

# **EXHIBIT N**

<p>1 Friday, 11 May 2012</p> <p>2 (10.00 am)</p> <p>3 LORD JUSTICE LEVESON: Yes, Mr Jay.</p> <p>4 MR JAY: Sir, the witness today is Mrs Rebekah Brooks,</p> <p>5 please.</p> <p>6 LORD JUSTICE LEVESON: Thank you.</p> <p>7 MRS REBEKAH MARY BROOKS (sworn)</p> <p>8 Questions by MR JAY</p> <p>9 MR JAY: Your full name, please, Mrs Brooks?</p> <p>10 <b>A. Rebekah Mary Brooks.</b></p> <p>11 Q. May I ask you, please, to look at the large file in</p> <p>12 front of you and identify the two witness statements you</p> <p>13 have provided us with. The first is under tab 1,</p> <p>14 a statement dated 14 October of last year, and secondly</p> <p>15 under tab 2, a statement dated 2 May of this year. The</p> <p>16 principal focus today will be on the second statement,</p> <p>17 but are you content to confirm the truth of both</p> <p>18 statements?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. I'll attempt a timeline of your career, Mrs Brooks.</p> <p>21 Tell me if I make any mistakes. You joined</p> <p>22 News International on the Sunday magazine of the News of</p> <p>23 the World in 1989; is that right?</p> <p>24 <b>A. That's right.</b></p> <p>25 Q. In 1995 you were appointed deputy editor of the News of</p> <p style="text-align: center;">Page 1</p>	<p>1 <b>A. Thank you, sir.</b></p> <p>2 MR JAY: The other constraints which are borne upon you may</p> <p>3 relate to documents, including emails and texts, or more</p> <p>4 particularly their absence. Would you please look at</p> <p>5 paragraph 30 of your second witness statement, which is</p> <p>6 our page 02577.</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. You make it clear there that you have had reference to</p> <p>9 a diary which was kept by your former PA. May we be</p> <p>10 clear what sort of diary we're talking about? Is it an</p> <p>11 ordinary desk diary or is it an Alastair Campbell-type</p> <p>12 diary?</p> <p>13 <b>A. No, it's definitely not an Alastair Campbell diary.</b></p> <p>14 <b>It's my PA's old desk diaries, so the appointments in</b></p> <p>15 <b>there are not the complete picture and it's difficult to</b></p> <p>16 <b>know whether actually some of the meetings took place.</b></p> <p>17 <b>So I've done my best to give you a schedule but it's</b></p> <p>18 <b>more of a flavour than precise diary.</b></p> <p>19 Q. There's a schedule of appointments but it's not</p> <p>20 a narrative of what was discussed on any particular</p> <p>21 occasion?</p> <p>22 <b>A. No.</b></p> <p>23 Q. Is that fair? At paragraph 31, Mrs Brooks, you say that</p> <p>24 since your departure from News International, you've had</p> <p>25 no access to your work emails:</p> <p style="text-align: center;">Page 3</p>
<p>1 the World under Mr Hall, in 1998 appointed deputy editor</p> <p>2 of the Sun under Mr Yelland, and in May 2000, editor of</p> <p>3 the News of the World, aged 31; is that right?</p> <p>4 <b>A. Yes, that's right.</b></p> <p>5 Q. Editor of the Sun, January, I think, 2003.</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. CEO of News International -- can we be clear of the</p> <p>8 dates here, because there's been some doubt about it.</p> <p>9 Was the announcement of your appointment in June 2009</p> <p>10 but you took up the job formally on 2 September 2009?</p> <p>11 <b>A. That's correct, yes.</b></p> <p>12 Q. Then you resigned on 17 July 2011 --</p> <p>13 <b>A. 15th.</b></p> <p>14 Q. 15 July.</p> <p>15 <b>A. (Nods head)</b></p> <p>16 Q. So we're completely clear about the constraints bearing</p> <p>17 on your evidence, you are under police investigation in</p> <p>18 the context of Operation Weeting, Operation Elveden and</p> <p>19 also for allegedly perverting the course of justice; is</p> <p>20 that true?</p> <p>21 <b>A. It is.</b></p> <p>22 LORD JUSTICE LEVESON: Mrs Brooks, I'm grateful to you for</p> <p>23 the obvious care you've put into the statements that</p> <p>24 you've made, and I'm conscious of the difficulty the</p> <p>25 time must be for you.</p> <p style="text-align: center;">Page 2</p>	<p>1 "However, the emails and texts that were on my</p> <p>2 BlackBerry at the time I left News International were</p> <p>3 imaged and saved."</p> <p>4 So does it follow that your work email account was</p> <p>5 blocked to you in some way or did something different</p> <p>6 happen?</p> <p>7 <b>A. No, I think it was blocked on the day I left.</b></p> <p>8 Q. When you say the BlackBerry emails and texts were imaged</p> <p>9 and saved, can you tell us approximately when those</p> <p>10 events occurred?</p> <p>11 <b>A. So my BlackBerry was imaged by my legal team when it was</b></p> <p>12 <b>returned from the MPS and it contained, I think, about</b></p> <p>13 <b>six weeks of emails and less so of texts, but about</b></p> <p>14 <b>a month of texts. But we had to image them and we had</b></p> <p>15 <b>some problems with that.</b></p> <p>16 Q. So approximately when was your BlackBerry returned by</p> <p>17 the MPS?</p> <p>18 <b>A. I think about three weeks later, maybe longer.</b></p> <p>19 Q. Can you give us a month, please, so that we --</p> <p>20 <b>A. Oh sorry, in July.</b></p> <p>21 Q. 2011, obviously?</p> <p>22 <b>A. 2011.</b></p> <p>23 Q. So we have, as you explain, emails and texts which only</p> <p>24 cover a limited period, from the beginning of June 2011</p> <p>25 until, you say, 17 July. Maybe 15 July or 17 July --</p> <p style="text-align: center;">Page 4</p>

1 (Pages 1 to 4)

<p>1 A. I think it was the 17th.</p> <p>2 Q. You also confirm that there is nothing of relevance to</p> <p>3 this Inquiry in your private accounts, by which of</p> <p>4 course you're referring to private email accounts; is</p> <p>5 that right?</p> <p>6 A. That's correct.</p> <p>7 Q. Does it follow then that any emails you might have had</p> <p>8 with politicians would only have been through your NI</p> <p>9 email account?</p> <p>10 A. That's correct.</p> <p>11 Q. And any text message contact with politicians would only</p> <p>12 have been on your BlackBerry, which was a work</p> <p>13 BlackBerry?</p> <p>14 A. Yes.</p> <p>15 Q. There was no other mobile phone?</p> <p>16 A. No.</p> <p>17 Q. Okay. I've been asked to put to you this question: were</p> <p>18 there any emails or texts from either Mr Cameron or</p> <p>19 Mr Osborne on your BlackBerry at the time you left</p> <p>20 News International?</p> <p>21 A. No, although when we got the image back, there was one</p> <p>22 from Mr Cameron that was compressed, so -- in June, but</p> <p>23 there's no content in it.</p> <p>24 Q. So it's a complete mystery what, if anything, it might</p> <p>25 contain; is that right?</p> <p style="text-align: center;">Page 5</p>	<p>1 sent commiserations.</p> <p>2 Q. Okay. Mr Blair, did he send you one?</p> <p>3 A. Yes.</p> <p>4 Q. Probably not Mr Brown?</p> <p>5 A. No. He was probably getting the bunting out.</p> <p>6 Q. It has been reported in relation to Mr Cameron -- but</p> <p>7 who knows whether it's true -- that you received</p> <p>8 a message along the lines of: "Keep your head up." Is</p> <p>9 that true or not?</p> <p>10 A. From?</p> <p>11 Q. From Mr Cameron, indirectly. You'll have seen that in</p> <p>12 the Times.</p> <p>13 A. Yes, I did see it in the Times. Along those lines. It</p> <p>14 was more -- I don't think they were the exact words but</p> <p>15 along those lines.</p> <p>16 Q. Is the gist right, at least?</p> <p>17 A. Yes, I would say so. But it was indirect. It wasn't</p> <p>18 a direct text message.</p> <p>19 Q. Did you also receive a message from him via an</p> <p>20 intermediary along these lines:</p> <p>21 "Sorry I could not have been as loyal to you as</p> <p>22 I have been, but Ed Miliband had me on the run."</p> <p>23 Or words to that effect?</p> <p>24 A. Similar, but again, very indirectly.</p> <p>25 Q. So, broadly speaking, that message was transmitted to</p> <p style="text-align: center;">Page 7</p>
<p>1 A. Yes.</p> <p>2 Q. Did you receive messages of commiseration or support</p> <p>3 from politicians, in July 2011 in particular?</p> <p>4 A. Some.</p> <p>5 Q. Either directly or indirectly; is that right?</p> <p>6 A. Mainly indirectly.</p> <p>7 Q. Yes. In order to get a fair picture, since if we focus</p> <p>8 on one individual alone the picture will logically be</p> <p>9 distorted, are you able to assist us with from whom you</p> <p>10 received such messages?</p> <p>11 A. I had some indirect messages from some politicians, but</p> <p>12 nothing direct.</p> <p>13 Q. The indirect ones, who were the politicians?</p> <p>14 A. A variety, really, but -- some Tories, a couple of</p> <p>15 Labour politicians. Very few Labour politicians.</p> <p>16 Q. Can we be a bit more specific, Mrs Brooks?</p> <p>17 A. Sorry, I'm not trying to be evasive. I received some</p> <p>18 indirect messages from Number 10, Number 11, Home</p> <p>19 Office, Foreign Office.</p> <p>20 Q. So you're talking about secretaries of state,</p> <p>21 Prime Minister, chancellor of the Exchequer, obviously,</p> <p>22 aren't you?</p> <p>23 A. And also people who worked in those offices as well.</p> <p>24 Q. Labour politicians? How about them?</p> <p>25 A. Like I say, there were very few Labour politicians that</p> <p style="text-align: center;">Page 6</p>	<p>1 you, was it?</p> <p>2 A. Yes.</p> <p>3 Q. Out of interest, do you happen to know how these</p> <p>4 messages do enter the public domain?</p> <p>5 A. We have a very strong free press, who have great access</p> <p>6 to politicians, so ...</p> <p>7 Q. We may be coming back to that, but you can't be of any</p> <p>8 more particularity than that, can you?</p> <p>9 A. Journalists doing their job.</p> <p>10 Q. Mr Cameron also said publicly:</p> <p>11 "We all got too close to News International."</p> <p>12 Or words to that effect. Was that a view he ever</p> <p>13 communicated to you personally?</p> <p>14 A. No.</p> <p>15 Q. Can I ask you, please, about Mr Murdoch, by way of</p> <p>16 background. We know he told the House of Lords</p> <p>17 communications committee -- this was back in 2007 when</p> <p>18 he was spoken to, I think, in New York -- that he was</p> <p>19 a traditional proprietor who exercises editorial control</p> <p>20 on major issues, like which party to back in a General</p> <p>21 Election or policy on Europe. Do you agree with that or</p> <p>22 not?</p> <p>23 A. Yes.</p> <p>24 Q. Does it apply as much to the News of the World as the</p> <p>25 Sun or does that only apply to the Sun?</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 A. I think Mr Murdoch is probably more interested in the 2 Sun in terms of political issues, but it also applied to 3 the News of the World as well when I was there. 4 Q. Your evidence to the self-same committee, question 1461: 5 "I think it would be fair to say that, before any 6 appointment, he knew me pretty well." 7 You'd presumably stand by that, would you? 8 A. Well, particularly before my appointment to editor of 9 the Sun. 10 Q. Yes, 2003, and probably in 2000 when you were appointed 11 editor of the News of the World or not? 12 A. Less so. 13 Q. Then question 1462: 14 "He would be aware of my views, both social views, 15 cultural views and political views." 16 Again, presumably you stand by that or not? 17 A. Yes. 18 Q. Then you said: 19 "Take Europe, for example. Mr Murdoch was 20 absolutely aware of my views on Europe. I think even 21 before I became editor of the News of the World, maybe 22 even deputy editor." 23 Is that right? 24 A. Yes. 25 Q. Without delving into this in any great detail, Page 9</p>	<p>1 was too much of it, although he liked X Factor. 2 Q. In terms of your social and cultural views -- I'm not 3 going to pry into that too much, but are you a strong 4 believer in human rights and the Human Rights Act? 5 A. Not particularly, no. I mean, in its form. Obviously 6 its existence, absolutely, but there were parts of the 7 Human Rights Act that we campaigned against in the Sun 8 when I was there. At one point, the Conservative Party, 9 I think, were going to repeal it and replace it with 10 a British bill of rights. I think that was the case, 11 but I think that's now been dropped. 12 Q. We may come back to that issue in a more specific 13 context. 14 When you were appointed editor of the News of the 15 World in 2000, was that Mr Murdoch's decision? 16 A. I was actually told by Les Hinton that I was going to be 17 made editor of the News of the World and I didn't speak 18 to Mr Murdoch until after that. 19 Q. But was it his decision? 20 A. I think it was Mr Hinton's strong recommendation and -- 21 like I said, I didn't speak to Mr Murdoch until I'd 22 actually taken the job. 23 Q. There was some discussion at the seminars we had 24 in October in relation to the departure of Mr Hall. Are 25 you able to enlighten us as to that at all? Page 11</p>
<p>1 presumably you are a Eurosceptic; correct? 2 A. Yes, I suppose so. 3 Q. And politically, your position is fairly similar to 4 Mr Murdoch's, is it? 5 A. In some areas, yes. 6 Q. Which areas do they differ? 7 A. Well, we disagreed about quite a few things, more in 8 margins of it rather than the principles. So, I don't 9 know: the environment, DNA database, immigration, top-up 10 fees, the amount of celebrity in the paper versus 11 serious issues, columnists, the design, the headline, 12 size, the font size, the point -- I mean, you know, we 13 had a lot of disagreements, but in the main, on the big 14 issues, we had similar views. 15 Q. Yes. So on the issue of celebrity against serious 16 issues, where did each of you stand on that? 17 A. I liked more celebrity and he wanted more serious 18 issues. 19 Q. Why did you want more celebrity? 20 A. Well, I liked -- I thought the readers were quite 21 interested in -- you only have to look at the viewing 22 figures of BBC or ITV to see that it's the celebrity 23 programmes, the real life -- the reality programmes that 24 do so well, and I took from those figures that our 25 readers were quite interested in that. He thought there Page 10</p>	<p>1 A. No, I'm sorry. I was at the Sun at the time. 2 Q. Would the editorial line you took, in particular in 3 relation to the Sun, reflect Mr Murdoch's thinking? 4 A. I think, as I say in my witness statement, it really is 5 important to differentiate between Mr Murdoch's 6 thinking, my thinking, the political team's thinking and 7 the thinking of the readers. I mean, I know I spend 8 a lot of time on it in my witness statement but it's to 9 get across the point that it was -- the readers' views 10 were always reflected in any policy or politician or 11 political party. So I know Mr Murdoch, when he gave 12 evidence, he said, "If they want to know what I think, 13 read the Sun editorials", but I don't think he was being 14 totally literal about that. 15 Q. What his evidence was exactly: 16 "If you want to judge my thinking, look at the Sun." 17 Those were the exact words he used. 18 A. Yes. 19 Q. Whether it was an ill-guarded remark or not, it's not 20 for me to say, but some might think it was a considered 21 response to a question in fact from Lord Justice 22 Leveson. You'll recall that, won't you? 23 A. I don't think it was ill-guarded. I'm just saying I 24 don't think was literal. 25 Q. Why not, though? Page 12</p>

3 (Pages 9 to 12)



<p>1 A. Because there were lots of things in the Sun that 2 wouldn't reflect his views. 3 Q. I think he meant on the big points, not on the minutiae. 4 A. Okay. 5 Q. Would you agree with that? 6 A. I accept that. 7 Q. At paragraph 12 of your witness statement -- I'm now on 8 your second statement -- you give us a thumbnail sketch 9 of what the Sun is, what it represents, what its 10 cultural values are. It embodies an attitude, you say, 11 rather than a particular social class, et cetera. Then 12 you say: 13 "It is sometimes said that the relationship between 14 the Sun and its readers reflects the national 15 conversation. If you wanted to know what the nation was 16 talking about, you would look at the Sun." 17 We have a contrast here. Some would say: if you 18 want to know what Mr Murdoch is thinking, look at the 19 Sun, and then you're saying: if you want to know what 20 the nation's talking about, look at the Sun. Which is 21 correct? 22 A. The one in my witness statement. 23 Q. Why do you say that? 24 A. Because I wrote it and I believe it. 25 Q. What do you mean by "the nation" here?</p> <p style="text-align: center;">Page 13</p>	<p>1 It was meant to really say -- if -- for example, you 2 know, the conversation in the pub or the conversation at 3 work. So during the Manchester City/Manchester United 4 clash, you know, that conversation -- the incident that 5 happened there, that would be talked about in the pub 6 and that's what I meant by "national conversation". It 7 wasn't meant to be taken any more literally than that. 8 Q. A reflection then of the sort of debate which you would 9 hear in any pub, dining room table or whatever, but not 10 a reflection of the individual collective views of the 11 readership. Is that a fair description? 12 A. No, not particularly. I think -- no. 13 Q. I'm really leading into paragraph 15, Mrs Brooks, and 14 the myth, which you seek to explode, that newspaper 15 editors or proprietors are an unelected force. Well, 16 pausing there, that's true, isn't it? 17 A. I don't think it is, no. 18 Q. Who elects you, apart from Mr Murdoch? 19 A. We're not elected officials. 20 Q. You're saying it's a myth. But it's a truth, isn't it? 21 Newspaper editors or appropriates are an unelected 22 force, aren't they? 23 A. If you view them as that. I don't view editors as 24 unelected forces. 25 Q. So how do you view them then?</p> <p style="text-align: center;">Page 15</p>
<p>1 A. Well, I think if you accept that the Sun, for many, many 2 years, has been the biggest-selling newspaper in the 3 country and that the Saturday Sun overtook the News of 4 the World, I think, about five years ago, maybe longer 5 actually, in circulation terms. So you have this huge 6 readership. I don't know what the exact figure is 7 today, but we always used a sort of 8 million. The 8 paper next to that is the Daily Mail, which is 9 6 million. So I think I'm basing it on such a large 10 percentage of the British population who would come in 11 contact with the Sun. They might not read it every day, 12 but they would come in contact with the Sun at some 13 point or other. 14 Q. You're addressing a different point, because it assumes 15 that the nation is monolithic or homogeneous, which it 16 isn't. The bigger the readership is, it might be said 17 the more diverse its views are rather than the more 18 singular its views are. Do you see that point? 19 A. I do see that point, and I make it later on again in my 20 witness statement, which is -- and this has been touched 21 on throughout this Inquiry -- actually broadcast media 22 has become more and more influential and more and more 23 important over newspapers, because it's a fact that 24 newspaper circulations in the printed form are 25 declining. So I do accept that.</p> <p style="text-align: center;">Page 14</p>	<p>1 A. Journalists. 2 LORD JUSTICE LEVESON: But isn't the point you're really 3 making in paragraph 15 not so much about the unelected 4 force? One could talk about unelected, undemocratic, 5 whatever, if it's relevant. It's that you are shaping 6 and changing government policy to suit your own 7 interests. 8 A. Yes. 9 LORD JUSTICE LEVESON: Isn't that the myth you're really 10 talking about? 11 A. That was also what I was addressing there, yes. 12 LORD JUSTICE LEVESON: But there is no doubt -- or perhaps 13 you would disagree? -- that newspaper editors and 14 proprietors are a powerful force. They have a voice, 15 they have a megaphone. 16 A. I think I understand, sir, what you're saying. I think 17 what I'm trying to say is that, particularly for 18 newspapers like the Sun, you have to -- your power is 19 your readership. It's not an individual power. You 20 know, it's a readership power and I think that's really 21 important. 22 I think Tony Gallagher, the editor of the Telegraph, 23 said that if he fell under a bus, you know, the power of 24 his office would go, and I think -- just adding to his 25 point, I think at the Sun, the readers are the most</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 powerful. It is their voice that we try and reflect, 2 their injustices, their concerns that we try and tackle, 3 their interests we try and engage in. So I just don't 4 see — I think — I can't remember what the question was 5 but I was more reacting to the fact that every day the 6 readers can unelect us as newspapers.</p> <p>7 LORD JUSTICE LEVESON: Yes, we've heard that several times, 8 but I think we discussed yesterday, or certainly in the 9 recent past, the extent to which editors are reactive 10 and the extent to which they can in fact lead opinion. 11 They have to reflect the overall position of their 12 readership; I understand that. They can't suddenly go 13 out on a limb when they know their readers won't follow 14 them, but they are in a position to lead opinion. Would 15 you agree with that?</p> <p>16 A. I think you can present issues to the readership, yes, 17 and that's part of being an editor.</p> <p>18 MR JAY: And you present issues with a certain spin, 19 a certain slant, don't you?</p> <p>20 A. Well, depending on the paper, yes. I mean, you can do. 21 Q. Your paper --</p> <p>22 A. I wouldn't say "spin". I would say "attitude". 23 Q. Or perspective then?</p> <p>24 A. Okay.</p> <p>25 Q. You mentioned that the Sun, I think, was an attitude</p> <p style="text-align: right;">Page 17</p>	<p>1 Q. How often would he speak to you when you were editor of 2 the Sun?</p> <p>3 A. Very frequently.</p> <p>4 Q. Give us an idea, Mrs Brooks.</p> <p>5 A. Well, it wasn't a sort of — it wasn't a regular 6 pattern. Sometimes it could be every day. Sometimes, 7 if something else was going on around the world, it 8 would be less than that, but very frequently.</p> <p>9 Q. Even, evidently, when he wasn't in this country; is that 10 right?</p> <p>11 A. Mainly when he wasn't in the country, yes.</p> <p>12 Q. It's said that you had a close relationship with 13 Mr Murdoch. Various stories abound. Let's see whether 14 any of them are true. It's said that you used to swim 15 together when he was in London. Is that true?</p> <p>16 A. No, it isn't.</p> <p>17 Q. November 2005, we recall that you were arrested for 18 alleged assault on your ex-husband. You recall that, no 19 doubt?</p> <p>20 A. I do recall it, yes.</p> <p>21 Q. I think that you'd been to the 42nd birthday party of 22 Matthew Freud that evening, had you?</p> <p>23 A. I don't know if that was the birth date, but yeah, it 24 was a party, yeah.</p> <p>25 Q. So, evidently, other members of the Murdoch family would</p> <p style="text-align: right;">Page 19</p>
<p>1 rather than a particular social class, but maybe that 2 permeates all the way through.</p> <p>3 When you were editor of the News of the World — we 4 heard evidence yesterday from Mr Coulson of the degree 5 of contact Mr Murdoch had with his editor then. Would 6 your evidence be similar to Mr Coulson's or different, 7 if I can short circuit it in that way? The amount of 8 contacts or discussions.</p> <p>9 A. What did Mr Coulson say, sorry?</p> <p>10 Q. Well, that he phoned -- it varied, but it was on 11 Saturday evenings, if at all. It might be twice 12 a month, it might be less often than that.</p> <p>13 A. I'm sure that's right at the News of the World, yes.</p> <p>14 Q. And he was interested in the big stories, was he?</p> <p>15 A. Occasionally, yeah. I mean, Mr Murdoch's contact with 16 the News of the World was much more limited than the Sun 17 or other newspapers.</p> <p>18 Q. And when you become editor of the Sun, which is 2003, 19 paragraph 256 your statement, you say you believe that 20 Mr Murdoch was instrumental in your appointment; is that 21 right?</p> <p>22 A. Yes.</p> <p>23 Q. Do you know that to be true or you believe it to be 24 true?</p> <p>25 A. I know that to be true.</p> <p style="text-align: right;">Page 18</p>	<p>1 have been there, wouldn't they?</p> <p>2 A. I — I can't remember. Not particularly, but ...</p> <p>3 Q. Mr Rupert Murdoch was there, wasn't he?</p> <p>4 A. No, he wasn't.</p> <p>5 Q. It's said that you kept him waiting for a breakfast 6 meeting the following morning. Is that bit true?</p> <p>7 A. No.</p> <p>8 Q. And that he sent a dress to the police station. Is that 9 bit true?</p> <p>10 A. No.</p> <p>11 Q. So this is all fiction then?</p> <p>12 A. Completely. I don't know -- where is it from?</p> <p>13 Q. Various sources, but ...</p> <p>14 A. You need better sources, Mr Jay.</p> <p>15 Q. Well, confidential sources. They're all in the public 16 domain, actually, but I'm not expressing a view on their 17 reliability.</p> <p>18 A. I'm sorry --</p> <p>19 Q. It may be leading up to a question much later on in 20 relation to all of this.</p> <p>21 A. Okay.</p> <p>22 Q. There is evidence, though, I've seen that there was 23 a 40th birthday party for you at Mr Rupert Murdoch's 24 house. Is that correct?</p> <p>25 A. That is correct.</p> <p style="text-align: right;">Page 20</p>

5 (Pages 17 to 20)

<p>1 Q. Were politicians present on that occasion?</p> <p>2 A. Yes, some.</p> <p>3 Q. Mr Cameron and Mr Blair were presumably present, were they?</p> <p>4</p> <p>5 A. It was a surprise party for me, so I'm pretty -- I know</p> <p>6 Mr Blair was there. I'm not sure if Mr Cameron was.</p> <p>7 Possibly.</p> <p>8 Q. There are all sorts of stories as to what the birthday</p> <p>9 present was, but I'm not going to ask you because it's</p> <p>10 outside the --</p> <p>11 LORD JUSTICE LEVESON: Oh, please.</p> <p>12 A. You've asked me if I've been swimming with Mr Murdoch.</p> <p>13 Please ask me about the birthday present.</p> <p>14 MR JAY: No, I won't. In 2006, you were appointed chief</p> <p>15 executive officer of News International.</p> <p>16 A. 2009.</p> <p>17 Q. 2009. Paragraph 26, pardon me. Was that Mr Murdoch's</p> <p>18 idea?</p> <p>19 A. I discussed that appointment with James and</p> <p>20 Rupert Murdoch.</p> <p>21 Q. Was it Rupert Murdoch's idea?</p> <p>22 A. I think it was more James Murdoch's idea in the</p> <p>23 beginning, but both of them, both of their ideas.</p> <p>24 Q. Why was that job of interest to you?</p> <p>25 A. I think I'd been editing the Sun for seven years by</p> <p style="text-align: center;">Page 21</p>	<p>1 or Mr Murdoch, but then none of us are -- you know, we</p> <p>2 all have different shades of grey.</p> <p>3 Q. The same colour though; is that right?</p> <p>4 A. Not necessarily.</p> <p>5 Q. Okay. July 2011. Were you embarrassed when Mr Murdoch</p> <p>6 indicated that you were his priority?</p> <p>7 A. Are you referring to the -- when we -- in the street?</p> <p>8 Q. Indeed.</p> <p>9 A. I wasn't at the time, because I didn't think that's what</p> <p>10 he was saying. I -- he was being asked by many</p> <p>11 reporters lots of different questions, and I think</p> <p>12 someone said, "What's your priority", and he looked</p> <p>13 towards me and said, "This one." I took that to mean he</p> <p>14 meant as in this issue. It was only the next day when</p> <p>15 I saw how it could have also been interpreted in the</p> <p>16 papers that I realised that was the interpretation that</p> <p>17 had been put on it. So I wasn't embarrassed at the time</p> <p>18 because I didn't know that that's what he meant.</p> <p>19 LORD JUSTICE LEVESON: Oh.</p> <p>20 MR JAY: Your relationships with politicians. Can we go</p> <p>21 back to Mr Blair, and we'll do this chronologically.</p> <p>22 Paragraph 53 of your statement of claim. You say you</p> <p>23 met him on numerous political and social occasions and</p> <p>24 these meetings increased in frequency throughout his</p> <p>25 decade as Prime Minister. You had many formal, informal</p> <p style="text-align: center;">Page 23</p>
<p>1 then, and I was interested in -- very interested, like</p> <p>2 most journalists are, in looking at the future economic</p> <p>3 models of journalism and basically how you continue to</p> <p>4 financially keep, you know, high quality journalism</p> <p>5 going, and I think the digital age and the iPad and the</p> <p>6 paywalls, they were all of interest to me and something</p> <p>7 that I was looking forward to doing.</p> <p>8 Q. Okay. Now, Mr Mohan was your replacement as editor and</p> <p>9 I think he was your strong recommendation; is that</p> <p>10 right?</p> <p>11 A. He was, yes.</p> <p>12 Q. Why?</p> <p>13 A. He'd been my deputy for a few years, so I'd seen the</p> <p>14 paper that he'd edited in my absence, and also I'd</p> <p>15 attended a few more business management programmes in</p> <p>16 the last year of my editorship of the Sun -- a couple of</p> <p>17 modules at the LSE, some internal management</p> <p>18 programmes -- and Dominic had had much more time to edit</p> <p>19 the paper on his own, and I thought he was doing a very</p> <p>20 good job.</p> <p>21 Q. In terms of the general political perspective I've</p> <p>22 mentioned earlier, where you stood vis-a-vis Mr Murdoch,</p> <p>23 does Mr Mohan stand in more or less the same place or</p> <p>24 a different place?</p> <p>25 A. Not entirely -- Dominic is not entirely the same as I am</p> <p style="text-align: center;">Page 22</p>	<p>1 and social meetings with him, "some of which I have been</p> <p>2 able to detail", and you have also spoken on the</p> <p>3 telephone on a number of issues.</p> <p>4 You're giving a picture here of contact which became</p> <p>5 very frequent; is that fair?</p> <p>6 A. I think it became more frequent when I became editor of</p> <p>7 the Sun, but that probably would go for most</p> <p>8 politicians, although obviously, as you heard from</p> <p>9 Mr Murdoch, Mr Blair flew out to a News Corp conference,</p> <p>10 I think in around 1995, and I probably met him shortly</p> <p>11 after that. So it's -- and then he obviously -- they</p> <p>12 were in power for ten years, so it's over a very long</p> <p>13 period of time.</p> <p>14 Q. I'm sure there wasn't a key moment but an important date</p> <p>15 was 2003 when you became editor of the Sun. Did you</p> <p>16 find that your contacts with politicians generally</p> <p>17 increased from that point in time?</p> <p>18 A. Yes, I would say so.</p> <p>19 Q. It's also clear that -- tell me if this is wrong -- that</p> <p>20 you became friendly with Mr Blair?</p> <p>21 A. Yes.</p> <p>22 Q. Were there text and email exchanges with him or not?</p> <p>23 A. No, he didn't have a phone or -- mobile phone, or in</p> <p>24 fact, I think, use a computer when he was</p> <p>25 Prime Minister.</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 Q. So all the telephone contact is logically then only on 2 a landline, is it? 3 A. Yes. 4 Q. From his perspective. You say in paragraph 54: 5 "Tony Blair, his senior cabinet, advisers and press 6 secretaries were a constant presence in my life for many 7 years." 8 A. Mm. 9 Q. Why do you think that was? 10 A. I think they made sure it was, and I wasn't unique in 11 that. 12 Q. Why do you think they made sure it was? 13 A. I think you have to look particularly at 14 Alastair Campbell's appointment. I mean, he came from 15 being political editor of the Daily Mirror, and 16 Tony Blair's advisers put a huge store on certain 17 newspapers and I think that they made — shall we say 18 a shift change from the John Major government into 19 trying to get as much access to the press as possible. 20 I mean, millions of books have been written about this, 21 so it's not a particularly insightful comment but 22 relevant to that question. 23 Q. It's just like the Sun, then, reacting to its readers' 24 wishes. It's you, as an editor, reacting to the 25 politicians' wishes; is that correct?</p> <p style="text-align: center;">Page 25</p>	<p>1 readers. 2 Q. It depends if at all the line is crossed, because if 3 a friendship developed or an antipathy develops, then 4 the constant presence is in danger of being abused, 5 isn't it? 6 A. Well, I think if a politician or a Prime Minister ever 7 put a friendship with a media executive or a media 8 company in front of his or her abilities to do their 9 professional duties properly, then that is their 10 failing, and I think if a journalist ever compromised 11 their readership or their role as a journalist through 12 friendship, then that is their failing. So I think it's 13 simply put. 14 Q. Tony Blair and New Labour were arguably masters of spin. 15 What steps, if any, did you take to counteract that? 16 A. First of all, I actually think that Gordon Brown and 17 Charlie Whelan were masters of spin more than Alastair 18 Campbell and Tony Blair. I don't think — it's often 19 reported that it was Tony Blair and Alastair Campbell, 20 but I think the whole of New Labour engaged in a new 21 way, a more intense way, with the media when they came 22 to power. 23 Q. The question was: what steps, if any, did you take to 24 counteract that? 25 A. Well, I don't think any journalist takes a story from</p> <p style="text-align: center;">Page 27</p>
<p>1 A. No, not at all. 2 Q. But the impetus on your narrative is coming from the 3 politicians, not from the press. 4 A. I think — 5 Q. Which is correct? 6 A. I think the point of New Labour, if you like, embracing 7 the media in a different way was because they felt they 8 had a very big story to tell, at its best, shall we say. 9 They had a very big story to tell about the changes they 10 wanted to make or had made to the Labour Party. On the 11 press' side, me included, were journalists, and access 12 to politicians who can tell us things that we don't 13 know, explain things that are going on, tell us policy 14 that's being developed, all those things that we can 15 report back to our readers — I mean, that's 16 a journalist's job. 17 Q. Your job, you tell us, is to hold politicians to 18 account. 19 A. Absolutely. 20 Q. How can you do that if they are a constant presence? 21 A. Well, very easily, because you can find out quite easily 22 what's going on and hold them to account for it. 23 A constant presence doesn't mean that you don't hold 24 politicians to account. I think every journalist and 25 every newspaper does that all the time on behalf of its</p> <p style="text-align: center;">Page 26</p>	<p>1 a politician or a line from a politician and repeats it 2 verbatim in their newspaper without checking it or 3 analysing it. I mean, the role of a journalist is not 4 to just gather information; it's also to analyse and 5 prove that information. 6 Q. But you weren't disinterested in this, Mrs Brooks, 7 because you were on Mr Blair's side. You just made that 8 clear in the answer you gave a minute ago. Wouldn't you 9 agree? 10 A. I think when you back a political party in the way that 11 the Sun did in 1997 — I wasn't on the Sun then, but, 12 you know, I was a close observer — I don't think you 13 back them wholeheartedly. In fact, I think if you look 14 at the Sun's front pages from 1997 to when Tony Blair 15 left in 2007, you would at some point be quite confused 16 that it was actually supporting that party, particularly 17 on Europe but on other issues as well. 18 Q. On the level of personality, the clash that there was 19 between Mr Blair and Mr Brown, which you speak to in 20 your statement, you were on Mr Blair's side, weren't 21 you? 22 A. I think that — are you talking about the hostilities 23 between Gordon Brown and Tony Blair? 24 Q. Yes, you were talking about it in the first sentence of 25 paragraph 61 your statement.</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 A. Right. And what was the question, sorry, Mr Jay?</p> <p>2 Q. You were on Mr Blair's side, not Mr Brown's side,</p> <p>3 weren't you?</p> <p>4 A. What I said in the statement was that in the latter</p> <p>5 years -- and again, there's been much better political</p> <p>6 commentary on this from actually many of the books</p> <p>7 you've asked me to read for this Inquiry, but in the</p> <p>8 latter years of Tony Blair's prime ministership, the</p> <p>9 hostilities between him and Gordon Brown got</p> <p>10 increasingly worse and there did become a sort of</p> <p>11 Tony Blair camp and a Gordon Brown camp, and on</p> <p>12 particular issues -- say, for example, the welfare</p> <p>13 reform bill, which I think they first tried to get</p> <p>14 through in 2004 -- hostilities between Gordon Brown and</p> <p>15 Tony Blair were such that it didn't get through that</p> <p>16 time. We tried again. It was very important for Sun</p> <p>17 readers.</p> <p>18 So you would have an insight how those hostilities</p> <p>19 were affecting the way to govern. So you would have an</p> <p>20 opinion on them.</p> <p>21 Q. But whose side were you on, Mrs Brooks?</p> <p>22 A. Neither. On the side of the readers. It wasn't an</p> <p>23 automatic given that Alastair Campbell or Charlie Whelan</p> <p>24 were telling you the truth. It was our job to judge and</p> <p>25 analyse it.</p> <p style="text-align: center;">Page 29</p>	<p>1 sure it's true. You know, let's say 50/50. But at the</p> <p>2 end, particularly, we were on the side of Mr Blair.</p> <p>3 Q. So totally disinterestedly, in the fair interests of</p> <p>4 your readers, you maintained impartiality between them?</p> <p>5 Is that what you're trying to tell us?</p> <p>6 A. Impartialities between ... sorry?</p> <p>7 Q. Mr Brown and Mr Blair.</p> <p>8 A. I'm sorry, I don't quite -- what is the question? That</p> <p>9 I ...?</p> <p>10 Q. That in fact you didn't take either person's side? You</p> <p>11 played this with an entirely neutral bat, or however you</p> <p>12 want to put it?</p> <p>13 A. It wasn't a playground spat. They were the</p> <p>14 Prime Minister and the Chancellor of the Exchequer. We</p> <p>15 were a newspaper who was looking after the real serious</p> <p>16 concerns of our readers, so it wasn't that we were --</p> <p>17 I would stand in one corner of the playground and</p> <p>18 Alan Rusbridger would stand on the other and it would be</p> <p>19 he was on Gordon's side and I was on Tony Blair's. It</p> <p>20 just didn't work like that. Every story, every feud,</p> <p>21 every, you know, mediation by John Prescott or Peter</p> <p>22 Mandelson at the time was analysed by the media in</p> <p>23 a just and proper way. So I just don't think you can</p> <p>24 couch it like that.</p> <p>25 Q. Is it true that in exchange for, generally speaking,</p> <p style="text-align: center;">Page 31</p>
<p>1 Q. You told us you were friends with Mr Blair. Was your</p> <p>2 relationship with Mr Brown at the same level? Were you</p> <p>3 friends with him?</p> <p>4 A. I was actually friends with Sarah Brown, his amazing</p> <p>5 lady, and -- that was the friendship. So probably not.</p> <p>6 Q. So you were more friendly with Mr Blair than you were</p> <p>7 with Mr Brown, weren't you?</p> <p>8 A. By the end, yes, but not at the beginning. Actually, as</p> <p>9 Mr Murdoch said in his testimony, he had a very warm</p> <p>10 relationship with Mr Brown and I would see him --</p> <p>11 I would see Gordon Brown quite regularly too.</p> <p>12 Q. But all the commentators say -- and we make come back to</p> <p>13 this -- that in relation to this feud, you took the side</p> <p>14 of Mr Blair and not Mr Brown. Did you or didn't you?</p> <p>15 A. I think you have to say which part of the feud. There</p> <p>16 were many, many elements to the feud. For example, in</p> <p>17 the famous curry house coup, I think we did in fact take</p> <p>18 Mr Blair's side because the country hadn't been -- was</p> <p>19 almost on ice because of the hostilities and I felt an</p> <p>20 injustice on behalf of our readers because policy wasn't</p> <p>21 getting through. But not always. No, not always.</p> <p>22 Q. But most of the time, Mrs Brooks?</p> <p>23 A. I think --</p> <p>24 Q. Can we agree on that that?</p> <p>25 A. I'm reluctant to agree to that because I'm not quite</p> <p style="text-align: center;">Page 30</p>	<p>1 supporting Mr Blair, the Sun would often be the first to</p> <p>2 receive scoops, or at least the stories the New Labour</p> <p>3 government and its spin doctors wished to put out?</p> <p>4 A. I'd like to think that we were the first to receive</p> <p>5 scoops, but I think that's down to Trevor Kavanagh and</p> <p>6 what a great political journalist he is and then Tom</p> <p>7 Newton Dunn, but we did get a lot of scoops.</p> <p>8 Q. They weren't fed to you, you think?</p> <p>9 A. Not all of them were particularly pleasant, so no.</p> <p>10 Q. Some of them were fed to you, though, weren't they?</p> <p>11 A. Well, Trevor and I had some good sources.</p> <p>12 Q. Those close to Mr Blair himself, those were your good</p> <p>13 sources, weren't they?</p> <p>14 A. As you said, you don't reveal your sources.</p> <p>15 Q. Okay. Look at the schedule of meetings with British</p> <p>16 prime ministers, which is RMB1.</p> <p>17 A. Would you know what tab that is in, sorry?</p> <p>18 Q. Yes.</p> <p>19 LORD JUSTICE LEVESON: Number 3.</p> <p>20 A. Thank you.</p> <p>21 MR JAY: Tab 3. You put in a revised version so --</p> <p>22 A. Have we? Okay.</p> <p>23 Q. I think we need to be absolutely clear about this.</p> <p>24 You're not putting this forward necessarily as</p> <p>25 100 per cent complete?</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 A. No.</p> <p>2 Q. Owing to the documents you've told us about, the</p> <p>3 existence only of a desk diary --</p> <p>4 A. It's not even my own desk diary, so ...</p> <p>5 Q. Some meetings may have been cancelled, some meetings may</p> <p>6 not have within included. So this should not be seen as</p> <p>7 other than indicative; is that the way you wish to put</p> <p>8 it?</p> <p>9 A. That's correct.</p> <p>10 Q. We know that from Alastair Campbell's diary that there</p> <p>11 was a dinner on 27 April 1997 -- you, your ex-husband,</p> <p>12 Mr Blair, Mr Campbell -- which was four days before the</p> <p>13 famous election of 1 May 1997. Do you recall that?</p> <p>14 A. Not particularly, but I'm sure it's correct. We were</p> <p>15 following Mr Blair's conference or last conference on</p> <p>16 education, or we were doing a big number on education in</p> <p>17 the paper. So I think it was to do with that, but</p> <p>18 I can't remember. Is it in Alastair's book? I'm</p> <p>19 sure --</p> <p>20 Q. Yes, page 733 of the first volume. Obviously you were</p> <p>21 going to be discussing what was then 99 per cent likely</p> <p>22 to happen, namely a huge victory for the Labour Party.</p> <p>23 Self-evident, isn't it?</p> <p>24 A. Well, this is 14 years ago. I know there was -- I know</p> <p>25 there was a meeting at an education rally, so it might</p> <p style="text-align: center;">Page 33</p>	<p>1 recollection of 2003 to 2007 than 1999, which is 13, 14</p> <p>2 years ago, so.</p> <p>3 Q. I was asking you about 2003 to 2007. Can you --</p> <p>4 A. Which --</p> <p>5 Q. I'm not asking you about a particular entry.</p> <p>6 A. Right.</p> <p>7 Q. I'm just asking whether a dinner with the Prime Minister</p> <p>8 in a restaurant might have been one-to-one, or would it</p> <p>9 always have been with someone else there?</p> <p>10 A. I think from in that period I, from memory, had about</p> <p>11 three dinners with Mr Blair on my own.</p> <p>12 Q. We see one dinner at the home of Matthew Freud and</p> <p>13 Elisabeth Murdoch. Again, if one reads material online,</p> <p>14 one would be led to believe that there were frequent</p> <p>15 occasions when Mr Blair went with you to the home of</p> <p>16 Mr Freud and Elisabeth Murdoch. Is that correct or not?</p> <p>17 A. No; once.</p> <p>18 Q. You can only remember one or you are sure there was only</p> <p>19 one?</p> <p>20 A. I'm sorry, I thought your question was that I took</p> <p>21 Mr Blair to the home of Matthew --</p> <p>22 Q. You were there on the same occasion. Whether you're</p> <p>23 taking him or not, I'm not sure --</p> <p>24 A. No, sorry, I will have seen Mr Blair probably much more</p> <p>25 since he left office in their company, but on occasion,</p> <p style="text-align: center;">Page 35</p>
<p>1 be the same -- one and the same thing.</p> <p>2 Q. Okay. When we see an entry such as "Tony Blair lunch",</p> <p>3 does that mean just Mr Blair or can it mean "and others</p> <p>4 present as well"?</p> <p>5 A. I would say that up until quite late in my editorship of</p> <p>6 the Sun, that most of those dinners will have been</p> <p>7 attended by political editor and particularly lunches</p> <p>8 would have been -- and all prime ministers do this to</p> <p>9 newspaper groups and senior cabinet visitors, is they</p> <p>10 come into the newsroom and sit down with the editor and</p> <p>11 the most senior executives and discuss issues of the</p> <p>12 day. So I think a lot of those would have been that</p> <p>13 format.</p> <p>14 Q. Dinners in restaurants? How does that work?</p> <p>15 A. You see --</p> <p>16 Q. Just Mr Blair or other people there?</p> <p>17 A. In 1999? I doubt that very much. But again, I'm sorry,</p> <p>18 that is literally what it says in the desk diary.</p> <p>19 I have probably better notes at News International, but</p> <p>20 I --</p> <p>21 Q. It's just your memory, Mrs Brooks, particularly if you</p> <p>22 look at the period 2003 to 2007. You'll have memories</p> <p>23 not of particular events but whether other people were</p> <p>24 there on occasion or not.</p> <p>25 A. I mean, like everybody, I'll probably have a better</p> <p style="text-align: center;">Page 34</p>	<p>1 yes, he was there.</p> <p>2 Q. Informally, spontaneously? Did that ever happen?</p> <p>3 A. No.</p> <p>4 Q. You say "on occasion". Can you give us a feel for the</p> <p>5 number of occasions when he was at the home of Matthew</p> <p>6 Freud and Elisabeth Murdoch when he was Prime Minister?</p> <p>7 A. I actually think quite few.</p> <p>8 Q. Quite a few?</p> <p>9 A. No, few. As in very few.</p> <p>10 Q. A handful then. Is that what you're telling us?</p> <p>11 A. Maximum, yes.</p> <p>12 Q. Can we look at the elections of 1997, 2001 and 2005 as</p> <p>13 of one piece. Was the support of your newspaper,</p> <p>14 whether it be the News of the World or the Sun -- I know</p> <p>15 you weren't editor in 1997 -- the subject of prior</p> <p>16 discussion with Mr Blair or his advisers?</p> <p>17 A. I have no idea for 1997. Not in 2001 that I can</p> <p>18 remember. But in 2005, it was a very difficult time for</p> <p>19 the Labour Party, and I think -- I am pretty sure it was</p> <p>20 Michael Howard who was leader of the opposition at that</p> <p>21 time, and so the Sun newspaper, at the time under my</p> <p>22 editorship, we were very even-handed during that</p> <p>23 election process, giving both equal weight to all party</p> <p>24 policies. So I'm not sure we particularly had</p> <p>25 a conversation with the Labour Party about access --</p> <p style="text-align: center;">Page 36</p>

9 (Pages 33 to 36)

<p>1 support.</p> <p>2 Q. In 2005, though, the Sun did support the Labour Party.</p> <p>3 That's a matter of record.</p> <p>4 A. That's right.</p> <p>5 Q. It changed, of course, in September 2009.</p> <p>6 A. Mm.</p> <p>7 Q. But the question was: was the fact of the Sun's support</p> <p>8 the subject of prior discussion with Mr Blair or his</p> <p>9 advisors?</p> <p>10 A. Not that I can remember, no. It wouldn't be -- it</p> <p>11 wouldn't be that way. In fact, I think in 2005 --</p> <p>12 again, it's very difficult. I wish I'd had some access</p> <p>13 to my notes, but I think in 2005 the Sun -- we left it</p> <p>14 right to the day, and I think we erected a sort of</p> <p>15 a Vatican-style chimney on the roof of Wapping and</p> <p>16 whatever coloured smoke -- sorry, it was funny at the</p> <p>17 time. It's clearly lost in translation now, but anyway,</p> <p>18 whatever smoke at the time came up. So we had red smoke</p> <p>19 and blue smoke.</p> <p>20 Q. You'd run out of yellow smoke? You made that note to</p> <p>21 the Select Committee.</p> <p>22 A. I'm not sure we could have found any yellow smoke at the</p> <p>23 time. We clearly would have needed it now. I think we</p> <p>24 left it to that minute. I remember being on the roof of</p> <p>25 Wapping and looking down and seeing all the press guys</p> <p style="text-align: center;">Page 37</p>	<p>1 Q. Okay. Just look at one particular article, which is</p> <p>2 tab 27 in this bundle we've prepared, which was the</p> <p>3 piece in the Sun in 2005. Do you remember this one,</p> <p>4 Mrs Brooks?</p> <p>5 A. Sorry, I'm just trying to -- yes, sorry, I have it now.</p> <p>6 Q. "Hopes dashed. News is crushing blow to Gordon Brown's</p> <p>7 chances of becoming prime minister."</p> <p>8 A. Is there a date on this?</p> <p>9 Q. No, there isn't because it's printed online.</p> <p>10 A. Right.</p> <p>11 Q. But it's printed in 2005.</p> <p>12 "Mr Blair has confided to close allies over the last</p> <p>13 two weeks that he intends to lead Labour for five more</p> <p>14 years and may even fight a fourth election."</p> <p>15 Was that piece the outcome of a conversation between</p> <p>16 you and Mr Blair?</p> <p>17 A. I think the byline will be Trevor Kavanagh, and as I --</p> <p>18 but it's not printed on here, and as I said, Trevor and</p> <p>19 I had some good sources, but I don't think it's fair to</p> <p>20 reveal who they were.</p> <p>21 Q. Well, I think you can tell me whether it was Mr Blair</p> <p>22 himself, whether he'd, as it were, planted this in the</p> <p>23 Sun with your help. Can you tell us that or not?</p> <p>24 A. I don't think I can tell you that at all.</p> <p>25 Q. Okay.</p> <p style="text-align: center;">Page 39</p>
<p>1 there waiting for the colour to come out. And --</p> <p>2 I didn't see Mr Blair standing there with them, though,</p> <p>3 waiting.</p> <p>4 Q. That wasn't the question. The question was a more</p> <p>5 straightforward one: was the Sun's support the subject</p> <p>6 of prior discussion --</p> <p>7 A. No, sorry, I keep thinking -- I keep saying the same</p> <p>8 thing. No, I don't remember having a prior discussion</p> <p>9 with him about it. But I think, if I'm correct in the</p> <p>10 2005 Vatican chimney, we didn't tell anyone, until we</p> <p>11 got to the roof of Wapping, what colour was coming out.</p> <p>12 Q. Did you at least make it clear to Mr Blair and his</p> <p>13 advisers before that election which aspects of Labour</p> <p>14 Party policy would be less or more acceptable to your</p> <p>15 readers?</p> <p>16 A. There was not a particular discussion about policy but</p> <p>17 it would be fair to say that leading up to the 2005</p> <p>18 General Election, there was a huge debate on the next</p> <p>19 stage of the European constitution and the Sun, the</p> <p>20 Daily Mail and, I think, the Telegraph were all</p> <p>21 campaigning quite hard to have a referendum put in the</p> <p>22 2005 manifesto. And so, yes, that would have been</p> <p>23 subject of discussion, you know, if there were any</p> <p>24 meetings pre the 2005 -- I'm not sure if there are any,</p> <p>25 but ...</p> <p style="text-align: center;">Page 38</p>	<p>1 A. Although I do remember this story, that -- I think some</p> <p>2 time in 2004 -- and this is going from memory --</p> <p>3 Gordon Brown had felt that he had come to an</p> <p>4 agreement -- I think this is in Andrew Rawnsley's book,</p> <p>5 I think -- an agreement that he would step down before</p> <p>6 the 2005 election, and at some point between that</p> <p>7 agreement in 2004, which I think was during the summer,</p> <p>8 when they all came back from recess, I think Tony Blair</p> <p>9 changed his mind and Trevor and I had heard about this</p> <p>10 and we asked everybody and we got that story.</p> <p>11 Q. It's also suggested that you passed on material,</p> <p>12 intelligence -- call it what you will -- gained from</p> <p>13 your few dinners with Gordon Brown -- you passed that on</p> <p>14 to Tony Blair. Is that true or not?</p> <p>15 A. Who suggested that, sorry?</p> <p>16 Q. It doesn't matter. In the same way as you're not</p> <p>17 telling me your source, I'm certainly not going to share</p> <p>18 mine with you. Is it true or not?</p> <p>19 A. Okay, we'll play that game all day. No, it isn't, and</p> <p>20 I think your source might be John Prescott. And it's</p> <p>21 not true.</p> <p>22 Q. Completely untrue, is it?</p> <p>23 A. Not true.</p> <p>24 Q. We can see from this schedule at RMB1 that you had much</p> <p>25 less contact with Mr Brown when he was Prime Minister</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 than you had had with Mr Blair when he was 2 Prime Minister. Would you agree? 3 <b>A. Well, he wasn't Prime Minister for very long, and in 4 2009, the Sun came out for the Tories and contact was 5 very limited after that.</b> 6 <b>Q. It stopped on 30 March 2009. There was a telephone 7 call, and that's the last contact you've recorded.</b> 8 <b>A. When, sorry? Can I just check that date?</b> 9 <b>Q. Yes, 30 March 2009. Do you see that one?</b> 10 <b>A. I can't, but anyway, I know -- I'm not sure that's true.</b> 11 <b>Q. Well, unless the diary is incomplete, it is true, isn't 12 it?</b> 13 <b>A. The diaries are very incomplete, and -- you know, I do 14 want to make this point. They are very incomplete. 15 I will have seen Gordon Brown between 30 March 2009 16 and -- I saw him at the Labour Party Conference 17 in September 2009, so -- but I -- and I remember at 18 least one occasion going to Downing Street. Again, I'm 19 sorry for these diaries that are incomplete, but they're 20 just my PA's desk diaries, so they perhaps won't have 21 everything in.</b> 22 <b>Q. But after 30 March 2009, the Sun was moving inexorably 23 towards supporting the Conservative Party, wasn't it?</b> 24 <b>A. I think the position at the Sun at the time was not an 25 overwhelming support for the Tory Party, but more that</b> Page 41 </p>	<p>1 LORD JUSTICE LEVESON: Could I just ask about one sentence 2 in what you've just said? Let me just find it. You 3 spoke of pursuing matters "on behalf of your readers". 4 I'm just wondering what you did to discover the views of 5 your readers, save for those that communicated with you. 6 In other words, if you have millions of readers, how are 7 you identifying their views or are you reading the runes 8 of what you believed the correct approach is, supported 9 by those who are vigorous enough to correspond with you 10 and taking that forward? I'm trying the find the 11 balance here. 12 <b>A. Yes, no, I think on Europe we -- on our European 13 campaign, which had been a long tradition at the Sun way 14 before I became editor but believed in it too -- on 15 particularly the European constitution, we had spent 16 probably since 2005 -- and the sentence that I said then 17 was in 2009 -- we were pretty sure of where our readers 18 stood on that matter. We'd had lots of polls that we'd 19 been done. We'd run petitions in the newspaper. 20 I think both the Mail and the Sun ran phone lines 21 saying, "Call in if you feel this promise should be kept 22 to about the referendum." So there was a lot of 23 feedback from the readers on that particular issue. 24 And on Afghanistan, I think it's fair, through our 25 Help for Heroes campaign, that we are considered to be</b> Page 43 </p>
<p>1 we had had a few major issues in which we had, on behalf 2 of our readers, particularly on Afghanistan, fallen out 3 with Gordon Brown's government, and I think around March 4 2009 -- it may have been a bit later -- I think that's 5 when Gordon Brown announced that the referendum that had 6 been many promised in the 2005 manifesto on the European 7 constitution, they were going to renege on that promise, 8 and again, I think it was the Mail and the Telegraph and 9 the Sun who -- particularly at the Sun, so I'll just 10 speak to the Sun -- called then for a snap election in 11 the autumn of 2009 because this referendum was 12 a hard-fought battle. The population by far wanted that 13 referendum on the European constitution, and so we had 14 fallen out with each other, but I still saw him from 15 that date. 16 <b>Q. Again, that wasn't really the question at all. By 17 30 March 2009, the Sun was moving inexorably towards 18 supporting the Conservative Party. Is that true or not?</b> 19 <b>A. Sorry, I thought I had said at the beginning, in answer 20 to that question, that I don't think that was quite the 21 way I would describe it, more that we were running out 22 of ways to support Mr Brown's government.</b> 23 <b>Q. Moving inexorably towards withdrawing its support for 24 the Labour Party. Could we agree on that formulation?</b> 25 <b>A. We could.</b> Page 42 </p>	<p>1 a very pro-armed forces paper and some of the failings 2 in Afghanistan, we were getting an incredible amount of 3 feedback on, not just from the troops on the ground but 4 also from the military here. So we had a pretty good 5 idea on those issues. 6 LORD JUSTICE LEVESON: Yes, I've found the sentence now. 7 You said: 8 "We had a few major issues on which we had, on 9 behalf of our readers ..." 10 I'm just wondering whether you are merely a conduit 11 or whether there is a fair amount of what is 12 Rebekah Brooks and/or Trevor Kavanagh and/or some others 13 that's thrown into the mix of deciding how you're going 14 to pursue the matter. 15 <b>A. I think every editor uses his or her own judgment in 16 putting together the paper and what stories or campaigns 17 we should follow and hopefully we get it right. But 18 that is -- it's an instinct but it's also -- and I refer 19 to it in my witness statement, and I don't know if it's 20 the same on other newspapers but we have a particular 21 close interaction with Sun readers. I mean, for the 22 last 11 years, every year I go on holiday on a £9.50 23 caravan park with Sun readers. I take all my executive 24 team. We go through their emails. The post room at the 25 Sun is sort of legendary. It's now an email room, or</b> Page 44 </p>

11 (Pages 41 to 44)



<p>1 inbox, but the letters that we get through them are</p> <p>2 always looked at. There's a great sort of culture at</p> <p>3 the Sun newsroom that the reader is always to be</p> <p>4 respected. I mean, it's almost a sackable offence to be</p> <p>5 rude to a reader. We get readers ringing us up asking</p> <p>6 for directions if they're lost somewhere. We have quite</p> <p>7 a close -- and I'm sure it's the same on other papers,</p> <p>8 but I remember when I moved from the News of the World</p> <p>9 to the Sun, it was one of the things that I noticed the</p> <p>10 difference in.</p> <p>11 MR JAY: Can I ask you about your social circle, I hope not</p> <p>12 intrusively. Is it fair to say that there was a close</p> <p>13 social circle in existence here: you, Wendi Murdoch,</p> <p>14 Elisabeth Murdoch, and at one stage Sarah Brown?</p> <p>15 A. We all knew each other, but we didn't meet as a group</p> <p>16 like that very often. In fact, I think probably once.</p> <p>17 Q. Okay. I'm doing this chronologically, so we're onto</p> <p>18 Mr Cameron now.</p> <p>19 LORD JUSTICE LEVESON: Is that convenient just to have five</p> <p>20 minutes?</p> <p>21 MR JAY: Yes.</p> <p>22 LORD JUSTICE LEVESON: All right.</p> <p>23 (11.09 am)</p> <p>24 (A short break)</p> <p>25 (11.21 am)</p> <p style="text-align: center;">Page 45</p>	<p>1 Q. Were you at all surprised?</p> <p>2 A. I'd already had the -- I wasn't surprised when he</p> <p>3 finally got the job because he'd called me with George</p> <p>4 Osborne, but --</p> <p>5 Q. At a slightly earlier stage, when you first heard of it,</p> <p>6 were you at all surprised that the Conservative Party</p> <p>7 wanted to appoint Mr Coulson?</p> <p>8 A. Not really. I mean, journalists are good communicators</p> <p>9 and Alastair Campbell went to the Mirror.</p> <p>10 Amanda Platell I think worked for William Hague, Iain</p> <p>11 Duncan Smith. So there's a long history of journalists</p> <p>12 going into politics, so it didn't occur to me this was</p> <p>13 any different.</p> <p>14 Q. I think your answer is: you weren't surprised at all?</p> <p>15 A. No.</p> <p>16 Q. The list of your meetings, which is RMB1. It's a list</p> <p>17 of meetings with members or leaders of political</p> <p>18 parties. Do you have that page, Mrs Brooks?</p> <p>19 A. Yes, I have, yes.</p> <p>20 Q. For the meeting at Santorini, Greece, which is the</p> <p>21 bottom of the first page of this list, you put an</p> <p>22 asterisk by it. You say you don't have a record of this</p> <p>23 meeting although you do recall meeting Mr Cameron while</p> <p>24 on holiday with the Murdoch family in Santorini, Greece,</p> <p>25 in 2008. That's why you've included it in the list, is</p> <p style="text-align: center;">Page 47</p>
<p>1 MR JAY: Mrs Brooks, we're onto Mr Cameron now. According</p> <p>2 to his biography, in 2005, you actually supported</p> <p>3 Mr Liam Fox for the Conservative leadership. Is that</p> <p>4 correct or not?</p> <p>5 A. I don't think that is correct. I can't -- I don't think</p> <p>6 the Sun came out for a particular candidate in the</p> <p>7 leadership. We probably didn't support Ken Clarke</p> <p>8 because of Europe, but I don't remember actually having</p> <p>9 a particular line in the paper for the leadership.</p> <p>10 Q. Okay. Mr Coulson is appointed Director of</p> <p>11 Communications in or about May 2007. Did you have any</p> <p>12 involvement in that event?</p> <p>13 A. No.</p> <p>14 Q. Can you recall when you first got to hear about it?</p> <p>15 A. Yes, I can. I think I've written it in my witness</p> <p>16 statement. I heard about it from Andy Coulson after he</p> <p>17 had met with George Osborne and I then was told by Andy</p> <p>18 again that he'd got the job.</p> <p>19 Q. What was your reaction to that piece of news?</p> <p>20 A. I probably said, "Well done."</p> <p>21 Q. That's what you said, but what was your reaction to it?</p> <p>22 How did you feel about it?</p> <p>23 A. Well, he'd had to resign from the News of the World and,</p> <p>24 you know, he'd found another job, a good job, so as</p> <p>25 a friend I was very pleased for him.</p> <p style="text-align: center;">Page 46</p>	<p>1 it?</p> <p>2 A. Yes.</p> <p>3 Q. Whose idea was it that Mr Cameron meet with the Murdochs</p> <p>4 in Greece on this occasion?</p> <p>5 A. I'm not sure who came up with the idea. I think it was</p> <p>6 borne out of the fact that Mr Murdoch --</p> <p>7 Mr Rupert Murdoch was in Europe that summer, and</p> <p>8 Mr Cameron was travelling to Europe, and I think the</p> <p>9 idea came up -- but it was organised through Number 10.</p> <p>10 Q. There must have been initiatives, though, within</p> <p>11 News International to make arrangements. Did you know</p> <p>12 anything about those?</p> <p>13 A. I knew he was coming, but I think the arrangements were</p> <p>14 made through Mr Murdoch's office and Number 10.</p> <p>15 Q. Were you consulted at all in relation to those</p> <p>16 arrangements?</p> <p>17 A. No.</p> <p>18 Q. You were there in Greece, presumably on holiday, with</p> <p>19 the Murdoch family and there was nothing more to it than</p> <p>20 that; is that right?</p> <p>21 A. Yes, it was for Elisabeth Murdoch's birthday.</p> <p>22 Q. And you presumably met with Mr Cameron on that occasion</p> <p>23 when he was in Greece, did you?</p> <p>24 A. I did, yes.</p> <p>25 Q. Do you remember how long he stayed?</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 A. I think it was an afternoon and an evening. I think 2 that's all.</p> <p>3 Q. Were you witness to any of the conversations which took 4 place, or not?</p> <p>5 A. Yes, I was witness to one with him and Mr Murdoch about 6 Europe, because we were in Europe. Very general terms. 7 But then he had subsequent other conversations where 8 I wasn't around.</p> <p>9 Q. So there were a number of conversations, possibly on 10 a number of topics. Is that the picture?</p> <p>11 A. Well, it wasn't a sort of formal sit-down conversation. 12 However, the one I was witness to was a sort – 13 I happened to be there when they were talking about 14 Europe. I was brought into the conversation because 15 they were talking about Europe.</p> <p>16 Q. Was this an occasion you were pleased about or not?</p> <p>17 A. Well, it seemed to – it was a very cordial meeting and 18 it went well. Like I say, it lasted for either an 19 afternoon or an evening, so it wasn't particularly long.</p> <p>20 Q. Because by that point you were quite friendly with 21 Mr Cameron, weren't you?</p> <p>22 A. Yes.</p> <p>23 Q. Because we know from your list that on new year's eve 24 2008, he attended a new year's eve party at your farm, 25 didn't he? Your husband's farm.</p> <p style="text-align: center;">Page 49</p>	<p>1 A. It will have done in general terms. I mean, there were 2 probably lots of other people there at the lunch, but 3 again, May 2009 – like I say, I'm not quite sure that 4 my memory's correct, but I'm pretty sure that the 5 European constitution debate was, shall we say, at 6 large, as was Afghanistan at the time. So they may have 7 been two of the issues.</p> <p>8 Q. We know that on 9 September 2009, Mr James Murdoch told 9 Mr Cameron at a drink at the George that the Sun would 10 support the Conservative Party at the next election. 11 The headline on the front page, I think, was on 12 30 September 2009.</p> <p>13 A. Mm-hm.</p> <p>14 Q. When did you first know that that shift would take 15 place?</p> <p>16 A. To the – to the Conservative party?</p> <p>17 Q. Yes. I've given you the date when Mr James Murdoch told 18 Mr Cameron that it would happen: 9 September 2009. When 19 did you first know that that shift would take place?</p> <p>20 A. Well, if we put aside the timing of it, I think probably 21 in the June 2009. Me and Rupert Murdoch and 22 James Murdoch had started to have discussions, because 23 I think by that stage – and that was post the reneging 24 on the referendum, it was post a campaign for a snap 25 election, and it was – I think one of my last front</p> <p style="text-align: center;">Page 51</p>
<p>1 A. Yes, but not at our home. It was my sister-in-law's 2 party.</p> <p>3 Q. So her home nearby; is that it?</p> <p>4 A. No, the point I was just trying to make was the Brooks 5 family had a family connection with the Camerons before 6 I came along, so I just wanted to make that distinction.</p> <p>7 Q. Is the distinction that Mr Cameron is only a friend of 8 the Brooks family, or are you accepting that Mr Cameron 9 became your friend?</p> <p>10 A. Yes. No, of course I'm accepting that.</p> <p>11 Q. Looking further down this list, 3 May 2009, lunch at the 12 home of James and Kathryn Murdoch. From that point, of 13 course, there's no evidence that you're meeting with 14 Mr Brown; is that fair? Although you did say that your 15 list may not be complete in relation to Mr Brown.</p> <p>16 A. I know my list isn't complete. I'm not sure – I'm sure 17 Gordon Brown and Tony Blair have had to release their 18 social and formal and informal meetings, haven't they? 19 With – and I'm pretty sure if they have, there will be 20 meetings at Downing Street with Mr Brown from that 21 period in May right up until September. I don't know 22 how many, though.</p> <p>23 Q. The topic of conversation on 3 May 2009. It's difficult 24 to remember any specific events, of course I understand, 25 but did it cover political issues?</p> <p style="text-align: center;">Page 50</p>	<p>1 pages that I edited of the Sun was "Don't you know 2 there's a bloody war on?" The point of it was there 3 didn't seem to be one senior politician, including the 4 Prime Minister, who was willing to address the issues 5 the military were facing out there, and so I think that 6 was around June –</p> <p>7 Q. You're moving off the question now. The question was 8 a simple one: when did you first know? You gave me the 9 answer. It was June 2009. You kindly expanded upon it. 10 There were conversations: you, the two Murdochs and 11 Mr Kavanagh. Is that is in a nutshell?</p> <p>12 A. Yes.</p> <p>13 Q. Was any part of the discussion about who was likely to 14 win the next election?</p> <p>15 A. I think back in June, the main discussion, which is why 16 I tried to give you a little bit of background, so you 17 could understand the context, was that it was more that 18 we had lost things to support Gordon Brown's government 19 on and what did that mean. So there were very initial 20 discussions in June.</p> <p>21 Q. When those discussions coalesced into a fixed position, 22 which must have arisen by 9 September 2009 by the 23 latest, was any part of the decision based on who was 24 likely to win the next election?</p> <p>25 A. I'm not sure what the polls were at the time. It was</p> <p style="text-align: center;">Page 52</p>

13 (Pages 49 to 52)

<p>1 much more, in that summer, about our readership and  2 where they stood in terms of the policies that the  3 Labour government — the bank bailout had been the year  4 before. The debt, the rising debt, so — the recession.  5 There were lots of issues that our readers were  6 concerned about, and like I say, the main point of  7 summer was the fact that we probably hadn't written one  8 editorial in support of the Labour government for quite  9 some time. So it wasn't as clearcut as — as the  10 question.  11 Q. I'm not saying it was. The question was: was any part  12 of the discussion related to who was likely to win the  13 next election?  14 A. Well, in general terms, it would have been, but not —  15 but only a part of it, because I can't remember what the  16 polls were at the time. I think the Tories were in the  17 lead then. But polls are polls.  18 Q. But from your perspective, if it's true that you're  19 mirroring the views of your readers, then by definition  20 you would be interested in how they were going to vote  21 at the next election. Do you see the logic of that?  22 A. I do, and the issue with the Sun, which I think is  23 probably one of the most interesting things about its  24 readership, is the amount of floating voters. So if  25 you're a Mirror reader or a Mirror journalist, you're</p> <p style="text-align: center;">Page 53</p>	<p>1 drink that you referred to that he had with  2 James Murdoch that it would happen, but absolutely not  3 on the timing.  4 Q. Can we see how specific we can be?  5 A. Mm-hm.  6 Q. Was he told that it would be within the party conference  7 season?  8 A. No. I don't think so.  9 Q. What was he told?  10 A. Well, I wasn't there at the drink that he had with  11 James Murdoch, but I think from — James Murdoch's own  12 evidence is that they had a discussion, which is: "This  13 is what the Sun will probably do."  14 The timing was a matter of discussion with me and  15 the editor of the Sun, Dominic Mohan, and the political  16 team there, and James and Rupert Murdoch. So the timing  17 conversation was not with David Cameron or his advisers.  18 Q. So the News International team, really from the top to  19 editorial level —  20 A. Yes.  21 Q. — with you in the middle as CEO, were responsible for  22 the timing of the decision; is that right?  23 A. In terms of the party conference season, yes.  24 Q. Did you play the major role here, Mrs Brooks?  25 A. I was certainly instrumental in it. I mean, ultimately,</p> <p style="text-align: center;">Page 55</p>
<p>1 pretty much tied to Labour —  2 Q. We know all this, Mrs Brooks.  3 A. Yes. So I think that in the Sun the floating voters are  4 quite important. So we would do internal polls and  5 research to where our readers were changing, but the  6 overwhelming feedback from the readership at that time  7 was that they were very unhappy with the lot they had.  8 Q. So we're back to the wider point, whether you are simply  9 the mirror of the opinion of your readers or whether you  10 have any influence at all on the formation of their  11 opinion, which may be a point I'll come back to you.  12 If you look at the list of meetings, there's also  13 a meeting, a dinner, with David Cameron, 21 January  14 2010, again at the home of James and Kathryn Murdoch.  15 Can you remember if anyone else was present?  16 A. I can't, I am afraid. There will have been other people  17 present, maybe people from the office. But not  18 particularly that one. I think we had one dinner where  19 there were some military chiefs there. I'm not sure if  20 that was the one.  21 Q. At that dinner, was there any discussion as to the  22 timing of the Sun's change of support?  23 A. No, we didn't tell anyone the timing.  24 Q. Did Mr Cameron at any stage know the timing?  25 A. Probably he knew it was within a period of time from the</p> <p style="text-align: center;">Page 54</p>	<p>1 Rupert Murdoch's the boss, but I was instrumental in it,  2 as was Trevor Kavanagh, Tom Newton Dunn and the editor,  3 Dominic Mohan.  4 Q. Final decision made by Rupert Murdoch, but you are the  5 driving force behind it, or not?  6 A. No, I was instrumental rather than the driving force.  7 It was pretty collective in terms of everyone's view,  8 particularly the readership's view, but everyone's view  9 that we were going to sort of distance ourselves from  10 the Labour Party that we'd supported for many years, but  11 as in terms of the timing, it was probably quite a small  12 group.  13 Q. And you were part of that small group?  14 A. Yes.  15 Q. Of course, the timing was careful inasmuch as it  16 succeeded Mr Brown's speech at that conference, didn't  17 it?  18 A. It did.  19 Q. And so designed, rightly or wrongly, to cause him  20 maximum political damage. Would you agree?  21 A. Well, the discussion on the timing was this, which is it  22 would be terribly unfair at the start of a party  23 conference to say that before hearing what Mr Brown and  24 the senior cabinet ministers had to say. For all we  25 knew, they could have come up with a fantastic policy</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 for Sun readers, some taxation – any -- I mean  2 anything. So I think it was unfair for us to go before.  3 Q. Are you seriously saying that Mr Brown might have said  4 something which caused you, the Sun, to change their  5 minds and go back to plan A?  6 A. No, I'm not seriously saying that. What I'm saying is  7 we felt it was unfair to cloud a party conference in  8 that way. So that was the reason for the timing not  9 being before. I think you heard from Mr Coulson  10 yesterday that the Conservative part, if they'd had  11 their way, they would have liked the endorsement at the  12 beginning of their conference. But the reason – the  13 main – the sole reason for – we knew it was going to  14 be – we absolutely were ready to do this in that party  15 conference season, but the reason for that night is  16 because Mr Brown's speech, which I can't remember how  17 long it lasted, but the key was that he spent less than  18 two minutes on Afghanistan, and we felt that was the  19 right timing in order to distance ourselves from –  20 Q. But you must have made this decision before you heard  21 his speech.  22 A. Oh, yes. I'm not --  23 Q. There was nothing in his speech which made a difference  24 to the timing, was there?  25 A. I was talking more about fairness rather than it was</p> <p style="text-align: right;">Page 57</p>	<p>1 Q. I mean individuals within the Labour Party as well. You  2 knew that, didn't you?  3 A. Well, yes.  4 Q. Did you sense in any way that this was the exercise of  5 power concentrated, if not in you personally, at least  6 in a small group of people within News International,  7 who of course you've named?  8 A. I think – I don't think we ever saw it in those terms,  9 no.  10 Q. But I'm asking you to think about it now and perhaps see  11 it in those terms.  12 A. But I don't think we've ever seen it in those terms.  13 Q. Why not?  14 A. Because rightly or wrongly, I believe and have believed  15 throughout my career that I was – my main  16 responsibility was to a readership, and that any  17 influence that we could come to bear on their behalf or  18 for their concerns was the most important thing, and  19 that's just the way it was. So I don't think we saw it  20 like that. Yes, in answer to your question, we knew  21 there would be certain individuals in the Labour Party  22 that would not be happy with that decision.  23 Q. This is a decision taken -- you've identified who took  24 it?  25 A. Yes.</p> <p style="text-align: right;">Page 59</p>
<p>1 going to affect the decision. I thought or we thought  2 it was fair not to do it at the beginning of their party  3 conference. They probably wouldn't see it like that,  4 but at the time it was thought to be the right thing.  5 Q. All these considerations, including, you say, the  6 consideration of fairness, are an indication of how  7 important this decision you were taking was. Would you  8 agree?  9 A. I think from the Sun's point of view it was an  10 incredibly important decision that the Sun made in 1997,  11 after many, many years of Tory support --  12 Q. Please just keep to the question, Mrs Brooks. The  13 question was about this decision in 2009.  14 A. Yes.  15 Q. Don't give us ancient history. Focus on this, please.  16 A. No, but ancient history is quite important in this  17 manner because I think you're asking for an explanation.  18 So I think that it was a very important decision and we  19 did give it careful consideration after many years of  20 Labour support.  21 Q. And you knew that the decision would anger certain  22 people, didn't you?  23 A. Well, the Labour Party.  24 Q. Well, obviously, Mrs Brooks.  25 A. Well, who did you mean then?</p> <p style="text-align: right;">Page 58</p>	<p>1 Q. Ultimate responsibility, Mr Rupert Murdoch.  2 Mr James Murdoch was a party to it. You were  3 instrumental, to use your term, and Mr Kavanagh was  4 there as well. Effectively it was those four people,  5 wasn't it?  6 A. And Mr Mohan, the editor.  7 Q. Yes. Was he contributing much to this debate or not?  8 A. Yes, he was.  9 Q. Five of you then, add him as well.  10 A. Yes.  11 Q. All five of you in different ways exercising  12 considerable power. Would you agree?  13 A. I think that we were -- the part of me, Mr Kavanagh and  14 Tom Newton Dunn, who was the political editor, and  15 Dominic Mohan, the journalists, I think we were all of  16 a mind that this was the right thing to do for the paper  17 and for our readership. We just didn't see it in those  18 terms, so I'm -- I'm sorry.  19 Q. You don't see the intrusion -- I'll use a different  20 word -- the dissemination of power from within a few  21 people capable of impacting on the opinions of many  22 people? You don't see that as being at least  23 a possibility?  24 A. Well, I can see how you can phrase it like that, and  25 many other critics do so too, but from your own</p> <p style="text-align: right;">Page 60</p>

15 (Pages 57 to 60)

<p>1 perspective, the Sun newspaper has in its history always 2 done sort of quite dramatic endorsements. It's like the 3 paper. It's strong, it's punchy. It tells it as it is. 4 When you reach an opinion, it's pretty obvious. And, 5 you know, from the Vatican chimney of smoke to Kelvin's 6 "Will the last person turn out the lights?", we have had 7 a tradition and a history of being bold and dramatic in 8 our timing when it came to politics. So we just didn't 9 see it in the terms that you're couching it at, although 10 I know that critics did. 11 Q. Mm. We know you had conversations with those close to 12 Mr Brown in relation to the decision. Before I ask you 13 about those, did you try to speak to Mr Cameron before 14 the headline went out? 15 A. No, I didn't. I was busy. 16 Q. Too busy to try and speak to him. Is that it? 17 A. My main concern was to try and speak to Mr Brown. 18 Q. Why was he a higher priority than Mr Cameron here? 19 A. Because I felt it was the right thing to do, to speak to 20 Mr Brown before anybody else. 21 Q. Out of what motive? 22 A. Well, I think general courtesy, but I thought it was the 23 right thing to do, and also Mr Brown and his wife were 24 due to come to the News International party that night 25 and I wanted to get hold of them beforehand.</p> <p style="text-align: center;">Page 61</p>	<p>1 A. I did have a conversation with Mr Brown, and I think it 2 was in October, rather than that night or that week. 3 Q. So within a week of the -- 4 A. No, I think it was a few weeks after. 5 Q. Why did it take you so long to speak to him? 6 A. Well, I had tried to speak to him on the night, and then 7 I'd spoken to Lord Mandelson instead, and it was clear 8 that there was nothing more to say at that point. 9 Q. Why? 10 A. I don't think he wanted to talk to me. 11 Q. So when you did speak to him eventually, can you 12 remember anything about that conversation? 13 A. I do. I remember it quite clearly because it was in 14 response to -- the Sun had splashed on a letter that 15 Gordon Brown had written to a bereaved mum whose son had 16 died in Afghanistan and he had got some spelling 17 mistakes and addressed the wrong name or something, but 18 the Sun had been particularly harsh to him over it, and 19 I spoke to him either that day or the next day, I can't 20 remember. 21 Q. What, at his instigation or yours? Can you recall? 22 A. He rang me. 23 Q. Can you remember anything about the conversation? 24 A. Yes, I can, because it was -- it was quite tense. 25 Q. Okay, so what was said then?</p> <p style="text-align: center;">Page 63</p>
<p>1 Q. Did you leave a series of voicemail and text messages on 2 the mobile phones of Mr Brown and Lord Mandelson? 3 A. I think "a series" is too strong a word. I left 4 a message for both of them, yes. 5 Q. For Mr Brown to speak to you urgently. Was that it? 6 A. Well, I certainly put a request earlier in the afternoon 7 to speak to him. Later in the afternoon, sorry. 8 Q. I know you've seen Lord Mandelson's account, but he 9 eventually did speak to you, didn't he? 10 A. Yes, he did. 11 Q. And there's a slight difference as to, I think, one word 12 which was used, which we'd better not go into. 13 A. What, the "chump" word? 14 Q. Yes. 15 A. That was what he claimed to have said, yes. 16 Q. Was he angry or not? 17 A. Well, depending on how you heard it, "chump" could be 18 quite an offensive word. So he seemed quite angry, but 19 not surprised. 20 Q. No, because, as you said, the tone of your coverage had 21 been unfavourable to the government for some time, 22 hadn't it? 23 A. Yes. 24 Q. Did you have any conversation with Mr Brown on or 25 shortly after 30 September 2009?</p> <p style="text-align: center;">Page 62</p>	<p>1 A. Well, it was a private conversation, but the tone of it 2 was very aggressive and, quite rightly, he was hurt by 3 the projection and the headline that had been put on the 4 story, and I think, also quite rightly in his defence, 5 he suspected or thought that this may be a way in which 6 the Sun was going to behave, and I assured him that it 7 wasn't, that it was a mistake, the headline was too 8 harsh and this was not the way the paper was going to 9 behave. 10 Q. But you were no longer the editor, of course, were you? 11 A. No, but I had spoken to the editor that morning, very 12 early on, when I saw the headline, and we had discussed 13 it at length and come to that conclusion. 14 Q. So you told Mr Mohan not to repeat that sort of thing, 15 did you? 16 A. I thought that Mr Brown's concerns that the Sun coverage 17 was going to be a personal attack was understandable and 18 I thought that would be wrong. 19 Q. That's what politicians fear most from the Sun, isn't 20 it, personal attack? And it's what the Sun has quite 21 often indulged in, would you agree? 22 A. No. 23 Q. This is a one-off, is it? 24 A. I think the fact that it resulted in such an 25 extraordinarily aggressive conversation between me and</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 Mr Brown shows that it actually doesn't happen all the</p> <p>2 time. I mean, I remember it very clearly for the nature</p> <p>3 of it and — no, sorry, I don't accept that.</p> <p>4 Q. But fear of personal attack from the Sun has been</p> <p>5 a factor in what politicians do or don't do. You well</p> <p>6 know that, Mrs Brooks, don't you?</p> <p>7 A. I think that Neil Kinnock may feel that about the Sun.</p> <p>8 But I'm not sure that the paper has been like that for</p> <p>9 a while.</p> <p>10 Q. For how long?</p> <p>11 A. I just don't think it concentrated on the personal — in</p> <p>12 the main. Occasionally, obviously, depending on the</p> <p>13 story, that would happen, but in the main, I think the</p> <p>14 Sun concentrated on the issues and the policy and the</p> <p>15 campaigns, rather than attacking just for the sake of</p> <p>16 personal attacks, and I think Mr Brown felt that letter</p> <p>17 was purely personal attack.</p> <p>18 Q. Fear of personal attack and a fear of allegedly holding</p> <p>19 politicians to account by prying intrusively into their</p> <p>20 personal lives. That has been part of the métier of the</p> <p>21 Sun, hasn't it?</p> <p>22 A. Obviously I'm going to object to "prying intrusively".</p> <p>23 The whole point that newspapers or the press in general,</p> <p>24 shall we say, hold politicians to account on occasion</p> <p>25 has been found to be intrusive, but that is not the</p> <p style="text-align: center;">Page 65</p>	<p>1 saying they're fearful of the leadership or the</p> <p>2 electoral.</p> <p>3 Q. This is a sort of recurring theme in what you're saying,</p> <p>4 that the roots here are the readership, it all flows up</p> <p>5 through the tree, which is you, and then emitted out,</p> <p>6 but you have no role in any of this?</p> <p>7 A. But the reader —</p> <p>8 Q. Is that right?</p> <p>9 A. I suppose that the point of me being here is to give the</p> <p>10 Inquiry some explanation of how the newspapers I edited</p> <p>11 worked, and it was true that the readership was at the</p> <p>12 very centre of that paper, and so going against that</p> <p>13 readership — that's why I'm saying that it's not</p> <p>14 a particular individual editor that has a power; it is</p> <p>15 the paper.</p> <p>16 Q. How one can test this: after you have a piece which some</p> <p>17 would say is personal — and we're talking about</p> <p>18 Mr Brown's piece — what happens? Does your inbox fill</p> <p>19 up with emails of approbation or is there a deathly</p> <p>20 silence? What happens? Can you help us?</p> <p>21 A. Well, in extreme circumstances, going over history,</p> <p>22 numbers of people can stop by the newspaper. In terms</p> <p>23 of that particular story, I think I — I wasn't on the</p> <p>24 paper at the time, so I think I do remember that being</p> <p>25 a negative reaction from the readers, although they felt</p> <p style="text-align: center;">Page 67</p>
<p>1 policy.</p> <p>2 Q. These are aberrations then? Is that what it amount to?</p> <p>3 A. I think that when a newspaper oversteps the line,</p> <p>4 that — I have heard criticism of papers that I have</p> <p>5 edited and others — that privacy is a hugely debated</p> <p>6 topic in every newsroom, but your question, your</p> <p>7 premise, was that this was the culture, and I was just</p> <p>8 disputing that.</p> <p>9 Q. I think as well it's also a manifestation of the power</p> <p>10 that the Sun and other high circulation newspapers can</p> <p>11 exercise, often through the personality of the editors.</p> <p>12 Would you accept that or not?</p> <p>13 A. Sorry, what was the question?</p> <p>14 Q. A manifestation of the power high circulation newspapers</p> <p>15 can exercise, often through the personality of their</p> <p>16 editors. It is the fear that if the politician departs</p> <p>17 from what the paper wants, there may be a personal</p> <p>18 attack.</p> <p>19 A. I — I don't think it's fair to say that politicians</p> <p>20 live in fear of newspapers. They are highly motivated,</p> <p>21 ambitious people, and MPs don't scare easily. So</p> <p>22 I don't think that's fair that they live in fear of</p> <p>23 power and because I believe that the power of a paper is</p> <p>24 its readership — I know, but that's what I believe, and</p> <p>25 that it's its readership — then that would be like</p> <p style="text-align: center;">Page 66</p>	<p>1 that, you know, the Prime Minister should probably take</p> <p>2 the time to spell the name of a grieving widow</p> <p>3 correctly, and certainly the bereaved son, and there was</p> <p>4 some sort of — overall, they felt that, you know, at</p> <p>5 least he'd taken the time to do it, and I think that's</p> <p>6 probably fair. It wasn't an overwhelming reaction but</p> <p>7 yes, you do get reactions.</p> <p>8 Q. The one extreme reaction, of course, was Hillsborough,</p> <p>9 but since then there's never been anything equivalent,</p> <p>10 has there? Where people actually voted with their feet</p> <p>11 and didn't buy the paper?</p> <p>12 A. And Princess Diana's death, actually.</p> <p>13 Q. Okay.</p> <p>14 A. For the majority — for a lot of newspapers, yes. So</p> <p>15 there have been other occasions.</p> <p>16 Q. Can I just go back to this conversation with Mr Brown.</p> <p>17 You said it was tense, he was angry. No doubt you say</p> <p>18 it was also a private conversation. I don't really want</p> <p>19 to lead you on this, if you understand me, but did he</p> <p>20 say anything which is relevant to this Inquiry,</p> <p>21 particularly in the context of evidence we've heard from</p> <p>22 Mr Murdoch?</p> <p>23 A. Sorry, what particular piece of evidence from</p> <p>24 Mr Murdoch?</p> <p>25 Q. Well, then I'm leading you. I just thought that putting</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 it in those terms you'd follow what I was referring to.</p> <p>2 You followed Mr Murdoch's evidence, did you?</p> <p>3 <b>A. I did follow Mr Murdoch's evidence. I think Mr Brown</b></p> <p>4 <b>was very angry, and I'm not sure there was anything</b></p> <p>5 <b>particularly relevant to this Inquiry, although when</b></p> <p>6 <b>Mr Murdoch relayed his conversation with Mr Brown –</b></p> <p>7 <b>I cannot remember when that was – Mr Murdoch also told</b></p> <p>8 <b>me the same story that he told you.</b></p> <p>9 Q. Okay, well that is of some assistance, but can we be</p> <p>10 clear: when did Mr Murdoch relay that conversation to</p> <p>11 you?</p> <p>12 <b>A. The reason I can't remember the timing is because</b></p> <p>13 <b>obviously I had my own rather angry and intense</b></p> <p>14 <b>conversation with Mr Brown. However, previous to that</b></p> <p>15 <b>conversation, I had also indirectly, again, had</b></p> <p>16 <b>similar – not threats made, but similar sort of veins</b></p> <p>17 <b>of reaction – sorry, similar sort of comments made</b></p> <p>18 <b>about the Sun abandoning Labour after 12, 13 years.</b></p> <p>19 <b>Hostile comments. So when Mr Murdoch told me his</b></p> <p>20 <b>conversation, it didn't surprise me.</b></p> <p>21 Q. What did Mr Murdoch tell you?</p> <p>22 <b>A. Exactly what he told the Inquiry.</b></p> <p>23 Q. And the conversation you had with Mr Brown, was that</p> <p>24 issue returned to or not?</p> <p>25 <b>A. It was – like I said, I feel that the content probably</b></p> <p style="text-align: center;">Page 69</p>	<p>1 harbour any such fear or concern; is that it?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Why not?</p> <p>4 <b>A. Because although Mr Brown had said those things to</b></p> <p>5 <b>Mr Murdoch and although I had heard similar insinuations</b></p> <p>6 <b>from others close to Mr Brown, that there was a sort of</b></p> <p>7 <b>a tone of threat about it, the fact is that it just</b></p> <p>8 <b>didn't occur to me that they were real or proper or –</b></p> <p>9 <b>I just – I would just dismiss them, I suppose.</b></p> <p>10 Q. Some would say that an elected government, either</p> <p>11 through executive power conferred on it by mandate or</p> <p>12 through Parliament in due course, would be quite</p> <p>13 entitled to bring in media policies which it thought to</p> <p>14 be in the public interest but which nonetheless did</p> <p>15 impact on the commercial interests of media companies.</p> <p>16 Would you agree?</p> <p>17 <b>A. I'm sure that it is absolute – of course it's proper</b></p> <p>18 <b>for all governments to debate and introduce regulation</b></p> <p>19 <b>and policy on the media. Of course I agree with that.</b></p> <p>20 Q. I'm just trying to explore your thinking in 2010. You</p> <p>21 have here Mr Brown allegedly, on your evidence, hostile</p> <p>22 to News International, and you have Mr Cameron, who</p> <p>23 isn't. Is that right? I'm not saying he's favourable</p> <p>24 to News International but he's certainly not hostile, is</p> <p>25 he?</p> <p style="text-align: center;">Page 71</p>
<p>1 was a private conversation, but the tone of it –</p> <p>2 unless, of course, Mr Brown would like to tell you about</p> <p>3 it, but he was incredibly aggressive and very angry.</p> <p>4 Q. It's relevant in this sense, Mrs Brooks. I doubt</p> <p>5 whether in the end this Inquiry will resolve questions</p> <p>6 of fine detail, but you were chief executive officer of</p> <p>7 News International. You might have been fearful that if</p> <p>8 Mr Brown did win at the next election, of course against</p> <p>9 the odds, he had it in his power to harm the interests</p> <p>10 of your company. Do you see that?</p> <p>11 <b>A. I don't accept it. I see the question, but I –</b></p> <p>12 Q. Which part don't you accept?</p> <p>13 <b>A. That I didn't think that.</b></p> <p>14 Q. So that obvious point didn't cross your radar at all,</p> <p>15 did it?</p> <p>16 <b>A. That at not any point in the conversation with Mr Brown</b></p> <p>17 <b>did I think: "If he wins, he will go against the</b></p> <p>18 <b>commercial interests of credit company"? He was just</b></p> <p>19 <b>incredibly aggressive and angry.</b></p> <p>20 Q. I'm sure it wasn't a thought which flashed through your</p> <p>21 mind during the conversation, but when you reflected on</p> <p>22 the conversation, it would immediately spring to mind,</p> <p>23 wouldn't it?</p> <p>24 <b>A. It didn't, no.</b></p> <p>25 Q. At no stage in the run-up to the 2010 election did you</p> <p style="text-align: center;">Page 70</p>	<p>1 <b>A. He wasn't hostile to the Sun.</b></p> <p>2 Q. No. It's just how this would weigh in your thinking.</p> <p>3 After all, you're the chief executive officer now.</p> <p>4 <b>A. Mm-hm.</b></p> <p>5 Q. So that's something that you should be thinking about.</p> <p>6 Wouldn't you agree?</p> <p>7 <b>A. It depends if you – I mean, Gordon Brown is – if you</b></p> <p>8 <b>accept the premise that Gordon Brown is a responsible</b></p> <p>9 <b>politician that doesn't put personal prejudice or</b></p> <p>10 <b>bitterness before his policy-making decisions – so if</b></p> <p>11 <b>you accept that premise, then the threats are pointless</b></p> <p>12 <b>and should be dismissed. However, if he's not that</b></p> <p>13 <b>person and he does put those things, then that's</b></p> <p>14 <b>a failing in his duty because it's not – it shouldn't</b></p> <p>15 <b>be about his personal prejudices. The Sun supported the</b></p> <p>16 <b>Labour Party for many, many years, and then decided to</b></p> <p>17 <b>make a change. So it didn't occur to me at the time</b></p> <p>18 <b>that Mr Brown and his colleagues would devote their time</b></p> <p>19 <b>in – into carrying out those threats.</b></p> <p>20 Q. Of course, it might have been part of the implied</p> <p>21 settlement between the Sun and the Labour Party, who,</p> <p>22 after all, were in power for 10 years, that the quid pro</p> <p>23 quo for support is that the Labour Party would not</p> <p>24 intrude into areas media policy which could harm the</p> <p>25 interests of News International and other similar</p> <p style="text-align: center;">Page 72</p>

18 (Pages 69 to 72)

<p>1 organisations. Did that thought process ever pass 2 through your mind? 3 <b>A. No.</b> 4 <b>Q. Okay. I'm going to come back to Mr Cameron. There's an</b> 5 <b>absence, isn't there, of text messages which might have</b> 6 <b>existed?</b> 7 <b>A. Yes, that is correct.</b> 8 <b>Q. Can we see, however, how far we get? It is said that he</b> 9 <b>texted you at certain times, up to a dozen times a day.</b> 10 <b>Is that true?</b> 11 <b>A. No, thankfully.</b> 12 <b>Q. Okay. A handful of times a day?</b> 13 <b>A. No. I mean, I have read this as well, 12 times a day.</b> 14 <b>I mean, it's preposterous. One would hope as leader of</b> 15 <b>the opposition or Prime Minister, he had better things</b> 16 <b>to do and I hope that as chief executive I did. I mean,</b> 17 <b>I would text Mr Cameron and vice versa, on occasion,</b> 18 <b>like a lot of people.</b> 19 <b>Q. Can you give us an idea of frequency?</b> 20 <b>A. Probably more -- between January 2010, maybe -- during</b> 21 <b>the election campaign, maybe slightly more, but on</b> 22 <b>average, once a week.</b> 23 <b>Q. The critical time, as you say, is the election campaign,</b> 24 <b>March to May 2010.</b> 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 73</p>	<p>1 <b>incredibly busy time -- I'd say probably about three or</b> 2 <b>four times.</b> 3 <b>Q. What comments, if any, did you make on his performance</b> 4 <b>in the television debates? Can you remember those?</b> 5 <b>A. Not a particular great length. I think, like everybody,</b> 6 <b>I felt the first one wasn't very good. That was it.</b> 7 <b>Q. Did you text the other two party leaders or not?</b> 8 <b>A. I didn't text Gordon Brown, no.</b> 9 <b>Q. No.</b> 10 <b>A. That would have been --</b> 11 <b>Q. Not evidently Mr Clegg either, from your demeanour?</b> 12 <b>A. No.</b> 13 <b>Q. Everybody wants to know how his texts are signed off.</b> 14 <b>Can you help?</b> 15 <b>A. In the main --</b> 16 <b>LORD JUSTICE LEVESON: Do I?</b> 17 <b>MR JAY: Well, you probably don't, actually, but if I don't</b> 18 <b>ask, people will enquire why the question wasn't asked.</b> 19 <b>LORD JUSTICE LEVESON: All right.</b> 20 <b>MR JAY: But I'm happy to be overruled, frankly.</b> 21 <b>A. What was the decision?</b> 22 <b>LORD JUSTICE LEVESON: Answer the question.</b> 23 <b>A. Oh right, sorry, sir. He would sign them off "DC" in</b> 24 <b>the main.</b> 25 <b>MR JAY: Anything else?</b></p> <p style="text-align: center;">Page 75</p>
<p>1 <b>Q. Can you give us an idea of frequency in relation to that</b> 2 <b>period?</b> 3 <b>A. Well, maybe twice a week.</b> 4 <b>Q. Can you assist us with the content of any of these text</b> 5 <b>messages?</b> 6 <b>A. Some, if not the majority, were to do with organisation,</b> 7 <b>so meeting up or arranging to speak. Some were about</b> 8 <b>a social occasion, and occasionally some would be my own</b> 9 <b>personal comment on perhaps the TV debates, something</b> 10 <b>like that.</b> 11 <b>Q. How often do you think you met with him socially during</b> 12 <b>this period? Let's take the first five months of 2010.</b> 13 <b>Ignore the record, because we agree --</b> 14 <b>A. No, I'm ignoring the record, but at least it gives me</b> 15 <b>a sort of memory refresh. Sorry, what was the period of</b> 16 <b>time?</b> 17 <b>Q. Let's just take the run-up to the 2010 election, which</b> 18 <b>was, I think, on 6 May 2010. I may be wrong about the</b> 19 <b>exact date. The four or five months before then.</b> 20 <b>A. Yes.</b> 21 <b>Q. How often would you meet with him or did you meet with</b> 22 <b>him socially?</b> 23 <b>A. I did meet with him between January 2010 and the</b> 24 <b>election. As you can see, I have no record of it, so --</b> 25 <b>I think we will have met about -- I mean, obviously it's</b></p> <p style="text-align: center;">Page 74</p>	<p>1 <b>A. Occasionally he would sign them off "LOL", "lots of</b> 2 <b>love", actually until I told him it meant "laugh out</b> 3 <b>loud", then he didn't sign them like that any more. But</b> 4 <b>in the main, "DC", I would have thought.</b> 5 <b>LORD JUSTICE LEVESON: Right. We've done that. Move on.</b> 6 <b>MR JAY: We'll move on, okay. Did he make or did you make,</b> 7 <b>rather, phone calls to his constituency home?</b> 8 <b>A. No, actually, no.</b> 9 <b>Q. Did you often pop around to each other's houses in south</b> 10 <b>Oxfordshire?</b> 11 <b>A. No, I think often popping around is definitely</b> 12 <b>overstating the case.</b> 13 <b>Q. How would you put it?</b> 14 <b>A. We occasionally met in the countryside if it was --</b> 15 <b>because I was there every weekend and he was there in</b> 16 <b>his constituency.</b> 17 <b>Q. It's also said -- and I think this is still in the</b> 18 <b>Times -- was there a meeting at the Heythrop</b> 19 <b>point-to-point ahead of which you texted each other to</b> 20 <b>make sure that you would not be seen together?</b> 21 <b>A. I just thought there might be a -- I have been to the</b> 22 <b>Heythrop point-to-point, because my husband is chairman,</b> 23 <b>and I think Mr Cameron has been too, because it's in his</b> 24 <b>constituency. Was the question did we meet there,</b> 25 <b>sorry?</b></p> <p style="text-align: center;">Page 76</p>

19 (Pages 73 to 76)



<p>1 Q. Did you text each other beforehand? Do you remember 2 that? 3 A. There have been many point-to-points over the years. 4 Well, it's annual. Was this a particular one? 5 Q. Can you remember this or not, Mrs Brooks? 6 A. Which -- 7 Q. A date has not been put on this. Of course it will be 8 an annual event. 9 A. Where did you say you read it, sorry? 10 Q. It was in the Times on Tuesday. 11 A. Oh, right. I did read that. It was a suggestion in the 12 Times that we -- both were at the same point-to-point 13 but we didn't meet up and there was some reason why that 14 was significant, but it is true that we didn't meet up. 15 I was there very briefly and I think -- but he did meet 16 up with my husband. 17 Q. Did you attend his private birthday party in October 18 2010? 19 A. Yes. 20 Q. Can I ask you these questions. Others have asked me to 21 put them. Did you have any communication with 22 Mr Cameron following the publication of the Guardian's 23 Milly Dowler hacking story, which was on 5 July 2011? 24 The communication would be about that story. 25 A. I'm sure we discussed it between July 2009 and July Page 77</p>	<p>1 but in the most general terms. Maybe in 2010, we had 2 a more specific conversation about it, which I think 3 is -- yeah, that's about right. 4 Q. Can you tell us about that one? 5 A. It was what I remember, rather than it being -- the 6 general terms of the story being around or what had 7 happened that day. I'm just very concerned because 8 you -- I thought you were warning me in -- 9 Q. Well, I don't know what you're going to say, Mrs Brooks, 10 but if it's a general conversation and it may relate 11 more to Mr Cameron's state of mind rather than any 12 underlying fact, I think you can probably tell us about 13 it. 14 A. No, I think it was nothing particularly that he wouldn't 15 have said publicly, but he was interested in the latest 16 developments and asked me about them and I said to him 17 what I say to everybody when they asked me for an update 18 on it. It was to do with the amount of civil cases 19 coming in around 2010 and we had a conversation about 20 it. I just particularly remember that. 21 Q. I think the context must be that he was concerned that 22 this went beyond Goodman and Mulcaire; is that fair, 23 without being any more specific than that? 24 A. Probably, yes. It was a general conversation with 25 the -- in late 2010 about the increase in the civil Page 79</p>
<p>1 2011. 2 LORD JUSTICE LEVESON: No, Mr Jay didn't ask about 2009. 3 A. Oh, sorry. 4 LORD JUSTICE LEVESON: He asked about 2011. In other words, 5 this is the story which came out of the Guardian, which 6 generated the -- 7 A. Right. No, I don't think I did have any direct 8 contact -- sorry, sir, yes, you're right -- on those 9 dates. 10 MR JAY: The other question, which in fact is the question 11 which I think you thought I was asking, but I am going 12 to ask it now: did you discuss the phone hacking 13 allegations against News International with Mr Cameron 14 at any time between the July 2009 Guardian story and 15 your departure from News International? 16 A. Yes, I did. 17 Q. I wouldn't want you to say anything which bears on the 18 current police investigations, you understand -- in 19 other words which relates to anybody in particular -- 20 but in general terms, can you assist us as to the 21 content of those discussions? 22 A. I think on occasion -- you know, not very often, so 23 maybe once or twice, because of the news and because, 24 you know, the phone hacking story was a sort of 25 a constant, or it kept coming up. We would bring it up, Page 78</p>	<p>1 cases. 2 Q. The increase in civil cases can only be an indication 3 that this phenomenon is not limited to Messrs Goodman 4 and Mulcaire, or at least that's a very strong 5 inference. Are we agreed about that, without being any 6 more precise than that? 7 A. I think News International has acknowledged that 8 publicly anyway, yes. 9 Q. Can you help us with what Mr Cameron said? 10 A. It was a couple of years ago. It was a general 11 discussion about -- I think he asked me what the update 12 was. I think it had been on the news that day, and 13 I think I explained the story behind the news. No 14 secret information, no privileged information; just 15 a general update. I'm sorry, I can't remember the date, 16 but I just don't have my records. 17 Q. You're focusing on what you told him, which I'm not 18 really interested in -- 19 A. Oh, right. 20 Q. -- with respect. I'm just concerned with what he might 21 have said. That's all. 22 A. I think he asked me -- I think it had been in the news 23 that day -- I think it was about the civil cases. Maybe 24 a new civil case had come out, and he asked me about it 25 and I responded accordingly. Page 80</p>

20 (Pages 77 to 80)

<p>1 Q. Was it related to his hiring of Mr Coulson and possibly 2 having second thoughts about that? 3 A. No, not in that instance, no. 4 Q. On any other instance? 5 A. No. 6 Q. Are you sure about that? 7 A. Yes. 8 Q. We're really in the dark then as to what these 9 conversations were about, apart from a general -- 10 A. Well, because they were very general. He -- they 11 weren't a sort of -- it was particularly around the 12 civil cases in 2010. Your question was: did we ever 13 speak about it in those two years, and my answer is: 14 yes, we did, very generally, but I do remember in late 15 2010 having a particular -- perhaps a more detailed 16 conversation, because if you go back in the chronology 17 of the phone hacking situation, that was when the civil 18 cases were coming in and being made newsworthy. 19 Q. Okay, can I just ask you about a different topic: the 20 role of the Freuds. We'll just touch on this. You've 21 been a close friend of Elisabeth Freud nee Murdoch for 22 over ten years; is that right? 23 A. Longer, actually, but yes. 24 Q. They have a country house in Oxfordshire as well, don't 25 they?</p> <p style="text-align: center;">Page 81</p>	<p>1 A. Are there no Liberal Democrats? No. Right. Yes, I can 2 see the list. 3 Q. Do you know if BSKyB is still a client of Freud 4 Communications? 5 A. I don't. I'm sure -- I mean, you know, Freud 6 Communications is a huge company. I don't know their 7 full client list. I'm pretty sure they haven't 8 represented BSKyB on a corporate level, but I'm sure 9 they will have represented lots of other areas of Sky. 10 I don't know currently, but probably. 11 Q. Can I just ask you some general questions about that 12 bid. When were you made aware that the bid would be 13 made? 14 A. I think before the public announcement, shortly before 15 the public announcement. 16 Q. Before the General Election or after, do you think? 17 A. I think it was before -- yeah, before. I actually can't 18 remember when the public announcement was, but it was 19 shortly before. 20 Q. This was obviously a big moment for News Corp. 21 I appreciate that you're CEO of News International and 22 not News Corp and that distinction is understood, but 23 were there not discussions with either of the Murdochs 24 about the timing of the bid? 25 A. I -- I played no formal role in the BSKyB transaction</p> <p style="text-align: center;">Page 83</p>
<p>1 A. Yes, they do. 2 Q. About how often have you been in the Freuds' home in the 3 country, your home in the country or the Camerons' 4 constituency home in the company of other politicians? 5 A. So just to distill that to make it easier to answer, how 6 many times I've been in David Cameron's home with other 7 politicians? 8 Q. Yes, or the Freuds' country home or your home. 9 Approximately. 10 A. I'm pretty sure never, David Cameron's home in the 11 countryside. I think once, maybe, George Osborne may 12 have been present at a dinner at my own and I think the 13 only time at Elisabeth Murdoch and Matthew Freud's house 14 was her 40th in -- a couple of years ago. 15 Q. Yes, the 40th party we've got under tab 40, haven't we? 16 It's the last tab. It was in August 2008. 17 A. Oh, sorry. 18 Q. It actually was held at somewhere called Burford Priory. 19 I don't know where that's it, although I detect it might 20 be in Oxfordshire. 21 A. It's in Burford. 22 LORD JUSTICE LEVESON: Well done. 23 MR JAY: We can see who was there. To be fair, a range of 24 politicians across all parties, but I don't spot many 25 Liberal Democrats.</p> <p style="text-align: center;">Page 82</p>	<p>1 and certainly not the strategy of timing and all that 2 kind of thing. I was made aware that it was on the 3 cards, so to speak, before the public announcement. 4 Maybe six weeks, a couple of months beforehand. 5 Q. Because it would obviously have knock-on effects for 6 News International as well, wouldn't it? 7 A. Well, not particularly, no. No. 8 Q. If News International had no interest in it, why were 9 you told about it? 10 A. It wasn't that we had no interest. Obviously, as part 11 of News Corp, we were interested, but at the time, the 12 way it was presented to me was -- I didn't think it was 13 going to have an effect on News International. 14 LORD JUSTICE LEVESON: You've said that you had no formal 15 role in the BSKyB bid, and I quite understand that, 16 because there's no reason why you should, but what about 17 informally? I mean, here, as we've been discussing, you 18 are extremely well connected to very, very senior 19 politicians across the range, and that's part of your 20 job, as you've described. Wouldn't your view as to how 21 it might work out, how it might play, be of extreme 22 value informally, not formally? 23 A. Extreme value to News Corp? 24 LORD JUSTICE LEVESON: To News Corp. To your ultimate boss, 25 to Mr Murdoch.</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 A. It was never quite put in those terms, but I did have an 2 informal role, as you suggest, mainly after the 3 formation of the -- if you want to call it this for 4 a better word -- the anti-Sky bid alliance, because that 5 directly in some ways brought News International into 6 what was a News Corp transaction because -- the anti-Sky 7 bid alliance was I think the BBC, the Guardian, the FT, 8 the Daily Mail, the Telegraph, British Telecom, 9 Independent -- well, everyone else probably, and once 10 they had formed that alliance and were using their own 11 news outlets to promote their view and also to lobby 12 politicians, then I suppose I probably did get involved, 13 but again, not in the deal or the transaction or the 14 strategy behind it.</p> <p>15 LORD JUSTICE LEVESON: No, it's not the deal or the strategy 16 behind it; it's perhaps the public presentation, perhaps 17 the way in which the criticisms could be countered, 18 perhaps using all your experience borne out of the 19 relationships you've been careful to develop for 20 professional reasons -- and doubtless coincidentally for 21 personal reasons -- over the years.</p> <p>22 A. I mean, I think in some circumstances that may be true, 23 but in this one it was a quasi-judicial decision and 24 I don't think my input or, as you say, using that was of 25 relevance. Obviously, in light of the anti-Sky bid</p> <p style="text-align: center;">Page 85</p>	<p>1 Q. If you could look at the list again of RMB1, the 2 meetings with prime ministers, and identify whether the 3 BSKyB bid was discussed on any relevant occasion. On 4 9 October 2010, there was dinner at Chequers with 5 Mr Cameron.</p> <p>6 A. Yes.</p> <p>7 Q. Might you have raised the bid on that occasion?</p> <p>8 A. No. I'm pretty sure that was his birthday party.</p> <p>9 Q. That's the private party we'd covered about 15 minutes 10 ago.</p> <p>11 A. I --</p> <p>12 Q. What about 23 December 2010, which we've already had 13 some evidence about?</p> <p>14 A. It was -- rather than discussed at that dinner, it was 15 mentioned and I think James Murdoch's testimony said 16 that, and I was aware that it was mentioned, but it was 17 not by any means widely discussed at that dinner. It 18 was mentioned because it was in the news because of -- 19 because obviously Dr Cable had resigned from that role.</p> <p>20 Q. Were you party to any conversations along the lines of: 21 "Dr Cable has acted in breach of duty. Let's hope the 22 next one, Mr Hunt, does not"?</p> <p>23 A. Not necessarily, but clearly that was our view, that we 24 hoped that having been always put to us that it would be 25 a very fair process and -- which, of course, we were</p> <p style="text-align: center;">Page 87</p>
<p>1 alliance lobbying, that I would waste no opportunity in 2 putting what was probably our case on the deal -- not 3 ours, News International, but ours, News Corp -- but 4 because of the nature of the decision, I'm not sure 5 I was of any -- it was of any value, particularly, apart 6 from a counter voice in a very large opposition.</p> <p>7 MR JAY: When were you first made aware of the code name 8 Rubicon? Can you recall?</p> <p>9 A. I think when I was -- I was told about it. I may have 10 heard it in the ether before, but I think I was told 11 what that was.</p> <p>12 Q. I'm sure you were aware when you were told about it, but 13 I asked when that was.</p> <p>14 A. Around the same time.</p> <p>15 Q. A few weeks before; is that it?</p> <p>16 A. No, maybe a couple of months before. Six, eight weeks 17 before.</p> <p>18 Q. Do you know who chose that code name?</p> <p>19 A. No, I don't, but I think it -- I think it might have 20 been James Murdoch, but I don't know that.</p> <p>21 Q. Obviously someone who enjoys classical allusions. Was 22 it a code name which anybody in government knew about?</p> <p>23 A. No, I don't think so.</p> <p>24 Q. Mr Osborne, Mr Hunt, did they know about it?</p> <p>25 A. No, I never heard them acknowledge that, no.</p> <p style="text-align: center;">Page 86</p>	<p>1 happy with, that it would be fair and democratic, to 2 find out that perhaps some personal prejudice had come 3 into that decision was quite disappointing, so it would 4 have been along those lines, yes, that at least now the 5 decision would be fair.</p> <p>6 Q. Fair or favourable, do you think?</p> <p>7 A. Fair.</p> <p>8 Q. You knew Mr Hunt quite well, didn't you?</p> <p>9 A. Not as well as others, no. I mean, I'd seen him 10 occasionally, but not particularly.</p> <p>11 Q. Even informally, you weren't putting out feelers, 12 soundings, to find out whether he'd be onside or not?</p> <p>13 A. I think he had -- I think he'd posted something on his 14 website saying that he was quite favourable earlier on 15 in the process, before he'd had the -- before the 16 decision went to him. I'm pretty sure that's --</p> <p>17 Q. So maybe you knew it anyway?</p> <p>18 A. Maybe I knew from then, but I don't -- but not from 19 a direct conversation with Mr Hunt.</p> <p>20 Q. People are also curious -- it may be nothing turns on 21 this, I don't know -- about a further occasion when you 22 may have met with Mr Cameron on Boxing Day 2010. Can 23 you enlighten us there, Mrs Brooks?</p> <p>24 A. Yes, no, it's -- I've been asked about it before.</p> <p>25 Mr Cameron attended a Boxing Day mulled wine, mince pie</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

<p>1 party at my sister-in-laws, and I popped in on my way to</p> <p>2 another dinner and I actually don't have any memory,</p> <p>3 because I don't think I did even speak to him or</p> <p>4 Samantha that night, but my sister-in-law tells me they</p> <p>5 were definitely there for the party, so I would have</p> <p>6 seen them, but not even to have a proper conversation.</p> <p>7 Q. So as to the scope of any conversation, which you say</p> <p>8 wasn't a proper conversation, are you sure it would not</p> <p>9 have covered the BSKyB issue?</p> <p>10 A. On?</p> <p>11 Q. Boxing Day.</p> <p>12 A. Definitely. Absolutely not. I mean, I don't think</p> <p>13 there was a conversation.</p> <p>14 Q. I will come back to certain aspects of BSKyB in due</p> <p>15 course, but I'd like to cover some general questions now</p> <p>16 about the subject matter of conversations with</p> <p>17 politicians, seeking to ignore, to the extent which one</p> <p>18 can, private and social matters. It's self-evident that</p> <p>19 your conversations with politicians would embrace the</p> <p>20 issues of the day; is that fair?</p> <p>21 A. Sometimes, yes.</p> <p>22 Q. Would they also embrace issues such as press regulation</p> <p>23 and media policy?</p> <p>24 A. Very rarely. I mean, there are some examples of when</p> <p>25 I have met with a politician particularly to discuss</p> <p style="text-align: center;">Page 89</p>	<p>1 A. Yes.</p> <p>2 Q. Because I think the last couple of years is in danger</p> <p>3 of --</p> <p>4 A. Overwhelming --</p> <p>5 Q. -- muddying the waters, and I want to speak for</p> <p>6 generally. Can you help us with that?</p> <p>7 A. Okay. I think after Operation Motorman and "What price</p> <p>8 privacy?", there was a sort of a general debate going on</p> <p>9 in the media in terms of -- particularly in 2003, which</p> <p>10 pretty much saw the end of the use of private</p> <p>11 detectives, certainly in the way that they had been for</p> <p>12 the last decade, and I think that that was something --</p> <p>13 Operation Motorman and "What price privacy now?" will</p> <p>14 have been discussed with the relevant politician at the</p> <p>15 time.</p> <p>16 I suppose press ethics particularly came up with</p> <p>17 Jack Straw. I know that Mr Les Hinton and Mr Murdoch</p> <p>18 MacLennan and Mr Dacre had spent some time, as well as</p> <p>19 the rest of the industry, discussing the Data Protection</p> <p>20 Act and in particular the custodial sentence assigned to</p> <p>21 journalists. I remember that being a big conversation</p> <p>22 with politicians and I probably only got involved in</p> <p>23 that again quite late on. So there was some discussion</p> <p>24 but not a great deal.</p> <p>25 Q. You were friends with Mr Blair. Mr Blair we know often</p> <p style="text-align: center;">Page 91</p>
<p>1 that, but they were very infrequent.</p> <p>2 Q. And the role of the BBC, was that often the subject or</p> <p>3 sometimes the subject of conversation?</p> <p>4 A. Not particularly. I mean, from my perspective, Sun</p> <p>5 readers are pretty pro-BBC. I think in general, wasting</p> <p>6 in any public sector or taxpayer's money was something</p> <p>7 that we would address with the BBC on occasions and</p> <p>8 others, but not in a sort of -- I never really had</p> <p>9 a conversation with a politician about the sort of</p> <p>10 top-slicing the licence fee or all that kind of -- just</p> <p>11 not ...</p> <p>12 Q. What about issues such as self-regulation of the press</p> <p>13 and the Press Complaints Commission? Were those ever</p> <p>14 discussed with politicians?</p> <p>15 A. Again, probably not enough, but no.</p> <p>16 Q. Why do you say "not enough"?</p> <p>17 A. Well, when you asked me the question, I was just</p> <p>18 reflecting on the fact that I couldn't remember</p> <p>19 a conversation with a politician where we did discuss</p> <p>20 the PCC, which is --</p> <p>21 Q. What about press ethics? Was that ever the subject of</p> <p>22 conversations with politicians?</p> <p>23 A. Well, obviously because of the last couple of years it</p> <p>24 has been the subject, but --</p> <p>25 Q. Can we go back before then?</p> <p style="text-align: center;">Page 90</p>	<p>1 felt that the Daily Mail was hostile to him and his</p> <p>2 wife. Was that something that he discussed with you?</p> <p>3 A. On occasion, yes.</p> <p>4 Q. Quite often, perhaps?</p> <p>5 A. Not quite often. It was probably more Cherie Blair that</p> <p>6 would discuss it with me.</p> <p>7 Q. I'm not interested in private discussions, but I'm</p> <p>8 interested in the wider picture of press ethics. What</p> <p>9 was the concern that was being conveyed to you in this</p> <p>10 context?</p> <p>11 A. Well, it wasn't, if you like, press ethics in its most</p> <p>12 altruistic form, but it was the tone. I think Cherie</p> <p>13 Blair was concerned that she felt a lot of her coverage</p> <p>14 was quite sexist, you know, but she's not the first</p> <p>15 high-profile female to think that about the UK media,</p> <p>16 and so that would come up on occasion. And she</p> <p>17 sometimes felt it was quite cruel and personal about her</p> <p>18 weight and that it sort of concentrated on those things</p> <p>19 rather than, in her eyes, her charity and the things</p> <p>20 that she was going to do. But I'm not sure that's what</p> <p>21 you're asking me because it's not really press ethics;</p> <p>22 it's more tone.</p> <p>23 Q. It may be part of the overall picture. We know that</p> <p>24 Mr Blair described the press as "feral beasts" in 2007.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 92</p>

23 (Pages 89 to 92)

<p>1 Q. Was that a discussion in like vein which he had with 2 you?</p> <p>3 A. No. Although I think that post Iraq, I think there was 4 some conversations about the 24-hour media, which is, 5 I think, what he was referring to, the sort of the fact 6 that we, the press, have become feral beasts because 7 there was always a constant need for a new story. So 8 occasionally 24-hour news was mentioned in terms of 9 Iraq, but not really. I was surprised when he said 10 that.</p> <p>11 Q. Well, his speech speaks for itself, but "feral beasts" 12 I think went further than just a temporal point, that 13 the press is there 24 hours a day. It's also to do with 14 the way they behave. Sometimes they're a bit wild and 15 off their leashes. Do you see the analogy?</p> <p>16 A. I see the analogy, yes.</p> <p>17 Q. He didn't communicate any of those concerns to you?</p> <p>18 A. No.</p> <p>19 Q. Did politicians ever complain to you privately about 20 coverage in the Sun of them?</p> <p>21 A. Yes, occasionally. You know, there was a -- if 22 people -- if someone felt it was unfair -- I mean, you 23 asked me a question earlier about -- I can't remember 24 how you phrased it, but if I had passed information from 25 Gordon Brown to Tony Blair, I think it was something</p> <p style="text-align: center;">Page 93</p>	<p>1 we can agree more or less where we are.</p> <p>2 A. Mm.</p> <p>3 Q. This may be the more important point: that in order to 4 get close to Mr Murdoch, in practice they had to get 5 close to you. Would you agree with that?</p> <p>6 A. No.</p> <p>7 Q. Why not?</p> <p>8 A. Because it's not true.</p> <p>9 Q. Would you agree that politicians might perceive that you 10 had influence over Mr Murdoch?</p> <p>11 A. No, I certainly don't think that, no. I think they -- 12 I was an editor of a newspaper, a very large circulation 13 newspaper, with a wide readership with an exceptional 14 percentage of floating voters, and I do believe that, 15 like other editors in similar situations, politicians 16 did want to get access to the editor of the Sun and his 17 or her team as much as possible. But I don't think that 18 people ever thought to get to Mr Murdoch they had to go 19 through me. I don't think that's correct.</p> <p>20 Q. Let's see if we can break that down. Politicians 21 certainly wanted to get close to you, to have access to 22 you, didn't they?</p> <p>23 A. Yes.</p> <p>24 Q. And you were someone who Mr Murdoch trusted implicitly, 25 were you not?</p> <p style="text-align: center;">Page 95</p>
<p>1 like that, and which I said wasn't true. There's plenty 2 of people doing that, but on occasion they would 3 complain. Tony Blair would often complain about our 4 attitude to Europe and him on Europe, regularly. Many, 5 many Home Secretaries would regularly complain about 6 campaigns or -- that we were doing in the paper. So 7 yes, they did. I think our role was -- I think that was 8 correct because our role was to hold them to account on 9 certain issues.</p> <p>10 Q. Okay. Some further general questions. Let's see if we 11 can analyse the power play which may or may not be in 12 issue here. It would be fair to say, wouldn't it, that 13 you were very close to Mr Rupert Murdoch, who trusted 14 you implicitly; are we agreed?</p> <p>15 A. I was close to him, yes.</p> <p>16 Q. And he trusted you implicitly --</p> <p>17 A. Yes.</p> <p>18 Q. Would you also agree that politicians, for whatever 19 reason, wanted to get close to Mr Murdoch to advance 20 their own interests? Are we agreed?</p> <p>21 A. I think that a lot of politicians wanted to put their 22 case to Mr Murdoch. "Advance their own interests" is 23 probably -- I'm sure most politicians have a higher view 24 of what they were doing, but yes.</p> <p>25 Q. I'm not suggesting this is wholly selfish, but I think</p> <p style="text-align: center;">Page 94</p>	<p>1 A. Yes. I hope so.</p> <p>2 Q. And that was well understood by any politician who cared 3 to look. Would we agree?</p> <p>4 A. Well, I think they thought we had a close working 5 relationship, yes.</p> <p>6 Q. Didn't you ever examine the motives or thought processes 7 of politicians, why they were wanting to get close to 8 you, and just, even as a piece of self-indulgence, 9 pondered to yourself: "Well, what's going on here? Why 10 are they trying to get close to me?"</p> <p>11 A. I think I always examined the ulterior motives of 12 politicians, but I thought it was pretty obvious that 13 they wanted to get to -- I don't know a politician that 14 would turn down a meeting with a senior journalist from 15 any broadcast or any newspaper. So it wasn't -- it 16 didn't need a lot of thinking that politicians wanted to 17 get access to journalists. I mean, that's been the same 18 case for decades, as you -- as you pointed out in your 19 opening statement in this module.</p> <p>20 Q. But you were in possession of the megaphone which would 21 be of utility to them, and which, if they had access to, 22 logically and self-evidently, might have influence over 23 your readership. That's the truth, isn't it?</p> <p>24 A. I think the politicians were very keen to put their case 25 to me and my team at the Sun because of the large</p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)

<p>1 readership of the Sun.</p> <p>2 Q. Did you regard it as part of your role -- or, if you</p> <p>3 didn't, perhaps it was an accidental by-product of your</p> <p>4 role as editor in particular -- to build up friendships</p> <p>5 with politicians?</p> <p>6 A. I think some friendships did occur, but I think it's</p> <p>7 important to put it in the context of friendships.</p> <p>8 I mean, we all have lots of different friendships. Old</p> <p>9 friends, new friends, work colleagues, associates. And,</p> <p>10 you know, through the decade that I was a national</p> <p>11 newspaper editor and the years I was CEO and the ten</p> <p>12 years I was a journalist, some friendships were made.</p> <p>13 But I don't think I ever forgot I was a journalist and</p> <p>14 I don't think they ever forgot they were a politician.</p> <p>15 Q. Did you not understand that you did have a degree of</p> <p>16 personal power over politicians?</p> <p>17 A. No. Again, I just didn't see it like that. I saw my</p> <p>18 role as editor of the Sun as a very responsible one and</p> <p>19 I enjoyed my job and every part of that job, but</p> <p>20 particularly, as I've said in my witness statement,</p> <p>21 I enjoyed campaigns and I enjoyed bridging a gap between</p> <p>22 public opinion and public policy, taking on concerns of</p> <p>23 the readers. So I don't accept it in the power terms</p> <p>24 that you keep describing it as.</p> <p>25 Q. But your real interest is people, isn't it, Mr Brooks?</p> <p style="text-align: center;">Page 97</p>	<p>1 whether there's any validity in that case study.</p> <p>2 A. Okay, right.</p> <p>3 Q. You remember the McCanns serialisation case?</p> <p>4 A. Yes, I do.</p> <p>5 Q. Actually, we have Dr McCann's evidence in relation to</p> <p>6 this in the bundle at page 57 under tab 6. Do you have</p> <p>7 that there? We're working from the transcript of the</p> <p>8 evidence this Inquiry received on 23 November 2011.</p> <p>9 A. Right, yes.</p> <p>10 Q. If you look at page 57, line 11, the question I asked</p> <p>11 was:</p> <p>12 "You talk about a meeting with Rebekah Brooks ..."</p> <p>13 Are you on the right page?</p> <p>14 A. They're not numbered in that way.</p> <p>15 LORD JUSTICE LEVESON: They are, actually.</p> <p>16 A. 57, is it? At the bottom?</p> <p>17 LORD JUSTICE LEVESON: No, it says 15 at the bottom, but</p> <p>18 each page has four pages on it.</p> <p>19 A. Yes, right. I have it, sorry. Thank you, sir. Yes?</p> <p>20 MR JAY: The question was:</p> <p>21 "You talk about a meeting with Rebekah Brooks which</p> <p>22 led to a review of your case, a formal review. Just to</p> <p>23 assist us a little bit with that, can you recall when</p> <p>24 that was?"</p> <p>25 Dr McCann's answer was:</p> <p style="text-align: center;">Page 99</p>
<p>1 You're a very empathetic person. You understand how</p> <p>2 human beings think and feel, don't you?</p> <p>3 A. I do like people, yes, and journalists, as a main, do</p> <p>4 try and be empathetic, otherwise no one would tell them</p> <p>5 anything.</p> <p>6 Q. But you understand the potential of, if I can put it in</p> <p>7 this way, personal alchemy, how you with get people to</p> <p>8 do or might get people to do what you want, and indeed</p> <p>9 what they are trying to do with you. Don't you get any</p> <p>10 of that?</p> <p>11 A. I'm not sure quite what you mean.</p> <p>12 Q. I'm not suggest anything sinister here. I'm talking</p> <p>13 about really the power of human empathy. Some people</p> <p>14 are empathetic and it's completely lost on them. But</p> <p>15 it's not lost on you, is it?</p> <p>16 A. Well, I hope to be empathetic in life to people, yes.</p> <p>17 Q. I just wonder whether you sense or sensed -- because</p> <p>18 we're talking about the past now -- the effect you might</p> <p>19 have had on politicians. Some of them may even have</p> <p>20 been afraid of you. Is that true?</p> <p>21 A. I literally -- like I say, I don't see politicians as</p> <p>22 these sort of easily scared people. Like I say, most of</p> <p>23 them are pretty strong, ambitious and highly motivated,</p> <p>24 so ...</p> <p>25 Q. Let's see if we can just take one case study and see</p> <p style="text-align: center;">Page 98</p>	<p>1 "I think it's probably worth just elaborating a</p> <p>2 little bit because it's quite a complex decision-making</p> <p>3 process. News International actually bid for the rights</p> <p>4 to the book along with HarperCollins, and one of their</p> <p>5 pitches was the fact that they would serialise the book</p> <p>6 across all their titles. We were somewhat horrified at</p> <p>7 the prospect of that, given the way we had been treated</p> <p>8 in the past and the deal was actually done with the</p> <p>9 publishers, Transworld, that excluded serialisation.</p> <p>10 "Now, we were subsequently approached by</p> <p>11 News International and Associated to serialise the book,</p> <p>12 and after much deliberation, we had a couple of meetings</p> <p>13 with the general manager and -- Will Lewis and</p> <p>14 Rebekah Brooks and others, and what swung the decision</p> <p>15 to serialise was News International committed to backing</p> <p>16 the campaign and the search for Madeleine."</p> <p>17 Pausing there, there was going to be serialisation</p> <p>18 in both the Sunday Times and the Sun, I believe. Do you</p> <p>19 recall that?</p> <p>20 A. I do.</p> <p>21 Q. I think this is the year 2010, by which time you were</p> <p>22 chief executive officer, weren't you?</p> <p>23 A. That's correct.</p> <p>24 Q. What was the price that you paid for the serialisation?</p> <p>25 Can you remember?</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 A. I can't remember, actually. I -- it's hundreds of 2 thousands of pounds. 3 Q. A million, we've been told. 4 A. No, it wasn't. It wasn't a million. Half a million, 5 maybe. I can't remember. I mean, I can -- there are 6 ways to find out, but I'm not sure it was a million. 7 Q. Okay. I paraphrase the rest of what Dr McCann said, 8 because he couldn't take this issue much further. Your 9 intervention was successful in securing a review of the 10 case. Do you understand that? 11 A. I -- you asked if it was successful and he says it was, 12 yes. 13 Q. Yes. Can you remember anything about that intervention? 14 A. Actually, to just go back, the reason I was involved as 15 chief executive was because it concerned two newspapers, 16 the Sunday Times and the Sun. So if you like, I did the 17 deal with HarperCollins from the corporate point of 18 view, and then left it to the two editors, John Witherow 19 and Dominic Mohan, to decide the different approaches. 20 I had always got on very well with Dr McCann and 21 Kate McCann throughout their incredible traumatic time, 22 and in fact I think they, if asked, would be very 23 positive about the Sun, actually, and in this case, 24 I thought that Dominic Mohan's idea to run the campaign 25 for this review of Madeleine's case by the Home Page 101</p>	<p>1 Q. Did you then take the matter up with Downing Street 2 direct? 3 A. No. 4 Q. Did you not tell Downing Street that the Sun was going 5 to demand a review and the Prime Minister should agree 6 to the request because the Sun had supported him at the 7 last election? 8 A. No, in fact I didn't speak to Downing Street or the Home 9 Secretary about this, but I know that Dominic Mohan or 10 Tom Newton Dunn will have spoken to them. 11 Q. Pardon me? 12 A. They would have spoken directly to either Number 10 or 13 the Home Office. I'm not sure. You'll have to ask 14 them. Probably the Home Office, I would have thought. 15 Q. That the Sun wanted an immediate result and that 16 a letter would be posted all over the front page from 17 the McCanns to the Prime Minister asking for a review, 18 unless Downing Street agreed. Did that happen? 19 A. I think that's how the Sun launched the campaign from 20 memory. It was with a letter, yes. 21 Q. The Home Secretary was told that if she agreed to the 22 review, the page 1 letter would not run. Do you 23 remember that? 24 A. No, I don't. 25 Q. But as the Secretary of State did not respond in time, Page 103</p>
<p>1 Secretary was the right thing for the Sun to do, and 2 I think the Sunday Times did the book. So my 3 intervention was at that point, as in: was the original 4 discussion with Dr McCann. I don't think I spoke to 5 Theresa May directly, but I am pretty sure that Dominic 6 Mohan may have done. 7 Q. Let's see whether we can agree or disagree on what may 8 have happened. When you were discussing the 9 arrangements with the McCanns, you asked if there was 10 anything more they wanted. Do you recall that? 11 A. Maybe, yes. 12 Q. And Dr Gerry McCann said that he wanted a UK police 13 review of the case. Do you remember him saying? 14 A. That I do, yes. 15 Q. Do you remember your answer being: "Is that all?" 16 A. I may have said it slightly more politely: "Is there 17 anything else before we conclude this meeting?", but -- 18 I don't particularly remember saying that, but maybe 19 I did, yes. 20 Q. I'm not suggesting to you that it was impolite; I'm just 21 summarising the gist of what you said. 22 A. Maybe, yes. We had been going through a list of issues 23 that Dr McCann and Kate McCann wanted to be assured of 24 before we went forward with the serialisation, so 25 possibly. Page 102</p>	<p>1 you did publish the letter on the front page. Do you 2 remember that? 3 A. I do remember the Sun kicking off the campaign with 4 a letter, yes. 5 Q. But you don't believe there was any conversation or 6 indeed threat to the Secretary of State? Is that right? 7 A. I'm pretty sure there would have not been a threat, but 8 you'll have to -- we'll have to ask Dominic Mohan, 9 because, like I said, my involvement was to discuss the 10 campaign in the continued search for Madeleine with the 11 McCanns and to do the deal on the book and to -- they -- 12 because I had done so many campaigns in the past, they 13 wanted my opinion, but after that I left it to both 14 editors to execute the campaign. 15 Q. What I've been told is that you then intervened 16 personally, Mrs Brooks. You told Number 10 that unless 17 the Prime Minister ordered the review by the 18 Metropolitan Police, the Sun would put the Home 19 Secretary, Theresa May, on the front page every day 20 until the Sun's demands were met. Is that true or not? 21 A. No. 22 Q. Is any part of that true? 23 A. I didn't speak to Number 10 or the Home Office about the 24 McCanns until, I think, after the campaign had been won, 25 and then it came up in a conversation that I had -- and Page 104</p>

26 (Pages 101 to 104)

1 I don't even think directly with the Prime Minister.  
 2 I think it was one of his team.  
 3 Q. We can find out in due course whether this is true or  
 4 not, but I must repeat it to you. It is said that you  
 5 directly intervened with the Prime Minister and warned  
 6 him that unless there was a review by the Metropolitan  
 7 Police, the Sun would put the Home Secretary,  
 8 Theresa May, on the front page every day until the Sun's  
 9 demands were met. Is that true or not?  
 10 A. I did not say to the Prime Minister: "I will put  
 11 Theresa May on the front page of the Sun every day  
 12 unless you give me a review." I did not say that. If  
 13 I'd had any conversations with Number 10 directly, they  
 14 wouldn't have been particularly about that, but they  
 15 would have been, if I'd been having a conversation, that  
 16 the Sun was leading a major campaign with a very strong  
 17 letter on page 1 to start the campaign, and anyone who  
 18 knew me would have talked to me — any politician would  
 19 have talked to me about it. But I did not say that.  
 20 I don't know who said I said that, but we're going back  
 21 to sources again.  
 22 LORD JUSTICE LEVESON: Could we ask this: were you part of  
 23 a strategy that involved your paper putting pressure on  
 24 the government with this sort of implied or express  
 25 threat?

Page 105

1 A. I was certainly part of a strategy to launch the  
 2 campaign in order to get the review for the McCanns,  
 3 yes. But I think the word "threat", sir, is — is too  
 4 strong.  
 5 LORD JUSTICE LEVESON: Well, give me another word then for  
 6 "threat", could you?  
 7 A. Persuade them?  
 8 LORD JUSTICE LEVESON: Persuasion. All right.  
 9 MR JAY: In your own words, Mrs Brooks, define for us what  
 10 the strategy was.  
 11 A. So the McCanns were deeply upset that there hadn't been  
 12 a review. It seemed incredibly unfair that they hadn't  
 13 got this review. You only have to read their book to  
 14 understand the trauma that they go through. So we said,  
 15 "We'll join forces with you", and Dominic Mohan and his  
 16 team went away and constructed a campaign. I cannot  
 17 remember when the idea of the letter came up. It may  
 18 have even been my idea to do the letter. I can't  
 19 remember. But the campaign was launched in order to try  
 20 and convince the government or convince the Home  
 21 Secretary that a review would be the right thing to do.  
 22 Q. Do you know how it came about that the review was  
 23 ordered?  
 24 A. No, I — I can't remember, I'm sorry. Such a lot has  
 25 happened since then, but —

Page 106

1 Q. You must have been told, Mrs Brooks?  
 2 A. I remember Dominic Mohan telling me that the review was  
 3 going ahead.  
 4 Q. That the Sun had won, in other words?  
 5 A. He didn't put it in those terms, but he said — well,  
 6 actually, I think he said, "The McCanns have won."  
 7 Q. The Sun headline on 14 May, front page, was that as  
 8 a result of its campaign, the Prime Minister was  
 9 "opening the Maddie files". Do you remember that one?  
 10 A. I remember the Sun winning the campaign, the McCanns  
 11 winning the campaign, yes.  
 12 Q. So this is not, you say, a case study then in the  
 13 exercise of power by you? I'm not suggesting that the  
 14 end result was right or wrong. Many would say it was  
 15 right, that there should be a review. I'm just saying  
 16 the means by which you achieved the objective --  
 17 A. But it could be said that a review of Madeleine McCann's  
 18 case, with everything that had gone on, was the right  
 19 thing to do. We presented the issue. We supported the  
 20 McCanns in their determination to get a review. It  
 21 wasn't new. They'd tried before, before the election,  
 22 and the election had come into — and the Sun — and the  
 23 Home Secretary clearly thought it was a good idea too,  
 24 because I'm pretty sure there wasn't — it wasn't a long  
 25 campaign. It wasn't like Sarah's Law over ten years.

Page 107

1 I think it was very short.  
 2 Q. Yes, it didn't take very long because the government  
 3 yielded to your pressure, didn't they? It took all of  
 4 about a day.  
 5 A. Or perhaps they were convinced by our argument.  
 6 Q. There are always two sides to the coin here, that of  
 7 course everybody would say, on one level, money should  
 8 be spent, but the campaign to date, I'm told, has cost  
 9 £2 million and some would say maybe that money might  
 10 have gone somewhere else. It's never clearcut, is it?  
 11 A. What, the Madeleine McCann campaign?  
 12 Q. No, the operation which started up the review, which was  
 13 called Operation Grange, I understand.  
 14 A. Right, sorry.  
 15 Q. Perhaps you would say all you were doing was reflecting  
 16 the views of your readers. Is that it?  
 17 A. I think in that case, it was an issue that we brought to  
 18 the readers, that we explained to the readers that  
 19 a review hadn't taken place and that — we presented the  
 20 McCanns' story as in the reason why they wanted the  
 21 review. I think that absolutely chimed with our  
 22 readership and the campaign was started with a very  
 23 heartfelt letter and the politicians were convinced our  
 24 argument, or the McCanns' argument, was correct.  
 25 Q. It also chimes with the commercial interests of your

Page 108

27 (Pages 105 to 108)



<p>1 papers because this sells copy, doesn't it?</p> <p>2 A. Well, campaigns can sell newspapers. I think the</p> <p>3 serialisation of the book actually was good for</p> <p>4 circulation for the Sunday Times. I'm not sure how well</p> <p>5 the campaign was in circulation terms, but they would be</p> <p>6 a matter of record. It may have been.</p> <p>7 Q. Can I deal, finally before lunch, with one other example</p> <p>8 just to get your evidence on this. Mr Dominic Grieve at</p> <p>9 one point was the Shadow Home Secretary, wasn't he?</p> <p>10 A. Yes, he was.</p> <p>11 Q. Do you remember a conversation with him over dinner</p> <p>12 which you discussed the Human Rights Act?</p> <p>13 A. I do, yes.</p> <p>14 Q. To cut to the quick, his position was in favour of the</p> <p>15 Act and your position was not, if one wanted to distill</p> <p>16 it into one sentence; is that correct?</p> <p>17 A. I don't think that's quite right. Similar. His</p> <p>18 position was that it was — it was a shadow cabinet</p> <p>19 dinner, and his position was that David Cameron's</p> <p>20 promise or, shall we say, the Tory Party's promise to</p> <p>21 repeal the HRA and replace it with a British bill of</p> <p>22 rights, I think was the plan at the time, was not —</p> <p>23 should not be so easily promised to papers like the Sun</p> <p>24 and the Mail and the Telegraph, and so it wasn't that he</p> <p>25 was pro it or against it. He was just making the legal</p> <p style="text-align: center;">Page 109</p>	<p>1 seriously, and as it turned out, he was entirely</p> <p>2 correct.</p> <p>3 Q. Did you give any advice to Mr Cameron as to whether</p> <p>4 Mr Grieve might move on?</p> <p>5 A. No, no. In fact, after that conversation — sorry, it</p> <p>6 is important to remember Mr Cameron wasn't at that</p> <p>7 dinner.</p> <p>8 Q. That's right. Did you indicate to Mr Cameron in any way</p> <p>9 what your view was about Mr Grieve?</p> <p>10 A. No. In fact, Mr Osborne and Mr Cameron did the opposite</p> <p>11 to me, where they were at pains to explain that</p> <p>12 Mr Grieve's view, which has now proved to be entirely</p> <p>13 correct, was absolutely not their view and they were</p> <p>14 going to repeal the HRA and replace it with a British</p> <p>15 bill of rights, and that Mr Grieve was mistaken.</p> <p>16 LORD JUSTICE LEVESON: Just before we break, could I take</p> <p>17 you back to this issue that we've bounced around several</p> <p>18 times, which is who is leading who.</p> <p>19 A. Yes.</p> <p>20 LORD JUSTICE LEVESON: Do you think that at least in part,</p> <p>21 what you were in fact doing, to use your own words, was</p> <p>22 bringing issues to your readers as opposed merely to</p> <p>23 responding to your readers' interests?</p> <p>24 A. I think that's correct, yes.</p> <p>25 LORD JUSTICE LEVESON: I'm sure we'll come back to it this</p> <p style="text-align: center;">Page 111</p>
<p>1 point that it was very difficult to do.</p> <p>2 Q. Were you impressed with him after that conversation?</p> <p>3 A. Well, as it turned out, he was absolutely right, but at</p> <p>4 the time — it was more his colleagues around the table,</p> <p>5 because I think they'd put out a policy announcement</p> <p>6 that it was going to be in the manifesto they would</p> <p>7 repeal the HRA. David Cameron had written for the Sun</p> <p>8 explaining this. And so the dinner conversation was</p> <p>9 quite heated, as he was the only one at the table</p> <p>10 saying, "Actually ..." I admired him standing up to his</p> <p>11 shadow colleagues like that, and as I say, in the end</p> <p>12 he's turned out to be correct.</p> <p>13 Q. Didn't you tell Mr Cameron, after that conversation you</p> <p>14 had with Mr Grieve, words to this effect: "You can't</p> <p>15 have someone like that as Home Secretary. He won't</p> <p>16 appeal on our readers. Move him"? And that's indeed</p> <p>17 what happened.</p> <p>18 A. No, I did not tell Mr Cameron to move him. What — the</p> <p>19 conversation — as I say, it was a very heated</p> <p>20 conversation, borne out by — his colleagues were trying</p> <p>21 to almost silence him at the table because he was, in</p> <p>22 effect, saying one of the promises the Conservatives had</p> <p>23 made to the electorate was they were going to repeal —</p> <p>24 and it was almost the opposite way around, that they</p> <p>25 were concerned that his view was not to be taken</p> <p style="text-align: center;">Page 110</p>	<p>1 afternoon, but I would like your view, which you can</p> <p>2 reflect upon, on this: everybody's entitled to be</p> <p>3 a friend of whomsoever they want to be a friend. That's</p> <p>4 part of life. But can you understand why it might be</p> <p>5 a matter of public concern that a very close</p> <p>6 relationship between journalists and politicians might</p> <p>7 create subtle pressures on the press, who have the</p> <p>8 megaphone, and on the politicians, who have the policy</p> <p>9 decisions?</p> <p>10 A. Yes, I can understand that.</p> <p>11 LORD JUSTICE LEVESON: All right. 2 o'clock.</p> <p>12 (1.02 pm)</p> <p>13 (The luncheon adjournment)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 112</p>

28 (Pages 109 to 112)

<b>A</b>	afraid 54:16 98:20 afternoon 49:1 49:19 62:6,7 112:1 age 22:5 aged 2:3 aggressive 64:2 64:25 70:3,19 ago 14:4 28:8 33:24 35:2 80:10 82:14 87:10 agree 8:21 13:5 17:15 28:9 30:24,25 41:2 42:24 56:20 58:8 60:12 64:21 71:16,19 72:6 74:13 94:18 95:1,5,9 96:3 102:7 103:5 agreed 80:5 94:14,20 103:18,21 agreement 40:4 40:5,7 ahead 76:19 107:3 Alan 31:18 Alastair 3:11,13 25:14 27:17,19 29:23 33:10 47:9 Alastair's 33:18 alchemy 98:7 allegations 78:13 alleged 19:18 allegedly 2:19 65:18 71:21 alliance 85:4,7 85:10 86:1 allies 39:12 allusions 86:21 altruistic 92:12 Amanda 47:10 amazing 30:4 ambitious 66:21 98:23 amount 10:10 18:7 44:2,11 53:24 66:2 79:18 analogy 93:15,16 analyse 28:4 29:25 94:11 analysed 31:22 analysing 28:3 ancient 58:15,16 Andrew 40:4 Andy 46:16,17 and/or 44:12,12 anger 58:21 angry 62:16,18 68:17 69:4,13	70:3,19 announced 42:5 announcement 2:9 83:14,15 83:18 84:3 110:5 annual 77:4,8 answer 28:8 42:19 47:14 52:9 59:20 75:22 81:13 82:5 99:25 102:15 antipathy 27:3 anti-Sky 85:4,6 85:25 anybody 61:20 58:8 60:12 78:19 86:22 anyway 37:17 41:10 80:8 88:17 apart 15:18 81:9 86:5 appeal 110:16 applied 9:2 apply 8:24,25 appoint 47:7 appointed 1:25 2:1 9:10 11:14 21:14 46:10 appointment 2:9 9:6,8 18:20 21:19 25:14 appointments 3:14,19 appreciate 83:21 approach 43:8 approached 100:10 approaches 101:19 approbation 67:19 appropriates 15:21 approximately 4:9,16 82:9 April 33:11 areas 10:5,6 72:24 83:9 arguably 27:14 argument 108:5 108:24,24 arisen 52:22 arrangements 48:11,13,16 102:9 arranging 74:7 arrested 19:17 article 39:1 aside 51:20 asked 5:17 21:12 23:10 29:7 40:10 75:18 77:20 78:4 79:16,17 80:11	80:22,24 86:13 88:24 90:17 93:23 99:10 101:11,22 102:9 asking 35:3,5,7 45:5 58:17 59:10 78:11 92:21 103:17 aspects 38:13 89:14 assault 19:18 assigned 91:20 assist 6:9 74:4 78:20 99:23 assistance 69:9 Associated 100:11 associates 97:9 assumes 14:14 assured 64:6 102:23 asterisk 47:22 attack 64:17,20 65:4,17,18 66:18 attacking 65:15 attacks 65:16 attempt 1:20 attend 77:17 attended 22:15 34:7 49:24 88:25 attitude 13:10 17:22,25 94:4 August 82:16 automatic 29:23 autumn 42:11 average 73:22 aware 9:14,20 83:12 84:2 86:7,12 87:16	BBC 10:22 85:7 90:2,7 bear 59:17 bearing 2:16 bears 78:17 beasts 92:24 93:6 93:11 becoming 39:7 beginning 4:24 21:23 30:8 42:19 57:12 58:2 behalf 26:25 30:20 42:1 43:3 44:9 59:17 behave 64:6,9 93:14 beings 98:2 believe 13:24 18:19,23 35:14 59:14 66:23,24 95:14 100:18 104:5 believed 43:8,14 59:14 believer 11:4 bereaved 63:15 68:3 best 3:17 26:8 better 20:14 29:5 34:19,25 62:12 73:15 85:4 beyond 79:22 bid 83:12,12,24 84:15 85:4,7 85:25 87:3,7 100:3 big 10:13 13:3 18:14 26:8,9 33:16 83:20 91:21 bigger 14:16 biggest-selling 14:2 bill 11:10 29:13 109:21 111:15 biography 46:2 birth 19:23 birthday 19:21 20:23 21:8,13 48:21 77:17 87:8 bit 6:16 20:6,9 42:4 52:16 93:14 99:23 100:2 bitterness 72:10 BlackBerry 4:2 4:8,11,16.5:12 5:13,19 Blair 7:2 21:3,6 23:21 24:9,20 25:5 27:14,18 27:19 28:14,19 28:23 29:11,15	30:1,6,14 31:2 31:7 32:1,12 33:12 34:2,3 34:16 35:11,15 35:21,24 36:16 37:8 38:2,12 39:12,16,21 40:8,14 41:1 50:17 91:25,25 92:5,13,24 93:25 94:3 Blair's 25:16 28:7,20 29:2,8 30:18 31:19 33:15 blocked 4:5,7 bloody 52:2 blow 39:6 blue 37:19 bold 61:7 book 33:18 40:4 100:4,5,11 102:2 104:11 106:13 109:3 books 25:20 29:6 borne 3:2 48:6 85:18 110:20 boss 56:1 84:24 bottom 47:21 99:16,17 bounced 111:17 Boxing 88:22,25 89:11 breach 87:21 break 45:24 95:20 111:16 breakfast 20:5 bridging 97:21 briefly 77:15 bring 71:13 78:25 bringing 111:22 British 11:10 14:10 32:15 85:8 109:21 111:14 broadcast 14:21 96:15 broadly 7:25 Brooks 1:4,7,9 1:10,20 2:22 3:23 6:16 15:13 19:4 28:6 29:21 30:22 34:21 39:4 44:12 46:1 47:18 50:4,8 54:2 55:24 58:12,24 65:6 70:4 77:5 79:9 88:23 97:25 99:12,21 100:14 104:16 106:9 107:1 brought 49:14 85:5 108:17	Brown 7:4 27:16 28:19,23 29:9 29:11,14 30:2 30:4,7,10,11 30:14 31:7 40:3,13,25 41:15 42:5 45:14 50:14,15 50:17,20 56:23 57:3 61:12,17 61:20,23 62:2 62:5,24 63:1 63:15 65:1,16 68:16 69:3,6 69:14,23 70:2 70:8,16 71:4,6 71:21 72:7,8 72:18 75:8 93:25 Brown's 29:2 39:6 42:3,22 52:18 56:16 57:16 64:16 67:18 BSkyB 83:3,8,25 84:15 87:3 89:9,14 build 97:4 bundle 39:2 99:6 bunting 7:5 Burford 82:18 82:21 bus 16:23 business 22:15 busy 61:15,16 75:1 buy 68:11 byline 39:17 by-product 97:3
		<b>B</b>		<b>C</b>		
abandoning 69:18 aberrations 66:2 abilities 27:8 able 6:9 11:25 24:2 abound 19:13 absence 3:4 22:14 73:5 absolute 71:17 absolutely 9:20 11:6 26:19 32:23 55:2 57:14 89:12 108:21 110:3 111:13 abused 27:4 accept 13:6 14:1 14:25 65:3 66:12 70:11,12 72:8,11 97:23 acceptable 38:14 accepting 50:8 50:10 access 3:25 8:5 25:19 26:11 36:25 37:12 95:16,21 96:17 96:21 accidental 97:3 account 4:4 5:9 26:18,22,24 62:8 65:19,24 94:8 accounts 5:3,4 achieved 107:16 acknowledge 86:25 acknowledged 80:7 Act 11:4,7 91:20 109:12,15 acted 87:21 add 60:9 adding 16:24 address 52:4 90:7 addressed 63:17 addressing 14:14 16:11 adjournment 112:13 admired 110:10 advance 94:19 94:22 advice 111:3 advisers 25:5,16 36:16 38:13 55:17 advisors 37:9 affect 58:1 Afghanistan 42:2 43:24 44:2 51:6 57:18 63:16	back 5:21 8:7,17 8:20 11:12 23:21 26:15 28:10,13 30:12 40:8 52:15 54:8,11 57:5 68:16 73:4 81:16 89:14 90:25 101:14 105:20 111:17 111:25 background 8:16 52:16 backing 100:15 bailout 53:3 balance 43:11 bank 53:3 based 52:23 basically 22:3 basing 14:9 bat 31:11 battle 42:12	30:1,6,14 31:2 31:7 32:1,12 33:12 34:2,3 34:16 35:11,15 35:21,24 36:16 37:8 38:2,12 39:12,16,21 40:8,14 41:1 50:17 91:25,25 92:5,13,24 93:25 94:3 Blair's 25:16 28:7,20 29:2,8 30:18 31:19 33:15 blocked 4:5,7 bloody 52:2 blow 39:6 blue 37:19 bold 61:7 book 33:18 40:4 100:4,5,11 102:2 104:11 106:13 109:3 books 25:20 29:6 borne 3:2 48:6 85:18 110:20 boss 56:1 84:24 bottom 47:21 99:16,17 bounced 111:17 Boxing 88:22,25 89:11 breach 87:21 break 45:24 95:20 111:16 breakfast 20:5 bridging 97:21 briefly 77:15 bring 71:13 78:25 bringing 111:22 British 11:10 14:10 32:15 85:8 109:21 111:14 broadcast 14:21 96:15 broadly 7:25 Brooks 1:4,7,9 1:10,20 2:22 3:23 6:16 15:13 19:4 28:6 29:21 30:22 34:21 39:4 44:12 46:1 47:18 50:4,8 54:2 55:24 58:12,24 65:6 70:4 77:5 79:9 88:23 97:25 99:12,21 100:14 104:16 106:9 107:1 brought 49:14 85:5 108:17	cabinet 25:5 34:9 56:24 109:18 Cable 87:19,21 call 40:12 41:7 111:14 called 42:10 47:3 82:18 108:13 calls 76:7 Cameron 5:18 5:22 7:6,11 8:10 21:3,6 45:18 46:1 47:23 48:3,8 48:22 49:21 50:7,8 51:9,18 54:13,24 55:17 61:13,18 71:22 73:4,17 76:23 77:22 78:13 80:9 87:5 88:22,25 110:7 110:13,18 111:3,6,8,10 Camerons 50:5 82:3			

<b>Cameron's</b> 79:11 82:6,10 109:19 <b>camp</b> 29:11,11 <b>campaign</b> 43:13 43:25 51:24 73:21,23 100:16 101:24 103:19 104:3 104:10,14,24 105:16,17 106:2,16,19 107:8,10,11,25 108:8,11,22 109:5 <b>campaigned</b> 11:7 <b>campaigning</b> 38:21 <b>campaigns</b> 44:16 65:15 94:6 97:21 104:12 109:2 <b>Campbell</b> 3:13 27:18,19 29:23 33:12 47:9 <b>Campbell's</b> 25:14 33:10 <b>Campbell-type</b> 3:11 <b>cancelled</b> 33:5 <b>candidate</b> 46:6 <b>capable</b> 60:21 <b>caravan</b> 44:23 <b>cards</b> 84:3 <b>care</b> 2:23 <b>cared</b> 96:2 <b>career</b> 1:20 59:15 <b>careful</b> 56:15 58:19 85:19 <b>carrying</b> 72:19 <b>case</b> 11:10 76:12 80:24 86:2 94:22 96:18,24 98:25 99:1,3 99:22 101:10 101:23,25 102:13 107:12 107:18 108:17 <b>cases</b> 79:18 80:1 80:2,23 81:12 81:18 <b>cause</b> 56:19 <b>caused</b> 57:4 <b>celebrity</b> 10:10 10:15,17,19,22 <b>cent</b> 32:25 33:21 <b>centre</b> 67:12 <b>CEO</b> 2:7 55:21 83:21 97:11 <b>certain</b> 17:18,19 25:16 58:21 59:21 73:9 89:14 94:9 <b>certainly</b> 17:8	40:17 55:25 62:6 68:3 71:24 84:1 91:11 95:11,21 106:1 <b>cetera</b> 13:11 <b>chairman</b> 76:22 <b>chancellor</b> 6:21 31:14 <b>chances</b> 39:7 <b>change</b> 25:18 54:22 57:4 72:17 <b>changed</b> 37:5 40:9 <b>changes</b> 26:9 <b>changing</b> 16:6 54:5 <b>charity</b> 92:19 <b>Charlie</b> 27:17 29:23 <b>check</b> 41:8 <b>checking</b> 28:2 <b>Chequers</b> 87:4 <b>Cherie</b> 92:5,12 <b>chief</b> 21:14 70:6 72:3 73:16 100:22 101:15 <b>chiefs</b> 54:19 <b>chimed</b> 108:21 <b>chimes</b> 108:25 <b>chimney</b> 37:15 38:10 61:5 <b>chose</b> 86:18 <b>chronologically</b> 23:21 45:17 <b>chronology</b> 81:16 <b>chump</b> 62:13,17 <b>circle</b> 45:11,13 <b>circuit</b> 18:7 <b>circulation</b> 14:5 66:10,14 95:12 109:4,5 <b>circulations</b> 14:24 <b>circumstances</b> 67:21 85:22 <b>City/Manchester</b> 15:3 <b>civil</b> 79:18,25 80:2,23,24 81:12,17 <b>claim</b> 23:22 <b>claimed</b> 62:15 <b>Clarke</b> 46:7 <b>clash</b> 15:4 28:18 <b>class</b> 13:11 18:1 <b>classical</b> 86:21 <b>clear</b> 2:7,16 3:8 3:10 24:19 28:8 32:23 38:12 63:7 69:10 <b>clearcut</b> 53:9 108:10	<b>clearly</b> 37:17,23 63:13 65:2 87:23 107:23 <b>Clegg</b> 75:11 <b>client</b> 83:3,7 <b>close</b> 8:11 19:12 28:12 32:12 39:12 44:21 45:7,12 61:11 71:6 81:21 94:13,15,19 95:4,5,21 96:4 96:7,10 112:5 <b>cloud</b> 57:7 <b>coalesced</b> 52:21 <b>code</b> 86:7,18,22 <b>coin</b> 108:6 <b>coincidentally</b> 85:20 <b>colleagues</b> 72:18 97:9 110:4,11 110:20 <b>collective</b> 15:10 56:7 <b>colour</b> 23:3 38:1 38:11 <b>coloured</b> 37:16 <b>columnists</b> 10:11 <b>come</b> 11:12 14:10,12 30:12 34:10 38:1 40:3 54:11 56:25 59:17 61:24 64:13 73:4 80:24 88:2 89:14 92:16 107:22 111:25 <b>coming</b> 8:7 26:2 38:11 48:13 78:25 79:19 81:18 <b>comment</b> 25:21 74:9 <b>commentary</b> 29:6 <b>commentators</b> 30:12 <b>comments</b> 69:17 69:19 75:3 <b>commercial</b> 70:18 71:15 108:25 <b>commiseration</b> 6:2 <b>commiserations</b> 7:1 <b>Commission</b> 90:13 <b>committed</b> 3:10 24:19 100:15 <b>committee</b> 8:17 9:4 37:21 <b>communicate</b> 93:17 <b>communicated</b>	8:13 43:5 <b>communication</b> 77:21,24 <b>communications</b> 8:17 46:11 83:4,6 <b>communicators</b> 47:8 <b>companies</b> 71:15 <b>company</b> 27:8 35:25 70:10,18 82:4 83:6 <b>complain</b> 93:19 94:3,3,5 <b>Complaints</b> 90:13 <b>complete</b> 3:15 5:24 32:25 50:15,16 <b>completely</b> 2:16 20:12 40:22 98:14 <b>complex</b> 100:2 <b>compressed</b> 5:22 <b>compromised</b> 27:10 <b>computer</b> 24:24 <b>concentrated</b> 59:5 65:11,14 92:18 <b>concern</b> 61:17 71:1 92:9 112:5 <b>concerned</b> 53:6 79:7,21 80:20 92:13 101:15 110:25 <b>concerns</b> 17:2 31:16 59:18 64:16 93:17 97:22 <b>conclude</b> 102:17 <b>conclusion</b> 64:13 <b>conduit</b> 44:10 <b>conference</b> 24:9 33:15,15 41:16 55:6,23 56:16 56:23 57:7,12 57:15 58:3 <b>conferred</b> 71:11 <b>confided</b> 39:12 <b>confidential</b> 20:15 <b>confirm</b> 1:17 5:2 <b>confused</b> 28:15 <b>connected</b> 84:18 <b>connection</b> 50:5 <b>conscious</b> 2:24 <b>Conservative</b> 11:8 41:23 42:18 46:3 47:6 51:10,16 57:10 <b>Conservatives</b> 110:22 <b>considerable</b>	60:12 <b>consideration</b> 58:6,19 <b>considerations</b> 58:5 <b>considered</b> 12:20 43:25 <b>constant</b> 25:6 26:20,23 27:4 78:25 93:7 <b>constituency</b> 76:7,16,24 82:4 <b>constitution</b> 38:19 42:7,13 43:15 51:5 <b>constraints</b> 2:16 3:2 <b>constructed</b> 106:16 <b>consulted</b> 48:15 <b>contact</b> 5:11 14:11,12 18:5 18:15 24:4 25:1 40:25 41:4,7 78:8 <b>contacts</b> 18:8 24:16 <b>contain</b> 5:25 <b>contained</b> 4:12 <b>content</b> 1:17 5:23 69:25 74:4 78:21 <b>context</b> 2:18 11:13 52:17 68:21 79:21 92:10 97:7 <b>continue</b> 22:3 <b>continued</b> 104:10 <b>contrast</b> 13:17 <b>contributing</b> 60:7 <b>control</b> 8:19 <b>convenient</b> 45:19 <b>conversation</b> 13:15 15:2,2,4 15:6 36:25 39:15 49:11,14 50:23 55:17 62:24 63:1,12 63:23 64:1,25 68:16,18 69:6 69:10,14,15,20 69:23 70:1,16 70:21,22 79:2 79:10,19,24 81:16 88:19 89:6,7,8,13 90:3,9,19 91:21 104:5,25 105:15 109:11 110:2,8,13,19 110:20 111:5 <b>conversations</b> 49:3,7,9 52:10	61:11 81:9 87:20 89:16,19 90:22 93:4 105:13 <b>conveyed</b> 92:9 <b>convince</b> 106:20 106:20 <b>convinced</b> 108:5 108:23 <b>copy</b> 109:1 <b>cordial</b> 49:17 <b>corner</b> 31:17 <b>Corp</b> 24:9 83:20 83:22 84:11,23 84:24 85:6 86:3 <b>corporate</b> 83:8 101:17 <b>correct</b> 2:11 5:6 5:10 10:1 13:21 20:24,25 25:25 26:5 33:9,14 35:16 38:9 43:8 46:4 46:5 51:4 73:7 94:8 95:19 100:23 108:24 109:16 110:12 111:2,13,24 <b>correctly</b> 68:3 <b>correspond</b> 43:9 <b>cost</b> 108:8 <b>couch</b> 31:24 <b>couching</b> 61:9 <b>Coulson</b> 18:4,9 46:10,16 47:7 57:9 81:1 <b>Coulson's</b> 18:6 <b>counter</b> 86:6 <b>counteract</b> 27:15 27:24 <b>countered</b> 85:17 <b>country</b> 14:3 19:9,11 30:18 81:24 82:3,3,8 <b>countryside</b> 76:14 82:11 <b>coup</b> 30:17 <b>couple</b> 6:14 22:16 80:10 82:14 84:4 86:16 90:23 91:2 100:12 <b>course</b> 2:19 5:4 37:5 50:10,13 50:24 56:15 59:7 64:10 68:8 70:2,8 71:12,17,19 72:20 77:7 87:25 89:15 105:3 108:7 <b>courtesy</b> 61:22 <b>cover</b> 4:24 50:25 89:15 <b>coverage</b> 62:20	64:16 92:13 93:20 <b>covered</b> 87:9 89:9 <b>create</b> 112:7 <b>credit</b> 70:18 <b>critical</b> 73:23 <b>criticism</b> 66:4 <b>criticisms</b> 85:17 <b>critics</b> 60:25 61:10 <b>cross</b> 70:14 <b>crossed</b> 27:2 <b>cruel</b> 92:7 <b>crushing</b> 39:6 <b>cultural</b> 9:15 11:2 13:10 <b>culture</b> 45:2 66:7 <b>curious</b> 88:20 <b>current</b> 78:18 <b>currently</b> 83:10 <b>curry</b> 30:17 <b>custodial</b> 91:20 cut 109:14  <b>D</b> <b>Dacre</b> 91:18 <b>Daily</b> 14:8 25:15 38:20 85:8 92:1 <b>damage</b> 56:20 <b>danger</b> 27:4 91:2 <b>dark</b> 81:8 <b>dashed</b> 39:6 <b>Data</b> 91:19 <b>database</b> 10:9 <b>date</b> 19:23 24:14 39:8 41:8 42:15 51:17 74:19 77:7 80:15 108:8 <b>dated</b> 1:14,15 <b>dates</b> 2:8 78:9 <b>David</b> 54:13 55:17 82:6,10 109:19 110:7 <b>day</b> 4:7 14:11 17:5 19:6 23:14 34:12 37:14 40:19 63:19,19 73:9 73:12,13 79:7 80:12,23 88:22 88:25 89:11,20 93:13 104:19 105:8,11 108:4 <b>days</b> 33:12 <b>DC</b> 75:23 76:4 <b>deal</b> 85:13,15 86:2 91:24 100:8 101:17 104:11 109:7 <b>death</b> 68:12 <b>deathly</b> 67:19 <b>debate</b> 15:8 38:18 51:5
---	--	---	--	--	---	---

58:6	flashed 70:20	30:6 49:20	going 11:3,9,16	<b>H</b>	61:7 67:21	identified 59:23
fallen 42:2,14	flavour 3:18	friends 30:1,3,4	19:7 21:9 22:5	hacking 77:23	hold 26:17,22,23	identify 1:12
family 19:25	flew 24:9	91:25 97:9,9	26:13,22 33:21	78:12,24 81:17	61:25 65:24	87:2
47:24 48:19	floating 53:24	friendship 27:3,7	40:2,17 41:18	Hague 47:10	94:8	identifying 43:7
50:5,5,8	54:3 95:14	27:12 30:5	42:7 44:13	Half 101:4	holding 65:18	ignore 74:13
famous 30:17	flows 67:4	friendships 97:4	47:12 53:20	Hall 2:1 11:24	holiday 44:22	89:17
33:13	focus 1:16 6:7	97:6,7,8,12	56:9 57:13	handful 36:10	47:24 48:18	ignoring 74:14
fantastic 56:25	58:15	front 1:12 27:8	58:1 64:6,8,17	73:12	home 6:18 35:12	ill-guarded
far 42:12 73:8	focusing 80:17	28:14 51:11,25	65:22 67:12,21	happen 4:6 8:3	35:15,21 36:5	12:19,23
farm 49:24,25	follow 4:4 5:7	103:16 104:1	73:4 78:11	33:22 36:2	50:1,3,12	image 4:14 5:21
favour 109:14	17:13 44:17	104:19 105:8	79:9 84:13	51:18 55:2	54:14 76:7	imaged 4:3,8,11
favourable 71:23	69:1,3	105:11 107:7	91:8 92:20	65:1,13 103:18	82:2,3,4,6,8,8	immediate
88:6,14	followed 69:2	FT 85:7	96:9 100:17	happened 15:5	82:10 94:5	103:15
fear 64:19 65:4	following 20:6	full 1:9 83:7	102:22 103:4	49:13 79:7	101:25 103:8	immediately
65:18,18 66:16	33:15 77:22	funny 37:16	105:20 107:3	102:8 106:25	103:13,14,21	70:22
66:20,22 71:1	font 10:12	further 50:11	110:6,23	110:17	104:18,23	immigration
fearful 67:1 70:7	force 15:15,22	88:21 93:12	111:14	happens 67:18	105:7 106:20	10:9
fed 32:8,10	16:4,14 56:5,6	94:10 101:8	good 22:20 32:11	67:20	107:23 109:9	impact 71:15
fee 90:10	forces 15:24 44:1	future 22:2	32:12 39:19	happy 59:22	110:15	impacting 60:21
feedback 43:23	106:15		44:4 46:24	75:20 88:1	homogeneous	Impartialities
44:3 54:6	Foreign 6:19	<b>G</b>	47:8 75:6	harbour 71:1	14:15	31:6
feel 36:4 43:21	forgot 97:13,14	gained 40:12	107:23 109:3	hard 38:21	hope 45:11 73:14	impartiality 31:4
46:22 65:7	form 11:5 14:24	Gallagher 16:22	Goodman 79:22	hard-fought	73:16 87:21	impetus 26:2
69:25 98:2	92:12	game 40:19	80:3	42:12	96:1 98:16	implicitly 94:14
feelers 88:11	formal 23:25	gap 97:21	Gordon 27:16	harm 70:9 72:24	94:16 95:24	implied 72:20
fees 10:10	49:11 50:18	gather 28:4	28:23 29:9,11	HarperCollins	105:24	105:24
feet 68:10	83:25 84:14	general 8:20	29:14 30:11	100:4 101:17	impolite 102:20	important 12:5
fell 16:23	99:22	22:21 38:18	39:6 40:3,13	harsh 63:18 64:8	14:23 16:21	24:14 29:16
felt 26:7 30:19	formally 2:10	49:6 51:1	41:15 42:3,5	head 2:15 7:8	54:4 58:7,10	58:16,18 59:18
40:3 57:7,18	84:22	53:14 61:22	50:17 52:18	headline 10:11	95:3 97:7	111:6
61:19 65:16	format 34:13	65:23 78:20	63:15 72:7,8	51:11 61:14	impressed 110:2	inasmuch 56:15
67:25 68:4	formation 54:10	79:1,6,10,24	75:8 93:25	64:3,7,12	inbox 45:1 67:18	incident 15:4
75:6 92:1,13	85:3	80:10,15 81:9	Gordon's 31:19	107:7	included 26:11	33:6 47:25
92:17 93:22	formed 85:10	81:10 83:11,16	govern 29:19	hear 15:9 46:14	including 3:3	52:3 58:5
female 92:15	former 3:9	89:15 90:5	government 16:6	heard 17:7 18:4	incomplete	41:11,13,14,19
feral 92:24 93:6	formulation	91:8 94:10	25:18 32:3	24:8 40:9	increase 79:25	80:2
93:11	42:24	100:13	42:3,22 52:18	46:16 47:5	increased 23:24	24:17
feud 30:13,15,16	forward 22:7	generally 24:16	53:3,8 62:21	57:9,20 62:17	increasingly	29:10
31:20	32:24 43:10	31:25 81:14	71:10 86:22	66:4 68:21	incredible 44:2	101:21
fiction 20:11	102:24	91:6	105:24 106:20	71:5 86:10,25	incredibly 58:10	70:3,19 75:1
fight 39:14	found 37:22 44:6	generated 78:6	108:2	hearing 56:23	106:12	Independent
figure 14:6	46:24 65:25	George 46:17	governments	heartfelt 108:23	Iain 47:10	85:9
figures 10:22,24	four 33:12 60:4	47:3 51:9	71:18	heated 110:9,19	ice 30:19	indicate 111:8
file 1:11	74:19 75:2	82:11	Grange 108:13	held 82:18	idea 19:4 21:18	indicated 23:6
files 107:9	fourth 39:14	Gerry 102:12	grateful 2:22	help 39:23 43:25	21:21,22 36:17	indication 58:6
fill 67:18	Fox 46:3	getting 7:5 30:21	great 8:5 9:25	67:20 75:14	44:5 48:3,5,9	80:2
Final 56:4	frankly 75:20	44:2	32:6 45:2 75:5	80:9 91:6	73:19 74:1	indicative 33:7
finally 47:3	free 8:5	gist 7:16 102:21	91:24	Heroes 43:25	101:24 106:17	indirect 6:11,13
109:7	frequency 23:24	give 3:17 4:19	Greece 47:20,24	Heythrop 76:18	106:18 107:23	6:18 7:17
financially 22:4	73:19 74:1	13:8 19:4 36:4	48:4,18,23	76:22	ideas 21:23	indirectly 6:5,6
find 24:16 26:21	77:19 74:1	52:16 58:15,19	grey 23:2	high 22:4 66:10		
43:2,10 88:2	frequent 24:5,6	67:9 73:19	Grieve 109:8	66:14		
88:12 101:6	35:14	74:1 105:12	110:14 111:4,9	higher 61:18		
105:3	frequently 19:3	106:5 111:3	111:15	94:23		
fine 70:6	19:8	given 29:23	Grieve's 111:12	highly 66:20		
first 1:13 27:16	Freud 19:22	51:17 100:7	grieving 68:2	98:23		
28:24 29:13	35:12,16 36:6	gives 74:14	ground 44:3	high-profile		
32:1,4 33:20	81:21 83:3,5	giving 24:4 36:23	group 45:15	92:15		
46:14 47:5,21	Freuds 81:20	go 16:24 17:12	56:12,13 59:6	Hillsborough		
51:14,19 52:8	82:2,8	23:20 24:7	groups 34:9	68:8		
74:12 75:6	Freud's 82:13	44:22,24 57:2	Guardian 78:5	Hinton 11:16		
86:7 92:14	Friday 1:1	57:5 62:12	78:14 85:7	91:17		
five 14:4 39:13	friend 46:25 50:7	68:16 70:17	Guardian's	Hinton's 11:20		
45:19 60:9,11	50:9 81:21	81:16 90:25	77:22	hiring 81:1		
74:12,19	112:3,3	95:18 101:14	guys 37:25	history 47:11		
fixed 52:21	friendly 24:20	106:14		58:15,16 61:1		

7:11,24 69:15 individual 6:8 15:10 16:19 67:14 individuals 59:1 59:21 indulged 64:21 industry 91:19 inexorably 41:22 42:17,23 inference 80:5 influence 54:10 59:17 95:10 96:22 influential 14:22 informal 23:25 50:18 85:2 informally 36:2 84:17,22 88:11 information 28:4 28:5 80:14,14 93:24 infrequent 90:1 initial 52:19 initiatives 48:10 injustice 30:20 injustices 17:2 input 85:24 Inquiry 5:3 14:21 29:7 67:10 68:20 69:5,22 70:5 99:8 insight 29:18 insightful 25:21 insinuations 71:5 instance 81:3,4 instigation 63:21 instinct 44:18 instrumental 18:20 55:25 56:1,6 60:3 intelligence 40:12 intends 39:13 intense 27:21 69:13 interaction 44:21 interest 8:3 21:24 22:6 71:14 84:8,10 97:25 interested 9:1 10:21,25 18:14 22:1,1 53:20 79:15 80:18 84:11 92:7,8 interesting 53:23 interests 16:7 17:3 31:3 70:9 70:18 71:15 72:25 94:20,22 108:25 111:23 intermediary	7:20 internal 22:17 54:4 International 1:22 2:7 3:24 4:2 5:20 8:11 21:15 34:19 48:11 55:18 59:6 61:24 70:7 71:22,24 72:25 78:13,15 80:7 83:21 84:6,8,13 85:5 86:3 100:3,11 100:15 interpretation 23:16 interpreted 23:15 intervened 104:15 105:5 intervention 101:9,13 102:3 introduce 71:18 intrude 72:24 intrusion 60:19 intrusive 65:25 intrusively 45:12 65:19,22 investigation 2:17 investigations 78:18 involved 85:12 91:22 101:14 105:23 involvement 46:12 104:9 iPad 22:5 Iraq 93:3,9 issue 10:15 11:12 23:14 43:23 53:22 69:24 89:9 94:12 101:8 107:19 108:17 111:17 issues 8:20 9:2 10:11,14,16,18 17:16,18 24:3 28:17 29:12 34:11 42:1 44:5,8 50:25 51:7 52:4 53:5 65:14 89:20,22 90:12 94:9 102:22 111:22 ITV 10:22  J Jack 91:17 James 21:19,22 50:12 51:8,17 51:22 54:14 55:2,11,11,16 60:2 86:20 87:15	January 2:5 54:13 73:20 74:23 Jay 1:3,4,8,9 3:2 17:18 20:14 21:14 23:20 29:1 32:21 45:11,21 46:1 75:17,20,25 76:6 78:2,10 82:23 86:7 99:20 106:9 job 2:10 8:9 11:22 21:24 22:20 26:16,17 29:24 46:18,24 46:24 47:3 84:20 97:19,19 John 25:18 31:21 40:20 101:18 join 106:15 joined 1:21 journalism 22:3 22:4 journalist 26:24 27:10,11,25 28:3 32:6 53:25 96:14 97:12,13 journalists 8:9 16:1 22:2 26:11 47:8,11 60:15 91:21 96:17 98:3 112:6 journalist's 26:16 judge 12:16 29:24 judgment 44:15 July 2:12,14 4:20 4:25,25,25 6:3 23:5 77:23,25 77:25 78:14 June 2:9 4:24 5:22 51:21 52:6,9,15,20 justice 1:3,6 2:19 2:22 12:21 16:2,9,12 17:7 21:11 23:19 32:19 43:1 44:6 45:19,22 75:16,19,22 76:5 78:2,4 82:22 84:14,24 85:15 99:15,17 105:22 106:5,8 111:16,20,25 112:11  K Kate 101:21 102:23 Kathryn 50:12 54:14	Kavanagh 32:5 39:17 44:12 52:11 56:2 60:3,13 keen 96:24 keep 7:8 22:4 38:7,7 58:12 97:24 Kelvin's 61:5 Ken 46:7 kept 3:9 20:5 43:21 78:25 key 24:14 57:17 kicking 104:3 kind 84:2 90:10 kindly 52:9 Kinnock 65:7 knew 9:6 45:15 48:13 54:25 56:25 57:13 58:21 59:2,20 86:22 88:8,17 88:18 105:18 knock-on 84:5 know 3:16 8:3,16 10:9,12 12:7 12:11,12 13:15 13:18,19 14:6 15:2,4 16:20 16:23 17:13 18:23,25 19:23 20:12 21:5 22:4 23:1,18 26:13 28:12 31:1,21 32:17 33:10,24,24 36:14 38:23 41:10,13 44:19 46:24 48:11 49:23 50:16,21 51:8,14,19 52:1,8 54:2,24 61:5,10,11 62:8 65:6 66:24 68:1,4 75:13 78:22,24 79:9 82:19 83:3,5,6,10 86:18,20,24 88:21 91:17,25 92:14,23 93:21 96:13 97:10 103:9 105:20 106:22 knows 7:7  L Labour 6:15,15 6:24,25 26:6 26:10 27:14,20 32:2 33:22 36:19,25 37:2 38:13 39:13 41:16 42:24 53:3,8 54:1 56:10 58:20,23	59:1,21 69:18 72:16,21,23 lady 30:5 landline 25:2 large 1:11 14:9 51:6 86:6 95:12 96:25 lasted 49:18 57:17 late 34:5 79:25 81:14 91:23 latest 52:23 79:15 laugh 76:2 launch 106:1 launched 103:19 106:19 Law 107:25 lead 17:10,14 39:13 53:17 68:19 leader 36:20 73:14 leaders 47:17 75:7 leadership 46:3 46:7,9 67:1 leading 15:13 20:19 38:17 68:25 105:16 111:18 leashes 93:15 leave 62:1 led 35:14 99:22 left 4:2,7 5:19 28:15 35:25 37:13,24 62:3 101:18 104:13 legal 4:11 109:25 legendary 44:25 length 64:13 75:5 Les 11:16 91:17 letter 63:14 65:16 103:16 103:20,22 104:1,4 105:17 106:17,18 108:23 letters 45:1 let's 19:13 31:1 74:12,17 87:21 94:10 95:20 98:25 102:7 level 28:18 30:2 55:19 83:8 108:7 Leveson 1:3,6 2:22 12:22 16:2,9,12 17:7 21:11 23:19 32:19 43:1 44:6 45:19,22 75:16,19,22 76:5 78:2,4 82:22 84:14,24	85:15 99:15,17 105:22 106:5,8 111:16,20,25 112:11 Lewis 100:13 Liam 46:3 Liberal 82:25 83:1 licence 90:10 life 10:23 25:6 98:16 112:4 light 85:25 lights 61:6 liked 10:17,20 11:1 57:11 limb 17:13 limited 4:24 18:16 41:5 80:3 line 12:2 27:2 28:1 46:9 66:3 99:10 lines 7:8,13,15 7:20 43:20 87:20 88:4 list 47:16,16,21 47:25 49:23 50:11,15,16 54:12 83:2,7 87:1 102:22 literal 12:14,24 literally 15:7 34:18 98:21 little 52:16 99:23 100:2 live 66:20,22 lives 65:20 lobby 85:11 lobbying 86:1 logic 53:21 logically 6:8 25:1 96:22 LOL 76:1 London 19:15 long 24:12 41:3 43:13 47:11 48:25 49:19 57:17 63:5 65:10 107:24 108:2 longer 4:18 14:4 64:10 81:23 look 1:11 3:4 10:21 12:16 13:16,18,20 25:13 28:13 32:15 34:22 36:12 39:1 54:12 87:1 96:3 99:10 looked 23:12 45:2 looking 22:2,7 31:15 37:25 50:11 Lord 1:3,6 2:22	12:21 16:2,9 16:12 17:7 21:11 23:19 32:19 43:1 44:6 45:19,22 62:2,8 63:7 75:16,19,22 76:5 78:2,4 82:22 84:14,24 85:15 99:15,17 105:22 106:5,8 111:16,20,25 112:11 Lords 8:16 lost 37:17 45:6 52:18 98:14,15 lot 10:13 12:8 32:7 34:12 43:22 54:7 68:14 73:18 92:13 94:21 96:16 106:24 lots 13:1 23:11 43:18 51:2 53:5 76:1 83:9 97:8 loud 76:3 love 76:2 loyal 7:21 LSE 22:17 lunch 34:2 50:11 51:2 109:7 luncheon 112:13 lunches 34:7  M MacLennan 91:18 Maddie 107:9 Madeleine 100:16 104:10 107:17 108:11 Madeleine's 101:25 magazine 1:22 Mail 14:8 38:20 42:8 43:20 85:8 92:1 109:24 main 10:13 52:15 53:6 57:13 59:15 61:17 65:12,13 75:15,24 76:4 98:3 maintained 31:4 major 8:20 25:18 42:1 44:8 55:24 105:16 majority 68:14 74:6 making 16:3 109:25 management 22:15,17 manager 100:13
--	---	--	--	--	---	--

<b>Manchester</b> 15:3	23:18 76:2	<b>mince</b> 88:25	<b>Motorman</b> 91:7	<b>necessarily</b> 23:4	89:4	70:6 72:3
<b>mandate</b> 71:11	<b>media</b> 14:21 26:7	<b>mind</b> 40:9 60:16	91:13	32:24 87:23	<b>Nods</b> 2:15	100:22
<b>Mandelson</b>	27:7,7,21	70:21,22 73:2	<b>move</b> 76:5,6	<b>nee</b> 81:21	<b>note</b> 37:20	<b>offices</b> 6:23
31:22 62:2	31:22 71:13,15	79:11	110:16,18	<b>need</b> 20:14 32:23	<b>notes</b> 34:19	<b>officials</b> 15:19
63:7	71:19 72:24	<b>minds</b> 57:5	111:4	93:7 96:16	37:13	<b>Oh</b> 4:20 21:11
<b>Mandelson's</b>	89:23 91:9	<b>mine</b> 40:18	<b>moved</b> 45:8	<b>needed</b> 37:23	<b>noticed</b> 45:9	23:19 57:22
62:8	92:15 93:4	<b>minister</b> 6:21	<b>moving</b> 41:22	<b>negative</b> 67:25	<b>November</b> 19:17	75:23 77:11
<b>manifestation</b>	<b>mediation</b> 31:21	23:25 24:25	42:17,23 52:7	<b>Neil</b> 65:7	99:8	78:3 80:19
66:9,14	<b>meet</b> 45:15 48:3	27:6 31:14	<b>MPs</b> 4:12,17	<b>Neither</b> 29:22	<b>number</b> 6:18,18	82:17
<b>manifesto</b> 38:22	33:25 47:20,23	35:7 36:6 39:7	66:21	<b>neutral</b> 31:11	24:3 32:19	<b>okay</b> 5:17 7:2
42:6 110:6	76:24 77:13,14	40:25 41:2,3	<b>muddying</b> 91:5	<b>never</b> 68:9 82:10	33:16 36:5	13:4 17:24
<b>manner</b> 58:17	77:15	52:4 68:1	<b>Mulcaire</b> 79:22	85:1 86:25	48:9,14 49:9	20:21 22:8
<b>March</b> 41:6,9,15	<b>meeting</b> 20:6	73:15 103:5,17	80:4	90:8 108:10	49:10 103:12	23:5 32:15,22
41:22 42:3,17	33:25 47:20,23	104:17 105:1,5	<b>mulled</b> 88:25	<b>new</b> 8:18 26:6	104:16,23	34:2 39:1,25
73:24	47:23 49:17	105:10 107:8	<b>mum</b> 63:15	27:14,20,20	105:13	40:19 45:17
<b>margins</b> 10:8	50:13 54:13	<b>ministers</b> 32:16	<b>Murdoch</b> 8:15	32:2 49:23,24	<b>numbered</b> 99:14	46:10 63:25
<b>Mary</b> 1:7,10	74:7 76:18	34:8 56:24	9:1,19 11:18	80:24 93:7	<b>numbers</b> 67:22	68:13 69:9
<b>masters</b> 27:14,17	96:14 99:12,21	87:2	11:21 12:11	97:9 107:21	<b>numerous</b> 23:23	73:4,12 76:6
<b>material</b> 35:13	102:17	<b>ministership</b>	13:18 15:18	<b>news</b> 1:22,22,25	<b>nutshell</b> 52:11	81:19 91:7
40:11	<b>meetings</b> 3:16	29:8	18:5,20 19:13	2:3,7 3:24 4:2		94:10 99:2
<b>matter</b> 37:3	23:24 24:1	<b>minute</b> 28:8	19:25 20:3	5:20 8:11,24	<b>O</b>	101:7
40:16 43:18	32:15 33:5,5	37:24	21:12,20 22:22	9:3,11,21	<b>object</b> 65:22	<b>old</b> 3:14 97:8
44:14 55:14	38:24 47:16,17	<b>minutes</b> 45:20	23:1,5 24:9	11:14,17 14:3	<b>objective</b> 107:16	<b>once</b> 35:17 45:16
89:16 103:1	50:18,20 54:12	57:18 87:9	30:9 35:13,16	18:3,13,16	<b>observer</b> 28:12	73:22 78:23
109:6 112:5	87:2 100:12	<b>minutiae</b> 13:3	36:6 45:13,14	21:15 24:9	<b>obvious</b> 2:23	82:11 85:9
<b>matters</b> 43:3	<b>megaphone</b>	<b>mirror</b> 25:15	47:24 48:6,7	34:19 36:14	61:4 70:14	<b>ones</b> 6:13
89:18	16:15 96:20	47:9 53:25,25	48:19 49:5	39:6 45:8	96:12	<b>one-off</b> 64:23
<b>Matthew</b> 19:22	112:8	54:9	50:12 51:8,17	46:19,23 48:11	<b>obviously</b> 4:21	<b>one-to-one</b> 35:8
35:12,21 36:5	<b>members</b> 19:25	<b>mirroring</b> 53:19	51:21,22 54:14	55:18 59:6	6:21 11:5 24:8	<b>online</b> 35:13 39:9
82:13	47:17	<b>mistake</b> 64:7	55:2,11,16	61:24 70:7	24:11 33:20	<b>onside</b> 88:12
<b>maximum</b> 36:11	<b>memories</b> 34:22	<b>mistaken</b> 111:15	56:4 60:1,2	71:22,24 72:25	58:24 65:12,22	<b>opening</b> 96:19
56:20	<b>memory</b> 34:21	<b>mistakes</b> 1:21	68:22,24 69:6	78:13,15,23	69:13 74:25	107:9
<b>McCann</b> 101:7	35:10 40:2	63:17	69:7,10,19,21	80:7,12,13,22	83:20 84:5,10	<b>operation</b> 2:18
101:20,21	74:15 89:2	<b>mix</b> 44:13	71:5 81:21	83:20,21,22	85:25 86:21	2:18 91:7,13
102:4,12,23,23	103:20	<b>Mm</b> 25:8 37:6	82:13 84:25	84:6,8,11,13	87:19 90:23	108:12,13
108:11	<b>memory's</b> 51:4	61:11 95:2	86:20 91:17	84:23,24 85:5	<b>occasion</b> 3:21	<b>opinion</b> 17:10,14
<b>McCanns</b> 99:3	<b>mentioned</b> 17:25	<b>Mm-hm</b> 51:13	94:13,19,22	85:6,11 86:3,3	21:1 34:24	29:20 54:9,11
102:9 103:17	22:22 87:15,16	55:5 72:4	95:4,10,18,24	87:18 93:8	35:22,25 36:4	61:4 97:22
104:11,24	87:18 93:8	<b>mobile</b> 5:15	<b>Murdochs</b> 48:3	100:3,11,15	41:18 48:4,22	104:13
106:2,11 107:6	<b>merely</b> 44:10	24:23 62:2	52:10 83:23	<b>newspaper</b> 14:2	49:16 65:24	<b>opinions</b> 60:21
107:10,20	111:22	<b>models</b> 22:3	<b>Murdoch's</b> 10:4	14:24 15:14,21	73:17 74:8	<b>opportunity</b> 86:1
108:20,24	<b>message</b> 5:11 7:8	<b>module</b> 96:19	11:15 12:3,5	16:13 26:25	78:22 87:3,7	<b>opposed</b> 111:22
<b>McCann's</b> 99:5	7:18,19,25	<b>modules</b> 22:17	18:15 20:23	28:2 31:15	88:21 92:3,16	<b>opposite</b> 110:24
99:25 107:17	62:4	<b>Mohan</b> 22:8,23	21:17,21,22	34:9 36:13,21	94:2	111:10
<b>mean</b> 10:12 11:5	<b>messages</b> 6:2,10	55:15 56:3	48:14,21 55:11	43:19 61:1	<b>occasionally</b>	<b>opposition</b> 36:20
12:7 13:25	6:11,18 8:4	60:6,15 64:14	56:1 69:2,3	66:3 67:22	18:15 65:12	73:15 86:6
17:20 18:15	62:1 73:5 74:5	101:19 102:6	87:15	95:12,13 96:15	74:8 76:1,14	<b>order</b> 6:7 57:19
23:13 25:14,20	<b>Messrs</b> 80:3	103:9 104:8	<b>mystery</b> 5:24	97:11	88:10 93:8,21	95:3 106:2,19
26:15,23 28:3	<b>met</b> 23:23 24:10	106:15 107:2	<b>myth</b> 15:14,20	<b>newspapers</b>	<b>occasions</b> 23:23	<b>ordered</b> 104:17
34:3,3,25	46:17 48:22	<b>Mohan's</b> 101:24	16:9	14:23 16:18	35:15 36:5	106:23
44:21 45:4	74:11,25 76:14	<b>moment</b> 24:14	<b>métier</b> 65:20	17:6 18:17	68:15 90:7	<b>ordinary</b> 3:11
47:8 51:1	88:22 89:25	83:20		25:17 44:20	<b>occur</b> 47:12 71:8	<b>organisation</b>
52:19 55:25	104:20 105:9	<b>money</b> 90:6		65:23 66:10,14	72:17 97:6	74:6
57:1 58:25	<b>Metropolitan</b>	108:7,9		66:20 67:10	<b>occurred</b> 4:10	<b>organisations</b>
59:1 65:2 72:7	104:18 105:6	<b>monolithic</b> 14:15	<b>name</b> 1:9 63:17	68:14 101:15	<b>October</b> 1:14	73:1
73:13,14,16	<b>Michael</b> 36:20	<b>month</b> 4:14,19	68:2 86:7,18	109:2	11:24 63:2	<b>organised</b> 48:9
74:25 83:5	<b>middle</b> 55:21	18:12	86:22	<b>newsroom</b> 34:10	77:17 87:4	<b>original</b> 102:3
84:17 85:22	<b>Miliband</b> 7:22	<b>months</b> 74:12,19	<b>named</b> 59:7	45:3 66:6	<b>odds</b> 70:9	<b>Osborne</b> 5:19
88:9 89:12,24	<b>military</b> 44:4	84:4 86:16	<b>narrative</b> 3:20	<b>newsworthy</b>	<b>offence</b> 45:4	46:17 47:4
90:4 93:22	52:5 54:19	<b>morning</b> 20:6	26:2	81:18	<b>offensive</b> 62:18	82:11 86:24
96:17 97:8	<b>million</b> 14:7,9	64:11	<b>nation</b> 13:15,25	<b>Newton</b> 32:7	<b>office</b> 6:19,19	111:10
98:11 101:5	101:3,4,4,6	<b>motivated</b> 66:20	14:15	56:2 60:14	16:24 35:25	<b>other's</b> 76:9
<b>means</b> 87:17	108:9	98:23	<b>national</b> 13:14	103:10	48:14 54:17	<b>outcome</b> 39:15
107:16	<b>millions</b> 25:20	<b>motivates</b> 96:11	<b>nation's</b> 13:20	<b>NI</b> 5:8	103:13,14	<b>outlets</b> 85:11
<b>meant</b> 13:3 15:1	43:6	<b>motive</b> 61:21	<b>nature</b> 65:2 86:4	<b>night</b> 57:15	104:23	<b>outside</b> 21:10
15:6,7 23:14	<b>Milly</b> 77:23	<b>motives</b> 96:6	<b>nearby</b> 50:3	61:24 63:2,6	<b>officer</b> 21:15	<b>overall</b> 17:11

68:4 92:23 overruled 75:20 overstating 76:12 oversteps 66:3 overtook 14:3 overwhelming 41:25 54:6 68:6 91:4 Owing 33:2 Oxfordshire 76:10 81:24 82:20 o'clock 112:11	34:23 35:5 38:16 39:1 43:23 44:20 46:6,9 67:14 67:23 68:23 75:5 77:4 78:19 81:15 91:20 97:4 particularly 8:8 particularly 3:4 9:8 11:5 15:12 16:17 20:2 25:13,21 28:16 31:2 32:9 33:14 34:7,21 36:24 42:2,9 43:15 49:19 54:18 56:8 63:18 68:21 69:5 79:14,20 81:11 84:7 86:5 88:10 89:25 90:4 91:9,16 97:20 102:18 105:14 parties 47:18 82:24 parts 11:6 party 8:20 11:8 12:11 19:21,24 20:23 21:5 26:10 28:10,16 33:22 36:19,23 36:25 37:2 38:14 41:16,23 41:25 42:18,24 47:6 49:24 50:2 51:10,16 55:6,23 56:10 56:22 57:7,14 58:2,23 59:1 59:21 60:2 61:24 72:16,21 72:23 75:7 77:17 82:15 87:8,9,20 89:1 89:5 Party's 109:20 pass 73:1 passed 40:11,13 93:24 pattern 19:6 pausing 15:16 100:17 paywalls 22:6 PA's 3:14 41:20 PCC 90:20 people 6:23 34:16,23 51:2 54:16,17 58:22 59:6 60:4,21 60:22 66:21 67:22 68:10 73:18 75:18 88:20 93:22 94:2 95:18	97:25 98:3,7,8 98:13,16,22 perceive 95:9 percentage 14:10 95:14 performance 75:3 period 4:24 24:13 34:22 35:10 50:21 54:25 74:2,12 74:15 permeates 18:2 person 61:6 72:13 98:1 personal 64:17 64:20 65:4,11 65:16,17,18,20 66:17 67:17 72:9,15 74:9 85:21 88:2 92:17 97:16 98:7 personality 28:18 66:11,15 personally 8:13 59:5 104:16 person's 31:10 perspective 17:23 22:21 25:4 53:18 61:1 90:4 Persuade 106:7 Persuasion 106:8 perverting 2:19 Peter 31:21 petitions 43:19 phenomenon 80:3 phone 5:15 24:23 24:23 43:20 76:7 78:12,24 81:17 phoned 18:10 phones 62:2 phrase 60:24 phrased 93:24 picture 3:15 6:7 6:8 24:4 49:10 92:8,23 pie 88:25 piece 36:13 39:3 39:15 46:19 67:16,18 68:23 96:8 pitches 100:5 place 3:16 22:23 22:24 49:4 51:15,19 108:19 plan 57:5 109:22 planted 39:22 Platell 47:10 play 40:19 55:24 84:21 94:11	played 31:11 83:25 playground 31:13,17 pleasant 32:9 please 1:5,9,11 3:4 4:19 8:15 21:11,13 58:12 58:15 pleased 46:25 49:16 plenty 94:1 pm 112:12 point 10:12 11:8 12:9 14:13,14 14:18,19 16:2 16:25 24:17 26:6 28:15 40:6 41:14 49:20 50:4,12 52:2 53:6 54:8 54:11 58:9 63:8 65:23 67:9 70:14,16 93:12 95:3 101:17 102:3 109:9 110:1 pointed 96:18 pointless 72:11 points 13:3 point-to-point 76:19,22 77:12 point-to-points 77:3 police 2:17 20:8 78:18 102:12 104:18 105:7 policies 36:24 53:2 71:13 policy 8:21 12:10 16:6 26:13 30:20 38:14,16 56:25 65:14 66:1 71:19 72:24 89:23 97:22 110:5 112:8 policy-making 72:10 politely 102:16 political 9:2,15 12:6,11 22:21 23:23 25:15 28:10 29:5 32:6 34:7 47:17 50:25 55:15 56:20 60:14 politically 10:3 politician 12:10 27:6 28:1,1 52:3 66:16 72:9 89:25 90:9,19 91:14 96:2,13 97:14 105:18	politicians 5:8,11 6:3,11,13,15 6:15,24,25 8:6 21:1 23:20 24:8,16 25:25 26:3,12,17,24 64:19 65:5,19 65:24 66:19 82:4,7,24 84:19 85:12 89:17,19 90:14 90:22 91:22 93:19 94:18,21 94:23 95:9,15 95:20 96:7,12 96:16,24 97:5 97:16 98:19,21 108:23 112:6,8 politics 47:12 61:8 polls 43:18 52:25 53:16,17,17 54:4 pondered 96:9 pop 76:9 popped 89:1 popping 76:11 population 14:10 42:12 position 10:3 17:11,14 41:24 52:21 109:14 109:15,18,19 positive 101:23 possession 96:20 possibility 60:23 possible 25:19 95:17 possibly 21:7 49:9 81:1 102:25 post 44:24 51:23 51:24 93:3 posted 88:13 103:16 potential 98:6 pounds 101:2 power 16:18,19 16:20,23 24:12 27:22 59:5 60:12,20 66:9 66:14,23,23 67:14 70:9 71:11 72:22 94:11 97:16,23 98:13 107:13 powerful 16:14 17:1 practice 95:4 pre 38:24 precise 3:18 80:6 prejudice 72:9 88:2 prejudices 72:15 premise 66:7 72:8,11	prepared 39:2 preposterous 73:14 Prescott 31:21 40:20 presence 25:6 26:20,23 27:4 present 17:16,18 21:1,3,9,13 34:4 54:15,17 82:12 presentation 85:16 presented 84:12 107:19 108:19 press 8:5 25:5,19 26:3,11 37:25 65:23 89:22 90:12,13,21 91:16 92:8,11 92:21,24 93:6 93:13 112:7 pressure 105:23 108:3 pressures 112:7 presumably 9:7 9:16 10:1 21:3 48:18,22 pretty 9:6 21:5 36:19 43:17 44:4 50:19 51:4 54:1 56:7 61:4 82:10 83:7 87:8 88:16 90:5 91:10 96:12 98:23 102:5 104:7 107:24 previous 69:14 price 91:7,13 100:24 prime 6:21 23:25 24:25 27:6 29:8 31:14 32:16 34:8 35:7 36:6 39:7 40:25 41:2,3 52:4 68:1 73:15 87:2 103:5,17 104:17 105:1,5 105:10 107:8 Princess 68:12 principal 1:16 principles 10:8 printed 14:24 39:9,11,18 prior 36:15 37:8 38:6,8 priority 23:6,12 61:18 Priory 82:18 privacy 66:5 91:8,13 private 5:3,4 64:1 68:18	70:1 77:17 87:9 89:18 91:10 92:7 privately 93:19 privileged 80:14 pro 72:22 109:25 probably 7:4,5 9:1,10 24:7,10 30:5 34:19,25 35:24 43:16 45:16 46:7,20 51:2,20 53:7 53:23 54:25 55:13 56:11 58:3 68:1,6 69:25 73:20 75:1,17 79:12 79:24 83:10 85:9,12 86:2 90:15 91:22 92:5 94:23 100:1 103:14 problems 4:15 process 36:23 73:1 87:25 88:15 100:3 processes 96:6 professional 27:9 85:20 programmes 10:23,23 22:15 22:18 projection 64:3 promise 42:7 43:21 109:20 109:20 promised 42:6 109:23 promises 110:22 promote 85:11 proper 31:23 71:8,17 89:6,8 properly 27:9 proprietor 8:19 proprietors 15:15 16:14 prospect 100:7 Protection 91:19 prove 28:5 proved 111:12 provided 1:13 pro-armed 44:1 pro-BBC 90:5 pry 11:3 prying 65:19,22 pub 15:2,5,9 public 8:4 20:15 71:14 83:14,15 83:18 84:3 85:16 90:6 97:22,22 112:5 publication 77:22 publicly 8:10 79:15 80:8 publish 104:1
--	---	---	--	---	---	--

<b>publishers</b> 100:9	<b>quo</b> 72:23	92:21 93:9	20:20 30:13	<b>research</b> 54:5	11:10 100:3	<b>scared</b> 98:22
<b>punchy</b> 61:3		98:13	48:15 50:15	<b>resign</b> 46:23	109:12,22	<b>schedule</b> 3:17,19
<b>purely</b> 65:17	<b>R</b>	<b>reason</b> 57:8,12	61:12 74:1	<b>resigned</b> 2:12	111:15	32:15 40:24
<b>pursue</b> 44:14	<b>radar</b> 70:14	57:13,15 69:12	99:5	87:19	<b>ringing</b> 45:5	<b>scoops</b> 32:2,5,7
<b>pursuing</b> 43:3	<b>raised</b> 87:7	77:13 84:16	<b>relationship</b>	<b>resolve</b> 70:5	<b>rising</b> 53:4	<b>scope</b> 89:7
<b>put</b> 2:23 5:17	<b>rally</b> 33:25	94:19 101:14	13:13 19:12	<b>respect</b> 80:20	<b>RMB1</b> 32:16	<b>search</b> 100:16
23:17 25:16	<b>ran</b> 43:20	108:20	30:2,10 96:5	<b>respected</b> 45:4	40:24 47:16	104:10
27:7,13 31:12	<b>rang</b> 63:22	<b>reasons</b> 85:20,21	112:6	<b>respond</b> 103:25	87:1	<b>season</b> 55:7,23
32:3,21 33:7	<b>range</b> 82:23	<b>Rebekah</b> 1:4,7	<b>relationships</b>	<b>responded</b> 80:25	<b>role</b> 27:11 28:3	57:15
38:21 47:21	84:19	1:10 44:12	23:20 85:19	<b>responding</b>	55:24 67:6	<b>second</b> 1:16 3:5
51:20 62:6	<b>rarely</b> 89:24	99:12,21	<b>relay</b> 69:10	111:23	81:20 83:25	13:8 81:2
64:3 72:9,13	<b>Rawnsley's</b> 40:4	100:14	<b>relayed</b> 69:6	<b>response</b> 12:21	84:15 85:2	<b>secondly</b> 1:14
76:13 77:7,21	<b>reach</b> 61:4	<b>recall</b> 12:22	<b>release</b> 50:17	63:14	87:19 90:2	<b>secret</b> 80:14
85:1 87:24	<b>reacting</b> 17:5	19:17,18,20	<b>relevance</b> 5:2	<b>responsibility</b>	94:7,8 97:2,4	<b>secretaries</b> 6:20
94:21 96:24	25:23,24	33:13 46:14	85:25	59:16 60:1	97:18	25:6 94:5
97:7 98:6	<b>reaction</b> 46:19	47:23 63:21	<b>relevant</b> 16:5	<b>responsible</b>	<b>roof</b> 37:15,24	<b>Secretary</b> 102:1
104:18 105:7	46:21 67:25	86:8 99:23	25:22 68:20	55:21 72:8	38:11	103:9,21,25
105:10 107:5	68:6,8 69:17	100:19 102:10	69:5 70:4 87:3	97:18	<b>room</b> 15:9 44:24	104:6,19 105:7
110:5	<b>reactions</b> 68:7	<b>receive</b> 6:2 7:19	91:14	<b>rest</b> 91:19 101:7	44:25	106:21 107:23
<b>putting</b> 32:24	<b>reactive</b> 17:9	32:2,4	<b>reliability</b> 20:17	<b>restaurant</b> 35:8	<b>roots</b> 67:4	109:9 110:15
44:16 68:25	<b>read</b> 12:13 14:11	<b>received</b> 6:10,17	<b>reluctant</b> 30:25	<b>restaurants</b>	<b>Rubicon</b> 86:8	<b>sector</b> 90:6
86:2 88:11	29:7 73:13	7:7 99:8	<b>remark</b> 12:19	34:14	<b>rude</b> 45:5	<b>securing</b> 101:9
105:23	77:9,11 106:13	<b>recess</b> 40:8	<b>remember</b> 17:4	<b>result</b> 103:15	<b>run</b> 7:22 37:20	<b>see</b> 7:13 10:22
	<b>reader</b> 45:3,5	<b>recession</b> 53:4	20:2 33:18	107:8,14	43:19 101:24	14:18,19 17:4
<b>Q</b>	53:25 67:7	<b>recollection</b> 35:1	35:18 36:18	<b>resulted</b> 64:24	103:22	19:13 30:10,11
<b>quality</b> 22:4	<b>readers</b> 10:20,25	<b>recommendati...</b>	37:10,24 38:8	<b>returned</b> 4:12,16	<b>runes</b> 43:7	34:2,15 35:12
<b>quasi-judicial</b>	12:7,9 13:14	11:20 22:9	39:3 40:1	69:24	<b>running</b> 42:21	38:2 40:24
85:23	16:25 17:6,13	<b>record</b> 37:3	41:17 45:8	<b>reveal</b> 32:14	<b>run-up</b> 70:25	41:9 53:21
<b>question</b> 5:17 9:4	25:23 26:15	47:22 74:13,14	46:8 48:25	39:20	74:17	55:4 58:3
9:13 12:21	27:1 29:17,22	74:24 109:6	50:24 53:15	<b>review</b> 99:22,22	<b>Rupert</b> 20:3,23	59:10 60:17,19
17:4 20:19	30:20 31:4,16	<b>recorded</b> 41:7	54:15 57:16	101:9,25	21:20,21 48:7	60:22,24 61:9
25:22 27:23	38:15 42:2	<b>records</b> 80:16	63:12,13,20,23	102:13 103:5	51:21 55:16	70:10,11 73:8
29:1 31:8	43:3,5,6,17,23	<b>recurring</b> 67:3	65:2 67:24	103:17,22	56:1,4 60:1	74:24 82:23
35:20 37:7	44:9,21,23	<b>red</b> 37:18	69:7,12 75:4	104:17 105:6	94:13	83:2 93:15,16
38:4,4 42:16	45:5 53:5,19	<b>refer</b> 44:18	77:1,5 79:5,20	105:12 106:2	<b>Rusbridger</b>	94:10 95:20
42:20 52:7,7	54:5,9 57:1	<b>reference</b> 3:8	80:15 81:14	106:12,13,21	31:18	97:17 98:21,25
53:10,11 58:12	67:25 90:5	<b>referendum</b>	83:18 90:18	106:22 107:2		98:25 102:7
58:13 59:20	97:23 108:16	38:21 42:5,11	91:21 93:23	107:15,17,20	<b>S</b>	<b>seeing</b> 37:25
66:6,13 70:11	108:18,18	42:13 43:22	99:3 100:25	108:12,19,21	<b>sackable</b> 45:4	<b>seek</b> 15:14
75:18,22 76:24	110:16 111:22	51:24	101:1,5,13	<b>revised</b> 32:21	<b>sake</b> 65:15	<b>seeking</b> 89:17
78:10,10 81:12	111:23	<b>referred</b> 55:1	102:13,15,18	<b>right</b> 1:23,24 2:3	<b>Samantha</b> 89:4	<b>seen</b> 7:11 20:22
90:17 93:23	<b>readership</b> 14:6	<b>referring</b> 5:4	103:23 104:2,3	2:4 5:5,25 6:5	<b>Santorini</b> 47:20	22:13 33:6
99:10,20	14:16 15:11	23:7 69:1 93:5	106:17,19,24	7:16 9:23	47:24	35:24 41:15
<b>questions</b> 1:8	16:19,20 17:12	<b>reflect</b> 12:3 13:2	107:2,9,10	18:13,21 19:10	<b>Sarah</b> 30:4 45:14	59:12 62:8
23:11 70:5	17:16 27:11	17:1,11 112:2	109:11 111:6	22:10 23:3	<b>Sarah's</b> 107:25	76:20 88:9
77:20 83:11	53:1,24 54:6	<b>reflected</b> 12:10	<b>renege</b> 42:7	29:1 35:6 37:4	<b>Saturday</b> 14:3	89:6
89:15 94:10	59:16 60:17	70:21	<b>reneging</b> 51:23	37:14 39:10	18:11	<b>Select</b> 37:21
<b>quick</b> 109:14	66:24,25 67:4	<b>reflecting</b> 90:18	<b>repeal</b> 11:9	44:17 45:22	<b>save</b> 43:5	<b>selfish</b> 94:25
<b>quid</b> 72:22	67:11,13 95:13	108:15	109:21 110:7	48:20 50:21	<b>saved</b> 4:3,9	<b>self-evident</b>
<b>quite</b> 10:7,20,25	96:23 97:1	<b>reflection</b> 15:8	110:23 111:14	55:22 57:19	<b>saw</b> 23:15 41:16	33:23 89:18
26:21 28:15	108:22	15:10	<b>repeat</b> 64:14	58:4 60:16	42:14 59:8,19	<b>self-evidently</b>
30:11,25 31:8	<b>readership's</b>	<b>reflects</b> 13:14	105:4	61:19,23 67:8	64:12 91:10	96:22
34:5 36:7,8	56:8	<b>reform</b> 29:13	<b>repeats</b> 28:1	71:23 75:19,23	97:17	<b>self-indulgence</b>
38:21 42:20	<b>reading</b> 43:7	<b>refresh</b> 74:15	<b>replace</b> 11:9	76:5 77:11	<b>saying</b> 12:23	96:8
45:6 49:20	<b>reads</b> 35:13	<b>regard</b> 97:2	109:21 111:14	78:7,8 79:3	13:19 15:20	<b>self-regulation</b>
51:3 53:8 54:4	<b>ready</b> 57:14	<b>regular</b> 19:5	<b>replacement</b>	80:19 81:22	16:16 23:10	90:12
56:11 58:16	<b>real</b> 10:23 31:15	<b>regularly</b> 30:11	22:8	83:1 99:2,9,13	38:7 43:21	<b>self-same</b> 9:4
61:2 62:18,18	71:8 97:25	94:4,5	<b>report</b> 26:15	99:19 102:1	53:11 57:3,6,6	<b>sell</b> 109:2
63:13,24 64:2	<b>realised</b> 23:16	<b>regulation</b> 71:18	<b>reported</b> 7:6	104:6 106:8,21	67:1,3,13	<b>sells</b> 109:1
64:4,20 71:12	<b>reality</b> 10:23	89:22	27:19	107:14,15,18	71:23 88:14	<b>seminars</b> 11:23
84:15 85:1	<b>really</b> 6:14 12:4	<b>relate</b> 3:3 79:10	<b>reporters</b> 23:11	108:14 109:17	102:13,18	<b>send</b> 7:2
88:3,8,14	15:1,13 16:2,9	<b>related</b> 53:12	<b>represented</b> 83:8	110:3 111:8	107:15 110:10	<b>senior</b> 25:5 34:9
91:23 92:4,5	16:20 42:16	81:1	83:9	112:11	110:22	34:11 52:3
92:14,17 98:11	47:8 55:18	<b>relates</b> 78:19	<b>represents</b> 13:9	<b>rightly</b> 56:19	<b>says</b> 34:18 99:17	56:24 84:18
100:2 109:17	68:18 80:18	<b>relation</b> 7:6	<b>request</b> 62:6	59:14 64:2,4	101:11	96:14
110:9	81:8 90:8	11:24 12:3	103:6	<b>rights</b> 11:4,4,7	<b>scare</b> 66:21	<b>sense</b> 59:4 70:4



98:17 sensed 98:17 sent 7:1 20:8 sentence 28:24 43:1,16 44:6 91:20 109:16 September 2:10 37:5 41:17 50:21 51:8,12 51:18 52:22 62:25 serialisation 99:3 100:9,17 100:24 102:24 109:3 serialise 100:5 100:11,15 series 62:1,3 serious 10:11,15 10:17 31:15 seriously 57:3,6 111:1 settlement 72:21 seven 21:25 sexist 92:14 shades 23:2 shadow 109:9,18 110:11 shaping 16:5 share 40:17 shift 25:18 51:14 51:19 short 18:7 45:24 108:1 shortly 24:10 62:25 83:14,19 shows 65:1 side 26:11 28:7 28:20 29:2,2 29:21,22 30:13 30:18 31:2,10 31:19 sides 108:6 sign 75:23 76:1,3 signed 75:13 significant 77:14 silence 67:20 110:21 similar 7:24 10:3 10:14 18:6 69:16,16,17 71:5 72:25 95:15 109:17 simple 52:8 simply 27:13 54:8 singular 14:18 sinister 98:12 sir 1:4 3:1 16:16 75:23 78:8 99:19 106:3 sister-in-law 89:4 sister-in-laws 89:1 sister-in-law's	50:1 sit 34:10 situation 81:17 situations 95:15 sit-down 49:11 six 4:13 84:4 86:16 size 10:12,12 sketch 13:8 Sky 83:9 slant 17:19 slight 62:11 slightly 47:5 73:21 102:16 small 56:11,13 59:6 Smith 47:11 smoke 37:16,18 37:18,19,20,22 61:5 snap 42:10 51:24 social 9:14 11:2 13:11 18:1 23:23 24:1 45:11,13 50:18 74:8 89:18 socially 74:11,22 sole 57:13 somewhat 100:6 son 63:15 68:3 sorry 4:20 6:17 7:21 12:1 18:9 20:18 29:1 31:6,8 32:17 34:17 35:20,24 37:16 38:7 39:5,5 40:15 41:8,19 42:19 60:18 62:7 65:3 66:13 68:23 69:17 74:15 75:23 76:25 77:9 78:3,8 80:15 82:17 99:19 106:24 108:14 111:5 sort 3:10 14:7 15:8 19:5 29:10 37:14 44:25 45:2 49:11,12 56:9 61:2 64:14 67:3 68:4 69:16,17 71:6 74:15 78:24 81:11 90:8,9 91:8 92:18 93:5 98:22 105:24 sorts 21:8 soundings 88:12 source 40:17,20 sources 20:13,14 20:15 32:11,13 32:14 39:19	105:21 south 76:9 spat 31:13 speak 11:17,21 19:1 28:19 42:10 61:13,16 61:17,19 62:5 62:7,9 63:5,6 63:11 74:7 81:13 84:3 89:3 91:5 103:8 104:23 speaking 7:25 31:25 speaks 93:11 specific 6:16 11:12 50:24 55:4 79:2,23 speech 56:16 57:16,21,23 93:11 spell 68:2 spelling 63:16 spend 12:7 spent 43:15 57:17 91:18 108:8 spin 17:18,22 27:14,17 32:3 splashed 63:14 spoke 43:3 63:19 102:4 spoken 8:18 24:2 63:7 64:11 103:10,12 spontaneously 36:2 spot 82:24 spring 70:22 stage 38:19 45:14 47:5 51:23 54:24 70:25 stand 9:7,16 10:16 22:23 31:17,18 standing 38:2 110:10 start 56:22 105:17 started 51:22 108:12,22 state 6:20 79:11 103:25 104:6 statement 1:14 1:15,16 3:5 12:4,8 13:7,8 13:22 14:20 18:19 23:22 28:20,25 29:4 44:19 46:16 96:19 97:20 statements 1:12 1:18 2:23 station 20:8 stayed 48:25	step 40:5 steps 27:15,23 stood 22:22 43:18 53:2 stop 67:22 stopped 41:6 store 25:16 stories 18:14 19:13 21:8 32:2 44:16 story 26:8,9 27:25 31:20 40:1,10 64:4 65:13 67:23 69:8 77:23,24 78:5,14,24 79:6 80:13 93:7 108:20 straightforward 38:5 strategy 84:1 85:14,15 105:23 106:1 106:10 Straw 91:17 street 23:7 41:18 50:20 103:1,4 103:8,18 strong 8:5 11:3 11:20 22:9 61:3 62:3 80:4 98:23 105:16 106:4 study 98:25 99:1 107:12 subject 36:15 37:8 38:5,23 89:16 90:2,3 90:21,24 subsequent 49:7 subsequently 100:10 subtle 112:7 succeeded 56:16 successful 101:9 101:11 suddenly 17:12 suggest 85:2 98:12 suggested 40:11 40:15 suggesting 94:25 102:20 107:13 suggestion 77:11 suit 16:6 summarising 102:21 summer 40:7 48:7 53:1,7 Sun 2:2,5 8:25 8:25 9:2,9 11:7 12:1,3,13,16 13:1,9,14,16 13:19,20 14:1 14:3,11,12 16:18,25 17:25	18:16,18 19:2 21:25 22:16 24:7,15 25:23 28:11,11 29:16 32:1 34:6 36:14,21 37:2 37:13 38:19 39:3,23 41:4 41:22,24 42:9 42:9,10,17 43:13,20 44:21 44:23,25 45:3 45:9 46:6 51:9 52:1 53:22 54:3 55:13,15 57:1,4 58:10 61:1 63:14,18 64:6,16,19,20 65:4,7,14,21 66:10 69:18 72:1,15,21 90:4 93:20 95:16 96:25 97:1,18 100:18 101:16,23 102:1 103:4,6 103:15,19 104:3,18 105:7 105:11,16 107:4,7,10,22 109:23 110:7 Sunday 1:22 100:18 101:16 102:2 109:4 Sun's 28:14 37:7 38:5 54:22 58:9 104:20 105:8 support 6:2 36:13 37:1,2,7 38:5 41:25 42:22,23 46:7 51:10 52:18 53:8 54:22 58:11,20 72:23 supported 43:8 46:2 56:10 72:15 103:6 107:19 supporting 28:16 32:1 41:23 42:18 suppose 10:2 67:9 71:9 85:12 91:16 sure 18:13 21:6 24:14 25:10,12 31:1 33:14,19 35:18,23 36:19 36:24 37:22 38:24 41:10 43:17 45:7 48:5 50:16,16 50:19 51:3,4 52:25 54:19 65:8 69:4	70:20 71:17 76:20 77:25 81:6 82:10 83:5,7,8 86:4 86:12 87:8 88:16 89:8 92:20 94:23 98:11 101:6 102:5 103:13 104:7 107:24 109:4 111:25 surprise 21:5 69:20 surprised 47:1,2 47:6,14 62:19 93:9 suspected 64:5 swim 19:14 swimming 21:12 sworn 1:7 swung 100:14  T tab 1:13,15 32:17,21 39:2 82:15,16 99:6 table 15:9 110:4 110:9,21 tackle 17:2 take 9:19 27:15 27:23 30:17 31:10 44:23 51:14,19 63:5 68:1 74:12,17 98:25 101:8 103:1 108:2 111:16 taken 11:22 15:7 59:23 68:5 108:19 110:25 takes 27:25 talk 16:4 63:10 99:12,21 talked 15:5 105:18,19 talking 3:10 6:20 13:16,20 16:10 28:22,24 49:13 49:15 57:25 67:17 98:12,18 taxation 57:1 taxpayer's 90:6 team 4:11 44:24 55:16,18 95:17 96:25 105:2 106:16 team's 12:6 Telecom 85:8 Telegraph 16:22 38:20 42:8 85:8 109:24 telephone 24:3 25:1 41:6 television 75:4 tell 1:21 4:9 24:19 26:8,9	26:12,13,17 31:5 38:10 39:21,23,24 54:23 69:21 70:2 79:4,12 110:13,18 telling 29:24 36:10 40:17 107:2 tells 61:3 89:4 temporal 93:12 ten 24:12 81:22 97:11 107:25 tense 63:24 68:17 term 60:3 terms 9:2 11:2 14:5 22:21 49:6 51:1 53:2 53:14 55:23 56:7,11 59:8 59:11,12 60:18 61:9 67:22 69:1 78:20 79:1,6 85:1 91:9 93:8 97:23 107:5 109:5 terribly 56:22 test 67:16 testimony 30:9 87:15 text 5:11 7:18 24:22 62:1 73:5,17 74:4 75:7,8 77:1 texted 73:9 76:19 texts 3:3 4:1,8,13 4:14,23 5:18 75:13 Thank 1:6 3:1 32:20 99:19 thankfully 73:11 theme 67:3 Theresa 102:5 104:19 105:8 105:11 they'd 57:10 107:21 110:5 thing 34:1 38:8 58:4 59:18 60:16 61:19,23 64:14 84:2 102:1 106:21 107:19 things 10:7 13:1 26:12,13,14 45:9 52:18 53:23 71:4 72:13 73:15 92:18,19 think 2:5 4:7,12 4:18 5:1 7:14 8:18 9:1,5,20 11:9,10,11,20
--	--	--	--	---	--	--

12:4,12,13,20 12:23,24 13:3 14:1,4,9 15:12 15:17 16:16,16 16:20,22,24,25 17:4,8,16,25 19:21 21:22,25 22:5,9 23:9,11 24:6,10,24 25:9,10,12,13 25:17 26:4,6 26:24 27:6,10 27:12,16,18,20 27:25 28:10,12 28:13,22 29:13 30:15,17,23 31:23 32:4,5,8 32:23 33:17 34:12 35:10 36:7,19 37:11 37:13,14,23 38:9,20 39:17 39:19,21,24 40:1,4,5,7,8,20 41:24 42:3,4,8 42:20 43:12,20 43:24 44:15 45:16 46:5,5 46:15 47:10,14 48:5,8,13 49:1 49:1 51:11,20 51:23,25 52:5 52:15 53:16,22 54:3,18 55:8 55:11 57:2,9 58:9,17,18 59:8,10,12 59:19 60:13,15 61:22 62:3,11 63:1,4,10 64:4 64:24 65:7,11 65:13,16 66:3 66:9,19,22 67:23,24 68:5 69:3 70:13,17 74:11,18,25 75:5 76:11,17 76:23 77:15 78:7,11,22 79:2,12,14,21 80:7,11,12,13 80:22,22,23 82:11,12 83:14 83:16,17 84:12 85:7,22,24 86:9,10,19,19 86:23 87:15 88:6,13,13 89:3,12 90:5 91:2,7,12 92:12,15 93:3 93:3,5,12,25 94:7,7,21,25 95:11,11,17,19 96:4,11,24 97:6,6,13,14	98:2 100:1,21 101:22 102:2,4 103:19 104:24 105:1,2 106:3 107:6 108:1,17 108:21 109:2 109:17,22 110:5 111:20 111:24 thinking 12:3,6,6 12:6,7,16 13:18 38:7 71:20 72:2,5 96:16 thought 10:20,25 22:19 35:20 42:19 58:1,1,4 61:22 64:5,16 64:18 68:25 70:20 71:13 73:1 76:4,21 78:11 79:8 95:18 96:4,6 96:12 101:24 103:14 107:23 thoughts 81:2 thousands 101:2 threat 71:7 104:6 46:15 47:10,14 106:3,6 threats 69:16 72:11,19 three 4:18 35:11 75:1 thrown 44:13 thumbnail 13:8 tied 54:1 time 2:25 4:2 5:19 12:1,8 22:18 23:9,17 24:13,17 26:25 29:16 30:22 31:22 36:18,21 36:21 37:17,18 37:23 40:2 41:24 51:6 52:25 53:9,16 54:6,25 58:4 62:21 65:2 67:24 68:2,5 72:17,18 73:23 74:16 75:1 78:14 82:13 84:11 86:14 91:15,18 100:21 101:21 103:25 109:22 110:4 timeline 1:20 times 7:12,13 17:7 73:9,9,12 73:13 75:2 76:18 77:10,12 82:6 100:18 101:16 102:2 109:4 111:18	timing 51:20 54:22,23,24 55:3,14,16,22 56:11,15,21 57:8,19,24 61:8 69:12 83:24 84:1 titles 100:6 today 1:4,16 14:7 told 8:16 11:16 30:1 33:2 46:17 51:8,17 55:6,9 64:14 69:7,8,19,22 76:2 80:17 84:9 86:9,10 86:12 101:3 103:21 104:15 104:16 107:1 108:8 Tom 32:6 56:2 60:14 103:10 tone 62:20 64:1 70:1 71:7 92:12,22 Tony 16:22 25:5 25:16 27:14,18 27:19 28:14,23 29:8,11,15 31:19 34:2 40:8,14 50:17 93:25 94:3 top 55:18 topic 50:23 66:6 81:19 topics 49:10 top-slicing 90:10 top-up 10:9 Tories 6:14 41:4 53:16 Tory 41:25 58:11 109:20 totally 12:14 31:3 touch 81:20 touched 14:20 tradition 43:13 61:7 traditional 8:19 transaction 83:25 85:6,13 transcript 99:7 translation 37:17 transmitted 7:25 Transworld 100:9 trauma 106:14 traumatic 101:21 travelling 48:8 treated 100:7 tree 67:5 Trevor 32:5,11 39:17,18 40:9	44:12 56:2 tried 29:13,16 52:16 63:6 107:21 troops 44:3 true 2:20 7:7,9 15:16 18:23,24 18:25 19:14,15 20:6,9 31:1,25 40:14,18,21,23 41:10,11 42:18 53:18 67:11 73:10 77:14 85:22 94:1 95:8 98:20 104:20,22 105:3,9 trusted 94:13,16 95:24 truth 1:17 15:20 29:24 96:23 try 17:1,2,3 61:13,16,17 98:4 106:19 trying 6:17 16:17 25:19 31:5 39:5 43:10 50:4 71:20 96:10 98:9 110:20 Tuesday 77:10 turn 61:6 96:14 turned 110:3,12 111:1 turns 88:20 TV 74:9 twice 18:11 74:3 78:23 two 1:12 39:13 51:7 52:10 57:18 75:7 81:13 101:15 101:18 108:6	unelect 17:6 unelected 15:15 15:21,24 16:3 16:4 unfair 56:22 57:2,7 93:22 106:12 unfavourable 62:21 unhappy 54:7 unique 25:10 United 15:3 untrue 40:22 update 79:17 80:11,15 upset 106:11 urgently 62:5 use 24:24 60:3 60:19 91:10 111:21 uses 44:15 utility 96:21	vote 53:20 voted 68:10 voters 53:24 54:3 95:14 W waiting 20:5 38:1,3 want 10:19 12:12 12:16 13:18,19 31:12 41:14 68:18 78:17 85:3 91:5 95:16 98:8 112:3 wanted 10:17 13:15 26:10 42:12 47:7 50:6 61:25 63:10 94:19,21 95:21 96:13,16 102:10,12,23 103:15 104:13 108:20 109:15 wanting 96:7 wants 66:17 75:13 Wapping 37:15 37:25 38:11 war 52:2 warm 30:9 warned 105:5 warning 79:8 wasn't 7:17 15:7 19:5,5,9,11 20:3,4 23:9,17 24:14 25:10 28:11 29:22 30:20 31:13,16 38:4 41:3,23 42:16 47:2 49:8,11,19 53:9 55:10 60:5 64:7 67:23 68:6 70:20 72:1 75:6,18 84:10 89:8 92:11 94:1 96:15 101:4,4 107:21 107:24,24,25 109:9,24 111:6 waste 86:1 wasting 90:5 waters 91:5 way 4:5 8:15 18:2,7 26:7 27:21,21 28:10 29:19 31:23 33:7 37:11 40:16 42:21 43:13 57:8,11 59:4,19 64:5,8 84:12 85:17 89:1 91:11 93:14 98:7	99:14 100:7 110:24 111:8 ways 42:22 60:11 85:5 101:6 website 88:14 week 63:2,3 73:22 74:3 weekend 76:15 weeks 4:13,18 39:13 63:4 84:4 86:15,16 Weeting 2:18 weigh 72:2 weight 36:23 92:18 welfare 29:12 Wendi 45:13 went 35:15 47:9 49:18 61:14 79:22 88:16 93:12 102:24 106:16 weren't 28:6,20 29:3 30:7 32:8 32:10,13 36:15 47:14 49:21 81:11 88:11 100:22 we'll 23:21 40:19 76:6 81:20 104:8 106:15 111:25 we're 2:16 3:10 15:19 45:17 46:1 54:8 67:17 81:8 98:18 99:7 105:20 we've 17:7 39:2 59:12 68:21 76:5 82:15 84:17 87:12 101:3 111:17 Whelan 27:17 29:23 wholeheartedly 28:13 wholly 94:25 whomsoever 112:3 wide 95:13 widely 87:17 wider 54:8 92:8 widow 68:2 wife 61:23 92:2 wild 93:14 William 47:10 willing 52:4 win 52:14,24 53:12 70:8 wine 88:25 winning 107:10 107:11 wins 70:17 wish 33:7 37:12
--	---	---	--	---	---	--

wished 32:3	22:16 44:22	2001 36:12,17	50/50 31:1
wishes 25:24,25	53:3 100:21	2003 2:5 9:10	53 23:22
withdrawing	years 14:2,4	18:18 24:15	54 25:4
42:23	21:25 22:13	34:22 35:1,3	57 99:6,10,16
Witherow	24:12 25:7	91:9	
101:18	29:5,8 33:24	2004 29:14 40:2	<u>6</u>
witness 1:4,12	35:2 39:14	40:7	6 14:9 74:18 99:6
3:5 12:4,8 13:7	44:22 56:10	2005 19:17 36:12	61 28:25
13:22 14:20	58:11,19 69:18	36:18 37:2,11	
44:19 46:15	72:16,22 77:3	37:13 38:10,17	<u>7</u>
49:3,5,12	80:10 81:13,22	38:22,24 39:3	733 33:20
97:20	82:14 85:21	39:11 40:6	
won 104:24	90:23 91:2	42:6 43:16	<u>8</u>
107:4,6	97:11,12	46:2	8 14:7
wonder 98:17	107:25	2006 21:14	
wondering 43:4	year's 49:23,24	2007 8:17 28:15	<u>9</u>
44:10	Yelland 2:2	34:22 35:1,3	9 51:8,18 52:22
word 60:20 62:3	yellow 37:20,22	46:11 92:24	87:4
62:11,13,18	yesterday 17:8	2008 47:25 49:24	9.50 44:22
85:4 106:3,5	18:4 57:10	82:16	99 33:21
words 7:14,23	yielded 108:3	2009 2:9,10	
8:12 12:17	York 8:18	21:16,17 37:5	
43:6 78:4,19	<u>0</u>	41:4,6,9,15,17	
106:9 107:4	02577 3:6	41:22 42:4,11	
110:14 111:21	<u>1</u>	42:17 43:17	
work 3:25 4:4	1 1:13 33:13	50:11,23 51:3	
5:12 15:3	103:22 105:17	51:8,12,18,21	
31:20 34:14	1.02 112:12	52:9,22 58:13	
84:21 97:9	10 6:18 48:9,14	62:25 77:25	
worked 6:23	72:22 103:12	78:2,14	
47:10 67:11	104:16,23	2010 54:14 70:25	
working 96:4	105:13	71:20 73:20,24	
99:7	10.00 1:2	74:12,17,18,23	
world 1:23 2:1,3	100 32:25	77:18 79:1,19	
8:24 9:3,11,21	11 1:1 6:18 44:22	79:25 81:12,15	
11:15,17 14:4	99:10	87:4,12 88:22	
18:3,13,16	11.09 45:23	100:21	
19:7 36:14	11.21 45:25	2011 2:12 4:21	
45:8 46:23	12 13:7 69:18	4:22,24 6:3	
worse 29:10	73:13	23:5 77:23	
worth 100:1	13 35:1 69:18	78:1,4 99:8	
wouldn't 13:2	14 1:14 33:24	2012 1:1	
17:22 20:1	35:1 107:7	21 54:13	
28:8 37:10,11	1461 9:4	23 87:12 99:8	
58:3 70:23	1462 9:13	24 93:13	
72:6 78:17	15 2:14 4:25	24-hour 93:4,8	
79:14 84:6,20	15:13 16:3	256 18:19	
94:12 105:14	87:9 99:17	26 21:17	
written 25:20	15th 2:13	27 33:11 39:2	
46:15 53:7	17 2:12 4:25,25	<u>3</u>	
63:15 110:7	17th 5:1	3 32:19,21 50:11	
wrong 24:19	1989 1:23	50:23	
63:17 64:18	1995 1:25 24:10	30 3:5 41:6,9,15	
74:18 107:14	1997 28:11,14	41:22 42:17	
wrongly 56:19	33:11,13 36:12	51:12 62:25	
59:14	36:15,17 58:10	31 2:3 3:23	
wrote 13:24	1998 2:1	<u>4</u>	
<u>X</u>	1999 34:17 35:1	40 82:15	
X 11:1	<u>2</u>	40th 20:23 82:14	
<u>Y</u>	2 1:15,15 2:10	82:15	
yeah 18:15 19:23	108:9 112:11	42nd 19:21	
19:24 79:3	2000 2:2 9:10	<u>5</u>	
83:17	11:15	5 77:23	
year 1:14,15			

### Relationships with public figures

#### *General*

30. I have submitted to the Inquiry (RMB/1) a list of meetings with senior politicians (including political advisers and press officers) and senior representatives of the police service. The list is, however, based upon such limited documentation as I still have, primarily a diary kept by my former PA, which goes up to May 2011, supplemented by my memory. I am fully aware that the list may therefore be incomplete (particularly in comparison with the schedules submitted to the Inquiry by others) or inaccurate.
31. Since my departure from News International I have had no access to my work emails. However, the emails and texts that were on my Blackberry at the time I left News International were imaged and saved. These cover a limited period from the beginning of June 2011 until 17<sup>th</sup> July 2011. I have not been able to view all the emails for that period since a number were compressed and it was not possible to retrieve them. There is one email which might be relevant to the inquiry, which I attach as RMB/2. Apart from this, there is nothing in the emails that I have been able to view which is relevant to the inquiry. As regards my emails to my private accounts, there are none there which are relevant.
32. I have not included in RMB/1 references to attending party conferences, drinks receptions or awards ceremonies unless there is a reference to meeting with a specific individual. I often attended events where I would have spoken to many public figures about a variety of issues and I have not attempted to document these events. Also, in some instances I simply cannot now recall the extent to which, if at all, political topics were raised in the course of social events. It is not possible from my records to say who initiated the various meetings that I have listed or, sometimes, what the purpose or content of the meetings might have been. I have not recorded whether special advisers were present at any of the meetings with politicians, but it is likely that they will have been present during some of the meetings.

#### *Police*

33. I first met representatives of the police service when I became a senior newspaper executive. As a features writer I did not cover the crime beat nor did that function report to me as a features editor. I have met with the last four MPS commissioners: Lord Condon, Lord Stevens and Lord Blair, and Sir Paul Stephenson - some of them on several occasions. I have also met with other senior MPS figures. However, a lot of my contact with police officers stems from The Sun's fifteen-year sponsorship and support of The Police Bravery awards. At these events, I have met with many chief constables and police officers from the regions.

#### *Civil servants and press officers*

34. I have met a few civil servants, perhaps just the most senior of the day. The same goes for political press officers unless they accompanied a politician at a



meeting. My contacts on political issues were almost always with the politicians themselves although often SPAD's would be there. This probably stems from the fact that I only really became involved in political journalism when I had executive roles.

35. For as long as I have worked in the newspaper industry, I have observed, and then also been part of, the symbiotic relationship between the press and politicians. It is in politicians' interests to try and influence the electorate through the readership of the press, and it is in our interest to inform our readers of what is really going on in the corridors of Westminster. One defining aspect of journalism is the ability to tell many people what few people know. Full contact with senior public officials is a vital aspect of a newspaper's responsibility to its readers.
36. I don't know any journalist that doesn't want to meet a senior politician, or those that advise them, in the simple pursuit of what we do - the gathering, analysis and distribution of information.
37. Equally, I don't know any politician who doesn't want to meet a journalist or senior newspaper executive in the pursuit of what they do - the gathering of support for themselves and/or their policies. A lot of politicians wanted reader feedback and reaction to their policies or proposed policies. For instance, we were able to lobby a Chancellor of the Exchequer that a proposed change in policy, which would affect cheap flights, would be seen as a tax on the less fortunate - including many of our readers and the policy was withdrawn.
38. There is a common denominator, however, in both parts of this symbiotic relationship. It is that we are all accountable to the same constituents - the readers and the voters are one and the same.
39. The relationship inevitably produces tensions, but I believe that, for the most part, the tension works for the public good as it produces effective communication between the press and the political establishment shaping our readers' lives which, in turn, assists in the democratic process.
40. Over time, close association between politicians and journalists does produce a build-up of trust and confidence between them and, in some cases, friendship as well. When your area of work brings you close to others, it is inevitable that this will sometimes develop into friendship and it is not possible to legislate or regulate against this, nor is it desirable to do so. There can be nothing wrong with the fact that friendships are made from time to time, provided that professional duties are not undermined.
41. It is important to understand, however, that close and effective working relationships must not lead to compromise on either side. I have never abused my friendships to gain access to information that otherwise I could not have obtained as a professional journalist, nor have I ever compromised my independence through loyalty to a friend who is also a politician.
42. But whether a relationship develops into friendship or not, a relationship of trust and confidence between the press and politicians does have great value.

Where I have known a politician well, this has led on many occasions to a free and frank exchange of views as we have sought to change policy or better understand why the Government is taking a particular stance. If our relationship were always confrontational and antagonistic, we simply would not engage with politicians to that degree. Equally, an amicable relationship often helps, particularly in decisions in publishing stories of a personal nature.

43. In my various roles as a journalist and newspaper executive, I have met many politicians from every party, as well as those that advise them. I have met them on numerous occasions, and with varying degrees of regularity. At some point or other I must have met with every leading politician. This was to be expected, is no different to any newspaper editor and it has been this way for decades.
44. I got to know some politicians very well. I think I met first Tony Blair in 1995. The meetings at that time were all about getting to know him and his beliefs since it was fairly clear that New Labour would be elected. Over the succeeding years we met often, particularly during my time as Editor of *The Sun*.
45. I do not believe it is true that I was closer to politicians than other newspaper editors. I also made sure I met politicians from all parties. Similarly, I have generally felt that politicians were fairly even-handed in terms of the time they spent with journalists. For instance I do not know one Home Secretary who wasn't familiar with every Editor on Fleet Street. But of course the readership of some newspapers is more in sympathy with some political parties than others.
46. There are many examples I could use to demonstrate that the ability to obtain access to politicians has worked to the public good, for instance, the funding of Childline. The NSPCC contacted me to say that the Government were proposing to cut Childline's funding. *The Sun* was a great supporter of Childline and it was also relevant to Sarah's Law since that concerned targeted abuse in the home as well as paedophiles living in the community. To me, the fact that as a result of Government cuts an abused child's calls might go unanswered was unthinkable and I knew *The Sun* readers would be outraged by this when there was so much of tax-payers money wasted on bureaucracy that helped no one. I therefore sought meetings both with Gordon Brown and Tony Blair to try to persuade them to guarantee Childline's funding for the next few years, and *The Sun* campaigned on the issue as well. After initial resistance, they eventually agreed.
47. Another example relates to the now well-known disagreements between Tony Blair and Gordon Brown. Without close access to them, and those around them, the press would never have been able to discover, analyse and report on the political consequences of their growing rift.
48. There were many different kinds of meetings. In general, there wasn't a formal process to arranging meetings. Most often they were held at News International Headquarters in Wapping, but sometimes I would travel to Downing Street (or Chequers), the relevant ministry or wherever the politician



(whether government or opposition) was located for meetings. The Party conference season was, apart from its most obvious purpose, an annual opportunity for politicians to lobby journalists and vice versa. I have attended all the Labour and Conservative party conferences for fifteen years. News International hosted an annual party where the Prime Minister and the Cabinet would attend (or the Leader of the Opposition and Shadow Cabinet). The individual newspapers would host dinners and I would always have many meetings arranged over the three or four days and attend the major speeches.

49. Meetings were almost always about policy issues, sometimes at the invitation of the politician, and sometimes at our request. When a politician and his or her advisors came into the newsroom for a lunch, it was generally to address the Editor and senior journalists on that politician's policies or to debate a contentious issue between that particular politician and the newspaper.

#### *Hospitality*

50. I have been asked to deal with the question of hospitality. Before the Bribery Act came into force, it was not uncommon to buy political contacts small gifts e.g. wine or flowers as a thank you or for congratulations. Most contact was over lunch or dinner at Wapping, but there was some at restaurants where the newspaper would usually pay the bill.
51. One example is when I spent a lot of time working with the Paedophile Unit at New Scotland Yard as a result of the Sarah's Law Campaign, and would sometimes send them a case of wine as a thank you for what they did on a daily basis and what they had to witness. People, whether politicians or senior police officers, were taken to good restaurants that were appropriate to their seniority. As far as I was concerned, it was always proportionate and helped to foster the contacts and relationships that we developed.

#### *Prime Ministers*

52. I have been asked to detail my professional relationship with each of the Prime Ministers.
53. I first met Tony Blair in 1995 after he became leader of the Labour party. As the schedule shows, I met him at numerous political and social occasions, and these meetings increased in frequency throughout his decade as Prime Minister. I've had many formal, informal and social meetings with him, some of which I have been able to detail. We also spoke often on the telephone on a variety of issues and I do not have a record of these calls or the number of them.
54. Tony Blair, his senior cabinet advisers and press secretaries were a constant presence in my life for many years. It is true that some of these professional relationships resulted in social contact, but that is not surprising due to the thirteen years tenure. In the earlier years I became close friends with his wife Cherie Blair - who was a great advocate of women's equality - and also with the Blairs' closest advisers including Alastair Campbell and his partner Fiona Miller.

55. Although the inevitable tensions caused by my profession and our coverage were a constant source of disagreements, I remained in close contact with Tony Blair throughout his time in Downing Street. From 1996 to 2007 both the *News of the World* and *The Sun* backed Tony Blair and New Labour, although the newspaper was always a critical friend campaigning on behalf of our readers.
56. The Sun ran vigorous campaigns to persuade the Government to agree to a referendum on the EU Constitution and against the Euro. It would have been possible for Tony Blair to have taken offence over our treatment of him. Instead, he stood his ground and repeatedly told me that we would have to agree to disagree on Europe. Equally, the *News of the World* criticised Cherie Booth when she (and other instructed members of her chambers) defended the right of a paedophile to live near his victim. The *News of the World* also published stories concerning Peter Foster which were difficult and embarrassing for the Blairs. Issues would arise therefore from time to time which would test friendships but this is inevitable if people are doing their jobs properly. In my view, it would be completely inappropriate for any journalist to put a friendship with a politician before the interest of that journalist's readers.
57. In 2003, during the Iraq war, I spent more time than usual talking to Tony Blair and Downing Street. I believe this was due to our support of the Iraq invasion and the large military readership of *The Sun*.
58. I first met Gordon Brown in 1996 and then more frequently in the run up to the 1997 General Election. I was Deputy Editor of the *News of the World* and, like our sister paper *The Sun*, we were supporting Tony Blair and New Labour. Over the years I established a working relationship with Gordon Brown, Ed Balls and the Treasury. Gordon Brown would call every daily newspaper editor after each of his budgets (and on other occasions as well) to gauge opinion and have regular meetings with other Fleet Street journalists - I was no different.
59. I also established a close friendship with Gordon Brown's girlfriend, fiancée and then wife, Sarah. In fact it was during the announcement of their engagement in 1997 that I first advised Sarah on aspects of the media (*The News of the World* published, with their permission, the first photograph of them together).
60. We also worked on many charitable causes together including PiggyBankKids and the Jennifer Brown Research Fund, Woman's Aid and Domestic Violence and Maternal Mortality. Sarah devoted much of her time to her life as a campaigner and writer, often submitting authored pieces to our newspapers. I worked with Sarah to achieve publicity and public awareness for her campaigns and also wrote for her book 'Moving On Up'.
61. Our support of Tony Blair over the deepening hostility between him and Gordon Brown often made the relationship difficult. Although they were supposed to be on the same side, Gordon Brown viewed newspapers as 'his camp' or Blair's camp. My friendship with Sarah at least meant that for some



- while we continued to have a cordial working relationship, but in 2006 the famous 'curry house coup' left my relationship with Gordon Brown and 'his camp' quite hostile. Tony Blair and his aides were convinced that Gordon Brown and his aides had conspired together in order to force his early resignation. Gordon Brown saw *The Sun's* support for Tony Blair at this time as a betrayal.
62. However by 2008, I had known Sarah well for over ten years. Our friendship had strengthened through many difficult situations and tragic personal circumstances, and we were good friends to each other despite the conflicts that arose from the criticism by *The Sun* of aspects of Gordon Brown's tenure as Chancellor of the Exchequer or Prime Minister.
63. The year I turned 40, Sarah was concerned that I had not planned any birthday celebrations. That same year, both Elisabeth Murdoch and Wendi Murdoch also celebrated their 40<sup>th</sup> birthdays and so Sarah invited all three of us with some mutual friends to have dinner at Chequers and, due to logistics, to stay over that night and leave after breakfast. That is the extent of the so-called "slumber/pyjama party". Gordon Brown was not present at the dinner but he may have been there the next morning before we all left.
64. In the end, the events of Autumn 2009, in particular *The Sun's* coverage of Afghanistan and support for David Cameron, made it difficult for Sarah and I to be as close as we had been. Indeed, since the election in 2010, I believe we have only seen each other once at a mutual friend's wedding party.
65. I first met David Cameron, I believe, after he had been appointed Shadow Education Secretary. Thereafter, after he became Leader of the Opposition in December 2005, I met him with increased frequency. Like most formal meetings, I would often have our political editor present. Just as with Tony Blair and Gordon Brown, I met David Cameron at numerous political and social occasions (including working breakfasts, lunches, receptions, News Corporation summer parties, party conferences and dinners).
66. When he was Leader of the Opposition David Cameron and I spoke regularly on the telephone on a variety of issues, and I do not have a record of these calls or the number of them. Since Mr Cameron has become Prime Minister, however, I have not been to Downing Street. By then, I had become Chief Executive Officer of News International, and I had no reason to do so. I have had few formal meetings with David Cameron whilst he has been Prime Minister. When I have seen him, it has been mainly at social events, celebrations or other occasions.
67. Like other Prime Ministers, David Cameron's views and those of *The Sun* were often different and we had disagreements on policy.
68. I should add that my husband Charlie and David Cameron and his family have been friends for many years. I would say that, particularly since Charlie and I married in June 2009, David Cameron and I became friends, and he has been a personal guest of my husband and myself at social dinners (including on 19th December 2009 and on 23<sup>rd</sup> December 2010), and we have been to Chequers

(where many other media personnel, public figures and personal friends have of course also been). I have also met him at the homes of other personal friends and family.

The loan of the retired police horse

69. I have been asked by the Inquiry to deal with the loan of a retired police horse by the Metropolitan Police Service. During a holiday with my husband, we had been told about these retired horses and that, due to their tough lives on the front line, it was often difficult to retire them properly as they need expensive veterinary care and experienced riders. Months later, at the end of a lunch with Sir Ian Blair, I asked about the plight of police horses and I was offered the chance to visit Imber Court – the HQ of the highly professional Mounted Branch. I was subsequently interviewed, and our farm assessed, and it was agreed by the Mounted Branch we should be loaned a retired police horse. I note that Lord Blair does not recall this conversation. There is no reason why he should. The main purpose of the lunch was to discuss the IPCC report into the Stockwell investigation.

Media influence on public policy and decision-making

70. I have been asked to deal with a number of specific issues.

General Elections

71. Rupert Murdoch did of course have strong views about the stance that his newspapers would take in a General Election and it is not possible that an editor of *The Sun* or the *News of the World* would support a party in an election without discussing it with him. He would always listen to opinions from his senior executives – one of his many strengths – and, if presented with the right argument, he would change his mind. But equally, and more importantly, the stance that a newspaper took was also influenced by its readership. Rupert Murdoch would always ask about the readers and what they thought and what was in their best interests.
72. Though *The Sun* had supported New Labour for many years, a number of issues – Gordon Brown's return to Old Labour and his woeful support for the war in Afghanistan, the size of the bank bailout, the renegeing on the promise of a referendum on the European Constitution – meant that, by the spring of 2009, we realised that the paper had run out of things to say in support of Gordon Brown's Government.
73. On so many issues, we found we were attacking the Government and calling for an election to encourage Gordon Brown to go to the electorate and get his own mandate. It was fairly inevitable that we would end up supporting David Cameron, and we chose to show our support for him the day after Gordon Brown's Party Conference Speech in September 2009. Although, by then, I had become CEO of News International, I was instrumental in our change of stance along with Dominic Mohan, *The Sun* political team and of course Rupert and James Murdoch. As the Inquiry has heard, Rupert Murdoch was



of the view, which we shared, that *The Sun* should withdraw its support from the Government.

74. I have been asked about the effect of the editorial stance of a newspaper on the conduct and outcome of General Elections and other national polls. I do not think that newspapers fundamentally change the outcome of elections, particularly with the digital and multi-media choices available now. The significance of a newspaper's stance is for a different reason — it is an early indication of the outcome of an election since it reflects as far as it can the views of its readership. The stance that *The Sun* takes has always been regarded by politicians as important because the newspaper is not partisan — it is said that it has a large number of floating voters. When we concluded, therefore, that our readers had lost confidence in Gordon Brown's Government it was a significant moment, because it reflected the mood of our readership. I don't remember one politician not asking for support from *The Sun*.

#### Campaigns

75. I have also been asked to deal with how and why newspapers run campaigns. Newspaper campaigns are hugely important, and effective, in providing a vehicle for the concerns and wishes of readers. Without such campaigns, members of the public are often simply not heard. Campaigns formed an essential part of my newspaper career, and led to me engaging very closely with public figures in the type of private meeting to which I have already made reference. Plainly, none of them were concerned with the commercial or business interests of News International or News Corp.
76. We did, of course, gauge public feeling on particular issues by seeing how well the papers sold. There were failures, as well as successes. Sometimes, we simply failed to capture the interest of our readers; on other occasions, we delivered our message badly. I ran a campaign against racism towards immigrants, but some of our message backfired, and the readers didn't like the lecturing tone and politically correct nature of the campaign.
77. But other campaigns worked well. There were many campaigns by the *News of the World* and *The Sun*. Those with which I had the most involvement with are:
- a. Sarah's Law
  - b. Help For Heroes
  - c. Baby P
  - d. Madeline McCann
  - e. Malaria No More
  - f. Europe
  - g. Domestic Violence
  - h. Make Poverty History
  - i. Academy Schools

- j. Comic Relief
- k. MRSA
- l. Victims of dangerous driving
- m. Victims of knife crime
- n. Postcode lottery for Breast cancer
- o. NHS reform
- p. Overcrowded prisons
- q. Welfare reform
- r. Fathers for Justice
- s. Sun Employment

78. I deal in more detail with some of these campaigns below.

77. The most significant campaign that I ever ran was the Sarah's Law Campaign. I became personally involved because I felt a strong sense of injustice on behalf of Sarah Payne and her family. Although Roy Whiting was on the Sex Offenders Register, no members of the public had access to it and so he and other serious paedophiles were allowed to live unchecked in society, notwithstanding that the rate of recidivism in serious paedophiles is around 87%. Roy Whiting lived near Sarah Payne's grandparents and had a previous conviction for abducting and sexually assaulting an 8-year-old girl. I felt that we should do something about the fact that paedophiles were living unchecked in this way.

78. We began a campaign of naming and shaming paedophiles. I accept that this could have been done better with more time but I balanced that with a need to highlight this issue while the readers were aware of the story. Some people were included in the list that should not have been grouped with serious paedophiles. There were risks of vigilantism. Yet I had looked at the success of Megan's Law in the United States, which was similar to the law that we were proposing, and in the case of Megan's Law there were almost no examples of vigilantism.

79. After a couple of weeks we stopped the naming and shaming and the government agreed to close all the loopholes in the law which allowed paedophiles to remain unchecked in the community. That happened, and in certain defined cases of someone who has regular, unsupervised access to children, it is now possible for parents to find out whether that individual has a record for child sex offences. In total 15 new pieces of legislation were introduced as a result of the campaign.

80. When I was Editor of *The Sun*, we always supported and campaigned on behalf of the Military and in particular the Armed Forces. I spent a lot of time with the Secretary of State for Defence and with the Chiefs of the Armed Services. I spent some time in Afghanistan and was pleased to see how our support for the troops helped morale. In October 2007 we launched a campaign for a charity called Help For Heroes. Soldiers who had suffered

wounds in theatre particularly from IBDs were suffering poor aftercare once their immediate medical needs had been dealt with. In particular, at that time the rehabilitation centre Hedley Court needed a huge injection of funds to cope with the injuries coming from Afghanistan. The campaign has been hugely successful. I think to date the charity has raised well over 100 million pounds. After a dinner with the Prince of Wales – he suggested that we also fund and organize an annual awards ceremony to praise all aspects of the military. This is now known as the Sun's Millics and is supported greatly by the Prince of Wales, The Duchess of Cornwall, The Duke and Duchess of Cambridge and Prince Harry, as well as politicians from all parties.

81. Our domestic violence campaign influenced the Domestic Violence, Crime and Victims Bill 2005. As a direct result of our work with Sandra Horley at Refuge and Women's Aid, with Gordon Ramsay and Sarah Brown and from receiving letters from women readers suffering from domestic violence, we campaigned regularly between 2003 and 2005 to tighten up the law on common assault and restraining orders. The Sun's campaign was praised by the police, the Home Secretary and relevant charities.
82. Finally, I should mention the campaign concerning the response of Haringey Council to the failings over the Baby P case. We ran a campaign demanding the resignation of those that we felt were most responsible: Sharon Shoesmith, the social workers and the doctor. Baby Peter sustained over 50 injuries during an eight-month period in which he was repeatedly seen by Haringey Children's Service and NHS professionals. The campaign had enormous traction with our readership and we were able to deliver a petition signed by 1.5 million people to Downing Street calling for their resignations. The decision of Social Services to allow a "step-father" who was on a charge of raping a two year old to continue living in Baby P's house was a cataclysmic failure and the reaction of our readership does demonstrate that we were right to call for personal responsibility to be taken by Ms. Shoesmith.
83. I have been asked about the risks associated with campaigns, and I have already referred to the risks of vigilantism in connection with the paedophile campaign. With the campaign concerning Haringey Council I am sure that we tapped into and reflected the public mood, but we were criticized for being tough and harsh and some will say that we should have acted with more restraint. The biggest risk is to launch a campaign that the newspaper's readers have no interest in, because this means you have misjudged them. Also I accept that there is an associated risk that campaigns can be seen, wrongly, as 'media witch hunts'.

#### *Public and political appointments*

84. I have been asked to what extent my views were sought or offered on cabinet appointments. I think the genesis for this question must be stories that have appeared in the past that a particular Shadow Minister had been replaced at my request. This is myth. I had no influence over the appointment of any minister, shadow or otherwise. I have never sought it, and it is preposterous to think that a Prime Minister or party leader would be dictated to by me. From time to time all newspapers, including those that I edited, might campaign for



political resignations but this is completely different. Politicians too would talk to me about our readers' perception of them, no doubt as part of a process of gathering information. But that was the limit of it.

85. With regard to appointments of other public figures, from time to time *The Sun* has argued that individuals should be sacked or resign or be suspended. I cannot say what influence these articles had on their futures; each case is different. What I do believe, though, is that in each instance we were reflecting the public mood after wrongdoing had been exposed.

*The Data Protection Act reform*

86. I have been asked about the extent to which I, or anyone on my behalf, made representations in relation to the development of policy concerning the Data Protection Act 1998. I believe the issue is whether or not the change in the law introducing custodial sentences for offences against Section 55 of the Act was to be brought into force.
87. I have only my recollection of this issue as I do not have any records. I know that Les Hinton, when he was Chief Executive Officer of News International, together with Murdoch MacLennan and Paul Dacre had been lobbying against the new provision from their industry roles. I took over Les Hinton's role when he went to the United States to become Chief Executive Officer of Dow Jones. My recollection is that the three of us met with Jack Straw and he seemed sympathetic to our views. Any notes concerning these meetings will be held now by News International, Associated Newspapers or Telegraph newspapers. This was an example of industry lobbying for a perfectly proper purpose.

*BSkyB*

88. I have been asked the extent, if any, to which I discussed with any member or representative of the Government the possibility of News International acquiring a larger stake in BSkyB in 2010-2011. I have been asked particularly about discussions that I might have had with either the Prime Minister in October or December 2010 or with the Chancellor of the Exchequer in December 2010.
89. I think that I should clear up a common misconception. The BSkyB bid was a bid by News Corp, not News International. I was not on the Board of News Corp and I had no formal role in it. I was not therefore directly involved in the strategy or discussions concerning the bid, although of course I was made aware of the general position and was at times emailed, or copied into emails, about it (as Exhibit RMB/2 shows). I certainly attended internal meetings about it.
90. There did come a point, however, when the perception was that it was News International that was bidding for BSkyB, and inevitably, as its Chief Executive, I found myself drawn into the debate. As might be expected, many people sought to raise the issue with me, and I became involved in defending the bid to them. I cannot now recall all the occasions when the bid was

discussed, but it would have included the October 2010 Conservative Party Conference (as Exhibit KRM/19 suggests). When the matter arose in conversation, I am sure that I would have expressed my views forcefully, particularly given the vocal opposition. I have no doubt whatsoever that opponents of the bid were doing likewise.

91. At no point did I ever have an inappropriate conversation with anyone who had any influence over what the Government might do. The formation of the anti-Sky bid alliance was unprecedented - I think it involved the BBC, *The Guardian*, *The Financial Times*, *The Telegraph*, *The Daily Mail* - nearly all the media groups apart from News International. Other commercial rivals like British Telecom also joined the alliance. It was in this climate that conversations took place as many of these media companies were using their own publications or broadcasts to convey their opposition.
92. With regard to the suggestion that I had 'discussions' with David Cameron and George Osborne, I am sure I did refer to the issue generally but it would have been in the context of the anti-Sky bid alliance and not specifically on detailed matters concerning the bid. I am reminded by Exhibit KRM/18, and the emails on page PROP100001679, that I emailed Frederic Michel, in response to an email from him on 14<sup>th</sup> December 2010, stating "*Same from GO - total bafflement at response*". This seems to refer to the Ofcom 'issues letter' that had been sent out a few days before.
93. I cannot recall sending this email, but I presume that 'GO' was a reference to George Osborne, whom, according to the records that I have, I had seen socially the previous evening. The email clearly shows that whatever was discussed was brief and inconsequential. The issue was topical, and of course everyone would have known that, as the CEO of News International, I would have been likely to support the bid.

#### *Education Sector*

94. I have been asked about Mr Rupert Murdoch's interest in UK education centres, with particular reference to a visit to East London to inspect a site where Mr Murdoch was said to have offered to build an Academy School.
95. News International had a significant community social responsibility remit. Rupert Murdoch wanted to give something back to the poorest areas of the East End where News International was based. The idea was to establish a school for 3-18 year olds, which would also be a centre for media excellence. I had many meetings with both Michael Gove and Boris Johnson concerning the project and spent a lot of time visiting children's schools and meeting pupils in connection with the project. I hope that one day the project will become a reality, but obviously since July last year I have had no further part to play in it.



Andy Coulson

96. I have been asked to set out full details of all advice sought or offered by me in relation to the appointment of Andy Coulson with particular reference to a story that I dissuaded David Cameron from appointing Guto Harri to the post.
97. This is another myth. The first I heard of the possibility of Andy Coulson being appointed to the role was from Andy Coulson himself. By this time Mr Coulson had left News International. Mr Coulson told me the idea had come from George Osborne. At no point in the process did either David Cameron or George Osborne seek my views about his suitability before his appointment.
98. As for Guto Harri, I had no idea that he was a contender for the job. I know Guto and have the highest regard for him. If I had been asked for my view about Guto Harri, I would have only said positive things about him.
99. Finally, this particular allegation, one of many that had been made about me, does give rise to a wider point. It is one thing to be a passionate advocate of a free press, but if you seek to defend an inaccurate free press, you lose the moral high ground. I think that if the press do get it wrong, then there is a responsibility on them to correct their inaccuracies, otherwise these myths and false stories continue to be published unchecked and then to circulate to a wider audience through the Internet. Correcting inaccuracies does not cost a great deal for the press, yet it is given a low priority and minimal projection. I recognise that the newspapers that I edited are as much at fault as any other in this respect.
100. On the issue of fault, I would like to return to this inquiry when I can speak more freely. It would be disingenuous of me to not confront the failings of the press while defending the right of a free press. Through my experience as a working journalist for 22 years, and as a CEO of a media group handling a corporate crisis I believe that I am in a unique position to comment on future regulation, ethics and practices of the press. In the last nine months of my life I have had little proper opportunity for a full right of reply. Due to my current situation it is still impossible for me to reply in detail.

I believe that the facts stated in this witness statement are true.

Signature

Dated

*Jon May 2012*



# **EXHIBIT P**

<p>1 Monday, 11 June 2012</p> <p>2 (10.00 am)</p> <p>3 (Proceedings delayed)</p> <p>4 (10.15 am)</p> <p>5 LORD JUSTICE LEVESON: I am today handing down rulings in</p> <p>6 relation to the application made concerning Operation</p> <p>7 Motorman and in relation to costs.</p> <p>8 When this Inquiry was established last July, it was</p> <p>9 extremely important that it had the benefit of</p> <p>10 cross-party support and it is equally important that it</p> <p>11 conducts its work so as not to undermine the basis upon</p> <p>12 which it was established.</p> <p>13 Two weeks ago, the former Prime Minister,</p> <p>14 Mr Tony Blair, gave evidence. This week, I shall be</p> <p>15 hearing from others who are or who have been the leading</p> <p>16 politicians of the day. They come from different</p> <p>17 parties, with different political allegiances, and</p> <p>18 already there has been demonstrated intense public</p> <p>19 interest in what they will be asked and what they will</p> <p>20 have to say.</p> <p>21 It is vital to bear in mind that the Inquiry is</p> <p>22 grounded in the terms of reference announced when it was</p> <p>23 set up. These include:</p> <p>24 "1. To enquire into the culture, practice and</p> <p>25 ethics of the press, including (a) contacts and the</p> <p style="text-align: center;">Page 1</p>	<p>1 and journalists have treated politics and politicians in</p> <p>2 ways that are designed to keep or have the effect of</p> <p>3 keeping the press insulated from criticism, from being</p> <p>4 held accountable by anyone, so as to ensure that there</p> <p>5 is no political will to challenge their culture,</p> <p>6 practices or ethics.</p> <p>7 To be more specific, the purpose of this Inquiry is</p> <p>8 not to challenge the present government or the decisions</p> <p>9 taken in the recent past, but to look at the much wider</p> <p>10 sweep of history across party political boundaries in</p> <p>11 order to discern any patterns of behaviour that could</p> <p>12 not be recognised as fitting with the open, fair and</p> <p>13 transparent decision-making that our democracy requires.</p> <p>14 Inevitably, as I've already explained, the way in</p> <p>15 which the BSkyB bid was addressed is a small but</p> <p>16 significant part of the story. To the extent that there</p> <p>17 are political questions that Parliament wishes to</p> <p>18 investigate, I repeat that nothing I say or do is</p> <p>19 intended to limit or prevent that investigation from</p> <p>20 taking place. I do hope, however, that it will be</p> <p>21 appreciated that this issue is merely the most recent</p> <p>22 example of interplay between politicians and the press,</p> <p>23 and that it will be recognised by everyone that failure</p> <p>24 to address the impact of press behaviour or the</p> <p>25 consequences of press interests is not confined to one</p> <p style="text-align: center;">Page 3</p>
<p>1 relationships between national newspapers and</p> <p>2 politicians and the conduct of each ..."</p> <p>3 And 2:</p> <p>4 "To make recommendations ... (b) for how future</p> <p>5 concerns about press behaviour, media policy, regulation</p> <p>6 and cross-media ownership should be dealt with by all</p> <p>7 the relevant authorities, including, among others, the</p> <p>8 government; (c) as to the future conduct of relations</p> <p>9 between politicians and the press."</p> <p>10 The present focus is on the press and its</p> <p>11 relationship with politicians. I am specifically not</p> <p>12 concerned and am very keen to avoid inter-party politics</p> <p>13 and the politics of personality. I am simply not</p> <p>14 interested in either.</p> <p>15 Further, however much some might want me to</p> <p>16 investigate all manner of issues, I know that all of</p> <p>17 this week's witnesses are equally keen to ensure that</p> <p>18 the Inquiry itself remains on its correct track. That</p> <p>19 track relates not only to the undeniable importance of</p> <p>20 the role of the press in a democratic society and the</p> <p>21 ways in which the press serve the public interest, but</p> <p>22 also the privileges that are claimed as a consequence in</p> <p>23 the way in which that role is fulfilled in practice.</p> <p>24 It also relates to the other side of the coin, which</p> <p>25 is the extent, if at all, to which proprietors, editors</p> <p style="text-align: center;">Page 2</p>	<p>1 government or one political party. For that reason, it</p> <p>2 remains essential that cross party support for this</p> <p>3 Inquiry is not jeopardised much.</p> <p>4 So far as the terms of reference are concerned, in</p> <p>5 the same way that I recognised in Module 2 that there</p> <p>6 are bound to be entirely acceptable social and</p> <p>7 professional relationships between police officers and</p> <p>8 journalists, so my aim for this module is first to</p> <p>9 recognise that there are entirely appropriate social</p> <p>10 relationships between politicians and journalists,</p> <p>11 doubtless borne of friendship and equally entirely</p> <p>12 appropriate professional relationships between</p> <p>13 politicians and journalists as the former seek to</p> <p>14 promote their policies and their message while the</p> <p>15 latter seek to ensure that politicians and their</p> <p>16 policies are held fully and properly to account.</p> <p>17 Secondly, it is also to recognise the risk that in an</p> <p>18 effort to keep the press onside, supporting promoted</p> <p>19 policies that are firmly believed to be in the public</p> <p>20 interest, rather too much attention may be paid by</p> <p>21 governments to the power that the press can exercise</p> <p>22 pursuing its own agenda, particularly where that agenda</p> <p>23 is agreed by the entire press or at least a significant</p> <p>24 powerful section of it. That might include questions</p> <p>25 relating to the provision of redress, particularly for</p> <p style="text-align: center;">Page 4</p>

1 (Pages 1 to 4)

<p>1 the weakest in our society.</p> <p>2 In that regard, I anticipate questions will be asked</p> <p>3 about the draft criteria for a solution which has been</p> <p>4 published on the Inquiry website, not to commit any of</p> <p>5 the party leaders giving evidence but rather to hear</p> <p>6 their perspective on the problems to be addressed in</p> <p>7 relation to problems culture, practices and ethics of</p> <p>8 the press and in relation to any unintended consequences</p> <p>9 which they have spotted but I may not have considered.</p> <p>10 Nothing I say shall be taken as expressing any concluded</p> <p>11 opinion: testing ideas with witnesses is doing no more</p> <p>12 than testing ideas.</p> <p>13 I add only this. It may be more interesting for</p> <p>14 some to report this Inquiry by reference to the politics</p> <p>15 of personality or the impact of the evidence on current</p> <p>16 political issues. That is not my focus, and as ever,</p> <p>17 I'll be paying attention to the way in which what</p> <p>18 transpires is in fact reported. This week will not</p> <p>19 conclude the evidence for Module 3, although we will not</p> <p>20 be sitting next week, thereafter it is intended to call</p> <p>21 further witnesses from the media to deal with the</p> <p>22 relationship between the press and politicians, not</p> <p>23 least to see if, in their perception, there are issues</p> <p>24 that need to be resolved and changes made.</p> <p>25 We will then turn to Module 4, which concerns ways</p> <p style="text-align: center;">Page 5</p>	<p>1 MR DAVIES: It's simply this. We would like to see the</p> <p>2 questions which those -- which some of the witnesses are</p> <p>3 answering in the cases where they have not quoted the</p> <p>4 questions in their witness statements. What has</p> <p>5 happened is this: most of the witnesses who have given</p> <p>6 evidence recently have been responding to Section 21</p> <p>7 notices from the Tribunal. Most of them have chosen to</p> <p>8 set out the questions in their witness statements and</p> <p>9 then to answer them. In one or two cases, I think they</p> <p>10 have exhibited the Inquiry's notice. In either case,</p> <p>11 one can see exactly the question being answered and</p> <p>12 relate the answer to the question.</p> <p>13 However, there have been a handful of cases where</p> <p>14 the witnesses have chosen to answer the questions</p> <p>15 without setting them out or exhibiting them. That is no</p> <p>16 criticism at all of the witness, but it does make it</p> <p>17 very difficult for those seeking to understand in detail</p> <p>18 what their evidence is to reach a full appreciation of</p> <p>19 it.</p> <p>20 A particular example of this was in fact Mr Blair,</p> <p>21 whose statement has a heading, "Turning to the</p> <p>22 particular questions", which then runs on for several</p> <p>23 pages, but he doesn't set them out and he says things</p> <p>24 such as, "I do not recognise any of the quotes I have</p> <p>25 been asked about", so we don't know what they are.</p> <p style="text-align: center;">Page 7</p>
<p>1 forward for the future. During the course of that</p> <p>2 module, I look forward to hearing how the industry has</p> <p>3 progressed with the plans that Lord Hunt outlined as</p> <p>4 long ago as 31 January 2012. I also look forward to</p> <p>5 considering the various other suggestions for the</p> <p>6 replacement of the PCC that have been submitted in</p> <p>7 detail to the Inquiry. It was on 17 May that I sought</p> <p>8 to provide some assistance for those intending to make</p> <p>9 submissions by publishing on the Inquiry website what</p> <p>10 are possible or potential draft criteria for an</p> <p>11 effective regulatory regime -- that is why they are</p> <p>12 called draft -- along with some key questions for</p> <p>13 Module 4, relating to public interest and press ethics.</p> <p>14 The purpose of doing so has been and remains to</p> <p>15 encourage everyone to consider the issues that I must</p> <p>16 think about and to welcome comments and suggestions.</p> <p>17 I repeat that I retain an open mind as to the</p> <p>18 future. All ideas will be subject to scrutiny and</p> <p>19 I have no doubt will help to inform the conclusions that</p> <p>20 I reach and the recommendations that I ultimately make.</p> <p>21 Thank you.</p> <p>22 I'm sorry for the delay in commencing the</p> <p>23 proceedings.</p> <p>24 MR DAVIES: Might I raise a point, sir?</p> <p>25 LORD JUSTICE LEVESON: Yes.</p> <p style="text-align: center;">Page 6</p>	<p>1 LORD JUSTICE LEVESON: All right, I understand that.</p> <p>2 MR DAVIES: We've been in correspondence with the Inquiry</p> <p>3 about this and the answer we've received is that</p> <p>4 correspondence -- the Inquiry's correspondence with</p> <p>5 witnesses is confidential. Now, it does appear to us</p> <p>6 that that simply cannot apply in this instance, and</p> <p>7 given that the vast majority of witnesses have set out</p> <p>8 the questions their answering, there can't be anything</p> <p>9 confidential in the remaining cases.</p> <p>10 And there arises to a lesser extent but also with</p> <p>11 Mr Brown, whose evidence we're about to hear, so we</p> <p>12 would ask for the questions in those two matters and any</p> <p>13 others where it arises.</p> <p>14 LORD JUSTICE LEVESON: All right, thank you.</p> <p>15 MR CAPLAN: Might I just support that, please.</p> <p>16 LORD JUSTICE LEVESON: Yes.</p> <p>17 MR JAY: I'll think about it and come back to you at</p> <p>18 a convenient moment.</p> <p>19 LORD JUSTICE LEVESON: Very good, thank you very much.</p> <p>20 Right.</p> <p>21 MR JAY: Sir, may I call this morning's witness, the Right</p> <p>22 Honourable Gordon Brown, please.</p> <p>23 LORD JUSTICE LEVESON: Thank you very much.</p> <p>24 MR GORDON BROWN (sworn)</p> <p>25 Questions by MR JAY</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 MR JAY: Mr Brown, your full name, please?</p> <p>2 A. James Gordon Brown.</p> <p>3 Q. You've provided us with a witness statement dated 30 May</p> <p>4 2012. It has the standard statement of truth and you've</p> <p>5 signed it. Is this your formal evidence to our Inquiry?</p> <p>6 A. Yes, it is.</p> <p>7 LORD JUSTICE LEVESON: Mr Brown, thank you very much for the</p> <p>8 work that's obviously gone into the Inquiry. I'm sorry</p> <p>9 that our start this morning has been slightly delayed.</p> <p>10 A. It's fine by me. Thank you very much,</p> <p>11 Lord Justice Leveson.</p> <p>12 MR JAY: Mr Brown, may we start your general comments, which</p> <p>13 I'm going to ask you to elaborate. On the bottom of the</p> <p>14 first page of your statement, our page 14207, you refer</p> <p>15 to securing the right balance between the freedoms of</p> <p>16 the media and the privacy of the citizen. Implicit in</p> <p>17 that is the premise that there is an imbalance at</p> <p>18 present, but how do you rectify the imbalance without</p> <p>19 impinging on the freedoms of the media?</p> <p>20 A. I think the starting point of all this has been the cri</p> <p>21 de coeur, if you like, the complaint that has been made</p> <p>22 by a family like the Dowler family, and they would</p> <p>23 support, I have no doubt, the freedom of the press, but</p> <p>24 they're worried about the threat that was made to their</p> <p>25 privacy as individuals, and I think Lord Justice Leveson</p> <p style="text-align: center;">Page 9</p>	<p>1 he said, "Yes, there is", and the next day the editor of</p> <p>2 the best-selling daily newspaper in this country arrived</p> <p>3 wanting an interview about how this man was the greatest</p> <p>4 statesman in the world, and so that is not, I think, the</p> <p>5 best way that the press exercises its freedom.</p> <p>6 I would defend the right of the press also, even</p> <p>7 when it gets things wrong, as it does on occasions and</p> <p>8 in circumstances. I remember when I started off as</p> <p>9 a Member of Parliament, I was plagued for the first two</p> <p>10 years with a story in the Times that was then in every</p> <p>11 one of the cuttings that said — I was a new MP, of</p> <p>12 course, I was only in my early 30s. It said I had been</p> <p>13 born in 1926. It said I was a veteran, a stalwart, and</p> <p>14 then I was getting letters from pension companies saying</p> <p>15 that you had entered a new job late in life and were</p> <p>16 about to retire", and would I want to make provision for</p> <p>17 that? And the Times had gone into the House of Commons</p> <p>18 and had a photograph of me at the age of 19 and said</p> <p>19 that I was 57 years old.</p> <p>20 That was an honest mistake. Where I think we have</p> <p>21 a problem is in two respects. The freedom that the</p> <p>22 press has has got to be exercised with responsibility.</p> <p>23 Rights in our society can only come with</p> <p>24 responsibilities attached to them, and in two very</p> <p>25 specific areas in Britain today, we have a problem.</p> <p style="text-align: center;">Page 11</p>
<p>1 put it: who will guard the guardians? was a question</p> <p>2 which he wanted to address. I will say: who will defend</p> <p>3 the defenceless? We have to provide answers in</p> <p>4 a situation where we have two freedoms that are</p> <p>5 competing with each other.</p> <p>6 Perhaps I've had some time to reflect on these</p> <p>7 matters. You might call it a period of enforced</p> <p>8 reflection courtesy of the British people, but I've had</p> <p>9 a chance to look at some of these issues, and I would</p> <p>10 still hold to the view that really came from my</p> <p>11 religious upbringing, that the media, one of those</p> <p>12 institutions in society that have not only a right but</p> <p>13 a duty to speak truth to power, that they should</p> <p>14 continue to shine a torch on those dark secret recesses</p> <p>15 of unaccountable power and that, for example, in the</p> <p>16 great Sunday Times campaign on the thalidomide was</p> <p>17 proven to be the right thing to do.</p> <p>18 I would say that at its best, the media in this</p> <p>19 country is indeed also the best in the world, and</p> <p>20 I would defend the right of the media to exercise</p> <p>21 a freedom, even when there is a political bias.</p> <p>22 I was phoned up by a prime minister during the</p> <p>23 period I was in Number 10 when he was having great</p> <p>24 trouble with his other colleagues around Europe, and</p> <p>25 he — I said, "Is there anything I can do to help?" and</p> <p style="text-align: center;">Page 10</p>	<p>1 The first is the conflation of fact and opinion,</p> <p>2 which is of course totally against the Press Council</p> <p>3 guidelines, and I think we ought to explore that, how</p> <p>4 standards in journalism could be upheld in a situation</p> <p>5 where there is a tendency for newspapers in particular</p> <p>6 to editorialise outside their editorial content.</p> <p>7 And the second is the thing is the question that the</p> <p>8 Dowlers put to us: how can we defend the privacy of</p> <p>9 a family who at their moment of greatest grief and at a</p> <p>10 time when they're at their most vulnerable have their</p> <p>11 privacy invaded by the press in a way that splits the</p> <p>12 family apart and makes everybody in that family</p> <p>13 suspicious of each other, and particularly so since it's</p> <p>14 been done by unlawful means, which include telephone</p> <p>15 tapping.</p> <p>16 You can deal with the legal issues by enforcing the</p> <p>17 law. I don't think the complaint system has ever worked</p> <p>18 properly, so I don't think the Dowlers could have</p> <p>19 expected to get redress from a complaints system, but</p> <p>20 I think — and this is where I suppose I part company</p> <p>21 with some the statements that have been made so far to</p> <p>22 the Inquiry — I think there is an issue not just about</p> <p>23 rooting out the bad and how you discipline and sanction</p> <p>24 where mistakes are made that are injurious to family</p> <p>25 life. I think we have to have some means by which we</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)

<p>1 incentivise the good as well. In other words, if the 2 standard of journalism declines, and I think there is an 3 issue in the Internet age about declining standards, we 4 must have a means by which we incentivise the good. 5 Q. Thank you. You mention freedom with responsibility, you 6 mentioned it in your witness statement as well. How 7 does one instill or ferment the necessary cultural 8 change in the press to create that responsibility? 9 A. I think in the first case it is a matter for the press. 10 I think it's a matter about – of upholding standards of 11 journalism. 12 I was – funnily enough when I was very young, 13 editor of my student newspaper at Edinburgh University 14 and it was successful, we had as rector of our 15 university at that time Kenneth Allsop, who was one of 16 the greatest journalists, I think, of that period, and 17 I used to debate with him this issue about the 18 responsibility of the press and I'd rely on him because 19 he influenced my judgments very much on this issue. And 20 he said very clearly that the press had to exercise its 21 judgment about what it published, how it framed its 22 coverage but also how it conflated fact or opinion or 23 avoided doing so with responsibility. I don't think we 24 do enough to encourage the good. 25 If I can say what I think the problem is – and it</p> <p style="text-align: center;">Page 13</p>	<p>1 from the ordinary news media to the Internet, and the 2 question arises then: who is going to sponsor, who is 3 going to pay for, who is going to be the person that 4 underpins quality journalism? And I believe therefore 5 that we have to look not only at mechanisms by which we 6 deal with abuses in the press, we have to look at 7 mechanisms by which we can enhance and incentivise good 8 standards. 9 The BBC found a way to do it in the 1940s when they 10 introduced the licence fee. Perhaps that licence fee 11 should be available for the internet and for 12 publications that go beyond broadcasting. I think 13 there's a huge debate to be had, but you cannot ignore 14 a fact that the holder for the coverage of news now is 15 intimately related to the development of the Internet, 16 and if standards are not there on the Internet, then the 17 print media can rightfully say that they're being asked 18 to observe standards that in no circumstances are being 19 applied to the Internet. So the issue, I think, is 20 a new one, and it's one that we have to deal with the 21 transformation of the technology that is now available 22 to us and the information flow that is absolutely 23 massive for the ordinary member of the public. 24 Q. You refer to the conflation of news and comment. 25 A. Yes.</p> <p style="text-align: center;">Page 15</p>
<p>1 may be that we're dealing in some cases with the 2 problems of yesterday and not the problems of 3 tomorrow – we are now in an Internet age, there's 4 a massive flow of information available to everyone. I 5 think it's true that in the 1930s, the BBC would have 6 its news coverage and some days it would say, "There is 7 no news to report today". Can you imagine a situation 8 in 2012 in a 24-hours news, 7-day-a-week media where 9 something like that could be said? 10 We're about to see a flood of information on to the 11 internet. We're moving from the ordinary web to the 12 semantic web, from the web of linked files to what is 13 called the web of linked data. So the amount of 14 information on the internet is going to increase 15 exponentially, the amount of information about you and 16 me, the amount of information about people is going to 17 increase exponentially. 18 There is a zero cost for publication in the 19 Internet. I can become a publisher overnight at almost 20 zero cost. There is a new citizen journalism that is 21 developing. We have all these things that are 22 happening, and that is putting pressure on the quality 23 of ordinary journalism because the advertising and 24 business model of today's newspapers, today's print 25 media, is being shot through as advertising gravitates</p> <p style="text-align: center;">Page 14</p>	<p>1 Q. And you rightly refer to clause 1 of the code which 2 directly addresses that, but how in practical terms 3 would you, if one wished to, segregate news and comment 4 so they fall into clear compartments? 5 A. We've gone into the practice, have we not, of 6 editorialising outside the ordinary editorial. We used 7 to talk about the editorial as the chance for the 8 newspaper to reflect its views. 9 Perhaps I could illustrate this best by giving you 10 an example of what happened during the period of 11 government. Perhaps it's good – you could take 12 a number of examples, but perhaps I could take one that 13 is controversial: the coverage of Afghanistan. 14 During the period I was Prime Minister, we had 15 incredibly difficult decisions to make. This is 16 a country of 35 million people, 135,000 troops at the 17 maximum. You have nothing like the coverage that you 18 have, for example, in Kosovo or East Timor, where you 19 had 1 in 50, a peace-maker for every 50 people in 20 Kosovo, and therefore you're dealing with a very complex 21 set of circumstances in a country that has never been 22 subject to effective law and order, and at a time when 23 an army of occupation is – that started as an army of 24 liberation is becoming an army of occupation, and you're 25 making very difficult and complex decisions about how</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 you deal with these problems, and so we increased the 2 number of troops from 4,900 to 9,500. We increased the 3 money spent on Afghanistan six fold, from 600 million to 4 3.5 billion. The chief of the defence staff said that 5 these were the most effective defence forces that we had 6 ever had, given the resources we were putting into them.</p> <p>7 You could have an honest debate about whether we 8 made policy mistakes. You could have, in fact, a very 9 effective debate about what was the right judgment about 10 troop numbers and everything else. We happened to have 11 the biggest troop numbers of any country apart from 12 America.</p> <p>13 But what, I think, one newspaper in particular 14 decided to do — and this is my point by way of 15 illustration — is it didn't want to take on the 16 difficult issues so it reduced their opinion that we 17 were doing something wrong to a view that was an 18 editorialising position that we simply didn't care. So 19 the whole weight of their coverage was not what we had 20 done and whether we had done the right thing; it was 21 that I personally did not care about our troops in 22 Afghanistan. And that's where you conflate fact and 23 opinion, and when you descend into sensationalism, you 24 make it not an issue about honest mistakes or matters of 25 judgment, but about evil intentions.</p> <p style="text-align: center;">Page 17</p>	<p>1 what is happening or even an honest disagreement. That 2 is the tragedy of all. The issue is reduced to: "This 3 person doesn't care."</p> <p>4 Now, that is where I find — you see, if the media 5 only had a political view and said, "We are 6 Conservative", you could accept that because that's in 7 their editorials and that's part of freedom of speech, 8 but to use the political view to then conflate fact and 9 opinion — of course that's the opposite of the press 10 rules — and at the same time to sensationalise, to 11 trivialise and in a sense to demonise, it's what 12 Professor Onora O'Neill, who I think gave the Reith 13 lectures in the early years of the century talked about 14 as a licence to deceive, and I think that is where the 15 danger arises. It's too easy, following, of course, the 16 citizen journalism of the Internet, where there is 17 unresearched items, where people put their views very 18 fiercely, where you have right wing and left wing 19 bloggers, then to sensationalise in the print media, to 20 distort fact and opinion and mix them together, and 21 then, of course, to make it an issue not of policy 22 difference but an issue of motive, an issue of 23 intentions, an issue of character, an issue of 24 personality, an issue of evil practice, and I think 25 that's where the press has failed our country and</p> <p style="text-align: center;">Page 19</p>
<p>1 So you can laugh about it now, and I do laugh about 2 it sometimes. If you pick up a newspaper and you find 3 that you've failed to bow at the cenotaph and then the 4 quote is: "That is an example of how he doesn't care 5 about our troops in Afghanistan", first of all, that 6 isn't true, and secondly that's not the conclusion that 7 should have been drawn.</p> <p>8 You have then a story before that that you fell 9 asleep during the service of remembrance, but you were 10 actually praying and you were bowing your head, and one 11 newspaper decides — and this was the Sun and I will 12 name it — this is an example of someone falling asleep 13 and dishonouring the troops and again, you don't care.</p> <p>14 You then have a letter which you send to someone on 15 which is a mark of respect to someone who is deceased 16 and you are told that you have 25 misprints and then 17 a handwriting expert appears to say this shows as lack 18 of empathy and it goes on and on and on, and that is the 19 idea.</p> <p>20 So here is a difficult issue that the press really, 21 in the interests of the British public, have to treat 22 seriously. There are very few war correspondents in 23 Afghanistan actually reporting what is happening on the 24 ground. All the reporting in these newspapers is being 25 done from Westminster, and the issue is not the facts of</p> <p style="text-align: center;">Page 18</p>	<p>1 I think on this particular issue of Afghanistan —</p> <p>2 I could give you an example from the economic crisis 3 or what was called Broken Britain, I could give you 4 examples, but this conflation of fact and opinion and 5 the way it is done is very damaging to the reputation of 6 the media and I find it done differently in other 7 countries.</p> <p>8 Q. Okay. Mr Blair's "feral beast" speech, which was on 9 12 June 2007, days before he left and you took over. 10 Did you agree with the sentiments he expressed in 11 that speech?</p> <p>12 A. I think Tony was saying exactly what I'm saying today, 13 that this issue of fact conflated with opinion — I've 14 never used these words, nor would I, and I think my 15 sentiment about the importance of the press has been 16 expressed in my earlier remarks to you, that we both 17 need a free press and should support and try to defend 18 and uphold the best of standards in a free press, but 19 I think his remarks were exactly what I'm saying, that 20 if you set out to editorialise beyond your editorial 21 column, if you conflate fact and opinion and put it on 22 the front page of your newspaper, if you then 23 sensationalise it by alleging that the opinion is not 24 about the policy that you're supposed to be discussing 25 but about the person that you are now attacking, then</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 that's not a healthy sign for a democracy.</p> <p>2 I do note on Afghanistan that — and this is what</p> <p>3 makes me very sad indeed — I'm afraid that half the</p> <p>4 country is falling into the hands of the Taliban. I'm</p> <p>5 afraid that, as we reduce troops, we're just handing</p> <p>6 over power not to the Afghan army but to the Taliban,</p> <p>7 but the very newspaper that wanted to make the issue</p> <p>8 were we doing enough for our troops, has been virtually</p> <p>9 silent since the day of the General Election in 2010,</p> <p>10 and I have to conclude, as Mr Blair concluded, that</p> <p>11 these were not campaigns that were related to objective</p> <p>12 journalism exposing the facts. These, unfortunately,</p> <p>13 were campaigns that were designed to cause discomfort to</p> <p>14 people who were politically unacceptable.</p> <p>15 Q. Okay. What's your analysis, Mr Brown, for the failure</p> <p>16 to address this issue, the fusion of fact and comment,</p> <p>17 the "feral beast" issue, put it as one wills, between</p> <p>18 1997 and 2010?</p> <p>19 A. Tony gave evidence a few days ago, and he rightly said</p> <p>20 that a decision was made that there would be no</p> <p>21 manifesto commitment to reform of the media.</p> <p>22 When I came in in 2007, we had no mandate in our</p> <p>23 manifesto to propose reform of the media. I did want to</p> <p>24 make a change, and I did try to move away from what</p> <p>25 I thought was the excessive dominance of what is called</p> <p style="text-align: center;">Page 21</p>	<p>1 it's this small group of insiders who get the benefit of</p> <p>2 early access to information, and I think that is one of</p> <p>3 the problems that prevents the greater openness that we</p> <p>4 have to see.</p> <p>5 Yes, we should have made changes a lot earlier, and</p> <p>6 yes, the changes that eventually we tried to make we</p> <p>7 didn't make successfully, I'm afraid, because there was</p> <p>8 a huge resistance to them, and to be honest, if you</p> <p>9 announce something in Parliament or announced it in</p> <p>10 a speech, it was not being reported. Unless it had been</p> <p>11 given as an exclusive to a newspaper, they tended to put</p> <p>12 it on page 6, rather than page 1.</p> <p>13 Q. Wasn't part of the reason for the inaction simply this,</p> <p>14 that until September 2009, your government had the</p> <p>15 support of the Sun, or certainly didn't expressly not</p> <p>16 have the support of the Sun and therefore the political</p> <p>17 will did not exist to take on the feral beasts?</p> <p>18 A. I think that's a completely wrong impression about what</p> <p>19 was happening. I don't see us having the support the</p> <p>20 Sun for almost all the time that I was Prime Minister.</p> <p>21 You have to remember that when I started off as</p> <p>22 Prime Minister, the first thing the Sun did was try to</p> <p>23 ruin my first party conference but launching their huge</p> <p>24 campaign about how we were selling Britain down the</p> <p>25 river and demanding not only a European referendum but</p> <p style="text-align: center;">Page 23</p>
<p>1 the lobby system, and what really has led to these</p> <p>2 allegations of spin — by the way, spin assumes that you</p> <p>3 got success in getting your message across, even if it's</p> <p>4 superficial and I don't think anybody could accuse me of</p> <p>5 having a great success in getting my message across.</p> <p>6 But I tried to move away from that.</p> <p>7 One, we moved from having a political chief of</p> <p>8 communications to having a civil servant doing the job.</p> <p>9 That was to send the message that we were not trying to</p> <p>10 politicise government information; we were trying to</p> <p>11 give the information that was necessary for the public</p> <p>12 to understand what was happening.</p> <p>13 We then tried to move back to a system where</p> <p>14 announcements were made in Parliament. They were not</p> <p>15 pre-briefed, they were made in Parliament, and therefore</p> <p>16 that moved away from a system where, to be honest, there</p> <p>17 were a selected group of people who previously could</p> <p>18 expect to get early access to information, and I think</p> <p>19 that's been a problem with the way the media system has</p> <p>20 worked, but I'm afraid it was wholly unsuccessful, and</p> <p>21 I see that the current government have moved back to</p> <p>22 having a political appointee as — originally, of</p> <p>23 course, Mr Coulson as the head of the communications</p> <p>24 operation, and the lobby system remains intact.</p> <p>25 It's not the lobby system per se that's the problem,</p> <p style="text-align: center;">Page 22</p>	<p>1 demanding that I support it. Then they ran, I think,</p> <p>2 a huge campaign on Broken Britain, which was taken up by</p> <p>3 the Conservative Party but was simply an attack on the</p> <p>4 government. So at no point in these three years that</p> <p>5 I was Prime Minister did I ever feel I had the support</p> <p>6 of the Sun.</p> <p>7 I think what really changed, however, and I have to</p> <p>8 be honest about this, is when News International decided</p> <p>9 that their commercial interests came first, and I have</p> <p>10 to be absolutely clear about that, and I've submitted</p> <p>11 a note to you about that. There was a point in 2008 and</p> <p>12 2009 where, particularly with James Murdoch's speech in</p> <p>13 Edinburgh at the MacTaggart lecture when he set out an</p> <p>14 agenda, which to me was quite breathtaking in its</p> <p>15 arrogance and its ambition, and that was to neuter the</p> <p>16 BBC, it was to undermine Ofcom, the regulator, and it</p> <p>17 was a whole series of policy aims, which I've itemised</p> <p>18 for you in evidence I've given you, which no government</p> <p>19 that I was involved in could ever agree to. So the BBC</p> <p>20 licence fee was to be cut, they were to be taken out of</p> <p>21 much of the work on the Internet, their commercial</p> <p>22 activities were to be reduced, Ofcom was to be neutered,</p> <p>23 the listing of sporting occasions was to be benefited</p> <p>24 News International, product placement was to be allowed.</p> <p>25 A whole series of issues. The impartiality of news</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 coverage should be removed as a requirement on the need, 2 and it should be like Fox News and not Sky News.</p> <p>3 The remarkable thing about this period in 4 government -- and I say this with regret, and I say this 5 with a great deal of sadness -- is that we could not go 6 along with that sort of agenda. We could not go along 7 with the neutering of Ofcom or the BBC seeing its 8 licence fee cut in real terms -- as I think has happened 9 now by something in the order of 15 per cent by 2016, 10 plus a whole series of other responsibilities put on 11 them -- nor could we see a case for the BBC being taken 12 out of much of its work on the Internet because that's 13 a valuable media service for the future, but while we 14 resisted that and were not supported, on each and every 15 one of these issues, I'm afraid to say -- and I think 16 this is an issue of public policy -- the Conservative 17 Party supported every one of the recommendations that 18 were made by the Murdoch group.</p> <p>19 Q. There's possibly the slight danger there, Mr Brown, of 20 straying away from the ambit of the question.</p> <p>21 A. I want to make the point, Mr Jay, if I may --</p> <p>22 Q. I was going to come to?</p> <p>23 A. -- it was suggested that somehow relations with the Sun 24 newspaper or with Mr Murdoch broke down because he 25 decided that he wanted to support the Conservative</p> <p style="text-align: right;">Page 25</p>	<p>1 I don't want to cause you or your family any distress 2 unnecessarily, but I hope you will see the value of the 3 example, in the same way as I apologised to those who 4 complained about press intrusion last November when they 5 gave evidence, because I do think it's an important part 6 of the story.</p> <p>7 A. I'm very grateful to you, Lord Justice Leveson. I have 8 never sought to bring my children into the public 9 domain, but I do think if we don't learn the lessons 10 from this, we'll continue to make mistakes.</p> <p>11 In 2006, the Sun claimed that they had a story from 12 a man in the street who happened to be the father of 13 someone who suffered from cystic fibrosis. I never 14 believed that could be correct. At best, he could only 15 have been the middleman, because there were only a few 16 people, medical people, who knew that our son had this 17 condition.</p> <p>18 In fact, for the first three months that our son was 19 alive, I just have to say to you, we didn't know, 20 because there were tests being done all the time to 21 decide whether this was indeed his condition or not, and 22 only by that time, just before the Sun appeared with 23 this information, had the medical experts told us that 24 there was no other diagnosis that they could give than 25 that this was the case. So only a few people knew this.</p> <p style="text-align: right;">Page 27</p>
<p>1 Party. I want to suggest to you that the commercial 2 interests of News International were very clear long 3 before that and they had support from the Conservative 4 Party.</p> <p>5 Q. May I move off the general comments now, Mr Brown, onto 6 your own experience, which is page 14214, or page 8 on 7 the internal numbering of your statement. Can I go back 8 to 2006 and the story in relation to your younger son in 9 the Sun newspaper.</p> <p>10 May we start off, please, by establishing the facts 11 as you know them to be in relation to this story. In 12 particular, do you know the Sun newspaper's source for 13 that story?</p> <p>14 A. This is very difficult for me, if I may say so, because 15 I've never chosen and never wanted my son or my sons and 16 my daughter ever to have been across the media. I do 17 think there is an issue -- and I hope that you will 18 address this -- about the rights of children to be free 19 from unfair coverage in media publications. But because 20 this issue was raised and became an issue for me, I've 21 had to look at what actually happened at the time and 22 it's only, in a sense, latterly that the facts that 23 I think are necessary to a fair examination of this have 24 become available.</p> <p>25 LORD JUSTICE LEVESON: Mr Brown, let me make it clear,</p> <p style="text-align: right;">Page 26</p>	<p>1 I have submitted to you a letter from Fife Health 2 Board which makes -- the National Health Service in 3 Fife, that is -- which makes it clear that they have 4 apologised to us because they now believe it highly 5 likely that there was unauthorised information given by 6 a medical or working member of the NHS staff that 7 allowed the Sun, in the end, through this middleman, to 8 publish this story.</p> <p>9 Now, whether medical information should ever be 10 hounded out without the authorisation of a parent or of 11 a doctor through the willingness of a parent is one 12 issue that I think it addressed, and I know the Press 13 Complaints Commission code is very clear, that there are 14 only exceptional circumstances in which a child's -- or 15 information about a child should be broadcast, and 16 I don't believe that this was one of them.</p> <p>17 I find it sad that even now, in 2012, members of the 18 News International staff are coming to this Inquiry and 19 maintaining this fiction that a story that could only 20 have been achieved or obtained through medical 21 information or through me or my wife leaking it -- which 22 we never did, of course -- was obtained in another way. 23 I think we cannot learn the lessons of what has happened 24 with the media unless there is some honesty about what 25 actually happened and whether payment was made and</p> <p style="text-align: right;">Page 28</p>

7 (Pages 25 to 28)



<p>1 whether this is a practice that could continue, and if</p> <p>2 we don't root out this kind of practice, I don't think</p> <p>3 that we can sensibly say that we've dealt with some of</p> <p>4 the abuses that are problematical for us.</p> <p>5 I would say this about any child. I don't think any</p> <p>6 child's medical information, particularly at four</p> <p>7 months, has any interest for the public and should be</p> <p>8 broadcast to the public.</p> <p>9 MR JAY: Could you tell us, please, Mr Brown, the</p> <p>10 circumstances in which you or your wife were told that</p> <p>11 the Sun had this story and were minded to print it?</p> <p>12 A. I think again, if I can be very specific about this,</p> <p>13 because it is something that I believe you've been given</p> <p>14 information in this Inquiry that is not strictly</p> <p>15 correct. Our press office was phoned by a journalist</p> <p>16 from the Sun and said that they had this story about our</p> <p>17 son's condition and they were going to publish it.</p> <p>18 I was then contacted. I was engaged in the pre-budget</p> <p>19 report. I immediately, of course, phoned my wife,</p> <p>20 Sarah, and we had to make a decision. If this was going</p> <p>21 to be published, what should happen? We wanted to</p> <p>22 minimise the damage, to limit the impact of this, and</p> <p>23 therefore we said that if this story was to be</p> <p>24 published, then we wanted a statement that went to</p> <p>25 everyone that was an end to this, and there would be no</p> <p style="text-align: center;">Page 29</p>	<p>1 choice that we are told we made, to give explicit</p> <p>2 permission for that to happen.</p> <p>3 So there was no question ever of explicit</p> <p>4 permission, and I think if my son were to read, at</p> <p>5 a later stage, on the Internet that his mother or I had</p> <p>6 given permission that all his medical information or</p> <p>7 medical knowledge should be broadcast in a newspaper, he</p> <p>8 would be shocked at our failure as parents. So I just</p> <p>9 cannot accept, as a parent, that we would ever put</p> <p>10 ourselves in a position where we gave explicit</p> <p>11 permission for medical knowledge about our son to be</p> <p>12 broadcast to the press.</p> <p>13 We had, I'm afraid, had previous experience of this</p> <p>14 when our daughter died, and we were very aware that this</p> <p>15 was a problem, but when you're presented with a fait</p> <p>16 accompli, there's nothing you can do other than to try</p> <p>17 to limit and minimise the damage.</p> <p>18 I may say we had not told relatives about this.</p> <p>19 This is a hereditary condition and therefore there were</p> <p>20 some relatives who actually were directly affected by it</p> <p>21 and we had to tell them. So there was no question of us</p> <p>22 being willing or complicit or anxious or, as one of your</p> <p>23 core participants has said this morning, desiring that</p> <p>24 this information be made public. No question about that</p> <p>25 at all. You could never imagine a situation.</p> <p style="text-align: center;">Page 31</p>
<p>1 further statements, no days and days and days of talking</p> <p>2 about the condition of our son.</p> <p>3 Unfortunately, this was unacceptable to the Sun</p> <p>4 newspaper. The editor phoned our press office and said</p> <p>5 that this was not the way that we should go about this,</p> <p>6 and to be honest, if we continued to insist that we were</p> <p>7 going to make a general statement, the Sun wouldn't, in</p> <p>8 future, give us any chance of advance information on any</p> <p>9 other story that they would do.</p> <p>10 It was at that time that the editor of the Sun</p> <p>11 phoned my wife, whose aim then, having accepted that</p> <p>12 this was a fait accompli — there was no thought that</p> <p>13 the Press Complaints Commission could help us on this.</p> <p>14 I think we were in a different world then. Nobody ever</p> <p>15 expected that the Press Complaints Commission would act</p> <p>16 to give us any help on this, and we were presented with</p> <p>17 a fait accompli, I'm afraid. There was no question of</p> <p>18 us giving permission for this. There was no question of</p> <p>19 implicit or explicit permission.</p> <p>20 I ask you: if any mother or any father was presented</p> <p>21 with a choice as to whether a four-month old son's</p> <p>22 medical condition, your child's medical condition,</p> <p>23 should be broadcast on the front page of a tabloid</p> <p>24 newspaper and you had a choice in this matter — I don't</p> <p>25 think there's any parent in the land would have made the</p> <p style="text-align: center;">Page 30</p>	<p>1 If people are able to say, in the aftermath of</p> <p>2 something like this, that they've had explicit</p> <p>3 permission when they haven't, and they can claim</p> <p>4 ex post facto that permission was given when there's no</p> <p>5 evidence that there was, then this practice will go on</p> <p>6 and on and on and children's information and information</p> <p>7 about people will go into the public arena with this</p> <p>8 idea that you can claim afterwards that you had explicit</p> <p>9 permission for something you never had permission for.</p> <p>10 I think this is important because we have to learn</p> <p>11 lessons from this, and I think there are more general</p> <p>12 lessons to be learned, but surely the rights of children</p> <p>13 must come first.</p> <p>14 Q. Thank you, Mr Brown. Another core participant has</p> <p>15 required me to put some questions to you, of which</p> <p>16 I know you have advance notice. I might just run</p> <p>17 through them.</p> <p>18 Mrs Brooks has stated on oath that the Sun had</p> <p>19 consent from your wife to run the story in November</p> <p>20 2006. Do you deny that consent was given?</p> <p>21 A. Absolutely. My wife has issued a statement to that</p> <p>22 effect.</p> <p>23 Q. If no consent was given, you and your wife must have</p> <p>24 been extremely upset and angry. If so, why was no</p> <p>25 complaint made by either yourself or your wife</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 until June 2011?</p> <p>2 A. That's not correct at all. Again, I think the</p> <p>3 trivialisation of this is really unfortunate.</p> <p>4 When we found out that this had happened — and we</p> <p>5 had had our previous experience, when information,</p> <p>6 medical information about our daughter, had been made</p> <p>7 public before she died — we thought the only way to</p> <p>8 deal with this was to get the Press Complaints</p> <p>9 Commission in this case, but through the editors of the</p> <p>10 major newspapers, to reach an agreement that they would</p> <p>11 not publish information or photograph our children.</p> <p>12 Before I became Prime Minister, I set in motion, and</p> <p>13 Sarah and I set in motion, this procedure that we would</p> <p>14 ask the editors of all the newspapers. We felt this was</p> <p>15 a structural problem. It wasn't simply a problem</p> <p>16 associated with only one newspaper. We wanted them to</p> <p>17 agree that our children would not be covered while they</p> <p>18 were at nursery school and primary school. They're very</p> <p>19 young, as you may know.</p> <p>20 We didn't want our children to grow up thinking that</p> <p>21 they were somehow minor celebrities. We'd seen the</p> <p>22 effect of this in other countries. We wanted our</p> <p>23 children to grow up just as ordinary young kids that</p> <p>24 went to school with everybody else and were treated just</p> <p>25 like everybody else. So it was important to us that we</p> <p style="text-align: center;">Page 33</p>	<p>1 in the White Ribbon Alliance and in the campaign to cut</p> <p>2 maternal deaths, the maternal mortality campaign, which</p> <p>3 was incredibly successful in cutting maternal mortality</p> <p>4 by 30 per cent. And it was Wendi Murdoch — and I think</p> <p>5 it was her 40th birthday as well — and Sarah that had</p> <p>6 campaigned together on this maternal mortality campaign.</p> <p>7 So my wife's charity work is something that she was</p> <p>8 engaged in quite separately from my political work. As</p> <p>9 far as I was concerned, I couldn't allow what had</p> <p>10 happened to me to become a huge issue when I had a job</p> <p>11 to do.</p> <p>12 Q. Are you aware that your wife wrote Mrs Brooks a number</p> <p>13 of personal notes and letters between 2006 and 2010 in</p> <p>14 which she expressed her gratitude for "the support given</p> <p>15 to us"?</p> <p>16 A. Well, I think my wife, as I said, is a person who is</p> <p>17 forgiving and would be kind to people irrespective of</p> <p>18 what had happened in this particular incident, and</p> <p>19 I don't think that that is evidence that we gave</p> <p>20 explicit permission for a story to appear in the Sun.</p> <p>21 Q. The last question, if I can turn to you: the records</p> <p>22 show that there are 13 meetings between you or your wife</p> <p>23 after Mrs Brooks had caused the article to be published</p> <p>24 in November 2006. Why did you have those meetings?</p> <p>25 A. Well, I'm not sure that there were 30, but I think that</p> <p style="text-align: center;">Page 35</p>
<p>1 had this agreement with the press, but that is how we</p> <p>2 went about changing the way things had been done, and to</p> <p>3 be fair to the media — and I say this in my written</p> <p>4 evidence, that we did have only two incidents where this</p> <p>5 was breached. So it was possible, after this, to hold</p> <p>6 a voluntary agreement, but the idea that we did nothing</p> <p>7 after this incident is quite wrong, and I'm afraid it's</p> <p>8 offensive. We took action to deal with it in the best</p> <p>9 way we could without any fuss and without any noise, but</p> <p>10 to get an agreement that children would not be covered</p> <p>11 in this way, and I hope it is of help to others in</p> <p>12 similar positions.</p> <p>13 Q. Thank you. Why did your wife in particular remain good</p> <p>14 friends with Mrs Brooks, to the extent of arranging</p> <p>15 a 40th birthday party at Chequers for her in June 2008,</p> <p>16 attending her birthday party in 2008 and Mrs Brooks'</p> <p>17 wedding in June 2009, if what you say is correct?</p> <p>18 A. I think Sarah is one of the most forgiving people</p> <p>19 I know, and I think she finds the good in everyone.</p> <p>20 Look, we had to accept that this had happened, and</p> <p>21 we had to get on with the job of doing what people</p> <p>22 expected a politician to do, to run a government. My</p> <p>23 wife had a massive amount of charity work that she was</p> <p>24 engaged in, and in fact, if I'm being accurate, I think</p> <p>25 it was Wendi Murdoch, Mrs Murdoch's wife, who joined her</p> <p style="text-align: center;">Page 34</p>	<p>1 we had regular meetings — what is the role of</p> <p>2 a politician, particularly someone who is</p> <p>3 a prime minister? You have a duty to explain. You have</p> <p>4 to engage with the media. They are a medium by which</p> <p>5 the concerns of the nation are expressed. We were</p> <p>6 a country at war in Afghanistan, and before that, in</p> <p>7 Iraq, at the time I was Prime Minister. We were</p> <p>8 a country that faced a grave economic crisis. I would</p> <p>9 have been failing in my duty if I had not tried — and</p> <p>10 I've listed all the meetings with the Telegraph, with</p> <p>11 the Mail. They're hardly Labour supporters, are they,</p> <p>12 and hardly people that actually did a huge amount to</p> <p>13 promote my premiership? I met them all to try to</p> <p>14 explain because I believed I had a duty to try to build</p> <p>15 a consensus in this country about how we approached what</p> <p>16 was the most difficult problem that took, after the</p> <p>17 global economic crisis, most of my time, Afghanistan,</p> <p>18 and how we approached the economic crisis.</p> <p>19 I think people would be criticising me if I had</p> <p>20 failed to talk to the media and failed to engage with</p> <p>21 them, but I may say to you: there was a red line in</p> <p>22 everything I ever did, and there was a line in the sand</p> <p>23 across which I could never cross. If there was any</p> <p>24 question that a vested interest was trying to promote</p> <p>25 something that was against the public interest, then</p> <p style="text-align: center;">Page 36</p>

9 (Pages 33 to 36)

<p>1 I could have nothing to do with that, and I think you 2 can serve up dinner but you don't need to serve up BSkyB 3 as part of the dinner. You have to have a clear 4 dividing line between what you do in politics, and for 5 me there was never a point -- we had issues related to 6 the takeover or attempted takeover of ITV. We had -- 7 News International were very annoyed about what was 8 happening in Ofcom to sporting rights. We had other 9 news media concerned about different things. The BBC, 10 of course, was concerned about the licence fee.</p> <p>11 But at no point in my premiership would I ever allow 12 a commercial interest to override the public interest, 13 and I've looked at all the records of what happened, 14 including the records of our ministers in this matter, 15 and we would never allow the public interest to be 16 subjugated to the commercial or vested interests of any 17 one company.</p> <p>18 Q. Did you sense, though, in your dealings with 19 News International, that they were trying to persuade 20 you to pursue media policies which were favourable to 21 their interests but contrary to the public interest?</p> <p>22 A. News International had a public agenda. What's 23 remarkable about what happened in the period of 2009 and 24 2010 is that News International moved from being -- 25 I think it was under James Murdoch's influence, not so</p> <p style="text-align: center;">Page 37</p>	<p>1 perceived her to be a powerful women and it would have 2 been against your interest to have taken her on?</p> <p>3 A. I don't think I had a conversation with Mrs Brooks in 4 the last -- I think I had one conversation in the last 5 nine months of our government.</p> <p>6 It became very clear in the summer of 2009, when 7 Mr Murdoch junior gave the MacTaggart lecture, that 8 News International had a highly politicised agenda for 9 changes that were in the media policy of this country, 10 and there seemed to me very little point in talking to 11 them about this.</p> <p>12 Q. Okay. Page 9 of your statement -- we're just going to 13 note this, Mr Brown. This is our page 14215. You 14 identify a number of breaches of your privacy, whether 15 assaults, as it were, on your build society account, the 16 national police computer was entered to check your name 17 on police files, blagging, et cetera. We've heard 18 evidence in relation to a lot of that already, but you 19 formally draw this to our attention.</p> <p>20 A. Yes. Let me say, politicians must expect scrutiny. 21 I have no doubt that the level of scrutiny that is going 22 to happen in a modern technology age is going to be 23 very, very great indeed.</p> <p>24 I think the question is whether you can justify what 25 you might call fishing expeditions, based on nothing</p> <p style="text-align: center;">Page 39</p>
<p>1 much Rupert Murdoch's influence, if I may say so -- to 2 having an aggressive public agenda. They wanted not 3 just to buy BSkyB, of course; they wanted to change the 4 whole nature of the BBC. They wanted to change Ofcom, 5 they wanted to change the media impartiality rules, they 6 wanted to change the way we dealt with advertising so 7 that there was more rights for the media company to gain 8 advertisers. They wanted to open up sporting events so 9 that Sky could bid for them in a way that -- they were 10 perfectly entitled to put this agenda. That was the 11 agenda they were putting publicly. I think what became 12 a problem for us was that on every one of these single 13 issues, the Conservative Party went along with the 14 policy, whereas we were trying to defend what I believe 15 was the public interest.</p> <p>16 Q. So is this the gist of your evidence: that the agenda 17 they pursued was done publicly but not privately?</p> <p>18 A. I think their agenda was very public, and I don't think 19 that they should be criticised for having a view about 20 events. I think, however, it is the duty of the 21 political system to distinguish between what's a vested 22 interest and what's a public interest. I did so, and 23 I think we did so at a cost.</p> <p>24 Q. Was not part of your reason, Mr Brown, for continuing to 25 have dealings with Mrs Brooks that you correctly</p> <p style="text-align: center;">Page 38</p>	<p>1 other than a political desire to embarrass someone, and 2 I think the evidence that I give you is in relation to 3 fishing expeditions where newspapers --</p> <p>4 Look, if you take everything that is personal about 5 your life -- your bank or building society account, your 6 medical records, your tax affairs, your lawyer and what 7 he -- his legal records, your accountant -- in every 8 area during the period that I was chancellor, there was 9 either a break-in or a breach of these records. In most 10 cases, I can show now that that happened because of an 11 intrusion by the media.</p> <p>12 Now, I have been the first to say that there is 13 a public interest defence if people are looking for 14 information where they feel that there's a crime being 15 committed and that the police or someone else is not 16 investigating it, or where there's a security issue that 17 is vital to the safety of the country and it's not being 18 properly looked into, or, as the Press Complaints 19 Commission rules themselves say, where there is an 20 individual who is lying and who is deceiving. But 21 I look at these instances, and I give you one as an 22 example. I just give it to you. I was accused of 23 buying a flat in an under-the-counter sale by 24 a Sunday Times Insight team. They suggested that I'd 25 bought this flat and it hadn't appeared on the open</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 market and I got it at a knock-down price, and they 2 would not accept that – the starting point of any 3 investigation was something that they would not 4 acknowledge, that this very flat that I was supposed to 5 have bought in an under-the-counter sale had first of 6 all been advertised in the Sunday Times itself.</p> <p>7 We had impersonating me to get bank information, we 8 had blagging by lawyers, we had what's called reverse 9 engineering of telephone. Someone sent me a tape which 10 I passed on to the police, where the Sunday Times 11 Insight team reporters are talking about how they're 12 going to use these – what I think are underhanded, 13 perhaps unlawful techniques and tactics. But there was 14 no public justification for this because there was no 15 wrongdoing, and even now, I'm afraid the editor of the 16 Sunday Times has come to your Inquiry and said that he 17 had evidence of something that he was never able to 18 prove and there was no public interest justification for 19 the intrusion and the impersonation and the breaking 20 into the records.</p> <p>21 I accept a huge amount has to be tolerated in the 22 interests of a politics that is free of corruption, but 23 I don't think a newspaper, when it resorts to these 24 tactics and then finds that there's nothing to report, 25 should hold to a story which they know patently to be</p> <p style="text-align: center;">Page 41</p>	<p>1 limited, with the Guardian. Mr Harding of the Times. 2 One meeting with Mr Hinton, one with the Lebedevs. 3 It's a full range, really. Would you agree? 4 A. Yes. I tried my best to meet everyone. I think 5 probably – yes, I met everyone where I could, and I did 6 it sometimes at events that they had organised, 7 sometimes at events that we organised, but I did it as 8 regularly as I could. Not, I may say, with a great deal 9 of success.</p> <p>10 Q. In relation to the Murdochs, on the internal numbering 11 of this document on the top right, page 12, we see that 12 there are only two relevant meetings with 13 Mr James Murdoch. The last was on 19 January 2009. Do 14 you see that? And then there's a list of your meetings 15 with Mr Rupert Murdoch.</p> <p>16 You've put in a revised schedule quite recently, 17 which --</p> <p>18 A. I did so, if I may say so, because the Cabinet Office 19 gave me the information, and I gave you what information 20 they'd given me originally and I now give you the 21 information they've given me subsequently. So that -- 22 if there has been --</p> <p>23 Q. We will publish the revised schedule. It removes the 24 meeting of 5 October 2007 which you say didn't take 25 place.</p> <p style="text-align: center;">Page 43</p>
<p>1 absolutely wrong. If you can laugh at it now, that they 2 were claiming something that actually was advertised in 3 their own paper was not correct, we have lessons to 4 learn from that.</p> <p>5 It's about freedom being exercised with 6 responsibility and where irresponsibility is the way 7 that freedom is exercised, it casts a doubt on the 8 motives of the media.</p> <p>9 Q. May we look now at your exhibit GB3, which is a list of 10 your meetings with the media between 2007 and 2010. 11 It's under tab 5 of the bundle we've prepared. Just so 12 we get the flavour of this.</p> <p>13 A. It's – it was a duty of office, if I may say so. If 14 I had not met media owners and editors, I would be 15 failing in my duty. We had to explain to them what was 16 basically two huge national issues, and the reason that 17 calls are greater in some parts than others is because 18 Afghanistan and the economic crisis were bigger issues 19 at the time.</p> <p>20 Q. We can see the range of people you were seeing, 21 Mr Brown. The Barclays at the Telegraph on the first 22 page, Mr Paul Dacre on the second page. Quite a few 23 interactions with him, mainly over breakfast. We'll be 24 coming back to that. Mr Dan Cone(?) of the Telegraph, 25 the editor of the Telegraph, them some meetings, quite</p> <p style="text-align: center;">Page 42</p>	<p>1 According to exhibit KRM 27, the exhibits to 2 Mr Rupert Murdoch's witness statement, there was 3 a meeting on 6 October. I thought there was also 4 a phone call on 4 October, but that may not be right. 5 No, his meetings start on 6 October so there's nothing 6 for 4 October.</p> <p>7 If we can deal with one point which was floated in 8 evidence. This relates to the snap election, if you 9 recall that, in 2007. An interview was pre-recorded by 10 Andrew Marr with you on Saturday, 6 October. We know 11 that there was dinner at Chequers with Mr Murdoch and 12 his wife and others on the evening of 6 October 2007.</p> <p>13 A. That's right. I think there was a misunderstanding, 14 that people thought that I'd met Mr Murdoch and then 15 done an interview with Mr Marr, and that somehow that 16 would have influenced what I said to Mr Marr. In fact, 17 I did the interview with Mr Marr and was very careful to 18 do it before I had any meetings. I spoke to Mr Marr, 19 did the interview, it was recorded the day before, so 20 when I went for dinner with Mr Murdoch later on, I'd 21 already recorded everything I was going to say about 22 these issues and he had no influence on that interview 23 or any decision I made, and he wasn't consulted about 24 it, nor should he have been, nor, to be fair to him, 25 would he have expected to have been.</p> <p style="text-align: center;">Page 44</p>

11 (Pages 41 to 44)

<p>1 Q. I think there's also a correction of the dinner with 2 President Bush was 15 June, not 15 August 2008. There 3 are a couple of other meetings which you've added to 4 your schedule but I don't think much turns on those. 5 We'll publish the revised schedule in due course, 6 Mr Brown.</p> <p>7 A. Okay.</p> <p>8 Q. There's also a list of phone calls at GB3B, which we'll 9 come to in a short moment.</p> <p>10 In relation to Mr Rupert Murdoch, Lord Mandelson has 11 told us that relations were closer than was wise, and he 12 included you within that statement. Do you agree with 13 him?</p> <p>14 A. No, I don't, actually, and I'm sorry, because I think 15 Mr Mandelson is perceptive about events normally.</p> <p>16 I think -- I obviously came from a Scottish 17 Presbyterian background. Mr Murdoch himself was the 18 grandson of a Scottish Presbyterian minister. I always 19 found it interesting that his grandfather had gone out 20 to Australia and immediately been put into prison 21 because he had defended church against state, so the 22 same Presbyterian interest in the freedom of conscience 23 and the, if you like, speaking truth to power was 24 I think very much part of what Rupert Murdoch's view of 25 the media was.</p> <p style="text-align: center;">Page 45</p>	<p>1 But I think you have to distinguish again between 2 the views that you have about him as an individual and 3 the red line that I would draw, the line in the sand 4 I talked about, between that and any support for 5 commercial interests.</p> <p>6 Q. But Lord Mandelson, when stating that relations were 7 closer than was wise, also made it clear that neither 8 Mr Blair nor you crossed that line, so I think his point 9 was more about perception than the reality. On that 10 basis, do you accept his observation?</p> <p>11 A. No, because the implication is that I would be 12 influenced by what Mr Murdoch was saying about these big 13 issues. I mean, I thought that it was wrong to join the 14 euro and I think we'll come back to that when you talk 15 about some of the issues relating to the media later, 16 but I didn't agree with him on most of these other 17 issues, and the idea that Mr Murdoch and I had a common 18 bond in policy is, I'm afraid, not correct. Mr Murdoch 19 was probably more on the flat tax school of policy than 20 in the school of policy that was identified with what we 21 were doing.</p> <p>22 But I don't detract from the respect that I think he 23 deserves for having built up a very strong media empire, 24 starting from a view about the importance of a free 25 media.</p> <p style="text-align: center;">Page 47</p>
<p>1 So I understood, I think, quite a lot about his 2 Scottish background, but the idea that I was influenced 3 in what I did by Mr Rupert Murdoch's views is faintly 4 ridiculous, because Mr Murdoch would have, if he had had 5 the chance, persuaded us to leave the European Union, 6 not just stay out of the euro. He probably would have 7 had us at war with France and Germany. He probably 8 would have had us as a 51st state of America, and 9 Scotland, of course, which he wants to be independent, 10 he would have had as the 52nd state, with probably 11 a Republic in Scotland.</p> <p>12 So the idea that I went along with Mr Murdoch's 13 views is quite ridiculous. Mr Murdoch has very strong 14 views. He's entitled these views. The idea that I was 15 following his views is just absolutely nonsense.</p> <p>16 Q. Mr Murdoch himself describes a warm relationship he had 17 with you. Is that a fair characterisation?</p> <p>18 A. Yeah, I think the similar background made it interesting 19 because I think I understood where many of his views 20 came from, and I do also think he's been, as I said, 21 I think, publicly, a very successful businessman, and 22 his ability to build up a newspaper and media empire, 23 not just in Australia but in two other continents, in 24 America and Europe, is something that is not going to be 25 surpassed easily by any other individual.</p> <p style="text-align: center;">Page 46</p>	<p>1 Q. Between 1997 and 2007, were relations closer than was 2 wise?</p> <p>3 A. No, I don't think so. I rarely met Mr Murdoch, to be 4 absolutely truthful. I don't think he was in the 5 slightest bit interested in what I was doing --</p> <p>6 Q. Yes.</p> <p>7 A. -- and I can't remember many meetings with him at all. 8 I don't know if you have a record of these meetings but 9 I think you'll find them few and partner between.</p> <p>10 Q. Speaking more generally of the government of which you 11 were part, do you think that government was too close 12 than was wise to Mr Murdoch?</p> <p>13 A. I don't think so, but I don't know all the details of 14 what was discussed at the time. I had very few dealings 15 with Mr Murdoch and not many dealings with 16 News International. They had their own views on issues 17 of policy, and they weren't, in many ways, similar to 18 mine.</p> <p>19 Q. But weren't you aware of policy from the very top, as it 20 were, courting, assuaging and persuading the media, 21 including, in particular, News International. Was that 22 something (a) that you were aware of and (b) that you 23 assented to?</p> <p>24 A. My efforts were to persuade every media group that what 25 we were doing was serious. Look, we were trying to</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 rebuild the National Health Service, improve our 2 education system, get more police onto the street, 3 legislate for freedom of information. We had agendas on 4 civil liberties, on issues like gay partnerships. All 5 these issues, you needed to have an understanding, at 6 least, on the part of the media, and you needed to talk 7 to them.</p> <p>8 As for any particular media group, I don't think 9 that I was involved in any sort of way that I would feel 10 uncomfortable about now with any particular media group 11 at all.</p> <p>12 Q. You must have been aware, though, of the pieces in the 13 Sun newspaper in March and April 1997 which we're told 14 adopted a rhetorical position but not one of substance. 15 Didn't those pieces cause you any qualms or distaste at 16 the time?</p> <p>17 A. Are you talking about the articles about the euro or 18 about Europe?</p> <p>19 Q. Yes.</p> <p>20 A. It's a strange coincidence that I, while supporting the 21 idea of a single currency in principle, was always 22 doubtful and dubious about its benefits to Britain in 23 practice, so I have found it of no great difficulty to 24 me that people were questioning the euro.</p> <p>25 I think this goes to the heart of what happened</p> <p style="text-align: center;">Page 49</p>	<p>1 exclusivity for some people within the lobby that people 2 rightly, I think, resent.</p> <p>3 But when we tried to change it after 2007, we found 4 it example impossible to do so, and this openness of 5 culture that we should have really encouraged earlier is 6 something that I think still eludes us.</p> <p>7 Q. In 1997, did you believe that the support of the Sun 8 newspaper was important or not?</p> <p>9 A. Well, I wasn't involved in that particular issue.</p> <p>10 I wasn't involved in talks about that, but clearly, if 11 you'd been in opposition for what has been 18 years, and 12 a newspaper that has previously been Conservative comes 13 to you or is prepared to come to you, that is a bonus, 14 that is something that you would welcome. But it's not 15 the be all and end all, and it's not something that 16 dictates the future of politics in your country, but 17 it's an important element of building a coalition for 18 success.</p> <p>19 Q. Going forward 12 years to 2009 --</p> <p>20 A. Yes.</p> <p>21 Q. -- were you not concerned at the runes, as it were, the 22 signs of the Sun moving away from you to support the 23 Tory Party?</p> <p>24 A. I think that had happened from the time I became 25 Prime Minister. I'll be honest. I think they had</p> <p style="text-align: center;">Page 51</p>
<p>1 during a period of 13 years of government, that the euro 2 was a huge, huge issue, because some people argued that 3 if Britain did not join the euro then its future was 4 always to be on the periphery of Europe, and that was an 5 issue that had to be taken seriously.</p> <p>6 I, however, argued that the economics of the euro 7 made it almost impossible that Britain could benefit 8 from joining, and we did a whole series of studies in 9 detail showing that in fact it may not be of great 10 benefit to Europe to have the euro.</p> <p>11 Q. Even looking back on this period -- I'm looking now at 12 the period 1997 to 2007 -- do you think that there are 13 any lessons to be learnt from the relationship the 14 Labour government, of which you were a part, fostered 15 with the media, in particular News International?</p> <p>16 A. Definitely. I hope I'm not misunderstood, because my 17 original point was this: that we accepted too easily 18 a closed culture where it was possible for stories about 19 political events to be told to a few people rather than 20 openly by Parliamentary announcement or by speech, and 21 we should have reformed that system earlier, and the 22 system, I'm afraid, is still waiting to be reformed 23 announcement. It is too closed a system. It relies on 24 too small a number of people. Of course, it has its 25 heart in the lobby system, but it is actually the</p> <p style="text-align: center;">Page 50</p>	<p>1 severe reservations that were expressed in the European 2 campaign, the Broken Britain campaign, their Afghanistan 3 campaign, and I think, as I said, also there was a new 4 agenda that Mr James Murdoch was promoting about the 5 future of the media policy in Britain. So I was not 6 surprised at all when the Sun -- I perhaps was surprised 7 about the way they did it, which was a strange thing to 8 do, but the act of deciding to go with the 9 Conservatives, I think, had been planned over many, many 10 months.</p> <p>11 Q. But Lord Mandelson's account in his book was that the 12 shift of support stung you, to use his words, and in the 13 weeks and months that followed, it grated on you more 14 and more. Is that an accurate observation or not?</p> <p>15 A. No, I don't think so, because I had accepted that -- 16 I never complained to the Sun about us losing their 17 support. I never phoned them up. I have never asked 18 a newspaper for their support directly and I've never 19 complained when they haven't given us their support. 20 I don't think that you should be dependent on people by 21 begging them to support you in this way, and perhaps 22 it's a failing on my part that I never asked them 23 directly, but I never asked them directly, and I never 24 complained to them directly when they withdrew support 25 from the Labour Party.</p> <p style="text-align: center;">Page 52</p>

13 (Pages 49 to 52)

<p>1 Q. I'm not sure that Lord Mandelson is saying that. He's 2 making a personal observation, that you were personally 3 stung and that's something that --</p> <p>4 A. No, I don't think the word "stung" is correct, because 5 I expected it. It was something that you could read for 6 months previously. I think the manner in which they did 7 it was offensive, but that was their choice, but I don't 8 think that I was stung by it at all.</p> <p>9 Q. Many commentators have said, rightly or wrongly, that 10 you're someone who is obsessed by the news and therefore 11 from that obsession, if correct, more likely to be stung 12 by this sort of change of support. Is that a fair 13 observation or not?</p> <p>14 A. Well, you may say I'm so obsessed by the newspapers that 15 I barely read them, so -- I have to tell you that that 16 is not -- even in Downing Street, I didn't spend a great 17 deal of time reading newspapers at all.</p> <p>18 Obviously if you're in a job where you have 24-hour 19 questions about what's going on, you have to be able to 20 answer them, so you have to have someone that's telling 21 you: "You have to answer this question and that question 22 and that question", but as far as the editorialising of 23 the different newspapers, whether it be the Mail, the 24 Telegraph or the Sun or whatever, I can tell you 25 I didn't spend a great deal of time reading them.</p> <p style="text-align: center;">Page 53</p>	<p>1 LORD JUSTICE LEVESON: Yes. Mr Brown, periodically we give 2 the shorthand writer a break.</p> <p>3 A. Thank you very much.</p> <p>4 (11.30 am)</p> <p>5 (A short break)</p> <p>6 (11.39 am)</p> <p>7 MR JAY: Mr Brown, we're onto the issue of a phone call that 8 Mr Rupert Murdoch says took place. You'll recall his 9 evidence in relation to that.</p> <p>10 Can we look, please, first of all, at exhibit GB3B, 11 which is the last page of tab 4, which is a list of 12 telephone calls with Rupert Murdoch.</p> <p>13 A. Yes.</p> <p>14 Q. Can we understand, first of all, who has compiled this 15 list or what is the source of it?</p> <p>16 A. Any call I would have made with someone like 17 Rupert Murdoch would go through Downing Street. In 18 other words, there was a switchboard at Downing Street 19 which would take calls wherever I was in the world and 20 would link me up to whoever I wanted to speak to. So 21 any calls I had with Rupert Murdoch, or indeed anybody 22 else in this list, would have gone through Downing 23 Street and it is their list.</p> <p>24 Q. Thank you. Does this list include calls in, as it were, 25 as much as calls out?</p> <p style="text-align: center;">Page 55</p>
<p>1 Q. Are we to interpret your evidence then -- and we're 2 going to come to a particular event in a moment -- that 3 really you received this news in relation to the news 4 with complete equanimity?</p> <p>5 A. It was very strange, because I had phoned up the editor 6 of the Sun on the afternoon of my conference speech. 7 You know, every time I did a conference speech, or did 8 a budget, I used to phone the political editors or the 9 editors of the newspaper to ask if they had any 10 questions arising from your speech, and sometimes they 11 had more questions than others. If it was an unpopular 12 budget, they would have lots of questions. If it was 13 a popular budget, less so, and when it was a conference 14 speech, I would phone them up.</p> <p>15 I phoned the editor of the Sun up that afternoon, as 16 I phoned the editor of the Times, of course, that 17 afternoon, and he had one or two questions for me about 18 Afghanistan, and I think this may be 5 o'clock in the 19 afternoon, and he didn't mention at all that the Sun was 20 making this decision and it was to be announced in two 21 hours. So if the editor of the Sun, you talk to him and 22 he doesn't tell you what's happening, there doesn't seem 23 to be much point in phoning anyone else at the Sun after 24 that. So I just left it.</p> <p>25 MR JAY: Is that a convenient moment?</p> <p style="text-align: center;">Page 54</p>	<p>1 A. Yes. It would include a call that he had placed with 2 me, or anybody had placed it me, and a call that I had 3 placed to speak to anybody else, and it would include 4 calls that were transacted through a mobile phone as 5 well as through a fixed line phone, so it would include 6 any telephone conversation I had with someone like 7 Mr Murdoch.</p> <p>8 Q. When you were out of London, Mr Brown, was it ever your 9 practice to call out directly to someone, either from 10 your mobile phone or perhaps from a hotel phone?</p> <p>11 A. Not someone like Mr Murdoch. I would always go through 12 Downing Street because you would always want someone on 13 the phone call. You would want to have a record of what 14 was being said, and you would want to know exactly the 15 time you did the call and everything else. There's no 16 question that any phone call could have been made 17 without it going through this procedure.</p> <p>18 Q. May I turn that on its head and say that if for some 19 deliberate reason you didn't want there to be a record 20 of what was said, that might be a reason for arranging 21 the call to take place without going through Downing 22 Street?</p> <p>23 A. Well, I would never have done that. If I was calling 24 a newspaper proprietor or I was calling a political 25 leader around the world or calling someone about</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 a policy issue, I would always go through Downing Street</p> <p>2 because I would always want someone on the call to</p> <p>3 verify what happened. I don't think there's any doubt</p> <p>4 that that's the way that I did things, and that's the</p> <p>5 way that I think most people I know had been in the</p> <p>6 office that I'd been in would do things. So no call</p> <p>7 could have been made without it going through Downing</p> <p>8 Street in this way.</p> <p>9 Q. I'm just seeking to cover all possible options,</p> <p>10 Mr Brown.</p> <p>11 A. I understand that.</p> <p>12 Q. Did you have his number on your mobile phone?</p> <p>13 A. No. I wouldn't know Rupert Murdoch's phone number.</p> <p>14 I didn't engage in emailing or anything like that.</p> <p>15 There was one letter sent to him through an email, but</p> <p>16 it was sent through Downing Street. I wouldn't have any</p> <p>17 of the proprietors' numbers on my mobile phone. They</p> <p>18 would be mainly personal.</p> <p>19 Q. If we go to GB3B, we can see that there are two recorded</p> <p>20 phone calls in the year 2009, one in March, which is not</p> <p>21 relevant for our purposes, but one on 10 November 2009,</p> <p>22 which was 12.33 in the afternoon. Can you remember, was</p> <p>23 Mr Murdoch in New York on that occasion?</p> <p>24 A. I don't know where he was. I suspect he was in</p> <p>25 New York. I think he may have just come back from</p> <p style="text-align: center;">Page 57</p>	<p>1 someone said could be almost -- is totally illegible,</p> <p>2 yes.</p> <p>3 Q. Yes, although we have a transcription of it. I'm pretty</p> <p>4 sure I've seen one somewhere. The version we have at</p> <p>5 01917 is typed.</p> <p>6 There's another one, though, Mr Brown. 26 April,</p> <p>7 under tab 14 at page 01921.</p> <p>8 A. That's the handwritten one, I think. Yes. There's only</p> <p>9 three. One was November and the other two followed.</p> <p>10 Q. One was 5 April, which is only typed, one 26 April,</p> <p>11 which was handwritten, and the earlier one was December</p> <p>12 2009, so I think we've covered the three you've</p> <p>13 mentioned.</p> <p>14 Are you clear, Mr Brown, that you had no</p> <p>15 conversation with Mr Murdoch shortly after the</p> <p>16 withdrawal of support for you in the Sun, which was</p> <p>17 28 September 2009, in which you threatened to declare</p> <p>18 war on News International or uttered words to that</p> <p>19 effect?</p> <p>20 A. This is the conversation that Mr Murdoch says happened</p> <p>21 between him and me that -- where I threatened him and</p> <p>22 where I'm alleged to have acted in an unbalanced way.</p> <p>23 This conversation never took place. I'm shocked and</p> <p>24 surprised that it should be suggested, even when there's</p> <p>25 no evidence of such a conversation, that it should have</p> <p style="text-align: center;">Page 59</p>
<p>1 Australia. It was a call I placed because of what was</p> <p>2 happening over Afghanistan.</p> <p>3 Q. There's other surrounding evidence which bears on that</p> <p>4 call. In your exhibit GB1, under tab 2, at our</p> <p>5 page 14228, there's an email which you caused to be sent</p> <p>6 to Mr Murdoch on the evening of 10 November, which</p> <p>7 refers expressly to a telephone call you had earlier</p> <p>8 that day in relation to Afghanistan. Do you see that?</p> <p>9 A. Yes, that's absolutely right. I decided to follow up</p> <p>10 the phone call about Afghanistan with information that</p> <p>11 I thought would be of use to him about public support</p> <p>12 for the war in Afghanistan and what was actually</p> <p>13 happening to it, and I think it was originally sent as</p> <p>14 an email so he got it that day, but it was also sent as</p> <p>15 a letter to him. And there were two follow-up letters</p> <p>16 on Afghanistan, because there was a correspondence --</p> <p>17 three letters, one of which I think he submitted to this</p> <p>18 Inquiry, but three letters on Afghanistan over the next</p> <p>19 few months, and I may say that's the only time in</p> <p>20 government that I've ever had any letter communication</p> <p>21 with Mr Murdoch.</p> <p>22 Q. Yes. There was an email on 24 December 2009 in relation</p> <p>23 to Afghanistan, which is under our tab 2. Under our</p> <p>24 tab 14 -- this is Mr Murdoch's exhibit KRM 33 --</p> <p>25 A. I think that's mine. The famous handwriting, yes, which</p> <p style="text-align: center;">Page 58</p>	<p>1 happened. There was no such conversation. I decided</p> <p>2 after September 30, when the Conservative Party gained</p> <p>3 the support of the Sun, that there was no point in</p> <p>4 contacting them. As I said earlier, I'd never asked</p> <p>5 them for support directly, nor did I complain to them</p> <p>6 directly when they decided to support the Conservatives.</p> <p>7 So I didn't phone -- I didn't return calls to</p> <p>8 News International, I didn't phone Mr Murdoch, I didn't</p> <p>9 talk to his son, I didn't text him, I didn't email him,</p> <p>10 I didn't contact him. This was a matter that was done.</p> <p>11 There was no point in further communication about it at</p> <p>12 all, and I'm surprised that, first of all, there's</p> <p>13 a story that I sort of slammed the phone down on him,</p> <p>14 and secondly, there's now a story from Mr Murdoch</p> <p>15 himself that I threatened him. This did not happen.</p> <p>16 I have to say to you that there's no evidence it</p> <p>17 happened, other than Mr Murdoch's, but it didn't happen,</p> <p>18 because I didn't call him and I had no reason to want to</p> <p>19 call him, and I would not have called him, given</p> <p>20 everything I've said to you.</p> <p>21 Q. Finally on this point, so we're absolutely clear, one</p> <p>22 might say Mr Murdoch could be mistaken about the date</p> <p>23 and the call happened later. Is it possible that you</p> <p>24 might have uttered that sort of language during such</p> <p>25 a subsequent call?</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)



<p>1 A. No, there is only one further telephone call and that is  2 in November. And if I may say, the sequence that led to  3 that call was on the Monday, the Sun had said that I'd  4 disrespected our troops by not bowing at the cenotaph.  5 On the same Monday, they said that I'd written a letter  6 with 25 misprints and had been discourteous to a woman  7 for whom I have the utmost sympathy, who was the mother  8 of a deceased soldier, and I could understand that she  9 was upset but they had claimed that I'd done things  10 I hadn't done.</p> <p>11 Then on the Tuesday, I had taken a phone call – I'd  12 wanted to phone this lady to sympathise with her and to  13 explain that we thought a huge amount about her son and  14 his contribution to our country, that it may be little  15 comfort to get letters but it was important that she  16 knew how much the country valued the service of her son.</p> <p>17 The Sun had printed a partial version of that  18 conversation, which they had clearly had a mechanism for  19 taping which they shouldn't have had. The tape was in  20 their hands and it's very surprising for a conversation  21 with the Prime Minister and an ordinary member of the  22 public to appear in the Sun newspaper, but to appear in  23 this distorted way, with these headlines, "Bloody  24 shameful" and everything else ...</p> <p>25 I had concluded that the Sun were damaging our</p> <p style="text-align: center;">Page 61</p>	<p>1 He then asked me again, and for a third time, to  2 phone her, and I said, "Well, look, out of respect to  3 you, I will contact her", and that's how the  4 conversation ended, with me agreeing that I would talk  5 to her, and at the same time me sending the letter that  6 explained – as you can see, it's completely and  7 entirely about Afghanistan and what was happening to  8 Afghanistan and that's what the call was about.</p> <p>9 You see, the problem about this is that I can see  10 why it may suit people to say now that there was some  11 pre-orchestrated campaign against News International and  12 that I was threatening on a phone call and this is the  13 justification, so this is nothing to do with telephone  14 hacking, it's all to do with some political campaign  15 against News International. But this call did not  16 happen. The threat was not made. I couldn't be  17 unbalanced on a call that I didn't have and a threat  18 that was not made, and I found it shocking that we  19 should get to this situation, sort of some time later,  20 when there is no evidence of this call happening at the  21 time that he says it happened, and you to be told under  22 oath that this was the case and to be backed up by other  23 people from News International who had been continuing  24 to make comments about such a position.</p> <p>25 Now, I think, because we're dealing with a very</p> <p style="text-align: center;">Page 63</p>
<p>1 effort in Afghanistan and they were now persuading  2 people who were actually in favour of the war that there  3 was no point in supporting the war. And Mr Murdoch had  4 always told me that he supported what we were doing in  5 Afghanistan and I felt he should be aware of the facts  6 and how we were losing public support at a difficult  7 time, when we were trying to persuade the Americans and  8 the rest of Europe that we had to have a collective  9 effort not just to get more Afghan troops on the ground  10 but also to get more European troops supporting these  11 Afghan troops on the ground. So it was a very delicate  12 political moment, so I phone him on that basis and that  13 was what the call was about. There was no reference to  14 threats or Conservative parties or anything. I'm quite  15 surprised.</p> <p>16 In fact, the conversation ended in a quite different  17 way from what he says, because he asked me, given that  18 he said that there should be no personal attacks by the  19 Sun due to Afghanistan, which he supported – he asked  20 me would I phone Mrs Brooks, the editor of the – would  21 I have a phone call with her, where she would, he  22 hinted, want to apologise for what had happened, and  23 I said I saw no point in phoning her because the Sun was  24 pursuing this course of action and it was for him to  25 talk to her.</p> <p style="text-align: center;">Page 62</p>	<p>1 important issue, about the freedom of the press and  2 about the responsibility of the press and about whether  3 people had been either too hostile to News International  4 or too favourable to News International, it's important  5 that this is obviously cleared up. There is absolutely  6 no evidence for this phone call or for the threat or for  7 the judgment that Mr Murdoch made as a result of  8 something that he was never party to. The only call  9 that ever happened was in November, and it was about  10 Afghanistan, and it was weeks after when people allege  11 the call took place.</p> <p>12 Q. Mrs Brooks' account of the call that you mention, which  13 eventually you had with her on 10 November 2009 -- of  14 course, she was no longer editor of the Sun; she was now  15 chief executive of News International -- was that you  16 were angry and aggressive. Is that right or not?</p> <p>17 A. No, I don't think so, because I had come off a call with  18 Rupert Murdoch. I had written a letter to him about  19 Afghanistan, and out of respect to him I was phoning her  20 to hear what she had to say.</p> <p>21 Unfortunately, she wanted to tell me that the Sun  22 had got this tape of my phone call with Mrs James, who  23 was the very sad case of a lady whose son had died, and  24 she had a lot of questions to ask about this that I was  25 trying to help her with. But she tried to explain that</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 they had got this tape -- which, of course, was very 2 unusual circumstances, as I say, for a tape of 3 a conversation from Downing Street to appear suddenly in 4 the Sun newspaper -- and she wanted to tell me that 5 they'd got this entirely lawfully and everything else 6 had been checked and so on and so forth, and that was 7 really what the nature of the call was, but I didn't get 8 the sense that there was an apology coming from the Sun 9 and I decided that there was no point in continuing the 10 conversation. But it ended without acrimony. It was 11 simply a conversation where she tried to tell me that 12 they'd got this information in totally appropriate ways.</p> <p>13 Q. It sounds as if, Mr Brown, you had every reason to be 14 angry and aggressive but you managed not to show it. Is 15 that the message you're communicating?</p> <p>16 A. I think that when things are very difficult, you tend to 17 be very calm indeed, and it was difficult because we 18 were going through a period where the whole Afghanistan 19 war effort was being, in a way, undermined by what 20 I thought was a campaign on the part of the Sun that was 21 alleging that we didn't care at all about our troops, 22 and it was this distortion of fact and opinion that 23 worried me, but on the other hand, I felt that the Sun's 24 position was that they should be supporting the war in 25 Afghanistan, and as my letters to Rupert Murdoch show,</p> <p style="text-align: center;">Page 65</p>	<p>1 you take time to write him this personal handwritten 2 letter at all?</p> <p>3 A. Because Mr Murdoch had replied, and for the first time 4 Mr Murdoch had said, which he had never said to me 5 before, that he disagreed with the management of the war 6 effort.</p> <p>7 All my conversations with Mr Murdoch were perfectly 8 civilised and were courteous and, as you can see, 9 I wished him and his family well at the end of my 10 letters and everything else. And then suddenly, out of 11 the blue in our correspondence, he says, "I disagree 12 entirely with the management of the war effort", and 13 I felt that merited a reply. This was the first time 14 he'd said to me personally that this is what he thought. 15 I didn't understand what he meant by "the management of 16 the war effort", because we had put extra resources in, 17 and equally I've heard very little about complaints of 18 the management of the war effort since, and it seemed to 19 me that he was making a political point and I wanted him 20 to know that he had never said this before and that 21 I asked him to reconsider it.</p> <p>22 If you look at the letter, it says, "I'm surprised 23 to hear these views from you personally because you've 24 never said them to me in any conversation we've had and 25 would you like to reconsider these views?" And I said</p> <p style="text-align: center;">Page 67</p>
<p>1 I tried to persuade him by argument that this was the 2 right way to move forward, not by anything other than by 3 putting the facts to him.</p> <p>4 LORD JUSTICE LEVESON: I think that if I'd been persuaded to 5 phone somebody to listen to an apology and to be greeted 6 with the opportunity, as it were, to investigate further 7 a private conversation, I think I'd be rather irritated.</p> <p>8 A. I think in these circumstances, when you're surprised at 9 what comes back to you -- look, Mr Murdoch had given me 10 the impression that an apology was forthcoming. He also 11 gave me the assurance that the Sun were going to remove 12 this personal element of their attacks over Afghanistan. 13 I didn't ask him for these assurances; he offered them. 14 And I didn't discuss other issues with him, and 15 therefore to some extent that was where the conversation 16 lay, but it was really finding out that this was not 17 necessarily how the Sun was going to proceed that was 18 the surprise to me, but I don't think I was aggressive.</p> <p>19 LORD JUSTICE LEVESON: Well, you might have a thicker skin 20 than I might have had.</p> <p>21 A. I think when you're dealing with some of these issues, 22 you tend to be calmer when you're dealing with them.</p> <p>23 MR JAY: The last letter you wrote to Mr Rupert Murdoch, the 24 handwritten one of 26 April 2010, was in the General 25 Election campaign. You had other things to do. Why did</p> <p style="text-align: center;">Page 66</p>	<p>1 to him, "Look, no matter what the Sun and the Times 2 does, I'm afraid I would rather have been an honest 3 one-term Prime Minister than a dishonest two-term 4 Prime Minister."</p> <p>5 Whatever happened, I said, "Look, we are pursuing 6 a campaign in Afghanistan that I believe is right. If 7 the Sun is undermining it, even though it says it's 8 supporting it, I have to tell you that that is the case, 9 but given that this is the first time you've criticised 10 the management of the war effort as an individual, I'd 11 like to know what you were thinking of when you did so", 12 and I didn't actually have a reply to that letter. He 13 didn't think it necessary to reply.</p> <p>14 Q. But isn't it obvious, Mr Brown, that you cared very much 15 about this? It was a personal attack on you and it 16 might be said to show that you do care deeply about what 17 newspapers write about you and about ad hominem attacks 18 of this sort.</p> <p>19 A. Look, there were two big issues during the period I was 20 Prime Minister. One was the global economic crisis, 21 which we had to deal with and we took extraordinary 22 action in Britain and I believe that we led the way, and 23 I feel that international leadership is something that 24 is needed. The second one was Afghanistan, where we 25 dealt with a hostile media, but at the same time we were</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 trying to prevent Taliban control in areas where the 2 Taliban are now in charge, I'm afraid, and it mattered 3 to me what was being done on Afghanistan and it mattered 4 to me that we got the policy right of persuading other 5 countries to contribute to the war effort and to 6 persuade people that we had to get the Afghan army and 7 police up and running.</p> <p>8 So these were not issues about me personally that 9 I was really trying to take up with Mr Murdoch. These 10 were issues of policy. So if you look at the letters – 11 and I suspect that they could only be looked at now 12 because the sequence of them is now presumably available 13 to people – you'll see that none of these letters refer 14 to the political views of Mr Murdoch or to the Sun or to 15 the News of the World or the Sunday Times. None of 16 that. It was all about the management of the war 17 effort, and I still feel to this day that huge damage 18 was done to the war effort by the suggestion that we 19 just didn't care about what was happening to our troops, 20 which clearly had an effect on public opinion and 21 clearly was something that I felt, as you can see, 22 strongly about.</p> <p>23 Q. I move off Mr Murdoch onto Mr Paul Dacre now and your 24 relationship with him. Some have described that as 25 personally close, although you weren't, of course, very</p> <p style="text-align: center;">Page 69</p>	<p>1 were chancellor, owing in part to your position on the 2 euro. Do you think that's a fair comment or not?</p> <p>3 A. I don't know whether it was. Look, one of the huge 4 dividing lines in British politics over the past 5 10 years has been the euro. Most of the newspapers, of 6 course, were against it.</p> <p>7 I was in a minority within our government for a very 8 long period of time of being sceptical about the euro. 9 My colleague, Ed Balls, who was the economic adviser to 10 the Treasury at the time and was later a Member of 11 Parliament, did this enormous amount of work that proved 12 to my satisfaction that the euro couldn't work, but it 13 was a hugely divisive issue. But if the Daily Mail 14 supported the objections that I had to the euro, then 15 that's absolutely understandable, but I'm afraid to say 16 on just about every other issue they were wholly against 17 us and they wanted to see a Conservative government, as 18 you know.</p> <p>19 Q. Were policies such as the u-turn on casinos, 20 reclassification of cannabis and the retreat on 24-hour 21 drinking attempts to appease the Daily Mail in your 22 view?</p> <p>23 A. No. If you look at each one of these individual 24 issues – and I don't want to bore you with them – 25 I personally have strong opinions, as an individual,</p> <p style="text-align: center;">Page 71</p>
<p>1 often on the same page politically. Is that a fair 2 description?</p> <p>3 A. I didn't see Mr Dacre that much, as you can see from the 4 records. Mr Dacre and I disagreed about many things on 5 politics. I think he, like me, believes that there 6 should be an ethical basis for any political system and 7 that that is an issue that is not properly addressed 8 both in our media and in our politics, so there is sort 9 of common ground on that, even though we may disagree 10 about what that means in practice.</p> <p>11 He was personally very kind, as Rupert Murdoch could 12 be personally very kind, when we had difficulties with 13 our child, our first child, and I have not forgotten 14 that. But to be honest, I got no support from the 15 Daily Mail. The Daily Mail was totally against the 16 Labour Party, and when it came to the election, you may 17 see that I had a meeting with Lord Rothermere, as 18 I talked to Paul Dacre, and I said, "Look, you're 19 entering a situation where you have a party that's got 20 a relationship with the Murdoch empire and their 21 commercial interests and you should be very wary of it", 22 and I did warn them that that was one of the problems 23 that was going to happen.</p> <p>24 Q. Some have said, including Mr Alastair Campbell, that the 25 Daily Mail was less hostile to you personally when you</p> <p style="text-align: center;">Page 70</p>	<p>1 about the evil of excessive gambling. I thought that 2 the 24-hour licensing was causing us problems, and on 3 cannabis, you know, I don't hold what is probably the 4 more conventional view about the effects of soft drugs, 5 so I was against the reclassification of cannabis and in 6 fact we reclassified it back.</p> <p>7 These are views that I hold personally and I hold 8 them quite strongly and I may say that probably I used 9 my position to persuade members of the government who 10 were not as keen on that policy as I was.</p> <p>11 Q. Can I ask you, please, about section 55 of the Data 12 Protection Act, the Information Commissioner's two 13 reports in 2006.</p> <p>14 At that time, when you were still Chancellor of the 15 Exchequer, it didn't fall directly within your policy 16 area, but do you recall considering the issues raised by 17 them or not?</p> <p>18 A. Not in huge detail at the time, but it became an issue 19 after I became Prime Minister and we had to make 20 a judgment. It comes back to this very important point 21 that I think we discussed at the beginning about the 22 protections that are available for the press where there 23 is a public interest defence for actions that they may 24 have taken that might initially sound unacceptable.</p> <p>25 And, you know, in the press complaints code there</p> <p style="text-align: center;">Page 72</p>

18 (Pages 69 to 72)

<p>1 are these three public interest defences. One is about  2 exposing criminal wrongdoing, another is about threats  3 to the security and safety of the realm, and another is  4 a bit more, I think, difficult, about whether deception  5 by an organisation or individual is being exposed, and  6 I felt quite strongly — and still do — that there has  7 to be a public interest defence available in these  8 circumstances, and that was what the — is basically my  9 own view about how you must have institutions outside  10 the state who have the power to question and hold  11 accountable the state, and no matter what we think about  12 the way that the media behaved in certain instances,  13 there is, in my view, a right to a public interest  14 defence.</p> <p>15 That's what we were debating after the Information  16 Commissioner made a number of proposals about data  17 protection, and I could understand the strength of  18 feeling that he brought to this, and therefore I was  19 anxious not to overrule him, but I could understand also  20 my own instinct that there had to be at least a public  21 interest defence in favour of the media where they had  22 ventured into areas where, for good public reasons, they  23 were exposing something that was wrong.</p> <p>24 Q. But following the consultation on the proposal to  25 introduce custodial sentences, the government's original</p> <p style="text-align: right;">Page 73</p>	<p>1 A. Yes.</p> <p>2 Q. He says:</p> <p>3 "About 18 months ago [he means on 10 September 2007]  4 I, Les Hinton of News International and Murdoch McLellan  5 of the Telegraph, had dinner with the Prime Minister  6 Gordon Brown. On the agenda was our deep concern that  7 the newspaper industry was facing a number of very  8 serious threats to its freedoms."</p> <p>9 Then he said:</p> <p>10 "The fourth issue we raised with Gordon Brown was  11 a truly frightening amendment to the Data Protection  12 Act."</p> <p>13 This is the amendment —</p> <p>14 A. I don't think there's any disagreement in these  15 accounts. He had it on his agenda for the meeting.  16 They raised it, but I told them as they raised it:  17 "Look, this is my view." I didn't say, "I'm waiting to  18 hear your view"; I told them: "This is my view."  19 I remember this distinctly. I had already made up my  20 mind before I went into the meeting, and I told Jack and  21 Michael that there should be a public interest defence  22 and that we should probably postpone the implementation  23 of this clause.</p> <p>24 Look, at that time, of course, we didn't have all  25 the information we now have about the abuse of this —</p> <p style="text-align: right;">Page 75</p>
<p>1 position — and this is when you were in charge — was  2 to introduce such custodial sentences, and Mr Jack Straw  3 gave us evidence about it.</p> <p>4 A. Yes.</p> <p>5 Q. There was a dinner you had with Messrs Hinton, McLellan  6 and Dacre on 10 September 2007.</p> <p>7 A. That's right.</p> <p>8 Q. Which we have in tab 34 of this bundle. Do you remember  9 the issue being discussed on that occasion?</p> <p>10 A. I remember the issue. I told them, as we started the  11 dinner, what my own view was. I didn't ask them for  12 their view, I'm afraid. Maybe I should have. I told  13 them what my view was, that there should be a public  14 interest defence, and therefore it wasn't a question of  15 them lobbying me. I was informing them that this was my  16 view, but that Michael Wills, who was an excellent  17 minister, and Jack Straw, who was doing a great job on  18 this, were consulting people about how we could  19 implement this in a way where there was a public  20 interest defence but we weren't going to back off  21 entirely the potential need for legislation.</p> <p>22 Q. Mr Dacre's account doesn't quite match that, Mr Brown.  23 Under tab 34, he gave a speech to the Society of Editors  24 conference on 9 November 2008. So it's about 16, 17  25 months after the relevant date.</p> <p style="text-align: right;">Page 74</p>	<p>1 of data by the media. At that time, there was no  2 suggestion that there was anything other than what was  3 called the rogue hacker. But again, my instinct is  4 still the same, that there ought to be a public interest  5 defence. I know it's uncomfortable, because you are  6 balancing off two freedoms, as we said at the beginning.  7 You have this right that I would defend for people to  8 have privacy, and you have this right of the media,  9 I would say the individual, to express themselves and  10 for the media to do this through a freedom of speech and  11 therefore a willingness or ability to investigate things  12 that are wrong, and you are balancing off these two  13 freedoms.</p> <p>14 It seemed to me that we may end up with the  15 custodial sentences, and that was an option that was  16 left to us. We said we'd come back to this, but at that  17 time we thought that — let us look at whether a public  18 interest defence can be introduced into this  19 legislation, which is what we did.</p> <p>20 Now, these are very, very difficult issues, and  21 I thought about them at the time, I've thought about  22 them since. I would still hold to the idea of a public  23 interest defence, but I think we're now on a course  24 where there will almost certainly be custodial  25 sentences. But I think as the government of the day has</p> <p style="text-align: right;">Page 76</p>

19 (Pages 73 to 76)

<p>1 said, they want to rely on your final judgment on this</p> <p>2 as well, before they make a decision.</p> <p>3 LORD JUSTICE LEVESON: Yes, it's quite important to be quite</p> <p>4 careful about this. What the data protection amendment</p> <p>5 did was to introduce a public interest defence to data</p> <p>6 protection offences.</p> <p>7 A. Yes.</p> <p>8 LORD JUSTICE LEVESON: But it wasn't for a moment suggesting</p> <p>9 in relation to other breaches of the criminal law that</p> <p>10 there should be a public interest defence.</p> <p>11 A. No, it was in relation to Data Protection Act; you're</p> <p>12 absolutely right.</p> <p>13 LORD JUSTICE LEVESON: Correct.</p> <p>14 A. I hope I'm not overelaborating on the argument, but it</p> <p>15 seemed in that instance there was a case for a public</p> <p>16 interest defence.</p> <p>17 LORD JUSTICE LEVESON: I understand. But you're not</p> <p>18 suggesting -- or are you suggesting, an open question --</p> <p>19 that there should be a public interest defence in</p> <p>20 relation to any crime?</p> <p>21 A. No, I'm not saying that, but what I am saying is that</p> <p>22 I do think that the press -- you're looking again at the</p> <p>23 Press Complaints Council guidelines and one of these</p> <p>24 guidelines -- I think it's the editors' rules --</p> <p>25 LORD JUSTICE LEVESON: Code.</p> <p style="text-align: center;">Page 77</p>	<p>1 would suggest going further than that. Of course, the</p> <p>2 fact that the defence can't be made out doesn't mean</p> <p>3 that everybody who is convicted then goes directly to</p> <p>4 jail. There are an enormous number of variations that</p> <p>5 will always be taken into account.</p> <p>6 A. Yes. I think maybe I've been misunderstood. My</p> <p>7 position was in relation to the Data Protection Act, but</p> <p>8 I was conscious that there was a public interest set of</p> <p>9 issues raised in the Editors' Code and it seemed to me</p> <p>10 this was reasonable.</p> <p>11 MR JAY: Mr Dacre's account is that you were hugely</p> <p>12 sympathetic to the industry's case and promised to do</p> <p>13 what you could to help. It sounds as if the industry,</p> <p>14 through Mr Dacre, Mr Hinton and Mr McLellan, were</p> <p>15 allowed to put their case and you were persuaded by it;</p> <p>16 is that fair or not?</p> <p>17 A. I distinctly remember this conversation and I think</p> <p>18 Mr Dacre, if you asked him under cross-examination,</p> <p>19 would confirm that at the beginning of that discussion,</p> <p>20 I said, "Look, I am persuaded that we need this public</p> <p>21 interest defence and we've been talking about how we can</p> <p>22 do this."</p> <p>23 I'd also, I think, either before or after, made a</p> <p>24 speech on liberty. I think I've sent you an extract</p> <p>25 from it. I felt that the debate in Britain had become</p> <p style="text-align: center;">Page 79</p>
<p>1 A. -- suggests that there is a public interest at stake</p> <p>2 where three things are in issue that have to be taken</p> <p>3 into account when judgments are made.</p> <p>4 LORD JUSTICE LEVESON: That's --</p> <p>5 A. Yes, of course.</p> <p>6 LORD JUSTICE LEVESON: -- entirely right.</p> <p>7 A. And I bore that in mind as well when I was looking at</p> <p>8 this issue.</p> <p>9 LORD JUSTICE LEVESON: That's a defence to an allegation of</p> <p>10 breach of the code.</p> <p>11 A. Yes.</p> <p>12 LORD JUSTICE LEVESON: Let me ask you this, again in an</p> <p>13 entirely open way. Of course, in relation to any</p> <p>14 criminal offence, if a journalist is acting in the</p> <p>15 public interest or reasonably believes that he or she is</p> <p>16 acting in the public interest, then that must be an</p> <p>17 important feature. It's why I asked the</p> <p>18 Director of Public Prosecutions whether he would be</p> <p>19 prepared to consider publishing a policy on his approach</p> <p>20 to the public interest in relation to prosecution of</p> <p>21 journalists for a crime where there is no statutory</p> <p>22 defence, and as you know, he's done so and he's</p> <p>23 consulted on it.</p> <p>24 A. Yes.</p> <p>25 LORD JUSTICE LEVESON: I'm just keen to know whether you</p> <p style="text-align: center;">Page 78</p>	<p>1 coloured by what we'd had to do in relation to</p> <p>2 terrorism, and you know that it was very controversial,</p> <p>3 that we wanted to have, for example, a longer period of</p> <p>4 potential detention for people who were terrorist</p> <p>5 suspects. But I felt, on a whole range of other areas</p> <p>6 where liberty was an issue, we could do better. We</p> <p>7 could do better about the freedom of assembly, we could</p> <p>8 do better about the freedom of speech, we could do</p> <p>9 better about the freedom of the press. So I made</p> <p>10 a speech on liberty.</p> <p>11 Now, these were my views. These were not the</p> <p>12 media's views. These were not Mr Dacre's views. These</p> <p>13 were not anybody else's views. These were my views. It</p> <p>14 was an issue that I felt strongly about. I felt that</p> <p>15 America branded itself to the world as a country of</p> <p>16 liberty and was able to persuade people that liberty was</p> <p>17 invented in America. In fact, the ideas of liberties</p> <p>18 that lay behind the British constitution and some of the</p> <p>19 things that we valued greatly had originated in Britain</p> <p>20 and I wanted to make that clear.</p> <p>21 So these were my views and I think any suggestion</p> <p>22 that I was under pressure from the industry and yielded</p> <p>23 to it is quite ridiculous. I was prepared to say that</p> <p>24 this is my view and I'm still prepared to say that it's</p> <p>25 my view.</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 Q. Were you aware that there already was a public interest 2 defence in Section 55 of the Data Protection Act? 3 <b>A. Yes.</b> 4 Q. The speech you referred to, 25 October 2007 under 5 tab 3 -- this obviously postdates the dinner we're 6 referring to by about six weeks. 7 <b>A. Yes.</b> 8 Q. Arguably, if you look at the second paragraph of the 9 speech -- 10 <b>A. What tab is that?</b> 11 Q. It's tab 3, page 14235. 12 <b>A. I think I remember what I said.</b> 13 Q. You're still referring there to taking into account -- 14 LORD JUSTICE LEVESON: I think it is behind tab 3 of 15 volume 1. 16 <b>A. I have the wrong volume. That's a fundamental mistake.</b> 17 MR JAY: Confusingly, Mr Brown, although it's the second 18 page of the speech, it bears the number 6 on the top 19 right. 20 LORD JUSTICE LEVESON: I think it's an extract from the 21 speech. 22 <b>A. It's not the full speech. I wouldn't want to bore you 23 with all the detail.</b> 24 Q. Towards the bottom you say: 25 "But Jack Straw has asked the Information Page 81</p>	<p>1 MR JAY: It's also noteworthy in this speech that you said, 2 towards the top of this same page: 3 "No case for statutory regulation of the press. 4 Self-regulation of the press should be maintained." 5 <b>A. Yes.</b> 6 Q. In other words, the status quo is adequate. Is that 7 correct? 8 <b>A. We had no mandate for that. We had never proposed that 9 that should happen. I think Tony Blair explained in his 10 own evidence that we had decided that this was not 11 a priority for us, so it was not part of our mandate and 12 therefore it was obvious that that was not what we were 13 doing.</b> 14 Q. So is your evidence that you didn't respond to the 15 lobbying of you at dinner on 10 September 2007 and 16 modify the government's existing proposals to take into 17 account of a powerful press view? 18 <b>A. I felt strongly about this myself. I'm not sure that 19 every other minister felt as strongly as I did, but I've 20 explained the background to my own views. So I really 21 didn't need persuading by Mr Dacre about this. This 22 was -- or by Mr Hinton or who else was there, I don't 23 know.</b> 24 Q. But is it your evidence that you had a conversation with 25 Mr Straw before 10 September 2007 in which your Page 83</p>
<p>1 Commissioner to produce guidance in consultation with 2 the PCC to make sure we take into account concerns about 3 the new rules which allow for a prison sentence of up to 4 two years." 5 So at that point, was your thinking still that will 6 a custodial sentence was appropriate? 7 <b>A. Yes, I think the issue was whether we would trigger the 8 two-year sentence at a later stage, while leaving it in 9 the legislation.</b> 10 Q. That didn't come as an idea until March of 2008 -- 11 <b>A. Yes.</b> 12 Q. -- from documents we have at tab 28. 13 <b>A. Yes.</b> 14 LORD JUSTICE LEVESON: What you're saying here is that clear 15 guidance will make sure legitimate investigative 16 journalism is not impeded. So you're very keen to 17 protect legitimate investigative journalism, but where 18 that is not triggered, then there should be a sanction 19 to protect individual privacy? 20 <b>A. Yes.</b> 21 LORD JUSTICE LEVESON: That's precisely what you're saying. 22 <b>A. I say:</b> 23 "... but the sanctions provide a strong deterrent to 24 protect individual privacy." 25 <b>Yes.</b> Page 82</p>	<p>1 scepticism was communicated? 2 <b>A. I think we were having conversations quite a lot about 3 some of these things. I mean, these are things that 4 arise from time to time. I don't think there was any 5 formal meeting about it, but I think we were having 6 conversations.</b> 7 Q. But his evidence was along the lines that, owing to time 8 pressures with the criminal justice and immigration 9 bill -- it had could come in before 7 or 8 May 2008 -- 10 a rapid compromise was carved up, as it were, and that 11 process started in March 2008. Do you recall that? 12 <b>A. I recall conversations with Mr Michael Wills, who was 13 the minister, and Jack Straw, who was the minister, and 14 I had this view that we could find a way forward and 15 I think in the end we did.</b> 16 Q. We turn now to the issue of special advisers. 17 <b>A. Yes.</b> 18 Q. I'm asked to put to you a number of questions about 19 them. Mr Campbell, in his second witness statement at 20 paragraph 64, suggested there was a real problem with 21 a Treasury special adviser, and by that he means 22 Mr Whelan, who was one of your appointments. Do you 23 agree with his analysis? 24 <b>A. Look, there was tittle tattle, rumour, gossip. 25 Political advisers, there's lots of them around, they're</b> Page 84</p>

21 (Pages 81 to 84)

<p>1 having debates and arguments.</p> <p>2 The one thing I insisted upon — and I think this</p> <p>3 deals with this point about Mr Campbell — is our</p> <p>4 political advisers worked through the head of</p> <p>5 communications, who was a civil servant, so anything</p> <p>6 that they did in relation to the press they had to</p> <p>7 report to and through the head of the civil — the civil</p> <p>8 servant head of our communications, and that's how we</p> <p>9 dealt with these issues.</p> <p>10 Q. But were not Messrs Whelan and McBride systematic</p> <p>11 perpetrators of selective anonymous briefings, either at</p> <p>12 your instigation or with your knowledge?</p> <p>13 A. No, I wouldn't say that at all. I mean, I operated or</p> <p>14 asked them to operate under these rules, that they would</p> <p>15 work to their head of communications, who was a civil</p> <p>16 servant, and he would have to report to me if things</p> <p>17 were wrong.</p> <p>18 Q. So if they did indulge in this behaviour, that would be,</p> <p>19 by definition, without your knowledge; is that correct?</p> <p>20 A. It would be without my knowledge and without my</p> <p>21 sanction.</p> <p>22 Q. Okay, we'll come back to that.</p> <p>23 Mrs Brooks, in her witness statement, paragraph 61,</p> <p>24 states that Tony Blair and his aides were convinced that</p> <p>25 Gordon Brown and his aides had conspired together in</p> <p style="text-align: center;">Page 85</p>	<p>1 we changed the system when we went to Number 10 and why</p> <p>2 I thought it was better to have — political advisers</p> <p>3 were a new development from the 1970s onwards. You had</p> <p>4 always worked with civil servants without political</p> <p>5 advisers. You bring in political advisers and they're</p> <p>6 obviously party people with their own views about what</p> <p>7 should happen. They had to find a way of working with</p> <p>8 the Civil Service, and my insistence was that the</p> <p>9 political advisers, who were doing a job, had to work</p> <p>10 under the auspices of the Civil Service head. This is</p> <p>11 what we tried to enact in the Treasury, and this is why,</p> <p>12 when I went to Downing Street, I removed the order in</p> <p>13 council, I said that we would not have a political</p> <p>14 appointee as head of communications, I appointed</p> <p>15 a traditional — a conventional civil servant as the</p> <p>16 head of communications and then, when he retired and</p> <p>17 went back to the Treasury — and incidentally went back</p> <p>18 to perform a policy job which he now does for the new</p> <p>19 government, which is of a different political colour —</p> <p>20 I appointed the person who had been previously head of</p> <p>21 communications at Buckingham Palace, who was not, in</p> <p>22 a sense, a career civil servant, but one who was trusted</p> <p>23 absolutely for both his discretion and his propriety.</p> <p>24 So I wanted to send a message that we wanted to work</p> <p>25 within these traditional channels and political advisers</p> <p style="text-align: center;">Page 87</p>
<p>1 order to force his early resignation. Do you agree with</p> <p>2 that analysis?</p> <p>3 A. I don't think that's Tony Blair's view and it's</p> <p>4 certainly not my view. This is — again, you're relying</p> <p>5 on second-hand conversations that are reported by people</p> <p>6 who are not participants in the events, so I don't take</p> <p>7 that as a serious comment about what happened.</p> <p>8 Q. But were your aides involved in using the media to force</p> <p>9 or attempt to force Mr Blair's resignation? This was in</p> <p>10 2006.</p> <p>11 A. I would hope not.</p> <p>12 Q. But were they involved?</p> <p>13 A. Well, I would hope not. I have no evidence of that.</p> <p>14 Q. Mr Blair said that he didn't know whether you,</p> <p>15 Mr Whelan, Mr McBride and Mr Balls were briefing against</p> <p>16 him in the media. Did you authorise your aides to brief</p> <p>17 against Mr Blair?</p> <p>18 A. No.</p> <p>19 Q. Do you think they may have done so without your explicit</p> <p>20 approval, even with your knowledge?</p> <p>21 A. If they did so, it was without my authorisation.</p> <p>22 Q. But it's the role of an aide or special adviser only to</p> <p>23 act with your express or implied authority; would you</p> <p>24 agree?</p> <p>25 A. No, I made it clear — I mean, I'm trying to explain why</p> <p style="text-align: center;">Page 86</p>	<p>1 were instructed to do exactly that. Now, if they</p> <p>2 failed, as happened in a terrible instance where</p> <p>3 Mr McBride had to resign, then they had to go.</p> <p>4 Q. Did you instruct your special advisers at the Treasury</p> <p>5 and at Number 10, while you were Prime Minister, to</p> <p>6 conduct off-the-record briefings with the press?</p> <p>7 A. No, but if the Civil Service head of communications was</p> <p>8 informed, then that was the way that anything would have</p> <p>9 to be done in relation to briefings. So there would</p> <p>10 have to be some communication between him and any</p> <p>11 political advisor if the press was being talked to.</p> <p>12 It's unrealistic to expect that a political adviser is</p> <p>13 never going to talk to the press. I think they had to</p> <p>14 go through the Civil Service head.</p> <p>15 Q. Lord Mandelson's book, page 461, states, describing</p> <p>16 Mr McBride as your attack dog:</p> <p>17 "... had developed a reputation for briefing against</p> <p>18 anyone who was perceived to threaten his boss'</p> <p>19 interests, not only the Tory opposition but those of the</p> <p>20 Blairite persuasion."</p> <p>21 Is Lord Mandelson correct or incorrect about that?</p> <p>22 A. This is what I mean about tittle-tattle. You know, you</p> <p>23 have gossip, rumour, innuendo. You have people saying</p> <p>24 something about someone else. I don't know the truth of</p> <p>25 all these things, but what I can say is that the people</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

<p>1 that worked for me were under specific guidance about</p> <p>2 what they had to do, and I think that's an important</p> <p>3 point in this. Were the rules there? And there were</p> <p>4 rules. Were they observed? In one very bad case, they</p> <p>5 were not observed and the person had to go.</p> <p>6 Q. He also notes a conversation he says he had with you in</p> <p>7 October 2008, when you invited him back into government,</p> <p>8 when he specifically raised the issue of Damian McBride</p> <p>9 with you and reached what he thought was a clear</p> <p>10 understanding that he would be transferred to the</p> <p>11 Cabinet Office as a stepping stone to departing</p> <p>12 altogether. Is Lord Mandelson's recollection correct</p> <p>13 about that or not?</p> <p>14 A. I think Peter was -- did not like Mr McBride. I don't</p> <p>15 think there's any doubt about that from -- this is the</p> <p>16 first time I've read this, by the way. This appears to</p> <p>17 be in his memoirs.</p> <p>18 But I can't remember -- Mr McBride was pushed back</p> <p>19 from a front line role and he was given a new role, but</p> <p>20 unfortunately in this new role he made a very bad</p> <p>21 mistake and he had to go. That's, I think, what</p> <p>22 happened. He wasn't doing his original role; he'd been</p> <p>23 pushed back to another role. I don't think it was in</p> <p>24 the Cabinet Office, I think it was still at Number 10,</p> <p>25 but he had to go.</p> <p style="text-align: right;">Page 89</p>	<p>1 Q. You were also warned by Ed Miliband and Douglas</p> <p>2 Alexander about Mr McBride?</p> <p>3 A. When I say there was a general view, I'm not excluding</p> <p>4 the fact that one or two people might have talked about</p> <p>5 it to me, but the fact is he was moved from his original</p> <p>6 role and he was moved back and then we had this incident</p> <p>7 where he had to go.</p> <p>8 I may say that Mr McBride was a career civil</p> <p>9 servant. He had worked his way up through Customs and</p> <p>10 Excise and the Treasury. He only became a political</p> <p>11 adviser in 2005. He was originally a fast-track civil</p> <p>12 servant.</p> <p>13 Q. There's also evidence that Jacqui Smith warned you about</p> <p>14 him as well. Do you remember that?</p> <p>15 A. Oh, I can't remember all these things.</p> <p>16 Q. It sounds as if a lot of peopling warning you about</p> <p>17 Mr McBride, but did you heed their warnings?</p> <p>18 A. What is material to this, I suspect, is you're wanting</p> <p>19 to understand what the relationship between political</p> <p>20 advisers and ministers is and how it worked itself</p> <p>21 through. I can only say this: that I was aware that we</p> <p>22 had to move Mr McBride from his original role to a new</p> <p>23 role. He had been moved into that new role and then we</p> <p>24 had this incident and he had to go. That's how it</p> <p>25 worked.</p> <p style="text-align: right;">Page 91</p>
<p>1 Q. But I'm back on October 2008 and I was just wondering</p> <p>2 whether you agree or disagree with Lord Mandelson's</p> <p>3 recollection in his memoirs of what he says --</p> <p>4 A. I don't think there's any doubt that Mr Mandelson didn't</p> <p>5 want Mr McBride, but I don't think there was any talk</p> <p>6 about Cabinet Office. I think we probably talked about</p> <p>7 how Mr McBride was moving back from what you might call</p> <p>8 the front line and he had a different role, but in the</p> <p>9 end it was only a few months later that he had to go.</p> <p>10 Q. Did either or both of Gus O'Donnell and Jeremy Hayward</p> <p>11 warn you specifically about Mr McBride?</p> <p>12 A. I don't remember in specific documentation or letters.</p> <p>13 They may have said something in conversations.</p> <p>14 Q. But did they, in the course of conversation, warn you</p> <p>15 about Mr McBride?</p> <p>16 A. I don't know whether you're talking about what happened</p> <p>17 in the leaking of these emails. They certainly would</p> <p>18 have talked to me about that when it happened, but I was</p> <p>19 very clearly of my own mind that he had to go.</p> <p>20 Q. No, I'm talking about an earlier warning --</p> <p>21 A. I don't recall other conversations. Perhaps you have</p> <p>22 better information from these people than I have, but</p> <p>23 I don't recall any conversations about that. There was</p> <p>24 a general view that some of them had that Mr McBride had</p> <p>25 to change his role.</p> <p style="text-align: right;">Page 90</p>	<p>1 Q. Did you instruct Mr Whelan to brief specifically against</p> <p>2 Mr Darling when he was Chancellor of the Exchequer?</p> <p>3 A. Not at all. Not under any circumstances.</p> <p>4 Q. You've seen the extract from Mr Darling's memoirs called</p> <p>5 "Back from the Brink", in which he's convinced that you</p> <p>6 did. Are you aware of that?</p> <p>7 A. Yes, but I didn't. I think this issue about "Back from</p> <p>8 the Brink", which again, I only read for the first time</p> <p>9 yesterday, this extract, is about an interview that</p> <p>10 Alastair gave to the Guardian, and I think the issue was</p> <p>11 he had been quoted as saying that he thought this was</p> <p>12 the worst crisis for the British economy for 60 years,</p> <p>13 when actually what he wanted to say or had said was that</p> <p>14 this was the worst global crisis for 60 years, and he</p> <p>15 told me that he wanted to go out and tell the media that</p> <p>16 that was the case. I mean, that's the incident.</p> <p>17 I don't think there was any disagreement about the</p> <p>18 interpretation.</p> <p>19 Q. Do you remember a conversation that you had with</p> <p>20 Mr Darling, which is noted in his book at page 108,</p> <p>21 where he told you specifically that he knew where the</p> <p>22 anonymous briefings were coming from and that they had</p> <p>23 to stop?</p> <p>24 A. I don't know. There may have been a conversation like</p> <p>25 that. I -- you know, this conversation within</p> <p style="text-align: right;">Page 92</p>

23 (Pages 89 to 92)



<p>1 government, everybody worries about who is saying what  2 about whom and so on and so forth. The one thing I can  3 say to you, which is absolutely clear -- and I'm not  4 sure how relevant this is to your conclusions, but the  5 one thing I can say to you definitely is that nobody in  6 my position would have instructed any briefing against  7 a senior minister, and Alastair Darling was a friend of  8 mine as well as a colleague.</p> <p>9 Q. There's reference as well -- it's not clear that these  10 were the words he uttered to you -- to Henry II's  11 utterings about Thomas Becket: "Will no one rid me of  12 this meddlesome priest?"</p> <p>13 Then he says:  14 "He didn't order his knights to go and kill Becket  15 but they believed that they had his blessing to do so."  16 Is that near the mark or not?</p> <p>17 A. These sound very dramatic comments. No, they're not  18 near the mark at all. Quite wrong and quite the  19 opposite of what actually happened.</p> <p>20 I think, if I may say, on the incident that you're  21 referring to, there was an interview given to the  22 Guardian and it was about the economic crisis and  23 Alastair was sure that he'd talked about the global  24 economic crisis and the Guardian had reported it as  25 being about the British economic crisis, and of course</p> <p style="text-align: center;">Page 93</p>	<p>1 who was blamed for giving him it. These things happen  2 in politics. People say things and do things and the  3 press says things. I don't recall anything about this  4 at all and I've never sort of been involved in  5 a briefing operation against John Major.</p> <p>6 Q. Is the position this, Mr Brown: that a sort of mythology  7 has built up around these special advisers, described in  8 certain quarters as paranoid attack dogs, or whatever,  9 but there's no evidential basis for it? Or is it the  10 position that if they did act in this way, it was  11 without your authority and instructions?</p> <p>12 A. Look, you have special advisers. They're part of the  13 government machine now. They're a new innovation. They  14 have a role to play in defending the minister and  15 defending the policy. You have competition between  16 special advisers in different departments because that's  17 the nature of politics. You have competition,  18 unfortunately, between ministers and departments, and  19 that's the nature of politics. The question is what you  20 read into this, as whether there's an abuse of the  21 constitution.</p> <p>22 I asked my political advisers to operate under very  23 distinct rules, and I actually had tougher rules than  24 was the general rule that was applied to political  25 advisers. After Mr McBride left, we toughened up the</p> <p style="text-align: center;">Page 95</p>
<p>1 the distinction was important but there was no tape of  2 the interview, the Treasury had no tape of the  3 interview, and that was the source of the problem, that  4 we couldn't get to the bottom of it because the Treasury  5 had not taken a tape, and I think that was the source of  6 the issue.</p> <p>7 Q. I've also shown you a letter from Sir John Major, who of  8 course is giving evidence tomorrow. It's dated 30 June  9 2008. He will, of course, give evidence about it but it  10 relates to the withdrawal of the Mugabe knighthood. He  11 makes the specific allegation that you briefed or you  12 instructed either Mr Whelan or Mr McBride -- he isn't  13 named specifically -- to brief against Sir John Major.  14 Is that correct or not?</p> <p>15 A. Mr Whelan was not, working for us at that time at all,  16 and Mr McBride -- I don't know which year you're  17 referring to.</p> <p>18 Q. This was June 2008.</p> <p>19 A. This was before he had gone. I don't know anything  20 about this, because I don't think, despite the fact that  21 my name is mentioned in this letter, Gus O'Donnell and  22 I talked about this in any detail, and I don't really  23 know much about this incident. I mean, I know that  24 Mugabe lost his knighthood. I doubt that when  25 Sir Fred Goodwin lost his knighthood, I was the person</p> <p style="text-align: center;">Page 94</p>	<p>1 rules even more about the use of equipment and  2 everything for personal purposes, and I was determined  3 that we could integrate the political advisers into the  4 Civil Service system.</p> <p>5 If it didn't work on occasion and if people behaved  6 badly on occasion, then that is not because there were  7 not rules that were there and instructions that were  8 given by me that should be followed, but I think we now  9 know enough about the nature of politics to know that  10 there's rumour, there's gossip, there's innuendo,  11 there's gossip and so on and so forth.</p> <p>12 The question is what you conclude from this. My  13 conclusion is that you need tough rules that people have  14 to follow, and if people don't obey the rules, then then  15 have to go. I'm not sure if gives us a general insight  16 into the way the media was behaving.</p> <p>17 Q. Well, the focus of this Inquiry is rightly, under its  18 terms of reference, the culture, practices and ethics of  19 the press.</p> <p>20 A. Yes.</p> <p>21 Q. But we're also looking at the conduct of each and  22 therefore the culture of the political class.</p> <p>23 A. Yes.</p> <p>24 Q. Are there any lessons to be learnt at all, if one looks  25 at the period 1997 to 2010, which is a 13-year period,</p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)

<p>1 as to the culture of the political class?</p> <p>2 A. Yes. As I said right at the beginning — and I don't</p> <p>3 know if you picked me up in the way that I might have</p> <p>4 expected. I said that we should have changed the lobby</p> <p>5 system and changed the system where people relied on</p> <p>6 exclusive briefings and had a far more open and</p> <p>7 transparent system of addressing the country through the</p> <p>8 press than we have even today, and I obviously have to</p> <p>9 take some responsibility for this. My only defence in</p> <p>10 this is that I tried after 2007 to change the rules.</p> <p>11 We actually have a consultation, by the way —</p> <p>12 I didn't mention this — about the future of the lobby,</p> <p>13 which Simon Lewis, who is a very honourable man, led,</p> <p>14 but we could find no consensus amongst the media about</p> <p>15 what could be done, and of course it was getting very</p> <p>16 near a General Election. But I would have preferred to</p> <p>17 have open briefings that were given by ministers to</p> <p>18 inform the press day by day. I'd looked at the White</p> <p>19 House system, I'd looked at other systems.</p> <p>20 So yes, there needed to be more openness. We</p> <p>21 inherited a system that was based on, if you like,</p> <p>22 exclusivity. It was also based on insiders winning over</p> <p>23 outsiders, so a lot of people were excluded from that</p> <p>24 system. The political advisers ought to and had to work</p> <p>25 under specific guidance and I believe they should have</p> <p style="text-align: center;">Page 97</p>	<p>1 A. The guidelines were, as I said, that they had to go</p> <p>2 through the official head of communications, who was</p> <p>3 a civil servant, and this is an issue that will have to</p> <p>4 be resolved at some stage because we've had political</p> <p>5 appointees as press offices and you cannot say that it's</p> <p>6 worked in its entirety. We've had civil servant</p> <p>7 appointees and it hasn't been wholly satisfactory</p> <p>8 because of what the press expects of the head of</p> <p>9 communications. I don't think we have an answer yet to</p> <p>10 what is a real problem about how you deal with the press</p> <p>11 on a day-to-day basis, but I would prefer a more open</p> <p>12 system, and I think that we will get to that at some</p> <p>13 point, and if your Inquiry, sir, can take us further on</p> <p>14 these roads and call for greater openness and</p> <p>15 transparency, I would welcome that.</p> <p>16 LORD JUSTICE LEVESON: Have you thought about how that might</p> <p>17 manifest itself?</p> <p>18 A. I would have thought that you move away from the daily</p> <p>19 briefings that is to what's called the lobby — this</p> <p>20 will be very unpopular with people who are now in the</p> <p>21 gallery listening to me, some of whom are in the</p> <p>22 lobby — that you would have someone who was briefing</p> <p>23 with the television cameras there, so it would be</p> <p>24 completely open. You would have to allow in press that</p> <p>25 are not part of the lobby system at the moment — and</p> <p style="text-align: center;">Page 99</p>
<p>1 worked under Civil Service leadership and we changed</p> <p>2 that when we went into Number 10 as well. So these are</p> <p>3 the lessons I learned about what some people call the</p> <p>4 spin culture.</p> <p>5 I come back to the point that it assumes a great</p> <p>6 deal of success in dealings with the media that I don't</p> <p>7 feel that I had. You know, in the 1970s, when I was</p> <p>8 a student, I read once that it was said the Shah of</p> <p>9 Persia, when he was still the Shah of Iran, had the</p> <p>10 worst press relations in the business and a British</p> <p>11 politician had raised an objection because his were</p> <p>12 somewhat worse than that, and I felt that if that had</p> <p>13 been said in the 1990s and up to 2010, I would have</p> <p>14 raised that objection.</p> <p>15 I did not have, unfortunately, good relations with</p> <p>16 the press, and I used to say myself about spinning —</p> <p>17 when people said, you know: "You guys are got good at</p> <p>18 getting your message across", I used to quote Shelley</p> <p>19 when Shelley was talking about a relative of his. He</p> <p>20 said he had lost the art of communication but not, alas,</p> <p>21 the gift of speech. I felt that I had got myself into a</p> <p>22 position like that before I finished office.</p> <p>23 Q. Did you, incidentally, issue any guidelines to your</p> <p>24 special advisers, either at the Treasury or at</p> <p>25 Number 10, or were they just left to get on with it?</p> <p style="text-align: center;">Page 98</p>	<p>1 that includes, of course, the new Internet media that is</p> <p>2 developing — and I think the Civil Service and the</p> <p>3 politicians have to work out a better relationship so —</p> <p>4 the danger is you have a Civil Service head that people</p> <p>5 think does not speak to behalf of the Prime Minister or</p> <p>6 the minister because he's not close enough, but the</p> <p>7 danger is you have an overpoliticised head who looks as</p> <p>8 if he or she is pushing the Civil Service in</p> <p>9 a particular direction.</p> <p>10 So I think you have this dilemma about how you</p> <p>11 organise the management of information, but I think the</p> <p>12 openness of it is much to be welcomed, and as I say to</p> <p>13 you, we did try to return to a situation where when you</p> <p>14 made an announcement in the House of Commons it was new</p> <p>15 information, and we did try to return to a situation</p> <p>16 where you made a speech and you were giving the</p> <p>17 information for the first time. But I'm afraid that the</p> <p>18 way things worked, these things were not reported. They</p> <p>19 were not seen as news in this highly competitive</p> <p>20 business in the media unless someone either had an</p> <p>21 exclusive or a group of people had an exclusive to these</p> <p>22 stories and felt that that was something that was news.</p> <p>23 So this competition between the different media</p> <p>24 outlets is intensifying, obviously. 24-hour news is</p> <p>25 a reality. Newspapers are in danger of being left</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 behind because they publish at a certain time, whereas</p> <p>2 the Internet is going all the time, and this will only</p> <p>3 intensify. Therefore I think more openness is an</p> <p>4 essential element of it, but of course the</p> <p>5 trustworthiness of participants is important to this as</p> <p>6 well.</p> <p>7 MR JAY: May I just touch on Mr Watson now, a different</p> <p>8 topic.</p> <p>9 A. Yes.</p> <p>10 Q. You address this at page 16 of your statement, our</p> <p>11 page 14222. Can I just be clear what your evidence is</p> <p>12 about this. You say that you can recall telling</p> <p>13 Mr Watson that the government had been under pressure</p> <p>14 from News International to sack him. Are we, back here,</p> <p>15 in 2006 in relation to the plot to dethrone Mr Blair, or</p> <p>16 are we --</p> <p>17 A. I think we're talking about a conversation that you've</p> <p>18 asked me about that Mr Watson had with me in 2010</p> <p>19 Mr Watson has phoned me up and he's asking me what's</p> <p>20 happening, and I remind him of what happened in the</p> <p>21 past. I'm not giving him new information, as far as I'm</p> <p>22 concerned, about something that happened in the last</p> <p>23 week. I'm telling him: "Look, you know when you were in</p> <p>24 government that News International had editorials, that</p> <p>25 they wanted you sacked, but you also know" -- and I did</p> <p style="text-align: center;">Page 101</p>	<p>1 News International had made it clear that they wanted--</p> <p>2 they didn't like him, of course, and I think they had</p> <p>3 editorials saying that Tom Watson had to go. I can't</p> <p>4 remember the detail of this.</p> <p>5 Q. Can you remember what the text says or is it still</p> <p>6 available?</p> <p>7 A. Well, they're not my texts. They're my wife's texts.</p> <p>8 I think you would have to ask her --</p> <p>9 Q. She might have communicated this to you.</p> <p>10 A. -- if you thought it was important. I think it</p> <p>11 communicated, if I'm right -- and this is all</p> <p>12 I remember, and I haven't asked for a text to be</p> <p>13 disclosed but it's your right to ask for them if you</p> <p>14 need them -- but I think it communicated a feeling about</p> <p>15 Mr Watson and that was it.</p> <p>16 Q. I don't think the issue is so important we're going to</p> <p>17 ask to see the text. Anyway, it's on your wife's phone.</p> <p>18 I have been asked to put to you this other question</p> <p>19 in relation to Mr Watson. In 2006, the media reported</p> <p>20 that he visited you at your house in Scotland before his</p> <p>21 resignation. Did you discuss any political matters at</p> <p>22 all with Mr Watson on that occasion?</p> <p>23 A. No. Our baby had just been born. He was bringing</p> <p>24 a present for our baby with his wife and his family, and</p> <p>25 we were talking about children. I mean, if I had known</p> <p style="text-align: center;">Page 103</p>
<p>1 say that Mrs Brooks had made her feelings about</p> <p>2 Mr Watson pretty well-known to my wife. That's all the</p> <p>3 new information I think I brought to this.</p> <p>4 Q. Yes. There may be a misunderstanding. That's why I was</p> <p>5 trying to tease this out. Did the text message you</p> <p>6 refer to relate to earlier events or did it relate to</p> <p>7 phone hacking? Can you remember?</p> <p>8 A. No, this was -- look, News International had taken the</p> <p>9 view that Tom Watson was to be held culpable for</p> <p>10 anything that had happened in 2006, I think, and this</p> <p>11 was still the line that they wanted to pursue.</p> <p>12 I don't want to get involved in this because I don't</p> <p>13 understand everything that happened. There was a legal</p> <p>14 case taken about defamation by Mr Watson and for all</p> <p>15 I know, there are still proceedings -- I don't know, but</p> <p>16 there was an animosity between News International and</p> <p>17 Mr Watson, and I was merely reporting to him, when he</p> <p>18 asked me about these things, that I was well aware that</p> <p>19 News International had wanted to get rid of him when he</p> <p>20 was a minister.</p> <p>21 Q. This was because of alleged machinations against</p> <p>22 Mr Blair, not because of his persistent pursuit of the</p> <p>23 phone hacking issue; was that correct?</p> <p>24 A. But you are putting words into News International's</p> <p>25 mouth. I don't know. All I reported to him was that</p> <p style="text-align: center;">Page 102</p>	<p>1 that he was planning any political initiative, I would</p> <p>2 have told him not to do it, but I knew nothing about it.</p> <p>3 Q. And the follow-up question was: did you discuss</p> <p>4 Mr Watson's subsequently published round-robin letter</p> <p>5 calling for Mr Blair's resignation --</p> <p>6 A. I think I've already answered that. If I'd known that</p> <p>7 he was planning anything like that, I would have told</p> <p>8 him to desist from this. This was a bad mistake, it was</p> <p>9 a wrong thing to do, and I told him so once I found out</p> <p>10 about it, but I didn't find out about it from</p> <p>11 a conversation with him.</p> <p>12 Q. So your evidence is this was entirely a social call to</p> <p>13 deliver a present for your baby; is that right?</p> <p>14 A. Entirely, because he had his family with him and they</p> <p>15 were talking to Sarah and they were talking about -- we</p> <p>16 were all talking about our children.</p> <p>17 Q. Mr Brown, you called for a judicial inquiry in September</p> <p>18 2010, in the sense that I think you wrote a letter to</p> <p>19 Lord O'Donnell. We have it at tab 35.</p> <p>20 A. Yes, I remember.</p> <p>21 Q. Sorry, he was Sir Gus then. Obviously, the context was,</p> <p>22 although you don't refer to it, the piece in the</p> <p>23 New York Times which was published on 1 September 2010;</p> <p>24 is that correct?</p> <p>25 A. Yes, and the report that was being done by the culture</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 and media committee. That was the prompting for --</p> <p>2 asking whether something had to be done.</p> <p>3 Look, we did not know about -- as I said in my</p> <p>4 speech in the House of Commons about this matter, we did</p> <p>5 not know about the extent of this phone hacking, and it</p> <p>6 only gradually became known to me that it could be</p> <p>7 considerably more than what had been reported and that</p> <p>8 this rogue hacker or rogue reporter was not a proper</p> <p>9 defence, but as the information became available and as</p> <p>10 I realised that this was a bigger issue than people had</p> <p>11 imagined, it seemed to me we had to look at what needed</p> <p>12 to be done.</p> <p>13 Now, the Home Secretary had looked at whether the</p> <p>14 police investigation should be extended to -- or be</p> <p>15 carried out by another body. I had to look, given that</p> <p>16 there was some media speculation at this time that there</p> <p>17 was a case for a public inquiry, as to whether there was</p> <p>18 a case for a judicial inquiry.</p> <p>19 Unfortunately, when I asked Sir Gus O'Donnell to</p> <p>20 look at this, he did not look at other evidence than</p> <p>21 simply the report of the Culture Select Committee --</p> <p>22 I think that probably was an unfortunate decision -- and</p> <p>23 therefore we had a report back that basically reflected</p> <p>24 the minimum amount of information that was available to</p> <p>25 the Select Committee and said nothing about any further</p> <p style="text-align: center;">Page 105</p>	<p>1 him at any stage, either before or after his election?</p> <p>2 A. This letter was independently done by me. I didn't</p> <p>3 consult anybody before I sent that letter.</p> <p>4 Q. No, I'm not suggesting that you needed to consult.</p> <p>5 A. Yes.</p> <p>6 Q. Did you discuss your concerns about the issue with</p> <p>7 Mr Miliband?</p> <p>8 A. I had expressed my concern to a number of people about</p> <p>9 what was happening, but I can't remember a specific</p> <p>10 conversation with Mr Miliband. Perhaps there was one,</p> <p>11 perhaps there wasn't. I did raise it with Mr Clegg,</p> <p>12 I remember, at one point.</p> <p>13 Q. Okay. Now may we look to the future, Mr Brown, and</p> <p>14 recommendations.</p> <p>15 A. Yes.</p> <p>16 Q. We know what you said in 2007 and we've seen that</p> <p>17 speech, the extracts of which you've kindly provided us</p> <p>18 with. In your witness statement, at page 14212, you set</p> <p>19 out some ideas for the future.</p> <p>20 A. Yes.</p> <p>21 Q. On the internal numbering, it's page 6, which we've</p> <p>22 carefully considered but can I just pick up some themes</p> <p>23 on where we are.</p> <p>24 Statutory backstop. Could you elaborate on that and</p> <p>25 differentiate between that and state regulation of the</p> <p style="text-align: center;">Page 107</p>
<p>1 information that was actually known within government at</p> <p>2 the time, including the Home Secretary's examination of</p> <p>3 this on his own bat.</p> <p>4 Q. To be fair to Sir Gus, the letter he wrote back to you</p> <p>5 on 10 September 2010 simply stated that the issue is now</p> <p>6 under review by the Metropolitan Police and also subject</p> <p>7 to an inquiry by the standards and prejudicial</p> <p>8 committee.</p> <p>9 A. You're talking about the second letter. My first</p> <p>10 request to him was before we left office.</p> <p>11 Q. Yes.</p> <p>12 A. And that was a request that he answer with a memo that</p> <p>13 I think you now have about the various pros and cons of</p> <p>14 taking action. It's at that point that I think we might</p> <p>15 have looked at the other evidence available within</p> <p>16 government and that's the point I'm making.</p> <p>17 When I wrote to him in September 2010, it was</p> <p>18 because further knowledge was available and that is the</p> <p>19 New York Times --</p> <p>20 Q. I'm focusing on the September 2010 issue because, as you</p> <p>21 rightly say, we've looked carefully with Lord O'Donnell</p> <p>22 at the March 2010 consideration.</p> <p>23 Can I ask you this: we know that Mr Miliband was not</p> <p>24 elected leader of the opposition until I think</p> <p>25 25 September 2010. Did you discuss these issues with</p> <p style="text-align: center;">Page 106</p>	<p>1 press?</p> <p>2 A. Can I just say, by way of introduction to this section,</p> <p>3 that I would make a distinction between two roles that</p> <p>4 this Inquiry might have, and indeed the way that further</p> <p>5 self-regulation or regulation may go. I think there is</p> <p>6 the issue of dealing with wrongs that have to be</p> <p>7 righted, redressed for individuals who have a complaint</p> <p>8 to make, and I've said, I think, pretty clearly in my</p> <p>9 evidence that I don't think the present system, much as</p> <p>10 it may be the better part of the complaint commission,</p> <p>11 the dealing with complaints is satisfactory.</p> <p>12 The second aspect, however, that I would urge you to</p> <p>13 look at is not just how we can deter the bad, but how</p> <p>14 far we can incentivise the good. If I'm right, there is</p> <p>15 a problem developing in this but also in every advanced</p> <p>16 country in the world about the quality of journalism and</p> <p>17 the commercial basis on which it can proceed, and if, in</p> <p>18 the 19th century, you had big proprietors and if, in the</p> <p>19 20th century, you had advertising that managed to</p> <p>20 finance quality journalism, there is a big issue now</p> <p>21 about what can incentivise or give support to quality</p> <p>22 journalism in the future.</p> <p>23 So I would just want to make, by way of</p> <p>24 introduction, if you're dealing with this, that yes, we</p> <p>25 can look at a better complaints system -- and you have,</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 sir, put on the website I think very, very good  2 guidelines for how we might proceed in sorting that  3 issue out, and I believe there will be all-party support  4 for doing so, and I know that that is important to you,  5 that there is all-party support — but I think we have  6 to look at a second issue, about the quality and  7 standards of journalism and how that can be improved,  8 and what we can do to help good journalists actually be  9 able to survive, based on their ability to sell their  10 content across the media and not just across newspapers.  11 That may demand quite radical thinking about how we  12 incentivise this for the future, including what happens  13 to the BBC licence fee, what happens to spectrum  14 auctions and the fees that come from that, and I think  15 these are all issues. There is going to be a real  16 problem in the next 20 years about how quality  17 journalism can flourish.  18 LORD JUSTICE LEVESON: Yes. When you made that comment at  19 the very beginning of your evidence, I wrote in the  20 margin: "How?" If you can answer that question, even  21 with some ideas, I will be very interested to hear them.  22 A. I have tried to give some thought to this. When the BBC  23 was set up in the 1920s and then developed its licence  24 fee system in the 1940s, it was clear that there was  25 a market failure. In other words, the finance that was</p> <p style="text-align: center;">Page 109</p>	<p>1 because their advertising model has collapsed,  2 basically, and therefore they're finding it more and  3 more difficult. I mean, every week, I see a local  4 newspaper going under.  5 So we have a problem about how we finance quality  6 journalism for the future and there are journalists who  7 are sitting here today who are in employment today, but  8 I think the quality journalism that we need and that  9 they represent for the future will have to find new ways  10 of financing it.  11 Is the BBC model of any use to us? I think we ought  12 to look at that. It certainly deals with this issue  13 that there is a public good that the market cannot  14 supply, and it certainly deals with the issue about how  15 you might apply this to the Internet, as well as to  16 broadcasting, because there is a zero cost in getting to  17 millions of people once you get to the first thousand of  18 people, and I would think that if we are genuine in  19 trying to root out the bad but also trying to encourage  20 the good, I think we have to say something about how  21 quality journalism in this country can be financed,  22 supported and really sponsored in the future.  23 This is a problem which is even greater in America,  24 and there's a huge debate now in America about how  25 quality journalism can survive, and there's some very</p> <p style="text-align: center;">Page 111</p>
<p>1 available for supporting quality broadcast journalism  2 and quality content was simply not there. There was  3 a market failure. So it had to be dealt with. Despite  4 what James Murdoch says in his MacTaggart lecture, it  5 had to be dealt with by taking action, and the action  6 which was chosen, which was popular for at least some  7 time, was the creation of the licence fee. And the  8 licence fee was to support quality journalism, and of  9 course, the argument in favour of it was that there were  10 great extra novelties, if you are an economist — there  11 were great benefits from high quality journalism, from  12 the educational effect of that, from getting trusted  13 information, and that there was a public good to be  14 supported that the market itself would not necessarily  15 support in broadcasting. Then, of course, there were  16 further benefits, because once you put it on  17 a broadcaster network, the marginal cost of delivering  18 it to millions of people as against thousands of people  19 was minimal.  20 Now, some of these arguments, in my view, now apply  21 to the Internet. There is a problem about the lack of  22 quality journalism. Most internal journalism has not  23 got the resources to be as, if you like, persuasive or  24 to be as trusted information as you would like it to be.  25 There is a problem now developing in the newspapers</p> <p style="text-align: center;">Page 110</p>	<p>1 good people joining that debate, but all I'm saying,  2 sir, if you forgive me for doing so, is that you can  3 deal with this issue about what I think was a terrible  4 injustice done to the Dowler family, innocent people who  5 had their rights trampled over, and we need to have  6 a complaints system that deals with that and we need to  7 have proper penalties and proper fines for dealing with  8 that, but we also have to look at how we not just  9 discourage the bad but encourage the good. And that's  10 not making a judgment about what's good and bad in  11 journalism; it's making a judgment that you will need  12 trained journalist and you will need medias like the  13 internet to be able to support that in future.  14 LORD JUSTICE LEVESON: But one needn't just look at the  15 journalism of the national newspapers. You've  16 commented -- and indeed it's been the subject of  17 evidence -- that local journalism is very much suffering  18 from the lack of advertising --  19 A. Absolutely.  20 LORD JUSTICE LEVESON: -- and the consequence is that local  21 issues therefore aren't reported as once they were, and  22 as more newspapers find it difficult to survive, the  23 loss of local information will be a very serious blow to  24 the development of local politics, the development of  25 holding local health boards, local countries to</p> <p style="text-align: center;">Page 112</p>

28 (Pages 109 to 112)

<p>1 account --</p> <p>2 A. Absolutely.</p> <p>3 LORD JUSTICE LEVESON: -- because nobody else will report</p> <p>4 it.</p> <p>5 A. This is why I defend the freedom of the press and the</p> <p>6 right of the press to have the powers that they have,</p> <p>7 because without shining the light on potential</p> <p>8 corruption or maladministration or the abuse of power --</p> <p>9 and that's true at a local level as well as at</p> <p>10 a national level -- people get away with doing things in</p> <p>11 an unaccountable manner that are completely</p> <p>12 unacceptable, and that's why you need a local press.</p> <p>13 I mean, there was a study done in America about what</p> <p>14 happened to a town where they were faced with -- I think</p> <p>15 it was a flooding or something, and because there was no</p> <p>16 local journalism in place and because the information</p> <p>17 could not flow properly, then citizens were being</p> <p>18 deprived of the means by which they could deal with this</p> <p>19 particular difficulty. This will continue to happen.</p> <p>20 LORD JUSTICE LEVESON: At least one of the witnesses who has</p> <p>21 given evidence has brought my attention to the</p> <p>22 development of the concept of free local authority</p> <p>23 newspapers, which then deprive the independent</p> <p>24 journalists of an opportunity to investigate their</p> <p>25 product.</p> <p style="text-align: center;">Page 113</p>	<p>1 that's a good thing -- when you don't have the research</p> <p>2 that is being done and the investigation that is being</p> <p>3 done to bring quality journalism.</p> <p>4 My point to you is that we can deal with the issue</p> <p>5 of complaints, and I think you have got excellent</p> <p>6 suggestions and I do applaud what you are trying to move</p> <p>7 to there, and I would emphasise, when I talk about the</p> <p>8 Press Complaints Commission, that without an</p> <p>9 investigative arm, it cannot be successful. The one</p> <p>10 thing you go to the Press Complaints Commission to get</p> <p>11 is a judgment on whether something is accurate or not,</p> <p>12 and when they reply to you, they say, "We cannot make</p> <p>13 a judgment on the accuracy of these statements", and</p> <p>14 therefore the one thing you ask them for, they cannot do</p> <p>15 because they have no investigative arm.</p> <p>16 That's one thing, but encouraging quality journalism</p> <p>17 is, I think, something that I hope that in your next set</p> <p>18 of evidence you might be able to consider.</p> <p>19 LORD JUSTICE LEVESON: I'll take that point very, very much</p> <p>20 on board.</p> <p>21 A. I may say I think there's quite a lot to learn from</p> <p>22 America, where this is a live debate.</p> <p>23 Sorry, I moved from the initial point of your</p> <p>24 question about self-regulation.</p> <p>25 MR JAY: Not at all. Mr Brown, the Prime Minister, as you</p> <p style="text-align: center;">Page 115</p>
<p>1 A. As you know, there's a debate about whether the BBC</p> <p>2 should be in local radio, whether it should simply be</p> <p>3 commercial radio, and how the integration of local</p> <p>4 newspapers with local broadcasting, with local</p> <p>5 television and local radio should happen.</p> <p>6 It's clear to me, however, that without some</p> <p>7 underpinning -- and it may be financial -- then there is</p> <p>8 a market failure here. There is not enough resources</p> <p>9 now to support the quality journalism that you are</p> <p>10 talking about. My own local newspaper has just had its</p> <p>11 editorial staff merged with the next door newspaper.</p> <p>12 They're running down the numbers of staff that are</p> <p>13 providing this local service and I think you would find</p> <p>14 this in every part of the country that you go into, and</p> <p>15 more than that, you're finding it all across the world</p> <p>16 now, because an internet journalist, who is someone</p> <p>17 who's sort of doing their own, if you like,</p> <p>18 self-journalism, can put their views up on a screen and</p> <p>19 put their views across the world, but if they're not</p> <p>20 resourced and they're not doing proper research and</p> <p>21 there's no investigative journalism, then we're</p> <p>22 diminishing the quality of the output that is available</p> <p>23 to us.</p> <p>24 So it's not a strict answer to this problem that</p> <p>25 there's more people communicating on the internet --</p> <p style="text-align: center;">Page 114</p>	<p>1 know, has said that the relationship between press and</p> <p>2 politicians needs to be reset. What, if anything, would</p> <p>3 you recommend in that regard?</p> <p>4 A. There has to be greater openness and transparency, as</p> <p>5 I've said, and I just repeat that.</p> <p>6 I don't think -- I do want to answer you previous</p> <p>7 question about regulation because I think it's</p> <p>8 important. I've never been one -- and this may sound</p> <p>9 surprising to people. Despite my discomfort with the</p> <p>10 press, I've never been one that has favoured heavy</p> <p>11 regulation or even regulation of the press. I've always</p> <p>12 looked for solutions that would avoid the idea that</p> <p>13 there was some form of interference in the press by</p> <p>14 politicians and I've always been very careful when we've</p> <p>15 talked about the BBC to make sure that we safeguard the</p> <p>16 independence of the BBC. So I start from this -- I said</p> <p>17 before it was a religious upbringing but the idea that</p> <p>18 people should be able to speak truth to power and the</p> <p>19 idea that the individual conscience is respected, free</p> <p>20 from state power, is very important to me.</p> <p>21 Now, what do you do in circumstances where you have</p> <p>22 a recalcitrant newspaper which will not join the Press</p> <p>23 Complaints Commission? This is a problem which I know,</p> <p>24 sir, you face. What do you do in circumstances where</p> <p>25 you have a Press Complaints Commission that actually is</p> <p style="text-align: center;">Page 116</p>

29 (Pages 113 to 116)

<p>1 not able to deal and has proved itself unable to deal 2 with these big issues? 3 In Ireland and Australia and New Zealand, they have 4 found a way to do — I think in one case they call it 5 statutory underpinning, is recognised in legislation but 6 not — 7 LORD JUSTICE LEVESON: That's the Irish method. 8 A. — not decreed by legislation, so I think there is a way 9 but I think we have less to fear from the proposals that 10 you're talking about, about a statutory underpinning, 11 than people think, and certainly if there are 12 recalcitrant members of the press who are not prepared 13 to join, I think your case is strengthened. 14 But I share your views that this has to be 15 independent of the politicians, it has to be independent 16 of — but it also has to be independent of the newspaper 17 editors. It has to be independent of both and it has to 18 be genuinely looked to and trusted as a source of fair 19 and balanced investigations and judgments. 20 MR JAY: Mr Brown, those are all the questions I had. 21 LORD JUSTICE LEVESON: Mr Brown, thank you very much. It's 22 all very easy to say; rather more difficult to seek to 23 achieve it, but thank you very much indeed for your 24 assistance. 25 A. I don't envy your job, but I know you're doing a great Page 117</p>	<p>1 what's coming, I don't think this is going to take you 2 by surprise. 3 A. I don't know what's coming but I'm happy to take the 4 question. 5 Questions by MR DAVIES 6 Q. Mr Brown, my name is Rhodri Davies. I appear for News 7 International. 8 A. Yes, I understood that. 9 Q. I think you're probably familiar with this. It's behind 10 tab 8 of your bundle. If you'd like to go to it, 11 it's ... 12 A. Tab 8 of my bundle? 13 Q. Yes. 14 A. The new bundle or the old one? 15 Q. That's a transcript of the evidence that Lord Mandelson 16 gave. 17 A. What day is it referring to, please? 18 Q. It's 21 May. 19 A. What day? 20 Q. Day 74. 21 A. No, what day is Mr Mandelson referring to? He was 22 referring to a call that took place when? 23 Q. He was. He was asked about whether or not there was 24 a call between you and Mr Murdoch shortly after the Sun 25 had announced that it was no longer going to support the Page 119</p>
<p>1 job. 2 LORD JUSTICE LEVESON: Thank you. 3 Oh, one moment, Mr Brown. Yes? 4 MR DAVIES: It relates, I'm afraid, to the disputed call 5 between Mr Brown and Mr Murdoch. 6 LORD JUSTICE LEVESON: Yes? 7 MR DAVIES: The position is you may recall that 8 Lord Mandelson gave some evidence about that. Mr Brown 9 hasn't addressed that and I think he ought to be given 10 the opportunity to deal with it, or at least, we would 11 like to know what he says about it. 12 LORD JUSTICE LEVESON: Do you want to put what 13 Lord Mandelson said? Do you have it to hand? 14 MR DAVIES: Yes, I have. 15 LORD JUSTICE LEVESON: Then by all means, let Mr Brown 16 respond. 17 A. Anybody else who wants to put questions as well, I don't 18 know. 19 LORD JUSTICE LEVESON: No, no. The position is, Mr Brown, 20 that the system permits core participants to put 21 questions through counsel and Mr Jay, I think, several 22 times has said, "I've been asked to ask this question", 23 and that's how he's done it, but if he declines to put 24 a question, then the core participants are entitled to 25 ask me for permission to ask the question. As I know Page 118</p>	<p>1 Labour Party on 30 September 2009, I think it was. 2 A. Mm. 3 Q. This is Day 74 in the afternoon. 4 A. I find this very difficult to read because of the light 5 type here. Perhaps you can just read out the section 6 that's relevant. 7 Q. I will do that. 8 A. I'm grateful. 9 Q. The questions are from Mr Jay: 10 "Question: "The allegation is, or rather the 11 evidence was from Mr Murdoch that Mr Brown said or 12 uttered the words 'declare war on News International' or 13 words to that effect. From your own knowledge, 14 Lord Mandelson, can you assist us as to whether there 15 was such a call? 16 "Answer: Well, I wasn't on the call. I hadn't been 17 patched into the call. 18 "Question: No, of course not. 19 "Answer: I assumed that there was the call because 20 I seem to remember the Prime Minister telling me that 21 Rupert Murdoch was not at all happy with the method and 22 timing of James and Rebekah's action. 23 "Question: What did the Prime Minister tell you, 24 Lord Mandelson, about the call? Did he communicate to 25 you that's what he told Mr Murdoch? Page 120</p>

30 (Pages 117 to 120)

<p>1 "Answer: No, he didn't say that. He told me what 2 Mr Murdoch had said to him. 3 "Question: So there was nothing about what Mr Brown 4 said to Mr Murdoch; is that your evidence? 5 "Answer: Yes, it is. I cannot remember being told 6 by Mr Brown what he said, and I have no way of knowing, 7 but I know – but I know what he said to me about 8 Rupert Murdoch's reaction, which was to say, basically: 9 'I don't like how it's been done and I think it's a bad 10 day to do it and I wouldn't have done it this way 11 myself, but that's life and we have to get on with it.' 12 "Question: Mr Murdoch's reaction to what, though, 13 Lord Mandelson? 14 "Answer: The decision of the Sun to switch support 15 from New Labour to the Conservative Party, which he has 16 said, if I recall correctly, was James and Rebekah's 17 decision, not the editor's, incidentally." 18 A. First of all, there was only one call with Mr Murdoch, 19 and it was on November 10, and that was a call that was 20 related to Afghanistan and you have five letters that 21 are affidavits from people who were on that call – four 22 of them on that call, one of whom had to report to 23 the press what happened afterwards – and they make it 24 absolutely clear that that call was about Afghanistan. 25 Whatever you're reading out, and whether you are</p> <p style="text-align: center;">Page 121</p>	<p>1 he said that you had in the evidence I've just read to 2 you? 3 A. I don't remember a conversation with Mr Mandelson about 4 this specifically, but if a conversation took place, it 5 would have been about a call on November 10, and it was 6 nothing to do with the support of the Conservative 7 Party; it was about support for Afghanistan. There was 8 no call on September 30. You're allowing me the chance 9 to make this absolutely clear, and News International 10 have produced not one shred of evidence that a call took 11 place, not one date for the call or time for the call. 12 You're not able to tell us what happened, except you 13 have these statements from Mr Murdoch that this 14 happened, and I do find it very strange that we're being 15 asked to debate a call that never took place, for which 16 you have no information about when it took place and 17 where Mr Murdoch was at the time and who was also on the 18 call. 19 MR DAVIES: Thank you very much, Mr Brown. 20 LORD JUSTICE LEVESON: Thank you. Thank you. 21 Mr Brown, thank you very much indeed. 22 (1.09 pm) 23 (The luncheon adjournment) 24 25</p> <p style="text-align: center;">Page 123</p>
<p>1 referring to that call I don't know, but the November 10 2 call is the only call I had in a year with Mr Murdoch. 3 I don't know if you're in a position to confirm that 4 that is the case on behalf of News International or not. 5 As for what happened on September 30, when the 6 Conservative Party was given the imprimatur, if you 7 like, of the Sun, there was no call. There was no 8 discussion, there was no text, there was no conversation 9 with Mr Murdoch at all, and I don't know how – I notice 10 that questions have come in from core participants, and 11 the suggestion is that somehow there was a mobile call 12 that hasn't been registered in Downing Street. I really 13 think News International is doing itself a great deal of 14 harm by trying to suggest that a telephone call took 15 place which never happened, and trying to suggest that 16 comments were made on that call that never were made, 17 and trying to suggest also that the attitude of the 18 person on the call was unbalanced when there was no call 19 at all. 20 So you must tell me whether you want to refer to 21 a call that was made on November 10, or a call that you 22 are claiming was made after September 30 which never 23 happened. 24 Q. Mr Brown, the only question I want to ask you is this: 25 did you have the conversation with Lord Mandelson that</p> <p style="text-align: center;">Page 122</p>	

31 (Pages 121 to 123)



A						
ability 46:22	10:2 21:16	24:14 25:6	84:23 86:2	84:22	attached 11:24	108:13 111:19
76:11 109:9	26:18 101:10	37:22 38:2,10	Andrew 44:10	appreciated 3:21	attack 24:3	112:9,10 121:9
able 32:1 41:17	addressed 3:15	38:11,16,18	angry 32:24	appreciation	68:15 88:16	badly 96:6
53:19 80:16	5:6 28:12 70:7	39:8 52:4 75:6	64:16 65:14	7:18	95:8	balance 9:15
109:9 112:13	118:9	75:15	animosity	approach 78:19	attacking 20:25	balanced 117:19
115:18 116:18	addresses 16:2	agendas 49:3	102:16	approached	attacks 62:18	balancing 76:6
117:1 123:12	addressing 97:7	aggressive 38:2	announce 23:9	36:15,18	66:12 68:17	76:12
absolutely 15:22	adequate 83:6	64:16 65:14	announced 1:22	appropriate 4:9	attempt 86:9	Balls 71:9 86:15
24:10 32:21	adjournment	66:18	23:9 54:20	4:12 65:12	attempted 37:6	bank 40:5 41:7
42:1 46:15	123:23	ago 1:13 6:4	119:25	82:6	attempts 71:21	Barclays 42:21
48:4 58:9	adopted 49:14	21:19 75:3	announcement	approval 86:20	attending 34:16	barely 53:15
60:21 64:5	advance 30:8	agree 24:19	50:20,23	April 49:13 59:6	attention 4:20	based 39:25
71:15 77:12	32:16	33:17 43:3	100:14	59:10,10 66:24	5:17 39:19	97:21,22 109:9
87:23 93:3	advanced 108:15	45:12 47:16	announcements	area 40:8 72:16	113:21	basically 42:16
112:19 113:2	advertised 41:6	84:23 86:1,24	22:14	areas 11:25 69:1	attitude 122:17	73:8 105:23
121:24 123:9	42:2	90:2	annoyed 37:7	73:22 80:5	auctions 109:14	111:2 121:8
abuse 75:25	advertisers 38:8	agreed 4:23	anonymous	arena 32:7	August 45:2	basis 1:11 47:10
95:20 113:8	advertising	agreeing 63:4	85:11 92:22	Arguably 81:8	auspices 87:10	62:12 70:6
abuses 15:6 29:4	14:23,25 38:6	agreement 20:10	answer 7:9,12,14	argued 50:2,6	Australia 45:20	95:9 99:11
accept 19:6 31:9	108:19 111:1	33:10 34:1,6	8:3 53:20,21	argument 66:1	46:23 58:1	108:17
34:20 41:2,21	112:18	34:10	99:9 106:12	77:14 110:9	117:3	bat 106:3
47:10	adviser 71:9	aide 86:22	109:20 114:24	arguments 85:1	authorisation	BBC 14:5 15:9
acceptable 4:6	84:21 86:22	aides 85:24,25	116:6 120:16	110:20	28:10 86:21	24:16,19 25:7
accepted 30:11	88:12 91:11	86:8,16	120:19 121:1,5	arises 8:10,13	authorise 86:16	25:11 37:9
50:17 52:15	advisers 84:16	aim 4:8 30:11	121:14	15:2 19:15	authorities 2:7	38:4 109:13,22
access 22:18 23:2	84:25 85:4	aims 24:17	answered 7:11	arising 54:10	authority 86:23	111:11 114:1
accompli 30:12	87:2,5,5,9,25	alas 98:20	104:6	arm 115:9,15	95:11 113:22	116:15,16
30:17 31:16	88:4 91:20	Alastair 70:24	answering 7:3	army 16:23,23	available 14:4	bear 1:21
account 4:16	95:7,12,16,22	92:10 93:7,23	8:8	16:24 21:6	15:11,21 26:24	bears 58:3 81:18
39:15 40:5	95:25 96:3	Alexander 91:2	answers 10:3	69:6	69:12 72:22	beast 20:8 21:17
52:11 64:12	97:24 98:24	alive 27:19	anticipate 5:2	arranging 34:14	73:7 103:6	beasts 23:17
74:22 78:3	advisor 88:11	allegation 78:9	anxious 31:22	56:20	105:9,24	Becket 93:11,14
79:5,11 81:13	affairs 40:6	94:11 120:10	73:19	arrived 11:2	106:15,18	becoming 16:24
82:2 83:17	affidavits 121:21	allegations 22:2	anybody 22:4	arrogance 24:15	110:1 114:22	begging 52:21
113:1	Afghan 21:6	allege 64:10	55:21 56:2,3	art 98:20	avoid 2:12	beginning 72:21
accountable 3:4	62:9,11 69:6	alleged 59:22	80:13 107:3	article 35:23	116:12	76:6 79:19
73:11	Afghanistan	102:21	118:17	articles 49:17	avoided 13:23	97:2 109:19
accountant 40:7	16:13 17:3,22	allegiances 1:17	Anyway 103:17	asked 1:19 5:2	aware 31:14	behalf 100:5
accounts 75:15	18:5,23 20:1	alleging 20:23	apart 12:12	7:25 15:17	35:12 48:19,22	122:4
accuracy 115:13	21:2 36:6,17	65:21	17:11	52:17,22,23	49:12 62:5	behaved 73:12
accurate 34:24	42:18 52:2	Alliance 35:1	apologise 62:22	60:4 62:17,19	81:1 91:21	96:5
52:14 115:11	54:18 58:2,8	allow 35:9 37:11	apologised 27:3	63:1 67:21	92:6 102:18	behaving 96:16
accuse 22:4	58:10,12,16,18	37:15 82:3	28:4	78:17 79:18		behaviour 2:5
accused 40:22	58:23 62:1,5	99:24	apology 65:8	81:25 84:18		3:11,24 85:18
achieve 117:23	62:19 63:7,8	allowed 24:24	66:5,10	85:14 95:22		believe 15:4 28:4
achieved 28:20	64:10,19 65:18	28:7 79:15	appear 8:5 35:20	101:18 102:18		28:16 29:13
acknowledge	65:25 66:12	allowing 123:8	61:22,22 65:3	103:12,18		38:14 51:7
41:4	68:6,24 69:3	Allsop 13:15	119:6	105:19 118:22		68:6,22 97:25
acrimony 65:10	121:20,24	all-party 109:3,5	appeared 27:22	119:23 123:15		109:3
act 30:15 52:8	123:7	altogether 89:12	40:25	asking 101:19		believed 4:19
72:12 75:12	afraid 21:3,5	ambit 25:20	appears 18:17	105:2		27:14 36:14
77:11 79:7	22:20 23:7	ambition 24:15	89:16	asleep 18:9,12		93:15
81:2 86:23	25:15 30:17	amendment	appease 71:21	aspect 108:12		believes 70:5
95:10	31:13 34:7	75:11,13 77:4	applaud 115:6	assaults 39:15		78:15
acted 59:22	41:15 47:18	America 17:12	application 1:6	assembly 80:7		benefit 1:9 23:1
acting 78:14,16	50:22 68:2	46:8,24 80:15	applied 15:19	assented 48:23		24:23 50:7,10
action 34:8 62:24	69:2 71:15	80:17 111:23	95:24	assist 120:14		benefits 49:22
68:22 106:14	74:12 100:17	111:24 113:13	apply 8:6 110:20	assistance 6:8		110:11,16
110:5,5 120:22	118:4	115:22	111:15	117:24		best 10:18,19
actions 72:23	aftermath 32:1	Americans 62:7	appointed 87:14	associated 33:16		11:5 16:9
activities 24:22	afternoon 54:6	amount 14:13,15	87:20	assuaging 48:20		20:18 27:14
ad 68:17	54:15,17,19	14:16 34:23	appointee 22:22	assumed 120:19		34:8 43:4
add 5:13	57:22 120:3	36:12 41:21	87:14	assumes 22:2		best-selling 11:2
added 45:3	age 11:18 13:3	61:13 71:11	appointees 99:5	98:5		better 80:6,7,8,9
address 3:24	14:3 39:22	105:24	99:7	assurance 66:11		87:2 90:22
	agenda 4:22,22	analysis 21:15	appointments	assurances 66:13		100:3 108:10

108:25	24:14	budget 54:8,12	65:20 66:25	97:10	93:3,9 101:11	commission
beyond 15:12	brief 86:16 92:1	54:13	68:6	changed 24:7	103:1 109:24	28:13 30:13,15
20:20	94:13	build 36:14	campaigned	87:1 97:4,5	114:6 121:24	33:9 40:19
bias 10:21	briefed 94:11	39:15 46:22	35:6	98:1	123:9	108:10 115:8
bid 3:15 38:9	briefing 86:15	building 40:5	campaigns 21:11	changes 5:24	cleared 64:5	115:10 116:23
big 47:12 68:19	88:17 93:6	51:17	21:13	23:5,6 39:9	clearly 13:20	116:25
108:18,20	95:5 99:22	built 47:23 95:7	Campbell 70:24	changing 34:2	51:10 61:18	Commissioner
117:2	briefings 85:11	bundle 42:11	84:19 85:3	channels 87:25	69:20,21 90:19	73:16 82:1
bigger 42:18	88:6,9 92:22	74:8 119:10,12	cannabis 71:20	character 19:23	108:8	Commissioner's
105:10	97:6,17 99:19	119:14	72:3,5	characterisation	Clegg 107:11	72:12
biggest 17:11	bring 27:8 87:5	Bush 45:2	CAPLAN 8:15	46:17	close 48:11 69:25	commit 5:4
bill 84:9	115:3	business 14:24	care 17:18,21	charge 69:2 74:1	100:6	commitment
billion 17:4	bringing 103:23	98:10 100:20	18:4,13 19:3	charity 34:23	closed 50:18,23	21:21
birthday 34:15	Brink 92:5,8	businessman	65:21 68:16	35:7	closer 45:11 47:7	committed 40:15
34:16 35:5	Britain 11:25	46:21	69:19	check 39:16	48:1	committee 105:1
bit 48:5 73:4	20:3 23:24	buy 38:3	cared 68:14	checked 65:6	coalition 51:17	105:21,25
blagging 39:17	24:2 49:22	buying 40:23	career 87:22	Chequers 34:15	code 16:1 28:13	106:8
41:8	50:3,7 52:2,5		91:8	44:11	72:25 77:25	common 47:17
Blair 1:14 7:20	68:22 79:25	C	careful 44:17	chief 17:4 22:7	78:10 79:9	70:9
21:10 47:8	80:19	c 2:8	77:4 116:14	64:15	coeur 9:21	Commons 11:17
83:9 85:24	British 10:8	Cabinet 43:18	carefully 106:21	child 28:15 29:5	coin 2:24	100:14 105:4
86:14,17	18:21 71:4	89:11,24 90:6	107:22	70:13,13	coincidence	communicate
101:15 102:22	80:18 92:12	call 5:20 8:21	carried 105:15	children 26:18	49:20	120:24
Blairite 88:20	93:25 98:10	10:7 39:25	carved 84:10	27:8 32:12	collapsed 111:1	communicated
Blair's 20:8 86:3	broadcast 28:15	44:4 55:7,16	case 7:10 13:9	33:11,17,20,23	colleague 71:9	84:1 103:9,11
86:9 104:5	29:8 30:23	56:1,2,9,13,15	25:11 27:25	34:10 103:25	93:8	103:14
blamed 95:1	31:7,12 110:1	56:16,21 57:2	33:9 63:22	104:16	colleagues 10:24	communicating
blessing 93:15	broadcaster	57:6 58:1,4,7	64:23 68:8	children's 32:6	collective 62:8	65:15 114:25
bloggers 19:19	110:17	58:10 60:18,19	77:15 79:12,15	child's 28:14	colour 87:19	communication
Bloody 61:23	broadcasting	60:23,25 61:1	83:3 89:4	29:6 30:22	coloured 80:1	58:20 60:11
blow 112:23	15:12 110:15	61:3,11 62:13	92:16 102:14	choice 30:21,24	column 20:21	88:10 98:20
blue 67:11	111:16 114:4	62:21 63:8,12	105:17,18	31:1 53:7	come 1:16 8:17	communications
board 28:2	broke 25:24	63:15,17,20	117:4,13 122:4	chosen 7:7,14	11:23 25:22	22:8,23 85:5,8
115:20	Broken 20:3	64:6,8,11,12	cases 7:3,9,13	26:15 110:6	32:13 41:16	85:15 87:14,16
boards 112:25	24:2 52:2	64:17,22 65:7	8:9 14:1 40:10	church 45:21	45:9 47:14	87:21 88:7
body 105:15	Brooks 32:18	90:7 98:3	casinos 71:19	circumstances	51:13 54:2	99:2,9
bond 47:18	34:14,16 35:12	99:14 104:12	casts 42:7	11:8 15:18	57:25 64:17	companies 11:14
bonus 51:13	35:23 38:25	117:4 118:4	cause 21:13 27:1	16:21 28:14	76:16 82:10	company 12:20
book 52:11 88:15	39:3 62:20	119:22,24	49:15	29:10 65:2	84:9 85:22	37:17 38:7
92:20	64:12 85:23	120:15,16,17	caused 35:23	66:8 73:8 92:3	98:5 109:14	compartments
bore 71:24 78:7	102:1	120:19,24	58:5	116:21,24	122:10	16:4
81:22	brought 73:18	121:18,19,21	causing 72:2	citizen 9:16	comes 51:12 66:9	competing 10:5
born 11:13	102:3 113:21	121:22,24	celebrities 33:21	14:20 19:16	72:20	competition
103:23	Brown 8:11,22	122:1,2,2,7,11	cenotaph 18:3	citizens 113:17	comfort 61:15	95:15,17
borne 4:11	8:24 9:1,2,7,12	122:14,16,18	61:4	civil 22:8 49:4	coming 28:18	100:23
boss 88:18	21:15 25:19	122:18,21,21	cent 25:9 35:4	85:5,7,7,15	42:24 65:8	competitive
bottom 9:13	26:5,25 29:9	123:5,8,10,11	century 19:13	87:4,8,10,15	92:22 119:1,3	100:19
81:24 94:4	32:14 38:24	123:11,15,18	108:18,19	87:22 88:7,14	commencing	compiled 55:14
bought 40:25	39:13 42:21	called 6:12 14:13	certain 73:12	91:8,11 96:4	6:22	complain 60:5
41:5	45:6 55:1,7	20:3 21:25	95:8 101:1	98:1 99:3,6	comment 15:24	complained 27:4
bound 4:6	56:8 57:10	41:8 60:19	certainly 23:15	100:2,4,8	16:3 21:16	52:16,19,24
boundaries 3:10	59:6,14 65:13	76:3 92:4	76:24 86:4	civilised 67:8	71:2 86:7	complaint 9:21
bow 18:3	68:14 74:22	99:19 104:17	90:17 111:12	claim 32:3,8	109:18	12:17 32:25
bowing 18:10	75:6,10 81:17	calling 56:23,24	111:14 117:11	claimed 2:22	commentators	108:7,10
61:4	85:25 95:6	56:25 104:5	cetera 39:17	27:11 61:9	53:9	complaints
branded 80:15	104:17 107:13	calls 42:17 45:8	challenge 3:5,8	claiming 42:2	commented	12:19 28:13
breach 40:9	115:25 117:20	55:12,19,21,24	chance 10:9 16:7	122:22	112:16	30:13,15 33:8
78:10	117:21 118:3,5	55:25 56:4	30:8 46:5	class 96:22 97:1	comments 6:16	40:18 67:17
breached 34:5	118:8,15,19	57:20 60:7	123:8	clause 16:1 75:23	9:12 26:5	72:25 77:23
breaches 39:14	119:6 120:11	calm 65:17	chancellor 40:8	clear 16:4 24:10	63:24 93:17	108:11,25
77:9	121:3,6 122:24	calmer 66:22	71:1 72:14	26:2,25 28:3	122:16	112:6 115:5,8
break 55:2,5	123:19,21	cameras 99:23	92:2	28:13 37:3	commercial 24:9	115:10 116:23
breakfast 42:23	BSkyB 3:15 37:2	campaign 10:16	change 13:8	39:6 47:7	24:21 26:1	116:25
breaking 41:19	38:3	23:24 24:2	21:24 38:3,4,5	59:14 60:21	37:12,16 47:5	complete 54:4
break-in 40:9	Buckingham	35:1,2,6 52:2,2	38:6 51:3	80:20 82:14	70:21 108:17	completely 23:18
breathtaking	87:21	52:3 63:11,14	53:12 90:25	86:25 89:9	114:3	63:6 99:24

113:11 complex 16:20 16:25 complicit 31:22 compromise 84:10 computer 39:16 concept 113:22 concern 75:6 107:8 concerned 2:12 4:4 35:9 37:9 37:10 51:21 101:22 concerning 1:6 concerns 2:5 5:25 36:5 82:2 107:6 conclude 5:19 21:10 96:12 concluded 5:10 21:10 61:25 conclusion 18:6 96:13 conclusions 6:19 93:4 condition 27:17 27:21 29:17 30:2,22,22 31:19 conduct 2:2,8 88:6 96:21 conducts 1:11 Cone 42:24 conference 23:23 54:6,7,13 74:24 confidential 8:5 8:9 confined 3:25 confirm 79:19 122:3 conflate 17:22 19:8 20:21 conflated 13:22 20:13 conflation 12:1 15:24 20:4 Confusingly 81:17 cons 106:13 conscience 45:22 116:19 conscious 79:8 consensus 36:15 97:14 consent 32:19,20 32:23 consequence 2:22 112:20 consequences 3:25 5:8 Conservative 19:6 24:3 25:16,25 26:3 38:13 51:12	60:2 62:14 71:17 121:15 122:6 123:6 Conservatives 52:9 60:6 consider 6:15 78:19 115:18 considerably 105:7 consideration 106:22 considered 5:9 107:22 considering 6:5 72:16 conspired 85:25 constitution 80:18 95:21 consult 107:3,4 consultation 73:24 82:1 97:11 consulted 44:23 78:23 consulting 74:18 contact 60:10 63:3 contacted 29:18 contacting 60:4 contacts 1:25 content 12:6 109:10 110:2 context 104:21 continents 46:23 continue 10:14 27:10 29:1 113:19 continued 30:6 continuing 38:24 63:23 65:9 contrary 37:21 contribute 69:5 contribution 61:14 control 69:1 controversial 16:13 80:2 convenient 8:18 54:25 conventional 72:4 87:15 conversation 39:3,4 56:6 59:15,20,23,25 60:1 61:18,20 62:16 63:4 65:3,10,11 66:7,15 67:24 79:17 83:24 89:6 90:14 92:19,24,25 101:17 104:11 107:10 122:8 122:25 123:3,4 conversations 67:7 84:2,6,12	86:5 90:13,21 90:23 convicted 79:3 convinced 85:24 92:5 core 31:23 32:14 118:20,24 122:10 correct 2:18 27:14 29:15 33:2 34:17 42:3 47:18 53:4,11 77:13 83:7 85:19 88:21 89:12 94:14 102:23 104:24 correction 45:1 correctly 38:25 121:16 correspondence 8:2,4,4 58:16 67:11 correspondents 18:22 corruption 41:22 113:8 cost 14:18,20 38:23 110:17 111:16 costs 1:7 Coulson 22:23 council 12:2 77:23 87:13 counsel 118:21 countries 20:7 33:22 69:5 112:25 country 10:19 11:2 16:16,21 17:11 19:25 21:4 36:6,8,15 39:9 40:17 51:16 61:14,16 80:15 97:7 108:16 111:21 114:14 couple 45:3 course 6:1 11:12 12:2 19:9,15 19:21 22:23 28:22 29:19 37:10 38:3 45:5 46:9 50:24 54:16 62:24 64:14 65:1 69:25 71:6 75:24 76:23 78:5,13 79:1 90:14 93:25 94:8,9 97:15 100:1 101:4 103:2 110:9,15 120:18 courteous 67:8	courtesy 10:8 courting 48:20 cover 57:9 coverage 13:22 14:6 15:14 16:13,17 17:19 25:1 26:19 covered 33:17 34:10 59:12 create 13:8 creation 110:7 cri 9:20 crime 40:14 77:20 78:21 criminal 73:2 77:9 78:14 84:8 crisis 20:2 36:8 36:17,18 42:18 68:20 92:12,14 93:22,24,25 criteria 5:3 6:10 criticised 38:19 68:9 criticising 36:19 criticism 3:3 7:16 cross 4:2 36:23 crossed 47:8 cross-examina... 79:18 cross-media 2:6 cross-party 1:10 culpable 102:9 cultural 13:7 culture 1:24 3:5 5:7 50:18 51:5 96:18,22 97:1 98:4 104:25 105:21 currency 49:21 current 5:15 22:21 custodial 73:25 74:2 76:15,24 82:6 Customs 91:9 cut 24:20 25:8 35:1 cutting 35:3 cuttings 11:11 cystic 27:13	61:25 Damian 89:8 Dan 42:24 danger 19:15 25:19 100:4,7 100:25 dark 10:14 Darling 92:2,20 93:7 Darling's 92:4 data 14:13 72:11 73:16 75:11 76:1 77:4,5,11 79:7 81:2 date 60:22 74:25 123:11 dated 9:3 94:8 daughter 26:16 31:14 33:6 Davies 6:24 7:1 8:2 118:4,7,14 119:5,6 123:19 day 1:16 11:1 21:9 44:19 58:8,14 69:17 76:25 97:18,18 119:17,19,20 119:21 120:3 121:10 days 14:6 20:9 21:19 30:1,1,1 day-to-day 99:11 de 9:21 deal 5:21 12:16 15:6,20 17:1 25:5 33:8 34:8 43:8 44:7 53:17,25 68:21 98:6 99:10 112:3 113:18 115:4 117:1,1 118:10 122:13 dealing 14:1 16:20 63:25 66:21,22 108:6 108:11,24 112:7 dealings 37:18 38:25 48:14,15 98:6 deals 85:3 111:12,14 112:6 dealt 2:6 29:3 38:6 68:25 85:9 110:3,5 deaths 35:2 debate 13:17 15:13 17:7,9 79:25 111:24 112:1 114:1 115:22 123:15 debates 85:1 debating 73:15 deceased 18:15 61:8	deceive 19:14 deceiving 40:20 December 58:22 59:11 deception 73:4 decide 27:21 decided 17:14 24:8 25:25 58:9 60:1,6 65:9 83:10 decides 18:11 deciding 52:8 decision 21:20 29:20 44:23 54:20 77:2 105:22 121:14 121:17 decisions 3:8 16:15,25 decision-making 3:13 declare 59:17 120:12 declines 13:2 118:23 declining 13:3 decreed 117:8 deep 75:6 deeply 68:16 defamation 102:14 defence 17:4,5 40:13 72:23 73:7,14,21 74:14,20 75:21 76:5,18,23 77:5,10,16,19 78:9,22 79:2 79:21 81:2 97:9 105:9 defenceless 10:3 defences 73:1 defend 10:2,20 11:6 12:8 20:17 38:14 76:7 113:5 defended 45:21 defending 95:14 95:15 definitely 50:16 93:5 definition 85:19 delay 6:22 delayed 1:3 9:9 deliberate 56:19 delicate 62:11 deliver 104:13 delivering 110:17 demand 109:11 demanding 23:25 24:1 democracy 3:13 21:1 democratic 2:20 demonise 19:11	demonstrated 1:18 deny 32:20 departing 89:11 departments 95:16,18 dependent 52:20 deprive 113:23 deprived 113:18 descend 17:23 described 69:24 95:7 describes 46:16 describing 88:15 description 70:2 deserves 47:23 designed 3:2 21:13 desire 40:1 desiring 31:23 desist 104:8 despite 94:20 110:3 116:9 detail 6:7 7:17 50:9 72:18 81:23 94:22 103:4 details 48:13 detention 80:4 deter 108:13 determined 96:2 deterrent 82:23 dethrone 101:15 detract 47:22 developed 88:17 109:23 developing 14:21 100:2 108:15 110:25 development 15:15 87:3 112:24,24 113:22 diagnosis 27:24 dictates 51:16 died 31:14 33:7 64:23 difference 19:22 different 1:16,17 30:14 37:9 53:23 62:16 87:19 90:8 95:16 100:23 101:7 differentiate 107:25 differently 20:6 difficult 7:17 16:15,25 17:16 18:20 26:14 36:16 62:6 65:16,17 73:4 76:20 111:3 112:22 117:22 120:4 difficulties 70:12
--	--	--	--	---	--	--

difficulty 49:23 113:19	dog 88:16 dogs 95:8	economy 92:12 Ed 71:9 91:1	empire 46:22 47:23 70:20	events 38:8,20 43:6,7 45:15	exercised 11:22 42:5,7	fact 5:18 7:20 12:1 13:22
dilemma 100:10	doing 5:11 6:14	Edinburgh 13:13 24:13	employment 111:7	50:19 86:6 102:6	exercises 11:5	15:14 17:8,22
diminishing 114:22	13:23 17:17	editor 11:1 13:13	enact 87:11	eventually 23:6 64:13	exhibit 42:9 44:1	19:8,20 20:4
dinner 37:2,3	21:8 22:8	30:4,10 41:15	encourage 6:15	everybody 12:12	55:10 58:4,24	20:13,21 21:16
44:11,20 45:1	48:5,25 62:4	42:25 54:5,15	13:24 111:19	33:24,25 79:3	exhibited 7:10	27:18 34:24
74:5,11 75:5	74:17 83:13	54:16,21 62:20	112:9	93:1	exhibiting 7:15	44:16 50:9
81:5 83:15	87:9 89:22	64:14	encouraged 51:5	evidence 1:14	exhibits 44:1	62:16 65:22
direction 100:9	109:4 112:2	editorial 12:6	encouraging 115:16	5:5,15,19 7:6	exist 23:17	72:6 79:2
directly 16:2	113:10 114:17	16:6,7 20:20	ended 62:16 63:4	7:18 8:11 9:5	existing 83:16	80:17 91:4,5
31:20 52:18,23	114:20 117:25	114:11	65:10	21:19 24:18	expect 22:18	94:20
52:23,24 56:9	122:13	editorialise 12:6	enforced 10:7	27:5 32:5 34:4	39:20 88:12	facto 32:4
60:5,6 72:15	domain 27:9	20:20	enforcing 12:16	35:19 38:16	expected 12:19	facts 18:25 21:12
79:3	dominance 21:25	editorialising 16:6 17:18	engage 36:4,20	39:18 40:2	30:15 34:22	26:10 22 62:5
Director 78:18	door 114:11	53:22	57:14	41:17 44:8	44:25 53:5	66:3
disagree 67:11	doubt 6:19 9:23	editorials 19:7	engaged 29:18	54:1 55:9 58:3	97:4	failed 18:3 19:25
70:9 90:2	39:21 42:7	101:24 103:3	34:24 35:8	59:25 60:16	expects 99:8	36:20,20 88:2
disagreed 67:5	57:3 89:15	editors 2:25 33:9	engineering 41:9	63:20 64:6	expeditions 39:25 40:3	42:15 52:22
70:4	90:4 94:24	33:14 42:14	enhance 15:7	74:3 83:10,14	experience 26:6	failure 3:23
disagreement 19:1 75:14	doubtful 49:22	54:8,9 74:23	enormous 71:11	83:24 84:7	31:13 33:5	21:15 31:8
92:17	doubtless 4:11	77:24 79:9	79:4	86:13 91:13	expert 18:17	109:25 110:3
discern 3:11	Douglas 91:1	117:17	enquire 1:24	94:8,9 101:11	experts 27:23	114:8
discipline 12:23	Dowler 9:22	editor's 121:17	ensure 2:17 3:4	104:12 105:20	explain 36:3,14	faintly 46:3
disclosed 103:13	112:4	education 49:2	4:15	106:15 108:9	42:15 61:13	fair 3:12 26:23
discomfort 21:13	Dowlers 12:8,18	educational 110:12	entered 11:15	109:19 112:17	64:25 86:25	34:3 44:24
116:9	Downing 53:16	effect 3:2 32:22	39:16	113:21 115:18	explained 3:14	46:17 53:12
discourage 112:9	55:17,18,22	33:22 59:19	entering 70:19	118:8 119:15	63:6 83:9,20	70:1 71:2
discourteous 61:6	56:12,21 57:1	69:20 110:12	entire 4:23	120:11 121:4	explicit 30:19	79:16 106:4
discretion 87:23	57:7,16 65:3	120:13	entirely 4:6,9,11	123:1,10	31:1,3,10 32:2	117:18
discuss 66:14	87:12 122:12	effective 6:11	63:7 65:5	evidential 95:9	32:8 35:20	fait 30:12,17
103:21 104:3	draft 5:3 6:10,12	67:12 74:21	67:12 74:21	evil 17:25 19:24	86:19	31:15
106:25 107:6	dramatic 93:17	78:6,13 104:12	104:14	72:1	explore 12:3	fall 16:4 72:15
discussed 48:14	draw 39:19 47:3	effects 72:4	entirety 99:6	ex 32:4	exponentially 14:15,17	falling 18:12
72:21 74:9	drawn 18:7	effort 4:18 62:1	entitled 38:10	exactly 7:11	exposed 73:5	21:4
discussing 20:24	drinking 71:21	62:9 65:19	46:14 118:24	20:12,19 56:14	exposing 21:12	familiar 119:9
discussion 79:19	drugs 72:4	67:6,12,16,18	envy 117:25	88:1	73:2,23	family 9:22,22
122:8	dubious 49:22	68:10 69:5,17	equally 1:10 2:17	examination 26:23 106:2	express 76:9	12:9,12,12,24
dishonest 68:3	due 45:5 62:19	69:18	4:11 67:17	example 3:22	86:23	27:1 67:9
dishonouring 18:13	duty 10:13 36:3	efforts 48:24	equanimity 54:4	7:20 10:15	expressed 20:10	103:24 104:14
disputed 118:4	36:9,14 38:20	either 2:14 7:10	equipment 96:1	16:10,18 18:4	20:16 35:14	112:4
disrespected 61:4	42:13,15	32:25 40:9	essential 4:2	18:12 20:2	36:5 52:1	famous 58:25
distaste 49:15	<b>E</b>	56:9 64:3	101:4	27:3 40:22	107:8	far 4:4 12:21
distinct 95:23	earlier 20:16	79:23 85:11	established 1:8	51:4 80:3	expressing 5:10	35:9 53:22
distinction 94:1	23:5 50:21	90:10 94:12	1:12	examples 16:12	expressly 23:15	97:6 101:21
108:3	51:5 58:7	98:24 100:20	establishing 26:10	20:4	58:7	108:14
distinctly 75:19	59:11 60:4	107:1	et 39:17	excellent 74:16	extended 105:14	fast-track 91:11
79:17	90:20 102:6	elaborate 9:13	ethical 70:6	115:5	extent 2:25 3:16	father 27:12
distinguish	early 11:12	107:24	ethics 1:25 3:6	exceptional 28:14	8:10 34:14	30:20
38:21 47:1	19:13 22:18	elected 106:24	5:7 6:13 96:18	excessive 21:25	66:15 105:5	favour 62:2
distort 19:20	23:2 86:1	44:8 66:25	euro 46:6 47:14	72:1	extra 67:16	73:21 110:9
distorted 61:23	easily 46:25	70:16 97:16	49:17,24 50:1	Exchequer 72:15	110:10	favourable 37:20
distortion 65:22	50:17	107:1	50:3,6,10 71:2	92:2	extract 79:24	64:4
distress 27:1	East 16:18	element 51:17	71:5,8,12,14	Excise 91:10	81:20 92:4,9	favoured 116:10
dividing 37:4	easy 19:15	66:12 101:4	Europe 10:24	excluded 97:23	extracts 107:17	112:4
71:4	117:22	else's 80:13	46:24 49:18	excluding 91:3	extraordinary 68:21	feature 78:17
divisive 71:13	economic 20:2	eludes 51:6	50:4,10 62:8	exclusive 23:11	extremely 1:9	fee 15:10,10
doctor 28:11	36:8,17,18	email 57:15 58:5	European 23:25	97:6 100:21,21	32:24	24:20 25:8
document 43:11	42:18 68:20	58:14,22 60:9	46:5 52:1	exclusivity 51:1	<b>F</b>	37:10 109:13
documentation 90:12	71:9 93:22,24	93:25	62:10	97:22	face 116:24	109:24 110:7,8
documents 82:12	economics 50:6	emailing 57:14	evening 44:12	executive 64:15	faced 36:8	49:9 68:23
	economist 110:10	emails 90:17	58:6	exercise 4:21	113:14	69:17 98:7
		embarrass 40:1	event 54:2	10:20 13:20	facing 75:7	feeling 73:18
		empathy 18:18				103:14
		emphasise 115:7				feelings 102:1

fees 109:14	focusing 106:20	fundamental	giving 5:5 16:9	gradually 105:6	87:7 95:1	100:19
fell 18:8	fold 17:3	81:16	30:18 94:8	grandfather	113:19 114:5	hinted 62:22
felt 33:14 62:5	follow 58:9	funnily 13:12	95:1 100:16	45:19	happened 7:5	Hinton 43:2 74:5
65:23 67:13	96:14	further 2:15 5:21	101:21	grandson 45:18	16:10 17:10	75:4 79:14
69:21 73:6	followed 52:13	30:1 60:11	global 36:17	grated 52:13	25:8 26:21	83:22
79:25 80:5,14	59:9 96:8	61:1 66:6 79:1	68:20 92:14	grateful 27:7	27:12 28:23,25	history 3:10
80:14 83:18,19	following 19:15	99:13 105:25	93:23	120:8	33:4 34:20	hold 10:10 34:5
98:12,21	46:15 73:24	106:18 108:4	go 15:12 25:5,6	gratitude 35:14	35:10,18 37:13	41:25 72:3,7,7
100:22	follow-up 58:15	110:16	26:7 30:5 32:5	grave 36:8	37:23 40:10	73:10 76:22
feral 20:8 21:17	104:3	fusion 21:16	32:7 52:8	gravitates 14:25	49:25 51:24	holder 15:14
23:17	force 86:1,8,9	fuss 34:9	55:17 56:11	great 10:16,23	57:3 59:20	holding 112:25
ferment 13:7	forces 17:5	future 2:4,8 6:1	57:1,19 88:3	22:5 25:5	60:1,17,23	Home 105:13
fibrosis 27:13	forgive 112:2	6:18 25:13	88:14 89:5,21	39:23 43:8	62:22 63:21	106:2
fiction 28:19	forgiving 34:18	30:8 50:3	89:25 90:9,19	49:23 50:9	64:9 68:5 86:7	hominem 68:17
fiercely 19:18	35:17	51:16 52:5	91:7,24 92:15	53:16,25 74:17	88:2 89:22	honest 11:20
Fife 28:1,3	forgotten 70:13	97:12 107:13	93:14 96:15	98:5 110:10,11	90:16,18 93:19	17:7,24 19:1
files 14:12 39:17	form 116:13	107:19 108:22	99:1 103:3	117:25 122:13	101:20,22	22:16 23:8
final 77:1	formal 9:5 84:5	109:12 111:6,9	108:5 114:14	greater 23:3	102:10,13	24:8 30:6
Finally 60:21	formally 39:19	111:22 112:13	115:10 119:10	42:17 99:14	113:14 121:23	51:25 68:2
finance 108:20	former 1:13 4:13		goes 18:18 49:25	111:23 116:4	122:5,15,23	70:14
109:25 111:5	forth 65:6 93:2	<b>G</b>	79:3	greatest 11:3	123:12,14	honesty 28:24
financed 111:21	96:11	gain 38:7	going 9:13 14:14	12:9 13:16	happening 14:22	honourable 8:22
financial 114:7	forthcoming	gained 60:2	14:16 15:2,3,3	greatly 80:19	18:23 19:1	97:13
financing 111:10	66:10	gallery 99:21	25:22 29:17,20	greeted 66:5	22:12 23:19	hope 3:20 26:17
find 18:2 19:4	forward 6:1,2,4	gambling 72:1	30:7 39:12,21	grief 12:9	37:8 54:22	27:2 34:11
20:6 28:17	51:19 66:2	gay 49:4	39:22 41:12	ground 18:24	58:2,13 63:7	50:16 77:14
48:9 84:14	84:14	GB1 58:4	44:21 46:24	62:9,11 70:9	63:20 69:19	86:11,13
87:7 97:14	fostered 50:14	GB3 42:9	51:19 53:19	grounded 1:22	101:20 107:9	115:17
104:10 111:9	found 15:9 33:4	GB3B 45:8 55:10	54:2 56:17,21	group 22:17 23:1	happens 109:12	hostile 64:3
112:22 114:13	45:19 49:23	57:19	57:7 65:18	25:18 48:24	109:13	68:25 70:25
120:4 123:14	51:3 63:18	general 9:12	66:11,17 70:23	49:8,10 100:21	happy 119:3	hotel 56:10
finding 66:16	104:9 117:4	21:9 26:5 30:7	74:20 79:1	grow 33:20,23	120:21	hounded 28:10
111:2 114:15	four 29:6 121:21	32:11 66:24	88:13 101:2	guard 10:1	Harding 43:1	hours 54:21
finds 34:19 41:24	fourth 75:10	90:24 91:3	103:16 109:15	Guardian 43:1	harm 122:14	house 11:17
fine 9:10	four-month	95:24 96:15	111:4 119:1,25	92:10 93:22,24	Hayward 90:10	97:19 100:14
finer 112:7	30:21	97:16	good 8:19 13:1,4	guardians 10:1	head 18:10 22:23	103:20 105:4
finished 98:22	Fox 25:2	generally 48:10	13:24 15:7	guidance 82:1,15	56:18 85:4,7,8	huge 15:13 23:8
firmly 4:19	framed 13:21	genuine 111:18	16:11 34:13,19	89:1 97:25	85:15 87:10,14	23:23 24:2
first 4:8 9:14	France 46:7	genuinely 117:18	73:22 98:15,17	guidelines 12:3	87:16,20 88:7	35:10 36:12
11:9 12:1 13:9	Fred 94:25	Germany 46:7	108:14 109:1,8	77:23,24 98:23	88:14 99:2,8	41:21 42:16
18:5 23:22,23	free 20:17,18	getting 11:14	110:13 111:13	99:1 109:2	100:4,7	50:2,2 61:13
24:9 27:18	26:18 41:22	22:3,5 97:15	111:20 112:1,9	Gus 90:10 94:21	heading 7:21	69:17 71:3
32:13 40:12	47:24 113:22	98:18 110:12	112:10 115:1	104:21 105:19	headlines 61:23	72:18 111:24
41:5 42:21	116:19	111:16	Goodwin 94:25	106:4	health 28:1,2	hugely 71:13
55:10,14 60:12	freedom 9:23	gift 98:21	Gordon 8:22,24	guys 98:17	49:1 112:25	79:11
67:3,13 68:9	10:21 11:5,21	gist 38:16	9:2 75:6,10		healthy 21:1	Hunt 6:3
70:13 89:16	13:5 19:7 42:5	give 20:2,3 22:11	85:25	<b>H</b>	hear 5:5 8:11	
92:8 100:17	42:7 45:22	27:24 30:8,16	gossip 84:24	hacker 76:3	64:20 67:23	<b>I</b>
106:9 111:17	49:3 64:1	31:1 40:2,21	88:23 96:10,11	105:8	75:18 109:21	idea 18:19 32:8
121:18	76:10 80:7,8,9	40:22 43:20	government 2:8	hacking 63:14	heard 39:17	34:6 46:2,12
fishing 39:25	113:5	55:1 94:9	3:8 4:1 16:11	102:7,23 105:5	67:17	46:14 47:17
40:3	freedoms 9:15	108:21 109:22	22:10,21 23:14	half 21:3	hearing 1:15 6:2	49:21 76:22
fitting 3:12	9:19 10:4 75:8	given 7:5 8:7	24:4,18 25:4	hand 65:23	heart 49:25	82:10 116:12
five 121:20	76:6,13	17:6 23:11	34:22 39:5	118:13	50:25	116:17,19
fixed 56:5	friend 93:7	24:18 28:5	48:10,11 50:1	handful 7:13	heavy 116:10	ideas 5:11,12
flat 40:23,25	friends 34:14	29:13 31:6	50:14 58:20	handing 1:5 21:5	heed 91:17	6:18 80:17
41:4 47:19	friendship 4:11	32:4,20,23	71:7,17 72:9	hands 21:4 61:20	held 3:4 4:16	107:19 109:21
flavour 42:12	frightening	35:14 43:20,21	76:25 87:19	handwriting	102:9	identified 47:20
floated 44:7	75:11	52:19 60:19	89:7 93:1	18:17 58:25	help 6:19 10:25	identify 39:14
flood 14:10	front 20:22	62:17 66:9	95:13 101:13	handwritten	30:13,16 34:11	ignore 15:13
flooding 113:15	30:23 89:19	68:9 89:19	101:24 106:1	59:8,11 66:24	64:25 79:13	II's 93:10
flourish 109:17	90:8	93:21 96:8	106:16	67:1	109:8	illegible 59:1
flow 14:4 15:22	fulfilled 2:23	97:17 105:15	governments	happen 29:21	Henry 93:10	illustrate 16:9
113:17	full 7:18 9:1 43:3	113:21 118:9	4:21	31:2 39:22	hereditary 31:19	illustration
focus 2:10 5:16	81:22	122:6	government's	60:15,17 63:16	high 110:11	17:15
96:17	fully 4:16	gives 96:15	73:25 83:16	70:23 83:9	highly 28:4 39:8	imagine 14:7

31:25 imagined 105:11 imbalance 9:17 9:18 immediately 29:19 45:20 immigration 84:8 impact 3:24 5:15 29:22 impartiality 24:25 38:5 impeded 82:16 impersonating 41:7 impersonation 41:19 impinging 9:19 implement 74:19 implementation 75:22 implication 47:11 implicit 9:16 30:19 implied 86:23 importance 2:19 20:15 47:24 important 1:9,10 27:5 32:10 33:25 51:8,17 61:15 64:1,4 72:20 77:3 78:17 89:2 94:1 101:5 103:10,16 109:4 116:8,20 impossible 50:7 51:4 impression 23:18 66:10 imprimatur 122:6 improve 49:1 improved 109:7 inaction 23:13 incentivise 13:1 13:4 15:7 108:14,21 109:12 incident 34:7 35:18 91:6,24 92:16 93:20 94:23 incidentally 87:17 98:23 121:17 incidents 34:4 include 1:23 4:24 12:14 55:24 56:1,3,5 included 45:12 includes 100:1 including 1:25 2:7 37:14 48:21 70:24	106:2 109:12 incorrect 88:21 increase 14:14 14:17 increased 17:1,2 incredibly 16:15 35:3 independence 116:16 independent 46:9 113:23 117:15,15,16 117:17 independently 107:2 individual 40:20 46:25 47:2 68:10 71:23,25 73:5 76:9 82:19,24 116:19 individuals 9:25 108:7 indulge 85:18 industry 6:2 75:7 79:13 80:22 industry's 79:12 Inevitably 3:14 influence 37:25 38:1 44:22 influenced 13:19 44:16 46:2 47:12 inform 6:19 97:18 information 14:4 14:10,14,15,16 15:22 22:10,11 22:18 23:2 27:23 28:5,9 28:15,21 29:6 29:14 30:8 31:6,24 32:6,6 33:5,6,11 40:14 41:7 43:19,19,21 49:3 58:10 65:12 72:12 73:15 75:25 81:25 90:22 100:11,15,17 101:21 102:3 105:9,24 106:1 110:13,24 112:23 113:16 123:16 informed 88:8 informing 74:15 inherited 97:21 initial 115:23 initially 72:24 initiative 104:1 injurious 12:24 injustice 112:4 innocent 112:4 innovation 95:13	innuendo 88:23 96:10 inquiry 1:8,21 2:18 3:7 4:3 5:4,14 6:7,9 8:2 9:5,8 12:22 28:18 29:14 41:16 58:18 96:17 99:13 104:17 105:17 105:18 106:7 108:4 Inquiry's 7:10 8:4 insiders 23:1 97:22 insight 40:24 41:11 96:15 insist 30:6 insisted 85:2 insistence 87:8 instance 8:6 77:15 88:2 instances 40:21 73:12 instigation 85:12 instill 13:7 instinct 73:20 76:3 institutions 10:12 73:9 instruct 88:4 92:1 instructed 88:1 93:6 94:12 instructions 95:11 96:7 insulated 3:3 intact 22:24 integrate 96:3 integration 114:3 intended 3:19 5:20 intending 6:8 intense 1:18 intensify 101:3 intensifying 100:24 intentions 17:25 19:23 interactions 42:23 interest 1:19 2:21 4:20 6:13 29:7 36:24,25 37:12,12,15,21 38:15,22,22 39:2 40:13 41:18 45:22 72:23 73:1,7 73:13,21 74:14 74:20 75:21 76:4,18,23 77:5,10,16,19 78:1,15,16,20	79:8,21 81:1 interested 2:14 48:5 109:21 interesting 5:13 45:19 46:18 interests 3:25 18:21 24:9 26:2 37:16,21 41:22 47:5 70:21 88:19 interference 116:13 internal 26:7 43:10 107:21 110:22 international 24:8,24 26:2 28:18 37:7,19 37:22,24 39:8 48:16,21 50:15 59:18 60:8 63:11,15,23 64:3,4,15 68:23 75:4 101:14,24 102:8,16,19 103:1 119:7 120:12 122:4 122:13 123:9 International's 102:24 internet 13:3 14:3,11,14,19 15:1,11,15,16 15:19 19:16 24:21 25:12 31:5 100:1 101:2 110:21 111:15 112:13 114:16,25 interplay 3:22 interpret 54:1 interpretation 92:18 interview 11:3 44:9,15,17,19 44:22 92:9 93:21 94:2,3 inter-party 2:12 intimately 15:15 introduce 73:25 74:2 77:5 15:10 76:18 introduction 108:2,24 intrusion 27:4 40:11 41:19 invaded 12:11 invented 80:17 investigate 2:16 3:18 66:6 76:11 113:24 investigating 40:16 investigation	3:19 41:3 105:14 115:2 investigations 117:19 investigative 82:15,17 114:21 115:9 115:15 invited 89:7 involved 24:19 49:9 51:9,10 86:8,12 95:4 102:12 Iran 98:9 Iraq 36:7 Ireland 117:3 Irish 117:7 irrespective 35:17 irresponsibility 42:6 irritated 66:7 issue 3:21 12:22 13:3,17,19 15:19 17:24 18:20,25 19:2 19:21,22,22,23 19:23,24 20:1 20:13 21:7,16 21:17 25:16 26:17,20,20 28:12 35:10 40:16 50:2,5 51:9 55:7 57:1 64:1 70:7 71:13,16 72:18 74:9,10 75:10 78:2,8 80:6,14 82:7 84:16 89:8 92:7,10 94:6 98:23 99:3 102:23 103:16 105:10 106:5,20 107:6 108:6,20 109:3 109:6 111:12 111:14 112:3 115:4 issued 32:21 issues 2:16 5:16 5:23 6:15 10:9 12:16 17:16 24:25 25:15 37:5 38:13 42:16,18 44:22 47:13,15,17 48:16 49:4,5 66:14,21 68:19 69:8,10 71:24 72:16 76:20 79:9 85:9 106:25 109:15 112:21 117:2 itemised 24:17 items 19:17 ITV 37:6	<b>J</b> Jack 74:2,17 75:20 81:25 84:13 Jacqui 91:13 jail 79:4 James 9:2 24:12 37:25 43:13 52:4 64:22 110:4 120:22 121:16 January 6:4 43:13 Jay 8:17,21,25 9:1,12 25:21 29:9 54:25 55:7 66:23 79:11 81:17 83:1 101:7 115:25 117:20 118:21 120:9 jeopardised 4:3 Jeremy 90:10 job 11:15 22:8 34:21 35:10 53:18 74:17 87:9,18 117:25 118:1 John 94:7,13 95:5 join 47:13 50:3 116:22 117:13 joined 34:25 joining 50:8 112:1 journalism 12:4 13:2,11 14:20 14:23 15:4 19:16 21:12 82:16,17 108:16,20,22 109:7,17 110:1 110:8,11,22,22 111:6,8,21,25 112:11,15,17 113:16 114:9 114:21 115:3 115:16 journalist 29:15 78:14 112:12 114:16 journalists 3:1 4:8,10,13 13:16 78:21 109:8 111:6 113:24 judgment 13:21 17:9,25 64:7 72:20 77:1 112:10,11 115:11,13 judgments 13:19 78:3 117:19 judicial 104:17 105:18 July 1:8	June 1:1 20:9 33:1 34:15,17 45:2 94:8,18 junior 39:7 justice 1:5 6:25 8:1,14,16,19 8:23 9:7,11,25 26:25 27:7 55:1 66:4,19 77:3,8,13,17 77:25 78:4,6,9 78:12,25 81:14 81:20 82:14,21 84:8 99:16 109:18 112:14 112:20 113:3 113:20 115:19 117:7,21 118:2 118:6,12,15,19 123:20 justification 41:14,18 63:13 justify 39:24 <b>K</b> keen 2:12,17 72:10 78:25 82:16 keep 3:2 4:18 keeping 3:3 Kenneth 13:15 key 6:12 kids 33:23 kill 93:14 kind 29:2 35:17 70:11,12 kindly 107:17 knew 27:16,25 61:16 92:21 104:2 knighthood 94:10,24,25 knights 93:14 knock-down 41:1 know 2:16 7:25 26:11,12 27:19 28:12 32:16 33:19 34:19 41:25 44:10 48:8,13 54:7 56:14 57:5,13 57:24 67:20 68:11 71:3,18 72:3,25 76:5 78:22,25 80:2 83:23 86:14 88:22,24 90:16 92:24,25 94:16 94:19,23,23 96:9,9 97:3 98:7,17 101:23 101:25 102:15 102:15,25 105:3,5 106:23 107:16 109:4
---	--	---	---	---	---	---

114:1 116:1,23 117:25 118:11 118:18,25 119:3 121:7,7 122:1,3,9 knowing 121:6 knowledge 31:7 31:11 85:12,19 85:20 86:20 106:18 120:13 known 103:25 104:6 105:6 106:1 Kosovo 16:18,20 KRM 44:1 58:24	legislation 74:21 76:19 82:9 117:5,8 legitimate 82:15 82:17 Les 75:4 lesser 8:10 lessons 27:9 28:23 32:11,12 42:3 50:13 96:24 98:3 letter 18:14 28:1 57:15 58:15,20 61:5 63:5 64:18 66:23 67:2,22 68:12 94:7,21 104:4 104:18 106:4,9 107:2,3 letters 11:14 35:13 58:15,17 58:18 61:15 65:25 67:10 69:10,13 90:12 121:20 level 39:21 113:9 113:10 Leveson 1:5 6:25 8:1,14,16,19 8:23 9:7,11,25 26:25 27:7 55:1 66:4,19 77:3,8,13,17 77:25 78:4,6,9 78:12,25 81:14 81:20 82:14,21 99:16 109:18 112:14,20 113:3,20 115:19 117:7 117:21 118:2,6 118:12,15,19 123:20 Lewis 97:13 liberation 16:24 liberties 49:4 80:17 liberty 79:24 80:6,10,16,16 licence 15:10,10 19:14 24:20 25:8 37:10 109:13,23 110:7,8 licensing 72:2 life 11:15 12:25 40:5 121:11 light 113:7 120:4 limit 3:19 29:22 31:17 limited 43:1 line 36:21,22 37:4 47:3,3,8 56:5 89:19 90:8 102:11 lines 71:4 84:7	link 55:20 linked 14:12,13 list 42:9 43:14 45:8 55:11,15 55:22,23,24 listed 36:10 listen 66:5 listening 99:21 listing 24:23 little 39:10 61:14 67:17 live 115:22 lobby 22:1,24,25 50:25 51:1 97:4,12 99:19 99:22,25 lobbying 74:15 83:15 local 111:3 112:17,20,23 112:24,25,25 113:9,12,16,22 114:2,3,4,4,5 114:10,13 London 56:8 long 6:4 26:2 71:8 longer 64:14 8:1,14,16,19 80:3 119:25 look 3:9 6:2,4 10:9 15:5,6 26:21 34:20 40:4,21 42:9 48:25 55:10 63:2 66:9 67:22 68:1,5 68:19 69:10 70:18 71:3,23 75:17,24 76:17 79:20 81:8 84:24 95:12 101:23 102:8 105:3,11,15,20 105:20 107:13 108:13,25 109:6 111:12 112:8,14 looked 37:13 40:18 69:11 97:18,19 105:13 106:15 106:21 116:12 117:18 looking 40:13 50:11,11 77:22 78:7 96:21 looks 96:24 100:7 Lord 1:5 6:3,25 8:1,14,16,19 8:23 9:7,11,25 26:25 27:7 45:10 47:6 52:11 53:1 55:1 66:4,19 70:17 77:3,8	77:13,17,25 78:4,6,9,12,25 81:14,20 82:14 82:21 88:15,21 89:12 90:2 99:16 104:19 106:21 109:18 112:14,20 113:3,20 115:19 117:7 117:21 118:2,6 118:8,12,13,15 118:19 119:15 120:14,24 121:13 122:25 123:20 losing 52:16 62:6 loss 112:23 lost 94:24,25 98:20 lot 23:5 39:18 46:1 64:24 84:2 91:16 97:23 115:21 lots 54:12 84:25 luncheon 123:23 lying 40:20	M machinations 102:21 machine 95:13 MacTaggart 24:13 39:7 110:4 Mail 36:11 53:23 70:15,15,25 71:13,21 maintained 83:4 maintaining 28:19 major 33:10 94:7 94:13 95:5 majority 8:7 making 16:25 53:2 54:20 67:19 106:16 112:10,11 maladministra... 113:8 man 11:3 27:12 97:13 managed 65:14 108:19 management 67:5,12,15,18 68:10 69:16 100:11 mandate 21:22 83:8,11 Mandelson 45:10,15 47:6 53:1 88:21 90:4 118:8,13 119:15,21 120:14,24	121:13 122:25 123:3 Mandelson's 52:11 88:15 89:12 90:2 manifest 99:17 manifesto 21:21 21:23 manner 2:16 53:6 113:11 March 49:13 57:20 82:10 84:11 106:22 margin 109:20 marginal 110:17 mark 18:15 93:16,18 market 41:1 109:25 110:3 110:14 111:13 114:8 Marr 44:10,15 44:16,17,18 massive 14:4 15:23 34:23 match 74:22 material 91:18 maternal 35:2,2 35:3,6 matter 13:9,10 30:24 37:14 60:10 68:1 73:11 105:4 mattered 69:2,3 matters 8:12 10:7 17:24 103:21 maximum 16:17 McBride 85:10 86:15 88:3,16 89:8,14,18 90:5,7,11,15 90:24 91:2,8 91:17,22 94:12 94:16 95:25 McLellan 74:5 75:4 79:14 mean 47:13 79:2 84:3 85:13 86:25 88:22 92:16 94:23 103:25 111:3 113:13 means 12:14,25 13:4 70:10 75:3 84:21 113:18 118:15 meant 67:15 mechanism 61:18 mechanisms 15:5,7 meddlesome 93:12 media 2:5 5:21 9:16,19 10:11	10:18,20 14:8 14:25 15:1,17 19:4,19 20:6 21:21,23 22:19 25:13 26:16,19 28:24 34:3 36:4,20 37:9 37:20 38:5,7 39:9 40:11 42:8,10,14 45:25 46:22 47:15,23,25 48:20,24 49:6 49:8,10 50:15 52:5 68:25 70:8 73:12,21 76:1,8,10 86:8 86:16 92:15 96:16 97:14 98:6 100:1,20 100:23 103:19 105:1,16 109:10 medias 112:12 media's 80:12 medical 27:16,23 28:6,9,20 29:6 30:22,22 31:6 31:7,11 33:6 40:6 medium 36:4 meet 43:4 meeting 43:2,24 44:3 70:17 75:15,20 84:5 meetings 35:22 35:24 36:1,10 42:10,25 43:12 43:14 44:5,18 45:3 48:7,8 member 11:9 15:23 28:6 61:21 71:10 members 28:17 72:9 117:12 memo 106:12 memoirs 89:17 90:3 92:4 mention 13:5 54:19 64:12 97:12 mentioned 13:6 59:13 94:21 merely 3:21 102:17 merged 114:11 merited 67:13 message 4:14 22:3,5,9 65:15 87:24 98:18 102:5 Messrs 74:5 85:10 met 36:13 42:14 43:5 44:14 48:3	method 117:7 120:21 Metropolitan 106:6 Michael 74:16 75:21 84:12 middleman 27:15 28:7 Miliband 91:1 106:23 107:7 107:10 million 16:16 17:3 millions 110:18 111:17 mind 1:21 6:17 75:20 78:7 90:19 minded 29:11 mine 48:18 58:25 93:8 minimal 110:19 minimise 29:22 31:17 minimum 105:24 minister 1:13 10:22 16:14 23:20,22 24:5 33:12 36:3,7 45:18 51:25 61:21 68:3,4 68:20 72:19 74:17 75:5 83:19 84:13,13 88:5 93:7 95:14 100:5,6 102:20 115:25 120:20,23 ministers 37:14 91:20 95:18 97:17 minor 33:21 minority 71:7 misprints 18:16 61:6 mistake 11:20 81:16 89:21 104:8 mistaken 60:22 mistakes 12:24 17:8,24 27:10 misunderstand... 44:13 102:4 misunderstood 50:16 79:6 mix 19:20 Mm 120:2 mobile 56:4,10 57:12,17 122:11 model 14:24 111:1,11 modern 39:22 modify 83:16 module 4:5,8
--	---	---	--	--	---	---	---

5:19,25 6:2,13 moment 8:18 12:9 45:9 54:2 54:25 62:12 77:8 99:25 118:3 Monday 1:1 61:3 61:5 money 17:3 months 27:18 29:7 39:5 52:10,13 53:6 58:19 74:25 75:3 90:9 morning 9:9 31:23 morning's 8:21 mortality 35:2,3 35:6 mother 30:20 31:5 61:7 motion 33:12,13 motive 19:22 motives 42:8 Motorman 1:7 mouth 102:25 move 21:24 22:6 22:13 26:5 66:2 69:23 91:22 99:18 115:6 moved 22:7,16 22:21 37:24 91:5,6,23 115:23 moving 14:11 51:22 90:7 MP 11:11 Mugabe 94:10 94:24 Murdoch 25:18 25:24 34:25 35:4 39:7 43:13,15 44:11 44:14,20 45:10 45:17 46:4,13 46:16 47:12,17 47:18 48:3,12 48:15 52:4 55:8,12,17,21 56:7,11 57:23 58:6,21 59:15 59:20 60:8,14 60:22 62:3 64:7,18 65:25 66:9,23 67:3,4 67:7 69:9,14 69:23 70:11,20 75:4 110:4 118:5 119:24 120:11,21,25 121:2,4,18 122:2,9 123:13 123:17 Murdochs 43:10 Murdoch's	24:12 34:25 37:25 38:1 44:2 45:24 46:3,12 57:13 58:24 60:17 121:8,12 mythology 95:6  N name 9:1 18:12 39:16 94:21 119:6 named 94:13 nation 36:5 national 2:1 28:2 39:16 42:16 49:1 112:15 113:10 nature 38:4 65:7 95:17,19 96:9 near 93:16,18 97:16 necessarily 66:17 110:14 necessity 13:7 22:11 26:23 68:13 need 5:24 20:17 25:1 37:2 74:21 79:20 83:21 96:13 103:14 111:8 112:5,6,11,12 113:12 needed 49:5,6 68:24 97:20 105:11 107:4 needn't 112:14 needs 116:2 neither 47:7 network 110:17 neuter 24:15 neutered 24:22 neutering 25:7 never 16:21 20:14 26:15,15 27:8,13 28:22 31:25 32:9 36:23 37:5,15 41:17 52:16,17 52:17,18,22,23 52:23 56:23 59:23 60:4 64:8 67:4,20 67:24 83:8 88:13 95:4 116:8,10 122:15,16,22 123:15 new 11:11,15 14:20 15:20 52:3 57:23,25 82:3 87:3,18 89:19,20 91:22 91:23 95:13 100:1,14	101:21 102:3 104:23 106:19 111:9 117:3 119:14 121:15 news 14:6,7,8 15:1,14,24 16:3 24:8,24 24:25 25:2,2 26:2 28:18 37:7,9,19,22 37:24 39:8 48:16,21 50:15 53:10 54:3,3 59:18 60:8 63:11,15,23 64:3,4,15 69:15 75:4 100:19,22,24 101:14,24 102:8,16,19,24 103:1 119:6 120:12 122:4 122:13 123:9 newspaper 11:2 13:13 16:8 17:13 18:2,11 20:22 21:7 23:11 25:24 26:9 30:4,24 31:7 33:16 41:23 46:22 49:13 51:8,12 52:18 54:9 56:24 61:22 65:4 75:7 111:4 114:10 114:11 116:22 117:16 newspapers 2:1 12:5 14:24 18:24 33:10,14 40:3 53:14,17 53:23 68:17 71:5 100:25 109:10 110:25 112:15,22 113:23 114:4 newspaper's 26:12 NHS 28:6 nine 39:5 noise 34:9 nonsense 46:15 normally 45:15 note 21:2 24:11 39:13 noted 92:20 notes 35:13 89:6 noteworthy 83:1 notice 7:10 32:16 122:9 notices 7:7 novelties 110:10 November 27:4 32:19 35:24 57:21 58:6	59:9 61:2 64:9 64:13 74:24 121:19 122:1 122:21 123:5 number 10:23 16:12 17:2 35:12 39:14 50:24 57:12,13 73:16 75:7 79:4 81:18 84:18 87:1 88:5 89:24 98:2,25 107:8 numbering 26:7 43:10 107:21 numbers 17:10 17:11 57:17 114:12 nursery 33:18  O oath 32:18 63:22 obey 96:14 objection 98:11 98:14 objections 71:14 objective 21:11 observation 47:10 52:14 53:2,13 observe 15:18 observed 89:4,5 obsessed 53:10 53:14 obsession 53:11 obtained 28:20 28:22 obvious 68:14 83:12 obviously 9:8 45:16 53:18 64:5 81:5 87:6 97:8 100:24 104:21 occasion 57:23 74:9 96:5,6 103:22 occasions 11:7 24:23 occupation 16:23,24 October 43:24 44:3,4,5,6,10 44:12 81:4 89:7 90:1 Ofcom 24:16,22 25:7 37:8 38:4 offence 78:14 offences 77:6 offensive 34:8 53:7 offered 66:13 office 29:15 30:4 42:13 43:18 57:6 89:11,24 90:6 98:22	106:10 officers 4:7 offices 99:5 official 99:2 off-the-record 88:6 Oh 91:15 118:3 Okay 20:8 21:15 39:12 45:7 85:22 107:13 old 11:19 30:21 119:14 once 98:8 104:9 110:16 111:17 112:21 one-term 68:3 Onora 19:12 onside 4:18 onwards 87:3 open 3:12 6:17 38:8 40:25 77:18 78:13 97:6,17 99:11 99:24 openly 50:20 openness 23:3 51:4 97:20 99:14 100:12 101:3 116:4 operate 85:14 95:22 operated 85:13 operation 1:6 22:24 95:5 opinion 5:11 12:1 13:22 17:16,23 19:9 19:20 20:4,13 20:21,23 65:22 69:20 opinions 71:25 opportunity 66:6 113:24 118:10 opposite 19:9 93:19 opposition 51:11 88:19 106:24 option 76:15 options 57:9 order 3:11 16:22 25:9 86:1 87:12 93:14 ordinary 14:11 14:23 15:1,23 16:6 33:23 61:21 organisation 73:5 organise 100:11 organised 43:6,7 original 50:17 73:25 89:22 91:5,22 originally 22:22 43:20 58:13 91:11	originated 80:19 ought 12:3 76:4 97:24 111:11 118:9 outlets 100:24 outlined 6:3 output 114:22 outside 12:6 16:6 73:9 outsiders 97:23 overlaborating 77:14 overnight 14:19 overpoliticised 100:7 override 37:12 overrule 73:19 owing 71:1 84:7 owners 42:14 ownership 2:6 o'clock 54:18 O'Donnell 90:10 94:21 104:19 105:19 106:21 O'Neill 19:12  P page 9:14,14 20:22 23:12,12 26:6,6 30:23 39:12,13 42:22 42:22 43:11 55:11 58:5 59:7 70:1 81:11,18 83:2 88:15 92:20 101:10,11 107:18,21 pages 7:23 paid 4:20 Palace 87:21 paper 42:3 paragraph 81:8 84:20 85:23 paranoid 95:8 parent 28:10,11 30:25 31:9 parents 31:8 Parliament 3:17 11:9 22:14,15 23:9 71:11 Parliamentary 50:20 part 3:16 12:20 19:7 23:13 27:5 37:3 38:24 45:24 48:11 49:6 50:14 52:22 65:20 71:1 83:11 95:12 99:25 108:10 114:14 partial 61:17 participant 32:14	participants 31:23 86:6 101:5 118:20 118:24 122:10 particular 7:20 7:22 12:5 17:13 20:1 26:12 34:13 35:18 48:21 49:8,10 50:15 51:9 54:2 100:9 113:19 particularly 4:22 4:25 12:13 24:12 29:6 36:2 parties 1:17 62:14 partner 48:9 partnerships 49:4 parts 42:17 party 3:10 4:1,2 5:5 23:23 24:3 25:17 26:1,4 34:15,16 38:13 51:23 52:25 60:2 64:8 70:16,19 87:6 120:1 121:15 122:6 123:7 passed 41:10 patched 120:17 patently 41:25 patterns 3:11 Paul 42:22 69:23 70:18 pay 15:3 paying 5:17 payment 28:25 PCC 6:6 82:2 peace-maker 16:19 penalties 112:7 pension 11:14 people 10:8 14:16 16:16,19 19:17 21:14 22:17 27:16,16 27:25 32:1,7 34:18,21 35:17 36:12,19 40:13 42:20 44:14 49:24 50:2,19 50:24 51:1,1 52:20 57:5 62:2 63:10,23 64:3,10 69:6 69:13 74:18 76:7 80:4,16 86:5 87:6 88:23,25 90:22 91:4 95:2 96:5 96:13,14 97:5 97:23 98:3,17 99:20 100:4,21
--	--	--	--	---	--	---



105:10 107:8 110:18,18 111:17,18 112:1,4 113:10 114:25 116:9 116:18 117:11 121:21 peopling 91:16 perceived 39:1 88:18 perception 5:23 47:9 perceptive 45:15 perfectly 38:10 67:7 perform 87:18 period 10:7,23 13:16 16:10,14 25:3 37:23 40:8 50:1,11 50:12 65:18 68:19 71:8 80:3 96:25,25 periodically 55:1 periphery 50:4 permission 30:18,19 31:2 31:4,6,11 32:3 32:4,9,9 35:20 118:25 permits 118:20 perpetrators 85:11 Persia 98:9 persistent 102:22 person 15:3 19:3 20:25 35:16 87:20 89:5 94:25 122:18 personal 35:13 40:4 53:2 57:18 62:18 66:12 67:1 68:15 96:2 personality 2:13 5:15 19:24 personally 17:21 53:2 67:14,23 69:8,25 70:11 70:12,25 71:25 72:7 perspective 5:6 persuade 37:19 48:24 62:7 66:1 69:6 72:9 80:16 persuaded 46:5 66:4 79:15,20 persuading 48:20 62:1 69:4 83:21 persuasion 88:20 persuasive 110:23 Peter 89:14	phone 44:4 45:8 54:8,14 55:7 56:4,5,10,10 56:13,16 57:12 57:13,17,20 58:10 60:7,8 60:13 61:11,12 62:12,20,21 63:2,12 64:6 64:22 66:5 102:7,23 103:17 105:5 phoned 10:22 29:15,19 30:4 30:11 52:17 54:5,15,16 101:19 phoning 54:23 62:23 64:19 photograph 11:18 33:11 pick 18:2 107:22 picked 97:3 piece 104:22 pieces 49:12,15 place 3:20 43:25 55:8 56:21 59:23 64:11 113:16 119:22 122:15 123:4 123:11,15,16 placed 56:1,2,3 58:1 placement 24:24 plagued 11:9 planned 52:9 planning 104:1,7 plans 6:3 play 95:14 please 8:15,22 9:1 26:10 29:9 55:10 72:11 119:17 plot 101:15 plus 25:10 pm 123:22 point 6:24 9:20 17:14 24:4,11 25:21 37:5,11 39:10 41:2 44:7 47:8 50:17 54:23 60:3,11,21 62:3,23 65:9 67:19 72:20 82:5 85:3 89:3 98:5 99:13 106:14,16 107:12 115:4 115:19,23 police 4:7 39:16 39:17 40:15 41:10 49:2 69:7 105:14 106:6 policies 4:14,16	4:19 37:20 71:19 policy 2:5 17:8 19:21 20:24 24:17 25:16 38:14 39:9 47:18,19,20 48:17,19 52:5 57:1 69:4,10 72:10,15 78:19 87:18 95:15 political 1:17 3:5 3:10,17 4:1 5:16 10:21 19:5,8 22:7,22 23:16 35:8 38:21 40:1 50:19 54:8 56:24 62:12 63:14 67:19 69:14 70:6 84:25 85:4 87:2,4,5,9,13 87:19,25 88:11 88:12 91:10,19 95:22,24 96:3 96:22 97:1,24 99:4 103:21 104:1 politically 21:14 70:1 politician 34:22 36:2 98:11 politicians 1:16 2:2,9,11 3:1,22 4:10,13,15 5:22 39:20 100:3 116:2,14 117:15 politicise 22:10 politicised 39:8 politics 2:12,13 3:1 5:14 37:4 41:22 51:16 70:5,8 71:4 95:2,17,19 96:9 112:24 popular 54:13 110:6 position 17:18 31:10 49:14 63:24 65:24 71:1 72:9 74:1 79:7 93:6 95:6 95:10 98:22 118:7,19 122:3 positions 34:12 possible 6:10 34:5 50:18 57:9 60:23 possibly 25:19 post 32:4 postdates 81:5 postpone 75:22 potential 6:10 74:21 80:4	113:7 power 4:21 10:13,15 21:6 45:23 73:10 113:8 116:18 116:20 powerful 4:24 39:1 83:17 powers 113:6 practical 16:2 practice 1:24 2:23 16:5 19:24 29:1,2 32:5 49:23 56:9 70:10 practices 3:6 5:7 96:18 praying 18:10 precisely 82:21 prefer 99:11 preferred 97:16 prejudicial 106:7 premiership 36:13 37:11 premise 9:17 prepared 42:11 51:13 78:19 80:23,24 117:12 Presbyterian 45:17,18,22 present 2:10 3:8 9:18 103:24 104:13 108:9 presented 30:16 30:20 31:15 President 45:2 press 1:25 2:5,9 2:10,20,21 3:3 3:22,24,25 4:18,21,23 5:8 5:22 6:13 9:23 11:5,6,22 12:2 12:11 13:8,9 13:18,20 15:6 18:20 19:9,25 20:15,17,18 27:4 28:12 29:15 30:4,13 30:15 31:12 33:8 34:1 40:18 64:1,2 72:22,25 77:22 77:23 80:9 83:3,4,17 85:6 88:6,11,13 95:3 96:19 97:8,18 98:10 98:16 99:5,8 99:10,24 108:1 113:5,6,12 115:8,10 116:1 116:10,11,13 116:22,25 117:12 121:23	pressure 14:22 80:22 101:13 pressures 84:8 presumably 69:12 pretty 59:3 102:2 108:8 prevent 3:19 69:1 prevents 23:3 previous 31:13 33:5 116:6 previously 22:17 51:12 53:6 87:20 pre-briefed 22:15 pre-budget 29:18 pre-orchestrated 63:11 pre-recorded 44:9 price 41:1 priest 93:12 primary 33:18 prime 1:13 10:22 16:14 23:20,22 24:5 33:12 36:3,7 51:25 61:21 68:3,4 68:20 72:19 75:5 88:5 100:5 115:25 120:20,23 principle 49:21 print 14:24 15:17 19:19 29:11 printed 61:17 priority 83:11 prison 45:20 82:3 privacy 9:16,25 12:8,11 39:14 76:8 82:19,24 private 66:7 privately 38:17 privileges 2:22 probably 43:5 46:6,7,10 47:19 72:3,8 75:22 90:6 105:22 119:9 problem 11:21 11:25 13:25 22:19,25 31:15 33:15,15 36:16 38:12 63:9 84:20 94:3 99:10 108:15 109:16 110:21 110:25 111:5 111:23 114:24 116:23 problematical	29:4 problems 5:6,7 14:2,2 17:1 23:3 70:22 72:2 procedure 33:13 56:17 proceed 66:17 108:17 109:2 proceedings 1:3 6:23 102:15 process 84:11 produce 82:1 produced 123:10 product 24:24 113:25 professional 4:7 4:12 Professor 19:12 progressed 6:3 promised 79:12 promote 4:14 36:13,24 promoted 4:18 promoting 52:4 prompting 105:1 proper 105:8 112:7,7 114:20 properly 4:16 12:18 40:18 70:7 113:17 proposal 73:24 proposals 73:16 83:16 117:9 propose 21:23 proposed 83:8 proprietor 56:24 proprietors 2:25 57:17 108:18 propriety 87:23 pros 106:13 prosecution 78:20 Prosecutions 78:18 protect 82:17,19 82:24 protection 72:12 73:17 75:11 77:4,6,11 79:7 81:2 protections 72:22 prove 41:18 proved 71:11 117:1 proven 10:17 provide 6:8 10:3 82:23 provided 9:3 107:17 providing 114:13 provision 4:25 11:16 public 1:18 2:21	4:19 6:13 15:23 18:21 22:11 25:16 27:8 29:7,8 31:24 32:7 33:7 36:25 37:12,15,21,22 38:2,15,18,22 40:13 41:14,18 58:11 61:22 62:6 69:20 72:23 73:1,7 73:13,20,22 74:13,19 75:21 76:4,17,22 77:5,10,15,19 78:1,15,16,18 78:20 79:8,20 81:1 105:17 110:13 111:13 publication 14:18 publications 15:12 26:19 publicly 38:11 38:17 46:21 publish 28:8 29:17 33:11 43:23 45:5 101:1 published 5:4 13:21 29:21,24 35:23 104:4,23 publisher 14:19 publishing 6:9 78:19 purpose 3:7 6:14 purposes 57:21 96:2 pursue 37:20 102:11 pursued 38:17 pursuing 4:22 62:24 68:5 pursuit 102:22 pushed 89:18,23 pushing 100:8 put 10:1 12:8 19:17 20:21 21:17 23:11 25:10 31:9 32:15 38:10 43:16 45:20 67:16 79:15 84:18 103:18 109:1 110:16 114:18,19 118:12,17,20 118:23 putting 14:22 17:6 38:11 66:3 102:24
--	---	---	---	--	---	--

**Q**

quality 14:22  
15:4 108:16,20

108:21 109:6 109:16 110:1,2 110:8,11,22 111:5,8,21,25 114:9,22 115:3 115:16 qualms 49:15 quarters 95:8 question 7:11,12 10:1 12:7 15:2 25:20 30:17,18 31:3,21,24 35:21 36:24 39:24 53:21,21 53:22 56:16 73:10 74:14 77:18 95:19 96:12 103:18 104:3 109:20 115:24 116:7 118:22,24,25 119:4 120:10 120:18,23 121:3,12 122:24 questioning 49:24 questions 3:17 4:24 5:2 6:12 7:2,4,8,14,22 8:8,12,25 32:15 53:19 54:10,11,12,17 64:24 84:18 117:20 118:17 118:21 119:5 120:9 122:10 quite 24:14 34:7 35:8 42:22,25 43:16 46:1,13 62:14,16 72:8 73:6 74:22 77:3,3 80:23 84:2 93:18,18 109:11 115:21 quo 83:6 quote 18:4 98:18 quoted 7:3 92:11 quotes 7:24	reaction 121:8 121:12 read 31:4 53:5 53:15 89:16 92:8 95:20 98:8 120:4,5 123:1 reading 53:17,25 121:25 real 25:8 84:20 99:10 109:15 realised 105:10 reality 47:9 100:25 really 10:10 18:20 22:1 24:7 33:3 43:3 51:5 54:3 65:7 66:16 69:9 83:20 94:22 111:22 122:12 realm 73:3 reason 4:1 23:13 38:24 42:16 56:19,20 60:18 65:13 reasonable 79:10 reasonably 78:15 reasons 73:22 Rebekah's 120:22 121:16 rebuild 49:1 recalcitrant 116:22 117:12 recall 44:9 55:8 120:9 122:10 90:21,23 95:3 101:12 118:7 121:16 received 8:3 54:3 recesses 10:14 reclassification 71:20 72:5 reclassified 72:6 recognise 4:9,17 7:24 recognised 3:12 3:23 4:5 117:5 recollection 89:12 90:3 recommend 116:3 recommendati... 2:4 6:20 25:17 107:14 reconsider 67:21 67:25 record 48:8 56:13,19 recorded 44:19 44:21 57:19 records 35:21 37:13,14 40:6 40:7,9 41:20 70:4	rectify 9:18 rector 13:14 red 36:21 47:3 redress 4:25 12:19 redressed 108:7 reduce 21:5 reduced 17:16 19:2 24:22 refer 9:14 15:24 16:1 69:13 102:6 104:22 122:20 reference 1:22 4:4 5:14 62:13 93:9 96:18 referendum 23:25 referred 81:4 referring 81:6,13 93:21 94:17 119:17,21,22 122:1 refers 58:7 reflect 10:6 16:8 reflected 105:23 reflection 10:8 reform 21:21,23 reformed 50:21 50:22 regard 5:2 116:3 regime 6:11 registered 122:12 regret 25:4 regular 36:1 regularly 43:8 regulation 2:5 83:3 107:25 108:5 116:7,11 116:11 regulator 24:16 regulatory 6:11 Reith 19:12 relate 7:12 102:6 102:6 related 15:15 21:11 37:5 121:20 relates 2:19,24 44:8 94:10 118:4 relating 4:25 6:13 47:15 relation 1:6,7 5:7 5:8 26:8,11 39:18 40:2 43:10 45:10 54:3 55:9 58:8 58:22 77:9,11 77:20 78:13,20 79:7 80:1 85:6 88:9 101:15 103:19 relations 2:8 25:23 45:11	47:6 48:1 98:10,15 relationship 2:11 5:22 46:16 50:13 69:24 70:20 91:19 100:3 116:1 relationships 2:1 4:7,10,12 relative 98:19 relatives 31:18 31:20 relevant 2:7 43:12 57:21 74:25 93:4 120:6 relied 97:5 relies 50:23 religious 10:11 116:17 rely 13:18 77:1 relying 86:4 remain 34:13 remaining 8:9 remains 2:18 4:2 6:14 22:24 remarkable 25:3 37:23 remarks 20:16 20:19 remember 11:8 23:21 48:7 57:22 74:8,10 75:19 79:17 81:12 89:18 90:12 91:14,15 92:19 102:7 103:4,5,12 104:20 107:9 107:12 120:20 121:5 123:3 remembrance 18:9 remind 101:20 remove 66:11 removed 25:1 87:12 removes 43:23 repeat 3:18 6:17 116:5 replacement 6:6 replied 67:3 reply 67:13 68:12,13 115:12 report 5:14 14:7 29:19 41:24 85:7,16 104:25 105:21,23 113:3 121:22 23:10 86:5 93:24 100:18 102:25 103:19 105:7 112:21 reporter 105:8	reporters 41:11 reporting 18:23 18:24 102:17 reports 72:13 represent 111:9 Republic 46:11 reputation 20:5 88:17 request 106:10 106:12 required 32:15 requirement 25:1 requires 3:13 research 114:20 115:1 resent 51:2 reservations 52:1 reset 116:2 resign 88:3 resignation 86:1 86:9 103:21 104:5 resistance 23:8 resisted 25:14 resolved 5:24 99:4 resorts 41:23 resourced 114:20 resources 17:6 67:16 110:23 114:8 respect 18:15 47:22 63:2 64:19 respected 116:19 respects 11:21 respond 83:14 118:16 responding 7:6 responsibilities 11:24 25:10 responsibility 11:22 13:5,8 13:18,23 42:6 64:2 97:9 rest 62:8 result 64:7 retain 6:17 retire 11:16 retired 87:16 retreat 71:20 return 60:7 100:13,15 reverse 41:8 review 106:6 revised 43:16,23 45:5 rhetorical 49:14 Rhodri 119:6 Ribbon 35:1 rid 93:11 102:19 ridiculous 46:4 46:13 80:23	right 8:1,14,20 8:21 9:15 10:12,17,20 11:6 17:9,20 19:18 43:11 44:4,13 58:9 64:16 66:2 68:6 69:4 73:13 74:7 76:7,8 77:12 78:6 81:19 97:2 103:11,13 104:13 108:14 113:6 righted 108:7 rightfully 15:17 rightly 16:1 21:19 51:2 53:9 96:17 106:21 rights 11:23 26:18 32:12 37:8 38:7 112:5 risk 4:17 river 23:25 roads 99:14 rogue 76:3 105:8 105:8 role 2:20,23 36:1 86:22 89:19,19 89:20,22,23 90:8,25 91:6 91:22,23,23 95:14 roles 108:3 root 29:2 111:19 rooting 12:23 Rothermere 70:17 round-robin 104:4 ruin 23:23 rule 95:24 rules 19:10 38:5 40:19 77:24 82:3 85:14 89:3,4 95:23 95:23 96:1,7 96:13,14 97:10 rulings 1:5 rumour 84:24 88:23 96:10 run 32:16,19 34:22 runes 51:21 running 69:7 114:12 runs 7:22 Rupert 38:1 43:15 44:2 45:10,24 46:3 55:8,12,17,21 57:13 64:18 65:25 66:23 70:11 120:21	121:8 <hr/> S sack 101:14 sacked 101:25 sad 21:3 28:17 64:23 sadness 25:5 safeguard 116:15 safety 40:17 73:3 sale 40:23 41:5 sanction 12:23 82:18 85:21 sanctions 82:23 sand 36:22 47:3 Sarah 29:20 33:13 34:18 35:5 104:15 satisfaction 71:12 satisfactory 99:7 108:11 Saturday 44:10 saw 62:23 saying 11:14 20:12,12,19 47:12 53:1 77:21,21 82:14 82:21 88:23 92:11 93:1 103:3 112:1 says 7:23 55:8 59:20 62:17 63:21 67:11,22 68:7 75:2 89:6 90:3 93:13 95:3 103:5 110:4 118:11 sceptical 71:8 scepticism 84:1 schedule 43:16 43:23 45:4,5 school 33:18,18 33:24 47:19,20 Scotland 46:9,11 103:20 Scottish 45:16,18 46:2 screen 114:18 scrutiny 6:18 39:20,21 se 22:25 second 12:7 42:22 68:24 81:8,17 84:19 106:9 108:12 109:6 secondly 4:17 18:6 60:14 second-hand 86:5 secret 10:14 Secretary 105:13 Secretary's 106:2
--	---	--	--	--	---	--

section 4:24 7:6 72:11 81:2 108:2 120:5 securing 9:15 security 40:16 73:3 see 5:23 7:1,11 14:10 19:4 22:21 23:4,19 25:11 27:2 42:20 43:11,14 57:19 58:8 63:6,9,9 67:8 69:13,21 70:3 70:3,17 71:17 103:17 111:3 seeing 25:7 42:20 seek 4:13,15 117:22 seeking 7:17 57:9 seen 33:21 59:4 92:4 100:19 107:16 segregate 16:3 Select 105:21,25 selected 22:17 selective 85:11 self-journalism 114:18 self-regulation 83:4 108:5 115:24 sell 109:9 selling 23:24 semantic 14:12 send 18:14 22:9 87:24 sending 63:5 senior 93:7 sensationalise 19:10,19 20:23 sensationalism 17:23 sense 19:11 26:22 37:18 65:8 87:22 104:18 sensibly 29:3 sent 41:9 57:15 57:16 58:5,13 58:14 79:24 107:3 sentence 82:3,6,8 sentences 73:25 74:2 76:15,25 sentiment 20:15 sentiments 20:10 separately 35:8 September 23:14 59:17 60:2 74:6 75:3 83:15,25 104:17,23 106:5,17,20,25 120:1 122:5,22	123:8 sequence 61:2 69:12 series 24:17,25 25:10 50:8 serious 48:25 75:8 86:7 112:23 seriously 18:22 50:5 servant 22:8 85:5,8,16 87:15,22 91:9 91:12 99:3,6 servants 87:4 serve 2:21 37:2,2 service 18:9 25:13 28:2 49:1 61:16 87:8,10 88:7 88:14 96:4 98:1 100:2,4,8 114:13 set 1:23 7:8,23 8:7 16:21 20:20 24:13 33:12,13 79:8 107:18 109:23 115:17 setting 7:15 severe 52:1 Shah 98:8,9 shameful 61:24 share 117:14 Shelley 98:18,19 shift 52:12 shine 10:14 shining 113:7 shocked 31:8 59:23 shocking 63:18 short 45:9 55:5 shorthand 55:2 shortly 59:15 119:24 shot 14:25 show 35:22 40:10 65:14,25 68:16 showing 50:9 shown 94:7 shows 18:17 shred 123:10 side 2:24 sign 21:1 signed 9:5 significant 3:16 4:23 signs 51:22 silent 21:9 similar 34:12 46:18 48:17 Simon 97:13 simply 2:13 7:1 8:6 17:18 23:13 24:3	33:15 65:11 105:21 106:5 110:2 114:2 single 38:12 49:21 sir 6:24 8:21 94:7,13,25 99:13 104:21 105:19 106:4 109:1 112:2 116:24 sitting 5:20 111:7 situation 10:4 12:4 14:7 31:25 63:19 70:19 100:13 100:15 six 17:3 81:6 skin 66:19 Sky 25:2 38:9 slammed 60:13 slight 25:19 slightest 48:5 slightly 9:9 small 3:15 23:1 50:24 Smith 91:13 snap 44:8 social 4:6,9 104:12 society 2:20 5:1 10:12 11:23 39:15 40:5 74:23 soft 72:4 soldier 61:8 solution 5:3 solutions 116:12 somebody 66:5 somewhat 98:12 son 26:8,15 27:16,18 30:2 31:4,11 60:9 61:13,16 64:23 sons 26:15 son's 29:17 30:21 sorry 6:22 9:8 45:14 104:21 115:23 sort 25:6 49:9 53:12 60:13,24 63:19 68:18 70:8 95:4,6 114:17 sorting 109:2 sought 6:7 27:8 sound 72:24 93:17 116:8 sounds 65:13 79:13 91:16 source 26:12 55:15 94:3,5 117:18 speak 10:13 55:20 56:3	100:5 116:18 speaking 45:23 48:10 special 84:16,21 86:22 88:4 95:7,12,16 98:24 specific 3:7 11:25 29:12 89:1 90:12 94:11 97:25 107:9 specifically 2:11 89:8 90:11 92:1,21 94:13 123:4 spectrum 109:13 speculation 105:16 speech 19:7 20:8 20:11 23:10 24:12 50:20 54:6,7,10,14 74:23 76:10 79:24 80:8,10 81:4,9,18,21 81:22 83:1 98:21 100:16 105:4 107:17 spend 53:16,25 spent 17:3 spin 22:2,2 98:4 spinning 98:16 splits 12:11 spoke 44:18 sponsor 15:2 sponsored 111:22 sporting 24:23 37:8 38:8 spotted 5:9 staff 17:4 28:6 28:18 114:11 114:12 stage 31:5 82:8 99:4 107:1 stake 78:1 stalwart 11:13 standard 9:4 13:2 standards 12:4 13:3,10 15:8 15:16,18 20:18 106:7 109:7 start 9:9,12 26:10 44:5 116:16 started 11:8 16:23 23:21 74:10 84:11 starting 9:20 41:2 47:24 state 45:21 46:8 46:10 73:10,11 107:25 116:20 stated 32:18	106:5 statement 7:21 9:3,4,14 13:6 26:7 29:24 30:7 32:21 39:12 44:2 45:12 84:19 85:23 101:10 107:18 statements 7:4,8 12:21 30:1 115:13 123:13 states 85:24 88:15 statesman 11:4 stating 47:6 status 83:6 statutory 78:21 83:3 107:24 117:5,10 stay 46:6 stepping 89:11 stone 89:11 stop 92:23 stories 50:18 100:22 story 3:16 11:10 18:8 26:8,11 26:13 27:6,11 28:8,19 29:11 29:16,23 30:9 32:19 35:20 41:25 60:13,14 strange 49:20 52:7 54:5 123:14 Straw 74:2,17 81:25 83:25 84:13 straying 25:20 street 27:12 49:2 53:16 55:17,18 55:23 56:12,22 57:1,8,16 65:3 87:12 122:12 strength 73:17 strengthened 117:13 strict 114:24 strictly 29:14 strong 46:13 47:23 71:25 82:23 strongly 69:22 72:8 73:6 80:14 83:18,19 structural 33:15 student 13:13 98:8 studies 50:8 study 113:13 stung 52:12 53:3 53:4,8,11 subject 6:18 16:22 106:6 112:16	subjugated 37:16 submissions 6:9 submitted 6:6 24:10 28:1 58:17 subsequent 60:25 subsequently 43:21 104:4 substance 49:14 success 22:3,5 43:9 51:18 98:6 successful 13:14 35:3 46:21 115:9 successfully 23:7 suddenly 65:3 67:10 suffered 27:13 suffering 112:17 suggest 26:1 79:1 122:14,15,17 suggested 25:23 40:24 59:24 84:20 suggesting 77:8 77:18,18 107:4 suggestion 69:18 76:2 80:21 122:11 suggestions 6:5 6:16 115:6 suggests 78:1 suit 63:10 summer 39:6 Sun 18:11 23:15 23:16,20,22 24:6 25:23 26:9,12 27:11 27:22 28:7 29:11,16 30:3 30:7,10 32:18 35:20 49:13 51:7,22 52:6 52:16 53:24 54:6,15,19,21 54:23 59:16 60:3 61:3,17 61:22,25 62:19 62:23 64:14,21 65:4,8,20 66:11,17 68:1 68:7 69:14 119:24 121:14 122:7 Sunday 10:16 40:24 41:6,10 41:16 69:15 Sun's 65:23 superficial 22:4 supply 111:14 support 1:10 4:2 8:15 9:23 20:17 23:15,16	23:19 24:1,5 25:25 26:3 35:14 47:4 51:7,22 52:12 52:17,18,19,21 52:24 53:12 58:11 59:16 60:3,5,6 62:6 70:14 108:21 109:3,5 110:8 110:15 112:13 114:9 119:25 121:14 123:6,7 supported 25:14 25:17 62:4,19 71:14 110:14 111:22 supporters 36:11 supporting 4:18 49:20 62:3,10 65:24 68:8 110:1 suppose 12:20 supposed 20:24 41:4 sure 35:25 53:1 59:4 82:2,15 83:18 93:4,23 96:15 116:15 surely 32:12 surpassed 46:25 surprise 66:18 119:2 surprised 52:6,6 59:24 60:12 62:15 66:8 67:22 surprising 61:20 116:9 surrounding 58:3 survive 109:9 111:25 112:22 suspect 57:24 69:11 91:18 suspects 80:5 suspicious 12:13 sweep 3:10 switch 121:14 switchboard 55:18 sworn 8:24 sympathetic 79:12 sympathise 61:12 sympathy 61:7 system 12:17,19 22:1,13,16,19 22:24,25 38:21 49:2 50:21,22 50:23,25 70:6 87:1 96:4 97:5 97:5,7,19,21 97:24 99:12,25 108:9,25
---	---	--	---	--	---	--

109:24 112:6 118:20 systematic 85:10 systems 97:19	telephone 12:14 41:9 55:12 56:6 58:7 61:1 63:13 122:14 television 99:23 114:5 tell 29:9 31:21 53:15,24 54:22 64:21 65:4,11 68:8 92:15 120:23 122:20 123:12 telling 53:20 101:12,23 120:20 tend 65:16 66:22 tended 23:11 tendency 12:5 terms 1:22 4:4 16:2 25:8 96:18 terrible 88:2 112:3 terrorism 80:2 terrorist 80:4 testing 5:11,12 tests 27:20 text 60:9 102:5 103:5,12,17 122:8 texts 103:7,7 thalidomide 10:16 thank 6:21 8:14 8:19,23 9:7,10 13:5 32:14 34:13 55:3,24 117:21,23 118:2 123:19 123:20,20,21 themes 107:22 they'd 43:20 65:5,12 thicker 66:19 thing 10:17 12:7 17:20 23:22 25:3 52:7 85:2 93:2,5 104:9 115:1,10,14,16 things 7:23 11:7 14:21 34:2 37:9 57:4,6 61:9 65:16 66:25 70:4 76:11 78:2 80:19 84:3,3 85:16 88:25 91:15 95:1,2,2 95:3 100:18,18 102:18 113:10 think 6:16 7:9 8:17 9:20,25 11:4,20 12:3 12:17,18,20,22 12:25 13:2,9 13:10,16,23,25	14:5 15:12,19 17:13 19:12,14 19:24 20:1,12 20:14,19 22:4 22:18 23:2,18 24:1,7 25:8,15 26:17,23 27:5 27:9 28:12,23 29:2,5,12 30:14,25 31:4 32:10,11 33:2 34:18,19,24 35:4,16,19,25 36:19 37:1,25 38:11,18,18,20 38:23 39:3,4 39:24 40:2 41:12,23 43:4 44:13 45:1,4 45:14,16,24 46:1,18,19,20 46:21 47:1,8 47:14,22 48:3 48:4,9,11,13 49:8,25 50:12 51:2,6,24,25 52:3,9,15,20 53:4,6,8 54:18 57:3,5,25 58:13,17,25 59:8,12 63:25 64:17 65:16 66:4,7,8,18,21 68:13 70:5 71:2 72:21 73:4,11 75:14 76:23,25 77:22 77:24 79:6,17 79:23,24 80:21 81:12,14,20 82:7 83:9 84:2 84:4,5,15 85:2 86:3,19 88:13 89:2,14,15,21 89:23,24 90:4 90:5,6 92:7,10 92:17 93:20 94:5,20 96:8 99:9,12 100:2 100:5,10,11 101:3,17 102:3 102:10 103:2,8 103:10,14,16 104:6,18 105:22 106:13 106:14,24 108:5,8,9 109:1,5,14 111:8,11,18,20 114:13 115:5 115:17,21 116:6,7 117:4 117:8,9,11,13 118:9,21 119:1 119:9 120:1	121:9 122:13 thinking 33:20 68:11 82:5 109:11 third 63:1 Thomas 93:11 thought 21:25 30:12 33:7 44:3,14 47:13 58:11 61:13 65:20 67:14 72:1 76:17,21 76:21 87:2 89:9 92:11 99:16,18 103:10 109:22 thousand 111:17 thousands 110:18 threat 9:24 63:16 63:17 64:6 threaten 88:18 threatened 59:17 59:21 60:15 threatening 63:12 threats 62:14 73:2 75:8 three 24:4 27:18 58:17,18 59:9 59:12 73:1 78:2 time 10:6 12:10 13:15 16:22 19:10 23:20 26:21 27:20,22 30:10 36:7,17 42:19 48:14 49:16 51:24 53:17,25 54:7 56:15 58:19 62:7 63:1,5,19 63:21 67:1,3 67:13 68:9,25 71:8,10 72:14 72:18 75:24 76:1,17,21 84:4,4,7 89:16 92:8 94:15 100:17 101:1,2 105:16 106:2 110:7 123:11 123:17 times 10:16 11:10,17 40:24 41:6,10,16 43:1 54:16 68:1 69:15 104:23 106:19 118:22 timing 120:22 Timor 16:18 tittle 84:24 tittle-tattle 88:22 today 1:5 11:25 14:7 20:12	97:8 111:7,7 today's 14:24,24 told 18:16 27:23 29:10 31:1,18 45:11 49:13 50:19 62:4 63:21 74:10,12 75:16,18,20 92:15,21 104:2 104:7,9 120:25 121:1,5 tolerated 41:21 Tom 102:9 103:3 tomorrow 14:3 94:8 Tony 1:14 20:12 21:19 83:9 85:24 86:3 top 43:11 48:19 81:18 83:2 topic 101:8 torch 10:14 Tory 51:23 88:19 totally 12:2 59:1 65:12 70:15 touch 101:7 tough 96:13 toughened 95:25 tougher 95:23 town 113:14 track 2:18,19 traditional 87:15 87:25 tragedy 19:2 trained 112:12 trampled 112:5 transacted 56:4 transcript 119:15 transcription 59:3 transferred 89:10 transformation 15:21 transparency 99:15 116:4 transparent 3:13 97:7 transpires 5:18 Treasury 71:10 84:21 87:11,17 88:4 91:10 94:2,4 98:24 treat 18:21 treated 3:1 33:24 Tribunal 7:7 tried 22:6,13 23:6 36:9 43:4 51:3 64:25 65:11 66:1 87:11 97:10 109:22 trigger 82:7 triggered 82:18 trivialisation	33:3 trivialise 19:11 troop 17:10,11 troops 16:16 17:2,21 18:5 18:13 21:5,8 61:4 62:9,10 62:11 65:21 69:19 trouble 10:24 true 14:5 18:6 113:9 truly 75:11 trusted 87:22 110:12,24 117:18 trustworthiness 101:5 truth 9:4 10:13 45:23 88:24 116:18 truthful 48:4 try 20:17 21:24 23:22 31:16 36:13,14 100:13,15 trying 22:9,10 36:24 37:19 38:14 48:25 62:7 64:25 69:1,9 86:25 102:5 111:19 111:19 115:6 122:14,15,17 Tuesday 61:11 turn 5:25 35:21 56:18 84:16 Turning 7:21 turns 45:4 two 1:13 7:9 8:12 10:4 11:9,21 11:24 34:4 42:16 43:12 46:23 54:17,20 57:19 58:15 59:9 68:19 72:12 76:6,12 82:4 91:4 108:3 two-term 68:3 two-year 82:8 type 120:5 typed 59:5,10	122:18 uncomfortable 49:10 76:5 undeniable 2:19 underhanded 41:12 undermine 1:11 24:16 undetermined 65:19 undermining 68:7 underpinning 114:7 117:5,10 underpins 15:4 understand 7:17 8:1 22:12 55:14 57:11 61:8 67:15 73:17,19 77:17 91:19 102:13 understandable 71:15 understanding 49:5 89:10 understood 46:1 46:19 119:8 under-the-cou... 40:23 41:5 unfair 26:19 unfortunate 33:3 105:22 unfortunately 21:12 30:3 64:21 89:20 95:18 98:15 105:19 unintended 5:8 Union 46:5 university 13:13 13:15 unlawful 12:14 41:13 unnecessarily 27:2 unpopular 54:11 99:20 unrealistic 88:12 unresearched 19:17 unsuccessful 22:20 unusual 65:2 upbringing 10:11 116:17 upheld 12:4 uphold 20:18 upholding 13:10 upset 32:24 61:9 urge 108:12 use 19:8 41:12 52:12 58:11 96:1 111:11 utmost 61:7 uttered 59:18 60:24 93:10
---	--	---	--	---	---	---

120:12	38:5,6,8 55:20	wedding 34:17	winning 97:22	wrongly 53:9	14228 58:5	81:4 106:25
utterings 93:11	61:12 64:21	week 1:14 5:18	wise 45:11 47:7	wrongs 108:6	14235 81:11	26 59:6,10 66:24
u-turn 71:19	65:4 67:19	5:20 101:23	48:2,12	wrote 35:12	15 25:9 45:2,2	27 44:1
<b>V</b>	71:17 80:3,20	111:3	wished 16:3 67:9	66:23 104:18	16 74:24 101:10	28 59:17 82:12
valuable 25:13	87:24,24 92:13	weeks 1:13 52:13	wishes 3:17	106:4,17	17 6:7 74:24	<b>3</b>
value 27:2	92:15 101:25	64:10 81:6	withdrawal	109:19	18 51:11 75:3	3 5:19 81:5,11,14
valued 61:16	102:11,19	week's 2:17	withdrew 52:24	<b>Y</b>	19 11:18 43:13	3.5 17:4
80:19	103:1	weight 17:19	witness 7:4,8,16	Yeah 46:18	19th 108:18	30 9:3 35:4,25
variations 79:4	wanting 11:3	welcome 6:16	8:21 9:3 13:6	year 57:20 94:16	1920s 109:23	60:2 94:8
various 6:5	91:18	51:14 99:15	44:2 84:19	122:2	1926 11:13	120:1 122:5,22
106:13	wants 46:9	100:12	85:23 107:18	years 11:10,19	1930s 14:5	123:8
vast 8:7	118:17	well-known	witnesses 2:17	19:13 24:4	1940s 15:9	30s 11:12
ventured 73:22	war 18:22 36:6	102:2	5:11,21 7:2,5	50:1 51:11,19	109:24	31 6:4
verify 57:3	46:7 58:12	Wendi 34:25	7:14 8:5,7	71:5 82:4	1970s 87:3 98:7	33 58:24
version 59:4	59:18 62:2,3	35:4	113:20	92:12,14	1990s 98:13	34 74:8,23
61:17	65:19,24 67:5	went 29:24 33:24	woman 61:6	109:16	1997 21:18 48:1	35 16:16 104:19
vested 36:24	67:12,16,18	34:2 38:13	women 39:1	yesterday 14:2	49:13 50:12	<b>4</b>
37:16 38:21	68:10 69:5,16	44:20 46:12	wondering 90:1	92:9	51:7 96:25	4 5:25 6:13 44:4
veteran 11:13	69:18 120:12	75:20 87:1,12	word 53:4	yielded 80:22	<b>2</b>	44:6 55:11
view 10:10 17:17	warm 46:16	87:17,17 98:2	words 13:1 20:14	York 57:23,25	2 2:3 4:5 58:4,23	4,900 17:2
19:5,8 38:19	warn 70:22	weren't 48:17,19	52:12 55:18	104:23 106:19	20 109:16	40th 34:15 35:5
45:24 47:24	90:11,14	69:25 74:20	59:18 83:6	young 13:12	20th 108:19	461 88:15
71:22 72:4	warned 91:1,13	Westminster	93:10 102:24	33:19,23	2005 91:11	<b>5</b>
73:9,13 74:11	warning 90:20	18:25	109:25 120:12	younger 26:8	2006 26:8 27:11	5 42:11 43:24
74:12,13,16	91:16	we'll 27:10 42:23	120:13	<b>Z</b>	32:20 35:13,24	54:18 59:10
75:17,18,18	warnings 91:17	45:5,8 47:14	work 1:11 9:8	Zealand 117:3	72:13 86:10	50 16:19,19
80:24,25 83:17	wary 70:21	85:22	24:21 25:12	zero 14:18,20	101:15 102:10	51st 46:8
84:14 86:3,4	wasn't 23:13	we're 8:11 14:1	34:23 35:7,8	111:16	103:19	52nd 46:10
90:24 91:3	33:15 44:23	14:10,11 21:5	71:11,12 85:15	<b>0</b>	2007 20:9 21:22	55 72:11 81:2
102:9 110:20	51:9,10 74:14	39:12 49:13	87:9,24 96:5	01917 59:5	42:10 43:24	57 11:19
views 16:8 19:17	77:8 89:22	54:1 55:7	97:24 100:3	01921 59:7	44:9,12 48:1	<b>6</b>
46:3,13,14,14	107:11 120:16	60:21 63:25	worked 12:17	<b>1</b>	50:12 51:3	6 23:12,44:3,5,10
46:15,19 47:2	Watson 101:7,13	76:23 81:5	22:20 85:4	1 1:24 16:1,19	74:6 75:3 81:4	44:12 81:18
48:16 67:23,25	101:18,19	96:21 101:17	87:4 89:1 91:9	23:12 81:15	83:15,25 97:10	107:21
69:14 72:7	102:2,9,14,17	103:16 114:21	91:20,25 98:1	104:23	107:16	60 92:12,14
80:11,12,12,13	103:3,15,19,22	123:14	99:6 100:18	1.09 123:22	2008 24:11 34:15	600 17:3
80:13,21 83:20	Watson's 104:4	we've 8:2,3 16:5	working 28:6	10 10:23 57:21	34:16 45:2	61 85:23
87:6 114:18,19	way 2:23 3:14	29:3 39:17	87:7 94:15	58:6 64:13	74:24 82:10	64 84:20
117:14	4:5 5:17 11:5	42:11 59:12	world 10:19 11:4	71:5 74:6 75:3	84:9,11 89:7	<b>7</b>
virtually 21:8	12:11 15:9	67:24 79:21	30:14 55:19	83:15,25 87:1	90:1 94:9,18	7 84:9
visited 103:20	22:2,19 27:3	99:4,6 106:21	56:25 69:15	88:5 89:24	2009 23:14 24:12	7-day-a-week
vital 1:21 40:17	28:22 30:5	107:16,21	80:15 108:16	98:2,25 106:5	34:17 37:23	14:8
volume 81:15,16	33:7 34:2,9,11	116:14	114:15,19	121:19 122:1	39:6 43:13	74 119:20 120:3
voluntary 34:6	38:6,9 42:6	Whelan 84:22	worried 9:24	122:21 123:5	51:19 57:20,21	<b>8</b>
vulnerable 12:10	49:9 52:7,21	85:10 86:15	65:23	<b>0</b>	58:22 59:12,17	8 26:6 84:9
<b>W</b>	57:4,5,8 59:22	92:1 94:12,15	worries 93:1	10.00 1:2	64:13 120:1	119:10,12
waiting 50:22	61:23 62:17	White 35:1 97:18	worse 98:12	10.15 1:4	2010 21:9,18	<b>9</b>
75:17	65:19 66:2	wholly 22:20	worst 92:12,14	108 92:20	35:13 37:24	9 39:12 74:24
want 2:15 11:16	68:22 73:12	71:16 99:7	98:10	11 1:1	42:10 66:24	9,500 17:2
17:15 21:23	74:19 78:13	wider 3:9	wouldn't 30:7	11.30 55:4	96:25 98:13	
25:21 26:1	84:14 87:7	wife 28:21 29:10	57:13,16 81:22	11.39 55:6	101:18 104:18	
27:1 33:20	88:8 89:16	29:19 30:11	85:13 121:10	12 20:9 43:11	104:23 106:5	
56:12,13,14,19	91:9 95:10	32:19,21,23,25	write 67:1 68:17	51:19	106:17,20,22	
57:2 60:18	96:16 97:3,11	34:13,23,25	writer 55:2	12.33 57:22	106:25	
62:22 71:24	100:18 108:2,4	35:12,16,22	written 34:3	13 35:22 50:1	2011 33:1	
77:1 81:22	108:23 117:4,8	44:12 102:2	61:5 64:18	13-year 96:25	2012 1:1 6:4 9:4	
90:5 102:12	121:6,10	103:24	wrong 11:7	14 58:24 59:7	14:8 28:17	
108:23 116:6	ways 2:21 3:2	wife's 35:7 103:7	17:17 23:18	14207 9:14	2016 25:9	
118:12 122:20	5:25 48:17	103:17	34:7 42:1	14212 107:18	21 7:6 119:18	
122:24	65:12 111:9	willing 31:22	47:13 73:23	14214 26:6	24 58:22	
wanted 10:2 21:7	weakest 5:1	willingness	76:12 81:16	14215 39:13	24-hour 53:18	
25:25 26:15	web 14:11,12,12	28:11 76:11	85:17 93:18	14222 101:11	71:20 72:2	
29:21,24 33:16	14:13	wills 21:17 74:16	104:9		100:24	
33:22 38:2,3,4	website 5:4 6:9	84:12	wrongdoing		24-hours 14:8	
	109:1	wing 19:18,18	41:15 73:2		25 18:16 61:6	

# EXHIBIT Q

<p>1 2 (2.00 pm) 3 MR JAY: Mrs Brooks, may we move to what a couple of Labour 4 politicians would say. Do you recall an occasion at the 5 time of the Labour Party Conference in Brighton 6 in September 2004 where Mr Chris Bryant MP had been 7 speaking at a fringe meeting and argued that 8 Rupert Murdoch should not be allowed a monopoly in the 9 UK? Do you recall that? 10 A. I don't, I'm afraid. No, I'm sorry. What year was it? 11 Q. 2004. As he arrived at a News International reception, 12 you approached Mr Bryant. Do you recall that? 13 A. I think I know what anecdote you're referring to. 14 Q. It's not an anecdote. It's in a witness statement I've 15 seen. You said, "Ah, Mr Bryant, it's dark, isn't it? 16 Shouldn't you be out of Clapham Common by now", or 17 something like that. Did you say that? 18 A. I don't remember saying that, no. 19 Q. Do you remember what your then husband said? 20 A. I remember what Mr Bryant said my then husband said. 21 Q. He was extremely rude, wasn't he? 22 A. Mr Bryant? 23 Q. No, Mr Kemp, your then husband. 24 A. I don't think he said that. 25 Q. Mr Watson. You had it in for Mr Watson, Mr Watson would</p> <p style="text-align: center;">Page 1</p>	<p>1 knew were completely untrue? 2 A. No. 3 Q. Did you tell Mr Nick Robinson -- of course, the 4 political editor of the BBC -- in August 2011 -- or 5 rather, did you speak to him at a Labour Party 6 Conference 2009, along the lines: "What am I going to do 7 about this Tom Watson?" 8 A. May have done, yes, but I can't remember saying that 9 exactly. 10 Q. Do you feel that you might have used the Sun as perhaps 11 an unfair means of disparaging politicians you did not 12 particularly like? 13 A. No, I don't think that. 14 Q. I go back to the BSKyB issue and paragraphs 90 to 92 of 15 your witness statement, please, Mrs Brooks. 16 A. Yes. 17 Q. Paragraph 90. This is our page 02587. You say in the 18 fourth line or third line: 19 "As might be expected, many people sought to raise 20 the issue with me and I became involved in defending the 21 bid to them." 22 So you're suggesting there you were always adopting 23 a defensive position; is that right? 24 A. I include lots of people who were members of the 25 anti-Sky bid as well, so not necessarily just</p> <p style="text-align: center;">Page 3</p>
<p>1 say -- indeed, will say -- following Mr Watson's 2 resignation in 2006. Is that true? 3 A. That that's what Mr Watson would say? 4 Q. No, not merely that that's what he's going to say but 5 there's the underlying truth to it. You had it in for 6 him and you have encouraged the Sun to write adverse 7 material about him. Is that true? 8 A. No. Well, sorry, the Sun has covered -- has written 9 adverse things about Mr Watson. I think Mr Watson is 10 referring to an incident -- and I can't remember when it 11 is, I think 2006 -- when he galvanised the troops, as in 12 backbench rebellion, in order to force Mr Blair to 13 resign. It was called the curry house coup at the time 14 and there was a situation where the night before 15 Mr Watson published the letter, which Mr Bryant was also 16 on, I believe, calling for Tony Blair to step down, he'd 17 driven halfway across Scotland to see Mr Brown, and when 18 the newspapers confronted Mr Watson and said, "You 19 clearly did tell Mr Brown", he famously said, "No, I was 20 just delivering a Thomas the Tank DVD." And I think the 21 subsequent coverage, not just in the Sun but the Times 22 and lots of newspapers, were very critical of Mr Watson. 23 I think that's where it originates from. 24 Q. Did you force Mr Passcoe-Watson, or another Sun 25 journalist, to write stories about Mr Watson that he</p> <p style="text-align: center;">Page 2</p>	<p>1 politicians. The fact is that it was a common 2 misconception and often reported that News International 3 was trying to buy the remainder of the shares in BSKyB 4 rather than News Corp, and that subtle distinction, 5 therefore, because it was in the UK territory was -- 6 perhaps understandably got confused. And so, yes, there 7 were occasions when I defended the bid. 8 Q. You do say in paragraph 90, on the next page: 9 "When the matter arose in conversation, I am sure 10 that I would have expressed my views forcefully, 11 particularly given the vocal opposition." 12 So it might be said the stronger the opposition, in 13 your eyes, the more forceful you needed to be. Would 14 you agree? 15 A. I think the anti-Sky bid alliance had so many different 16 members from all over the media and lots of other 17 commercial rivals of Sky that -- and that they, I knew, 18 were seeing politicians and I think Dr Cable had 19 a dinner with them in -- early on in 2010. 20 So, I think, yes, I did. When I met people, if 21 I had the chance to put our side of the story, so to 22 speak, I would. 23 Q. And those people included Mr Cameron and Mr Osborne, 24 didn't they? 25 A. Not Mr Cameron. I did have a conversation with</p> <p style="text-align: center;">Page 4</p>

1 (Pages 1 to 4)



<p>1 Mr Osborne. I may have mentioned it to Mr Cameron, but</p> <p>2 it's not to be dwelled on because it wasn't</p> <p>3 a particularly long conversation. But I did have</p> <p>4 a conversation with Mr Osborne about it, I think some</p> <p>5 time in 2010, where I put my views that were contrary to</p> <p>6 the ones that he had heard from everyone else in the --</p> <p>7 Q. We'll come back to that in a short time. In</p> <p>8 paragraph 92 of your statement, you say:</p> <p>9 "With regard to the suggestion that I had</p> <p>10 'discussions' [and you put that term in inverted commas]</p> <p>11 with David Cameron and George Osborne, I am sure I did</p> <p>12 refer to the issue generally."</p> <p>13 So is that statement relevant to both Mr Cameron and</p> <p>14 Mr Osborne?</p> <p>15 A. Yes, but -- in general discussion in terms of -- always</p> <p>16 in relation to the -- usually in relation to something</p> <p>17 I'd heard that the anti-Sky bid had put forward, but</p> <p>18 I remember better conversation with George Osborne some</p> <p>19 time in 2010, but obviously as discussed, the BSKyB bid</p> <p>20 was mentioned at dinner at our home in December, but</p> <p>21 I don't remember having a particularly forceful</p> <p>22 conversation with Mr Cameron will about it, although our</p> <p>23 views on the BSKyB bid -- News Corp views and the</p> <p>24 News International views and my views -- were pretty</p> <p>25 clear.</p> <p style="text-align: center;">Page 5</p>	<p>1 Q. I think my question was only: was he supportive of the</p> <p>2 bid or not?</p> <p>3 A. And as I say, he never explicitly said so.</p> <p>4 Q. But could you infer whether he was supportive or not?</p> <p>5 A. No. He was interested in our arguments. I think that's</p> <p>6 probably at its best.</p> <p>7 Q. Were you aware of the role Mr Fred Michel was occupying</p> <p>8 in relation to the bid?</p> <p>9 A. Well, I was aware at the time, but not to the extent</p> <p>10 that I've now seen. But I was aware, yes.</p> <p>11 Q. So when you say to the extent that you have now seen,</p> <p>12 are you referring to the 163-odd emails?</p> <p>13 A. Yes. I hadn't realised there were that many emails, but</p> <p>14 yes, I was aware of his role in the BSKyB bid.</p> <p>15 Q. When did you read those emails?</p> <p>16 A. I actually still haven't read them all.</p> <p>17 Q. You've sampled them?</p> <p>18 A. I saw some during the evidence given by James Murdoch.</p> <p>19 Q. And when they were drawn to your attention in that way,</p> <p>20 did they surprise you in any way?</p> <p>21 A. I think the truth is at the time -- at the time of the</p> <p>22 BSKyB bid, I suppose, like most journalists, I viewed</p> <p>23 public affairs and lobbyists with slight scepticism, and</p> <p>24 I often thought that Mr Michel perhaps overegged his</p> <p>25 position. However, he was doing his job. He was</p> <p style="text-align: center;">Page 7</p>
<p>1 Q. Were they shared by Mr Cameron?</p> <p>2 A. Mr Cameron always made it very clear that it was -- that</p> <p>3 he turned it into or it was a quasi-judicial decision</p> <p>4 and it wasn't him and it was off his remit and he,</p> <p>5 I think, had been lobbied by lots of other people, so it</p> <p>6 wasn't -- I would say no, it wasn't particularly shared.</p> <p>7 He was always very even-handed about it.</p> <p>8 Q. Was Mr Cameron supportive of the BSKyB bid, to your</p> <p>9 knowledge?</p> <p>10 A. Not particularly, no.</p> <p>11 Q. Was he at all supportive of it?</p> <p>12 A. No, but I think it would be fair to say that he</p> <p>13 understood why we wanted to present our view in relation</p> <p>14 to the other lobbying he was getting.</p> <p>15 Q. Was Mr Osborne supportive of the BSKyB bid?</p> <p>16 A. I think -- he never said so. He never said explicitly</p> <p>17 that. However, I think one of the points that we were</p> <p>18 trying to make about the bid was if that kind of level</p> <p>19 of investment was coming into the UK, that contrary to</p> <p>20 what the anti-Sky bid alliance were saying, in that it</p> <p>21 would be a bad thing, that actually we thought in the</p> <p>22 call centres around the country, the creation of jobs,</p> <p>23 that it would -- that we would try and put those</p> <p>24 arguments to Mr Osborne. But again, they would all say</p> <p>25 the same thing: "It's not my decision."</p> <p style="text-align: center;">Page 6</p>	<p>1 passing on information as lobbyists do.</p> <p>2 Q. How do you know he was overegging his position?</p> <p>3 A. I always thought -- I suppose because, as journalists,</p> <p>4 we would have quite direct contact with ministers and</p> <p>5 prime ministers and -- you know, in the course of our</p> <p>6 work, but I always thought it was slightly strange that</p> <p>7 he had that level -- not slightly strange, actually.</p> <p>8 That's not fair. Fred was very good at his job.</p> <p>9 I always thought the level of access that seemed to come</p> <p>10 out was -- was pretty good, really.</p> <p>11 Q. Okay. A couple of documents in these 163 emails feature</p> <p>12 you. Only a couple. This is KRM18. We've got one of</p> <p>13 them under tab 17 in the bundle.</p> <p>14 A. Tab 17, okay.</p> <p>15 Q. We can probably put it up on the screen. I'm not sure</p> <p>16 it's going to be available to anybody else. From the</p> <p>17 PROP file, 100001657. You may have it as a separate</p> <p>18 piece of paper, Mrs Brooks. I don't know.</p> <p>19 A. I do. Thank you, Mr Jay.</p> <p>20 Q. It relates to 12 October 2010. You were copied in on an</p> <p>21 email from Mr Michel to Mr Anderson.</p> <p>22 A. Mm.</p> <p>23 Q. Are you with me? Mr Anderson we heard with</p> <p>24 Mr James Murdoch, but I've clean forgotten who he is.</p> <p>25 Could you remind me?</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 A. He it is -- so Fred Michel is public affairs for 2 News Corp Europe and Asia, and Matthew Anderson is 3 corporate communications for News Corp. 4 Q. The general gist of this email is that -- the bid is 5 still with Dr Cable. This is before 21 December -- 6 A. Right, okay. 7 Q. "It's necessary to keep briefing senior Lib Dems and key 8 cabinet ministers." 9 Why do you think you were copied into this email? 10 A. I'm not sure, because I wasn't copied in to many of 11 them. 12 Q. No. 13 A. So I don't know. There would be regular meetings 14 between the News Corp people who were in charge of the 15 bid and occasionally -- maybe I was in that meeting? 16 I don't know why I'm copied in to this one particularly, 17 but -- 18 Q. You were copied into the next one, which is the same 19 part file, PROP100001679 -- 20 LORD JUSTICE LEVESON: Hang on, just before -- sorry, are 21 you going to 1679? 22 MR JAY: Yes. Sir, that's probably the only one you have in 23 that file. 24 LORD JUSTICE LEVESON: It is, yes. All three emails are on 25 the same sheet.</p> <p style="text-align: center;">Page 9</p>	<p>1 A. I must have done, yes. 2 Q. Yes, otherwise you wouldn't have been able to reply so 3 quickly? 4 A. Quite rightly. 5 Q. And the reference to "GO" is not including his special 6 advisor; it is to GO personally, isn't it? 7 A. It is, yes. 8 Q. Why were you discussing the issues letter with 9 Mr Osborne at all? 10 A. Well, I don't -- you're telling me now that it was at 11 the time of the issues letter so I accept that. My 12 memory from the dinner was that it was with my husband 13 and I, Mr Osborne and his wife, and Mr Lewis and his 14 wife. So it was the six of us. It was in a restaurant, 15 more of a social occasion, but like I said in my witness 16 statement, I -- I probably brought it up, but I can't 17 remember, but there would have been a part of the dinner 18 I would have discussed our frustration, perhaps, at the 19 time, of what was going on. So I don't know whether 20 I brought it up or George, but we did discuss it at that 21 dinner. Not at any great length, because -- 22 Q. It's a point of detail, this, isn't it, what's in an 23 Ofcom issues letter? You'd agree with me? 24 A. Yes, but that wouldn't have been -- I mean, that 25 wouldn't have been my stance on it, because I probably</p> <p style="text-align: center;">Page 11</p>
<p>1 MR JAY: Yes, I'd found an earlier one, ploughing through 2 KRM18 as I did a few days ago so, just to see if there 3 was anything else relevant. The most relevant one is 4 1679, which you'll have, Mrs Brooks, in tab 17. 5 A. Right, the one that starts: 6 "Very good debrief with Hunt"? 7 Q. That's right. 8 A. Yeah. 9 Q. It's dated 14 December 2010. It's sent from Mr Michel 10 to Mr James Murdoch and you're copied in. Are you with 11 me? 12 A. Yes, I am. 13 Q. The issues letter, I think, was the Ofcom issues letter, 14 wasn't it? 15 A. Was that the time? I mean, you obviously have the 16 chronology, but I accept that. 17 Q. Scan up the page, though. Three minutes later, you 18 reply to Mr Michel, don't you: 19 "Same from GO -- total bafflement at response." 20 The reason why you were able to reply so quickly, 21 I think, is that you had had dinner with Mr Osborne the 22 night before, hadn't you? 23 A. That's correct. 24 Q. So you had discussed the issues letter with Mr Osborne 25 the night before, hadn't you?</p> <p style="text-align: center;">Page 10</p>	<p>1 wasn't all over the complexities of an Ofcom issues 2 letter, as chief executive of News International. 3 Literally, my main focus of -- my main involvement in 4 the BSkyB bid, if you like, was informal, as in nothing 5 to do with the transaction, but was generally in 6 response to the huge amount of opposition and lobbying 7 that was going on by the anti-Sky bid alliance. 8 Q. You told us that already. 9 A. Yes, but -- 10 Q. What this dinner must have encompassed was a discussion 11 about the issues letter, because the email makes that 12 clear. Would you agree? 13 A. I agree with you. That's exactly what the email says. 14 But I don't remember a detailed conversation at a social 15 dinner about the complexities of an issues letter at 16 Ofcom. It may have been precisely three minutes of me 17 saying, "Can you believe that that has happened?" and 18 George Osborne looking slightly perplexed and me 19 responding to Fred Michel the next day. I mean, it was 20 a very brief conversation, but it did happen. 21 Q. Plainly it did happen, but it's not Mr Osborne looking 22 slightly perplexed. He's "totally baffled" according to 23 you. 24 A. "Totally baffled", then, was my interpretation of his -- 25 Q. The conversation must have been initiated by you,</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)

<p>1 Mrs Brooks. You don't hold back on these occasions, do 2 you? 3 <b>A. I just can't remember whether I brought it up or not.</b> 4 <b>That's at all.</b> 5 Q. There are two possibilities: either Mr Osborne did or 6 you did. 7 <b>A. Let's say I brought it up then.</b> 8 Q. Yes. 9 LORD JUSTICE LEVESON: I don't want you to guess. 10 <b>A. I'm being forced to guess, sir, I'm sorry.</b> 11 LORD JUSTICE LEVESON: No, I promise you, you're not being 12 forced to guess. 13 <b>A. Well, I can't remember who brought it up, but I'm happy,</b> 14 <b>for argument's sake, Mr Jay, to accept that I did. But</b> 15 <b>I'm not sure that's the case.</b> 16 MR JAY: Do you think it's an appropriate conversation with 17 Mr Osborne? 18 <b>A. I think it --</b> 19 Q. Or not? 20 <b>A. I think it was an entirely appropriate conversation.</b> 21 <b>I was reflecting the opposite view to the view that he</b> 22 <b>had had by that stage from pretty much every member of</b> 23 <b>the anti-Sky bid alliance on many occasions. So I think</b> 24 <b>for one three-minute conversation at the beginning of</b> 25 <b>dinner, I got the opportunity to give our view. I don't</b>  <p style="text-align: center;">Page 13</p> </p>	<p>1 <b>A. Yes, well, he was baffled at the response. It's</b> 2 <b>still -- I'm not sure what the question is, Mr Jay.</b> 3 MR JAY: At this stage, of course, Mrs Brooks, you knew 4 where everybody in the cabinet and this Coalition 5 government stood in relation to support or otherwise for 6 the BSkyB bid, didn't you? 7 <b>A. No, I didn't. I particularly didn't know Mr Cable's</b> 8 <b>view -- personal view.</b> 9 Q. You didn't have any suspicions at all as to what his 10 view was? 11 <b>A. No. In fact, I'd assumed Mr Cable would carry out that</b> 12 <b>responsibility as any minister would, you know, as --</b> 13 <b>properly, without personal prejudice.</b> 14 Q. By the time you'd read the email, the first in the 15 chain, if not before, you were well aware what Mr Hunt's 16 view was about the merits of the BSkyB bid vis-a-vis 17 News Corp, weren't you? 18 <b>A. I said to you earlier: I don't remember hearing anything</b> 19 <b>from Mr Hunt directly on the bid particularly, but</b> 20 <b>I have a recollection that he put something on his</b> 21 <b>website. I think it came up in this Inquiry. So --</b> 22 <b>that he put something positive on his website, wasn't</b> 23 <b>it, or --</b> 24 Q. Didn't you have conversations with Mr James and 25 Mr Rupert Murdoch about how the bid was getting on and  <p style="text-align: center;">Page 15</p> </p>
<p>1 <b>see why that's inappropriate.</b> 2 Q. If you remember the length of the conversation, you 3 might be able to assist us as to who initiated it. 4 Couldn't you agree? 5 <b>A. Accepting for the sake of argument that I brought it up,</b> 6 <b>I just can't remember if this is absolutely true.</b> 7 Q. Another reason you're diffident about it: it's obvious 8 from your one-line email that we know what Mr Osborne's 9 thinking is about the bid generally, don't we? 10 <b>A. Well, I obviously remembered from the conversation,</b> 11 <b>which -- I can't remember exactly how long it took, but</b> 12 <b>from the limited conversation that we'd had the night</b> 13 <b>before, that he was baffled at the response. That's</b> 14 <b>what I say. I'm not -- I'm agreeing with you on the</b> 15 <b>email.</b> 16 Q. Yes, but it's also obvious that he was supportive of 17 your bid, wasn't he? 18 <b>A. No. Bafflement. Or he was perplexed at the --</b> 19 <b>whatever -- you're telling me it was the issues letter.</b> 20 <b>I'm -- fine. He was baffled at the response.</b> 21 LORD JUSTICE LEVESON: Hang on, Mr Jay isn't quite telling 22 you that. Paragraph 92 of your statement proceeds on 23 that premise. 24 <b>A. That it was the issues letter?</b> 25 LORD JUSTICE LEVESON: Yes.  <p style="text-align: center;">Page 14</p> </p>	<p>1 who was supporting it? 2 <b>A. I think my conversations with Mr James Murdoch and</b> 3 <b>Mr Rupert Murdoch about the bid were in essence probably</b> 4 <b>discussing the latest move of the anti-Sky bid alliance.</b> 5 <b>So I remember having to call Mr James Murdoch when the</b> 6 <b>anti-Sky bid alliance commissioned a poll through their</b> 7 <b>PR agency they'd hired -- I think Webber Shandwick --</b> 8 <b>and their poll had discovered that 80 per cent of people</b> 9 <b>didn't want us to buy the rest of Sky shares. So</b> 10 <b>I would probably update -- because the anti-Sky bid</b> 11 <b>alliance was, of course, working in the UK territory, so</b> 12 <b>there would be occasions when I would update Rupert or</b> 13 <b>James Murdoch and there were internal meetings that went</b> 14 <b>on inside News International that occasionally I would</b> 15 <b>attend too.</b> 16 Q. News Corp or News International regarded it as important 17 to lobby government generally in relation to this bid. 18 Are we agreed? 19 <b>A. I don't think that was a strategy. I think it was</b> 20 <b>a response.</b> 21 Q. Regardless of what originated it, it is what happened in 22 the event, isn't it? 23 <b>A. Certainly from what we've seen from Fred Michel's</b> 24 <b>emails, there was a lot of lobbying going on from our</b> 25 <b>side, yes.</b>  <p style="text-align: center;">Page 16</p> </p>

4 (Pages 13 to 16)

<p>1 Q. You could assist the Murdochs to this extent: that you 2 knew the personalities involved at least as well as them 3 and you could advise them in relation to Mr Osborne, 4 Mr Cameron and Mr Hunt in a way in which perhaps they 5 couldn't. Isn't that what you brought to the table 6 here?</p> <p>7 A. No, I don't think so. I think this was a very -- 8 I mean, first of all the strategy behind the bid was set 9 by News Corp and I had nothing to do with that and had, 10 again, no formal role. And secondly, this was 11 a quasi-judicial decision, which is nothing to do with 12 the personalities and preferences of particular -- of 13 the Prime Minister or the Chancellor of the Exchequer in 14 this case, or Mr Hunt before he took over from Dr Cable.</p> <p>15 Q. But you weren't so naive, were you, to believe that this 16 quasi-judicial decision would be carried out necessarily 17 wholly properly? You would naturally fear that personal 18 prejudices might intrude. You knew that, didn't you?</p> <p>19 A. No, actually, I -- maybe it was naive of me to think 20 that, you know, the procedure would be dealt with 21 properly, but I did believe that. I had no reason not 22 to until Dr Cable's comments came out in the December.</p> <p>23 Q. Okay. We do have one email, don't we, which you have 24 found. It's RMB2, under tab 4. You kindly disclosed 25 this one to us.</p> <p style="text-align: center;">Page 17</p>	<p>1 in to the same -- almost the same group of people, but 2 perhaps it was directly to me.</p> <p>3 Q. The text of the email is on the next page, 02607: 4 "Hunt will be making references to phone hacking in 5 his statement on Rubicon this week. He will be 6 repeating the same narrative as the one he gave in 7 Parliament a few weeks ago. This is based on his belief 8 that the police are pursuing things thoroughly and phone 9 hacking has nothing to do with the media plurality 10 issue."</p> <p>11 There's something gone wrong with the printing 12 there.</p> <p>13 A. That's a corruption there.</p> <p>14 Q. It's corrupted.</p> <p>15 "It's extremely helpful."</p> <p>16 So you are being told what the Secretary of State is 17 going to be saying in his Rubicon statement -- not, of 18 course, that the Secretary of State would have used that 19 code name, no doubt -- in his statement to Parliament. 20 Is that it?</p> <p>21 A. Yes.</p> <p>22 Q. That bit speaks for itself.</p> <p>23 "On the issue of privacy committee, he supports 24 the widening of its remit to the future of the press and 25 evidence from all newspaper groups on the regulatory</p> <p style="text-align: center;">Page 19</p>
<p>1 A. Yes, this email, yes. Tab 4, isn't it?</p> <p>2 Q. It's under tab 4.</p> <p>3 A. I have got it.</p> <p>4 Q. Before we look at it, I think people would be interested 5 to know how it is that this one email has survived and 6 others might not have done. Can you assist us?</p> <p>7 A. Well, in the period of between beginning of June 8 and July 17, when my BlackBerry was imaged, there were 9 certain emails on there and some text messages, and for 10 the purpose of the Section 21 notice for this Inquiry, 11 my legal team went through all those in order to 12 disclose anything that fell into the Inquiry, and this 13 was the only email that I had in that period that was 14 relevant to the BSkyB questions I'd been asked in my 15 witness statement.</p> <p>16 Q. Go first -- because we have to look at it in this 17 order -- to the bottom of page 02606, which is going to 18 be the first page of this document. We can see, at 19 16.29 hours on 27 June 2011 -- are you with me?</p> <p>20 A. I am, sorry, yes. It came on the screen --</p> <p>21 Q. Frederic Michel sends an email and it goes to just you, 22 I think, although it's not altogether clear. Is that 23 your understanding?</p> <p>24 A. I would be surprised if it just came to me. As you've 25 seen from the previous emails, they were always copied</p> <p style="text-align: center;">Page 18</p>	<p>1 regime. He wants to prevent a public enquiry. For 2 this, the committee will need to come up with a strong 3 report in the autumn and put enough pressure on the PCC 4 to strengthen itself and take recommendations forward."</p> <p>5 Was any of this news to you, Mrs Brooks?</p> <p>6 A. Yes, I think it was.</p> <p>7 Q. Was any of it surprising to you?</p> <p>8 A. I think -- I think it was -- it was -- it was news to me 9 and therefore could be surprising, yes. Probably.</p> <p>10 Q. The next paragraph:</p> <p>11 "JH is now starting to look into phone 12 hacking/practices more thoroughly and has asked me [the 13 pronoun 'me' is Mr Michel] to advise him privately in 14 the coming weeks and guide his and Number 10's 15 positioning."</p> <p>16 Do you know what that was about?</p> <p>17 A. Well, I think it speaks for itself.</p> <p>18 Q. Does that surprise you?</p> <p>19 A. Well, at the time -- the date of this email I think 20 is --</p> <p>21 Q. 27 June.</p> <p>22 A. -- 27 June, and at the time at News International, it 23 was a particularly -- I had a lot of my own concerns. 24 We'd just handed over the Harbottle &amp; Lewis file to the 25 MPS. It was probably my focus, more than anything else.</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 I obviously got this email in a million others.  2 I obviously read it at the time and I responded,  3 I think, to find out when the Rubicon statement was. So  4 I think the email and my response speak for themselves,  5 really.  6 Q. Your response was, at 17.20 hours – we have to go back  7 to the previous page:  8 "When is the Rubicon statement?"  9 A. Yes.  10 Q. And then the answer came back:  11 "Probably Wednesday."  12 A. Mm-hm.  13 Q. Can you assist us further from your memory as to  14 Mr Michel's dealings with Mr Hunt and/or Number 10 at  15 this time?  16 A. Probably not any further than the evidence that  17 James Murdoch gave, really. I mean, Fred Michel worked  18 for News Corp and not News International. So he didn't  19 work for me. So my interactions with him were not as  20 frequent, so I'm not sure I can add anything  21 particularly.  22 I know Fred Michel's own statement was that  23 sometimes he overstated his case, but for all I know,  24 this could be directly from Jeremy Hunt or, as he says,  25 Number 10 here. So I just don't know.</p> <p style="text-align: center;">Page 21</p>	<p>1 A. I said no, they were very happy to speak to each other.  2 Q. It's also suggested that James was passing blame on to  3 subordinates. Is that what was happening?  4 A. No.  5 Q. He wasn't?  6 A. What is the context of the Vanity Fair piece? I'm  7 sorry, I don't --  8 Q. You've seen the piece. It alleges that you were now  9 under pressure to please and protect not only Rupert but  10 also James, who had both taken the position they had no  11 idea what was going on inside their company, and  12 particularly James, passing blame on to subordinates.  13 Is that what was happening?  14 A. No.  15 Q. So you can't throw any light on the truth or otherwise  16 of the -- well, you are throwing light on the truth of  17 this piece. You say it's untrue?  18 A. It's saying that I'm the go-between between father and  19 son in an increasingly fraught situation, I think the  20 paragraph was.  21 Q. Relationship?  22 A. Relationship. So what I'm saying to you is that  23 I reported both to James and Rupert Murdoch and I would  24 talk to them both about the issues unfolding at  25 News International. James and I had offices next door</p> <p style="text-align: center;">Page 23</p>
<p>1 Q. You say in paragraph 28 of your statement, talking  2 generally of your time as CEO of News International,  3 that your time became increasingly occupied with the  4 phone hacking issue. Do you remember saying that?  5 A. I do remember. Sorry, where am I going to now?  6 Q. Paragraph 28 of your statement, page 02576. I'm  7 (inaudible) concerned with the detail of your  8 investigation or your knowledge, Mrs Brooks. Were  9 relations between Murdoch father and son increasingly  10 fraught as this issue developed?  11 A. I – I don't think it was between father and son. It  12 was – I mean, the situation was fraught.  13 Q. Because you've been described in one article --  14 Vanity Fair, this time -- as being the go-between in an  15 increasingly fraught father/son relationship. Is that  16 true?  17 A. Well, Vanity Fair spend a lot of time covering the  18 Murdoch family dynamics and they're just like any normal  19 family. They have dynamics and they change. I wouldn't  20 put any store by Vanity Fair.  21 Q. Maybe one shouldn't, but just listen to the question.  22 Were you the go-between in an increasingly fraught  23 father/son relationship?  24 A. No, they could speak to each other.  25 Q. I didn't hear that.</p> <p style="text-align: center;">Page 22</p>	<p>1 to each other. I would be talking to Mr Murdoch every  2 day. So if Vanity Fair want to couch that as  3 a go-between, then fine, but I don't accept the premise  4 of what they're insinuating.  5 Secondly, the Vanity Fair piece, whenever it came  6 out, is saying that James tried to – started to pass  7 blame onto subordinates and I'm not sure if that Vanity  8 Fair piece is – is it referring to James Murdoch's  9 testimony at the Select Committee or his testimony here?  10 I just don't even know when the Vanity Fair piece ran,  11 so it's difficult for me to answer the question without  12 some context.  13 Q. Can I ask about the police and your meetings with senior  14 police officers.  15 A. Yes.  16 Q. RMB1 again, this schedule you've prepared. It's towards  17 the back of it, I think. You've kindly provided  18 a schedule of meetings with senior police officers in  19 the Metropolitan Police Service.  20 A. Yes. Got it.  21 Q. The second page of that, it appears that you did not  22 meet with John Yates, Assistant Commissioner,  23 after December 2006. Is that, to the best of your  24 recollection, correct?  25 A. I – I'm – I don't think that's correct. I think I did</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 meet him, but I -- I mean, we hosted the -- we hosted</p> <p>2 the Police Bravery Awards every year, for a start, and</p> <p>3 I was always in attendance, and so I'm sure that he</p> <p>4 would have been there, so I really do not think these</p> <p>5 diary entries are the full picture.</p> <p>6 Q. There's likely to be a difference, Mrs Brooks, between</p> <p>7 a large function in which you might bump into people and</p> <p>8 any conversation might be snatched, and a dinner in</p> <p>9 a restaurant where they may only be a few of you and the</p> <p>10 conversation would be expansive.</p> <p>11 A. No, I do -- I do remember having a meeting with</p> <p>12 John Yates in Wapping, a lunch, around -- I think around</p> <p>13 the time of the cash for honours situation.</p> <p>14 Q. We're back in 2005 --</p> <p>15 A. Is that 2006? Oh right, okay. Well, then this diary</p> <p>16 may be correct then. I didn't see much of John Yates.</p> <p>17 Q. Are you able to say whether or not you discussed phone</p> <p>18 hacking issues with him?</p> <p>19 A. Because I don't remember a one-to-one meeting. I'm</p> <p>20 pretty sure, though, I attended the Police Bravery</p> <p>21 Awards right up until -- as you can imagine, right up</p> <p>22 until 2011, and he was always there. And I can't</p> <p>23 remember when the Guardian first -- I think the Guardian</p> <p>24 broke their story in July 2009, and there was a Police</p> <p>25 Bravery Awards -- it's usually in July. So I don't want</p> <p style="text-align: center;">Page 25</p>	<p>1 and, if you like, a well-oiled machine, there was always</p> <p>2 quite a lot of organisation for the Police Bravery</p> <p>3 Awards because the process continued for many months --</p> <p>4 sorry, started many months before, and he would have</p> <p>5 been involved in that, as I would.</p> <p>6 But mainly the issues of the day or introducing</p> <p>7 a new Commissioner or coming along with an update with</p> <p>8 a Commissioner.</p> <p>9 Q. Did you ever obtain information from him which formed</p> <p>10 the basis of a story in the Sun?</p> <p>11 A. No.</p> <p>12 Q. Did he put you in contact with police officers who could</p> <p>13 provide the basis and did provide the basis of a story?</p> <p>14 A. Well, I think most crime journalists would -- you know,</p> <p>15 I wasn't a crime journalist or a crime editor, but</p> <p>16 I think the process was that we would often ring</p> <p>17 Dick Fedorcio if we had a story that we'd got from our</p> <p>18 own sources that involved the Metropolitan Police and he</p> <p>19 was in a position to steer us away from it or give us</p> <p>20 a comment if we'd got it right. So there was a sort of,</p> <p>21 if you like, exchange of information, but it was -- in</p> <p>22 the way you put it, it sounded like he'd come into me in</p> <p>23 these meetings and give me a story. Sadly not.</p> <p>24 Q. Mr Wallis, of course, was an employee of</p> <p>25 News International until 2009. Were you aware of the</p> <p style="text-align: center;">Page 27</p>
<p>1 to absolutely rule out the fact that I may have</p> <p>2 mentioned it to him, because he was often around, but</p> <p>3 I don't remember a sitdown conversation where we</p> <p>4 discussed it at any length.</p> <p>5 Q. So you're admitting of the possibility --</p> <p>6 A. I'm saying that it might quite probably have happened,</p> <p>7 if those sequence of events -- if my memory serves me</p> <p>8 well and those are the sequence of events, that the</p> <p>9 Guardian story broke in July 2009, but I can't remember</p> <p>10 what date, and the Police Bravery Awards was afterwards.</p> <p>11 It could have been the other way around.</p> <p>12 LORD JUSTICE LEVESON: I think the Guardian story was 5th or</p> <p>13 6th, wasn't it?</p> <p>14 MR JAY: 8 July in the evening, and then into the print</p> <p>15 edition on the 9th.</p> <p>16 A. Right.</p> <p>17 Q. The meetings with Mr Fedorcio which were more frequent,</p> <p>18 what was the purpose of those meetings in your own</p> <p>19 words, Mrs Brooks?</p> <p>20 A. They would often be attended -- usually he would</p> <p>21 accompany a Commissioner or a senior officer, or if he</p> <p>22 came in on his own, it would be to discuss things with</p> <p>23 me and my crime editor and senior team and it could be</p> <p>24 a variety of issues.</p> <p>25 There was also -- although it was an annual event</p> <p style="text-align: center;">Page 26</p>	<p>1 nature of his relationship with police officers?</p> <p>2 A. No, only -- only insofar as -- I never worked directly</p> <p>3 with Mr Wallis, but when I took over his position as</p> <p>4 deputy editor of the Sun in 1998, I then assumed his</p> <p>5 responsibilities in owning, if you like, the Police</p> <p>6 Bravery Awards. So I was aware that he had started</p> <p>7 those in the previous year.</p> <p>8 Q. Okay, one general question about the nature of</p> <p>9 hospitality. It has to be a very general question. In</p> <p>10 terms of the nature of the hospitality you were</p> <p>11 offering -- I'm talking about lunches, dinners -- did</p> <p>12 you regard police officers really in the same way as</p> <p>13 politicians -- in other words, it was appropriate to</p> <p>14 take them to a restaurant of a certain stature or</p> <p>15 distinction -- or did you see there to be any difference</p> <p>16 between police officers and politicians?</p> <p>17 A. Well, there are definitely distinctions between the two.</p> <p>18 I think it would be fair to say that senior police</p> <p>19 officers were more inclined to want to go to a neutral</p> <p>20 venue like a restaurant, whereas a lot of meetings with</p> <p>21 politicians took place either in Wapping HQ or at party</p> <p>22 conferences or at Downing Street or various ministries.</p> <p>23 So that was in my experience.</p> <p>24 Q. Okay. The Inquiry has very little interest in the</p> <p>25 retired police horse, you understand -- that's September</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 2007 -- but I should ask you this question so we're</p> <p>2 clear about it: was there any exchange, as it were,</p> <p>3 between the work experience offered for Mr Fedorcio's</p> <p>4 son, which was also in the autumn of 2007, and the</p> <p>5 acquisition by you of this horse?</p> <p>6 <b>A. Absolutely not.</b></p> <p>7 Q. I move on to a different issue now.</p> <p>8 LORD JUSTICE LEVESON: Are you moving away from police</p> <p>9 officers, Mr Jay?</p> <p>10 MR JAY: Yes.</p> <p>11 LORD JUSTICE LEVESON: There's a balance here as well, isn't</p> <p>12 there? On the one hand, the need to keep an eye on the</p> <p>13 stories that are coming out, but on the other, an</p> <p>14 appropriate professional distance. Do you think there's</p> <p>15 a risk there?</p> <p>16 <b>A. I think it's always up to individual conduct in these</b></p> <p>17 <b>matters, and so I felt that the contact I had with</b></p> <p>18 <b>police officers, particularly commissioners and senior</b></p> <p>19 <b>police officers, in that kind of context was always</b></p> <p>20 <b>appropriate. I never saw any of my dealings with the</b></p> <p>21 <b>police -- I never saw any inappropriate either</b></p> <p>22 <b>conversations or -- take place.</b></p> <p>23 <b>So my experience of it was relatively good and</b></p> <p>24 <b>particularly at the Police Bravery Awards, where we</b></p> <p>25 <b>would come into -- the Sun journalism team would come</b></p> <p style="text-align: center;">Page 29</p>	<p>1 Q. I don't have the exact date of this article --</p> <p>2 LORD JUSTICE LEVESON: Published 13 July 2011, according to</p> <p>3 what's on the screen now.</p> <p>4 <b>A. Then no, sorry, I was still there.</b></p> <p>5 MR JAY: Do you know where the "shattered dad" that is</p> <p>6 referred to there got his information from?</p> <p>7 <b>A. I think we do, yes. Yes.</b></p> <p>8 Q. Where did he get his information from?</p> <p>9 <b>A. He got it from the fact that he -- his own child had</b></p> <p>10 <b>cystic fibrosis and he was given this information when</b></p> <p>11 <b>information was sought about cystic fibrosis. I'm being</b></p> <p>12 <b>very careful to try and not reveal his identity, that's</b></p> <p>13 <b>all, hence the hesitation, but I think we sort of -- we</b></p> <p>14 <b>know what happened.</b></p> <p>15 Q. That's all very vague, Mrs Brooks.</p> <p>16 <b>A. It is vague, but purposely so because I think when we</b></p> <p>17 <b>wrote this article -- I mean, although, like I say,</b></p> <p>18 <b>I was chief executive at the time, I remember the Sun</b></p> <p>19 <b>absolutely putting this together to refute</b></p> <p>20 <b>Gordon Brown's allegations, and we were incredibly clear</b></p> <p>21 <b>on it. We have an affidavit from the father where he</b></p> <p>22 <b>explains the story but I don't think that affidavit is</b></p> <p>23 <b>public, so I'm just being slightly hesitant not to</b></p> <p>24 <b>reveal his identity.</b></p> <p>25 Q. We're not concerned with his identity. That wasn't my</p> <p style="text-align: center;">Page 31</p>
<p>1 <b>into contact with police officers not just from the</b></p> <p>2 <b>Metropolitan Police but from all over the country, and</b></p> <p>3 <b>I always thought they were very useful for both sides</b></p> <p>4 <b>rather than inappropriate. But there is always a risk</b></p> <p>5 <b>that that is not the case.</b></p> <p>6 Q. The Gordon Brown cystic fibrosis story. You did have</p> <p>7 some involvement there, didn't you?</p> <p>8 <b>A. Yes, I did.</b></p> <p>9 Q. The piece in the Sun is under tab 29. It's part of the</p> <p>10 narrative, as it were. This is an article in 2006,</p> <p>11 I believe.</p> <p>12 "The Sun today exposes the allegation that we hacked</p> <p>13 into Gordon Brown's family medical records as false and</p> <p>14 a smear. We discovered the ex-PM's four-year-old son</p> <p>15 Fraser had cystic fibrosis months after his birth. We</p> <p>16 can reveal the source of our information was a shattered</p> <p>17 dad whose own son also has the crippling disease and he</p> <p>18 wanted to highlight the plight of sufferers."</p> <p>19 Is that true?</p> <p>20 <b>A. Yes. I think, Mr Jay, you said 2006? The article came</b></p> <p>21 <b>out in 2006 but this was written in 2011.</b></p> <p>22 Q. Yes, I think you're right there. The article</p> <p>23 is November 2006. Did you have any involvement in this</p> <p>24 article, although you were, of course, no longer editor?</p> <p>25 <b>A. No, I didn't. I think I may have even left the company.</b></p> <p style="text-align: center;">Page 30</p>	<p>1 question. The father's version is -- and we can see</p> <p>2 this in the article:</p> <p>3 "I have not had access to the medical records of the</p> <p>4 child at any time. All of which is the truth as I shall</p> <p>5 answer to God."</p> <p>6 Apparently is what his affidavit says, is it?</p> <p>7 <b>A. I think it's longer than that, but that will be part of</b></p> <p>8 <b>it, yes.</b></p> <p>9 Q. So how did the father get the information?</p> <p>10 <b>A. If I sort of put that back to reassure you -- we, at the</b></p> <p>11 <b>time, and again in July 2012, were absolutely satisfied</b></p> <p>12 <b>that the father had got the information from legitimate</b></p> <p>13 <b>means and we were very sure about that.</b></p> <p>14 Q. How had he got the information?</p> <p>15 <b>A. He'd got the information because his own child had</b></p> <p>16 <b>cystic fibrosis and he'd got the information, I should</b></p> <p>17 <b>say, through a very small -- it's not a small charity,</b></p> <p>18 <b>but there is a charity aspect to the Cystic Fibrosis</b></p> <p>19 <b>Society, and he got it slightly by involvement through</b></p> <p>20 <b>there.</b></p> <p>21 Q. What sort of involvement?</p> <p>22 <b>A. Mr Jay, I'm not going to tell you any more about the</b></p> <p>23 <b>source because I don't want to reveal his identity.</b></p> <p>24 Q. But you're not.</p> <p>25 <b>A. Well, I feel uncomfortable answering that because</b></p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)



<p>1 I think it could lead to his identity. You're asking me 2 where information came from and the source, and I think 3 they are matters that I have to respect in a source 4 coming to the newspaper. The main point of this issue 5 is Mr Brown accused the Sun of hacking into his son's 6 medical records to get this story and that wasn't true. 7 LORD JUSTICE LEVESON: It wasn't accurate? 8 A. No, sorry, it wasn't accurate. 9 LORD JUSTICE LEVESON: But actually that's quite important, 10 because it plays into something else that is concerning 11 me, which I am just going to dwell upon. If I've taken 12 a question from Mr Jay, it's just too bad. 13 Mr Brown was concerned that information which he 14 thought was private had entered the public domain, and 15 he felt that the way that that must have happened is 16 that the Sun had got hold of his records in some way. 17 That's what he was saying; is that right? 18 A. That's what he said in July 2011. 19 LORD JUSTICE LEVESON: Yes. Now, you knew that -- well, go 20 back one step. First of all, if you don't know anything 21 of how you got the story, it's not unreasonable, is it, 22 to believe that if private details of your child's 23 condition are being put into the public domain, they can 24 only have come from medical records? Because it's 25 diagnosis, it's medical detail. So it's not an Page 33</p>	<p>1 A. In the general point, I can absolutely see what you're 2 saying, sir, is correct, but this was not -- this was 3 a particular journey that the Sun had been involved in 4 since the beginning of the information coming into the 5 Sun newsroom and what happened after that and subsequent 6 to that. 7 LORD JUSTICE LEVESON: But if he never knew how you got it, 8 all you can say -- and you're entitled to say, "He's 9 just got it wrong." 10 A. He came to the wrong assumption in 2011. 11 LORD JUSTICE LEVESON: And that's absolutely fair. So the 12 issue is whether it's part of the culture of the press 13 that actually attack is the best form of defence. So 14 people don't just get it wrong; it's "false", in 15 capitals, and "a smear". Do you see the point I'm 16 making? 17 A. I do see the point you're making, but, sir, the context 18 of that article was written after Gordon Brown had -- 19 first of all, I think his first appearance in Parliament 20 since he stepped down as Prime Minister was to come to 21 the House and speak incredibly critically and, in some 22 cases, made wrong assumptions through his testimony to 23 the House, and then the second thing he did, he then 24 went on, I think, the BBC -- I can't remember -- to do 25 an interview with another wrong assumption that the Sun Page 35</p>
<p>1 unreasonable view for him to form? 2 A. He formed that view or came to that assumption in 2011. 3 In 2006 -- in November 2006, way before the Sun 4 published the story, we discussed the story directly 5 with the Browns before publication, and the first time 6 I'd heard that he had a concern of that nature was when 7 he gave an interview to the BBC in 2011. 8 LORD JUSTICE LEVESON: All right. 9 A. So it wasn't something that he felt at the time. 10 LORD JUSTICE LEVESON: Well, it may be, but until it went 11 into the public domain -- I'm not I'm not actually 12 focusing so much on that point. I'll come to the point 13 I want to make. You didn't explain to him, presumably 14 because you wanted to protect your source: "No, no, no, 15 we got all this from somebody whose son also has the 16 same condition, whose child has the same condition." 17 You just didn't discuss the source; is that right? 18 A. That is right, at the time. 19 LORD JUSTICE LEVESON: Now, my question. Would you look, 20 please, at the first line of the Sun article: 21 "The Sun today exposes the allegation that we hacked 22 into Gordon Brown's family medical records as false and 23 a smear." 24 My concern is whether it's fair to describe that 25 as -- it may be incorrect, but as "false and a smear". Page 34</p>	<p>1 had got the story from Fraser Brown's medical records, 2 and I think combining the two, if you like, attacks from 3 Mr Brown that had never ever been raised by him in any 4 shape or form with any of us at News International or 5 Mr Murdoch -- he never once mentioned press ethics or 6 practices in his -- in our entire relationship -- that 7 the Sun felt that it was a smear, that he was doing it 8 five years later for a particular reason, and I think 9 that's why they wrote the story that they did. 10 Now, I was chief executive at the time. I didn't 11 write the story but I'm defending their right to write 12 the story like that. 13 LORD JUSTICE LEVESON: All right. You've provided an 14 answer, but actually what you've demonstrated is that 15 the Sun believed -- and they may be right or wrong, 16 I don't know -- that Mr Brown had added two and two and 17 two and got 27, whereas in fact, if you took each one of 18 the incidents on their own, it may have been he may have 19 made a mistake, he may be wrong to reach the 20 conclusion -- that's all fair enough, entirely proper, 21 but it goes a bit further than that. 22 A. I accept that this story does, but if you imagine for 23 the Sun, the Sun -- and I know I keep mentioning this, 24 but the Sun has a trust with its readership. 25 LORD JUSTICE LEVESON: Yes. Page 36</p>

9 (Pages 33 to 36)

<p>1 A. And it's a very important trust and if that trust is 2 broken, then -- and a former Prime Minister had claimed, 3 I think harshly -- he'd come to the misconception that 4 we had got the story from Fraser's medical records. He 5 accepted -- and I think whoever broke the story -- 6 I can't remember who it was -- the Guardian, probably -- 7 that that was false, and there was a correction 8 subsequently published in the Guardian and I think the 9 Sun felt on that that they had to stand up -- because it 10 is a terrible accusation for a former Prime Minister to 11 make of a newspaper without being in possession of the 12 facts, that we had hacked into his medical records, and 13 I think that's why you are seeing the strong tone of the 14 rebuttal in the paper.</p> <p>15 LORD JUSTICE LEVESON: Well, I've asked the question. Thank 16 you.</p> <p>17 MR JAY: You're suffusing the Sun with virtue, Mrs Brooks. 18 Let's see how far I can get with this. Where did the 19 father's information come from?</p> <p>20 A. I'm not going to say, Mr Jay. 21 Q. But why not, Mrs Brooks? 22 A. Because if you knew where the father's information came 23 from, it would identify the source, and I'm not going to 24 do that. 25 Q. Are you saying that the information came from a charity?</p> <p style="text-align: center;">Page 37</p>	<p>1 MR JAY: Was the father paid for his time? 2 A. I think there was a donation made, but I can't be sure. 3 Q. To a charity, then? 4 A. I think he asked for it to be given to the cystic 5 fibrosis charity, which is why I have the charity in my 6 head, but I can't be sure. We can check with the Sun. 7 Q. How can the Inquiry assess whether or not the father's 8 source owed a duty of confidence without knowing not the 9 identity of the source but the nature of the duties that 10 source was discharging? Surely you can assist us to 11 that extent? 12 A. I can assist you to the extent, as I think Mr Lewis did 13 when he came here and you asked him a similar question 14 about the source for the MPs' expenses -- I can assist 15 you to the point that it was a legitimate source and in 16 any case, the way we conducted ourselves after receipt 17 of the information towards the sensitivity of that 18 information and how we handled that with Number 10 and 19 with the Browns was also exemplary.</p> <p>20 MR JAY: Was it exemplary, Mrs Brooks? Did you have the 21 express agreement of the Browns, freely given, to 22 publish this story about their son? 23 A. Absolutely. 24 Q. And so they were entirely relaxed about it? This was 25 personal information in relation to a four-year-old boy.</p> <p style="text-align: center;">Page 39</p>
<p>1 A. No, I'm not. I'm saying that because the source also 2 had a child with cystic fibrosis, he was aware and in 3 the -- it was the fact that he had a child with cystic 4 fibrosis is how he came to know.</p> <p>5 Q. That would indicate that the father might, at some 6 point, have been quite close to the Browns, perhaps in 7 a particular hospital, but it wouldn't, without more, 8 demonstrate how the father got hold of the relevant 9 information. Do you understand me? 10 A. I understand your point. 11 Q. Did he gain the information by subterfuge? 12 A. No, he didn't. 13 Q. Did he gain the information directly from the Browns? 14 A. No, he didn't. 15 Q. Did he gain the information from a third party? 16 A. I suppose you could describe it as that. 17 Q. Was that third party an employee of the NHS? 18 A. No, it wasn't.</p> <p>19 LORD JUSTICE LEVESON: Well, did the third party have a duty 20 of confidence to hold the information? Let's just go as 21 simple as that. 22 A. No, I don't think so. I'm sorry, without revealing the 23 source, the Sun was satisfied that the information came 24 from legitimate means and I felt that that covered all 25 those questions, but --</p> <p style="text-align: center;">Page 38</p>	<p>1 They were entirely satisfied that this could be placed 2 on the front page of the Sun in November 2006? Is that 3 your position? 4 A. I think you used the word "relaxed", and I think, to be 5 fair to the Browns, you have to consider how traumatic, 6 clearly, for any parent this was. 7 Q. What was, Mrs Brooks? 8 A. The diagnosis. 9 Q. And what about including it on the front page of the 10 Sun? Is that helping or not? 11 A. So Fraser Brown was -- 12 Q. Can you answer my question? 13 A. The question is ...? 14 Q. Obviously, there's the tragedy and pain of the diagnosis 15 but emblazoning this on the front page of the Sun is not 16 helping, is it? 17 A. Should I put it back to you, that if the Browns had 18 asked me not to run it, I wouldn't have done. There are 19 many examples where -- very tragic situations in 20 people's lives where people have asked me not to run the 21 story and I haven't and I wouldn't have done, and not 22 only was I -- they gave me permission to run it; it is 23 the only way we would have put that in the public 24 domain. 25 Q. Mr Brown's statement was:</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 "I can't remember of any way that the medical 2 condition of a child can be put into the public arena 3 legitimately unless the doctor makes a statement or the 4 family makes a statement." 5 A. Yes. 6 Q. Do you agree with that? 7 A. I agree with that, yes. 8 Q. Was the conversation you had with Mrs Brown or Mr Brown 9 regarding consent for this story? 10 A. I think in the period of time of receiving the 11 information and publishing the information, which is -- 12 which, by the way, went to all newspapers -- all 13 newspapers published it around the same day -- I spoke 14 to the Browns. I will have spoken probably to people 15 around them but I definitely had more of a communication 16 with Sarah Brown, as she was my friend, and I probably 17 discussed it with her more. 18 The sequence of events were: Fraser Brown was born 19 in July. I think the information came to the Sun in the 20 late October. I think the Browns' position at the time 21 was very much that they had had the tests confirmed, and 22 as Prime Minister and his wife, they felt that there 23 were many, many people in the UK whose children suffered 24 with cystic fibrosis. They were absolutely committed to 25 making this public and they were also -- one of the most</p> <p style="text-align: center;">Page 41</p>	<p>1 what had gone on. 2 You have to remember that the -- this is 2006. This 3 is only five years later that Mr Brown had ever said 4 anything -- that he was in any way concerned about my 5 behaviour, the behaviour of the Sun, how we handled it. 6 Indeed, after 2006, I continued to see them both 7 regularly. They held a 40th birthday celebration party 8 for me. They attended my wedding. I have many letters 9 and kind notes. Sarah and I were good friends. And so 10 I felt -- hence the story in the Sun in 2012 was quite 11 tough -- was that Mr Brown's recollections of that time 12 weren't the same as my own. 13 LORD JUSTICE LEVESON: Actually, I've been reading it in the 14 print version, our tab 29, but if one looks at it on the 15 screen, which everybody can do if you have a screen near 16 you, there's an interesting comparison, isn't there? On 17 the left-hand side, it talks about the falsity of the 18 allegation and the fact it's a smear, but on the 19 right-hand side, there is a statement, and that 20 statement simply tells the facts. In other words, 21 saying, "They've got it wrong." So you're actually 22 there putting the side of the story that is purely 23 defensive: 24 "We're very sorry. You, Mr Brown, have got it 25 wrong."</p> <p style="text-align: center;">Page 43</p>
<p>1 overwhelming memories of that time for me was the 2 Browns' insistence that when the story was published, 3 that we absolutely highlighted the positives in 4 association with the cystic fibrosis association. 5 Q. The story was published in November, when the child was 6 four months old -- I said four years old; that's 7 incorrect -- and before, I think, the diagnosis was 8 confirmed. Is that true? 9 A. No. I think -- and this is again from my conversations 10 back in 2006 with the Browns and people who advised 11 them -- I'm pretty sure we ran the story in the November 12 and the tests were confirmed some time in the October. 13 Q. When you spoke to Mrs Brown -- that's your evidence, 14 Mrs Brooks -- was it on the basis that: "Look, we've got 15 this story, we're going to run with it, let's see how we 16 can run with it in a way which is least harmful to you", 17 or something like that? 18 A. Absolutely not, and I think that -- as you've seen in my 19 witness statement, I was quite friendly with Sarah Brown 20 at the time. Very friendly. She'd been through a hell 21 of a lot already. I think my first thing I would have 22 said to both of them was -- would have been a much more 23 considerate and caring response to hearing the news 24 myself. I was very -- I was very sad for them. 25 I didn't know much about it and I wanted to find out</p> <p style="text-align: center;">Page 42</p>	<p>1 So you didn't need the subedited line in the first 2 paragraph in bold on the left-hand column, did you? 3 Anyway. 4 A. It's difficult -- I don't have the print version. 5 I only have the online -- 6 LORD JUSTICE LEVESON: You don't have the -- 7 A. I have the online version here. 8 LORD JUSTICE LEVESON: Do you not have on the screen the 9 version that has the Sun's statement? 10 A. I see it now. Sorry, yes. 11 MR JAY: Was there any correspondence with the Browns after 12 you published the first story in November 2006? 13 A. I saw them regularly after that and indeed discussed the 14 situation with them on many occasions. 15 Q. I move on to the Baby P story and the campaign against 16 the social workers involved, including at the top, of 17 course, Sharon Shoesmith, who was director of education 18 and children's services in Haringey. You remember all 19 of that, presumably? 20 A. I do, yes. 21 Q. Can I just give you the chronology so we understand the 22 dates. Baby P was killed on 3 August 2007. Two people 23 were convicted in relation to that crime on 11 November 24 2008 and Sharon Shoesmith was sacked by Mr Balls, the 25 then Secretary of State, on 1 December 2008. As it</p> <p style="text-align: center;">Page 44</p>

11 (Pages 41 to 44)

<p>1 happens that decision was subsequently held to be 2 unlawful by the Court of Appeal but that's a detail. 3 Did the Sun launch an e-petition calling for people 4 to be sacked? 5 <b>A. Yes.</b> 6 <b>Q. Was a similar e-petition launched in the Sunday Times?</b> 7 <b>A. I can't remember so.</b> 8 <b>Q. Okay. Did you telephone Mr Balls during the week</b> 9 <b>commencing 17 November 2008 telling him to get rid of</b> 10 <b>Sharon Shoesmith or they would "turn this thing on him"?</b> 11 <b>A. No.</b> 12 <b>Q. Did you have any conversation with Mr Balls at about</b> 13 <b>that time?</b> 14 <b>A. I'm sure I did, yes.</b> 15 <b>Q. What was the conversation about?</b> 16 <b>A. Just discussing the contents, I think, of the crime</b> 17 <b>review, or perhaps it was the Haringey's own review into</b> 18 <b>what had happened to Baby P, but certainly not that</b> 19 <b>sentence you've just said.</b> 20 <b>Q. Did you say anything which came close to that?</b> 21 <b>A. No.</b> 22 <b>Q. Was it the Sun's view that Sharon Shoesmith should be</b> 23 <b>got rid of?</b> 24 <b>A. It wasn't particularly Sharon Shoesmith; it was</b> 25 <b>a variety of people. I think in the eight months that</b> Page 45</p>	<p>1 <b>Q. I told you that. On live television it was, on</b> 2 <b>1 December 2008. But I'm looking two weeks beforehand,</b> 3 <b>the week commencing 17 November 2008. Did you have</b> 4 <b>a conversation with Mr Balls about Sharon Shoesmith?</b> 5 <b>A. Yes, it will have been discussed.</b> 6 <b>Q. It would have been or was discussed?</b> 7 <b>A. Yes, it was discussed.</b> 8 <b>Q. Was the purpose of the call specifically to discuss</b> 9 <b>Sharon Shoesmith?</b> 10 <b>A. No, it wasn't. It was to discuss the case and also to</b> 11 <b>try and understand why Haringey Social Services were</b> 12 <b>allowed to do their own review into their own conduct</b> 13 <b>over Baby Peter.</b> 14 <b>Q. During the course of the discussion you had in relation</b> 15 <b>to Sharon Shoesmith, did you indicate to Ed Balls that</b> 16 <b>you wanted her sacked?</b> 17 <b>A. Mr Jay, I didn't tell Ed Balls to fire Sharon Shoesmith.</b> 18 <b>It was very obvious from the coverage in our paper that</b> 19 <b>we had launched a petition because the government were</b> 20 <b>refusing to do anything about the situation. So yes,</b> 21 <b>I had conversations with Ed Balls. I think I also spoke</b> 22 <b>to the shadow minister, who I think was Michael Gove at</b> 23 <b>the time, but I can't quite remember that. We were —</b> 24 <b>I would have spoken to anybody, basically, to try and</b> 25 <b>get some justice for Baby P, which was the point of the</b> Page 47</p>
<p>1 <b>Baby P was under Haringey Social Services — Baby Peter,</b> 2 <b>sorry — he was seen by Social Services and NHS</b> 3 <b>officials in that time where he sustained the 50 or so</b> 4 <b>injuries that he died of in the end, but also more</b> 5 <b>importantly — and I'm not sure the public were allowed</b> 6 <b>to know this at this time, but in the review it was</b> 7 <b>revealed that the Social Services had allowed the</b> 8 <b>boyfriend, if you like, to live with Baby Peter, even</b> 9 <b>though he was on a charge of raping a two-year-old. So</b> 10 <b>there were serious failings, but it wasn't just Sharon</b> 11 <b>Shoesmith —</b> 12 <b>Q. We're moving well away from the subject matter of my</b> 13 <b>question, which was whether it was the Sun's wish to get</b> 14 <b>rid of Sharon Shoesmith. "Yes" or "no"?</b> 15 <b>A. I think we called for her and others to resign, yes.</b> 16 <b>Q. So you called for her to resign. Was that call the</b> 17 <b>subject matter of a conversation which you had with</b> 18 <b>Mr Balls?</b> 19 <b>A. I think he was well aware we'd called for the</b> 20 <b>resignation. It was all over the paper.</b> 21 <b>Q. Yes, but did you have a conversation with Mr Balls about</b> 22 <b>it specifically?</b> 23 <b>A. I can't remember when my call was with Mr Balls.</b> 24 <b>I think it was after he had — I think in the end he</b> 25 <b>ended up firing Sharon Shoesmith.</b> Page 46</p>	<p>1 <b>campaign.</b> 2 <b>Q. Yes, but the person who could deliver justice for Baby P</b> 3 <b>in this way was the person who could make the relevant</b> 4 <b>decision. That was Mr Balls, wasn't it?</b> 5 <b>A. Ed Balls obviously had influence on that decision and —</b> 6 <b>but the paper was the main form of lobbying —</b> 7 <b>Q. No, he was the decision maker, wasn't he? He was the</b> 8 <b>person who could effect the sacking by direct</b> 9 <b>instruction to Haringey. That's the correct position,</b> 10 <b>isn't it?</b> 11 <b>A. I'm just picking up that I think the premise of your</b> 12 <b>questioning is that — did I tell Ed because to sack</b> 13 <b>Sharon Shoesmith? And in fact in the newspaper, from</b> 14 <b>the day we broke — the day we covered the Baby P story,</b> 15 <b>it was very clear that that was the Sun's editorial line</b> 16 <b>on it, so Mr Balls was under no illusion that that was</b> 17 <b>the point of our campaign.</b> 18 <b>Q. Yes, and you also -- he was also under no illusion that</b> 19 <b>that was the point of your telephone call as well.</b> 20 <b>Isn't that the case?</b> 21 <b>A. No, the telephone call was in part the petition. We</b> 22 <b>were also — we also wanted to deliver the petitions to</b> 23 <b>Downing Street because nothing was moving on the</b> 24 <b>campaign, and we ourselves at the Sun were very</b> 25 <b>surprised by the level — I mean, 1.5 million of</b> Page 48</p>

12 (Pages 45 to 48)

<p>1 a percentage of a readership is a huge reaction. So it 2 will have been to feed back that. It would not just 3 be -- I don't think was -- it was a point of reference 4 because the editorial line of the Sun was very obvious 5 to Mr Balls. He only had to read the paper. 6 Q. If you were frustrated by his apparent inaction and you 7 had a mass of signatories on your petition, all the more 8 reason to bend Mr Balls' ear? Would you not agree? 9 A. Yes, but your premise of your question was: did I ring 10 up Mr Balls and say -- I can't remember how you put it, 11 but it was in a tone and a language that I wouldn't use, 12 but you said did I say, "Get rid of her or else", or 13 whatever you said, and I'm saying I did not say that. 14 The point of the campaign was pretty obvious to Ed Balls 15 because he only had to read the paper. I was actually 16 asking Mr Ed Balls for much more subtle information, 17 like the contents of the review that we weren't allowed 18 to see and the whitewash that I felt Haringey council 19 had done on their own review. 20 LORD JUSTICE LEVESON: I think we'd better give the 21 shorthand writer a break. Just five minutes. 22 (3.15 pm) 23 (A short break) 24 (3.24 pm) 25 MR JAY: Mrs Brooks, we're on to some general points now to Page 49</p>	<p>1 correct, isn't it? 2 A. I don't think sole responsibility -- 3 LORD JUSTICE LEVESON: No, the ultimate responsibility, 4 because you look to everybody else for advice and then 5 everybody looks towards you and you decide: "This is 6 what we're going to do." 7 A. Ultimately, everything that's published in the paper is 8 the editor's responsibility, yes. 9 MR JAY: Do you feel that that is a satisfactory state of 10 affairs, given that the editor is bound to be parti pris 11 in assessing the public good because the editor needs to 12 have an eye on matters such as circulation figures? 13 A. Well, that is a role of an editor. An editor's judgment 14 is part of their -- is a big part of their role. 15 Q. And holding public figures to account in your lexicon 16 would include exposing the private weaknesses of public 17 figures; is that right? 18 A. I think I was referring there more to campaigns, which 19 I discuss a lot in my witness statement. 20 Q. Yes, but I'm not discussing that. I'm discussing the 21 issue of exposing the private weaknesses of public 22 figures. You would regard that as completely within the 23 bound of the public good, wouldn't you? 24 A. Not necessarily, no. 25 Q. So when would you not expose the private weaknesses of Page 51</p>
<p>1 conclude your evidence, if that's okay. Paragraph 6, 2 please, of your second statement. You set out your 3 credo on accountability. Our page 02573: 4 "I've seen at first hand the importance of the press 5 as a means of holding politicians and other public 6 figures to account and of influencing policies for the 7 public good." 8 Would you agree that editors, subject only to any 9 review by the PCC, have sole discretion as to what 10 constitutes the public good? 11 A. No, not -- no, I don't. I think editors do have some 12 discretion. As we discussed earlier, that it is 13 a combination of reacting to the readers, understanding 14 the readers, but also putting issues and stories in 15 front of the readers for their reaction. So not sole 16 responsibility, no. There's a huge team at newspapers, 17 all of which contribute through conference, through 18 ideas. I think sole responsibility is not right. 19 Q. In terms of assessing what the public good is, that 20 resides with the newspaper and ultimate responsibility 21 resides with the editor. Are we agreed? 22 A. Yes. 23 Q. I think I was right in saying that in terms of this 24 particular assessment, subject only to review by the 25 PCC, responsibility resides with the editor. That's Page 50</p>	<p>1 public figures? 2 A. When there didn't seem to be a public interest in doing 3 so. 4 Q. And when would such circumstances arise? 5 A. Well, I think there are many stories that newspapers 6 haven't run about personal circumstances about public 7 figures. 8 Q. What are the sort of circumstances which would militate 9 against publication without, of course, giving us 10 details of individual stories which weren't published? 11 A. So if, perhaps, there had been no trust broken between 12 them and their constituents or -- where in fact, I think 13 you discussed yesterday, although that story was 14 published, maybe George Osborne could have argued that 15 it was before he became an MP. I mean, each editor's 16 judgment is their own in this. 17 Q. Which goes back to the point that it's a matter of 18 editorial discretion at the end of the day, isn't it? 19 A. You said "sole" and I just wanted to convey -- I'm sure, 20 you know, you're pretty au fait now with the workings of 21 a newsroom, but it is important to understand the 22 collective discussions that go on. 23 Q. Can I just take one particular campaign. Some would 24 say -- there are arguments both ways, but naturally no 25 view is expressed here. The murder of Sarah Payne and Page 52</p>

13 (Pages 49 to 52)

<p>1 Sarah's Law, which featured in the News of the World for 2 a number of years.</p> <p>3 A. Yes.</p> <p>4 Q. Is right that the News of the World published the names 5 and photographs of sex offenders in order to "protect 6 other children from them"?</p> <p>7 A. Correct.</p> <p>8 Q. Was that the editorial decision of someone like you?</p> <p>9 A. Yes, it was.</p> <p>10 Q. What do you say to the criticism made by the 11 Chief Constable of Gloucestershire that this was grossly 12 irresponsible journalism?</p> <p>13 A. Well, I disagreed with it at the time.</p> <p>14 Q. For what reason?</p> <p>15 A. Because I felt that although there were some aspects to 16 the campaign that -- and there's always risk with any 17 kind of public interest journalism and there's always 18 risk with campaigns -- although there were some issues 19 with the campaign, I was -- I think the mechanic, in 20 a way to try and explain to the public what the point of 21 the campaign was, was effective, and I think there were 22 about 13 or 14 pieces of legislation brought in 23 subsequently on the back of it.</p> <p>24 Q. Why did you need to publish the names and photographs of 25 known sex offenders in order to bring home what was</p> <p style="text-align: center;">Page 53</p>	<p>1 they thought was the situation and what was the 2 situation.</p> <p>3 Q. Why couldn't you just explain it to your readers in 4 clear and simple language? Why sensationalise it and 5 create the obvious risk of reprisals?</p> <p>6 A. Well, actually before we did it, having looked at 7 Megan's law, there was very, very limited -- there is 8 very limited vigilanteism. I wasn't predicting those 9 reprisals and I felt it was the best way to highlight 10 the central point of the campaign.</p> <p>11 Q. Were there any reprisals?</p> <p>12 A. There were two that are written about.</p> <p>13 LORD JUSTICE LEVESON: Does that include the paediatrician?</p> <p>14 A. It does, sir, yes.</p> <p>15 MR JAY: The natural and foreseeable consequence of 16 a sensationalised campaign, wouldn't you agree, 17 Mrs Brooks?</p> <p>18 A. No, I think the -- I don't think anyone could have 19 predicted the paediatrician situation. And secondly, 20 I think on Paul's Grove estate, I think the residents 21 were quite shocked to discover that Victor Burnett had 22 been living there unchecked when his last words in 23 prison were: "I'm going to offend again", although 24 again, I didn't predict the outcome.</p> <p>25 Q. It's been a recurring theme in the questioning over the</p> <p style="text-align: center;">Page 55</p>
<p>1 otherwise a legitimate point?</p> <p>2 A. Because it was -- it was the point about information. 3 When Sarah Payne went missing, I was surprised that the 4 police team around the inquiry were pretty sure who they 5 thought the perpetrator might be because he was 6 a convicted paedophile living in the community, who had 7 just been released, having abducted another 8 eight-year-old girl in almost identical circumstances, 9 and it was news to me that convicted paedophiles of that 10 serious nature were allowed to live unchecked in the 11 community and parents didn't have any information on 12 that, and when I checked, back in America, after the 13 murder of Megan Kanka in 1994, President Clinton had 14 brought in a Megan's law, which had been working very 15 well, and so that's why I thought the mechanic was 16 right.</p> <p>17 Q. One can understand the argument to this extent. Let's 18 agree that the criminal law might need to be 19 strengthened. Why is it necessary, as part of that 20 legitimate campaign, to publish the names and 21 photographs of known sex offenders?</p> <p>22 A. Because in 2000 when we did it -- and I think it was 23 over a period of just two weeks -- it was a way of 24 highlighting the central issue of the campaign to try 25 and explain to the readers the huge gap between what</p> <p style="text-align: center;">Page 54</p>	<p>1 course of the day that I put to you a proposition which 2 might seem obvious as a matter of common sense and you 3 reject it each time. I'm going to try again with this 4 one. Is it not evidently inflammatory to publish in the 5 News of the World the names and photographs of known sex 6 offenders, with the foreseeable consequence that there 7 might be physical violence?</p> <p>8 A. Well, if you published it on the basis that you knew 9 that that would happen, yes. But it was not the 10 intention. The incidents I can explain, as I've tried 11 to. The fact is that it was a very serious -- there 12 were very serious loopholes that needed to be closed and 13 it was a bold -- some people disagreed with it, some 14 people agreed with it in terms of press, but 98 per cent 15 of the British public continue to agree with the 16 campaign probably up until this day.</p> <p>17 Q. It might not have been your motive, Mrs Brooks, but it 18 was the natural and probable consequence of your 19 actions, wasn't it?</p> <p>20 A. No.</p> <p>21 Q. If it wasn't, it means that you banished from your mind, 22 I would suggest to you, that which would be patently 23 obvious to anyone else and which ought to have been 24 obvious to an editor exercising your position, role and 25 power. Would you not agree?</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 A. No, I won't agree because I did not predict there was 2 going to be a riot in Paul's Grove and I didn't 3 predict that somebody, a member of the public, would 4 mistake a paedophile for a paediatrician. I don't think 5 anybody could have predicted that.</p> <p>6 Q. In many things, though, Mrs Brooks, one can't predict 7 the exact sequence of events which would lead to an 8 outcome, but you could certainly predict the outcome in 9 general terms. What I'm suggesting to you is that it's 10 plain as a pikestaff that this sort of outcome would or 11 at least might arise. Would you not agree?</p> <p>12 A. No, and you have the benefit of hindsight, which 13 I didn't have at the time. I was merely constructing a 14 very bold campaign in order to change the sex offenders 15 act of 1997.</p> <p>16 Q. Not just bold, Mrs Brooks, but sensationalised, designed 17 to inflame and designed to improve the standing of you 18 and the standing of the News of the World with those 19 crude objectives in mind. Is that not true?</p> <p>20 A. Mr Jay, you seem to have taken the opinion of -- the 21 Guardian, I think, had that at the time. I disagree 22 with you. It is not my opinion, and I'm not going to 23 agree with you.</p> <p>24 Q. Okay.</p> <p>25 LORD JUSTICE LEVESON: Let me make it clear that I have Page 57</p>	<p>1 you're moving on to your wider point.</p> <p>2 A. Yes.</p> <p>3 Q. You say in the second line:</p> <p>4 "It is one thing to be a passionate advocate of 5 a free press but if you seek to defend an inaccurate 6 free press, you lose the moral high ground."</p> <p>7 Are you intending to say there that there are some 8 aspects of our free press which might give rise to 9 criticism because our free press can be inaccurate?</p> <p>10 A. I think that -- and you've discussed this in the first 11 module of the Inquiry -- that when a newspaper gets it 12 wrong -- one of the biggest complaints I used to get, 13 not necessarily about my own newspaper but about the 14 press in general, was the prominence of apologies when 15 an inaccuracy had taken place, and that's what I'm 16 referring to. The page 37, one paragraph type thing.</p> <p>17 Q. In some respects -- and this is perhaps an ironical 18 aspect of your evidence. In the course of the day, I've 19 put to you stories which are said to be reliably 20 sourced, whether they are in the Times or Vanity Fair or 21 elsewhere, and very often you've said, "It's untrue", 22 but that, in a funny sort of way, is the sort of debate 23 we've been having at this Inquiry. If your evidence is 24 right, that is, so often sources don't stand up, based 25 on myth or half truth or a garbled version of the truth. Page 59</p>
<p>1 absolutely no concern about the policy objectives of 2 a campaign that News of the World or anybody else wishes 3 to run. That's what freedom in our society means. 4 I have no problem about that at all. The only question 5 I might ask, following up on Mr Jay's question, is: if 6 you had appreciated that the public might react in the 7 way in which it did in the two incidents, do you think 8 you would have rethought whether that aspect of the 9 campaign should be run?</p> <p>10 A. I do have some regrets about the campaign, particularly 11 the list of convicted paedophiles that we put into the 12 paper, because I felt that we'd made some mistakes by 13 just going on an appearance on the Sex Offenders Act, 14 which wasn't necessarily the right criteria. However, 15 I still thought that the mechanic that we used was the 16 right thing to do.</p> <p>17 LORD JUSTICE LEVESON: Right.</p> <p>18 MR JAY: Paragraphs 99 and 100 of your second statement, 19 02589, when you refer to a wider point. Do you remember 20 that?</p> <p>21 A. What paragraph, sorry?</p> <p>22 Q. Paragraph 99.</p> <p>23 A. Yes.</p> <p>24 Q. You moved off the Andy Coulson issue and you have 25 scotched the myth there, do you follow me, and then Page 58</p>	<p>1 Do you see the irony there?</p> <p>2 A. Yes, I do.</p> <p>3 Q. What do you think the reason for it all is?</p> <p>4 A. Well, Mr Jay, today you've put to me quite a few, shall 5 we say, gossipy items, for want of a better word --</p> <p>6 Q. Same sort of stuff one reads or did read in the News of 7 the World --</p> <p>8 A. And the Sun.</p> <p>9 Q. -- and continues to read in the Sun. Isn't that true?</p> <p>10 A. Yes, but we're not in a tabloid newsroom now, are we?</p> <p>11 Q. No, we're not.</p> <p>12 A. We're in an Inquiry. So you put a personal few 13 things -- my personal alchemy, my -- did Rupert Murdoch 14 and I swim? Where did I get the horse from? Did 15 Mr Murdoch buy me a suit? The list is endless and I've 16 had to refute a lot of those allegations because -- 17 "allegations" is overstating the case -- they're wrong. 18 But I do feel that that is merely a systematic issue 19 that -- you know, I think a lot of it's gender-based. 20 I think that my relationship with Mr Murdoch -- if I was 21 a grumpy old man of Fleet Street, no one would write the 22 first thing about it, but perhaps otherwise I get a lot 23 of this criticism and gossip. But I wasn't complaining 24 and I wasn't making -- it would be the height of 25 hypocrisy for that last paragraph to mean that. All Page 60</p>

15 (Pages 57 to 60)



<p>1 I was saying is that in my experience as a journalist,  2 it is one of the biggest complaints I get where people  3 say that the apology never matches the inaccuracy.  4 Q. The systematic issue you referred to may not relate to  5 you, although I understand naturally you would have  6 particular concerns in relation to yourself. The  7 systematic issue as regards inaccuracy may be a function  8 of the commercial pressures the press is under, its  9 reliance on sources which do not always stand up, its  10 tendency to rely on stories which ring true but which  11 don't happen to be true, and finally the story itself  12 being more important than the truth. In microcosm  13 today, we have seen demonstrated the sort of phenomenon  14 which has occupied the life of the press for decades in  15 this country. Is that fair or not?  16 A. I don't think it's fair and I don't think any journalist  17 in the room would agree with the final summing up of  18 that statement, where you say the story's more important  19 than the truth.  20 Q. Are there other aspects of the culture, practice and  21 ethics of the press which you're looking at in  22 paragraph 99, such as harassment and intrusion, or are  23 these issues which you would either prefer not to  24 address or don't think are particularly important?  25 A. Well, no. Of course I think they're important. I mean,  Page 61</p>	<p>1 a difficult year and -- but a lot of the questions that  2 I've had from Mr Jay I felt concentrated on quite  3 a trivial side. I was happy to discuss them, but it was  4 all -- you know, I'm not sure it helps this Inquiry  5 whether Mr Murdoch bought me a suit or not, or I went  6 swimming with him.  7 LORD JUSTICE LEVESON: What might help is the nature of the  8 relationship and the influence that it generates, and  9 they're all bits and pieces. I wasn't asking you to  10 complain, because you've said in terms that it would be  11 hypocritical of you to do so in the light of your past  12 experience, but because I'm trying to find the way  13 through the various modules, including the political  14 one, I wanted to give you the opportunity of saying  15 anything you wanted to say on the subject.  16 A. Well, I think -- I think on the -- on the politicians,  17 I do think much has been made of cosy relationships and  18 informal contact, and I believe that if journalists meet  19 politicians, the -- it's going to be incredibly hard to  20 be -- the journalist to be transparent about that or be  21 forced to be transparent because often they are exactly  22 the ways that we get information. So if you see an MP  23 for a drink and then have to print your schedules the  24 next day, that's quite difficult.  25 On the other hand, I understand from this government  Page 63</p>
<p>1 I'm happy to discuss them, but just for the purposes of  2 this module, which was meant to be about the discussion  3 of the appropriate relationship between press and  4 politicians, I haven't gone into them in my witness  5 statement.  6 Q. Okay.  7 LORD JUSTICE LEVESON: I understand that, Mrs Brooks, but  8 one couldn't have listened for the day -- and indeed  9 read the material that has been published and written  10 about you that forms this lever-arch file -- without  11 wondering a little bit about the extent to which the  12 press have intruded rather beyond your public position  13 into your private life, and I wonder whether you have a  14 comment, speaking with all the experience that you have  15 as an editor of the News of the World and the Sun, as to  16 the extent to which the press does now get further and  17 further into issues of privacy?  18 A. Well, look, for a start, I consider myself to be  19 a journalist and therefore I -- as I said to Mr Jay, it  20 would be, I think the height of hypocrisy for me to  21 complain. However, I have had those complaints from  22 people in my career as journalism and I've always tried  23 to understand and always tried to use my judgment to  24 where that line fell.  25 As to my own situation, well, you know, it's been  Page 62</p>	<p>1 that they have improved their transparency from their  2 part, and so I suppose it was to urge you that actually  3 there really shouldn't be -- there shouldn't be, if  4 everyone's individual contact is correct -- I have  5 a never compromised my position as a journalist by  6 having a friendly relationship with a politician. I've  7 never known a politician compromise their position  8 particularly with their friendship with me or with  9 another executive.  10 So I'm not saying the system is perfect, far from  11 it, but a review and understanding of the current laws  12 might be a start, or enforcing of the current laws,  13 before we put any more restrictions into it.  14 LORD JUSTICE LEVESON: In relation to a press and the  15 politicians, I don't know that it's a question of law.  16 A. I'm talking about the Ministerial Code, which is  17 changing all the time, and it changed in July last year.  18 LORD JUSTICE LEVESON: But you said to me before lunch --  19 when I asked you: can you understand why it might be  20 a matter of public concern that the very close  21 relationship between journalists and politicians might  22 create subtle pressures on the press, who have  23 a megaphone on the politicians who have the policy  24 decision, you agreed that you could understand that.  25 A. I could understand your point very clearly, sir, because  Page 64</p>

16 (Pages 61 to 64)

<p>1 I think in every walk of life and every kind of 2 relationship you have, there are subtle pressures. 3 I think that's human nature. And it is up to 4 individuals' conduct and how you respond to those 5 pressures. So I accept what you're saying as a fact, 6 but I do think that both the press and politicians need 7 to make sure that they have their professional life in 8 front of anything else so they don't compromise. 9 I mean, the big point about sort of 10 a prime minister -- if a prime minister ever had put 11 a friendship or a relationship or a cosiness with 12 a media group before their duties to the electorate, 13 then that would be a terrible failing. 14 LORD JUSTICE LEVESON: Of course. But it might be that 15 they're convinced that it is consistent with their 16 duties to the electorate. In other words, the nature of 17 the relationship is such that they become honestly and 18 completely convinced, because of the respect they hold 19 the people that they're dealing with, who may be their 20 friends -- and therefore they're not doing anything that 21 is improper but they are slightly, perhaps, less guarded 22 with people in the press, particularly those who may be 23 their friends, than they will be when they know there's 24 a lobby group coming. The example I gave to Mr Coulson 25 yesterday was from the coal industry, and then there's</p> <p style="text-align: center;">Page 65</p>	<p>1 A. And that would be -- that's correct in terms of business 2 and commercial interests, which is, I think, where the 3 coal manufacturing comes in. All I would say -- I'm not 4 disagreeing with that point -- is that from 5 a journalist's perspective, you're not trying to get to 6 see a politician for your own personal or even your 7 company's commercial interests; you're trying to gather 8 information -- to put it, you know, at its lowest, 9 you're trying to get a good story. 10 LORD JUSTICE LEVESON: But you might be doing it for your 11 commercial considerations. We've talked enough about 12 the BSKyB bid or the anti-bSkyB bid. It doesn't really 13 matter which. That's where the whole thing gets just 14 a little bit fuzzy, doesn't it? 15 A. I have never known anything like the anti-Sky bid 16 alliance and indeed our natural reaction to it -- but 17 I've never heard of every media group in the country and 18 British Telecom and the BBC getting together against one 19 commercial bid. 20 LORD JUSTICE LEVESON: You could take another example. You 21 could take the example of the meeting in 19 -- I have to 22 get the year right. 23 A. '80? 24 LORD JUSTICE LEVESON: The meeting between Rupert Murdoch 25 and Mrs Thatcher, thank you, about the takeover of the</p> <p style="text-align: center;">Page 67</p>
<p>1 a lobby industry from Greenpeace to talk about a new 2 colliery. That's a part of our process that different 3 interest groups get the opportunity to make their point. 4 But I don't suppose many colliery owners get the 5 opportunity to make as many points as the most senior 6 journalists get to make, and the colliery owners don't 7 quite have the same ability to provide -- if I use the 8 word "something in return", I don't want you to 9 misunderstand me. I'm not saying there's a Faustian 10 bargain necessarily, but it is, as I think has been said 11 at this Inquiry before, rather more subtle than that. 12 It's just a recognition that actually, if two people -- 13 a journalist on the one hand and a politician on the 14 other -- are on the same page and therefore support each 15 other, they might generally support each other. Not 16 improperly, not because they've made a deal, not because 17 they've been given cash or anything like that, but 18 because people can be persuaded. 19 Now, that may be fair enough, but the question is 20 how one can ensure there is sufficient openness and 21 transparency about that so that everybody is satisfied, 22 in this day of mass media communication, that all 23 decisions are being made openly and transparently, 24 without influence that people don't know about. That's 25 my point.</p> <p style="text-align: center;">Page 66</p>	<p>1 Times. I'm not suggesting that that's improper. I'm 2 not reaching any conclusion about any of it, but it is 3 another example. The anti-bSkyB bid alliance not merely 4 had the ability to lobby; it had the ability to use its 5 press interests. News International had the ability to 6 use its press interests. 7 A. Well, we didn't, actually, but yes. 8 LORD JUSTICE LEVESON: Whether you did or you didn't is not 9 my point, as you understand. 10 A. Yes, I do. 11 LORD JUSTICE LEVESON: So it's a question of ensuring for 12 the public that that pressure, the megaphone on the one 13 hand and the policy decisions on the other, does not get 14 out of hand. 15 A. That's correct, but I really do believe -- I know I keep 16 going on about it, but it's the ordinary people's views 17 that make a newspaper powerful, and if I can just give 18 you one example, where the Daily Mirror ran a very good 19 campaign that chimed with the readership at the 20 beginning, anti the war in Iraq. I think it was called 21 "Not in our name". And the Sun, being pro-military, 22 always kept a very sort of supportive -- you know, 23 backing our troops on the ground. Once the war started, 24 the Mirror continued with the campaign, and I think ran 25 a headline saying, "Why Mirror readers are wrong", and I</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 think it's in Piers Morgan's book that I was asked to 2 read again for this inquiry — he talks about how the 3 circulation of the Mirror plummeted because in fact he'd 4 continued to drive an editorial line in the paper which 5 was against the readership, and they reacted pretty 6 swiftly.</p> <p>7 I accept that's an extreme example and you were 8 asking me about subtleties in these kind of pressures —</p> <p>9 LORD JUSTICE LEVESON: And that's why we spoke earlier 10 before about: is it responsiveness or leadership? And 11 there's a bit of both.</p> <p>12 A. There is absolutely both. I mean, on Sarah's law, for 13 example, although many people questioned the mechanic — 14 and I completely understand that, it was 15 controversial — the fact is that it was again — I put 16 a piece of information in front of the readers that 17 I found astonishing when I heard it, was that, for 18 whatever reason in the system, that convicted 19 paedophiles could live in the community unchecked, and 20 that was something I just didn't know and I presented it 21 to the readers in the way I did, and so that was 22 a situation of me putting something in front of them. 23 However, I did know that they were incredibly moved by 24 what happened to the Payne family from their reactions 25 earlier on, so I knew they would be responsive to it.</p> <p style="text-align: center;">Page 69</p>	<p>1 would expect, widely reported, and we would be very 2 grateful indeed for the opportunity to make a short 3 opening statement.</p> <p>4 LORD JUSTICE LEVESON: Yes. In principle, I have no 5 objection to that, Mr White, except I'd need to know 6 where it was going to get me to. I mean, I did ask some 7 weeks ago whether anybody wanted to make opening 8 statements and indeed I think at one stage the Guardian 9 wanted to, and then decided that it wasn't necessary. 10 I'm just a little bit troubled that once I open the door 11 again, then everybody will decide that it's about time 12 they marched through. In one sense, I don't mind that 13 either, except that I have a timetable to deliver and 14 I'm going to deliver it.</p> <p>15 Have you discussed that with any of your fellow core 16 participants?</p> <p>17 MR WHITE: I haven't, but may I make this observation: that 18 there was little attention on anybody else and their 19 interaction with politicians in Mr Jay's opening, and 20 therefore I suspect that our desire to say something in 21 response may be somewhat more pressing than other 22 parties'.</p> <p>23 LORD JUSTICE LEVESON: I understand the point. All right, 24 briefly you have that opportunity.</p> <p>25 MR WHITE: Thank you very much.</p> <p style="text-align: center;">Page 71</p>
<p>1 LORD JUSTICE LEVESON: It's all a bit like that, isn't it?</p> <p>2 A. It is. It makes it very difficult.</p> <p>3 LORD JUSTICE LEVESON: Yes. Thank you. Is there anything 4 else that you want to add on the subject?</p> <p>5 A. No, that's fine. Thank you.</p> <p>6 LORD JUSTICE LEVESON: Right. All right, thank you.</p> <p>7 A. Thank you.</p> <p>8 LORD JUSTICE LEVESON: Right. There's something else we 9 have to deal with, but I'll let Mrs Brooks and anybody 10 who wants to leave. (Pause).</p> <p>11 Right. Well, we have a little time to continue the 12 issues that were raised by Mr Sherborne. I appreciate 13 he's not here, but he will have the opportunity of 14 reading what everybody says and replying shortly when we 15 next get an opportunity. As long as we're working hard 16 and keeping to the timetable, I don't mind.</p> <p>17 Right, Mr White, do you want to start?</p> <p>18 Response to Mr Sherborne's Application</p> <p>19 MR WHITE: May I? May I also raise one other matter that 20 Mr Jay's mentioned to you, which is on behalf of 21 News International. We would greatly appreciate an 22 opportunity to make a short opening statement on 23 Module 3 on Monday morning. Mr Jay's opening of this 24 module was focused to a very large extent on 25 News International and its conduct and that was, as one</p> <p style="text-align: center;">Page 70</p>	<p>1 May I then turn to Mr Sherborne's application on 2 Wednesday afternoon? Transcript pages 74 to 5, 3 Mr Sherborne sought a direction. It was be a 4 application of which there had been no advance warning.</p> <p>5 LORD JUSTICE LEVESON: Yes, I know. That's one of the 6 reasons why I was very happy to give everybody the 7 chance to think about it. I'm the only one that should 8 get things thrown at them without knowledge. You should 9 at least have some forewarning. It's one of the perils 10 of judicial life. Yes?</p> <p>11 MR WHITE: It's a very minor grumble. The application was, 12 as I understand it, for a direction that the newspaper 13 core participants should answer two questions in 14 relation to the Operation Motorman data, if I can use 15 that compendious term. The first we question was what 16 happened to the journalists who used Mr Whittamore's 17 services, in terms of whether they were disciplined or 18 any other action. The second was what steps had been 19 taken to identify whether any information from that data 20 is still being retained or used, and the closing words 21 Mr Sherborne used were: "If it is still being used, this 22 must stop."</p> <p>23 May I say first of all we were surprised that that 24 application was made more than five months after 25 News International filed its very detailed evidence in</p> <p style="text-align: center;">Page 72</p>

18 (Pages 69 to 72)

<p>1 relation to the Operation Motorman data. That was in 2 the second witness statement of Pia Sarma, the editorial 3 legal director of the Times, which was read into the 4 record of the Inquiry without objection or response from 5 Mr Sherborne's clients, I think five months and two days 6 ago.</p> <p>7 The first question, what happens to the journalist, 8 seems to us to break down logically into two questions 9 in fact. Firstly, what happened to them back in 2006, 10 when the report "What price privacy now?" was published, 11 and secondly, what might have happened to them at any 12 later stage.</p> <p>13 Sir, the first question or the first part that, 14 namely what happened in 2006, proceeds, I think it's 15 necessary to remind the Inquiry, on a false premise. 16 The false premise is that the individual journalists in 17 question were either identified or identifiable from 18 "What price privacy now?". In fact, that report, when 19 published in December 2006, simply contained a table 20 which set out names of publications --</p> <p>21 LORD JUSTICE LEVESON: Yes, I have the point.</p> <p>22 MR WHITE: Yes.</p> <p>23 LORD JUSTICE LEVESON: So they couldn't do anything then and 24 indeed they contended that they were wrongly identified 25 anyway. At least certain of the entries in relation to</p> <p style="text-align: center;">Page 73</p>	<p>1 MR WHITE: All of what I'm saying is essentially by way much 2 reminder. Ms Sarma also explained why the unidentified 3 journalists may well have not have been aware of 4 any illegality and what I did want to remind you of was 5 that the vast majority of the Operation Motorman data in 6 relation to my clients consisted simply of ex-directory 7 telephone numbers and our evidence was that those were 8 obtainable through legitimate sources. Indeed, we 9 exhibited some websites providing exactly that service 10 which continue to operate, and one of them claims with 11 the approval of the ICO.</p> <p>12 So that's one point about whether there was any 13 actual wrongdoing disclosed even against the 14 unidentified journalists but Ms Sarma went further and 15 explained that without knowing the particular 16 transaction, it is was impossible to see whether there 17 was a public interest defence -- an apparent offence or 18 prima facie offence -- under section 55. She did so not 19 in the abstract but by exhibiting at PS6 certain stories 20 which we linked to particular lines in the data, where 21 we said there was a public interest. It's 22 a confidential exhibit but it's in evidence. We didn't 23 do the exercise for every line but doing it for some was 24 an indication of how difficult it is to oversimplify the 25 problem and suggest that any journalist using the</p> <p style="text-align: center;">Page 75</p>
<p>1 clients of yours were challenged.</p> <p>2 MR WHITE: Yes.</p> <p>3 LORD JUSTICE LEVESON: So I understand that. Yes?</p> <p>4 MR WHITE: You have in mind the Sunday Times was said to 5 have 52 transactions involving seven journalists. When 6 we asked who those were and what they were, it was 7 "corrected" to four transactions involving one 8 journalist.</p> <p>9 But we also expressly asked for the information to 10 enable us to investigate it and were refused it, and all 11 that is set out in detail in Pia Sarma's witness 12 statement. The MOD reference is MOD10049133, 13 particularly at paragraph 12. I don't think we need to 14 get it up on the screen. But we couldn't do anything in 15 2006.</p> <p>16 Ms Sarma's witness statement also addresses whether 17 we could have done anything from our own records to try 18 and see whether we could match the table and she 19 explains later in the witness statement, I think at 20 paragraph 16, why, given the age of the data -- which, 21 as you may recall, by December 2006 was between about 22 four and seven years old already -- that simply wasn't 23 practical.</p> <p>24 LORD JUSTICE LEVESON: I remember. I had forgotten, but 25 I remember now, yes.</p> <p style="text-align: center;">Page 74</p>	<p>1 services should have been disciplined.</p> <p>2 Then one asks: should we have done something at 3 a later date? I suppose the first question is when, but 4 let us take the example of you when all the participants 5 obtained, through the Inquiry, the relevant data. The 6 position at that stage, sir, is the transactions were by 7 then at least nine years old and since some of them were 8 probably much older, it would have been difficult at 9 that stage to look into them. More difficult.</p> <p>10 More importantly, I think we had only one or perhaps 11 two journalists named in the data still in employment at 12 any of our titles. But we also took the view that to 13 take disciplinary action against employees for 14 transactions more than nine years old would have been 15 completely indefensible in employment law terms and they 16 were far too stale to start disciplining people.</p> <p>17 There's a further point that we wanted to emphasise 18 which is that both the former Information Commissioner, 19 Mr Thomas, and the present one, Mr Graham, confirmed at 20 your seminar on 12 October last year, and again in their 21 evidence, that they didn't perceive any problem of the 22 press purchasing illegally obtained information had 23 persisted after 2006. So the problem those gentlemen 24 both identified and the earlier one brought out in the 25 report they saw as historical.</p> <p style="text-align: center;">Page 76</p>

19 (Pages 73 to 76)

<p>1 In those circumstances, we suggest that disciplinary 2 action, either in 2006 or in 2011, wasn't actually 3 realistic against individual journalists and exploring 4 the issue of why it did or didn't happen won't assist 5 your Inquiry at all.</p> <p>6 As far as the second question is concerned -- 7 namely, the retention and possible current processing of 8 the data -- the first point is similar to the one I have 9 been putting forward, namely that in 2006 we couldn't do 10 anything because we didn't know what the data was. By 11 2011, the data is very old. It's got to be at least 12 nine years old. It would be a huge effort, 13 a disproportionate effort, to try and identify what in 14 most cases is this low grade personal information, 15 ex-directory numbers, see if they're on the systems 16 separately from their presence on the systems through 17 other avenues, and again, we question how much you'll be 18 assisted by exploring that issue, certainly now that 19 we're well downstream from Module 1.</p> <p>20 There's a final point I wanted to make, which is 21 a harder edged point. You have a lot on your plate in 22 this Inquiry, as you say from time to time, and 23 I certainly recognise it myself. There are other 24 officials under the Data Protection Act who have the 25 duty of seeing whether our current processing is lawful,</p> <p style="text-align: center;">Page 77</p>	<p>1 concluded that there was insufficient evidence to charge 2 any of them. Mr Gilmour explained in his oral evidence 3 that that was because they couldn't establish guilty 4 knowledge on the part of any one of the journalists.</p> <p>5 You'll recall from exhibit RJT49 to Mr Thomas' first 6 witness statement that when Mr Whittamore and two others 7 appeared in front of Judge Samuels at Blackfriars Crown 8 Court, the judge made it clear that there was no halfway 9 house in the matter and the presumption of innocence 10 applied in relation to each of the journalists in 11 respect of whom a decision had been taken that there was 12 insufficient evidence to charge them.</p> <p>13 Secondly -- I can take this quickly too; it's a 14 point made by Mr White -- such alleged misbehaviour as 15 had taken place prior to 2006 appears to have ceased in 16 the view of not merely the current Information 17 Commissioner but also his predecessor, Mr Thomas, and 18 indeed you'll recall that in your ruling at the end of 19 last year on access to the evidence submitted by 20 Alexander Owens, you said at paragraph 3 that there was 21 no basis for suggesting that the conduct that had given 22 rise to Operation Motorman had been repeated, and 23 doubtless you derived that from two passages in 24 Mr Thomas' first witness statement at paragraphs 44 and 25 46, where he said that what he was getting from his team</p> <p style="text-align: center;">Page 79</p>
<p>1 fair, appropriate. Any individual who is concerned can 2 make a complaint under the Data Processing Act. The 3 High Court as jurisdiction to rule. The ICO has 4 jurisdiction to rule. Fortunately, you may think, you 5 don't.</p> <p>6 If our current processing, such as it is, is lawful 7 under the Data Processing Act, the press can't be 8 criticised for any retention and continuing processing 9 and I'd respectfully invite you to put aside this 10 invitation to add yet more to your workload, largely 11 because it won't take you anywhere but also for the 12 reasons I've given.</p> <p>13 LORD JUSTICE LEVESON: Yes, I understand. Thank you very 14 much. Right.</p> <p>15 MR BROWNE: In cricket I'd be called the nightwatchman.</p> <p>16 LORD JUSTICE LEVESON: I would never describe you in that 17 way, Mr Browne. Other ways, yes, but not that way.</p> <p>18 MR BROWNE: The first point I want to make -- and I have 19 five -- is the issue, as Mr White says, is now 20 historical. The search warrant which seized the 21 Whittamore documents was executed as long ago as 8 March 22 2003. Subsequently, as we heard from Mr Gilmour, the 23 seven journalists are interviewed under caution. None 24 of them were ever arrested. Within a matter of, weeks 25 on 6 March 2004, the Crown Prosecution Service had</p> <p style="text-align: center;">Page 78</p>	<p>1 was that press misconduct of the type that had led to 2 the two ICO reports in the second half of 2006 had 3 largely ceased thereafter and that the allegations that 4 had surfaced since July 2011 appeared to predate 2006. 5 Mr Thomas confirmed all of that when cross-examine by 6 Mr Caplan, Day 14, page 117.</p> <p>7 More recently -- and we can hand up a copy of this 8 if it is necessary -- Mr Graham, the current Information 9 Commissioner, told the Commons Justice Committee 10 in September last year that so far as the ICO's office 11 was concerned, the activities of the press recently have 12 not particularly come to their attention and the concern 13 that he had about Section 55 was really not very much to 14 do with the press as opposed to those in the financial 15 services sector.</p> <p>16 Thirdly, when the Inquiry comes to consider culture 17 practices and ethics of the press in relation to my 18 client, a relevant consideration will no doubt be that 19 the editors of the Daily and Sunday Mirror accepted in 20 cross-examination by Mr Barr that given the sheer volume 21 of requests, it would be surprising if every request to 22 Mr Whittamore by their journalists was covered by 23 a public interest defence. That, we say, is really as 24 far as you need to go, and when the question arose on 25 day 37 during the evidence of Mr Dacre of much the same</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 question, you indicated that what interested you and the</p> <p>2 Inquiry was whether it was accepted that there was</p> <p>3 a possibility that some the inquiries could not be</p> <p>4 justified. If I can just quote a sentence from what you</p> <p>5 said. At page 56 of Day 37 in the afternoon, you said</p> <p>6 this:</p> <p>7 "I'm not concerned to ask how many or who because</p> <p>8 that's a detail which, for the purposes of my Inquiry,</p> <p>9 I don't believe I need to go into."</p> <p>10 You said something very similar in response to</p> <p>11 Mr Sherborne on Wednesday afternoon at page 76 when you</p> <p>12 said that the purpose of the Inquiry cannot be to answer</p> <p>13 all the factual issues and you said this:</p> <p>14 "It would be quite impossible to look at ten years</p> <p>15 of journalistic endeavour across a wide range of titles</p> <p>16 and do balanced and fair justice to individual</p> <p>17 incidents."</p> <p>18 Fourth point --</p> <p>19 LORD JUSTICE LEVESON: Sometimes I say things which appeal</p> <p>20 to me even now.</p> <p>21 MR BROWNE: That comes as much comfort.</p> <p>22 LORD JUSTICE LEVESON: I'm not so sure, Mr Brown.</p> <p>23 MR BROWNE: I think (inaudible) is the adjective that comes</p> <p>24 into my mind.</p> <p>25 Fourthly, the requests which Mr Sherborne made,</p> <p style="text-align: center;">Page 81</p>	<p>1 of the fact that the names had been obtained by reason</p> <p>2 of the exercise of the search warrant in March 2004, the</p> <p>3 journalists had not been prosecuted, let alone convicted</p> <p>4 and they'd had no chance to defend themselves.</p> <p>5 The other point in relation to delay is this. Back</p> <p>6 on 13 March 2012 at the beginning of Day 49 in the</p> <p>7 morning, you, sir, made a ruling declining to make</p> <p>8 public the submissions received in private on 2 December</p> <p>9 last year in relation to Mr Owens' evidence and you</p> <p>10 added to that, as one sees between pages 2 and 3 of Day</p> <p>11 49 in the morning, that if Mr Sherborne wished to argue</p> <p>12 that it was appropriate that the Inquiry should publish</p> <p>13 the documents seized in Operation Motorman in 2003, you</p> <p>14 would set aside time formally and in public to consider</p> <p>15 the issue, but in the same ruling, having emphasised yet</p> <p>16 again that the Inquiry was not concerned with individual</p> <p>17 conduct, you said it would be unfair to name the</p> <p>18 reporters identified in the Whittamore records seized</p> <p>19 during Operation Motorman.</p> <p>20 Finally on this issue, the sheer volume of</p> <p>21 information would make answering these enquiries</p> <p>22 impossibly burdensome at any time, let alone so late in</p> <p>23 the day. There are, on any footing, a large number of</p> <p>24 transactions, a large number of journalists who would</p> <p>25 have to be investigated, and there is no easy way into</p> <p style="text-align: center;">Page 83</p>
<p>1 which are effectively to reopen and extend the ambit of</p> <p>2 Module 1, come far, far too late in the day. I had to</p> <p>3 ask somebody to tell me but I had to be reminded that</p> <p>4 hearings in Module 1 ended as long ago as Thursday,</p> <p>5 9 February, and I wish Mr Sherborne was here so I didn't</p> <p>6 have to say this behind his back, but it really is</p> <p>7 disingenuous to suggest, as he did when he opened this</p> <p>8 application, that it was made in the light of</p> <p>9 DCI Gilmour's evidence. The detective chief inspector</p> <p>10 had said nothing in his oral evidence or in his witness</p> <p>11 statement to suggest, for example, that offending</p> <p>12 journalists had been promoted to senior positions, a</p> <p>13 point that Mr Sherborne wishes to pursue in the first</p> <p>14 set of questions.</p> <p>15 LORD JUSTICE LEVESON: You haven't said it behind his back.</p> <p>16 He'll read it.</p> <p>17 MR BROWNE: Good. He may even be watching me live.</p> <p>18 Indeed, just reverting to DCI Gilmour, he was at</p> <p>19 pains not to mention the names of the journalists</p> <p>20 questioned, in accordance not only with your</p> <p>21 self-denying ordinance but also the stance adopted by</p> <p>22 Mr Thomas and the ICO. You'll recall that Mr Thomas, in</p> <p>23 his second witness statement, said that the ICO had</p> <p>24 always regarded the names as personal data and he</p> <p>25 emphasised the sensitive nature of that data by reason</p> <p style="text-align: center;">Page 82</p>	<p>1 that process because there's no database as such of the</p> <p>2 information from the Whittamore documents.</p> <p>3 My fifth and final point, turning to the detail of</p> <p>4 the questions as applicable to Trinity Mirror --</p> <p>5 LORD JUSTICE LEVESON: I've got up to six points, Mr Browne,</p> <p>6 but never mind. Yes.</p> <p>7 I found I couldn't count yesterday, I counted the</p> <p>8 wrong number of families, as somebody was quick to</p> <p>9 correct me. Yes?</p> <p>10 MR BROWNE: First of all, the group in questions one, we</p> <p>11 already know the answers to the majority of those</p> <p>12 questions. They were covered in the evidence of the</p> <p>13 editors and of Sly Bailey, our chief executive, on</p> <p>14 16 January. No one at the Mirror was fired, no one was</p> <p>15 disciplined, and just to summarise very shortly, what</p> <p>16 Mrs Bailey said was that in 2006, following the</p> <p>17 publication of the ICO report "What price privacy?",</p> <p>18 Trinity Mirror had adopted what she described as</p> <p>19 a forward-looking approach, not declaring an amnesty and</p> <p>20 making very, very, very clear, she said, what was</p> <p>21 acceptable and what was completely and absolutely</p> <p>22 unacceptable. If, back then in January, there had been</p> <p>23 relevant additional questions to ask, they should have</p> <p>24 been submitted then.</p> <p>25 In relation to the last of the four subsidiary</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 questions in question one, namely are the journalists 2 still working for the newspaper and even being 3 appropriated to senior positions, the Inquiry's 4 consistent approach, rightly in our submission, has been 5 not to identify individual journalists.</p> <p>6 In relation to question 2, the procedure of this 7 Inquiry is, we submit, not a Trojan horse to fish for 8 disclosure which cannot be obtained by other means. 9 I think that's a terrible mixed metaphor, but I hope my 10 meaning is clear. You will doubtless be aware that the 11 ICO has established, I believe since the commencement of 12 this Inquiry, a fast-track service whereby individuals 13 can find out, by means of a subject access request under 14 the DPA, if the Whittamore notebooks contain any 15 information about them. That is route that is open, and 16 there was certainly nothing in Mr Gilmour's evidence to 17 suggest that information was still being retained, let 18 alone used, nine years after it had been seized. 19 Indeed, very much the contrary, in the light of what 20 Mr Thomas and Mr Graham have said.</p> <p>21 My final, final point is this. Following the 22 hearing on 2 December last year, the data sticks with 23 the Whittamore information on them were released to the 24 core participants, including Mr Sherborne and his 25 client. They were released precisely so that, having</p> <p style="text-align: center;">Page 85</p>	
<p>1 analysed them, they could make submissions on the 2 contents. It appears that that is an option that they 3 have declined to take. They have chosen not to do so, 4 and now, very, very late in the day, nearly six months 5 later, they adopt this procedure, which will involve 6 going back over Module 1 and involve a massive exercise 7 both for the participants, if they are ordered to 8 undertake it, but also for the Inquiry subsequently to 9 analyse it. In my submission, it is a simply hopeless 10 application.</p> <p>11 LORD JUSTICE LEVESON: Thank you.</p> <p>12 MR CAPLAN: I adopt all of that. I don't know whether I can 13 usefully add anything, but I think it's all been said, 14 if I may say so.</p> <p>15 LORD JUSTICE LEVESON: Thank you very much. I'll let 16 Mr Sherborne read it all and at some stage when we next 17 have a break and I feel we need to do some more work, 18 he'll get the chance to respond.</p> <p>19 Anybody else want to say anything else on this 20 topic?</p> <p>21 Thank you very much. 10 o'clock on Monday morning. 22 (4.22 pm)</p> <p>23 (The hearing adjourned until 10 o'clock 24 on Monday, 14 May 2012)</p> <p>25</p> <p style="text-align: center;">Page 86</p>	

22 (Pages 85 to 86)



<p><b>A</b></p> <p>abducted 54:7 ability 66:7 68:4 68:4,5 able 10:20 11:2 14:3 25:17 absolutely 14:6 26:1 29:6 31:19 32:11 35:1,11 39:23 41:24 42:3,18 58:1 69:12 84:21 abstract 75:19 accept 10:16 11:11 13:14 24:3 36:22 65:5 69:7 acceptable 84:21 accepted 37:5 80:19 81:2 Accepting 14:5 access 8:9 32:3 79:19 85:13 accompany 26:21 account 50:6 51:15 accountability 50:3 accurate 33:7,8 accusation 37:10 accused 33:5 acquisition 29:5 act 57:15 58:13 77:24 78:2,7 action 72:18 76:13 77:2 actions 56:19 activities 80:11 actual 75:13 add 21:20 70:4 78:10 86:13 added 36:16 83:10 additional 84:23 address 61:24 addresses 74:16 adjective 81:23 adjourned 86:23 admitting 26:5 adopt 86:5,12 adopted 82:21 84:18 adopting 3:22 advance 72:4 adverse 2:6,9 advice 51:4 advise 17:3 20:13 advised 42:10 advisor 11:6 advocate 59:4 affairs 7:23 9:1 51:10 affidavit 31:21</p>	<p>31:22 32:6 afraid 1:10 afternoon 72:2 81:5,11 age 74:20 agency 16:7 ago 10:2 19:7 71:7 73:6 78:21 82:4 agree 4:14 11:23 12:12,13 14:4 41:6,7 49:8 50:8 54:18 55:16 56:15,25 57:1,11,23 61:17 agreed 16:18 50:21 56:14 64:24 agreeing 14:14 agreement 39:21 Ah 1:15 alchemy 60:13 Alexander 79:20 allegation 30:12 34:21 43:18 allegations 31:20 60:16,17 80:3 alleged 79:14 alleges 23:8 alliance 4:15 6:20 12:7 13:23 16:4,6 16:11 67:16 68:3 allowed 1:8 46:5 46:7 47:12 49:17 54:10 altogether 18:22 ambit 82:1 America 54:12 amnesty 84:19 amount 12:6 analyse 86:9 analysed 86:1 Anderson 8:21 8:23 9:2 Andy 58:24 and/or 21:14 anecdote 1:13,14 annual 26:25 answer 21:10 24:11 32:5 36:14 40:12 72:13 81:12 answering 32:25 83:21 answers 84:11 anti 68:20 anti-bSkyB 67:12 68:3 anti-Sky 3:25 4:15 5:17 6:20 12:7 13:23 16:4,6,10 67:15</p>	<p>anybody 8:16 47:24 57:5 58:2 70:9 71:7 71:18 86:19 anyway 44:3 73:25 apologies 59:14 apology 61:3 apparent 49:6 75:17 Apparently 32:6 appeal 45:2 81:19 appearance 35:19 58:13 appeared 79:7 80:4 appears 24:21 79:15 86:2 applicable 84:4 application 70:18 72:1,4 72:11,24 82:8 86:10 applied 79:10 appreciate 70:12 70:21 appreciated 58:6 approach 84:19 85:4 approached 1:12 appropriate 13:16,20 28:13 29:14,20 62:3 78:1 83:12 appropriated 85:3 approval 75:11 arena 41:2 argue 83:11 argued 1:7 52:14 argument 14:5 54:17 arguments 6:24 7:5 52:24 argument's 13:14 arose 4:9 80:24 arrested 78:24 arrived 1:11 article 22:13 30:10,20,22,24 31:1,17 32:2 34:20 35:18 Asia 9:2 aside 78:9 83:14 asked 18:14 20:12 37:15 39:4,13 40:18 40:20 64:19 69:1 74:6,9 asking 33:1 49:16 63:9 69:8 asks 76:2 aspect 32:18</p>	<p>58:8 59:18 aspects 53:15 59:8 61:20 assess 39:7 assessing 50:19 51:11 assessment 50:24 assist 14:3 17:1 18:6 21:13 39:10,12,14 77:4 Assistant 24:22 assisted 77:18 association 42:4 42:4 assumed 15:11 28:4 assumption 34:2 35:10,25 assumptions 35:22 astounding 69:17 attack 35:13 attacks 36:2 attend 16:15 attendance 25:3 attended 25:20 26:20 43:8 attention 7:19 71:18 80:12 au 52:20 August 3:4 44:22 autumn 20:3 29:4 available 8:16 avenues 77:17 Awards 25:2,21 25:25 26:10 27:3 28:6 29:24 aware 7:7,9,10 7:14 15:15 27:25 28:6 38:2 46:19 75:3 85:10</p>	<p><b>B</b></p> <p>Baby 44:15,22 45:18 46:1,1,8 47:13,25 48:2 48:14 back 3:14 5:7 13:1 21:6,10 24:17 25:14 32:10 33:20 40:17 42:10 49:2 52:17 53:23 54:12 73:9 82:6,15 83:5 84:22 86:6 backbench 2:12 backing 68:23 bad 6:21 33:12</p>	<p>baffled 12:22,24 14:13,20 15:1 bafflement 10:19 14:18 Bailey 84:13,16 balance 29:11 balanced 81:16 Balls 44:24 45:8 45:12 46:18,21 46:23 47:4,15 47:17,21 48:4 48:5,16 49:5,8 49:10,14,16 banished 56:21 bargain 66:10 Barr 80:20 based 19:7 59:24 basically 47:24 basis 27:10,13,13 42:14 56:8 79:21 BBC 3:4 34:7 35:24 67:18 beginning 13:24 18:7 35:4 68:20 83:6 behalf 70:20 behaviour 43:5,5 belief 19:7 believe 2:16 12:17 17:15,21 30:11 33:22 63:18 68:15 81:9 85:11 believed 36:15 bend 49:8 benefit 57:12 best 7:6 24:23 35:13 55:9 better 5:18 49:20 60:5 beyond 62:12 bid 3:21,25 4:7 4:15 5:17,19 5:23 6:8,15,18 6:20 7:2,8,14 7:22 9:4,15 12:4,7 13:23 14:9,17 15:6 15:16,19,25 16:3,4,6,10,17 17:8 67:12,12 67:15,19 68:3 big 51:14 65:9 biggest 59:12 61:2 birth 30:15 birthday 43:7 bit 19:22 36:21 62:11 67:14 69:11 70:1 71:10 bits 63:9 BlackBerry 18:8 Blackfriars 79:7 Blair 2:12,16</p>	<p>blame 23:2,12 24:7 bold 44:2 56:13 57:14,16 book 69:1 born 41:18 bottom 18:17 bought 63:5 bound 51:10,23 boy 39:25 boyfriend 46:8 Bravery 25:2,20 25:25 26:10 27:2 28:6 29:24 break 49:21,23 73:8 86:17 brief 12:20 briefing 9:7 briefly 71:24 Brighton 1:5 bring 53:25 British 56:15 67:18 broke 25:24 26:9 37:5 48:14 broken 37:2 52:11 Brooks 1:3 3:15 8:18 10:4 13:1 15:3 20:5 22:8 25:6 26:19 31:15 37:17,21 39:20 40:7 42:14 49:25 55:17 56:17 57:6,16 62:7 70:9 brought 11:16 11:20 13:3,7 13:13 14:5 17:5 53:22 54:14 76:24 Brown 2:17,19 30:6 33:5,13 35:18 36:3,16 40:11 41:8,8 41:16,18 42:13 42:19 43:3,24 81:22 Browne 78:15,17 78:18 81:21,23 82:17 84:5,10 Browns 34:5 38:6,13 39:19 39:21 40:5,17 41:14,20 42:2 42:10 44:11 Brown's 30:13 31:20 34:22 36:1 40:25 43:11 Bryant 1:6,12,15 1:20,22 2:15 BSkyB 3:14 4:3 5:19,23 6:8,15</p>	<p>7:14,22 12:4 15:6,16 18:14 67:12 bump 25:7 bundle 8:13 burdensome 83:22 Burnett 55:21 business 67:1 buy 4:3 16:9 60:15</p> <p><b>C</b></p> <p>cabinet 9:8 15:4 Cable 4:18 9:5 15:11 17:14 Cable's 15:7 17:22 call 6:22 16:5 46:16,23 47:8 48:19,21 called 2:13 46:15 46:16,19 68:20 78:15 calling 2:16 45:3 Cameron 4:23 4:25 5:1,11,13 5:22 6:1,2,8 17:4 campaign 44:15 48:1,17,24 49:14 52:23 53:16,19,21 54:20,24 55:10 55:16 56:16 57:14 58:2,9 58:10 68:19,24 campaigns 51:18 53:18 capitals 35:15 Caplan 80:6 86:12 career 62:22 careful 31:12 caring 42:23 carried 17:16 carry 15:11 case 13:15 17:14 21:23 30:5 39:16 47:10 48:20 60:17 cases 35:22 77:14 cash 25:13 66:17 caution 78:23 ceased 79:15 80:3 celebration 43:7 cent 16:8 56:14 central 54:24 55:10 centres 6:22 CEO 22:2 certain 18:9 28:14 73:25 75:19</p>
--	--	--	--	--	---	---	---

certainly 16:23 45:18 57:8 77:18,23 85:16 chain 15:15 challenged 74:1 chance 4:21 72:7 83:4 86:18 Chancellor 17:13 change 22:19 57:14 changed 64:17 changing 64:17 charge 9:14 46:9 79:1,12 charity 32:17,18 37:25 39:3,5,5 check 39:6 checked 54:12 chief 12:2 31:18 36:10 53:11 82:9 84:13 child 31:9 32:4 32:15 34:16 38:2,3 41:2 42:5 children 41:23 53:6 children's 44:18 child's 33:22 chimed 68:19 chosen 86:3 Chris 1:6 chronology 10:16 44:21 circulation 51:12 69:3 circumstances 52:4,6,8 54:8 77:1 claimed 37:2 claims 75:10 Clapham 1:16 clean 8:24 clear 5:25 6:2 12:12 18:22 29:2 31:20 48:15 55:4 57:25 79:8 84:20 85:10 clearly 2:19 40:6 64:25 client 80:18 85:25 clients 73:5 74:1 75:6 Clinton 54:13 close 38:6 45:20 64:20 closed 56:12 closing 72:20 coal 65:25 67:3 Coalition 15:4 code 19:19 64:16 collective 52:22 colliery 66:2,4,6	column 44:2 combination 50:13 combining 36:2 come 5:7 8:9 20:2 27:22 29:25,25 33:24 34:12 35:20 37:3,19 80:12 82:2 comes 67:3 80:16 81:21,23 comfort 81:21 coming 6:19 20:14 27:7 29:13 33:4 35:4 65:24 commas 5:10 commencement 85:11 commencing 45:9 47:3 comment 27:20 62:14 comments 17:22 commercial 4:17 61:8 67:2,7,11 67:19 commissioned 16:6 Commissioner 24:22 26:21 27:7,8 76:18 79:17 80:9 commissioners 29:18 committed 41:24 committee 19:23 20:2 24:9 80:9 common 1:16 4:1 56:2 Commons 80:9 communication 41:15 66:22 communications 9:3 community 54:6 54:11 69:19 company 23:11 30:25 company's 67:7 comparison 43:16 compedious 72:15 complain 62:21 63:10 complaining 60:23 complaint 78:2 complaints 59:12 61:2 62:21 completely 3:1 51:22 65:18 69:14 76:15	84:21 complexities 12:1,15 compromise 64:7 65:8 compromised 64:5 concentrated 63:2 concern 34:6,24 58:1 64:20 80:12 concerned 22:7 31:25 33:13 43:4 77:6 78:1 80:11 81:7 83:16 concerning 33:10 concerns 20:23 61:6 conclude 50:1 concluded 79:1 conclusion 36:20 68:2 condition 33:23 34:16,16 41:2 conduct 29:16 47:12 65:4 70:25 79:21 83:17 conducted 39:16 conference 1:5 3:6 50:17 conferences 28:22 confidence 38:20 39:8 confidential 75:22 confirmed 41:21 42:8,12 76:19 80:5 confronted 2:18 confused 4:6 consent 41:9 consequence 55:15 56:6,18 consider 40:5 62:18 80:16 83:14 considerate 42:23 consideration 80:18 considerations 67:11 consisted 75:6 consistent 65:15 85:4 Constable 53:11 constituents 52:12 constitutes 50:10 constructing 57:13	contact 8:4 27:12 29:17 30:1 63:18 64:4 contain 85:14 contained 73:19 contended 73:24 contents 45:16 49:17 86:2 context 23:6 24:12 29:19 35:17 continue 56:15 70:11 75:10 continued 27:3 43:6 68:24 69:4 continues 60:9 continuing 78:8 contrary 5:5 6:19 85:19 contribute 50:17 controversial 69:15 conversation 4:9 4:25 5:3,4,18 5:22 12:14,20 12:25 13:16,20 13:24 14:2,10 14:12 25:8,10 26:3 41:8 45:12,15 46:17 46:21 47:4 conversations 15:24 16:2 29:22 42:9 47:21 convey 52:19 convicted 44:23 54:6,9 58:11 69:18 83:3 convinced 65:15 65:18 copied 8:20 9:9 9:10,16,18 10:10 18:25 copy 80:7 core 71:15 72:13 85:24 Corp 4:4 5:23 9:2,3,14 15:17 16:16 17:9 21:18 corporate 9:3 correct 10:23 24:24,25 25:16 35:2 48:9 51:1 53:7 64:4 67:1 68:15 84:9 corrected 74:7 correction 37:7 correspondence 44:11 corrupted 19:14 corruption 19:13 cosiness 65:11 cosy 63:17	couch 24:2 Coulson 58:24 65:24 council 49:18 count 84:7 counted 84:7 country 6:22 30:2 61:15 67:17 coup 2:13 couple 1:3 8:11 8:12 course 3:3 8:5 15:3 16:11 19:18 27:24 30:24 44:17 47:14 52:9 56:1 59:18 61:25 65:14 Court 45:2 78:3 79:8 coverage 2:21 47:18 covered 2:8 38:24 48:14 80:22 84:12 covering 22:17 create 55:5 64:22 creation 6:22 credo 50:3 cricket 78:15 crime 26:23 27:14,15,15 44:23 45:16 criminal 54:18 crippling 30:17 criteria 58:14 critical 2:22 critically 35:21 criticised 78:8 criticism 53:10 59:9 60:23 cross-examina... 80:20 cross-examine 80:5 Crown 78:25 79:7 crude 57:19 culture 35:12 61:20 80:16 current 64:11,12 77:7,25 78:6 79:16 80:8 curry 2:13 cystic 30:6,15 31:10,11 32:16 32:18 38:2,3 39:4 41:24 42:4	dark 1:15 data 72:14,19 73:1 74:20 75:5,20 76:5 76:11 77:8,10 77:11,24 78:2 78:7 82:24,25 85:22 database 84:1 date 20:19 26:10 31:1 76:3 dated 10:9 dates 44:22 David 5:11 day 12:19 24:2 27:6 41:13 48:14,14 52:18 56:1,16 59:18 62:8 63:24 66:22 80:6,25 81:5 82:2 83:6 83:10,23 86:4 days 10:2 73:5 DCI 82:9,18 deal 66:16 70:9 dealing 65:19 dealings 21:14 29:20 dealt 17:20 debate 59:22 debrief 10:6 decades 61:14 December 5:20 9:5 10:9 17:22 24:23 44:25 47:2 73:19 74:21 83:8 85:22 decide 51:5 71:11 decided 71:9 decision 6:3,25 17:11,16 45:1 48:4,5,7 53:8 64:24 79:11 decisions 66:23 68:13 declaring 84:19 declined 86:3 declining 83:7 defence 35:13 75:17 80:23 defend 59:5 83:4 defended 4:7 defending 3:20 36:11 defensive 3:23 43:23 definitely 28:17 41:15 delay 83:5 deliver 48:2,22 71:13,14 delivering 2:20 demonstrate 38:8	demonstrated 36:14 61:13 Dems 9:7 deputy 28:4 derived 79:23 describe 34:24 38:16 78:16 described 22:13 84:18 designed 57:16 57:17 desire 71:20 detail 11:22 22:7 33:25 45:2 74:11 81:8 84:3 detailed 12:14 72:25 details 33:22 52:10 detective 82:9 developed 22:10 diagnosis 33:25 40:8,14 42:7 diary 25:5,15 Dick 27:17 died 46:4 difference 25:6 28:15 different 4:15 29:7 66:2 difficult 24:11 44:4 63:1,24 70:2 75:24 76:8,9 diffident 14:7 dinner 4:19 5:20 10:21 11:12,17 11:21 12:10,15 13:25 25:8 dinners 28:11 direct 8:4 48:8 direction 72:3,12 directly 15:19 19:2 21:24 28:2 34:4 38:13 director 44:17 73:3 disagree 57:21 disagreed 53:13 56:13 disagreeing 67:4 discharging 39:10 disciplinary 76:13 77:1 disciplined 72:17 76:1 84:15 disciplining 76:16 disclose 18:12 disclosed 17:24 75:13 disclosure 85:8 discover 55:21
--	--	---	---	---	---	---

discovered 16:8 30:14	dwell 33:11 dwelled 5:2	endeavour 81:15 ended 46:25 82:4	exercising 56:24 exhibit 75:22	59:20 61:15,16 66:19 78:1	70:5 fire 47:17	Fraser's 37:4
discretion 50:9 50:12 52:18	dynamics 22:18 22:19	endless 60:15	79:5	81:16	fired 84:14	fraught 22:10,12
discuss 11:20 26:22 34:17	<b>E</b>	enforcing 64:12	exhibited 75:9	fait 52:20	firing 46:25	Fred 7:7 8:8 9:1
47:8,10 51:19	ear 49:8	enquiries 83:21	exhibiting 75:19	false 30:13 34:22	first 15:14 17:8	12:19 16:23
62:1 63:3	earlier 10:1	enquiry 20:1	expansive 25:10	34:25 35:14	18:16,18 25:23	21:17,22
discussed 5:19	15:18 50:12	ensure 66:20	expect 71:1	37:7 73:15,16	33:20 34:5,20	Frederic 18:21
10:24 11:18	ear 49:8	ensuring 68:11	expected 3:19	falsity 43:17	35:19,19 42:21	free 59:5,6,8,9
25:17 26:4	early 4:19	entered 33:14	expenses 39:14	families 84:8	44:1,12 50:4	freedom 58:3
34:4 41:17	easy 83:25	entire 36:6	experience 28:23	family 22:18,19	59:10 60:22	freely 39:21
44:13 47:5,6,7	Ed 47:15,17,21	entirely 13:20	29:3,23 61:1	30:13 34:22	72:15,23 73:7	frequent 21:20
50:12 52:13	48:5,12 49:14	36:20 39:24	62:14 63:12	41:4 69:24	73:13,13 76:3	26:17
59:10 71:15	49:16	40:1	explain 34:13	famously 2:19	77:8 78:18	friend 41:16
discussing 11:8	edged 77:21	entitled 35:8	53:20 54:25	far 37:18 64:10	79:5,24 82:13	friendly 42:19,20
16:4 45:16	edition 26:15	entries 25:5	55:3 56:10	76:16 77:6	84:10	64:6
51:20,20	editor 3:4 26:23	73:25	explained 75:2	80:10,24 82:2	Firstly 73:9	friends 43:9
discussion 5:15	27:15 28:4	essence 16:3	75:15 79:2	82:2	fish 85:7	65:20,23
12:10 47:14	30:24 50:21,25	essentially 75:1	explains 31:22	fast-track 85:12	five 36:8 43:3	friendship 64:8
62:2	51:10,11,13	establish 79:3	74:19	father 22:9,11	49:21 72:24	65:11
discussions 5:10	56:24 62:15	established	explicitly 6:16	23:18 31:21	73:5 78:19	fringe 1:7
52:22	editorial 48:15	85:11	7:3	32:9,12 38:5,8	Fleet 60:21	front 40:2,9,15
disease 30:17	49:4 52:18	estate 55:20	exploring 77:3	39:1	focus 12:3 20:25	50:15 65:8
disingenuous	53:8 69:4 73:2	ethics 36:5 61:21	77:18	father's 32:1	focused 70:24	69:16,22 79:7
82:7	editors 50:8,11	80:17	expose 51:25	37:19,22 39:7	focusing 34:12	frustrated 49:6
disparaging 3:11	80:19 84:13	Europe 9:2	exposes 30:12	father/son 22:15	follow 58:25	frustration
disproportionate	editor's 51:8,13	evening 26:14	34:21	22:23	following 2:1	11:18
77:13	52:15	event 16:22	exposing 51:16	Faustian 66:9	58:5 84:16	full 25:5
distance 29:14	education 44:17	26:25	51:21	fear 17:17	85:21	function 25:7
distinction 4:4	effect 48:8	events 26:7,8	express 39:21	feature 8:11	footing 83:23	61:7
28:15	effective 53:21	41:18 57:7	expressed 4:10	featured 53:1	force 2:12,24	funny 59:22
distinctions	effectively 82:1	even-handed 6:7	52:25	February 82:5	forced 13:10,12	further 21:13,16
28:17	effort 77:12,13	everybody 15:4	expressly 74:9	Fedorcio 26:17	63:21	36:21 62:16,17
doctor 41:3	eight 45:25	43:15 51:4,5	extend 82:1	27:17	forceful 4:13	75:14 76:17
document 18:18	eight-year-old	66:21 70:14	17:1 39:11,12	Fedorcio's 29:3	5:21	future 19:24
documents 8:11	54:8	71:11 72:6	54:17 62:11,16	feed 49:2	forcefully 4:10	fuzzy 67:14
78:21 83:13	either 13:5 28:21	everyone's 64:4	70:24	feel 3:10 32:25	foreseeable	
84:2	29:21 61:23	evidence 7:18	extreme 69:7	51:9 60:18	55:15 56:6	<b>G</b>
doing 7:25 36:7	71:13 73:17	19:25 21:16	extremely 1:21	86:17	forewarning	gain 38:11,13,15
52:2 65:20	77:2	42:13 50:1	19:15	fell 18:12 62:24	72:9	galvanised 2:11
67:10 75:23	electorate 65:12	59:18,23 72:25	ex-directory	fellow 71:15	forgotten 8:24	gap 54:25
domain 33:14,23	65:16	75:7,22 76:21	75:6 77:15	felt 29:17 33:15	74:24	garbled 59:25
34:11 40:24	email 8:21 9:4,9	79:1,2,12,19	ex-PM's 30:14	34:9 36:7 37:9	form 34:1 35:13	gather 67:7
donation 39:2	12:11,13 14:8	80:25 82:9,10	eye 29:12 51:12	38:24 41:22	36:4 48:6	gender-based
door 23:25 71:10	14:15 15:14	83:9 84:12	eyes 4:13	43:10 49:18	formal 17:10	60:19
doubt 19:19	17:23 18:1,5	85:16	e-petition 45:3,6	53:15 55:9	formally 83:14	general 5:15
80:18	18:13,21 19:3	evidently 56:4		58:12 63:2	formed 27:9 34:2	28:8,9 35:1
doubtless 79:23	20:19 21:1,4	exact 31:1 57:7	<b>F</b>	fibrosis 30:6,15	former 37:2,10	49:25 57:9
85:10	emails 7:12,13	exactly 3:9 12:13	facie 75:18	31:10,11 32:16	76:18	59:14
Downing 28:22	7:15 8:11 9:24	14:11 63:21	fact 4:1 15:11	32:18 38:2,4	forms 62:10	generally 5:12
48:23	16:24 18:9,25	75:9	26:1 31:9	39:5 41:24	Fortunately 78:4	12:5 14:9
downstream	emblazoning	example 65:24	36:17 38:3	42:4	forward 5:17	16:17 22:2
77:19	40:15	67:20,21 68:3	43:18 48:13	fifth 84:3	20:4 77:9	66:15
DPA 85:14	emphasise 76:17	68:18 69:7,13	52:12 56:11	figures 50:6	forward-looking	generals 9:4
Dr 4:18 9:5	emphasised	76:4 82:11	65:5 69:3,15	51:12,15,17,22	84:19	generates 63:8
17:14,22	82:25 83:15	examples 40:19	73:9,18 83:1	52:1,7	found 10:1 17:24	gentlemen 76:23
drawn 7:19	employee 27:24	exchange 27:21	facts 37:12 43:20	file 8:17 9:19,23	69:17 84:7	George 5:11,18
drink 63:23	38:17	29:2	factual 81:13	20:24 62:10	four 42:6,6 74:7	11:20 12:18
drive 69:4	employees 76:13	Exechequer 17:13	failing 65:13	filed 72:25	74:22 84:25	52:14
driven 2:17	employment	executed 78:21	failings 46:10	final 61:17 77:20	fourth 3:18	getting 6:14
duties 39:9 65:12	76:11,15	executive 12:2	fair 6:12 8:8	84:3 85:21,21	81:18	15:25 67:18
65:16	enable 74:10	31:18 36:10	22:14,17,20	finally 61:11	Fourthly 81:25	79:25
duty 38:19 39:8	encompassed	64:9 84:13	23:6 24:2,5,8	83:20	four-year-old	Gilmour 78:22
77:25	12:10	exemplary 39:19	24:10 28:18	financial 80:14	30:14 39:25	79:2 82:18
DVD 2:20	encouraged 2:6	39:20	34:24 35:11	find 21:3 42:25	Fraser 30:15	Gilmour's 82:9
		exercise 75:23	36:20 40:5	63:12 85:13	36:1 40:11	85:16
		83:2 86:6		fine 14:20 24:3	41:18	girl 54:8

gist 9:4	66:3	67:17 69:17	idea 23:11	76:15	intending 59:7	11:23 12:1,11
give 13:25 27:19	Grove 55:20	78:22	ideas 50:18	indicate 38:5	intention 56:10	12:15 14:19,24
27:23 44:21	57:2	hearing 15:18	identical 54:8	47:15	interaction	23:24 25:18
49:20 59:8	grumble 72:11	42:23 85:22	identifiable	indicated 81:1	71:19	26:24 27:6
63:14 68:17	grumpy 60:21	86:23	73:17	indication 75:24	interactions	50:14 53:18
72:6	guarded 65:21	hearings 82:4	identified 73:17	individual 29:16	21:19	61:23 62:17
given 4:11 7:18	Guardian 25:23	height 60:24	73:24 76:24	52:10 64:4	interest 28:24	70:12 81:13
31:10 39:4,21	25:23 26:9,12	62:20	83:18	73:16 77:3	52:2 53:17	items 60:5
51:10 66:17	37:6,8 57:21	held 43:7 45:1	identify 37:23	78:1 81:16	66:3 75:17,21	
74:20 78:12	71:8	hell 42:20	72:19 77:13	83:16 85:5	80:23	
79:21 80:20	guess 13:9,10,12	help 63:7	85:5	individuals 65:4	interested 7:5	
giving 52:9	guide 20:14	helpful 19:15	identifying 31:12,24	85:12	18:4 81:1	
Gloucestershire	guilty 79:3	helping 40:10,16	31:25 32:23	industry 65:25	interesting 43:16	
53:11		helps 63:4	33:1 39:9	66:1	interests 67:2,7	
go 3:14 10:19	<b>H</b>	hesitant 31:23	illegality 75:4	infer 7:4	68:5,6	
11:5,6 18:16	hacked 30:12	hesitation 31:13	illegally 76:22	inflamm 57:17	internal 16:13	
21:6 28:19	34:21 37:12	he'll 82:16 86:18	illusion 48:16,18	inflammatory	International	
33:19 38:20	hacking 19:4,9	high 59:6 78:3	imaged 18:8	56:4	1:11 4:2 5:24	
52:22 80:24	22:4 25:18	highlight 30:18	imagine 25:21	influence 48:5	12:2 16:14,16	
81:9	33:5	55:9	36:22	63:8 66:24	20:22 21:18	
God 32:5	hacking/practi...	highlighted 42:3	importance 50:4	influencing 50:6	22:2 23:25	
goes 18:21 36:21	20:12	highlighting	important 16:16	informal 12:4	27:25 36:4	
52:17	half 59:25 80:2	54:24	33:9 37:1	63:18	68:5 70:21,25	
going 2:4 3:6	halfway 2:17	hindsight 57:12	52:21 61:12,18	information 8:1	72:25	
8:16 9:21	79:8	hired 16:7	61:24,25	27:9,21 30:16	interpretation	
11:19 12:7	hand 29:12 50:4	historical 76:25	importantly 46:5	31:6,8,10,11	12:24	
16:24 18:17	63:25 66:13	78:20	76:10	32:9,12,14,15	interview 34:7	
19:17 22:5	68:13,14 80:7	hold 13:1 33:16	impossible 75:16	32:16 33:2,13	35:25	
23:11 32:22	handed 20:24	38:8,20 65:18	81:14	35:4 37:19,22	interviewed	
33:11 37:20,23	handled 39:18	holding 50:5	impossibly 83:22	37:25 38:9,11	78:23	
42:15 51:6	43:5	51:15	improper 65:21	38:13,15,20,23	introducing 27:6	
55:23 56:3	Hang 9:20 14:21	home 5:20 53:25	68:1	39:17,18,25	intrude 17:18	
57:2,22 58:13	happen 12:20,21	honestly 65:17	improperly	41:11,11,19	intruded 62:12	
63:19 68:16	56:9 61:11	honours 25:13	66:16	49:16 54:2,11	intrusion 61:22	
71:6,14 86:6	77:4	hope 85:9	improve 57:17	63:22 67:8	inverted 5:10	
good 8:8,10 10:6	happened 12:17	hopeless 86:9	improved 64:1	69:16 72:19	investigate 74:10	
29:23 43:9	16:21 26:6	horse 28:25 29:5	inaccuracy	74:9 76:18,22	investigated	
50:7,10,19	31:14 33:15	60:14 85:7	59:15 61:3,7	77:14 79:16	83:25	
51:11,23 67:9	35:5 45:18	hospital 38:7	inaccurate 59:5	80:8 83:21	investigation	
68:18 82:17	69:24 72:16	hospitality 28:9	59:9	84:2 85:15,17	22:8	
Gordon 30:6,13	73:9,11,14	28:10	inaction 49:6	85:23	investment 6:19	
31:20 34:22	happening 23:3	hosted 25:1,1	inappropriate	initiated 12:25	invitation 78:10	
35:18	23:13	hours 18:19 21:6	14:1 29:21	14:3	invite 78:9	
gossip 60:23	happens 45:1	house 2:13 35:21	30:4	injuries 46:4	involve 86:5,6	
gossipy 60:5	73:7	35:23 79:9	inaudible 22:7	innocence 79:9	involved 3:20	

July 18:8 25:24 25:25 26:9,14 31:2 32:11 33:18 41:19 64:17 80:4 June 18:7,19 20:21,22 jurisdiction 78:3 78:4 justice 9:20,24 13:9,11 14:21 14:25 26:12 29:8,11 31:2 33:7,9,19 34:8 34:10,19 35:7 35:11 36:13,25 37:15 38:19 43:13 44:6,8 47:25 48:2 49:20 51:3 55:13 57:25 58:17 62:7 63:7 64:14,18 65:14 67:10,20 67:24 68:8,11 69:9 70:1,3,6,8 71:4,23 72:5 73:21,23 74:3 74:24 78:13,16 80:9 81:16,19 81:22 82:15 84:5 86:11,15 justified 81:4	66:24 67:8 68:15,22 69:20 69:23 71:5 72:5 77:10 84:11 86:12 knowing 39:8 75:15 knowledge 6:9 22:8 72:8 79:4 known 53:25 54:21 56:5 64:7 67:15 KRM18 8:12 10:2	29:8,11 31:2 33:7,9,19 34:8 34:10,19 35:7 35:11 36:13,25 37:15 38:19 43:13 44:6,8 49:20 51:3 55:13 57:25 58:17 62:7 63:7 64:14,18 65:14 67:10,20 67:24 68:8,11 69:9 70:1,3,6,8 71:4,23 72:5 73:21,23 74:3 74:24 78:13,16 81:19,22 82:15 84:5 86:11,15 Lewis 11:13 20:24 39:12 lexicon 51:15 Lib 9:7 life 61:14 62:13 65:1,7 72:10 light 23:15,16 63:11 82:8 85:19 limited 14:12 55:7,8 line 3:18,18 34:20 44:1 48:15 49:4 59:3 62:24 69:4 75:23 lines 3:6 75:20 linked 75:20 list 58:11 60:15 listen 22:21 listened 62:8 Literally 12:3 little 28:24 62:11 67:14 70:11 71:10,18 live 46:8 47:1 54:10 69:19 82:17 lives 40:20 living 54:6 55:22 lobbied 6:5 lobby 16:17 65:24 66:1 68:4 lobbying 6:14 12:6 16:24 48:6 lobbyists 7:23 8:1 logically 73:8 long 5:3 14:11 70:15 78:21 82:4 longer 30:24 32:7 look 18:4,16 20:11 34:19 42:14 51:4	62:18 76:9 81:14 looked 55:6 looking 12:18,21 47:2 61:21 looks 43:14 51:5 loopholes 56:12 LORD 9:20,24 13:9,11 14:21 14:25 26:12 29:8,11 31:2 33:7,9,19 34:8 34:10,19 35:7 35:11 36:13,25 37:15 38:19 43:13 44:6,8 49:20 51:3 55:13 57:25 58:17 62:7 63:7 64:14,18 65:14 67:10,20 67:24 68:8,11 69:9 70:1,3,6,8 71:4,23 72:5 73:21,23 74:3 74:24 78:13,16 81:19,22 82:15 84:5 86:11,15 lose 59:6 lot 16:24 20:23 22:17 27:2 28:20 42:21 51:19 60:16,19 60:22 63:1 77:21 lots 2:22 3:24 4:16 6:5 low 77:14 lowest 67:8 lunch 25:12 64:18 lunches 28:11	56:2 64:20 67:13 70:19 78:24 79:9 matters 29:17 33:3 51:12 Matthew 9:2 mean 10:15 11:24 12:19 17:8 21:17 22:12 25:1 31:17 48:25 52:15 60:25 61:25 65:9 69:12 71:6 meaning 85:10 means 3:11 32:13 38:24 50:5 56:21 58:3 85:8,13 meant 62:2 mechanic 53:19 54:15 58:15 69:13 media 4:16 19:9 65:12 66:22 67:17 medical 30:13 32:3 33:6,24 33:25 34:22 36:1 37:4,12 41:1 meet 24:22 25:1 63:18 meeting 1:7 9:15 25:11,19 67:21 67:24 meetings 9:13 16:13 24:13,18 26:17,18 27:23 28:20 Megan 54:13 Megan's 54:14 55:7 megaphone 64:23 68:12 member 13:22 57:3 members 3:24 4:16 memories 42:1 memory 11:12 21:13 26:7 mention 82:19 mentioned 5:1 5:20 26:2 36:5 70:20 mentioning 36:23 merely 2:4 57:13 60:18 68:3 79:16 merits 15:16 messages 18:9 met 4:20 metaphor 85:9 Metropolitan	24:19 27:18 30:2 Michael 47:22 Michel 7:7,24 8:21 9:1 10:9 10:18 12:19 18:21 20:13 21:17 Michel's 16:23 21:14,22 microcosm 61:12 militate 52:8 million 21:1 48:25 mind 56:21 57:19 70:16 71:12 74:4 81:24 84:6 minister 15:12 17:13 35:20 37:2,10 41:22 47:22 65:10,10 Ministerial 64:16 ministers 8:4,5 9:8 ministries 28:22 minor 72:11 minutes 10:17 12:16 49:21 Mirror 68:18,24 68:25 69:3 80:19 84:4,14 84:18 misbehaviour 79:14 misconception 4:2 37:3 misconduct 80:1 missing 54:3 mistake 36:19 57:4 mistakes 58:12 misunderstand 66:9 mixed 85:9 Mm 8:22 Mm-hm 21:12 MOD 74:12 module 59:11 62:2 70:23,24 77:19 82:2,4 86:6 modules 63:13 MOD10049133 74:12 Monday 70:23 86:21,24 monopoly 1:8 months 27:3,4 30:15 42:6 45:25 72:24 73:5 86:4 moral 59:6 Morgan's 69:1	morning 70:23 83:7,11 86:21 motive 56:17 Motorman 72:14 73:1 75:5 79:22 83:13,19 move 1:3 16:4 29:7 44:15 moved 58:24 69:23 moving 29:8 46:12 48:23 59:1 MP 1:6 52:15 63:22 MPs 20:25 39:14 murder 52:25 54:13 Murdoch 1:8 7:18 8:24 10:10 15:25 16:2,3,5,13 21:17 22:9,18 23:23 24:1 36:5 60:13,15 60:20 63:5 67:24 Murdochs 17:1 Murdoch's 24:8 myth 58:25 59:25
K Kanka 54:13 keep 9:7 29:12 36:23 68:15 keeping 70:16 Kemp 1:23 kept 68:22 key 9:7 killed 44:22 kind 6:18 29:19 43:9 53:17 65:1 69:8 kindly 17:24 24:17 knew 3:1 4:17 15:3 17:2,18 33:19 35:7 37:22 56:8 69:25 know 1:13 8:2,5 8:18 9:13,16 11:19 14:8 15:7,12 17:20 18:5 20:16 21:22,23,25 24:10 27:14 31:5,14 33:20 36:16,23 38:4 42:25 46:6 52:20 60:19 62:25 63:4 64:15 65:23	L Labour 1:3,5 3:5 language 49:11 55:4 large 25:7 70:24 83:23,24 largely 78:10 80:3 late 41:20 82:2 83:22 86:4 latest 16:4 launch 45:3 launched 45:6 47:19 law 53:1 54:14 54:18 55:7 64:15 69:12 76:15 lawful 77:25 78:6 laws 64:11,12 lead 33:1 57:7 leadership 69:10 leave 70:10 led 80:1 left 30:25 left-hand 43:17 44:2 legal 18:11 73:3 legislation 53:22 legitimate 32:12 38:24 39:15 54:1,20 75:8 legitimately 41:3 length 11:21 14:2 26:4 letter 2:15 10:13 10:13,24 11:8 11:11,23 12:2 12:11,15 14:19 14:24 letters 43:8 let's 13:7 37:18 38:20 42:15 54:17 level 6:18 8:7,9 48:25 lever-arch 62:10 LEVESON 9:20 9:24 13:9,11 14:21,25 26:12	M machine 27:1 main 12:3,3 33:4 48:6 majority 75:5 84:11 maker 48:7 making 19:4 35:16,17 41:25 60:24 84:20 man 60:21 manufacturing 67:3 March 78:21,25 83:2,6 marched 71:12 mass 49:7 66:22 massive 86:6 match 74:18 matches 61:3 material 2:7 62:9 matter 4:9 46:12 46:17 52:17	N naive 17:15,19 name 19:19 68:21 83:17 named 76:11 names 53:4,24 54:20 56:5 73:20 82:19,24 83:1 narrative 19:6 30:10 natural 55:15 56:18 67:16 naturally 17:17 52:24 61:5 nature 28:1,8,10 34:6 39:9 54:10 63:7 65:3,16 82:25 near 43:15 nearly 86:4 necessarily 3:25 17:16 51:24 58:14 59:13 66:10 necessary 9:7 54:19 71:9 73:15 80:8 need 20:2 29:12 44:1 53:24 54:18 65:6 71:5 74:13 80:24 81:9 86:17			

needed 4:13 56:12 needs 51:11 neutral 28:19 never 6:16,16 7:3 28:2 29:20 29:21 35:7 36:3,5 61:3 64:5,7 67:15 67:17 78:16 84:6 new 27:7 66:1 news 1:11 4:2,4 5:23,24 9:2,3 9:14 12:2 15:17 16:14,16 16:16 17:9 20:5,8,22 21:18,18 22:2 23:25 27:25 36:4 42:23 53:1,4 54:9 56:5 57:18 58:2 60:6 62:15 68:5 70:21,25 72:25 newspaper 19:25 33:4 37:11 48:13 50:20 59:11,13 68:17 72:12 85:2 newspapers 2:18 2:22 41:12,13 50:16 52:5 newsroom 35:5 52:21 60:10 NHS 38:17 46:2 Nick 3:3 night 2:14 10:22 10:25 14:12 nightwatchman 78:15 nine 76:7,14 77:12 85:18 normal 22:18 notebooks 85:14 notes 43:9 notice 18:10 November 30:23 34:3 40:2 42:5 42:11 44:12,23 45:9 47:3 number 20:14 21:14,25 39:18 53:2 83:23,24 84:8 numbers 75:7 77:15	obtain 27:9 obtainable 75:8 obtained 76:5,22 83:1 85:8 obvious 14:7,16 47:18 49:4,14 55:5 56:2,23 56:24 obviously 5:19 10:15 14:10 21:1,2 40:14 48:5 occasion 1:4 11:15 occasionally 9:15 16:14 occasions 4:7 13:1,23 16:12 44:14 occupied 22:3 61:14 occupying 7:7 October 8:20 41:20 42:12 76:20 Ofcom 10:13 11:23 12:1,16 offence 75:17,18 offend 55:23 offenders 53:5 53:25 54:21 56:6 57:14 58:13 offending 82:11 offered 29:3 offering 28:11 office 80:10 officer 26:21 officers 24:14,18 27:12 28:1,12 28:16,19 29:9 29:18,19 30:1 offices 23:25 officials 46:3 77:24 Oh 25:15 okay 8:11,14 9:6 17:23 25:15 28:8,24 45:8 50:1 57:24 62:6 old 42:6,6 60:21 74:22 76:7,14 77:11,12 older 76:8 once 36:5 68:23 71:10 ones 5:6 one-line 14:8 one-to-one 25:19 online 44:5,7 open 71:10 85:15 opened 82:7 opening 70:22,23 71:3,7,19 openly 66:23	openness 66:20 operate 75:10 Operation 72:14 73:1 75:5 79:22 83:13,19 opinion 57:20,22 opportunity 13:25 63:14 66:3,5 70:13 70:15,22 71:2 71:24 opposed 80:14 opposite 13:21 opposition 4:11 4:12 12:6 option 86:2 oral 79:2 82:10 order 2:12 18:11 18:17 53:5,25 57:14 ordered 86:7 ordinance 82:21 ordinary 68:16 organisation 27:2 originated 16:21 originates 2:23 Osborne 4:23 5:1,4,11,14,18 6:15,24 10:21 10:24 11:9,13 12:18,21 13:5 13:17 17:3 52:14 Osborne's 14:8 ought 56:23 outcome 55:24 57:8,8,10 overegged 7:24 overegging 8:2 oversimplify 75:24 overstated 21:23 overstating 60:17 overwhelming 42:1 owed 39:8 Owens 79:20 83:9 owners 66:4,6 owning 28:5 o'clock 86:21,23	19:3 21:7 22:6 24:21 40:2,9 40:15 50:3 59:16 66:14 80:6 81:5,11 pages 72:2 83:10 paid 39:1 pain 40:14 pains 82:19 paper 8:18 37:14 46:20 47:18 48:6 49:5,15 51:7 58:12 69:4 paragraph 3:17 4:8 5:8 14:22 20:10 22:1,6 23:20 44:2 50:1 58:21,22 59:16 60:25 61:22 74:13,20 79:20 paragraphs 3:14 58:18 79:24 parent 40:6 parents 54:11 Parliament 19:7 19:19 35:19 part 9:19 11:17 30:9 32:7 35:12 48:21 51:14,14 54:19 64:2 66:2 73:13 79:4 parti 51:10 participants 71:16 72:13 76:4 85:24 86:7 particular 17:12 35:3 36:8 38:7 50:24 52:23 61:6 75:15,20 particularly 3:12 4:11 5:3,21 6:6 6:10 9:16 15:7 15:19 20:23 21:21 23:12 29:18,24 45:24 58:10 61:24 64:8 65:22 74:13 80:12 parties 71:22 party 1:5 3:5 28:21 38:15,17 38:19 43:7 pass 24:6 passages 79:23 Passcoe-Watson 2:24 passing 8:1 23:2 23:12 passionate 59:4 patently 56:22 Paul's 55:20 57:2 Pause 70:10	Payne 52:25 54:3 69:24 PCC 20:3 50:9 50:25 people 3:19,24 4:20,23 6:5 9:14 16:8 18:4 19:1 25:7 35:14 40:20 41:14,23 42:10 44:22 45:3,25 56:13,14 61:2 62:22 65:19,22 66:12,18,24 69:13 76:16 people's 40:20 68:16 perceive 76:21 percentage 49:1 perfect 64:10 perils 72:9 period 18:7,13 41:10 54:23 permission 40:22 perpetrator 54:5 perplexed 12:18 12:22 14:18 persisted 76:23 person 48:2,3,8 personal 15:8,13 17:17 39:25 52:6 60:12,13 67:6 77:14 82:24 personalities 17:2,12 personally 11:6 perspective 67:5 persuaded 66:18 Peter 46:1,8 47:13 petition 47:19 48:21 49:7 petitions 48:22 phenomenon 61:13 phone 19:4,8 20:11 22:4 25:17 photographs 53:5,24 54:21 56:5 physical 56:7 Pia 73:2 74:11 picking 48:11 picture 25:5 piece 8:18 23:6,8 23:17 24:5,8 24:10 30:9 69:16 pieces 53:22 63:9 Piers 69:1 pikestaff 57:10 place 28:21 29:22 59:15	79:15 placed 40:1 plain 57:10 Plainly 12:21 plate 77:21 plays 33:10 please 3:15 23:9 34:20 50:2 plight 30:18 ploughing 10:1 plummets 69:3 plurality 19:9 pm 1:2 49:22,24 86:22 point 11:22 33:4 34:12,12 35:1 35:15,17 38:6 38:10 39:15 47:25 48:17,19 49:3,14 52:17 53:20 54:1,2 55:10 58:19 59:1 64:25 65:9 66:3,25 67:4 68:9 71:23 73:21 75:12 76:17 77:8,20,21 78:18 79:14 81:18 82:13 83:5 84:3 85:21 points 6:17 49:25 66:5 84:5 police 19:8 24:13 24:14,18,19 25:2,20,24 26:10 27:2,12 27:18 28:1,5 28:12,16,18,25 29:8,18,19,21 29:24 30:1,2 54:4 policies 50:6 policy 58:1 64:23 68:13 political 3:4 63:13 politician 64:6,7 66:13 67:6 politicians 1:4 3:11 4:1,18 28:13,16,21 50:5 62:4 63:16,19 64:15 64:21,23 65:6 71:19 poll 16:6,8 position 3:23 7:25 8:2 23:10 27:19 28:3 40:3 41:20 48:9 56:24 62:12 64:5,7 76:6 positioning	20:15 positions 82:12 85:3 positive 15:22 positives 42:3 possession 37:11 possibilities 13:5 possibility 26:5 81:3 possible 77:7 power 56:25 powerful 68:17 PR 16:7 practical 74:23 practice 61:20 practices 36:6 80:17 precisely 12:16 85:25 predate 80:4 predecessor 79:17 predict 55:24 57:1,3,6,8 predicted 55:19 57:5 predicting 55:8 prefer 61:23 preferences 17:12 prejudice 15:13 prejudices 17:18 premise 14:23 24:3 48:11 49:9 73:15,16 prepared 24:16 presence 77:16 present 6:13 76:19 presented 69:20 President 54:13 press 19:24 35:12 36:5 50:4 56:14 59:5,6,8,9,14 61:8,14,21 62:3,12,16 64:14,22 65:6 65:22 68:5,6 76:22 78:7 80:1,11,14,17 pressing 71:21 pressure 20:3 23:9 68:12 pressures 61:8 64:22 65:2,5 69:8 presumably 34:13 44:19 presumption 79:9 pretty 5:24 8:10 13:22 25:20 42:11 49:14 52:20 54:4 69:5
--	--	--	---	---	--	---

prevent 20:1 previous 18:25 21:7 28:7 price 73:10,18 84:17 prima 75:18 prime 8:5 17:13 35:20 37:2,10 41:22 65:10,10 principle 71:4 print 26:14 43:14 44:4 63:23 printing 19:11 prior 79:15 pris 51:10 prison 55:23 privacy 19:23 62:17 73:10,18 84:17 private 33:14,22 51:16,21,25 62:13 83:8 privately 20:13 probable 56:18 probably 7:6 8:15 9:22 11:16,25 16:3 16:10 20:9,25 21:11,16 26:6 37:6 41:14,16 56:16 76:8 problem 58:4 75:25 76:21,23 procedure 17:20 85:6 86:5 proceeds 14:22 73:14 process 27:3,16 66:2 84:1 processing 77:7 77:25 78:2,6,7 78:8 professional 29:14 65:7 prominence 59:14 promise 13:11 promoted 82:12 pronoun 20:13 PROP 8:17 proper 36:20 properly 15:13 17:17,21 proposition 56:1 PROPI000016... 9:19 prosecuted 83:3 Prosecution 78:25 protect 23:9 34:14 53:5 Protection 77:24 provide 27:13,13 66:7 provided 24:17	36:13 providing 75:9 pro-military 68:21 PS6 75:19 public 7:23 9:1 20:1 31:23 33:14,23 34:11 40:23 41:2,25 46:5 50:5,7,10 50:19 51:11,15 51:16,21,23 52:1,2,6 53:17 53:20 56:15 57:3 58:6 62:12 64:20 68:12 75:17,21 80:23 83:8,14 publication 34:5 52:9 84:17 publications 73:20 publish 39:22 53:24 54:20 56:4 83:12 published 2:15 31:2 34:4 37:8 41:13 42:2,5 44:12 51:7 52:10,14 53:4 56:8 62:9 73:10,19 publishing 41:11 purchasing 76:22 purely 43:22 purpose 18:10 26:18 47:8 81:12 purposely 31:16 purposes 62:1 81:8 pursue 82:13 pursuing 19:8 put 4:21 5:5,10 5:17 6:23 8:15 15:20,22 20:3 22:20 27:12,22 32:10 33:23 40:17,23 41:2 49:10 56:1 58:11 59:19 60:4,12 64:13 65:10 67:8 69:15 78:9 putting 31:19 43:22 50:14 69:22 77:9	34:19 37:15 39:13 40:12,13 46:13 49:9 58:4,5 64:15 66:19 68:11 72:15 73:7,13 73:17 76:3 77:6,17 80:24 81:1 85:1,6 questioned 69:13 82:20 questioning 48:12 55:25 questions 18:14 38:25 63:1 72:13 73:8 82:14 84:4,10 84:12,23 85:1 quick 84:8 quickly 10:20 11:3 79:13 quite 8:4 11:4 14:21 26:6 27:2 33:9 38:6 42:19 43:10 47:23 55:21 60:4 63:2,24 66:7 81:14 quote 81:4  R raise 3:19 70:19 raised 36:3 70:12 ran 24:10 42:11 68:18,24 range 81:15 raping 46:9 reach 36:19 reaching 68:2 react 58:6 reacted 69:5 reacting 50:13 reaction 49:1 50:15 67:16 reactions 69:24 read 7:15,16 15:14 21:2 49:5,15 60:6,9 62:9 69:2 73:3 82:16 86:16 readers 50:13,14 50:15 54:25 55:3 68:25 69:16,21 readership 36:24 49:1 68:19 69:5 reading 43:13 70:14 reads 60:6 realised 7:13 realistic 77:3 really 8:10 21:5 21:17 25:4 28:12 64:3 67:12 68:15	80:13,23 82:6 reason 10:20 14:7 17:21 36:8 49:8 53:14 60:3 69:18 82:25 83:1 reasons 72:6 78:12 reassure 32:10 rebellion 2:12 rebuttal 37:14 recall 1:4,9,12 74:21 79:5,18 82:22 receipt 39:16 received 83:8 receiving 41:10 reception 1:11 recognise 77:23 recognition 66:12 recollection 15:20 24:24 recollections 43:11 recommendati... 20:4 record 73:4 records 30:13 32:3 33:6,16 33:24 34:22 36:1 37:4,12 74:17 83:18 recurring 55:25 refer 5:12 58:19 reference 11:5 49:3 74:12 references 19:4 referred 31:6 61:4 referring 1:13 2:10 7:12 24:8 51:18 59:16 reflecting 13:21 refused 74:10 refusing 47:20 refute 31:19 60:16 regard 5:9 28:12 51:22 regarded 16:16 82:24 regarding 41:9 Regardless 16:21 regards 61:7 regime 20:1 regrets 58:10 regular 9:13 regularly 43:7 44:13 regulatory 19:25 reject 56:3 relate 61:4 relates 8:20	relation 5:16,16 6:13 7:8 15:5 16:17 17:3 39:25 44:23 47:14 61:6 64:14 72:14 73:1,25 75:6 79:10 80:17 83:5,9 84:25 85:6 relations 22:9 relationship 22:15,23 23:21 23:22 28:1 36:6 60:20 62:3 63:8 64:6 64:21 65:2,11 65:17 relationships 63:17 relatively 29:23 relaxed 39:24 40:4 released 54:7 85:23,25 relevant 5:13 10:3,3 18:14 38:8 48:3 76:5 80:18 84:23 reliably 59:19 reliance 61:9 rely 61:10 remainder 4:3 remember 1:18 1:19,20 2:10 3:8 5:18,21 11:17 12:14 13:3,13 14:2,6 14:11 15:18 16:5 22:4,5 25:11,19,23 26:3,9 31:18 35:24 37:6 41:1 43:2 44:18 45:7 46:23 47:23 49:10 58:19 74:24,25 remembered 14:10 remind 8:25 73:15 75:4 reminded 82:3 reminder 75:2 remit 6:4 19:24 reopen 82:1 repeated 79:22 repeating 19:6 reply 10:18,20 11:2 replying 70:14 report 20:3 73:10,18 76:25 84:17 reported 4:2 23:23 71:1	reporters 83:18 reports 80:2 reprisals 55:5,9 55:11 request 80:21 85:13 requests 80:21 81:25 residents 55:20 resides 50:20,21 50:25 resign 2:13 46:15 46:16 resignation 2:2 46:20 respect 33:3 65:18 79:11 respectfully 78:9 respects 59:17 respond 65:4 86:18 responded 21:2 responding 12:19 response 10:19 12:6 14:13,20 15:1 16:20 21:4,6 42:23 70:18 71:21 73:4 81:10 responsibilities 28:5 responsibility 15:12 50:16,18 50:20,25 51:2 51:3,8 responsive 69:25 responsiveness 69:10 rest 16:9 restaurant 11:14 25:9 28:14,20 restrictions 64:13 retained 72:20 85:17 retention 77:7 78:8 rethought 58:8 retired 28:25 return 66:8 reveal 30:16 31:12,24 32:23 revealed 46:7 revealing 38:22 reverting 82:18 review 45:17,17 46:6 47:12 49:17,19 50:9 50:24 64:11 rid 45:9,23 46:14 49:12 right 3:23 9:6 10:5,7 25:15 25:21,21 26:16 27:20 30:22	33:17 34:8,17 34:18 36:11,13 36:15 50:18,23 51:17 53:4 54:16 58:14,16 58:17 59:24 67:22 70:6,6,8 70:11,17 71:23 78:14 rightly 11:4 85:4 right-hand 43:19 ring 27:16 49:9 61:10 riot 57:2 rise 59:8 79:22 risk 29:15 30:4 53:16,18 55:5 rivals 4:17 RJT49 79:5 RMB1 24:16 RMB2 17:24 Robinson 3:3 role 7:7,14 17:10 51:13,14 56:24 room 61:17 route 85:15 Rubicon 19:5,17 21:3,8 rude 1:21 rule 26:1 78:3,4 ruling 79:18 83:7 83:15 run 40:18,20,22 42:15,16 52:6 58:3,9 Rupert 1:8 15:25 16:3,12 23:9 23:23 60:13 67:24  S sack 48:12 sacked 44:24 45:4 47:16 sacking 48:8 sad 42:24 Sadly 27:23 sake 13:14 14:5 sampled 7:17 Samuels 79:7 Sarah 41:16 42:19 43:9 52:25 54:3 Sarah's 53:1 69:12 Sarma 73:2 75:2 75:14 Sarma's 74:11 74:16 satisfactory 51:9 satisfied 32:11 38:23 40:1 66:21 saw 7:18 29:20 29:21 44:13 76:25
--	---	--	---	---	--	--



saying 1:18 3:8 6:20 12:17 19:17 22:4 23:18,22 24:6 26:6 33:17 35:2 37:25 38:1 43:21 49:13 50:23 61:1 63:14 64:10 65:5 66:9 68:25 75:1 says 12:13 21:24 32:6 70:14 78:19 Scan 10:17 scepticism 7:23 schedule 24:16 24:18 schedules 63:23 scotched 58:25 Scotland 2:17 screen 8:15 18:20 31:3 43:15,15 44:8 74:14 search 78:20 83:2 second 24:21 35:23 50:2 58:18 59:3 72:18 73:2 77:6 80:2 82:23 secondly 17:10 24:5 55:19 73:11 79:13 Secretary 19:16 19:18 44:25 section 18:10 75:18 80:13 sector 80:15 see 2:17 10:2 14:1 18:18 25:16 28:15 32:1 35:1,15 35:17 37:18 42:15 43:6 44:10 49:18 60:1 63:22 67:6 74:18 75:16 77:15 seeing 4:18 37:13 77:25 seek 59:5 seen 1:15 7:10,11 16:23 18:25 23:8 42:18 46:2 50:4 61:13 sees 83:10 seized 78:20 83:13,18 85:18 Select 24:9 self-denying 82:21	seminar 76:20 sends 18:21 senior 9:7 24:13 24:18 26:21,23 28:18 29:18 66:5 82:12 85:3 sensationalise 55:4 sensationalised 55:16 57:16 sense 56:2 71:12 sensitive 82:25 sensitivity 39:17 sent 10:9 sentence 45:19 81:4 separate 8:17 separately 77:16 September 1:6 28:25 80:17 sequence 26:7,8 41:18 57:7 serious 46:10 54:10 56:11,12 serves 26:7 service 24:19 75:9 78:25 85:12 services 44:18 46:1,2,7 47:11 72:17 76:1 80:15 set 17:8 50:2 73:20 74:11 82:14 83:14 seven 74:5,22 78:23 sex 53:5,25 54:21 56:5 57:14 58:13 shadow 47:22 Shandwick 16:7 shape 36:4 shared 6:1,6 shares 4:3 16:9 Sharon 44:17,24 45:10,22,24 46:10,14,25 47:4,9,15,17 48:13 shattered 30:16 31:5 sheer 80:20 83:20 sheet 9:25 Sherborne 70:12 72:3,21 81:11 81:25 82:5,13 83:11 85:24 86:16 Sherborne's 70:18 72:1 73:5 She'd 42:20 shocked 55:21	Shoemsmith 44:17 44:24 45:10,22 45:24 46:11,14 46:25 47:4,9 47:15,17 48:13 short 5:7 49:23 70:22 71:2 shorthand 49:21 shortly 70:14 84:15 side 4:21 16:25 43:17,19,22 63:3 sides 30:3 signatories 49:7 similar 39:13 45:6 77:8 81:10 simple 38:21 55:4 simply 43:20 73:19 74:22 75:6 86:9 sir 9:22 13:10 35:2,17 55:14 64:25 73:13 76:6 83:7 sitdown 26:3 situation 2:14 22:12 23:19 25:13 44:14 47:20 55:1,2 55:19 62:25 69:22 situations 40:19 six 11:14 84:5 86:4 Sky 4:17 16:9 slight 7:23 slightly 8:6,7 12:18,22 31:23 32:19 65:21 Sly 84:13 small 32:17,17 smear 30:14 34:23,25 35:15 36:7 43:18 snatched 25:8 social 11:15 12:14 44:16 46:1,2,7 47:11 society 32:19 58:3 sole 50:9,15,18 51:2 52:19 somebody 34:15 57:3 82:3 84:8 somewhat 71:21 son 22:9,11 23:19 29:4 30:14,17 34:15 39:22 son's 33:5 sorry 1:10 2:8 9:20 13:10 18:20 22:5	23:7 27:4 31:4 33:8 38:22 43:24 44:10 46:2 58:21 sort 27:20 31:13 57:10 59:22,22 60:6 61:13 65:9 68:22 sought 3:19 31:11 72:3 sounded 27:22 source 30:16 32:23 33:2,3 34:14,17 37:23 38:1,23 39:8,9 39:10,14,15 sourced 59:20 sources 27:18 59:24 61:9 75:8 speak 3:5 4:22 21:4 22:24 23:1 35:21 speaking 1:7 62:14 speaks 19:22 20:17 special 11:5 specifically 46:22 47:8 spend 22:17 spoke 41:13 42:13 47:21 69:9 spoken 41:14 47:24 stage 13:22 15:3 71:8 73:12 76:6,9 86:16 stale 76:16 stance 11:25 82:21 stand 37:9 59:24 61:9 standing 57:17 57:18 start 25:2 62:18 64:12 70:17 76:16 started 24:6 27:4 28:6 68:23 starting 20:11 starts 10:5 state 19:16,18 44:25 51:9 statement 1:14 3:15 5:8,13 11:16 14:22 18:15 19:5,17 19:19 21:3,8 21:22 22:1,6 40:25 41:3,4 42:19 43:19,20 44:9 50:2 51:19 58:18	61:18 62:5 70:22 71:3 73:2 74:12,16 74:19 79:6,24 82:11,23 statements 71:8 stature 28:14 steer 27:19 step 2:16 33:20 stepped 35:20 steps 72:18 sticks 85:22 stood 15:5 stop 72:22 store 22:20 stories 2:25 29:13 50:14 52:5,10 59:19 61:10 75:19 story 4:21 25:24 26:9,12 27:10 27:13,17,23 30:6 31:22 33:6,21 34:4,4 36:1,9,11,12 36:22 37:4,5 39:22 40:21 41:9 42:2,5,11 42:15 43:10,22 44:12,15 48:14 52:13 61:11 67:9 story's 61:18 strange 8:6,7 strategy 16:19 17:8 Street 28:22 48:23 60:21 strengthen 20:4 strengthened 54:19 strong 20:2 37:13 stronger 4:12 stuff 60:6 subedited 44:1 subject 46:12,17 50:8,24 63:15 70:4 85:13 submission 85:4 86:9 submissions 83:8 86:1 submit 85:7 submitted 79:19 84:24 subordinates 23:3,12 24:7 subsequent 2:21 35:5 subsequently 37:8 45:1 53:23 78:22 86:8 subsidiary 84:25 subterfuge 38:11	subtle 4:4 49:16 64:22 65:2 66:11 subtleties 69:8 suffered 41:23 sufferers 30:18 sufficient 66:20 suffusing 37:17 suggest 56:22 75:25 77:1 82:7,11 85:17 suggested 23:2 suggesting 3:22 57:9 68:1 79:21 suggestion 5:9 suit 60:15 63:5 summarise 84:15 summing 61:17 Sun 2:6,8,21,24 3:10 27:10 28:4 29:25 30:9,12 31:18 33:5,16 34:3 34:20,21 35:3 35:5,25 36:7 36:15,23,23,24 37:9,17 38:23 39:6 40:2,10 40:15 41:19 43:5,10 45:3 48:24 49:4 60:8,9 62:15 68:21 Sunday 45:6 74:4 80:19 Sun's 44:9 45:22 46:13 48:15 support 15:5 66:14,15 supporting 16:1 supportive 6:8 6:11,15 7:1,4 14:16 68:22 supports 19:23 suppose 7:22 8:3 38:16 64:2 66:4 76:3 sure 4:9 5:11 8:15 9:10 13:15 15:2 21:20 24:7 25:3,20 32:13 39:2,6 42:11 45:14 46:5 52:19 54:4 63:4 65:7 81:22 Surely 39:10 surfaced 80:4 surprise 7:20 20:18 surprised 18:24 48:25 54:3 72:23	surprising 20:7,9 80:21 survived 18:5 suspect 71:20 suspicions 15:9 sustained 46:3 swiftly 69:6 swim 60:14 swimming 63:6 system 64:10 69:18 systematic 60:18 61:4,7 systems 77:15,16
--	--	---	--	--	---	---

## T

tab 8:13,14 10:4  
17:24 18:1,2  
30:9 43:14  
table 17:5 73:19  
74:18  
tabloid 60:10  
take 20:4 28:14  
29:22 52:23  
67:20,21 76:4  
76:13 78:11  
79:13 86:3  
taken 23:10  
33:11 57:20  
59:15 72:19  
79:11,15  
takeover 67:25  
talk 23:24 66:1  
talked 67:11  
talking 22:1 24:1  
28:11 64:16  
talks 43:17 69:2  
Tank 2:20  
team 18:11 26:23  
29:25 50:16  
54:4 79:25  
Telecom 67:18  
telephone 45:8  
48:19,21 75:7  
television 47:1  
tell 2:19 3:3  
32:22 47:17  
48:12 82:3  
telling 11:10  
14:19,21 45:9  
tells 43:20  
ten 81:14  
tendency 61:10  
term 5:10 72:15  
terms 5:15 28:10  
50:19,23 56:14  
57:9 63:10  
67:1 72:17  
76:15  
terrible 37:10  
65:13 85:9  
territory 4:5  
16:11  
testimony 24:9,9  
35:22  
tests 41:21 42:12

text 18:9 19:3	thinking 14:9	83:24	61:5 62:7,23	volume 80:20	wedding 43:8	29:3 86:17
thank 8:19 37:15	third 3:18 38:15	Transcript 72:2	63:25 64:19,24	83:20	Wednesday	worked 21:17
67:25 70:3,5,6	38:17,19	transparency	64:25 68:9		21:11 72:2	28:2
70:7 71:25	Thirdly 80:16	64:1 66:21	69:14 71:23	W	81:11	workers 44:16
78:13 86:11,15	Thomas 2:20	transparent	72:12 74:3	walk 65:1	week 19:5 45:8	working 16:11
86:21	76:19 79:5,17	63:20,21	78:13	Wallis 27:24	47:3	54:14 70:15
Thatcher 67:25	79:24 80:5	transparently	understandably	28:3	weeks 19:7 20:14	85:2
theme 55:25	82:22,22 85:20	66:23	4:6	want 13:9 16:9	47:2 54:23	workings 52:20
they'd 16:7 83:4	thoroughly 19:8	traumatic 40:5	understanding	24:2 25:25	71:7 78:24	workload 78:10
thing 6:21,25	20:12	tried 24:6 56:10	18:23 50:13	28:19 32:23	well-oiled 27:1	World 53:1,4
35:23 42:21	thought 6:21	62:22,23	64:11	34:13 60:5	went 16:13 18:11	56:5 57:18
45:10 58:16	7:24 8:3,6,9	Trinity 84:4,18	understood 6:13	66:8 70:4,17	34:10 35:24	58:2 60:7
59:4,16 60:22	30:3 33:14	trivial 63:3	undertake 86:8	75:4 78:18	41:12 54:3	62:15
67:13	54:5,15 55:1	Trojan 85:7	unfair 3:11	86:19	63:5 75:14	wouldn't 11:2,24
things 2:9 19:8	58:15	troops 2:11	83:17	wanted 6:13	weren't 15:17	11:25 22:19
26:22 57:6	three 9:24 10:17	68:23	unfolding 23:24	30:18 34:14	17:15 43:12	38:7 40:18,21
60:13 72:8	12:16	troubled 71:10	unidentified	42:25 47:16	49:17 52:10	49:11 51:23
81:19	three-minute	true 2:2,7 14:6	75:2,14	48:22 52:19	We'll 5:7	55:16
think 1:13,24 2:9	13:24	22:16 30:19	unlawful 45:2	63:14,15 71:7	we're 25:14 29:1	write 2:6,25
2:11,20,23	throw 23:15	33:6 42:8	unreasonable	71:9 76:17	31:25 42:15	36:11,11 60:21
3:13 4:15,18	throwing 23:16	57:19 60:9	33:21 34:1	77:20	43:24 46:12	writer 49:21
4:20 5:4 6:5,12	thrown 72:8	61:10,11	untrue 3:1 23:17	wants 20:1 70:10	49:25 51:6	written 2:8
6:16,17 7:1,5	Thursday 82:4	trust 36:24 37:1	59:21	Wapping 25:12	60:10,11,12	30:21 35:18
7:21 9:9 10:13	time 1:5 2:13 5:5	37:1 52:11	update 16:10,12	28:21	70:15 77:19	55:12 62:9
10:21 13:16,18	5:7,19 7:9,21	5:7,19 7:9,21	27:7	war 68:20,23	we've 8:12 16:23	wrong 19:11
13:20,23 15:21	7:21 10:15	23:15,16 32:4	urge 64:2	warning 72:4	42:14 59:23	35:9,10,14,22
16:2,7,19,19	11:11,19 15:14	59:25,25 61:12	use 49:11 62:23	warrant 78:20	67:11	35:25 36:15,19
17:7,7,19 18:4	20:19,22 21:2	61:19	66:7 68:4,6	83:2	White 70:17,19	43:21,25 59:12
18:22 20:6,8,8	21:15 22:2,3	try 6:23 31:12	72:14	wasn't 1:21 5:2	71:5,17,25	60:17 68:25
20:17,19 21:3	22:14,17 25:13	47:11,24 53:20	useful 30:3	6:4,6,6 9:10	72:11 73:22	84:8
21:4 22:11	31:18 32:4,11	54:24 56:3	usefully 86:13	10:14 12:1	74:2,4 75:1	wrongdoing
23:19 24:17,25	34:5,9,18	74:17 77:13	usually 5:16	14:17 15:22	78:19 79:14	75:13
24:25 25:4,12	36:10 39:1	trying 4:3 6:18	25:25 26:20	23:5 26:13	whitewash 49:18	wrongly 73:24
25:23 26:12	41:10,20 42:1	63:12 67:5,7,9		27:15 31:25	Whittamore	wrote 31:17 36:9
27:14,16 28:18	42:12,20 43:11	turn 45:10 72:1	V	33:6,7,8 34:9	78:21 79:6	
29:14,16 30:20	45:13 46:3,6	turned 6:3	vague 31:15,16	38:18 45:24	80:22 83:18	Yates 24:22
30:22,25 31:7	47:23 53:13	turning 84:3	Vanity 22:14,17	46:10 47:10	84:2 85:14,23	25:12,16
31:13,16,22	56:3 57:13,21	two 13:5 28:17	22:20 23:6	48:4,7 55:8	Whittamore's	Yeah 10:8
32:7 33:1,2	64:17 70:11	36:2,16,16,17	24:2,5,7,10	56:19,21 58:14	72:16	year 1:10 25:2
35:19,24 36:2	71:11 77:22,22	44:22 47:2	59:20	60:23,24 63:9	wholly 17:17	28:7 63:1
36:8 37:3,5,8	83:14,22	54:23 55:12	variety 26:24	71:9 74:22	wide 81:15	64:17 67:22
37:13 38:22	Times 2:21 45:6	58:7 66:12	45:25	77:2	widely 71:1	76:20 79:19
39:2,4,12 40:4	59:20 68:1	72:13 73:5,8	various 28:22	watching 82:17	widening 19:24	80:10 83:9
40:4 41:10,19	73:3 74:4	76:11 79:6,23	63:13	Watson 1:25,25	wider 58:19 59:1	85:22
41:20 42:7,9	timetable 70:16	80:2	vast 75:5	1:25 2:3,9,9,15	wife 11:13,14	years 36:8 42:6
42:18,21 45:16	71:13	two-year-old	venue 28:20	2:18,22,25 3:7	41:22	43:3 53:2
45:25 46:15,19	titles 76:12 81:15	46:9	version 32:1	Watson's 2:1	wish 46:13 82:5	74:22 76:7,14
46:24,24 47:21	today 30:12	type 59:16 80:1	43:14 44:4,7,9	way 7:19,20 17:4	wished 83:11	77:12 81:14
47:22 48:11	34:21 60:4		59:25	26:11 27:22	wishes 58:2	85:18
49:3,20 50:11	61:13	U	Victor 55:21	28:12 33:15,16	82:13	yesterday 52:13
50:18,23 51:2	told 12:8 19:16	UK 1:9 4:5 6:19	view 6:13 13:21	34:3 39:16	witness 1:14 3:15	65:25 84:7
51:18 52:5,12	47:1 80:9	16:11 41:23	13:21,25 15:8	40:23 41:1,12	11:15 18:15	
53:19,21 54:22	Tom 3:7	ultimate 50:20	15:8,10,16	42:16 43:4	42:19 51:19	0
55:18,18,20,20	tone 37:13 49:11	51:3	34:1,2 45:22	48:3 53:20	62:4 73:2	02573 50:3
57:4,21 58:7	Tony 2:16	Ultimately 51:7	52:25 76:12	54:23 55:9	74:11,16,19	02576 22:6
59:10 60:3,19	top 44:16	unacceptable	79:16	58:7 59:22	79:6,24 82:10	02587 3:17
60:20 61:16,16	topic 86:20	84:22	viewed 7:22	63:12 69:21	82:23	02589 58:19
61:24,25 62:20	total 10:19	unchecked 54:10	views 4:10 5:5,23	75:1 78:17,17	wonder 62:13	02606 18:17
63:16,16,17	totally 12:22,24	55:22 69:19	5:23,24,24	83:25	wondering 62:11	02607 19:3
65:1,3,6 66:10	tough 43:11	uncomfortable	68:16	ways 52:24	word 40:4 60:5	
67:2 68:20,24	tragedy 40:14	32:25	vigilanteism	63:22 78:17	66:8	1
69:1 71:8 72:7	tragic 40:19	underlying 2:5	55:8	weaknesses	words 26:19	1 44:25 47:2
73:5,14 74:13	transaction 12:5	understand	violence 56:7	51:16,21,25	28:13 43:20	77:19 82:2,4
74:19 76:10	75:16	28:25 38:9,10	virtue 37:17	Webber 16:7	55:22 65:16	86:6
78:4 81:23	transactions	44:21 47:11	vis-a-vis 15:16	website 15:21,22	72:20	1.5 48:25
85:9 86:13	74:5,7 76:6,14	52:21 54:17	vocal 4:11	websites 75:9	work 8:6 21:19	

10 21:14,25 39:18 86:21,23 10's 20:14 100 58:18 100001657 8:17 11 44:23 117 80:6 12 8:20 74:13 76:20 13 31:2 53:22 83:6 14 10:9 53:22 80:6 86:24 16 74:20 84:14 16.29 18:19 163 8:11 163-odd 7:12 1679 9:21 10:4 17 8:13,14 10:4 18:8 45:9 47:3 17.20 21:6 19 67:21 1994 54:13 1997 57:15 1998 28:4	3 44:22 70:23 79:20 83:10 3.15 49:22 3.24 49:24 37 59:16 80:25 81:5 <hr/> 4 <hr/> 4 17:24 18:1,2 4.22 86:22 40th 43:7 44 79:24 46 79:25 49 83:6,11 <hr/> 5 <hr/> 5 72:2 5th 26:12 50 46:3 52 74:5 55 75:18 80:13 56 81:5 <hr/> 6 <hr/> 6 50:1 78:25 6th 26:13 <hr/> 7 <hr/> 74 72:2 76 81:11 <hr/> 8 <hr/> 8 26:14 78:21 80 16:8 67:23 <hr/> 9 <hr/> 9 82:5 9th 26:15 90 3:14,17 4:8 92 3:14 5:8 14:22 98 56:14 99 58:18,22 61:22					
<hr/> 2 <hr/> 2 83:8,10 85:6,22 2.00 1:2 2000 54:22 2003 78:22 83:13 2004 1:6,11 78:25 83:2 2005 25:14 2006 2:2,11 24:23 25:15 30:10,20,21,23 34:3,3 40:2 42:10 43:2,6 44:12 73:9,14 73:19 74:15,21 76:23 77:2,9 79:15 80:2,4 84:16 2007 29:1,4 44:22 2008 44:24,25 45:9 47:2,3 2009 3:6 25:24 26:9 27:25 2010 4:19 5:5,19 8:20 10:9 2011 3:4 18:19 25:22 30:21 31:2 33:18 34:2,7 35:10 77:2,11 80:4 2012 32:11 43:10 83:6 86:24 21 9:5 18:10 27 18:19 20:21 20:22 36:17 28 22:1,6 29 30:9 43:14 <hr/> 3						

# **EXHIBIT R**

<p>1 A. No.</p> <p>2 Q. The 2005 election, Mr Murdoch. This is the last of</p> <p>3 Blair's victories.</p> <p>4 Did you make it a condition of support for the</p> <p>5 Labour Party that the government hold a referendum on</p> <p>6 the new EU Constitution?</p> <p>7 A. No, we didn't make any conditions, but we certainly</p> <p>8 expressed the opinion strongly that the EU Constitution</p> <p>9 should be put to the people. And I don't think we were</p> <p>10 alone in that. As it happened, didn't have to be,</p> <p>11 because it depended on unanimity between all the</p> <p>12 countries and other countries, at least one, had voted</p> <p>13 against it, so it was pointless to have a referendum.</p> <p>14 Q. Yes. In the end, as you rightly say, there wasn't</p> <p>15 a referendum for the reasons you've given, but what's</p> <p>16 said in another book by a Mr Richards this time is that</p> <p>17 Mr Blair held regular talks with Irwin Stelzer,</p> <p>18 including talks on that issue, and Mr Stelzer would have</p> <p>19 been communicating your views. Is that right or not?</p> <p>20 A. No. Mr Stelzer is a distinguished economist. He had</p> <p>21 his own views.</p> <p>22 Q. But in no sense was he communicating your views then to</p> <p>23 the Prime Minister, is that --</p> <p>24 A. No.</p> <p>25 LORD JUSTICE LEVESON: Well, you don't know whether he was</p> <p style="text-align: center;">Page 85</p>	<p>1 Q. According to Mr Blair's biography, "A Journey",</p> <p>2 page 655, it's just a couple of sentences, I do not</p> <p>3 think it's necessary to turn it up, Mr Blair's view is:</p> <p>4 "There was no contest for the leadership. John Reid</p> <p>5 could have stood, but the Murdoch papers, I fear at</p> <p>6 Rupert's instigation, just wrote him off."</p> <p>7 Do you remember doing that?</p> <p>8 A. No, that's quite untrue. I had met Mr Reid a couple of</p> <p>9 times and I liked him and admired him.</p> <p>10 Q. But you didn't write him off?</p> <p>11 A. I didn't know that he was a contender for the job. Or</p> <p>12 possible contender.</p> <p>13 Q. Okay. Your relations with Mr Brown until 30 September</p> <p>14 2009, which was when the Sun, as it were, dropped him</p> <p>15 and supported the Conservatives, were quite warm,</p> <p>16 weren't they?</p> <p>17 A. My personal relationship with Mr Brown --</p> <p>18 Q. Yes.</p> <p>19 A. -- was always warm, both before he became Prime Minister</p> <p>20 and after, and I regret that, after the Sun came out on</p> <p>21 him, that's not so true, although I only hope that that</p> <p>22 can be repaired.</p> <p>23 Q. There may have been a number of reasons why your</p> <p>24 personal relations were good, but one obvious one,</p> <p>25 perhaps, was your common Presbyterian upbringing; is</p> <p style="text-align: center;">Page 87</p>
<p>1 or he wasn't.</p> <p>2 A. He may have been. I don't know.</p> <p>3 LORD JUSTICE LEVESON: That's the point.</p> <p>4 A. It would have been a coincidence.</p> <p>5 LORD JUSTICE LEVESON: But it would be something that you</p> <p>6 would talk to him about?</p> <p>7 A. If I was seeing a lot of him.</p> <p>8 LORD JUSTICE LEVESON: That's the point. You've already</p> <p>9 spoken very, very highly of him, and therefore it's the</p> <p>10 sort of thing you might very well discuss with him?</p> <p>11 A. Yes. Yes, sir.</p> <p>12 MR JAY: Thank you.</p> <p>13 A. My only point in answering Mr Jay was that he was not</p> <p>14 there to carry a message from me.</p> <p>15 LORD JUSTICE LEVESON: (Nods head). I understand.</p> <p>16 MR JAY: I'm sure Dr Irwin Stelzer with all his intellectual</p> <p>17 abilities would have his own ideas on this and every</p> <p>18 other topic, but in one sense he would know your</p> <p>19 thinking and he would be able to discuss that with</p> <p>20 Mr Blair, wouldn't he?</p> <p>21 A. Probably, yes. He was actually closer to Mr Andrew Neil</p> <p>22 than he was to me.</p> <p>23 Q. Okay. Mr Blair leaves in 2007. Did you have a view as</p> <p>24 to who should succeed him?</p> <p>25 A. I thought the matter was settled.</p> <p style="text-align: center;">Page 86</p>	<p>1 that right?</p> <p>2 A. Yes.</p> <p>3 Q. Can we see if we can possibly explode one of the myths</p> <p>4 you've mentioned? We know that you stayed at Chequers</p> <p>5 the weekend of 6 and 7 October 2007, or were at least</p> <p>6 there on one of those days. Do you remember that?</p> <p>7 A. Was that the pyjama party weekend?</p> <p>8 Q. No. We're coming to that. That's 14 June 2008,</p> <p>9 Mr Murdoch. No, this is --</p> <p>10 A. I do remember being once, at least, but I think only</p> <p>11 once, at Chequers as the guest of Mr and Mrs Brown, and</p> <p>12 there were certainly other people there, because</p> <p>13 I remember -- the outstanding thing in my memory was it</p> <p>14 was the first time I met JK Rowling, who was a close</p> <p>15 friend of -- at least of Mrs Brown.</p> <p>16 Q. Did you have any discussions with Mr Brown about whether</p> <p>17 there should be a snap election?</p> <p>18 A. No.</p> <p>19 Q. Were you aware of the --</p> <p>20 A. Let me say I don't remember any and I'm sure he didn't</p> <p>21 ask me. No.</p> <p>22 Q. There is evidence somewhere, I think in Mr Rawnsley's --</p> <p>23 A. No, if any politician wanted my opinions on major</p> <p>24 matters, they only had to read the editorials in the</p> <p>25 Sun.</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

<p>1 Q. Mr Rawnsley, page 507, says that the decision to call 2 off the snap election was taken before 6 October. If 3 he's right, you couldn't have discussed it with 4 Mr Brown, but maybe we can't really --</p> <p>5 A. So who says I did?</p> <p>6 Q. Others have suggested it, but we've heard your evidence 7 on the topic, Mr Murdoch. I'm not going to press that 8 any further, if you forgive me.</p> <p>9 Can I move forward with Mr Brown. June 2008, if we 10 can take just one month, the documents demonstrate that 11 you had dinner with Mr Brown on 6 June and your 12 respective wives were present. Would you accept that?</p> <p>13 A. Yes.</p> <p>14 Q. 14 June was the famous slumber party, where I don't 15 believe you were present.</p> <p>16 A. I think they were just a bunch of women complaining 17 about their husbands, probably.</p> <p>18 Q. 15 June, you were Mr Brown's guest at a Downing Street 19 dinner for President Bush, do you remember that?</p> <p>20 A. Yes. That was a large party. I mean, there was --</p> <p>21 Q. Yes, There'd be about 30 or 40 people there, wouldn't 22 there?</p> <p>23 A. Yes, I'm sure there were other people there from the 24 press.</p> <p>25 Q. And then on 16 June, Mr Brown attends your annual summer Page 89</p>	<p>1 Inquiry received from Mr MacKenzie. Mr MacKenzie told 2 us that Mr Brown spoke to you on the phone, this was on 3 or shortly after 30 September 2009 and he, Mr Brown, is 4 said to have roared at you for 20 minutes. Is that true 5 or not?</p> <p>6 A. I am afraid that -- I'm very happy to tell you about the 7 conversation, but Mr MacKenzie, who I might have talked 8 to about it over dinner, I occasionally see him -- that 9 was a very colourful exaggeration. Mr Brown did call me 10 and said, "Rupert, do you know what's going on here?" 11 And I said, "What do you mean?" He said, "Well ..." the 12 Sun and what it's doing and how it came out, and I said, 13 "I'm not aware of the -- I was not warned of the exact 14 timing, I'm not aware of what they're saying, I'm 15 a long, long way away, but I'm sorry to tell you, 16 Gordon, we have come to the conclusion that we will 17 support a change of government when and if there's an 18 election." Not "if", but "when there's an election". 19 And he said -- and I must stress no voices were raised, 20 we were talking more quietly than you and I are now -- 21 he said, "Well, your company has declared war on my 22 government and we have no alternative but to make war on 23 your company." And I said, "I'm sorry about that, 24 Gordon, thank you for calling", end of subject.</p> <p>25 Q. How could Mr Brown have declared war on your company? Page 91</p>
<p>1 party?</p> <p>2 A. Yes. I think so. Most people did.</p> <p>3 Q. Were you involved in any way in the timing of the 4 decision to support the Conservative party on 5 30 September 1989 [sic]?</p> <p>6 A. No, I was not consulted as the exact timing. We 7 certainly had had talks over a period -- my son James 8 and Mrs Brooks and no doubt others -- that we felt this 9 government was making a lot of mistakes and that we'd 10 had a long period of Labour rule and it was time for 11 a change.</p> <p>12 Q. And you, along with many others, were working out that 13 Mr Brown was likely to lose the next election?</p> <p>14 A. No. I didn't know.</p> <p>15 Q. Mr Murdoch, one can't know, because unless one can read 16 the future, there are uncertainties --</p> <p>17 A. I thought you were asking me to --</p> <p>18 Q. But your best guess, Mr Murdoch, along with many others, 19 best-informed guess, was that Mr Brown was going to 20 lose, wasn't he?</p> <p>21 A. The election was a long way away. I had no idea. You 22 know, as many people have said, a week is a long time in 23 politics.</p> <p>24 Q. That was Mr Howard Wilson, I think, who originally said 25 that. May I just deal with one piece of evidence the Page 90</p>	<p>1 A. I don't know. I don't think he was in a very balanced 2 state of mind. He, frankly -- he could have -- I don't 3 know -- set up more commissions. God knows there's 4 plenty of quangos and commissions around us now. So 5 that was it.</p> <p>6 He later, when the hacker scandal broke, made 7 a totally outrageous statement, which he had to know was 8 wrong, when he called us a "criminal organisation", and 9 because he said that we had hacked into his personal 10 medical records when he knew very well how the Sun had 11 found out about his son, the condition of his son, which 12 was very sad. A father from the hospital in a similar 13 position had called us, told us and said, "Shouldn't we 14 get some charity or research on this?", and so on, and 15 Mrs Brooks immediately snatched it from the news list 16 and said, "Let me handle this", and she called Mrs Brown 17 and said, "Look, this is going to be out, we should be 18 careful, how would you like it handled?" And I don't 19 know if it was one or several days later, we published 20 the story, and four or five days later, Mr Brown wrote 21 a personal letter to Mrs Brooks thanking her for her 22 sensitivity and the way she handled the story. 23 I believe that letter is in the hands of the police.</p> <p>24 Q. So, Mr Murdoch, you had no knowledge of and involvement 25 in the events you've just described. You, presumably, Page 92</p>

23 (Pages 89 to 92)

<p>1 are communicating to us what Mrs Brooks has told you; is 2 that correct?</p> <p>3 <b>A. On her handling of the story, and indeed I've since</b> 4 <b>had -- some time ago -- personal contact with Mrs Brown,</b> 5 <b>which was very friendly, and, yes, that part of the</b> 6 <b>story -- and I'm sure there's plenty of evidence that</b> 7 <b>she took it out of the news list and said, "Let me</b> 8 <b>handle that", other people would have been present, and</b> 9 <b>there would be people in the newsroom that would have</b> 10 <b>known, that would have received the call from the</b> 11 <b>hospital. I haven't seen the letter.</b></p> <p>12 Q. Okay.</p> <p>13 <b>A. But I have no doubt you'll have a chance to do that.</b></p> <p>14 Q. May I go back --</p> <p>15 <b>A. Well, we're jumping several years.</b></p> <p>16 Q. It's fine, Mr Murdoch, but can I just go back to this 17 declaration of war? Could it be said that the way 18 Mr Brown might have carried out his threat -- perhaps 19 the way you interpreted it -- was that as and when you 20 would bid for the remaining publicly owned shares in 21 BSKyB, Mr Brown might place obstacles in your way?</p> <p>22 <b>A. No, we never thought about it. We had taken advice on</b> 23 <b>that. It's something that goes on, I guess, every day,</b> 24 <b>if not every week. Somewhere in the markets of the</b> 25 <b>world, controlling shareholders buy in the outside</b></p> <p style="text-align: center;">Page 93</p>	<p>1 <b>monetary pressures which encouraged it.</b></p> <p>2 Q. I just wonder though, Mr Murdoch, whether it entered 3 into your thinking that Mr Brown had said, "We're going 4 to declare war on your company", that you interpreted 5 that as being, at the very least, the possibility of 6 obstacles being placed in the way of your bid for the 7 remaining shares in BSKyB?</p> <p>8 <b>A. No, that never occurred to me.</b></p> <p>9 Q. Didn't it?</p> <p>10 <b>A. No.</b></p> <p>11 MR JAY: Sir, would that be --</p> <p>12 LORD JUSTICE LEVESON: Yes, certainly.</p> <p>13 MR JAY: May I say --</p> <p>14 <b>A. Certainly not.</b></p> <p>15 MR JAY: I'll say what I had in mind for the rest of --</p> <p>16 LORD JUSTICE LEVESON: Yes.</p> <p>17 No, I think Mr Jay was just suggesting we should 18 break. Nothing more.</p> <p>19 <b>A. Well, I hope we can get through today.</b></p> <p>20 MR JAY: Mr Murdoch, I'm concerned about the length of --</p> <p>21 <b>A. It's up to you.</b></p> <p>22 MR JAY: I'm concerned overall about the length of this 23 evidence and, if we plough through the afternoon, how 24 cogent my questions will be and your answers might be. 25 I know how much I have left. My preference would be to</p> <p style="text-align: center;">Page 95</p>
<p>1 <b>shareholders. It's not a matter for regulation in most</b> 2 <b>countries or any country that I'm aware of. It was</b> 3 <b>turned into a political issue in this country by our</b> 4 <b>newspaper enemies -- or I shouldn't say "enemies".</b> 5 <b>Competitors. But it is possible, of course, for the</b> 6 <b>Minister for Culture to step in, I presume, and refer</b> 7 <b>any market move to Ofcom or the Competition Commission</b> 8 <b>or whatever. But we'd never thought of that.</b></p> <p>9 Q. Mm.</p> <p>10 <b>A. I mean, we thought -- to be quite honest with you --</b> 11 <b>that we'd be held up for a couple of months in Europe</b> 12 <b>and there was just nothing here; and, in fact, we were</b> 13 <b>waved through in Europe in two weeks.</b></p> <p>14 Q. Can I just understand the chronology, Mr Murdoch, that 15 by 30 September 2009, had there been keen internal 16 consideration within News Corp regarding the acquisition 17 of the remaining shares in BSKyB?</p> <p>18 <b>A. Oh, well, there had certainly been a desire there for</b> 19 <b>a long time. I remember when Mr Carey returned to the</b> 20 <b>company after many years away, the first thing he said</b> 21 <b>to me was, "We should clean up this situation at Sky" --</b> 22 <b>or BSKyB. It was a -- you know, we started this company</b> 23 <b>and it was a longstanding ambition. With hindsight,</b> 24 <b>I regret that I ever agreed to an IPO, although I admit</b> 25 <b>that they were different times and there were probably</b></p> <p style="text-align: center;">Page 94</p>	<p>1 go just for about 45 minutes in the afternoon and then 2 complete in about two or three hours in the morning.</p> <p>3 LORD JUSTICE LEVESON: Can I suggest that during the course 4 of the next hour you have a word with those who are 5 advising Mr Murdoch and he can have a word with them as 6 well. I'm conscious that I do not want to put excessive 7 pressure on you and I don't want to put excessive 8 pressure on Mr Murdoch either.</p> <p>9 <b>A. Thank you, sir.</b></p> <p>10 LORD JUSTICE LEVESON: All right. You can return to that at 11 2 o'clock. Thank you very much.</p> <p>12 (12.59 pm)</p> <p>13 (The luncheon adjournment)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)

# EXHIBIT S



[Sign into the Guardian using your Facebook account](#)

**theguardian**

# James Murdoch misled MPs, say former NoW editor and lawyer

Colin Myler and Tom Crone challenge News Corp executive's statement to MPs at phone-hacking hearing

Lisa O'Carroll and Patrick Wintour  
guardian.co.uk, Thursday 21 July 2011 15.02 EDT

James Murdoch has been accused of misleading the parliamentary select committee this week in relation to phone hacking, igniting yet another fire for the embattled News International boss to extinguish.

In a highly damaging broadside, two former News of the World senior executives claimed the evidence Murdoch gave to the committee on Tuesday in relation to an out-of-court settlement to Gordon Taylor, chief executive of the Professional Footballers Association, was "mistaken".

The statement came as something of a bombshell to the culture, sport and media select committee, which immediately announced it would be asking Murdoch to explain the contradiction.

Colin Myler, editor of the paper until it was shut down two weeks ago, and Tom Crone, the paper's former head of legal affairs, said they had expressly told Murdoch of an email that would have blown a hole in its defence that only one "rogue reporter" was involved in the phone-hacking scandal.

This contradicts what Murdoch told the committee when questioned on Tuesday.

The existence of the email, known as the "for Neville" email because of its link to the paper's former chief reporter Neville Thurlbeck, is thought to have been critical in News International's decision to pay out around £700,000 to Taylor in an out-of-court settlement after he threatened to sue the paper.

James Murdoch is standing by his version of events. A statement issued by News Corporation said: "James Murdoch stands by his testimony to the select committee."

In their statement, Myler and Crone challenged this: "Just by way of clarification relating to Tuesday's Culture, Media Select Committee hearing, we would like to point out that James Murdoch's recollection of what he was told when agreeing to settle the Gordon Taylor litigation was mistaken.

"In fact, we did inform him of the 'for Neville' email which had been produced to us by Gordon Taylor's lawyers."

John Whittingdale, the chairman of the culture, sport and media select committee, said: "We as a committee regarded the 'for Neville' email as one of the most critical pieces of evidence in the whole inquiry. We will be asking James Murdoch to respond and ask him to clarify."

He added that "it was seen as one of the few available pieces of evidence showing that this activity was not confined just to Clive Goodman", the only journalist on the paper to have been prosecuted – and jailed – in relation to phone hacking so far.

The email is believed to have been critical in News International's decision to pay Taylor such a large sum of money.

If it had got out in a full-blown court case brought by the Professional Footballers' Association chief executive it would have blown a hole in News International's claim that only one reporter was involved in hacking.

James Murdoch claimed to the MPs that this email had been concealed from him by two company executives, Crone and Myler, when he was persuaded to sign off the secret deal with Taylor.

Earlier this month James Murdoch acknowledged he was wrong to settle the suit, saying he did not "have a complete picture of the case" at the time.

He repeated this on Tuesday at the select committee when he was asked by Labour MP Tom Watson: "When you signed off the Taylor payment, did you see or were you made aware of the full Neville email, the transcript of the hacked voicemail messages?"

To this James Murdoch answered: "No, I was not aware of that at the time."

Watson went on to ask him why then had he paid an "astronomical sum" to Taylor.

James Murdoch replied: "There was every reason to settle the case, given the likelihood of losing the case and given the damages – we had received counsel – that would be levied."

With parliament in recess, it is unlikely but not unprecedented for a select committee to hold a special evidence session to clarify the issue.

Witnesses in the case have been given very strict instructions before giving evidence to tell the truth, although witnesses do not give evidence under a specific oath.

James Murdoch told the committee that his advisers had urged him to adopt a strategy of telling the truth when he spoke to the committee.

In its 2010 report the culture, sport and media select committee, in discussing the Gordon Taylor settlement, wrote: "The settlements were authorised by James Murdoch, executive chairman of News International, following discussions with Colin Myler and Tom Crone".

It did not specifically state whether Murdoch had been shown the "for Neville" email before making the settlement, but does state Murdoch was authorised to make the payment without bringing the issue to the News International board.

• To contact the MediaGuardian news desk email [editor@mediaguardian.co.uk](mailto:editor@mediaguardian.co.uk) or phone 020 3353 3857. For all other inquiries please call the main Guardian switchboard on 020 3353 2000. If you are writing a comment for publication, please mark clearly "for publication".

• To get the latest media news to your desktop or mobile, follow MediaGuardian on [Twitter](#) and [Facebook](#)

## **Ads by Google**

**Breaking: Mitt Romney**

New report shows he didn't leave Bain Capital in 1999 as he claimed.

[barackobama.com/romney-bain-record](http://barackobama.com/romney-bain-record)

**#1 News Release Traffic**

# **EXHIBIT T**


**METROPOLITAN  
POLICE**
**TOTAL POLICING**


## Statement from Commissioner

06 July 2011


**Statement from Sir Paul Stephenson, Metropolitan Police Commissioner:**

In view of the widespread media coverage and public interest, I am taking the unusual step of issuing this statement.

As you know Operation Weeting - the investigation into phone hacking - commenced on 26 January. I can confirm that on 20 June 2011 the MPS was handed a number of documents by News International, through their barrister, Lord Macdonald QC.

Our initial assessment shows that these documents include information relating to alleged inappropriate payments to a small number of MPS officers.

Discussions were held with the Independent Police Complaints Commission (IPCC) at the time and they are content that this matter should continue to be investigated through Operation Elveden under the direction of DAC Sue Akers, in partnership with our Directorate of Professional Standards.

At this time we have not seen any evidence requiring a referral to the Metropolitan Police Authority (MPA) in respect of any senior officer.

Whilst I am deeply concerned by recent developments surrounding phone hacking they are a product of the meticulous and thorough work of Operation Weeting, which will continue.

Operation Elveden will be equally thorough and robust. Anyone identified of wrongdoing can expect the full weight of disciplinary measures and if appropriate action through the criminal courts.

### More

- [News & Appeals](#)
- [News](#)
- [Appeals](#)

[Home](#) [Your Borough](#) [Contact Us](#) [News & Appeals](#) [About Us](#) [Advice](#) [Careers](#) [Home](#) [News & Appeals](#) [Statement from Commissioner](#)



[About this site](#)
[A-Z index](#)
[Links](#)
[Sitemap](#)
[Accessibility](#)
[Privacy](#)
[© Mayor's Office for Policing and Crime 2012](#)
[YouTube](#)
[Twitter](#)
[Flickr](#)
[Facebook](#)
[Text size](#)  
[Mayor's Office for Policing and Crime](#)
[Crimestoppers](#)
[Facewatch](#)
[Other languages](#)

- [a](#)
- [a](#)

### Text colour

- [a](#)
- [a](#)
- [a](#)
- [a](#)

[Del.icio.us](#)
[StumbleUpon](#)
[Digg](#)
[Reddit](#)
[Technorati](#)

# **EXHIBIT U**

<p>1 Monday, 23 July 2012</p> <p>2 (10.00 am)</p> <p>3 LORD JUSTICE LEVESON: Yes, Mr Jay?</p> <p>4 MR JAY: Sir, first of all, we're going to have an update</p> <p>5 from DAC Akers, please.</p> <p>6 LORD JUSTICE LEVESON: Thank you very much indeed.</p> <p>7 DAC SUE AKERS (recalled)</p> <p>8 Questions by MR JAY</p> <p>9 LORD JUSTICE LEVESON: You've twice given evidence before,</p> <p>10 Deputy Assistant Commissioner, I'd be grateful if you</p> <p>11 bear in mind you're still subject to the oath you took</p> <p>12 at the beginning.</p> <p>13 A. Yes, sir.</p> <p>14 MR JAY: Deputy Assistant Commissioner, you've kindly</p> <p>15 provided the Inquiry with a further witness statement</p> <p>16 dated 20 July under the standard statement of truth; is</p> <p>17 that right?</p> <p>18 A. Yes.</p> <p>19 LORD JUSTICE LEVESON: So that it's quite clear, this</p> <p>20 statement, as indeed each of the others, has been</p> <p>21 provided following notice issued under Section 21 of the</p> <p>22 Inquiries Act.</p> <p>23 A. Yes, sir.</p> <p>24 LORD JUSTICE LEVESON: Thank you.</p> <p>25 MR JAY: Paragraph 4 of the statement, first of all. You</p> <p style="text-align: center;">Page 1</p>	<p>1 Then Mr Lewis and Mr Greenberg were introduced to help</p> <p>2 facilitate the co-operation, which they did. And in</p> <p>3 mid-May this year, following a development in our</p> <p>4 investigation, it caused the MSC to reconsider their</p> <p>5 position and they decided that they would prefer the</p> <p>6 meetings to be on a more formal basis with lawyers only.</p> <p>7 I should say, that hasn't affected the co-operation,</p> <p>8 which is still very good.</p> <p>9 Q. Thank you. You explain in paragraph 9 in mid-May of</p> <p>10 this year there was a development in your investigation,</p> <p>11 which appears to have caused the MSC to reconsider their</p> <p>12 relationship with you. And there was a pause for</p> <p>13 several weeks in the voluntary disclosure material to</p> <p>14 you. But a meeting took place on 1 June, Lord Grabner</p> <p>15 and other lawyers acting for the MSC, and voluntary</p> <p>16 disclosure resumed. So the pause was for two or three</p> <p>17 weeks; is that right?</p> <p>18 A. Yes. The pause was from the middle of May until –</p> <p>19 I think we then got more disclosure in the middle</p> <p>20 of June. 14 June, I think, was when we got our next</p> <p>21 disclosure. And it's continued since that date.</p> <p>22 Q. In terms of the resources, you observe in paragraph 10</p> <p>23 that the Management Standards Committee have committed</p> <p>24 significant resources to assist these investigations,</p> <p>25 continuing to co-operation and disclose documentation;</p> <p style="text-align: center;">Page 3</p>
<p>1 continue to lead all the operations. These, of course,</p> <p>2 are Operations Weeting, Elveden and Tuleta; is that</p> <p>3 right?</p> <p>4 A. That's correct.</p> <p>5 Q. Paragraph 5, could I ask you to speak to that, please?</p> <p>6 A. Investigating all of these investigations – and they're</p> <p>7 numerous – we've worked obviously closely with the CPS,</p> <p>8 and they have advised us regarding potential offences.</p> <p>9 We've sought legal advice and in respect of both</p> <p>10 individual and corporate offences, and also in relation</p> <p>11 to our police powers and our options for investigating.</p> <p>12 Q. Thank you. To date, as you explain in paragraph 6,</p> <p>13 you've primarily been seeking the co-operation of</p> <p>14 News International. Indeed the subsidiary company, NGN</p> <p>15 as well, I suppose. But your dealings with the</p> <p>16 Management Standards Committee, you explain that at the</p> <p>17 end of June of this year, a Mr Zweifach replaced</p> <p>18 Mr Klein; is that right?</p> <p>19 A. That's correct.</p> <p>20 Q. Can you help us with paragraph 8. Mr Lewis and</p> <p>21 Mr Greenberg no longer attend the regular meetings. Can</p> <p>22 you remember about when that change took place?</p> <p>23 A. It took place fairly recently. At the beginning, when</p> <p>24 we began the enquiries, all contact was through the</p> <p>25 lawyers; then these were other lawyers, Burton Copeland.</p> <p style="text-align: center;">Page 2</p>	<p>1 a professional and productive relationship and not</p> <p>2 without its challenges.</p> <p>3 Operation Weeting now, paragraph 12. You explain</p> <p>4 the background. In paragraph 13, could you sum up the</p> <p>5 position there as to the number of people who have been</p> <p>6 arrested and when the bail has to be renewed or</p> <p>7 reconsidered?</p> <p>8 A. Yes. 15 current and former journalists have been</p> <p>9 arrested and interviewed in relation to conspiracy to</p> <p>10 intercept communications. 12 of those remain on</p> <p>11 pre-charge bail, 11 of whom are due to return to various</p> <p>12 police stations tomorrow, 24 July, other than one</p> <p>13 individual who has been bailed to 2 August. One</p> <p>14 non-journalist has also been bailed to tomorrow,</p> <p>15 24 July.</p> <p>16 Files in respect of all of these individuals are</p> <p>17 currently with the CPS for advice as to potential</p> <p>18 charges.</p> <p>19 Q. Thank you. The perverting the course of justice matter,</p> <p>20 I think we all understand what that relates to and who</p> <p>21 the individuals are, but you've been careful not to name</p> <p>22 them. It's summarised in paragraph 14; is that right?</p> <p>23 A. Yes.</p> <p>24 Q. We can just note that.</p> <p>25 Paragraph 15, the non-journalist; you want to change</p> <p style="text-align: center;">Page 4</p>

<p>1 paragraph 14 to paragraph 13?</p> <p>2 A. Yes, the re-numbering has caused us to miss that. That</p> <p>3 should read "the non-journalist referred to at</p> <p>4 paragraph 13".</p> <p>5 Q. You make it clear there that the alleged offence relates</p> <p>6 to money-laundering matters, and the bail has been</p> <p>7 extended to tomorrow's date.</p> <p>8 Paragraphs 16 and 17, I think you've already covered</p> <p>9 that satisfactorily?</p> <p>10 A. I think I have.</p> <p>11 Q. Unless there's anything else you'd like to add?</p> <p>12 A. No.</p> <p>13 Q. We're moving forward to Operation Elveden, which starts</p> <p>14 at paragraph 18 of your statement. May I invite you,</p> <p>15 please, to sum up the position there. It's</p> <p>16 paragraph 19.</p> <p>17 A. Yes. Elveden to date has conducted 41 arrests. Broken</p> <p>18 down, that's 23 current or former journalists, four</p> <p>19 police officers, nine current or former public officials</p> <p>20 and five individuals who acted as conduits for corrupt</p> <p>21 payments. There are currently files at the CPS for</p> <p>22 three police officers and one journalist. And we're</p> <p>23 continuing to supply the CPS with files as we get them</p> <p>24 ready.</p> <p>25 Q. The CPS are continuing to advise. There's a range of</p> <p style="text-align: center;">Page 5</p>	<p>1 stories were published.</p> <p>2 In this case, the individual's former partner has</p> <p>3 acted as the conduit and facilitated the payments into</p> <p>4 their bank account. And that bank account, from the</p> <p>5 former partner, reveals numerous payments from</p> <p>6 News International, Trinity Mirror and Express</p> <p>7 Newspapers between April 2010 and June 2011. And those</p> <p>8 payments total nearly £35,000.</p> <p>9 There were in fact further payments after the prison</p> <p>10 officer retired, which he did in June last year. The</p> <p>11 last of which was made by Express Newspapers in February</p> <p>12 this year.</p> <p>13 Q. Thank you. And paragraph 23, you say that co-operation</p> <p>14 from the MSC has enabled you to identify the stories to</p> <p>15 which the News International payments related, and</p> <p>16 further investigation has enabled you to identify</p> <p>17 stories in the Daily Mirror, the Sunday Mirror, the</p> <p>18 Daily Star and the Sunday Star that are suspected to be</p> <p>19 linked to the payments?</p> <p>20 A. Yes, that's right, sir.</p> <p>21 Q. Again, in the same way as you carefully dealt with</p> <p>22 paragraph 22, can you do the same, please, for</p> <p>23 paragraph 24?</p> <p>24 A. Yes. This describes another case we're investigating,</p> <p>25 where again the public official is a prison officer at</p> <p style="text-align: center;">Page 7</p>
<p>1 offences there, which of course will be familiar to the</p> <p>2 Inquiry and to criminal lawyers, but the</p> <p>3 money-laundering, apart from the well-known corruption</p> <p>4 offences and new Bribery Act offences, and before the</p> <p>5 Bribery Act, it was of course the Prevention of</p> <p>6 Corruption Act.</p> <p>7 Can I ask you, please, about paragraph 21, if</p> <p>8 I could ask you to summarise that?</p> <p>9 A. Yes. Before I do, when I go on to talk about</p> <p>10 developments in our investigation, I have in some cases</p> <p>11 used the word "alleged" but I haven't repeated it</p> <p>12 throughout. I think I said this on a previous occasion</p> <p>13 when I gave evidence. Where I talk about these</p> <p>14 developments, what I say is a matter of allegation and</p> <p>15 not established fact.</p> <p>16 In relation to Elveden then, our ongoing</p> <p>17 investigation has recently revealed that in some cases</p> <p>18 where we've identified a public official who's received</p> <p>19 payments from News International, we've also established</p> <p>20 that they have received payments from other newspapers.</p> <p>21 Q. Thank you. I'm going to ask you now to deal with</p> <p>22 paragraph 22 in some detail.</p> <p>23 A. This relates to one case where the public official was</p> <p>24 a prison officer at a high security prison during the</p> <p>25 periods when the payments were made and the related</p> <p style="text-align: center;">Page 6</p>	<p>1 a different high security prison. And again, that</p> <p>2 individual's partners has facilitated the payments into</p> <p>3 their account. These payments are from Trinity Mirror.</p> <p>4 They were made between February 2006 and January 2012,</p> <p>5 and the total amount in this case was in excess of</p> <p>6 £14,000. Again, further investigation has enabled us to</p> <p>7 identify stories in the Daily Mirror which we think are</p> <p>8 linked to those payments.</p> <p>9 Q. Thank you. In paragraph 25, the assessments you've made</p> <p>10 to date, could you explain those to us, in particular</p> <p>11 the public interest aspect?</p> <p>12 A. Yes. As I say, ultimately the public interest test is</p> <p>13 a matter for the CPS, but we make an assessment</p> <p>14 ourselves as well around public interest as to whether</p> <p>15 the alleged criminal conduct can be justified as being</p> <p>16 in the public interest, as well as whether there are</p> <p>17 grounds to suspect offences.</p> <p>18 It's our assessment that there are reasonable</p> <p>19 grounds to suspect that offences have been committed and</p> <p>20 that the majority of these stories reveal very limited</p> <p>21 material of genuine public interest.</p> <p>22 Q. Thank you. On 11 July -- obviously only two weeks ago</p> <p>23 or slightly less -- following the arrests of one</p> <p>24 employee of Trinity Mirror and one employee of Express</p> <p>25 News Group, letters were served on the head of legal for</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 those newspapers requesting specific evidential 2 material. Can I ask you, please, to explain what has 3 happened and to update us as to progress and 4 co-operation with those companies?</p> <p>5 A. Yes. We've — we asked for a response by 18 July to our 6 request for evidential material, which we think are in 7 the possession and control of both Trinity Mirror and 8 Express News Group. We've had those responses.</p> <p>9 Trinity Mirror Group have asked us to obtain 10 a production order and indicated that they won't oppose 11 that. Express Newspapers have taken a slightly 12 different stance. They wish to proceed by way of 13 voluntary protocol, which would be more akin to how 14 we've co-operated with News International. And at the 15 moment we're in the process of drafting that voluntary 16 protocol.</p> <p>17 Q. Thank you. In paragraph 27, further lines of inquiry 18 may result in further arrests.</p> <p>19 In paragraph 28 now, Deputy Assistant Commissioner, 20 can you explain what's happening with Elveden and the 21 MSC, in particular the Sun newspaper?</p> <p>22 A. Yes. These paragraphs I'm attempting to explain, as 23 asked in my Section 21, how co-operation has worked.</p> <p>24 We opened our investigation, as we say, on the basis 25 of full co-operation, and the MSC then conducted their</p> <p style="text-align: center;">Page 9</p>	<p>1 that, despite challenges, quite correct and proper 2 challenges, the co-operation continues and we have 3 recently received a substantial amount of material.</p> <p>4 Q. Thank you. In paragraph 31 you refer to an internal 5 review the MSC have conducted of their own volition, but 6 that has yielded no further evidence for you; is that 7 right?</p> <p>8 A. Well, the MSC would say the result of the review was the 9 material that they had disclosed to us, but we haven't 10 received or — I understand there is no formal report as 11 a result of their review.</p> <p>12 Q. Okay. May we move forward to Operation Tuleta, and 13 I ask you, please, first of all in paragraph 33 to 14 summarise where we are. It's paragraphs 33 and 34.</p> <p>15 A. Yes. "Tuleta" is a kind of over-arching name for 16 a number of discrete investigations. We're conducting 17 an assessment of 101 separate allegations of data 18 intrusion. These include allegations of phone hacking, 19 computer hacking, improper access to medical, banking 20 and other personal records.</p> <p>21 In order to undertake this assessment, we've 22 collated relevant documentation from previous inquiries 23 and looked at electronic storage devices which had been 24 previously seized in other inquiries. And we're 25 gathered between 8 and 12 terabytes of data across 70</p> <p style="text-align: center;">Page 11</p>
<p>1 own internal review of the Sun, which was not a request 2 made by us, but they did it nevertheless.</p> <p>3 As a result of that, they voluntarily provided a lot 4 of documentation, which evidenced suspected criminality 5 and which led to a couple of individual arrests and then 6 to very substantial arrest days, which were highly 7 publicised. They were on 28 January this year and then 8 again on 11 February, and involved the Sun newspaper.</p> <p>9 Following that, those two arrest days, there was 10 considerable adverse publicity of both the MPS, the 11 police and the MSC, including threats of legal action 12 against the MSC.</p> <p>13 Following that, there was a change in the nature of 14 the co-operation. We were being asked perhaps to 15 justify our requests to a degree that we perhaps 16 formerly hadn't been, and the material that we were 17 requesting was slower in being forthcoming.</p> <p>18 The MSC were obviously very conscious to protect 19 legitimate journalistic sources, and of course the law 20 places very strict restrictions on the police obtaining 21 such material.</p> <p>22 The comments are we started on the basis of full 23 co-operation, so any change in that co-operation could 24 adversely affect initial decisions that we'd made and 25 arrests that were made as well. But I should stress</p> <p style="text-align: center;">Page 10</p>	<p>1 storage devices, which we're searching for evidence to 2 either support or contradict the allegations that have 3 been made by these 101 individuals. That's a very 4 substantial amount of documentation and data.</p> <p>5 I know the last time I was here I was hopeless in 6 answering your question as to what that might amount to, 7 so I've done some homework and a terabyte, if downloaded 8 in the form of a kind of normal-size paperback, which is 9 then piled on top of one another, I'm told the terabyte 10 amounts to three and a half times the height of Everest. 11 So between 8 and 12 terabytes, whilst leaving rather 12 a large margin of error, I agree, it's still 13 a substantial amount of documentation.</p> <p>14 LORD JUSTICE LEVESON: It creates its own problems for 15 analysis and research?</p> <p>16 A. It absolutely does, because we can't look at every piece 17 of documentation. We have to be careful about how we 18 search it and what criteria we put in that — in our 19 questions of the data.</p> <p>20 LORD JUSTICE LEVESON: Yes.</p> <p>21 A. But continuing on, sir, to date we've made six arrests 22 under the Computer Misuse Act and/or in respect of 23 offences of handling stolen goods, subjects of which are 24 all on police bail pending completion of the arrest 25 phase and further investigation. As in the other cases,</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)



<p>1 in due course files will be submitted to the CPS for 2 charging advice.</p> <p>3 MR JAY: Thank you. The MSC have been one of the sources of 4 material for Operation Tuleta purposes. Then 5 paragraph 36, you explain what happened in April of this 6 year. Can I ask you, please, to tell us about that?</p> <p>7 A. Yes. As a result of the material that we've had 8 provided to us from the MSC, it seems that on occasions 9 we've found that material has been downloaded from and 10 is in possession of News International titles which 11 appear to have come from stolen mobile telephones.</p> <p>12 It appears from some of the documentation, and 13 that's dated around late 2010, that one of the mobile 14 phones has been examined with a view to breaking its 15 code, its security code, so that the contents can be 16 downloaded by experts. And obviously a significant and 17 important line of inquiry for us is to identify the 18 experts that have been used.</p> <p>19 Q. At the moment, as you say, their identities are unknown 20 to you but they're likely to exist in different parts of 21 the country.</p> <p>22 Paragraph 38, tell us about that, please, and then 23 lead into paragraph 39.</p> <p>24 A. We'll obviously request now further documentation from 25 the MSC as a result of what we've discovered in respect</p> <p style="text-align: center;">Page 13</p>	<p>1 you last gave evidence. Can I ask you, please, to 2 summarise paragraphs 42 to 46?</p> <p>3 A. Yes. I think the last time I gave evidence we were 4 still in the process of notifying victims and potential 5 victims of phone hacking. We've completed that process 6 now as far as we can insofar as we could identify the 7 victims who we think have been likely to have been 8 subjected to phone hacking. And so we've notified 9 a total of 2,615, of which 702 we think are likely to 10 have been victims.</p> <p>11 Q. Mm.</p> <p>12 A. We have a figure above 702 who we think are likely to 13 have been victims but, for one reason or another, we're 14 unable to contact those people. That's why there's 15 a discrepancy in the figures between paragraphs 44 and 16 45.</p> <p>17 MR JAY: Great, that's very clear. Thank you very much, 18 Deputy Assistant Commissioner.</p> <p>19 LORD JUSTICE LEVESON: Ms Akers, I received evidence of the 20 response which the police received when they visited 21 News International in 2006. Would it be right for me to 22 conclude at this stage that whatever might have happened 23 in the past at News International titles, the senior 24 management and corporate approach now has been to assist 25 and come clean, from which I might be able to draw the</p> <p style="text-align: center;">Page 15</p>
<p>1 of the stolen mobile phones, and we're hopeful that that 2 will produce further relevant information which will 3 then lead us to the expert services, and when we reach 4 them, at that point we hope to establish whether in fact 5 these are just isolated incidents or just the tip of an 6 iceberg.</p> <p>7 Q. Mm. Thank you.</p> <p>8 Paragraph 40, one mobile telephone theft took place 9 in Manchester and another in South West London, and this 10 may suggest that this is more than an isolated local 11 issue, but as you're careful to say, you're at a very 12 early stage in the investigation.</p> <p>13 A. Yes.</p> <p>14 Q. Paragraph 41, please, it's a similar pattern, I think, 15 with the co-operation of the MSC. It's now only lawyers 16 who --</p> <p>17 A. Yes. The co-operation is exactly the same in terms of 18 the make-up of the MSC team that deals with our offices, 19 and now we deal entirely through the lawyers.</p> <p>20 Q. You say that initially there was a challenge to 21 Operation Tuleta's request for information about the 22 apparent handling of the stolen phones and subsequent 23 downgrades, but now there's a willingness to assist.</p> <p>24 A. Yes, there is.</p> <p>25 Q. Victims next. You're taking the story forward from when</p> <p style="text-align: center;">Page 14</p>	<p>1 inference that there is a change in culture, practice 2 and approach?</p> <p>3 A. Yes, sir. I don't disagree with any of that.</p> <p>4 LORD JUSTICE LEVESON: Thank you.</p> <p>5 It is obviously very important that when I report, 6 and the exercise of this Inquiry will come to an end, as 7 I'm sure at some stage so will your operations, it has 8 the benefit of absolutely up-to-date information.</p> <p>9 Of course, I am not concerned about individuals at 10 this stage, I am merely concerned with what's gone on in 11 the past and what I might derive from that as to 12 culture, practice and ethics, and what impact that might 13 have on the future. But in order that I am absolutely 14 up-to-date as far as is possible, I would be grateful if 15 you would be prepared to return in the autumn so that 16 I know what the position is -- it's obviously 17 fast-moving -- and in that way at least can give those 18 who read my report the benefit of what that up-to-date 19 position is. I hope that won't cause you too much 20 inconvenience.</p> <p>21 A. No, sir, I'd be very happy to do so.</p> <p>22 LORD JUSTICE LEVESON: Thank you very much indeed. Thank 23 you.</p> <p>24 Right.</p> <p>25 MR JAY: Now 81 statements which we were planning to read in</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 today, but we've had a request from at least one core 2 participant that that be delayed until tomorrow on the 3 basis that they say there wasn't time to read them all. 4 LORD JUSTICE LEVESON: All right. 5 MR JAY: We can do that first thing tomorrow. 6 LORD JUSTICE LEVESON: All right. Does that prejudice 7 proceeding with the submissions that people want to make 8 at this stage? 9 MR JAY: (shakes head). 10 LORD JUSTICE LEVESON: They've all seen the statements, and 11 therefore, to such extent as they wish to, as that might 12 affect their submissions, then their submissions with be 13 tailored accordingly. 14 MR JAY: Yes. I imagine the submissions are going to be at 15 a higher level of generality. I don't know that, having 16 had no idea what topics are going to be addressed 17 orally, but I suspect it's going to make no difference 18 whatsoever. 19 LORD JUSTICE LEVESON: All right. 20 Before commencing the oral submissions that I have 21 invited at the end of this module, it is sensible if 22 I deal with the future progress of the Inquiry, and I do 23 so under three headings, that is to say: issues that 24 presently remain outstanding, the impact of Rule 13 of 25 the Inquiry Rules 2006 ("the Rules") and any further</p> <p style="text-align: center;">Page 17</p>	<p>1 present day can be established, they should do that 2 without further delay and in witness statement form. 3 Any other core participant will then be able to submit 4 a short statement in response, either from the title or 5 the journalist concerned. The purpose of this exercise 6 is necessarily limited. It would not be to require 7 titles to list when each journalist who made a request 8 to Mr Whittamore left the paper; it is only intended to 9 address the specific journalists that Mr Sherborne's 10 clients have identified who are still in their 11 employment. Nor would it be to require titles to prove 12 in general terms the history of their retention or 13 destruction of information acquired from Mr Whittamore, 14 in the absence of specific and recent evidence of use. 15 I am not in any event requiring that any of this be done 16 either by Mr Sherborne or the individual titles but 17 I will, of course, consider anything that emerges from 18 the exercise (in addition to the information which 19 Mr Dacre for Associated Newspapers Limited offered to 20 provide in writing) and it will form part of the 21 evidence." 22 As I understand it, that information has not yet 23 been provided to the Inquiry but is being pursued. It 24 only seems fair to put a deadline on it: if any other 25 core participant is able to deal with it, the evidence</p> <p style="text-align: center;">Page 19</p>
<p>1 developments. 2 Outstanding issues. 3 As I have just made clear to deputy Assistant 4 Commissioner Akers, it is important that my report is 5 based on what is then the most up-to-date information 6 about the progress of the criminal investigation. Thus, 7 without descending into who did what to whom or 8 offending the self-denying ordinance on the detail, the 9 extent of that investigation -- including how widely it 10 then ranges and what it has excluded -- may inform my 11 view about the culture, practice and ethics of at least 12 a section of the press. It is in those circumstances 13 that I make clear that I will issue another request 14 under Section 21 of the Inquiries Act 2005 ("the Act") 15 returnable on a date probably in September. Notice of 16 a hearing will be provided in good time to all core 17 participants to Modules 1 and 2, and they will have the 18 opportunity of submitting any evidence they wish to deal 19 with what is then reported. 20 There are three remaining issues in relation to 21 Operation Motorman. The first two arise from my ruling 22 on 11 June 2012, paragraph 11 of which reads: 23 "If Mr Sherborne's clients wish to provide the 24 Inquiry with such information as they have collated from 25 the Whittamore records where a continuous link to the</p> <p style="text-align: center;">Page 18</p>	<p>1 should be provided by the end of this month with 2 a response by any relevant newspaper by 10 September. 3 So as to ensure that there is no risk of work having to 4 be done twice, I also identify that date for the other 5 information that Mr Dacre offered to supply to which 6 I also refer in that ruling. 7 I do not anticipate that this evidence will require 8 oral elaboration and I anticipate that I will make it 9 part of the formal record of the Inquiry, along with 10 other statements that are being read into the record 11 when DAC Akers or whomsoever is then in charge of the 12 police inquiry provides the further update. 13 The third remaining issue arising out of Operation 14 Motorman flows from my ruling of 10 July 2012 concerning 15 the attitude of Associated Newspapers Limited to the 16 evidence revealed in the documentation seized from the 17 private detective Steve Whittamore. In short, I had 18 been concerned to learn whether any core participant 19 wished to argue that I could not use the Motorman 20 material to reach generic adverse conclusions about the 21 practice in general of the press perhaps because it was 22 be wrong to conclude, even on the balance of 23 probability, that breaches of Section 55 of the Data 24 Protection Act 1998 could have been established against 25 journalists. I then postulated three possible</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 approaches namely, first, that it is conceded that there 2 is prima facie evidence that journalists did act in 3 breach of Section 55 by seeking information which, prima 4 facie, could not be justified in the public interest. 5 The second position is that the core participant does 6 not want to advance a positive case contradicting the 7 first position. The third was that it is, in fact, 8 challenged that there is a prima facie case against 9 journalists that they acted in breach of the law. 10 Associated Newspapers Limited has now responded to that 11 ruling and made it clear that it adopts the second of 12 the three approaches: the open letter from its 13 solicitors to the Inquiry to that effect will be 14 published as part of the record. 15 Apart from the police investigations and Operation 16 Motorman, I recognise that there is real potential for 17 other evidence to be forthcoming. In a number of the 18 closing submissions, it has been suggested that one of 19 the consequences of the fast-moving nature of this 20 Inquiry has been an inability to challenge material 21 particularly where relevant witnesses have already given 22 evidence prior to new allegations being made. 23 That is to misunderstand how the Inquiry has 24 proceeded. It has always been open to core participants 25 (and others) to submit evidence to the Inquiry to answer Page 21</p>	<p>1 dealing with the position of the Metropolitan Police. 2 I did so specifically so that any challenge to that 3 approach could be tested by way of judicial review in 4 good time and without disrupting the timetable: see 5 paragraph 64 of the ruling of 1 May 2012. There has 6 been none and I intend to proceed accordingly. It is, 7 however, important to make public certain aspects of 8 this procedure. 9 First, Rule 13 provides that I may send a warning 10 letter to any person who I consider may be the subject 11 of criticism in my report and, by Rule 13(3), must not 12 include any explicit or significant criticism of 13 a person in the report unless I have sent such a letter 14 and provided the recipient with a reasonable opportunity 15 to respond. In the circumstances, I intend to send 16 letters under Rule 13 setting out criticisms which may 17 be made on the basis of what is considered to be 18 reasonably arguable on the facts and evidence canvassed 19 over the course of the Inquiry to date, the purpose 20 being to alert the recipients to the full range of 21 matters in respect of which further representations may 22 be made. What it is critical to appreciate, however, is 23 that it should not be thought by any recipient that the 24 specific criticisms which I consider to be reasonably 25 arguable will necessarily appear in that form (or, Page 23</p>
<p>1 allegations that have been made and, in appropriate 2 cases where the interests of fairness require, that 3 evidence will be published as part of the record of the 4 Inquiry. There have been a number of examples where 5 this has already happened and I am prepared for that 6 type of material to be provided to the Inquiry over the 7 weeks to come (albeit no later than the end of August 8 2012 in respect of evidence prior thereto). 9 One example will suffice. The Inquiry only learnt 10 of the existence of Matthew Sprake very recently, but 11 I am conscious that his evidence last week concerned, in 12 large part, the work which he had been employed to carry 13 out for The People. Further, it raised issues relating 14 to the responsibilities for the ethical decisions in 15 connection with its commissioning. Although I recognise 16 that it is now too late to serve a notice under Section 17 21 of the Act on the editor, Mr Lloyd Embley (who gave 18 evidence during the course of Module 1), should he wish 19 to provide his account of that relationship, dealing 20 with what Mr Sprake has said, I will, of course, 21 consider it. 22 Rule 13 of the rules. 23 On 1 May 2012, I handed down a ruling dealing with 24 my approach to Rule 13 of the rules, which 25 I supplemented three days later with a further ruling Page 22</p>	<p>1 indeed, necessarily at all) in the final report. 2 Warning letters are an inherent part of conducting 3 the Inquiry fairly and constitute the process of 4 ensuring that all those potentially subject to possible 5 criticism have the opportunity to respond. It may be 6 that it will be thought that submissions that have 7 already been made deal with the possible criticisms and 8 it will be sufficient either not to respond or simply to 9 refer to those submissions. At the other end of the 10 spectrum, representations can include the provision of 11 further evidence and I am prepared to consider the 12 possibility that I may have to reconvene oral hearings 13 to allow an appropriate response: see Beer, Public 14 Inquiries, paragraph 9.41. Having said that, however, 15 bearing in mind the approach which I have made clear 16 that I intend to adopt to the facts, it should only be 17 in the clearest of cases that the submission of further 18 evidence should be contemplated. I ought to add that 19 although further evidence might be read into the Inquiry 20 record, I anticipate that the likelihood of 21 consequential oral hearings to be comparatively remote. 22 The second point to be made about the Rule 13 23 letters is to underline that responses will only be of 24 value if they address the possible criticism. As 25 foreshadowed in my ruling, I will shortly be issuing Page 24</p>

6 (Pages 21 to 24)

<p>1 Rule 13 letters of a generic nature relating to the 2 culture, practises and ethics of the press referring 3 either to the press as a whole or to a part of or 4 section within the press. I appreciate that it will be 5 tempting for companies to respond by reference only to 6 their own practices; each, however, has read or heard 7 the evidence that has been put before the Inquiry and 8 I expect responses which address the wider issues about 9 the conclusions that I may reach generically. 10 A response that says no more than, "Not me", will be of 11 little, if any, value. Obviously, other letters may 12 address possible individual criticisms: they will 13 require an individual response. 14 Finally, I wish to say something about the 15 confidentiality of these letters. Rule 14 makes it 16 clear that the contents of a warning letter are to be 17 treated as subject to an obligation of confidence owed 18 by each member of the Inquiry Team to the recipient and 19 by both the recipient and the recipient's recognised 20 legal representative to me. The purpose is not to keep 21 the workings of the Inquiry secret: indeed, in relation 22 to the recipients of any letter, the duty of confidence 23 lapses when the Inquiry report is published. Rather, it 24 is to recognise that which is set out in paragraph 10 25 above, namely that the criticisms outlined in the letter</p> <p style="text-align: center;">Page 25</p>	<p>1 in different ways. The Inquiry has clearly attracted 2 considerable public interest which itself has generated 3 additional lines of inquiry beyond those initially 4 identified. In addition, the Inquiry has been subject 5 to a great deal of commentary. I have previously 6 directed that the press cuttings in relation to the 7 Inquiry will form part of its record. Without 8 necessarily dealing with any explicitly, I will consider 9 reports that in my view either support or undermine 10 concerns that have been expressed in evidence; I will 11 equally consider the validity of the comments that are 12 critical of the direction or approach of the Inquiry. 13 I add only that the collection of cuttings will continue 14 until the Inquiry reports. 15 Right. We were to start with Mr Sherborne, but 16 I understand that he's suffered a family bereavement and 17 in those circumstances we'll take a slightly different 18 order. Do the core participants, Mr Jay, understand the 19 order in which they are to speak and does it cause them 20 any embarrassment? 21 MR JAY: I haven't checked with all of them. 22 LORD JUSTICE LEVESON: I'll rise for a few minutes for you 23 to do that. 24 (10.45 am) 25 (A short break)</p> <p style="text-align: center;">Page 27</p>
<p>1 do not represent my concluded view. Thus to publish 2 them as my view or as "emerging thoughts" (as some of 3 the challenges which have I asked about during the 4 hearings have been reported) would be to misunderstand 5 the purpose of the exercise and misrepresent the 6 position of the Inquiry. I hope that the duty of 7 confidence will be observed by all. I will, however, 8 wait to see. 9 Further developments. 10 In the ten months during which the Inquiry has 11 received briefings, held seminars and been taking 12 evidence, much has happened which is relevant to 13 conclusions that may be reached as to the culture, 14 practices and ethics of the press, and as to many 15 aspects of the terms of reference. Events have 16 transpired which have been reported and reports have 17 given rise to complaint: a good example can be found in 18 the evidence of Giles Crown dealing with the tragic 19 death of an 11-year-old boy. In the same way that 20 I wish to be kept informed about the progress of the 21 police investigations encompassed by Operations Weeting, 22 Elveden and Tuleta, so if there are further incidents 23 that cause concern about the press that I can consider 24 before issuing my report, I shall do so. 25 Concerns have come to the attention of the Inquiry</p> <p style="text-align: center;">Page 26</p>	<p>1 (10.35 am) 2 LORD JUSTICE LEVESON: Mr Jay, I gather that arrangements 3 have been made for those core participants who were due 4 to speak this afternoon for representatives from their 5 clients to attend. I don't want to disrupt those 6 arrangements, so I'll hear Mr Garnham, who was due to 7 speak this morning, and then we'll have an early break 8 and resume this afternoon. 9 MR JAY: Yes. 10 LORD JUSTICE LEVESON: Right. Yes, Mr Garnham. 11 Closing submissions by MR GARNHAM 12 MR GARNHAM: Sir, at the beginning of this Inquiry, the MPS 13 emphasised that it came here to assist not obstruct, to 14 self-criticise and not to justify, and to try and 15 improve rather than to hide. The MPS has done 16 everything it can to be open and transparent, willing to 17 acknowledge mistakes and learn from the errors which the 18 Inquiry exposes. 19 In our written closing submissions for Module 2 of 20 11 May 2012 and our closing submissions for Module 3 of 21 17 July, the MPS attempted to summarise the evidence 22 heard by you and the Inquiry insofar as it was relevant 23 to the MPS or the relationships between the MPS and the 24 press. 25 We frankly admit that there have been incidents</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 which have led to a plain perception of cosiness between 2 particular senior MPS officers and particular 3 journalists. The MPS also acknowledge that the 4 decisions in July 2009 and September 2010 not to reopen 5 the phone hacking investigation were taken too quickly 6 and with a defensive and closed mindset.</p> <p>7 However, the MPS also submits that it's clear from 8 the evidence you've heard that the vast majority of 9 contact between the police and the media has been and 10 continues to be sensible, constructive and proper. 11 There has been nothing to suggest corruption on anything 12 other than the rarest of occasions, and those rare 13 occasions have been the subject of proper investigation 14 and proper sanction.</p> <p>15 The evidence received by the Inquiry unequivocally 16 demonstrates, we submit, that there was no relationship 17 between senior officers and journalists that was in fact 18 corrupt. There was no cosiness or inappropriately close 19 relationships that in fact tainted police 20 decision-making. More specifically, we say, the 21 evidence has demonstrated that the phone hacking 22 investigation was not at any stage limited because of 23 pressure from or fear of the media, whether 24 News International or the press more broadly. 25 Similarly, we submit, the evidence has demonstrated</p> <p style="text-align: center;">Page 29</p>	<p>1 At paragraph 2 of their submissions, the CPVs say 2 that: 3 "Perception is as important as reality." 4 With respect, that cannot be correct. A perception 5 that senior officers are too close to journalists is 6 indeed a source for concern. The MPS well recognises 7 the damage that such a perception has caused and 8 acknowledges the importance of ensuring that it doesn't 9 arise in the future. However, had the Inquiry uncovered 10 evidence of actual corruption of senior police officers 11 or of inappropriate relationships with journalists 12 actually causing different operational decisions to be 13 made, it would, we submit, rightly be even more 14 concerned about this than about the perception that some 15 relationships were unduly close.</p> <p>16 Saying that, sir, is not to downplay the importance 17 of perception. It simply recognises the obvious truth 18 that actual corruption or relationships which actually 19 affect police decision-making would be worse. To say 20 that the perception of corruption and real corruption 21 are equally important is simply not valid.</p> <p>22 The CPVs say perception is so important because 23 perception that the police are corrupt can lead to 24 a loss of public confidence in the police and 25 a perception that the press can act with impunity, which</p> <p style="text-align: center;">Page 31</p>
<p>1 that the decisions in 2009 and 2010 not to reopen the 2 investigation were not in fact influenced by 3 relationships between senior officers and 4 News International.</p> <p>5 The MPS has addressed these points in detail in its 6 written submissions and I will not repeat those 7 submissions here. However, we are grateful for the 8 opportunity briefly to address orally some assertions 9 and criticisms made by other core participants in their 10 written submissions. In particular, sir, I want to deal 11 today with two issues, which we say are critical to any 12 proper analysis of the evidence.</p> <p>13 First, the danger of conflating the perception of 14 wrongdoing with its reality, and secondly, inaccuracy 15 concerning the current work of the MPS to implement 16 changes to its media relations, policy and practice.</p> <p>17 The written submissions of the core participant 18 victims in relation to Module 2 of 28 May cover much of 19 the same ground as our submissions. Like us, the CPVs 20 make a distinction between the perception that there 21 were corrupt or inappropriate relationships between the 22 police and the press and the reality of such 23 relationships. However, in our submission the CPVs have 24 at numerous points conflated or confused the two. That, 25 we submit, is both unhelpful and potentially dangerous.</p> <p style="text-align: center;">Page 30</p>	<p>1 can lead to a worsening behaviour by the press. We 2 agree. The same point has been made by many witnesses 3 to this Inquiry.</p> <p>4 However, asserting that there is widespread 5 corruption in the police and that inappropriate 6 relationships between police and press have compromised 7 police independence when the evidence doesn't 8 demonstrate that is unjust and simply serves to worsen 9 the perception. In short, it creates the very problem 10 that the CPVs are so keen to avoid.</p> <p>11 That, we submit with respect, is precisely what the 12 CPVs have done on a number of occasions in their 13 submissions.</p> <p>14 Having recognised the distinction between perception 15 and reality, and, we say, wrongly asserted that 16 perception is just as important, the CPVs then assert 17 that a number of senior police officers did in fact 18 become too close to reporters and failed as 19 a consequence of that closeness fully to investigate or 20 disclose evidence of media wrongdoing. In particular, 21 they assert that in 2006, 2009 and 2010 close 22 relationships with News International journalists and 23 editors actually affected police decisions.</p> <p>24 In doing so, the CPVs are eliding the perception of 25 police independence being compromised with the reality</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 of such compromise. That's clear from phrases such as</p> <p>2 "independence or at least the appearance of independence</p> <p>3 was compromised", paragraph 32 of the CPVs' submission.</p> <p>4 They have conflated the two and asserted that</p> <p>5 because there may have been occasions when it appeared</p> <p>6 that certain senior police officers' independence was</p> <p>7 affected, it was in fact affected. That plainly doesn't</p> <p>8 follow.</p> <p>9 LORD JUSTICE LEVESON: No, the question is whether it's an</p> <p>10 inference that can be drawn.</p> <p>11 MR GARNHAM: Absolutely. Sir, you anticipate precisely the</p> <p>12 next clause of the sentence, which is: and there is</p> <p>13 nothing to support so serious an inference.</p> <p>14 The CPVs are not the only core participants to have</p> <p>15 conflated perception with reality. Guardian News and</p> <p>16 Media Limited have done the same in their Module 2</p> <p>17 submissions. They assert at paragraph 10(1) that there</p> <p>18 was "cosiness between senior MPS officers and</p> <p>19 News International executives". At paragraph 12 they</p> <p>20 state that there is "real force in the view that an</p> <p>21 excessive close relationship developed between NI</p> <p>22 executives and senior police officers such as to</p> <p>23 materially influence the MPS response to the phone</p> <p>24 hacking investigation".</p> <p>25 But the evidence they point to, primarily the Filkin</p> <p style="text-align: center;">Page 33</p>	<p>1 this dinner, DCS Phil Williams had sought and been given</p> <p>2 additional resources for Operation Caryatid. On</p> <p>3 26 April, the day after the dinner, the decision was</p> <p>4 made to proceed with the investigation.</p> <p>5 Those actions are suggestive, we submit, of</p> <p>6 a robust, independent police force, not one whose</p> <p>7 independence was compromised.</p> <p>8 LORD JUSTICE LEVESON: But could it ever have been sensible</p> <p>9 for the police -- for particularly a very, very senior</p> <p>10 ranking officer -- to have dinner with an organisation</p> <p>11 that one of his officers was then investigating?</p> <p>12 MR GARNHAM: That, with respect, is a separate question. It</p> <p>13 may well be, sir -- I'm going to make no concession --</p> <p>14 you will decide that it was not. But that is not -- and</p> <p>15 this is the critical point -- evidence of corruption in</p> <p>16 fact.</p> <p>17 LORD JUSTICE LEVESON: No, I understand the point that</p> <p>18 you're making, but the trouble is that this is where</p> <p>19 perception does become extremely important. If, as was</p> <p>20 the event, that investigation was limited, no doubt for</p> <p>21 different reasons, it doesn't require a very suspicious</p> <p>22 mind to join the dots together.</p> <p>23 MR GARNHAM: I absolutely agree and concede that, sir. Of</p> <p>24 course that's right. And the which of such a dinner</p> <p>25 happening at such a time is plainly something which can</p> <p style="text-align: center;">Page 35</p>
<p>1 report, is about a perception of inappropriate</p> <p>2 relationships, not actual compromise of independence,</p> <p>3 and that flawed analysis, we submit, needs to be</p> <p>4 exposed.</p> <p>5 I'm going to concentrate for the main part in these</p> <p>6 short oral submissions on the core participant victims'</p> <p>7 submissions, as they're the most extensive, but the</p> <p>8 points could equally be made towards the Guardian's</p> <p>9 submissions.</p> <p>10 There are several points in the CPVs' submissions</p> <p>11 where the evidence referred to may justifiably be said</p> <p>12 to demonstrate a perception or appearance of unduly</p> <p>13 close relationships, but cannot be said to show that</p> <p>14 there was compromise of police independence in reality,</p> <p>15 yet the CPVs do assert such actual compromise.</p> <p>16 I deal with it by just three examples. At</p> <p>17 paragraph 48, the CPVs refer to a dinner hosted by the</p> <p>18 News of the World, which Andy Hayman and Dick Fedorcio</p> <p>19 attended on 25 April 2006. They note that this was at</p> <p>20 a crucial time in Operation Caryatid and assert that</p> <p>21 "the possibility of inappropriate conversation cannot be</p> <p>22 excluded".</p> <p>23 But in fact the timings suggest that such</p> <p>24 hospitality could have had no effect whatsoever on</p> <p>25 operational decisions. On 18 April, a few days before</p> <p style="text-align: center;">Page 34</p>	<p>1 be the subject of comment. But it's a huge jump to say</p> <p>2 that you can proceed from that to a conclusion that in</p> <p>3 fact at that dinner they got around the table and said,</p> <p>4 "Tell you what, we'll just go through the motions". And</p> <p>5 that is, in our submission, at the root of the error of</p> <p>6 the analysis that's been put forward by some.</p> <p>7 The CPVs severely criticise DCS Williams for failing</p> <p>8 to widen the scope of Caryatid in 2006. They conclude</p> <p>9 at paragraph 82 that there remains in relation to DCS</p> <p>10 Williams a strong inference that he was fearful of the</p> <p>11 influence of the powerful media friends of his</p> <p>12 superiors. There is simply not the evidence to support</p> <p>13 such an inference. I will deal with these criticisms at</p> <p>14 little length because they're more extensive and haven't</p> <p>15 been specifically covered in our written submissions.</p> <p>16 In our submission, the Inquiry has heard compelling</p> <p>17 evidence from all the officers involved in the</p> <p>18 investigation about the overwhelming pressure on the MPS</p> <p>19 from the terrorist threat in 2006 and the absolute</p> <p>20 priority that had to be given to counter-terrorist</p> <p>21 operations. As Peter Clarke said in a memorable phrase:</p> <p>22 "Invasions of privacy are odious. They can be</p> <p>23 extraordinarily distressing and at times they can be</p> <p>24 illegal, but to put it bluntly: they don't kill you."</p> <p>25 The CPVs, in their analysis, skip lightly over this</p> <p style="text-align: center;">Page 36</p>

9 (Pages 33 to 36)

<p>1 crucially important factor in a single sentence at 2 paragraph 75. They say: 3 "Be that as it may, it doesn't explain the 4 reluctance of DC Williams to reveal the full extent and 5 nature of the evidence to the CPS or pursue the agreed 6 strategy of informing victims." 7 We submit that that is wildly to underappreciate the 8 nature and significance of the evidence about terrorist 9 threats. 10 There's no need to drive that point home, I suspect, 11 sir. We deal with it in our written submissions and I'm 12 not going to labour it. 13 The Inquiry has heard no evidence that DCS Williams 14 himself had any relationship with the media which could 15 conceivably be perceived as overly close, let alone 16 actually corrupt. Moreover, as the CPVs acknowledge, 17 there is no evidence that he made any conscious decision 18 to suppress evidence. Nonetheless, the CPVs feel able 19 to assert, paragraph 76, that he would no doubt have 20 been aware that his superiors in the MPS hierarchy 21 enjoyed extremely close relationships with those he was 22 investigating and therefore that it was: 23 "Inevitable that the relationships between very 24 senior MPS officers and the media exerted some influence 25 on his decision-making." Page 37</p>	<p>1 because of counts 15 to 20. The CPS knew about the 2 corner names. They had a copy of the Blue Book. 3 Second, DCS Williams was working on the 4 understanding that the evidential requirement to prove 5 unlawful interception of voicemail was that it had to 6 take place before it was accessed by the intended 7 recipient. 8 Now, sir, you may decide he was wrong about that. 9 You may conclude that he was taking too narrow a view of 10 the legal requirements to make out his case. But there 11 is nothing to support a case that DCS Williams was there 12 actively or intentionally misleading anyone. 13 LORD JUSTICE LEVESON: It's not just a question of my 14 construction of the statute, is it? Because at the time 15 charges were pursued on the basis of the wider view, and 16 in any event, he, like any experienced detective, would 17 well have understood the reach of the law of conspiracy. 18 MR GARNHAM: Absolutely, absolutely. But he was guided in 19 the decisions he made -- and it may be he got it wrong. 20 But he was guided by the advice he'd received. And it 21 is an enormous jump, and one which we would suggest the 22 Inquiry would not be justified in taking, between saying 23 he got it wrong on these points and saying, as the core 24 participant victims do, that he was misleading in some 25 active sense anybody, whether counsel or CPS or his Page 39</p>
<p>1 With respect, that's nonsense. 2 First, there's no evidence to suggest that DCS 3 Williams had any knowledge at all about the 4 relationships between other officers and particular 5 journalists at particular newspapers, and that point was 6 never put to him. 7 Second, that assertion assumes what it seeks to 8 prove, that DCS Williams was making not just incorrect 9 decisions, but decisions motivated by improper 10 considerations. 11 And third, it ignores the fact that DCS Williams's 12 superior was Peter Clarke, an officer whom, as the 13 Inquiry has repeatedly heard, is held in the highest 14 regard by everyone who's ever worked with him. Even the 15 CPVs accept that Mr Clarke did not accept much 16 hospitality at all, and what he did accept was 17 even-handed as to his relationship with the media. 18 The CPVs make their inference about DCS Williams on 19 the basis that he knew there was evidence of journalists 20 other than Clive Goodman being involved but "misled" the 21 CPS prosecuting counsel and AC Clarke by saying there 22 was no such evidence. We've addressed that in our 23 submissions and I just make three short points. 24 First, CPS and counsel were plainly aware that the 25 evidence implicated journalists other than Goodman Page 38</p>	<p>1 superiors. We say the evidence simply doesn't support 2 such a conclusion. 3 It is also, in our submission, significant that it 4 became clear from DCS Williams's evidence that he was 5 applying a restrictive view of what constituted 6 evidence. He appears to have believed that he had to 7 obtain concrete, forensically irresistible proof. His 8 whole approach, it emerged, was that it wouldn't be 9 sufficient to rely on inference, however powerful 10 a lawyer might think the inference to be drawn was. 11 He might be wrong about that, but the idea that he 12 was actively misleading anyone is, in our submission, 13 farfetched. 14 The CPVs also base their inference about DCS 15 Williams on the assumption that the MPS was in 16 possession of all the evidence in 2006 necessary to 17 realise that phone hacking was as extensive as it's 18 turned out to be seen to be. But that, in our 19 submission, is to fall into the obvious trap of viewing 20 this through the wrong end of the telescope. It wholly 21 fails to take into account the hugely time-consuming and 22 resource-intensive nature of the work that would have 23 been needed to be carried out in order properly to 24 investigate these affairs. 25 It is, in our submission, sufficient to look at the Page 40</p>

10 (Pages 37 to 40)

<p>1 extent and nature of Operation Weeting to see the 2 quantity of work involved. DAC Akers reminded the 3 Inquiry this morning about the volume of material 4 involved in some of these operations.</p> <p>5 The CPVs point to a failure to seek a production 6 order against News International as a further reason to 7 draw inferences against DCS Williams. We've made 8 separate submissions on this issue in relation to 9 Module 4. You have written evidence from the Deputy 10 Commissioner on that topic, and we would respectfully 11 refer you to that in this context.</p> <p>12 LORD JUSTICE LEVESON: Yes. What he's saying is that 13 actually it becomes almost impossible because merely to 14 assert, "We'll co-operate", makes it extremely difficult 15 to satisfy the engagement criteria for a production 16 order.</p> <p>17 MR GARNHAM: Yes.</p> <p>18 LORD JUSTICE LEVESON: Because you can't prove that they 19 haven't co-operated. So the co-operation might be 20 a fig-leaf for doing not very much, and there's nothing 21 very much the police can do about it.</p> <p>22 MR GARNHAM: It's seen as a self-justifying, self-fulfilling 23 assertion when police are met with that sort of 24 response.</p> <p>25 LORD JUSTICE LEVESON: But on the other hand, of course, one Page 41</p>	<p>1 strategy for informing potential victims as evidence 2 from which inferences can be drawn against DCS Williams 3 that his independence was compromised. Again, we say 4 the scattergun nature of the CPVs' analysis is evident.</p> <p>5 The MPS has acknowledged that the victim strategy 6 was not properly implemented. It's done so both in its 7 submission to this Inquiry and in the judicial review 8 proceedings, but the reasons for that were various: lack 9 of resources, competing demands, failure to follow-up 10 a process that was believed to be working properly.</p> <p>11 But there's no evidence that you've heard at any 12 stage to suggest that it was fear of News International, 13 whether on the part of DCS Williams or anyone else in 14 the investigation team, which caused the failure of the 15 victim strategy.</p> <p>16 We say that for the CPVs to assert to that effect is 17 another example of conflating perception and reality.</p> <p>18 CPVs summarise their allegations at paragraph 108. 19 They say that the failures in the investigation are so 20 significant that an inference can be drawn that police 21 officers deliberately sought to downplay the evidence 22 out of fear of News International.</p> <p>23 Hindsight is a dangerous device in an Inquiry of 24 this sort. Nowhere, we say, is it capable of greater 25 mischief than here. No one concerned with this Inquiry Page 43</p>
<p>1 has to be very careful to respect journalistic sources, 2 for all the reasons that we've discussed during the 3 course of the Inquiry.</p> <p>4 MR GARNHAM: Absolutely. And that's the nature of the 5 problem that we have sought to address in Deputy 6 Commissioner Mackey's submission.</p> <p>7 LORD JUSTICE LEVESON: Yes.</p> <p>8 MR GARNHAM: But it suffices for present purposes to observe 9 that the Operation Caryatid team found 10 News International's lack of co-operation back in 2006 11 frustrating in the extreme. You'll remember in answer 12 to a question from you this morning, sir, DAC Akers drew 13 a sharp distinction between that level of co-operation 14 and what she has received in more recent months.</p> <p>15 The criticism faced by the police when journalists 16 are investigated or searched is apparent from Module 2, 17 written submissions from the NUJ, which I'll come back 18 to in a moment. But we say the CPVs' attack is 19 indiscriminating when it fails to recognise that 20 whatever criticisms might be made of the law relating to 21 production orders in cases involving newspapers, DCS 22 Williams and the rest of the Operation Caryatid team was 23 having to work with the law as it was then, not as it 24 might be at some future day.</p> <p>25 Finally, sir, the CPVs point to the failure of the Page 42</p>	<p>1 can wholly exclude from their minds knowledge of the 2 significance of the material which subsequent events 3 have demonstrated. The potential significance of first 4 names scribbled across the corner of a piece of paper is 5 now patent, but it's a long way from providing a ground 6 for criticising those who at the time regarded this not 7 as evidence of complicity in wrongdoing by journalists 8 but as no more than a potential lead, which with a great 9 deal of further work might lead to evidence, which might 10 justify the arrest of an as yet unidentified individual.</p> <p>11 Still less, we say, is it grounds for inferring that 12 operational decisions were made because of fear of 13 News International.</p> <p>14 LORD JUSTICE LEVESON: But the police certainly had got to 15 grips with the Mulcaire documentation, hadn't they?</p> <p>16 MR GARNHAM: Yes.</p> <p>17 LORD JUSTICE LEVESON: Because they sought to interview -- 18 I think it was Mr Mulcaire about these very topics, and 19 also identified other names and the material which 20 included PIN numbers and the like, which suggested, at 21 any rate, that this was very much more extensive than 22 that which eventually emerged as the prosecution case.</p> <p>23 MR GARNHAM: They had begun to get to grips with it, 24 I readily concede, and they had started to detect what 25 that evidence might suggest, yes. But it's a long way Page 44</p>

11 (Pages 41 to 44)



<p>1 from that to putting together a case that was sufficient 2 to be taken to court.</p> <p>3 LORD JUSTICE LEVESON: I understand that, but that's not the 4 charge specifically. The charge might just as easily 5 be, as I read the submission, that you never went 6 further. And another example that might be given of 7 that could be -- and I ask you to deal with it -- the 8 failure to deal with the much enunciated "rogue 9 journalist" theory, where certainly the police had the 10 very gravest concerns, it seems to me, that this wasn't 11 one rogue journalist, and yet -- I mean, normally, if 12 the police fear that there may be other criminal conduct 13 which they can't prove, I think the phrase is they "warn 14 people as to their conduct".</p> <p>15 MR GARNHAM: Yes.</p> <p>16 LORD JUSTICE LEVESON: Rather than caution them, because 17 they can only caution somebody who admits it. Because 18 it was nothing like that.</p> <p>19 MR GARNHAM: Two points in the observations you've made, 20 sir. As to the second, about the good sense of giving 21 such a warning, that was addressed by senior officers, 22 more recently-appointed senior officers, in answers to 23 questions from you, and they agreed.</p> <p>24 Mr Peter Clarke agreed that although it would be 25 difficult sometimes for him to go into the office of</p> <p style="text-align: center;">Page 45</p>	<p>1 that the evidence surrounding 2009 and 2010 could give 2 rise to a perception or suspicion of cosiness 3 influencing decision-making, but it's simply not valid, 4 I would submit, to assert that the MPS were involved in 5 a cover-up, intentionally or otherwise. Indeed, I'm not 6 entirely clear how one can unintentionally cover up 7 anything, since the verb "cover-up" in this context 8 necessarily involves some deliberate action.</p> <p>9 LORD JUSTICE LEVESON: I think I agree with that.</p> <p>10 MR GARNHAM: It's right to acknowledge that the decisions 11 were probably taken too quickly and with a defensive 12 mindset that may not have asked the right questions.</p> <p>13 That was conceded by Sir Paul Stephenson and by 14 others subsequent to him, and we respectfully urge you 15 to adopt that. But there is absolutely nothing by way 16 of hard evidence which calls into question the integrity 17 of John Yates when he made those decisions. There's 18 nothing to show that he was in fact swayed in his 19 decision-making by his friendship with Neil Wallis or 20 his relationships with News International more 21 generally. There's nothing to show that he deliberately 22 misled the Select Committee, the DPP or the victims, and 23 again we say that to confuse legitimate criticisms that 24 can be made about perception with reality is wholly 25 unwarranted.</p> <p style="text-align: center;">Page 47</p>
<p>1 a managing director of a large organisation and read the 2 riot act in the way you've suggested, there were 3 occasions when that would be sensible, and I don't 4 attempt to dissent from that.</p> <p>5 LORD JUSTICE LEVESON: I can't immediately see that an 6 officer as senior as Mr Clarke would have very much 7 difficulty in making his views very clear to whomsoever 8 he wished to make his views clear, however unhappy the 9 response he might receive.</p> <p>10 MR GARNHAM: I don't attempt to dissuade you from that view, 11 sir. That was put perfectly fairly to Mr Clarke and he 12 dealt with it. But what I do attempt to respond to is 13 the suggestion that there is in that some evidence which 14 founds an inference that DCS Williams was either 15 cowardly in his approach to police officers [sic] or was 16 positively corrupt. Those are huge jumps, which I say 17 are simply not justified on the evidence.</p> <p>18 The final example of CPVs conflating perception and 19 reality relates to the decisions in 2009 and 2010 not to 20 reopen the phone hacking investigation. Paragraph 109 21 of the CPVs' submissions read:</p> <p>22 "Intentionally or not, the MPS supported and 23 participated in a cover-up of the facts, which has led 24 to suspicions of corruption."</p> <p>25 Sir, in our submission it may be valid to consider</p> <p style="text-align: center;">Page 46</p>	<p>1 LORD JUSTICE LEVESON: Mr Yates certainly didn't do himself 2 any favours, did he?</p> <p>3 MR GARNHAM: And fortunately that's not the case I'm having 4 to make out, sir.</p> <p>5 LORD JUSTICE LEVESON: No.</p> <p>6 MR GARNHAM: We would urge you not to make the same mistake 7 as the CPVs and others.</p> <p>8 Some of the evidence heard over the course of the 9 last nine months could give rise to criticisms based on 10 perception, but the evidence goes nowhere near to 11 establishing that corruption or actual compromise of 12 police independence occurred. And to slide from 13 perception to fact is an easy move to make, but would 14 not be remotely justifiable on the evidence you've 15 heard.</p> <p>16 LORD JUSTICE LEVESON: What about this, Mr Garnham -- and it 17 may be that it doesn't take any matters any further, and 18 I'm not saying that I've reached this conclusion, I say 19 immediately. But in connection with the decision in 20 2009, could it be said certainly approached too 21 defensively, but also approached on the basis that very 22 senior officers knew and understood the leaders of this 23 organisation, and because of their personal knowledge of 24 them were therefore less prepared to think ill of what 25 they had been doing?</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 MR GARNHAM: Sir, that's somewhere between the two</p> <p>2 stances --</p> <p>3 LORD JUSTICE LEVESON: That's why I asked you about it.</p> <p>4 MR GARNHAM: -- I've identified.</p> <p>5 I understand that, sir. I would submit that even</p> <p>6 that would be going too far. You don't have the</p> <p>7 evidence even for that. But that is some way short of</p> <p>8 actual corruption or actual compromise of independence;</p> <p>9 and I say you can't go even that far on what you've</p> <p>10 heard, but plainly it is a gradation.</p> <p>11 It's instructive, we say, to observe that the very</p> <p>12 same factual context can be perceived from very</p> <p>13 different standpoints, depending on the observer.</p> <p>14 That's apparent from the NUJ's submissions on Module 2,</p> <p>15 which criticise the MPS for being "interfering" and</p> <p>16 "threatening" in its media relationship. And it does so</p> <p>17 over precisely the same period of time during which it's</p> <p>18 accused of being over-cosy by the CPVs.</p> <p>19 We submit we're trapped somewhat between a rock and</p> <p>20 a hard place in trying to get this right. On the one</p> <p>21 hand, we can be criticised by the NUJ for being</p> <p>22 draconian. On the other, we can be criticised for being</p> <p>23 overfriendly.</p> <p>24 That serves, we submit, to illustrate the difficult</p> <p>25 position the police are in when it comes to dealing with</p> <p style="text-align: center;">Page 49</p>	<p>1 some legitimate grounds for criticism of MPS conduct,</p> <p>2 primarily regarding the public perception created by the</p> <p>3 actions of some of its officers.</p> <p>4 We submit that the MPS has demonstrated through the</p> <p>5 evidence of its current senior officers an intent to</p> <p>6 address and correct the errors that this Inquiry has</p> <p>7 exposed. We remain ready to listen to and learn from</p> <p>8 your conclusions, and we do so whether or not they</p> <p>9 happen to coincide with our own analysis.</p> <p>10 LORD JUSTICE LEVESON: Mr Garnham, I'm very grateful for</p> <p>11 that, but could you help me with the present position of</p> <p>12 the ACPO responses, both to Sir Denis O'Connor's report</p> <p>13 and I think that also encompasses what Elizabeth Filkin</p> <p>14 had to say?</p> <p>15 MR GARNHAM: The honest answer to your question is: No,</p> <p>16 I don't think I can. I don't act for ACPO, but I have</p> <p>17 lines of communication to ACPO and I would have to take</p> <p>18 instructions and respond to that --</p> <p>19 LORD JUSTICE LEVESON: I wasn't necessarily asking from an</p> <p>20 ACPO perspective. Presumably your clients know where</p> <p>21 they've got to in relation to the ACPO line.</p> <p>22 MR GARNHAM: Yes.</p> <p>23 LORD JUSTICE LEVESON: I think it would be useful if you</p> <p>24 could just at some stage submit a very short note on it</p> <p>25 so that I know.</p> <p style="text-align: center;">Page 51</p>
<p>1 an investigation of the press, and in that circumstance</p> <p>2 it is, we would submit, remarkable that the Inquiry has</p> <p>3 heard such a substantial body of evidence that's been</p> <p>4 positive about the work of the MPS, about the</p> <p>5 relationship between the MPS and the press and about the</p> <p>6 work of the MPS and the press together.</p> <p>7 The second of my two issues, sir, you'll be glad to</p> <p>8 know, is much more straightforward and can be dealt with</p> <p>9 much more shortly.</p> <p>10 The Guardian has at paragraph 6 of their submissions</p> <p>11 suggested that the MPS has adopted the recommendations</p> <p>12 of the Filkin report, and they then go on to criticise</p> <p>13 some of those. It's simply not correct to say that the</p> <p>14 MPS has adopted the Filkin report's recommendations.</p> <p>15 As Commissioner Hogan-Howe explained, the MPS has</p> <p>16 accepted her findings and the broad thrust of her</p> <p>17 report, but needs to do more work on whether and how to</p> <p>18 implement the recommendations. The work is being done</p> <p>19 now and that's set out in our Module 2 submissions.</p> <p>20 There's an update on progress at annex 1 of our Module 3</p> <p>21 submissions.</p> <p>22 We submit that the overall picture that's emerged in</p> <p>23 the course of your Inquiry is that relations between the</p> <p>24 press and the police, whilst not perfect, have been</p> <p>25 essentially sound. We recognise that there has been</p> <p style="text-align: center;">Page 50</p>	<p>1 MR GARNHAM: I will do so, sir.</p> <p>2 LORD JUSTICE LEVESON: Thank you very much indeed. Thank</p> <p>3 you.</p> <p>4 Right. It's not happened many times during the</p> <p>5 course of the last ten months, but in the light of the</p> <p>6 fact that we can't proceed further, we'll adjourn now</p> <p>7 until 2 o'clock.</p> <p>8 Thank you.</p> <p>9 (11.32 am)</p> <p>10 (The luncheon adjournment)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 52</p>

13 (Pages 49 to 52)

A			B			
able 15:25 19:3 19:25 37:18	advance 21:6 adverse 10:10 20:20	46:15 approached 48:20,21	back 42:10,17 background 4:4	cause 16:19 26:23 27:19	comment 36:1 commentary 27:5	conclusions 20:20 25:9
absence 19:14	adversely 10:24	approaches 21:1 21:12	ball 4:6,11 5:6 12:24	caused 3:4,11 5:2 31:7 43:14	comments 10:22 27:11	concrete 40:7
absolute 36:19	advice 2:9 4:17 13:2 39:20	appropriate 22:1 24:13	bailed 4:13,14 balance 20:22	causing 31:12	Commissioner 1:10,14 9:19	conduct 8:15
absolutely 12:16 16:8,13 33:11 35:23 39:18,18 42:4 47:15	advised 2:8	April 7:7 13:5 34:19,25 35:3	bank 7:4,4	caution 45:16,17	15:18 18:4 41:10 42:6	45:12,14 51:1
AC 38:21	affairs 40:24 affect 10:24 17:12 31:19	arguable 23:18 23:25	banking 11:19 base 40:14	certainly 44:14 45:9 48:1,20	50:15	conducted 5:17 9:25 11:5
accept 38:15,15 38:16	afternoon 28:4,8 ago 8:22	argue 20:19	based 18:5 48:9	challenge 14:20 21:20 23:2	commissioning 22:15	conducting 11:16 24:2
accepted 50:16	agree 12:12 32:2 35:23 47:9	arising 20:13	basis 3:6 9:24 10:22 17:3	challenged 21:8	committed 3:23 8:19	conduit 7:3
access 11:19	agreed 37:5 45:23,24	arrangements 28:2,6	23:17 38:19 39:15 48:21	challenges 4:2 11:1,2 26:3	Committee 2:16 3:23 47:22	conduits 5:20
accessed 39:6	Akers 1:5,7 15:19 18:4	arrest 10:6,9 12:24 44:10	bear 1:11	change 2:22 4:25 10:13,23 16:1	communication 51:17	confidence 25:17 25:22 26:7
account 7:4,4 8:3 22:19 40:21	20:11 41:2 42:12	arrested 4:6,9	bearing 24:15	changes 30:16	communications 4:10	31:24
accounted 49:18	akin 9:13	arrests 5:17 8:23 9:18 10:5,25 12:21	Beer 24:13	charge 20:11 45:4,4	companies 9:4 25:5	confidentiality 25:15
acknowledge 28:17 29:3 37:16 47:10	albeit 22:7	asked 9:5,9,23 10:14 26:3	began 2:24	charges 4:18 39:15	company 2:14	conflated 30:24 33:4,15
acknowledged 43:5	alert 23:20	47:12 49:3	beginning 1:12 2:23 28:12	circumstance 50:1	comparatively 24:21	conflating 30:13 43:17 46:18
acknowledges 31:8	allegation 6:14	asking 51:19	behaviour 32:1	circumstances 18:12 23:15 27:17	compelling 36:16	confuse 47:23
ACPO 51:12,16 51:17,20,21	allegations 11:17 11:18 12:2 21:22 22:1	aspect 8:11	believed 40:6 43:10	checked 27:21	competing 43:9	confused 30:24
acquired 19:13	43:18	aspects 23:7 26:15	beyond 27:3	circumstance 50:1	complaint 26:17	connection 22:15 48:19
act 1:22 6:4,5,6 12:22 18:14,14 20:24 21:2	alleged 5:5 6:11 8:15	assert 32:16,21 33:17 34:15,20 37:19 41:14	Blue 39:2	clean 15:25	completed 15:5	conscious 10:18 22:11 37:17
22:17 31:25 46:2 51:16	allow 24:13	43:16 47:4	bluntly 36:24	clear 1:19 5:5 15:17 18:3,13	completion 12:24	consequence 32:19
acted 5:20 7:3 21:9	amount 8:5 11:3 12:4,6,13	asserted 32:15 33:4	body 50:3	clear 1:19 5:5 15:17 18:3,13	complicity 44:7	consequences 21:19
acting 3:15	amounts 12:10	asserting 32:4	Book 39:2	clients 18:23 19:10 28:5 51:20	compromise 33:1 34:2,14 34:15 48:11 49:8	consequential 24:21
action 10:11 47:8	analysis 12:15 30:12 34:3	assertion 38:7 41:23	boy 26:19	clarity 27:1	computer 11:19 12:22	consider 19:17 22:21 23:10,24 24:11 26:23
actions 35:5 51:3	36:6,25 43:4 51:9	assertions 30:8	breach 21:3,9	clerk 24:17	concede 35:23 44:24	27:8,11 46:25
active 39:25	Andy 34:18	assessment 8:13 8:18 11:17,21	breaches 20:23	clearly 27:1	compromised 32:6,25 33:3 35:7 43:3	considerable 10:10 27:2
actively 39:12 40:12	and/or 12:22	assessments 8:9	break 27:25 28:7	clients 18:23 19:10 28:5 51:20	computer 11:19 12:22	considerations 38:10
actual 31:10,18 34:2,15 48:11 49:8,8	annex 50:20	assist 3:24 14:23 15:24 28:13	breaking 13:14	close 29:18 31:5 31:15 32:18,21 33:21 34:13 37:15,21	conceded 21:1 47:13	considered 23:17
add 5:11 24:18 27:13	answer 21:25 42:11 51:15	Assistant 1:10,14 9:19 15:18 18:3	Bribery 6:4,5	Clive 38:20	conceding 21:1 47:13	conspiracy 4:9 39:17
addition 19:18 27:4	answering 12:6	Associated 19:19 20:15 21:10	briefings 26:11	close 29:18 31:5 31:15 32:18,21 33:21 34:13 37:15,21	conceivably 37:15	constitute 24:3
additional 27:3 35:2	answers 45:22	assumes 38:7	briefly 30:8	closed 29:6	concentrate 34:5	constituted 40:5
address 19:9 24:24 25:8,12 30:8 42:5 51:6	anticipate 20:7,8 24:20 33:11	assumption 40:15	broad 50:16	closely 2:7	concern 26:23 31:6	construction 39:14
addressed 17:16 30:5 38:22 45:21	apparent 14:22 42:16 49:14	attack 42:18	broadly 29:24	closeness 32:19	concerned 16:9 16:10 19:5 20:18 22:11 31:14 43:25	constructive 29:10
adjourn 52:6	appear 13:11 23:25	attempt 46:4,10 46:12	Broken 5:17	closing 21:18 28:11,19,20	code 13:15,15	contact 2:24 15:14 29:9
adjournment 52:10	appearance 33:2 34:12	attempted 28:21	Burton 2:25	collated 11:22 18:24	coincide 51:9	contemplated 24:18
admit 28:25	appeared 33:5	attempting 9:22		collate 11:22 18:24	collected 11:22 18:24	contents 13:15 25:16
admits 45:17	appears 3:11 13:12 40:6	attended 34:19		come 13:11 15:25 16:6 22:7 26:25 42:17	conclude 15:22 20:22 36:8 39:9	context 41:11 47:7 49:12
adopt 24:16 47:15	applying 40:5	attention 26:25		commence 49:25	concluded 26:1	continue 2:1 27:13
adopted 50:11 50:14	appreciate 23:22 25:4	attitude 20:15		commencing 17:20	conclusion 36:2 40:2 48:18	continued 3:21
adopts 21:11	approach 15:24 16:2 22:24 23:3 24:15 27:12 40:8	attracted 27:1 August 4:13 22:7 autumn 16:15				continues 11:2 29:10
		avoid 32:10				continuing 3:25 5:23,25 12:21
		aware 37:20 38:24				continuous

18:25 contradict 12:2 contradicting 21:6 control 9:7 conversation 34:21 Copeland 2:25 copy 39:2 core 17:1 18:16 19:3,25 20:18 21:5,24 27:18 28:3 30:9,17 33:14 34:6 39:23 corner 39:2 44:4 corporate 2:10 15:24 correct 2:4,19 11:1 31:4 50:13 51:6 corrupt 5:20 29:18 30:21 31:23 37:16 46:16 corruption 6:3,6 29:11 31:10,18 31:20,20 32:5 35:15 46:24 48:11 49:8 cosiness 29:1,18 33:18 47:2 counsel 38:21,24 39:25 counter-terror... 36:20 country 13:21 counts 39:1 couple 10:5 course 2:1 4:19 6:1,5 10:19 13:1 16:9 19:17 22:18,20 23:19 35:24 41:25 42:3 48:8 50:23 52:5 court 45:2 cover 30:18 47:6 covered 5:8 36:15 cover-up 46:23 47:5,7 cowardly 46:15 co-operate 41:14 co-operated 9:14 41:19 co-operation 2:13 3:2,7,25 7:13 9:4,23,25 10:14,23,23 11:2 14:15,17 41:19 42:10,13 CPS 2:7 4:17 5:21,23,25 8:13 13:1 37:5	38:21,24 39:1 39:25 CPVs 30:19,23 31:1,22 32:10 32:12,16,24 33:3,14 34:10 34:15,17 36:7 36:25 37:16,18 38:15,18 40:14 41:5 42:18,25 43:4,16,18 46:18,21 48:7 49:18 created 51:2 creates 12:14 32:9 criminal 6:2 8:15 18:6 45:12 criminality 10:4 criteria 12:18 41:15 critical 23:22 27:12 30:11 35:15 criticise 36:7 49:15 50:12 criticised 49:21 49:22 criticising 44:6 criticism 23:11 23:12 24:5,24 42:15 51:1 criticisms 23:16 23:24 24:7 25:12,25 30:9 36:13 42:20 47:23 48:9 Crown 26:18 crucial 34:20 crucially 37:1 culture 16:1,12 18:11 25:2 26:13 current 4:8 5:18 5:19 30:15 51:5 currently 4:17 5:21 cuttings 27:6,13	day 19:1 35:3 42:24 days 10:6,9 22:25 34:25 DC 37:4 DCS 35:1 36:9 37:13 38:2,8 38:11,18 39:3 39:11 40:4,14 41:7 42:21 43:2,13 46:14 deadline 19:24 deal 6:21 14:19 17:22 18:18 19:25 24:7 27:5 30:10 34:16 36:13 37:11 44:9 45:7,8 dealing 22:19,23 23:1 26:18 27:8 49:25 dealings 2:15 deals 14:18 dealt 7:21 46:12 50:8 death 26:19 decide 35:14 39:8 decided 3:5 decision 35:3 37:17 48:19 decisions 10:24 22:14 29:4 30:1 31:12 32:23 34:25 38:9,9 39:19 44:12 46:19 47:10,17 decision-making 29:20 31:19 37:25 47:3,19 defensive 29:6 47:11 defensively 48:21 degree 10:15 delay 19:2 delayed 17:2 deliberate 47:8 deliberately 43:21 47:21 demands 43:9 demonstrate 32:8 34:12 demonstrated 29:21,25 44:3 51:4 demonstrates 29:16 Denis 51:12 depending 49:13 deputy 1:10,14 9:19 15:18 18:3 41:9 42:5 derive 16:11	descending 18:7 describes 7:24 despite 11:1 destruction 19:13 detail 6:22 18:8 30:5 detect 44:24 detective 20:17 39:16 developed 33:21 development 3:3 3:10 developments 6:10,14 18:1 26:9 device 43:23 devices 11:23 12:1 Dick 34:18 difference 17:17 different 8:1 9:12 13:20 27:1,17 31:12 35:21 49:13 difficult 41:14 45:25 49:24 difficulty 46:7 dinner 34:17 35:1,3,10,24 36:3 directed 27:6 direction 27:12 director 46:1 disagree 16:3 disclose 3:25 32:20 disclosed 11:9 disclosure 3:13 3:16,19,21 discovered 13:25 discrepancy 15:15 discrete 11:16 discussed 42:2 disrupt 28:5 disrupting 23:4 dissent 46:4 dissuade 46:10 distinction 30:20 32:14 42:13 distressing 36:23 documentation 3:25 10:4 11:22 12:4,13 12:17 13:12,24 20:16 44:15 doing 32:24 41:20 48:25 dots 35:22 doubt 35:20 37:19 downgrades 14:23 downloaded 12:7 13:9,16	downplay 31:16 43:21 DPP 47:22 draconian 49:22 drafting 9:15 draw 15:25 41:7 drawn 33:10 40:10 43:2,20 drew 42:12 drive 37:10 DSC 36:7 due 4:11 13:1 28:3,6 duty 25:22 26:6	31:21 34:8 error 12:12 36:5 errors 28:17 51:6 essentially 50:25 establish 14:4 established 6:15 6:19 19:1 20:24 establishing 48:11 ethical 22:14 ethics 16:12 18:11 25:2 26:14 event 19:15 35:20 39:16 events 26:15 44:2 eventually 44:22 even-handed 38:17 Everest 12:10 evidence 1:9 6:13 11:6 12:1 15:1,3,19 18:18 19:14,21 19:25 20:7,16 21:2,17,22,25 22:3,8,11,18 23:18 24:11,18 24:19 25:7 26:12,18 27:10 28:21 29:8,15 29:21,25 30:12 31:10 32:7,20 33:25 34:11 35:15 36:12,17 37:5,8,13,17 37:18 38:2,19 38:22,25 40:1 40:4,6,16 41:9 43:1,11,21 44:7,9,25 46:13,17 47:1 47:16 48:8,10 48:14 49:7 50:3 51:5 evidenced 10:4 evident 43:4 evidential 9:1,6 39:4 exactly 14:17 examined 13:14 example 22:9 26:17 43:17 45:6 46:18 examples 22:4 34:16 excess 8:5 excessive 33:21 exclude 44:1 excluded 18:10 34:22 executives 33:19 33:22	exercise 16:6 19:5,18 26:5 exerted 37:24 exist 13:20 existence 22:10 expect 25:8 experienced 39:16 expert 14:3 experts 13:16,18 explain 2:12,16 3:9 4:3 8:10 9:2,20,22 13:5 37:3 explained 50:15 explicit 23:12 explicitly 27:8 exposed 34:4 51:7 exposes 28:18 Express 7:6,11 8:24 9:8,11 expressed 27:10 extended 5:7 extensive 34:7 36:14 40:17 44:21 extent 17:11 18:9 37:4 41:1 extraordinarily 36:23 extreme 42:11 extremely 35:19 37:21 41:14
						F
						faced 42:15 facie 21:2,4,8 facilitate 3:2 facilitated 7:3 8:2 fact 6:15 7:9 14:4 21:7 29:17,19 30:2 32:17 33:7 34:23 35:16 36:3 38:11 47:18 48:13 52:6 factor 37:1 facts 23:18 24:16 46:23 factual 49:12 failed 32:18 failing 36:7 fails 40:21 42:19 failure 41:5 42:25 43:9,14 45:8 failures 43:19 fair 19:24 fairly 2:23 24:3 46:11 fairness 22:2 fall 40:19 familiar 6:1

family 27:16 far 15:6 16:14 49:6,9 farfetched 40:13 fast-moving 16:17 21:19 favours 48:2 fear 29:23 43:12 43:22 44:12 45:12 fearful 36:10 February 7:11 8:4 10:8 Fedorcio 34:18 feel 37:18 figure 15:12 figures 15:15 fig-leaf 41:20 files 4:16 5:21,23 13:1 Filkin 33:25 50:12,14 51:13 final 24:1 46:18 Finally 25:14 42:25 findings 50:16 first 1:4,25 11:13 17:5 18:21 21:1,7 23:9 30:13 38:2,24 44:3 five 5:20 flawed 34:3 flows 20:14 follow 33:8 following 1:21 3:3 8:23 10:9 10:13 follow-up 43:9 force 33:20 35:6 forensically 40:7 foreshadowed 24:25 form 12:8 19:2 19:20 23:25 27:7 formal 3:6 11:10 20:9 former 4:8 5:18 5:19 7:2,5 formerly 10:16 forthcoming 10:17 21:17 fortunately 48:3 forward 5:13 11:12 14:25 36:6 found 13:9 26:17 42:9 found 46:14 four 5:18 frankly 28:25 friends 36:11 friendship 47:19 frustrating 42:11	full 9:25 10:22 23:20 37:4 fully 32:19 further 1:15 7:9 7:16 8:6 9:17 9:18 11:6 12:25 13:24 14:2 17:25 19:2 20:12 22:13,25 23:21 24:11,17,19 26:9,22 41:6 44:9 45:6 48:17 52:6 future 16:13 17:22 31:9 42:24	gravest 45:10 great 15:17 27:5 44:8 greater 43:24 Greenberg 2:21 3:1 grips 44:15,23 ground 30:19 44:5 grounds 8:17,19 44:11 51:1 Group 8:25 9:8,9 Guardian 33:15 50:10 Guardian's 34:8 guided 39:18,20	hope 14:4 16:19 26:6 hopeful 14:1 hopeless 12:5 hospitality 34:24 38:16 hosted 34:17 huge 36:1 46:16 hugely 40:21	33:6 34:2,14 35:7 43:3 48:12 49:8 independent 35:6 indicated 9:10 individual 2:10 4:13 10:5 19:16 25:12,13 44:10 individuals 4:16 4:21 5:20 12:3 16:9 individual's 7:2 8:2 Inevitable 37:23 inference 16:1 33:10,13 36:10 36:13 38:18 40:9,10,14 43:20 46:14 inferences 41:7 43:2 inferring 44:11 influence 33:23 36:11 37:24 influenced 30:2 influencing 47:3 inform 18:10 information 14:2 14:21 16:8 18:5,24 19:13 19:18,22 20:5 21:3 informed 26:20 informing 37:6 43:1 inherent 24:2 initial 10:24 initially 14:20 27:3 inquiries 1:22 11:22,24 18:14 24:14 inquiry 1:15 6:2 9:17 13:17 16:6 17:22,25 18:24 19:23 20:9,12 21:13 21:20,23,25 22:4,6,9 23:19 24:3,19 25:7 25:18,21,23 26:6,10,25 27:1,3,4,7,12 27:14 28:12,18 28:22 29:15 31:9 32:3 36:16 37:13 38:13 39:22 41:3 42:3 43:7 43:23,25 50:2 50:23 51:6 insofar 15:6 28:22 instructions	51:18 instructive 49:11 integrity 47:16 intend 23:6,15 24:16 intended 19:8 39:6 intent 51:5 intentionally 39:12 46:22 47:5 intercept 4:10 interception 39:5 interest 8:11,12 8:14,16,21 21:4 27:2 interests 22:2 interfering 49:15 internal 10:1 11:4 International 2:14 6:19 7:6 7:15 9:14 13:10 15:21,23 29:24 30:4 32:22 33:19 41:6 43:12,22 44:13 47:20 International's 42:10 interview 44:17 interviewed 4:9 introduced 3:1 intrusion 11:18 Invasions 36:22 investigate 32:19 40:24 investigated 42:16 investigating 2:6 2:11 7:24 35:11 37:22 investigation 3:4 3:10 6:10,17 7:16 8:6 9:24 12:25 14:12 18:6,9 29:5,13 29:22 30:2 33:24 35:4,20 36:18 43:14,19 46:20 50:1 investigations 2:6 3:24 11:16 21:15 26:21 invite 5:14 invited 17:21 involved 10:8 36:17 38:20 41:2,4 47:4 involves 47:8 involving 42:21 irresistible 40:7 isolated 14:5,10 issue 14:11 18:13 20:13 41:8	issued 1:21 issues 17:23 18:2 18:20 22:13 25:8 30:11 50:7 issuing 24:25 26:24
J						
January 8:4 10:7 Jay 1:3,4,8,14,25 13:3 15:17 16:25 17:5,9 17:14 27:18,21 28:2,9 John 47:17 join 35:22 interests 5:22 19:5,7 45:9,11 journalistic 10:19 42:1 journalists 4:8 5:18 19:9 20:25 21:2,9 29:3,17 31:5 31:11 32:22 38:5,19,25 42:15 44:7 judicial 23:3 43:7 July 1:1,16 4:12 4:15 8:22 9:5 20:14 28:21 29:4 jump 36:1 39:21 jumps 46:16 June 2:17 3:14 3:20,20 7:7,10 18:22 justice 1:3,6,9,19 1:24 4:19 12:14,20 15:19 16:4,22 17:4,6 17:10,19 27:22 28:2,10 33:9 35:8,17 39:13 41:12,18,25 42:7 44:14,17 45:3,16 46:5 47:9 48:1,5,16 49:3 51:10,19 51:23 52:2 justifiable 48:14 justifiably 34:11 justified 8:15 21:4 39:22 46:17 justify 10:15 28:14 44:10						
K						
keen 32:10 keep 25:20 kept 26:20 kill 36:24 kind 11:15 12:8						

kindly 1:14	21:10 29:22	49:16	33:18,23 36:18	notified 15:8	13:4 14:21	15:2,15
Klein 2:18	33:16 35:20	medical 11:19	37:20,24 40:15	notifying 15:4	18:21 20:13	part 19:20 20:9
knew 38:19 39:1	line 13:17 51:21	meeting 3:14	43:5 46:22	NUJ 42:17 49:21	21:15 34:20	21:14 22:3,12
48:22	lines 9:17 27:3	meetings 2:21	47:4 49:15	NUJ's 49:14	35:2 41:1 42:9	24:2 25:3 27:7
know 12:5 16:16	51:17	3:6	50:4,5,6,11,14	number 4:5	42:22	34:5 43:13
17:15 50:8	link 18:25	member 25:18	50:15 51:1,4	11:16 21:17	operational	participant 17:2
51:20,25	linked 7:19 8:8	memorable	MSC 3:4,11,15	22:4 32:12,17	31:12 34:25	19:3,25 20:18
knowledge 38:3	list 19:7	36:21	7:14 9:21,25	numbers 44:20	44:12	21:5 30:17
44:1 48:23	listen 51:7	merely 16:10	10:11,12,18	numerous 2:7	operations 2:1,2	34:6 39:24
	little 25:11 36:14	41:13	11:5,8 13:3,8	7:5 30:24	16:7 26:21	participants
<b>L</b>	Lloyd 22:17	met 41:23	13:25 14:15,18		36:21 41:4	18:17 21:24
labour 37:12	local 14:10	Metropolitan	Mulcaire 44:15	<b>O</b>	opportunity	27:18 28:3
lack 42:10 43:8	London 14:9	23:1	44:18	oath 1:11	18:18 23:14	30:9 33:14
lapses 25:23	long 44:5,25	middle 3:18,19		obligation 25:17	24:5 30:8	participated
large 12:12	longer 2:21	mid-May 3:3,9	<b>N</b>	observations	oppose 9:10	46:23
22:12 46:1	look 12:16 40:25	mind 1:11 24:15	name 4:21 11:15	45:19	options 2:11	particular 8:10
late 13:13 22:16	looked 11:23	35:22	names 39:2 44:4	observe 3:22	oral 17:20 20:8	9:21 29:2,2
law 10:19 21:9	Lord 1:3,6,9,19	minds 44:1	44:19	42:8 49:11	24:12,21 34:6	30:10 32:20
39:17 42:20,23	1:24 3:14	mindset 29:6	narrow 39:9	observed 26:7	orally 17:17 30:8	38:4,5
lawyer 40:10	12:14,20 15:19	47:12	nature 10:13	observer 49:13	order 9:10 11:21	particularly
lawyers 2:25,25	16:4,22 17:4,6	minutes 27:22	21:19 25:1	obstruct 28:13	16:13 27:18,19	21:21 35:9
3:6,15 6:2	17:10,19 27:22	Mirror 7:6,17,17	37:5,8 40:22	obtain 9:9 40:7	40:23 41:6,16	partner 7:2,5
14:15,19	28:2,10 33:9	8:3,7,24 9:7,9	41:1 42:4 43:4	obtaining 10:20	orders 42:21	partners 8:2
lead 2:1 13:23	35:8,17 39:13	mischief 43:25	near 48:10	obvious 31:17	ordinance 18:8	parts 13:20
14:3 31:23	41:12,18,25	misleading 39:12	nearly 7:8	40:19	organisation	patent 44:5
32:1 44:8,9	42:7 44:14,17	39:24 40:12	necessarily 19:6	obviously 2:7	35:10 46:1	pattern 14:14
leaders 48:22	45:3,16 46:5	misled 38:20	23:25 24:1	8:22 10:18	48:23	Paul 47:13
learn 20:18	47:9 48:1,5,16	47:22	27:8 47:8	13:16,24 16:5	ought 24:18	pause 3:12,16,18
28:17 51:7	49:3 51:10,19	misrepresent	51:19	16:16 25:11	outlined 25:25	payments 5:21
learnt 22:9	51:23 52:2	26:5	necessary 40:16	occasion 6:12	outstanding	6:19,20,25 7:3
leaving 12:11	loss 31:24	mistake 48:6	need 37:10	occasions 13:8	17:24 18:2	7:5,8,9,15,19
led 10:5 29:1	lot 10:3	mistakes 28:17	needed 40:23	29:12,13 32:12	overall 50:22	8:2,3,8
46:23	luncheon 52:10	misunderstand	needs 34:3 50:17	33:5 46:3	overfriendly	pending 12:24
left 19:8		21:23 26:4	Neil 47:19	occurred 48:12	49:23	people 4:5 15:14
legal 2:9 8:25	<b>M</b>	Misuse 12:22	never 38:6 45:5	odious 36:22	overly 37:15	17:7 22:13
10:11 25:20	Mackey's 42:6	Mm 14:7 15:11	nevertheless	offence 5:5	overwhelming	45:14
39:10	main 34:5	mobile 13:11,13	10:2	offences 2:8,10	36:18	perceived 37:15
legitimate 10:19	majority 8:20	14:1,8	new 6:4 21:22	6:1,4,4 8:17,19	over-arching	49:12
47:23 51:1	29:8	module 17:21	News 2:14 6:19	12:23	11:15	perception 29:1
length 36:14	make-up 14:18	22:18 28:19,20	7:6,15 8:25 9:8	offending 18:8	over-cosy 49:18	30:13,20 31:3
letter 21:12	making 35:18	30:18 33:16	9:14 13:10	offered 19:19	owed 25:17	31:4,7,14,17
23:10,13 25:16	38:8 46:7	41:9 42:16	15:21,23 29:24	20:5	o'clock 52:7	31:20,22,23,25
25:22,25	management	49:14 50:19,20	30:4 32:22	office 45:25	O'Connor's	32:9,14,16,24
letters 8:25	2:16 3:23	Modules 18:17	33:15,19 34:18	officer 6:24 7:10	51:12	33:15 34:1,12
23:16 24:2,23	15:24	moment 9:15	41:6 42:10	7:25 35:10		35:19 43:17
25:1,11,15	managing 46:1	13:19 42:18	43:12,22 44:13	38:12 46:6	<b>P</b>	46:18 47:2,24
level 17:15 42:13	Manchester 14:9	Monday 1:1	47:20	officers 5:19,22	paper 19:8 44:4	48:10,13 51:2
LEVESON 1:3,6	margin 12:12	money-launde...	newspaper 9:21	29:2,17 30:3	paperback 12:8	perfect 50:24
1:9,19,24	material 3:13	5:6 6:3	10:8 20:2	31:5,10 32:17	paragraph 1:25	perfectly 46:11
12:14,20 15:19	8:21 9:2,6	month 20:1	newspapers 6:20	33:6,18,22	2:5,12,20 3:9	period 49:17
16:4,22 17:4,6	10:16,21 11:3	months 26:10	7:7,11 9:1,11	35:11 36:17	3:22 4:3,4,22	periods 6:25
17:10,19 27:22	11:9 13:4,7,9	42:14 48:9	19:19 20:15	37:24 38:4	4:25 5:1,1,4,14	person 23:10,13
28:2,10 33:9	20:20 21:20	52:5	21:10 38:5	43:21 45:21,22	5:16 6:7,22	personal 11:20
35:8,17 39:13	22:6 41:3 44:2	morning 28:7	42:21	46:15 48:22	7:13,22,23 8:9	48:23
41:12,18,25	44:19	41:3 42:12	NGN 2:14	51:3,5	9:17,19 11:4	perspective
42:7 44:14,17	materially 33:23	motions 36:4	NI 33:21	offices 14:18	11:13 13:5,22	51:20
45:3,16 46:5	matter 4:19 6:14	motivated 38:9	nine 5:19 48:9	official 6:18,23	13:23 14:8,14	pervverting 4:19
47:9 48:1,5,16	8:13	Motorman 18:21	nonsense 38:1	7:25	18:22 23:5	Peter 36:21
49:3 51:10,19	matters 5:6	20:14,19 21:16	non-journalist	officials 5:19	24:14 25:24	38:12 45:24
51:23 52:2	23:21 48:17	move 11:12	4:14,25 5:3	Okay 11:12	31:1 33:3,17	phase 12:25
Lewis 2:20 3:1	Matthew 22:10	48:13	normally 45:11	ongoing 6:16	33:19 34:17	Phil 35:1
light 52:5	mean 45:11	moving 5:13	normal-size 12:8	open 21:12,24	36:9 37:2,19	phone 11:18 15:5
lightly 36:25	media 29:9,23	MPS 10:10 28:12	note 4:24 34:19	28:16	43:18 46:20	15:8 29:5,21
likelihood 24:20	30:16 32:20	28:15,21,23,23	51:24	opened 9:24	50:10	33:23 40:17
limited 8:20 19:6	33:16 36:11	29:2,3,7 30:5	notice 1:21 18:15	Operation 4:3	paragraphs 5:8	46:20
19:19 20:15	37:14,24 38:17	30:15 31:6	22:16	5:13 11:12	9:22 11:14	phones 13:14

14:1,22 phrase 36:21 45:13 phrases 33:1 picture 50:22 piece 12:16 44:4 piled 12:9 PIN 44:20 place 2:22,23 3:14 14:8 39:6 49:20 places 10:20 plain 29:1 plainly 33:7 35:25 38:24 49:10 planning 16:25 please 1:5 2:5 5:15 6:7 7:22 9:2 11:13 13:6 13:22 14:14 15:1 point 14:4 24:22 32:2 33:25 35:15,17 37:10 38:5 41:5 42:25 points 30:5,24 34:8,10 38:23 39:23 45:19 police 2:11 4:12 5:19,22 10:11 10:20 12:24 15:20 20:12 21:15 23:1 26:21 29:9,19 30:22 31:10,19 31:23,24 32:5 32:6,7,17,23 32:25 33:6,22 34:14 35:6,9 41:21,23 42:15 43:20 44:14 45:9,12 46:15 48:12 49:25 50:24 policy 30:16 position 3:5 4:5 5:15 16:16,19 21:5,7 23:1 26:6 49:25 51:11 positive 21:6 50:4 positively 46:16 possession 9:7 13:10 40:16 possibility 24:12 34:21 possible 16:14 20:25 24:4,7 24:24 25:12 postulated 20:25 potential 2:8 4:17 15:4 21:16 43:1	44:3,8 potentially 24:4 30:25 powerful 36:11 40:9 powers 2:11 practice 16:1,12 18:11 20:21 30:16 practices 25:6 26:14 practises 25:2 precisely 32:11 33:11 49:17 prefer 3:5 prejudice 17:6 prepared 16:15 22:5 24:11 48:24 present 19:1 42:8 51:11 presently 17:24 press 18:12 20:21 25:2,3,4 26:14,23 27:6 28:24 29:24 30:22 31:25 32:1,6 50:1,5,6 50:24 pressure 29:23 36:18 Presumably 51:20 Prevention 6:5 previous 6:12 11:22 previously 11:24 27:5 pre-charge 4:11 prima 21:2,3,8 primarily 2:13 33:25 51:2 prior 21:22 22:8 priority 36:20 prison 6:24,24 7:9,25 8:1 privacy 36:22 private 20:17 probability 20:23 probably 18:15 47:11 problem 32:9 42:5 problems 12:14 procedure 23:8 proceed 9:12 23:6 35:4 36:2 52:6 proceeded 21:24 proceeding 17:7 proceedings 43:8 process 9:15 15:4,5 24:3 43:10 produce 14:2	production 9:10 41:5,15 42:21 productive 4:1 professional 4:1 progress 9:3 17:22 18:6 26:20 50:20 proof 40:7 proper 11:1 29:10,13,14 30:12 properly 40:23 43:6,10 prosecuting 38:21 prosecution 44:22 protect 10:18 Protection 20:24 protocol 9:13,16 prove 19:11 38:8 39:4 41:18 45:13 provide 18:23 19:20 22:19 provided 1:15,21 10:3 13:8 18:16 19:23 20:1 22:6 23:14 provides 20:12 23:9 providing 44:5 provision 24:10 public 5:19 6:18 6:23 7:25 8:11 8:12,14,16,21 21:4 23:7 24:13 27:2 31:24 51:2 publicised 10:7 publicity 10:10 publish 26:1 published 7:1 21:14 22:3 25:23 purpose 19:5 23:19 25:20 26:5 purposes 13:4 42:8 pursue 37:5 pursued 19:23 39:15 put 12:18 19:24 25:7 36:6,24 38:6 46:11 putting 45:1	<hr/> R <hr/> raised 22:13 range 5:25 23:20 ranges 18:10 ranking 35:10 rare 29:12 rarest 29:12 rate 44:21 reach 14:3 20:20 25:9 39:17 reached 26:13 48:18 read 5:3 16:18 16:25 17:3 20:10 24:19 25:6 45:5 46:1 46:21 readily 44:24 reads 18:22 ready 5:24 51:7 real 21:16 31:20 33:20 realise 40:17 reality 30:14,22 31:3 32:15,25 33:15 34:14 43:17 46:19 47:24 reason 15:13 41:6 reasonable 8:18 23:14 reasonably 23:18,24 reasons 35:21 42:2 43:8 recalled 1:7 receive 46:9 received 6:18,20 11:3,10 15:19 15:20 26:11 29:15 39:20 42:14 recently-appoint... 45:22 recipient 23:14 23:23 25:18,19 39:7 recipients 23:20 25:22 recipient's 25:19 recognise 21:16 22:15 25:24 42:19 50:25 recognised 25:19 32:14 recognises 31:6 31:17 recommendati... 50:11,14,18	12:19 45:23 47:12 quickly 29:5 47:11 quite 1:19 11:1 <hr/> R <hr/> raised 22:13 range 5:25 23:20 ranges 18:10 ranking 35:10 rare 29:12 rarest 29:12 rate 44:21 reach 14:3 20:20 25:9 39:17 reached 26:13 48:18 read 5:3 16:18 16:25 17:3 20:10 24:19 25:6 45:5 46:1 46:21 readily 44:24 reads 18:22 ready 5:24 51:7 real 21:16 31:20 33:20 realise 40:17 reality 30:14,22 31:3 32:15,25 33:15 34:14 43:17 46:19 47:24 reason 15:13 41:6 reasonable 8:18 23:14 reasonably 23:18,24 reasons 35:21 42:2 43:8 recalled 1:7 receive 46:9 received 6:18,20 11:3,10 15:19 15:20 26:11 29:15 39:20 42:14 recently-appoint... 45:22 recipient 23:14 23:23 25:18,19 39:7 recipients 23:20 25:22 recipient's 25:19 recognise 21:16 22:15 25:24 42:19 50:25 recognised 25:19 32:14 recognises 31:6 31:17 recommendati... 50:11,14,18	reconsider 3:4 3:11 reconsidered 4:7 reconvene 24:12 record 20:9,10 21:14 22:3 24:20 27:7 records 11:20 18:25 refer 11:4 20:6 24:9 34:17 41:11 reference 25:5 26:15 referred 5:3 34:11 referring 25:2 regard 38:14 regarded 44:6 regarding 2:8 51:2 regular 2:21 related 6:25 7:15 relates 4:20 5:5 6:23 46:19 relating 22:13 25:1 42:20 relation 2:10 4:9 6:16 18:20 25:21 27:6 30:18 36:9 41:8 51:21 relations 30:16 50:23 relationship 3:12 4:1 22:19 29:16 33:21 37:14 38:17 49:16 50:5 relationships 28:23 29:19 30:3,21,23 31:11,15,18 32:6,22 34:2 34:13 37:21,23 38:4 47:20 relevant 11:22 14:2 20:2 21:21 26:12 28:22 reluctance 37:4 rely 40:9 remain 4:10 17:24 51:7 remaining 18:20 20:13 remains 36:9 remarkable 50:2 remember 2:22 42:11 reminded 41:2 remote 24:21 remotely 48:14 renewed 4:6 reopen 29:4 30:1 46:20	repeat 30:6 repeated 6:11 repeatedly 38:13 replaced 2:17 report 11:10 16:5,18 18:4 23:11,13 24:1 25:23 26:24 34:1 50:12,17 51:12 reported 18:19 26:4,16 reporters 32:18 reports 26:16 27:9,14 report's 50:14 represent 26:1 representations 23:21 24:10 representative 25:20 representatives 28:4 request 9:6 10:1 13:24 14:21 17:1 18:13 19:7 requesting 9:1 10:17 requests 10:15 require 19:6,11 20:7 22:2 25:13 35:21 requirement 39:4 requirements 39:10 requiring 19:15 research 12:15 resources 3:22 3:24 35:2 43:9 resource-inten... 40:22 respect 2:9 4:16 12:22 13:25 22:8 23:21 31:4 32:11 35:12 38:1 42:1 respectfully 41:10 47:14 respond 23:15 24:5,8 25:5 46:12 51:18 responded 21:10 response 9:5 15:20 19:4 20:2 24:13 25:10,13 33:23 41:24 46:9 responses 9:8 24:23 25:8 51:12 responsibilities 22:14 rest 42:22	restrictions 10:20 restrictive 40:5 result 9:18 10:3 11:8,11 13:7 13:25 resume 28:8 resumed 3:16 retention 19:12 retired 7:10 return 4:11 16:15 returnable 18:15 reveal 8:20 37:4 revealed 6:17 20:16 reveals 7:5 review 10:1 11:5 11:8,11 23:3 43:7 re-numbering 5:2 right 1:17 2:3,18 3:17 4:22 7:20 11:7 15:21 16:24 17:4,6 17:19 27:15 28:10 35:24 47:10,12 49:20 52:4 rightly 31:13 riot 46:2 rise 26:17 27:22 47:2 48:9 risk 20:3 robust 35:6 rock 49:19 rogue 45:8,11 root 36:5 Rule 17:24 22:22 22:24 23:9,11 23:16 24:22 25:1,15 rules 17:25,25 22:22,24 ruling 18:21 20:6 20:14 21:11 22:23,25 23:5 24:25
--	---	--	---	---	--	--	---

## S

39:3 45:20 50:7 secondly 30:14 secret 25:21 section 1:21 9:23 18:12,14 20:23 21:3 22:16 25:4 security 6:24 8:1 13:15 see 23:4 24:13 26:8 41:1 46:5 seek 41:5 seeking 2:13 21:3 seeks 38:7 seen 17:10 40:18 41:22 seized 11:24 20:16 Select 47:22 self-criticise 28:14 self-denying 18:8 self-fulfilling 41:22 self-justifying 41:22 seminars 26:11 send 23:9,15 senior 15:23 29:2 29:17 30:3 31:5,10 32:17 33:6,18,22 35:9 37:24 45:21,22 46:6 48:22 51:5 sense 39:25 45:20 sensible 17:21 29:10 35:8 46:3 sent 23:13 sentence 33:12 37:1 separate 11:17 35:12 41:8 September 18:15 20:2 29:4 serious 33:13 serve 22:16 served 8:25 serves 32:8 49:24 services 14:3 set 25:24 50:19 setting 23:16 severely 36:7 shakes 17:9 sharp 42:13 Sherborne 19:16 27:15 Sherborne's 18:23 19:9 short 19:4 20:17 27:25 32:9	34:6 38:23 49:7 51:24 shortly 24:25 50:9 show 34:13 47:18,21 sic 46:15 significance 37:8 44:2,3 significant 3:24 13:16 23:12 40:3 43:20 similar 14:14 similarly 29:25 simply 24:8 31:17,21 32:8 36:12 40:1 46:17 47:3 50:13 single 37:1 sir 1:4,13,23 7:20 12:21 16:3,21 28:12 30:10 31:16 33:11 35:13,23 37:11 39:8 42:12,25 45:20 46:11,25 47:13 48:4 49:1,5 50:7 51:12 52:1 six 12:21 skip 36:25 slide 48:12 slightly 8:23 9:11 27:17 slower 10:17 solicitors 21:13 somebody 45:17 somewhat 49:19 sort 41:23 43:24 sought 2:9 35:1 42:5 43:21 44:17 sound 50:25 source 31:6 sources 10:19 13:3 42:1 South 14:9 speak 2:5 27:19 28:4,7 specific 9:1 19:9 19:14 23:24 specifically 23:2 29:20 36:15 45:4 spectrum 24:10 Sprake 22:10,20 stage 14:12 15:22 16:7,10 17:8 29:22 43:12 51:24 stance 9:12 stances 49:2 standard 1:16 Standards 2:16 3:23	standpoints 49:13 Star 7:18,18 start 27:15 started 10:22 44:24 starts 5:13 state 33:20 statement 1:15 1:16,20,25 5:14 19:2,4 statements 16:25 17:10 20:10 stations 4:12 statute 39:14 Stephenson 47:13 Steve 20:17 stolen 12:23 13:11 14:1,22 storage 11:23 12:1 stories 7:1,14,17 8:7,20 story 14:25 straightforward 50:8 strategy 37:6 43:1,5,15 stress 10:25 strict 10:20 strong 36:10 subject 1:11 23:10 24:4 25:17 27:4 29:13 36:1 subjected 15:8 subjects 12:23 submission 24:17 30:23 33:3 36:5,16 40:3,12,19,25 42:6 43:7 45:5 46:25 submissions 17:7 17:12,12,14,20 21:18 24:6,9 28:11,19,20 30:6,7,10,17 30:19 31:1 32:13 33:17 34:6,7,9,10 36:15 37:11 38:23 41:8 42:17 46:21 49:14 50:10,19 50:21 submit 19:3 21:25 29:16,25 30:25 31:13 32:11 34:3 35:5 37:7 47:4 49:5,19,24 50:2,22 51:4 51:24 submits 29:7	submitted 13:1 submitting 18:18 subsequent 14:22 44:2 47:14 subsidiary 2:14 substantial 10:6 11:3 12:4,13 50:3 SUE 1:7 suffered 27:16 suffice 22:9 suffices 42:8 sufficient 24:8 40:9,25 45:1 suggest 14:10 29:11 34:23 38:2 39:21 43:12 44:25 suggested 21:18 44:20 46:2 50:11 suggestion 46:13 suggestive 35:5 sum 4:4 5:15 summarise 6:8 11:14 15:2 28:21 43:18 summarised 4:22 Sun 9:21 10:1,8 Sunday 7:17,18 superior 38:12 superiors 36:12 37:20 40:1 supplemented 22:25 supply 5:23 20:5 support 12:2 27:9 33:13 36:12 39:11 40:1 supported 46:22 suppose 2:15 suppress 37:18 sure 16:7 surrounding 47:1 suspect 8:17,19 17:17 37:10 suspected 7:18 10:4 suspicion 47:2 suspicions 46:24 suspicious 35:21 swayed 47:18	talk 6:9,13 team 14:18 25:18 42:9,22 43:14 telephone 14:8 telephones 13:11 telescope 40:20 tell 13:6,22 36:4 tempting 25:5 ten 26:10 52:5 terabyte 12:7,9 terabytes 11:25 12:11 terms 3:22 14:17 19:12 26:15 terrorist 36:19 37:8 test 8:12 tested 23:3 Thank 1:6,24 2:12 3:9 4:19 6:21 7:13 8:9 8:22 9:17 11:4 13:3 14:7 15:17 16:4,22 16:22 52:2,2,8 theft 14:8 theory 45:9 thereto 22:8 thing 17:5 think 3:19,20 4:20 5:8,10 6:12 8:7 9:6 14:14 15:3,7,9 15:12 40:10 44:18 45:13 47:9 48:24 51:13,16,23 third 20:13 21:7 38:11 thought 23:23 24:6 thoughts 26:2 threat 36:19 threatening 49:16 threats 10:11 37:9 three 3:16 5:22 12:10 17:23 18:20 20:25 21:12 22:25 34:16 38:23 thrust 50:16 time 12:5 15:3 17:3 18:16 23:4 34:20 35:25 39:14 44:6 49:17 times 12:10 36:23 52:4 timetable 23:4 time-consuming 40:21 timings 34:23 tip 14:5 title 19:4	titles 13:10 15:23 19:7,11,16 today 17:1 30:11 told 12:9 tomorrow 4:12 4:14 17:2,5 tomorrow's 5:7 top 12:9 topic 41:10 topics 17:16 44:18 total 7:8 8:5 15:9 tragic 26:18 transparent 28:16 transpired 26:16 trap 40:19 trapped 49:19 treated 25:17 Trinity 7:6 8:3 8:24 9:7,9 trouble 35:18 truth 1:16 31:17 try 28:14 trying 49:20 Tuleta 2:2 11:12 11:15 13:4 26:22 Tuleta's 14:21 turned 40:18 twice 1:9 20:4 two 3:16 8:22 10:9 18:21 30:11,24 33:4 45:19 49:1 50:7 type 22:6	47:6 unjust 32:8 unknown 13:19 unlawful 39:5 unwarranted 47:25 update 1:4 9:3 20:12 50:20 up-to-date 16:8 16:14,18 18:5 urge 47:14 48:6 use 19:14 20:19 useful 51:23
						V
						valid 31:21 46:25 47:3 validity 27:11 value 24:24 25:11 various 4:11 43:8 vast 29:8 verb 47:7 victim 43:5,15 victims 14:25 15:4,5,7,10,13 30:18 34:6 37:6 39:24 43:1 47:22 view 13:14 18:11 26:1,2 27:9 33:20 39:9,15 40:5 46:10 viewing 40:19 views 46:7,8 visited 15:20 voicemail 39:5 volition 11:5 volume 41:3 voluntary 3:13 3:15 9:13,15 10:3
						U
						ultimately 8:12 unable 15:14 uncovered 31:9 underappreciate 37:7 underline 24:23 undermine 27:9 understand 4:20 11:10 19:22 27:16,18 35:17 45:3 49:5 understanding 39:4 understood 39:17 48:22 undertake 11:21 undiscriminati... 42:19 unduly 31:15 34:12 unequivocally 29:15 unhappy 46:8 unhelpful 30:25 unidentified 44:10 unintentionally
						W
						wait 26:8 Wallis 47:19 want 4:25 17:7 21:6 28:5 30:10 warn 45:13 warning 23:9 24:2 25:16 45:21 wasn't 17:3 45:10 51:19 way 7:21 9:12 16:17 23:3 26:19 44:5,25 46:2 47:15 49:7 ways 27:1 week 22:11 weeks 3:13,17 8:22 22:7 Weeting 2:2 4:3



26:21 41:1	<b>World</b> 34:18	31:1 33:16	<b>75</b> 37:2			
<b>well-known</b> 6:3	<b>worse</b> 31:19	42:16 49:14	<b>76</b> 37:19			
<b>went</b> 45:5	<b>worsen</b> 32:8	50:19 52:7				
<b>West</b> 14:9	<b>worsening</b> 32:1	<b>2,615</b> 15:9	<b>8</b>			
<b>we'll</b> 13:24 27:17	<b>wouldn't</b> 40:8	<b>20</b> 1:16 39:1	<b>8</b> 2:20 11:25			
28:7 36:4	<b>writing</b> 19:20	<b>2005</b> 18:14	12:11			
41:14 52:6	<b>written</b> 28:19	<b>2006</b> 8:4 15:21	<b>81</b> 16:25			
<b>we're</b> 1:4 5:13,22	30:6,10,17	17:25 32:21	<b>82</b> 36:9			
7:24 9:15	36:15 37:11	34:19 36:8,19				
11:16,24 12:1	41:9 42:17	40:16 42:10	<b>9</b>			
14:1 15:13	<b>wrong</b> 20:22	<b>2009</b> 29:4 30:1	<b>9</b> 3:9			
49:19	39:8,19,23	32:21 46:19	<b>9.41</b> 24:14			
<b>we've</b> 2:7,9 6:18	40:11,20	47:1 48:20				
6:19 9:5,8,14	<b>wrongdoing</b>	<b>2010</b> 7:7 13:13				
11:21 12:21	30:14 32:20	29:4 30:1				
13:7,9,25 15:5	44:7	32:21 46:19				
15:8 17:1	<b>wrongly</b> 32:15	47:1				
38:22 41:7	<b>Y</b>	<b>2011</b> 7:7				
42:2	<b>Yates</b> 47:17 48:1	<b>2012</b> 1:1 8:4				
<b>whatsoever</b>	<b>year</b> 2:17 3:3,10	18:22 20:14				
17:18 34:24	7:10,12 10:7	22:8,23 23:5				
<b>whilst</b> 12:11	13:6	28:20				
50:24	<b>yielded</b> 11:6	<b>21</b> 1:21 6:7 9:23				
<b>Whittamore</b>		18:14 22:17				
18:25 19:8,13	<b>Z</b>	<b>22</b> 6:22 7:22				
20:17	<b>Zweifach</b> 2:17	<b>23</b> 1:1 5:18 7:13				
<b>wholly</b> 40:20	<b>I</b>	<b>24</b> 4:12,15 7:23				
44:1 47:24	1 3:14 18:17	<b>25</b> 8:9 34:19				
<b>whomsoever</b>	22:18,23 23:5	<b>26</b> 35:3				
20:11 46:7	50:20	<b>27</b> 9:17				
<b>widely</b> 18:9	<b>10</b> 3:22 20:2,14	<b>28</b> 9:19 10:7				
<b>widen</b> 36:8	25:24	30:18				
<b>wider</b> 25:8 39:15	<b>10(1)</b> 33:17	<b>3</b>				
<b>widespread</b> 32:4	<b>10.00</b> 1:2	<b>3</b> 28:20 50:20				
<b>wildly</b> 37:7	<b>10.35</b> 28:1	<b>31</b> 11:4				
<b>Williams</b> 35:1	<b>10.45</b> 27:24	<b>32</b> 33:3				
36:7,10 37:4	<b>101</b> 11:17 12:3	<b>33</b> 11:13,14				
37:13 38:3,8	<b>108</b> 43:18	<b>34</b> 11:14				
38:18 39:3,11	<b>109</b> 46:20	<b>35,000</b> 7:8				
40:15 41:7	<b>11</b> 4:11 8:22 10:8	<b>36</b> 13:5				
42:22 43:2,13	18:22,22 28:20	<b>38</b> 13:22				
46:14	<b>11-year-old</b>	<b>39</b> 13:23				
<b>Williams's</b> 38:11	26:19	<b>4</b>				
40:4	<b>11.32</b> 52:9	<b>4</b> 1:25 41:9				
<b>willing</b> 28:16	<b>12</b> 4:3,10 11:25	<b>40</b> 14:8				
<b>willingness</b>	12:11 33:19	<b>41</b> 5:17 14:14				
14:23	<b>13</b> 4:4 5:1,4	<b>42</b> 15:2				
<b>wish</b> 9:12 17:11	17:24 22:22,24	<b>44</b> 15:15				
18:18,23 22:18	23:9,16 24:22	<b>45</b> 15:16				
25:14 26:20	25:1	<b>46</b> 15:2				
<b>wished</b> 20:19	<b>13(3)</b> 23:11	<b>48</b> 34:17				
46:8	<b>14</b> 3:20 4:22 5:1	<b>5</b>				
<b>witness</b> 1:15 19:2	25:15	<b>5</b> 2:5				
<b>witnesses</b> 21:21	<b>14,000</b> 8:6	<b>55</b> 20:23 21:3				
32:2	<b>15</b> 4:8,25 39:1	<b>6</b>				
<b>word</b> 6:11	<b>16</b> 5:8	<b>6</b> 2:12 50:10				
<b>work</b> 20:3 22:12	<b>17</b> 5:8 28:21	<b>64</b> 23:5				
30:15 40:22	<b>18</b> 5:14 9:5 34:25	<b>7</b>				
41:2 42:23	<b>19</b> 5:16	<b>70</b> 11:25				
44:9 50:4,6,17	<b>1998</b> 20:24	<b>702</b> 15:9,12				
50:18	<b>2</b>					
<b>worked</b> 2:7 9:23	2 4:13 18:17					
38:14	28:19 30:18					
<b>working</b> 39:3						
43:10						
<b>workings</b> 25:21						

# **EXHIBIT V**

This site uses cookies. By continuing to browse the site you are agreeing to our use of cookies. [Find out more here](#)

theguardian

## Phone hacking: six arrested under Operation Weeting

Arrests in London, Oxfordshire, Hampshire and Hertfordshire on suspicion of conspiracy to pervert the course of justice

---

Josh Halliday and Vikram Dodd  
guardian.co.uk, Tuesday 13 March 2012 05.10 EDT

---



Phone hacking: six people have been arrested by Scotland Yard detectives under Operation Weeting. Photograph: Dominic Lipinski/PA

Six people have been arrested by Metropolitan police detectives investigating phone hacking.

Five men and one woman were arrested on Tuesday morning at addresses in London, Oxfordshire, Hampshire and Hertfordshire by officers from Operation Weeting.

All six were arrested on suspicion of conspiracy to pervert the course of justice.

The Met police said a 43-year-old woman was arrested at home in Oxfordshire; a 39-year-old man was held in Hampshire; a 46-year-old man was arrested in west London; a 49-year-old man was arrested in Oxfordshire; a 39-year-old man was arrested in Hampshire; a 38-year-old man was arrested in Hertfordshire, and a 48-year-old man was arrested at a business address in East London.

All six were arrested between 5am and 7am on Tuesday and are being interviewed at police stations.

Scotland Yard said in a statement: "A number of addresses connected to the arrests are being searched.

"Today's operation follows consultation with the Crown Prosecution Service."

Police said the arrests did not result from information passed to them by News Corporation's management and standards committee. A number of past arrests followed News Corp's MSC, which is reviewing internal emails and documents, passing suspicious-looking ones to the Weeting team.

The arrests form the biggest single swoop yet by the Met police in its ongoing investigation into alleged voicemail interception. So far 22 people have been held under Operation Weeting, with two people released without charge.

- *To contact the MediaGuardian news desk email [editor@mediaguardian.co.uk](mailto:editor@mediaguardian.co.uk) or phone 020 3353 3857. For all other inquiries please call the main Guardian switchboard on 020 3353 2000. If you are writing a comment for publication, please mark clearly "for publication".*
- *To get the latest media news to your desktop or mobile, follow MediaGuardian on [Twitter](#) and [Facebook](#)*

## **Ads by Google**

**British food store USA**

Tea, sweets, crisps, biscuits, cake drinks & gravy. Fast shipping

[www.englishteastore.com](http://www.englishteastore.com)

**"Shocking" Horscopes**

Insert your birthdate & get answers about Past, Present & Future. Free

[www.PremiumAstrology.com](http://www.PremiumAstrology.com)

**Become a Social Worker**

With an Online Master's from USC. No Relocating Required. Learn More!

[msw.USC.edu/Virtual-Academic-Center](http://msw.USC.edu/Virtual-Academic-Center)

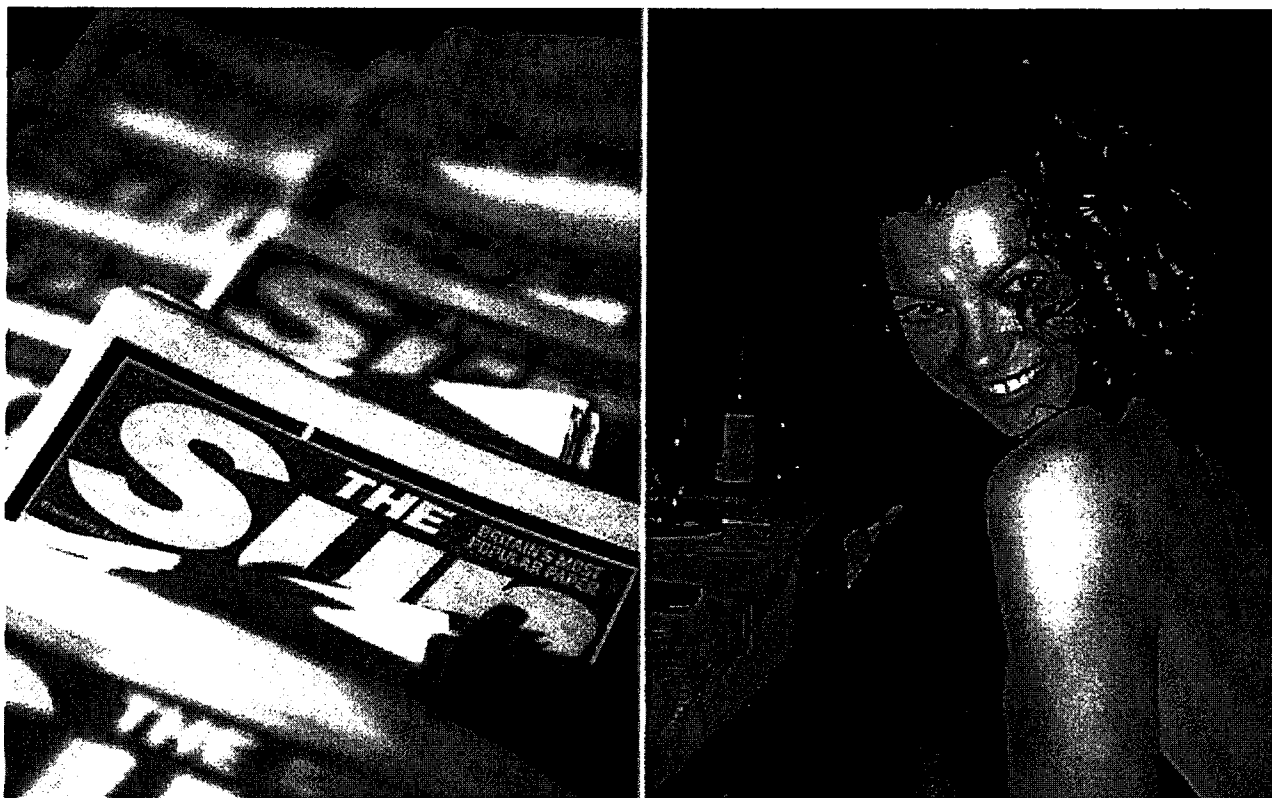
© 2012 Guardian News and Media Limited or its affiliated companies. All rights reserved.

;

# **EXHIBIT W**

## The Sun's Whitehall Editor arrested in illegal payments probe

Clodagh Hartley, the Sun's Whitehall Editor, has been arrested as part of the investigation into illegal payments to public officials, News International sources have confirmed.



She was arrested on suspicion of conspiracy to corrupt and suspicion of conspiracy to cause misconduct in a public office

By Martin Evans, Crime Correspondent

3:07PM BST 25 May 2012

The 37-year-old, who became the paper's first female lobby journalist three years ago, was arrested when she attended Bromley Police Station by appointment this morning.

She was arrested on suspicion of conspiracy to corrupt and suspicion of conspiracy to cause misconduct in a public office.

Ms Hartley is a long standing Sun reporter who has worked in Los Angeles for the paper and has also had spells as the consumer affairs correspondent and home affairs correspondent.

When she was appointed to the paper's lobby staff three years ago, the then political editor, George Pascoe-Watson described her as a "distinguished veteran news reporter with ten years experience on

the road”.

It is understood she has been on maternity leave from the paper in recent months.

She is the 30th person to be arrested as part of Operation Elveden, which was set up to investigate allegations that journalists had illegally paid police officers and public officials for information and stories.

The investigation, which is being supervised by the Independent Police Complaints Commission, is running alongside Operation Weeting which is examining phone hacking allegations at the News of the World newspaper.

A Scotland Yard spokesman said: “The 37-year-old woman attended Bromley Police Station by appointment and was arrested on suspicion of conspiracy to corrupt under the Prevention of Corruption Act 1906, suspicion of conspiracy to cause misconduct in a public office, contrary to Common Law and suspicion of bribery, contrary to the Bribery Act 2010.”

In an internal memo to staff, News International chief executive Tom Mockridge said: "I am sorry to inform you that a further News International employee has been arrested by the police in connection with Operation Elveden."

He added: "As I have said before, it is important that proper due process takes its course and we must not prejudge the outcome of the police interviews. The company is continuing to do everything it can to assist our colleague, and has provided her with legal support. I appreciate this is difficult news for everyone and I am grateful for your continued hard work."

The arrest followed information that was passed to the police by News Corporation's Management and Standards Committee, set up by Rupert Murdoch in the wake of the hacking scandal last summer.

The company is carrying out internal investigations relating to Mr Murdoch's remaining UK papers – The Sun, the Times and the Sunday Times – and is working closely with the police team investigating alleged phone-hacking and corrupt payments to police and other public officials.

Among the arrests so far are a number of senior Sun journalists as well as police officers, members of the armed forces and a worker from HM Customs and Revenue.

# **EXHIBIT X**





The Crown Prosecution Service. The CPS incorporates RCPO.

# Operation Weeting - CPS charging decisions

24/07/2012

Statement from Alison Levitt QC, Principal Legal Advisor to the Director of Public Prosecutions (DPP):

This statement is made in the interests of transparency and accountability to explain the decisions reached in relation to Operation Weeting.

During June and July 2012, the Crown Prosecution Service received files of evidence from the Metropolitan Police Service, relating to thirteen suspects. This has followed a period of consultation and cooperation between police and prosecutors which has taken place over many months.

All the evidence has now carefully been considered. Applying the two-stage test in the Code for Crown Prosecutors I have concluded that in relation to eight of these thirteen suspects there is sufficient evidence for there to be a realistic prospect of conviction in relation to one or more offences.

I then considered the second stage of the test, applying the DPP's interim guidelines on assessing the public interest in cases involving the media, and I have concluded that a prosecution is required in the public interest in relation to each of these eight suspects.

The eight who will be charged are: **Rebekah Brooks, Andrew Coulson, Stuart Kuttner, Glenn Mulcaire, Greg Miskiw, Ian Edmondson, Neville Thurlbeck and James Weatherup.**

They will face a total of nineteen charges in all. The full wording of all the charges will be made available, which will include the names of others whom the prosecution say are victims, but for now I shall summarise them as follows.

All, with the exception of Glenn Mulcaire, will be charged with conspiring to intercept communications without lawful authority, from 3rd October 2000 to 9th August 2006. The communications in question are the voicemail messages of well-known people and/or

## Decision to Charge

Once the Police have completed their investigations, they will refer the case to the Crown Prosecution Service for advice on how to proceed. We will then make a decision on whether a suspect should be charged, and what that charge should be.

[Find out more about how we decide whether to charge a suspect](#)

[Find out more about private prosecutions](#)

## The Role of The Crown Prosecution Service

The Crown Prosecution Service is the government department responsible for prosecuting criminal cases investigated by the police in England and Wales.

As the principal prosecuting authority in England and Wales, we are responsible for:

- advising the police on cases for possible prosecution

those associated with them. There is a schedule containing the names of over 600 people whom the prosecution will say are the victims of this offence.

In addition, each will face a number of further charges of conspiracy unlawfully to intercept communications, as follows:

**Rebekah Brooks** will face two additional charges:

- the first relates to the voicemails of the late Milly Dowler
- the second to the voicemails of Andrew Gilchrist

**Andrew Coulson** will face four additional charges, relating to the following victims:

- Milly Dowler
- the Rt Hon David Blunkett MP
- the Rt Hon Charles Clarke, and
- Calum Best

**Stuart Kuttner** will face two additional charges, relating to:

- Milly Dowler and
- the Rt Hon David Blunkett MP

**Greg Miskiw** will face nine further charges, relating to the following victims or groups of victims:

- Milly Dowler
- Sven-Goran Eriksson
- Abigail Titmuss and John Leslie
- Andrew Gilchrist
- the Rt Hon David Blunkett MP
- Delia Smith
- the Rt Hon Charles Clarke
- Jude Law, Sadie Frost and Sienna Miller, and
- Wayne Rooney

**Ian Edmondson** will face a further eleven charges, relating to the following victims or groups of victims:

- the Rt Hon David Blunkett MP
- the Rt Hon Charles Clarke
- Jude Law, Sadie Frost and Sienna Miller
- Mark Oaten
- Wayne Rooney
- Calum Best

- reviewing cases submitted by the police
- determining any charges in more serious or complex cases
- preparing cases for court
- presenting cases at court

[Find out more about the role of the Crown Prosecution Service](#)

---

- the Rt Hon Dame Tessa Jowell MP and David Mills
- the Rt Hon Lord Prescott
- Professor John Tulloch
- Lord Frederick Windsor
- Sir Paul McCartney and Heather Mills

**Neville Thurlbeck** will face a further seven charges in relation to the following victims or groups of victims:

- Milly Dowler
- Sven-Goran Eriksson
- the Rt Hon David Blunkett MP
- the Rt Hon Charles Clarke
- Angelina Jolie and Brad Pitt
- Mark Oaten
- the Rt Hon Dame Tessa Jowell MP and David Mills

**James Weatherup** will face a further seven charges in relation to the following victims or groups of victims:

- the Rt Hon David Blunkett MP
- the Rt Hon Charles Clarke
- Jude Law, Sadie Frost and Sienna Miller
- Angelina Jolie and Brad Pitt
- Wayne Rooney
- the Rt Hon Lord Prescott
- Sir Paul McCartney and Heather Mills

For legal reasons, **Glenn Mulcaire** does not face the first of these charges. However, he will face four charges, relating to:

- Milly Dowler
- Andrew Gilchrist
- Delia Smith, and
- the Rt Hon Charles Clarke

In relation to three of the remaining suspects, I have concluded that there is insufficient evidence for there to be a realistic prospect of conviction. It follows that no further action will be taken in relation to them. Because others are now about to be charged, it would not be appropriate for me to give reasons for these decisions at this stage.

There are two suspects in relation to whom the police have asked me to defer making a decision whilst further enquiries are made. For this reason I do not intend to give their names or say anything further about them at this stage.

The eleven suspects have this morning been informed of my decision. They are all due to answer

their bail at police stations. When they do so, the eight whom I have already named will be charged. Following charge, these individuals will appear before Westminster Magistrates' Court on a date to be determined.

The police intend to contact all the victims who will then be told that their names appear on the indictment. Once all have been informed the full list of those whom the prosecution says were victims will be made available.

May I remind all concerned that these eight individuals now will be charged with criminal offences and that each has a right to a fair trial. It is very important that nothing is said, or reported, which could prejudice that trial. For these reasons it would be inappropriate for me to comment further.

**Ends**

## Charges in full:

1. CHARGE 1: Rebekah Brooks, Andrew Coulson, Stuart Kuttner, Greg Miskiw, Ian Edmondson, Neville Thurlbeck and James Weatherup, between the 3rd day of October 2000 and the 9th day of August 2006 conspired together, and with Glenn Mulcaire and Clive Goodman and persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of well-known people and those associated with them, including but not limited to those whose names appear on schedule 1.
2. CHARGE 2: Rebekah Brooks, Andrew Coulson, Stuart Kuttner, Glenn Mulcaire, Greg Miskiw and Neville Thurlbeck, between the 9th day of April 2002 and the 21st day of April 2002, conspired together and with persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Amanda Dowler, also known as Milly Dowler.
3. CHARGE 3: Greg Miskiw and Neville Thurlbeck, between 13th day of May 2002 and the 29th day of June 2006, conspired together and with Glenn Mulcaire and persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Sven-Goran Eriksson and persons associated with Sven-Goran Eriksson, including Faria Alam.
4. CHARGE 4: Greg Miskiw between the 22nd day of October 2002 and the 21st day of July 2006, conspired with Glenn Mulcaire and with persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Abigail Titmuss and John Leslie and those associated with Abigail Titmuss and John Leslie, including Matthew McGuinness.
5. CHARGE 5: Rebekah Brooks, Glenn Mulcaire and Greg Miskiw, between the 3rd day of December 2002 and the 22nd day of January 2003, conspired together and with persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Andrew Gilchrist.
6. CHARGE 6: Andrew Coulson, Stuart Kuttner, Greg Miskiw, Ian Edmondson, Neville Thurlbeck and James Weatherup, between the 1st day of January 2004 and the 29th day of July 2006, conspired together and with Glenn Mulcaire and persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of persons associated with The Right Honourable David Blunkett MP, including some or all of the following: Kimberley Quinn, Sally King (nee Anderson), Andrew King, John Anderson and Jason Carey.

7. CHARGE 7: Glenn Mulcaire and Greg Miskiw, between the 28th day of February 2005 and the 12th day of March 2005 conspired together and with persons unknown to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Delia Smith and of persons associated with Delia Smith, including Michael Wynn-Jones and Ian Christmas.
8. CHARGE 8: Andrew Coulson, Glenn Mulcaire, Greg Miskiw, Ian Edmondson, Neville Thurlbeck and James Weatherup, between the 6th day of April 2005 and the 22nd day of June 2005, conspired together and with persons unknown to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of persons associated with The Right Honourable Charles Clarke, who included either or both of the following: Hannah Pawlby and Lucy Pawlby.
9. CHARGE 9: Greg Miskiw, Ian Edmondson and James Weatherup between the 1st day of July 2005 and the 1st day of June 2006, conspired together, and with Glenn Mulcaire and persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Jude Law and persons associated with Jude Law, Sadie Frost and Sienna Miller, who included some or all of the following: Jade Schmidt, Archie Keswick and Ben Jackson.
10. CHARGE 10: Neville Thurlbeck and James Weatherup, between the 5th day of July 2005 and the 4th day of May 2006, conspired together, and with Glenn Mulcaire and persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of persons associated with Angelina Jolie and Brad Pitt, who included Eunice Huthart.
11. CHARGE 11: Ian Edmondson and Neville Thurlbeck, between the 9th day of January 2006 and the 6th day of May 2006, conspired together and with Glenn Mulcaire and persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Mark Oaten.
12. CHARGE 12: Ian Edmondson and James Weatherup, between the 17th day of January 2006 and the 1st day of August 2006, conspired together, and with Glenn Mulcaire and persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Wayne Rooney and persons associated with Wayne Rooney, who included either or both of the following: Laura Jane Rooney and Patricia Tierney.
13. CHARGE 13: Greg Miskiw, between the 17th day of January 2006 and 1st day of August 2006 conspired with Glenn Mulcaire and persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Wayne Rooney and persons associated with Wayne Rooney, who included either or both of the following: Laura Jane Rooney and Patricia Tierney.
14. CHARGE 14: Andrew Coulson and Ian Edmondson, between the 23 March 2006 and the 21st day of May 2006, conspired together and with Glenn Mulcaire and persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Calum Best.
15. CHARGE 15: Ian Edmondson and Neville Thurlbeck between the 2nd day of March 2006 and the 26th day of July 2006, conspired with Glenn Mulcaire and with persons unknown to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of The Right Honourable Dame Tessa Jowell MP and David Mills.
16. CHARGE 16: Ian Edmondson and James Weatherup, between the 24th day of April 2006 and the 22nd day of June 2006, conspired together and with Glenn Mulcaire and persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely

the voicemail messages of persons associated with The Right Honourable Lord Prescott, who included some or all of the following: Tracey Temple, Joan Hammell and Alan Schofield.

17. CHARGE 17: Ian Edmondson, between the 25th day of April 2006 and the 15th day of May 2006, conspired with Glenn Mulcaire and with persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Professor John Tulloch and persons associated with Professor John Tulloch, who included some or all of the following: John Davies, Maire Messenger Davies and Janet Andrew.
  18. CHARGE 18: Ian Edmondson, between the 25th day of April 2006 and the 1st day of June 2006, conspired with Glenn Mulcaire and persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Lord Frederick Windsor.
  19. CHARGE 19: Ian Edmondson and James Weatherup, between the 15th day of May 2006 and the 29th day of June 2006, conspired together and with Glenn Mulcaire and with persons unknown, to intercept communications in the course of their transmission, without lawful authority, namely the voicemail messages of Sir Paul McCartney and Heather Mills, and of persons associated with Sir Paul McCartney and Heather Mills, including some or all of the following: Fiona Mills, Stuart Bell, Alan Edwards and Chris Terrill.
-



The Crown Prosecution Service. The CPS incorporates RCPO.

---

# Charging announcement in relation to offences of perverting the course of justice against Rebekah Brooks and others

15/05/2012

Alison Levitt, QC, Principal Legal Advisor to the Director of Public Prosecutions, oversees CPS decision making, and all potential prosecutions, in relation to the ongoing phone hacking investigations and other related matters.

Miss Levitt said: "This statement is made in the interests of transparency and accountability to explain the decisions reached in respect of allegations that Rebekah Brooks conspired with her husband, Charles Brooks, and others to pervert the course of justice.

"The Crown Prosecution Service received a file of evidence from the Metropolitan Police Service on 27th March 2012 in relation to seven suspects:

- Rebekah Brooks;
- Charles Brooks;
- Cheryl Carter - Mrs Brooks' personal assistant;
- Mark Hanna - Head of Security at News International;
- Paul Edwards - Mrs Brooks' chauffeur who was employed by News International;
- Daryl Jorsling and a seventh suspect - both of whom provided security for Mrs Brooks supplied by News International.

"All the evidence has now carefully been considered.

"Applying the two-stage test in the Code for Crown Prosecutors I have concluded that in relation to all suspects except the seventh, there is sufficient evidence for there to be a realistic prospect of

## Decision to Charge

Once the Police have completed their investigations, they will refer the case to the Crown Prosecution Service for advice on how to proceed. We will then make a decision on whether a suspect should be charged, and what that charge should be.

[Find out more about how we decide whether to charge a suspect](#)

[Find out more about private prosecutions](#)

---

## The Role of The Crown Prosecution Service

The Crown Prosecution Service is the government department responsible for prosecuting criminal cases investigated by the police in England and Wales.

As the principal prosecuting authority in England and Wales, we are responsible for:

- advising the police on cases for possible prosecution

conviction.

"I then considered the second stage of the test, and I have concluded that a prosecution is required in the public interest in relation to each of the other six.

"All seven suspects have this morning been informed of my decisions.

"They are all due to answer their bail at police stations later today. When they do so, they will be charged as follows:

- reviewing cases submitted by the police
- determining any charges in all but minor cases
- preparing cases for court
- presenting cases at court

• **CHARGE 1 - CONSPIRACY TO PERVERT THE COURSE OF JUSTICE**

[Find out more about the role of the Crown Prosecution Service](#)

---

Rebekah Brooks between 6th July and 19th July 2011 conspired with Charles Brooks, Cheryl Carter, Mark Hanna, Paul Edwards, Daryl Jorsling and persons unknown to conceal material from officers of the Metropolitan Police Service.

• **CHARGE 2 - CONSPIRACY TO PERVERT THE COURSE OF JUSTICE**

Rebekah Brooks and Cheryl Carter between 6th July and 9th July 2011 conspired together permanently to remove seven boxes of material from the archive of News International.

• **CHARGE 3 - CONSPIRACY TO PERVERT THE COURSE OF JUSTICE**

Rebekah Brooks, Charles Brooks, Mark Hanna, Paul Edwards and Daryl Jorsling conspired together and with persons unknown, between 15th July and 19th July 2011, to conceal documents, computers and other electronic equipment from officers of the Metropolitan Police Service.

"All these matters relate to the ongoing police investigation into allegations of phone hacking and corruption of public officials in relation to the News of the World and The Sun newspapers.

"Following charge, these individuals will appear before Westminster Magistrates' Court on a date to be determined.

"No further action will be taken against the seventh suspect.

"May I remind all concerned that these six individuals now will be charged with criminal offences and that each has a right to a fair trial. It is very important that nothing is said, or reported, which could prejudice that trial. For these reasons it would be inappropriate for me to comment further."

---



# **EXHIBIT Z**

## Phone hacking: Milly Dowler family set for £3 million News International payout

The family of the murdered schoolgirl Milly Dowler have been offered £3 million in damages from News International after the publisher of the News of the World admitted her phone had been hacked.



Photo: PA

By Gordon Rayner, and Andrew Hough

6:30AM BST 20 Sep 2011

The payout will include a personal £1 million donation to charity from Rupert Murdoch, the News Corporation chief executive and chairman, as well a £2 million settlement directly to the Dowler family.

James Murdoch, the chairman of News International, is understood to have personally approved the offer as the company tries to rebuild its reputation following the scandal which led to the closure of the Sunday tabloid.

Sources close to the negotiations said an initial offer of £1m to the Dowler family and a further £1m

to a charity in memory of Milly had been rejected by the Dowlers, and that the final sum would now be £3m, of which £2m will go to the family.

The offer is currently being considered by the family and has yet to be accepted after they had hoped for a payout closer to £3.5m.

Sources also said the £1 million donation will come from Rupert Murdoch personally. It is not yet known which charities are set to benefit.

The settlement is three times the biggest payout to any other victim of phone hacking, but reflects the gravity of the actions of News of the World journalists in accessing the murder victim's voicemails.

The 13 year-old was still being treated as a missing person when the News of the World arranged for her messages to be intercepted in 2002.

In July, Rupert Murdoch, the head of News International's parent company, met the Dowler family to make a personal apology to them.

James Murdoch shut down the News of the World as a direct result of the discovery that Milly Dowler's phone had been hacked. Rebekah Brooks, the chief executive of News International, later resigned.

A News International spokeswoman confirmed on Monday night that it was in "advanced negotiations" with the family about a compensation settlement.

She added: "No final agreement has yet been reached, but we hope to conclude the discussions as quickly as possible."

Mark Lewis, the solicitor representing the Dowler family, declined to comment on the negotiations, saying only that the final figure would be "substantial".

© Copyright of Telegraph Media Group Limited 2012