

The email below has today, 26 September 2026, at 06:03, been sent to the recipient parties identified.

I have not included the attached documents in this publically accessible version. Those documents will, however, be released at a later date.

I am making this email available now, in the public interest and in the interests of constitutional integrity.

Ian Clayton

26 September 2026

**TIME SENSITIVE - SEEKING SUBSTANTIVE RESPONSE BY 31
OCTOBER 2026**

For the urgent attention of:

- 1. Sarah Rapson (CEO, SRA)***
- 2. Samantha Jones (Permanent Secretary, DHSC)***
- 3. Ray Dhanowa (Clerk and Chief Legal Adviser, Solicitors
Disciplinary Tribunal)***

Re: Simultaneous Institutional Notice and Request for Candid, Substantive and Document-Based Responses

I write simultaneously to the Department of Health and Social Care, the Solicitors Regulation Authority and the Solicitors Disciplinary Tribunal concerning the documentary chronology examined in my recent Report Supplement which is within the attached relevant document:

The Case of Philip Hyland Examined and Supplement No. 1 - The Minerva Advisory Group: Paul Easter and Gary Gracey - A Material Chronological Development

Each of your institutions has already been approached separately.

DHSC has already been provided with the principal evidential report and asked to account for its documented institutional “*interest*” in Philip Hyland, the “*steps we took with the Solicitors Regulation Authority*”, the request for a “*non branded list*” of “*PJH law targets*” to be sent to the SRA, the associated vaccine-security material and the relevant interface with policing, which is documented by way of primary police evidence in my possession.

The SRA has been asked to reconsider the factual assurance given on 9 July 2025 that it had not been approached by Government or its representatives to discourage or obstruct solicitors challenging Covid-related policies, in light of subsequently identified documentary evidence concerning the complaint made by Paul Easter.

The SDT has separately been provided with the said Supplement No. 1, referred to above, concerning the contemporaneously evidenced Minerva Advisory Group association of Paul Easter and Gary Gracey, including the fact that the documented association existed before Mr Easter's February 2022 approach to the SRA and continued through the period in which Mr Gracey sat as one of the three members determining Mr Hyland's substantive disciplinary proceedings in July 2024.

Until now, I have approached each institution separately because each possesses different records, different responsibilities and different knowledge.

The point has now been reached, however, where the evidential questions materially intersect.

It is therefore appropriate that each institution should now know what has been placed before the others.

There is now a documentary chronology crossing all three institutions which contains matters capable of factual answer.

Those answers cannot sensibly be supplied by considering each institution in artificial isolation from the others.

For completeness, I attach to this correspondence the original SRA Report Form dated 15 February 2022 submitted by Paul Easter concerning Philip Hyland and PJH Law.

I do so because it is preferable that each recipient considers the primary underlying document itself rather than merely my description of it.

The form identifies Mr Easter's organisation as the Department of Health and Social Care, provides his DHSC email address and records his position in express terms:

"I work for the DHSC on behalf of HMG assessing risks to the UK Vaccine programme."

Mr Easter went on to describe “*Anti-vaccination groups*” as presenting a “*significant and identified risk to the programme*” and alleged that PJH Law was involved in disseminating misinformation.

Importantly, the activities identified within the complaint were not confined to social-media commentary. They included legal advice, drafting applications, representation in court, preparation for hearings, assembling counsel and legal support, obtaining expert and witness evidence, engaging private investigators and pursuing evidential material concerning vaccination-related issues.

The complaint then stated that:

“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.”

It concluded:

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

The document also records that the complained-of conduct had been brought to the attention of DHSC.

That primary document must now be considered alongside DHSC's own later documentary record.

DHSC materials refer to:

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

The same documentary history includes the request:

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

and contemporaneous security material concerning Philip Hyland, PJH Law and CRN 6029679/21.

That is why DHSC's involvement can no longer adequately be described, without further explanation, as the isolated act of an individual employee making an independent complaint.

The Department's own records disclose a materially broader institutional chronology.

There is then a separate and important issue concerning the true Metropolitan Police position in relation to CRN 6029679/21.

The status of that crime report was not peripheral to the regulatory history. It formed part of the factual basis upon which Philip Hyland and PJH Law were characterised as disseminating misinformation and as being unable to distinguish between a crime reference number and an open police investigation.

The evidential position now available is materially different from the impression conveyed by the Metropolitan Police in February 2022.

In May 2022, Detective Superintendent Tor Garnett stated expressly that, if the complainants had been informed that the allegations were subject to investigation, that:

“would not have been an inaccurate representation”

because:

“the allegations were, in fact, being reviewed/investigated to determine whether a crime should be recorded.”

More recently, in September 2026, PC Amanda Cousins of Metropolitan Police Professional Standards has likewise made clear that an investigation did take place in relation to CRN 6029679/21.

Those clarifications do not stand alone.

Internal Metropolitan Police records now in my possession corroborate the position asserted by Detective Superintendent Garnett and PC Cousins and record investigative activity/handling concerning the matter.

Accordingly, the proposition that Mr Hyland was wrong to describe an investigation or evidential review as taking place can no longer be treated as an adequate or complete account of the Metropolitan Police position.

This is not a semantic distinction. It concerns whether a materially accurate description of police activity was subsequently treated as misinformation in circumstances where later Metropolitan Police statements and internal records indicate that investigative activity did, in fact, occur.

That issue requires particular attention because the supposed absence of an investigation was expressly relied upon in Mr Easter's

complaint and became part of the wider institutional narrative concerning Mr Hyland.

The SRA's own later assurance also now requires consideration against that background.

On 9 July 2025, I was told by the SRA:

“We are independent of government, and we have not been approached by it or its representatives to discourage or obstruct solicitors challenging COVID 19 related policies.”

That assurance now has to be considered alongside the established fact that Paul Easter had approached the SRA in February 2022, identifying himself as working for DHSC:

“on behalf of HMG assessing risks to the UK Vaccine programme”

and seeking urgent regulatory action against PJH Law.

That makes the existence, provenance, treatment and institutional context of that governmental contact plainly material to the assurance subsequently provided by the SRA.

There is then the separate but related SDT question.

Contemporaneous archived material now places both Paul Easter and Gary Gracey within the Minerva Advisory Group structure by 25 January 2022.

Mr Easter subsequently approached the SRA concerning PJH Law on 15 February 2022.

Mr Gracey subsequently sat as one of three members of the SDT determining the substantive disciplinary proceedings against Philip Hyland between 1 and 4 July 2024.

Archived Minerva material dated 19 July 2024 continued publicly to identify both men within that organisation.

The question is now whether that association between Mr Easter and Mr Gracey was known, considered or disclosed before Mr Gracey participated in determining the 2024 proceedings and whether any relevant conflict or apparent-conflict assessment was undertaken.

These matters are capable of being answered by evidence.

That is now what is required.

I therefore invite each institution to provide a candid, substantive and document-based response, addressing those matters which fall within its own knowledge, records and institutional responsibility.

By “*candid*” I mean precisely that.

If an earlier institutional assurance requires qualification, it should be qualified.

If a factual proposition advanced in my reports is wrong, it should be identified and corrected by reference to the contemporaneous record.

If relevant information was not known at the time, that should be said.

If records establish an entirely proper explanation, they should be identified.

If an issue remains under examination, that too can be stated plainly.

What would not now constitute an adequate response, would be a repetition of general institutional assurances which do not engage with the specific issues now placed before you.

Accordingly, I ask that the following matters are addressed.

Department of Health and Social Care

Please identify what constituted the Department's recorded "*interest*" in Philip Hyland and every material "step" taken with the Solicitors Regulation Authority.

Please identify the purpose, authorship, provenance and transmission of the "*non branded list*" of "*PJH law targets*", including what was sent, to whom, on whose authority and whether its governmental provenance was disclosed.

Please establish the relationship, if any, between the relevant security escalation, Security Notices, assessments concerning CRN 6029679/21 and the decision to approach the SRA.

Please identify what relevant information passed between DHSC vaccine-programme security and policing bodies concerning Philip Hyland, PJH Law or CRN 6029679/21.

Please state whether DHSC subsequently received clarification from the Metropolitan Police that the allegations had in fact been reviewed or investigated and, if so, whether any internal security record, communication or material supplied to the SRA was corrected or qualified accordingly.

Please also confirm that potentially relevant contemporaneous records have been preserved.

Solicitors Regulation Authority

Please state whether Paul Easter's complaint, his stated governmental role and its institutional provenance were identified and considered before the assurance given to me on 9 July 2025 was provided.

If they were, please explain how the assurance was reconciled with that material.

If they were not, please identify what enquiries were undertaken before the assurance was provided.

Please identify all material received from DHSC, or persons acting within the Government vaccine-security environment, concerning Philip Hyland, PJH Law, CRN 6029679/21 or associated Covid-related legal activity, together with its provenance and subsequent regulatory use.

Please explain whether the SRA was made aware of the true provenance of any “*non branded*” material supplied to it and whether that provenance was disclosed to Mr Hyland and, where relevant, to the SDT.

Please also state whether, before or during the regulatory proceedings, the SRA obtained or was provided with the later Metropolitan Police position that the allegations had in fact been “*reviewed/investigated*” and, if so, what effect that had upon its assessment of the earlier allegation that Mr Hyland had disseminated misinformation concerning the existence of an investigation.

Solicitors Disciplinary Tribunal

Please state whether the documented Minerva association between Paul Easter and Gary Gracey was known to the Tribunal before or during Mr Hyland's substantive hearing.

Please state whether that association was disclosed to the parties or considered in connection with the constitution of the Tribunal.

Please identify whether any conflict, apparent-conflict, independence or impartiality assessment was undertaken and whether any contemporaneous record of that assessment exists.

Please also identify, insofar as the Tribunal record permits, what evidence concerning the true status of CRN 6029679/21 was placed before the Tribunal, including whether the Tribunal was provided with the Metropolitan Police position that the allegations had in fact been "*reviewed/investigated*".

I appreciate that the SDT has already been afforded a separate period within which to respond to Supplement No. 1 referred to above.

Nothing in this correspondence is intended to curtail that period or prejudice the Tribunal's response.

The purpose of this simultaneous communication is different. It is to ensure that the three institutions now have mutual visibility of the documentary questions which cross their respective records and responsibilities.

That is important because the answers should ultimately be capable of standing beside one another.

If DHSC says material was sent to the SRA, the SRA should be able to account for its receipt and treatment.

If the SRA says particular provenance was disclosed into the disciplinary process, the SDT record should be capable of confirming that.

If the SDT says a matter was known, disclosed or considered, the corresponding institutional records should be capable of demonstrating it.

That is not an unreasonable standard. It is simply evidential consistency.

There are two further matters of present procedural importance which I consider it appropriate to place before all three recipients.

First, issues arising from the documentary chronology addressed in this correspondence are presently being placed before a police force which was not directly involved in CRN 6029679/21.

That step is being taken in light of primary evidence which has emerged since early 2025 and which continues to emerge.

I do not presently propose to identify that police force within this correspondence, nor do I suggest that the fact of such engagement determines any issue raised here.

I mention it because the matters under examination have now developed beyond the original institutional context and are being considered against an expanding primary evidential record.

Second, there is a separate and upcoming meeting scheduled for November 2026 at which matters materially connected with this chronology are expected to be discussed by senior-level individuals.

I am not presently in a position to identify those attendees because of the sensitivity of the issues to be considered.

In those circumstances, I consider it important that the institutional record is clarified in advance of that November meeting. **I therefore invite each recipient to provide its full substantive response no later than 31 October 2026.**

I consider that period to be ample for each institution to examine its own records, identify any necessary internal decision-maker or responsible office and provide a considered, evidence-based account.

If any recipient considers that it cannot reasonably provide a full substantive response by that date, I ask that it explains why, identifies what work remains outstanding and provides a firm alternative date for completion.

The purpose of that timetable is not to manufacture urgency where none exists. It is to ensure that the relevant institutional positions are properly established before further senior-level consideration of these matters takes place in November.

I am not asking any institution to adopt my analysis.

I am asking each to account candidly and transparently for the part of the documentary history which lies within its own knowledge and records.

Non-engagement ought not to continue against a background of unanswered questions.

The relevant documents, dates, individuals and institutional intersections have now been identified with precision.

Each institution has been afforded an opportunity to correct the record and each now knows that the other institutions have been placed on notice of the same evidential chronology.

The purpose of this correspondence is not to manufacture inference from institutional silence. It is to establish the institutional record.

For completeness, I attach the following documents:

- (a) Paul Easter - SRA Report Form dated 15 February 2022;
- (b) The Case of Philip Hyland Examined (including Supplements No 1 and No 2).

I would be grateful if receipt of this correspondence and the attachments could be acknowledged and if each institution would identify the office or senior official responsible for considering the matters raised.

This correspondence is sent simultaneously because the documentary history is now simultaneously relevant to all three institutions.

The appropriate next step is no longer speculation. It is a candid institutional account, supported by the contemporaneous record.

I look forward to receiving one from each of you.

Yours sincerely

Ian Clayton

Lead Investigator

Ethical Approach UK

cc: Philip Hyland (PJH Law)