

The "legal blackmail" business: inside a P2P settlement factory

By [Nate Anderson](#) | Published 8 months ago

UK pornographer Jasper Feversham was fed up. The Internets were sharing his films, quality work like *Catch Her in the Eye*, *Skin City*, and *MILF Magic 3*. He wanted revenge—or at least a cut. So Feversham signed on to a relatively new scheme: track down BitTorrent infringers, convert their IP addresses into real names, and blast out warning letters threatening litigation if they didn't cough up a few hundred quid.

"Much looking forward to sending letters to these f—ers," he wrote in an email earlier this year.

The law firm he ended up with was ACS Law, run by middle-aged lawyer Andrew Crossley. ACS Law had, after a process of attrition, become one of the only UK firms to engage in such work. Unfortunately for Crossley, mainstream film studios had decided that suing file-sharers brought little apart from negative publicity, and so Crossley was left defending a heap of pornography, some video games, and a few musical tracks.

Crossley parleyed the porn into national celebrity—or perhaps "infamy" would be a better word. Earlier this year, Crossley was excoriated in the House of Lords by Lord Lucas of Crudwell and Dingwall—yes, I know—for what "amounts to blackmail... The cost of defending one of these things is reckoned to be £10,000. You can get away with asking for £500 or £1,000 and be paid on most occasions without any effort having to be made to really establish guilt. It is straightforward legal blackmail."

Lord Lucas went on to offer an amendment to the (now-passed) Digital Economy Bill, titled "Remedy for groundless threats of copyright infringement proceedings."

But the Lords were just getting started. Lord Young of Norwood Green likened firms such as ACS Law to "rogue wheel-clampers, if I can use that analogy," while the Earl of Erroll railed against the way that "ACS Law and others threaten people with huge costs in court unless they roll over and give lots of money up front, so that people end up settling out of court. The problem is the cost of justice, which is a huge block. We have to remember that."

Lord Clement-Jones also called out Crossley's work. "Like many noble Lords, I have had an enormous postbag about the activities of this law firm. It is easy to say 'of certain law firms,' but this is the only one that I have been written to about... ACS seems to specialize in picking up bogus copyright claims and then harassing innocent householders and demanding £500, £650, or whatever—a round sum, in any event—in order to settle."

May go for a Lambo or Ferrari. I am so predictable!

That was only the start of Crossley's problems. In the last 12 months, Crossley has been targeted by the Blackpool municipal government, dogged by journalists, hounded by a major consumer group, and hauled up before the Solicitors Regulation Authority for disciplinary proceedings. Baffled, angry people write his office daily, denying any knowledge of his charges. He has blacklisted his own ex-wife in his e-mail client, demanding that she cut off all contact with him forever. Clients press him to pay up. His own data suppliers are, he fears, out to screw him, and Crossley harbors the suspicion that he could make far more money in America, where fat statutory damage awards mean he could demand even more cash from his targets.

And, just to put a ridiculous cherry atop his plate of problems, the streets department in Westminster, London—where Crossley keeps his office—went after ACS Law because some of their office waste mysteriously "ended up in the public highway."

"We are a tightly resourced small firm," Crossley complained as he wheedled the fine in half.

But not *that* tightly resourced. Crossley bragged over e-mail earlier this year that he "spent much of the weekend looking for a new car. Finances are much better so can put £20-30k down. May go for a Lambo or Ferrari. I am so predictable!" He began looking at new homes, including a gated property with "five double bedrooms, three bathrooms, modern kitchen and four reception rooms."

Keeping track of all the details might not be Crossley's strong suit. As he wrote (one assumes in jest) when a dispute about financial issues came up, "I am not an accountant, true. But I am a genius and everything I do is brilliant. You must understand that!"

He's also dogged. With all the hate, a lesser man might have buckled—as did other law firms like Tilly Bailey & Irvine, which dropped its own "settlement letter" business in April 2010 after "adverse publicity." Instead, Crossley plows ahead, defending work like *To the Manner Porn* and *Weapons of Mass Satisfaction*; indeed, he seems rather philosophical about his lot in life.

"Sorry to bombard you with more things to deal with," he wrote recently to a colleague, "but this business seems to have its share of complications." Indeed it does—and the complications get even more complicated when you anger the anonymous masses at 4chan, who promptly crash your website, expose your private e-mail, and in doing so shed a powerful and unflattering light on the real practice of P2P lawyering. Drawing on thousands of personal e-mails, Ars takes you inside the world of ACS Law, reveal its connections to the US Copyright Group, and discovers just what Andrew Crossley thinks of *Godfather 3*.

Spoiler: "*Godfather 3* is not quite as bad as I remember."

Operation Payback

"This will be a calm, coordinated display of blood," said the initial call to action. "We will not be merciful. We will not be newfags."

Users of the free-wheeling (to put it mildly) Internet community 4chan last week implemented "Operation Payback," a distributed denial of service attack against various anti-piracy groups the 4channers didn't like. The RIAA was hit. The MPAA was hit. But after some big targets, Operation Payback moved on to smaller firms, including ACS Law.

I have far more concern over the fact of my train turning up 10 minutes late or having to queue for a coffee than them wasting my time with this sort of rubbish.

After the group's data flood knocked the ACS Law website offline for a few hours, UK tech site The Register [called up Andrew Crossley](#) to ask him about the attack. The site was "only down for a few hours," Crossley said. "I have far more concern over the fact of my train turning up 10 minutes late or having to queue for a coffee than them wasting my time with this sort of rubbish."

He has something to be concerned about now. After these comments, Operation Payback hit ACS Law a second time, knocking out the site. In the process of bringing it back up, someone exposed the server's directory structure through the Web instead of showing the website itself. Those conducting Operation Payback immediately moved in and grabbed a 350MB archive of ACS Law e-mails, then threw the entire mass up on sites like The Pirate Bay.

This is more than a matter of mere embarrassment. The UK has tougher data protection laws than the US, and the country's Information Commissioner has already made it clear that ACS Law could be on the hook for hundreds of thousands of pounds. That's because, in addition to his iTunes receipts ("Hooray for iPads. I love mine," Crossley says at one point) and Amazon purchase orders, the e-mails include numerous attachments filled with all manner of private information: names, addresses, payment details, passwords, revenue splits, business deals.

All of which is horrible, terrible, awful news—unless you want to know how a firm like ACS Law actually works.

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Meet the accused

After reading through many hundreds of e-mails, one thing becomes clear: ACS Law operates a rather boring business. That is, there's no juvenile gloating, no sinister cackling, no profanity-laced tirades (OK, there are a few tirades). The dominant picture is of a sober operation that spends most of its time in mind-numbing scanning and database work. They even reply personally to letters. Sure, all this work is in the service of dreck like *Granny F—*, but this is just a *business*, and Crossley is just a middle-aged solicitor trying to run an efficient operation.

But the effects of this operation on those accused of infringement are remarkable. The e-mail trove is stuffed with anguished pleas like this:

I was in total shock after receiving the letter I received from you today as explained in the telephone conversation. I will say that I was not the person responsible for this infringement. The only person who it could have been would be my son who is [name redacted]. I would never entertain the idea of downloading such a thing—in fact I do not even know how to download any type of software. I only use the internet for Ebay and emails. I also go on dating sites and facebook. This is where my knowledge of computers stops. I do not understand what P2P is....

At the time of the download, to my knowledge my son was visiting my home. I have no idea what he was looking at on my computer. I must add that I do not tolerate any such pornographic material. This letter has upset me greatly and I have spoken to my ex husband who also called yourself with regard to this matter.

Most of the notices seem to have gone to parents, as one would expect from a program targeting ISP account holders. But many of the parents seem baffled:

I have today received a legal notification from you that a pornographic film was downloaded from my internet connection in October 2009. I immediately phoned your contact number and was told to put my comments in writing. I am obviously shocked both at this alleged illegal activity and the fact that the title appears to be of an offensive nature. I can confirm that i have no knowledge of this download being carried out at my home address. I have checked my computer and my sons computer for any reference to this file (using windows search function) and have found no trace. I have spoken to my two sons about downloads (They are 8 and 12) but obviously not about the nature of this file and to be honest they know even less than me. My oldest child has used i tunes and downloaded games from a site called friv.com but these claim to be free. Is this true? or will it also result in copyright issues ?

Others are offended at the titles they are accused of sharing:

I am no prude and can see what type of material something entitled *Granny F—* is. I am the father of 5 children, 3 of these under the age of 7, and to suggest i would have such material on a computer is what i find offensive. May i also add that i am very anti pornography, having been abused as a child by someone who would use porn films before abusing me .this is why i am totally anti porn.

Then come the "innocent infringers," though some of these explanations can feel a bit... strained.

on the date 16-11-2009 at 16.35 i was browsing the internet namely bt junkie ,without going into a long story i accidently pressed the download button for the copyright protected file british granny f— 5@6 which then opened my bittorrent client on my pc which the torrent is sent to with the forementioned file is attached. It normally takes a few minutes for the file to start downloading and before it did i realised what i had done and canceled the file preventing any copyright infringement from taking place. just by starting the download process would have been enough to leave my ip address listed. I hereby appologise for any inconvenience i have caused yourself or your client and can swear at no time was any part of the

forementioned copyright protected file downloaded onto my pc or shared with anyone else.

(I mean, haven't we all, at one time or another, accidentally been browsing BitTorrent sites and accidentally clicked on a film called *Granny F—*?)

Others took responsibility for their actions:

I am writing in response to the recent letter my father [name redacted] received on the 13.04.2010 based on the subject of infringement of copyright. I would firstly like to state that I am solely responsible for this and I [name redacted] take full responsibility. I have read through all the information that you have supplied and I understand how serious the matter is—since last year 2009 I have not downloaded any material as I understood how it was a bad thing to do and how it is killing out industry.

I do take responsibility for this issue and I would very much like to ask if the required payment of £495 could somehow possibly be reduced. The reason i am asking this is because I am currently a student and money is a big factor and getting by generally is a hard thing to do.

Indeed, many of the guilty appear to be kids. Some parents figured it out:

I would also like to also say that it was not my sons intention to fileshare this music and was unaware of how file sharing works as am I—I appreciate that this is no excuse but ask you to bear this in mind. As mentioned in previous correspondence from myself I am writing to again explain that my financial circumstances make it impossible for me to pay £400 in one go or even at £40 per month I am in extreme financial hardship with mounting debts and do not have any spare money - if you were to take this to court I would be unable to even pay the basic utility bills or even the necessary food bills.

If there's one great theme running through these letters, it's the poverty of the respondents. One is a "a single mum living of state benefits who cannot afford to pay any kind of money my daughter is very sorry for any problems caused," while another lives "in the hold of my bank overdraft my money is never my own. We at present find it very hard to make ends meet, at the moment I am trying to amass funds to pay our utility bills for this month and can not see any change in the near future." Students plead hardship due to school fees; many people claim to be unemployed.

But perhaps most creative are the letters that make no attempt at argument. These are sheer vitriol. One stands out among the rest:

Go f— your mum you stupid pakistani black jew. You zimbabwean immigrant.

So listen up fat f—, don't send me another letter. If you do send me another f—ing letter, I will rape your mum against the wall and I will blow up your house and kill you all in a terrorist attack.

In addition, I want a £3500 cheque written to me for the inconvenience [sic] you have caused me.

If you do not reply to this email with a confirmation that you will pay me, I will hunt you down and stab you in the back and blow your d— up.

Creative, in an unhinged way. If you had thoughts about going into P2P litigation, consider the sheer migraine-inducingness of getting such messages on a daily basis. Indeed, after reading the correspondence, it's not hard to see why one paralegal who worked at ACS Law during the summer of 2010 told a friend there was "no chance in hell" she would go back.

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In which everyone complains

When you make people this angry, they tend to complain—and that's just what happened to Crossley. Earlier this year, UK Consumer group Which? noted that it had "heard from more than 150 consumers who believed they had been wrongly accused." One letter writer said, "My 78 year-old father yesterday received a letter from ACS law demanding £500 for a porn file he is alleged to have downloaded. He doesn't even know what file sharing or bittorrent is so has certainly not done this himself or given anyone else permission to use his computer to do such a thing."

Reporters began following up on such stories. One reporter, from the *Daily Echo* in Bournemouth, e-mailed Crossley about a particular local case—an Aberdeen man who spent most of his time near Bournemouth caring for an ill relative.

"He is accused of downloading the track 'Evacuate the Dancefloor' on October 2 last year," write the reporter. "Mr [name redacted] says he was in Dorset at the time, not in Aberdeen where his IP address is registered, and that he has airline tickets and medical appointment records to prove it. He says he leaves his internet connection switched off when he's away and no one else has access to it. He has no interest in pop music."

There were other problems. One of the firms providing Crossley with data on infringers then began to get balky, wanting more money than Crossley wanted to pay before turning over its information. "This guy is stupid," Crossley noted in an email to a colleague. "And he MUST release ALL data to us. It is ours. We have a deal. I will go to court this afternoon if he does not give it to us."

As if this wasn't enough, Crossley was subject to repeated, probing questions from the Solicitors Regulatory Authority, which controls lawyers in England and Wales. The group had received 400+ complaints about his firm's behavior. This was a big deal; the SRA could put Crossley out of business, and he had been in trouble with them before.

Back in 2002 and 2006, Crossley was disciplined by the Solicitors Disciplinary Tribunal, which ordered him to pay around £5,500 in fines and penalties. In both of these cases, Crossley had not submitted an accountant's yearly report on his firm—needed under UK rules to show that a lawyer does not improperly hang on to client funds.

The problem appeared to stem from a lack of cash. At one point, he told the tribunal handling his case that his lack of paperwork was "because he had been unable to raise the money to pay the accountant who retained the papers."

Crossley suffered "an extended period of clinical depression in 1999" and then a stroke in 2000. "The effect of the stroke, which caused him to lose his sight altogether for a brief period, was that the Respondent could not work full-time for a period and as a consequence he quickly got into financial difficulties."

Any bundle of documents sent by a law 'firm' headed with the words 'Letter of claim; Infringement of Copyright' is likely to cause distress

The new investigation wasn't about accounting, but about claims that Crossley was shaking down his targets. Things were bad enough that one of his ACS Law employees noted, "We are constantly being reminded by infringers that we are under investigation by the SRA."

To defend himself, Crossley secured the services of another lawyer. "I am meeting with my retained lawyer today regarding the sra," he wrote. "He is Andrew Hopper QC and he literally wrote the sra rules!"

But Andrew Hopper, QC couldn't save Crossley from the SRA, even if he did write their rules. On August 20, the SRA referred Crossley—once more—to the disciplinary tribunal.

"Absolutely predictable political decision to 'fast track' and give the problem to someone else; therefore SRA is seen by Which etc to be 'doing the right thing' without them actually having to think at all or justify the decision," sniffed Hopper.

The Blackpool municipal government also objected to Crossley's tactics. ACS Law was contacted by Blackpool, which complained that local citizens "have been significantly distressed by your letter and feel compelled to pay. You say that your letters are not demands but compromise agreements, but any bundle of documents sent by a law 'firm' headed with the words 'Letter of claim; Infringement of Copyright' is likely to cause distress and mislead the consumer into making a transactional decision they would not otherwise make... None of the complainants have any recollection of having downloaded the tracks in dispute."

The Blackpool official then notes that under UK law, damages are fixed at "economic loss, either realised or potential." When it comes to music tracks, the loss equals "the approximate market value of the track as a single download—79p. Without further transparency as to the legal costs mentioned above, I would imagine that this would be sufficient to bring the matter to a close."

Meet the US Copyright Group

Indeed, the justice of this remark about damages haunts Crossley. One of his own legal advisors tells him that "establishing damages beyond the value of the gross profit of one copy of the work is problematic." In other words, a few pence for music. The advisor goes on to note that the one court case which would seem to prove the opposite "has, in my opinion, about as much legal force as a *Sun* newspaper headline regarding the licentious behaviour of a D list celebrity."

We should get to work on this, I have massive copyright in the US. And in the US there is minimum statutory damages

"Therefore, it is my belief that the rights holder can only rely on the damage resulting from making a single copy of the work in infringement," he concludes, because of the difficulty in proving just how much (if any) "sharing" of the material with others took place. Lawyers are of course free to ask the courts for huge awards, but this carries the risk "that, in a defended case with competent opposing expert witnesses, the court will reject the application."

In other words, actually *going to court* would net very little money. Sending out letters and collecting a few hundred pounds is a much better business, which may explain why Crossley doesn't seem to sue people who refuse to settle. Yes, he promises to do so at some point, and the emails do show that he's considering hiring a litigator, but the campaign has been going over for quite some time now with no court action. (This is a common theme in the complaints against him; Crossley insists he's just trying to help everyone stay out of court.)

If only Crossley lived in America! "What is interesting is that it is the US model I want," he wrote earlier this year after hearing the news that the US Copyright Group was now filing mass Doe lawsuits against alleged movie pirates. "We should get to work on this, I have massive copyright in the US. And in the US there is minimum statutory damages."

Yes, statutory damages—under which copyright holders don't need to prove actual economic harm at all. The idea was that some infringement was simply too hard to quantify, but a system designed for commercial use has now been turned against US college students, leading to \$1.92 million judgments in one case and \$675,000 in another. (Both were so egregious that the judges involved tossed out the monetary amounts.) This is the system Crossley wants to profit from.

So he contacted Tom Dunlap of the Virginia law firm Dunlap, Grubb, and Weaver (DGW). DGW helped put the "US Copyright Group" together and does all the litigation on its cases, which include films like *The Hurt Locker* and *Far Cry*. Crossley wanted some kind of partnership.

"I own and operate the most prolific firm in the UK that identifies and pursues copyright infringements committed through peer to peer networks," he bragged to Dunlap. "I have a growing number of clients, existing and potential, including US based copyright owners and are actively looking to expand our work into the US, especially because of the ability to receive statutory damages for infringement and jury-awarded assessments of damages. I note that you act for Guardaley, a client of the person who introduced the file sharing work previously carried out by Davenport Lyons in the UK to my firm. It is a small world!

"I have substantial amounts of data, which I wish to exploit appropriately in the US and would very much like to speak with you with a view to exploring the possibility of an ongoing working relationship, to our mutual benefit. If this is of interest to you, please let me know."

The lawyers did a call. Later, they met up in Cannes, France at a conference. Crossley later booked a table at Le Baoli, which he described in another email to someone else as "the best club I have ever been in in my life! Le Baoli in Cannes! a million models in one place!" But the club was not serving dinner that night, and in the confusion over rescheduling, Crossley missed the DGW lawyers for dinner. But he did email later to say that "we are mailshotting all major uk film and music companies with the ucg [US Copyright Group] so you should get some calls soon." He seems to have believed a partnership was in the offing.

In a blog post soon after, Crossley announced his return from Cannes and said that "a new joint working relationship with US-based attorneys has opened up the North American region to our clients for identification and pursuit of illegal file sharing of their products." He was going to begin "cooperation with a newly-formed organization, the United Copyright Group."

That reference was scrubbed from the post two days later; Crossley had apparently been a bit too exuberant. Tom Dunlap told Ars that his firm was not working with ACS Law. He also told CNET this week that "the IT company [which the law firm uses to track file sharers] does not do anything for ACS Law."

But is that true?

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The mysterious "Guardaley"

The "IT firm" Dunlap mentions appears to be Guardaley, the BitTorrent detection company cited in US Copyright Group court filings. Guardaley identifies the IP addresses of suspected infringers, logs all necessary data, and turns this information over to the lawyers. But the firm is deeply implicated in the US Copyright Group, not just a mere contractor.

Guardaley is based in Germany, where it is run by Benjamin Perino and Patrick Achache, though the firm has registered itself as a UK business, too, with an unlikely address in an Aldermaston office park.

In a [document](#) (PDF) filed with the White House's new "IP Czar" earlier this year, Perino is listed as the "managing director" of Guardaley, and Dunlap called on the expertise of his subordinate Achache as an expert witness who swore to the accuracy of the company's data in court filings. But then, in April of this year, another court filing appeared in the *Far Cry* case. Here, Perino declared that he was "one of four Managers of the US Copyright Group (USCG) which is a private company dedicated to anti-piracy efforts in the motion picture industry involving unlawful torrent downloading."

Virginia state records seen by Ars show that DGW set up "US Copyright Group" as a legal entity, though it appears to be some sort of partnership between the law firm and the techies at Guardaley.

Here's where it gets weird: this summer, after falling out with his detection company, Crossley turned to a young man named Terence, who is referenced above and who helped Crossley get into the settlement letter business. Terence then helped Crossley sign on with... Guardaley.

Crossley writes about a "guy I know called Patrick who is good friends with Terence. Patrick is based in Germany with a high quality system. We get no hidden charges and I will drop my charges to fully absorb the extra cost."

He needed to rush the deal through, because the pornographer Jasper Feversham was upset that detection of his works had stopped; Crossley needed a new data supplier as soon as he could get one.

The deal, for 15 percent gross, was done through Terence; no emails emerge from Guardaley at all. Even Crossley found the situation odd. "Also, I note that Guardaley in the UK is registered as a dormant company. That needs to be changed if that is the contracting company. And why is there a company in the UK and why its it registered in Aldermaston? What's all that about? (as Peter Kay would say)."

In response, Terence offers some intriguing details. "GL [Guardaley] has a number of companies for monitoring and different ones are used depending on content and jurisdiction. The data supplier for [ACS Law client] Mediacat will be a Swiss company to manage PR (you know how it is!)."

Despite using the same tech, Guardaley apparently operates under numerous names. This means that each of the entities it creates needs a separate "expert's report" verifying that the system is accurate. The one drafted for Guardaley itself wouldn't work; a new expert must be found.

"An independent expert's report is in place for Guardaley, but your monitoring will be done through a different legal entity," wrote Terence. "This will mean that we will need to get a new one created. There will be no problems, as the technology used will be exactly the same as Guardaley's." And later: "We are in correspondence with an expert and the report can be finalised fairly quickly, well in advance of the first court order."

So, while Tom Dunlap suggests that "Guardaley" doesn't work for ACS Law, some other company with a new name and the same tech is. This gives Guardaley a hand in the two major "settlement letter" factories in the US and UK.

Follow the money

Why bother with all these hassles, all the vitriol, all the criticism from the House of Lords? Money, for one. Despite Crossley's claim that he runs a "tightly resourced small firm," he appears to be doing alright for himself. After bragging about getting a "Lambo or Ferrari," Crossley instead settled on a Jeep Compass 2.4CVT.

(Update: According to a May 2010 e-mail, he also purchased a Bentley Arnage and "may buy a Ferrari F430 spider in a couple of months, but for cash.")

He spent the summer looking for a new high-end home to rent; one property sent over for his consideration was "a contemporary mansion with breath taking views in an elevated position on this exclusive gated estate. Arranged over three floors the accommodation comprises entrance hall, cloakroom, kitchen/breakfast room, utility room, large dining room, lounge with doors out onto patio and balcony and double bedroom suite. Stairs down to family room, four double bedrooms, shower room, family bathroom. Stairs down to indoor swimming pool, bar area/gym with doors out onto patio, double bedroom suite and storage room, double garage." Such places go from £6,000 to £8,000 a month; not a modest sum.

And he's looking to buy a bulldog puppy.

But despite the expenditures, there are also some signs that cash does not flow steadily in this business. "You seem to have ignored my previous e-mail, I am not happy and want some revenue in account," demands one client. "Everyone is getting their bit and I am owed £17k ffs."

He also pleads with one of his data suppliers to do some work for him, and quickly. "We need to run that data to maintain cashflow," he wrote. "Meanwhile, we have come under considerable pressure from [UK Internet provider] O2 to pay an outstanding invoice of £13,107.00 in respect of the supply of that data. As we have not been able to send any letters out we have not been able to collect any income from that data to meet ISP costs. This matter is very pressing as O2 have said that unless it is paid straight away they will release all their staff that they have retained to provide the data. This will have the effect of delaying very considerably the time for the provision of the finished data from the ISP. This will impact on all of us, most importantly for cashflow."

In an operation like this, the letters need to keep flowing out for the money to keep flowing in. As Crossley noted after seeing all the confusion among alleged infringers, "I have an idea. We should send a factsheet.... answering all the usual questions and dispelling some common misapprehensions as I think it will better inform people and increase revenue."

But that revenue comes from confused people like the accountant who wrote ACS Law, claiming utter bafflement and innocence. "Due to a lack of detail in your letter, I had to Google search the title to find information on what I'm being accused of downloading. I was astounded to find it to be PORN of pregnant women. Sick!"

"I am an Accountant who works normal office hours. There is NO CHANCE I would be at home downloading porn at 11:43 in the morning. Furthermore, on the date stipulated, I was in Brighton for the day with a client. I am the owner of my home, I live alone and have been doing so at the current address for the past 4 years. No-one has access to my property unless I'm present."

But the attitude at ACS Law is, as one legal advisor put it, "I sometimes think that we try to be too nice. That is not our purpose. If our clients want nice then they are likely to go to a priest or social worker."

So the Lords can say what they like, the consumer groups can rail, and Westminster can levy fines for trash in the streets, but the letters for *Pump Fiction* will continue.