

**THE LEVESON INQUIRY INTO THE CULTURES, PRACTICES
AND ETHICS OF THE PRESS**

WITNESS STATEMENT OF JAMES HANNING

I, **JAMES HANNING** of Independent Print Limited, 2 Derry Street, London, W8 5HF, WILL SAY;

My name is James Hanning. I am deputy editor of the Independent on Sunday and, with Francis Elliott of The Times, co-author of a biography of David Cameron.

In the course of co-writing and updating our book we spoke to a large number of people, but equally I am very conscious that I, at least, dipped into areas in which I can claim very little specialist knowledge, so I would emphasise that in several respects there are a great many people better placed to comment and much of what follows is impressionistic.

I hope that what follows is germane to some of the relationships that Lord Justice Leveson has asked witnesses to discuss. I hesitate to try to draw a broader picture, but I hope that some conclusions about the disproportionate influence of a particular sector of the media can be drawn from my experience.

My interest in the area under discussion in the Third Module stems from two topics. One is in David Cameron, on whose biography we began work in late 2005, soon after Cameron became Tory leader. The second is an interest in phone hacking at the News of the World.

Tory relations with Murdoch

Since early 2007, the Conservative leadership has been extremely keen to ingratiate itself with the Murdoch empire. It is striking how it had become axiomatic that the support of the Murdoch papers was essential for winning a general election. Whether the support of the Murdoch papers actually wins elections or whether he's merely very successful at backing winners, at delaying announcing his allegiance until he knows who will win, I don't know, but it's not a debate politicians seem to want to leave to chance. George Osborne was particularly keen to follow what might be called 'the Tony Blair playbook' as he saw in it the recipe for electoral success.

But that had not always been the Tory strategy. After David Cameron took over the Conservative leadership at the end of 2005, he and his colleagues decided to adopt an arms'-length approach to

newspapers. The belief existed that newspapers had had their day as opinion-leaders and deciders of voting behaviour and that they were not going to chase newspaper magnates any more.

This may have been in part because Associated and the Telegraph groups almost always support the Tories in any event, and partly because Rupert Murdoch had a good relationship with Tony Blair and Gordon Brown and was known to be sceptical about Cameron personally, so maybe there wasn't that much to be gained by courting Murdoch. I remember one senior aide saying privately: "We don't need (expletive) Murdoch."

During 2006 there followed a series of radical speeches which did not go down well with either the columnists or the Tory backbenches. One of them may have been 'Hug a hoodie'. There was concern that the incoming leader Gordon Brown was much admired by Rupert Murdoch, and that he might call a snap election on reaching Downing Street. One political associate said Cameron was worried that he might lose the Tory leadership by Christmas. As a result of this "major wobble" the Tory leadership lost its nerve. There was a major volte-face and it was decided to ditch the arms' length strategy and, as they had in other respects, adopt the strategy of Tony Blair. It was full steam ahead to get Murdoch's support.

That switch took place at about the time that Andy Coulson resigned from the editorship of the News of the World. His availability dovetailed so well with the end of the 'arms-length' experiment that on occasions I've been tempted to think it catalysed the switch.

It was known that Cameron's then press person, George Eustice, was wanting his own parliamentary seat and that David Cameron wanted what they called a 'heavy-hitter'. They spoke to a large number of people about the job, but none had seemed to fit the bill. There had been rumours that after a decent interval Coulson might be allowed back into the Murdoch fold, but for him to go to work alongside the leader of the opposition was remarkable.

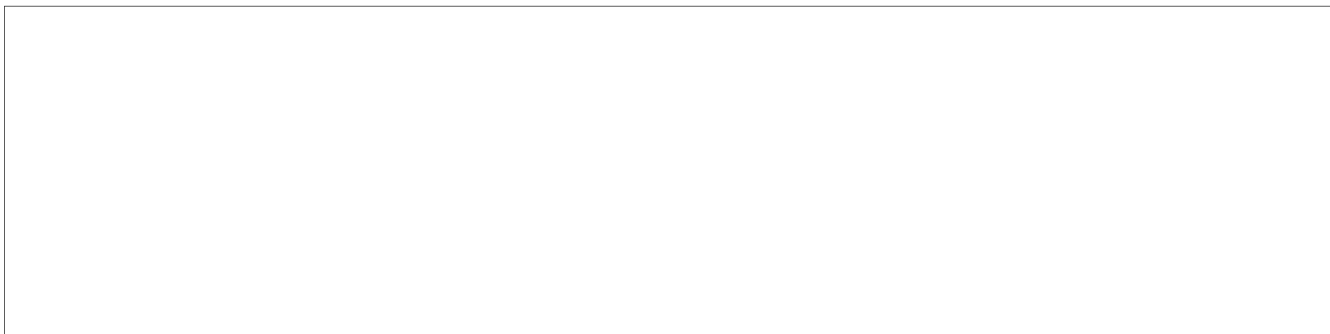
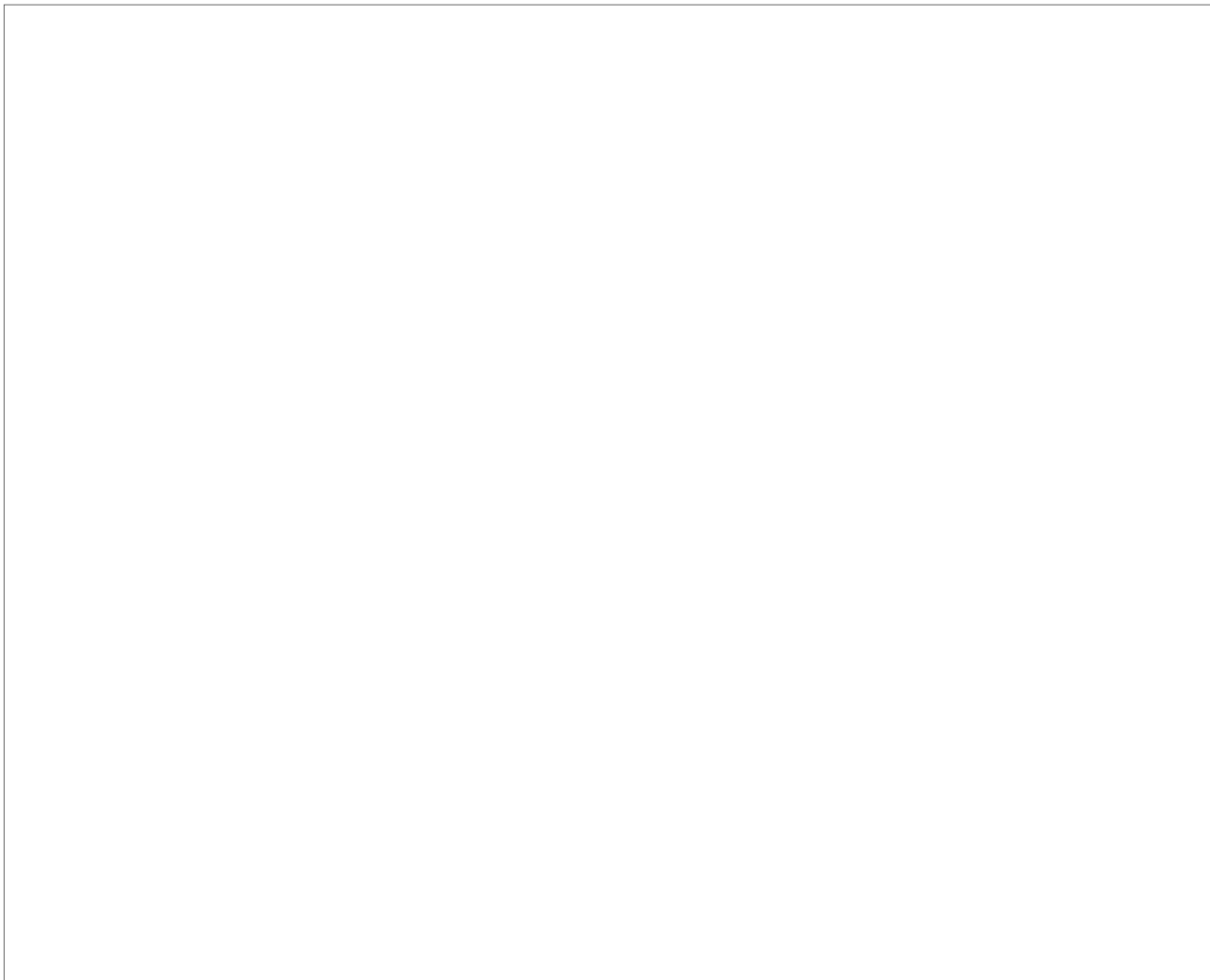
The Mail on Sunday carried a story last year (see appendix) which said that it was Rebekah Brooks who had proposed Coulson for the job, an idea which had George Osborne's enthusiastic support. She has denied this.

The Tories were very keen to have him, partly because he was a highly professional, tough-minded journalist (the comparison with Alistair Campbell was obvious) and partly because he was seemingly so well in with Murdoch. I'm told, but can't prove, that his job description was to help Rebekah Brooks, Matthew Freud and James Murdoch persuade Rupert Murdoch to back the Tories in the next election.

I didn't know it at the time, but have recently learned that a number of people advised Cameron's office, at least, against hiring Coulson. Among journalists, there was a degree of scuttlebutt suggesting the entire story had not been heard, but there was no concrete evidence. One person I spoke to said the very fact of having edited the News of the World meant an editor would have done things that would disqualify him from holding such high office. I was struck by the chutzpah of those who believed that someone could work so closely with the leader of the Opposition without any need to answer even the most basic question about his recent past. Yet they seemed to be vindicated, in that the press showed little interest.

Due diligence

One issue that has grown in salience in the last five years is the issue of whether there was due diligence done over the appointment of Andy Coulson. In the course of updating our biography, we sought to investigate the matter, and the outline of our findings can be found below. But a brief retelling of my own interest in that topic may be of some additional, if circumstantial, relevance.



I believe a comparatively low-grade check was done on Coulson in 2007, to ascertain that there were no outstanding legal cases. I also gather that it was George Osborne who told the shadow cabinet that Coulson would be joining the team, although with only 'cursory' discussion. It is my belief that David Cameron did not ask Coulson himself at the time of Coulson's hiring what he had known. "He didn't want an awkward conversation with Andy," I was told, and Cameron left the matter in the hands of George Osborne, who had been very keen on the appointment.

It has been mooted that Osborne was keen for Coulson to be hired (apart from his knowledge of the media and his Murdoch pedigree) because of some arrangement he and Coulson had come to over pictures that appeared of him in the News of the World at a dinner table with a 'dominatrix'. One suggestion is that for some reason Coulson 'went easy' on Osborne in his handling of the story and consequently Osborne felt he 'owed' Coulson. I have not been able to establish if there is anything in this, or in any of the even more fanciful stories. My suspicion is simply that Osborne had liked him. It is true that the News of the World had sat on the story for a matter of months and, I would say, that the News of the World version of the story was more sympathetic to Osborne than the Sunday Mirror's, but to my mind both could have perfectly innocent explanations. All I would say is that in the context of the hiring of Andy Coulson, nobody emerges looking entirely like Caesar's wife was meant to look.

I have been unable to establish what conversation Osborne had with Coulson over whether he knew about the phone hacking, but am told, reliably I think, that Cameron was privately “furious” with Osborne. To my mind, Cameron’s assertions in the Commons in July 2011 suggest a man who is a) accepting his constitutional responsibilities but b) protesting too much (when he spoke of the decision to employ Coulson being his) in covering for his friend the Chancellor, perception of whose sound judgment was vital to the government’s success. When Cameron spoke of having been personally assured by Coulson that he had not known about the phone hacking, my strong impression is that he was talking about after he had taken him onto his staff. I do not know what Coulson told Osborne when/if Osborne asked him.

The PM’s social relations with the Murdoch empire.

In the course of looking at Cameron’s constituency life, a picture began to emerge of a group of powerful, wealthy individuals, key players in the Murdoch clan, who lived near Chipping Norton in the Cotswolds. These included Matthew Freud and his wife Elizabeth Murdoch, and Rebekah Brooks.

This would have been of little interest beyond the gossip pages had there not been a) an election in the offing and b) a large bid (announced after the election) to buy the part of BSKYB that News Corp didn’t already own. The Ministerial Code says that: Ministers must ensure that no conflict arises, or could reasonably be perceived to arise, between their public duties and their private interests. Even to someone with no specialist knowledge of media regulation, there seemed to be potential for at least a perceived conflict of interest. Gordon Brown’s evidence in the House of Commons in the summer of 2011 on the similarities between Conservative media policy and what NI had been advocating was striking.

I remember one guest who had seen David and Samantha Cameron a certain amount over the course of one weekend expressing, with a surprise that verged on indignation: “They do see an awful lot of Rebekah (Brooks)” On closer examination, it turned out that they were meeting frequently, at lunch parties, informal supper gatherings, barbecues and so on, despite the fact that there was this huge business deal being considered.

My own view is – and he has said this - that David Cameron would have gone out of his way not to push that deal personally but nonetheless I am unable to explain how Cameron let his guard drop so markedly. It may be worth noting that in 1997-8, at a comparable stage in their rule, Labour made comparable errors (Hinduja, Formula 1), taking their own good faith and integrity for granted when a dose of “we’ll be the judge of that” from the media or the public might have been in order.

But while I suspect he was not guilty of anything that most people would regard as corrupt over media regulation, he seems to have been quite aware that it would have looked bad had people known how much he was seeing of Murdoch’s people, and went to some lengths to obscure the fact. I understand for example that he and Rebekah Brooks would text one another to avoid being seen arriving at a party or a point-to-point at the same time. The desire not to be seen together was multiplied after July 2011. This has been written about by Kelvin MacKenzie (see appendix).

In 2008 Matthew Freud, Rupert Murdoch’s son-in-law, flew Cameron and his family to stay on Rupert Murdoch’s boat in the Mediterranean. This was evidently part of the strategy of some of

the younger people in the Murdoch entourage to 'sell' Cameron to Rupert Murdoch. I know that some of the people around David Cameron – in London - believed his closeness to Matthew Freud might attract unfavourable publicity, but evidently Cameron felt that would be a price worth paying. In fact, the publicity was short-lived, and Matthew Freud's influence went back to being less high-profile.

In the course of preparing our book, we heard a number of stories. Some we were able to substantiate, others were simply untrue. Others still would not have been provable to the satisfaction of a libel lawyer. It would be invidious to take advantage of the privilege offered by this inquiry to make unproven allegations. Equally, it would be remiss not to flag up the fact that they were stories of the sort that would invite yet more concern about the PM and his wife's relationship with a powerful media group.

Journalists can be adept at learning of somebody's personal foibles and most personal secrets. I would imagine those who work at the News of the World would be as good as any in that respect, although I make no assertions about any individuals. But a public figure would presumably be well advised to remember that the journalist doesn't have to reveal those secrets for the relationship to become awkward (possibly the reverse). I would have thought it's a lesson politicians need to learn fairly early that if you don't want to be called upon, or indeed leaned upon, a certain distance needs to be maintained. In short, do not let your hair down with these people. I have a sense that David and Samantha Cameron have now learned that lesson.

The so-called Chipping Norton set may be something of a media construct, and there has also been much socialising in Notting Hill as well, but the reluctance of the PM to speak frankly about it is revealing. The farcical story of the loaned police horse and an unwillingness to reveal his social engagements bear witness to that evasiveness. George Osborne, too, is extremely friendly with Rebekah Brooks, and until recently he had a mocked-up front page of the Sun, presented to him by her during his 40th birthday party at Dorneywood, on his desk at No 11 Downing Street. The headline reads: "23rd May, 1971, Ozzy was born"

More generally, Labour also had a very close relationship with the Murdoch management. The closeness of Tony Blair and Gordon Brown to Rebekah Brooks was not well publicised, apart from the odd 'sleepover', but was much closer than I suspect any of them would have liked the public to know. I have heard it said that Rebekah Brooks used to cook dinner for Blair in Downing Street on occasions. I have not sought to verify that, but it would not surprise me. It's hardly textbook government/4th estate relations.

The legacy of that relationship, even after the Sun announced it would be backing the Tories in the 2010 election, made it all the harder to persuade Labour politicians to speak out about their experience of having had their private lives invaded. We tried for three weeks to persuade Tessa Jowell's office to confirm that she had been told her phone had been hacked, but they refused to do so. Nonetheless, she received, I believe, £100,000 and her husband £100,000, in compensation from News International. Another cabinet minister came to a similar arrangement, although I understand he was paid considerably more. It is surely unfortunate that the distress caused to those cabinet ministers was not put to at least some constructive purpose, yet the

cabinet secretary advised Gordon Brown, as Prime minister, that there was insufficient evidence to have a public inquiry into phone hacking.

There is an aspect of all this which, as a journalist, I think shows how the public has not been well served by the closeness of the Murdoch empire to the government. One of the reasons printed newspapers are generally struggling is the growth of the internet, much of which is free of charge. Newspapers are nervous about setting up paywalls while there are comparably authoritative websites available free of charge.

I am told, but cannot prove, that David Cameron is (or was) close to being persuaded that the BBC should be made to charge for its website (which, as it happens, News International is in favour of). I gather there is nothing in the BBC's Charter to prevent this. The effect of this, some believe, would be that newspapers would feel free to follow suit and charge (as The Times and the FT do) and – it is argued - it might provide a shot in the arm for “serious” journalism. This seems to me a legitimate area of public discussion, and I think most people would agree that a robustly free press is to be welcomed. In the introduction to the ministerial code, David Cameron wrote that the government should be “transparent about what we do and how we do it. Determined to act in the national interest, above improper influence.” But if the PM was to raise the issue now of the BBC charging for its website, there would probably be a howl of suggestions about improper influence. Or, he could duck the issue entirely, wary of precisely that charge. Either way an important issue – and I declare my interest – is barely on the agenda because of mistrust as to whether a powerful media player might wield more influence than is appropriate.

For possible reference:

Independent.co.uk

July 10, 2011 Sunday 12:00 AM GMT

Rebekah, Dave, and the Chipping Norton set: Where power in Britain lies; The key to the relationship between Britain's most powerful man and woman lies in the Cotswold triangle

BYLINE: By James Hanning and Matthew Bell

SECTION: PRESS

LENGTH: 1467 words

The A361 is a misleading name for the road that links Burford to Chipping Norton, or Chippy, if you're local. It's a pedestrian, train-spotterish name, that gives no indication of its status as the vital artery that courses through the most glamorous heartland of power-brokers outside London.

To the uninformed eye, the grey-green hills north-west of Oxford are unremarkable. American tourists, hungry for Laurie Lee visions of sun-dappled sandstone, hurry through on their way to the Swells and Slaughters further west.

While there's nothing to see from the road, a very different story lurks behind the five-bar gates. "This is a highly sociable part of the world," says one local. "Every weekend there are drinks parties, barbecues, swimming and tennis parties. And in the winter there's shooting and hunting. There's a great mix of people, though it's pretty high octane."

If Cotswold life is notably social, it is also notably powerful. Within a few square miles, the Prime Minister, the most powerful woman in Britain, the most powerful PR man in Britain and the daughter of the world's leading media magnate can all be found. Anyone who wanted to claim that democracies are a sham could do worse than start here.

Neighbours talk of a barbecue a few weeks ago where the alcohol flowed, and David Cameron and Rebekah Brooks are known to be regular visitors at each other's houses, "forever popping round for supper", according to one friend. They are known to have had dinner with each other at least once over Christmas (with James Murdoch), and were seen together at a drinks party in a neighbouring manor house on Boxing Day, in defiance of those who thought the PM should not get too close to representatives of a company seeking to take over BSKyB.

Of big houses, there is no shortage. But in the past decade, the mix of occupants has changed from nobs and bankers to include a mix of celebrities and politicians. When Cameron came to the area 10 years ago, he rented a cottage from Lord Chadlington, the brother of John Gummer, before buying a farmhouse in the hamlet of Dean when he won the seat of Witney. Matthew Freud and Elisabeth Murdoch began renting China Corner from the Duke of Marlborough's Blenheim Palace estate, before buying Burford Priory for £6m three years ago. Rebekah Wade followed suit, renting at Blenheim before moving in with her new husband, Charlie Brooks (part of a long-established Cotswold family and a friend of Cameron's brother, Alex), to his converted barn between Sarsden and Churchill.

Up the A361 near Chippy is Jeremy Clarkson, and west a bit at Kingham are the Bamfords, the JCB millionaires whose Daylesford farm shop serves as a central canteen and parish pump. Blur's bassist, Alex James, is always about, as are Ruby Wax and Kate Moss; then there's Charlie Dunstone, the Carphone Warehouse co-founder, and Emily Oppenheimer Turner, whose family is big in the De Beers diamond mines. Local nobs mopped up in the mix include Lord and Lady Rotherwick, who run a music festival at Cornbury Park, and Josh Astor, whose mother's home Bruern Abbey was bought by the Bamfords for their son.

The question is, how did Cameron and Brooks come to form such a close bond? How did the grammar school girl from Warrington penetrate the Prime Minister's innermost circle, winning

over both him and his wife Sam? And why did he allow himself to be drawn into an alliance with what has proven to be so toxic a brand?

The strength of their bond is rivalled only by that between Brooks and her boss, Rupert Murdoch, who calls her his fifth daughter. He chose to sacrifice a 168-year-old newspaper and the jobs of 200 staff to keep her in post. Those who know Brooks describe her as fun, charming and good company. The same is true of Cameron. She is mischievous and energetic, and they share a clear-eyed ambition, which in her case was focused on journalism from an early age.

Born in Daresby, Cheshire, she announced her intention to become a journalist aged 14. Her mother, Deborah, was horrified and pleaded with her to change her mind. But Wade was determined and, after leaving her grammar school in Warrington, she headed for Paris. What exactly she did there is uncertain: according to her Who's Who entry, she studied at the Sorbonne. Other accounts suggest she used her fluency in French to work on the journal *L'Architecture d'Aujourd'hui*.

What we do know is that she was soon back in Cheshire, working with Eddie Shah's Messenger Group and, later, his newspaper *The Post* before becoming a secretary on the *News of the World's* magazine in London. She was only 20, and quickly rose through the ranks, joining *The Sun* and in 2000, aged 31, becoming the youngest editor of a national newspaper, at the *News of the World*.

It was at around that time that Brooks began spending weekends at China Corner, the cottage in the grounds of Blenheim Palace rented by Matthew Freud and Elisabeth Murdoch. They were married in August 2001 in the Blenheim chapel, with a marquee reception afterwards for only 70 guests. Among them was Rupert Murdoch, Wade and her future husband, the *EastEnders* actor Ross Kemp.

For an ambitious and hard-working couple, it made sense to get a bolthole of their own, and soon Wade and Kemp too were renting a cottage from the Duke of Marlborough. The Duke's 11,500-acre estate would provide the perfect venue for Wade to pursue her interest in riding, while Kemp could often be found nursing a pint at the Feathers hotel in Woodstock.

History is hazy about when Wade first met the Camerons, but by the time David was elected leader of the Conservatives in 2005, a friendship had been born. It helped that they were neighbours, and that they shared a passion for tennis and riding. But their friendship cannot be put down to chance.

The key to explaining Brooks is her knack for forging well-targeted friendships. Before she married Charlie Brooks, she and Ross Kemp were a New Labour power couple, considered close friends of the Blairs. In 2008, she attended a "sleepover" at Chequers, held by Sarah Brown, while today she is close to Samantha Cameron.

As one person who knows her says: "Rebekah is immensely likeable and fun. She's just full of fire and energy." Stories abound of Wade using her charm to best advantage, wheedling stories out of reluctant informers. Her hunger to be the best made her an ideal candidate as a tabloid

editor. But her drive wasn't always applied in the right direction. Her stint editing the News of the World was defined by her campaign to name and shame paedophiles in the wake of the murder of Sarah Payne, which was criticised for being grossly irresponsible.

While Rupert Murdoch approved of her go-getting instincts, others felt she was coarsening the tone of her papers. Wade found plenty of enemies in the old guard at News International. They would snipe about her inexperience and lament the passing of a more gentlemanly management style. Her ascendancy coincided with the alleged proliferation of illegal practices to get stories. When the News of the World's royal editor, Clive Goodman, was imprisoned for phone-hacking, Piers Morgan, who edited the paper for a year in the 1990s, said: "I feel a lot of sympathy for a man who has been the convenient fall guy for an investigative practice that has been going on at almost every paper in Fleet Street for years."

We do not know the extent of Brooks's involvement in phone-hacking. Nor, as he admits, does Cameron. But we do know how close they have become, even if, in the context of the BSKyB bid, they have become a little embarrassed by their friendship. Locals speak of how they go to elaborate lengths not to be seen together, even texting one another to stagger their arrivals at social events.

And on 9 October last year, Cameron celebrated his 44th birthday with a weekend house party at Chequers. It was a bibulous affair, an opportunity for Dave to let his hair down after the death of his father three weeks before. The Moscow Mules flowed late into the night, all to be walked off in the Chilterns the next day, a weekend out of politics. Only his very oldest and closest friends from school and university were invited, such as Dominic Loehnis and Giles Andreae.

"There was almost nobody there who had not known him for at least 20 years," says one. "It was the gathering of Dave's old gang." The one exception was... Rebekah Brooks. The pair genuinely like one another (although Cameron seems to have taken Andy Coulson's side in the last few days). Cameron protests that he and Charlie Brooks are old friends from school (in fact, Charlie was three years above him and better friends with Cameron's brother). But maybe this is the sort of thing he meant when he said on Friday that party leaders had spent too much time courting support.

The Independent on Sunday

June 3, 2007
The IoS Diary;
Sindy Pendant

LENGTH: 750 words

Is Andy Coulson a fool or a knave? Some Tories disapprove of the appointment of the man who, as editor of the News of the World, presided over reporter Clive Goodman's eavesdropping on royal conversations (for which Goodman went to prison), and you can see why. Coulson eventually took "ultimate responsibility" for Goodman's crimes and resigned, but didn't let on as

to whether he knew what Goodman had been up to, or that Goodman was forking out a six-figure annual research fee for his information. When the IoS asked News International six months ago specifically whether Coulson knew, it wouldn't comment. Now the fog has cleared, and they tell us that Coulson didn't know. Happily, two weeks ago the Press Complaints Commission cleared Coulson, saying there was "no evidence" that anyone else at the NoW was aware of Goodman's activities. Had we asked the PCC a month ago whether Coulson knew, what would they have said then? "That's a hypothetical question," says a spokesperson.

MAIL ON SUNDAY (London)

July 17, 2011 Sunday

REBEKAH VETOED BBC MAN AND TOLD CAMERON HE SHOULD GIVE NO 10 JOB
TO ANDY COULSON

BYLINE: By Simon Walters political editor

LENGTH: 519 words

DISGRACED former News International boss Rebekah Brooks intervened to persuade David Cameron to make ex-News of the World editor Andy Coulson his spin doctor, it was claimed last night.

She is understood to have urged Mr Cameron to scrap plans to give the job to a senior BBC journalist. Mr Cameron was told it should go to someone who was 'acceptable' to News International.

The disclosure increases pressure on Mr Cameron over his close links to Mrs Brooks and the Murdoch empire.

It follows the revelation that Mr Coulson stayed at the Prime Minister's country residence, Chequers, two months after he was forced to quit as Downing Street's head of communications over the phone-hacking scandal.

Mr Cameron met News International executives 26 times in 15 months.

Mr Cameron had been on the brink of appointing the BBC's Guto Harri as his media chief when he was Opposition leader. Mr Harri and his family spent a weekend with the Camerons in 2007 to discuss the job offer.

However, it went to Mr Coulson after Mrs Brooks got involved, according to sources in the Tory party and at News International. She is said to have told Mr Cameron that the post should go to Mr Coulson to strengthen links between the Tories and News International. He had resigned a few months earlier as News of the World editor over the phone-hacking storm.

An individual intimately involved in Mr Coulson's recruitment said: 'Rebekah indicated the job should go to Andy. Cameron was told it should be someone acceptable to News International. The company was also desperate to find something for Andy after he took the rap when the phone hacking first became an issue. The approach was along the lines of, "If you find something for Andy we will return the favour".'

Mr Coulson, who was arrested this month over the phone-hacking furore, resigned from the News of the World in January 2007. Weeks later, the paper's Royal correspondent Clive Goodman was jailed for phone-hacking. Mr Coulson's appointment as Mr Cameron's communications director in July 2007 came after he was close to agreeing to give the post to Welshman Mr Harri, who was then the BBC's North America business correspondent.

When Mr Coulson moved into Downing Street after last year's Election, Mr Cameron's director of strategy Steve Hilton was given confidential information concerning the extent of Mr Coulson's alleged involvement in phone-hacking. He passed it on to the Prime Minister's chief of staff, Ed Llewellyn.

Mr Cameron now says the information was not passed on to him.

George Osborne, who was then Shadow Chancellor, also urged Mr Cameron to pick Mr Coulson over Mr Harri. 'George is fixated with following how Tony Blair did everything but the decisive factor was Rebekah,' said a Tory aide.

In 2009, the News of the World and The Sun abandoned support for Gordon Brown and switched to Mr Cameron.

Mr Harri went on to be communications director for Mr Cameron's Tory rival, London Mayor Boris Johnson.

A Tory source said: 'Lots of people said Andy would do a good job but it is not true that anyone from News International lobbied Mr Cameron to get him the position.'

You can bank on Cameron to pass the buck

By Kelvin Mackenzie

UPDATED: 15:31, 4 February 2012

During the height of the phone-hacking scandal last summer, David Cameron sent an emissary to Rebekah Brooks, who had been forced out of her job as News International chief executive.

The message from the Prime Minister was: ‘Sorry I couldn’t have been as loyal to you as you have been to me, but Ed Miliband had me on the run.’

It’s always the same. It doesn’t matter what the issue is, when the going gets tough .□.□. Cameron gets going — in the opposite direction.

Read more: <http://www.dailymail.co.uk/debate/article-2096207/Fred-Goodwin-knighthood-You-bank-David-Cameron-pass-buck.html#ixzz1sVzM6TMx>

STATEMENT OF TRUTH

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

Signed

James Hanning

Dated