

<p>1 Friday, 9 December 2011                  2 (10.00 am)                  3 LORD JUSTICE LEVESON: Yes, Mr Jay.                  4 MR JAY: I must apologise for the delay; it is entirely my                  5 fault.                  6 The witness today is Mr Richard Thomas.                  7 LORD JUSTICE LEVESON: Very good.                  8 MR RICHARD JAMES THOMAS (sworn)                  9 Questions from MR JAY                  10 MR JAY: Mr Thomas, please make yourself comfortable. Your                  11 full name, please?                  12 A. Richard James Thomas.                  13 Q. Thank you. Mr Thomas, you provided us with six witness                  14 statements. I'm going to identify what they are in                  15 a moment, but each one is signed and has a statement of                  16 truth and it constitutes your evidence; is that correct?                  17 A. Yes.                  18 If I could just start by apologising to the chairman                  19 and to everybody here for my non-appearance last week.                  20 My voice was non-existent last week. I appreciate it                  21 caused enormous inconvenience and I do apologise.                  22 LORD JUSTICE LEVESON: No apologies are necessary,                  23 Mr Thomas. It's obviously very important that you're                  24 fit and your evidence is clearly very important. Can                  25 I say that I'm very grateful to you for the obvious care</p> <p style="text-align: center;">Page 1</p>	<p>1 2011. It has exhibits RJT47 to 50. It will be in                  2 tab 53, I believe, of the file we have prepared for you                  3 and it deals with the detail of the 13,343 requests                  4 which were made of Mr Whittamore. We'll look at that in                  5 more detail in due course.                  6 Your third statement is dated 7 November 2011. It's                  7 tab 58 in that file. It deals with the position of the                  8 journalists, without, of course, naming any of the                  9 journalists, which policy we're going to continue to                  10 adopt, Mr Thomas.                  11 Your fourth statement is 21 November, paragraph 59,                  12 and that deals with Mr Owens' evidence, which you had                  13 seen his witness statement; is that correct?                  14 A. That's correct.                  15 Q. And it's your tab 59.                  16 Then there's the fifth statement of 27 November,                  17 tab 59A, which deals, if I can describe it in these                  18 terms, with Associated Newspapers' evidence; is that                  19 correct?                  20 A. That is correct.                  21 Q. And your sixth statement as recently as 6 December, with                  22 exhibits RJT51 to 54. This deals further with the                  23 evidence of Mr Owens. Is that correct?                  24 A. That is correct. If I could just explain that when                  25 I prepared my second, third and fourth witness</p> <p style="text-align: center;">Page 3</p>
<p>1 that you've taken in responding to the various requests                  2 that the Inquiry has made of you and producing these                  3 statements which form the basis of your account of these                  4 events. Thank you.                  5 A. Thank you, sir.                  6 Mr Jay, I have submitted six witness statements to                  7 the Inquiry. The first was one I think I put forward                  8 in September, a full statement --                  9 MR JAY: Just pause there, Mr Thomas. I want to identify                  10 them precisely and then we'll go through them. You're                  11 right; the first one you submitted, if I may say so,                  12 extremely timeously -- and it's a detailed statement --                  13 on 6 September of this year. It's tab 1, I think, in                  14 the main file you have there, and it has 46 exhibits; is                  15 that right?                  16 A. That's correct.                  17 Q. It sets out in your own words the narrative from between                  18 about 2002 to the present day, or probably more                  19 pertinently, to 2009 when you left the ICO's office; is                  20 that correct?                  21 A. It's correct in the sense I left in 2009. My first                  22 statement concentrated primarily on events leading up to                  23 the publication of the two reports by my office and the                  24 events following that.                  25 Q. Thank you. Your second statement is dated 16 October</p> <p style="text-align: center;">Page 2</p>	<p>1 statements, I had not then had the copies of the legal                  2 materials which you've received from my former office.                  3 Having received those, I prepared my sixth statement on                  4 Tuesday of this week.                  5 Q. Thank you.                  6 A. There's nothing inaccurate in my previous statements but                  7 my sixth statement elaborates some of the points made                  8 previously.                  9 Q. Mr Thomas, in order to make your evidence as sort of                  10 vivid and intelligible as we can, I'm not going to cover                  11 it quite in chronological order. I'm going to do it                  12 thematically, if I may.                  13 Before we start, may I invite you to tell us a bit                  14 about your career? This is paragraphs 1 to 2 of your                  15 first witness statement. On the unique reference                  16 numbers we're using, the last five numbers are 00258.                  17 In your own words, your career, Mr Thomas, in the law.                  18 A. Well, I'm trying to think. I was Information Commission                  19 from 2002 to 2009. Before that, I had been in various                  20 roles. I qualified as a solicitor in 1973. I trained                  21 and qualified at Freshfields. I spent three years                  22 there.                  23 I then went to the other end of the legal spectrum.                  24 I became the solicitor for the Citizens Advice Bureau on                  25 a full-time basis.</p> <p style="text-align: center;">Page 4</p>

<p>1 In 1979, I was the legal officer and then head of 2 public affairs for the National Consumer Council. In 3 1986 I was appointed as the director of consumer affairs 4 for the Office of Fair Trading. In 1992, I joined 5 Clifford Chance as their director of public policy, then 6 2002 -- November 2002 until June 2009 I was the 7 Information Commissioner. 8 Currently, I am the part-time chairman of the 9 Administrative Justice and Tribunals Council. I do that 10 about three days a week, and about three days a month 11 I'm a consultant to a think tank which is called the 12 Centre for Information Policy Leadership, based with 13 a law firm in the United States and I'm also -- I'm the 14 deputy chairman of Which? the consumer association. I'm 15 a trustee of the Whitehall and Industry Group and I'm 16 a member of the management board of the International 17 Association of Privacy Professionals. 18 Q. Thank you very much, Mr Thomas. Paragraph 5 deals with 19 the functions and role of the Information Commissioner. 20 This is 00258. You cover really two different and, in 21 one sense, antithetical functions. On the one hand, you 22 are concerned with privacy in the context of the Data 23 Protection Act, but on the other hand you are concerned 24 with the dissemination of information under the Freedom 25 of Information Act 2000. Is that correct?</p> <p style="text-align: center;">Page 5</p>	<p>1 activities on a public register maintained by my former 2 office. 3 Q. Yes. Under section 1, subsection 1 of the Data 4 Protection Act, a data controller -- you'll know this 5 off by heart but others will not necessarily -- is 6 a person who, missing out irrelevant words: 7 "... determines the purposes for which and the 8 manner in which any personal data are or to be 9 processed." 10 So that would cover media organisations, would it 11 not? 12 A. Indeed. 13 Q. Presumably it would cover personal data transmitted by 14 someone like Mr Whittamore to a media organisation? 15 A. I think it almost certainly would. I'd need to think 16 closely about that particular question, but one of the 17 points I should make is that the powers of the office in 18 relation to what I can broadly call the press were 19 really quite severely circumscribed, particularly by 20 section 32 of the Act, which disapplies in the effect -- 21 I'm using lay language, perhaps, but disapplies many of 22 the powers of the Commissioner where information is 23 being processed in most cases for the purposes of 24 journalism. That is an incredibly complicated part of 25 the Act. We could spend a lot of time looking at that.</p> <p style="text-align: center;">Page 7</p>
<p>1 A. Yes. When I started at the end of 2002, the Freedom of 2 Information Act had been passed but had not yet come 3 into force. It came fully into force on 1 January 2005. 4 But the functions under both acts have certain 5 circularities. I think they dovetail and are 6 complementary to each other. 7 The way that I commonly describe the various 8 functions is that the Commissioner is required under the 9 Acts to carry out various duties, and the language 10 I used was that we were partly a regulator, partly an 11 ombudsman, partly an educator and partly a policy 12 adviser. So we had a range of functions under both Acts 13 which were involving both regulation, dispute 14 resolution, education of both organisations and the 15 general public and also giving policy advice at the 16 national and at the international levels. 17 Q. You confirm -- and this is correct -- that you are not 18 a regulator of the press as such, nor do you have any 19 powers under RIPA; is that right, Mr Thomas? 20 A. No powers whatsoever under RIPA. Every media 21 organisation will be -- in the language of the Data 22 Protection Act will be a data controller. There's over 23 300,000 data controllers, and I think it's inconceivable 24 that any person involved in the media would not be 25 a data controller, so they would have to notify their</p> <p style="text-align: center;">Page 6</p>	<p>1 I don't think it's particularly relevant to most of the 2 issues which the Inquiry is examining but I do actually 3 have a cribsheet on section 32, if that would help the 4 Inquiry. 5 Q. May we attempt an overview of your powers. See how far 6 we get with this. 7 First of all, please, Section 55, which, sir, will 8 be found in Mr Graham's bundle under tab 62. It's 9 page 08053. I'll not going to spend very long on this, 10 Mr Thomas, but just so that we see the terrain. We've 11 seen Section 55 before with another witness. As you say 12 in your witness statement, this is the criminal 13 provision, of course. There are three possible actors: 14 the person who obtains, the person who discloses and the 15 person who procures the disclosure of information to 16 another person; is that right in broad terms? 17 A. Yes. Section 55 is really an entirely self-contained 18 part of the Act. Its origins go back to legislation 19 1994. There was a scandal involving Norman Lamont -- 20 Lord Lamont at the time. His credit card details became 21 available in the press and I understand there was 22 concern at that time and that led to an amendment, 23 I think, to the Criminal Justice Act of 1994 and that in 24 due course was transposed into the 1998 Data Protection 25 Act, so it's a self-contained part of the Act.</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 Q. Certainly. Mr Aldhouse told us about that and you're 2 absolutely right. There's just one point, though, 3 I need to raise with you on Section 55(1)(a). Would you 4 agree that one can obtain personal data through the use 5 of an agent? 6 A. I don't recall ever having that point discussed or 7 analysed inside the office. Certainly my understanding 8 of the conventional wisdom inside the office that 9 "obtain" meant more than just receive. It meant 10 actually seek out and obtain. 11 "Disclose" I think is self-evident, and primarily 12 where agents were concerned, I think we would be looking 13 primarily in terms of section 51(b), the procuring 14 element of Section 55. 15 Q. So a journalist then -- 16 A. I understand the argument. I'm simply saying that 17 primarily when we had -- I think you have to also recall 18 that the majority of the prosecutions we brought were 19 against people who had actually sought out and obtained 20 the information in that sense without the consent of the 21 data controller. I understand the point you're making. 22 I wouldn't like to make a definitive ruling here, nor am 23 I aware of any debate in the office on that particular 24 point. 25 Q. So a journalist who asked a private investigator to</p> <p style="text-align: center;">Page 9</p>	<p>1 A. That's correct. 2 Q. Did you ever provide guidance as to what it might mean? 3 A. In 2008, when there was a great deal of controversy 4 about the criminal justice and immigration bill, which 5 I'm sure we'll come onto later, at that time people were 6 saying, "We're not sure exactly what the public interest 7 means in this situation. You are the Commissioner. Can 8 you help us?" And we therefore drafted a draft 9 statement setting out what we thought the public 10 interest meant in those circumstances. I cannot recall 11 for sure whether that was ever published. I think it 12 was shared with some of the people we were talking to at 13 the time and it was certainly shared with, for example, 14 the minister of justice. But I -- for various reasons, 15 I don't think it was published. I'm not even sure 16 whether to this day it's been published. But there 17 is -- one of my exhibits does actually set out the draft 18 as it stood in early 2008. 19 Q. Thank you. We'll come to that exhibit, but I think 20 you're right in saying we've seen no evidence that it 21 was published. May I just delve into this public 22 interest point a little bit more? Would you agree that 23 there wouldn't be a justification in the public interest 24 if whoever it was was merely fishing for information 25 without having identified in his or her mind what the</p> <p style="text-align: center;">Page 11</p>
<p>1 obtain personal data and then receives it through the 2 agency of the private investigator, you don't think 3 clearly falls with Section 55? 4 A. I'm not saying one way or the other. I'm just not aware 5 of that one being tested in court or elsewhere. 6 LORD JUSTICE LEVESON: Normal principles of aiding and 7 abetting would probably work, in that he is also 8 obtaining it, but is what you're really saying that 9 because of 55(1)(b), the procuring offence, it may not 10 take the matter very much further? 11 A. Well, I have to speculate, sir, but when Parliament 12 drafted it in this particular way, I can only speculate 13 that they included the procuring offence within 14 Section 55 to cover the situation of where somebody got 15 someone else to obtain the information. But I don't 16 know. The point has not been tested. 17 MR JAY: The other point, please, on Section 55 is 18 Section 55(2)(d), which sets out a defence that in the 19 particular circumstances, the obtaining, disclosing or 20 procuring was justified as being in the public interest 21 There are really two points a that. The first is that 22 this is an objective test, is it not? 23 A. That is correct. 24 Q. Secondly, the public interest is not defined in the Data 25 Protection Act; is that correct?</p> <p style="text-align: center;">Page 10</p>	<p>1 public interest might be before starting on the 2 exercise? 3 A. I certainly agree with that as a broad proposition. One 4 would have to look at the circumstances of every case, 5 but the line that I took was that anybody who was 6 intending to rely upon that defence ought to be 7 absolutely clear as to why they were obtaining 8 information unlawfully -- which would otherwise be 9 unlawful. What would be their defence in public 10 interest terms? And the line I took in many, many 11 conversations was it would be important for the 12 journalist to record what he thought the public interest 13 was, to get advice from his legal advisers, authority 14 from his editor or his superiors and therefore anything 15 which was a pure fishing exercise prima facie was 16 certainly going to look as though it would be very 17 difficult to justify in public interest terms. 18 Q. Another general point. I appreciate that every case is 19 fact-specific, but some have said, "We need to contact 20 people in order to tell them what a story about them is 21 going to be and that we're about to publish that story." 22 Do you have a view as to whether obtaining information 23 of a confidential nature for that purpose would be 24 justified in the public interest? 25 A. Again, it's difficult to say without looking at the</p> <p style="text-align: center;">Page 12</p>

<p>1 particular circumstances of each case. I do understand 2 the need for journalists to seek to check their story 3 with those concerned. I do understand that there is 4 a public interest in freedom of expression which feeds 5 into the balance, but I think it would have to be 6 a difficult situation for someone to say that just to 7 find out the name or the telephone number or the address 8 of someone so they could talk to them would be a matter 9 of public interest. I'm not ruling it out, and indeed 10 if I can give an example which was within the Whittamore 11 papers -- I won't name names but I'll just give an 12 example. I think it was a fairly exceptional example. 13 It was where a minister had resigned from the Labour 14 government and his name was in the Whittamore papers. 15 This was after my time, but I understand that he got in 16 touch with my former office and said, "What's all this 17 about?" The office looked at the record in more detail 18 and it appeared in that particular situation the 19 journalist was trying to track down the minister to get 20 a statement from him as to why he had resigned over the 21 weekend. 22 Now, that might -- I'm not saying it was, but that 23 might be justifiable in public interest terms. But that 24 was exceptional. That was not the the sort of material 25 which we saw in the Whittamore papers.</p> <p style="text-align: center;">Page 13</p>	<p>1 A. Yes. This was the main formal power which the office 2 had where we felt that there was non-compliance with the 3 requirements of the legislation. We didn't use it that 4 frequently, but there was a power to serve an 5 enforcement notice on a data controller and that could 6 be challenged, but if it was not challenged, then in due 7 course it became a criminal matter not to obey the terms 8 of an enforcement order. So this was the main power 9 available to us as a regulatory body. 10 Q. Yes. It's the first of the powers under part 5 of the 11 Act, the heading "Enforcement", so it's the first of 12 your mainstream powers. Would it in principle cover 13 media organisations who are focusing data in 14 contravention of any of the data protection principles? 15 A. Yes, it would in principle, but then you have to look 16 very closely at section 32, which disappplies most of 17 the -- or many of -- most of the enforcement powers 18 where one is dealing with personal data which is being 19 processed for journalistic reasons, subject to the 20 detail of the law. 21 Q. That's right. We're not going to spend a huge amount of 22 time on section 32, owing to its complexity, but can 23 I just alight upon it if I may. This is our page 08029. 24 Just to see the consequences and the reach of the 25 provision. Do you have it to hand, Mr Thomas?</p> <p style="text-align: center;">Page 15</p>
<p>1 Q. That's helpful. The sanction, of course, when we're 2 looking at this version of the Act -- it's set out in 3 section 60, I think, not in Section 55, but looking at 4 the current state of the law, there's a limited fine if 5 it's trialled before the magistrates' court but there is 6 an unlimited fine if it's trialled on indictment; have 7 I got that right? 8 A. That is correct. 9 Q. Let me just touch on an ancillary power which arises in 10 the context of this specific criminal provision. Under 11 schedule 9 of the Act, the office has powers of entry 12 and inspection if it has reasonable grounds for 13 believing that an offence has been committed; is that 14 correct? 15 A. That's correct. 16 Q. But you need a warrant from a district judge? 17 A. Indeed, we had to go to a judge and get a warrant before 18 we could use those powers. 19 Q. If we touch on other powers which you have outside the 20 context of criminal sanctions. These are therefore 21 regulatory powers. Section 40 first of all, which is 22 our 08033. There's a power to serve an enforcement 23 notice, is that right, if you're satisfied that a data 24 controller has contravened or is contravening any of the 25 data protection principles?</p> <p style="text-align: center;">Page 14</p>	<p>1 A. I'm looking, if you'll excuse me, at both section 32 and 2 my cribsheet. This is incredibly complicated 3 legislation and I should also say that we rarely had to 4 engage with it in detail because the issues didn't 5 arise. 6 Q. Just to see the scope of the exception, under 7 section 32(1)(a), (b) and (c) as well, probably: 8 "Personal data which are processed only for the 9 special purposes are exempt from any provision to which 10 this subsection relates if the processing is undertaken 11 with a view to the publication by any person of any 12 journalistic, literary or artistic material." 13 So it has to be processing with a view to 14 publication. It can't be processing for some lesser 15 purpose; is that correct? 16 A. That is correct. I mean, if I can perhaps just take you 17 through my cribsheet, because it puts it in plain 18 language, or would you our rather go through it section 19 by section? 20 Q. I don't want to spend too much time on this. It's only 21 if you feel that by doing it in my way, as it were, 22 we're going to arrive at a misleading position. We can 23 see that (b) and (c) are cumulative requirements, so if 24 you don't fall within (a), you don't get off the ground. 25 But (b) is:</p> <p style="text-align: center;">Page 16</p>

<p>1 "The data controller reasonably believes that having 2 regard in particular to the special importance of the 3 public of interest in freedom of expression, publication 4 would be in the public interest." 5 So we're dealing always with publication. 6 A. Yes. 7 Q. And then (c): 8 "The data controller reasonably believes that in all 9 the circumstances, compliance with that provision is 10 incompatible with the special purposes." 11 So they're quite strict requirements and they're 12 tied in with publication. But if you do satisfy all the 13 requirements, all of the data protection principles are 14 disapplied apart from the seventh; is that correct? 15 A. And the seventh is security, keeping information secure. 16 Q. Secure in what sense? 17 A. One of the principles -- the seventh principle is that 18 data controllers have to take appropriate steps to keep 19 the information secure, stop it moving away from the 20 data controller, and that seventh principle is not 21 disapplied, but all the others are effectively 22 disapplied. 23 Q. I'm not going to go any further into section 32 -- 24 A. What I would just add to that, though: also disapplied 25 are the subject access provisions which give individuals</p> <p style="text-align: center;">Page 17</p>	<p>1 A. I think that's right, yes. 2 Q. Okay. The other enforcement powers, under section 43 3 you can serve an information notice, is that right, on 4 the data controller? 5 A. That's correct. 6 Q. That's our page 08039. You do that in order to 7 ascertain whether the data protection principles are 8 being applied with, don't you? 9 A. Yes. I mean, essentially to find out from the data 10 controller what is going on inside your organisation. 11 We very, very rarely had to use that power. I can't 12 think of any occasions I was personally involved in 13 where this power was used. The equivalent power was 14 used much more heavily in the Freedom of Information 15 Act, but we found in most cases just asking the data 16 controller to co-operate with us to supply information 17 was sufficient for our purposes. So we didn't, I think, 18 use that at all frequently. 19 Q. The last two provisions -- perhaps one of the most 20 important ones. Section 51, which is our page 08046, 21 your general duties: 22 "It shall be the duty of the Commissioner to promote 23 the following good practice by data controllers and in 24 particular so to perform his functions under this Act as 25 promote the observance of the requirements of this Act</p> <p style="text-align: center;">Page 19</p>
<p>1 the right to see their own data held by a data 2 controller. Also disapplied, the right to prevent the 3 processing of personal data in these circumstances, also 4 the rights in relation to automated processing and the 5 rights on rectification, blocking, erasure and 6 destruction. All those parts are disapplied and 7 I suppose the central message is that, reflecting the 8 requirements of the underlying directive, the hands -- 9 the application of the Data Protection Act to 10 organisations processing for these purposes was very 11 limited indeed. 12 Q. It's probably pretty obvious what the next question is 13 going to be but I'll ask it nonetheless. If 14 a journalist, for example, is obtaining information, 15 let's say, for the purposes of argument, merely to 16 contact someone who is about to be the subject of 17 a published story, that would not fall within 18 section 32, would it? 19 A. Well, almost certainly not, unless you could connect it 20 with the actual real prospect of a story being 21 published. 22 Q. The processing has to be with a view to the publication? 23 A. Indeed. 24 Q. If you're processing with a view to contacting someone, 25 that's outside section 32, isn't it, Mr Thomas?</p> <p style="text-align: center;">Page 18</p>	<p>1 by data controllers." 2 So that, as it were, is the cornerstone of your 3 role? 4 A. Indeed, that's the promotion of good practice. When 5 I referred earlier to our role as an educator, that 6 primarily flows from that particular subsection. 7 Q. Yes, that's section 51, subsection (2). This concerns 8 dissemination. 9 A. That's right, and we published a lot of materials, both 10 for data controllers and for individuals to raise 11 awareness of the requirements of the legislation. 12 Q. Thank you, and the final power, which may be quite an 13 exceptional power, is section 52. Section 52, 14 subsection (2), section 51 subsection (1) is a mandatory 15 duty: 16 "The Commissioner may, from time to time, lay before 17 each House of Parliament such other reports with respect 18 to those functions as he sees fit." 19 Am I right in saying that the two reports you 20 published in 2006 were under section 52 subsection (2)? 21 A. Yes, both those reports were laid before Parliament 22 using that power. It was the first time in some 20 23 years, I think, that the power had been used because 24 I think the equivalent power had been in the '84 Act and 25 my two predecessors had never seen fit or had never had</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 reason to lay reports before Parliament. But the two 2 reports, which we'll come onto later, were both laid 3 under that particular be subsection. 4 You say that's the only other part of the Act. 5 You've skipped over section 43, which is the power to -- 6 or the duty to respond to a request. Essentially that 7 is the dispute resolution, the complaint-handling part 8 of the office, and we had thousands of people who came 9 to us saying, "I think that someone has breached mile 10 rights under the Act, I want you to look at this", and 11 we had a large team of people who were investigating, 12 using the rather complicated but -- the request for 13 assessment of a process of section 43. 14 Q. Yes. May I go back to paragraph 10 of your first 15 witness statement. You tell us there that: 16 "Section 55 enforcement was the responsibility of 17 a small investigations team ... composed former police 18 and Customs officers ..." 19 Well, we've heard from one of them, of course. Did 20 you feel that the team was large enough for your 21 purposes at all material times? 22 A. I think we always felt that our teams were not large 23 enough. We felt underresourced. During my time, we 24 changed the funding arrangements for the office. When 25 I started, we received fees from data controllers when Page 21</p>	<p>1 a largely self-contained unit. They were in a different 2 building and they were almost semi detached from the 3 rest of the organisation, and I felt over time that not 4 only were they self-contained but to a large extent 5 self-governing and within about a year or so of my 6 arrival, I put changes in place to bring them much more 7 into the structure of the organisation. That led to the 8 creation of what became the regulatory action division, 9 and they then formed a much coherent part of the rest of 10 the organisation. 11 Q. You tell us in paragraph 11 of your first witness 12 statement that a Section 55 offence is often at least as 13 serious as phone hacking, owing to the nature of the 14 information which is being obtained. It might be highly 15 confidential information in general terms; that's right, 16 isn't it? 17 A. I would say that and I'd like to, I suppose, stress that 18 point. Obviously over the last few months I've followed 19 the concerns about phone hacking and during my time as 20 Commissioner, we didn't have any suggestion that there 21 was phone hacking going on in the way it's been revealed 22 in the last few months. But certainly we were very 23 concerned indeed about the security of personal data 24 held in many, many databases in the public sector, the 25 private sector and elsewhere, and we were very aware Page 23</p>
<p>1 they notified us and all that money had to be handed 2 across to the Treasury, and then we got a grant in aid 3 back. I wasn't happy with that situation and I felt 4 that the correct and better way of doing it was that we 5 should receive the money and fund the office from the 6 fees received, and that was changed about two years 7 after I started. And that did enlarge the resources 8 available to the office for data protection purposes, 9 but it was a pretty small team which was responsible for 10 investigations. 11 And I think as I said in my statement, there were 12 two main activities for that team: first of all, to 13 chase up cases of non-notification, which is also 14 a criminal matter -- if you don't notify when you're 15 supposed to notify, then that was investigated and the 16 team did that -- and also they were the team which were 17 charged with investigating Section 55 cases. 18 Q. Yes, and you tell us in your fourth witness statement at 19 paragraph 2 -- this is under your tab 59, our 20 page 33459 -- that the formal chain of command was that 21 Mr Owens, who I think was the senior investigations 22 officer, reported to Ms Jean Lockett, who reported to 23 Francis Aldhouse, who reported to you; is that correct? 24 A. That was the formal line of command, that's correct, but 25 I also go on to say that the unit when I arrived was Page 22</p>	<p>1 and -- a range of activities about the sensitivity of 2 very large amounts of personal data and the risks of 3 that getting into the wrong hands. And so I would 4 certainly express the view that information held in 5 databases, whether it's tax affairs, whether it's 6 financial affairs and the bank account, whether it's 7 medical records, social security records, your shopping 8 details held at a retailer, the records of telephone 9 companies, the records of -- education records, right 10 across the spectrum, public and private sector, we were 11 very concerned indeed that personal data should be 12 handled properly, and if there was unauthorised access 13 to such data, it's a matter we took extremely seriously. 14 Q. Thank you, Mr Thomas. You tell us in paragraph 12 that 15 when you started as Commissioner, you were briefed by 16 members of the investigations team of their belief that 17 there were extensive networks of private investigators 18 who were, I paraphrase, breaching Section 55. You touch 19 on that in your first report. 20 Were there any connections with media organisations 21 or were these briefings far more general? 22 A. They were general, but there was a background and I was 23 aware -- and I think it's in one of the witness 24 statements you've had from elsewhere -- that the office, 25 I think back in the mid-1990s, had taken action against Page 24</p>

6 (Pages 21 to 24)

<p>1 a private investigator who was supplying information to 2 media sources. There had been a case -- I think it was 3 in northwest London. The press release I hadn't seen 4 until last week, but the press release was from my 5 former office and it's in the bundle which you've 6 received from the Press Complaints Commission, and I was 7 aware of that as background.</p> <p>8 I was also aware -- and this happened in the first 9 two or three months of my time as Commissioner -- that 10 the Select Committee was holding the hearings looking 11 into these matters, and they are documented in the first 12 of our reports. If I can just draw attention to the 13 what was said there, which sort of set the background. 14 This is paragraph 4.10 of our report, "What price 15 privacy?" and this refers to previous press reports.</p> <p>16 The Guardian report in September 2002, indicating 17 a data black market and highlighting a private detective 18 agency which had been found to have sold information 19 from police sources to the News of the World, 20 Daily Mirror and Sunday Mirror.</p> <p>21 Second, a Sunday Telegraph report in December 2002 22 that private detectives routinely tapped private 23 telephone calls for the tabloid press, with some 24 agencies deriving the bulk of their income from such 25 work and such clients.</p> <p style="text-align: center;">Page 25</p>	<p>1 to chart the following course through your witness 2 statements just to see where your evidence leads.</p> <p>3 We know from other evidence that the search which 4 led to Operation Motorman took place on Saturday, 5 8 March 2003. Do you follow me?</p> <p>6 A. Yes.</p> <p>7 Q. I'm going to invite you now to jump through to exhibit 8 RJT51, which is to your sixth witness statement, which 9 is a file note, I believe, or a diary entry.</p> <p>10 A. I have the original books here, which may be helpful to 11 show it in context. RJT51?</p> <p>12 Q. Yes, thank you.</p> <p>13 A. Yes.</p> <p>14 Q. If we can frame it chronologically, you tell us that you 15 think this was completed on 10 March 2003, which was 16 obviously the following Monday; is that right?</p> <p>17 A. I can't be certain of that. It's simply a note in my 18 personal notebook of my tasks to do, various things for 19 my secretary with others in the office and there's 20 a note there which I -- it predates the page which is 21 dated 10 March 2003, which suggests that it either was 22 10 March or possibly the previous week, but I'm pretty 23 sure it was 10 March.</p> <p>24 Q. If Mr Owens' evidence is right -- and I'll come to it -- 25 it must have been before your meeting with him. Can we</p> <p style="text-align: center;">Page 27</p>
<p>1 A report in the Times of January 2003 that the 2 Inland Revenue's human resources director admitted that 3 there was evidence to show that some employees had sold 4 confidential information on tax returns to outside 5 agencies without identifying the agencies concerned.</p> <p>6 So that was background, if you like, from the time 7 before I started. As I was starting, the select 8 committee was looking at some of these matters, and this 9 was, again, recorded in paragraphs 4.7 to 4.9 of our 10 report, "What price privacy?"</p> <p>11 Q. I'll just give the page. 00298. It's under our tab 4.</p> <p>12 A. And if I can just -- yes, 4.11, we then sort of sum up 13 what was going on there and we say:</p> <p>14 "It's hardly surprising that the Select Committee 15 concluded that these intrusive methods of data gathering 16 amounted to 'a depressing catalogue of deplorable 17 practices'."</p> <p>18 And so I was aware both from my general knowledge as 19 to what I was being told when I arrived at the office 20 that when the team said, "We think there are networks of 21 people out there doing this sort of thing" -- that was 22 the sort of briefing which I was getting.</p> <p>23 Q. Thank you, Mr Thomas.</p> <p>24 Paragraphs 13 and 14 of your first witness statement 25 deal quite briefly with Operation Motorman. I'm going</p> <p style="text-align: center;">Page 26</p>	<p>1 just see what you say on RJT51? You've written: 2 "Francis [<u>underlined</u>] newspapers/[is that right?] 3 Section 55."</p> <p>4 A. That is correct.</p> <p>5 Q. What inference do you draw from that, trying to exclude 6 all subsequently acquired knowledge?</p> <p>7 A. That tells me that I needed to have a conversation with 8 Francis Aldhouse about newspapers vis-a-vis Section 55. 9 So something had triggered the need for me to have 10 a conversation with him about newspapers.</p> <p>11 Q. Yes. Do we draw the inference that you must have learnt 12 that this raid had taken place on 8 March before you 13 completed that note?</p> <p>14 A. I think that's very likely.</p> <p>15 Q. Yes?</p> <p>16 A. I mean, it is possible that I was told the previous week 17 that they were going to do the raid. I don't have any 18 clear recollection at all. But it was either it was 19 about to happen or had just happened.</p> <p>20 Q. "Appointment of AC"? What does that mean?</p> <p>21 A. Oh, that's appointment of assistant commissioner. We 22 were going to be appointing a new assistant 23 commissioner.</p> <p>24 Q. What about the last entry there, "Risk"?</p> <p>25 A. That was to do with the need for a new risk register for</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 the office to improve our risk management arrangements.</p> <p>2 Q. So it's irrelevant for our purposes?</p> <p>3 A. Indeed.</p> <p>4 Q. Why did you speak to Mr Aldhouse about this?</p> <p>5 A. I have no idea or recollection. I mean, simply, you</p> <p>6 know, he was my deputy and this was something which had</p> <p>7 come to my attention, but I can't help you, I'm afraid,</p> <p>8 beyond simply noticing it was on the radar at that time.</p> <p>9 Q. One reason might be that he was your deputy, it was</p> <p>10 a natural thing to discuss with him because after all,</p> <p>11 it was potentially an important issue?</p> <p>12 A. Oh yes.</p> <p>13 Q. I must ask you this general question, Mr Thomas.</p> <p>14 Presumably you have read the transcript of Mr Aldhouse's</p> <p>15 evidence?</p> <p>16 A. Yes.</p> <p>17 Q. Do you have any comment you would like to make about his</p> <p>18 evidence which might assist the Inquiry?</p> <p>19 A. Well, I think it's to summarise what he was saying that</p> <p>20 he was not heavily involved in these matters. Francis</p> <p>21 Aldhouse had been the Deputy Commissioner for some 18</p> <p>22 years when I started, and he was my deputy for about</p> <p>23 another two and a bit years until he took retirement.</p> <p>24 He had reached full retirement age. He was primarily</p> <p>25 focused on the policy aspects of data protection, both</p> <p style="text-align: center;">Page 29</p>	<p>1 pretty soon after the raid and it could even have been</p> <p>2 on 10 March.</p> <p>3 Q. The date isn't going to matter. Mr Owens put it a few</p> <p>4 days after the raid.</p> <p>5 A. At that time, they came to me and I think in my written</p> <p>6 statement to you, my first written statement, I said</p> <p>7 they came in with what I described as a treasure trove.</p> <p>8 I'm not sure whether that was their language or mine but</p> <p>9 it was certainly a wealth of material which they had</p> <p>10 seized.</p> <p>11 Q. And was Mr Aldhouse there? I think your evidence is</p> <p>12 you're not sure?</p> <p>13 A. I'm simply not sure.</p> <p>14 Q. Did Mr Owens demonstrate the audit trail, if I can so</p> <p>15 describe it, which led from the newspapers through the</p> <p>16 journalists to Mr Whittamore, Mr Whittamore's blagger,</p> <p>17 the target of the request, the nature of the</p> <p>18 confidential information obtained and then the fact that</p> <p>19 the newspapers were then invoiced and paid for that</p> <p>20 information? Did he, in general terms, demonstrate</p> <p>21 that?</p> <p>22 A. In general terms. I wouldn't use the language "audit</p> <p>23 trail", but in general terms the message was: there's</p> <p>24 a lot of material here which connects the various</p> <p>25 players together and I do recall -- I think I used it in</p> <p style="text-align: center;">Page 31</p>
<p>1 domestically and at the European level, and he didn't</p> <p>2 have very much of a hands-on operational engagement.</p> <p>3 One of the reasons I wanted to make some changes was</p> <p>4 that I felt there was a need to have a much more active</p> <p>5 style of management across the office, but I think</p> <p>6 Francis was somewhat disengaged on these matters. He</p> <p>7 wasn't excluded altogether, and there are some items of</p> <p>8 written evidence which show that he played a part in</p> <p>9 some of these matters, but it is also the case that he</p> <p>10 had had some sort of falling out with Alec Owens,</p> <p>11 some -- I think probably one, two years before</p> <p>12 I arrived, he had -- I think it was no secret across the</p> <p>13 office. He had issued a formal reprimand to Mr Owens</p> <p>14 and that had not gone down very well with Mr Owens and</p> <p>15 it was common knowledge there was not very good feeling</p> <p>16 between the two of them.</p> <p>17 Q. There was an informal meeting, is this right, where at</p> <p>18 least you were there and Mr Owens was there and possibly</p> <p>19 others were there a few days later? Are we agreed about</p> <p>20 that?</p> <p>21 A. Well, I can recall the meeting when Mr Owens and some of</p> <p>22 his colleagues came to me with cardboard boxes of</p> <p>23 materials, and this was clearly the stuff which had been</p> <p>24 seized. Whether that was on 10 March or whether it was</p> <p>25 some time later, I simply can't be sure, but it was</p> <p style="text-align: center;">Page 30</p>	<p>1 my witness statement -- the phrase "spider's web".</p> <p>2 There may have even been a diagram of some sort put up</p> <p>3 to show how they all linked together. So certainly that</p> <p>4 was the general message, that there was a lot of</p> <p>5 activity which began to show how the various players</p> <p>6 were interconnected.</p> <p>7 Q. And obviously you had a sense of the scale of the</p> <p>8 material, the use of the phrase "treasure trove", but</p> <p>9 did you also have as sense of the seriousness of all of</p> <p>10 this in terms of the nature of the confidential</p> <p>11 information which was in question?</p> <p>12 A. Yes, very serious, but alongside many other serious</p> <p>13 matters, if I can put it that way. I was dealing with</p> <p>14 a wide range of issues. It was serious, but I didn't</p> <p>15 have the sort of -- I don't want to give the impression</p> <p>16 that this was earth-stopping time, the entire office was</p> <p>17 suddenly focused on what had come out of this. This was</p> <p>18 something which was interesting. It indicated that</p> <p>19 their suspicions had been vindicated and would lead to</p> <p>20 prosecutions in due course.</p> <p>21 Q. Can I ask you, please, about your fourth witness</p> <p>22 statement, paragraph 3, which is our tab 59, page 33459.</p> <p>23 You really cover the first five lines. You say you</p> <p>24 recall congratulating Mr Owens and team for a job well</p> <p>25 done; is that right?</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)



<p>1 A. That's correct.                  2 Q. You don't recall any course of action being formally or                  3 informally recommended by Mr Owens or anyone else, let                  4 alone being bemused?                  5 A. That's correct. I certainly refute that. I don't think                  6 I'm a person do get bemused by anything, frankly, and                  7 I was interested in what they had found.                  8 Q. Then you say specifically:                  9 "I do not recall any proposal, on that or any other                  10 occasion, that any journalist, nor indeed any other                  11 customers of Steve Whittamore and his associates, should                  12 be investigated."                  13 Are you saying that the matter was simply left                  14 silent?                  15 A. Well, it was not a matter with which in any way I was                  16 engaged. I have absolutely no recollection whatsoever                  17 of discussing the investigation of journalists or                  18 instructing anyone one way or the other about the                  19 investigation of journalists. This was simply not in                  20 any way a matter with which I was involved or discussed,                  21 and I am pretty sure I would have remembered if I had                  22 been asked or in any way involved in that sort of                  23 activity.                  24 Q. Was it your expectation then that the investigation                  25 would take its own course, would follow the evidence</p> <p style="text-align: center;">Page 33</p>	<p>1 So your evidence is that you certainly don't recall                  2 Mr Aldhouse saying words to the effect: "We can't take                  3 on the journalists, they're too big for us"?                  4 A. I have no recollection at all of him or anyone else                  5 using that sort of language.                  6 Q. But in paragraph 4 you do recall -- I think that should                  7 say "us":                  8 "... being told that the materials which had been                  9 obtained would be evaluated so that appropriate                  10 prosecutions would follow where the evidence led."                  11 A. That's absolutely right.                  12 Q. Then this sentence:                  13 "The targets for prosecution were seen as                  14 Steve Whittamore, his three or four private investigator                  15 associates and the corrupt officials who were supplying                  16 confidential information."                  17 That suggests that there was some sort of confine or                  18 restriction on the targets and you wouldn't look wider                  19 to the journalists, doesn't it?                  20 A. I think you're reading too much into my language there.                  21 All I'm saying is that the team, as I understood it, had                  22 been investigating and had been prosecuting various                  23 people who were private investigators, and this was the                  24 main focus of that team's activities, and so either then                  25 or at some later stage, I can't recall -- but I mean,</p> <p style="text-align: center;">Page 35</p>
<p>1 where it led, and if journalists needed to be                  2 investigated, they would be?                  3 A. That's exactly right, Mr Jay. I mean, I was not                  4 involved in the detailed operational activity of that                  5 team. I had only been in the office some two or three                  6 months at that time. My understanding was that they                  7 would go ahead and do whatever needed to be done to                  8 bring the case forward.                  9 Q. Paragraph 3 continues, towards the end:                  10 "One of my central memories of that meeting is                  11 a recognition of the challenge presented for a very                  12 small team by the sheer bulk of the evidence, without                  13 any suggestion that even more should be obtained."                  14 So there was a concern that this was a -- or likely                  15 to be a substantial exercise for your team; is that                  16 correct?                  17 A. Yes. I think I was certainly given the very clear                  18 message that this was a lot of material there which                  19 would need going through in great detail, and I assumed,                  20 if that's the right word, that they would get on with                  21 the job.                  22 Q. I should deal with the final sentence of paragraph 3:                  23 "I do not recall whether Francis Aldhouse was at                  24 that meeting, but I do not ever recall hearing the words                  25 attributed to him."</p> <p style="text-align: center;">Page 34</p>	<p>1 that was the central thrust. I have, on many occasions                  2 on this, both for this Inquiry and in the discussions                  3 and debates of 2005, 2006, 2007, 2008, used the language                  4 that our targets were the investigators because they                  5 were the middlemen and I used the language we are, if                  6 you like, comparing them to the drug dealers. All I'm                  7 saying is that was not to exclude anybody else, but they                  8 were our central target.                  9 Q. Was not Mr Owens at least communicating to you his                  10 message: "Look, we have good evidence against everyone                  11 involved in this supply chain going right up to the                  12 journalists and to the newspapers; let's investigate                  13 them"?                  14 A. Well, that was never put to me. I don't recall him or                  15 anybody else saying, "We must go and investigate the                  16 journalists." It was simply: "Here is this mass of                  17 material. Let's go and see what we can make of it."                  18 Q. But the journalists were linked into the spider's web,                  19 as indeed were their employers, because the documentary                  20 evidence existed to tie them in, didn't it?                  21 A. Well, that's right, and when we come on to looking at                  22 the legal papers, either now or later, I mean, we'll see                  23 that clearly my legal team, who were increasingly on the                  24 lead on this, were very much keeping alive the option of                  25 prosecuting journalists, so I don't know if now is the</p> <p style="text-align: center;">Page 36</p>

<p>1 right time but we can go through the legal papers which                  2 show very clearly that throughout 2003, right through                  3 2004, even early 2005, the question of what to do with                  4 the journalists was a very live question.                  5 Q. In paragraph 6 of this witness statement at 33460 --                  6 this is set out in your third statement and you're                  7 repeating it here:                  8 "I do not have any recollection or awareness                  9 whatsoever of preventing any investigating officer or                  10 anyone else from interviewing any journalist or not                  11 allowing such interviews or further investigations."                  12 Is that correct?                  13 A. That's absolutely right and it's very important that                  14 I should refute this. I had neither the rationale nor                  15 the opportunity, and I certainly have no record, no                  16 memory whatsoever. It's not the sort of thing the                  17 Commissioner does, to say to people: "You must either                  18 investigate [so-and-so or such a class of person]", or                  19 not do so. This is an operational matter.                  20 Q. Unless, of course, you had made some sort of policy                  21 decision at an early stage not to pursue the                  22 journalists?                  23 A. There was no such policy decision, certainly not at the                  24 early stage. As we come on to the events of November                  25 2003, where we had received advice from our external                  Page 37</p>	<p>1 That's private investigators and their agents, so                  2 that is relevant to you. Then you say:                  3 "The much greater challenges in bringing                  4 a successful prosecution under Section 55(1)(b), which                  5 is the procuring offence."                  6 So aren't you saying there that certainly at the                  7 point when the initial charges were laid, you weren't                  8 aware that any consideration was actively given to                  9 prosecuting journalists?                  10 A. The word to emphasise in that sentence was "actively".                  11 I wasn't aware that anybody was actively considering one                  12 way or the other whether to prosecute journalists.                  13 I wrote that statement on 16 October. Since then,                  14 I have seen the file from our legal department which has                  15 come to light much more recently, and that shows that in                  16 fact active consideration was being given, because at                  17 the conference with counsel in October 2003, there was                  18 discussion about this matter. The in-house lawyer,                  19 there's an attendance note from her -- we'll come to                  20 that later -- which discusses the resource implications.                  21 I'm simply saying I wasn't aware of that when I wrote                  22 this statement. That remained the case.                  23 Q. Okay, well, we'll come to --                  24 A. Then I give my three -- (a), (b) and (c), they are my                  25 speculation, as it were, as to why that might have been                  Page 39</p>
<p>1 counsel about the cost and the resource implications of                  2 going further, that's when I went to the Press                  3 Complaints Commission. It is possible that Mr Owens has                  4 somehow confused or conflated all the dates and                  5 interpreted that as some sort of policy or some sort of                  6 instruction, but that was not the case.                  7 Q. Can I invite you, please, to look at your second witness                  8 statement, which is under our tab 53, and move to                  9 paragraph 14 of that witness statement, which is                  10 page 07723.                  11 The first sentence touches paragraph 6.8 of the                  12 report, which I'm going to deal with in a short moment.                  13 I'm more concerned with the second sentence, where you                  14 say:                  15 "In fact, I am not aware that any consideration was                  16 actively given to prosecuting journalists by the ICO or                  17 the CPS when the initial charges were laid. This would                  18 doubtless have reflected ..."                  19 And you set out three matters, the first of those                  20 which doesn't relate to the ICO:                  21 "The more serious matters of corruption on the part                  22 of various employees within the police, DVLA et cetera."                  23 (b):                  24 "The focus on those at the heart of the organised                  25 trade in confidential information."                  Page 38</p>	<p>1 the case.                  2 Q. Didn't those considerations which you set out under (b)                  3 and (c) -- we're not concerned so much with (a) -- apply                  4 at all material times and colour your thinking at all                  5 material times?                  6 A. I think I became more aware of the implications of this                  7 case towards the end of 2003, and that's when I went off                  8 to the Press Complaints Commission, but I can't really                  9 say that I was giving very active consideration to these                  10 matters, ie I don't think really until much later that                  11 I gave any sort of serious consideration to why it was                  12 that we weren't going for the journalists. I was at all                  13 times clear that, you know, the main focus of our case                  14 was to be focused on the middlemen who are organising                  15 the illegal trade.                  16 Indeed, if we come on to talk about the two reports                  17 my office published, that even then was still very much                  18 the focus of our reports.                  19 Q. We know as a fact, don't we, that the journalists were                  20 never interviewed by your office? Are we agreed about                  21 that?                  22 A. Yes, that's my understanding. I've discovered in the                  23 last two weeks that it appears to be the case that the                  24 Metropolitan Police did investigate four journalists.                  25 I don't know if you'd like to turn up --                  Page 40</p>

<p>1 Q. That's correct. That's in RJT49 and that was in the 2 context of Operation Glade.</p> <p>3 A. No, it's the materials you've received I think last week 4 from the -- my former office. If I can just turn up 5 that, because I think it does shed some light onto this.</p> <p>6 Q. We will come to it, but I want to be careful to 7 differentiate between what the police were doing as part 8 of their functions under Operation Glade and what you 9 were doing. Your office did not --</p> <p>10 A. You are taking me beyond my personal knowledge, but I, 11 at some point, became aware that in effect we'd handed 12 over the conduct of the case to the Metropolitan Police 13 because of the more serious matters of corruption inside 14 the police service itself, inside DVLA, inside telephone 15 companies, and for that reason, both the lead conduct of 16 the case and the evidence had been handed over to the 17 police and the Crown Prosecution Service.</p> <p>18 Q. I'm going to separate out, though, what the police were 19 doing under their general powers, enforcing the criminal 20 law, and what you were doing in relation to data 21 protection. The police were concerned with corruption 22 and that was the focus of Operation Glade. You had no 23 jurisdiction there, did you, Mr Thomas?</p> <p>24 A. Well, not jurisdiction, but I think -- my understanding 25 was that there was a feeling that we had to co-operate</p> <p style="text-align: center;">Page 41</p>	<p>1 Section 55, at the very least the journalists would have 2 to be interviewed in order to obtain sufficient 3 evidence; would you agree with that?</p> <p>4 A. I'm not sure. I'm not a criminal lawyer. I never 5 practised criminal law. I can't ever recall giving 6 serious consideration to that point until the last three 7 or four weeks, and I'm reading the papers, the advice 8 from our counsel. He says somewhere there is evidence 9 of criminal offences being committed by journalists, if 10 not others concerned in the media. So at that point, 11 which was October 2003, he was of the view that there 12 was sufficient evidence for prosecutions against 13 journalists.</p> <p>14 As I understand the criminal process, it will be 15 customary to at least seek an interview with 16 a journalist before bringing a prosecution, but that 17 would have been much later, as I understand it, in the 18 process. If there had been a decision that we were 19 going to prosecute a journalist, then at that stage we 20 might have sought an interview. We had no power to 21 compel them.</p> <p>22 LORD JUSTICE LEVESON: I'm not so sure about that, Mr --</p> <p>23 A. I'm out of my depth, not being a criminal lawyer, I'm 24 afraid.</p> <p>25 LORD JUSTICE LEVESON: Have you moved from March? Because</p> <p style="text-align: center;">Page 43</p>
<p>1 with those matters. They were, if you like, a much more 2 serious matter and in effect, I think -- and the 3 paperwork which I've now seen brings this out -- we were 4 in sort of second place, as it were, waiting for those 5 cases to be brought forward.</p> <p>6 Q. Whereas it is true that you were awaiting the result of 7 the prosecutions in Operation Glade, those matters were 8 outside the bailiwick of the ICO; are we agreed about 9 that?</p> <p>10 A. Outside the direct bailiwick, yes, but related.</p> <p>11 Q. Right.</p> <p>12 A. I've made the point many times that where you have 13 a Section 55 offence, there are going to be several 14 actors.</p> <p>15 Q. Yes.</p> <p>16 A. And if there is corruption and dishonest behaviour which 17 carries a stronger sentence, then it is inevitable, 18 I think, that the case will be handed to the police and 19 to the Crown Prosecution Service.</p> <p>20 Q. As regards data protection and Section 55, that was 21 solely within the jurisdiction of the ICO, wasn't it?</p> <p>22 A. Yes. I mean, the CPS can bring a prosecution, but we -- 23 very much our central responsibility.</p> <p>24 Q. So if your office was going to bring prosecutions 25 against journalists or their proprietors for breaches of</p> <p style="text-align: center;">Page 42</p>	<p>1 I have a question about March, if I could go back to 2 that. Is it convenient for me to?</p> <p>3 MR JAY: Yes.</p> <p>4 LORD JUSTICE LEVESON: But only if you've finished March.</p> <p>5 MR JAY: Yes, certainly. Carry on with March and then 6 I will --</p> <p>7 LORD JUSTICE LEVESON: I just want to ask one question, 8 because I am puzzled about something, Mr Thomas. You've 9 made it clear that you weren't really focused on whether 10 it should be journalists or newspapers that were 11 investigated; you just let Mr Owens get on with the job. 12 That's, I gather, what you've been saying this morning.</p> <p>13 But the very first word that you write down about 14 this enquiry, according to what you've told us this 15 morning, is the word "newspapers/Section 55", and I just 16 wonder whether that doesn't identify that you were very 17 clearly focused on newspapers, in other words what they 18 were doing --</p> <p>19 A. Yes.</p> <p>20 LORD JUSTICE LEVESON: -- from that moment. And if that is 21 right, I don't understand why that wouldn't be a matter 22 of great interest to you from that moment on.</p> <p>23 A. Well, you are right, sir. You know, clearly I was aware 24 that this was a matter which was serious and I was aware 25 that there were implications straight away of where this</p> <p style="text-align: center;">Page 44</p>

11 (Pages 41 to 44)

<p>1 might lead, but I think I'm saying that throughout 2003,                  2 from March 2003 right through until November, my                  3 assumption was that we'd be prosecuting wherever the                  4 evidence led, and I think probably my assumption was                  5 that we would be prosecuting the investigators and it                  6 was quite likely that we'd also be prosecuting the                  7 journalists.                  8 But what I am saying is I personally did not give                  9 any serious consideration to that matter, and I cannot                  10 recall any conversation or discussion when that                  11 particular issue was being discussed. So I have to                  12 speculate because my memory is not good enough, but my                  13 speculation is when I was told some time in October                  14 or November that it was going to be too expensive or too                  15 difficult to pursue the journalists, that's when I went                  16 off to the Press Complaints Commission. But throughout                  17 that period from March to October, as far as I was                  18 concerned, it was being handled in what I can broadly                  19 call the normal way by those who were charged with                  20 enforcing Section 55.                  21 LORD JUSTICE LEVESON: But I would have thought that if the                  22 ICO was going to have a go at newspapers or journalists,                  23 that has reputational risks of a monumental size and you                  24 would want to be kept informed. Is that not right?                  25 I mean, explain. Help me.</p> <p style="text-align: center;">Page 45</p>	<p>1 not doing so. I just made the assumption is that it was                  2 going to be pursued in the normal way.                  3 MR JAY: May I try and sum up the position in this way?                  4 Given two facts which we know, Mr Thomas -- the first                  5 fact is that the journalists were never interviewed by                  6 your office and the second fact is that such an                  7 interview would be a sinequa non to a prosecution, out of                  8 fairness to the journalists on the one hand, in order to                  9 obtain further evidence -- does it not follow that                  10 either there was a policy decision not to pursue that                  11 course or, alternatively, there were operational                  12 failures or decisions by the investigators not to carry                  13 out an elementary step, namely to interview?                  14 A. I don't think it's like that. If there was a policy, it                  15 was not one which I had any hand in, one which I knew                  16 about, which I made or which I was told about --                  17 Q. That's not quite an answer to the question. Does it not                  18 follow, either one or two, and then I'll allow you to                  19 say what you wish.                  20 A. I'm not sure even then it completely follows because --                  21 perhaps I'm wrong on this, but I mean, if there could                  22 have been interviews of journalists at a closer time to                  23 the actual prosecution, then is that not a third option?                  24 I don't know.                  25 Q. I don't follow it, Mr Thomas, at the moment. Is it not</p> <p style="text-align: center;">Page 47</p>
<p>1 A. There were many, many other matters going on at that                  2 time, sir. I've tried to make a note of some of the                  3 things. I was -- we had the major debate about identity                  4 cards just starting. I was seeking to reorganise the                  5 office at that time. We were establishing offices in                  6 Belfast, Edinburgh and Cardiff. Major preparations for                  7 freedom of information. A big programme to simplify our                  8 approach to data protection. A brand new employment                  9 code of practice which had been heavily criticised in                  10 the press and elsewhere. We had a major problem with                  11 bogus agencies, people purporting to be our office and                  12 receiving money from other organisations. We had an IT                  13 system which was causing us trouble, which was being                  14 installed. We had a major row with the audit commission                  15 about the way they were carrying out their functions.                  16 All I'm saying, sir, is that those were just some of                  17 the things I was dealing with. Yes, you're right to say                  18 at the back of my mind was the thought that we have                  19 a big case coming on here with the media. The evidence                  20 I gave you on Tuesday of this week records Jean Lockett                  21 coming to the September meeting of the senior management                  22 group and reporting then that things were happening with                  23 Operation Motorman and publicity could be expected.                  24 But at no time throughout this situation did I think                  25 we were either going to be prosecuting journalists or</p> <p style="text-align: center;">Page 46</p>	<p>1 either/or? If there's a third option, formulate the                  2 third option so that I can write it down and understand                  3 it, please.                  4 A. If a decision had been made that we were going to                  5 prosecute a particular journalist, then my understanding                  6 is that it would be necessary to interview that                  7 journalist before that prosecution were to be brought.                  8 Q. Yes.                  9 A. But I'm not convinced that had to happen in that period                  10 between March, when the raid had taken place,                  11 and October, when the discussion with the external                  12 lawyer took place about the prosecution of journalists.                  13 I can only rely on what I see in writing, but he says                  14 there there is evidence against journalists.                  15 Q. Normally an interview would be carried out, particularly                  16 if sufficient evidence existed, and we know that                  17 sufficient evidence existed in documentary form.                  18 A. Mm.                  19 Q. So at the moment I am thrashing around mentally to see                  20 what other alternative there might be beyond a policy                  21 decision on the one hand or incompetence in your                  22 investigation officers on the other.                  23 A. Well, if you want to put it in those terms, I have to                  24 put it to the latter, but I am absolutely -- you know,                  25 absolutely clear because I wouldn't have done any of the</p> <p style="text-align: center;">Page 48</p>

<p>1 things I had done right through 2005, 2006, 2007 if 2 I had thought at any time that I or anybody else had 3 said: "Back off the journalists." 4 Q. Some of the documents you've provided recently, very 5 recently. We're grateful for that. Can I just refer to 6 those quickly? RJT52, please, Mr Thomas. It's your 7 sixth witness statement. You put this forward as 8 suggesting, I think, that the prosecution of the 9 journalists had not been ruled out. Have I correctly 10 understood -- 11 A. Yes, I went through all my notebooks last week or the 12 beginning of this week for 2003, and there I found the 13 top half of that page are my notes of the meeting which 14 I had with the newspaper society. I see there that 15 I talked generally about data protection issues, 16 generally about freedom of information issues, and then 17 about Section 55, and -- it's on the screen, I think. 18 I haven't -- the screen's not working here, but -- 19 LORD JUSTICE LEVESON: Is it turned on? 20 A. -- I've got my own notebook. 21 MR JAY: It's working up there. 22 A. Well, I can't see it closely, but as long as you all 23 have it. 24 MR JAY: You have the original there, so you're in a better 25 position.</p> <p style="text-align: center;">Page 49</p>	<p>1 lawyers, I think, came on the scene a bit later. 2 Q. RJT53, while we're amongst these documents, towards the 3 bottom of the page. We're putting this in 4 around October, I think, 2003; is that right, Mr Thomas? 5 A. Yes, this would have been early October, from the 6 screens in my notebook. 7 Q. You draw to our attention four lines from the bottom: 8 "JL [this is Jean Lockett]: Motorman publicity 9 soon." 10 A. Yes, this is an example, where I actually made a note 11 that at the senior management group meeting, 12 Jean Lockett had come along and had said something about 13 Motorman and I had recorded it as "publicity soon". So 14 that does suggest that the matter was still very much 15 under active consideration, it does suggest that it was 16 going well as far as the office was concerned, and 17 suggests that the options of bringing successful 18 prosecutions were still very much there. 19 Q. It doesn't identify against whom -- 20 A. Exactly. 21 Q. Can we look at some of the legal advice? 22 I was thinking of breaking in about ten minutes, if 23 that's convenient. 24 We have this in a separate file. First of all, 25 we're going to look at the attendance note, meeting with</p> <p style="text-align: center;">Page 51</p>
<p>1 A. I have the original, yes. 2 Q. You say there -- 3 A. "Section 55, enforced law vigorously. Section 55, 4 breach of confidentiality, no new laws." 5 That was a meeting which I think was with David 6 Newell, who I had known previously, who was the Director 7 General of the newspaper society talking about life in 8 general, and my note there tells me that I was recording 9 there that we, if you like, had journalists in the frame 10 and that as of -- this would have been probably the 11 second half of June of 2003, I was conveying the message 12 to him that journalists were in the frame. 13 Q. You had hundreds of journalists, probably up to 400, in 14 your crosshairs at this point, but you weren't taking 15 any positive steps to enforce the rigorously against 16 them at that stage, were you? 17 A. As far as I was aware, my team were doing just that. 18 The matter was, you know, with my investigations team. 19 They were following up this mass of paperwork, and as 20 far as I was aware -- I would have had -- you know, we 21 had team briefings probably once a month and I would 22 have been kept very generally in the picture that the 23 case was proceeding. 24 Q. We'll come to the legal advice in a few seconds. 25 A. No, this is just the general investigators. The</p> <p style="text-align: center;">Page 50</p>	<p>1 counsel 3 October 2003. It's document 48710. In our 2 separate file, which is file 4 of 4, it's under tab 2. 3 This is a meeting with counsel in Birmingham which you 4 didn't attend. 5 A. That's right. It was attended by Karen Nolan, who was 6 the in-house lawyer, Alec Owens and Roy Pollit, who was 7 the other investigator. 8 Q. If you look at the paragraph between the two 9 holepunches, please, we learn that the Metropolitan 10 Police are currently looking at prosecuting Whittamore, 11 Boyall, Maskell and King: 12 "It appears that the charges that will follow are 13 corruption of a public official." 14 Do you see that? 15 A. Indeed. 16 Q. So you are quite entitled to point out -- therefore I'll 17 do it for you -- that the police were not, at that 18 point, considering prosecuting journalists, were they? 19 A. That absolutely appears to be the case. 20 Q. And you're entitled not only to make to point but to 21 underline it, I think, Mr Thomas, out of fairness to 22 you. 23 A. I've only seen this note in the last couple of weeks and 24 I perhaps haven't fully digested it, but that absolutely 25 appears to be the case, that the targets were the four</p> <p style="text-align: center;">Page 52</p>

13 (Pages 49 to 52)

<p>1 people mentioned.</p> <p>2 LORD JUSTICE LEVESON: Presumably you appreciated that at</p> <p>3 the time?</p> <p>4 A. Sorry?</p> <p>5 LORD JUSTICE LEVESON: When the prosecution started, there</p> <p>6 were no journalists there. Did you not think about</p> <p>7 that?</p> <p>8 A. I wasn't involved in these meetings.</p> <p>9 LORD JUSTICE LEVESON: No, no, no, not the meetings, but you</p> <p>10 were alert as to what was going on with the prosecution</p> <p>11 process?</p> <p>12 A. Only in very general terms and I have no recollection.</p> <p>13 Perhaps we'll come on, sir, to talk about what happened</p> <p>14 in November. This is in October. But what seems to</p> <p>15 have happened in November is that almost certainly Karen</p> <p>16 Nolan came to me and said, "It's not going to be</p> <p>17 possible to prosecute the journalists."</p> <p>18 MR JAY: We'll see that in a few moments.</p> <p>19 A. We're jumping ahead a bit, perhaps.</p> <p>20 Q. We have already looked at the document with Mr Owens,</p> <p>21 but we see it towards the bottom of 48710, the sort of</p> <p>22 evidence that at that stage existed in relation to</p> <p>23 illegal activity. Do you follow me, Mr Thomas?</p> <p>24 A. Yes, yes.</p> <p>25 Q. On the next page, 48711, under the heading where</p> <p style="text-align: center;">Page 53</p>	<p>1 from this point onwards counsel was advising: it's going</p> <p>2 to be a very, very expensive and risky business for the</p> <p>3 office to go -- but that was -- what I'm trying to</p> <p>4 say -- and I hope I'm coming across very clearly -- is</p> <p>5 there was no policy from the outset that we weren't</p> <p>6 going to go against the press.</p> <p>7 Q. Are you sure about that, Mr Thomas? Counsel obeys</p> <p>8 instructions. Counsel does not set out what policy</p> <p>9 should be. Counsel doesn't know what your resources</p> <p>10 are. Isn't he there --</p> <p>11 A. Well, he's --</p> <p>12 Q. Isn't he there merely reflecting what he's been told in</p> <p>13 his instructions?</p> <p>14 A. Well, I don't see it that way and I don't know who could</p> <p>15 have given him that instruction. It didn't come from</p> <p>16 me. It didn't come from anything of which I had any</p> <p>17 awareness whatsoever.</p> <p>18 LORD JUSTICE LEVESON: Then it might just be wrong?</p> <p>19 A. Who might be?</p> <p>20 LORD JUSTICE LEVESON: Well, it might be wrong.</p> <p>21 A. I think, sir, the way I've read this is that he's</p> <p>22 saying, "You could go against the press, but it's going</p> <p>23 to be not favourable because of the financial aspect.</p> <p>24 It's going to, you know, cause such an impact on your</p> <p>25 resources that it would not be realistic." He could be</p> <p style="text-align: center;">Page 55</p>
<p>1 counsel's name is set out:</p> <p>2 "With regard to the prosecution of the press,</p> <p>3 although there is evidence to support a prosecution,</p> <p>4 a prosecution would not be considered favourable because</p> <p>5 of the financial aspect."</p> <p>6 That could be read in one of two ways. Either it</p> <p>7 could be counsel's view, or it could be counsel</p> <p>8 reiterating what his instructions were. Do you see</p> <p>9 that?</p> <p>10 A. Well, I have read this in the former way. That was him</p> <p>11 expressing a view.</p> <p>12 Q. But would it be counsel's business to address the</p> <p>13 financial aspects? Those are policy matters for your</p> <p>14 office, aren't they?</p> <p>15 A. Well, I certainly had never read it in the way you're</p> <p>16 now suggesting and nor do I do so now, because as far as</p> <p>17 I'm aware, there was absolutely no such policy and</p> <p>18 I can't think why there would have been such a policy.</p> <p>19 What I think comes very clear to me, frankly, was that</p> <p>20 it was the sheer cost and logistical challenge of going</p> <p>21 against the press which meant that we should concentrate</p> <p>22 on the investigators.</p> <p>23 MR JAY: You're, in effect, by that answer endorsing the</p> <p>24 policy. It was the sheer scale of --</p> <p>25 A. Oh, that came later. I mean at this point -- I think</p> <p style="text-align: center;">Page 54</p>	<p>1 saying that. I mean he was a counsel, I believe, who</p> <p>2 we'd used regularly. He knew what limited resources we</p> <p>3 had. So I'm only speculating now, but it seems to me he</p> <p>4 was saying, "Do you really want to go against the press</p> <p>5 when you're going to see the implications of -- when</p> <p>6 you're going to see the cost of doing so? Let's go for</p> <p>7 our main targets."</p> <p>8 MR JAY: But if all one needed to do: "Let's cherry pick the</p> <p>9 best cases of illegality. The friends and family cases,</p> <p>10 the one or two police national computer cases. We'll</p> <p>11 interview the journalists in those cases. We might</p> <p>12 interview the editors."</p> <p>13 That is a fairly narrow exercise. You can then</p> <p>14 assess how strong the case is. After all, if the</p> <p>15 evidence is strong enough, you might even get guilty</p> <p>16 pleas. Who knows? But isn't this, on any view, jumping</p> <p>17 the gun?</p> <p>18 A. Well, by whom?</p> <p>19 Q. By your office, I would suggest.</p> <p>20 A. Well, because -- no --</p> <p>21 Q. Who put the idea in counsel's mind.</p> <p>22 A. I think -- as I read this, the thought is -- came from</p> <p>23 counsel. But I also turn up, a few days later, the</p> <p>24 telephone --</p> <p>25 Q. Yes, this is tab 3, 20 October 2003, page 48714. You're</p> <p style="text-align: center;">Page 56</p>

<p>1 going to refer to item 4 at the bottom of the page, 2 aren't you?</p> <p>3 A. That's the one, yes, where Karen Nolan, the in-house 4 lawyer, is discussing with Bernard Thorogood, the 5 counsel -- shall I read it out?</p> <p>6 "Prosecution of the press. The scale of the case 7 requires substantial manpower. Several cases and the 8 cost will be excessive, both to investigate and to 9 prosecute."</p> <p>10 So there is a conversation going on between the 11 in-house lawyer and the external counsel which, again, 12 explores the realistic prospect of being able to go 13 against the journalists.</p> <p>14 Q. Your evidence is that the policy steer didn't come from 15 you?</p> <p>16 A. Absolutely not.</p> <p>17 Q. Okay.</p> <p>18 A. I'm jumping ahead again, but in November, clearly when 19 this was brought to my attention, I was of the view: "We 20 can't leave it there. I just have to go and do 21 something about this." That's why I wrote to his 22 Christopher Meyer -- we'll come to that letter -- and 23 was very concerned that we should not let the press off 24 the hook.</p> <p>25 Q. Yes.</p> <p style="text-align: center;">Page 57</p>	<p>1 there's plenty of good evidence against the journalists, 2 isn't he?</p> <p>3 A. Yes, indeed. I made that point.</p> <p>4 Q. Then he says, the third line into 48718:</p> <p>5 "I understand that policy considerations [that 6 should say] have led to their view [might be 'your 7 view', 'the view'] that enforcement of some sort rather 8 than prosecution is the way forward in respect of the 9 journalists/newspapers. I understand and sympathise 10 with that approach. This is, I believe, the first 11 occasion upon which the scale of the problem has come to 12 light, and it may not be unreasonable to give the Press 13 Complaints Commission the chance to put their house in 14 order."</p> <p>15 "Policy considerations" there lead straight back to 16 you, don't they?</p> <p>17 LORD JUSTICE LEVESON: Or your office, to be fair.</p> <p>18 A. Thank you, chairman, because I -- can I say this very 19 clearly: I take absolutely full responsibility for 20 everything that happened on my watch. I was the 21 Commissioner. Everything that happened, I take 22 responsibility. But I have to distinguish a little bit 23 between the Commissioner who is a corporation's soul in 24 the language of the Act and the Commissioner, 25 Richard Thomas, who is the individual. I'm trying to be</p> <p style="text-align: center;">Page 59</p>
<p>1 A. What I'm really saying, I suppose, is I'm being told, it 2 appears: "We can't go against the press", and I'm 3 responding: "We can't let the press off the hook. We 4 need to do something about this." And then the next two 5 or three years followed that.</p> <p>6 Q. But there is an intervening piece of evidence, namely 7 counsel's opinion of 22 December --</p> <p>8 A. No, that came some two, three weeks later.</p> <p>9 Q. Yes, but let me just look at this before we look at the 10 PCC, because it's convenient in this stream of --</p> <p>11 A. Well, I do just have to emphasise that that's 12 22 December and I had written to Sir Christopher Meyer 13 in November and had had two meetings with the PCC by the 14 time of this written advice.</p> <p>15 Q. I promise you, Mr Thomas, we are going to look at --</p> <p>16 A. I'm sure we are, but I wanted to get absolutely clear 17 that -- it's important, I think, to see this written 18 advice in context.</p> <p>19 Q. First of all, Mr Thomas, we can see when it was dated. 20 Did you see the advice shortly after it was given, 21 allowance being made for the Christmas holiday?</p> <p>22 A. I have no recollection of seeing this advice at any time 23 until the last couple of weeks.</p> <p>24 Q. Paragraph 5, page 48717. I've read this out before, so 25 no need to read it out again. Counsel is saying that</p> <p style="text-align: center;">Page 58</p>	<p>1 as helpful as I can to this Inquiry by sharing with you 2 my personal involvement in various matters.</p> <p>3 When you have a large organisation or large-ish 4 organisation, a lot of things go on which you don't 5 personally know about the detail. So when Mr Jay 6 expresses some surprise, perhaps, that I hadn't seen 7 this written advice, that's not a particular surprise to 8 me because you delegate, you let people get on with 9 their particular responsibility.</p> <p>10 Q. That wasn't really my point. It's from where the policy 11 considerations --</p> <p>12 A. Yes, well, "policy" is a loose word.</p> <p>13 Q. Can I make it explicit? We know that by the time this 14 advice was written, you had already written to 15 Sir Christopher Meyer, you'd had a meeting with him on 16 27 November, so given that that was the policy steer you 17 were taking --</p> <p>18 A. But --</p> <p>19 Q. -- by the objective facts demonstrates that the policy 20 considerations referred to here were your policy 21 considerations, weren't they?</p> <p>22 A. I'm obviously more involved in the situation from this 23 point onwards, but let me say, your know, there is clear 24 evidence that there was not a policy conclusion even at 25 that point.</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 My letter to Sir Christopher Meyer says the 2 possibility of prosecuting journalists is still under 3 consideration. His letter to the Times yesterday says 4 that I went to him and I said that prosecutions were 5 likely. I can't recall if that's right or not, but it's 6 clear to me that when I saw him that the possibility of 7 prosecuting journalists was still alive, and therefore 8 it is not the case and certainly was not anyone's policy 9 that we were not going to prosecute journalists. 10 And if you look at the papers right through into 2004, 11 that option, the possibility of prosecuting journalists, 12 was very much kept alive.</p> <p>13 Q. But it's not -- 14 A. So -- 15 Q. It's put on ice here, if not in permafrost, isn't it, 16 Mr Thomas? 17 A. I think you're reading too much, frankly, into that 18 phrase, "policy consideration". You're rather assuming 19 that there's some sort of holy writ somewhere and this 20 is the policy. That's not the way my organisation 21 worked and certainly was not the case in this particular 22 circumstance. 23 Q. This is my last question before we break. Your concern 24 was: "Look, if we pursue powerful people, namely media 25 groups and journalists, it's going to cost us a lot of</p> <p style="text-align: center;">Page 61</p>	<p>1 the view that to ..." 2 Can I just look it up? I think it's important to 3 get those particular words. It's my exhibit RJT3, 4 I think. 5 LORD JUSTICE LEVESON: 3? 6 A. Yes, my letter, sir, to Sir Christopher Meyer, 7 4 November. The letter had been drafted for me, but 8 it may have had some amendment. But towards the end of 9 that letter on the second page -- do you need time to -- 10 LORD JUSTICE LEVESON: No, I have it. 11 A. If you read the penultimate paragraph, sir, I mean, 12 that, I think, puts the context clear. 13 LORD JUSTICE LEVESON: It's 00361? 14 A. 361, yes. Shall I read it out? 15 "I am considering whether to take action under 16 the Data Protection Act against individual journalists 17 and/or newspapers. My provisional conclusion, however, 18 is that it would be appropriate first to give the Press 19 Complaints Commission and its code committee the prior 20 opportunity to deal with this issue in a way which will 21 put an end to these unacceptable practices across the 22 media as a whole. This could involve, subject to 23 suitable safeguards, providing you with some of the 24 evidence that our investigations have revealed. 25 Following your review of such material, I anticipate</p> <p style="text-align: center;">Page 63</p>
<p>1 money. It's risky. The better course is to involve the 2 PCC, politically or more generally, rather than go under 3 Section 55." That was your thinking, wasn't it, by this 4 stage? 5 A. I want to be absolutely as helpful as I can and I have 6 to distinguish between my memory and my speculation, and 7 I've asked myself: what was it that made me go to the 8 Press Complaints Commission at that particular point? 9 And my speculation -- I can't recall precisely -- is 10 that the lawyers had reached that particular point with 11 the external barrister. We'd had -- they'd come to 12 brief me and say, "It looks like it's going to be 13 extremely difficult to go against the journalists. 14 We're going to go against the investigators." I would 15 have said something like: "We can't leave it there. We 16 must do something." 17 The letter which I sent to Sir Christopher Meyer was 18 actually -- it was drafted for me by somebody else 19 because I've noticed there's a reference which shows it 20 wasn't all my own handy work. So clearly a view was 21 taken: let's see where we get with allowing the Press 22 Complaints Commission to put their house in order. And 23 I think I do stand by what is said in that letter -- 24 I don't have it right in front of me now, but towards 25 the end of that letter, it says something like: "I'm of</p> <p style="text-align: center;">Page 62</p>	<p>1 this would lead at least to a revision of the code. The 2 approach I have in mind would be consistent with the 3 recommendations of the Select Committee which were 4 addressed to our respective organisations and could 5 provide a more satisfactory outcome than legal 6 proceedings. I believe that approach would also be 7 consistent with your express wish to demonstrate the 8 PCC's effectiveness." 9 Now, that is where I stood, being pulled into this 10 in November -- early November 2003. So in effect, what 11 I'm being told is: it's going to be very, very difficult 12 to pursue the journalists. I'm saying, "I'm not 13 prepared to leave it there. Let's keep open the option 14 of the journalists but let me write to the PCC. " 15 That letter, I think, fairly records the situation 16 as it was at that time, and I would suggest that is not 17 consistent with a -- what you call a grand policy that 18 we're not going to go after the journalists. 19 MR JAY: I see that, Mr Thomas. Thank you very much. 20 I think that might be a convenient moment. 21 LORD JUSTICE LEVESON: Very good. We'll have five minutes 22 (11.36 am) 23 (A short break) 24 (11.42 am) 25 MR JAY: Mr Thomas, certainly by the time counsel's advice</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)



<p>1 was given on 22 December 2003, in line with the 2 direction your office was going, there was no question, 3 was there, of interviewing journalists for the purpose 4 of any possible criminal prosecution? 5 A. That seems right. 6 Q. We learn a little bit more about your thinking from your 7 fourth witness statement, which is under our tab 59, 8 paragraphs 7 and 8, which is on page 33460. That's 9 halfway through paragraph 7. Are you with me, 10 Mr Thomas? You say: 11 "Although I cannot recall any discussion then or 12 later about the actual possibility of prosecuting any 13 journalists, I think that a more general understanding 14 developed that the office would see how the case against 15 the investigators and public officials turned out before 16 actively considering any further enforcement action. 17 I was also conscious that taking action against 18 journalists would be a major logistical, evidential and 19 legal challenge ..." 20 I'll come back to that. 21 "... would almost certainly be strongly resisted and 22 would be very expensive for an offices with very limited 23 resources." 24 Setting aside the cost, of course, counsel was 25 advising on 22 December 2003 that on the face of it, you</p> <p style="text-align: center;">Page 65</p>	<p>1 this material to put a stop to these practices in the 2 press by other means. 3 I have to say -- and perhaps this is the chance to 4 say this -- I think the steps we did take I think 5 were -- alongside other events, were in fact effective 6 at reducing, if not eliminating, this sort of activity, 7 and I have to say -- and maybe this is with hindsight, 8 but perhaps thank goodness we did not prosecute the 9 journalists. The impact for the office would have been 10 very, very demanding indeed. 11 I don't know when this was or at what point this 12 was, but probably around about 2007, I can recall 13 a conversation along the lines of somebody saying, 14 "Thank God we didn't take the journalists to court. 15 They'd have gone all the way to Strasbourg." In other 16 words, they would have challenged any action we would 17 have taken, we would have gone right to Strasbourg, the 18 Court of Human Rights, Article 10 issues coming in. 19 We'd seen all the material being throwned at us during 20 "What price privacy?" and the bill. 21 When I also look at the note of counsel in 2004, 22 where he records that the police had investigated 23 journalists -- I think I ought to read out that 24 particular paragraph because I think it shows the sort 25 of situation we would have been up against. This is</p> <p style="text-align: center;">Page 67</p>
<p>1 had a good case, wasn't he? 2 A. I wrote that statement, paragraph 7, before seeing the 3 legal papers. 4 Q. Fair enough. 5 A. But I believe the legal papers actually endorse that. 6 When I talk about a general understanding developing, 7 I think the papers right through 2003, 2004 bear out 8 that approach, that clearly it was -- there was 9 awareness as to what would be involved in prosecuting 10 journalists and -- I'm not sure if you want to go onto 11 that later but the paperwork from 2004, I think, is 12 entirely consistent with what I say there. 13 Q. Yes. 14 A. I will actually go on to paragraph 8 of that statement, 15 which -- 16 Q. The question actually was: counsel was advising that on 17 the face of it you had a good case. That's what he 18 said, wasn't it? 19 A. Yes, indeed, but, you know, you don't prosecute every 20 case. We had a phrase in the office, you know, "you 21 have to be selective to be effective", and no doubt, you 22 know, having regard to the very limited resources, the 23 advice was it's not wise to go ahead with this case when 24 we can have the impact against the investigators -- and 25 we'd hope to get a good result there -- and we can use</p> <p style="text-align: center;">Page 66</p>	<p>1 document 48761 and I would like to read this out. 2 Q. Yes. 3 A. This is a conference with counsel. On this occasion 4 in January 2005, I was there for part of the meeting -- 5 in fact, the part where this paragraph crops up. If 6 I could read paragraph 9. 7 Q. Yes? 8 A. "BT [that's Bernard Thorogood, the outside counsel] 9 stated that he'd asked counsel in the London case 10 [that's the CPS prosecution, Operation Glade] how the 11 officers in that case had approached the issue of the 12 journalist [I think that's probably meant to be 13 'journalists' plural]. London counsel indicated that 14 the journalists were interviewed and were found to be 15 tricky, well armed and well briefed, effectively 16 a barrel of monkeys." 17 Now -- 18 Q. That cuts a number of ways, doesn't it, Mr Thomas? 19 A. It does, but that is what was being said at that time. 20 Q. Then in paragraph 10, Article 10 issues are addressed, 21 aren't they? 22 A. Exactly that. So I am saying that increasingly -- and 23 I think this came much later in time -- that I was of 24 the view: thank goodness we had not prosecuted 25 journalists because of some of the problems that we</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 would have encountered.</p> <p>2 Q. Even if you'd kept to the police national computer</p> <p>3 cases, the family and friends cases? Can you imagine</p> <p>4 what sort of public interest defence might have been</p> <p>5 risibly raised in that context? Family and friends?</p> <p>6 A. Well, I have to look at it from all points of view,</p> <p>7 I suppose, but I can see that the media would not like</p> <p>8 any of their journalists being prosecuted and I suspect</p> <p>9 they would, for example, argue there's a public interest</p> <p>10 in being able to ensure freedom of expression.</p> <p>11 Now, I don't believe that, I don't accept that, but</p> <p>12 I -- it's one thing as to whether or not that would be</p> <p>13 successful, but one can anticipate that that sort of</p> <p>14 point would have been raised and it would have engaged</p> <p>15 the office and bogged down the office for many years.</p> <p>16 So I do take the view that going to the Press Complaints</p> <p>17 Commission should have been the right course of action.</p> <p>18 I do take the view that going to Parliament with two</p> <p>19 reports and getting the law changed was the right course</p> <p>20 of action. I think those proved to be very effective</p> <p>21 ways of bringing home to the whole of the national press</p> <p>22 the total unacceptability of this sort of activity.</p> <p>23 And I think the fact that virtually every allegation</p> <p>24 of hacking into databases by the press pre-dates 2006</p> <p>25 and nothing has come to light in the last three or four</p> <p style="text-align: center;">Page 69</p>	<p>1 MR JAY: But the truth, Mr Thomas, is you say in paragraph 7</p> <p>2 of the witness statement you were just looking at that</p> <p>3 the option of pursuing journalists subsequently was only</p> <p>4 theoretical, which of course by that stage it was.</p> <p>5 A. I'm sorry, you've lost me. Which --</p> <p>6 Q. Your fourth witness statement.</p> <p>7 A. Oh, sorry.</p> <p>8 Q. Tab 59.</p> <p>9 A. Yes.</p> <p>10 Q. Paragraph 7.</p> <p>11 A. Yes.</p> <p>12 Q. At the very end of that paragraph you refer to "the</p> <p>13 remaining possibility, however theoretical, of</p> <p>14 prosecuting journalists".</p> <p>15 A. Yes.</p> <p>16 Q. So is that was how you were looking at it.</p> <p>17 A. Well, that's very much the case. Seeing how we got on</p> <p>18 with the main case, seeing where that led to, and then</p> <p>19 taking stock at that time. But events proved otherwise.</p> <p>20 Events turned out otherwise.</p> <p>21 In one of the papers ... yes, I think it's that same</p> <p>22 conference in January 2005, I raised the question: are</p> <p>23 we prejudicing ourselves by delay? And counsel advised:</p> <p>24 "No, you're not. You can come back to this at a later</p> <p>25 stage."</p> <p style="text-align: center;">Page 71</p>
<p>1 months appear to have happened after that time. I am</p> <p>2 not saying it's been eliminated altogether -- this is</p> <p>3 under the surface, clearly -- but I am saying -- and my</p> <p>4 successor has said this to Parliament very recently,</p> <p>5 in October of this year -- that it appears that the</p> <p>6 press are now behaving themselves in this particular</p> <p>7 area.</p> <p>8 So I'm putting that forward, sir, because I think</p> <p>9 it's important to record that prosecution is not the</p> <p>10 only way to deal with a particular problem.</p> <p>11 LORD JUSTICE LEVESON: That must be right. Paragraph 10, of</p> <p>12 course, reads:</p> <p>13 "RT confirmed that that was his gut instinct [namely</p> <p>14 that they would be a barrel of monkeys, presumably] and</p> <p>15 Mr Thomas confirmed that he felt that if we had</p> <p>16 seriously thought of prosecuting the media, we would</p> <p>17 face enormous difficulties."</p> <p>18 A. That's correct, sir, and so -- what I'm saying is it was</p> <p>19 not considered actively one way or the other.</p> <p>20 LORD JUSTICE LEVESON: Is that what it says?</p> <p>21 A. Yes. It was not -- that's what I'm saying, sir. It was</p> <p>22 not a conscious decision not to prosecution journalists.</p> <p>23 If you look later in the bundle, that option is still on</p> <p>24 the table, and at one point I think the counsel say,</p> <p>25 "Let's leave that for a later stage."</p> <p style="text-align: center;">Page 70</p>	<p>1 I'm sorry, this is in 2004. This is when -- this is</p> <p>2 document 48740. This was a note by the new in-house</p> <p>3 lawyer, Phil Taylor, on a meeting with me on 4 August</p> <p>4 and on the second page, I think this brings out why</p> <p>5 I wanted this to be a priority for him and the last</p> <p>6 paragraph reads:</p> <p>7 "RT [that's me] stated that in addition, what he</p> <p>8 wanted to be in a position to do as well as bringing</p> <p>9 proceedings would be to write to the various journalists</p> <p>10 and editors involved to highlight to them the new annex</p> <p>11 to the Press Complaints Commission code of practice,</p> <p>12 together with drawing their attention to the fact</p> <p>13 they're incredibly lucky not to have been prosecuted in</p> <p>14 this respect, but in any event, it is something that can</p> <p>15 be dealt with at a slightly later stage."</p> <p>16 Q. But that was a threat that you were, perhaps in</p> <p>17 a slightly empty way, if I may say so, delivering to the</p> <p>18 journalists. The reality is that (a) this was never</p> <p>19 seriously considered -- see the note which Lord Justice</p> <p>20 Leveson has just referred you to -- and (b) at this</p> <p>21 stage, insofar as it was a possibility at all, it was an</p> <p>22 entirely theoretical possibility. Wouldn't you agree</p> <p>23 with those propositions?</p> <p>24 A. Totally agree.</p> <p>25 Q. You would agree?</p> <p style="text-align: center;">Page 72</p>

18 (Pages 69 to 72)

<p>1 A. It was a theoretical one, but it was not a dead 2 possibility.</p> <p>3 Q. It was as dead as it could possibly be, Mr Thomas --</p> <p>4 A. No, because we hadn't --</p> <p>5 Q. -- both in your mind and in practical terms.</p> <p>6 A. No, we hadn't had the outcome of the case. The case 7 didn't go to trial until 2005, so we were keeping open 8 the possibility, but it was not a live possibility, if 9 I can put it that way.</p> <p>10 Q. Yes. Because in your first report, which is under our 11 tab 4, RJT1, paragraph 6.8, page 00708 -- we've reached 12 the position in chronological terms that the four 13 prosecutions, the subject of matter of Operation Glade, 14 had hit a rather large iceberg in the form of 15 Blackfriars Crown Court. All four, I think, got 16 conditional discharges.</p> <p>17 A. (Nods head)</p> <p>18 Q. That, of course, had certain consequences for Operation 19 Motorman, and we can quite see why a policy decision was 20 then taken to discontinue Operation Motorman in due 21 course. Are you with me, Mr Thomas?</p> <p>22 A. Yes.</p> <p>23 Q. Then you say in 6.8:</p> <p>24 "This was a great disappointment to the ICO, 25 especially as it seemed to underplay the seriousness of</p> <p style="text-align: center;">Page 73</p>	<p>1 I think that although it might be slightly overstating 2 it because I accept that it was not a very real 3 possibility, nevertheless it was only at that point -- 4 I'm quite clear about this -- only at that point, after 5 the Blackfriars trial, was the possibility of going 6 against journalists completely extinguished, and what we 7 had been pursuing in the meantime was other means of 8 trying to prevent this sort of unacceptable behaviour.</p> <p>9 And I do need to really emphasise this, Mr Jay, 10 because you asked me at the beginning about the various 11 functions of the office.</p> <p>12 Q. Yes.</p> <p>13 A. We're primarily not a prosecuting authority. That was 14 almost on the side. One of our main functions was to 15 promote good practice, to prevent breaches of the data 16 protection legislation. And so increasingly, from my 17 initial encounters with the Press Complaints Commission 18 and right through the two or three years that followed, 19 I was very clear in my mind that the emphasis on 20 everything I was doing was the prevention of this sort 21 of activity recurring any further.</p> <p>22 Q. We'll come to the other pieces of enforcement action 23 within your --</p> <p>24 A. This is important stuff because --</p> <p>25 Q. Of course, of course, and I'm going -- in time, we will</p> <p style="text-align: center;">Page 75</p>
<p>1 Section 55 offences. It also meant that it was not in 2 the public interest to proceed with the ICO's own 3 prosecutions."</p> <p>4 Well, we can agree with that proposition so far.</p> <p>5 "Nor could the Information Commissioner contemplate 6 bringing prosecutions against the journalists or others 7 to whom confidential information had been supplied."</p> <p>8 May I suggest to you that that is possibly slightly 9 overstating the position, that the policy decision had 10 already been taken, there was a theoretical 11 consideration only of prosecuting journalists after that 12 policy decision had been taken and therefore it might 13 not be quite right to say that prosecutions against the 14 journalists could be contemplated after April 2005.</p> <p>15 Would you agree?</p> <p>16 A. Well, that may slightly overstate the case, in your 17 language, but I do believe that it is entirely 18 consistent with everything I've said to this Inquiry. 19 I don't accept that there was a "policy decision". 20 I don't accept that we abandoned the possibility of 21 prosecuting the journalists. It was only after the 22 outcome of the Blackfriars trial that not only did we 23 have to abandon our own prosecution some two months 24 later, but also that completely extinguished any 25 possibility whatsoever of prosecuting journalists, and</p> <p style="text-align: center;">Page 74</p>	<p>1 deal with it fully.</p> <p>2 A. It's important stuff also to point out the limitations 3 of prosecutions. Not only had the case which we had 4 brought taken a great deal of resource; it had resulted 5 in conditional discharges, which led to a very perverse 6 outcome in all these respects. So I think that does 7 rather highlight that a criminal prosecution and 8 a conviction is not necessarily by any means the full 9 story.</p> <p>10 Q. The evidence you gave to the Select Committee on these 11 matters -- that's the Culture, Media and Sport 12 Committee, under our tab 80. I note that my copy does 13 not have the URN numbers, which may be my deficiency and 14 no one else's, but we can work from the pagination at 15 the top right-hand side of tab 80.</p> <p>16 LORD JUSTICE LEVESON: Or the question numbers.</p> <p>17 MR JAY: Yes, it's question 40 then. EV21.</p> <p>18 A. Is this the Select Committee of March 2007?</p> <p>19 Q. It is indeed.</p> <p>20 A. Yes.</p> <p>21 Q. Question 40 was:</p> <p>22 "I understand it's a breach of the law not just for 23 a person who legally accesses the database. It's also 24 a breach of the law by the person who commissioned them 25 to do so. If there was evidence the journalists had</p> <p style="text-align: center;">Page 76</p>

<p>1 paid these people to access databases illegally, they 2 themselves would be breaking the law. Did you 3 investigate that?" 4 Then your answer is: 5 "Yes." 6 But did you investigate that? 7 A. I think the "yes" there was a digesting of the question, 8 rather than precisely answering the particular question. 9 I think it was just a pause answer rather than: "Yes, we 10 did investigate journalists", and I would not want to 11 read too much into that particular single word by itself 12 there. But I don't think I was saying, "Yes, we 13 investigated journalists", but yes, in a more general 14 sense, we were looking at everything that was going on. 15 Then I went on to describe the various issues. 16 Q. To be fair to you, that may well be right, because you 17 say: 18 "The offence is cast in terms of obtaining, 19 disclosing and procuring." 20 So because there was wrapped up in the question at 21 least two propositions, you weren't necessarily 22 addressing the final one, "did you investigate?" 23 A. I think you're dissecting that exchange far more closely 24 than it bears. 25 Q. I'm trying to help you actually, Mr Thomas.</p> <p style="text-align: center;">Page 77</p>	<p>1 Q. I thought that the conviction on 19 April 2005 was for 2 corruption? 3 A. No, no, no, no, no. He pleaded not guilty and it was 4 perfectly clear now there was some sort of plea 5 bargaining. He pleaded guilty to Section 55. 6 Q. I'll look at that an appropriate time. It certainly 7 wasn't my understanding, but it may be that my 8 understanding is incorrect. 9 Then you carry on: 10 "We were going to wait and see what the outcome of 11 that case had been before taking any further action." 12 And then, lower down the page, you describe what the 13 nature of the information was and you say, four lines 14 down, I would suggest correctly: 15 "So there was what I might call hard prima facie 16 evidence." 17 Do you see that? 18 LORD JUSTICE LEVESON: Three lines above the bottom of the 19 page. 20 A. Yes, indeed, I have it, yes. That's right. 21 MR JAY: That's probably a correct characterisation of what 22 the evidence amounted to. 23 A. That's -- 24 Q. In the sense, of course -- 25 A. That's exactly as I did and do see it, hard prima facie</p> <p style="text-align: center;">Page 79</p>
<p>1 A. Well, I'm trying to be as open, as clear and as 2 straightforward as I possibly can be, but I don't 3 think -- I've not thought about it before. I don't 4 think that was a "Yes, did you investigate that". In 5 the general sense, we investigating everything but did 6 we specifically go and interview journalists? The 7 answer is no, but that isn't really what they were 8 getting at. 9 Q. Lower down, level with the lower holepunch: 10 "We had hard documentary evidence of what they had 11 done ..." 12 That of course, the "they", the pronoun, is the 13 investigators? 14 A. Yes. 15 Q. "... and indeed that led to a guilty finding. We were 16 going to wait ..." 17 Did it, though? 18 A. I'm sorry? 19 Q. Did it? Your Operation Motorman was discontinued 20 against the investigators, wasn't it? 21 A. No, but the guilty finding was the guilty finding 22 against Whittamore at Blackfriars Crown Court. 23 Q. Yes, but not in relation to any data protection issue? 24 A. Yes, it was. The conviction was for Section 55 at 25 Blackfriars Crown Court.</p> <p style="text-align: center;">Page 78</p>	<p>1 evidence. When we come on to discuss the content of our 2 reports, I will say that the reports contained hard 3 prima facie evidence of offences. 4 Q. Yes, and then you say: 5 "But equally, to bring a prosecution for the offence 6 of procuring is never going to be easy. I would not 7 disguise that from anybody. In that particular case, we 8 were unable to proceed [I think it should say] with any 9 further legal action." 10 That, of course, is after the events of April 2005. 11 The next question from the chairman: 12 "Could I press you on that? Because you're 13 suggesting to us that you did have evidence which might 14 well have been of sufficient quality to enable 15 a prosecution but you did not proceed because you were 16 advised it might be against the public interest. Why 17 should it be against the public interest? 18 "Because it would be, essentially, a waste of time 19 and effort for my organisation but also if we were to go 20 to the courts, it would be back to the magistrates' 21 court and bring prosecutions. We would have to decide 22 which of the journalists to prosecute. Should we go for 23 the whole lot or sum? And the strong advice from our 24 counsel was that we should not and could not proceed 25 with such prosecutions. It would be attracting severe</p> <p style="text-align: center;">Page 80</p>

<p>1 criticism within the court system if we were to go any 2 further."</p> <p>3 To be clear, Mr Thomas, you're looking there at the 4 public interest decision after April 2005, not before, 5 aren't you?</p> <p>6 A. That -- what I'm talking about there is the advice we 7 received on 27 May 2005 --</p> <p>8 Q. Correct.</p> <p>9 A. -- where there was a conference with counsel as 10 documented here --</p> <p>11 Q. We can take it very shortly --</p> <p>12 A. I have a clear memory of that. That's why when I was 13 talking to the Select Committee, that's exactly what 14 I was referring to.</p> <p>15 Q. Because by the time there were any conditional 16 discharges against the four investigators in relation to 17 Operation Glade, someone could very reasonably take the 18 judgment there's no point pursuing the data protection 19 matters against private investigators, given what the 20 likely sentences were going to be. That was the gist of 21 counsel's advice, wasn't it?</p> <p>22 A. Well, absolutely. Exactly that.</p> <p>23 Q. Yes.</p> <p>24 A. And you'll see -- this is document 48808. That's the 25 very full note of the conference with counsel, and the</p> <p style="text-align: center;">Page 81</p>	<p>1 A. That's -- the in-house lawyer, Phil Taylor, appears to 2 have written this note up, yes.</p> <p>3 MR JAY: He was told that a number of journalists were 4 interviewed. This is at 07741. But that was in the 5 context, at least at that stage, of an indictment which 6 was concerned with a corruption conspiracy, wasn't it? 7 Because we know the indictment was late amended, as 8 you've reminded me. The reason --</p> <p>9 A. I'm not very familiar with what happened there.</p> <p>10 Q. No.</p> <p>11 A. All I know is that conspiracy charges were brought. My 12 understanding was that they also included data 13 protection matters.</p> <p>14 Q. Yes.</p> <p>15 A. That the case did not proceed vis-a-vis the conspiracy 16 and ended up with the convictions for the data 17 protection offences.</p> <p>18 I also understand that there was a feeling that the 19 prosecutor had not accurately conveyed some of the 20 material to the court vis-a-vis the journalistic 21 aspect, and I can't turn it up straight away now, but 22 some of the notes you've had from the ICO's legal file 23 indicated that the barrister for the CPS had not perhaps 24 conveyed the full picture. We'd sort of -- if you like, 25 were not actively engaged or involved in that.</p> <p style="text-align: center;">Page 83</p>
<p>1 advice was that we had to drop any further cases and 2 I was very concerned about that advice. I was 3 questioning and challenging it. If you read the full 4 note, you'll see see that I was very reluctant to be 5 told that will we could not go any further with this 6 case. I questioned and challenged it in various ways. 7 But at the end of the day, it says on page 48813: 8 "RT stated he felt he had to swallow hard and accept 9 the advice he was being given by counsel in this 10 matter." 11 So that was the point at which we were being told 12 that we could not pursue our prosecutions any further 13 because the public interest so demanded.</p> <p>14 LORD JUSTICE LEVESON: Did you know that the judge at 15 Blackfriars had asked where the journalists were?</p> <p>16 A. I only knew that about a month ago, sir, when I saw the 17 transcript of the trial. I didn't know at the time.</p> <p>18 MR JAY: We have the transcript at RJT49. This is one that, 19 because there may be journalist names mentioned, 20 probably is not going to be put up on any screen. So 21 underneath our tab 56. Of course, the core participants 22 have seen the full document. The judge did ask 23 a question about the journalists.</p> <p>24 LORD JUSTICE LEVESON: It's not actually a transcript, is 25 it? It's a file note prepared by your office, I think.</p> <p style="text-align: center;">Page 82</p>	<p>1 Q. The original conspiracy at the time out in the 2 indictment was a conspiracy in relation to corruption 3 matters, but what happened appears on the internal 4 numbering of this file note, page 10, which may or may 5 not have reached your bundle, because it only came to 6 light, I think, on Monday. Has it been added?</p> <p>7 LORD JUSTICE LEVESON: It has.</p> <p>8 MR JAY: It may not had been added to everyone's, but it's 9 clear from what's said in the middle of the page that 10 two of the men pleaded guilty to the indictment as 11 originally constituted, which was not for data 12 protection, but then quite late, on 6 April 2005, the 13 Crown amended the indictment to include two offences 14 under the Data Protection Act. Whittamore and Boyall 15 both pleaded guilty.</p> <p>16 So it did involve in part data protection but in the 17 main it was outside data protection, it was police 18 corruption. Do you follow me?</p> <p>19 A. I do, but of course the whole case arose out of the 20 circumstances. I mean, here we had private detectives 21 paying money to people inside the DVLA, inside British 22 Telecom, inside the police, to get the information. So 23 my understanding, I think, remains the case that this 24 was a far more serious matter than a breach of 25 Section 55. That's why the Crown Prosecution Service</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 took it over and prosecuted in that way.  2 Q. Yes, but --  3 A. Then the prosecution appears to have gone wrong in some  4 way. There are suggestions in the later papers that  5 there had not been adequate disclosure by the CPS and  6 the CPS were reluctant to let the case go all the way to  7 full trial, and so some sort of deal seems to have been  8 done, leading to the --  9 Q. Do you have person knowledge of this or is this  10 speculation?  11 A. No, I don't at all.  12 Q. Some would say, well, if you're turning a bit off-piste  13 and making criticisms of others --  14 A. I'm just recording what's in the paperwork.  15 Q. Okay. We do know that by the time you were forced with  16 making the unpalatable decision to discontinue the  17 Operation Motorman prosecutions, of course at that point  18 the only parties to the relevant conspiracy were the  19 private investigators. They were not the journalists,  20 were they?  21 A. That's correct.  22 Q. Can I move off that topic to another topic, which is the  23 quality of the evidence you had. It's possible that  24 I can take this quite shortly, given your correct  25 characterisation before the Select Committee of the</p> <p style="text-align: center;">Page 85</p>	<p>1 in the Motorman enquiry and are positively known to  2 constitute a breach of the DPA."  3 Can we be clear about that? What type of  4 transactions are you referring to there? Or are you not  5 able to say? By "type", I mean are you referring to  6 ex-directory searches, aggregating those with a number  7 of other type of transactions to arrive at 5,025? Or  8 can you not assist us further?  9 A. Well, first of all, this was not my letter. This was  10 written by -- this was the draft -- the office has not  11 found a copy of the actual letter. This was a draft  12 which has been found of a letter written by Philip  13 Taylor.  14 Q. Yes.  15 A. And bear in mind, please, that he was the solicitor who  16 was involved in all the -- well, the middle and late  17 stages of the prosecution. He was the solicitor who  18 attended the Blackfriars trial, for example, and he was  19 dealing with counsel right through 2004 and 2005.  20 Q. Yes.  21 A. And he was heavily involved in the preparation of the  22 two reports from my office. It was the first report  23 which documented the nature and the extent of this  24 illegal trade in personal confidential information, and  25 he was the -- he drafted the first, if not the second</p> <p style="text-align: center;">Page 87</p>
<p>1 evidence amounting to a hard prima facie case or hard  2 prima facie evidence, but of course, the strength of the  3 evidence will fluctuate a bit, depending on whether  4 you're looking at friends and family and PNC on the one  5 hand, and area searches on the other. Would you accept  6 that as a general statement?  7 A. Yes. I think I was also talking to the Select Committee  8 in fairly general terms.  9 Q. I'm not suggesting that you were doing otherwise.  10 Can I ask you, please, to look at exhibit RJT47,  11 which is under our tab 54, where you are giving more  12 information. If you can just attain your bearings,  13 Mr Thomas, in relation to evidence you gave or material  14 you gave in answer to a Freedom of Information Act  15 request. You cover that in your second witness  16 statement.  17 If you look at page 07726, which is the second  18 page of this letter -- do you have that?  19 A. Not yet. 7726?  20 Q. Please.  21 A. Mm-hm.  22 Q. At the bottom of the second page, you say:  23 "There were 13,343 transactions recorded in the  24 source material ... of these, 5,025 are identified as  25 transactions that were (of a type) actively investigated</p> <p style="text-align: center;">Page 86</p>	<p>1 and third drafts of that report, which led to the  2 statement that there were 305 journalists implicated in  3 the material which had been found. That led to the  4 freedom of information request which was received  5 probably in about September, October of 2006.  6 Q. It did.  7 A. And this is his draft reply to the FOI requester. So  8 he's the one who made the judgment there, which fed into  9 both our reports, that of the source material examined,  10 some 13,000 transactions, he characterised some 5,000 --  11 5,025 -- as transactions of a type which were positively  12 known to constitute a breach of the Act.  13 Now, you might be asking me: how did he form that  14 judgment? I can't say for sure. I have speculated in  15 my witness statement, but I think it would be a similar  16 sort of material as that which did lead to the  17 convictions, and material which could not have got into  18 the hands of anybody except by way of asking questions.  19 Put it that way.  20 Q. Yes.  21 A. We're going to come on and talk about, for example,  22 ex-directory numbers, but we're talking also in this  23 situation about friends and family details, criminal  24 record details, details of convictions and ex-directory  25 numbers, all of which at least raise questions about how</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

<p>1 they got into the hands of the investigator.</p> <p>2 Q. The language used here is "positively known to</p> <p>3 constitute a breach", so it's putting it quite high --</p> <p>4 A. It's putting it quite high. You asked me earlier was</p> <p>5 something slightly overstated and this might perhaps be</p> <p>6 slightly overstated. I mean, yes, he's a lawyer, but</p> <p>7 I don't think he's saying that this is absolutely</p> <p>8 guaranteed, as it were, to result in a conviction.</p> <p>9 We're not in a court of law in writing these letters,</p> <p>10 but he was of the view that this was -- this would have</p> <p>11 been sufficient to amount in a conviction.</p> <p>12 Q. If you aggregate all the PNC requests and the friends</p> <p>13 and family requests amongst the 13,343, an exercise</p> <p>14 which I haven't done apart from impressionistically, you</p> <p>15 only get to a number in the hundreds. You don't get to</p> <p>16 the thousands. There are only relatively few of those.</p> <p>17 In order to get to 2,025, you are presumably</p> <p>18 including the ex-directory requests --</p> <p>19 A. I've not done the arithmetic either, Mr Jay, but my</p> <p>20 impression, from looking at these papers, is that they</p> <p>21 must have included the ex-directory material, too.</p> <p>22 Q. If you look at the next page, 07727, where you're</p> <p>23 looking at the slightly less evidentially potent</p> <p>24 category, the 6,330, they're described as occupant</p> <p>25 searches, which represent transactions that are thought</p> <p style="text-align: center;">Page 89</p>	<p>1 on, I think that was sufficient.</p> <p>2 Q. To be fair again, there's a distinction --</p> <p>3 A. Sorry, one further point. Not being said here these</p> <p>4 were offences committed by journalists. This was</p> <p>5 clearly focused primarily on offences committed by the</p> <p>6 private investigators.</p> <p>7 Q. That was my next question --</p> <p>8 A. Sorry.</p> <p>9 Q. -- which you've read my mind and answered, so I don't</p> <p>10 need to ask it.</p> <p>11 A. If you look at the language of both reports, it is very</p> <p>12 clear on that. We are not saying -- and I think some of</p> <p>13 the media organisations perhaps have read too much into</p> <p>14 the report -- we're not saying that each and every one</p> <p>15 of these was an offence committed by a journalist. What</p> <p>16 we were saying in our report is that journalists were</p> <p>17 significant customers of information which appeared to</p> <p>18 have been obtained illegally.</p> <p>19 Q. Is that what you were saying there in the second report?</p> <p>20 My exhibit is not marked. It's under tab 6. It may</p> <p>21 well be exhibit 2. The page I want to look at is</p> <p>22 page 00335. I think it is exhibit 2, isn't it,</p> <p>23 Mr Thomas?</p> <p>24 A. Yes, I think so. The second of our reports?</p> <p>25 Q. Yes.</p> <p style="text-align: center;">Page 91</p>
<p>1 to have been information obtained from telephone service</p> <p>2 providers and are likely breaches of the DPA. However,</p> <p>3 the nature of these is not fully understand and it's for</p> <p>4 this reason that they are considered to be probable</p> <p>5 illicit transactions."</p> <p>6 It might be said by those representing the media</p> <p>7 organisations that, again, that's an overstatement,</p> <p>8 isn't it?</p> <p>9 A. Well, I can't answers that in detail. I can only, like</p> <p>10 you, speculate. But what appears to have happened is</p> <p>11 that the investigators -- this was a new team of</p> <p>12 investigators, by this time, who had come on the scene</p> <p>13 to look at this material, they and the inhouse lawyers</p> <p>14 classified the material into three broad headings.</p> <p>15 Q. Yes.</p> <p>16 A. What appeared to be definite, what appeared to be</p> <p>17 probable and that which is outside altogether. Now, I'm</p> <p>18 not saying that every single case would have stood up in</p> <p>19 a court of law and resulted in a conviction, and</p> <p>20 therefore for both those first two classifications there</p> <p>21 may have been, to use your language, a slight</p> <p>22 overstatement. But I think for the purposes of writing</p> <p>23 our report, to draw attention to what the evidence</p> <p>24 appeared to show, to draw the attention of the media,</p> <p>25 government, Parliament, everyone else, to what was going</p> <p style="text-align: center;">Page 90</p>	<p>1 A. Yes. Which page are you on?</p> <p>2 Q. I'm on the internal numbering page 8.</p> <p>3 A. Page 8.</p> <p>4 Q. But 00335.</p> <p>5 A. Yes.</p> <p>6 Q. This is when you're introducing the table. You got to</p> <p>7 the 305 journalists --</p> <p>8 A. Yes.</p> <p>9 Q. And you say, two paragraphs from the bottom:</p> <p>10 "Having considered the matter further, the</p> <p>11 Information Commission has decided that a further</p> <p>12 disclosure is in the public interest and in the context</p> <p>13 of a special report to Parliament is consistent with the</p> <p>14 discharge of his functions under the Data Protection Act</p> <p>15 1998. The following table shows the publications</p> <p>16 identified from documentation seized during the</p> <p>17 Operation Motorman investigation, how many transactions</p> <p>18 each publication was positively identified as being</p> <p>19 involved in and how many of their journalists (or</p> <p>20 clients acting on their behalf) were using these</p> <p>21 services."</p> <p>22 So you're saying there that you're drawing</p> <p>23 a distinction. The positive identification relates to</p> <p>24 the transactions and to the private investigators, and</p> <p>25 the journalists are simply those who are using these</p> <p style="text-align: center;">Page 92</p>

23 (Pages 89 to 92)

<p>1 services; is that correct?</p> <p>2 A. Yes. That documents that large numbers of journalists</p> <p>3 were buying large amounts of information from</p> <p>4 investigators who, in our view, can only have obtained</p> <p>5 that information by breaching Section 55, some of whom</p> <p>6 had been convicted of sample cases, some year or 18</p> <p>7 months earlier.</p> <p>8 Q. Mm.</p> <p>9 A. We are not saying that the journalists in every case</p> <p>10 committed an offence. We are suggesting, I think, that</p> <p>11 it is likely they may have been committing an offence</p> <p>12 but we've explored this fairly fully this morning</p> <p>13 already. There was not a trial, so we cannot say with</p> <p>14 certainty that anyone committed any offence. But we are</p> <p>15 saying that they were driving the market. We are saying</p> <p>16 they were customers for information which appeared to</p> <p>17 have been obtained illegally and for which there had</p> <p>18 been conviction.</p> <p>19 Q. You're certainly saying in the last paragraph on this</p> <p>20 page that the only defence you can see as a possible</p> <p>21 defence is the public interest or similar issues.</p> <p>22 A. Well --</p> <p>23 Q. Aren't you?</p> <p>24 A. I'm not particularising that to whom might have been the</p> <p>25 defendants. Whittamore did not raise public interest</p> <p style="text-align: center;">Page 93</p>	<p>1 A. I think that's a very good question, sir, and I'm not</p> <p>2 disagreeing with that. I think that's why I'm saying it</p> <p>3 is, to my mind, highly likely that would have been an</p> <p>4 offence, and so we are coming close to suggesting that</p> <p>5 there were offences, at least in some cases, but we were</p> <p>6 not going to be writing down here -- nor am I saying</p> <p>7 today -- that every single one of these was an offence</p> <p>8 by a journalist.</p> <p>9 It was very, very likely indeed to be an offence by</p> <p>10 the private investigator, and to my mind -- and I think</p> <p>11 to your mind too, from my understanding of what you were</p> <p>12 saying -- it looked very much though as though it would</p> <p>13 have been an offence by the journalist. But we were</p> <p>14 conscious we had not prosecuted, we had to abandon the</p> <p>15 prosecutions we had in train, we hadn't got the hard</p> <p>16 evidence that, if you like, there was a conviction, so</p> <p>17 we had to use our words quite carefully. We are</p> <p>18 suggesting -- Mr Jay put it to me that we were implying.</p> <p>19 We were coming close to that and I stand by that but</p> <p>20 I am not able to say categorically, because only</p> <p>21 a criminal court can say that, that they were guilty of</p> <p>22 the offence.</p> <p>23 LORD JUSTICE LEVESON: I understand that.</p> <p>24 A. And that there may have been an offence in each</p> <p>25 particular case.</p> <p style="text-align: center;">Page 95</p>
<p>1 defences. He pleaded guilty. If there had been any</p> <p>2 prosecutions of journalists, it's quite possible they</p> <p>3 would have raised a public interest defence. There may</p> <p>4 have been other defences. They may have said it wasn't</p> <p>5 knowing or reckless, which is part of the offence</p> <p>6 itself. So we're not saying here that the journalists</p> <p>7 were committing offences. They may have been, they may</p> <p>8 not have within. One would have to look at each</p> <p>9 particular case.</p> <p>10 Q. Yes, but then on the table itself on the next page, you</p> <p>11 are linking various publications with number of</p> <p>12 transactions positively identified and then the number</p> <p>13 of journalists. So you are perhaps giving the</p> <p>14 impression that these newspapers have committed</p> <p>15 offences, aren't you?</p> <p>16 A. I wouldn't go as far as that. We're moving in that</p> <p>17 direction, shall we say, but we're not categorically</p> <p>18 saying that journalists have committed offences.</p> <p>19 LORD JUSTICE LEVESON: Could I just ask you about that,</p> <p>20 please? I understand the definition of the offence in</p> <p>21 Section 55(1) of the Act, but if a private detective is</p> <p>22 asked to get friends' and families' numbers which are</p> <p>23 covered by the Act, how could that not be knowingly or</p> <p>24 recklessly at the behest of the person who asked him to</p> <p>25 get that information?</p> <p style="text-align: center;">Page 94</p>	<p>1 LORD JUSTICE LEVESON: Can you think of one?</p> <p>2 A. Not offhand, no.</p> <p>3 Well, let's take the example we're talking about,</p> <p>4 family and friends. It depends where the evidence comes</p> <p>5 from, but if it's in the hands of a journalist that he</p> <p>6 has got from Mr Whittamore a list of someone's family</p> <p>7 and friends, I find that quite outrageous in policy</p> <p>8 terms. I find it highly, highly indicative in legal</p> <p>9 terms that that must have involved a breach of</p> <p>10 Section 55 at some stage, certainly by the investigator,</p> <p>11 almost certainly by the journalist.</p> <p>12 MR JAY: But if --</p> <p>13 A. And likewise for criminal records.</p> <p>14 Q. But everybody knows that family and friend numbers can</p> <p>15 only be obtained by getting a copy of the bill or</p> <p>16 someone at British Telecom telling you what's on the</p> <p>17 bill.</p> <p>18 A. That is exactly what was our very, very strong</p> <p>19 hypothesis, and I think this is, you know, what so</p> <p>20 outraged me, that this was going on and led to such</p> <p>21 a light sanction when it finally got to trial, that</p> <p>22 I felt there was no option whatsoever but to bring it to</p> <p>23 much wider public attention, despite the difficulties in</p> <p>24 doing that. That led to the first report, "What price</p> <p>25 privacy?", being written.</p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)



<p>1 Bear in mind it's not just the press, if I may say 2 so. That's a very important point. We were targeting 3 the entire market and there were other customers, as the 4 report makes very clear. I know the focus of this 5 Inquiry is on the press, but we were not looking at it 6 in terms of: "Let's expose what the press are up to". 7 It's: "Let's expose this whole market", and there were 8 a lot of people and at the end of the day, it really 9 sort of boiled down to any citizen in this country is at 10 risk of having highly personal information obtained by 11 others against their will, and we -- sort of we 12 published the tariff, we published the training manuals. 13 We documented that for £150 to £200, virtually anybody 14 in this court today, the owner of a car parked outside 15 their house could be tracked down. An ex-directory 16 phone number, it would cost between £65 and £75. £750 17 was the cost of getting anyone's call records, £500 the 18 cost of getting criminal records. And I found that 19 absolutely -- 20 Q. I was going you all this, because you're moving ahead 21 now. 22 A. Well, I'm running ahead but I wanted to get this point 23 very, very firmly. 24 Q. What I'd like you to do, if you look at paragraph 5.3 of 25 your first report under tab 4. This is our exhibit</p> <p style="text-align: center;">Page 97</p>	<p>1 checks, ex-directory telephone numbers and details of 2 frequently dialled numbers cannot normally be obtained 3 by such businesses by lawful means." 4 Pausing there, possibly you've understated it, 5 Mr Thomas. PNC and frequently dialled numbers -- these 6 are the family and friends -- cannot be obtain by other 7 than unlawful means. Ex-directory numbers, you may be 8 right, cannot normally be obtained by lawful means. 9 Would you agree with that? 10 A. Absolutely. 11 Q. "Others, such as personal addresses, can be obtained 12 lawfully only by the old footslogging means, such as 13 personal checks of the full electoral register. The 14 prices charged for some pieces of information raise 15 questions about their provenance. Either the price was 16 too low for information obtained lawfully (as in the 17 case of personal addresses), or it was high enough to 18 indicate criminal activity (as in criminal records 19 checks)." 20 So if you give us the prices again, maybe you'll be 21 able to illustrate that point for us, Mr Thomas. 22 A. I looked at that sentence a lot and I just wonder 23 whether there's a mistake there. I think the word 24 probably should have read "too high" in the penultimate 25 line. I can't fully understand that sentence now.</p> <p style="text-align: center;">Page 99</p>
<p>1 RJT1, page 00296. I said in opening this case I was 2 going to ask you questions on 5.3, and you're giving us 3 the answers. Just so that we can tether those answers 4 to your report and see the context -- are you with me, 5 Mr Thomas? 6 A. No, I've lost you. Which page are you on, I'm sorry? 7 Q. 00296, paragraph 5.3 of your first report. 8 A. Sorry, I'm on the second report. 9 Q. These are rather strong points you make. 10 A. Yes. 11 Q. And they're probably very well substantiated. Just so 12 that we follow the line of your evidence, you say here: 13 "This was not just an isolated business operating 14 occasionally outside the law, but one dedicated to its 15 systematic and highly lucrative flouting. Nor could its 16 customers --" 17 Well, in our context, those are the journalists; is 18 that right? 19 A. Yes, although we are writing this also aware that banks, 20 insurance companies, law firms -- 21 Q. In our context. 22 A. In your context, I understand, but I'm explaining the 23 report itself. There's a market. 24 Q. (overspeaking): 25 "Some of the information obtained, such as PNC</p> <p style="text-align: center;">Page 98</p>	<p>1 I think it reads more clearly if you read it as: 2 "The price was too high for information obtained 3 lawfully or it was high enough to indicate criminal 4 activity." 5 It was certainly not a well-crafted sentence. 6 I recognise that. 7 Q. I'm not sure that's right. 8 A. Well, I don't know. I can't make sense of the sentence 9 as currently drafted. 10 Q. I think what you're saying is that if you're only paying 11 £17.50 for an occupancy check, that's an extremely low 12 price. If you're going to use foot-slogging means, it 13 would be more expensive and the lowness of the price 14 therefore is an indicator of illegality. So I think -- 15 A. You can read it several ways. I don't want to put too 16 much weight on that one sentence but it's not a very 17 happily crafted sentence. 18 Q. Well, I think it probably was quite happily crafted but 19 again, my opinion is quite irrelevant. 20 What about "or high enough to indicate criminal 21 activity"? You've given us snippets of that, £750 22 for -- was that the PNC check? 23 A. Well, if you look at paragraph 5.35, that's where the 24 full table is set out. This table was taken from the 25 Motorman materials.</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 Q. Yes, you're right.</p> <p>2 A. And the paragraph opens that, and what we did there was</p> <p>3 to tabulate the price which was recorded as being paid</p> <p>4 by the customer to the blagger, and then the price</p> <p>5 charged to the customer.</p> <p>6 Q. Yes.</p> <p>7 A. And we -- I'm not sure if it's on the screen, but --</p> <p>8 Q. Page 0035.</p> <p>9 LORD LEVESON: We've got it. It's there.</p> <p>10 A. And -- I mean, the examples I was giving earlier are the</p> <p>11 ones which I shared with the Select Committee just to</p> <p>12 illustrate the range of prices. It wasn't a fixed price</p> <p>13 for everything.</p> <p>14 MR JAY: No.</p> <p>15 A. But it was clear that, you know, there was a price to be</p> <p>16 obtained -- the price to be paid for obtaining</p> <p>17 registration ownership details of any car, ex-directory</p> <p>18 phone numbers, call records, criminal records and so on.</p> <p>19 Some were quite low figures, some were quite high</p> <p>20 figures, perhaps, as you're suggesting, reflecting the</p> <p>21 difficulty of obtaining the different sorts of</p> <p>22 information.</p> <p>23 Q. We've been through the different categories with</p> <p>24 Mr Owens and sort of degrees of proof of illegality, and</p> <p>25 I don't think it's necessary to do that again with you,</p> <p style="text-align: center;">Page 101</p>	<p>1 Q. -- as it were, removed from any publicly available</p> <p>2 document, but I should refer, as I did on Monday, to</p> <p>3 RJT29, when you make a correction in relation to the</p> <p>4 Sunday Times, don't you?</p> <p>5 A. Yes. Do you want me to talk through that now?</p> <p>6 Q. I think the Sunday Times would probably like you to, so</p> <p>7 if we could just deal with it quite briefly. It's under</p> <p>8 our tab --</p> <p>9 A. At this stage, I'll say that as a result of a letter</p> <p>10 from the Sunday Times we went back to the figures about</p> <p>11 a month after this was published and we found one error,</p> <p>12 and we corrected that. We wrote to Parliament, we laid</p> <p>13 it before Parliament. We wrote to all recipients, and</p> <p>14 I wrote a letter to the managing editor of the</p> <p>15 Sunday Times with an unreserved apology.</p> <p>16 What we had done, we had taken from the same</p> <p>17 notebook the data for the News of the World, the</p> <p>18 Sunday Times and the Times, and due to an inputting</p> <p>19 error, some had been misattributed. They should have</p> <p>20 been News of the World and they were put onto the</p> <p>21 Sunday Times, and we modified that in the amended table.</p> <p>22 Q. So the table --</p> <p>23 A. I'm not sure whether the table you have is the new or</p> <p>24 the old table.</p> <p>25 Q. It's the old. The table now for the Sunday Times should</p> <p style="text-align: center;">Page 103</p>
<p>1 Mr Thomas. But thank you for reminding us of this</p> <p>2 table, because it's a very convenient setting out of the</p> <p>3 relevant prices.</p> <p>4 You also considered in your second witness statement</p> <p>5 the quantities of money involved here, the payments made</p> <p>6 by the newspaper organisations. This is at our tab 53,</p> <p>7 I think. Your second statement, paragraph 7,</p> <p>8 page 07721.</p> <p>9 A. This was my attempt to make sense of the letter which</p> <p>10 had been sent to the FOI requester where some figures</p> <p>11 had been tabulated, and what I am suggesting in</p> <p>12 paragraph 7, which is on the screen now, is that taking</p> <p>13 the lower estimate for all the newspapers, the ones</p> <p>14 which were, in your language, probable but not positive,</p> <p>15 was £300,435, but a maximum of £547,160.</p> <p>16 Q. Yes.</p> <p>17 A. So that's the range. We're not saying each and every</p> <p>18 one was a criminal offence, but that's the range of the</p> <p>19 prices paid for the information as documented in the</p> <p>20 papers seized during the Whittamore raids.</p> <p>21 Q. Thank you. That gives us an idea of the lucrative</p> <p>22 nature of the business. We're not, of course, looking</p> <p>23 at the exhibit because it names journalists and</p> <p>24 therefore has been --</p> <p>25 A. I see.</p> <p style="text-align: center;">Page 102</p>	<p>1 read only four cases but the News of the World figure</p> <p>2 increases to 228. Let's just check whether the version</p> <p>3 we have reflects those revised figures.</p> <p>4 Yes, it does. These are the revised figures, with</p> <p>5 your correction.</p> <p>6 A. Yes. I have the reprinted version of the report, which</p> <p>7 has the correct figures.</p> <p>8 Q. Thank you.</p> <p>9 Before I move off this topic onto another topic,</p> <p>10 which is going to the PCC, can I just ask you a question</p> <p>11 which arises out of your fifth witness statement, which</p> <p>12 is under our tab 59A. It's paragraph 13. I'm afraid</p> <p>13 I don't have the URN number because the version I have</p> <p>14 printed off is --</p> <p>15 LORD JUSTICE LEVESON: You want this paragraph up?</p> <p>16 MR JAY: Paragraph 13, yes.</p> <p>17 LORD JUSTICE LEVESON: Yes, it's 48890.</p> <p>18 MR JAY: Thank you.</p> <p>19 Here you're dealing with some evidence, Mr Thomas,</p> <p>20 from the Daily Mail. Are you with me?</p> <p>21 A. Yes.</p> <p>22 Q. You say in paragraph 13:</p> <p>23 "Ms Hartley asserts the conclusion that the</p> <p>24 transactions are likely to reflect enquiries that did</p> <p>25 not involve illegal activity. This appears to have been</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 justified largely by reference to the claim that the 2 great majority of cases consisted of addresses and 3 telephone numbers." 4 Then you say: 5 "However, this is not a conclusion that can be 6 drawn." 7 And then you say: 8 "Addresses and telephone numbers obtained, for 9 example, from telephone companies remain (using the 10 language of Section 55) personal data obtained from 11 a data controller without consent, even where that 12 information might be obtained legally by other means." 13 Just looking at that, if we are concerned with the 14 mens rea of this Section 55 offence, could it not be 15 said that if the information could be obtained legally 16 by other means and the journalist doesn't, in fact, know 17 the means that the private investigator is going to use, 18 well, then it's at least arguable that there isn't 19 knowledge or recklessness for the purposes of 20 Section 55? 21 A. That is correct. I think the point I should make, 22 though, is that the figures in the tabulations were not 23 attributing the offences to the journalists. They were 24 saying that the investigators had committed the offence. 25 And I think both Associated Newspapers and Page 105</p>	<p>1 derived from an illegal source. Would you agree with 2 that? 3 A. Well, I suspect we may come back to this with 4 News International, because they put evidence in 5 recently saying that there is a database of some 6 48 million ex-directory phone numbers. It's the first 7 I'd heard of this, but nevertheless that's what their 8 evidence says and it says that the numbers have been 9 obtained legally. I've no idea what that means. I am 10 somewhat doubtful. But I'm not totally quarrelling with 11 the idea that ex-directory phone numbers might possibly 12 be obtained by legal means. 13 48 million is a huge number, for a start -- 14 Q. Mr Thomas, I'm asking you to think about it in these 15 terms. 16 A. I -- 17 Q. One way you can get an ex-directory number is to plough 18 through old editions of directories and try and find the 19 individual when that individual had a published 20 directory number. That is a possibility and that would 21 be lawful? 22 A. Yes. 23 Q. But that may or may not be particularly plausible. 24 Another way is that these 48 million numbers have 25 all been obtained or most of them obtained illegally by Page 107</p>
<p>1 News International have rather read too much into 2 this -- we'll come onto this later -- by saying that we 3 were saying in every case there would have been an 4 offence committed by a journalist. 5 But the numbers here were the offences primarily 6 committed by the investigators, and given what we know 7 about the modus operandi of Steven Whittamore, I think 8 I would stand by the claim that addresses obtained, for 9 example, from DVLA or from British Telecom would have 10 been obtained by illegal means. He certainly would have 11 had the knowledge for the recklessness. In court, 12 I think he pleaded guilty using the reckless line, but 13 there we are. 14 Q. Then you say, second bullet point: 15 "For most people, a mobile or ex-directory phone 16 number is not in the public domain and is treated as 17 a confidential matter." 18 Well, that certainly is true, but if the issue here 19 is the offence in relation to obtaining a mobile or 20 ex-directory phone number, of course usually you would 21 have to do that by either going to the relevant phone 22 company, in which case certainly an offence is being 23 committed, or by looking at a list which someone else 24 has compiled of such numbers, in which case offences may 25 well have been committed because that list itself is Page 106</p>	<p>1 someone who has deployed the same blagging methods which 2 Mr Whittamore has deployed. 3 A. But there are -- 4 Q. Do you accept that? 5 A. No, because there are other explanations. I'm just not 6 sure it's ex-directory numbers. I suspect it refers to 7 mobile phone numbers. 8 Now, on many, many occasions, when you go onto 9 a website these days, buried away in the small print, 10 without you knowing it, you are consenting to your phone 11 number being passed on to somebody else. So that's one 12 explanation. I deplore that, I campaigned long and hard 13 to get much clearer notices to the general public, but 14 undoubtedly there are organisations out there now who 15 are using the small print -- for example, on websites -- 16 to obtain phone numbers and to be tabulating those. 17 That has become much more prevalent in the last four 18 or five years. It wasn't so prevalent at the time we're 19 talking about, but nevertheless it is, regrettably, 20 a great deal easier these days, primarily through modern 21 technology, to obtain more and more personal information 22 about people. 23 So I can't -- I'm being honest with you, Mr Jay. 24 I cannot say categorically that an ex-directory number 25 must have been obtained illegally, but in going back to Page 108</p>

<p>1 this case, given what we know about Mr Whittamore and                  2 his methods, knowing he had corrupt sources inside the                  3 telephone companies, I think it's highly likely that                  4 ex-directory numbers were obtained illegally, and when                  5 you look at the price list, you don't start paying                  6 the -- I'll just check the ex-directory price.                  7 As a customer, you're charged between £65 and £75. You                  8 don't pay that sort of money if you can get it entirely                  9 legally.                  10 Q. That's the point you make very accurately in                  11 paragraph 5.3 of your first report. You're saying:                  12 let's apply some common sense here, let's look at how                  13 much you're paying for this information. I'm not sure                  14 that one can sensibly disagree too strongly with that.                  15 Your third category in the bullet point on                  16 paragraph 13, where you're dealing with the reverse                  17 tracking category, Mr Thomas:                  18 "Addresses obtained ... from a phone number or car                  19 registration where the address is held by the telephone                  20 company or by DVLA have necessarily been obtained                  21 illegally."                  22 I think that may well be right.                  23 A. I hope it is right. I mean, it seems to me that --                  24 I think some of the media people were saying if it was                  25 only an address, it's only a phone number, what's wrong                  Page 109</p>	<p>1 Press Complaints Commission, with the newspaper                  2 proprietor's association, with the newspaper society,                  3 with the Society of Editors, so I dealt with them all                  4 collectively.                  5 No, I did not go to each individually, but it seemed                  6 to make sense to me to go to them collectively and get                  7 them to put their house in order, and although I'm not                  8 claiming total success, I think we had quite significant                  9 success in doing that. And this was at a time -- you're                  10 taking me right back, of course, to 2003 -- when Rebekah                  11 Wade and Andrew Coulson had been to the Select Committee                  12 denying that this sort of thing was going on, and that's                  13 quoted in our report.                  14 Q. Yes, I've been asked to put to you this question before                  15 I go to the PCC, as it were. Did you ask newspapers or                  16 editors to comment on the table which we see in the                  17 second report, "What price privacy now?" to comment on                  18 the table in draft before it was published?                  19 A. No, it we didn't.                  20 Q. After it was published, apart from the Sunday Times, did                  21 anybody seriously question your findings?                  22 A. Not at all, and more generally, in the many, many                  23 conversations I had after the two reports were                  24 published, nobody questioned the general thrust of our                  25 report. No one asked to see the breakdown of the                  Page 111</p>
<p>1 with that? This is common domain. But that misses the                  2 point entirely. If you got the address from a corrupt                  3 source inside DVLA or you got the address by working                  4 back from the phone number, reverse tracking or                  5 conversion, whatever you like to call it, it seems to me                  6 that can only have been obtained illegally.                  7 Q. Given the mastery that you're displaying of this                  8 material and the inferences to be drawn from it, someone                  9 might say, well, if you had some of the editors in from                  10 the worst offenders towards the top of the list and you                  11 or your team asked them questions on this and their                  12 journalists, you might have got some rather interesting                  13 answers, which would have enabled you to consider, on                  14 a better evidence base, whether or not to prosecute.                  15 Don't you think --                  16 A. Well, my mastery, as you put it -- thank you, but my                  17 mastery has come in the last four or five years. I only                  18 got heavily involved in this when we published our                  19 report in 2006. I have become even more familiar over                  20 the last two or three months, with the build-up to                  21 evidence to this Inquiry. I can now see the picture                  22 perhaps a great deal more clearly.                  23 Your question suggests that we should have done more                  24 with the individual newspapers. We'll come on, maybe                  25 this afternoon now, to talk about what I did with the                  Page 110</p>	<p>1 figures. No one asked -- no one said, "You've got it                  2 all wrong, you're barking up the wrong tree."                  3 And I said this in my first statement, the                  4 overwhelming impression I had from everyone I saw was:                  5 "You've found people out. You've brought to the surface                  6 that which people either knew or had a broad awareness                  7 was going on."                  8 Q. So that we clearly understand this, without naming                  9 individual editors, did you have discussions about these                  10 matters with individual editors?                  11 A. I don't think I've ever had a conversation to this day                  12 with an editor.                  13 LORD JUSTICE LEVESON: Did you go to the code committee at                  14 all?                  15 A. Oh yes.                  16 LORD JUSTICE LEVESON: But the code committee consists of                  17 editors.                  18 A. Well, the people I met there were Les Hinton and                  19 Paul Dacre, and I think they are proprietors rather than                  20 editors.                  21 LORD JUSTICE LEVESON: I don't think so. Mr Dacre might be                  22 pleased to be the proprietor of Associated Newspapers,                  23 but I don't think he is.                  24 A. Sorry, in that case, I met Paul Dacre, but only after                  25 the report -- yes, you're right, he calls himself                  Page 112</p>

<p>1 editor-in-chief, doesn't he, of Daily Mail --</p> <p>2 MR JAY: Well, he is the editor of --</p> <p>3 A. Yes. I'm reflecting back on his notepaper, trying to</p> <p>4 recall what he said on his notepaper. So I have to</p> <p>5 apologise here and now to Mr Dacre.</p> <p>6 MR JAY: Moving forward, Mr Thomas, to the post-prandial</p> <p>7 evidence -- we'll see what exactly happened with</p> <p>8 Mr Dacre and others, but we can start with the PCC now</p> <p>9 before lunch. You introduced this in paragraph 39 of</p> <p>10 your first witness statement. Under our tab 1, it's</p> <p>11 page 00269.</p> <p>12 A. Sorry, I missed which paragraph.</p> <p>13 Q. Paragraph 39. You deal with this towards the end of</p> <p>14 your witness statement, but I feel that we should bring</p> <p>15 it in now.</p> <p>16 A. Yes.</p> <p>17 Q. It kicks off with a letter you write on 4 November 2003,</p> <p>18 and this was, in terms of the advice notes we've seen,</p> <p>19 between the attendance note of 20 October 2003, which we</p> <p>20 saw in the legal advice file, and counsel's formal</p> <p>21 advice of 22 December.</p> <p>22 The letter itself is RJT3 under our tab 8,</p> <p>23 page 00360. I'll paraphrase it. He's just been</p> <p>24 appointed as its chairman of the PCC. You congratulate</p> <p>25 him, you ask for an early meeting. You refer to</p> <p style="text-align: center;">Page 113</p>	<p>1 sentence as a threat. It may have been somewhat</p> <p>2 overstating the case, and I think, you know, we've</p> <p>3 established that this morning.</p> <p>4 Q. Okay.</p> <p>5 A. But nevertheless I've stressed here because I did want</p> <p>6 to demonstrate to you that the possibility of</p> <p>7 prosecuting journalists was still very much live.</p> <p>8 Q. I think we've been over that one, but in terms of what</p> <p>9 happened next, there was a meeting on 27 --</p> <p>10 LORD JUSTICE LEVESON: Are you moving from the letter?</p> <p>11 Because there's one question I would like to ask about</p> <p>12 the letter.</p> <p>13 MR JAY: Please.</p> <p>14 LORD JUSTICE LEVESON: Could you go back to 00360, please</p> <p>15 Mr Thomas. It's the fourth paragraph:</p> <p>16 "You'll doubtless also be aware that I submitted</p> <p>17 a memorandum setting out the extent to which my role</p> <p>18 touched upon matters covered by the committee's</p> <p>19 enquiries. In addition, I had an informed meeting with</p> <p>20 the committee. I was at pains to make clear that though</p> <p>21 I do not wish to usurp your role as the regulator of the</p> <p>22 press ..."</p> <p>23 My question is: what are you relying on as</p> <p>24 concluding that the Press Complaints Commission was</p> <p>25 a regulator? You're a regulator, but you've concluded</p> <p style="text-align: center;">Page 115</p>
<p>1 Section 55. You refer to the ongoing investigation.</p> <p>2 You say at the bottom of this first page you anticipate</p> <p>3 prosecuting a number of individuals in due course.</p> <p>4 The top of the next page:</p> <p>5 "At the moment, I am waiting while the police</p> <p>6 investigate serious offences relating to corruption."</p> <p>7 Then, three lines down on the second page:</p> <p>8 "It's clear from the very considerable volume of</p> <p>9 material that our investigations have collected that</p> <p>10 journalists from most national newspapers and many</p> <p>11 periodicals are significant customers."</p> <p>12 And then this is the bit you've read out:</p> <p>13 "I am considering whether to take action under the</p> <p>14 DPA against individual journalists and/or newspapers."</p> <p>15 And that's something you wished to stress earlier.</p> <p>16 That was really a threat, though, wasn't it, Mr Thomas,</p> <p>17 to Sir Christopher and a threat which I would suggest</p> <p>18 you weren't really going to exercise by then, were you?</p> <p>19 A. I certainly didn't see it as a threat. It was meant to</p> <p>20 be a constructive and friendly opening in my engagement</p> <p>21 with the Press Complaints Commission.</p> <p>22 Q. There's no reason why you shouldn't have made the</p> <p>23 threat.</p> <p>24 A. Well, I wasn't threatening. I was simply putting him in</p> <p>25 the picture. So I certainly wouldn't characterise that</p> <p style="text-align: center;">Page 114</p>	<p>1 here that they're a regulator, or asserted that they're</p> <p>2 a regulator. I'm just interested to investigate your</p> <p>3 understanding of that.</p> <p>4 A. I'm glad you raised that because I think it goes, in</p> <p>5 many ways, fundamentally to the heart of some of the</p> <p>6 issues you're going to be dealing with.</p> <p>7 LORD JUSTICE LEVESON: That's why I raised it.</p> <p>8 A. They call themselves -- called themselves</p> <p>9 a self-regulatory body. They have said for many, many</p> <p>10 years and still say that it is really important to have</p> <p>11 self-regulation of the press rather than statutory</p> <p>12 regulation. We're familiar with those arguments.</p> <p>13 At that time, when I wrote this letter, in all my</p> <p>14 dealings with the PCC I certainly saw them as</p> <p>15 a regulator. But I have to say that my view now is that</p> <p>16 they are much more a complaint handler, and I draw</p> <p>17 a distinction between complaint-handling schemes and</p> <p>18 regulators. And regulators tend to be</p> <p>19 intelligence-driven, proactive, mainly focused on either</p> <p>20 prevention or punishment; complaint handlers are</p> <p>21 investigating complaints.</p> <p>22 I suppose I have reached the view, chairman, that</p> <p>23 that letter reflected my thinking at the time, I'd</p> <p>24 understood them to be a regulator, but perhaps we were</p> <p>25 at cross purposes.</p> <p style="text-align: center;">Page 116</p>

29 (Pages 113 to 116)

<p>1 I had dealt a lot in my previous career with the 2 Advertising Standards Authority, and I had regarded that 3 as a model of good good self-regulation. 4 I had been the architect of the banking and 5 insurance ombudsmen schemes, which were self-regulatory 6 and the governance arrangements there were modelled upon 7 the Advertising Standards Authority, and I had in my 8 mind associated the Press Complaints Commission with the 9 same sort of approach as the Advertising Standards 10 Authority: able to intervene and take action to prevent 11 unacceptable behaviour. And that was my expectation 12 when I had gone to see Sir Christopher Meyer. 13 I think over time I was somewhat disappointed. 14 Although I don't decry everything they did, it fell 15 short of what I'd hoped they might be doing. 16 So using that sentence in that letter, "your role as 17 a regulator", that was my perception, somebody of some 18 experience in these matters, that they were holding 19 themselves out as a regulator of the press, and I think 20 in fact they were more of a complaint handler. 21 LORD JUSTICE LEVESON: Was that perception ever the subject 22 of discussion or in any sense was the role of the PCC 23 more fully described so that you could correct your 24 perception? 25 A. I certainly had three or four meetings with</p> <p style="text-align: center;">Page 117</p>	<p>1 we thought, you know, the focus really was on stopping 2 this market, how can we stop this sort of unacceptable 3 activity carrying on? And they are supposed to be in 4 charge of the press, they ought to know what's going on. 5 We're constrained to some extent because the 6 prosecutions are still under way, I can't share too much 7 information with them, quite apart from the section 59 8 problems, which we'll come onto later, but I felt 9 I could go and tell them as much as I could about what 10 was going on and see what their reaction was going to 11 be. 12 Q. There was a meeting set up for 27 November. In order to 13 prepare for that meeting, you compiled a speaking note, 14 which is RJT5 under our tab 10, 00363. I'm not sure 15 that any specific points arise out of the note, save 16 that you appear to have had at your fingertips then the 17 nature and the quality of the evidence under the fourth 18 bullet point, "The resultless of our investigations"? 19 A. By this time I was much more focused on -- this was -- 20 I think probably I prepared this note myself, from what 21 I've been told. I don't think this was drafted for me, 22 this was my own note, and clearly by that time I wanted 23 to have the information to share with the PCC about the 24 nature and the scale of this. 25 The bottom two bullet points are, you know: what</p> <p style="text-align: center;">Page 119</p>
<p>1 Sir Christopher Meyer and we've probably touched on some 2 of these matters. 3 My meeting with Les Hinton of News International 4 when he was then the chairman of the Editors' 5 Committee -- although I don't think he's an editor, by 6 the way, that's why I perhaps was confused -- but in 7 that conversation I can recall saying, you know, "Why 8 can't you transform and change the Press Complaints 9 Commission to make it look more like the effective 10 self-regulation models I've encountered elsewhere?" 11 My last paragraph of my statement, I'm happy to 12 elaborate on some of that now or later. 13 MR JAY: At the end, Mr Thomas. 14 LORD JUSTICE LEVESON: Doubtless we'll come it, but while we 15 were looking at the letter, I just -- 16 A. No, I think that's absolutely fair, and I did see them 17 and they held themselves out as a regulator and I think 18 experience showed that they were not a regulator in the 19 conventional sense. 20 MR JAY: The purpose of going to them, as was clearly from 21 counsel's advice, was to permit them to get their house 22 in order, is that -- 23 A. That is a very fair summary of exactly what I and 24 everyone else hoped they would do, and to some extent it 25 was successful. I think they could have done more. But</p> <p style="text-align: center;">Page 118</p>	<p>1 could we expect from the PCC? Can we have a general 2 condemnation? Will this lead to change in the code of 3 practice? 4 Then the meeting took place -- 5 Q. RJT54. 6 A. Sorry? 7 Q. It's at RJT54. Your notes of the meeting. 8 A. Well, yes. That's my handwritten note of the meeting. 9 What I have not tracked down, nor has my former office, 10 is the official note of the meeting. There was an email 11 from me to my colleagues, including -- 12 Q. But this will do, Mr Thomas, because this is a note you 13 were taking at the time -- 14 A. Yes, indeed. 15 Q. -- so it's probably the best -- 16 A. Fine. 17 LORD JUSTICE LEVESON: We will want to go to the email, 18 though, because it's actually quite instructive. 19 MR JAY: Can we identify all the evidence which bears on the 20 meeting? 21 A. Yes. 22 Q. We have the note, am I right in saying you took this at 23 the time, at RJT54? 24 A. Yes. 25 Q. And then there's the email which followed it. Is it</p> <p style="text-align: center;">Page 120</p>

<p>1 RJT6? 2 A. Yes. 3 Q. Our tab 11? 4 A. Which was written presumably shortly after the meeting; 5 is that right? 6 A. Well, that evening (overspeaking) at 5 o'clock, 5.17 7 that evening. 8 MR JAY: Noting the time, may I go through these materials 9 after lunch? 10 LORD JUSTICE LEVESON: Certainly, yes. 2 o'clock. 11 (1.00 pm) 12 (The short adjournment) 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 121</p>	

<b>A</b>	47:23 65:12 87:11	<b>aiding</b> 10:6	<b>appear</b> 70:1 119:16	55:23 83:21	22:3 24:25	73:15 74:22
<b>abandon</b> 74:23 95:14	<b>add</b> 17:24	<b>airthmetic</b> 89:19	<b>appeared</b> 13:18 90:16,16,24 91:17 93:16	<b>aspects</b> 29:25 54:13	44:1 46:18 49:3 59:15 65:20 71:24 80:20 103:10 107:3 108:25 110:4 111:10 113:3 115:14	75:5 78:22,25 82:15 87:18
<b>abandoned</b> 74:20	<b>added</b> 84:6,8	<b>Aldhouse</b> 9:1 22:23 28:8 29:4,21 31:11 34:23 35:2	<b>appears</b> 40:23 52:12,19,25 58:2 70:5 83:1 84:3 85:3 90:10 104:25	<b>asserted</b> 116:1	80:20 103:10	<b>blagger</b> 31:16 101:4
<b>abetting</b> 10:7	<b>addition</b> 72:7 115:19	<b>Aldhouse's</b> 29:14	<b>appearance</b> 40:23 52:12,19,25 58:2 70:5 83:1 84:3 85:3 90:10 104:25	<b>asserts</b> 104:23	107:3 108:25 110:4 111:10 113:3 115:14	<b>blagging</b> 108:1
<b>able</b> 57:12 69:10 87:5 95:20 99:21 117:10	<b>address</b> 13:7 54:12 109:19 109:25 110:2,3	<b>Alec</b> 30:10 52:6	<b>applied</b> 19:8	<b>assessment</b> 21:13	110:4 111:10 113:3 115:14	<b>blocking</b> 18:5
<b>absolutely</b> 9:2 12:7 33:16 35:11 37:13 48:24,25 52:19 52:24 54:17 57:16 58:16 59:19 62:5 81:22 89:7 97:19 99:10 118:16	<b>addressed</b> 64:4 68:20	<b>alert</b> 53:10	<b>apply</b> 40:3 109:12	<b>assist</b> 29:18 87:8	<b>background</b> 24:22 25:7,13 26:6	<b>board</b> 5:16
<b>AC</b> 28:20	<b>addresses</b> 99:11 99:17 105:2,8 106:8 109:18	<b>alight</b> 15:23	<b>appointed</b> 5:3 113:24	<b>assistant</b> 28:21 28:22	<b>bailiwick</b> 42:8 42:10	<b>bogged</b> 69:15
<b>accept</b> 69:11 74:19,20 75:2 82:8 86:5 108:4	<b>addressing</b> 77:22	<b>alive</b> 36:24 61:7 61:12	<b>application</b> 18:9	<b>associated</b> 3:18 105:25 112:22 117:8	<b>balance</b> 13:5	<b>bogus</b> 46:11
<b>access</b> 17:25 24:12 77:1	<b>adequate</b> 85:5	<b>allegation</b> 69:23	<b>applied</b> 19:8	<b>associates</b> 33:11 35:15	<b>bank</b> 24:6	<b>boiled</b> 97:9
<b>accesses</b> 76:23	<b>adjourment</b> 121:12	<b>allow</b> 47:18	<b>apply</b> 40:3 109:12	<b>association</b> 5:14 5:17 111:2	<b>banking</b> 117:4	<b>books</b> 27:10
<b>account</b> 2:3 24:6	<b>Administrative</b> 5:9	<b>allowance</b> 58:21	<b>appointing</b> 28:22	<b>assumed</b> 34:19	<b>banks</b> 98:19	<b>bottom</b> 51:3,7 53:21 57:1 79:18 86:22 92:9 114:2 119:25
<b>accurately</b> 83:19 109:10	<b>admitted</b> 26:2	<b>allowing</b> 37:11 62:21	<b>appointment</b> 28:20,21	<b>assuming</b> 61:18	<b>bargaining</b> 79:5	<b>boxes</b> 30:22
<b>acquired</b> 28:6	<b>adopt</b> 3:10	<b>alongside</b> 32:12 67:5	<b>appreciate</b> 1:20 12:18	<b>assumption</b> 45:3 45:4 47:1	<b>barrel</b> 68:16 70:14	<b>Boyll</b> 52:11 84:14
<b>Act</b> 5:23,25 6:2 6:22 7:4,20,25 8:18,23,25,25 10:25 14:2,11 15:11 18:9 19:15,24,25 20:24 21:4,10 59:24 63:16 84:14 86:14 88:12 92:14 94:21,23	<b>Advertising</b> 117:2,7,9	<b>alternative</b> 48:20	<b>appreciated</b> 53:2	<b>attain</b> 86:12	<b>barrister</b> 62:11 83:23	<b>brand</b> 46:8
<b>access</b> 17:25 24:12 77:1	<b>advice</b> 4:24 6:15 12:13 37:25	<b>alternatively</b> 47:11	<b>approach</b> 46:8 59:10 64:2,6 66:8 117:9	<b>attempt</b> 8:5 102:9	<b>base</b> 110:14	<b>breach</b> 50:4 76:22,24 84:24 87:2 88:12 89:3 96:9
<b>accesses</b> 76:23	<b>advised</b> 71:23 80:16	<b>altogether</b> 30:7 70:2 90:17	<b>approached</b> 68:11	<b>attend</b> 52:4	<b>based</b> 5:12	<b>breached</b> 21:9
<b>account</b> 2:3 24:6	<b>adviser</b> 6:12	<b>amended</b> 83:7 84:13 103:21	<b>appropriate</b> 17:18 35:9 63:18 79:6	<b>attendance</b> 39:19 51:25 113:19	<b>basis</b> 2:3 4:25	<b>breaches</b> 42:25 75:15 90:2
<b>accurately</b> 83:19 109:10	<b>advisers</b> 12:13	<b>amendment</b> 8:22 63:8	<b>April</b> 74:14 79:1 80:10 81:4 84:12	<b>attended</b> 52:5 87:18	<b>bear</b> 66:7 87:15 97:1	<b>breaching</b> 24:18 93:5
<b>acquired</b> 28:6	<b>advising</b> 55:1 65:25 66:16	<b>amount</b> 15:21 89:11	<b>architect</b> 117:4	<b>attention</b> 25:12 29:7 51:7 57:19 72:12 90:23,24 96:23	<b>bearing</b> 66:7 87:15 97:1	<b>break</b> 61:23 64:23
<b>Act</b> 5:23,25 6:2 6:22 7:4,20,25 8:18,23,25,25 10:25 14:2,11 15:11 18:9 19:15,24,25 20:24 21:4,10 59:24 63:16 84:14 86:14 88:12 92:14 94:21,23	<b>advisors</b> 12:13	<b>amounted</b> 26:16 79:22	<b>area</b> 70:7 86:5	<b>attended</b> 52:5 87:18	<b>bears</b> 77:24 120:19	<b>breakdown</b> 111:25
<b>action</b> 23:8 24:25 33:2 63:15 65:16,17 67:16 69:17,20 75:22 79:11 80:9 114:13 117:10	<b>advising</b> 55:1 65:25 66:16	<b>amounting</b> 86:1	<b>arguable</b> 105:18	<b>attending</b> 39:19 51:25 113:19	<b>beginning</b> 49:12 75:10	<b>breaking</b> 51:22 77:2
<b>active</b> 30:4 39:16 40:9 51:15	<b>advising</b> 55:1 65:25 66:16	<b>amounts</b> 24:2 93:3	<b>argue</b> 69:9	<b>attracted</b> 80:25	<b>behalf</b> 92:20	<b>brief</b> 62:12
<b>actively</b> 38:16 39:8,10,11 65:16 70:19 83:25 86:25	<b>advising</b> 55:1 65:25 66:16	<b>analysed</b> 9:7	<b>argument</b> 9:16 18:15	<b>attributed</b> 34:25	<b>behaviour</b> 70:6 75:8 117:11	<b>briefed</b> 24:15 68:15
<b>activities</b> 7:1 22:12 24:1 35:24	<b>advising</b> 55:1 65:25 66:16	<b>ancillary</b> 14:9	<b>arguments</b> 116:12	<b>attributing</b> 105:23	<b>behaviour</b> 70:6 75:8 117:11	<b>briefing</b> 26:22
<b>activity</b> 32:5 33:23 34:4 53:23 67:6 69:22 75:21 99:18 100:4,21 104:25 119:3	<b>advising</b> 55:1 65:25 66:16	<b>Andrew</b> 111:11	<b>arises</b> 14:9 104:11	<b>audit</b> 31:14,22 46:14	<b>behaviour</b> 70:6 75:8 117:11	<b>briefings</b> 24:21 50:21
<b>actors</b> 8:13 42:14	<b>advising</b> 55:1 65:25 66:16	<b>and/or</b> 63:17 114:14	<b>armed</b> 68:15	<b>August</b> 72:3	<b>behaviour</b> 70:6 75:8 117:11	<b>briefly</b> 26:25 103:7
<b>acts</b> 6:4,9,12	<b>advising</b> 55:1 65:25 66:16	<b>annex</b> 72:10	<b>arose</b> 84:19	<b>authority</b> 12:13 75:13 117:2,7 117:10	<b>behaviour</b> 70:6 75:8 117:11	<b>bring</b> 23:6 34:8 42:22,24 80:5 80:21 96:22 113:14
<b>actual</b> 18:20	<b>advising</b> 55:1 65:25 66:16	<b>answer</b> 47:17 54:23 77:4,9 78:7 86:14	<b>arrangements</b> 21:24 29:1 117:6	<b>automated</b> 18:4	<b>behaviour</b> 70:6 75:8 117:11	<b>bringings</b> 39:3 43:16 51:17 69:21 72:8 74:6
	<b>advising</b> 55:1 65:25 66:16	<b>answered</b> 91:9	<b>arrival</b> 23:6	<b>available</b> 8:21 15:9 22:8 103:1	<b>behaviour</b> 70:6 75:8 117:11	<b>brings</b> 42:3 72:4 <b>British</b> 84:21 96:16 106:9
	<b>advising</b> 55:1 65:25 66:16	<b>answering</b> 77:8	<b>arrive</b> 16:22 87:7	<b>awaiting</b> 42:6	<b>behaviour</b> 70:6 75:8 117:11	<b>broad</b> 8:16 12:3 90:14 112:6
	<b>advising</b> 55:1 65:25 66:16	<b>answers</b> 90:9 98:3,3 110:13	<b>arrived</b> 22:25 26:19 30:12	<b>aware</b> 9:23 10:4 23:25 24:23 25:7,8 26:18 38:15 39:8,11 39:21 40:6 41:11 44:23,24 50:17,20 54:17 98:19 115:16	<b>behaviour</b> 70:6 75:8 117:11	<b>broadly</b> 7:18 45:18
	<b>advising</b> 55:1 65:25 66:16	<b>anticipate</b> 63:25 69:13 114:2	<b>Article</b> 67:18 68:20	<b>awareness</b> 20:11 37:8 55:17 66:9 112:6	<b>behaviour</b> 70:6 75:8 117:11	<b>brought</b> 9:18 42:5 48:7 57:19 76:4 83:11 112:5
	<b>advising</b> 55:1 65:25 66:16	<b>antithetical</b> 5:21	<b>ascertain</b> 19:7	<b>back</b> 8:18 21:14	<b>behaviour</b> 70:6 75:8 117:11	<b>BT</b> 68:8
	<b>advising</b> 55:1 65:25 66:16	<b>anybody</b> 12:5 36:7,15 39:11 49:2 80:7 88:18 97:13 111:21	<b>aside</b> 65:24		<b>behaviour</b> 70:6 75:8 117:11	<b>building</b> 23:2
	<b>advising</b> 55:1 65:25 66:16	<b>anyone's</b> 61:8 97:17	<b>asked</b> 9:25 33:22 62:7 68:9 75:10 82:15 89:4 94:22,24 110:11 111:14 111:25 112:1		<b>behaviour</b> 70:6 75:8 117:11	<b>build-up</b> 110:20
	<b>advising</b> 55:1 65:25 66:16	<b>apart</b> 17:14 89:14 111:20 119:7	<b>asking</b> 19:15 88:13,18 107:14		<b>behaviour</b> 70:6 75:8 117:11	
	<b>advising</b> 55:1 65:25 66:16	<b>apologies</b> 1:22	<b>aspect</b> 54:5		<b>behaviour</b> 70:6 75:8 117:11	
	<b>advising</b> 55:1 65:25 66:16	<b>apologise</b> 1:4,21 113:5			<b>behaviour</b> 70:6 75:8 117:11	
	<b>advising</b> 55:1 65:25 66:16	<b>apologising</b> 1:18			<b>behaviour</b> 70:6 75:8 117:11	
	<b>advising</b> 55:1 65:25 66:16	<b>apology</b> 103:15			<b>behaviour</b> 70:6 75:8 117:11	



<b>bulk</b> 25:24 34:12	56:9,9,10,11	<b>charge</b> 119:4	<b>Clifford</b> 5:5	<b>committee</b> 25:10	51:16 57:23	<b>considering</b>
<b>bullet</b> 106:14	57:7 69:3,3	<b>charged</b> 22:17	<b>close</b> 95:4,19	26:8,14 63:19	82:2 83:6	39:11 52:18
109:15 119:18	82:1 93:6 95:5	45:19 99:14	<b>closely</b> 7:16	64:3 76:10,12	105:13	63:15 65:16
119:25	104:1 105:2	101:5 109:7	15:16 49:22	76:18 81:13	<b>concerns</b> 20:7	114:13
<b>bundle</b> 8:8 25:5	<b>cast</b> 77:18	<b>charges</b> 38:17	77:23	85:25 86:7	23:19	<b>consisted</b> 105:2
70:23 84:5	<b>catalogue</b> 26:16	39:7 52:12	<b>closer</b> 47:22	101:11 111:11	<b>concluded</b> 26:15	<b>consistent</b> 64:2,7
<b>Bureau</b> 4:24	<b>categorically</b>	83:11	<b>code</b> 46:9 63:19	112:13,16	115:25	64:17 66:12
<b>buried</b> 108:9	94:17 95:20	<b>chart</b> 27:1	64:1 72:11	115:20 118:5	<b>concluding</b>	74:18 92:13
<b>business</b> 54:12	108:24	<b>chase</b> 22:13	112:13,16	<b>committee's</b>	115:24	<b>consists</b> 112:16
55:2 98:13	<b>categories</b>	<b>check</b> 13:2	120:2	115:18	<b>conclusion</b> 60:24	<b>conspiracy</b> 83:6
102:22	101:23	100:11,22	<b>coherent</b> 23:9	<b>committing</b>	63:17 104:23	83:11,15 84:1
<b>businesses</b> 99:3	<b>category</b> 89:24	104:2 109:6	<b>colleagues</b> 30:22	93:11 94:7	105:5	84:2 85:18
<b>buying</b> 93:3	109:15,17	<b>checks</b> 99:1,13	120:11	<b>common</b> 30:15	<b>condemnation</b>	<b>constitute</b> 87:2
	<b>cause</b> 55:24	99:19	<b>collected</b> 114:9	109:12 110:1	120:2	88:12 89:3
<b>C</b>	<b>caused</b> 1:21	<b>cherry</b> 56:8	<b>collectively</b>	<b>commonly</b> 6:7	<b>conditional</b>	<b>constituted</b>
<b>c</b> 16:7,23 17:7	<b>causing</b> 46:13	<b>Christmas</b> 58:21	111:4,6	<b>communicating</b>	73:16 76:5	84:11
39:24 40:3	<b>central</b> 18:7	<b>Christopher</b>	<b>colour</b> 40:4	36:9	81:15	<b>constitutes</b> 1:16
<b>call</b> 7:18 45:19	34:10 36:1,8	57:22 58:12	<b>come</b> 6:2 11:5,19	<b>companies</b> 24:9	<b>conduct</b> 41:12,15	<b>constrained</b>
64:17 79:15	42:23	60:15 61:1	21:2 27:24	41:15 98:20	<b>conference</b> 39:17	119:5
97:17 101:18	<b>Centre</b> 5:12	62:17 63:6	29:7 32:17	105:9 109:3	68:3 71:22	<b>constructive</b>
110:5 116:8	<b>certain</b> 6:4 27:17	114:17 117:12	36:21 37:24	<b>company</b> 106:22	81:9,25	114:20
<b>called</b> 5:11 116:8	73:18	118:1	39:15,19,23	109:20	<b>confidential</b>	<b>consultant</b> 5:11
<b>calls</b> 25:23	<b>certainly</b> 7:15	<b>chronological</b>	40:16 41:6	<b>comparing</b> 36:6	12:23 23:15	<b>consumer</b> 5:2,3
112:25	9:1,7 11:13	4:11 73:12	50:24 51:12	<b>compel</b> 43:21	26:4 31:18	5:14
<b>campaigned</b>	12:3,16 18:19	<b>chronologically</b>	53:13 55:15,16	<b>compiled</b> 106:24	32:10 35:16	<b>contact</b> 12:19
108:12	23:22 24:4	27:14	57:14,22 59:11	119:13	38:25 74:7	18:16
<b>car</b> 97:14 101:17	31:9 32:3 33:5	<b>circularities</b> 6:5	62:11 65:20	<b>complaint</b>	87:24 106:17	<b>contacting</b> 18:24
109:18	34:17 35:1	<b>circumscribed</b>	69:25 71:24	116:16,20	<b>confidentiality</b>	<b>contained</b> 80:2
<b>card</b> 8:20	37:15,23 39:6	7:19	75:22 80:1	117:20	50:4	<b>contemplate</b>
<b>cardboard</b> 30:22	44:5 53:15	<b>circumstance</b>	88:21 90:12	<b>complaints</b> 25:6	<b>confine</b> 35:17	74:5
<b>Cardiff</b> 46:6	54:15 61:8,21	61:22	106:2 107:3	38:3 40:8	<b>confirm</b> 6:17	<b>contemplated</b>
<b>cards</b> 46:4	64:25 65:21	<b>circumstances</b>	110:17,24	45:16 59:13	<b>confirmed</b> 70:13	74:14
<b>care</b> 1:25	79:6 93:19	10:19 11:10	118:14 119:8	62:8,22 63:19	70:15	<b>content</b> 80:1
<b>career</b> 4:14,17	96:10,11 100:5	12:4 13:1 17:9	<b>comes</b> 54:19 96:4	69:16 72:11	<b>conflated</b> 38:4	<b>context</b> 5:22
117:1	106:10,18,22	18:3 84:20	<b>comfortable</b>	75:17 111:1	<b>confused</b> 38:4	14:10,20 27:11
<b>careful</b> 41:6	114:19,25	<b>citizen</b> 97:9	1:10	114:21 115:24	118:6	41:2 58:18
<b>carefully</b> 95:17	116:14 117:25	<b>Citizens</b> 4:24	<b>coming</b> 46:19,21	116:21 117:8	<b>congratulate</b>	63:12 69:5
<b>carried</b> 48:15	121:10	<b>claim</b> 105:1	55:4 67:18	118:8	113:24	83:5 92:12
<b>carries</b> 42:17	<b>certainty</b> 93:14	106:8	95:4,19	<b>complaint-han...</b>	<b>congratulating</b>	98:4,17,21,22
<b>carry</b> 6:9 44:5	<b>cetera</b> 38:22	<b>claiming</b> 111:8	<b>command</b> 22:20	21:7 116:17	32:24	<b>continue</b> 3:9
47:12 79:9	<b>chain</b> 22:20	<b>class</b> 37:18	22:24	<b>complementary</b>	<b>connect</b> 18:19	<b>continues</b> 34:9
<b>carrying</b> 46:15	36:11	<b>classifications</b>	<b>comment</b> 29:17	6:6	<b>connections</b>	<b>contravened</b>
119:3	<b>chairman</b> 1:18	90:20	111:16,17	<b>completed</b> 27:15	24:20	14:24
<b>case</b> 12:4,18 13:1	5:8,14 59:18	<b>classified</b> 90:14	<b>commission</b> 4:18	28:13	<b>connects</b> 31:24	<b>contravening</b>
25:2 30:9 34:8	80:11 113:24	<b>clear</b> 12:7 28:18	25:6 38:3 40:8	<b>completely</b> 47:20	<b>conscious</b> 65:17	14:24
38:6 39:22	116:22 118:4	34:17 40:13	45:16 46:14	74:24 75:6	70:22 95:14	<b>contravention</b>
40:1,7,13,23	<b>challenge</b> 34:11	44:9 48:25	59:13 62:8,22	<b>complexity</b>	<b>consent</b> 9:20	15:14
41:12,16 42:18	54:20 65:19	54:19 58:16	63:19 69:17	15:22	105:11	<b>controller</b> 6:22
46:19 50:23	<b>challenged</b> 15:6	60:23 61:6	72:11 75:17	<b>compliance</b> 17:9	<b>consenting</b>	6:25 7:4 9:21
52:19,25 56:14	15:6 67:16	63:12 75:4,19	92:11 111:1	<b>complicated</b>	108:10	14:24 15:5
57:6 61:8,21	82:6	78:1 79:4 81:3	114:21 115:24	7:24 16:2	<b>consequences</b>	17:1,8,20 18:2
65:14 66:1,17	<b>challenges</b> 39:3	81:12 84:9	117:8 118:9	21:12	15:24 73:18	19:4,10,16
66:20,23 68:9	<b>challenging</b> 82:3	87:3 91:12	<b>commissioned</b>	<b>composed</b> 21:17	<b>consider</b> 110:13	105:11
68:11 71:17,18	<b>chance</b> 5:5 59:13	97:4 101:15	76:24	<b>computer</b> 56:10	<b>considerable</b>	<b>controllers</b> 6:23
73:6,6 74:16	67:3	114:8 115:20	<b>commissioner</b>	69:2	114:8	17:18 19:23
76:3 79:11	<b>change</b> 118:8	<b>clearer</b> 108:13	5:7,19 6:8 7:22	<b>concentrate</b>	<b>consideration</b>	20:1,10 21:25
80:7 82:6	120:2	<b>clearly</b> 1:24 10:3	11:7 19:22	54:21	38:15 39:8,16	<b>controversy</b> 11:3
83:15 84:19,23	<b>changed</b> 21:24	30:23 36:23	20:16 23:20	<b>concentrated</b>	40:9,11 43:6	<b>convenient</b> 44:2
85:6 86:1	22:6 69:19	37:2 44:17,23	24:15 25:9	2:22	45:9 51:15	51:23 58:10
90:18 93:9	<b>changes</b> 23:6	55:4 57:18	28:21,23 29:21	<b>concern</b> 8:22	61:3,18 74:11	64:20 102:2
94:9 95:25	30:3	59:19 62:20	37:17 59:21,23	34:14 61:23	<b>considerations</b>	<b>conventional</b> 9:8
98:1 99:17	<b>characterisation</b>	66:8 70:3 91:5	59:24 74:5	<b>concerned</b> 5:22	40:2 59:5,15	118:19
106:3,22,24	79:21 85:25	100:1 110:22	<b>committed</b> 14:13	5:23 9:12 13:3	60:11,20,21	<b>conversation</b>
109:1 112:24	<b>characterise</b>	112:8 118:20	43:9 91:4,5,15	23:23 24:11	<b>considered</b> 54:4	28:7,10 45:10
115:2	114:25	119:22	93:10,14 94:14	26:5 38:13	70:19 72:19	57:10 67:13
<b>cases</b> 7:23 19:15	<b>characterised</b>	<b>clients</b> 25:25	94:18 105:24	40:3 41:21	90:4 92:10	112:11 118:7
22:13,17 42:5	88:10	92:20	106:4,6,23,25	43:10 45:18	102:4	<b>conversations</b>

12:11 111:23 <b>conversion</b> 110:5 <b>conveyed</b> 83:19 83:24 <b>conveying</b> 50:11 <b>convicted</b> 93:6 <b>conviction</b> 76:8 78:24 79:1 89:8,11 90:19 93:18 95:16 <b>convictions</b> 83:16 88:17,24 <b>convinced</b> 48:9 <b>copies</b> 4:1 <b>copy</b> 76:12 87:11 96:15 <b>core</b> 82:21 <b>cornerstone</b> 20:2 <b>corporation's</b> 59:23 <b>correct</b> 1:16 2:16 2:20,21 3:13 3:14,19,20,23 3:24 5:25 6:17 10:23,25 11:1 14:8,14,15 16:15,16 17:14 19:5 22:4,23 22:24 28:4 33:1,5 34:16 37:12 41:1 70:18 79:21 81:8 85:21,24 93:1 104:7 105:21 117:23 <b>corrected</b> 103:12 <b>correction</b> 103:3 104:5 <b>correctly</b> 49:9 79:14 <b>corrupt</b> 35:15 109:2 110:2 <b>corruption</b> 38:21 41:13,21 42:16 52:13 79:2 83:6 84:2,18 114:6 <b>cost</b> 38:1 54:20 56:6 57:8 61:25 65:24 97:16,17,18 <b>Coulson</b> 111:11 <b>Council</b> 5:2,9 <b>counsel</b> 38:1 39:17 43:8 52:1,3 54:7 55:1,7,8,9 56:1 56:23 57:5,11 58:25 65:24 66:16 67:21 68:3,8,9,13 70:24 71:23 80:24 81:9,25 82:9 87:19 <b>counsel's</b> 54:1,7 54:12 56:21 58:7 64:25	81:21 113:20 118:21 <b>country</b> 97:9 <b>couple</b> 52:23 58:23 <b>course</b> 3:5,8 8:13 8:24 14:1 15:7 21:19 27:1 32:20 33:2,25 37:20 47:11 62:1 65:24 69:17,19 70:12 71:4 73:18,21 75:25,25 78:12 79:24 80:10 82:21 84:19 85:17 86:2 102:22 106:20 111:10 114:3 <b>court</b> 10:5 14:5 67:14,18 73:15 78:22,25 80:21 81:1 83:20 89:9 90:19 95:21 97:14 106:11 <b>courts</b> 80:20 <b>cover</b> 4:10 5:20 7:10,13 10:14 15:12 32:23 86:15 <b>covered</b> 94:23 115:18 <b>co-operate</b> 19:16 41:25 <b>CPS</b> 38:17 42:22 68:10 83:23 85:5,6 <b>crafted</b> 100:17 100:18 <b>creation</b> 23:8 <b>credit</b> 8:20 <b>cribsheet</b> 8:3 16:2,17 <b>criminal</b> 8:12,23 11:4 14:10,20 15:7 22:14 41:19 43:4,5,9 43:14,23 65:4 76:7 88:23 95:21 96:13 97:18 99:18,18 100:3,20 101:18 102:18 <b>criticised</b> 46:9 <b>criticism</b> 81:1 <b>criticisms</b> 85:13 <b>crops</b> 68:5 <b>cross</b> 116:25 <b>crosshairs</b> 50:14 <b>Crown</b> 41:17 42:19 73:15 78:22,25 84:13 84:25 <b>Culture</b> 76:11 <b>cumulative</b> 16:23	<b>current</b> 14:4 <b>currently</b> 5:8 52:10 100:9 <b>customary</b> 43:15 <b>customer</b> 101:4 101:5 109:7 <b>customers</b> 33:11 91:17 93:16 97:3 98:16 114:11 <b>Customs</b> 21:18 <b>cuts</b> 68:18 <hr/> <b>D</b> <hr/> <b>Dacre</b> 112:19,21 112:24 113:5,8 <b>Daily</b> 25:20 104:20 113:1 <b>data</b> 5:22 6:21 6:22,23,25 7:3 7:4,8,13 8:24 9:4,21 10:1,24 14:23,25 15:5 15:13,14,18 16:8 17:1,8,13 17:18,20 18:1 18:1,3,9 19:4,7 19:9,15,23 20:1,10 21:25 22:8 23:23 24:2,11,13 25:17 26:15 29:25 41:20 42:20 46:8 49:15 63:16 75:15 78:23 81:18 83:12,16 84:11,14,16,17 92:14 103:17 105:10,11 <b>database</b> 76:23 107:5 <b>databases</b> 23:24 24:5 69:24 77:1 <b>date</b> 31:3 <b>dated</b> 2:25 3:6 27:21 58:19 <b>dates</b> 38:4 <b>David</b> 50:5 <b>day</b> 2:18 11:16 82:7 97:8 112:11 <b>days</b> 5:10,10 30:19 31:4 56:23 108:9,20 <b>dead</b> 73:1,3 <b>deal</b> 11:3 26:25 34:22 38:12 63:20 70:10 76:1,4 85:7 103:7 108:20 110:22 113:13 <b>dealers</b> 36:6 <b>dealing</b> 15:18 17:5 32:13 46:17 87:19	104:19 109:16 116:6 <b>dealings</b> 116:14 <b>deals</b> 3:3,7,12,17 3:22 5:18 <b>dealt</b> 72:15 111:3 117:1 <b>debate</b> 9:23 46:3 <b>debates</b> 36:3 <b>December</b> 1:1 3:21 25:21 58:7,12 65:1 65:25 113:21 <b>decide</b> 80:21 <b>decided</b> 92:11 <b>decision</b> 37:21 37:23 43:18 47:10 48:4,21 70:22 73:19 74:9,12,19 81:4 85:16 <b>decisions</b> 47:12 <b>decry</b> 117:14 <b>dedicated</b> 98:14 <b>defence</b> 10:18 12:6,9 69:4 93:20,21 94:3 <b>defences</b> 94:1,4 <b>defendants</b> 93:25 <b>deficiency</b> 76:13 <b>defined</b> 10:24 <b>definite</b> 90:16 <b>definition</b> 94:20 <b>definitive</b> 9:22 <b>degrees</b> 101:24 <b>delay</b> 1:4 71:23 <b>delegate</b> 60:8 <b>delivering</b> 72:17 <b>delve</b> 11:21 <b>demand</b> 82:13 <b>demanding</b> 67:10 <b>demonstrate</b> 31:14,20 64:7 115:6 <b>demonstrates</b> 60:19 <b>denying</b> 111:12 <b>department</b> 39:14 <b>depending</b> 86:3 <b>depends</b> 96:4 <b>deplorable</b> 26:16 <b>deplore</b> 108:12 <b>deployed</b> 108:1,2 <b>depressing</b> 26:16 <b>depth</b> 43:23 <b>deputy</b> 5:14 29:6 29:9,21,22 <b>derived</b> 107:1 <b>deriving</b> 25:24 <b>describe</b> 3:17 6:7 31:15 77:15 79:12 <b>described</b> 31:7 89:24 117:23	<b>despite</b> 96:23 <b>destruction</b> 18:6 <b>detached</b> 23:2 <b>detail</b> 3:3,5 13:17 15:20 16:4 34:19 60:5 90:9 <b>detailed</b> 2:12 34:4 <b>details</b> 8:20 24:8 88:23,24,24 99:1 101:17 <b>detective</b> 25:17 94:21 <b>detectives</b> 25:22 84:20 <b>determines</b> 7:7 <b>developed</b> 65:14 <b>developing</b> 66:6 <b>diagram</b> 32:2 <b>dialled</b> 99:2,5 <b>diary</b> 27:9 <b>different</b> 5:20 23:1 101:21,23 <b>differentiate</b> 41:7 <b>difficult</b> 12:17,25 13:6 45:15 62:13 64:11 <b>difficulties</b> 70:17 96:23 <b>difficulty</b> 101:21 <b>digested</b> 52:24 <b>digesting</b> 77:7 <b>direct</b> 42:10 <b>direction</b> 65:2 94:17 <b>directive</b> 18:8 <b>director</b> 5:3,5 26:2 50:6 <b>directories</b> 107:18 <b>directory</b> 107:20 <b>disagree</b> 109:14 <b>disagreeing</b> 95:2 <b>disapplied</b> 17:14 17:21,22,24 18:2,6 <b>disapplies</b> 7:20 7:21 15:16 <b>disappointed</b> 117:13 <b>disappointment</b> 73:24 <b>discharge</b> 92:14 <b>discharges</b> 73:16 76:5 81:16 <b>Disclose</b> 9:11 <b>discloses</b> 8:14 <b>disclosing</b> 10:19 77:19 <b>disclosure</b> 8:15 85:5 92:12 <b>discontinue</b> 73:20 85:16 <b>discontinued</b> 78:19	<b>discovered</b> 40:22 <b>discuss</b> 29:10 80:1 <b>discussed</b> 9:6 33:20 45:11 <b>discusses</b> 39:20 <b>discussing</b> 33:17 57:4 <b>discussion</b> 39:18 45:10 48:11 65:11 117:22 <b>discussions</b> 36:2 112:9 <b>disengaged</b> 30:6 <b>disguise</b> 80:7 <b>dishonest</b> 42:16 <b>displaying</b> 110:7 <b>dispute</b> 6:13 21:7 <b>dissecting</b> 77:23 <b>dissemination</b> 5:24 20:8 <b>distinction</b> 91:2 92:23 116:17 <b>distinguish</b> 59:22 62:6 <b>district</b> 14:16 <b>division</b> 23:8 <b>document</b> 52:1 53:20 68:1 72:2 81:24 82:22 103:2 <b>documentary</b> 36:19 48:17 78:10 <b>documentation</b> 92:16 <b>documented</b> 25:11 81:10 87:23 97:13 102:19 <b>documents</b> 49:4 51:2 93:2 <b>doing</b> 16:21 22:4 26:21 41:7,9 41:19,20 44:18 47:1 50:17 56:6 75:20 86:9 96:24 111:9 117:15 <b>domain</b> 106:16 110:1 <b>domestically</b> 30:1 <b>doubt</b> 66:21 <b>doubtful</b> 107:10 <b>doubtless</b> 38:18 115:16 118:14 <b>dovetail</b> 6:5 <b>DPA</b> 87:2 90:2 114:14 <b>draft</b> 11:8,17 87:10,11 88:7 111:18 <b>drafted</b> 10:12 11:8 62:18 63:7 87:25 100:9 119:21	<b>drafts</b> 88:1 <b>draw</b> 25:12 28:5 28:11 51:7 90:23,24 116:16 <b>drawing</b> 72:12 92:22 <b>drawn</b> 105:6 110:8 <b>driving</b> 93:15 <b>drop</b> 82:1 <b>drug</b> 36:6 <b>due</b> 3:5 8:24 15:6 32:20 73:20 103:18 114:3 <b>duties</b> 6:9 19:21 <b>duty</b> 19:22 20:15 21:6 <b>DVLA</b> 38:22 41:14 84:21 106:9 109:20 110:3 <hr/> <b>E</b> <hr/> <b>earlier</b> 20:5 89:4 93:7 101:10 114:15 <b>early</b> 11:18 37:3 37:21,24 51:5 64:10 113:25 <b>earth-stopping</b> 32:16 <b>easier</b> 108:20 <b>easy</b> 80:6 <b>Edinburgh</b> 46:6 <b>editions</b> 107:18 <b>editor</b> 12:14 103:14 112:12 113:2 118:5 <b>editors</b> 56:12 72:10 110:9 111:3,16 112:9 112:10,17,20 118:4 <b>editor-in-chief</b> 113:1 <b>education</b> 6:14 24:9 <b>educator</b> 6:11 20:5 <b>effect</b> 7:20 35:2 41:11 42:2 54:23 64:10 <b>effective</b> 66:21 67:5 69:20 118:9 <b>effectively</b> 17:21 68:15 <b>effectiveness</b> 64:8 <b>effort</b> 80:19 <b>either</b> 27:21 28:18 35:24 36:22 37:17 46:25 47:10,18 54:6 89:19 99:15 106:21
---	---	--	--	--	---	--

112:6 116:19 <b>either/or</b> 48:1 <b>elaborate</b> 118:12 <b>elaborates</b> 4:7 <b>electoral</b> 99:13 <b>element</b> 9:14 <b>elementary</b> 47:13 <b>eliminated</b> 70:2 <b>eliminating</b> 67:6 <b>else's</b> 76:14 <b>email</b> 120:10,17 120:25 <b>emphasis</b> 75:19 <b>emphasise</b> 39:10 58:11 75:9 <b>employees</b> 26:3 38:22 <b>employers</b> 36:19 <b>employment</b> 46:8 <b>empty</b> 72:17 <b>enable</b> 80:14 <b>enabled</b> 110:13 <b>encountered</b> 69:1 118:10 <b>encounters</b> 75:17 <b>ended</b> 83:16 <b>endorse</b> 66:5 <b>endorsing</b> 54:23 <b>enforce</b> 50:15 <b>enforced</b> 50:3 <b>enforcement</b> 14:22 15:5,8 15:11,17 19:2 21:16 59:7 65:16 75:22 <b>enforcing</b> 41:19 45:20 <b>engage</b> 16:4 <b>engaged</b> 33:16 69:14 83:25 <b>engagement</b> 30:2 114:20 <b>enlarge</b> 22:7 <b>enormous</b> 1:21 70:17 <b>enquiries</b> 104:24 115:19 <b>enquiry</b> 44:14 87:1 <b>ensure</b> 69:10 <b>entire</b> 32:16 97:3 <b>entirely</b> 1:4 8:17 66:12 72:22 74:17 109:8 110:2 <b>entitled</b> 52:16,20 <b>entry</b> 14:11 27:9 28:24 <b>equally</b> 80:5 <b>equivalent</b> 19:13 20:24 <b>erasure</b> 18:5 <b>error</b> 103:11,19 <b>especially</b> 73:25	<b>essentially</b> 19:9 21:6 80:18 <b>established</b> 115:3 <b>establishing</b> 46:5 <b>estimate</b> 102:13 <b>et</b> 38:22 <b>European</b> 30:1 <b>evaluated</b> 35:9 <b>evening</b> 121:6,7 <b>event</b> 72:14 <b>events</b> 2:4,22,24 37:24 67:5 71:19,20 80:10 <b>everybody</b> 1:19 96:14 <b>everyone's</b> 84:8 <b>evidence</b> 1:16,24 3:12,18,23 4:9 11:20 26:3 27:2,3,24 29:15,18 30:8 31:11 33:25 34:12 35:1,10 36:10,20 41:16 43:3,8,12 45:4 46:19 47:9 48:14,16,17 53:22 54:3 56:15 57:14 58:6 59:1 60:24 63:24 76:10,25 78:10 79:16,22 80:1 80:3,13 85:23 86:1,2,3,13 90:23 95:16 96:4 98:12 104:19 107:4,8 110:14,21 113:7 119:17 120:19 <b>evidential</b> 65:18 <b>evidentially</b> 89:23 <b>EV21</b> 76:17 <b>exactly</b> 11:6 34:3 51:20 68:22 79:25 81:13,22 96:18 113:7 118:23 <b>examined</b> 88:9 <b>examining</b> 8:2 <b>example</b> 11:13 13:10,12,12 18:14 51:10 69:9 87:18 88:21 96:3 105:9 106:9 108:15 <b>examples</b> 101:10 <b>exception</b> 16:6 <b>exceptional</b> 13:12,24 20:13 <b>excessive</b> 57:8 <b>exchange</b> 77:23 <b>exclude</b> 28:5	36:7 <b>excluded</b> 30:7 <b>excuse</b> 16:1 <b>exempt</b> 16:9 <b>exercise</b> 12:2,15 34:15 56:13 89:13 114:18 <b>exhibit</b> 11:19 27:7 63:3 86:10 91:20,21 91:22 97:25 102:23 <b>exhibits</b> 2:14 3:1 3:22 11:17 <b>existed</b> 36:20 48:16,17 53:22 <b>expect</b> 120:1 <b>expectation</b> 33:24 117:11 <b>expected</b> 46:23 <b>expensive</b> 45:14 55:2 65:22 100:13 <b>experience</b> 117:18 118:18 <b>explain</b> 3:24 45:25 <b>explaining</b> 98:22 <b>explanation</b> 108:12 <b>explanations</b> 108:5 <b>explicit</b> 60:13 <b>explored</b> 93:12 <b>explores</b> 57:12 <b>expose</b> 97:6,7 <b>express</b> 24:4 64:7 <b>expresses</b> 60:6 <b>expressing</b> 54:11 <b>expression</b> 13:4 17:3 69:10 <b>extensive</b> 24:17 <b>extent</b> 23:4 87:23 115:17 118:24 119:5 <b>external</b> 37:25 48:11 57:11 62:11 <b>extinguished</b> 74:24 75:6 <b>extremely</b> 2:12 24:13 62:13 100:11 <b>ex-directory</b> 87:6 88:22,24 89:18,21 97:15 99:1,7 101:17 106:15,20 107:6,11,17 108:6,24 109:4 109:6	79:25 80:3 86:1,2 <b>fact</b> 31:18 38:15 39:16 40:19 47:5,6 67:5 68:5 69:23 72:12 105:16 117:20 <b>facts</b> 47:4 60:19 <b>fact-specific</b> 12:19 <b>failures</b> 47:12 <b>fair</b> 5:4 59:17 66:4 77:16 91:2 118:16,23 <b>fairly</b> 13:12 56:13 64:15 86:8 93:12 <b>fairness</b> 47:8 52:21 <b>fall</b> 16:24 18:17 <b>falling</b> 30:10 <b>falls</b> 10:3 <b>familiar</b> 83:9 110:19 116:12 <b>families</b> 94:22 <b>family</b> 56:9 69:3 69:5 86:4 88:23 89:13 96:4,6,14 99:6 <b>far</b> 8:5 24:21 45:17 50:17,20 51:16 54:16 74:4 77:23 84:24 94:16 <b>fault</b> 1:5 <b>favourable</b> 54:4 55:23 <b>fed</b> 88:8 <b>feeds</b> 13:4 <b>feel</b> 16:21 21:20 113:14 <b>feeling</b> 30:15 41:25 83:18 <b>fees</b> 21:25 22:6 <b>fell</b> 117:14 <b>felt</b> 15:2 21:22 21:23 22:3 23:3 30:4 70:15 82:8 96:22 119:8 <b>fifth</b> 3:16 104:11 <b>figure</b> 104:1 <b>figures</b> 101:19 101:20 102:10 103:10 104:3,4 104:7 105:22 112:1 <b>file</b> 2:14 3:2,7 27:9 39:14 51:24 52:2,2 82:25 83:22 84:4 113:20 <b>final</b> 20:12 34:22 77:22 <b>finally</b> 96:21 <b>financial</b> 24:6	54:5,13 55:23 <b>find</b> 13:7 19:9 96:7,8 107:18 <b>finding</b> 78:15,21 78:21 <b>findings</b> 111:21 <b>fine</b> 14:4,6 120:16 <b>fingertips</b> 119:16 <b>finished</b> 44:4 <b>firm</b> 5:13 <b>firmly</b> 97:23 <b>firms</b> 98:20 <b>first</b> 2:7,11,21 4:15 8:7 10:21 14:21 15:10,11 20:22 21:14 22:12 23:11 24:19 25:8,11 26:24 31:6 32:23 38:11,19 44:13 47:4 51:24 58:19 59:10 63:18 73:10 87:9,22 87:25 90:20 96:24 97:25 98:7 107:6 109:11 112:3 113:10 114:2 <b>fishing</b> 11:24 12:15 <b>fit</b> 1:24 20:18,25 <b>five</b> 4:16 32:23 64:21 108:18 110:17 <b>fixed</b> 101:12 <b>flouting</b> 98:15 <b>flows</b> 20:6 <b>fluctuate</b> 86:3 <b>focus</b> 35:24 38:24 40:13,18 41:22 97:4 119:1 <b>focused</b> 29:25 32:17 40:14 44:9,17 91:5 116:19 119:19 <b>focusing</b> 15:13 <b>FOI</b> 88:7 102:10 <b>follow</b> 27:5 33:25 35:10 47:9,18,25 52:12 53:23 84:18 98:12 <b>followed</b> 23:18 58:5 75:18 120:25 <b>following</b> 2:24 19:23 27:1,16 50:19 63:25 92:15 <b>follows</b> 47:20 <b>footlogging</b> 99:12 <b>foot-slogging</b> 100:12	<b>force</b> 6:3,3 <b>forced</b> 85:15 <b>form</b> 2:3 48:17 73:14 88:13 <b>formal</b> 15:1 22:20,24 30:13 113:20 <b>formally</b> 33:2 <b>formed</b> 23:9 <b>former</b> 4:2 7:1 13:16 21:17 25:5 41:4 54:10 120:9 <b>formulate</b> 48:1 <b>forward</b> 2:7 34:8 42:5 49:7 59:8 70:8 113:6 <b>found</b> 8:8 19:15 25:18 33:7 49:12 68:14 87:11,12 88:3 97:18 103:11 112:5 <b>four</b> 35:14 40:24 43:7 51:7 52:25 69:25 73:12,15 79:13 81:16 104:1 108:17 110:17 117:25 <b>fourth</b> 3:11,25 22:18 32:21 65:7 71:6 115:15 119:17 <b>frame</b> 27:14 50:9 50:12 <b>Francis</b> 22:23 28:2,8 29:20 30:6 34:23 <b>frankly</b> 33:6 54:19 61:17 <b>freedom</b> 5:24 6:1 13:4 17:3 19:14 46:7 49:16 69:10 86:14 88:4 <b>frequently</b> 15:4 19:18 99:2,5 <b>Freshfields</b> 4:21 <b>Friday</b> 1:1 <b>friend</b> 96:14 <b>friendly</b> 114:20 <b>friends</b> 56:9 69:3 69:5 86:4 88:23 89:12 94:22 96:4,7 99:6 <b>front</b> 62:24 <b>full</b> 1:11 2:8 29:24 59:19 76:8 81:25 82:3,22 83:24 85:7 99:13 100:24 <b>fully</b> 6:3 52:24 76:1 90:3 93:12 99:25	117:23 <b>full-time</b> 4:25 <b>functions</b> 5:19 5:21 6:4,8,12 19:24 20:18 41:8 46:15 75:11,14 92:14 <b>fund</b> 22:5 <b>fundamentally</b> 116:5 <b>funding</b> 21:24 <b>further</b> 3:22 10:10 17:23 37:11 38:2 47:9 65:16 75:21 79:11 80:9 81:2 82:1 82:5,12 87:8 91:3 92:10,11
					<b>G</b>	
					<b>gather</b> 44:12 <b>gathering</b> 26:15 <b>general</b> 6:15 12:18 19:21 23:15 24:21,22 26:18 29:13 31:20,22,23 32:4 41:19 50:7,8,25 53:12 65:13 66:6 77:13 78:5 86:6,8 108:13 111:24 120:1 <b>generally</b> 49:15 49:16 50:22 62:2 111:22 <b>getting</b> 24:3 26:22 69:19 78:8 96:15 97:17,18 <b>gist</b> 81:20 <b>give</b> 13:10,11 17:25 26:11 32:15 39:24 45:8 59:12 63:18 99:20 <b>given</b> 34:17 38:16 39:8,16 47:4 55:15 58:20 60:16 65:1 81:19 82:9 85:24 100:21 106:6 109:1 110:7 <b>gives</b> 102:21 <b>giving</b> 6:15 40:9 43:5 86:11 94:13 98:2 101:10 <b>glad</b> 116:4 <b>Glade</b> 41:2,8,22 42:7 68:10 73:13 81:17 <b>go</b> 2:10 8:18 14:17 16:18	

17:23 21:14 22:25 34:7 36:15,17 37:1 44:1 45:22 55:3,6,22 56:4 56:6 57:12,20 58:2 60:4 62:2 62:7,13,14 64:18 66:10,14 66:23 73:7 78:6 80:19,22 81:1 82:5 85:6 94:16 108:8 111:5,6,15 112:13 115:14 119:9 120:17 121:8 <b>God</b> 67:14 <b>goes</b> 116:4 <b>going</b> 1:14 3:9 4:10,11 8:9 12:16,21 15:21 16:22 17:23 18:13 19:10 23:21 26:13,25 27:7 28:17,22 31:3 34:19 36:11 38:2,12 40:12 41:18 42:13,24 43:19 45:14,22 46:1 46:25 47:2 48:4 51:16,25 53:10,16 54:20 55:1,6,22,24 56:5,6 57:1,10 58:15 61:9,25 62:12,14 64:11 64:18 65:2 69:16,18 75:5 75:25 77:14 78:16 79:10 80:6 81:20 82:20 88:21 90:25 95:6 96:20 97:20 98:2 100:12 104:10 105:17 106:21 108:25 111:12 112:7 114:18 116:6 118:20 119:4 119:10,10 <b>good</b> 1:7 19:23 20:4 30:15 36:10 45:12 59:1 64:21 66:1,17,25 75:15 95:1 117:3,3 <b>goodness</b> 67:8 68:24 <b>governance</b> 117:6 <b>government</b> 13:14 90:25 <b>Graham's</b> 8:8	<b>grand</b> 64:17 <b>grant</b> 22:2 <b>grateful</b> 1:25 49:5 <b>great</b> 11:3 34:19 44:22 73:24 76:4 105:2 108:20 110:22 <b>greater</b> 39:3 <b>ground</b> 16:24 <b>grounds</b> 14:12 <b>group</b> 5:15 46:22 51:11 <b>groups</b> 61:25 <b>guaranteed</b> 89:8 <b>Guardian</b> 25:16 <b>guidance</b> 11:2 <b>guilty</b> 56:15 78:15,21,21 79:3,5 84:10 84:15 94:1 95:21 106:12 <b>gun</b> 56:17 <b>gut</b> 70:13 <hr/> <b>H</b> <hr/> <b>hacking</b> 23:13,19 23:21 69:24 <b>half</b> 49:13 50:11 <b>halfway</b> 65:9 <b>hand</b> 5:21,23 15:25 47:8,15 48:21 86:5 <b>handed</b> 22:1 41:11,16 42:18 <b>handled</b> 24:12 45:18 <b>handler</b> 116:16 117:20 <b>handlers</b> 116:20 <b>hands</b> 18:8 24:3 88:18 89:1 96:5 <b>hands-on</b> 30:2 <b>handwritten</b> 120:8 <b>handy</b> 62:20 <b>happen</b> 28:19 48:9 <b>happened</b> 25:8 28:19 53:13,15 59:20,21 70:1 83:9 84:3 90:10 113:7 115:9 <b>happening</b> 46:22 <b>happily</b> 100:17 100:18 <b>happy</b> 22:3 118:11 <b>hard</b> 78:10 79:15 79:25 80:2 82:8 86:1,1 95:15 108:12 <b>Hartley</b> 104:23 <b>head</b> 5:1 73:17 <b>heading</b> 15:11	53:25 <b>headings</b> 90:14 <b>heard</b> 21:19 107:7 <b>hearing</b> 34:24 <b>hearings</b> 25:10 <b>heart</b> 7:5 38:24 116:5 <b>heavily</b> 19:14 29:20 46:9 87:21 110:18 <b>held</b> 18:1 23:24 24:4,8 109:19 118:17 <b>help</b> 8:3 11:8 29:7 45:25 77:25 <b>helpful</b> 14:1 27:10 60:1 62:5 <b>high</b> 89:3,4 99:17,24 100:2 100:3,20 101:19 <b>highlight</b> 72:10 76:7 <b>highlighting</b> 25:17 <b>highly</b> 23:14 95:3 96:8,8 97:10 98:15 109:3 <b>hindsight</b> 67:7 <b>Hinton</b> 112:18 118:3 <b>hit</b> 73:14 <b>holding</b> 25:10 117:18 <b>holepunch</b> 78:9 <b>holepunches</b> 52:9 <b>holiday</b> 58:21 <b>holy</b> 61:19 <b>home</b> 69:21 <b>honest</b> 108:23 <b>hook</b> 57:24 58:3 <b>hope</b> 55:4 66:25 109:23 <b>hoped</b> 117:15 118:24 <b>house</b> 20:17 59:13 62:22 97:15 111:7 118:21 <b>huge</b> 15:21 107:13 <b>human</b> 26:2 67:18 <b>hundreds</b> 50:13 89:15 <b>hypothesis</b> 96:19 <hr/> <b>I</b> <hr/> <b>ice</b> 61:15 <b>iceberg</b> 73:14 <b>ICO</b> 38:16,20 42:8,21 45:22	73:24 <b>ICO's</b> 2:19 74:2 83:22 <b>idea</b> 29:5 56:21 102:21 107:9 107:11 <b>identification</b> 92:23 <b>identified</b> 11:25 86:24 92:16,18 94:12 <b>identify</b> 1:14 2:9 44:16 51:19 120:19 <b>identifying</b> 26:5 <b>identity</b> 46:3 <b>illegal</b> 40:15 53:23 87:24 104:25 106:10 107:1 <b>illegality</b> 56:9 100:14 101:24 <b>illegally</b> 77:1 91:18 93:17 107:25 108:25 109:4,21 110:6 <b>illicit</b> 90:5 <b>illustrate</b> 99:21 101:12 <b>imagine</b> 69:3 <b>immigration</b> 11:4 <b>impact</b> 55:24 66:24 67:9 <b>implicated</b> 88:2 <b>implications</b> 38:1 39:20 40:6 44:25 56:5 <b>implying</b> 95:18 <b>importance</b> 17:2 <b>important</b> 1:23 1:24 12:11 19:20 29:11 37:13 58:17 63:2 70:9 75:24 76:2 97:2 116:10 <b>impression</b> 32:15 89:20 94:14 112:4 <b>impressionistic...</b> 89:14 <b>improve</b> 29:1 <b>inaccurate</b> 4:6 <b>include</b> 84:13 <b>included</b> 10:13 83:12 89:21 <b>including</b> 89:18 120:11 <b>income</b> 25:24 <b>incompatible</b> 17:10 <b>incompetence</b> 48:21 <b>inconceivable</b> 6:23	<b>inconvenience</b> 1:21 <b>incorrect</b> 79:8 <b>increases</b> 104:2 <b>increasingly</b> 36:23 68:22 75:16 <b>incredibly</b> 7:24 16:2 72:13 <b>indicate</b> 99:18 100:3,20 <b>indicated</b> 32:18 68:13 83:23 <b>indicating</b> 25:16 <b>indicative</b> 96:8 <b>indicator</b> 100:14 <b>indictment</b> 14:6 83:5,7 84:2,10 84:13 <b>individual</b> 59:25 63:16 107:19 107:19 110:24 112:9,10 114:14 <b>individually</b> 111:5 <b>individuals</b> 17:25 20:10 114:3 <b>Industry</b> 5:15 <b>inevitable</b> 42:17 <b>inference</b> 28:5 28:11 <b>inferences</b> 110:8 <b>informal</b> 30:17 <b>informally</b> 33:3 <b>information</b> 4:18 5:7,12,19,24 5:25 6:2 7:22 8:15 9:20 10:15 11:24 12:8,22 17:15 17:19 18:14 19:3,14,16 23:14,15 24:4 25:1,18 26:4 31:18,20 32:11 35:16 38:25 46:7 49:16 74:5,7 79:13 84:22 86:12,14 87:24 88:4 90:1 91:17 92:11 93:3,5 93:16 94:25 97:10 98:25 99:14,16 100:2 101:22 102:19 105:12,15 108:21 109:13 119:7,23 <b>informed</b> 45:24 115:19 <b>inhouse</b> 90:13 <b>initial</b> 38:17 39:7 75:17 <b>Inland</b> 26:2	<b>inputting</b> 103:18 <b>Inquiry</b> 2:2,7 8:2 8:4 29:18 36:2 60:1 74:18 97:5 110:21 <b>inside</b> 9:7,8 19:10 41:13,14 41:14 84:21,21 84:22 109:2 110:3 <b>insofar</b> 72:21 <b>inspection</b> 14:12 <b>installed</b> 46:14 <b>instinct</b> 70:13 <b>instructing</b> 33:18 <b>instruction</b> 38:6 55:15 <b>instructions</b> 54:8 55:8,13 <b>instructive</b> 120:18 <b>insurance</b> 98:20 117:5 <b>intelligence-dr...</b> 116:19 <b>intelligible</b> 4:10 <b>intending</b> 12:6 <b>interconnected</b> 32:6 <b>interest</b> 10:20,24 11:6,10,22,23 12:1,10,12,17 12:24 13:4,9 13:23 17:3,4 44:22 69:4,9 74:2 80:16,17 81:4 82:13 92:12 93:21,25 94:3 <b>interested</b> 33:7 116:2 <b>interesting</b> 32:18 110:12 <b>internal</b> 84:3 92:2 <b>international</b> 5:16 6:16 106:1 107:4 118:3 <b>interpreted</b> 38:5 <b>intervene</b> 117:10 <b>intervening</b> 58:6 <b>interview</b> 43:15 43:20 47:7,13 48:6,15 56:11 56:12 78:6 <b>interviewed</b> 40:20 43:2 47:5 68:14 83:4 <b>interviewing</b> 37:10 65:3 <b>interviews</b> 37:11 47:22 <b>introduced</b> 113:9	<b>introducing</b> 92:6 <b>intrusive</b> 26:15 <b>investigate</b> 36:12 36:15 37:18 40:24 57:8 77:3,6,10,22 78:4 114:6 116:2 <b>investigated</b> 22:15 33:12 34:2 44:11 67:22 77:13 86:25 <b>investigating</b> 21:11 22:17 35:22 37:9 78:5 116:21 <b>investigation</b> 33:17,19,24 48:22 92:17 114:1 <b>investigations</b> 21:17 22:10,21 24:16 37:11 50:18 63:24 114:9 119:18 <b>investigator</b> 9:25 10:2 25:1 35:14 52:7 89:1 95:10 96:10 105:17 <b>investigators</b> 24:17 35:23 36:4 39:1 45:5 47:12 50:25 54:22 62:14 65:15 66:24 78:13,20 81:16 81:19 85:19 90:11,12 91:6 92:24 93:4 105:24 106:6 <b>invite</b> 4:13 27:7 38:7 <b>invoiced</b> 31:19 <b>involve</b> 62:1 63:22 84:16 104:25 <b>involved</b> 6:24 19:12 29:20 33:20,22 34:4 36:11 53:8 60:22 66:9 72:10 83:25 87:16,21 92:19 96:9 102:5 110:18 <b>involvement</b> 60:2 <b>involving</b> 6:13 8:19 <b>in-house</b> 39:18 52:6 57:3,11 72:2 83:1 <b>irrelevant</b> 7:6 29:2 100:19 <b>isolated</b> 98:13
--	---	---	--	--	--	---

<b>issue</b> 29:11 45:11 63:20 68:11 78:23 106:18	49:9 50:9,12 50:13 52:18 53:6,17 56:11 57:13 59:1 61:2,7,9,11,25 62:13 63:16 64:12,14,18 65:3,13,18 66:10 67:9,14 67:23 68:13,14 68:25 69:8 70:22 71:3,14 72:9,18 74:6 74:11,14,21,25 75:6 76:25 77:10,13 78:6 80:22 82:15,23 83:3 85:19 88:2 91:4,16 92:7,19,25 93:2,9 94:2,6 94:13,18 98:17 102:23 105:23 110:12 114:10 114:14 115:7	<b>keeping</b> 17:15 36:24 73:7 <b>kept</b> 45:24 50:22 61:12 69:2 <b>kicks</b> 113:17 <b>King</b> 52:11 <b>knew</b> 47:15 56:2 82:16 112:6 <b>know</b> 7:4 10:16 27:3 29:6 36:25 40:13,19 40:25 44:23 47:4,24 48:16 48:24 50:18,20 55:9,14,24 60:5,13,23 66:19,20,22 67:11 82:14,17 83:7,11 85:15 96:19 97:4 100:8 101:15 105:16 106:6 109:1 115:2 118:7 119:1,4 119:25	<b>lawful</b> 99:3,8 107:21 <b>lawfully</b> 99:12 99:16 100:3 <b>laws</b> 50:4 <b>lawyer</b> 39:18 43:4,23 48:12 52:6 57:4,11 83:1 89:6 <b>lawyers</b> 51:1 62:10 90:13 <b>lay</b> 7:21 20:16 21:1 <b>lawyer</b> 72:3 <b>lead</b> 32:19 36:24 41:15 45:1 59:15 64:1 88:16 120:2 <b>Leadership</b> 5:12 <b>leading</b> 2:22 85:8 <b>leads</b> 27:2 <b>learn</b> 52:9 65:6 <b>learnt</b> 28:11 <b>leave</b> 57:20 62:15 64:13 70:25 <b>led</b> 8:22 23:7 27:4 31:15 34:1 35:10 45:4 59:6 71:18 76:5 78:15 88:1,3 96:20,24 <b>left</b> 2:19,21 33:13 <b>legal</b> 4:1,23 5:1 12:13 36:22,23 37:1 39:14 50:24 51:21 64:5 65:19 66:3,5 80:9 83:22 96:8 107:12 113:20 <b>legally</b> 76:23 105:12,15 107:9 109:9 <b>legislation</b> 8:18 15:3 16:3 20:11 75:16 <b>Les</b> 112:18 118:3 <b>lesser</b> 16:14 <b>letter</b> 57:22 61:1 61:3 62:17,23 62:25 63:6,7,9 64:15 86:18 87:9,11,12 102:9 103:9,14 113:17,22 115:10,12 116:13,23 117:16 118:15 <b>letters</b> 89:9 <b>let's</b> 18:15 36:12 36:17 56:6,8 62:21 64:13 70:25 96:3 97:6,7 104:2	109:12,12 <b>level</b> 30:1 78:9 <b>levels</b> 6:16 <b>Leveson</b> 1:3,7,22 10:6 43:22,25 44:4,7,20 45:21 49:19 53:2,5,9 55:18 55:20 59:17 63:5,10,13 64:21 70:11,20 72:20 76:16 79:18 82:14,24 84:7 94:19 95:23 96:1 101:9 104:15 104:17 112:13 112:16,21 115:10,14 116:7 117:21 118:14 120:17 121:10 <b>life</b> 50:7 <b>light</b> 39:15 41:5 59:12 69:25 84:6 96:21 <b>likewise</b> 96:13 <b>limitations</b> 76:2 <b>limited</b> 14:4 18:11 56:2 65:22 66:22 <b>line</b> 12:5,10 22:24 59:4 65:1 98:12 99:25 106:12 <b>lines</b> 32:23 51:7 67:13 79:13,18 114:7 <b>linked</b> 32:3 36:18 <b>linking</b> 94:11 <b>list</b> 96:6 106:23 106:25 109:5 110:10 <b>literary</b> 16:12 <b>little</b> 11:22 59:22 65:6 <b>live</b> 37:4 73:8 115:7 <b>Lockett</b> 22:22 46:20 51:8,12 <b>logistical</b> 54:20 65:18 <b>London</b> 25:3 68:9,13 <b>long</b> 8:9 49:22 108:12 <b>look</b> 3:4 12:4,16 15:15 21:10 35:18 36:10 38:7 51:21,25 52:8 58:9,9,15 61:10,24 63:2 67:21 69:6 70:23 79:6 86:10,17 89:22 90:13 91:11,21	94:8 97:24 100:23 109:5 109:12 118:9 <b>looked</b> 13:17 53:20 95:12 99:22 <b>looking</b> 7:25 9:12 12:25 14:2,3 16:1 25:10 26:8 36:21 52:10 71:2,16 77:14 81:3 86:4 89:20,23 97:5 102:22 105:13 106:23 118:15 <b>looks</b> 62:12 <b>loose</b> 60:12 <b>Lord</b> 1:3,7,22 8:20 10:6 43:22,25 44:4 44:7,20 45:21 49:19 53:2,5,9 55:18,20 59:17 63:5,10,13 64:21 70:11,20 72:19 76:16 79:18 82:14,24 84:7 94:19 95:23 96:1 101:9 104:15 104:17 112:13 112:16,21 115:10,14 116:7 117:21 118:14 120:17 121:10 <b>lost</b> 71:5 98:6 <b>lot</b> 7:25 20:9 31:24 32:4 34:18 60:4 61:25 80:23 97:8 99:22 117:1 <b>low</b> 99:16 100:11 101:19 <b>lower</b> 78:9,9 79:12 102:13 <b>lowness</b> 100:13 <b>lucky</b> 72:13 <b>lucrative</b> 98:15 102:21 <b>lunch</b> 113:9 121:9	<b>maintained</b> 7:1 <b>major</b> 46:3,6,10 46:14 65:18 <b>majority</b> 9:18 105:2 <b>making</b> 9:21 85:13,16 <b>management</b> 5:16 29:1 30:5 46:21 51:11 <b>managing</b> 103:14 <b>mandatory</b> 20:14 <b>manner</b> 7:8 <b>manpower</b> 57:7 <b>manuals</b> 97:12 <b>March</b> 27:5,15 27:21,22,23 28:12 30:24 31:2 43:25 44:1,4,5 45:2 45:17 48:10 76:18 <b>marked</b> 91:20 <b>market</b> 25:17 93:15 97:3,7 98:23 119:2 <b>Maskell</b> 52:11 <b>mass</b> 36:16 50:19 <b>mastery</b> 110:7 110:16,17 <b>material</b> 13:24 16:12 21:21 31:9,24 32:8 34:18 36:17 40:4,5 63:25 67:1,19 83:20 86:13,24 88:3 88:9,16,17 89:21 90:13,14 110:8 114:9 <b>materials</b> 4:2 20:9 30:23 35:8 41:3 100:25 121:8 <b>matter</b> 10:10 13:8 15:7 22:14 24:13 31:3 33:13,15 33:20 37:19 39:18 42:2 44:21,24 45:9 50:18 51:14 73:13 82:10 84:24 92:10 106:17 <b>matters</b> 25:11 26:8 29:20 30:6,9 32:13 38:19,21 40:10 41:13 42:1,7 46:1 54:13 60:2 76:11 81:19 83:13 84:3 112:10 115:18 117:18									
<b>item</b> 57:1 <b>items</b> 30:7	66:10 67:9,14 67:23 68:13,14 68:25 69:8 70:22 71:3,14 72:9,18 74:6 74:11,14,21,25 75:6 76:25 77:10,13 78:6 80:22 82:15,23 83:3 85:19 88:2 91:4,16 92:7,19,25 93:2,9 94:2,6 94:13,18 98:17 102:23 105:23 110:12 114:10 114:14 115:7	<b>knowing</b> 94:5 108:10 109:2 <b>knowingly</b> 94:23 <b>knowledge</b> 26:18 28:6 30:15 41:10 85:9 105:19 106:11 <b>known</b> 50:6 87:1 88:12 89:2 <b>knows</b> 56:16 96:14	<b>level</b> 30:1 78:9 <b>levels</b> 6:16 <b>Leveson</b> 1:3,7,22 10:6 43:22,25 44:4,7,20 45:21 49:19 53:2,5,9 55:18 55:20 59:17 63:5,10,13 64:21 70:11,20 72:20 76:16 79:18 82:14,24 84:7 94:19 95:23 96:1 101:9 104:15 104:17 112:13 112:16,21 115:10,14 116:7 117:21 118:14 120:17 121:10 <b>life</b> 50:7 <b>light</b> 39:15 41:5 59:12 69:25 84:6 96:21 <b>likewise</b> 96:13 <b>limitations</b> 76:2 <b>limited</b> 14:4 18:11 56:2 65:22 66:22 <b>line</b> 12:5,10 22:24 59:4 65:1 98:12 99:25 106:12 <b>lines</b> 32:23 51:7 67:13 79:13,18 114:7 <b>linked</b> 32:3 36:18 <b>linking</b> 94:11 <b>list</b> 96:6 106:23 106:25 109:5 110:10 <b>literary</b> 16:12 <b>little</b> 11:22 59:22 65:6 <b>live</b> 37:4 73:8 115:7 <b>Lockett</b> 22:22 46:20 51:8,12 <b>logistical</b> 54:20 65:18 <b>London</b> 25:3 68:9,13 <b>long</b> 8:9 49:22 108:12 <b>look</b> 3:4 12:4,16 15:15 21:10 35:18 36:10 38:7 51:21,25 52:8 58:9,9,15 61:10,24 63:2 67:21 69:6 70:23 79:6 86:10,17 89:22 90:13 91:11,21	94:8 97:24 100:23 109:5 109:12 118:9 <b>looked</b> 13:17 53:20 95:12 99:22 <b>looking</b> 7:25 9:12 12:25 14:2,3 16:1 25:10 26:8 36:21 52:10 71:2,16 77:14 81:3 86:4 89:20,23 97:5 102:22 105:13 106:23 118:15 <b>looks</b> 62:12 <b>loose</b> 60:12 <b>Lord</b> 1:3,7,22 8:20 10:6 43:22,25 44:4 44:7,20 45:21 49:19 53:2,5,9 55:18,20 59:17 63:5,10,13 64:21 70:11,20 72:19 76:16 79:18 82:14,24 84:7 94:19 95:23 96:1 101:9 104:15 104:17 112:13 112:16,21 115:10,14 116:7 117:21 118:14 120:17 121:10 <b>lost</b> 71:5 98:6 <b>lot</b> 7:25 20:9 31:24 32:4 34:18 60:4 61:25 80:23 97:8 99:22 117:1 <b>low</b> 99:16 100:11 101:19 <b>lower</b> 78:9,9 79:12 102:13 <b>lowness</b> 100:13 <b>lucky</b> 72:13 <b>lucrative</b> 98:15 102:21 <b>lunch</b> 113:9 121:9	<b>journalists/ne...</b> 59:9 <b>judge</b> 14:16,17 82:14,22 <b>judgment</b> 81:18 88:8,14 <b>jump</b> 27:7 <b>jumping</b> 53:19 56:16 57:18 <b>June</b> 5:6 50:11 <b>jurisdiction</b> 41:23,24 42:21 <b>justice</b> 1:3,7,22 5:9 8:23 10:6 11:4,14 43:22 43:25 44:4,7 44:20 45:21 49:19 53:2,5,9 55:18,20 59:17 63:5,10,13 64:21 70:11,20 72:19 76:16 79:18 82:14,24 84:7 94:19 95:23 96:1 104:15,17 112:13,16,21 115:10,14 116:7 117:21 118:14 120:17 121:10 <b>justifiable</b> 13:23 <b>justification</b> 11:23 <b>justified</b> 10:20 12:24 105:1 <b>justify</b> 12:17	<b>Labour</b> 13:13 <b>laid</b> 20:21 21:2 38:17 39:7 103:12 <b>Lamont</b> 8:19,20 <b>language</b> 6:9,21 7:21 16:18 31:8,22 35:5 35:20 36:3,5 59:24 74:17 89:2 90:21 91:11 102:14 105:10 <b>large</b> 21:11,20 21:22 23:4 24:2 60:3 73:14 93:2,3 <b>largely</b> 23:1 105:1 <b>large-ish</b> 60:3 <b>late</b> 83:7 84:12 87:16 <b>law</b> 4:17 5:13 14:4 15:20 41:20 43:5 50:3 69:19 76:22,24 77:2 89:9 90:19 98:14,20	<b>James</b> 1:8,12 <b>January</b> 6:3 26:1 68:4 71:22 <b>Jay</b> 1:3,4,9,10 2:6,9 10:17 34:3 44:3,5 47:3 49:21,24 53:18 54:23 56:8 60:5 64:19,25 71:1 75:9 76:17 79:21 82:18 83:3 84:8 89:19 95:18 96:12 101:14 104:16,18 108:23 113:2,6 115:13 118:13 118:20 120:19 121:8 <b>Jean</b> 22:22 46:20 51:8,12 <b>JL</b> 51:8 <b>job</b> 32:24 34:21 44:11 <b>joined</b> 5:4 <b>journalism</b> 7:24 <b>journalist</b> 9:15 9:25 12:12 13:19 18:14 33:10 37:10 43:16,19 48:5 48:7 68:12 82:19 91:15 95:8,13 96:5 96:11 105:16 106:4 <b>journalistic</b> 15:19 16:12 <b>journalistic</b> 83:20 <b>journalists</b> 3:8,9 13:2 31:16 33:17,19 34:1 35:3,19 36:12 36:16,18,25 37:4,22 38:16 39:9,12 40:12 40:19,24 42:25 43:1,9,13 44:10 45:7,15 45:22 46:25 47:5,8,22 48:12,14 49:3	<b>known</b> 50:6 87:1 88:12 89:2 <b>knows</b> 56:16 96:14	<b>J</b> <b>James</b> 1:8,12 <b>January</b> 6:3 26:1 68:4 71:22 <b>Jay</b> 1:3,4,9,10 2:6,9 10:17 34:3 44:3,5 47:3 49:21,24 53:18 54:23 56:8 60:5 64:19,25 71:1 75:9 76:17 79:21 82:18 83:3 84:8 89:19 95:18 96:12 101:14 104:16,18 108:23 113:2,6 115:13 118:13 118:20 120:19 121:8 <b>Jean</b> 22:22 46:20 51:8,12 <b>JL</b> 51:8 <b>job</b> 32:24 34:21 44:11 <b>joined</b> 5:4 <b>journalism</b> 7:24 <b>journalist</b> 9:15 9:25 12:12 13:19 18:14 33:10 37:10 43:16,19 48:5 48:7 68:12 82:19 91:15 95:8,13 96:5 96:11 105:16 106:4 <b>journalistic</b> 15:19 16:12 <b>journalistic</b> 83:20 <b>journalists</b> 3:8,9 13:2 31:16 33:17,19 34:1 35:3,19 36:12 36:16,18,25 37:4,22 38:16 39:9,12 40:12 40:19,24 42:25 43:1,9,13 44:10 45:7,15 45:22 46:25 47:5,8,22 48:12,14 49:3	<b>journalists/ne...</b> 59:9 <b>judge</b> 14:16,17 82:14,22 <b>judgment</b> 81:18 88:8,14 <b>jump</b> 27:7 <b>jumping</b> 53:19 56:16 57:18 <b>June</b> 5:6 50:11 <b>jurisdiction</b> 41:23,24 42:21 <b>justice</b> 1:3,7,22 5:9 8:23 10:6 11:4,14 43:22 43:25 44:4,7 44:20 45:21 49:19 53:2,5,9 55:18,20 59:17 63:5,10,13 64:21 70:11,20 72:19 76:16 79:18 82:14,24 84:7 94:19 95:23 96:1 104:15,17 112:13,16,21 115:10,14 116:7 117:21 118:14 120:17 121:10 <b>justifiable</b> 13:23 <b>justification</b> 11:23 <b>justified</b> 10:20 12:24 105:1 <b>justify</b> 12:17	<b>J</b> <b>James</b> 1:8,12 <b>January</b> 6:3 26:1 68:4 71:22 <b>Jay</b> 1:3,4,9,10 2:6,9 10:17 34:3 44:3,5 47:3 49:21,24 53:18 54:23 56:8 60:5 64:19,25 71:1 75:9 76:17 79:21 82:18 83:3 84:8 89:19 95:18 96:12 101:14 104:16,18 108:23 113:2,6 115:13 118:13 118:20 120:19 121:8 <b>Jean</b> 22:22 46:20 51:8,12 <b>JL</b> 51:8 <b>job</b> 32:24 34:21 44:11 <b>joined</b> 5:4 <b>journalism</b> 7:24 <b>journalist</b> 9:15 9:25 12:12 13:19 18:14 33:10 37:10 43:16,19 48:5 48:7 68:12 82:19 91:15 95:8,13 96:5 96:11 105:16 106:4 <b>journalistic</b> 15:19 16:12 <b>journalistic</b> 83:20 <b>journalists</b> 3:8,9 13:2 31:16 33:17,19 34:1 35:3,19 36:12 36:16,18,25 37:4,22 38:16 39:9,12 40:12 40:19,24 42:25 43:1,9,13 44:10 45:7,15 45:22 46:25 47:5,8,22 48:12,14 49:3	<b>journalists/ne...</b> 59:9 <b>judge</b> 14:16,17 82:14,22 <b>judgment</b> 81:18 88:8,14 <b>jump</b> 27:7 <b>jumping</b> 53:19 56:16 57:18 <b>June</b> 5:6 50:11 <b>jurisdiction</b> 41:23,24 42:21 <b>justice</b> 1:3,7,22 5:9 8:23 10:6 11:4,14 43:22 43:25 44:4,7 44:20 45:21 49:19 53:2,5,9 55:18,20 59:17 63:5,10,13 64:21 70:11,20 72:19 76:16 79:18 82:14,24 84:7 94:19 95:23 96:1 104:15,17 112:13,16,21 115:10,14 116:7 117:21 118:14 120:17 121:10 <b>justifiable</b> 13:23 <b>justification</b> 11:23 <b>justified</b> 10:20 12:24 105:1 <b>justify</b> 12:17	<b>J</b> <b>James</b> 1:8,12 <b>January</b> 6:3 26:1 68:4 71:22 <b>Jay</b> 1:3,4,9,10 2:6,9 10:17 34:3 44:3,5 47:3 49:21,24 53:18 54:23 56:8 60:5 64:19,25 71:1 75:9 76:17 79:21 82:18 83:3 84:8 89:19 95:18 96:12 101:14 104:16,18 108:23 113:2,6 115:13 118:13 118:20 120:19 121:8 <b>Jean</b> 22:22 46:20 51:8,12 <b>JL</b> 51:8 <b>job</b> 32:24 34:21 44:11 <b>joined</b> 5:4 <b>journalism</b> 7:24 <b>journalist</b> 9:15 9:25 12:12 13:19 18:14 33:10 37:10 43:16,19 48:5 48:7 68:12 82:19 91:15 95:8,13 96:5 96:11 105:16 106:4 <b>journalistic</b> 15:19 16:12 <b>journalistic</b> 83:20 <b>journalists</b> 3:8,9 13:2 31:16 33:17,19 34:1 35:3,19 36:12 36:16,18,25 37:4,22 38:16 39:9,12 40:12 40:19,24 42:25 43:1,9,13 44:10 45:7,15 45:22 46:25 47:5,8,22 48:12,14 49:3	<b>journalists/ne...</b> 59:9 <b>judge</b> 14:16,17 82:14,22 <b>judgment</b> 81:18 88:8,14 <b>jump</b> 27:7 <b>jumping</b> 53:19 56:16 57:18 <b>June</b> 5:6 50:11 <b>jurisdiction</b> 41:23,24 42:21 <b>justice</b> 1:3,7,22 5:9 8:23 10:6 11:4,14 43:22 43:25 44:4,7 44:20 45:21 49:19 53:2,5,9 55:18,20 59:17 63:5,10,13 64:21 70:11,20 72:19 76:16 79:18 82:14,24 84:7 94:19 95:23 96:1 104:15,17 112:13,16,21 115:10,14 116:7 117:21 118:14 120:17 121:10 <b>justifiable</b> 13:23 <b>justification</b> 11:23 <b>justified</b> 10:20 12:24 105:1 <b>justify</b> 12:17	<b>J</b> <b>James</b> 1:8,12 <b>January</b> 6:3 26:1 68:4 71:22 <b>Jay</b> 1:3,4,9,10 2:6,9 10:17 34:3 44:3,5 47:3 49:21,24 53:18 54:23 56:8 60:5 64:19,25 71:1 75:9 76:17 79:21 82:18 83:3 84:8 89:19 95:18 96:12 101:14 104:16,18 108:23 113:2,6 115:13 118:13 118:20 120:19 121:8 <b>Jean</b> 22:22 46:20 51:8,12 <b>JL</b> 51:8 <b>job</b> 32:24 34:21 44:11 <b>joined</b> 5:4 <b>journalism</b> 7:24 <b>journalist</b> 9:15 9:25 12:12 13:19 18:14 33:10 37:10 43:16,19 48:5 48:7 68:12 82:19 91:15 95:8,13 96:5 96:11 105:16 106:4 <b>journalistic</b> 15:19 16:12 <b>journalistic</b> 83:20 <b>journalists</b> 3:8,9 13:2 31:16 33:17,19 34:1 35:3,19 36:12 36:16,18,25 37:4,22 38:16 39:9,12 40:12 40:19,24 42:25 43:1,9,13 44:

118:2	108:1 109:2	<b>monumental</b>	103:17,20	53:14,15 57:18	<b>occasions</b> 19:12	<b>old</b> 99:12 103:24
<b>maximum</b>	<b>Metropolitan</b>	45:23	104:1 106:1	58:13 60:16	36:1 108:8	103:25 107:18
102:15	40:24 41:12	<b>morning</b> 44:12	107:4 118:3	63:7 64:10,10	<b>occupancy</b>	<b>ombudsman</b>
<b>mean</b> 11:2 16:16	52:9	44:15 93:12	<b>newspaper</b> 49:14	113:17 119:12	100:11	6:11
19:9 28:16,20	<b>Meyer</b> 57:22	115:3	50:7 102:6	<b>number</b> 13:7	<b>occupant</b> 89:24	<b>ombudsmen</b>
29:5 34:3	58:12 60:15	<b>Motorman</b> 26:25	111:1,2	68:18 83:3	<b>October</b> 2:25	117:5
35:25 36:22	61:1 62:17	27:4 46:23	<b>newspapers</b> 3:18	87:6 89:15	39:13,17 43:11	<b>once</b> 50:21
42:22 45:25	63:6 117:12	51:8,13 73:19	28:2,8,10	94:11,12 97:16	45:13,17 48:11	<b>ones</b> 19:20
47:21 54:25	118:1	73:20 78:19	31:15,19 36:12	104:13 106:16	51:4,5 52:1	101:11 102:13
56:1 63:11	<b>middle</b> 84:9	85:17 87:1	44:10,17 45:22	106:20 107:13	53:14 56:25	<b>ongoing</b> 114:1
84:20 87:5	87:16	92:17 100:25	63:17 94:14	107:17,20	70:5 88:5	<b>onwards</b> 55:1
89:6 101:10	<b>middlemen</b> 36:5	<b>move</b> 38:8 85:22	102:13 105:25	108:11,24	113:19	60:23
109:23	40:14	104:9	110:24 111:15	109:18,25	<b>offence</b> 10:9,13	<b>open</b> 64:13 73:7
<b>means</b> 11:7 67:2	<b>mid-1990s</b> 24:25	<b>moved</b> 43:25	112:22 114:10	110:4 114:3	14:13 23:12	78:1
75:7 76:8 99:3	<b>mile</b> 21:9	<b>moving</b> 17:19	114:14	<b>numbering</b> 84:4	39:5 42:13	<b>opening</b> 98:1
99:7,8,12	<b>million</b> 107:6,13	94:16 97:20	<b>newspapers/Se...</b>	92:2	77:18 80:5	114:20
100:12 105:12	107:24	113:6 115:10	44:15	<b>numbers</b> 4:16,16	91:15 93:10,11	<b>opens</b> 101:2
105:16,17	<b>mind</b> 11:25		<b>Nods</b> 73:17	76:13,16 88:22	93:14 94:5,20	<b>operandi</b> 106:7
106:10 107:9	46:18 56:21	<b>N</b>	57:3	88:25 93:2	95:4,7,9,13,22	<b>operating</b> 98:13
107:12	64:2 73:5	<b>name</b> 1:11 13:7	<b>Nolan</b> 52:5 53:16	94:22 96:14	95:24 102:18	<b>Operation</b> 26:25
<b>meant</b> 9:9,9	75:19 87:15	13:11,14 54:1	57:3	99:1,2,5,7	105:14,24	27:4 41:2,8,22
11:10 54:21	91:9 95:3,10	<b>names</b> 13:11	<b>non</b> 47:7	101:18 105:3,8	106:4,19,22	42:7 46:23
68:12 74:1	95:11 97:1	82:19 102:23	<b>non-appearance</b>	106:5,24 107:6	<b>offences</b> 43:9	68:10 73:13,18
114:19	117:8	<b>naming</b> 3:8	1:19	107:8,11,24	74:1 80:3	73:20 78:19
<b>media</b> 6:20,24	<b>mine</b> 31:8	112:8	<b>non-compliance</b>	108:6,7,16	83:17 84:13	81:17 85:17
7:10,14 15:13	<b>minister</b> 11:14	<b>narrative</b> 2:17	15:2	109:4	91:4,5 94:7,15	92:17
24:20 25:2	13:13,19	<b>narrow</b> 56:13	<b>non-existent</b>		94:18 95:5	<b>operational</b> 30:2
43:10 46:19	<b>minutes</b> 51:22	<b>national</b> 5:2 6:16	1:20		105:23 106:5	34:4 37:19
61:24 63:22	64:21	56:10 69:2,21	<b>non-notification</b>	<b>O</b>	106:24 114:6	47:11
69:7 70:16	<b>Mirror</b> 25:20,20	114:10	22:13	<b>obey</b> 15:7	<b>offenders</b> 110:10	<b>opinion</b> 58:7
76:11 90:6,24	<b>misattributed</b>	<b>natural</b> 29:10	<b>normal</b> 10:6	<b>obeys</b> 55:7	<b>offhand</b> 96:2	100:19
91:13 109:24	103:19	<b>nature</b> 12:23	45:19 47:2	<b>objective</b> 10:22	<b>office</b> 2:19,23 4:2	<b>opportunity</b>
<b>medical</b> 24:7	<b>misleading</b> 16:22	23:13 31:17	99:2,8	60:19	5:4 7:2,17 9:7	37:15 63:20
<b>meeting</b> 27:25	<b>missed</b> 113:12	32:10 79:13	<b>Norman</b> 8:19	<b>observance</b>	9:8,23 13:16	<b>option</b> 36:24
30:17,21 34:10	<b>misses</b> 110:1	87:23 90:3	<b>northwest</b> 25:3	19:25	13:17 14:11	47:23 48:1,2
34:24 46:21	<b>missing</b> 7:6	102:22 119:17	<b>note</b> 27:9,17,20	<b>obtain</b> 9:4,9,10	15:1 21:8,24	61:11 64:13
49:13 50:5	<b>mistake</b> 99:23	119:24	28:13 39:19	47:9 99:6	22:5,8 24:24	70:23 71:3
51:11,25 52:3	<b>Mm</b> 48:18 93:8	<b>necessarily</b> 7:5	46:2 50:8	108:16,21	25:5 26:19	96:22
60:15 68:4	<b>Mm-hm</b> 86:21	76:8 77:21	51:10,25 52:23	<b>obtained</b> 9:19	27:19 29:1	<b>options</b> 51:17
72:3 113:25	<b>mobile</b> 106:15,19	109:20	67:21 72:2,19	23:14 31:18	30:5,13 32:16	<b>order</b> 4:9,11
115:9,19 118:3	108:7	<b>necessary</b> 1:22	76:12 81:25	34:13 35:9	34:5 40:17,20	12:20 15:8
119:12,13	<b>model</b> 117:3	48:6 101:25	82:4,25 83:2	90:1 91:18	41:4,9 42:24	19:6 43:2 47:8
120:4,7,8,10	<b>modelled</b> 117:6	<b>need</b> 7:15 9:3	84:4 113:19	93:4,17 96:15	46:5,11 47:6	59:14 62:22
120:20 121:4	<b>models</b> 118:10	12:19 13:2	119:13,15,20	97:10 98:25	51:16 54:14	89:17 111:7
<b>meetings</b> 53:8,9	<b>modern</b> 108:20	14:16 28:9,25	119:22 120:8	99:2,8,11,16	55:3 56:19	118:22 119:12
58:13 117:25	<b>modified</b> 103:21	30:4 34:19	120:10,12,22	100:2 101:16	59:17 65:2,14	<b>organisation</b>
<b>member</b> 5:16	<b>modus</b> 106:7	58:4,25 63:9	<b>notebook</b> 27:18	105:8,10,12,15	66:20 67:9	6:21 7:14
<b>members</b> 24:16	<b>moment</b> 1:15	75:9 91:10	49:20 51:6	106:8,10 107:9	69:15,15 75:11	19:10 23:3,7
<b>memorandum</b>	38:12 44:20,22	<b>needed</b> 28:7 34:1	103:17	107:12,25,25	82:25 87:10,22	23:10 60:3,4
115:17	47:25 48:19	34:7 56:8	<b>notebooks</b> 49:11	108:25 109:4	120:9	61:20 80:19
<b>memories</b> 34:10	64:20 114:5	<b>neither</b> 37:14	<b>notepaper</b> 113:3	109:18,20	<b>officer</b> 5:1 22:22	<b>organisations</b>
<b>memory</b> 37:16	<b>moments</b> 53:18	<b>networks</b> 24:17	113:4	110:6	37:9	6:14 7:10
45:12 62:6	<b>Monday</b> 27:16	26:20	<b>notes</b> 49:13	<b>obtaining</b> 10:8	<b>officers</b> 21:18	15:13 18:10
81:12	84:6 103:2	<b>never</b> 20:25,25	83:22 113:18	10:19 12:7,22	48:22 68:11	24:20 46:12
<b>men</b> 84:10	<b>money</b> 22:1,5	36:14 40:20	120:7	18:14 77:18	<b>offices</b> 46:5	64:4 90:7
<b>mens</b> 105:14	46:12 62:1	43:4 47:5	<b>notice</b> 14:23 15:5	101:16,21	65:22	91:13 102:6
<b>mentally</b> 48:19	84:21 102:5	54:15 72:18	19:3	106:19	<b>official</b> 52:13	108:14
<b>mentioned</b> 53:1	109:8	80:6	<b>noticed</b> 62:19	<b>obtains</b> 8:14	120:10	<b>organised</b> 38:24
82:19	<b>monkeys</b> 68:16	<b>nevertheless</b>	<b>notices</b> 108:13	<b>obvious</b> 1:25	<b>officials</b> 35:15	<b>organising</b> 40:14
<b>merely</b> 11:24	70:14	75:3 107:7	<b>noticing</b> 29:8	18:12	65:15	<b>original</b> 27:10
18:15 55:12	<b>month</b> 5:10	108:19 115:5	<b>notified</b> 22:1	<b>obviously</b> 1:23	<b>off-piste</b> 85:12	49:24 50:1
<b>message</b> 18:7	50:21 82:16	<b>new</b> 28:22,25	<b>notify</b> 6:25 22:14	23:18 27:16	<b>Oh</b> 28:21 29:12	84:1
31:23 32:4	103:11	46:8 50:4 72:2	22:15	32:7 60:22	54:25 71:7	<b>originally</b> 84:11
34:18 36:10	<b>months</b> 23:18,22	72:10 90:11	<b>Noting</b> 121:8	<b>occasion</b> 33:10	112:15	<b>origins</b> 8:18
50:11	25:9 34:6 70:1	103:23	<b>November</b> 3:6	59:11 68:3	<b>Okay</b> 19:2 39:23	<b>ought</b> 12:6 67:23
<b>met</b> 112:18,24	74:23 93:7	<b>Newell</b> 50:6	3:11,16 5:6	<b>occasionally</b>	57:17 85:15	119:4
<b>methods</b> 26:15	110:20	<b>News</b> 25:19	37:24 45:2,14	98:14	115:4	<b>outcome</b> 64:5

73:6 74:22 76:6 79:10 <b>outraged</b> 96:20 <b>outrageous</b> 96:7 <b>outset</b> 55:5 <b>outside</b> 14:19 18:25 26:4 42:8,10 68:8 84:17 90:17 97:14 98:14 <b>overspeaking</b> 98:24 121:6 <b>overstate</b> 74:16 <b>overstated</b> 89:5 89:6 <b>overstatement</b> 90:7,22 <b>overstating</b> 74:9 75:1 115:2 <b>overview</b> 8:5 <b>overwhelming</b> 112:4 <b>Owens</b> 3:12,23 22:21 27:24 30:10,13,14,18 30:21 31:3,14 32:24 33:3 36:9 38:3 44:11 52:6 53:20 101:24 <b>owing</b> 15:22 23:13 <b>owner</b> 97:14 <b>ownership</b> 101:17 <b>o'clock</b> 121:6,10	<b>paperwork</b> 42:3 50:19 66:11 85:14 <b>paragraph</b> 3:11 5:18 21:14 22:19 23:11 24:14 25:14 32:22 34:9,22 35:6 37:5 38:9 38:11 52:8 58:24 63:11 65:9 66:2,14 67:24 68:5,6 68:20 70:11 71:1,10,12 72:6 73:11 93:19 97:24 98:7 100:23 101:2 102:7,12 104:12,15,16 104:22 109:11 109:16 113:9 113:12,13 115:15 118:11 <b>paragraphs</b> 4:14 26:9,24 65:8 92:9 <b>paraphrase</b> 24:18 113:23 <b>parked</b> 97:14 <b>Parliament</b> 10:11 20:17,21 21:1 69:18 70:4 90:25 92:13 103:12 103:13 <b>part</b> 7:24 8:18,25 15:10 21:4,7 23:9 30:8 38:21 41:7 68:4,5 84:16 94:5 <b>participants</b> 82:21 <b>particular</b> 7:16 9:23 10:12,19 13:1,18 17:2 19:24 20:6 21:3 45:11 48:5 60:7,9 61:21 62:8,10 63:3 67:24 70:6,10 77:8 77:11 80:7 94:9 95:25 <b>particularising</b> 93:24 <b>particularly</b> 7:19 8:1 48:15 107:23 <b>parties</b> 85:18 <b>partly</b> 6:10,10,11 6:11 <b>parts</b> 18:6 <b>part-time</b> 5:8 <b>passed</b> 6:2 108:11	<b>Paul</b> 112:19,24 <b>pause</b> 2:9 77:9 <b>Pausing</b> 99:4 <b>pay</b> 109:8 <b>paying</b> 84:21 100:10 109:5 109:13 <b>payments</b> 102:5 <b>PCC</b> 58:10,13 62:2 64:14 104:10 111:15 113:8,24 116:14 117:22 119:23 120:1 <b>PCC's</b> 64:8 <b>penultimate</b> 63:11 99:24 <b>people</b> 9:19 11:5 11:12 12:20 21:8,11 26:21 35:23 37:17 46:11 53:1 60:8 61:24 77:1 84:21 97:8 106:15 108:22 109:24 112:5,6,18 <b>perception</b> 117:17,21,24 <b>perfectly</b> 79:4 <b>perform</b> 19:24 <b>period</b> 45:17 48:9 <b>periodicals</b> 114:11 <b>permafrost</b> 61:15 <b>permit</b> 118:21 <b>person</b> 6:24 7:6 8:14,14,15,16 16:11 33:6 37:18 76:23,24 85:9 94:24 <b>personal</b> 7:8,13 9:4 10:1 15:18 16:8 18:3 23:23 24:2,11 27:18 41:10 60:2 87:24 97:10 99:11,13 99:17 105:10 108:21 <b>personally</b> 19:12 45:8 60:5 <b>pertinently</b> 2:19 <b>perverse</b> 76:5 <b>Phil</b> 72:3 83:1 <b>Philip</b> 87:12 <b>phone</b> 23:13,19 23:21 97:16 101:18 106:15 106:20,21 107:6,11 108:7 108:10,16 109:18,25 110:4 <b>phrase</b> 32:1,8	61:18 66:20 <b>pick</b> 56:8 <b>picture</b> 50:22 83:24 110:21 114:25 <b>piece</b> 58:6 <b>pieces</b> 75:22 99:14 <b>place</b> 23:6 27:4 28:12 42:4 48:10,12 120:4 <b>plain</b> 16:17 <b>plausible</b> 107:23 <b>played</b> 30:8 <b>players</b> 31:25 32:5 <b>plea</b> 79:4 <b>pleaded</b> 79:3,5 84:10,15 94:1 106:12 <b>pleas</b> 56:16 <b>please</b> 1:10,11 8:7 10:17 32:21 38:7 48:3 49:6 52:9 86:10,20 87:15 94:20 115:13 115:14 <b>pleased</b> 112:22 <b>plenty</b> 59:1 <b>plough</b> 107:17 <b>plural</b> 68:13 <b>pm</b> 121:11 <b>PNC</b> 86:4 89:12 98:25 99:5 100:22 <b>point</b> 9:2,6,21,24 10:16,17 11:22 12:18 23:18 39:7 41:11 42:12 43:6,10 50:14 52:16,18 52:20 54:25 55:1 59:3 60:10,23,25 62:8,10 67:11 69:14 70:24 75:3,4 76:2 81:18 82:11 85:17 91:3 97:2,22 99:21 105:21 106:14 109:10,15 110:2 119:18 <b>points</b> 4:7 7:17 10:21 69:6 98:9 119:15,25 <b>police</b> 21:17 25:19 38:22 40:24 41:7,12 41:14,17,18,21 42:18 52:10,17 56:10 67:22 69:2 84:17,22 114:5 <b>policy</b> 3:9 5:5,12 6:11,15 29:25	37:20,23 38:5 47:10,14 48:20 54:13,17,18,24 55:5,8 57:14 59:5,15 60:10 60:12,16,19,20 60:24 61:8,18 61:20 64:17 73:19 74:9,12 74:19 96:7 <b>politically</b> 62:2 <b>Pollit</b> 52:6 <b>position</b> 3:7 16:22 47:3 49:25 72:8 73:12 74:9 <b>positive</b> 50:15 92:23 102:14 <b>positively</b> 87:1 88:11 89:2 92:18 94:12 <b>possibility</b> 61:2,6 61:11 65:12 71:13 72:21,22 73:2,8,8 74:20 74:25 75:3,5 107:20 115:6 <b>possible</b> 8:13 28:16 38:3 53:17 65:4 85:23 93:20 94:2 <b>possibly</b> 27:22 30:18 73:3 74:8 78:2 99:4 107:11 <b>post-prandial</b> 113:6 <b>potent</b> 89:23 <b>potentially</b> 29:11 <b>power</b> 14:9,22 15:1,4,8 19:11 19:13,13 20:12 20:13,22,23,24 21:5 43:20 <b>powerful</b> 61:24 <b>powers</b> 6:19,20 7:17,22 8:5 14:11,18,19,21 15:10,12,17 19:2 41:19 <b>practical</b> 73:5 <b>practice</b> 19:23 20:4 46:9 72:11 75:15 120:3 <b>practices</b> 26:17 63:21 67:1 <b>practised</b> 43:5 <b>precisely</b> 2:10 62:9 77:8 <b>predates</b> 27:20 <b>predecessors</b> 20:25 <b>prejudicing</b> 71:23 <b>preparation</b>	87:21 <b>preparations</b> 46:6 <b>prepare</b> 119:13 <b>prepared</b> 3:2,25 4:3 64:13 82:25 119:20 <b>present</b> 2:18 <b>presented</b> 34:11 <b>press</b> 6:18 7:18 8:21 25:3,4,6 25:15,23 38:2 40:8 45:16 46:10 54:2,21 55:6,22 56:4 57:6,23 58:2,3 59:12 62:8,21 63:18 67:2 69:16,21,24 70:6 72:11 75:17 80:12 97:1,5,6 111:1 114:21 115:22 115:24 116:11 117:8,19 118:8 119:4 <b>presumably</b> 7:13 29:14 53:2 70:14 89:17 121:4 <b>pretty</b> 18:12 22:9 27:22 31:1 33:21 <b>prevalent</b> 108:17 108:18 <b>prevent</b> 18:2 75:8,15 117:10 <b>preventing</b> 37:9 <b>prevention</b> 75:20 116:20 <b>previous</b> 4:6 25:15 27:22 28:16 117:1 <b>previously</b> 4:8 50:6 <b>pre-dates</b> 69:24 <b>price</b> 25:14 26:10 67:20 96:24 99:15 100:2,12,13 101:3,4,12,15 101:16 109:5,6 111:17 <b>prices</b> 99:14,20 101:12 102:3 102:19 <b>prima</b> 12:15 79:15,25 80:3 86:1,2 <b>primarily</b> 2:22 9:11,13,17 20:6 29:24 75:13 91:5 106:5 108:20 <b>principle</b> 15:12 15:15 17:17,20 <b>principles</b> 10:6	14:25 15:14 17:13,17 19:7 <b>print</b> 108:9,15 <b>printed</b> 104:14 <b>prior</b> 63:19 <b>priority</b> 72:5 <b>privacy</b> 5:17,22 25:15 26:10 67:20 96:25 111:17 <b>private</b> 9:25 10:2 23:25 24:10,17 25:1,17,22,22 35:14,23 39:1 81:19 84:20 85:19 91:6 92:24 94:21 95:10 105:17 <b>proactive</b> 116:19 <b>probable</b> 90:4,17 102:14 <b>probably</b> 2:18 10:7 16:7 18:12 30:11 45:4 50:10,13 50:21 67:12 68:12 79:21 82:20 88:5 98:11 99:24 100:18 103:6 118:1 119:20 120:15 <b>problem</b> 46:10 59:11 70:10 <b>problems</b> 68:25 119:8 <b>proceed</b> 74:2 80:8,15,24 83:15 <b>proceeding</b> 50:23 <b>proceedings</b> 64:6 72:9 <b>process</b> 21:13 43:14,18 53:11 <b>processed</b> 7:9,23 15:19 16:8 <b>processing</b> 16:10 16:13,14 18:3 18:4,10,22,24 <b>procures</b> 8:15 <b>procuring</b> 9:13 10:9,13,20 39:5 77:19 80:6 <b>producing</b> 2:2 <b>Professionals</b> 5:17 <b>programme</b> 46:7 <b>promise</b> 58:15 <b>promote</b> 19:22 19:25 75:15 <b>promotion</b> 20:4 <b>pronoun</b> 78:12 <b>proof</b> 101:24 <b>properly</b> 24:12 <b>proposal</b> 33:9
--	---	---	---	---	--	--

<b>proposition</b> 12:3 74:4	71:19	<b>pursued</b> 47:2	99:14	<b>receiving</b> 46:12	<b>regularly</b> 56:2	91:11,24
<b>propositions</b> 72:23 77:21	<b>provenance</b> 99:15	<b>pursuing</b> 71:3 75:7 81:18	<b>raised</b> 69:5,14 71:22 94:3 116:4,7	<b>recipients</b> 103:13	<b>regulation</b> 6:13 116:12	111:23
<b>proprietor</b> 112:22	<b>provide</b> 11:2 64:5	<b>put</b> 2:7 23:6 31:3 32:2,13 36:14 48:23,24 49:7 56:21 59:13 61:15 62:22 63:21 67:1 73:9 82:20 88:19 95:18 100:15 103:20 107:4 110:16 111:7,14	<b>range</b> 6:12 24:1 32:14 101:12 102:17,18	<b>reckless</b> 94:5 106:12	<b>regulator</b> 6:10 6:18 115:21,25 115:25 116:1,2 116:15,24 117:17,19 118:17,18	<b>represent</b> 89:25
<b>proprietors</b> 42:25 112:19	<b>provided</b> 1:13 49:4	<b>providers</b> 90:2	<b>rarely</b> 16:3 19:11	<b>recklessly</b> 94:24	<b>regulatory</b> 14:21 15:9 23:8	<b>representing</b> 90:6
<b>proprietor's</b> 111:2	<b>provision</b> 8:13 14:10 15:25 16:9 17:9	<b>putting</b> 16:17 63:12 51:3 70:8 89:3,4 114:24	<b>rational</b> 37:14	<b>recklessness</b> 105:19 106:11	<b>regulators</b> 116:18,18	<b>reprimand</b> 30:13
<b>prosecute</b> 39:12 43:19 48:5 53:17 57:9 61:9 66:19 67:8 80:22 110:14	<b>provisional</b> 63:17	<b>puzzled</b> 44:8	<b>rea</b> 105:14	<b>recognise</b> 100:6	<b>regulatory</b> 14:21 15:9 23:8	<b>reprinted</b> 104:6
<b>prosecuted</b> 68:24 69:8 72:13 85:1 95:14	<b>provisions</b> 17:25 19:19		<b>reached</b> 29:24 62:10 73:11 84:5 116:22	<b>recognition</b> 34:11	<b>reiterating</b> 54:8	<b>reputational</b> 45:23
<b>prosecuting</b> 35:22 36:25 38:16 39:9 45:3,5,6 46:25 52:10,18 61:2 61:7,11 65:12 66:9 70:16 71:14 74:11,21 74:25 75:13 114:3 115:7	<b>public</b> 5:2,5 6:15 7:1 10:20,24 11:6,9,21,23 12:1,9,12,17 12:24 13:4,9 13:23 17:3,4 23:24 24:10 52:13 65:15 69:4,9 74:2 80:16,17 81:4 82:13 92:12 93:21,25 94:3 96:23 106:16 108:13	<b>qualified</b> 4:20,21 <b>quality</b> 80:14 85:23 119:17	<b>reaction</b> 119:10	<b>recollection</b> 28:18 29:5 33:16 35:4 37:8 53:12 58:22	<b>relate</b> 38:20	<b>request</b> 21:6,12 31:17 86:15 88:4
<b>prosecuted</b> 68:24 69:8 72:13 85:1 95:14	<b>public</b> 5:2,5 6:15 7:1 10:20,24 11:6,9,21,23 12:1,9,12,17 12:24 13:4,9 13:23 17:3,4 23:24 24:10 52:13 65:15 69:4,9 74:2 80:16,17 81:4 82:13 92:12 93:21,25 94:3 96:23 106:16 108:13	<b>quantities</b> 102:5	<b>read</b> 29:14 54:6 54:10,15 55:21 56:22 57:5 58:24,25 63:11 63:14 67:23 68:1,6 77:11 82:3 91:9,13 99:24 100:1,15 104:1 106:1 114:12	<b>recommendati...</b> 64:3	<b>related</b> 42:10	<b>required</b> 6:8
<b>prosecution</b> 35:13 39:4 41:17 42:19,22 43:16 47:7,23 48:7,12 49:8 53:5,10 54:2,3 54:4 57:6 59:8 65:4 68:10 70:9,22 74:23 76:7 80:5,15 84:25 85:3 87:17	<b>publication</b> 2:23 16:11,14 17:3 17:5,12 18:22 92:18	<b>quarrelling</b> 107:10	<b>reading</b> 35:20 43:7 61:17	<b>recommended</b> 33:3	<b>relates</b> 16:10 92:23	<b>requirements</b> 15:3 16:23 17:11,13 18:8 19:25 20:11
<b>prosecutions</b> 9:18 32:20 35:10 42:7,24 43:12 51:18 61:4 73:13 74:3,6,13 76:3 80:21,25 82:12 85:17 94:2 95:15 119:6	<b>publicly</b> 46:23 51:8,13	<b>question</b> 7:16 18:12 29:13 32:11 37:3,4 44:1,7 47:17 61:23 65:2 66:16 71:22 76:16,17,21 77:7,8,20 80:11 82:23 91:7 95:1 104:10 110:23 111:14,21 115:11,23	<b>reads</b> 70:12 72:6 100:1	<b>record</b> 12:12 13:17 37:15 70:9 88:24	<b>relation</b> 7:18 18:4 41:20 53:22 78:23 81:16 84:2 86:13 103:3 106:19	<b>resigned</b> 13:13 13:20
<b>prosecutor</b> 83:19	<b>publications</b> 92:15 94:11	<b>questioned</b> 82:6 111:24	<b>real</b> 18:20 75:2	<b>recorded</b> 26:9 51:13 86:23 101:3	<b>relating</b> 114:6	<b>resisted</b> 65:21
<b>prospect</b> 18:20 57:12	<b>publicity</b> 46:23 51:8,13	<b>questioning</b> 82:3	<b>realistic</b> 55:25 57:12	<b>records</b> 24:7,7,8 24:9,9 46:20 64:15 67:22 96:13 97:17,18 99:18 101:18 101:18	<b>relation</b> 7:18 18:4 41:20 53:22 78:23 81:16 84:2 86:13 103:3 106:19	<b>resolution</b> 6:14 21:7
<b>protection</b> 5:23 6:22 7:4 8:24 10:25 14:25 15:14 17:13 18:9 19:7 22:8 29:25 41:21 42:20 46:8 49:15 63:16 75:16 78:23 81:18 83:13,17 84:12,14,16,17 92:14	<b>publicly</b> 103:1	<b>questions</b> 1:9 88:18,25 98:2 99:15 110:11	<b>really</b> 5:20 7:19 8:17 10:8,21 32:23 40:8,10 44:9 56:4 58:1 60:10 75:9 78:7 97:8 114:16,18 116:10 119:1	<b>recording</b> 50:8 85:14	<b>relatively</b> 89:16	<b>resource</b> 38:1 39:20 76:4
<b>proved</b> 69:20	<b>published</b> 11:11 11:15,16,21 18:17,21 20:9 20:20 40:17 97:12,12 103:11 107:19 110:18 111:18 111:20,24	<b>quickly</b> 49:6	<b>reason</b> 21:1 29:9 41:15 83:8 90:4 114:22	<b>records</b> 24:7,7,8 24:9,9 46:20 64:15 67:22 96:13 97:17,18 99:18 101:18 101:18	<b>release</b> 25:3,4	<b>resources</b> 22:7 26:2 55:9,25 56:2 65:23 66:22
	<b>pure</b> 12:15	<b>quite</b> 4:11 7:19 17:11 20:12 26:25 45:6 47:17 52:16 73:19 74:13 75:4 84:12 85:24 89:3,4 94:2 95:17 96:7 100:18,19 101:19,19 103:7 111:8 119:7 120:18	<b>reasonable</b> 14:12 17:8 81:17	<b>referred</b> 20:5 60:20 72:20	<b>relevant</b> 8:1 39:2 85:18 102:3 106:21	<b>respect</b> 20:17 59:8 72:14
	<b>purporting</b> 46:11	<b>quoted</b> 111:13	<b>reasons</b> 11:14 15:19 30:3	<b>refer</b> 49:5 57:1 71:12 103:2 113:25 114:1	<b>rely</b> 12:6 48:13	<b>respective</b> 64:4
	<b>purpose</b> 12:23 16:15 65:3 118:20		<b>Rebekah</b> 111:10	<b>referring</b> 81:14 87:4,5	<b>relying</b> 115:23	<b>respects</b> 76:6
	<b>purposes</b> 7:7,23 16:9 17:10 18:10,15 19:17 21:21 22:8 29:2 90:22 105:19 116:25		<b>recall</b> 9:6,17 11:10 30:21 31:25 32:24 33:2,9 34:23 34:24 35:1,6 35:25 36:14 43:5 45:10 61:5 62:9 65:11 67:12 113:4 118:7	<b>refers</b> 25:15 108:6	<b>remain</b> 105:9	<b>respond</b> 21:6
	<b>pursue</b> 37:21 45:15 47:10 61:24 64:12 82:12		<b>reasonable</b> 17:1 17:8 81:17	<b>reducing</b> 67:6	<b>remaining</b> 71:13	<b>responding</b> 2:1 58:3
			<b>referred</b> 20:5 60:20 72:20	<b>refer</b> 49:5 57:1 71:12 103:2 113:25 114:1	<b>remains</b> 84:23	<b>responsibility</b> 21:16 42:23 59:19,22 60:9
			<b>reasons</b> 11:14 15:19 30:3	<b>reference</b> 4:15 62:19 105:1	<b>remembered</b> 33:21	<b>restriction</b> 35:18
			<b>Rebekah</b> 111:10	<b>referring</b> 81:14 87:4,5	<b>reminded</b> 83:8	<b>result</b> 42:6 66:25 89:8 103:9
			<b>recall</b> 9:6,17 11:10 30:21 31:25 32:24 33:2,9 34:23 34:24 35:1,6 35:25 36:14 43:5 45:10 61:5 62:9 65:11 67:12 113:4 118:7	<b>refers</b> 25:15 108:6	<b>reminding</b> 102:1	<b>resulted</b> 76:4 90:19
			<b>received</b> 4:2,3 21:25 22:6 25:6 37:25 41:3 81:7 88:4	<b>reflect</b> 104:24	<b>removed</b> 103:1	<b>resultless</b> 119:18
			<b>receives</b> 10:1	<b>reflected</b> 38:18 116:23	<b>reorganise</b> 46:4	<b>retailer</b> 24:8
				<b>reflecting</b> 18:7 55:12 101:20 113:3	<b>repeating</b> 37:7	<b>retirement</b> 29:23 29:24
				<b>refute</b> 33:5 37:14	<b>reply</b> 88:7	<b>returns</b> 26:4
				<b>regard</b> 17:2 54:2 66:22	<b>report</b> 24:19 25:14,16,21 26:1,10 38:12 73:10 87:22 88:1 90:23 91:14,16,19 92:13 96:24 97:4,25 98:4,7 98:8,23 104:6 109:11 110:19 111:13,17,25 112:25	<b>revealed</b> 23:21 63:24
				<b>regarded</b> 117:2	<b>reported</b> 22:22 22:22,23	<b>Revenue's</b> 26:2
				<b>regards</b> 42:20	<b>reporting</b> 46:22	<b>reverse</b> 109:16 110:4
				<b>register</b> 7:1 28:25 99:13	<b>reports</b> 2:23 20:17,19,21 21:1,2 25:12 25:15 40:16,18 69:19 80:2,2 87:22 88:9	<b>review</b> 63:25 revised 104:3,4
				<b>registration</b> 101:17 109:19		<b>revision</b> 64:1
				<b>regretfully</b> 108:19		<b>Richard</b> 1:6,8,12 59:25
						<b>right</b> 2:11,15 6:19 8:16 9:2



11:20 14:7,23 15:21 18:1,2 19:1,3 20:9,19 23:15 24:9 27:16,24 28:2 30:17 32:25 34:3,20 35:11 36:11,21 37:1 37:2,13 42:11 44:21,23 45:2 45:24 46:17 49:1 51:4 52:5 61:5,10 62:24 65:5 66:7 67:17 69:17,19 70:11 74:13 75:18 77:16 79:20 87:19 98:18 99:8 100:7 101:1 109:22,23 111:10 112:25 120:22 121:5 <b>rights</b> 18:4,5 21:10 67:18 <b>right-hand</b> 76:15 <b>rigorously</b> 50:15 <b>RIPA</b> 6:19,20 <b>risibly</b> 69:5 <b>risk</b> 28:24,25 29:1 97:10 <b>risks</b> 24:2 45:23 <b>risky</b> 55:2 62:1 <b>RJT</b> 73:11 98:1 <b>RJT29</b> 103:3 <b>RJT3</b> 63:3 113:22 <b>RJT47</b> 3:1 86:10 <b>RJT49</b> 41:1 82:18 <b>RJT5</b> 119:14 <b>RJT51</b> 3:22 27:8 27:11 28:1 <b>RJT52</b> 49:6 <b>RJT53</b> 51:2 <b>RJT54</b> 120:5,7 120:23 <b>RJT6</b> 121:1 <b>role</b> 5:19 20:3,5 115:17,21 117:16,22 <b>roles</b> 4:20 <b>routinely</b> 25:22 <b>row</b> 46:14 <b>Roy</b> 52:6 <b>RT</b> 70:13 72:7 82:8 <b>ruled</b> 49:9 <b>ruling</b> 9:22 13:9 <b>running</b> 97:22	<b>satisfactory</b> 64:5 <b>satisfied</b> 14:23 <b>satisfy</b> 17:12 <b>Saturday</b> 27:4 <b>save</b> 119:15 <b>saw</b> 13:25 61:6 82:16 112:4 113:20 116:14 <b>saying</b> 9:16 10:4 10:8 11:6,20 13:22 20:19 21:9 29:19 33:13 35:2,21 36:7,15 39:6 39:21 44:12 45:1,8 46:16 55:22 56:1,4 58:1,25 64:12 67:13 68:22 70:2,3,18,21 77:12 89:7 90:18 91:12,14 91:16,19 92:22 93:9,15,15,19 94:6,18 95:2,6 95:12 100:10 102:17 105:24 106:2,3 107:5 109:11,24 118:7 120:22 <b>says</b> 43:8 48:13 59:4 61:1,3 62:25 70:20 82:7 107:8,8 <b>scale</b> 32:7 54:24 57:6 59:11 119:24 <b>scandal</b> 8:19 <b>scene</b> 51:1 90:12 <b>schedule</b> 14:11 <b>schemes</b> 116:17 117:5 <b>scope</b> 16:6 <b>screen</b> 49:17 82:20 101:7 102:12 <b>screens</b> 51:6 <b>screen's</b> 49:18 <b>search</b> 27:3 <b>searches</b> 86:5 87:6 89:25 <b>second</b> 2:25 3:25 25:21 38:7,13 42:4 47:6 50:11 63:9 72:4 86:15,17 86:22 87:25 91:19,24 98:8 102:4,7 106:14 111:17 114:7 <b>Secondly</b> 10:24 <b>seconds</b> 50:24 <b>secret</b> 30:12 <b>secretary</b> 27:19 <b>section</b> 7:3,20 8:3,7,11,17 9:3 9:13,14 10:3	10:14,17,18 14:3,3,21 15:16,22 16:1 16:7,18,19 17:23 18:18,25 19:2,20 20:7 20:13,13,14,20 21:5,13,16 22:17 23:12 24:18 28:3,8 39:4 42:13,20 43:1 45:20 49:17 50:3,3 62:3 74:1 78:24 79:5 84:25 93:5 94:21 96:10 105:10,14,20 114:1 119:7 <b>sector</b> 23:24,25 24:10 <b>secure</b> 17:15,16 17:19 <b>security</b> 17:15 23:23 24:7 <b>see</b> 8:5,10 15:24 16:6,23 18:1 27:2 28:1 36:17,22 48:13 48:19 49:14,22 52:14 53:18,21 54:8 55:14 56:5,6 58:17 58:19,20 62:21 64:19 65:14 69:7 72:19 73:19 79:10,17 79:25 81:24 82:4,4 93:20 98:4 102:25 110:21 111:16 111:25 113:7 114:19 117:12 118:16 119:10 <b>seeing</b> 58:22 66:2 71:17,18 <b>seek</b> 9:10 13:2 43:15 <b>seeking</b> 46:4 <b>seen</b> 3:13 8:11 11:20 20:25 25:3 35:13 39:14 42:3 52:23 60:6 67:19 82:22 113:18 <b>sees</b> 20:18 <b>seized</b> 30:24 31:10 92:16 102:20 <b>select</b> 25:10 26:7 26:14 64:3 76:10,18 81:13 85:25 86:7 101:11 111:11 <b>selective</b> 66:21 <b>self-contained</b>	8:17,25 23:1,4 <b>self-evident</b> 9:11 <b>self-governing</b> 23:5 <b>self-regulation</b> 116:11 117:3 118:10 <b>self-regulatory</b> 116:9 117:5 <b>semi</b> 23:2 <b>senior</b> 22:21 46:21 51:11 <b>sense</b> 2:21 5:21 9:20 17:16 32:7,9 77:14 78:5 79:24 100:8 102:9 109:12 111:6 117:22 118:19 <b>sensibly</b> 109:14 <b>sensitivity</b> 24:1 <b>sent</b> 62:17 102:10 <b>sentence</b> 34:22 35:12 38:11,13 39:10 42:17 99:22,25 100:5 100:8,16,17 115:1 117:16 <b>sentences</b> 81:20 <b>separate</b> 41:18 51:24 52:2 <b>September</b> 2:8 2:13 25:16 46:21 88:5 <b>serious</b> 23:13 32:12,12,14 38:21 40:11 41:13 42:2 43:6 44:24 45:9 84:24 114:6 <b>seriously</b> 24:13 70:16 72:19 111:21 <b>seriousness</b> 32:9 73:25 <b>serve</b> 14:22 15:4 19:3 <b>service</b> 41:14,17 42:19 84:25 90:1 <b>services</b> 92:21 93:1 <b>set</b> 11:17 14:2 25:13 37:6 38:19 40:2 54:1 55:8 100:24 119:12 <b>sets</b> 2:17 10:18 <b>setting</b> 11:9 65:24 102:2 115:17 <b>seventh</b> 17:14,15 17:17,20 <b>severe</b> 80:25 <b>severely</b> 7:19	<b>share</b> 119:6,23 <b>shared</b> 11:12,13 101:11 <b>sharing</b> 60:1 <b>shed</b> 41:5 <b>sheer</b> 34:12 54:20,24 <b>shopping</b> 24:7 <b>short</b> 38:12 64:23 117:15 121:12 <b>shortly</b> 58:20 81:11 85:24 121:4 <b>show</b> 26:3 27:11 30:8 32:3,5 37:2 90:24 <b>showed</b> 118:18 <b>shows</b> 39:15 62:19 67:24 92:15 <b>side</b> 75:14 76:15 <b>signed</b> 1:15 <b>significant</b> 91:17 111:8 114:11 <b>silent</b> 33:14 <b>similar</b> 88:15 93:21 <b>simplify</b> 46:7 <b>simply</b> 9:16 27:17 29:5,8 30:25 31:13 33:13,19 36:16 39:21 92:25 114:24 <b>sinequa</b> 47:7 <b>single</b> 77:11 90:18 95:7 <b>sir</b> 2:5 8:7 10:11 44:23 46:2,16 53:13 55:21 58:12 60:15 61:1 62:17 63:6,6,11 70:8 70:18,21 82:16 95:1 114:17 117:12 118:1 <b>situation</b> 10:14 11:7 13:6,18 22:3 46:24 60:22 64:15 67:25 88:23 <b>six</b> 1:13 2:6 <b>sixth</b> 3:21 4:3,7 27:8 49:7 <b>size</b> 45:23 <b>skipped</b> 21:5 <b>slight</b> 90:21 <b>slightly</b> 72:15,17 74:8,16 75:1 89:5,6,23 <b>small</b> 21:17 22:9 34:12 108:9,15 <b>snippets</b> 100:21 <b>social</b> 24:7 <b>society</b> 49:14 50:7 111:2,3	<b>sold</b> 25:18 26:3 <b>solely</b> 42:21 <b>solicitor</b> 4:20,24 87:15,17 <b>somebody</b> 10:14 62:18 67:13 108:11 117:17 <b>someone's</b> 96:6 <b>somewhat</b> 30:6 107:10 115:1 117:13 <b>soon</b> 31:1 51:9 51:13 <b>sorry</b> 53:4 71:5,7 72:1 78:18 91:3,8 98:6,8 112:24 113:12 120:6 <b>sort</b> 4:9 13:24 25:13 26:12,21 26:22 30:10 32:2,15 33:22 35:5,17 37:16 37:20 38:5,5 40:11 42:4 53:21 59:7 61:19 67:6,24 69:4,13,22 75:8,20 79:4 83:24 85:7 88:16 97:9,11 101:24 109:8 111:12 117:9 119:2 <b>sorts</b> 101:21 <b>sought</b> 9:19 43:20 <b>soul</b> 59:23 <b>source</b> 86:24 88:9 107:1 110:3 <b>sources</b> 25:2,19 109:2 <b>so-and-so</b> 37:18 <b>speak</b> 29:4 <b>speaking</b> 119:13 <b>special</b> 16:9 17:2 17:10 92:13 <b>specific</b> 14:10 119:15 <b>specifically</b> 33:8 78:6 <b>spectrum</b> 4:23 24:10 <b>speculate</b> 10:11 10:12 45:12 90:10 <b>speculated</b> 88:14 <b>speculating</b> 56:3 <b>speculation</b> 39:25 45:13 62:6,9 85:10 <b>spend</b> 7:25 8:9 15:21 16:20 <b>spent</b> 4:21 <b>spider's</b> 32:1 36:18	<b>Sport</b> 76:11 <b>stage</b> 35:25 37:21,24 43:19 50:16 53:22 62:4 70:25 71:4,25 72:15 72:21 83:5 96:10 103:9 <b>stages</b> 87:17 <b>stand</b> 62:23 95:19 106:8 <b>Standards</b> 117:2 117:7,9 <b>start</b> 1:18 4:13 107:13 109:5 113:8 <b>started</b> 6:1 21:25 22:7 24:15 26:7 29:22 53:5 <b>starting</b> 12:1 26:7 46:4 <b>state</b> 14:4 <b>stated</b> 68:9 72:7 82:8 <b>statement</b> 1:15 2:8,12,22,25 3:6,11,13,16 3:21 4:3,7,15 8:12 11:9 13:20 21:15 22:11,18 23:12 26:24 27:8 31:6,6 32:1,22 37:5,6 38:8,9 39:13,22 49:7 65:7 66:2,14 71:2,6 86:6,16 88:2,15 102:4 102:7 104:11 112:3 113:10 113:14 118:11 <b>statements</b> 1:14 2:3,6 4:1,6 24:24 27:2 <b>States</b> 5:13 <b>statutory</b> 116:11 <b>steer</b> 57:14 60:16 <b>step</b> 47:13 <b>steps</b> 17:18 50:15 67:4 <b>Steve</b> 33:11 35:14 <b>Steven</b> 106:7 <b>stock</b> 71:19 <b>stood</b> 11:18 64:9 90:18 <b>stop</b> 17:19 67:1 119:2 <b>stopping</b> 119:1 <b>story</b> 12:20,21 13:2 18:17,20 76:9 <b>straight</b> 44:25 59:15 83:21 <b>straightforward</b> 78:2
<b>S</b> <b>safeguards</b> 63:23 <b>sample</b> 93:6 <b>sanction</b> 14:1 96:21 <b>sanctions</b> 14:20						

<b>Strasbourg</b> 67:15,17	103:18,21,25 111:20	35:2 59:19,21 63:15 67:4,14	48:23 53:12 73:5,12 77:18	84:6,23 86:7 88:15 89:7	34:5 35:14 38:19 39:24	<b>track</b> 13:19
<b>stream</b> 58:10	<b>superiors</b> 12:14	69:16,18 81:11	86:8 96:8,9	90:22 91:1,12	43:6 58:5,8	<b>tracked</b> 97:15
<b>strength</b> 86:2	<b>supplied</b> 74:7	81:17 85:24	97:6 107:15	91:22,24 93:10	69:25 75:18	120:9
<b>stress</b> 23:17	<b>supply</b> 19:16	96:3 114:13	113:18 115:8	95:1,2,10 96:1	79:18 90:14	<b>tracking</b> 109:17
114:15	36:11	117:10	<b>terrain</b> 8:10	96:19 99:23	110:20 114:7	110:4
<b>stressed</b> 115:5	<b>supplying</b> 25:1	<b>taken</b> 2:1 24:25	<b>test</b> 10:22	100:1,10,14,18	117:25	<b>trade</b> 38:25
<b>strict</b> 17:11	35:15	28:12 48:10	<b>tested</b> 10:5,16	101:25 102:7	<b>throwned</b> 67:19	40:15 87:24
<b>strong</b> 56:14,15	<b>support</b> 54:3	62:21 67:17	<b>tether</b> 98:3	103:6 105:21	<b>thrust</b> 36:1	<b>Trading</b> 5:4
80:23 96:18	<b>suppose</b> 18:7	73:20 74:10,12	<b>thank</b> 1:13 2:4,5	105:25 106:7	111:24	<b>trail</b> 31:14,23
98:9	23:17 58:1	76:4 100:24	2:25 4:5 5:18	106:12 107:14	<b>tie</b> 36:20	<b>train</b> 95:15
<b>stronger</b> 42:17	69:7 116:22	103:16	11:19 20:12	109:3,22,24	<b>tied</b> 17:12	<b>trained</b> 4:20
<b>strongly</b> 65:21	<b>supposed</b> 22:15	<b>talk</b> 13:8 40:16	24:14 26:23	110:15 111:8	<b>time</b> 7:25 8:20	<b>training</b> 97:12
109:14	119:3	53:13 66:6	27:12 59:18	112:11,19,21	8:22 11:5,13	<b>transactions</b>
<b>structure</b> 23:7	<b>sure</b> 11:5,6,11,15	88:21 103:5	64:19 67:8,14	112:23 115:2,8	13:15 15:22	86:23,25 87:4
<b>stuff</b> 30:23 75:24	27:23 30:25	110:25	68:24 102:1,21	116:4 117:13	16:20 20:16,16	87:7 88:10,11
76:2	31:8,12,13	<b>talked</b> 49:15	104:8,18	117:19 118:5	20:22 21:23	89:25 90:5
<b>style</b> 30:5	33:21 43:4,22	<b>talking</b> 11:12	110:16	118:16,17,25	23:3,19 25:9	92:17,24 94:12
<b>subject</b> 15:19	47:20 55:7	50:7 81:6,13	<b>thematically</b>	119:20,21	26:6 29:8	104:24
17:25 18:16	58:16 66:10	86:7 88:22	4:12	<b>thinking</b> 40:4	30:25 31:5	<b>transcript</b> 29:14
63:22 73:13	88:14 100:7	96:3 108:19	<b>theoretical</b> 71:4	51:22 62:3	32:16 34:6	82:17,18,24
117:21	101:7 103:23	<b>tank</b> 5:11	71:13 72:22	65:6 116:23	37:1 45:13	<b>transform</b> 118:8
<b>submitted</b> 2:6,11	108:6 109:13	<b>tapped</b> 25:22	73:1 74:10	<b>third</b> 3:6,25 37:6	46:2,5,24	<b>transmitted</b> 7:13
115:16	119:14	<b>target</b> 31:17 36:8	<b>they'd</b> 62:11	47:23 48:1,2	47:22 49:2	<b>transposed</b> 8:24
<b>subsection</b> 7:3	<b>surface</b> 70:3	<b>targeting</b> 97:2	67:15	59:4 88:1	53:3 58:14,22	<b>treasure</b> 31:7
16:10 20:6,7	112:5	<b>targets</b> 35:13,18	<b>thing</b> 26:21	109:15	60:13 63:9	32:8
20:14,14,20	<b>surprise</b> 60:6,7	36:4 52:25	29:10 37:16	<b>Thomas</b> 1:6,8,10	64:16,25 68:19	<b>Treasury</b> 22:2
21:3	<b>surprising</b> 26:14	56:7	69:12 111:12	1:12,13,23 2:9	68:23 70:1	<b>treated</b> 106:16
<b>subsequently</b>	<b>suspect</b> 69:8	<b>tariff</b> 97:12	<b>things</b> 27:18 46:3	3:10 4:9,17	71:19 75:25	<b>tree</b> 112:2
28:6 71:3	107:3 108:6	<b>tasks</b> 27:18	46:17,22 49:1	5:18 6:19 8:10	79:6 80:18	<b>trial</b> 73:7 74:22
<b>substantial</b>	<b>suspicious</b> 32:19	<b>tax</b> 24:5 26:4	60:4	15:25 18:25	81:15 82:17	75:5 82:17
34:15 57:7	<b>swallow</b> 82:8	<b>Taylor</b> 72:3 83:1	<b>think</b> 2:7,13 4:18	24:14 26:23	84:1 85:15	85:7 87:18
<b>substantiated</b>	<b>sworn</b> 1:8	87:13	5:11 6:5,23	29:13 41:23	90:12 108:18	93:13 96:21
98:11	<b>sympathise</b> 59:9	<b>team</b> 21:11,17,20	7:15,15 8:1,23	44:8 47:4,25	111:9 116:13	<b>triated</b> 14:5,6
<b>success</b> 111:8,9	<b>system</b> 46:13	22:9,12,16,16	9:11,12,17	49:6 51:4	116:23 117:13	<b>Tribunals</b> 5:9
<b>successful</b> 39:4	81:1	24:16 26:20	10:2 11:11,15	52:21 53:23	119:19,22	<b>tricky</b> 68:15
51:17 69:13	<b>systematic</b> 98:15	32:24 34:5,12	11:19 13:5,12	55:7 58:15,19	120:13,23	<b>tried</b> 46:2
118:25		34:15 35:21	14:3 19:1,12	59:25 61:16	121:8	<b>triggered</b> 28:9
<b>successor</b> 70:4	<b>T</b>	36:23 50:17,18	19:17 20:23,24	64:19,25 65:10	<b>timeously</b> 2:12	<b>trouble</b> 46:13
<b>suddenly</b> 32:17	<b>tab</b> 2:13 3:2,7,15	50:21 90:11	21:9,22 22:11	68:18 70:15	<b>times</b> 21:21 26:1	<b>trove</b> 31:7 32:8
<b>sufficient</b> 19:17	3:17 8:8 22:19	110:11	22:21 24:23,25	71:1 73:3,21	40:4,5,13	<b>true</b> 42:6 106:18
43:2,12 48:16	26:11 32:22	<b>teams</b> 21:22	25:2 26:20	77:25 81:3	42:12 61:3	<b>trustee</b> 5:15
48:17 80:14	38:8 52:2	<b>team's</b> 35:24	27:15 28:14	86:13 91:23	103:4,6,10,15	<b>truth</b> 1:16 71:1
89:11 91:1	56:25 65:7	<b>technology</b>	29:19 30:5,11	98:5 99:5,21	103:18,18,21	<b>try</b> 47:3 107:18
<b>suggest</b> 51:14,15	71:8 73:11	108:21	30:12 31:5,11	102:1 104:19	103:25 111:20	<b>trying</b> 4:18 13:19
56:19 64:16	76:12,15 82:21	<b>Telecom</b> 84:22	31:25 33:5	107:14 109:17	<b>today</b> 1:6 95:7	28:5 55:3
74:8 79:14	86:11 91:20	96:16 106:9	34:17 35:6,20	113:6 114:16	97:14	59:25 75:8
114:17	97:25 102:6	<b>Telegraph</b> 25:21	40:6,10 41:3,5	115:15 118:13	<b>taking</b> 61:9	77:25 78:1
<b>suggesting</b> 49:8	103:8 104:12	<b>telephone</b> 13:7	41:24 42:2,18	120:12	<b>told</b> 9:1 26:19	113:3
54:16 80:13	113:10,22	24:8 25:23	45:1,4 46:24	<b>Thorogood</b> 57:4	28:16 35:8	<b>Tuesday</b> 4:4
86:9 93:10	119:14 121:3	41:14 56:24	47:14 49:8,17	68:8	44:14 45:13	46:20
95:4,18 101:20	<b>table</b> 70:24 92:6	90:1 99:1	50:5 51:1,4	<b>thought</b> 11:9	47:16 55:12	<b>turn</b> 40:25 41:4
102:11	92:15 94:10	105:3,8,9	52:21 53:6	12:12 45:21	58:1 64:11	56:23 83:21
<b>suggestion</b> 23:20	100:24,24	109:3,19	54:18,19,25	46:18 49:2	82:5,11 83:3	<b>turned</b> 49:19
34:13	102:2 103:21	<b>tell</b> 4:13 12:20	55:21 56:22	56:22 70:16	119:21	65:15 71:20
<b>suggestions</b> 85:4	103:22,23,24	21:15 22:18	58:17 61:17	78:3 79:1	<b>top</b> 49:13 76:15	<b>turning</b> 85:12
<b>suggests</b> 27:21	103:25 111:16	23:11 24:14	62:23 63:2,4	89:25 119:1	110:10 114:4	<b>two</b> 2:23 5:20
35:17 51:17	111:18	27:14 119:9	63:12 64:15,20	<b>thousands</b> 21:8	<b>topic</b> 85:22,22	10:21 19:19
110:23	<b>tabloid</b> 25:23	<b>telling</b> 96:16	65:13 66:7,11	89:16	104:9,9	20:19,25 21:1
<b>suitable</b> 63:23	<b>tabulate</b> 101:3	<b>tells</b> 28:7 50:8	67:4,4,23,24	<b>thrashing</b> 48:19	<b>total</b> 69:22 111:8	22:6,12 25:9
<b>sum</b> 26:12 47:3	<b>tabulated</b> 102:11	<b>ten</b> 51:22	68:12,23 69:20	<b>threat</b> 72:16	<b>totally</b> 72:24	29:23 30:11,16
80:23	<b>tabulating</b>	<b>tend</b> 116:18	69:23 70:8,24	114:16,17,19	107:10	34:5 40:16,23
<b>summarise</b>	108:16	<b>terms</b> 3:18 8:16	71:21 72:4	114:23 115:1	<b>touch</b> 13:16 14:9	47:4,18 52:8
29:19	<b>tabulations</b>	9:13 12:10,17	73:15 75:1	<b>threatening</b>	14:19 24:18	54:6 56:10
<b>summary</b> 118:23	105:22	13:23 15:7	76:6 77:7,9,12	114:24	<b>touched</b> 115:18	58:4,8,13
<b>Sunday</b> 25:20,21	<b>take</b> 10:10 16:16	23:15 31:20,22	77:23 78:3,4	<b>three</b> 4:21 5:10	118:1	69:18 74:23
103:4,6,10,15	17:18 33:25	31:23 32:10	80:8 82:25	5:10 8:13 25:9	<b>touches</b> 38:11	75:18 77:21
						84:10,13 87:22

90:20 92:9 110:20 111:23 119:25 <b>type</b> 86:25 87:3,5 87:7 88:11	105:17 <b>usually</b> 106:20 <b>usurp</b> 115:21	33:15,18,20,22 39:12 45:19 46:15 47:2,3 54:10,15 55:14 55:21 59:8 61:20 63:20 67:15 70:10,19 72:17 73:9 85:1,4,6 88:18 88:19 107:17 107:24 118:6 119:6 <b>ways</b> 54:6 68:18 69:21 82:6 100:15 116:5	33:16 37:9,16 55:17 74:25 96:22 <b>Whitehall</b> 5:15 <b>Whittamore</b> 3:4 7:14 13:10,14 13:25 31:16 33:11 35:14 52:10 78:22 84:14 93:25 96:6 102:20 106:7 108:2 109:1 <b>Whittamore's</b> 31:16 <b>wide</b> 32:14 <b>wider</b> 35:18 96:23 <b>wisdom</b> 9:8 <b>wise</b> 66:23 <b>wish</b> 47:19 64:7 115:21 <b>wished</b> 114:15 <b>witness</b> 1:6,13 2:6 3:13,25 4:15 8:11,12 21:15 22:18 23:11 24:23 26:24 27:1,8 32:1,21 37:5 38:7,9 49:7 65:7 71:2,6 86:15 88:15 102:4 104:11 113:10,14 <b>wonder</b> 44:16 99:22 <b>word</b> 34:20 39:10 44:13,15 60:12 77:11 99:23 <b>words</b> 2:17 4:17 7:6 34:24 35:2 44:17 63:3 67:16 95:17 <b>work</b> 10:7 25:25 62:20 76:14 <b>worked</b> 61:21 <b>working</b> 49:18 49:21 110:3 <b>World</b> 25:19 103:17,20 104:1 <b>worst</b> 110:10 <b>wouldn't</b> 9:22 11:23 31:22 35:18 44:21 48:25 72:22 94:16 114:25 <b>wrapped</b> 77:20 <b>writ</b> 61:19 <b>write</b> 44:13 48:2 64:14 72:9 113:17 <b>writing</b> 48:13 89:9 90:22 95:6 98:19	<b>written</b> 28:1 30:8 31:5,6 58:12,14,17 60:7,14,14 83:2 87:10,12 96:25 121:4 <b>wrong</b> 24:3 47:21 55:18,20 85:3 109:25 112:2,2 <b>wrote</b> 39:13,21 57:21 66:2 103:12,13,14 116:13	109:16 <b>13,000</b> 88:10 <b>13,343</b> 3:3 86:23 89:13 <b>14</b> 26:24 38:9 <b>150</b> 97:13 <b>16</b> 2:25 39:13 <b>17.50</b> 100:11 <b>18</b> 29:21 93:6 <b>19</b> 79:1 <b>1973</b> 4:20 <b>1979</b> 5:1 <b>1986</b> 5:3 <b>1992</b> 5:4 <b>1994</b> 8:19,23 <b>1998</b> 8:24 92:15	<b>3</b> 3 32:22 34:9,22 52:1 56:25 63:5 <b>300,000</b> 6:23 <b>300,435</b> 102:15 <b>305</b> 88:2 92:7 <b>32</b> 7:20 8:3 15:16 15:22 16:1 17:23 18:18,25 <b>32(1)(a)</b> 16:7 <b>33459</b> 22:20 32:22 <b>33460</b> 37:5 65:8 <b>361</b> 63:14 <b>39</b> 113:9,13			
<b>U</b> <b>unable</b> 80:8 <b>unacceptability</b> 69:22 <b>unacceptable</b> 63:21 75:8 117:11 119:2 <b>unauthorised</b> 24:12 <b>underline</b> 52:21 <b>underlined</b> 28:2 <b>underlying</b> 18:8 <b>underneath</b> 82:21 <b>underplay</b> 73:25 <b>underresourced</b> 21:23 <b>understand</b> 8:21 9:16,21 13:1,3 13:15 43:14,17 44:21 48:2 59:5,9 76:22 83:18 90:3 94:20 95:23 98:22 99:25 112:8 <b>understanding</b> 9:7 34:6 40:22 41:24 48:5 65:13 66:6 79:7,8 83:12 84:23 95:11 116:3 <b>understated</b> 99:4 <b>understood</b> 35:21 49:10 116:24 <b>undertaken</b> 16:10 <b>undoubtedly</b> 108:14 <b>unique</b> 4:15 <b>unit</b> 22:25 23:1 <b>United</b> 5:13 <b>unlawful</b> 12:9 99:7 <b>unlawfully</b> 12:8 <b>unlimited</b> 14:6 <b>unpalatable</b> 85:16 <b>unreasonable</b> 59:12 <b>unreserved</b> 103:15 <b>URN</b> 76:13 104:13 <b>use</b> 9:4 14:18 15:3 19:11,18 31:22 32:8 66:25 90:21 95:17 100:12	<b>V</b> <b>various</b> 2:1 4:19 6:7,9 11:14 27:18 31:24 32:5 35:22 38:22 60:2 72:9 75:10 77:15 82:6 94:11 <b>version</b> 14:2 104:2,6,13 <b>view</b> 12:22 16:11 16:13 18:22,24 24:4 43:11 54:7,11 56:16 57:19 59:6,7,7 62:20 63:1 68:24 69:6,16 69:18 89:10 93:4 116:15,22 <b>vigorously</b> 50:3 <b>vindicated</b> 32:19 <b>virtually</b> 69:23 97:13 <b>vis-a-vis</b> 28:8 83:15,20 <b>vivid</b> 4:10 <b>voice</b> 1:20 <b>volume</b> 114:8	<b>wealth</b> 31:9 <b>web</b> 32:1 36:18 <b>website</b> 108:9 <b>websites</b> 108:15 <b>week</b> 1:19,20 4:4 5:10 25:4 27:22 28:16 41:3 46:20 49:11,12 <b>weekend</b> 13:21 <b>weeks</b> 40:23 43:7 52:23 58:8,23 <b>weight</b> 100:16 <b>well-crafted</b> 100:5 <b>went</b> 4:23 38:2 40:7 45:15 49:11 61:4 77:15 103:10 <b>weren't</b> 39:7 40:12 44:9 50:14 55:5 60:21 77:21 114:18 <b>we'll</b> 2:10 3:4 11:5,19 21:2 36:22 39:19,23 50:24 53:13,18 56:10 57:22 64:21 75:22 106:2 110:24 113:7 118:14 119:8 <b>we're</b> 3:9 4:16 11:6 12:21 14:1 15:21 16:22 17:5 40:3 49:5 51:2 51:3,25 53:19 62:14 64:18 75:13 88:21,22 89:9 91:14 94:6,16,17 96:3 102:17,22 108:18 116:12 119:5 <b>we've</b> 8:10 11:20 21:19 73:11 93:12 101:9,23 113:18 115:2,8 118:1 <b>whatsoever</b> 6:20	<b>Y</b> <b>year</b> 2:13 23:5 70:5 93:6 <b>years</b> 4:21 20:23 22:6 29:22,23 30:11 58:5 69:15 75:18 108:18 110:17 116:10 <b>yesterday</b> 61:3	<b>0</b> <b>00258</b> 4:16 5:20 <b>00269</b> 113:11 <b>00296</b> 98:1,7 <b>00298</b> 26:11 <b>00335</b> 91:22 92:4 <b>0035</b> 101:8 <b>00360</b> 113:23 115:14 <b>00361</b> 63:13 <b>00363</b> 119:14 <b>00708</b> 73:11 <b>07721</b> 102:8 <b>07723</b> 38:10 <b>07726</b> 86:17 <b>07727</b> 89:22 <b>07741</b> 83:4 <b>08029</b> 15:23 <b>08033</b> 14:22 <b>08039</b> 19:6 <b>08046</b> 19:20 <b>08053</b> 8:9	<b>1</b> 1 2:13 4:14 6:3 7:3,3 20:14 113:10 <b>1.00</b> 121:11 <b>10</b> 21:14 27:15 27:21,22,23 30:24 31:2 67:18 68:20,20 70:11 84:4 119:14 <b>10.00</b> 1:2 <b>11</b> 23:11 121:3 <b>11.36</b> 64:22 <b>11.42</b> 64:24 <b>12</b> 24:14 <b>13</b> 26:24 104:12 104:16,22	<b>2</b> 2 4:14 20:7,14,20 22:19 52:2 91:21,22 121:10 <b>2,025</b> 89:17 <b>20</b> 20:22 56:25 113:19 <b>200</b> 97:13 <b>2000</b> 5:25 <b>2002</b> 2:18 4:19 5:6,6 6:1 25:16 25:21 <b>2003</b> 26:1 27:5 27:15,21 37:2 37:25 39:17 40:7 43:11 45:1,2 49:12 50:11 51:4 52:1 56:25 64:10 65:1,25 66:7 111:10 113:17,19 <b>2004</b> 37:3 61:10 66:7,11 67:21 72:1 87:19 <b>2005</b> 6:3 36:3 37:3 49:1 68:4 71:22 73:7 74:14 79:1 80:10 81:4,7 84:12 87:19 <b>2006</b> 20:20 36:3 49:1 69:24 88:5 110:19 <b>2007</b> 36:3 49:1 67:12 76:18 <b>2008</b> 11:3,18 36:3 <b>2009</b> 2:19,21 4:19 5:6 <b>2011</b> 1:1 3:1,6 <b>21</b> 3:11 <b>22</b> 58:7,12 65:1 65:25 113:21 <b>228</b> 104:2 <b>27</b> 3:16 60:16 81:7 115:9 119:12	<b>3</b> 3 26:11 35:6 52:2 52:2 57:1 63:7 72:3 73:11 97:25 113:17 <b>4.10</b> 25:14 <b>4.11</b> 26:12 <b>4.9</b> 26:9 <b>4.9</b> 26:9 <b>40</b> 14:21 76:17 76:21 <b>400</b> 50:13 <b>43</b> 19:2 21:5,13 <b>46</b> 2:14 <b>48</b> 107:6,13,24 <b>48710</b> 52:1 53:21 <b>48711</b> 53:25 <b>48714</b> 56:25 <b>48717</b> 58:24 <b>48718</b> 59:4 <b>48740</b> 72:2 <b>48761</b> 68:1 <b>48808</b> 81:24 <b>48813</b> 82:7 <b>48890</b> 104:17	<b>4</b> 4 26:11 35:6 52:2 52:2 57:1 63:7 72:3 73:11 97:25 113:17 <b>4.10</b> 25:14 <b>4.11</b> 26:12 <b>4.9</b> 26:9 <b>4.9</b> 26:9 <b>40</b> 14:21 76:17 76:21 <b>400</b> 50:13 <b>43</b> 19:2 21:5,13 <b>46</b> 2:14 <b>48</b> 107:6,13,24 <b>48710</b> 52:1 53:21 <b>48711</b> 53:25 <b>48714</b> 56:25 <b>48717</b> 58:24 <b>48718</b> 59:4 <b>48740</b> 72:2 <b>48761</b> 68:1 <b>48808</b> 81:24 <b>48813</b> 82:7 <b>48890</b> 104:17	<b>5</b> 5 5:18 15:10 58:24 121:6 <b>5,000</b> 88:10 <b>5,025</b> 86:24 87:7 88:11 <b>5.17</b> 121:6 <b>5.3</b> 97:24 98:2,7 109:11 <b>5.35</b> 100:23 <b>50</b> 3:1 <b>500</b> 97:17 <b>51</b> 19:20 20:7,14 <b>51(b)</b> 9:13 <b>52</b> 20:13,13,20 <b>53</b> 3:2 38:8 102:6 <b>54</b> 3:22 86:11 <b>547,160</b> 102:15 <b>55</b> 8:7,11,17 9:14 10:3,14,17 14:3 21:16 22:17 23:12 24:18 28:3,8

42:13,20 43:1 44:15 45:20 49:17 50:3,3 62:3 74:1 78:24 79:5 84:25 93:5 96:10 105:10 105:14,20 114:1 <b>55(1)</b> 94:21 <b>55(1)(a)</b> 9:3 <b>55(1)(b)</b> 10:9 39:4 <b>55(2)(d)</b> 10:18 <b>56</b> 82:21 <b>58</b> 3:7 <b>59</b> 3:11,15 22:19 32:22 65:7 71:8 119:7 <b>59A</b> 3:17 104:12						
<hr/> <b>6</b> <hr/>						
<b>6</b> 2:13 3:21 37:5 84:12 91:20 <b>6,330</b> 89:24 <b>6.8</b> 38:11 73:11 73:23 <b>60</b> 14:3 <b>62</b> 8:8 <b>65</b> 97:16 109:7						
<hr/> <b>7</b> <hr/>						
<b>7</b> 3:6 65:8,9 66:2 71:1,10 102:7 102:12 <b>75</b> 97:16 109:7 <b>750</b> 97:16 100:21 <b>7726</b> 86:19						
<hr/> <b>8</b> <hr/>						
<b>8</b> 27:5 28:12 65:8 66:14 92:2,3 113:22 <b>80</b> 76:12,15 <b>84</b> 20:24						
<hr/> <b>9</b> <hr/>						
<b>9</b> 1:1 14:11 68:6						