THE CASE OF PHILIP HYLAND EXAMINED

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Author – Ian Clayton

THE GOVERNMENT'S DOCUMENTED INSTITUTIONAL INTEREST IN SOLICITOR

PHILIP HYLAND

PART 1

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AUTHOR'S NOTE

Philip Hyland is a solicitor who was engaged in legal challenges concerning Government Covid policy, vaccination and the criminal allegations recorded under CRN 6029679/21.

In the period which followed, Government developed a documented institutional *“interest”* in him; material concerning him entered governmental security structures; DHSC records refer to *“steps we took with the Solicitors Regulation Authority”*; and regulatory proceedings against him ultimately followed.

Those facts do not, without more, establish that one event caused another.

Whether, and to what extent, the events were connected is precisely one of the matters which the outstanding documentary record should now resolve.

The chronology nevertheless exists and it cannot responsibly be ignored.

This paper therefore proceeds from the primary documentary record.

It distinguishes what the documents establish from what remains unknown and identifies the questions which the responsible institutions are now capable of answering through disclosure of the records they hold.

Viewed as a whole and by practical outcome rather than institutional description, the chronology presents an uncomfortable appearance:

A solicitor who placed himself in the path of Government policy, challenged its legality and participated in reporting suspected criminality was, in practical terms, bulldozed out of the way.

Whether that appearance reflects coincidence, independent institutional decisions, or something more connected is not a question which this paper purports finally to determine.

It is a question which the evidence now requires to be answered.

Ian Clayton

THE DEPARTMENT, THE SOLICITOR AND THE REGULATOR

What DHSC's Own Records Reveal About Philip Hyland, CRN 6029679/21 and the Solicitors Regulation Authority

An evidential exposé

1. The documents have spoken

There are occasions when an investigation changes character.

- At first, there are allegations.
- Then there are denials.
- Then there are explanations.
- And eventually, sometimes years later, there are the documents.

This paper concerns the last of those stages.

Material from within the Department of Health and Social Care (DHSC), concerning solicitor Philip Hyland, provides an extraordinary contemporaneous record of what was taking place inside Government during the opening months of 2022.

The documents have been examined carefully because they disclose something considerably more substantial than the fact that somebody working within DHSC complained about a solicitor.

They disclose that DHSC had developed an institutional *“interest”* in Philip Hyland.

That is DHSC's word, not mine.

On 13 July 2022, an internal DHSC email stated:

“The other attachments here give the background to our interest in this individual and the steps we took with the Solicitors Regulation Authority.”

Pause there.

“Our interest in this individual”.

And:

“the steps we took with the Solicitors Regulation Authority”.

The individual was Philip Hyland.

The regulator was the SRA.

The question this paper addresses is simple:

What were those steps?

The documents permit us to begin answering it.

2. Before the complaint

The story does not begin with the SRA complaint of 15 February 2022.

That is important.

By 25 January 2022, DHSC's disclosed records contain Philip Hyland's letter to the Metropolitan Police Commissioner concerning:

“Crime Reference Number: 6029679/21”

The DHSC disclosure describes it as concerning the criminal complaint filed at Hammersmith Police Station on 20 December 2021.

On 27 January, DHSC records contained another communication concerning the same criminal complaint and identifying Philip Hyland.

On 2 February, another communication was circulating under the heading:

“CID Crime Number: 6029679/21 Notice of Criminal Investigation into Covid-19 Vaccines”

Again, Philip Hyland was identified.

On 6 February, DHSC held a copy of a PJH Law letter concerning the Metropolitan Police case.

On 7 February, DHSC material described a legal case involving Hyland as:

“the vexatious legal case we discussed.”

The words matter.

This was before the SRA complaint.

By then, Philip Hyland was not an unknown solicitor whose conduct suddenly came to DHSC's attention on 15 February.

His name, his firm, his correspondence, his litigation and his involvement with CRN 6029679/21 were already moving through DHSC records.

3. 14 February 2022

Then the chronology changes gear.

On 14 February 2022 at 09:05, DHSC records an email bearing the title:

“Standardised Formal Reporting Escalation Process of Security Issues to NVOC”

The material identified Philip Hyland and the criminal complaint made at Hammersmith Police Station.

This is an important document.

It tells us that by the day before the SRA complaint, material identifying Philip Hyland and CRN 6029679/21 was not merely sitting somewhere within departmental correspondence.

It had entered something DHSC itself described as a:

“Formal Reporting Escalation Process of Security Issues”.

The public is entitled to understand what that meant.

- Who ordered the escalation?
- What was NVOC?
- What security issue was believed to arise?
- Who received the escalation?
- Which institutions were connected to that process?

And, most importantly for what happened next:

Did that security escalation inform the decision to report Philip Hyland to his professional regulator the following day?

The documents presently disclosed do not answer those questions.

They make them unavoidable.

4. 15 February: DHSC goes to the SRA

On 15 February 2022, an SRA Report Form was completed concerning PJH Law.

Its language deserves to be reproduced accurately.

It stated:

“PJH Law is involved with Anti-Vaccination groups and the dissemination of Anti-Vaccination messaging.”

It continued:

“PJH Law shares misinformation to its recipients regarding:”

and identified, amongst other things:

“The sharing of the Met Police crime reference number, claiming there is an active investigation into the vaccination programme”

The report then advanced the following conclusion:

“The endorsement of misinformation by a regulated law firm and the inability to differentiate between a crime reference number and an open police investigation indicates that the firm should be reported to the Solicitors Regulation Authority as misconduct.”

And then came the demand:

“action by the SRA must be taken as a matter of urgency.”

The complainant was Paul Easter.

Easter did not present himself as an ordinary member of the public. In the complaint material already examined in this investigation, he identified himself as working for DHSC on behalf of HMG assessing risks to the UK vaccine programme.

There is now a further documentary connection which must be recorded, but not overstated.

A captured Minerva Advisory Group webpage, dated 15 July 2024, contains a dedicated profile for Paul Easter within Minerva's *"Who We Are"* structure.

Separately, a captured professional profile for Gary Gracey, dated 1 August 2024, records him as *"Team Leader"* at Minerva Advisory Group Ltd from July 2017 and at the same time, as a part-time lay member of the Solicitors Disciplinary Tribunal from May 2022.

The chronology therefore supports a limited but important proposition: Contemporaneous public records in July and August 2024 placed Easter and Gracey within the same Minerva Advisory Group environment, while Gracey was also serving as a lay member of the very tribunal to which the SRA had referred Philip Hyland.

That does not, without more, prove that Easter and Gracey personally knew one another, communicated about Hyland, or that their Minerva association played any part in the proceedings. Nor does the material presently establish the date on which Easter first became associated with Minerva. Those matters require evidence rather than assumption, but the common organisational connection itself is no longer merely speculative. It raises a proper disclosure question: What was the nature, timing and extent of the relationship between Easter, Gracey and Minerva Advisory Group and was that relationship known to the SRA or the Solicitors Disciplinary Tribunal?

That context matters.

Now, back to 15 February - something else happened that day.

5. Security Notice 37

At 13:56 on 15 February 2022, DHSC records an email concerning:

"20220214 UKCVS-CoVIC Security Notice 37 - Anti-Vaccination Activity at North-West London"

The DHSC disclosure summarises the relevant material as follows:

"Documentation referencing an ongoing police investigation into vaccine harm, or a legal case involving '[TPDW]' or 'PJH Law, should also be disregarded as fraudulent."

That sentence requires scrutiny.

Not disputed.

Not unverified.

Not potentially inaccurate.

The word recorded by DHSC is:

“fraudulent”.

By 15 February, therefore, we have two contemporaneous strands inside the same governmental environment.

One is an SRA complaint saying that PJH Law was disseminating misinformation by claiming that the Metropolitan Police matter constituted an active investigation.

The other is a DHSC security notice saying documentation referring to an ongoing police investigation into vaccine harm or a legal case involving PJH Law should be disregarded as *“fraudulent”*.

Coincidence may explain parallel reasoning, but evidence must determine whether it was parallel reasoning at all.

The question is obvious:

Did Paul Easter formulate his SRA complaint independently, or was he advancing a position already developed within DHSC's vaccine-security machinery?

That requires an answer from DHSC.

6. What happened next was not a single complaint disappearing into the SRA

The chronology immediately following the complaint is revealing.

On 16 February, DHSC records an email:

"Re: Please find attached complaint regarding PJH Law."

The SRA reference was:

RGC-000072316.

On 18 February, another communication concerning the same reference recorded that:

"The SRA has received several reports regarding social media posts, adverts and websites relating to the Covid-19 vaccine and including the details of PJH Law."

This matters because the evidence no longer describes a single citizen submitting a complaint and leaving the regulator to deal with it.

There was continuing communication.

DHSC was following what was happening and while that was happening, another document was being produced.

7. 17 February: Philip Hyland enters a DHSC "coordination" assessment

The title is not mine - It is the title recorded in the DHSC disclosure:

"ANTI-VACCINATION COORDINATION IN CRIME REFERENCE NUMBER 6029679/21 CAMPAIGN"

The document is dated 17 February 2022.

Its stated purpose was:

"to provide background on evidence of increased coordination in the UK-based Anti-Vaccination movement during the Crime Reference Number (CRN) campaign, and provide potential impact to the supply chain."

It then described an early-January narrative developing around several people.

One of those people was named:

"Philip Hyland (a lawyer associated with PJH Law)"

The sequence should be understood.

14 February: Philip Hyland appears within a formal DHSC security escalation.

15 February: PJH Law is reported to the SRA.

15 February: Security Notice 37 says documentation referring to an ongoing vaccine-harm investigation or PJH Law should be disregarded as *“fraudulent”*.

16 February: the SRA complaint is circulating within DHSC.

17 February: DHSC has a document expressly analysing *“coordination”* in the CRN 6029679/21 campaign and naming Philip Hyland.

This is no longer adequately described as:

“DHSC received concerns about a solicitor and somebody reported him to the regulator.”

The Department's own records reveal something institutionally broader.

8. The policing context

Now another document must be placed beside the DHSC material.

On 18 January 2022, ACC Owen Weatherill, acting as Operation Talla Silver and National Mobilisation Coordinator at NPoCC, issued a national policing communication concerning attempts to report alleged criminality associated with the vaccination programme.

That document specifically addressed the Metropolitan Police complaint of 20 December 2021 and it recorded that NPoCC was working closely with NHS and DHSC teams responsible for vaccine-programme security.

That matters because Paul Easter subsequently identified his own DHSC function by reference to risks to the UK vaccine programme.

- It does not prove that Easter received information from Operation Talla.
- It does not prove that NPoCC instructed DHSC to report Philip Hyland.
- It does not prove that the police directed the SRA.

Those propositions would require evidence we do not presently possess.

But, it does destroy any comfortable assumption that the institutional actors necessarily occupied separate worlds.

They did not.

National policing and DHSC vaccine-programme security were expressly working together.

The question is therefore not whether communication between those institutional environments was possible.

The documentary record shows the interface existed.

The question is:

What information actually passed through it?

9. 21 February

Then comes another date.

21 February 2022.

On that date Detective Superintendent Tor Garnett signed the Metropolitan Police communication setting out the MPS position concerning CRN 6029679/21 and stating that no further action would be taken.

On the same date, Emma Lessard informed Philip Hyland that the SRA would investigate complaints concerning him.

Again, the same date does not mean same cause.

That distinction must be maintained.

But, the subsequent SRA proceedings made the status of CRN 6029679/21 important to the regulatory case against Hyland.

The SRA's case included the proposition that Hyland had misrepresented the existence of an investigation.

And, the DHSC complaint itself had already attacked his supposed:

"inability to differentiate between a crime reference number and an open police investigation"

Accordingly, we need to know:

- *When did DHSC know the MPS position?*
- *When did the SRA know it?*
- *Who told each institution?*
- *And what did the underlying Metropolitan Police operational records actually show was occurring under CRN 6029679/21 at the relevant time?*

Those are questions of chronology.

Chronology is evidence.

10. Then came 22 February

This may be the most revealing sentence in the disclosure.

The SRA had notified Philip of its investigation on 21 February.

At 16:04 on 22 February, an internal DHSC Teams conversation records:

“Can you send me a non branded list of [TPDW]/PJH law targets since last Tues pse that I can send on to SRA”

The recipient then asked:

“who are PJH again?”

The answer came:

“PJH are an employment law firm”

Then:

“i mean what does PJH stand for sorry”

And the response:

“Philip Julian Hyland - the initials of the owner/director of the company”

Read the first sentence again.

A *“non branded list”*.

Of *“PJH law targets”*.

To *“send on to SRA”*.

These are not my descriptions - They are words preserved in DHSC's own disclosure.

The public is entitled to know what they meant.

- What were these *“targets”*?
- People?

- Doctors?
- Organisations?
- Recipients of solicitors' letters?
- Vaccination centres?
- Legal cases?
- Who compiled the list?
- Why was it to be *“non branded”*?
- What branding was being removed?
- Was the SRA told where the underlying information actually came from?
- And did this material subsequently enter the evidential case against Philip Hyland?

There may be innocent answers to every one of those questions.

But there must, certainly, be answers.

11. This did not stop after the complaint

On 28 February 2022, DHSC records another document:

“UKCVS CoVIC Security Notice 39 - Anti-Vaccination Co-ordination in Crime Ref. No. 6029679/21 Campaign”

It identified:

“Philip Hyland (a lawyer associated with PJH Law)”

A further document dated 3 March 2022 carried the title:

“ANTI-VACCINATION COORDINATION IN CRIME REFERENCE NUMBER 6029679/21 CAMPAIGN”

It stated:

“This document is intended to provide evidence of increased coordination in the UK-based Anti-Vaccination movement during the CRN campaign, and provide potential impacts to the COVID-19 vaccination programme.”

Again, Philip Hyland was expressly identified.

So the chronology did not end when DHSC reported Philip to the SRA.

The Department continued its assessment.

That distinction is fundamental.

Complaint is one thing.

Continuing governmental assessment of the solicitor after the complaint is another.

12. And what did the SRA say?

The SRA's own regulatory report subsequently stated:

“Complaints have been received about Mr Hyland and PJH Law from several members of the public and organisations, with no clear connection to one another.”

That sentence now requires examination against the disclosed institutional record.

We should be precise.

The DHSC documents do not establish that all complainants coordinated.

- They do not establish that Lord Tom Clement-Jones coordinated with DHSC.
- They do not establish that the BMA coordinated its approach with DHSC.
- They do not establish that Operation Talla directed anybody to complain.

But the SRA's proposition was not that coordination had not been proved.

Its report positively characterised the sources as having:

“no clear connection to one another.”

What investigation supported that conclusion?

- We now know that DHSC was receiving relevant material through public-sector routes.

- We know that DHSC had a vaccine-security function engaged with the subject.
- We know that NPoCC was working with DHSC vaccine-programme security.
- We know that DHSC reported Philip/PJH Law to the SRA.
- We know that DHSC continued internally to circulate the complaint.
- We know that DHSC was analysing Philip within a document concerning coordination around CRN 6029679/21.
- And we know that on 22 February somebody within DHSC requested a *"non branded list"* of *"PJH law targets"* specifically to send to the SRA.

Against those facts, *"no clear connection"* is no longer a phrase that can simply be repeated.

It requires evidential justification.

13. The disclosure problem

There is another aspect.

The SRA eventually decided to disclose complaints to Philip.

On 30 June 2022, Investigation Manager Steven Bint wrote:

“I have decided that it would be consistent with our First Principles of Disclosure and commitment to transparency to provide these documents to you, subject to some necessary redactions.”

Bint also confirmed:

“none of the complaints were made by either the Metropolitan or Warwickshire Police.”

That answer may have been literally correct, but the question now exposed by DHSC's records is considerably larger.

It is not simply:

Did the police themselves complete an SRA complaint form?

It is:

What information reached DHSC from policing or other public institutions; what did DHSC do with it; what material was then supplied to the SRA; and what provenance was disclosed to Philip and to the regulatory decision-maker?

A document does not lose its institutional history merely because another organisation forwards it and removing branding does not remove provenance.

14. DHSC eventually described exactly what it had done

Return now to July 2022.

By then Philip was pursuing access to information held about him.

On 13 July 2022, DHSC circulated an internal email concerning his information request.

The Department described the attachments in this way:

"The other attachments here give the background to our interest in this individual and the steps we took with the Solicitors Regulation Authority."

That is perhaps the clearest institutional description in the entire disclosure.

Not:

The complaint somebody happened to make.

Not:

An unsolicited report from a concerned individual.

DHSC itself described:

"our interest"

and:

"the steps we took with the Solicitors Regulation Authority."

The Department should now identify every one of those steps.

15. What the public can properly conclude

There are conclusions which these documents permit.

And there are conclusions which they do not.

The distinction matters.

- We can now say that DHSC's involvement with Philip Hyland was materially more extensive than the bare fact of Paul Easter's SRA complaint suggests.
- We can say that DHSC held and processed information concerning Philip and CRN 6029679/21 before the complaint.
- We can say that on 14 February material naming him entered a process described as a formal escalation of security issues.
- We can say that on 15 February PJH Law was reported to the SRA and that contemporaneous DHSC security material described relevant documentation involving PJH Law as material which should be disregarded as *“fraudulent”*.
- We can say that on 17 February DHSC held a document expressly examining *“coordination”* around CRN 6029679/21 and naming Philip.

- We can say that on 22 February DHSC personnel discussed producing a *“non branded list”* of *“PJH law targets”* to send to the SRA.
- We can say that DHSC continued producing or holding security assessments concerning the CRN campaign after the regulatory referral.
- And we can say that DHSC itself later described the record as showing:

  “our interest in this individual and the steps we took with the Solicitors Regulation Authority.”

Those propositions arise from DHSC's own disclosed record.

What we cannot yet say is:

- DHSC ordered the SRA to investigate Philip.
- We cannot yet say that Operation Talla directed DHSC's SRA complaint.
- We cannot yet say that the MPS closure decision and SRA investigation were coordinated.
- We cannot yet say that the BMA, Lord Clement-Jones, DHSC and policing actors acted pursuant to a common plan.
- And we cannot responsibly substitute suspicion for the missing documents.

That is precisely why those documents now matter.

16. The questions Government must answer

This exposé therefore does not end with an accusation.

It ends with something considerably harder to evade - the chronology.

- DHSC should explain who first established its institutional *“interest”* in Philip Hyland and why.
- It should explain what happened to information concerning him inside the Department between January and March 2022.
- It should identify the officials responsible for the 14 February security escalation.
- It should identify who authored and approved Security Notices 37 and 39.
- It should explain the evidential basis upon which material connected with PJH Law was described as *“fraudulent”*.
- It should establish whether Paul Easter's SRA complaint was his individual initiative or an action undertaken, discussed or approved within DHSC.
- It should disclose what information Easter possessed when he made that complaint.

- It should explain what relationship, if any, existed between the 14 February security escalation, Security Notice 37 and the complaint submitted on 15 February.
- It should explain the 17 February document analysing Philip within the CRN 6029679/21 *"campaign"*.
- And somebody within DHSC must explain, in plain English, this sentence:

  "Can you send me a non branded list of [TPDW]/PJH law targets since last Tues pse that I can send on to SRA"

The following questions must, now, also be answered:

- *Who were the "targets"?*
- *Why "non branded"?*
- *What was sent?*
- *Who received it at the SRA?*
- *Where is it now?*
- *Was Philip shown it?*
- *Was the SRA decision-maker told its true provenance?*

These questions are not rhetorical. They are requests for evidence.

17. The regulator must answer too

The SRA cannot stand outside this disclosure.

Its own official record confirms that Philip Hyland was ultimately referred to the Solicitors Disciplinary Tribunal and fined £15,000 following the 2024 hearing.

The subsequently identified Minerva material adds a further question of institutional provenance.

Gary Gracey's professional profile recorded him as a lay member of the Solicitors Disciplinary Tribunal from May 2022 and concurrently, as Team Leader of Minerva Advisory Group Ltd from July 2017. A Minerva webpage captured in July 2024 also carried a dedicated profile for Paul Easter.

On the evidence presently available, the responsible conclusion is not that this establishes personal coordination or bias. It establishes a common organisational association which overlapped in time with Gracey's membership of the SDT and which therefore ought to be capable of straightforward documentary clarification.

That makes the provenance of the regulatory evidence a matter of obvious importance.

The SRA should now disclose the complete DHSC communication chain.

Not just the complaint form. Not merely selected documents. But, the entire chain.

- Every document received from DHSC.

- Every attachment.
- Every subsequent communication.
- Every *"non branded"* document.
- Every record identifying its original source.
- Every internal SRA communication concerning the DHSC material.
- And every item placed before, or withheld from the decision-makers considering Philip Hyland.

That is how this matter can be resolved.

18. And policing has questions to answer

The MPS, NPCC and NPoCC likewise possess pieces of this chronology.

- National policing was addressing vaccine-related crime reports.
- NPoCC was working with DHSC vaccine-programme security.
- CRN 6029679/21 was expressly within that environment.
- DHSC was simultaneously receiving material concerning Philip and that CRN.

The following questions demand answers:

- *What travelled between those systems?*

- *What did DHSC know about the actual police activity taking place under CRN 6029679/21?*
- *Who supplied the proposition that references to an ongoing investigation were false?*
- *Did anybody in policing know that the proposition was being used as part of an attempt to secure regulatory action against one of the solicitors involved in making the allegations?*

Again, there may be entirely proper answers.

Produce them.

19. The Roman lesson

The Roman Republic did not become intelligible by studying what institutions said about themselves.

It became intelligible when one followed who knew what, who communicated with whom, when they did it and what followed.

That method requires no theatrical allegation.

Chronology does the work.

Here, the chronology begins with a solicitor involved in challenging government action and associated with a serious report to the Metropolitan Police.

It proceeds through Government records concerning him.

Then security escalation.

Then a DHSC complaint to his regulator.

Then a Government security notice.

Then a Government assessment naming him within a *“coordination”* campaign.

Then regulatory investigation.

Then a request inside Government for a:

“non branded list”

of:

“PJH law targets”

to send to the regulator.

And months later DHSC itself described the history as:

“our interest in this individual and the steps we took with the Solicitors Regulation Authority”.

No embellishment is necessary - No accusation needs to be manufactured.

The Roman Republic left records - So did the Department.

20. Conclusion - now account for it

This paper does not ask the public to decide whether Philip Hyland was right about every issue he advanced during the pandemic.

That is not the question.

Nor does it ask the public to adopt his views concerning vaccination, Government policy or CRN 6029679/21.

Those questions can be argued elsewhere.

This paper concerns something more elementary.

- ***What happens when a Government department develops an "interest" in a solicitor whose work touches matters of acute governmental sensitivity?***
- ***What happens when information about that solicitor enters security structures?***
- **What happens when the Department reports him to his professional regulator?**
- **What happens when the Department continues gathering and assessing information concerning him after doing so?**
- ***And what happens when an internal Government message asks for a "non branded list" of that law firm's "targets" for transmission to the regulator?***

We now know enough to ask those questions.

We do not yet know enough to answer all of them.

That distinction is precisely why disclosure matters.

- DHSC should answer.
- The SRA should answer.
- The relevant policing bodies should answer.
- And each should answer independently, against the contemporaneous documentary record, so that their accounts can be compared.

The documents have taken this matter beyond conjecture. They establish that there was an institutional history requiring explanation.

The remaining issue is whether the institutions concerned will now provide it.

- The record has been opened.
- The names are known.
- The dates are known.
- The words are theirs.

Now, account for them.

Ian Clayton

18 August 2026

WHEN A LAWYER GETS IN THE WAY

PHILIP HYLAND

PART 2

Author – Ian Clayton

AUTHOR'S NOTE

This paper began with a simple exercise: Put the documents in chronological order and allow them to speak to one another.

What emerges should be approached with care.

Philip Hyland was a solicitor who challenged aspects of Government Covid policy, including vaccination measures, acted in litigation arising from them and became associated with the serious criminal allegations recorded by the Metropolitan Police under CRN 6029679/21.

What followed did not occur within a single institution.

The documentary trail passes through the Metropolitan Police, national policing structures associated with Operation Talla, Government vaccine-security functions within DHSC, the Solicitors Regulation Authority and, ultimately, the Solicitors Disciplinary Tribunal.

There are important points at which those institutional paths intersect.

There are also points at which the documentary accounts appear to sit uneasily beside one another.

An allegation described publicly as not being under investigation was internally screened in and subsequently acknowledged by the Metropolitan Police as having been *“reviewed/investigated”*.

National policing records refer to *“guidance to not record”* and describe that guidance as *“a success”*.

DHSC developed what its own records later called an *“interest”* in Hyland and referred to *“the steps we took with the Solicitors Regulation Authority*”.

A Government vaccine-security official sought urgent regulatory action against him.

Government records subsequently refer to a *“non branded list”* of *“PJH law targets”* for transmission to the SRA.

Regulatory proceedings followed.

There are further matters which require investigation rather than assumption. One member of the Tribunal which ultimately determined Hyland's case, Gary Gracey, had a documented association with Minerva Advisory Group dating from 2017.

Minerva's own website subsequently publicly profiled Paul Easter, the DHSC vaccine-security official who had complained about Hyland to the SRA.

The presently available evidence does not establish when Easter's Minerva association began, whether it pre-dated Hyland's July 2024 hearing, or whether Easter and Gracey knew one another. This paper therefore does not suggest otherwise.

The missing chronology is itself the question which now requires an answer.

None of these matters, individually or collectively, entitles me to declare that a coordinated operation against Philip Hyland has been proved and I do not do so. Neither however, does the absence of proof of coordination require the public to disregard documented institutional connections, chronological tensions or unanswered questions.

There is a particular reason for that caution to operate in both directions.

In May 2021, Dominic Cummings told Parliament that those responsible for the vaccine programme had effectively been instructed to treat it as a *“wartime”* undertaking, to *“Ignore rules”*, and that if lawyers got in the way, Government would find ways of “*bulldozing them out of your way.”*

That statement does not prove what subsequently happened to Philip Hyland. It does not establish that he was one of the lawyers contemplated by Cummings, nor that any institution was instructed to act against him.

Once the subsequent documentary chronology is known, those words cannot responsibly be treated as though they had never been spoken.

The question raised by this paper is therefore narrower, and more important:

What actually happened when a solicitor placed himself in the path of one of the most important Government programmes of the period?

Perhaps every institutional decision examined in these pages was reached independently, properly and lawfully.

Perhaps every chronological convergence was coincidence.

Perhaps every apparent contradiction has a straightforward explanation.

If so, the records should establish it.

This paper does not ask the reader to substitute suspicion for evidence. Quite the opposite. It identifies what is evidenced, distinguishes it from what is not and asks those institutions which possess the remaining records to provide the missing answers.

There eventually comes a point at which *“coincidence”* ceases to be an explanation and becomes a proposition which itself requires evidential support.

The documents have brought us to that point.

The institutions must now explain the chronology.

Ian Clayton

WHEN A LAWYER GETS IN THE WAY

A Forensic Analysis of Philip Hyland, CRN 6029679/21, Operation Talla, DHSC, the SRA and the Solicitors Disciplinary Tribunal

An evidential report on the red flags which now require explanation

1. Purpose of this report

This report concerns a sequence of events which, when examined separately, may each admit of an entirely proper explanation.

The difficulty arises when they are placed in chronological order and examined together.

At its centre is solicitor Philip Hyland.

During 2021 and early 2022, Hyland was involved in legal challenges concerning Government Covid policy, vaccination requirements and the lawfulness of Government guidance. He was also one of those associated with the serious criminal allegations reported to the Metropolitan Police on 20 December 2021 under CRN 6029679/21.

What followed is now partly documented through Metropolitan Police records, national policing material, Operation Talla documents, DHSC disclosures, SRA correspondence and a judgment of the Solicitors Disciplinary Tribunal.

The emerging picture does not prove a centrally directed conspiracy to remove a troublesome solicitor.

It would be irresponsible to say that it does.

What it does establish is a series of institutional intersections which are sufficiently unusual, sufficiently closely timed and sufficiently consequential that they can no longer safely be considered in isolation.

There is another reason why the question matters.

On 26 May 2021, Dominic Cummings gave evidence to Parliament about the Government's vaccine programme. Describing what he called a *"formal thing"*, he said Kate Bingham had effectively been told to report directly to the Prime Minister rather than through the Department of Health. He then described the instruction given to her:

"Treat this like a wartime thing. Ignore rules. If lawyers get in your way, come to us and we'll find ways of bulldozing them out of your way."

Those are Cummings' words.

Those words do not prove that any lawyer was subsequently treated unlawfully, but, once a lawyer challenging the vaccine programme becomes the subject of a documented Government vaccine-security interest, a Government-connected complaint to his regulator, regulatory prosecution and disciplinary sanction, the Parliamentary words acquire a significance they did not possess when considered in isolation.

The issue is no longer rhetorical - It is evidential.

2. The first red flag: *“Ignore rules”* and lawyers getting in the way

Cummings' evidence requires careful treatment.

He did not say: break the law. Nor did he identify Philip Hyland. Nor did he say that professional regulators should be deployed against lawyers.

But, he did describe an arrangement in which the vaccine programme was to be treated as a wartime operation, conventional rules were to be disregarded and lawyers who became obstacles could be brought to central Government so that ways could be found to “bulldoze” them aside.

The critical unanswered questions have always been:

- *What did that mean operationally?*

- *Which rules?*
- *Which lawyers?*
- *What constituted "getting in the way"?*
- *Who were "us"?*
- *What forms could "bulldozing" take?*

These questions became materially more important after December 2021.

Hyland was not simply commenting on Government policy from the sidelines. He was acting as a solicitor in challenges touching Covid policies, including vaccination, exemptions and public-law questions. He also became involved with CRN 6029679/21.

The chronology subsequently produced exactly the sort of situation that Cummings' evidence makes worthy of investigation: A practising lawyer placing himself directly across a politically and operationally important Government programme.

That does not establish causation.

It establishes the relevance of asking whether the "bulldozing" language ever had a practical manifestation.

3. The second red flag: What actually happened under CRN 6029679/21?

The Metropolitan Police position is itself difficult.

The subsequent documentary record substantially supports Hyland's contemporaneous understanding that an investigation or evidential review was taking place.

The MPS internal record records the matter as *“Screened In”*, transferred to CID and screened in *“for further investigation”*; a detective constable was allocated under detective-sergeant supervision; evidence continued to be submitted; and the MPS subsequently recorded consideration of the material provided.

There is more.

Detective Superintendent Tor Garnett later wrote:

“If you, or any of the complainants, were informed that the allegation was subject to an investigation, this would not have been an inaccurate representation; the allegations were, in fact, being reviewed/investigated to determine whether a crime should be recorded.”

That statement is extremely important.

Yet on 21 February 2022, the SRA told Hyland that the Metropolitan Police had confirmed that *“no investigation has been opened”*. Hyland replied in deliberately qualified terms:

“As far as we are concerned an investigation or evidence review is underway.”

The later MPS description - “reviewed/investigated” is remarkably close to Hyland's own formulation.

The red flag is therefore not semantic.

It is this:

How did a materially accurate description of the MPS process become part of the basis upon which Hyland was characterised as disseminating misinformation?

That question leads directly into national policing.

4. The third red flag: Operation Talla was already engaged

CRN 6029679/21 was not confined to one London police station.

By 12 January 2022, Operation Talla Gold and Silver had convened a national meeting involving representatives of police forces across England and Wales concerning members of the public presenting criminal allegations relating to Covid vaccination.

On 18 January, ACC Owen Weatherill, acting as Operation Talla Silver and National Mobilisation Coordinator, circulated a national communication to Chief Constables and Force Gold Officers.

The Chief Constables' Council material shows that the Metropolitan Police crime report was nationally significant: Its assessment was expected and the outcome of a peer review relating to it was to be shared with chiefs nationally.

That is an important fact.

CRN 6029679/21 was not merely a local crime report being administratively considered at Hammersmith.

It had entered the national Covid policing environment.

5. The fourth red flag: *"the guidance to not record"*

Then comes one of the most troubling policing documents.

An internal NPCC/NPoCC communication of 14 February 2022 records:

"We have not been formally recording numbers of attempts to follow this process across the country. Our latest assessment shows that it is still occurring, it would appear that the guidance to not record has been a success as only one additional report has been created..."

The importance of that sentence is difficult to overstate.

It records not merely the existence of something described as *“guidance to not record”*, but an assessment of its success by reference to the small number of additional reports created.

The documents presently available do not establish its entire legal basis, authorship or scope. Those remain unresolved.

The existence of the phrase itself is documentary fact.

This creates an obvious public-interest problem.

Police normally assess allegations according to law, evidence and crime-recording rules. Yet here, within a national policing structure, an internal communication appears to assess the effectiveness of guidance by reference to whether additional reports were being prevented from being created.

That requires explanation.

Particularly because CRN 6029679/21 was the existing report around which national attention was already centred.

6. The fifth red flag: National policing was working with DHSC vaccine security

The divide between policing and Government health machinery becomes even more important on 18 January 2022.

The Weatherill material records NPoCC working closely with NHS and DHSC teams responsible for vaccine-programme security.

This does not prove that NPoCC instructed DHSC to complain about Hyland.

It does not prove that Paul Easter received information from Operation Talla.

It does not prove that police directed regulatory action.

But it does establish something essential:

The institutional interface existed. National policing and DHSC vaccine-programme security were communicating.

That removes any basis for assuming that what happened within DHSC and what happened within Operation Talla necessarily belonged to entirely separate institutional worlds.

The investigative question is therefore no longer:

Could information have passed between them?

It is:

What information did pass between them?

7. The sixth red flag: DHSC had already developed an *"interest"* in Hyland

DHSC's own records now fundamentally change the picture.

Before Paul Easter complained to the SRA, DHSC was already holding and processing information concerning Hyland, his litigation and CRN 6029679/21.

On 7 February 2022, DHSC material referred to a case involving him as:

"the vexatious legal case we discussed."

On 14 February - the day before the SRA complaint, material identifying Hyland and CRN 6029679/21 entered an email process titled:

"Standardised Formal Reporting Escalation Process of Security Issues to NVOC"

DHSC's own terminology therefore places information concerning a practising solicitor and his involvement with a crime report within a formal security escalation process.

Then, months later, DHSC described the history in extraordinarily revealing language:

“The other attachments here give the background to our interest in this individual and the steps we took with the Solicitors Regulation Authority.”

Those are DHSC's words:

“our interest in this individual”

and

“the steps we took with the Solicitors Regulation Authority.”

That documentary description presents a materially broader institutional picture than the simple narrative of a concerned individual independently making an SRA complaint.

8. The seventh red flag: Paul Easter was not an ordinary complainant

On 15 February 2022, Paul Easter submitted the SRA report concerning PJH Law.

He described PJH Law as involved with *“Anti-Vaccination groups”*, accused it of disseminating *“misinformation”*, identified Hyland's sharing of the Metropolitan Police crime reference number and his claim that there was an active investigation, and said:

“action by the SRA must be taken as a matter of urgency.”

Easter was not presenting himself as an ordinary member of the public.

He identified himself as working for DHSC on behalf of HMG assessing risks to the UK vaccine programme.

That is crucial.

A Government vaccine-security official was seeking urgent professional regulatory action against a solicitor whose activities were being assessed as risks associated with the vaccine programme.

That does not, of itself, make the complaint improper, but its provenance plainly mattered.

9. The eighth red flag: Security Notice 37 and the word *"fraudulent"*

On the very same date as Easter's complaint, DHSC records Security Notice 37.

The disclosed material states:

"Documentation referencing an ongoing police investigation into vaccine harm, or a legal case involving '[TPDW]' or 'PJH Law, should also be disregarded as fraudulent."

The timing is remarkable.

On 15 February:

DHSC vaccine-security material was characterising documentation referring to an ongoing police investigation involving PJH Law as *“fraudulent”*.

Meanwhile a DHSC/HMG vaccine-security figure was complaining to the SRA that Hyland was disseminating *“misinformation”* by claiming there was an active police investigation.

Yet later MPS material states that describing the matter as being investigated would not have been inaccurate, because the allegations were in fact being *“reviewed/investigated”*.

That is a major chronological tension.

- *Where did DHSC obtain its understanding of the MPS position?*
- *Was Easter relying upon the same information?*
- *Was the information accurate?*
- *Did policing supply it?*
- *And was the SRA later given a materially incomplete account of the true MPS handling?*

These are no longer speculative questions. They arise directly from conflicting documentary records.

10. The ninth red flag: The Government assessment continued

The complaint was not the end of DHSC involvement.

On 17 February, DHSC held a document titled:

“ANTI-VACCINATION COORDINATION IN CRIME REFERENCE NUMBER 6029679/21 CAMPAIGN”

Its stated purpose was to provide background concerning increased coordination in the UK anti-vaccination movement during the CRN campaign and potential impact upon the supply chain.

Philip Hyland was expressly named.

Then further security material followed.

On 28 February, DHSC records Security Notice 39 concerning anti-vaccination coordination and CRN 6029679/21.

On 3 March, another assessment described its purpose as providing evidence of increased coordination during the CRN campaign and potential impacts upon the Covid vaccination programme. Hyland was again identified.

That distinction matters profoundly.

Complaint is one thing.

Continuing Government security assessment of the solicitor after the complaint is something else.

11. The tenth red flag: 21 February 2022

Then comes the date which requires particular attention.

21 February 2022.

On that date, Detective Superintendent Tor Garnett signed the Metropolitan Police communication setting out the MPS position concerning CRN 6029679/21 and stating that no further action would be taken.

On that same date, Emma Lessard informed Philip Hyland that the SRA would investigate the complaints concerning him.

Same date does not establish same cause.

That proposition must be repeated.

However, the issue becomes more significant because the status of CRN 6029679/21 subsequently became relevant to the SRA's allegations about Hyland.

The necessary questions are:

- *Who knew what, and when?*
- *When did DHSC learn the MPS position?*
- *When did the SRA?*
- *From whom?*
- *What version of the MPS position was communicated?*
- *And did it accurately reflect the internal police records?*

12. The eleventh red flag: The *“non branded list”*

One day later, 22 February, DHSC records an internal Teams conversation:

“Can you send me a non branded list of [TPDW]/PJH law targets since last Tues pse that I can send on to SRA”

Every word matters.

- *“non branded”*
- *“PJH law targets”*
- *“send on to SRA”*

There may be an entirely legitimate operational explanation, but before one can accept it, basic questions require answers.

- *What were the “targets”?*
- *Who created the list?*
- *What branding was removed?*
- *Why?*
- *Was the SRA told its true provenance?*
- *What was ultimately transmitted?*
- *Was Hyland shown it?*
- *Was the relevant regulatory decision-maker told where the material had originated?*

This single message creates a potentially serious disclosure and provenance issue.

13. The twelfth red flag: *“no clear connection to one another”*

The SRA subsequently characterised complaints concerning Hyland and PJH Law as having been received from members of the public and organisations:

“with no clear connection to one another.”

That assertion now requires justification.

The evidence does not prove that all complainants coordinated.

There is presently no evidence establishing a common plan encompassing DHSC, the BMA, Lord Clement-Jones, policing and others.

But we now know that DHSC had an active vaccine-security interest in the matter; national policing was working with DHSC vaccine-programme security; DHSC complained to the SRA; DHSC continued to process and analyse Hyland; and a DHSC official requested a *“non branded list”* of PJH Law *“targets”* to send to the SRA.

Against that documentary background, *“no clear connection to one another”* cannot simply be treated as self-proving.

What enquiries did the SRA actually undertake before reaching that conclusion?

14. The thirteenth red flag: the SRA appears to have prosecuted matters closely aligned with Government policy

The later SDT judgment adds another dimension.

One allegation against Hyland concerned his 17 December 2021 letter to the MHRA.

The SRA expressly alleged that the letter had been written for the:

“ulterior purpose of promoting a campaign against the government’s public health measures.”

Hyland's counsel, Dr Peter Fields, directly confronted the institutional problem.

He submitted that the SRA had effectively substituted itself into the shoes of the potential Government defendant, repeated Government Legal Service arguments and gone on to seek disciplinary sanction against the solicitor who had written the letter before action.

Dr Fields further argued that the SRA was effectively taking a position on the integrity of Government policy such that opposing Government policy risked being treated as a breach of professional principles.

That argument acquires greater significance when read against DHSC's subsequently disclosed records, because we now know that Government's involvement was considerably more extensive than the bare existence of Easter's complaint.

15. The fourteenth red flag: Disclosure was already squarely in issue before the SDT

The judgment itself records that Dr Fields alleged misleading statements and non-disclosure in the SRA's Rule 12 case.

At paragraph 16.100, the judgment records his submission that the SRA omitted crucial information, including:

“the fact that the Department of Health and Social Care (DHSC) was the complainant in this case.”

He characterised that as a significant breach of Hyland's right to a fair hearing.

This is particularly important now.

The subsequent DHSC disclosures do not merely confirm that somebody associated with DHSC complained.

They reveal a preceding and continuing institutional history.

- Security escalation.
- Security notices.
- A *"coordination"* assessment.
- Continued information processing.
- A *"non branded list"*.
- And DHSC's own later description of *"our interest"* and *"the steps we took with the Solicitors Regulation Authority."*

The question must therefore be asked:

Did the SDT receive the true institutional history of the evidence upon which the SRA proceedings had developed?

16. The fifteenth red flag: A subsequently evidenced Minerva connection which requires its own chronology

The SDT judgment identifies the three-member panel which determined Hyland's substantive hearing on 1 to 4 July 2024:

- Mr E Nally, Chair;
- Mr C Cowx;
- and Mr G Gracey.

Separate documentary material establishes that Gary Gracey's professional association with Minerva Advisory Group Ltd substantially pre-dated those proceedings. His captured professional profile records him as Team Leader at Minerva from July 2017 and also records his appointment as a part-time SDT lay member from May 2022.

A separate captured page from Minerva Advisory Group's own website establishes that Paul Easter was also publicly profiled by Minerva.

There is, however, a crucial chronological limitation.

The presently available capture of Easter's Minerva page is dated 15 July 2024. That is approximately two weeks after the substantive SDT hearing of 1 to 4 July 2024.

The page establishes that Minerva publicly associated itself with Easter by 15 July 2024; it does not, without further evidence, establish when that association began.

Accordingly, the presently available evidence does not establish that Easter was associated with Minerva when he complained to the SRA in February 2022. Nor does it yet establish that his association with Minerva existed when Gracey sat upon Hyland's SDT panel earlier in July 2024.

That distinction is fundamental.

The evidence therefore presently establishes:

- Gracey to Minerva from July 2017.
- Gracey to SDT from May 2022.
- Gracey to Hyland's substantive SDT panel, 1 to 4 July 2024.
- Easter to being publicly profiled by Minerva by 15 July 2024.

What remains unknown is when Easter's relationship with Minerva actually commenced.

That is now an important documentary question.

If Easter's association began before the July 2024 hearing, the potential relevance to panel disclosure and apparent impartiality would require consideration.

If it began only afterwards, the significance would be materially different.

The documents presently available therefore justify investigation of the connection. They do not justify retrospectively inserting an Easter – Minerva - Gracey nexus into the 2022 to July 2024 chronology before its dates have been established.

17. The sixteenth red flag: When did Easter's Minerva association begin?

The first question is therefore not whether an Easter - Gracey Minerva connection was disclosed to the parties before the SDT hearing.

The logically prior question is:

When did Paul Easter first become associated with Minerva Advisory Group?

The answer is potentially important.

If Easter's association commenced after 4 July 2024, the presently identified common organisational connection could not, without some separate earlier relationship, have been something requiring disclosure by Gracey during Hyland's substantive hearing.

If Easter's association commenced before 1 July 2024, further questions arise: Whether Easter and Gracey's respective Minerva associations overlapped; whether they knew or worked with one another; whether Gracey knew of Easter's role in the regulatory history concerning Hyland; and whether any matter arose which ought properly to have been disclosed before Gracey participated in the hearing.

If evidence were ultimately to establish that Easter's Minerva association extended back to February 2022 or earlier, the chronology would require still closer examination because it would place the common organisational environment at or before the time of Easter's complaint to the SRA.

None of those propositions has presently been established.

The Minerva evidence should therefore be treated as an investigative lead supported by primary documentary material, rather than evidence of an established conflict at the time of the SDT proceedings.

The necessary evidence should be obtainable. Historic Minerva personnel records, archived webpages, engagement records, professional biographies and other contemporaneous material should establish when Easter's association began and its nature.

Only once that date is established can the significance of the common Minerva connection properly be assessed.

18. The seventeenth red flag: the Tribunal's findings depended heavily upon evaluative judgments about motive

This is not a peripheral technicality because the SDT's conclusions involved substantial assessments of Hyland's motivation and character.

The Tribunal ultimately referred to a *"hubristic mindset"*, described his conduct as involving *"weaponisation"* of the law and found an *"unchecked campaigning fervor"* had deprived him of objectivity and proportion. It imposed a £15,000 fine and ultimately £66,500 in costs.

Those are intensely evaluative conclusions.

At the same time, the Tribunal acknowledged that the scientific material contained within Hyland's MHRA letter could legitimately be advanced. It said:

"irrespective as to whether one agreed or disagreed with those matters no reasonable objection could be made to this aspect of his letter"

and recognised that he was at liberty to advance those points based upon the evidence assembled.

This makes impartiality particularly important.

The Tribunal was not simply deciding whether a document existed.

It was judging motive, integrity, proportionality and professional character.

19. The eighteenth red flag: An SRA adjudicator had earlier taken a materially different view

There is another internal regulatory tension.

Anne-Marie Forbes had earlier refused an SRA application for conditions.

She expressly recognised:

"Mr Hyland has an opposing view to the vaccine roll out."

But she found he had not encouraged criminal behaviour or unlawful conduct and considered that there was little evidence that he had been predatory, abused the litigation process, misled a court or taken advantage of an unrepresented third party.

The SDT was not bound by her decision.

Different decision-makers can legitimately reach different conclusions.

The contrast matters though because the ultimate case turned heavily upon characterisations of precisely the sort Forbes had considered insufficient to justify conditions.

That amplifies the importance of knowing what changed, what additional evidence was subsequently introduced, where it came from and whether its provenance was fully disclosed.

20. The nineteenth red flag: The wider criminal-justice command environment

There is an additional structural context which should not be overstated but cannot be ignored.

Gregor McGill (Crown Prosecution Service) - His witness statement to the UK Covid-19 Inquiry records that the principal CPS mechanism for cross-government coordination during the pandemic was the Criminal Justice System Strategic Command - CJSSC.

He describes CJSSC's role as:

“take overall responsibility for the multi-agency management of an incident or crisis, establish a common policy and strategic framework within which each contributing agencies command function will operate.”

He further records that Public Health England was represented within CJSSC Gold.

This does not establish direct DHSC membership of CJSSC (although it should be noted that Public Health England was an Executive Agency within the DHSC). Nor does it prove CJSSC involvement in Hyland's case.

It does however demonstrate the extent to which public-health and justice structures were institutionally interconnected during the pandemic.

CJSSC itself continued until approximately February 2022 - the very period in which the events examined in this report were unfolding.

That is contextual evidence, not proof of case-specific involvement.

Its proper significance is to reinforce one point: Institutional separation cannot simply be assumed. It has to be demonstrated from the records.

21. What this evidence does not prove

This report should not be misunderstood.

- It does not establish that Dominic Cummings ordered anyone to interfere with Philip Hyland.
- It does not establish that Operation Talla instructed DHSC to complain to the SRA.
- It does not establish that the MPS closed CRN 6029679/21 because of Government pressure.
- It does not establish that Paul Easter and Gary Gracey discussed Hyland.
- It does not establish that Gracey was actually biased.
- It does not establish that every SRA complainant operated pursuant to a coordinated Government strategy.

- And it does not establish that every person involved acted improperly.

Those propositions require evidence.

But, neither does evidential restraint require blindness to what has now been documented.

22. What the evidence does establish

The documented chronology establishes something narrower but extremely significant.

- A lawyer was challenging Government Covid and vaccination policy.
- The same lawyer became associated with a nationally significant criminal report concerning the vaccine programme.
- That crime report entered Operation Talla command structures.
- National policing was working with DHSC vaccine-programme security.
- An internal policing communication referred to *“guidance to not record”* and described it as *“a success.”*
- DHSC developed a documented *“interest”* in Hyland.
- His activities entered a formal Government security escalation process.

- A DHSC/HMG vaccine-security official then urgently reported him to his professional regulator.
- The same governmental environment described documentation relating to his claimed police investigation as *“fraudulent”*.
- DHSC continued to assess him after the complaint.
- DHSC discussed sending a *“non branded list”* of *“PJH law targets”* to the SRA.
- The SRA subsequently prosecuted him in proceedings which expressly characterised his conduct as promoting a campaign against Government public-health measures.
- Disclosure of DHSC provenance became an issue in those proceedings.
- One member of the tribunal which ultimately judged Hyland, Gary Gracey, had a documented association with Minerva Advisory Group dating from 2017. A Minerva webpage captured shortly after Hyland's July 2024 SDT hearing also publicly profiles the DHSC vaccine-security complainant, Paul Easter. The presently available evidence does not establish when Easter's Minerva association began and therefore does not establish that the two men's Minerva associations overlapped before or during Hyland's hearing. Establishing that date is now an important investigative requirement.

That is the record.

Those documented facts are sufficiently concerning without adding any proposition which the evidence does not establish.

23. The *“bulldozing”* question revisited

We can now return to Dominic Cummings.

In May 2021, he described lawyers who obstructed the vaccine programme being “bulldozed” out of the way.

Months later, Philip Hyland placed himself directly in the path of Government Covid policy through litigation, correspondence, criminal allegations and public challenges.

Then came the institutional sequence described above.

One must remain very careful here.

Sequence is not causation, but equally, coincidence is not an evidential answer.

The appropriate question is therefore not:

Can we prove that Philip Hyland was one of the lawyers Cummings had in mind?

There is no evidence of that.

The appropriate question is:

Did any of the Government machinery subsequently applied to Hyland amount, in practical operation, to the kind of removal of a legal obstacle that Cummings had publicly described?

That question can only be answered by disclosure.

24. The questions which now require answers

The institutions concerned should now answer, independently and by reference to contemporaneous records:

- **MPS:** What was the precise operational and legal status of CRN 6029679/21 at each material date, and how did an internally screened-in, CID-handled and *"reviewed/investigated"* matter come to be represented externally as one in which no investigation had been opened?
- **NPCC/NPoCC/Operation Talla:** What exactly was the *"guidance to not record"*; who authorised it; what was its legal basis; how was *"success"* measured; and what relationship did it have to CRN 6029679/21?
- **Policing and DHSC:** What information concerning CRN 6029679/21, Philip Hyland, PJH Law or related legal

challenges passed between national policing structures and DHSC vaccine-programme security?

- **DHSC:** Who first established the Department's *“interest”* in Hyland, and what were all of the *“steps we took with the Solicitors Regulation Authority”*?
- **DHSC:** What was the 14 February formal security escalation; who authorised it; what was NVOC; and who received the material?
- **DHSC:** What evidential basis justified describing material concerning an ongoing vaccine-harm investigation or PJH Law as *“fraudulent”*?
- **Paul Easter/DHSC:** Was Easter's 15 February SRA complaint his personal initiative, or was it discussed, authorised, encouraged or supplied with information through DHSC?
- **DHSC/SRA:** What exactly was the *“non branded list”* of *“PJH law targets”*, why was branding removed, what was transmitted and was the SRA told its true provenance?
- **SRA:** On what evidential basis did the regulator say its complainants had *“no clear connection to one another”*?
- **SRA:** What material concerning Easter, DHSC, Clement-Jones, the BMA, Scorer, policing and other institutional sources was known, held, received or withheld at each decision-making stage?

- **SRA/Capsticks:** What disclosure exercise was undertaken and did the SDT receive the complete evidential provenance of the proceedings?
- **SDT:** What conflict-of-interest checks were undertaken before Gary Gracey was selected to sit upon Philip Hyland's substantive hearing on 1 to 4 July 2024 and what professional interests or associations were declared by him?
- **Gary Gracey/Minerva:** What was the nature and duration of Gracey's association with Minerva Advisory Group and did he know Paul Easter personally or professionally at any time before, during or after the July 2024 hearing?
- **Paul Easter/Minerva:** On precisely what date did Easter first become associated with Minerva Advisory Group; in what capacity; and did that association exist before his SRA complaint of 15 February 2022, before Gracey's appointment to the SDT in May 2022, or before Hyland's substantive hearing on 1 to 4 July 2024?
- **SDT/SRA:** If Easter's Minerva association is established to have pre-dated the substantive hearing, was the resulting common organisational association with Gracey known to Gracey, the SDT administration, the SRA or any other participant; was it disclosed; and was any consideration given to its potential relevance to Gracey's participation?

- **Central Government:** What did Cummings' instruction to *“ignore rules”* and find ways of *“bulldozing”* lawyers out of the vaccine programme's path mean in actual operational practice?
- **Central Government:** Were professional regulators, policing structures, security functions or other state bodies ever discussed as means of dealing with lawyers or regulated professionals considered obstacles to the vaccine programme?
- **CJSSC:** Who represented the public-health function at Gold level after PHE ceased operating and did information concerning vaccine-related legal challenges, CRN 6029679/21 or professional-regulatory issues enter that command environment?

These questions should not be answered with institutional reassurance.

They require documents, dates, names and decision records.

25. Conclusion - The issue is now institutional accountability

The public does not need to accept Philip Hyland's views on Covid matters.

It does not need to agree with the legal cases he pursued.

It does not need to agree with the allegations contained in CRN 6029679/21.

That is not the point.

A much more basic constitutional principle is involved: A lawyer must be able to challenge Government without Government being able to use its own institutional machinery improperly to neutralise the challenge.

- If the machinery examined in this report operated independently, lawfully and coincidentally, the records should demonstrate that.
- If the SRA independently investigated legitimate professional complaints, the records should show it.
- If DHSC merely supplied proper evidence to a regulator, the records should show it.
- If policing and DHSC vaccine security exchanged nothing concerning Hyland, the records should show it.
- If Gary Gracey's Minerva association gave rise to no relevant conflict or disclosure issue, the records should establish that.
- If the *"guidance to not record"* was lawful and proper, the records should explain it.
- And if Dominic Cummings' extraordinary Parliamentary description of lawyers being "bulldozed" aside was merely

colourful language for lawful administrative problem-solving, Government should be capable of explaining what it meant.

What is no longer satisfactory is institutional silence accompanied by an insistence that each event be considered in isolation.

The documents themselves have removed that option.

- They show national policing coordination.
- They show Government vaccine-security interest.
- They show regulatory intervention.
- They show information flows.
- They show security escalation.
- They show a request for unbranded material to be sent to a regulator.
- They show a contested account of whether a police investigation existed.
- And they show that an adjudicator who had been associated with Minerva Advisory Group since 2017 subsequently sat upon Hyland's substantive disciplinary hearing, while a Minerva webpage captured shortly afterwards also identifies the DHSC vaccine-security official who had complained about Hyland to the SRA. What has not yet been established—and must not be assumed, is when Easter's Minerva association began,

whether the two men's respective associations overlapped before the hearing, or whether they knew one another.

None of those facts alone determines what happened.

Together, they demand that what happened be investigated.

The central question can therefore be stated simply:

Was Philip Hyland merely independently regulated for professional misconduct after challenging Government Covid policy, or does the documentary chronology reveal that a lawyer who got in the way was, in practical effect, bulldozed out of it?

We should not guess the answer.

The institutions holding the records should now provide it.

Ian Clayton

20 August 2026

SUPPLEMENT No. 1

TO: THE CASE OF PHILIP HYLAND EXAMINED

SUPPLEMENTARY EVIDENTIAL UPDATE

THE MINERVA ADVISORY GROUP: PAUL EASTER AND GARY GRACEY - A MATERIAL CHRONOLOGICAL DEVELOPMENT

21 August 2026

Purpose of this Supplement

This bulletin is issued as Supplement No. 1 to the paper, THE CASE OF PHILIP HYLAND EXAMINED.

Its purpose is narrow but important.

Following publication and compilation of the principal paper, further examination of archived material relating to the Minerva Advisory Group has materially clarified the chronology concerning Paul Easter and Gary Gracey.

The significance lies not merely in establishing that both men were associated with the same organisation. The newly identified archived material indicates that their respective associations with Minerva were publicly recorded before Paul Easter's February 2022 approach to the Solicitors Regulation Authority concerning PJH Law and continued through the period culminating in Gary Gracey's participation in the Solicitors Disciplinary Tribunal hearing concerning Philip Hyland in July 2024.

That chronology requires the evidential position recorded in the principal paper to be supplemented.

1. The Earlier Evidential Position

The principal paper identified a potentially relevant connection between Paul Easter and Gary Gracey through the Minerva Advisory Group.

Caution was required as to chronology.

In particular, it was necessary to avoid suggesting that a subsequently identified organisational association necessarily existed at the time of the events beginning in February 2022.

Further archived material now substantially resolves that chronological question.

2. The 25 January 2022 Archived Record

A Wayback Machine capture dated 25 January 2022 of the Minerva Advisory Group website publicly identifies both men within the Minerva structure.

The archived material identifies:

Gary Gracey - "Policing/ Counter Terrorism"

and:

Paul Easter - "counter Terrorism/Intelligence"

Separate archived Minerva profile material describes Gracey's extensive policing, intelligence and counter-terrorism background.

The archived profile for Easter similarly records extensive counter-terrorism and intelligence experience, including roles associated with the UK Joint Defence School of Intelligence, the Joint Terrorism Analysis Centre and Cabinet Office Crisis Machinery.

The significance of the date is immediate.

25 January 2022 predates Paul Easter's approach to the SRA concerning PJH Law.

The common Minerva association therefore cannot properly be characterised merely as a connection arising after the material events.

3. Paul Easter's Approach to the SRA

As documented in the principal paper, on 15 February 2022, Paul Easter approached the Solicitors Regulation Authority concerning PJH Law.

That communication forms part of a wider DHSC documentary sequence concerning Philip Hyland and his firm.

The principal paper examines, among other matters, DHSC records referring to:

“our interest in this individual and the steps we took with the Solicitors Regulation Authority.”

The newly clarified Minerva chronology means that, when Easter made his approach to the SRA, both Easter and Gracey were already publicly presented within the same specialist advisory organisation.

That is a fact.

What, if anything, followed from that association is a separate evidential question.

4. Gary Gracey's Subsequent SDT Role

Gary Gracey subsequently became a lay member of the Solicitors Disciplinary Tribunal.

Of particular significance, he was then one of the three members comprising the Tribunal which heard the substantive proceedings:

SOLICITORS REGULATION AUTHORITY LTD

and

PHILIP JULIAN PAUL HYLAND

The judgment records the Tribunal as:

Mr E Nally (in the Chair)

Mr C Cowx

Mr G Gracey

The hearing took place between 1 and 4 July 2024.

Accordingly, the relevant chronology now contains three established points:

- 25 January 2022 - archived Minerva material publicly associates both Easter and Gracey with Minerva.
- 15 February 2022 - Easter approaches the SRA concerning PJH Law.

- 1 to 4 July 2024 - Gracey sits as a member of the Tribunal determining the substantive SRA proceedings against Philip Hyland.

But, the newly examined archive also provides a fourth point.

5. The 19 July 2024 Archived Record

A further Wayback Machine capture dated 19 July 2024 continues publicly to identify both men within Minerva's organisational structure.

Gracey is shown in connection with:

“Policing/ Counter Terrorism”

while Easter is identified in connection with:

“counter Terrorism/Intelligence”

This capture post-dates the 1 to 4 July 2024 SDT hearing.

The evidenced Minerva overlap therefore appears to straddle the material period.

Put chronologically:

- Easter and Gracey are publicly associated through Minerva before Easter's SRA complaint
- Easter approaches the SRA concerning PJH Law.

- Gracey subsequently becomes involved as an SDT member.
- Gracey sits upon Philip Hyland's substantive disciplinary hearing.
- archived Minerva material continues publicly to present both Easter and Gracey within the Minerva structure after that hearing.

That is materially different from discovering only a later or incidental association between the two men.

6. What the Evidence Establishes

The evidence presently establishes that:

- Paul Easter and Gary Gracey were publicly presented within the Minerva Advisory Group structure by 25 January 2022;
- their identified specialist areas, counter-terrorism, intelligence and policing, were closely related;
- the documented Minerva association therefore existed before Easter's 15 February 2022 approach to the SRA concerning PJH Law;
- Gracey subsequently sat as a member of the SDT determining the substantive regulatory proceedings against Philip Hyland in July 2024; and

- archived Minerva material dated 19 July 2024 continued publicly to identify both men within the organisation.

Those matters can now properly form part of the evidential chronology.

7. What the Evidence Does Not Establish

The distinction between evidence and inference remains essential.

The material presently examined does not, without further evidence, establish that:

- Paul Easter and Gary Gracey personally knew one another;
- they worked together on any particular Minerva project;
- they communicated concerning Philip Hyland or PJH Law;
- Gracey knew that Easter had approached the SRA concerning PJH Law;
- Easter had any involvement in Gracey's appointment to, or participation in, the SDT;
- Gracey's decision-making was influenced by the Minerva association; or
- the constitution or determination of the Tribunal was improper.

No such conclusion is made in this Supplement.

The importance of the new evidence is instead that it identifies an objectively verifiable organisational association whose chronology now overlaps the events under examination.

8. The Disclosure Question

That gives rise to a legitimate and considerably narrower question:

What was the nature and extent of the professional association between Paul Easter and Gary Gracey through the Minerva Advisory Group during the period relevant to Philip Hyland's case?

That leads naturally to a second:

Was Gary Gracey aware, when sitting upon Philip Hyland's case, of Paul Easter's role in approaching the SRA concerning PJH Law?

And a third:

Was the common Minerva association known to, considered by, or disclosed to the SDT, the SRA, Philip Hyland or the parties before Mr Gracey participated in determining the proceedings?

Those questions should not be answered by speculation.

They are capable of being answered by evidence.

9. Why the Chronology Matters

The significance of this development must be understood within the wider documentary chronology examined in *THE CASE OF PHILIP HYLAND EXAMINED*.

The principal paper concerns an unusual sequence involving Government interest in a solicitor engaged in challenges concerning Covid policy; DHSC security structures; the criminal complaint recorded as CRN 6029679/21; an approach from within the Government vaccine-security environment to the solicitor's professional regulator; subsequent regulatory proceedings; and questions concerning disclosure.

Against that background, the identity and professional connections of those materially involved cannot simply be treated as biographical curiosities.

Equally, a professional association is not evidence of wrongdoing.

The correct forensic approach lies between those two positions.

Where an individual who initiated a regulatory complaint and an individual who subsequently participated in determining the resulting regulatory proceedings are shown by contemporaneous archived material to have been associated through the same specialist organisation across the relevant period, the existence, nature and disclosure of that association become legitimate matters for examination.

10. The Evidential Position Has Changed

The principal paper deliberately distinguished between what could be established and what remained uncertain.

That discipline must continue.

But it works in both directions.

Where uncertainty is subsequently resolved by contemporaneous documentary evidence, the evidential record must be updated accordingly.

The proposition can now safely be put no higher, but also no lower, than this:

Contemporaneous archived material places Paul Easter and Gary Gracey within the Minerva Advisory Group structure before Easter's February 2022 approach to the SRA concerning PJH Law. Gary Gracey subsequently sat upon Philip Hyland's substantive SDT proceedings in July 2024.

Archived Minerva material continued to present both men within that structure after the hearing.

The existence of that chronology does not determine its significance. It requires its significance to be examined.

Conclusion

This Supplement makes no allegation of misconduct against Paul Easter, Gary Gracey, the Solicitors Regulation Authority or the Solicitors Disciplinary Tribunal arising from the Minerva association.

It does something more limited - It records newly clarified evidence.

The dates are now important.

The Minerva association did not merely follow the events.

On the presently available archived record, it preceded Easter's approach to the SRA and continued through the period in which Gracey ultimately sat upon Philip Hyland's disciplinary proceedings.

The appropriate response is therefore neither accusation nor dismissal.

It is disclosure.

- *What was the relationship?*

- *What did each man know?*
- *When did he know it?*
- *Was the association disclosed?*
- *And, if it was not disclosed, why not?*

Those questions now arise from the documentary chronology itself.

They should be answered in the same way - By evidence.

Ian Clayton

21 August 2026