

**Claim No. BL-2019-0001787**

**IN THE HIGH COURT OF JUSTICE**  
**BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES**  
**BUSINESS LIST (ChD)**

**IN THE MATTER OF MIRROR NEWSPAPERS HACKING LITIGATION**

**BETWEEN:**

**HRH DUKE OF SUSSEX**

**Claimant**

**-and-**

**MIRROR GROUP NEWSPAPERS LIMITED**

**Defendant**

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**WITNESS STATEMENT OF PRINCE HARRY, DUKE OF SUSSEX**

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**I, PRINCE HARRY, DUKE OF SUSSEX, of [address available to the trial judge] WILL STATE AS FOLLOWS:**

1. I make this statement in support of my claim for damages and other remedies against MGN Limited, the publishers of the *Daily Mirror*, the *People* and the *Sunday Mirror* newspapers.
2. The facts and matters set out in this witness statement derive from my own knowledge and are true except where I indicate that the information derives from a third party, in which case it is true to the best of my knowledge and belief. This witness statement was prepared by my solicitors following a series of video calls with them.
3. In this witness statement I refer to documents which are listed at the end of the statement. These include 50 newspaper articles published by the Defendant's newspapers which contain private and confidential information relating to me and my associates, which was not publicly known, and which I now understand might have been obtained unlawfully by the Defendant, along with documents that have been disclosed in the course of my claim.

## **My Background**

4. I was born into the British Royal Family on 15 September 1984, to my father King Charles III, and my mother Diana, Princess of Wales. I am currently fifth in line to the throne. I was educated in the UK at Ludgrove School and Eton College. I then underwent officer training at the Royal Military Academy Sandhurst where I was commissioned as a Cornet into the Blues and Royals, and then the Army Air Corps. I served in the Army between 2005 and 2015, stationed primarily in the UK but also posted to Afghanistan between December 2007 and February 2008 and between September 2012 and January 2013. Since leaving the Army, I have remained closely involved with the Armed Forces.
5. Following my departure from the military, I became a full-time working member of the Royal Family. Part of my role involved representing my late grandmother, Queen Elizabeth II, at official engagements and charity events in the UK and across the world. I also launched various projects, alongside my brother and his wife, with particular focus on mental health.
6. I met my wife Meghan, in 2016. We were married at St George's Chapel, Windsor Castle in May 2018. Together we have represented the monarchy at royal engagements both in the UK and overseas.
7. Our son, Archie, was born in May 2019. We lived at Frogmore Cottage in the Home Park of Windsor Castle up until 2020 when Meghan and I reluctantly decided to step back from our full-time roles as senior members of the Royal Family and split our time and work between the UK and North America. In large part, this was due to the constant intrusion, inciting of hatred and harassment by the tabloid press into every aspect of our private lives, which had a devastating impact on our mental health and wellbeing. We were also very concerned for the security and safety of our son.
8. I now live in California with my wife, son and daughter, Lilibet, who was born in June 2021.

## **My Relationship with the Tabloid Press**

9. It is no secret that I have had, and continue to have, a very difficult relationship with the tabloid press in the UK.
10. In my experience as a member of the Royal Family, each of us gets cast into a specific role by the tabloid press. You start off as a blank canvas while they work out what kind of person you are and what kind of problems and temptations you might have. They then start to edge you towards playing the role or roles that suit them best and which sells as many newspapers as possible, especially if you are the 'spare' to the 'heir'. You're then either the 'playboy prince', the 'failure', the 'drop out' or, in my case, the 'thicko', the 'cheat', the 'underage drinker', the

'irresponsible drug taker', the list goes on. As a teenager and in my early twenties, I ended up feeling as though I was playing up to a lot of the headlines and stereotypes that they wanted to pin on me mainly because I thought that, if they are printing this rubbish about me and people were believing it, I may as well 'do the crime', so to speak. It was a downward spiral, whereby the tabloids would constantly try and coax me, a 'damaged' young man, into doing something stupid that would make a good story and sell lots of newspapers. Looking back on it now, such behaviour on their part is utterly vile.

11. Whilst they would, of course, report on my successes in life, it seemed to me that they took far greater pleasure in knocking me down, time and time again. This extended to my relationships. I always felt as if the tabloids wanted me to be single, as I was much more interesting to them and sold more newspapers. Whenever I got into a relationship, they were very keen to report the details but would then, very quickly, seek to try and break it up by putting as much strain on it and creating as much distrust as humanly possible, as I shall go into in more detail later in this statement. This twisted objective is still pursued to this day even though I'm now married.
12. Whenever I have been in a relationship, I have always tried to be the best partner that I possibly could but every woman has her limit. Unfortunately, they are not just in a relationship with me but with the entire tabloid press as the third party. At no point did I have a girlfriend or a relationship with anyone without the tabloids getting involved and ultimately trying to ruin it using whatever unlawful means at their disposal. Again, I will go into this in more detail later in my statement.
13. Of course, I accept my public role within the Royal Family and know that every time I put a suit and tie on in order to carry out an official engagement, I'm going to get photographed because most of the press are always there. Even if I get 'papped' on the way there or on the way back, then that's absolutely fine too because it's expected. But, if the next day, I want to go out and take my dog for a walk, I would expect some level of privacy, which unfortunately does not and never has existed for me. Despite the common misconception, I was no more than 5% funded by the taxpayer while I was a working Royal in the UK, yet it felt as though the tabloid press thought that they owned me absolutely, and deserved to know everything there is to know about me, my life, my movements and the lives of those people who came into my orbit.
14. There also seems to be a real blurring of the lines in terms of what is in the public interest and what is of interest to the public. The tabloids concentrated on salacious stories about my relationships and so on to satisfy the latter while appearing to completely ignore the former, as a means of justifying their intrusion. I simply don't understand (and never have) how the inner, private details of my relationships for example, could have anything to do with the well-being of society or the running of the country and therefore be in the public interest or, indeed, how the use of voicemail interception and other unlawful information gathering techniques to uncover such private information could be either. I obviously understand why my relationships might be

of interest to the millions of tabloid readers but that is something entirely different. What I complain of here is illegal or unlawful, and that is something which I feel incredibly strongly about, not just in a personal capacity but as part of the role I have always tried to take as my duty to stand up to things which are wrong and the public or people without the same resources should not have to accept or undergo.

15. It even got to the stage where the tabloids would routinely publish articles about me that were often wrong but interspersed with snippets of truth, which I now think were most likely gleaned from voicemail interception and/or unlawful information gathering. This created an alternative and distorted version of me and my life to the general public - being those people that I had to serve and interact with as part of my role in the Royal Family - to the point where any one of the thousands of people that I met or was introduced to on any given day, could easily have gone *'you know what, you're an idiot. I've read all the stories about you and now I'm now going to stab you'*. This extended to every new place that I went to whether it be a classroom at school or a new course in the army, I always wondered, when walking into a room of unknown people, whether they had read all these stories and what judgment they had already formed based on what they'd read in the tabloids.
16. Whatever advantage people claimed I had by walking into a room as 'Prince Harry' was immediately flipped on its head, because I was facing judgments and opinions based on what had been reported about me, true or not. I expected people to be thinking *'he's obviously going to fail this test, because he's a thicko'*. If you were one of the examiners for the Regular Commissions Board, for instance, then you are going to expect me to screw up, as you've already made an opinion before even meeting me based on the tabloid reports. It meant that I felt that I never went in at the same level as everybody else because the spotlight was always on me.
17. I genuinely feel that in every relationship that I've ever had – be that with friends, girlfriends, with family or with the army, there's always been a third party involved, namely the tabloid press. Having seen me grow up from a baby (being born into this 'contractual relationship' without any choice) and scrutinised my every move, the tabloids have known the challenges and mental health struggles that I have had to deal with throughout my childhood and adult life and for them to then play on that and use it to their own advantage, I think is, well, criminal.

### **My Associates**

18. During the Relevant Period, I was in regular contact and often exchanged voicemail messages with the following individuals:
  - a. HRH The Prince of Wales, my brother. He is now first in line to the throne and, due to his position, the press have always been very interested in him. As brothers, we naturally discussed personal aspects of our lives as we trusted each other with the

private information we shared. We would often speak over the phone and regularly left voicemails for one another containing very private and sensitive information about our private, family and professional lives. We would discuss our personal relationships, education and careers as well as social arrangements over the telephone and voicemails. I am aware that my brother was also a victim of phone hacking and unlawful information gathering.

- b. Princess Diana, my mother. We were obviously very close. Up until her death in 1997, we were in regular telephone contact when we were not together, especially as I boarded at school. Private information relating to me would have been present in voicemails left on her phone by members of my family or the Royal Household.
- c. HRH King Charles III, my father. During the Relevant Period, my father and I were in regular contact by telephone. He was first in line to the throne during this period and of great interest to the press due to his position. My private information would have been present on voicemails left on his landline phone by other members of my family or the Royal Household.
- d. Frances Shand Kydd, my maternal grandmother. The press were always interested in her, as they were in anyone that spoke regularly to my mother hoping to find out information about her and her sons.
- e. Chelsy Davy, a former girlfriend of mine. We met in about early 2004 and were in a relationship which continued, on and off, until around mid-2010. Our relationship was long distance for the majority of the time we were together, with Chelsy and I often living in different countries, so we relied on communicating by phone a lot. We, naturally, spoke about all types of personal matters, including all aspects of our relationship and this was often through voicemail. As my girlfriend, I trusted Chelsy with the most private of information and visa versa.
- f. Mark Dyer – or 'Marko', as I called him, a former royal equerry and still a close friend of mine. During the Relevant Period we communicated regularly on the phone, leaving each other voicemails about my private and family life, my education and my career. Mark was a key figure in my childhood and throughout adolescence, he was privy to lots of private and sensitive information about me, my family and the Royal Household. Mark would also have exchanged voicemails with others about my private affairs.
- g. Helen Asprey, my private secretary. She was intrinsically involved in all aspects of my private, family and professional life, and was responsible for making arrangements for me. Due to her role, she knew lots of private information about me. I was in regular

phone contact with Helen about all aspects of my life and during the Relevant Period, we exchanged frequent voicemails. Helen would have also exchanged voicemails with others containing my private information, such as my day-to-day plans and whereabouts, my private affairs and issues relating to the Royal Household.

- h. Guy Pelly, an entrepreneur and a friend of mine. We have been friends since childhood and have been in regular telephone contact since we were adolescents. The press were interested in Guy because of his close friendship with me and my brother. Guy and I would often speak over the phone and regularly left voicemails for one another containing private information during the Relevant Period. We would tell each other about very private and sensitive things going on in both our personal and professional lives.
- i. Jamie Lowther-Pinkerton, my former private secretary. He held this role from 2005 to 2013. He was also my brother's private secretary during this period. Jamie was involved in almost all aspects of my private, family and professional life and he was responsible for making arrangements for me relating to these matters. He knew lots of private information about me, such as my day-to-day plans, family matters and issues relating to the Royal Household. I was in regular phone contact with Jamie and frequently exchanged voicemails with him. Jamie would have also exchanged voicemails with others containing private information about me and my affairs.
- j. Alexandra Shan Pettifer (née Legge-Bourke), known to me as 'Tiggy', a close companion and confidant. She was my guardian during childhood, and we have a very close relationship. As my nanny during childhood, she played a central role in my life during the Relevant Period and would have exchanged voicemails with others regarding all aspects of my life, including my whereabouts, health, education and my family life. As I got older and our friendship continued, I was in regular phone contact with Tiggy and became her son's godfather. We often exchanged voicemails which contained sensitive and private information about both of our private lives. Due to the level of trust between us, I regularly talked to her about things I would not otherwise share outside a close group of friends.
- k. Paddy Haverson, my father's former Communications Secretary. He held this role from 2004 to 2013, and was also the Official Spokesman for my brother during this period. Given the nature of his roles, he knew a lot of private information about me and would have exchanged voicemails with others concerning my private information, such as my day-to-day plans and whereabouts, my private affairs and issues relating to the Royal Household.

- l. Thomas Inskip, a school friend of mine. During the Relevant Period, Thomas and I were in regular phone contact and exchanged frequent voicemails about our education, and our family and private lives. We spent a lot of time together and would often leave voicemails for one another making social arrangements.
  
- m. Jamie Murray Wells, an entrepreneur and close childhood friend. My brother and I spent a lot of time with Jamie and we would leave each other voicemails regarding our whereabouts and making plans for social arrangements, as well as talking about our private and family lives.
  
- n. HRH The Princess of Wales, my brother's wife. Catherine and my brother started dating in 2003. We occasionally exchanged voicemails in which we discussed private and sensitive matters regarding our family and personal lives. We would also make plans for social arrangements over voicemail.
  
- o. Natalie Pinkham, a sports television presenter and a close friend of mine. We met in around 1999 and attended various social events together during the Relevant Period. We often left voicemails for one another to make arrangements for where we should meet, and what our plans were. We also discussed our private lives on the phone and in voicemails.
  
- p. Caroline Flack, the late television presenter, was a friend of mine. We met in around 2009 and during the Relevant Period, we attended a couple of social events together. The press were always interested in Caroline because of her job as a well-known presenter. For a brief period, I was in phone contact with Caroline and we exchanged voicemails regarding our personal lives, and to make arrangements for meeting up.

### **My Use of my Mobile Phone/Voicemail**

- 19. I can't recall exactly when I was first issued with a mobile phone by the Institution, but I think it was when I first went to Eton, when I was still a minor. I have never been the named account holder for any mobile that I have had and have almost never received a phone bill. As far as I was aware, this was all dealt with by the Institution, presumably for security purposes although that now seems rather ironic.
  
- 20. As I was very heavily involved with various commitments during the Relevant Period, whether it was during my time at school or at Sandhurst, during my career in the army or afterwards when I was undertaking engagements as a senior member of the Royal Family, I would constantly be leaving and receiving voicemails, as text messaging was much less common back then. It was my main means of communicating with my family (including my mother who

I was obviously extremely close, especially at that time), my girlfriend at the time, my friends, members of the Royal Household and those I was working with.

21. My voicemails would include incredibly private and sensitive information about my relationships, my operational security and that of my family, my work both in the army and as a senior member of the Royal Family, and also any plans that I had made for my time off including holidays and downtime with friends. They would also include incredibly private and sensitive information about those with whom I associated.

### **Unusual Mobile Activity**

22. I remember on multiple occasions hearing a voicemail for the first time that wasn't 'new', but I don't remember thinking that it was particularly unusual – I would simply put it down to perhaps a technical glitch, as mobile phones were still relatively new back then, or even just having too many drinks the night before (and having forgotten that I'd listened to it).
23. I wouldn't go into my voicemail unless the little envelope symbol flashed up on my phone signalling to me that I had a new message. Sometimes this symbol would vanish before I had a chance to listen to the voicemail. I don't know how long after they'd been listened to that the symbol vanished, presumably straight away. I also distinctly remember people saying to me "*did you not get my voicemail?*" on both a personal and a work-related level. I was like, "no", and sometimes I would go back into my voicemail to look for it but still couldn't find it.
24. I also received some missed calls and hang-up calls, but again I don't remember thinking that these were particularly suspicious at the time, although I now understand their significance in terms of phone hacking.
25. With the benefit of the knowledge I have now gained of the details of how phone hacking took place, I believe that both mine and my Associates voicemail messages were hacked by the Defendant, and that it used other unlawful means to obtain private information about me, including material that has come from listening to live calls I also made on my landlines.

### **Impact of MGN's intrusion into my life**

26. The fact that the Defendant's journalists and those instructed on their behalf were listening in to private and sensitive voicemails at the level of detail discussed in this statement rather suggests that they could have heard anything and everything. This not only creates a huge amount of distress but presented very real security concerns for not only me but also everyone around me. I would say their actions affected every area of my life.
27. It created a huge amount of paranoia in my relationships. I would become immediately suspicious of anyone that was named in a story about me, whether it was Mark Dyer, Tiggy or



her brother, Harry, for example. I felt that I couldn't trust anybody, which was an awful feeling for me especially at such a young age. As I am uncovering the extent of the unlawful activities carried out by MGN's journalist and senior executives towards me, I feel somewhat relieved to know that my paranoia towards my friends and family had, in fact, been misplaced, although feel sad for how much it impacted my adolescence.

28. In terms of my relationship with Chelsy, we had to conduct it over long distance, which is incredibly hard even without the frenzied interest from MGN journalists that we had to endure. I remember that whenever she flew into Heathrow, I felt such concern about the possibility of her jumping into a taxi because someone from the Defendant always seemed to know that she was coming – it is only since commencing this claim that I realised that MGN journalists were blagging her flight details so that would know exactly when she was going to arrive so that they could have photographers at the ready. I talk about this more in relation to some of the articles below. I wanted to be there to welcome her, as any boyfriend would but even that came with challenges.
29. On one of Chelsy's first trips to the UK, I went to pick her up with my Personal Protection Officers, (or 'PPOs' as I will call them throughout this statement). I walked into the Arrivals Hall with a baseball cap on and immediately spotted five separate paparazzi sitting on benches with cameras in bags, their hands inside rucksacks and everyone else looking at me – I remember that someone was videoing me with one of those tiny little cameras between their legs. I recall thinking how on earth did they know I was going to be there, but now it's obvious. These kind of incidents made me fear for our safety. Here were five big, burly and dodgy looking men, with their hands in their pockets or in rucksacks and satchels in a busy public place. My security and I simply couldn't know whether they were reaching for a camera or drawing some kind of weapon.
30. That was the first and only time I went into the Arrivals Hall at Heathrow to collect Chelsy. For all future trips to Heathrow, I decided to sit in the car whilst my PPO would go and fetch her. I would then get a text message from her saying, "*I've landed*", and I'd say, "*that's great – so and so is in there, he's wearing such and such*". The doors from the airport to the carpark would then burst open and there would typically be five or six paparazzi literally running circles around Chelsy, so much so that I couldn't even see her. That was her welcome to the UK, and it happened constantly whenever she arrived here. On occasion, the paparazzi would be so aggressive in their pursuit of her that we would have to enlist the help of the airport police, which obviously detracts from their main task of keeping the airports, and the general public who use them, safe.
31. Every time I was in a relationship or even a rumoured relationship, that whole person's family, and often their friends, would be dragged into the chaos and find themselves the subject of unlawful activity on the part of MGN. That's horrible for anyone. I can remember that at least

one of my girlfriends told me she was warned off me by her parents saying '*is it really worth all the aggravation?*' – our relationship ended shortly after.

32. There was nowhere that was 'off limits' for the Defendant's newspapers. There was no down time or escape. I remember that whenever Chelsy and I went on a trip to Bazaruto, a small island off the coast of Mozambique, to try and get away from all the madness and enjoy some peace and quiet, journalists and photographers from MGN and the other tabloids would literally turn up and book into the hotel before we got there. I now believe they had blagged our flight details and hotel bookings and/or intercepted our voicemails. We were never on our own and able to enjoy each other's company away from the prying eyes of the tabloids. This put a huge amount of unnecessary stress and strain on our relationship.
33. We could also never understand how private elements of our life together were finding their way into the tabloids, and so our circle of friends became smaller and smaller. I remember finding it very hard to trust anyone, which led to bouts of depression and paranoia. Of course, now that we know that this information was invariably obtained by unlawful means, these friendships were lost entirely unnecessarily, which is a matter of huge regret for me.
34. Ultimately, these factors led her to make the decision that a Royal life was not for her, which was incredibly upsetting for me at the time.

## **Disclosure**

35. Although my solicitors have advised me that it would not be appropriate for me to provide a running commentary on each and every documents disclosed by Defendant in this statement, I have had the opportunity to review them and would like to say that I'm shocked and appalled at the sheer volume of payments made by MGN titles to private investigators (who are known in this litigation to have used voicemail interception and other unlawful information gathering techniques to obtain private information about their targets) for private information about me and my Associates over a ten year period (from 1999, when I was still very much a minor, to 2009).
36. Specifically, there were 135 separate payments for me and a further 154 for my Associates, which I understand from my solicitors are huge numbers in the context of this litigation, especially considering that the Defendant is known to have concealed and destroyed evidence of their wrongdoing on an industrial scale. I now realise that my acute paranoia of being constantly under surveillance was not misplaced after all. I was also shocked and disgusted to discover that my name and mobile number were in a contact list belonging to known hacker, Nick Buckley, which is further proof that I was a victim of voicemail interception and unlawful information gathering.

37. Additionally, I was upset to discover the amount of suspicious call data and the 13 private investigator payments for Chelsy. Had she not been in a relationship with me, she would never have had to endure such a horrific experience at the hands of MGN's journalists. There are even eight private investigator payments made in relation to my mother, which I have only learnt of since bringing my claim. This makes me feel physically sick.
38. While on the subject of my mother, I was even more shocked, disgusted and appalled when I was shown by my solicitors three hand-written letters from her to the well-known television personality, Michael Barrymore. They are dated 23 March, 25 April and 2 June 1997 respectively and convey my mother's concerns for Mr Barrymore's well-being and kindly offering him a shoulder to cry on.
39. In the first letter, she said "*I did want to emphasise that I'm here for you whenever – it's very easy to pop round and see you or please telephone now you have my number, anytime*". In the second letter she said "*I was devastated tonight to hear that the Daily Mirror have [sic] been telephoning my office to ask details about six meetings that are supposed to have taken place between us...nobody around me knew of our Sunday evening plan & I would never do anything to cause you any personal distress & it only remains for me to say how deeply sorry I am that what I considered to be a private and precious matter has become public property*".
40. In the third letter, she said "*Are you ok?! I am concerned because I haven't heard for you for some time – I hope the silence is good news! I have had a nightmare time in the tabloids! I am here on 937-2721 if you need to talk*".
41. All three letters were written during Piers Morgan's editorship of the Daily Mirror and he even admits on page 122 of his book entitled '*The Insider: The Private Diaries of a Scandalous Decade*' that "*[t]he TV comic [Barrymore] has recently been treated in a clinic for booze and drug addiction, and I'd heard rumours that Diana had been secretly comforting him*".
42. As the first and third letters confirm that Mr Barrymore had my mother's landline number, it is safe to assume that they were in contact over the phone. Given my mother's very hectic schedule in the months leading up to her death in 1997, I think it is also safe to assume that she would have been exchanging voicemails with Mr Barrymore about his problems and their plans to meet up. In light of what she says in the second letter about being "*devastated*" to find out that the Daily Mirror had somehow discovered details of their private meetings and being horrified at the thought of Mr Barrymore thinking that she had leaked the details together with Mr Morgan's reference to "*secret*" meetings, I can only assume that this information had been obtained via voicemail interception and/or other unlawful information gathering such as live land line tapping.

43. Again, the thought of Piers Morgan and his band of journalists earwigging into my mother's private and sensitive messages (in the same way as they have me) and then having given her a "nightmare time" three months prior to her death in Paris, makes me feel physically sick and even more determined to hold those responsible, including Mr Morgan, accountable for their vile and entirely unjustified behaviour.

#### **Articles Under Complaint**

44. My solicitors have advised me that where more than fifty articles are pleaded by a claimant in this litigation, twenty-five articles must be selected by each party for initial consideration by the court. I have dealt with the fifty articles selected by both me and MGN below, in chronological order. These are numbered by reference to my Amended Particulars of Claim.

45. To prepare this witness statement, I have been through each of the articles highlighted with my solicitors on a series of video calls in January and February 2023. To a very small extent, this exercise has refreshed my memory, but I do remember a lot of what was going on throughout the Relevant Period, including the incidents or stories referred to in the articles below, even if I don't recall seeing the specific articles at the time. I set out my recollection and knowledge of these events, and the impact of the articles, in the paragraphs below. The list of documents refers to both the text-only and 'as published' versions of the articles, to the extent that these have been disclosed by the Defendant.

#### **Article 4: "DIANA SO SAD ON HARRY'S BIG DAY" Mirror, 16 September 1996, John Todd**

46. This article, which was published on page 2 of the Daily Mirror and features a photograph of me at the top, contains details of my mother coming to visit me at Ludgrove school on my 12<sup>th</sup> birthday, including how long she spent at the school with me. It also includes a quote from 'a couple who were walking on a nearby footpath', that reports my mother seemed to have been crying and looked stressed. This section of the article makes no sense to me. It's my recollection that when my mother collected or visited me at school, she would be literally 'in and out' of the front door of the school. While there is a public footpath next to Ludgrove, I'm not sure how anyone would have been able to see my mother from there and establish that she was upset, or why anyone would have stayed there long enough to be able to say she was only inside for 20 minutes. I am told by my solicitors that Mr Todd, the journalist bylined on this article, is known to have been a user of Commercial & Legal Services.

47. The article also reveals that I was "distressed" at the ill health of Paddy Whiteland, a gardener that used to work with my father who we were all close to, along with saying that I was taking the divorce of my parents "badly". I think it's quite ironic for the Defendant's journalists to be remarking on how difficult I was finding this period, when articles like this, and the conduct of the press, including the Defendant's journalists, contributed to that feeling. While I was

sheltered from a lot of press coverage by my family, I recall seeing the odd headline in newspapers at this time as copies of the newspapers were placed in the Royal residences, and obviously other children at school talked about things they'd seen or read. Having every detail of your family life played out publicly is particularly difficult as a child. Knowing now that the Defendant's journalists were hacking everyone's telephones and private communications makes it even more distressing and unethical.

**19 "*Princes take to the hills for gala*" Mirror, 17 July 2000, Ian Miller**

48. This article, which was published on page 9 of the Daily Mirror and written by Ian Miller, reports that my brother and I would not be attending the gala pageant to celebrate the 100<sup>th</sup> birthday our great grandmother, the late Queen Mother. I understand that Ian Miller is known in this litigation for being involved in the instruction of private investigators. I am told by my solicitors that he was a frequent user of Commercial & Legal Services, and also used JJ Services and Searchline (all entities known to have engaged in unlawful information gathering techniques). He also appears in Steve Whittamore's contact list, seized by the ICO in March 2003, which I understand to be significant.

49. The article states we were sticking to our "*controversial plans*" to join friends on a trip to the Lake District, 270 miles away from the event, and that we would return to London for her actual birthday on 4 August. The article includes a comment from a spokesperson from St James' Palace that stated the decision had not caused ripples in royal circles, and confirming that it was a private matter that no one in the family was upset about.

50. I don't recall this article from the time, but I do know I didn't attend the pageant. What strikes me about this article is that the comments from St James' Palace make clear that the decision as to where William and I would be, was a private matter. Proactive Palace statements were made only on special or important occasions. I do not believe a statement would have been made for this. To me, it seems like the Palace were approached with information about a possible fallout from the decision for us to miss the event, which they then responded to. It's only now, looking back with the benefit of hindsight of knowing what the Defendant's journalists were doing, that you question how they got this kind of information to put to the Palace at all.

**21 "*3am – HARRY'S TIME AT THE BAR*" Mirror, 19 September 2000, Jessica Callan, Eva Simpson, Polly Graham**

51. This article contains details of a lunch I had with friends at The Ifield pub in Chelsea to celebrate my 16<sup>th</sup> birthday. It was published on page 19 in the Daily Mirror's 3AM column, written by Jessica Callan, Eva Simpson and Polly Graham. I don't know how anyone would have known I was at this particular pub, at this particular time, in order to be there taking photographs of me. Based on what I understood at the time of how public engagements worked and the security

measures in place for me and my family, I always found these kind of 'coincidences' to be odd. I now understand that the bylined journalists, and the '3AM desk' as a whole, are well-known in this litigation for being involved in phone hacking and other forms of unlawful information gathering ("UIG"). My solicitors have advised me that many '3AM' articles authored by Ms Callan, have previously been admitted by Defendant to have been the product of UIG.

52. What strikes me about this article in particular is the comment that a week before, I had insisted that one of my PPOs join me and a friend when we had lunch at Pizza Express. I'm unsure of how the Defendant's journalists could have been aware of any private conversation between me and my PPO, but it is notable because it's another example of the Defendant seeming to know where I was at a particular point in time. Private visits to restaurants with friends were never publicly announced (in fact, our movements were always intended to be kept secret), nor did this kind of thing fall within any official duties, yet not only did the Defendant seem to know where I was at all times, they felt able and entitled to report it to the public without any regard for my security or any private life I wished to have, even at the age of just 16.

**22 "SNAP..HARRY BREAKS THUMB LIKE WILLIAM; Exclusive" Mirror, 11 November 2000, Jane Kerr, Royal Reporter**

53. This article, which was published on page 11 of the Daily Mirror, written by Jane Kerr, reported that I had chipped a bone in my thumb. My solicitors have shown me documentation that suggests Jane Kerr had previously instructed Jonathan Stafford (a private investigator known to have undertaken unlawful information gathering activities) to obtain ex-directory details for her. The article stated that I had my arm in a sling, after having a minor operation following an accident during a game of football at school. It is stated that a friend fell on me during the game. The article included a comment from a Palace spokesperson, which according to the article was given after my father had visited me and stated that the injury was thought of, at first, as only bruising but a precautionary X-ray led the surgeon recommending a minor operation.
54. The article itself reports that receiving a comment from the Palace contrasts with the previous approach taken by my family, whereby my father had made a complaint to the Press Complaints Commission after the Defendant had reported on a rugby injury I had sustained. Again, it seems to me that the Palace may have been approached for this comment, rather than a proactive statement being released, although I can't be sure of this. The level of detail in is just surprising, as is the specific comment made by the Defendant's journalists that I had been told by doctors not to play football for a "*few weeks*". This isn't attributed to the Palace spokesperson, which seems odd although any comments from the Palace would have been strictly 'need to know'. I certainly didn't want any information about injuries I had sustained being reported so publicly. They weren't life threatening, they were routine childhood injuries, the odd broken bone. I was often teased at school, largely as a result of this kind of article.

**27 “Tiggy Legge Walk” Mirror, 3 September 2001, Wayne Francis**

55. This article contains details of me being asked to be godfather to the new baby of Tiggy, who - as set out above - was my childhood nanny. The article was published on page 15 of the Daily Mirror and carried a photograph of Tiggy walking with a pram and was written by Wayne Francis. I understand that Wayne Francis is known in this litigation for his involvement in UIG practices. The article also includes a quote from a ‘friend’ which said Tiggy and my father had already discussed the possibility of me being named as godfather but that my father needed to gain “*approval in certain quarters*”, along with a comment from a ‘Palace insider’ that my father was likely to say yes. It also states that I had already visited Tiggy and the baby.

56. It is true that I was asked to be godfather by Tiggy and while I’m not aware of any conversations that may have happened between Tiggy and my father, it is likely that it would have been necessary for her to ask permission, especially as I was 16 years old at the time of this article. Already, I was beginning to feel extremely guarded about who I could talk to about my life because private and personal details kept appearing in the tabloids and became common knowledge, and I couldn’t understand who may have been talking to the press. I’m appalled that the article says it was a ‘friend’ that gave the information, as if someone close to us was leaking private details. I would have been unnecessarily suspicious of Tiggy, or suspicious that she had told someone and that person had told the press, but now, with the benefit of hindsight, it seems more likely that the Defendant’s journalists were unlawfully intercepting private conversations about this.

**30 “RUGGER OFF HARRY” Sunday Mirror, 11 November 2001, Andrew Buckwell**

57. This article, marked as an ‘exclusive’ and published on page 39 of the Sunday Mirror, revealed an injury that I had sustained to my back while playing polo, which had forced me to stop playing rugby. It reported that doctors had warned me that continuing to play could cause lasting damage to my spine, that it wasn’t known when it would be safe for me to resume playing rugby, and that I had started to play football instead. I understand that Andy Buckwell is known in this litigation for his involvement in unlawful information gathering, and the habitual commissioning of private investigators, including Jonathan Stafford and Christine Hart.

58. I’m appalled by how brazen the article is in describing itself as an ‘exclusive’ and attributing some of the details to an unidentified ‘royal source’. In contrast to article 22, which I discuss above, there’s no official comment reported from the Palace on this, so it’s not at all clear to me how the Defendant got this kind of information.

59. I find it shocking that the article reveals such specific, detailed and private medical information including the advice that my doctors had given me, especially as this is not the kind of information I was freely revealing to anyone, especially not my class mates. I suffered injuries, just like everyone else that was playing a lot of sport at school, but it was only my injuries that were being splashed across national newspapers, nobody else in my class was enduring this treatment. I wasn't reading these stories, but others at school were and I was treated differently as a result. This happened at school and later when I was at Sandhurst. I was often singled out for being a 'sick note' or a 'pussy' because articles like this made routine injuries seem like such a big deal.

**31A “HARRY TOOK DRUGS” (page 1) and “COOL IT HARRY” (page 11) Sunday Mirror, 13 January 2002, Gerard Couzens**

60. These articles, which appeared on the front page of the Sunday Mirror and on page 11, reported on allegations that I had been taking drugs with friends at the Rattlebone Inn. They were a follow up story on a series of stories published by the News of the World, where members of staff at the News of the World had presented my father with a story about my “*habitual drinking and cannabis and cocaine use*”, to get an exclusive 'softer' story from the Palace's press office. This story was picked up in various later editions of other newspapers. I understand that Gerard Couzens is known in this litigation for his involvement in unlawful information gathering practices, and the habitual commissioning of private investigators, including Jonathan Stafford, TDI and JJ Services; and that at least two of his bylined articles have previously been admitted by MGN to have been the product of unlawful information gathering.

61. My solicitors have shown me a series of invoices relating to my Associate, and close friend, Guy Pelly, as well as people connected to the running of the Rattlebone Inn itself, that were commissioned by the Sunday Mirror at this time, presumably to try and find out more about the time Guy and I spent together at Rattlebone, and whether there had been any repercussions for him. The fact that the Defendant's journalists were trying to drag some of my friends into this and name and shame them sickens me. They weren't in the public eye, yet they were thrust into it just by being a friend to me. They became instant targets – a common theme for all my friends and girlfriends. Not only did I have the stress and worry about who I could trust with any personal details about myself, but I also knew I had to worry about anyone that I was close to becoming a target for the Defendant.

**33 “HARRY'S COCAINE ECSTASY AND GHB PARTIES” Mirror, 14 January 2002, Jane Kerr and Jeff Edwards**

62. Again, this article, which appeared on the front page of the Daily Mirror, was a follow up story on the series of stories published by the News of the World. This article takes the story further, and reports that my friends, or those I mixed with, were taking harder drugs, including ecstasy,



cocaine and GHB. I think the headline of this article is purposefully misleading as it seems to suggest that the parties referred to were held by or hosted by me, even though the article later reports that I had told my father that I had "*only smoked cannabis 'spliffs'*". What's notable to me in this article when reading it now are the quotes attributed to my father, including that he was "*worried sick*" and "*hugely relieved*" when I told him I had only used cannabis. My father didn't make any direct comment to the press, a statement was made by the Palace in response to the News of the World story. This was handled by a tight, small team internally, so it is not clear to me where the defendant's journalists could possibly have obtained these quotes from. The article also reports that "*Police began an investigation on the order of Prince Charles*", which I do not believe is true, so it makes me wonder with hindsight if the Defendant's journalists heard something they were not intended to and got the wrong end of the stick.

63. The article reports that I was now "*rarely allowed out without the presence of either [my] brother William, 19, [my] father or trusted friends*", although there's no explanation of how they learnt this information. There's also a quote from an unidentified 'family' source, that said I realised I had been a "*bloody fool*" and that I had been "*sucked into this set of people in their 20s*". I'm at a loss as to who would have said that. That's certainly not something I was saying to anyone.
64. This article, along with the NOTW coverage, had a huge impact on my life. Eton had a zero drugs policy in place, and I was extremely worried I was going to be expelled.
65. These articles were also written at a time when there had been an agreement between the press and the royal family, following the death of my mother, that my brother and I should be able to go through our education without constant scrutiny and interruption. It seemed to me there was never any let up in the press coverage of every detail of my childhood, by the Defendant's journalists and others.

**38 "Harry's sick with 'kissing disease' Mirror, 29 March 2002, Jane Kerr, Royal Reporter**

66. This article, which appeared on the front page of the Daily Mirror marked as an 'exclusive' and continued on page 4, revealed that I had contracted glandular fever. It reported that doctors had confirmed the diagnosis following a blood test some two weeks prior, that I would have symptoms for at least six weeks and that I had been teased by my friends and brother. A St James' Palace spokesperson is also quoted as confirming that a doctor had signed me off as fit enough to join my father and brother on a skiing trip.
67. The article is accurate in that I was diagnosed with glandular fever at this time, however I'm not sure how anyone outside of my immediate family knew this. I didn't tell anyone as I was ashamed of having contracted it. It's one of those infections that had a huge stigma attached to it when you're a teenager, which is exactly what the article itself is playing on, and the impact

on me was huge. Whenever anyone got it while we were at school, they would be teased endlessly whenever people knew, and this article made sure the whole country knew about my diagnosis. The whole school seemed to know, no one would go near me and I was a bit of a laughing stock. I felt miserable. The timing of the article was also horrible. As was reported, I was about to go skiing, which is a sociable activity so it couldn't have come at a worse time.

68. I do not believe that the Palace put this information out freely, I think they responded to information that was put to them. Glandular fever is not a life-threatening infection, there was no need for information about my medical condition to be publicly broadcast by the Defendant's journalists. This is an example of articles that seemed to be typecasting me into a particular role within the Royal Family. I was being made to look irresponsible or reckless. Even an infection that is common amongst teenagers was somehow being portrayed as something that was my fault, that I'd brought it on myself.

**42 "No Eton trifles for Harry, 18" Mirror, 16 September 2002, Jane Kerr**

69. This article, which appeared on page 7 of the Daily Mirror, reported details of the way I celebrated my 18<sup>th</sup> birthday, which included a low-profile lunch with my father and brother at home and details of the present my uncle had gifted me.

70. As I was turning 18, I was obliged to give an interview which was released to the press and many of the details were repeated in this article, although I am not sure of how much of it is reported here. This was obviously an ideal occasion for anyone listening into my messages to continue to do so in order to discover what additional private information could exclusively be reported.

**43 "Plot to rob the DNA of Harry" The People, 15 December 2002, Dean Rousewell**

71. This article, which was published on page 4 of the People and was written by Dean Rousewell, reported a plot to steal a sample of my DNA to test my parentage. I now understand that Dean Rousewell is well-known in this litigation as having used unlawful information gathering techniques himself, and also a habitual commissioner of private investigators, including JJ Services and Commercial & Legal Services.

72. Numerous newspapers had reported a rumour that my biological father was James Hewitt, a man my mother had a relationship with after I was born. At the time of this article and others similar to it, I wasn't actually aware that my mother hadn't met Major Hewitt until after I was born. This timeline is something I only learnt of in around 2014, although I now understand this was common knowledge amongst the Defendant's journalists. At the time, when I was 18 years old and had lost my mother just six years earlier, stories such as this felt very damaging and very real to me. They were hurtful, mean and cruel. I was always left questioning the motives

behind the stories. Were the newspapers keen to put doubt into the minds of the public so I might be ousted from the Royal Family?

73. Of particular concern to me in this article are the comments from the 'highly-placed royal source', which provided details of how the alleged plot would have been carried out and more importantly, that my DNA would be "*sold abroad*". I'm not sure from where, or who, these comments were obtained from because they feel like a huge security risk, effectively putting a price on my DNA for anyone who could obtain it. I firmly do not believe that these are details anyone from within the Palace would have shared, given the measures put in place for the security of all members of the Royal Family. My solicitors have also shown me three Contribution Request Payments to Gavin Burrows of IIG Europe Ltd for £5,000 (this one with the reference 'Prince Harry Special', and which was approved by the Editor, Neil Wallis), £1,000 and £250 which, given their dates, seem to relate to this article. I believe these show that MGN were using unlawful means of gathering information about me for this article.

**44 "*Plot to steal Harry DNA*" Mirror, 16 December 2002, Harry Arnold**

74. This article is a follow-on of the article detailed above, written a day later. This article elaborates on the money that could be obtained from obtaining my DNA and selling it on to a foreign newspaper. It reports that St James' Palace believed my DNA was to be offered "*to a foreign newspaper for tens of thousands of pounds*". Again, I do not believe this information would have been put into the public domain by anyone at the Palace, given the security risk this poses.

75. The article also reports that Spain was thought to be a strong possibility for the location of the 'honeytrap' to take place. Again, I'm not sure where the Defendant's journalist would have got this information from.

**47 "*HARRY – I'M GOING TO JOIN ARMY*" Sunday Mirror, 5 January 2003, Rupert Hamer**

76. This article published on page 9 of the Sunday Mirror and written by Rupert Hamer reveals details of private conversations I had with my father about my future, mainly that I didn't want to go to University and would rather join the Army. There's a surprising amount of accurate detail in the article, which includes the "*series of heart to hearts*" I had had with my father, that my father had wanted me to go to University as my brother had done and his feelings about my academic performance to date with my impending A-Level results, and my preference for joining the Army, over the Navy or RAF after taking a gap year. The option of joining the Welsh Guards was also something we discussed.

77. It wasn't just my father I was discussing this with. At the time, Mark Dyer, was like a mentor to me and we discussed a lot of options for my future career, as I really valued his opinion and

experience. I would have reported back to him on the conversations I'd had with my father, likely to have been on the phone and in voicemails as I was still at Eton where I boarded.

78. What strikes me about this article is the sheer number of 'quotes', allegedly coming from a 'senior aide', a 'royal source', 'friends' of mine and an 'associate' of my fathers. I certainly wasn't talking openly to my friends, or the Palace, about this kind of thing. It would have been only a few people that I trusted the most. Articles such as this were part of the bigger picture that the Defendant's journalists and other tabloids were constantly peddling, that I was not bright, struggling at school, a 'thicko'. I became convinced of that myself, and I knew others around me thought it. I was always worrying about how this preconception that people had from the tabloids would affect me. Because of this, I wasn't openly discussing my future plans - I wasn't always sure what was open to me, or how people would judge them, so the number of quotes in this article feels very suspicious to me. I wasn't talking to Harry Legge-Bourke about any of this, so I'm not sure why he's mentioned at all. That also feels suspicious to me.
79. I now understand that Rupert Hamer is well-known in this litigation as having been a habitual commissioner of private investigators, including JJ Services, Jonathan Stafford, Searchline, Commercial & Legal Services and TDI/ELI, and that at least articles bylined to him have previously been admitted by MGN to have been the product of UIG. My solicitor has informed me that despite the story identifying five different anonymous contributors, the Defendant only paid one person, which in view makes it very suspicious.
80. Articles such as this, which claimed to have comments from people close to my life, contributed to the general feeling of paranoia that I was so used to living with, a feeling of not being able to trust anybody, which I explained in more detail above. It's bad enough at any age, but looking back, 18 years old is so young to feel constantly suspicious of everyone around you. At various points, I doubted the loyalty of Tiggy, Harry Legge-Bourke and even Marko, who I really looked up to. My brother and I even stopped talking to Marko for a long period of time. It was upsetting to be questioning someone who played such an important role in my adolescence, and I felt as though I knew I could trust him but 'on the nose' information appearing in print, that only he knew about, convinced us otherwise. It was so conflicting. It's only now, realising what the Defendant's journalists were doing, and how they were getting their information, that I can see how much of my life was wasted on this paranoia. I've always heard people refer to my mother as paranoid, but she wasn't. She was fearful of what was actually happening to her and now I know that I was the same.

**50 "Matured' Harry is a godfather" The People, 20 April 2003, No byline**

81. This article, which appeared on page 25 of the People, reports that I was asked to be godfather to the son of Harry Legge-Bourke (the brother of my former nanny, Tiggy) and that Harry had already sounded the idea out with his wife, Iona who had agreed I was now "*adult enough to*

*cope*". It included my father's thoughts on the matter, which were attributed to a quote from a 'royal insider', It was reported that my father was "*keen*" on the idea, that he hoped it would be 'the making' of me, and that he wanted to increase my sense of duty.

82. It is true that I was asked to be a godfather, but again, I'm not sure where these comments would have come from. These kinds of private matters were not released in to the public domain freely, usually only revealed at a Christening if the press were covering it. I don't believe my father was widely discussing his views with anyone outside of the family. This is another article that contributes to the narrative set by the Defendant's journalists that I was irresponsible in some way, and that all my family were somehow desperately trying to find ways to keep me in check.

83. The quote from Harry Legge-Bourke also seems unusual to me. It reads as though he's been approached to confirm the information, because he is quoted as saying "*it's not really the done thing to talk about these things, but we expect Harry to be at the Christening*". If he's quoted as being unwilling to discuss the matter, where did the Defendant's journalist gain the information that Harry and his wife had discussed it, and how did they know her views on my suitability for the role? I don't think this makes sense. Over the years, Harry and I came to have a slightly difficult relationship, I ended up feeling quite suspicious of him, which was awkward as I was the godfather to one of his children. How much stories like this fed into the distrust I had towards him feels difficult to say.

84. My solicitor has shown me a TDI invoice commissioned by Claire Collins for "Pettifer/Bourke" (Charles Pettifer and Tiggy Legge-Bourke) for £85. It is dated 15 January 2002, 15 months before the article. It seems to me that it is therefore reasonable to assume that the People had the means to hack Tiggy and her husband as a result and likely continued to do so. I now believe that this is either how this article came about, or was a means to glean additional info for the article after it appeared elsewhere.

**51 "*HARRY TO LEAD CADET'S MARCH*" Mirror, 29 April 2003, No byline**

85. This article is a lead-in to the article detailed below, regarding the role of Parade Commander I was given at the Combined Cadet Force (CCF) tattoo at Eton.

**52 "*Prince is in charge at parade*" Mirror, 29 April 2003, Steve Atkinson**

86. This article, which appeared on page 10 of the Daily Mirror, contains details of the role of Parade Commander I was given at the CCF tattoo, which was held at Eton on 27 May 2003 (not on the 29<sup>th</sup> May as reported by the Defendant). This was quite a big deal for me, it's considered an honour to lead the cadets in the parade, and I was quite excited at the prospect.

87. My solicitors have shown me a statement made by the Palace, which was published on its website, a copy of which was provided by the Defendant. It's my recollection that announcements regarding matters such as this weren't commonplace. Even though I was proud to have been given the opportunity, I would not have been enthusiastic about any suggestions of publicising it for fear of a backlash, like I wasn't deserving or had been given the role because of who I am, rather than what I had achieved for myself. What seems unusual when reading this article is why the Defendant's journalists presented information taken from the Palace statement as coming from an Eton spokesman, as well as a spokesperson for myself, as though the information came from two separate places. I now understand that Mr Atkinson, who authored this article, is known in this litigation to have commissioned the private investigators, Commercial & Legal Services, and that at least one of his bylined articles has previously been admitted by MGN to have been the product of unlawful information gathering.

**53 "Harry's top Army mark." Mirror, 23 September 2003, No byline**

88. This short article, which appeared on page 10 of the Daily Mirror reported that I had gained "a top grade pass" after "sailing through" the commissioners board assessment for the Royal Military Academy at Sandhurst. Again, even though I was pleased with myself for my achievements, this is not something I wanted publicised, especially nothing around a 'top grade' pass for fear of a backlash.

89. My solicitors have drawn my attention to the Defendant's defence in respect of this article and the fact they have pointed to a statement from Clarence House the day before. As I have said earlier in this statement, announcements such as this were not commonplace, and often the Palace was reacting to stories that had been put to them, rather than them being proactive in releasing information. I can't now recall the specific circumstances around this article, and whether there were any discussions in this Institution about this. However, reading the article now, I still feel uncomfortable about my achievements being laid out in this way. It was an emotional rollercoaster. Just months before it was made to seem as though as wasn't clever enough to pass the A-Levels taken by millions of students across the country, and now I'm achieving the best grades for my choice of career. It feels like the tabloids were looking to find any way to build me up and then knock me down at every chance they had.

**54 "Harry is ready to quit Oz." Mirror, 27 September 2003, Jane Kerr, Royal Reporter**

90. This article, which appeared on page 7 of the Daily Mirror, written by Jane Kerr, with a photograph of me in a Stetson above it, reports that I was considering leaving Australia, where I was on a gap year, because of the level of press intrusion I was experiencing. The article includes a comment from a Palace spokesperson expressing concern and disappointment about the treatment I was experiencing. I do recall that the Palace issued a statement because

the situation in Australia was awful for me and there was supposed to be an agreement that once I had done the press call on arrival, I would be left to get on with my gap year in private. I was a teenager, and this made it clear that there was nowhere in the world, not even the Australian outback, where I wouldn't be hounded by the press or paparazzi.

91. The most interesting part of this article for me is the line that I was staying inside "*watching videos*" instead of working outside to avoid the camera crews. I'm not sure how they knew what I was doing inside, the whole purpose of me avoiding the cameras was to avoid everyone knowing what I was doing at all times. It was suffocating. I was only in Australia with a couple of UK bodyguards, so this is the kind of thing I would have moaned about over the phone and in voicemails.
92. My solicitors have shown me two Contribution Payment Requests to Frank Thorne which seem likely to relate to this article. The first dated 24 September for £100 with the description '*So that's where you got your hair style from Harry*' and the second dated 26 September for £450 with the description '*Prince Harry watch Hunter Valley (Ellis)*'. These suggest to me that MGN were using unlawful techniques to gather information about me, with the second payment seeming to me like the Defendant was paying to have me watched, especially with what I now know about Jane Kerr's instruction of Jonathan Stafford, as set out above.

**57 "*BORED HARRY IN POLO JAUNT.*" Sunday Mirror, 2 November 2003, David Rowe**

93. This article, published on page 8 of the Sunday Mirror, reports that after spending Christmas at home following the termination of my gap year in Australia, I would fly on to South America to play polo. My solicitors gave me a copy of this article to review, as I hadn't seen this exact story before. When I was abroad on my gap year, I wasn't seeing or hearing about specific articles, but was just being briefed on coverage more generally when it was necessary. There was always a security risk with the publication of my plans and movements. Every time I was getting off a plane or jumping in a car, I was looking in the rear-view mirror so to speak. I came to expect to be followed and papped by someone hiding in a bush somewhere. Everything felt as though I was under 24-hour surveillance.
94. What strikes me about this article is the quote from the 'royal aide' regarding my plans to get a "*proper job*" in the rest of my gap year before I joined Sandhurst. This quote states that this job will be "*something in line with [my] mother's sympathies – perhaps working with the deprived*". The timing of this quote is particularly interesting. I had already decided that I wanted to spend time assisting with aid projects in Africa, as my mother had done. Internally, there had been some discussion about my options by the time of this article. Mark Dyer had suggested Lesotho to me. It wasn't somewhere I'd heard of before, but he and I discussed it in quite some detail. I can't recall if we had taken this location for approval by the date of the article. Given my

experiences in Australia, these kind of details were on a strictly need to know basis, so I'm entirely unclear as to who the 'royal aide' publicising this kind of information would be.

95. My solicitors have shown me documentation that suggests that David Rowe, the journalist bylined on this article, had frequently commissioned private investigators known within this litigation for their involvement in unlawful information gathering activities, including ELI, TDI and Christine Hart. I have been advised that David Rowe was freelance when he wrote this and was paid £100 for the story. If the story was a straight lift from another newspaper why would the Defendant pay a freelance journalist £100 for it? It makes no sense. I would have thought MGN would have had one of their own journalists lift it 'in house' to save themselves money. However, if he was paid £100, he must have provided something in return for that money and my guess is that it was for unlawfully obtained private information about me.

**58 "*BEACH BUM HARRY.*" Mirror, 16 December 2003, Jane Kerr, Royal Reporter**

96. This article, which appeared on page 19 of the Daily Mirror, written by Jane Kerr and accompanied by various photographs of me in the sea, reports that after leaving the ranch where I'd undertaken work on my gap year, I had gone to the beach resort of Noosa with some friends. I remember this day so clearly, we were staying in a house and, after visiting Steve Irwin's Crocodile Zoo in the morning, we had gone out on to the beach in front of the house in the afternoon. It was a public beach, but not busy or popular so I'm unclear how anyone had known we were there, to be in the right place at the right time to take photographs. I wasn't aware of anyone taking photographs at the time.

97. I only learnt recently that the Queen had asked one of her Assistant Private Secretaries to fly out to Noosa and take a house down the road from where I was staying, without me knowing. She was concerned about the extent of the coverage of my trip and wanted someone I knew to be nearby, in case I needed support.

**59 "*WILLS.. Seeing Burrell is only way to stop him selling more Diana secrets HARRY No.. Burrell's a..*" The People, 28 December 2003, Rachael Bletchly**

98. This article, which appeared on pages 3 and 4 of the People, reveals details of a private disagreement between myself and my brother regarding a proposed meeting with Paul Burrell, our mother's former butler. I now understand that Rachael Bletchly is well-known in this litigation as having been a habitual commissioner of private investigators, including JJ Services, Searchline, Commercial and Legal Services and ELI, and that at least two of her bylined articles have previously been admitted by MGN to have been the product of unlawful information gathering. The article accurately sets out the position that my brother was open to fixing a meeting with Paul to discuss his ongoing exposés about our mother, however I had made up



my mind about the kind of person I thought Paul was and was firmly against meeting him at this point in my life. To the best of my recollection, I do not believe a meeting went ahead in 2003.

99. Both my brother and I had very strong feelings about how indiscrete Paul had proven to be with the way he had sold our mother's possessions and how he had given numerous interviews about her. We firmly believed that she would have expected some privacy in death, especially from someone she had trusted, and we were so upset at the way he was behaving – I didn't want to hear his reasons for it. Therefore, our disagreement over to how to handle the situation going forward was not something I wanted splashed across the Defendant's newspapers, and I have no idea how the Defendant's journalists obtained the information within the article. A 'senior Royal source' is quoted within the article, reflecting my exact private feelings including that I was "*dead against any meeting*" and that a meeting would be "*pandering to Burrell's attention-seeking and self-interest*". I also would have used the phrase "*two-face s\*\*\**", as is reported and believe this could have been lifted directly from a voicemail I had left.

**60 "*Polo trip next up for Harry.*" Mirror, 31 December 2003, Adrian Shaw**

100. This article appeared on page 9 of the Daily Mirror and carried a small, close-up photograph of me. As with article 57 that I have referred to above, this article contains details of my plans to spend some of my gap year in Argentina playing polo. Again, I'm not sure where the quotes from the 'source' would have come from. Details of private meeting I was to have with my father, and his reaction to my plans, was not the kind of information that was intended to be in the public domain due the security implications.

101. However, my solicitors have shown me documentation that suggests Adrian Shaw , the author of the article, was regular user of private investigators (known to have undertaken unlawful information gathering activities) such as JJ Services and Commercial & Legal Services.

**63 "*I'M SO SORRY PAPA*" Mirror, 23 October 2004, Gary Jones**

102. This article was published on page 7 of the Daily Mirror and contained a large photograph of me holding on to the arm of what I believe is one of my PPOs, Ieuan Jones, as I try to avoid the swarming cameras and blinding flashes. It reports that I had apologised to my father following an incident with a paparazzi outside a nightclub. It was written by Gary Jones, the Investigations Editor of the Daily Mirror, who I understand is well known in this litigation for being a prolific commissioner of private investigators known to be involved in phone-hacking and blagging of private information. These private investigators included Southern Investigations, JJ Services, Jonathan Stafford, Commercial & Legal Services and ELI

103. The article contains a quote from a spokesperson, allegedly on my behalf, which states that I had already spoken to my father “*but any conversation will remain private*”. However, it goes on to say detail that my father was “*sympathetic*” to the situation I was facing with the press, that I was apologetic and that I also apologised to my security officers for putting them in a difficult position. It also states that I was “*sensitive*” following accusations that I had been helped to pass one of my A-Levels by a teacher.
104. This was a particularly challenging period of my youth. I had just turned 20, and like most 20 year-olds, I wanted to go out and socialise. However, everywhere I went, the paparazzi seemed to turn up even though efforts were always being made to conceal where I was going. There was often up to 15 men waiting outside with huge cameras. It was like being swarmed by a rabid mob. Most small clubs and bars didn’t have back entrances, and if they did, the paparazzi would find out and cover them too. Therefore, the advice of my PPOs was that I had to walk out, hold my head high and just try to push past and get in the car. On rare occasions I even hid in the boot. When this incident occurred, my car was parked across the road and I had to get from the club door, across the pavement, across the road and around to the far side of the car, into the passenger side. The paparazzi had me surrounded, their arms in my face. They don’t take photographs like you’d expect, it’s just their arms stretched out pushing a button, taking hundreds of photographs all at once with the flash in your face. I couldn’t even see where I was going. As I reached the car, I could hear taunting, I was being egged on for a reaction, knowing I’d been out and had a few drinks. A camera hit me across my nose as I was opening the door, I turned, grabbed the nearest camera to me and shoved it backwards.
105. The article is accurate in that it reports I was taken back to Clarence House, then on to see a doctor. Everyone in the family, including my father, was sympathetic to the position I was in, there was no respite, never an ‘off’ moment when I was allowed to go out with my friends without the intrusion and harassment. It was also true that I was finding the media intrusion particularly difficult, or as the Defendant’s journalists put it – “*sensitive*” – because of the heightened attention due to reports surrounding my A-Levels and the employment tribunal hearing of my former teacher. I felt like I was under constant scrutiny although I rarely spoke about this, only to those closest to me, so I’m not sure how the Defendant’s journalists could have legitimately obtained that information.

**64 “HARRY IS A CHELSY FAN” Mirror, 29 November 2004, Anthony Harwood in Lobos**

106. This article was published on page 7 of the Daily Mirror, written by Anthony Harwood and was labelled as an ‘exclusive’. I understand that Mr Harwood is well known in this litigation for being a prolific commissioner of (and authoriser of payments to) private investigators, known to be involved in phone-hacking and blagging of private information. These private investigators included LRI, Jonathan Stafford/Newsreel, Commercial & Legal Services, Tillen & Dove,

Capitol Inquiries, and Benji Pell. The article featured a large photograph taken of Chelsy Davy, who I had started dating. She went on to be my long-term girlfriend. This paparazzi-style photograph was taken without Chelsy's consent. The article reports that I had spent time with Chelsy when I was in Argentina, that we had stayed together at the El Remanso ranch, including a quote from a construction worker identified as 'Ramon' who had allegedly seen us together in Lobos, and states I had known Chelsy from some time, as she had attended a school near Highgrove.

107. What's really interesting about this article is that I actually had no idea that Chelsy was going to be joining me in Lobos. I had spent some time with her in Botswana and we had grown close. Mark Dyer was in Argentina with me, and had made arrangements with Chelsy, over the phone, by voicemail and text message, for her to come and surprise me. No one else knew of the plan, so I can't understand how any of the media had known where we were, or who she was. As I mentioned above, I was extremely guarded and took all possible steps to keep as much of my life private as possible, however it felt like I was under constant surveillance, hunted by the media – and this is just another example of this.

108. I also remember Chelsy telling me about this photograph. Someone just walked up to her in the street, confronting her about our relationship. You can see in her face that she's petrified, she was only 19 at the time and had never experienced anything like it, yet the photo was used as some kind of trophy that the Defendant had managed to find her. This wasn't the only time this happened.

109. My solicitors have shown me a number of Contribution Payment Requests that appear to relate to this article in the days leading up to it. The first, a payment to Gerard Cousens for £150 with the description 'Prince Harry in Argentina' dated 25 November 2004. The second, a payment to Big Pictures for £250 with the description 'Prince Harry on motorbike pg7-lan'. The third, again a payment to Gerard Cousens in the sum of £150 with the description 'Prince Harry in Argentina'. There are then 3 payments dated 28 November 2004, the day prior to publication of the article, the first to Jeff Rayner Photographer for \$470 with the description '27/11/04 Prince Harry', and the second and third payments to Gerard Cousens of TAG News Media for £200 and £150 respectively, with the descriptions 'Harry Assist' and 'Harry Argentina asst'. There is also a payment to Mike Behr for £250 with the description '2 day assist Prince Harry' dated 29 November 2004, the day of publication and another on 30 November 2004, the day after publication to Mike Behr for £150 with the description 'Cape Town inquiry on Harry girl'.

110. The volume of enquiries is incredible. It's so shocking the Defendant commissioned so many lines of enquiries into me at the same time. It is obvious they were doing everything in their power to glean my private information while I was starting a serious relationship.

**66 “WHEN HARRY MET DADDY.. the biggest danger to wildlife in Africa” Mirror, Graham Brough and Jane Kerr, Royal Reporter, 13 December 2004**

111. This article, which appeared on page 11 of the Daily Mirror written by Jane Kerr and Graham Brough, revealed details of me meeting Chelsy’s family for the first time. Again, I am aware of the documentation that suggests Jane Kerr had previously instructed Jonathan Stafford but I now also understand that Graham Brough is well known in this litigation for being a commissioner of private investigators known to be involved in phone-hacking and blagging of private information. These private investigators included JJ Services, Jonathan Stafford, Commercial & Legal Services, Research Associates, Hogan International and ELI.
112. The article published, as an ‘exclusive’, features two photographs of hunters, lifted from her father’s safari company website, a large close-up photograph of Chelsy, who is not looking at the camera and looks quite concerned, along with a smaller photograph of me. It reports that I was introduced to Chelsy’s father on the previous day, that I was enjoying a holiday with Chelsy in Mozambique and that we had flown over to the island of Bazaruto to meet other members of her family, including her mother Beverly, and brother Sean. It also states I would be flying back to Britain on 19 December.
113. I am at a complete loss as to how these details were obtained. As I have said previously, details of my travel plans, including dates I would be flying, were not released by the Palace for security reasons, yet the specific date I would return to Britain was published days in advance. It was also true that I met Chelsy’s family for the first time in Mozambique. The article itself even suggests that the Defendant’s journalists had contacted the Palace to confirm their story and was told by Clarence House that matters of my relationship were “private”.
114. My solicitors have shown to me a series of four Contribution Request Payments made to Big Pictures, which they conclude relate to this article. One payment is for £300 with the description ‘Prince Harry-day 1’ dated 10 December 2004, another for £300 with the description ‘Prince Harry’ dated 12 December 2004 and two further payments, both for £300 and dated 13 December 2004, the date of the article. I now believe this is how the Defendant obtained the details reported.
115. What is also interesting about this article is the small, ‘off the cuff’ mention of the fact Chelsy and I had been dating for eight months. It was less than a month since Chelsy’s name had been put into the public domain by the tabloids, and we had managed to keep our relationship a secret for a good few months before it was exposed (without our consent). What’s clear to me is that the Defendant’s journalists knew far more than they put into the public domain and didn’t want to reveal too much of their hand for fear of exposing the unlawful ways they were really obtaining this kind of personal and private information.

**68 “HARRY’S GIRL “TO DUMP HIM” Mirror, 15 January 2005, Jane Kerr, Royal Reporter; and**

**69 “CHELSY IS NOT HAPPY” Mirror, 15 January 2005, Jane Kerr, Royal Reporter, and Richard Smith**

116. The first article, numbered 68, is front page headline of the Daily Mirror, which leads into the article numbered 69, which appeared on pages 4 and 5 of the Daily Mirror. Marked as an ‘exclusive’, written by Jane Kerr with the main article also contributed to by Richard Smith, the article reveals that I was “*about to be dumped*” by Chelsy. Along with what I now know about Jane Kerr, I also understand Richard Smith is well-known in this litigation for being a regular commissioner of private investigators Commercial & Legal Services. There was a lot of press coverage of me at the time, as I had attended a fancy dress party and photographs had been sold to the press by an attendee of the party. However, this article by the Defendant has a different focus. It reported that Chelsy was “*furious*” and had given me a “*tongue-lashing down the phone*” following allegations that I had been flirting with a brunette at the party. The article also reports that Chelsy had phoned me “*at [my] father’s Highgrove home*”. The article contains several quotes from ‘friends’ or other ‘partygoers’, but the details about our telephone communications are not attributed to anyone, so how could the Defendant’s journalists know about this.

117. I don’t remember if Chelsy and I did argue about the party. Given we were based in different countries, a lot of our relationship was conducted over the telephone, so I know I would have spoken to her a lot over this time because it was a challenging period for me but I don’t recall her reaction. I had been immature, I hadn’t really thought about my actions and I had made a stupid decision – and my mistakes were being played out publicly. By this stage, Chelsy was already extremely guarded about our relationship and our circle of friends who we trusted with information about us had shrank considerably. Every time these kinds of stories were published, there was a strain put on our relationship, we started to distrust everyone around us. In hindsight, knowing the extent to which MGN journalists were targeting us and intercepting our communications, we probably lost friends needlessly, and put a lot of pressure on ourselves to be secretive and deal with problems without support, out of the sense of paranoia that articles like this created.

118. My solicitors have shown me call data showing calls from the Defendant to the mobile phone of my Associate, Guy Pelly. It appears that someone working for MGN tried to call Guy on 13 January 2005, two days prior to the publication of these articles (which was the day The Sun had first published the details of the party). The duration of the call was ‘null’ and I have been told that this is indicative to hacking as it could be the first limb of a ‘double tap’ call. It seems obvious to me that the Defendant’s journalists were digging round my Associates to gain private information about me.

119. I have also been shown an email from Ms Kerr to Mr Behr asking for reaction to the 'Harry with other girl' allegation and enclosing a draft story. What is notable in these drafts is the removal of references to the length of the calls. I believe this was intentional to avoid arousing too much suspicion.

**70 “CHELSHOCKED” The People, 23 January 2005, Dean Rousewell, Royal Editor**

120. This article was published on page 24 of The People, written by Dean Rousewell and marked as a 'Royal Exclusive'. It revealed details of a highly private disagreement my father and I had about my relationship with Chelsy. The article reported that I had “*slammed the phone down*” on my father and included a quote from a 'senior aide' that described me as being “*incandescent*” when my father described my relationship as “*puppy love*” and that I had “*exploded*”, telling my father that he had no right to lecture me on morals, and that my father had been shocked by my outburst. It reported I had been banned from seeing Chelsy, who was in Cape Town.

121. Again, I don't know how the Defendant's journalists obtained any of this information. Any disagreements between me and my father were private. However, I would have spoken to Chelsy about this, as it impacted on when we could see each other. This kind of article just perpetuated feelings of distrust, within all of my relationships. Nothing seemed to be off limits to the Defendant's journalists.

122. I have seen that there were 3 suspicious call made to Paddy the day prior to the article being published. Given this article involves details regarding communications between me and my father, I think this is highly suspicious. This shows me that MGN were digging around my associates to unlawfully gather my private information. There really was no respite from the press intrusion.

**71 – “YOU DID WHAT!”, Sunday Mirror, 6 February 2005, Simon Wright**

123. This article, which appeared on page 5 of the Sunday Mirror, included a photograph of me in a cap, a picture of the home of Richard Meade where I had attended a party, and a full-page photograph of a George Springfield and Francesca Grievson, who had also been at the same party. It is alleged by the Defendant's journalist that Mr Springfield (who attended the party as a guest of his girlfriend and was not known to me) was the source of the photographs of me at the party which had been sold to a rival newspaper. The article reports that the Defendant's journalists had confronted him about being the source of the leaked photographs, and that they had also contacted his mother for her comment. Mr Springfield “*categorically denied*” being responsible and threatened legal action, as is reported at the end of the article.

124. As mentioned above, there had been extensive coverage of the party after the photographs were leaked. I knew I had been stupid and I was deeply apologetic and regretful. I was suspicious of everyone around me, wondering who was prepared to sell photographs or details of my life. I was always careful about who I trusted. However, reading Mr Springfield's strong denials in this article makes me wonder, with the benefit of hindsight, about how they identified him as being the source of the photos. My solicitors have shown me a number of private investigator invoices, sent to the Sunday Mirror firstly from ELI (an agency known to have undertaken unlawful information gathering activities) that relate to Mr Springfield, and Ms Grievson, and secondly from Commercial & Legal Services on Mr Springfield and on the Meade family. I understand that Simon Wright was a prolific commissioner of private investigators including ELI. This all makes me extremely uncomfortable and shows the lengths the Defendant's journalists were prepared to go to for a story.

125. This article further reported on the ongoing strain in my relationship with my father, stating I was "*sulking like a teenager*" after he "*grounded me*", that I was being forced to do a "*dull desk job*" and help out on the farm near Highgrove by cleaning out the pig sties and helping with the cattle. It also includes a quote from a 'royal source' that said I had been told to "*knuckle down*". There were obviously consequences within my family, which I fully accepted but I know my father was particularly unhappy with the poor judgment I had shown. However, as is reported in the article, the Palace had already issued an apology on my behalf, and details of how my father thought fit to punish me for my actions were not part of that. Given the extensive digging the Defendant's journalists were prepared to do into the source of the photographs, I think it's highly likely that they had done the same to try and find out more about what was happening to me and how I felt about it.

126. My solicitors have also shown me 2 Contribution Request Payments dated 6 February 2006, the date of publication, which relate to this article. One to Jeremy Durkin with the description 'Prince Harry' for £72.48 and another to Tim Graham with the description 'Prince Harry front page' for £100. The call data I have been shown for Paddy Haverson shows 2 suspicious calls made by MGN to him in February 2005 and a further suspicious call made on 4 February 2005, which given the story contains an angle on mine and my father's relationship no longer seems surprising. These give me no doubt that MGN were using unlawful techniques to gather private information about me.

**74 "WHO DARES WINDSORS" Mirror, 4 March 2005, Jane Kerr, Royal Reporter, and Chris Hughes**

127. This article, written by Jane Kerr and Chris Hughes, appeared on page 9 of the Daily Mirror, with a small photograph of both myself and my brother. Along with what I understand about the activities of Jane Kerr, I understand that her co-author, Chris Hughes was a regular commissioner of private investigators including Jonathan Stafford, Searchline, and Severnside.

The article reported the appointment of Jamie Lowther-Pinkerton as the first private secretary to me and my brother. The Palace did make an announcement regarding his appointment and the article itself reports that we helped choose him for the role and that we got on well with him, which we did.

128. There's extensive detail in the article about Jamie, including his role as a former SAS commando, some of his experiences from his 20-year career in the army and the fact he has three children of his own. There are also several quotes from unidentified 'friends', and 'ex-colleagues' of Jamie's. Given what I now know about the Defendant's journalists' activities, these all feel very suspicious to me, especially as I have seen the call data disclosed by the Defendant relating to Jamie. This includes a call being made to him the day before this article was published. Again, this now seems like the Defendant's journalists were digging around for more private information to publish.

**76 "TONY PARSONS: PRINCE Charles" Mirror, 14 March 2005, Tony Parsons**

129. My solicitors have advised me that this short article, written by Tony Parsons and appearing in his column on page 23 of the Daily Mirror, was included as one of the 140 articles identified by me in my Particulars of Claim in error. While I am unclear as to how information about a private conversation between me and my father about my relationship had been obtained by the News of the World, who had published the story a day prior, I accept that Mr Parsons was commenting upon that.

**79 "CHELSY'S GAP EIIR" The People, 24 April 2005, Dean Rousewell, Royal Editor**

130. This article, published on pages 24 and 25 of The People, and written by Deans Rousewell, features a large photograph of me smiling, and a separate photograph of Chelsy laughing. Marked as an 'exclusive', it reveals that Chelsy would take a year out from her studies to be able to spend more time in England, as I was just about to enrol at Sandhurst. I now understand that Dean Rousewell is well-known in this litigation as having used unlawful information gathering techniques himself, and also a habitual commissioner of private investigators, including JJ Services and Commercial & Legal Services. The article includes a quote from an 'insider', which states that I was "*spending hours on the phone to Chelsy*", that I was finding the prolonged periods apart difficult as I couldn't concentrate or relax, and that I was quite emotional. The article also reported that we had just had an "*intimate break...at a hideaway South African hunting lodge*" and that Chelsy had visited me in England in February for a "*hush-hush*" holiday. It also says that Chelsy had spoken to a passenger on the plane and said she "*couldn't wait to see me*".

131. I find the level of detail in this article so disturbing. Chelsy had no interest in being involved in public life, she found the press intrusion as difficult as I did, and it was the main



factor in why we decided to end our relationship. I don't believe she would have been freely chatting to passengers on the plane, she wanted to keep a low profile. The fact those comments are attributed to her like that makes me so angry. From the very beginning we took all possible steps to keep our plans a secret and would not have been telling many people about any gap year plans, or holidays. The Defendant's journalists even seem to acknowledge this by describing her February trip as "*hush-hush*" and our trip to South Africa as being in a "*hideaway*". If this is the case, how did they know? Reading these articles with the benefit of hindsight, I realise how brazen they were about the information they had managed to get.

132. The reference to me and Chelsy spending "*hours on the phone*" is just another example. I wasn't telling friends that. It wasn't obvious to anyone else, as I wasn't making these calls in public. Who is this unidentified insider that is quoted? It seems to me that they must have obtained copies of our phone records and just seen the volume and length of our calls.

133. I have been shown a Contribution Payment Request to Ferrari Press Agency Ltd (who are known to have employed unlawful information gathering techniques) for £600 with the description 'Chelsy gap year'. The call data relating to Paddy Haverson also shows 4 calls made by MGN journalists to Paddy the day after this article was published which I also think is suspicious given Paddy was across our operational and security arrangements.

**80A "HARRY CARRY!" The People, 15 May 2005, Dean Rousewell, Royal Editor**

134. This article was published as a two-page spread on pages 6 and 7 of The People and featured a large photograph of me in fatigues, along with a smaller photograph of other cadets out on an exercise. It is marked as an 'exclusive', written by Dean Rousewell. I now understand that Dean Rousewell is well-known in this litigation as having used unlawful information gathering techniques himself, and also a habitual commissioner of private investigators, including JJ Services and Commercial & Legal Services. The article reports that I was being let off daily marches at Sandhurst due to a longstanding injury to my knee, and included quotes from 'insiders' at Sandhurst about the injury and treatment, and the way that the other cadets felt about me receiving what they perceived to be special treatment. As I mentioned above, I was not going around freely discussing any medical issues or injuries that I had. I was almost conditioned to feel guarded at this point in my life, worrying I couldn't trust anyone for fear that it would end up splashed across the tabloids.

135. The second part of the article reveals that I was using the academy's computers for 15 minutes each day to exchange emails with Chelsy and includes quote from another unidentified source about how I always came back with a smile on my face and that I seemed very fond of Chelsy. I'd only been at Sandhurst a couple of weeks by this point, and while I can't remember the specifics of how often I was speaking to Chelsy over email at this time, I wasn't sharing this information with my colleagues - who I'd only just met- least of all because that kind of thing

would have made me seem soft, but also because me and Chelsy were so protective of our relationship and wanted people to know as little as possible for fear of 'leaks'.

136. My solicitors have shown me a Contributions Request Payment to John Ross dated 15 May 2005 for £150 which giving its timing appears to relate to this article. I have also been shown call data relating to Paddy Haverson, showing a suspicious call made to him the day prior to the publication of this article. As such, I believe that the information in this article came from unlawful information gathering.

**93 "CHEL SHOCKED" The People, 9 April 2006, Dean Rousewell, Royal Editor**

137. This article, which appeared on page 11 of The People, written by Dean Rousewell, is marked as an 'exclusive' and has a large photograph of Chelsy looking unhappy, along with a small photograph of me with my hand over my mouth. As I have said above, I understand Dwan Rousewell is well-known within this litigation. The article reveals that Chelsy "*blew her top*" after I had been on a night out with cadets from Sandhurst and we had visited Spearmint Rhino. It contains the exact details of our arrival time, where we had been before and that one of our group wasn't allowed in for being too tipsy.

138. The article reports that Chelsy had "*let rip in a string of phone calls*" and includes a comment from a 'highly placed source' that she had gone "*berserk*", had slammed the phone down because she was too angry, and then called back to scream at me for half an hour. To the best of my recollection, I don't think Chelsy did go mad about me going there. We did speak about it over the phone, but I promised her that I hadn't had a lap dance and stayed with the three other cadets that had girlfriends. The detail about the timing and length of the calls is so specific. With hindsight, it seems likely to me that the Defendant's journalists had access to one of our phone records and put two and two together to make a story.

139. The article also states that Chelsy and I were to reunite in Mozambique, which is described in the article as a make-or-break holiday. Again, details of my travel arrangements were always intended to be confidential for security reasons, so I'm unsure how the Defendant's journalist would know this, especially in advance. There's also a quote from a "Royal insider" which says I was feeling torn, worrying that Chelsy was cooling on our relationship. At the time, as the article itself states, I was at Sandhurst, not staying in any of my family's residences. This is not the kind of thing I'd be discussing with my father or anyone else at the Palace, so who could this "Royal insider" be. I might have expressed some concerns to Chelsy herself over the phone or voicemail, or perhaps a close friend, but this quote seems extremely suspicious to me. Similarly, the quote from 'another source' about how this could be the 'final straw' for Chelsy is also suspicious. As stated, Chelsy and I were not widely discussing our relationship.

140. My solicitors have shown me three Contribution Request Payments relating to this article, all of which are the same date as publication. There is a payment to Big pictures for £150 with the description 'Prince Harry pg 7', a payment to Barry Keevins for £100 with the description 'Harry and lap dancer' and a payment to Ferarri Press Agency Ltd for £300 with the description 'Chelsey lap dancing anger'. Given the private details in the article, and the very specific details about my phone activity, I find these payments particularly suspicious.

**97 "HARRY IN SPACE" The Mirror, 24 July 2006, Stephen Moyes**

141. This article, which was published on page 23 of the Daily Mirror, was marked as an 'exclusive'. It was written by Stephen Moyes who I understand is known in this litigation for his use of the private investigators Commercial and Legal Services. It appeared on the left-hand side of the page, alongside a shorter story about Chelsy watching me play polo. The article claims to exclusively reveal that I had been approached to join one of the first commercial space flights.

142. What's interesting about this article is the reference to my brother and I discussing this. There were conversations about this at the time, obviously I was excited at the prospect, but how did the Defendant's journalists know who I'd spoken to about it?

143. I have also been shown by my solicitors, a Contributions Payment Request to Big Pictures for £1,000 with the description '*Prince Harry pg23-Ian*' which I believe relates to this article. I have also been shown call data relating to my Associate, Jamie Murray-Wells, who as I explain above, was close to both my brother and I. There was a call made from someone at MGN to Jamie on 21 July 2006, which seems suspicious. It's appalling to see the reach of the Defendant's activities and how much they were prepared to spend to gather information and/or photographs of me.

**99 "CHELSY IN GUN TERROR" The People, 10 September 2006, Dean Rousewell, Royal Editor**

144. This article, which appeared on page 18 of The People, written by Dean Rousewell, reported that Chelsy had been robbed at gunpoint at a wine bar in Cape Town. It includes a large photograph of Chelsy, but I don't think from the night itself. Chelsy didn't seem be the target of the attack, she was just in the wrong place at the wrong time, but it was an extremely scary experience for her, and for me as her partner thousands of miles away. Things like this reiterated the distance between us, living in different countries, and we certainly spoke a lot over the phone, and exchanged voicemails about this incident.

**106 "I'M RARIN' TO GO" Mirror, 23 February 2007, Chris Hughes, Security Correspondent**

145. This article, which appeared on page 14 of the Daily Mirror and was written by Chris Hughes, was a follow up from the 'exclusive' Daily Mirror article published six days prior that revealed there were plans for me to serve in Iraq. For obvious reasons, any plans for me and my regiment were intended to be highly confidential, so no coverage of this was welcome. This article reports on comments from Clarence House, which again, I believe were responsive after the Defendant's journalists had exposed the details of the tour.

146. I understand that Chris Hughes was a regular commissioner of private investigators including Jonathan Stafford, Searchline, and Severnside. My solicitors have shown to me two Private Investigator invoices from Globalnet News to the Daily Mirror dated 8 February 2007 and 14 February 2007, which I can only conclude relate to this story given how guarded the information was. The call data relating to Paddy Haverson also shows a suspicious call made to him from someone at MGN, on the same day this article was published. It all now makes sense to me. I had no chance to serve without it being public knowledge, as the Defendant's journalists were using unlawful means to obtain this highly sensitive information and had no regard as to how it would impact me.

**107 "HARRY..DON'T BE A HERO!" The People, 4 March 2007, Dean Rousewell, Royal Editor**

147. This article, which was published on page 31 of The People, was written by Dean Rousewell and marked as a 'Royal exclusive'. It featured a headshot of me in my fatigues, along with a small photograph of Chelsy. The article reports on Chelsy's feelings about me going to serve in Iraq, stating she had "*begged [me] not to be a hero*". It states that Chelsy had made 12 phone calls to be in an hour while I was on a night out and that I had stepped outside the bar in South Kensington to take each call, to avoid embarrassment in front of my friends. It also includes two quotes from a 'Palace source' that "*revealed*" that Chelsy had kept ringing me because she thought I was being "*too blasé*" about my safety and that she "*was just worried and wishes [I] wasn't going to Iraq at all*".

148. At the time of this article, I really did hope I was going to be deployed to Iraq and I was on standby, along with the rest of my regiment. I felt like it was my calling, I had trained for it, I wanted to be there with my men. In the end, the press coverage and speculation was so extensive, I was unable to go because it had become too much of a security risk for me and them. A target had been put on my head, which would endanger those in my regiment, as well as me. I was devastated. However, when the tour was still a possibility, Chelsy was extremely worried and we discussed it a lot. There was no changing my mind, I was determined to serve. I don't remember specific conversations, but she definitely challenged my motives, questioned our relationship and expressed concern. She was undoubtedly upset. As we were based in different countries, a lot of this would have been in calls and voicemails.

149. The whole article feels highly suspicious to me from my knowledge, more so given what I now know about the reputation of Dean Rouswell in this litigation. I'm not even sure it makes sense, I think it contradicts itself. How would anyone, even the friends that I was out with, know that Chelsy had called me exactly 12 times. Especially, if I was taking the calls away from them for fear of embarrassment. If I wasn't comfortable with my friends knowing these details, why would I come back and discuss this with anyone at the Palace, especially in the detail that's reflected in the quotes in the article? I wouldn't have done that anyway, as I was so guarded about who I spoke to about Chelsy and the prospect of me going out to serve, because of the security risk.

150. With the benefit of hindsight, I think the Defendant's journalists must have obtained either mine or Chelsy's call data, and listened to our private messages, to make the kind of comments in this article. My solicitors have shown me a Contribution Payment Request paid to Julian Gavaghan for £500, which has the description "Harry – don't be a hero" – the title of the article. Seeing examples such as this inevitably makes me wonder what else they heard and decided was too risky to print for fear of exposing themselves. I was furious when I was pulled out of the plans for Iraq and was aware of the role the press coverage had played in this. This article once more shows it's not my career and professional life that the Defendant's journalists were interested in, but very private, raw emotions between me and my partner. It's so violating.

151. The Paddy Haverson call data shows a call made by MGN to him on 3 March 2007, the day prior to this article being published. As I've said previously, it is obvious MGN were trying to gather information about me using unlawful methods especially given what Paddy knew about my movements operationally.

**111. "JUST HARRY UP!" Mirror, 7 September 2007, Victoria Ward**

152. This short article, which was published on page 9 of the Daily Mirror, has several photographs of me and Chelsy at Heathrow airport. It includes photographs of Chelsy both before and after airport security, after she had just landed in London from South Africa. It reports that I had gone to the wrong terminal to collect Chelsy, which meant I was an hour late to meet her.

153. This story is true. My PPO had got the terminal wrong, and I was late to meet Chelsy. I wasn't worried about her reaction, but I was worried about her safety for the reasons I discuss earlier in this statement. I knew if she had come through customs, she would have to wait in the public arrivals area and would get swarmed by the paparazzi who always seemed to know our travel plans, another 'coincidence' I could never understand given the security measures in place and the fact we kept these details to ourselves as far as possible. Although, according to the caption of the photographs in the article, photographs of her were taken whilst she was still moving through passport control and security. I don't understand how. When I arrived, we

ended up swarmed by photographers, trying to go up the stairs with some in front of us, some of them behind us, following and bumping into us all the way to the car. It was suffocating, in the airport you're just trapped and all that after a long flight. I'm not even sure how the Defendant's journalists would have known I was at the wrong terminal as I hadn't left the car, so no one would have seen me, but I probably would have said this to Mark Dyer over the phone or in a voicemail.

**112. "DAVY STATED!" The People, 16 September 2007, Dean Rousewell, Royal Editor**

154. This article, which was published on page 9 of The People, was written by Dean Rousewell and marked as a 'Royal exclusive'. It included a large photograph of me, and on the other side of the page, a large photograph of Chelsy, both of us looking quite serious. It reported that The People was able to reveal that our relationship was in crisis after a "*string of bitter bust-ups*". It went on to state that Chelsy and I had three "*monumental*" rows, with a breakdown of the details of each of the purported rows. The article included an extensive quote from a 'Palace source' about my relationship with Chelsy, and her feelings, along with a quote from a 'fellow student' of Chelsy's from her university in Cape Town.

155. I can't recall the specific rows that are detailed within this article, but I do know that this was a particularly strained time for us as a couple. We did break up a couple of times during the course of our relationship, and this article may have been written around the time of one of these breakups, but I can't be sure. Chelsy had moved to England and we had hoped we would be able to see each other more, but my military commitments meant I actually did not have much time to talk to her, let alone see her. She'd moved her whole life, but I was working from 5am until around 9pm. Even her being based in Leeds felt difficult, especially as I was always worried about being followed and photographed, so I was reluctant to travel up there. There were a lot of difficult and testy conversations about this.

156. This article is just needlessly intrusive into mine and Chelsy's personal life, and she in particular did not deserve to have these details published to the world especially when she had moved country and was about to start a degree. She was only in her early twenties, needed to make new friends, yet the world knew these details of her life, and the stories were never flattering to her, making it look like she was putting up with being "*neglected*" by me. This kind of article just added to the existing strains on our relationship, while no doubt entertaining those that wrote it and read it. Our lives were entertainment for them.

157. I really cannot understand how the Defendant's journalists obtained such specific details for this article, however given what I know about Dean Rousewell's activities, I find it very suspicious. I certainly wasn't discussing our relationship in these kind of details with anyone inside the Palace. Given the hours I was working at the time, it's likely Chelsy and I did

exchange voicemails even more often than normal, so I now believe that this information must have come from the hacking of our voicemails.

**113. “HOORAY HARRY’S DUMPED” Sunday Mirror, 11 November 2007, Zoe Griffin and Nick Owens**

158. This article, which was published on page 9 of the Sunday Mirror, reports that Chelsy and I had split up and that I had been on a night out to “*drown my sorrows*”. The article featured a large photograph of me, seemingly from the night out that the Defendant was reporting on, along with a small photograph of the nightclub I was at, another of my father, and one of me kissing Chelsy’s cheek. It was co-authored by Zoe Griffin and Nick Owens. I understand that it has been shown in this litigation that Zoe Griffin was a commissioner of the Private Investigator firm, Commercial & Legal Services, and Mr Owens was a user of Dan Hanks, and a prolific user of Commercial & Legal Services

159. Along with the photograph, the article reports my arrival time, how I entered the club and who else was with me. It even reports that I wasn’t required to pay the entry fee. This is another occasion of where the Defendant’s journalists, or paparazzi engaged by them, seemed to know exactly where I was, so they could be there at the right time to get their photo. I did go to this particular nightclub, Amika in Mayfair, on a few occasions, but as I have said previously, my movements were never intended to be public knowledge. They were intentionally kept confidential for security reasons, so how did they know? The whole narrative of the article seems designed to make me look bad. It’s another attack on me for doing what most of my military colleagues were doing – just enjoying an occasional night out – but it’s only me that’s under the microscope, having to endure all of the details being published to the whole country. Even details of the balance of the tab. I doubt that figure is accurate, but feels intended to me look irresponsible, frivolous. I always felt like the tabloids were hoping for something more, for me to get worse in some way to give them even more to say if I snapped.

160. What also strikes me about this article is the reference to the fall out between me and Chelsy. Again, how would they have known this? My solicitors have shown me an invoice for the agency, BDI, dated 9 November 2007 with the subject “Project Harry”. I understand BDI are well known in this litigation for their unlawful activities. The timing of the invoice, and the fact the Defendant’s journalists produced such a detailed story in the Sunday edition of the Mirror about a night out that had happened on Friday, makes me believe that they were undertaking unlawful activity to try and uncover personal details about my relationship to include in the article to make more of a story.

161. There were also a number of suspicious calls made to Paddy Haverson the day prior to the publication of the article on 10 November 2007. It is clear to me that MGN were digging around my associates in order to gather private information about me. In his role as my father’s

Communications Secretary, he would have been the first to know if something newsworthy about my brother and/or I had occurred good or bad and would, in all likelihood, been the one to have known the most about it. If they were accessing his voicemails, it is likely those messages contained extensive information about what actually happened or how it was being handled.

162. I have also been shown two Contribution Payment Requests, both dated 11 November 2007, which relate to this article. The first is to Xposure Photos Ltd for £350 described as 'P11 Prince Harry' and the second to Gotcha Images for £75 described as 'P11 Chelsy Davy'. These both look like payments to paparazzi. It's no wonder that Chelsy and I constantly felt so harassed, although I'm still unclear as to how they knew where we were.

**115. "DOWN IN THE DUMPED" Mirror, 12 November 2007, Emily Nash**

163. This article was published on page 23 of the Daily Mirror and written by Emily Nash, who I understand is known within this litigation as a commissioner of the PI firm, Commercial & Legal Services. It includes a large photograph of me in my fatigues at a Remembrance Day service, along with two smaller photographs – one of Chelsy, another of the two of us together in the back of a vehicle. It reports that Chelsy had asked for a trial separation in an "*emotional phone call*" the week before the article was published, and that I had only visited her once in Leeds in the six weeks she had been living there. It also included a quote from a 'friend', that said we needed some time out, but that we were likely to get back together.

164. Again, it's not clear to me how the Defendant had this information, or why they thought it was necessary to publish it. If this article was published during one of the times we had split up, it was clearly an upsetting time for both of us and I don't understand where the public interest is in exposing all of these personal and private details. Given our strong desire to keep as much of our relationship private as possible, we never confirmed to anyone outside of our closest friends that we had split up, and I do not believe any of them would have provided quotes to the Defendant's journalists. If anything we did tell someone then appeared in print, we would not have avoided telling them anything so personal again, yet somehow the Defendant was able to retrieve quote after quote from 'friends' to include in these articles. Given I was likely to have exchanged voicemails with Chelsy at this time discussing the difficulties in our relationship, I now find this very suspicious

**117. "Harry met Chelsy..." Sunday Mirror, 18 November 2007, No byline**

165. This article, which appeared in a small column on the centre of page 4 of the Irish edition of Sunday Mirror, was not attributed to a particular journalist and featured the same small photograph of me and Chelsy in the back of a vehicle. It reported that Chelsy and I had a "*secret meeting*" where I had "*begged her for a second chance*". It reports that our "*two hour*"



meeting had taken place at a mutual friends apartment in London. An unidentified 'royal source' is quoted as telling the Irish Sunday Mirror that I felt guilty, that we had a string of arguments towards the end of our relationship, and that we "*used to speak on the phone every day, but [Chelsy] refused to take [my] calls last week*".

166. I don't recall this particular meeting, but as I have said above, we did have a few break ups during the time we were together, and I do believe one of them was when Chelsy was studying in England. If we had met at a friend's apartment, it would have been someone we trusted implicitly, so I don't believe anyone would have provided any details to the Defendant's journalists, either here or in Ireland. Any "*secret*" meetings to make up with my girlfriend, or the number of times we spoke on the phone, or the fact she was refusing to take my calls, was not something I would have told anyone at the Palace either, so who the 'royal source' is, is very unclear to me. Given what I know now about the practices employed by the Defendant's journalists, I believe the details regarding our phone calls are more likely to have come from itemised phone records obtained by them.

167. These kinds of articles made me feel as though my relationship with Chelsy was always set to be doomed. We couldn't even meet in private or have arguments over the telephone, without the Defendant somehow learning these details and publishing them for the whole country to see. Again, it was just that feeling of being under surveillance all the time. I believe Chelsy found this even more difficult to deal with when she lived in England. Even if she was reading the newspapers, others around her were and everyone has a limit as to what they can endure.

**119. "BACK TOGETHER" Mirror, 20 November 2007, Fiona Cummins**

168. This article, published on page 3 of the Mirror and written by Fiona Cummins (who, I understand is known in this litigation as a prolific commissioner of private investigators including ELI, Searchline and Commercial & Legal Services), is marked as an 'exclusive'. It reveals that Chelsy and I were back together again, after I "*repeatedly begged her*" to take me back, and that I had "*bombarded her with texts and phone calls apologising for the antics that caused the split.*" It also states we had a two-hour love summit over the weekend. It includes a quote from an unidentified 'pal', that I had "*pestered her with texts and calls*". The article also says that the reason Chelsy broke off our relationship was because she found texts from another girl on my phone.

169. The level of detail regarding our phone communications is shocking and so blatant. While I can't recall the specific details of the state of our relationship at this time, it's highly unlikely I told anyone the details of the way I was trying to patch things up with Chelsy, it's hardly flattering to be contacting someone so much it could be described as "*pestering*" them.

I have no idea who the pal referred to could be, or how they would know the information that is attributed to them. It seems highly suspicious. We also didn't have the kind of relationship where we checked each other's phones, so the reference to that being the reason Chelsy broke up with me is also confusing or perhaps deliberately damaging. It seems to me that the Defendant's journalists may have seen a new number in my phone records, and put two and two together to make five – or just a juicier story.

170. Once again, this article has a brief quote at the end which is attributed to a Clarence House spokesperson, saying they don't comment on our personal lives. This shows the information was put to them by the Defendant's journalists for comment, but where did that information come from in the first place?

171. The Paddy Haverson call data shows a suspicious call made to him on 19 November 2007, the day before this article was published. Again, it is obvious to me that MGN were digging around the phones of my associates unlawfully to gather private information about me.

**120. "ER, ok if I drop you off here?" Sunday Mirror, 2 December 2007, By Susie Boniface**

172. This article, which appeared on page 28 of the Sunday Mirror, marked as an 'exclusive', was written by Susie Boniface. I understand from my solicitors that Susie Boniface was a prolific commissioner of private investigators including TDI/ELI, Jonathan Stafford and Commercial & Legal Services. The article includes a large, close-up photograph of Chelsy walking away from my car in driveway of the grounds of Kensington Palace. It reveals the photograph is "*proof*" that we were back together. It reports that Chelsy had spent the night at Kensington Palace and that I had dropped her off, hoping not to be seen.

173. When my solicitors showed me this article, I recognised the photograph immediately. It was taken through the archway that leads on to Kensington High Street, but still within the private road of Kensington Palace. There weren't routinely photographers waiting at this entrance, unless something big was happening. The reason I had dropped her off where I did was to avoid any members of the public seeing us by chance, so what are the chances of someone waiting at the archway, at the specific moment I dropped her off, with a camera ready?

174. My solicitors have shown me a private investigator invoice from Newsreel UK for £500. Given what I've been told about Newsreel's activities, I find this highly suspicious. I have also been shown various other Contribution Payment Requests, including a payment to Jason Hedges for £360 regarding '1/12 Chelsy watch', another to Maliton Meagher for £360 regarding '1/12 Chelsy watch', another to Sportsbeat Images Ltd (Pix only) for £180 regarding 'Prince Harry at the Rugby', another to Ken Goff for £75 regarding 'P1 Prince Harry' and a final one to Matrix Syndication for £34 regarding 'P11 Prince Harry'. Given how little there really is to the story, it is mind boggling the amount of enquiries and payments MGN had made.

**126 “Harry fear as mobile is swiped” Mirror, 26 July 2008, No byline**

175. This short article, which was published in a column on the left-hand side of page 6 of the Daily Mirror, is not attributed to any particular journalist. It reports that I had had my mobile phone stolen from a nightclub in Lesotho, before being returned to me two days later. It states that my contacts and texts were not accessed as they were password protected.

176. I remember this incident so clearly, I was pickpocketed. I suspected I was targeted, nothing about it felt opportunistic. It felt so smooth, so calculated and so clever. My first worry when I realised it was gone that very private and personal text messages were going to be splashed across the newspapers. I knew it was likely the British press, including the Defendant, would know where I was, as they always did. I could never relax. I knew the Institution could wipe our devices remotely, but I was still worried. I don't understand how the Defendant's journalists could know that my contacts or texts weren't accessed. I'm not even sure I knew that, given the phone was missing for a few days.

**127 “SOLDIER HARRY’S TALIBAN” The People, 28 September 2008, Dean Rousewell, Royal Editor**

177. This article, which appeared on page 19 of The People, was written by Dean Rousewell and marked as an 'exclusive'. The article reveals that I had been “*banned*” from returning to service in Afghanistan, as it would present an “unacceptable risk” to me and my comrades, but the possibility of serving in Iraq has not been ruled out. It includes a quote from an unidentified 'source' that said I was being let down gently because I believed there was a vital job to be done in Afghanistan, and that while my family and regiment believe I had proved myself, I was worried I would look like a lightweight soldier.

178. I had been withdrawn from Afghanistan in March 2008 because of the security threat my regiment faced. There was supposed to be a press embargo, and in an attempt to keep this in place, it had been agreed that subject to certain details being kept strictly confidential, some members of the British media would join me for a period to take exclusive photographs and footage. Even in a warzone, I couldn't escape the media. Unfortunately, an Australian journalist revealed my location and an American website broke the press embargo. A target had been placed on my head and I was withdrawn.

179. The Defendant's journalist was right to say I was desperate to get back. I was doing everything I could to be allowed to serve again. I wanted to do a full tour. I was frustrated. I was speaking to those close to me about this, often over the phone. I really did want those close to me to know I wanted to get back, I wanted my family to understand how important it was for me to serve again. All of this is accurately reported by the Defendant. To have any

chance of being allowed to serve again, I had to get the right people to agree and fight my corner. This included speaking to my private secretary, Jamie Lowther Pinkerton, who did escalate the matter. However, articles like this did not help and it's not clear to me who the source would be that the Defendant quotes. Everyone I spoke to knew the importance of discretion, and that media reporting was the whole reason I had been withdrawn. I don't believe anyone who had the details contained within the articles would want to jeopardise my career by speaking about it, so I find this 'exclusive' article to be highly suspicious, especially as my solicitors have shown me a Contributions Request Payment made to Rob Palmer on 28 September 2008 in the sum of £500. The description for the payment reads '*Harry Afghan tour blocked*' which clearly relates to this article. Again, it is obvious that MGN commissioned enquiries to obtain private details about me using unlawful means. The impact this kind of thing had on my career, my drive and my mental health is so upsetting.

**130. "HE just loves boozing & Army SHE is fed up & is heading home" Sunday Mirror, 25 January 2009, Grant Hodgson**

180. This article, which appeared on page 3 of the Sunday Mirror, features a large paparazzi shot of Chelsy in a bikini on the beach, along with some smaller historic photographs of us together. It's marked as an 'exclusive' and is written by Grant Hodgson. I understand that Grant Hodgson was a regular commissioner of private investigators including ELI and Commercial & Legal Services. Once again, it is reported that Chelsy and I have split up, with the reason that I "loved the Army more than her". It revealed that we had "several tense meetings" the week before, and that she decided to call it a day. It included a comment from a 'friend' that the final straw for her was me signing up to a helicopter pilot training course, as it would leave so little time for a serious relationship. Other details reported included that I was understood to have spoken to my father about my relationship with Chelsy before taking on the helicopter training, that Chelsy was planning to return to South Africa to do corporate law there, and that we had scrapped plans to travel to South Africa together after New Year, after having rows while we were away in Mauritius.

181. My solicitors have shown me another payment to Newsreel for 'Chelsy & Harry assist' which appears to relate to this article as it dated the day before publication. It seems clear to me that the Defendant's journalists did not obtain this exclusive story from lawful means. There is also a payment to Rob Palmer for £500 entitled 'Harry booze bungles'.

182. Also shown to me is call data to Chelsy's mobile, where there were three calls made by MGN journalists to her phone on 24 January 2009. Chelsy would not have given her number to any journalist, let alone speak to them. Seeing the call data in black and white just makes me realise how much the Defendant's journalists would have heard. It's violating. Every relationship has its challenges, but they're private – just clearly not for us.

**132. "3am: What a way to Harry on" Mirror, 26 March 2009, Clemmie Moodie & Danielle Lawler**

183. This article took centre page of the Mirror's 3am column, on page 13. It included a small picture of me, along with a photograph of Astrid Harbord. I understand the '3AM girls', of which Clemmie Moodie and Danielle Lawler were the 2009 incarnation, are well known in this litigation for the fact that that column published stories admitted by MGN to have been the product of unlawful activities, as I have set out above. It reported that I had been to watch the rugby at Twickenham with Astrid, who they report was my girlfriend. They quote a 'spy' as saying Astrid and I had been on a "few secret dates over the past three weeks", as well as reporting that she had spent the night at Clarence House.

184. A lot of the details in this article are incorrect. Astrid was a close friend of mine, she was never my girlfriend. It seems to me the Defendant was either trying to create a story, or they had got the wrong end of the stick. Astrid and I were in regular contact, we texted and exchanged calls and voicemails as we were in the same circle of friends and spent a lot of time together. This kind of article from the Defendant was just embarrassing for me. Friends teased me, it created an awkwardness between me and whichever girl was at the subject of the story. I have been shown six payments to private investigator, Commercial and Legal, made on 7 March 2009 which relate to Astrid, which shows that she was of prior interest to the Mirror.

**133. "HARRY'S DATE WITH GLADIATORS STAR" The People, 19 April 2009, Katie Hind**

185. This article, which appeared on page 15 of the People, was written by Katie Hind. I understand she is well known in this litigation for being a regular user of the private investigators Rob Palmer and Commercial & Legal Services. The article is marked both as an 'Exclusive' and a 'Picture Exclusive', as it carries two photographs of me, and the well-known television personality Caroline Flack, together on a street in Fulham, London. The photographs were taken at night. The article reports that I had "*dashed*" from my helicopter training in Lincolnshire to be with Caroline, where we joined four friends for a "*lively*" dinner party. It reports we left the house after midnight, with an 'onlooker' (who I believe to be the paparazzi who were hiding) saying we looked very happy together.

186. I remember this article, and these photographs, so clearly because at the time, I was so shocked - and livid - that the two photographers from IKON Pictures knew where we would be and were already there, waiting for us to arrive. They were hiding underneath a car. These photographers became known to me as there were numerous highly suspicious, and often dangerous, incidents involving them.

187. The photographs are taken outside Mark Dyer's apartment. We had a poker night, and the article is correct that I had rushed back on a Friday evening from Lincolnshire to join the

night, and had invited Caroline along. Caroline and I had been in contact for a couple of weeks. As Caroline was always of great interest to the tabloids, she was often hounded by them, we had expected that meeting at Marko's would be low key and private. It was only the second time we met in person, I think. Marko and I had exchanged voicemails about the night we had planned, and given the way I left, there's no way I could have been followed coming down from Lincolnshire. Only Marko, Caroline and I knew of the plans, there was only a couple of other people invited and I don't think they knew that Caroline would be joining us.

188. Given the fact only the three of us knew the plan, I was highly suspicious and convinced someone had leaked the information to the press. I was angry. I hadn't told anybody. I obviously doubted Caroline, but I even came to distrust Marko. My brother and I stopped talking to him for a while as we just couldn't understand how stories about us meeting privately with him ended up in the papers, or how photographers would end up outside his apartment. I now believe this information had come from our voicemails – mine, Marko's or Caroline's. The impact these kinds of stories had on my relationships cannot be underestimated. Even those I trusted the most, I ended up doubting.

**134. "CHELSY'S 'NEW FELLA'" The People, 26 April 2009, Katie Hind**

189. This article, which was published on page 9 of The People in the lefthand column, features a photograph of Chelsy outside a club, and another small headshot of me. It is written by Katie Hind, who I understand is well known in this litigation for being a regular user of the private investigators Rob Palmer and Commercial & Legal Services. The article reports that I had been "*bombarding*" Chelsy with calls in an attempt to win her back, and that she had told me that she had found someone else. It reports that we were both out with friends at clubs around the same location, and includes a quote from an 'onlooker' that said Chelsy had three bouncers guarding the door of her VIP room as she was worried about a scene. The article also includes a quote from an unidentified 'close pal' of Chelsy's, that said I had "*begged*" Chelsy to take me back.

190. Chelsy and I were separated at this point in time. I don't recall this specific night or occasion, but the reports of the calls between us feel very suspicious to me. Again, this is not the kind of information that is flattering to me. I would not have told anyone if I was calling Chelsy regularly and given the way Chelsy has also been guarded with who she tells information to, I have no idea who the 'close pal' could be that the Defendant's journalists are attributing some of the information to.

**My Mirror Group Claim**

191. I fully accept and agree with the fact that journalists and the media own the public square, in as much as, if you are in a position of responsibility and or are funded by the taxpayer, the media should have the power to be able to investigate anyone, anytime, for pretty much anything. The problem is that, over the last 15 to 20 years, there are now incredibly powerful media companies who masquerade as journalists and who have, quite literally, hijacked journalistic privileges for their own personal gain and agenda, It's an unbelievably dangerous place. I believe it doesn't matter whether you're a public figure at this point. Whoever you are, if you are of interest to the press at that time, wherever you are, whatever you're doing – if you're in private or if you're in public – you are a target. You become a victim of their system. They claim to hold public figures to account, but refuse to hold themselves accountable. If they're supposedly policing society, who on earth is policing them, when even the government is scared of alienating them because position is power. It is incredibly worrying for the entire UK.

192. In my view, in order to save journalism as a profession, journalists need to expose those people in the media that have stolen or highjacked the privileges and powers of the press, and have used illegal or unlawful means for their own gain and agendas. In the same vein, I am bringing this claim, not because I hate the tabloid press or even necessarily a section of it, but in order to properly hold the people who have hijacked those privileges, which come with being a member of the press, to account for their actions.

193. This has become a huge problem of which I have a unique perspective and experience perhaps, having had a front row seat to it. Because they have showed no willingness to change, I feel that I need to make sure that this unlawful behaviour is exposed, because obviously I don't want anybody else going through the same thing that I've been going through on a personal level. But also, on a national level as, at the moment, our country is judged globally by the state of our press and our government – both of which I believe are at rock bottom. Democracy fails when your press fails to scrutinise and hold the government accountable, and instead choose to get into bed with them so they can ensure the status quo. I may not have a role within the Institution but, as a member of the British Royal family, and as a soldier upholding important values, I feel there's a responsibility to expose this criminal activity in the name of public interest. The country and the British public deserve to know the depths of what was actually happening then, and indeed now. We will be better off for it.

194. Unfortunately, as a consequence of me bringing my Mirror Group claim, both myself and my wife have been subjected to a barrage of horrific personal attacks and intimidation from Piers Morgan, who was the Editor of the Daily Mirror between 1995 and 2004, presumably in retaliation and in the hope that I will back down, before being able to hold him properly accountable for his unlawful activity towards both me and my mother during his editorship.

## **Board and Legal Department knowledge**

195. My view is how can anybody possibly trust a media organisation, that enjoys the liberties of free press, when their own legal people and Board covers up the truth? When they have the powers that they have, and where even the police and the government are scared to hold them accountable or seek justice against them, they can truly believe they are above the law. And if they're above the law, then it's the general public that suffer. It's really that simple.
196. It does make you feel completely helpless and hopeless, and if that's how it feels to someone in my position – having grown up with advisors and secretaries to try and manage press relations, I can only imagine what that feels like for everybody else. If I had known this cover up was going on back in the day, I would have been disgusted and would have tried to seek some kind of justice, although I suspect I wouldn't have got very far. However, having experienced what I have over the last six years in terms of the constant harassment (online and off), intimidation and abuse that my wife and I have suffered at the hands of the tabloids, this sort of appalling behaviour doesn't really surprise me. Unfortunately, without proper press regulation (which the current government clearly have no appetite for, because their friends in the press said so), it's only going to get worse.
197. Finding out about this level of cover up is what makes me want to see my MGN claim through to the end, so people can really understand what happened. The fact that it was not just the journalists who were carrying out the unlawful activity, but also those in power who were turning a blind eye to it so as to ensure that it would continue unabated, and who then tried to cover it up when the game was up is appalling. The fact they're all ganging up to protect each other, like they first did after Leveson, is the most disturbing part of it all, especially as they're the mothership of online trolling. Trolls react and mobilise to stories they create. People have died as a result, and people will continue to kill themselves by suicide when they can't see any other way out. How much more blood will stain their typing fingers before someone can put a stop to this madness.

## **Conclusion**

198. My solicitors have shown me a witness statement from the Daily Mirror's former Royal Reporter, Jane Kerr, who I understand is bylined in only ten of the fifty selected articles about which I complain. It would appear from her comments that in most cases she can neither recall the story nor its source. I have also been shown a witness statement by Martin Fricker, who is not bylined in any of the selected articles but does confirm that he neither recollects the story to which he is bylined (which is outside the selected 50) nor its source.

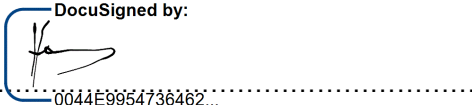


199. I note that there isn't a witness statement from either Dean Rousewell, who is bylined in ten of the fifty selected articles, or from any of the other 31 journalists who are bylined in those articles. Although I understand that they are not obliged to come and give evidence, I find it absolutely appalling that these people refuse to do so or subject themselves to cross examination especially as I have been forced to relive a horrific period in my life in order to prepare this witness statement and will be only too pleased to subject myself to cross examination in Court. Their cowardice speaks volumes, and I don't understand how they are allowed to hide.

200. As I mentioned earlier, one of the reasons why I'm bringing this claim is to hold people to account for what they have done, so that they can't hide behind their own institution or organisation. As I am subjecting myself to the Court process, I fully expect the journalists in question to also come along and explain how they wrote these stories because, on the one hand, MGN admit that phone hacking and other unlawful information gathering went on but, on the other, they deny liability for every claim that's been brought against them including my own. They admit people were doing it but deny the victims' claims. Their position makes no sense and I am determined to get to the bottom of it once and for all.

### **STATEMENT OF TRUTH**

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed  DocuSigned by:  
0044E9954736462...

**PRINCE HARRY, DUKE OF SUSSEX**

Date: 24 February 2023

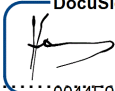
**CONFIRMATION OF COMPLIANCE**

I understand that the purpose of this witness statement is to set out matters of fact of which I have personal knowledge.

I understand that it is not my function to argue the case, either generally or on particular points, or to take the court through the documents in the case.

This witness statement sets out only my personal knowledge and recollection, in my own words. On points that I understand to be important in the case, I have stated honestly (a) how well I recall matters and (b) whether my memory has been refreshed by considering documents, if so how and when.

I have not been asked or encouraged by anyone to include in this statement anything that is not my own account, to the best of my ability and recollection, of events I witnessed or matters of which I have personal knowledge.

DocuSigned by:  
  
Signed .....0044E9954736462.....

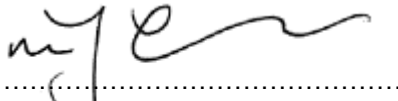
**PRINCE HARRY, DUKE OF SUSSEX**

Date: 24 February 2023

**CERTIFICATE OF COMPLIANCE**

I hereby certify that:

1. I am the relevant legal representative within the meaning of Practice Direction 57AC.
2. I am satisfied that the purpose and proper content of trial witness statements, and proper practice in relation to their preparation, including the witness confirmation required by paragraph 4.1 of Practice Direction 57AC, have been discussed with and explained to Prince Harry, Duke of Sussex.
3. I believe this trial witness statement complies with Practice Direction 57AC and paragraphs 18.1 and 18.2 of Practice Direction 32, and that it has been prepared in accordance with the Statement of Best Practice contained in the Appendix to Practice Direction 57AC.

Signed:.....

**RODERICK CHISHOLM BATTEN**  
Principal, Clintons

Date: 24 February 2023

## APPENDIX 1

## LIST OF DOCUMENTS

No	Document Description
1.	Chelsy Davey – Call Data
2.	Chelsy Davey – PI invoices
3.	Princess Diana – PI invoices
4.	Guy Pelly – PI invoices
5.	George Springfield – PI invoices
6.	Paddy Haverson – Call Data
7.	Jamie Lowther Pinkerton – Call Data
8.	Schedule of PI payments in Confidential Schedule D of the Amended Particulars of Claim
9.	Schedule of PI payments to be pleaded (proposed Confidential Schedule I of Amended Particulars of Claim, as sent to RPC on 17 February 2023)
10.	Payments recorded in Revised Schedule by way of Supplement Disclosure (as sent to RPC on 24 February 2023)
11.	Nick Buckley Palm Pilot
12.	Sun Accounts Finance System (SAFS) Payment Records Data entry GMFRASE001 dated 4 April 1996 entitled ' <i>Prince Harry Special</i> '
13.	Sun Accounts Finance System (SAFS) Payment Records Data entry GMNFRASE021 dated 2 February 1998 entitled ' <i>DIANA AND HARRY</i> '
14.	Statement published by St James' Palace dated 28 April 2003
15.	MGN's Amended Defence and Schedule to Amended Defence dated 23 November 2022
16.	Witness Statement of Jane Kerr dated 10 February 2023
17.	Witness Statement of Martin Fricker dated 9 February 2023
18.	Private letter from Princess Diana to Michael Barrymore dated 23 March 1997
19.	Private letter from Princess Diana to Michael Barrymore dated 25 April 1997
20.	Private letter from Princess Diana to Michael Barrymore dated 2 June 1997
21.	Article published by The Mirror entitled " <i>Diana so sad on Harry's Big Day</i> " by John Todd dated 16 September 1996
22.	Article published by The Mirror entitled " <i>Princes take to the hills for gala</i> " by Ian Miller dated 17 July 2000

23.	Article published by The Mirror entitled " <i>Harry's time at the bar</i> " by Jessica Callan, Eva Simpson & Polly Graham dated 19 September 2000
24.	Article published by The Mirror entitled " <i>Snap..Harry breaks thumb like William; Exclusive</i> " by Jane Kerr dated 11 November 2000
25.	Article published by The Mirror entitled " <i>Tiggy Legge walk</i> " by Wayne Francis dated 3 September 2001
26.	Article published by Sunday Mirror entitled " <i>Rugger off Harry</i> " by Andrew Luckwell dated 11 November 2001
27.	Article published by Sunday Mirror entitled " <i>Harry took drugs</i> " (page 1) and " <i>Cool it Harry</i> " (page 11) by Gerard Couzens dated 13 January 2002
28.	Article published by The Mirror entitled " <i>Harry's cocaine ecstasy and GHB parties</i> " by Jane Kerr & Jeff Edwards dated 14 January 2002
29.	Article published by The Mirror entitled " <i>Harry's sick with 'kissing disease'</i> " by Jane Kerr dated 29 March 2002
30.	Article published by The Mirror entitled " <i>No Eton trifles for Harry, 18</i> " by Jane Kerr dated 16 September 2002
31.	Article published by The People entitled " <i>Plot to rob the DNA of Harry</i> " by Dean Rousewell dated 15 December 2002
32.	Article published by The Mirror entitled " <i>Plot to steal Harry DNA</i> " by Harry Arnold dated 16 December 2002
33.	Article published by Sunday Mirror entitled " <i>Harry – I'm going to join army</i> " by Rupert Hamer dated 5 January 2003
34.	Article published by The People entitled " <i>Matured Harry is a godfather</i> " dated 20 April 2003 – no byline
35.	Article published by The Mirror entitled " <i>Harry to lead Cadet's march</i> " dated 29 April 2003 – no byline
36.	Article published by The Mirror entitled " <i>Prince is in charge at parade</i> " by Steve Atkinson dated 29 April 2003
37.	Article published by The Mirror entitled " <i>Harry's top Army mark</i> " dated 23 September 2003 – no byline
38.	Article published by The Mirror entitled " <i>Harry is ready to quit Oz</i> " by Jane Kerr dated 27 September 2003
39.	Article published by Sunday Mirror entitled " <i>Bored Harry in polo jaunt</i> " by David Rowe dated 2 November 2003
40.	Article published by The Mirror entitled " <i>Beach bum Harry</i> " by Jane Kerr dated 16 December 2003
41.	Article published by The People entitled " <i>Wills.. Seeing Burrell is only way to stop him selling more Diana secrets Harry No... Burrell's a...</i> " by Rachael Bletchly dated 28 December 2003

42.	Article published by The Mirror entitled <i>"Polo trip next up for Harry"</i> by Adrian Shaw dated 31 December 2003
43.	Article published by The Mirror entitled <i>"I'm so sorry Papa"</i> by Gary Jones dated 23 October 2004
44.	Article published by The Mirror entitled <i>"Harry is a Chelsy fan"</i> by Anthony Harwood dated 29 November 2004
45.	Article published by The Mirror entitled <i>"When Harry met Daddy.. the biggest danger to wildlife in Africa"</i> by Graham Brough & Jane Kerr dated 13 December 2004
46.	Article published by The Mirror entitled <i>"Harry's girl "to dump him" "</i> by Jane Kerr dated 15 January 2005
47.	Article published by The Mirror entitled <i>"Chelsy is not happy"</i> by Jane Kerr dated 15 January 2005
48.	Article published by The People entitled <i>"Chelshocked"</i> by Dean Rousewell dated 23 January 2005
49.	Article published by Sunday Mirror entitled <i>"You did what!"</i> by Simon Wright dated 6 February 2005
50.	Article published by The Mirror entitled <i>"Who dares Windsors"</i> by Jane Kerr & Chris Hughes dated 4 March 2005
51.	Article published by The Mirror entitled <i>"Tony Parsons: Prince Charles"</i> by Tony Parsons dated 14 March 2005
52.	Article published by The People entitled <i>"Chelsy's gap EIRR"</i> by Dean Rousewell dated 24 April 2005
53.	Article published by The People entitled <i>"Harry Carry!"</i> by Dean Rousewell dated 15 May 2005
54.	Article published by The People entitled <i>"Chel Shocked"</i> by Dean Rousewell dated 9 April 2006
55.	Article published by The Mirror entitled <i>"Harry in space"</i> by Stephen Moyes dated 24 July 2006
56.	Article published by The People entitled <i>"Chelsy in gun terror"</i> by Dean Rousewell dated 10 September 2006
57.	Article published by The Mirror entitled <i>"I'm rarin' to go"</i> by Chris Hughes dated 23 February 2007
58.	Article published by The People entitled <i>Harry..Don't be a hero"</i> by Dean Rousewell dated 4 March 2007
59.	Article published by The Mirror entitled <i>"Just Harry up"</i> by Victoria Ward dated 7 September 2007
60.	Article published by The People entitled <i>"Davy stated!"</i> by Dean Rousewell dated 16 September 2007

61.	Article published by Sunday Mirror entitled " <i>Hooray Harry's dumped</i> " by Zoe Griffin & Nick Owens dated 11 November 2007
62.	Article published by The Mirror entitled " <i>Down in the dumped</i> " by Emily Nash dated 12 November 2007
63.	Article published by Sunday Mirror entitled " <i>Harry met Chelsy...</i> " dated 18 November 2007 – no byline
64.	Article published by The Mirror entitled " <i>Back together</i> " by Fiona Cummins dated 20 November 2007
65.	Article published by Sunday Mirror entitled " <i>ER, OK if I drop you off here?</i> " by Susie Boniface dated 2 December 2007
66.	Article published by The Mirror entitled " <i>Harry fear as mobile is swiped</i> " dated 26 July 2008 – no byline
67.	Article published by The People entitled " <i>Soldier Harry's taliban</i> " by Dean Rousewell dated 28 September 2008
68.	Article published by Sunday Mirror entitled " <i>He just loves boozing &amp; Army She is fed up &amp; is heading home</i> " by Grant Hodgson dated 25 January 2009
69.	Article published by The Mirror entitled " <i>3am: What a way to Harry on</i> " by Clemmie Moodie & Danielle Lawler dated 26 March 2009
70.	Article published by The People entitled " <i>Chelsy's 'new fella'</i> " by Katie Hind dated 26 April 2009