

<p>1 2 (2.00 pm) 3 MR JAY: Mr Wright, the Lawrence issue. First of all, 4 paragraph 14 of your statement, please, where a senior 5 figure within the Superintendents Association made 6 a speech dealing with the repeal of the double jeopardy 7 rule, and you had some influence over him in making that 8 speech? 9 <b>A. The influence was small, possibly. There was influence, 10 I think, that prior to the -- prior to the police 11 Superintendents Association annual conference in 12 September 1997, I had a private meeting with the 13 president, and he gave details of what he was proposing 14 to put in his speech and the same thing he would have 15 said to other reporters as well, and it's just open, but 16 he mentioned that he was interested in the issue of the 17 double jeopardy laws and was going to raise a case in 18 the north-east in relation to his speech. 19 And I said, "Well, actually I'm very interested in 20 this as well in relation to the Stephen Lawrence case, 21 and if there could be a change in the law and if there's 22 suitable evidence came forward, then there might be an 23 opportunity for a retrial." As a result of that, he 24 inserted that in his speech and made a powerful 25 reference to it and used it in a slide show as well. So</b></p> <p style="text-align: center;">Page 1</p>	<p>1 sources who were speaking in an unauthorised fashion, do 2 you think? 3 <b>A. Well, I'm trying to think who I spoke to. It would 4 be -- well, it wouldn't be an officer in the presence of 5 a press officer, put it that way, that I needed to 6 understand the situation and also I spoke to other 7 individuals who had a knowledge of the case as well from 8 different aspects of life, shall we say. 9 Q. But without going into the details here, and I know you 10 won't want to, can I just explore the possible 11 motivation of these sources? Do you think their 12 motivation was a determination to bring these matters 13 into the public domain and therefore accelerate 14 achieving justice for the Lawrence family in bringing 15 these men to justice? Was that it, do you think, or was 16 it something else? 17 <b>A. No, I think I was making my own enquiries into the case 18 and they, I think, respected that I wanted to research 19 the case and be knowledgeable about it. I don't think 20 anyone could have foreseen at that stage where this 21 story would end up. I'm not going to reinvent history 22 now. 23 Q. So it's pure speculation then as to what their motives 24 might have been, because they didn't know what you were 25 going to write or how it would in the end turn out?</b></b></p> <p style="text-align: center;">Page 3</p>
<p>1 <b>I just wanted to emphasise once again the positive 2 aspects of being a crime reporter. 3 Q. And then paragraph 18 of your statement, if I may, which 4 gives us the background to the famous "Murderers" front 5 page in 1997. You were advising Mr Dacre about that and 6 obviously it was going to be his decision as to whether 7 to publish it in that way. 8 <b>A. Yes, it was. In the days and weeks leading up to that 9 front page, and I had no idea that the editor was 10 planning to do that until the eve of publication, but 11 I was making my own enquiries about the case, and it was 12 through what you would describe here as unofficial 13 sources, about the background to the case, the 14 background to the killers. There was an inquest going 15 on and it was a case we were very interested in and on 16 the eve of publication the editor sought my advice on my 17 knowledge on the background of these five. And it in a 18 small way perhaps helped him make his mind up. 19 Q. So the unofficial sources you refer to were those who 20 knew enough about the evidence, as it then existed, to, 21 as it were, make the link between the faces we see on 22 the front page and the -- 23 <b>A. Yes, I just wanted to be sure that these men remained 24 very strong suspects. 25 Q. When you say "unofficial sources", were they police</b></b></b></p> <p style="text-align: center;">Page 2</p>	<p>1 <b>A. As I say, I was interested in the case, I was interested 2 in the case and I wanted to approach the case or be able 3 to write about it, advise the editor, deputy editor, 4 whatever, in a knowledgeable way. That's all. And if 5 I hadn't been able to do that, then these matters of 6 great public interest might not have -- well, would not 7 have come to the fore. 8 Q. And your interest in the case has endured over the 9 succeeding years to the present day? 10 <b>A. That's right. 11 Q. You heard the evidence, Mr Wright, relating to the piece 12 which appeared in the Mail on 8 November 2007 -- 13 <b>A. Yes. 14 Q. -- from the police witness, Mr Driscoll. Do you have to 15 hand the online version of the article you wrote? 16 <b>A. I don't, I'm afraid. 17 Q. We'll provide you with one. 18 <b>A. Thank you. 19 Q. Mr Driscoll's evidence was that there was a high-level 20 meeting the day before, on 7 November, and some of the 21 information which was discussed at that meeting is here 22 appearing in your piece in the Mail. I know you're not 23 going to name anybody, nor are my questions designed to 24 elicit names. Are we talking about police sources in 25 the sense which I choose to use the term, namely those</b></b></b></b></b></p> <p style="text-align: center;">Page 4</p>

<p>1 in the Metropolitan Police Service?</p> <p>2 <b>A. Um ... can I just say something? This article was</b></p> <p>3 <b>actually a second article which was written, so there's</b></p> <p>4 <b>one on the preceding day which I wrote, so this is</b></p> <p>5 <b>a follow-up article.</b></p> <p>6 Q. Mm-hm?</p> <p>7 <b>A. What I'd be -- I am particularly protective of sources.</b></p> <p>8 <b>What I am happy to say, hopefully it will be accepted by</b></p> <p>9 <b>the Inquiry, was no one on that investigation team was</b></p> <p>10 <b>responsible but I'm loath to go beyond that.</b></p> <p>11 Q. So no one on the investigation team --</p> <p>12 <b>A. No. No.</b></p> <p>13 Q. Can we try and narrow it down just a little bit more?</p> <p>14 Was it a police officer?</p> <p>15 <b>A. I would rather not say so, because if we get into that,</b></p> <p>16 <b>then there's a process of elimination. I am concerned</b></p> <p>17 <b>in the current climate, I have colleagues, former</b></p> <p>18 <b>colleagues in the CRA who are been receiving what</b></p> <p>19 <b>I would call intimidating phone calls from a certain</b></p> <p>20 <b>department in the Metropolitan Police demanding to know</b></p> <p>21 <b>who sources are. I find that very concerning indeed,</b></p> <p>22 <b>even over innocuous matters. I'm very mindful about</b></p> <p>23 <b>going into detail about these matters.</b></p> <p>24 LORD JUSTICE LEVESON: Hmm.</p> <p>25 MR JAY: I may or may not come back to that. May I explore</p> <p style="text-align: center;">Page 5</p>	<p>1 <b>jeopardise a police investigation, anyway.</b></p> <p>2 LORD JUSTICE LEVESON: Well, yes, but can you disagree with</p> <p>3 the proposition that the publication of your article</p> <p>4 would have caused enormous concern within the inquiry</p> <p>5 team?</p> <p>6 <b>A. Yes.</b></p> <p>7 LORD JUSTICE LEVESON: That it was likely to cause</p> <p>8 a potential rift between the Lawrences and the police?</p> <p>9 <b>A. Right.</b></p> <p>10 LORD JUSTICE LEVESON: And that it might have an impact on</p> <p>11 one of the suspects going to one of the witnesses?</p> <p>12 I mean, I'm just --</p> <p>13 <b>A. Right.</b></p> <p>14 LORD JUSTICE LEVESON: -- repeating the facts as he told me.</p> <p>15 <b>A. Sorry, I'm trying to remember all the points you just</b></p> <p>16 <b>made there. In terms of the witness being approached,</b></p> <p>17 <b>sorry, that wasn't a consideration. In terms of the</b></p> <p>18 <b>relationship with the Lawrences, all I can say is that</b></p> <p>19 <b>my newspaper continues to enjoy a fantastic relationship</b></p> <p>20 <b>with the Lawrences -- no, I'm --</b></p> <p>21 LORD JUSTICE LEVESON: Yes, I have no doubt.</p> <p>22 <b>A. Yes, yes. And this story was a story hugely in the</b></p> <p>23 <b>public interest --</b></p> <p>24 LORD JUSTICE LEVESON: But that's the question. I'm sorry.</p> <p>25 <b>A. No, I -- yes.</b></p> <p style="text-align: center;">Page 7</p>
<p>1 it in this way, that you were satisfied, because you</p> <p>2 wouldn't have published the article otherwise, that what</p> <p>3 you were being told was, broadly speaking, correct?</p> <p>4 <b>A. I was. I was. And I might add as well that -- and this</b></p> <p>5 <b>is important to note -- I did put a call in to the</b></p> <p>6 <b>police before.</b></p> <p>7 Q. You did put a call --</p> <p>8 <b>A. I put a call in to the Scotland Yard Press Bureau on the</b></p> <p>9 <b>eve of publication of the first article, and no</b></p> <p>10 <b>objection was, from memory, no one actually came on the</b></p> <p>11 <b>phone to me and said, "Please don't run this".</b></p> <p>12 LORD JUSTICE LEVESON: Sorry?</p> <p>13 <b>A. When I put in a call before we published, sir, we --</b></p> <p>14 <b>I wrote -- I rang Scotland Yard press office to ask some</b></p> <p>15 <b>questions about this proposed story.</b></p> <p>16 LORD JUSTICE LEVESON: Yes?</p> <p>17 <b>A. Yes.</b></p> <p>18 LORD JUSTICE LEVESON: That's slightly different.</p> <p>19 <b>A. No, I --</b></p> <p>20 LORD JUSTICE LEVESON: Did Mr Driscoll's evidence,</p> <p>21 therefore, come to you as a shock, about the impact that</p> <p>22 the story has had on his investigation?</p> <p>23 <b>A. Well, I -- slightly, yes. I have enormous respect for</b></p> <p>24 <b>Mr Driscoll as well. There is shock in the sense that</b></p> <p>25 <b>I would disagree personally that that article would</b></p> <p style="text-align: center;">Page 6</p>	<p>1 LORD JUSTICE LEVESON: I've no doubt that --</p> <p>2 <b>A. Yes.</b></p> <p>3 LORD JUSTICE LEVESON: -- the Lawrences have a very, very</p> <p>4 great regard for your paper, which has taken an</p> <p>5 enormously important lead in connection to the death of</p> <p>6 their son, murder of their son.</p> <p>7 <b>A. Yes.</b></p> <p>8 LORD JUSTICE LEVESON: But do you doubt Mr Driscoll's</p> <p>9 evidence that the carefully rebuilt relationship was at</p> <p>10 risk of fracturing because of their fear that actually</p> <p>11 this was all going to leak out again?</p> <p>12 <b>A. Right, I can understand why Mr Driscoll said that, and</b></p> <p>13 <b>obviously he's better placed to comment on their initial</b></p> <p>14 <b>reaction when that story broke. These -- these stories,</b></p> <p>15 <b>these big ones, it is a judgment issue from a newspaper</b></p> <p>16 <b>perspective as to when you write them. I would argue,</b></p> <p>17 <b>I would say in my experience these iconic cases, the</b></p> <p>18 <b>Lawrence ones and the like, when there are developments</b></p> <p>19 <b>in them, can be very difficult for the police to control</b></p> <p>20 <b>the flow of information. It doesn't always come to the</b></p> <p>21 <b>Mail, I say, but sir that is the reality of the</b></p> <p>22 <b>situation, and we would not have run that story had the</b></p> <p>23 <b>police objected, and nor would we have run the story if</b></p> <p>24 <b>we thought it was going to jeopardise the investigation</b></p> <p>25 <b>in any way.</b></p> <p style="text-align: center;">Page 8</p>

<p>1 LORD JUSTICE LEVESON: Actually, that's what caused me to 2 interrupt Mr Jay. Asking questions about the proposed 3 story is one thing, but did you explain to the press 4 office precisely what you had and what you were going to 5 run, so they could make informed representations to you 6 about the risk that ran? 7 <b>A. Right, I cannot recall.</b> 8 LORD JUSTICE LEVESON: I mean, if you've done that and 9 they've said, "Get on with it", that's one thing. 10 <b>A. Yes, yes.</b> 11 LORD JUSTICE LEVESON: Then the criticism goes back -- if 12 there is criticism, it goes back to the Met and their 13 internal handling proceedings. 14 <b>A. Yes, yes.</b> 15 LORD JUSTICE LEVESON: But if you didn't, it does raise 16 a question, and it's a very, very finely balanced 17 issue -- 18 <b>A. It is.</b> 19 LORD JUSTICE LEVESON: -- which is very different from the 20 sort of black and white stuff that I've been hearing 21 about. 22 <b>A. Yes.</b> 23 LORD JUSTICE LEVESON: But it's no less important. 24 <b>A. And I think perhaps there's some further evidence which</b> 25 <b>will emerge which shows the next stage in this story,</b></p> <p style="text-align: center;">Page 9</p>	<p>1 <b>should run is that we'd already named five men as the</b> 2 <b>murderers. To the best of my knowledge, they were</b> 3 <b>already in south London, and in my opinion, my judgment,</b> 4 <b>it was unlikely a story saying that there had been a DNA</b> 5 <b>breakthrough in the case, or whatever I wrote at the</b> 6 <b>time, fibre breakthrough, that they were likely to go on</b> 7 <b>the run. They had been living with the shadow of being</b> 8 <b>suspects for a long time, and that's an important</b> 9 <b>consideration for us.</b> 10 LORD JUSTICE LEVESON: I understand. 11 <b>A. Mm.</b> 12 LORD JUSTICE LEVESON: But the issue that I was trying to 13 raise is whether you really could say that you've taken 14 into account the informed views of the investigating 15 officer. 16 <b>A. Yes.</b> 17 LORD JUSTICE LEVESON: Because Mr Driscoll, he was talking 18 with feeling. This is a professional police officer. 19 <b>A. Yes.</b> 20 LORD JUSTICE LEVESON: And he clearly felt very strongly. 21 <b>A. Yes.</b> 22 LORD JUSTICE LEVESON: You'll reach your own view about it, 23 but he certainly seemed to me to feel very strongly -- 24 <b>A. Yes.</b> 25 LORD JUSTICE LEVESON: -- that actually this had caused real</p> <p style="text-align: center;">Page 11</p>
<p>1 <b>where we did actually hold back on something on the</b> 2 <b>Lawrence case.</b> 3 LORD JUSTICE LEVESON: Yes, I know. But we can only take it 4 a step at a time. 5 <b>A. Yes, of course, I just wanted to --</b> 6 LORD JUSTICE LEVESON: You have to follow my rather -- 7 <b>A. I'm not going to get out of sequence here but that's</b> 8 <b>what -- I mean for us as journalists and newspapers</b> 9 <b>these are finely balanced decisions. My way of dealing</b> 10 <b>with it isn't affected solely by the possibility that if</b> 11 <b>we hold off, someone else might do it. That is not</b> 12 <b>the -- a lot of things are considered, in case people</b> 13 <b>are thinking, oh, they are going to ignore a request not</b> 14 <b>to hold a story because they fear being scooped.</b> 15 LORD JUSTICE LEVESON: But you can't remember whether you 16 actually put it to the press -- 17 <b>A. Yes, I did, but I want -- I did put it to them in the</b> 18 <b>evening, late in the evening, a decision was taken quite</b> 19 <b>late at night, quite late, to run the story, but I did</b> 20 <b>ring the press office before, but I --</b> 21 LORD JUSTICE LEVESON: And told them precisely what the -- 22 <b>A. Yes, I was, yes.</b> 23 LORD JUSTICE LEVESON: The real question is -- 24 <b>A. I'd say my experience, my experience, my -- part of my</b> 25 <b>reasoning behind thinking this story is one which we</b></p> <p style="text-align: center;">Page 10</p>	<p>1 problems. 2 <b>A. Yes.</b> 3 LORD JUSTICE LEVESON: And he was the very first to say you 4 were a driving force in the inquiry, so he wasn't trying 5 to get at you -- 6 <b>A. No.</b> 7 LORD JUSTICE LEVESON: -- at all. He had the highest regard 8 for you. 9 <b>A. Yes.</b> 10 LORD JUSTICE LEVESON: But he raised an issue which it seems 11 to me is at the very core of where -- 12 <b>A. Yes.</b> 13 LORD JUSTICE LEVESON: -- we should be thinking about -- 14 <b>A. Absolutely, and --</b> 15 LORD JUSTICE LEVESON: -- what should happen. 16 <b>A. At the risk of going out of sequence, I might be able to</b> 17 <b>say shortly that we did it a different way the next</b> 18 <b>time.</b> 19 LORD JUSTICE LEVESON: All right, well, we've done it. 20 <b>A. I don't know -- you know what I am saying.</b> 21 LORD JUSTICE LEVESON: I understand, but -- 22 <b>A. Yes, you're right to, to raise that point, obviously,</b> 23 <b>and I --</b> 24 LORD JUSTICE LEVESON: It's not obvious that I'm right to. 25 <b>A. No.</b></p> <p style="text-align: center;">Page 12</p>

<p>1 LORD JUSTICE LEVESON: People are perfectly happy to 2 disagree with me and frequently do. 3 <b>A. I will do, but not on this occasion, sir.</b> 4 MR JAY: On the second occasion, which was in September 5 2010, you informed the MPS press office that you were 6 proposing to publish a story. The press office had 7 sufficient information from what you told them to enable 8 them to speak to Mr Driscoll, and the message came back 9 to you with a request not to publish, do I have that 10 right? 11 <b>A. Yes. I'd like to correct that slightly. Actually</b> 12 <b>I contacted the press office to say that I was aware</b> 13 <b>that there may be developments in the case. I put</b> 14 <b>a question to them about the possibility of charges that</b> 15 <b>week, and I had no idea that the DPP had been in court</b> 16 <b>seeking some sort of legal order or anything like that,</b> 17 <b>that was not something I was aware of specifically, and</b> 18 <b>I wasn't saying we are going to run a story, I said</b> 19 <b>I want to let you know about -- that we are -- wanted to</b> 20 <b>find out if it was true, firstly, and then I said I'm</b> 21 <b>fully aware of how sensitive this case is and the last</b> 22 <b>thing I want to do is to do anything which would</b> 23 <b>jeopardise the investigation. So it doesn't matter</b> 24 <b>whether I'm -- you know, that another paper runs it</b> 25 <b>tomorrow, if you wish to make representations to me to</b></p> <p style="text-align: center;">Page 13</p>	<p>1 you're acting in a way which is -- well, I won't say 2 unethical, because that's putting it too high, but you 3 are acting on the basis of stories which are leaked to 4 you and which you know are unauthorised. 5 <b>A. Well, I don't know, I disagree there. My job didn't</b> 6 <b>involve writing about leaks every day.</b> 7 Q. No. 8 <b>A. No. So -- and I'm led to believe that -- I'd like to</b> 9 <b>think I've enjoyed a good, professional relationship</b> 10 <b>with a lot of police officers, some very senior, and</b> 11 <b>no one's ever accused -- no one's ever said to me, "I'm</b> 12 <b>not talking to you because you received leaked</b> 13 <b>information".</b> 14 Q. That was the next question I had. 15 <b>A. Sorry.</b> 16 Q. No, not at all. So it hasn't actually been an issue in 17 informal discussions you've had with police officers. 18 They don't point the metaphorical finger at you and say 19 "We're not going to trust you in the future because we 20 know that you've been acting on the basis of 21 unauthorised disclosures". That hasn't been an issue? 22 <b>A. I think some people believe I was well informed.</b> 23 LORD JUSTICE LEVESON: Yes, well they probably are grown up 24 enough to say that you're trying to get as much 25 information as you can. It's up to them to make sure</p> <p style="text-align: center;">Page 15</p>
<p>1 <b>say we shouldn't run this, then I will advise the editor</b> 2 <b>accordingly, and that is what I did.</b> 3 Q. The heart of the issue in relation to the earlier story, 4 the November 2007 story, is that people would think that 5 there had been a police leak, do you follow me, and that 6 you were publishing on the back of that leak, and that 7 would cause harm not necessarily to any future criminal 8 trial, but to the ongoing delicate relationship between 9 the police and the Lawrence family. Is that a factor 10 you think you took into account when advising the editor 11 as to whether or not to publish that story in November 12 2007? 13 <b>A. (Pause). I cannot -- I cannot recall -- I cannot recall</b> 14 <b>that, Mr Jay.</b> 15 Q. Okay. May I just test with you this issue of trust, 16 which obviously is very important, your credibility with 17 the police, and you've obviously maintained that trust. 18 But is there not a danger as well, looking at the long 19 game, as it were, that if the police think that you are 20 acting, as journalists are entitled to do, on the basis 21 of stories which have been leaked to journalists, that 22 might diminish the trust that the police might hold for 23 that journalist? 24 <b>A. Sorry, might diminish the?</b> 25 Q. The trust the police hold for that journalist, because</p> <p style="text-align: center;">Page 14</p>	<p>1 you don't get what they don't want you to have. 2 <b>A. Just because I'm giving information doesn't mean to say</b> 3 <b>I'm necessarily going to write it, and that's the point</b> 4 <b>I would make.</b> 5 LORD JUSTICE LEVESON: Yes. 6 MR JAY: Yes. 7 LORD JUSTICE LEVESON: But the megaphone has changed. It's 8 no longer in the hands of the police, it's now in your 9 hands for you to decide what you want to do. 10 <b>A. I would never write a story -- the trust -- Mr Jay said</b> 11 <b>the trust issue is very important. I would never write</b> 12 <b>a story based on someone telling me something and me not</b> 13 <b>checking, "Are you happy for me to write this or not?"</b> 14 LORD JUSTICE LEVESON: Okay. 15 <b>A. So with reference to the Filkin report, there's no</b> 16 <b>trickery involved in my crime reporting at all. No</b> 17 <b>trickery. If people want to tell me something, or</b> 18 <b>wanted to -- it's a matter for them, then we make</b> 19 <b>a judgment on whether it's right to run the story or</b> 20 <b>not.</b> 21 MR JAY: The person who's providing you with the 22 information, who may well be acting in an unauthorised 23 fashion -- of course I'm not saying that this is the 24 norm, I was indicating it probably only happens 25 exceptionally -- that person may well be entirely</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

1 satisfied that you write the story, because that's why  
 2 you're being provided with the information; would you  
 3 agree?  
 4 **A. I'd like to think that, you know, quite a few police**  
 5 **officers respect the role of journalists, and what we**  
 6 **do. I say, to repeat myself, my -- this was a --**  
 7 **I covered the Lawrence case since 1997. There were**  
 8 **a lot of exclusive stories I broke early in that**  
 9 **campaign. No one complained then. And obviously some**  
 10 **people might regard it as being a force for good, those**  
 11 **stories, and they were unauthorised but they were for**  
 12 **good, so I think it was well-known by a lot of people**  
 13 **that I had a close interest in that case.**  
 14 Q. When you have been provided with unauthorised  
 15 information over the years, have you on occasion doubted  
 16 the motives of those who have been providing you with  
 17 such information?  
 18 **A. Yes.**  
 19 Q. And if you do doubt their motives, is that a factor,  
 20 whether or not you publish a story on the back of the --  
 21  
 22 **A. Yes.**  
 23 Q. -- information they provide to you?  
 24 **A. There was an occasion in 2005 when I learned that the**  
 25 **Chief Constable of Cambridgeshire had been acting in an**

Page 17

1 **inappropriate way with a woman at a conference, and**  
 2 **I was concerned that this information had come to me**  
 3 **for -- well, I was concerned how that -- I was concerned**  
 4 **that there might be some ulterior motives and**  
 5 **I considered the information for a couple of days,**  
 6 **I thought very carefully about running that story**  
 7 **because of the implications for that man's future**  
 8 **career. As it happened, I did run the story, having**  
 9 **thought very carefully about it, and he resigned the**  
 10 **next day. I might add as well that individual is a man**  
 11 **of integrity and he's never held it against me. He**  
 12 **actually called me some time later, he recognised it was**  
 13 **a story in the public interest.**  
 14 Q. You deal with some other stories you've written over the  
 15 years, paragraph 19, for example. You deal with the  
 16 Commander Ali Dizaei stories and a string of exposes.  
 17 Those exposes, without looking at them one by one, as it  
 18 were, your sources there on occasion unofficial,  
 19 unauthorised or does it vary?  
 20 **A. I guess it would vary. It would vary. I mean that**  
 21 **particular officer, who's just again been convicted of**  
 22 **corruption, very difficult individual to deal with, not**  
 23 **only for journalists but for police forces, police**  
 24 **authorities, anyone who challenges his view on the**  
 25 **world. And I had to move very delicately to gather**

Page 18

1 **information on that case. An extremely litigious man,**  
 2 **extremely litigious. And we -- as far as I'm concerned,**  
 3 **the Daily Mail -- what we did in not being -- in**  
 4 **challenging that man and revealing details about what he**  
 5 **was up to was hugely in the public interest, as was**  
 6 **our -- my revelations, my colleague revelations about**  
 7 **the cowardice at Scotland Yard, the senior officers who**  
 8 **were scared of him, they were scared of him, they were**  
 9 **scared of him.**  
 10 Q. May I move now to the issue of hospitality. Could we  
 11 see if we can deal with this broadly before looking at  
 12 the detail? Do you think that part of the reason for  
 13 developing semiprofessional -- they're always  
 14 professional, let me correct that -- professional  
 15 relationships over lunch and over dinner is to foster  
 16 the degree of trust which you identify as being  
 17 essential?  
 18 **A. I think it's part of it. I don't -- I'm happy to meet**  
 19 **a police officer for a cup of coffee, breakfast, lunch,**  
 20 **dinner, drink, or in his office, doesn't matter to me.**  
 21 **I think my own personal view has been an overemphasis on**  
 22 **hospitality because for me it's just a small part of the**  
 23 **way in which you operate as a journalist.**  
 24 Q. Apart from to win the confidences of the officers you  
 25 were meeting on these occasions, was it in any way in

Page 19

1 order to gain access to more of the information we've  
 2 just been talking about, namely unauthorised  
 3 information? (Pause).  
 4 **A. Um ... well, I'll just put it this way. It's -- you**  
 5 **know, if a police officer wishes to join you as**  
 6 **a reporter for a coffee, a tea, lunch, whatever, it can**  
 7 **be part of that trust-building process, but I just want**  
 8 **to reiterate it's not exclusively -- that's not the**  
 9 **exclusive way in which trust is gained. So I've had**  
 10 **many social occasions with police officers when it has**  
 11 **been perfectly pleasant and if I was a reporter**  
 12 **desperate for a story, I would have been very**  
 13 **disappointed; actually that is not how it works. You do**  
 14 **not go along to a meeting with a police officer**  
 15 **expecting to get a story. If you show that, then it**  
 16 **comes across very quickly. For me it's about gaining**  
 17 **knowledge and context.**  
 18 Q. I'm sure you're right about that, Mr Wright, but it's  
 19 a far more subtle process. You don't go out to lunch or  
 20 dinner at a restaurant, whether it's a nice restaurant  
 21 or not, expecting on that occasion for the officer to  
 22 share a piece of unauthorised information with you?  
 23 **A. No.**  
 24 Q. What I am suggesting, though, is you might be doing that  
 25 as part of a trust-building process, to use your

Page 20

<p>1 terminology --</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. -- which would yield in due course to that officer maybe</p> <p>4 giving you a ring on your mobile phone.</p> <p>5 <b>A. Well it may --</b></p> <p>6 Q. Is that correct?</p> <p>7 <b>A. It may or may not, Mr Jay, and I would not -- there are</b></p> <p>8 <b>some police officers who I'm very, you know, aware are</b></p> <p>9 <b>not -- everyone's different, and there are some people</b></p> <p>10 <b>who I might meet for a lunch or dinner, or have done in</b></p> <p>11 <b>the past, where it's more a question of them trying to</b></p> <p>12 <b>find out what I'm up to.</b></p> <p>13 Q. Yes.</p> <p>14 <b>A. I've been very conscious of that over the years.</b></p> <p>15 Q. I understand that, Mr Wright, human nature being as it</p> <p>16 is. Sometimes it's the officer who wants more out of</p> <p>17 you than he's ever going to give to you. Sometimes it's</p> <p>18 an entirely neutral process, where you just wish to get</p> <p>19 to know each other better.</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. But on other occasions it may be that you are hoping in</p> <p>22 due course that the officer may provide you with</p> <p>23 unauthorised information. Have I correctly understood</p> <p>24 it?</p> <p>25 <b>A. I'm a journalist wanting to find out -- my job is to</b></p> <p style="text-align: center;">Page 21</p>	<p>1 I'm certainly not going to go through all the items,</p> <p>2 when Lord Stevens was Commissioner --</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. -- 2000 to 2005, it appears that Mr Dacre must have had</p> <p>5 a reasonably good relationship with him --</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. -- because there were quite frequent meetings. Very</p> <p>8 often, actually, at Associated's offices, not in</p> <p>9 a restaurant.</p> <p>10 <b>A. To the best of my knowledge, Sir John -- we never met</b></p> <p>11 <b>Sir John in a restaurant. It was either at</b></p> <p>12 <b>Scotland Yard or at the Daily Mail building.</b></p> <p>13 Q. Yes. When we move on to Sir Ian Blair, there are only</p> <p>14 about two or three relevant entries. There's lunch, it</p> <p>15 may be the same occasion, 10 and 11 October, maybe one</p> <p>16 of them was cancelled. Lunch in October 2005, a chat in</p> <p>17 June 2005 and drinks in December 2005.</p> <p>18 <b>A. I don't remember that.</b></p> <p>19 Q. The detail isn't going to matter, but the Daily Mail's</p> <p>20 relationship with Sir Ian Blair was not quite as warm,</p> <p>21 perhaps, as its relationship was, and vice versa, with</p> <p>22 Sir John Stevens?</p> <p>23 <b>A. I think that Sir John Stevens, as this Inquiry has heard</b></p> <p>24 <b>already, dealt with a number of newspapers which</b></p> <p>25 <b>I imagine he perceived to be important newspapers. From</b></p> <p style="text-align: center;">Page 23</p>
<p>1 <b>find out -- to find out what's going on. I say I do</b></p> <p>2 <b>not -- whenever I've had lunch or dinner with someone,</b></p> <p>3 <b>there's no strings attached. I fully respect that. If</b></p> <p>4 <b>they don't want to talk in an unauthorised way.</b></p> <p>5 Q. Of course. Of course, but do you think that there's any</p> <p>6 sort of relationship in causal terms between the quality</p> <p>7 of the restaurant and the likelihood of you in due</p> <p>8 course receiving unauthorised information?</p> <p>9 <b>A. Not at all.</b></p> <p>10 Q. You say that with complete confidence?</p> <p>11 <b>A. Absolutely. It would be completely inappropriate to</b></p> <p>12 <b>lavish hospitality on a junior officer -- any officer,</b></p> <p>13 <b>frankly. I don't think that is the issue at all,</b></p> <p>14 <b>certainly not the way I operate, it would be completely</b></p> <p>15 <b>inappropriate.</b></p> <p>16 Q. You're never lavishing hospitality on junior officers.</p> <p>17 They are always --</p> <p>18 <b>A. No, and seniors. I say junior, what I -- any officer,</b></p> <p>19 <b>frankly, any officer. What I was going to say was if</b></p> <p>20 <b>you were meeting a junior officer, you know, you</b></p> <p>21 <b>wouldn't take him to an expensive restaurant, and quite</b></p> <p>22 <b>possibly if you're going to take out a senior officer,</b></p> <p>23 <b>you wouldn't go to the transport caff around the corner,</b></p> <p>24 <b>unless that individual particularly insists on that.</b></p> <p>25 Q. Standing back from what the hospitality records say, and</p> <p style="text-align: center;">Page 22</p>	<p>1 <b>memory -- I don't have the benefit of your document</b></p> <p>2 <b>there -- I think we had a lunch with myself, the editor,</b></p> <p>3 <b>key commentators in the paper, with him, probably every</b></p> <p>4 <b>eight or nine months, maybe even every year, once</b></p> <p>5 <b>a year, but I think he used the phrase the other day</b></p> <p>6 <b>that he was grilled. He was grilled.</b></p> <p>7 Q. In most years, though, but usually only once a year, you</p> <p>8 had a one-to-one lunch with Mr Fedorcio.</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. What was the purpose of those lunches?</p> <p>11 <b>A. I -- Mr Fedorcio, obviously head of press. For me it</b></p> <p>12 <b>was about listening -- well, once a year is useful to</b></p> <p>13 <b>catch up with the head of press at Scotland Yard.</b></p> <p>14 <b>I also tried occasionally to talk to his number two or</b></p> <p>15 <b>his number three as well.</b></p> <p>16 <b>The Daily Mail was perceived to be, on some</b></p> <p>17 <b>occasions, harsh about the Metropolitan Police, even</b></p> <p>18 <b>before Sir Ian Blair took over, and part of my role</b></p> <p>19 <b>would be to listen to those concerns and feed them back</b></p> <p>20 <b>to the office about how we were dealing with things.</b></p> <p>21 Q. Did you have any discussions with Mr Fedorcio about the</p> <p>22 Lawrence case?</p> <p>23 <b>A. When, Mr Jay?</b></p> <p>24 Q. Well, first of all the general question.</p> <p>25 <b>A. Oh yes, I had -- I mean, I've had -- I mean, I apologise</b></p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

1 to all the press officers I have called over the years  
 2 about the Lawrence case because I've been following it  
 3 relentlessly. Mr -- Mr Fedorcio would have been asked  
 4 about that, but he never spoke about it. I do not  
 5 believe he had any knowledge about what was going on.  
 6 Q. So when you had lunch with Mr Fedorcio at a restaurant  
 7 called Tapsters, I think it is, on 6 November 2007, the  
 8 articles we're talking about were written either -- we  
 9 know one was written on 8 November 2007 and you mention  
 10 one the previous day?  
 11 A. Yes.  
 12 Q. That's a pure coincidence, is it?  
 13 A. That is a pure coincidence. That is a pure coincidence.  
 14 I do not believe -- well, I can't remember what was  
 15 spoken about that day, but I want to avoid any doubt,  
 16 I am as certain as can be that not only -- well, he  
 17 wasn't involved in telling me anything, and I, to the  
 18 best of my knowledge, think we didn't even discuss it.  
 19 Q. Was he ever the source of unauthorised disclosures or  
 20 information provided to you?  
 21 A. Not to me, no.  
 22 Q. Not to you, but to others, that suggests?  
 23 A. I couldn't comment, I don't know. It wouldn't be for me  
 24 to say.  
 25 Q. You couldn't comment, okay. Because the Mail was taking  
 Page 25

1 a consistent line in relation to Sir Ian Blair. The  
 2 first piece you wrote which he actually mentions in his  
 3 book, 14 October 2004, it wasn't particularly hostile,  
 4 but I think he felt it was. The articles over the years  
 5 you're, quite entitled to write in this way, there's no  
 6 criticism, were less friendly of Sir Ian Blair than they  
 7 were, perhaps, of the previous Commissioner; is that  
 8 correct?  
 9 A. Well, they were, but there was an explanation for that,  
 10 obviously. When Sir Ian was appointed Commissioner in  
 11 I think it was November 2004, I was very keen to foster  
 12 a good relationship with him -- not a good relationship,  
 13 but a working relationship. There were concerns on both  
 14 sides, I'll be honest, and we met for a private lunch,  
 15 there was no press officer there. Obviously what was  
 16 discussed that day was confidential but it was just me  
 17 saying that I will be, you know, fair and -- fair in our  
 18 reporting, and I want to be -- to build, you know,  
 19 a good, professional relationship with you.  
 20 Unfortunately, after the 7/7 attacks, Sir Ian's  
 21 career started to be affected by a series of stories  
 22 about himself. So I think if you're coming up -- not to  
 23 pre-empt what you're going to say, but unfortunately the  
 24 sad reality is that Sir Ian was the architect of his own  
 25 downfall because of the controversies which he  
 Page 26

1 attracted. It wasn't a factor -- it wasn't a factor of  
 2 the Daily Mail having an agenda against him. As police  
 3 officers followed the evidence, we as journalists  
 4 followed the story, and Ian Blair made himself the  
 5 story.  
 6 Q. We know that people were briefing against Sir Ian Blair  
 7 over the years, but in particular from about 2006. Were  
 8 you the recipient of any such briefings?  
 9 A. I was gathering -- I wasn't -- I was -- sorry, in 2006?  
 10 Q. Starting -- well, it started when he started as  
 11 Commissioner, which I think was January or February  
 12 2005, but things --  
 13 A. I think -- I think there is the -- 2005 there was the  
 14 terror attacks. I think initially Sir Ian dealt well  
 15 with those, and then there was the issue of the  
 16 Stockwell case and all the controversy around that.  
 17 In 2006, Sir Ian made some unpleasant remarks about  
 18 the Soham case. Then it emerged that he had bugged the  
 19 Attorney General and the head of the police watchdog.  
 20 Then there was the issue later of his appeasement and  
 21 promotion of Dizaei. There are a whole host of  
 22 controversies which made Sir Ian be in the spotlight and  
 23 I'd have not been doing my job properly if I'd ignored  
 24 those. So I wasn't -- there was no need for anyone, in  
 25 my opinion, to brief against Sir Ian. The stories which  
 Page 27

1 engulfed him were very much in the public domain and had  
 2 to be reported on.  
 3 Q. So is this your evidence, that people did -- insofar as  
 4 you were aware, did not brief against him and you did  
 5 not receive the results of such briefings?  
 6 A. Well, there were --  
 7 Q. Maybe I can put it more specifically, that within the  
 8 management board --  
 9 A. Yes.  
 10 Q. -- there were a couple of people in particular who were  
 11 briefing against him.  
 12 A. Oh, I see.  
 13 Q. Were those people speaking to you?  
 14 A. Can I put it this way, that there was a civil war at the  
 15 Yard and I'm at that particular time the top level, and  
 16 it was my job to report on that. I'd be failing my duty  
 17 if I didn't. And, you know, that -- in 2008, Assistant  
 18 Commissioner Ghaffur issued race discrimination  
 19 proceedings against Sir Ian and that was another sign of  
 20 the disharmony at the top of the organisation.  
 21 Q. Let's assume all that is true, Mr Wright. Civil war in  
 22 the Met, in the public interest to write stories about  
 23 it. I think my question was more: what was the source  
 24 of your stories aside from matters which entered the  
 25 public domain? Were people on the management board  
 Page 28

<p>1 speaking to you so that you could write stories?  2 I think the answer is either "yes" or "no". (Pause).  3 <b>A. I was aware -- I'm trying to think of -- can I put it</b>  4 <b>this way? I've got to be conscious of my journalistic</b>  5 <b>obligations here.</b>  6 Q. Mm.  7 <b>A. I was fully aware of the camps and I had information.</b>  8 Q. Well, it's possible to draw inferences from that answer,  9 but I'm ...  10 <b>A. Well, the management board is so small, Mr Jay. It's</b>  11 <b>not like asking --</b>  12 Q. I'm not asking you to identify who it was.  13 <b>A. No, but I think, you know, you should be aware that the</b>  14 <b>race claim brought by Mr Ghaffur was a very significant</b>  15 <b>moment that year, symbolic of the divisions in the Met.</b>  16 <b>It didn't just -- it wasn't just about any briefing and</b>  17 <b>counter briefing within the management board.</b>  18 Q. Were you particularly close to AC Hayman and AC Yates?  19 <b>A. No, I wouldn't say so.</b>  20 Q. Were you often to be found in this wine bar -- there may  21 be more than one wine bar, though -- that we've heard  22 evidence about near Scotland Yard?  23 <b>A. I wouldn't say I was often there, no. Often in any wine</b>  24 <b>bar, frankly. If you're seen in a wine bar near</b>  25 <b>Scotland Yard frequently, it doesn't send a good message</b></p> <p style="text-align: center;">Page 29</p>	<p>1 <b>A. Yes, yes, yes.</b>  2 Q. The piece itself referred to a "police insider"?  3 <b>A. Yes.</b>  4 Q. Can I ask you this: was there a police insider or was  5 the story derived from other material?  6 <b>A. There was a generic term "police sources", Mr Jay.</b>  7 <b>Obviously I was -- I was misinformed. No excuses from</b>  8 <b>my perspective. Very disappointed from a professional</b>  9 <b>point of view that we got it wrong, and it was right</b>  10 <b>that we put it right.</b>  11 Q. So without going into this in full detail, this is  12 another example of an unauthorised provision of  13 information to you?  14 <b>A. Yes.</b>  15 Q. Did you on that occasion check the story out with the  16 press office?  17 <b>A. I did -- I did call the Scotland Yard press office and</b>  18 <b>put a general question in. Unfortunately, they declined</b>  19 <b>to comment, and it was left to my judgment whether to</b>  20 <b>run it or not, and unfortunately I made the wrong call.</b>  21 Q. We've heard evidence from Mr Quick, as you're aware.  22 <b>A. Yes.</b>  23 Q. The evidence he gave largely, not exclusively, but I may  24 be wrong about this, related to the Mail on Sunday and  25 not to the Daily Mail.</p> <p style="text-align: center;">Page 31</p>
<p>1 <b>about your way of operating let alone your lifestyle.</b>  2 Q. Okay. Finally on this point, Mr Wright, aside from the  3 Commissioner Mr Fedorcio and Deputy Commissioner, when  4 you refer to senior officers at the Met in paragraph 23  5 of your statement, we're looking, I suppose, at  6 assistant commissioners and deputy assistant  7 commissioners, are there any who bought you lunch,  8 drinks or dinner on more than a handful of occasions?  9 <b>A. Absolutely not. I have always been very keen not to --</b>  10 <b>something I was going to raise with the Chairman</b>  11 <b>later -- the intensity of meetings with people and any</b>  12 <b>hospitality has to be closely monitored. I've been very</b>  13 <b>aware of that over the years, so not meeting people too</b>  14 <b>often.</b>  15 Q. And this is a point, no doubt, you'd wish to come to at  16 the end of your evidence when we're discussing as it  17 were the future possible recommendations.  18 <b>A. Yes, of course. Yes.</b>  19 Q. Can I ask you, please, a number of assorted questions.  20 We've received some evidence in relation to the  21 Mr Subramanyam story, who was the Tamil hunger striker,  22 which resulted in libel proceedings which were  23 successful from the claimant's perspective, and you,  24 I think, were responsible for the defamatory piece; is  25 that correct?</p> <p style="text-align: center;">Page 30</p>	<p>1 <b>A. Yes, yes.</b>  2 Q. Obviously you've had nothing to do with the Mail on  3 Sunday stories.  4 <b>A. Yes.</b>  5 Q. But have you written any stories about him --  6 <b>A. About Mr Quick?</b>  7 Q. Yes.  8 <b>A. I think I may have written some articles in relation to</b>  9 <b>the arrest of Damian Green, but with that particular</b>  10 <b>story, the arrest of Damian Green, my role was very</b>  11 <b>secondary in the story. My colleagues in the lobby or</b>  12 <b>the home affairs were dealing that so mine was really</b>  13 <b>a small role.</b>  14 Q. Do you think that there was an agenda in relation to the  15 Damian Green issue? He was a Conservative Member of  16 Parliament. The Daily Mail tends to support the  17 Conservative Party, and therefore part of the motivation  18 to go for the Metropolitan Police in relation to the  19 Green arrest, et cetera, was political?  20 <b>A. No, I wouldn't accept that, although I wasn't involved</b>  21 <b>in the decision-making around stories, because obviously</b>  22 <b>I'm not the editor, but I wouldn't accept that --</b>  23 <b>I think it was -- there was clearly -- the stories speak</b>  24 <b>for themselves. Across a lot of papers, there was a lot</b>  25 <b>of briefing going on which appeared to come from</b></p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)



<p>1 <b>political sources, there was, but it's us -- it's our</b>                  2 <b>role at the newspaper to decide which way we want to</b>                  3 <b>report it, so I don't -- there's no -- no agenda against</b>                  4 <b>Mr Quick, that's for sure.</b>                  5 Q. The Daily Mail is entitled to take whatever political                  6 position it chooses.                  7 <b>A. Absolutely, yes.</b>                  8 Q. No one is questioning that, but had Mr Green been                  9 a Labour MP, do you think the story would have been the                  10 same?                  11 <b>A. I can't speculate on that.</b>                  12 Q. Okay. Can I move on to some more general questions,                  13 then, Mr Wright? You say in paragraph 31 of your                  14 statement, our page 07735 --                  15 <b>A. Sorry, which paragraph?</b>                  16 Q. Paragraph 31, "Proposals for reform".                  17 <b>A. Oh right.</b>                  18 Q. Towards the end of that paragraph:                  19 "I believe that, in the current climate,                  20 clarification and new guidance on police/media relations                  21 is inevitable and must be respected ..."                  22 <b>A. Yes.</b>                  23 Q. What are you driving at there?                  24 <b>A. I didn't want to come to this Inquiry today being</b>                  25 <b>perceived as someone who's in denial, that everything's</b>                  Page 33</p>	<p>1 written record of them.                  2 <b>A. Yes.</b>                  3 Q. Not necessarily the gist of what was said, but the mere                  4 fact of their occurrence. Do you see a difficulty with                  5 that?                  6 <b>A. Yes, I do. I think I see a bureaucratic problem with</b>                  7 <b>that, which is the police have enough bureaucracy as it</b>                  8 <b>is. I fear that people who do act in the public</b>                  9 <b>interest -- and many of the people I've dealt with have</b>                  10 <b>over the years, they do act in the public interest</b>                  11 <b>talking to me -- will be persecuted for doing that, even</b>                  12 <b>if there's no record of actually what was said. That is</b>                  13 <b>my concern. These types of rules could be abused by</b>                  14 <b>senior officers looking to look after their own careers.</b>                  15 <b>Controlling information flow. There has to be some sort</b>                  16 <b>of balance, in my opinion, some sort of balance, some</b>                  17 <b>sort of safeguard put in, because if every contact with</b>                  18 <b>the media is examined to the nth degree and people are</b>                  19 <b>scared of dealing with the media, it could lead to</b>                  20 <b>a corruption of a different type.</b>                  21 LORD JUSTICE LEVESON: The same could be said the other way                  22 round. If it's a complete free-for-all, then that might                  23 undermine the public interest --                  24 <b>A. Yes, yes.</b>                  25 LORD JUSTICE LEVESON: -- because of what goes in the                  Page 35</p>
<p>1 <b>been okay, that things can't change. That would be</b>                  2 <b>wrong. That's what I'm saying. I believe that the main</b>                  3 <b>issues around hospitality, which you've been considering</b>                  4 <b>in this Inquiry, it's about the closeness and the</b>                  5 <b>intensity of that hospitality. I think that's a key</b>                  6 <b>issue for me, something I've been mindful about anyway</b>                  7 <b>but it's something which needs to be formalised.</b>                  8 <b>I'm very concerned about moves to ban all informal</b>                  9 <b>contact. I think that's wrong. That's not going to</b>                  10 <b>serve the public interest. And I am concerned that if</b>                  11 <b>draconian rules are brought in banning informal contact</b>                  12 <b>between the police and the media, then genuinely that</b>                  13 <b>the police will not necessarily be better for it, and</b>                  14 <b>the public will be worse for it as well.</b>                  15 Q. Do you --                  16 <b>A. There are stories I've done in my career and there will</b>                  17 <b>be stories which other papers have done exposing things</b>                  18 <b>in the police which will not be volunteered out. You</b>                  19 <b>have to find it, you have to go and dig, you have to</b>                  20 <b>deal with people on a confidential basis, but if the</b>                  21 <b>laws or the rules are such that that is completely</b>                  22 <b>banned, then we have no chance.</b>                  23 Q. But suppose the proposition was not we're going to ban                  24 these interactions but instead we're going to require                  25 that they be recorded in the sense that there is some                  Page 34</p>	<p>1 newspapers. They have to find the right balance.                  2 <b>A. Absolutely, that's what I said. The right balance has</b>                  3 <b>to be achieved and that's -- you know, I've been</b>                  4 <b>thinking about that these last couple of weeks.</b>                  5 LORD JUSTICE LEVESON: And?                  6 <b>A. I haven't come to a decision. I can't -- your Honour,</b>                  7 <b>it's difficult, it's difficult. There has to -- has to</b>                  8 <b>be change and there will be change, obviously, but</b>                  9 <b>actually I am concerned about those safeguards so you</b>                  10 <b>don't have journalists being persecuted for carrying out</b>                  11 <b>their legitimate enquiries and police officers helping</b>                  12 <b>journalists when necessary or when appropriate.</b>                  13 LORD JUSTICE LEVESON: Well, necessary and appropriate                  14 are --                  15 <b>A. There's a judgment issue, also.</b>                  16 LORD JUSTICE LEVESON: Correct.                  17 <b>A. Yes.</b>                  18 LORD JUSTICE LEVESON: But in relation to leaks there have                  19 undeniably been serious leaks which it seems, looking at                  20 the papers, are not always in the public interest by any                  21 stretch of the imagination. That then you've not                  22 merely -- leak enquiries are very, very difficult, but                  23 you've not merely got to -- one of the reasons you need                  24 to find out who's doing what is to protect those who                  25 haven't done anything, and yet who all will fall under                  Page 36</p>

<p>1 suspicion.</p> <p>2 <b>A. Yes, I understand, yes.</b></p> <p>3 LORD JUSTICE LEVESON: So it's to acquit the innocent just</p> <p>4 as much, if not more, than to find out who is</p> <p>5 responsible.</p> <p>6 <b>A. Yes, yes.</b></p> <p>7 LORD JUSTICE LEVESON: A very good example of the issue we</p> <p>8 could talk about was that article that you wrote about</p> <p>9 the new evidence in the Lawrence case, which actually</p> <p>10 gave you the decision, the pen to decide whether it's in</p> <p>11 the public interest to say this, and there wasn't quite</p> <p>12 the dialogue --</p> <p>13 <b>A. Yes, yes.</b></p> <p>14 LORD JUSTICE LEVESON: -- that got for you from Mr Driscoll,</p> <p>15 "Actually, there are these problems about this", and</p> <p>16 it's a good example because you were both on the same</p> <p>17 side in this case. It's not as though you were trying</p> <p>18 to expose anything that the police weren't doing, and</p> <p>19 it's not as though you wanted the police to do something</p> <p>20 different to that which they were doing, so you were</p> <p>21 both on the same side and that's where it becomes very,</p> <p>22 very difficult.</p> <p>23 <b>A. It does.</b></p> <p>24 LORD JUSTICE LEVESON: Of course I appreciate you don't</p> <p>25 necessarily know and he doesn't tell you because he</p> <p style="text-align: center;">Page 37</p>	<p>1 look at it through your spectacles, a police officer</p> <p>2 will look at it through his spectacles, and I'm trying</p> <p>3 to combine the various interests.</p> <p>4 <b>A. Thank you.</b></p> <p>5 MR JAY: Yes, those are all my questions.</p> <p>6 <b>A. Thank you.</b></p> <p>7 LORD JUSTICE LEVESON: Is there anything you want to add to</p> <p>8 what you've previously said?</p> <p>9 <b>A. No, I just hope that when you come in -- when you</b></p> <p>10 <b>consider your report and write it up, that, you know,</b></p> <p>11 <b>the importance of public interest and investigative</b></p> <p>12 <b>journalism is considered. I'm sure it will be, but, you</b></p> <p>13 <b>know, it's -- the Metropolitan Police, huge public body,</b></p> <p>14 <b>50,000 staff, just one force, it's like journalists,</b></p> <p>15 <b>it's not above scrutiny.</b></p> <p>16 LORD JUSTICE LEVESON: I entirely endorse the importance of</p> <p>17 investigative journalists.</p> <p>18 <b>A. Mm.</b></p> <p>19 LORD JUSTICE LEVESON: And of investigative journalism and</p> <p>20 the great value for good that it can have. And you are</p> <p>21 there to hold the police to account. But I will ask</p> <p>22 you, as I asked some of your colleagues yesterday: who</p> <p>23 is holding you to account?</p> <p>24 <b>A. Of course. Absolutely.</b></p> <p>25 LORD JUSTICE LEVESON: Thank you.</p> <p style="text-align: center;">Page 39</p>
<p>1 wants to keep the whole thing tight, and therefore we</p> <p>2 have to think of a way that provides a mechanism --</p> <p>3 <b>A. Yes.</b></p> <p>4 LORD JUSTICE LEVESON: -- for safe discussion which works</p> <p>5 both for the public interest --</p> <p>6 <b>A. Yes.</b></p> <p>7 LORD JUSTICE LEVESON: -- respects freedom of expression --</p> <p>8 <b>A. Yes.</b></p> <p>9 LORD JUSTICE LEVESON: -- but respects the integrity of</p> <p>10 investigations.</p> <p>11 <b>A. Absolutely.</b></p> <p>12 LORD JUSTICE LEVESON: Now that's the trick and if you think</p> <p>13 of a solution --</p> <p>14 <b>A. Can I -- we will be putting in a submission at the end</b></p> <p>15 <b>of this Inquiry, of this part of this module, so I will</b></p> <p>16 <b>think very carefully.</b></p> <p>17 LORD JUSTICE LEVESON: Thank you.</p> <p>18 <b>A. Hopefully I'll come up with something.</b></p> <p>19 LORD JUSTICE LEVESON: Thank you. You've heard me ask</p> <p>20 everybody from all their different fields.</p> <p>21 <b>A. Yes.</b></p> <p>22 LORD JUSTICE LEVESON: I am very conscious this is your</p> <p>23 world, not mine.</p> <p>24 <b>A. Yes.</b></p> <p>25 LORD JUSTICE LEVESON: But it's inevitable that you will</p> <p style="text-align: center;">Page 38</p>	<p>1 MR JAY: Thank you, Mr Wright.</p> <p>2 <b>A. Okay.</b></p> <p>3 LORD JUSTICE LEVESON: Well, shall we have a few minutes now</p> <p>4 before Mr Brett or do you just want to crack on?</p> <p>5 MR JAY: Possibly a few minutes now.</p> <p>6 (3.02 pm)</p> <p>7 (A short break)</p> <p>8 (3.12 pm)</p> <p>9 LORD JUSTICE LEVESON: Yes.</p> <p>10 MR JAY: The next witness is Mr Brett, please.</p> <p>11 LORD JUSTICE LEVESON: Thank you.</p> <p>12 MR ALASTAIR JOHN BRETT (sworn)</p> <p>13 Questions by MR JAY</p> <p>14 MR JAY: First of all, your full name, please?</p> <p>15 <b>A. Alastair John Brett.</b></p> <p>16 Q. You provided the Inquiry with a witness statement signed</p> <p>17 and dated by you 5 March under a standard statement of</p> <p>18 truth. Is this your formal evidence to the Inquiry?</p> <p>19 <b>A. It is.</b></p> <p>20 Q. In terms of your career, after working at two firms of</p> <p>21 solicitors, you moved to the Times in 1977 and for 33</p> <p>22 years, until 2010, you were the in-house lawyer at TNL,</p> <p>23 Times Newspapers Limited, which of course is the</p> <p>24 publisher of both the Times and the Sunday Times; is</p> <p>25 that correct?</p> <p style="text-align: center;">Page 40</p>

<p>1 <b>A. That's correct, yes.</b></p> <p>2 Q. You tell us that you worked under eleven editors, you've</p> <p>3 plainly had vast experience in the area of media law</p> <p>4 generally?</p> <p>5 <b>A. Yes, I think so.</b></p> <p>6 Q. And you provided, along with Sir Charles Gray,</p> <p>7 a submission to this Inquiry which we may well come back</p> <p>8 to at the end of your evidence, if I may.</p> <p>9 We've asked you to deal with the NightJack story and</p> <p>10 Mr Foster. Can I take you first of all, please, to</p> <p>11 paragraph 8 of your statement?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. So we understand the context. Patrick Foster saw you on</p> <p>14 about 20 May 2009 about a story he was working on. He</p> <p>15 came into your office with Mr Martin Barrow, who was the</p> <p>16 home news editor, his immediate line manager. Mr Barrow</p> <p>17 indicated that Mr Foster had a problem about a story he</p> <p>18 was working on. Mr Barrow then left and there was</p> <p>19 a conversation off the record. What does "off the</p> <p>20 record" mean in this sort of context, Mr Brett?</p> <p>21 <b>A. A duty of confidentiality. The journalist would say,</b></p> <p>22 <b>"Can I talk to you in confidence, Alastair?"</b></p> <p>23 Q. What would be, though, the limits of that duty?</p> <p>24 Presumably duties owed to the court would be higher</p> <p>25 duties, would they not?</p> <p style="text-align: center;">Page 41</p>	<p>1 <b>go in the same direction.</b></p> <p>2 LORD JUSTICE LEVESON: I understand that, but why would</p> <p>3 there be legal advice privilege? If somebody comes to</p> <p>4 me for advice now, not when I was in practice, besides</p> <p>5 telling them it's not worth a great deal, I don't</p> <p>6 suppose that the discussion would engage privilege at</p> <p>7 all, would it?</p> <p>8 <b>A. In your current situation, no. But even before.</b></p> <p>9 LORD JUSTICE LEVESON: Or even before, yes.</p> <p>10 <b>A. If I'm approached by somebody for legal advice, and</b></p> <p>11 <b>I was, I think I would regard that as covered by legal</b></p> <p>12 <b>professional privilege.</b></p> <p>13 LORD JUSTICE LEVESON: I'll have to think about that.</p> <p>14 <b>A. It raises all sorts of interesting questions about</b></p> <p>15 <b>in-house lawyers.</b></p> <p>16 LORD JUSTICE LEVESON: Indeed.</p> <p>17 MR JAY: But maybe you're using the term "off the record",</p> <p>18 if I may say so, without legal precision. Clearly you</p> <p>19 would be advising your employer, that entity would be</p> <p>20 your client, and legal advice or legal professional</p> <p>21 privilege would attach, but if you're advising an</p> <p>22 employee of your employer, and that employee may be in</p> <p>23 breach of duty to his employer, then there's -- I won't</p> <p>24 say a difficult situation --</p> <p>25 <b>A. That's precisely the word I was going to use:</b></p> <p style="text-align: center;">Page 43</p>
<p>1 <b>A. Yes, that would be right.</b></p> <p>2 LORD JUSTICE LEVESON: Neither is quite the same as</p> <p>3 a privileged situation, is it?</p> <p>4 <b>A. A privileged situation would obviously be where you're</b></p> <p>5 <b>giving advice of some kind or other but that</b></p> <p>6 <b>presupposes --</b></p> <p>7 LORD JUSTICE LEVESON: He's just about to ask you for some.</p> <p>8 <b>A. Yes, he is.</b></p> <p>9 LORD JUSTICE LEVESON: So would you consider that</p> <p>10 privileged?</p> <p>11 <b>A. I probably would regard it as privileged, yes.</b></p> <p>12 <b>Privileged and confidential.</b></p> <p>13 MR JAY: So it attracts, in your view, legal advice</p> <p>14 privilege, have I correctly understood it?</p> <p>15 <b>A. Yes.</b></p> <p>16 LORD JUSTICE LEVESON: But he's not your client.</p> <p>17 <b>A. No, my employer is my client. This is the dilemma</b></p> <p>18 <b>you're faced with. You have a journalist coming to you</b></p> <p>19 <b>and saying, "Can I talk to you Alastair, I need some</b></p> <p>20 <b>advice, can I talk to you confidentially?" and I would</b></p> <p>21 <b>say, "Yes, of course you can". That leads you into the</b></p> <p>22 <b>difficult dilemma that you obviously have personal</b></p> <p>23 <b>relationships with the journalists on the newsroom</b></p> <p>24 <b>floor, but you equally have a duty to your employer, the</b></p> <p>25 <b>company, the newspaper. And the two don't necessarily</b></p> <p style="text-align: center;">Page 42</p>	<p>1 <b>a difficult situation.</b></p> <p>2 Q. Maybe the correct analysis is that there isn't legal</p> <p>3 advice privilege in relation to those relations. What</p> <p>4 happens if the employer asks you to give them the gist</p> <p>5 of the conversation you've just had with Mr Foster?</p> <p>6 <b>A. That's precisely when I have a ghastly, horrible,</b></p> <p>7 <b>difficult situation in front of me.</b></p> <p>8 Q. Let's see whether it has any bearing on subsequent</p> <p>9 events.</p> <p>10 <b>A. Okay.</b></p> <p>11 Q. This conundrum which may or may not have been</p> <p>12 identified. What he told you in a nutshell was that</p> <p>13 he'd found out that NightJack was DC Richard Horton, and</p> <p>14 had been using confidential police information on his</p> <p>15 blog and that publishing a story about this would be in</p> <p>16 the public interest. But then in paragraph 9 he told</p> <p>17 you how he gained access to that information, which was</p> <p>18 by intruding into NightJack's email account; is that</p> <p>19 correct?</p> <p>20 <b>A. That's correct, yes.</b></p> <p>21 Q. When you say, at the end of paragraph 9, this</p> <p>22 immediately raised serious alarm bells with you and you</p> <p>23 told him what he'd done was totally unacceptable,</p> <p>24 presumably your immediate reaction was: he may have</p> <p>25 committed a criminal offence?</p> <p style="text-align: center;">Page 44</p>

11 (Pages 41 to 44)

<p>1 <b>A. Precisely.</b></p> <p>2 Q. You were naturally aware of some of the criminal law in</p> <p>3 this area, because you refer in paragraph 10 to the Data</p> <p>4 Protection Act and Section 55, so was it your state of</p> <p>5 mind on 20 May, before you looked up the point in any</p> <p>6 book or spoke to any barrister, that there was a public</p> <p>7 interest defence to Section 55?</p> <p>8 <b>A. I knew there was a public interest defence to</b></p> <p>9 <b>Section 55, and this situation could be covered by that</b></p> <p>10 <b>public interest defence, yes.</b></p> <p>11 Q. Had you heard of the Computer Misuse Act?</p> <p>12 <b>A. I hadn't at that stage.</b></p> <p>13 Q. You tell us that you sought advice from libel chambers.</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Almost immediately after this conversation, maybe when</p> <p>16 Mr Foster was there, and the advice you received, but it</p> <p>17 was off the cuff advice, was that Section 55 prima facie</p> <p>18 applied, in other words there was an offence under</p> <p>19 Section 55 but it was subject to a possible public</p> <p>20 interest defence?</p> <p>21 <b>A. Yes, that's roughly the situation, yes.</b></p> <p>22 Q. Can I ask you to deal with the disciplinary</p> <p>23 ramifications of this? What was your thinking about the</p> <p>24 need, if any, to take this up the chain to Mr Foster's</p> <p>25 line managers?</p> <p style="text-align: center;">Page 45</p>	<p>1 under -- so he wasn't guilty of crime --</p> <p>2 <b>A. No, but at that stage the public interest, was it going</b></p> <p>3 <b>to be in the public interest to expose NightJack?</b></p> <p>4 LORD JUSTICE LEVESON: But that's -- that shouldn't make you</p> <p>5 furious. That may be a nice legal question: could you</p> <p>6 argue that it's in the public interest to expose an</p> <p>7 unknown blogger? That's meat and drink for a lawyer.</p> <p>8 But talk about being in an incredibly difficult position</p> <p>9 or totally unacceptable conduct and serious alarm bells</p> <p>10 suggests, even when you're worked out there is a public</p> <p>11 interest defence, that what he was doing was utterly</p> <p>12 unacceptable. In other words, unethical, if not</p> <p>13 illegal.</p> <p>14 <b>A. Yes, it was unethical.</b></p> <p>15 LORD JUSTICE LEVESON: So it's unethical even if there is</p> <p>16 a public interest defence?</p> <p>17 <b>A. If he'd come to me and said, "I've found out from</b></p> <p>18 <b>getting into this chap's computer that a company is</b></p> <p>19 <b>selling products which are going to kill people",</b></p> <p>20 <b>I would have gone straight downstairs and said, "Look,</b></p> <p>21 <b>we have to get this out immediately". That is a clear,</b></p> <p>22 <b>manifest public interest defence, and in those</b></p> <p>23 <b>circumstances I think my reaction wouldn't have been</b></p> <p>24 <b>quite what it was in this case, which was -- I was told</b></p> <p>25 <b>it was a one-off occasion, and he'd just done this and</b></p> <p style="text-align: center;">Page 47</p>
<p>1 <b>A. Well, his line manager was Martin Barrow, who'd come</b></p> <p>2 <b>into the room with Patrick Foster, and said to me right</b></p> <p>3 <b>at the beginning of the conversation, "We have a problem</b></p> <p>4 <b>with a story that Patrick is working on." So the line</b></p> <p>5 <b>manager quite clearly knew the background to this. As</b></p> <p>6 <b>the line manager of the man who's in charge of the</b></p> <p>7 <b>newsroom and stories which go and do not go into the</b></p> <p>8 <b>Times, I regarded the line manager as the person</b></p> <p>9 <b>directly who would be discussing things with Patrick.</b></p> <p>10 <b>Patrick's not my direct -- people in my department come</b></p> <p>11 <b>under my control. Patrick didn't come under my control.</b></p> <p>12 <b>So Martin Barrow, as the person who was directly in</b></p> <p>13 <b>control of Patrick, would be the person who I assumed</b></p> <p>14 <b>would take up that kind of matter.</b></p> <p>15 <b>Patrick had spoken to me, as I said, off the record,</b></p> <p>16 <b>but in a confidential way, which -- and he then</b></p> <p>17 <b>apologised. When I said, "God, you just can't have done</b></p> <p>18 <b>this, can you?" -- I'm afraid the language was very</b></p> <p>19 <b>explicit, because I was very cross with him for having</b></p> <p>20 <b>done this, and he said, "Look, Alastair, I'm really</b></p> <p>21 <b>sorry, I won't do it again", because I said to him,</b></p> <p>22 <b>"Look, if you ever do this again, you'll get the sack,</b></p> <p>23 <b>just have no doubt about that", and so --</b></p> <p>24 LORD JUSTICE LEVESON: I'm sorry, what was your concern?</p> <p>25 You've worked out that he might very well have a defence</p> <p style="text-align: center;">Page 46</p>	<p>1 <b>I thought: right, the only thing I have to do is I have</b></p> <p>2 <b>to tell him, "You cannot behave like this in a proper</b></p> <p>3 <b>newspaper like the Times. The only way you can ever get</b></p> <p>4 <b>your story into the public domain is by doing</b></p> <p>5 <b>a legitimate piece of identification."</b></p> <p>6 LORD JUSTICE LEVESON: But your assessment of the position</p> <p>7 is that if it had been a really rock-crushing story, so</p> <p>8 that there's no argument about the public interest, then</p> <p>9 you'd have been fine with it?</p> <p>10 <b>A. I wouldn't have been fine with it. No, I wouldn't have</b></p> <p>11 <b>been fine with it, because I know full well, like</b></p> <p>12 <b>everybody else. What I didn't know was there was no</b></p> <p>13 <b>public interest defence under the Computer Misuse Act.</b></p> <p>14 <b>I was assuming that this could be -- what was going</b></p> <p>15 <b>through my mind was: I'm not sure which piece of</b></p> <p>16 <b>legislation he's actually breached, hence my</b></p> <p>17 <b>conversation with a junior barrister in 1 Brick Court.</b></p> <p>18 <b>I hadn't become -- I was not even aware of the Computer</b></p> <p>19 <b>Misuse Act at that stage. All I knew was that clearly</b></p> <p>20 <b>illegal accessing of somebody's computer and an email</b></p> <p>21 <b>was clearly a breach of some statute which was clearly</b></p> <p>22 <b>not acceptable. It was clearly criminal, but it might</b></p> <p>23 <b>have a defence.</b></p> <p>24 LORD JUSTICE LEVESON: Well -- sorry. I'll keep quiet in</p> <p>25 a bit. If there's a defence, it's not criminal.</p> <p style="text-align: center;">Page 48</p>

<p>1 <b>A. Precisely. But it's still -- but I -- you can't have</b>  2 <b>journalists hacking into people's email accounts.</b>  3 LORD JUSTICE LEVESON: I'm actually going to agree with you,  4 but we may not have got there quite the same way. All  5 right.  6 MR JAY: Mr Brett, you say in the third sentence of  7 paragraph 12 of your statement you told Mr Foster you'd  8 have to give careful consideration to whether or not you  9 would report the matter to David Chappell, who is the  10 managing editor of the paper. That might suggest that  11 even though the conversation with Mr Foster was off the  12 record, that wasn't going to carry very much weight if  13 there was a need to report the matter to someone else;  14 have I understood it correctly?  15 <b>A. I think that's correct, yes.</b>  16 Q. And your thinking then was regardless of whether or not  17 a criminal offence had been committed, because there  18 were serious ethical issues here, that would warrant or  19 might warrant consideration by those responsible for the  20 disciplinary processes of the newspaper?  21 <b>A. Yes, correct.</b>  22 Q. Can I move on then to paragraph 13? About six lines  23 down, our page 13461:  24 "He said he thought he could identify NightJack  25 using publicly available sources of information. I told</p> <p style="text-align: center;">Page 49</p>	<p>1 Mr Foster had the advantage of knowing the answer to his  2 question, and therefore having to tie up, a much easier  3 exercise, the identity which he knew with publicly  4 available material which he could ascertain, perhaps  5 using the identity which he knew. So, working from the  6 inside of the maze outwards with Mr Foster, the  7 hypothetical journalist is working from the outside of  8 the maze inwards, isn't he or she?  9 <b>A. I totally agree that it would be more difficult for</b>  10 <b>a journalist who hadn't been inside the maze to get</b>  11 <b>there.</b>  12 Q. But isn't it really rather just cosmetic that, okay,  13 Mr Foster might be able to do this by ascertaining  14 legitimate sources of information, but he knows the  15 answer anyway, it's a much easier exercise, it's  16 a cosmetic process?  17 <b>A. No, it wasn't.</b>  18 Q. Why not?  19 <b>A. Because he had to demonstrate to me and to certainly</b>  20 <b>Horton and everybody else that he could do it</b>  21 <b>legitimately from outside in, and that's what he did.</b>  22 LORD JUSTICE LEVESON: But he couldn't. How do you know he  23 could? Because he's choosing what facts he's chasing up  24 on. Of course it all looks beautiful in his statement,  25 and I understand that, but because he knows what facts</p> <p style="text-align: center;">Page 51</p>
<p>1 him that even if he could identify NightJack through  2 totally legitimate means, he would still have to put the  3 allegation to DC Horton before publication."  4 And you explain that that is called "fronting up",  5 and that's an essential part of Reynolds.  6 So was it thinking at that stage that provided that  7 Mr Foster could identify NightJack using material in the  8 public domain, it might be appropriate to publish the  9 story?  10 <b>A. Correct, yes.</b>  11 Q. Even though the identification of NightJack using  12 publicly available sources of information would be, as  13 I think David Allen Green explained to the Inquiry,  14 rather like working from the inside of a maze outwards?  15 <b>A. That is a perfectly correct way of describing it,</b>  16 <b>working in-out. But if he or any other journalist could</b>  17 <b>identify NightJack through legitimate sources and</b>  18 <b>information in the public domain, then he has what</b>  19 <b>I could see -- what I felt was a perfectly legitimate</b>  20 <b>public interest story.</b>  21 Q. Can we just test this a little bit, Mr Brett. The  22 hypothetical other journalist who doesn't know the  23 answer to the question he or she has set himself, namely  24 "Who is NightJack?" would have to use publicly available  25 sources of information but working, as it were, blind.</p> <p style="text-align: center;">Page 50</p>	<p>1 he's looking for, he knows what bits he has to join  2 together, he knows the attributes and characteristics of  3 the person he has to search out, so he can search out  4 for somebody with those corresponding characteristics.  5 <b>A. All I can say is that at the time he persuaded me that</b>  6 <b>he was able, through the Jujitsu Club, the references on</b>  7 <b>the blog site to cases which he'd been able to identify,</b>  8 <b>that he could quite clearly show that the only person</b>  9 <b>who had to be NightJack was DC Horton. He was the only</b>  10 <b>DC of the Jujitsu Club.</b>  11 MR JAY: It is made, though, a lot easier for Mr Foster if  12 he knows the answer, isn't it?  13 <b>A. It must be.</b>  14 Q. Why didn't you at this stage, Mr Brett, just say to him,  15 "Let's forget this story, let's move on to another  16 story", give Mr Foster the appropriate earful, or  17 perhaps more, and move on?  18 <b>A. But Mr Jay, my job is not to tell journalists which</b>  19 <b>stories they should pursue or not. My job is to react</b>  20 <b>to somebody bringing a story to me and me then saying</b>  21 <b>either this is publishable or it's dead in the water.</b>  22 <b>Martin Barrow could have said to him, "Look, we just</b>  23 <b>have to lay off this story", but he didn't, I don't</b>  24 <b>think, partly, I suppose, because of what I'd said.</b>  25 Q. Could you not foresee problems, that if the matter</p> <p style="text-align: center;">Page 52</p>

<p>1 turned litigious, as it did, then a certain account of 2 what happened would have to be given to the court? 3 <b>A. At that stage I didn't think -- and I think as I make 4 clear in my statement, I didn't believe that Horton -- 5 Horton had been approached by Patrick Foster on the 6 Wednesday, and that caused the letter from Olswang to 7 come to the Times, to the editor's office. I didn't 8 actually think that Horton would actually, in the light 9 of what he had said to Patrick Foster, would commence 10 proceedings. That absolutely surprised me. And so 11 I wasn't thinking in those -- at that stage that this 12 would provoke court proceedings.</b> 13 Q. Let's examine the chronology. Mr Foster having, as it 14 were, cracked the code on or about 27 May -- 15 <b>A. No, no, no, earlier, much earlier. He cracked the 16 code -- if you're talking about when he guesses the 17 password to NightJack's email -- no, you're not?</b> 18 Q. No, I'm talking about ascertaining his identity through 19 publicly available sources of information. 20 <b>A. Yes, that's something that --</b> 21 Q. The second cracking of the code, that happened on or 22 about 27 May. Mr Foster then speaks to DC Horton. 23 There's a conversation where DC Horton does not deny 24 that he's NightJack but says, "You'll get me into 25 trouble with my employers if you publish", or words to Page 53</p>	<p>1 <b>asked me to go down and see him.</b> 2 Q. The undertaking itself is at page 3 of JH3. You were 3 away for a couple of days. You returned to the office 4 on 28 May and then there was a conversation with 5 Mr Barrow, I think, which you had? 6 <b>A. That's correct, yes.</b> 7 Q. Can I ask you, please, about that conversation, 8 paragraph 18 of your statement. You regarded this as 9 a matter of legal interest, because it raised section 12 10 HRA issues and contemporary issues regarding the 11 anonymity and identity of bloggers? 12 <b>A. Correct.</b> 13 Q. You say four lines down paragraph 18: 14 "I remember making two specific points. First, it 15 was very likely that NightJack would be identified and 16 be named by his own police force in days if not weeks as 17 they had started an inquiry ..." 18 It might be said that that investigation by 19 DC Horton's own police force was one which Mr Foster 20 himself had instigated because he informed the police 21 force. 22 <b>A. That's correct.</b> 23 Q. Do you see that? So it's all part and parcel of the 24 same web of events, isn't it? 25 <b>A. It's all part of a series of events, yes.</b> Page 55</p>
<p>1 that effect? 2 <b>A. Correct.</b> 3 Q. That very answer from DC Horton effectively establishes 4 that -- well, Mr Foster knows anyway who he is, but it's 5 pretty strong evidence in Mr Foster's mind? 6 <b>A. Yes.</b> 7 Q. And then there is a letter, which I think is page 1 of 8 JH3, where there's the first mention of possible 9 litigation. 10 <b>A. That's correct, yes.</b> 11 Q. So, contrary to your prognostication, as it were, it's 12 clear by then that the matter could well be turning 13 litigious; is that right? 14 <b>A. That is correct, yes.</b> 15 Q. Moving on to paragraph 16 of your statement: 16 "It then seems that the editor delegated to 17 Mr Barrow or Keith Blackmore, the deputy editor, the job 18 of giving instructions to Stuart Patrick, the night 19 lawyer on duty to give an undertaking that the Times 20 would not publish the story ... without giving Olswang 21 ... 12 hours notice ..." 22 Where do you get that from, the editor giving 23 instructions? 24 <b>A. I was not in the office on that day. I was never shown 25 that letter until the next morning when Martin Barrow</b> Page 54</p>	<p>1 LORD JUSTICE LEVESON: But you're using as a reason 2 something that you yourself have done. Not you 3 personally, but the Times. 4 <b>A. Certainly Patrick had approached the Lancashire police 5 and said, "I believe that NightJack is DC Horton", yes.</b> 6 MR JAY: But what had happened in the chain of events -- 7 <b>A. But he between the 20th, coming to see me, and the 27th, 8 when he actually approaches the Lancashire police and 9 DC Horton, he has done this, because at some stage he 10 rings me and says, "Alastair, I can do this perfectly 11 legitimately". He tells me all that on the phone and 12 explains something about a Jujitsu club, and I can't 13 remember exactly what he explained now because it was 14 all oral, but he tells me that, and the next thing 15 I know is I'm called in to see Martin Barrow on the 28th 16 because he's approached Horton on the 27th.</b> 17 Q. We have a chain of events of ascertaining the identity 18 in the first place by email hacking? 19 <b>A. Yes.</b> 20 Q. Then carrying out this public domain exercise -- 21 <b>A. Yes.</b> 22 Q. -- which probably was facilitated to some extent by 23 knowing the answer to the question, then fronting it up 24 with DC Horton. Then Mr Foster speaking to his 25 employer. So we're at that position -- Page 56</p>

14 (Pages 53 to 56)

<p>1 <b>A. Absolutely, yes.</b></p> <p>2 Q. -- by the time we have this call.</p> <p>3 <b>A. That's right.</b></p> <p>4 Q. The second point that was passing through your mind at</p> <p>5 that stage was that you didn't think that there would be</p> <p>6 an application for an injunction, did you?</p> <p>7 <b>A. No, as you can see from my statement when I was talking</b></p> <p>8 <b>to Martin Barrow, I said: in the light of what Horton</b></p> <p>9 <b>said to Patrick Foster yesterday I think it's most</b></p> <p>10 <b>unlikely he'll actually going for an injunction, I think</b></p> <p>11 <b>this is what you might call a threatening lawyer's</b></p> <p>12 <b>letter and the likelihood of it actually escalating into</b></p> <p>13 <b>an injunction is very remote, and I got that completely</b></p> <p>14 <b>wrong.</b></p> <p>15 Q. Another factor, paragraph 20 of your statement, was that</p> <p>16 Mr Barrow told you he was still keen to get the story</p> <p>17 into the Times:</p> <p>18 "I can now see he had emailed Mr Foster the day</p> <p>19 before saying that the editor is keen, suggests</p> <p>20 a page 4."</p> <p>21 The editor Mr Harding at that point would not have</p> <p>22 known about the initial email hacking, would he?</p> <p>23 <b>A. Unless Mr Barrow had talked to him about it.</b></p> <p>24 Q. Well, Mr Harding's evidence was there had been no such</p> <p>25 discussion.</p> <p style="text-align: center;">Page 57</p>	<p>1 defendant owes a duty not to mislead the court?</p> <p>2 <b>A. Correct, yes.</b></p> <p>3 Q. But as soon as the matter did turn litigious, which it</p> <p>4 did fairly soon afterwards, didn't it become clear to</p> <p>5 you that the court would be at risk of being misled,</p> <p>6 given that you would have, through Mr Foster, to give</p> <p>7 the court an account of what occurred?</p> <p>8 <b>A. Mr Foster had by this stage done the exercise totally</b></p> <p>9 <b>legitimately.</b></p> <p>10 LORD JUSTICE LEVESON: No, he hadn't, with great respect.</p> <p>11 He'd used what he knew and found a way through to</p> <p>12 achieve the same result. Because he couldn't put out of</p> <p>13 his mind that which he already knew.</p> <p>14 <b>A. Well, my Lord, all I can do is say that when</b></p> <p>15 <b>Patrick Foster told me how he'd done it legitimately,</b></p> <p>16 <b>I believed him.</b></p> <p>17 LORD JUSTICE LEVESON: Yes, I understand what you're saying.</p> <p>18 <b>A. Yes.</b></p> <p>19 LORD JUSTICE LEVESON: But we can't lose sight of reality in</p> <p>20 all this, can we?</p> <p>21 <b>A. No. No, we certainly can't, no.</b></p> <p>22 MR JAY: I just wonder, though, Mr Brett, in giving the</p> <p>23 account to the court, why not leave it to the court to</p> <p>24 decide this issue? You could tell the court, okay, we</p> <p>25 started off by email hacking, there was then this</p> <p style="text-align: center;">Page 59</p>
<p>1 <b>A. I am absolutely sure that James didn't know about it,</b></p> <p>2 <b>no, I'm sure he didn't, because I remember</b></p> <p>3 <b>David Chappell telling me afterwards how cross</b></p> <p>4 <b>James Harding had been when he heard the full story some</b></p> <p>5 <b>time after 4 June.</b></p> <p>6 Q. In paragraph 21, you explain your role as legal manager.</p> <p>7 It amounts to this, that your instructions are coming</p> <p>8 from the editor or the editor's delegates?</p> <p>9 <b>A. Correct.</b></p> <p>10 Q. Is it not, though, your duty to explain what might</p> <p>11 happen if litigation were to erupt?</p> <p>12 <b>A. Yes, it would be. I'd normally expect to give advice on</b></p> <p>13 <b>that front and I think my reaction was I cannot believe</b></p> <p>14 <b>that if you look at this in terms of straight privacy</b></p> <p>15 <b>law, confidence law, that he's likely to get home and</b></p> <p>16 <b>dry.</b></p> <p>17 Q. Although in the course of defending the application for</p> <p>18 an injunction, circumstances might arise in which</p> <p>19 a factual account would have to be given to the courts.</p> <p>20 That would obviously be foreseeable, wouldn't it?</p> <p>21 <b>A. Obviously, yes.</b></p> <p>22 Q. And whatever the legal analysis as to where privacy law</p> <p>23 might be going at the particular point, I mean we know</p> <p>24 that Mr Justice Eady agreed with you on the first stage</p> <p>25 analysis, it's so obvious it goes without saying, the</p> <p style="text-align: center;">Page 58</p>	<p>1 conversation -- to which privilege I suppose would have</p> <p>2 to be waived, but there isn't a difficulty about that --</p> <p>3 on 20 May, then there's the finding it out anyway</p> <p>4 through the public domain. You could be entirely</p> <p>5 upfront with the court about this and still win the</p> <p>6 case, couldn't you?</p> <p>7 <b>A. Well, I personally felt that I had a duty of confidence</b></p> <p>8 <b>to Patrick Foster. I told him his story was dead in the</b></p> <p>9 <b>water while he had done it incorrectly. He then</b></p> <p>10 <b>persuaded me that he'd done it correctly and at that</b></p> <p>11 <b>stage he'd then gone to Horton, without my knowing, and</b></p> <p>12 <b>put it to Horton, and Horton, as you have said,</b></p> <p>13 <b>basically said neither "yes" or "no", and "I might be</b></p> <p>14 <b>disciplined", and I believed and certainly Martin Barrow</b></p> <p>15 <b>believed and certainly Patrick Foster believed that</b></p> <p>16 <b>there was a public interest in a police officer who was</b></p> <p>17 <b>misusing information and putting it onto a public blog</b></p> <p>18 <b>site.</b></p> <p>19 Q. But you've already agreed with me, though, that the duty</p> <p>20 of confidence could be trumped by a higher obligation to</p> <p>21 undertake a disciplinary process?</p> <p>22 <b>A. Sorry, whose --</b></p> <p>23 Q. That's what you say in your witness statement, that you</p> <p>24 were giving consideration of --</p> <p>25 <b>A. Yes, but only in the circumstances if Patrick Foster</b></p> <p style="text-align: center;">Page 60</p>

<p>1 <b>either did it again or began to indulge in something</b></p> <p>2 <b>which I'd told him was totally unacceptable. I thought</b></p> <p>3 <b>this was a one-off until the Tuesday morning when I got</b></p> <p>4 <b>in, I suddenly found that apparently he'd been</b></p> <p>5 <b>rusticated at Oxford and I went virtually through the</b></p> <p>6 <b>roof at that stage.</b></p> <p>7 Q. I must say I read paragraph 12, when you say in the</p> <p>8 second line you've had to "give careful consideration as</p> <p>9 to whether or not I reported the matter to</p> <p>10 David Chappell", that that was arising out of what he</p> <p>11 did to DC Horton's email account, rather than looking</p> <p>12 forward to any future infraction. Have I misunderstood</p> <p>13 it?</p> <p>14 <b>A. I think I was actually concentrating on -- he told me</b></p> <p>15 <b>this was a one-off. He wanted to know whether he had</b></p> <p>16 <b>a public interest defence or not. I said, "You may have</b></p> <p>17 <b>a public interest defence, but this is totally</b></p> <p>18 <b>unacceptable behaviour by a Times journalist."</b></p> <p>19 LORD JUSTICE LEVESON: If you look at paragraph 12, is</p> <p>20 Mr Jay right? Just of your statement.</p> <p>21 <b>A. I'm pretty -- well, I can't remember exactly what I said</b></p> <p>22 <b>to Patrick Foster, but I undoubtedly said to him, "Look,</b></p> <p>23 <b>you cannot do this again. I'm going to have to give</b></p> <p>24 <b>very serious consideration to reporting this to</b></p> <p>25 <b>David Chappell", and he then almost certainly said to</b></p> <p style="text-align: center;">Page 61</p>	<p>1 <b>to make an admission that he had committed a criminal</b></p> <p>2 <b>offence, or not, as the case may be, depending on the</b></p> <p>3 <b>public interest element to it.</b></p> <p>4 Q. You explain in your statement that you didn't obtain</p> <p>5 either junior or leading counsel's advice on this</p> <p>6 particular point?</p> <p>7 <b>A. No, I didn't.</b></p> <p>8 LORD JUSTICE LEVESON: You didn't think it was right to</p> <p>9 say -- I don't want to embarrass Mr White, but to say to</p> <p>10 Mr White, "Now look, there is a background to this that</p> <p>11 you ought to know about so that we under no</p> <p>12 circumstances mislead the court"?</p> <p>13 <b>A. I never certainly mentioned it to Antony and I was</b></p> <p>14 <b>working still on the basis of -- perhaps I was making</b></p> <p>15 <b>a wrong decision but I was compartmentalising things.</b></p> <p>16 <b>I was putting the earlier email hacking into</b></p> <p>17 <b>a compartment and that was prior to what I believed was</b></p> <p>18 <b>a wholly legitimate process of identification.</b></p> <p>19 Q. In terms of the sequence of events -- we know much of</p> <p>20 the relevant sequence through Mr Harding, when he gave</p> <p>21 his evidence -- information came to light I think on</p> <p>22 2 June that Mr Foster had been temporarily rusticated at</p> <p>23 Oxford for accessing a computer unlawfully; is that</p> <p>24 correct?</p> <p>25 <b>A. That's correct, yes.</b></p> <p style="text-align: center;">Page 63</p>
<p>1 <b>me, "I'm really sorry, I won't do it again".</b></p> <p>2 MR JAY: The duty of confidence you refer to, that in any</p> <p>3 event would be trumped by your higher duty to the court,</p> <p>4 wouldn't it?</p> <p>5 <b>A. Yes, it would, yes.</b></p> <p>6 Q. By the time you became aware, as you did subsequently,</p> <p>7 that the Computer Misuse Act 1990 was also involved, and</p> <p>8 it lacked a public interest defence, the duty of</p> <p>9 confidence which you believe existed was, to use your</p> <p>10 term, dead in the water, wasn't it?</p> <p>11 <b>A. My duty to the court was obviously not to mislead the</b></p> <p>12 <b>court.</b></p> <p>13 Q. Mm.</p> <p>14 <b>A. And what I was doing at that stage I was concentrating</b></p> <p>15 <b>on Patrick had done this, I believed, wholly legally.</b></p> <p>16 <b>As he'd done it wholly legally, I was prepared to put on</b></p> <p>17 <b>one side the fact that he'd earlier, wholly improperly,</b></p> <p>18 <b>hacked the email account.</b></p> <p>19 Q. In telling this story to the court, you obviously start</p> <p>20 at letter A and you move forward to letter Z, but in</p> <p>21 this case you were starting at letter B or C, weren't</p> <p>22 you?</p> <p>23 <b>A. I didn't believe that was the case, no. I believed that</b></p> <p>24 <b>he was -- if he could do this wholly legitimately and</b></p> <p>25 <b>there was a public interest in it, I didn't think he had</b></p> <p style="text-align: center;">Page 62</p>	<p>1 Q. I think the relevant emails are in JH4. Page 27. At</p> <p>2 the bottom of the page you send an email to junior</p> <p>3 counsel at 9.00 in the morning when you refer to the</p> <p>4 skeleton arguments. You refer then to your opponent's</p> <p>5 second witness statement. That made reference to the</p> <p>6 rustication, temporary though, at Oxford, didn't it?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Then you expressed certain views about the law, and then</p> <p>9 on the next page, page 28, the continuation of the</p> <p>10 email:</p> <p>11 "Better to be forearmed in case it turns nasty."</p> <p>12 So this is always still a reference to the Oxford</p> <p>13 matter, it's not a reference to the second email hacking</p> <p>14 of DC Horton's account, is it?</p> <p>15 <b>A. Second --</b></p> <p>16 Q. Well, there's the first email hacking back in Oxford</p> <p>17 years before?</p> <p>18 <b>A. That's right.</b></p> <p>19 Q. And then there's the one which happened only a couple of</p> <p>20 weeks before this email of DC Horton's email account.</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. So the two occasions. So we're only looking at the</p> <p>23 first occasion, we're not looking at the second, are we?</p> <p>24 <b>A. I'm basically saying I would like advice from you as to</b></p> <p>25 <b>what happens if, given what we now know about Oxford, he</b></p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)



<p>1 <b>has actually hacked somebody's computer in an</b>  2 <b>unauthorised way. I'm asking a second opinion from</b>  3 <b>a second barrister, because the first barrister at</b>  4 <b>1 Brick Court had -- we'd only discussed the DPA.</b>  5 LORD JUSTICE LEVESON: He wasn't a criminal lawyer,  6 presumably, a libel lawyer?  7 <b>A. No, he wasn't, he was a libel lawyer.</b>  8 LORD JUSTICE LEVESON: Staying on the email on page 27 of  9 JH4, you say:  10 "Given Patrick's misdemeanours in Oxford, it may  11 well suggest he has been a naughty boy, even though he  12 can explain how he got Horton's name."  13 Well, his explanation about how he got Horton's name  14 was by hacking it. That was the explanation, really.  15 So you're not being clear with Mr Barnes is what I'm  16 just asking you about, I'm afraid, Mr Brett.  17 <b>A. I'm being oblique to an extent which is embarrassing,</b>  18 <b>yes, with Mr Barnes.</b>  19 MR JAY: Because, to be clear, Mr Barnes did not know about  20 Mr Foster's email hacking of DC Horton's account, did  21 he?  22 <b>A. No, he didn't, no.</b>  23 Q. We're looking here at Oxford, although you are saying  24 this is sort of similar fact evidence or you're  25 suggesting there might be similar fact evidence, he's</p> <p style="text-align: center;">Page 65</p>	<p>1 Q. That was the first time that you were aware of the  2 greater difficulty here with what Mr Foster had done at  3 Oxford and in relation to DC Horton, isn't it?  4 <b>A. Correct, yes.</b>  5 Q. When Mr Barnes says, as a PPS to his email, or the PS  6 is:  7 "Shall I copy this in to Antony?"  8 I don't think you deal with that, do you, later?  9 <b>A. I think I spoke to him on the phone. I remember having</b>  10 <b>a conversation on the phone with him, but I can't</b>  11 <b>remember now exactly what was said on the phone, other</b>  12 <b>than, "No, you don't need to bother copying this in to</b>  13 <b>Antony."</b>  14 Q. We know that Antony didn't get it, so there must have  15 been a conversation along those lines?  16 <b>A. Mm.</b>  17 Q. Later on:  18 "It ought all to be irrelevant on Thursday, they're  19 just looking for prej, but there's no separate law for  20 journalists outside of, for example, section 10."  21 So the point that's being made is that the Oxford  22 incident is just prejudice in relation to the DC Horton  23 issue, unless, of course, there's further evidence about  24 Mr Foster hacking into DC Horton's emails?  25 <b>A. Correct, yes.</b></p> <p style="text-align: center;">Page 67</p>
<p>1 naughty once, he might be naughty a second time, he may  2 well suggest he's been a naughty boy even though he can  3 explain how he got Horton's name. You're not suggesting  4 there that Mr Barnes knew the facts in relation to the  5 DC Horton hacking?  6 <b>A. No, I'm not.</b>  7 Q. But you were pointing out a possible difficulty. And  8 when you say on the next page, the continuation of the  9 email, "Please do not say anything to him", him there is  10 Mr Foster, "or Antony", Antony White, this is about the  11 Oxford issue, not about the DC Horton email hacking  12 issue, is it?  13 <b>A. I think I'm actually referring to the Horton incident</b>  14 <b>here. I don't -- no, I can't be, because it's all --</b>  15 <b>I mean, yes, Jonathan knows nothing about this.</b>  16 Q. I'm just clarifying that. If it were a reference to the  17 Horton matter then Mr Barnes would know something about  18 it, but he didn't.  19 <b>A. No, no, no, no. Yes, he didn't know.</b>  20 Q. The advice you got from Mr Barnes, which was targeting  21 to the Oxford issue, although the same legal point which  22 arises in relation to the Horton issue, he rightly  23 points you to the Computer Misuse Act and there isn't  24 a sniff of a public interest defence?  25 <b>A. That's correct.</b></p> <p style="text-align: center;">Page 66</p>	<p>1 Q. But an account had to be given to the court, and it is  2 right to say that Olswangs were onto the point that  3 DC Horton's email might have been hacked into by  4 Mr Foster?  5 <b>A. That's correct, yes.</b>  6 Q. So they were smelling a rat and they were smelling the  7 right rat, weren't they?  8 <b>A. They were certainly smelling a rat, yes.</b>  9 Q. Just a point about Mr Foster's witness statement.  10 I think there's some concern about this. It's dated  11 2 June, which is two days before the hearing, and it's  12 about the same time as the skeleton argument is being  13 prepared. I mean all of this is being done in somewhat  14 of a rush with urgent litigation, so that's understood.  15 But if you look at JH3, page 56, this point is made:  16 "Except for the information ventured in this witness  17 statement, I will not reveal information about any  18 confidential sources."  19 Do you feel that that is misleading?  20 <b>A. No, I don't. Confidential sources are people he's</b>  21 <b>talked to and he may have got information about</b>  22 <b>DC Horton from. And it's an absolutely typical</b>  23 <b>journalistic way of saying, "I'm not going to tell you</b>  24 <b>who my confidential sources are."</b>  25 Q. But if you look at his analysis of what he did, correct</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 me if I'm wrong, but does he refer to any confidential 2 sources rather than just ferreting around public domain 3 material, including the Internet? 4 <b>A. Well, there's talk about -- Patrick had phoned the 5 publishing house which had actually commissioned 6 DC Horton to write a book, and so he had clearly talked 7 to various people. He'd obviously talked to the 8 journalist at the Independent who'd actually interviewed 9 Horton as well. So he talked to a number of people who 10 would know that NightJack was Horton, but that's what 11 I assumed that was a reference to.</b> 12 LORD JUSTICE LEVESON: With great respect, it's smoke, isn't 13 it? There wasn't a confidential source here at all. 14 There was a hacking into an email. He may very well 15 have talked to all sorts of people, but to say "I won't 16 reveal information about confidential sources" suggests 17 he has confidential information from a source which he's 18 not going to talk about, for understandable reasons, but 19 in fact it's just not true. 20 <b>A. My Lord, at the hearing before Mr Justice Teare on the 21 Thursday, they had pleaded their case in the 22 alternative: either old-style confidence law, and 23 people -- a source who had been imbued with a duty of 24 confidence, either Patrick Foster had got it from 25 somebody who should have remained quiet because they'd</b> Page 69</p>	<p>1 <b>Thursday hearing prior to this statement being compiled.</b> 2 MR JAY: Olswangs were writing to you on 1 June, this is 3 page 47 of JH3, saying: 4 "We also ask that your journalist Mr Patrick Foster, 5 in a witness statement verified by a statement of truth 6 provided to us, (1) sets out how he ascertained the 7 following information concerning our client, (2) 8 confirmed that he did not at any time make any 9 unauthorised access into any email account owned by our 10 client. In this regard a suspicion arises Mr Foster may 11 indeed have done so." 12 And then various matters are then set out. It's 13 right to say that you didn't advise Mr Foster to address 14 this second point, did you? 15 <b>A. That's correct, I advised him to not engage on that 16 point.</b> 17 Q. Why not? 18 <b>A. Because he would obviously have to say --</b> 19 LORD JUSTICE LEVESON: The truth? 20 <b>A. He'd have to tell the truth, precisely.</b> 21 MR JAY: I just wonder, if it was all irrelevant, what was 22 the harm of him telling the truth? 23 <b>A. He'd be prosecuted. He'd come to me and told me he'd 24 asked for full legal advice and he told me just how 25 stupid he'd been.</b> Page 71</p>
<p>1 <b>been imbued with a duty of confidence, or it was 2 a matter of privacy, and I was looking at it in both 3 senses, and this particular reference on page 56 is 4 I took it to mean a reference to what I'd call old-style 5 confidentiality law, somebody who is breaching 6 a confidence which they owed to DC Horton.</b> 7 LORD JUSTICE LEVESON: But he's not suggested at all to you 8 or to anybody else that anybody has breached the 9 confidence. He's not said to you, "I got this material 10 from a source, I'm not going to tell you who", quite 11 rightly, I understand that, "but I actually got it from 12 a confidential source." 13 <b>A. Yes, he never talked to me about -- but a journalist 14 wouldn't necessarily talk to me about a confidential 15 source.</b> 16 LORD JUSTICE LEVESON: No, of course he wouldn't, but 17 presumably you read this statement -- 18 <b>A. Yes, I did.</b> 19 LORD JUSTICE LEVESON: -- to make sure that it wasn't 20 misleading. 21 <b>A. Yes. But I misread this then. If you feel that I was 22 somehow not putting all the facts on the table, then 23 I misread it because I took this to be a reference to 24 what I called sources in the old confidence style, 25 because that had been one of the arguments at the</b> Page 70</p>	<p>1 Q. Okay, the alternative may be he tells the truth and he's 2 prosecuted, but of course by 3 June you know he doesn't 3 have a public interest defence, so it's a serious 4 situation? 5 <b>A. Yes.</b> 6 Q. But by 1 or 2 June, you were still thinking he might 7 have a public interest defence? 8 <b>A. Yes.</b> 9 Q. Or the other alternative, I suppose, is, well, let's not 10 put Mr Foster in this position, we won't defend the 11 application for an injunction? 12 <b>A. That would have been a possibility, yes.</b> 13 Q. Only you feel, though, that in failing to engage with 14 what was a perfectly reasonable question, and you knew 15 that it was striking at a bull's eye, as it were, the 16 court was in danger of being misled? 17 <b>A. It was, I felt, entirely a matter for Olswang to put 18 this, and if you go to page 51, at the bottom of page 51 19 you'll see in the final paragraph: 20 "If this is the evidence of Mr Foster, we would 21 expect to see the matter dealt with expressly in his 22 witness statement." 23 Well, I told Patrick, and I can't remember where the 24 email is, but I said, "Don't get engaged on this issue, 25 you have done this legitimately now. Because you have</b> Page 72</p>

<p>1 <b>done this legitimately now, we don't have to engage on</b> 2 <b>that subject."</b></p> <p>3 Q. So you miss out the sentence before on page 51: 4 "We note in your letter of today's date you state 5 that the suggestion that Mr Foster accessed our client's 6 email account is baseless."</p> <p>7 <b>A. That's correct, yes.</b></p> <p>8 Q. We should look at precisely what you said on 2 June on 9 page 49. You do comment on the syntax of this sentence 10 in your witness statement.</p> <p>11 <b>A. That's correct, yes.</b></p> <p>12 Q. It's the last main paragraph on the page: 13 "As regards the suggestion that Mr Foster might have 14 accessed your client's email address because he has 15 a history of making unauthorised access into email 16 accounts, I regard this as a baseless allegation with 17 the sole purpose of prejudicing TNL's defence of this 18 action."</p> <p>19 So the history which you're referring to there is 20 the Oxford history rather than the more recent history, 21 is it?</p> <p>22 <b>A. Yes, it is.</b></p> <p>23 Q. It's still part of the history, isn't it?</p> <p>24 <b>A. No, because I go on to explain I've got Patrick in my</b> 25 <b>office at this stage and he then goes on to say he wrote</b> Page 73</p>	<p>1 <b>unauthorised access into email accounts", and I'm</b> 2 <b>referring to Oxford, and I go on to spell it all out in</b> 3 <b>the subsequent sentences. You can see it was not</b> 4 <b>investigated by the police. As soon as he'd identified</b> 5 <b>the failings, he handed over all evidence that he'd</b> 6 <b>obtained to the university and he admitted breaching</b> 7 <b>university regulations. The university accepted that</b> 8 <b>aspects of its IT network were not as secure as they</b> 9 <b>might have been. This is all -- you know, almost</b> 10 <b>dictated verbatim by Patrick to me.</b></p> <p>11 Q. I appreciate that, but it's clear from the emails of 12 3 June, when you were having exchanges with counsel, 13 that you well knew that Mr Foster had indeed hacked into 14 an email account at Oxford, didn't you?</p> <p>15 <b>A. Yes, I clearly knew that, yes.</b></p> <p>16 Q. So if one is to examine this textually, the allegation 17 that was being made by Olswangs, even if the allegation 18 is confined to Oxford, was not a baseless allegation, it 19 was a well-founded one, wasn't it?</p> <p>20 <b>A. I don't think I should have used the word "baseless",</b> 21 <b>with hindsight.</b></p> <p>22 Q. To add to it that if you include within the history 23 which is being referred to, the more recent history, 24 that was also well-founded, wasn't it?</p> <p>25 <b>A. He clearly had recently hacked, yes.</b> Page 75</p>
<p>1 <b>an article for one of the student newspapers at Oxford</b> 2 <b>exposing shortcomings in the university IT networks and</b> 3 <b>so on and so forth, and I go on and that's almost</b> 4 <b>directly out of Patrick's mouth I'm typing this into the</b> 5 <b>computer.</b></p> <p>6 LORD JUSTICE LEVESON: It's not entirely baseless because 7 actually he knew how to hack into somebody's email.</p> <p>8 <b>A. "Baseless" was not the best word to use.</b></p> <p>9 MR JAY: But even in relation to the Oxford issue, you were 10 aware that Mr Foster had hacked into an email account, 11 weren't you?</p> <p>12 <b>A. I knew he hacked into an email account, yes.</b></p> <p>13 Q. So the allegation that was being made or the suggestion 14 that was being made, even if one limits it to Oxford, it 15 was not a baseless allegation, was it? In fact it was 16 a well-founded allegation?</p> <p>17 <b>A. It's the use of the word "because he has a history of</b> 18 <b>making unauthorised access into email accounts"; that's</b> 19 <b>what Patrick said is just not true.</b></p> <p>20 Q. Because he'd only done it once?</p> <p>21 <b>A. That's what he told me.</b></p> <p>22 Q. But you're even denying that he'd done it once, aren't 23 you, in this letter?</p> <p>24 <b>A. I'm trying to deny, but I absolutely accept it's a very</b> 25 <b>badly formulated sentence, "history of making</b> Page 74</p>	<p>1 Q. We reach the position where, owing to a combination of 2 circumstances, including the persistence of Olswangs and 3 the need to give an accurate account to the court, the 4 court was not given an accurate account, was it?</p> <p>5 <b>A. I do not believe that this was relevant to the clear</b> 6 <b>legal issues of what went to David Eady and the issue as</b> 7 <b>to whether a blogger has a reasonable expectation of</b> 8 <b>privacy or not.</b></p> <p>9 Q. I understand that, Mr Brett, but why not fight the 10 injunction without putting any evidence in at all? If 11 it's a pure point of law, run it on the law.</p> <p>12 <b>A. We couldn't do that because, as happened on the Thursday</b> 13 <b>before Mr Justice Teare, we -- Jonathan Barnes was</b> 14 <b>trying to explain how you could identify DC Horton</b> 15 <b>through perfectly legitimate --</b></p> <p>16 LORD JUSTICE LEVESON: That's the point.</p> <p>17 MR JAY: That's the point, then.</p> <p>18 <b>A. Well --</b></p> <p>19 Q. You have to give some sort of account to the court to 20 avoid losing the case, it might be said, so therefore 21 let's not give an accurate account. That's what it 22 amounts to, isn't it?</p> <p>23 <b>A. Well, I'm so sorry, but that did not occur to me.</b> 24 <b>I believed that we could quite separate out the clean</b> 25 <b>issues of whether or not the law of privacy was going to</b> Page 76</p>

19 (Pages 73 to 76)

<p>1 <b>extend to protect bloggers, particularly where there was</b>  2 <b>a public interest in actually naming that particular</b>  3 <b>blogger.</b>  4 Q. What you could have done is just say to Olswangs and the  5 court, "Look, we're not going to engage with the facts,  6 we're just going to put in a skeleton argument and run  7 this point of law. You draw what inferences you like  8 from our failure to engage with the facts", and then see  9 what happens. You might still have won the case,  10 mightn't you?  11 <b>A. We might, but it still begs the question how on earth</b>  12 <b>you get to the point of saying DC Horton is NightJack.</b>  13 Q. Well, that --  14 <b>A. Patrick, by this stage, had also been able to see that</b>  15 <b>there had been a Facebook conversation between Patrick</b>  16 <b>and --</b>  17 LORD JUSTICE LEVESON: Well, you can do it a million ways  18 once you know. Just to expand, I'd just like to take  19 a minute out. Do not misunderstand, Mr Brett, I get no  20 pleasure from this, but the reason that it to my mind is  21 very important is that we have a highly reputable  22 periodical, newspaper, a highly reputable lawyer who has  23 been advising that newspaper for a very, very long time,  24 and there is a real issue about the closeness of that  25 relationship and the possibility that there is room for,</p> <p style="text-align: center;">Page 77</p>	<p>1 to be able to demonstrate that to the court's  2 satisfaction, didn't you?  3 <b>A. Yes, that became one of the issues at the hearing on the</b>  4 <b>28th, yes. It was quite clear that the court needed to</b>  5 <b>know that he could be identified from information in the</b>  6 <b>public domain.</b>  7 LORD JUSTICE LEVESON: But what the court was deciding was  8 that he was identified from publicly available  9 information. Not that he could be, but that it actually  10 had happened that way.  11 <b>A. Well, Hugh Tomlinson accepted that at the --</b>  12 LORD JUSTICE LEVESON: Of course he did because he's seen  13 the --  14 <b>A. Witness statement.</b>  15 LORD JUSTICE LEVESON: -- witness statement and therefore  16 he's not in a position to rebut the assertion that  17 that's what happened. That's what's really happening  18 here, isn't it? I mean, we'll turn to Mr Foster's  19 statement, I'm sure, in a moment.  20 <b>A. My Lord, all I can do is, rightly or wrongly, I had</b>  21 <b>believed that you could separate the earlier misconduct</b>  22 <b>by Mr Patrick Foster and you could then say, once he had</b>  23 <b>done this legitimately, that could be presented to the</b>  24 <b>court perfectly properly as he had done it legally.</b>  25 <b>Now, I accept that you say that the two inextricably</b></p> <p style="text-align: center;">Page 79</p>
<p>1 if you like, a blindness about the over-arching  2 interests involved, which impact upon the practices of  3 the press, that actually defending the point or raising  4 some interesting legal point becomes an over-arching  5 issue. That's why this point might be of value.  6 So I am not going to try and overexaggerate its  7 importance, but it raises the question about the extent  8 to which it is indicative of an issue that I do have to  9 think about. Do you understand the point?  10 <b>A. Yes, I do.</b>  11 LORD JUSTICE LEVESON: Yes.  12 MR JAY: In your thinking at the time, and indeed perhaps  13 your thinking even now, Mr Brett, if you look at  14 paragraph 48 of your statement, you were referring to  15 the transcript of the hearing of 28 May, that's the  16 Mr Justice Teare hearing:  17 "... the court needed to see a good deal more  18 evidence and hear further argument on the legal issues  19 before reaching a decision. As the hearing was at such  20 short notice, the Times had not had time to file  21 a skeleton argument or any witness statements before the  22 hearing. The court therefore needed to see how  23 NightJack's name could be deduced from publicly  24 available information."  25 So rightly or wrongly you did regard it as important</p> <p style="text-align: center;">Page 78</p>	<p>1 <b>intertwine, but that, if I may say so, is a subjective</b>  2 <b>judgment. I happen to take the view that you could</b>  3 <b>separate out the one from the other.</b>  4 LORD JUSTICE LEVESON: Let's just cease to be subjective,  5 shall we. Let's look at Mr Foster's statement. Mr Jay  6 has dealt with paragraph 9. Then he starts to set out  7 how he did it.  8 <b>A. Sorry, I don't have the right page.</b>  9 LORD JUSTICE LEVESON: JH3, page 56. To put the context of  10 the statement in, he's talking about the blog and he  11 says that he decided that one or two things had to be  12 true and that it was in the public interest to reveal  13 it, so there he is wanting to find out who is  14 responsible for NightJack. Then he talks about  15 paragraph 9, which Mr Jay has asked you about, and then  16 he goes on, "Only 24 hours to crack the case", which is  17 a citation from the blog.  18 Would you agree that the inference from this  19 statement is that this is how he went about doing it?  20 <b>A. Yes, it certainly does suggest --</b>  21 LORD JUSTICE LEVESON: And then he starts at paragraph 12:  22 "I began to systematically run the details of the  23 articles in the series through Factiva, a database of  24 newspaper articles collated from around the country.  25 I could not find any real life examples of the events</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 featured in part 1 of the series."  2 That suggests that's how he started and that's how  3 he's gone about it, doesn't it?  4 <b>A. It certainly suggests he has done precisely that, yes.</b>  5 LORD JUSTICE LEVESON: And that's how he's gone about it?  6 <b>A. Yes.</b>  7 LORD JUSTICE LEVESON: That's not accurate, is it? (Pause).  8 <b>A. It is not entirely accurate, no.</b>  9 LORD JUSTICE LEVESON: Paragraph 15. I'm sorry, Mr Jay,  10 I've started now. Paragraph 15:  11 "Because of the startling similarities between the  12 blog post and the case detailed in the newspaper report,  13 I began to work under the assumption" -- I began to work  14 under the assumption -- "that if the author was, as  15 claimed, a detective, they probably worked ..."  16 et cetera.  17 Same question: that simply isn't accurate, is it?  18 <b>A. My Lord, we're being fantastically precise.</b>  19 LORD JUSTICE LEVESON: Oh, I am being precise because this  20 is a statement being submitted to a court, Mr Brett.  21 <b>A. Yes.</b>  22 LORD JUSTICE LEVESON: Would you not want me to be precise?  23 <b>A. No, of course I'd want you to be precise. It's not the</b>  24 <b>full story.</b>  25 LORD JUSTICE LEVESON: Paragraph 20. I repeat, I'm not</p> <p style="text-align: center;">Page 81</p>	<p>1 statement said, "I started out by unlawfully hacking  2 into DC Horton's email, so I knew who he was. I was  3 then told that I had to do it legitimately, and this is  4 what I did", and then he goes through everything we see  5 in the witness statement, although he would have had to  6 have phrased the witness statement rather differently if  7 that was the true version, which it was. Do you think  8 that the outcome might have been different, had the  9 witness statement given the true, full version?  10 <b>A. Patrick Foster might have been prosecuted. David Eady's</b>  11 <b>analysis of the legal issues should have remained</b>  12 <b>exactly the same, as it turned out --</b>  13 LORD JUSTICE LEVESON: Well, you won on the first issue and  14 you also won on the second issue as an alternative.  15 <b>A. Yes.</b>  16 LORD JUSTICE LEVESON: You might not have won on the second  17 issue had he known the truth.  18 <b>A. I think it still would have been in the public interest.</b>  19 <b>I mean, David Eady made it perfectly clear that he</b>  20 <b>thought that a police officer who was breaching police</b>  21 <b>regulations should be named.</b>  22 LORD JUSTICE LEVESON: Yes, but he had to balance then the  23 way in which you'd got the story.  24 <b>A. That is correct, yes.</b>  25 MR JAY: Your witness statement --</p> <p style="text-align: center;">Page 83</p>
<p>1 enjoying this:  2 "At this stage I felt sure that the blog was written  3 by a real police officer."  4 That is actually misleading, isn't it?  5 <b>A. It certainly doesn't give the full story.</b>  6 LORD JUSTICE LEVESON: Well, there are two or three other  7 examples, but I've had enough.  8 MR JAY: Were you fearful, Mr Brett, that had the court been  9 given the full story, the outcome might have been  10 different?  11 <b>A. No, because, as I keep on saying, he'd done it</b>  12 <b>legitimately.</b>  13 Q. I think there are problems with that answer now,  14 Mr Brett, because in order to demonstrate that  15 proposition, he has to put forward an account in his  16 witness statement which is not a full and frank account,  17 to put it at its lowest; isn't that correct?  18 <b>A. He has certainly skirted the issues. As I'd said to</b>  19 <b>Patrick, "Don't engage with the other side." The other</b>  20 <b>side had been saying, "We suspect that he has accessed</b>  21 <b>our client's computer."</b>  22 Q. Yes.  23 <b>A. I told him, "Don't engage on that, just keep it simple,</b>  24 <b>say how you did it legitimately."</b>  25 Q. May I spell it out in these terms: suppose the witness</p> <p style="text-align: center;">Page 82</p>	<p>1 <b>A. But can I just say that you could -- I mean, that was</b>  2 <b>the balancing exercise and he had got it legitimately.</b>  3 MR JAY: We keep on coming back to that.  4 Your analysis in your witness statement to us at  5 paragraph 48, which I've already drawn attention to,  6 following the hearing before Mr Justice Teare, you felt  7 that the court needed to see how NightJack's name could  8 be deduced from publicly available information, so you  9 were making a strategic judgment in the litigation that  10 the version which says "I did it legitimately" had to be  11 placed before the court. That's right, isn't it?  12 <b>A. That's right, yes.</b>  13 Q. Because you might have taken the view, but clearly you  14 didn't: we'll go before the court without any evidence  15 at all, mightn't you?  16 <b>A. That was clearly not going to work, because the Teare</b>  17 <b>hearing, Mr Justice Teare was obviously of the view that</b>  18 <b>there was a breach of confidence of some kind.</b>  19 Q. In fact it would have worked in front of  20 Mr Justice Eady, although there might have been  21 a judicial explosion, but you're probably right, it  22 might not have worked in front of Mr Justice Teare, it  23 does depend a bit on the judge you draw.  24 LORD JUSTICE LEVESON: The other possibility is that the  25 statement says, "I am not prepared to say how I learnt</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 DC Horton's name, but this information is available on 2 an entirely legitimate basis in this way", bom, bom, 3 bom, bom, bom. 4 <b>A. That's right.</b> 5 LORD JUSTICE LEVESON: That would at least have the benefit 6 of being frank. 7 <b>A. My Lord, I can do nothing other than say, with hindsight 8 and expert advice -- I mean, I will readily admit 9 I think I should have gone to -- now, with hindsight, 10 I should have gone and got a second opinion from another 11 barrister, someone senior and as well equipped to advise 12 me, as Antony was, and I should have done that.</b> 13 LORD JUSTICE LEVESON: But you could have gone to him. 14 MR JAY: He was your barrister. 15 <b>A. I know, but I didn't want to put him -- I felt I'd been 16 put into this invidious situation. A journalist had 17 come and told me he'd done something wrong, he'd done 18 something clearly which I thought was illegal. Then 19 I have a duty to the newspaper and then I have a duty 20 not to mislead the court, and I thought the journalist 21 had put me into a crashingly difficult situation of 22 duties and obligations and everything else.</b> 23 Q. Even more reason, Mr Brett, to go to Mr White and ask 24 him for the answer. 25 <b>A. That was --</b></p> <p style="text-align: center;">Page 85</p>	<p>1 <b>think DC Horton would take the case to court, but he 2 did, I got that wrong. Other than that, no.</b> 3 LORD JUSTICE LEVESON: Actually, doesn't that make it worse? 4 I'll tell you why I ask that question. 5 <b>A. Mm.</b> 6 LORD JUSTICE LEVESON: Because many people couldn't afford 7 to take this sort of thing to law, and therefore what 8 the press have done, what the Times had done, using an 9 illegal mechanism, had exposed some wrong on the basis 10 that actually the person who was being wronged would not 11 seek redress, would not try, and doesn't that mean that 12 you are justifying any route you wish to take to get 13 a story, provided in the end it's true? 14 <b>A. My Lord, I am certainly not, and I don't believe I ever 15 have adopted a "the end justifies the means" approach. 16 I would always obviously look at whether or not there 17 was a public interest in a story which had been obtained 18 either in breach of confidence or some other way. 19 I mean the number of times over the years where I have 20 actually been shown a copy of a government report which 21 we'd got hold of the day before it's due to come out and 22 it's been published in the public interest, then there's 23 a huge complaint from the department of whatever it is 24 because we got it early, et cetera. There are endless 25 occasions when in a newspaper you will be confronted</b></p> <p style="text-align: center;">Page 87</p>
<p>1 Q. Because he was the barrister actually in your case. It 2 wasn't as if you had to trouble him -- 3 LORD JUSTICE LEVESON: And then if he says, "Well, you have 4 to -- you can't do it on this basis, very sorry", then 5 you can either do one of two things. You can either 6 say, "Thank you very much, I will accept your advice, we 7 will do whatever we're going to do in the way we're 8 doing to do it", or alternatively, "Thank you very much, 9 I feel I have an over-arching duty to my client, to the 10 journalist. I think we'll go to some other silk to 11 argue this case, we won't tell him". And then you've 12 made a decision. A very difficult decision, a very 13 unhappy decision, and not, I think, one that you would 14 have made, but there it is. 15 <b>A. My Lord, I -- all of what you've just said I could have 16 done. I wish I had done.</b> 17 LORD JUSTICE LEVESON: I'm sure that's right. 18 MR JAY: When exploring the possible reasons for what 19 happened here, it's difficult to speculate, but does it 20 have anything to do, Mr Brett, with the fact that you 21 had been an in-house lawyer for, by then, the best part 22 of 32 years? 23 <b>A. No, other than the fact that I thought I knew the 24 precise legal issues of the law of confidence and 25 privacy reasonably well and I took a view that I didn't</b></p> <p style="text-align: center;">Page 86</p>	<p>1 <b>with a public interest decision. This was one of those 2 cases where I believed it was in the public interest 3 that DC Horton should be named, because he was misusing 4 police information.</b> 5 <b>When Patrick Foster had done it, I thought properly, 6 and I totally accept your views that you can't separate 7 out the two, but I took the view that you could separate 8 out the two, that was probably my mistake, but it was an 9 innocent mistake, and I had made it absolutely -- 10 I mean, if we go to the end of this bundle, you'll see 11 the letter of discipline which goes to Patrick Foster, 12 which I called for. I mean, I had said to -- you know, 13 this is something we cannot -- you're trying to probe me 14 as to whether I'm somehow condoning what Patrick had 15 done. I wouldn't dream of doing that.</b> 16 LORD JUSTICE LEVESON: No, I'm not suggesting you're 17 condoning what Mr Foster had done at all. 18 <b>A. No.</b> 19 LORD JUSTICE LEVESON: I am sure you did not condone what 20 he'd done. What I'm actually probing is how the 21 relationship between the in-house lawyer acting for 22 a newspaper and conscious of the different way stories 23 can emerge, this, as you knew, through an illegal hack, 24 then manifests itself in your being open and frank with 25 everybody. It goes back to the question which I've</p> <p style="text-align: center;">Page 88</p>

<p>1 already used today. The press rightly hold all of us to 2 account; who is holding the press to account? 3 <b>A. That is precisely what your Inquiry is looking into.</b> 4 LORD JUSTICE LEVESON: That's the point. 5 <b>A. I know.</b> 6 LORD JUSTICE LEVESON: That's why this issue has achieved 7 a significance -- 8 <b>A. Yes.</b> 9 LORD JUSTICE LEVESON: -- which, on the face of the story 10 itself, it may not actually have, but which, as 11 indicative of an issue, it most certainly does have. 12 <b>A. I can totally understand that. I can say nothing more 13 than in 33 years that I was at the Times, this was the 14 one and only case I had. And God, I wish I could have 15 done without it.</b> 16 LORD JUSTICE LEVESON: Yes. 17 <b>A. I would have done anything. And I mean, if you'd been 18 in the room with Patrick Foster and me and what I said 19 to him, I mean the air was blue.</b> 20 LORD JUSTICE LEVESON: I have no doubt about that. I quite 21 understand. But equally, you understand why I'm 22 concerned about it. 23 <b>A. Of course I do.</b> 24 MR JAY: I think that's as far as I need go. 25 LORD JUSTICE LEVESON: Well, I think we've done that.</p> <p style="text-align: center;">Page 89</p>	
<p>1 Maybe now is not the time, but I am interested in 2 early resolution, for reasons which you've probably read 3 about? 4 <b>A. Yes.</b> 5 LORD JUSTICE LEVESON: And I've said it often enough. And 6 I'm keen to see ways, as you well know, of finding 7 approaches through issues such as privacy, confidence, 8 libel, which can be accessed without the cost of 9 proceedings, and therefore I have received Sir Charles' 10 submission and it may we'll be that we will come back to 11 re-examine these matters on another occasion. 12 <b>A. I would be delighted to help in any way I can. I did it 13 for a number of years at the Times when we did precisely 14 that. We offered fast-track arbitration of meaning and 15 other issues, and I had at least up to a dozen cases 16 where we did just that. We dealt with meaning or 17 another discrete issue very quickly and very easily.</b> 18 LORD JUSTICE LEVESON: It's obviously a very important part 19 of what I have to do. Thank you very much, Mr Brett. 20 Right. Is that Monday? 21 MR JAY: It is Monday, yes. 22 LORD JUSTICE LEVESON: Very good. Thank you very much. 23 (4.28 pm) 24 (The hearing adjourned until 10 o'clock 25 on Monday, 19 March 2012)</p> <p style="text-align: center;">Page 90</p>	

<b>A</b>	<b>advantage</b> 51:1	32:25	69:11	<b>baseless</b> 73:6,16	<b>breach</b> 43:23	<b>careful</b> 49:8 61:8
<b>able</b> 4:2,5 12:16	<b>advice</b> 2:16 42:5	<b>appearing</b> 4:22	<b>assuming</b> 48:14	74:6,8,15	48:21 84:18	<b>carefully</b> 8:9
51:13 52:6,7	42:13,20 43:3	<b>appears</b> 23:4	<b>assumption</b>	75:18,20	87:18	18:6,9 38:16
77:14 79:1	43:4,10,20	<b>appeasement</b>	81:13,14	<b>basically</b> 60:13	<b>breached</b> 48:16	<b>carry</b> 49:12
<b>absolutely</b> 12:14	44:3 45:13,16	27:20	<b>attach</b> 43:21	64:24	70:8	<b>carrying</b> 36:10
22:11 30:9	45:17 58:12	<b>application</b> 57:6	<b>attached</b> 22:3	<b>basis</b> 14:20 15:3	<b>breaching</b> 70:5	56:20
33:7 36:2	63:5 64:24	58:17 72:11	<b>attacks</b> 26:20	15:20 34:20	75:6 83:20	<b>case</b> 1:17,20 2:11
38:11 39:24	66:20 71:24	<b>applied</b> 45:18	27:14	63:14 85:2	<b>break</b> 40:7	2:13,15 3:7,17
53:10 57:1	85:8 86:6	<b>appointed</b> 26:10	<b>attention</b> 84:5	86:4 87:9	<b>breakfast</b> 19:19	3:19 4:1,2,2,8
58:1 68:22	<b>advise</b> 4:3 14:1	<b>appreciate</b> 37:24	<b>Attorney</b> 27:19	<b>bearing</b> 44:8	<b>breakthrough</b>	10:2,12 11:5
74:24 88:9	71:13 85:11	75:11	<b>attracted</b> 27:1	<b>beautiful</b> 51:24	11:5,6	13:13,21 17:7
<b>abused</b> 35:13	<b>advised</b> 71:15	<b>approach</b> 4:2	<b>attracts</b> 42:13	<b>began</b> 61:1 80:22	<b>Brett</b> 40:4,10,12	17:13 19:1
<b>AC</b> 29:18,18	<b>advising</b> 2:5	87:15	<b>attributes</b> 52:2	81:13,13	40:15 41:20	24:22 25:2
<b>accelerate</b> 3:13	14:10 43:19,21	<b>approached</b> 7:16	<b>author</b> 81:14	<b>beginning</b> 46:3	49:6 50:21	27:16,18 37:9
<b>accept</b> 32:20,22	77:23	43:10 53:5	<b>authorities</b> 18:24	<b>begs</b> 77:11	52:14 59:22	37:17 47:24
74:24 79:25	<b>affairs</b> 32:12	56:4,16	<b>available</b> 49:25	<b>behave</b> 48:2	65:16 76:9	60:6 62:21,23
86:6 88:6	<b>afford</b> 87:6	<b>approaches</b> 56:8	50:12,24 51:4	<b>behaviour</b> 61:18	77:19 78:13	63:2 64:11
<b>acceptable</b> 48:22	<b>afraid</b> 4:16 46:18	90:7	53:19 78:24	<b>believe</b> 15:8,22	81:20 82:8,14	69:21 76:20
<b>accepted</b> 5:8	65:16	<b>appropriate</b>	79:8 84:8 85:1	25:5,14 33:19	85:23 86:20	77:9 80:16
75:7 79:11	<b>agenda</b> 27:2	36:12,13 50:8	<b>avoid</b> 25:15	34:2 53:4 56:5	90:19	81:12 86:1,11
<b>access</b> 20:1 44:17	32:14 33:3	52:16	76:20	58:13 62:9,23	<b>Brick</b> 48:17 65:4	87:1 89:14
71:9 73:15	<b>agree</b> 17:3 49:3	<b>arbitration</b>	<b>aware</b> 13:12,17	76:5 87:14	<b>brief</b> 27:25 28:4	<b>cases</b> 8:17 52:7
74:18 75:1	51:9 80:18	90:14	13:21 21:8	<b>believed</b> 59:16	<b>briefing</b> 27:6	88:2 90:15
<b>accessed</b> 73:5,14	<b>agreed</b> 58:24	<b>architect</b> 26:24	28:4 29:3,7,13	60:14,15,15	28:11 29:16,17	<b>catch</b> 24:13
82:20 90:8	60:19	<b>area</b> 41:3 45:3	30:13 31:21	62:15,23 63:17	32:25	<b>causal</b> 22:6
<b>accessing</b> 48:20	<b>air</b> 89:19	<b>argue</b> 8:16 47:6	45:2 48:18	76:24 79:21	<b>briefings</b> 27:8	<b>cause</b> 7:7 14:7
63:23	<b>alarm</b> 44:22 47:9	86:11	62:6 67:1	88:2	28:5	<b>caused</b> 7:4 9:1
<b>account</b> 11:14	<b>Alastair</b> 40:12	<b>argument</b> 48:8	74:10	<b>bells</b> 44:22 47:9	<b>bring</b> 3:12	11:25 53:6
14:10 39:21,23	40:15 41:22	68:12 77:6	<b>B</b>	<b>benefit</b> 24:1 85:5	<b>bringing</b> 3:14	<b>cease</b> 80:4
44:18 53:1	42:19 46:20	78:18,21	<b>B</b> 62:21	<b>best</b> 11:2 23:10	52:20	<b>certain</b> 5:19
58:19 59:7,23	56:10	<b>arguments</b> 64:4	<b>back</b> 5:25 9:11	25:18 74:8	<b>broadly</b> 6:3	25:16 53:1
61:11 62:18	<b>Ali</b> 18:16	70:25	9:12 10:1 13:8	86:21	19:11	64:8
64:14,20 65:20	<b>allegation</b> 50:3	<b>arises</b> 66:22	14:6 17:20	<b>better</b> 8:13 21:19	<b>broke</b> 8:14 17:8	<b>certainly</b> 11:23
68:1 71:9 73:6	73:16 74:13,15	71:10	22:25 24:19	34:13 64:11	<b>brought</b> 29:14	22:14 23:1
74:10,12 75:14	74:16 75:16,17	<b>arising</b> 61:10	41:7 64:16	<b>beyond</b> 5:10	34:11	51:19 56:4
76:3,4,19,21	75:18	<b>arrest</b> 32:9,10,19	84:3 88:25	<b>big</b> 8:15	<b>bugged</b> 27:18	59:21 60:14,15
82:15,16 89:2	<b>Allen</b> 50:13	<b>article</b> 4:15 5:2,3	90:10	<b>bit</b> 5:13 48:25	<b>build</b> 26:18	61:25 63:13
89:2	<b>alternative</b> 69:22	5:5 6:2,9,25	<b>background</b> 2:4	50:21 84:23	<b>building</b> 23:12	68:8 80:20
<b>accounts</b> 49:2	72:1,9 83:14	7:3 37:8 74:1	2:13,14,17	<b>bits</b> 52:1	<b>bull's</b> 72:15	81:4 82:5,18
73:16 74:18	<b>alternatively</b>	<b>articles</b> 25:8 26:4	46:5 63:10	<b>black</b> 9:20	<b>bundle</b> 88:10	87:14 89:11
75:1	86:8	32:8 80:23,24	<b>badly</b> 74:25	<b>Blackmore</b>	<b>Bureau</b> 6:8	<b>cetera</b> 32:19
<b>accurate</b> 76:3,4	<b>amounts</b> 58:7	<b>ascertain</b> 51:4	<b>balance</b> 35:16,16	54:17	<b>bureaucracy</b>	81:16 87:24
76:21 81:7,8	76:22	<b>ascertained</b> 71:6	36:1,2 83:22	<b>Blair</b> 23:13,20	35:7	<b>chain</b> 45:24 56:6
81:17	<b>analysis</b> 44:2	<b>ascertaining</b>	<b>balanced</b> 9:16	24:18 26:1,6	<b>bureaucratic</b>	56:17
<b>accused</b> 15:11	58:22,25 68:25	51:13 53:18	10:9	27:4,6	35:6	<b>Chairman</b> 30:10
<b>achieve</b> 59:12	83:11 84:4	56:17	<b>balancing</b> 84:2	<b>blind</b> 50:25	<b>C</b>	<b>challenges</b> 18:24
<b>achieved</b> 36:3	<b>annual</b> 1:11	<b>aside</b> 28:24 30:2	<b>ban</b> 34:8,23	<b>blindness</b> 78:1	<b>C</b> 62:21	<b>challenging</b> 19:4
89:6	<b>anonymity</b> 55:11	<b>asked</b> 25:3 39:22	<b>banned</b> 34:22	<b>blog</b> 44:15 52:7	<b>caff</b> 22:23	<b>chambers</b> 45:13
<b>achieving</b> 3:14	<b>answer</b> 29:2,8	41:9 55:1	<b>banning</b> 34:11	60:17 80:10,17	<b>call</b> 5:19 6:5,7,8	<b>chance</b> 34:22
<b>acquit</b> 37:3	50:23 51:1,15	71:24 80:15	<b>bar</b> 29:20,21,24	81:12 82:2	6:13 31:17,20	<b>change</b> 1:21 34:1
<b>act</b> 35:8,10 45:4	52:12 54:3	<b>asking</b> 9:2 29:11	29:24	<b>blogger</b> 47:7	57:2,11 70:4	36:8,8
45:11 48:13,19	56:23 82:13	29:12 65:2,16	<b>Barnes</b> 65:15,18	76:7 77:3	<b>called</b> 18:12 25:1	<b>changed</b> 16:7
62:7 66:23	85:24	<b>asks</b> 44:4	65:19 66:4,17	<b>bloggers</b> 55:11	25:7 50:4	<b>Chappell</b> 49:9
<b>acting</b> 14:20 15:1	<b>Antony</b> 63:13	<b>aspects</b> 2:2 3:8	66:20 67:5	77:1	56:15 70:24	58:3 61:10,25
15:3,20 16:22	66:10,10 67:7	75:8	76:13	<b>blue</b> 89:19	88:12	<b>chap's</b> 47:18
17:25 88:21	67:13,14 85:12	<b>assertion</b> 79:16	<b>barrister</b> 45:6	<b>board</b> 28:8,25	<b>calls</b> 5:19	<b>characteristics</b>
<b>action</b> 73:18	<b>anybody</b> 4:23	<b>assessment</b> 48:6	48:17 65:3,3	29:10,17	<b>Cambridgeshire</b>	52:2,4
<b>add</b> 6:4 18:10	70:8,8	<b>assistant</b> 28:17	85:11,14 86:1	<b>body</b> 39:13	17:25	<b>charge</b> 46:6
39:7 75:22	<b>anyway</b> 7:1 34:6	30:6,6	<b>Barrow</b> 41:15,16	<b>bom</b> 85:2,2,3,3,3	<b>campaign</b> 17:9	<b>charges</b> 13:14
<b>address</b> 71:13	51:15 54:4	<b>Associated's</b>	41:18 46:1,12	<b>book</b> 26:3 45:6	<b>camps</b> 29:7	<b>Charles</b> 41:6
73:14	60:3	23:8	52:22 54:17,25	69:6	<b>cancelled</b> 23:16	90:9
<b>adjourned</b> 90:24	<b>Apart</b> 19:24	<b>Association</b> 1:5	55:5 56:15	<b>bother</b> 67:12	<b>career</b> 18:8	<b>chasing</b> 51:23
<b>admission</b> 63:1	<b>apologise</b> 24:25	1:11	57:8,16,23	<b>bottom</b> 64:2	26:21 34:16	<b>chat</b> 23:16
<b>admit</b> 85:8	<b>apologised</b> 46:17	<b>assorted</b> 30:19	60:14	72:18	40:20	<b>check</b> 31:15
<b>admitted</b> 75:6	<b>apparently</b> 61:4	<b>assume</b> 28:21	<b>based</b> 16:12	<b>bought</b> 30:7	<b>careers</b> 35:14	<b>checking</b> 16:13
<b>adopted</b> 87:15	<b>appeared</b> 4:12	<b>assumed</b> 46:13		<b>boy</b> 65:11 66:2		<b>Chief</b> 17:25



<b>choose</b> 4:25	42:18 56:7	<b>confidences</b>	<b>corner</b> 22:23	<b>credibility</b> 14:16	<b>December</b> 23:17	<b>dictated</b> 75:10
<b>chooses</b> 33:6	58:7 84:3	19:24	<b>correct</b> 6:3 13:11	<b>crime</b> 2:2 16:16	<b>decide</b> 16:9 33:2	<b>different</b> 3:8
<b>choosing</b> 51:23	<b>Commander</b>	<b>confidential</b>	19:14 21:6	47:1	37:10 59:24	6:18 9:19
<b>chronology</b>	18:16	26:16 34:20	26:8 30:25	<b>criminal</b> 14:7	<b>decided</b> 80:11	12:17 21:9
53:13	<b>commence</b> 53:9	42:12 44:14	36:16 40:25	44:25 45:2	<b>deciding</b> 79:7	35:20 37:20
<b>circumstances</b>	<b>comment</b> 8:13	46:16 68:18,20	41:1 44:2,19	48:22,25 49:17	<b>decision</b> 2:6	38:20 82:10
47:23 58:18	25:23,25 31:19	68:24 69:1,13	44:20 49:15,21	63:1 65:5	10:18 36:6	83:8 88:22
60:25 63:12	73:9	69:16,17 70:12	50:10,15 54:2	<b>criticism</b> 9:11,12	37:10 63:15	<b>differently</b> 83:6
76:2	<b>commentators</b>	70:14	54:10,14 55:6	26:6	78:19 86:12,12	<b>difficult</b> 8:19
<b>citation</b> 80:17	24:3	<b>confidentiality</b>	55:12,22 58:9	<b>cross</b> 46:19 58:3	86:13 88:1	18:22 36:7,7
<b>civil</b> 28:14,21	<b>commissioned</b>	41:21 70:5	59:2 63:24,25	<b>cuff</b> 45:17	<b>decisions</b> 10:9	36:22 37:22
<b>claim</b> 29:14	69:5	<b>confidentially</b>	66:25 67:4,25	<b>cup</b> 19:19	<b>decision-making</b>	42:22 43:24
<b>claimant's</b> 30:23	<b>Commissioner</b>	42:20	68:5,25 71:15	<b>current</b> 5:17	32:21	44:1,7 47:8
<b>claimed</b> 81:15	23:2 26:7,10	<b>confined</b> 75:18	73:7,11 82:17	33:19 43:8	<b>declined</b> 31:18	51:9 85:21
<b>clarification</b>	27:11 28:18	<b>confirmed</b> 71:8	83:24		<b>deduced</b> 78:23	86:12,19
33:20	30:3,3	<b>confronted</b>	<b>correctly</b> 21:23	<b>D</b>	84:8	<b>difficulty</b> 35:4
<b>clarifying</b> 66:16	<b>commissioners</b>	87:25	42:14 49:14	<b>Dacre</b> 2:5 23:4	<b>defamatory</b>	60:2 66:7 67:2
<b>clean</b> 76:24	30:6,7	<b>connection</b> 8:5	60:10	<b>Daily</b> 19:3 23:12	30:24	<b>dig</b> 34:19
<b>clear</b> 47:21 53:4	<b>committed</b> 44:25	<b>conscious</b> 21:14	<b>corresponding</b>	23:19 24:16	<b>defence</b> 45:7,8	<b>dilemma</b> 42:17
54:12 59:4	49:17 63:1	29:4 38:22	52:4	27:2 31:25	45:10,20 46:25	42:22
65:15,19 75:11	<b>company</b> 42:25	88:22	<b>corruption</b> 18:22	32:16 33:5	47:11,16,22	<b>diminish</b> 14:22
76:5 79:4	47:18	<b>Conservative</b>	35:20	<b>Damian</b> 32:9,10	48:13,23,25	14:24
83:19	<b>compartment</b>	32:15,17	<b>cosmetic</b> 51:12	32:15	61:16,17 62:8	<b>dinner</b> 19:15,20
<b>clearly</b> 11:20	63:17	<b>consider</b> 39:10	51:16	<b>danger</b> 14:18	66:24 72:3,7	20:20 21:10
32:23 43:18	<b>compartmenta...</b>	42:9	<b>cost</b> 90:8	72:16	73:17	22:2 30:8
46:5 48:19,21	63:15	<b>consideration</b>	<b>counsel</b> 64:3	<b>Data</b> 45:3	<b>defend</b> 72:10	<b>direct</b> 46:10
48:21,22 52:8	<b>compiled</b> 71:1	7:17 11:9 49:8	75:12	<b>database</b> 80:23	<b>defendant</b> 59:1	<b>direction</b> 43:1
69:6 75:15,25	<b>complained</b> 17:9	49:19 60:24	<b>counsel's</b> 63:5	<b>date</b> 73:4	<b>defending</b> 58:17	<b>directly</b> 46:9,12
84:13,16 85:18	<b>complaint</b> 87:23	61:8,24	<b>counter</b> 29:17	<b>dated</b> 40:17	78:3	74:4
<b>client</b> 42:16,17	<b>complete</b> 22:10	<b>considered</b> 10:12	<b>country</b> 80:24	68:10	<b>degree</b> 19:16	<b>disagree</b> 6:25 7:2
43:20 71:7,10	35:22	18:5 39:12	<b>couple</b> 18:5	<b>David</b> 49:9 50:13	35:18	13:2 15:5
86:9	<b>completely</b> 22:11	<b>considering</b> 34:3	28:10 36:4	58:3 61:10,25	<b>delegated</b> 54:16	<b>disappointed</b>
<b>client's</b> 73:5,14	22:14 34:21	<b>consistent</b> 26:1	55:3 64:19	76:6 83:10,19	<b>delegates</b> 58:8	20:13 31:8
82:21	57:13	<b>Constable</b> 17:25	<b>course</b> 10:5	<b>day</b> 4:9,20 5:4	<b>delicate</b> 14:8	<b>disciplinary</b>
<b>climate</b> 5:17	<b>computer</b> 45:11	<b>contact</b> 34:9,11	16:23 21:3,22	15:6 18:10	<b>delicately</b> 18:25	45:22 49:20
33:19	47:18 48:13,18	35:17	22:5,5,8 30:18	24:5 25:10,15	<b>delighted</b> 90:12	60:21
<b>close</b> 17:13 29:18	48:20 62:7	<b>contacted</b> 13:12	37:24 39:24	26:16 54:24	<b>demanding</b> 5:20	<b>discipline</b> 88:11
<b>closely</b> 30:12	63:23 65:1	<b>contemporary</b>	40:23 42:21	57:18 87:21	<b>demonstrate</b>	<b>disciplined</b> 60:14
<b>closeness</b> 34:4	66:23 74:5	55:10	51:24 58:17	<b>days</b> 2:8 18:5	51:19 79:1	<b>disclosures</b>
77:24	82:21	<b>context</b> 20:17	67:23 70:16	55:3,16 68:11	82:14	15:21 25:19
<b>club</b> 52:6,10	<b>concentrating</b>	41:13,20 80:9	72:2 79:12	<b>DC</b> 44:13 50:3	<b>denial</b> 33:25	<b>discrete</b> 90:17
56:12	61:14 62:14	<b>continuation</b>	81:23 89:23	52:9,10 53:22	<b>deny</b> 53:23 74:24	<b>discrimination</b>
<b>code</b> 53:14,16,21	<b>concern</b> 7:4	64:9 66:8	<b>court</b> 13:15	53:23 54:3	<b>denying</b> 74:22	28:18
<b>coffee</b> 19:19 20:6	35:13 46:24	<b>continues</b> 7:19	41:24 48:17	55:19 56:5,9	<b>department</b> 5:20	<b>discuss</b> 25:18
<b>coincidence</b>	68:10	<b>contrary</b> 54:11	53:2,12 59:1,5	56:24 61:11	46:10 87:23	<b>discussed</b> 4:21
25:12,13,13	<b>concerned</b> 5:16	<b>control</b> 8:19	59:7,23,23,24	64:14,20 65:20	<b>depend</b> 84:23	26:16 65:4
<b>collated</b> 80:24	18:2,3,3 19:2	46:11,11,13	60:5 62:3,11	66:5,11 67:3	<b>depending</b> 63:2	<b>discussing</b> 30:16
<b>colleague</b> 19:6	34:8,10 36:9	<b>Controlling</b>	62:12,19 63:12	67:22,24 68:3	<b>deputy</b> 4:3 30:3	46:9
<b>colleagues</b> 5:17	89:22	35:15	65:4 68:1	68:22 69:6	30:6 54:17	<b>discussion</b> 38:4
5:18 32:11	<b>concerning</b> 5:21	<b>controversies</b>	72:16 76:3,4	70:6 76:14	<b>derived</b> 31:5	43:6 57:25
39:22	71:7	26:25 27:22	76:19 77:5	77:12 83:2	<b>describe</b> 2:12	<b>discussions</b>
<b>combination</b>	<b>concerns</b> 24:19	<b>controversy</b>	78:17,22 79:4	85:1 87:1 88:3	<b>describing</b> 50:15	15:17 24:21
76:1	26:13	27:16	79:7,24 81:20	<b>dead</b> 52:21 60:8	<b>designed</b> 4:23	<b>disharmony</b>
<b>combine</b> 39:3	<b>condone</b> 88:19	<b>conundrum</b>	82:8 84:7,11	62:10	<b>desperate</b> 20:12	28:20
<b>come</b> 4:7 5:25	<b>condoning</b> 88:14	44:11	84:14 85:20	<b>deal</b> 18:14,15,22	<b>detail</b> 5:23 19:12	<b>divisions</b> 29:15
6:21 8:20 18:2	88:17	<b>conversation</b>	87:1	19:11 34:20	23:19 31:11	<b>Dizaei</b> 18:16
30:15 32:25	<b>conduct</b> 47:9	41:19 44:5	<b>courts</b> 58:19	41:9 43:5	<b>detailed</b> 81:12	27:21
33:24 36:6	<b>conference</b> 1:11	45:15 46:3	<b>court's</b> 79:1	45:22 67:8	<b>details</b> 1:13 3:9	<b>DNA</b> 11:4
38:18 39:9	18:1	48:17 49:11	<b>covered</b> 17:7	78:17	19:4 80:22	<b>document</b> 24:1
41:7 46:1,10	<b>confidence</b> 22:10	53:23 55:4,7	43:11 45:9	<b>dealing</b> 1:6 10:9	<b>detective</b> 81:15	<b>doing</b> 20:24
46:11 47:17	41:22 58:15	60:1 67:10,15	<b>cowardice</b> 19:7	24:20 32:12	<b>determination</b>	27:23 35:11
53:7 71:23	60:7,20 62:2,9	77:15	<b>CRA</b> 5:18	35:19	3:12	36:24 37:18,20
85:17 87:21	69:22,24 70:1	<b>convicted</b> 18:21	<b>crack</b> 40:4 80:16	<b>dealt</b> 23:24 27:14	<b>developing</b> 19:13	47:11 48:4
90:10	70:6,9,24	<b>copy</b> 67:7 87:20	<b>cracked</b> 53:14,15	35:9 72:21	<b>developments</b>	62:14 80:19
<b>comes</b> 20:16 43:3	84:18 86:24	<b>copying</b> 67:12	<b>cracking</b> 53:21	80:6 90:16	8:18 13:13	86:8 88:15
<b>coming</b> 26:22	87:18 90:7	<b>core</b> 12:11	<b>crashingly</b> 85:21	<b>death</b> 8:5	<b>dialogue</b> 37:12	<b>domain</b> 3:13

28:1,25 48:4 50:8,18 56:20 60:4 69:2 79:6 <b>double</b> 1:6,17 <b>doubt</b> 7:21 8:1,8 17:19 25:15 30:15 46:23 89:20 <b>doubted</b> 17:15 <b>downfall</b> 26:25 <b>downstairs</b> 47:20 <b>dozen</b> 90:15 <b>DPA</b> 65:4 <b>DPP</b> 13:15 <b>draconian</b> 34:11 <b>draw</b> 29:8 77:7 84:23 <b>drawn</b> 84:5 <b>dream</b> 88:15 <b>drink</b> 19:20 47:7 <b>drinks</b> 23:17 30:8 <b>Driscoll</b> 4:14 6:24 8:12 11:17 13:8 37:14 <b>Driscoll's</b> 4:19 6:20 8:8 <b>driving</b> 12:4 33:23 <b>dry</b> 58:16 <b>due</b> 21:3,22 22:7 87:21 <b>duties</b> 41:24,25 85:22 <b>duty</b> 28:16 41:21 41:23 42:24 43:23 54:19 58:10 59:1 60:7,19 62:2,3 62:8,11 69:23 70:1 85:19,19 86:9	<b>editor's</b> 53:7 58:8 <b>effect</b> 54:1 <b>effectively</b> 54:3 <b>eight</b> 24:4 <b>either</b> 23:11 25:8 29:2 52:21 61:1 63:5 69:22,24 86:5 86:5 87:18 <b>element</b> 63:3 <b>eleven</b> 41:2 <b>elicit</b> 4:24 <b>elimination</b> 5:16 <b>email</b> 44:18 48:20 49:2 53:17 56:18 57:22 59:25 61:11 62:18 63:16 64:2,10 64:13,16,20,20 65:8,20 66:9 66:11 67:5 68:3 69:14 71:9 72:24 73:6,14,15 74:7,10,12,18 75:1,14 83:2 <b>emailed</b> 57:18 <b>emails</b> 64:1 67:24 75:11 <b>embarrass</b> 63:9 <b>embarrassing</b> 65:17 <b>emerge</b> 9:25 88:23 <b>emerged</b> 27:18 <b>emphasise</b> 2:1 <b>employee</b> 43:22 43:22 <b>employer</b> 42:17 42:24 43:19,22 43:23 44:4 56:25 <b>employers</b> 53:25 <b>enable</b> 13:7 <b>endless</b> 87:24 <b>endorse</b> 39:16 <b>endured</b> 4:8 <b>engage</b> 43:6 71:15 72:13 73:1 77:5,8 82:19,23 <b>engaged</b> 72:24 <b>engulfed</b> 28:1 <b>enjoy</b> 7:19 <b>enjoyed</b> 15:9 <b>enjoying</b> 82:1 <b>enormous</b> 6:23 7:4 <b>enormously</b> 8:5 <b>enquiries</b> 2:11 3:17 36:11,22 <b>entered</b> 28:24 <b>entirely</b> 16:25 21:18 39:16	60:4 72:17 74:6 81:8 85:2 <b>entitled</b> 14:20 26:5 33:5 <b>entity</b> 43:19 <b>entries</b> 23:14 <b>equally</b> 42:24 89:21 <b>equipped</b> 85:11 <b>erupt</b> 58:11 <b>escalating</b> 57:12 <b>essential</b> 19:17 50:5 <b>establishes</b> 54:3 <b>et</b> 32:19 81:16 87:24 <b>ethical</b> 49:18 <b>eve</b> 2:10,16 6:9 <b>evening</b> 10:18,18 <b>event</b> 62:3 <b>events</b> 44:9 55:24,25 56:6 56:17 63:19 80:25 <b>everybody</b> 38:20 48:12 51:20 88:25 <b>everyone's</b> 21:9 <b>everything's</b> 33:25 <b>evidence</b> 1:22 2:20 4:11,19 6:20 8:9 9:24 27:3 28:3 29:22 30:16,20 31:21,23 37:9 40:18 41:8 54:5 57:24 63:21 65:24,25 67:23 72:20 75:5 76:10 78:18 84:14 <b>exactly</b> 56:13 61:21 67:11 83:12 <b>examine</b> 53:13 75:16 <b>examined</b> 35:18 <b>example</b> 18:15 31:12 37:7,16 67:20 <b>examples</b> 80:25 82:7 <b>exceptionally</b> 16:25 <b>exchanges</b> 75:12 <b>exclusive</b> 17:8 20:9 <b>exclusively</b> 20:8 31:23 <b>excuses</b> 31:7 <b>exercise</b> 51:3,15 56:20 59:8 84:2 <b>existed</b> 2:20 62:9 <b>expand</b> 77:18	<b>expect</b> 58:12 72:21 <b>expectation</b> 76:7 <b>expecting</b> 20:15 20:21 <b>expensive</b> 22:21 <b>experience</b> 8:17 10:24,24 41:3 <b>expert</b> 85:8 <b>explain</b> 9:3 50:4 58:6,10 63:4 65:12 66:3 73:24 76:14 <b>explained</b> 50:13 56:13 <b>explains</b> 56:12 <b>explanation</b> 26:9 65:13,14 <b>explicit</b> 46:19 <b>explore</b> 3:10 5:25 <b>exploring</b> 86:18 <b>explosion</b> 84:21 <b>expose</b> 37:18 47:3,6 <b>exposed</b> 87:9 <b>exposes</b> 18:16,17 <b>exposing</b> 34:17 74:2 <b>expressed</b> 64:8 <b>expression</b> 38:7 <b>expressly</b> 72:21 <b>extend</b> 77:1 <b>extent</b> 56:22 65:17 78:7 <b>extremely</b> 19:1,2 <b>eye</b> 72:15	<b>fantastically</b> 81:18 <b>far</b> 19:2 20:19 89:24 <b>fashion</b> 3:1 16:23 <b>fast-track</b> 90:14 <b>fear</b> 8:10 10:14 35:8 <b>fearful</b> 82:8 <b>feared</b> 81:1 <b>February</b> 27:11 <b>Fedorcio</b> 24:8,11 24:21 25:3,6 30:3 <b>feed</b> 24:19 <b>feel</b> 11:23 68:19 70:21 72:13 86:9 <b>feeling</b> 11:18 <b>felt</b> 11:20 26:4 50:19 60:7 72:17 82:2 84:6 85:15 <b>ferreting</b> 69:2 <b>fibre</b> 11:6 <b>fields</b> 38:20 <b>fight</b> 76:9 <b>figure</b> 1:5 <b>file</b> 78:20 <b>Filkin</b> 16:15 <b>final</b> 72:19 <b>Finally</b> 30:2 <b>find</b> 5:21 13:20 21:12,25 22:1 22:1 34:19 36:1,24 37:4 80:13,25 <b>finding</b> 60:3 90:6 <b>fine</b> 48:9,10,11 <b>finely</b> 9:16 10:9 <b>finger</b> 15:18 <b>firms</b> 40:20 <b>first</b> 1:3 6:9 12:3 24:24 26:2 40:14 41:10 54:8 55:14 56:18 58:24 64:16,23 65:3 67:1 83:13 <b>firstly</b> 13:20 <b>five</b> 2:17 11:1 <b>floor</b> 42:24 <b>flow</b> 8:20 35:15 <b>follow</b> 10:6 14:5 <b>followed</b> 27:3,4 <b>following</b> 25:2 71:7 84:6 <b>follow-up</b> 5:5 <b>force</b> 12:4 17:10 39:14 55:16,19 55:21 <b>forces</b> 18:23 <b>fore</b> 4:7 <b>forearmed</b> 64:11 <b>foresee</b> 52:25 <b>foreseeable</b>	58:20 <b>foreseen</b> 3:20 <b>forget</b> 52:15 <b>formal</b> 40:18 <b>formalised</b> 34:7 <b>former</b> 5:17 <b>formulated</b> 74:25 <b>forth</b> 74:3 <b>forward</b> 1:22 61:12 62:20 82:15 <b>foster</b> 19:15 26:11 41:10,13 41:17 44:5 45:16 46:2 49:7,11 50:7 51:1,6,13 52:11,16 53:5 53:9,13,22 54:4 55:19 56:24 57:9,18 59:6,8,15 60:8 60:15,25 61:22 63:22 66:10 67:2,24 68:4 69:24 71:4,10 71:13 72:10,20 73:5,13 74:10 75:13 79:22 83:10 88:5,11 88:17 89:18 <b>Foster's</b> 45:24 54:5 65:20 68:9 79:18 80:5 <b>found</b> 29:20 44:13 47:17 59:11 61:4 <b>four</b> 55:13 <b>fracturing</b> 8:10 <b>frank</b> 82:16 85:6 88:24 <b>frankly</b> 22:13,19 29:24 <b>freedom</b> 38:7 <b>free-for-all</b> 35:22 <b>frequent</b> 23:7 <b>frequently</b> 13:2 29:25 <b>friendly</b> 26:6 <b>front</b> 2:4,9,22 44:7 58:13 84:19,22 <b>fronting</b> 50:4 56:23 <b>full</b> 31:11 40:14 48:11 58:4 71:24 81:24 82:5,9,16 83:9 <b>fully</b> 13:21 22:3 29:7 <b>furios</b> 47:5 <b>further</b> 9:24 67:23 78:18	<b>future</b> 14:7 15:19 18:7 30:17 61:12
<b>G</b>						
						<b>gain</b> 20:1 <b>gained</b> 20:9 44:17 <b>gaining</b> 20:16 <b>game</b> 14:19 <b>gather</b> 18:25 <b>gathering</b> 27:9 <b>general</b> 24:24 27:19 31:18 33:12 <b>generally</b> 41:4 <b>generic</b> 31:6 <b>genuinely</b> 34:12 <b>getting</b> 47:18 <b>Ghaffur</b> 28:18 29:14 <b>ghastly</b> 44:6 <b>gist</b> 35:3 44:4 <b>give</b> 21:17 44:4 49:8 52:16 54:19 58:12 59:6 61:8,23 76:3,19,21 82:5 <b>given</b> 53:2 58:19 59:6 64:25 65:10 68:1 76:4 82:9 83:9 <b>gives</b> 2:4 <b>giving</b> 16:2 21:4 42:5 54:18,20 54:22 59:22 60:24 <b>go</b> 5:10 11:6 20:14,19 22:23 23:1 32:18 34:19 43:1 46:7,7 55:1 72:18 73:24 74:3 75:2 84:14 85:23 86:10 88:10 89:24 <b>God</b> 46:17 89:14 <b>goes</b> 9:11,12 35:25 58:25 73:25 80:16 83:4 88:11,25 <b>going</b> 1:17 2:6,14 3:9,21,25 4:23 5:23 7:11 8:11 8:24 9:4 10:7 10:13 12:16 13:18 15:19 16:3 21:17 22:1,19,22 23:1,19 25:5 26:23 30:10 31:11 32:25 34:9,23,24 43:25 47:2,19

48:14 49:3,12 57:10 58:23 61:23 68:23 69:18 70:10 76:25 77:5,6 78:6 84:16 86:7 <b>good</b> 15:9 17:10 17:12 23:5 26:12,12,19 29:25 37:7,16 39:20 78:17 90:22 <b>government</b> 87:20 <b>Gray</b> 41:6 <b>great</b> 4:6 8:4 39:20 43:5 59:10 69:12 <b>greater</b> 67:2 <b>Green</b> 32:9,10 32:15,19 33:8 50:13 <b>grilled</b> 24:6,6 <b>grown</b> 15:23 <b>guess</b> 18:20 <b>guesses</b> 53:16 <b>guidance</b> 33:20 <b>guilty</b> 47:1	<b>head</b> 24:11,13 27:19 <b>hear</b> 78:18 <b>heard</b> 4:11 23:23 29:21 31:21 38:19 45:11 58:4 <b>hearing</b> 9:20 68:11 69:20 71:1 78:15,16 78:19,22 79:3 84:6,17 90:24 <b>heart</b> 14:3 <b>held</b> 18:11 <b>help</b> 90:12 <b>helped</b> 2:18 <b>helping</b> 36:11 <b>he'll</b> 57:10 <b>high</b> 15:2 <b>higher</b> 41:24 60:20 62:3 <b>highest</b> 12:7 <b>highly</b> 77:21,22 <b>high-level</b> 4:19 <b>hindsight</b> 75:21 85:7,9 <b>history</b> 3:21 73:15,19,20,20 73:23 74:17,25 75:22,23 <b>Hmm</b> 5:24 <b>hold</b> 10:1,11,14 14:22,25 39:21 87:21 89:1 <b>holding</b> 39:23 89:2 <b>home</b> 32:12 41:16 58:15 <b>honest</b> 26:14 <b>Honour</b> 36:6 <b>hope</b> 39:9 <b>hopefully</b> 5:8 38:18 <b>hoping</b> 21:21 <b>horrible</b> 44:6 <b>Horton</b> 44:13 50:3 51:20 52:9 53:4,5,8 53:22,23 54:3 56:5,9,16,24 57:8 60:11,12 60:12 66:5,11 66:13,17,22 67:3,22 68:22 69:6,9,10 70:6 76:14 77:12 87:1 88:3 <b>Horton's</b> 55:19 61:11 64:14,20 65:12,13,20 66:3 67:24 68:3 83:2 85:1 <b>hospitality</b> 19:10 19:22 22:12,16 22:25 30:12 34:3,5	<b>host</b> 27:21 <b>hostile</b> 26:3 <b>hours</b> 54:21 80:16 <b>house</b> 69:5 <b>HRA</b> 55:10 <b>huge</b> 39:13 87:23 <b>hugely</b> 7:22 19:5 <b>Hugh</b> 79:11 <b>human</b> 21:15 <b>hunger</b> 30:21 <b>hypothetical</b> 50:22 51:7	<hr/> <b>I</b> <hr/> <b>Ian</b> 23:13,20 24:18 26:1,6 26:10,24 27:4 27:6,14,17,22 27:25 28:19 <b>Ian's</b> 26:20 <b>iconic</b> 8:17 <b>idea</b> 2:9 13:15 <b>identification</b> 48:5 50:11 63:18 <b>identified</b> 44:12 55:15 75:4 79:5,8 <b>identify</b> 19:16 29:12 49:24 50:1,7,17 52:7 76:14 <b>identity</b> 51:3,5 53:18 55:11 56:17 <b>ignore</b> 10:13 <b>ignored</b> 27:23 <b>illegal</b> 47:13 48:20 85:18 87:9 88:23 <b>imagination</b> 36:21 <b>imagine</b> 23:25 <b>imbued</b> 69:23 70:1 <b>immediate</b> 41:16 44:24 <b>immediately</b> 44:22 45:15 47:21 <b>impact</b> 6:21 7:10 78:2 <b>implications</b> 18:7 <b>importance</b> 39:11,16 78:7 <b>important</b> 6:5 8:5 9:23 11:8 14:16 16:11 23:25 77:21 78:25 90:18 <b>improperly</b> 62:17 <b>inappropriate</b> 18:1 22:11,15	<b>incident</b> 66:13 67:22 <b>include</b> 75:22 <b>including</b> 69:3 76:2 <b>incorrectly</b> 60:9 <b>incredibly</b> 47:8 <b>Independent</b> 69:8 <b>indicated</b> 41:17 <b>indicating</b> 16:24 <b>indicative</b> 78:8 89:11 <b>individual</b> 18:10 18:22 22:24 <b>individuals</b> 3:7 <b>indulge</b> 61:1 <b>inevitable</b> 33:21 38:25 <b>inextricably</b> 79:25 <b>inference</b> 80:18 <b>inferences</b> 29:8 77:7 <b>influence</b> 1:7,9,9 <b>informal</b> 15:17 34:8,11 <b>information</b> 4:21 8:20 13:7 15:13,25 16:2 16:22 17:2,15 17:17,23 18:2 18:5 19:1 20:1 20:3,22 21:23 22:8 25:20 29:7 31:13 35:15 44:14,17 49:25 50:12,18 50:25 51:14 53:19 60:17 63:21 68:16,17 68:21 69:16,17 71:7 78:24 79:5,9 84:8 85:1 88:4 <b>informed</b> 9:5 11:14 13:5 15:22 55:20 <b>infraction</b> 61:12 <b>initial</b> 8:13 57:22 <b>initially</b> 27:14 <b>injunction</b> 57:6 57:10,13 58:18 72:11 76:10 <b>innocent</b> 37:3 88:9 <b>innocuous</b> 5:22 <b>inquest</b> 2:14 <b>inquiry</b> 5:9 7:4 12:4 23:23 33:24 34:4 38:15 40:16,18 41:7 50:13 55:17 89:3 <b>inserted</b> 1:24 <b>inside</b> 50:14 51:6	51:10 <b>insider</b> 31:2,4 <b>insists</b> 22:24 <b>insofar</b> 28:3 <b>instigated</b> 55:20 <b>instructions</b> 54:18,23 58:7 <b>integrity</b> 18:11 38:9 <b>intensity</b> 30:11 34:5 <b>interactions</b> 34:24 <b>interest</b> 4:6,8 7:23 17:13 18:13 19:5 28:22 34:10 35:9,10,23 36:20 37:11 38:5 39:11 44:16 45:7,8 45:10,20 47:2 47:3,6,11,16 47:22 48:8,13 50:20 55:9 60:16 61:16,17 62:8,25 63:3 66:24 72:3,7 77:2 80:12 83:18 87:17,22 88:1,2 <b>interested</b> 1:16 1:19 2:15 4:1,1 90:1 <b>interesting</b> 43:14 78:4 <b>interests</b> 39:3 78:2 <b>internal</b> 9:13 <b>Internet</b> 69:3 <b>interrupt</b> 9:2 <b>intertwine</b> 80:1 <b>interviewed</b> 69:8 <b>intimidating</b> 5:19 <b>intruding</b> 44:18 <b>investigated</b> 75:4 <b>investigating</b> 11:14 <b>investigation</b> 5:9 5:11 6:22 7:1 8:24 13:23 55:18 <b>investigations</b> 38:10 <b>investigative</b> 39:11,17,19 <b>invidious</b> 85:16 <b>involve</b> 15:6 <b>involved</b> 16:16 25:17 32:20 62:7 78:2 <b>inwards</b> 51:8 <b>in-house</b> 40:22 43:15 86:21 88:21	<b>in-out</b> 50:16 <b>irrelevant</b> 67:18 71:21 <b>issue</b> 1:3,16 8:15 9:17 11:12 12:10 14:3,15 15:16,21 16:11 19:10 22:13 27:15,20 32:15 34:6 36:15 37:7 59:24 66:11,12,21,22 67:23 72:24 74:9 76:6 77:24 78:5,8 83:13,14,17 89:6,11 90:17 <b>issued</b> 28:18 <b>issues</b> 34:3 49:18 55:10,10 76:6 76:25 78:18 79:3 82:18 83:11 86:24 90:7,15 <b>items</b> 23:1	<hr/> <b>J</b> <hr/> <b>James</b> 58:1,4 <b>January</b> 27:11 <b>Jay</b> 1:3 5:25 9:2 13:4 14:14 16:6,10,21 21:7 24:23 29:10 31:6 39:5 40:1,5,10 40:13,14 42:13 43:17 49:6 52:11,18 56:6 59:22 61:20 62:2 65:19 71:2,21 74:9 76:17 78:12 80:5,15 81:9 82:8 83:25 84:3 85:14 86:18 89:24 90:21 <b>jeopardise</b> 7:1 8:24 13:23 <b>jeopardy</b> 1:6,17 <b>JH3</b> 54:8 55:2 68:15 71:3 80:9 <b>JH4</b> 64:1 65:9 <b>job</b> 15:5 21:25 27:23 28:16 52:18,19 54:17 <b>John</b> 23:10,11,22 23:23 40:12,15 <b>join</b> 20:5 52:1 <b>Jonathan</b> 66:15 76:13 <b>journalism</b> 39:12,19 <b>journalist</b> 14:23 14:25 19:23	21:25 41:21 42:18 50:16,22 51:7-10 61:18 69:8 70:13 71:4 85:16,20 86:10 <b>journalistic</b> 29:4 68:23 <b>journalists</b> 10:8 14:20,21 17:5 18:23 27:3 36:10,12 39:14 39:17 42:23 49:2 52:18 67:20 <b>judge</b> 84:23 <b>judgment</b> 8:15 11:3 16:19 31:19 36:15 80:2 84:9 <b>judicial</b> 84:21 <b>Jujitsu</b> 52:6,10 56:12 <b>June</b> 23:17 58:5 63:22 68:11 71:2 72:2,6 73:8 75:12 <b>junior</b> 22:12,16 22:18,20 48:17 63:5 64:2 <b>justice</b> 3:14,15 5:24 6:12,16 6:18,20 7:2,7 7:10,14,21,24 8:1,3,8 9:1,8 9:11,15,19,23 10:3,6,15,21 10:23 11:10,12 11:17,20,22,25 12:3,7,10,13 12:15,19,21,24 13:1 15:23 16:5,7,14 35:21,25 36:5 36:13,16,18 37:3,7,14,24 38:4,7,9,12,17 38:19,22,25 39:7,16,19,25 40:3,9,11 42:2 42:7,9,16 43:2 43:9,13,16 46:24 47:4,15 48:6,24 49:3 51:22 56:1 58:24 59:10,17 59:19 61:19 63:8 65:5,8 69:12,20 70:7 70:16,19 71:19 74:6 76:13,16 77:17 78:11,16 79:7,12,15 80:4,9,21 81:5 81:7,9,19,22 81:25 82:6
--	--	---	--	--	---	---	--	--

83:13,16,22	<b>Lancashire</b> 56:4	54:25 57:12	67:15	79:7,12,15,20	59:3 61:9	<b>mine</b> 32:12 38:23
84:6,17,20,22	56:8	62:20,20,21	<b>link</b> 2:21	80:4,9,21 81:5	64:13 66:17	<b>minute</b> 77:19
84:24 85:5,13	<b>language</b> 46:18	73:4 74:23	<b>listen</b> 24:19	81:7,9,18,19	70:2 72:17,21	<b>minutes</b> 40:3,5
86:3,17 87:3,6	<b>largely</b> 31:23	88:11	<b>listening</b> 24:12	81:22,25 82:6	<b>matters</b> 3:12 4:5	<b>misconduct</b>
88:16,19 89:4	<b>late</b> 10:18,19,19	<b>let's</b> 28:21 44:8	<b>litigation</b> 54:9	83:13,16,22	5:22,23 28:24	79:21
89:6,9,16,20	<b>lavish</b> 22:12	52:15,15 53:13	58:11 68:14	84:24 85:5,7	71:12 90:11	<b>misdeemeanours</b>
89:25 90:5,18	<b>lavishing</b> 22:16	72:9 76:21	84:9	85:13 86:3,15	<b>maze</b> 50:14 51:6	65:10
90:22	<b>law</b> 1:21 41:3	80:4,5	<b>litigious</b> 19:1,2	86:17 87:3,6	51:8,10	<b>misinformed</b>
<b>justifies</b> 87:15	45:2 58:15,15	<b>level</b> 28:15	53:1 54:13	87:14 88:16,19	<b>mean</b> 7:12 9:8	31:7
<b>justifying</b> 87:12	58:22 64:8	<b>LEVESON</b> 5:24	59:3	89:4,6,9,16,20	10:8 16:2	<b>mislead</b> 59:1
	67:19 69:22	6:12,16,18,20	<b>little</b> 5:13 50:21	89:25 90:5,18	18:20 24:25,25	62:11 63:12
	70:5 76:11,11	7:2,7,10,14,21	<b>living</b> 11:7	90:22	41:20 58:23	85:20
<b>K</b>	76:25 77:7	7:24 8:1,3,8	<b>loath</b> 5:10	<b>lose</b> 59:19	66:15 68:13	<b>misleading</b> 68:19
<b>keen</b> 26:11 30:9	86:24 87:7	9:1,8,11,15,19	<b>lobby</b> 32:11	<b>losing</b> 76:20	70:4 79:18	70:20 82:4
57:16,19 90:6	<b>Lawrence</b> 1:3,20	9:23 10:3,6,15	<b>London</b> 11:3	<b>lot</b> 10:12 15:10	83:19 84:1	<b>misled</b> 59:5
<b>keep</b> 38:1 48:24	3:14 8:18 10:2	10:21,23 11:10	<b>long</b> 11:8 14:18	17:8,12 32:24	85:8 87:11,19	72:16
82:11,23 84:3	14:9 17:7	11:12,17,20,22	77:23	32:24 52:11	88:10,12 89:17	<b>misread</b> 70:21
<b>Keith</b> 54:17	24:22 25:2	11:25 12:3,7	<b>longer</b> 16:8	<b>lowest</b> 82:17	89:19	70:23
<b>key</b> 24:3 34:5	37:9	12:10,13,15,19	<b>look</b> 35:14 39:1,2	<b>lunch</b> 19:15,19	<b>meaning</b> 90:14	<b>mistake</b> 88:8,9
<b>kill</b> 47:19	<b>Lawrences</b> 7:8	12:21,24 13:1	46:20,22 47:20	20:6,19 21:10	90:16	<b>misunderstand</b>
<b>killers</b> 2:14	7:18,20 8:3	15:23 16:5,7	52:22 58:14	22:2 23:14,16	<b>means</b> 50:2	77:19
<b>kind</b> 42:5 46:14	<b>laws</b> 1:17 34:21	16:14 35:21,25	61:19,22 63:10	24:2,8 25:6	87:15	<b>misunderstood</b>
84:18	<b>lawyer</b> 40:22	36:5,13,16,18	68:15,25 73:8	26:14 30:7	<b>meat</b> 47:7	61:12
<b>knew</b> 2:20 45:8	47:7 54:19	37:3,7,14,24	77:5 78:13	<b>lunches</b> 24:10	<b>mechanism</b> 38:2	<b>Misuse</b> 45:11
46:5 48:19	65:5,6,7 77:22	38:4,7,9,12,17	80:5 87:16		87:9	48:13,19 62:7
51:3,5 59:11	86:21 88:21	38:19,22,25	<b>looked</b> 45:5	<b>M</b>	<b>media</b> 34:12	66:23
59:13 66:4	<b>lawyers</b> 43:15	39:7,16,19,25	<b>looking</b> 14:18	<b>Mail</b> 4:12,22	35:18,19 41:3	<b>misusing</b> 60:17
72:14 74:7,12	<b>lawyer's</b> 57:11	40:3,9,11 42:2	18:17 19:11	8:21 19:3	<b>meet</b> 19:18 21:10	88:3
75:13,15 83:2	<b>lay</b> 52:23	42:7,9,16 43:2	30:5 35:14	23:12 24:16	<b>meeting</b> 1:12	<b>Mm</b> 11:11 29:6
86:23 88:23	<b>lead</b> 8:5 35:19	43:9,13,16	36:19 52:1	25:25 27:2	4:20,21 19:25	39:18 62:13
<b>know</b> 3:9,24 4:22	<b>leading</b> 2:8 63:5	46:24 47:4,15	61:11 64:22,23	31:24,25 32:2	20:14 22:20	67:16 87:5
5:20 10:3	<b>leads</b> 42:21	48:6,24 49:3	65:23 67:19	32:16 33:5	30:13	<b>Mm-hm</b> 5:6
12:20,20 13:19	<b>leak</b> 8:11 14:5,6	51:22 56:1	70:2 89:3	<b>Mail's</b> 23:19	<b>meetings</b> 23:7	<b>mobile</b> 21:4
13:24 15:4,5	36:22	59:10,17,19	<b>looks</b> 51:24	<b>main</b> 34:2 73:12	30:11	<b>module</b> 38:15
15:20 17:4	<b>leaked</b> 14:21	61:19 63:8	<b>Lord</b> 5:24 6:12	<b>maintained</b>	<b>megaphone</b> 16:7	<b>moment</b> 29:15
20:5 21:8,19	15:3,12	65:5,8 69:12	6:16,18,20 7:2	14:17	<b>Member</b> 32:15	79:19
22:20 25:9,23	<b>leaks</b> 15:6 36:18	70:7,16,19	7:7,10,14,21	<b>making</b> 1:7 2:11	<b>memory</b> 6:10	<b>Monday</b> 90:20
26:17,18 27:6	36:19	71:19 74:6	7:24 8:1,3,8	3:17 55:14	24:1	90:21,25
28:17 29:13	<b>learned</b> 17:24	76:16 77:17	9:1,8,11,15,19	63:14 73:15	<b>men</b> 2:23 3:15	<b>monitored</b> 30:12
36:3 37:25	<b>learnt</b> 84:25	78:11 79:7,12	9:23 10:3,6,15	74:18,25 84:9	11:1	<b>months</b> 24:4
39:10,13 48:11	<b>leave</b> 59:23	79:15 80:4,9	10:21,23 11:10	<b>man</b> 18:10 19:1	<b>mention</b> 25:9	<b>morning</b> 54:25
48:12 50:22	<b>led</b> 15:8	80:21 81:5,7,9	11:12,17,20,22	19:4 46:6	54:8	61:3 64:3
51:22 56:15	<b>left</b> 31:19 41:18	81:19,22,25	11:25 12:3,7	<b>management</b>	<b>mentioned</b> 1:16	<b>motivation</b> 3:11
58:1,23 61:15	<b>legal</b> 13:16 42:13	82:6 83:13,16	12:10,13,15,19	28:8,25 29:10	63:13	3:12 32:17
63:11,19 64:25	43:3,10,11,18	83:22 84:24	12:21,24 13:1	29:17	<b>mentions</b> 26:2	<b>motives</b> 3:23
65:19 66:17,19	43:20,20 44:2	85:5,13 86:3	15:23 16:5,7	<b>manager</b> 41:16	<b>mere</b> 35:3	17:16,19 18:4
67:14 69:10	47:5 55:9 58:6	86:17 87:3,6	16:14 23:2	46:1,5,6,8 58:6	<b>merely</b> 36:22,23	<b>mouth</b> 74:4
72:2 75:9	58:22 66:21	88:16,19 89:4	35:21,25 36:5	<b>managers</b> 45:25	<b>message</b> 13:8	<b>move</b> 18:25
77:18 79:5	71:24 76:6	89:6,9,16,20	36:13,16,18	<b>managing</b> 49:10	29:25	19:10 23:13
85:15 88:12	78:4,18 83:11	89:25 90:5,18	37:3,7,14,24	<b>manifest</b> 47:22	<b>met</b> 9:12 23:10	33:12 49:22
89:5 90:6	86:24	90:22	38:4,7,9,12,17	<b>manifests</b> 88:24	26:14 28:22	52:15,17 62:20
<b>knowing</b> 51:1	<b>legally</b> 62:15,16	<b>libel</b> 30:22 45:13	38:19,22,25	<b>man's</b> 18:7	29:15 30:4	<b>moved</b> 40:21
56:23 60:11	79:24	65:6,7 90:8	39:7,16,19,25	<b>March</b> 40:17	<b>metaphorical</b>	<b>moves</b> 34:8
<b>knowledge</b> 2:17	<b>legislation</b> 48:16	<b>life</b> 3:8 80:25	40:3,9,11 42:2	90:25	15:18	<b>Moving</b> 54:15
3:7 11:2 20:17	<b>legitimate</b> 36:11	<b>lifestyle</b> 30:1	42:7,9,16 43:2	<b>Martin</b> 41:15	<b>Metropolitan</b>	<b>MP</b> 33:9
23:10 25:5,18	48:5 50:2,17	<b>light</b> 53:8 57:8	43:9,13,16	46:1,12 52:22	5:1,20 24:17	<b>MPS</b> 13:5
<b>knowledgeable</b>	50:19 51:14	63:21	46:24 47:4,15	54:25 56:15	32:18 39:13	<b>murder</b> 8:6
3:19 4:4	63:18 76:15	<b>likelihood</b> 22:7	48:6,24 49:3	57:8 60:14	<b>mightn't</b> 77:10	<b>murderers</b> 2:4
<b>known</b> 57:22	85:2	57:12	51:22 56:1	<b>material</b> 31:5	84:15	11:2
83:17	<b>legitimately</b>	<b>Limited</b> 40:23	59:10,14,17,19	50:7 51:4 69:3	<b>million</b> 77:17	
<b>knows</b> 51:14,25	51:21 56:11	<b>limits</b> 41:23	61:19 63:8	70:9	<b>mind</b> 2:18 45:5	<b>N</b>
52:1,2,12 54:4	59:9,15 62:24	74:14	65:5,8 69:12	<b>matter</b> 13:23	48:15 54:5	<b>name</b> 4:23 40:14
66:15	72:25 73:1	<b>line</b> 26:1 41:16	69:20 70:7,16	16:18 19:20	57:4 59:13	65:12,13 66:3
	79:23 82:12,24	45:25 46:1,4,6	70:19 71:19	23:19 46:14	77:20	78:23 84:7
<b>L</b>	83:3 84:2,10	46:8 61:8	74:6 76:16	49:9,13 52:25	<b>mindful</b> 5:22	85:1
<b>Labour</b> 33:9	<b>letter</b> 53:6 54:7	<b>lines</b> 49:22 55:13	77:17 78:11	54:12 55:9	34:6	<b>named</b> 11:1
<b>lacked</b> 62:8						

55:16 83:21 88:3 <b>names</b> 4:24 <b>naming</b> 77:2 <b>narrow</b> 5:13 <b>nasty</b> 64:11 <b>naturally</b> 45:2 <b>nature</b> 21:15 <b>naughty</b> 65:11 66:1,1,2 <b>near</b> 29:22,24 <b>necessarily</b> 14:7 16:3 34:13 35:3 37:25 42:25 70:14 <b>necessary</b> 36:12 36:13 <b>need</b> 27:24 36:23 42:19 45:24 49:13 67:12 76:3 89:24 <b>needed</b> 3:5 78:17 78:22 79:4 84:7 <b>needs</b> 34:7 <b>neither</b> 42:2 60:13 <b>network</b> 75:8 <b>networks</b> 74:2 <b>neutral</b> 21:18 <b>never</b> 16:10,11 18:11 22:16 23:10 25:4 54:24 63:13 70:13 <b>new</b> 33:20 37:9 <b>news</b> 41:16 <b>newspaper</b> 7:19 8:15 33:2 42:25 48:3 49:20 77:22,23 80:24 81:12 85:19 87:25 88:22 <b>newspapers</b> 10:8 23:24,25 36:1 40:23 74:1 <b>newsroom</b> 42:23 46:7 <b>nice</b> 20:20 47:5 <b>night</b> 10:19 54:18 <b>NightJack</b> 41:9 44:13 47:3 49:24 50:1,7 50:11,17,24 52:9 53:24 55:15 56:5 69:10 77:12 80:14 <b>NightJack's</b> 44:18 53:17 78:23 84:7 <b>nine</b> 24:4 <b>norm</b> 16:24 <b>normally</b> 58:12	<b>north-east</b> 1:18 <b>note</b> 6:5 73:4 <b>notice</b> 54:21 78:20 <b>November</b> 4:12 4:20 14:4,11 25:7,9 26:11 <b>nth</b> 35:18 <b>number</b> 23:24 24:14,15 30:19 69:9 87:19 90:13 <b>nutshell</b> 44:12 <hr/> <b>O</b> <hr/> <b>objected</b> 8:23 <b>objection</b> 6:10 <b>obligation</b> 60:20 <b>obligations</b> 29:5 85:22 <b>oblique</b> 65:17 <b>obtain</b> 63:4 <b>obtained</b> 75:6 87:17 <b>obvious</b> 12:24 58:25 <b>obviously</b> 2:6 8:13 12:22 14:16,17 17:9 24:11 26:10,15 31:7 32:2,21 36:8 42:4,22 58:20,21 62:11 62:19 69:7 71:18 84:17 87:16 90:18 <b>occasion</b> 13:3,4 17:15,24 18:18 20:21 23:15 31:15 47:25 64:23 90:11 <b>occasionally</b> 24:14 <b>occasions</b> 19:25 20:10 21:21 24:17 30:8 64:22 87:25 <b>occur</b> 76:23 <b>occurred</b> 59:7 <b>occurrence</b> 35:4 <b>October</b> 23:15 23:16 26:3 <b>offence</b> 44:25 45:18 49:17 63:2 <b>offered</b> 90:14 <b>offer</b> 6:14 9:4 10:20 13:5,6 13:12 19:20 24:20 31:16,17 41:15 53:7 54:24 55:3 73:25 <b>officer</b> 3:4,5 5:14 11:15,18 18:21 19:19 20:5,14	20:21 21:3,16 21:22 22:12,12 22:18,19,20,22 26:15 39:1 60:16 82:3 83:20 <b>officers</b> 15:10,17 17:5 19:7,24 20:10 21:8 22:16 25:1 27:3 30:4 35:14 36:11 <b>offices</b> 23:8 <b>oh</b> 10:13 24:25 28:12 33:17 81:19 <b>okay</b> 14:15 16:14 25:25 30:2 33:12 34:1 40:2 44:10 51:12 59:24 72:1 <b>old</b> 70:24 <b>old-style</b> 69:22 70:4 <b>Olswang</b> 53:6 54:20 72:17 <b>Olswangs</b> 68:2 71:2 75:17 76:2 77:4 <b>once</b> 2:1 24:4,7 24:12 66:1 74:20,22 77:18 79:22 <b>ones</b> 8:15,18 <b>one's</b> 15:11,11 <b>one-off</b> 47:25 61:3,15 <b>one-to-one</b> 24:8 <b>ongoing</b> 14:8 <b>online</b> 4:15 <b>open</b> 1:15 88:24 <b>operate</b> 19:23 22:14 <b>operating</b> 30:1 <b>opinion</b> 11:3 27:25 35:16 65:2 85:10 <b>opponent's</b> 64:4 <b>opportunity</b> 1:23 <b>oral</b> 56:14 <b>order</b> 13:16 20:1 82:14 <b>organisation</b> 28:20 <b>ought</b> 63:11 67:18 <b>outcome</b> 82:9 83:8 <b>outside</b> 51:7,21 67:20 <b>outwards</b> 50:14 51:6 <b>overemphasis</b> 19:21 <b>overexaggerate</b>	78:6 <b>over-arching</b> 78:1,4 86:9 <b>owed</b> 41:24 70:6 <b>owes</b> 59:1 <b>owing</b> 76:1 <b>owned</b> 71:9 <b>Oxford</b> 61:5 63:23 64:6,12 64:16,25 65:10 65:23 66:11,21 67:3,21 73:20 74:1,9,14 75:2 75:14,18 <b>o'clock</b> 90:24 <hr/> <b>P</b> <hr/> <b>page</b> 2:5,9,22 33:14 49:23 54:7 55:2 57:20 64:1,2,9 64:9 65:8 66:8 68:15 70:3 71:3 72:18,18 73:3,9,12 80:8 80:9 <b>paper</b> 8:4 13:24 24:3 49:10 <b>papers</b> 32:24 34:17 36:20 <b>paragraph</b> 1:4 2:3 18:15 30:4 33:13,15,16,18 41:11 44:16,21 45:3 49:7,22 54:15 55:8,13 57:15 58:6 61:7,19 72:19 73:12 78:14 80:6,15,21 81:9,10,25 84:5 <b>parcel</b> 55:23 <b>Parliament</b> 32:16 <b>part</b> 10:24 19:12 19:18,22 20:7 20:25 24:18 32:17 38:15 50:5 55:23,25 73:23 81:1 86:21 90:18 <b>particular</b> 18:21 27:7 28:10,15 32:9 58:23 63:6 70:3 77:2 <b>particularly</b> 5:7 22:24 26:3 29:18 77:1 <b>partly</b> 52:24 <b>Party</b> 32:17 <b>passing</b> 57:4 <b>password</b> 53:17 <b>Patrick</b> 41:13 46:2,4,9,11,13 46:15 53:5,9	54:18 56:4 57:9 59:15 60:8,15,25 61:22 62:15 69:4,24 71:4 72:23 73:24 74:19 75:10 77:14,15 79:22 82:19 83:10 88:5,11,14 89:18 <b>Patrick's</b> 46:10 65:10 74:4 <b>Pause</b> 14:13 20:3 29:2 81:7 <b>pen</b> 37:10 <b>people</b> 10:12 13:1 14:4 15:22 16:17 17:10,12 21:9 27:6 28:3,10 28:13,25 30:11 30:13 34:20 35:8,9,18 46:10 47:19 68:20 69:7,9 69:15,23 87:6 <b>people's</b> 49:2 <b>perceived</b> 23:25 24:16 33:25 <b>perfectly</b> 13:1 20:11 50:15,19 56:10 72:14 76:15 79:24 83:19 <b>periodical</b> 77:22 <b>persecuted</b> 35:11 36:10 <b>persistence</b> 76:2 <b>person</b> 16:21,25 46:8,12,13 52:3,8 87:10 <b>personal</b> 19:21 42:22 <b>personally</b> 6:25 56:3 60:7 <b>perspective</b> 8:16 30:23 31:8 <b>persuaded</b> 52:5 60:10 <b>phone</b> 5:19 6:11 21:4 56:11 67:9,10,11 <b>phoned</b> 69:4 <b>phrase</b> 24:5 <b>phrased</b> 83:6 <b>piece</b> 4:11,22 20:22 26:2 30:24 31:2 48:5,15 <b>place</b> 56:18 <b>placed</b> 8:13 84:11 <b>plainly</b> 41:3 <b>planning</b> 2:10 <b>pleaded</b> 69:21	<b>pleasant</b> 20:11 <b>please</b> 1:4 6:11 30:19 40:10,14 41:10 55:7 66:9 <b>pleasure</b> 77:20 <b>pm</b> 1:2 40:6,8 90:23 <b>point</b> 12:22 15:18 16:3 30:2,15 31:9 45:5 57:4,21 58:23 63:6 66:21 67:21 68:2,9,15 71:14,16 76:11 76:16,17 77:7 77:12 78:3,4,5 78:9 89:4 <b>pointing</b> 66:7 <b>points</b> 7:15 55:14 66:23 <b>police</b> 1:10 2:25 4:14,24 5:1,14 5:20 6:6 7:1,8 8:19,23 11:18 14:5,9,17,19 14:22,25 15:10 15:17 16:8 17:4 18:23,23 19:19 20:5,10 20:14 21:8 24:17 27:2,19 31:2,4,6 32:18 34:12,13,18 35:7 36:11 37:18,19 39:1 39:13,21 44:14 55:16,19,20 56:4,8 60:16 75:4 82:3 83:20,20 88:4 <b>police/media</b> 33:20 <b>political</b> 32:19 33:1,5 <b>position</b> 33:6 47:8 48:6 56:25 72:10 76:1 79:16 <b>positive</b> 2:1 <b>possibility</b> 10:10 13:14 72:12 77:25 84:24 <b>possible</b> 3:10 29:8 30:17 45:19 54:8 66:7 86:18 <b>possibly</b> 1:9 22:22 40:5 <b>post</b> 81:12 <b>potential</b> 7:8 <b>powerful</b> 1:24 <b>PPS</b> 67:5 <b>practice</b> 43:4 <b>practices</b> 78:2	<b>preceding</b> 5:4 <b>precise</b> 81:18,19 81:22,23 86:24 <b>precisely</b> 9:4 10:21 43:25 44:6 45:1 49:1 71:20 73:8 81:4 89:3 90:13 <b>precision</b> 43:18 <b>prej</b> 67:19 <b>prejudice</b> 67:22 <b>prejudicing</b> 73:17 <b>prepared</b> 62:16 68:13 84:25 <b>presence</b> 3:4 <b>present</b> 4:9 <b>presented</b> 79:23 <b>president</b> 1:13 <b>press</b> 3:5 6:8,14 9:3 10:16,20 13:5,6,12 24:11,13 25:1 26:15 31:16,17 78:3 87:8 89:1 89:2 <b>presumably</b> 41:24 44:24 65:6 70:17 <b>presupposes</b> 42:6 <b>pretty</b> 54:5 61:21 <b>previous</b> 25:10 26:7 <b>previously</b> 39:8 <b>pre-empt</b> 26:23 <b>prima</b> 45:17 <b>prior</b> 1:10,10 63:17 71:1 <b>privacy</b> 58:14,22 70:2 76:8,25 86:25 90:7 <b>private</b> 1:12 26:14 <b>privilege</b> 42:14 43:3,6,12,21 44:3 60:1 <b>privileged</b> 42:3,4 42:10,11,12 <b>probably</b> 15:23 16:24 24:3 42:11 56:22 81:15 84:21 88:8 90:2 <b>probe</b> 88:13 <b>probing</b> 88:20 <b>problem</b> 35:6 41:17 46:3 <b>problems</b> 12:1 37:15 52:25 82:13 <b>proceedings</b> 9:13 28:19 30:22 53:10,12 90:9 <b>process</b> 5:16
--	--	---	--	--	---	---

20:7,19,25 21:18 51:16 60:21 63:18 <b>processes</b> 49:20 <b>products</b> 47:19 <b>professional</b> 11:18 15:9 19:14,14 26:19 31:8 43:12,20 <b>prognostication</b> 54:11 <b>promotion</b> 27:21 <b>proper</b> 48:2 <b>properly</b> 27:23 79:24 88:5 <b>Proposals</b> 33:16 <b>propose</b> 6:15 9:2 <b>proposing</b> 1:13 13:6 <b>proposition</b> 7:3 34:23 82:15 <b>prosecuted</b> 71:23 72:2 83:10 <b>protect</b> 36:24 77:1 <b>Protection</b> 45:4 <b>protective</b> 5:7 <b>provide</b> 4:17 17:23 21:22 <b>provided</b> 17:2,14 25:20 40:16 41:6 50:6 71:6 87:13 <b>provides</b> 38:2 <b>providing</b> 16:21 17:16 <b>provision</b> 31:12 <b>provoke</b> 53:12 <b>PS</b> 67:5 <b>public</b> 3:13 4:6 7:23 18:13 19:5 28:1,22 28:25 34:10,14 35:8,10,23 36:20 37:11 38:5 39:11,13 44:16 45:6,8 45:10,19 47:2 47:3,6,10,16 47:22 48:4,8 48:13 50:8,18 50:20 56:20 60:4,16,17 61:16,17 62:8 62:25 63:3 66:24 69:2 72:3,7 77:2 79:6 80:12 83:18 87:17,22 88:1,2 <b>publication</b> 2:10 2:16 6:9 7:3 50:3 <b>publicly</b> 49:25	50:12,24 51:3 53:19 78:23 79:8 84:8 <b>publish</b> 2:7 13:6 13:9 14:11 17:20 50:8 53:25 54:20 <b>publishable</b> 52:21 <b>published</b> 6:2,13 87:22 <b>publisher</b> 40:24 <b>publishing</b> 14:6 44:15 69:5 <b>pure</b> 3:23 25:12 25:13,13 76:11 <b>purpose</b> 24:10 73:17 <b>pursue</b> 52:19 <b>put</b> 1:14 3:5 6:5 6:7,8,13 10:16 10:17 13:13 20:4 28:7,14 29:3 31:10,18 35:17 50:2 59:12 60:12 62:16 72:10,17 77:6 80:9 82:15,17 85:15 85:16,21 <b>putting</b> 15:2 38:14 60:17 63:16 70:22 76:10	<hr/> <b>R</b> <hr/> <b>race</b> 28:18 29:14 <b>raise</b> 1:17 9:15 11:13 12:22 30:10 <b>raised</b> 12:10 44:22 55:9 <b>raises</b> 43:14 78:7 <b>raising</b> 78:3 <b>ramifications</b> 45:23 <b>ran</b> 9:6 <b>rang</b> 6:14 <b>rat</b> 68:6,7,8 <b>reach</b> 11:22 76:1 <b>reaching</b> 78:19 <b>react</b> 52:19 <b>reaction</b> 8:14 44:24 47:23 58:13 <b>read</b> 61:7 70:17 90:2 <b>readily</b> 85:8 <b>real</b> 10:23 11:25 77:24 80:25 82:3 <b>reality</b> 8:21 26:24 59:19 <b>really</b> 11:13 32:12 46:20 48:7 51:12 62:1 65:14 79:17 <b>reason</b> 19:12 56:1 77:20 85:23 <b>reasonable</b> 72:14 76:7 <b>reasonably</b> 23:5 86:25 <b>reasoning</b> 10:25 <b>reasons</b> 36:23 69:18 86:18 90:2 <b>rebuilt</b> 8:9 <b>rebut</b> 79:16 <b>recall</b> 9:7 14:13 14:13 <b>receive</b> 28:5 <b>received</b> 15:12 30:20 45:16 90:9 <b>receiving</b> 5:18 22:8 <b>recipient</b> 27:8 <b>recognised</b> 18:12 <b>recommendati...</b> 30:17 <b>record</b> 35:1,12 41:19,20 43:17 46:15 49:12 <b>recorded</b> 34:25 <b>records</b> 22:25 49:4 52:8 70:10 76:24 79:4 89:20	64:4 69:1 <b>reference</b> 1:25 16:15 64:5,12 64:13 66:16 69:11 70:3,4 70:23 <b>references</b> 52:6 <b>referred</b> 31:2 75:23 <b>referring</b> 66:13 73:19 75:2 78:14 <b>reform</b> 33:16 <b>regard</b> 8:4 12:7 17:10 42:11 43:11 71:10 73:16 78:25 <b>regarded</b> 46:8 55:8 <b>regarding</b> 55:10 <b>regardless</b> 49:16 <b>regards</b> 73:13 <b>regulations</b> 75:7 83:21 <b>reinvent</b> 3:21 <b>reiterate</b> 20:8 <b>related</b> 31:24 <b>relating</b> 4:11 <b>relation</b> 1:18,20 14:3 26:1 30:20 32:8,14 32:18 36:18 44:3 66:4,22 67:3,22 74:9 <b>relations</b> 33:20 44:3 <b>relationship</b> 7:18 7:19 8:9 14:8 15:9 22:6 23:5 23:20,21 26:12 26:12,13,19 77:25 88:21 <b>relationships</b> 19:15 42:23 <b>relentlessly</b> 25:3 <b>relevant</b> 23:14 63:20 64:1 76:5 <b>remained</b> 2:23 69:25 83:11 <b>remarks</b> 27:17 <b>remember</b> 7:15 10:15 23:18 25:14 55:14 56:13 58:2 61:21 67:9,11 72:23 <b>remote</b> 57:13 <b>repeal</b> 1:6 <b>repeat</b> 17:6 81:25 <b>repeating</b> 7:14 <b>report</b> 16:15 28:16 33:3 39:10 49:9,13 81:12 87:20	<b>reported</b> 28:2 61:9 <b>reporter</b> 2:2 20:6 20:11 <b>reporters</b> 1:15 <b>reporting</b> 16:16 26:18 61:24 <b>representations</b> 9:5 13:25 <b>reputable</b> 77:21 77:22 <b>request</b> 10:13 13:9 <b>require</b> 34:24 <b>research</b> 3:18 <b>resigned</b> 18:9 <b>resolution</b> 90:2 <b>respect</b> 6:23 17:5 22:3 59:10 69:12 <b>respected</b> 3:18 33:21 <b>respects</b> 38:7,9 <b>responsible</b> 5:10 30:24 37:5 49:19 80:14 <b>restaurant</b> 20:20 20:20 22:7,21 23:9,11 25:6 <b>result</b> 1:23 59:12 <b>resulted</b> 30:22 <b>results</b> 28:5 <b>retrial</b> 1:23 <b>returned</b> 55:3 <b>reveal</b> 68:17 69:16 80:12 <b>revealing</b> 19:4 <b>revelations</b> 19:6 19:6 <b>Reynolds</b> 50:5 <b>re-examine</b> 90:11 <b>Richard</b> 44:13 <b>rift</b> 7:8 <b>right</b> 4:10 7:9,13 8:12 9:7 12:19 12:22,24 13:10 16:19 20:18 31:9,10 33:17 36:1,2 42:1 46:2 48:1 49:5 54:13 57:3 61:20 63:8 64:18 68:2,7 71:13 80:8 84:11,12,21 85:4 86:17 90:20 <b>rightly</b> 66:22 70:11 78:25 79:20 89:1 <b>ring</b> 10:20 21:4 <b>rings</b> 56:10 <b>risk</b> 8:10 9:6 12:16 59:5 <b>rock-crushing</b>	48:7 <b>role</b> 17:5 24:18 32:10,13 33:2 58:6 <b>roof</b> 61:6 <b>room</b> 46:2 77:25 89:18 <b>roughly</b> 45:21 <b>round</b> 35:22 <b>route</b> 87:12 <b>rule</b> 1:7 <b>rules</b> 34:11,21 35:13 <b>run</b> 6:11 8:22,23 9:5 10:19 11:1 11:7 13:18 14:1 16:19 18:8 31:20 76:11 77:6 80:22 <b>running</b> 18:6 <b>runs</b> 13:24 <b>rush</b> 68:14 <b>rusticated</b> 61:5 63:22 <b>rustication</b> 64:6	<hr/> <b>S</b> <hr/> <b>sack</b> 46:22 <b>sad</b> 26:24 <b>safe</b> 38:4 <b>safeguard</b> 35:17 <b>safeguards</b> 36:9 <b>satisfaction</b> 79:2 <b>satisfied</b> 6:1 17:1 <b>saw</b> 41:13 <b>saying</b> 11:4 12:20 13:18 16:23 26:17 34:2 42:19 52:20 57:19 58:25 59:17 64:24 65:23 68:23 71:3 77:12 82:11,20 <b>says</b> 53:24 56:10 67:5 80:11 84:10,25 86:3 <b>scared</b> 19:8,8,9 35:19 <b>scooped</b> 10:14 <b>Scotland</b> 6:8,14 19:7 23:12 24:13 29:22,25 31:17 <b>scrutiny</b> 39:15 <b>search</b> 52:3,3 <b>second</b> 5:3 13:4 53:21 57:4 61:8 64:5,13 64:15,23 65:2 65:3 66:1 71:14 83:14,16 85:10 <b>secondary</b> 32:11 <b>section</b> 45:4,7,9	45:17,19 55:9 67:20 <b>secure</b> 75:8 <b>see</b> 2:21 19:11 28:12 35:4,6 44:8 50:19 55:1,23 56:7 56:15 57:7,18 72:19,21 75:3 77:8,14 78:17 78:22 83:4 84:7 88:10 90:6 <b>seek</b> 87:11 <b>seeking</b> 13:16 <b>seen</b> 29:24 79:12 <b>selling</b> 47:19 <b>semiprofessional</b> 19:13 <b>send</b> 29:25 64:2 <b>senior</b> 1:4 15:10 19:7 22:22 30:4 35:14 85:11 <b>seniors</b> 22:18 <b>sense</b> 4:25 6:24 34:25 <b>senses</b> 70:3 <b>sensitive</b> 13:21 <b>sentence</b> 49:6 73:3,9 74:25 <b>sentences</b> 75:3 <b>separate</b> 67:19 76:24 79:21 80:3 88:6,7 <b>September</b> 1:12 13:4 <b>sequence</b> 10:7 12:16 63:19,20 <b>series</b> 26:21 55:25 80:23 81:1 <b>serious</b> 36:19 44:22 47:9 49:18 61:24 72:3 <b>serve</b> 34:10 <b>Service</b> 5:1 <b>set</b> 50:23 71:12 80:6 <b>sets</b> 71:6 <b>shadow</b> 11:7 <b>share</b> 20:22 <b>shock</b> 6:21,24 <b>short</b> 40:7 78:20 <b>shortcomings</b> 74:2 <b>shortly</b> 12:17 <b>show</b> 1:25 20:15 52:8 <b>shown</b> 54:24 87:20 <b>shows</b> 9:25 <b>side</b> 37:17,21 62:17 82:19,20 <b>sides</b> 26:14
---	---	---	--	--	--	---	---

<b>sight</b> 59:19	<b>sorts</b> 43:14 69:15	63:4 64:5 68:9	<b>subjective</b> 80:1,4	37:8 41:22	15:22 17:4,12	10:21 13:7
<b>sign</b> 28:19	<b>sought</b> 2:16	68:17 70:17	<b>submission</b>	42:19,20 47:8	19:12,18,21	44:12,16,23
<b>signed</b> 40:16	45:13	71:1,5,5 72:22	38:14 41:7	69:4,18 70:14	22:5,13 23:23	47:24 49:7,25
<b>significance</b> 89:7	<b>source</b> 25:19	73:10 78:14	90:10	<b>talked</b> 57:23	24:2,5 25:7,18	57:16 59:15
<b>significant</b> 29:14	28:23 69:13,17	79:14,15,19	<b>submitted</b> 81:20	68:21 69:6,7,9	26:4,11,22	60:8 61:2,14
<b>silk</b> 86:10	69:23 70:10,12	80:5,10,19	<b>Subramanyam</b>	69:15 70:13	27:11,13,13,14	71:23,24 72:23
<b>similar</b> 65:24,25	70:15	81:20 82:16	30:21	<b>talking</b> 4:24	28:23 29:2,3	74:21 82:23
<b>similarities</b>	<b>sources</b> 2:13,19	83:1,5,6,9,25	<b>subsequent</b> 44:8	11:17 15:12	29:13 30:24	83:3 85:17
81:11	2:25 3:1,11	84:4,25	75:3	20:2 25:8	32:8,14,23	<b>Tomlinson</b> 79:11
<b>simple</b> 82:23	4:24 5:7,21	<b>statements</b> 78:21	<b>subsequently</b>	35:11 53:16,18	33:9 34:5,9	<b>tomorrow</b> 13:25
<b>simply</b> 81:17	18:18 31:6	<b>statute</b> 48:21	62:6	57:7 80:10	35:6 38:2,12	<b>top</b> 28:15,20
<b>sir</b> 6:13 8:21	33:1 49:25	<b>Staying</b> 65:8	<b>subtle</b> 20:19	<b>talks</b> 80:14	38:16 41:5	<b>totally</b> 44:23
13:3 23:10,11	50:12,17,25	<b>step</b> 10:4	<b>succeeding</b> 4:9	<b>Tamil</b> 30:21	43:11,13 47:23	47:9 50:2 51:9
23:13,20,22,23	51:14 53:19	<b>Stephen</b> 1:20	<b>successful</b> 30:23	<b>Tapsters</b> 25:7	49:15 50:13	59:8 61:2,17
24:18 26:1,6	68:18,20,24	<b>Stevens</b> 23:2,22	<b>suddenly</b> 61:4	<b>targeting</b> 66:20	52:24 53:3,3,8	88:6 89:12
26:10,20,24	69:2,16 70:24	23:23	<b>sufficient</b> 13:7	<b>tea</b> 20:6	54:7 55:5 57:5	<b>transcript</b> 78:15
27:6,14,17,22	<b>south</b> 11:3	<b>Stockwell</b> 27:16	<b>suggest</b> 49:10	<b>team</b> 5:9,11 7:5	57:9,10 58:13	<b>transport</b> 22:23
27:25 28:19	<b>speak</b> 13:8 32:23	<b>stories</b> 8:14	65:11 66:2	<b>Teare</b> 69:20	61:14 62:25	<b>trial</b> 14:8
41:6 90:9	<b>speaking</b> 3:1 6:3	14:21 15:3	80:20	76:13 78:16	63:8,21 64:1	<b>trick</b> 38:12
<b>site</b> 52:7 60:18	28:13 29:1	17:8,11 18:14	<b>suggested</b> 70:7	84:6,16,17,22	66:13 67:8,9	<b>trickery</b> 16:16
<b>situation</b> 3:6	56:24	18:16 26:21	<b>suggesting</b> 20:24	<b>tell</b> 16:17 37:25	68:10 75:20	16:17
8:22 42:3,4	<b>speaks</b> 53:22	27:25 28:22,24	65:25 66:3	41:2 45:13	78:9 82:13	<b>tried</b> 24:14
43:8,24 44:1,7	<b>specific</b> 55:14	29:1 32:3,5,21	88:16	48:2 52:18	83:7,18 85:9	<b>trouble</b> 53:25
45:9,21 72:4	<b>specifically</b>	32:23 34:16,17	<b>suggestion</b> 73:5	59:24 68:23	86:10,13 87:1	86:2
85:16,21	13:17 28:7	46:7 52:19	73:13 74:13	70:10 71:20	89:24,25	<b>true</b> 13:20 28:21
<b>six</b> 49:22	<b>spectacles</b> 39:1,2	88:22	<b>suggests</b> 25:22	86:11 87:4	<b>thinking</b> 10:13	69:19 74:19
<b>skeleton</b> 64:4	<b>speculate</b> 33:11	<b>story</b> 3:21 6:15	47:10 57:19	<b>telling</b> 16:12	10:25 12:13	80:12 83:7,9
68:12 77:6	86:19	6:22 7:22,22	69:16 81:2,4	25:17 43:5	36:4 45:23	87:13
78:21	<b>speculation</b> 3:23	8:14,22,23 9:3	<b>suitable</b> 1:22	58:3 62:19	49:16 50:6	<b>trumped</b> 60:20
<b>skirted</b> 82:18	<b>speech</b> 1:6,8,14	9:25 10:14,19	<b>Sunday</b> 31:24	71:22	53:11 72:6	62:3
<b>slide</b> 1:25	1:18,24	10:25 11:4	32:3 40:24	<b>tells</b> 56:11,14	78:12,13	<b>trust</b> 14:15,17,22
<b>slightly</b> 6:18,23	<b>spell</b> 75:2 82:25	13:6,18 14:3,4	<b>Superintendents</b>	72:1	<b>third</b> 49:6	14:25 15:19
13:11	<b>spoke</b> 3:3,6 25:4	14:11 16:10,12	1:5,11	<b>temporarily</b>	<b>thought</b> 8:24	16:10,11 19:16
<b>small</b> 1:9 2:18	45:6 67:9	16:19 17:1,20	<b>support</b> 32:16	63:22	18:6,9 48:1	20:9
19:22 29:10	<b>spoken</b> 25:15	18:6,8,13	<b>suppose</b> 30:5	<b>temporary</b> 64:6	49:24 61:2	<b>trust-building</b>
32:13	46:15	20:12,15 27:4	34:23 43:6	<b>tends</b> 32:16	83:20 85:18,20	20:7,25
<b>smelling</b> 68:6,6,8	<b>spotlight</b> 27:22	27:5 30:21	52:24 60:1	<b>term</b> 4:25 31:6	86:23 88:5	<b>truth</b> 40:18 71:5
<b>smoke</b> 69:12	<b>staff</b> 39:14	31:5,15 32:10	72:9 82:25	43:17 62:10	<b>threatening</b>	71:19,20,22
<b>sniff</b> 66:24	<b>stage</b> 3:20 9:25	32:11 33:9	<b>sure</b> 2:23 15:25	<b>terminology</b>	57:11	72:1 83:17
<b>social</b> 20:10	45:12 47:2	41:9,14,17	20:18 33:4	21:1	<b>three</b> 23:14	<b>try</b> 5:13 78:6
<b>Soham</b> 27:18	48:19 50:6	44:15 46:4	39:12 48:15	<b>terms</b> 7:16,17	24:15 82:6	87:11
<b>sole</b> 73:17	52:14 53:3,11	48:4,7 50:9,20	58:1,2 70:19	22:6 40:20	<b>Thursday</b> 67:18	<b>trying</b> 3:3 7:15
<b>solely</b> 10:10	56:9 57:5	52:15,16,20,23	79:19 82:2	58:14 63:19	69:21 71:1	11:12 12:4
<b>solicitors</b> 40:21	58:24 59:8	54:20 57:16	86:17 88:19	82:25	76:12	15:24 21:11
<b>solution</b> 38:13	60:11 61:6	58:4 60:8	<b>surprised</b> 53:10	<b>terror</b> 27:14	<b>tie</b> 51:2	29:3 37:17
<b>somebody</b> 43:3	62:14 73:25	62:19 81:24	<b>suspect</b> 82:20	<b>test</b> 14:15 50:21	<b>tight</b> 38:1	39:2 74:24
43:10 52:4,20	77:14 82:2	82:5,9 83:23	<b>suspects</b> 2:24	<b>textually</b> 75:16	<b>time</b> 10:4 11:6,8	76:14 88:13
69:25 70:5	<b>standard</b> 40:17	87:13,17 89:9	7:11 11:8	<b>Thank</b> 4:18	12:18 18:12	<b>Tuesday</b> 61:3
<b>somebody's</b>	<b>Standing</b> 22:25	<b>straight</b> 47:20	<b>suspicion</b> 37:1	38:17,19 39:4	28:15 52:5	<b>turn</b> 3:25 59:3
48:20 65:1	<b>start</b> 62:19	58:14	71:10	39:6,25 40:1	57:2 58:5 62:6	79:18
74:7	<b>started</b> 26:21	<b>strategic</b> 84:9	<b>sworn</b> 40:12	40:11 86:6,8	66:1 67:1	<b>turned</b> 53:1
<b>somewhat</b> 68:13	27:10,10 55:17	<b>stretch</b> 36:21	90:19,22	90:19,22	68:12 71:8	83:12
<b>son</b> 8:6,6	59:25 81:2,10	<b>striker</b> 30:21	<b>symbolic</b> 29:15	<b>they'd</b> 69:25	77:23 78:12,20	<b>turning</b> 54:12
<b>soon</b> 59:3,4 75:4	83:1	<b>striking</b> 72:15	<b>syntax</b> 73:9	<b>thing</b> 1:14 9:3,9	90:1	<b>turns</b> 64:11
<b>sorry</b> 6:12 7:15	<b>starting</b> 27:10	<b>string</b> 18:16	<b>systematically</b>	13:22 38:1	<b>times</b> 40:21,23	<b>two</b> 23:14 24:14
7:17,24 14:24	62:21	<b>strings</b> 22:3	80:22	48:1 56:14	40:24,24 46:8	40:20 42:25
15:15 27:9	<b>startling</b> 81:11	<b>strong</b> 2:24 54:5	<b>T</b>	87:7	48:3 53:7	55:14 64:22
33:15 46:21,24	<b>starts</b> 80:6,21	<b>strongly</b> 11:20	<b>table</b> 70:22	<b>things</b> 10:12	54:19 56:3	68:11 79:25
48:24 60:22	<b>state</b> 45:4 73:4	11:23	<b>take</b> 10:3 22:21	24:20 27:12	57:17 61:18	80:11 82:6
62:1 76:23	<b>statement</b> 1:4	<b>Stuart</b> 54:18	22:22 33:5	34:1,17 46:9	78:20 87:8,19	86:5 88:7,8
80:8 81:9 86:4	2:3 30:5 33:14	<b>student</b> 74:1	41:10 45:24	63:15 80:11	89:13 90:13	<b>type</b> 35:20
<b>sort</b> 9:20 13:16	40:16,17 41:11	<b>stuff</b> 9:20	46:14 77:18	86:5	<b>TNL</b> 40:22	<b>types</b> 35:13
22:6 35:15,16	49:7 51:24	<b>stupid</b> 71:25	80:2 87:1,7,12	<b>think</b> 1:10 3:2,3	<b>TNL's</b> 73:17	<b>typical</b> 68:22
35:17 41:20	53:4 54:15	<b>style</b> 70:24	<b>taken</b> 8:4 10:18	3:11,15,17,18	<b>today</b> 33:24 89:1	<b>typing</b> 74:4
65:24 76:19	55:8 57:7,15	<b>subject</b> 45:19	11:13 84:13	3:19 9:24 14:4	<b>today's</b> 73:4	
87:7	60:23 61:20	73:2	<b>talk</b> 22:4 24:14	14:10,19 15:9	<b>told</b> 6:3 7:14	<b>U</b>

<p><b>ulterior</b> 18:4  <b>Um</b> 5:2 20:4  <b>unacceptable</b>  44:23 47:9,12  61:2,18  <b>unauthorised</b>  3:1 15:4,21  16:22 17:11,14  18:19 20:2,22  21:23 22:4,8  25:19 31:12  65:2 71:9  73:15 74:18  75:1  <b>undeniably</b>  36:19  <b>undermine</b>  35:23  <b>understand</b> 3:6  8:12 11:10  12:21 21:15  37:2 41:13  43:2 51:25  59:17 70:11  76:9 78:9  89:12,21,21  <b>understandable</b>  69:18  <b>understood</b>  21:23 42:14  49:14 68:14  <b>undertake</b> 60:21  <b>undertaking</b>  54:19 55:2  <b>undoubtedly</b>  61:22  <b>unethical</b> 15:2  47:12,14,15  <b>unfortunately</b>  26:20,23 31:18  31:20  <b>unhappy</b> 86:13  <b>university</b> 74:2  75:6,7,7  <b>unknown</b> 47:7  <b>unlawfully</b> 63:23  83:1  <b>unofficial</b> 2:12  2:19,25 18:18  <b>unpleasant</b>  27:17  <b>upfront</b> 60:5  <b>urgent</b> 68:14  <b>use</b> 4:25 20:25  43:25 50:24  62:9 74:8,17  <b>useful</b> 24:12  <b>usually</b> 24:7  <b>utterly</b> 47:11</p> <hr/> <p style="text-align: center;"><b>V</b></p> <p><b>value</b> 39:20 78:5  <b>various</b> 39:3  69:7 71:12  <b>vary</b> 18:19,20,20  <b>vast</b> 41:3</p>	<p><b>ventured</b> 68:16  <b>verbatim</b> 75:10  <b>verified</b> 71:5  <b>versa</b> 23:21  <b>version</b> 4:15 83:7  83:9 84:10  <b>vice</b> 23:21  <b>view</b> 11:22 18:24  19:21 31:9  42:13 80:2  84:13,17 86:25  88:7  <b>views</b> 11:14 64:8  88:6  <b>virtually</b> 61:5  <b>volunteered</b>  34:18</p> <hr/> <p style="text-align: center;"><b>W</b></p> <p><b>waived</b> 60:2  <b>want</b> 3:10 10:17  13:19,22 16:1  16:9,17 20:7  22:4 25:15  26:18 33:2,24  39:7 40:4 63:9  81:22,23 85:15  <b>wanted</b> 2:1,23  3:18 4:2 10:5  13:19 16:18  37:19 61:15  <b>wanting</b> 21:25  80:13  <b>wants</b> 21:16 38:1  <b>war</b> 28:14,21  <b>warm</b> 23:20  <b>warrant</b> 49:18  49:19  <b>wasn't</b> 7:17 12:4  13:18 25:17  26:3 27:1,1,9  27:24 29:16  32:20 37:11  47:1 49:12  51:17 53:11  62:10 65:5,7  69:13 70:19  75:19,24 86:2  <b>watchdog</b> 27:19  <b>water</b> 52:21 60:9  62:10  <b>way</b> 2:7,18 3:5  4:4 6:1 8:25  10:9 12:17  15:1 18:1  19:23,25 20:4  20:9 22:4,14  26:5 28:14  29:4 30:1 33:2  35:21 38:2  46:16 48:3  49:4 50:15  59:11 65:2  68:23 79:10  83:23 85:2  86:7 87:18</p>	<p>88:22 90:12  <b>ways</b> 77:17 90:6  <b>web</b> 55:24  <b>Wednesday</b> 53:6  <b>week</b> 13:15  <b>weeks</b> 2:8 36:4  55:16 64:20  <b>weight</b> 49:12  <b>well-founded</b>  74:16 75:19,24  <b>well-known</b>  17:12  <b>went</b> 61:5 76:6  80:19  <b>weren't</b> 37:18  62:21 68:7  74:11  <b>we'll</b> 4:17 79:18  84:14 86:10  90:10  <b>we're</b> 15:19 25:8  30:5,16 34:23  34:24 56:25  64:22,23 65:23  77:5,6 81:18  86:7,7  <b>we've</b> 12:19 20:1  29:21 30:20  31:21 41:9  89:25  <b>white</b> 9:20 63:9  63:10 66:10  85:23  <b>wholly</b> 62:15,16  62:17,24 63:18  <b>win</b> 19:24 60:5  <b>wine</b> 29:20,21,23  29:24  <b>wish</b> 13:25 21:18  30:15 86:16  87:12 89:14  <b>wishes</b> 20:5  <b>witness</b> 4:14 7:16  40:10,16 60:23  64:5 68:9,16  71:5 72:22  73:10 78:21  79:14,15 82:16  82:25 83:5,6,9  83:25 84:4  <b>witnesses</b> 7:11  <b>woman</b> 18:1  <b>won</b> 77:9 83:13  83:14,16  <b>wonder</b> 59:22  71:21  <b>word</b> 43:25 74:8  74:17 75:20  <b>words</b> 45:18  47:12 53:25  <b>work</b> 81:13,13  84:16  <b>worked</b> 41:2  46:25 47:10  81:15 84:19,22  <b>working</b> 26:13</p>	<p>40:20 41:14,18  46:4 50:14,16  50:25 51:5,7  63:14  <b>works</b> 20:13 38:4  <b>world</b> 18:25  38:23  <b>worse</b> 34:14 87:3  <b>worth</b> 43:5  <b>wouldn't</b> 3:4 6:2  22:21,23 25:23  29:19,23 32:20  32:22 47:23  48:10,10 58:20  62:4 70:14,16  88:15  <b>Wright</b> 1:3 4:11  20:18 21:15  28:21 30:2  33:13 40:1  <b>write</b> 3:25 4:3  8:16 16:3,10  16:11,13 17:1  26:5 28:22  29:1 39:10  69:6  <b>writing</b> 15:6  71:2  <b>written</b> 5:3  18:14 25:8,9  32:5,8 35:1  82:2  <b>wrong</b> 31:9,20  31:24 34:2,9  57:14 63:15  69:1 85:17  87:2,9  <b>wronged</b> 87:10  <b>wrongly</b> 78:25  79:20  <b>wrote</b> 4:15 5:4  6:14 11:5 26:2  37:8 73:25</p> <hr/> <p style="text-align: center;"><b>Y</b></p> <p><b>Yard</b> 6:8,14 19:7  23:12 24:13  28:15 29:22,25  31:17  <b>Yates</b> 29:18  <b>year</b> 24:4,5,7,12  29:15  <b>years</b> 4:9 17:15  18:15 21:14  24:7 25:1 26:4  27:7 30:13  35:10 40:22  64:17 86:22  87:19 89:13  90:13  <b>yesterday</b> 39:22  57:9  <b>yield</b> 21:3</p> <hr/> <p style="text-align: center;"><b>Z</b></p> <p><b>Z</b> 62:20</p>	<p style="text-align: center;"><b>0</b></p> <p><b>07735</b> 33:14</p> <hr/> <p style="text-align: center;"><b>1</b></p> <p><b>1</b> 48:17 54:7 65:4  71:2,6 72:6  81:1  <b>10</b> 23:15 45:3  67:20 90:24  <b>11</b> 23:15  <b>12</b> 49:7 54:21  55:9 61:7,19  80:21  <b>13</b> 49:22  <b>13461</b> 49:23  <b>14</b> 1:4 26:3  <b>15</b> 81:9,10  <b>16</b> 54:15  <b>18</b> 2:3 55:8,13  <b>19</b> 18:15 90:25  <b>1977</b> 40:21  <b>1990</b> 62:7  <b>1997</b> 1:12 2:5  17:7</p> <hr/> <p style="text-align: center;"><b>2</b></p> <p><b>2</b> 63:22 68:11  71:7 72:6 73:8  <b>2.00</b> 1:2  <b>20</b> 41:14 45:5  57:15 60:3  81:25  <b>20th</b> 56:7  <b>2000</b> 23:4  <b>2004</b> 26:3,11  <b>2005</b> 17:24 23:4  23:16,17,17  27:12,13  <b>2006</b> 27:7,9,17  <b>2007</b> 4:12 14:4  14:12 25:7,9  <b>2008</b> 28:17  <b>2009</b> 41:14  <b>2010</b> 13:5 40:22  <b>2012</b> 90:25  <b>21</b> 58:6  <b>23</b> 30:4  <b>24</b> 80:16  <b>27</b> 53:14,22 64:1  65:8  <b>27th</b> 56:7,16  <b>28</b> 55:4 64:9  78:15  <b>28th</b> 56:15 79:4</p> <hr/> <p style="text-align: center;"><b>3</b></p> <p><b>3</b> 55:2 72:2 75:12  <b>3.02</b> 40:6  <b>3.12</b> 40:8  <b>31</b> 33:13,16  <b>32</b> 86:22  <b>33</b> 40:21 89:13</p> <hr/> <p style="text-align: center;"><b>4</b></p> <p><b>4</b> 57:20 58:5</p>	<p><b>4.28</b> 90:23  <b>47</b> 71:3  <b>48</b> 78:14 84:5  <b>49</b> 73:9</p> <hr/> <p style="text-align: center;"><b>5</b></p> <p><b>5</b> 40:17  <b>50,000</b> 39:14  <b>51</b> 72:18,18 73:3  <b>55</b> 45:4,7,9,17,19  <b>56</b> 68:15 70:3  80:9</p> <hr/> <p style="text-align: center;"><b>6</b></p> <p><b>6</b> 25:7</p> <hr/> <p style="text-align: center;"><b>7</b></p> <p><b>7</b> 4:20  <b>7/7</b> 26:20</p> <hr/> <p style="text-align: center;"><b>8</b></p> <p><b>8</b> 4:12 25:9 41:11</p> <hr/> <p style="text-align: center;"><b>9</b></p> <p><b>9</b> 44:16,21 80:6  80:15  <b>9.00</b> 64:3</p>
---	---	--	--	--	---