

1 Thursday, 9 February 2012 2 (9.30 am) 3 MS PATRY HOSKINS: Good morning, sir. It's going to be 4 another busy day and we're kicking off this morning with 5 Mr Lyons. You'll see him, he's live on video-link. I'm 6 just going to check that he can see us and hear us. 7 LORD JUSTICE LEVESON: Yes. 8 MS PATRY HOSKINS: Mr Lyons, this is Ms Patry Hoskins. Can 9 you hear me and can you see me? 10 MR LYONS: Yes, I certainly can. Good morning. 11 MS PATRY HOSKINS: Good morning. 12 LORD JUSTICE LEVESON: Probably not morning for you. 13 MR LYONS: No, it's the evening, sir. 14 LORD JUSTICE LEVESON: Right. 15 MS PATRY HOSKINS: Mr Lyons, I think you have a copy of the 16 oath with you. Could you please hold the Bible and read 17 it out. Thank you. 18 MR DARRYN PAUL LYONS (sworn) 19 Questions by MS PATRY HOSKINS 20 MS PATRY HOSKINS: Could you please state your full name for 21 the Inquiry? 22 A. Darryn Paul Lyons. 23 Q. Mr Lyons, you've provided a short statement to the 24 Inquiry and a short CV. Can you confirm that the 25 contents of your statement and your CV are true and Page 1	1 world's number one online celebrity destination, 2 mrpaparazzi.com"? 3 A. That's correct. 4 Q. I think it's fair, isn't it, that unlike one witness 5 we've had recently you have no problem with the term 6 "paparazzi", would that be right? 7 A. No, it's only another word in the English language. 8 Q. Let's start with Big Pictures and the scale of 9 Big Pictures. You explain in your statement that you 10 employ 29 members of staff, plus you have 152 casual 11 workers. Is that still fair and accurate? 12 A. That is correct. 13 Q. How many of the employed staff are photographers? 14 A. Around about 10 or 12 are staff photographers. 15 Q. You tell us that they work on a salary and the 16 freelancers will work on a commission basis. 17 A. That is correct. 18 Q. Once you have the photographs from either your staff 19 photographers or the freelancers, your job or your 20 agency's job is to arrange to sell them on to 21 a magazine, newspaper, or whatever? Have I summarised 22 that accurately? 23 A. Absolutely. Yes, you have. 24 Q. Can I ask you now about the way in which your 25 photographers, either freelance or employed, are Page 3
1 accurate to the best of your knowledge and belief? 2 A. Yes, that's true. 3 Q. Your career history, Mr Lyons, is set out in 4 considerable detail in the CV or biography document. 5 For the purposes of this Inquiry, we don't need to go 6 into it all, and it's probably sufficient to note a few 7 facts. I'm just going to summarise them and if you just 8 tell me whether I'm right, that would assist. 9 You were originally from Australia, but you moved to 10 London some 25 years ago now and started working for the 11 Daily Mail as a freelance photographer. Correct so far? 12 A. Yes, that's correct. 13 Q. You worked there for some years, and whilst working 14 there, you set up your own picture agency, an agency 15 which is now known as Big Pictures? 16 A. That is correct. 17 Q. You then left the Daily Mail and continued to expand 18 Big Pictures and it's now a global enterprise with 19 offices all over the world? 20 A. Well, not quite all over the world, but in two 21 countries, yes. 22 Q. Okay. You have written a book about your experiences 23 called "Mr Paparazzi", published in 2008. You've also 24 participated in a BBC documentary called "Paparazzi" and 25 you've also now created what you describe as "the Page 2	1 regulated? Let's start with freelancers, please. Are 2 they entirely self-employed or do they have some form of 3 rolling contract with you? 4 A. No, freelance photographers are self-employed. They -- 5 we may give them some kind of a direction on a daily 6 diary in and around London, but also agencies, foreign 7 agencies have freelance photographers which supply them, 8 which then, on a relationship between the two companies, 9 we sell their pictures in either London or whatever 10 rights around the world that we have particularly. 11 So, no, they aren't regulated. They go out and they 12 get their own stories and their own images and then we 13 make a decision whether we publish them or not. 14 Q. All right. You expressly say in paragraph 10 of your 15 statement to the Inquiry that freelancers are not really 16 Big Pictures' responsibility. What do you mean by that? 17 A. Basically when I say they're not our responsibility, 18 freelance photographers submit to many different 19 agencies. They'll also submit to different magazines. 20 They'll also submit to various newspapers and magazines 21 and possibly TV stations. So freelancers, they will 22 have an agreement with different companies to supply the 23 pictures. Sometimes freelancers, very common today, 24 supply their pictures to several agencies, hoping to get 25 as many sales around the world as possible. Page 4

1 So they actually run themselves. Some take 2 direction from the agency and my staff within the 3 agency, ie photo editors or sales directors, but that's 4 very, very rare. Most of them actually get their own 5 information, their own ideas, whether it be home or 6 abroad. 7 Q. Did you also intend to mean that their behaviour is not 8 your responsibility? 9 A. Well, they're not employed by us. My staff are employed 10 by me so as far as I'm concerned my staff, it is within 11 my responsibility, but also we make pretty decent checks 12 on the photographers that do supply us and we also 13 scrutinise the images that come in, and if there are any 14 questions to ask about the images, my dedicated team in 15 my London office would ask the questions that needed to 16 be asked. 17 Q. What kind of questions would you ask of a photographer 18 when a photograph came in? Give us an example. 19 A. It would depend on what the subject would be. It would 20 depend totally on the image. You have to remember 21 Big Pictures turns over probably about 3 to 3 and a half 22 thousand images a day, so it would have to be 23 something -- if a question was asked, it would have to 24 be scrutinised by the team, but that would happen in 25 a pretty rare situation, unless a newspaper or Page 5	1 Q. -- you would reject a photograph. 2 A. Whether it be extreme nudity, whether it be extreme -- 3 a situation where we felt that the photographer would 4 have crossed a line, whether it was taken on private 5 property, those kind of examples, which would normally 6 stick out like sore thumbs to us, or if the picture 7 would have come that looks as if it had been taken, you 8 know, from out of a magazine or a foreign publication or 9 such like. 10 Q. All right. 11 LORD JUSTICE LEVESON: I'd like to know, Mr Lyons, just 12 picking up on what you've just said, what is "the line"? 13 Where is your line? 14 A. Well, the line is, sir, along with the PCC line. The 15 PCC line is what we use. 16 MS PATRY HOSKINS: Just sticking with freelancers for the 17 moment, you've told us that essentially they're not your 18 responsibility, but you ensure that photographs given to 19 you by them are scrutinised carefully; is that a fair 20 assessment? 21 A. Absolutely. 22 Q. Are you happy that in general terms your freelancers 23 behave in a way that you would describe to be ethical? 24 A. I wouldn't be responsible for foreign agencies around 25 the world, but particularly the freelancers that supply Page 7
1 a magazine or our photo editors or sales director looked 2 at it and thought possibly there may be something odd 3 about that particular picture. 4 Each picture that comes in would be dealt with on 5 its merits. 6 Q. All right. So can I summarise your evidence like this: 7 in most cases you wouldn't need to ask any questions 8 because it would be obvious from the photograph that no 9 questions needed to be asked, but in a rare case -- 10 that's your word -- you might ask some questions. Are 11 there any photographs that you would simply never 12 accept? You say in your statement that you've rejected 13 photographs on several occasions. Give us an example of 14 a photograph that you would reject or have rejected. 15 A. Look, it would be a -- look, to be absolutely specific, 16 there would be many, many cases. To have one specific 17 off the top of my head would be difficult. But there 18 would be pictures that we would find unsaleable simply 19 because the person particularly -- it was taken not in 20 accordance with how we would take pictures. 21 Q. Try and give me an example, if you can. It doesn't have 22 to be a specific example of one photograph you've 23 actually seen, but give me an example of a situation 24 where -- 25 A. Okay -- Page 6	1 my offices in Australia and London, yes. 2 Q. Okay. Let me ask you about employed photographers now. 3 You explain in your statement that there is no 4 Big Pictures code of practice, no manual governing 5 behaviour of employees, but photographers are informed 6 of what is expected of them. Was that just the employed 7 photographers you were talking about there? 8 A. Look, the employed photographers by the agency know 9 exactly and would have been briefed when they were 10 employed by the CEO or the manager or the sales 11 directors in this case of exactly what was expected of 12 them. 13 Q. You go on to say that they know what they can or cannot 14 do, and this is based on the PCC recommendations. What 15 do you mean by the PCC recommendations? 16 A. There is a -- in recent years, certainly the PCC has 17 laid down reasonable guidelines that photographers 18 should and should not act with, so it is -- if someone 19 is in a public place, the fact of the matter is that 20 I look at a public place, the company looks at a public 21 place as recording a picture. 22 Now, the PCC, not that I am overly familiar with it 23 now as I explained to you earlier, I haven't had much 24 time to look over the documentation, but photographers 25 have to make their own judgment with regard to who and Page 8

1 what they photograph and in what circumstances, guided 2 by the management in my office. 3 Q. Right. So when you say "the PCC recommendations", do 4 you mean the PCC code? Do you mean another document? 5 I'm just -- I just want to understand -- 6 A. The PCC code. 7 Q. You mean the PCC code, all right. Again, in relation to 8 your employed photographers, are you satisfied that they 9 behave in a way that you would describe to be ethical? 10 A. I have no reason to believe from my management that they 11 don't. 12 Q. Right, okay. You've explained how your photographers 13 are expected to behave. You have also explained the 14 types of questions that you might ask before you accept 15 certain photographs. You've also told us that your 16 photographers act ethically. Now I want to understand, 17 please, your ethical stance and whether or not you would 18 accept certain types of images by reference to some 19 practical examples, if I can. 20 Can I start with a particular practice that's been 21 described in evidence to this Inquiry and that's the 22 practice of chasing people in cars with a view to 23 obtaining a photograph of them. You may have heard some 24 of the witnesses to this Inquiry describe being chased 25 at speed, sometimes in dangerous situations, in cars by Page 9	1 driving at crazy speeds in order to lose people. Paris 2 has always been famous for its teams of scooter-riding 3 paps. Scooters are in fact a way of life in all of 4 France. It was like that in 1997 and it is like that 5 now. Big recently got some great shots of Angelina 6 Jolie and Brad Pitt that were taken by one of our guys 7 operating from within a pack of scooters following the 8 stars' car through Paris." 9 I'll pause there. Your book was published in 2008. 10 I'm assuming that when you were saying "it's the same 11 now", you meant 2007 or 2008; would that be correct? 12 A. It would be correct. It wouldn't have been from 13 a photographer from our agency, it would have been from 14 a supplying freelance, but anyway, I'll -- yeah. 15 Q. The words that I've just quoted seem to demonstrate that 16 you would consider this type of photograph legitimate, 17 a photograph that was obtained whilst chasing someone's 18 car through the streets. It's all just part of the 19 chase and it's just a legitimate way of obtaining 20 a photograph. Is that fair and accurate? 21 A. Look, the passage of the book you're describing would 22 have been by a supplied agency. I was merely making 23 reference to what happens in the way the French -- the 24 way French photographers would work on a relevant news 25 story. And I also think from whether it be a newspaper, Page 11
1 photographers just to get an image. I don't know if 2 you've seen or heard that evidence. 3 A. I haven't, but yes. 4 Q. Pardon, sorry? 5 A. I haven't heard that evidence. 6 Q. All right. Let me start, please, with something you say 7 in your book. I did ask that you have a copy of your 8 book with you and unfortunately I think you've told me 9 that you don't have a copy of it with you. Hopefully it 10 will be familiar to you. Can I read out a passage from 11 it? 12 A. Yes. 13 MS PATRY HOSKINS: Sir, I've given you relevant extracts and 14 it's page 266 of the book. 15 LORD JUSTICE LEVESON: Yes. 16 MS PATRY HOSKINS: This part of the book is just following 17 your description of the role of the paparazzi following 18 the death of Diana, Princess of Wales. Previously 19 you've explained in this part of the book that you think 20 the chasing paparazzi were not responsible for her 21 death, but I don't want to go into that, it's another 22 topic in itself, but then you say this: 23 "I hope people realise, though, that chasing for 24 pictures has always happened and that for the quarry, 25 the option to take is not to break the law and start Page 10	1 a magazine or any freelance photographer on a news 2 story, yes, I would say that that would be the case. 3 Q. Yes, it would be a legitimate way of obtaining 4 a photograph? 5 A. If someone was not breaking the law in taking 6 a legitimate photograph, I would assume that that is 7 right, yes. 8 Q. The second point I want to draw out from that example is 9 you say that the option for the person being chased is 10 not to break the law and start driving at crazy speeds 11 in order to lose people, so would it be fair to say that 12 you consider part of the blame might lie in the fact 13 that people being chased break the law, speed up and try 14 to get away? Is that part of the problem? 15 A. Well, I can't -- I couldn't be specific because I'm not 16 a photographer on the road out there in the field. 17 You'd have to ask a photographer that. But I would 18 say -- look, the fact of the matter is obtaining 19 pictures are obtained within the law. That would be 20 what our photographers have been told on many occasions, 21 and if there has been any incidents, my management would 22 be hauling them in and asking questions why that wasn't 23 the situation. 24 Can I be responsible for a French agency that runs 25 its own agency, whether it be in the same way as I do or Page 12

1 the management I employ do? I can't answer that 2 question. 3 Q. No, the question -- 4 A. It's their responsibility to act accordingly within 5 their ethics and boundaries. 6 Q. The question I have for you, Mr Lyons, is not whether 7 you are responsible for the photograph, but whether you 8 would have any difficulty ethically with accepting 9 a photograph that had been obtained in that particular 10 way. I think the answer to that, that you've given me, 11 is: no, you would not have a problem with that? 12 A. I said it would be totally dependent on the 13 circumstances that the photograph was taken. 14 Q. All right. Let me ask you about this same topic by 15 reference to a different example, if I can. 16 LORD JUSTICE LEVESON: Mr Lyons, I think it's quite 17 important you understand I'm not inquiring specifically 18 into the operation of your business; I'm trying to get 19 an image of the culture and the practices of your 20 industry. That is taking photographs. So I'm not 21 looking for a hook to get at you; I'm simply trying to 22 learn what happens. 23 A. I understand, sir. 24 MS PATRY HOSKINS: Let me raise this same topic with you by 25 reference to a second example. I think we sent you Page 13	1 Q. It was a claim in 2009 brought on two -- 2 A. Relating to what pictures, I was asking the question. 3 Q. It was not just photographs, of course, it was two 4 different -- well, the claim had two parts: harassment 5 and invasion of privacy. So it wasn't just about the 6 taking of particular photographs. 7 A. Okay. 8 Q. It was also a claim brought because she'd been subject 9 to a campaign of harassment, as I understand it. 10 A. Okay. I wasn't -- I wasn't in charge of that particular 11 action. 12 Q. Do you remember the claim? That's all my question is 13 for the moment. 14 A. I remember -- I do remember a claim, but I don't 15 remember that specific claim, no. 16 Q. All right. Perhaps I can just tell you a bit more about 17 what it says here. Maybe that will refresh your memory. 18 She brought the claim, she was awarded £53,000 in 19 damages and costs as part of a settlement that resulted 20 in the agency's photographers being forbidden from 21 following her. As I understand it, your company had to 22 give detailed undertakings to the court including not 23 following her or chasing her in a car. Do you recall 24 that now? 25 A. Yes. Page 15
1 various links to various documents. Do you have an 2 article -- it's at tab 8 for you, sir -- it's an article 3 in the Guardian newspaper headlined "Have celebrities 4 finally snapped?" It's dated 4 May 2009. You should 5 have had a link and therefore a printout of that copy. 6 A. I don't have a printout, but I can get it up, I'm pretty 7 sure. (Pause) You'll have to refresh it, it's not 8 coming up. 9 Q. That's fine, I can do that. The section I want to refer 10 to is short. 11 A. Yes. 12 Q. This concerns proceedings brought against you by 13 Sienna Miller in 2009. 14 A. Yes? 15 Q. Now, the relevant part of the article is at the bottom 16 of the first page and it says: 17 "Both [it's referring to other injunctions which 18 we'll come back to] follow an action brought by the 19 actor Sienna Miller, who sued Big Pictures, one of the 20 biggest agencies for celebrity photographs, for 21 harassment and invasion of privacy ..." 22 Pausing there, do you remember that particular claim 23 brought by Miss Miller? 24 A. I'd like to know in relation to which particular claim 25 it was. Page 14	1 Q. Right. The article goes on to quote your chief -- well, 2 yes, your chief executive, Alan Williams, as saying: 3 "We believe in the right of a photographer to take 4 pictures in a public place." 5 And you are quoted as saying -- this is tab 7 and 6 the fact that you don't have the particular tabs is not 7 particularly helpful. Do you have an article headed 8 "Amy Winehouse wins court ban on paparazzi at her home"? 9 A. Yes, I do. 10 Q. 1 May 2009. 11 A. I think this is the one I have up here, yes. 12 Q. All right. 13 A. Yes, I have. 14 Q. At the bottom of the third page and over onto the fourth 15 page you are asked about a number of cases brought 16 against you, and -- 17 A. That's right. 18 Q. -- on the very last page of the article you say this: 19 "As for Sienna Miller I don't go near her now and we 20 throw away any pictures that come in that are taken of 21 her but I do wonder how wrong it was to photograph 22 someone on a boat in the Mediterranean and in the 23 company of a married man whose wife and children were at 24 home. What's more immoral in this case?" 25 Do you see that? Page 16

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1 A. Yes. Yes, I do. 2 Q. Can we agree that it might be said that both these 3 responses, the responses of your CEO and your response, 4 miss the point on the issue of harassment? 5 A. I think I'd like to address on this also -- 6 Q. Yes, of course. 7 A. -- and make a very valid point. 8 Q. Yes? 9 A. Miss Miller was photographed at this particular time on 10 a boat, yes, in the Mediterranean, on a boat with 11 I think it was Balthazar Getty, which was a huge news 12 story at the particular time -- 13 Q. I'm going to interrupt you because I'm on the issue of 14 harassment. The claim was brought in relation to 15 photographs which were agreed to have invaded her 16 privacy, but the claim also related to harassment, ie 17 following her in a car, chasing her and so on. Okay? 18 So at the moment can we just stick on that? I promise 19 we'll come back to the issue of privacy in a moment. 20 A. All right. 21 Q. Just sticking to harassment, your response seems to 22 suggest that you now leave Miss Miller alone. You've 23 said that here: 24 "... I don't go near her now and we throw away any 25 pictures that come in". Page 17	1 disciplined or blacklisted as a result of the 2 Sienna Miller claim or did you put out any relevant 3 guidance to them? Did you stop using certain 4 freelancers? Did anything happen as a result of that 5 claim? 6 A. (overspeaking) I couldn't answer that question. That 7 would have to be referred to Mr Alan Williams who was 8 dealing with that at the time. 9 Q. I understand, all right. Let me give you one last 10 example on this issue, please, from your book. Again, 11 you don't have it but I will read out the section. It's 12 pages 32 and 33 of the book. 13 A. Yes. 14 Q. It's referring to your time at the Daily Mail and you 15 explain that you spent much of your time loitering 16 outside the Portland Maternity Hospital, with others, 17 waiting for the Duchess of York's first child to be 18 born. 19 A. Yes. 20 Q. And while you were there, you were being teased by other 21 photographers because you didn't know how to pull off 22 a car shot. 23 A. Yes. 24 Q. And you say this: 25 "This shot required technique, luck and a whole lot Page 19
1 Am I right -- 2 A. Basic -- 3 Q. I haven't asked my question, if you just give me 4 a moment. Am I right to think in that case you leave 5 her alone but you don't necessarily agree that the 6 methods employed by your photographers were wrong? 7 A. Well, I mean, at the end the fact of the matter is that 8 celebrities court publicity when they want to court 9 publicity and then all of a sudden they want to switch 10 it off very, very soon after. I'm still trying to 11 understand the question as to what you're trying to say. 12 I mean, it was very clear what I said in that particular 13 statement. 14 Q. Yes. 15 A. That particular paragraph is totally relating to 16 different circumstances than what you're talking about. 17 I don't agree that people should be hounded up and down 18 the street all day in any shape or form, but I do agree 19 that people, as a part of historical -- as a part of 20 history, should be photographed in public places, 21 absolutely, and I'm avid about it. We have a free press 22 and a free press should be able to work in public 23 places. 24 Q. All right. Let me put this question in a different way: 25 were any of your photographers or freelancers Page 18	1 of guts. Pete gave me the lowdown and left me to 2 practice. The premise was as follows." 3 And then you set out some technical details with 4 your camera and you explain how you set your camera and 5 then you say this: 6 "You then run at the car crash, bang, wallop with 7 a wide angle lens. Rosie and I used to run up to people 8 driving home past the Portland and practice on them. 9 Must have scared the living crap out of them. Funnily 10 enough, just recently I took a call from the police who 11 were making a complaint about a couple of my big guys. 12 They were outside TV personality Ulrika Jonsson's house 13 and had been practising their car shots on a family and 14 almost caused a major accident. While this was in truth 15 no laughing matter, it did remind me of the old days." 16 A. Yes. And that particular situation was an isolated case 17 where, without question, the photographers were 18 disciplined in no uncertain terms. 19 Q. All right. So car shots are acceptable, but if they 20 cause a major accident or almost cause a major accident, 21 that might be where you draw the line? 22 A. No, madam, I think you're talking about totally 23 different times here. Historically, the terms and 24 conditions of photographs being taken in the press have 25 changed over many years. We're talking about the Page 20

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1 Portland Hospital 25 years ago, where it was common 2 practice for TV crews, camera -- staff photographers, 3 world media, there were 150 of the world's media camped 4 outside the Portland Hospital at that particular time. 5 The fact of the matter was it was standard practice to 6 get news stories directed by editors of national 7 newspapers and picture editors of national newspapers to 8 do car shots. That was your job. If you didn't get 9 that particular picture, there was a good chance you'd 10 never get another shift again on a national newspaper, 11 and that's an absolute fact. 12 Q. Do you still condone the use of car shots? 13 A. Look, the fact of the matter is in a news situation of 14 someone leaving a premises, yes, I think it is within 15 the right of a photographer to take a photograph of 16 someone in a car. 17 Q. All right. Let's deal with -- 18 LORD JUSTICE LEVESON: Just before you do. When did it 19 change? You mentioned 25 years ago and that sort of 20 activity outside the Portland and it wouldn't happen 21 now, but when did it change? 22 A. Look, I don't think it has changed, sir. I think that 23 various staff photographers of national newspapers, 24 freelance photographers all over the world, for 25 instance, at the Royal Wedding, and recently with, you Page 21	1 Then it says: 2 "[Lily Allen] obtained undertakings from two 3 photographic agencies ... and one photographer." 4 And also an injunction restraining further 5 harassment by other paparazzi photographers. 6 "Photographers covered by the order must not pursue 7 or follow Allen by any means or approach her within 8 100 metres of her home. They are also forbidden from 9 taking pictures of her in her home or the home of any 10 members of her family or friends." 11 I don't need to read any other part of it, but let 12 me read another section from the "Have celebrities 13 finally snapped" article at tab 8. Ms Allen describes 14 the circumstances in which she decided to obtain the 15 injunction. She said this at the bottom of page 2: 16 "I turned into a T-junction and they all ran a red 17 light, then tried to overtake on the inside. A woman 18 had to slam the brakes on her car as they cut in. 19 I braked too, of course, and this guy ran into the back 20 of me. I got out of the car. I was shaken up ... 21 Instead of talking to me, like a decent human being 22 would, he got his camera out and started taking 23 pictures, and I just thought, 'I've had it with the 24 press, I can't do this any more.' I got back into the 25 car and called my lawyer." Page 23
1 know, even the London riots when Camilla and Charles 2 were in particular cars, car shots were taken then and 3 they're probably being taken at some stage in London 4 today. They're a regular occurrence of news 5 photographers, and more so news photographers than 6 celebrity photographers in getting an image which 7 a newspaper or magazine may want around the world. 8 MS PATRY HOSKINS: Can we continue with some more examples, 9 please? At tab 6, for the Chairman -- you don't have 10 tab 6: 11 "Lily Allen given legal protection from paparazzi 12 harassment." 13 Do you have that article? If not, I can read out 14 the relevant parts. 15 A. Two seconds, I'll be there. It's coming up. (Pause). 16 Yes, I do. 17 Q. 16 March 2009 is the date of the article. What it says 18 is this, I'll paraphrase: essentially, Lily Allen has 19 obtained a legal injunction from the High Court to be 20 protected from harassment by two paparazzi agencies, 21 Big Pictures and another. It says it was made at the 22 High Court in March 2009, and "followed an incident 23 outside the singer's London home on Thursday in which 24 a photographer's vehicle collided with her car. After 25 the collision, photographers continued to follow Allen." Page 22	1 Again that injunction was brought and obtained 2 against your company, and persons unknown, it's true. 3 Is there anything that you want to say about that 4 particular incident or about the obtaining of that 5 particular injunction? 6 A. I don't know about the incident, I don't recall the 7 incident occurring, from my perspective. I do recall an 8 incident where, after Lily Allen got an injunction, the 9 photographers -- she walked out and revealed herself and 10 said, "You can't photograph me any more, can you?" So 11 I don't know that particular incident, and I'm sorry, 12 I can't help you there. 13 Q. All right. 14 A. I don't know what agency -- I don't know what agency it 15 was in that particular incident. 16 Q. All right. Finally, completing the picture, tab 7 17 contains the article we've already referred to about Amy 18 Winehouse winning a court ban on paparazzi at her home, 19 and again we can see from that document that an 20 injunction was obtained by Amy Winehouse again banning 21 your agency, Big Pictures, from following her and also 22 referring to persons unknown -- 23 A. Yes. 24 Q. -- seeking to photograph the musician outside her home 25 and in other public places. Halfway down page 2 of 4, Page 24

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1 a source close to her management team is quoted as 2 saying: 3 "The injunction was sought because press attention 4 made her life unsafe. Every time she got in the car she 5 was chased or was jostled and it has become unsafe not 6 just for her but for the people around her. We don't 7 have a problem with the press doing their job, but it 8 has been mayhem a couple of times and Amy had to do 9 something." 10 Now, again, are you familiar with that particular 11 injunction that was obtained against your company? 12 A. I'm extremely familiar and it wasn't my company, and the 13 fact of the matter was is that it was photographers 14 using the name of my company, which has happened on 15 a regular basis, because of the company's, I suppose, 16 success, that we were used. I spoke to the management 17 of Amy Winehouse at the time with regard to that and 18 I did have an apology. I also then spoke to the PR 19 people who spoke to me along the lines of this, and Amy 20 Winehouse invited us into her house as an apology to do 21 a set-up with Amy Winehouse in her house leaving, which 22 is the absolute facts about that case. It wasn't 23 a Big Pictures photographer at all. 24 Q. All right. 25 LORD JUSTICE LEVESON: Is that a problem that you have, that Page 25	1 Q. You don't know, is that the answer? 2 A. No, I would certainly have to check with the CEO, but 3 there is no doubt that photographers have been 4 disciplined within my company for actions that the 5 company does not adhere to with regard to their 6 behaviour, absolutely. 7 Q. But to the best of your knowledge, has anyone been 8 disciplined as a result of the examples that we've been 9 going through? 10 A. To the best of my knowledge, I would have to take 11 secondary advice, I'm sorry. 12 Q. Would the answer be the same if I asked you whether 13 you'd ever issued any guidance relating to this sort of 14 behaviour? 15 A. There is guidance -- of course there is guidance 16 relating to this behaviour. It would be on a regular 17 basis to anyone coming into the company. People know 18 where they stand with regard to the rules and 19 regulations and our code of practice within the company, 20 albeit I don't have it in written form in front of me, 21 but I can certainly check for you. 22 Q. But no new guidance has been issued as a result of that 23 spate of injunctions and claims? 24 A. I didn't say that. I have no idea what my CEO or 25 managing directors have said at the time along the lines Page 27
1 people pretend that they're engaged by your business? 2 A. It is a huge problem, sir. It's happened on many 3 occasions and caused us no end of grief. People either 4 from other agencies, competitive agencies, or freelance 5 photographers giving, number one, false names, and 6 saying always that they're from Big Pictures. It's -- 7 it has caused us no end of problems and also with regard 8 to relationships with celebrities that my company and 9 myself personally, as you will see that we work with 10 a tremendous amount of celebrities, and celebrities make 11 a tremendous -- a very high cut of the profits of the 12 sale of pictures. 13 MS PATRY HOSKINS: All right. You see, Mr Lyons, it might 14 be suggested by some that there's a bit of a pattern 15 here, you see. The Sienna Miller claim, the Lily Allen 16 injunction, the Amy Winehouse injunction, the Angelina 17 and Brad photos obtained in Paris, the Ulrika Jonsson 18 example we've read out from your book. These are all 19 examples over a two-year period, Mr Lyons. Can you tell 20 us whether anyone, any photographer, either freelance or 21 employed by Big Pictures, has ever been disciplined or 22 blacklisted as a result of any of these actions taken? 23 A. With -- 24 Q. To the best of your knowledge? 25 A. Oh -- sorry? Page 26	1 of those personal incidents. I'm the company chairman, 2 I'm not in the office every day, in fact I'm in the 3 office very rarely. I've been over here for the last 4 four months filming television. At the end of the day, 5 that has been a consistent pattern over the last five 6 years with Big Pictures. I am away a lot but 7 I certainly trust my management in place to take action 8 if action is sought in that area. 9 LORD JUSTICE LEVESON: Could you let us have copies of any 10 written guidance that your company have issued over the 11 last five years? 12 A. I certainly can check with my PA as soon as I get off 13 this, certainly, sir. 14 LORD JUSTICE LEVESON: Thank you very much indeed. 15 MS PATRY HOSKINS: That was just examples of harassment or 16 claims brought where a campaign of harassment was 17 alleged. I am now going to ask you about privacy 18 briefly. Again you've been pursued through the courts 19 in privacy claims a number of times. Can I ask you -- 20 well, let's touch on the Sienna Miller case in 2009. 21 I think you wanted to talk about this before. These 22 were the photographs taken on a boat. It's right to say 23 that you had to accept that you had invaded her privacy 24 on that occasion; is that correct? 25 A. Look, at the end of the day, I think -- it is very Page 28

1 interesting what sir said just recently, he wants to get 2 a whole overview of what goes on within the industry. 3 Now, the fact of the matter is that pictures on 4 a boat in the middle of the Mediterranean have been 5 taken -- well, since Brigitte Bardot was sunning herself 6 on the beaches of San Tropez. It's only in recent years 7 that people have taken, number one, legal cases against 8 photographers in privacy situations. 9 The photographers in that particular circumstance, 10 the reason I found it very, very strange is that the 11 week that those pictures -- or around about the same 12 time, Sienna Miller was photographed by a long lens, 13 a paparazzi picture placed on Grazia magazine, and 14 strangely enough Grazia magazine didn't have any legal 15 issue because it was a very good brand for Sienna Miller 16 to be seen on the cover. But as soon as a picture is 17 taken by a freelance, which at the time freelancers all 18 around the world it was normal practice to photograph 19 celebrities in the sun and sand, and the rich and famous 20 playgrounds, all of a sudden, when photographers were 21 seen openly, and there were 300 or 400 boats around this 22 at the particular time, all of a sudden there's legal 23 action. 24 I think when it suits a celebrity at times, they 25 decide to legal, and when it doesn't suit -- sorry, when Page 29	1 in a private resort. Do you remember that? 2 A. I didn't deal with this at the particular time from 3 a legal basis. My CEO at the time did. Do I remember 4 it? Very vaguely. 5 Q. All right. Then we have the JK Rowling photographs 6 which resulted in a court judgment, tab 3, sir. 7 Photographs taken of her child in 2004. 8 A. Yes. 9 Q. Do you remember that? I don't want to go through it in 10 any detail. 11 A. I do recall it, of course I recall it. I didn't deal 12 with the particular situation at the time, but I'm very 13 happy to take questions on it. 14 Q. I simply want to understand -- 15 A. The ones I can answer I will. 16 Q. Of course. As a result -- you may again not be able to 17 answer this, but as a result of the JK Rowling case, the 18 Grant and Hurley case, the Miller case, where there were 19 invasions of privacy in each case, are you aware of any 20 disciplinary action taken or guidance given to your 21 photographers? 22 A. In the case of the JK Rowling case, certainly this was 23 the first legal situation that we had ever had, and it 24 took -- I think it was two or three years after the 25 pictures were taken, when anything actually happened Page 31
1 it doesn't suit the celebrity at the time, they decide 2 to legal, but if it's presumed that they are in a good 3 light, the celebrity necessarily won't. 4 Q. All right, that's very helpful, but can I just ask my 5 question again about Miss Miller? 6 A. Yes. 7 Q. You accepted that that case was not simply about 8 photographs on a boat; it was about photographs taken on 9 a number of occasions, including occasions where she was 10 clearly distressed, photographs of her taken when she 11 was clearly distressed. Do you remember that, Mr Lyons? 12 A. I don't know about specific pictures that relate to that 13 case unless you show them to me, no. 14 Q. All right. Can we look at some other cases? We'll move 15 on if you have no memory of that to other privacy 16 payouts, other privacy claims brought against you. 17 Tab 5, sir. 18 LORD JUSTICE LEVESON: Thank you. 19 MS PATRY HOSKINS: This is the Grant and Hurley privacy 20 payout and the article makes clear that Hugh Grant, 21 Elizabeth Hurley and her husband have accepted £58,000 22 in a legal case over photographs taken whilst they were 23 on holiday. Again you and one other agency had to pay 24 compensation as a result of an invasion of privacy over 25 the photographs which were taken while they were staying Page 30	1 with regard to privacy. Those pictures were on our 2 website -- the pictures actually were taken, from what 3 we thought, the photographer took a picture of her 4 walking down a public street in Scotland. There was no 5 problem that we felt that she had at the particular time 6 of the picture. The picture was posted in our archive, 7 which is a library, and it was downloaded several years 8 later and used by a story about famous mums' families 9 for £75. It was just a stock image that was downloaded 10 by the Sunday Express. We didn't feel, certainly at the 11 time, that there was any privacy invaded at the time. 12 It was not common knowledge in the industry that any 13 case had been brought against any picture agency. 14 Q. I've been through a number of examples with you, both in 15 relation to harassment claims and privacy claims. Does 16 it concern you that there have been so many actions 17 brought against Big Pictures in the last three or four 18 years? 19 A. Any legal action is concerning, especially where on one 20 day we're doing a set-up with Naomi Campbell through her 21 PR or management and then all of a sudden one day, the 22 next, she's sending through some kind of legal action 23 for privacy. The same as either someone like 24 Charlotte Church, the same like many celebrities, one 25 day if they're photographed in a situation that they -- Page 32

8 (Pages 29 to 32)

1 you know, it is so -- the problem with the industry as 2 we face today is photographers and picture agencies and 3 publishers really don't know where they stand. It is 4 extremely ambiguous. With regard to Lily Allen, you'll 5 photograph her on a beach one day and you'll never hear 6 because they're lovely pictures. The next day you'll 7 have a lawyer's letter through your post. So I'd like 8 to make that point. 9 And also, half the industry make a tremendous amount 10 of money working with agencies such as this, not only 11 boosting their PR around the world but also taking cash 12 for set-up photography with the paparazzi on a regular 13 basis. 14 Q. I'm going to quote one more paragraph from your book. 15 I'd be grateful if you could tell me whether you still 16 hold the same view. Page 149 you say this: 17 "All these truths about the nature of celebrity mean 18 that when Big Pictures is out there papping the stars, 19 some will claim that to an extent we're imposing on 20 their privacy and causing them some kind of distress. 21 My answer to that is simple: if you can't hack the job, 22 don't wear the hat." 23 Do you still believe that? Is that still your view? 24 A. Look, at the end of the day, being a celebrity is 25 a choice of the person. I've seen it from both sides of Page 33	1 along that picture agencies and picture -- people that 2 are recording history of celebrity don't know what is 3 right any more and what is wrong because common practice 4 up until the last five to ten years has changed 5 dramatically through people -- through kind of a back 6 door privacy law, really. 7 MS PATRY HOSKINS: I have three short questions left, 8 please, Mr Lyons. The first is the existence, whether 9 or not you have what's known as a "no shoot list". 10 Mr Morgan from Splash picture agency explained to us 11 that he has a list of people that he simply doesn't 12 touch any more, he doesn't accept photographs in respect 13 of those individuals any more, either because there's 14 been a court injunction or for other reasons. 15 A. Yes. 16 Q. Do you have a similar list -- 17 A. Yes. Yes, we do. 18 Q. How does someone make it on to that list? Is it simply 19 when there's a court injunction in place or would you 20 place someone on that list simply because you thought 21 that they'd behaved in such a way which would indicate 22 that they were private and were unlikely to want to be 23 photographed? 24 A. No, a "no shoot list" would be placed with someone that 25 would regularly -- with regard to a court situation, Page 35
1 the camera, and the fact of the matter is that if you 2 are in the public eye, you are looked up to. We live in 3 a world of voyeurism. It is a business where young 4 people look up to. I think you're in a situation where 5 celebrities feel if it's on their terms, it's fine, and 6 if they've done the wrong thing or something immoral and 7 that's been recorded in history, as in a photograph, and 8 they don't like it, all of a sudden -- I get apologies 9 from celebrities along the lines in these situations. 10 So the trouble is there is no direct -- you don't 11 know whether you're photographing someone famous these 12 days, whether it be right or whether it be wrong, 13 because the fact of the matter is it's totally 14 ambiguous. 50 per cent of celebrities want to be 15 photographed and they love it for their own self gain in 16 terms of financial back pocket, and to make them more 17 famous, and others will pick and choose the times when 18 they're promoting their record or their television show 19 or their movie to be photographed, and, you know, we 20 have people from all sorts of Hollywood stars ring us 21 up, from Mariah Carey's PR as soon as she hits town, 22 Paris Hilton's PR and management ring us up as soon as 23 they hit town saying she's staying there, she's going 24 there. They want the publicity. 25 It's an ambiguous situation that I have said all Page 34	1 a legal situation. Absolutely. I mean, it's no good 2 trying to give publicity or someone courting publicity 3 if they're going to turn around the next day -- I mean, 4 not even at a photo call would we even enter into 5 a situation with someone that is not sure whether they 6 want the publicity. It's not worth running the risk. 7 It's a purely commercial decision. 8 Q. All right. Mr Morgan was asked whether he would provide 9 a copy of his "no shoot list". Sir, would you like a -- 10 LORD JUSTICE LEVESON: Yes, I'm quite interested in this and 11 I'm very interested in what you said about photographers 12 not knowing where they stand. 13 First of all, Mr Lyons, I wonder whether you would 14 be prepared, confidentially, I wouldn't necessarily 15 publish it if you didn't want me to, to provide us with 16 a copy of your "no shoot list". 17 A. Yeah, absolutely, sir. 18 LORD JUSTICE LEVESON: Thank you. And the second thing is: 19 do you think photographers would value some other 20 guidance to make it rather clearer where everybody 21 stood? 22 A. Oh, look, I've been campaigning for this for some time 23 throughout the media, sir. Yes, absolutely, because 24 I also think that photography -- and historically we 25 live in a world of celebrity and several celebrities Page 36

1 need it and want it, and very few certainly don't want 2 it. So you don't know from one day to the other whether 3 they're going to want it that day or they wake up the 4 next day and say, "This is a private moment", or "Come 5 into my house and photograph me walking down the 6 street". It is so ambiguous a situation, you don't know 7 what is right and what is wrong. 8 LORD JUSTICE LEVESON: Well, if you have suggestions as to 9 what that might contain, you're perfectly at liberty to 10 submit them in writing to me and I will consider them, 11 in the context of the over-arching requirement that 12 I have to deal with the customs, practice and ethics of 13 the press. 14 A. Yeah, fine. You do understand where I'm coming from, 15 sir, that on that situation, though? 16 LORD JUSTICE LEVESON: I understand what you're saying. 17 A. Yes. 18 MS PATRY HOSKINS: Can I ask you about mrpaparazzi.com, 19 please? 20 A. Yes. 21 Q. This is your website. I'm going to again quote from 22 your book. You say: 23 "Mrpaparazzi.com is a huge priority for me. The 24 site allows the public to upload their own pictures and 25 take advantage of my skills as an agent and a salesman Page 37	1 that is saleable, yes. 2 Q. It might be said by some that encouraging members of the 3 public to snap out their phones and take a picture of 4 a celebrity encourages or may encourage invasions of 5 privacy. What steps does your agency take to ensure 6 that photographs are not taken in a way which either 7 invaded someone's privacy or harassed -- 8 A. Before the pictures -- okay. As people are uploading, 9 there is very specific terms and conditions, which you 10 will have had sent to the court by my personal 11 assistant, on -- the terms and conditions of what's on 12 the site. If we have any doubt of any picture that 13 comes in that is in any way that we would find unethical 14 or suspicious in any way, which I think on occasions has 15 happened, we have then phoned the particular supplier, 16 taken the details of what was the picture, where was it 17 taken, under what circumstances, and then made decisions 18 and made several decisions, and also the copyright 19 background of the picture, and made several decisions 20 with the team that looks over that on a regular basis on 21 the site and the sales director. 22 So that is a commonplace that it is checked. 23 Q. All right. Mr Lyons, is there anything that you wish to 24 add? Those are all my questions for you. 25 A. Oh, I'd just like to go into the smaller deal, and I can Page 39
1 to make them top dollar and avoid them getting ripped 2 off. The potential is there for mrpaparazzi.com to be 3 a much better business than Big Pictures. It is the 4 future and I'm putting a lot of thought and money into 5 it, although the business is self-funding, as was Big 6 when I started it." 7 So that's obviously considered to be a key part of 8 your business? 9 A. Look, mrpaparazzi.com is a new media celeb -- could you 10 hear? 11 Q. Yes, I can hear you. 12 A. Yeah, it is a celebrity breaking news site at the 13 foremost. It is like any another online celebrity 14 publisher, but yes, with regard to whether it be the BBC 15 or whether it be News International or whether it be 16 Associated Newspapers, everyone has affinity [sic]. We 17 have a brand where we are an agent to the public for 18 pictures, whether it be a news picture, an animal 19 picture, a celebrity picture, any picture that's 20 saleable around the world, whereas most other media 21 companies say, "Send your picture in and we'll publish 22 them", whether it be a big news story on Sky News or the 23 BBC. We act as an agent for the public, for instance if 24 you're in the right place at the right time, you're in 25 the right place at the right time and you get a picture Page 38	1 make a written submission to sir on the situation, but 2 I think I want to make it quite clear that, you know, 3 what we touched on earlier about one day a celebrity 4 will want their privacy and then the next day it will be 5 up for sale is a great worry within the industry, and 6 many names that have appeared, from what I can gather, 7 before you have been in situations where they regularly 8 will take money from either a photographer or an agent 9 around the world if they feel they're in a money-making 10 situation but also a situation to use the paparazzi as 11 a huge PR tool. 12 You know, paparazzi in America is regularly used by 13 management and it's regularly used by publicity agents 14 to boost someone's profile, and I think that where we 15 are here in the United Kingdom it is all over the 16 place in terms of what can we do, what can't we do? Can 17 someone have their day one day and all of a sudden get 18 a legal letter the next day, which I think is totally 19 wrong. 20 I also think that celebrities use these situations 21 for their own self gain on a regular basis, and I think 22 that there's two sides to every story, which I hope this 23 Inquiry looks at in great detail. 24 MS PATRY HOSKINS: Thank you. 25 Sir, unless you had any questions? Page 40

10 (Pages 37 to 40)

1 LORD JUSTICE LEVESON: I have one question. I appreciate 2 the terms and conditions on your website will allow you 3 to filter out photographs that you believe offend the 4 code or your -- 5 A. Yes. 6 LORD JUSTICE LEVESON: -- view of code. But is there 7 anything on the website which explains to would-be 8 photographers what they can and can't do or should and 9 shouldn't do? 10 A. Yes, absolutely there is. There's a page on what they 11 should and shouldn't do, sir, on the site. 12 LORD JUSTICE LEVESON: Thank you. Thank you very much 13 indeed and thank you for making yourself available in 14 the evening to give evidence to me in the morning. 15 Thank you very much. 16 A. Thank you. 17 MS PATRY HOSKINS: Sir, I understand that we need a couple 18 of minutes simply to ensure that the video-link is 19 switched off and that the feed is switched back to -- 20 some technical explanation I don't really understand. 21 LORD JUSTICE LEVESON: We'll have a couple of minutes. 22 MS PATRY HOSKINS: I also need to before you rise ask that 23 you read in two statements, if I can. 24 LORD JUSTICE LEVESON: Yes. 25 MS PATRY HOSKINS: The first is the second statement of Page 41	1 "I believe the facts in this witness statement are 2 true." 3 And room for you to sign and date it. Are you 4 prepared to sign and date this statement so that it's 5 formally your evidence to this Inquiry? 6 A. Absolutely, yes. 7 Q. Thank you very much. We'll ask you to do that once 8 you've completed your evidence. 9 Before we deal with the matters which are 10 specifically the subject matter of your statement, could 11 we deal briefly with your career in newspapers? 12 A. Yes. 13 Q. Starting in regional newspapers, then moving to the 14 News of the World first in 1995, but could you take it 15 on from there, please? 16 A. Sorry, from 1995? 17 Q. Please. 18 A. 1995 I joined the News of the World, eventually became 19 staff, as a staff reporter. I left around 2000 to join 20 the People as number three on the news desk, then became 21 number two, then number one, and about 2004, November 22 2004, I returned to the News of the World as number two 23 on the news desk and then a year later I became head of 24 news, news editor, so that would be about November 2005. 25 Q. Thank you very much. Page 43
1 Mark Thomson, which was received by the Inquiry at the 2 end of last week, and the statement of Patricia Owens. 3 Can they be formally read into the Inquiry? 4 LORD JUSTICE LEVESON: Certainly. 5 Before I rise, I'll just deal with a matter that 6 Mr White's solicitors raised. You are, of course, 7 correct. It is an error that you were not excluded from 8 the fact that you were in the list of those who appeared 9 before the Administrative Court and the ruling will be 10 amended accordingly. 11 MR WHITE: Thank you very much. 12 (10.34 am) 13 (A short break) 14 (10.38 am) 15 MR JAY: The next witness is Mr Ian Edmondson, please. 16 LORD JUSTICE LEVESON: Thank you. 17 MR IAN WILLIAM EDMONDSON (sworn) 18 Questions by MR JAY 19 MR JAY: First of all, Mr Edmondson, your full name, please, 20 for the Inquiry. 21 A. Ian William Edmondson. 22 Q. Thank you. You provided a witness statement to the 23 Inquiry which is currently in draft. It bears the 24 number 60267. It's under your tab 1. There's 25 a statement of truth: Page 42	1 A. Thank you. 2 Q. And you left in 2011; is that right? 3 A. Yes. 4 Q. The first matter which we ask you to address was the 5 question of the emails, paragraphs 81 to 83 of the 6 judgment of Mr Justice Eady. We can turn up those 7 paragraphs of the judgment. It's under tab 10 in our 8 bundle. I'm afraid this version isn't paginated. If 9 you could find, please, paragraph 81, you'll see that 10 these are the emails that Mr Thurlbeck sent to Woman A 11 and Woman B on 2 April, which was between the two 12 stories in the News of the World. The first story was 13 on 30 March 2008 and the second story on 6 April 2008. 14 In order that we understand the background to this, 15 were you involved with the publication of the first 16 story on 30 March? 17 A. I wasn't, no. I was on holiday that week. 18 Q. Thank you. So you come back from holiday. 19 Mr Thurlbeck's evidence to the Inquiry -- this is under 20 tab 12 at page 92, which is the transcript of his 21 evidence -- he said first of all at line 10, page 92 -- 22 the question was: 23 "Can I understand, please, what your evidence to 24 this Inquiry is about these emails? Is it your evidence 25 that you didn't draft the emails? Page 44

1 "Answer: That's true, yes. 2 "Question: Who did?" 3 Then you can see the answer: 4 "The -- it was somebody on the news desk who had 5 been on holiday when the part one story was broken." 6 He didn't give the name at that point. Line 23: 7 "So it's true to say that those emails were dictated 8 to me." 9 And then later on at page 93, he was pressed to give 10 the identity of the person on the news desk. At line 17 11 the question was: 12 "You see, you could always ask him or require him to 13 give evidence. Do you understand, Mr Thurlbeck, where 14 this might be leading?" 15 "Answer: All right, it was the news editor, who at 16 the time was Mr Edmondson." 17 Slightly later on after lunch, page 1 of the 18 afternoon transcript, when he was asked at line 8 19 a specific question about a particular sentence in the 20 email, the question was: 21 "That's not your language, is it, rather 22 Mr Edmondson's?" 23 "Answer: I can't remember. I can't remember now 24 this particular phrase." 25 So that, as it were, frames the issue. Page 45	1 a culture of trying to persuade -- let me just put it 2 neutrally -- somebody to say something when they don't 3 want to, which is relevant to the terms of my Inquiry. 4 I'm not trying to revisit Mr Justice Eady's statement. 5 A. Sure. 6 LORD JUSTICE LEVESON: He's done it and the damages have 7 been paid and that's the end of that, but I am very keen 8 to understand what's going on here. 9 A. Mm-hm. 10 LORD JUSTICE LEVESON: So I'm sure you will appreciate that 11 it's not just this particular email; it's the thinking 12 behind the email -- 13 A. Sure. 14 LORD JUSTICE LEVESON: -- which might legitimately not 15 unfairly be described as blackmail, without -- using 16 that term in a non-technical way, which I'm trying to 17 get at. 18 A. Okay. 19 LORD JUSTICE LEVESON: That's the reason for the questions, 20 not because I'm revisiting this litigation. 21 A. I totally understand, sir. I can't specifically 22 remember the email, but I can happily talk through what 23 would have happened that week. I mean, there is no 24 doubt that Neville would have been trying -- or any 25 number of reporters would have been trying to get hold Page 47
1 A. Mm-hm. 2 Q. What is your evidence, Mr Edmondson, about who drafted 3 these emails? 4 A. I don't recall these emails being sent at all, so as for 5 who drafted them, I wasn't in the habit of drafting 6 emails, or I think he uses the word "dictating" emails, 7 so that's what concerns me about this. 8 Q. Right. Is it your evidence that you did not draft these 9 emails or is it your evidence that you can't remember 10 whether you did or did not draft the emails? 11 A. I can't remember at all. I can't remember if -- 12 anything about these emails being sent. The usual 13 process of trying to contact someone would be telephone, 14 knock on their door. An email would be some way down 15 the line, so no, so I can't remember having any 16 involvement with the emails. 17 Q. So might you have drafted these emails? 18 A. No. Not at all. It wouldn't be something -- I mean, 19 I look at the language that you refer to here where it 20 says: 21 "Please take a breath before you get angry with me." 22 It just doesn't seem to be my type of language that 23 I would use. 24 LORD JUSTICE LEVESON: You understand the point, I'm sure, 25 Mr Edmondson. These are emails which may reflect Page 46	1 of the women, but as for how he did it, that would have 2 been such a small part of that week. 3 MR JAY: Certainly. But I think the question is more 4 directed as to whether you had any involvement in how he 5 did it, in particular whether you, for example, might 6 have asked him to contact the women? 7 A. I've got no doubt whatsoever that I would have asked him 8 to contact the women. In fact, with Neville's 9 experience, I probably wouldn't have even needed to ask 10 him, it would have been so second nature. 11 Q. Were you senior to him? 12 A. Yes. 13 Q. So it's possible you asked him; on the other hand, it's 14 possible he did it on his own initiative, is that fair? 15 A. It's more likely that I would have asked him. 16 Q. Okay. Is it possible that you would have given him some 17 instruction as to what to say to the women in general 18 terms? 19 A. Someone of his seniority, very, very unlikely. 20 Q. Because the gist of the emails was an invitation -- to 21 put it very neutrally, perhaps too modestly -- to the 22 women to give their story, but if they didn't, then it 23 was open season, the photographs would be or might be 24 published. 25 A. Yes. Page 48

1 Q. Was that something you might have been involved in? 2 A. The mechanics of what we were doing that week, 3 absolutely, I would be, yes. 4 Q. To be clear, the offer that was being put to the women, 5 namely "Come forward, give us your story and you'll be 6 anonymous, on the one hand, but if you don't co-operate, 7 we, the News of the World, will do what we like with the 8 photographs on the other hand", was that sort of choice 9 something which you would have been involved with in 10 putting to the women? 11 A. No. Very unlikely. Very, very unlikely. 12 Q. Why do you say that, Mr Edmondson? 13 A. Well, for a number of reasons. That is not the sort of 14 language I would have used. Ultimately, it wouldn't be 15 my responsibility or decision what we do in the 16 newspaper. So for me to say, as a news editor, or even 17 to take it, for example, Neville Thurlbeck as the chief 18 reporter, it's not his decision to make those 19 statements. What happens in the newspaper is down to 20 the editor. That week it was the deputy editor, because 21 the editor was on holiday, so even though from memory 22 the editor was on holiday and editing from holiday, 23 but -- so these sort of decisions aren't made by a news 24 editor or head of news or chief reporter or senior 25 reporter. Page 49	1 the general message, in other words, to the women: "You 2 co-operate with us, we'll pay you some money and you'll 3 be anonymous; you don't co-operate and your photographs 4 will be splashed on the newspaper" -- was that a message 5 which you think you might have contributed to? In other 6 words, encouraged Mr Thurlbeck to get across to the 7 women? 8 A. The latter part, no. 9 LORD JUSTICE LEVESON: Let me just make it abundantly clear, 10 because I'm very keen to understand this. The women 11 wouldn't know who was responsible for what goes in the 12 newspaper? 13 A. That's right. 14 LORD JUSTICE LEVESON: The women would only respond to the 15 communications that they received. What is your 16 evidence about the propriety of this type of email? 17 A. I don't like its tone. 18 LORD JUSTICE LEVESON: Would you ever have allied yourself 19 with this type of approach to any witness in any 20 circumstances? 21 A. No. 22 LORD JUSTICE LEVESON: So there is no question of your 23 recalling or not recalling, because it doesn't really 24 matter. 25 A. That's right. Page 51
1 Q. I think there are only two possibilities here, 2 logically. Either Mr Thurlbeck made the decision on his 3 own initiative to contact the women and to express 4 himself in a particular way, or you did. I don't think 5 anybody's saying that the editor had some -- or the 6 deputy editor had some role in this. Do you understand 7 that? 8 A. I do understand, yes. 9 Q. All I'm trying to ascertain is whether it's possible -- 10 regardless of the terminology used, whether the general 11 message which was sought to be got across to the women, 12 that that was a message which you were involved in, in 13 the sense of part conceiving. Do you understand that? 14 A. Yeah, I do. 15 Q. Might you have been? 16 A. Yes, I might have. 17 Q. You might have been? 18 A. Well, I can't remember, but you're trying to say would 19 I have been part of the process to ask the women to give 20 us an interview? Yes, absolutely. But the terminology 21 that you are using, no. 22 Q. Well, what about the -- putting aside the terminology, 23 which might well have been Mr Thurlbeck's -- 24 A. Sure. 25 Q. -- but obviously no view about that is being expressed, Page 50	1 LORD JUSTICE LEVESON: Because if you'd never ever do it, it 2 can't possibly be you. 3 A. Quite. 4 MR JAY: Thank you. We heard from Mr Myler that there was 5 no come-back on Mr Thurlbeck after the litigation, was 6 there? 7 A. To the best of my knowledge. 8 Q. Can I move on now to the topic of Mr Webb. 9 A. Yeah. 10 LORD JUSTICE LEVESON: Before do you that, does that 11 surprise you? 12 A. Yes, it does, yes. Yes. If the -- upon reflection, 13 after the case with Mr Eady and Mosley, then yes. 14 I would have expected -- and I can't remember the first 15 time I saw these emails, from memory I don't even think 16 I saw them some time after the Mosley case, so you would 17 have expected that, yeah. 18 LORD JUSTICE LEVESON: Did you give evidence in this -- 19 A. I didn't, no. 20 LORD JUSTICE LEVESON: I mean, as you read the emails now, 21 what's your reaction to them? 22 A. I think they're a threat. 23 LORD JUSTICE LEVESON: I think we can probably agree about 24 that. 25 MR JAY: Mr Webb now. This is paragraph 3 of your statement Page 52

13 (Pages 49 to 52)

1 at our page 60268, where you say you instructed Mr Webb 2 to carry out investigative work on quite a few 3 occasions. No fixed pattern. Might have sent him on 4 a job for a week or so. 5 The sort of jobs, Mr Edmondson, that he was sent on, 6 could you assist us with that? 7 A. In general terms, surveillance. 8 Q. Yes? 9 A. Watching A and B, attempting to prove stories, that 10 would include following people that we suspected of 11 being involved in a particular story. Can't recall 12 specifics, but in general terms, that's what he would 13 do. 14 Q. Mr Webb's evidence on this issue, under your tab 16, 15 it's his witness statement, page 51511. Paragraph 12: 16 "The journalist tasking me with an assignment would 17 normally only say something to the effect that there had 18 been a tip, or a source has said, or the news desk has 19 information that certain parties are having an affair, 20 and typically the instructions which followed would be 21 to keep one of the parties under surveillance to 22 establish whether there was any truth in the 23 information." 24 Is that correct, Mr Edmondson? 25 A. It is. Page 53	1 A. Cuttings. There's been a number of examples of false 2 public image, so if someone was projecting themselves in 3 media as wholesome, faithful, would never cheat on their 4 wife, and then doing something else in private, then 5 yes, I would imagine that we would proceed on that. 6 There's been a number of occasions post Mosley where we 7 looked specifically at people like that. Not as in 8 pre-tip, but once we had the tip, we would judge the 9 subject matter on what they have said in the past and 10 how they'd behaved. I can think of a number of 11 examples. 12 Q. Can you apply a different approach to politicians on the 13 one hand and celebrity on the other? 14 A. No. 15 Q. Or was the approach reasonably the same? 16 A. It was reasonably the same. I can't think of a major 17 difference. Politicians, you would often look in their 18 election brochures where they would talk about the 19 family values and how much they put into that, so that 20 would be one contributing factor. 21 Q. Of course, in relation to celebrities, there's no such 22 analogous brochure, is there? 23 A. No -- 24 Q. What are you looking for -- 25 A. There are analogous brochures. There's interviews in Page 55
1 Q. Insofar as it relates to the news desk? 2 A. It is, yes. 3 Q. So was it usually then to ascertain whether certain 4 parties were having an affair? 5 A. That could be one of the things, yes. 6 Q. I think the question was: was it usually because one of 7 the parties or both parties were having an affair? 8 A. I can't remember if that was the majority, but that 9 would certainly be one of the things. He would also 10 look at drug dealers, a number of criminal issues. It 11 probably would be fair to say affairs would be the 12 majority. I don't know what the numbers would be. 13 Q. In relation to drug dealers and criminal issues, you 14 would say there's a clear public interest -- 15 A. Of course. 16 Q. -- in pursuing that. Let's for the purposes of argument 17 agree with that. 18 A. Yes. 19 Q. But in relation to ascertaining whether certain parties 20 are having an affair, what was the public interest in 21 exploring that issue? 22 A. Well, it was a case-by-case basis, so depending on who 23 the subject matter was, we would decide yes, we're going 24 to pursue this story, or no we're not. 25 Q. What factors would be taken into account? Page 54	1 glossy magazines, TV, inviting cameras into their home, 2 parading their children, pictures with their wife. In 3 one particular case, which I don't particularly want to 4 go into, to name, talking about their wife in great 5 detail, that they would never do such a thing, and then 6 to find something that they are actually doing, that 7 would form a public interest. 8 Q. I can see in that last example there may be an argument 9 if celebrity A makes a particular express statement and 10 then it's contradicted by his or her behaviour. 11 A. Yeah. 12 Q. But in the other cases you've given, is there an express 13 statement or is there just an implied statement in your 14 view? 15 A. Post Mosley, you had to be very, very careful on who you 16 looked at, so. 17 Q. Pre-Mosley then? 18 A. Pre-Mosley we looked at things, but I don't think as 19 carefully as we did post Mosley. 20 Q. Was Mr Webb in your view a journalist or was he 21 a private detective? 22 A. He carried out journalistic roles for me, but you could 23 argue both ways. 24 LORD JUSTICE LEVESON: Well, he wasn't a journalist, was he? 25 A. Well, he was, because he carried out journalistic tasks. Page 56

1 Pre-Derek Webb, and this is something I don't think 2 that's come across so far, we would use reporters and 3 photographers to carry out surveillance. Particularly 4 at the News of the World where a lot of our stories were 5 looking at people, using sources. Journalists and 6 photographers weren't particularly good at doing that, 7 and Derek Webb was trained, he was, I think from memory, 8 25 years with the police, and he was trained in 9 surveillance, so his skills were very useful. 10 So that was one thing that a journalist would be 11 expected to do at the paper. So he was carrying out 12 a role that would have been given to a reporter or 13 a photographer, or in certain cases both. 14 MR JAY: I'll come back to that issue but what I'd like to 15 do is approach the issue in this way, first of all by 16 inviting your attention to Mr Webb's evidence, which is 17 under tab 18 in the bundle you have in front of you at 18 page 119. 19 In order that we can frame this in terms of the 20 chronology, Mr Webb left the News of the World for about 21 18 months in 2007, but he returned in 2009, after 22 certain matters were resolved. Line 5, page 119 -- so 23 we're in 2009: 24 "Question: Who made the approach this time, you or 25 them? Page 57	1 "Answer: Yes. Thirdly, I had to change my email 2 address. 3 "Question: Right. Which was at the time? 4 "Answer: I'd changed it from Silent Shadow Services 5 to Shadow Watch. " 6 Do you see all of that? 7 A. I do. 8 Q. There was evidence from I think it was Mr Myler that 9 private detectives or the use of private detectives was 10 banned at the News of the World in 2007. Now, did you 11 know that last fact? 12 A. Yes, I was aware of that. 13 LORD JUSTICE LEVESON: Is it changed to Derek Webb Media? 14 Changed from Shadow Watch to Derek Webb Media? 15 A. Yes. 16 MR JAY: The bit of a hiccup which is referred to here, did 17 you know about this hiccup? 18 A. I don't really know what you mean by a hiccup. This is 19 not my evidence that I've given. 20 Q. No, sorry, it's Mr Webb. It's at line 14 at page 119. 21 A. Yeah. 22 Q. "There's been a bit of a hiccup." 23 What Mr Webb is effectively saying is we have to 24 change nominally, at least, your title from private 25 investigator to journalist. Page 59
1 "Answer: I phoned up [so Mr Webb phoned up]. 2 I phoned up Neville Thurlbeck and told him the result of 3 what had taken place but I wanted some time out until 4 Christmas and that was it, and he told me to contact him 5 early in the new year. 6 "Question: So I presume you did contact him? 7 "Answer: I contacted him in the early part of the 8 new year, I think it was either first or second week in 9 January of that -- 2009, and he told me that there's 10 been a little bit of a hiccup, we need you to actually 11 terminate your private investigator's licence and that 12 the bosses require you to get -- join the NUJ. 13 "Question: Right. So two things. You had to 14 relinquish your licence? 15 "Answer: In fact, can I just say that -- I say 16 'relinquish my licence'. I'd actually let it drop 17 throughout -- when I was -- the previous year when I was 18 actually on bail. So it had actually dropped from the 19 system anyway. 20 "Question: But did Mr Thurlbeck know that? 21 "Answer: No." 22 Reading page 120, line 4: 23 "Question: Okay, I'll tell you the two and then you 24 can tell me the third. Secondly, had you to get an NUJ 25 card. And thirdly? Page 58	1 A. Oh, I see. 2 Q. We're going to give you an NUJ card but in reality 3 you're doing exactly the same thing and we're going to 4 pretend now that you aren't what you really are, and 5 we're going to call you Derek Webb Media. Did you know 6 all of this, Mr Edmondson? 7 A. I didn't know he had a private investigator's licence. 8 I didn't know that you had to have a private 9 investigator's licence, so that's news to me. I do 10 remember having conversations with the editor and 11 I think the managing editor about asking him to join the 12 NUJ, yes. 13 Q. Did you understand that the reason for him joining the 14 NUJ was in effect to enable News of the World to employ 15 him, because they couldn't employ him on the basis that 16 he was a private detective? 17 A. Yes, that's right. 18 Q. So everybody would pretend that he wasn't a private 19 detective but a journalist; did you know that part of 20 it? 21 A. I don't think he was pretending to be a journalist, but 22 I get your point. 23 Q. But you must have known, therefore, from the evidence 24 you've just given, that this was all just a sham, wasn't 25 it? Page 60

15 (Pages 57 to 60)

1 A. I think it was, yes. 2 Q. Because you said in your statement in relation to what 3 journalists do -- this is at the bottom of page 60268, 4 the last paragraph there: 5 "If the newspaper wanted to conduct surveillance, it 6 would generally use a reporter and/or photographer." 7 Then you say: 8 "Reporters and photographers are not trained in 9 surveillance ..." 10 That's true, isn't it? 11 A. It is true, yes. 12 Q. "... and so are sometimes unable to remain unobserved by 13 the subject. In those circumstances, Mr Webb was a more 14 suitable person to use." 15 The reason being that he was trained in surveillance 16 and he was really a private detective. All that's 17 correct, isn't it? 18 A. It is correct. 19 Q. Was Mr Myler aware of this pretence, really? 20 A. Yes. 21 Q. And Mr Crone? 22 A. Yes to the best of my knowledge, shall I say. 23 I certainly know that Mr Myler and the managing editor, 24 who I believe was Stuart Kuttner, was aware. I think 25 Mr Crone was aware because he was aware of Mr Webb's Page 61	1 that it was unlikely material for inclusion in the 2 newspaper as a story, but told me that the main reason 3 to investigate was a that it could provide the newspaper 4 with good leverage against the two individuals." 5 A. Correct. 6 Q. And that was your concern, presumably? 7 A. Yes. 8 Q. I suppose your concern as well was who was going to pay 9 for this, was it going to come out of your budget or 10 come out of the legal department's budget? 11 A. Yeah, there was a great debate at the time of where 12 budgets were coming from, because I think the division 13 from news to pictures, features, politics, et cetera, 14 had been split up and we were under great pressure to 15 keep within budget, so I made the point to Tom to say, 16 "I hope you're paying for this". 17 Q. Thank you. 18 A. I can't remember who paid for it in the end. 19 Q. The McCann diary story. May I start by reminding us all 20 of Mr Myler's version -- or rather, his evidence, pardon 21 me. Tab 8, page 89. This is part of the transcript of 22 his evidence given on 14 December last year. 23 Particularly at line 20, I think, but we can skim read 24 a little bit earlier on, but can I just try and get to 25 the heart of this. The question was: Page 63
1 employment. Because during that absenteeism of 18 2 months, he was liaising with Mr Webb's lawyer. 3 Q. Thank you. May I ask you now about the 4 Ms Harris/Mr Lewis surveillance which I think you were 5 uncomfortable about, is that right? 6 A. It is fair. 7 Q. Why was that? 8 A. I didn't see it as a story for the newspaper. 9 Q. Because? 10 A. It wouldn't have got in the newspaper. 11 Q. No. I mean the real reason for the surveillance, as you 12 yourself say in the statement at 60270, level with the 13 lower hole punch -- 14 A. Sorry, where are we? 15 Q. 60270. I hope that's what I said earlier, rather than 16 some different page number. Level with the lower hole 17 punch, the paragraph or just above it: 18 "My response to Mr Crone ...", are you with me? 19 A. Yes, I'm with you now. 20 Q. "... was to express very considerable surprise and to 21 say that I could not begin to see why the newspaper 22 would want to run such a story." 23 You've just told us that. 24 A. Yeah. 25 Q. "Tom Crone's response was that he accepted that, namely Page 62	1 "... but did Mr Edmondson make it clear to you that 2 he had made it clear to Mr Mitchell that he had the 3 whole diary and was going to cause extracts from it to 4 be published in the News of the World? 5 "Answer: That's what he led me to believe, yes. 6 "Question: Because reading the transcript, and this 7 is something which you didn't, of course, see at the 8 time, the transcript of the conversation ..." 9 And then we identified the transcript. 10 A. Mm-hm. 11 Q. Or maybe it's not necessary to go on, because we're then 12 trying to interpret the transcript, about which you give 13 clear evidence. But the gist of it is the bit I read 14 out between lines 20 and 24. Can I seek to deal with 15 your evidence carefully in this way: first of all, you 16 make it clear that your only conversation with 17 Mr Mitchell was on Friday, 12 September 2008; is that 18 right? 19 A. That is right. 20 Q. Recording the conversation, what is your evidence in 21 relation to that? I think you say it's standard 22 practice? 23 A. Yes, it was. 24 Q. Were you given an instruction to do so on this occasion? 25 A. I was, yes. Page 64

16 (Pages 61 to 64)

1 Q. By? 2 A. Colin Myler. 3 Q. Do you know why you were given that instruction? 4 A. Reinforcing "please tape it" and it was standard 5 practice to tape those types of phone calls and I might 6 even say that to a reporter, even though it would be 7 standard, but you would reinforce it. 8 Q. But was it standard practice to make it clear to your 9 interlocutor that the call was being recorded? 10 A. No. 11 Q. And why not? 12 A. You wouldn't get, in general terms, a true conversation. 13 Q. Because? 14 A. They would play to the camera. 15 Q. Right. Do you feel that it's entirely a frank and 16 honest procedure to conduct an interview with someone 17 but not make it clear that it's being recorded? 18 A. Yes, I do. 19 Q. Because? 20 A. Accuracy. 21 Q. Obviously it gives you concrete evidence subject to 22 interpreting what's being said, one understands that, 23 but is there not an element of deception -- or maybe 24 I can put it slightly lower than that, because that, 25 I think, is a slightly sort of sinister tone, but at Page 65	1 a copy of Dr Kate McCann's personal diary from a source 2 who had obtained it from the Portuguese police and that 3 the paper intended to write a story based on that diary 4 quoting verbatim from it? If so, please identify with 5 reference to the transcript of your conversation where 6 you made it clear." 7 And then your answer, please, Mr Edmondson? 8 A. I didn't make it clear. 9 Q. And you say because you were given express instructions 10 by Mr Myler? 11 A. Correct. 12 Q. When did he give you those instructions? Can you 13 recall? 14 A. From memory, at a meeting on Thursday of that week. 15 Q. Why did he give you those instructions? 16 A. I attended a meeting with Mr Myler and Tom Crone where 17 we discussed this story. I think we got the story to a 18 point where I was prepared to present it to Tom and 19 Colin, the editor. Colin gave -- sorry, I beg your 20 pardon, Tom gave his legal view, which I'm told I'm not 21 allowed to repeat, but which dismayed, shall I say, 22 Mr Myler. So he decided to ask me to make a call to 23 Mr Mitchell, not make it clear what we had, tell him in 24 general terms, basically make it very woolly. I think 25 someone previously used the word "ambiguous", and that Page 67
1 least an element of misleading the person you're 2 speaking to that you are recording them and therefore it 3 might be used against them? 4 A. I think that's fair. 5 Q. But your feeling is, well, if you did make it clear that 6 it was being recorded, then they would do what? 7 A. I would imagine freeze up, not talk to you freely, not 8 talk to you honestly. They might not want to talk to 9 you at all. A number of things. 10 Q. I can see that they might not want to talk to you at 11 all, but you think if we did make it clear to them that 12 they were being taped, there would be more incentive to 13 be dishonest during the course of the interview? 14 A. I would say that's fair, yes. 15 Q. Have there been occasions when you've had conversations 16 with people which haven't been recorded? 17 A. I'm sure there has been, but certainly not on a call 18 that is paramount to a story, and something that might 19 be used later on as evidence. 20 Q. The third question which was put to you in a written 21 notice, which we see at the bottom of page 60272, the 22 question was this: 23 "During the course of that conversation [of course 24 the conversation with Mr Mitchell] did you make it clear 25 to Mr Mitchell that the News of the World had obtained Page 66	1 is absolutely spot on what he wanted. 2 Q. So the preferred outcome for the end point of the 3 conversation with Mr Mitchell would be what? 4 A. To give him the impression that we were running a story, 5 but not tell him specifically what story, certainly 6 don't tell him that we were in possession of the 7 complete diaries, as we understood. There had been 8 extracts in the diaries -- of the diaries in Portuguese 9 papers which had been translated into the English 10 papers, but certainly not to the extent that we had. He 11 was frightened that if Clarence knew what we had, he 12 might take action. 13 Q. Well, he would do -- was the fear that he would, at the 14 very least, tell his clients, the McCanns, what was 15 going on? 16 A. Correct. 17 Q. And they would certainly get back to Mr Myler by phone? 18 A. Correct. 19 Q. Or make an application for an injunction to stop the 20 News of the World publishing? Is that what it amount 21 to? 22 A. That's exactly what it would. 23 Q. What was the purpose, though, of having an ambiguous or 24 woolly conversation, as you've described? What was the 25 intention? That you would have Mr Mitchell's part Page 68

17 (Pages 65 to 68)

1 assent? Could you put it in your own words? 2 A. Yeah, it would be in order to blame Clarence Mitchell 3 that he hadn't acted properly upon instructions. 4 Q. I see. And was that part of Mr Myler's thinking? 5 A. That was his thinking. 6 Q. Was it Mr Crone's thinking? 7 A. No. 8 Q. So you presumably were uneasy in carrying out these 9 instructions? 10 A. Yes. I had an alternative, which I presented to 11 Mr Myler. He was the only one to have Gerry McCann's 12 mobile number, and up until that point, he had 13 a reasonable or very good relationship with him, and 14 I thought he could argue that we could work 15 collaboratively to get the diaries in the paper, and 16 that was my suggestion. 17 Q. And what was Mr Myler's reaction to that suggestion? 18 A. "No". 19 Q. Because? 20 A. I think he believed, from memory, and I can't be sure, 21 that that wouldn't be a successful outcome. 22 Q. I understand. So you were sent out to make this call 23 and presumably in the light of the evidence you're 24 giving to us, you felt uneasy by what you were being 25 asked to do? Page 69	1 November 2004. There had been an earlier period, but 2 we're looking at the period 2004 to 2011. Did the 3 culture change on the arrival of Mr Myler? 4 A. It did, yes. I think the culture changed throughout 5 newspapers at that time for all the obvious reasons. We 6 suddenly got seminars on the PCC, whereas they weren't 7 around before. We were given legal briefings. 8 Everything appeared to become a lot more formal. 9 Q. Yes. Appeared to become a lot more formal? 10 A. Sorry, did, I beg your pardon. 11 Q. That wasn't intentional. 12 A. No, it wasn't. 13 Q. That form of words. Okay. In your own words, then, 14 I know it's difficult to identify a culture, but insofar 15 as you can, the period November 2004 to January 2007, 16 which was Mr Myler's arrival, how would you describe it 17 or define it? 18 A. In what way, sorry? 19 Q. Well, in terms of particularly ethical or unethical 20 conduct or whether there was, for example, bullying at 21 the paper. Can you touch on both those issues? 22 A. Well, I think it's a matter of record mistakes were 23 made, and I suppose we all learn from mistakes and we 24 tend to learn more from losing than winning, but that's 25 when Mr Myler turned up. He was there to perhaps Page 71
1 A. Yeah, I'd developed a very good relationship with 2 Clarence and I liked him a lot. I felt very uneasy. 3 Q. Why did you do it then? 4 A. I was told to. 5 Q. Do you feel that this was a sort of one-off, because 6 we're looking at this one example, or do you feel it's 7 part of a general sort of system or culture or practice, 8 however you want to put it, and this is just one 9 exemplification of that? 10 A. I must admit I can't remember an occasion of this ilk. 11 I'm sure there was occasions where an editor would want 12 you to effectively deceive someone, yes. 13 Q. So there were other occasions of deception, to use your 14 word, but this was a particularly egregious one, is that 15 a fair way of putting it? 16 A. I think it is, yes. 17 Q. What about other areas of dodgy or unethical conduct 18 which you feel you were being asked to, as it were, 19 participate in or execute? Were there such cases in 20 your view? 21 A. I can't recall instantly, but if you've made your point 22 to the editor and it was ignored, he then asked you to 23 do something, then you did it. 24 Q. Can I ask you, please, about issues of culture, because 25 you were at the News of the World, you've told us, from Page 70	1 correct mistakes that had been made in the past. 2 Q. Yes, but did he succeed? 3 A. Certainly. On what I believe you're referring to. 4 Q. I'll make it clear, Mr Edmondson, so that there's no 5 sort of mystery about this. 6 A. Okay. 7 Q. My questions are not directed to the issue of phone 8 hacking. 9 A. Right. 10 Q. They cannot be directed to the issue of phone hacking. 11 A. Okay. 12 Q. So put that entirely out of your mind. There are 13 various clear reasons why we simply cannot go there. 14 A. Yes. 15 Q. So we're everywhere else apart from phone hacking. Do 16 you follow me? 17 A. I do, yes. 18 Q. So my having made that clear, where are we on culture? 19 A. Culture, I would say, the sea change was post Mosley. 20 That's when we really felt a big big difference. Pre 21 that, nowhere near -- nowhere near the extent. We 22 looked at stories that much more. We -- I think people 23 have said this in the past and I will reaffirm this, for 24 every one story you would get in the paper, nine would 25 be thrown away. Page 72

18 (Pages 69 to 72)

1 Q. Thank you. What about a culture of bullying, in 2 particular before January 2007; was there one? 3 A. I think you know I have an employment tribunal claim 4 against News International. If you want me to talk 5 about that, I will do, happily, but I'm sure that will 6 cross over into that. 7 Q. It may do, but I don't think that stops the line of 8 inquiry. 9 A. Sure. 10 Q. Because there's a difference here between those matters 11 and the ongoing criminal investigation? 12 A. I'll be happy to answer. 13 Q. So -- 14 A. The answer's yes. 15 Q. First of all, where did it emanate from? If anywhere or 16 anyone? 17 A. Everything emanates from the editor. 18 Q. Okay. How did it manifest itself? 19 A. The culture? 20 Q. Yes. 21 A. From the editor. Every part of the paper is dictated 22 and controlled by the editor. 23 Q. Yes. 24 A. I think in the past you've spoken to witnesses where 25 you've asked them questions as to why they haven't done Page 73	1 what were the effects of it in terms of the overall 2 product, what was being written? Did it have an effect? 3 A. I can't say that I could distinguish between the two. 4 If there wasn't a culture, then you wouldn't see an 5 alternative product. 6 Q. I see. You might be able to unless you say Mr Myler was 7 also part of a culture of bullying. I mean, was he? 8 A. Yes. 9 Q. Right. Sir, I see your point. 10 But you worked at a paper before, the Sunday People, 11 for four years. Was there a culture of bullying there? 12 A. Nowhere near, nowhere near. There were elements of. It 13 was a considerably smaller paper and I think that was 14 a contributing factor. 15 Q. And of course when you were much more junior, you were 16 working in regional newspapers and I imagine there 17 wasn't a culture of bullying? 18 A. There wasn't a culture at all. 19 Q. So you are able to compare, to some extent, what happens 20 when there is and there isn't a culture of bullying? 21 A. Mm-hm. 22 Q. Obviously there are emotional and psychological 23 implications. 24 A. Yes. 25 Q. That goes without saying, I'm not addressing those. I'm Page 75
1 certain things and they're at a senior level. Well, you 2 don't do anything unless you are told to do something. 3 Q. But to make it clear then, the culture of bullying 4 emanated from the editor? 5 A. Yes. 6 Q. Is that what your evidence is? 7 A. Yes. 8 Q. Then the question was: how does it manifest itself? So 9 what did the editor do? 10 A. I don't really want to go into specifics. 11 Q. Okay. I understand your diffidence and maybe -- 12 A. Sorry. 13 LORD JUSTICE LEVESON: You've heard Mr Driscoll's evidence, 14 or possibly seen it. 15 A. I didn't -- I heard parts of it. 16 LORD JUSTICE LEVESON: He gives lots of examples. Does that 17 chime with your experience? 18 A. He was in a different department to me, sport. I can 19 only think of what I went through. There are probably 20 aspects of it that chime with me, yes. 21 MR JAY: I think I can ask you this question -- well, 22 I could press you further, but I can see why you're 23 diffident, Mr Edmondson, so I'm not going to. But what 24 were the effects of a culture of bullying, assuming -- 25 well, it is your evidence there was such a culture. But Page 74	1 addressing what we see in the newspaper as a result. 2 A. Mm. 3 Q. How, if at all, does it affect what we see in the 4 newspaper as a result? 5 A. I don't know how you can compare local papers to 6 national newspapers. I think that's a very unfair 7 comparison. They work at a different pace and there 8 isn't the same pressures that you're under. 9 Q. The effect of the pressures then, let's use a more 10 neutral term and strip away bullying, what do the effect 11 of the pressures have both on news gathering and on what 12 you write? Can you help us there? 13 A. Specifically, I'm not sure I understand where you're 14 going with this. 15 Q. If people are put under pressure, sometimes what they do 16 is less than optimal. I'm just giving a hypothetical 17 example. 18 A. Sure. 19 Q. A very high level of abstraction and I'm not trying to 20 put words in your mouth. 21 A. No. Totally understand, yes. 22 Q. Are you able to assist us? 23 A. I think in general terms, sir, it's a case of you will 24 do as you are told and you live in that environment. 25 Q. Does it amount to this: you do as you're told, and Page 76

1 sometimes you have to do things you are uncomfortable 2 about doing? 3 A. Yes, absolutely. 4 LORD JUSTICE LEVESON: And that's so even if you're the news 5 editor? 6 A. Yes, absolutely. 7 LORD JUSTICE LEVESON: I got into trouble for thinking that 8 seniority made a difference earlier in this Inquiry. 9 A. It's not a democracy at a newspaper. Autocratic. 10 MR JAY: Yes. Thank you very much, Mr Edmondson. 11 LORD JUSTICE LEVESON: Mr Edmondson I'd like to ask you 12 something, please. I don't want there to be any doubt 13 about it. Could you go to tab 8, it's page -- back to 14 the McCann story -- 85 to 88 in the bottom right-hand 15 corner. 16 Mr Myler is giving evidence about this all-important 17 conversation. I'm just going to read a bit of it, 18 because I want to know precisely what you're saying. 19 A. Okay. 20 LORD JUSTICE LEVESON: "Question: But you were of course 21 aware that if Dr Kate McCann had not given her consent 22 to the publication of her personal diary, she would be 23 outraged by the publication. You were aware of that, 24 weren't you?" 25 "Answer: I wouldn't have published if I'd thought Page 77	1 a transcript in here of the conversation where he 2 explains that he was trying to get me to go big with it, 3 and I think in the course of that conversation I think 4 Mr Mitchell had said that he'd vaguely remembered when 5 they had been used in part in the Portuguese press and 6 that they were obviously very selective. 7 "Question: Yes, but did Mr Edmondson make it clear 8 to you that he had made it clear to Mr Mitchell that he 9 had the whole diary and was going to cause extracts from 10 it to be published in the News of the World?" 11 "Answer: That's what he led me to believe, yes." 12 Did you lead Mr Myler to believe that you had made 13 it clear to Mr Mitchell that you had the whole diary and 14 were going to cause extracts from it to be published in 15 the News of the World? 16 A. No. 17 LORD JUSTICE LEVESON: Thank you. Thank you very much. 18 MR JAY: Sir, may we break for about ten minutes because 19 I haven't had the chance to speak to the next witness? 20 LORD JUSTICE LEVESON: Yes, it's a very convenient moment. 21 (11.30 am) 22 (A short break) 23 (11.45 am) 24 MR JAY: Sir, the next witness is Heather Mills, please. 25 LORD JUSTICE LEVESON: Thank you. Page 79
1 that she hadn't been made aware of it. 2 "Question: And Mr Edmondson was telling you that 3 he'd obtained consent on what day?" 4 "Answer: Well, it was absolutely clear from the 5 Friday to the Saturday that that assurance had been 6 given to him and given again to me." 7 At the bottom of the page: 8 "Question: Given the importance of all this, why 9 not just pick up the phone yourself and find out?" 10 "Answer: Mr Mitchell was a very experienced media 11 spokesperson, absolutely. I had no reason to believe 12 that what Mr Edmondson was telling me wasn't correct. 13 "Question: Did Mr Edmondson tell you clearly that 14 he had told Mr Mitchell that a copy of the diary had 15 been obtained via the Portuguese police, had been 16 translated by you, and that sections of that translation 17 were going to be published in the News of the World as 18 opposed to the News of the World simply using 19 publications which had already been made in Portugal to 20 base a story?" 21 "Answer: No, no, no. My understanding was that it 22 was very clear that Mr Edmondson had explained what we 23 had because I think the extracts that appeared in 24 Portugal were very minor, limited. I don't know how 25 much they used. But there was a -- I think there's Page 78	1 MS HEATHER ANNE MILLS (affirmed) 2 Questions by MR JAY 3 MR JAY: Thank you very much, Ms Mills. Make yourself 4 comfortable, please. You've given us your full name. 5 You've also provided the Inquiry very helpfully with two 6 witness statements. The first is dated 20 January of 7 this year, the second is dated 6 February, and the 8 second statement contains an exhibit, which is there for 9 background, as you've told me beforehand, and also a DVD 10 which we're going to look at in a moment. But this is 11 your formal evidence to the Inquiry; is that right? 12 A. That's correct. 13 Q. May I deal first of all, Ms Mills, with the voicemail 14 issue which is the subject matter of your first 15 statement? You give us the context and background at 16 paragraph 4 of your first statement, which is in early 17 2001 you were on holiday with your then boyfriend, Sir 18 Paul McCartney, in India. There was an earthquake in 19 Gujarat on 26 January 2001. Hearing of the plight of 20 the victims, and particularly those who had lost limbs, 21 you explained to Sir Paul McCartney that you very much 22 wanted to help. You'd previously been involved in the 23 distribution of over 27,000 limbs for amputees in former 24 Yugoslavia and you were obviously in a position to help 25 on this occasion. Page 80

1 Paragraph 6, could you help us with that, please? 2 You made contact with the then editor of Hello magazine, 3 who was Mr Phil Hall, who was previously, I believe, the 4 editor of the News of the World. When was that, 5 approximately? 6 A. It was pretty soon after I got back from Gujarat -- from 7 India, and heard the news of the Gujarat earthquake 8 disaster, and as you said, with my previous experience 9 helping new amputees psychologically and physically with 10 having the limb, I'd had a relationship with Hello! 11 magazine that every time we did a story, they would send 12 a donation to a charity about my charity work. So 13 I didn't know the editor or hadn't met him before, and 14 contacted them and they said his name was Phil Hall. So 15 I went for a meeting with him and he said that they 16 would be happy to make a donation to the chosen charity, 17 which was the Lions Club, in Gujarat, and Lions Club is 18 an internationally known charity, and he said, "In 19 return, we need some pictures on your visit and I will 20 send along a photographer called Ken Lennox", so they 21 offered a substantial figure for the charity, and 22 I started to investigate what exactly was needed, 23 medical equipment and prosthetic components, and then 24 I said to my then partner that I would be going back. 25 He wasn't happy about this, and we got into an argument, Page 81	1 A. Yes, that's correct. 2 Q. Can I ask you to look at paragraph 13 of your first 3 statement. 4 A. Yes. 5 Q. Later that day -- that's the day of you returning -- you 6 received a phone call from a former employee of the 7 Trinity Mirror Group, but what did he or she say? 8 A. He said it was -- it was a former employee that I had 9 had a number of conversations with over several years 10 prior to meeting my then boyfriend, so when he called it 11 wasn't a surprise because every time I'd done a charity 12 event, they'd promoted it positively prior to me meeting 13 my ex-husband, and he said, "Look, Heather, you know, 14 we've heard that you and Paul have had an argument and 15 I've just heard a message of him singing on the phone to 16 you asking for forgiveness", and I said, "There is no 17 way that you could know that unless you've been 18 listening to my messages", and he laughed, and I said, 19 "I promise you, if you report this story, even though 20 it's true, you've obtained the information illegally and 21 I will do something about it", and he never reported the 22 story. 23 Q. Thank you. The individual concerned we cannot name 24 because of ongoing police investigation. I'm asked to 25 make it clear, and therefore I do, that the individual, Page 83
1 and I had to leave the house, so I went to stay at 2 a friend's house in Middlesex, and turned my phone off, 3 because he kept calling all the time and it was very 4 stressful. 5 In the morning, when I woke up, there were many 6 messages, but they were all saved messages, which 7 I didn't quite understand, because normally they 8 wouldn't be, but I didn't think too much of it, 9 I thought I must have pressed a wrong button, and there 10 were about 25 messages all asking for forgiveness of 11 what had happened, which I won't go into, and that would 12 I come back. One of them said, you know, "Please 13 forgive me" and sang a little ditty on the -- of one of 14 his songs onto the voicemail. 15 Q. Yes. 16 A. So that afternoon I went back and all was forgiven. 17 Q. Can I be clear, Ms Mills. What sort of phone are we 18 talking about here? 19 A. A mobile phone, probably Vodafone. I've had a number of 20 phones since then, but usually stick with Vodafone, or 21 most recently O2. 22 Q. Did you make any recording of any of those messages? 23 A. No. No. They were deleted. Pretty much straight away. 24 Q. So in point of time, we're probably talking, is this 25 right, end of January or February 2001; is that correct? Page 82	1 a former employee of the Trinity Mirror Group, was not 2 a Daily Mirror journalist or anybody working under the 3 supervision of Mr Morgan. 4 But it's clear from paragraph 14 that no story was 5 published at that time. Can I move forward to 6 paragraph 15 of your first statement, that on 19 October 7 2006 -- so now we are several years later -- Mr Morgan 8 published in the Daily Mail an article with the headline 9 "I'm sorry, Macca, for introducing you to this monster." 10 The article chronicled Mr Morgan's claimed 11 involvement in introducing you to Paul, and no doubt 12 there are matters in this article with which you 13 strongly disagree; is that right? 14 A. Yes. First of all, on the lighter note, he never 15 introduced me to Paul. I never actually spoke to Paul 16 at the Mirror awards event. Paul left a number of 17 messages on my machine, and pursued me for three months, 18 so Mr Morgan had absolutely nothing to do with the 19 introduction. 20 Q. Thank you. There are other things no doubt in the 21 article which you could deal with, but I'm going to move 22 on to paragraph 16, to the voicemail issue. In the 23 middle of that article, he writes: 24 "Stories soon emerged that the marriage was in 25 trouble. At one stage I was played a tape of a message Page 84

21 (Pages 81 to 84)

1 Paul had left for Heather on her mobile phone." 2 Then you say you weren't aware of this article at 3 the time -- that's in 2006. 4 "I am aware from family and friends, however, that 5 Mr Morgan has over the years written many negative 6 articles about me. The first time in fact that I came 7 to be aware of this particular article relating to the 8 voicemail was in 2011." 9 A. That's correct. 10 Q. So the questions, Ms Mills, are these: did you authorise 11 Mr Morgan to access your voicemail? 12 A. Never. 13 Q. Did you authorise Mr Morgan to listen to your voicemail? 14 A. Never ever. 15 Q. And have you ever played to Mr Morgan or authorised him 16 to listen to a recording of this or any other voicemail 17 left on your messaging system? 18 A. Never. Never. 19 LORD JUSTICE LEVESON: I think we need to go one stage 20 further: have you ever done that in relation to anybody? 21 A. No. 22 MR JAY: Can I move forward in time from 2006 to 2010. This 23 is paragraph 56 of your second statement, Ms Mills. 24 A. Mm-hm. 25 Q. You were shown evidence by officers of Operation Weeting Page 85	1 the PCC and I'm going to come back to that, if I may, 2 towards the end of your evidence, but I know you would 3 like us to see a DVD, which is quite short, I've seen it 4 myself. It's less than two and a half minutes long. 5 A. Yes. 6 Q. Which deals with your relations, if that's the right way 7 of putting it, with paparazzi photographers. The DVD 8 probably speaks for itself, but is there anything you 9 want to say by way of introduction to it? 10 A. Yes. I was having a lot of harassment with my daughter 11 and my family and friends from the paparazzi, and I had 12 been assaulted by a particular paparazzi in a subway at 13 Brighton beach and I reported it to the police and they 14 said, "You really need to get constant harassment and 15 constant abuse evidence", so I said, "Well, what, I have 16 to go around with a video camera?" and they said, 17 "Whatever it takes, because we have no strength to do 18 anything. They can stand legally outside your door all 19 day if it's a public footpath". 20 So I then started to film absolutely everything and 21 I have over 65 hours of abuse, harassment videos of 22 paparazzi from all around the UK going through red 23 lights, just awful things, like driving over payments 24 when mothers are pushing prams, shouting abusive things, 25 making my daughter cry, jumping all over us, so we just Page 87
1 that proves that private voicemail messages of you and 2 your sister, Fiona, were hacked into. 3 A. Yes. 4 Q. The name of the hacker has been redacted out of your 5 statement to preserve the integrity of the police 6 investigation. Were you shown details, however, of PIN 7 and PUK numbers? 8 A. Yes. We were shown my PIN numbers, PUK numbers over 9 three different telephones over a period of five or six 10 years. 11 Q. Did any of those PUK and PIN numbers relate to the 12 Vodafone mobile phone which you were using in end of 13 January, early February 2001? 14 A. I don't remember, because they only gave us them to look 15 at and to confirm and then took it away. They wouldn't 16 leave us with the evidence. 17 Q. Speaking more widely, and it will be my last question on 18 this topic: did you have any reason for sharing 19 a voicemail message with Mr Morgan? 20 A. No, never. I can't quite believe that he would even try 21 and insinuate, a man that's written nothing but awful 22 things about me for years, would absolutely relish in 23 telling the court if I had personally played a voicemail 24 message to him. 25 Q. Thank you. The rest of your first statement deals with Page 86	1 made a very short edit, being aware that the time you 2 have is precious, but we have 60-odd hours of video 3 footage if the court ever need to see that? 4 LORD JUSTICE LEVESON: Did you say 65 hours? 5 A. 64 point something. 6 LORD JUSTICE LEVESON: I think there's a slight error in the 7 transcription but we'll pick it up. Thank you. 8 MR JAY: Just one point. Towards the start there are men 9 with cameras around a wooden fence -- 10 A. My house. 11 Q. Yes, and it looks as if they're trying to remove one of 12 the slatted pieces of wood. Have I correctly understood 13 what's going on? 14 A. Yeah, there was a slat missing in the build-up, they 15 were there for probably about five or six weeks daily 16 initially and then a piece of wood was put there to give 17 more privacy so that they couldn't see through the slat, 18 and then I sent one of my colleagues out with a camera 19 to go under cover and film what they were saying and 20 what they were doing. And that you can see at the 21 beginning of the video. 22 MR JAY: Thank you. Maybe we can play the videotape now, or 23 the DVD, rather. 24 (Pause). 25 I think there's sound. Page 88

1 A. There should be sound, but it's not coming. 2 THE TECHNICIAN: The technicians are organising the sound 3 downstairs. 4 MR JAY: Can we pause it while we wait for the sound. 5 LORD JUSTICE LEVESON: Can somebody see if we can facilitate 6 that, please? (Pause). 7 It's not just a question of turning up the volume? 8 THE TECHNICIAN: No, sir, I can't control the sound here. 9 They do it downstairs. 10 LORD JUSTICE LEVESON: I'm keen to watch this and therefore 11 I'd like them to just do a moment or so's work on the 12 equipment to make sure it works. So I'll give everybody 13 a break while they do that, rather than have everybody 14 sit here. 15 (12.02 pm) 16 (A short break) 17 (12.18 pm) 18 MR JAY: The machine is now -- 19 LORD JUSTICE LEVESON: I'm very pleased to hear it. 20 (DVD played) 21 MR JAY: Thank you. That is edited highlights of 64 hours 22 of material? 23 A. Yes, it's just quickly put together to give you an idea. 24 Q. Thank you very much indeed. Your second statement you 25 provided to the Inquiry primarily by way of background, Page 89	1 period, and it was all about accounts. The law at the 2 moment has a capping system, so it's rarely that they 3 will ever pay out what they've made in their heads from 4 the sensationalistic headlines and the photographs they 5 have then gone on to sell and circulate around the 6 world. 7 So you would get a tiny postage stamp apology, and 8 yet we had over 5,000 headlines, over the period of 12 9 years, negative. So if you went to court and sued them, 10 you may get 100, 200,000, but that was peanuts as far as 11 they were concerned for what they had made from those 12 headlines. 13 And then my personal view is that until there is 14 a disincentive for them to write so many lies and 15 untruths and abusive comments, it's going to continue, 16 and I feel that if I was an editor and I knew that I was 17 going to be embarrassed every week by front-page 18 apologies, the same size as the actual headline that was 19 written, I would make sure that the information was 20 100 per cent correct. So until those laws are created, 21 it's just going to continue that they put a postage 22 stamp apology two or three years after the lie was said, 23 in many cases that harmed our charity, and then it's too 24 late, the public believe the lies. 25 Q. Have you on occasion complained to the PCC, Ms Mills? Page 91
1 but extremely useful nonetheless. You see there being, 2 is this right, two periods, if I can so describe it: 3 1993, which was of course the date of your accident, and 4 about 1999, when press coverage was generally very 5 positive and favourable, and then 1999 onwards when it 6 was different; is that right? 7 A. Yeah, I mean you should never expect to have favourable 8 press if you're not doing something directly but it was 9 accurate pre-1999 and then it became very inaccurate and 10 very offensive and abusive post 1999, even though my 11 childhood and my life and everything had been documented 12 in a book for charity, it was hailed as "overcoming 13 adversity" and "amazing" and "charity campaigner", and 14 then the second I met my ex-husband, it became 15 "one-legged bitch" and "cow" and every awful word you 16 can think of. 17 Q. You've provided us with 69 pages of material. 18 I understand you don't wish us to go through it, but the 19 material largely speaks for itself. We see some 20 examples of apologies given by the press, although if 21 I may say so in very small print. 22 A. Yes. What I've found with the press, and one journalist 23 actually confirmed it, was that the editors believed 24 that you would go for libel, libel would always take 25 a year or two, and they had free rein on you in that Page 90	1 A. Yes, many times. 2 Q. And what is your general experience of the PCC insofar 3 as one can generalise? 4 A. Initially, I was unaware of them and always went down 5 the libel route, which took a long time, but it was so 6 costly and emotional and time-consuming and for 7 a postage stamp size apology later, after all the damage 8 had been done. We were informed about the PCC and we 9 got some apologies, but then they were postage stamp. 10 Then we investigated it more and found out that the big 11 decision-makers around it generally were editors 12 themselves who set their own code, which just seemed 13 absolutely ludicrous to me. I just couldn't even 14 believe that could exist, because why would they vote 15 against themselves? 16 Sometimes the PCC would try and be as helpful as 17 possible, and they tended to be -- I can't remember the 18 name, was it Stephen -- yeah, Stephen Abell? He tried 19 to, I think, be a mediator between stopping a libel 20 case, so when they knew you were seriously going to go 21 down the libel route, then that would push them over the 22 edge to give you an apology, but if they thought they 23 could get away with it, then there was absolutely no 24 way, even though they knew it was completely inaccurate. 25 I remember when the Sunday Mirror, after my Indian Page 92

23 (Pages 89 to 92)

1 trip, tried to say that the money hadn't gone there and 2 I'd kept the money, and the money didn't even cross my 3 palm. It went directly to the charity. And Tina Weaver 4 of the Sunday Mirror at the time called Hello! magazine, 5 Phil Hall, before the article was printed, and actually 6 said, "Is this true that the money has gone direct?" and 7 he said, "Yes, absolutely, Heather had nothing to do 8 with the finances", but she ran the story anyway, which 9 was ridiculous, because it was a good story to doubt my 10 charitable works by now of over 20 years. 11 It's one thing and another story if you want to 12 target somebody directly, but when you know that they 13 are responsible for hundreds and thousands of people's 14 lives and you are directly damaging those lives, then 15 I think that's criminal. 16 Q. I know you have some ideas for future regulation. 17 You've shared one of them with us, that relates to 18 front-page apologies, but are there any other ideas you 19 wish to put in front of us for consideration? 20 A. Yeah. I have just some pointers to remind me. I think 21 on the short-term solution, as I said, to disincentivise 22 them and have huge penalties, not these small amounts 23 that really don't make any difference to large 24 organisations. The same page an apology. 25 Also, the legal costs situation. Forget about the Page 93	1 exhausting, time-consuming, but we have that privilege. 2 There are hundreds and hundreds of people out there that 3 have been through horrific situations with the press 4 making up stories, and they have no recourse. So that's 5 another area. 6 And then I think long-term with the PCC that it 7 needs to be absolutely 100 per cent changed and there 8 needs to be a public body that basically is set up with 9 respected individual members of the public who learn the 10 rights of what the code should be, and I think it would 11 be a matter of public duty if they wish to serve on that 12 for a year, and then move on to another group for 13 another year, so that nobody is accessible to be bribed 14 or to be motivated in any way, or to be blackmailed or 15 threatened in any way to make a decision that benefits 16 the perpetrator, as in potentially the tabloid newspaper 17 who wrote the horrific story about the particular 18 person. 19 So I think it needs to -- the power needs to be 20 taken away from the editors and given to the public to 21 decide. 22 Q. Thank you very much. 23 A. Can I say one more thing? 24 Q. Yes, of course. 25 A. Regarding the paparazzi, the biggest problem, having Page 95
1 people that have the money to fight it. I set up 2 a website called uk.com in 2007 because people were 3 writing to me and saying, "I know how you feel, my son 4 tried to commit suicide because the newspapers said that 5 he'd upset a girl", "My daughter did this", really 6 horrific things which motivated me to start this website 7 and get more information and start investigating myself 8 reporters who were writing horrific stories about me. 9 I decided how would they like it if I started 10 investigating them, and I found out a lot of things that 11 we will be using but on the criminal side. 12 What I found was that so many of these people wanted 13 to sue the newspaper, but they had absolutely no money, 14 and then if they did a no win no fee case, they were 15 still going to be responsible for any costs that the 16 court didn't insist were paid by the newspapers. So 17 I think when somebody has won a court case outright, all 18 the costs have to be covered, because you're never 19 allowing somebody with no money to do a genuine CFA, 20 a no win no fee, and it's very unfair, and there are 21 a lot of people out there suffering who have been 22 through horrific situations and do not have any recourse 23 or right of reply because they don't have the finances. 24 I mean, we're in a privileged position that we can 25 fight our case. It's still emotionally draining, Page 94	1 worked with the police a lot now over a number of years, 2 is they feel helpless. They see a situation, they know 3 there are 20 people outside your house, but they're 4 standing on a public footpath and there's nothing they 5 can do about it. It's quite obvious harassment and 6 stalking, but it's a public footpath and because they 7 have a camera they're allowed to stand there. 8 I feel that if all photographers, paparazzi, 9 whatever you want to call them, are licensed and that no 10 newspaper can use a photograph unless it's from 11 a licensed photographer who has been given all the rules 12 and regulations and codes and, you know, not harassing, 13 and then they can basically be struck off should they 14 cross the line in that area, and it means it's regulated 15 in a proper way. As Sienna Miller said, why is it okay 16 for her to run down a dark alleyway with 20 17 photographers following her? If there was 20 men 18 without a camera chasing her, you know, that would be 19 criminal, so why is that okay? 20 So I feel that changing law is a very difficult 21 thing, but in the short term certain things can be 22 implemented quite quickly to stop this. 23 MR JAY: Thank you very much indeed, Ms Mills. 24 LORD JUSTICE LEVESON: Thank you very much. 25 A. Thank you. Page 96

24 (Pages 93 to 96)

1 MS PATRY HOSKINS: Sir, the next witness is Ms Stanistreet 2 from the NUJ. I'll just let Ms Mills vacate. 3 LORD JUSTICE LEVESON: Certainly. 4 MS MICHELLE STANISTREET (affirmed) 5 Questions by MS PATRY HOSKINS 6 MS PATRY HOSKINS: Thank you very much. Could you please 7 state your full name. 8 A. Michelle Stanistreet. 9 Q. Ms Stanistreet, you've provided the Inquiry with three 10 separate statements. Can just confirm what they are. 11 The first was your opening statement, also referred to 12 as your first witness statement. There's then been 13 a second witness statement and two exhibits, which have 14 been the subject of a ruling from the Chairman, and 15 a third statement on Derek Webb and press cards and so 16 on, which I'll come to. Is that your evidence to the 17 Inquiry? 18 A. Yes, it is. 19 Q. Can you confirm that the contents of all the statements 20 I've referred to are true and accurate to the best of 21 your knowledge and belief? 22 A. I can confirm that, yes. 23 Q. I'm going to take them chronologically, and start with 24 the first statement. If we look at the first page of 25 the statement, I can just touch on your career history. Page 97	1 probably on that basis have said what you want to say 2 about it, but there's one issue I'd like to take up 3 again on that if I can and that's the campaign for 4 a conscience clause. 5 You explained in your opening statement that the NUJ 6 has campaigned for a conscience clause for many years. 7 In the light of everything that you've heard at this 8 Inquiry over the past few months, is that something that 9 the NUJ would still advocate? And if so, why? 10 A. I think everything we've heard at the Inquiry to date 11 has just shown exactly why it's so vital that 12 journalists have the protection of that conscience 13 clause, so that when faced with pressure to do something 14 that's unethical, when faced with a directive from the 15 editor to carry out a piece of work that they believe 16 contravenes the NUJ's code of conduct, that as members 17 they sign up to adhere to, they can stand up and say, 18 "Actually, I'm not going to carry out that work, and I'm 19 invoking my conscience clause in doing so", and they can 20 take that stance and stand up for their journalistic 21 ethics knowing that they can't then be sacked or 22 dismissed summarily for not adhering to their own 23 personal contract with their employer. As things stand, 24 journalists simply don't have that protection. 25 LORD JUSTICE LEVESON: Is there a difference between the NUJ Page 99
1 You explain on the first page that you are the elected 2 general secretary of the National Union of Journalists. 3 Prior to that you worked as a journalist for ten years 4 at the Sunday Express newspaper as a feature writer and 5 books editor. You were the NUJ mother of the chapel at 6 Express Newspapers as well as the national 7 representative for newspapers and agencies on the NUJ's 8 ruling NEC. In fact, you became the first woman in the 9 NUJ's history to be elected as general secretary 10 in April 2011, and the first woman deputy general 11 secretary elected in 2008. 12 A. Yes. 13 Q. All accurate? 14 A. Yes. 15 Q. Then you tell us a little about the National Union of 16 Journalists. You explain that it is the voice for 17 journalism and for journalists across the UK and 18 Ireland. It was founded in 1907 and currently has 19 around 38,000 members. You explain that that 20 38,000-strong membership works in all sectors of the 21 media, including staff, students and freelancers, 22 writers, reporters editors, subeditors, photographers, 23 illustrators and people who also work in PR. 24 I am not going to spend very long with you on your 25 first statement because you read it out and I think you Page 98	1 conscience clause in their deal with you and the 2 approach of the PCC? 3 A. We have -- there are different codes of conducts that 4 exist, and we believe ours -- ours it is very 5 straightforward, it's ten points. They are principles 6 that all journalists who are members of our union adhere 7 to, but nobody at the moment has this kind of conscience 8 clause. It just doesn't exist. So at the moment 9 journalists, wherever they work in the media industry, 10 don't have that protection. And if they don't have at 11 the same time a collective organisation within that 12 workforce, a trade union voice, they don't even have 13 anybody independent to turn to and to raise concerns 14 that they have or to highlight the pressure that they're 15 coming under to deliver work that is contravening their 16 ethics. 17 LORD JUSTICE LEVESON: The reason I ask the question is 18 slightly different, because there are many 19 journalists -- you may have 38,000 -- who aren't members 20 of the NUJ, yet would doubtless want the protection of 21 a clause to permit them to refuse to do something that 22 didn't comply with an accepted code of ethics. So what 23 I'm really testing is whether a conscience clause 24 couldn't be sufficiently drafted to fit whatever code of 25 conduct ultimately there is. Page 100

25 (Pages 97 to 100)

1 A. I think it absolutely could be drafted in that way and 2 to deliver that. I mean, we'd love it if the industry 3 adopted our code of conduct as standard. I think -- you 4 know, and there's scope for that in some quarters. 5 I know there are even people within the PCC who would 6 respect our code of conduct and think it's a very good 7 one, but I think there needs to be a recognised code of 8 conduct and then journalists, wherever they work, should 9 have the protection of the conscience clause, and 10 employers shouldn't be able to opt out of that. It 11 should be something that's there and available to all 12 journalists to protect them in their day to day work. 13 LORD JUSTICE LEVESON: Okay. 14 MS PATRY HOSKINS: Since you've touched on the code of 15 conduct, we should probably turn it up briefly. It's 16 reference number 02396 and it was annexed to the first 17 statement of Ms Stanistreet. Is there any aspect of 18 that that you'd like to draw to our attention? Do you 19 have that with you? 20 A. I do. 21 Q. Are there any aspects about it you'd particularly like 22 to draw to the Chairman's attention, given the answers 23 you've just given us? 24 A. I think -- I mean, they're all very clear principles, 25 there's 12 of them, and it -- they highlight not just Page 101	1 union for journalists here, and when they have 2 a difficulty, they just simply don't have anywhere to 3 turn internally. And whilst of course we represent 4 individual members wherever they work, it's within very 5 severe constraints and limitations if we don't have, as 6 a trade union, the right to collective bargaining within 7 that workplace, because of course the NUJ doesn't simply 8 deal with issues of bread and butter trade union, pay 9 and terms and conditions. We're there to defend 10 journalistic ethics and the very principles by which the 11 industry should set its standards. 12 Q. All right. Can I move on to the second statement or was 13 there anything else you wanted to say? 14 A. No, that's fine. 15 Q. The second statement was prepared with a view to 16 ensuring that the voices of anonymous journalists could 17 be heard at this Inquiry. I want to take you through 18 some the paragraphs of the statement before we look at 19 the exhibits thereto. Can we turn to paragraph 4 20 onwards of this statement first of all. 21 A. Yes. 22 Q. You explain there that you and other officers and 23 members of the NUJ spent much time over several weeks 24 identifying journalists to give evidence of their 25 experiences of the culture, practice and ethics of the Page 103
1 the principles by which a journalist stands by in terms 2 of their ethics and how they carry out their work, but 3 I would like to stress how actually it also very much 4 stresses public accountability and the accountability 5 and responsibility that journalists have in carrying out 6 their work to ordinary members of the public, and that's 7 something, as the NUJ, that we've always campaigned very 8 hard for. You know, we believe that that public 9 accountability is also a very important element of this 10 that employers need to take much more seriously than 11 they currently do. 12 Q. Before I turn away from the first statement, is there 13 anything that you wanted to particularly draw out from 14 that statement? 15 A. I think one of the key -- the key things that I believe 16 I explained in my opening statement and that I think is 17 really fundamental when we're looking at the future as 18 to how we could avoid the situation that we've got to so 19 far, and I think it's vital that journalists have the 20 protection of an independent trade union within their 21 workplace. Unfortunately, that is simply not the case 22 for so many journalists who work in the industry at the 23 moment. Not only do they not have a recourse to that in 24 their workplace, they work for employers who are 25 actively hostile to the NUJ as the independent trade Page 102	1 press to the Inquiry. You circulated the entire 2 membership in November to ask if any member had and 3 would provide evidence to the Leveson Inquiry. You 4 attach the circular at MS2. 5 If you look at MS2, it's a three and a half page 6 letter, it makes clear that the NUJ has been granted 7 core participant status, it explains what the NUJ is 8 planning to do at this Inquiry. Then at the bottom of 9 Page 3 it says this: 10 "To that end, the NUJ is asking for members to come 11 forward and share your experiences, whether it's on 12 journalistic practices, your experience of how matters 13 ethical are handled in your current or previous 14 workplace, about how your working culture could be 15 improved or problems you have had to deal with that you 16 feel the Leveson Inquiry should consider. Please get in 17 touch with me. 18 "Lord Justice Leveson has also been clear in stating 19 that he is interested in the full breadth of culture, 20 practice and ethics in the press. That means the good 21 practice as well as the bad. This is an Inquiry that 22 could shape the future of our industry and it is vital 23 that the views of working journalists are heard and 24 seriously considered." 25 And then you go on to say that you will deal with Page 104

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1 queries personally and in confidence and testimony can 2 be put through to the Inquiry anonymously. 3 A. Yes. 4 Q. Can you tell us perhaps -- you say, going back to your 5 statement, paragraph 5, around 40 journalists, members 6 of the union, got in touch with you as a result, and you 7 personally interviewed them either face to face or on 8 the telephone. Did any of them provide you with written 9 evidence? 10 A. Yes, some did and some I spoke to and they also sent me 11 information in writing. 12 Q. You explain further down the same paragraph that in MS1, 13 the first exhibit to this statement, you have reported 14 what some 13 of them told you. Is there a correction to 15 be made there? 16 A. It's actually 12. 17 Q. How did you get down from 40 to 12? 18 A. Many journalists got in touch with me to share their 19 thoughts about how the Inquiry was going, about the 20 types of witnesses who were coming forward. Some 21 journalists wanted to give ideas and suggestions about 22 future model of press regulation, which we're going to 23 be dealing with separately, we'll be making a separate 24 submission about the NUJ's suggested model of future 25 regulation. So there was a variety of issues that Page 105	1 the journalists knew each other or had spoken to each 2 other in advance of coming to talk to you? 3 A. I spoke to journalists, as far as I know they haven't 4 been speaking to other -- none of them are connected in 5 any way. They are journalists who work in a range of 6 different newspapers, they are journalists who live in 7 a variety of different places, and no, there are no 8 shared links. But I would say that journalism is -- 9 it's a small pool of people relatively as an industry 10 and many journalists know other journalists within their 11 industry. That's just the way things are. 12 Q. Did you personally ask any questions to ascertain 13 whether or not they had spoken to each other in advance 14 of coming to talk to you? 15 A. Yes, and they hadn't. 16 Q. Did you ask -- 17 A. Sorry, I should also add that the very fact of them 18 coming to talk to me wasn't something that they were 19 sharing with other people. It was something they were 20 deliberately being very cautious about and absolutely 21 didn't want anybody else to know that they were coming 22 forward and talking to me. 23 Q. Did you ask -- sorry, I've been asked a number of 24 questions to put to you and I'm trying to do that. Did 25 you ask whether the journalists had spoken to others, Page 107
1 people were raising with me. 2 Some people I spoke to and they shared experiences 3 on a whole range of different issues, many of which is 4 covered here, whether it's on bullying or it's treatment 5 that they've experienced or examples of unethical 6 practice, but they absolutely didn't want it to be 7 shared even in confidence. 8 Q. Did you reject anyone who may have provided positive 9 feedback about their experiences of being a journalist? 10 A. No, absolutely not, and as you can see, I was very clear 11 in the circular that I sent out, which we also 12 disseminated through the unions, email bulletins on our 13 website, that actually I wanted to hear and the Inquiry 14 wanted to hear, more importantly, examples of the good 15 as well as the bad, and no, sadly, I haven't had a queue 16 of journalists who were coming forward to share great 17 experiences in their workplace. 18 LORD JUSTICE LEVESON: Presumably people who wanted to 19 applaud the work of their employers wouldn't be afraid 20 of doing so publicly. 21 A. Absolutely not. I haven't seen many of them here in the 22 Inquiry sharing that kind of testimony with you. 23 LORD JUSTICE LEVESON: Well. 24 MS PATRY HOSKINS: When you spoke to the journalists who 25 came forward, did you take any steps to check whether Page 106	1 such as Mr Davies, Nick Davies, for example, or anyone 2 else who have given evidence to the Inquiry based on 3 what they were told? 4 A. No, I didn't ask them that question about Nick Davies, 5 nor would I. Nick has written a book in which he 6 obviously has his own sources. I wouldn't expect any 7 journalist or anybody to tell me that they were 8 a confidential source for another piece of journalism or 9 for a book. As a journalist myself, I would jealously 10 guard my own sources and protect their confidentiality 11 and I would absolutely respect Nick's protection of his 12 sources and the anonymity of the people who have come 13 forward and spoken to him. 14 Q. So you sent out this letter, got some responses. In the 15 end, 12 permitted you to record what they'd said in this 16 way and then present it in MS1, which we're going to 17 come on to look in a moment. Can you tell us about how 18 the interviewed were conducted? Did you take 19 contemporaneous notes? 20 A. I did. For all of the interviews that I conducted, 21 I took contemporaneous notes. 22 Q. How did you decide which questions to ask them? 23 A. I wanted to talk to each of them about their 24 experiences, about their time as a journalist in a range 25 of whatever workplaces that they'd been in. I asked Page 108

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1 them -- I mean, the way that actually most of the 2 interviews happened is that once people started talking, 3 they literally covered an awful lot of terrain in many 4 instances, particularly in the cases about bullying. 5 I asked them did they feel that they had support to 6 speak out about journalistic -- you know, their 7 journalistic ethics or about the treatment that they 8 were on the receiving end of, and I asked them whether 9 or not -- why they didn't feel that they could speak 10 openly and publicly about their experiences to the 11 Inquiry. 12 Q. Presumably you were taking a manuscript note of these 13 conversations. When did you type up the notes? 14 A. Immediately after, which is my practice as a journalist 15 anyway. This would have been -- this is the way 16 I worked when I was working full-time as a journalist. 17 I was a feature writer and books editor, so taking 18 lengthy interviews was my day-to-day work. I have 19 always relied on handwritten notes, shorthand, 20 handwritten notes, even in times when I've used 21 a dictaphone, and all of the people I spoke to when 22 I was carrying out personal interviews them, many of 23 them absolutely specified that I could not use 24 a dictaphone, that they didn't want anything recorded, 25 so as a matter of course for all of the interviews, Page 109	1 and as clear an insight into the reality of working life 2 for most ordinary journalists, far too many journalists 3 in the industry. So if there had've been positive 4 things to say, I would have happily left them in there 5 as well. I haven't edited to suit at all. 6 Q. I'm still going through my list of questions I've been 7 asked to put to you. Have each of the journalists now 8 seen and confirmed that the parts of MS1 that concern 9 them are accurate? 10 A. Yes, and I've spoken to all of the journalists, yes. 11 Q. On 7 February, you may be aware, Lord Justice Leveson 12 gave a ruling on the admission of anonymous evidence 13 that you've collated, and at paragraph 21 of that, he 14 said this: 15 "I am not prepared to rule out these statements on 16 the basis of failure to provide notes, but will consider 17 adopting the same practice pursued in relation to the 18 challenge to the transcript provided by Chris Atkins. 19 That would require Ms Stanistreet to show counsel to the 20 Inquiry copies of her notes, redacted to remove the name 21 of any journalist who provided the information, thereby 22 protects his or her anonymity. Counsel will then be 23 able to confirm the fair presentation of the material, 24 and if there is any difficulty in that regard, I will 25 reconsider the matter." Page 111
1 I did handwritten notes and typed them up immediately 2 afterwards. 3 Q. And you didn't record any of them? 4 A. No. 5 Q. When you were transcribing the manuscript notes and 6 typing them up and then creating MS1, how did you edit 7 what you had been told? What did you leave out, I think 8 is the question? 9 A. There were some specific examples, anecdotes, that some 10 individuals shared that would have absolutely identified 11 them as journalists, so anything that would have enabled 12 people to piece together their identity, even by jigsaw 13 means, I omitted. So these would have been specific 14 examples of, "When I was writing this particular story 15 or tasked with this particular job, this is what 16 happened to me", so in terms of the generalities of the 17 treatments, that's remained in there, but there are some 18 examples of specific occasions where I felt, and the 19 journalist I was talking to felt, it would have enabled 20 somebody else to figure out who they were. 21 Q. Did you leave out any material that could conceivably be 22 relevant to the issues that the chairman is considering 23 at this Inquiry? 24 A. No, I didn't. I wanted the chairman and I wanted the 25 Inquiry and the general public to have as broad a view Page 110	1 Now, it's not usual for counsel to the Inquiry to 2 give evidence, so I'm going to ask you to confirm 3 a series of statements, if I can. 4 Can you confirm that we met yesterday afternoon? 5 A. We did. 6 Q. I viewed all your notes that were relevant to this 7 paragraph of the ruling? 8 A. (Nods head). 9 Q. And you showed me 12 sets of notes relating to all 12 10 journalists referred to in MS1? 11 A. I did. 12 Q. You told me that although you spoke with all 12 13 journalists, some of them had sent written notes 14 containing their versions of events and you also showed 15 me those notes prepared by the journalists themselves? 16 A. I did. 17 Q. And then there's a reference to the fact that you typed 18 up your notes; we've covered that. 19 Sir, I don't think Ms Stanistreet is going to be 20 able to confirm the conclusions that I've reached but 21 you've seen -- 22 LORD JUSTICE LEVESON: No, she isn't. I'm prepared, so that 23 it's clear and within the public domain: you undertook 24 that exercise with Ms Stanistreet's consent. There is 25 absolutely nothing that you have seen that in any sense Page 112

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1 might assist core participants or undermine anything 2 that the witnesses have said. 3 MS PATRY HOSKINS: That's correct. 4 LORD JUSTICE LEVESON: In other words, you've done the 5 exercise. 6 MS PATRY HOSKINS: I have. 7 LORD JUSTICE LEVESON: And you're satisfied that everything 8 has been done which I required to be done. 9 MS PATRY HOSKINS: That's correct. 10 LORD JUSTICE LEVESON: Thank you. 11 Well, that's not evidence, but I accept it. 12 MS PATRY HOSKINS: Sir, I was going to move on now to look 13 at the MS1 in a little more detail, but given the time, 14 I'm wondering if, before I move on to that, we should 15 simply break and come back early. 16 LORD JUSTICE LEVESON: Yes, we'll start again at 1.55, if 17 that's all right. Thank you. 18 (12.55 pm) 19 (The luncheon adjournment) 20 21 22 23 24 25 Page 113	

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