

<p>1 2 (2.00 pm) 3 MR JAY: Sir, we are in a position to hear from Mr Lewis 4 this afternoon, but after Mr Owens. Mr Thomas we're now 5 hearing on Friday of next week, that's 9 December, the 6 whole day. 7 LORD JUSTICE LEVESON: Yes. Does that cause any insuperable 8 concern to anybody who would otherwise be here? I'm not 9 saying that will provide a trump, but I'm asking the 10 question. (Pause) 11 Thank you. Oh, yes? 12 Discussion re procedure 13 MR CAPLAN: It's not about next Friday, but there was 14 another matter you wanted me to deal with -- 15 LORD JUSTICE LEVESON: That's fine. 16 MR CAPLAN: -- before we rose and again this morning you 17 asked me to consider with my clients the issue of the 18 article that was published in the Daily Mail concerning 19 Mr Grant. 20 LORD JUSTICE LEVESON: Yes. 21 MR CAPLAN: I've had an opportunity to consider that over 22 the interval and can I just then please explain the 23 position and what it is that I am proposing? 24 Before I do that, can I just remind you of the 25 context in which the article which Mr Sherborne and</p> <p style="text-align: center;">Page 1</p>	<p>1 woman". The second was an inference. 2 As to the first, the McMullan conversation, that is 3 not something, of course, that Mr Grant had checked with 4 Mr McMullan and we've had Mr McMullan's evidence that he 5 had been misinterpreted by Mr Grant if -- 6 LORD JUSTICE LEVESON: Yes -- all right. 7 MR CAPLAN: It is important that I put the context, if 8 I may. 9 LORD JUSTICE LEVESON: All right. 10 MR CAPLAN: As to the second, the question of the means by 11 which the story came to be written concerning 12 Jemima Khan and the lady in question, sir, that, as 13 I said at the time, is a matter which will be the 14 subject of evidence which we will produce to the 15 Inquiry. 16 LORD JUSTICE LEVESON: Yes. 17 MR CAPLAN: But we categorically deny that on either basis 18 there is any evidence that Associated Newspapers has 19 ever hacked phones. 20 LORD JUSTICE LEVESON: That's a matter for discussion and 21 potential evidence. 22 MR CAPLAN: It is. 23 LORD JUSTICE LEVESON: But the criticism that Mr Sherborne 24 was making and the concern that I expressed was the one 25 sentence in the report. If one reads precisely what he</p> <p style="text-align: center;">Page 3</p>
<p>1 Mr Grant complain about was published, and the context 2 was Mr Grant's evidence to you, sir, in which he made, 3 as we know, allegations that Associated Newspapers had 4 been involved in phone hacking -- 5 LORD JUSTICE LEVESON: Yes, it's Day which? 6 MR CAPLAN: It is 21 November. 7 MR SHERBORNE: It's Monday afternoon, sir. 8 LORD JUSTICE LEVESON: Yes, I know, but -- 9 SPEAKER: Day 4. 10 LORD JUSTICE LEVESON: Thank you very much. 11 MR CAPLAN: Those were not allegations which he certainly 12 had made to Associated Newspapers previously, and so 13 they came to be made in a very public setting on the 14 first day of evidence to your Inquiry. 15 LORD JUSTICE LEVESON: Yes -- 16 MR CAPLAN: There were two broad strands to those 17 allegations. Firstly, that Mr Grant said they were 18 supported by evidence which was to be found in 19 a conversation he had covertly recorded with 20 Mr McMullan, and the second strand was an inference 21 which he drew as to the means by which an article was 22 published by my clients concerning the period when he 23 was with Jemima Khan -- 24 LORD JUSTICE LEVESON: Yes. 25 MR CAPLAN: -- and the relationship with a "plummy-voiced</p> <p style="text-align: center;">Page 2</p>	<p>1 said, he was asked: 2 "Are you suggesting that this story must have come 3 from phone hacking?" 4 And then he tells the story and then says: 5 "Thinking about how they could possibly come up with 6 such a bizarre leftfield story, I realised ..." 7 et cetera. 8 Then it was put to him: 9 "You haven't alleged that before, have you, in the 10 public domain? 11 "Answer: No. But when I was preparing this 12 statement and going through all my old trials and 13 tribulations with the press I looked at that one again 14 and thought 'That's weird', and then the penny dropped." 15 Mr Jay said: 16 "I think the highest it can be put is frankly it's 17 a piece of speculation on your part, isn't it, in 18 relation to this? 19 "Answer: Yes, you could, yes, speculation, okay, 20 but I'd love to know, I mean, I think Mr Caplan who 21 represents Associated was saying earlier today he would 22 like to put in a supplementary statement and, you know, 23 referring to the things I say today. Well I'd love to 24 hear what the Daily Mail's and Sunday Mail's explanation 25 of that article is, what the source was, if it wasn't</p> <p style="text-align: center;">Page 4</p>

<p>1 phone hacking." 2 And then he says: 3 "I'll leave that for now." 4 And it's abundantly clear what Mr Grant was doing. 5 He was preparing for this hearing, he decided that the 6 facts led to an inference, you challenged the inference 7 and that's perfectly permissible, and if it's necessary 8 that's something I can think about, but more 9 significantly, the article of which he complains is that 10 the allegations are "mendacious smears" driven by his 11 hatred of the media. 12 And the word that Mr Sherborne focused on and the 13 word that I took issue with at the time was the word 14 "mendacious". You may say Mr Grant doesn't like the 15 media, I don't suppose he would disagree with that for 16 one moment in this context, perhaps he would, perhaps he 17 wouldn't, I don't know, I'm not going to put words into 18 his mouth. That's not appropriate. But the clear 19 allegation is this was deliberately dishonest. 20 Now, either you want to support that, or you don't. 21 MR CAPLAN: Might I just refer to another passage in the 22 evidence? I think the reference is page 27, line 21. 23 Mr Jay said: 24 "But there is no evidence that you have to your 25 personal knowledge that the Mail was involved in this at Page 5</p>	<p>1 was any intention to intimidate a witness. There was 2 every intention to respond to a serious allegation of 3 criminality, which received very widespread publicity. 4 Sir, I understand in effect the phrase which you 5 have focused on, and can I suggest this. What we are 6 suggesting is that we will be calling evidence in 7 relation to the second strand of the evidence, and I use 8 that in inverted commas, which Mr Grant referred to. In 9 order solely to assist the smooth running of your 10 Inquiry, may I stress that, to assist the smooth running 11 of your Inquiry, we are prepared for the moment, and may 12 I stress those words, to remove the phrase "mendacious 13 smears" from the online copy of the Daily Mail. That 14 will be done pending the evidence being called before 15 you. 16 Sir, I do say with respect that what you are asking 17 us to do is to remove copy from a newspaper in 18 circumstances where, really, we are not a court dealing 19 with whether this is comment or opinion, we're not 20 dealing with defamation proceedings. We are dealing 21 with an Inquiry. I fully understand the importance of 22 ensuring that those that are called before it are not 23 intimidated, that those that are called before it do not 24 feel that their evidence is going to be met with 25 vilifying comments thereafter, but, sir, in our Page 7</p>
<p>1 all, is there?" 2 And he says: 3 "I'm asking you to be very careful when you answer 4 the question. Don't share a speculation with us, don't 5 share an opinion. We're looking for evidence. There 6 isn't any evidence, is there?" 7 "Answer: The evidence for the Daily Mail being 8 involved in phone hacking for me would be the article we 9 spoke about earlier, the plummy-voiced woman, and it 10 would be Paul McMullan's answer to this question." 11 LORD JUSTICE LEVESON: Paul McMullan's answer has been 12 explained, but in any event whether you could draw that 13 inference from what was recorded on the tape is another 14 question, and the other evidence is the inference which 15 judges frequently draw from circumstantial evidence. 16 I'm not saying it's right, I'm not saying it's wrong. 17 What I am saying is that it seems to me, and I wasn't 18 sure that you or your clients disagreed at the time that 19 it was appropriate to characterise that allegation as 20 "mendacious". 21 MR CAPLAN: Can I come to the point, I hope, of my 22 submissions to you? 23 LORD JUSTICE LEVESON: Yes. 24 MR CAPLAN: Can I say straight away, there never was any 25 intention to interfere with this Inquiry and there never Page 6</p>	<p>1 respectful submission there is a context to this. It's 2 far better that the evidence is called and, as I say, to 3 assist you we will remove that for the moment from the 4 database. 5 LORD JUSTICE LEVESON: I understand. As to the argument 6 between Mr Grant and Associated Newspapers as to what 7 they wrote about him, there are ample mechanisms 8 available to Mr Grant to deal with that in such way as 9 he believes are appropriate and for you to respond. I'm 10 not doing that. I am concerned about the very feature 11 that you've mentioned. 12 Now, to some extent we've moved beyond it and I took 13 comfort from the way you responded to my proposition to 14 you, and I didn't press you because of the very reasons 15 you've identified, and I'm sure you understand. But it 16 was the suggestion that that sort of response might 17 impact on others who were coming to give evidence. 18 That's my concern. 19 I'm not seeking to debate the merits of this 20 conversation, neither am I seeking to decide what is an 21 appropriate inference or isn't an appropriate inference, 22 although I made it abundantly clear what I did not 23 think, based on that material, was appropriate so that 24 I could lend some force to the concern that this might 25 be thought of as intimidatory. You made it clear that Page 8</p>

<p>1 it wasn't intended to be, and, as I say, I believed that 2 the word had come out. I was clearly wrong in that 3 regard. Had I not believed it, I would have had this 4 conversation with you last week. 5 MR CAPLAN: Sir, thank you very much. 6 LORD JUSTICE LEVESON: Right. Mr Sherborne? 7 MR SHERBORNE: Sir, as you can imagine, for Mr Grant -- I'm 8 not sure I missed -- I don't think there was an apology 9 buried deep in Mr Caplan's plea in mitigation, but if 10 you want an example of the culture, practices and 11 ethics, you have it. 12 LORD JUSTICE LEVESON: I'm there, Mr Sherborne. 13 MR SHERBORNE: Can I say this, and you'll appreciate why 14 I say this because Mr Grant would like his right of 15 reply to that. He won't exercise the right of attack, 16 which is what Associated did, but the distinction, which 17 I would emphasise again, between Mr Grant's evidence 18 being mistaken or wrong, which is no doubt what 19 Associated suggest, and I can leave that to be dealt 20 with when the evidence is called, and what he was 21 accused of is one which you will find in any dictionary, 22 and I would recommend that Associated Newspapers' editor 23 or its legal department consult one rather more quickly 24 than they have come back with their explanation. 25 LORD JUSTICE LEVESON: All right.</p> <p style="text-align: center;">Page 9</p>	<p>1 mind and character to carry on, whatever impact that 2 evidence all has. I'm not judging the issue. 3 MR SHERBORNE: I understand that, sir. 4 LORD JUSTICE LEVESON: Right. Thank you very much indeed 5 MR JAY: Sir, the next witness is Mr Alexander Owens. 6 LORD JUSTICE LEVESON: Thank you. 7 MR ALEXANDER OWENS (sworn) 8 Questions from MR JAY 9 MR JAY: Mr Owens, I'm going to invite you to sit down and 10 make yourself comfortable and also I'm going to hand 11 three files which contain relevant material, including, 12 I hope, your two witness statements. 13 Your full name, please? 14 A. Alexander John Owens. 15 LORD JUSTICE LEVESON: Mr Owens, thank you for coming 16 forward. I think you came forward to us on the basis 17 that you had some valuable information and I'm grateful 18 to you. 19 A. I would hope so, sir. 20 MR JAY: First of all, Mr Owens, if I could identify your 21 two witness statements. In the first of the three files 22 under, I hope, tab 1, there's a statement which runs to 23 20 pages signed by you on 17 November; is that correct? 24 A. That's correct. 25 Q. And you've signed the statement of truth?</p> <p style="text-align: center;">Page 11</p>
<p>1 MR SHERBORNE: It's very important for me to say that as 2 regards Mr McMullan, as you said yourself, the 3 transcript of what he said to Mr Grant when he didn't 4 realise that he might be quoted later, as opposed to 5 giving his evidence here, is very clear for all to read 6 and I can make submissions in due course about it. 7 LORD JUSTICE LEVESON: Yes. I don't want this debate to 8 become totemic. Do you understand what I mean? 9 MR SHERBORNE: I do understand. 10 LORD JUSTICE LEVESON: I understand that you will argue that 11 it's illustrative and Mr Caplan will have understood 12 that at a very early moment, which is why he dealt with 13 it as he dealt with it on the last occasion. But it's 14 all material which we will consider in due course 15 without my making a finding of fact one way or the 16 other, because I can't start going into that sort of 17 territory. 18 MR SHERBORNE: Sir, I understand that, but you will recall 19 that it wasn't just me who rose on Tuesday morning to 20 deal with this. Mr Garnham did as well. 21 LORD JUSTICE LEVESON: No, I understand. 22 MR SHERBORNE: It carries implications well beyond Mr Grant, 23 as you'll appreciate. 24 LORD JUSTICE LEVESON: I understand. And I am conscious 25 that those who followed Mr Grant had the strength of</p> <p style="text-align: center;">Page 10</p>	<p>1 A. I have, yes. 2 Q. This is your main evidence, but there's also a short 3 supplementary statement where you expand upon and deal 4 with certain recent events, signed and dated by you on 5 22 November? 6 A. That's correct, sir. 7 Q. You tell us between the years 1999 and 2005 you were the 8 senior investigating officer with the Information 9 Commissioner's office based in Winslow; is that right? 10 A. Yes. 11 Q. Can I ask you, please, about your previous career. It 12 was in the police, wasn't it? 13 A. Yes. I basically left school and joined the police 14 cadets when I was 17. As 19, I became a constable and 15 basically stayed there until I'd finished my 30 years in 16 and out of various police departments. So I actually 17 retired in October 1995. 18 Q. Thank you. And then you -- you haven't said your rank. 19 You retired -- 20 A. Sorry, I retired in the rank of detective inspector. 21 Q. Thank you very much indeed. Following your retirement, 22 the ICO, as we're calling it, didn't exist then. There 23 was some other entity in being, I think, called the Data 24 Protection Registrar's Office? 25 A. Yes.</p> <p style="text-align: center;">Page 12</p>

<p>1 Q. You joined them in 1997?</p> <p>2 A. As an investigator on a two-year fixed contract.</p> <p>3 Q. The legislation was underfoot, it eventually became law</p> <p>4 in 2000 in the form of the Data Protection Act 1998?</p> <p>5 A. There was legislation in place. The 1984 Act. And yes,</p> <p>6 I basically joined because the new Act was coming in.</p> <p>7 Q. Thank you. The time when you joined -- or you joined in</p> <p>8 September 1999. You became senior investigating officer</p> <p>9 in December 1999. The department consisted of seven or</p> <p>10 eight regional investigating officers around the whole</p> <p>11 of the United Kingdom?</p> <p>12 A. That's correct.</p> <p>13 Q. Two full-time investigators based at Winslow. One of</p> <p>14 them was you, of course, the other was Ms Jean Lockett,</p> <p>15 who was head of --</p> <p>16 A. No, there were two other investigators and myself as the</p> <p>17 ICO, so there were actually two investigators plus</p> <p>18 myself plus Jean Lockett.</p> <p>19 Q. Was your direct line manager Mr Francis Aldhouse?</p> <p>20 A. He was, yes.</p> <p>21 Q. Who was the deputy commissioner and above him of course</p> <p>22 the commissioner?</p> <p>23 A. Correct.</p> <p>24 Q. Can we launch then straight into the circumstances</p> <p>25 surrounding Operation Motorman?</p> <p style="text-align: center;">Page 13</p>	<p>1 outwith the remit of Operation Re-proof?</p> <p>2 A. That's right.</p> <p>3 Q. Can we cover with more precision, rather than me just</p> <p>4 lead this evidence, the events of 11 and 12 November</p> <p>5 2002. Did you accompany officers of Devon and Cornwall</p> <p>6 Police to execute a warrant which they had obtained?</p> <p>7 A. Yes, I did, together with the regional officer for that</p> <p>8 area, Steve Gazzard.</p> <p>9 Q. Thank you. The raid was an address in south London; is</p> <p>10 that correct?</p> <p>11 A. I can't remember the exact address, but yes, I think it</p> <p>12 was down there somewhere.</p> <p>13 LORD JUSTICE LEVESON: All this is preliminary to the</p> <p>14 relevant search, isn't it?</p> <p>15 MR JAY: Yes.</p> <p>16 LORD JUSTICE LEVESON: So I think we can probably take it</p> <p>17 comparatively briefly.</p> <p>18 MR JAY: Thank you.</p> <p>19 Did you find any documents during the course of the</p> <p>20 search?</p> <p>21 A. Yes. I was obviously walking around and having a look</p> <p>22 while we weren't actually seizing documents and on one</p> <p>23 desk I saw a couple of bundles of documents which</p> <p>24 obviously related to vehicle registration marks, car</p> <p>25 numbers. And as I glanced down at them, I could see</p> <p style="text-align: center;">Page 15</p>
<p>1 A. Certainly.</p> <p>2 Q. This is paragraph 3.1 of your statement. You were</p> <p>3 contacted in September or October 2002 by Devon and</p> <p>4 Cornwall Police who were conducting an investigation</p> <p>5 which they had labelled Operation Re-proof; is that</p> <p>6 correct?</p> <p>7 A. That's correct.</p> <p>8 Q. What in essence were they investigating, Mr Owens?</p> <p>9 A. They were doing an Internet investigation into possible</p> <p>10 leaks from the police national computer to a private</p> <p>11 detective agency by both serving police officers and</p> <p>12 retired police officers.</p> <p>13 Q. Yes. Mr Owens, you're facing competition from</p> <p>14 a helicopter outside and also the microphone there</p> <p>15 doesn't really amplify your voice, so please keep it up.</p> <p>16 A. Certainly.</p> <p>17 Q. Thank you very much. You mentioned a private detective</p> <p>18 agency. That is Data Research Limited, who were based</p> <p>19 in south London?</p> <p>20 A. That's correct. I don't know the exact area, I can't</p> <p>21 remember it now, but it was down south London.</p> <p>22 Q. So the upshot was that the Devon and Cornwall Police</p> <p>23 wanted to execute a search warrant in pursuit of their</p> <p>24 investigation but it was agreed that your office would</p> <p>25 come and assist in case there were matters which fell</p> <p style="text-align: center;">Page 14</p>	<p>1 that there was an awful lot of vehicles with the</p> <p>2 personal owners' details on the same documents. And</p> <p>3 I asked one of the police officers if he'd seize it for</p> <p>4 me.</p> <p>5 Q. Yes. Those documents were given a particular exhibit</p> <p>6 number, but then did you telephone DVLA at Swansea to</p> <p>7 make further enquiries?</p> <p>8 A. Yes, I was still in the premises when I rang DVLA</p> <p>9 Swansea and basically gave them the first 10 or 12 on</p> <p>10 the list and asked them if they could -- was there any</p> <p>11 common denominator, could they check them?</p> <p>12 Q. And the upshot was that there was a common denominator,</p> <p>13 one particular DVLA employee who had conducted the</p> <p>14 searches?</p> <p>15 A. Well it all came down to one DVLA employee, but also the</p> <p>16 times and dates on the documents corresponded exactly</p> <p>17 with the times and dates on the DVLA records that they</p> <p>18 were checked.</p> <p>19 Q. Yes.</p> <p>20 A. So it was obviously that data research, either directly</p> <p>21 or indirectly, had a corrupt source within DVLA.</p> <p>22 LORD JUSTICE LEVESON: And that for you is critical because</p> <p>23 this is data protection. This is exactly what you're in</p> <p>24 the business to look for?</p> <p>25 A. Correct, sir, yes.</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 MR JAY: That person was immediately suspended by DVLA. 2 A. Yes. 3 Q. And in paragraph 3.5 of your statement, if we could take 4 the story slightly further forward, the exhibit bundle 5 you've mentioned, PS28, identified the fact that several 6 hundred VRMs had been checked by Data Research Limited 7 and the results subsequently sold on to about 10 8 companies and individuals? 9 A. Yes, that would be right. Yes. 10 Q. So Operation Motorman started on the back of -- 11 A. On the back of those documents and Operation Motorman 12 essentially was to identify any corrupt sources in the 13 DVLA and identify the customers that were on that -- the 14 list and what they wanted the details for. That was the 15 basis of Operation Motorman. 16 Q. Thank you. If I can take this quite briefly, a second 17 source was in fact identified but he was deceased by 18 then? 19 A. Yes, it was when we went to DVLA, we found out there was 20 a second source, but he'd died some nine months earlier. 21 Q. Can you help us with the protected number you refer to 22 in paragraph 3.8? 23 A. Yes. 24 Q. What's the significance of that? 25 A. I received a telephone call from a Mr Wilf Morgan, who</p> <p style="text-align: center;">Page 17</p>	<p>1 that means, so it started -- gave me concerns. 2 Q. Yes. 3 A. And we subsequently identified that that was in fact an 4 undercover car being used by the Metropolitan Police. 5 The Metropolitan Police confirmed it. Once they told us 6 that, we didn't ask any more details. 7 Q. What you did do is look further into Mr Whittamore and 8 ascertained that he ran a private detective business 9 from an address, his home address in Hampshire? 10 A. That's correct. 11 LORD JUSTICE LEVESON: And you went to him because he was 12 the person who asked for the information about the 13 protected number? 14 A. On the list going back to PS28, which is the 700 list, 15 we were able to identify from that the name Whittamore 16 and then it moved on. 17 MR JAY: There's another raid, this time Mr Whittamore's 18 home address in Hampshire. 19 A. Yes. 20 Q. Takes place on 8 March 2003? 21 A. Yes. 22 Q. This time it's under the aegis of the ICO, not a police 23 raid? 24 A. No, a search warrant issued under the Data Protection 25 Act.</p> <p style="text-align: center;">Page 19</p>
<p>1 was a very senior member of the DVLA, asking if we could 2 liaise and sort of work between us, and I was down 3 there, we were talking, and his phone rang and it turned 4 out that there was a young lady from -- I can't remember 5 which office, but it was the same office as the 6 deceased, who said that she shared a desk diary with 7 Mr Morgan and she'd noticed this long list of vehicle 8 registration marks in that diary -- 9 LORD JUSTICE LEVESON: I think you don't mean Mr Morgan, you 10 mean the deceased. 11 A. Yes, sorry, the deceased. There was a long list of 12 numbers in there so we went over -- I think it was 13 Wimbledon or that area -- we went over to their office 14 in Wimbledon and took possession of the diary from the 15 lady. 16 MR JAY: Yes. And that eventually led you, or maybe quite 17 quickly, led you to a particular investigator, 18 Steve Whittamore; is that right? 19 A. Well, it was noticing the protected number that actually 20 led us there. I was -- we were obviously going through 21 it, they were obviously relevant to our 22 Operation Motorman, when we noticed one of the vehicles 23 had -- or one of the vehicle marks written down in the 24 diary had very clearly next to it, "Protected number". 25 As an ex-Special Branch officer, I know exactly what</p> <p style="text-align: center;">Page 18</p>	<p>1 Q. It may be there were some police officers there to help? 2 A. No. The only time we used police officers is basically 3 as a matter of courtesy we let them know we're on their 4 area and we might ask for a uniformed officer to be 5 there when we enter, so to prevent a breach of the 6 peace, but we don't actually use police officers on the 7 actual searches and that. 8 Q. Mr Thomas subsequently described the documentation you 9 seized as a Pandora's box. 10 A. Yes. 11 Q. Which may well be an accurate description. But in terms 12 of what it was, the underlying information which was 13 being sought and obtained, as you say in paragraph 4.2, 14 ranged from CRO checks, which of course are criminal 15 record checks, vehicle registration mark checks, 16 ex-directory telephone numbers, mobile phone numbers, 17 telephone number conversions -- what do you mean by 18 that, Mr Owens? 19 A. A number conversion is basically, "Here's the number, 20 get me the name and address", or, "Here's the name and 21 address, get me the number". 22 Q. And family and friends' lists. Mr Whittamore made it 23 clear to you, did he, that he would co-operate as 24 regards his own wrongdoing, as it were, but wouldn't 25 incriminate any member of the press?</p> <p style="text-align: center;">Page 20</p>

<p>1 A. Yes. He didn't say anything then formally, but he 2 indicated that he wouldn't deny his wrongdoing, but 3 please don't ask him about the press because he's not 4 going to say anything about them.</p> <p>5 Q. Can I ask you, please, about the notebooks you seized. 6 This is on the sixth page of your statement.</p> <p>7 A. Yes. There were four I think it's A4 size hardback 8 notebooks and they are quite distinctive because they 9 are all different colours, they are blue, red, green and 10 yellow, and they contained somewhere in the region of 11 17,500 entries, if you can imagine an entry each line, 12 and along with that an awful lot of paperwork.</p> <p>13 But the actual notebooks represented all the work he 14 had done identifying which reporter, from which 15 newspaper. So -- and we'd have a reporter -- we'd have 16 the newspaper, the name of the reporter, the request 17 being made might be, "Can you check this car number out 18 for me?" All the way down.</p> <p>19 Q. Thank you. In relation to a telephone number, what was 20 the nature of the request? "Please find the telephone 21 number for X?", was it?</p> <p>22 A. It was just basically we'd have a name and address and 23 he'd have ex-directory, so we'd be searching for an 24 ex-directory number, or name and address and mobile, 25 depending on what the enquiry was.</p> <p style="text-align: center;">Page 21</p>	<p>1 sending the "I need paying for this". So all of them 2 relating to the one victim.</p> <p>3 And of course the books were in the middle of this 4 because we could match them with the papers, and it 5 went -- we could identify the newspaper, the journalist, 6 Whittamore, who he used, the little tracers, as I'd call 7 them, the blaggers, the corrupt people, and we had 8 a paper chain right the way up and down on --</p> <p>9 Q. Yes?</p> <p>10 A. -- well, eventually quite a lot, but that was the sort 11 of documentation I showed.</p> <p>12 Q. Can I just check two issues. The invoice of course is 13 going from Mr Whittamore back to the newspaper.</p> <p>14 A. Yes.</p> <p>15 Q. Did you see an invoice which matched some of the entries 16 in the notebooks?</p> <p>17 A. Yes.</p> <p>18 Q. The next question: Did you see any remittance advice or 19 similar document --</p> <p>20 A. Yes.</p> <p>21 Q. -- back from the newspaper which is evidence of payment?</p> <p>22 A. Yes.</p> <p>23 Q. The last point. You mentioned the blaggers. These are 24 the individuals working, as it were, beneath 25 Mr Whittamore on his instructions. Did the notebook</p> <p style="text-align: center;">Page 23</p>
<p>1 Q. Was there also a column which described the amount that 2 Mr Whittamore was going to receive for a particular job? 3 Or was that in other documentation?</p> <p>4 A. No, it was in the same -- no, it was in the same 5 document. It was the very last entry where he'd have 6 the amounts that he'd charged for each entry. I'm 7 trying to think. Yes, I'm almost certain of that.</p> <p>8 Q. The next stage is that you returned to the office in 9 Winslow a few days later, we're probably in about 10 mid-March 2003, to update the head of investigations on 11 progress, but you also, as you tell us, had a meeting 12 with the Commissioner, who was Mr Richard Thomas, and 13 his deputy, who you've already told us is Mr Francis 14 Aldhouse.</p> <p>15 A. Basically to update them and show them what we'd 16 recovered.</p> <p>17 Q. Did you show anybody the documentation you just 18 described?</p> <p>19 A. I'd taken -- I'd spent a few days before we went up to 20 the office looking -- giving a cursory look through the 21 documentation and I'd managed to sort of match receipts 22 from newspapers to invoices he'd sent to the people in 23 the books. So what we had was a line of a paper chain 24 from the newspaper sending the invoice out to the -- to 25 Whittamore, in return we had him -- from his papers</p> <p style="text-align: center;">Page 22</p>	<p>1 contain information as to who the blagger was in any 2 particular case?</p> <p>3 A. Yes.</p> <p>4 Q. Thank you. You demonstrated all of this to Mr Thomas 5 and Mr Aldhouse. Of course by then you hadn't conducted 6 an exhaustive analysis, this was presumably just to 7 illustrate --</p> <p>8 A. Correct.</p> <p>9 Q. -- the sort of audit trail that you could demonstrate 10 subsequently, if so required. What was the reaction, if 11 any, from Mr Aldhouse to Mr Thomas in response to these 12 revelations?</p> <p>13 A. Well, it was at the end, I basically said what we have 14 here, if we haven't got any public defence we can go for 15 everybody, from the blagger right up to the newspaper, 16 at which point there was a look of horror on 17 Mr Aldhouse's face and he said, "We can't take them on, 18 they're too big for us", and Mr Thomas just sort of 19 bemused, deep in thought, just said, "Fine, thanks very 20 much, Alex, pass my compliments on and congratulations 21 to the team for me, job well done."</p> <p>22 And that was basically it.</p> <p>23 Q. Mr Thomas, on my understanding of your evidence, he 24 didn't say anything?</p> <p>25 A. No, he just sort of -- well, as I said, just sat there.</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 He was obviously thinking, I don't know whether he was 2 thinking of something else or he was thinking of what 3 Mr Aldhouse had said, and then he just said, "Thanks 4 very much for updating us." 5 Q. Can I just understand the next stage, the stage of 6 having to sift through all this paperwork and analyse 7 it. Did you participate in that or were others under 8 you doing so? 9 A. Obviously being very early into the inquiry, I'd already 10 made an appointment to see Wilf Morgan down at the DVLA 11 with Steve Gazzard who lived in Frome at that time. 12 Having had an opportunity to glance through the papers, 13 I also noticed that there was a lot of detail about the 14 Church family, Charlotte Church's family, and I managed 15 to contact Maria Church, her mother. So I was basically 16 killing two birds with one stone by DVLA Cardiff and we 17 started off with our first victim, get a feel for it. 18 While I was down there, Roy Pollit, he offered to do 19 as much of the paperwork, photostatting that he could 20 while I was away. 21 LORD JUSTICE LEVESON: He was an investigator working for 22 you? 23 A. He was an investigator, yes. 24 When I came back, it was too far to keep going with 25 Steve from Frome so basically Roy and I teamed up on the</p> <p style="text-align: center;">Page 25</p>	<p>1 you conduct on it? 2 A. Well, once we'd photostatted everything, then we sent 3 all the documentation to a computer forensic team 4 because we wouldn't have been able to do the job unless 5 it was on disk, basically. 6 Q. You tell us this in paragraph 4.8. They conducted an 7 analysis. Their analysis was then put onto an 8 electronic document? 9 A. Yes. 10 Q. Which you made available to us, but we haven't analysed 11 it ourselves, it's far too complex and there are a large 12 number of individual journalists' names there which, 13 because of their presence, we couldn't place the 14 document in the public domain. But it's this material, 15 is this right, which covers the you say 17,000 aggregate 16 number of cases that Mr Whittamore undertook; is that 17 right? 18 A. Well, 17,000 requests to him from journalists, so yes, 19 that's what he agreed to do for the press. 20 LORD JUSTICE LEVESON: Just before you go on, Mr Owens 21 I wonder if I could ask this: you've looked at these 22 books and we, of course, haven't. You've identified 23 some of the bits of information required, names 24 associated with vehicle registration marks, telephone 25 numbers for people, people for telephone numbers.</p> <p style="text-align: center;">Page 27</p>
<p>1 whole -- that was Operation Motorman, or the staff for 2 Operation Motorman was myself and Roy Pollit. 3 MR JAY: It's clear from paragraph 4.8 that maybe two 4 activities were going on. The first activity was to 5 look at a sample of cases, you say 25 to 30 cases. 6 A. Yes. 7 Q. Which would be fully, as it were, prepped up for 8 prosecution, so you had your -- 9 A. That's what we wanted. That was our hope, yes. 10 Q. So you had your full and complete and pristine audit 11 trail there with all the relevant documents; have I 12 correctly understood? 13 A. That was our objective. You don't just get that 14 overnight. 15 Q. Of course not. 16 A. Once we knew the victim was prepared to give us 17 a complainant statement, then we'd set a pack up. 18 Q. Then more widely, you've mentioned the figure of 17,000. 19 There's a whole morass of all the material which goes 20 far beyond the sample case -- 21 A. Yes, as I said, we had 17,000 victims to choose from if 22 we wanted to. 23 Q. What if anything did you do with all the remainder of 24 the material which you weren't going to use specifically 25 for the criminal prosecution? What analysis if any did</p> <p style="text-align: center;">Page 26</p>	<p>1 A. That's correct, sir. 2 LORD JUSTICE LEVESON: Is that information which can be 3 obtained lawfully? 4 A. Car numbers, no. You can't get them. CRO records, no. 5 Not lawfully. Ex-directory -- I would have said more 6 probably no. You'd have to tell me how to get them, 7 ex-directory numbers, without them being unlawful. 8 There was area searches -- you know, Hugh Grant, find 9 out which area he's got a flat in, or specific 10 addresses, which were occupancy addresses. But amongst 11 them as well were family and friends. There's no way 12 you can get somebody's list of family and friends 13 lawfully, unless you actually know them and know what's 14 on the list. The only way you'll get them is from BT or 15 whichever phone company. 16 LORD JUSTICE LEVESON: All right. Thank you. 17 MR JAY: I'm not sure you covered mobile phone numbers. Can 18 you obtain those lawfully? 19 A. No. Well, I don't know of any register of -- no 20 directory of mobile phones, so I can't imagine, unless 21 you get it from a friend, but he must have had several 22 thousand friends. 23 Q. I understand there's a big issue in relation to 24 ex-directory telephone numbers which I'm not asked to 25 pursue with you, Mr Owens, but one of the core</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 participants is particularly concerned about that so 2 I just mention it at this stage. 3 In terms of finished product, the data set produced 4 by this independent computer forensic company, you tell 5 us that the one disk was safely locked away and another 6 disk was, as it were, your working copy? 7 A. Yes, I had a second disk made, so we always had 8 a back-up basically, and that became my working copy. 9 Q. Thank you. Can I deal now with paragraph 4.9. Within 10 a few weeks you were informed that you were not to make 11 contact with any of the newspapers identified and you 12 were not to speak to, let alone interview, any 13 journalists? 14 A. That's correct, yes. 15 Q. Who gave you that information? 16 A. Jean Lockett. She was my immediate line manager. She 17 came in one day and said basically, "You're not to go 18 near the press, you're not to make any approach to any 19 reporters or the press". At first I looked at her and 20 said, "Jean, you are joking?" and she said, "No", and 21 I could see on her face she wasn't joking, and I said, 22 "Why?" She said, "Oh, Richard's dealing with it now, 23 he's doing it through the Press Complaints Council". 24 I suppose I was out of order, I wanted to argue with 25 her, and I could see on her face it was a case of</p> <p style="text-align: center;">Page 29</p>	<p>1 with anything below that line. 2 Q. Who were the private investigators and their blaggers? 3 A. The private investigators, the little blaggers and the 4 corrupt people. 5 Q. I've mentioned Operation Glade. Operation Glade, you 6 touch on this in paragraph 4.10, Mr Owens. 7 A. Yes. 8 Q. This was focusing on misuse of the police national 9 computer and possibly the licensing agency in Swansea; 10 is that right? 11 A. No, not quite. Yes, anything -- criminal records, 12 obviously, come off the police national computer. We 13 don't have a PNC and we don't have access to inquire 14 into those. So anything to do with criminal records we 15 handed over to the police for them to investigate. 16 What we noticed is, bearing in mind we'd conducted 17 the raid in south London on 11 or 12 November, we hadn't 18 raided Whittamore until the following March, and what we 19 noticed was there were more vehicles being checked after 20 we'd neutralised the DVLA source, so obviously he's 21 gone, somebody else has stepped in. 22 We checked with DVLA and they did a very, very 23 thorough check and they said those vehicles are not 24 being checked at DVLA, so there's only one other source, 25 so we handed them over with the criminal records.</p> <p style="text-align: center;">Page 31</p>
<p>1 "Please don't shoot the messenger". 2 Q. So to be clear, because there may be some confusion 3 about this relating to other evidence I've seen, the 4 Information Commissioner's office at no stage 5 interviewed a journalist; is that right? 6 A. No. Well, not the investigation unit. I don't know -- 7 nobody from the investigation -- myself and Roy, 8 basically, from Operation Motorman, ever spoke to 9 a journalist about it. 10 Q. As part of the police investigation, in particular 11 I think Operation Glade, there is reference as to what 12 happened before the judge at Blackfriars in April 2005 13 to the police having interviewed a handful of 14 journalists. Are you aware of that? 15 A. Yes, I think I can confirm that, because obviously Glade 16 came out of Motorman. We had a very close liaison, we 17 used to keep in touch with each other, and I don't know 18 for a fact, but the last time I spoke to one of them, 19 which is a long time ago, they were talking about three 20 being interviewed under caution. 21 Q. So in terms of the continuing progress of 22 Operation Motorman, the focus was on those as it were 23 lower down the chain? 24 A. Well, yes. Basically they'd drawn a red line and with 25 the press and the reporters above that line and we dealt</p> <p style="text-align: center;">Page 30</p>	<p>1 Anything before 11 November was our area. 2 Q. You say in paragraph 4.12 there was a consultation with 3 counsel. I think we know from other documents we've 4 seen that took place in Birmingham and you attended it? 5 A. Yes, yes. 6 Q. You then prepared the documentation for what was 7 a conspiracy charge, statutory conspiracy, I believe, to 8 breach the Data Protection Act, and how many people were 9 the subject matter of that conspiracy or the 10 perpetrators of it? Was it four or five people, maybe? 11 A. On our side, yes, but obviously they were connected with 12 people on the Operation Glade side. It was like 13 a spider web. You know, everybody knew each other, but 14 some didn't do criminal -- the CRO checks, and some did. 15 Q. Certainly. We know in relation to Operation Glade that 16 there were four members of the conspiracy. In relation 17 to Operation Motorman, was it the same four? 18 A. No, only one, Whittamore. 19 Q. Whittamore was the common entity, was he? 20 A. Yes. 21 Q. The upshot was that you assembled the paperwork as you 22 would do for any criminal prosecution? 23 A. Yes. 24 Q. This one may have been on the more complex end of the 25 scale. You submitted the papers to the legal department</p> <p style="text-align: center;">Page 32</p>

<p>1 in February 2004 and as far as you were concerned, the 2 matter was going to proceed on this conspiracy charge; 3 is that right? 4 A. That was it. We were off onto other things by then. 5 Q. Paragraph 4.16 you say that in April 2005 you became 6 aware that Whittamore had appeared before Blackfriars 7 Court and been given a conditional discharge? 8 A. We only knew after that he'd appeared. Nobody told us 9 he was even coming up to court. 10 Q. Is it your understanding that this related to 11 Operation Glade rather than Operation Motorman? 12 A. At that stage we didn't know what was going on. We 13 didn't even know Whittamore was appearing in court. We 14 know there had been -- or heard there had been a bit of 15 bad blood between the Metropolitan Police and our 16 office, so I didn't know what was -- we as investigators 17 didn't have a clue what was happening. 18 Q. Right. That's fair enough, Mr Owens. There's no 19 criticism here, although we know from documents we've 20 seen, in particular from an exhibit called RJT49, that 21 what happened at Blackfriars before His Honour Judge 22 Samuels QC in April 2005 (a) related to Operation Glade 23 and not to Operation Motorman and (b) there were four 24 co-conspirators including Mr Whittamore and they each 25 received a conditional discharge. Do you follow me? Page 33</p>	<p>1 A. Yes and no. It was -- how can I put it? When -- it's 2 difficult to explain. Motorman didn't prompt it. It 3 was just another example of what followed, if that makes 4 sense. Because I had two very good investigations on 5 the go and basically they were taken off me and closed 6 down by the new head of investigations because 7 Jean Lockett had left by that time. It was like they 8 were closing every operation we had on the go down. And 9 we were basically becoming office detectives. You could 10 ring them but you couldn't go see them. I'm sure you 11 know yourself, unless you actually meet and speak to 12 a victim, you don't get the whole story. 13 So essentially, whatever decision was made after 14 Blackfriars, I had no input into it whatsoever. 15 Q. Okay, fair enough, Mr Owens. But two of your concerns 16 you express in paragraph 4.18 of your statement. You've 17 already raised the first one. You say: 18 "Allowing for the overwhelming and irrefutable 19 evidence we had gathered and made available, what 20 action, if any, did Richard Thomas ... or 21 Francis Aldhouse ... take in respect of the involvement 22 and conduct of the press and their part in this criminal 23 conspiracy." 24 A. Yes. 25 Q. It's clear that the answer to your question is that no Page 35</p>
<p>1 A. I am aware of the result eventually, but not at that 2 time. 3 Q. This did not relate to Operation Motorman, which was 4 still outstanding because it was a separate matter. Do 5 you follow that as well? 6 A. Yes, yes. You're talking about the little fish. 7 Q. Were you involved in any of the decisions which were 8 subsequently made in relation to Operation Motorman? 9 A. Such as? I'm sorry. 10 Q. There was a decision, for example, to discontinue the 11 prosecutions. 12 A. No, we were just told -- oh, discontinue the 13 prosecutions? I'd left by then. Around this time I'd 14 basically had enough. I wasn't taking any more and 15 I walked out. Went on long-term sick. There was 16 already one grievance in which wasn't being attended to, 17 more grievances went in and the first grievance was -- 18 the first, how can I say, person that contacted me from 19 ICO about the first grievance was 12 months after 20 I'd put it in, and eventually, to cut a long story 21 short, I eventually resigned, I think in September 2006, 22 and went by a tribunal hearing, employment tribunal. 23 Q. Did any of your grievances -- I don't want to go into 24 them, but did any of them relate to the conduct of 25 Operation Motorman or were they all separate from it? Page 34</p>	<p>1 action in the criminal courts was taken? 2 A. Yes. 3 Q. Whether other action was taken we'll hear about when 4 Mr Thomas gives his evidence. 5 Then your second point: 6 "Why, after agreeing a course of action, endorsed by 7 counsel, that all other persons identified as being 8 involved in unlawful activity be jointly prosecuted for 9 conspiracy, was Whittamore the only one concerned in the 10 Motorman investigation to be prosecuted and then only 11 for a simple breach of the ... act." 12 Can I just be clear about your evidence in relation 13 to that. First of all, the documents show that in 14 relation to Motorman, it wasn't just Mr Whittamore, 15 there were three other individuals who were either 16 private detectives or blaggers -- 17 A. Yes, that's -- yes they were all part of the conspiracy. 18 Q. But secondly, you're right to point out that journalists 19 were never made part of this conspiracy, do you follow 20 me, but in relation to what counsel was advising when 21 you saw him, he wasn't saying, was he, that journalists 22 were going to be part of the conspiracy? Did he not 23 make it clear that we're going to keep this to the 24 investigators and to the blaggers? 25 A. I've seen documents that I'd forgotten about, that I've Page 36</p>

<p>1 been provided with, that make it absolutely clear why no 2 journalist was prosecuted. 3 Q. You're certainly entitled to say that, but whatever the 4 reason was, the conspiracy was never expanded to include 5 the journalists, was it? 6 A. No. 7 Q. At no stage? 8 A. No. The journalists never came into the investigation. 9 Q. What the documents show, privilege has been waived for 10 it, is something I'm going to explore with Mr Thomas. 11 A. Okay. 12 Q. Thank you. Can I deal with matters following your 13 departure, which you've frankly told us about. This is 14 now paragraph 5 of your statement, Mr Owens. 15 A. After I left, yes. 16 Q. After you'd left. The first report from the 17 Information Commissioner, "What price privacy?" you 18 received a copy through the post from an anonymous 19 source; is that right? 20 A. It just arrived with a little note on it saying, "Have 21 a look at page 27, item 6.8". It would be very 22 interesting to me. 23 Q. What that says is, and I'll read it out, because you 24 know what it says but some people listening to me might 25 not, and I quote verbatim from the report: Page 37</p>	<p>1 which means we're not going to prosecute them. 2 I don't know whether that would be -- is the correct 3 word abuse of the justice system? 4 Q. It would be virtually impossible to do? 5 A. Yes, yes. 6 Q. I think you've just made a very fair point, Mr Owens, 7 but I wanted to hear you say it in your own words. 8 A. In the police force, that would never ever happen. You 9 either decide they all get investigated or -- I mean, 10 it's fine to investigate them and find those five 11 there's insufficient evidence and then throw them out, 12 but you can't just -- well, I said it, you can't do it, 13 it's impossible. 14 LORD JUSTICE LEVESON: It depends. Circumstances change 15 case, don't they, because you may very well decide 16 there's a team here that I would have to investigate. 17 That's 50 people. I don't have the manpower to do 50, 18 so we'll concentrate on the core offenders, on those at 19 the very centre. 20 A. And that's exactly what we wanted to do. Roy and I had 21 already started, shall we say, a small hit list of which 22 are the most likely journalists we would have seen. 23 LORD JUSTICE LEVESON: But what you're saying is more 24 difficult is to say, "Well, we won't go down that 25 category of people". Page 39</p>
<p>1 "This was a great disappointment to the ICO" -- the 2 "this" was the discontinuance of the criminal 3 proceedings for conspiracy -- "especially as it seemed 4 to underplay the seriousness of Section 55 offences. It 5 also meant that it was not in the public interest to 6 proceed with the ICO's own prosecutions, nor could the 7 Information Commissioner contemplate putting 8 prosecutions against the journalists or others to whom 9 confidential information had been supplied." 10 Someone had tipped you off to look at that, perhaps 11 for a reason, but what was your reaction when you saw 12 it? 13 A. It may be correct in relation to the others, you know, 14 the blaggers and the thing, but you could never go back 15 after three years and contemplate prosecuting 16 journalists. They'd never even been investigated. And 17 I -- there's enough legal people here to know if I -- 18 I kept evidence -- you can't put -- if you have 19 a conspiracy, you can't put five people on the 20 back-burner and wait and see how you got on with the 21 same five people in the front that's getting prosecuted, 22 because you got a good result, right, we'll go and 23 prosecute them as well. Well, they're all part of one 24 conspiracy. You either investigate them all, or those 25 five you have to say we're not going to investigate them Page 38</p>	<p>1 A. Yes. 2 LORD JUSTICE LEVESON: "We won't file them under too hard 3 just to get the low-lying fruit"? 4 A. Exactly right. 5 MR JAY: Thank you. You tell us in 5.2 you read about 6 Glenn Mulcaire's arrest which we know took place on 7 8 August 2006. You say you certainly never associated 8 it with Operation Motorman. Do you now associate it in 9 some way with Operation Motorman, Mr Owens? 10 A. Yes. 11 Q. And why? 12 A. Basically, at the time one of the burning questions was, 13 especially for the ex-directory mobile phone numbers, 14 what could all these journalists want it for? You're 15 talking about thousands and thousands of telephone 16 ex-directory numbers. And essentially I -- well, I can 17 say, an awful lot of the names of the victims that are 18 coming up in hacking are in Operation Motorman, 19 Steve Whittamore's books. An awful lot. And my 20 personal feeling was Steve Whittamore was gathering the 21 numbers -- he wasn't hacking, he was definitely not into 22 hacking, we found no evidence of that. But he was then 23 passing them to the papers and possibly those numbers 24 were being passed to people who hacked. I mean the 25 names of people like Milly Dowler, the numbers, Page 40</p>

<p>1 ex-directory numbers, that sort of thing, and it wasn't 2 just an occasional one. There were dozens of them, of 3 the names that have now come out in the hacking Inquiry. 4 Q. I should ask this question: did you see reference to the 5 Dowlers' ex-directory numbers in the Operation Motorman 6 material? 7 A. Yes. 8 Q. Thank you. You then a little bit later, indeed a 9 considerable time later, in August 2009 made contact 10 with Nick Davies of the Guardian? 11 A. Yes. 12 Q. Are you able to share with us what you told him in 13 general terms? 14 A. Basically, it was when he revealed -- or when the -- it 15 was right after the Gordon Taylor story broke, that 16 there were more, it wasn't just Clive Goodman and his 17 lone rogue reporter. It was then it dawned on me this 18 is what they wanted the numbers for: to hack. And at 19 the time I think Nick was -- Nick Davies was trying to 20 get some support, somebody to believe him, some sort of 21 concrete evidence to continue his campaign, and 22 I thought if he saw this, it would highlight how many 23 victims there were in Operation Motorman, and one 24 detective -- or hacker wouldn't do five or six numbers, 25 and the purpose was to give him some strength behind his</p> <p style="text-align: center;">Page 41</p>	<p>1 number, they've got the list of family and friends and 2 then they've had family and friends -- 3 LORD JUSTICE LEVESON: You have to be a bit careful about 4 that, haven't you, Mr Owens, because you're not saying 5 that for every single number they were all family and 6 friends. 7 A. Oh no. 8 LORD JUSTICE LEVESON: So unless you correlate what 9 information was going to what newspaper, it's actually 10 quite difficult to decide what that newspaper might have 11 wanted the information for? 12 A. Yes. 13 LORD JUSTICE LEVESON: Your criticism is that you weren't 14 ever allowed to look at it? 15 A. Basically -- well, we weren't allowed to ask the 16 question. We were not allowed to ask the press what did 17 you want it for? 18 MR JAY: Your point is it might not have required a huge 19 amount of delving and interrogation by you of the 20 relevant journalists to get the answers you needed to 21 these questions, some of which might have incriminated 22 the journalist, but others of which might have 23 exonerated them -- 24 A. Oh yes, I'm not saying they were all dishonestly 25 obtained -- not for a dishonest purpose, or -- you know,</p> <p style="text-align: center;">Page 43</p>
<p>1 own campaign and at the same time let the people out 2 there who'd been victims in Operation Motorman know 3 they'd been victims, because we'd only seen 60 or 70 and 4 been able to tell them. There were still 4, 5, 6,000. 5 I've obviously never counted them. So it was a twofold. 6 Q. Just to explore that a little bit with you, Mr Owens, 7 and put forward two other possible hypotheses which may 8 or may not be right. 9 First of all, in relation to all the titles who were 10 not associated with the News of the World, and of course 11 you have in mind the list of titles which were tabulated 12 in -- 13 A. Yes. 14 Q. -- the second report. They might say, "The reason why 15 we wanted these phone numbers was nothing to do with 16 hacking, but we wanted a ready means of contact details 17 for people in case we were going to write a story about 18 them and we wanted to check the accuracy of our story 19 before we published it." Would you agree that that at 20 least is a possible reason why these titles needed these 21 numbers? 22 A. No. 23 Q. Why do you think not? 24 A. There's too many. There are just too many numbers to 25 ring up. And you've got an example of they've got the</p> <p style="text-align: center;">Page 42</p>	<p>1 the gutter press, so to speak, to chase people, find out 2 where they're going to meet and that sort of thing. 3 Q. The second hypothesis I put to you is specifically in 4 relation to News International and it's this: they had 5 their own expert hacker in Mr Glenn Mulcaire, who might 6 have been the best in the business. Why did they need 7 Mr Whittamore as well? Do you follow that? 8 A. It was listening to Mr -- yesterday. 9 Q. Mr McMullan? 10 A. Mr McMullan, it was listening to him that, how can I put 11 it? It rang a bell. Because they appear to have used 12 the sames Hell's Angel, as he put it, if it is the same 13 Hell's Angel, so there was actually an indirect link 14 between Whittamore, McMullan, with this Hell's Angel, 15 and he was the man who could get the phone numbers. It 16 was only when he said it yesterday that I -- I put this 17 connection together. 18 LORD JUSTICE LEVESON: All right. 19 MR JAY: Thank you. 20 LORD JUSTICE LEVESON: The answer is, all these are things 21 that you would have looked at? 22 A. Yes, sir. I wish we could have. 23 LORD JUSTICE LEVESON: All right. 24 MR JAY: Then you refer to a Panorama programme, which 25 indeed is the same one I saw over the weekend, 5.6 of</p> <p style="text-align: center;">Page 44</p>

<p>1 your statement, and Mr David Smith.</p> <p>2 A. That's what prompted me to -- that was going over the</p> <p>3 line.</p> <p>4 Q. What did he -- well, you set out what he said which you</p> <p>5 were concerned about. He did make a statement in the</p> <p>6 programme that no journalists was ever prosecuted:</p> <p>7 "... because we didn't have the evidence that those</p> <p>8 journalists knew beyond all reasonable doubt that the</p> <p>9 information had been obtained illegally."</p> <p>10 In one sense that was entirely true, because they</p> <p>11 didn't have the evidence, and in the other sense it</p> <p>12 was -- you would use your own word in relation to it.</p> <p>13 They didn't allow you to take the reasonable steps to</p> <p>14 obtain the evidence?</p> <p>15 A. We were stopped from getting the evidence. Well,</p> <p>16 additional evidence, and I'll still contend to this day</p> <p>17 that the evidence we had was strong enough to stand on</p> <p>18 its own. In certain cases. You have 30 years of</p> <p>19 experience in the police and some considerable</p> <p>20 experience in this office, so you obviously had a good</p> <p>21 instinct for strong evidence and weak evidence.</p> <p>22 Q. You've used the term "in certain cases". Could you help</p> <p>23 us a little bit more with that? Why do you feel the</p> <p>24 evidence was --</p> <p>25 A. It's by the extent of it, the number of times they'd</p> <p style="text-align: center;">Page 45</p>	<p>1 A. Oh, yes.</p> <p>2 LORD JUSTICE LEVESON: And was provided with those figures.</p> <p>3 They're not your figures.</p> <p>4 A. Yes.</p> <p>5 LORD JUSTICE LEVESON: They were in his book before you were</p> <p>6 in touch with him.</p> <p>7 A. Yes, yes, I understand. I thought you said they were my</p> <p>8 figures.</p> <p>9 MR JAY: No, your figures I appreciate are slightly bigger</p> <p>10 figures and I'm going to come to the bigger figures, but</p> <p>11 at the moment I'm preaching this sort of as</p> <p>12 uncontroversially as I can because the purpose of the</p> <p>13 question is rather different. You have 13,343, you have</p> <p>14 1,900 they say we don't know, but we have about 6,000</p> <p>15 where they say a very strong case, I think it was, and</p> <p>16 about 5,000 probable case of breach of the Act. Are you</p> <p>17 able to assist at all about this 6,000 and 5,000 figure</p> <p>18 and whether you would agree with that sort of assessment</p> <p>19 and, if so, what are the considerations which would lead</p> <p>20 you as an experienced police officer to classify a case</p> <p>21 as a very good case or a probable case?</p> <p>22 A. On an individual basis or overall?</p> <p>23 Q. I think overall and then on an individual basis.</p> <p>24 A. Basically, obviously -- on an overall case, you'd look</p> <p>25 for how many enquiries each journalist has done and then</p> <p style="text-align: center;">Page 47</p>
<p>1 used Whittamore -- we had some journalists in there, one</p> <p>2 or two occasions they've used him. We have some who</p> <p>3 have used him 200, 300, 400 times, that are going for</p> <p>4 criminal records, ex-directories. So you'd have to look</p> <p>5 at how many entries and exactly what they were asking,</p> <p>6 and some of them were persistently obviously asking</p> <p>7 for --</p> <p>8 Q. Can I just ask you one further question about this? We</p> <p>9 see various data set out in Mr Davies' book which had</p> <p>10 been obtained pursuant to a request under the Freedom of</p> <p>11 Information --</p> <p>12 A. Oh, his book had been published before I contacted him.</p> <p>13 Q. Yes. What he said, he said, I think there were 13,343</p> <p>14 individual taskings. I know your figure is higher, I'm</p> <p>15 going to come to that. He said, I think, 1,900-odd you</p> <p>16 couldn't classify one way or the other --</p> <p>17 A. Where is this set out?</p> <p>18 Q. It's set out in Mr Davies' book.</p> <p>19 A. No, the book had already been printed and published --</p> <p>20 Q. I'm just referring to it as a convenient means of</p> <p>21 identifying the different categories of data.</p> <p>22 LORD JUSTICE LEVESON: I think you're at cross purposes.</p> <p>23 What Mr Jay is saying to you is that Mr Davies asked</p> <p>24 through the Freedom of Information Act for certain</p> <p>25 figures --</p> <p style="text-align: center;">Page 46</p>	<p>1 look at the type of enquiry they've done. Even one</p> <p>2 journalist obtaining one criminal record, that's a</p> <p>3 whole -- there's no disputing he's guilty. When I say</p> <p>4 guilty, he's committed an offence.</p> <p>5 LORD JUSTICE LEVESON: Because nobody can lawfully obtain</p> <p>6 that sort of information?</p> <p>7 A. You can lawfully obtain it, but only under certain</p> <p>8 circumstances. DVLA will release the name and address</p> <p>9 of an owner of a vehicle provided --</p> <p>10 LORD JUSTICE LEVESON: No, you were talking about criminal</p> <p>11 records there.</p> <p>12 A. Oh, sorry, criminal records, yeah. No, he can't</p> <p>13 lawfully obtain criminal records.</p> <p>14 MR JAY: And you're right, because I think I've done it</p> <p>15 myself. In relation to DVLA, if you say you've been</p> <p>16 involved in an accident and you give the registration</p> <p>17 mark to DVLA pursuant to a lawful request --</p> <p>18 A. Yes.</p> <p>19 Q. -- then they have to answer it?</p> <p>20 A. Yes, they can then release it. But if you haven't been</p> <p>21 in an accident and you say you have, you're back to</p> <p>22 breach of section 55 of the --</p> <p>23 Q. Yes.</p> <p>24 A. -- Data Protection Act.</p> <p>25 Q. This is helpful because it's enabling us to classify, do</p> <p style="text-align: center;">Page 48</p>

<p>1 you see?</p> <p>2 A. Yes.</p> <p>3 Q. Is there any further assistance you can give us on the</p> <p>4 other types of information?</p> <p>5 A. Well, ex-directory is -- there's only one way that I've</p> <p>6 ever known you can lawfully get an ex-directory number</p> <p>7 and that was taught to me by -- when I say taught, it</p> <p>8 was told to me by an old private detective and he said</p> <p>9 what he used to do, if it was an ex-directory number, he</p> <p>10 couldn't get them illegally -- well, he wouldn't get</p> <p>11 them illegally -- he'd go back years and years into the</p> <p>12 old directories.</p> <p>13 Q. Yes, I see.</p> <p>14 A. It may well be at some time it wasn't ex-directory and</p> <p>15 it was made ex-directory, but he said invariably that</p> <p>16 was the -- you know, that was very few and far between.</p> <p>17 Q. That's one of the examples, if one looks at the report,</p> <p>18 where Mr Thomas is saying it would be so expensive to do</p> <p>19 that that --</p> <p>20 A. Well, yes.</p> <p>21 Q. -- you could reasonably infer that that's not the way</p> <p>22 the information was obtained?</p> <p>23 A. Yes.</p> <p>24 Q. I think we're beginning to get the hang of this now,</p> <p>25 Mr Owens, thank you very much. But after the Panorama</p> <p style="text-align: center;">Page 49</p>	<p>1 numbers. They weren't just all connected to one person.</p> <p>2 Not like sort of 24 requests in relation to one</p> <p>3 individual. There may have been a couple of requests</p> <p>4 related to one individual, but I didn't count how many</p> <p>5 individuals, but there's got to be four or five.</p> <p>6 Q. Two questions flowing from that. The first relates to</p> <p>7 the figure of 3,757, which you give at the bottom of</p> <p>8 page 15.</p> <p>9 A. Yes.</p> <p>10 Q. I think it's fair to say, and this is certainly my</p> <p>11 understanding, that the table which we see in the second</p> <p>12 report, "What price privacy now?" it's true, if you add</p> <p>13 up all the numbers, it does add up to 3,757, does not</p> <p>14 claim to be the total of all Whittamore's taskings.</p> <p>15 They were just looking at a narrow cohort of --</p> <p>16 A. I didn't know what the criteria was for this table.</p> <p>17 Q. The second point is the issue of how you look at the</p> <p>18 number of requests. You do indeed make this clear in</p> <p>19 your statement. But the difference between, if I can</p> <p>20 put it in this way, your approach and the ICO's approach</p> <p>21 is whether certain requests should be grouped together</p> <p>22 and treated as one, which may have been the ICO's</p> <p>23 position, or whether they should each be treated</p> <p>24 individually, which from my understanding of your</p> <p>25 evidence is your position?</p> <p style="text-align: center;">Page 51</p>
<p>1 programme, you tell us at 5.8 that you decided to</p> <p>2 re-examine the evidence?</p> <p>3 A. Yes. After what Mr Smith had to say I thought let's</p> <p>4 have a look back at that.</p> <p>5 Q. You'd obtained your own personal working copy of the</p> <p>6 Operation Motorman database, is that right?]</p> <p>7 A. That's correct.</p> <p>8 Q. And you explain why in paragraph 5.9.</p> <p>9 A. Yes.</p> <p>10 Q. Can I ask you what analysis if any that you carried out,</p> <p>11 and this was an analysis you undertook, it must have</p> <p>12 started in April of this year?</p> <p>13 A. Yes. Bearing in mind I'm not an expert in drawing up</p> <p>14 tables and analysis, I did it in the simplistic way.</p> <p>15 Obviously the overall figure published in "What price</p> <p>16 privacy now?" was something like, off the top of my</p> <p>17 head, 3,500 or 3,700. In my total, there was 17,000,</p> <p>18 17,500. And then when you look at the individual papers</p> <p>19 on the league table, obviously the easiest one is to</p> <p>20 start at the bottom, the Sunday World. One reporter and</p> <p>21 one request to Whittamore.</p> <p>22 You only have to type in Sunday World and up comes</p> <p>23 the name of that reporter. And you tap in his name and</p> <p>24 I found 24 requests that that one reporter had made of</p> <p>25 Whittamore. And they were criminal records and vehicle</p> <p style="text-align: center;">Page 50</p>	<p>1 A. Yes, yes.</p> <p>2 Q. Do I have that right?</p> <p>3 A. Yes, that's correct. And mine, there are 17,500 entries</p> <p>4 in the four books.</p> <p>5 Q. But again, I think this is probably obvious by now, that</p> <p>6 what it means in quantitative terms is that the minimum</p> <p>7 number is the ICO's official 13,343 figure, but the</p> <p>8 maximum number is your approximately 17,500 figure?</p> <p>9 A. I'll accept that, yes.</p> <p>10 Q. So that's the difference between you?</p> <p>11 A. Yes.</p> <p>12 Q. And without, I'm afraid, looking individually at the</p> <p>13 data, it's not going to be possible to resolve which of</p> <p>14 you is right? Do you understand that?</p> <p>15 LORD JUSTICE LEVESON: And it probably doesn't matter,</p> <p>16 Mr Jay.</p> <p>17 MR JAY: I was about to say it doesn't matter anyway,</p> <p>18 because we have frankly a hell of a lot of requests.</p> <p>19 The difference between nearly 13,500 and 17,500 is not</p> <p>20 so big that we need lose huge sleep over it. But I see</p> <p>21 where you're coming from, Mr Owens, don't get me wrong.</p> <p>22 Then you look at a further analysis. I am asked to</p> <p>23 draw to your attention, because I know</p> <p>24 News International are concerned about it,</p> <p>25 paragraph 5.13, please. You say there that the figures</p> <p style="text-align: center;">Page 52</p>

<p>1 published for the Sunday Times show one reporter making 2 four requests when the evidence shows six reporters 3 making over 100 requests. Can I just take you through 4 the sequence of events and see how far we get with that, 5 that it is right that the original table published by 6 the ICO in December 2006 shows the Sunday Times with in 7 fact seven reporters and 52 requests, which of course 8 isn't the same as the figures you've given in your 9 witness statement, but is closer to your figures than to 10 the final figures given by the ICO's office. Do you 11 follow that? 12 A. How can I put it? This the figures I worked out from 13 the books, but I'm thinking their figures are putting -- 14 instead of individual -- if there's two entries from one 15 individual, that's one inquiry as far as they're 16 concerned. That's the way I'm -- I think it's coming 17 across. 18 Q. This was a matter which was specifically corrected, 19 though, by the ICO. If I can read out what -- this is 20 exhibit RJT29. I've seen a better document but I've 21 lost the reference. I was looking at it this morning. 22 There is a letter from Mr Thomas where he apologised to 23 the Sunday Times, I'm sure it's this letter but I've 24 seen a shorter one and a clearer one, and he accepted 25 that the correct figures for the Sunday Times, and I'm</p> <p style="text-align: center;">Page 53</p>	<p>1 Was that the letter to which you were referring? 2 MR JAY: There was a yet further one that I was looking at 3 where Mr Thomas gave a fulsome apology, but I can't find 4 it. I thought I'd noted it down. But it's certainly 5 the data as set out in that letter. 6 Yes, he does make an unqualified apology. Maybe I'm 7 thinking of the same letter all along. 8 LORD JUSTICE LEVESON: Yes. Although he does say: 9 "I do not think that it makes a material difference 10 to the overall thrust of the two reports." 11 MR JAY: The bullet points you make, Mr Owens, in 5.18, you 12 feel it a wrong decision in the first place not to 13 investigate a journalist. That decision was not based 14 on any advice by counsel or any lack of evidence. You 15 say the decision was based on considerations of fear and 16 the report was too little too late. 17 A. Yes. 18 Q. In your supplementary statement, you make it clear -- 19 this is your response to what Mr David Smith said -- 20 that you are well aware that by disclosing the 21 information you had, you would be in breach of section 22 59 of the Act? 23 A. Yes. 24 Q. And then you say: 25 "In the first instance, I tried to make contact</p> <p style="text-align: center;">Page 55</p>
<p>1 afraid you're going to have to take it from me for the 2 time being but we will produce the document, were one 3 reporter and four requests, and then the amended table 4 reflected that correction. 5 A. I've never seen an amended table. 6 Q. I'm sure you haven't, Mr Owens. The only point in me 7 putting that to you was to make the Sunday Times' 8 position absolutely clear. 9 A. As I said, I'm just going -- 10 Q. Yes. 11 The basic points you make are clearly set out in 12 paragraph 5.18, aren't they, Mr Owens? 13 LORD JUSTICE LEVESON: Yes, the letter you wanted to refer 14 to is attached to tab 34. And the observation is at 15 00487: 16 "We took issues we raised very seriously and your 17 letter prompted us to revisit the composition of the 18 table of publications. A detailed investigation has now 19 revealed that we recorded the figures to the Sunday and 20 the News of the World incorrectly. The true figures is 21 that there are only four cases at the Sunday Times, all 22 of which involve one journalist." 23 MR JAY: Yes. 24 LORD JUSTICE LEVESON: "The figures for the 25 News of the World increase."</p> <p style="text-align: center;">Page 54</p>	<p>1 again with Mr Davies." 2 But you were unable to do so. But you did -- and 3 you tried to make contact with four other people. Am 4 I to deduce that you failed to make contact with those 5 people? 6 A. I answer it in my next paragraph. 7 Q. Can we be clear -- 8 A. Oh, sorry. 9 Q. Who did you make contact with? 10 A. I made contact with one of them. I'm quite happy to 11 name them, but I think, sir, you should know the names 12 I'm going to give before -- 13 LORD JUSTICE LEVESON: I don't really think it matters. The 14 point is that in the end you decided that the public 15 interest required you to disclose what you disclosed and 16 so that's what you were going to do. 17 A. Yes. 18 LORD JUSTICE LEVESON: And the consequences will be the 19 consequences? 20 A. Correct, sir. 21 MR JAY: You feel so strongly about this that it's clear, 22 according to your conscience, I suppose, where the 23 public interest takes you? Have I -- 24 A. I have no concerns, sir. 25 Q. Just a few questions from others, if you understand.</p> <p style="text-align: center;">Page 56</p>

<p>1 There are other people in this room who want me to ask 2 questions. 3 A. Yes. 4 Q. I have asked some of the questions. This issue of 5 ex-directory phone numbers. Would you agree, at least 6 to this extent, that we're talking about ex-directory 7 phone numbers in relation to landlines? 8 A. Yes. 9 Q. And it's much -- I'm not saying it's impossible, but 10 it's much harder to hack into a landline, isn't it, 11 compared with a mobile phone? 12 A. True. Well, I've never done any hacking and I'm not 13 a telephone engineer, but let's put it this way. If 14 I want to speak to someone in confidence, I insist that 15 they ring me on a landline, if that answers your 16 question. 17 Q. I think it does. There are some questions from someone 18 else. Can I deal with it in this way, and I hope 19 fairly? Were there concerns within the office about 20 your reliability as a potential witness, that is 21 concerns which were expressed to you? 22 A. No. Never. 23 Q. You may certainly answer this question no, and if you 24 do, you're entitled to, but I'll put the question: are 25 you willing to tell the Inquiry why you took an extended</p> <p style="text-align: center;">Page 57</p>	<p>1 getting -- and the grievance was against -- one of the 2 people was Mr Aldhouse, the deputy himself. Nobody had 3 spoken to me about my grievance, not a word. But in the 4 meantime, I was suddenly getting -- you know, I couldn't 5 cough in the office without getting a disciplinary 6 notice that they've done me. 7 LORD JUSTICE LEVESON: All right. 8 A. That was within -- I'd never had a disciplinary notice 9 on me in the seven years I'd been there. After I put 10 the grievance in, I had three disciplinary notices 11 served on me within the next six weeks. So -- and 12 nobody had spoken to me about my first grievance, and 13 I went off sick basically to protect myself because 14 I knew it would just be grievance after grievance. 15 I remained off sick and I still haven't got the 16 emails, but I'm sure the solicitors have dealt with it. 17 Trying to get them -- because I wasn't giving in, 18 I wanted that grievance outed because part of it was 19 false pretences, and I stayed off sick and eventually 20 I said I'm going to put me resignation in, they said oh 21 no, no, they brought in independent -- not with 22 themselves. That first grievance was first looked at 23 one year later and my grievance of false pretences was 24 upheld. 25 LORD JUSTICE LEVESON: All right.</p> <p style="text-align: center;">Page 59</p>
<p>1 period of, I'll put it in these terms first, leave from 2 2005? 3 A. Yes. Everything. Yes, I'll quite happily tell the 4 Inquiry. Do you want me to tell the Inquiry? 5 Q. First of all, was it sick leave? 6 A. It was -- I was off sick, yes, with stress for the very 7 simple reason if I hadn't have gone off, I was getting 8 victimised and they were trying to sack me, and I'll 9 explain it in full quite happily. 10 Q. Maybe it's possible to short circuit it in these terms 11 and then we'll see whether we need to go into it. 12 A. Okay. 13 Q. Were there proceedings -- I think you've made it clear 14 that there were, but just to have it confirmed -- were 15 there proceedings before an employment tribunal in 16 relation to these matters? 17 A. There were no disciplinary proceedings -- 18 LORD JUSTICE LEVESON: No, proceedings from an employment 19 tribunal which you brought? 20 A. No. Well, I couldn't until I resigned, and with 21 grievance -- the very simple fact is I put a grievance 22 in that -- I'll tell you the details if you want, but 23 I put a grievance in for the simple fact I put a 24 grievance in, four months later nobody had spoken to me 25 about that grievance. Instead, I had now been</p> <p style="text-align: center;">Page 58</p>	<p>1 MR JAY: Did you resign claiming constructive dismissal? 2 A. Yes, yes, sorry, yes, I did. 3 Q. Were there proceedings or was your employment -- 4 A. No, it was -- 5 Q. Was there a settlement? 6 A. It was settled, yes. 7 Q. I think what might be said, so I'll make it explicit, is 8 that you have some grievance, continuing grievance 9 against the Information Commissioner's office and 10 therefore your evidence should be treated as unreliable 11 in some way. I'm inviting you to comment on that. 12 A. Absolute rubbish. 13 Q. Okay. The copy of the disk which you took, were you 14 intending to use that in any way in employment 15 proceedings if necessary? 16 A. One of the trumped-up disciplinary related to my -- how 17 shall I say? The quality of my work. 18 Q. I see. 19 A. So let's put it this way. I was going to say, well, you 20 know, look at the work alone that's in this one. 21 Because I was supposed to supervise the other 22 investigators, and to be honest, the majority apart from 23 one were all 25, 30 years served officers. They were 24 all dotted around the country. I think one of them was 25 a lack of supervision.</p> <p style="text-align: center;">Page 60</p>

<p>1 LORD JUSTICE LEVESON: All right.</p> <p>2 MR JAY: The last point is, and I think you've already</p> <p>3 confirmed this, that in your second statement you say</p> <p>4 you made telephone contact with somebody, because you</p> <p>5 identified four people you were trying to contact. Did</p> <p>6 you --</p> <p>7 A. No, I didn't make contact with any of those. Well,</p> <p>8 I made telephone contact with one, who never -- was</p> <p>9 going to come back to me, never did.</p> <p>10 Q. It was an initial contact and nothing came of it?</p> <p>11 A. It was just trying to find -- I needed some advice on</p> <p>12 which way to go, because as I said, section 59 is</p> <p>13 a criminal offence and in my 60s, after 30 years'</p> <p>14 service, I don't want a criminal offence, and in the end</p> <p>15 I said what I said to (inaudible), I said I'm going to</p> <p>16 get it out there into the public, I went to the</p> <p>17 Independent.</p> <p>18 Q. In relation to the Independent newspaper, what in</p> <p>19 a nutshell happened, if anything?</p> <p>20 A. They -- well, I said I'm -- you know, don't put me name</p> <p>21 in, but whoever reads it will know who I am. I said</p> <p>22 I don't like my name being publicised, as such, but</p> <p>23 anyone at ICO that had anything to do with the</p> <p>24 investigation should have known who I was within ten</p> <p>25 seconds. I think the Independent publishing on the</p> <p style="text-align: center;">Page 61</p>	<p>1 So that's the sort of people that the -- I know</p> <p>2 senior management's changed, but they have to go to the</p> <p>3 police to get them to do their job, the ICO job, and</p> <p>4 I don't know, perhaps they were frightened I was going</p> <p>5 to fight them off. My 4-year-old grandson can beat me</p> <p>6 in a fight now. But that is typical of ICO as it was</p> <p>7 and obviously as it still is: heads buried in the sand.</p> <p>8 Their policy was basically: if you ignore a problem long</p> <p>9 enough, it will go away. Motorman didn't go away</p> <p>10 because of the hacking and then they knew that this</p> <p>11 was -- in fact, I'd already emailed the Leveson Inquiry,</p> <p>12 said, "You've got the copy, I'll be handing over the</p> <p>13 original to make sure there's been no tampering with it</p> <p>14 when I am here today", and that's why unfortunately</p> <p>15 circumstances beyond my control prevent me from handing</p> <p>16 my original, as I had, to you.</p> <p>17 LORD JUSTICE LEVESON: All right. Thank you very much.</p> <p>18 MR JAY: Thank you.</p> <p>19 LORD JUSTICE LEVESON: We'll just have five minutes.</p> <p>20 (3.39 pm)</p> <p>21 (A short break)</p> <p>22 (3.46 pm)</p> <p>23 MR BARR: Sir, good afternoon. The last witness today is</p> <p>24 Mr Mark Lewis, who is being recalled.</p> <p>25 LORD JUSTICE LEVESON: Yes.</p> <p style="text-align: center;">Page 63</p>
<p>1 front page that an ex-inspector who was the lead</p> <p>2 investigator in Operation Motorman -- I mean, the</p> <p>3 Operation Motorman team was myself and Roy Pollit.</p> <p>4 I was the SIO, he was the investigating officer. So</p> <p>5 I think there were one or two clues put there for them.</p> <p>6 MR JAY: Thank you very much indeed, Mr Owens, for coming to</p> <p>7 give your very clear evidence.</p> <p>8 A. Can I just add something onto that?</p> <p>9 MR JAY: Yes, please.</p> <p>10 A. You're talking about the Independent. That article came</p> <p>11 out on 14 September. And I basically knew I'd be</p> <p>12 getting a knock on the door tomorrow, so put the disk on</p> <p>13 top of my computer and when they come, they can have it.</p> <p>14 Nobody came, nobody came, nobody came. And the first</p> <p>15 people that came to my house was on 18 November. That's</p> <p>16 six, eight weeks. Nobody from ICO rang me up or came</p> <p>17 and said, "Can we have the disk?"</p> <p>18 And when the knock on the door -- it was two police</p> <p>19 officers who have nothing to do with data protection,</p> <p>20 and they were very polite, very courteous, they had</p> <p>21 a search warrant and they didn't have a clue about data</p> <p>22 protection. They'd come -- as I said in the paper,</p> <p>23 they'd come on a fishing trip because ICO didn't -- the</p> <p>24 words I used to them is, "You've come to do ICO's dirty</p> <p>25 work", and they were very embarrassed.</p> <p style="text-align: center;">Page 62</p>	<p>1 MR BARR: Before I recall Mr Lewis, Mr Rhodri Davies would</p> <p>2 like to say a word about the exhibits to Mr Lewis's</p> <p>3 second statement.</p> <p>4 LORD JUSTICE LEVESON: Yes.</p> <p>5 MR DAVIES: Sir, I just wanted to deal with this because</p> <p>6 these documents come from us so I wanted to explain what</p> <p>7 they are. They are all documents which were given by us</p> <p>8 to the police. One of them, although it was given by us</p> <p>9 to the police, does not originate from us. It is</p> <p>10 a document headed "Report 3", which is I think the first</p> <p>11 document in the exhibit. That was given to us by</p> <p>12 Charlotte Harris, who is going to give evidence next</p> <p>13 week, and it was then given by us to the police.</p> <p>14 LORD JUSTICE LEVESON: Yes.</p> <p>15 MR DAVIES: We do not know its origins.</p> <p>16 LORD JUSTICE LEVESON: Oh. All right.</p> <p>17 MR DAVIES: Nor, I think, does she. It was given to her,</p> <p>18 but she doesn't know --</p> <p>19 LORD JUSTICE LEVESON: By the police?</p> <p>20 MR DAVIES: No. It was given to her by an anonymous source.</p> <p>21 LORD JUSTICE LEVESON: Oh, I see.</p> <p>22 MR DAVIES: By her to us and by us to the police but we do</p> <p>23 not know its origin.</p> <p>24 LORD JUSTICE LEVESON: How interesting. Yes?</p> <p>25 MR SHERBORNE: Does it assist if I say that the origins of</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 it are explained in Ms Harris's witness statement? 2 MR DAVIES: That's true, but what she said is it was given 3 to her by someone she doesn't name and she doesn't know 4 who prepared it. 5 LORD JUSTICE LEVESON: All right. Yes? 6 MR DAVIES: I just want to make it quite clear that although 7 it reached Mr Lewis from us, via the police, it's not 8 our document and we don't know where it comes from. 9 LORD JUSTICE LEVESON: I think that is important to make 10 clear. Thank you. 11 MR DAVIES: The other documents, I think all of them, pass 12 between News International and Farrers, and normally 13 they would be privileged. They were provided by us to 14 the police in order to enable the police to carry out 15 their investigation and with a limited waiver of 16 privilege for that purpose. They were given, it seems, 17 by the police to Mr Lewis in circumstances which are not 18 quite clear to us. 19 LORD JUSTICE LEVESON: And that's how they come to me? 20 MR DAVIES: That's how they come to you. 21 LORD JUSTICE LEVESON: But the question is -- well, I rather 22 gather, given what I've just been told, that whatever 23 privilege there may be in the document is not a point 24 you're seeking to take now? 25 MR DAVIES: Exactly. The question is are we going to</p> <p style="text-align: center;">Page 65</p>	<p>1 I'm sure you understand why. 2 A. I understand. 3 LORD JUSTICE LEVESON: Yes. 4 Questions from MR BARR 5 MR BARR: Mr Lewis you provided the Inquiry with a second 6 witness statement. Are you familiar with the contents 7 of the statement? 8 A. I am familiar with it. 9 Q. Are they true and correct to the best of your knowledge 10 and belief? 11 A. The statement is true. 12 Q. We'll take the witness statement as read and I'll ask 13 just a few questions arising from it. You tell us that 14 you attended a police station on 4 November of this year 15 and you were there shown a video which you were told was 16 taken by a private investigator, Mr Derek Webb; is that 17 right? 18 A. That's partly correct. I don't think they actually told 19 me who the person who took the video was. They just 20 showed me the video. 21 Q. Is it right that you don't know who took the video? 22 A. It's subsequently been said to be Derek Webb and I've 23 seen the documents, but at the time the police gave me 24 the documents and had already shown me the video and the 25 documents refer to the video.</p> <p style="text-align: center;">Page 67</p>
<p>1 object? The answer is, in the circumstances, the answer 2 is no. 3 LORD JUSTICE LEVESON: Because you're entitled to and then 4 I would have to rule upon it. 5 MR DAVIES: Yes. That said, I want to make it clear that 6 that applies to these documents and I'm not making any 7 general waiver for any other documents for any other 8 purposes. 9 LORD JUSTICE LEVESON: So it's an argument that may yet 10 still happen? 11 MR DAVIES: Indeed. 12 LORD JUSTICE LEVESON: Very good. 13 MR DAVIES: That is the position. 14 LORD JUSTICE LEVESON: Right, thank you. 15 MR BARR: Against that background, I recall Mr Lewis. 16 LORD JUSTICE LEVESON: Yes. I don't have the correct bundle 17 of Mr Lewis. I have Mr Lewis's bundle but I think it's 18 his original bundle. 19 MR BARR: I don't know whether my instructing solicitor has 20 a spare copy. (Handed) 21 LORD JUSTICE LEVESON: Thank you very much. Mr Lewis, 22 you've taken the oath in the Inquiry so that's perfectly 23 in order. You're still bound by it. 24 MR MARK LEWIS (recalled) (on former oath) 25 LORD JUSTICE LEVESON: I'm sorry you had to come back, but</p> <p style="text-align: center;">Page 66</p>	<p>1 Q. I see. The video, you tell us, shows footage of your 2 ex-wife and one of your daughters, who was then aged 14? 3 A. That's correct. 4 Q. Could you describe to the Inquiry your reaction when you 5 were shown that video? 6 A. That was horrific. That was truly horrific, that my 7 daughter was videoed, was followed by a detective with 8 a camera. I mean, just followed. That shouldn't happen 9 to anybody's child. I mean, obviously there's worse 10 things -- I acted for the Dowler family, so I can't 11 really compare one thing with the other, but, you know, 12 I do my job. I don't expect my children to be followed. 13 Actually, it's much wider because it was one of my 14 daughters, but all my daughters -- I have four 15 daughters -- they all said, "Does that mean someone was 16 watching our house?" And the fact is that video, until 17 it was handed to the police, was sat in the offices at 18 Wapping at News International. They had it. They ought 19 to be ashamed of themselves. It was horrific. It was 20 a horrific moment to be shown that. I didn't know what 21 I was going to see. I went to the police station 22 reasonably calm, but I didn't expect -- I didn't expect 23 to see that. They had no right to do that. 24 LORD JUSTICE LEVESON: Mr Lewis, can you tell me this. Can 25 you tell me, from what you saw or what was evident on</p> <p style="text-align: center;">Page 68</p>

<p>1 the tape, when it was taken?</p> <p>2 A. It was taken about April/May 2010, when my youngest</p> <p>3 daughter was 14.</p> <p>4 LORD JUSTICE LEVESON: All right.</p> <p>5 MR BARR: You were also shown a report which was produced by</p> <p>6 a private investigator's agency called Tectrix, weren't</p> <p>7 you?</p> <p>8 A. I was shown that.</p> <p>9 Q. And that was a report which had been commissioned by a</p> <p>10 solicitor, Mr Julian Pike of Farrer & Co, who was acting</p> <p>11 for News Group Limited?</p> <p>12 A. Correct.</p> <p>13 Q. We won't go into the contents of that report for reasons</p> <p>14 of your privacy and the privacy of other persons, but</p> <p>15 it's right, isn't it, that the purpose of the report</p> <p>16 seems to have been to investigate aspects of your</p> <p>17 private life?</p> <p>18 A. News International sought to destroy my life, and very</p> <p>19 nearly succeeded. I mean, the whole thing, when you</p> <p>20 look at these documents, is the interaction between</p> <p>21 a journalist who is doing a report for whatever reason,</p> <p>22 because the journalist -- it's another report but there</p> <p>23 was a comparison of notes between Farrer & Co, and</p> <p>24 Julian Pike of Farrer & Co was being told by Tom Crone,</p> <p>25 the in-house counsel, to compare notes.</p> <p style="text-align: center;">Page 69</p>	<p>1 by Julian Pike at Farrers and Tom Crone. They were so</p> <p>2 busy navel gazing that they hadn't realised that there</p> <p>3 were so many possible sources of this story and that the</p> <p>4 story itself was open, the court file was open for</p> <p>5 anyone to look at before it was closed. And because</p> <p>6 they were so arrogant and so stupid, they didn't bother</p> <p>7 to look at that, they just set out to ruin my life.</p> <p>8 Q. Might we look at paragraph 2, please. At the top of</p> <p>9 paragraph 2 it says:</p> <p>10 "Also on 9 July 2009, Lewis went on Newsnight and</p> <p>11 confirmed he was acting for Clifford."</p> <p>12 That's a reference to Max Clifford, isn't it?</p> <p>13 A. That's correct.</p> <p>14 Q. On 9 July 2009 were you acting for Max Clifford?</p> <p>15 A. On 9 July 2009 I was away. I wasn't on Newsnight or</p> <p>16 anything. They've got the dates wrong in this report.</p> <p>17 There is so much that is wrong with what they're doing.</p> <p>18 I was away at the time. This story had broken in the</p> <p>19 Guardian. I was notified about it by Julian Pike, who</p> <p>20 telephoned me on my mobile phone to say that the</p> <p>21 information about the Taylor settlement had got out. It</p> <p>22 was as soon as I got off the plane and turned my phone</p> <p>23 on --</p> <p>24 Q. This is the conversation you told us about last week.</p> <p>25 A. -- he told me about that. I was away. I didn't come</p> <p style="text-align: center;">Page 71</p>
<p>1 Q. We're going to come to the detail and to look at some of</p> <p>2 the documents in a moment, and perhaps if we can start</p> <p>3 that journey through your exhibits by looking at the</p> <p>4 document which following the pagination at the bottom</p> <p>5 right-hand corner -- it's been paginated more than</p> <p>6 once -- I'm looking at page 15 and it's a document which</p> <p>7 is headed "Report on Lewis and Harris investigation, May</p> <p>8 2010". Might I ask that the technician display this</p> <p>9 document on the projector, please. This document was</p> <p>10 created by Julian Pike on 5 September 2011, according to</p> <p>11 the face of the document, wasn't it?</p> <p>12 A. According to the document, yes.</p> <p>13 Q. And if we look at paragraph 1, at the top of the page,</p> <p>14 which is under the subheading "Background", it appears</p> <p>15 to set out something of the perception on the News Group</p> <p>16 News side about you, and in particular it says -- I'm</p> <p>17 looking now four lines down:</p> <p>18 "It was pretty clear to us that the source of the</p> <p>19 Guardian's information was almost certainly Mark Lewis,</p> <p>20 Taylor's lawyer, despite the strict confidential terms</p> <p>21 of the Taylor settlement agreement."</p> <p>22 Could I just ask you: did you leak any protected</p> <p>23 information to the Guardian newspaper?</p> <p>24 A. I was not the source of that story, never gave</p> <p>25 information out. It was complete arrogance and idiocy</p> <p style="text-align: center;">Page 70</p>	<p>1 back until the next day -- until the Saturday. I think</p> <p>2 that was a Thursday, 9 July. I came back -- it would</p> <p>3 have been a Thursday because the flight's only on</p> <p>4 a Monday and Thursday. I landed at the airport on</p> <p>5 Thursday. I travelled further on. On the Friday,</p> <p>6 I started to return, on the Saturday I returned to the</p> <p>7 country, so I couldn't have been on Newsnight on the</p> <p>8 9th. I think Max Clifford was on Newsnight on the 9th.</p> <p>9 Q. Perhaps I can put it this way. The suspicion appears to</p> <p>10 have been that you were asserting that you were</p> <p>11 representing Max Clifford when you weren't. Did you</p> <p>12 ever make such an assertion?</p> <p>13 A. Yes, I did, but in context I came back on the Saturday.</p> <p>14 On the Sunday, I went to see Max Clifford. I went with</p> <p>15 Charlotte Harris, who is at another law firm, JMW.</p> <p>16 I was at George Davies at that time. It was to be dealt</p> <p>17 with and Max Clifford appeared to have agreed to that as</p> <p>18 a joint instruction because we'd worked together on the</p> <p>19 previous phone hacking cases for Taylor, et cetera, and</p> <p>20 worked well as a team. And so I was being instructed on</p> <p>21 that. The whole thing then went ballistic in terms of</p> <p>22 my -- or devastating in terms of my career, that I --</p> <p>23 Q. In ways you described last week?</p> <p>24 A. This report talks about this being very good for my</p> <p>25 career, or one of the reports talks about this being</p> <p style="text-align: center;">Page 72</p>

18 (Pages 69 to 72)

<p>1 very good for my career. If my income, if I can put, 2 went down to less than 3 per cent of what it had been 3 before, if that can be described as being very good for 4 my career, then it was very good for my career, but I'd 5 rather have the other 97 per cent back.</p> <p>6 Q. That's a very clear answer. Could we have the next 7 page, page 16, on the screen, please, and the bottom 8 half of the page. I'd like to take you, please, 9 Mr Lewis to paragraph 8, and here we see something of 10 the News Group News motive. It says: 11 "On 26 March 2010, we advised Crone that News Group 12 News should look again at preventing JMW and Stripes 13 from acting. This was driven by the view that Lewis and 14 Harris were deeply untrustworthy and the potential cost 15 savings Crone had anticipated had not materialised in 16 Clifford. News Group News was advised to instruct 17 specialist counsel on whether steps could be taken to 18 prevent them from acting." 19 So it appears from this, doesn't it, that there was 20 a decided attempt to try and oust you from acting in 21 phone interception cases?</p> <p>22 A. Absolutely. It was an intentional tactic to attack me. 23 Look, I take it as a huge compliment that I had the 24 News of the World and Tom Crone and Julian Pike calling 25 me untrustworthy. I'd count my fingers if they thought</p> <p style="text-align: center;">Page 73</p>	<p>1 That was the report we touched on a little earlier. 2 Could we have the next page, please?</p> <p>3 A. Tom Crone is on record as having said he didn't 4 investigate me or authorise investigations. I think one 5 has to remember that because quite clearly black and 6 white suggests otherwise.</p> <p>7 Q. We move now to the final page of this document, which is 8 now up on the screen. We see in paragraph 10 it 9 recorded that Mr Crone instructed Farrer & Co to 10 instruct specialist counsel on professional duties and 11 obligations. In a moment I'm going to take you to the 12 note of that consultation, but sticking with this 13 document and following this summary, we see at the end 14 of the document at paragraph 13 that following the 15 consultation and some follow-up advice from Farrers, 16 that no further investigations into you and 17 Charlotte Harris were carried out by Farrers or on its 18 instructions after 18 May, looking back to paragraph 12 19 to get that date. And they assert that at no stage has 20 Farrers been involved in any investigations into 21 Mark Thomson, who the Inquiry also heard from last week. 22 Can we now turn to the consultation record to see 23 how that conclusion came about? It's at page 7 of the 24 bundle, and could we have that on the screen, please? 25 Could we start with the heading at the top, please?</p> <p style="text-align: center;">Page 75</p>
<p>1 I was trustworthy.</p> <p>2 Q. Can I just ask you about that? I'll put it to you 3 squarely. Did you do anything which might have given 4 them reason to consider you untrustworthy?</p> <p>5 A. No, not at all. It was on the contrary. What was 6 happening around that time is I'd been instructed by 7 someone to pursue a claim, and in order to attack me and 8 attack my client, I was acting for somebody called -- 9 it's on public record -- I'm acting for Nicola Phillips, 10 who was Max Clifford's assistant. They assumed, 11 wrongly, that there had been some sort of provision of 12 information, confidential information. They were too 13 stupid to realise that there had been statements in open 14 court naming Nicola Phillips that had been given to 15 Nicola Phillips by a journalist who -- and 16 Nicola Phillips had then contacted me to act. They just 17 missed the point. These were such obvious points for 18 them and they were too stupid to work it out.</p> <p>19 Q. If we can go to the next paragraph, please, Mr Lewis: 20 "On 5 May 2010 we were instructed by Crone to 21 instruct private investigators to look into ..." then 22 we've had to redact the next section "and investigations 23 firm Tectrix, which had been used on a number of 24 previous occasions by this firm, were instructed to 25 carry out electronic searches."</p> <p style="text-align: center;">Page 74</p>	<p>1 Thank you. We see that the client was News Group 2 Newspapers Limited. The date was 13 May 2010. And the 3 matters are listed on the top left. 4 We see underneath the line in bold text it says: 5 "JCP and RXC --" 6 Do you understand that to be Julian Pike and --</p> <p>7 A. If I go through these attendance notes, I'm not sure 8 that the client, although the client is shown as News 9 Group Newspapers, the last one, which is Kelly Hoppen, 10 has a different reference number, so I suspect there's 11 a second client from that. The first ones are News 12 Group Newspaper claims. I don't think the Kelly Hoppen 13 is on the same client basis.</p> <p>14 Q. Do you know who --</p> <p>15 A. RXC is Rowena Cordery. The chances are that she doesn't 16 have a middle name and that's why solicitors often use X 17 as a middle initial because I'm sometimes MXL if there 18 is another ML.</p> <p>19 MR BARR: Thank you. I see my learned friend Mr Sherborne 20 about to rise to his seat.</p> <p>21 MR SHERBORNE: I was just rising to correct something 22 Mr Lewis was saying because he wouldn't know it. 23 Kelly Hoppen had a claim but it was originally brought 24 in the Queen's Bench Division against a number of other 25 individuals. It also then included Mr Mulcaire and</p> <p style="text-align: center;">Page 76</p>

<p>1 News Group and was transferred to the Chancery Division 2 to be dealt with with the other claims, and that's why 3 it has a slightly different reference number.</p> <p>4 LORD JUSTICE LEVESON: Thank you very much. I don't 5 actually think it matters. It's obviously relating to 6 this whole investigation that's being undertaken. So 7 the names on the matter may not take us very much 8 further.</p> <p>9 So it's Mr Pike and this other lady meeting Queen's 10 Counsel at chambers to discuss the professional conduct 11 issues. Right.</p> <p>12 MR BARR: We're going to hear from Ms Harris in due course 13 so I don't need to dwell in any detail on the first 14 page. Suffice perhaps to take us to the very last 15 paragraph on the first page where we see leading 16 counsel's advice was that he said that the case against 17 Harris and Reed was "hopeless". He asked what the 18 position was with Gordon Taylor and if he could be 19 persuaded to take action against you.</p> <p>20 A. Phenomenal. Actually phenomenal that leading counsel 21 could find it on his own behalf to suggest that News 22 Group Newspapers ought to persuade one of my clients, 23 someone I had acted for, someone I'd got a lot of money 24 for, to sue me even though he hadn't threatened to sue 25 me, had no wish to sue me, as far as I know, and didn't</p> <p style="text-align: center;">Page 77</p>	<p>1 Gordon Taylor, was nothing to do with any leak or 2 anything. It was to do with he said that he had agreed 3 with me that I wouldn't act for anybody else, so that 4 I was wrong to take the instructions to act for 5 Joanne Armstrong. It had escaped him that I'd acted for 6 Joanne Armstrong before I'd acted for him. It was 7 nonsense.</p> <p>8 Likewise the advice about a waiver to Charlotte 9 Harris and Jeremy Reed. There's also been a waiver to 10 me because I'd dealt with three claims. Farrers had 11 objected and maybe Gregory Treverton-Jones QC hadn't 12 been told that in his instructions, but I'd acted for 13 two second and third claimants against News Group 14 beforehand and they'd agreed to that. They'd raised the 15 issue at that time and then waived it.</p> <p>16 This had nothing to do with professional conduct. 17 This had everything to do with trying to stop me, trying 18 to stop Jeremy Reed, trying to stop Charlotte Harris 19 from acting against them because they'd been caught for 20 doing what they'd done.</p> <p>21 Q. You made very clear that their complaint was dismissed. 22 Might I suggest though that what this paragraph seems to 23 indicate is a degree of liaison between those acting for 24 Mr Taylor and those acting for News Group News? 25 A. Oh, absolutely. There was some liaison and co-operation</p> <p style="text-align: center;">Page 79</p>
<p>1 sue me, and yet he's suggesting -- he suggests a lot of 2 things that he really ought not to have done. I'm 3 flabbergasted.</p> <p>4 Q. Can we go over the page and have on the screen page 8. 5 I'm interested in the section about a third of the way 6 down. This is in a section under the heading 7 "Background Mark Lewis/Gordon Taylor". The third 8 paragraph down says: 9 "JCP said Taylor does not want the details of his 10 claim regarding News Group to come up. Not even his 11 wife knew that he did the deal." 12 Then if I skip to the last four lines, it says: 13 "Brabners [that's Mr Taylor's solicitors] then 14 investigated the matter with a view to bringing a claim 15 against George Davies ..." 16 And they were the partnership that you were a member 17 of? 18 A. Yes. 19 Q. "... and conduct proceedings against Mark Lewis." 20 And you told us about those last week. 21 "JCP has been told previously that a complaint had 22 been formally made by Gordon Taylor against Lewis and 23 there was some complaint with the SRA." 24 A. Can I just deal with that in case I didn't make it 25 clear? The complaint that he made against me,</p> <p style="text-align: center;">Page 78</p>	<p>1 between Gordon Taylor and his solicitors and News Group. 2 It's an oddity, really, that you have a union chief 3 executive who's supposed to represent his members, seems 4 to be more concerned at protecting a newspaper that's 5 attacking his members and he basically allowed them to 6 carry on being attacked by doing what he was doing. 7 I understand he hadn't told his wife about the 8 settlement, but that's really a matter for him to deal 9 with on a domestic level, but he is a union chief 10 executive who ought to have represented his members.</p> <p>11 Q. If we turn now to page 10 following the internal 12 pagination, I want to pick up on the advice that was 13 given about a potential claim against you. Looking now 14 at the first paragraph underneath the numbered 15 paragraphs: 16 "Gregory said that we would need to develop a body 17 of evidence against him." 18 That's referring to you, isn't it? 19 "Insofar as wanting to get a court order to stop him 20 from acting, this would be virgin legal territory." 21 A. But there were two parts to that, because apart from it 22 being virgin legal territory, so there was no legal 23 authority for doing it, he had to develop a body of 24 evidence because the evidence that he had didn't support 25 the case anyway.</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 So apart from the facts being against him and apart 2 from the law being against him, it was a wonderful case. 3 For another client. 4 Q. We'll certainly come to the overall assessment in 5 a moment. Taking you to the next paragraph, four lines 6 at the bottom of that, here we go to the facts: 7 "Gregory said we would need very strong evidence 8 that Lewis simply cannot be trusted to abide by 9 confidentiality obligations. Tactically, Gregory said 10 it would be better if the running of the case were to be 11 made by Gordon Taylor rather than the Murdoch press." 12 I'm going to come in a moment over the page to the 13 assessment of where they were with the evidence, but 14 before we do that and whilst still on page 10, can we 15 pick up on the paragraph four paragraphs from the 16 bottom? It begins "JCP said that ...". 17 The last sentence perhaps puts quite graphically 18 what the key objective seems to have been. It reads: 19 "The key interest is to keep Lewis/Harris out of 20 these cases to reduce the negative publicity." 21 Is that your understanding from having read all the 22 documents of what the motive seems to have been? 23 A. Of course, I mean the previous paragraph, the final 24 sentence, appears to be to cause embarrassment and then 25 use this in other cases against NGN, and then -- that Page 81</p>	<p>1 So there we have the advice being given that it 2 might be better to try and persuade Mr Taylor to do it. 3 If we go over to page 13, at the top of that page it 4 says: 5 "JCP said he did not have instructions but he could 6 see that Gordon Taylor might think he could not be 7 bothered. If we say to him -- you are in a better 8 position to make a complaint and NGN will contribute to 9 funding your representation of this -- it might well 10 assist him. It might make Taylor more persuadable." 11 So it seems, doesn't it, that there was 12 a willingness to encourage Mr Taylor by assisting him 13 with costs? 14 A. News Group Newspapers wanted to pay for a client to sue 15 me, even though the client hadn't proposed to sue me. 16 Q. Could we now go to the letter which is at page 18 of the 17 bundle. 18 A. Can I just deal with one point out of that conference? 19 Q. Yes, please do. 20 A. Leading counsel said that I was a wide boy, that he'd 21 met me. He'd never met me. I've never spoken to him. 22 There are other Mark Lewises in the profession so it's 23 possible that one of them might be a wide boy, but I do 24 think it's out of order for him to express an opinion 25 about me without having met me or discussed it. This is Page 83</p>
<p>1 was the context of it. And then say the key interest is 2 to stop me, to stop me, to stop Charlotte Harris, to 3 keep us out of these cases, to reduce ... outrageous. 4 LORD JUSTICE LEVESON: What they're saying is that you're 5 trying to use the Guardian to cause embarrassment, isn't 6 it? 7 A. I understand that. 8 LORD JUSTICE LEVESON: That's what they're saying. So 9 they're saying they want to stop you doing it. 10 A. Well, to keep me -- stop me from acting. 11 LORD JUSTICE LEVESON: Yes, well, I understand. 12 MR BARR: If we go to page 12, and starting at the top of 13 the page, the first sentence reads: 14 "Gregory said that in respect of Lewis, his advice 15 was that he did not think there was enough evidence yet 16 to persuade the court to stop him from acting." 17 So as you said a moment ago, they had problems with 18 both the law and the facts. 19 A. Apart from that, it was a great case. 20 Q. Can we go now to the third paragraph from the bottom of 21 that page. There's a short paragraph which reads: 22 "Gregory said that with regard to the other 23 evidence, Gordon Taylor is the person with the greatest 24 right and interest to bring the case. We could try and 25 persuade him to bring a claim." Page 82</p>	<p>1 a man who's written the guide to the professional 2 conduct for my profession. It seems he hasn't read it, 3 but he really ought to know that if he's going to say 4 something, he should back it up with a fact, and really, 5 he ought to apologise to me for expressing an opinion 6 because he had no right to do that. 7 Q. I think that's a matter which is in your witness 8 statement, isn't it? 9 A. Yes. 10 Q. Looking at page 18, now, of the bundle, it's a letter 11 from 7 September 2011 from Farrers to Linklaters. The 12 part of the letter I'd like to take you to is on the 13 next page, page 19. It's paragraph 5. It says -- and 14 this is essentially a paragraph in which Farrers are 15 explaining in 2011 their take on events in 2010 which 16 we've just looked at. It says: 17 "The reason for this inquiry stemmed from the 18 suspicion that Mr Lewis and Ms Harris were exchanging 19 highly confidential information gained from acting for 20 claimants (and Mr Taylor in particular) in cases against 21 NGN in order to bring further actions against NGN by 22 other potential claimants. While in hindsight the 23 relevance of the results of such enquiries may be open 24 to challenge, we are satisfied that there were 25 legitimate concerns: apart from the issue regarding the Page 84</p>

<p>1 possible exchange of confidential information, it was 2 known that Mr Taylor was sufficiently concerned about 3 the conduct of his previous law firm and Mr Lewis that 4 he had instructed new solicitors to make a complaint to 5 the SRA."</p> <p>6 What I'd like to do is ask you for your reaction to 7 that justification.</p> <p>8 A. I think firstly that that is an ex post facto 9 justification in 2011 to explain why the rules had been 10 broken, because there was no probative value whatsoever 11 in the inquiry that was being made by them. They were 12 looking into my private life in a way that had no 13 relevance whatsoever. It's impossible to think of any 14 relevance that could be determined from one answer or 15 another to what they were looking at as to whether or 16 not there had been an exchange of information, of 17 confidential information between Charlotte Harris and 18 me. The sad thing is if they'd have bothered to look at 19 the court records and things that were said in the open 20 court, they would have realised that they were wasting 21 their money anyway, making enquiries, but they did.</p> <p>22 And when you looked earlier, when you talked about 23 two different reports, the Tectrix report commissioned 24 by Farrers and the other report instigated by 25 a journalist, you have the in-house lawyer Tom Crone</p> <p style="text-align: center;">Page 85</p>	<p>1 A. I'm tempted to say it was from the Star, but it was 2 nothing -- it really isn't from the Star so don't 3 suggest that, but it has so many factual inaccuracies -- 4 LORD JUSTICE LEVESON: Be extremely careful what you say. 5 I recognise that you have absolute privilege, but I am 6 absolutely concerned not to prejudice any potential 7 investigation --</p> <p>8 A. No, I -- sorry, sir, I wasn't suggesting that it was. 9 It was just that because there are so many factual 10 inaccuracies --</p> <p>11 LORD JUSTICE LEVESON: Well, cracking jokes is a mistake, 12 too.</p> <p>13 A. I apologise.</p> <p>14 LORD JUSTICE LEVESON: As I tried to explain to Mr McMullan 15 yesterday.</p> <p>16 MR BARR: The first point that I'd like to take you to in 17 this report is on the first page. Could we go to the 18 bottom of the page, please. There's a summary about the 19 lawyers. It says, first sentence: 20 "The phone hacking story has been propagated most 21 effectively not by the police or journalists but by 22 civil lawyers." 23 And then picking up the last three lines of that 24 same paragraph: 25 "It is the lawyers and the information they</p> <p style="text-align: center;">Page 87</p>
<p>1 knowing full well that the journalist had commissioned 2 surveillance, Farrers saying that -- Julian Pike at 3 Farrers saying that they don't need to get surveillance 4 because they've sort of already got it, and then 5 Julian Pike speaking to the journalist to compare notes 6 about this.</p> <p>7 Now, ordinarily, a good, honest, proper solicitor, 8 when told that such and such, a client -- see, one 9 has -- the journalist involved is someone who was 10 involved in the hacking of a phone of a client of mine 11 that I was acting for, Nicola Phillips. His name is on 12 various documents. When a witness was looking at the 13 lives of the lawyer acting against him, then you would 14 have thought that a firm of solicitors, not least Farrer 15 & Co, and not least a barrister, Tom Crone, would turn 16 around to the journalist and say, "No, you mustn't do 17 that, you're tampering with evidence here, you're into 18 very risky territory". Instead of doing that, they 19 joined in and wanted to compare notes between their own 20 report and what he'd obtained. Diabolical.</p> <p>21 Q. The final document that I would like to take you to, 22 Mr Lewis, is the one right at the start of the exhibit 23 at page 1. As Mr Davies rightly pointed out earlier, we 24 have to keep in mind the fact that we don't at this 25 stage know who produced this document.</p> <p style="text-align: center;">Page 86</p>	<p>1 uncovered through the civil actions they helped bring 2 which ensured phone hacking became such a damaging 3 scandal for News International."</p> <p>4 Reading on into the next paragraph: 5 "At the heart of this have been three solicitors: 6 Mark Lewis, Charlotte Harris and Mark Thomson." 7 It then goes on to name others before returning to 8 you at the end of the paragraph and reading: 9 "These are the three who have driven the process." 10 So whoever wrote this document seemed to think that 11 you were one of the three solicitors who was having 12 perhaps the most impact.</p> <p>13 A. Maybe. It may be said they thought that. I think there 14 obviously were other people who were very much involved.</p> <p>15 Q. If we go now to page 5, please -- 16 LORD JUSTICE LEVESON: Sorry.</p> <p>17 MR BARR: Top of the page, page 5, under the heading 18 "News of the World strategy", to put this in context, 19 it's right to say, isn't it, that one description of 20 this document is it's a dossier about you and 21 Charlotte Harris and Mark Thomson?</p> <p>22 A. Yes.</p> <p>23 Q. And it says under this heading, "News of the World 24 strategy": 25 "The News of the World is aware of these facts and</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

<p>1 is planning to try to put pressure back on the 2 solicitors by revealing these facts and by linking their 3 political affiliations and career benefits from the 4 cases. They plan to do this publicly and through 5 discrete lobbying." 6 A. Can I just make some points on the pages that you've 7 been through? 8 Q. Please do. 9 A. There are things that they have suggested about me that 10 are just wrong as a factual basis, so the facts that 11 they were planning to rely on, the fact that I have 12 a chip on my shoulder because I went to a secondary 13 modern; I didn't go to a secondary modern, I went to 14 a private school, which sort of ruins the story, albeit 15 it's a better story in some respects, but it's just not 16 true. And certain of the issues that they've -- that my 17 political affiliations; I've not been affiliated to any 18 political party at that time. I am a classic floating 19 voter/non-voter. I have a strong interest in politics, 20 but I don't always vote for the same party, whatever. 21 So it was almost interesting to read about me. 22 I mean, that's why -- there is a grain of truth in this 23 story that whoever's prepared this dossier has bothered 24 to do some research, because my school was a grammar 25 school before it became a fee-paying school the year</p> <p style="text-align: center;">Page 89</p>	<p>1 we'd put forward, the Dowler family did not want 2 damages, and I understand why, in respect of Milly. 3 They wanted a charitable donation in respect of Milly, 4 because it would be wrong to profit in any way, to 5 inherit money from the daughter who'd been murdered. 6 There were negotiations that took place that 7 Rupert Murdoch wanted to create a Rupert Murdoch fund 8 for children to go to private schools, and the Dowler 9 family wanted the donation from him to go to funds and 10 charities which were to do with Milly's disappearance or 11 Milly's life, so it was like the swimming pool that she 12 favoured, charities for missing people, and charities 13 for cancer research and brain tumour research because 14 her godfather had died as a young man from a brain 15 tumour. 16 The negotiations had started with an offer of 17 £1.5 million which had been no charitable donation at 18 all and just 1.5 million -- 19 LORD JUSTICE LEVESON: Is it appropriate for you to be 20 revealing this, Mr Lewis? 21 A. The whole settle -- I have a difficulty because the 22 whole settlement is -- I can see the press will say that 23 he wouldn't talk about what had happened -- 24 LORD JUSTICE LEVESON: Yes, I'm just considering about the 25 privilege you owe -- the confidentiality you owe the</p> <p style="text-align: center;">Page 91</p>
<p>1 before I went, so somebody knew that there had been 2 a change of status in my school, so someone had done 3 some research in trying to find the story, but they 4 found the wrong story. 5 Q. So would it appear that what we have is a document 6 suggesting that personal details which have been dug up 7 are to be used against you and your fellow solicitors 8 and, you would say, not only that but the details were 9 very largely wrong? 10 A. Certainly. Maybe the strategy was correct, but the 11 facts that it was based upon were just wrong. 12 Q. Can I move now to a completely separate matter, and this 13 is a matter I've been asked to raise with you by another 14 core participant. It concerns the settlement of the 15 Dowlers' case and in particular the costs involved in 16 that case. Can you recall approximately the date of the 17 settlement with News International? 18 A. I can't remember the exact date. I can tell you the 19 circumstances of the deal, because it -- one presumes 20 that this must be -- there was an article, as I alluded 21 to last time, that went on a website from Associated 22 through Daily Mail who said I was holding out for more, 23 and in fact the case had -- the Dowler case had been 24 settled much earlier than that. 25 What had happened was that the negotiations that</p> <p style="text-align: center;">Page 90</p>	<p>1 Dowlers. I'm not stopping you, I'm raising the question 2 so that you can think about it before you go on. It may 3 be, you see, that this detail is not central to what 4 I have to think about, and I'm just concerned that you 5 think about your professional obligation. That's all. 6 It's up to you. 7 A. I'd rather not discuss the negotiations, save that the 8 total sum has been put forward. There wasn't any -- you 9 know, I've been asked about the costs negotiations. 10 There wasn't a costs negotiation with the newspaper. 11 There was a global sum that was paid, et cetera, that 12 that's how -- 13 MR BARR: Mr Lewis, if there's any doubt about this, I don't 14 want you to say any more about the facts of that case. 15 I think the point to do with CFAs is to give the Inquiry 16 some indication of the sorts of sums that might be 17 involved, and I can do that by asking you quite separate 18 questions. 19 Could you give us some idea of what a partner in 20 a media law firm charges by way of hourly rate? 21 A. Well, my hourly rate is £390 an hour. However, the idea 22 that you get that on a CFA is -- you only find out what 23 you're getting at the end. 24 So if you take, for example, the NMT and Wilmshurst 25 case where I acted on a CFA, gave two years of my life</p> <p style="text-align: center;">Page 92</p>

23 (Pages 89 to 92)

<p>1 to doing that probably 70 or 80 per cent of the time, 2 I think I earned about £25,000 a year from doing that 3 case because it was more important and bigger to defend 4 a cardiologist who was being sued by a libel bully(?), 5 to act for the defendants of -- who were being sued by 6 Sheffield Wednesday over what they'd blogged on a 7 website. Again I had to stand up. 8 I mean, I can hand on heart say that one would earn 9 more money in private practice being paid privately for 10 doing work, and what one has to understand when looking 11 at CFAs is that every lawyer, not just me, you get lots 12 of people who phone up and ask for advice free of charge 13 about all sorts of pursuing cases and we can't charge 14 for them and we take on cases that we are allowed an 15 uplift on, which sort of balances out over a year to 16 compensate us. 17 It's fair to say that lawyers are better paid than 18 nurses and other people. There might be a reason that 19 we are and it might be that there's also a problem with 20 the system, but the fact is, if you talk about the 21 Dowlers, again you have Sally Dowler who came in to me 22 and at the first meeting said, "We cannot afford 23 a lawyer", and I -- I mean, I have a record of saying to 24 people, "I'll act for you anyway" because that's just 25 what I do because sometimes you have to do that, but Page 93</p>	<p>1 Sienna Miller there was an admission because of the way 2 that proceeded, and I think there might have been -- 3 Q. Could I just attempt to summarise? You can tell me if 4 I'm being fair to you here. Are you trying to say that 5 any solicitor who takes on a CFA is taking a risk with 6 costs? 7 A. There is always a risk, no matter how good the case is, 8 and you do not know how you're going to get paid or what 9 you're going to get paid until the end of the case. You 10 have to win, and even when you win you don't know what 11 hourly rate a court is going to -- if you read the 12 newspapers, the newspapers suggest that you get a CFA 13 and it's a licence to print money, but actually you only 14 get paid if you win. 15 So the newspaper could, if they so wished, either 16 not defame or throw their hand in early or choose to 17 fight, and then if they lose, oddly enough, I think the 18 Telegraph uses CFAs, but other newspapers pay lawyers to 19 fight their cases. If they didn't do that, the uplift 20 on cases would be reduced, the amount extra that you 21 charge which is awarded by a court follows the further 22 on that you go, but sometimes you could waste a lot of 23 time pursuing a case and not get paid at all. 24 Q. And a final question: are you effectively saying to us 25 that the CFA system involves a certain amount of swings Page 95</p>
<p>1 I can't -- I can't insure you if you lose the case and 2 have to pay the other side. 3 Nobody knew at the time how it was going to end up. 4 We did not know that the News of the World was going to 5 end up closing down and there would be massive 6 negotiations. For all we know, there could have been 7 a total defence of the claim, et cetera, and they could 8 have lost the claim, they could have pursued a claim and 9 News of the World could have taken an issue saying, 10 "Well, Milly Dowler does not have a claim at all because 11 she's dead and therefore has no right of privacy". It's 12 a legal argument. 13 Fortunately, thankfully, people on the other side 14 had the good grace not to run that argument. But it's 15 the sort of thing that you just don't know what's going 16 to come forward. You don't know that -- and the fact 17 that the Dowler family themselves, Bob and Sally and 18 Gemma Dowler have claims, the claim is still based on an 19 inference. You have Glenn Mulcaire making notes of 20 their numbers, et cetera, but there's no actual evidence 21 to show a real call or that something that was taken 22 from that call was used. You have to establish the 23 inferences and be able to present the case. 24 In fact there's not been a judicial decision yet on 25 any phone hacking claim to say that -- possibly Page 94</p>	<p>1 and roundabouts? 2 A. There is a certain amount of that. Every lawyer will 3 tell you they've lost cases or spent time in pursuing 4 CFA cases that got nowhere and got no payment for them, 5 including the ones that you win on and find that the 6 other side can't afford to necessarily pay you. There 7 might be a better system, but at the moment there isn't 8 any other system that applies. There's no legal aid 9 that people can use to pursue claims. 10 So what you have is effectively a CFA that balances 11 the position because whether you're defending a claim or 12 defending your right by pursuing a claim, you can afford 13 a lawyer to pursue that and actually that's likely to be 14 outlawed effectively because there's an abolition being 15 proposed of the recovery of insurance premiums. So if 16 I'd said to a client, look, if you don't -- if you want 17 to pursue this claim you can do, but your insurance 18 premium is going to be substantial, that's an insurance 19 premium that has nothing to do with lawyers, lawyers 20 don't work out what the premium is and that premium is 21 going to be in excess of the damages awarded in most 22 libel cases, most privacy cases, the people -- if you 23 saw me as a client and said you might win £25,000 or 24 £30,000 in your libel claim or your privacy claim, 25 either way, you're going to have to pay for an insurance Page 96</p>

<p>1 policy which could be £50,000, but at least you won't</p> <p>2 have to -- so you'll clear your reputation or your</p> <p>3 privacy will be protected, but by the way, you'll only</p> <p>4 lose £20,000. People wouldn't bother to do that. It's</p> <p>5 all actual access to justice. It's nothing else.</p> <p>6 LORD JUSTICE LEVESON: I think we're moving slightly away</p> <p>7 from where I am, because the one thing that I can't do</p> <p>8 is affect what is presently going through Parliament.</p> <p>9 A. Yes, sir. Simply they give me a soap box to stand on so</p> <p>10 I stood on it.</p> <p>11 LORD JUSTICE LEVESON: I didn't stop you immediately, but</p> <p>12 now I'll ask you to stand off it. Is there anything</p> <p>13 else?</p> <p>14 MR BARR: No, thank you.</p> <p>15 LORD JUSTICE LEVESON: Mr Lewis, thank you very much. And</p> <p>16 I didn't stop you.</p> <p>17 Discussion</p> <p>18 MR DAVIES: Could I just say something in the light of</p> <p>19 Mr Lewis's evidence very briefly?</p> <p>20 LORD JUSTICE LEVESON: Yes.</p> <p>21 MR DAVIES: First of all, with regard to Farrer & Co, the</p> <p>22 only report they commissioned, that by Tectrix, was</p> <p>23 a desktop exercise based on publicly available material.</p> <p>24 LORD JUSTICE LEVESON: Thank you.</p> <p>25 MR DAVIES: It did not involve any surveillance.</p> <p style="text-align: center;">Page 97</p>	<p>1 MR JAY: Yes.</p> <p>2 LORD JUSTICE LEVESON: Yes, all right.</p> <p>3 MR JAY: Mr Staines has replied -- whether it's an amicable</p> <p>4 reply, I don't know yet -- to our section 21 notice. At</p> <p>5 the moment I think his summonsed to appear before you</p> <p>6 tomorrow afternoon. He wishes to make submissions about</p> <p>7 the restriction order you've made, but I think he's also</p> <p>8 seeking funding from the Inquiry in order to do that, if</p> <p>9 I've correctly understood him. I can imagine what your</p> <p>10 response might be to that suggestion.</p> <p>11 LORD JUSTICE LEVESON: Let's take this in turn.</p> <p>12 Mr Staines -- do we have his response?</p> <p>13 MR JAY: It's been skim-read by me, but not properly</p> <p>14 ingested yet.</p> <p>15 LORD JUSTICE LEVESON: As regards arguing about the</p> <p>16 restriction notice, I'd need to know whether somebody --</p> <p>17 I think probably a member of the public may be able to</p> <p>18 argue about it on Scott v Scott grounds.</p> <p>19 MR JAY: Yes.</p> <p>20 LORD JUSTICE LEVESON: Because there's a rather interesting</p> <p>21 decision in the Court of Appeal in a case called GIO,</p> <p>22 which does allow members of the public to object to</p> <p>23 things that are documents put before the court but then</p> <p>24 not seen by the public, but I'm not sure that he would</p> <p>25 fall within the criteria of those who could be funded to</p> <p style="text-align: center;">Page 99</p>
<p>1 Secondly, the physical and video surveillance which</p> <p>2 Mr Lewis has referred to was commissioned by the</p> <p>3 News of the World, and News International apologises to</p> <p>4 Mr Lewis and his family for that.</p> <p>5 He raises in his statement a point which didn't come</p> <p>6 out in his oral evidence, a question as to whether or</p> <p>7 not his phone had been hacked. We are not aware of any</p> <p>8 evidence that Mr Lewis's phone has been hacked.</p> <p>9 Apart from that, Mr Lewis's statement and indeed his</p> <p>10 oral evidence, I think it's fair to say, contains</p> <p>11 a number of expressions of opinion and comment and we</p> <p>12 don't accept those.</p> <p>13 LORD JUSTICE LEVESON: No, I understand that, but ...</p> <p>14 MR DAVIES: Yes.</p> <p>15 LORD JUSTICE LEVESON: I didn't feel it appropriate to stop</p> <p>16 them.</p> <p>17 MR DAVIES: No, no, not at all.</p> <p>18 LORD JUSTICE LEVESON: No, I understand. Thank you very</p> <p>19 much indeed. Thank you, Mr Luce.</p> <p>20 What are we doing now, Mr Jay?</p> <p>21 MR JAY: Sir, it looks like a three-day week.</p> <p>22 LORD JUSTICE LEVESON: Actually, Mr Caplan will be delighted</p> <p>23 about that because he was complaining that last week and</p> <p>24 this week made eight days, whereas it's actually only</p> <p>25 going to make seven.</p> <p style="text-align: center;">Page 98</p>	<p>1 argue that.</p> <p>2 MR JAY: I'm almost certain, sir, that he wouldn't qualify.</p> <p>3 I don't think it's right that I summarise what he's</p> <p>4 saying in his section 21 statement.</p> <p>5 LORD JUSTICE LEVESON: All right, but the answer is that</p> <p>6 we're not going to get that done for tomorrow?</p> <p>7 MR JAY: No.</p> <p>8 LORD JUSTICE LEVESON: So I will discharge the requirement</p> <p>9 that he attend to give evidence tomorrow and I will ask</p> <p>10 that he make such application as he wishes to make,</p> <p>11 although in the meantime consideration can be given to</p> <p>12 whether, A, it is lawful or, B, it is appropriate that</p> <p>13 he receive public funding to support that application.</p> <p>14 MR JAY: Yes.</p> <p>15 LORD JUSTICE LEVESON: Is that sufficient for the present</p> <p>16 purposes?</p> <p>17 MR JAY: It is.</p> <p>18 LORD JUSTICE LEVESON: Thank you. Is there anything else?</p> <p>19 MR JAY: Sir, the agenda for next week, or the timetable for</p> <p>20 next week. On Monday the witnesses will be Mr Francis</p> <p>21 Aldhouse, Charlotte Harris, Peter Burden. Their</p> <p>22 statements have been enable available to the core</p> <p>23 participants, as indeed have Tuesday's witnesses, who</p> <p>24 are Stephen Nott, Chris Atkins and David Leigh.</p> <p>25 Wednesday the 7th we are taking off.</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 LORD JUSTICE LEVESON: Yes. 2 MR JAY: On Thursday there is an academics day. We'll be 3 calling up to seven academics to assist the Inquiry. 4 LORD JUSTICE LEVESON: That will be quite hard work. 5 MR JAY: How many we call, I think, is being put under or 6 given active consideration. 7 LORD JUSTICE LEVESON: I have no problem about them being -- 8 I think the phrase in Australia is "hot-tubbed". It is. 9 Don't laugh. In other words, that some of them can -- 10 they don't all need to be individual, they can be 11 together. 12 MR JAY: We were thinking along those lines. Exactly how 13 this is going to be orchestrated is still being 14 considered, but that seems the most appropriate way, 15 some sort of interactive academics day. 16 LORD JUSTICE LEVESON: Correct. 17 MR JAY: On Friday it's going to be less interactive, 18 because we're going to call Mr Thomas. 19 LORD JUSTICE LEVESON: So we're doing four days next week, 20 so Mr Caplan gets his way, seven days but seven days 21 week by week. So any set of weeks, one only has seven 22 days. 23 MR JAY: Yes. 24 LORD JUSTICE LEVESON: I don't promise to keep that. It's 25 seven days per fortnight at the moment, but I'm not</p> <p style="text-align: center;">Page 101</p>	<p style="text-align: center;">I N D E X</p> <p>1 2 3 4 Discussion re procedure1 5 MR ALASTAIR CAMPBELL (affirmed)5 6 Questions from MR JAY5 7 Discussion re timetable115 8 Discussion re procedure118 9 MR ALEXANDER OWENS (sworn)128 10 Questions from MR JAY128 11 MR MARK LEWIS (recalled) (on former184 12 oath) 13 Questions from MR BARR184 14 Discussion214 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 103</p>
<p>1 bound by that. 2 MR JAY: Indeed, the week commencing 12 December is going to 3 be a four-day week. 4 LORD JUSTICE LEVESON: Oh, all right. So I shouldn't have 5 made the crack. 6 MR JAY: Only because the following week, that commencing 7 19 December, obviously the last week before Christmas, 8 is perforce a three-day week. 12 December is largely 9 a News International week, if I can so describe it. 10 LORD JUSTICE LEVESON: All right. Thank you very much. Has 11 everybody got that? Thank you very much. 12 (4.47 pm) 13 (The hearing adjourned until 10 o'clock 14 on Monday, 5 December 2011) 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 102</p>	

A	75:15 77:16 79:8 80:12 82:14 83:1 93:12 advised 73:11,16 advising 36:20 aegis 19:22 affect 97:8 affiliated 89:17 affiliations 89:3 89:17 affirmed 103:4 afford 93:22 96:6,12 afraid 52:12 54:1 afternoon 1:4 2:7 63:23 99:6 aged 68:2 agency 14:11,18 31:9 69:6 agenda 100:19 aggregate 27:15 ago 30:19 82:17 agree 42:19 47:18 57:5 agreed 14:24 27:19 72:17 79:2,14 agreeing 36:6 agreement 70:21 aid 96:8 airport 72:4 ALASTAIR 103:4 albeit 89:14 Aldhouse 13:19 22:14 24:5,11 25:3 35:21 59:2 100:21 Aldhouse's 24:17 Alex 24:20 Alexander 11:5 11:7,14 103:8 allegation 5:19 6:19 7:2 allegations 2:3 2:11,17 5:10 alleged 4:9 allow 45:13 99:22 allowed 43:14,15 43:16 80:5 93:14 Allowing 35:18 alluded 90:20 amended 54:3,5 amicable 99:3 amount 22:1 43:19 95:20,25 96:2 amounts 22:6 ample 8:7 amplify 14:15 analyse 25:6 analysed 27:10 analysis 24:6	26:25 27:7,7 50:10,11,14 52:22 Angel 44:12,13 44:14 anonymous 37:18 64:20 answer 4:11,19 6:3,7,10,11 35:25 44:20 48:19 56:6 57:23 66:1,1 73:6 85:14 100:5 answers 43:20 57:15 anticipated 73:15 anybody 1:8 22:17 79:3 anybody's 68:9 anyway 52:17 80:25 85:21 93:24 apart 60:22 80:21 81:1,1 82:19 84:25 98:9 apologise 84:5 87:13 apologised 53:22 apologises 98:3 apology 9:8 55:3 55:6 Appeal 99:21 appear 44:11 90:5 99:5 appeared 33:6,8 72:17 appearing 33:13 appears 70:14 72:9 73:19 81:24 application 100:10,13 applies 66:6 96:8 appointment 25:10 appreciate 9:13 10:23 47:9 approach 29:18 51:20,20 appropriate 5:18 6:19 8:9,21,21 8:23 91:19 98:15 100:12 101:14 approximately 52:8 90:16 April 30:12 33:5 33:22 50:12 April/May 69:2 area 14:20 15:8 18:13 20:4 28:8,9 32:1 argue 10:10 29:24 99:18	100:1 arguing 99:15 argument 8:5 66:9 94:12,14 arising 67:13 Armstrong 79:5 79:6 arrest 40:6 arrived 37:20 arrogance 70:25 arrogant 71:6 article 1:18,25 2:21 4:25 5:9 6:8 62:10 90:20 ascertained 19:8 ashamed 68:19 asked 1:17 4:1 16:3,10 19:12 28:24 46:23 52:22 57:4 77:17 90:13 92:9 asking 1:9 6:3 7:16 18:1 46:5 46:6 92:17 aspects 69:16 assembled 32:21 assert 75:19 asserting 72:10 assertion 72:12 assessment 47:18 81:4,13 assist 7:9,10 8:3 14:25 47:17 64:25 83:10 101:3 assistance 49:3 assistant 74:10 assisting 83:12 associate 40:8 associated 2:3,12 3:18 4:21 8:6 9:16,19,22 27:24 40:7 42:10 90:21 assumed 74:10 Atkins 100:24 attached 54:14 attack 9:15 73:22 74:7,8 attacked 80:6 attacking 80:5 attempt 73:20 95:3 attend 100:9 attendance 76:7 attended 32:4 34:16 67:14 attention 52:23 audit 24:9 26:10 August 40:7 41:9 Australia 101:8 authorise 75:4 authority 80:23 available 8:8 27:10 35:19	97:23 100:22 awarded 95:21 96:21 aware 30:14 33:6 34:1 55:20 88:25 98:7 awful 16:1 21:12 40:17,19 A4 21:7	B	b 33:23 100:12 back 9:24 17:10 17:11 19:14 23:13,21 25:24 38:14 48:21 49:11 50:4 61:9 66:25 72:1,2,13 73:5 75:18 84:4 89:1 background 66:15 70:14 78:7 back-burner 38:20 back-up 29:8 bad 33:15 balances 93:15 96:10 ballistic 72:21 BARR 63:23 64:1 66:15,19 67:4,5 69:5 76:19 77:12 82:12 87:16 88:17 92:13 97:14 103:12 barrister 86:15 based 8:23 12:9 13:13 14:18 55:13,15 90:11 94:18 97:23 basic 54:11 basically 12:13 12:15 13:6 16:9 20:2,19 21:22 22:15 24:13,22 25:15 25:25 27:5 29:8,17 30:8 30:24 34:14 35:5,9 40:12 41:14 43:15 47:24 59:13 62:11 63:8 80:5 basis 3:17 11:16 17:15 47:22,23 76:13 89:10 bearing 31:16 50:13 beat 63:5 becoming 35:9 beginning 49:24 begins 81:16	behalf 77:21 belief 67:10 believe 32:7 41:20 believed 9:1,3 believes 8:9 bell 44:11 bemused 24:19 Bench 76:24 beneath 23:24 benefits 89:3 best 44:6 67:9 better 8:2 53:20 81:10 83:2,7 89:15 93:17 96:7 beyond 8:12 10:22 26:20 45:8 63:15 big 24:18 28:23 52:20 bigger 47:9,10 93:3 birds 25:16 Birmingham 32:4 bit 33:14 41:8 42:6 43:3 45:23 bits 27:23 bizarre 4:6 black 75:5 Blackfriars 30:12 33:6,21 35:14 blagger 24:1,15 blaggers 23:7,23 31:2,3 36:16 36:24 38:14 blogged 93:6 blood 33:15 blue 21:9 Bob 94:17 body 80:16,23 bold 76:4 book 46:9,12,18 46:19 47:5 books 22:23 23:3 27:22 40:19 52:4 53:13 bother 71:6 97:4 bothered 83:7 85:18 89:23 bottom 50:20 51:7 70:4 73:7 81:6,16 82:20 87:18 bound 66:23 102:1 box 20:9 97:9 boy 83:20,23 Brabners 78:13 brain 91:13,14 Branch 18:25 breach 20:5 32:8 36:11 47:16 48:22 55:21	break 63:21 briefly 15:17 17:16 97:19 bring 82:24,25 84:21 88:1 bringing 78:14 broad 2:16 broke 41:15 broken 71:18 85:10 brought 58:19 59:21 76:23 BT 28:14 bullet 55:11 bully 93:4 bundle 17:4 66:16,17,18 75:24 83:17 84:10 bundles 15:23 Burden 100:21 buried 9:9 63:7 burning 40:12 business 16:24 19:8 44:6 busy 71:2	C	cadets 12:14 call 17:25 23:6 94:21,22 101:5 101:18 called 7:14,22,23 8:2 9:20 12:23 33:20 69:6 74:8 99:21 calling 7:6 12:22 73:24 101:3 calm 68:22 camera 68:8 campaign 41:21 42:1 CAMPBELL 103:4 cancer 91:13 Caplan 1:13,16 1:21 2:6,11,16 2:25 3:7,10,17 3:22 4:20 5:21 6:21,24 9:5 10:11 98:22 101:20 Caplan's 9:9 car 15:24 19:4 21:17 28:4 Cardiff 25:16 cardiologist 93:4 career 12:11 72:22,25 73:1 73:4,4 89:3 careful 6:3 43:3 carried 50:10 75:17 carries 10:22 carry 11:1 65:14 74:25 80:6
----------	--	--	--	--	----------	---	---	---	----------	--

case 14:25 24:2 26:20 29:25 39:15 42:17 47:15,16,20,21 47:21,24 77:16 78:24 80:25 81:2,10 82:19 82:24 90:15,16 90:23,23 92:14 92:25 93:3 94:1,23 95:7,9 95:23 99:21	91:17 charities 91:10 91:12,12 Charlotte 25:14 64:12 72:15 75:17 79:8,18 82:2 85:17 88:6,21 100:21 chase 44:1 check 16:11 21:17 23:12 31:23 42:18 checked 3:3 16:18 17:6 31:19,22,24 checks 20:14,15 20:15 32:14 chief 80:2,9 child 68:9 children 68:12 91:8 chip 89:12 choose 26:21 95:16 Chris 100:24 Christmas 102:7 Church 25:14,15 Church's 25:14 circuit 58:10 circumstances 7:18 13:24 39:14 48:8 63:15 65:17 66:1 90:19 circumstantial 6:15 civil 87:22 88:1 claim 51:14 74:7 76:23 78:10,14 80:13 82:25 94:7,8,10,18 94:25 96:11,12 96:17,24,24 claimants 79:13 84:20,22 claiming 60:1 claims 76:12 77:2 79:10 94:18 96:9 classic 89:18 classify 46:16 47:20 48:25 clear 5:4,18 8:22 8:25 10:5 20:23 26:3 30:2 35:25 36:12,23 37:1 51:18 54:8 55:18 56:7,21 58:13 62:7 65:6,10,18 66:5 70:18 73:6 78:25 79:21 97:2 clearer 53:24 clearly 9:2 18:24 54:11 75:5	client 74:8 76:1,8 76:8,11,13 81:3 83:14,15 86:8,10 96:16 96:23 clients 1:17 2:22 6:18 77:22 Clifford 71:11 71:12,14 72:8 72:11,14,17 73:16 Clifford's 74:10 Clive 41:16 close 30:16 closed 35:5 71:5 closer 53:9 closing 35:8 94:5 clue 33:17 62:21 clues 62:5 cohort 51:15 colours 21:9 column 22:1 come 4:2,5 6:21 9:2,24 14:25 31:12 41:3 46:15 47:10 61:9 62:13,22 62:23,24 64:6 65:19,20 66:25 70:1 71:25 78:10 81:4,12 94:16 98:5 comes 50:22 65:8 comfort 8:13 comfortable 11:10 coming 8:17 11:15 13:6 33:9 40:18 52:21 53:16 62:6 commas 7:8 commencing 102:2,6 comment 7:19 60:11 98:11 comments 7:25 commissioned 69:9 85:23 86:1 97:22 98:2 commissioner 13:21,22 22:12 37:17 38:7 Commissioner's 12:9 30:4 60:9 committed 48:4 common 16:11 16:12 32:19 companies 17:8 company 28:15 29:4 comparatively 15:17 compare 68:11 69:25 86:5,19 compared 57:11	comparison 69:23 compensate 93:16 competition 14:13 complain 2:1 complainant 26:17 complaining 98:23 complains 5:9 complaint 78:21 78:23,25 79:21 83:8 85:4 Complaints 29:23 complete 26:10 70:25 completely 90:12 complex 27:11 32:24 compliment 73:23 compliments 24:20 composition 54:17 computer 14:10 27:3 29:4 31:9 31:12 62:13 concentrate 39:18 concern 1:8 3:24 8:18,24 concerned 8:10 29:1 33:1 36:9 45:5 52:24 53:16 80:4 85:2 87:6 92:4 concerning 1:18 2:22 3:11 concerns 19:1 35:15 56:24 57:19,21 84:25 90:14 conclusion 75:23 concrete 41:21 conditional 33:7 33:25 conduct 27:1 34:24 35:22 77:10 78:19 79:16 84:2 85:3 conducted 16:13 24:5 27:6 31:16 conducting 14:4 conference 83:18 confidence 57:14 confidential 38:9 70:20 74:12 84:19 85:1,17 confidentiality 81:9 91:25 confirm 30:15	confirmed 19:5 58:14 61:3 71:11 confusion 30:2 congratulations 24:20 connected 32:11 51:1 connection 44:17 conscience 56:22 conscious 10:24 consequences 56:18,19 consider 1:17,21 10:14 74:4 considerable 41:9 45:19 consideration 100:11 101:6 considerations 47:19 55:15 considered 101:14 considering 91:24 consisted 13:9 conspiracy 32:7 32:7,9,16 33:2 35:23 36:9,17 36:19,22 37:4 38:3,19,24 constable 12:14 constructive 60:1 consult 9:23 consultation 32:2 75:12,15 75:22 contact 25:15 29:11 41:9 42:16 55:25 56:3,4,9,10 61:4,5,7,8,10 contacted 14:3 34:18 46:12 74:16 contain 11:11 24:1 contained 21:10 contains 98:10 contemplate 38:7,15 contend 45:16 contents 67:6 69:13 context 1:25 2:1 3:7 5:16 8:1 72:13 82:1 88:18 continue 41:21 continuing 30:21 60:8 contract 13:2 contrary 74:5 contribute 83:8 control 63:15 convenient 46:20	conversation 2:19 3:2 8:20 9:4 71:24 conversion 20:19 conversions 20:17 copy 7:13,17 29:6,8 37:18 50:5 60:13 63:12 66:20 Cordery 76:15 core 28:25 39:18 90:14 100:22 corner 70:5 Cornwall 14:4 14:22 15:5 correct 11:23,24 12:6 13:12,23 14:6,7,20 15:10 16:25 19:10 24:8 28:1 29:14 38:13 39:2 50:7 52:3 53:25 56:20 66:16 67:9,18 68:3 69:12 71:13 76:21 90:10 101:16 corrected 53:18 correction 54:4 correctly 26:12 99:9 correlate 43:8 corresponded 16:16 corrupt 16:21 17:12 23:7 31:4 cost 73:14 costs 83:13 90:15 92:9,10 95:6 cough 59:5 Council 29:23 counsel 32:3 36:7,20 55:14 69:25 73:17 75:10 77:10,20 83:20 counsel's 77:16 count 51:4 73:25 counted 42:5 country 60:24 72:7 couple 15:23 51:3 course 3:3 10:6 10:14 13:14,21 15:19 20:14 23:3,12 24:5 26:15 27:22 36:6 42:10 53:7 77:12 81:23 court 7:18 33:7,9 33:13 71:4 74:14 80:19	82:16 85:19,20 95:11,21 99:21 99:23 courteous 62:20 courtesy 20:3 courts 36:1 cover 15:3 covered 28:17 covers 27:15 covertly 2:19 co-conspirators 33:24 co-operate 20:23 co-operation 79:25 crack 102:5 cracking 87:11 create 91:7 created 70:10 criminal 20:14 26:25 31:11,14 31:25 32:14,22 35:22 36:1 38:2 46:4 48:2 48:10,12,13 50:25 61:13,14 criminality 7:3 criteria 51:16 99:25 critical 16:22 criticism 3:23 33:19 43:13 CRO 20:14 28:4 32:14 Crone 69:24 71:1 73:11,15 73:24 74:20 75:3,9 85:25 86:15 cross 46:22 culture 9:10 cursory 22:20 customers 17:13 cut 34:20	
							D
							D 103:1 Daily 1:18 4:24 6:7 7:13 90:22 damages 91:2 96:21 damaging 88:2 data 12:23 13:4 14:18 16:20,23 17:6 19:24 29:3 32:8 46:9 46:21 48:24 52:13 55:5 62:19,21 database 8:4 50:6 date 75:19 76:2 90:16,18 dated 12:4 dates 16:16,17 71:16 daughter 68:7

69:3 91:5 daughters 68:2 68:14,14,15 David 45:1 55:19 100:24 Davies 41:10,19 46:9,18,23 56:1 64:1,5,15 64:17,20,22 65:2,6,11,20 65:25 66:5,11 66:13 72:16 78:15 86:23 97:18,21,25 98:14,17 dawned 41:17 day 1:6 2:5,9,14 29:17 45:16 72:1 101:2,15 days 22:9,19 98:24 101:19 101:20,20,22 101:25 dead 94:11 deal 1:14 8:8 10:20 12:3 29:9 37:12 57:18 64:5 78:11,24 80:8 83:18 90:19 dealing 7:18,20 7:20 29:22 dealt 9:19 10:12 10:13 30:25 59:16 72:16 77:2 79:10 debate 8:19 10:7 deceased 17:17 18:6,10,11 December 1:5 13:9 53:6 102:2,7,8,14 decide 8:20 39:9 39:15 43:10 decided 5:5 50:1 56:14 73:20 decision 34:10 35:13 55:12,13 55:15 94:24 99:21 decisions 34:7 deduce 56:4 deep 9:9 24:19 deeply 73:14 defamation 7:20 defame 95:16 defence 24:14 94:7 defend 93:3 defendants 93:5 defending 96:11 96:12 definitely 40:21 degree 79:23 deliberately 5:19 delighted 98:22 delving 43:19	demonstrate 24:9 demonstrated 24:4 denominator 16:11,12 deny 3:17 21:2 department 9:23 22:13 32:25 departments 12:16 departure 37:13 depending 21:25 depends 39:14 deputy 13:21 22:13 59:2 Derek 67:16,22 describe 68:4 102:9 described 20:8 22:1,18 72:23 73:3 description 20:11 88:19 desk 15:23 18:6 desktop 97:23 despite 70:20 destroy 69:18 detail 25:13 70:1 77:13 92:3 detailed 54:18 details 16:2 17:14 19:6 42:16 58:22 78:9 90:6,8 detective 12:20 14:11,17 19:8 41:24 49:8 68:7 detectives 35:9 36:16 determined 85:14 devastating 72:22 develop 80:16,23 Devon 14:3,22 15:5 Diabolical 86:20 diary 18:6,8,14 18:24 dictionary 9:21 died 17:20 91:14 difference 51:19 52:10,19 55:9 different 21:9 46:21 47:13 76:10 77:3 85:23 difficult 35:2 39:24 43:10 difficulty 91:21 direct 13:19 directly 16:20 directories 49:12 directory 28:20 dirty 62:24	disagree 5:15 disagreed 6:18 disappearance 91:10 disappointment 38:1 discharge 33:7 33:25 100:8 disciplinary 58:17 59:5,8 59:10 60:16 disclose 56:15 disclosed 56:15 disclosing 55:20 discontinuance 38:2 discontinue 34:10,12 discrete 89:5 discuss 77:10 92:7 discussed 83:25 discussion 1:12 3:20 97:17 103:3,6,7,13 dishonest 5:19 43:25 dishonestly 43:24 disk 27:5 29:5,6 29:7 60:13 62:12,17 dismissal 60:1 dismissed 79:21 display 70:8 disputing 48:3 distinction 9:16 distinctive 21:8 Division 76:24 77:1 document 22:5 23:19 27:8,14 53:20 54:2 64:10,11 65:8 65:23 70:4,6,9 70:9,11,12 75:7,13,14 86:21,25 88:10 88:20 90:5 documentation 20:8 22:3,17 22:21 23:11 27:3 32:6 documents 15:19 15:22,23 16:2 16:5,16 17:11 26:11 32:3 33:19 36:13,25 37:9 64:6,7 65:11 66:6,7 67:23,24,25 69:20 70:2 81:22 86:12 99:23 doing 5:4 8:10 14:9 25:8 29:23 69:21	71:17 79:20 80:6,6,23 82:9 86:18 93:1,2 93:10 98:20 101:19 domain 4:10 27:14 domestic 80:9 donation 91:3,9 91:17 door 62:12,18 dossier 88:20 89:23 dotted 60:24 doubt 9:18 45:8 92:13 Dowler 40:25 68:10 90:23 91:1,8 93:21 94:10,17,18 Dowlers 41:5 90:15 92:1 93:21 dozens 41:2 draw 6:12,15 52:23 drawing 50:13 drawn 30:24 drew 2:21 driven 5:10 73:13 88:9 dropped 4:14 due 10:6,14 77:12 dug 90:6 duties 75:10 DVLA 16:6,8,13 16:15,17,21 17:1,13,19 18:1 25:10,16 31:20,22,24 48:8,15,17 dwelt 77:13	emailed 63:11 emails 59:16 embarrassed 62:25 embarrassment 81:24 82:5 emphasise 9:17 employee 16:13 16:15 employment 34:22 58:15,18 60:3,14 enable 65:14 100:22 enabling 48:25 encourage 83:12 endorsed 36:6 engineer 57:13 enquiries 16:7 47:25 84:23 85:21 enquiry 21:25 48:1 ensured 88:2 ensuring 7:22 enter 20:5 entirely 45:10 entitled 37:3 57:24 66:3 entity 12:23 32:19 entries 21:11 23:15 46:5 52:3 53:14 entry 21:11 22:5 22:6 escaped 79:5 especially 38:3 40:13 essence 14:8 essentially 17:12 35:13 40:16 84:14 establish 94:22 et 4:7 72:19 92:11 94:7,20 ethics 9:11 event 6:12 events 12:4 15:4 53:4 84:15 eventually 13:3 18:16 23:10 34:1,20,21 59:19 everybody 24:15 32:13 102:11 evidence 2:2,14 2:18 3:4,14,18 3:21 5:22,24 6:5,6,7,14,15 7:6,7,14,24 8:2 8:17 9:17,20 10:5 11:2 12:2 15:4 23:21 24:23 30:3 35:19 36:4,12 38:18 39:11	40:22 41:21 45:7,11,14,15 45:16,17,21,21 45:24 50:2 51:25 53:2 55:14 60:10 62:7 64:12 80:17,24,24 81:7,13 82:15 82:23 86:17 94:20 97:19 98:6,8,10 100:9 evident 68:25 ex 85:8 exact 14:20 15:11 90:18 exactly 16:16,23 18:25 39:20 40:4 46:5 65:25 101:12 example 9:10 34:10 35:3 42:25 92:24 examples 49:17 excess 96:21 exchange 85:1 85:16 exchanging 84:18 execute 14:23 15:6 executive 80:3 80:10 exercise 9:15 97:23 exhaustive 24:6 exhibit 16:5 17:4 33:20 53:20 64:11 86:22 exhibits 64:2 70:3 exist 12:22 exonerated 43:23 expand 12:3 expanded 37:4 expect 68:12,22 68:22 expensive 49:18 experience 45:19 45:20 experienced 47:20 expert 44:5 50:13 explain 1:22 35:2 50:8 58:9 64:6 85:9 87:14 explained 6:12 65:1 explaining 84:15 explanation 4:24 9:24 explicit 60:7 explore 37:10 42:6	express 35:16 83:24 expressed 3:24 57:21 expressing 84:5 expressions 98:11 extended 57:25 extent 8:12 45:25 57:6 extra 95:20 extremely 87:4 ex-directories 46:4 ex-directory 20:16 21:23,24 28:5,7,24 40:13,16 41:1 41:5 49:5,6,9 49:14,15 57:5 57:6 ex-inspector 62:1 ex-Special 18:25 ex-wife 68:2
E						F
					face 24:17 29:21 29:25 70:11 facing 14:13 fact 10:15 17:5 17:17 19:3 30:18 53:7 58:21,23 63:11 68:16 84:4 86:24 89:11 90:23 93:20 94:16,24 facto 85:8 facts 5:6 81:1,6 82:18 88:25 89:2,10 90:11 92:14 factual 87:3,9 89:10 failed 56:4 fair 33:18 35:15 39:6 51:10 93:17 95:4 98:10 fairly 57:19 fall 99:25 false 59:19,23 familiar 67:6,8 family 20:22 25:14,14 28:11 28:12 43:1,2,5 68:10 91:1,9 94:17 98:4 far 8:2 25:24 26:20 27:11 33:1 49:16 53:4,15 77:25 Farrer 69:10,23 69:24 75:9 86:14 97:21 Farrers 65:12	

71:1 75:15,17 75:20 79:10 84:11,14 85:24 86:2,3 favoured 91:12 fear 55:15 feature 8:10 February 33:1 feel 7:24 25:17 45:23 55:12 56:21 98:15 feeling 40:20 fee-paying 89:25 fell 14:25 fellow 90:7 fight 63:5,6 95:17,19 figure 26:18 46:14 47:17 50:15 51:7 52:7,8 figures 46:25 47:2,3,8,9,10 47:10 52:25 53:8,9,10,12 53:13,25 54:19 54:20,24 file 40:2 71:4 files 11:11,21 final 53:10 75:7 81:23 86:21 95:24 find 9:21 15:19 21:20 28:8 39:10 44:1 55:3 61:11 77:21 90:3 92:22 96:5 finding 10:15 fine 1:15 24:19 39:10 fingers 73:25 finished 12:15 29:3 firm 72:15 74:23 74:24 85:3 86:14 92:20 first 2:14 3:2 11:20,21 16:9 25:17 26:4 29:19 34:17,18 34:19 35:17 36:13 37:16 42:9 51:6 55:12,25 58:1 58:5 59:12,22 59:22 62:14 64:10 76:11 77:13,15 80:14 82:13 87:16,17 87:19 93:22 97:21 firstly 2:17 85:8 fish 34:6 fishing 62:23 five 32:10 38:19 38:21,25 39:10	41:24 51:5 63:19 fixed 13:2 flabbergasted 78:3 flat 28:9 flight's 72:3 floating 89:18 flowing 51:6 focus 30:22 focused 5:12 7:5 focusing 31:8 follow 33:25 34:5 36:19 44:7 53:11 following 10:25 35:3 68:7,8,12 following 12:21 31:18 37:12 70:4 75:13,14 80:11 102:6 follow-up 75:15 footage 68:1 force 8:24 39:8 forensic 27:3 29:4 forgotten 36:25 form 13:4 formally 21:1 78:22 former 66:24 103:10 fortnight 101:25 Fortunately 94:13 forward 11:16 11:16 17:4 42:7 91:1 92:8 94:16 found 2:18 17:19 40:22 50:24 90:4 four 21:7 32:10 32:16,17 33:23 51:5 52:4 53:2 54:3,21 56:3 58:24 61:5 68:14 70:17 78:12 81:5,15 101:19 four-day 102:3 Francis 13:19 22:13 35:21 100:20 frankly 4:16 37:13 52:18 free 93:12 Freedom 46:10 46:24 frequently 6:15 Friday 1:5,13 72:5 101:17 friend 28:21 76:19 friends 20:22 28:11,12,22	43:1,2,6 frightened 63:4 Frome 25:11,25 front 38:21 62:1 fruit 40:3 full 11:13 26:10 58:9 86:1 fully 7:21 26:7 full-time 13:13 fulsome 55:3 fund 91:7 funded 99:25 funding 83:9 99:8 100:13 funds 91:9 further 16:7 17:4 19:7 46:8 49:3 52:22 55:2 72:5 75:16 77:8 84:21 95:21 <hr/> G <hr/> gained 84:19 Garnham 10:20 gather 65:22 gathered 35:19 gathering 40:20 gazing 71:2 Gazzard 15:8 25:11 Gemma 94:18 general 41:13 66:7 George 72:16 78:15 getting 38:21 45:15 58:7 59:1,4,5 62:12 92:23 GIO 99:21 give 8:17 26:16 41:25 48:16 49:3 51:7 56:12 62:7 64:12 92:15,19 97:9 100:9 given 16:5 33:7 53:8,10 64:7,8 64:11,13,17,20 65:2,16,22 74:3,14 80:13 83:1 100:11 101:6 gives 36:4 giving 10:5 22:20 59:17 Glade 30:11,15 31:5,5 32:12 32:15 33:11,22 glance 25:12 glanced 15:25 Glenn 40:6 44:5 94:19 global 92:11 go 24:14 27:20 29:17 34:23	35:5,8,10 38:14,22 39:24 49:11 58:11 61:12 63:2,9,9 69:13 74:19 76:7 78:4 81:6 82:12,20 83:3 83:16 87:17 88:15 89:13 91:8,9 92:2 95:22 godfather 91:14 goes 26:19 88:7 going 4:12 5:17 7:24 10:16 11:9,10 18:20 19:14 21:4 22:2 23:13 25:24 26:4,24 33:2,12 36:22 36:23 37:10 38:25 39:1 42:17 43:9 44:2 45:2 46:3 46:15 47:10 52:13 54:1,9 56:12,16 59:20 60:19 61:9,15 63:4 64:12 65:25 68:21 70:1 75:11 77:12 81:12 84:3 94:3,4,15 95:8,9,11 96:18,21,25 97:8 98:25 100:6 101:13 101:17,18 102:2 good 35:4 38:22 45:20 47:21 63:23 66:12 72:24 73:1,3,4 86:7 94:14 95:7 Goodman 41:16 Gordon 41:15 77:18 78:22 79:1 80:1 81:11 82:23 83:6 grace 94:14 grain 89:22 grammar 89:24 grandson 63:5 Grant 1:19 2:1 2:17 3:3,5 5:4 5:14 7:8 8:6,8 9:7,14 10:3,22 10:25 28:8 Grant's 2:2 9:17 graphically 81:17 grateful 11:17 great 38:1 82:19 greatest 82:23 green 21:9	Gregory 79:11 80:16 81:7,9 82:14,22 grievance 34:16 34:17,19 58:21 58:21,23,24,25 59:1,3,10,12 59:14,14,18,22 59:23 60:8,8 grievances 34:17 34:23 grounds 99:18 Group 69:11 70:15 73:10,11 73:16 76:1,9 76:12 77:1,22 78:10 79:13,24 80:1 83:14 grouped 51:21 Guardian 41:10 70:23 71:19 82:5 Guardian's 70:19 guide 84:1 guilty 48:3,4 gutter 44:1 <hr/> H <hr/> hack 41:18 57:10 hacked 3:19 40:24 98:7,8 hacker 41:24 44:5 hacking 2:4 4:3 5:1 6:8 40:18 40:21,22 41:3 42:16 57:12 63:10 72:19 86:10 87:20 88:2 94:25 half 73:8 Hampshire 19:9 19:18 hand 11:10 93:8 95:16 handed 31:15,25 66:20 68:17 handful 30:13 handing 63:12 63:15 hang 49:24 happen 39:8 66:10 68:8 happened 30:12 33:21 61:19 90:25 91:23 happening 33:17 74:6 happily 58:3,9 happy 56:10 hard 40:2 101:4 hardback 21:7 harder 57:10 Harris 64:12 70:7 72:15 73:14 75:17	77:12,17 79:9 79:18 82:2 84:18 85:17 88:6,21 100:21 Harris's 65:1 hatred 5:11 head 13:15 22:10 35:6 50:17 headed 64:10 70:7 heading 75:25 78:6 88:17,23 heads 63:7 hear 1:3 4:24 36:3 39:7 77:12 heard 33:14 75:21 hearing 1:5 5:5 34:22 102:13 heart 88:5 93:8 helicopter 14:14 hell 52:18 Hell's 44:12,13 44:14 help 17:21 20:1 45:22 helped 88:1 helpful 48:25 higher 46:14 highest 4:16 highlight 41:22 highly 84:19 hindsight 84:22 hit 39:21 holding 90:22 home 19:9,18 honest 60:22 86:7 Honour 33:21 hope 6:21 11:12 11:19,22 26:9 57:18 hopeless 77:17 Hoppen 76:9,12 76:23 horrific 68:6,6 68:19,20 horror 24:16 hot-tubbed 101:8 hour 92:21 hourly 92:20,21 95:11 house 62:15 68:16 huge 43:18 52:20 73:23 Hugh 28:8 hundred 17:6 hypotheses 42:7 hypothesis 44:3 <hr/> I <hr/> ICO 12:22 13:17 19:22 34:19 38:1 53:6,19	61:23 62:16,23 63:3,6 ICO's 38:6 51:20 51:22 52:7 53:10 62:24 idea 92:19,21 identified 8:15 17:5,17 19:3 27:22 29:11 36:7 61:5 identify 11:20 17:12,13 19:15 23:5 identifying 21:14 46:21 idiocy 70:25 ignore 63:8 illegally 45:9 49:10,11 illustrate 24:7 illustrative 10:11 imagine 9:7 21:11 28:20 99:9 immediate 29:16 immediately 17:1 97:11 impact 8:17 11:1 88:12 implications 10:22 importance 7:21 important 3:7 10:1 65:9 93:3 impossible 39:4 39:13 57:9 85:13 inaccuracies 87:3,10 inaudible 61:15 include 37:4 included 76:25 including 11:11 33:24 96:5 income 73:1 incorrectly 54:20 increase 54:25 incriminate 20:25 incriminated 43:21 independent 29:4 59:21 61:17,18,25 62:10 indicate 79:23 indicated 21:2 indication 92:16 indirect 44:13 indirectly 16:21 individual 27:12 46:14 47:22,23 50:18 51:3,4 53:14,15 101:10 individually
---	---	---	---	---	---	---

51:24 52:12 individuals 17:8 23:24 36:15 51:5 76:25 infer 49:21 inference 2:20 3:1 5:6,6 6:13 6:14 8:21,21 94:19 inferences 94:23 information 11:17 12:8 19:12 20:12 24:1 27:23 28:2 29:15 30:4 37:17 38:7,9 43:9,11 45:9 46:11,24 48:6 49:4,22 55:21 60:9 70:19,23,25 71:21 74:12,12 84:19 85:1,16 85:17 87:25 informed 29:10 ingested 99:14 inherit 91:5 initial 61:10 76:17 input 35:14 inquire 31:13 inquiry 2:14 3:15 6:25 7:10 7:11,21 25:9 41:3 53:15 57:25 58:4,4 63:11 66:22 67:5 68:4 75:21 84:17 85:11 92:15 99:8 101:3 insist 57:14 Insofar 80:19 inspector 12:20 instance 55:25 instigated 85:24 instinct 45:21 instruct 73:16 74:21 75:10 instructed 72:20 74:6,20,24 75:9 85:4 instructing 66:19 instruction 72:18 instructions 23:25 75:18 79:4,12 83:5 insufficient 39:11 insuperable 1:7 insurance 96:15 96:17,18,25 insure 94:1 intended 9:1 intending 60:14	intention 6:25 7:1,2 intentional 73:22 interaction 69:20 interactive 101:15,17 interception 73:21 interest 38:5 56:15,23 81:19 82:1,24 89:19 interested 78:5 interesting 37:22 64:24 89:21 99:20 interfere 6:25 internal 80:11 International 44:4 52:24 65:12 68:18 69:18 88:3 90:17 98:3 102:9 Internet 14:9 interrogation 43:19 interval 1:22 interview 29:12 interviewed 30:5 30:13,20 intimidate 7:1 intimidated 7:23 intimidatory 8:25 invariably 49:15 inverted 7:8 investigate 31:15 38:24,25 39:10 39:16 55:13 69:16 75:4 investigated 38:16 39:9 78:14 investigating 12:8 13:8,10 14:8 62:4 investigation 14:4,9,24 30:6 30:7,10 36:10 37:8 54:18 61:24 65:15 70:7 77:6 87:7 investigations 22:10 35:4,6 74:22 75:4,16 75:20 investigator 13:2 18:17 25:21,23 62:2 67:16 investigators 13:13,16,17 31:2,3 33:16 36:24 60:22 74:21 investigator's 69:6	invite 11:9 inviting 60:11 invoice 22:24 23:12,15 invoices 22:22 involve 54:22 97:25 involved 2:4 5:25 6:8 34:7 36:8 48:16 75:20 86:9,10 88:14 90:15 92:17 involvement 35:21 involves 95:25 in-house 69:25 85:25 irrefutable 35:18 issue 1:17 5:13 11:2 28:23 51:17 57:4 79:15 84:25 94:9 issued 19:24 issues 23:12 54:16 77:11 89:16 item 37:21	jointly 36:8 jokes 87:11 joking 29:20,21 journalist 23:5 30:5,9 37:2 43:22 47:25 48:2 54:22 55:13 69:21,22 74:15 85:25 86:1,5,9,16 journalists 27:12 27:18 29:13 30:14 36:18,21 37:5,8 38:8,16 39:22 40:14 43:20 45:6,8 46:1 87:21 journey 70:3 judge 30:12 33:21 judges 6:15 judging 11:2 judicial 94:24 Julian 69:10,24 70:10 71:1,19 73:24 76:6 86:2,5 July 71:10,14,15 72:2 justice 1:7,15,20 2:5,8,10,15,24 3:6,9,16,20,23 6:11,23 8:5 9:6 9:12,25 10:7 10:10,21,24 11:4,6,15 15:13,16 16:22 18:9 19:11 25:21 27:20 28:2,16 39:3 39:14,23 40:2 43:3,8,13 44:18,20,23 46:22 47:2,5 48:5,10 52:15 54:13,24 55:8 56:13,18 58:18 59:7,25 61:1 63:17,19,25 64:4,14,16,19 64:21,24 65:5 65:9,19,21 66:3,9,12,14 66:16,21,25 67:3 68:24 69:4 77:4 82:4 82:8,11 87:4 87:11,14 88:16 91:19,24 97:5 97:6,11,15,20 97:24 98:13,15 98:18,22 99:2 99:11,15,20 100:5,8,15,18 101:1,4,7,16 101:19,24 102:4,10	justification 85:7 85:9	launch 13:24 law 13:3 72:15 81:2 82:18 85:3 92:20 lawful 48:17 100:12 lawfully 28:3,5 28:13,18 48:5 48:7,13 49:6 lawyer 70:20 85:25 86:13 93:11,23 96:2 96:13 lawyers 87:19,22 87:25 93:17 95:18 96:19,19 lead 15:4 47:19 62:1 leading 77:15,20 83:20 league 50:19 leak 70:22 79:1 leaks 14:10 learned 76:19 leave 5:3 9:19 58:1,5 led 5:6 18:16,17 18:20 left 12:13 34:13 35:7 37:15,16 76:3 leftfield 4:6 legal 9:23 32:25 38:17 80:20,22 80:22 94:12 96:8 legislation 13:3,5 legitimate 84:25 Leigh 100:24 lend 8:24 letter 53:22,23 54:13,17 55:1 55:5,7 83:16 84:10,12 let's 50:3 57:13 60:19 99:11 level 80:9 Leveson 1:7,15 1:20 2:5,8,10 2:15,24 3:6,9 3:16,20,23 6:11,23 8:5 9:6 9:12,25 10:7 10:10,21,24 11:4,6,15 15:13,16 16:22 18:9 19:11 25:21 27:20 28:2,16 39:14 39:23 40:2 43:3,8,13 44:18,20,23 46:22 47:2,5 48:5,10 52:15 54:13,24 55:8 56:13,18 58:18 59:7,25 61:1	63:11,17,19,25 64:4,14,16,19 64:21,24 65:5 65:9,19,21 66:3,9,12,14 66:16,21,25 67:3 68:24 69:4 77:4 82:4 82:8,11 87:4 87:11,14 88:16 91:19,24 97:6 97:11,15,20,24 98:13,15,18,22 99:2,11,15,20 100:5,8,15,18 101:1,4,7,16 101:19,24 102:4,10 Lewis 1:3 63:24 64:1 65:7,17 66:15,17,21,24 67:5 68:24 70:7,19 71:10 73:9,13 74:19 76:22 78:19,22 81:8 82:14 84:18 85:3 86:22 88:6 91:20 92:13 97:15 98:2,4 103:10 Lewis's 83:22 Lewis's 64:2 66:17 97:19 98:8,9 Lewis/Gordon 78:7 Lewis/Harris 81:19 liaise 18:2 liaison 30:16 79:23,25 libel 93:4 96:22 96:24 licence 95:13 licensing 31:9 life 69:17,18 71:7 85:12 91:11 92:25 light 97:18 Likewise 79:8 limited 14:18 17:6 65:15 69:11 76:2 line 5:22 13:19 21:11 22:23 29:16 30:24,25 31:1 45:3 76:4 lines 70:17 78:12 81:5 87:23 101:12 link 44:13 linking 89:2 Linklaters 84:11 list 16:10 17:14 18:7,11 19:14 19:14 28:12,14
		J		K		
		Jay 1:3 4:15 5:23 11:5,8,9,20 15:15,18 17:1 18:16 19:17 26:3 28:17 40:5 43:18 44:19,24 46:23 47:9 48:14 52:16,17 54:23 55:2,11 56:21 60:1 61:2 62:6 62:9 63:18 98:20,21 99:1 99:3,13,19 100:2,7,14,17 100:19 101:2,5 101:12,17,23 102:2,6 103:5 103:9 JCP 76:5 78:9,21 81:16 83:5 Jean 13:14,18 29:16,20 35:7 Jemima 2:23 3:12 Jeremy 79:9,18 JMW 72:15 73:12 Joanne 79:5,6 job 22:2 24:21 27:4 63:3,3 68:12 John 11:14 joined 12:13 13:1,6,7,7 86:19 joint 72:18	keep 14:15 25:24 30:17 36:23 81:19 82:3,10 86:24 101:24 Kelly 76:9,12,23 kept 38:18 key 81:18,19 82:1 Khan 2:23 3:12 killing 25:16 Kingdom 13:11 knew 26:16 32:13 33:8 45:8 59:14 62:11 63:10 78:11 90:1 94:3 knock 62:12,18 know 2:3,8 4:20 4:22 5:17 14:20 18:25 20:3 25:1 28:8 28:13,13,19 30:6,17 32:3 32:13,15 33:12 33:13,14,16,19 35:11 37:24 38:13,17 39:2 40:6 42:2 43:25 46:14 47:14 49:16 51:16 52:23 56:11 59:4 60:20 61:20,21 63:1,4 64:15 64:18,23 65:3 65:8 66:19 67:21 68:11,20 76:14,22 77:25 84:3 86:25 92:9 94:4,6,15 94:16 95:8,10 99:4,16 knowing 86:1 knowledge 5:25 67:9 known 49:6 61:24 85:2	labelled 14:5 lack 55:14 60:25 lady 3:12 18:4,15 77:9 landed 72:4 landline 57:10 57:15 landlines 57:7 large 27:11 largely 90:9 102:8 late 55:16 laugh 101:9	L	

39:21 42:11 43:1 listed 76:3 listening 37:24 44:8,10 lists 20:22 little 23:6 31:3 34:6 37:20 41:8 42:6 45:23 55:16 75:1 lived 25:11 lives 86:13 lobbying 89:5 locked 29:5 Lockett 13:14,18 29:16 35:7 London 14:19,21 15:9 31:17 lone 41:17 long 18:7,11 30:19 34:20 63:8 long-term 34:15 look 15:21 16:24 19:7 22:20 24:16 26:5 37:21 38:10 43:14 46:4 47:24 48:1 50:4,18 51:17 52:22 60:20 69:20 70:1,13 71:5,7,8 73:12 73:23 74:21 85:18 96:16 looked 4:13 27:21 29:19 44:21 59:22 84:16 85:22 looking 6:5 22:20 51:15 52:12 53:21 55:2 70:3,6,17 75:18 80:13 84:10 85:12,15 86:12 93:10 looks 49:17 98:21 LORD 1:7,15,20 2:5,8,10,15,24 3:6,9,16,20,23 6:11,23 8:5 9:6 9:12,25 10:7 10:10,21,24 11:4,6,15 15:13,16 16:22 18:9 19:11 25:21 27:20 28:2,16 39:14 39:23 40:2 43:3,8,13 44:18,20,23 46:22 47:2,5 48:5,10 52:15 54:13,24 55:8 56:13,18 58:18	59:7,25 61:1 63:17,19,25 64:4,14,16,19 64:21,24 65:5 65:9,19,21 66:3,9,12,14 66:16,21,25 67:3 68:24 69:4 77:4 82:4 82:8,11 87:4 87:11,14 88:16 91:19,24 97:6 97:11,15,20,24 98:13,15,18,22 99:2,11,15,20 100:5,8,15,18 101:1,4,7,16 101:19,24 102:4,10 lose 52:20 94:1 95:17 97:4 lost 53:21 94:8 96:3 lot 16:1 21:12 23:10 25:13 40:17,19 52:18 77:23 78:1 95:22 lots 93:11 love 4:20,23 lower 30:23 low-lying 40:3 Luce 98:19 <hr/> M Mail 1:18 5:25 6:7 7:13 90:22 Mail's 4:24,24 main 12:2 majority 60:22 making 3:24 10:15 53:1,3 66:6 85:21 94:19 man 44:15 84:1 91:14 managed 22:21 25:14 management's 63:2 manager 13:19 29:16 manpower 39:17 March 19:20 31:18 73:11 Maria 25:15 mark 20:15 48:17 63:24 66:24 70:19 75:21 78:7,19 83:22 88:6,6 88:21 103:10 marks 15:24 18:8,23 27:24 massive 94:5 match 22:21 23:4	matched 23:15 material 8:23 10:14 11:11 26:19,24 27:14 41:6 55:9 97:23 materialised 73:15 matter 1:14 3:13 3:20 20:3 32:9 33:2 34:4 52:15,17 53:18 77:7 78:14 80:8 84:7 90:12,13 95:7 matters 14:25 37:12 56:13 58:16 76:3 77:5 Max 71:12,14 72:8,11,14,17 74:10 maximum 52:8 McMullan 2:20 3:2,4 10:2 44:9 44:10,14 87:14 McMullan's 3:4 6:10,11 mean 4:20 10:8 18:9,10 20:17 39:9 40:24 62:2 68:8,9,15 69:19 81:23 89:22 93:8,23 means 2:21 3:10 19:1 39:1 42:16 46:20 52:6 meant 38:5 mechanisms 8:7 media 5:11,15 92:20 meet 35:11 44:2 meeting 22:11 77:9 93:22 member 18:1 20:25 78:16 99:17 members 32:16 80:3,5,10 99:22 mendacious 5:10 5:14 6:20 7:12 mention 29:2 mentioned 8:11 14:17 17:5 23:23 26:18 31:5 merits 8:19 messenger 30:1 met 7:24 83:21 83:21,25 Metropolitan 19:4,5 33:15 microphone 14:14 middle 23:3	76:16,17 mid-March 22:10 Miller 95:1 million 91:17,18 Milly 40:25 91:2 91:3 94:10 Milly's 91:10,11 mind 11:1 31:16 42:11 50:13 86:24 mine 52:3 86:10 minimum 52:6 minutes 63:19 misinterpreted 3:5 missed 9:8 74:17 missing 91:12 mistake 87:11 mistaken 9:18 misuse 31:8 mitigation 9:9 ML 76:18 mobile 20:16 21:24 28:17,20 40:13 57:11 71:20 modern 89:13,13 moment 5:16 7:11 8:3 10:12 47:11 68:20 70:2 75:11 81:5,12 82:17 96:7 99:5 101:25 Monday 2:7 72:4 100:20 102:14 money 77:23 85:21 91:5 93:9 95:13 months 17:20 92:20 34:19 58:24 morass 26:19 Morgan 17:25 18:7,9 25:10 morning 1:16 10:19 53:21 mother 25:15 motive 73:10 81:22 Motorman 13:25 17:10,11,15 18:22 26:1,2 30:8,16,22 32:17 33:11,23 34:3,8,25 35:2 36:10,14 40:8 40:9,18 41:5 41:23 42:2 50:6 62:2,3 63:9 mouth 5:18 move 75:7 90:12 moved 8:12 19:16 moving 97:6 Mulcaire 44:5	76:25 94:19 Mulcaire's 40:6 murdered 91:5 Murdoch 81:11 91:7,7 mustn't 86:16 MXL 76:17 <hr/> N N 103:1 name 11:13 19:15 20:20,20 21:16,22,24 48:8 50:23,23 56:11 61:20,22 65:3 76:16 86:11 88:7 names 27:12,23 40:17,25 41:3 56:11 77:7 naming 74:14 narrow 51:15 national 14:10 31:8,12 nature 21:20 navel 71:2 near 29:18 nearly 52:19 69:19 necessarily 96:6 necessary 5:7 60:15 need 23:1 44:6 52:20 58:11 77:13 80:16 81:7 86:3 99:16 101:10 needed 42:20 43:20 61:11 negative 81:20 negotiation 92:10 negotiations 90:25 91:6,16 92:7,9 94:6 neither 8:20 neutralised 31:20 never 6:24,25 36:19 37:4,8 38:14,16 39:8 40:7 42:5 54:5 57:12,22 59:8 61:8,9 70:24 83:21,21 new 13:6 35:6 85:4 News 42:10 44:4 52:24 54:20,25 65:12 68:18 69:11,18 70:15 70:16 73:10,10 73:11,12,16,16 73:24 76:1,8 76:11 77:1,21 78:10 79:13,24 79:24 80:1	83:14 88:3,18 88:23,25 90:17 94:4,9 98:3,3 102:9 Newsnight 71:10 71:15 72:7,8 newspaper 7:17 21:15,16 22:24 23:5,13,21 24:15 43:9,10 61:18 70:23 76:12 80:4 92:10 95:15 newspapers 2:3 2:12 3:18 8:6 9:22 22:22 29:11 76:2,9 77:22 83:14 95:12,12,18 NGN 81:25 83:8 84:21,21 Nick 41:10,19,19 Nicola 74:9,14 74:15,16 86:11 nine 17:20 NMT 92:24 nonsense 79:7 normally 65:12 note 37:20 75:12 notebook 23:25 notebooks 21:5,8 21:13 23:16 noted 55:4 notes 69:23,25 76:7 86:5,19 94:19 notice 59:6,8 99:4,16 noticed 18:7,22 25:13 31:16,19 notices 59:10 noticing 18:19 notified 71:19 Nott 100:24 November 2:6 11:23 12:5 15:4 31:17 32:1 62:15 67:14 number 16:6 17:21 18:19,24 19:13 20:17,19 20:19,21 21:17 21:19,21,24 27:12,16 43:1 43:5 45:25 49:6,9 51:18 52:7,8 74:23 76:10,24 77:3 98:11 numbered 80:14 numbers 15:25 18:12 20:16,16 27:25,25 28:4 28:7,17,24 40:13,16,21,23 40:25 41:1,5	41:18,24 42:15 42:21,24 44:15 51:1,13 57:5,7 94:20 nurses 93:18 nutshell 61:19 <hr/> O oath 66:22,24 103:11 object 66:1 99:22 objected 79:11 objective 26:13 81:18 obligation 92:5 obligations 75:11 81:9 observation 54:14 obtain 28:18 45:14 48:5,7 48:13 obtained 15:6 20:13 28:3 43:25 45:9 46:10 49:22 50:5 86:20 obtaining 48:2 obvious 52:5 74:17 obviously 15:21 15:24 16:20 18:20,21 25:1 25:9 30:15 31:12,20 32:11 42:5 45:20 46:6 47:24 50:15,19 63:7 68:9 77:5 88:14 102:7 occasion 10:13 occasional 41:2 occasions 46:2 74:24 occupancy 28:10 October 12:17 14:3 oddy 80:2 oddly 95:17 offence 48:4 61:13,14 offences 38:4 offenders 39:18 offer 91:16 offered 25:18 office 12:9,24 14:24 18:5,5 18:13 22:8,20 30:4 33:16 35:9 45:20 53:10 57:19 59:5 60:9 officer 12:8 13:8 15:7 18:25 20:4 47:20 62:4 officers 13:10
--	--	--	--	--	--	--

14:11,12 15:5 16:3 20:1,2,6 60:23 62:19 offices 68:17 official 52:7 oh 1:11 29:22 34:12 43:7,24 46:12 47:1 48:12 56:8 59:20 64:16,21 79:25 102:4 okay 4:19 35:15 37:11 58:12 60:13 old 4:12 49:8,12 once 19:5 26:16 27:2 70:6 ones 76:11 96:5 online 7:13 open 71:4,4 74:13 84:23 85:19 operation 13:25 14:5 15:1 17:10,11,15 18:22 26:1,2 30:8,11,22 31:5,5 32:12 32:15,17 33:11 33:11,22,23 34:3,8,25 35:8 40:8,9,18 41:5 41:23 42:2 50:6 62:2,3 opinion 6:5 7:19 83:24 84:5 98:11 opportunity 1:21 25:12 opposed 10:4 oral 98:6,10 orchestrated 101:13 order 7:9 29:24 65:14 66:23 74:7 80:19 83:24 84:21 99:7,8 ordinarily 86:7 origin 64:23 original 53:5 63:13,16 66:18 originally 76:23 originate 64:9 origins 64:15,25 ought 68:18 77:22 78:2 80:10 84:3,5 oust 73:20 outed 59:18 outlawed 96:14 outrageous 82:3 outside 14:14 outstanding 34:4 outwith 15:1 overall 47:22,23 47:24 50:15	55:10 81:4 overnight 26:14 overwhelming 35:18 owe 91:25,25 Owens 1:4 11:5 11:7,9,14,15 11:20 14:8,13 20:18 27:20 28:25 31:6 33:18 35:15 37:14 39:6 40:9 42:6 43:4 49:25 52:21 54:6,12 55:11 62:6 103:8 owner 48:9 owners 16:2 o'clock 102:13 P pack 26:17 page 5:22 21:6 37:21 51:8 62:1 70:6,13 73:7,7,8 75:2,7 75:23 77:14,15 78:4,4 80:11 81:12,14 82:12 82:13,21 83:3 83:3,16 84:10 84:13,13 86:23 87:17,18 88:15 88:17,17 pages 11:23 89:6 paginated 70:5 pagination 70:4 80:12 paid 92:11 93:9 93:17 95:8,9 95:14,23 Pandora's 20:9 Panorama 44:24 49:25 paper 22:23 23:8 62:22 papers 22:25 23:4 25:12 32:25 40:23 50:18 paperwork 21:12 25:6,19 32:21 paragraph 14:2 17:3,22 20:13 26:3 27:6 29:9 31:6 32:2 33:5 35:16 37:14 50:8 52:25 54:12 56:6 70:13 71:8,9 73:9 74:19 75:8,14,18 77:15 78:8 79:22 80:14 81:5,15,23 82:20,21 84:13	84:14 87:24 88:4,8 paragraphs 80:15 81:15 Parliament 97:8 part 4:17 30:10 35:22 36:17,19 36:22 38:23 59:18 84:12 participant 90:14 participants 29:1 100:23 participate 25:7 particular 16:5 16:13 18:17 22:2 24:2 30:10 33:20 70:16 84:20 90:15 particularly 29:1 partly 67:18 partner 92:19 partnership 78:16 parts 80:21 party 89:18,20 pass 24:20 65:11 passage 5:21 passed 40:24 passing 40:23 Paul 6:10,11 Pause 1:10 pay 83:14 94:2 95:18 96:6,25 paying 23:1 payment 23:21 96:4 peace 20:6 pending 7:14 penny 4:14 people 22:22 23:7 27:25,25 31:4 32:8,10 32:12 37:24 38:17,19,21 39:17,25 40:24 40:25 42:1,17 44:1 56:3,5 57:1 59:2 61:5 62:15 63:1 88:14 91:12 93:12,18,24 94:13 96:9,22 97:4 perception 70:15 perfectly 5:7 66:22 perforce 102:8 period 2:22 58:1 permissible 5:7 perpetrators 32:10 persistently 46:6 person 17:1 19:12 34:18 51:1 67:19	82:23 personal 5:25 16:2 40:20 50:5 90:6 persons 36:7 69:14 persuadable 83:10 persuade 77:22 82:16,25 83:2 persuaded 77:19 Peter 100:21 phenomenal 77:20,20 Phillips 74:9,14 74:15,16 86:11 phone 2:4 4:3 5:1 6:8 18:3 20:16 28:15,17 40:13 42:15 44:15 57:5,7 57:11 71:20,22 72:19 73:21 86:10 87:20 88:2 93:12 94:25 98:7,8 phones 3:19 28:20 photostatted 27:2 photostating 25:19 phrase 7:4,12 101:8 physical 98:1 pick 80:12 81:15 picking 87:23 piece 4:17 Pike 69:10,24 70:10 71:1,19 73:24 76:6 77:9 86:2,5 place 13:5 19:20 27:13 32:4 40:6 55:12 91:6 plan 89:4 plane 71:22 planning 89:1,11 plea 9:9 please 1:22 11:13 12:11 14:15 21:3,5,20 30:1 52:25 62:9 70:9 71:8 73:7 73:8 74:19 75:2,24,25 83:19 87:18 88:15 89:8 plummy-voiced 2:25 6:9 plus 13:17,18 pm 1:2 63:20,22 102:12 PNC 31:13 point 6:21 23:23 24:16 36:5,18	39:6 43:18 51:17 54:6 56:14 61:2 65:23 74:17 83:18 87:16 92:15 98:5 pointed 86:23 points 54:11 55:11 74:17 89:6 police 12:12,13 12:16 14:4,10 14:11,12,22 15:6 16:3 19:4 19:5,22 20:1,2 20:6 30:10,13 31:8,12,15 33:15 39:8 45:19 47:20 62:18 63:3 64:8,9,13,19 64:22 65:7,14 65:14,17 67:14 67:23 68:17,21 87:21 policy 63:8 97:1 polite 62:20 political 89:3,17 89:18 politics 89:19 Pollit 25:18 26:2 62:3 pool 91:11 position 1:3,23 51:23,25 54:8 66:13 77:18 83:8 96:11 possession 18:14 possible 14:9 42:7,20 52:13 58:10 71:3 83:23 85:1 possibly 4:5 31:9 40:23 94:25 post 37:18 85:8 potential 3:21 57:20 73:14 80:13 84:22 87:6 practice 93:9 practices 9:10 preaching 47:11 precisely 3:25 precision 15:3 prejudice 87:6 preliminary 15:13 premises 16:8 premium 96:18 96:19,20,20 premiums 96:15 prepared 7:11 26:16 32:6 65:4 89:23 preparing 4:11 5:5 prepped 26:7	presence 27:13 present 94:23 100:15 presently 97:8 press 4:13 8:14 20:25 21:3 27:19 29:18,19 29:23 30:25 35:22 43:16 44:1 81:11 91:22 pressure 89:1 presumably 24:6 presumes 90:19 pretences 59:19 59:23 pretty 70:18 prevent 20:5 63:15 73:18 preventing 73:12 previous 12:11 72:19 74:24 81:23 85:3 previously 2:12 78:21 price 37:17 50:15 51:12 print 95:13 printed 46:19 pristine 26:10 privacy 37:17 50:16 51:12 69:14,14 94:11 96:22,24 97:3 private 14:10,17 19:8 31:2,3 36:16 49:8 67:16 69:6,17 74:21 85:12 89:14 91:8 93:9 privately 93:9 privilege 37:9 65:16,23 87:5 91:25 privileged 65:13 probable 47:16 47:21 probably 15:16 22:9 28:6 52:5 52:15 93:1 99:17 probative 85:10 problem 63:8 93:19 101:7 problems 82:17 procedure 1:12 103:3,7 proceed 33:2 38:6 proceeded 95:2 proceedings 7:20 38:3 58:13,15 58:17,18 60:3 60:15 78:19 process 88:9 produce 3:14	54:2 produced 29:3 69:5 86:25 product 29:3 profession 83:22 84:2 professional 75:10 77:10 79:16 84:1 92:5 profit 91:4 programme 44:24 45:6 50:1 progress 22:11 30:21 projector 70:9 promise 101:24 prompt 35:2 prompted 45:2 54:17 propagated 87:20 proper 86:7 properly 99:13 proposed 83:15 96:15 proposing 1:23 proposition 8:13 prosecute 38:23 39:1 prosecuted 36:8 36:10 37:2 38:21 45:6 prosecuting 38:15 prosecution 26:8 26:25 32:22 prosecutions 34:11,13 38:6 38:8 protect 59:13 protected 17:21 18:19,24 19:13 70:22 97:3 protecting 80:4 protection 12:24 13:4 16:23 19:24 32:8 48:24 62:19,22 provide 1:9 provided 37:1 47:2 48:9 65:13 67:5 provision 74:11 PS28 17:5 19:14 public 2:13 4:10 24:14 27:14 38:5 56:14,23 61:16 74:9 99:17,22,24 100:13 publications 54:18 publicised 61:22 publicity 7:3 81:20
--	---	---	---	---	--	---

publicly 89:4 97:23	43:10 56:10 58:3,9 65:6,18 75:5 81:17 92:17 101:4	recommend 9:22	relevance 84:23 85:13,14	resolve 52:13	risk 95:5,7	75:24 78:4
published 1:18 2:1,22 42:19 46:12,19 50:15 53:1,5	quote 37:25 quoted 10:4	record 20:15 48:2 74:9 75:3 75:22 93:23	relevant 11:11 15:14 18:21 26:11 43:20	respect 7:16 35:21 82:14 91:2,3	risky 86:18	search 14:23 15:14,20 19:24 62:21
publishing 61:25	quoted 10:4	recorded 2:19 6:13 54:19 75:9	reliability 57:20	respectful 8:1	RJT29 53:20	searches 16:14 20:7 28:8 74:25
purpose 41:25 43:25 47:12 65:16 69:15	quote 37:25 quoted 10:4	records 16:17 28:4 31:11,14 31:25 46:4 48:11,12,13 50:25 85:19	rely 89:11	respects 89:15	RJT49 33:20	searching 21:23
purposes 46:22 66:8 100:16	quote 37:25 quoted 10:4	recovered 22:16	remainder 26:23	respond 7:2 8:9	rogue 41:17	seat 76:20
pursuant 46:10 48:17	quote 37:25 quoted 10:4	recovery 96:15	remained 59:15	responded 8:13	room 57:1	second 2:20 3:1 3:10 7:7 17:16 17:20 29:7 36:5 42:14 44:3 51:11,17 61:3 64:3 67:5 76:11 79:13
persue 28:25 74:7 96:9,13 96:17	quote 37:25 quoted 10:4	red 21:9 30:24	remind 1:24	response 8:16 24:11 55:19 99:10,12	rose 1:16 10:19	secondary 89:12 89:13
pursued 94:8	quote 37:25 quoted 10:4	redact 74:22	remittance 23:18	restriction 99:7 99:16	roundabouts 96:1	secondly 36:18 98:1
pursuing 93:13 95:23 96:3,12	quote 37:25 quoted 10:4	reduce 81:20 82:3	remove 7:12,17 8:3	result 34:1 38:22	Rowena 76:15	seconds 61:25
pursuit 14:23	quote 37:25 quoted 10:4	reduced 95:20	remit 15:1	results 17:7 84:23	Roy 25:18,25 26:2 30:7 39:20 62:3	section 38:4 48:22 55:21 61:12 74:22 78:5,6 99:4 100:4
put 3:7 4:8,16,22 5:17 27:7 34:20 35:1 38:18,19 42:7 44:3,10,12,16 51:20 53:12 57:13,24 58:1 58:21,23,23 59:9,20 60:19 61:20 62:5,12 72:9 73:1 74:2 88:18 89:1 91:1 92:8 99:23 101:5	quote 37:25 quoted 10:4	Reed 77:17 79:9 79:18	reply 9:15 99:4	retired 12:17,19 12:20 14:12	run 94:14	seconds 61:25
puts 81:17	quote 37:25 quoted 10:4	refer 5:21 17:21 44:24 54:13 67:25	report 3:25 37:16,25 42:14 49:17 51:12 55:16 64:10 69:5,9,13,15 69:21,22 70:7 71:16 72:24 75:1 85:23,24 86:20 87:17 97:22	retirement 12:21	running 7:9,10 81:10	section 38:4 48:22 55:21 61:12 74:22 78:5,6 99:4 100:4
putting 38:7 53:13 54:7	quote 37:25 quoted 10:4	reference 5:22 30:11 41:4 53:21 71:12 76:10 77:3	reported 21:14 21:15,16 41:17 50:20,23,24 53:1 54:3	return 22:25 72:6	runs 11:22	see 15:25 23:15 23:18 25:10 29:21,25 35:10 38:20 41:4 46:9 49:1,13 51:11 52:20 53:4 58:11 60:18 64:21 68:1,21,23 72:14 73:9 75:8,13,22 76:1,4,19 77:15 83:6 86:8 91:22 92:3
QC 33:22 79:11	quote 37:25 quoted 10:4	referred 7:8 98:2	reporter 21:14 21:15,16 41:17 50:20,23,24 53:1 54:3	returned 22:8 72:6	Rupert 91:7,7	seeking 8:19,20 65:24 99:8
qualify 100:2	quote 37:25 quoted 10:4	referring 4:23 46:20 55:1 80:18	reports 29:19 30:25 53:2,7	returning 88:7	RXC 76:5,15	seen 30:3 32:4 33:20 36:25 39:22 42:3 53:20,24 54:5 67:23 99:24
quality 60:17	quote 37:25 quoted 10:4	reflected 54:4	reports 55:10 72:25 85:23	revealed 41:14 54:19	S	seize 16:3
quantitative 52:6	quote 37:25 quoted 10:4	regard 9:3 82:22 97:21	represent 80:3	revealing 89:2 91:20	sack 58:8	seized 20:9 21:5
Queen's 76:24 77:9	quote 37:25 quoted 10:4	regarding 78:10 84:25	representation 83:9	revisited 54:17	sad 85:18	seizing 15:22
question 1:10 3:10,12 6:4,10 6:14 23:18 35:25 41:4 43:16 46:8 47:13 57:16,23 57:24 65:21,25 92:1 95:24 98:6	quote 37:25 quoted 10:4	regards 10:2 20:24 99:15	representing 72:11	re-examine 50:2	safely 29:5	sending 22:24 23:1
questions 11:8 40:12 43:21 51:6 56:25 57:2,4,17 67:4 67:13 92:18 103:5,9,12	quote 37:25 quoted 10:4	regional 21:10 15:7	represents 4:21	Re-proof 14:5 15:1	Sally 93:21 94:17	senior 12:8 13:8 18:1 63:2
quickly 9:23 18:17	quote 37:25 quoted 10:4	register 28:19	reputation 97:2	Richard 22:12 35:20	sames 44:12	sense 35:4 45:10 45:11
quite 17:16 18:16 21:8 23:10 31:11	quote 37:25 quoted 10:4	Registrar's 12:24	request 21:16,20 46:10 48:17 50:21	Richard's 29:22	sample 26:5,20	sent 22:22 27:2
	quote 37:25 quoted 10:4	registration 15:24 18:8 20:15 27:24 48:16	requests 27:18 50:24 51:2,3 51:18,21 52:18 53:2,3,7 54:3	right 3:6,9 6:16 9:6,14,15,25 11:4 12:9 15:2 17:9 18:18 23:8 24:15 27:15,17 28:16 30:5 31:10 33:3,18 36:18 37:19 38:22 40:4 41:15 42:8 44:18,23 48:14 50:6 52:2,14 53:5 59:7,25 61:1 63:17 64:16 65:5 66:14 67:17,21 68:23 69:4,15 77:11 82:24 84:6 86:22 88:19 94:11 96:12 99:2 100:3,5 102:4,10	Samuels 33:22	sentence 3:25 81:17,24 82:13 87:19
	quote 37:25 quoted 10:4	regard 9:3 82:22 97:21	required 24:10 27:23 43:18 56:15	revealing 89:2 91:20	sand 63:7	September 13:8 14:3 34:21 62:11 70:10 84:11
	quote 37:25 quoted 10:4	regarding 78:10 84:25	requirement 100:8	revelations 24:12	sat 24:25 68:17	
	quote 37:25 quoted 10:4	regards 10:2 20:24 99:15	research 14:18 16:20 17:6 89:24 90:3 91:13,13	re-visit 54:17	satisfied 84:24	
	quote 37:25 quoted 10:4	regional 21:10 15:7	release 48:8,20	re-examine 50:2 15:1	Saturday 72:1,6 72:13	
	quote 37:25 quoted 10:4	register 28:19		Re-proof 14:5 15:1	save 92:7	
	quote 37:25 quoted 10:4	Registrar's 12:24		Rhodri 64:1	savings 73:15	
	quote 37:25 quoted 10:4	registration 15:24 18:8 20:15 27:24 48:16		Richard 22:12 35:20	saw 15:23 36:21 38:11 41:22 44:25 68:25 96:23	
	quote 37:25 quoted 10:4	regard 9:3 82:22 97:21		Richard's 29:22	saying 1:9 4:21 6:16,16,17 36:21 37:20 39:23 43:4,24 46:23 49:18 57:9 76:22 82:4,8,9 86:2,3 93:23 94:9 95:24 100:4	
	quote 37:25 quoted 10:4	regarding 78:10 84:25		right 3:6,9 6:16 9:6,14,15,25 11:4 12:9 15:2 17:9 18:18 23:8 24:15 27:15,17 28:16 30:5 31:10 33:3,18 36:18 37:19 38:22 40:4 41:15 42:8 44:18,23 48:14 50:6 52:2,14 53:5 59:7,25 61:1 63:17 64:16 65:5 66:14 67:17,21 68:23 69:4,15 77:11 82:24 84:6 86:22 88:19 94:11 96:12 99:2 100:3,5 102:4,10	sat 24:25 68:17	
	quote 37:25 quoted 10:4	regards 10:2 20:24 99:15		re-examine 50:2 15:1	Saturdays 72:1,6 72:13	
	quote 37:25 quoted 10:4	regional 21:10 15:7		revelations 24:12	save 92:7	
	quote 37:25 quoted 10:4	register 28:19		re-visit 54:17	savings 73:15	
	quote 37:25 quoted 10:4	Registrar's 12:24		re-examine 50:2 15:1	saw 15:23 36:21 38:11 41:22 44:25 68:25 96:23	
	quote 37:25 quoted 10:4	registration 15:24 18:8 20:15 27:24 48:16		Richard 22:12 35:20	saying 1:9 4:21 6:16,16,17 36:21 37:20 39:23 43:4,24 46:23 49:18 57:9 76:22 82:4,8,9 86:2,3 93:23 94:9 95:24 100:4	
	quote 37:25 quoted 10:4	regard 9:3 82:22 97:21		right 3:6,9 6:16 9:6,14,15,25 11:4 12:9 15:2 17:9 18:18 23:8 24:15 27:15,17 28:16 30:5 31:10 33:3,18 36:18 37:19 38:22 40:4 41:15 42:8 44:18,23 48:14 50:6 52:2,14 53:5 59:7,25 61:1 63:17 64:16 65:5 66:14 67:17,21 68:23 69:4,15 77:11 82:24 84:6 86:22 88:19 94:11 96:12 99:2 100:3,5 102:4,10	sat 24:25 68:17	
	quote 37:25 quoted 10:4	regarding 78:10 84:25		re-examine 50:2 15:1	Saturdays 72:1,6 72:13	
	quote 37:25 quoted 10:4	regional 21:10 15:7		revelations 24:12	save 92:7	
	quote 37:25 quoted 10:4	register 28:19		re-visit 54:17	savings 73:15	
	quote 37:25 quoted 10:4	Registrar's 12:24		re-examine 50:2 15:1	saw 15:23 36:21 38:11 41:22 44:25 68:25 96:23	
	quote 37:25 quoted 10:4	registration 15:24 18:8 20:15 27:24 48:16		Richard 22:12 35:20	saying 1:9 4:21 6:16,16,17 36:21 37:20 39:23 43:4,24 46:23 49:18 57:9 76:22 82:4,8,9 86:2,3 93:23 94:9 95:24 100:4	
	quote 37:25 quoted 10:4	regard 9:3 82:22 97:21		right 3:6,9 6:16 9:6,14,15,25 11:4 12:9 15:2 17:9 18:18 23:8 24:15 27:15,17 28:16 30:5 31:10 33:3,18 36:18 37:19 38:22 40:4 41:15 42:8 44:18,23 48:14 50:6 52:2,14 53:5 59:7,25 61:1 63:17 64:16 65:5 66:14 67:17,21 68:23 69:4,15 77:11 82:24 84:6 86:22 88:19 94:11 96:12 99:2 100:3,5 102:4,10	sat 24:25 68:17	
	quote 37:25 quoted 10:4	regarding 78:10 84:25		re-examine 50:2 15:1	Saturdays 72:1,6 72:13	
	quote 37:25 quoted 10:4	regional 21:10 15:7		revelations 24:12	save 92:7	
	quote 37:25 quoted 10:4	register 28:19		re-visit 54:17	savings 73:15	
	quote 37:25 quoted 10:4	Registrar's 12:24		re-examine 50:2 15:1	saw 15:23 36:21 38:11 41:22 44:25 68:25 96:23	
	quote 37:25 quoted 10:4	registration 15:24 18:8 20:15 27:24 48:16		Richard 22:12 35:20	saying 1:9 4:21 6:16,16,17 36:21 37:20 39:23 43:4,24 46:23 49:18 57:9 76:22 82:4,8,9 86:2,3 93:23 94:9 95:24 100:4	
	quote 37:25 quoted 10:4	regard 9:3 82:22 97:21		right 3:6,9 6:16 9:6,14,15,25 11:4 12:9 15:2 17:9 18:18 23:8 24:15 27:15,17 28:16 30:5 31:10 33:3,18 36:18 37:19 38:22 40:4 41:15 42:8 44:18,23 48:14 50:6 52:2,14 53:5 59:7,25 61:1 63:17 64:16 65:5 66:14 67:17,21 68:23 69:4,15 77:11 82:24 84:6 86:22 88:19 94:11 96:12 99:2 100:3,5 102:4,10	sat 24:25 68:17	
	quote 37:25 quoted 10:4	regarding 78:10 84:25		re-examine 50:2 15:1	Saturdays 72:1,6 72:13	
	quote 37:25 quoted 10:4	regional 21:10 15:7		revelations 24:12	save 92:7	
	quote 37:25 quoted 10:4	register 28:19		re-visit 54:17	savings 73:15	
	quote 37:25 quoted 10:4	Registrar's 12:24		re-examine 50:2 15:1	saw 15:23 36:21 38:11 41:22 44:25 68:25 96:23	
	quote 37:25 quoted 10:4	registration 15:24 18:8 20:15 27:24 48:16		Richard 22:12 35:20	saying 1:9 4:21 6:16,16,17 36:21 37:20 39:23 43:4,24 46:23 49:18 57:9 76:22 82:4,8,9 86:2,3 93:23 94:9 95:24 100:4	
	quote 37:25 quoted 10:4	regard 9:3 82:22 97:21		right 3:6,9 6:16 9:6,14,15,25 11:4 12:9 15:2 17:9 18:18 23:8 24:15 27:15,17 28:16 30:5 31:10 33:3,18 36:18 37:19 38:22 40:4 41:15 42:8 44:18,23 48:14 50:6 52:2,14 53:5 59:7,25 61:1 63:17 64:16 65:5 66:14 67:17,21 68:23 69:4,15 77:11 82:24 84:6 86:22 88:19 94:11 96:12 99:2 100:3,5 102:4,10	sat 24:25 68:17	
	quote 37:25 quoted 10:4	regarding 78:10 84:25		re-examine 50:2 15:1	Saturdays 72:1,6 72:13	
	quote 37:25 quoted 10:4	regional 21:10 15:7		revelations 		

sequence 53:4	simply 81:8 97:9	71:3	25:11,25 40:19	78:1	77:7,14,19	70:20 72:21,22
serious 7:2	single 43:5	south 14:19,21	40:20	sum 92:8,11	79:4 84:12,15	territory 10:17
seriously 54:16	SIO 62:4	15:9 31:17	sticking 75:12	summarise 95:3	86:21 87:16	80:20,22 86:18
seriousness 38:4	sir 1:3 2:2,7 3:12	spare 66:20	stone 25:16	100:3	92:24 93:14	text 76:4
served 59:11	7:4,16,25 9:5,7	speak 29:12	stood 97:10	summary 75:13	99:11	thank 1:11 2:10
60:23	10:18 11:3,5	35:11 44:1	stop 79:17,18,18	87:18	taken 22:19 35:5	9:5 11:4,6,15
service 61:14	11:19 12:6	57:14	80:19 82:2,2,2	summonsed 99:5	36:1,3 66:22	12:18,21 13:7
servicing 14:11	16:25 28:1	SPEAKER 2:9	82:9,10,16	sums 92:16	67:16 69:1,2	14:17 15:9,18
set 26:17 29:3	44:22 56:11,20	speaking 86:5	97:11,16 98:15	Sunday 4:24	73:17 94:9,21	17:16 21:19
45:4 46:9,17	56:24 63:23	specialist 73:17	stopped 45:15	50:20,22 53:1	takes 19:20	24:4 28:16
46:18 54:11	64:5 87:8 97:9	75:10	stopping 92:1	53:6,23,25	56:23 95:5	29:9 37:12
55:5 70:15	98:21 100:2,19	specific 28:9	story 3:11 4:2,4	54:7,19,21	talk 91:23 93:20	40:5 41:8
71:7 101:21	sit 11:9	specifically	4:6 17:4 34:20	72:14	talked 85:22	44:19 49:25
setting 2:13	six 41:24 53:2	26:24 44:3	35:12 41:15	supervise 60:21	talking 18:3	62:6 63:17,18
settle 91:21	59:11 62:16	53:18	42:17,18 70:24	supervision	30:19 34:6	65:10 66:14,21
settled 60:6	sixth 21:6	speculation 4:17	71:3,4,18	60:25	40:15 48:10	76:1,19 77:4
90:24	size 21:7	4:19 6:4	87:20 89:14,15	supplementary	57:6 62:10	97:14,15,24
settlement 60:5	skim-read 99:13	spent 22:19 96:3	89:23 90:3,4	4:22 12:3	talks 72:24,25	98:18,19
70:21 71:21	skip 78:12	spider 32:13	straight 6:24	55:18	tampering 63:13	100:18 102:10
80:8 90:14,17	sleep 52:20	spoke 6:9 30:8	13:24	supplied 38:9	86:17	102:11
91:22	slightly 17:4 47:9	30:18	strand 2:20 7:7	support 5:20	tap 50:23	thankfully 94:13
seven 13:9 53:7	77:3 97:6	spoken 58:24	strands 2:16	41:20 80:24	tape 6:13 69:1	thanks 24:19
59:9 98:25	small 39:21	59:3,12 83:21	strategy 88:18	100:13	taskings 46:14	25:3
101:3,20,20,21	smears 5:10 7:13	squarely 74:3	88:24 90:10	supported 2:18	51:14	they'd 30:24
101:25	Smith 45:1 50:3	SRA 78:23 85:5	strength 10:25	suppose 5:15	taught 49:7,7	38:16 42:3
share 6:4,5 41:12	55:19	staff 26:1	41:25	29:24 56:22	Taylor 41:15	45:25 62:22,23
shared 18:6	smooth 7:9,10	stage 22:8 25:5,5	stress 7:10,12	supported 60:21	70:21 71:21	79:14,14,19,20
Sheffield 93:6	soap 97:9	29:2 30:4	58:6	80:3	72:19 77:18	85:18 93:6
Sherborne 1:25	sold 17:7	33:12 37:7	strict 70:20	sure 6:18 8:15	78:7,9,22 79:1	thing 38:14 41:1
2:7 3:23 5:12	solely 7:9	75:19 86:25	Stripes 73:12	9:8 28:17	79:24 80:1	44:2 68:11
9:6,7,12,13	solicitor 66:19	Staines 99:3,12	strong 45:17,21	35:10 53:23	81:11 82:23	69:19 72:21
10:1,9,18,22	69:10 86:7	stand 45:17 93:7	47:15 81:7	54:6 59:16	83:2,6,10,12	85:18 94:15
11:3 64:25	95:5	97:9,12	89:19	63:13 67:1	84:20 85:2	97:7
76:19,21	solicitors 59:16	Star 87:1,2	strongly 56:21	76:7 99:24	Taylor's 70:20	things 4:23 33:4
she'd 18:7	76:16 78:13	start 10:16 50:20	stupid 71:6	surrounding	78:13	44:20 68:10
shoot 30:1	80:1 85:4	70:2 75:25	74:13,18	13:25	team 24:21 27:3	78:2 85:19
short 12:2 34:21	86:14 88:5,11	86:22	subheading	surveillance 86:2	39:16 62:3	89:9 99:23
58:10 63:21	89:2 90:7	started 17:10	70:14	86:3 97:25	72:20	think 4:16,20 5:8
82:21	somebody 31:21	19:1 25:17	subject 3:14 32:9	98:1	teamed 25:25	5:22 8:23 9:8
shorter 53:24	41:20 61:4	39:21 50:12	submission 8:1	suspect 76:10	technician 70:8	11:16 12:23
shoulder 89:12	74:8 90:1	72:6 91:16	submissions 6:22	suspended 17:1	Tectrix 69:6	15:11,16 18:9
show 22:15,17	99:16	starting 82:12	10:6 99:6	suspicion 72:9	74:23 85:23	18:12 21:7
36:13 37:9	somebody's	statement 4:12	submitted 32:25	84:18	97:22	22:7 30:11,15
53:1 94:21	28:12	4:22 11:22,25	subsequently	Swansea 16:6,9	Telegraph 95:18	32:3 34:21
showed 23:11	soon 71:22	12:3 14:2 17:3	17:7 19:3 20:8	31:9	telephone 16:6	39:6 41:19
67:20	sorry 12:20	21:6 26:17	24:10 34:8	swimming 91:11	17:25 20:16,17	42:23 46:13,15
shown 67:15,24	18:11 34:9	35:16 37:14	67:22	swings 95:25	21:19,20 27:24	46:22 47:15,23
68:5,20 69:5,8	48:12 56:8	45:1,5 51:19	substantial	sworn 11:7 103:8	27:25 28:24	48:14 49:24
76:8	60:2 66:25	53:9 55:18	96:18	system 39:3	40:15 57:13	51:10 52:5
shows 53:2,6	87:8 88:16	61:3 64:3 65:1	succeeded 69:19	93:20 95:25	61:4,8	53:16 55:9
68:1	sort 8:16 10:16	67:6,7,11,12	suddenly 59:4	96:7,8	telephoned	56:11,13 57:17
sick 34:15 58:5,6	18:2 22:21	84:8 98:5,9	sue 77:24,24,25		71:20	58:13 60:7,24
59:13,15,19	23:10 24:9,18	100:4	78:1 83:14,15	T	tell 12:7 22:11	61:2,25 62:5
side 32:11,12	24:25 41:1,20	statements 11:12	sued 93:4,5	tab 11:22 54:14	27:6 28:6 29:4	64:10,17 65:9
70:16 94:2,13	44:2 47:11,18	11:21 74:13	Suffice 77:14	table 50:19 51:11	40:5 42:4 50:1	65:11 66:17
96:6	48:6 51:2 63:1	100:22	sufficient 100:15	51:16 53:5	57:25 58:3,4	67:18 72:1,8
Sienna 95:1	74:11 86:4	station 67:14	sufficiently 85:2	54:3,5,18	58:22 67:13	75:4 76:12
sift 25:6	89:14 93:15	68:21	suggest 7:5 9:19	tables 50:14	68:1,24,25	77:5 82:15
signed 11:23,25	94:15 101:15	status 90:2	77:21 79:22	tabulated 42:11	90:18 95:3	83:6,24 84:7
12:4	sorts 92:16 93:13	statutory 32:7	87:3 95:12	tactic 73:22	96:3	85:8,13 88:10
significance	sought 20:13	stayed 12:15	suggested 89:9	Tactically 81:9	tells 4:4	88:13 92:2,4,5
17:24	69:18	59:19	suggesting 4:2	take 15:16 17:3	tempted 87:1	92:15 93:2
significantly 5:9	source 4:25	stemmed 84:17	7:6 78:1 87:8	17:16 24:17	ten 61:24	95:2,17 97:6
similar 23:19	16:21 17:17,20	Stephen 100:24	90:6	35:21 45:13	term 45:22	98:10 99:5,7
simple 36:11	31:20,24 37:19	stepped 31:21	suggestion 8:16	53:3 54:1	terms 20:11 29:3	99:17 100:3
58:7,21,23	64:20 70:18,24	steps 45:13 73:17	99:10	65:24 67:12	30:21 41:13	101:5,8
simplistic 50:14	sources 17:12	Steve 15:8 18:18	suggests 75:6	73:8,23 75:11	52:6 58:1,10	thinking 4:5 25:1

25:2,2 53:13 55:7 101:12 third 78:5,7 79:13 82:20 Thomas 1:4 20:8 22:12 24:4,11 24:18,23 35:20 36:4 37:10 49:18 53:22 55:3 101:18 Thomson 75:21 88:6,21 thorough 31:23 thought 4:14 8:25 24:19 41:22 47:7 50:3 55:4 73:25 86:14 88:13 thousand 28:22 thousands 40:15 40:15 threatened 77:24 three 11:11,21 30:19 36:15 38:15 59:10 79:10 87:23 88:5,9,11 three-day 98:21 102:8 throw 39:11 95:16 thrust 55:10 Thursday 72:2,3 72:4,5 101:2 time 3:13 5:13 6:18 13:7 19:17,22 20:2 25:11 30:18,19 34:2,13 35:7 40:12 41:9,19 42:1 49:14 54:2 67:23 71:18 72:16 74:6 79:15 89:18 90:21 93:1 94:3 95:23 96:3 times 16:16,17 45:25 46:3 53:1,6,23,25 54:7,21 timetable 100:19 103:6 tipped 38:10 titles 42:9,11,20 today 4:21,23 63:14,23 told 19:5 22:13 33:8 34:12 37:13 41:12 49:8 65:22 67:15,18 69:24 71:24,25 78:20 78:21 79:12 80:7 86:8 Tom 69:24 71:1	73:24 75:3 85:25 86:15 tomorrow 62:12 99:6 100:6,9 top 50:16 62:13 70:13 71:8 75:25 76:3 82:12 83:3 88:17 total 50:17 51:14 92:8 94:7 totemic 10:8 touch 30:17 31:6 47:6 touched 75:1 tracers 23:6 trail 24:9 26:11 transcript 10:3 transferred 77:1 travelled 72:5 treated 51:22,23 60:10 Treverton-Jones 79:11 trials 4:12 tribulations 4:13 tribunal 34:22 34:22 58:15,19 tried 55:25 56:3 87:14 trip 62:23 true 45:10 51:12 54:20 57:12 65:2 67:9,11 89:16 truly 68:6 trump 1:9 trumped-up 60:16 trusted 81:8 trustworthy 74:1 truth 11:25 89:22 try 73:20 82:24 83:2 89:1 trying 22:7 41:19 58:8 59:17 61:5,11 79:17 79:17,18 82:5 90:3 95:4 Tuesday 10:19 Tuesday's 100:23 tumour 91:13,15 turn 75:22 80:11 86:15 99:11 turned 18:3 71:22 two 2:16 11:12 11:21 13:13,16 13:17 23:12 25:16 26:3 35:4,15 42:7 46:2 51:6 53:14 55:10 62:5,18 79:13 80:21 85:23	92:25 twofold 42:5 two-year 13:2 type 48:1 50:22 types 49:4 typical 63:6 <hr/> U <hr/> unable 56:2 uncontroversi... 47:12 uncovered 88:1 undercover 19:4 underfoot 13:3 underlying underneath 76:4 80:14 underplay 38:4 understand 7:4 7:21 8:5,15 10:8,9,10,18 10:21,24 11:3 25:5 28:23 47:7 52:14 56:25 67:1,2 76:6 80:7 82:7 82:11 91:2 93:10 98:13,18 understanding 24:23 33:10 51:11,24 81:21 understood 10:11 26:12 99:9 undertaken 77:6 undertook 27:16 50:11 unfortunately 63:14 uniformed 20:4 union 80:2,9 unit 30:6 United 13:11 unlawful 28:7 36:8 unqualified 55:6 unreliable 60:10 untrustworthy 73:14,25 74:4 update 22:10,15 updating 25:4 upheld 59:24 uplift 93:15 95:19 upshot 14:22 16:12 32:21 use 7:7 20:6 26:24 45:12 60:14 76:16 81:25 82:5 96:9 uses 95:18 <hr/> V <hr/> v 99:18 valuable 11:17	value 85:10 various 12:16 46:9 86:12 vehicle 15:24 18:7,23 20:15 27:24 48:9 50:25 vehicles 16:1 18:22 31:19,23 verbatim 37:25 victim 23:2 25:17 26:16 35:12 victimised 58:8 victims 26:21 40:17 41:23 42:2,3 video 67:15,19 67:20,21,24,25 68:1,5,16 98:1 videoed 68:7 view 73:13 78:14 vilifying 7:25 virgin 80:20,22 virtually 39:4 voice 14:15 vote 89:20 voter/non-voter 89:19 VRMs 17:6 <hr/> W <hr/> wait 38:20 waived 37:9 79:15 waiver 65:15 66:7 79:8,9 walked 34:15 walking 15:21 want 5:20 9:10 10:7 34:23 40:14 43:17 57:1,14 58:4 58:22 61:14 65:6 66:5 78:9 80:12 82:9 91:1 92:14 96:16 wanted 1:14 14:23 17:14 26:9,22 29:24 39:7,20 41:18 42:15,16,18 43:11 54:13 59:18 64:5,6 83:14 86:19 91:3,7,9 wanting 80:19 Wapping 68:18 warrant 14:23 15:6 19:24 62:21 wasn't 4:25 6:17 9:1 10:19 12:12 29:21 34:14,16 36:14 36:21 40:21	41:1,16 49:14 59:17 70:11 71:15 87:8 92:8,10 waste 95:22 wasting 85:20 watching 68:16 way 8:8,13 10:15 21:18 23:8 28:11,14 40:9 46:16 49:5,21 50:14 51:20 53:16 57:13,18 60:11,14,19 61:12 72:9 78:5 85:12 91:4 92:20 95:1 96:25 97:3 101:14,20 ways 72:23 weak 45:21 web 32:13 Webb 67:16,22 website 90:21 93:7 Wednesday 93:6 100:25 week 1:5 9:4 64:13 71:24 72:23 75:21 78:20 98:21,23 98:24 100:19 100:20 101:19 101:21,21 102:2,3,6,7,8,9 weekend 44:25 weeks 29:10 59:11 62:16 101:21 weird 4:14 went 17:19 18:12 18:13 19:11 22:19 23:5 34:15,17,22 59:13 61:16 68:21 71:10 72:14,14,21 73:2 89:12,13 90:1,21 weren't 15:22 26:24 43:13,15 51:1 69:6 72:11 we'll 36:3 38:22 39:18 58:11 63:19 67:12 81:4 101:2 we're 1:4 6:5 7:19 12:22 20:3 22:9 36:23 38:25 39:1 49:24 57:6 70:1 77:12 97:6 100:6 101:18 101:19 we've 3:4 8:12	32:3 33:19 74:22 84:16 whatsoever 35:14 85:10,13 whichever 28:15 whilst 81:14 white 75:6 Whittamore 18:18 19:7,15 20:22 22:2,25 23:6,13,25 27:16 31:18 32:18,19 33:6 33:13,24 36:9 36:14 40:20 44:7,14 46:1 50:21,25 Whittamore's 19:17 40:19 51:14 whoever's 89:23 wide 83:20,23 widely 26:18 wider 68:13 widespread 7:3 wife 78:11 80:7 Wilf 17:25 25:10 willing 57:25 willingness 83:12 Wilmshurst 92:24 Wimbledon 18:13,14 win 95:10,10,14 96:5,23 Winslow 12:9 13:13 22:9 wish 44:22 77:25 wished 95:15 wishes 99:6 100:10 witness 7:1 11:5 11:12,21 53:9 57:20 63:23 65:1 67:6,12 84:7 86:12 witnesses 100:20 100:23 woman 3:1 6:9 wonder 27:21 wonderful 81:2 word 5:12,13,13 9:2 39:3 45:12 59:3 64:2 words 5:17 7:12 39:7 62:24 101:9 work 18:2 21:13 60:17,20 62:25 74:18 93:10 96:20 101:4 worked 53:12 72:18,20 working 23:24 25:21 29:6,8 50:5	World 42:10 50:20,22 54:20 54:25 73:24 88:18,23,25 94:4,9 98:3 worse 68:9 wouldn't 5:17 20:24 21:2 27:4 41:24 49:10 76:22 79:3 91:23 97:4 100:2 write 42:17 written 3:11 18:23 84:1 wrong 6:16 9:2 9:18 52:21 55:12 71:16,17 79:4 89:10 90:4,9,11 91:4 wrongdoing 20:24 21:2 wrongly 74:11 wrote 8:7 88:10 <hr/> X <hr/> X 21:21 76:16 103:1 <hr/> Y <hr/> yeah 48:12 year 50:12 59:23 67:14 89:25 93:2,15 years 12:7,15 38:15 45:18 49:11,11 59:9 60:23 61:13 92:25 yellow 21:10 yesterday 44:8 44:16 87:15 young 18:4 91:14 youngest 69:2 <hr/> 0 <hr/> 00487 54:15 <hr/> 1 <hr/> 1 11:22 70:13 86:23 103:3 1,900 47:14 1,900-odd 46:15 1.5 91:17,18 10 16:9 17:7 75:8 80:11 81:14 102:13 100 53:3 11 15:4 31:17 32:1 115 103:6 118 103:7 12 15:4 16:9 31:17 34:19 75:18 82:12 102:2,8
---	---	---	--	---	---	---

128 103:8,9	3.46 63:22				
13 75:14 76:2	3.5 17:3				
83:3	3.8 17:22				
13,343 46:13	30 12:15 26:5				
47:13 52:7	45:18 60:23				
13,500 52:19	61:13				
14 62:11 68:2	30,000 96:24				
69:3	300 46:3				
15 51:8 70:6	34 54:14				
16 73:7	390 92:21				
17 11:23 12:14					
17,000 26:18,21	<u>4</u>				
27:15,18 50:17	4 2:9 42:4 67:14				
17,500 21:11	4-year-old 63:5				
50:18 52:3,8	4.10 31:6				
52:19	4.12 32:2				
18 62:15 75:18	4.16 33:5				
83:16 84:10	4.18 35:16				
184 103:10,12	4.2 20:13				
19 12:14 84:13	4.47 102:12				
102:7	4.8 26:3 27:6				
1984 13:5	4.9 29:9				
1995 12:17	400 46:3				
1997 13:1					
1998 13:4	<u>5</u>				
1999 12:7 13:8,9	5 37:14 42:4				
	70:10 74:20				
<u>2</u>	84:13 88:15,17				
2 71:8,9	102:14 103:4,5				
2.00 1:2	5,000 47:16,17				
20 11:23	5.13 52:25				
20,000 97:4	5.18 54:12 55:11				
200 46:3	5.2 40:5				
2000 13:4	5.6 44:25				
2002 14:3 15:5	5.8 50:1				
2003 19:20 22:10	5.9 50:8				
2004 33:1	50 39:17,17				
2005 12:7 30:12	50,000 97:1				
33:5,22 58:2	52 53:7				
2006 34:21 40:7	55 38:4 48:22				
53:6	59 55:22 61:12				
2009 41:9 71:10					
71:14,15	<u>6</u>				
2010 69:2 70:8	6,000 42:4 47:14				
73:11 74:20	47:17				
76:2 84:15	6.8 37:21				
2011 70:10 84:11	60 42:3				
84:15 85:9	60s 61:13				
102:14					
21 2:6 5:22 99:4	<u>7</u>				
100:4	7 75:23 84:11				
214 103:13	7th 100:25				
22 12:5	70 42:3 93:1				
24 50:24 51:2	700 19:14				
25 26:5 60:23					
25,000 93:2	<u>8</u>				
96:23	8 19:20 40:7 73:9				
26 73:11	78:4				
27 5:22 37:21	80 93:1				
<u>3</u>	<u>9</u>				
3 64:10 73:2	9 1:5 71:10,14,15				
3,500 50:17	72:2				
3,700 50:17	9th 72:8,8				
3,757 51:7,13	97 73:5				
3.1 14:2					
3.39 63:20					