

<p>1 Monday 12 November 2011</p> <p>2</p> <p>3 (Hearing in private)</p> <p>4</p> <p>5 (10.30 am)</p> <p>6 LORD JUSTICE LEVESON: For good reason, this evidence is</p> <p>7 being heard in circumstances that, although the</p> <p>8 witness's account will be provided orally, it will not</p> <p>9 be screened visually either to the marquee or to the</p> <p>10 public. I make that order having regard to all the</p> <p>11 circumstances of the case.</p> <p>12 I add only this: the public might be concerned that</p> <p>13 although the Inquiry was due to start at 10 o'clock, it</p> <p>14 is now 10.30. In fact, the Inquiry has been engaged</p> <p>15 upon issues of law heard in private since 9.30.</p> <p>16 Thank you very much.</p> <p>17 MR BARR: Sir, good morning. Can I just confirm that the</p> <p>18 audio feed is coming through? Thank you.</p> <p>19 Can Mr Mahmood be sworn, please.</p> <p>20 MR MAZHER MAHMOOD (sworn)</p> <p>21 Questions by MR BARR</p> <p>22 MR BARR: Mr Mahmood, could you give the Inquiry your full</p> <p>23 name, please?</p> <p>24 A. Mazher Mahmood.</p> <p>25 Q. You've provided the Inquiry with two witness statements.</p> <p style="text-align: center;">Page 1</p>	<p>1 Sunday Times and TV-am.</p> <p>2 You tell us that work that you have done has led to</p> <p>3 253 successful criminal prosecutions.</p> <p>4 A. It's incorrect, actually. The total has now gone up to</p> <p>5 261, and as we sit here at the moment, at Southwark</p> <p>6 Crown Court, two more women are being sentenced as</p> <p>7 a result of my work.</p> <p>8 Q. I see, so perhaps we ought to keep a running tally.</p> <p>9 You've won several awards including news reporter of</p> <p>10 the year at the British Press Awards this year and</p> <p>11 reporter of the year in 1999. I think perhaps the most</p> <p>12 high profile of your recent cases has been the case of</p> <p>13 the Pakistani cricketers convicted for match-fixing</p> <p>14 recently?</p> <p>15 A. That's right.</p> <p>16 Q. You tell us at paragraph 31 of your statement -- we</p> <p>17 needn't turn that up -- that your other cases have, for</p> <p>18 example, included the exposure of paedophiles, people</p> <p>19 traffickers, drug dealers, pimps and even a doctor who</p> <p>20 tried to hire you as a hitman?</p> <p>21 A. That's right.</p> <p>22 Q. Can I ask you, before we move any further, about your</p> <p>23 work for the Sunday Times, not now but when you first</p> <p>24 worked for them?</p> <p>25 A. Primarily the same role, investigative journalism.</p> <p style="text-align: center;">Page 3</p>
<p>1 The first was signed on 14 October of this year and the</p> <p>2 second on 8 December. Are you familiar with the</p> <p>3 contents of your witness statements?</p> <p>4 A. Yes, I am.</p> <p>5 Q. Are they true and correct to the best of your knowledge</p> <p>6 and belief?</p> <p>7 A. Yes, they are.</p> <p>8 Q. Thank you. We will take those as read and so I shall</p> <p>9 ask questions only arising from certain parts of your</p> <p>10 statements.</p> <p>11 You tell us that you are currently working as an</p> <p>12 investigative journalist at the Sunday Times?</p> <p>13 A. That's correct.</p> <p>14 Q. That you have over 20 years' experience with -- or about</p> <p>15 20 years' experience with the News of the World before</p> <p>16 that?</p> <p>17 A. That's correct.</p> <p>18 Q. Where you worked also as an investigative journalist,</p> <p>19 exposing, as you put it, criminal and moral wrongdoing?</p> <p>20 A. That's right.</p> <p>21 Q. You have overall been working as a journalist for 30</p> <p>22 years and you list, at paragraph 2 of your witness</p> <p>23 statement, the titles that you've worked for.</p> <p>24 A. Sure.</p> <p>25 Q. The Sunday People, the Daily Mail, the BBC, ITV, the</p> <p style="text-align: center;">Page 2</p>	<p>1 That's what I've done.</p> <p>2 Q. The point I want to put to you is in a book called Fake</p> <p>3 Sheiks & Royal Trappings, Mr Peter Burden suggests that</p> <p>4 you left that employment under something of a cloud?</p> <p>5 A. Well, I'm working there again now. I have to say, I've</p> <p>6 listened to Mr Burden's statement here last week and it</p> <p>7 is riddled with inaccuracies.</p> <p>8 Q. We'll come to some of the cases that he raised and your</p> <p>9 response to them shortly.</p> <p>10 A. Sure.</p> <p>11 Q. But my question at this stage is: is it right that you</p> <p>12 left the Sunday Times under something of a cloud the</p> <p>13 first time around?</p> <p>14 A. We had a disagreement; correct.</p> <p>15 Q. You tell us something of the way in which corporate</p> <p>16 governance worked at the News of the World and the way</p> <p>17 in which your investigations were considered and</p> <p>18 approved. At this stage, I'd like to concentrate very</p> <p>19 much on your time at the News of the World. We'll come</p> <p>20 to your current employment with the Sunday Times in due</p> <p>21 course.</p> <p>22 Concentrating now on the News of the World, can you</p> <p>23 tell us a little bit, first of all, about how much</p> <p>24 information you would need to consider starting</p> <p>25 a full-scale investigation?</p> <p style="text-align: center;">Page 4</p>

<p>1 A. Well, I'd receive information from informants and some 2 were just people who would phone in with a lead, but 3 more often than not, it was informants I'd known for 4 many years who had provided reliable, credible 5 information in the past.</p> <p>6 So first and foremost, I'd have to form the opinion 7 that the information they were providing was credible. 8 I'd have to establish that it was worthy of a story for 9 the News of the World newspaper. I'd have to establish 10 myself that it was in the public interest. I had to 11 establish there was justification for using subterfuge 12 and only then would I present the story to the news 13 desk, who would then go through the same process and ask 14 me loads and questions and at the next stage, the 15 lawyers would get involved, whether or not the modus 16 operandi was justified and then often the approval of 17 the editor was required and only then would I embark on 18 any investigation. So it was quite a thorough process.</p> <p>19 Q. If I could just explore some of that in a little more 20 detail. At the News of the World, was this a process 21 that was largely done orally or was it committed to 22 writing?</p> <p>23 A. Some of it was committed to writing. I'd always submit 24 my initial proposal by email and provide in that email 25 justifications for why I felt this story was in the</p> <p style="text-align: center;">Page 5</p>	<p>1 I wanted. I had to take legal advice and throughout the 2 investigation I remained in constant touch with our 3 lawyers.</p> <p>4 Q. On the question of process, can I ask you to compare the 5 processes that were in place and which you have just 6 described at the News of the World with those which are 7 in place at the Sunday Times? Are there differences?</p> <p>8 A. Essentially they're the same, but at the Sunday Times 9 it's a lot more stringent and it's more formalised.</p> <p>10 I can give you an example, if you wish, of an 11 investigation I did recently. I received information 12 that a gang were involved in insurance fraud. They were 13 staging car crashes, an accident claims firm.</p> <p>14 So the first thing I did was to speak to the 15 informant who I'd known for many years. He's provided 16 reliable information in the past. I knew his 17 background, I knew that the information was credible. 18 The first stage is that I assessed it and felt it 19 justified -- satisfied the test of public interest, 20 satisfied the test for use of subterfuge. I then 21 prepared a memo which I sent to the news desk, so that 22 was then vetted by Steve Bowan(?), the news editor, and 23 James Mellor, the deputy news editor. They then asked 24 various questions and approved it. It then went to the 25 head of news, Charles Hymas, who then rang me up and</p> <p style="text-align: center;">Page 7</p>
<p>1 public interest and why I felt the use of subterfuge was 2 justified, and I assume that would also go on to our 3 lawyers. That would be forwarded to them for their 4 approval.</p> <p>5 Q. Can you give us --</p> <p>6 A. But much of the conversation was oral.</p> <p>7 Q. I see. Can you give us some indication of the 8 proportion of your investigations that involved the 9 editor taking a view on whether or not you should 10 proceed?</p> <p>11 A. Ultimately, the editor made a decision on nearly all the 12 stories, but he was hands-on on obviously the more high 13 profile ones. But the run-of-the-mill stories I'd 14 liaise with the news desk.</p> <p>15 Q. We'll come in a little more detail later on to the 16 public interest tests and the question of the ends 17 justified the means. At this stage, I'm just interested 18 in the process.</p> <p>19 You talk about logistics and costings being 20 considered and approved before you proceeded to 21 investigate. Was there also consideration of the 22 specific methods that you were going to use or was that 23 left to you and your experience?</p> <p>24 A. No, they were discussed -- everything was discussed with 25 the legal team. I couldn't go off piste and do what</p> <p style="text-align: center;">Page 6</p>	<p>1 gave me a grilling on sources and the modus operandi, 2 and then it went to the editor, and I was invited to 3 a meeting where -- it was attended by John Witherow, the 4 editor, went through it. Pia Sarma(?), our legal 5 director, was present. Charles Hymas was present and 6 there was a formal meeting where every aspect of the 7 story was discussed, minutes were kept of the meeting, 8 notes were taken, a very rigorous process. You know, is 9 the use of subterfuge justified in this case? Is there 10 a public interest argument? There's a formal debate.</p> <p>11 That's happened for every single investigation that 12 I've done at the Sunday Times. So there's no question 13 of it not being regulated. It's a very, very formal 14 procedure and a very thorough procedure.</p> <p>15 Q. Is it your evidence that that thorough, formal procedure 16 was more than took place at the News of the World?</p> <p>17 A. Yes, it is. It was a lot more informal at the 18 News of the World newspaper, but -- in essence, we still 19 had to satisfy the same criteria, but it was a lot less 20 formal, chats with the news desk. You know, there were 21 no meetings. It was a lot more informal.</p> <p>22 Q. Was that informality a cultural thing that connected 23 with the News of the World as a newspaper?</p> <p>24 A. I think it was, yes, it was a cultural thing. But 25 having said that, as I say, I remained in constant touch</p> <p style="text-align: center;">Page 8</p>

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<p>1 with Tom Crone, the lawyer. There were times when 2 I rang him 2, 3 in the morning for advice. You know, 3 can I say this, do this, do that? So it's not that it 4 was not regulated. It was, but there were no formal 5 meetings, there was no kind of open discussions about 6 the matters I've just outlined.</p> <p>7 Q. I understand. You say at paragraph 10 of your first 8 witness statement that there might be instances when you 9 were told by the news editor or the editor to look at 10 a particular individual for wrongdoing. So is it right 11 that your stories sometimes started with leads which you 12 obtained, but on other occasions you were fed leads by 13 the editorial hierarchy?</p> <p>14 A. 95 per cent of all the stories I did, I'd say, were my 15 own stories from my own sources, but there were 16 occasions when I was given stories by the news desk or 17 directly by the editor who had received information and 18 felt it formed the basis of an investigation for me.</p> <p>19 Q. And if the editor wanted a particular matter 20 investigated, did that mean that some of the process 21 that you described earlier was avoided and you would 22 just automatically investigate, or was there an analysis 23 of the strength of the information that you were being 24 provided by the editor?</p> <p>25 A. No, there was always analysis, always. I mean, the Page 9</p>	<p>1 Q. Can I now delve into a little bit more detail about the 2 sorts of cases that you were investigating? You 3 provided some exhibits of very recent stories -- and 4 you've just mentioned one of them -- whilst you've been 5 at the Sunday Times. If I may say, so they all seem to 6 be cases where there is a clear public interest and 7 we've mentioned some of the stories you did earlier in 8 your career, which again seem to be clearly in the 9 public interest.</p> <p>10 I'd like to perhaps ask a little bit about some of 11 the choices which have been a little bit more 12 controversial.</p> <p>13 A. Right.</p> <p>14 Q. First of all, in terms of choice of subject, it's right, 15 isn't it, that a lot of your stories have been about 16 public figures and they have on some occasions included 17 celebrities?</p> <p>18 A. I wrote more than 500 stories for the News of the World 19 newspaper. Of those, a very, very small fraction 20 involved celebrities. Very small fraction.</p> <p>21 Q. Understanding your evidence that it was a small 22 fraction, can I now ask you about what sort of thing did 23 you consider would make a celebrity story a matter of 24 public interest?</p> <p>25 A. Clearly criminality was the main factor. Are they Page 11</p>
<p>1 editor would not give me a story that he'd not 2 considered these factors.</p> <p>3 LORD JUSTICE LEVESON: Sorry, how do you know that? Is that 4 because you were party to those discussions?</p> <p>5 A. I was occasionally party to the discussions. I'd have 6 a meeting with the editor and he would say, "Look, 7 I think we should go undercover on this one. I have 8 reasonable belief that this person's involved in this 9 particular crime. I have a reliable source." So we'd 10 go through the same process.</p> <p>11 LORD JUSTICE LEVESON: You say you were occasionally party 12 to such discussions, but if you weren't, then you 13 presumably just accepted what was provided for you?</p> <p>14 A. Correct, correct.</p> <p>15 MR BARR: Can you recall any occasion when you were provided 16 with a lead by an editor and you found yourself turning 17 around to him and saying, "No, I'm sorry, this is not 18 enough to go on"?</p> <p>19 A. No, but I mean, there would always be discussion about 20 the source. You know, can I speak to the source? How 21 reliable is the information? There was always that 22 discussion. It wasn't glossed over just because it's 23 come from the editor. There was always a discussion, if 24 not directly with the editor, then certainly with the 25 news desk.</p> Page 10	<p>1 involved in criminality? Are they involved in moral 2 wrongdoing? Are they involved in hypocrisy? Those were 3 the factors. I mean, the parameters were set very 4 clearly by the PCC code that we adhere to very strongly 5 at the News of the World.</p> <p>6 Q. So just to look at those, you mentioned three things. 7 Illegality, I think, speaks for itself.</p> <p>8 A. Sure.</p> <p>9 Q. We need not consider that any further. Hypocrisy, 10 similarly. Can we focus on the moral wrongdoing? Was 11 it your view that any form of moral wrongdoing was 12 sufficient to pass the public interest test and 13 investigate a celebrity or was there a boundary line 14 somewhere?</p> <p>15 A. Each case was on its own merits. I mean, if you had 16 a member of Parliament who was cheating on his wife with 17 a mistress, then clearly on moral grounds, you know, 18 I felt that was justified. Each one was assessed -- 19 each story was assessed on its own merits. But we had 20 to be satisfied that it met the public interest 21 argument.</p> <p>22 Q. I'd like to ask you about two cases which are mentioned 23 in your own autobiographical book. They are both 24 concerning supermodels and they both concern both drugs 25 and allegations of prostitution. One is the supermodel Page 12</p>

<p>1 Sophie Anderton and the other is a woman who is named 2 only in your book at X. 3 A. Right. 4 Q. If we deal with the drugs side of things first, what was 5 your view in terms of a supermodel taking drugs? Why 6 was that a matter of public interest, in your opinion? 7 A. Not taking drugs. She was selling drugs. She was 8 working as a prostitute and selling drugs to clients. 9 Clear case of criminality. The same applies for the 10 Ms X. The information that we received was that she too 11 was involved in supplying drugs. We spent a fortune on 12 that story and she did not supply us with drugs. The 13 story never made the paper. 14 Q. Moving on from the drugs to the prostitution, in both 15 cases it involved offering the woman concerned 16 a considerable sum of money to see if she would agree to 17 supply sex in return. In the first case, 18 Sophie Anderton, I think the figure was £10,000 and in 19 the case of X, it was \$60,000 for six hours. 20 A. Sorry, I think your assertion is wrong there. It's not 21 us offering her the money. They were working with 22 escort agencies. That was their price. They were 23 demanding that figure. It's not us offering the money. 24 It's them demanding that figure, which I think is a very 25 important distinction to make. It's not as if we lured Page 13</p>	<p>1 So in a sense, they're abusing that position. 2 LORD JUSTICE LEVESON: So you say if somebody's famous, that 3 means anything goes? 4 A. That's what they believe. 5 LORD JUSTICE LEVESON: No, that's what you believe. If 6 they're famous, anything goes? 7 A. No, that is a position that they take, that -- people 8 like Sophie Anderton feel that they are above the law, 9 they're immune from prosecution and quite frankly, if 10 I'd not exposed her, there is absolutely no way that 11 she'd have been caught dealing drugs. 12 LORD JUSTICE LEVESON: No, I'm sorry, it's a slightly 13 different point that I was asking you. You were saying 14 if it's just prostitution, it's a close call, but it's 15 moral grounds, these people are role models. So do 16 I gather from what you're saying that if people are 17 famous, any conflict between what you perceive is their 18 public persona and what is the public persona is worth 19 investigating? 20 A. Absolutely. If it's hypocrisy, then very much. If they 21 present themselves as wholesome characters and trade on 22 that status, then privately betray that, then I think 23 that's totally justified. 24 LORD JUSTICE LEVESON: So they have to trade on being 25 wholesome characters? Page 15</p>
<p>1 them into prostitution or lured them into a hotel room. 2 It's a common misconception. We do not engage in 3 entrapment of that sort. They were working as 4 prostitutes with an escort agency. They had their set 5 fees. 6 Q. I see. What was it about the fact that they were 7 offering sex in return for money that you thought made 8 it a matter of legitimate public interest, not just to 9 expose an agency but to expose the woman herself? 10 A. Well, as I said to you, the primary focus of both those 11 stories was illegality. They were dealing drugs to 12 clients. I mean, sure, the only way to infiltrate them 13 was to pose as a client and then the offer would be made 14 to us. So that was the main focus of that story. 15 I mean, the morality of them being a prostitute was not 16 the main focus for those stories. The justification was 17 criminality. 18 Q. Are you saying that if it had been just prostitution, 19 you would not have pursued the story? 20 A. Then it would have been a call. Sure, then it would be 21 a close call. I mean, Ms X was a married within woman, 22 so she was cheating on her husband. Let's not forget, 23 these people are, sadly, role models for our kids. 24 A lot of children aspire to be models, to have the fame 25 and fortune and the privileges afforded by that fame. Page 14</p>	<p>1 A. Sure, but as I say, in both these stories you've 2 mentioned, the justification was criminality. If 3 they're posing in Hello magazine, happy family snaps, 4 yet secretly working as prostitutes, I think there's -- 5 the moral justification for exposing them is quite 6 clear, in my view. 7 MR BARR: I'd like to ask you now about whether or not 8 there's a difference between what is in the public 9 interest and what interests the public. In your mind, 10 is there a difference or not? 11 A. Of course there is. I mean, the public are very 12 interested in gossip and tittle-tattle and showbiz 13 stuff, but for me, as I said, the premise is very, very 14 clear. Public interest is, for me, moral wrongdoing, 15 obviously criminal acts, hypocrisy, with the public 16 being deceived, all aspects that are encompassed by the 17 PCC code. 18 Q. When you were discussing with your subeditors and 19 editors whether or not to pursue an investigation, was 20 the interest of the story to the readership a factor 21 that was taken into account? 22 A. I mean, there was a lot of tension at the 23 News of the World. We were always being criticised, so 24 we were extra cautious to comply with the PCC code. The 25 emphasis was always, you know: does this pass the public Page 16</p>

<p>1 interest test? Is there justification for using 2 subterfuge? Is there any other way that we could obtain 3 the same information without using subterfuge? Those 4 were the primary factors.</p> <p>5 Q. I understand that answer, but it doesn't quite respond 6 to the question that I put, which is: when you were 7 discussing stories and whether to proceed or not, was 8 the interest of the story to the public ever a factor 9 that was --</p> <p>10 A. It wasn't discussed. As I say, that was never a factor. 11 The public would love to hear about this was never -- it 12 was never put in those terms.</p> <p>13 Q. Can I ask you about the PCC for a moment, please? 14 You've explained how you've often had to respond to 15 complaints and that you put a lot of effort into doing 16 so. In fact, you've even described being taken off 17 investigations in order to respond to complaints.</p> <p>18 A. That's right.</p> <p>19 Q. The Inquiry has heard evidence of at least some 20 journalists taking a far less serious attitude towards 21 the PCC and putting particular emphasis on the fact that 22 the PCC isn't, for example, able to impose a fine. But 23 was the attitude that you describe in your statement to 24 the PCC unusual at the News of the World?</p> <p>25 A. I can only speak for my own work. I mean, whenever</p> <p style="text-align: center;">Page 17</p>	<p>1 reporters on the paper. I had my own little team that 2 I worked with and we certainly took it very seriously, 3 but I didn't have a lot of interaction with other 4 reporters on the paper.</p> <p>5 Q. It's right, according to Mr McMullan, who gave evidence 6 here recently, that he worked for a time with you; is 7 that right?</p> <p>8 A. Again, this was -- this came as news to me. I may have 9 seen him in the office. I've never worked with the 10 chap. I can't even recall talking to him. Completely 11 untrue. He's never worked with me on a single 12 investigation. As I say, I don't know him.</p> <p>13 Q. Can I move now to the question of private investigators, 14 please? You explain in your statement that there was 15 a time early on in your career with the 16 News of the World when you did use private investigators 17 and your statement sets out the way in which they were 18 used. Can I ask you now, though, whether you can recall 19 ever working with Mr Derek Webb?</p> <p>20 A. On private investigators -- can I just stress very 21 clearly that I never ever commissioned a private 22 detective to do any work for me. I never paid a private 23 detective, contrary to the report in this morning's 24 Independent. It's simply not true.</p> <p>25 Derek Webb is a man that I came across I think on</p> <p style="text-align: center;">Page 19</p>
<p>1 a complaint came in to the PCC, it was treated very 2 seriously. As I've explained, it required a lot of 3 effort, and in 20 years, I didn't have a single PCC 4 complaint upheld against me. Numerous came in and it 5 was quite a laborious task answering PCC complaints but 6 we did. It was a priority. That was my experience.</p> <p>7 As I said, even though the paper is now closed, 8 there are currently two complaints pending, and I've 9 spent hours doing transcripts and answering those 10 complaints, even though no sanctions can now obviously 11 be imposed. So it shows how seriously we take the PCC 12 code.</p> <p>13 LORD JUSTICE LEVESON: We or I?</p> <p>14 A. I. And the paper. As I say, I was pulled off 15 investigations, which was quite annoying actually. 16 I was working on an investigation, and they'd say, "No, 17 sorry, you have to reply to this PCC complaint, get that 18 out of the way first and then go out on the road." So 19 it's not just myself. It was the lawyers to the paper 20 to the editor.</p> <p>21 MR BARR: You described the lawyer and the editor taking the 22 matter seriously. Can I ask you about the attitude of 23 your colleagues, your fellow reporters? What was the 24 feeling amongst your colleagues?</p> <p>25 A. I didn't have a great deal of dealings with other</p> <p style="text-align: center;">Page 18</p>	<p>1 one or two occasions. He may have worked on one or two 2 of my investigations, and again, he was assigned to my 3 stories by the news desk. I can't remember what stories 4 they were but I think only on a couple of occasions.</p> <p>5 Q. Can I now move to the question of chequebook journalism? 6 I've put to you a moment ago examples where really very 7 considerable sums of money were in play on the 8 supermodel investigations that you did. What was your 9 approach on the News of the World to the use of 10 payments, first of all to sources?</p> <p>11 A. Well, to sources, obviously people came to us because 12 they wanted to sell stories and we made no bones about 13 the fact that we paid for stories. We advertised it. 14 I don't think there's anything wrong with that, as long 15 as the individuals are not profiting from their crimes 16 by doing so. I mean, if they were whistle-blowing and 17 helping us expose drug rings and paedophile rings and 18 expecting a fee for that, then I see nothing wrong with 19 that.</p> <p>20 Q. Is there a difficulty that if you offer money and you 21 advertise for stories, that it's going to tempt people 22 to embellish or, even worse, simply to fabricate?</p> <p>23 A. Sure. That's what we're here for. It is our job to 24 assess the credibility of the information we receive. 25 Nothing would get in the paper unless its were</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 thoroughly checked and went through our lawyers. That</p> <p>2 is our role, to check the information.</p> <p>3 Q. We've again heard evidence of an investigative</p> <p>4 journalist who, with his colleagues, presented stories</p> <p>5 to tabloid newspapers which had these lines open for</p> <p>6 people to come forward with stories and it seemed from</p> <p>7 the evidence he adduced that getting the stories</p> <p>8 published, even when they were fictitious, was very easy</p> <p>9 indeed. Can I ask you, what checks did you apply when</p> <p>10 you received a lead?</p> <p>11 A. That certainly isn't my experience, not at all. I mean,</p> <p>12 we'd end up paying heavy fees if we got it wrong. As</p> <p>13 I've said, the majority of my stories came from</p> <p>14 informants who provided me credible information in the</p> <p>15 past but we'd make every check that we could before</p> <p>16 embarking on investigation and I have to tell you that</p> <p>17 a lot of the investigations are quite expensive, they</p> <p>18 involve quite an investment, so we have to be sure</p> <p>19 ourselves that the information sounds credible. So</p> <p>20 depending on obviously what the story was, we'd try and</p> <p>21 make as many checks prior to embarking on the</p> <p>22 investigation. We'd have to have a belief that the</p> <p>23 information was genuine and if it wasn't, we'd soon find</p> <p>24 out.</p> <p>25 Q. Are you saying that because of the nature of the sort of</p> <p style="text-align: center;">Page 21</p>	<p>1 LORD JUSTICE LEVESON: Very good.</p> <p>2 A. It's certainly not my experience.</p> <p>3 MR BARR: You explain at paragraph 29 of your witness</p> <p>4 statement that in your experience there were very few</p> <p>5 formal contracts between the person coming forward to</p> <p>6 the newspaper and the newspaper for money to be paid and</p> <p>7 that it was largely done on trust.</p> <p>8 A. Again, this is based on my experience with my contacts</p> <p>9 and my informants.</p> <p>10 Q. The Inquiry has heard some evidence of bargains being</p> <p>11 made on trust and then not being honoured by newspapers.</p> <p>12 Were there any circumstances in which you would not pay</p> <p>13 a source, having promised money?</p> <p>14 A. No, not in my experience. Again, you know, as a result</p> <p>15 of my investigations, obviously I have criminals after</p> <p>16 me, people I have exposed. The last thing I want is my</p> <p>17 informant being disgruntled as well. So I'd make sure</p> <p>18 they were paid what we'd agreed to pay them.</p> <p>19 Q. Is it your evidence that that was invariably the</p> <p>20 practice?</p> <p>21 A. That was -- that's right.</p> <p>22 Q. I'm not going to ask you any detailed questions about</p> <p>23 phone hacking, but could I just ask you this -- and when</p> <p>24 you answer, please don't name any names: were you aware</p> <p>25 that phone hacking was going on at any time during your</p> <p style="text-align: center;">Page 23</p>
<p>1 investigations that you got involved in, there might</p> <p>2 have been a difference between your experience and that</p> <p>3 of your colleagues doing other work on the</p> <p>4 News of the World?</p> <p>5 A. Perhaps, but I don't believe that fabricated stories</p> <p>6 could get into the paper.</p> <p>7 LORD JUSTICE LEVESON: You don't believe that?</p> <p>8 A. I don't believe that as a matter of course, people could</p> <p>9 phone in with fabricated stories and they would end up</p> <p>10 in the paper. There were stringent checks in place.</p> <p>11 LORD JUSTICE LEVESON: Did you happen to see the film</p> <p>12 Starseekers(sic)?</p> <p>13 A. No, I've not seen that.</p> <p>14 LORD JUSTICE LEVESON: The evidence that we heard last week?</p> <p>15 A. No, I didn't see that.</p> <p>16 LORD JUSTICE LEVESON: Mr Atkins?</p> <p>17 A. No, I didn't see that, I'm sorry.</p> <p>18 LORD JUSTICE LEVESON: You've never heard about this work</p> <p>19 that was done whereby he placed false stories in</p> <p>20 newspapers?</p> <p>21 A. I didn't see that. No, I didn't, no.</p> <p>22 LORD JUSTICE LEVESON: It's some time ago. I would have</p> <p>23 thought that it would be something that all those</p> <p>24 involved in journalism would have been fascinated by.</p> <p>25 A. No, I didn't see it. I'm sorry.</p> <p style="text-align: center;">Page 22</p>	<p>1 work with the News of the World?</p> <p>2 A. No, I was not. As I said in my statement, the first</p> <p>3 time I heard about it was following an arrest.</p> <p>4 Q. Was that the arrest of Clive Goodman?</p> <p>5 A. Correct.</p> <p>6 Q. After Clive Goodman was arrested, did it become the talk</p> <p>7 of the office?</p> <p>8 A. Of course.</p> <p>9 Q. And at that point, did you hear anything about whether</p> <p>10 anybody else -- and again no names, please -- had been</p> <p>11 involved?</p> <p>12 A. No, but I mean all the fingers were pointed towards the</p> <p>13 news desk.</p> <p>14 Q. And at any time between Mr Goodman's arrest and</p> <p>15 conviction until the close of the News of the World, did</p> <p>16 you hear from anyone within the News of the World that</p> <p>17 anybody else apart from Clive Goodman had been hacking</p> <p>18 mobile phones?</p> <p>19 A. No. I mean, clearly rumours were about, of course, but</p> <p>20 there was no firm evidence.</p> <p>21 Q. Mr Mahmood, can we move now to your second statement?</p> <p>22 Again, I'm going to deal with it only by picking up</p> <p>23 certain matters you raised. The rest is formally in</p> <p>24 evidence and can be read by others.</p> <p>25 Can I ask you first of all about the case of the</p> <p style="text-align: center;">Page 24</p>

<p>1 Crown v Shannon? This involved a man who I think was 2 a television actor and you had done an investigation 3 which led to him being convicted of a drugs offence. 4 A. That's right. 5 Q. And you exhibit the judgment of the Court of Appeal. 6 For the technician, it's tab 5. Then if we could have 7 the first page of the judgment on the screen, please. 8 If we could have the paragraph which starts with the 9 word "held" up in the centre, please. We see here, in 10 summary form, the way in which the court decided 11 Mr Shannon's appeal against conviction. I'm interested 12 in the passage which starts about halfway down, once 13 it's come into focus -- thank you -- at paragraph E. It 14 says: 15 "... there was no general rule requiring a court on 16 grounds of fundamental fairness not to entertain 17 a prosecution at all in cases of incitement or 18 instigation by an agent provocateur, regardless of 19 whether the trial as a whole could be a fair one in the 20 procedural sense; that the judge found correctly that 21 the evidence fell short of establishing actual 22 incitement or instigation of the offences concerned and 23 that in any event, the admission of the evidence would 24 not have an adverse effect on the procedural fairness of 25 the trial." <p style="text-align: center;">Page 25</p></p>	<p>1 Mohammed al Kareem justified his representing himself as 2 a sheik moving in royal circles by saying: "The only way 3 to get into [the defendant's] circle is to pose as 4 somebody who he would want to come out and meet and want 5 to relax with. Get him to feel, if anything, we are 6 above him and he will be himself." 7 So it's right, isn't it, that effectively what was 8 being dangled in front of him was the prospect of a very 9 lucrative and attractive trip to Dubai? 10 A. Sure, but again, can I make very clear that we were 11 acting on reliable information. We knew that Mr Shannon 12 was actively involved in dealing drugs, so we acted on 13 that information, and yes, this was the only way to get 14 him to -- of course we provided the environment for him 15 to commit the crime, a crime that he was predisposed to 16 committing. 17 Q. My question is this: accepting, as the judges found, 18 that this was not a case of instigation or incitement, 19 what it is, though, is a question where a very 20 considerable carrot was dangled in front of the target? 21 A. Well, if you think that opening a nightclub in Dubai and 22 being a celebrity attending that function is 23 a considerable carrot, then so be it. But once again, 24 as I say, if I dangle a big carrot in front of you, 25 would you be able to supply me with cocaine or a fake <p style="text-align: center;">Page 27</p></p>
<p>1 So is the point of exhibiting this case to point out 2 that a court held that you and your team had not in fact 3 incited or instigated an offence at all? 4 A. Absolutely. Besides this, he then went to the European 5 Court, went to Strasbourg, where once again the judges 6 there ruled that there was no entrapment. It's quite 7 annoying, this myth of entrapment. We do not entrap 8 people. Frankly, I don't believe you can entrap people 9 in the manner they suggest. 10 Q. I see. In the same case, could we now have up on the 11 screen page 54, please? It's the top of the page that 12 I would like to have brought up. Thank you. 13 Here I want to concentrate on essentially the 14 flavour of what it was that you did in order to execute 15 the sting. Starting from the second line, it reads: 16 "He said that because his (Mahmood's) name was 17 well-known in showbusiness circles, he decided that it 18 was necessary to set up an operation in which he posed 19 as a sheik, invited the defendant to the Savoy Hotel, 20 collecting him in a Rolls Royce and giving him dinner in 21 the River Restaurant, all on the basis of a fictitious 22 offer and intention to invite him out to Dubai as 23 a celebrity to participate in the opening of a nightclub 24 out there. Mahmood, who had booked a suite at the Savoy 25 in the name of His Royal Highness Sheik <p style="text-align: center;">Page 26</p></p>	<p>1 passport or a firearm? You would not, and even if you 2 wanted to, you wouldn't know where to begin, you 3 wouldn't know where to go. These are people that are 4 pre-disposed to commit these crimes anyway, and all I'm 5 providing is a snapshot of what they're doing anyway. 6 Q. In fairness to you, it's right that you point out very 7 often that ordinary law-abiding people wouldn't know 8 where to start with supplying drugs, for example, or 9 whatever you are investigating, but my question is this: 10 from an ethical point of view, did you think that there 11 was any ethical limit as to the size of the carrot that 12 you could dangle in front of a target to tempt them into 13 committing a criminal offence? 14 A. Well, as I said, just being a -- making a personal 15 appearance at the opening of a nightclub is not a huge 16 carrot to dangle. 17 Q. If we move from the specific to the general, to the 18 theoretical, then: is there a point at which you would 19 think: "That's too big a carrot, it's just not fair or 20 ethical to offer this person such a big incentive to 21 commit a criminal offence"? 22 A. This was one of the earlier investigations. I think 23 1993, was it? It was one of the early investigations we 24 did. As time went on, we did refine our modus operandi, 25 and of course it was a consideration. I mean, our <p style="text-align: center;">Page 28</p></p>

<p>1 lawyers would be very careful in determining our 2 methods. They would scrutinise us very carefully. Yes, 3 it was a considerable. 4 Q. So if it was a consideration -- I'm trying here to tease 5 out, in the mind of a very experienced investigator, 6 where the ethical lines are. So where is the ethical 7 line, in your view, about the size of the carrot? 8 A. As I've said to you repeatedly, no matter what the size 9 of the carrot, you cannot entrap people into committing 10 these crimes. However, the public perception is that 11 because they've offered a huge carrot, that has resulted 12 in the crime taking place. 13 LORD JUSTICE LEVESON: I'm not sure about that. Let's just 14 test it. Assume you get somebody who himself takes 15 illegal drugs. So they are guilty of possession of 16 drugs, so they do know where they can get hold of drugs. 17 And you provide a picture or paint a story which makes 18 it extremely attractive for them to go to the next 19 step -- 20 A. No, that is not the case. I mean, first of all -- 21 LORD JUSTICE LEVESON: But that's the question you're being 22 asked. 23 A. No, that's not the case at all. 24 LORD JUSTICE LEVESON: But that's because of the reliability 25 of your information?</p> <p style="text-align: center;">Page 29</p>	<p>1 I'm interested in the passage which starts at (c). 2 This is where the court is dealing with one of the 3 points raised by the defendant: 4 "It was suggested that this might have given 5 employees of the News of the World grudge motives rather 6 than a motive simply to expose criminal activity on the 7 part of the defendant. In this respect, the defence 8 relied inter alia on passages from the video prior to 9 the defendant's entry onto the scene which were said to 10 demonstrate animosity towards the defendant, in 11 particular a reference by Mr Mahmood to the defendant as 12 a 'toerag', coupled with laughter at the prospect that 13 'if He supplies, his career is over", and, "He could get 14 banged up tomorrow". 15 I'm not interested in whether or not there was 16 a grudge motive. You can put that out of your mind. 17 What I'm interested in is the way in which you desirable 18 Mr Shannon and the prospect of ending his career. Is it 19 right that you regarded him as a "toerag"? 20 A. That's right, because -- let's not forget I was acting 21 on information. I don't want to use the privacy of this 22 room to disclose the informant, but the way he treated 23 the informant was particularly despicable and, as I say, 24 he was regularly dealing cocaine. He had scales. He 25 was measuring cocaine up and dealing cocaine. So this</p> <p style="text-align: center;">Page 31</p>
<p>1 A. The reliability of the information and we do not dangle 2 huge carrots. 3 LORD JUSTICE LEVESON: Then it's a question of what's a huge 4 carrot. 5 A. Exactly, and I don't want to go into modus operandi 6 because I -- 7 LORD JUSTICE LEVESON: I understand that and I'm not trying 8 to, but I'm trying to test the proposition, because I'm 9 sure you would agree that somebody who did use drugs, 10 who was given a large carrot, might very well go the 11 extra stage to then supply rather than simply possess. 12 Of course, supplying drugs, I don't need to be told, is 13 a very, very much more serious offence. 14 A. Sure, I understand that. But I have to say that our 15 methods have been tested time and time again in the 16 courts. 17 LORD JUSTICE LEVESON: Oh, it wouldn't necessarily provide 18 a defence. 19 A. Sure. 20 LORD JUSTICE LEVESON: I'm not suggesting it would. It's 21 a question of what the ethical limits are for you, not 22 what the legal limits are for the criminal law. 23 A. Sure. No, it's something we are conscious of. 24 MR BARR: Can I ask you to turn to page 58 of the judgment. 25 If we could have that up on the screen, please.</p> <p style="text-align: center;">Page 30</p>	<p>1 was in relation to his treatment of the informant. 2 LORD JUSTICE LEVESON: Was that adduced in evidence in the 3 court? 4 A. I think it was mentioned in court. 5 LORD JUSTICE LEVESON: That he had scales? 6 A. I think it was mentioned in court. I'm not sure, but 7 I think it was mentioned. 8 MR BARR: There seems to be a certain amount of relish in 9 the phrase "coupled with laughter at the prospect that 10 if he supplies, his career is over". Are you, when you 11 conduct these investigations, looking forward to the 12 prospect of the target actually committing the offence 13 which you're approaching him about? 14 A. Not at all, no. I think there have been instances where 15 we've exposed celebrities, Johnny Walker being one of 16 them, who have thanked me for exposing them. This was 17 a celebrity who I received information was involved in 18 drug taking and supplying drugs to his colleagues. He 19 turned up at a hotel room with a bag of cocaine in his 20 pocket. I subsequently exposed him, he pleaded guilty 21 and then thanked me for helping him resolve the demons 22 that were possessing him at the time. He was grateful 23 for my intervention. 24 Q. So what is it that motivates you, then? 25 A. Well, it is the public duty. I mean, there have been</p> <p style="text-align: center;">Page 32</p>

<p>1 cases where we've embarked on investigations that have 2 not even been for the newspaper. I mean, last month 3 there's a man called John Batty(?) who was jailed. He 4 pleaded guilty to sexually abusing a child who I think 5 was about 11 or 12 at the time. Again, this was never 6 going to be a story for the paper. The young girl rang 7 me up and told me what had happened to her and could 8 I assist? She said, "If I go to the police, there's no 9 evidence. Will you be able to help?" Myself and 10 a colleague helped to gather the evidence, it went to 11 court and at Chelmsford Crown Court he pleaded guilty. 12 We risk our lives on a daily basis. You know, 13 I live under the shadow of death threats. The 14 motivation is very clear. Yes, exposing criminality 15 gives me great satisfaction and I'm proud to have jailed 16 paedophiles and arms dealers and drug dealers and the 17 likes. That's my motivation. 18 Q. I see. We may return to that topic in a little while. 19 Can we move on to the next case that you've drawn to our 20 attention in tab 6. We don't need anything on the 21 screen just yet. It's a case of the Crown v Hardwicke 22 and Thwaites. This was another drugs sting which led to 23 the conviction of two people. 24 Now, A feature of this case was that the jury said 25 that had they been allowed to take what described as the Page 33</p>	<p>1 acts of these particular journalists on the 2nd and 2 3 September 1998, and set those against the offences 3 with which the defendants are in consequence charged 4 before this court, I readily conclude, borrowing and 5 adapting the words of Lord Steyn in the case of 6 R v Latif once more, the conduct of Mr Mahmood and his 7 colleagues was not so unworthy or shameful that it would 8 be an affront to the public conscience to allow the 9 prosecution to proceed. Realistically, any criminal 10 behaviour, if any has been established, by these 11 journalists was venial compared to that of the 12 defendants." 13 That takes me to the question of whether there are 14 circumstances where you consider it is ethical to break 15 the law in order to get a story in the public interest. 16 What do you say to that proposition? 17 A. Yes, there are. There certainly are. The public 18 interest is the overriding factor. I've purchased child 19 pornography, for example, which clearly is an illegal 20 act, and that led to a conviction. So yes, there are 21 times when we do cross the line, but the overriding 22 factor is the public interest. I've never been 23 prosecuted so for drugs or offences relating to work 24 that I've done. 25 Q. I'm not suggesting that it's wrong to do that. What Page 35</p>
<p>1 extreme provocation into account, they would undoubtedly 2 have reached a different verdict. I understand from 3 your second witness statement that the point you would 4 like to make is that the jury didn't have the full facts 5 before them because certain matters had been withheld 6 from evidence; is that right? 7 A. That's right. The jury were not allowed to see the 8 entire video in which they were confessing to previous 9 crimes and extensive drug dealing in the past. I'm sure 10 that had the jury seen those elements, they would have 11 reached a different conclusion. 12 However, they did appeal the sentence, which was 13 upheld. 14 Q. This decision also had some other interesting passages 15 in it that we might look at. Could we have up on the 16 screen, please, paragraph 27. I'm afraid there aren't 17 page numbers. We have, at paragraph 27, the court 18 dealing with arguments about your behaviour and that of 19 your colleagues and whether or not it was illegal. If 20 we look at the quotation, it says: 21 "The way in which such investigations are pursued, 22 albeit they may rightly or wrongly be described by some 23 as distasteful, is not, in my view, judicially to be 24 condemned where it is not unlawful. Thus, when 25 I examine the facts of this case and, in particular, the Page 34</p>	<p>1 I want to explore with you is where do you draw the 2 line? Because this goes straight into the question of: 3 when does the end justify the means? Where do you draw 4 the line? 5 A. Certainly in the example I've just given you, buying 6 child pornography, clearly the end justifies the 7 meaning. Clearly. And exposing drug dealers. If we 8 buy drugs, we expose drug dealers and that's our 9 intention. Clearly the end justifies the means. Does 10 that mean we'd go out and rob a bank to show that banks 11 could be robbed? No, we would not. 12 Q. You're coming on to what I was just going to ask you. 13 At what point is it unacceptable? We had a witness 14 earlier who gave the very extreme example that you 15 wouldn't murder someone to get a story in the paper. 16 LORD JUSTICE LEVESON: More particularly, he wouldn't murder 17 a High Court judge, to be fair. 18 MR BARR: You wouldn't rob a bank to get a story. Can you 19 think of an example, from all your years of experience, 20 of something which was right on the line? What are the 21 sorts of decisions that made you sweat? 22 A. I can't think of an example. I think I'm perfectly 23 happy with all the 500 investigations that I've done, 24 all 500 of them. They fulfil the criteria, in my view, 25 that they satisfied the public interest. Page 36</p>

<p>1 Q. The final point I'd like to deal with from this judgment 2 is at paragraph 31, please. Here we're coming back to 3 the question of what your motives are. If I pick up at 4 paragraph 31, the second sentence: 5 "The decision as to publication [and this was 6 a story that was published just before the police, 7 I think, made arrests] did have some significance 8 because it showed beyond argument what were the real 9 priorities so far as the journalists and the newspaper 10 were concerned. When the time had clearly come for the 11 police to be informed, but if that step were taken the 12 newspaper was likely to be unable to publish its story, 13 it was the needs of the newspaper rather than the 14 interests of justice which were regarded as paramount. 15 But the judge's refusal to consider the priorities of 16 the investigators was of no great significance because, 17 as we have already said, he gave full weight to what the 18 journalists in fact did." 19 So there we have the Court of Appeal finding that 20 your real priorities were as a journalist, wanting to 21 publish a story. Was that a fair finding you would 22 accept? 23 A. Very much so. I mean, I'm a journalist. That's what we 24 do. We publish stories, we sell newspapers. That's 25 what we do. But at the same time, the public interest</p> <p style="text-align: center;">Page 37</p>	<p>1 Q. This is Mr Gashi, is it? 2 A. That's right, Gashi, who has now been described as an 3 unreliable witness and has mental health problems. 4 Q. It's fair to say that Mr Gashi has caused problems in 5 a number of the cases you've been involved in? 6 A. That's right. 7 Q. Mr Kramer's case is now the subject of civil 8 proceedings, isn't it? 9 A. That's right. I think he's taking action against us for 10 malicious prosecution, which is bizarre, because we 11 don't bring the prosecutions, but nevertheless it's 12 ongoing litigation. 13 Q. I see. I won't go into the details for that reason, but 14 perhaps we could have up on the screen the document at 15 tab 7 because I'd just like to draw attention to the 16 text almost at the bottom of the page, where we see the 17 way in which advertisements were made for things to 18 investigate. It reads, three lines up from the bottom 19 of the penultimate paragraph: 20 "Do you know a scandal that Maz should expose? If 21 so, you can ring him any time." 22 And then there was a telephone number and an email 23 address at the News of the World. 24 What sort of percentage of your investigations arose 25 from advertising of that kind?</p> <p style="text-align: center;">Page 39</p>
<p>1 is of paramount importance too. I mean, we always 2 liaise with the police so that they can make arrests and 3 secure the evidence and we're happy to co-operate fully 4 when we can. Of course, our motive is to publish an 5 article in the newspaper. I'm not a police officer, I'm 6 not a social worker; I'm a journalist. 7 Q. The cases we've gone to so far are cases in which the 8 convictions have been upheld. That's not always been 9 the case, has it? We can look now at some of the cases 10 you draw our attention to in which the conviction has 11 not been upheld. The first, at tab 7, is the case of 12 Mr Kramer(?), and you tell us that he initially was 13 convicted, I think on a guilty plea? 14 A. That's right. This is a man who provided me with a fake 15 passport and provided me with a quantity of drugs, and 16 then offered to supply me an even larger quantity of 17 drugs. He was arrested as a result of our work and 18 pleaded guilty, sentenced to four and a half years. He 19 then appealed and the conviction was reduced by a period 20 of nine months. Later down the line, he discovered that 21 one of the informants involved in this investigation had 22 been discredited and appealed again and the conviction 23 was quashed. I was not even made aware of the fact that 24 this appeal was taking place or in fact that it had been 25 quashed until I read about it in the paper.</p> <p style="text-align: center;">Page 38</p>	<p>1 A. A very, very small proportion. Very small. The 2 majority were people ringing up to say, "My neighbour is 3 claiming dole when he shouldn't be", just minor 4 offences. 5 Q. I see. Perhaps we can go to tab 8, where you draw our 6 attention to the case of Alin Turku(?) against News 7 Group Newspapers Limited. This is a judgment in civil 8 proceedings, isn't it, proceedings which were brought 9 for defamation -- 10 A. That's right. 11 Q. -- by Mr Turku. But the subject matter was the plot 12 that you uncovered to kidnap a very famous footballer's 13 wife? 14 A. That's right, Victoria Beckham. 15 Q. And that investigation has been the subject of 16 criticism, hasn't it, from various quarters? 17 A. That's right. I mean, last week you were told, one, 18 that it was a figment of my imagination, the entire 19 plot, by one of the witnesses here. And you were also 20 told that the entire story rested on one taped 21 conversation in a snooker hall. Well, your witness was 22 wrong on both counts. It was not a figment of my 23 imagination and it did not rely on one conversation and 24 there was no snooker hall involved. 25 We received information that we believed to be</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 credible, collated a lot of evidence, taped evidence, 2 a series of meetings that all pointed to -- and let's 3 not forget, these were eastern bloc criminals, serious 4 criminals who were convicted, as a result of my work, of 5 stealing works of art from the Sotherby's vault, which 6 in itself is no mean feat. 7 We presented our evidence to the police. They 8 vetted it all, went through our tapes, forensically 9 examined it all. The CPS, some months later, decided to 10 charge these individuals. The case was -- in fact, it 11 was dropped, I think, didn't get to court, was dropped 12 on the basis that the informant you mentioned, Gashi, 13 had failed to disclose to the CPS and the police that 14 he'd received a payment in connection with this story. 15 However, as you mentioned, it did go to court in 16 this defamation case, where Mr Justice Eady went 17 through -- 18 Q. If I can just stop you there, Mr Mahmood, because I'm 19 going to take you through it. 20 A. All right. 21 Q. Because in the light of the evidence we've heard about 22 this, it's right that I should. We don't need to have 23 the first page up on the screen. It suffices for me to 24 say that what the judgment does at the start is explain 25 that the claimant was described in Romania as a very Page 41</p>	<p>1 "The defendant's position is thus wholly 2 unenviable." 3 And this, of course, is a case which, as you say, 4 the News of the World won? 5 A. That's right. 6 Q. Having pause just to look at the CFA figure, can we now 7 move and have up on the screen, please, paragraphs 41 8 and 42. Thank you. This is the matter you adverted to 9 a moment ago, the point at which the Crown offered no 10 evidence in the criminal prosecution relating to the 11 kidnap plot. It explains the problem that there was 12 with Mr Gashi at paragraph 41. 13 Moving on to 42, it refers to the details of the 14 problem: 15 "The new information to which counsel referred 16 related to another News of the World investigation in 17 which Mr Gashi had been the informant. It concerned 18 alleged drug dealing by Wandsworth parking attendants, 19 on which an article had been published on 1 September 20 2002. Mr Altman, counsel for the prosecution, told the 21 court on 2 June 2003: 'Whatever the true position about 22 the source of the drugs, the evidence reveals that Gashi 23 had set up Z and others [ie the parking attendants] into 24 committing the offences when there was simply no 25 evidence that they had been committing such offences Page 43</p>
<p>1 intelligent criminal. He'd secured political asylum in 2 this country on a completely false basis and even when 3 that was uncovered, he'd been able to stay here because 4 he'd also lied about his age. 5 A. Right. 6 Q. He was arrested with forged identity documents and it 7 transpired that not only had he deceived the immigration 8 authorities, he'd also deceived his employers, getting 9 a job despite his immigration status. 10 Perhaps now I can ask for page 2, paragraphs 6 and 11 7, to go up on the screen. Let's take an excursion off 12 to another subject of interest to the Inquiry, and 13 that's the subject of conditional fee agreements. In 14 this case, it's right, isn't it, the claimant was 15 represented by a solicitor advocate acting on a CFA? 16 A. That's right. 17 Q. And the consequence of that was because the claimant was 18 impecunious, even a win to the News of the World would 19 leave it out of pocket in terms of costs? 20 A. That's right. I think we won the case, and I can't 21 remember what the figure was, but it wasn't much change 22 from £500,000. So it was an expensive win. 23 Q. That was recognised in the judgment, looking at the last 24 sentence of paragraph 6. Having summarised the 25 position, Mr Justice Eady concluded: Page 42</p>	<p>1 previously.' The prosecution in the current case was 2 now in possession of information first indicating that 3 Gashi had set up individuals for an earlier 4 investigation by the News of the World. Secondly, it 5 confirms that he was in financial difficulty before the 6 current investigation got under way, and thirdly, that 7 he had lied about the history of the matter in the 8 witness statement that he had made for the purposes of 9 the potential prosecution. One other matter which came 10 to light and which has caused us great concern was 11 evidence that Gashi had unquestionably lied to the 12 police in this investigation about the receipt of money 13 for his information. Of course, the receipt of reward 14 money necessarily impacts upon the perception one may 15 have about his motives." 16 I should clarify straight away that it's right, 17 isn't it, that later in the judgment the court made 18 a finding that you had told the police all about the 19 payment to Mr Gashi. So there's no criticism of you in 20 that regard. 21 What I would like to ask you is: in relation to this 22 Wandsworth parking attendant story, did you have any 23 involvement in that story at all? 24 A. Yes, I did. I think I wrote the story. I can't 25 remember the details of it, but certainly there were Page 44</p>

<p>1 parking attendants that had sold me drugs. I can 2 remember one chap selling me -- he had a whole bag of 3 cannabis in his car, took me to his car and gave me some 4 cocaine -- cannabis, rather. And I think there was 5 somebody else that sold cocaine. From memory. It was 6 a long time ago; I don't recall the details. 7 Q. I don't really need the details. What I'd like to ask 8 you next is: it's right, isn't it, as we see from the 9 judgment, that there was plainly a real problem with the 10 way Mr Gashi behaved during the course of that 11 investigation? 12 A. I think that later transpired. I don't think it went to 13 court, actually. I don't think there was -- I certainly 14 didn't give evidence in that case. 15 Q. I see. What I want to ask now, what arises from that: 16 if there was a problem with Mr Gashi's behaviour because 17 he'd set up Z and the others into committing the 18 offences, it calls into question the supervision on 19 these investigations. You say in your first witness 20 statement that it's your responsibility -- 21 A. Sure. 22 Q. -- to supervise and make sure everybody stays on the 23 right side of the ethical line. 24 A. Sure. 25 Q. Obviously something went wrong on this case. Can you</p> <p style="text-align: center;">Page 45</p>	<p>1 there was complete and utter supervision. 2 Q. I'm not asking you about -- 3 A. That story -- I can't recall the details of that story. 4 Q. I see. 5 A. It was a long time ago. As I say, I've written more 6 than 500 stories for the paper. 7 Q. In general terms, what sort of supervisory arrangements 8 would you have to ensure that somebody who was working 9 on your team didn't cross the line? 10 A. The purpose of informants is that -- I mean, these are 11 people that are embedded in that criminal world. Their 12 role is largely to introduce us in. Quite often they're 13 not required at all. They can just give us the 14 information and we act alone. But in cases where they 15 are involved, they are very closely supervised, well 16 briefed on what they can and cannot say, and you know, 17 everything's on tape, so there's no scope for them to go 18 off piste, as it were. 19 Q. You say no scope to go off piste. Plainly, Mr Gashi 20 managed to do just that in the parking case. 21 Can I ask you this: as a very experienced 22 investigative reporter, are there any particular 23 supervisory measures that you would recommend are 24 essential for investigative journalists? 25 A. Well, it all comes back to the PCC code. I mean,</p> <p style="text-align: center;">Page 47</p>
<p>1 help us with what supervisory arrangements were in place 2 on this investigation? 3 A. As I say, I can't remember the details of that 4 investigation, but the very nature of my work means 5 that, you know, I'm dealing with the bottom echelons of 6 society quite often. We're dealing with some pretty 7 obnoxious people. That's the only way you can expose 8 crack dens and drug dealers. We have to deal with 9 people of this ilk. And as I've said, what counts is 10 the reliability of their evidence, which we test. In 11 the Beckham case, there was clear evidence -- and 12 Mr Justice Eady agreed with me on that -- that there was 13 a plot to kidnap Victoria Beckham. I mean, you may get 14 information coming from very undesirable cases and it is 15 our role to check the information. 16 Certainly in the case you're referring to, these 17 guys did sell me drugs. It didn't go to court. I can't 18 remember the full details. 19 Q. I understand all of that, but my question was about 20 supervisory arrangements. I think your answer, if 21 anything, demonstrates the need, when working in these 22 murky worlds, to have particularly good supervisory 23 arrangements. Are you able to help us with what 24 supervision there was on this -- 25 A. Yes, there was supervision. On the Beckham Inquiry</p> <p style="text-align: center;">Page 46</p>	<p>1 I think the code sets the parameters very firmly of what 2 we can and cannot do. 3 Q. If the code tells you what you can and can't do, 4 I suppose my question is more about how do you make sure 5 that those working with you stay on the "can" side of 6 the line? 7 A. Certainly when they're working with us, invariably I'm 8 present or one of my colleagues is present and dictating 9 the terms of the way they behave. 10 Q. Mr Mahmood, I'm not at this stage trying to criticise 11 events from the past. What I'm trying to do is tease 12 out from your experience if there are particular 13 safeguards that you think are important to ensuring that 14 journalists in the future, working in these murky 15 worlds, stay on the right side of the line? 16 A. Absolutely. There should be full briefings for anybody 17 involved in any investigation. They must be aware of 18 the PCC code and must also abide by any advice we get 19 from our lawyers. As I say, on every investigation, 20 we're constantly in touch with our lawyers. 21 Q. We can move on now to -- if we can have up on the 22 screen, please, a page which has paragraph 94 at the 23 top. Thank you. 24 I need to tell everyone that on the page before, 25 paragraph 93 is dealing with the question of whether</p> <p style="text-align: center;">Page 48</p>

<p>1 there was or was not a plot, which, as you pointed out, 2 has been the matter of some criticism. We see at the 3 very top of the page, last sentence in the paragraph: 4 "On the evidence before this court, therefore, the 5 balance of probabilities lies firmly in favour of the 6 defendant." 7 That's the News of the World, the judicial finding 8 of the plot. 9 In paragraph 94, the finding was, wasn't it, that 10 there wasn't a gang but there was a group of loose 11 associates prepared to take part in any criminal 12 activity that suited them? 13 A. Correct. 14 Q. Then paragraph 95, there it is some criticism of the 15 reporting. The criticism is of the attribution of 16 a surveillance role to the claimant in the action, isn't 17 it? 18 A. That's right. 19 Q. And the court found that that was an invention? Is that 20 criticism a criticism which you accept? 21 A. Of course, we accept the criticism by Mr Justice Eady, 22 but having said that, that was information that I was 23 provided and I relied on the information given to me by 24 Gashi. 25 Q. I see. So you would say, would you, that this was Page 49</p>	<p>1 to you: it must be a matter of regret, mustn't it, that 2 on such a high profile and important story, there was 3 a good deal of sloppiness and inaccuracy when it was 4 published? 5 A. That I don't agree with. I think it might be worth your 6 while looking at the taped evidence on this. The 7 assertion that there was not a plot to kidnap the 8 children -- I mean, very clearly you see one of the 9 members of the gang saying that's precisely what they 10 intend to do. So I think that on that point I would 11 disagree. 12 Q. I see. So on the facts -- 13 LORD JUSTICE LEVESON: But actually, Mr Justice Eady said 14 that Gashi managed to extract comments to the effect 15 that they'd be kidnapped, but that was as far as it 16 went. 17 A. Sure. 18 LORD JUSTICE LEVESON: That's what he says, the judge says 19 A. That's right. 20 MR BARR: So he seems to have that point and is still 21 critical. Do you accept these criticisms? 22 A. I don't, no. 23 Q. If you don't accept the criticisms, I'm not going to 24 explore them further here, but can I put this general 25 point to you: you would accept, wouldn't you, that it's Page 51</p>
<p>1 a case of an inaccuracy which was regrettable, but in 2 the circumstances one for which the newspaper was not 3 culpable? 4 A. Absolutely. 5 Q. Can we go on to another criticism, on paragraph 104. At 6 paragraph 104, we see the way in which Mr Justice Eady 7 summarises matters: 8 "There may be a good deal of sloppiness and 9 inaccuracy in what was published. There was no plot to 10 kidnap the Beckham children as such. Gashi managed to 11 extract comments to the effect that they would be 12 kidnapped if they happened to be with their mother but 13 that was as far as it went. Nor could the gang be said 14 to be on the brink of the kidnap. Nor was there any 15 evidence that the Beckhams' Cheshire home was being kept 16 under surveillance. The claimant was not allotted 17 a surveillance role; nor had he done or said anything to 18 support the allegation, at least anything which the 19 News of the World journalists knew about. There was 20 nothing to justify the assertion that he was in charge 21 of surveillance. The only conclusion I can draw is that 22 it was a bit of creativity on the part of Mr Mahmood or 23 one of the subeditors." 24 It doesn't matter for the Inquiry's purposes quite 25 what the source of the inaccuracy was, but my question Page 50</p>	<p>1 very important for an investigative journalist to be as 2 accurate as possible? 3 A. Absolutely. We try our best. 4 Q. We needn't have it up. You set out the material parts 5 in your witness statement which everyone can read. 6 A. Right. 7 Q. In paragraph 113, you're described as hard-bitten and 8 cynical, but the proposition that you'd made the story 9 up is roundly rejected by the judge, isn't it? 10 A. That's right. 11 Q. Thank you. 12 Can we move now very briefly to the red mercury case 13 or dirty bomb plot. Here, as I understand it, the point 14 you wish to make in response to the criticisms that had 15 had made is that the defendants were acquitted by the 16 jury and that the trial ran the distance? 17 A. No, that's not just the criticism I'd wish to make. 18 I think it goes a lot further than that. I received 19 information from a source that appeared to be very 20 reliable, a businessman, that some people -- he'd been 21 approached to supply some material for a dirty bomb and 22 the people that had approached him -- again, this was 23 a businessman who worked in the city -- that approached 24 him seemed very credible. I had a meeting with that 25 individual that was seeking to buy red mercury. As soon Page 52</p>

13 (Pages 49 to 52)

<p>1 as I'd had that meeting, I saw that this was a potential 2 serious threat here, even though I was sceptical about 3 the whole notion of red mercury. 4 We did the right thing. We went straight to the 5 police, to the anti-terror squad, said, "This is what 6 we've been approached, this is what we've collated 7 evidence-wise", and then they started the investigation. 8 I was signed up for that job alone as a participating 9 informant so they dictated my entire role in that 10 investigation. All subsequent meetings were controlled 11 by the anti-terror squad because obviously this was 12 a matter of national security. 13 So I think it's unfair to criticise me over that. 14 We did what any responsible journalist or any 15 responsible citizen would do when told about a potential 16 terrorist plot. You go straight to the police. That's 17 what we did. The decision to prosecute was made by the 18 CPS, who obviously felt the evidence was sufficient and 19 I think even after the trial collapsed, they issued 20 a statement saying that the case had been properly 21 brought and they felt it was the right thing to do. 22 Q. I see. Moving now to the final matter I want to put to 23 you. It's the question of your investigation of the 24 snooker player, Mr John Higgins. You've exhibited to 25 your statement a copy of the decision in relation to the Page 53</p>	<p>1 are professional association. 2 So on that one -- you know, it bemuses me how anyone 3 could criticise us over that one. 4 MR BARR: Thank you very much, Mr Mahmood. 5 LORD JUSTICE LEVESON: Could I just ask a couple of 6 questions? 7 Questions by the Judge 8 LORD JUSTICE LEVESON: It's not directed to your 9 investigations that expose criminality at all. It goes 10 back to two features. First of all, the moral 11 investigations which you say were only a very, very 12 small part of your work, but which actually are rather 13 more significant part of what I'm considering. Do you 14 take the view that somebody who is, say, a member of 15 Parliament, if involved in an extramarital affair, is 16 justifiably the subject of a public investigation and 17 exposure simply because he's a member of Parliament? 18 A. That's right. I mean, we vote for these people. They 19 hold public office. We expect a certain code of 20 behaviour from them. I don't think I'd vote for my MP 21 if I knew that he was cheating on his wife. How could I 22 trust him to represent me? That's my personal opinion. 23 LORD JUSTICE LEVESON: So there's no privacy for such 24 a person at all? 25 A. I don't think there should be. If you hold public Page 55</p>
<p>1 way in which his professional body dealt with him and 2 his manager, and as I understand it, the points that you 3 want to bring out is that for all the criticisms that 4 have been made of your work on this story, the fact 5 remains that Mr Higgins was disciplined for two serious 6 offences of misconduct and his manager was banned for 7 life; is that right? 8 A. It goes beyond that. I think that the criticism is 9 completely unfounded. It's been suggested that we 10 doctored videos. In fact, your witness also suggested 11 that we doctored videos in the cricket case. That's an 12 allegation even the defendants haven't made. 13 So you have all these people making suppositions and 14 wild accusations, but the Higgins case is a case in 15 point. This was a man I was told was involved in fixing 16 matches, had done it previously. We had meetings with 17 him and his manager. His manager confirmed that he 18 would throw games and there was a discussion with 19 Higgins in which he even discussed how we should pay him 20 the money for fixing a frame, how he wanted us to pay 21 off his villa in Spain. 22 The investigation was praised by the governing body 23 of snooker, Barry Hearne, who introduced new regulations 24 as a result of our investigation. These guys were found 25 guilty -- pleaded guilty to the charges brought by they Page 54</p>	<p>1 offence, you should be open to scrutiny. 2 LORD JUSTICE LEVESON: And the same would be so for anybody 3 who may be an actor or an author, anybody who's made 4 money from the public? 5 A. No, no, no. We're talking about -- I mean, MPs are 6 people who are elected and they hold public office. 7 I think it would be slightly different for actors and 8 the likes. 9 LORD JUSTICE LEVESON: So you wouldn't -- 10 A. There would have to be grounds. If they are appearing, 11 as I said, in Hello magazine as happy families and 12 cashing in on their status as, you know, happily married 13 individuals, family men, and then are cheating, then 14 sure, they should be exposed for hypocrisy, if there's 15 a degree of hypocrisy about it. 16 LORD JUSTICE LEVESON: But the mere fact of celebrity would 17 not be sufficient? 18 A. No, not in my opinion. 19 LORD JUSTICE LEVESON: Yes. Did you work day by day in the 20 offices of the News of the World or were you detached? 21 A. I was detached. I'd seldom come into the office. 22 LORD JUSTICE LEVESON: I see. Have you seen on the 23 recording or read the evidence that Mr McMullan gave to 24 the Inquiry? 25 A. Yes, I have. He hasn't worked for a paper for many, Page 56</p>

<p>1 many years and it certainly doesn't --</p> <p>2 LORD JUSTICE LEVESON: I'm not interested in when he worked</p> <p>3 for a paper.</p> <p>4 A. Sure.</p> <p>5 LORD JUSTICE LEVESON: What I want to know is this: does he</p> <p>6 give an account that you recognise?</p> <p>7 A. Not at all.</p> <p>8 LORD JUSTICE LEVESON: Not at all?</p> <p>9 A. Not in the least, no.</p> <p>10 LORD JUSTICE LEVESON: So it should carry no credence at</p> <p>11 all? That's why I asked you whether you went into the</p> <p>12 office, because you could say, "Well, actually,</p> <p>13 I couldn't tell you", but if you're saying it doesn't,</p> <p>14 that I would like to know.</p> <p>15 A. Sure. Well, no, it doesn't. It certainly doesn't</p> <p>16 reflect my experience at News of the World.</p> <p>17 LORD JUSTICE LEVESON: But you didn't go into the office.</p> <p>18 A. I was in and out of the office, of course, you know,</p> <p>19 but -- I mostly worked away from the office, but I was</p> <p>20 in constant touch with the news desk.</p> <p>21 LORD JUSTICE LEVESON: I see. Thank you very much.</p> <p>22 MR DAVIES: Might I just complete one point of fact, if</p> <p>23 I may?</p> <p>24 LORD JUSTICE LEVESON: Yes.</p> <p>25 Questions by MR DAVIES</p> <p style="text-align: center;">Page 57</p>	<p>1 Q. You have provided the Inquiry with a witness statement</p> <p>2 which is currently in draft. Would you confirm, please,</p> <p>3 subject to one change I know you wish to make, that that</p> <p>4 statement is both truthful and the evidence you would</p> <p>5 like to give to this Inquiry?</p> <p>6 A. It is.</p> <p>7 Q. The change you would like to make -- the statement is</p> <p>8 not paginated, but it relates to a decision in the</p> <p>9 French jurisdiction in October of this year where you</p> <p>10 say in your statement as currently constituted --</p> <p>11 I think it's the fifth page. You say:</p> <p>12 "In October this year, the French courts appeared to</p> <p>13 disagree with him [the 'him' in is that sentence is</p> <p>14 Mr Justice Eady]. Although he has accepted his privacy</p> <p>15 had been invaded, they ruled that I did not defame him,</p> <p>16 thereby supporting the truth of the article."</p> <p>17 First of all, have you now read a translation of the</p> <p>18 judgment of French court?</p> <p>19 A. Yes, I have.</p> <p>20 Q. Had you read a translation of the judgment of the French</p> <p>21 court when you gave that draft witness statement?</p> <p>22 A. No, I'd requested it but hadn't received it from</p> <p>23 Farrers.</p> <p>24 Q. What is your position now, Mr Thurlbeck, in relation to</p> <p>25 the French judgment?</p> <p style="text-align: center;">Page 59</p>
<p>1 MR DAVIES: Mr Mahmood, you were asked about</p> <p>2 Mr Justice Eady's judgment in the Turku case. Do you</p> <p>3 know whether there was an appeal in that case?</p> <p>4 A. Yes, I think there was.</p> <p>5 MR DAVIES: Can you tell us what happened?</p> <p>6 A. I think we decided to settle, largely on commercial</p> <p>7 grounds. It's a question to put to the lawyers, really.</p> <p>8 MR DAVIES: Thank you very much.</p> <p>9 LORD JUSTICE LEVESON: Thank you very much. We'll have</p> <p>10 a short break.</p> <p>11 (11.50 am)</p> <p>12 (A short break)</p> <p>13 (12.01 pm)</p> <p>14 LORD JUSTICE LEVESON: Yes, Mr Jay.</p> <p>15 MR JAY: Sir, the next witness is Mr Neville Thurlbeck,</p> <p>16 please.</p> <p>17 LORD JUSTICE LEVESON: Can we confirm, please, that we are</p> <p>18 back online visually?</p> <p>19 THE TECHNICIAN: We're told we are, sir.</p> <p>20 MR NEVILLE THURLBECK (sworn)</p> <p>21 Questions by MR JAY</p> <p>22 MR JAY: Mr Thurlbeck, please sit down and make yourself</p> <p>23 comfortable. There's a glass of water there for you.</p> <p>24 Could you please confirm your full name?</p> <p>25 A. Neville Thurlbeck.</p> <p style="text-align: center;">Page 58</p>	<p>1 A. My position is that the defamation matter -- although</p> <p>2 I was acquitted of defaming Mr Mosley, this was on the</p> <p>3 basis that I hadn't been responsible for distributing</p> <p>4 the newspapers in France.</p> <p>5 Q. That's correct. The French courts, if I can put it in</p> <p>6 these terms, were loyal to the findings of</p> <p>7 Mr Justice Eady, but the defamation claim against you</p> <p>8 was rejected on grounds of jurisdiction?</p> <p>9 A. That's correct.</p> <p>10 Q. May I deal, first of all, with your career in</p> <p>11 journalism. You cover this in your witness statement of</p> <p>12 course. You started off at the News of the World as</p> <p>13 a crime correspondent, I think, and your career</p> <p>14 culminated as chief reporter between 2003 and 2011; is</p> <p>15 that right?</p> <p>16 A. Almost. I started off as a general news reporter,</p> <p>17 a senior news reporter.</p> <p>18 Q. Yes. Now, chief reporter, 2003 and 2011 -- can you tell</p> <p>19 us a bit about that? What were the range of things you</p> <p>20 were reporting on?</p> <p>21 A. I wasn't a specialist anymore, so it would cover the</p> <p>22 whole spectrum of news events.</p> <p>23 Q. News events? Does that cover or exclude features,</p> <p>24 showbiz? Could you be more specific?</p> <p>25 A. Yes. Well, it would include investigations, it would</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 include interviews, it would include showbiz stories, 2 crime stories. Right across the spectrum, really. 3 There was no specific specialisation for me. 4 Q. Thank you. Two other matters by way of context to your 5 evidence. Is it right that you are in litigation with 6 News International over employment issues before 7 an employment tribunal? 8 A. That's correct. 9 Q. Is it also right that you have been arrested in 10 connection with Operation Weeting? 11 A. That's correct. 12 Q. And it follows from that that you are not going to give 13 evidence to this Inquiry about phone hacking issues; 14 have I understood that correctly? As is your 15 entitlement. 16 A. Yes. I've requested specifically that the Leveson 17 Inquiry does not question me on any matters concerning 18 phone hacking, and I've received an assurance from your 19 team of solicitors, to use their words, that phone 20 hacking is off limits. 21 Q. Yes. 22 LORD JUSTICE LEVESON: The position is very simple, 23 Mr Thurlbeck. I am determined not to prejudice any 24 investigation being conducted by the Metropolitan Police 25 or any possible prosecution that might follow. You have</p> <p style="text-align: center;">Page 61</p>	<p>1 you list those. You also say that those investigations 2 often placed you in a position of personal danger. 3 Would you like to tell us more about that in your own 4 words, Mr Thurlbeck? 5 A. Well, any undercover investigation involving criminals 6 had its inherent dangers. In the 1990s and the early 7 2000s, my main job was as an undercover reporter and 8 specifically crime. So the people I was exposing would 9 be gun runners, paedophiles, drug dealers, and in order 10 to expose them, you would have to equip yourself, 11 obviously, with recording devices to record their 12 admissions and write about it in the newspaper without 13 fear of being sued for libel. But there was always the 14 ever-present risk that you would reveal yourself as 15 a journalist to the person you were exposing and 16 thereby, you know, confront possible danger. 17 Q. Yes. You deal with one or two close shaves in your 18 statement, don't you? 19 A. Well, I don't really want to go into too much detail -- 20 LORD JUSTICE LEVESON: No, all Mr Jay was saying was that 21 you mentioned them. You answered yes, then fine. We'll 22 move on. 23 MR JAY: We're moving on to the next question. Something 24 rather different, actually. It's kiss-and-tell stories. 25 A. Yes.</p> <p style="text-align: center;">Page 63</p>
<p>1 an absolute right to claim privilege against 2 self-incrimination where you know that you are under 3 investigation, and I am not going to allow the Inquiry 4 to ask a series of questions which require you to claim 5 privilege so that it might be suggested that in some way 6 you shouldn't be doing that. You are entitled to claim 7 privilege, you have that privilege, and it would be 8 quite wrong for anybody to draw any conclusion or 9 inference about the fact that you wish to exercise it, 10 and therefore I have decided that the better course is 11 that on the topic of phone hacking, there should be no 12 questions at all of those who are under investigation. 13 So you are correct, but I want to put the context 14 quite clearly in the public domain. 15 A. Thank you. 16 MR JAY: Mr Thurlbeck, if I may go back to your witness 17 statement at the bottom of the first page, where you 18 identify your awards and nominations. The 2005 British 19 Press Awards for scoop of the year, was that for the 20 Rebecca Loos story? 21 A. 2005? 22 Q. Yes? 23 A. Yes, it was, yes, sir. 24 Q. In your statement, you cover a range of investigations 25 you undertook which led to the jailing of criminals and</p> <p style="text-align: center;">Page 62</p>	<p>1 Q. Were you involved in the arrangement, if I can so 2 describe it, of writing such stories? 3 A. The journalists had to get pigeonholed quite early in 4 their careers. My pigeonhole, if you like, was 5 undercover work, originally, and that stayed with me 6 right throughout my career there. I wasn't really 7 pigeonholed as a kiss-and-tell journalist. That's not 8 to say that I didn't do some kiss-and-tell stories, but 9 by and large, they sort of passed me by and went 10 elsewhere. 11 Q. You did some; is that your evidence? 12 A. I did some, yes. 13 Q. Can you give us some idea of the costs? I mean, 14 kiss-and-tell, there's always a financial incentive for 15 the kisser, as it were, to provide the story; that is 16 correct, isn't it? 17 A. Yes. 18 Q. Give us an idea of how much these stories cost, please? 19 A. Well, it would vary. It depends, really, on where in 20 the newspaper the article would be placed. So, for 21 example, a front-page lead -- what we in industry call 22 a splash or front page splash -- would cost 23 significantly more than a page 45 lead, for example, so 24 there would be a kind of a sliding scale, and then the 25 story would be then judged on its merits as to how much</p> <p style="text-align: center;">Page 64</p>

<p>1 of an impact it would make, how important we thought the 2 story was to the newspaper and then a figure would be 3 arrived at. 4 Q. So it would be a question of calibrating the value of 5 the story to the newspaper in terms, perhaps, of 6 increased circulation or similar matters, wouldn't? 7 A. Obviously, circulation would be an issue, but then you 8 have to match the price with the person's expectations. 9 They might come in with a completely unrealistic set of 10 financial expectations, which may sort of play our hand 11 a bit higher and the stakes would be raised. It wasn't 12 a precise science. 13 Q. Market forces then; is that it? 14 A. Yes. 15 Q. What's the most, to your knowledge, that the 16 News of the World has ever paid for such a story? 17 A. I wasn't privy to how much we would be paying on 18 a weekly basis. I can only speak from my own 19 experience. There were six figure sums paid, but 20 rarely. I would say the average would be -- for a front 21 page story, an average price I would say would be about 22 £15,000. £15-20,000. Less, sometimes, depending how 23 the negotiations had gone. 24 Q. Given that money was changing hands and therefore there 25 was, at the lowest, a risk of elaboration, if not a risk</p> <p style="text-align: center;">Page 65</p>	<p>1 legal manager, a barrister, and his team, that what we 2 had was true. 3 Q. But what weight, if any, was given to privacy issues 4 before such stories were published? 5 A. Well, as we know, privacy has become a huge matter over 6 the last three years, and I would say the kiss-and-tell 7 story now is largely dead as a genre. 8 So I would say in the last three years we'd taken 9 great note of privacy matters and that was almost the 10 first question after "Is it true?" The second question 11 would always be, "Buts are we intruding into privacy? 12 Is there any justification for it?" 13 There would be lengthy debates about this. There 14 would be lengthy conversations with the editor. The 15 editor would demand to know what level of public 16 interest there was in order to, you know, avoid any 17 possible privacy issues. Colin Myler was absolutely 18 fastidious about this. It was something that we talked 19 about literally every day. It was an important matter 20 that we had to get right and we did everything we could 21 to ensure that we didn't step over those boundary marks. 22 Q. Can I just explore that last remark and ask two 23 follow-up questions. Does one fairly deduce from your 24 evidence that this is something which you say has 25 happened for punctiliously over the last three years,</p> <p style="text-align: center;">Page 67</p>
<p>1 of fabrication, what steps, if any, did you take to 2 verify the accuracy of such stories? 3 A. What stories are we talking about? 4 Q. Kiss-and-tell stories. 5 A. Kiss-and-tell stories? A great deal of activity went 6 into establishing the truth of what people were telling 7 us. There was a -- there was always a myth attached to 8 News of the World stories and the myth was that we made 9 it all up. That still prevails, I think. 10 We didn't. We went to enormous lengths to satisfy 11 our team of lawyers that what we had was factually 12 correct, but most importantly, demonstrably correct, and 13 we would verify people's claims in all sorts of ways. 14 We would ask them to provide documentary evidence, 15 photographic evidence, perhaps a message left, you know, 16 on a post card or a birthday card or some sort of gift. 17 A telephone call made to the person in question would 18 often verify their claim. Without these, we couldn't 19 run a story. 20 For every kiss-and-tell that made the 21 News of the World, because it was prudent to be accurate 22 and correct, I would estimate there would be another 23 six, ten that fell by the wayside because that standard 24 of proof wasn't obtained. Even if we believed their 25 story, it wasn't sufficient. We had to persuade our</p> <p style="text-align: center;">Page 66</p>	<p>1 but before, say, 2008, a different principle applied, 2 perhaps a laxer principle; is that correct? 3 A. I have to be honest and say the answer to that is yes. 4 This is industry-wide, where -- I don't think we were 5 unique in this position. Before the privacy ruling on 6 Mr Mosley came into place and various other injunctions 7 taken out by celebrities and so forth, there was less 8 regard to privacy, more regard to whether the story was 9 true or not. There's always been that regard. The 10 facts were always important to establish. But then it 11 became very important to establish whether or not 12 privacy issues were at stake. 13 Q. The discussions which you had described in general terms 14 with the editor at the time, what sort of considerations 15 went into the balance in deciding whether or not to 16 publish a story on public interest grounds? 17 A. Well, one would look at exposing potential hypocrisy or 18 lies. I can give an example of how that occurred 19 recently. I exposed a politician for having an affair. 20 I don't particularly want to name that politician now in 21 fairness, but it made a very big story in our newspaper 22 last year. We thought long and hard about whether or 23 not we should run this story. It became apparent that 24 there was a public interest justification because the 25 man in question had used his family and his happy</p> <p style="text-align: center;">Page 68</p>

<p>1 marriage in his election literature, so we felt that we 2 had an important justification to run the story. But 3 without matters such as that, stories would fall by the 4 wayside on a regular basis. 5 LORD JUSTICE LEVESON: So does that mean that you do not 6 consider now, whatever you might have considered before, 7 that there would be a public interest in exposing an 8 extramarital affair simply because somebody was 9 a politician? 10 A. There was less regard to the privacy issues. You know, 11 we were always aware that we hadn't to be gratuitous 12 about these things because as a newspaper you wouldn't 13 want to be in the middle of a public backlash because 14 you were seen to be too gratuitous about these things. 15 There had to be an element of justification behind it 16 and it was, generally speaking, hypocrisy, that we could 17 demonstrate on behalf of a politician, for example. Or 18 a celebrity. 19 I can give you a classic example of this -- and this 20 is going back before the privacy matters became so 21 relevant to us. That was in 2005, when I exposed David 22 Beckham's extramarital affair. We decided there was 23 huge public interest in that matter because the Beckhams 24 had been using their marriage in order to endorse 25 products. They were openly presenting themselves as</p> <p style="text-align: center;">Page 69</p>	<p>1 all about. 2 Q. I might be wrong -- of course I'm not an expert, 3 Mr Thurlbeck -- but the individual products you're 4 talking about, Brylcreem, usually there's an image of 5 Mr Beckham and that is associated with the product. 6 Where is the image of the Beckhams en famille producing 7 or fostering a particular product? 8 A. The Beckhams were always very keen to encourage 9 publicity of their happy marriage. It was part of their 10 sort of -- one of the building bricks of their business 11 was their happy family marriage. They talked about it, 12 they had photographs taken at their wedding, they 13 introduced their children to us. It was one of great 14 wholesomeness. They were always saying what a happily 15 married family they were and they were making an awful 16 lot of money because they were considered to be 17 a perfect wholesome family unit. And what we saw 18 happening outside of the marriage was in direct contrast 19 to the image they were cultivating and we said they were 20 making millions of pounds on the back of that wholesome 21 image and we thought it very important at the time to 22 expose that as being a sham. 23 Q. But wasn't it an example, though, of what the lawyers 24 might choose to call an implied representation? The 25 example of a politician who platforms on the basis of</p> <p style="text-align: center;">Page 71</p>
<p>1 a very happy, married, a very close-knit family, and 2 were making millions of pounds on the back of that 3 image, promoting themselves as a fairy tale marriage. 4 They even got married on thrones. 5 We thought it was important that we exposed that the 6 fairy tale was a sham, and therefore we decided there 7 was huge public interest in that kiss-and-tell and 8 I don't think anybody has sort of disputed that. 9 So even before privacy issues came in, we did look 10 very carefully -- very, very carefully -- as to whether 11 or not there was a justification there, and we did in 12 that case. 13 Q. What sort of products do you say the Beckhams sold on 14 the basis of this particular image? Can you be more 15 specific, please, Mr Thurlbeck? 16 A. Yes. He was a leading -- he was promoting Brylcreem at 17 the time. He had a host of other products. I don't 18 have the list here but he was sponsored left, right and 19 centre. He was always promoting himself in front o his 20 family as a happily married man. It was a wholesome 21 image that he cultivated, that the family cultivated and 22 the public bought into on a massive scale and we exposed 23 that to be a sham. I don't have a list of the products 24 in front of me at the moment, of course, but it's fairly 25 well documented that that is what the brand Beckham was</p> <p style="text-align: center;">Page 70</p>	<p>1 family values and makes that an explicit part of his or 2 her political image one can understand. That's an 3 express representation. But in relation to the 4 particular case we're discussing now, isn't it all about 5 implied representation, Mr Thurlbeck? 6 A. We thought there was as very strong justification for 7 running it on the basis of what I've just said. 8 Q. I'm not sure that quite couples with the point I'm 9 making. Do you understand the distinction I'm trying 10 to -- 11 A. Yes. 12 Q. -- draw between something being made explicit? 13 A. Well, it was explicit to us, and I suspect it was 14 explicit to all the people who had bought into that 15 image of the Beckhams being, you know, a wholesome 16 family unit. 17 Q. Okay. Did you take steps to verify the accuracy of 18 Ms Loos's story? 19 A. I did, yes. I spent five months on the story in total. 20 I spent six weeks in Australia and five or weeks in 21 Spain and it was very hard to prove, you know, the 22 validity of what the girl was saying to me. 23 We established it eventually by -- 24 Q. I'm not sure I need ask you how you proved it. The 25 question was confined to: did you take steps?</p> <p style="text-align: center;">Page 72</p>

<p>1 A. Yes.</p> <p>2 Q. And your answer, I think, was yes.</p> <p>3 A. Yes.</p> <p>4 Q. Are we talking about a six-figure sum here for Ms Loos?</p> <p>5 A. I don't think we've ever declared exactly how much we</p> <p>6 paid Ms Loos.</p> <p>7 Q. No, but the question was: are we talking about</p> <p>8 a six-figure sum?</p> <p>9 A. I'm trying to think of a good reason why I shouldn't</p> <p>10 tell you how much we paid her. There may be issues of</p> <p>11 confidentiality that we had with Ms Loos at the time --</p> <p>12 LORD JUSTICE LEVESON: I'm not really concerned, I don't</p> <p>13 think, about your issues of confidentiality with</p> <p>14 Ms Loos. I don't want to know the precise sum, but</p> <p>15 I am interested in the order of magnitude, I think,</p> <p>16 following Mr Jay's question. Unless somebody wants to</p> <p>17 suggest I shouldn't be? No. Right, order of magnitude,</p> <p>18 please.</p> <p>19 A. Okay. We are talking about a six-figure sum. It was</p> <p>20 the most I think I've ever paid for a story. We're</p> <p>21 talking about a six-figure sum, just.</p> <p>22 MR JAY: Not quite seven figures, Mr Thurlbeck --</p> <p>23 LORD JUSTICE LEVESON: All right, all right, we've got the</p> <p>24 message. Move on.</p> <p>25 MR JAY: Move on to Mr Mosley's case. Would you agree,</p> <p style="text-align: center;">Page 73</p>	<p>1 Jason asked for, £25,000.</p> <p>2 A. Yes.</p> <p>3 Q. "I agreed to this amount on the condition that this</p> <p>4 story was selected to be the splash."</p> <p>5 That's the front page; is that right?</p> <p>6 A. That's correct.</p> <p>7 Q. "I told Jason that if this was not the case, I would</p> <p>8 only be able to offer him less money and an inside story</p> <p>9 would be £6,000."</p> <p>10 In the result, I think, Woman E got £12,000; is that</p> <p>11 correct?</p> <p>12 A. I think so, yes.</p> <p>13 Q. In paragraph 24:</p> <p>14 "I explained to Jason that I would need to meet with</p> <p>15 Michelle to arrange for her clothes to be fitted with</p> <p>16 a hidden camera and show her how to operate it. It was</p> <p>17 important for Michelle to video the orgy to ensure that</p> <p>18 we had sufficient evidence should Mr Mosley threaten to</p> <p>19 sue the News of the World for libel."</p> <p>20 That suggests, rather, that the purpose of the video</p> <p>21 was only to obtain evidence in order to defeat</p> <p>22 a possible libel claim; is that correct?</p> <p>23 A. Normally that would be the case. But in recent years,</p> <p>24 with the development of the News of the World website,</p> <p>25 there was always the possibility there that the video</p> <p style="text-align: center;">Page 75</p>
<p>1 Mr Thurlbeck, that without the Nazi theme allegation</p> <p>2 there wasn't a public interest in publishing the story?</p> <p>3 A. Yes, I would agree with that.</p> <p>4 Q. Would you also agree that it follows from that that it</p> <p>5 was important to demonstrate that there was a Nazi</p> <p>6 theme?</p> <p>7 A. Yes.</p> <p>8 Q. When you started on the story after, I believe, an</p> <p>9 initial approach, you, of course, knew from your general</p> <p>10 knowledge about Mr Mosley's father, Sir Oswald Mosley;</p> <p>11 am I correct?</p> <p>12 A. Yes.</p> <p>13 Q. The initial tipster, he was a man named Jason; is that</p> <p>14 correct?</p> <p>15 A. That's correct.</p> <p>16 Q. Can I just deal with some of the evidence there? It's</p> <p>17 not my task or purpose to relitigate this litigation</p> <p>18 since it's a matter of record and we simply can't in any</p> <p>19 way undermine the findings of Mr Justice Eady, nor do we</p> <p>20 wish to, since his findings were not appealed, but if</p> <p>21 I could just look at a document which is number 31344.</p> <p>22 I hope in the bundle you have, Mr Thurlbeck, it's</p> <p>23 underneath tab 4. It's part of your witness statement</p> <p>24 in the High Court proceedings. It's paragraph 23, where</p> <p>25 you deal with the issue of payment for the story, that</p> <p style="text-align: center;">Page 74</p>	<p>1 could be used on the website.</p> <p>2 Q. Why was the video ever put on the website, Mr Thurlbeck?</p> <p>3 A. I can't answer that question because I don't know.</p> <p>4 I had no involvement ever with the uploading of videos</p> <p>5 onto the website.</p> <p>6 Q. Were you not aware, given your close participation in</p> <p>7 the assembly of this story, that the video was going to</p> <p>8 be placed on the News of the World website?</p> <p>9 A. It was always going to be a possibility, yes.</p> <p>10 Q. When did you know that it was going to happen?</p> <p>11 A. I can't remember.</p> <p>12 Q. We know that the story itself was published on 28 March</p> <p>13 2008, I believe. Sorry, it's 30 March 2008.</p> <p>14 A. Yes.</p> <p>15 Q. In relation to that date, how long before was the</p> <p>16 decision made to publish the video on the website?</p> <p>17 A. I really don't know. In fact, the first I probably,</p> <p>18 probably knew about it going on the website I think</p> <p>19 would be when I saw it myself the following day.</p> <p>20 I think, from memory. I had -- my recollection is that</p> <p>21 there were no discussions with me about, you know, it</p> <p>22 being uploaded to the website. That was a completely</p> <p>23 different department. It was literally in another</p> <p>24 office somewhere. They'd get the video and up it would</p> <p>25 go.</p> <p style="text-align: center;">Page 76</p>

<p>1 Q. Who took the decision? 2 A. To upload it? It would always be the editor's decision. 3 Q. Of course, you were handing over the film -- 4 A. Yes. 5 Q. -- to the relevant person. Wasn't there some sort of 6 discussion as to what would happen to it? 7 A. I didn't hand it over. I left the video in the office. 8 It was there to be looked at by our barrister, our 9 editor, our news editor, deputy news editor; all the 10 people who were deciding the validity of the story, 11 where it was going to go in the newspaper and whether 12 the words I had written corresponded to what they'd seen 13 on the video. So I kind of relinquished control of the 14 video when I brought it to the office. 15 Q. You didn't relinquish control of the story, since you 16 wrote it on 30 March. 17 A. Yes. 18 Q. Are you saying that at the time you wrote the story -- 19 and you must have, as it were, perfected it probably on 20 the Saturday; is that right? 21 A. Yes. 22 Q. -- you were unaware that there would be an associated 23 video? Is that your evidence? 24 A. No, I can't -- I'm not going to be gauche about this. 25 I was always aware there with a was a direct possibility</p> <p style="text-align: center;">Page 77</p>	<p>1 reasonable quality but that it, as it were, corroborated 2 what you were going to write? 3 A. Yes. 4 Q. Can I ask you, please, about the setting up of the 5 camera, as it were. This is paragraph 37 of your 6 witness statement. 7 A. Yes. 8 Q. At page 31347. This, of course, remains your evidence 9 to Mr Justice Eady. You refer to it in your witness 10 statement. You say: 11 "I did not, at any point, coach Michelle ..." 12 Michelle is Woman E; is that right? 13 A. That's correct. 14 Q. "... as to what she should do during the S&M party. 15 I instructed her on how to use the camera and I told her 16 how she should stand and what would be video'd from 17 a certain distance and how she should turn to ensure 18 that she would be able to obtain footage for us. I did 19 not ask Michelle to perform in any particular way or to 20 say anything in particular at the party. When showing 21 Michelle how to use the hidden camera, I said to her: 22 'When you want to get him doing the Sieg Heil, it's 23 about 2.5 to 3 metres away from him and then you'll get 24 him in no problem.' The video footage of me showing 25 Michelle how to use the hidden camera records this and</p> <p style="text-align: center;">Page 79</p>
<p>1 of that being uploaded onto the website, providing, you 2 know, it was visible. Sometimes these things are poor 3 quality and may be evidential but not sort of 4 broadcastable. 5 Q. I need to look again at the story itself. I don't have 6 it immediately available, but did not the story say, "If 7 you want to look at the details, go to our website", or 8 words to that effect? 9 A. Yes, it probably would, yes. 10 Q. So you put that in the story, did you? 11 A. No. No, I didn't. When the story leaves my computer, 12 it would then go to the subeditors, who would lay it out 13 on the page, maybe change a word here or two and put 14 a headline on it and so on, and they would have put on 15 the -- that sort of information at the bottom. I can 16 never remember ever putting that on the bottom because 17 I wouldn't know that, you know, the video was going on 18 the website. When that decision had been made by the 19 editor, he would then speak to the subeditor or the 20 chief sub, and say, "It's going on the website, can you 21 put a paragraph on the bottom saying that this is so?" 22 Q. Did you not view the video yourself before you wrote the 23 story? 24 A. Yes, I -- no, I viewed it. I did. 25 Q. So you must have known that the video was not merely of</p> <p style="text-align: center;">Page 78</p>	<p>1 shows me making the Sieg Heil gesture with my arm in the 2 air and showing Michelle the sort of distance needed to 3 film it properly and get it in shot. When I said this 4 to Michelle, I was not in any sense trying to persuade 5 her to make that gesture when she was with the claimant 6 or persuade her to try and get the claimant to make that 7 gesture." 8 The question is, Mr Thurlbeck: weren't you trying to 9 do that? 10 A. No, absolutely not. I'm grateful for the opportunity to 11 correct this, and I did so, actually, at the High Court 12 hearing in 2008. If I could just refer you to what 13 Mr Mosley says in his evidence to you. He said: 14 "It was very clear to me that Thurlbeck was trying 15 to set the whole thing up from the beginning as a Nazi 16 thing." 17 But Mr Mosley misquoted me. What I actually said 18 was: 19 "When you want to get him doing the Sieg Heil, it's 20 about 2.5 to 3 metres away from him and then you'll get 21 him in no problem." 22 And I think it's clear from that statement that the 23 word "get" is a kind of a shorthand for the verb "to 24 video", "to capture". So what I'm saying to Woman E is: 25 when you want to capture him, when you want to video him</p> <p style="text-align: center;">Page 80</p>

<p>1 doing the Seig Heil, stand back 2.5 metres, otherwise 2 you won't get him in the frame. And in a rather 3 torturous way, this has now been interpreted as me 4 saying, "Get him to do the Sieg Heil", but an analysis 5 of the words that I use make it clear that that is not 6 my meaning at all.</p> <p>7 Q. Mr Justice Eady touches on this at paragraph 164 of his 8 judgment at page 31249. It may be fair to say that he 9 doesn't make an express finding either way as to whether 10 that explanation is right.</p> <p>11 Did Woman E say anything to you which led you to 12 believe expressly that there would a Sieg Heil gesture?</p> <p>13 A. No. She said there was going to be a Nazi theme. 14 Obviously the most iconic image one would expect to 15 capture would be a Sieg Heil salute. She didn't mention 16 that; nor did I encourage her to make that happen.</p> <p>17 Q. Woman E did not, of course, give evidence, did they -- 18 A. No, she -- she didn't.</p> <p>19 Q. Can I deal with the run-up to the story a little bit 20 more. Were there discussions with the editor about 21 whether there was a public interest in publishing this 22 story, given the obvious privacy issues?</p> <p>23 A. We -- it was very clear to all of us that the 24 implication that there was a Nazi theme to this party 25 was sufficient public interest to run a story --</p> <p style="text-align: center;">Page 81</p>	<p>1 Q. Can I be clear when you mean by that? 2 A. Yes.</p> <p>3 Q. Was this before or after your first meeting with Jason? 4 A. It was before, because Jason -- I have to -- it's an 5 awful long time ago, it's difficult to remember, but 6 I think Jason got in touch with us -- I spoke to him on 7 the phone first and then relayed what he was telling me 8 to the news desk and we had a conversation then about 9 whether or not this would be in the public interest, and 10 it was the suggestion of the Nazi theme which initially 11 persuaded us that it was in the public interest.</p> <p>12 Q. The first contact which Jason made with the 13 News of the World was on 13 March. You then had 14 a conversation with him on the phone on 14 March and 15 then you met with Jason first of all at Waterloo station 16 on 19 March. Does that jog your memory?</p> <p>17 A. Yes, that's about right, yeah.</p> <p>18 Q. So is it your evidence that the discussion about the 19 public interest was likely to have been before at least 20 19 March?</p> <p>21 A. I think so, but I can't remember, I'm afraid. I really 22 can't remember that.</p> <p>23 Q. This was before you had much detail about the case in 24 your mind, Mr Thurlbeck, wasn't it?</p> <p>25 A. No, it was -- I think, from memory, the first</p> <p style="text-align: center;">Page 83</p>
<p>1 LORD JUSTICE LEVESON: That's not, with respect, an answer 2 to the question. Was there as discussion about the 3 public interest? Because you're making an assumption 4 about the story, which itself requires evaluation.</p> <p>5 A. Yes.</p> <p>6 LORD JUSTICE LEVESON: So was there a discussion? 7 A. There was a discussion. There was a discussion 8 certainly between myself and the news desk.</p> <p>9 MR JAY: Did it involve the editor, Mr Myler? 10 A. I didn't speak to Mr Myler, but I'm assuming -- I don't 11 know -- that the news desk did. But I don't know. 12 I can't answer for them.</p> <p>13 Q. Can I ask you with whom did you have the discussion at 14 the news desk?</p> <p>15 A. Do you want me to name the individual? 16 Q. Yes.</p> <p>17 A. It was the deputy news editor, James Mellor.</p> <p>18 Q. Can you remember when that was? 19 A. No. Not now.</p> <p>20 Q. Can you remember approximately how long before the 21 publication of the story it was?</p> <p>22 A. It was probably, I would imagine, the day I commenced 23 the investigation, which from memory -- I can't 24 remember. It was a week or so before publication. 25 Maybe more.</p> <p style="text-align: center;">Page 82</p>	<p>1 conversation with Jason indicated that there was a Nazi 2 theme, so it was very firmly in our minds by the time we 3 went down to meet him.</p> <p>4 Q. But you had no detail by that stage? 5 A. No, no great detail.</p> <p>6 Q. Didn't you think it appropriate, given the importance of 7 this story, once all information had been obtained, 8 including the video, to have a proper discussion with at 9 least the editor about privacy issues in the context of 10 the public interest?</p> <p>11 A. With the editor? In the normal course of events, 12 I would talk to the news editor.</p> <p>13 Q. Didn't you think it appropriate to have such 14 a discussion with the news editor at that point? 15 A. Well, we did. We talked about this from the beginning.</p> <p>16 Q. You've told us that the discussion was before the first 17 meeting with Jason, which was on 19 March. Are you 18 telling us that there was a later discussion? 19 A. There with -- there were many discussions about it.</p> <p>20 Q. But were there discussions about public interest in the 21 story, in the context of the privacy, or were there 22 discussions simply about the progress of the story and 23 how juicy a story it was go to be? 24 A. I would say it included all those ingredients. 25 Q. Are you sure about that, Mr Thurlbeck?</p> <p style="text-align: center;">Page 84</p>

<p>1 A. Yes.</p> <p>2 Q. Were you aware of decisions taken within the</p> <p>3 News of the World to maintain as much secrecy as</p> <p>4 possible over the story?</p> <p>5 A. In what sense?</p> <p>6 Q. To ensure that it didn't leak out and possibly enable --</p> <p>7 or certainly enable, I can put it higher than that --</p> <p>8 Mr Mosley to take out an application for an injunction</p> <p>9 against the News of the World?</p> <p>10 A. Those decisions are made only by the editor.</p> <p>11 Q. That wasn't the question.</p> <p>12 A. Was I aware that he'd made that decision?</p> <p>13 Q. Yes.</p> <p>14 A. In other words, was I aware that we weren't going to go</p> <p>15 to Mr Mosley and put the allegations to him?</p> <p>16 Q. Mm.</p> <p>17 A. All I can say is I would always wait for an instruction</p> <p>18 from the news desk before revealing our hand, if you</p> <p>19 like, to anybody who was the subject of an investigation</p> <p>20 at the News of the World and I didn't receive the go</p> <p>21 ahead to do that. I would never ask to do it; I would</p> <p>22 wait to be told to do it, and on this occasion I wasn't</p> <p>23 told, therefore I assumed that had we weren't putting</p> <p>24 the allegations to him, but at no time was I told that</p> <p>25 we weren't.</p> <p style="text-align: center;">Page 85</p>	<p>1 well knew that if Mr Mosley was warned in advance of the</p> <p>2 story (a) he would make an immediate application for an</p> <p>3 injunction -- that's correct, isn't it?</p> <p>4 A. Yes, but this wasn't -- I was not part of that</p> <p>5 decision-making process.</p> <p>6 Q. You also knew that everybody at the News of the World,</p> <p>7 especially the editor, feared that the application would</p> <p>8 be successful; you knew that, didn't you?</p> <p>9 A. Again, that didn't come across my radar. I was not</p> <p>10 involved in that part of the decision-making process.</p> <p>11 Therefore, I didn't really need to consider it. What</p> <p>12 I had to consider was whether or not I had got what</p> <p>13 I was writing -- what I was writing in the paper was</p> <p>14 accurate. That was my task. These decisions as to</p> <p>15 whether or not it went on the website, whether or not we</p> <p>16 should confront Mr Mosley with the evidence did not come</p> <p>17 on my radar.</p> <p>18 Q. Hold on, Mr Thurlbeck. There was a cloak of secrecy put</p> <p>19 around this story.</p> <p>20 A. Yes.</p> <p>21 Q. Only a few people within the News of the World knew</p> <p>22 about it at all; is that correct?</p> <p>23 A. That is correct, but that wasn't unique. That happened</p> <p>24 on every story we did.</p> <p>25 Q. So we're agreed thus far. Are we also agreed that the</p> <p style="text-align: center;">Page 87</p>
<p>1 LORD JUSTICE LEVESON: Did you have a view about that?</p> <p>2 A. That I wasn't requested to confront Mr Mosley --</p> <p>3 LORD JUSTICE LEVESON: About whether Mr Mosley should be</p> <p>4 given the chance to deal with it in whatever way he</p> <p>5 thought fit?</p> <p>6 A. Well, my view at the time was that we had a perfectly</p> <p>7 legitimate story that we needed to run. Therefore,</p> <p>8 I would have taken the view that we had to protect that</p> <p>9 story and ensure that Mr Mosley didn't unjustifiably</p> <p>10 prevent us from running it.</p> <p>11 LORD JUSTICE LEVESON: What do you mean by the word</p> <p>12 "unjustifiably", please?</p> <p>13 A. Right. We firmly believed at the time that we had</p> <p>14 a story that was massively in the public interest. You</p> <p>15 might find that strange now, that this story has been,</p> <p>16 you know, rubbished on so many quarters, but all of us</p> <p>17 at the News of the World at the time, all of us, and</p> <p>18 many of us still --</p> <p>19 MR JAY: Do you mind answering the question, Mr Thurlbeck?</p> <p>20 A. I am answering it, I promise you. We thought we had</p> <p>21 every justification in running it and I imagine that the</p> <p>22 editor feared that this story could be prevented from</p> <p>23 coming out by Mr Mosley if we went to him. But I don't</p> <p>24 make the decisions. But that's what I imagine happened.</p> <p>25 MR JAY: It's a bit higher than that, Mr Thurlbeck. You</p> <p style="text-align: center;">Page 86</p>	<p>1 story came out in, I think, the second edition, no the</p> <p>2 first?</p> <p>3 A. I think that's correct, yes.</p> <p>4 Q. So this was all part and parcel of a strategy, is that</p> <p>5 right, to try and get this below the radar, which radar</p> <p>6 would include any antennae that Mr Mosley had available</p> <p>7 to him; are we agreed?</p> <p>8 A. Right. I will answer this question in this way: you're</p> <p>9 assuming that I'm part of this strategy, as you call it.</p> <p>10 I'm not. I'm not part of the strategy to upload the</p> <p>11 video onto the website, to decide whether or not we go</p> <p>12 to Mr Mosley with the evidence. I'm not part of that</p> <p>13 strategy. I am just a person who is writing the</p> <p>14 story -- investigating it, meeting the contacts, writing</p> <p>15 it and making sure what I write is accurate. Beyond</p> <p>16 that, the strategy is not mine.</p> <p>17 I can only make assumptions about what that strategy</p> <p>18 was and why, and you're asking me what that strategy</p> <p>19 was. I was never part of the discussions on that</p> <p>20 strategy.</p> <p>21 LORD JUSTICE LEVESON: Aren't you being a bit unkind to</p> <p>22 yourself, Mr Thurlbeck? You weren't just the reporter.</p> <p>23 You were the chief reporter for the paper, who had been</p> <p>24 the news editor, who had been the investigation news</p> <p>25 editor. You weren't party to any of this?</p> <p style="text-align: center;">Page 88</p>

<p>1 A. No, I wasn't. This was -- the strategy -- you might 2 find this hard to believe, but this is the way the 3 newspaper worked. I can only tell you what I know to be 4 true and what happened. 5 LORD JUSTICE LEVESON: That's all I ask. 6 A. And that's what I'm giving you, I promise you. This is 7 the way decisions were made. Decisions on whether or 8 not we'd confront people before we publish never ever -- 9 it was an editor's decision, always an editor's 10 decision. Not even the news editor's decision. 11 Especially not the chief reporter's decision. These 12 matters, the strategy, are all taken at the very highest 13 level on our newspaper, and I suspect on every other 14 newspaper in Fleet Street too. The chief reporter and 15 news editor, they're very grand-sounding titles but they 16 don't really call any shots at all. These decisions are 17 made at the very highest levels. 18 MR JAY: Is it your evidence, therefore, to this Inquiry 19 that you weren't even aware of what Mr Myler's decision 20 was? 21 A. In relation to what? 22 Q. The failure or rather the decision not to notify 23 Mr Mosley and get his comment before publication? 24 A. As I said to you before, I assumed that was his decision 25 because I'd been -- I hadn't been instructed to go and</p> <p style="text-align: center;">Page 89</p>	<p>1 reporter of the News of the World, the journalist who 2 wrote the story about Max Mosley's party with you and 3 your girls on Friday. Please take a breath before you 4 get angry with me!" 5 Do you know why that sentence was in the email? 6 A. I can't remember why. Now. 7 Q. Maybe it's obvious from what follows: 8 "I did ensure that all your faces were blocked out 9 to spare you any grief and soon the story will become 10 history, as life and the news agenda move on very 11 quickly. There is a substantial sum of money available 12 to you or any of the girls in return for an exclusive 13 interview with us. The interview can be done 14 anonymously and your face can be blacked out too. So 15 it's pretty straightforward. Shall we meet/talk?" 16 Then the following day another email: 17 "I'm just about to send you a series of pictures 18 which will form the basis of our article this week. We 19 want to reveal the identities of the girls involved in 20 the orgy with Max, as this is the only follow up we have 21 to the story. Our preferred story, however, would be 22 you speaking to us directly about your dealings with Max 23 and for that we would be extremely grateful. In return 24 for this, we would grant you full anonymity, pixelate 25 your faces in all photographs and secure a substantial</p> <p style="text-align: center;">Page 91</p>
<p>1 speaking to Mr Mosley. 2 Q. Okay. Let me ask you about what happened subsequently. 3 I think I can take this up in the judgment of 4 Mr Justice Eady at our page 31228. Still under tab 4. 5 The heading: 6 "Mr Thurlbeck's behaviour following publication on 7 30 March." 8 This, of course, deals with the follow-up story, 9 which I think in your statement you call part 2; is that 10 correct? 11 A. That's correct. 12 Q. That's common journalistic phraseology, maybe, in 13 relation to what follows the main story? 14 A. Yes. 15 Q. As Mr Justice Eady explains at paragraph 80: 16 "In order to firm up the story, therefore, 17 Mr Thurlbeck decided that he would like to publish an 18 interview with at least one of the participants and, if 19 possible, contributions." 20 Then he says: 21 "In pursuit of this objective, therefore, he sent 22 a number of emails." 23 And the emails went tout to Women A v B in these 24 terms: 25 "Hope you're well. I'm Neville Thurlbeck, the chief</p> <p style="text-align: center;">Page 90</p>	<p>1 sum of money for you. This puts you firmly in the 2 driving seat and allows you much greater control ..." 3 Et cetera. So it's pretty clear that there were two 4 choices available to the women. Either they agreed your 5 terms, which would involve anonymity, pixelation and 6 a sum of money, or they wouldn't be in the driving seat 7 and you would publish photographs with their faces; is 8 that correct? 9 A. That's correct. 10 Q. Can I understand, please, what your evidence to this 11 Inquiry is about these emails? Is it your evidence that 12 you didn't draft the emails? 13 A. That's true, yes. 14 Q. Who did? 15 A. The -- it was somebody on the news desk who had been on 16 holiday when the part 1 story was broken. When he 17 returned from holiday, he realised that he'd been on 18 holiday when, at that time, we believed we had one of 19 the biggest stories we'd broken for many years. He was 20 determined that in week two he would get a better story 21 than the part 1, and therefore we had to get the girls 22 on side to help us and to give us their testimony. 23 So it's true to say that those emails were dictated 24 to me. However, they were sent by me, and willingly, 25 and in my name. That was the process that we got to,</p> <p style="text-align: center;">Page 92</p>

<p>1 but ultimately I sent those emails, yes.</p> <p>2 Q. You had continuing carriage of the story?</p> <p>3 A. Yes.</p> <p>4 Q. And you were going to meet or talk with the women if</p> <p>5 they agreed to your terms; is that correct?</p> <p>6 A. That's correct.</p> <p>7 Q. So why would someone else have to draft emails for you</p> <p>8 as chief reporter, Mr Thurlbeck?</p> <p>9 A. No. I'm not -- I'm giving you the process that arrived</p> <p>10 at these emails being sent and I'm telling you exactly</p> <p>11 how it happened.</p> <p>12 Now, as to why it happened that way, you'd have to</p> <p>13 ask the person who dictated those emails to me.</p> <p>14 LORD JUSTICE LEVESON: Who is ...?</p> <p>15 A. He was a man on the news desk and I don't see that</p> <p>16 there's any benefit, surely, to me naming him, is there?</p> <p>17 MR JAY: You see, we could always ask him or require him to</p> <p>18 give evidence. Do you understand, Mr Thurlbeck, where</p> <p>19 this might be leading?</p> <p>20 A. All right. It was the news editor, who at the time was</p> <p>21 Ian Edmondson.</p> <p>22 Q. Okay. One theme which is coming strongly across, if</p> <p>23 I may say so, preparing for this week's evidence, is</p> <p>24 that he's getting blamed for everything, Mr Thurlbeck.</p> <p>25 The buck doesn't stop with Mr A -- in this case, you.</p> <p style="text-align: center;">Page 93</p>	<p>1 LORD JUSTICE LEVESON: I do, and it is relevant, isn't it,</p> <p>2 because if I am looking, as you well know, at the</p> <p>3 culture, practices and ethics of the press -- these</p> <p>4 aren't unthought-out approaches. These are clearly</p> <p>5 approaches that have been thought about.</p> <p>6 A. Yes.</p> <p>7 LORD JUSTICE LEVESON: And it's not just somebody who's</p> <p>8 knocked off an email. Did you discuss them with</p> <p>9 Mr Edmondson before --</p> <p>10 A. We had a brief conversation on the telephone about them</p> <p>11 and that was it.</p> <p>12 LORD JUSTICE LEVESON: So you decided with him -- I'm only</p> <p>13 trying to understand it.</p> <p>14 A. Yes.</p> <p>15 LORD JUSTICE LEVESON: And therefore I welcome your</p> <p>16 explaining the process because it's very important --</p> <p>17 that this was an appropriate approach to follow up the</p> <p>18 story?</p> <p>19 A. Yes, and I'm quite happy to accept for responsibility</p> <p>20 for this.</p> <p>21 MR JAY: Did you say to Mr Edmondson: "This comes close to</p> <p>22 threatening the women"?</p> <p>23 A. Um ... you see, what we were doing here is we were</p> <p>24 offering them -- in the course of normal journalistic</p> <p>25 practice, if you have a very good story and you want to</p> <p style="text-align: center;">Page 95</p>
<p>1 It's being passed to Mr Edmondson. Are you sure about</p> <p>2 this?</p> <p>3 A. What I'm saying to you -- this is the process that was</p> <p>4 involved in these emails being sent. But I did say --</p> <p>5 and I take full responsibility for this, and I did say</p> <p>6 to you just a minute ago that it was me who sent them,</p> <p>7 and I sent them in my name. I could have said no, and</p> <p>8 I didn't. I sent them. So I'm prepared to accept full</p> <p>9 responsibility for those emails being sent. I hope</p> <p>10 I make myself clear on that. I am not blaming anybody</p> <p>11 for these emails being sent. I am merely outlining the</p> <p>12 process involved.</p> <p>13 Q. Right, and it's a process which wasn't adumbrated to or</p> <p>14 in front of Mr Justice Eady when you gave your evidence,</p> <p>15 was it?</p> <p>16 A. No, no, it wasn't.</p> <p>17 Q. Why not, if it was the truth?</p> <p>18 A. I don't see any point -- I didn't see any point then in</p> <p>19 basically, you know, going into elaborate detail as to</p> <p>20 how these emails were sent, and perhaps I -- perhaps</p> <p>21 even now it's an irrelevance. I'm just giving you the</p> <p>22 benefit --</p> <p>23 Q. Can I ask what's the point now?</p> <p>24 A. I'm just giving you the process. If you don't want to</p> <p>25 know the process, then --</p> <p style="text-align: center;">Page 94</p>	<p>1 follow it up, you would seek to get more evidence about</p> <p>2 the story that you published the week before. On this</p> <p>3 particular week, it was, we believed, imperative to</p> <p>4 speak to the girls who were involved. We found out who</p> <p>5 they were, we identified them, and we were offering them</p> <p>6 an opportunity, if you like, to remove their identities</p> <p>7 from what would be a natural part 2. A natural part 2</p> <p>8 would be "Here are the girls, this is who they are", and</p> <p>9 in return for withholding their identities, we hoped to</p> <p>10 get a more detailed testimony from them. We didn't see</p> <p>11 it as a threat. We saw it as an offer -- a deal to do</p> <p>12 with the girls. In order for them to help us, we would</p> <p>13 respond by helping them too by removing that you are</p> <p>14 identities.</p> <p>15 Q. Two follow-up questions to that. Was this done in the</p> <p>16 course of normal journalistic practice, to use your own</p> <p>17 term?</p> <p>18 A. Was what done, sorry?</p> <p>19 Q. This sort of offer to the women concerned?</p> <p>20 A. Very seldom. I can't remember many occasions, but, you</p> <p>21 know, people would often be reluctant to help</p> <p>22 a newspaper because of their identities coming out, and</p> <p>23 often deals would be done to protect their identities.</p> <p>24 We would say, "Look, if you talk to us anonymously, then</p> <p>25 we can write a story about this." This happens all the</p> <p style="text-align: center;">Page 96</p>

<p>1 time. The broadsheet newspapers do this as well, you 2 know. I know -- they've spoken to me. They want to 3 speak to me and get my story and, you know, "We'll do it 4 off the record", and all the rest of it. TV stations 5 have done the same. This is the course of a normal 6 journalistic practice, if you like, offering people 7 a degree of anonymity in return for evidence that could 8 support a story.</p> <p>9 Q. Can I just explore, then, the value of the story if you 10 just printed the women's faces, if you'd just had their 11 photographs but no interview?</p> <p>12 A. Yes.</p> <p>13 Q. It was a useless story, wasn't it?</p> <p>14 A. Well, it wouldn't be as good, but it wouldn't be 15 entirely useless.</p> <p>16 Q. But you didn't in fact proceed down that road because 17 when the women concerned, to use the language of 18 Mr Justice Eady, resisted these blandishments, did you 19 publish a story with their faces exposed?</p> <p>20 A. No, we didn't, but again, that wouldn't be my decision. 21 That would be the editor's decision.</p> <p>22 Q. Because it was a useless story, wasn't it?</p> <p>23 A. I don't know what the reason was behind him not printing 24 the story.</p> <p>25 Q. It's pretty obvious it was a useless story and that's</p> <p style="text-align: center;">Page 97</p>	
<p>1 why it wasn't published. What you wanted was the much 2 better story, which it's true would involve pixelation 3 and an interview. That's what you really wanted?</p> <p>4 A. That's true, yes.</p> <p>5 LORD JUSTICE LEVESON: Choose a convenient moment, Mr Jay.</p> <p>6 MR JAY: Yes. I think we'll take it now.</p> <p>7 LORD JUSTICE LEVESON: Right. 2 o'clock, please. 8 (1.00 pm) 9 (The luncheon adjournment)</p> <p>10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 98</p>	

A	39:25	53:11	asked 7:23 29:22 57:11 58:1 75:1	awful 71:15 83:5	94:22	businessman 52:20,23
abide 48:18	advice 7:1 9:2 48:18	anybody 24:10 24:17 48:16	asking 15:13 47:2 88:18	B 90:23	best 2:5 52:3	Buts 67:11
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