

LEGAL AID AGENCY

High Cost Crime Appeal Decision – Single Adjudicator

Case: R v [REDACTED]

Appellant (firm/counsel): [REDACTED] Solicitors

LAA Respondent: [REDACTED]

Date of decision: [REDACTED] July 2026

Case Manager's original decision:

Category 3 non-fraud case.

Adjudicator's Decision:

Appeal refused.

Reasons:

R
v.
[REDACTED]
Single Adjudicator
[REDACTED] July 2026

1. This is an appeal by [REDACTED] acting on behalf of [REDACTED] against the Case Manager's decision that the case should be categorised as a Category 3 non-fraud VHCC.
2. The Appellant contends that the case satisfies Block A, Criterion 3, namely that the defendant's case is likely to attract national interest. The Case Manager does not accept that this criterion is satisfied. This is the only category criterion in dispute.
3. In determining this appeal, I have considered:
 - The Appellant's appeal representations dated 8 June 2026;
 - The Case Manager's appeal response dated 22 June 2026;
 - The witness statement of [REDACTED] of the Centre for the Analysis of Sexual Exploitation at Black Country Women's Aid;
 - The witness statement of retired Detective Inspector [REDACTED];
 - The Section 4(2) reporting restriction order supplied with the appeal;
 - The single Adjudicator's decision in R v Z dated 11 September 2022;
 - 2022 VHCC Specification for Organisations; and
 - 2022 VHCC Contract Guide.

4. [REDACTED] is charged with three counts:
 - (i) conspiracy to traffic persons within the United Kingdom for the purpose of sexual exploitation;
 - (ii) conspiracy to control prostitution for gain; and
 - (iii) conspiracy to transfer criminal property.
5. The prosecution case is that [REDACTED] and her husband, [REDACTED], controlled and operated an escort agency known as [REDACTED]. The Crown alleges that they were at the head of the conspiracy and describes [REDACTED] as acting as a “wing man” to her husband, being involved in the day-to-day operation of the business and the recruitment of escorts. It is also alleged that substantial funds generated by the operation were received into accounts associated with her.
6. The alleged offending spans approximately seven years. The Appellant relies upon a number of features said to demonstrate the scale and complexity of [REDACTED]'s case, including extradition and specialty issues arising from Spain; the admissibility and continuity of electronic material seized in Spain; forensic accountancy, computer evidence; telephone, banking and voice-recognition evidence; undercover policing and a proposed bad-character application concerning [REDACTED]'s earlier conviction.
7. The Appellant also states that the wider investigation concerns more than 20 defendants who are to be tried over four trials. The evidence of retired Detective Inspector [REDACTED] records that a database of approximately 760 telephone numbers was recovered and believed to contain details of potential victims. Following enquiries, approximately 260 women could be attributed and reasonable lines of enquiry pursued to locate and speak to them. Because of the scale and sensitivity of that task, West Midlands Police sought assistance from Black Country Women's Aid.
8. The only matter in dispute is whether the case satisfies Non-Fraud Block A, Criterion 3: “The case is likely to attract national interest.” Paragraph 4.18 of the 2022 VHCC Specification provides that the category is to be assessed on information which the Provider and prosecution can confirm as current fact, and not on what might occur at some future date. The criterion itself requires an assessment of likelihood, but that assessment must be grounded in presently established facts rather than in speculative future developments.
9. The relevant guidance explains that it is not enough merely to show that the defendant's case triggers publicity. The defence team must show that the central part of the case is a topic or issue of national social concern. The extent of media coverage is not the sole test, although high levels of publicity, particularly broadsheet coverage and editorial comment, are persuasive factors.
10. The guidance further provides that, where blanket reporting restrictions are in place,

consideration should be given to the type of publicity likely to be generated if those restrictions were lifted and to the reason for their imposition. Reference to the case, or to issues clearly triggered by it, in high-level public discussion such as parliamentary debate may support the criterion.

11. The Appellant submits that this case is distinguishable from R v Z because reporting restrictions have prevented the generation of evidence of continuing publicity which was absent in that appeal. It relies upon the period and scale of the investigation, the number of defendants and trials, the use of undercover officers and covert techniques, the alleged trafficking of vulnerable women, the sophistication of the online and financial arrangements, and the proposed reliance upon [REDACTED]'s previous conviction.
12. The Appellant states that, while [REDACTED] was awaiting extradition from Spain, the case was reported by The Times and the Daily Record. It also relies upon articles concerning her previous conviction for controlling prostitution for gain, which involved a serving police officer. It submits that the present proceedings would have generated sustained national reporting but for the reporting restrictions.
13. The Appellant further argues that the allegations engage wider issues of national concern, including the trafficking and sexual exploitation of vulnerable women, online safety, the responsibility of online companies for the criminal use of their services, and the use of financial institutions and allegedly fictitious companies to move the proceeds of crime.
14. The Case Manager accepts that trafficking and sexual exploitation are serious matters and subjects of established public concern but submits that the material does not show that this particular case has become, or is likely to become, a focal point for national concern. The LAA argues that the Appellant relies principally upon the inherent seriousness, complexity and scale of the alleged offending and upon speculation as to future publicity.
15. The Case Manager relies upon R v Z, which concerned allegations that young and vulnerable women were trafficked into the United Kingdom by an organised crime group and forced to work in the sex trade. The appeal in that matter was dismissed because the level of publicity and supporting material did not demonstrate that the particular prosecution was a topic or issue of national concern.
16. I accept that the non-fraud criterion is not expressed in the same terms as the fraud criterion, which requires both national publicity and widespread public concern. I have therefore not treated either sustained media reporting or editorial debate as a mandatory prerequisite. The question remains whether, on the current and confirmed material, [REDACTED]'s case is likely to attract national interest within the meaning of the guidance.
17. Human trafficking and the sexual exploitation of vulnerable women are plainly matters of national social concern. That general proposition does not, however, establish that every substantial prosecution involving those offences is likely to attract national interest. The

guidance requires the assessment to focus upon the defendant's case and upon the issues central to that case.

18. The scale of the present investigation is significant. The information concerning approximately 760 telephone numbers, the identification of reasonable lines of enquiry in relation to approximately 260 women, and the involvement of a specialist safeguarding organisation demonstrate a substantial and sensitive investigative exercise.
19. Those features are relevant to the assessment, but they principally demonstrate the scale and complexity of the prosecution. They do not, without further case-specific indicators, show that [REDACTED]'s case has become or is likely to become a focal point for national public concern. There is no evidence that the victim-identification process or the involvement of Black Country Women's Aid has generated wider public, political or editorial discussion, exposed an alleged institutional failure, or raised a novel issue extending beyond the prosecution itself.
20. The use of undercover officers, covert recordings, a listening device, anonymity applications, electronic evidence and international investigative measures adds to the complexity of the case. Such techniques may attract reporting when described at trial, but they are not in themselves unusual in serious organised crime prosecutions and do not establish national interest for the purposes of the category criterion.
21. I have considered carefully the reporting-restriction material and I accept that the order may explain the absence of reporting. However, the existence of a reporting restriction does not create a presumption of national interest. The current reporting identified by the Appellant is limited and some of the articles identified concern [REDACTED]'s earlier conviction. They relate to different proceedings many years earlier, in which the involvement of a serving police officer was itself a prominent feature. The admissibility of the conviction in the present proceedings remains subject to a bad-character application. Paragraph 4.18 requires the assessment to be based upon current confirmed facts, and I cannot assume either that the application will succeed or that the earlier conviction will become a public feature of this trial.
22. Even if the previous conviction is admitted, historic reporting of separate proceedings does not in itself establish likely national interest in the present case. I therefore attach limited weight to those articles for the purpose of categorisation.
23. I have taken account of the international dimension, the number of defendants, the proposed sequence of trials and the length of the investigation. Those matters may result in reporting at significant procedural stages and at the conclusion of the proceedings. Ordinary or milestone reporting of a serious criminal prosecution is not, however, the same as national interest within the meaning of the guidance.
24. *R v Z* is not binding upon this appeal. Paragraph 6.29 of the 2022 VHCC Specification provides that a Single Adjudicator's decision is binding only upon the particular appeal in which it is made. It is nevertheless a relevant comparison because it concerned the same criterion and

materially similar allegations of organised trafficking and sexual exploitation.

25. I recognise the factual differences. The present case appears larger, involves a substantial number of potential victims or witnesses, and is subject to reporting restrictions. However, the central weakness identified in R v Z remain present: the seriousness of the subject matter, limited case-specific publicity and the fact that comparable prosecutions have attracted press attention do not, without more, establish that this defendant's case is itself likely to attract national interest.
26. Reference is also made to decisions in R v L and R v SM. Copies of those decisions have not been provided in the material sent to me. In any event, appeal decisions are fact-specific and are not binding beyond an individual appeal. The descriptions given in the representations do not alter my assessment of the evidence in this case.
27. I do not consider that the Case Manager's decision depends upon an absolute requirement for continuous or unavoidable press coverage. Properly analysed, the difficulty for the Appellant is the absence of sufficiently persuasive, current and case-specific indicators that the present proceedings are likely to become a national focal point, as opposed to a serious and complex VHCC which may receive reporting at particular stages.
28. Taken cumulatively, the scale of the operation alleged by the Crown, the safeguarding exercise, the international elements, the covert-policing evidence, the historic conviction and the existence of the reporting restriction do not satisfy me that central to [REDACTED]'s case is a topic or issue which is likely to generate national interest in its own right. The Appellant's conclusion depends upon a degree of assumption which is not adequately supported by the current material.
29. I am not satisfied that Non-Fraud Block A, Criterion 3 has been met.
30. The Case Manager's decision to categorise the case as a Category 3 non-fraud VHCC is maintained.
31. The appeal is refused.

Single Adjudicator: [REDACTED]

Date: [REDACTED] July 2026