



Solicitor to the Leveson Inquiry  
The Leveson Inquiry  
Royal Courts of Justice  
Strand  
London  
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**By email**

Our ref:

16 November 2012

Dear Sirs

**Statements to be read**

We write regarding the further list of statements to be read, as circulated by the Inquiry on 7 November 2012. We reiterate the points we have made previously on ANL's behalf in relation to evidence being read into the Inquiry in this way (see, amongst others, our letter of 6 November 2012).

The Inquiry has, however, specifically referred ANL to a witness statement by Cherie Blair dated 29 October 2012 and so we are instructed to provide a brief response to the claims Ms Blair has made, albeit at such a late stage in the Inquiry process.

Ms Blair's statement is said to be a response to parts of the fourth witness statement of Liz Hartley, head of editorial legal services at ANL. Here Ms Hartley set out ANL's response to various claims by Tony Blair in his evidence to the Inquiry on 28 May 2012 that:

1. ANL had a personal vendetta against Cherie Blair and "attacked" her and her children.

In summary, Ms Hartley's evidence was that there was no such vendetta and there were no such attacks. The (obvious) reason why ANL's titles published many stories about the Blairs is that Mr Blair was Prime Minister for over 10 years. His family and the activities of his wife in particular, who chose to adopt an unusually prominent public and political profile, were part of the narrative of his political career and have continuing relevance, though ANL has taken care not to intrude on Mr Blair or his family's private life without proper justification.

2. Solicitors acting on behalf of Ms Blair wrote letters before action to ANL or issued legal proceeding against ANL on more than 30 different occasions between mid-2006 and November 2011. This volume of legal complaints indicated a pattern of wrong doing by ANL.

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Again in summary, Ms Hartley's response was that ANL's records show that of the 30 or so letters sent by Ms Blair's lawyers during the five year period from mid-2006 to November 2011, only two resulted in legal proceedings (one of which was dropped). Around half of her complaints had no merit whatsoever and many of the remainder were trivial and inconsequential. Mr Blair's characterisation of the 30 "legal interventions" created an utterly misleading impression of the nature of those complaints. Indeed, considering the number of stories about the Blairs published during that five year period, the number of meaningful complaints from them is relatively low. There was no "pattern of wrong doing" by ANL.

In her response, Ms Blair has sought to challenge Ms Hartley's evidence by essentially repeating the claims her husband made. She has alleged that:

1. ANL has shown "a disproportionate and hostile approach to her and her family"
2. the rights to privacy of her children were "frequently disregarded"
3. "defamatory allegations were published about her and her family"
4. this "amounted to a targeted campaign" against her and her family.

As evidential support for her and her husband's claims, Ms Blair has exhibited a collection of letters and materials to her witness statement. Having reviewed these materials, it is clear that they do not affect the analysis of the Blairs' allegations set out in Ms Hartley's fourth witness statement (namely that they are unfounded). This is particularly the case given the fact that, of the materials Ms Blair has provided:

1. a number appear to be draft letters which we do not believe were ever sent.
2. a number of the letters provided are duplicates or relate to the same complaint.
3. a significant number do not appear to relate to members of the Blair family in any event. See, for example:

- a. Various letters from the Brahma Kumaris World Spiritual University
- b. A letter regarding Carole Caplin
- c. A letter relating to Paul Costelloe
- d. A letter from Nicholas Daubeny

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In short, to the extent that the evidence Ms Blair has provided even relates to ANL and its dealings with the Blair family, none of it provides any valid basis to challenge what is said about these matters in Ms Hartley's fourth witness statement. The position remains as set out in that witness statement: Mr and Mrs Blair's claims about ANL's treatment of them and their family are unfounded.

Bearing in mind the stage we are at in the Inquiry process and the confusions in the materials provided by Ms Blair, it does not seem proportionate for ANL to incur the costs of preparing a detailed response to her claims. That said, if the Inquiry is intending to rely on this statement in any way and it can explain how a request to provide a detailed response to the statement would comply with s.17(3) of the Inquiries Act 2005, ANL can assist further.

Yours faithfully



**RPC**