45:6 55:17</p> <p>arm 39:11 70:2 72:18</p> <p>arose 26:25</p> <p>arranged 22:13</p> <p>arrested 22:2 35:24</p> <p>article 7:14 11:25 12:1,5 41:7,12 61:19 64:12</p> <p>articles 27:15 64:7 67:12</p>	<p>asked 10:12 14:1 18:25 19:2 42:16 62:13 74:19</p> <p>asking 62:8</p> <p>aspects 71:11</p> <p>assessed 26:17</p> <p>assessment 9:21 25:1,8 26:11</p> <p>assist 10:20 18:1</p> <p>assistance 22:23</p> <p>assistant 36:2,5</p> <p>assisting 28:8,8</p> <p>associated 70:3</p> <p>assurances 24:1</p> <p>assured 23:18</p> <p>atrocious 52:25</p> <p>attack 70:25</p> <p>attacks 71:17</p> <p>attempted 49:5</p> <p>attempting 63:19</p> <p>attended 51:19</p> <p>attention 35:11 71:5</p> <p>attitudes 67:14</p> <p>attracted 36:18 72:21</p> <p>audit 26:15 45:22</p> <p>August 30:25</p> <p>Australia 49:8</p> <p>available 74:22</p> <p>avoid 19:23 55:17</p> <p>avoided 15:3</p> <p>award 63:3</p> <p>awards 51:15 57:25 58:1 63:4</p> <p>aware 13:20 27:14 41:22 50:24 53:8</p> <p>awareness 52:20</p>	<p>B</p> <p>b 25:8</p> <p>back 6:4 9:1,5 15:5 17:13 22:25 23:8 26:21 36:21 39:10,10 41:6 45:9,18 46:22 59:13</p> <p>background 73:18</p> <p>backstop 70:10 74:2</p> <p>bad 62:24 65:13 74:10</p> <p>bailout 54:16</p> <p>balance 26:3,18 36:9 53:12</p> <p>balanced 13:13 48:12</p> <p>balancing 20:20 54:4 56:16</p>	<p>banner 13:17</p> <p>bar 2:14 4:11</p> <p>barometer 35:10</p> <p>barrister 2:13</p> <p>based 52:10 64:21</p> <p>basically 8:22</p> <p>basis 32:7 40:1 46:19,23 55:5 55:7 62:15 64:17</p> <p>basket 25:15 28:14</p> <p>baton 8:4</p> <p>Beabey 2:11</p> <p>bear 65:19</p> <p>bed 10:3</p> <p>beginning 8:6</p> <p>behalf 19:17</p> <p>believe 10:11 11:8 23:23 32:24 34:19 35:5 51:8 55:5 59:6 63:8,14 64:13 65:11,24 71:24 74:3</p> <p>Ben 2:10</p> <p>bench 9:5 26:21 46:22</p> <p>beneficial 51:2 71:11</p> <p>best 2:25 55:6 59:4 70:25 71:4 72:10</p> <p>best-selling 50:21</p> <p>better 23:9</p> <p>big 13:17,17 40:16 69:24</p> <p>biggest 27:2 67:25 68:2</p> <p>biggest-selling 49:24</p> <p>birth 44:4</p> <p>bit 5:15,16,17,17 5:19 14:1 32:15 40:5 43:18 61:14</p> <p>Bizarre 31:7</p> <p>blame 6:2</p> <p>blinker 67:14</p> <p>blow 68:24</p> <p>bluntly 11:18</p> <p>blurb 42:14</p> <p>board 5:5 27:11</p> <p>boasting 73:14</p> <p>body's 73:6</p> <p>bold 13:17</p> <p>books 52:10</p> <p>booze 42:11</p> <p>borne 58:25</p> <p>bottom 26:6</p> <p>brave 51:12</p> <p>bravery 57:25</p> <p>breach 13:3 21:8 48:16 56:20 62:16</p>	<p>breaching 11:19</p> <p>break 29:21 30:2</p> <p>breaking 35:6</p> <p>breathing 47:16</p> <p>Brian 52:14</p> <p>Bribery 32:19 39:7 46:8 47:15 53:21,22 56:12,14,18,20</p> <p>briefly 63:8</p> <p>brilliantly 13:6,7</p> <p>bring 33:21</p> <p>Britain's 53:5</p> <p>British 67:15</p> <p>Broadmoor 33:4</p> <p>brutal 10:16</p> <p>budget 39:9</p> <p>budgets 39:9</p> <p>built 7:12</p> <p>Bulger 50:1</p> <p>bundle 1:15 42:6 32:24 52:22 54:2 60:18</p> <p>business 70:12 72:25</p> <p>busy 28:6 29:1</p> <p>button 34:18</p>	<p>17:19 22:12 23:11 25:6,8 25:20 34:5 41:10,25 44:18 57:5 58:20 60:13 61:7,16</p> <p>Caseby 32:5</p> <p>cases 7:12 15:7 15:22 26:12 31:22 53:17 61:12</p> <p>cash 33:18 53:23</p> <p>catch-up 58:5</p> <p>categories 14:11</p> <p>category 44:16</p> <p>caught 57:8 72:12</p> <p>caused 6:7</p> <p>causes 5:14,22</p> <p>caution 56:11</p> <p>cautious 57:10 57:11</p> <p>celebrate 55:16</p> <p>celebrating 67:3</p> <p>celebrities 18:9</p> <p>celebrity 6:18,21 6:24 7:4,7 18:14 44:12,13 44:14 49:25</p> <p>ceremony 63:3,7</p> <p>certain 10:23 19:17 26:1,24</p> <p>certainly 6:24 7:7 8:4 18:16 29:10,24 32:18 56:6 57:8 58:16,24 69:21</p> <p>certificates 44:5</p> <p>cetera 39:10 40:14,23 73:8</p> <p>challenge 27:10 68:2</p> <p>challenges 68:7</p> <p>challenging 10:5</p> <p>chambers 2:15</p> <p>chance 15:4</p> <p>change 3:17,25 4:25 6:8 58:16 59:5 60:3 64:1</p> <p>changed 4:13 27:12 47:9</p> <p>changes 4:22,23 5:6</p> <p>charity 51:5</p> <p>Charlotte 47:21 71:19,19</p> <p>cheap 51:22 63:18 72:22</p> <p>check 16:6 45:10 62:2,19</p> <p>checked 4:4 24:11</p> <p>checking 44:8</p> <p>checks 44:5</p> <p>cheer 67:9</p> <p>chef 57:7</p> <p>chief 39:23 43:1</p>	<p>43:5,16</p> <p>child 60:3,11</p> <p>children 52:8</p> <p>choice 59:4</p> <p>chose 41:23 44:13</p> <p>Christmas 53:2</p> <p>Christopher 72:13</p> <p>chunks 52:17</p> <p>Church 71:19,19</p> <p>Church's 47:21</p> <p>circulation 50:2 50:11 68:6</p> <p>circumstances 19:24 49:19 55:17</p> <p>civil 21:7</p> <p>claimant's 8:4</p> <p>claimed 41:20</p> <p>clarify 56:1</p> <p>clarifying 42:3,5</p> <p>classic 12:16</p> <p>classrooms 52:14</p> <p>clean 53:23</p> <p>clear 20:8 21:13 21:20 31:12 42:11 48:10 54:5,6 62:22</p> <p>cleared 42:1,15 42:18 62:24</p> <p>clearly 10:18 65:3 68:6</p> <p>clients 59:24</p> <p>Clifford 56:24</p> <p>close 32:13 35:11</p> <p>closely 38:23 39:11</p> <p>coalface 8:18 13:1,20 24:17</p> <p>code 21:1 22:23 23:3 27:12 31:14,14 48:17 55:20 62:16</p> <p>coin 17:23</p> <p>colleagues 9:24</p> <p>collider 52:16</p> <p>colour 59:23</p> <p>column 31:7 39:15</p> <p>combination 69:1</p> <p>come 8:20 9:4,8 13:15 15:5 20:8 21:25 40:13 44:19 45:9 59:13</p> <p>comes 10:25 24:15 25:13 26:11 47:1,4,7</p> <p>comfortable 1:18 30:9</p> <p>coming 45:18</p> <p>comment 5:24 5:25 28:3 36:9 36:10 41:14</p>
<p>C</p> <p>cabinet 64:11</p> <p>cabinet's 64:9</p> <p>call 1:14</p> <p>called 2:10,14 28:2 52:1 63:3 73:6</p> <p>calls 35:11,17,19</p> <p>Cambridge 65:18,22 66:18</p> <p>Cambridge's 66:11</p> <p>Cameron 57:23 58:9,11</p> <p>campaign 51:5 51:14 52:4,7 52:13,20</p> <p>campaigned 53:1</p> <p>campaigns 51:1 51:9</p> <p>Campbell 6:7 7:11,18 12:3</p> <p>capturing 58:22</p> <p>career 11:15 25:10 36:19,20 43:7 52:23</p> <p>careful 19:6 43:18 55:8,14 56:19</p> <p>carefully 15:5 18:23</p> <p>carried 14:10</p> <p>carry 16:13 21:23 46:4 73:6,8</p> <p>case 6:7,15 7:11 12:3,15 14:18 15:14 17:18,19</p>							

commercial 48:5	45:1,3	15:17 53:22	43:21 45:13	deserves 54:18	distance 65:5	editorial 2:4 9:25
commercially 38:3	Consulting 45:2	courtesy 30:15	53:16 54:13	desire 3:2	distinction 21:11	13:25 21:19
company 22:10	contact 9:9 46:18	courts 12:18	56:3 74:19	desist 69:18	43:11,17	24:9 26:11
comparatively 48:13 72:22	57:16	17:16	dealing 9:14,15	desk 44:25	distinguished 72:24	37:23 40:24
complain 70:18	contemporane... 28:10	cover 8:10 18:20	14:12 38:10,10	despite 48:5	divide 3:10	editorially 17:6
complained 60:14 71:21	content 40:25	covered 22:15	39:16 44:12	destroyed 20:5	document 26:15	editors 22:11
complaint 17:3	66:25	33:15	71:20 74:19	detail 14:17 27:7	documents 33:16	28:24 30:12
17:21 27:22,23	context 54:19	covers 3:12,15	dealings 39:22	details 35:4	doing 9:20,20	69:22 73:22
32:16 41:18	63:12 66:13	Cowell 53:3	39:22 40:3	detective 43:20	domain 49:7	editorship 4:17
48:8 49:8	69:11	Cox 52:15	57:15	detectives 43:13	75:1	47:21
59:17 60:10,16	continues 58:7	co-operate 20:9	deals 39:14	determined 46:14	domestic 7:14	editor's 10:21
60:21,23 61:21	contracts 31:15	creating 35:19	45:23	develop 29:4	Dominic 30:5,7	12:9,12 21:14
complaints 7:22	31:16	creative 10:2,6	dealt 42:16 68:23	developing 4:20	30:11	22:22 37:12
7:24 27:16	contrary 21:5,7	criminal 21:5,24	death 3:15 38:17	4:25	Donlan 38:15	39:4
31:21 36:4	control 35:21	criminality 54:6	44:4	development 5:8	door 12:20	education 52:7,8
38:10,12 39:16	39:8 67:20	crisis 54:16,24	debates 26:20	devices 68:4	doubt 32:25	educational 52:13
41:5,20 62:14	controls 43:6	critical 29:6	December 51:16	died 36:24 37:6	download 40:21	effect 24:1 63:9
62:20,22 70:1	controversial 57:7	criticised 56:8	decide 27:23	70:21	drinking 41:21	effective 69:17
completely 63:1	Convention 26:13	criticism 35:20	decided 48:4	dietary 66:11	driving 53:23	effectively 2:6
complex 52:16	conviction 53:20	criticism/unfa... 36:18 37:1	decides 11:14	difference 2:18	drug 52:20	effects 73:7
55:2,11	53:21	55:18	15:12	2:21 3:9 6:11	drugs 19:7,8,11	efficiently 62:23
compromise 50:5	conversation 27:7	criticism/unfa... 36:10	10:10,20,21	6:13 15:6	19:15,16,20	eight 7:2
compromised 50:20	conviction 53:20	Crone 2:9	12:10,12,16,23	different 4:16,18	20:1,2,4,5	either 26:12
concentration 24:14,24	53:21	culture 2:18,25	21:2,13,16,17	12:22,23 17:19	dry 12:4	34:13 50:4
concepts 55:11	convictions 34:9	46:15,25 47:4	21:21 48:21	34:16 43:25	dual 39:16	elaborated 13:22
concern 5:22	copies 59:25	47:9 67:1,19	50:6 57:1	57:14 60:13	Duchess 65:18	election 58:25
24:17 65:21	copy 1:22 10:24	curious 40:12	58:10 59:10	63:2	65:21 66:11,18	electoral 44:5
70:19 71:2,9	25:21 26:3,4	current 2:3	decisions 5:9	difficult 27:3	Dunblane 52:25	electronic 15:19
concerned 23:16	26:22 59:22	69:13 74:16	26:19 28:9,21	28:6 36:8	duties 32:10	element 21:3
34:20 64:23	core 1:5 62:8	currently 2:3	deep 5:4	45:24 48:12	37:11,14	56:11 70:7
72:3 73:17	corporate 39:21	cut 26:7 39:10,10	deeply 5:9	73:10	duty 15:13 16:11	emails 35:12
75:4	correct 1:23 2:7	54:7 60:2	defamation 64:23	difficulty 43:21	16:23 17:7,21	email-wise 35:16
concerns 53:10	2:8 8:15,21		64:23	digestible 55:1		emphasis 5:11
58:6,18	15:2 31:2,4,10	D	default 64:1	digests 52:16	E	23:3,4
concise 54:24	31:11 34:1	daily 34:10 46:22	defence 71:1	digital 40:19	earlier 52:18	emphaise 51:7
conclusion 13:15	35:21 54:17	55:5,7 64:8	defensive 17:10	68:3	67:8	53:8
conclusions 27:25	59:19 60:18,20	Danny 48:1,6	definitely 2:25	dilemma 74:1	earliest 16:17	emphasising 54:12
concrete 18:1	63:5,6	49:12	8:5	direct 10:13	62:5	54:12
19:3	corrected 23:7	databases 44:4	definition 19:21	14:21	early 18:14	employ 43:22,23
conduct 19:1	correction 41:8	date 2:1 16:15	degree 26:24	directly 8:14	easily 13:14	employment 31:15 52:2
31:12	41:13	dated 1:22 30:18	delay 61:1	22:3	63:25	employs 69:3
conducted 20:21	corrections 41:3	30:21	delays 16:14	director 2:9	easy 16:13	encompass 65:1
conference 45:9	41:6	Davies 1:10 75:3	delegate 32:10	disagree 56:9	eat 65:22	encompassed 23:12
46:20	correlation 50:9	75:5,9	delete 25:22	57:4	edicts 39:10	encounter 20:16
conferences 46:21	50:11	Davis 59:23	deliberate 26:7	disaster 53:4	editing 10:8	encounters 58:4
confidence 21:8	counsel 2:4	6:25 7:2,2,3,6	11:19 63:19	disasters 72:12	editor 8:13,13	encourage 28:21
conjunction 22:12	10:12,13,14	9:10 16:14	demonstrate 26:16 27:8	72:14	9:6,8,16,21	encouragements 73:3
connected 41:8	15:13,19 16:16	17:8 27:5 32:3	demonstrated 50:4,12	disciplinary 34:3	10:8,15,17,19	encouraging 29:12
Conservative 58:11	72:24	32:4 36:4,14	department 22:22	discipline 34:3	10:22,25 11:14	endeavour 62:22
consider 27:14	country 54:22	40:11 42:4	depend 7:5 35:17	disclose 38:3	15:11,11 20:24	engaged 8:9
consideration 5:21 6:14 27:9	55:3 57:17	45:7,10 46:3	36:13	disclosed 24:21	20:24 21:25	engagement 65:23
considerations 47:15 50:20	58:16,24 59:3	50:3,3 58:5	depending 34:23	discover 43:10	22:19 25:20,20	England 67:19
considered 46:7	67:20	60:7,13 71:15	depends 17:17	discrete 32:22	28:9 30:24	enormous 3:12
74:24	couple 4:21,23	75:14	44:18 74:4	discuss 11:1 59:3	31:6,9,10 32:5	6:8 51:6
consult 44:25	6:17 52:10	days 16:14	deputy 8:13 31:9	discussed 14:17	32:6,8,10	enter 30:13
	course 2:5 7:12	day's 9:13	describe 33:5	25:20 31:22	35:18 36:16,19	entertain 3:1
	7:24 9:9 18:23	day-to-day 40:1	36:5 43:12	40:15 59:1	37:15,18,19,22	entertaining 52:8,12
	19:4 24:8 27:5	46:19	67:2	discussion 9:3	38:5,18,19,22	entirely 22:1
	28:16 33:13	deal 5:3 9:14,17	described 36:3	14:8 29:22	38:24 39:2,2,3	57:14
	38:17 46:8	13:24 19:14	71:10	38:1 41:17	39:6,13,17	
	48:20 50:24	23:2,6 32:16	description 54:15	discussions 32:9	44:25 45:2,3	
	55:9 57:9	32:17 33:12		32:13 37:24	46:14,18 47:2	
	58:13 62:20	38:25 39:5		41:15 45:8,25	47:12 50:20	
	65:2 66:6 75:8	41:3 42:21		46:2,9	58:13 65:9	
	court 8:1 11:19			disputes 72:23	66:24 71:9,23	
				73:25	74:15,17	

escalate 27:18	experience 15:6	feel 10:5 11:6	force 51:8 56:14	18:13,19 45:25	5:2 11:14	host 48:2
et 39:10 40:14,23	17:9 36:16,17	36:11 47:6	forgive 74:11	48:7 59:11	23:15,16,18	hour 10:2
73:8	explain 15:5	50:12 51:20	form 70:25	62:16,21 66:6	33:24 60:5	house 6:8,15
ethical 19:2,5	25:19	52:6 70:6	formal 30:21	God 27:22	happening 23:21	7:19 12:21
20:22,25 31:12	explaining 55:11	feeling 15:1	formerly 2:6	goes 19:25 36:21	46:9	20:3,4
44:24 45:10	explanation 65:7	16:13	forward 41:2	37:18 39:18	happens 15:7	huge 7:22,24 9:3
46:15 50:5,19	explicit 56:24	feelings 59:12	46:11 68:1	going 1:8 4:15,21	26:8 37:17	10:3 12:24
ethics 46:24	explicitly 58:7	feels 46:6,7	70:3 72:5	5:1,8,13 9:3	happy 30:14	39:25 68:14
eurozone 47:6 72:5	expose 19:8	fellow 44:15	foster 46:14,17	10:3 15:11	42:16	Hugh 1:16,20
54:24	exposed 53:17,22	59:10	found 1:7,10	16:11,19 17:19	harassment	Human 7:14
evening 9:5,12	64:8	felt 3:22 6:5 7:18	16:25 52:2	18:18,20 21:8	69:19	humorous 67:7
34:13	exposing 19:14	9:16 36:1,5	four 30:25 33:25	21:17,19,25	hard 25:21 67:10	humour 67:12
event 26:16	54:6	37:13,14 47:16	frank 65:7	23:24 24:24	67:11	hurdle 38:11
51:19	express 2:15,19	49:6 54:5	freelance 44:21	29:3 32:15	Harry 51:18	
events 3:16 5:19	3:8,12,18,20	58:15,24 59:4	frequent 40:3	38:6,12 40:12	head 18:5 33:19	I
everybody 29:6	4:1 42:25	59:10	57:16,18	45:14 62:25	44:25 70:13	idea 59:7,7,8
43:21 72:8	43:15	females 47:24	Friday 60:6	64:15 66:6	72:9	72:21 73:15
evidence 1:6,7,9	expressing 70:19	Fergus 32:4	front 12:20	67:10,17,18,25	headline 10:9	ideas 69:9
25:9 30:21	extent 6:18 11:4	39:14	16:17 17:4,4	74:11	13:17 36:3,6	identified 5:20
34:11 37:8	55:12	field 68:23 69:6	17:18 35:23	gold 28:7	40:14 42:3	34:4
38:14 61:25	extra 13:18	70:9	36:14 40:13	good 3:1 32:6	54:14 68:15	identify 50:8
64:21 74:12,13	extremely 1:11	fifteen 29:21	41:24 42:3,12	33:22 40:13	headlines 12:7	74:14
evidential 24:22	19:6 53:7	figure 51:11	42:14 48:6	44:21,22 47:3	13:4,7 26:23	identifying 45:17
evolve 47:13	ex-directory	62:19	49:16 50:10,16	49:14 51:9	hear 23:10,14	identity 68:14
evolves 47:17	43:10	figures 50:3	52:9,12 57:6	54:13 55:22	29:15 40:8	illegal 19:20,21
evolving 46:2	ex-editors 73:22	file 1:21 25:7	59:20 60:5	58:22 63:21	heard 27:5 33:13	20:14 21:5
69:15	eyes 36:25	30:18	68:15	65:13	38:5 40:2	immediately
ex 27:21 28:1	F	files 15:19	front-page 61:15	Goodman 22:12	41:15 45:16	69:20
exact 63:14	face 68:7 70:22	fill 74:2	full 1:19 30:10	23:10	70:17 72:15	immensely 10:2
exactly 19:9	Facebook 68:8	final 8:20 10:23	35:6 61:16	goodness 26:3	hearing 75:14	impact 7:15,17
example 6:7	fact 2:8 4:16 5:1	26:10 59:7	fully 20:9 60:21	Gordon 71:23	hearsay 18:11	7:20,20 12:24
11:23 12:15,16	16:25 20:15	finally 66:23	fun 52:8	governance	heart 40:12	13:10,11 49:16
18:6 19:1,4	42:1 52:3	find 1:21 9:6,12	furore 68:11	33:23	68:16	49:20 57:3
20:18 24:16	63:23 67:4	27:19 45:15	further 41:6	gradual 8:6	heat 46:10	impacted 56:15
35:22 41:16	facto 27:21 28:1	62:10 65:16	fuss 70:20	graph 5:13 6:1,2	heir 66:19	implications
43:10 44:13	Factor 48:2	finding 48:17	future 5:24 69:9	grateful 1:5,12	held 31:7 44:4	46:5 73:12
47:20,25 51:9	50:15 67:18	fine 75:5	69:11	great 15:22 23:2	help 51:4,10,20	important 3:16
54:4,10	Factor's 50:14	firm 70:2	G	23:6 35:10	51:21	3:24,24 8:8,15
examples 18:1,7	facts 16:5 17:20	first 1:18 6:11	game 15:18	43:21 47:13	helped 53:20	27:8 33:6 51:7
50:25 51:4	29:2	11:25 15:21	gathered 55:19	69:21 70:19	helpful 38:13	53:7,11 67:12
52:21 53:13	fair 3:4 28:2 29:5	30:12 35:14	general 2:18	group 2:4 6:11	helpfully 13:22	impression 5:4
72:14	45:12 60:15	37:11 38:5,11	6:17 20:20	11:9 59:10	helping 55:13	21:15
exceeded 52:1	fairly 27:18	40:5 42:6 51:4	24:4 36:12	growing 5:11	heroes 51:5,10	improved 23:6
exciting 4:14	32:11 64:5,17	52:25 53:21	44:11,16 66:23	guidance 44:24	55:13	including 31:13
10:1,4	65:14 71:16	55:4 56:4 60:5	generally 20:12	guilty 34:14,14	he'll 39:8 40:21	incorporation
excluding 71:8	fall 44:1	63:11 71:12	49:13 69:13	35:2	hidden 61:17,18	7:13
exclusive 49:14	fallen 26:18	firstly 44:9	gentle 5:15 6:1	gypsies 32:23	hierarchy 39:21	increase 49:13
50:9 61:15	falls 44:17	five 38:16	gently 5:14	33:10	Higgins 74:12,15	49:22 68:4
65:25 67:21	families 52:5	flagrant 48:16	getting 18:10	H	high 15:17 46:15	independent
exclusives 63:11	famine 53:1	flashing 34:19	35:15 73:24	hack 63:23 64:4	52:21 57:16	37:22 64:13
executive 32:4	famous 57:7	flavour 11:4	Giggs 68:11,16	hacked 64:10	highest 57:20	indication 5:13
32:10 37:18,25	far 15:22	35:13	give 6:22,23	hacking 23:11	hindsight 23:4	indifferent 65:13
38:24 39:3,11	fascinating	Fleet 3:21 5:6,12	10:13,14,14	63:2 64:17	history 52:12	65:14
39:13,23 43:1	35:25	51:25 64:22	11:4,5 15:4	Hadron 52:16	hit 3:1 13:7	individual 34:20
43:5,16	faster 8:7,7	flexible 43:2	18:2 19:1,2	Haiti 53:3	HIV 32:22	36:14,14 44:18
executives 59:10	father 52:19	focus 17:20	35:13,22 36:11	Hamilton 74:12	hold 47:3 52:9	53:24 54:19
exercise 20:20	fault 14:2,7	focused 6:18	47:20,25 50:25	74:16	71:22	individuals
exerted 58:21	favourable 18:16	following 53:10	given 1:25 11:10	hand 59:22	holiday 51:23	35:24 56:17
exhibit 42:6,6	36:9 49:16,20	follow 45:16	21:15 25:11	Handed 59:24	honest 4:7 28:2	71:17 72:3
51:4	favourite 73:4	following 7:13	27:9 28:5	handheld 68:4	honesty 46:15	individual's 52:4
exist 28:13	fear 16:1 56:7	7:16 22:12	29:11 61:3	handled 21:25	honour 51:17	industry 64:19
existence 57:12	74:2	36:4 42:4 60:7	gives 54:25	hands 70:18	hope 8:22 11:18	64:20 68:25
exists 25:9	fearful 70:5	75:14	giving 5:25 8:10	happen 18:14	11:23 21:1	69:3,16
expect 22:1	features 31:9	follow-up 41:25	go 6:5 9:5 12:4	19:2 29:4 45:1	66:6	inevitably 53:10
46:23	feedback 35:14	footballer 36:24	15:2,4,12	58:14 73:19	hopefully 47:7	infer 70:24
expects 9:16		68:13	16:19 17:13	happened 4:1,15	horrified 5:21	influence 3:23
		football-mad 3:3			hospital 33:6	40:24

information 12:8 12:13 44:9	71:24	56:2 62:13 69:9 70:14 74:9,10,11,15 74:20 75:2	justification 49:6 Justin 1:14,16,20	lead 16:2 leader 39:15 leadership 66:24 leaked 18:15 learn 49:23 55:7 learned 37:1 learnt 47:18 left 2:9 20:4 legal 2:4,7,9 8:25 9:13,15 13:25 19:5,17 20:23 21:3,5 22:13 23:5,7 25:11 25:14,16,18 26:2,9 28:16 39:5 44:5 45:10 55:20 70:1	lie 24:8 lies 44:9 life 13:18 31:21 67:3 lifeguard 36:2 light 33:23 limitation 27:17 limited 2:4 23:11 line 37:23 71:6 71:13 lines 54:25 63:15 64:14 link 50:21 list 35:23 little 5:15 24:21 31:19 32:15 40:5 51:14 57:13 60:18 61:14 lives 52:4 living 47:16 lob 4:9 lobbing 4:12 long 40:20 60:2 60:15 61:21,21 65:3 longer 5:15 26:4 42:24 longest 61:22 look 13:8,12,13 20:24 26:16 27:13 35:4 36:20 42:5 55:16 66:4 71:18 looked 8:24 54:18 looking 13:9 22:25 23:8 25:6 26:22,22 47:10 50:2 72:5 looks 17:22 66:10 LORD 1:3 3:10 3:15 4:9,20 5:13 6:16 9:19 11:3,17 12:14 14:6 15:21,25 16:19,22 17:10 17:13 21:20,23 24:20 25:18,25 27:2,20 28:4 28:12,16,19,24 29:12,17,20,24 30:4,12 37:3 37:17,21 38:2 39:1,13,17,20 43:18 45:15 46:4 48:9,15 48:20,23 49:1 49:10 53:7 55:8,21,25 62:10 69:4,7 70:10,15 72:4 72:7,10,19 73:10,21 74:4 74:10,13,18,21 75:3,7,10 liaise 39:11 liaison 32:1 libel 2:14 8:17 10:25 13:5 14:12 15:3 21:13 24:16 26:12 27:17 libel-read 4:11 8:24 licences 53:23	74:10,13,18,21 75:3,7,10 Lords 6:8,15 7:19 12:21 losses 68:6 lost 26:7 lot 1:11 35:19,20 36:18,25 39:6 39:7 40:21 45:7 56:21 65:25 67:10 71:25 lots 38:6 lunchtime 46:21 lying 36:24
informative 67:12	intricacies 61:7 introduced 70:7 Invariably 26:4 investigation 64:10 investigators 42:22 43:4,8 43:22 involve 45:20 56:16 57:20 involved 9:11 14:24 32:9 36:22 39:5 52:23 60:11 70:12 71:17 72:13 73:2,24 involvement 32:13 39:25 58:10 involves 21:12 33:25 48:22 52:14 involving 50:1 65:17 in-basket 9:1 in-house 9:17 11:8 Ipad 40:19 66:8 Irish 64:9,11 isolation 38:22 issue 6:18 8:14 9:17 11:25 12:4 13:2 16:7 20:22,23 22:7 39:9 40:15 42:21 45:5,6,8 63:2 64:7 69:18 issues 6:19,21,24 9:7,14,16 11:1 15:9 19:18,19 22:14,18 31:23 32:22 33:4 38:4,7 39:5,6 40:10 48:11 52:16 55:2,7 56:3 58:5 67:23 72:25 Italian 34:12 iterative 45:19	Jay's 3:11 Jefferies 72:13 job 17:13 52:6 53:12 jobs 44:1 52:2 John 40:15 joined 2:10,15 6:11 37:11 52:19,25 joke 63:18 65:8 journalism 15:2 63:20 65:8 journalist 9:9 19:6,8,11,17 19:25 22:2 40:11 43:20 44:15,22,24 journalists 22:11 31:13,20 43:23 44:1 judge 16:11,17 16:23 17:7,18 17:21 41:18,21 42:2,11,15,15 42:18 73:23 judges 17:4,5 73:21 judgment 7:18 8:2,5 12:21 judicial 17:13 41:19 July 54:15 56:7 56:15 jumps 6:4,5,6 junior 8:19 jurisprudence 7:13 justice 1:3 3:10 3:15 4:9,20 5:13 6:16 9:19 11:3,17 12:14 14:6 15:21,25 16:19,22 17:10 17:13 21:20,23 24:20 25:18,25 27:2,20 28:4 28:12,16,19,24 29:12,17,20,24 30:4,12 37:3 37:17,21 38:2 39:1,13,17,20 43:18 45:15 46:4 48:9,15 48:20,23 49:1 49:10 53:7 55:8,21,25 62:10 69:4,7 70:10,15 72:4 72:7,10,19 73:10,21 74:4 74:10,13,18,21 75:3,7,10 justifiable 71:13	K Kate 51:18 keep 25:7 Kelvin 4:12 Kelvin's 4:17 kill 18:12 killer 50:1 kind 45:8 58:25 69:7 kit 67:17 kite 73:4,6,9,12 73:14 knew 64:4,16 68:18 knock-on 73:7 know 6:12 11:22 12:19,20 15:11 16:9,10 18:10 20:1 23:17 26:10 29:1 31:7 34:13 36:8,13 40:11 40:12 42:8 44:10,16 45:6 46:23,24 53:2 55:3 57:7 60:15 61:2,2,5 62:11 65:20 69:5 72:20 knowledge 14:21 43:9 known 24:1 59:12 63:4 64:6 Knox 34:8	legality 12:24 legalling 7:1,3 legally 44:4 legitimate 44:3 leg-in 25:15 28:14 length 41:23 74:22 letter 34:7 62:11 letters 13:17 35:11 52:3 Let's 74:14 level 68:22 69:6 70:8 LEVESON 1:3 3:10,15 4:9,20 5:13 6:16 9:19 11:3,17 12:14 14:6 15:21,25 16:19,22 17:10 17:13 21:20,23 24:20 25:18,25 27:2,20 28:4 28:12,16,19,24 29:12,17,20,24 30:4,12 37:3 37:17,21 38:2 39:1,13,17,20 43:18 45:15 46:4 48:9,15 48:20,23 49:1 49:10 53:7 55:8,21,25 62:10 69:4,7 70:10,15 72:4 72:7,10,19 73:10,21 74:4 74:10,13,18,21 75:3,7,10 liaise 39:11 liaison 32:1 libel 2:14 8:17 10:25 13:5 14:12 15:3 21:13 24:16 26:12 27:17 libel-read 4:11 8:24 licences 53:23	M machine 25:22 66:9 Mail 34:10 main 13:24 major 6:25 9:13 9:15,17 majority 9:2 15:7,22 54:22 making 5:9 12:9 12:12 15:21 56:18 manager 2:7 managing 20:24 22:11,19,22 32:5 37:12,15 37:18 38:18,22 39:2,4,6 44:25 45:2,3 Manchester 3:4 manifestation 69:12 manner 18:16 Margaret 63:4 mark 73:9 market 3:2 54:20 marking 73:5 marks 9:3 25:15 25:16,18 26:9 28:16 73:6,12 73:14 marriage 44:5 mass 54:20 massive 4:24 5:6 68:4 material 17:17 24:17,24 25:2 25:3,13 70:24 matter 9:14 11:16,22 14:14 16:12,25 20:25 21:9 44:24 60:12 matters 3:22 4:3 6:12 13:21 16:4 18:20 21:24 23:5 27:12,18 71:25 McCanns 72:13 McKenzie 37:5 40:2	
input 10:7 21:1,4 22:3 24:9,13 Inquiry 5:1 6:17 18:1 30:13,22 41:11 53:10 56:6 57:3,12 62:2 68:21 69:11 71:6,18 72:15 74:25 insistent 19:24 instance 15:18 35:20 39:8 40:22 50:14 57:6 71:19 73:4 instruct 15:13 instructed 10:12 instructions 10:22,24 integrity 46:15 intellectual 21:12 intense 17:20 interest 11:2 12:2,11 17:24 18:3,7,18 20:16 26:14,14 26:18 27:10 31:22 35:20 40:22 45:17 54:5,5,11,18 54:21 55:9,10 55:14 56:16 66:16,17 interested 14:9 17:14 29:15 38:4 40:10,17 40:20 67:17,22 71:2,12 73:14 interesting 29:2 53:19 72:17 interests 67:16 72:11 interfere 41:1 internal 33:15 38:9 International 2:20 42:25 43:15 Internet 67:15 68:7,22 69:2 70:9 73:13 interrupt 5:14 39:1 interviewed	J jailed 53:24 James 30:7,11 39:23 50:1 Jay 1:14,17,18 5:15 6:16,17 11:3 13:21 14:11 17:22 22:4 25:6 26:10 28:5 29:18,21,25 30:5,8,9,17 37:20 38:14 39:21 46:11 49:11 53:14	lax 64:8	lead 16:2 leader 39:15 leadership 66:24 leaked 18:15 learn 49:23 55:7 learned 37:1 learnt 47:18 left 2:9 20:4 legal 2:4,7,9 8:25 9:13,15 13:25 19:5,17 20:23 21:3,5 22:13 23:5,7 25:11 25:14,16,18 26:2,9 28:16 39:5 44:5 45:10 55:20 70:1 legality 12:24 legalling 7:1,3 legally 44:4 legitimate 44:3 leg-in 25:15 28:14 length 41:23 74:22 letter 34:7 62:11 letters 13:17 35:11 52:3 Let's 74:14 level 68:22 69:6 70:8 LEVESON 1:3 3:10,15 4:9,20 5:13 6:16 9:19 11:3,17 12:14 14:6 15:21,25 16:19,22 17:10 17:13 21:20,23 24:20 25:18,25 27:2,20 28:4 28:12,16,19,24 29:12,17,20,24 30:4,12 37:3 37:17,21 38:2 39:1,13,17,20 43:18 45:15 46:4 48:9,15 48:20,23 49:1 49:10 53:7 55:8,21,25 62:10 69:4,7 70:10,15 72:4 72:7,10,19 73:10,21 74:4 74:10,13,18,21 75:3,7,10 liaise 39:11 liaison 32:1 libel 2:14 8:17 10:25 13:5 14:12 15:3 21:13 24:16 26:12 27:17 libel-read 4:11 8:24 licences 53:23	lie 24:8 lies 44:9 life 13:18 31:21 67:3 lifeguard 36:2 light 33:23 limitation 27:17 limited 2:4 23:11 line 37:23 71:6 71:13 lines 54:25 63:15 64:14 link 50:21 list 35:23 little 5:15 24:21 31:19 32:15 40:5 51:14 57:13 60:18 61:14 lives 52:4 living 47:16 lob 4:9 lobbing 4:12 long 40:20 60:2 60:15 61:21,21 65:3 longer 5:15 26:4 42:24 longest 61:22 look 13:8,12,13 20:24 26:16 27:13 35:4 36:20 42:5 55:16 66:4 71:18 looked 8:24 54:18 looking 13:9 22:25 23:8 25:6 26:22,22 47:10 50:2 72:5 looks 17:22 66:10 LORD 1:3 3:10 3:15 4:9,20 5:13 6:16 9:19 11:3,17 12:14 14:6 15:21,25 16:19,22 17:10 17:13 21:20,23 24:20 25:18,25 27:2,20 28:4 28:12,16,19,24 29:12,17,20,24 30:4,12 37:3 37:17,21 38:2 39:1,13,17,20 43:18 45:15 46:4 48:9,15 48:20,23 49:1 49:10 53:7 55:8,21,25 62:10 69:4,7 70:10,15 72:4 72:7,10,19 73:10,21 74:4 74:10,13,18,21 75:3,7,10 liaise 39:11 liaison 32:1 libel 2:14 8:17 10:25 13:5 14:12 15:3 21:13 24:16 26:12 27:17 libel-read 4:11 8:24 licences 53:23	74:10,13,18,21 75:3,7,10 Lords 6:8,15 7:19 12:21 losses 68:6 lost 26:7 lot 1:11 35:19,20 36:18,25 39:6 39:7 40:21 45:7 56:21 65:25 67:10 71:25 lots 38:6 lunchtime 46:21 lying 36:24	

mean 7:2 13:2 21:5 25:19 27:3 33:3 36:13 39:24 40:7,14 45:25 46:9 47:13 48:11 49:5,21 50:14 51:22 55:19 57:5 59:9 62:22 63:16 66:10,17 71:15	47:19 Mitch 52:19 mix 67:11 mixture 59:9 Mm 29:7 48:25 54:1 59:15 60:9 73:20 74:5 mobile 63:24 64:9 modern 67:3,7 Mohan 30:6,7,11 30:12,17,24 41:3 43:3 45:14 46:11 50:7 51:3 53:16 54:11 56:3 60:2 62:1 62:6 65:6 70:14 74:6 75:11	negative 53:9,11 72:2 neglected 51:14 negotiated 61:8 negotiation 42:2 61:25 never 23:20 41:1 41:6 48:21 nevertheless 11:15 new 2:9,10 7:1 33:17,21 43:6 56:12 news 2:4,6,20 5:2 6:11 7:5 9:8 22:13,18 22:20 23:12 25:20 33:24 34:19 35:6,18 42:25 43:15 45:9 46:10,20 49:7	52:24 56:3 63:24 67:5 70:1 numbers 43:10 <hr/> O <hr/> oath 23:19 objection 75:7 obligation 48:16 obvious 19:23 32:25 48:5 63:16 obviously 1:11 4:24 8:13,18 11:1 14:9 20:1 20:6 21:22,24 27:17 33:9 39:4 40:10 41:15,22 47:14 47:24 48:4 49:1 51:22 54:7 55:19 56:19 66:17,20 68:9,13 69:23 70:4 71:21 72:6,16	operation 46:10 opinion 8:20 18:2 28:2 47:4 optional 73:25 order 28:22 orders 11:19 ordinary 12:19 organisation 39:12 47:1 organisations 46:25 organised 22:19 22:21 organises 22:10 organism 47:16 original 8:1 24:14 41:7,12 ought 23:25 outcome 32:14 34:24 outside 12:20 56:4 Ouzo 54:15 overcome 29:9 overregulated 69:1 overturned 8:1 overwhelming 54:11 owe 54:15 o'clock 9:6 26:20 26:21,21 75:12 75:14	59:13 paragraphs 12:13 26:1 35:7 45:12 53:15 parents 60:10,14 part 1:12 6:25 part 14:24,25 31:14 53:11 64:10 72:4 74:24 partake 10:6 partially 59:17 60:21 participants 1:5 62:8 participate 73:16 participated 71:5 particular 7:5,13 7:16 8:19 9:10 12:12 14:17,21 14:23 36:17 53:17 65:16 71:6 particularly 1:7 11:22 12:13 16:10 33:3 49:15 50:9,23 51:2 54:10 63:21,25 partly 24:15 partnered 53:3 partnership 52:19 parts 33:7 60:23 party 58:8,11 pass 17:8 42:17 passing 53:14 passionate 14:9 paste 65:22 patients 33:5 pattern 4:20 pay 35:11 paying 33:18 PCC 20:25 22:12 22:14,23,24 23:3,3 27:11 31:21 32:2,6 32:16 38:12 39:5,16 42:2 42:17 45:5 46:4,8 47:22 48:8 60:10,16 61:4,8,16,25 69:12,17 70:3 72:18 peanut 65:22 penetrable 63:25 people 5:3,9,21 8:19 11:20 14:22 21:18 23:14,14,17,17 23:24,25 27:5 33:2,7 41:11 43:25 46:23 47:5 49:23	54:22 55:3,4,6 67:24 68:18 69:3 72:11 73:2 people's 67:16 69:16 percentage 6:20 7:6 36:11 perception 16:11 17:6,15 18:9 18:16 58:19 perform 50:15 performed 37:15 period 3:18 4:14 5:11 7:23 35:2 36:21 permanent 46:1 permission 42:25 43:5,16 person 3:3 19:10 19:11 personal 71:25 personality 67:22 personally 16:25 17:20 48:2 personnel 51:17 person's 26:6 Pete's 25:24 phenomenon 34:15 phone 23:11 35:11,17 63:2 64:16 phones 63:24 64:11 photograph 10:10,14 12:14 12:17 phrase 55:9 pick 19:13 37:3 picked 6:3 8:4 picture 6:22,23 12:7,8,19,24 36:23 pictures 11:20 13:3,18 piece 12:8 45:22 65:16,21 66:10 pieces 12:13 59:18 PIN 63:24 pinning 67:4 pitch 36:24,25 place 10:1 15:15 15:16 20:7 24:2 26:20 32:21,24 43:6 50:10 51:16 57:22 placed 41:6 play 6:24 67:19 playing 68:23 69:6 70:8 please 30:6,9,10 33:20 35:13 46:11 69:13
mediation 69:24 70:2,2 72:17 mediator 69:17 meet 15:20 57:18 meetings 46:21 meets 10:24 member 34:6 41:20 members 73:22 mention 1:9 mentioned 7:9 7:17 28:14 merits 54:8 met 34:4 69:20 method 20:13 methods 64:20 Middleton 51:19 mightn't 27:3 military 57:25 mill 64:22 millies 51:15 55:13 million 51:10 52:1 53:4 67:24 68:17 71:15 millions 51:23 52:24 54:21 55:6 mind 53:14 mine 21:16 59:10 Minogue 48:1,6 49:12 minute 4:5 66:8 minutes 15:16 29:22 mirror 58:19 63:13,19 64:8 65:9 Mirror's 63:11 64:18 65:8 misbehaviour 55:22 misjudge 49:21 mistake 37:2 mistakes 47:18	moment 5:7 46:6 46:6 49:11 50:19 month 40:9 months 5:19 30:25 49:25 68:3 mood 59:3 Morgan 65:9 morning 1:4 4:19 40:2 45:9 46:20 62:5 mortal 68:24 Mosley's 14:18 move 41:2 46:11 moved 2:16 37:12 movement 5:15 moving 24:5 Murdoch 39:23 40:3 59:2,12 musts 26:2 mutually 67:20 <hr/> N <hr/> name 1:19 30:10 68:13 Naomi 6:7 7:11 7:18 12:3 nation 58:23 national 2:23 3:16 50:21 nature 35:17 44:11 65:12 nearly 11:7 necessarily 16:23 necessary 45:4 necessity 37:16 need 7:1,3 14:3 29:9 33:21 37:7 46:1 68:8 needed 4:3 needn't 54:3 needs 20:6 44:24 69:23	newspaper 2:4 3:6 6:10 11:9 12:6,25 14:20 21:18 26:22 29:1 39:25 41:7 47:2,16 48:6,8,15 50:17,21 53:6 55:4 67:1 68:25 71:9 newspapers 2:19 2:23 3:8 4:1 9:25 18:15 48:19 54:20 56:22 67:6,13 68:5 73:5 newsroom 30:13 46:22 NGN 2:16 nice 59:23 night 24:13 25:11 Nods 33:19 70:13 72:9 normal 32:11 61:12 normally 27:19 66:21 note 25:23 28:8,9 37:5 noted 36:6 notes 25:10 notice 61:3 noticed 68:4 notices 69:18 notification 15:10,12 notify 14:22 November 65:17 65:20 nuanced 48:12 number 7:24 15:3 16:1,3 17:1 31:3,21 33:4 36:4	occasion 36:16 57:19 occasions 11:13 32:5 40:8,18 occupied 38:16 occurring 64:17 occurs 8:18 oceans 4:25 October 1:22 7:16 30:18 32:20 34:6 58:12 odd 61:14 offending 41:12 offered 73:4 office 37:12 39:4 41:19 57:16,20 officer 39:23 43:1,5,16 official 53:22 Oh 25:25 27:6 42:10 Okay 32:12,15 34:3 35:8 38:25 42:18 44:23 50:25 57:14 58:10 61:24 62:12 63:1 65:1,15 ombudsman 37:6,11 38:1 38:14,19 once 2:8 10:19 73:17 one's 3:23 24:17 one-on-one 58:1 one-year 27:17 ongoing 68:11 online 34:6 open 36:25 70:6 71:25 74:3	operation 46:10 opinion 8:20 18:2 28:2 47:4 optional 73:25 order 28:22 orders 11:19 ordinary 12:19 organisation 39:12 47:1 organisations 46:25 organised 22:19 22:21 organises 22:10 organism 47:16 original 8:1 24:14 41:7,12 ought 23:25 outcome 32:14 34:24 outside 12:20 56:4 Ouzo 54:15 overcome 29:9 overregulated 69:1 overturned 8:1 overwhelming 54:11 owe 54:15 o'clock 9:6 26:20 26:21,21 75:12 75:14 <hr/> P <hr/> page 18:25 35:23 36:14 40:13 41:8,9,13,14 41:24 42:3,4,6 42:7,12,12,14 48:6 49:16 50:10,16 52:9 54:2 57:6 60:6 60:6,8,8,18 61:6,16,18,19 68:15 pages 47:8 52:12 paid 10:17,18 paper 8:23,24 9:7,13 10:3,9 13:16,16 21:18 33:7 36:23 39:15,18 45:23 47:7,8 66:25 67:2,6 papers 31:3 37:21 paragraph 8:11 13:22,24 18:24 19:13 22:5 24:5 31:17,20 32:16,17 33:12 33:17 34:3 38:25 41:2 42:22 44:7,23 46:11 50:25 53:16,25 54:13	part 1:12 6:25 part 14:24,25 31:14 53:11 64:10 72:4 74:24 partake 10:6 partially 59:17 60:21 participants 1:5 62:8 participate 73:16 participated 71:5 particular 7:5,13 7:16 8:19 9:10 12:12 14:17,21 14:23 36:17 53:17 65:16 71:6 particularly 1:7 11:22 12:13 16:10 33:3 49:15 50:9,23 51:2 54:10 63:21,25 partly 24:15 partnered 53:3 partnership 52:19 parts 33:7 60:23 party 58:8,11 pass 17:8 42:17 passing 53:14 passionate 14:9 paste 65:22 patients 33:5 pattern 4:20 pay 35:11 paying 33:18 PCC 20:25 22:12 22:14,23,24 23:3,3 27:11 31:21 32:2,6 32:16 38:12 39:5,16 42:2 42:17 45:5 46:4,8 47:22 48:8 60:10,16 61:4,8,16,25 69:12,17 70:3 72:18 peanut 65:22 penetrable 63:25 people 5:3,9,21 8:19 11:20 14:22 21:18 23:14,14,17,17 23:24,25 27:5 33:2,7 41:11 43:25 46:23 47:5 49:23	

75:2	9:22 29:21	problem 5:16,18	55:10,14 56:16	16:6 17:1,14	reclassified	representatives
plenty 7:1	34:18,23 35:23	16:22 17:1	66:16,17 73:22	21:20 27:8	43:19	48:3
plot 46:21	preparing 32:20	26:25 29:7,8	75:1	34:13 35:25	recognise 28:3	reprimanded
pm 1:2 30:1,3	32:20	45:21 73:12	publication 32:2	36:25 40:15	29:6	34:20
75:13	prepublication	problems 8:19	49:6,12	45:5 48:10	recollection 7:21	reputation 44:22
point 15:21	14:12	15:3 29:9	publications	50:15 57:7	62:18 64:12	require 73:16,17
18:24 19:5,5,9	presence 46:22	55:15	73:8	67:2,14,24	record 24:18,25	requirement
19:23 22:9	presented 13:7,9	procedure 33:23	publicly 30:14	69:25 70:5	25:7,16 26:23	73:2
27:11 34:9	presently 28:13	33:25	public/private	73:4,10	44:21	requirements
49:3 56:18,23	press 11:15 29:5	procedures 34:4	26:17	quote 41:16	recorded 28:10	66:12
58:2 72:17	40:16 56:5	process 11:25	publish 25:4		63:9	research 62:6
75:5	64:15 68:22	33:18 45:19	41:24 48:15	R	records 25:7	resolution 72:22
points 16:5	69:1,10 70:9	produce 29:1	56:19 66:2	racism 40:15	recreate 52:11	73:24
police 20:8,10	70:19,22 71:5	produced 13:11	published 27:15	radically 4:13	reference 42:12	resolve 72:25
57:25	pressed 34:18	52:11	41:9 57:2	raise 17:15 31:22	59:16,18 63:23	resolved 62:15
policies 33:15	pressure 10:19	production	60:17 61:6,23	raised 12:18 51:6	referring 64:2	resolving 70:1
policy 57:1	58:21	36:23	65:16,20 74:25	51:10,12 52:24	reflected 58:18	respective 39:3
political 58:8	pressured 10:2	products 40:19	publishes 2:5	53:4	reflects 67:21	respond 17:16
politicians 57:15	presumably 8:14	professional	publishing 11:20	raises 19:17	refresh 66:5	18:12
57:19	22:15 32:21	3:21	34:7 57:9	ran 42:2 57:6	refusing 65:22	responsibilities
popular 53:5	50:2	professionalism	purchased 19:8	range 27:24	regard 6:9 15:10	13:25 14:11
position 2:3 15:5	pretty 58:22 72:1	4:8	19:11,16 20:2	38:20	15:13 18:8	33:2,7 38:20
15:8 16:15	prevent 16:18	professionally	purchasing 19:6	rape 11:21	21:24 22:18	responsibility
20:9 30:24	57:9	13:11 50:24	19:25	rate 12:18	23:1 24:15	21:23 24:8
37:9 38:17,18	prevented 71:14	professions	purely 63:18	rates 73:7	27:12	44:8
42:18,24 43:1	previously 2:5	35:25	purpose 19:20	rationalisation	regarding 67:8	responsible 39:6
45:11 49:13	pre-notification	Professor 52:14	33:1 58:3	27:21	71:21	39:17 66:9
64:14 68:12	14:15 16:1,4,8	52:15	purposes 20:5	reach 45:21	regard 6:9 15:10	responsibly
positions 1:7	pre-notify 15:23	profile 51:12	36:6	reached 27:25	15:13 18:8	20:10
positive 53:8	17:2	prominence 61:8	pushed 9:1	28:1 42:1	21:24 22:18	rest 29:3
positively 73:13	pre-notifying	61:15	put 3:7 8:25	read 18:23 32:18	23:1 24:15	restrictions
positives 53:12	17:25 18:4	promotions	11:18 12:14,17	45:14 53:16	27:12	68:19
possession 19:19	price 51:23	51:24	16:16 17:4,18	54:23,24	rejected 11:5	result 34:19
possible 16:9	primarily 7:20	promulgated	18:5,12 23:5	readers 35:8,10	56:21	47:23 56:21
18:6 25:12	primary 24:17	61:4	25:21 26:14	36:4 37:6,22	related 6:19	58:25 61:24
27:19 62:23	Princes 51:18	proper 27:9 61:3	34:14 40:13	38:19 51:21,23	relation 8:10	68:6 70:20
64:4 70:24	Princess 3:15	properly 4:3,3	41:12 47:5	52:2,3,17 67:9	25:6 34:10,15	resume 75:11
possibly 7:4 9:5	63:4	24:12 71:3	49:15 55:22	67:10 71:15	41:5 47:3	return 16:15
12:24 27:7,25	print 36:23	property 21:12	62:9,13 74:25	72:1	49:12 56:9	reverting 5:17
post 27:21 28:1	48:21 61:20	proportion	puts 26:1	readership 35:15	61:1 63:12	5:18
31:8	68:12	62:20	putting 39:7	58:17,20 59:4	69:14	re-release 53:1
potential 55:15	printed 47:24	proposed 26:22	73:15	71:10	relationship	Rhodri 1:10 75:3
66:19 69:18	49:8 64:7	proposition 47:3		readily 64:5,5	11:10,11 65:12	Richard 32:5
potentially 68:24	prior 15:10,12	55:18	Q	reading 8:18	relationships	right 4:9 7:25
powerful 51:8	32:2	prosecuted	qualities 46:17	10:25 12:20	32:6	8:12,17 9:19
practical 28:6	priority 67:25	19:10	quality 63:20	14:12 37:4	relatively 27:16	9:23 11:24
29:8,8 32:8	privacy 4:24	prosecuting 20:5	quantity 35:14	ready 34:12	release 53:3	12:1 16:6,12
practicalities	6:12,14,19 7:9	prosecution 20:6	Queen's 72:24	real 7:17 31:21	relevant 54:2	18:22 21:6,14
27:14	7:12,22 8:7	protect 70:23	question 2:17	51:8	68:9	24:23,23 26:6
practice 6:9,10	11:22 13:3	72:11	3:11 12:6	realisation 4:2	relief 53:4	28:10,22 31:1
32:11	15:8 16:7 17:3	prove 24:18,25	17:22 22:4	realised 68:17	relish 73:15	31:15,23 32:1
practices 24:2	17:18 21:12	25:3	24:4 26:10	really 3:1 4:3,21	rely 24:25 26:24	34:22 37:4,8
practised 2:14	26:12,12 45:6	provide 21:21	29:4,13 32:25	7:19 25:12	remember 7:25	38:20 43:2,14
praise 52:21	46:4,8 47:14	62:2	36:12 45:15,18	39:25 51:12,20	26:25 27:7	50:4,23 51:2
pre 47:21	private 16:5	provided 1:10	48:24 57:14	54:4,23,24	36:22 43:19	53:18 59:11
predecessors	26:14 31:23	51:3 53:13	59:7 63:16	58:5 60:12	61:7 63:14	60:3,14,22,25
31:6	42:21 43:4,7	60:19	questions 1:17	61:19 62:15	64:25 65:3,4	64:18 66:14
pregnancy 47:21	43:12,20,22	providing 9:20	6:17 29:18	67:9 68:2	65:24 68:12	74:5,18 75:10
71:22	56:17	45:22 66:19	30:8 38:6	71:11	remembering	rights 7:14 21:12
pregnant 47:25	privilege 28:20	public 11:1 12:1	45:17,20 60:25	reason 18:19	27:4 37:4	26:13 31:23
48:2 65:18,23	privileged 28:17	12:11 17:24	62:9 66:23	19:20 23:23	remembers	56:17
66:13,18,20	probably 2:23	18:3,7,18	70:14 74:19	reasons 5:20	25:14	right-hand 61:18
Premiership	3:20 8:10 16:4	20:16 26:13	quick 35:5 55:1	27:24	remind 33:2,6	ring 40:7
2:22,23	20:23 23:4	27:9 31:22	quickly 15:16	recast 43:25	replaced 37:7	riots 35:23,24
premier's 64:11	28:11 35:16	41:20 45:17	17:5 27:16,18	received 35:19	report 2:12	risk 5:22 9:21
prepare 16:9	48:7 67:23	49:7 54:4,5,11	73:1	36:3,25 52:21	reporter 44:9	11:17,18 21:21
prepared 1:6	68:2,17 72:20	54:18,21 55:9	quite 3:16 5:19	recess 41:21	reporting 33:3	26:12,17
					represent 53:11	

59:23 theme 59:7 they'd 54:24 63:20 thin 70:6 thing 48:10 62:24 68:10,21 things 4:13,16,18 13:5 17:16 26:8,23 35:13 67:20 think 2:21,21,22 2:24 3:2,5,8,19 3:20,25,25 4:2 4:16,18 5:1,3,5 5:7,7,10 6:2,3 6:6,13,23 7:17 7:19,20,25 8:5 9:23 12:17,25 13:1,19 15:7 16:3 17:6 18:8 18:17 19:8,9 19:13 20:4,18 20:22,23 21:3 21:9 22:25 23:2,2,3,5,8,20 25:1,12 27:11 27:13,22 28:2 28:5,11,24 29:7 31:8,15 32:11,17 34:17 34:25 36:15 37:10,14 38:4 38:8,8,13,14 41:10 42:15,16 43:2,24 45:5 45:14,24 46:18 46:23 47:11,13 47:17 48:9,9 49:5,11,21,24 51:7,9,12,17 53:4,7,9,19 54:7,13,18,20 55:25 56:11,12 56:15,23,24,25 57:11 58:15,17 58:22,23 59:9 59:16 60:11,13 60:22,23 61:22 61:24 62:4,23 63:3 64:6 65:7 65:9,17,21,24 65:25 66:3,8 66:17 67:2,5,6 67:11,13,13,15 67:21,23 68:2 68:3,5,10,21 68:24 69:1,15 69:16,16,17,24 70:2 71:3,12 71:16,18,25 72:10,16,17,20 73:3,11 74:5 74:16 75:3 thinking 45:19 45:23 69:13,15 72:4	thought 3:24 23:17 29:11 33:6,20,22 49:3 69:2,10 thoughts 29:14 thousands 69:3 threats 14:12 three 6:15 7:4 52:24 throne 66:19 tied 6:21 tightening 33:23 time 2:19 3:13 4:14,14 5:11 6:9 7:23 10:19 11:7 14:25,25 18:25,25 22:10 22:10 23:10 25:10 29:13 35:3 36:21 39:24,24 40:14 40:16 45:23 47:10 58:15,16 62:5 65:3 66:1 times 31:24 40:8 51:21 57:23 67:10,11 timing 74:10 tiny 3:8 tipsters 45:13 titles 64:18 today 30:5 57:6 74:9 told 23:24 33:13 48:3 49:11 Tom 2:9 tomorrow 75:12 tomorrow's 9:7 Toms 2:10,12 top 3:5 18:5 26:2 29:2 47:1 total 51:25 touch 13:21 14:14 33:17 tough 51:21 toughened 69:24 track 44:21 traffic 40:22 trail 26:15 45:22 training 22:7,11 22:13,15,17,21 23:1,7 31:19 32:17 39:8 52:3 transcribed 14:4 transparent 71:16 72:1 Travellers 32:23 33:9 treatment 70:18 tremendously 48:12 trends 50:3 tried 41:1 46:17 trouble 27:20 true 6:6,24 9:24 18:8 64:14	trust 11:12 26:24 truth 1:25 30:20 try 9:5,11,12 10:11,14,23 14:4,6 15:20 28:20,21 52:7 72:25 trying 4:5,6 29:1 65:5 72:23 turgid 54:23 turn 8:6 54:3 55:5 TV 50:14 57:7 twice 4:12 Twitter 68:8 two 3:11 6:15 7:4 10:2 11:23,24 16:14 26:13 30:25 34:11,22 35:1,13 40:9 59:18 60:13,23 66:7 types 25:22	<hr/> U <hr/> ultimate 20:16 21:2,13,16,17 ultimately 44:10 underlying 25:8 undermine 63:19 65:8 understand 39:2 69:23 74:1,23 understandable 71:13 undisclosed 24:21 undoubtedly 18:8 unemployment 51:25 unethical 20:14 unfair 2:17 36:5 unfortunately 34:12 37:6 unique 67:11 United 3:4 unregulated 69:2 unusual 34:22 upheld 47:23 48:8 49:9 59:17 60:21,22 60:24 69:20 71:22 upward 50:10 upwards 5:14,16 use 10:9 12:18 19:14 35:20 73:17 useful 1:8 38:8,9 uses 55:9 usually 41:10 47:2 50:15	<hr/> V <hr/> valuable 1:11	value 24:22 38:2 varies 40:7 57:23 variety 35:25 40:9 various 8:25 32:22 58:5 64:20 vast 9:2 verdict 34:8,12 35:2 41:25 version 34:17 35:2,6 59:23 versions 34:11 34:23 35:1 vetting 24:5 vibrant 67:7 victims 11:21 view 4:7 8:20 70:25 71:2 75:6 views 45:21 58:20 viii 18:24 vision 66:25 Vodafone 63:12 Vodafone's 63:10,22,24 voicemails 64:5	<hr/> W <hr/> wait 66:21 waived 28:20 Wales 3:16 Walford 1:14,16 1:18,20 18:21 22:16 24:5 28:5 29:19 33:13 41:23 45:16 walked 5:25 want 15:15,18,18 16:8,15 17:10 21:4,25 26:5 38:3 54:23 66:4 70:15 wanted 56:1 wants 10:22 11:15 warning 34:7 wasn't 4:6 23:11 35:6 36:22 37:7,15 48:3 64:2,14,21 65:10 watch 14:4,6 watching 4:15 way 3:7,17 4:8 6:10 10:12,20 12:22,23 17:15 21:15 22:2 42:16 55:2,20 59:11 67:22 68:23 70:3,22 73:18,23 Wayne 67:18 Webb 43:19 website 34:9,15	35:2 40:22 49:8 52:10 74:25 wedge 70:7 week 4:12 35:16 40:8 weeks 47:22,25 48:4,10,13,22 66:21 weigh 20:15 weighing 26:13 55:15 welfare 67:19 well-executed 54:25 went 4:4 6:8 8:3 17:4 35:2 weren't 35:1 64:23 68:19 West 4:10 we'll 45:9 75:11 we're 11:1 20:12 26:13 39:9 45:14 54:12 57:10 we've 14:17 33:13,16 56:19 57:5 61:22 68:4 69:25 wheel 8:6 white 46:10 whoever's 10:8 wholly 15:1 wide 67:16 widely 36:20 wider 54:19 Wild 4:6,10 William 51:18 win 67:18 Winehouse 52:20 Winehouse's 52:19 wiping 53:23 wish 67:4 witness 1:21 29:23 30:5 59:13 witnesses 70:17 75:4 wonder 3:10 wondered 23:15 wonderful 3:7 59:24 word 73:17 words 7:15 13:3 18:13 44:12 54:23 58:3 63:9,14 work 1:11 3:17 5:3 6:10,20,21 6:25 9:12 10:4 25:13 38:22 44:6 worked 3:12 31:3,8 working 10:1	13:1,19 24:16 45:7 47:11 54:22 65:2 works 24:12 38:23 workshops 31:25 World 2:6 5:2 22:13,18,20 23:12 33:24 worrying 29:3 69:2 worth 48:10 worthwhile 49:4 wouldn't 14:6 32:3 36:13 37:2 38:21 43:12 49:19 50:5 57:18 60:25 66:21 73:1 wounded 68:25 wrath 70:22 write 12:5 62:11 writes 39:15 52:15 written 13:6 25:7,15 31:16 33:16 wrong 6:3,22,23 16:12 34:8,14 56:25 wrongdoing 53:17 wrote 65:19 68:15,16	<hr/> X <hr/> X 25:24 27:6 48:2 50:14,15 67:18	<hr/> Y <hr/> Ye 52:9 yeah 39:24 65:11 66:5 year 1:23 17:1 19:7 32:24 48:1 51:23 52:18,18 56:15 57:24 62:14 63:21 65:17 71:24 years 3:7,11,22 4:7 6:15 23:1 27:6 30:25 38:16 47:11,18 52:12 53:24 71:20 Yelland 74:12,15	<hr/> Z <hr/> zeitgeist 58:23	<hr/> 0 <hr/> 05 3:12 07933 18:25	<hr/> 1 <hr/> 1 30:18 41:8,13 41:14 53:4 60:8 61:5 10 12:1 33:12 75:12,14 10674 42:7 10696 54:2 12 33:17 47:22 47:25 48:3,10 48:13,22 49:24 66:21 68:3 120 51:10 13 34:3 14 1:22 30:18 15 47:11 16 8:11 47:11 18 38:25 41:2 49:24 60:6 18th 59:19 19 42:22 59:19 61:1 1955 67:5 1981 2:14 1985 2:15 1994 74:15 1996 31:4 1998 64:8 74:15 74:16	<hr/> 2 <hr/> 2 7:16 30:18 35:16 41:9 42:4,9,12 60:17 61:2 2,000 52:12 2.05 1:2 2.47 30:1 2.5 52:1 20 3:7,11,22 15:16 44:7,23 46:12 20-year 3:18 2000 7:16,23 2002 7:23 63:3 65:2,6 74:16 2003 7:23 31:8 2005 2:16 6:11 2007 31:9 34:5 51:5 2008 51:16 2009 31:1,9 58:12 59:19 60:6 61:1 2010 60:17 61:2 61:5 62:13 2011 30:18 33:17 33:21 34:6 56:7 65:20 67:3 2012 67:3 23 13:22 25 3:22 15:16 27 13:24 18:24 54:15 29 19:13 46:11
---	--	---	---	---	---	--	--	--	--	--	---	---	---	--

46:13						
<hr/> 3 <hr/>						
3,000 35:16						
3-2 12:22						
3.12 30:3						
33 22:5 50:25						
38 62:14,24						
<hr/> 4 <hr/>						
4 65:20						
4.20 75:13						
<hr/> 5 <hr/>						
5 1:14 31:17 60:6						
60:8 61:16						
50,000 52:2						
500 53:23						
51 24:5						
52 53:16						
54 53:25						
56 1:21						
57 54:13						
<hr/> 6 <hr/>						
6 9:6 26:20 35:8						
61:6,18						
<hr/> 7 <hr/>						
7 26:21 31:20						
7,000 54:23						
<hr/> 8 <hr/>						
8 7:14 11:25						
26:21 32:16						
59:13 71:15						
85 3:12						
<hr/> 9 <hr/>						
9 32:17						
9.50 51:24						