

**IN THE HIGH COURT OF JUSTICE**  
**BUSINESS AND PROPERTY COURTS**  
**BUSINESS LIST**

**IN THE MATTER OF THE MOBILE TELEPHONE VOICEMAIL INTERCEPTION**  
**LITIGATION**

**B E T W E E N:**

**VOICEMAIL CLAIMANT**

**- and -**

**Claimant**

**NEWS GROUP NEWSPAPERS LIMITED**

**Defendant**

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**PI ANNEX TO THE RE-RE-AMENDED GENERIC PARTICULARS OF  
CONCEALMENT AND DESTRUCTION**

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## **Various Claimants v News Group Newspapers Limited**

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### **PI Annex**

1. The Claimants will rely on NGN's use of private investigators, blaggers and others (collectively referred to as "PIs" herein), who, it is to be inferred from all the circumstances and as set out in the main statements of case, (i) obtained private information by unlawful means and NGN's journalists and executives were aware of the unlawful information gathering ("UIG") activities carried out by the PIs on NGN's behalf, or (ii) were commissioned by NGN to obtain information, and did so lawfully, but which information NGN then used for UIG. The PIs of which the Claimants are currently aware fall into one or more of the following categories:

- (a) "private investigators", "private eyes" or "private detectives";
- (b) blaggers (also known as "pretext blaggers") who used deception to obtain private and/or confidential information, mainly in "pretext" phone calls (also called "spoof" calls or "moody" calls) and/or by comparable means;
- (c) "bin-spinners", who stole private and/or confidential information from waste intended for disposal on domestic or business premises;
- (d) tracers, search agents and genealogists (or those who described themselves as such) who used:
  - (1) unlawful means to obtain private and/or confidential information which was not publicly available, including current, former or forwarding addresses; and/or
  - (2) lawful methods to obtain personal information which was publicly available – for example births, marriages and deaths ("BMD") information, company/directors information, Land Registry information, Electoral Roll information (from the edited Roll or before access to parts of the Electoral Roll for such purposes was restricted by law in 2002) and websites such as Friends Reunited, which information was subsequently used by NGN for UIG to obtain private and/or confidential information (as set out further in paragraph (4) below);
- (e) freelancers (also called "stringers" when based in foreign jurisdictions) and whose activities (if conducted in England and Wales) would be unlawful in this jurisdiction who:
  - (1) were commissioned by NGN to use blagging or other UIG for stories or leads, or to instruct PIs in relation to the same; or
  - (2) offered tips and stories to NGN containing private and/or confidential information obtained through the use of UIG;

and where, in respect of any events in a jurisdiction other than England and Wales,

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if and insofar as necessary, the Claimants will rely upon the presumption that the foreign law of the relevant jurisdiction(s) is the same as English law (such a presumption being fair and reasonable taking into account the nature of the activities complained of and the fundamental rights protected);

- (f) professional tipsters (including some of the freelance reporters in category (e) above), who obtained information unlawfully by blagging, unlawful payments to public officials and company employees or who used other PIs for the same, and who passed the product to NGN, which was aware that UIG had been used;
  - (g) police and public officials who unlawfully disclosed, either as unsolicited tips or on request, private and/ or confidential information (for example from the Police National Computer) to NGN including in exchange for payment or benefit in kind, and which the Claimants contend amounted to unlawful misconduct of which NGN was aware;
  - (h) private sector employees (for example travel agents, airline workers or hotel staff) who unlawfully disclosed private and/or confidential information obtained in the course of their employment to NGN, either as unsolicited tips or on request, including in exchange for payment or benefit in kind, and in respect of which the Claimants contend that NGN was aware of the unlawful nature of those activities;
  - (i) photographers and picture agencies who, in order to obtain pictures (and related information) of a targeted individual or occasion:
    - (1) were commissioned by NGN to use blagging and/or other UIG techniques (or who instructed other PIs to carry out the same); or
    - (2) used blagging and/or other UIG techniques (or who instructed other PIs to carry out the same) where the product of these activities was then sold to NGN as a tip or story, where the Claimants contend that NGN was aware of the unlawful nature of those activities;
  - (j) photographers (including some of those in category (i) above), freelancers (including some of the freelancers in category (e) above) who were commissioned by NGN to carry out intrusive surveillance of the Claimants and/or their Associates;
    - (1) to gather non-specific information (a “fishing expedition”) or based on information (“tips”) obtained unlawfully, with no true public interest justification or valid public interest defence; and/or
    - (2) to tail targets covertly for days (an activity called a "follow"), including using long lenses and to look into and/or photograph private property;
- in circumstances where the target had a reasonable expectation of privacy and/or the disclosure of information obtained would amount to an actionable breach of confidence or a misuse of private information;

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- (k) individuals and entities (including some of those in category (j) above), who (with or without knowledge of NGN's unlawful purpose):
  - (1) supplied surveillance equipment (for example listening devices, "button-hole" cameras and camera bags) used for unlawful activity or used against targets selected by UIG; and/or
  - (2) provided services involving the editing of the covert recordings referred to above to create misleading content;
- (l) individuals and entities who on NGN's behalf:
  - (1) inserted covert tracking devices in cars and/or listening/recording devices in cars and premises, including by way of unlawful entry or trespass; or
  - (2) entered premises for the purpose of theft and/or the planting of covert listening/recording devices;
- (m) individuals who worked with, or on investigations led by, Mazher Mahmood (the "Mahmood Associates") who, pending full disclosure:
  - (1) carried out unlawful activities, including UIG;
  - (2) worked on leads or stories based on, or sourced from, unlawful activities; or
  - (3) carried out activities in (k) and/or (l) above; and
- (n) individuals and entities who supplied NGN with controlled drugs and/or sex workers for and on behalf of NGN to entrap, and manufacture stories about, Claimants and/or their Associates (who were selected and/or set up using UIG) in order to falsely portray them as users/suppliers of controlled drugs, and/or as users or controllers of sex workers.

2. Pending full disclosure by NGN of:

- (a) Journal Upload (from January 1994 to August 1997) payment records; ZA, ZC, ZE (in relevant cases), SAP payments records (from 1997-2012), and Casuals Management System payment records (from 2006) to;
- (b) underlying invoices from;
- (c) emails to, from and about;
- (d) call data from NGN to; and

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- (e) relevant cash payment records, Thomas Cook records and expenses claims showing cash payments to

the-above listed categories of PIs and/or their associated businesses, business associates, employing company, sub-contractors, intermediaries, other fronts for the PI and other “alternative payees” (namely, spouses, partners, employees) (referred to herein collectively as the PIs’ “**aliases**”) the Claimants will refer to the facts and matters in paragraphs 3-9 below.

3. It is to be inferred that the activities set out below carried out by PIs and their aliases were (unless otherwise stated), (i) unlawful; (ii) known to be unlawful by NGN (including by the journalists and executives who commissioned the activities, encouraged and/or instructed the commissioning of the activities, approved the commissioning and/or payments, and authorised the payments); and (iii) (where the private information obtained by NGN belongs to a Claimant and/or their Associates) in each instance amount to an actionable misuse of private information and/or breach of confidence:

- (a) **pretext blagging**: the obtaining by deceit (including by phone calls) of private and/or confidential information relating to the Claimant or to their Associates where such Associates’ private and/or confidential information assisted in obtaining, the Claimant’s private information, such as ex-directory landline telephone numbers, mobile phone numbers, itemised phone bills, vehicle registration numbers, criminal records, medical records/information, utility payment records, bank records, financial information (for example tax information), credit card purchases, travel plans (including airline, hotel and restaurant bookings), National Insurance numbers, social security/benefits information, forwarding addresses (from the post office or neighbours) and phone subscriber information (by landline and mobile phone number reversals);
- (b) **unlawful payments**: the obtaining of private and/or confidential information through unlawful payments and/or benefits in kind, from police officers, (for example for accessing the Police National Computer), other public officials (for example prison officers, DVLA, HMRC/Inland Revenue and DHSS/Benefits Agency/DWP staff, hospital employees, Passport Office and other Home Office workers) or business employees (such as phone company, estate agent, hotel, airline or bank employees);
- (c) **computer hacking**: accessing private and/or confidential data held on computers or mobile phones, including through the use of Trojan software and/or other spyware and malware (which allowed for the interception and access of emails and/or passwords and/or keystrokes and/or other data), and/or theft of hardware (and/or handling of stolen hardware);
- (d) **social media hacking**: accessing private social media accounts (such as Facebook) without proper consent or authorisation, for example as a result of misrepresentation, or by obtaining or “cracking” passwords and/or changing the

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settings);

- (e) **voicemail interception (VMI):** intercepting messages left by, for or about a Claimant on the voicemail facilities of the landline and mobile phones of a Claimant and/or their Associates, including through the use of direct dial mailbox numbers (also called DDNs, DDMs and UVNs) and mobile network mailbox platform numbers;
- (f) **hardwire landline interception:** interception, and/or recording, of landline calls through devices placed on the phone line;
- (g) **analogue interception** of mobile phone calls, or cordless handset landline phones, or walkie-talkie type communications through the use of scanners and other technology
- (h) **digital interception:** the location of individuals' mobile phones and identification of their mobile phone numbers through the use of pinging and/or international mobile subscriber identity (“**IMSI**”) catchers (IMSI-catchers intercept mobile phone traffic and location data of mobile phone users and allow, *inter alia*, a user of an IMSI-catcher to identify the location of the user of a specific phone if it is in range);
- (i) **bin-spinning:** theft of documents from bins or other waste facilities of private residences or businesses, which were intended for disposal;
- (j) **unlawful credit checks:** including the obtaining of current, former, or forwarding addresses and private financial information through the misuse of credit reference agency licences (including, but not limited to, via unlawful access to the Electoral Roll);
- (k) **tracking:** the placing of tracking devices on or in vehicles;
- (l) **bugging:** the placing of covert listening and/or recording devices (“bugs”) on or in premises and vehicles;
- (m) **breaking-in:** the breaking into residences, business premises or vehicles to steal property and/or place bugs;
- (n) **intrusive surveillance:** including by tailing the Claimants for prolonged periods, observation into private residences and/or eavesdropping (in circumstances where the Claimants have a reasonable expectation of privacy and/or the information has the necessary quality of confidence) without a public interest justification; and
- (o) **procuring and/or supplying controlled substances and sex workers:** including providing cash to purported “confidential sources” instructed to attend events (where the Claimants had a reasonable expectation of privacy) and provide drugs and/or sex workers;

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collectively “the **Unlawful Acts**”.

4. The Claimants contend that:
  - (a) certain of the Unlawful Acts set out in paragraph 3 above are likely to represent criminal offences as set out below in paragraph 5;
  - (b) offences are also likely to have been committed by journalists and executives who commissioned the activities, encouraged and/or instructed the commissioning of the activities, approved the commissioning and/or payment, and authorised the payment, because they were aware of the illegal nature of the activities being commissioned and/or paid for. Those journalists and executives, by the actions described, entered into criminal conspiracies to commit the acts complained of, in so far as they knew of the nature of the activities being commissioned and/or paid for; and
  - (c) in relation to the some of the activities listed at paragraph 3(b) (unlawful payments), an offence is likely also to have been committed by the Defendant itself under section 7 of the Bribery Act 2010 (failure of commercial organisations to prevent bribery) in relation to activities commissioned after 1 July 2011.
5. The relevant criminal offences in relation to which the Claimants contend executives and journalists were parties as conspirators or aiders and abettors, counsellors and procurers include:
  - (a) in relation to the activities listed at paragraphs 3(a) (**pretext blagging**), 3(d) (**social media hacking**), 3(j) (**unlawful credit searches**), 3(k) (**unauthorised genealogical database searches**), 3(k) (**tracking**) and 3(l) (**bugging**) offences under:
    - (i) section 55(1) of the Data Protection Act 1998 (“the 1998 Act”), (knowing or reckless disclosure of personal data without consent, in force from 1 March 2000);
    - (ii) before 1 March 2000, section 5(6) of the Data Protection Act 1984 (unlawful obtaining of personal data from a registered data controller, in force from 3 February 1995); and
    - (iii) potentially, section 16 of the Theft Act 1968 (obtaining a pecuniary advantage by deception) and section 2 of the Fraud Act 2006 (fraud by false representation, in force from 16 January 2007);
  - (b) in relation to the activities listed at paragraph 3(j) (**unlawful credit checks**), regulations 94(3) and 115 of the Representation of the People (England and Wales) Regulations 2001 (unauthorised supply, disclosure or use of full copy of full electoral register, in force from 16 October 2002), as amended by the

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Representation of the People (England and Wales) (Amendment) Regulations 2002;

- (c) in relation to the activities listed at paragraphs 3(c) (**computer hacking**) and 3(d) (**social media hacking**), offences under:
    - (i) section 1 of the Computer Misuse Act 1990 (unauthorised access to computer material); and
    - (ii) in circumstances which will be specified, sections 1 (*et subseq*) and 22 (handling of stolen goods) of the Theft Act 1968;
  - (d) in relation to the activities listed at paragraph 3(e) (**VMI**), 3(f) (**hardwire landline interception**), 3(g) (**analogue scanning**) and 3(h) (**digital scanning**) offences under:
    - (i) section 1 of the Regulation of Investigatory Powers Act 2000 (unlawful interception, in force from 2 October 2000); and
    - (ii) before 2 October 2000, section 1 of the Interception of Communications Act 1985 (prohibition on interception);
  - (e) in relation to the some of the activities listed at paragraph 3(b) (unlawful payments) offences:
    - (i) at common law, the encouragement (or aiding and abetting) of misconduct in a public office; and
    - (ii) contrary to section 1 of the Bribery Act 2010 (offences of bribing another person, in force from 1 July 2011);
  - (f) in relation to the activities listed at paragraph 3(i) (**bin-spinning**) and 3(l) (**breaking-in**), sections 1 (*et subseq*) and 22 (handling of stolen goods) of the Theft Act 1968;
  - (g) in relation to the activities listed at paragraph 3(l) (**bugging**), where this occurs as a result of breaking in (i) burglary with intent to cause criminal damage; and/or (ii) section 68 of the Criminal Justice and Public Order Act 1994 (as amended); and
  - (h) in relation to the activities listed at paragraph 3(o) (**procuring and/or supplying controlled substances and sex workers**), section 4(3)(a) of the Misuse of Drugs Act 1971.
6. The Claimants further contend that the following lawful activities were (UIG precursor activities “UPAs”) carried out on behalf of NGN in order to obtain information which was then used by NGN’s journalists and PIs for the purposes of UIG (for example to obtain PINs, answer security questions, access phone messages or blag private and/or confidential information):



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- (a) the obtaining of BMD information;
  - (b) the obtaining of addresses and phone numbers, where obtained from publicly available information sources such as Companies House and the Electoral Register; and
  - (c) the obtaining of information contained at publicly available information sources, including Companies House and the Electoral Register.
7. The Claimants contend that the following PIs including under the names of their aliases, engaged in unlawful information gathering (“UIG”), or alternatively lawful activity that was directly associated with UIG on behalf of NGN.

### **Private Investigators and blaggers – Categories 1(a) and 1(b)**

In relation to the following entities, save where stated otherwise, the Claimants contend that all the activities commissioned by NGN were unlawful, and the Claimants will seek a finding that there should be a presumption that any payment made by NGN was for unlawful activity. The Claimants further contend in relation to the following entities that (a) NGN was aware the activity carried out was unlawful, and (b), save where stated, the activities were those described in paragraph 3(a) herein:

- 7.1 **Active Investigations Services (“AIS”)** and its aliases and sub-contractors (including Gavin Burrows), where the Claimants contend that their activities included those at 3(a), (b), (c), (e), (f), (j) and (n);
- 7.2 **Rob Palmer, Avalon Enquiry Bureau** and other aliases;
- 7.3 **Rachel Barry** where the Claimants contend that, other than for the searches (UPAs) described in paragraph 4 (on which the Claimants rely in relation to this PI), the majority of her activities were unlawful;
- 7.4 **Gavin Burrows** (aka **Gavin Rhodes**), his companies (including **Hawkins/Hawking Rhodes, Hawkins/Hawking International, Rhodes Associates, IIG Europe, Assured Legal Investigations (ALI) Ltd, Iberian Alliance Corporation**), and his aliases and sub-contractors, where the Claimants contend that their activities included those listed at 3(a), (b), (c), (e), (f), (j), (k), (l), and (n);
- 7.5 **Ray Chapman** and aliases, where the Claimants contend that a substantial number of their activities were unlawful and included those listed at 3(a) and 3(b);
- 7.6 **Christine Hart (Warner Detective Agency, Warner News, Warner Security Service)**;
- 7.7 **Lloyd Hart** and **Suzie Mallis** through the sequential companies **TDI (Trace**

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**Direct International), ELI (Express Locate International) and BDI;**

- 7.8 **Mark Hinchcliffe (MSH);**
- 7.9 **JJ Services (Steve Whittamore),** and his network of sub-contractors, where the Claimants contend that the majority of their activities were unlawful and included those listed at 3(a), (b), and (j);
- 7.10 **Kenrick Associates,** run by **George Rickman** and **Laurie Kenny** with **Sid/Steve Creasey,** where the Claimants contend that most of their activities were unlawful and included those listed at 3(a), (b), and (o);
- 7.11 **Andy Lovelace** who the Claimants contend carried out the unlawful activities listed at paragraph 3(f);
- 7.12 **Greg Miskiw (Miles Ahead Media),** in 2005-6 (on his own or via Mercury Press), sold tips and stories based on, or were commissioned to obtain private information through, the unlawful activities of Glenn Mulcaire (qv) where the Claimants further contend that:
- (a) the majority of their activities (save for BMD and company director searches, where the Claimants rely on paragraph 4 herein) were unlawful;
  - (b) the activities included those listed at paragraph 3 (a) (b) (e), (h) and (j);  
and
  - (c) NGN, through Mr Webster and Mr Dudman who bought or commissioned the activity, knew the source of the story;
- 7.13 **Legal Resource and Intelligence Research (LRI),** and its aliases and sub-contractors run by **John Boyall,** and where Glenn Mulcaire worked between 1996 and 2001, where the Claimants contend that their activities included those listed at paragraph 3(a), (b), (e) and (j);
- 7.14 **Metshield (Steve Clarke)** where the Claimants contend that the majority of their activities were unlawful and included those listed at paragraph 3(a) and 3(g);
- 7.15 **Glenn Mulcaire** and his aliases where the Claimants contend that his activities included those listed at paragraph 3(a), (b), (e), (h) and (j);
- 7.16 **PCS Associates** (run by **Philip Campbell Smith - aka Rob Lewis**) where the Claimants contend that their activities and included those listed at paragraph 3(a) and (c);
- 7.17 **Pearmac** (later known as **AML Solutions,** run by **Alan McInerney** and **Ray Pearson**);

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- 7.18 **Research Associates** (and aliases), run by **Paul Hawkes** and **Martin Tomlins-Young**, where the Claimants contend that the majority of their activities were unlawful and included those listed at paragraph 3(a), (b), (c) and (j);
- 7.19 **Severnside/7side**, through a London office staffed by **Taff Jones** and **Steve Hinton**, in the period 1995 – 1999, where the Claimants contend that the majority of their activities were unlawful and included those listed at paragraph 3(a) and 3(b);
- 7.20 **Southern Investigations** (run by **Jonathan Rees** and **Sid Fillery**) including their companies, sub-contractors (who included John Ross) and other aliases where the Claimants contend that all of their activities (save for land registry searches) were unlawful and included those listed at paragraph 3(a), (b), (c), (e), (f), (g), (h) (j), (k), (l), (m) and (n);
- 7.21 **Jonathan Stafford** (and **Newsreel** from 2006);
- 7.22 **Starbase** (“**Secret Steve**”, **Steve Hampton**) where the Claimants contend that the majority of their activities were unlawful and included those listed at paragraph 3(a) and at 3(e);
- 7.23 **Trackers** (**Andy Gadd**); and
- 7.24 The **Wells Blogger** whose name is set out in the Confidential Schedule hereto, where the Claimants contend that their activities included those listed at paragraph 3(a) and (b).

The following PIs were based in foreign jurisdictions:

- 7.25 **Capitol** (run by **Ken Cummins**) (based in the US), where (if necessary) the Claimants will contend that all their activities were unlawful and included unlawful access to databases;
- 7.26 **Dan** (“**Detective Danno**”) **Hanks** (also known as **Daniel Portley Hanks**) of **Backstreet Investigations, British American News Service, Investigators Support Services** (based in the US), where (if necessary) the Claimants will contend that all their activities were unlawful, and included unlawful access to databases;
- 7.27 **Susan McCoppin** (based in the US), where (if necessary) the Claimants will contend that work commissioned by NGN, was unlawful including those activities listed at paragraph 3(a);
- 7.28 **Ann/Annie Johnston** (based in Scotland) where (if necessary) the Claimants will contend that work commissioned by NGN, was unlawful including those activities listed at paragraph 3(a);

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- 7.29 **Sam Fairchild** (based in Scotland) where (if necessary) the Claimants will contend that work commissioned by NGN, was unlawful including those activities listed at paragraph 3(a);

The Claimants contend that the following entities are private investigators based in foreign jurisdictions, where greater particularisation will follow pending further disclosure:

- 7.30 **ABC Investigations, Scott Rankin**; Patrick Cleary (based in Ireland), where (if necessary) the Claimants will contend that work commissioned by NGN, was unlawful including those activities listed at paragraph 3(a);
- 7.31 **Michael Renger** (based in Austria), where (if necessary) the Claimants will contend that work commissioned by NGN, was unlawful including those activities listed at paragraph 3(a); and
- 7.32 **National Investigations Services** (based in Canada).

### **Bin-spinners - Category 1(c)**

- 7.33 **Benji Pell (Langley Management Services, Wilde & Partners)** where the Claimants contend that all of freelance tips and stories offered, were from UIG including those listed at 3(i).

### **Tracers and Search Agents – Category 1(d)**

Unless otherwise stated, the Claimants do not contend that the following entities carried out unlawful activities but carried out UPAs; paragraph 4 above is repeated:

- 7.34 **Ashcroft Cameron Information Ltd**;
- 7.35 **Paul Hardaker** where the Claimants contend that, other than for the searches (UPAs) described in paragraph 4 above, the majority of their activities were unlawful, that this was known to NGN, and such activities included those listed at paragraph 3(d) and (j) above;
- 7.36 **Instant Search (Anthony Capstick)**;
- 7.37 **Andy Kyle (AJK Ltd)** where the Claimants contend that, other than for the searches (UPAs) described in paragraph 4 above, the majority of their activities were unlawful, that this was known to NGN, and included those listed at paragraph 3(j) above;
- 7.38 **Malcolm and Jackie Scott** (of **System Searches**, also known as **Commercial & Legal Services Ltd**) where the Claimants contend that, other than for the UPAs described in paragraph 4 above, the majority of their activities were unlawful, that

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this was known to NGN, and included those listed at paragraph 3(j) above;

- 7.39 **Searchline (Gwen Richardson)** where the Claimants contend that, other than for the UPAs described in paragraph 4 above, the majority of their activities were unlawful, that this was known to NGN, and included those listed at paragraph 3(a), and 3(j) above;
- 7.40 **Sevenside** (through their main office, and excluding the activities pleaded at paragraph 5.24 above);
- 7.41 **Ian Withers (First Priority Investigations, First Priority International, London Scottish Invoice Finance Ltd)** where the Claimants contend that, other than for the searches (UPAs) described in paragraph 4 above, the majority of their activities were unlawful, that this was known to NGN, and included those listed at paragraph 3(j) above; and
- 7.42 **David Woodward**, his companies **JS3 (Journalist Support Services Scotland)**, and **Tyler Williams**, and his aliases where the Claimants contend that, other than for the searches (UPAs) described in paragraph 4 above, the majority of their activities were unlawful, that this was known to NGN, and included those listed at paragraph 3(j) above.

### **Genealogists - Category 1(d)**

In relation to the activities of the following entities, the Claimants contend they carried out the UPAs set out at paragraphs 4 above:

- 7.43 **Tony Bassett**;
- 7.44 **Census Searches (John/Charles & Mary Kerr, The Lord and Lady Teviot)**;
- 7.45 **First Scottish Searching Services**;
- 7.46 **John and Elaine Hitchcock**; and
- 7.47 **Roy Stockdill**.

### **Freelance journalists - Category 1(e)**

In relation to the activities of the following entities, the Claimants contend that a limited number of tips and stories offered derived from and/or some of the work commissioned by NGN involved, UIG (or the use of PIs for UIG) and will further contend that in such cases the UIG was known to NGN, and that the UIG included those activities listed at paragraph 3(a) above (the Claimants will specify such tips/commissions when relying upon this contention):

- 7.48 **Peter Allen** (based in Paris);

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- 7.49 **Mike Behr** (based in South Africa), and the **Zero Foundation**;
- 7.50 **Matt Bell (Ferrari Press Agency)**;
- 7.51 **Nigel Bowden** (based in Spain);
- 7.52 **Martin Coutts**;
- 7.53 **Lee Harpin** where the Claimants contend that his UIG included the activities listed at 3(a) and (b) above;
- 7.54 **Ray Levine**;
- 7.55 **London Media Press (Andy Buckwell & Rick Hewett)**;
- 7.56 **Alex Marunchak**;
- 7.57 **Sean O'Brien**, including as **Austen O'Brien (AOB) PR**;
- 7.58 **Jenny/Jen Paul (Showbisnews)**, based in France);
- 7.59 **Nick Pisa** (based in Italy);
- 7.60 **Phil Ramey** (based in the US);
- 7.61 **David Schumacher**, (based in the US);
- 7.62 **Ian Sparks** (based in France);
- 7.63 **Amanda Stocks (Exclusive PR)**, and her aliases;
- 7.64 **TAG News Media** run by **Gerard Couzens** and **Tom Worden**, and also paid as **Gerard Couzens Media** and **Natalia Penza** (based in Spain);
- 7.65 **Chris Tate**;
- 7.66 **Paul Thompson (Newsflash USA)**, based in the USA);
- 7.67 **Frank Thorne (Boomerang Media)**, based in Australia); and
- 7.68 **Annette Witheridge (Big Apple News)**, based in the US).

### **Professional Tipsters – Category 1(f)**

In relation to the activities of the following entities, the Claimants contend that many of freelance tips and stories offered derived from, and/or some of the work commissioned by

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NGN involved UIG (or the use of PIs for UIG) and will further contend that the UIG was known to NGN, and that the UIG included those activities listed at 3(a) above (the Claimants will specify such tips/commissions when relying upon this contention):

7.69 **Paul Samrai (Topstories Ltd and Inderjit Samrai); and**

7.70 **Ron Sutton (Kanta Banga).**

In relation to the activities of the following entity, the Claimants contend that all of the freelance tips and stories offered derived from and/or work commissioned by NGN involved UIG (or the use of PIs for UIG) and will further contend that the UIG was known to NGN, and that the UIG included those activities listed at 3(a) (m) and (n) above (the Claimants will specify such tips/commissions when relying upon this contention):

7.71 **Marc/Mark Moon, Colin Moon and Public Players;**

In relation to the activities of the following entities, the Claimants contend that a limited number of freelance tips and stories offered derived from, and/or some of the work commissioned by NGN involved, UIG (or the use of PIs for UIG) and will further contend that the UIG was known to NGN, and that the UIG included those activities listed at 3(a) above (the Claimants will specify such tips/commissions when relying upon this contention):

7.72 **Central European News (Michael Leidig, based in Austria);**

7.73 **Les Chudzicki/Chudziki** whose activities included those listed at 3(a) and 3(m) above;

7.74 **Simon Lloyd** whose activities included those listed at 3(a), 3(i) and 3(o) above;

7.75 **Nigel Rosser (Rosser Media/Rosser Communications); and**

7.76 **Mark Thomas (TM Media).**

### **Unlawful Police & Public Official Tipsters – Category 1(g)**

7.77 The Claimants contend that the following carried out the activities described in paragraphs 3(a) and (b) above:

(a) **John Ross**, where all the tips and stories offered to NGN derived from UIG and/or all of the work commissioned by NGN involved UIG, involved the activity described in paragraph 3(b) above (and specifically included improper payments to police officers), and further contend that this activity was known to NGN; and

(b) **Southern Investigations, JJ Services and Active Investigation Services**, which included requests for private information held on the Police National Computer through improper payments made by these PIs (directly through their networks of sub-contractors) to serving police officers and further contend that this activity was known to NGN.

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7.78 The following police or public officials (or their aliases or alternative payees) supplied and/or sold private and/or confidential information to NGN journalists as described in paragraph 3(b) above, that NGN were aware of this, and that this was carried out by individuals such as:

7.78.1 **Tracy/Tracey Bell/Banyard;**

7.78.2 **Paul Brunt;**

7.78.3 **Timothy Edwards & Leah Edwards;**

7.78.4 **Richard Farmer (“George Alfred”)** who the Claimants contend sold confidential police information to Neville Thurlbeck at the *News of the World*;

7.78.5 **Paul Flattley (“Paul Jackson”);**

7.78.6 **John Hardy & Claire Hardy;**

7.78.7 **Bettina Jordan-Barber;**

7.78.8 **Simon Quinn;**

7.78.9 **Neil Wallis** (from 2009 when working for the MPS); and

7.78.10 **other police officers and public officials** who were publicly named in connection with allegations of supplying NGN with private information obtained during the course of their official duties for payments which were made public during police investigations between 2011 and 2015.

7.79 The following police officers (including those suspended or recently retired) or public officials, or their aliases or alternative payees, who supplied private information to NGN, directly or via Private Investigators:

7.79.1 **Nigel Grayson/Grayston** (later of **Bridge Security**);

7.79.2 **Duncan Hanrahan** (of **Hanrahan Associates**, run with **Martin King**); and

7.79.3 **Alec Leighton** (**Mayfayre Associates, Mayfayre Security Services Ltd, Charterhouse Investigations**);



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### **Professional Tipsters – Category 1(h)**

7.80 **Emma Bertenshaw** who the Claimants contend supplied NGN journalists with private information about individuals making home purchases as described in paragraph 1(h) above.

### **Photographers – Category 1(i)**

In relation to the activities of the following entities, the Claimants contend that, they used UIG (including via private investigators) including that listed at 3(a) above in order to secure certain exclusive pictures, save where stated otherwise and that in these cases (which the Claimants will specify if relying upon such a case) NGN was aware they had been sourced unlawfully:

7.81 **Big Pictures (Darryn Lyons, Mr Paparazzi);**

7.82 **Greg Brennan;**

7.83 **Coleman Rayner (Mark Coleman & Jeff Rayner, based in the US);**

7.84 **Cruise Pictures (Robin Kennedy & Lee Brooks)** where the Claimants further contend that, the PIs used included such as **Gavin Burrows** and involved the activities listed at 3(a), (e), (f), (j), (m), (n) and (o) above;

7.85 **Jason Fraser of Fraser Woodward;**

7.86 **Glenn Harvey and Mark Saunders;**

7.87 **IKON Pictures (Niraj Tanna, Chandni Tanna and Jesal Parshotam)** where the Claimants further contend that the UIG used including that listed at 3(a) and 3(h) above;

7.88 **Noble Draper (James Noble and Paul Draper);**

7.89 **David Parker** who the Claimants further contend used UIG such as that listed at paragraph 3(a) above (including blagging, unlawful access to computers or corrupt payments to airline employees) to provide tips about, and to secure certain exclusive pictures of, airline passengers;

7.90 **Scott Tillen** (latterly of **Unique Pictures**), **Andy Tyndall** (until 1998) and **Spencer Dove** (from 1997, latterly of **Lenslife**), working in combination and known herein as “**Tillen, Tyndall & Dove**” where the Claimants further contend that the UIG (including when having been commissioned by NGN to use such UIG) included that listed at 3(a), (e), (h), (l) and (n) above; and

7.91 **Splash News.**

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### **Intrusive Surveillance – Category 1(j) and 1(k)**

In relation to the activities of the following entities, the Claimants contend that the targets for their surveillance were sourced and located via UIG, including that set out at 3(a) and (e) above, carried out by others which was known to NGN, and they were a supplier described in paragraph 1(k)(1) above:

7.92 **Justin Nestola (JJN Electronics, Spytechnology);**

7.93 **Mercedes Rodriguez;**

7.94 **NMA; and**

7.95 **Oztex (Allan Harredan).**

In relation to the activities of the following entities, the Claimants contend that the targets for their surveillance were sourced and located via UIG, including that set out at 3(a) and (e) above, carried out by others, and where they provided services set out in paragraph 3(n) above and were suppliers of the type described in paragraph 1(k)(1) above.

7.96 **Bradley Page;**

7.97 **Burgess PDQ (Steve McLaughlin);**

7.98 **Conrad Brown, (Conrad Brown Surveillance Services)** where the Claimants further contend that he was supplier of the type described in paragraph 1(k)(2) above; and

7.99 **Gerry Brown (“Specialist Reporting”)**, where the Claimants further contend that he provided services set out in paragraph 3(g) above.

In relation to the activities of the following entities, the Claimants contend that the targets for their surveillance were sourced and located via UIG, including that set out at 3(a) and (e) above, carried out by others, and where they provided services set out in paragraph 3(o) above:

7.100 **Phil Cook;**

7.101 **Covert Security Solutions (CSS, Steve Adams);**

7.102 **Covert Surveillance & Investigation Services (CSI, Martin Nymark);**

7.103 **Derek Webb (Silent Shadow Services, Kevin Webb); and**

7.104 others such as **Simon Lloyd and Tillen, Tyndall & Dove.**

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### **Entities involved in Break-ins – Category 1(k)**

In relation to the activities of the following entities, the Claimants contend, save where stated, that they were commissioned by NGN to carry out unlawful activities listed at 3(n) above:

7.105 **Ray Nobbs** (and alternative payee **Christine Nobbs**) who the Claimants further contend carried out the unlawful activities listed at paragraph 3(l) above;

7.106 **Simon Bukowitz/Burkowitz/Berkowitz** who the Claimants further contend also sold tips and stories based on the product of UIG and of which NGN was aware of the source of the material; and

7.107 **Tim Bomberg** and **Alex Bomberg** (of **International Intelligence**).

### **Mahmood Associates – Category 1(m)**

In relation to the following entities, the Claimants contend they assisted Mr Mahmood while he carried out his unlawful activities and, pending full disclosure, the Claimants will specify where they contend that it was for unlawful activity when seeking to rely on any payment, and where further particularisation is pending further disclosure:

7.108 **Kishan Athulathmudali** (aka Alex D’Souza, Alex De Mel, Sanjay DeSava, Sanjay De Silva, Marcus De Silva) (from 2001) who was employed by NGN at the *News of the World* from around 2004;

7.109 **Alan Breeze**;

7.110 **Tommy Bryant**;

7.111 **Patrick Bryan**;

7.112 **Steve Burton**;

7.113 **Cherie Dowd**;

7.114 **Florin/Florim Gashi** (also paid as “**Artan**” and via his girlfriend **Dominique Morris**);

7.115 **Melvyn Heraty**, who was an operative hired from Southern Investigations and paid by NGN;

7.116 **Steve Grayson** (to 1997) who was an investigative photographer;

7.117 **Sarah Issitt** (1996 to 1998), who also worked as a contributions clerk and then News Desk administrator on the *News of the World*;

7.118 **Aseem Kazi**;

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- 7.119 **Nish Kermalli;**
  - 7.120 **Naresh Kumar;**
  - 7.121 **Akbar Ali Malik;**
  - 7.122 **Marwan**, who was used by Mr Mahmood when Mr Mahmood needed an Arabic-speaking sheikh;
  - 7.123 **Sharmaine May;**
  - 7.124 **Lennie McClean;**
  - 7.125 **John Miller;**
  - 7.126 **Mintra Web Design;**
  - 7.127 **Mehmood (“Jaws”) Qureshi/Quereshi;**
  - 7.128 **Alan Smith** (and alternative payee **Miss SJ Reeves**);
  - 7.129 **Brian Tough;**
  - 7.130 **Gary Vian**, who was an operative hired from Southern Investigations, and a suspect in the Daniel Morgan inquiry;
  - 7.131 **Glenn Vian**, an operative hired from Southern Investigations, and a suspect in the Daniel Morgan inquiry;
  - 7.132 **“Zee”**, a girl friend of Mr Mahmood; and
  - 7.133 various unidentified corrupt police officers, as admitted by Mr Mahmood.
8. Pending further disclosure, other PIs known (or where there are reasonable grounds to suspect) to have been engaged by NGN to carry out some of activities at paragraph 3 (above):
- 8.1 **Barry Beardall;**
  - 8.2 **Mickey Boddy;**
  - 8.3 **Brookmans International (Daniel Summers and Graham Freeman);**
  - 8.4 **Peter Farrington (Farrington Legal Services);**

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- 8.5 **Global Intelligence Services Ltd (Adam/John Spears);**
- 8.6 **Code Ten (Christopher Hackett, Michael Dilks and Darren Whalley);**
- 8.7 **Keith Hunter and Nigel Brown (ISC Global, RISC Management);**
- 8.8 **Linx International;**
- 8.9 **Gary Lowe (Chimera Agency, Premier Agency);**
- 8.10 **Michael Macdonald Murray;**
- 8.11 **No Hiding Place (Phil Winton/Catt);**
- 8.12 **Planet 111 (Planet One-Eleven); and**
- 8.13 **Gavin Singfield.**