

<p>1 2 (2.00 pm) 3 LORD JUSTICE LEVESON: Yes, Mr Jay. 4 MR JAY: The next witness is Mr Peter Burden, please. 5 MR PETER HENRY BURDEN (sworn) 6 Questions from MR JAY 7 MR JAY: Mr Burden, please sit down and make yourself 8 comfortable. 9 A. Thank you. 10 Q. Your full name, please? 11 A. Peter Henry Burden. 12 Q. Mr Burden, you've provided a witness statement to the 13 Inquiry dated 13 October 2011. It runs to four pages. 14 The version I have isn't signed, but is this your formal 15 evidence to the Inquiry with one redaction I think we've 16 made? 17 A. Yes. 18 Q. You tell us a little bit about yourself. You say that 19 since 1987 you've been a freelance author. You've also 20 produced several non-fiction titles, two of which are 21 books: Fake Sheiks &amp; Royal Trappings, and there's 22 another book you've written more recently, How I Changed 23 Fleet Street; is that correct? 24 A. No, that isn't correct. That is another Peter Burden. 25 He used to be the chief crime reporter on the Daily Mail</p> <p style="text-align: center;">Page 1</p>	<p>1 Q. I'm not going to ask you specifically about what he told 2 you, although it's clear from the third page of your 3 statement the limit of your contact with him. Can I ask 4 you then about your direct knowledge of other matters? 5 First of all, in your book you refer to the Bob and Sue 6 Firth story. Have you spoken to anyone directly about 7 that? 8 A. Yes, I did go down and see Mr and Mrs Firth in early 9 2009, and discussed the whole case with them because I'd 10 only touched on it lightly in the first edition, and 11 indeed I had unfortunately placed them in Essex whereas 12 in fact they were in Dorset. So I had to put this right 13 and I went to see them and they told me in considerable 14 detail the background to the events which subsequently 15 came out where they were exposed, as it were, in the 16 News of the World for running a bed and breakfast 17 establishment that was of a naturist nature. A strange 18 place to do it, in the middle of Dorset, but that's 19 where they were doing it, and the News of the World had 20 gathered that there were additional facilities or 21 services, I should say, on offer there, and they sent 22 down their reporter, Mr Neville Thurlbeck, to see what 23 was going on. 24 Q. May I ask you this question: have you spoken to 25 Mr Thurlbeck to obtain his account of events?</p> <p style="text-align: center;">Page 3</p>
<p>1 and he retired quite a long time ago. 2 Q. I was struggling a little bit with the photograph. It 3 didn't bear much resemblance. 4 A. That isn't my book. 5 Q. My sincere apologies for that. I'll say nothing more 6 about it. Can I ask you please about Fake Sheiks &amp; 7 Royal Trappings, which we've read and I referred to when 8 opening this case. To be clear, in relation to the 9 phone hacking issue, if I can describe it in those 10 terms, can we be precise as to the direct contacts, if 11 any, you've had with people. Have you spoken to any 12 News of the World or other journalists about phone 13 hacking, first of all? 14 A. I've tried to, but without any direct result. I've 15 spoken to quite a lot of News of the World journalists 16 off the record, and some on the record, but none of them 17 that I spoke to was prepared to make any firm statement 18 one way or the other. 19 Q. Right. 20 A. And one or two denied it flatly. 21 Q. Right. You also make it clear in your statement -- and 22 I'm going to ask you to be careful of the answer you 23 give. You've had limited contact with 24 Mr Glenn Mulcaire; is that correct? 25 A. That's correct, yes.</p> <p style="text-align: center;">Page 2</p>	<p>1 A. No, he was disinclined to talk to me when I asked him. 2 Q. Are you aware of a Channel 4 programme which deals with 3 these matters or not? 4 A. As a matter of fact, I'm not, no. I don't know what it 5 covered and it was never drawn to my attention, so I'm 6 afraid I don't know what conclusions it came to. When 7 was that put out? 8 Q. We're investigating when, Mr Burden. I just wanted to 9 ascertain the sources of your information. You've 10 kindly told us that you spoke to the Firths but you 11 didn't speak to Mr Thurlbeck, although I think the sense 12 of your evidence is that you tried to; is that right? 13 A. Yes, I tried to talk to all these people, but none of 14 them would return my calls, or simply put the phone 15 down. 16 Q. In relation to what you say about Mr Mazher Mahmood -- 17 and I think there are two chapters of your book which 18 deal with him -- aside from reading all the publicly 19 available material, did you speak to anyone about those 20 issues? 21 A. Well, I spoke extensively to his brother, Waseem 22 Mahmood, who is a broadcaster -- a well-respected 23 broadcaster -- who set up radio stations and television 24 stations overseas in Afghanistan and places, and he is 25 not on good terms with his brother and was able to give</p> <p style="text-align: center;">Page 4</p>

<p>1 me quite a lot of background to Mazher Mahmood's early 2 background and his early life.</p> <p>3 Q. Okay. May I ask you -- and this is on the third page of 4 your witness statement. You say at the bottom of the 5 page that while preparing a second edition of your book, 6 you were approached by two former News of the World 7 photographers, Mr Steve Grayson and Mr Ian Cutler, who 8 provided graphic examples of stunting, which is faking 9 photographs, and, in Mr Cutler's case, of simply 10 inventing and casting stories for the paper in 11 conjunction with journalists. Is that information they 12 freely gave to you?</p> <p>13 A. Yes, yes, and indeed Steve Grayson has outlined some of 14 this in a book of his own, which is listed at the back 15 of my book, which you can find, which he had published 16 a couple of years ago, and it's called -- Don't Ask, 17 Don't Get, it's called, by Steve Grayson. He has 18 outlined a lot of that, but I also had several meetings 19 with him in which he gave me further detail.</p> <p>20 Q. Can we have a sense of the dates we're talking about 21 here when Mr Grayson and Mr Cutler were operating, as it 22 were? We're talking about some time ago, are we not?</p> <p>23 A. Yes, we are. Ian Cutler was operating in the 1970s and 24 1980s with a well-known journalist at the time called 25 Trevor Canson(?), and they certainly, according to him, Page 5</p>	<p>1 a genuine shot", and as a result of that, they took 2 proceedings against him, all of which are detailed in 3 his own book and a matter of public record.</p> <p>4 Q. Yes, and referred to in your book.</p> <p>5 A. Yes.</p> <p>6 Q. It might be said that this is all of somewhat historical 7 interest. If the last date is 1999 --</p> <p>8 A. Mm.</p> <p>9 Q. -- what bearing does that have on the culture, practices 10 and ethics of the press now? What do you say about 11 that?</p> <p>12 A. The reason I included it was simply because I think it 13 showed the development of that culture -- and first of 14 all the culture of not having outstanding regarding for 15 the truth -- as being something that was fairly long 16 term within that particular newspaper and the idea of 17 simply getting the story by any means, whether it was by 18 stunting photos or entrapping people, was embedded in 19 the culture, the ethos of the newspaper by then, which 20 would seem to set the right sort of background for 21 people to be prepared to take subsequent risks on things 22 like phone hacking, which is what my book was -- what 23 originally sparked my book, was the jailing of the two 24 phone hackers.</p> <p>25 Q. Thank you. May I ask you some specific matters arising Page 7</p>
<p>1 would go out and find circumstances that they thought 2 might make a good headline, like dole cheats or rent 3 boys at the YMCA and so on, and they'd just get a chum 4 and photograph him outside the YMCA and make the story 5 up, and as long as, you know, it was sufficiently 6 interesting and titillating to the readers -- or they 7 thought it was -- it went in, according to Ian Cutler, 8 who's also written a book, if you could call it that, 9 which is called The Camera Assassin, in which he 10 recounts many of these events. How truthful all the 11 accounts are I wouldn't like to say, but I'm sure some 12 of them are.</p> <p>13 Q. And Mr Grayson? What period of time are we --</p> <p>14 A. He was operating in 1990s, I think up until about the 15 end of 1999, I think, that he eventually was dismissed 16 and he did go to a tribunal and lost, actually. He was 17 dismissed, he claims, for, he felt, obeying orders, 18 producing a picture of the Beast of Bodmin when there 19 wasn't a beast and he simply took a picture of a puma in 20 Ilfracombe zoo and took the bars out of the shot and 21 submitted it, and the News of the World, then edited by 22 Rebekah Wade, I think -- or she might have been deputy 23 at the time; she was deputy at the time, but on her 24 own -- was very keen to have it, and then of course he 25 had to own up. He had to say, "Look, of course it's not Page 6</p>	<p>1 out of your book, if you don't mind? We have copied 2 parts of it, but you and I are going to work from the 3 second edition, which I think was published in 2008 or 4 2009?</p> <p>5 A. 2009. 2009, yes. May 2009.</p> <p>6 Q. First of all, the quote at the front you haven't 7 attributed. It's not necessary to do so now, but you 8 name the former news editor in the book somewhere, don't 9 you?</p> <p>10 A. Yes.</p> <p>11 Q. Can I ask you first of all, please, about page 82. You 12 say, four lines down:</p> <p>13 "To the News of the World, anyone is fair game, 14 irrespective of the hugely disproportionate damage its 15 victim might suffer when set against what is often an 16 entirely legal and completely private act where no one 17 else is being harmed."</p> <p>18 Are you looking there at a particular point in time 19 or are you looking more generally?</p> <p>20 A. I'm looking for -- no, I'm looking at it generally, that 21 the notion that running a story that was going to do 22 considerable harm to somebody, even though no illegality 23 had been involved, was irrelevant to them. They didn't 24 care how much harm they did. In fact, in many respects, 25 the more harm they did, the better because that made the Page 8</p>

<p>1 story bigger. I think that's the point I was trying to 2 make there.</p> <p>3 Q. Then you give some specific examples. There's the 4 Arnold Lewis story, which ended in tragedy. That was in 5 1978?</p> <p>6 A. Yes.</p> <p>7 Q. Then there's as Mazher Mahmood early sting, which you 8 deal with at pages 83 and following. This is a little 9 guest house in The Paddock LA(?), I think.</p> <p>10 A. Yes.</p> <p>11 Q. It's probably not necessary to go into the detail of 12 that.</p> <p>13 Mr Cutler and his photographs, that starts at 14 page 92. You've told us something about the faking of 15 photographs. Much of it is in the public domain. At 16 the bottom of page 103, you rightly draw attention to 17 the fact, as you've already told us, that the unfair 18 dismissal claim was rejected in the employment 19 tribunal --</p> <p>20 A. Yes.</p> <p>21 Q. -- in East London. Bob and Sue Firth is page 105. 22 Based in part on obviously the articles themselves and 23 in discussions you've had with them. Missing out the 24 sort of reverse sting at the end on Mr Thurlbeck, which 25 the Inquiry isn't so much interested in, what in</p> <p style="text-align: center;">Page 9</p>	<p>1 A. Quite. I think basically it was just embellished and 2 added to in a way to make the story a bit stronger than 3 it already was, which again has turned out to be, as 4 I've found, fairly standard practice. You put in 5 anything extra that you think is going to make the thing 6 look ripe that you don't think is going to get you into 7 trouble.</p> <p>8 Certainly, there's -- one statement which said "Bob 9 hid in a cupboard while Sue romped with guests" was 10 complete nonsense. He didn't hide in a cupboard at all. 11 They told me it was a complete fiction by Thurlbeck and 12 most of what he said -- most of what he listed weren't 13 things that were going on at all. And, of course, at 14 the end he said that he declined the offer of any 15 further services, which turned out not, in fact, to be 16 the case.</p> <p>17 So according to the Firths -- and my inclination was 18 to believe them because my reading of them was that they 19 were quite happy to say that they were running a nudist 20 B&amp;B and that people would wander around in the nude, and 21 if they wanted to engage in sexual shenanigans with one 22 another, that was fun, but the idea that there were sort 23 of organised services being offered was Thurlbeck's 24 fabrication.</p> <p>25 Q. Okay.</p> <p style="text-align: center;">Page 11</p>
<p>1 a nutshell was that story about?</p> <p>2 A. That was simply a case of people at the paper, probably 3 Thurlbeck himself mostly, identifying that here was 4 a possibility to go down and write a piece about unusual 5 activities or comparatively unusual activities down in 6 the Dorset countryside, and presumably -- he didn't have 7 photographs -- he didn't have a photographer with him, 8 so presumably he was just going to come back and write 9 the story up and did come back and write the story up 10 with photographs of the house and explain what he'd been 11 offered when he got there and what he'd done, although 12 subsequently he didn't in fact tell the whole story, as 13 subsequent events showed.</p> <p>14 But it was a very run-of-the-mill smut story, as far 15 as they were concerned. It was something that would 16 probably end up on page 20 or 30, not a big story, but 17 another story of sexual misbehaviour in a slightly 18 unlikely spot, which is the kind of story they like very 19 much. They're very keen on sort of rural smut, for some 20 reason.</p> <p>21 Q. You point out at page 113 that there were various 22 inaccuracies in the story on top of that?</p> <p>23 A. Yes, there were, because -- yes.</p> <p>24 Q. And some of the detail we don't really need to know, but 25 I think --</p> <p style="text-align: center;">Page 10</p>	<p>1 May I deal with another matter, which is fully in 2 the public domain, page 122. This is the Rebecca Loos 3 story, which we all know about. Just two points on it, 4 though, Mr Burden. You say halfway down page 122: 5 "In 2005, the News of the World was given an award 6 for scoop of the year."</p> <p>7 And Mr Thurlbeck was, as it were, the recipient on 8 behalf of the newspaper, is that right, and it related 9 to this story?</p> <p>10 A. Yes, it was his story, yes.</p> <p>11 Q. Do we know what the sum was that Rebecca Loos was paid 12 by the News of the World?</p> <p>13 A. We don't precisely, no. Several sums have been bandied 14 around, but I've heard -- I'd heard 300,000 and I'd 15 heard 800,000, so I imagine it was somewhere in between, 16 but as is often the case with this sort of payments, 17 they tend to get blown up as the story progresses, 18 but -- certainly Max Clifford told me she got 19 a substantial sum for it but he didn't say what that sum 20 was.</p> <p>21 Q. You had conversations with Mr Clifford about this but he 22 was, as it were, loyal to the confidentiality of his 23 client --</p> <p>24 A. Yes, I interviewed Mr Clifford very early on in my 25 researches for this book.</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)

<p>1 Q. Might it be said that there was a interest in this 2 story?</p> <p>3 A. I think there is a public interest in the way David 4 Beckham plays football and performs as a captain of the 5 team when he was. I don't think there's any public 6 interest whatsoever in what he does in bed with anybody. 7 I think that that's not what he's employed for, it's not 8 what he's famous for, and I don't think it's anybody 9 else's business. Unfortunately, the woman who he 10 dallied with saw it, I guess, as an opportunity to make 11 some money.</p> <p>12 Q. I'll come back to that issue, if I may. 13 May I ask you about the chapters in your book which 14 address Mr Mazher Mahmood, who we're hearing from next 15 week. Your view, I think, is that virtually all of his 16 stories are unethical. Have I correctly understood it?</p> <p>17 A. I'm not saying that all of them are, no. I think 18 especially in the early days he was a fairly genuine 19 reporter, but as times went on, it seems to me, having 20 looked at a lot of his stories over a long period of 21 time, that it slowly became easier for him to take the 22 bare bones of a story, or the mere scintilla of a story, 23 and find circumstances in which he could turn it into 24 a much bigger story. The most obvious case was -- there 25 were two obvious cases, specifically the Beckhams again.</p> <p style="text-align: center;">Page 13</p>	<p>1 this could happen to me", but it was based on nothing at 2 all other than Mazher Mahmood's inventiveness.</p> <p>3 Q. You were going to mention one other story. That was the 4 first of the two.</p> <p>5 A. There was another story about a material called red 6 mercury, which nobody seems to know what it is, that was 7 allegedly being imported by a wheeler dealer in London 8 and was going to be used for bomb-making purposes. 9 Well, the stuff was never found. There was no end-user. 10 The Mr Big that Mr Mahmood was constantly writing -- all 11 his stories seemed to feature a man called Mr Big, in 12 this case a man from Saudi Arabia, which he quoted as 13 being "a hotbed of Al-Qaeda", in order, you know, to 14 suggest that it was a terrorist thing, and he explains 15 that Mr Big from Saudi Arabia was also sympathetic to 16 Muslim causes. Well, presumably, Mr Big, if he came 17 from Saudi Arabia -- it is a Muslim area, so it's not 18 unreasonable. But it's all these little weasel words 19 that get inserted into the stories to give a suggestion 20 of fear and possible danger, based in this case on 21 absolutely nothing at all, and once again people were 22 locked up, awaiting trial, on remand and the cases 23 collapsed almost instantly. And yet no redress was put 24 on the paper or Mazher Mahmood himself for this 25 tremendous waste of public time and money.</p> <p style="text-align: center;">Page 15</p>
<p>1 He claimed that they had foiled an attempt to kidnap 2 Victoria Beckham. When it came to court, which it 3 eventually did -- and I might say that quite a lot of 4 people were in jail for quite a long time awaiting 5 trial -- it turned out that there were no such case at 6 all. These were a group of people who had discussed it 7 and they had recorded -- Mazher Mahmood's agent 8 provocateur, who was a chap called Florim Gashi, an 9 Albanian who used to bring stories to him, to whom he 10 gave 10,000 quid for this particular one, recorded them 11 in a club where they used to go and play snooker, 12 saying, "Oh yes, I know what we could do for a bit of 13 money, we could kidnap the Beckhams", in the same way 14 that you might say you might win the lottery. I mean, 15 there was no serious intent there at all. It was on the 16 basis of that recording alone, which was entirely 17 speculative and not at all serious and actually had 18 absolutely no basis in anybody's real plans whatsoever, 19 that the arrests were made and the case was brought. 20 I mean, there was ultimately no evidence whatsoever of 21 any kind of conspiracy to kidnap these people, which 22 must have been frightening for the Beckhams themselves, 23 because I think their children were involved, and 24 frightening for other people, thinking -- every time 25 there's a story like this comes out, they think, "Oh,</p> <p style="text-align: center;">Page 14</p>	<p>1 And what is more, if I may add, at the same time, 2 talking of that kind of thing, on many instances he's 3 used people buying cocaine or being prepared to procure 4 cocaine for him and he has produced funds, presumably 5 from petty cash -- he's been asked about this in 6 court -- to buy cocaine in order to propagate a sting so 7 that he can then go back and write a stories about how 8 Johnny Walker, for instance, or the Earl of Hardwicke, 9 or several other individuals were prepared to buy him 10 cocaine, usually under quite a lot of duress from the 11 fake character that he was playing at the time. And 12 curiously, he's never been charged with the illegal 13 purchase of cocaine, although there are no legal grounds 14 on which he can do this to perpetrate a sting.</p> <p>15 LORD JUSTICE LEVESON: What's the most recent of these 16 stories, Mr Burden?</p> <p>17 A. Jodie Kidd, I think probably about three or four years 18 ago, he persuaded to go and buy cocaine for him and that 19 was put up as a video online. I think it might have 20 happened since this book was last published. But you 21 will find that there is a case where Jodie Kidd was set 22 up to go and provide him with some cocaine.</p> <p>23 MR JAY: It's page 210 of your book.</p> <p>24 A. Oh, it is there? It must have happened just before 25 I published this edition then. I apologise. So that</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 was in 2009, I think. I can't recall if there have been 2 more since then.</p> <p>3 Q. I think it's right to say, Mr Burden, that you remain 4 sceptical about the Pakistani cricketers issue, which of 5 course led to a conviction recently?</p> <p>6 A. Yes, it did. I'm puzzled by that. I took the view 7 almost the minute I saw that video on their website that 8 there was something odd about it, because I knew that 9 the John Higgins story, the story of the snooker player 10 apparently taking a bribe, had fallen down because the 11 video evidence had been changed by Mazher Mahmood and 12 his operatives, and that was acknowledged.</p> <p>13 What was odd about the video that was put up on the 14 News of the World website was there were instances where 15 you simply couldn't see the mouth of the man who was 16 supposed to be doing the speaking. It was a fellow 17 called Mazher Majeed, who was the agent between 18 Mazher Mahmood and the cricketers, allegedly, and 19 I opined that this video could easily have been made 20 retroactively, and that's what it seemed to me.</p> <p>21 Having said that, Mohammad Amir, the youngest of the 22 bowlers, has -- did plead guilty and I find that 23 puzzling, but I dare say there's reasons for that. 24 Nevertheless, the point is there was no actual crime 25 there. There was nobody going to go and have a bet on</p> <p style="text-align: center;">Page 17</p>	<p>1 MR JAY: You weren't approached by the defence to assist 2 them in that case, were you, Mr Burden?</p> <p>3 A. Sorry?</p> <p>4 Q. You weren't approached by the defence to assist in 5 that case, were you, for obvious reasons?</p> <p>6 A. No. No, I wasn't. I did speak to one of the defence 7 lawyers and I did speak -- take opinion elsewhere and 8 there was a feeling that possibly I could have a case, 9 but without being able to get hold of the material, it 10 was impossible to push it any further.</p> <p>11 LORD JUSTICE LEVESON: The problem might be that you're 12 obviously entitled to your opinion about any of these 13 matters, but your opinion would not be evidence in 14 court.</p> <p>15 A. I understand.</p> <p>16 LORD JUSTICE LEVESON: Unless you're deriving it from some 17 expertise, for example, in the examination of video 18 film, which you're not suggesting you have -- I'm merely 19 explaining it --</p> <p>20 A. I accept that entirely and I did have two experts lined 21 up to look at the material if I had been able to get 22 hold of it, but I wasn't able to, not surprisingly.</p> <p>23 MR JAY: I've been asked to put to you this proposition, 24 that the evidence you've just given might betray 25 a certain lack of objectivity on your part because here</p> <p style="text-align: center;">Page 19</p>
<p>1 those no-balls. There was nobody going to benefit from 2 it. It was simply Mazher Mahmood setting these people 3 up, putting pressure on them, through Mazher Majeed, to 4 do these no-balls, if they did indeed do them --</p> <p>5 I suppose I must accept that they've been found guilty 6 and perhaps they did, but there was nevertheless no 7 clear evidence that anybody was going to benefit from 8 that particular activity, from that particular crime, so 9 it was, in a sense, a non-crime. It was a non-story.</p> <p>10 The whole event was set up by Mazher Mahmood to get 11 these people, or to show that these people were prepared 12 to bowl a no ball when asked and they seem to have 13 satisfied the jury that that was the case. I have to 14 say that that didn't satisfy me.</p> <p>15 LORD JUSTICE LEVESON: Do you have any expertise in the area 16 beyond having looked at the material?</p> <p>17 A. I wasn't able to look at the raw material because 18 obviously they weren't going to let me have it and 19 indeed I did put up this opinion online and was asked by 20 Messrs Farrer to take it down, which I did, because 21 I couldn't get my hands on the original material.</p> <p>22 But I would say that after the first time I made 23 reference to it, some of the material did come down, the 24 more doubtful-looking material. Whether that was 25 a coincidence or not, I can't say.</p> <p style="text-align: center;">Page 18</p>	<p>1 you're adhering to a thesis -- no one's saying that 2 you're not entitled to adhere to it but you are -- in 3 the face of convictions reached after a fair trial by 4 a judge and jury, and you're still not changing your 5 mind, which might show that you're betraying a hostile 6 animus towards the News of the World and certainly 7 Mr Mazher Mahmood.</p> <p>8 A. Well, I wouldn't say that was entirely the case. I did 9 say I accept that since they pleaded guilty, then 10 perhaps that was the case. I am saying that from past 11 experience of the way that particular reporter operates, 12 it would have come as no surprise to me if it had been 13 manufactured, but of course I have no evidence that it 14 was. I'm, as it were, extrapolating from past 15 experience and past knowledge of stories that he has 16 produced, and indeed an instance where he quite 17 specifically did alter some video evidence that went up 18 online, which is clearly documented. So it was not an 19 unreasonable supposition, but I completely accept that 20 it is a supposition.</p> <p>21 Q. Thank you. Can I ask you, please, about some of your 22 conclusions at page 282 and following. Chapter 9.</p> <p>23 A. Mm-hm.</p> <p>24 Q. Four lines into this chapter you say: 25 "There's a growing sense in Britain that newspapers</p> <p style="text-align: center;">Page 20</p>

<p>1 like the News of the World -- by no means the only                  2 culprit -- are out of control and unaccountable because                  3 various bodies and laws in place which define the public                  4 interest and protect the privacy of both public and                  5 private individuals are manifestly too weak."                  6 So here is you writing about two or three years ago,                  7 and presumably your opinion hasn't changed much since,                  8 has it, Mr Burden?                  9 A. No, but I do detect that the general impetus is towards                  10 redressing this now, and presumably this is what this                  11 Inquiry is very much about and I have to say I'm very                  12 glad that that's the case, but certainly at the time,                  13 there were very fee people who wanted to see the PCC go                  14 then. A lot of people said, "Oh, we must keep the PCC,                  15 and we don't want a privacy law and we don't want                  16 statutory law." I sense that that has changed                  17 considerably in the last three years.                  18 Q. Can I ask you then about your ideas for the future?                  19 First of all, in relation to a privacy law, would you                  20 propose one?                  21 A. I think what it requires, if not a law about                  22 (inaudible), a definition of what -- first of all we                  23 start with the definition of what privacy is, which they                  24 have in France, and it's quite clear that it affects                  25 those aspects of a person's life which don't have</p> <p style="text-align: center;">Page 21</p>	<p>1 a public interest exception?                  2 A. Frankly, I don't, but I would hope that it retains here                  3 in the UK -- I'm a full believer of the right of                  4 investigative journalists to investigate criminality and                  5 corruption, and if that means that they must sometimes                  6 break these laws in order to achieve that result,                  7 I accept that that must be a defence for that kind of                  8 genuine investigative journalism in the case of, say,                  9 the Guardian and Jonathan Aitken, where they did break                  10 the law in order to get that evidence out, and papers                  11 like the Guardian do run serious investigations but they                  12 don't fall foul of these kind of libel and privacy                  13 actions that the News of the World and the similar                  14 newspapers do now.                  15 Q. In terms of the PCC, what are your proposals in relation                  16 to that?                  17 A. In relation to which?                  18 Q. The PCC.                  19 A. Oh, the PCC? I think that what the Colcutt committee                  20 concluded back in 1991 or 1992 that there should be --                  21 a statutory body should be put in place. I think the                  22 politicians who were responsible for not accepting                  23 Colcutt's representation recommendations were                  24 politicians who were, frankly, frightened of the press.                  25 I think what's happened in recent months has shown that</p> <p style="text-align: center;">Page 23</p>
<p>1 anything to do with their public persona, and that seems                  2 to be perfectly reasonable and perfectly sensible. If                  3 that -- insofar as the Human Rights Act gives an                  4 individual a right to privacy under section 8, it seems                  5 very clear to me that we must understand quite what                  6 privacy is, which we don't here, we don't have                  7 a statutory definition of it, and it could be that that                  8 could be encapsulated in a statutory act that did                  9 protect people's privacy in the same way that other                  10 jurisdictions have.                  11 Q. Have you researched the French Civil Code? This is                  12 page 300 of your book. It looks to the uninitiated as                  13 that the French Civil Code merely reiterates what's in                  14 Article 8 of the Convention.                  15 A. They do go on to have a clear definition. I say the                  16 notion of private life has been developed through                  17 caselaw by the French courts which have held that:                  18 "A person's private life includes his or her love                  19 life, friendships, family circumstances, leisure                  20 activities, political opinions, trade union or religious                  21 affiliation and state of health."                  22 So in other words, they have developed a fairly                  23 clear understanding of what privacy is through caselaw,                  24 which we don't appear to have done in this legislature.                  25 Q. Do you happen to know whether the Civil Code has</p> <p style="text-align: center;">Page 22</p>	<p>1 politicians need not be frightened of the press, and the                  2 fact that Parliament has been able to pull in the                  3 Murdochs and question them shows that these people are                  4 not invincible, and therefore I think there's a much                  5 stronger appetite for putting some kind of statutory                  6 body in control of the press, but at the time, of                  7 course, the press were all throwing their hands up                  8 saying, "You cannot possibly gag us", but at the same                  9 time nobody was suggesting that the defence of public                  10 interest should be removed, and as long as that defence                  11 is there, I don't see that there's any problem in saying                  12 to the press, "You cannot transgress this far into                  13 a person's private life unless you are uncovering                  14 a crime or deep corruption", and I think that's                  15 a perfectly sensible position to take, and -- but the                  16 press always complain very, very strongly at anything                  17 that suggests that they might be in any way hampered in                  18 doing what they consider their job, or in the case of                  19 the tabloid press, putting out stories that are of no                  20 public interest whatsoever but do regrettably sell                  21 newspapers.                  22 LORD JUSTICE LEVESON: It may be that although the public                  23 interest isn't necessarily defined by what the public                  24 are interested in, what the public are interested in is                  25 relevant to decisions being made by the press as to what</p> <p style="text-align: center;">Page 24</p>

<p>1 they should or shouldn't publish.</p> <p>2 A. If you completely disregard any individual's right to</p> <p>3 any kind of privacy, yes.</p> <p>4 LORD JUSTICE LEVESON: I'm not suggesting you disregard it</p> <p>5 at all, but it's part of the equation, isn't it?</p> <p>6 A. I accept that, but all I'm saying is that this kind of</p> <p>7 privacy should only be breached where there's a very</p> <p>8 good reason for doing it.</p> <p>9 LORD JUSTICE LEVESON: And do you consider that the</p> <p>10 suggestions you've been putting forward, and indeed you</p> <p>11 identified in your evidence, I think, to Parliament,</p> <p>12 would itself have a chilling effect upon the press and</p> <p>13 would limit what they need to be able to do that is in</p> <p>14 fact in the public interest? Or not?</p> <p>15 A. I don't see why it should, because if they're pursuing</p> <p>16 a story which is clearly in the public interest, and any</p> <p>17 serious grown-up journalist knows what is or isn't in</p> <p>18 the public interest, they can take that risk on the</p> <p>19 basis that they will have that defence. So I don't see</p> <p>20 why it should be a problem and I only think that the --</p> <p>21 all the press object to any kind of regulation because</p> <p>22 they don't want any kind of regulation if they -- if it</p> <p>23 can be avoided, which is understandable from their</p> <p>24 perspective, but we need protection as well.</p> <p>25 LORD JUSTICE LEVESON: I understand the point, but I'm not</p> <p style="text-align: center;">Page 25</p>	<p>1 should be the loss of one or more days' publication?</p> <p>2 A. (Nods head).</p> <p>3 LORD JUSTICE LEVESON: I wonder whether that doesn't</p> <p>4 interfere rather too extensively with the freedom of the</p> <p>5 press?</p> <p>6 A. Well, that's been put to me and my answer to that is</p> <p>7 always that if they had a serious story to tell, they</p> <p>8 could always tell it the next day. If it's a question</p> <p>9 of finding a sanction that would actually have teeth and</p> <p>10 hurt them --</p> <p>11 LORD JUSTICE LEVESON: I understand that. But I just wonder</p> <p>12 whether that doesn't risk crossing the line between what</p> <p>13 is an appropriate way to go and what then does interfere</p> <p>14 with the essential freedom that we all have to speak our</p> <p>15 minds.</p> <p>16 A. I think if they have a genuine opinion to give about</p> <p>17 anything along those lines, or, indeed, fact, they can</p> <p>18 always put it in the next day's paper. These things are</p> <p>19 not usually a matter of hot news, are they? And to lose</p> <p>20 a day's publication would cost them money at several</p> <p>21 different levels, and it would make them look very</p> <p>22 obviously guilty for their transgressions, so it had two</p> <p>23 effects, as far as I was concerned: it would, A, punish</p> <p>24 them financially, and B, it would draw the public's</p> <p>25 attention to the fact that they had transgressed badly.</p> <p style="text-align: center;">Page 27</p>
<p>1 sure that to say that anybody can decide what's in the</p> <p>2 public interest and knows what's in the public interest</p> <p>3 will actually necessarily work because different people</p> <p>4 will have different views about what's in the public</p> <p>5 interest.</p> <p>6 A. I understand that, but I think we should have a clear</p> <p>7 definition of what is the public interest as well, and</p> <p>8 I've suggested that in this book, that we define what</p> <p>9 the public interest is so that we all know what we're</p> <p>10 talking about.</p> <p>11 MR JAY: I think you said a minute ago every serious</p> <p>12 journalist knows what it is --</p> <p>13 A. Quite so, but sometimes they need reminding and I think</p> <p>14 if it was codified, it would make it easier.</p> <p>15 MR JAY: Mr Burden, you've given us a mass of helpful</p> <p>16 material in your book, which will be put to other</p> <p>17 witnesses. I'm not going to ask you to rehearse it now.</p> <p>18 You've given us the benefit of your views for the</p> <p>19 future, you've identified your source material. We're</p> <p>20 very grateful. I have no further questions for you.</p> <p>21 LORD JUSTICE LEVESON: Do you still maintain your</p> <p>22 suggestion, I think it was in your evidence, that -- in</p> <p>23 the memorandum you submitted to the Commons Select</p> <p>24 Committee on Culture, Media and Sport, that one of the</p> <p>25 potential sanctions for an independent press watchdog</p> <p style="text-align: center;">Page 26</p>	<p>1 LORD JUSTICE LEVESON: How would that cope with what is the</p> <p>2 other enormous area that we've touched upon but not</p> <p>3 really investigated as yet, which is the Internet, which</p> <p>4 is very difficult, based in this country, to regulate if</p> <p>5 the server and ISP is abroad?</p> <p>6 A. That's a whole other colossal dimension, which no doubt</p> <p>7 in due course we're going to have to deal with. But</p> <p>8 that's not something I was addressing here.</p> <p>9 LORD JUSTICE LEVESON: No, I understand. I just -- I mean,</p> <p>10 you've --</p> <p>11 A. Well, if it's possible, in due course, I suppose similar</p> <p>12 laws will have to be put into place as regards material</p> <p>13 put up on the Internet, but of course that's going to be</p> <p>14 a great deal more difficult, but again it wouldn't be</p> <p>15 a bad thing to establish even in the print press that</p> <p>16 people will have to pay for transgressions, so that when</p> <p>17 we start looking at it for online news, we're in</p> <p>18 a better position to start applying it there as well, if</p> <p>19 that becomes possible or is possible, which</p> <p>20 theoretically, I suppose, it will be in time.</p> <p>21 LORD JUSTICE LEVESON: Yes, the risk, of course, is that the</p> <p>22 risky stories won't be published in the print press but</p> <p>23 will simply go offshore and still cause all the harm</p> <p>24 that you speak of.</p> <p>25 A. In answer to that, sir, of course it doesn't to the same</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 extent because in the end material in the print press is                  2 much more widely available and more widely read. It's                  3 not a question of everybody looking for one particular                  4 blog. There is the instance of the footballer where                  5 a lot of people did know, through the Internet, the name                  6 of the footballer who was, as it were, playing away from                  7 home, but actually I didn't, because I didn't look it                  8 up, as a matter of fact, I didn't particularly care, but                  9 an awful lot of people didn't know, whereas if it had                  10 been published on the front page of the Sun, an awful                  11 lot of people would have known. I think it will be a                  12 while before that kind of information will become quite                  13 so freely available, but I accept that, yes, of course,                  14 that happens, and I don't doubt that if stories are                  15 bumped off the front page through stricter legislation,                  16 they may well appear online, but they still won't have                  17 quite the same currency.                  18 And also it means that the legitimate broadcast                  19 media can't refer to them either until they're, as it                  20 were, public domain as they've been printed by a British                  21 newspaper. So the BBC and the terrestrial broadcasters,                  22 indeed, all broadcasters, can't pick up stories from the                  23 Internet and pass them on in the way they can with                  24 newspaper stories, so I don't think it's quite such                  25 a risk, but I accept that of course that will happen,</p> <p style="text-align: center;">Page 29</p>	<p>1                  2 I N D E X                  3                  4 MR ALEXANDER OWENS (on former oath) .....2                  5 Questions from MR JAY .....2                  6 MR FRANCIS GEORGE BODEN ALDHOUSE .....35                  7 (sworn)                  8 Questions from MR JAY .....35                  9 MR PETER HENRY BURDEN (sworn) .....67                  10 Questions from MR JAY .....67                  11                  12                  13                  14                  15                  16                  17                  18                  19                  20                  21                  22                  23                  24                  25</p> <p style="text-align: right;">Page 31</p>
<p>1 but no doubt in due course some kind of restraint will                  2 be put on that.                  3 LORD JUSTICE LEVESON: Yes, well, thank you very much.                  4 A. Yes.                  5 LORD JUSTICE LEVESON: Thank you.                  6 MR JAY: Sir, that concludes the evidence for --                  7 LORD JUSTICE LEVESON: Yes. We've had to put off our other                  8 substantial witness until later in the week; is that                  9 right?                  10 MR JAY: Until tomorrow. Tomorrow the running order, the                  11 four witnesses are Mr Atkins, Mr Nott, Mr Leigh and                  12 Ms Harris. The precise order is to be determined and                  13 will be organised in the next 15 minutes.                  14 LORD JUSTICE LEVESON: Right. Thank you very much indeed.                  15 (2.45 pm)                  16 (The hearing adjourned until 10.00 am the following day)                  17                  18                  19                  20                  21                  22                  23                  24                  25</p> <p style="text-align: center;">Page 30</p>	



<p><b>A</b></p> <p>able 4:25 18:17 19:9,21,22 24:2 25:13</p> <p>abroad 28:5</p> <p>absolutely 14:18 15:21</p> <p>accept 18:5 19:20 20:9,19 23:7 25:6 29:13,25</p> <p>accepting 23:22</p> <p>account 3:25</p> <p>accounts 6:11</p> <p>achieve 23:6</p> <p>acknowledged 17:12</p> <p>act 8:16 22:3,8</p> <p>actions 23:13</p> <p>activities 10:5,5 22:20</p> <p>activity 18:8</p> <p>actual 17:24</p> <p>add 16:1</p> <p>added 11:2</p> <p>additional 3:20</p> <p>address 13:14</p> <p>addressing 28:8</p> <p>adhere 20:2</p> <p>adhering 20:1</p> <p>adjourned 30:16</p> <p>affiliation 22:21</p> <p>Afghanistan 4:24</p> <p>afraid 4:6</p> <p>agent 14:7 17:17</p> <p>ago 2:1 5:16,22 16:18 21:6 26:11</p> <p>Aitken 23:9</p> <p>Albanian 14:9</p> <p>ALDHOUSE 31:5</p> <p>ALEXANDER 31:3</p> <p>allegedly 15:7 17:18</p> <p>alter 20:17</p> <p>Al-Qaeda 15:13</p> <p>Amir 17:21</p> <p>animus 20:6</p> <p>answer 2:22 27:6 28:25</p> <p>anybody 13:6,8 18:7 26:1</p> <p>anybody's 14:18</p> <p>apologies 2:5</p> <p>apologise 16:25</p> <p>apparently 17:10</p> <p>appear 22:24 29:16</p> <p>appetite 24:5</p> <p>applying 28:18</p> <p>approached 5:6 19:1,4</p> <p>appropriate</p>	<p>27:13</p> <p>Arabia 15:12,15 15:17</p> <p>area 15:17 18:15 28:2</p> <p>arising 7:25</p> <p>Arnold 9:4</p> <p>arrests 14:19</p> <p>Article 22:14</p> <p>articles 9:22</p> <p>ascertain 4:9</p> <p>aside 4:18</p> <p>asked 4:1 16:5 18:12,19 19:23</p> <p>aspects 21:25</p> <p>Assassin 6:9</p> <p>assist 19:1,4</p> <p>Atkins 30:11</p> <p>attempt 14:1</p> <p>attention 4:5 9:16 27:25</p> <p>attributed 8:7</p> <p>author 1:19</p> <p>available 4:19 29:2,13</p> <p>avoided 25:23</p> <p>awaiting 14:4 15:22</p> <p>award 12:5</p> <p>aware 4:2</p> <p>awful 29:9,10</p> <hr/> <p><b>B</b></p> <p>B 27:24</p> <p>back 5:14 10:8,9 13:12 16:7 23:20</p> <p>background 3:14 5:1,2 7:20</p> <p>bad 28:15</p> <p>badly 27:25</p> <p>ball 18:12</p> <p>banded 12:13</p> <p>bare 13:22</p> <p>bars 6:20</p> <p>based 9:22 15:1 15:20 28:4</p> <p>basically 11:1</p> <p>basis 14:16,18 25:19</p> <p>BBC 29:21</p> <p>bear 2:3</p> <p>bearing 7:9</p> <p>beast 6:18,19</p> <p>Beckham 13:4 14:2</p> <p>Beckhams 13:25 14:13,22</p> <p>bed 3:16 13:6</p> <p>behalf 12:8</p> <p>believe 11:18</p> <p>believer 23:3</p> <p>benefit 18:1,7 26:18</p> <p>bet 17:25</p> <p>betray 19:24</p> <p>betraying 20:5</p>	<p>better 8:25 28:18</p> <p>beyond 18:16</p> <p>big 10:16 15:10 15:11,15,16</p> <p>bigger 9:1 13:24</p> <p>bit 1:18 2:2 11:2 14:12</p> <p>blog 29:4</p> <p>blown 12:17</p> <p>Bob 3:5 9:21 11:8</p> <p>BODEN 31:5</p> <p>bodies 21:3</p> <p>Bodmin 6:18</p> <p>body 23:21 24:6</p> <p>bomb-making 15:8</p> <p>bones 13:22</p> <p>book 1:22 2:4 3:5 4:17 5:5,14 5:15 6:8 7:3,4 7:22,23 8:1,8 12:25 13:13 16:20,23 22:12 26:8,16</p> <p>books 1:21</p> <p>bottom 5:4 9:16</p> <p>bowl 18:12</p> <p>bowlers 17:22</p> <p>boys 6:3</p> <p>breached 25:7</p> <p>break 23:6,9</p> <p>breakfast 3:16</p> <p>bribe 17:10</p> <p>bring 14:9</p> <p>Britain 20:25</p> <p>British 29:20</p> <p>broadcast 29:18</p> <p>broadcaster 4:22 4:23</p> <p>broadcasters 29:21,22</p> <p>brother 4:21,25</p> <p>brought 14:19</p> <p>bumped 29:15</p> <p>Burden 1:4,5,7 1:11,12,24 4:8 12:4 16:16 17:3 19:2 21:8 26:15 31:8</p> <p>business 13:9</p> <p>buy 16:6,9,18</p> <p>buying 16:3</p> <p>B&amp;B 11:20</p> <hr/> <p><b>C</b></p> <p>call 6:8</p> <p>called 5:16,17,24 6:9 14:8 15:5 15:11 17:17</p> <p>calls 4:14</p> <p>Camera 6:9</p> <p>Canson 5:25</p> <p>captain 13:4</p> <p>care 8:24 29:8</p> <p>careful 2:22</p> <p>case 2:8 3:9 5:9</p>	<p>10:2 11:16 12:16 13:24 14:5,19 15:12 15:20 16:21 18:13 19:2,5,8 20:8,10 21:12 23:8 24:18</p> <p>caselaw 22:17,23</p> <p>cases 13:25 15:22</p> <p>cash 16:5</p> <p>casting 5:10</p> <p>cause 28:23</p> <p>causes 15:16</p> <p>certain 19:25</p> <p>certainly 5:25 11:8 12:18 20:6 21:12</p> <p>changed 1:22 17:11 21:7,16</p> <p>changing 20:4</p> <p>Channel 4:2</p> <p>chap 14:8</p> <p>chapter 20:22,24</p> <p>chapters 4:17 13:13</p> <p>character 16:11</p> <p>charged 16:12</p> <p>cheats 6:2</p> <p>chief 1:25</p> <p>children 14:23</p> <p>chilling 25:12</p> <p>chum 6:3</p> <p>circumstances 6:1 13:23 22:19</p> <p>Civil 22:11,13,25</p> <p>claim 9:18</p> <p>claimed 14:1</p> <p>claims 6:17</p> <p>clear 2:8,21 3:2 18:7 21:24 22:5,15,23 26:6</p> <p>clearly 20:18 25:16</p> <p>client 12:23</p> <p>Clifford 12:18 12:21,24</p> <p>club 14:11</p> <p>cocaine 16:3,4,6 16:10,13,18,22</p> <p>Code 22:11,13 22:25</p> <p>codified 26:14</p> <p>coincidence 18:25</p> <p>Colcutt 23:19</p> <p>Colcutt's 23:23</p> <p>collapsed 15:23</p> <p>colossal 28:6</p> <p>come 10:8,9 13:12 18:23 20:12</p> <p>comes 14:25</p> <p>comfortable 1:8</p> <p>committee 23:19</p>	<p>26:24</p> <p>Commons 26:23</p> <p>comparatively 10:5</p> <p>complain 24:16</p> <p>complete 11:10 11:11</p> <p>completely 8:16 20:19 25:2</p> <p>concerned 10:15 27:23</p> <p>concluded 23:20</p> <p>concludes 30:6</p> <p>conclusions 4:6 20:22</p> <p>confidentiality 12:22</p> <p>conjunction 5:11</p> <p>consider 24:18 25:9</p> <p>considerable 3:13 8:22</p> <p>considerably 21:17</p> <p>conspiracy 14:21</p> <p>constantly 15:10</p> <p>contact 2:23 3:3</p> <p>contacts 2:10</p> <p>control 21:2 24:6</p> <p>Convention 22:14</p> <p>conversations 12:21</p> <p>conviction 17:5</p> <p>convictions 20:3</p> <p>cope 28:1</p> <p>copied 8:1</p> <p>correct 1:23,24 2:24,25</p> <p>correctly 13:16</p> <p>corruption 23:5 24:14</p> <p>cost 27:20</p> <p>country 28:4</p> <p>countryside 10:6</p> <p>couple 5:16</p> <p>course 6:24,25 11:13 17:5 20:13 24:7 28:7,11,13,21 28:25 29:13,25 30:1</p> <p>court 14:2 16:6 19:14</p> <p>courts 22:17</p> <p>covered 4:5</p> <p>cricketers 17:4 17:18</p> <p>crime 1:25 17:24 18:8 24:14</p> <p>criminality 23:4</p> <p>crossing 27:12</p> <p>culprit 21:2</p> <p>culture 7:9,13,14 7:19 26:24</p> <p>cupboard 11:9 11:10</p>	<p>curiously 16:12</p> <p>currency 29:17</p> <p>Cutler 5:7,21,23 6:7 9:13</p> <p>Cutler's 5:9</p> <hr/> <p><b>D</b></p> <p>D 31:2</p> <p>Daily 1:25</p> <p>dallied 13:10</p> <p>damage 8:14</p> <p>danger 15:20</p> <p>dare 17:23</p> <p>date 7:7</p> <p>dated 1:13</p> <p>dates 5:20</p> <p>David 13:3</p> <p>day 27:8 30:16</p> <p>days 13:18 27:1</p> <p>day's 27:18,20</p> <p>deal 4:18 9:8 12:1 28:7,14</p> <p>dealer 15:7</p> <p>deals 4:2</p> <p>decide 26:1</p> <p>decisions 24:25</p> <p>declined 11:14</p> <p>deep 24:14</p> <p>defence 19:1,4,6 23:7 24:9,10 25:19</p> <p>define 21:3 26:8</p> <p>defined 24:23</p> <p>definition 21:22 21:23 22:7,15 26:7</p> <p>denied 2:20</p> <p>deputy 6:22,23</p> <p>deriving 19:16</p> <p>describe 2:9</p> <p>detail 3:14 5:19 9:11 10:24</p> <p>detailed 7:2</p> <p>detect 21:9</p> <p>determined 30:12</p> <p>developed 22:16 22:22</p> <p>development 7:13</p> <p>different 26:3,4 27:21</p> <p>difficult 28:4,14</p> <p>dimension 28:6</p> <p>direct 2:10,14 3:4</p> <p>directly 3:6</p> <p>discussed 3:9 14:6</p> <p>discussions 9:23</p> <p>disinclined 4:1</p> <p>dismissal 9:18</p> <p>dismissed 6:15 6:17</p> <p>disproportionate 8:14</p> <p>disregard 25:2,4</p>	<p>documented 20:18</p> <p>doing 3:19 17:16 24:18 25:8</p> <p>dole 6:2</p> <p>domain 9:15 12:2 29:20</p> <p>Dorset 3:12,18 10:6</p> <p>doubt 28:6 29:14 30:1</p> <p>doubtful-looking 18:24</p> <p>draw 9:16 27:24</p> <p>drawn 4:5</p> <p>due 28:7,11 30:1</p> <p>duress 16:10</p> <hr/> <p><b>E</b></p> <p>E 31:2</p> <p>Earl 16:8</p> <p>early 3:8 5:1,2 9:7 12:24 13:18</p> <p>easier 13:21 26:14</p> <p>easily 17:19</p> <p>East 9:21</p> <p>edited 6:21</p> <p>edition 3:10 5:5 8:3 16:25</p> <p>editor 8:8</p> <p>effect 25:12</p> <p>effects 27:23</p> <p>either 29:19</p> <p>else's 13:9</p> <p>embedded 7:18</p> <p>embellished 11:1</p> <p>employed 13:7</p> <p>employment 9:18</p> <p>encapsulated 22:8</p> <p>ended 9:4</p> <p>end-user 15:9</p> <p>engage 11:21</p> <p>enormous 28:2</p> <p>entirely 8:16 14:16 19:20 20:8</p> <p>entitled 19:12 20:2</p> <p>entrapping 7:18</p> <p>equation 25:5</p> <p>especially 13:18</p> <p>essential 27:14</p> <p>Essex 3:11</p> <p>establish 28:15</p> <p>establishment 3:17</p> <p>ethics 7:10</p> <p>ethos 7:19</p> <p>event 18:10</p> <p>events 3:14,25 6:10 10:13</p> <p>eventually 6:15 14:3</p>
---	---	---	--	--	---	---



<b>Mm-hm</b> 20:23 <b>Mohammad</b> 17:21 <b>money</b> 13:11 14:13 15:25 27:20 <b>months</b> 23:25 <b>mouth</b> 17:15 <b>Mulcaire</b> 2:24 <b>Murdochs</b> 24:3 <b>Muslim</b> 15:16,17	<b>odd</b> 17:8,13 <b>offer</b> 3:21 11:14 <b>offered</b> 10:11 11:23 <b>offshore</b> 28:23 <b>Oh</b> 14:12,25 16:24 21:14 23:19 <b>Okay</b> 5:3 11:25 <b>once</b> 15:21 <b>one's</b> 20:1 <b>online</b> 16:19 18:19 20:18 28:17 29:16 <b>opening</b> 2:8 <b>operates</b> 20:11 <b>operating</b> 5:21 5:23 6:14 <b>operatives</b> 17:12 <b>opined</b> 17:19 <b>opinion</b> 18:19 19:7,12,13 21:7 27:16 <b>opinions</b> 22:20 <b>opportunity</b> 13:10 <b>order</b> 15:13 16:6 23:6,10 30:10 30:12 <b>orders</b> 6:17 <b>organised</b> 11:23 30:13 <b>original</b> 18:21 <b>originally</b> 7:23 <b>outlined</b> 5:13,18 <b>outside</b> 6:4 <b>outstanding</b> 7:14 <b>overseas</b> 4:24 <b>OWENS</b> 31:3	<b>PCC</b> 21:13,14 23:15,18,19 <b>people</b> 2:11 4:13 7:18,21 10:2 11:20 14:4,6 14:21,24 15:21 16:3 18:2,11 18:11 21:13,14 24:3 26:3 28:16 29:5,9 29:11 <b>people's</b> 22:9 <b>perfectly</b> 22:2,2 24:15 <b>performs</b> 13:4 <b>period</b> 6:13 13:20 <b>perpetrate</b> 16:14 <b>persona</b> 22:1 <b>person's</b> 21:25 22:18 24:13 <b>perspective</b> 25:24 <b>persuaded</b> 16:18 <b>Peter</b> 1:4,5,11,24 31:8 <b>petty</b> 16:5 <b>phone</b> 2:9,12 4:14 7:22,24 <b>photograph</b> 2:2 6:4 <b>photographer</b> 10:7 <b>photographers</b> 5:7 <b>photographs</b> 5:9 9:13,15 10:7 10:10 <b>photos</b> 7:18 <b>pick</b> 29:22 <b>picture</b> 6:18,19 <b>piece</b> 10:4 <b>place</b> 3:18 21:3 23:21 28:12 <b>placed</b> 3:11 <b>places</b> 4:24 <b>plans</b> 14:18 <b>play</b> 14:11 <b>player</b> 17:9 <b>playing</b> 16:11 29:6 <b>plays</b> 13:4 <b>plead</b> 17:22 <b>pleaded</b> 20:9 <b>please</b> 1:4,7,10 2:6 8:11 20:21 <b>pm</b> 1:2 30:15 <b>point</b> 8:18 9:1 10:21 17:24 25:25 <b>points</b> 12:3 <b>political</b> 22:20 <b>politicians</b> 23:22 23:24 24:1 <b>position</b> 24:15 28:18 <b>possibility</b> 10:4	<b>possible</b> 15:20 28:11,19,19 <b>possibly</b> 19:8 24:8 <b>potential</b> 26:25 <b>practice</b> 11:4 <b>practices</b> 7:9 <b>precise</b> 2:10 30:12 <b>precisely</b> 12:13 <b>prepared</b> 2:17 7:21 16:3,9 18:11 <b>preparing</b> 5:5 <b>press</b> 7:10 23:24 24:1,6,7,12,16 24:19,25 25:12 25:21 26:25 27:5 28:15,22 29:1 <b>pressure</b> 18:3 <b>presumably</b> 10:6 10:8 15:16 16:4 21:7,10 <b>print</b> 28:15,22 29:1 <b>printed</b> 29:20 <b>privacy</b> 21:4,15 21:19,23 22:4 22:6,9,23 23:12 25:3,7 <b>private</b> 8:16 21:5 22:16,18 24:13 <b>probably</b> 9:11 10:2,16 16:17 <b>problem</b> 19:11 24:11 25:20 <b>proceedings</b> 7:2 <b>procure</b> 16:3 <b>produced</b> 1:20 16:4 20:16 <b>producing</b> 6:18 <b>programme</b> 4:2 <b>progresses</b> 12:17 <b>propagate</b> 16:6 <b>proposals</b> 23:15 <b>propose</b> 21:20 <b>proposition</b> 19:23 <b>protect</b> 21:4 22:9 <b>protection</b> 25:24 <b>provide</b> 16:22 <b>provided</b> 1:12 5:8 <b>provocateur</b> 14:8 <b>public</b> 7:3 9:15 12:2 13:3,5 15:25 21:3,4 22:1 23:1 24:9 24:20,22,23,24 25:14,16,18 26:2,2,4,7,9 29:20 <b>publication</b> 27:1 27:20 <b>publicly</b> 4:18	<b>public's</b> 27:24 <b>publish</b> 25:1 <b>published</b> 5:15 8:3 16:20,25 28:22 29:10 <b>pull</b> 24:2 <b>puma</b> 6:19 <b>punish</b> 27:23 <b>purchase</b> 16:13 <b>purposes</b> 15:8 <b>pursuing</b> 25:15 <b>push</b> 19:10 <b>put</b> 3:12 4:7,14 11:4 15:23 16:19 17:13 18:19 19:23 23:21 26:16 27:6,18 28:12 28:13 30:2,7 <b>putting</b> 18:3 24:5 24:19 25:10 <b>puzzled</b> 17:6 <b>puzzling</b> 17:23	<b>public's</b> 27:24 <b>publish</b> 25:1 <b>published</b> 5:15 8:3 16:20,25 28:22 29:10 <b>pull</b> 24:2 <b>puma</b> 6:19 <b>punish</b> 27:23 <b>purchase</b> 16:13 <b>purposes</b> 15:8 <b>pursuing</b> 25:15 <b>push</b> 19:10 <b>put</b> 3:12 4:7,14 11:4 15:23 16:19 17:13 18:19 19:23 23:21 26:16 27:6,18 28:12 28:13 30:2,7 <b>putting</b> 18:3 24:5 24:19 25:10 <b>puzzled</b> 17:6 <b>puzzling</b> 17:23	<b>redress</b> 15:23 <b>redressing</b> 21:10 <b>refer</b> 3:5 29:19 <b>reference</b> 18:23 <b>referred</b> 2:7 7:4 <b>regarding</b> 7:14 <b>regards</b> 28:12 <b>regrettably</b> 24:20 <b>regulate</b> 28:4 <b>regulation</b> 25:21 25:22 <b>rehearse</b> 26:17 <b>reiterates</b> 22:13 <b>rejected</b> 9:18 <b>related</b> 12:8 <b>relation</b> 2:8 4:16 21:19 23:15,17 <b>relevant</b> 24:25 <b>religious</b> 22:20 <b>remain</b> 17:3 <b>remand</b> 15:22 <b>reminding</b> 26:13 <b>removed</b> 24:10 <b>rent</b> 6:2 <b>reporter</b> 1:25 3:22 13:19 20:11 <b>representation</b> 23:23 <b>requires</b> 21:21 <b>researched</b> 22:11 <b>researches</b> 12:25 <b>resemblance</b> 2:3 <b>respects</b> 8:24 <b>responsible</b> 23:22 <b>restraint</b> 30:1 <b>result</b> 2:14 7:1 23:6 <b>retains</b> 23:2 <b>retired</b> 2:1 <b>retroactively</b> 17:20 <b>return</b> 4:14 <b>reverse</b> 9:24 <b>right</b> 2:19,21 3:12 4:12 7:20 12:8 17:3 22:4 23:3 25:2 30:9 30:14 <b>rightly</b> 9:16 <b>Rights</b> 22:3 <b>ripe</b> 11:6 <b>risk</b> 25:18 27:12 28:21 29:25 <b>risks</b> 7:21 <b>risky</b> 28:22 <b>romped</b> 11:9 <b>Royal</b> 1:21 2:7 <b>run</b> 23:11 <b>running</b> 3:16 8:21 11:19 30:10 <b>runs</b> 1:13 <b>run-of-the-mill</b>	10:14 <b>rural</b> 10:19
<b>N</b>	<b>P</b>		<b>Q</b>	<b>R</b>	<b>S</b>		
<b>N</b> 31:2 <b>name</b> 1:10 8:8 29:5 <b>nature</b> 3:17 <b>naturist</b> 3:17 <b>necessarily</b> 24:23 26:3 <b>necessary</b> 8:7 9:11 <b>need</b> 10:24 24:1 25:13,24 26:13 <b>never</b> 4:5 15:9 16:12 <b>nevertheless</b> 17:24 18:6 <b>Neville</b> 3:22 <b>news</b> 2:12,15 3:16,19 5:6 6:21 8:8,13 12:5,12 17:14 20:6 21:1 23:13 27:19 28:17 <b>newspaper</b> 7:16 7:19 12:8 29:21,24 <b>newspapers</b> 20:25 23:14 24:21 <b>Nods</b> 27:2 <b>nonsense</b> 11:10 <b>non-crime</b> 18:9 <b>non-fiction</b> 1:20 <b>non-story</b> 18:9 <b>notion</b> 8:21 22:16 <b>Nott</b> 30:11 <b>no-balls</b> 18:1,4 <b>nude</b> 11:20 <b>nudist</b> 11:19 <b>nutshell</b> 10:1	<b>oath</b> 31:3 <b>obeying</b> 6:17 <b>object</b> 25:21 <b>objectivity</b> 19:25 <b>obtain</b> 3:25 <b>obvious</b> 13:24,25 19:5 <b>obviously</b> 9:22 18:18 19:12 27:22 <b>October</b> 1:13	<b>oath</b> 31:3 <b>obeying</b> 6:17 <b>object</b> 25:21 <b>objectivity</b> 19:25 <b>obtain</b> 3:25 <b>obvious</b> 13:24,25 19:5 <b>obviously</b> 9:22 18:18 19:12 27:22 <b>October</b> 1:13	<b>question</b> 3:24 24:3 27:8 29:3 <b>questions</b> 1:6 26:20 31:4,7,9 <b>quid</b> 14:10 <b>quite</b> 2:1,15 5:1 11:1,19 14:3,4 16:10 20:16 21:24 22:5 26:13 29:12,17 29:24 <b>quote</b> 8:6 <b>quoted</b> 15:12	<b>radio</b> 4:23 <b>raw</b> 18:17 <b>reached</b> 20:3 <b>read</b> 2:7 29:2 <b>readers</b> 6:6 <b>reading</b> 4:18 11:18 <b>real</b> 14:18 <b>really</b> 10:24 28:3 <b>reason</b> 7:12 10:20 25:8 <b>reasonable</b> 22:2 <b>reasons</b> 17:23 19:5 <b>Rebecca</b> 12:2,11 <b>Rebekah</b> 6:22 <b>recall</b> 17:1 <b>recipient</b> 12:7 <b>recommendati...</b> 23:23 <b>record</b> 2:16,16 7:3 <b>recorded</b> 14:7,10 <b>recording</b> 14:16 <b>recounts</b> 6:10 <b>red</b> 15:5 <b>redaction</b> 1:15	<b>restraint</b> 30:1 <b>result</b> 2:14 7:1 23:6 <b>retains</b> 23:2 <b>retired</b> 2:1 <b>retroactively</b> 17:20 <b>return</b> 4:14 <b>reverse</b> 9:24 <b>right</b> 2:19,21 3:12 4:12 7:20 12:8 17:3 22:4 23:3 25:2 30:9 30:14 <b>rightly</b> 9:16 <b>Rights</b> 22:3 <b>ripe</b> 11:6 <b>risk</b> 25:18 27:12 28:21 29:25 <b>risks</b> 7:21 <b>risky</b> 28:22 <b>romped</b> 11:9 <b>Royal</b> 1:21 2:7 <b>run</b> 23:11 <b>running</b> 3:16 8:21 11:19 30:10 <b>runs</b> 1:13 <b>run-of-the-mill</b>	<b>sanction</b> 27:9 <b>sanctions</b> 26:25 <b>satisfied</b> 18:13 <b>satisfy</b> 18:14 <b>Saudi</b> 15:12,15 15:17 <b>saw</b> 13:10 17:7 <b>saying</b> 13:17 14:12 20:1,10 24:8,11 25:6 <b>sceptical</b> 17:4 <b>scintilla</b> 13:22 <b>scoop</b> 12:6 <b>second</b> 5:5 8:3 <b>section</b> 22:4 <b>see</b> 3:8,13,22 17:15 21:13 24:11 25:15,19 <b>Select</b> 26:23 <b>sell</b> 24:20 <b>sense</b> 4:11 5:20 18:9 20:25 21:16 <b>sensible</b> 22:2 24:15 <b>sent</b> 3:21 <b>serious</b> 14:15,17 23:11 25:17 26:11 27:7 <b>server</b> 28:5 <b>services</b> 3:21 11:15,23 <b>set</b> 4:23 7:20 8:15 16:21 18:10 <b>setting</b> 18:2 <b>sexual</b> 10:17 11:21 <b>Sheiks</b> 1:21 2:6 <b>shenanigans</b> 11:21 <b>shot</b> 6:20 7:1 <b>show</b> 18:11 20:5 <b>showed</b> 7:13 10:13 <b>shown</b> 23:25 <b>shows</b> 24:3 <b>signed</b> 1:14 <b>similar</b> 23:13 28:11 <b>simply</b> 4:14 5:9 6:19 7:12,17 10:2 17:15 18:2 28:23 <b>sincere</b> 2:5 <b>sir</b> 28:25 30:6 <b>sit</b> 1:7 <b>slightly</b> 10:17 <b>slowly</b> 13:21 <b>smut</b> 10:14,19 <b>snooker</b> 14:11 17:9 <b>somebody</b> 8:22	

<b>somewhat</b> 7:6	3:14 10:12	14:23,25 16:17	<hr/> <b>U</b> <hr/>	<b>well-respected</b>	<b>1991</b> 23:20
<b>Sorry</b> 19:3	<b>substantial</b>	16:19 17:1,3	<b>UK</b> 23:3	4:22	<b>1992</b> 23:20
<b>sort</b> 7:20 9:24	12:19 30:8	21:21 23:19,21	<b>ultimately</b> 14:20	<b>went</b> 3:13 6:7	<b>1999</b> 6:15 7:7
10:19 11:22	<b>Sue</b> 3:5 9:21 11:9	23:25 24:4,14	<b>unaccountable</b>	13:19 20:17	<hr/> <b>2</b> <hr/>
12:16	<b>suffer</b> 8:15	25:11,20 26:6	21:2	<b>weren't</b> 11:12	2 31:3,4
<b>source</b> 26:19	<b>sufficiently</b> 6:5	26:11,13,22	<b>uncovering</b>	18:18 19:1,4	<b>2.00</b> 1:2
<b>sources</b> 4:9	<b>suggest</b> 15:14	27:16 29:11,24	24:13	<b>we're</b> 4:8 5:20,22	<b>2.45</b> 30:15
<b>sparked</b> 7:23	<b>suggested</b> 26:8	<b>thinking</b> 14:24	<b>understand</b>	13:14 26:9,19	<b>20</b> 10:16
<b>speak</b> 4:11,19	<b>suggesting</b> 19:18	<b>third</b> 3:2 5:3	19:15 22:5	28:7,17	<b>2005</b> 12:5
19:6,7 27:14	24:9 25:4	<b>thought</b> 6:1,7	25:25 26:6	<b>we've</b> 1:15 2:7	<b>2008</b> 8:3
28:24	<b>suggestion</b> 15:19	<b>three</b> 16:17 21:6	27:11 28:9	28:2 30:7	<b>2009</b> 3:9 8:4,5,5
<b>speaking</b> 17:16	26:22	21:17	<b>understandable</b>	<b>whatsoever</b> 13:6	8:5 17:1
<b>specific</b> 7:25 9:3	<b>suggestions</b>	<b>throwing</b> 24:7	25:23	14:18,20 24:20	<b>2011</b> 1:13
<b>specifically</b> 3:1	25:10	<b>Thurlbeck</b> 3:22	<b>understanding</b>	<b>wheeler</b> 15:7	<b>210</b> 16:23
13:25 20:17	<b>suggests</b> 24:17	3:25 4:11 9:24	22:23	<b>widely</b> 29:2,2	<b>282</b> 20:22
<b>speculative</b>	<b>sum</b> 12:11,19,19	10:3 11:11	<b>understood</b>	<b>win</b> 14:14	<hr/> <b>3</b> <hr/>
14:17	<b>sums</b> 12:13	12:7	13:16	<b>witness</b> 1:4,12	30 10:16
<b>spoke</b> 2:17 4:10	<b>Sun</b> 29:10	<b>Thurlbeck's</b>	<b>unethical</b> 13:16	5:4 30:8	<b>300</b> 22:12
4:21	<b>suppose</b> 18:5	11:23	<b>unfair</b> 9:17	<b>witnesses</b> 26:17	<b>300,000</b> 12:14
<b>spoken</b> 2:11,15	28:11,20	<b>time</b> 2:1 5:22,24	<b>unfortunately</b>	30:11	<b>35</b> 31:5,7
3:6,24	<b>supposed</b> 17:16	6:13,23,23	3:11 13:9	<b>woman</b> 13:9	<hr/> <b>4</b> <hr/>
<b>Sport</b> 26:24	<b>supposition</b>	8:18 13:21	<b>uninitiated</b>	<b>wonder</b> 27:3,11	4 4:2
<b>spot</b> 10:18	20:19,20	14:4,24 15:25	22:12	<b>words</b> 15:18	<hr/> <b>6</b> <hr/>
<b>standard</b> 11:4	<b>sure</b> 6:11 26:1	16:1,11 18:22	<b>union</b> 22:20	22:22	67 31:8,9
<b>start</b> 21:23 28:17	<b>surprise</b> 20:12	21:12 24:6,9	<b>unreasonable</b>	<b>work</b> 8:2 26:3	<hr/> <b>8</b> <hr/>
28:18	<b>surprisingly</b>	28:20	15:18 20:19	<b>World</b> 2:12,15	8 22:4,14
<b>starts</b> 9:13	19:22	<b>times</b> 13:19	<b>unusual</b> 10:4,5	3:16,19 5:6	<b>800,000</b> 12:15
<b>state</b> 22:21	<b>sworn</b> 1:5 31:6,8	<b>titillating</b> 6:6	<b>usually</b> 16:10	6:21 8:13 12:5	<b>82</b> 8:11
<b>statement</b> 1:12	<b>sympathetic</b>	<b>titles</b> 1:20	27:19	12:12 17:14	<b>83</b> 9:8
2:17,21 3:3 5:4	15:15	<b>told</b> 3:1,13 4:10	<hr/> <b>V</b> <hr/>	20:6 21:1	<hr/> <b>9</b> <hr/>
11:8	<hr/> <b>T</b> <hr/>	9:14,17 11:11	<b>various</b> 10:21	23:13	9 20:22
<b>stations</b> 4:23,24	<b>tabloid</b> 24:19	12:18	21:3	<b>wouldn't</b> 6:11	<b>92</b> 9:14
<b>statutory</b> 21:16	<b>take</b> 7:21 13:21	<b>tomorrow</b> 30:10	<b>version</b> 1:14	20:8 28:14	
22:7,8 23:21	18:20 19:7	30:10	<b>victim</b> 8:15	<b>write</b> 10:4,8,9	
24:5	24:15 25:18	<b>top</b> 10:22	<b>Victoria</b> 14:2	16:7	
<b>Steve</b> 5:7,13,17	<b>talk</b> 4:1,13	<b>touched</b> 3:10	<b>video</b> 16:19 17:7	<b>writing</b> 15:10	
<b>sting</b> 9:7,24 16:6	<b>talking</b> 5:20,22	28:2	17:11,13,19	21:6	
16:14	16:2 26:10	<b>trade</b> 22:20	19:17 20:17	<b>written</b> 1:22 6:8	
<b>stories</b> 5:10	<b>team</b> 13:5	<b>tragedy</b> 9:4	<b>view</b> 13:15 17:6	<hr/> <b>X</b> <hr/>	
13:16,20 14:9	<b>teeth</b> 27:9	<b>transgress</b> 24:12	<b>views</b> 26:4,18	<b>X</b> 31:2	
15:11,19 16:7	<b>television</b> 4:23	<b>transgressed</b>	<b>virtually</b> 13:15	<hr/> <b>Y</b> <hr/>	
16:16 20:15	<b>tell</b> 1:18 10:12	27:25		<b>year</b> 12:6	
24:19 28:22	27:7,8	<b>transgressions</b>		<b>years</b> 5:16 16:17	
29:14,22,24	<b>tend</b> 12:17	27:22 28:16		21:6,17	
<b>story</b> 3:6 6:4	<b>term</b> 7:16	<b>Trappings</b> 1:21		<b>YMCA</b> 6:3,4	
7:17 8:21 9:1,4	<b>terms</b> 2:10 4:25	2:7		<b>youngest</b> 17:21	
10:1,9,9,12,14	23:15	<b>tremendous</b>		<hr/> <b>Z</b> <hr/>	
10:16,17,18,22	<b>terrestrial</b> 29:21	15:25	<b>Wade</b> 6:22	<b>zoo</b> 6:20	
11:2 12:3,9,10	<b>terrorist</b> 15:14	<b>Trevor</b> 5:25	<b>Walker</b> 16:8		
12:17 13:2,22	<b>thank</b> 1:9 7:25	<b>trial</b> 14:5 15:22	<b>wander</b> 11:20		
13:22,24 14:25	20:21 30:3,5	20:3	<b>want</b> 21:15,15		
15:3,5 17:9,9	30:14	<b>tribunal</b> 6:16	25:22		
25:16 27:7	<b>theoretically</b>	9:19	<b>wanted</b> 4:8 11:21		
<b>strange</b> 3:17	28:20	<b>tried</b> 2:14 4:12	21:13		
<b>Street</b> 1:23	<b>thesis</b> 20:1	4:13	<b>Waseem</b> 4:21		
<b>stricter</b> 29:15	<b>they'd</b> 6:3	<b>trouble</b> 11:7	<b>wasn't</b> 6:19		
<b>stronger</b> 11:2	<b>thing</b> 11:5 15:14	7:15	18:17 19:6,22		
24:5	16:2 28:15	<b>truthful</b> 6:10	<b>waste</b> 15:25		
<b>strongly</b> 24:16	<b>things</b> 7:21 11:13	<b>trying</b> 9:1	<b>watchdog</b> 26:25		
<b>struggling</b> 2:2	27:18	<b>turn</b> 13:23	<b>way</b> 2:18 11:2		
<b>stuff</b> 15:9	<b>think</b> 1:15 4:11	<b>turned</b> 11:3,15	13:3 14:13		
<b>stunting</b> 5:8 7:18	4:17 6:14,15	14:5	20:11 22:9		
<b>submitted</b> 6:21	6:22 7:12 8:3	<b>two</b> 1:20 2:20	24:17 27:13		
26:23	9:1,9 10:25	4:17 5:6 7:23	29:23		
<b>subsequent</b> 7:21	11:1,5,6 13:3,5	12:3 13:25	<b>weak</b> 21:5		
10:13	13:7,8,15,17	15:4 19:20	<b>weasel</b> 15:18		
<b>subsequently</b>		21:6 27:22	<b>website</b> 17:7,14		
			<b>week</b> 13:15 30:8		
			<b>well-known</b> 5:24		