

1 Wednesday, 11 October 2023

2 (10.00 am)

3 **MR BEER:** Good morning, sir, can you see and hear  
4 me?

5 **SIR WYN WILLIAMS:** Yes, I can, thank you.

6 **MR BEER:** Thank you very much. May I call John  
7 Scott.

8 **JOHN MICHAEL SCOTT (sworn)**

9 **Questioned by MR BEER**

10 **MR BEER:** Good morning, Mr Scott. As you know, my  
11 name is Jason Beer and I ask questions on behalf  
12 of the Inquiry. Can you tell us your full name  
13 please?

14 **A.** John Michael Scott.

15 **Q.** Thank you very much for coming to assist the  
16 Inquiry in its work and for previously providing  
17 two witness statements to the Inquiry, we're  
18 very grateful. Before I ask you questions,  
19 about your witness statements, I think the  
20 Chairman will deliver a warning.

21 **SIR WYN WILLIAMS:** Mr Beer, can you tell me whether  
22 Mr Scott is legally represented this morning?

23 **MR BEER:** Yes, he is.

24 **SIR WYN WILLIAMS:** By a solicitor and counsel or  
25 just solicitor?

1

1 answer the question or whether the objection  
2 should be upheld.

3 As you've just heard me enquire, you are  
4 represented here today by counsel and  
5 a solicitor. No doubt, if the issue relating to  
6 self-incrimination arises, they will assist you  
7 and if, at any stage during the questioning, you  
8 wish to consult your lawyers about the  
9 privilege, you must tell me so that I can  
10 consider whether that is appropriate.

11 Do you understand what I've just sought to  
12 explain to you, Mr Scott?

13 **A.** Yes.

14 **SIR WYN WILLIAMS:** Thank you very much. Then please  
15 begin the questioning, Mr Beer.

16 **MR BEER:** Thank you very much, sir. Mr Scott, you  
17 should have in front of you a hard copy of  
18 a witness statement in your name, dated 12 May  
19 2023. If you turn to the last page of it, which  
20 should be page 47, there should be a signature;  
21 is that your signature?

22 **A.** Yes.

23 **Q.** With the corrections that you subsequently made  
24 in your second witness statement, more of which  
25 in a moment, are the contents of that first

3

1 **MR BEER:** Both.

2 **SIR WYN WILLIAMS:** Thank you.

3 Mr Scott, a witness at a public inquiry has  
4 the right to decline to answer a question put to  
5 him by counsel to the Inquiry, by any recognised  
6 legal representative or by me if there is a risk  
7 that the answer to that question would  
8 incriminate the witness.

9 This principle of our law is known in  
10 shorthand form as the privilege against  
11 self-incrimination. I have decided, Mr Scott,  
12 that fairness demands that I remind you of that  
13 principle before you give your evidence.  
14 However, I should also tell you that it is for  
15 you to make clear to me that, in respect of any  
16 question put to you, it is your wish to rely  
17 upon the privilege.

18 If, therefore, there are any questions put  
19 to you by any of the lawyers who asks you  
20 questions, or by me, which you do not wish to  
21 answer, on the grounds that the answer to such  
22 questions might incriminate you, you must tell  
23 me immediately after the question is put to you.  
24 At that point, I will consider your objection,  
25 and thereafter rule upon whether you should

2

1 statement true to the best of your knowledge and  
2 belief?

3 **A.** Yes.

4 **Q.** Thank you. For the purposes of the transcript  
5 the URN for that first witness statement is  
6 WITN08390100, there is no need to display that  
7 at the moment.

8 You produced a second witness statement of  
9 your own volition yesterday and there should be  
10 a hard copy of that in front of you; is that  
11 right?

12 **A.** That's correct, yes.

13 **Q.** If you go to -- I think it's the ninth page, is  
14 that right?

15 **A.** Page 10, yes.

16 **Q.** 10 in fact, okay, is that your signature?

17 **A.** Yes.

18 **Q.** Are the contents of that witness statement true  
19 to the best of your knowledge and belief?

20 **A.** Yes.

21 **Q.** The URN for that is WITN08390200. Again, there  
22 is no need to display it. Can I start, please,  
23 with your career, qualifications and experience.  
24 I think it's right, isn't it, that you were  
25 employed by the Post Office and cognate

4

1 organisations between February 1993 and  
 2 September 2016; is that right?  
 3 **A.** Yes.  
 4 **Q.** So for 23 and a half years?  
 5 **A.** Yes.  
 6 **Q.** If we go to your first witness statement,  
 7 please, WITN08390100 -- it'll come up on the  
 8 screen for you, thank you -- go to page 2 and  
 9 look under the heading "Background" at  
 10 paragraph 5. Under the heading "Background" you  
 11 tell us:  
 12 "I have an MSC in Security & Risk Management  
 13 focusing on preventative security and  
 14 criminology. I also have other supporting  
 15 industry qualifications such as a Diploma in  
 16 Anti-Money Laundering."  
 17 Is that right?  
 18 **A.** Yes.  
 19 **Q.** I think it's also right that you are a former  
 20 police officer?  
 21 **A.** Yes.  
 22 **Q.** Can you tell us how long you served in the  
 23 police service for?  
 24 **A.** About seven years.  
 25 **Q.** Between what years was that?

5

1 **A.** At that time, I can't recall, to be honest.  
 2 **Q.** You tell us in this statement here your  
 3 background and you tell us about your MSC in  
 4 security and risk management. You don't mention  
 5 here that you were a police officer. Was there  
 6 any reason for that?  
 7 **A.** No, not really. It's -- we got a significant  
 8 amount of documentation and pages with a very  
 9 limited time in which to respond to lots of  
 10 questions, so it was a challenge just to get the  
 11 statement in, to be honest.  
 12 **Q.** Did the documents that we sent you assist you to  
 13 remember whether or not you were a police  
 14 officer?  
 15 **A.** I knew I was a police officer.  
 16 **Q.** So I am asking you: in your background here you  
 17 tell us about your MSc, you don't tell us about  
 18 you being a police officer?  
 19 **A.** My MSc was done during the Post Office period.  
 20 They sponsored it and it's around the  
 21 preventative which was the strategy that I was  
 22 taking within the Post Office.  
 23 **Q.** You knew that in the questions we were asking  
 24 you to create the witness statement you were  
 25 being asked questions about adherence to the law

7

1 **A.** 1984 to 1992.  
 2 **Q.** '84 to '92?  
 3 **A.** Yes.  
 4 **Q.** Thank you very much. Were you a uniformed  
 5 officer or a detective?  
 6 **A.** The vast majority uniform. A very small part as  
 7 a detective, for about three months.  
 8 **Q.** What rank were you when you left?  
 9 **A.** Sergeant.  
 10 **Q.** Were you trained in and did you operate under  
 11 the Police and Criminal Evidence Act 1984?  
 12 **A.** Yes.  
 13 **Q.** Did you construct files for advice to be given  
 14 on charging decisions?  
 15 **A.** I submitted files to the CPS, yes.  
 16 **Q.** I'm sorry?  
 17 **A.** I submitted files to the CPS.  
 18 **Q.** Yes, so you put files up to the CPS to make  
 19 charging decisions; is that right?  
 20 **A.** Yes.  
 21 **Q.** Did you ever make decisions about charging  
 22 suspects with offences yourself?  
 23 **A.** Not that I recall, no.  
 24 **Q.** Were you familiar with the terms of and  
 25 operation of the Code for Crown Prosecutors?

6

1 concerning the conduct of criminal  
 2 investigations and prosecutions, didn't you?  
 3 **A.** Um --  
 4 **Q.** That's what the request was all about?  
 5 **A.** Okay, understand.  
 6 **Q.** Did you not think it was relevant to say that  
 7 you were a police officer?  
 8 **A.** As I say, it was a challenging time to get the  
 9 statement in and read all the documents.  
 10 **Q.** So it was the volume of documents that meant  
 11 that you didn't include the fact that you were  
 12 a police officer?  
 13 **A.** I have to say, I can't recall at that time  
 14 trying to get the statement in, to be honest, in  
 15 a challenging time.  
 16 **Q.** You held various roles in the Security team in  
 17 the Post Office, between joining in 1997 and  
 18 2004; is that right?  
 19 **A.** Yes.  
 20 **Q.** From 1999 to 2004 you were Head of Security for  
 21 Royal Mail International; is that right?  
 22 **A.** Yes.  
 23 **Q.** What were the primary responsibilities of that  
 24 job?  
 25 **A.** It was all preventative around the theft or loss

8

1 of international mail.

2 **Q.** Were you aware, in that period of time, of the  
3 development of the Horizon System?

4 **A.** No.

5 **Q.** So in the five-year period between 1999 and  
6 2004, you had not heard of Horizon; is that  
7 right?

8 **A.** As far as I recall, no.

9 **Q.** So you weren't aware that the Benefits Agency  
10 had been involved in the project and had  
11 withdrawn from it?

12 **A.** No.

13 **Q.** You weren't aware of any what were described as  
14 acceptance issues, ie in high level summary,  
15 whether the Horizon System was performing as  
16 expected or not during the development of  
17 Horizon?

18 **A.** No.

19 **Q.** You weren't aware of issues that arose  
20 concerning the reliability and accuracy of the  
21 data that Horizon produced during the rollout of  
22 Horizon?

23 **A.** No.

24 **Q.** You wouldn't have been aware that the rollout of  
25 Horizon had to be paused --

9

1 **A.** To do that, it would have probably been a one  
2 day's training course to sell those basic  
3 products.

4 **Q.** A one-day training course once, not each year?

5 **A.** Once.

6 **Q.** Did you receive any refresher training?

7 **A.** Not that I recall.

8 **Q.** In that period up until 2007, ie until you  
9 became Head of Security, had you heard of any  
10 issues with the integrity of Horizon or the  
11 reliability and accuracy of the data that it  
12 produced?

13 **A.** No.

14 **Q.** From 2007 onwards, you became Head of Security;  
15 is that right?

16 **A.** Yes.

17 **Q.** You took over from Tony Marsh --

18 **A.** Yes.

19 **Q.** -- and Mr Marsh moved to be in charge of  
20 security at the Royal Mail Group; is that right?

21 **A.** Yes.

22 **Q.** You hesitated.

23 **A.** No, he did go to the Royal Mail Group, as Head  
24 of Security, and then it evolved a little bit  
25 after that, I think.

11

1 **A.** No.

2 **Q.** -- nor the reasons why rollout had to be paused?

3 **A.** No.

4 **Q.** From 2004 to 2007, you were the Senior Security  
5 Manager for physical security; is that right?

6 **A.** For the Post Office, yes.

7 **Q.** Were you required to perform task in that role  
8 that required an understanding of how Horizon  
9 functioned in branches?

10 **A.** Very limited for Christmas duty.

11 **Q.** Can you explain, please?

12 **A.** So all employees would support the branch  
13 network at Crown Offices and would go onto the  
14 counter and do the very most basic of services,  
15 like selling stamps.

16 **Q.** So it was just a knowledge sufficient to work at  
17 a temporary cover level at Christmas?

18 **A.** Even more limited than that, because it is very  
19 basic products we would have been selling.

20 **Q.** Sorry, if you just keep your voice up. It was  
21 very basic products?

22 **A.** Such as selling stamps. It wasn't even extended  
23 past those sort of areas. Very basic products.

24 **Q.** Between 2004 and 2007, did you receive any  
25 training on the use of Horizon?

10

1 **Q.** Tell us about the evolution?

2 **A.** The Security Director or Group Security Director  
3 left around about 2008 and he took on that role,  
4 as well as the director of -- his existing role  
5 so it merged two roles.

6 **Q.** So he didn't move to Royal Mail Group to be the  
7 Head of Security; he moved for another role and  
8 then a year later also took over that role?

9 **A.** No, he did go over to be the Head of security or  
10 Director of Security for Royal Mail Letters and  
11 then when the Royal Mail Group Director left he  
12 took on that role as well as the Royal Mail  
13 Letters role.

14 **Q.** Was there any chain of responsibility between  
15 you and Mr Marsh, after Mr Marsh moved to the  
16 Royal Mail Group?

17 **A.** Once he took over the Group Security Director,  
18 yes, there was dotted line.

19 **Q.** What did the dotted line consist of?

20 **A.** He was the Group Security Director responsible  
21 for security across all business units within  
22 the Royal Mail Group.

23 **Q.** So, for example, how often would you meet or  
24 otherwise communicate?

25 **A.** I do recall going and meeting him two or three

12

1 times in the first 18 months or couple of years,  
 2 and less so thereafter.

3 **Q.** If you can tell us more about what a "dotted  
 4 line" means. Was he responsible in any way for  
 5 your management or supervision?

6 **A.** Day to day, that's the responsibility of Post  
 7 Office line management. He was responsible more  
 8 for the security and -- yeah, the security  
 9 requirements across the business.

10 **Q.** What does that mean, "He was responsible for the  
 11 security requirements across the business",  
 12 insofar as that concerned you?

13 **A.** So he had overall oversight of the security  
 14 within the Post Office, the strategy, the  
 15 direction, what we're delivering to, our  
 16 performance, et cetera.

17 **Q.** So would you say he had oversight of the  
 18 discharge of the responsibilities of the  
 19 Security Department within Post Office,  
 20 including its leadership by you?

21 **A.** I guess so, yes.

22 **Q.** We've heard from Mr Marsh -- it's the transcript  
 23 for 5 July 2023, page 213, line 30 and on to  
 24 page 214 -- that he did not enjoy a good working  
 25 relationship between you. He said it wasn't

13

1 where we were getting our largest losses or we  
 2 were repeating the same type of investigations  
 3 and prosecutions, and I wanted to do it more  
 4 preventative, stop it at the outset, whether  
 5 it's fraud or non-compliance, rather than just  
 6 keep on investigating and prosecuting.

7 As such, the analysts would then draw up the  
 8 outliers, so we could see our branch profile,  
 9 and it was not within the -- sort of, the  
 10 boundaries of what all the other profiles of  
 11 that Post Office are, it was an outlier, and  
 12 that could be 1 to 50, 1 to 100 post offices  
 13 and, rather than investigating and looking to  
 14 prosecute all those outliers, I took  
 15 a preventative approach.

16 So we did letters out to them, we'd done  
 17 phone calls, we offered training, et cetera.

18 And his was very much he wanted every single  
 19 one investigated and, if necessary or  
 20 appropriate, prosecuted.

21 **Q.** How did he make this clear to you, that he  
 22 wanted everyone investigated and, if  
 23 appropriate, prosecuted?

24 **A.** I can't recall the discussions that we had when  
 25 I went to meet him but, ultimately, he left me

15

1 a great working relationship and it wasn't  
 2 a good working relationship. First, is that  
 3 right?

4 **A.** We had a good working relationship up until  
 5 about a certain point around about 2008 and,  
 6 thereafter, it was a bit more of a distant  
 7 relationship.

8 **Q.** Why was it a bit more of a distant relationship?

9 **A.** There was a complete disagreement in terms of  
 10 strategy around investigation and prosecution.

11 **Q.** Was it a personality issue between the pair of  
 12 you?

13 **A.** No.

14 **Q.** What was the nature of the disagreement, then?

15 **A.** I'd taken over as Head of Security for the Post  
 16 Office. The Investigation team, which I created  
 17 into the Fraud strand, was very much focused on  
 18 purely investigation and prosecution, whereas  
 19 I wanted to take a very much more preventative  
 20 approach, so to deter, to prevent, to disrupt  
 21 and then, if necessary, investigate and  
 22 prosecute.

23 And that approach took an analytical  
 24 approach, where we did a root cause in terms of  
 25 the MI on all the different products. We'd see

14

1 a message to say that, as Group Security  
 2 Director, he was going to take over the  
 3 Investigation team, as from the following week,  
 4 and have it reporting into his Head of Criminal  
 5 Investigations.

6 **Q.** If you didn't do what he said?

7 **A.** No, it was --

8 **Q.** In any event?

9 **A.** He was going to do that in any event.

10 **Q.** Did that happen?

11 **A.** No.

12 **Q.** Why didn't it happen?

13 **A.** I reported it to my line manager --

14 **Q.** Which was who?

15 **A.** I believe it was Mike Young at that time but it  
 16 is only I believe. It could have been Ric  
 17 Francis but I believe it was Mike Young.

18 **Q.** Sorry, I interrupted you. You reported it to  
 19 Mike Young and?

20 **A.** Obviously, I think there was conversations more  
 21 senior, then I was requiring to write a report  
 22 on the reasons and rationale of the strategy.  
 23 I think I got the Head of Fraud to write that.

24 That was submitted to Mike Young and

25 I understand the MD, Alan Cook, had

16

1 conversations with his senior executives in  
 2 Royal Mail Group and then it came back to say  
 3 I can continue with the prevention approach.  
 4 **Q.** So would that be from about 2008 onwards?  
 5 **A.** 2008/2009. I can't actually be precise.  
 6 **Q.** Had you encountered any difficulties with  
 7 Mr Marsh before he moved on to the Royal Mail  
 8 Group?  
 9 **A.** No, he was my line manager for three years  
 10 before that.  
 11 **Q.** Did you enjoy a good working relationship with  
 12 him then?  
 13 **A.** Yes.  
 14 **Q.** In any event, you assumed the role of the Post  
 15 Office's Head of Security in 2007 and you stayed  
 16 in that position until you left the organisation  
 17 in 2016; is that right?  
 18 **A.** Yes.  
 19 **Q.** Therefore, you were accordingly Head of Security  
 20 during one of the heaviest periods of  
 21 subpostmaster prosecutions; you know that now?  
 22 **A.** I accept that.  
 23 **Q.** You presided over the cessation of prosecutions  
 24 from 2014 onwards?  
 25 **A.** I thought it was 2013 but if it's 2014 --

17

1 decisions on prosecution.  
 2 **Q.** You must know, therefore, what was done in order  
 3 to find an expert to speak to the reliability  
 4 and integrity of Horizon, mustn't you?  
 5 **A.** Sorry, can you repeat that?  
 6 **Q.** You must know, therefore, as Head of Security  
 7 with those responsibilities, what was done to  
 8 find an expert witness who could speak to the  
 9 reliability and integrity of Horizon?  
 10 **A.** I was aware that there were enquiries going on.  
 11 I only recall being in one meeting with  
 12 an external potential SME.  
 13 **Q.** Who was the potential external?  
 14 **A.** It was a London university. I don't know which  
 15 one.  
 16 **Q.** Were they prepared to give expert evidence  
 17 standing up the reliability of Horizon?  
 18 **A.** It was an early meeting and, no, I don't think  
 19 it was progressed thereafter.  
 20 **Q.** So the reason for the cessation of prosecutions  
 21 was twofold, is this right, on your  
 22 recollection: firstly, the subject matter expert  
 23 from Fujitsu had been discredited, according to  
 24 advice given by Cartwright King; a new expert  
 25 was needed but none could be found?

19

1 **Q.** The last months of 2013.  
 2 **A.** Yes.  
 3 **Q.** What was the driver for the change of policy?  
 4 **A.** Because the subject matter expertise (*sic*)  
 5 within Fujitsu had been discredited, apparently,  
 6 by the information that he'd been giving, the  
 7 evidence he'd been giving, and Cartwright King  
 8 said he cannot be used and, therefore, the Post  
 9 Office needed to find another subject matter  
 10 expert to support any evidence.  
 11 **Q.** Could you find another subject matter expert to  
 12 support reliance on the Horizon System?  
 13 **A.** By the time I left the Post Office, which is in  
 14 2016, no.  
 15 **Q.** So no expert could be found in three years or so  
 16 to support the reliability of Horizon; is that  
 17 right?  
 18 **A.** No. I wasn't really involved in those  
 19 discussions, so I'm not too sure what was in the  
 20 background but, as far as I'm aware, no.  
 21 **Q.** You were the Head of Security, the department  
 22 responsible for investigating and submitting  
 23 files for prosecution and, in your case, making  
 24 decisions on prosecutions?  
 25 **A.** For a short period of time, yes, I made

18

1 **A.** Correct.  
 2 **Q.** I think you retired in 2016, or you left the  
 3 Post Office in 2016, the year the Group  
 4 Litigation was launched and a claim was issued.  
 5 Did you know about that before you left?  
 6 **A.** Not that I recall, no.  
 7 **Q.** Did you retire then or did you move on to  
 8 another job?  
 9 **A.** Moved on.  
 10 **Q.** Was there any relationship between the  
 11 commencement of the Group Litigation in 2016  
 12 concerning the Horizon System and the data that  
 13 it produced being used for prosecutions and you  
 14 leaving the Post Office?  
 15 **A.** No.  
 16 **Q.** They were entirely unconnected events?  
 17 **A.** Yes.  
 18 **Q.** Can I turn to start asking you about the  
 19 substance of issues by looking at an issue which  
 20 arises towards the end of the era of private  
 21 prosecutions, so it's therefore out of turn in  
 22 the chronology. I want to start with it to work  
 23 out whether it tells us anything about the  
 24 values of the investigation and prosecution  
 25 functions of the Post Office more generally in

20

1 the earlier period. The topic is the recording  
2 of information and the disclosure of material in  
3 criminal proceedings. Okay?

4 I'm going to deal with matters  
5 chronologically within this topic to give you  
6 some context. We're in the year 2013, which,  
7 right at the end of which, the prosecution  
8 function, as we've discussed, came to an end,  
9 okay?

10 Can we start by looking at something which  
11 happen on the 3 July 2013. Do you remember  
12 a man called Simon Clarke?

13 **A.** Yes.

14 **Q.** What do you recall about him?

15 **A.** He was a lawyer with Cartwright King.

16 **Q.** So he was an in-house barrister, do you  
17 remember, at the solicitors firm Cartwright  
18 King?

19 **A.** When you say "in-house", for us, he was  
20 an external lawyer.

21 **Q.** Yes, he was a barrister in Cartwright King or  
22 did you just know him as a lawyer?

23 **A.** A lawyer.

24 **Q.** Okay. Did you enjoy a working relationship with  
25 him?

21

1 which is dated 2 August.

2 Can we look at that first, please. It's  
3 POL00006799. So this is an advice dated  
4 2 August 2013 -- take it from me rather than  
5 looking at the end of the document -- and can we  
6 just read paragraphs 1 and 2 together. He says:

7 "On 3 July 2013 I attended [the Post Office]  
8 in conference at [Post Office] Head Office to  
9 consider issues relating to the Horizon computer  
10 system and the prosecution of criminal offences  
11 committed against [Post Office] by  
12 subpostmasters and clerks.

13 "One of the topics considered by the  
14 conference was that of disclosure: I advised  
15 that there ought to be a single, central hub,  
16 the function of which was to act as the primary  
17 repository for all Horizon-related issues. The  
18 hub would collate, from all sources into one  
19 location, all Horizon-related defects, bugs,  
20 complaints, queries and Fujitsu remedies,  
21 thereby providing a future expert witness, and  
22 those charged with disclosure duties, with  
23 recourse to a single information point [where]  
24 all Horizon issues could be identified and  
25 considered. The rationale behind this advice

23

1 **A.** I don't recall actually having a working  
2 relationship with him. I may have met him once  
3 or twice but there wasn't a working  
4 relationship. There was nothing --

5 **Q.** Cartwright King were the firm of choice for the  
6 conduct of private prosecutions, is that right,  
7 for the Post Office?

8 **A.** Yes.

9 **Q.** Was that for the entirety of the period up until  
10 now when you were the Head of Security, so from  
11 2007 to 2013?

12 **A.** I only recall them around about separation,  
13 either at separation or just prior to  
14 separation.

15 **Q.** Ie from 2011 onwards; is that right?

16 **A.** Well, separation was 2012, so it was either just  
17 before that or around that time.

18 **Q.** In any event, on 3 July 2013, Mr Clarke attended  
19 a conference at Post Office Headquarters to  
20 consider issues relating to the reliability of  
21 the Horizon System and the prosecution of  
22 subpostmasters for criminal offences. There's  
23 no note that we have of this meeting of 3 July  
24 2013 but the advice that he gave at that meeting  
25 is addressed in a later advice that he wrote,

22

1 derived from the need to protect [the Post  
2 Office] from the current situation repeating  
3 itself in future."

4 Did you attend that conference, the 3 July  
5 2013 conference?

6 **A.** I don't recall attending.

7 **Q.** That answer, "I don't recall", is capable of  
8 a wide range of possibilities, including "It's  
9 very likely that I did attend but I've got no  
10 present recollection, it being 10 years on, that  
11 I did", right down to, "I don't think that did.  
12 If I had attended I would remember it, albeit  
13 I've got no present recollection".

14 **A.** The latter.

15 **Q.** Where in the spectrum are we?

16 **A.** The latter.

17 **Q.** You don't think that you did?

18 **A.** Correct.

19 **Q.** Do you recognise what is said there, the need to  
20 create a single, central hub to collate from  
21 a range of sources information about defects,  
22 bugs, complaints, queries and remedies?

23 **A.** Yes.

24 **Q.** So, one way or another, you were told about the  
25 need to create this hub; is that right?

24

- 1 A. I was told, I'm not necessarily saying I was,  
2 perhaps, fully briefed in terms of its  
3 requirements.
- 4 Q. You said you were told but not necessarily fully  
5 briefed?
- 6 A. I don't recall getting a real briefing in terms  
7 of the requirements of setting up the weekly  
8 meetings.
- 9 Q. Moving on to paragraph 3, he says:  
10 "[The Post Office] accepted that advice and  
11 [accordingly] a weekly conference-call meeting  
12 was established so as to meet the requirement of  
13 the central hub. Participants were informed  
14 that they should bring all Horizon-related  
15 issues that they had encountered to the meeting;  
16 minutes were to be taken, centrally retained and  
17 disseminated to those who required the  
18 information, this list to include [Post  
19 Office's] Horizon expert witness."  
20 Is the first part of that paragraph correct,  
21 going back to the bottom of page 1:  
22 "[Accordingly] a weekly conference call  
23 meeting was established so as to meet the  
24 requirement of the central hub."  
25 A. Yes.

25

- 1 "This document considers the provision and  
2 use of such evidence in past prosecutions and  
3 those currently under way. [He] will deal with  
4 future prosecutions separately."  
5 Did you receive a copy of this advice?
- 6 A. I don't believe I did.
- 7 Q. Were you told about the contents of it?
- 8 A. I don't believe I did.
- 9 Q. Can we look, please, at page 13, paragraph 38  
10 and following. I'm not going to go through the  
11 entirety of the advice but just go to  
12 Mr Clarke's conclusions. I'm going to replace  
13 where Mr Clarke says "Doctor" or uses the word  
14 "Jennings" with "Mr Jenkins":  
15 "The reasons as to why [Mr Jenkins] failed  
16 to comply with his duty are beyond the scope of  
17 this review. The effects of that failure  
18 however must be considered. I advise the  
19 following to be the position:  
20 "[Mr Jenkins] failed to disclose material  
21 known to him but which undermines his expert  
22 opinion. This failure is in plain breach of his  
23 duty as an expert witness.  
24 "Accordingly [Mr Jenkins] credibility as  
25 an expert witness is fatally undermined; he

27

- 1 Q. Can we go on to paragraph 4:  
2 "Three such conference calls were convened,  
3 each conducted on a Wednesday morning.  
4 A representative from Cartwright King solicitors  
5 'attended' each meeting. A minute-taker was  
6 appointed for each call and I understand that  
7 each of the minute-takers retain their own  
8 handwritten minutes."  
9 We'll come back to all of that in a moment.  
10 Can we move forward, please, to 15 July. That's  
11 POL00006357. If we go to the last page, please,  
12 which is page 14, and scroll down, please,  
13 you'll see that it's dated 15 July 2013. This  
14 is known as the first Clarke Advice, yes?  
15 If we go back to the first page, please, and  
16 look at the first paragraph, Mr Clarke says:  
17 "I am asked to advise [the Post Office] on  
18 the use of expert evidence in support of  
19 prosecutions of allegedly criminal conduct  
20 committed by those involved in the delivery of  
21 Post Office services to the public through sub  
22 post office branches. By and large these  
23 allegations relate to misconduct said to have  
24 been committed by [subpostmasters] and/or their  
25 clerks.

26

- 1 should not be asked to provide expert evidence  
2 in any current or future prosecution.  
3 "Similarly, in those current and ongoing  
4 cases where [Mr Jenkins] has provided an expert  
5 witness statement, he should not be called upon  
6 to give that evidence. Rather, we should seek  
7 a different independent expert to fulfil that  
8 role.  
9 "Notwithstanding that the failure is that of  
10 [Mr Jenkins] and, arguably, of Fujitsu Services  
11 Limited, being his employer, this failure has  
12 a profound effect upon [Post Office] and [Post  
13 Office] prosecutions, not least by reason of  
14 [Mr Jenkins]' failure, material which should  
15 have been disclosed to defendants was not  
16 disclosed, thereby placing [the Post Office] in  
17 breach of their duty as a prosecutor.  
18 "By reason of that failure to disclose,  
19 there are now number of convicted defendants to  
20 whom the existence of bugs should have been  
21 disclosed but was not. Those defendants remain  
22 entitled to have disclosure of that material  
23 notwithstanding their now convict status.  
24 (I have already advised on the need to conduct  
25 a review of all [Post Office] prosecutions so as

28

1 to identify those who ought to have had the  
2 material disclosed to them. That review is  
3 presently under way).

4 "Further, there are a number of current  
5 cases where there has been no disclosure where  
6 there ought to have been. Here we must disclose  
7 the existence of the bugs to those defendants  
8 where the test for disclosure is met.

9 "Where a convicted defendant or his lawyers  
10 consider that the failure to disclose the  
11 material reveals an arguable ground of appeal,  
12 he may seek the leave of the Court of Appeal to  
13 challenge his conviction.

14 "In an appropriate case the Court of Appeal  
15 will consider whether or not any conviction is  
16 unsafe. In doing so, they may well enquire into  
17 the reasons for [Mr Jenkins'] failure to refer  
18 to the existence of bugs in his expert witness  
19 statements and evidence."

20 Out of that, how much were you told?

21 **A.** I don't recall being told that.

22 **Q.** You were told none of this?

23 **A.** I don't recall seeing this document.

24 **Q.** That's a different question to whether you saw  
25 the document, but you've already said that you

29

1 number of prosecutions for which my department  
2 is responsible"?

3 **A.** So I do recall the solicitors discussing, in  
4 terms of reviewing the cases, and I believe they  
5 reviewed the cases going back a number of years.

6 **Q.** Did you ask to see the advice?

7 **A.** I don't believe I knew the advice was there.

8 **Q.** So you're the Head of Security responsible for  
9 nearly a decade for the prosecution of  
10 subpostmasters, your department carries out  
11 those functions and you neither saw this  
12 document nor had its contents explained to you;  
13 is that right?

14 **A.** That's what I believe, yes.

15 **Q.** Whose responsible would it be to show you this  
16 document?

17 **A.** That would have been my line manager, Susan  
18 Crichton.

19 **Q.** Do you agree, looking at it now, that you should  
20 have been shown it?

21 **A.** Yes.

22 **Q.** Why do you think you should have been shown it?

23 **A.** Because, obviously, my team was responsible for  
24 investigations and submitting case files to the  
25 lawyers.

31

1 don't recall being -- seen it (*sic*), to how much  
2 of what is written there you were told?

3 **A.** The only thing I remember being told was that he  
4 couldn't have been used because he's no longer  
5 a -- he's a discredited witness.

6 **Q.** You were told the bit about Mr Jenkins being  
7 a discredited witness. Were you told the bit,  
8 and I'm summarising, about that fact calling  
9 into question the safety of past convictions?

10 **A.** I don't recall that.

11 **Q.** Who told you that Mr Jenkins was a discredited  
12 witness?

13 **A.** I suspect that would have been my line manager,  
14 Susan Crichton.

15 **Q.** Susan Crichton?

16 **A.** Mm-hm.

17 **Q.** Did she mention it in a meeting or in passing?

18 **A.** I can't recall, I think it was probably more  
19 than once it was discussed.

20 **Q.** Did you say "Why? What's Mr Jenkins done  
21 wrong?"

22 **A.** I suspect I did ask. I can't particularly  
23 recall.

24 **Q.** Did you think "Well, hold on, if he's  
25 a discredited witness, he's given evidence in a

30

1 **Q.** And you yourself had made a number of decisions  
2 to prosecute?

3 **A.** Yes.

4 **Q.** That can come down, thank you.

5 The next step is 19 July 2013 and you'll  
6 recall that in the second Clarke advice, the one  
7 that we looked at first, Mr Clarke had advised  
8 the setting up of a single central hub, that the  
9 Post Office had accepted that advice and,  
10 accordingly, a weekly conference call was  
11 established, and you've agreed that that is  
12 accurate?

13 **A.** Yes.

14 **Q.** Now, the first hub meeting was on 19 July 2013.  
15 Can we look at that, please, POL00083932. Can  
16 you see this is a note of what's described as  
17 a "Regular Call re Horizon Issues" on 19 July  
18 2013.

19 **A.** Yes.

20 **Q.** Now, I don't think you're listed as being in  
21 attendance; is that right?

22 **A.** Yes.

23 **Q.** Can you see under "Security", Dave Posnett and  
24 Rob King are listed as being in attendance?

25 I think this was a telephone call, rather than

32



1 an in-person call; is that right?  
 2 **A.** I can see their names. I don't know whether  
 3 it's telephone call or in person.  
 4 **Q.** Can you tell us at this time, so July '13, the  
 5 function that Rob King performed?  
 6 **A.** He was the Senior Security Manager or otherwise  
 7 Head of Security Operations, which covered the  
 8 fraud and prosecutions.  
 9 **Q.** So was he a deputy to you?  
 10 **A.** No, the way that I structured the department was  
 11 that there were five strands, each with their  
 12 own security discipline, and he was the head of  
 13 the -- what was originally the Fraud strand but  
 14 merged with another to become the Security  
 15 Operations. So I had five direct reports, all  
 16 head of their own respective security  
 17 disciplines.  
 18 **Q.** Did he report to you?  
 19 **A.** Yes.  
 20 **Q.** So you were his line manager?  
 21 **A.** Yes.  
 22 **Q.** Looking back now, do you think you sent him  
 23 along as, essentially, your deputy for this  
 24 meeting?  
 25 **A.** Deputy, um, I think I'd asked him to actually

33

1 taking notes. In scope were issues and problems  
 2 the group were made aware of."  
 3 As to the line, "No minutes circulated but  
 4 we will be taking notes", said by or attributed  
 5 to Rob King, had you given any instruction or  
 6 direction that no minutes of the meeting were to  
 7 be circulated?  
 8 **A.** So, looking at the documentation that's been  
 9 sent to me, the email exchange between myself  
 10 and Susan Crichton --  
 11 **Q.** That's on 13 and 14 August?  
 12 **A.** -- yes --  
 13 **Q.** We're going to come to that in a moment, yes.  
 14 **A.** -- and, therefore, based on that document, I was  
 15 given a brief by Susan Crichton, which appears,  
 16 therefore, to have fed down into Rob King  
 17 through me.  
 18 **Q.** So the answer is yes, you did say that minutes  
 19 would not be circulated but that's because Susan  
 20 Crichton told you that that was what was to  
 21 happen?  
 22 **A.** Yes.  
 23 **Q.** Is that right?  
 24 **A.** Yes.  
 25 **Q.** Were you merely the conduit for Susan Crichton's

35

1 take a lead rather than deputise for me.  
 2 **Q.** So you asked him to conduct the meeting --  
 3 **A.** Mm-hm.  
 4 **Q.** -- is that right?  
 5 **A.** I believe so, from looking at the documentation.  
 6 **Q.** You tell us in your new witness statement, the  
 7 one you filed yesterday, that you think you  
 8 delegated the task to Rob King of chairing the  
 9 meeting; is that right?  
 10 **A.** Yes.  
 11 **Q.** If we scroll through the minute, please, stop  
 12 there:  
 13 "Outlined the purpose of the meeting; to  
 14 identify any issues around the integrity of  
 15 Horizon from a technical prospective and take  
 16 any necessary action."  
 17 Does that describe, as you understand it,  
 18 the function or purpose of the meeting?  
 19 **A.** Yes.  
 20 **Q.** It says:  
 21 "A process needs to be set up within each  
 22 directorate where each representative  
 23 proactively seeks out any technically with  
 24 Horizon.  
 25 "No minutes circulated, but we will be

34

1 orders then?  
 2 **A.** Yes.  
 3 **Q.** You were just following orders?  
 4 **A.** Looking at the document, that's how I received  
 5 the brief and that's how I briefed Rob King.  
 6 **Q.** Then the part of the sentence "but we will be  
 7 taking notes", ie Security will be taking notes;  
 8 is that how you would understand it?  
 9 **A.** Yes.  
 10 **Q.** Was that part of the order that you passed on:  
 11 that it would be the Security Department that  
 12 would be taking notes?  
 13 **A.** Yes, looking at the email exchange, it was clear  
 14 that I wanted notes taken.  
 15 **Q.** If we carry on scrolling through the document,  
 16 please, and then stop there. Under "Martin  
 17 Smith", do you remember who Martin Smith was?  
 18 **A.** Yes.  
 19 **Q.** Who was Martin Smith?  
 20 **A.** A lawyer at Cartwright King.  
 21 **Q.** So he was a solicitor at Cartwright King, yes?  
 22 He, in the second part of the note that's  
 23 attributed to him says:  
 24 "Clarification on disclosure and email  
 25 correspondence."

36

1 Then in a sentence that is difficult,  
 2 perhaps, to decipher:  
 3 "Emphasised need to ensure that any document  
 4 produced would be potentially disclosable."  
 5 Do you remember giving any instructions  
 6 along those lines?  
 7 **A.** I don't recall.  
 8 **Q.** Would you understand this to mean that this is  
 9 simply recording the fact that, if a document is  
 10 produced, it needs to be retained so that it can  
 11 be disclosed?  
 12 **A.** Yes.  
 13 **Q.** There's nothing wrong with that?  
 14 **A.** Doesn't look wrong. Doesn't say what if you  
 15 don't write it down but doesn't look wrong.  
 16 **Q.** Yes. It's saying, if any document is produced,  
 17 one reading of it is there is a need to ensure  
 18 that it is retained so that it's disclosable?  
 19 **A.** Mm-hm.  
 20 **Q.** Mr Posnett makes a contribution and Andrew  
 21 Parsons then speaks. Who was Andrew Parsons?  
 22 **A.** A lawyer with Bond Dickinson.  
 23 **Q.** Did you, at this time, have any dealings with  
 24 Bond Dickinson?  
 25 **A.** I don't recall particularly at that time but

37

1 **A.** Because everything would need to be disclosable.  
 2 **Q.** Was it fed back to you that Mr Parsons had given  
 3 this advice at this meeting?  
 4 **A.** I don't recall.  
 5 **Q.** Can we move forwards, please, to 24 July, the  
 6 next meeting, the second hub meeting. The  
 7 reference for that is POL00083933. Thank you.  
 8 So we can see similar format, "Regular Call re  
 9 Horizon Issues", meeting on 24 July, and we can  
 10 see that you're not recorded as being present  
 11 but, from Security, there's Mr King again and  
 12 Andrew Wise. Who was Andrew Wise?  
 13 **A.** A Security Manager within the Security  
 14 Operations team, Investigator.  
 15 **Q.** Again, we can see that Mr King starts the  
 16 meeting off and, again, was it your  
 17 understanding that he was essentially chairing  
 18 the meeting?  
 19 **A.** Yes.  
 20 **Q.** Was he reporting back to you what was happening  
 21 at each meeting?  
 22 **A.** From the email exchange with Susan Crichton, it  
 23 says he was being -- I was being debriefed.  
 24 **Q.** You were being briefed about it?  
 25 **A.** Yes.

39

1 there may have been engagement at some point  
 2 over the years. There was a couple of occasions  
 3 where I dealt with Bond Dickinson but very  
 4 rarely.  
 5 **Q.** Anyway, the solicitor from Bond Dickinson says  
 6 there was a:  
 7 "... need to limit public debate on the  
 8 Horizon issue, as this [might] have detrimental  
 9 impact on future litigation."  
 10 Then if we scroll on, please, and keep  
 11 going. Then if we go to Mr Parsons again,  
 12 Mr Parsons is recorded as saying, in the second  
 13 part of this paragraph, that he:  
 14 "Spoke about emails, written  
 15 [communications], etc ... if it's produced it's  
 16 then available for disclosure, if it's not then  
 17 technically it isn't."  
 18 What do you understand that to mean?  
 19 **A.** The way that it's written there, that if  
 20 something is written down, it's definitely  
 21 disclosable, but if something is not, then, as  
 22 he says, technically it isn't.  
 23 **Q.** Is that a view to which you would subscribe?  
 24 **A.** No.  
 25 **Q.** Why not?

38

1 **Q.** Again, in the second paragraph there, Mr King is  
 2 recorded saying:  
 3 "No minutes circulated, but we will be  
 4 taking notes. In scope were issues and problems  
 5 the group were made aware of."  
 6 So that's materially the same as the warning  
 7 given at the beginning of the first meeting,  
 8 yes?  
 9 **A.** Yes.  
 10 **Q.** Again, does that reflect the instruction that  
 11 you gave to Mr King, passing on what Susan  
 12 Crichton had told you to tell the meeting?  
 13 **A.** Yes.  
 14 **Q.** Can we move forward to 31 July, please.  
 15 POL00139732. So this is the date of the third  
 16 hub meeting on 31 July 2013. We can see that,  
 17 again, you're not recorded as being present or  
 18 joining the call. It's Mr King and Mr Posnett  
 19 representing the Security Department, and  
 20 Mr Posnett is opening the meeting. Does that  
 21 mean, by this time, Mr Posnett had been put in  
 22 charge of chairing the meeting?  
 23 **A.** No, it would be Rob King.  
 24 **Q.** He remained the chair or the leader of the  
 25 meeting, is that right, to your knowledge?

40

1 A. Until mid-August.  
 2 Q. When you took over?  
 3 A. Yes.  
 4 Q. Again, you're not in attendance. I don't think  
 5 there's the warning at the beginning there.  
 6 Can we move forwards, please, to 31 July  
 7 2013, that's POL00139745. This is an attendance  
 8 note dated 1 August 2013, written, we understand  
 9 it, by Martin Smith, whose name is in the top  
 10 right-hand corner -- can you see that --  
 11 A. Yes.  
 12 Q. -- in relation to a call that he had with you  
 13 the day before, 31 July 2013? Can you see under  
 14 "Detail", it says "TC", which may be telephone  
 15 call, "JS", which I presume is you at 6 pm on  
 16 31 July 2013:  
 17 "... Discussing disclosure issues: JScott  
 18 has instructed that typed minutes be scrapped."  
 19 First off, is that a call with you or is  
 20 that a call with Jamail Singh?  
 21 A. I don't recall but my belief would be it wasn't  
 22 with me.  
 23 Q. Why is it your belief that it was not with you?  
 24 A. Because I don't recall having a relationship  
 25 like that with Cartwright King at that stage,

41

1 Q. You said in that sentence "whatever clunky words  
 2 you use", why would you assume that you spoke in  
 3 a clunky way, rather than in a clear way?  
 4 A. I've no idea. But I would not go around asking  
 5 for things to be destroyed or deleted. That's  
 6 just not me.  
 7 Q. We've seen that in the typewritten minutes of  
 8 the meeting there was an instruction that  
 9 minutes were not to be circulated, but that the  
 10 Security Department were going to keep their own  
 11 notes. That was the instruction that you had  
 12 given, passing it on from Susan Crichton, yes?  
 13 A. Yes.  
 14 Q. So if typewritten minutes were, in fact, being  
 15 kept as we've seen they were, that would be  
 16 contrary to the instruction that you had given,  
 17 wouldn't it?  
 18 A. Sorry, say that one again?  
 19 Q. Yes. You told us, and it's reflected in two of  
 20 the first three sets of the minutes, that the  
 21 instruction that you passed on from Susan  
 22 Crichton was that minutes were not going to be  
 23 circulated but that the Security Department were  
 24 going to keep their own notes?  
 25 A. Correct.

43

1 because it was very early on, but it's not to  
 2 say I didn't have the call with them. But  
 3 I don't believe that it would have been me.  
 4 Q. You'll see that the way that Mr Smith wrote his  
 5 attendance note is one person is referred to as  
 6 "JS", can you see that in both the summary and  
 7 in the detail?  
 8 A. Yes.  
 9 Q. And the other person is referred to as "JScott"?  
 10 A. Yes.  
 11 Q. Let's assume, for the moment, that this is  
 12 Mr Smith speaking to Jarnail Singh, at 6.00 pm  
 13 on 31 July 2013, and was telling Mr Smith that  
 14 you, "JScott", had instructed typed minutes to  
 15 be scrapped. Did you give an instruction that  
 16 typed minutes would be scrapped?  
 17 A. I do not recall what I said or how I said it or  
 18 in what clunky -- way.  
 19 Q. Did you say "in what clunky way"?  
 20 A. Yeah, or how it was interpreted. But I don't  
 21 recall asking for any minutes to be scrapped.  
 22 "Scrapped" is not a word I would have  
 23 particularly used to destroy or delete minutes.  
 24 "Scrapped" is more like a process, ie scrap  
 25 a process going forward.

42

1 Q. We've seen that typewritten minutes were, in  
 2 fact, being kept. We've just looked at three  
 3 lots of them, haven't we?  
 4 A. Correct.  
 5 Q. That would be contrary to the instruction that  
 6 you gave, wouldn't it?  
 7 A. I'm a bit lost on the point.  
 8 Q. If the Security Department were going to keep  
 9 their own notes --  
 10 A. Yes.  
 11 Q. -- and somebody else had, in fact, been keeping  
 12 a typewritten version of what had happened at  
 13 the meeting, ie the three documents we've just  
 14 looked at --  
 15 A. Mm-hm.  
 16 Q. -- that would be contrary to the instruction you  
 17 had given, wouldn't it?  
 18 A. Yes, in principle, yes.  
 19 Q. Therefore, if it was contrary to the instruction  
 20 you had given, you would want it to be stopped,  
 21 wouldn't you?  
 22 A. Once they are there, they're there. I might  
 23 have wanted, in the future, the process to be  
 24 stopped -- in the future -- but once the notes  
 25 are there, they're there. And if you refer back

44

1 to my email exchange, I was very clear in terms  
 2 of that notes had been retained -- had been made  
 3 and had been retained and were available.  
 4 **Q.** So you would want typewritten notes not to be  
 5 kept in the future because that was contrary to  
 6 the instruction that you had given passing it on  
 7 for Susan Crichton; is that right?  
 8 **A.** In principle, that may have been the case,  
 9 looking at the documentation.  
 10 **Q.** That would be consistent with you telling  
 11 Mr Singh to scrap typed minutes, wouldn't it,  
 12 ie what's written here?  
 13 **A.** I don't recall a conversation with Mr Singh.  
 14 I don't recall anything of that nature. I would  
 15 not -- I would not go around asking for things  
 16 to be destroyed or deleted.  
 17 **Q.** I'm not asking you at the moment about the  
 18 destruction of anything. I'm asking you about  
 19 the cessation, the stopping, the scrapping, of  
 20 the creation of typewritten notes?  
 21 **A.** That I can't recall.  
 22 **Q.** Well, it would be consistent with the  
 23 instruction that you had given, wouldn't it?  
 24 **A.** Yes.  
 25 **Q.** "Let's not keep typewritten notes" --  
 45

1 Jarnail Singh at 9.00 in the morning to Martin  
 2 Smith, copied to Rodric Williams. Who was  
 3 Rodric Williams?  
 4 **A.** Post Office lawyer.  
 5 **Q.** "Martin  
 6 "I know Simon [I think that must be  
 7 Mr Clarke] is advising on disclosure. As  
 8 discussed can he look into the common myth that  
 9 emails, written communications, etc, meetings.  
 10 If it's produced then it's available for  
 11 disclosure. If it's not then technically it  
 12 isn't. Possible [which may mean 'possibly']  
 13 true of civil cases NOT CRIMINAL CASES?"  
 14 "Thanks.  
 15 "Jarnail Singh."  
 16 So would you understand this to be Mr Singh  
 17 asking Cartwright King and, in particular  
 18 Mr Clarke to advise on what's described as  
 19 a common myth, that information not reduced to  
 20 writing need not be disclosed?  
 21 **A.** Yes.  
 22 **Q.** Was that a myth that you had heard percolating  
 23 within the Security Department of the Post  
 24 Office?  
 25 **A.** I can't be explicit but I seem to recall there  
 47

1 **A.** Yes.  
 2 **Q.** -- to be circulated amongst the wider  
 3 readership?  
 4 **A.** Mm-hm.  
 5 **Q.** Is that fair?  
 6 **A.** Yes.  
 7 **Q.** Instead, notes should be kept by the Security  
 8 Department alone?  
 9 **A.** I imagine other people would have written their  
 10 own notes.  
 11 **Q.** Was that permitted or forbidden, according to  
 12 the direction that you passed on from Susan  
 13 Crichton?  
 14 **A.** No, it would be permitted.  
 15 **Q.** So what was forbidden, then?  
 16 **A.** I can only go by the email exchange with Susan  
 17 Crichton is to reduce the circulation of  
 18 minutes.  
 19 **Q.** What explanation did she give for the need to  
 20 reduce the circulation of minutes?  
 21 **A.** Reduce the risk of being widely circulated and  
 22 then being subject to Freedom of Information or  
 23 disclosure, as per my email.  
 24 **Q.** Can we move to the next day, please, 1 August  
 25 2013, and look at POL00139746. An email from  
 46

1 was some element of that within the wider Post  
 2 Office.  
 3 **Q.** What do you mean by the "wider Post Office"?  
 4 **A.** Just within the Post Office itself.  
 5 **Q.** What, a clerk in Cleethorpes or a branch manager  
 6 in Bodmin, or what, within the wider Post  
 7 Office?  
 8 **A.** I would say the corporate level community.  
 9 **Q.** Who, please?  
 10 **A.** I can't recall.  
 11 **Q.** How widespread was this myth?  
 12 **A.** I can't recall.  
 13 **Q.** Was it a myth that you actively encouraged and  
 14 fostered?  
 15 **A.** No.  
 16 **Q.** Was it a myth that you disabused people of?  
 17 **A.** No.  
 18 **Q.** You let it persist?  
 19 **A.** By the email exchange with Susan Crichton,  
 20 I ensured that there were minutes made. We were  
 21 briefing solicitors in that meeting, so that  
 22 they were fully informed of what's going on, and  
 23 then they could then decide what they wanted to  
 24 disclose or use.  
 25 **Q.** In your witness statement of yesterday, you pick  
 48

1 up on the language used in this email here, and  
 2 draw a comparison to what Andrew Parsons said in  
 3 the first meeting on 19 July.

4 **A.** Yes.

5 **Q.** What's the point that you're making?

6 **A.** That's the communication that was coming from  
 7 lawyers.

8 **Q.** What's the point that you're making?

9 **A.** In terms of lawyers, we were saying that, if  
 10 it's written down, it's disclosable; if it's  
 11 not, then technically it's not. And that's from  
 12 an external lawyer as well.

13 **Q.** What's the significance of that, in your mind?

14 **A.** Just relaying around this myth element of where  
 15 it may have come from or what was going on in  
 16 the Post Office.

17 **Q.** So I understand it correctly, you're saying it  
 18 is maybe an explanation for the request for  
 19 advice, that the common myth might be  
 20 a reference, given the similarity and language  
 21 used, to what Andrew Parsons from Bond Dickinson  
 22 had said in that first meeting?

23 **A.** Reading into that, yes.

24 **Q.** Thank you. But, in any event, aside from what  
 25 Andrew Parsons from Bond Dickinson said, about

49

1 practice, was it?

2 **A.** No.

3 **Q.** Was that because of the intervention of Susan  
 4 Crichton?

5 **A.** Going by my email, that appears to be the case.

6 **Q.** In that there weren't to be centrally retained  
 7 minutes, and such minutes were not to be  
 8 disseminated?

9 **A.** Minutes were to be taken, that was very clear in  
 10 my email exchange, and they were taken. They  
 11 were retained and were available. But, yes, in  
 12 terms of the dissemination.

13 **Q.** Can we move down to paragraph 4.

14 "Three such conference calls were convened,  
 15 each conducted on Wednesday. A representative  
 16 of Cartwright King 'attended' each meeting. A  
 17 minute-taker was appointed for each call and  
 18 I understand that the minute-takers retain their  
 19 own handwritten minutes."

20 Is that accurate, to your knowledge --

21 **A.** Um --

22 **Q.** -- or was that accurate by 2 August?

23 **A.** I can't recall because I wasn't there.  
 24 I presume Rob King or Dave Posnett, who were  
 25 attending, were making the minutes.

51

1 if it's not written down then, technically, it's  
 2 not disclosable, you're telling us that it was  
 3 also a myth that was circulating within the Post  
 4 Office more generally at this time?

5 **A.** Yes.

6 **Q.** Can we move to the next day, please, 2 August  
 7 2013, POL00006799. This is the second advice,  
 8 the so-called shredding advice of 2 August 2013  
 9 that we looked at earlier to hear about the  
 10 inspiration for the weekly hub meetings and, do  
 11 you remember, we looked at paragraphs 1, 2, 3  
 12 and 4.

13 If we look again at 3, please, at the foot  
 14 of the page, I asked you about the first  
 15 sentence and whether it was accurate and you  
 16 said yes. The second sentence:

17 "Participants were informed that they should  
 18 bring all Horizon-related issues they had  
 19 encountered to the meeting; minutes were to be  
 20 taken, centrally retained and disseminated to  
 21 those who required the information, this list to  
 22 include [the Post Office's] Horizon expert  
 23 witness."

24 That appears to be the suggestion that  
 25 Mr Clarke made. That wasn't translated into

50

1 **Q.** Do you know what happened to any of those  
 2 handwritten minutes?

3 **A.** Well, they were all retained because the minutes  
 4 were ultimately circulated from my email  
 5 exchange with Susan Crichton.

6 **Q.** Was that typed-up versions of the Posnett-King  
 7 handwritten notes?

8 **A.** I don't know.

9 **Q.** Moving on to paragraph 5:

10 "At some point following the conclusion of  
 11 the third conference call, which I understand to  
 12 have taken place on the morning of Wednesday,  
 13 31 July, it became unclear as to whether and to  
 14 what extent material was either being retained  
 15 centrally or disseminated. The following  
 16 information has been relayed to me:

17 "i. The minutes of a previous conference  
 18 call had been typed and emailed to a number of  
 19 persons. An instruction was then given that  
 20 those emails and minutes should be, and have  
 21 been, destroyed: the word 'shredded' was  
 22 conveyed to me."

23 Did you give that instruction, that the  
 24 electronic records and emails of a previous  
 25 conference call should be destroyed?

52

1 A. I have no recall from that period, from 10 years  
2 ago, but that is not me. That's just not me,  
3 what I would say or ask.

4 Q. Have you any knowledge of such an instruction  
5 being given?

6 A. No.

7 Q. Who would be in a position to give such  
8 an instruction, who would have the power, the  
9 responsibility, the function to give such  
10 an instruction?

11 A. A number of people, I'd guess.

12 Q. Who is within that number?

13 A. Obviously, my line manager, me --

14 Q. So if you can name them: Susan Crichton?

15 A. Susan Crichton.

16 Q. You?

17 A. Me, and then Rob King as chair of that and,  
18 probably, I don't know, other people.

19 Q. Who else?

20 A. It's hard to say. I wouldn't expect lawyers to  
21 be saying that.

22 Q. I'm talking at the moment the people involved in  
23 this enterprise, who amongst them would have the  
24 power to give an instruction like that?

25 A. I guess those three.

53

1 Office] which I report as relayed to me  
2 verbatim:

3 "If it's not minuted it's not in the public  
4 domain and therefore not disclosable.  
5 "If it's produced it's available for  
6 disclosure -- if not minuted then technically  
7 it's not."

8 That second one is a facsimile of what  
9 Mr Singh asked in his email to Mr Smith, isn't  
10 it?

11 A. Yes.

12 Q. To (iv), please:

13 "Some at [Post Office] do not wish to minute  
14 the weekly conference calls."  
15 Do you know who at Post Office may not have  
16 wanted to minute the weekly conference calls at  
17 all?

18 A. I can only go by my email exchange with Susan  
19 Crichton and that's the brief.

20 Q. What does that mean?

21 A. She didn't want minutes being circulated to  
22 reduce the risk.

23 Q. This is a different issue again. This is not  
24 minuting the calls at all. Were you aware of  
25 any such instruction being given?

55

1 Q. Those three, okay.

2 At (ii), Mr Clarke says:  
3 "Handwritten minutes were not to be typed  
4 and should be forwarded to [Post Office] Head of  
5 Security."  
6 On that issue, did you give that  
7 instruction?

8 A. I don't recall.

9 Q. That's more similar to what you have said you  
10 had passed on originally to Mr King?

11 A. I don't recall whether I've actually asked for  
12 that or he's decided to say that.

13 Q. Did you want to be the custodian of any minutes?

14 A. That would be very unlikely that I'd want to.

15 Q. Why would it be unlikely?

16 A. Because that's not what I see my role as. If  
17 he's chair then he would have retained the  
18 minutes, the notes.

19 Q. Were you aware of any such instruction being  
20 given that the handwritten minutes that the  
21 Security Department were writing up were not to  
22 be typed but, instead, should be forwarded to  
23 you?

24 A. I don't recall.

25 Q. "iii. Advice had been given to [the Post

54

1 A. No, because, in my email exchange, I made it  
2 very clear that minutes were taken or notes were  
3 taken and retained and were available.

4 Q. Were you shown a copy of this advice at the  
5 time?

6 A. No, I don't recall seeing either of the Clarke  
7 Advices at the time.

8 Q. Were you told the gist of it?

9 A. No, I remember having a conversation with Susan  
10 Crichton and she raised a couple of areas about  
11 getting the central log more organised and,  
12 secondly, for the Security team to have  
13 disclosure training.

14 Q. What was the central log that needed to be more  
15 organised?

16 A. Of the issues that have been escalated.

17 Q. In what respect did it need more organisation?

18 A. I think all the issues, looking at the  
19 documentation, that they were in the minutes  
20 rather than actually having say, for example,  
21 a central single Excel spreadsheet, which they  
22 can be looked at and maintained and tracked.

23 Q. But nothing was passed on to you of the nature  
24 of the four things that we've seen that  
25 Mr Clarke had been told?

56

1 **A.** No, I don't recall having that conversation.  
 2 **Q.** Also on this date, 2 August, can we look,  
 3 please, at POL00139747. Can we start, please,  
 4 by looking at the second page, an email from  
 5 Mr Clarke:  
 6 "Chaps,  
 7 "Please consider first draft.  
 8 "I would not object to any suggested  
 9 alteration, including typos."  
 10 We can see from the foot of page 1 that the  
 11 subject is "ADVICE -- First Draft", sent,  
 12 I think, to a series of lawyers within  
 13 Cartwright King?  
 14 Then further up the page, we can see  
 15 an email from Steve Gelsthorpe to the same  
 16 description list:  
 17 "Dear All  
 18 "I attach a note which I believe captures  
 19 all we talked about this morning. Please check.  
 20 You chaps are closer to this than RH [I think  
 21 that's Rupert Hawke] and I and if there's  
 22 anything I have not grasped or covered you must  
 23 let me know. Equally if there is anything that  
 24 is plain wrong you must let me know.  
 25 "I have seen [Simon Clarke's] note. The  
 57

1 that there were problems with the integrity of  
 2 Horizon that ought to have been disclosed to the  
 3 criminal courts and that they were seeking to  
 4 lay blame by lying about the advice they've  
 5 received from lawyers?  
 6 **A.** No.  
 7 **Q.** Were you aware of anyone in relation to the  
 8 exercise that was being undertaken, the setting  
 9 up of the hub, and bringing of issues to the hub  
 10 and the recording of information by the hub,  
 11 lying about the advice they'd received from  
 12 Cartwright King?  
 13 **A.** Sorry, what's the exact question there, please?  
 14 **Q.** Were you aware of anyone involved in the hub  
 15 exercise lying or seeking to lie about the  
 16 advice they had received about the retention of  
 17 material and the disclosure of material?  
 18 **A.** No.  
 19 **Q.** Have you any clue why these lawyers might think  
 20 that their clients may subsequently seek to lie  
 21 about the advice that they'd received?  
 22 **A.** No.  
 23 **Q.** On your evidence, there's no grounds for these  
 24 lawyers to think that at all, is there?  
 25 **A.** Correct. We're taking notes, lawyers were on  
 59

1 comment I have is how we're going to impart the  
 2 advice to the [Post Office] that if there are  
 3 factions within it who are running around trying  
 4 to lay off blame for their own shortcomings by  
 5 lying about the advice they have received then  
 6 they lose privilege. I thought [Simon Clarke's]  
 7 advice would cover this. On reflection it may  
 8 be something for Andy [I think that's Andy Cash]  
 9 to raise with Hugh and to note or confirm in  
 10 a letter to him."

11 Do you know who the "faction" within the  
 12 Post Office Mr Gelsthorpe is referring to  
 13 there -- ie a faction running around trying to  
 14 lay off blame for their own shortcomings by  
 15 lying about the advice they've received -- is  
 16 referring to?

17 **A.** No.  
 18 **Q.** Can you assist us with any help as to who he may  
 19 be referring to?  
 20 **A.** No.  
 21 **Q.** Is he referring to you?  
 22 **A.** I can't comment on what he's referring to but  
 23 I don't consider it to be me.  
 24 **Q.** Were you aware at this time of people within  
 25 your department who were beginning to realise  
 58

1 the call.  
 2 **Q.** Can we turn to the 13 August, please,  
 3 POL00139690. This is the email exchange that  
 4 you've referred to a number of times, so far,  
 5 correct?  
 6 **A.** Correct.  
 7 **Q.** Can we start, please, at the foot of the page  
 8 and it's the exchange, as I've said, of 13 and  
 9 14 August 2013. It's an email to you from Susan  
 10 Crichton at 8.34 on 13 August, with the subject  
 11 heading of "[Wednesday] call". That's  
 12 a reference to the Horizon hub calls that we've  
 13 been talking about, which, for the most part,  
 14 happened on a Wednesday, correct?  
 15 **A.** Correct.  
 16 **Q.** She says to you:  
 17 "John -- as part of our remedial action  
 18 I had asked you to set up and chair this call,  
 19 I have had very worrying feedback re this call  
 20 from [Cartwright King] and it sounds like this  
 21 is not being chaired, the participants are  
 22 unclear as to its purpose and no minutes are  
 23 being kept -- or is there confusion.  
 24 "Can we discuss?"  
 25 Do you know what the very worrying feedback  
 60

1 was?  
 2 **A.** No, I don't recall.  
 3 **Q.** Can we look up and see your reply, please. Just  
 4 if we can check the date, 14 August 2013, at  
 5 7.39 in the morning. You say:  
 6 "Susan.  
 7 "The brief given by yourself for this  
 8 meeting was to provide in effect an under the  
 9 radar escalation point from across the business  
 10 of issues that may impact the integrity of the  
 11 Horizon System. You were frustrated in regards  
 12 to the production and circulation of the Helen  
 13 Rose report and therefore did not want any  
 14 electronic communication which may be subject to  
 15 FOI [Freedom of Information] or Disclosure."  
 16 Is it right that, essentially, in this first  
 17 paragraph, Susan Crichton made -- or you're  
 18 referring to three points that Susan Crichton  
 19 made to you: firstly, the meeting should be  
 20 under the radar, yes?  
 21 **A.** I have written that, yes.  
 22 **Q.** Well, did that faithfully reflect what she told  
 23 you?  
 24 **A.** I can only read what I'm reading here now. So  
 25 if that's what I've said, then yes.

61

1 therefore, everything was being reported to  
 2 lawyers and escalated to lawyers. But, taking  
 3 an interpretation of this, she didn't want it  
 4 widely circulated, which would then avoid legal  
 5 privilege where that could be applied.  
 6 **Q.** You're saying this is all about privilege, now.  
 7 It's nothing to do with the creation of  
 8 documents in the first place; is that what  
 9 you're telling us?  
 10 **A.** Looking at my -- one of my paragraphs, I believe  
 11 it was reducing the risk and keeping it within  
 12 legal privilege, wherever it could be.  
 13 **Q.** The words you used are an "under the radar  
 14 escalation point". Just as a matter of  
 15 language, would you agree that "under the radar"  
 16 means something that cannot be detected,  
 17 something which leaves no trace, it doesn't show  
 18 up, it cannot be seen?  
 19 **A.** As language, yes.  
 20 **Q.** Why was it important that discussion of issues  
 21 which may impact the integrity of the Horizon  
 22 System should not be detectable, that no trace  
 23 of them should be left? That they should be  
 24 conducted in a way that meant that they couldn't  
 25 subsequently be seen?

63

1 **Q.** Secondly, that she told you she was frustrated  
 2 by the production of the Helen Rose Report, yes?  
 3 **A.** Yes.  
 4 **Q.** Thirdly, she told you that electronic  
 5 communication should not be created because they  
 6 might fall to be disclosed, in one way or  
 7 another?  
 8 **A.** Yes, I think it was probably -- if you look at  
 9 my interpretation of the next email, is reducing  
 10 it to legal privilege, which is the second  
 11 paragraph, as much as possible.  
 12 **Q.** Can I examine each of those three in turn,  
 13 please. Firstly, you say:  
 14 "The brief given by yourself [ie you, Susan]  
 15 for the meeting was to provide in effect  
 16 an under the radar escalation point ..."  
 17 This was to be a hub concerning issues about  
 18 the integrity of Horizon, correct?  
 19 **A.** Correct.  
 20 **Q.** "Under the radar", would you agree, means things  
 21 which should go undetected, which should leave  
 22 no trace, which cannot be seen? Correct?  
 23 **A.** I wouldn't necessarily agree with that, looking  
 24 at my -- another paragraph in there. It was --  
 25 the meetings were conducted with lawyers,

62

1 **A.** You see, I don't agree with that because it's  
 2 been reported to solicitors on the meeting, and  
 3 I think it's more about reducing the risk of  
 4 disclosure by using legal privilege.  
 5 **MR BEER:** Sir, that's a convenient moment before we  
 6 move to the rest of the email. I wonder whether  
 7 we can take a break until 11.40.  
 8 **SIR WYN WILLIAMS:** Yes, of course. Thank you very  
 9 much.  
 10 **MR BEER:** Thank you, sir.  
 11 (11.26 am)  
 12 (A short break)  
 13 (11.40 am)  
 14 **MR BEER:** Sir, good morning, can you see and hear  
 15 me?  
 16 **SIR WYN WILLIAMS:** Yes, I can, thank you.  
 17 **MR BEER:** Thank you very much.  
 18 Mr Scott, can we continue to look at  
 19 POL00139690. We were looking at the first  
 20 paragraph. I'd asked you about the "under the  
 21 radar" comment. You continue:  
 22 "You [that's you, Susan Crichton] were  
 23 frustrated in regards to the production and  
 24 circulation of the Helen Rose report ..."  
 25 Why was Susan Crichton frustrated that the

64



1 Helen Rose report had been produced?  
 2 **A.** I cannot recall.  
 3 **Q.** Was it because it revealed a problem with the  
 4 integrity of data produced by Horizon?  
 5 **A.** I cannot recall.  
 6 **Q.** Why was she frustrated that the Helen Rose  
 7 report had been circulated?  
 8 **A.** I cannot recall. I can only go by this email.  
 9 **Q.** Was it because there was a report that was  
 10 critical of the integrity of Horizon now  
 11 available for disclosure --  
 12 **A.** I don't know.  
 13 **Q.** -- and that reports should not be written, less  
 14 still circulated, that revealed problems with  
 15 the integrity of the data produced by Horizon?  
 16 **A.** I don't know what she's thinking.  
 17 **Q.** Wouldn't you challenge her and say, "Hold on, if  
 18 there's a report that's critical of the  
 19 integrity of the data that Horizon is producing,  
 20 we prosecute people using that data and they get  
 21 sent to prison; it's good that such reports are  
 22 produced and it's really good if they're  
 23 disclosed".  
 24 Isn't that what a Head of Security, a former  
 25 police officer, would say, to somebody who is

65

1 **A.** Must have been a conversation with her.  
 2 **Q.** So the General Counsel was saying, "In this  
 3 enterprise concerning the integrity of Horizon,  
 4 I don't want electronic communications created  
 5 which may be the subject of disclosure to  
 6 a court", correct?  
 7 **A.** I can any go by this email.  
 8 **Q.** So the answer would be yes, then --  
 9 **A.** Yes.  
 10 **Q.** -- because that's what the email says in terms?  
 11 **A.** Yes.  
 12 **Q.** Again, would you have challenged her?  
 13 **A.** I may have. I may not. I can't recollect.  
 14 **Q.** Why may you not have challenged her?  
 15 **A.** Because I just cannot recall. I'd like to think  
 16 I challenged her.  
 17 **Q.** Was the reality that you wouldn't challenge her  
 18 because you were part of an enterprise too that  
 19 didn't want the creation of electronic  
 20 communications which may be the subject of  
 21 disclosure to a court?  
 22 **A.** No. I ensured that there were notes taken.  
 23 **Q.** Handwritten notes?  
 24 **A.** Handwritten notes or whatever notes --  
 25 **Q.** No, handwritten notes: that's what you ensured,

67

1 saying, "Don't write reports and don't circulate  
 2 them"?  
 3 **A.** I guess that's a good opinion.  
 4 **Q.** Did you say that?  
 5 **A.** I can't recollect. I don't know whether  
 6 I challenged or not.  
 7 **Q.** Your email continues that:  
 8 "... and therefore [she] did not want any  
 9 electronic communication which may be subject to  
 10 [Freedom of Information] or Disclosure."  
 11 "Disclosure", capital D there, means  
 12 disclosure to a court, yes?  
 13 **A.** I can only go by that and I presume the  
 14 interpretation, yes.  
 15 **Q.** How did you come to believe that the Post  
 16 Office's General Counsel, Susan Crichton, did  
 17 not want any electronic communications created  
 18 which may be the subject of disclosure to  
 19 a court?  
 20 **A.** Sorry, what's the first part of the question:  
 21 how did?  
 22 **Q.** How did you come to believe that Susan Crichton  
 23 did not want any electronic communications  
 24 created which may be the subject of disclosure  
 25 to a court?

66

1 isn't it?  
 2 **A.** Yes.  
 3 **Q.** Why did you want handwritten notes to be  
 4 created?  
 5 **A.** To ensure that all the information was captured.  
 6 **Q.** Why not electronic notes?  
 7 **A.** Because that's the brief I had from Susan  
 8 Crichton.  
 9 **Q.** It's because they're not easily discoverable,  
 10 isn't it?  
 11 **A.** I don't know on that one.  
 12 **Q.** They leave no trace, don't they? They can be  
 13 hidden away in a cupboard, can't they?  
 14 **A.** I can only take my brief from Susan.  
 15 **Q.** An electronic note leaves a footprint, doesn't  
 16 it?  
 17 **A.** Yes.  
 18 **Q.** The fact that it existed but has been deleted  
 19 leaves a footprint, doesn't it?  
 20 **A.** Yes.  
 21 **Q.** That's why you don't want electronic notes  
 22 created, isn't it?  
 23 **A.** But notes were created. Notes were maintained.  
 24 **Q.** I'm asking you about why you wanted handwritten  
 25 notes not electronic notes?

68

1 A. Because that's the brief I had from Susan  
 2 Crichton.  
 3 Q. It's because they are less likely to be found  
 4 and disclosed, isn't it?  
 5 A. *(Non-verbal answer)*  
 6 Q. Mr Scott?  
 7 A. Mm-hm?  
 8 Q. It's because they are less likely to be founding  
 9 and disclosed, isn't it?  
 10 A. In terms of that she -- I can only assume from  
 11 my second paragraph that she wanted to reduce  
 12 the risk of FOI disclosure with the legal  
 13 privilege not wrapped around it.  
 14 Q. Let's turn to the second paragraph:  
 15 "The conference calls have been set up and  
 16 they are chaired by a senior manager from the  
 17 Security team and then I'm briefed thereafter  
 18 (I wasn't aware I had to specifically Chair, but  
 19 that is easily remedied). At the outset the  
 20 purpose of the call was given that this was  
 21 an informal escalation point and no electronic  
 22 notes would be taken or circulated [and then]  
 23 and communication would be created", which looks  
 24 likely an incomplete part of a sentence.  
 25 "Written notes have been taken for each call  
 69

1 an electronic record, isn't it?  
 2 A. Yes.  
 3 Q. It leaves a footprint, even if it's deleted,  
 4 doesn't it?  
 5 A. Yes.  
 6 Q. Whereas a written note can be hidden, concealed  
 7 or even destroyed, can't it?  
 8 A. In principle.  
 9 Q. You say here:  
 10 "Written notes have been taken for each call  
 11 and activity has been driven behind the scenes."  
 12 Was that done on the instructions of Post  
 13 Office's General Counsel, Susan Crichton?  
 14 A. Going by this email, I'd say, yes.  
 15 Q. Did she instruct you that only written notes  
 16 should be kept?  
 17 A. Going by this email, I'd say, yes.  
 18 Q. It says, just in the line above the ones  
 19 highlighted:  
 20 "At the outset the purpose of the call was  
 21 given that", and then following.  
 22 Did you give Mr King the instruction that's  
 23 referred to there?  
 24 A. Sorry, say that one again, please?  
 25 Q. Yes, the line which says, "At the outset," ie at  
 71

1 and activity has been driven behind the scenes."  
 2 Just stopping there. Why would electronic  
 3 notes not be taken?  
 4 A. Because that's the brief.  
 5 Q. Is it because the taking of an electronic note  
 6 would create a potentially disclosable record of  
 7 the call?  
 8 A. Potentially, yes.  
 9 Q. Was it so that disclosure obligations in  
 10 criminal proceedings could be avoided: if you  
 11 don't create an electronic record of  
 12 a discussion, you don't have to disclose it?  
 13 A. No, because the meetings were involving lawyers,  
 14 both internal and external. They were being  
 15 briefed on all the issues being escalated and  
 16 notes were being taken.  
 17 Q. An electronic record has the distinct  
 18 disadvantage, doesn't it, would you agree, for  
 19 a person who wishes to subvert their disclosure  
 20 obligations, that an electronic record can be  
 21 looked for and more easily found by others?  
 22 A. Correct, it's more easily --  
 23 Q. Sorry?  
 24 A. Correct, it's more identifiable.  
 25 Q. It's difficult to remove all traces of  
 70

1 the outset of the conference calls:  
 2 "... the purpose of the call was given that  
 3 this was an informal escalation point and no  
 4 electronic notes would be taken or circulated  
 5 ..."  
 6 Did you give that instruction to Mr King?  
 7 A. Going by this email, I suspect I did pass that  
 8 brief on to Rob King.  
 9 Q. Did anyone that you spoke to ever push back and  
 10 say, "Hold on, why aren't we allowed to keep  
 11 an electronic record?"  
 12 A. I've no recollection.  
 13 Q. Did anyone say, "Hold on, why aren't we allowed  
 14 to communicate about these matters using  
 15 electronic means?"  
 16 A. No recollection.  
 17 Q. Was there a common understanding, a meeting of  
 18 minds, amongst those in the Security Department  
 19 and those on the call that the reasons for not  
 20 creating disclosable records about Horizon  
 21 integrity issues was that that would avoid  
 22 having to disclose documents about Horizon  
 23 integrity issues in the future?  
 24 A. I've no recollection but that wasn't the culture  
 25 within the team.  
 72

1 Q. It wasn't the culture?  
 2 A. No. Notes were made, solicitors were briefed.  
 3 Q. You continue:  
 4 "For example, a potential Horizon glitch was  
 5 raised that had been reported previously to  
 6 Simon Baker. This was then managed consequently  
 7 directly with Rodric Williams and Steve Beddoe  
 8 by myself in a manner to bring it under legal  
 9 privilege as far as possible."  
 10 So you managed an issue to bring it under  
 11 legal privilege as far as possible. What did  
 12 you do to bring this issue under legal privilege  
 13 as far as possible?  
 14 A. I can only go by that email, as in I must have  
 15 brought Steve Beddoe into contact with Roderick  
 16 Williams, who would have then dealt from there  
 17 on in.  
 18 Q. So you involved a lawyer, is that right? Is  
 19 that what you're saying?  
 20 A. *(The witness nodded)*.  
 21 And he would determine what's legal  
 22 privilege or not.  
 23 Q. Why did you want to manage the issue under the  
 24 cloak of legal privilege?  
 25 A. Because that's the direction in terms of the

73

1 integrity issues should be managed, so far as  
 2 possible, under legal privilege?  
 3 A. I have no idea.  
 4 Q. Who are the possible candidates for it?  
 5 A. Clearly my line manager Susan Crichton. There  
 6 may be others.  
 7 Q. Can we move on, please, to paragraph 5, which is  
 8 the last paragraph the one beginning "Clearly":  
 9 "Clearly I will now attend the conference  
 10 calls as Chair and following on from the  
 11 previous discussions and the steer below, unless  
 12 otherwise directed, this will become a formal  
 13 meeting with terms of reference, electronic  
 14 notes, actions and appropriate governance within  
 15 such approach. This will be built into the  
 16 operating and governance model and the previous  
 17 notes and actions over the last three will now  
 18 be electronically recorded and circulated. This  
 19 does run the risk that more communication will  
 20 be generated electronically with issues, reports  
 21 and actions responded to etc that may include  
 22 inappropriate comments, opinion, assumptions  
 23 that may be subject to FOI and Disclosure (as in  
 24 the Helen Rose report)."  
 25 To your recollection, was there a reply to

75

1 Legal Services wanted to take. They wanted to  
 2 have access and sight and decide whether they  
 3 wanted legal privilege, as applicable, or not,  
 4 going by that email.  
 5 Q. You were aware of Horizon system issues that  
 6 would require management by both the Post Office  
 7 and Fujitsu at this time --  
 8 A. Yes.  
 9 Q. -- including Horizon system issues that could  
 10 lead to discrepancies or shortfalls or losses  
 11 being shown?  
 12 A. I was aware there was issues being raised.  
 13 Q. Why would those require to be managed "in  
 14 a manner to bring them under legal privilege as  
 15 far as possible"?  
 16 A. I can't recollect.  
 17 Q. Whose idea was it to manage Horizon system  
 18 integrity issues in a way to bring them under  
 19 legal privilege, as far as possible?  
 20 A. I can't recollect.  
 21 Q. Was it a decision of Post Office or Fujitsu or  
 22 both?  
 23 A. I've no idea on that.  
 24 Q. If it was within the Post Office, who was  
 25 responsible for determining that Horizon

74

1 this from Susan Crichton?  
 2 A. I don't recall. I don't even recall this email  
 3 until it was sent to me.  
 4 Q. To the best of your recollection, did she say,  
 5 "Hold on, we've got disclosure obligations.  
 6 That's not a reason not to create documents"?  
 7 A. I've no recollection.  
 8 Q. Why were you raising the risk of the generation  
 9 of information electronically that may be the  
 10 subject to disclosure in a court?  
 11 A. Sorry, can you --  
 12 Q. Yes. In that last paragraph, why were you  
 13 running the risk, saying, "If I do what you're  
 14 now telling me to do, which is have a more  
 15 formal meeting with some terms of reference,  
 16 creating electronic notes, operating under  
 17 a governance model, you should know that that's  
 18 going to create documents that might be  
 19 disclosed"; why were you telling her that?  
 20 A. Because it appears from the earlier paragraphs  
 21 that she didn't want documents widely  
 22 circulated. Then that would come -- avoid legal  
 23 privilege.  
 24 Q. So were you saying, "Be careful what you wish  
 25 for, Susan"?

76

1 A. I can only go by this email.  
 2 Q. Is that what you're essentially saying?  
 3 A. I'm not too sure what I was saying, in terms  
 4 of --  
 5 Q. Well, help us.  
 6 A. I'm just advising her, then, that where she was  
 7 challenging around circulation of the Helen Rose  
 8 report, then, obviously, that's similar. It may  
 9 be available for more disclosure or Freedom of  
 10 Information.  
 11 Q. In any event, does this exchange indicate that  
 12 there hadn't been a similar formal route or  
 13 mechanism for regular liaison between Legal and  
 14 Security on Horizon integrity issues until after  
 15 the first Simon Clarke advice was written?  
 16 A. I can't recollect.  
 17 Q. Well, he was suggesting it be introduced, if you  
 18 remember.  
 19 A. Mm-hm.  
 20 Q. Does that tell us that it doesn't exist  
 21 beforehand?  
 22 A. That may have been the case but obviously  
 23 I wouldn't have known if the Security Operations  
 24 team for fraud were having conversations already  
 25 with Cartwright King. So I wouldn't have known

77

1 call] from JS". Again, I'm going to assume that  
 2 that's Jarnail Singh because of the description  
 3 of you as John Scott rather than JS:  
 4 "[Telephone call] from [Jarnail Singh].  
 5 John Scott will be in the [conference] call,  
 6 [Martin Smith] said not appropriate."  
 7 Had you done anything to your understanding,  
 8 that was wrong that meant it would be  
 9 inappropriate for you to be included in the next  
 10 conference call?  
 11 A. No.  
 12 Q. On your account, you'd just been following  
 13 orders?  
 14 A. Yes.  
 15 Q. Yet it seems that it was not appropriate,  
 16 according to Mr Smith, for you to be on the  
 17 call?  
 18 A. That's what he's stated.  
 19 Q. Had you done anything that might make it  
 20 inappropriate for you to join the conference  
 21 call?  
 22 A. No.  
 23 Q. In fact, I think the record shows that you did  
 24 attend the conference call on the 14th?  
 25 A. Yes.

79

1 what their activity was.  
 2 Q. Can we turn to the next day, please -- that  
 3 document can come down -- and look at  
 4 POL00139749. This is an attendance note of  
 5 Martin Smith of Cartwright King of the 14 August  
 6 2013. Under the "Detail", it records "MJS to  
 7 SC", who at the moment I'm going to take to mean  
 8 Susan Crichton?  
 9 A. Mm-hm.  
 10 Q. "John S will not be on conference call. He  
 11 admitted in an email to her last night to  
 12 sending out [instructions] to shred."  
 13 Did you send such an email to Susan  
 14 Crichton?  
 15 A. No, I would not do that.  
 16 Q. Did you say anything to that effect to Susan  
 17 Crichton?  
 18 A. I can't recall if I've had a conversation with  
 19 her but that's not a thing would say.  
 20 Q. Do you know where Susan Crichton may have got  
 21 such an idea from?  
 22 A. No.  
 23 Q. Can we turn to POL00139748. This is later that  
 24 day, 14 August. Again, an attendance note by  
 25 Mr Smith, and look at the "Detail", "[Telephone

78

1 Q. Can we divert for a moment from this period of  
 2 July and August 2013 and look back at an earlier  
 3 episode to see whether it assists us. It's  
 4 POL00107696. I wonder if we can just start at  
 5 the bottom of page 2, please, thank you.  
 6 Can we see a message from Emily  
 7 Springford -- do you remember who she was --  
 8 A. No.  
 9 Q. -- to a collection of people, including Angela  
 10 van den Bogerd, Hugh Flemington, Susan Crichton  
 11 and you. The heading is "JFSA claims --  
 12 disclosure and evidence gathering", and the  
 13 email is titled "Privileged and confidential".  
 14 "Dear all, [then over the page]  
 15 "As you are aware, [the Post Office] has  
 16 received 4 letters of claim from former  
 17 subpostmasters, making a number of allegations  
 18 about the training they received, the support  
 19 available to them in using the Horizon System,  
 20 and the Horizon System itself. There is  
 21 a possibility that these [claims] will be  
 22 followed up with Court proceedings, in which  
 23 case [the Post Office] will have a duty to  
 24 disclose to the claimants all documents relevant  
 25 to the claims, even if they might adversely

80

1 affect [the Post Office's] defence."

2 Do you agree with everything so far that's  
3 said?

4 **A.** Yes.

5 **Q.** "This obligation extends to soft copy documents  
6 (emails, and all documents stored on the IT  
7 network, hard drives, handheld devices and so  
8 on) as well as hard copy documents and  
9 manuscript notes.

10 "Please ensure that this communication  
11 reaches everyone in your department who has  
12 access to, or who is in a position to create,  
13 documents relating to the issues arising in the  
14 claims (as set out more fully below). I have  
15 started a list of teams which we believe may  
16 hold relevant documents. The list is attached:  
17 I should be grateful if you would let me know of  
18 any other teams which might hold documents  
19 relevant to the claims."

20 So this is saying we've got four letters of  
21 claim in from JFSA claims and there are some  
22 disclosure obligations that arise accordingly,  
23 agreed?

24 **A.** Yes.

25 **Q.** If we scroll down, "Document preservation":

81

1 suspend within your department, and the dates on  
2 which they are suspended, together with a note  
3 of any other steps you take to ensure that your  
4 department complies with the above  
5 requirements."

6 Do you agree with everything so far --

7 **A.** Yes.

8 **Q.** -- as an understanding, correctly, of disclosure  
9 obligations?

10 **A.** Yes.

11 **Q.** Under "Document creation", then:

12 "It is very important that we control the  
13 creation of documents which relate to any of the  
14 above issues and which might be potentially  
15 damaging to [Post Office's] defence to the  
16 claims, as these may have to be disclosed if  
17 these claims proceed to litigation. Your staff  
18 should therefore think very carefully before  
19 committing to writing anything relating to the  
20 above issues which is critical of our own  
21 processes or systems, including emails, reports  
22 or briefing notes. We appreciate that this will  
23 not always be practicable, however.

24 "Where it is necessary to create a document  
25 containing critical comment on these issues, it

83

1 "[The Post Office] must take immediate steps  
2 to preserve all documents which might  
3 potentially be relevant to these claims.

4 'Relevant' documents are those which contain  
5 information about the issues below:

6 "the subpostmasters or branches in question

7 ...

8 "the recruitment of subpostmasters

9 "the training given to subpostmasters

10 "the support given to subpostmasters in  
11 using the Horizon System ...

12 "the integrity of the Horizon System

13 "[the Post Office's] branch accounting  
14 procedures.

15 "Please note that no historic time limit  
16 applies, so that all documentation within these  
17 categories should be preserved, regardless of  
18 when it was created.

19 "Could ... you please inform the members of  
20 your teams who hold or create documents in these  
21 categories that they should not delete or  
22 destroy any documents in these categories until  
23 further notice.

24 "It is important that you keep a note of any  
25 routine document destruction policies that you

82

1 will in certain circumstances be possible to  
2 claim privilege over the document, so that [the  
3 Post Office] will not have to disclose it in any  
4 proceedings. As litigation is now a distinct  
5 possibility, the document will be privileged if  
6 its dominant purpose is to give/receive legal  
7 advice about the litigation or to gather  
8 evidence for use in the litigation. This also  
9 applies to communications with third parties --  
10 ie with other organisations -- provided they are  
11 confidential and their dominant purpose is as  
12 set out above. All of the following steps  
13 should be taken in order to maximise the chances  
14 of privilege attaching to [a] document:

15 "If the dominant purpose of the  
16 communication is not to obtain legal advice, try  
17 to structure the document in such a way that its  
18 dominant purpose can be said to be evidence  
19 gathering for use in litigation;

20 "Mark every such communication 'legally  
21 privileged and confidential';

22 "If you are sending the document to someone,  
23 state in the covering email [et cetera] that you  
24 are not waiving privilege by doing so;

25 "Request that the recipient of

84

1 a communication confirm that the document will  
2 be kept confidential and that he/she will not  
3 forward it to anyone else;

4 "Think very carefully before 'replying to  
5 all' on an email ...

6 "Where possible and appropriate, copy a  
7 member of Legal Services into the communication,  
8 and make [sure] that you are doing so to enable  
9 them to advise on the content. Please note that  
10 copying a member of Legal Services into the  
11 communication alone will not necessarily  
12 suffice."

13 Now, we may in due course investigate the  
14 propriety of some of the advice given there with  
15 other witnesses and how it was subsequently  
16 acted upon, but how did you understand the  
17 advice that you were given here?

18 **A.** Is there a particular part or the whole lot?

19 **Q.** The whole lot.

20 **A.** It was giving advice on disclosure.

21 **Q.** Was it saying to you, "Be careful about the  
22 creation of documents that might be damaging or  
23 potentially damaging to our defence of the  
24 claim, and do everything you can to badge them  
25 up as privileged"?

85

1 an assessment whether something was disclosable  
2 or not.

3 **Q.** What's that got to do with only writing things  
4 on pieces of paper and not recording them  
5 electronically?

6 **A.** Because, once it goes much more broader, then --  
7 to a broader audience, then it's outside of the  
8 legal framework, the lawyers can't make  
9 an assessment or can make an assessment but it's  
10 broader.

11 **Q.** Can we go back to Mr Clarke's so-called  
12 shredding advice at POL00006799, and can we turn  
13 to page 5, please, and look at paragraph 9. He  
14 advises the Post Office:

15 "The duty to record and retain material  
16 cannot be abrogated. To do so would amount to  
17 a breach of the law and, in the case of  
18 solicitors and counsel, serious breaches of  
19 their respective Codes of Conduct. Accordingly,  
20 no solicitor, no firm of solicitors and no  
21 barrister may be a party to a breach of the duty  
22 to record and retain. Neither may they act in  
23 circumstances where they are aware, or become  
24 aware, that a practice has developed within the  
25 investigative or prosecutorial function such

87

1 **A.** In part, looking at that, yes.

2 **Q.** Did that form part of your considerations when,  
3 in August 2013, you had to make decisions as to  
4 the approach to be taken with the Horizon hub  
5 meetings on Wednesdays?

6 **A.** So I don't recollect this email at all and  
7 whether it had a part on that decision, 2013, or  
8 not, I have no idea.

9 **Q.** It says "It is important that we control the  
10 creation of documents. Your Staff should think  
11 very carefully about committing anything to  
12 writing, in particular if they are critical of  
13 the Horizon System or the reliable of its data".  
14 Isn't that what you were instructing should  
15 occur in the July and August Horizon hub calls?

16 **A.** In terms of the hub calls it was about informing  
17 the solicitors in terms of all the issues and  
18 for them to decide whether legal privilege would  
19 then apply.

20 **Q.** Sorry, say that again: in terms of the hub calls  
21 it was about informing the solicitors for them  
22 to decide whether legal privilege should apply?

23 **A.** So, obviously, the issues were being picked up  
24 and dealt with and progressed but, of course,  
25 you had lawyers on the call to make

86

1 that the duty to record and retain is being  
2 deliberately flouted, or avoided. Again to do  
3 so would amount to breaches of both the law and  
4 Codes of [Practice]."

5 Then this:

6 "A decision-based failure to record and  
7 retain material would readily amount to such  
8 a practice. Such a decision, where it is taken  
9 partly or wholly in order to avoid future  
10 disclosure obligations, may well amount to  
11 a conspiracy to pervert the course of justice on  
12 the part of those taking such a decision, and  
13 those who implement such a decision where they  
14 do so in the knowledge that it was taken partly  
15 or wholly for that purpose."

16 Was the purpose of the instruction that you  
17 gave a decision to not record and retain  
18 material in order to avoid disclosure  
19 obligations?

20 **A.** No. We were recording. We were taking notes.

21 **Q.** Sorry?

22 **A.** We were taking notes.

23 **Q.** On pieces of paper?

24 **A.** On pieces of paper but they were there. They  
25 were retained and on the August they were still

88

1 there and retained and able to be used and  
 2 circulated.  
 3 **Q.** Can we go, after that excursion, back to where  
 4 we were in the chronology, to POL00083930. As  
 5 I mentioned earlier, the conference call on  
 6 14 August shows that you're present. Despite  
 7 what we'd read earlier about it being  
 8 inappropriate for you to join the call, you and  
 9 others are on it.  
 10 Were you ever told that there was doubt  
 11 about whether you were going to be permitted to  
 12 take part in this call and future conference  
 13 calls?  
 14 **A.** No, I don't recall that at all.  
 15 **Q.** After your email exchange of the 13th and this  
 16 day, the 14th, with Ms Crichton, you just turned  
 17 up on the phone?  
 18 **A.** No. I said in my email that I would now be  
 19 attending and chairing.  
 20 **Q.** Yes, but you didn't know that there had been in  
 21 the background this discussion amongst lawyers  
 22 about whether --  
 23 **A.** No.  
 24 **Q.** -- it would be appropriate for you to attend or  
 25 not?

89

1 interview. These will be fed through to legal  
 2 and a record made of them. I still maintain  
 3 that security is not the best place though to  
 4 resolve issues with the Horizon System. As you  
 5 know John Scott is chairing this con call going  
 6 forward. It may be useful if you reply to John  
 7 Susan's concerns. Speak tomorrow."  
 8 The line "However with an initial mandate of  
 9 not circulating notes made", does that reflect  
 10 your understanding of the initial mandate there  
 11 was to be no records circulated for these  
 12 meetings?  
 13 **A.** Yes, but notes were to be made.  
 14 **Q.** He says that Security is not the best place to  
 15 resolve issues with the Horizon System. Do you  
 16 know why that was?  
 17 **A.** Because I think the -- any issues escalated may  
 18 be much broader than Security.  
 19 **Q.** Was this discussed with you?  
 20 **A.** I can't recall.  
 21 **Q.** The last line "It may be useful if you reply to  
 22 John or if you relay to John Susan's concerns",  
 23 do you know what Susan Crichton's ongoing  
 24 concerns were?  
 25 **A.** He sent a document which outlines -- ie identify

91

1 **A.** No.  
 2 **Q.** You just joined the call?  
 3 Can we move forward to 19 August, please,  
 4 POL00139691. This is a later email trail  
 5 involving Rob King, Jarnail Singh and then  
 6 earlier Dave Posnett and Andy Parsons. I don't  
 7 think you're copied into it. Can we look at the  
 8 second page, please, then look at the foot of  
 9 the first page, please -- and then scroll up,  
 10 please. We see an email from Mr King of your  
 11 department to Mr Singh:  
 12 "Apologies if I seemed a little evasive  
 13 earlier. To date I have worked to the remit of  
 14 establishing a group whereby issues and concerns  
 15 are raised and recorded (see below). However  
 16 with an initial mandate of not circulating notes  
 17 made, it is difficult to apply the usual  
 18 governance on the process. Notes have been  
 19 typed, actions captured and will be circulated.  
 20 This should provide the proper framework for  
 21 resolving issues. I was under the impression  
 22 that a working group would be set up to deal  
 23 with these, placing the weekly conference call  
 24 superfluous. Investigators have been instructed  
 25 to report back any issues raised during

90

1 the issues and hunt down the issues and root  
 2 cause and deal with them.  
 3 **Q.** That can come down. Thank you. There are  
 4 "Regular Calls re Horizon Issues" on 21 August,  
 5 I'm just going to give the reference rather than  
 6 looking at it, POL00139726 -- at which you're  
 7 an attendee, and 28 August, POL00083935, and you  
 8 are an attendee.  
 9 In September 2013, Susan Crichton left the  
 10 Post Office, correct?  
 11 **A.** I believe it's about that time.  
 12 **Q.** There wasn't an immediate replacement for her,  
 13 was there? Somebody had to act up as  
 14 an interim, do you remember that?  
 15 **A.** No, I thought a -- well, an interim person was  
 16 employed. Not -- an interim General Counsel  
 17 from external.  
 18 **Q.** Why did Susan Crichton leave?  
 19 **A.** I have no idea.  
 20 **Q.** She was somebody with whom you worked closely?  
 21 **A.** She was my line manager, yes.  
 22 **Q.** And she was somebody who you worked closely  
 23 with?  
 24 **A.** Yes.  
 25 **Q.** Was there no discussion as to why she left?

92

1 A. No.  
 2 Q. Did she leave suddenly?  
 3 A. I think she left the next day, after informing  
 4 me or others.  
 5 Q. Was there no discussion about why she departed?  
 6 A. I would not discuss that with a line manager.  
 7 That's personal to them.  
 8 Q. Did she not say to you "I'm leaving because X  
 9 and there isn't somebody in place ready to take  
 10 over from me. We've got to get an interim in"?  
 11 A. I don't recall, no.  
 12 Q. Was her departure anything to do with the issues  
 13 we've just been looking at this morning?  
 14 A. I have no idea at all.  
 15 Q. I'll leave the Susan Crichton thing. We've got  
 16 no documents that help us at all as to why she  
 17 said she was leaving one day and disappeared the  
 18 next.  
 19 Can we turn, please, to 9 October and look  
 20 at POL00139695.  
 21 Can we see an email of 9 October, and  
 22 I don't think you're on the copy list; is that  
 23 right?  
 24 A. I can't see my name.  
 25 Q. It's an email from Gayle Peacock from Branch

1 through it, we can see that it's a rather good  
 2 if not excellent protocol about how the  
 3 Wednesday morning telephone conferences should  
 4 be conducted about how to identify material, to  
 5 record material, to retain material which may be  
 6 the subject of duties of disclosure.  
 7 It starts off with a citation, can you see,  
 8 under the preamble, from something which is in  
 9 fact from the foreword to the *Attorney General's*  
 10 *Guidelines on Disclosure*, that disclosure is one  
 11 of the most important issues in the criminal  
 12 justice system. It reads:  
 13 "As a prosecutor, Post Office Limited is  
 14 under a positive duty to identify, record and  
 15 retain any information which might assist  
 16 a defendant in preparing or presenting his case  
 17 or which might undermine the prosecution case  
 18 against him ... we must ... be able to prove  
 19 that, where we rely information provided by  
 20 Horizon Online to prosecute, that system is  
 21 reliable and accurate; that those using the  
 22 system have been properly trained; and that  
 23 appropriate support systems are in place and  
 24 available to users. The duty extends to all  
 25 information held by the prosecutor; or to which

1 Training and Support attaching something called  
 2 "The protocol". She says:  
 3 "Apologies for the delay in circulating  
 4 these notes from last week's notes. We had  
 5 a mix up with who was taking them so I've put  
 6 some together based on the bits that I have  
 7 captured ...  
 8 "I've also attached the Protocol document  
 9 which Martin talked about on the call last week.  
 10 I think there are still a few tweaks to be made  
 11 to this but you can see the general principles."  
 12 So this is an email, would this be right, to  
 13 a working group, but not including you,  
 14 enclosing a protocol?  
 15 A. Can I see the names again, please?  
 16 Q. Sorry?  
 17 A. Can I see the names?  
 18 Q. Yes. If we just scroll up, please.  
 19 A. I don't recognise a couple of the names but most  
 20 of them are those who attend the meeting, that  
 21 I've seen in the minutes.  
 22 Q. Can we look at the protocol itself, please,  
 23 which is POL00139696. I want to try to do this  
 24 quite briefly because it's a seven-page document  
 25 but what I'm going to suggest is, when we read

1 he may have access; and to information which  
 2 came into existence before any crime was  
 3 detected but which meets the test for  
 4 disclosure.  
 5 "As a fair and public-spirited prosecutor  
 6 and always acting in the interests of justice,  
 7 Post Office will take all reasonable steps to  
 8 ensure that we are ... in a position to fully  
 9 meet our disclosure duties. Accordingly we will  
 10 in future collect and retain any and all  
 11 information which might suggest that Horizon  
 12 Online may not be working as it should, or that  
 13 our training and back-up systems are less than  
 14 we would ..."  
 15 I suspect there is nothing with which you  
 16 disagree in those two paragraphs?  
 17 A. Correct.  
 18 Q. "Those best placed to provide the information we  
 19 are required to identify, record and retain are  
 20 those within the organisation who are Horizon  
 21 Online users or those who on a regular basis  
 22 come into contact with Horizon Online and its  
 23 users. It is those persons, departments and  
 24 sections therefore at whom this protocol is  
 25 directed and who will be our front line in the



1 information gathering exercise.  
 2 "Defendants are entitled to this information  
 3 where it meets the test for disclosure and we  
 4 would not wish to be associated with any  
 5 wrongful conviction."  
 6 Over the page:  
 7 "Wednesday morning telephone conferences  
 8 "Post Office will conduct a telephone  
 9 conference on each and every Wednesday morning  
 10 ...  
 11 "The primary purpose ... will be to  
 12 Identify, Record, Retain and disseminate all  
 13 such material ... set out in [a clause] below."  
 14 2:  
 15 "Post Office will appoint a ... chair ...  
 16 "The Chair will not be a Head of Department  
 17 or section mentioned in clause 3.2 below or  
 18 a representative thereof, but may be a member of  
 19 staff of such a Department ... The Chair will  
 20 not be a person mentioned in [a clause below].  
 21 "The functions ... of the Chair are set out  
 22 in [the clause below].  
 23 "3. Attendance  
 24 "The Chair will ensure the attendance at  
 25 conferences of those Heads of Department or  
 97

1 5.1 to 5.5.  
 2 Then 6, a definition of equipment and  
 3 material subject to the protocol.  
 4 Then 6.2, additional categories of material  
 5 subject to the protocol:  
 6 "Any information, in whatever form, which  
 7 relates to or is associated with, any aspect of  
 8 the Horizon Online ... which may  
 9 "Indicate the presence ... of a defect,  
 10 'bug' fault or virus;  
 11 "Tend to suggest that any data produced may  
 12 be inaccurate, false or otherwise unreliable;  
 13 "Tend to suggest that any balance produced  
 14 may be inaccurate ... or otherwise unreliable;  
 15 "Indicate a failure, error, inadequacy or  
 16 insufficiency in the presentation of data.  
 17 "Indicate a requirement for further training  
 18 ...  
 19 "Indicate an inadequacy of back-up or  
 20 support ...  
 21 "Indicate a requirement to alter, modify,  
 22 rearrange or redefine any process", et cetera.  
 23 Would you agree that this protocol  
 24 appropriately captures the duties to create,  
 25 identify, record, retain material which may be  
 99

1 sections set out [in a clause] below, or such  
 2 departments or sections as are responsible for  
 3 the functions indicated in that clause ...  
 4 "3.2. The following are the Departments to  
 5 which [a clause] above refers.  
 6 "Criminal Law, Litigation ...  
 7 "Civil Law ...  
 8 "Post Office Security [and others]  
 9 "3.3. In addition ... the Chair will ensure  
 10 the attendance at each and every conference of  
 11 the following ..."  
 12 Scroll down please: a solicitor from Bond  
 13 Dickinson; a solicitor from Cartwright King;  
 14 a minute-taker appointed by Bond Dickinson.  
 15 They will:  
 16 "... take all reasonable steps to ensure  
 17 that the appointed representative and the  
 18 minute-taker is the same individual at each and  
 19 every conference.  
 20 "4. Functions and duties of the Chair ..."  
 21 I'm going to skip over those.  
 22 If we go over the page, please, and go to 5,  
 23 "Duties and responsibilities of persons  
 24 attending Wednesday morning Telephone  
 25 Conferences", you will see the duties set out in  
 98

1 subject to duties of disclosure?  
 2 A. Yes.  
 3 Q. Why was it not in place for a decade before?  
 4 A. I have no knowledge on that one.  
 5 Q. You were Head of Security?  
 6 A. Yes.  
 7 Q. Your department was responsible for  
 8 investigating and instigating criminal  
 9 proceedings --  
 10 A. Mm-hm.  
 11 Q. -- against hundreds of subpostmasters?  
 12 A. *(The witness nodded)*  
 13 Q. Why was a protocol like this not in place before  
 14 late 2013?  
 15 A. I did not know that these issues were not being  
 16 captured. I'd have expected the IT Department  
 17 to have been capturing these and feeding these  
 18 through, had they had concerns.  
 19 Q. Do you agree that a protocol like this should  
 20 have been in place --  
 21 A. Yes.  
 22 Q. -- at all material times when subpostmasters  
 23 were being prosecuted?  
 24 A. Yes, I think that would have been best practice.  
 25 Q. When you say "best practice" you mean required  
 100

1 practice by the law?

2 **A.** Right.

3 **Q.** That document can come down, please. In your

4 witness statement of yesterday you've analysed

5 the contents of a series of documents that were

6 created concerning the July and August 2013

7 weekly meetings and you've made points about

8 them, drawing extracts from them and analysing

9 them, over the course of 10 pages or so.

10 **A.** Yes, I've made observations.

11 **Q.** That's in relation to an allegation that's been

12 made against you in the past, that you were

13 responsible for an order that minutes should be

14 shredded?

15 **A.** Yes.

16 **Q.** When you were reviewing the sufficiency of

17 evidence to prosecute subpostmasters, did you

18 subject that evidence to the same level of

19 scrutiny?

20 **A.** In terms of prosecution decision?

21 **Q.** Yes.

22 **A.** I'd have expected to have done so, yes.

23 **Q.** Because we can see from your witness statement

24 that, where the allegation is made against you,

25 you analyse all of the material, pull parts from

101

1 prosecuted?

2 **A.** Obviously, you sent me a document where it does

3 say prosecution won't go forward.

4 **Q.** In your nine years as Head of Security --

5 **A.** Yes?

6 **Q.** -- how many times did you say that a case should

7 not be prosecuted?

8 **A.** I can't recall.

9 **Q.** Can we turn to the offender report, which you

10 just mentioned.

11 **A.** Mm-hm.

12 **Q.** So moving way from the approach taken to

13 disclosure to the creation of reports for the

14 purposes of bringing criminal and disciplinary

15 proceedings against subpostmasters and clerks.

16 Do you recall a document called "Security

17 Operations Case Compliance"?

18 **A.** No, you've sent it to me in the bundle but

19 I don't recall that at all.

20 **Q.** Can we look at it, please. POL00119917. Thank

21 you.

22 Can you see that this is a document headed

23 up "Security Operations Team -- Case Compliance"

24 so the Security Operations team came under your

25 responsibility?

103

1 here and there, put them together and draw

2 inferences from them?

3 **A.** *(The witness nodded)*

4 **Q.** Make denials, agree with certain things, yes?

5 **A.** *(The witness nodded)*

6 **Q.** Is that what you did when you were reviewing

7 files against subpostmasters?

8 **A.** I'd have read all the file documents that were

9 forwarded to me. I would have read the suspect

10 offender report. I'd have probably read the

11 tape summary and most definitely the legal

12 advice that would have been provided.

13 **Q.** Did you read the underlying material?

14 **A.** Online material?

15 **Q.** Underlying material, rather than somebody else's

16 summary or views of it?

17 **A.** I may have looked at, on occasions. I'm not

18 saying that I would look on every single

19 occasion.

20 **Q.** Or did you think, because it had passed through

21 Legal and they had recommended prosecution that

22 it was your job to rubber stamp it?

23 **A.** No, I would still be looking to -- just to know

24 and understand.

25 **Q.** Did you ever say a case should not be

102

1 **A.** Yes.

2 **Q.** This is in relation to a particular case. We've

3 got lots and lots of these, in the same or

4 similar format. Can you see that, in the

5 left-hand column, there is a reference to,

6 variously, the case file, the offender report,

7 the taped interview record, appendices A, B and

8 C, and then, scrolling down, the discipline

9 report, and then stakeholder engagement, yes?

10 **A.** Mm-hm.

11 **Q.** There are 50-items against which compliance is

12 seemingly judged; can you see that?

13 **A.** Yes.

14 **Q.** Then, in the right-hand column, there is a mark,

15 a compliance score as a percentage, which, if

16 the person submitting the file gets it all

17 right, they get 100, so 100 per cent. This

18 person submitting this file got 94 per cent; can

19 you see that?

20 Do you remember this case compliance

21 approach --

22 **A.** No, I've no recollection at all.

23 **Q.** -- in which issues are identified and

24 a weighting is given to each of them?

25 **A.** No, this will be a -- sort of, a level of

104

1 operational detail that I wouldn't have  
 2 engagement with. This would be with the Head of  
 3 Security Operations.

4 **Q.** How many people were you responsible for, when  
 5 you were Head of Security?

6 **A.** At the outset, I think it was about 110 and that  
 7 dramatically reduced over the years.

8 **Q.** To?

9 **A.** I think -- well, less than 50, I think.

10 **Q.** So you, in your nine years, wouldn't be  
 11 responsible that there was a process being  
 12 undertaken to measure case compliance with  
 13 a series of standards?

14 **A.** I'd expect it to be there but I wouldn't be  
 15 getting involved in it. That would be the Head  
 16 of Security Operations or Head of Fraud, in the  
 17 earlier days.

18 **Q.** Wouldn't you receive reports to say, "We're  
 19 doing well, we're not doing very well, on case  
 20 compliance"?

21 **A.** I don't recall receiving reports. That's not to  
 22 say I didn't get an overall measure.

23 **Q.** Were you aware of a suite of documents that were  
 24 circulated very frequently within your  
 25 department informing their staff that they were

105

1 stakeholders and Criminal Law Team to enable  
 2 a decision to be made as to the future conduct  
 3 of a case."

4 So these are the reports that you got, yes?

5 **A.** Yes.

6 **Q.** "This guide is produced for all Security  
 7 Operations managers, irrespective of location  
 8 ...  
 9 "The general principle is that the  
 10 description of investigation activities should  
 11 read in the sequence they occurred so it may be  
 12 necessary to reorder paragraphs or elements  
 13 within them. The following is only a guide ..."  
 14 Then if we look at the foot of the page,  
 15 please. Can you see --  
 16 Sorry, I've missed a part out that I should  
 17 have gone to. It's the fifth paragraph. The  
 18 one beginning "The text":  
 19 "The text element of the Suspect Offender  
 20 report should commence immediately underneath  
 21 the preamble/s. The Header/Footer on the report  
 22 should read 'Post Office Limited Confidential --  
 23 Investigation, Legal'.  
 24 We'll come back to that in a moment.  
 25 Then if we scroll down, please, we'll see

107

1 to be the subject of case compliance checks?

2 **A.** I've seen it in the bundle but I don't recollect  
 3 seeing that before.

4 **Q.** So this was going on, as you now recall it,  
 5 without you knowing?

6 **A.** As far as I'm aware, yes.

7 **Q.** Can we look at another one of the suite of  
 8 documents, please, that was distributed along  
 9 with these case compliance score sheets.  
 10 POL00118101. Can you see the heading of this  
 11 document "Post Office Limited Security  
 12 Operations Team", so the same team "Compliance,  
 13 Guide to the Preparation and Layout of  
 14 Investigation Red Label Case Files", and then  
 15 a subheading "Offender reports & Discipline  
 16 reports"?

17 Can you see that it's, at the bottom of the  
 18 page, said to be "In Confidence", and that's at  
 19 the bottom of each page.

20 If we go over the page to page 2, please,  
 21 and if we just read through the purpose of the  
 22 document:  
 23 "The purpose of the Suspect Offender report  
 24 is to provide a storyboard of events and  
 25 evidence of an investigation to the relevant

106

1 the contents starting to be listed of  
 2 an offender report: a preamble; it should have  
 3 a header and footer; and the investigation  
 4 background; the offender interview details; what  
 5 happened post-interview. Scroll down, please.

6 Then the contents of a discipline report  
 7 under paragraph 2; headers and footers;  
 8 background; offender interview details; then,  
 9 over the page, post-interview.

10 Then we scroll down. Hold on, if we go  
 11 back, please. Back up a page. Thank you.

12 The offender report, more detailed guidance  
 13 is given; preamble; headers and footers; it  
 14 repeats the point that "Post Office Limited  
 15 Confidential Investigation, Legal" should be  
 16 printed.

17 Does that reflect the fact that legal  
 18 professional privilege was claimed over the  
 19 offender reports?

20 **A.** I believe it was.

21 **Q.** Can we go to -- I'm not going to read it all --  
 22 page 9, please. We're still in the part of the  
 23 document that's dealing with the offender  
 24 report, rather than the discipline report.  
 25 1.24:

108

1 "Details of failures in security,  
2 supervision, procedures and product integrity.  
3 This must be a comprehensive list of all  
4 identified failures in security, supervision,  
5 procedures and product integrity. It must be  
6 highlighted bold in the report. Where the  
7 investigator concludes there are no failures in  
8 security, supervision, procedures and product  
9 integrity a statement should be made and  
10 highlighted in bold."

11 Would you agree that that statement of the  
12 things to be included in the offender report,  
13 insofar as it refers to product integrity, would  
14 include anything that emerged in the  
15 investigation, whatever its source, about issues  
16 with the accuracy or reliability of Horizon  
17 data?

18 **A.** I'd expect so, yes.

19 **Q.** It would include issues about the integrity of  
20 the Horizon System and the data that it  
21 produced?

22 **A.** Yes.

23 **Q.** Would that be because those are things that are  
24 all capable of undermining a prosecution case?

25 **A.** It seems so, yes.

109

1 This must be a comprehensive list of all  
2 failures in security, supervision, procedures  
3 and product integrity. It must be highlighted  
4 in bold in the report. Where the investigator  
5 concludes there are no failures a statement to  
6 this effect should be made and highlighted in  
7 bold."

8 So the same as in relation to the offender  
9 report, agreed?

10 **A.** Yes.

11 **Q.** Again, it continues, however.

12 "Significant failures that may affect the  
13 successful likelihood of any criminal action  
14 and/or cause significant damage to the business  
15 must be confined, solely, to the confidential  
16 offender report. Care must be exercised when  
17 including failures within the Discipline Report  
18 as obviously this is disclosed to the suspect  
19 offender and may have ramifications on both the  
20 criminal elements of the enquiry as well, as  
21 being potentially damaging to the reputation or  
22 security of the business. If you are in any  
23 doubt ... discuss with your Team Leader."

24 Would you agree that this is, in Post Office  
25 written policy, a command to include only in

111

1 **Q.** They are relevant issues for a person deciding  
2 whether there is a realistic prospect of  
3 a conviction to consider --

4 **A.** Yes.

5 **Q.** -- and that such people positively need to have  
6 such material identified to them, don't they?

7 **A.** Yes.

8 **Q.** It will also assist, would you agree, in the  
9 discharge of disclosure obligations to have the  
10 material collected together and highlighted in  
11 bold in one place?

12 **A.** Yes.

13 **Q.** Can we scroll on, please. Just stop there.  
14 Just scroll up just a little bit, please, bit  
15 more.

16 We then, in paragraph 2, turn to the  
17 discipline report. We see that the header and  
18 footer of this is, by contrast, only to be "Post  
19 Office Limited Confidential: Investigation  
20 Personnel", yes?

21 **A.** Yes.

22 **Q.** Then can we get scroll through to page 10, until  
23 we get to paragraph 2.15. Thank you. It reads:

24 "Details of failures in security,  
25 supervision, procedures and product integrity.

110

1 a document that enjoys privilege any issues that  
2 may affect the successful likelihood of criminal  
3 proceedings?

4 **A.** That's how it reads.

5 **Q.** It therefore included an explicit instruction to  
6 keep secret and not to disclose any Horizon  
7 integrity issues, didn't it?

8 **A.** No, because that would be reported to the  
9 lawyers, who would then consider the requirement  
10 for disclosure out to a suspect offender or his  
11 or her lawyers.

12 **Q.** But not disclosing in a report that a suspect  
13 would see any issues that may affect the success  
14 of criminal proceedings. The reason given for  
15 that is that it was potentially damaging to the  
16 reputation of the business, isn't it?

17 **A.** The report that was given to the suspect  
18 offender would have been a discipline report  
19 around their employment or around their  
20 contract, not about any criminal investigation.  
21 That would be reported to the lawyers, who would  
22 then make a decision of what they disclose to  
23 that individual.

24 **Q.** So this is saying "Be careful not to let things  
25 leak out that might cause damage to the

112

1 business"?

2 **A.** In part, yes.

3 **Q.** Was that the prevailing attitude of mind whilst

4 you were Head of Security?

5 **A.** I'd say no, bearing in mind that we were

6 communicating out as part of the prevention

7 strategy of saying what some of the security

8 weaknesses were, so that we could actually then

9 let them know that we were monitoring it and we

10 will be putting prevention in.

11 **Q.** This document and documents in the same terms or

12 similar terms were distributed according to

13 emails that the Inquiry has received to very

14 many Security staff under your command during

15 your tenure --

16 **A.** Mm-hm.

17 **Q.** -- in your nine years, and they were told that

18 not only must they do that which is included in

19 these paragraphs but they would be audited to

20 ensure compliance to make sure that they didn't

21 breach the restrictions included here. Did you

22 know that was going on?

23 **A.** No.

24 **Q.** But it happened on your watch; how did that

25 happen?

113

1 and had it resolved.

2 **Q.** Did any of your 100 staff -- falling to 50

3 staff -- come to you in the nine years of your

4 tenure to say, "Hold on, boss, we've been asked

5 to fill out a document to say whether somebody

6 is a 'Negroid type'. I don't think that's

7 really appropriate"?

8 **A.** No.

9 **Q.** What was the purpose of using identification

10 codes for suspects and offenders?

11 **A.** I believe it's to do with official reporting to

12 the police.

13 **Q.** How was official reporting to the police

14 undertaken?

15 **A.** I can't recall.

16 **Q.** Who was responsible for reporting to the police?

17 **A.** It would be the Investigator who's in charge of

18 the case.

19 **Q.** How were they to report to the police?

20 **A.** Oh, I have no idea.

21 **Q.** What was the purpose of making a report to the

22 police of the suspect's identification?

23 **A.** I have no idea.

24 **Q.** At what stage in the process would they report

25 to the police the suspect's identification code?

115

1 **A.** I just have to give my apologies that I did not

2 see that or the senior management of the

3 Security Operations Team didn't spot it.

4 **Q.** Can we turn, please, to POL00118152. This is

5 another one of the suite of documents that was

6 regularly distributed to your staff. In the *pro*

7 *forma* for the discipline report and the offender

8 report, there was a section which required the

9 maker of the report to include an identification

10 code and this document was part of the suite of

11 documents distributed to them, telling them

12 which identification code to use. Do you see

13 anything wrong with this document?

14 **A.** Very much so. It's very racially offensive.

15 **Q.** Which parts?

16 **A.** I'd say it's all.

17 **Q.** Sorry?

18 **A.** All.

19 **Q.** This was distributed regularly to your staff on

20 your watch telling the staff that they needed to

21 use these codes and they would be audited for

22 compliance if they didn't. How did that come

23 about?

24 **A.** I have no recollection. I do not recall this

25 document. Had I seen it, I'd have challenged

114

1 **A.** I have no idea. I don't have that level of

2 operational detail.

3 **Q.** If reporting to the police was the purpose of

4 noting identification codes down for suspects,

5 wouldn't one need to know what the police

6 identification codes were, rather than these

7 Post Office ones?

8 **A.** That would make sense.

9 **Q.** Can you think of any other purpose, if the

10 purpose wasn't to report matters to the police,

11 for recording a suspect's identity --

12 **A.** No.

13 **Q.** -- ie their ethnic or racial origin?

14 **A.** No.

15 **Q.** Were any statistics compiled of how many

16 "Siamese" people were prosecuted, how many

17 "Negroid types" were prosecuted, and how many

18 "Sicilian" people were prosecuted?

19 **A.** I've no recollection of ever doing that.

20 **Q.** Would therapy any purpose in recording that

21 information?

22 **A.** No.

23 **Q.** When you saw this document, it therefore came as

24 a complete surprise to you?

25 **A.** Yes.

116

1 Q. Who was responsible for issuing case compliance  
 2 instructions to the 100, falling to 50, staff?  
 3 A. Can I just clarify, when I talk about 100 down  
 4 to 50 staff, that was across all the five  
 5 strands, not just purely the Fraud strand or the  
 6 Security Operations strand, when you make  
 7 reference to that number.  
 8 Q. Okay. So presumably a smaller number then?  
 9 A. Yes.  
 10 Q. For those involved in fraud investigation and  
 11 security operations, how many did you start with  
 12 and how many did it fall to?  
 13 A. I'd say probably in the region of around about  
 14 60 to start off with. Towards the end, I will  
 15 struggle to think, because we -- or I merged two  
 16 teams together, the preventative physical team  
 17 with the fraud team, to make the security ops,  
 18 and there was an element of multi-skilling. So  
 19 how many were actually left to do the  
 20 investigation, I couldn't actually recall.  
 21 Q. But that number, 60 at the beginning and then  
 22 less than 60 at the end, who was responsible for  
 23 issuing to them the kind of documents, the three  
 24 documents, that I have mentioned?  
 25 A. Yes, that would have been down to the senior

117

1 Q. Would they not tell you "We're issuing case  
 2 compliance requirements and auditing staff  
 3 against them"?  
 4 A. I may have been briefed at a one-to-one.  
 5 Q. But the documents that I've shown you -- the  
 6 instructions on case file compilation, the Excel  
 7 spreadsheet of case compliance scoring and the  
 8 identification codes document -- were all  
 9 a surprise to you when you saw them recently?  
 10 A. Yes. They may have come across my desk at some  
 11 point but it's not documents that I'd actually  
 12 get involved in because it's at an operational  
 13 level, that I would leave to the senior managers  
 14 of the strand.  
 15 MR BEER: Sir, thank you. I'm about to move to  
 16 a separate topic and it's just coming up to  
 17 1.00. I wonder whether we might break until  
 18 2.00.  
 19 SIR WYN WILLIAMS: Of course, yes.  
 20 I take it you're aware that you shouldn't  
 21 speak to anyone about your evidence during the  
 22 lunch break, Mr Scott. I'm sure you probably  
 23 don't want to but, if there are things that you  
 24 would wish to speak to your lawyers about, then  
 25 just let Mr Beer know what you want to talk to

119

1 management of the Security Operations team.  
 2 Q. Who was that in the relevant period?  
 3 A. What year are we talking?  
 4 Q. We've got emails showing that this was in  
 5 circulation between 2008 and 2012 and there was  
 6 further circulation, I think, up until 2016, so  
 7 really across your period of office?  
 8 A. Okay. I think I have listed it in my statement  
 9 and so I think Dave Pardoe --  
 10 Q. Yes.  
 11 A. -- Iain Murphy --  
 12 Q. Yes.  
 13 A. -- rob King and Amy Quirk.  
 14 Q. Would they not come to you and say, "Look boss,  
 15 we're introducing this thing called case  
 16 compliance. These are the things we're going to  
 17 ask for compliance with, one of them is we  
 18 require a particular font and line spacing", and  
 19 you say to them, "Well, hold on that's a bit  
 20 petty", or "That's a good idea, I like  
 21 everything to be produced in the same font";  
 22 would they not come to you with things like  
 23 that?  
 24 A. No, that's not the level of detail that I would  
 25 be involved in.

118

1 them about so he can decide whether anyone  
 2 should make a decision about whether that's  
 3 appropriate, all right?  
 4 THE WITNESS: Okay, thank you.  
 5 MR BEER: Thank you, sir. So 2.00, please.  
 6 SIR WYN WILLIAMS: Yes.  
 7 (12.58 pm)  
 8 (The Short Adjournment)  
 9 (2.00 pm)  
 10 MR BEER: Sir, good afternoon, can you see and hear  
 11 me?  
 12 SIR WYN WILLIAMS: I can, thank you.  
 13 MR BEER: Thank you very much.  
 14 Mr Scott, can we turn please to our next  
 15 topic. I would like, if I may, to examine your  
 16 role in the genesis, creation and purpose of the  
 17 Ismay report of 2010. Can we start, please,  
 18 back in February 2010 by looking at FUJ00156120.  
 19 This is an email chain, so we're going to  
 20 have to start at the back which is at page 8,  
 21 please.  
 22 If we just scroll down a little bit, please,  
 23 and a bit more. We can see this is an email  
 24 from Carol Ballan, a contract advisor in South  
 25 East England area. Then scroll up, please, to

120

1 the top of the page. It's to Mandy Talbot,  
2 a lawyer within the Post Office, and others, Lin  
3 Norbury, Jessica Madron and Dominic Williams,  
4 and it's to do with a large debt outstanding in  
5 the Alresford branch, okay?

6 She says:

7 "Mandy, I am aware that there are many cases  
8 at the moment, both current and  
9 [ex-postmasters], where there are challenges  
10 regarding the integrity of the Horizon system."

11 Just stopping there at the moment, at that  
12 time, were you aware of many cases in which the  
13 integrity of the Horizon system was being  
14 challenged, February 2010?

15 A. I was becoming aware because of the JFSA but  
16 I wasn't aware of explicit examples.

17 Q. We're going to see in a moment that you're  
18 copied in to this chain?

19 A. Mm-hm.

20 Q. Okay. But you say you were aware because of the  
21 JFSA. What were you aware of because of the  
22 JFSA?

23 A. They'd just been set up.

24 Q. What did that tell you or what did you learn  
25 from the setting up of the JFSA?

121

1 to her solicitors."

2 Then can we go, please, to page 7 and look  
3 at the foot of the page. We can see this is  
4 an email, if we just scroll on, from Mandy  
5 Talbot on to David X Smith, who was the Head of  
6 Change & IS and she says to him:

7 "Has [the Post Office] received requests  
8 like this before and if so how has it responded  
9 to them? Does the business in principle have  
10 any objection to meeting with a 'computer  
11 expert' and explaining to him how the system  
12 works. Possibly even showing him the data. It  
13 may be beneficial in resolving this case but it  
14 will set a precedent. If we refuse I anticipate  
15 there is no way that we will be able to recoup  
16 any money on the sale of the branch without  
17 litigation which will revolve around computer  
18 evidence. I have looked up Vella who appears to  
19 be featured on a number of websites as  
20 a computer expert but what his experience is in  
21 the field is impossible to tell. Your opinion  
22 would be really useful to us in advising the  
23 business how it should respond to the request  
24 against the background of attacks on Horizon in  
25 the press and Courts."

123

1 A. That there were challenges around the Horizon  
2 integrity.

3 Q. Had you seen an article in *Computer Weekly* in  
4 2009?

5 A. I've seen it in the bundle. I don't recollect  
6 it but I may have seen it.

7 Q. Were you aware of some coverage by the BBC in  
8 2009/10 over Horizon integrity problems?

9 A. I don't recall that.

10 Q. In any event, this contract advisor for South  
11 East England, or one of them, is aware of many  
12 cases where there are challenges regarding the  
13 integrity of Horizon.

14 Then in the next three or four paragraphs  
15 she sets out some background to the case in  
16 particular, okay, which we needn't read.  
17 Essentially, there was a debt and she wants some  
18 advice, please, from Mandy Talbot, the lawyer,  
19 about how to handle it. It seems like there  
20 must have been an attachment to it, which we  
21 haven't got, concerning a request for access for  
22 the purposes of an examination by an expert  
23 witness.

24 She says at the end, Ms Ballan:

25 "Please can I have your advice on a response

122

1 So we've got somebody in the southeast of  
2 England asking for advice on a particular  
3 branch, it being routed by Mandy Talbot to David  
4 Smith.

5 Then if we can look, please, at his reply.  
6 We can see it's signed off at the end of the  
7 page there. We actually have to go to page 5,  
8 the foot of the page at page 5:

9 "Mandy,

10 "Forgive me if this is a rather long  
11 response but it's important given my impending  
12 departure from the Post Office that my logic is  
13 fully understood after I'm no longer around to  
14 ask.

15 "I've been embroiled in the various  
16 newspaper, TV and flag case letters all claiming  
17 that Horizon is at fault. As yet I haven't seen  
18 a single shred of evidence to back up ... these  
19 claims. However, a recent meeting with MPs  
20 encapsulated the issue we face very nicely.  
21 People know that computer systems go wrong from  
22 time to time, particularly government computer  
23 systems, and, therefore, believe that a computer  
24 system such as Horizon could have caused these  
25 discrepancies. As long as the argument is

124

1 carried out on the level of what could happen  
2 then we will always struggle to win it. Our  
3 greatest chance of winning the argument case by  
4 case is to fix the debate on what actually  
5 happened.

6 "Two cases of which I believe you are  
7 familiar further reinforce this view and shape  
8 my response to your question. In the case  
9 referred to as Cleveleys an independent expert  
10 was appointed. Unfortunately [the Post Office]  
11 and Fujitsu did not manage this spectacularly  
12 well and probably fielded the wrong people or at  
13 the very least insufficiently briefed people.  
14 I read the so-called experts report and I have  
15 to say it was far from the professional effort  
16 I would have expected. There was no sign of  
17 a systematic approach to evidence gathering or  
18 that the expert had gained essential knowledge  
19 of how Horizon enables accounting integrity to  
20 be maintained. The expert concluded that  
21 Horizon could have created discrepancies.  
22 Crucially the audit logs which would have proven  
23 what did happen on the system had not been  
24 retained. We settled out of court. This matter  
25 was determined on what could have happened."

125

1 down:

2 "In the case of Castleton we were able to  
3 disclose the audit log. My recollection is that  
4 Castleton's solicitor, or an expert retained by  
5 the solicitor, examined the log and concluded  
6 that Horizon did not cause the discrepancy.  
7 I seem to remember that Castleton fired this  
8 solicitor and decided to continue with his  
9 counterclaim. He lost! Having heard  
10 Castleton's arguments, the Judge decided that  
11 there was 'no flaw' in the Horizon system, and  
12 that 'the logic of the system is correct': he  
13 said 'the conclusion is inescapable that the  
14 Horizon system was working properly in all  
15 material [respects '. We won the case on the  
16 basis of what had actually happened."

17 Never mind for a moment whether that is in  
18 any way an accurate summary of what actually  
19 happened, that you heard of the *Castleton* case  
20 before now, 2010?

21 **A.** No, I don't recall it, no.

22 **Q.** He, Mr Smith, continues:

23 "I believe that we should therefore allow  
24 an expert to examine in the audit log having  
25 been fully briefed on how Horizon maintained

127

1 Stopping there, the reference to the  
2 Cleveleys case, when did you first become aware  
3 of the Cleveleys case?

4 **A.** I don't recall it. I think -- no, just don't  
5 recall it.

6 **Q.** So, in due course, we will see you got this  
7 email chain?

8 **A.** Yeah.

9 **Q.** So you will have been aware of it, at least by  
10 February 2010 --

11 **A.** Okay.

12 **Q.** -- ie that description of it?

13 **A.** I don't remember even seeing this in my bundle  
14 so ...

15 **Q.** Okay, well, if we go forwards to page 4, we can  
16 see an email that you sent on this chain; can  
17 you see that?

18 **A.** Yes.

19 **Q.** From you to Sue Lowther --

20 **A.** Yes.

21 **Q.** -- and when we get to the top of the chain we'll  
22 see more correspondence from you?

23 **A.** Okay.

24 **Q.** Going back, please, I think we were on  
25 Mr Smith's long reply, on page 6. If we scroll

126

1 integrity as this gives us the best chance of  
2 winning the argument. However we need to do so  
3 in a controlled manner and I suggest the  
4 following way forward.

5 "1. It is not clear whether we have  
6 examined the audit log for this branch over the  
7 period during which the discrepancies occurred.  
8 If not we should do so. It would also be useful  
9 to understand the details of the investigation  
10 including a statement from [Product and Branch  
11 Accounting] as to whether it is possible that  
12 there are outstanding transaction corrections.

13 "2. Horizon is a very complex system. We  
14 should ensure that the experience of the expert  
15 equips him to carry out the task. Being a bit  
16 of a whiz on a PC wouldn't make the guy  
17 an expert -- I'd expect a background in the  
18 technical detail of say large scale banking  
19 system as the experience that would equip  
20 someone to carry out this task. This is not  
21 just in our interest it is also in the interest  
22 of the subpostmistress.

23 "3. We should control the process. Firstly  
24 whoever faces off to the expert -- and I'd  
25 suggest a combined Post Office/Fujitsu effort --

128



1 should have first immersed themselves in what we  
 2 discover from 1 so that they can prepare their  
 3 explanation in the light of what we know.  
 4 Secondly we should set out how Horizon maintains  
 5 integrity and illustrate how this is ensured and  
 6 explain how the audit log demonstrates this  
 7 integrity. Then and only then should we hand  
 8 over the audit log. Finally we should ensure  
 9 that the expert has an open channel to our  
 10 experts to follow up any queries. Finally, and  
 11 we possibly can't insist on this, we should try  
 12 to get the opportunity to comment on any report  
 13 that is drafted before it is finalised."

14 So, overall, Mr Smith was saying, would you  
 15 agree, in summary, that he was keen to ensure  
 16 that the expert has got to be the "right  
 17 expert", he has got to understand the processes  
 18 which protect the integrity of the Horizon  
 19 system and he points to the *Castleton* case to  
 20 support his approach?

21 **A.** Yes.

22 **Q.** Can we go, please, to page 5. We can see, if we  
 23 just scroll down a little bit, it's Mandy  
 24 Talbot's email. Then scroll back up again. She  
 25 replies:

129

1 **Q.** Therefore, if you read this, you wouldn't see  
 2 anything wrong in getting somebody who was  
 3 themselves robust so that they could rebut  
 4 anything that an independent expert might throw  
 5 at them?

6 **A.** I mean, clearly that's what Dave Smith is  
 7 recommending.

8 **Q.** I'm sorry, I missed that.

9 **A.** That's clearly what Dave Smith is recommending.

10 **Q.** Yes. You wouldn't see anything wrong in that?

11 **A.** No.

12 **Q.** She continues:

13 "Ultimately given the complexity of the  
 14 Horizon system are there any external  
 15 individuals or firms who you can recommend who  
 16 would have the appropriate background to create  
 17 a proper report in case POL has to defend  
 18 itself?"

19 Then the reply, please, on page 4, at the  
 20 foot of the page, David Smith replies:

21 "I'm on holiday in Mexico ...

22 "John and Rod have individuals who access  
 23 the audit log via Fujitsu."

24 If we scroll up, we can see this is when  
 25 you're copied into the email. Can you see?

131

1 "Dave

2 "[Thanks] for the comprehensive reply.

3 "Who do you suggest we go to within the

4 business and Fujitsu to obtain the full audit

5 logs ... sorry that you're going to be leaving

6 us, can you suggest who we should talk to about

7 Horizon issues after you are gone ...

8 "I agree that once we get everything we can

9 together it should be examined by POL and

10 Fujitsu -- again can you suggest some useful

11 candidates who are expert but also quite robust

12 so as to be capable of rebutting anything that

13 the subpostmistress's expert can throw at us."

14 Just stopping there, would that have been

15 the prevailing attitude, on your understanding

16 at the time, that the imperative was to be

17 robust and rebut anything that suggested that

18 Horizon lacked integrity?

19 **A.** I don't recall that.

20 **Q.** What was the prevailing attitude at the time:

21 one of openness to the possibility that there

22 might be Horizon flaws?

23 **A.** No, I think the feedback from the business and

24 from people like Dave Smith was that the Horizon

25 system was robust and reliable.

130

1 **A.** Yes.

2 **Q.** So you entered the chain at this point. What  
 3 individuals did you have who accessed the audit  
 4 log at Fujitsu?

5 **A.** The team didn't access directly to Fujitsu; they  
 6 made requests for records.

7 **Q.** What part of the Security team that you led did  
 8 that?

9 **A.** That would be the Fraud strand, which then moved  
 10 into the Security Operations strand.

11 **Q.** Were there any written instructions that you  
 12 were aware of that told them how to do it and  
 13 what to request?

14 **A.** In the early years, I can't recall but, clearly,  
 15 I've seen in the bundle that there was  
 16 a procedure written up later on. I think 2013.

17 **Q.** In late 2013?

18 **A.** Sorry in the late tenure or in the late part of  
 19 my tenure in 2013.

20 **Q.** Was that written up almost at the same time that  
 21 the Post Office stopped prosecuting?

22 **A.** Well, that would be about the same time, yes.

23 **Q.** So what about such a protocol for the period of  
 24 time that the Post Office was prosecuting, were  
 25 you aware of anything?

132

1 A. No.

2 Q. Was there a menu of material that the people who  
3 had the function of obtaining the material from  
4 Fujitsu could look at to determine what they  
5 should seek?

6 A. I have no knowledge of that sort of level of  
7 operation at all.

8 Q. Or what was available?

9 A. I have no knowledge. I just didn't know that  
10 type of information at the operational level.

11 Q. Mr Smith continues:  
12 "Within Fujitsu I believe Gareth Jenkins is  
13 the individual best to interpret the audit log  
14 but also explain how Horizon is set up to  
15 maintain integrity both in normal running and  
16 when failures occur. Rod would have to field  
17 someone to explain the back office controls we  
18 have. I will contact Fujitsu to make sure that  
19 Gareth or a suitably qualified alternative is in  
20 place.  
21 I would suggest that one of the big  
22 accounting firms would be the best bet for  
23 an expert report. They have system experts.  
24 This is likely to be quite expensive as Horizon  
25 underwent very frequent change."

133

1 report to me. I can't remember the team members  
2 underneath.

3 Q. What function did Information Security perform?

4 A. They provided the policies, standards and  
5 oversight and assurance of the IT within the  
6 business.

7 Q. Were they responsible in any way for the  
8 obtaining or the extraction of data?

9 A. No, I don't believe they were. But they may  
10 have -- I don't know. I'd have to say not for  
11 investigations.

12 Q. If we go further up the page, a reply comes  
13 back:  
14 "John,  
15 "More likely to be Dave Posnett that will be  
16 of assistance to Mandy."  
17 Then scroll up a little bit further. You  
18 then forward the chain to Dave Posnett:  
19 "... if you can support and assist Mandy ...  
20 in the issue described, I'll leave you to get  
21 engaged with those involved."  
22 So you are farming that out to Mr Posnett,  
23 essentially?  
24 A. Yes. Delegating, yes.  
25 Q. Then further up the page, please. Mr Posnett

135

1 Scrolling up the page, please. You yourself  
2 forward the chain on to Sue Lowther; do you see  
3 that?

4 A. Yes.

5 Q. You say:  
6 "Can you please support and advise Mandy &  
7 Co in this exercise and provide some initial  
8 thoughts.  
9 "... Sue leads on Information Security for  
10 [the Post Office]."  
11 What function did Sue Lowther then perform  
12 in February 2010?

13 A. I don't know, I can't recall.

14 Q. Was she within your report?

15 A. I believe at that time, yes.

16 Q. Was there an element of your Department that  
17 had, as its responsibility, information  
18 security?

19 A. Yes, that was led by Sue Lowther.

20 Q. How many people were in the Information Security  
21 Department?

22 A. I think there were about three or four permanent  
23 and couple of contractors.

24 Q. Can you recall the names of any of them?

25 A. Sue Lowther -- no, Sue Lowther was a direct

134

1 replies:  
2 "Mandy,  
3 "For info as discussed."  
4 Essentially seeking information.  
5 Scroll down, please, and scroll down again.  
6 He says:  
7 "Once I have [that information], I'll look  
8 to arrange a [conference] call ..."  
9 Do you know what happened to the discussion  
10 over the appointment of an independent expert  
11 from one of the big accountancy firms, for  
12 example, or consulting firms who had systems and  
13 IT experts within them to undertake a review?

14 A. No, I can't recall.

15 Q. Is that because you delegated this to Mr Posnett  
16 and that was the end of it?

17 A. That may be a potential but, again, I can't  
18 recall.

19 Q. Can we move forward in the tale to POL00119858.  
20 Can you see an email, if you look at the foot of  
21 the page, from Mr Ismay, the head of Product and  
22 Branch Accounting, to you and Mandy Talbot --  
23 can you see that --

24 A. Yes.

25 Q. -- dated 24 February? So shortly after the

136

1 email chain that we've just looked at. Would  
2 you agree that this is a discussion at quite  
3 a high level within -- or quite a senior level  
4 within the Post Office, head of P&BA and Head of  
5 Security?

6 **A.** Yes, we're obviously heads of our own  
7 departments.

8 **Q.** At this time, what would your understanding of  
9 Mandy Talbot's role be in relation to the  
10 Horizon challenges?

11 **A.** I don't recall. I don't particularly recall  
12 Mandy Talbot, to be honest.

13 **Q.** In any event, Mr Ismay says to the pair of you:

14 "Further to your emails with Dave ..."

15 I think that might be a cross-reference to  
16 the Dave Posnett emails that we've just seen,  
17 which is why I showed them to you:

18 "I think we do need to get some independent  
19 heavyweight assurance to rebut the challenges.

20 "Dave's outline made sense.

21 "He suggested one of the big accounting  
22 firms. I actually received a 'cold call'  
23 proposal from Deloitte recently for exactly  
24 that work after they read the articles about  
25 Horizon in *Accountancy Age Magazine*."

137

1 "I think we ... need to understand what  
2 cases are under way in this area."

3 Then scrolling down:

4 "I found out that Carol Cross in my team and  
5 Jon Longman from yours ... are in court soon for  
6 West Byfleet (or West Byfield). This ... is  
7 an office who as part of their defence is  
8 challenging the integrity of Horizon. I didn't  
9 know if you were involved Mandy? I think we  
10 need to be clear about all live cases so we can  
11 ensure the same consistent robust response  
12 throughout and based on the sensible principles  
13 of Dave's emails about pinning down the exact  
14 transaction logs and talking about facts not  
15 speculation."

16 So would you agree that this email is  
17 starting up a conversation about two things: the  
18 benefit of an independent review and how to take  
19 that forwards, and, separately, the  
20 recommendations made by Mr Smith, Dave Smith,  
21 for an approach to investigations to support the  
22 Post Office's position in challenges to Horizon.

23 **A.** Yes.

24 **Q.** The message from Mr Ismay here is suggesting  
25 that he push forward the conversation about

139

1 Can you recall the articles in *Accountancy*  
2 *Age Magazine*?

3 **A.** No, not in an accountancy magazine, no.

4 **Q.** When you get an email like this, what would you  
5 do? There's somebody referring to articles  
6 about the Horizon system in a publication that  
7 you maybe don't subscribe to, what would you do?  
8 Would you think "I'd better find out what that  
9 is"?

10 **A.** I can't recall, if it's an accountancy magazine,  
11 I probably wouldn't have access. You may speak  
12 to Rod who does access but I just can't recall.

13 **Q.** In any event, he says:

14 "Deloitte are engaged with Group Audit  
15 already in a set price framework agreement.

16 I think we should consider them. I shall speak  
17 to them in a 'no commitments' sense. Given the  
18 existing framework deal I don't know if we could  
19 just use them (if they fitted the bill) or  
20 whether we have another preferred supplier or  
21 whether we need more of a 'tender'. The  
22 other obvious candidates are our auditors [Ernst  
23 & Young] plus KPMG and PwC.

24 "I think it would be worth us having a 3 way  
25 call. Looks like you are in workshops ...

138

1 an independent audit or review with Deloitte in  
2 the first instance?

3 **A.** Yes.

4 **Q.** Occupying the senior position that you did, was  
5 that a decision that Mr Ismay could take himself  
6 or would it need to go off to the board or some  
7 other decision-making body for approval?

8 **A.** I suspect it would have to go off to somewhere  
9 else.

10 **Q.** The someone else being what or who?

11 **A.** I'd expect it to be the Executive Committee at  
12 that level, or higher, the board.

13 **Q.** So the Executive Committee or the board. What  
14 was your role in this? Did you need to agree to  
15 or authorise his proposal to go off and get  
16 an expert report on Horizon from an external  
17 body?

18 **A.** No.

19 **Q.** Could you have shut it down? Could you have  
20 said, "Hold on, stop"?

21 **A.** No.

22 **Q.** We see in the email, in the last paragraph,  
23 Mr Ismay saying that "We need to understand what  
24 cases are under way in this area". At this  
25 time, by February 2010, was there no tracking

140

1 mechanism within the Post Office, whether within  
 2 security or more widely, that monitored the  
 3 number and nature of challenges to Horizon?  
 4 **A.** Not that I can recall, no.  
 5 **Q.** Is the October 2013 protocol the first attempt  
 6 at such a mechanism, to your knowledge?  
 7 **A.** To my knowledge, yes.  
 8 **Q.** Can you recall what you did as a result of this  
 9 email?  
 10 **A.** No, I can't recall.  
 11 **Q.** Can you recall whether the three-way call that  
 12 he suggests happened?  
 13 **A.** No, I can't recall that.  
 14 **Q.** Therefore, you can't recall what was discussed?  
 15 **A.** No.  
 16 **Q.** Can you recall what happened next?  
 17 **A.** No.  
 18 **Q.** Can you recall whether there was any discussion  
 19 with Fujitsu or involving Fujitsu at this stage?  
 20 **A.** No, I can't recall.  
 21 **Q.** Can we turn forwards then again, please, to  
 22 POL00054371. If we look, please, at page 3, at  
 23 the foot of page 3, the start of this chain on  
 24 25 February is an email from Andrew Daley to  
 25 Jason Collins and Graham Brander, blind copied  
 141

1 behalf of Security", which I think is consistent  
 2 with the email we saw right at the beginning but  
 3 inconsistent with then Mr Smith saying is that  
 4 Dave Posnett might be the better option:  
 5 "Please also send Sue any additional  
 6 documents or reports pertinent to the specific  
 7 cases (ie Jason the forensic report from  
 8 John L's case).  
 9 "... bullet points will suffice, if more is  
 10 needed we can supply ..."  
 11 Then further up the page, Graham Brander  
 12 replies:  
 13 "I'm aware of two ongoing cases at West  
 14 Byfleet (Jon Longman) & Orford Road (Lisa Allen)  
 15 and also some historical cases ... but as FIs  
 16 ..."  
 17 Is that Financial Investigators?  
 18 **A.** I presume so, yes.  
 19 **Q.** "... we wouldn't have Horizon disputed cases  
 20 other than those report by the Investigators,  
 21 who will have far more details on the issues  
 22 than us.  
 23 "I've attached an article from an IT  
 24 magazine which may have brought this issue to  
 25 the fore in the 1st place and which may of  
 143

1 to Andy Hayward; can you see that?  
 2 **A.** Yes.  
 3 **Q.** "Andy [I think that's Andy Hayward in context]  
 4 called me yesterday and asked whether you guys  
 5 ... could put together some stats on these cases  
 6 ..."  
 7 Remembering that the subject of the email  
 8 was "Horizon disputed cases":  
 9 "... where the accused's defence was/is that  
 10 the Horizon data is unreliable for any amount of  
 11 reasons given by the accused.  
 12 "This should be sent to Iain within the next  
 13 few days. [He] will need as much information as  
 14 possible."  
 15 Again, does it follow that, by this time,  
 16 February 2010, there was no central repository  
 17 of issues that subpostmasters had raised with  
 18 the integrity of Horizon data?  
 19 **A.** Not that I can recall.  
 20 **Q.** If we go back to the third page, please. We see  
 21 the reply:  
 22 "Andrew,  
 23 "Thanks for this ...  
 24 "When completed can you also [forward]  
 25 details to Sue Lowther as she is leading on  
 142

1 interest to Ian."  
 2 Then page 2, please. At the foot of the  
 3 page, we see this chain being sent to you:  
 4 "All,  
 5 "Further to our discussion earlier today,  
 6 additional information in the attached pdf  
 7 article below [which I think is the IT magazine  
 8 that's referred to]. As part of the wider  
 9 review it may well be worthwhile understanding  
 10 the 'outcome' of each of the case studies  
 11 referenced, where applicable (ie criminal/civil)  
 12 and that may assist ..."  
 13 Further up the page -- a little bit further  
 14 please -- you're copied in on this email of  
 15 8 March 2010:  
 16 "As was discussed on the conference call and  
 17 taking into account Rob's comments, to confirm  
 18 what we're looking at is a 'general' due  
 19 diligence exercise on the integrity of Horizon,  
 20 to confirm our belief in the robustness of the  
 21 system and thus rebut any challenges."  
 22 Can you recall discussion at this time about  
 23 the need to seek a general due diligence  
 24 exercise, the purpose of which was to confirm  
 25 the Post Office's belief in the robustness of  
 144

1 the Horizon system?  
 2 **A.** No, I don't recall.  
 3 **Q.** Wouldn't you think the better question would be,  
 4 "We're looking for a due diligence exercise on  
 5 the integrity of Horizon to see whether it is  
 6 robust or not" --  
 7 **A.** Yes.  
 8 **Q.** -- rather than, "to confirm our pre-existing  
 9 beliefs"?  
 10 **A.** Yes.  
 11 **Q.** "The information Security team have looked at  
 12 the information that has been forwarded to them  
 13 re the above and it seems that the issues raised  
 14 are mainly around procedural items and about  
 15 'Accounting' reconciliation."  
 16 Then there are some requests. Then over to  
 17 the first page, please -- scroll up, please,  
 18 a little bit more -- to Mr King's email:  
 19 "Rob  
 20 "Thanks for your time earlier."  
 21 He copies in Rob Wilson, the Head of  
 22 Criminal Law in the Post Office:  
 23 "As discussed, I can confirm we are in no  
 24 way questioning/investigating the financial  
 25 integrity of Horizon, or of the accounting

145

1 **A.** I can't recall. I don't -- I can't recall it  
 2 being like that, but no.  
 3 **Q.** If everyone did have an open mind, wouldn't we  
 4 see that written across these pages that I keep  
 5 showing you?  
 6 **A.** Yes, I'd say so.  
 7 **Q.** Does its absence from any of the pages that  
 8 we're going to look at and that we have looked  
 9 at mean that there wasn't that open mind to the  
 10 possibility of Horizon lacking integrity?  
 11 **A.** I don't recall it as that being at the time but,  
 12 clearly, with hindsight, it shows a different  
 13 picture.  
 14 **Q.** Why does it take hindsight? I'm asking you  
 15 about contemporaneous material that all seems to  
 16 point in one direction: a group of people  
 17 looking to stand the system up, not a group of  
 18 people with open minds looking genuinely to  
 19 enquire whether their system works or not. It  
 20 doesn't take hindsight. This is just  
 21 a reflection of the values of the day, isn't it,  
 22 Mr Scott?  
 23 **A.** It's not what I recall, no.  
 24 **Q.** At this time, that's late February 2010, what  
 25 did you know about bugs, errors or defects in

147

1 system as a whole."  
 2 Can you help us how Mr King came to the view  
 3 that an independent expert report into the  
 4 integrity of the Horizon system would be in no  
 5 way questioning or investigating the financial  
 6 integrity of Horizon?  
 7 **A.** No, I can't comment on what Dave King was  
 8 thinking.  
 9 **Q.** Isn't this redolent of a mindset within the Post  
 10 Office at this time that "We're not actually  
 11 looking to find out whether there is something  
 12 wrong with the system, we only want to hear that  
 13 there's nothing wrong with the system"?  
 14 **A.** That's not how I recall it, no.  
 15 **Q.** But why don't we see in a single email it put in  
 16 that rather neutral and open way? Why are all  
 17 of the emails written "We want a report that  
 18 will confirm our existing beliefs that it's  
 19 robust, we're not going to question or  
 20 investigate the integrity of Horizon"? Why are  
 21 they all written the wrong way round?  
 22 **A.** I can't explain that.  
 23 **Q.** Well, is it because -- is this the simple truth:  
 24 that they accurately reflect the mindset of the  
 25 day?

146

1 Legacy Horizon, the old Horizon before it became  
 2 Horizon Online?  
 3 **A.** I wasn't aware of any bugs, issues or defects  
 4 that impacted investigations.  
 5 **Q.** Would you agree that, if there were bugs, errors  
 6 and defects in Horizon, in particular if they  
 7 affected the integrity and reliability of the  
 8 financial data produced by Horizon, you should  
 9 have been aware of them?  
 10 **A.** Yes.  
 11 **Q.** Were you actually keen to find such information  
 12 or did you close your eyes to it?  
 13 **A.** No, I would always be open to understand whether  
 14 there's any issues with it and whether anything  
 15 needed to be examined.  
 16 **Q.** By this time, it seems, from the email exchange,  
 17 there would be a sufficient number of Horizon  
 18 disputed cases to be able to compile statistics  
 19 of them. So a number of them, yes?  
 20 **A.** (*The witness nodded*)  
 21 **Q.** If that were the case, why had no effort been  
 22 made previously to compile a clear picture of  
 23 how often and why the system was challenged by  
 24 accused subpostmasters?  
 25 **A.** I can't explain why it wasn't.

148

1 Q. Again, is that because the principle that  
 2 operated was 'least said soonest mended'?

3 A. No.

4 Q. Can we turn, please, to POL00106867. Can we  
 5 start with page 3, please.

6 Just give me a moment to catch up with my  
 7 hard copy papers.

8 If we scroll down, please. We can see  
 9 a message from Mr Hayward to a number of senior  
 10 people at the Post Office, including Rod Ismay,  
 11 David X Smith and you.

12 A. Yes, I'm cc'd in.

13 Q. Can you help us with some of the others on this  
 14 distribution list: Rebekah Mantle?

15 A. No.

16 Q. Iain Murphy?

17 A. He was a Senior Security Manager Head of Fraud  
 18 at the time, I believe.

19 Q. So within your area of responsibility, within  
 20 your Department?

21 A. Yeah.

22 Q. So we can see this is sent at 5.01 on  
 23 26 February and this is after the previous  
 24 message that we had seen Mr Ismay had sent to  
 25 you and Mandy Talbot, suggesting Deloitte as  
 149

1 limited to about 2007/2008 to 2010 --

2 A. No, I don't recall.

3 Q. -- rather than going back to when the  
 4 prosecutions commenced in 2000, in reliance on  
 5 Horizon?

6 A. No, I don't recall.

7 Q. Presumably -- I mean we will see in a moment  
 8 your contributions to this chain -- you didn't  
 9 say at the time "Hold on, haven't we been  
 10 prosecuting for 10 years on the basis of  
 11 Horizon? Why are we only looking at two to  
 12 three years?" Why not?

13 A. I don't recall why.

14 Q. He continues in paragraph 3:  
 15 "Subject to agreement of 2 above, conduct  
 16 full investigations into integrity issues, with  
 17 conclusions/report provided. Once investigated  
 18 and conclusions drawn, gain external  
 19 verification to give a level of 'external  
 20 gravitas' to the response to these challenges  
 21 (recommend Ernst & Young as most suitable  
 22 partner to complete this ... [to be advised])."  
 23 So this was setting out a plan to  
 24 investigate the challenges to Horizon integrity,  
 25 yes?

151

1 a possibility, yes?

2 He says:

3 "Following our conference call today, below  
 4 is a brief summary of the agreed key activities  
 5 to progress the next steps on relations to the  
 6 above piece of work ..."

7 The heading is "Challenges to Horizon":  
 8 "AH & MT ..."

9 Can you help us with who "AH" might be in  
 10 that context: him, Andy Haywood?

11 A. Yes.

12 Q. "... [and Mandy Talbot] to provide SL/DK ..."  
 13 "SL"?

14 A. I will make a presumption that's Sue Lowther.

15 Q. "DK"?

16 A. Dave King.

17 Q. "... with information on past and present cases  
 18 with reference to the Horizon Challenges,  
 19 (Criminal & Civil cases).  
 20 "(Note: I have asked the fraud team to  
 21 review [approximately] the past 2-3 years case  
 22 file although these challenges are of a more  
 23 recent nature)."  
 24 Do you know why the review was to be of the  
 25 past two to 3 years of case files, ie why it was  
 150

1 A. Yes.

2 Q. First, the investigation was going to be  
 3 an external one, yes, that was the plan?

4 A. Yes.

5 Q. It was going to reach conclusions, yes, and only  
 6 then was there to be an independent review by  
 7 someone outside the organisation, potentially  
 8 Ernst & Young.

9 The witness was nodding, rather than giving  
 10 an oral verbal answer.

11 Can you, when you wish to give a non-verbal  
 12 communication -- ie shaking your head, nodding,  
 13 this morning you put your hands -- up explain  
 14 what you mean in words so the stenographer can  
 15 type them into the record, please.

16 Yes, so the question was: the independent  
 17 investigation was going to reach conclusions and  
 18 then it was going to be referred to an outside  
 19 organisation to "give a level of external  
 20 gravitas" to it?

21 A. Yes.

22 Q. It seems by this stage that Ernst & Young were  
 23 to be recommended as most suitable, and  
 24 Mr Ismay's suggestion earlier in the day that  
 25 Deloitte were going to be contacted has fallen  
 152

1 by the way side, hasn't it?  
 2 **A.** From this, it appears so.  
 3 **Q.** Was there sufficient concern within your team to  
 4 consider that the challenges to Horizon needed  
 5 to be explored, investigated and then  
 6 conclusions drawn?  
 7 **A.** I don't recall but there's indication here,  
 8 isn't there?  
 9 **Q.** And sufficient concern that any conclusions  
 10 should be accompanied by a level of external  
 11 oversight?  
 12 **A.** Yes.  
 13 **Q.** Given members of your team were acting as  
 14 Investigators in Horizon cases and as the  
 15 prosecuting authority for the Post Office, was  
 16 that something of a significant concern to you?  
 17 **A.** I can't recall.  
 18 **Q.** Well, help us. Looking at this now, do you  
 19 think it would be a significant concern to you?  
 20 **A.** Yes.  
 21 **Q.** It would be important to appreciate whether  
 22 there were or were not integrity issues with  
 23 Horizon --  
 24 **A.** Yes.  
 25 **Q.** -- both to appreciate whether you could continue

153

1 "Can we ensure that Rob Wilson (Head of  
 2 Criminal Law) is kept apprised of the situation  
 3 and included in any further meetings/updates ...  
 4 Our prosecution cases have faced an increase in  
 5 challenges as well as our civil cases, so the  
 6 activities outlined below, and indeed going  
 7 forward, are applicable to both Legal teams."  
 8 Then if we scroll up to the top of page 1,  
 9 please. We'll find an email -- thank you -- to  
 10 a number of people on the distribution list, but  
 11 you seem to have been excluded; can you see  
 12 that?  
 13 **A.** Yes, I think I was excluded on the one below.  
 14 **Q.** If we just scroll down, please. Yes, I think  
 15 you're right. Dave Posnett has cut you out.  
 16 Then if we go back to Mr Wilson's reply to Dave  
 17 Posnett of your team, he, Mr Wilson, says:  
 18 "If it is thought that there is a difficulty  
 19 with Horizon then clearly the action set out in  
 20 your memo is not only needed but imperative.  
 21 The consequence however will be that to commence  
 22 or to continue to proceed with any criminal  
 23 proceedings will be inappropriate. My  
 24 understanding is that the integrity of Horizon  
 25 data is sound and it is as a result of this that

155

1 with existing investigations and prosecutions --  
 2 agreed --  
 3 **A.** Yes.  
 4 **Q.** -- and to consider whether you may have any  
 5 duties in respect of cases where convictions had  
 6 already been secured?  
 7 **A.** Yes.  
 8 **Q.** Did that independent review ever happen?  
 9 **A.** As far as I recall, no.  
 10 **Q.** Did the internal investigation that has been  
 11 mentioned here in the way that's described here  
 12 ever happen?  
 13 **A.** I don't recall. I don't know whether it was  
 14 conducted or not and I wasn't aware.  
 15 **Q.** Are you aware of anyone intervening to prevent  
 16 it from happening?  
 17 **A.** No.  
 18 **Q.** Further up the page, please. We see here the  
 19 end of an email signed off by Dave Posnett, yes?  
 20 Then if we can go to the foot of page 1,  
 21 please, to miss out the blank page. We can see  
 22 at the foot of the page Dave Posnett, I think  
 23 same distribution list, but I think Rob Wilson  
 24 has been added now:  
 25 "All,

154

1 persistent challenges that have been made in  
 2 court have always failed. These challenges are  
 3 not new and have been with us since the  
 4 inception of Horizon as it has always been the  
 5 only way that Defendants are left to challenge  
 6 our evidence when they have stolen money or  
 7 where they need to show that our figures are not  
 8 correct.  
 9 "What is being suggested is an internal  
 10 investigation is conducted. Such  
 11 an investigation will be disclosable as  
 12 undermining evidence on the defence in the cases  
 13 proceeding through the criminal courts.  
 14 Inevitably the defence will argue that if we are  
 15 carrying out an investigation we clearly do not  
 16 have confidence in Horizon and therefore to  
 17 continue to prosecute will be an abuse of the  
 18 criminal process. Alternatively we could be  
 19 asked to stay the proceedings pending the  
 20 outcome of the investigation, if this were to be  
 21 adopted the resultant adverse publicity could  
 22 lead to massive difficulties for POL as it would  
 23 be seen by the press and media to vindicate the  
 24 current challenges. The potential impact  
 25 however is much wider for the Post Office in

156

1 that every office in the country will be seen to  
2 be operating a compromised system with untold  
3 damage to the Business. Our only real  
4 alternative to avoid the adverse publicity will  
5 be to offer no evidence on each of our criminal  
6 cases. This should mitigate some adverse  
7 publicity but is not a total guarantee.

8 "To continue prosecuting alleged offenders  
9 knowing that there is an ongoing investigation  
10 to determine the veracity of Horizon could also  
11 be detrimental to the reputation of my team. If  
12 we were to secure convictions in the knowledge  
13 that there was an investigation, where the  
14 investigation established a difficulty with the  
15 system we would be open to criticism and appeal  
16 to the Court of Appeal. The Court of Appeal  
17 will inevitable be highly critical of any  
18 prosecutor's decision to proceed against  
19 Defendants in the knowledge there could be  
20 an issue with the evidence.

21 "What we really need to do is impress on  
22 Fujitsu the importance of fully cooperating in  
23 the provision of technical expertise and witness  
24 statements to support the criminal and civil  
25 litigation now and in the future.

157

1 an external body for external gravitas.

2 You must have wanted to know what happened  
3 to those two proposals?

4 **A.** I can't recall.

5 **Q.** Did you not say, "Hold on, one moment, we were  
6 going to investigate the entire basis on which  
7 we prosecuted a whole cohort of people, some of  
8 whom have gone to prison, and the next minute  
9 we're not. What's happened between A and B?"

10 **A.** I'm sorry, I just can't recall what was  
11 happening.

12 **Q.** You were also responsible for Mr Posnett and  
13 Mr Hayward and Mr King, addressees to this  
14 email?

15 **A.** Yes.

16 **Q.** Did none of them come back to you and say,  
17 "Boss, the whole thing has had the brakes put on  
18 it because this lawyer has got involved and the  
19 lawyer, who is staggered that he wasn't included  
20 in an earlier meeting, is now saying 'We can't  
21 do this because it might generate adverse  
22 publicity to the organisation'"?

23 **A.** Sorry, I can't recall them coming to me to say  
24 that.

25 **Q.** Would you agree that, objectively, if there was

159

1 "Given the nature of the discussions that  
2 took place on [26 February] I am staggered I was  
3 not invited to take part in the conference."

4 Do you read this as Mr Wilson saying, "If  
5 there is a basis to investigate problems, we'd  
6 better get on and do it", or is he saying, "If  
7 we get on and investigate, we'll be in serious  
8 trouble if we do"?

9 **A.** It does come across like that, yes.

10 **Q.** The latter?

11 **A.** Yes.

12 **Q.** So he wasn't saying there's an imperative to  
13 investigate; he's saying, "We simply can't  
14 question Horizon because it's got all of these  
15 adverse consequences".

16 **A.** I think it's for Rob Wilson to give his  
17 interpretation of what he was trying to say.

18 **Q.** But, Mr Scott, you had been the subject of  
19 a number of discussions and email exchanges  
20 about the need to conduct an independent  
21 investigation --

22 **A.** Mm-hm.

23 **Q.** -- either by getting in external consultants or  
24 by the Post Office itself conducting an internal  
25 investigation and sending the conclusions to

158

1 any concern about the integrity of Horizon, the  
2 right thing to do was to conduct a full inquiry  
3 as an imperative?

4 **A.** Yes, if there was doubt over its integrity, yes.

5 **Q.** Had that been the plan of the senior team  
6 members involved in the earlier telephone  
7 conference until Mr Wilson's input?

8 **A.** That appears to be the case.

9 **Q.** Was the effect of Mr Wilson's input to shut down  
10 any internal or external substantive examination  
11 of the integrity of Horizon?

12 **A.** I can't recall this email because, obviously,  
13 I didn't see it so I don't know what the -- he  
14 was actually trying to achieve, whether he was  
15 actually trying to achieve that or not.

16 **Q.** But, Mr Scott, we've seen that you were involved  
17 in a number of discussions --

18 **A.** Yes.

19 **Q.** -- up until now that were on, if not train  
20 tracks, heading in a direction, and, as you've  
21 agreed, neither of the things ever happened.  
22 Were you not curious at the time why the two  
23 alternative plans were not seen through to  
24 completion?

25 **A.** No, sorry, I can't recall.

160



1 **Q.** Was there a concern, as expressed in this email  
 2 here, an overriding concern in the Post Office,  
 3 to avoid adverse publicity for the business?  
 4 **A.** I think all businesses want to avoid adverse  
 5 publicity.  
 6 **Q.** Did anyone mention what might be in the other  
 7 hand, "Adverse publicity, on the one hand, and,  
 8 on the other, we've prosecuted hundreds of  
 9 people, many of them have gone to prison. We  
 10 might have done so on the basis of data that  
 11 lacked integrity, let's weigh them up"?  
 12 **A.** I don't recall such conversations.  
 13 **Q.** Was there ever an 'other hand', a "Hold on,  
 14 there might just be a problem with the integrity  
 15 of Horizon here. People may have been convicted  
 16 on the basis of unsound data. We need to do  
 17 something about it"?  
 18 **A.** I can't recall. I'd expect the lawyers to have  
 19 shouted.  
 20 **Q.** The recipients of this email at least would have  
 21 been aware, because the email says so, that the  
 22 challenges to Horizon are not new and have been  
 23 with us since the inception of Horizon. Did you  
 24 know that: that the challenges to Horizon had  
 25 been there from the start, right back to 2000?

161

1 concerns from the outset, from the national  
 2 rollout in 1999 to 2000, that the EPOS system,  
 3 the Electronic Point of Sale system at the start  
 4 of Horizon, might require a rewrite or a design,  
 5 might that have impacted upon your confidence?  
 6 **A.** If I'd known that, then yes.  
 7 **Q.** If you'd been aware of a series of bugs, errors  
 8 or defects being identified in Horizon,  
 9 including some which could impact upon  
 10 discrepancies and balancing, would that have  
 11 impacted upon your confidence in Horizon?  
 12 **A.** If I'd known, yes.  
 13 **Q.** Can we turn forwards, please, to POL00120479.  
 14 Now, if we look at the foot of the page first,  
 15 we can see Mr Ismay distributing a document  
 16 called "Horizon Challenges -- draft report", and  
 17 you're not included on that?  
 18 **A.** Yes.  
 19 **Q.** If we go up, please, and a bit more, we can see  
 20 Mr Ismay sending it to a wider collection of  
 21 people, including Mandy Talbot, Rob Wilson and  
 22 Sue Lowther. Was anyone in that list within  
 23 your Department?  
 24 **A.** Yes.  
 25 **Q.** Other than Sue Lowther?

163

1 **A.** I don't recall that.  
 2 **Q.** When you became Head of Security, did anyone  
 3 brief you to say, "Look, Boss, we prosecute  
 4 people on the basis of data that's produced by  
 5 this system called Horizon. For the past seven  
 6 years there have been a myriad of complaints  
 7 about the reliability of the data it produces"?  
 8 **A.** I don't recall that.  
 9 **MR BEER:** Sir, I wonder if that's an appropriate  
 10 moment to take the afternoon break.  
 11 **SIR WYN WILLIAMS:** Yes, by all means.  
 12 **MR BEER:** So 3.15, please.  
 13 **SIR WYN WILLIAMS:** Very well.  
 14 **MR BEER:** Thank you very much.  
 15 **(2.58 pm)**  
 16 **(A short break)**  
 17 **(3.15 pm)**  
 18 **MR BEER:** Good afternoon, sir. Can you see and hear  
 19 me?  
 20 **SIR WYN WILLIAMS:** Yes, I can thank you.  
 21 **MR BEER:** Mr Scott, we've seen a series of emails in  
 22 which various members of the Post Office  
 23 expressed their confidence in the integrity of  
 24 Horizon and the data produced by it. If you had  
 25 been aware, by 2010, that Fujitsu had got

162

1 **A.** Yes.  
 2 **Q.** Who else?  
 3 **A.** Dave Pardoe.  
 4 **Q.** Yes, of course. Thank you. Anyone else?  
 5 **A.** No.  
 6 **Q.** He, Mr Ismay, says:  
 7 "Dear all -- Latest version incorporating,  
 8 as best I can manage, all the input you have  
 9 made."  
 10 Did you know, in mid-2010, that members of  
 11 your Department were providing input into  
 12 a report written by Rod Ismay about Horizon  
 13 challenges?  
 14 **A.** Sorry, I can't recall whether I did.  
 15 **Q.** He says:  
 16 "Thanks for your time and comments in the  
 17 last couple of days.  
 18 "This is a complex area and I would value  
 19 any further comments you have, but realistically  
 20 [they] have to be by lunch tomorrow [et cetera].  
 21 "Regardless of how this document is  
 22 finalised, there are number of improvement  
 23 points which we will need to work on together  
 24 ..."  
 25 Then this:

164

1 "The priority should probably be to provide  
2 any input considered appropriate for closing  
3 down the issues that cause Channel 4 to consider  
4 this a news item. Also to ensure we're prepared  
5 for the next court cases."

6 Now, you're not included on this email but  
7 want to ask you about that last paragraph and  
8 the sentiments included in it. Did that reflect  
9 the prevailing mood in the senior levels of the  
10 Post Office at the time, that the priority was  
11 to close down any issues that the media  
12 considered to be newsworthy?

13 **A.** On the basis that everyone was being told that  
14 the system was robust and reliable, I guess that  
15 was one of the areas that they were looking at.

16 **Q.** What investigation had taken place to establish  
17 whether or not the system was reliable?

18 **A.** I don't know.

19 **Q.** How were people allowed to convince themselves  
20 that the system was reliable, if  
21 an investigation hadn't taken place?

22 **A.** Sorry, I don't know.

23 **Q.** But, again, did this, what we see written here,  
24 to a wide range of people including members of  
25 your Department, reflect the culture and values

165

1 **A.** I can't recall that.

2 **Q.** Have you seen any email where anyone raised that  
3 point, "Our priority should be our postmasters,  
4 and whether any innocent men and women have been  
5 sent to prison"?

6 **A.** Sorry, I just can't recall that.

7 **Q.** Can we move forward to the Ismay report itself,  
8 2 August 2010, POL00029475. This is a copy of  
9 the Ismay report itself and we can see it's  
10 dated 2 August, and you'll see that you're  
11 a named recipient of it?

12 **A.** Yes.

13 **Q.** Can we go forwards, please, to page 19 and look  
14 at the bottom half of the page, "Independent  
15 Review and Audit Angles", Mr Ismay says:

16 "[The Post Office] has actively considered  
17 the merits of an independent review. This has  
18 been purely from the perspective that we believe  
19 in Horizon but that a review could help give  
20 others the same confidence that we have."

21 To your recollection, was that the frame of  
22 reference for any consideration of  
23 an independent review --

24 **A.** I can't recall. May have been. I can't recall.

25 **Q.** -- ie we're not actually going to look to see

167

1 of the Post Office at the time, that the  
2 priority, the main thing, should be to close  
3 down issues that cause, in this case, Channel 4  
4 to consider this to be a news item?

5 **A.** No, I think on the basis that everyone has been  
6 told the system is robust and reliable, then  
7 that's why they're looking to change challenge  
8 the adverse media.

9 **Q.** To your knowledge, did anyone ever put their  
10 hand up and say, "Hold on, actually, the  
11 priority is to see if there's a problem with  
12 Horizon"?

13 **A.** I can't recall but there may easily have been.

14 **Q.** Or "Actually, the priority -- I'm sorry to have  
15 to raise this, everyone, the priority is  
16 actually to see if we have sent anybody to  
17 prison that shouldn't have gone to prison"?

18 **A.** Mm-hm. No, sorry, I can't recall.

19 **Q.** "The priority is establish whether anyone  
20 innocent has been convicted on the basis of data  
21 that's unreliable, that's the priority". Did  
22 anyone ever say that, to your knowledge?

23 **A.** No, I don't recall that.

24 **Q.** Ever been in a meeting where anyone raised that  
25 point?

166

1 whether there's anything wrong with the system;  
2 we're only going to look at it because we  
3 believe the system is robust, and we need to  
4 convince others?

5 **A.** There was the belief that the system was robust  
6 and reliable.

7 **Q.** He continues:

8 "Our [discussion] between IT, Legal,  
9 [Product and Branch Accounting], Security and  
10 the Press Office has continued to be that no  
11 matter what opinions we obtain, people will  
12 still ask 'what if' and the defence will always  
13 ask questions that require answers beyond the  
14 report. Further such a report would only have  
15 merit as at the date of creation and would have  
16 to be updated at the point at which Horizon or  
17 the numerous component platforms are upgraded."

18 You see it says, "Our [discussion] between",  
19 amongst others, Security, did that discussion --

20 **SIR WYN WILLIAMS:** Sorry, Mr Beer. It's "decision".

21 **MR BEER:** Quite right:

22 "Our decision between [amongst others]  
23 Security ... has continued to be that no matter  
24 what opinions we obtain", et cetera.

25 Was that decision one to which you were

168

1 a party?

2 **A.** I don't recall. It's most likely I'd have

3 delegated that down to the people involved in

4 the draft report.

5 **Q.** Were you party to any discussions or

6 decision-making process that the Press Office

7 contributed to?

8 **A.** Sorry, can you give a bit more clarity on that?

9 **Q.** Yes. Were you a party to any discussion or

10 decision-making process to which the Press

11 Office was a party?

12 **A.** Not that I recall.

13 **Q.** Mr Ismay gives us a reason for not seeking

14 an independent report, that such a report would

15 only have merit as at the date of creation and

16 would have to be updated. Would you agree that

17 that's true of all reports that are seeking to

18 assess the reliability of, for example,

19 a computer system?

20 **A.** I guess there's an element to that but I'd say

21 that a report wouldn't last -- it has more than

22 just the date of the creation, I'd say.

23 **Q.** Well, in this case, at 2010, it had the ability

24 to look 10 years backwards, hadn't it?

25 **A.** *(The witness nodded)*

169

1 would have difficulty in standing in court and

2 speaking to their report?

3 **A.** No.

4 **Q.** Over the page, please.

5 "It is also important [says Mr Ismay] to be

6 crystal clear about any review if one were

7 commissioned -- any investigation would need to

8 be disclosed in court. Although we would be

9 doing the review to comfortable others, any

10 perception that [the Post Office] doubts its own

11 systems would mean that all criminal

12 prosecutions would have to be stayed. It would

13 also beg a question for the Court of Appeal over

14 past prosecutions and imprisonments."

15 When you received this report, did you

16 understand that a reason for not getting outside

17 experts in is that a product of their work may

18 have to be disclosed in court proceedings?

19 **A.** I don't actually recall this document from back

20 then and I think I saw Rob Wilson's name on it,

21 so I think that would have been covered off by

22 Rob Wilson.

23 **Q.** What do you think of it now, as a reason not to

24 get an independent report, that it might uncover

25 things that you have to disclose in court, as

171

1 **Q.** Wouldn't that be a value in itself?

2 **A.** Yes.

3 **Q.** So how do you understand the expression of

4 a reason for not getting an independent review,

5 that the report would only have merit at the

6 date of its creation?

7 **A.** I can't say I could agree with that.

8 **Q.** But is it a bit worse than that: it's palpably

9 weak as a reason?

10 **A.** No, I think it doesn't -- doing a review over

11 10 years, that is worthwhile because then you

12 flush everything out.

13 **Q.** He says:

14 "Ernst & Young and Deloitte are both aware

15 of the issue from the media and we have

16 discussed the pros and cons of reports with

17 them. Both would propose significant caveats

18 and would have limits on their ability to stand

19 in court ... we have not pursued this further."

20 Do you know what the caveats that Ernst &

21 Young and Deloitte said that they would have to

22 make.

23 **A.** No, sorry, I don't even recall being in any of

24 those conversations.

25 **Q.** Do you know why external auditors or experts

170

1 a reason for not going and getting

2 an independent expert report?

3 **A.** It's not.

4 **Q.** I'm sorry?

5 **A.** It's not.

6 **Q.** It's not a good reason, is it?

7 **A.** No.

8 **Q.** So when you get this report, presumably you read

9 it?

10 **A.** Almost certainly, I would have thought so.

11 **Q.** Wouldn't these things strike you "Hold on, the

12 reasoning here is paper thin for not getting

13 an expert report. Why aren't we doing this"?

14 **A.** I can't recall, although knowing that Rob

15 Wilson's on the circulation as Head of Criminal

16 Law, I'd have expected him to have responded.

17 **Q.** Well, indeed, that appears to be a reflection or

18 a summary of the Rob Wilson advice, doesn't it?

19 **A.** Yes, which I didn't see. I wasn't on that

20 email.

21 **Q.** The warning shot, "Be careful what you wish for,

22 if you go and get an expert report, you might

23 have to disclose it in criminal proceedings".

24 That's essentially what's being said here.

25 Again, is the absence of any kickback or

172

1 reaction to this by you or, indeed, others  
 2 symptomatic of the fact that you like what this  
 3 report said, "We don't need to go and get  
 4 independent expert evidence, we've got our guy,  
 5 Rod Ismay, to say that everything is fine, let  
 6 the caravan move on?" Was that the prevailing  
 7 attitude at the time?  
 8 **A.** Sorry, no, I just don't recall it as that.  
 9 **Q.** Can we go back to page 1, please. Halfway down,  
 10 please, he says:  
 11 "This paper has been compiled as  
 12 an objective, internal review ..."  
 13 Did you know what Mr Ismay's terms of  
 14 reference were?  
 15 **A.** I don't recall and, probably, I wouldn't have  
 16 known if I've just received that and not been  
 17 involved in the draft.  
 18 **Q.** He has told the Chairman on his oath that his  
 19 terms of reference were only to look for and to  
 20 include evidence that supported the integrity of  
 21 Horizon, to not be objective and not included  
 22 any material that undermined the integrity of  
 23 Horizon. Did you know that?  
 24 **A.** No.  
 25 **Q.** So what did you do with this report when you got  
 173

1 in information gathering and data/intelligence  
 2 to identify and drive down losses."  
 3 You were keen to drive the compilation and  
 4 analysis of POL information across the security  
 5 business. Your ethos was one of loss prevention  
 6 rather than being reactive. That's essentially  
 7 what you told us first thing this morning?  
 8 **A.** Yes.  
 9 **Q.** In 25, over the page, please, on page 9, in the  
 10 third line, you say you commissioned:  
 11 "... Detica, a subsidiary of BAE Systems to  
 12 conduct an initial review of [Post Office's]  
 13 systems with a loss and fraud digitalisation  
 14 goal in mind."  
 15 Then over the page at 26, you say:  
 16 "To summarise, my role as Head of Security  
 17 was [multifaceted] which, amongst other things,  
 18 required me to manage sensitive and demanding  
 19 situations, travel frequently and oversee  
 20 various large and complex projects."  
 21 **A.** Yes.  
 22 **Q.** In those paragraphs, you appear to suggest that  
 23 your knowledge of the day-to-day activities of  
 24 your staff was limited, would that be right?  
 25 **A.** Yes, I operated more strategically and left that  
 175

1 it?  
 2 **A.** I don't recall what I did with the report, to be  
 3 honest.  
 4 **Q.** Did you issue any instructions about the  
 5 necessity of disclosure of it in any criminal  
 6 proceedings?  
 7 **A.** I don't recall --  
 8 **Q.** Were you aware of any criminal proceedings in  
 9 which it was disclosed?  
 10 **A.** No, I don't recall that.  
 11 **Q.** Can we turn to a new topic, please. That can  
 12 come down. Your role in Horizon integrity  
 13 cases. Can we turn up paragraphs 20 to 26 of  
 14 your first witness statement, please. That's  
 15 WITN08390100. Paragraph 20 starts on page 7.  
 16 Between paragraphs 20 and 26, you tell us about  
 17 your role as Head of Security. You tell us in  
 18 20 there are a range of serious issues that  
 19 required your attention.  
 20 In 21 and 22 you tell us about physical  
 21 threats and attacks on subpostmasters and then,  
 22 over the page, to paragraph 23, you carry on  
 23 talking about physical threats. Then on 24, you  
 24 say that, on taking up the role:  
 25 "... I brought with me a personal interest  
 174

1 to the heads of the respective strands.  
 2 **Q.** If we go back to page 6, please, you tell us in  
 3 paragraph 18, second sentence:  
 4 "I was informed by my predecessor, Tony  
 5 Marsh, that the Fraud Team was well established,  
 6 that the investigative framework was effective  
 7 and running well, and that the investigators  
 8 were proficient in their role and able to  
 9 effectively organise and run investigations.  
 10 That was also my experience."  
 11 Then about ten lines on:  
 12 "I was not involved in carrying out or  
 13 overseeing criminal investigations on  
 14 a day-to-day basis ..."  
 15 Then the last line:  
 16 "To [an extent] the Fraud team ran itself  
 17 ..."  
 18 **A.** Yes.  
 19 **Q.** Does it follow that you did not have oversight  
 20 of and, therefore, no responsibility for the  
 21 actions of some to of those under your command,  
 22 who had a part in the prosecution of  
 23 subpostmasters?  
 24 **A.** I was the Head of Security, so overall in  
 25 charge, but the day-to-day operations was  
 176

1 managed by the respective heads of the  
 2 respective strands.

3 **Q.** So would you put it this way: that, although you  
 4 might have theoretical accountability for the  
 5 actions of some of them who were operating under  
 6 your command, in fact, you'd got no factual  
 7 responsibility for what they did or failed to  
 8 do?

9 **A.** No, overall, as Head of Security, ultimately, it  
 10 comes up to me if anything gets escalated or  
 11 reported to me or it's not working in the  
 12 correct fashion. But the day-to-day management  
 13 of the operations and the teams was delegated to  
 14 the heads of the strands.

15 **Q.** But, as a matter of fact, you didn't have  
 16 oversight of and responsibility for their  
 17 actions?

18 **A.** Not on a day-to-day basis.

19 **Q.** Was, therefore, the Security Department  
 20 structured in a way that meant that you had no  
 21 proper oversight of what they were doing on  
 22 a day-to-day basis?

23 **A.** No, I did have formal meetings, one-to-ones,  
 24 with the heads of -- and if we're talking about  
 25 the Fraud and Security Operations, so we did

177

1 therefore, you didn't involve yourself in it?

2 **A.** No, so, as I said, I did meet up with the head  
 3 of the Fraud strand and security operations.  
 4 I'd meet with lawyers as well and have  
 5 discussions around the performance and  
 6 proficiency of the cases and case files and the  
 7 evidence. I even travelled to Scotland and  
 8 Northern Ireland once to see our external  
 9 criminal lawyers and they gave me comfort that  
 10 all was appropriate and correct. So there was  
 11 a number of different channels that I was  
 12 looking at.

13 **Q.** In his witness statement -- I'll give the  
 14 reference, no need to bring it up, it's  
 15 WITN08160100 -- at paragraph 47, Mr Hayward of  
 16 your department said that he was made aware of  
 17 issues raised regarding Horizon integrity,  
 18 although he had no direct involvement in dealing  
 19 with them:

20 "This was being led by others within the  
 21 business. With regard to the Security team,  
 22 updates were provided by the Head of Security,  
 23 JS, in summary, these being that the Horizon  
 24 integrity issues were being reviewed. JS also  
 25 requested that all case files were passed to him

179

1 meet on formal one-to-ones. They'd also have  
 2 a formal Security lead team meeting on a monthly  
 3 basis where things were raised, et cetera.

4 **Q.** If we go forward to page 16 of your witness  
 5 statement and look at paragraph 43. You say:  
 6 "The Fraud strand senior management and team  
 7 leaders were responsible for the conduct of the  
 8 investigations along with the investigators. As  
 9 explained in paragraph 18 [which I've just taken  
 10 you to], I was told by my predecessor that the  
 11 investigators in the team were experienced and  
 12 I understood they were well versed in  
 13 investigative processes. I therefore assume  
 14 that it would have been the investigators  
 15 themselves who would decide how a criminal  
 16 investigation would be conducted, applying the  
 17 relevant policies as appropriate."

18 Did you ever think to question that or did  
 19 you proceed on the assumption that you have set  
 20 out?

21 **A.** In -- set out?

22 **Q.** You assumed that everyone was doing things  
 23 correctly, they were well versed in  
 24 investigative processes. They would decide how  
 25 to conduct a criminal investigation and,

178

1 for personal review."

2 Are you the "JS" that Mr Hayward is  
 3 referring to there?

4 **A.** Potentially. What year?

5 **Q.** Well, he refers to -- I'm not sure if this will  
 6 be on the system but POL00095547.

7 No, not on the system. I believe it's 2011.  
 8 He refers to a document in the introduction to  
 9 that paragraph --

10 **A.** Yes.

11 **Q.** -- and says, "With regard to this document,  
 12 I say as follows". I believe that's 2011?

13 I think you say in your first witness  
 14 statement it was only in 2013 and in your second  
 15 witness statement you say, "I've been shown some  
 16 more documents", and you think that it was 2012.

17 **A.** Ah. So that's different, talking about  
 18 different things --

19 **Q.** Okay.

20 **A.** So if you're talking 2011, I do not recall case  
 21 files being sent to me, because you'll be  
 22 talking -- they had 200 or 300 on the go at any  
 23 one point and I can't recall receiving 200 or  
 24 300 case files. In terms of 2012/2013 that you  
 25 just mentioned is around being asked by my line

180

1 manager, Susan Crichton, to take on the role of  
2 decision-maker for prosecution, so that would be  
3 at some point in 2012, most likely the  
4 separation would've triggered that, but  
5 I believe now, looking at documents, that would  
6 have ceased mid-2013.

7 In terms of all the case papers, in my  
8 statement, what I have said is that I initiated  
9 then a monthly review meeting for the  
10 investigation and prosecution status, which all  
11 the cases were reviewed. At that meeting I had  
12 Cartwright King solicitors in the meeting as  
13 well.

14 **Q.** So, in summary, then, when did you first take  
15 over the responsibility for decision making on  
16 whether there should be a prosecution or not?

17 **A.** So I believe now it's around about 2012.

18 **Q.** What was the instigation or the reason for you  
19 taking that over?

20 **A.** I can't recall. It may have been the separation  
21 of Royal Mail Group.

22 **Q.** Why would the separation from RMG have  
23 necessitated you taking over that function?

24 **A.** I don't know. I remember speaking to Susan  
25 Crichton as to whether we will continue with

181

1 appreciating this is 10 years on, did your  
2 understanding of your function amount to you  
3 signing off on a decision that had already been  
4 made by the lawyers?

5 **A.** I believe so, yes.

6 **Q.** So to what extent did you review the underlying  
7 material?

8 **A.** I would have reviewed it. If it was case  
9 papers, I'd have gone through all the case  
10 papers.

11 **Q.** Sorry, can you just say that again? I missed  
12 what you said there?

13 **A.** Yeah, if the case papers were sent to me, I'd  
14 have read all the case papers, including the  
15 suspect offender report, the tape summary, any  
16 other sort of material and, obviously, the legal  
17 advice.

18 **Q.** Did it always consist of all of that material or  
19 sometimes did you just get offender report plus  
20 legal advice?

21 **A.** I can't recall, I think it was generally always  
22 more stuff, to be honest.

23 **Q.** In the course of reviewing those cases for the  
24 prosecution, can you recall asking for enquiries  
25 to be made or investigations being undertaken,

183

1 prosecutions or not in separation, because  
2 I needed to know whether to -- how to manage the  
3 structure of the team and it may have been  
4 instigated from that discussion but I can't  
5 recall.

6 **Q.** In your witness statement, if we look at page 6,  
7 please, at the foot of the page, page 19, you  
8 say:

9 "My remit in respect of investigations did  
10 slightly change towards the end of 2013 ..."

11 That's what you've corrected to "2012"?

12 **A.** Yeah.

13 **Q.** "... when I was asked by my line manager at the  
14 time ... Susan Crichton, to review and sign off  
15 on any new investigation files ..."

16 What do you mean by "sign off"? That may  
17 give the impression, if you sign off on  
18 something, that you are merely endorsing that  
19 which has already been decided.

20 **A.** Well, I obviously am signing to say that we will  
21 continue progressing to a prosecution.

22 **Q.** "We will continue to progress" or "I authorise  
23 the institution of criminal proceedings"?

24 **A.** I guess it will be authorised.

25 **Q.** Again, it's the language that you've used and,

182

1 in the light of what we've seen happen in 2010  
2 and 2011 about Horizon integrity issues, for  
3 those questions to be actively considered in the  
4 investigations that you were signing off for  
5 prosecution?

6 **A.** I can't recall saying that or doing that.

7 **Q.** But why not?

8 **A.** I can't recall whether I did or didn't.

9 **Q.** You think you might have asked for statements  
10 proving the integrity of Horizon?

11 **A.** On that, most likely not. I don't recall doing  
12 that.

13 **Q.** Can I turn to a separate topic -- that can come  
14 down, thank you -- your role in reporting to the  
15 board. Did you report to the board?

16 **A.** I don't recall reporting to the board, RMG or  
17 Post Office.

18 **Q.** Did you report to the Risk and Compliance  
19 Committee?

20 **A.** Yes.

21 **Q.** What was your understanding of what the Risk and  
22 Compliance Committee's function was?

23 **A.** To provide oversight from a risk and compliance  
24 perspective of Post Office.

25 **Q.** How frequently did you attend upon the Risk and

184

1 Compliance Committee?  
 2 **A.** I don't think I was quorum. I believe I was  
 3 a member and attended as and when. I can't  
 4 recall. They varied throughout the 10 years, so  
 5 I can't recall whether they were monthly or  
 6 quarterly, and that may have changed throughout  
 7 the 10 years.

8 **Q.** Can we look, please, at an example of  
 9 attendance, POL00021422. Thank you. If we can  
 10 just expand that, the first page is landscape.  
 11 Thank you.

12 The chairman was Peter Corbett. We can see  
 13 the attendees, Paula Vennells, you and David  
 14 Pardoe, Secretariat. Was that the same person  
 15 that became part of Security?

16 **A.** Sorry, yes, he was Security.

17 **Q.** Was he Security at this time?

18 **A.** Yes.

19 **Q.** So Security provided the Secretariat function  
 20 for the Risk and Compliance Committee?

21 **A.** Looking at that, yes.

22 **Q.** Can you recall how frequently the Risk and  
 23 Compliance Committee met?

24 **A.** No, it would either be monthly or quarterly.

25 **Q.** I'm sorry?

185

1 **A.** I think he was Head of Compliance.

2 **Q.** "... concurred and expanded on option one by  
 3 saying that this could well see a first quarter  
 4 'blitz' on the Crown estate."

5 Was this a theme at this time, at 2008,  
 6 early 2008, to seek to reduce losses from both  
 7 the Crown estate and from subpostmasters?

8 **A.** Yes.

9 **Q.** Was investigation and prosecution, including the  
 10 use of confiscation proceedings, the means by  
 11 which that was to be done?

12 **A.** No. I was taking a very much preventative  
 13 approach and putting in other mechanisms or  
 14 programmes in which to drive up compliance.

15 **Q.** So the "blitz" here is a preventative blitz?

16 **A.** Yes.

17 **Q.** Not a prosecution blitz?

18 **A.** Preventative.

19 **Q.** How would you preventatively blitz Crown  
 20 Offices?

21 **A.** I can't exactly recall but I imagine we would  
 22 have done analysis to see where recorded losses  
 23 are happening in the Crowns and there would have  
 24 been interventions, whether directly training  
 25 comms, et cetera.

187

1 **A.** No, I can't recall exactly but it would either  
 2 be monthly or quarterly.

3 **Q.** We haven't got a complete set, I think, of the  
 4 minutes to be able to see with precision how  
 5 frequently it met. What would determine whether  
 6 you attended or not?

7 **A.** At this particular time?

8 **Q.** Yes.

9 **A.** Yes. Um ...

10 **Q.** So this a year or so into your role?

11 **A.** I suspect I would be attending them all at that  
 12 stage.

13 **Q.** You would expect?

14 **A.** To be attending them all at that stage.

15 **Q.** Can we look, as an example, of the kind of  
 16 contributions you made at page 8, please, and  
 17 scroll down please.

18 You're recorded as telling the Committee  
 19 that you planned to see your team lead  
 20 an initiative on further reducing Crown losses,  
 21 2008/09, by at least 25 per cent. You were  
 22 pleased to see that consideration was being  
 23 given to renewed focus in this area:

Keith Woollard ..."

24 Can you remember what his function was?

25

186

1 **Q.** Can we look, please, at POL00031322. This is  
 2 a report of the Risk and Compliance Committee  
 3 from the following year -- or a report, I think,  
 4 to the Risk and Compliance Committee, of the  
 5 following year. You can see that, by now, it  
 6 records the members on the one hand and then  
 7 other attendees on the other, and you're listed  
 8 as an "other attendee". Does that mean that, by  
 9 this time, you weren't a standing member?

10 **A.** By the looks of this, yes.

11 **Q.** I just want to pick up a couple of pieces of  
 12 information given here. Can we look at slide  
 13 15, please, page 15. This slide gives  
 14 diagrammatic explanations of "Asset Recovery  
 15 Against Fraud", the commentary being for all  
 16 closed cases, the year to date figure is  
 17 £237,000 recovered against identified losses of  
 18 £360,000, and the current year to date figure  
 19 for recoveries is 66 per cent.

20 Then, in the explanation below, it's said  
 21 that the Security team currently has 56 cases on  
 22 hand with a total loss of £4.8 million being  
 23 investigated under the Proceeds of Crime Act.  
 24 Through the provisions of the Proceeds of Crime  
 25 Act legislation, the Security team continue to

188

1 robustly restrain identified assets. This has  
2 resulted in significant understands being  
3 recovered when cases are progressed to  
4 confiscation than may otherwise have been  
5 dissipated.

6 Then an example is given of a case at  
7 Kingston Crown Court, a confiscation order of  
8 £43,600 was set, this being the available amount  
9 from assets identified, of which £21,500 in cash  
10 had been restrained in various bank accounts.  
11 The Post Office was awarded the full amount in  
12 compensation. A total the benefit from crime  
13 figure was set at £99,400. The initial  
14 investigation was £73,000.

15 Does this report show that seizing money  
16 through confiscation proceedings from  
17 subpostmasters and Crown Office agents was still  
18 an important element of your investigative and  
19 prosecutorial strategy?

20 **A.** It was an established team that, when I took  
21 over, it was a requirement for me to continue  
22 but yes, that's what that team was there for,  
23 was asset recovery, when someone has been  
24 convicted at court.

25 **Q.** The figures there in that last case, a total  
189

1 **A.** From around about 2010/2011 until I left the  
2 Post Office.

3 **Q.** Thank you very much. If you just give me one  
4 moment, I'll just check my notes.

5 Yes, one set of last questions, please. If  
6 we can turn up page 73 of your witness  
7 statement, which is on page 26. You say in  
8 paragraph 73, at the foot of the page:

9 "The Inquiry has asked me to consider the  
10 following policies and explain my role in their  
11 development ..."

12 You then list 13 policies that we asked you  
13 to look at. You say:

14 "I do not recall these policies and had no  
15 role in their development, including those that  
16 list me as an owner or assurer, such as  
17 POL00030580. Any policies on prosecution would  
18 have been decided by RMG prior to separation,  
19 and post separation by the POL Board and the  
20 Legal Team."

21 Can we just look at one of those, I'm not  
22 going to go through all 13. The one that you  
23 list, POL00030580. This is a policy of April  
24 2010. So it's three years after you took up the  
25 role as Head of Security. It's about fraud  
191

1 benefit from crime figure was £99,000 but the  
2 loss was only £73,000.

3 **A.** Yes.

4 **Q.** Was that quite common, that the benefit from  
5 crime figure was assessed to be greater than the  
6 amount that the Post Office had lost?

7 **A.** Obviously, I can see that there. So I did have  
8 an escalation in regards to an increase. Went  
9 and reviewed it with the FIU team, found that  
10 they had added a calculation that was more than  
11 a loss and, at that point, I put in  
12 an instruction to say that you only claim what  
13 was actually stolen and proven at court.

14 **Q.** Was the Risk and Compliance Committee your route  
15 as the Head of the Security team, into reporting  
16 issues into the board, essentially?

17 **A.** Essentially, that's where I reported into.  
18 Whether that went into the board or ExCo, I'm  
19 not too sure which way it went.

20 **Q.** Who was your direct report, as Head of Security?  
21 To whom did you report directly?

22 **A.** So, over the period, it was Ric Francis, Mike  
23 Young, Susan Crichton, Chris Aujard, Jane  
24 McLeod.

25 **Q.** So for a period it was General Counsel?  
190

1 investigation and prosecution. Can you see that  
2 it says the owner of the policy is you?

3 **A.** Yes.

4 **Q.** If we scroll down, please, it says the assurance  
5 of the policy was given by you, yes?

6 **A.** Well, it's not dated.

7 **Q.** In what respect is it not dated?

8 **A.** As in me actually saying it's assured and dated  
9 as and when I did it.

10 **Q.** I see, so on the right-hand column?

11 **A.** Yes, and also, I'm not too sure I'd have been  
12 able to sign it off, because Royal Mail Group  
13 was the group parent and it's their prosecution  
14 policy that was the overarching one.

15 **Q.** Would you make the similar comment for it being  
16 authorised by you?

17 **A.** Err --

18 **Q.** The sentence underneath --

19 **A.** Yes.

20 **Q.** -- "Authorised, Head of Security -- Post Office  
21 Limited"?

22 **A.** Yes.

23 **Q.** So, essentially, you're being verballed up on  
24 this policy here, aren't you? It's being said  
25 that you own it, you assured it and you  
192



1 authorised it?

2 **A.** I can't recall it and I can't recall seeing it

3 before. So I'm not too sure what its existence

4 is there for.

5 **Q.** If I showed you a number of other policies where

6 you're the owner, you gave assurance, you'd say

7 the same thing, would you?

8 **A.** Some of them, I can see, have been -- my name

9 put on as for the seniority of the head of, but

10 I wasn't into policy writing. That would be

11 someone else.

12 **Q.** Was it common practice within the Post Office to

13 list the wrong person as being the owner of

14 a policy, the wrong person for assuring

15 a policy, and the wrong person for authorising

16 a policy?

17 **A.** No, I'm not -- well, I don't recall this because

18 there's no date and I'm not too sure I would

19 have signed it off because it's a Royal Mail

20 Group overarching prosecution policy. Post

21 Office couldn't have its own prosecution policy.

22 **Q.** So whoever has written this has wrongly included

23 your name? There should be one or two or three

24 different names on here?

25 **A.** Well, it shouldn't have been written because the

193

1 **MR BEER:** Yes, thank you very much, Mr Scott.

2 I think there's one set of questions from

3 the Hodge Jones & Allen representative, sir.

4 **SIR WYN WILLIAMS:** All right.

5 **Questioned by MS PAGE**

6 **MS PAGE:** Thank you, sir.

7 Mr Scott, I represent a group of

8 subpostmasters --

9 Hello, I represent a group of

10 subpostmasters, including Seema Misra. You were

11 taken to an email earlier on, just to help us

12 with the questions on it and to ask some other

13 questions on it, I'll ask that it's brought up.

14 It's POL00119858. If we can go down to the

15 final paragraph in that email and refresh your

16 memory of it, it says:

17 "I found out today ..."

18 This was the email from Rod Ismay, which was

19 dealing with whether there should be

20 an independent report on Horizon in 2010. But

21 he also says here at the end:

22 "I found out today that Carole Cross in my

23 team and Jon Longman from yours ... are in court

24 soon for West Byfleet ... This, apparently, is

25 an office who as part of their defence is

195

1 Royal Mail Group prosecution policy should have

2 been in existence. But, potentially, yes.

3 **Q.** Again, was that a common thing, that people who

4 owned policies were not listed on them, but the

5 wrong person was?

6 **A.** Not that I recall. I mean, if this still in

7 draft, then it's not gone to live.

8 **Q.** You say this is still in draft.

9 **A.** It may be because there's no date.

10 **Q.** So, in order to show that this was a policy that

11 was extant, you would want, in that right-hand

12 column, would you, two dates against "Assurance"

13 and "Authorised"?

14 **A.** In principle, yes.

15 **Q.** You say in principle, do you mean, actually,

16 yes?

17 **A.** Yes.

18 **Q.** So does it follow that we shouldn't rely on any

19 policy as being that of the Post Office, unless

20 it has got a date against all relevant boxes of

21 owner assurance and authorisation?

22 **A.** It gives more evidence to say that, actually,

23 it's been approved, it's been assured and it has

24 therefore gone live. Without a date, it puts it

25 into doubt.

194

1 challenging the integrity of Horizon."

2 So that raises the trial that was -- became

3 quite well known and you're obviously finding

4 out about it here in mid-2010, yes?

5 Did you know anything about it before then?

6 **A.** No, I don't recall and he's obviously only

7 mentioned it by the Post Office name.

8 **Q.** Yes. Well, he goes on to say -- after asking

9 Mandy whether she's involved, he says:

10 "I think we need to be clear about all live

11 cases so that we ensure that the same consistent

12 robust response throughout and based on the

13 sensible principles of Dave's email", et cetera.

14 So, in other words, he's suggesting that the

15 three of you -- the three of you in this email

16 chain -- need to be clear about all live cases

17 from this point forward, yes?

18 **A.** That's what he's indicating.

19 **Q.** So you will have -- you, Mr Ismay and Ms Talbot,

20 will have kept a bit of watching brief

21 thereafter on that case; is that a fair

22 assumption?

23 **A.** I don't recall. It's not necessarily the case,

24 just because someone wrote me an email and said

25 that's what they're doing.

196

1 Q. So are you saying that you don't remember the  
2 West Byfleet trial, the *Seema Misra* trial?

3 A. I don't particularly recall it when it's  
4 obviously come out over the last couple of  
5 years. So it didn't trigger anything, I don't  
6 recall it.

7 Q. So when he suggests that the three of you need  
8 to keep an eye on all live cases, you just  
9 ignored that, did you?

10 A. No, we obviously must keep a look on all live  
11 cases but I don't recall looking out for this  
12 particular one on its own.

13 Q. Even in the context of the fact that the  
14 challenge to the integrity of Horizon was the  
15 key theme in that case?

16 A. Sorry, I don't recall.

17 Q. All right. Well, let's take that document down,  
18 then, and look at the next one, which is the  
19 only other one I'm going to show you. It's  
20 FUJ00155516. If we just go down to the end of  
21 this two-page chain, we can see this is an email  
22 from someone called Tom Lillywhite and he's at  
23 Fujitsu, yes?

24 A. Yes.

25 Q. Is that a name that rings a bell or not  
197

1 gathered in respect of this particular ARQ may  
2 be subject to issues of integrity. Our  
3 technical staff have investigated the record in  
4 question and, at this stage, although they  
5 report that there is no obvious evidence of  
6 suspicious behaviour, they can add nothing  
7 further with any certainty and they do not have  
8 the ability to determine if there really are any  
9 financial implications with the messages. In  
10 other words, any response from us would have to  
11 bear the health warning that there was no  
12 guarantee as to the integrity of the data  
13 provided by us.

14 "The issue is of particular relevance in  
15 light of the fact that provision of an ARQ could  
16 result in a request for a Statement of Witness  
17 to support litigation activity. As such, any  
18 Statement of Witness provided would, in real  
19 terms, have to reflect this."

20 So let's just be clear about what he's  
21 saying there. He's saying that an ARQ request  
22 has come through for a particular outlet, that  
23 is Derby. An ARQ request is evidently one where  
24 somebody in your team, the Security team, have  
25 asked for data from the branch, yes?  
199

1 particularly?

2 A. No.

3 Q. Well, if we go up, just to the top of this  
4 email, we can see that he's sent you this email  
5 on 14 September 2010 and he's copied in two  
6 others. He says:

7 "John,

8 "The email text I promised, following our  
9 telephone call ..."

10 So evidently the two of you have spoken just  
11 prior to him sending this message, yes? Does  
12 that make sense to you?

13 A. Yes.

14 Q. He says this:

15 "Our RMG Account Fraud and Litigation  
16 Service are currently acting on an ARQ [and he  
17 gives a reference]. This request for  
18 transaction records which covers March 2010, is  
19 in respect to an outlet (Derby) which is already  
20 migrated to HNG-X."

21 He says:

22 "Because of number of technical issues  
23 (errors detected) that arose during migration up  
24 to June 2010, and which POL technical  
25 specialists are aware of, the information  
198

1 A. I presume so, yes.

2 Q. What he's saying is that, because of a known  
3 issue they can't say that that data has any  
4 integrity, yes? So there is a known issue about  
5 Horizon data integrity --

6 A. On that particular one, yes.

7 Q. -- and he's alerting you to it, yes?

8 A. Yes.

9 Q. If we go further up, we can see your response.  
10 On 18 September you respond, and say:

11 "Tom.

12 "Thank you for your telephone call and email  
13 in regards to the matter below.

14 "Just to let you know the outcome, the ARQ  
15 was raised due to a key entry discrepancy in  
16 a customer deposit. There is no investigation  
17 in this matter and will therefore not be used in  
18 Court.

19 "I would also be grateful if you could  
20 advise if there are any other ARQs at risk."

21 If we scroll up, we can see that seems to be  
22 pretty much the end of the matter, as far as you  
23 are concerned.

24 What you don't say is "You've alerted my  
25 attention to a known Horizon data integrity  
200

1 issue", do you?  
 2 **A.** No, not that I can see.  
 3 **Q.** This is in September 2010. This is just after  
 4 you had received the Rod Ismay August 2010  
 5 report, which claimed that there were no Horizon  
 6 integrity issues. Do you see anything  
 7 problematic about your response, Mr Scott?  
 8 **A.** I can see that it was a known technical issue.  
 9 It was known. They went to the root cause to  
 10 understand it and, therefore, from my  
 11 perspective looking at that, it's an isolated  
 12 issue that was known, root caused and resolved.  
 13 **Q.** What led you to think it was a known, root  
 14 caused issue?  
 15 **A.** From the -- well, it says it's a technical  
 16 issue --  
 17 **Q.** Yes.  
 18 **A.** -- from what I've seen there.  
 19 **Q.** Yes.  
 20 **A.** I mean, I've literally only just seen this.  
 21 I don't recall seeing this document before.  
 22 **Q.** There's nothing in it that suggests that this is  
 23 a limited issue or that it's only related to  
 24 this branch. It's a known issue and you haven't  
 25 raised it, have you, with Mr Ismay, who has just  
 201

1 evidence and answering a good many questions.  
 2 **THE WITNESS:** Can I just confirm I'm released and  
 3 I can speak to my lawyers?  
 4 **SIR WYN WILLIAMS:** Yes.  
 5 **MR BEER:** Yes, that's right. Thank you very much.  
 6 **SIR WYN WILLIAMS:** So we start again at 10.00,  
 7 Mr Beer, yes?  
 8 **MR BEER:** Yes. Rob Wilson.  
 9 **SIR WYN WILLIAMS:** All right. Thank you very much.  
 10 (4.14 pm)

(The hearing adjourned until 10.00 am  
 the following day)

1 written a report on the integrity of Horizon?  
 2 **A.** I don't recall whether I have or not.  
 3 **Q.** You haven't raised it with the *Seema Misra*  
 4 defence team who were, at that very time,  
 5 conducting a defence which raised the issue of  
 6 the integrity of Horizon?  
 7 **A.** Sorry, I don't recall.  
 8 **Q.** Do you wish to take any share of responsibility  
 9 for the fact that your team -- you, in  
 10 particular -- knew about a Horizon data  
 11 integrity issue in the month before Seema Misra  
 12 was tried and convicted? Do you wish to take  
 13 any responsibility for the failure to disclose  
 14 that to her team?  
 15 **A.** I can see it. I don't know whether I did  
 16 disclose it or not or forward it on. If  
 17 I should have done, my apologies, but I don't  
 18 know whether I did or didn't. I just can't  
 19 recall.  
 20 **MS PAGE:** Thank you. Those are my questions.  
 21 **SIR WYN WILLIAMS:** Thank you, Ms Page.  
 22 So is that it, Mr Beer?  
 23 **MR BEER:** Yes, it is, sir.  
 24 **SIR WYN WILLIAMS:** Well, thank you for your witness  
 25 statement, and thank you for coming to give oral  
 202

I N D E X

|                                  |     |
|----------------------------------|-----|
| JOHN MICHAEL SCOTT (sworn) ..... | 1   |
| Questioned by MR BEER .....      | 1   |
| Questioned by MS PAGE .....      | 195 |

|   |   |   |  |   |
|---|---|---|--|---|
| <p><b>MR BEER: [24]</b> 1/3<br/>1/6 1/10 1/23 2/1 3/16<br/>64/5 64/10 64/14<br/>64/17 119/15 120/5<br/>120/10 120/13 162/9<br/>162/12 162/14 162/18<br/>162/21 168/21 195/1<br/>202/23 203/5 203/8<br/><b>MS PAGE: [2]</b> 195/6<br/>202/20<br/><b>SIR WYN WILLIAMS:</b><br/><b>[20]</b> 1/5 1/21 1/24<br/>2/2 3/14 64/8 64/16<br/>119/19 120/6 120/12<br/>162/11 162/13 162/20<br/>168/20 195/4 202/21<br/>202/24 203/4 203/6<br/>203/9<br/><b>THE WITNESS: [2]</b><br/>120/4 203/2</p> <hr/> <p>'<b>13 [1]</b> 33/4<br/>'<b>84 [1]</b> 6/2<br/>'<b>92 [1]</b> 6/2<br/>'<b>Accounting' [1]</b><br/>145/15<br/>'<b>attended' [2]</b> 26/5<br/>51/16<br/>'<b>blitz' [1]</b> 187/4<br/>'<b>bug' [1]</b> 99/10<br/>'<b>cold [1]</b> 137/22<br/>'<b>computer [1]</b> 123/10<br/>'<b>external [1]</b> 151/19<br/>'<b>general' [1]</b> 144/18<br/>'<b>if [2]</b> 55/3 55/5<br/>'<b>least [1]</b> 149/2<br/>'<b>legally [1]</b> 84/20<br/>'<b>Negroid [1]</b> 115/6<br/>'<b>no [2]</b> 127/11 138/17<br/>'<b>other [1]</b> 161/13<br/>'<b>outcome' [1]</b> 144/10<br/>'<b>possibly' [1]</b> 47/12<br/>'<b>Post [1]</b> 107/22<br/>'<b>Relevant' [1]</b> 82/4<br/>'<b>replying [1]</b> 85/4<br/>'<b>shredded' [1]</b> 52/21<br/>'<b>tender' [1]</b> 138/21<br/>'<b>the [2]</b> 127/12<br/>127/13<br/>'<b>We [1]</b> 159/20<br/>'<b>what [1]</b> 168/12</p> <hr/> <p><b>0</b></p> <p><b>09 [1]</b> 186/21</p> <hr/> <p><b>1</b></p> <p><b>1 August [1]</b> 46/24<br/><b>1 August 2013 [1]</b><br/>41/8<br/><b>1.00 [1]</b> 119/17<br/><b>1.24 [1]</b> 108/25</p> | <p><b>10 [4]</b> 4/15 4/16<br/>110/22 122/8<br/><b>10 pages [1]</b> 101/9<br/><b>10 years [8]</b> 24/10<br/>53/1 151/10 169/24<br/>170/11 183/1 185/4<br/>185/7<br/><b>10.00 [3]</b> 1/2 203/6<br/>203/11<br/><b>100 [6]</b> 15/12 104/17<br/>104/17 115/2 117/2<br/>117/3<br/><b>11 October 2023 [1]</b><br/>1/1<br/><b>11.26 [1]</b> 64/11<br/><b>11.40 [2]</b> 64/7 64/13<br/><b>110 [1]</b> 105/6<br/><b>12 May [1]</b> 3/18<br/><b>12.58 [1]</b> 120/7<br/><b>13 [6]</b> 27/9 35/11<br/>60/2 60/8 191/12<br/>191/22<br/><b>13 August [1]</b> 60/10<br/><b>13th [1]</b> 89/15<br/><b>14 [1]</b> 26/12<br/><b>14 August [6]</b> 35/11<br/>60/9 61/4 78/5 78/24<br/>89/6<br/><b>14 September [1]</b><br/>198/5<br/><b>14th [2]</b> 79/24 89/16<br/><b>15 [2]</b> 188/13 188/13<br/><b>15 July [2]</b> 26/10<br/>26/13<br/><b>16 [1]</b> 178/4<br/><b>18 [3]</b> 13/1 176/3<br/>178/9<br/><b>18 September [1]</b><br/>200/10<br/><b>19 [2]</b> 167/13 182/7<br/><b>19 August [1]</b> 90/3<br/><b>19 July [3]</b> 32/14<br/>32/17 49/3<br/><b>19 July 2013 [1]</b> 32/5<br/><b>1984 [2]</b> 6/1 6/11<br/><b>1992 [1]</b> 6/1<br/><b>1993 [1]</b> 5/1<br/><b>1997 [1]</b> 8/17<br/><b>1999 [3]</b> 8/20 9/5<br/>163/2<br/><b>1st [1]</b> 143/25</p> <hr/> <p><b>2</b></p> <p><b>2 August [7]</b> 23/1<br/>23/4 50/6 51/22 57/2<br/>167/8 167/10<br/><b>2 August 2013 [1]</b><br/>50/8<br/><b>2-3 [1]</b> 150/21<br/><b>2.00 [3]</b> 119/18 120/5<br/>120/9<br/><b>2.15 [1]</b> 110/23<br/><b>2.58 [1]</b> 162/15<br/><b>20 [4]</b> 174/13 174/15</p> | <p>174/16 174/18<br/><b>200 [2]</b> 180/22<br/>180/23<br/><b>2000 [3]</b> 151/4<br/>161/25 163/2<br/><b>2004 [5]</b> 8/18 8/20<br/>9/6 10/4 10/24<br/><b>2007 [6]</b> 10/4 10/24<br/>11/8 11/14 17/15<br/>22/11<br/><b>2007/2008 [1]</b> 151/1<br/><b>2008 [7]</b> 12/3 14/5<br/>17/4 118/5 151/1<br/>187/5 187/6<br/><b>2008/09 [1]</b> 186/21<br/><b>2008/2009 [1]</b> 17/5<br/><b>2009 [2]</b> 17/5 122/4<br/><b>2009/10 [1]</b> 122/8<br/><b>2010 [24]</b> 120/17<br/>120/18 121/14 126/10<br/>127/20 134/12 140/25<br/>142/16 144/15 147/24<br/>151/1 162/25 164/10<br/>167/8 169/23 184/1<br/>191/24 195/20 196/4<br/>198/5 198/18 198/24<br/>201/3 201/4<br/><b>2010/2011 [1]</b> 191/1<br/><b>2011 [6]</b> 22/15 180/7<br/>180/12 180/20 184/2<br/>191/1<br/><b>2012 [6]</b> 22/16 118/5<br/>180/16 181/3 181/17<br/>182/11<br/><b>2012/2013 [1]</b> 180/24<br/><b>2013 [40]</b> 17/25 18/1<br/>21/6 21/11 22/11<br/>22/18 22/24 23/4 23/7<br/>24/5 26/13 32/5 32/14<br/>32/18 40/16 41/7 41/8<br/>41/13 41/16 42/13<br/>46/25 50/7 50/8 60/9<br/>61/4 78/6 80/2 86/3<br/>86/7 92/9 100/14<br/>101/6 132/16 132/17<br/>132/19 141/5 180/14<br/>180/24 181/6 182/10<br/><b>2014 [2]</b> 17/24 17/25<br/><b>2016 [7]</b> 5/2 17/17<br/>18/14 20/2 20/3 20/11<br/>118/6<br/><b>2023 [3]</b> 1/1 3/19<br/>13/23<br/><b>21 [1]</b> 174/20<br/><b>21 August [1]</b> 92/4<br/><b>21,500 [1]</b> 189/9<br/><b>213 [1]</b> 13/23<br/><b>214 [1]</b> 13/24<br/><b>22 [1]</b> 174/20<br/><b>23 [2]</b> 5/4 174/22<br/><b>237,000 [1]</b> 188/17<br/><b>24 [1]</b> 174/23<br/><b>24 February [1]</b><br/>136/25</p> | <p><b>24 July [2]</b> 39/5 39/9<br/><b>25 [2]</b> 175/9 186/21<br/><b>25 February [1]</b><br/>141/24<br/><b>26 [4]</b> 174/13 174/16<br/>175/15 191/7<br/><b>26 February [2]</b><br/>149/23 158/2<br/><b>28 August [1]</b> 92/7</p> <hr/> <p><b>3</b></p> <p><b>3 July [2]</b> 22/23 24/4<br/><b>3 July 2013 [3]</b> 21/11<br/>22/18 23/7<br/><b>3 years [1]</b> 150/25<br/><b>3.15 [2]</b> 162/12<br/>162/17<br/><b>3.2 [2]</b> 97/17 98/4<br/><b>3.3 [1]</b> 98/9<br/><b>30 [1]</b> 13/23<br/><b>300 [2]</b> 180/22<br/>180/24<br/><b>31 July [7]</b> 40/14<br/>40/16 41/6 41/13<br/>41/16 42/13 52/13<br/><b>360,000 [1]</b> 188/18<br/><b>38 [1]</b> 27/9</p> <hr/> <p><b>4</b></p> <p><b>4.14 [1]</b> 203/10<br/><b>4.8 million [1]</b> 188/22<br/><b>43 [1]</b> 178/5<br/><b>43,600 [1]</b> 189/8<br/><b>47 [2]</b> 3/20 179/15</p> <hr/> <p><b>5</b></p> <p><b>5 July 2023 [1]</b> 13/23<br/><b>5.01 [1]</b> 149/22<br/><b>5.1 [1]</b> 99/1<br/><b>5.5 [1]</b> 99/1<br/><b>50 [5]</b> 15/12 105/9<br/>115/2 117/2 117/4<br/><b>50-items [1]</b> 104/11<br/><b>56 [1]</b> 188/21</p> <hr/> <p><b>6</b></p> <p><b>6.00 pm [1]</b> 42/12<br/><b>6.2 [1]</b> 99/4<br/><b>60 [3]</b> 117/14 117/21<br/>117/22<br/><b>66 [1]</b> 188/19</p> <hr/> <p><b>7</b></p> <p><b>7.39 [1]</b> 61/5<br/><b>73 [2]</b> 191/6 191/8<br/><b>73,000 [2]</b> 189/14<br/>190/2</p> <hr/> <p><b>8</b></p> <p><b>8 March [1]</b> 144/15<br/><b>8.34 [1]</b> 60/10</p> <hr/> <p><b>9</b></p> <p><b>9 October [2]</b> 93/19</p> | <p>93/21<br/><b>9.00 [1]</b> 47/1<br/><b>94 per cent [1]</b><br/>104/18<br/><b>99,000 [1]</b> 190/1<br/><b>99,400 [1]</b> 189/13</p> <hr/> <p><b>A</b></p> <p><b>ability [3]</b> 169/23<br/>170/18 199/8<br/><b>able [8]</b> 89/1 95/18<br/>123/15 127/2 148/18<br/>176/8 186/4 192/12<br/><b>about [122]</b> 1/19 3/8<br/>5/24 6/7 6/21 7/3 7/17<br/>7/17 7/25 8/4 12/1<br/>12/3 13/3 14/5 14/5<br/>17/4 20/5 20/18 20/23<br/>21/14 22/12 24/21<br/>24/24 27/7 30/6 30/8<br/>38/14 39/24 45/17<br/>45/18 49/25 50/9<br/>50/14 56/10 57/19<br/>58/5 58/15 59/4 59/11<br/>59/15 59/16 59/21<br/>60/13 62/17 63/6 64/3<br/>64/20 68/24 72/14<br/>72/20 72/22 80/18<br/>82/5 84/7 85/21 86/11<br/>86/16 86/21 89/7<br/>89/11 89/22 92/11<br/>93/5 94/9 95/2 95/4<br/>101/7 105/6 109/15<br/>109/19 112/20 114/23<br/>117/3 117/13 119/15<br/>119/21 119/24 120/1<br/>120/2 122/19 130/6<br/>132/22 132/23 134/22<br/>137/24 138/6 139/10<br/>139/13 139/14 139/17<br/>139/25 144/22 145/14<br/>147/15 147/25 151/1<br/>158/20 160/1 161/17<br/>162/7 164/12 165/7<br/>171/6 174/4 174/16<br/>174/20 174/23 176/11<br/>177/24 180/17 181/17<br/>184/2 191/1 191/25<br/>196/4 196/5 196/10<br/>196/16 199/20 200/4<br/>201/7 202/10<br/><b>above [9]</b> 71/18 83/4<br/>83/14 83/20 84/12<br/>98/5 145/13 150/6<br/>151/15<br/><b>abrogated [1]</b> 87/16<br/><b>absence [2]</b> 147/7<br/>172/25<br/><b>abuse [1]</b> 156/17<br/><b>accept [1]</b> 17/22<br/><b>acceptance [1]</b> 9/14<br/><b>accepted [2]</b> 25/10<br/>32/9<br/><b>access [8]</b> 74/2</p> |
|---|---|---|--|---|

|          |   |  |  |   |
|----------|---|--|--|---|
| <b>A</b> | 160/14 160/15 166/10<br>166/14 166/16 167/25<br>171/19 190/13 192/8<br>194/15 194/22<br><b>add [1]</b> 199/6<br><b>added [2]</b> 154/24<br>190/10<br><b>addition [1]</b> 98/9<br><b>additional [3]</b> 99/4<br>143/5 144/6<br><b>addressed [1]</b> 22/25<br><b>addressees [1]</b><br>159/13<br><b>adherence [1]</b> 7/25<br><b>adjourned [1]</b> 203/11<br><b>Adjournment [1]</b><br>120/8<br><b>admitted [1]</b> 78/11<br><b>adopted [1]</b> 156/21<br><b>adverse [9]</b> 156/21<br>157/4 157/6 158/15<br>159/21 161/3 161/4<br>161/7 166/8<br><b>adversely [1]</b> 80/25<br><b>advice [43]</b> 6/13<br>19/24 22/24 22/25<br>23/3 23/25 25/10<br>26/14 27/5 27/11 31/6<br>31/7 32/6 32/9 39/3<br>49/19 50/7 50/8 54/25<br>56/4 57/11 58/2 58/5<br>58/7 58/15 59/4 59/11<br>59/16 59/21 77/15<br>84/7 84/16 85/14<br>85/17 85/20 87/12<br>102/12 122/18 122/25<br>124/2 172/18 183/17<br>183/20<br><b>Advices [1]</b> 56/7<br><b>advise [6]</b> 26/17<br>27/18 47/18 85/9<br>134/6 200/20<br><b>advised [4]</b> 23/14<br>28/24 32/7 151/22<br><b>advises [1]</b> 87/14<br><b>advising [3]</b> 47/7<br>77/6 123/22<br><b>advisor [2]</b> 120/24<br>122/10<br><b>affect [4]</b> 81/1 111/12<br>112/2 112/13<br><b>affected [1]</b> 148/7<br><b>after [15]</b> 2/23 11/25<br>12/15 77/14 89/3<br>89/15 93/3 124/13<br>130/7 136/25 137/24<br>149/23 191/24 196/8<br>201/3<br><b>afternoon [3]</b> 120/10<br>162/10 162/18<br><b>again [33]</b> 4/21 38/11<br>39/11 39/15 39/16<br>40/1 40/10 40/17 41/4<br>43/18 50/13 55/23 | 67/12 71/24 78/24<br>79/1 86/20 88/2 94/15<br>111/11 129/24 130/10<br>136/5 136/17 141/21<br>142/15 149/1 165/23<br>172/25 182/25 183/11<br>194/3 203/6<br><b>against [16]</b> 2/10<br>23/11 95/18 100/11<br>101/12 101/24 102/7<br>103/15 104/11 119/3<br>123/24 157/18 188/15<br>188/17 194/12 194/20<br><b>Age [2]</b> 137/25 138/2<br><b>Agency [1]</b> 9/9<br><b>agents [1]</b> 189/17<br><b>ago [1]</b> 53/2<br><b>agree [23]</b> 31/19<br>62/20 62/23 63/15<br>64/1 70/18 81/2 83/6<br>99/23 100/19 102/4<br>109/11 110/8 111/24<br>129/15 130/8 137/2<br>139/16 140/14 148/5<br>159/25 169/16 170/7<br><b>agreed [6]</b> 32/11<br>81/23 111/9 150/4<br>154/2 160/21<br><b>agreement [2]</b><br>138/15 151/15<br><b>AH [3]</b> 150/8 150/9<br>180/17<br><b>Alan [1]</b> 16/25<br><b>albeit [1]</b> 24/12<br><b>alerted [1]</b> 200/24<br><b>alerting [1]</b> 200/7<br><b>all [95]</b> 8/4 8/9 8/25<br>10/12 12/21 14/25<br>15/10 15/14 23/17<br>23/18 23/19 23/24<br>25/14 26/9 28/25<br>33/15 50/18 52/3<br>55/17 55/24 56/18<br>57/17 57/19 59/24<br>63/6 68/5 70/15 70/25<br>80/14 80/24 81/6 82/2<br>82/16 84/12 86/6<br>86/17 89/14 93/14<br>93/16 95/24 96/7<br>96/10 97/12 98/16<br>100/22 101/25 102/8<br>103/19 104/16 104/22<br>107/6 108/21 109/3<br>109/24 111/1 114/16<br>114/18 117/4 119/8<br>120/3 124/16 127/14<br>133/7 139/10 144/4<br>146/16 146/21 147/15<br>154/25 158/14 161/4<br>162/11 164/7 164/8<br>169/17 171/11 179/10<br>179/25 181/7 181/10<br>183/9 183/14 183/18<br>186/11 186/14 188/15 | 191/22 194/20 195/4<br>196/10 196/16 197/8<br>197/10 197/17 203/9<br><b>all' [1]</b> 85/5<br><b>allegation [2]</b> 101/11<br>101/24<br><b>allegations [2]</b> 26/23<br>80/17<br><b>alleged [1]</b> 157/8<br><b>allegedly [1]</b> 26/19<br><b>Allen [2]</b> 143/14<br>195/3<br><b>allow [1]</b> 127/23<br><b>allowed [3]</b> 72/10<br>72/13 165/19<br><b>almost [2]</b> 132/20<br>172/10<br><b>alone [2]</b> 46/8 85/11<br><b>along [4]</b> 33/23 37/6<br>106/8 178/8<br><b>already [8]</b> 28/24<br>29/25 77/24 138/15<br>154/6 182/19 183/3<br>198/19<br><b>Alresford [1]</b> 121/5<br><b>also [27]</b> 2/14 5/14<br>5/19 12/8 50/3 57/2<br>84/8 94/8 110/8 128/8<br>128/21 130/11 133/14<br>142/24 143/5 143/15<br>157/10 159/12 165/4<br>171/5 171/13 176/10<br>178/1 179/24 192/11<br>195/21 200/19<br><b>alter [1]</b> 99/21<br><b>alteration [1]</b> 57/9<br><b>alternative [3]</b><br>133/19 157/4 160/23<br><b>Alternatively [1]</b><br>156/18<br><b>although [6]</b> 150/22<br>171/8 172/14 177/3<br>179/18 199/4<br><b>always [9]</b> 83/23 96/6<br>125/2 148/13 156/2<br>156/4 168/12 183/18<br>183/21<br><b>am [9]</b> 1/2 7/16 26/17<br>64/11 64/13 121/7<br>158/2 182/20 203/11<br><b>amongst [7]</b> 46/2<br>53/23 72/18 89/21<br>168/19 168/22 175/17<br><b>amount [10]</b> 7/8<br>87/16 88/3 88/7 88/10<br>142/10 183/2 189/8<br>189/11 190/6<br><b>Amy [1]</b> 118/13<br><b>analyse [1]</b> 101/25<br><b>analysed [1]</b> 101/4<br><b>analysing [1]</b> 101/8<br><b>analysis [2]</b> 175/4<br>187/22<br><b>analysts [1]</b> 15/7 | <b>analytical [1]</b> 14/23<br><b>Andrew [9]</b> 37/20<br>37/21 39/12 39/12<br>49/2 49/21 49/25<br>141/24 142/22<br><b>Andrew Wise [2]</b><br>39/12 39/12<br><b>Andy [7]</b> 58/8 58/8<br>90/6 142/1 142/3<br>142/3 150/10<br><b>Angela [1]</b> 80/9<br><b>Angles [1]</b> 167/15<br><b>another [11]</b> 12/7<br>18/9 18/11 20/8 24/24<br>33/14 62/7 62/24<br>106/7 114/5 138/20<br><b>answer [10]</b> 2/4 2/7<br>2/21 2/21 3/1 24/7<br>35/18 67/8 69/5<br>152/10<br><b>answering [1]</b> 203/1<br><b>answers [1]</b> 168/13<br><b>Anti [1]</b> 5/16<br><b>Anti-Money [1]</b> 5/16<br><b>anticipate [1]</b> 123/14<br><b>any [128]</b> 2/5 2/15<br>2/18 2/19 3/7 7/6 9/13<br>10/24 11/6 11/9 12/14<br>13/4 16/8 16/9 17/6<br>17/14 18/10 20/10<br>22/18 28/2 29/15<br>34/14 34/16 34/23<br>35/5 37/3 37/5 37/16<br>37/23 42/21 49/24<br>52/1 53/4 54/13 54/19<br>55/25 57/8 58/18<br>59/19 61/13 66/8<br>66/17 66/23 67/7<br>77/11 81/18 82/22<br>82/24 83/3 83/13 84/3<br>90/25 91/17 95/15<br>96/2 96/10 97/4 99/6<br>99/7 99/11 99/13<br>99/22 111/13 111/22<br>112/1 112/6 112/13<br>112/20 115/2 116/9<br>116/15 116/20 122/10<br>123/10 123/16 127/18<br>129/10 129/12 131/14<br>132/11 134/24 135/7<br>137/13 138/13 141/18<br>142/10 143/5 144/21<br>147/7 148/3 148/14<br>153/9 154/4 155/3<br>155/22 157/17 160/1<br>160/10 164/19 165/2<br>165/11 167/2 167/4<br>167/22 169/5 169/9<br>170/23 171/6 171/7<br>171/9 172/25 173/22<br>174/4 174/5 174/8<br>180/22 182/15 183/15<br>191/17 194/18 199/7<br>199/8 199/10 199/17 |
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|   |   |   |  |  |
|---|---|---|--|--|
| <b>A</b>  | <b>appropriately [1]</b> 99/24  | 58/13 69/13 77/7<br>112/19 112/19 117/13<br>122/1 123/17 124/13<br>145/14 179/5 180/25<br>181/17 191/1  | 173/8 173/11 174/17<br>175/16 177/9 177/15<br>178/8 178/17 179/2<br>179/4 180/12 181/12<br>181/25 185/3 186/15<br>186/18 188/8 190/15<br>190/20 191/16 191/16<br>191/25 192/8 192/9<br>193/9 193/13 194/19<br>195/25 199/12 199/17<br>200/22 200/22  | <b>attach [1]</b> 57/18<br><b>attached [4]</b> 81/16<br>94/8 143/23 144/6<br><b>attaching [2]</b> 84/14<br>94/1<br><b>attachment [1]</b><br>122/20<br><b>attacks [2]</b> 123/24<br>174/21<br><b>attempt [1]</b> 141/5<br><b>attend [7]</b> 24/4 24/9<br>75/9 79/24 89/24<br>94/20 184/25<br><b>attendance [11]</b><br>32/21 32/24 41/4 41/7<br>42/5 78/4 78/24 97/23<br>97/24 98/10 185/9<br><b>attended [5]</b> 22/18<br>23/7 24/12 185/3<br>186/6<br><b>attendeo [3]</b> 92/7<br>92/8 188/8<br><b>attendeos [2]</b> 185/13<br>188/7<br><b>attending [6]</b> 24/6<br>51/25 89/19 98/24<br>186/11 186/14<br><b>attention [2]</b> 174/19<br>200/25<br><b>attitude [4]</b> 113/3<br>130/15 130/20 173/7<br><b>Attorney [1]</b> 95/9<br><b>attributed [2]</b> 35/4<br>36/23<br><b>audience [1]</b> 87/7<br><b>audit [13]</b> 125/22<br>127/3 127/24 128/6<br>129/6 129/8 130/4<br>131/23 132/3 133/13<br>138/14 140/1 167/15<br><b>audited [2]</b> 113/19<br>114/21<br><b>auditing [1]</b> 119/2<br><b>auditors [2]</b> 138/22<br>170/25<br><b>August [28]</b> 23/1<br>23/4 35/11 41/1 41/8<br>46/24 50/6 50/8 51/22<br>57/2 60/2 60/9 60/10<br>61/4 78/5 78/24 80/2<br>86/3 86/15 88/25 89/6<br>90/3 92/4 92/7 101/6<br>167/8 167/10 201/4<br><b>August 2013 [2]</b> 80/2<br>101/6<br><b>Aujard [1]</b> 190/23<br><b>authorisation [1]</b><br>194/21<br><b>authorise [2]</b> 140/15<br>182/22<br><b>authorised [5]</b><br>182/24 192/16 192/20<br>193/1 194/13<br><b>authorising [1]</b> |
| <b>any... [4]</b> 200/3<br>200/20 202/8 202/13<br><b>anybody [1]</b> 166/16<br><b>anyone [17]</b> 59/7<br>59/14 72/9 72/13 85/3<br>119/21 120/1 154/15<br>161/6 162/2 163/22<br>164/4 166/9 166/19<br>166/22 166/24 167/2<br><b>anything [25]</b> 20/23<br>45/14 45/18 57/22<br>57/23 78/16 79/7<br>79/19 83/19 86/11<br>93/12 109/14 114/13<br>130/12 130/17 131/2<br>131/4 131/10 132/25<br>148/14 168/1 177/10<br>196/5 197/5 201/6<br><b>Anyway [1]</b> 38/5<br><b>apologies [4]</b> 90/12<br>94/3 114/1 202/17<br><b>apparently [2]</b> 18/5<br>195/24<br><b>appeal [7]</b> 29/11<br>29/12 29/14 157/15<br>157/16 157/16 171/13<br><b>appear [1]</b> 175/22<br><b>appears [8]</b> 35/15<br>50/24 51/5 76/20<br>123/18 153/2 160/8<br>172/17<br><b>appendices [1]</b> 104/7<br><b>applicable [3]</b> 74/3<br>144/11 155/7<br><b>applied [1]</b> 63/5<br><b>applies [2]</b> 82/16<br>84/9<br><b>apply [3]</b> 86/19 86/22<br>90/17<br><b>applying [1]</b> 178/16<br><b>appoint [1]</b> 97/15<br><b>appointed [5]</b> 26/6<br>51/17 98/14 98/17<br>125/10<br><b>appointment [1]</b><br>136/10<br><b>appraised [1]</b> 155/2<br><b>appreciate [3]</b> 83/22<br>153/21 153/25<br><b>appreciating [1]</b><br>183/1<br><b>approach [13]</b> 14/20<br>14/23 14/24 15/15<br>17/3 75/15 86/4<br>103/12 104/21 125/17<br>129/20 139/21 187/13<br><b>appropriate [17]</b> 3/10<br>15/20 15/23 29/14<br>75/14 79/6 79/15 85/6<br>89/24 95/23 115/7<br>120/3 131/16 162/9<br>165/2 178/17 179/10 | <b>approval [1]</b> 140/7<br><b>approved [1]</b> 194/23<br><b>approximately [1]</b><br>150/21<br><b>April [1]</b> 191/23<br><b>are [108]</b> 2/18 3/3<br>3/25 4/18 5/19 15/11<br>24/15 27/16 28/19<br>29/4 32/24 44/22<br>44/25 57/20 58/2 58/3<br>60/21 60/22 63/13<br>65/21 69/3 69/8 69/16<br>75/4 80/15 81/21 82/4<br>83/2 84/10 84/22<br>84/24 85/8 86/12<br>87/23 89/9 90/15 92/3<br>92/8 94/10 94/20<br>95/23 96/8 96/13<br>96/19 96/19 96/20<br>97/2 97/21 98/2 98/4<br>104/11 104/23 107/4<br>109/7 109/23 109/23<br>110/1 111/5 111/22<br>118/3 118/16 119/23<br>121/7 121/9 122/12<br>125/6 128/12 130/7<br>130/11 131/14 135/22<br>138/14 138/22 138/25<br>139/2 139/5 140/24<br>145/14 145/16 145/23<br>146/16 146/20 150/22<br>151/11 154/15 155/7<br>156/2 156/5 156/7<br>156/14 161/22 164/22<br>168/17 169/17 170/14<br>174/18 180/2 182/18<br>187/23 189/3 195/23<br>197/1 198/16 198/25<br>199/8 200/20 200/23<br>202/20<br><b>area [6]</b> 120/25 139/2<br>140/24 149/19 164/18<br>186/23<br><b>areas [3]</b> 10/23 56/10<br>165/15<br><b>aren't [4]</b> 72/10 72/13<br>172/13 192/24<br><b>arguable [1]</b> 29/11<br><b>arguably [1]</b> 28/10<br><b>argue [1]</b> 156/14<br><b>argument [3]</b> 124/25<br>125/3 128/2<br><b>arguments [1]</b><br>127/10<br><b>arise [1]</b> 81/22<br><b>arises [2]</b> 3/6 20/20<br><b>arising [1]</b> 81/13<br><b>arose [2]</b> 9/19 198/23<br><b>around [26]</b> 7/20<br>8/25 12/3 14/5 14/10<br>22/12 22/17 34/14<br>43/4 45/15 49/14 58/3 | <b>ARQ [6]</b> 198/16 199/1<br>199/15 199/21 199/23<br>200/14<br><b>ARQs [1]</b> 200/20<br><b>arrange [1]</b> 136/8<br><b>article [3]</b> 122/3<br>143/23 144/7<br><b>articles [3]</b> 137/24<br>138/1 138/5<br><b>as [194]</b> 1/10 2/10<br>3/3 5/15 6/6 8/8 9/8<br>9/8 9/13 9/15 10/22<br>11/23 12/4 12/4 12/12<br>12/12 13/12 14/15<br>15/7 16/1 16/3 18/20<br>18/20 19/6 21/8 21/22<br>23/16 25/12 25/23<br>26/14 27/15 27/23<br>27/24 28/17 28/25<br>32/16 32/20 32/24<br>33/23 34/17 35/3 38/8<br>38/12 38/21 39/10<br>40/6 40/17 42/5 42/9<br>43/15 46/23 47/7<br>47/18 49/12 52/13<br>53/17 54/16 55/1<br>58/18 60/8 60/17<br>60/22 62/11 62/11<br>63/14 63/19 73/9 73/9<br>73/11 73/11 73/13<br>73/13 73/14 74/3<br>74/14 74/15 74/19<br>74/19 75/1 75/10<br>75/23 79/3 80/15 81/8<br>81/8 81/14 83/8 83/16<br>84/4 84/11 85/25 86/3<br>89/4 91/4 92/13 92/25<br>93/16 95/13 96/5<br>96/12 98/2 103/4<br>104/15 106/4 106/6<br>106/6 107/2 109/13<br>111/8 111/18 111/20<br>111/20 113/6 116/23<br>123/19 124/17 124/24<br>124/25 124/25 125/9<br>128/1 128/11 128/19<br>130/12 133/24 134/17<br>136/3 139/7 141/8<br>142/13 142/13 142/25<br>143/15 144/8 144/16<br>145/23 146/1 147/11<br>149/25 151/21 152/23<br>153/13 153/14 154/9<br>154/9 155/5 155/5<br>155/25 156/4 156/11<br>156/22 158/4 160/3<br>160/20 161/1 164/8<br>168/15 169/15 170/9<br>171/23 171/25 172/15 | <b>ask [12]</b> 1/11 1/18<br>30/22 31/6 53/3<br>118/17 124/14 165/7<br>168/12 168/13 195/12<br>195/13<br><b>asked [20]</b> 7/25<br>26/17 28/1 33/25 34/2<br>50/14 54/11 55/9<br>60/18 64/20 115/4<br>142/4 150/20 156/19<br>180/25 182/13 184/9<br>191/9 191/12 199/25<br><b>asking [14]</b> 7/16 7/23<br>20/18 42/21 43/4<br>45/15 45/17 45/18<br>47/17 68/24 124/2<br>147/14 183/24 196/8<br><b>asks [1]</b> 2/19<br><b>aspect [1]</b> 99/7<br><b>assess [1]</b> 169/18<br><b>assessed [1]</b> 190/5<br><b>assessment [3]</b> 87/1<br>87/9 87/9<br><b>asset [2]</b> 188/14<br>189/23<br><b>assets [2]</b> 189/1<br>189/9<br><b>assist [8]</b> 1/15 3/6<br>7/12 58/18 95/15<br>110/8 135/19 144/12<br><b>assistance [1]</b><br>135/16<br><b>assists [1]</b> 80/3<br><b>associated [2]</b> 97/4<br>99/7<br><b>assume [5]</b> 42/11<br>43/2 69/10 79/1<br>178/13<br><b>assumed [2]</b> 17/14<br>178/22<br><b>assumption [2]</b><br>178/19 196/22<br><b>assumptions [1]</b><br>75/22<br><b>assurance [6]</b> 135/5<br>137/19 192/4 193/6<br>194/12 194/21<br><b>assured [3]</b> 192/8<br>192/25 194/23<br><b>assurer [1]</b> 191/16<br><b>assuring [1]</b> 193/14<br><b>at [233]</b> |  |

|   |  |   |  |   |
|---|--|---|--|---|
| <b>A</b>  | <b>barrister [3]</b> 21/16<br>21/21 87/21  | 124/15 125/23 126/9<br>127/25 130/14 145/12<br>148/9 148/21 151/9<br>154/6 154/10 154/24<br>155/11 156/1 156/3<br>156/4 158/18 160/5<br>161/15 161/21 161/22<br>161/25 162/6 162/25<br>163/7 166/5 166/13<br>166/20 166/24 167/4<br>167/18 167/24 171/21<br>173/11 173/16 178/14<br>180/15 181/20 182/3<br>182/19 183/3 187/24<br>189/4 189/10 189/23<br>191/18 192/11 193/8<br>193/25 194/2 194/23<br>194/23   | 41/21 41/23 144/20<br>144/25 168/5<br><b>beliefs [2]</b> 145/9<br>146/18<br><b>believe [33]</b> 16/15<br>16/16 16/17 27/6 27/8<br>31/4 31/7 31/14 34/5<br>42/3 57/18 63/10<br>66/15 66/22 81/15<br>92/11 108/20 115/11<br>124/23 125/6 127/23<br>133/12 134/15 135/9<br>149/18 167/18 168/3<br>180/7 180/12 181/5<br>181/17 183/5 185/2<br><b>bell [1]</b> 197/25<br><b>below [15]</b> 75/11<br>81/14 82/5 90/15<br>97/13 97/17 97/20<br>97/22 98/1 144/7<br>150/3 155/6 155/13<br>188/20 200/13<br><b>beneficial [1]</b> 123/13<br><b>benefit [4]</b> 139/18<br>189/12 190/1 190/4<br><b>Benefits [1]</b> 9/9<br><b>best [12]</b> 4/1 4/19<br>76/4 91/3 91/14 96/18<br>100/24 100/25 128/1<br>133/13 133/22 164/8<br><b>bet [1]</b> 133/22<br><b>better [4]</b> 138/8<br>143/4 145/3 158/6<br><b>between [17]</b> 5/1<br>5/25 8/17 9/5 10/24<br>12/14 13/25 14/11<br>20/10 35/9 77/13<br>118/5 159/9 168/8<br>168/18 168/22 174/16<br><b>beyond [2]</b> 27/16<br>168/13<br><b>big [3]</b> 133/21 136/11<br>137/21<br><b>bill [1]</b> 138/19<br><b>bit [20]</b> 11/24 14/6<br>14/8 30/6 30/7 44/7<br>110/14 110/14 118/19<br>120/22 120/23 128/15<br>129/23 135/17 144/13<br>145/18 163/19 169/8<br>170/8 196/20<br><b>bits [1]</b> 94/6<br><b>blame [3]</b> 58/4 58/14<br>59/4<br><b>blank [1]</b> 154/21<br><b>blind [1]</b> 141/25<br><b>blitz [4]</b> 187/15<br>187/15 187/17 187/19<br><b>board [9]</b> 140/6<br>140/12 140/13 184/15<br>184/15 184/16 190/16<br>190/18 191/19<br><b>Bodmin [1]</b> 48/6<br><b>body [3]</b> 140/7   | 140/17 159/1<br><b>Bogerd [1]</b> 80/10<br><b>bold [5]</b> 109/6 109/10<br>110/11 111/4 111/7<br><b>Bond [8]</b> 37/22 37/24<br>38/3 38/5 49/21 49/25<br>98/12 98/14<br><b>boss [4]</b> 115/4<br>118/14 159/17 162/3<br><b>both [14]</b> 2/1 42/6<br>70/14 74/6 74/22 88/3<br>111/19 121/8 133/15<br>153/25 155/7 170/14<br>170/17 187/6<br><b>bottom [5]</b> 25/21<br>80/5 106/17 106/19<br>167/14<br><b>boundaries [1]</b> 15/10<br><b>boxes [1]</b> 194/20<br><b>brakes [1]</b> 159/17<br><b>branch [14]</b> 10/12<br>15/8 48/5 82/13 93/25<br>121/5 123/16 124/3<br>128/6 128/10 136/22<br>168/9 199/25 201/24<br><b>branches [3]</b> 10/9<br>26/22 82/6<br><b>Brander [2]</b> 141/25<br>143/11<br><b>breach [5]</b> 27/22<br>28/17 87/17 87/21<br>113/21<br><b>breaches [2]</b> 87/18<br>88/3<br><b>break [6]</b> 64/7 64/12<br>119/17 119/22 162/10<br>162/16<br><b>brief [13]</b> 35/15 36/5<br>55/19 61/7 62/14 68/7<br>68/14 69/1 70/4 72/8<br>150/4 162/3 196/20<br><b>briefed [10]</b> 25/2<br>25/5 36/5 39/24 69/17<br>70/15 73/2 119/4<br>125/13 127/25<br><b>briefing [3]</b> 25/6<br>48/21 83/22<br><b>briefly [1]</b> 94/24<br><b>bring [8]</b> 25/14 50/18<br>73/8 73/10 73/12<br>74/14 74/18 179/14<br><b>bringing [2]</b> 59/9<br>103/14<br><b>broader [4]</b> 87/6 87/7<br>87/10 91/18<br><b>brought [4]</b> 73/15<br>143/24 174/25 195/13<br><b>bugs [9]</b> 23/19 24/22<br>28/20 29/7 29/18<br>147/25 148/3 148/5<br>163/7<br><b>built [1]</b> 75/15<br><b>bullet [1]</b> 143/9<br><b>bundle [5]</b> 103/18 |
| <b>authorising... [1]</b><br>193/15<br><b>authority [1]</b> 153/15<br><b>available [12]</b> 38/16<br>45/3 47/10 51/11 55/5<br>56/3 65/11 77/9 80/19<br>95/24 133/8 189/8<br><b>avoid [8]</b> 63/4 72/21<br>76/22 88/9 88/18<br>157/4 161/3 161/4<br><b>avoided [2]</b> 70/10<br>88/2<br><b>awarded [1]</b> 189/11<br><b>aware [47]</b> 9/2 9/9<br>9/13 9/19 9/24 18/20<br>19/10 35/2 40/5 54/19<br>55/24 58/24 59/7<br>59/14 69/18 74/5<br>74/12 80/15 87/23<br>87/24 105/23 106/6<br>119/20 121/7 121/12<br>121/15 121/16 121/20<br>121/21 122/7 122/11<br>126/2 126/9 132/12<br>132/25 143/13 148/3<br>148/9 154/14 154/15<br>161/21 162/25 163/7<br>170/14 174/8 179/16<br>198/25<br><b>away [1]</b> 68/13 | <b>based [5]</b> 35/14 88/6<br>94/6 139/12 196/12<br><b>basic [5]</b> 10/14 10/19<br>10/21 10/23 11/2<br><b>basis [15]</b> 96/21<br>127/16 151/10 158/5<br>159/6 161/10 161/16<br>162/4 165/13 166/5<br>166/20 176/14 177/18<br>177/22 178/3<br><b>BBC [1]</b> 122/7<br><b>be [333]</b><br><b>bear [1]</b> 199/11<br><b>bearing [1]</b> 113/5<br><b>became [7]</b> 11/9<br>11/14 52/13 148/1<br>162/2 185/15 196/2<br><b>because [65]</b> 10/18<br>18/4 30/4 31/23 35/19<br>39/1 41/24 42/1 45/5<br>51/3 51/23 52/3 54/16<br>56/1 62/5 64/1 65/3<br>65/9 67/10 67/15<br>67/18 68/7 68/9 69/1<br>69/3 69/8 70/4 70/5<br>70/13 73/25 76/20<br>79/2 87/6 91/17 93/8<br>94/24 101/23 102/20<br>109/23 112/8 117/15<br>119/12 121/15 121/20<br>121/21 136/15 146/23<br>149/1 158/14 159/18<br>159/21 160/12 161/21<br>168/2 170/11 180/21<br>182/1 192/12 193/17<br>193/19 193/25 194/9<br>196/24 198/22 200/2<br><b>become [4]</b> 33/14<br>75/12 87/23 126/2<br><b>becoming [1]</b> 121/15<br><b>Beddoe [2]</b> 73/7<br>73/15<br><b>been [118]</b> 9/10 9/24<br>10/19 11/1 16/16 18/5<br>18/6 18/7 19/23 26/24<br>28/15 28/20 29/5 29/6<br>30/4 30/13 31/17<br>31/20 31/22 35/8 38/1<br>40/21 42/3 44/11 45/2<br>45/2 45/3 45/8 52/16<br>52/18 52/21 54/25<br>56/16 56/25 59/2<br>60/13 64/2 65/1 65/7<br>67/1 68/18 69/15<br>69/25 70/1 71/10<br>71/11 73/5 77/12<br>77/22 79/12 89/20<br>90/18 90/24 93/13<br>95/22 100/17 100/20<br>100/24 101/11 102/12<br>112/18 115/4 117/25<br>119/4 121/23 122/20 | <b>BEER [9]</b> 1/9 1/11<br>1/21 3/15 119/25<br>168/20 202/22 203/7<br>204/4<br><b>before [22]</b> 1/18 2/13<br>17/7 17/10 20/5 22/17<br>41/13 64/5 83/18 85/4<br>96/2 100/3 100/13<br>106/3 123/8 127/20<br>129/13 148/1 193/3<br>196/5 201/21 202/11<br><b>beforehand [1]</b> 77/21<br><b>beg [1]</b> 171/13<br><b>begin [1]</b> 3/15<br><b>beginning [7]</b> 40/7<br>41/5 58/25 75/8<br>107/18 117/21 143/2<br><b>behalf [2]</b> 1/11 143/1<br><b>behaviour [1]</b> 199/6<br><b>behind [3]</b> 23/25 70/1<br>71/11<br><b>being [71]</b> 7/18 7/25<br>19/11 20/13 24/10<br>28/11 29/21 30/1 30/3<br>30/6 32/20 32/24<br>39/10 39/23 39/23<br>39/24 40/17 43/14<br>44/2 46/21 46/22<br>52/14 53/5 54/19<br>55/21 55/25 59/8<br>60/21 60/23 63/1<br>70/14 70/15 70/16<br>74/11 74/12 86/23<br>88/1 89/7 100/15<br>100/23 105/11 111/21<br>121/13 124/3 128/15<br>140/10 144/3 147/2<br>147/11 156/9 163/8<br>165/13 170/23 172/24<br>175/6 179/20 179/23<br>179/24 180/21 180/25<br>183/25 186/22 188/15<br>188/22 189/2 189/8<br>192/15 192/23 192/24<br>193/13 194/19<br><b>belief [7]</b> 4/2 4/19   |  |   |
| <b>B</b>  | <b>BA [1]</b> 137/4<br><b>back [34]</b> 17/2 25/21<br>26/9 26/15 31/5 33/22<br>39/2 39/20 44/25 72/9<br>80/2 87/11 89/3 90/25<br>96/13 99/19 107/24<br>108/11 108/11 120/18<br>120/20 124/18 126/24<br>129/24 133/17 135/13<br>142/20 151/3 155/16<br>159/16 161/25 171/19<br>173/9 176/2<br><b>back-up [2]</b> 96/13<br>99/19<br><b>background [12]</b> 5/9<br>5/10 7/3 7/16 18/20<br>89/21 108/4 108/8<br>122/15 123/24 128/17<br>131/16<br><b>backwards [1]</b><br>169/24<br><b>badge [1]</b> 85/24<br><b>BAE [1]</b> 175/11<br><b>Baker [1]</b> 73/6<br><b>balance [1]</b> 99/13<br><b>balancing [1]</b> 163/10<br><b>Ballan [2]</b> 120/24<br>122/24<br><b>bank [1]</b> 189/10<br><b>banking [1]</b> 128/18   | <b>212/15 212/23 212/9</b><br><b>212/25 213/14 214/12</b><br><b>214/9 214/21 215/9</b><br><b>215/6 215/10 215/24</b><br><b>215/11 216/1 216/3</b><br><b>216/4 218/18 216/5</b><br><b>216/15 216/21 216/22</b><br><b>216/25 216/26 216/25</b><br><b>216/37 216/5 216/13</b><br><b>216/20 216/24 216/74</b><br><b>216/18 216/24 217/21</b><br><b>217/11 217/16 218/14</b><br><b>218/15 218/20 218/3</b><br><b>218/19 218/3 218/24</b><br><b>218/94 218/10 218/23</b><br><b>219/18 219/11 219/8</b><br><b>219/25 219/2 219/23</b><br><b>219/23</b><br><b>BEER [9]</b> 1/9 1/11<br><b>1/21 3/15 119/25</b><br><b>168/20 202/22 203/7</b><br><b>204/4</b><br><b>before [22]</b> 1/18 2/13<br><b>17/7 17/10 20/5 22/17</b><br><b>41/13 64/5 83/18 85/4</b><br><b>96/2 100/3 100/13</b><br><b>106/3 123/8 127/20</b><br><b>129/13 148/1 193/3</b><br><b>196/5 201/21 202/11</b><br><b>beforehand [1]</b> 77/21<br><b>beg [1]</b> 171/13<br><b>begin [1]</b> 3/15<br><b>beginning [7]</b> 40/7<br><b>41/5 58/25 75/8</b><br><b>107/18 117/21 143/2</b><br><b>behalf [2]</b> 1/11 143/1<br><b>behaviour [1]</b> 199/6<br><b>behind [3]</b> 23/25 70/1<br><b>71/11</b><br><b>being [71]</b> 7/18 7/25<br><b>19/11 20/13 24/10</b><br><b>28/11 29/21 30/1 30/3</b><br><b>30/6 32/20 32/24</b><br><b>39/10 39/23 39/23</b><br><b>39/24 40/17 43/14</b><br><b>44/2 46/21 46/22</b><br><b>52/14 53/5 54/19</b><br><b>55/21 55/25 59/8</b><br><b>60/21 60/23 63/1</b><br><b>70/14 70/15 70/16</b><br><b>74/11 74/12 86/23</b><br><b>88/1 89/7 100/15</b><br><b>100/23 105/11 111/21</b><br><b>121/13 124/3 128/15</b><br><b>140/10 144/3 147/2</b><br><b>147/11 156/9 163/8</b><br><b>165/13 170/23 172/24</b><br><b>175/6 179/20 179/23</b><br><b>179/24 180/21 180/25</b><br><b>183/25 186/22 188/15</b><br><b>188/22 189/2 189/8</b><br><b>192/15 192/23 192/24</b><br><b>193/13 194/19</b><br><b>belief [7]</b> 4/2 4/19 | <b>140/17 159/1</b><br><b>Bogerd [1]</b> 80/10<br><b>bold [5]</b> 109/6 109/10<br><b>110/11 111/4 111/7</b><br><b>Bond [8]</b> 37/22 37/24<br><b>38/3 38/5 49/21 49/25</b><br><b>98/12 98/14</b><br><b>boss [4]</b> 115/4<br><b>118/14 159/17 162/3</b><br><b>both [14]</b> 2/1 42/6<br><b>70/14 74/6 74/22 88/3</b><br><b>111/19 121/8 133/15</b><br><b>153/25 155/7 170/14</b><br><b>170/17 187/6</b><br><b>bottom [5]</b> 25/21<br><b>80/5 106/17 106/19</b><br><b>167/14</b><br><b>boundaries [1]</b> 15/10<br><b>boxes [1]</b> 194/20<br><b>brakes [1]</b> 159/17<br><b>branch [14]</b> 10/12<br><b>15/8 48/5 82/13 93/25</b><br><b>121/5 123/16 124/3</b><br><b>128/6 128/10 136/22</b><br><b>168/9 199/25 201/24</b><br><b>branches [3]</b> 10/9<br><b>26/22 82/6</b><br><b>Brander [2]</b> 141/25<br><b>143/11</b><br><b>breach [5]</b> 27/22<br><b>28/17 87/17 87/21</b><br><b>113/21</b><br><b>breaches [2]</b> 87/18<br><b>88/3</b><br><b>break [6]</b> 64/7 64/12<br><b>119/17 119/22 162/10</b><br><b>162/16</b><br><b>brief [13]</b> 35/15 36/5<br><b>55/19 61/7 62/14 68/7</b><br><b>68/14 69/1 70/4 72/8</b><br><b>150/4 162/3 196/20</b><br><b>briefed [10]</b> 25/2<br><b>25/5 36/5 39/24 69/17</b><br><b>70/15 73/2 119/4</b><br><b>125/13 127/25</b><br><b>briefing [3]</b> 25/6<br><b>48/21 83/22</b><br><b>briefly [1]</b> 94/24<br><b>bring [8]</b> 25/14 50/18<br><b>73/8 73/10 73/12</b><br><b>74/14 74/18 179/14</b><br><b>bringing [2]</b> 59/9<br><b>103/14</b><br><b>broader [4]</b> 87/6 87/7<br><b>87/10 91/18</b><br><b>brought [4]</b> 73/15<br><b>143/24 174/25 195/13</b><br><b>bugs [9]</b> 23/19 24/22<br><b>28/20 29/7 29/18</b><br><b>147/25 148/3 148/5</b><br><b>163/7</b><br><b>built [1]</b> 75/15<br><b>bullet [1]</b> 143/9<br><b>bundle [5]</b> 103/18 |   |

|  |  |   |  |  |
|--|--|---|--|--|
| <p><b>B</b></p> <p><b>bundle... [4]</b> 106/2<br/>122/5 126/13 132/15</p> <p><b>business [17]</b> 12/21<br/>13/9 13/11 61/9<br/>111/14 111/22 112/16<br/>113/1 123/9 123/23<br/>130/4 130/23 135/6<br/>157/3 161/3 175/5<br/>179/21</p> <p><b>businesses [1]</b> 161/4</p> <p><b>but [117]</b> 15/25 16/15<br/>16/17 17/25 18/20<br/>19/25 22/3 22/24 24/9<br/>25/4 27/11 27/21<br/>28/21 29/25 33/13<br/>34/25 35/3 35/19 36/6<br/>37/15 37/25 38/3<br/>38/21 39/11 40/3<br/>41/21 42/1 42/2 42/20<br/>43/4 43/9 43/23 44/24<br/>47/25 49/24 51/11<br/>53/2 54/22 56/23<br/>58/22 63/2 68/18<br/>68/23 69/18 72/24<br/>77/22 78/19 85/16<br/>86/24 87/9 88/24<br/>89/20 91/13 94/11<br/>94/13 94/19 94/25<br/>96/3 97/18 103/18<br/>105/14 106/2 112/12<br/>113/19 113/24 117/21<br/>119/5 119/11 119/23<br/>121/15 121/20 122/6<br/>123/13 123/20 124/11<br/>130/11 132/14 133/14<br/>135/9 136/17 138/12<br/>143/2 143/15 146/15<br/>147/2 147/11 153/7<br/>154/23 155/10 155/20<br/>157/7 158/18 160/16<br/>164/19 165/6 165/23<br/>166/13 167/19 169/20<br/>170/8 176/25 177/12<br/>177/15 180/6 181/4<br/>182/4 184/7 186/1<br/>187/21 189/22 190/1<br/>193/9 194/2 194/4<br/>195/20 197/11 202/17</p> <p><b>Byfield [1]</b> 139/6</p> <p><b>Byfleet [4]</b> 139/6<br/>143/14 195/24 197/2</p> | <p>60/11 60/18 60/19<br/>69/20 69/25 70/7<br/>71/10 71/20 72/2<br/>72/19 78/10 79/1 79/4<br/>79/5 79/10 79/17<br/>79/21 79/24 86/25<br/>89/5 89/8 89/12 90/2<br/>90/23 91/5 94/9 136/8<br/>138/25 141/11 144/16<br/>150/3 198/9 200/12</p> <p><b>call' [1]</b> 137/22</p> <p><b>called [12]</b> 21/12<br/>28/5 50/8 87/11 94/1<br/>103/16 118/15 125/14<br/>142/4 162/5 163/16<br/>197/22</p> <p><b>calling [1]</b> 30/8</p> <p><b>calls [15]</b> 15/17 26/2<br/>51/14 55/14 55/16<br/>55/24 60/12 69/15<br/>72/1 75/10 86/15<br/>86/16 86/20 89/13<br/>92/4</p> <p><b>came [6]</b> 17/2 21/8<br/>96/2 103/24 116/23<br/>146/2</p> <p><b>can [211]</b></p> <p><b>can't [74]</b> 7/1 8/13<br/>15/24 17/5 30/18<br/>30/22 45/21 47/25<br/>48/10 48/12 51/23<br/>58/22 66/5 67/13<br/>68/13 71/7 74/16<br/>74/20 77/16 78/18<br/>87/8 91/20 93/24<br/>103/8 115/15 129/11<br/>132/14 134/13 135/1<br/>136/14 136/17 138/10<br/>138/12 141/10 141/13<br/>141/14 141/20 146/7<br/>146/22 147/1 147/1<br/>148/25 153/17 158/13<br/>159/4 159/10 159/20<br/>159/23 160/12 160/25<br/>161/18 164/14 166/13<br/>166/18 167/1 167/6<br/>167/24 167/24 170/7<br/>172/14 180/23 181/20<br/>182/4 183/21 184/6<br/>184/8 185/3 185/5<br/>186/1 187/21 193/2<br/>193/2 200/3 202/18</p> <p><b>candidates [3]</b> 75/4<br/>130/11 138/22</p> <p><b>cannot [9]</b> 18/8 62/22<br/>63/16 63/18 65/2 65/5<br/>65/8 67/15 87/16</p> <p><b>capable [3]</b> 24/7<br/>109/24 130/12</p> <p><b>capital [1]</b> 66/11</p> <p><b>captured [4]</b> 68/5<br/>90/19 94/7 100/16</p> <p><b>captures [2]</b> 57/18<br/>99/24</p> | <p><b>capturing [1]</b> 100/17</p> <p><b>caravan [1]</b> 173/6</p> <p><b>Care [1]</b> 111/16</p> <p><b>career [1]</b> 4/23</p> <p><b>careful [4]</b> 76/24<br/>85/21 112/24 172/21</p> <p><b>carefully [3]</b> 83/18<br/>85/4 86/11</p> <p><b>Carol [2]</b> 120/24<br/>139/4</p> <p><b>Carole [1]</b> 195/22</p> <p><b>carried [1]</b> 125/1</p> <p><b>carries [1]</b> 31/10</p> <p><b>carry [4]</b> 36/15<br/>128/15 128/20 174/22</p> <p><b>carrying [2]</b> 156/15<br/>176/12</p> <p><b>Cartwright [19]</b> 18/7<br/>19/24 21/15 21/17<br/>21/21 22/5 26/4 36/20<br/>36/21 41/25 47/17<br/>51/16 57/13 59/12<br/>60/20 77/25 78/5<br/>98/13 181/12</p> <p><b>case [65]</b> 18/23<br/>29/14 31/24 45/8 51/5<br/>77/22 80/23 87/17<br/>95/16 95/17 102/25<br/>103/6 103/17 103/23<br/>104/2 104/6 104/20<br/>105/12 105/19 106/1<br/>106/9 106/14 107/3<br/>109/24 115/18 117/1<br/>118/15 119/1 119/6<br/>119/7 122/15 123/13<br/>124/16 125/3 125/4<br/>125/8 126/2 126/3<br/>127/2 127/15 127/19<br/>129/19 131/17 143/8<br/>144/10 148/21 150/21<br/>150/25 160/8 166/3<br/>169/23 179/6 179/25<br/>180/20 180/24 181/7<br/>183/8 183/9 183/13<br/>183/14 189/6 189/25<br/>196/21 196/23 197/15</p> <p><b>cases [40]</b> 28/4 29/5<br/>31/4 31/5 47/13 47/13<br/>121/7 121/12 122/12<br/>125/6 139/2 139/10<br/>140/24 142/5 142/8<br/>143/7 143/13 143/15<br/>143/19 148/18 150/17<br/>150/19 153/14 154/5<br/>155/4 155/5 156/12<br/>157/6 165/5 174/13<br/>179/6 181/11 183/23<br/>188/16 188/21 189/3<br/>196/11 196/16 197/8<br/>197/11</p> <p><b>cash [2]</b> 58/8 189/9</p> <p><b>Castleton [4]</b> 127/2<br/>127/7 127/19 129/19</p> <p><b>Castleton's [2]</b> 127/4</p> | <p>127/10</p> <p><b>catch [1]</b> 149/6</p> <p><b>categories [4]</b> 82/17<br/>82/21 82/22 99/4</p> <p><b>cause [8]</b> 14/24 92/2<br/>111/14 112/25 127/6<br/>165/3 166/3 201/9</p> <p><b>caused [3]</b> 124/24<br/>201/12 201/14</p> <p><b>caveats [2]</b> 170/17<br/>170/20</p> <p><b>cc'd [1]</b> 149/12</p> <p><b>ceased [1]</b> 181/6</p> <p><b>cent [4]</b> 104/17<br/>104/18 186/21 188/19</p> <p><b>central [9]</b> 23/15<br/>24/20 25/13 25/24<br/>32/8 56/11 56/14<br/>56/21 142/16</p> <p><b>centrally [4]</b> 25/16<br/>50/20 51/6 52/15</p> <p><b>certain [3]</b> 14/5 84/1<br/>102/4</p> <p><b>certainly [1]</b> 172/10</p> <p><b>certainty [1]</b> 199/7</p> <p><b>cessation [3]</b> 17/23<br/>19/20 45/19</p> <p><b>cetera [9]</b> 13/16<br/>15/17 84/23 99/22<br/>164/20 168/24 178/3<br/>187/25 196/13</p> <p><b>chain [15]</b> 12/14<br/>120/19 121/18 126/7<br/>126/16 126/21 132/2<br/>134/2 135/18 137/1<br/>141/23 144/3 151/8<br/>196/16 197/21</p> <p><b>chair [13]</b> 40/24<br/>53/17 54/17 60/18<br/>69/18 75/10 97/15<br/>97/16 97/19 97/21<br/>97/24 98/9 98/20</p> <p><b>chaired [2]</b> 60/21<br/>69/16</p> <p><b>chairing [5]</b> 34/8<br/>39/17 40/22 89/19<br/>91/5</p> <p><b>chairman [3]</b> 1/20<br/>173/18 185/12</p> <p><b>challenge [7]</b> 7/10<br/>29/13 65/17 67/17<br/>156/5 166/7 197/14</p> <p><b>challenged [7]</b> 66/6<br/>67/12 67/14 67/16<br/>114/25 121/14 148/23</p> <p><b>challenges [22]</b><br/>121/9 122/1 122/12<br/>137/10 137/19 139/22<br/>141/3 144/21 150/7<br/>150/18 150/22 151/20<br/>151/24 153/4 155/5<br/>156/1 156/2 156/24<br/>161/22 161/24 163/16<br/>164/13</p> | <p><b>challenging [5]</b> 8/8<br/>8/15 77/7 139/8 196/1</p> <p><b>chance [2]</b> 125/3<br/>128/1</p> <p><b>chances [1]</b> 84/13</p> <p><b>change [5]</b> 18/3<br/>123/6 133/25 166/7<br/>182/10</p> <p><b>changed [1]</b> 185/6</p> <p><b>channel [3]</b> 129/9<br/>165/3 166/3</p> <p><b>Channel 4 [2]</b> 165/3<br/>166/3</p> <p><b>channels [1]</b> 179/11</p> <p><b>chaps [2]</b> 57/6 57/20</p> <p><b>charge [4]</b> 11/19<br/>40/22 115/17 176/25</p> <p><b>charged [1]</b> 23/22</p> <p><b>charging [3]</b> 6/14<br/>6/19 6/21</p> <p><b>check [3]</b> 57/19 61/4<br/>191/4</p> <p><b>checks [1]</b> 106/1</p> <p><b>choice [1]</b> 22/5</p> <p><b>Chris [1]</b> 190/23</p> <p><b>Christmas [2]</b> 10/10<br/>10/17</p> <p><b>chronologically [1]</b><br/>21/5</p> <p><b>chronology [2]</b> 20/22<br/>89/4</p> <p><b>circulate [1]</b> 66/1</p> <p><b>circulated [22]</b> 34/25<br/>35/3 35/7 35/19 40/3<br/>43/9 43/23 46/2 46/21<br/>52/4 55/21 63/4 65/7<br/>65/14 69/22 72/4<br/>75/18 76/22 89/2<br/>90/19 91/11 105/24</p> <p><b>circulating [4]</b> 50/3<br/>90/16 91/9 94/3</p> <p><b>circulation [8]</b> 46/17<br/>46/20 61/12 64/24<br/>77/7 118/5 118/6<br/>172/15</p> <p><b>circumstances [2]</b><br/>84/1 87/23</p> <p><b>citation [1]</b> 95/7</p> <p><b>civil [6]</b> 47/13 98/7<br/>144/11 150/19 155/5<br/>157/24</p> <p><b>claim [6]</b> 20/4 80/16<br/>81/21 84/2 85/24<br/>190/12</p> <p><b>claimants [1]</b> 80/24</p> <p><b>claimed [2]</b> 108/18<br/>201/5</p> <p><b>claiming [1]</b> 124/16</p> <p><b>claims [10]</b> 80/11<br/>80/21 80/25 81/14<br/>81/19 81/21 82/3<br/>83/16 83/17 124/19</p> <p><b>Clarification [1]</b><br/>36/24</p> |
|--|--|---|--|--|



| C   |   |  |   |  |
|---|---|--|---|--|
| <p><b>clarify [1]</b> 117/3<br/> <b>clarity [1]</b> 169/8<br/> <b>Clarke [15]</b> 21/12<br/> 22/18 26/14 26/16<br/> 27/13 32/6 32/7 47/7<br/> 47/18 50/25 54/2 56/6<br/> 56/25 57/5 77/15<br/> <b>Clarke's [4]</b> 27/12<br/> 57/25 58/6 87/11<br/> <b>clause [7]</b> 97/13<br/> 97/17 97/20 97/22<br/> 98/1 98/3 98/5<br/> <b>clause 3.2 [1]</b> 97/17<br/> <b>clear [14]</b> 2/15 15/21<br/> 36/13 43/3 45/1 51/9<br/> 56/2 128/5 139/10<br/> 148/22 171/6 196/10<br/> 196/16 199/20<br/> <b>clearly [9]</b> 75/5 75/8<br/> 75/9 131/6 131/9<br/> 132/14 147/12 155/19<br/> 156/15<br/> <b>Cleethorpes [1]</b> 48/5<br/> <b>clerk [1]</b> 48/5<br/> <b>clerks [3]</b> 23/12<br/> 26/25 103/15<br/> <b>Cleveleys [3]</b> 125/9<br/> 126/2 126/3<br/> <b>clients [1]</b> 59/20<br/> <b>cloak [1]</b> 73/24<br/> <b>close [3]</b> 148/12<br/> 165/11 166/2<br/> <b>closed [1]</b> 188/16<br/> <b>closely [2]</b> 92/20<br/> 92/22<br/> <b>closer [1]</b> 57/20<br/> <b>closing [1]</b> 165/2<br/> <b>clue [1]</b> 59/19<br/> <b>clunky [4]</b> 42/18<br/> 42/19 43/1 43/3<br/> <b>Co [1]</b> 134/7<br/> <b>code [4]</b> 6/25 114/10<br/> 114/12 115/25<br/> <b>codes [7]</b> 87/19 88/4<br/> 114/21 115/10 116/4<br/> 116/6 119/8<br/> <b>cognate [1]</b> 4/25<br/> <b>cohort [1]</b> 159/7<br/> <b>collate [2]</b> 23/18<br/> 24/20<br/> <b>collect [1]</b> 96/10<br/> <b>collected [1]</b> 110/10<br/> <b>collection [2]</b> 80/9<br/> 163/20<br/> <b>Collins [1]</b> 141/25<br/> <b>column [4]</b> 104/5<br/> 104/14 192/10 194/12<br/> <b>combined [1]</b> 128/25<br/> <b>come [24]</b> 5/7 26/9<br/> 32/4 35/13 49/15<br/> 66/15 66/22 76/22<br/> 78/3 92/3 96/22 101/3</p> | <p>107/24 114/22 115/3<br/> 118/14 118/22 119/10<br/> 158/9 159/16 174/12<br/> 184/13 197/4 199/22<br/> <b>comes [2]</b> 135/12<br/> 177/10<br/> <b>comfort [1]</b> 179/9<br/> <b>comfortable [1]</b><br/> 171/9<br/> <b>coming [5]</b> 1/15 49/6<br/> 119/16 159/23 202/25<br/> <b>command [4]</b> 111/25<br/> 113/14 176/21 177/6<br/> <b>commence [2]</b><br/> 107/20 155/21<br/> <b>commenced [1]</b><br/> 151/4<br/> <b>commencement [1]</b><br/> 20/11<br/> <b>comment [7]</b> 58/1<br/> 58/22 64/21 83/25<br/> 129/12 146/7 192/15<br/> <b>commentary [1]</b><br/> 188/15<br/> <b>comments [4]</b> 75/22<br/> 144/17 164/16 164/19<br/> <b>commissioned [2]</b><br/> 171/7 175/10<br/> <b>commitments' [1]</b><br/> 138/17<br/> <b>committed [3]</b> 23/11<br/> 26/20 26/24<br/> <b>Committee [10]</b><br/> 140/11 140/13 184/19<br/> 185/1 185/20 185/23<br/> 186/18 188/2 188/4<br/> 190/14<br/> <b>Committee's [1]</b><br/> 184/22<br/> <b>committing [2]</b> 83/19<br/> 86/11<br/> <b>common [7]</b> 47/8<br/> 47/19 49/19 72/17<br/> 190/4 193/12 194/3<br/> <b>comms [1]</b> 187/25<br/> <b>communicate [2]</b><br/> 12/24 72/14<br/> <b>communicating [1]</b><br/> 113/6<br/> <b>communication [13]</b><br/> 49/6 61/14 62/5 66/9<br/> 69/23 75/19 81/10<br/> 84/16 84/20 85/1 85/7<br/> 85/11 152/12<br/> <b>communications [7]</b><br/> 38/15 47/9 66/17<br/> 66/23 67/4 67/20 84/9<br/> <b>community [1]</b> 48/8<br/> <b>comparison [1]</b> 49/2<br/> <b>compensation [1]</b><br/> 189/12<br/> <b>compilation [2]</b><br/> 119/6 175/3<br/> <b>compile [2]</b> 148/18</p> | <p>148/22<br/> <b>compiled [2]</b> 116/15<br/> 173/11<br/> <b>complaints [3]</b> 23/20<br/> 24/22 162/6<br/> <b>complete [4]</b> 14/9<br/> 116/24 151/22 186/3<br/> <b>completed [1]</b><br/> 142/24<br/> <b>completion [1]</b><br/> 160/24<br/> <b>complex [3]</b> 128/13<br/> 164/18 175/20<br/> <b>complexity [1]</b><br/> 131/13<br/> <b>compliance [29]</b> 15/5<br/> 103/17 103/23 104/11<br/> 104/15 104/20 105/12<br/> 105/20 106/1 106/9<br/> 106/12 113/20 114/22<br/> 117/1 118/16 118/17<br/> 119/2 119/7 184/18<br/> 184/22 184/23 185/1<br/> 185/20 185/23 187/1<br/> 187/14 188/2 188/4<br/> 190/14<br/> <b>complies [1]</b> 83/4<br/> <b>comply [1]</b> 27/16<br/> <b>component [1]</b><br/> 168/17<br/> <b>comprehensive [3]</b><br/> 109/3 111/1 130/2<br/> <b>compromised [1]</b><br/> 157/2<br/> <b>computer [8]</b> 23/9<br/> 122/3 123/17 123/20<br/> 124/21 124/22 124/23<br/> 169/19<br/> <b>con [1]</b> 91/5<br/> <b>concealed [1]</b> 71/6<br/> <b>concern [7]</b> 153/3<br/> 153/9 153/16 153/19<br/> 160/1 161/1 161/2<br/> <b>concerned [2]</b> 13/12<br/> 200/23<br/> <b>concerning [7]</b> 8/1<br/> 9/20 20/12 62/17 67/3<br/> 101/6 122/21<br/> <b>concerns [6]</b> 90/14<br/> 91/7 91/22 91/24<br/> 100/18 163/1<br/> <b>concluded [2]</b> 125/20<br/> 127/5<br/> <b>concludes [2]</b> 109/7<br/> 111/5<br/> <b>conclusion [2]</b> 52/10<br/> 127/13<br/> <b>conclusions [8]</b><br/> 27/12 151/17 151/18<br/> 152/5 152/17 153/6<br/> 153/9 158/25<br/> <b>conclusions/report [1]</b> 151/17<br/> <b>concurred [1]</b> 187/2</p> | <p><b>conduct [14]</b> 8/1 22/6<br/> 26/19 28/24 34/2<br/> 87/19 97/8 107/2<br/> 151/15 158/20 160/2<br/> 175/12 178/7 178/25<br/> <b>conducted [8]</b> 26/3<br/> 51/15 62/25 63/24<br/> 95/4 154/14 156/10<br/> 178/16<br/> <b>conducting [2]</b><br/> 158/24 202/5<br/> <b>conduit [1]</b> 35/25<br/> <b>conference [34]</b><br/> 22/19 23/8 23/14 24/4<br/> 24/5 25/11 25/22 26/2<br/> 32/10 51/14 52/11<br/> 52/17 52/25 55/14<br/> 55/16 69/15 72/1 75/9<br/> 78/10 79/5 79/10<br/> 79/20 79/24 89/5<br/> 89/12 90/23 97/9<br/> 98/10 98/19 136/8<br/> 144/16 150/3 158/3<br/> 160/7<br/> <b>conference-call [1]</b><br/> 25/11<br/> <b>conferences [4]</b> 95/3<br/> 97/7 97/25 98/25<br/> <b>confidence [6]</b><br/> 106/18 156/16 162/23<br/> 163/5 163/11 167/20<br/> <b>confidential [7]</b><br/> 80/13 84/11 85/2<br/> 107/22 108/15 110/19<br/> 111/15<br/> <b>confidential' [1]</b><br/> 84/21<br/> <b>confined [1]</b> 111/15<br/> <b>confirm [9]</b> 58/9 85/1<br/> 144/17 144/20 144/24<br/> 145/8 145/23 146/18<br/> 203/2<br/> <b>confiscation [4]</b><br/> 187/10 189/4 189/7<br/> 189/16<br/> <b>confusion [1]</b> 60/23<br/> <b>cons [1]</b> 170/16<br/> <b>consequence [1]</b><br/> 155/21<br/> <b>consequences [1]</b><br/> 158/15<br/> <b>consequently [1]</b><br/> 73/6<br/> <b>consider [16]</b> 2/24<br/> 3/10 22/20 23/9 29/10<br/> 29/15 57/7 58/23<br/> 110/3 112/9 138/16<br/> 153/4 154/4 165/3<br/> 166/4 191/9<br/> <b>consideration [2]</b><br/> 167/22 186/22<br/> <b>considerations [1]</b><br/> 86/2<br/> <b>considered [7]</b> 23/13</p> | <p>23/25 27/18 165/2<br/> 165/12 167/16 184/3<br/> <b>considers [1]</b> 27/1<br/> <b>consist [2]</b> 12/19<br/> 183/18<br/> <b>consistent [5]</b> 45/10<br/> 45/22 139/11 143/1<br/> 196/11<br/> <b>conspiracy [1]</b> 88/11<br/> <b>construct [1]</b> 6/13<br/> <b>consult [1]</b> 3/8<br/> <b>consultants [1]</b><br/> 158/23<br/> <b>consulting [1]</b><br/> 136/12<br/> <b>contact [3]</b> 73/15<br/> 96/22 133/18<br/> <b>contacted [1]</b> 152/25<br/> <b>contain [1]</b> 82/4<br/> <b>containing [1]</b> 83/25<br/> <b>contemporaneous [1]</b> 147/15<br/> <b>content [1]</b> 85/9<br/> <b>contents [7]</b> 3/25<br/> 4/18 27/7 31/12 101/5<br/> 108/1 108/6<br/> <b>context [4]</b> 21/6<br/> 142/3 150/10 197/13<br/> <b>continue [14]</b> 17/3<br/> 64/18 64/21 73/3<br/> 127/8 153/25 155/22<br/> 156/17 157/8 181/25<br/> 182/21 182/22 188/25<br/> 189/21<br/> <b>continued [2]</b> 168/10<br/> 168/23<br/> <b>continues [7]</b> 66/7<br/> 111/11 127/22 131/12<br/> 133/11 151/14 168/7<br/> <b>contract [3]</b> 112/20<br/> 120/24 122/10<br/> <b>contractors [1]</b><br/> 134/23<br/> <b>contrary [5]</b> 43/16<br/> 44/5 44/16 44/19 45/5<br/> <b>contrast [1]</b> 110/18<br/> <b>contributed [1]</b> 169/7<br/> <b>contribution [1]</b><br/> 37/20<br/> <b>contributions [2]</b><br/> 151/8 186/16<br/> <b>control [3]</b> 83/12<br/> 86/9 128/23<br/> <b>controlled [1]</b> 128/3<br/> <b>controls [1]</b> 133/17<br/> <b>convened [2]</b> 26/2<br/> 51/14<br/> <b>convenient [1]</b> 64/5<br/> <b>conversation [7]</b><br/> 45/13 56/9 57/1 67/1<br/> 78/18 139/17 139/25<br/> <b>conversations [5]</b><br/> 16/20 17/1 77/24<br/> 161/12 170/24</p> |

|          |   |   |  |  |   |
|----------|---|---|--|--|---|
| <b>C</b> | 127/9<br><b>conveyed [1]</b> 52/22<br><b>convict [1]</b> 28/23<br><b>convicted [6]</b> 28/19<br>29/9 161/15 166/20<br>189/24 202/12<br><b>conviction [4]</b> 29/13<br>29/15 97/5 110/3<br><b>convictions [3]</b> 30/9<br>154/5 157/12<br><b>convince [2]</b> 165/19<br>168/4<br><b>Cook [1]</b> 16/25<br><b>cooperating [1]</b><br>157/22<br><b>copied [7]</b> 47/2 90/7<br>121/18 131/25 141/25<br>144/14 198/5<br><b>copies [1]</b> 145/21<br><b>copy [10]</b> 3/17 4/10<br>27/5 56/4 81/5 81/8<br>85/6 93/22 149/7<br>167/8<br><b>copying [1]</b> 85/10<br><b>Corbett [1]</b> 185/12<br><b>corner [1]</b> 41/10<br><b>corporate [1]</b> 48/8<br><b>correct [22]</b> 4/12<br>20/1 24/18 25/20<br>43/25 44/4 59/25 60/5<br>60/6 60/14 60/15<br>62/18 62/19 62/22<br>67/6 70/22 70/24<br>92/10 96/17 156/8<br>177/12 179/10<br><b>correct' [1]</b> 127/12<br><b>corrected [1]</b> 182/11<br><b>corrections [2]</b> 3/23<br>128/12<br><b>correctly [3]</b> 49/17<br>83/8 178/23<br><b>correspondence [2]</b><br>36/25 126/22<br><b>could [37]</b> 15/8 15/12<br>16/16 18/11 18/15<br>19/8 19/25 23/24<br>48/23 63/5 63/12<br>70/10 74/9 82/19<br>113/8 124/24 125/1<br>125/21 125/25 131/3<br>133/4 138/18 140/5<br>140/19 140/19 142/5<br>153/25 156/18 156/21<br>157/10 157/19 163/9<br>167/19 170/7 187/3<br>199/15 200/19<br><b>couldn't [4]</b> 30/4<br>63/24 117/20 193/21<br><b>counsel [9]</b> 1/24 2/5<br>3/4 66/16 67/2 71/13<br>87/18 92/16 190/25<br><b>counter [1]</b> 10/14<br><b>counterclaim [1]</b> | 127/9<br><b>country [1]</b> 157/1<br><b>couple [8]</b> 13/1 38/2<br>56/10 94/19 134/23<br>164/17 188/11 197/4<br><b>course [11]</b> 11/2 11/4<br>64/8 85/13 86/24<br>88/11 101/9 119/19<br>126/6 164/4 183/23<br><b>court [26]</b> 29/12<br>29/14 66/12 66/19<br>66/25 67/6 67/21<br>76/10 80/22 125/24<br>139/5 156/2 157/16<br>157/16 165/5 170/19<br>171/1 171/8 171/13<br>171/18 171/25 189/7<br>189/24 190/13 195/23<br>200/18<br><b>courts [3]</b> 59/3<br>123/25 156/13<br><b>cover [2]</b> 10/17 58/7<br><b>coverage [1]</b> 122/7<br><b>covered [3]</b> 33/7<br>57/22 171/21<br><b>covering [1]</b> 84/23<br><b>covers [1]</b> 198/18<br><b>CPS [3]</b> 6/15 6/17<br>6/18<br><b>create [12]</b> 7/24<br>24/20 24/25 70/6<br>70/11 76/6 76/18<br>81/12 82/20 83/24<br>99/24 131/16<br><b>created [12]</b> 14/16<br>62/5 66/17 66/24 67/4<br>68/4 68/22 68/23<br>69/23 82/18 101/6<br>125/21<br><b>creating [2]</b> 72/20<br>76/16<br><b>creation [13]</b> 45/20<br>63/7 67/19 83/11<br>83/13 85/22 86/10<br>103/13 120/16 168/15<br>169/15 169/22 170/6<br><b>credibility [1]</b> 27/24<br><b>Crichton [45]</b> 30/14<br>30/15 31/18 35/10<br>35/15 35/20 39/22<br>40/12 43/12 43/22<br>45/7 46/13 46/17<br>48/19 51/4 52/5 53/14<br>53/15 55/19 56/10<br>60/10 61/17 61/18<br>64/22 64/25 66/16<br>66/22 68/8 69/2 71/13<br>75/5 76/1 78/8 78/14<br>78/17 78/20 80/10<br>89/16 92/9 92/18<br>93/15 181/1 181/25<br>182/14 190/23<br><b>Crichton's [2]</b> 35/25<br>91/23 | <b>crime [6]</b> 96/2 188/23<br>188/24 189/12 190/1<br>190/5<br><b>criminal [39]</b> 6/11 8/1<br>16/4 21/3 22/22 23/10<br>26/19 47/13 59/3<br>70/10 95/11 98/6<br>100/8 103/14 107/1<br>111/13 111/20 112/2<br>112/14 112/20 144/11<br>145/22 150/19 155/2<br>155/22 156/13 156/18<br>157/5 157/24 171/11<br>172/15 172/23 174/5<br>174/8 176/13 178/15<br>178/25 179/9 182/23<br><b>criminology [1]</b> 5/14<br><b>critical [6]</b> 65/10<br>65/18 83/20 83/25<br>86/12 157/17<br><b>criticism [1]</b> 157/15<br><b>cross [3]</b> 137/15<br>139/4 195/22<br><b>Crown [8]</b> 6/25 10/13<br>186/20 187/4 187/7<br>187/19 189/7 189/17<br><b>Crowns [1]</b> 187/23<br><b>Crucially [1]</b> 125/22<br><b>crystal [1]</b> 171/6<br><b>culture [3]</b> 72/24<br>73/1 165/25<br><b>cupboard [1]</b> 68/13<br><b>curious [1]</b> 160/22<br><b>current [7]</b> 24/2 28/2<br>28/3 29/4 121/8<br>156/24 188/18<br><b>currently [3]</b> 27/3<br>188/21 198/16<br><b>custodian [1]</b> 54/13<br><b>customer [1]</b> 200/16<br><b>cut [1]</b> 155/15 | 169/15 169/22 170/6<br>188/16 188/18 193/18<br>194/9 194/20 194/24<br><b>dated [10]</b> 3/18 23/1<br>23/3 26/13 41/8<br>136/25 167/10 192/6<br>192/7 192/8<br><b>dates [2]</b> 83/1 194/12<br><b>Dave [21]</b> 32/23<br>51/24 90/6 118/9<br>130/1 130/24 131/6<br>131/9 135/15 135/18<br>137/14 137/16 139/20<br>143/4 146/7 150/16<br>154/19 154/22 155/15<br>155/16 164/3<br><b>Dave Smith [2]</b><br>130/24 139/20<br><b>Dave's [3]</b> 137/20<br>139/13 196/13<br><b>David [5]</b> 123/5 124/3<br>131/20 149/11 185/13<br><b>day [27]</b> 11/4 13/6<br>13/6 41/13 46/24 50/6<br>78/2 78/24 89/16 93/3<br>93/17 146/25 147/21<br>152/24 175/23 175/23<br>176/14 176/14 176/25<br>176/25 177/12 177/12<br>177/18 177/18 177/22<br>177/22 203/12<br><b>day's [1]</b> 11/2<br><b>days [3]</b> 105/17<br>142/13 164/17<br><b>deal [5]</b> 21/4 27/3<br>90/22 92/2 138/18<br><b>dealing [3]</b> 108/23<br>179/18 195/19<br><b>dealings [1]</b> 37/23<br><b>dealt [3]</b> 38/3 73/16<br>86/24<br><b>Dear [3]</b> 57/17 80/14<br>164/7<br><b>debate [2]</b> 38/7 125/4<br><b>debriefed [1]</b> 39/23<br><b>debt [2]</b> 121/4 122/17<br><b>decade [2]</b> 31/9<br>100/3<br><b>decide [7]</b> 48/23 74/2<br>86/18 86/22 120/1<br>178/15 178/24<br><b>decided [6]</b> 2/11<br>54/12 127/8 127/10<br>182/19 191/18<br><b>deciding [1]</b> 110/1<br><b>decipher [1]</b> 37/2<br><b>decision [22]</b> 74/21<br>86/7 88/6 88/8 88/12<br>88/13 88/17 101/20<br>107/2 112/22 120/2<br>140/5 140/7 157/18<br>168/20 168/22 168/25<br>169/6 169/10 181/2<br>181/15 183/3 | <b>decision-maker [1]</b><br>181/2<br><b>decision-making [3]</b><br>140/7 169/6 169/10<br><b>decisions [7]</b> 6/14<br>6/19 6/21 18/24 19/1<br>32/1 86/3<br><b>decline [1]</b> 2/4<br><b>defect [1]</b> 99/9<br><b>defects [6]</b> 23/19<br>24/21 147/25 148/3<br>148/6 163/8<br><b>defence [11]</b> 81/1<br>83/15 85/23 139/7<br>142/9 156/12 156/14<br>168/12 195/25 202/4<br>202/5<br><b>defend [1]</b> 131/17<br><b>defendant [2]</b> 29/9<br>95/16<br><b>defendants [7]</b> 28/15<br>28/19 28/21 29/7 97/2<br>156/5 157/19<br><b>definitely [2]</b> 38/20<br>102/11<br><b>definition [1]</b> 99/2<br><b>delay [1]</b> 94/3<br><b>delegated [4]</b> 34/8<br>136/15 169/3 177/13<br><b>Delegating [1]</b><br>135/24<br><b>delete [2]</b> 42/23<br>82/21<br><b>deleted [4]</b> 43/5<br>45/16 68/18 71/3<br><b>deliberately [1]</b> 88/2<br><b>deliver [1]</b> 1/20<br><b>delivering [1]</b> 13/15<br><b>delivery [1]</b> 26/20<br><b>Deloitte's [7]</b> 137/23<br>138/14 140/1 149/25<br>152/25 170/14 170/21<br><b>demanding [1]</b><br>175/18<br><b>demands [1]</b> 2/12<br><b>demonstrates [1]</b><br>129/6<br><b>den [1]</b> 80/10<br><b>denials [1]</b> 102/4<br><b>departed [1]</b> 93/5<br><b>department [33]</b><br>13/19 18/21 31/1<br>31/10 33/10 36/11<br>40/19 43/10 43/23<br>44/8 46/8 47/23 54/21<br>58/25 72/18 81/11<br>83/1 83/4 90/11 97/16<br>97/19 97/25 100/7<br>100/16 105/25 134/16<br>134/21 149/20 163/23<br>164/11 165/25 177/19<br>179/16<br><b>departments [4]</b><br>96/23 98/2 98/4 137/7 |
|----------|---|---|--|--|---|

|                              |                              |                               |                              |                            |
|------------------------------|------------------------------|-------------------------------|------------------------------|----------------------------|
| <b>D</b>                     | 21/24 24/4 24/9 24/11        | <b>direct</b> [4] 33/15       | <b>discoverable</b> [1] 68/9 | 92/14 93/12 94/23          |
| <b>departure</b> [2] 93/12   | 24/11 24/17 27/5 27/6        | 134/25 179/18 190/20          | <b>discredited</b> [6] 18/5  | 100/19 103/16 104/20       |
| 124/12                       | 27/8 30/17 30/20             | <b>directed</b> [2] 75/12     | 19/23 30/5 30/7 30/11        | 113/18 114/12 114/24       |
| <b>deposit</b> [1] 200/16    | 30/22 30/24 31/6             | 96/25                         | 30/25                        | 115/11 117/19 121/4        |
| <b>deputise</b> [1] 34/1     | 33/18 35/18 37/23            | <b>direction</b> [6] 13/15    | <b>discrepancies</b> [5]     | 128/2 128/8 130/3          |
| <b>deputy</b> [3] 33/9 33/23 | 42/15 42/19 46/19            | 35/6 46/12 73/25              | 74/10 124/25 125/21          | 132/12 134/2 136/9         |
| 33/25                        | 52/23 54/6 54/13             | 147/16 160/20                 | 128/7 163/10                 | 137/18 138/5 138/7         |
| <b>Derby</b> [2] 198/19      | 56/17 61/13 61/22            | <b>directly</b> [4] 73/7      | <b>discrepancy</b> [2]       | 150/24 153/18 156/15       |
| 199/23                       | 66/4 66/8 66/15 66/16        | 132/5 187/24 190/21           | 127/6 200/15                 | 157/21 158/4 158/6         |
| <b>derived</b> [1] 24/1      | 66/21 66/22 66/23            | <b>director</b> [8] 12/2 12/2 | <b>discuss</b> [3] 60/24     | 158/8 159/21 160/2         |
| <b>describe</b> [1] 34/17    | 68/3 71/15 71/22 72/6        | 12/4 12/10 12/11              | 93/6 111/23                  | 161/16 170/3 170/20        |
| <b>described</b> [5] 9/13    | 72/7 72/9 72/13 73/11        | 12/17 12/20 16/2              | <b>discussed</b> [9] 21/8    | 170/25 171/23 173/25       |
| 32/16 47/18 135/20           | 73/23 76/4 78/13             | <b>directorate</b> [1] 34/22  | 30/19 47/8 91/19             | 177/8 180/20 182/16        |
| 154/11                       | 78/16 79/23 85/16            | <b>disabused</b> [1] 48/16    | 136/3 141/14 144/16          | 191/14 194/15 199/7        |
| <b>description</b> [4] 57/16 | 86/2 92/18 93/2 93/8         | <b>disadvantage</b> [1]       | 145/23 170/16                | 201/1 201/6 202/8          |
| 79/2 107/10 126/12           | 100/15 101/17 102/6          | 70/18                         | <b>discussing</b> [2] 31/3   | 202/12                     |
| <b>design</b> [1] 163/4      | 102/13 102/20 102/25         | <b>disagree</b> [1] 96/16     | 41/17                        | <b>Doctor</b> [1] 27/13    |
| <b>desk</b> [1] 119/10       | 103/6 113/21 113/24          | <b>disagreement</b> [2]       | <b>discussion</b> [15]       | <b>document</b> [48] 23/5  |
| <b>Despite</b> [1] 89/6      | 114/1 114/22 115/2           | 14/9 14/14                    | 63/20 70/12 89/21            | 27/1 29/23 29/25           |
| <b>destroy</b> [2] 42/23     | 117/11 117/12 121/24         | <b>disappeared</b> [1]        | 92/25 93/5 136/9             | 31/12 31/16 35/14          |
| 82/22                        | 121/24 125/11 125/23         | 93/17                         | 137/2 141/18 144/5           | 36/4 36/15 37/3 37/9       |
| <b>destroyed</b> [5] 43/5    | 126/2 127/6 132/3            | <b>discharge</b> [2] 13/18    | 144/22 168/8 168/18          | 37/16 78/3 81/25           |
| 45/16 52/21 52/25            | 132/7 134/11 135/3           | 110/9                         | 168/19 169/9 182/4           | 82/25 83/11 83/24          |
| 71/7                         | 140/4 140/14 141/8           | <b>disciplinary</b> [1]       | <b>discussions</b> [8]       | 84/2 84/5 84/14 84/17      |
| <b>destruction</b> [2] 45/18 | 147/3 147/25 148/12          | 103/14                        | 15/24 18/19 75/11            | 84/22 85/1 91/25 94/8      |
| 82/25                        | 154/8 154/10 159/5           | <b>discipline</b> [9] 33/12   | 158/1 158/19 160/17          | 94/24 101/3 103/2          |
| <b>detail</b> [8] 41/14 42/7 | 159/16 161/6 161/23          | 104/8 106/15 108/6            | 169/5 179/5                  | 103/16 103/22 106/11       |
| 78/6 78/25 105/1             | 162/2 164/10 164/14          | 108/24 110/17 111/17          | <b>display</b> [2] 4/6 4/22  | 106/22 108/23 112/1        |
| 116/2 118/24 128/18          | 165/8 165/23 166/9           | 112/18 114/7                  | <b>disputed</b> [3] 142/8    | 113/11 114/10 114/13       |
| <b>detailed</b> [1] 108/12   | 166/21 168/19 171/15         | <b>disciplines</b> [1] 33/17  | 143/19 148/18                | 114/25 115/5 116/23        |
| <b>details</b> [7] 108/4     | 173/13 173/23 173/25         | <b>disclosable</b> [11] 37/4  | <b>disrupt</b> [1] 14/20     | 119/8 163/15 164/21        |
| 108/8 109/1 110/24           | 174/2 174/4 176/19           | 37/18 38/21 39/1              | <b>disseminate</b> [1]       | 171/19 180/8 180/11        |
| 128/9 142/25 143/21          | 177/7 177/23 177/25          | 49/10 50/2 55/4 70/6          | 97/12                        | 197/17 201/21              |
| <b>detectable</b> [1] 63/22  | 178/18 178/18 179/2          | 72/20 87/1 156/11             | <b>disseminated</b> [4]      | <b>documentation</b> [6]   |
| <b>detected</b> [3] 63/16    | 181/14 182/9 183/1           | <b>disclose</b> [16] 27/20    | 25/17 50/20 51/8             | 7/8 34/5 35/8 45/9         |
| 96/3 198/23                  | 183/6 183/18 183/19          | 28/18 29/6 29/10              | 52/15                        | 56/19 82/16                |
| <b>detective</b> [2] 6/5 6/7 | 184/8 184/15 184/18          | 48/24 70/12 72/22             | <b>dissemination</b> [1]     | <b>documents</b> [38] 7/12 |
| <b>deter</b> [1] 14/20       | 184/25 190/7 190/21          | 80/24 84/3 112/6              | 51/12                        | 8/9 8/10 44/13 63/8        |
| <b>determine</b> [5] 73/21   | 192/9 196/5 197/9            | 112/22 127/3 171/25           | <b>dissipated</b> [1] 189/5  | 72/22 76/6 76/18           |
| 133/4 157/10 186/5           | 202/15 202/18                | 172/23 202/13 202/16          | <b>distant</b> [2] 14/6 14/8 | 76/21 80/24 81/5 81/6      |
| 199/8                        | <b>didn't</b> [27] 8/2 8/11  | <b>disclosed</b> [17] 28/15   | <b>distinct</b> [2] 70/17    | 81/8 81/13 81/16           |
| <b>determined</b> [1]        | 12/6 16/6 16/12 42/2         | 28/16 28/21 29/2              | 84/4                         | 81/18 82/2 82/4 82/20      |
| 125/25                       | 55/21 63/3 67/19             | 37/11 47/20 59/2 62/6         | <b>distributed</b> [5] 106/8 | 82/22 83/13 85/22          |
| <b>determining</b> [1]       | 76/21 89/20 105/22           | 65/23 69/4 69/9 76/19         | 113/12 114/6 114/11          | 86/10 93/16 101/5          |
| 74/25                        | 112/7 113/20 114/3           | 83/16 111/18 171/8            | 114/19                       | 102/8 105/23 106/8         |
| <b>Detica</b> [1] 175/11     | 114/22 132/5 133/9           | 171/18 174/9                  | <b>distributing</b> [1]      | 113/11 114/5 114/11        |
| <b>detrimental</b> [2] 38/8  | 139/8 151/8 160/13           | <b>disclosing</b> [1] 112/12  | 163/15                       | 117/23 117/24 119/5        |
| 157/11                       | 172/19 177/15 179/1          | <b>disclosure</b> [49] 21/2   | <b>distribution</b> [3]      | 119/11 143/6 180/16        |
| <b>developed</b> [1] 87/24   | 184/8 197/5 202/18           | 23/14 23/22 28/22             | 149/14 154/23 155/10         | 181/5                      |
| <b>development</b> [4] 9/3   | <b>different</b> [9] 14/25   | 29/5 29/8 36/24 38/16         | <b>divert</b> [1] 80/1       | <b>does</b> [22] 13/10     |
| 9/16 191/11 191/15           | 28/7 29/24 55/23             | 41/17 46/23 47/7              | <b>DK</b> [2] 150/12 150/15  | 34/17 40/10 40/20          |
| <b>devices</b> [1] 81/7      | 147/12 179/11 180/17         | 47/11 55/6 56/13              | <b>do</b> [89] 2/20 3/11     | 55/20 75/19 77/11          |
| <b>diagrammatic</b> [1]      | 180/18 193/24                | 59/17 61/15 64/4              | 10/14 11/1 12/25 15/3        | 77/20 91/9 103/2           |
| 188/14                       | <b>difficult</b> [3] 37/1    | 65/11 66/10 66/11             | 16/6 16/9 21/11 21/14        | 108/17 123/9 138/12        |
| <b>Dickinson</b> [8] 37/22   | 70/25 90/17                  | 66/12 66/18 66/24             | 21/16 24/19 31/3             | 142/15 147/7 147/14        |
| 37/24 38/3 38/5 49/21        | <b>difficulties</b> [2] 17/6 | 67/5 67/21 69/12 70/9         | 31/19 31/22 33/22            | 158/9 176/19 188/8         |
| 49/25 98/13 98/14            | 156/22                       | 70/19 75/23 76/5              | 36/17 37/5 38/18             | 189/15 194/18 198/11       |
| <b>did</b> [145] 6/10 6/13   | <b>difficulty</b> [3] 155/18 | 76/10 77/9 80/12              | 42/17 48/3 50/10 52/1        | <b>doesn't</b> [12] 37/14  |
| 6/21 7/12 8/6 10/24          | 157/14 171/1                 | 81/22 83/8 85/20              | 55/13 55/15 58/11            | 37/14 37/15 63/17          |
| 11/6 11/23 12/9 12/19        | <b>digitalisation</b> [1]    | 88/10 88/18 95/6              | 60/25 63/7 73/12             | 68/15 68/19 70/18          |
| 13/24 14/24 15/16            | 175/13                       | 95/10 95/10 96/4 96/9         | 76/13 76/14 78/15            | 71/4 77/20 147/20          |
| 15/21 16/10 17/11            | <b>diligence</b> [3] 144/19  | 97/3 100/1 103/13             | 78/20 80/7 81/2 83/6         | 170/10 172/18              |
| 20/5 20/7 20/7 21/22         | 144/23 145/4                 | 110/9 112/10 174/5            | 85/24 87/3 87/16 88/2        | <b>doing</b> [14] 29/16    |
|                              | <b>Diploma</b> [1] 5/15      | <b>discover</b> [1] 129/2     | 88/14 91/15 91/23            | 84/24 85/8 105/19          |

|  |  |   |  |   |
|--|--|---|--|---|
| <p><b>D</b></p> <p><b>doing...</b> [10] 105/19<br/>116/19 170/10 171/9<br/>172/13 177/21 178/22<br/>184/6 184/11 196/25</p> <p><b>domain</b> [1] 55/4</p> <p><b>dominant</b> [4] 84/6<br/>84/11 84/15 84/18</p> <p><b>Dominic</b> [1] 121/3</p> <p><b>don't</b> [124] 7/4 7/17<br/>19/14 19/18 22/1 24/6<br/>24/7 24/11 24/17 25/6<br/>27/6 27/8 29/21 29/23<br/>30/1 30/10 31/7 32/20<br/>33/2 37/7 37/15 37/25<br/>39/4 41/4 41/21 41/24<br/>42/3 42/20 45/13<br/>45/14 52/8 53/18 54/8<br/>54/11 54/24 56/6 57/1<br/>58/23 61/2 64/1 65/12<br/>65/16 66/1 66/1 66/5<br/>67/4 68/11 68/12<br/>68/21 70/11 70/12<br/>76/2 76/2 86/6 89/14<br/>90/6 93/11 93/22<br/>94/19 103/19 105/21<br/>106/2 110/6 115/6<br/>116/1 119/23 122/5<br/>122/9 126/4 126/4<br/>126/13 127/21 130/19<br/>134/13 135/9 135/10<br/>137/11 137/11 138/7<br/>138/18 145/2 146/15<br/>147/1 147/11 151/2<br/>151/6 151/13 153/7<br/>154/13 154/13 160/13<br/>161/12 162/1 162/8<br/>165/18 165/22 166/23<br/>169/2 170/23 171/19<br/>173/3 173/8 173/15<br/>174/2 174/7 174/10<br/>181/24 184/11 184/16<br/>185/2 193/17 196/6<br/>196/23 197/1 197/3<br/>197/5 197/11 197/16<br/>200/24 201/21 202/2<br/>202/7 202/15 202/17</p> <p><b>done</b> [13] 7/19 15/16<br/>19/2 19/7 30/20 71/12<br/>79/7 79/19 101/22<br/>161/10 187/11 187/22<br/>202/17</p> <p><b>dotted</b> [3] 12/18<br/>12/19 13/3</p> <p><b>doubt</b> [5] 3/5 89/10<br/>111/23 160/4 194/25</p> <p><b>doubts</b> [1] 171/10</p> <p><b>down</b> [46] 24/11<br/>26/12 32/4 35/16<br/>37/15 38/20 49/10<br/>50/1 51/13 78/3 81/25<br/>92/1 92/3 98/12 101/3<br/>104/8 107/25 108/5</p> | <p>108/10 116/4 117/3<br/>117/25 120/22 127/1<br/>129/23 136/5 136/5<br/>139/3 139/13 140/19<br/>149/8 155/14 160/9<br/>165/3 165/11 166/3<br/>169/3 173/9 174/12<br/>175/2 184/14 186/17<br/>192/4 195/14 197/17<br/>197/20</p> <p><b>draft</b> [7] 57/7 57/11<br/>163/16 169/4 173/17<br/>194/7 194/8</p> <p><b>drafted</b> [1] 129/13</p> <p><b>dramatically</b> [1]<br/>105/7</p> <p><b>draw</b> [3] 15/7 49/2<br/>102/1</p> <p><b>drawing</b> [1] 101/8</p> <p><b>drawn</b> [2] 151/18<br/>153/6</p> <p><b>drive</b> [3] 175/2 175/3<br/>187/14</p> <p><b>driven</b> [2] 70/1 71/11</p> <p><b>driver</b> [1] 18/3</p> <p><b>drives</b> [1] 81/7</p> <p><b>due</b> [6] 85/13 126/6<br/>144/18 144/23 145/4<br/>200/15</p> <p><b>during</b> [10] 3/7 7/19<br/>9/16 9/21 17/20 90/25<br/>113/14 119/21 128/7<br/>198/23</p> <p><b>duties</b> [9] 23/22 95/6<br/>96/9 98/20 98/23<br/>98/25 99/24 100/1<br/>154/5</p> <p><b>duty</b> [10] 10/10 27/16<br/>27/23 28/17 80/23<br/>87/15 87/21 88/1<br/>95/14 95/24</p> <hr/> <p><b>E</b></p> <p><b>each</b> [22] 11/4 26/3<br/>26/5 26/6 26/7 33/11<br/>34/21 34/22 39/21<br/>51/15 51/16 51/17<br/>62/12 69/25 71/10<br/>97/9 98/10 98/18<br/>104/24 106/19 144/10<br/>157/5</p> <p><b>earlier</b> [15] 21/1 50/9<br/>76/20 80/2 89/5 89/7<br/>90/6 90/13 105/17<br/>144/5 145/20 152/24<br/>159/20 160/6 195/11</p> <p><b>early</b> [4] 19/18 42/1<br/>132/14 187/6</p> <p><b>easily</b> [5] 68/9 69/19<br/>70/21 70/22 166/13</p> <p><b>East</b> [2] 120/25<br/>122/11</p> <p><b>effect</b> [6] 28/12 61/8<br/>62/15 78/16 111/6</p> | <p>160/9</p> <p><b>effective</b> [1] 176/6</p> <p><b>effectively</b> [1] 176/9</p> <p><b>effects</b> [1] 27/17</p> <p><b>effort</b> [3] 125/15<br/>128/25 148/21</p> <p><b>either</b> [7] 22/13 22/16<br/>52/14 56/6 158/23<br/>185/24 186/1</p> <p><b>electronic</b> [25] 52/24<br/>61/14 62/4 66/9 66/17<br/>66/23 67/4 67/19 68/6<br/>68/15 68/21 68/25<br/>69/21 70/2 70/5 70/11<br/>70/17 70/20 71/1 72/4<br/>72/11 72/15 75/13<br/>76/16 163/3</p> <p><b>electronically</b> [4]<br/>75/18 75/20 76/9 87/5</p> <p><b>element</b> [7] 48/1<br/>49/14 107/19 117/18<br/>134/16 169/20 189/18</p> <p><b>elements</b> [2] 107/12<br/>111/20</p> <p><b>else</b> [8] 44/11 53/19<br/>85/3 140/9 140/10<br/>164/2 164/4 193/11</p> <p><b>else's</b> [1] 102/15</p> <p><b>email</b> [88] 35/9 36/13<br/>36/24 39/22 45/1<br/>46/16 46/23 46/25<br/>48/19 49/1 51/5 51/10<br/>52/4 55/9 55/18 56/1<br/>57/4 57/15 60/3 60/9<br/>62/9 64/6 65/8 66/7<br/>67/7 67/10 71/14<br/>71/17 72/7 73/14 74/4<br/>76/2 77/1 78/11 78/13<br/>80/13 84/23 85/5 86/6<br/>89/15 89/18 90/4<br/>90/10 93/21 93/25<br/>94/12 120/19 120/23<br/>123/4 126/7 126/16<br/>129/24 131/25 136/20<br/>137/1 138/4 139/16<br/>140/22 141/9 141/24<br/>142/7 143/2 144/14<br/>145/18 146/15 148/16<br/>154/19 155/9 158/19<br/>159/14 160/12 161/1<br/>161/20 161/21 165/6<br/>167/2 172/20 195/11<br/>195/15 195/18 196/13<br/>196/15 196/24 197/21<br/>198/4 198/4 198/8<br/>200/12</p> <p><b>emailed</b> [1] 52/18</p> <p><b>emails</b> [13] 38/14<br/>47/9 52/20 52/24 81/6<br/>83/21 113/13 118/4<br/>137/14 137/16 139/13<br/>146/17 162/21</p> <p><b>embroiled</b> [1] 124/15</p> <p><b>emerged</b> [1] 109/14</p> | <p><b>Emily</b> [1] 80/6</p> <p><b>Emphasised</b> [1] 37/3</p> <p><b>employed</b> [2] 4/25<br/>92/16</p> <p><b>employees</b> [1] 10/12</p> <p><b>employer</b> [1] 28/11</p> <p><b>employment</b> [1]<br/>112/19</p> <p><b>enable</b> [2] 85/8 107/1</p> <p><b>enables</b> [1] 125/19</p> <p><b>encapsulated</b> [1]<br/>124/20</p> <p><b>enclosing</b> [1] 94/14</p> <p><b>encountered</b> [3] 17/6<br/>25/15 50/19</p> <p><b>encouraged</b> [1]<br/>48/13</p> <p><b>end</b> [14] 20/20 21/7<br/>21/8 23/5 117/14<br/>117/22 122/24 124/6<br/>136/16 154/19 182/10<br/>195/21 197/20 200/22</p> <p><b>endorsing</b> [1] 182/18</p> <p><b>engaged</b> [2] 135/21<br/>138/14</p> <p><b>engagement</b> [3] 38/1<br/>104/9 105/2</p> <p><b>England</b> [3] 120/25<br/>122/11 124/2</p> <p><b>enjoy</b> [3] 13/24 17/11<br/>21/24</p> <p><b>enjoys</b> [1] 112/1</p> <p><b>enquire</b> [3] 3/3 29/16<br/>147/19</p> <p><b>enquiries</b> [2] 19/10<br/>183/24</p> <p><b>enquiry</b> [1] 111/20</p> <p><b>ensure</b> [17] 37/3<br/>37/17 68/5 81/10 83/3<br/>96/8 97/24 98/9 98/16<br/>113/20 128/14 129/8<br/>129/15 139/11 155/1<br/>165/4 196/11</p> <p><b>ensured</b> [4] 48/20<br/>67/22 67/25 129/5</p> <p><b>entered</b> [1] 132/2</p> <p><b>enterprise</b> [3] 53/23<br/>67/3 67/18</p> <p><b>entire</b> [1] 159/6</p> <p><b>entirely</b> [1] 20/16</p> <p><b>entirety</b> [2] 22/9<br/>27/11</p> <p><b>entitled</b> [2] 28/22<br/>97/2</p> <p><b>entry</b> [1] 200/15</p> <p><b>episode</b> [1] 80/3</p> <p><b>EPOS</b> [1] 163/2</p> <p><b>Equally</b> [1] 57/23</p> <p><b>equip</b> [1] 128/19</p> <p><b>equipment</b> [1] 99/2</p> <p><b>equips</b> [1] 128/15</p> <p><b>era</b> [1] 20/20</p> <p><b>Ernst</b> [6] 138/22<br/>151/21 152/8 152/22</p> | <p>170/14 170/20</p> <p><b>Err</b> [1] 192/17</p> <p><b>error</b> [1] 99/15</p> <p><b>errors</b> [4] 147/25<br/>148/5 163/7 198/23</p> <p><b>escalated</b> [5] 56/16<br/>63/2 70/15 91/17<br/>177/10</p> <p><b>escalation</b> [6] 61/9<br/>62/16 63/14 69/21<br/>72/3 190/8</p> <p><b>essential</b> [1] 125/18</p> <p><b>essentially</b> [12]<br/>33/23 39/17 61/16<br/>77/2 122/17 135/23<br/>136/4 172/24 175/6<br/>190/16 190/17 192/23</p> <p><b>establish</b> [2] 165/16<br/>166/19</p> <p><b>established</b> [6] 25/12<br/>25/23 32/11 157/14<br/>176/5 189/20</p> <p><b>establishing</b> [1]<br/>90/14</p> <p><b>estate</b> [2] 187/4<br/>187/7</p> <p><b>et</b> [9] 13/16 15/17<br/>84/23 99/22 164/20<br/>168/24 178/3 187/25<br/>196/13</p> <p><b>et cetera</b> [9] 13/16<br/>15/17 84/23 99/22<br/>164/20 168/24 178/3<br/>187/25 196/13</p> <p><b>etc</b> [3] 38/15 47/9<br/>75/21</p> <p><b>ethnic</b> [1] 116/13</p> <p><b>ethos</b> [1] 175/5</p> <p><b>evasive</b> [1] 90/12</p> <p><b>even</b> [11] 10/18<br/>10/22 71/3 71/7 76/2<br/>80/25 123/12 126/13<br/>170/23 179/7 197/13</p> <p><b>event</b> [9] 16/8 16/9<br/>17/14 22/18 49/24<br/>77/11 122/10 137/13<br/>138/13</p> <p><b>events</b> [2] 20/16<br/>106/24</p> <p><b>ever</b> [13] 6/21 72/9<br/>89/10 102/25 116/19<br/>154/8 154/12 160/21<br/>161/13 166/9 166/22<br/>166/24 178/18</p> <p><b>every</b> [7] 15/18 84/20<br/>97/9 98/10 98/19<br/>102/18 157/1</p> <p><b>everyone</b> [7] 15/22<br/>81/11 147/3 165/13<br/>166/5 166/15 178/22</p> <p><b>everything</b> [9] 39/1<br/>63/1 81/2 83/6 85/24<br/>118/21 130/8 170/12<br/>173/5</p> |
|--|--|---|--|---|

|          |  |  |  |  |   |
|----------|--|--|--|--|---|
| <b>E</b> | <b>expand [1]</b> 185/10<br><b>expanded [1]</b> 187/2<br><b>expect [7]</b> 53/20<br>105/14 109/18 128/17<br>140/11 161/18 186/13<br><b>expected [5]</b> 9/16<br>100/16 101/22 125/16<br>172/16<br><b>expensive [1]</b> 133/24<br><b>experience [5]</b> 4/23<br>123/20 128/14 128/19<br>176/10<br><b>experienced [1]</b><br>178/11<br><b>expert [43]</b> 18/10<br>18/11 18/15 19/3 19/8<br>19/16 19/22 19/24<br>23/21 25/19 26/18<br>27/21 27/23 27/25<br>28/1 28/4 28/7 29/18<br>50/22 122/22 123/20<br>125/9 125/18 125/20<br>127/4 127/24 128/14<br>128/17 128/24 129/9<br>129/16 129/17 130/11<br>130/13 131/4 133/23<br>136/10 140/16 146/3<br>172/2 172/13 172/22<br>173/4<br><b>expert' [1]</b> 123/11<br><b>expertise [2]</b> 18/4<br>157/23<br><b>experts [6]</b> 125/14<br>129/10 133/23 136/13<br>170/25 171/17<br><b>explain [9]</b> 3/12<br>10/11 129/6 133/14<br>133/17 146/22 148/25<br>152/13 191/10<br><b>explained [2]</b> 31/12<br>178/9<br><b>explaining [1]</b> 123/11<br><b>explanation [4]</b> 46/19<br>49/18 129/3 188/20<br><b>explanations [1]</b><br>188/14<br><b>explicit [3]</b> 47/25<br>112/5 121/16<br><b>explored [1]</b> 153/5<br><b>expressed [2]</b> 161/1<br>162/23<br><b>expression [1]</b> 170/3<br><b>extant [1]</b> 194/11<br><b>extended [1]</b> 10/22<br><b>extends [2]</b> 81/5<br>95/24<br><b>extent [3]</b> 52/14<br>176/16 183/6<br><b>external [18]</b> 19/12<br>19/13 21/20 49/12<br>70/14 92/17 131/14<br>140/16 151/18 152/3<br>152/19 153/10 158/23<br>159/1 159/1 160/10 | 170/25 179/8<br><b>extraction [1]</b> 135/8<br><b>extracts [1]</b> 101/8<br><b>eye [1]</b> 197/8<br><b>eyes [1]</b> 148/12 | <b>F</b><br><b>face [1]</b> 124/20<br><b>faced [1]</b> 155/4<br><b>faces [1]</b> 128/24<br><b>facsimile [1]</b> 55/8<br><b>fact [17]</b> 4/16 8/11<br>30/8 37/9 43/14 44/2<br>44/11 68/18 79/23<br>95/9 108/17 173/2<br>177/6 177/15 197/13<br>199/15 202/9<br><b>faction [2]</b> 58/11<br>58/13<br><b>factions [1]</b> 58/3<br><b>facts [1]</b> 139/14<br><b>factual [1]</b> 177/6<br><b>failed [4]</b> 27/15 27/20<br>156/2 177/7<br><b>failure [11]</b> 27/17<br>27/22 28/9 28/11<br>28/14 28/18 29/10<br>29/17 88/6 99/15<br>202/13<br><b>failures [9]</b> 109/1<br>109/4 109/7 110/24<br>111/2 111/5 111/12<br>111/17 133/16<br><b>fair [3]</b> 46/5 96/5<br>196/21<br><b>fairness [1]</b> 2/12<br><b>faithfully [1]</b> 61/22<br><b>fall [2]</b> 62/6 117/12<br><b>fallen [1]</b> 152/25<br><b>falling [2]</b> 115/2<br>117/2<br><b>false [1]</b> 99/12<br><b>familiar [2]</b> 6/24<br>125/7<br><b>far [16]</b> 9/8 18/20<br>60/4 73/9 73/11 73/13<br>74/15 74/19 75/1 81/2<br>83/6 106/6 125/15<br>143/21 154/9 200/22<br><b>farming [1]</b> 135/22<br><b>fashion [1]</b> 177/12<br><b>fatally [1]</b> 27/25<br><b>fault [2]</b> 99/10 124/17<br><b>featured [1]</b> 123/19<br><b>February [12]</b> 5/1<br>120/18 121/14 126/10<br>134/12 136/25 140/25<br>141/24 142/16 147/24<br>149/23 158/2<br><b>February 2010 [5]</b><br>120/18 121/14 134/12<br>140/25 147/24<br><b>fed [3]</b> 35/16 39/2<br>91/1 | <b>feedback [3]</b> 60/19<br>60/25 130/23<br><b>feeding [1]</b> 100/17<br><b>few [2]</b> 94/10 142/13<br><b>field [2]</b> 123/21<br>133/16<br><b>fielded [1]</b> 125/12<br><b>fifth [1]</b> 107/17<br><b>figure [5]</b> 188/16<br>188/18 189/13 190/1<br>190/5<br><b>figures [2]</b> 156/7<br>189/25<br><b>file [6]</b> 102/8 104/6<br>104/16 104/18 119/6<br>150/22<br><b>filed [1]</b> 34/7<br><b>files [14]</b> 6/13 6/15<br>6/17 6/18 18/23 31/24<br>102/7 106/14 150/25<br>179/6 179/25 180/21<br>180/24 182/15<br><b>fill [1]</b> 115/5<br><b>final [1]</b> 195/15<br><b>finalised [2]</b> 129/13<br>164/22<br><b>Finally [2]</b> 129/8<br>129/10<br><b>financial [5]</b> 143/17<br>145/24 146/5 148/8<br>199/9<br><b>find [8]</b> 18/9 18/11<br>19/3 19/8 138/8<br>146/11 148/11 155/9<br><b>finding [1]</b> 196/3<br><b>fine [1]</b> 173/5<br><b>fired [1]</b> 127/7<br><b>firm [3]</b> 21/17 22/5<br>87/20<br><b>firms [5]</b> 131/15<br>133/22 136/11 136/12<br>137/22<br><b>first [39]</b> 3/25 4/5 5/6<br>13/1 14/2 23/2 25/20<br>26/14 26/15 26/16<br>32/7 32/14 40/7 41/19<br>43/20 49/3 49/22<br>50/14 57/7 57/11<br>61/16 63/8 64/19<br>66/20 77/15 90/9<br>126/2 129/1 140/2<br>141/5 145/17 152/2<br>163/14 174/14 175/7<br>180/13 181/14 185/10<br>187/3<br><b>firstly [4]</b> 19/22 61/19<br>62/13 128/23<br><b>Fis [1]</b> 143/15<br><b>fitted [1]</b> 138/19<br><b>FIU [1]</b> 190/9<br><b>five [4]</b> 9/5 33/11<br>33/15 117/4<br><b>five-year [1]</b> 9/5<br><b>fix [1]</b> 125/4 | <b>flag [1]</b> 124/16<br><b>flaw' [1]</b> 127/11<br><b>flaws [1]</b> 130/22<br><b>Flemington [1]</b> 80/10<br><b>flouted [1]</b> 88/2<br><b>flush [1]</b> 170/12<br><b>focus [1]</b> 186/23<br><b>focused [1]</b> 14/17<br><b>focusing [1]</b> 5/13<br><b>FOI [3]</b> 61/15 69/12<br>75/23<br><b>follow [4]</b> 129/10<br>142/15 176/19 194/18<br><b>followed [1]</b> 80/22<br><b>following [20]</b> 16/3<br>27/10 27/19 36/3<br>52/10 52/15 71/21<br>75/10 79/12 84/12<br>98/4 98/11 107/13<br>128/4 150/3 188/3<br>188/5 191/10 198/8<br>203/12<br><b>follows [1]</b> 180/12<br><b>font [2]</b> 118/18<br>118/21<br><b>foot [16]</b> 50/13 57/10<br>60/7 90/8 107/14<br>123/3 124/8 131/20<br>136/20 141/23 144/2<br>154/20 154/22 163/14<br>182/7 191/8<br><b>footer [3]</b> 107/21<br>108/3 110/18<br><b>footers [2]</b> 108/7<br>108/13<br><b>footprint [3]</b> 68/15<br>68/19 71/3<br><b>forbidden [2]</b> 46/11<br>46/15<br><b>fore [1]</b> 143/25<br><b>forensic [1]</b> 143/7<br><b>foreword [1]</b> 95/9<br><b>Forgive [1]</b> 124/10<br><b>form [3]</b> 2/10 86/2<br>99/6<br><b>forma [1]</b> 114/7<br><b>formal [6]</b> 75/12<br>76/15 77/12 177/23<br>178/1 178/2<br><b>format [2]</b> 39/8 104/4<br><b>former [3]</b> 5/19 65/24<br>80/16<br><b>forward [18]</b> 26/10<br>40/14 42/25 85/3 90/3<br>91/6 103/3 128/4<br>134/2 135/18 136/19<br>139/25 142/24 155/7<br>167/7 178/4 196/17<br>202/16<br><b>forwarded [4]</b> 54/4<br>54/22 102/9 145/12<br><b>forwards [7]</b> 39/5<br>41/6 126/15 139/19<br>141/21 163/13 167/13 |
|----------|--|--|--|--|---|

|   |   |  |  |   |
|---|---|--|--|---|
| <b>F</b>  | 118/6 125/7 135/12<br>135/17 135/25 137/14<br>143/11 144/5 144/13<br>144/13 154/18 155/3<br>164/19 168/14 170/19<br>186/20 199/7 200/9  | <b>give/receive [1]</b> 84/6<br><b>given [42]</b> 6/13 19/24<br>30/25 35/5 35/15 39/2<br>40/7 43/12 43/16<br>44/17 44/20 45/6<br>45/23 49/20 52/19<br>53/5 54/20 54/25<br>55/25 61/7 62/14<br>69/20 71/21 72/2 82/9<br>82/10 85/14 85/17<br>104/24 108/13 112/14<br>112/17 124/11 131/13<br>138/17 142/11 153/13<br>158/1 186/23 188/12<br>189/6 192/5   | 64/14 65/21 65/22<br>66/3 95/1 118/20<br>120/10 162/18 172/6<br>203/1<br><b>got [27]</b> 7/7 16/23<br>24/9 24/13 76/5 78/20<br>81/20 87/3 93/10<br>93/15 104/3 104/18<br>107/4 118/4 122/21<br>124/1 126/6 129/16<br>129/17 158/14 159/18<br>162/25 173/4 173/25<br>177/6 186/3 194/20   | 44/11 44/12 44/17<br>44/20 45/2 45/2 45/3<br>45/6 45/23 47/22<br>49/22 50/18 52/18<br>54/10 54/25 56/25<br>59/16 60/18 60/19<br>65/1 65/7 68/7 69/1<br>69/18 73/5 78/18 79/7<br>79/19 86/3 86/7 86/25<br>89/20 92/13 94/4<br>100/18 100/18 102/20<br>102/21 114/25 115/1<br>122/3 125/18 125/23<br>127/16 133/3 134/17<br>136/12 142/17 148/21<br>149/24 149/24 154/5<br>158/18 159/17 160/5<br>161/24 162/24 162/25<br>165/16 169/23 176/22<br>177/20 179/18 180/22<br>181/11 183/3 189/10<br>190/6 190/10 191/14<br>201/4   |
| <b>fostered [1]</b> 48/14<br><b>found [8]</b> 18/15 19/25<br>69/3 70/21 139/4<br>190/9 195/17 195/22<br><b>founding [1]</b> 69/8<br><b>four [4]</b> 56/24 81/20<br>122/14 134/22<br><b>four paragraphs [1]</b><br>122/14<br><b>frame [1]</b> 167/21<br><b>framework [5]</b> 87/8<br>90/20 138/15 138/18<br>176/6<br><b>Francis [2]</b> 16/17<br>190/22<br><b>fraud [22]</b> 14/17 15/5<br>16/23 33/8 33/13<br>77/24 105/16 117/5<br>117/10 117/17 132/9<br>149/17 150/20 175/13<br>176/5 176/16 177/25<br>178/6 179/3 188/15<br>191/25 198/15<br><b>Freedom [4]</b> 46/22<br>61/15 66/10 77/9<br><b>frequent [1]</b> 133/25<br><b>frequently [5]</b> 105/24<br>175/19 184/25 185/22<br>186/5<br><b>front [3]</b> 3/17 4/10<br>96/25<br><b>frustrated [5]</b> 61/11<br>62/1 64/23 64/25 65/6<br><b>FUJ00155516 [1]</b><br>197/20<br><b>FUJ00156120 [1]</b><br>120/18<br><b>Fujitsu [21]</b> 18/5<br>19/23 23/20 28/10<br>74/7 74/21 125/11<br>128/25 130/4 130/10<br>131/23 132/4 132/5<br>133/4 133/12 133/18<br>141/19 141/19 157/22<br>162/25 197/23<br><b>fulfil [1]</b> 28/7<br><b>full [5]</b> 1/12 130/4<br>151/16 160/2 189/11<br><b>fully [8]</b> 25/2 25/4<br>48/22 81/14 96/8<br>124/13 127/25 157/22<br><b>function [14]</b> 21/8<br>23/16 33/5 34/18 53/9<br>87/25 133/3 134/11<br>135/3 181/23 183/2<br>184/22 185/19 186/25<br><b>functioned [1]</b> 10/9<br><b>functions [5]</b> 20/25<br>31/11 97/21 98/3<br>98/20<br><b>further [22]</b> 29/4<br>57/14 82/23 99/17 | <b>G</b><br><b>gain [1]</b> 151/18<br><b>gained [1]</b> 125/18<br><b>Gareth [2]</b> 133/12<br>133/19<br><b>gather [1]</b> 84/7<br><b>gathered [1]</b> 199/1<br><b>gathering [5]</b> 80/12<br>84/19 97/1 125/17<br>175/1<br><b>gave [6]</b> 22/24 40/11<br>44/6 88/17 179/9<br>193/6<br><b>Gayle [1]</b> 93/25<br><b>Gelsthorpe [2]</b> 57/15<br>58/12<br><b>general [8]</b> 66/16<br>67/2 71/13 92/16<br>94/11 107/9 144/23<br>190/25<br><b>General's [1]</b> 95/9<br><b>generally [3]</b> 20/25<br>50/4 183/21<br><b>generate [1]</b> 159/21<br><b>generated [1]</b> 75/20<br><b>generation [1]</b> 76/8<br><b>genesis [1]</b> 120/16<br><b>genuinely [1]</b> 147/18<br><b>get [24]</b> 7/10 8/8 8/14<br>65/20 93/10 104/17<br>105/22 110/22 110/23<br>119/12 126/21 129/12<br>130/8 135/20 137/18<br>138/4 140/15 158/6<br>158/7 171/24 172/8<br>172/22 173/3 183/19<br><b>gets [2]</b> 104/16<br>177/10<br><b>getting [10]</b> 15/1 25/6<br>56/11 105/15 131/2<br>158/23 170/4 171/16<br>172/1 172/12<br><b>gist [1]</b> 56/8<br><b>give [27]</b> 2/13 19/16<br>21/5 28/6 42/15 46/19<br>52/23 53/7 53/9 53/24<br>54/6 71/22 72/6 84/6<br>92/5 114/1 149/6<br>151/19 152/11 152/19<br>158/16 167/19 169/8<br>179/13 182/17 191/3<br>202/25 | <b>gives [5]</b> 128/1<br>169/13 188/13 194/22<br>198/17<br><b>giving [5]</b> 18/6 18/7<br>37/5 85/20 152/9<br><b>glitch [1]</b> 73/4<br><b>go [56]</b> 4/13 5/6 5/8<br>10/13 11/23 12/9 26/1<br>26/11 26/15 27/10<br>27/11 38/11 43/4<br>45/15 46/16 55/18<br>62/21 65/8 66/13 67/7<br>73/14 77/1 87/11 89/3<br>98/22 98/22 103/3<br>106/20 108/10 108/21<br>123/2 124/7 124/21<br>126/15 129/22 130/3<br>135/12 140/6 140/8<br>140/15 142/20 154/20<br>155/16 163/19 167/13<br>172/22 173/3 173/9<br>176/2 178/4 180/22<br>191/22 195/14 197/20<br>198/3 200/9<br><b>goal [1]</b> 175/14<br><b>goes [2]</b> 87/6 196/8<br><b>going [55]</b> 12/25 16/2<br>16/9 19/10 21/4 25/21<br>27/10 27/12 31/5<br>35/13 38/11 42/25<br>43/10 43/22 43/24<br>44/8 48/22 49/15 51/5<br>58/1 71/14 71/17 72/7<br>74/4 76/18 78/7 79/1<br>89/11 91/5 92/5 94/25<br>98/21 106/4 108/21<br>113/22 118/16 120/19<br>121/17 126/24 130/5<br>146/19 147/8 151/3<br>152/2 152/5 152/17<br>152/18 152/25 155/6<br>159/6 167/25 168/2<br>172/1 191/22 197/19<br><b>gone [8]</b> 107/17<br>130/7 159/8 161/9<br>166/17 183/9 194/7<br>194/24<br><b>good [16]</b> 1/3 1/10<br>13/24 14/2 14/4 17/11 | <b>governance [4]</b><br>75/14 75/16 76/17<br>90/18<br><b>government [1]</b><br>124/22<br><b>Graham [2]</b> 141/25<br>143/11<br><b>grasped [1]</b> 57/22<br><b>grateful [3]</b> 1/18<br>81/17 200/19<br><b>gravitas [2]</b> 152/20<br>159/1<br><b>gravitas' [1]</b> 151/20<br><b>great [1]</b> 14/1<br><b>greater [1]</b> 190/5<br><b>greatest [1]</b> 125/3<br><b>ground [1]</b> 29/11<br><b>grounds [2]</b> 2/21<br>59/23<br><b>group [29]</b> 11/20<br>11/23 12/2 12/6 12/11<br>12/16 12/17 12/20<br>12/22 16/1 17/2 17/8<br>20/3 20/11 35/2 40/5<br>90/14 90/22 94/13<br>138/14 147/16 147/17<br>181/21 192/12 192/13<br>193/20 194/1 195/7<br>195/9<br><b>guarantee [2]</b> 157/7<br>199/12<br><b>guess [7]</b> 13/21<br>53/11 53/25 66/3<br>165/14 169/20 182/24<br><b>guidance [1]</b> 108/12<br><b>guide [3]</b> 106/13<br>107/6 107/13<br><b>Guidelines [1]</b> 95/10<br><b>guy [2]</b> 128/16 173/4<br><b>guys [1]</b> 142/4 | 100/18 100/18 102/20<br>102/21 114/25 115/1<br>122/3 125/18 125/23<br>127/16 133/3 134/17<br>136/12 142/17 148/21<br>149/24 149/24 154/5<br>158/18 159/17 160/5<br>161/24 162/24 162/25<br>165/16 169/23 176/22<br>177/20 179/18 180/22<br>181/11 183/3 189/10<br>190/6 190/10 191/14<br>201/4<br><b>hadn't [3]</b> 77/12<br>165/21 169/24<br><b>half [2]</b> 5/4 167/14<br><b>Halfway [1]</b> 173/9<br><b>hand [11]</b> 41/10<br>104/5 104/14 129/7<br>161/7 161/7 166/10<br>188/6 188/22 192/10<br>194/11<br><b>hand' [1]</b> 161/13<br><b>handheld [1]</b> 81/7<br><b>handle [1]</b> 122/19<br><b>hands [1]</b> 152/13<br><b>handwritten [11]</b><br>26/8 51/19 52/2 52/7<br>54/3 54/20 67/23<br>67/24 67/25 68/3<br>68/24<br><b>happen [10]</b> 16/10<br>16/12 21/11 35/21<br>113/25 125/1 125/23<br>154/8 154/12 184/1<br><b>happened [15]</b> 44/12<br>52/1 60/14 108/5<br>113/24 125/5 125/25<br>127/16 127/19 136/9<br>141/12 141/16 159/2<br>159/9 160/21<br><b>happening [4]</b> 39/20<br>154/16 159/11 187/23<br><b>hard [6]</b> 3/17 4/10<br>53/20 81/7 81/8 149/7<br><b>has [49]</b> 2/3 28/4<br>28/11 29/5 41/18<br>52/16 68/18 70/1<br>70/17 71/11 80/15<br>81/11 87/24 113/13<br>123/7 123/8 129/9<br>129/16 129/17 131/17<br>145/12 152/25 154/10<br>154/24 155/15 156/4 |
|   |   |  | <b>H</b><br><b>had [101]</b> 9/6 9/10<br>9/10 9/25 10/2 11/9<br>13/13 13/17 14/4<br>15/24 16/25 17/6 18/5<br>19/23 24/12 25/15<br>29/1 31/12 32/1 32/7<br>32/9 33/15 35/5 39/2<br>40/12 40/21 41/12<br>42/14 43/11 43/16   |   |





|          |  |   |   |   |
|----------|--|---|---|---|
| <b>I</b> | 181/24 184/11 184/16<br>193/17 196/6 196/23<br>197/3 197/5 197/11<br>197/16 201/21 202/2<br>202/7 202/15 202/17<br><b>I ensured [2]</b> 48/20<br>67/22<br><b>I even [1]</b> 179/7<br><b>I found [3]</b> 139/4<br>195/17 195/22<br><b>I got [1]</b> 16/23<br><b>I guess [6]</b> 13/21<br>53/25 66/3 165/14<br>169/20 182/24<br><b>I had [6]</b> 24/12 33/15<br>60/18 68/7 69/1<br>181/11<br><b>I have [31]</b> 2/11 5/12<br>8/13 28/24 53/1 57/22<br>57/25 58/1 60/19<br>61/21 75/3 81/14 86/8<br>90/13 92/19 93/14<br>94/6 100/4 114/24<br>115/20 115/23 116/1<br>117/24 118/8 122/25<br>125/14 133/6 133/9<br>136/7 181/8 202/2<br><b>I haven't [1]</b> 124/17<br><b>I imagine [2]</b> 46/9<br>187/21<br><b>I initiated [1]</b> 181/8<br><b>I interrupted [1]</b><br>16/18<br><b>I just [10]</b> 67/15<br>114/1 117/3 133/9<br>138/12 159/10 167/6<br>173/8 188/11 202/18<br><b>I keep [1]</b> 147/4<br><b>I knew [2]</b> 7/15 31/7<br><b>I know [1]</b> 47/6<br><b>I left [2]</b> 18/13 191/1<br><b>I like [1]</b> 118/20<br><b>I made [2]</b> 18/25 56/1<br><b>I may [7]</b> 22/2 67/13<br>67/13 102/17 119/4<br>120/15 122/6<br><b>I mean [4]</b> 131/6<br>151/7 194/6 201/20<br><b>I mentioned [1]</b> 89/5<br><b>I merged [1]</b> 117/15<br><b>I might [1]</b> 44/22<br><b>I missed [1]</b> 183/11<br><b>I must [1]</b> 73/14<br><b>I needed [1]</b> 182/2<br><b>I obviously [1]</b><br>182/20<br><b>I only [2]</b> 19/11 22/12<br><b>I operated [1]</b> 175/25<br><b>I presume [5]</b> 41/15<br>51/24 66/13 143/18<br>200/1<br><b>I probably [1]</b> 138/11<br><b>I promised [1]</b> 198/8<br><b>I put [1]</b> 190/11 | <b>I read [1]</b> 125/14<br><b>I recall [7]</b> 9/8 11/7<br>20/6 146/14 147/23<br>154/9 194/6<br><b>I received [1]</b> 36/4<br><b>I remember [3]</b> 30/3<br>56/9 181/24<br><b>I remind [1]</b> 2/12<br><b>I report [1]</b> 55/1<br><b>I reported [2]</b> 16/13<br>190/17<br><b>I represent [1]</b> 195/9<br><b>I said [4]</b> 42/17 42/17<br>89/18 179/2<br><b>I saw [1]</b> 171/20<br><b>I say [2]</b> 8/8 180/12<br><b>I see [2]</b> 54/16<br>192/10<br><b>I seem [2]</b> 47/25<br>127/7<br><b>I seemed [1]</b> 90/12<br><b>I seen [1]</b> 114/25<br><b>I shall [1]</b> 138/16<br><b>I should [4]</b> 2/14<br>81/17 107/16 202/17<br><b>I showed [2]</b> 137/17<br>193/5<br><b>I start [1]</b> 4/22<br><b>I still [1]</b> 91/2<br><b>I structured [1]</b> 33/10<br><b>I submitted [2]</b> 6/15<br>6/17<br><b>I suggest [1]</b> 128/3<br><b>I suspect [6]</b> 30/13<br>30/22 72/7 96/15<br>140/8 186/11<br><b>I take [1]</b> 119/20<br><b>I talk [1]</b> 117/3<br><b>I therefore [1]</b> 178/13<br><b>I think [59]</b> 1/19 4/13<br>4/24 5/19 11/25 16/20<br>16/23 20/2 30/18<br>32/25 33/25 47/6<br>56/18 57/12 57/20<br>58/8 62/8 64/3 79/23<br>91/17 93/3 94/10<br>100/24 105/6 105/9<br>105/9 118/6 118/8<br>118/9 126/4 126/24<br>130/23 132/16 134/22<br>137/15 137/18 138/16<br>138/24 139/9 142/3<br>143/1 144/7 154/22<br>154/23 155/13 155/14<br>158/16 161/4 166/5<br>170/10 171/20 171/21<br>180/13 183/21 186/3<br>187/1 188/3 195/2<br>196/10<br><b>I thought [3]</b> 17/25<br>58/6 92/15<br><b>I took [2]</b> 15/14<br>189/20<br><b>I turn [2]</b> 20/18 | 184/13<br><b>I understand [5]</b><br>16/25 26/6 49/17<br>51/18 52/11<br><b>I understood [1]</b><br>178/12<br><b>I want [2]</b> 20/22<br>94/23<br><b>I wanted [3]</b> 14/19<br>15/3 36/14<br><b>I was [23]</b> 7/15 7/21<br>16/21 19/10 25/1 25/1<br>35/14 39/23 45/1<br>74/12 77/3 90/21<br>121/15 155/13 158/2<br>176/4 176/12 176/24<br>178/10 182/13 185/2<br>185/2 187/12<br><b>I wasn't [8]</b> 18/18<br>51/23 69/18 121/16<br>148/3 154/14 172/19<br>193/10<br><b>I went [1]</b> 15/25<br><b>I will [5]</b> 2/24 75/9<br>117/14 133/18 150/14<br><b>I wonder [3]</b> 64/6<br>80/4 119/17<br><b>I would [22]</b> 24/12<br>42/22 43/4 45/14<br>45/15 53/3 57/8 93/6<br>102/9 102/23 118/24<br>119/13 120/15 125/16<br>133/21 148/13 164/18<br>172/10 183/8 186/11<br>193/18 200/19<br><b>I wouldn't [7]</b> 53/20<br>62/23 77/23 77/25<br>105/1 105/14 173/15<br><b>I'd [36]</b> 14/15 33/25<br>53/11 54/14 64/20<br>67/15 71/14 71/17<br>100/16 101/22 102/8<br>102/10 105/14 109/18<br>113/5 114/16 114/25<br>117/13 119/11 128/17<br>128/24 135/10 138/8<br>140/11 147/6 161/18<br>163/6 163/12 169/2<br>169/20 169/22 172/16<br>179/4 183/9 183/13<br>192/11<br><b>I'll [6]</b> 93/15 135/20<br>136/7 179/13 191/4<br>195/13<br><b>I'm [47]</b> 6/16 18/19<br>18/20 21/4 25/1 27/10<br>27/12 30/8 44/7 45/17<br>45/18 53/22 61/24<br>68/24 69/17 77/3 77/6<br>78/7 79/1 92/5 93/8<br>94/25 98/21 102/17<br>106/6 108/21 119/15<br>119/22 124/13 131/8<br>131/21 143/13 147/14 | 149/12 159/10 166/14<br>172/4 180/5 185/25<br>190/18 191/21 192/11<br>193/3 193/17 193/18<br>197/19 203/2<br><b>I've [30]</b> 3/11 24/9<br>24/13 43/4 54/11 60/8<br>61/25 72/12 72/24<br>74/23 76/7 78/18 94/5<br>94/8 94/21 101/10<br>104/22 106/2 107/16<br>116/19 119/5 122/5<br>124/15 132/15 143/23<br>173/16 178/9 180/15<br>201/18 201/20<br><b>Iain [3]</b> 118/11<br>142/12 149/16<br><b>Ian [1]</b> 144/1<br><b>idea [12]</b> 43/4 74/17<br>74/23 75/3 78/21 86/8<br>92/19 93/14 115/20<br>115/23 116/1 118/20<br><b>identifiable [1]</b> 70/24<br><b>identification [8]</b><br>114/9 114/12 115/9<br>115/22 115/25 116/4<br>116/6 119/8<br><b>identified [8]</b> 23/24<br>104/23 109/4 110/6<br>163/8 188/17 189/1<br>189/9<br><b>identify [9]</b> 29/1<br>34/14 91/25 95/4<br>95/14 96/19 97/12<br>99/25 175/2<br><b>identity [1]</b> 116/11<br><b>ie [19]</b> 9/14 11/8<br>22/15 36/7 42/24<br>44/13 45/12 58/13<br>62/14 71/25 84/10<br>91/25 116/13 126/12<br>143/7 144/11 150/25<br>152/12 167/25<br><b>ie at [1]</b> 71/25<br><b>ie criminal/civil [1]</b><br>144/11<br><b>ie from [1]</b> 22/15<br><b>ie identify [1]</b> 91/25<br><b>ie in [1]</b> 9/14<br><b>ie Jason [1]</b> 143/7<br><b>ie scrap [1]</b> 42/24<br><b>ie Security [1]</b> 36/7<br><b>ie shaking [1]</b> 152/12<br><b>ie that [1]</b> 126/12<br><b>ie the [1]</b> 44/13<br><b>ie their [1]</b> 116/13<br><b>ie until [1]</b> 11/8<br><b>ie we're [1]</b> 167/25<br><b>ie what's [1]</b> 45/12<br><b>ie why [1]</b> 150/25<br><b>ie with [1]</b> 84/10<br><b>ie you [1]</b> 62/14<br><b>if [164]</b> 2/6 2/18 3/5<br>3/7 3/19 4/13 5/6 |
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|--|--|--|---|--|
| <b>I</b>   | <b>immediately [2]</b> 2/23<br>107/20  | <b>incrimination [2]</b><br>2/11 3/6   | <b>insofar [2]</b> 13/12<br>109/13  | 154/10 156/9 158/24<br>160/10 173/12   |
| <b>if...</b> [157] 10/20 13/3<br>14/21 15/19 15/22<br>16/6 17/25 24/12<br>26/11 26/15 30/24<br>34/11 36/15 37/9<br>37/14 37/16 38/10<br>38/11 38/15 38/16<br>38/19 38/21 43/14<br>44/8 44/19 44/25<br>47/10 47/11 49/9<br>49/10 50/1 50/13<br>53/14 54/16 55/6<br>57/21 57/23 58/2 61/4<br>61/25 62/8 65/17<br>65/22 70/10 71/3<br>74/24 76/13 77/17<br>77/23 78/18 80/4<br>80/25 81/17 81/25<br>83/16 84/5 84/15<br>84/22 86/12 90/12<br>91/6 91/21 91/22<br>94/18 95/2 98/22<br>104/15 106/20 106/21<br>107/14 107/25 108/10<br>111/22 114/22 116/3<br>116/9 119/23 120/15<br>120/22 123/4 123/8<br>123/14 124/5 124/10<br>126/15 126/25 128/8<br>129/22 131/1 131/24<br>135/12 135/19 136/20<br>138/10 138/18 138/19<br>139/9 141/22 142/20<br>143/9 147/3 148/5<br>148/6 148/21 149/8<br>154/20 155/8 155/14<br>155/16 155/18 156/14<br>156/20 157/11 158/4<br>158/6 158/8 159/25<br>160/4 160/19 162/9<br>162/24 163/6 163/7<br>163/12 163/14 163/19<br>165/20 166/11 166/16<br>171/6 172/22 173/16<br>176/2 177/10 177/24<br>178/4 180/5 180/20<br>182/6 182/17 183/8<br>183/13 185/9 191/3<br>191/5 192/4 193/5<br>194/6 195/14 197/20<br>198/3 199/8 200/9<br>200/19 200/20 200/21<br>202/16 | <b>immersed [1]</b> 129/1<br><b>impact [5]</b> 38/9 61/10<br>63/21 156/24 163/9<br><b>impacted [3]</b> 148/4<br>163/5 163/11<br><b>impart [1]</b> 58/1<br><b>impending [1]</b><br>124/11<br><b>imperative [4]</b><br>130/16 155/20 158/12<br>160/3<br><b>implement [1]</b> 88/13<br><b>implications [1]</b><br>199/9<br><b>importance [1]</b><br>157/22<br><b>important [9]</b> 63/20<br>82/24 83/12 86/9<br>95/11 124/11 153/21<br>171/5 189/18<br><b>impossible [1]</b><br>123/21<br><b>impress [1]</b> 157/21<br><b>impression [2]</b> 90/21<br>182/17<br><b>imprisonments [1]</b><br>171/14<br><b>improvement [1]</b><br>164/22<br><b>inaccurate [2]</b> 99/12<br>99/14<br><b>inadequacy [2]</b> 99/15<br>99/19<br><b>inappropriate [5]</b><br>75/22 79/9 79/20 89/8<br>155/23<br><b>inception [2]</b> 156/4<br>161/23<br><b>include [9]</b> 8/11<br>25/18 50/22 75/21<br>109/14 109/19 111/25<br>114/9 173/20<br><b>included [12]</b> 79/9<br>109/12 112/5 113/18<br>113/21 155/3 159/19<br>163/17 165/6 165/8<br>173/21 193/22<br><b>including [17]</b> 13/20<br>24/8 57/9 74/9 80/9<br>83/21 94/13 111/17<br>128/10 149/10 163/9<br>163/21 165/24 183/14<br>187/9 191/15 195/10<br><b>incomplete [1]</b> 69/24<br><b>inconsistent [1]</b><br>143/3<br><b>incorporating [1]</b><br>164/7<br><b>increase [2]</b> 155/4<br>190/8<br><b>incriminate [2]</b> 2/8<br>2/22 | <b>indeed [3]</b> 155/6<br>172/17 173/1<br><b>independent [21]</b><br>28/7 125/9 131/4<br>136/10 137/18 139/18<br>140/1 146/3 152/6<br>152/16 154/8 158/20<br>167/14 167/17 167/23<br>169/14 170/4 171/24<br>172/2 173/4 195/20<br><b>indicate [6]</b> 77/11<br>99/9 99/15 99/17<br>99/19 99/21<br><b>indicated [1]</b> 98/3<br><b>indicating [1]</b> 196/18<br><b>indication [1]</b> 153/7<br><b>individual [3]</b> 98/18<br>112/23 133/13<br><b>individuals [3]</b><br>131/15 131/22 132/3<br><b>industry [1]</b> 5/15<br><b>inescapable [1]</b><br>127/13<br><b>inevitable [1]</b> 157/17<br><b>Inevitably [1]</b> 156/14<br><b>inferences [1]</b> 102/2<br><b>info [1]</b> 136/3<br><b>inform [1]</b> 82/19<br><b>informal [2]</b> 69/21<br>72/3<br><b>information [43]</b> 18/6<br>21/2 23/23 24/21<br>25/18 46/22 47/19<br>50/21 52/16 59/10<br>61/15 66/10 68/5 76/9<br>77/10 82/5 95/15<br>95/19 95/25 96/1<br>96/11 96/18 97/1 97/2<br>99/6 116/21 133/10<br>134/9 134/17 134/20<br>135/3 136/4 136/7<br>142/13 144/6 145/11<br>145/12 148/11 150/17<br>175/1 175/4 188/12<br>198/25<br><b>informed [4]</b> 25/13<br>48/22 50/17 176/4<br><b>informing [4]</b> 86/16<br>86/21 93/3 105/25<br><b>initial [6]</b> 90/16 91/8<br>91/10 134/7 175/12<br>189/13<br><b>initiated [1]</b> 181/8<br><b>initiative [1]</b> 186/20<br><b>innocent [2]</b> 166/20<br>167/4<br><b>input [5]</b> 160/7 160/9<br>164/8 164/11 165/2<br><b>inquiry [8]</b> 1/12 1/16<br>1/17 2/3 2/5 113/13<br>160/2 191/9<br><b>insist [1]</b> 129/11 | <b>inspiration [1]</b> 50/10<br><b>instance [1]</b> 140/2<br><b>instead [2]</b> 46/7<br>54/22<br><b>instigated [1]</b> 182/4<br><b>instigating [1]</b> 100/8<br><b>instigation [1]</b><br>181/18<br><b>institution [1]</b> 182/23<br><b>instruct [1]</b> 71/15<br><b>instructed [3]</b> 41/18<br>42/14 90/24<br><b>instructing [1]</b> 86/14<br><b>instruction [26]</b> 35/5<br>40/10 42/15 43/8<br>43/11 43/16 43/21<br>44/5 44/16 44/19 45/6<br>45/23 52/19 52/23<br>53/4 53/8 53/10 53/24<br>54/7 54/19 55/25<br>71/22 72/6 88/16<br>112/5 190/12<br><b>instructions [7]</b> 37/5<br>71/12 78/12 117/2<br>119/6 132/11 174/4<br><b>insufficiency [1]</b><br>99/16<br><b>insufficiently [1]</b><br>125/13<br><b>integrity [77]</b> 11/10<br>19/4 19/9 34/14 59/1<br>61/10 62/18 63/21<br>65/4 65/10 65/15<br>65/19 67/3 72/21<br>72/23 74/18 75/1<br>77/14 82/12 109/2<br>109/5 109/9 109/13<br>109/19 110/25 111/3<br>112/7 121/10 121/13<br>122/2 122/8 122/13<br>125/19 128/1 129/5<br>129/7 129/18 130/18<br>133/15 139/8 142/18<br>144/19 145/5 145/25<br>146/4 146/6 146/20<br>147/10 148/7 151/16<br>151/24 153/22 155/24<br>160/1 160/4 160/11<br>161/11 161/14 162/23<br>173/20 173/22 174/12<br>179/17 179/24 184/2<br>184/10 196/1 197/14<br>199/2 199/12 200/4<br>200/5 200/25 201/6<br>202/1 202/6 202/11<br><b>intelligence [1]</b> 175/1<br><b>interest [4]</b> 128/21<br>128/21 144/1 174/25<br><b>interests [1]</b> 96/6<br><b>interim [4]</b> 92/14<br>92/15 92/16 93/10<br><b>internal [6]</b> 70/14 | <b>international [2]</b> 8/21<br>9/1<br><b>interpret [1]</b> 133/13<br><b>interpretation [4]</b><br>62/9 63/3 66/14<br>158/17<br><b>interpreted [1]</b> 42/20<br><b>interrupted [1]</b> 16/18<br><b>intervening [1]</b><br>154/15<br><b>intervention [1]</b> 51/3<br><b>interventions [1]</b><br>187/24<br><b>interview [6]</b> 91/1<br>104/7 108/4 108/5<br>108/8 108/9<br><b>into [30]</b> 14/17 16/4<br>23/18 29/16 30/9<br>35/16 47/8 49/23<br>50/25 73/15 75/15<br>85/7 85/10 90/7 96/2<br>96/22 131/25 132/10<br>144/17 146/3 151/16<br>152/15 164/11 186/10<br>190/15 190/16 190/17<br>190/18 193/10 194/25<br><b>introduced [1]</b> 77/17<br><b>introducing [1]</b><br>118/15<br><b>introduction [1]</b><br>180/8<br><b>investigate [8]</b> 14/21<br>85/13 146/20 151/24<br>158/5 158/7 158/13<br>159/6<br><b>investigated [6]</b><br>15/19 15/22 151/17<br>153/5 188/23 199/3<br><b>investigating [6]</b><br>15/6 15/13 18/22<br>100/8 145/24 146/5<br><b>investigation [40]</b><br>14/10 14/16 14/18<br>16/3 20/24 106/14<br>106/25 107/10 107/23<br>108/3 108/15 109/15<br>110/19 112/20 117/10<br>117/20 128/9 152/2<br>152/17 154/10 156/10<br>156/11 156/15 156/20<br>157/9 157/13 157/14<br>158/21 158/25 165/16<br>165/21 171/7 178/16<br>178/25 181/10 182/15<br>187/9 189/14 192/1<br>200/16<br><b>investigations [15]</b><br>8/2 15/2 16/5 31/24<br>135/11 139/21 148/4<br>151/16 154/1 176/9<br>176/13 178/8 182/9<br>183/25 184/4 |

|   |   |   |  |  |
|---|---|---|--|--|
| <b>I</b>  | 72/23 74/5 74/9 74/12<br>74/18 75/1 75/20<br>77/14 81/13 82/5<br>83/14 83/20 83/25<br>86/17 86/23 90/14<br>90/21 90/25 91/4<br>91/15 91/17 92/1 92/1<br>92/4 93/12 95/11<br>100/15 104/23 109/15<br>109/19 110/1 112/1<br>112/7 112/13 130/7<br>142/17 143/21 145/13<br>148/3 148/14 151/16<br>153/22 165/3 165/11<br>166/3 174/18 179/17<br>179/24 184/2 190/16<br>198/22 199/2 201/6  | <b>itself [10]</b> 24/3 48/4<br>80/20 94/22 131/18<br>158/24 167/7 167/9<br>170/1 176/16<br><b>iv [1]</b> 55/12   | 79/12 80/4 89/16 90/2<br>92/5 93/13 94/18<br>102/23 103/10 106/21<br>110/13 110/14 110/14<br>114/1 117/3 117/5<br>119/16 119/25 120/22<br>121/11 121/23 123/4<br>126/4 128/21 129/23<br>130/14 133/9 137/1<br>137/16 138/12 138/19<br>147/20 149/6 155/14<br>159/10 161/14 167/6<br>169/22 173/8 173/16<br>178/9 180/25 183/11<br>183/19 185/10 188/11<br>191/3 191/4 191/21<br>195/11 196/24 197/8<br>197/20 198/3 198/10<br>199/20 200/14 201/3<br>201/20 201/25 202/18<br>203/2 | 52/8 53/18 55/15<br>57/23 57/24 58/11<br>60/25 65/12 65/16<br>66/5 68/11 76/17<br>78/20 81/17 89/20<br>91/5 91/16 91/23<br>100/15 102/23 113/9<br>113/22 116/5 119/25<br>124/21 129/3 133/9<br>134/13 135/10 136/9<br>138/18 139/9 147/25<br>150/24 154/13 159/2<br>160/13 161/24 164/10<br>165/18 165/22 170/20<br>170/25 173/13 173/23<br>181/24 182/2 196/5<br>200/14 202/15 202/18 |
| <b>investigative [5]</b><br>87/25 176/6 178/13<br>178/24 189/18   | <b>issuing [3]</b> 117/1<br>117/23 119/1  | <b>J</b>  | <b>knowing [3]</b> 106/5<br>157/9 172/14   |  |
| <b>investigator [4]</b><br>39/14 109/7 111/4<br>115/17  | <b>it [413]</b>   | <b>Jane [1]</b> 190/23  | <b>knowledge [18]</b> 4/1<br>4/19 10/16 40/25<br>51/20 53/4 88/14<br>100/4 125/18 133/6<br>133/9 141/6 141/7<br>157/12 157/19 166/9<br>166/22 175/23   |  |
| <b>investigators [8]</b><br>90/24 143/17 143/20<br>153/14 176/7 178/8<br>178/11 178/14  | <b>it'll [1]</b> 5/7  | <b>Jarnail [7]</b> 41/20<br>42/12 47/1 47/15 79/2<br>79/4 90/5  | <b>known [17]</b> 2/9 26/14<br>27/21 77/23 77/25<br>163/6 163/12 173/16<br>196/3 200/2 200/4<br>200/25 201/8 201/9<br>201/12 201/13 201/24   |  |
| <b>invited [1]</b> 158/3  | <b>it's [109]</b> 4/13 4/24<br>5/19 7/7 7/20 13/22<br>15/5 17/25 20/21 23/2<br>24/8 26/13 33/3 37/16<br>37/18 38/15 38/15<br>38/16 38/19 38/20<br>40/18 42/1 43/19<br>47/10 47/10 47/11<br>49/10 49/10 49/10<br>49/11 50/1 50/1 53/20<br>55/3 55/3 55/5 55/5<br>55/7 60/8 60/9 63/7<br>64/1 64/3 65/21 65/22<br>68/9 69/3 69/8 70/22<br>70/24 70/25 71/3 80/3<br>87/7 87/9 92/11 93/25<br>94/24 95/1 106/17<br>107/17 114/14 114/16<br>115/11 119/11 119/12<br>119/16 121/1 121/4<br>124/6 124/11 129/23<br>138/10 146/18 147/23<br>158/14 158/16 167/9<br>168/20 169/2 170/8<br>172/3 172/5 172/6<br>177/11 179/14 180/7<br>181/17 182/25 188/20<br>191/24 191/25 192/6<br>192/8 192/13 192/24<br>193/19 194/7 194/23<br>194/23 195/13 195/14<br>196/23 197/3 197/19<br>201/11 201/15 201/23<br>201/24 | <b>Jason [3]</b> 1/11<br>141/25 143/7   | <b>John [16]</b> 1/6 1/8<br>1/14 60/17 78/10 79/3<br>79/5 91/5 91/6 91/22<br>91/22 131/22 135/14<br>143/8 198/7 204/2  | <b>label [1]</b> 106/14  |
| <b>involve [1]</b> 179/1  | <b>job [3]</b> 8/24 20/8<br>102/22  | <b>Jenkins [9]</b> 27/14<br>27/15 27/20 28/4<br>28/10 30/6 30/11<br>30/20 133/12  | <b>lacked [2]</b> 130/18<br>161/11   |  |
| <b>involved [19]</b> 9/10<br>18/18 26/20 53/22<br>59/14 73/18 105/15<br>117/10 118/25 119/12<br>135/21 139/9 159/18<br>160/6 160/16 169/3<br>173/17 176/12 196/9  | <b>John L's [1]</b> 143/8   | <b>Jenkins' [3]</b> 27/24<br>28/14 29/17  | <b>language [5]</b> 49/1<br>49/20 63/15 63/19<br>182/25  |  |
| <b>involvement [1]</b><br>179/18  | <b>joining [2]</b> 8/17 40/18   | <b>Jennings [1]</b> 27/14   | <b>large [4]</b> 26/22 121/4<br>128/18 175/20  |  |
| <b>involving [3]</b> 70/13<br>90/5 141/19   | <b>Jon [3]</b> 139/5 143/14<br>195/23   | <b>Jessica [1]</b> 121/3  | <b>largest [1]</b> 15/1  |  |
| <b>Ireland [1]</b> 179/8  | <b>Jon Longman [2]</b><br>143/14 195/23   | <b>JFSA [6]</b> 80/11 81/21<br>121/15 121/21 121/22<br>121/25   | <b>last [18]</b> 3/19 18/1<br>26/11 75/8 75/17<br>76/12 78/11 91/21<br>94/4 94/9 140/22<br>164/17 165/7 169/21<br>176/15 189/25 191/5<br>197/4   |  |
| <b>irrespective [1]</b><br>107/7  | <b>Jones [1]</b> 195/3  | <b>John's [1]</b> 143/8   | <b>late [5]</b> 100/14<br>132/17 132/18 132/18<br>147/24   |  |
| <b>is [323]</b>   | <b>JS [7]</b> 41/15 42/6<br>79/1 79/3 179/23<br>179/24 180/2  | <b>join [2]</b> 79/20 89/8  | <b>later [5]</b> 12/8 22/25<br>78/23 90/4 132/16   |  |
| <b>ismay [22]</b> 120/17<br>136/21 137/13 139/24<br>140/5 140/23 149/10<br>149/24 163/15 163/20<br>164/6 164/12 167/7<br>167/9 167/15 169/13<br>171/5 173/5 195/18<br>196/19 201/4 201/25                           | <b>JScott [3]</b> 41/17 42/9<br>42/14   | <b>joined [1]</b> 90/2  | <b>latest [1]</b> 164/7  |  |
| <b>ismay's [2]</b> 152/24<br>173/13   | <b>Judge [1]</b> 127/10   | <b>joining [2]</b> 8/17 40/18   | <b>latter [3]</b> 24/14 24/16<br>158/10  |  |
| <b>isn't [18]</b> 4/24 38/17<br>38/22 47/12 55/9<br>65/24 68/1 68/10<br>68/22 69/4 69/9 71/1<br>86/14 93/9 112/16<br>146/9 147/21 153/8   | <b>judged [1]</b> 104/12  | <b>Jon [3]</b> 139/5 143/14<br>195/23   | <b>launched [1]</b> 20/4   |  |
| <b>isolated [1]</b> 201/11  | <b>July [25]</b> 13/23 21/11<br>22/18 22/23 23/7 24/4<br>26/10 26/13 32/5<br>32/14 32/17 33/4 39/5<br>39/9 40/14 40/16 41/6<br>41/13 41/16 42/13<br>49/3 52/13 80/2 86/15<br>101/6  | <b>Jon Longman [2]</b><br>143/14 195/23   | <b>Laundrying [1]</b> 5/16   |  |
| <b>issue [27]</b> 3/5 14/11<br>20/19 38/8 54/6 55/23<br>73/10 73/12 73/23<br>124/20 135/20 143/24<br>157/20 170/15 174/4<br>199/14 200/3 200/4<br>201/1 201/8 201/12<br>201/14 201/16 201/23<br>201/24 202/5 202/11 | <b>June [1]</b> 198/24  | <b>June 2010 [1]</b> 198/24   |  |  |
| <b>issued [1]</b> 20/4  | <b>June 2010 [1]</b> 198/24   | <b>just [87]</b> 1/25 3/3<br>3/11 7/10 10/16 10/20<br>15/5 21/22 22/13<br>22/16 23/6 27/11 36/3<br>43/6 44/2 44/13 48/4<br>49/14 53/2 61/3 63/14<br>67/15 70/2 71/18 77/6 |  |  |
| <b>issues [77]</b> 9/14 9/19<br>11/10 20/19 22/20<br>23/9 23/17 23/24<br>25/15 32/17 34/14<br>35/1 39/9 40/4 41/17<br>50/18 56/16 56/18<br>59/9 61/10 62/17<br>63/20 70/15 72/21                                    | <b>item [2]</b> 165/4 166/4   | <b>just [87]</b> 1/25 3/3<br>3/11 7/10 10/16 10/20<br>15/5 21/22 22/13<br>22/16 23/6 27/11 36/3<br>43/6 44/2 44/13 48/4<br>49/14 53/2 61/3 63/14<br>67/15 70/2 71/18 77/6 |  |  |
|   | <b>items [2]</b> 104/11<br>145/14   |   |  |  |
|   | <b>its [18]</b> 1/16 13/20<br>25/2 31/12 60/22 84/6<br>84/17 86/13 96/22<br>109/15 134/17 147/7<br>160/4 170/6 171/10<br>193/3 193/21 197/12  |   |  |  |

|                              |                               |                               |                              |                            |
|------------------------------|-------------------------------|-------------------------------|------------------------------|----------------------------|
| <b>L</b>                     | <b>Legal' [1]</b> 107/23      | 149/14 154/23 155/10          | 145/4 146/11 147/17          | 150/14 170/22 192/15       |
| <b>law [11]</b> 2/9 7/25     | <b>legally [1]</b> 1/22       | 163/22 191/12 191/16          | 147/18 151/11 153/18         | 198/12                     |
| 87/17 88/3 98/6 98/7         | <b>legislation [1]</b> 188/25 | 191/23 193/13                 | 165/15 166/7 179/12          | <b>maker [2]</b> 114/9     |
| 101/1 107/1 145/22           | <b>less [7]</b> 13/2 65/13    | <b>listed [6]</b> 32/20 32/24 | 181/5 185/21 197/11          | 181/2                      |
| 155/2 172/16                 | 69/3 69/8 96/13 105/9         | 108/1 118/8 188/7             | 201/11                       | <b>makes [1]</b> 37/20     |
| <b>lawyer [13]</b> 21/15     | 117/22                        | 194/4                         | <b>looks [3]</b> 69/23       | <b>making [10]</b> 18/23   |
| 21/20 21/22 21/23            | <b>let [9]</b> 48/18 57/23    | <b>literally [1]</b> 201/20   | 138/25 188/10                | 49/5 49/8 51/25 80/17      |
| 36/20 37/22 47/4             | 57/24 81/17 112/24            | <b>litigation [13]</b> 20/4   | <b>lose [1]</b> 58/6         | 115/21 140/7 169/6         |
| 49/12 73/18 121/2            | 113/9 119/25 173/5            | 20/11 38/9 83/17 84/4         | <b>loss [6]</b> 8/25 175/5   | 169/10 181/15              |
| 122/18 159/18 159/19         | 200/14                        | 84/7 84/8 84/19 98/6          | 175/13 188/22 190/2          | <b>man [1]</b> 21/12       |
| <b>lawyers [28]</b> 2/19 3/8 | <b>let's [6]</b> 42/11 45/25  | 123/17 157/25 198/15          | 190/11                       | <b>manage [6]</b> 73/23    |
| 29/9 31/25 49/7 49/9         | 69/14 161/11 197/17           | 199/17                        | <b>losses [7]</b> 15/1 74/10 | 74/17 125/11 164/8         |
| 53/20 57/12 59/5             | 199/20                        | <b>little [8]</b> 11/24 90/12 | 175/2 186/20 187/6           | 175/18 182/2               |
| 59/19 59/24 59/25            | <b>letter [1]</b> 58/10       | 110/14 120/22 129/23          | 187/22 188/17                | <b>managed [5]</b> 73/6    |
| 62/25 63/2 63/2 70/13        | <b>letters [6]</b> 12/10      | 135/17 144/13 145/18          | <b>lost [3]</b> 44/7 127/9   | 73/10 74/13 75/1           |
| 86/25 87/8 89/21             | 12/13 15/16 80/16             | <b>live [7]</b> 139/10 194/7  | 190/6                        | 177/1                      |
| 112/9 112/11 112/21          | 81/20 124/16                  | 194/24 196/10 196/16          | <b>lot [2]</b> 85/18 85/19   | <b>management [9]</b>      |
| 119/24 161/18 179/4          | <b>level [17]</b> 9/14 10/17  | 197/8 197/10                  | <b>lots [4]</b> 7/9 44/3     | 5/12 7/4 13/5 13/7         |
| 179/9 183/4 203/3            | 48/8 101/18 104/25            | <b>location [2]</b> 23/19     | 104/3 104/3                  | 74/6 114/2 118/1           |
| <b>lay [3]</b> 58/4 58/14    | 116/1 118/24 119/13           | 107/7                         | <b>Lowther [10]</b> 126/19   | 177/12 178/6               |
| 59/4                         | 125/1 133/6 133/10            | <b>log [11]</b> 56/11 56/14   | 134/2 134/11 134/19          | <b>manager [17]</b> 10/5   |
| <b>Layout [1]</b> 106/13     | 137/3 137/3 140/12            | 127/3 127/5 127/24            | 134/25 134/25 142/25         | 16/13 17/9 30/13           |
| <b>lead [5]</b> 34/1 74/10   | 151/19 152/19 153/10          | 128/6 129/6 129/8             | 150/14 163/22 163/25         | 31/17 33/6 33/20           |
| 156/22 178/2 186/19          | <b>levels [1]</b> 165/9       | 131/23 132/4 133/13           | <b>lunch [2]</b> 119/22      | 39/13 48/5 53/13           |
| <b>leader [2]</b> 40/24      | <b>liaison [1]</b> 77/13      | <b>logic [2]</b> 124/12       | 164/20                       | 69/16 75/5 92/21 93/6      |
| 111/23                       | <b>lie [2]</b> 59/15 59/20    | 127/12                        | <b>lying [5]</b> 58/5 58/15  | 149/17 181/1 182/13        |
| <b>leaders [1]</b> 178/7     | <b>light [3]</b> 129/3 184/1  | <b>logs [3]</b> 125/22 130/5  | 59/4 59/11 59/15             | <b>managers [2]</b> 107/7  |
| <b>leadership [1]</b> 13/20  | 199/15                        | 139/14                        | <b>M</b>                     | 119/13                     |
| <b>leading [1]</b> 142/25    | <b>like [19]</b> 10/15 41/25  | <b>London [1]</b> 19/14       | <b>made [34]</b> 3/23 18/25  | <b>mandate [3]</b> 90/16   |
| <b>leads [1]</b> 134/9       | 42/24 53/24 60/20             | <b>long [4]</b> 5/22 124/10   | 32/1 35/2 40/5 45/2          | 91/8 91/10                 |
| <b>leak [1]</b> 112/25       | 67/15 100/13 100/19           | 124/25 126/25                 | 48/20 50/25 56/1             | <b>Mandy [19]</b> 121/1    |
| <b>learn [1]</b> 121/24      | 118/20 118/22 120/15          | <b>longer [2]</b> 30/4        | 61/17 61/19 73/2             | 121/7 122/18 123/4         |
| <b>least [5]</b> 28/13       | 122/19 123/8 130/24           | 124/13                        | 90/17 91/2 91/9 91/13        | 124/3 124/9 129/23         |
| 125/13 126/9 161/20          | 138/4 138/25 147/2            | <b>Longman [3]</b> 139/5      | 94/10 101/7 101/10           | 134/6 135/16 135/19        |
| 186/21                       | 158/9 173/2                   | 143/14 195/23                 | 101/12 101/24 107/2          | 136/2 136/22 137/9         |
| <b>leave [8]</b> 29/12 62/21 | <b>likelihood [2]</b> 111/13  | <b>look [51]</b> 5/9 23/2     | 109/9 111/6 132/6            | 137/12 139/9 149/25        |
| 68/12 92/18 93/2             | 112/2                         | 26/16 27/9 32/15              | 137/20 139/20 148/22         | 150/12 163/21 196/9        |
| 93/15 119/13 135/20          | <b>likely [9]</b> 24/9 69/3   | 37/14 37/15 46/25             | 156/1 164/9 179/16           | <b>manner [3]</b> 73/8     |
| <b>leaves [4]</b> 63/17      | 69/8 69/24 133/24             | 47/8 50/13 57/2 61/3          | 183/4 183/25 186/16          | 74/14 128/3                |
| 68/15 68/19 71/3             | 135/15 169/2 181/3            | 62/8 64/18 78/3 78/25         | <b>Madron [1]</b> 121/3      | <b>Mantle [1]</b> 149/14   |
| <b>leaving [4]</b> 20/14     | 184/11                        | 80/2 87/13 90/7 90/8          | <b>magazine [6]</b> 137/25   | <b>manuscript [1]</b> 81/9 |
| 93/8 93/17 130/5             | <b>Lillywhite [1]</b> 197/22  | 93/19 94/22 102/18            | 138/2 138/3 138/10           | <b>many [15]</b> 103/6     |
| <b>led [4]</b> 132/7 134/19  | <b>limit [2]</b> 38/7 82/15   | 103/20 106/7 107/14           | 143/24 144/7                 | 105/4 113/14 116/15        |
| 179/20 201/13                | <b>limited [13]</b> 7/9 10/10 | 118/14 123/2 124/5            | <b>mail [16]</b> 8/21 9/1    | 116/16 116/17 117/11       |
| <b>left [17]</b> 6/8 12/3    | 10/18 28/11 95/13             | 133/4 136/7 136/20            | 11/20 11/23 12/6             | 117/12 117/19 121/7        |
| 12/11 15/25 17/16            | 106/11 107/22 108/14          | 141/22 147/8 162/3            | 12/10 12/11 12/12            | 121/12 122/11 134/20       |
| 18/13 20/2 20/5 63/23        | 110/19 151/1 175/24           | 163/14 167/13 167/25          | 12/16 12/22 17/2 17/7        | 161/9 203/1                |
| 92/9 92/25 93/3 104/5        | 192/21 201/23                 | 168/2 169/24 173/19           | 181/21 192/12 193/19         | <b>March [2]</b> 144/15    |
| 117/19 156/5 175/25          | <b>limits [1]</b> 170/18      | 178/5 182/6 185/8             | 194/1                        | 198/18                     |
| 191/1                        | <b>Lin [1]</b> 121/2          | 186/15 188/1 188/12           | <b>main [1]</b> 166/2        | <b>March 2010 [1]</b>      |
| <b>left-hand [1]</b> 104/5   | <b>line [25]</b> 12/18 12/19  | 191/13 191/21 197/10          | <b>mainly [1]</b> 145/14     | 198/18                     |
| <b>Legacy [1]</b> 148/1      | 13/4 13/7 13/23 16/13         | 197/18                        | <b>maintain [2]</b> 91/2     | <b>mark [2]</b> 84/20      |
| <b>legal [35]</b> 2/6 62/10  | 17/9 30/13 31/17              | <b>looked [12]</b> 32/7 44/2  | 133/15                       | 104/14                     |
| 63/4 63/12 64/4 69/12        | 33/20 35/3 53/13              | 44/14 50/9 50/11              | <b>maintained [4]</b> 56/22  | <b>Marsh [7]</b> 11/17     |
| 73/8 73/11 73/12             | 71/18 71/25 75/5 91/8         | 56/22 70/21 102/17            | 68/23 125/20 127/25          | 11/19 12/15 12/15          |
| 73/21 73/24 74/1 74/3        | 91/21 92/21 93/6              | 123/18 137/1 145/11           | 143/24 144/7                 | 13/22 17/7 176/5           |
| 74/14 74/19 75/2             | 96/25 118/18 175/10           | 147/8                         | <b>maintains [1]</b> 129/4   | <b>Martin [9]</b> 36/16    |
| 76/22 77/13 84/6             | 176/15 180/25 182/13          | <b>looking [35]</b> 15/13     | <b>majority [1]</b> 6/6      | 36/17 36/19 41/9 47/1      |
| 84/16 85/7 85/10             | <b>line 30 [1]</b> 13/23      | 20/19 21/10 23/5              | <b>make [23]</b> 2/15 6/18   | 47/5 78/5 79/6 94/9        |
| 86/18 86/22 87/8 91/1        | <b>lines [2]</b> 37/6 176/11  | 31/19 33/22 34/5 35/8         | 6/21 15/21 79/19 85/8        | <b>massive [1]</b> 156/22  |
| 102/11 102/21 108/15         | <b>Lisa [1]</b> 143/14        | 36/4 36/13 45/9 56/18         | 86/3 86/25 87/8 87/9         | <b>material [34]</b> 21/2  |
| 108/17 155/7 168/8           | <b>list [16]</b> 25/18 50/21  | 57/4 62/23 63/10              | 102/4 112/22 113/20          | 27/20 28/14 28/22          |
| 183/16 183/20 191/20         | 57/16 81/15 81/16             | 64/19 86/1 92/6 93/13         | 116/8 117/6 117/17           | 29/2 29/11 52/14           |
|                              | 93/22 109/3 111/1             | 102/23 120/18 144/18          | 120/2 128/16 133/18          | 59/17 59/17 87/15          |

|  |  |  |   |   |
|--|--|--|---|---|
| <b>M</b>   | 191/3 191/9 191/16<br>192/8 196/24   | 117/24 154/11 180/25<br>196/7  | 42/14 42/16 42/21<br>42/23 43/7 43/9 43/14<br>43/20 43/22 44/1<br>45/11 46/18 46/20<br>48/20 50/19 51/7 51/7<br>51/9 51/19 51/25 52/2<br>52/3 52/17 52/20 54/3<br>54/13 54/18 54/20<br>55/21 56/2 56/19<br>60/22 94/21 101/13<br>186/4  | 141/2 143/9 143/21<br>145/18 150/22 163/19<br>169/8 169/21 175/25<br>180/16 183/22 190/10<br>194/22 |
| <b>material...</b> [24] 88/7<br>88/18 95/4 95/5 95/5<br>97/13 99/3 99/4 99/25<br>100/22 101/25 102/13<br>102/14 102/15 110/6<br>110/10 127/15 133/2<br>133/3 147/15 173/22<br>183/7 183/16 183/18  | <b>mean</b> [19] 13/10 37/8<br>38/18 40/21 47/12<br>48/3 55/20 78/7<br>100/25 131/6 147/9<br>151/7 152/14 171/11<br>182/16 188/8 194/6<br>194/15 201/20  | <b>menu</b> [1] 133/2<br><b>merely</b> [2] 35/25<br>182/18<br><b>merged</b> [3] 12/5<br>33/14 117/15<br><b>merit</b> [3] 168/15<br>169/15 170/5<br><b>merits</b> [1] 167/17<br><b>message</b> [6] 16/1<br>80/6 139/24 149/9<br>149/24 198/11<br><b>messages</b> [1] 199/9<br><b>met</b> [4] 22/2 29/8<br>185/23 186/5<br><b>Mexico</b> [1] 131/21<br><b>MI</b> [1] 14/25<br><b>MICHAEL</b> [3] 1/8<br>1/14 204/2<br><b>mid</b> [4] 41/1 164/10<br>181/6 196/4<br><b>mid-2010</b> [2] 164/10<br>196/4<br><b>mid-2013</b> [1] 181/6<br><b>mid-August</b> [1] 41/1<br><b>might</b> [33] 2/22 38/8<br>44/22 49/19 59/19<br>62/6 76/18 79/19<br>80/25 81/18 82/2<br>83/14 85/22 95/15<br>95/17 96/11 112/25<br>119/17 130/22 131/4<br>137/15 143/4 150/9<br>159/21 161/6 161/10<br>161/14 163/4 163/5<br>171/24 172/22 177/4<br>184/9 | <b>morning</b> [16] 1/3<br>1/10 1/22 26/3 47/1<br>52/12 57/19 61/5<br>64/14 93/13 95/3 97/7<br>97/9 98/24 152/13<br>175/7<br><b>most</b> [10] 10/14<br>60/13 94/19 95/11<br>102/11 151/21 152/23<br>169/2 181/3 184/11<br><b>move</b> [16] 12/6 20/7<br>26/10 39/5 40/14 41/6<br>46/24 50/6 51/13 64/6<br>75/7 90/3 119/15<br>136/19 167/7 173/6<br><b>moved</b> [6] 11/19 12/7<br>12/15 17/7 20/9 132/9<br><b>moving</b> [3] 25/9 52/9<br>103/12<br><b>MPs</b> [1] 124/19<br><b>MR</b> [119] 1/9 1/10<br>1/21 1/22 2/3 2/11<br>3/12 3/15 3/16 11/19<br>12/15 12/15 13/22<br>17/7 22/18 26/16<br>27/12 27/13 27/14<br>27/15 27/20 27/24<br>28/4 28/10 28/14<br>29/17 30/6 30/11<br>30/20 32/7 37/20<br>38/11 38/12 39/2<br>39/11 39/15 40/1<br>40/11 40/18 40/18<br>40/20 40/21 42/4<br>42/12 42/13 45/11<br>45/13 47/7 47/16<br>47/18 50/25 54/2<br>54/10 55/9 55/9 56/25<br>57/5 58/12 64/18 69/6<br>71/22 72/6 78/25<br>79/16 87/11 90/10<br>90/11 119/22 119/25<br>120/14 126/25 127/22<br>129/14 133/11 135/22<br>135/25 136/15 136/21<br>137/13 139/20 139/24<br>140/5 140/23 143/3<br>145/18 146/2 147/22<br>149/9 149/24 152/24<br>155/16 155/17 158/4<br>158/18 159/12 159/13<br>159/13 160/7 160/9<br>160/16 162/21 163/15<br>163/20 164/6 167/15<br>168/20 169/13 171/5<br>173/13 179/15 180/2<br>195/1 195/7 196/19<br>201/7 201/25 202/22<br>203/7 204/4 |   |
| <b>materially</b> [1] 40/6<br><b>matter</b> [12] 18/4 18/9<br>18/11 19/22 63/14<br>125/24 168/11 168/23<br>177/15 200/13 200/17<br>200/22<br><b>matters</b> [3] 21/4<br>72/14 116/10<br><b>maximise</b> [1] 84/13<br><b>may</b> [79] 1/6 3/18<br>22/2 29/12 29/16 38/1<br>41/14 45/8 47/12<br>49/15 55/15 58/7<br>58/18 59/20 61/10<br>61/14 63/21 66/9<br>66/18 66/24 67/5<br>67/13 67/13 67/14<br>67/20 75/6 75/21<br>75/23 76/9 77/8 77/22<br>78/20 81/15 83/16<br>85/13 87/21 87/22<br>88/10 91/6 91/17<br>91/21 95/5 96/1 96/12<br>97/18 99/8 99/11<br>99/14 99/25 102/17<br>107/11 111/12 111/19<br>112/2 112/13 119/4<br>119/10 120/15 122/6<br>123/13 135/9 136/17<br>138/11 143/24 143/25<br>144/9 144/12 154/4<br>161/15 166/13 167/24<br>171/17 181/20 182/3<br>182/16 185/6 189/4<br>194/9 199/1<br><b>maybe</b> [2] 49/18<br>138/7<br><b>McLeod</b> [1] 190/24<br><b>MD</b> [1] 16/25<br><b>me</b> [55] 1/4 1/21 2/6<br>2/15 2/20 2/23 3/3 3/9<br>15/25 23/4 34/1 35/9<br>35/17 41/22 42/3 43/6<br>52/16 52/22 53/2 53/2<br>53/13 53/17 55/1<br>57/23 57/24 58/23<br>64/15 76/3 76/14<br>81/17 93/4 93/10<br>102/9 103/2 103/18<br>120/11 124/10 135/1<br>142/4 149/6 159/23<br>162/19 174/25 175/18<br>177/10 177/11 179/9<br>180/21 183/13 189/21 | <b>means</b> [7] 13/4 62/20<br>63/16 66/11 72/15<br>162/11 187/10<br><b>meant</b> [4] 8/10 63/24<br>79/8 177/20<br><b>measure</b> [2] 105/12<br>105/22<br><b>mechanism</b> [3] 77/13<br>141/1 141/6<br><b>mechanisms</b> [1]<br>187/13<br><b>media</b> [4] 156/23<br>165/11 166/8 170/15<br><b>meet</b> [8] 12/23 15/25<br>25/12 25/23 96/9<br>178/1 179/2 179/4<br><b>meeting</b> [53] 12/25<br>19/11 19/18 22/23<br>22/24 25/11 25/15<br>25/23 26/5 30/17<br>32/14 33/24 34/2 34/9<br>34/13 34/18 35/6 39/3<br>39/6 39/6 39/9 39/16<br>39/18 39/21 40/7<br>40/12 40/16 40/20<br>40/22 40/25 43/8<br>44/13 48/21 49/3<br>49/22 50/19 51/16<br>61/8 61/19 62/15 64/2<br>72/17 75/13 76/15<br>94/20 123/10 124/19<br>159/20 166/24 178/2<br>181/9 181/11 181/12<br><b>meetings</b> [10] 25/8<br>47/9 50/10 62/25<br>70/13 86/5 91/12<br>101/7 155/3 177/23<br><b>meetings/updates</b> [1]<br>155/3<br><b>meets</b> [2] 96/3 97/3<br><b>member</b> [5] 85/7<br>85/10 97/18 185/3<br>188/9<br><b>members</b> [8] 82/19<br>135/1 153/13 160/6<br>162/22 164/10 165/24<br>188/6<br><b>memo</b> [1] 155/20<br><b>memory</b> [1] 195/16<br><b>men</b> [1] 167/4<br><b>mended'</b> [1] 149/2<br><b>mention</b> [3] 7/4 30/17<br>161/6<br><b>mentioned</b> [8] 89/5<br>97/17 97/20 103/10 | <b>mindset</b> [2] 146/9<br>146/24<br><b>minute</b> [10] 26/5 26/7<br>34/11 51/17 51/18<br>55/13 55/16 98/14<br>98/18 159/8<br><b>minute-take</b> [1]<br>51/17<br><b>minute-taker</b> [2] 26/5<br>98/18<br><b>minute-takers</b> [2]<br>26/7 51/18<br><b>minuted</b> [2] 55/3 55/6<br><b>minutes</b> [43] 25/16<br>26/8 34/25 35/3 35/6<br>35/18 40/3 41/18   | <b>money</b> [4] 5/16<br>123/16 156/6 189/15<br><b>monitored</b> [1] 141/2<br><b>monitoring</b> [1] 113/9<br><b>month</b> [1] 202/11<br><b>monthly</b> [5] 178/2<br>181/9 185/5 185/24<br>186/2<br><b>months</b> [3] 6/7 13/1<br>18/1<br><b>mood</b> [1] 165/9<br><b>more</b> [45] 3/24 10/18<br>13/3 13/7 14/6 14/8<br>14/19 15/3 16/20<br>20/25 30/18 42/24<br>50/4 54/9 56/11 56/14<br>56/17 64/3 70/21<br>70/22 70/24 75/19<br>76/14 77/9 81/14 87/6<br>108/12 110/15 120/23<br>126/22 135/15 138/21  |   |

|          |  |  |   |   |
|----------|--|--|---|---|
| <b>M</b> | <b>Mr Wilson's [3]</b><br>155/16 160/7 160/9<br><b>Ms [6]</b> 89/16 122/24<br>195/5 196/19 202/21<br>204/6<br><b>Ms Ballan [1]</b> 122/24<br><b>Ms Crichton [1]</b><br>89/16<br><b>MS PAGE [3]</b> 195/5<br>202/21 204/6<br><b>Ms Talbot [1]</b> 196/19<br><b>MSC [4]</b> 5/12 7/3<br>7/17 7/19<br><b>MT [1]</b> 150/8<br><b>much [26]</b> 1/6 1/15<br>3/14 3/16 6/4 14/17<br>14/19 15/18 29/20<br>30/1 62/11 64/9 64/17<br>87/6 91/18 114/14<br>120/13 142/13 156/25<br>162/14 187/12 191/3<br>195/1 200/22 203/5<br>203/9<br><b>multi [1]</b> 117/18<br><b>multi-skilling [1]</b><br>117/18<br><b>multifaceted [1]</b><br>175/17<br><b>Murphy [2]</b> 118/11<br>149/16<br><b>must [23]</b> 2/22 3/9<br>19/2 19/6 27/18 29/6<br>47/6 57/22 57/24 67/1<br>73/14 82/1 95/18<br>109/3 109/5 111/1<br>111/3 111/15 111/16<br>113/18 122/20 159/2<br>197/10<br><b>mustn't [1]</b> 19/4<br><b>my [59]</b> 1/10 7/19<br>16/13 17/9 30/13 31/1<br>31/17 31/23 41/21<br>45/1 46/23 51/5 51/10<br>52/4 53/13 54/16<br>55/18 56/1 62/9 62/24<br>63/10 63/10 68/14<br>69/11 75/5 89/18<br>92/21 93/24 114/1<br>118/8 119/10 124/11<br>124/12 125/8 126/13<br>127/3 132/19 139/4<br>141/7 149/6 155/23<br>157/11 175/16 176/4<br>176/10 178/10 180/25<br>181/7 182/9 182/13<br>191/4 191/10 193/8<br>195/22 200/24 201/10<br>202/17 202/20 203/3<br><b>myriad [1]</b> 162/6<br><b>myself [2]</b> 35/9 73/8<br><b>myth [9]</b> 47/8 47/19<br>47/22 48/11 48/13<br>48/16 49/14 49/19<br>50/3 | <b>N</b><br><b>name [11]</b> 1/11 1/12<br>3/18 41/9 53/14 93/24<br>171/20 193/8 193/23<br>196/7 197/25<br><b>named [1]</b> 167/11<br><b>names [6]</b> 33/2 94/15<br>94/17 94/19 134/24<br>193/24<br><b>national [1]</b> 163/1<br><b>nature [6]</b> 14/14<br>45/14 56/23 141/3<br>150/23 158/1<br><b>nearly [1]</b> 31/9<br><b>necessarily [5]</b> 25/1<br>25/4 62/23 85/11<br>196/23<br><b>necessary [5]</b> 14/21<br>15/19 34/16 83/24<br>107/12<br><b>necessitated [1]</b><br>181/23<br><b>necessity [1]</b> 174/5<br><b>need [37]</b> 4/6 4/22<br>24/1 24/19 24/25<br>28/24 37/3 37/17 38/7<br>39/1 46/19 47/20<br>56/17 110/5 116/5<br>128/2 137/18 138/21<br>139/1 139/10 140/6<br>140/14 140/23 142/13<br>144/23 156/7 157/21<br>158/20 161/16 164/23<br>168/3 171/7 173/3<br>179/14 196/10 196/16<br>197/7<br><b>needed [9]</b> 18/9<br>19/25 56/14 114/20<br>143/10 148/15 153/4<br>155/20 182/2<br><b>needn't [1]</b> 122/16<br><b>needs [2]</b> 34/21<br>37/10<br><b>Negroid [1]</b> 116/17<br><b>neither [3]</b> 31/11<br>87/22 160/21<br><b>network [2]</b> 10/13<br>81/7<br><b>neutral [1]</b> 146/16<br><b>Never [1]</b> 127/17<br><b>new [6]</b> 19/24 34/6<br>156/3 161/22 174/11<br>182/15<br><b>news [2]</b> 165/4 166/4<br><b>newspaper [1]</b><br>124/16<br><b>newsworthy [1]</b><br>165/12<br><b>next [17]</b> 32/5 39/6<br>46/24 50/6 62/9 78/2<br>79/9 93/3 93/18<br>120/14 122/14 141/16<br>142/12 150/5 159/8 | 165/5 197/18<br><b>nicely [1]</b> 124/20<br><b>night [1]</b> 78/11<br><b>nine [4]</b> 103/4 105/10<br>113/17 115/3<br><b>nine years [4]</b> 103/4<br>105/10 113/17 115/3<br><b>ninth [1]</b> 4/13<br><b>no [198]</b> 3/5 4/6 4/22<br>6/23 7/7 9/4 9/8 9/12<br>9/18 9/23 10/1 10/3<br>11/13 11/23 12/9<br>14/13 16/7 16/11 17/9<br>18/14 18/15 18/18<br>18/20 19/18 20/6<br>20/15 22/23 24/9<br>24/13 29/5 30/4 33/10<br>34/25 35/3 35/6 38/24<br>40/3 40/23 43/4 46/14<br>48/15 48/17 51/2 53/1<br>53/6 56/1 56/6 56/9<br>57/1 58/17 58/20 59/6<br>59/18 59/22 59/23<br>60/22 61/2 62/22<br>63/17 63/22 67/22<br>67/25 68/12 69/21<br>70/13 72/3 72/12<br>72/16 72/24 73/2<br>74/23 75/3 76/7 78/15<br>78/22 79/11 79/22<br>80/8 82/15 86/8 87/20<br>87/20 87/20 88/20<br>89/14 89/18 89/23<br>90/1 91/11 92/15<br>92/19 92/25 93/1 93/5<br>93/11 93/14 93/16<br>100/4 102/23 103/18<br>104/22 104/22 104/25<br>109/7 111/5 112/8<br>113/5 113/23 114/24<br>115/8 115/20 115/23<br>116/1 116/12 116/14<br>116/19 116/22 118/24<br>123/15 124/13 125/16<br>126/4 127/21 127/21<br>130/23 131/11 133/1<br>133/6 133/9 134/25<br>135/9 136/14 138/3<br>138/3 140/18 140/21<br>140/25 141/4 141/10<br>141/13 141/15 141/17<br>141/20 142/16 145/2<br>145/23 146/4 146/7<br>146/14 147/2 147/23<br>148/13 148/21 149/3<br>149/15 151/2 151/6<br>154/9 154/17 157/5<br>160/25 164/5 166/5<br>166/18 166/23 168/10<br>168/23 170/10 170/23<br>171/3 172/7 173/8<br>173/24 174/10 176/20<br>177/6 177/9 177/20<br>177/23 179/2 179/14 | 179/18 180/7 185/24<br>186/1 187/12 191/14<br>193/17 193/18 194/9<br>196/6 197/10 198/2<br>199/5 199/11 200/16<br>201/2 201/5<br><b>nodded [6]</b> 73/20<br>100/12 102/3 102/5<br>148/20 169/25<br><b>nodding [2]</b> 152/9<br>152/12<br><b>non [3]</b> 15/5 69/5<br>152/11<br><b>non-compliance [1]</b><br>15/5<br><b>Non-verbal [1]</b> 69/5<br><b>none [3]</b> 19/25 29/22<br>159/16<br><b>nor [2]</b> 10/2 31/12<br><b>Norbury [1]</b> 121/3<br><b>normal [1]</b> 133/15<br><b>Northern [1]</b> 179/8<br><b>not [224]</b><br><b>not' [1]</b> 55/7<br><b>note [18]</b> 22/23 32/16<br>36/22 41/8 42/5 57/18<br>57/25 58/9 68/15 70/5<br>71/6 78/4 78/24 82/15<br>82/24 83/2 85/9<br>150/20<br><b>notes [55]</b> 35/1 35/4<br>36/7 36/7 36/12 36/14<br>40/4 43/11 43/24 44/9<br>44/24 45/2 45/4 45/20<br>45/25 46/7 46/10 52/7<br>54/18 56/2 59/25<br>67/22 67/23 67/24<br>67/24 67/25 68/3 68/6<br>68/21 68/23 68/23<br>68/25 68/25 69/22<br>69/25 70/3 70/16<br>71/10 71/15 72/4 73/2<br>75/14 75/17 76/16<br>81/9 83/22 88/20<br>88/22 90/16 90/18<br>91/9 91/13 94/4 94/4<br>191/4<br><b>nothing [8]</b> 22/4<br>37/13 56/23 63/7<br>96/15 146/13 199/6<br>201/22<br><b>notice [1]</b> 82/23<br><b>noting [1]</b> 116/4<br><b>notwithstanding [2]</b><br>28/9 28/23<br><b>now [30]</b> 17/21 22/10<br>28/19 28/23 31/19<br>32/14 32/20 33/22<br>61/24 63/6 65/10 75/9<br>75/17 76/14 84/4<br>85/13 89/18 106/4<br>127/20 153/18 154/24<br>157/25 159/20 160/19<br>163/14 165/6 171/23 |
|----------|--|--|---|---|

|   |   |   |   |  |
|---|---|---|---|--|
| <b>N</b>  | <b>offender [21]</b> 102/10<br>103/9 104/6 106/15<br>106/23 107/19 108/2<br>108/4 108/8 108/12<br>108/19 108/23 109/12<br>111/8 111/16 111/19<br>112/10 112/18 114/7<br>183/15 183/19   | 21/3 21/9 21/24 54/1<br>117/8 118/8 120/4<br>121/5 121/20 122/16<br>126/11 126/15 126/23<br>180/19  | <b>operating [4]</b> 75/16<br>76/16 157/2 177/5   | <b>ought [4]</b> 23/15 29/1<br>29/6 59/2   |
| <b>now... [3]</b> 181/5<br>181/17 188/5   | <b>offenders [2]</b> 115/10<br>157/8  | <b>old [1]</b> 148/1  | <b>our [37]</b> 2/9 13/15<br>15/1 15/8 60/17 83/20<br>85/23 96/9 96/13<br>96/25 120/14 125/2<br>128/21 129/9 137/6<br>138/22 144/5 144/20<br>145/8 146/18 150/3<br>155/4 155/5 156/6<br>156/7 157/3 157/5<br>167/3 167/3 168/8<br>168/18 168/22 173/4<br>179/8 198/8 198/15<br>199/2  |  |
| <b>number [25]</b> 28/19<br>29/4 31/1 31/5 32/1<br>52/18 53/11 53/12<br>60/4 80/17 117/7<br>117/8 117/21 123/19<br>141/3 148/17 148/19<br>149/9 155/10 158/19<br>160/17 164/22 179/11<br>193/5 198/22 | <b>offensive [1]</b> 114/14   | <b>on [261]</b>   | <b>out [42]</b> 15/16 20/21<br>20/23 29/20 31/10<br>34/23 78/12 81/14<br>84/12 97/13 97/21<br>98/1 98/25 107/16<br>112/10 112/25 113/6<br>115/5 122/15 125/1<br>125/24 128/15 128/20<br>129/4 135/22 138/8<br>139/4 146/11 151/23<br>154/21 155/15 155/19<br>156/15 170/12 176/12<br>178/20 178/21 195/17<br>195/22 196/4 197/4<br>197/11 |  |
| <b>numerous [1]</b> 168/17  | <b>offer [1]</b> 157/5  | <b>once [12]</b> 11/4 11/5<br>12/17 22/2 30/19<br>44/22 44/24 87/6<br>130/8 136/7 151/17<br>179/8   | <b>outcome [2]</b> 156/20<br>200/14   |  |
| <b>O</b>  | <b>offered [1]</b> 15/17  | <b>one [62]</b> 11/1 11/4<br>15/19 17/20 19/11<br>19/15 23/13 23/18<br>24/24 32/6 34/7 37/17<br>42/5 43/18 55/8 62/6<br>63/10 68/11 71/24<br>75/8 93/17 95/10<br>100/4 106/7 107/18<br>110/11 114/5 116/5<br>118/17 119/4 119/4<br>122/11 130/21 133/21<br>136/11 137/21 147/16<br>152/3 155/13 159/5<br>161/7 165/15 168/25<br>171/6 175/5 177/23<br>178/1 180/23 187/2<br>188/6 191/3 191/5<br>191/21 191/22 192/14<br>193/23 195/2 197/12<br>197/18 197/19 199/23<br>200/6 | <b>ops [1]</b> 117/17   | <b>outlet [2]</b> 198/19<br>199/22   |
| <b>oath [1]</b> 173/18  | <b>office [106]</b> 4/25 7/19<br>7/22 8/17 10/6 13/7<br>13/14 13/19 14/16<br>15/11 18/9 18/13 20/3<br>20/14 20/25 22/7<br>22/19 23/7 23/8 23/8<br>23/11 24/2 25/10<br>26/17 26/21 26/22<br>28/12 28/13 28/16<br>28/25 32/9 47/4 47/24<br>48/2 48/3 48/4 48/7<br>49/16 50/4 54/4 55/1<br>55/13 55/15 58/2<br>58/12 74/6 74/21<br>74/24 80/15 80/23<br>82/1 84/3 87/14 92/10<br>95/13 96/7 97/8 97/15<br>98/8 106/11 107/22<br>108/14 110/19 111/24<br>116/7 118/7 121/2<br>123/7 124/12 125/10<br>128/25 132/21 132/24<br>133/17 134/10 137/4<br>139/7 141/1 145/22<br>146/10 149/10 153/15<br>156/25 157/1 158/24<br>161/2 162/22 165/10<br>166/1 167/16 168/10<br>169/6 169/11 171/10<br>184/17 184/24 189/11<br>189/17 190/6 191/2<br>192/20 193/12 193/21<br>194/19 195/25 196/7 | <b>ones [4]</b> 71/18 116/7<br>177/23 178/1   | <b>option [2]</b> 143/4<br>187/2  | <b>outlier [1]</b> 15/11   |
| <b>object [1]</b> 57/8  | <b>Office's [11]</b> 17/15<br>25/19 50/22 66/16<br>71/13 81/1 82/13<br>83/15 139/22 144/25<br>175/12  | <b>ongoing [4]</b> 28/3<br>91/23 143/13 157/9   | <b>or [222]</b>   | <b>outliers [2]</b> 15/8<br>15/14  |
| <b>objection [3]</b> 2/24 3/1<br>123/10   | <b>Office/Fujitsu [1]</b><br>128/25   | <b>Online [7]</b> 95/20<br>96/12 96/21 96/22<br>99/8 102/14 148/2   | <b>oral [2]</b> 152/10<br>202/25  | <b>outline [1]</b> 137/20  |
| <b>objective [2]</b> 173/12<br>173/21   | <b>officer [9]</b> 5/20 6/5<br>7/5 7/14 7/15 7/18 8/7<br>8/12 65/25   | <b>only [38]</b> 16/16 19/11<br>22/12 30/3 46/16<br>55/18 61/24 65/8<br>66/13 68/14 69/10<br>71/15 73/14 77/1 87/3<br>107/13 110/18 111/25<br>113/18 129/7 146/12<br>151/11 152/5 155/20<br>156/5 157/3 168/2<br>168/14 169/15 170/5<br>173/19 180/14 190/2<br>190/12 196/6 197/19<br>201/20 201/23   | <b>order [8]</b> 19/2 36/10<br>84/13 88/9 88/18<br>101/13 189/7 194/10  | <b>outlined [2]</b> 34/13<br>155/6   |
| <b>objectively [1]</b><br>159/25  | <b>offices [3]</b> 10/13<br>15/12 187/20  | <b>onto [1]</b> 10/13   | <b>orders [3]</b> 36/1 36/3<br>79/13  | <b>outlines [1]</b> 91/25  |
| <b>obligation [1]</b> 81/5  | <b>official [2]</b> 115/11<br>115/13  | <b>onwards [4]</b> 11/14<br>17/4 17/24 22/15  | <b>Orford [1]</b> 143/14  | <b>outset [7]</b> 15/4 69/19<br>71/20 71/25 72/1<br>105/6 163/1  |
| <b>obligations [8]</b> 70/9<br>70/20 76/5 81/22 83/9<br>88/10 88/19 110/9   | <b>often [2]</b> 12/23<br>148/23  | <b>open [7]</b> 129/9<br>146/16 147/3 147/9<br>147/18 148/13 157/15   | <b>Orfod [1]</b> 143/14   | <b>outside [4]</b> 87/7<br>152/7 152/18 171/16   |
| <b>88/10 88/19 110/9</b>  | <b>Oh [1]</b> 115/20  | <b>opening [1]</b> 40/20  | <b>organisation [5]</b><br>17/16 56/17 96/20<br>152/7 152/19  | <b>outstanding [2]</b><br>121/4 128/12   |
| <b>observations [1]</b><br>101/10   | <b>okay [16]</b> 4/16 8/5   | <b>openness [1]</b> 130/21  | <b>organisations [2]</b> 5/1<br>84/10   | <b>over [39]</b> 11/17 12/8<br>12/9 12/17 14/15 16/2<br>17/23 38/2 41/2 75/17<br>80/14 84/2 93/10 97/6<br>98/21 98/22 101/9<br>105/7 106/20 108/9<br>108/18 122/8 128/6<br>129/8 136/10 145/16<br>160/4 170/10 171/4<br>171/13 174/22 175/9<br>175/15 181/15 181/19<br>181/23 189/21 190/22<br>197/4 |
| <b>obtain [4]</b> 84/16<br>130/4 168/11 168/24  |   | <b>operate [1]</b> 6/10   | <b>organise [1]</b> 176/9   | <b>overall [5]</b> 13/13<br>105/22 129/14 176/24<br>177/9  |
| <b>obtaining [2]</b> 133/3<br>135/8   |   | <b>operated [2]</b> 149/2<br>175/25   | <b>organised [2]</b> 56/11<br>56/15   |  |
| <b>obvious [2]</b> 138/22<br>199/5  |   |   | <b>origin [1]</b> 116/13  |  |
| <b>obviously [17]</b> 16/20<br>31/23 53/13 77/8<br>77/22 86/23 103/2<br>111/18 137/6 160/12<br>182/20 183/16 190/7<br>196/3 196/6 197/4<br>197/10   |   |   | <b>originally [2]</b> 33/13<br>54/10  |  |
| <b>occasion [1]</b> 102/19  |   |   | <b>other [28]</b> 5/14 15/10<br>42/9 46/9 53/18 81/18<br>83/3 84/10 85/15<br>116/9 138/22 140/7<br>143/20 161/6 161/8<br>163/25 175/17 183/16<br>187/13 188/7 188/7<br>188/8 193/5 195/12<br>196/14 197/19 199/10<br>200/20   |  |
| <b>occasions [2]</b> 38/2<br>102/17   |   |   | <b>others [15]</b> 70/21<br>75/6 89/9 93/4 98/8<br>121/2 149/13 167/20<br>168/4 168/19 168/22<br>171/9 173/1 179/20<br>198/6  |  |
| <b>Occupying [1]</b> 140/4  |   |   | <b>otherwise [6]</b> 12/24<br>33/6 75/12 99/12<br>99/14 189/4   |  |
| <b>occur [2]</b> 86/15<br>133/16  |   |   |   |  |
| <b>occurred [2]</b> 107/11<br>128/7   |   |   |   |  |
| <b>October [4]</b> 1/1 93/19<br>93/21 141/5   |   |   |   |  |
| <b>October 2013 [1]</b><br>141/5  |   |   |   |  |
| <b>off [20]</b> 39/16 41/19<br>58/4 58/14 95/7<br>117/14 124/6 128/24<br>140/6 140/8 140/15<br>154/19 171/21 182/14<br>182/16 182/17 183/3<br>184/4 192/12 193/19                                     |   |   |   |  |
| <b>offences [3]</b> 6/22<br>22/22 23/10   |   |   |   |  |

|   |   |  |  |   |
|---|---|--|--|---|
| <p><b>O</b></p> <p><b>overarching [2]</b><br/>192/14 193/20</p> <p><b>overriding [1]</b> 161/2</p> <p><b>oversee [1]</b> 175/19</p> <p><b>overseeing [1]</b><br/>176/13</p> <p><b>oversight [8]</b> 13/13<br/>13/17 135/5 153/11<br/>176/19 177/16 177/21<br/>184/23</p> <p><b>own [17]</b> 4/9 26/7<br/>33/12 33/16 43/10<br/>43/24 44/9 46/10<br/>51/19 58/4 58/14<br/>83/20 137/6 171/10<br/>192/25 193/21 197/12</p> <p><b>owned [1]</b> 194/4</p> <p><b>owner [5]</b> 191/16<br/>192/2 193/6 193/13<br/>194/21</p> | <p>182/7</p> <p><b>page 2 [4]</b> 5/8 80/5<br/>106/20 144/2</p> <p><b>page 213 [1]</b> 13/23</p> <p><b>page 214 [1]</b> 13/24</p> <p><b>page 26 [1]</b> 191/7</p> <p><b>page 3 [3]</b> 141/22<br/>141/23 149/5</p> <p><b>page 4 [2]</b> 126/15<br/>131/19</p> <p><b>page 47 [1]</b> 3/20</p> <p><b>page 5 [4]</b> 87/13<br/>124/7 124/8 129/22</p> <p><b>page 6 [3]</b> 126/25<br/>176/2 182/6</p> <p><b>page 7 [2]</b> 123/2<br/>174/15</p> <p><b>page 73 [1]</b> 191/6</p> <p><b>page 8 [2]</b> 120/20<br/>186/16</p> <p><b>page 9 [2]</b> 108/22<br/>175/9</p> <p><b>pages [4]</b> 7/8 101/9<br/>147/4 147/7</p> <p><b>pair [2]</b> 14/11 137/13</p> <p><b>palpably [1]</b> 170/8</p> <p><b>paper [5]</b> 87/4 88/23<br/>88/24 172/12 173/11</p> <p><b>papers [6]</b> 149/7<br/>181/7 183/9 183/10<br/>183/13 183/14</p> <p><b>paragraph [36]</b> 5/10<br/>25/9 25/20 26/1 26/16<br/>27/9 38/13 40/1 51/13<br/>52/9 61/17 62/11<br/>62/24 64/20 69/11<br/>69/14 75/7 75/8 76/12<br/>87/13 107/17 108/7<br/>110/16 110/23 140/22<br/>151/14 165/7 174/15<br/>174/22 176/3 178/5<br/>178/9 179/15 180/9<br/>191/8 195/15</p> <p><b>paragraph 18 [2]</b><br/>176/3 178/9</p> <p><b>paragraph 2 [2]</b><br/>108/7 110/16</p> <p><b>paragraph 2.15 [1]</b><br/>110/23</p> <p><b>Paragraph 20 [1]</b><br/>174/15</p> <p><b>paragraph 23 [1]</b><br/>174/22</p> <p><b>paragraph 3 [2]</b> 25/9<br/>151/14</p> <p><b>paragraph 38 [1]</b><br/>27/9</p> <p><b>paragraph 4 [2]</b> 26/1<br/>51/13</p> <p><b>paragraph 43 [1]</b><br/>178/5</p> <p><b>paragraph 5 [3]</b> 5/10<br/>52/9 75/7</p> <p><b>paragraph 73 [1]</b></p> | <p>191/8</p> <p><b>paragraph 9 [1]</b><br/>87/13</p> <p><b>paragraphs [11]</b> 23/6<br/>50/11 63/10 76/20<br/>96/16 107/12 113/19<br/>122/14 174/13 174/16<br/>175/22</p> <p><b>paragraphs 1 [1]</b><br/>23/6</p> <p><b>paragraphs 20 [2]</b><br/>174/13 174/16</p> <p><b>Pardoe [3]</b> 118/9<br/>164/3 185/14</p> <p><b>parent [1]</b> 192/13</p> <p><b>Parsons [9]</b> 37/21<br/>37/21 38/11 38/12<br/>39/2 49/2 49/21 49/25<br/>90/6</p> <p><b>part [30]</b> 6/6 25/20<br/>36/6 36/10 36/22<br/>38/13 60/13 60/17<br/>66/20 67/18 69/24<br/>85/18 86/1 86/2 86/7<br/>88/12 89/12 107/16<br/>108/22 113/2 113/6<br/>114/10 132/7 132/18<br/>139/7 144/8 158/3<br/>176/22 185/15 195/25</p> <p><b>participants [3]</b><br/>25/13 50/17 60/21</p> <p><b>particular [15]</b> 47/17<br/>85/18 86/12 104/2<br/>118/18 122/16 124/2<br/>148/6 186/7 197/12<br/>199/1 199/14 199/22<br/>200/6 202/10</p> <p><b>particularly [7]</b> 30/22<br/>37/25 42/23 124/22<br/>137/11 197/3 198/1</p> <p><b>parties [1]</b> 84/9</p> <p><b>partly [2]</b> 88/9 88/14</p> <p><b>partner [1]</b> 151/22</p> <p><b>parts [2]</b> 101/25<br/>114/15</p> <p><b>party [5]</b> 87/21 169/1<br/>169/5 169/9 169/11</p> <p><b>pass [1]</b> 72/7</p> <p><b>passed [7]</b> 36/10<br/>43/21 46/12 54/10<br/>56/23 102/20 179/25</p> <p><b>passing [4]</b> 30/17<br/>40/11 43/12 45/6</p> <p><b>past [9]</b> 10/23 27/2<br/>30/9 101/12 150/17<br/>150/21 150/25 162/5<br/>171/14</p> <p><b>Paula [1]</b> 185/13</p> <p><b>paused [2]</b> 9/25 10/2</p> <p><b>PC [1]</b> 128/16</p> <p><b>pdf [1]</b> 144/6</p> <p><b>Peacock [1]</b> 93/25</p> <p><b>pending [1]</b> 156/19</p> <p><b>people [32]</b> 46/9</p> | <p>48/16 53/11 53/18<br/>53/22 58/24 65/20<br/>80/9 105/4 110/5<br/>116/16 116/18 124/21<br/>125/12 125/13 130/24<br/>133/2 134/20 147/16<br/>147/18 149/10 155/10<br/>159/7 161/9 161/15<br/>162/4 163/21 165/19<br/>165/24 168/11 169/3<br/>194/3</p> <p><b>per [5]</b> 46/23 104/17<br/>104/18 186/21 188/19</p> <p><b>percentage [1]</b><br/>104/15</p> <p><b>perception [1]</b><br/>171/10</p> <p><b>percolating [1]</b> 47/22</p> <p><b>perform [3]</b> 10/7<br/>134/11 135/3</p> <p><b>performance [2]</b><br/>13/16 179/5</p> <p><b>performed [1]</b> 33/5</p> <p><b>performing [1]</b> 9/15</p> <p><b>perhaps [2]</b> 25/2<br/>37/2</p> <p><b>period [15]</b> 7/19 9/2<br/>9/5 11/8 18/25 21/1<br/>22/9 53/1 80/1 118/2<br/>118/7 128/7 132/23<br/>190/22 190/25</p> <p><b>periods [1]</b> 17/20</p> <p><b>permanent [1]</b><br/>134/22</p> <p><b>permitted [3]</b> 46/11<br/>46/14 89/11</p> <p><b>persist [1]</b> 48/18</p> <p><b>persistent [1]</b> 156/1</p> <p><b>person [15]</b> 33/1<br/>33/3 42/5 42/9 70/19<br/>92/15 97/20 104/16<br/>104/18 110/1 185/14<br/>193/13 193/14 193/15<br/>194/5</p> <p><b>personal [3]</b> 93/7<br/>174/25 180/1</p> <p><b>personality [1]</b> 14/11</p> <p><b>Personnel [1]</b> 110/20</p> <p><b>persons [3]</b> 52/19<br/>96/23 98/23</p> <p><b>perspective [3]</b><br/>167/18 184/24 201/11</p> <p><b>pertinent [1]</b> 143/6</p> <p><b>pervert [1]</b> 88/11</p> <p><b>Peter [1]</b> 185/12</p> <p><b>petty [1]</b> 118/20</p> <p><b>phone [2]</b> 15/17<br/>89/17</p> <p><b>physical [4]</b> 10/5<br/>117/16 174/20 174/23</p> <p><b>pick [2]</b> 48/25 188/11</p> <p><b>picked [1]</b> 86/23</p> <p><b>picture [2]</b> 147/13<br/>148/22</p> | <p><b>piece [1]</b> 150/6</p> <p><b>pieces [4]</b> 87/4 88/23<br/>88/24 188/11</p> <p><b>pinning [1]</b> 139/13</p> <p><b>place [15]</b> 52/12 63/8<br/>91/3 91/14 93/9 95/23<br/>100/3 100/13 100/20<br/>110/11 133/20 143/25<br/>158/2 165/16 165/21</p> <p><b>placed [1]</b> 96/18</p> <p><b>placing [2]</b> 28/16<br/>90/23</p> <p><b>plain [2]</b> 27/22 57/24</p> <p><b>plan [3]</b> 151/23 152/3<br/>160/5</p> <p><b>planned [1]</b> 186/19</p> <p><b>plans [1]</b> 160/23</p> <p><b>platforms [1]</b> 168/17</p> <p><b>please [115]</b> 1/13<br/>3/14 4/22 5/7 10/11<br/>23/2 26/10 26/11<br/>26/12 26/15 27/9<br/>32/15 34/11 36/16<br/>38/10 39/5 40/14 41/6<br/>46/24 48/9 50/6 50/13<br/>55/12 57/3 57/3 57/7<br/>57/19 59/13 60/2 60/7<br/>61/3 62/13 71/24 75/7<br/>78/2 80/5 81/10 82/15<br/>82/19 85/9 87/13 90/3<br/>90/8 90/9 90/10 93/19<br/>94/15 94/18 94/22<br/>98/12 98/22 101/3<br/>103/20 106/8 106/20<br/>107/15 107/25 108/5<br/>108/11 108/22 110/13<br/>110/14 114/4 120/5<br/>120/14 120/17 120/21<br/>120/22 120/25 122/18<br/>122/25 123/2 124/5<br/>126/24 129/22 131/19<br/>134/1 134/6 135/25<br/>136/5 141/21 141/22<br/>142/20 143/5 144/2<br/>144/14 145/17 145/17<br/>149/4 149/5 149/8<br/>152/15 154/18 154/21<br/>155/9 155/14 162/12<br/>163/13 163/19 167/13<br/>171/4 173/9 173/10<br/>174/11 174/14 175/9<br/>176/2 182/7 185/8<br/>186/16 186/17 188/1<br/>188/13 191/5 192/4</p> <p><b>pleased [1]</b> 186/22</p> <p><b>plus [2]</b> 138/23<br/>183/19</p> <p><b>pm [7]</b> 41/15 42/12<br/>120/7 120/9 162/15<br/>162/17 203/10</p> <p><b>point [25]</b> 2/24 14/5<br/>23/23 38/1 44/7 49/5<br/>49/8 52/10 61/9 62/16<br/>63/14 69/21 72/3</p> |
|---|---|--|--|---|

|  |                               |                                       |   |   |
|--|-------------------------------|---------------------------------------|---|---|
| <b>P</b>                               | 41/7                          | 66/15 71/12 74/6                      | <b>preservation [1]</b> 81/25                 | 84/5 84/21 85/25                              |
| <b>point...</b> [12] 108/14            | <b>POL00139746 [1]</b> 46/25  | 74/21 74/24 80/15                     | <b>preserve [1]</b> 82/2                      | <b>pro [1]</b> 114/6                          |
| 119/11 132/2 147/16                    | <b>POL00139747 [1]</b> 57/3   | 80/23 81/1 82/1 82/13                 | <b>preserved [1]</b> 82/17                    | <b>proactively [1]</b> 34/23                  |
| 163/3 166/25 167/3                     | <b>POL00139748 [1]</b> 78/23  | 83/15 84/3 87/14                      | <b>presided [1]</b> 17/23                     | <b>probably [11]</b> 11/1                     |
| 168/16 180/23 181/3                    | <b>POL00139749 [1]</b> 78/4   | 92/10 95/13 96/7 97/8                 | <b>press [5]</b> 123/25                       | 30/18 53/18 62/8                              |
| 190/11 196/17                          | <b>police [19]</b> 5/20 5/23  | 97/15 98/8 106/11                     | 156/23 168/10 169/6                           | 102/10 117/13 119/22                          |
| <b>points [5]</b> 61/18                | 6/11 7/5 7/13 7/15            | 108/5 108/9 108/14                    | 169/10  | 125/12 138/11 165/1                           |
| 101/7 129/19 143/9                     | 7/18 8/7 8/12 65/25           | 110/18 111/24 116/7                   | <b>presumably [3]</b> 117/8 151/7 172/8       | 173/15  |
| 164/23                                 | 115/12 115/13 115/16          | 121/2 123/7 124/12                    | <b>presume [5]</b> 41/15                      | <b>problem [3]</b> 65/3                       |
| <b>POL [6]</b> 130/9 131/17            | 115/19 115/22 115/25          | 125/10 128/25 132/21                  | 51/24 66/13 143/18                            | 161/14 166/11                                 |
| 156/22 175/4 191/19                    | 116/3 116/5 116/10            | 132/24 134/10 137/4                   | 200/1   | <b>problematic [1]</b> 201/7                  |
| 198/24                                 | <b>policies [9]</b> 82/25     | 139/22 141/1 144/25                   | <b>presumption [1]</b> 150/14                 | <b>problems [6]</b> 35/1                      |
| <b>POL00006357 [1]</b> 26/11           | 135/4 178/17 191/10           | 145/22 146/9 149/10                   | <b>pretty [1]</b> 200/22                      | 40/4 59/1 65/14 122/8                         |
| <b>POL00006799 [3]</b> 23/3 50/7 87/12 | 191/12 191/14 191/17          | 153/15 156/25 158/24                  | <b>prevailing [5]</b> 113/3                   | 158/5   |
| <b>POL00021422 [1]</b> 185/9           | 193/5 194/4                   | 161/2 162/22 165/10                   | 130/15 130/20 165/9                           | <b>procedural [1]</b> 145/14                  |
| <b>POL00029475 [1]</b> 167/8           | <b>policy [16]</b> 18/3       | 166/1 167/16 171/10                   | 173/6   | <b>procedure [1]</b> 132/16                   |
| <b>POL00030580 [2]</b> 191/17 191/23   | 111/25 191/23 192/2           | 175/12 184/17 184/24                  | <b>prevent [2]</b> 14/20                      | <b>procedures [6]</b> 82/14                   |
| <b>POL00031322 [1]</b> 188/1           | 192/5 192/14 192/24           | 189/11 190/6 191/2                    | 154/15  | 109/2 109/5 109/8                             |
| <b>POL00054371 [1]</b> 141/22          | 193/10 193/14 193/15          | 191/19 192/20 193/12                  | <b>preventative [10]</b> 5/13 7/21 8/25 14/19 | 110/25 111/2                                  |
| <b>POL00083930 [1]</b> 89/4            | 193/16 193/20 193/21          | 193/20 194/19 196/7                   | 15/4 15/15 117/16                             | <b>proceed [4]</b> 83/17                      |
| <b>POL00083932 [1]</b> 32/15           | 194/1 194/10 194/19           | <b>post-interview [2]</b> 108/5 108/9 | 187/12 187/15 187/18                          | 155/22 157/18 178/19                          |
| <b>POL00083933 [1]</b> 39/7            | <b>position [7]</b> 17/16     | <b>postmasters [2]</b> 121/9 167/3    | <b>prevention [4]</b> 17/3                    | <b>proceeding [1]</b> 156/13                  |
| <b>POL00083935 [1]</b> 92/7            | 27/19 53/7 81/12 96/8         | <b>potential [5]</b> 19/12            | 113/6 113/10 175/5                            | <b>proceedings [17]</b> 21/3 70/10 80/22 84/4 |
| <b>POL00095547 [1]</b> 180/6           | 139/22 140/4                  | 19/13 73/4 136/17                     | <b>previous [5]</b> 52/17                     | 100/9 103/15 112/3                            |
| <b>POL00106867 [1]</b> 149/4           | <b>positive [1]</b> 95/14     | 156/24                                | 52/24 75/11 75/16                             | 112/14 155/23 156/19                          |
| <b>POL00107696 [1]</b> 80/4            | <b>positively [1]</b> 110/5   | <b>potentially [11]</b> 37/4          | 149/23  | 171/18 172/23 174/6                           |
| <b>POL00118101 [1]</b> 106/10          | <b>Posnett [20]</b> 32/23     | 70/6 70/8 82/3 83/14                  | <b>previously [3]</b> 1/16                    | 174/8 182/23 187/10                           |
| <b>POL00118152 [1]</b> 114/4           | 37/20 40/18 40/20             | 85/23 111/21 112/15                   | 73/5 148/22                                   | 189/16  |
| <b>POL00119858 [2]</b> 136/19 195/14   | 40/21 51/24 52/6 90/6         | 152/7 180/4 194/2                     | <b>price [1]</b> 138/15                       | <b>Proceeds [2]</b> 188/23                    |
| <b>POL00119917 [1]</b> 103/20          | 135/15 135/18 135/22          | <b>power [2]</b> 53/8 53/24           | <b>primary [3]</b> 8/23                       | 188/24  |
| <b>POL00120479 [1]</b> 163/13          | 135/25 136/15 137/16          | <b>practicable [1]</b> 83/23          | 23/16 97/11                                   | <b>process [12]</b> 34/21                     |
| <b>POL00139690 [2]</b> 60/3 64/19      | 143/4 154/19 154/22           | <b>practice [8]</b> 51/1              | <b>principle [10]</b> 2/9                     | 42/24 42/25 44/23                             |
| <b>POL00139691 [1]</b> 90/4            | 155/15 155/17 159/12          | 87/24 88/4 88/8                       | 2/13 44/18 45/8 71/8                          | 90/18 99/22 105/11                            |
| <b>POL00139695 [1]</b> 93/20           | <b>Posnett-King [1]</b> 52/6  | 100/24 100/25 101/1                   | 107/9 123/9 149/1                             | 115/24 128/23 156/18                          |
| <b>POL00139696 [1]</b> 94/23           | <b>possibilities [1]</b> 24/8 | 193/12                                | 194/14 194/15                                 | 169/6 169/10                                  |
| <b>POL00139726 [1]</b> 92/6            | <b>possibility [5]</b> 80/21  | <b>pre [1]</b> 145/8                  | <b>principles [3]</b> 94/11                   | <b>processes [4]</b> 83/21                    |
| <b>POL00139732 [1]</b> 40/15           | 84/5 130/21 147/10            | <b>pre-existing [1]</b> 145/8         | 139/12 196/13                                 | 129/17 178/13 178/24                          |
| <b>POL00139745 [1]</b>                 | 150/1                         | <b>preamble [4]</b> 95/8              | <b>printed [1]</b> 108/16                     | <b>produced [22]</b> 4/8                      |
|  | <b>possible [13]</b> 47/12    | 107/21 108/2 108/13                   | <b>prior [3]</b> 22/13                        | 9/21 11/12 20/13 37/4                         |
|  | 62/11 73/9 73/11              | <b>preamble/s [1]</b> 107/21          | 191/18 198/11                                 | 37/10 37/16 38/15                             |
|  | 73/13 74/15 74/19             | <b>precedent [1]</b> 123/14           | 165/10 166/2 166/11                           | 47/10 55/5 65/1 65/4                          |
|  | 75/2 75/4 84/1 85/6           | <b>precise [1]</b> 17/5               | 166/14 166/15 166/19                          | 65/15 65/22 99/11                             |
|  | 128/11 142/14                 | <b>precision [1]</b> 186/4            | 166/21 167/3                                  | 99/13 107/6 109/21                            |
|  | <b>possibly [2]</b> 123/12    | <b>predecessor [2]</b> 176/4 178/10   | <b>private [2]</b> 20/20 22/6                 | 118/21 148/8 162/4                            |
|  | 129/11                        | <b>preferred [1]</b> 138/20           | <b>privilege [27]</b> 2/10                    | 162/24  |
|  | <b>post [110]</b> 4/25 7/19   | <b>Preparation [1]</b> 106/13         | 2/17 3/9 58/6 62/10                           | <b>produces [1]</b> 162/7                     |
|  | 7/22 8/17 10/6 13/6           | <b>prepare [1]</b> 129/2              | 63/5 63/6 63/12 64/4                          | <b>producing [1]</b> 65/19                    |
|  | 13/14 13/19 14/15             | <b>prepared [2]</b> 19/16             | 69/13 73/9 73/11                              | <b>product [10]</b> 109/2                     |
|  | 15/11 15/12 17/14             | 165/4                                 | 73/12 73/22 73/24                             | 109/5 109/8 109/13                            |
|  | 18/8 18/13 20/3 20/14         | <b>preparing [1]</b> 95/16            | 74/3 74/14 74/19 75/2                         | 110/25 111/3 128/10                           |
|  | 20/25 22/7 22/19 23/7         | <b>presence [1]</b> 99/9              | 76/23 84/2 84/14                              | 136/21 168/9 171/17                           |
|  | 23/8 23/11 24/1 25/10         | <b>present [6]</b> 24/10              | 84/24 86/18 86/22                             | <b>production [3]</b> 61/12                   |
|  | 25/18 26/17 26/21             | 24/13 39/10 40/17                     | 108/18 112/1                                  | 62/2 64/23                                    |
|  | 26/22 28/12 28/12             | 89/6 150/17                           | <b>privileged [4]</b> 80/13                   | <b>products [5]</b> 10/19                     |
|  | 28/16 28/25 32/9 47/4         | <b>presentation [1]</b> 99/16         |   | 10/21 10/23 11/3                              |
|  | 47/23 48/1 48/3 48/4          | <b>presenting [1]</b> 95/16           |   | 14/25   |
|  | 48/6 49/16 50/3 50/22         | <b>presently [1]</b> 29/3             |   | <b>professional [2]</b> 108/18 125/15         |
|  | 54/4 54/25 55/13              |                                       |   | <b>proficiency [1]</b> 179/6                  |
|  | 55/15 58/2 58/12              |                                       |   | <b>proficient [1]</b> 176/8                   |



|  |  |  |  |   |
|--|--|--|--|---|
| <b>P</b>   | <b>prospective [1]</b> 34/15   | <b>quarter [1]</b> 187/3   | 152/17   | 132/14 134/13 134/24  |
| <b>profile [1]</b> 15/8  | <b>protect [2]</b> 24/1 129/18   | <b>quarterly [3]</b> 185/6 185/24 186/2  | <b>reaches [1]</b> 81/11   | 136/14 136/18 137/11  |
| <b>profiles [1]</b> 15/10  | <b>protocol [13]</b> 94/2 94/8 94/14 94/22 95/2 96/24 99/3 99/5 99/23 100/13 100/19 132/23 141/5   | <b>queries [3]</b> 23/20 24/22 129/10  | <b>reaction [1]</b> 173/1  | 137/11 138/1 138/10   |
| <b>profound [1]</b> 28/12  | <b>prove [1]</b> 95/18   | <b>question [18]</b> 2/4 2/7 2/16 2/23 3/1 29/24 30/9 59/13 66/20 82/6 125/8 145/3 146/19 152/16 158/14 171/13 178/18 199/4            | <b>reactive [1]</b> 175/6  | 138/12 141/4 141/8  |
| <b>programmes [1]</b> 187/14   | <b>proven [2]</b> 125/22 190/13  | <b>Questioned [4]</b> 1/9 195/5 204/4 204/6  | <b>read [20]</b> 8/9 23/6 61/24 89/7 94/25 102/8 102/9 102/10 102/13 106/21 107/11 107/22 108/21 122/16 125/14 131/1 137/24 158/4 172/8 183/14   | 141/10 141/11 141/13 141/14 141/16 141/18 141/20 142/19 144/22 145/2 146/14 147/1 147/11 147/11 147/23 151/2 151/6 151/13 153/7 153/17 154/9 154/13 159/4 159/10 159/23 160/12 160/25 161/12 161/18 162/1 162/8 164/14 166/13 166/18 166/23 167/1 167/6 167/24 167/24 169/2 169/12 170/23 171/19 172/14 173/8 173/15 174/2 174/7 174/10 180/20 180/23 181/20 182/5 183/21 183/24 184/6 184/8 184/11 184/16 185/4 185/5 185/22 186/1 187/21 191/14 193/2 193/2 193/17 194/6 196/6 196/23 197/3 197/6 197/11 197/16 201/21 202/2 202/7 202/19 |
| <b>progress [2]</b> 150/5 182/22   | <b>provide [10]</b> 28/1 61/8 62/15 90/20 96/18 106/24 134/7 150/12 165/1 184/23   | <b>questions [16]</b> 1/11 1/18 2/18 2/20 2/22 7/10 7/23 7/25 168/13 184/3 191/5 195/2 195/12 195/13 202/20 203/1                      | <b>readership [1]</b> 46/3   | 187/11 138/1 138/10   |
| <b>progressed [3]</b> 19/19 86/24 189/3  | <b>providing [3]</b> 1/16 23/21 164/11   | <b>questioning [4]</b> 3/7 3/15 145/24 146/5   | <b>readily [1]</b> 88/7  | 141/14 141/11 141/13 141/14 141/16 141/18 141/20 142/19 144/22 145/2 146/14 147/1 147/11 147/11 147/23 151/2 151/6 151/13 153/7 153/17 154/9 154/13 159/4 159/10 159/23 160/12 160/25 161/12 161/18 162/1 162/8 164/14 166/13 166/18 166/23 167/1 167/6 167/24 167/24 169/2 169/12 170/23 171/19 172/14 173/8 173/15 174/2 174/7 174/10 180/20 180/23 181/20 182/5 183/21 183/24 184/6 184/8 184/11 184/16 185/4 185/5 185/22 186/1 187/21 191/14 193/2 193/2 193/17 194/6 196/6 196/23 197/3 197/6 197/11 197/16 201/21 202/2 202/7 202/19 |
| <b>progressing [1]</b> 182/21  | <b>proving [1]</b> 184/10  | <b>questioning/investigating [1]</b> 145/24  | <b>reading [3]</b> 37/17 49/23 61/24   | 137/11 138/1 138/10   |
| <b>project [1]</b> 9/10  | <b>provision [3]</b> 27/1 157/23 199/15  | <b>questions [16]</b> 1/11 1/18 2/18 2/20 2/22 7/10 7/23 7/25 168/13 184/3 191/5 195/2 195/12 195/13 202/20 203/1                      | <b>reads [3]</b> 95/12 110/23 112/4  | 138/12 141/4 141/8  |
| <b>projects [1]</b> 175/20   | <b>provisions [1]</b> 188/24   | <b>Quirk [1]</b> 118/13  | <b>ready [1]</b> 93/9  | 141/10 141/11 141/13 141/14 141/16 141/18 141/20 142/19 144/22 145/2 146/14 147/1 147/11 147/11 147/23 151/2 151/6 151/13 153/7 153/17 154/9 154/13 159/4 159/10 159/23 160/12 160/25 161/12 161/18 162/1 162/8 164/14 166/13 166/18 166/23 167/1 167/6 167/24 167/24 169/2 169/12 170/23 171/19 172/14 173/8 173/15 174/2 174/7 174/10 180/20 180/23 181/20 182/5 183/21 183/24 184/6 184/8 184/11 184/16 185/4 185/5 185/22 186/1 187/21 191/14 193/2 193/2 193/17 194/6 196/6 196/23 197/3 197/6 197/11 197/16 201/21 202/2 202/7 202/19 |
| <b>promised [1]</b> 198/8  | <b>public [5]</b> 2/3 26/21 38/7 55/3 96/5   | <b>quite [8]</b> 94/24 130/11 133/24 137/2 137/3 168/21 190/4 196/3  | <b>real [3]</b> 25/6 157/3 199/18  | 137/11 138/1 138/10   |
| <b>proper [3]</b> 90/20 131/17 177/21  | <b>public-spirited [1]</b> 96/5  | <b>quorum [1]</b> 185/2  | <b>realise [1]</b> 58/25   | 138/12 141/4 141/8  |
| <b>properly [2]</b> 95/22 127/14   | <b>publication [1]</b> 138/6   | <b>R</b>   | <b>realistic [1]</b> 110/2   | 141/10 141/11 141/13 141/14 141/16 141/18 141/20 142/19 144/22 145/2 146/14 147/1 147/11 147/11 147/23 151/2 151/6 151/13 153/7 153/17 154/9 154/13 159/4 159/10 159/23 160/12 160/25 161/12 161/18 162/1 162/8 164/14 166/13 166/18 166/23 167/1 167/6 167/24 167/24 169/2 169/12 170/23 171/19 172/14 173/8 173/15 174/2 174/7 174/10 180/20 180/23 181/20 182/5 183/21 183/24 184/6 184/8 184/11 184/16 185/4 185/5 185/22 186/1 187/21 191/14 193/2 193/2 193/17 194/6 196/6 196/23 197/3 197/6 197/11 197/16 201/21 202/2 202/7 202/19 |
| <b>proposal [2]</b> 137/23 140/15  | <b>publicity [7]</b> 156/21 157/4 157/7 159/22 161/3 161/5 161/7   | <b>racial [1]</b> 116/13   | <b>realistically [1]</b> 164/19  | 137/11 138/1 138/10   |
| <b>proposals [1]</b> 159/3   | <b>pull [1]</b> 101/25   | <b>racially [1]</b> 114/14   | <b>reality [1]</b> 67/17   | 137/11 138/1 138/10   |
| <b>propose [1]</b> 170/17  | <b>purely [3]</b> 14/18 117/5 167/18   | <b>radar [7]</b> 61/9 61/20 62/16 62/20 63/13 63/15 64/21  | <b>really [8]</b> 7/7 18/18 65/22 115/7 118/7 123/22 157/21 199/8  | 137/11 138/1 138/10   |
| <b>propriety [1]</b> 85/14   | <b>purpose [23]</b> 34/13 34/18 60/22 69/20 71/20 72/2 84/6 84/11 84/15 84/18 88/15 88/16 97/11 106/21 106/23 115/9 115/21 116/3 116/9 116/10 116/20 120/16 144/24 | <b>raise [2]</b> 58/9 166/15   | <b>rearrange [1]</b> 99/22   | 137/11 138/1 138/10   |
| <b>pros [1]</b> 170/16   | <b>raises [1]</b> 196/2  | <b>raised [15]</b> 56/10 73/5 74/12 90/15 90/25 142/17 145/13 166/24 167/2 178/3 179/17 200/15 201/25 202/3 202/5                      | <b>reason [14]</b> 7/6 19/20 28/13 28/18 76/6 112/14 169/13 170/4 170/9 171/16 171/23 172/1 172/6 181/18   | 137/11 138/1 138/10   |
| <b>prosecute [8]</b> 14/22 15/14 32/2 65/20 95/20 101/17 156/17 162/3  | <b>raising [1]</b> 76/8  | <b>raise [2]</b> 58/9 166/15   | <b>reasonably [2]</b> 96/7 98/16   | 137/11 138/1 138/10   |
| <b>prosecuted [10]</b> 15/20 15/23 100/23 103/1 103/7 116/16 116/17 116/18 159/7 161/8   | <b>ramifications [1]</b> 111/19  | <b>raised [15]</b> 56/10 73/5 74/12 90/15 90/25 142/17 145/13 166/24 167/2 178/3 179/17 200/15 201/25 202/3 202/5                      | <b>reasoning [1]</b> 172/12  | 137/11 138/1 138/10   |
| <b>prosecuting [6]</b> 15/6 132/21 132/24 151/10 153/15 157/8  | <b>ran [1]</b> 176/16  | <b>raises [1]</b> 196/2  | <b>reasons [6]</b> 10/2 16/22 27/15 29/17 72/19 142/11   | 137/11 138/1 138/10   |
| <b>prosecution [31]</b> 14/10 14/18 18/23 19/1 20/24 21/7 22/21 23/10 28/2 31/9 95/17 101/20 102/21 103/3 109/24 155/4 176/22 181/2 181/10 181/16 182/21 183/24 184/5 187/9 187/17 191/17 192/1 192/13 193/20 193/21 194/1 | <b>range [4]</b> 24/8 24/21 165/24 174/18  | <b>raising [1]</b> 76/8  | <b>rebut [4]</b> 130/17 131/3 137/19 144/21  | 137/11 138/1 138/10   |
| <b>prosecutions [21]</b> 8/2 15/3 17/21 17/23 18/24 19/20 20/13 20/21 22/6 26/19 27/2 27/4 28/13 28/25 31/1 33/8 151/4 154/1 171/12 171/14 182/1   | <b>rank [1]</b> 6/8  | <b>ramifications [1]</b> 111/19  | <b>rebutting [1]</b> 130/12  | 137/11 138/1 138/10   |
| <b>prosecutor [4]</b> 28/17 95/13 95/25 96/5   | <b>rarely [1]</b> 38/4   | <b>ran [1]</b> 176/16  | <b>recall [158]</b> 6/23 7/1 8/13 9/8 11/7 12/25 15/24 19/11 20/6 21/14 22/1 22/12 24/6 24/7 25/6 29/21 29/23 30/1 30/10 30/18 30/23 31/3 32/6 37/7 37/25 39/4 41/21 41/24 42/17 42/21 45/13 45/14 45/21 47/25 48/10 48/12 51/23 53/1 54/8 54/11 54/24 56/6 57/1 61/2 65/2 65/5 65/8 67/15 76/2 76/2 78/18 89/14 91/20 93/11 103/8 103/16 103/19 105/21 106/4 114/24 115/15 117/20 122/9 126/4 126/5 127/21 130/19 | 137/11 138/1 138/10   |
| <b>prosecutor's [1]</b> 157/18   | <b>rather [20]</b> 15/5 15/13 23/4 28/6 32/25 34/1 43/3 56/20 79/3 92/5 95/1 102/15 108/24 116/6 124/10 145/8 146/16 151/3 152/9 175/6                             | <b>range [4]</b> 24/8 24/21 165/24 174/18  | <b>rearrange [1]</b> 99/22   | 137/11 138/1 138/10   |
| <b>prosecutorial [2]</b> 87/25 189/19  | <b>puts [1]</b> 194/24   | <b>rank [1]</b> 6/8  | <b>reason [14]</b> 7/6 19/20 28/13 28/18 76/6 112/14 169/13 170/4 170/9 171/16 171/23 172/1 172/6 181/18   | 137/11 138/1 138/10   |
| <b>Prosecutors [1]</b> 6/25  | <b>putting [2]</b> 113/10 187/13   | <b>rarely [1]</b> 38/4   | <b>rebut [4]</b> 130/17 131/3 137/19 144/21  | 137/11 138/1 138/10   |
| <b>prospect [1]</b> 110/2  | <b>PwC [1]</b> 138/23  | <b>rather [20]</b> 15/5 15/13 23/4 28/6 32/25 34/1 43/3 56/20 79/3 92/5 95/1 102/15 108/24 116/6 124/10 145/8 146/16 151/3 152/9 175/6 | <b>rebutting [1]</b> 130/12  | 137/11 138/1 138/10   |
|  | <b>Q</b>   | <b>rationale [2]</b> 16/22 23/25   | <b>recall [158]</b> 6/23 7/1 8/13 9/8 11/7 12/25 15/24 19/11 20/6 21/14 22/1 22/12 24/6 24/7 25/6 29/21 29/23 30/1 30/10 30/18 30/23 31/3 32/6 37/7 37/25 39/4 41/21 41/24 42/17 42/21 45/13 45/14 45/21 47/25 48/10 48/12 51/23 53/1 54/8 54/11 54/24 56/6 57/1 61/2 65/2 65/5 65/8 67/15 76/2 76/2 78/18 89/14 91/20 93/11 103/8 103/16 103/19 105/21 106/4 114/24 115/15 117/20 122/9 126/4 126/5 127/21 130/19 | 137/11 138/1 138/10   |
|  | <b>qualifications [2]</b> 4/23 5/15  | <b>re [5]</b> 32/17 39/8 60/19 92/4 145/13   | <b>reception [1]</b> 81/11   | 137/11 138/1 138/10   |
|  | <b>qualified [1]</b> 133/19  | <b>reach [2]</b> 152/5   | <b>reaction [1]</b> 173/1  | 137/11 138/1 138/10   |

|   |  |   |   |   |
|---|--|---|---|---|
| <b>R</b>  | 146/24 165/8 165/25<br>199/19  | 24/22   | 115/16 116/3 184/14<br>184/16 190/15  | 8/23 13/18 19/7 98/23   |
| <b>recommended [2]</b><br>102/21 152/23   | <b>reflected [1]</b> 43/19   | <b>remember [19]</b> 7/13<br>21/11 21/17 24/12  | <b>reports [16]</b> 33/15<br>65/13 65/21 66/1   | <b>responsibility [12]</b><br>12/14 13/6 53/9   |
| <b>recommending [2]</b><br>131/7 131/9  | <b>reflection [3]</b> 58/7<br>147/21 172/17  | 30/3 36/17 37/5 50/11<br>56/9 77/18 80/7 92/14  | 75/20 83/21 103/13<br>105/18 105/21 106/15  | 103/25 134/17 149/19<br>176/20 177/7 177/16   |
| <b>reconciliation [1]</b><br>145/15   | <b>refresh [1]</b> 195/15  | 104/20 126/13 127/7<br>135/1 181/24 186/25  | 106/16 107/4 108/19<br>143/6 169/17 170/16  | 181/15 202/8 202/13   |
| <b>record [21]</b> 70/6<br>70/11 70/17 70/20<br>71/1 72/11 79/23<br>87/15 87/22 88/1 88/6<br>88/17 91/2 95/5 95/14<br>96/19 97/12 99/25<br>104/7 152/15 199/3 | <b>refuse [1]</b> 11/6   | 197/1   | <b>repository [2]</b> 23/17<br>142/16   | <b>responsible [21]</b><br>12/20 13/4 13/7 13/10<br>18/22 31/2 31/8 31/15<br>31/23 74/25 98/2   |
| <b>recorded [8]</b> 38/12<br>39/10 40/2 40/17<br>75/18 90/15 186/18<br>187/22   | <b>regard [2]</b> 179/21<br>180/11   | <b>Remembering [1]</b><br>142/7   | <b>represent [2]</b> 195/7<br>195/9   | 100/7 101/13 105/4<br>105/11 115/16 117/1<br>117/22 135/7 159/12<br>178/7   |
| <b>recording [7]</b> 21/1<br>37/9 59/10 87/4 88/20<br>116/11 116/20   | <b>regarding [3]</b> 121/10<br>122/12 179/17   | <b>remind [1]</b> 2/12  | <b>representative [7]</b><br>2/6 26/4 34/22 51/15<br>97/18 98/17 195/3                        | <b>rest [1]</b> 64/6  |
| <b>records [7]</b> 52/24<br>72/20 78/6 91/11<br>132/6 188/6 198/18  | <b>regardless [2]</b> 82/17<br>164/21  | <b>remit [2]</b> 90/13 182/9  | <b>represented [2]</b> 1/22<br>3/4  | <b>restrain [1]</b> 189/1   |
| <b>recoup [1]</b> 123/15  | <b>regards [4]</b> 61/11<br>64/23 190/8 200/13   | <b>remove [1]</b> 70/25   | <b>representing [1]</b><br>40/19  | <b>restrained [1]</b> 189/10  |
| <b>recourse [1]</b> 23/23   | <b>region [1]</b> 117/13   | <b>renewed [1]</b> 186/23   | <b>reputation [3]</b> 111/21<br>112/16 157/11   | <b>restrictions [1]</b><br>113/21   |
| <b>recovered [2]</b> 188/17<br>189/3  | <b>regular [5]</b> 32/17<br>39/8 77/13 92/4 96/21  | <b>reorder [1]</b> 107/12   | <b>request [10]</b> 8/4<br>49/18 84/25 122/21   | <b>result [3]</b> 141/8<br>155/25 199/16  |
| <b>recoveries [1]</b><br>188/19   | <b>regularly [2]</b> 114/6<br>114/19   | <b>repeat [1]</b> 19/5  | 123/23 132/13 198/17<br>199/16 199/21 199/23  | <b>resultant [1]</b> 156/21   |
| <b>recovery [2]</b> 188/14<br>189/23  | <b>reinforce [1]</b> 125/7   | <b>repeating [2]</b> 15/2<br>24/2   | <b>requested [1]</b> 179/25   | <b>resulted [1]</b> 189/2   |
| <b>recruitment [1]</b> 82/8   | <b>relate [2]</b> 26/23 83/13  | <b>replies [4]</b> 129/25<br>131/20 136/1 143/12  | <b>requests [3]</b> 123/7<br>132/6 145/16   | <b>retain [13]</b> 26/7 51/18<br>87/15 87/22 88/1 88/7<br>88/17 95/5 95/15<br>96/10 96/19 97/12<br>99/25  |
| <b>Red [1]</b> 106/14   | <b>related [5]</b> 23/17<br>23/19 25/14 50/18<br>201/23  | <b>reply [11]</b> 61/3 75/25<br>91/6 91/21 124/5<br>126/25 130/2 131/19<br>135/12 142/21 155/16   | <b>require [5]</b> 74/6<br>74/13 118/18 163/4<br>168/13                                       | <b>retained [16]</b> 25/16<br>37/10 37/18 45/2 45/3<br>50/20 51/6 51/11 52/3<br>52/14 54/17 56/3<br>88/25 89/1 125/24<br>127/4  |
| <b>redefine [1]</b> 99/22   | <b>relates [1]</b> 99/7  | <b>report [89]</b> 16/21<br>33/18 55/1 61/13 62/2<br>64/24 65/1 65/7 65/9<br>65/18 75/24 77/8<br>90/25 102/10 103/9<br>104/6 104/9 106/23<br>107/20 107/21 108/2<br>108/6 108/12 108/24<br>108/24 109/6 109/12<br>110/17 111/4 111/9<br>111/16 111/17 112/12<br>112/17 112/18 114/7<br>114/8 114/9 115/19<br>115/21 115/24 116/10<br>120/17 125/14 129/12<br>131/17 133/23 134/14<br>135/1 140/16 143/7<br>143/20 146/3 146/17<br>151/17 163/16 164/12<br>167/7 167/9 168/14<br>168/14 169/4 169/14<br>169/14 169/21 170/5<br>171/2 171/15 171/24<br>172/2 172/8 172/13<br>172/22 173/3 173/25<br>174/2 183/15 183/19<br>184/15 184/18 188/2<br>188/3 189/15 190/20<br>190/21 195/20 199/5<br>201/5 202/1 | 168/13<br><b>required [9]</b> 10/7<br>10/8 25/17 50/21<br>96/19 100/25 114/8<br>174/19 175/18 | <b>retire [1]</b> 59/16   |
| <b>redolent [1]</b> 146/9   | <b>relating [5]</b> 3/5 22/20<br>23/9 81/13 83/19  | <b>reply [11]</b> 61/3 75/25<br>91/6 91/21 124/5<br>126/25 130/2 131/19<br>135/12 142/21 155/16   | <b>requirement [6]</b><br>25/12 25/24 99/17<br>99/21 112/9 189/21                             | <b>retired [1]</b> 20/2   |
| <b>reduce [6]</b> 46/17<br>46/20 46/21 55/22<br>69/11 187/6   | <b>relation [6]</b> 41/12<br>59/7 101/11 104/2<br>111/8 137/9                                      | <b>report [89]</b> 16/21<br>33/18 55/1 61/13 62/2<br>64/24 65/1 65/7 65/9<br>65/18 75/24 77/8<br>90/25 102/10 103/9<br>104/6 104/9 106/23<br>107/20 107/21 108/2<br>108/6 108/12 108/24<br>108/24 109/6 109/12<br>110/17 111/4 111/9<br>111/16 111/17 112/12<br>112/17 112/18 114/7<br>114/8 114/9 115/19<br>115/21 115/24 116/10<br>120/17 125/14 129/12<br>131/17 133/23 134/14<br>135/1 140/16 143/7<br>143/20 146/3 146/17<br>151/17 163/16 164/12<br>167/7 167/9 168/14<br>168/14 169/4 169/14<br>169/14 169/21 170/5<br>171/2 171/15 171/24<br>172/2 172/8 172/13<br>172/22 173/3 173/25<br>174/2 183/15 183/19<br>184/15 184/18 188/2<br>188/3 189/15 190/20<br>190/21 195/20 199/5<br>201/5 202/1 | <b>requirements [6]</b><br>13/9 13/11 25/3 25/7<br>83/5 119/2                                 | <b>revealed [2]</b> 65/3<br>65/14   |
| <b>reduced [2]</b> 47/19<br>105/7   | <b>relations [1]</b> 150/5   | <b>report [89]</b> 16/21<br>33/18 55/1 61/13 62/2<br>64/24 65/1 65/7 65/9<br>65/18 75/24 77/8<br>90/25 102/10 103/9<br>104/6 104/9 106/23<br>107/20 107/21 108/2<br>108/6 108/12 108/24<br>108/24 109/6 109/12<br>110/17 111/4 111/9<br>111/16 111/17 112/12<br>112/17 112/18 114/7<br>114/8 114/9 115/19<br>115/21 115/24 116/10<br>120/17 125/14 129/12<br>131/17 133/23 134/14<br>135/1 140/16 143/7<br>143/20 146/3 146/17<br>151/17 163/16 164/12<br>167/7 167/9 168/14<br>168/14 169/4 169/14<br>169/14 169/21 170/5<br>171/2 171/15 171/24<br>172/2 172/8 172/13<br>172/22 173/3 173/25<br>174/2 183/15 183/19<br>184/15 184/18 188/2<br>188/3 189/15 190/20<br>190/21 195/20 199/5<br>201/5 202/1 | <b>requiring [1]</b> 16/21  | <b>reveals [1]</b> 29/11  |
| <b>reducing [4]</b> 62/9<br>63/11 64/3 186/20   | <b>relationship [12]</b><br>13/25 14/1 14/2 14/4<br>14/7 14/8 17/11 20/10<br>21/24 22/2 22/4 41/24 | <b>reply [11]</b> 61/3 75/25<br>91/6 91/21 124/5<br>126/25 130/2 131/19<br>135/12 142/21 155/16   | <b>resolve [2]</b> 91/4<br>91/15  | <b>review [25]</b> 27/17<br>28/25 29/2 136/13<br>139/18 140/1 144/9<br>150/21 150/24 152/6<br>154/8 167/15 167/17<br>167/19 167/23 170/4<br>170/10 171/6 171/9<br>173/12 175/12 180/1<br>181/9 182/14 183/6 |
| <b>refer [2]</b> 29/17 44/25  | <b>reliability [11]</b> 9/20<br>11/11 18/16 19/3 19/9<br>19/17 22/20 109/16<br>148/7 162/7 169/18  | <b>report [89]</b> 16/21<br>33/18 55/1 61/13 62/2<br>64/24 65/1 65/7 65/9<br>65/18 75/24 77/8<br>90/25 102/10 103/9<br>104/6 104/9 106/23<br>107/20 107/21 108/2<br>108/6 108/12 108/24<br>108/24 109/6 109/12<br>110/17 111/4 111/9<br>111/16 111/17 112/12<br>112/17 112/18 114/7<br>114/8 114/9 115/19<br>115/21 115/24 116/10<br>120/17 125/14 129/12<br>131/17 133/23 134/14<br>135/1 140/16 143/7<br>143/20 146/3 146/17<br>151/17 163/16 164/12<br>167/7 167/9 168/14<br>168/14 169/4 169/14<br>169/14 169/21 170/5<br>171/2 171/15 171/24<br>172/2 172/8 172/13<br>172/22 173/3 173/25<br>174/2 183/15 183/19<br>184/15 184/18 188/2<br>188/3 189/15 190/20<br>190/21 195/20 199/5<br>201/5 202/1 | <b>resolved [2]</b> 115/1<br>201/12   | <b>resolved [2]</b> 115/1<br>201/12   |
| <b>reference [16]</b> 39/7<br>49/20 60/12 75/13<br>76/15 92/5 104/5<br>117/7 126/1 137/15<br>150/18 167/22 173/14<br>173/19 179/14 198/17                     | <b>reliable [8]</b> 86/13<br>95/21 130/25 165/14<br>165/17 165/20 166/6<br>168/6                   | <b>report [89]</b> 16/21<br>33/18 55/1 61/13 62/2<br>64/24 65/1 65/7 65/9<br>65/18 75/24 77/8<br>90/25 102/10 103/9<br>104/6 104/9 106/23<br>107/20 107/21 108/2<br>108/6 108/12 108/24<br>108/24 109/6 109/12<br>110/17 111/4 111/9<br>111/16 111/17 112/12<br>112/17 112/18 114/7<br>114/8 114/9 115/19<br>115/21 115/24 116/10<br>120/17 125/14 129/12<br>131/17 133/23 134/14<br>135/1 140/16 143/7<br>143/20 146/3 146/17<br>151/17 163/16 164/12<br>167/7 167/9 168/14<br>168/14 169/4 169/14<br>169/14 169/21 170/5<br>171/2 171/15 171/24<br>172/2 172/8 172/13<br>172/22 173/3 173/25<br>174/2 183/15 183/19<br>184/15 184/18 188/2<br>188/3 189/15 190/20<br>190/21 195/20 199/5<br>201/5 202/1 | <b>resolving [2]</b> 90/21<br>123/13  | <b>resolving [2]</b> 90/21<br>123/13  |
| <b>referenced [1]</b><br>144/11   | <b>reliance [2]</b> 18/12<br>151/4   | <b>report [89]</b> 16/21<br>33/18 55/1 61/13 62/2<br>64/24 65/1 65/7 65/9<br>65/18 75/24 77/8<br>90/25 102/10 103/9<br>104/6 104/9 106/23<br>107/20 107/21 108/2<br>108/6 108/12 108/24<br>108/24 109/6 109/12<br>110/17 111/4 111/9<br>111/16 111/17 112/12<br>112/17 112/18 114/7<br>114/8 114/9 115/19<br>115/21 115/24 116/10<br>120/17 125/14 129/12<br>131/17 133/23 134/14<br>135/1 140/16 143/7<br>143/20 146/3 146/17<br>151/17 163/16 164/12<br>167/7 167/9 168/14<br>168/14 169/4 169/14<br>169/14 169/21 170/5<br>171/2 171/15 171/24<br>172/2 172/8 172/13<br>172/22 173/3 173/25<br>174/2 183/15 183/19<br>184/15 184/18 188/2<br>188/3 189/15 190/20<br>190/21 195/20 199/5<br>201/5 202/1 | <b>respect [7]</b> 2/15<br>56/17 154/5 182/9<br>192/7 198/19 199/1                            | <b>respect [7]</b> 2/15<br>56/17 154/5 182/9<br>192/7 198/19 199/1  |
| <b>referred [7]</b> 42/5 42/9<br>60/4 71/23 125/9<br>144/8 152/18   | <b>rely [3]</b> 2/16 95/19<br>194/18   | <b>report [89]</b> 16/21<br>33/18 55/1 61/13 62/2<br>64/24 65/1 65/7 65/9<br>65/18 75/24 77/8<br>90/25 102/10 103/9<br>104/6 104/9 106/23<br>107/20 107/21 108/2<br>108/6 108/12 108/24<br>108/24 109/6 109/12<br>110/17 111/4 111/9<br>111/16 111/17 112/12<br>112/17 112/18 114/7<br>114/8 114/9 115/19<br>115/21 115/24 116/10<br>120/17 125/14 129/12<br>131/17 133/23 134/14<br>135/1 140/16 143/7<br>143/20 146/3 146/17<br>151/17 163/16 164/12<br>167/7 167/9 168/14<br>168/14 169/4 169/14<br>169/14 169/21 170/5<br>171/2 171/15 171/24<br>172/2 172/8 172/13<br>172/22 173/3 173/25<br>174/2 183/15 183/19<br>184/15 184/18 188/2<br>188/3 189/15 190/20<br>190/21 195/20 199/5<br>201/5 202/1 | <b>respective [5]</b> 33/16<br>87/19 176/1 177/1<br>177/2                                     | <b>respective [5]</b> 33/16<br>87/19 176/1 177/1<br>177/2   |
| <b>referring [8]</b> 58/12<br>58/16 58/19 58/21<br>58/22 61/18 138/5<br>180/3   | <b>remain [1]</b> 28/21  | <b>report [89]</b> 16/21<br>33/18 55/1 61/13 62/2<br>64/24 65/1 65/7 65/9<br>65/18 75/24 77/8<br>90/25 102/10 103/9<br>104/6 104/9 106/23<br>107/20 107/21 108/2<br>108/6 108/12 108/24<br>108/24 109/6 109/12<br>110/17 111/4 111/9<br>111/16 111/17 112/12<br>112/17 112/18 114/7<br>114/8 114/9 115/19<br>115/21 115/24 116/10<br>120/17 125/14 129/12<br>131/17 133/23 134/14<br>135/1 140/16 143/7<br>143/20 146/3 146/17<br>151/17 163/16 164/12<br>167/7 167/9 168/14<br>168/14 169/4 169/14<br>169/14 169/21 170/5<br>171/2 171/15 171/24<br>172/2 172/8 172/13<br>172/22 173/3 173/25<br>174/2 183/15 183/19<br>184/15 184/18 188/2<br>188/3 189/15 190/20<br>190/21 195/20 199/5<br>201/5 202/1 | <b>respects [1]</b> 127/15  | <b>respects [1]</b> 127/15  |
| <b>refers [4]</b> 98/5<br>109/13 180/5 180/8  | <b>remained [1]</b> 40/24  | <b>report [89]</b> 16/21<br>33/18 55/1 61/13 62/2<br>64/24 65/1 65/7 65/9<br>65/18 75/24 77/8<br>90/25 102/10 103/9<br>104/6 104/9 106/23<br>107/20 107/21 108/2<br>108/6 108/12 108/24<br>108/24 109/6 109/12<br>110/17 111/4 111/9<br>111/16 111/17 112/12<br>112/17 112/18 114/7<br>114/8 114/9 115/19<br>115/21 115/24 116/10<br>120/17 125/14 129/12<br>131/17 133/23 134/14<br>135/1 140/16 143/7<br>143/20 146/3 146/17<br>151/17 163/16 164/12<br>167/7 167/9 168/14<br>168/14 169/4 169/14<br>169/14 169/21 170/5<br>171/2 171/15 171/24<br>172/2 172/8 172/13<br>172/22 173/3 173/25<br>174/2 183/15 183/19<br>184/15 184/18 188/2<br>188/3 189/15 190/20<br>190/21 195/20 199/5<br>201/5 202/1 | <b>respond [3]</b> 7/9<br>123/23 200/10   | <b>respond [3]</b> 7/9<br>123/23 200/10   |
| <b>reflect [8]</b> 40/10<br>61/22 91/9 108/17   | <b>remedial [1]</b> 60/17  | <b>report [89]</b> 16/21<br>33/18 55/1 61/13 62/2<br>64/24 65/1 65/7 65/9<br>65/18 75/24 77/8<br>90/25 102/10 103/9<br>104/6 104/9 106/23<br>107/20 107/21 108/2<br>108/6 108/12 108/24<br>108/24 109/6 109/12<br>110/17 111/4 111/9<br>111/16 111/17 112/12<br>112/17 112/18 114/7<br>114/8 114/9 115/19<br>115/21 115/24 116/10<br>120/17 125/14 129/12<br>131/17 133/23 134/14<br>135/1 140/16 143/7<br>143/20 146/3 146/17<br>151/17 163/16 164/12<br>167/7 167/9 168/14<br>168/14 169/4 169/14<br>169/14 169/21 170/5<br>171/2 171/15 171/24<br>172/2 172/8 172/13<br>172/22 173/3 173/25<br>174/2 183/15 183/19<br>184/15 184/18 188/2<br>188/3 189/15 190/20<br>190/21 195/20 199/5<br>201/5 202/1 | <b>responded [3]</b> 75/21<br>123/8 172/16  | <b>responded [3]</b> 75/21<br>123/8 172/16  |
|   | <b>remedied [1]</b> 69/19  | <b>report [89]</b> 16/21<br>33/18 55/1 61/13 62/2<br>64/24 65/1 65/7 65/9<br>65/18 75/24 77/8<br>90/25 102/10 103/9<br>104/6 104/9 106/23<br>107/20 107/21 108/2<br>108/6 108/12 108/24<br>108/24 109/6 109/12<br>110/17 111/4 111/9<br>111/16 111/17 112/12<br>112/17 112/18 114/7<br>114/8 114/9 115/19<br>115/21 115/24 116/10<br>120/17 125/14 129/12<br>131/17 133/23 134/14<br>135/1 140/16 143/7<br>143/20 146/3 146/17<br>151/17 163/16 164/12<br>167/7 167/9 168/14<br>168/14 169/4 169/14<br>169/14 169/21 170/5<br>171/2 171/15 171/24<br>172/2 172/8 172/13<br>172/22 173/3 173/25<br>174/2 183/15 183/19<br>184/15 184/18 188/2<br>188/3 189/15 190/20<br>190/21 195/20 199/5<br>201/5 202/1 | <b>response [9]</b> 122/25<br>124/11 125/8 139/11<br>151/20 196/12 199/10<br>200/9 201/7      | <b>response [9]</b> 122/25<br>124/11 125/8 139/11<br>151/20 196/12 199/10<br>200/9 201/7  |
|   | <b>remedies [2]</b> 23/20  | <b>report [89]</b> 16/21<br>33/18 55/1 61/13 62/2<br>64/24 65/1 65/7 65/9<br>65/18 75/24 77/8<br>90/25 102/10 103/9<br>104/6 104/9 106/23<br>107/20 107/21 108/2<br>108/6 108/12 108/24<br>108/24 109/6 109/12<br>110/17 111/4  |   |   |

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| <b>R</b> | <b>root [5]</b> 14/24 92/1<br>201/9 201/12 201/13<br><b>Rose [7]</b> 61/13 62/2<br>64/24 65/1 65/6 75/24<br>77/7<br><b>round [1]</b> 146/21<br><b>route [2]</b> 77/12<br>190/14<br><b>routed [1]</b> 124/3<br><b>routine [1]</b> 82/25<br><b>Royal [15]</b> 8/21 11/20<br>11/23 12/6 12/10<br>12/11 12/12 12/16<br>12/22 17/2 17/7<br>181/21 192/12 193/19<br>194/1<br><b>Royal Mail [1]</b> 192/12<br><b>rubber [1]</b> 102/22<br><b>rule [1]</b> 2/25<br><b>run [2]</b> 75/19 176/9<br><b>running [5]</b> 58/3<br>58/13 76/13 133/15<br>176/7<br><b>Rupert [1]</b> 57/21 | 118/14 118/19 121/20<br>125/15 128/18 134/5<br>135/10 147/6 151/9<br>158/17 159/5 159/16<br>159/23 162/3 166/10<br>166/22 169/20 169/22<br>170/7 173/5 174/24<br>175/10 175/15 178/5<br>180/12 180/13 180/15<br>182/8 182/20 183/11<br>190/12 191/7 191/13<br>193/6 194/8 194/15<br>194/22 196/8 200/3<br>200/10 200/24<br><b>saying [35]</b> 25/1<br>37/16 38/12 40/2 49/9<br>49/17 53/21 63/6 66/1<br>67/2 73/19 76/13<br>76/24 77/2 77/3 81/20<br>85/21 102/18 112/24<br>113/7 129/14 140/23<br>143/3 158/4 158/6<br>158/12 158/13 159/20<br>184/6 187/3 192/8<br>197/1 199/21 199/21<br>200/2<br><b>says [44]</b> 23/6 25/9<br>26/16 27/13 34/20<br>36/23 38/5 38/22<br>39/23 41/14 54/2<br>60/16 67/10 71/18<br>71/25 86/9 91/14 94/2<br>121/6 122/24 123/6<br>136/6 137/13 138/13<br>150/2 155/17 161/21<br>164/6 164/15 167/15<br>168/18 170/13 171/5<br>173/10 180/11 192/2<br>192/4 195/16 195/21<br>196/9 198/6 198/14<br>198/21 201/15<br><b>SC [1]</b> 78/7<br><b>scale [1]</b> 128/18<br><b>scenes [2]</b> 70/1<br>71/11<br><b>scope [3]</b> 27/16 35/1<br>40/4<br><b>score [2]</b> 104/15<br>106/9<br><b>scoring [1]</b> 119/7<br><b>Scotland [1]</b> 179/7<br><b>Scott [24]</b> 1/7 1/8<br>1/10 1/14 1/22 2/3<br>2/11 3/12 3/16 64/18<br>69/6 79/3 79/5 91/5<br>119/22 120/14 147/22<br>158/18 160/16 162/21<br>195/1 195/7 201/7<br>204/2<br><b>scrap [2]</b> 42/24 45/11<br><b>scrapped [6]</b> 41/18<br>42/15 42/16 42/21<br>42/22 42/24<br><b>scrapping [1]</b> 45/19 | <b>screen [1]</b> 5/8<br><b>scroll [30]</b> 26/12<br>34/11 38/10 81/25<br>90/9 94/18 98/12<br>107/25 108/5 108/10<br>110/13 110/14 110/22<br>120/22 120/25 123/4<br>126/25 129/23 129/24<br>131/24 135/17 136/5<br>136/5 145/17 149/8<br>155/8 155/14 186/17<br>192/4 200/21<br><b>scrolling [4]</b> 36/15<br>104/8 134/1 139/3<br><b>scrutiny [1]</b> 101/19<br><b>second [17]</b> 3/24 4/8<br>32/6 36/22 38/12 39/6<br>40/1 50/7 50/16 55/8<br>57/4 62/10 69/11<br>69/14 90/8 176/3<br>180/14<br><b>secondly [3]</b> 56/12<br>62/1 129/4<br><b>secret [1]</b> 112/6<br><b>Secretariat [2]</b><br>185/14 185/19<br><b>section [2]</b> 97/17<br>114/8<br><b>sections [3]</b> 96/24<br>98/1 98/2<br><b>secure [1]</b> 157/12<br><b>secured [1]</b> 154/6<br><b>security [122]</b> 5/12<br>5/13 7/4 8/16 8/20<br>10/4 10/5 11/9 11/14<br>11/20 11/24 12/2 12/2<br>12/7 12/9 12/10 12/17<br>12/20 12/21 13/8 13/8<br>13/11 13/13 13/19<br>14/15 16/1 17/15<br>17/19 18/21 19/6<br>22/10 31/8 32/23 33/6<br>33/7 33/12 33/14<br>33/16 36/7 36/11<br>39/11 39/13 39/13<br>40/19 43/10 43/23<br>44/8 46/7 47/23 54/5<br>54/21 56/12 65/24<br>69/17 72/18 77/14<br>77/23 91/3 91/14<br>91/18 98/8 100/5<br>103/4 103/16 103/23<br>103/24 105/3 105/5<br>105/16 106/11 107/6<br>109/1 109/4 109/8<br>110/24 111/2 111/22<br>113/4 113/7 113/14<br>114/3 117/6 117/11<br>117/17 118/1 132/7<br>132/10 134/9 134/18<br>134/20 135/3 137/5<br>141/2 143/1 145/11<br>149/17 162/2 168/9<br>168/19 168/23 174/17 | 175/4 175/16 176/24<br>177/9 177/19 177/25<br>178/2 179/3 179/21<br>179/22 185/15 185/16<br>185/17 185/19 188/21<br>188/25 190/15 190/20<br>191/25 192/20 199/24<br><b>see [109]</b> 1/3 14/25<br>15/8 26/13 31/6 32/16<br>32/23 33/2 39/8 39/10<br>39/15 40/16 41/10<br>41/13 42/4 42/6 54/16<br>57/10 57/14 61/3 64/1<br>64/14 80/3 80/6 90/10<br>90/15 93/21 93/24<br>94/11 94/15 94/17<br>95/1 95/7 98/25<br>101/23 103/22 104/4<br>104/12 104/19 106/10<br>106/17 107/15 107/25<br>110/17 112/13 114/2<br>114/12 120/10 120/23<br>121/17 123/3 124/6<br>126/6 126/16 126/17<br>126/22 129/22 131/1<br>131/10 131/24 131/25<br>134/2 136/20 136/23<br>140/22 142/1 142/20<br>144/3 145/5 146/15<br>147/4 149/8 149/22<br>151/7 154/18 154/21<br>155/11 160/13 162/18<br>163/15 163/19 165/23<br>166/11 166/16 167/9<br>167/10 167/25 168/18<br>172/19 179/8 185/12<br>186/4 186/19 186/22<br>187/3 187/22 188/5<br>190/7 192/1 192/10<br>193/8 197/21 198/4<br>200/9 200/21 201/2<br>201/6 201/8 202/15<br><b>seeing [6]</b> 29/23 56/6<br>106/3 126/13 193/2<br>201/21<br><b>seek [6]</b> 28/6 29/12<br>59/20 133/5 144/23<br>187/6<br><b>seeking [5]</b> 59/3<br>59/15 136/4 169/13<br>169/17<br><b>seeks [1]</b> 34/23<br><b>seem [3]</b> 47/25 127/7<br>155/11<br><b>Seema [4]</b> 195/10<br>197/2 202/3 202/11<br><b>seemed [1]</b> 90/12<br><b>seemingly [1]</b> 104/12<br><b>seems [8]</b> 79/15<br>109/25 122/19 145/13<br>147/15 148/16 152/22<br>200/21<br><b>seen [28]</b> 30/1 43/7<br>43/15 44/1 56/24 |
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|   |  |  |  |  |
|---|--|--|--|--|
| <b>S</b>  | 101/5 105/13 162/21<br>163/7   | 95/3 96/12 100/19<br>101/13 102/25 103/6<br>107/10 107/16 107/20<br>107/22 108/2 108/15<br>109/9 111/6 120/2<br>123/23 127/23 128/8<br>128/14 128/23 129/1<br>129/4 129/7 129/8<br>129/11 130/6 130/9<br>133/5 138/16 142/12<br>148/8 153/10 157/6<br>165/1 166/2 167/3<br>181/16 193/23 194/1<br>195/19 202/17  | <b>simply [2]</b> 37/9<br>158/13<br><b>since [2]</b> 156/3<br>161/23<br><b>Singh [12]</b> 41/20<br>42/12 45/11 45/13<br>47/1 47/15 47/16 55/9<br>79/2 79/4 90/5 90/11<br><b>single [9]</b> 15/18<br>23/15 23/23 24/20<br>32/8 56/21 102/18<br>124/18 146/15<br><b>sir [13]</b> 1/3 3/16 64/5<br>64/10 64/14 119/15<br>120/5 120/10 162/9<br>162/18 195/3 195/6<br>202/23<br><b>situation [2]</b> 24/2<br>155/2<br><b>situations [1]</b> 175/19<br><b>skilling [1]</b> 117/18<br><b>skip [1]</b> 98/21<br><b>SL [2]</b> 150/12 150/13<br><b>SL/DK [1]</b> 150/12<br><b>slide [2]</b> 188/12<br>188/13<br><b>slightly [1]</b> 182/10<br><b>small [1]</b> 6/6<br><b>smaller [1]</b> 117/8<br><b>SME [1]</b> 19/12<br><b>Smith [26]</b> 36/17<br>36/17 36/19 41/9 42/4<br>42/12 42/13 47/2 55/9<br>78/5 78/25 79/6 79/16<br>123/5 124/4 127/22<br>129/14 130/24 131/6<br>131/9 131/20 133/11<br>139/20 139/20 143/3<br>149/11<br><b>Smith's [1]</b> 126/25<br><b>so [187]</b> 3/9 5/4 6/18<br>7/10 7/16 8/10 9/5 9/9<br>10/12 10/16 12/5 12/6<br>12/23 13/2 13/13<br>13/17 13/21 14/20<br>15/8 15/16 17/4 18/15<br>18/15 18/19 19/20<br>20/21 21/16 22/10<br>22/16 23/3 24/24<br>25/12 25/23 28/25<br>29/16 31/3 31/8 33/4<br>33/9 33/15 33/20 34/2<br>34/5 35/8 35/18 36/21<br>37/10 37/18 39/8 40/6<br>40/15 43/14 45/4<br>46/15 47/16 48/21<br>49/17 50/8 53/14 60/4<br>61/24 67/2 67/8 70/9<br>73/10 73/18 75/1<br>76/24 77/25 81/2 81/7<br>81/20 82/16 83/6 84/2<br>84/24 85/8 86/6 86/23<br>87/11 87/16 88/3<br>88/14 94/5 94/12 | 101/9 101/22 103/12<br>103/24 104/17 105/10<br>106/4 106/12 107/4<br>107/11 109/18 109/25<br>111/8 112/24 113/8<br>114/14 117/8 117/18<br>118/6 118/9 120/1<br>120/5 120/19 123/8<br>124/1 125/14 126/6<br>126/9 126/14 128/2<br>128/8 129/2 129/14<br>130/12 131/3 132/2<br>132/23 135/22 136/25<br>139/10 139/16 140/13<br>143/18 147/6 148/19<br>149/19 149/22 151/23<br>152/14 152/16 153/2<br>155/5 158/12 160/13<br>161/10 161/21 162/12<br>170/3 171/21 172/8<br>172/10 173/25 176/24<br>177/3 177/25 179/2<br>179/10 180/17 180/20<br>181/2 181/14 181/17<br>183/5 183/6 185/4<br>185/19 186/10 186/10<br>187/15 190/7 190/22<br>190/25 191/24 192/10<br>192/23 193/3 193/22<br>194/10 194/18 196/2<br>196/11 196/14 196/19<br>197/1 197/5 197/7<br>198/10 199/20 200/1<br>200/4 202/22 203/6<br><b>so-called [3]</b> 50/8<br>87/11 125/14<br><b>soft [1]</b> 81/5<br><b>solely [1]</b> 111/15<br><b>solicitor [11]</b> 1/24<br>1/25 3/5 36/21 38/5<br>87/20 98/12 98/13<br>127/4 127/5 127/8<br><b>solicitors [12]</b> 21/17<br>26/4 31/3 48/21 64/2<br>73/2 86/17 86/21<br>87/18 87/20 123/1<br>181/12<br><b>some [31]</b> 21/6 38/1<br>48/1 52/10 55/13<br>76/15 81/21 85/14<br>94/6 113/7 119/10<br>122/7 122/15 122/17<br>130/10 134/7 137/18<br>140/6 142/5 143/15<br>145/16 149/13 157/6<br>159/7 163/9 176/21<br>177/5 180/15 181/3<br>193/8 195/12<br><b>somebody [12]</b> 44/11<br>65/25 92/13 92/20<br>92/22 93/9 102/15<br>115/5 124/1 131/2<br>138/5 199/24<br><b>someone [9]</b> 84/22 |
| <b>seen... [23]</b> 57/25<br>62/22 63/18 63/25<br>94/21 106/2 114/25<br>122/3 122/5 122/6<br>124/17 132/15 137/16<br>149/24 156/23 157/1<br>160/16 160/23 162/21<br>167/2 184/1 201/18<br>201/20<br><b>seizing [1]</b> 189/15<br><b>self [2]</b> 2/11 3/6<br><b>self-incrimination [2]</b><br>2/11 3/6<br><b>sell [1]</b> 11/2<br><b>selling [3]</b> 10/15<br>10/19 10/22<br><b>send [2]</b> 78/13 143/5<br><b>sending [5]</b> 78/12<br>84/22 158/25 163/20<br>198/11<br><b>senior [15]</b> 10/4<br>16/21 17/1 33/6 69/16<br>114/2 117/25 119/13<br>137/3 140/4 149/9<br>149/17 160/5 165/9<br>178/6<br><b>seniority [1]</b> 193/9<br><b>sense [4]</b> 116/8<br>137/20 138/17 198/12<br><b>sensible [2]</b> 139/12<br>196/13<br><b>sensitive [1]</b> 175/18<br><b>sent [19]</b> 7/12 33/22<br>35/9 57/11 65/21 76/3<br>91/25 103/2 103/18<br>126/16 142/12 144/3<br>149/22 149/24 166/16<br>167/5 180/21 183/13<br>198/4<br><b>sentence [8]</b> 36/6<br>37/1 43/1 50/15 50/16<br>69/24 176/3 192/18<br><b>sentiments [1]</b> 165/8<br><b>separate [2]</b> 119/16<br>184/13<br><b>separately [2]</b> 27/4<br>139/19<br><b>separation [10]</b><br>22/12 22/13 22/14<br>22/16 181/4 181/20<br>181/22 182/1 191/18<br>191/19<br><b>September [5]</b> 5/2<br>92/9 198/5 200/10<br>201/3<br><b>September 2010 [1]</b><br>201/3<br><b>September 2013 [1]</b><br>92/9<br><b>sequence [1]</b> 107/11<br><b>Sergeant [1]</b> 6/9<br><b>series [5]</b> 57/12 | <b>serious [3]</b> 87/18<br>158/7 174/18<br><b>served [1]</b> 5/22<br><b>service [2]</b> 5/23<br>198/16<br><b>services [6]</b> 10/14<br>26/21 28/10 74/1 85/7<br>85/10<br><b>set [23]</b> 34/21 60/18<br>69/15 81/14 84/12<br>90/22 97/13 97/21<br>98/1 98/25 121/23<br>123/14 129/4 133/14<br>138/15 155/19 178/19<br>178/21 186/3 189/8<br>189/13 191/5 195/2<br><b>sets [2]</b> 43/20 122/15<br><b>setting [5]</b> 25/7 32/8<br>59/8 121/25 151/23<br><b>settled [1]</b> 125/24<br><b>seven [3]</b> 5/24 94/24<br>162/5<br><b>seven years [1]</b> 5/24<br><b>shaking [1]</b> 152/12<br><b>shall [1]</b> 138/16<br><b>shape [1]</b> 125/7<br><b>share [1]</b> 202/8<br><b>she [40]</b> 30/17 46/19<br>55/21 56/10 60/16<br>61/22 62/1 62/1 62/4<br>63/3 65/6 66/8 69/10<br>69/11 71/15 76/4<br>76/21 77/6 80/7 85/2<br>92/20 92/21 92/22<br>92/25 93/2 93/3 93/5<br>93/8 93/16 93/17 94/2<br>121/6 122/15 122/17<br>122/24 123/6 129/24<br>131/12 134/14 142/25<br><b>she's [2]</b> 65/16 196/9<br><b>sheets [1]</b> 106/9<br><b>short [4]</b> 18/25 64/12<br>120/8 162/16<br><b>shortcomings [2]</b><br>58/4 58/14<br><b>shortfalls [1]</b> 74/10<br><b>shorthand [1]</b> 2/10<br><b>shortly [1]</b> 136/25<br><b>shot [1]</b> 172/21<br><b>should [82]</b> 2/14 2/25<br>3/2 3/17 3/20 3/20 4/9<br>25/14 28/1 28/5 28/6<br>28/14 28/20 31/19<br>31/22 46/7 50/17<br>52/20 52/25 54/4<br>54/22 61/19 62/5<br>62/21 62/21 63/22<br>63/23 63/23 65/13<br>71/16 75/1 76/17<br>81/17 82/17 82/21<br>83/18 84/13 86/10<br>86/14 86/22 90/20 | 95/3 96/12 100/19<br>101/13 102/25 103/6<br>107/10 107/16 107/20<br>107/22 108/2 108/15<br>109/9 111/6 120/2<br>123/23 127/23 128/8<br>128/14 128/23 129/1<br>129/4 129/7 129/8<br>129/11 130/6 130/9<br>133/5 138/16 142/12<br>148/8 153/10 157/6<br>165/1 166/2 167/3<br>181/16 193/23 194/1<br>195/19 202/17<br><b>shouldn't [4]</b> 119/20<br>166/17 193/25 194/18<br><b>shouted [1]</b> 161/19<br><b>show [6]</b> 31/15 63/17<br>156/7 189/15 194/10<br>197/19<br><b>showed [2]</b> 137/17<br>193/5<br><b>showing [3]</b> 118/4<br>123/12 147/5<br><b>shown [6]</b> 31/20<br>31/22 56/4 74/11<br>119/5 180/15<br><b>shows [3]</b> 79/23 89/6<br>147/12<br><b>shred [2]</b> 78/12<br>124/18<br><b>shredded [1]</b> 101/14<br><b>shredding [2]</b> 50/8<br>87/12<br><b>shut [2]</b> 140/19 160/9<br><b>Siamese [1]</b> 116/16<br><b>sic [2]</b> 18/4 30/1<br><b>Sicilian [1]</b> 116/18<br><b>side [1]</b> 153/1<br><b>sight [1]</b> 74/2<br><b>sign [5]</b> 125/16<br>182/14 182/16 182/17<br>192/12<br><b>signature [3]</b> 3/20<br>3/21 4/16<br><b>signed [3]</b> 124/6<br>154/19 193/19<br><b>significance [1]</b><br>49/13<br><b>significant [7]</b> 7/7<br>111/12 111/14 153/16<br>153/19 170/17 189/2<br><b>signing [3]</b> 182/20<br>183/3 184/4<br><b>similar [7]</b> 39/8 54/9<br>77/8 77/12 104/4<br>113/12 192/15<br><b>similarity [1]</b> 49/20<br><b>Similarly [1]</b> 28/3<br><b>Simon [6]</b> 21/12 47/6<br>57/25 58/6 73/6 77/15<br><b>Simon Clarke [1]</b><br>21/12<br><b>simple [1]</b> 146/23 |  |  |

|   |  |   |   |   |
|---|--|---|---|---|
| <b>S</b>  | 56/21 119/7  | <b>steps [6]</b> 82/1 83/3<br>84/12 96/7 98/16<br>150/5   | 100/22 101/17 102/7<br>103/15 142/17 148/24<br>174/21 176/23 187/7<br>189/17 195/8 195/10   | <b>summarise [1]</b><br>175/16  |
| <b>someone... [8]</b><br>128/20 133/17 140/10<br>152/7 189/23 193/11<br>196/24 197/22   | <b>Springford [1]</b> 80/7   | <b>Steve [3]</b> 57/15 73/7<br>73/15  | <b>subpostmistress [1]</b><br>128/22  | <b>summarising [1]</b><br>30/8  |
| <b>something [13]</b><br>21/10 38/20 38/21<br>58/8 63/16 63/17 87/1<br>94/1 95/8 146/11<br>153/16 161/17 182/18   | <b>staff [15]</b> 83/17 86/10<br>97/19 105/25 113/14<br>114/6 114/19 114/20<br>115/2 115/3 117/2<br>117/4 119/2 175/24<br>199/3  | <b>still [10]</b> 65/14 88/25<br>91/2 94/10 102/23<br>108/22 168/12 189/17<br>194/6 194/8   | <b>subpostmistress's [1]</b> 130/13   | <b>summary [11]</b> 9/14<br>42/6 102/11 102/16<br>127/18 129/15 150/4<br>172/18 179/23 181/14<br>183/15   |
| <b>sometimes [1]</b><br>183/19  | <b>stage [8]</b> 3/7 41/25<br>115/24 141/19 152/22<br>186/12 186/14 199/4  | <b>stolen [2]</b> 156/6<br>190/13   | <b>subscribe [2]</b> 38/23<br>138/7   | <b>superfluous [1]</b><br>90/24   |
| <b>somewhere [1]</b> 140/8  | <b>staggered [2]</b> 158/2<br>159/19   | <b>stop [5]</b> 15/4 34/11<br>36/16 110/13 140/20   | <b>subsequently [4]</b><br>3/23 59/20 63/25<br>85/15  | <b>supervision [6]</b> 13/5<br>109/2 109/4 109/8<br>110/25 111/2  |
| <b>soon [2]</b> 139/5<br>195/24   | <b>stakeholder [1]</b><br>104/9  | <b>stopped [3]</b> 44/20<br>44/24 132/21  | <b>subsidiary [1]</b> 175/11  | <b>supplier [1]</b> 138/20  |
| <b>soonest [1]</b> 149/2  | <b>stakeholders [1]</b><br>107/1   | <b>stopping [5]</b> 45/19<br>70/2 121/11 126/1<br>130/14  | <b>substantive [1]</b><br>160/10  | <b>supply [1]</b> 143/10  |
| <b>sorry [36]</b> 6/16 10/20<br>16/18 19/5 43/18<br>59/13 66/20 70/23<br>71/24 76/11 86/20<br>88/21 94/16 107/16<br>114/17 130/5 131/8<br>132/18 159/10 159/23<br>160/25 164/14 165/22<br>166/14 166/18 167/6<br>168/20 169/8 170/23<br>172/4 173/8 183/11<br>185/16 185/25 197/16<br>202/7 | <b>stamp [1]</b> 102/22  | <b>stored [1]</b> 81/6  | <b>subvert [1]</b> 70/19  | <b>support [16]</b> 10/12<br>18/10 18/12 18/16<br>26/18 80/18 82/10<br>94/1 95/23 99/20<br>129/20 134/6 135/19<br>139/21 157/24 199/17  |
| <b>stamp [1]</b> 102/22   | <b>stamps [2]</b> 10/15<br>10/22   | <b>storybook [1]</b><br>106/24  | <b>success [1]</b> 112/13   | <b>supported [1]</b> 173/20   |
| <b>stamps [2]</b> 10/15<br>10/22  | <b>stand [2]</b> 147/17<br>170/18  | <b>strand [9]</b> 14/17<br>33/13 117/5 117/6<br>119/14 132/9 132/10<br>178/6 179/3  | <b>successful [2]</b><br>111/13 112/2   | <b>supporting [1]</b> 5/14  |
| <b>stand [2]</b> 147/17<br>170/18   | <b>standards [2]</b> 105/13<br>135/4   | <b>strands [5]</b> 33/11<br>117/5 176/1 177/2<br>177/14   | <b>such [39]</b> 2/21 5/15<br>10/22 15/7 26/2 27/2<br>51/7 51/14 53/4 53/7<br>53/9 54/19 55/25<br>65/21 75/15 78/13<br>78/21 84/17 84/20<br>87/25 88/7 88/8 88/12<br>88/13 97/13 97/19<br>98/1 110/5 110/6<br>124/24 132/23 141/6<br>148/11 156/10 161/12<br>168/14 169/14 191/16<br>199/17 | <b>sure [11]</b> 18/19 77/3<br>85/8 113/20 119/22<br>133/18 180/5 190/19<br>192/11 193/3 193/18   |
| <b>standing [3]</b> 19/17<br>171/1 188/9  | <b>standing [3]</b> 19/17<br>171/1 188/9   | <b>strategically [1]</b><br>175/25  | <b>sudden [1]</b> 93/2  | <b>surprise [2]</b> 116/24<br>119/9   |
| <b>start [16]</b> 4/22 20/18<br>20/22 21/10 57/3 60/7<br>80/4 117/11 117/14<br>120/17 120/20 141/23<br>149/5 161/25 163/3<br>203/6  | <b>start [16]</b> 4/22 20/18<br>20/22 21/10 57/3 60/7<br>80/4 117/11 117/14<br>120/17 120/20 141/23<br>149/5 161/25 163/3<br>203/6   | <b>strategy [6]</b> 7/21<br>13/14 14/10 16/22<br>113/7 189/19   | <b>Sue [12]</b> 126/19<br>134/2 134/9 134/11<br>134/19 134/25 134/25<br>142/25 143/5 150/14<br>163/22 163/25  | <b>Susan [50]</b> 30/14<br>30/15 31/17 35/10<br>35/15 35/19 35/25<br>39/22 40/11 43/12<br>43/21 45/7 46/12<br>46/16 48/19 51/3 52/5<br>53/14 53/15 55/18<br>56/9 60/9 61/6 61/17<br>61/18 62/14 64/22<br>64/25 66/16 66/22<br>68/7 68/14 69/1 71/13<br>75/5 76/1 76/25 78/8<br>78/13 78/16 78/20<br>80/10 91/23 92/9<br>92/18 93/15 181/1<br>181/24 182/14 190/23 |
| <b>start [16]</b> 4/22 20/18<br>20/22 21/10 57/3 60/7<br>80/4 117/11 117/14<br>120/17 120/20 141/23<br>149/5 161/25 163/3<br>203/6  | <b>started [1]</b> 81/15   | <b>strike [1]</b> 172/11  | <b>suffice [2]</b> 85/12<br>143/9   | <b>Susan's [2]</b> 91/7<br>91/22  |
| <b>starting [2]</b> 108/1<br>139/17   | <b>starting [2]</b> 108/1<br>139/17  | <b>structure [2]</b> 84/17<br>182/3   | <b>sufficiency [1]</b><br>101/16  | <b>suspect [14]</b> 30/13<br>30/22 72/7 96/15<br>102/9 106/23 107/19<br>111/18 112/10 112/12<br>112/17 140/8 183/15<br>186/11   |
| <b>starts [3]</b> 39/15 95/7<br>174/15  | <b>starts [3]</b> 39/15 95/7<br>174/15   | <b>structured [2]</b> 33/10<br>177/20   | <b>sufficient [4]</b> 10/16<br>148/17 153/3 153/9   | <b>suspect's [3]</b> 115/22<br>115/25 116/11  |
| <b>state [1]</b> 84/23  | <b>state [1]</b> 84/23   | <b>struggle [2]</b> 117/15<br>125/2   | <b>suggest [11]</b> 94/25<br>96/11 99/11 99/13<br>128/3 128/25 130/3<br>130/6 130/10 133/21<br>175/22   | <b>suspects [3]</b> 6/22<br>115/10 116/4  |
| <b>stated [1]</b> 79/18   | <b>stated [1]</b> 79/18  | <b>stuff [1]</b> 183/22   | <b>suggested [4]</b> 57/8<br>130/17 137/21 156/9  | <b>suspend [1]</b> 83/1   |
| <b>statement [33]</b> 3/18<br>3/24 4/1 4/5 4/8 4/18<br>5/6 7/2 7/11 7/24 8/9<br>8/14 28/5 34/6 48/25<br>101/4 101/23 109/9<br>109/11 111/5 118/8<br>128/10 174/14 178/5<br>179/13 180/14 180/15<br>181/8 182/6 191/7<br>199/16 199/18 202/25  | <b>statement [33]</b> 3/18<br>3/24 4/1 4/5 4/8 4/18<br>5/6 7/2 7/11 7/24 8/9<br>8/14 28/5 34/6 48/25<br>101/4 101/23 109/9<br>109/11 111/5 118/8<br>128/10 174/14 178/5<br>179/13 180/14 180/15<br>181/8 182/6 191/7<br>199/16 199/18 202/25 | <b>sub [1]</b> 26/21  | <b>suggesting [4]</b> 77/17<br>139/24 149/25 196/14<br>152/24   | <b>suspends [1]</b> 83/2  |
| <b>statements [5]</b> 1/17<br>1/19 29/19 157/24<br>184/9  | <b>statements [5]</b> 1/17<br>1/19 29/19 157/24<br>184/9   | <b>subheading [1]</b><br>106/15   | <b>suggestion [2]</b> 50/24<br>152/24   | <b>suspicious [1]</b> 199/6   |
| <b>statistics [2]</b> 116/15<br>148/18  | <b>statistics [2]</b> 116/15<br>148/18   | <b>subject [25]</b> 18/4<br>18/9 18/11 19/22<br>46/22 57/11 60/10<br>61/14 66/9 66/18<br>66/24 67/5 67/20<br>75/23 76/10 95/6 99/3<br>99/5 100/1 101/18<br>106/1 142/7 151/15<br>158/18 199/2 | <b>suitable [2]</b> 151/21<br>152/23  | <b>sworn [2]</b> 1/8 204/2  |
| <b>stats [1]</b> 142/5  | <b>stats [1]</b> 142/5   | <b>submitted [3]</b> 6/15<br>6/17 16/24   | <b>suitably [1]</b> 133/19  | <b>symptomatic [1]</b><br>173/2   |
| <b>status [2]</b> 28/23<br>181/10   | <b>status [2]</b> 28/23<br>181/10  | <b>submitting [4]</b> 18/22<br>31/24 104/16 104/18  | <b>suite [4]</b> 105/23<br>106/7 114/5 114/10   |   |
| <b>stay [1]</b> 156/19  | <b>stay [1]</b> 156/19   | <b>subpostmaster [1]</b><br>17/21   |   |   |
| <b>stayed [2]</b> 17/15<br>171/12   | <b>stayed [2]</b> 17/15<br>171/12  | <b>subpostmasters [22]</b><br>22/22 23/12 26/24<br>31/10 80/17 82/6 82/8<br>82/9 82/10 100/11   |   |   |
| <b>steer [1]</b> 75/11  | <b>steer [1]</b> 75/11   |   |   |   |
| <b>stenographer [1]</b><br>152/14   | <b>stenographer [1]</b><br>152/14  |   |   |   |
| <b>step [1]</b> 32/5  | <b>step [1]</b> 32/5   |   |   |   |

|                             |                              |                             |                              |                              |
|-----------------------------|------------------------------|-----------------------------|------------------------------|------------------------------|
| <b>S</b>                    | <b>tale [1]</b> 136/19       | 14/24 25/2 25/6 31/4        | 174/14 175/6 180/12          | 110/16 110/22 112/9          |
| <b>system [61]</b> 9/3 9/15 | <b>talk [3]</b> 117/3 119/25 | 45/1 49/9 51/12 67/10       | 180/17 182/11 189/22         | 112/22 113/8 117/8           |
| 18/12 20/12 22/21           | 130/6                        | 69/10 73/25 75/13           | 190/17 196/18 196/25         | 117/21 119/24 120/25         |
| 23/10 61/11 63/22           | <b>talked [2]</b> 57/19 94/9 | 76/15 77/3 86/16            | 203/5                        | 122/14 123/2 124/5           |
| 74/5 74/9 74/17 80/19       | <b>talking [9]</b> 53/22     | 86/17 86/20 101/20          | <b>theft [1]</b> 8/25        | 125/2 129/7 129/7            |
| 80/20 82/11 82/12           | 60/13 118/3 139/14           | 113/11 113/12 173/13        | <b>their [37]</b> 26/7 26/24 | 129/24 131/19 132/9          |
| 86/13 91/4 91/15            | 174/23 177/24 180/17         | 173/19 180/24 181/7         | 28/17 28/23 33/2             | 134/11 135/17 135/18         |
| 95/12 95/20 95/22           | 180/20 180/22                | 199/19                      | 33/11 33/16 43/10            | 135/25 139/3 141/21          |
| 109/20 121/10 121/13        | <b>tape [2]</b> 102/11       | <b>test [3]</b> 29/8 96/3   | 43/24 44/9 46/9 51/18        | 143/3 143/11 144/2           |
| 123/11 124/24 125/23        | 183/15                       | 97/3                        | 58/4 58/14 59/20             | 145/16 145/16 152/6          |
| 127/11 127/12 127/14        | <b>taped [1]</b> 104/7       | <b>text [3]</b> 107/18      | 70/19 78/1 84/11             | 152/18 153/5 154/20          |
| 128/13 128/19 129/19        | <b>task [4]</b> 10/7 34/8    | 107/19 198/8                | 87/19 105/25 112/19          | 155/8 155/16 155/19          |
| 130/25 131/14 133/23        | 128/15 128/20                | <b>than [31]</b> 10/18 15/5 | 112/19 116/13 129/2          | 163/6 164/25 166/6           |
| 138/6 144/21 145/1          | <b>TC [1]</b> 41/14          | 15/13 23/4 30/19            | 139/7 147/19 162/23          | 170/11 171/20 174/21         |
| 146/1 146/4 146/12          | <b>team [51]</b> 8/16 14/16  | 32/25 34/1 43/3 56/20       | 166/9 170/18 171/2           | 174/23 175/15 176/11         |
| 146/13 147/17 147/19        | 16/3 31/23 39/14             | 57/20 79/3 91/18 92/5       | 171/17 176/8 177/16          | 176/15 181/9 181/14          |
| 148/23 157/2 157/15         | 56/12 69/17 72/25            | 96/13 102/15 105/9          | 191/10 191/15 192/13         | 188/6 188/20 189/6           |
| 162/5 163/2 163/3           | 77/24 103/23 103/24          | 108/24 116/6 117/22         | 195/25                       | 191/12 194/7 196/5           |
| 165/14 165/17 165/20        | 106/12 106/12 107/1          | 143/20 143/22 145/8         | <b>them [65]</b> 15/16       | 197/18                       |
| 166/6 168/1 168/3           | 111/23 114/3 117/16          | 151/3 152/9 163/25          | 22/12 29/2 42/2 44/3         | <b>theoretical [1]</b> 177/4 |
| 168/5 169/19 180/6          | 117/17 118/1 132/5           | 169/21 170/8 175/6          | 53/14 53/23 63/23            | <b>therapy [1]</b> 116/20    |
| 180/7                       | 132/7 135/1 139/4            | 189/4 190/5 190/10          | 66/2 74/14 74/18             | <b>there [161]</b> 2/6 2/18  |
| <b>systematic [1]</b>       | 145/11 150/20 153/3          | <b>thank [43]</b> 1/5 1/6   | 80/19 85/9 85/24             | 3/20 4/6 4/9 4/21 7/5        |
| 125/17                      | 153/13 155/17 157/11         | 1/15 2/2 3/14 3/16 4/4      | 86/18 86/21 87/4 91/2        | 12/14 12/18 14/9             |
| <b>systems [9]</b> 83/21    | 160/5 176/5 176/16           | 5/8 6/4 32/4 39/7           | 92/2 93/7 94/5 94/20         | 16/20 19/10 20/10            |
| 95/23 96/13 124/21          | 178/2 178/6 178/11           | 49/24 64/8 64/10            | 101/8 101/8 101/9            | 22/3 22/4 23/15 24/19        |
| 124/23 136/12 171/11        | 179/21 182/3 186/19          | 64/16 64/17 80/5 92/3       | 102/1 102/2 104/24           | 28/19 29/4 29/5 29/6         |
| 175/11 175/13               | 188/21 188/25 189/20         | 103/20 108/11 110/23        | 107/13 110/6 113/9           | 30/2 31/7 33/11 34/12        |
|                             | 189/22 190/9 190/15          | 119/15 120/4 120/5          | 114/11 114/11 117/23         | 36/16 37/17 38/1 38/2        |
|                             | 191/20 195/23 199/24         | 120/12 120/13 155/9         | 118/17 118/19 119/3          | 38/6 38/19 40/1 41/5         |
|                             | 199/24 202/4 202/9           | 162/14 162/20 164/4         | 119/9 120/1 122/11           | 43/8 44/22 44/22             |
|                             | 202/14                       | 184/14 185/9 185/11         | 123/9 131/5 132/12           | 44/25 44/25 47/25            |
|                             | <b>teams [6]</b> 81/15       | 191/3 195/1 195/6           | 134/24 136/13 137/17         | 48/20 51/6 51/23             |
|                             | 81/18 82/20 117/16           | 200/12 202/20 202/21        | 138/16 138/17 138/19         | 57/23 58/2 58/13 59/1        |
|                             | 155/7 177/13                 | 202/24 202/25 203/5         | 145/12 148/9 148/19          | 59/13 59/24 60/23            |
|                             | <b>technical [8]</b> 34/15   | 203/9                       | 148/19 152/15 159/16         | 62/24 65/9 66/11             |
|                             | 128/18 157/23 198/22         | <b>Thanks [5]</b> 47/14     | 159/23 161/9 161/11          | 67/22 70/2 71/23             |
|                             | 198/24 199/3 201/8           | 130/2 142/23 145/20         | 170/17 177/5 179/19          | 72/17 73/16 74/12            |
|                             | 201/15                       | 164/16                      | 186/11 186/14 193/8          | 75/5 75/25 77/12             |
|                             | <b>technically [7]</b> 34/23 | <b>that [933]</b>           | 194/4                        | 80/20 81/21 85/14            |
|                             | 38/17 38/22 47/11            | <b>that I [5]</b> 6/23 24/9 | <b>theme [2]</b> 187/5       | 85/18 88/24 89/1             |
|                             | 49/11 50/1 55/6              | 89/18 169/12 179/11         | 197/15                       | 89/10 89/20 91/10            |
|                             | <b>telephone [12]</b> 32/25  | <b>that's [81]</b> 4/12 8/4 | <b>themselves [4]</b> 129/1  | 92/3 92/12 92/13             |
|                             | 33/3 41/14 78/25 79/4        | 13/6 26/10 29/24            | 131/3 165/19 178/15          | 92/25 93/5 93/9 94/10        |
|                             | 95/3 97/7 97/8 98/24         | 31/14 35/8 35/11            | <b>then [121]</b> 3/14 11/24 | 96/15 102/1 104/5            |
|                             | 160/6 198/9 200/12           | 35/19 36/4 36/5 36/22       | 12/8 12/11 14/14             | 104/11 104/14 105/11         |
|                             | <b>tell [24]</b> 1/12 1/21   | 40/6 41/7 43/5 49/6         | 14/21 15/7 16/21 17/2        | 105/14 109/7 110/2           |
|                             | 2/14 2/22 3/9 5/11           | 49/11 53/2 54/9 54/16       | 17/12 20/7 36/1 36/6         | 110/13 111/5 114/8           |
|                             | 5/22 7/2 7/3 7/17 7/17       | 55/19 57/21 58/8            | 36/16 37/1 37/21             | 117/18 118/5 119/23          |
|                             | 12/1 13/3 33/4 34/6          | 60/11 61/25 64/5            | 38/10 38/11 38/16            | 121/7 121/9 121/11           |
|                             | 40/12 77/20 119/1            | 64/22 65/18 66/3            | 38/16 38/21 46/15            | 122/1 122/12 122/17          |
|                             | 121/24 123/21 174/16         | 67/10 67/25 68/7            | 46/22 47/10 47/11            | 122/19 123/15 124/7          |
|                             | 174/17 174/20 176/2          | 68/21 69/1 70/4 71/22       | 48/23 48/23 49/11            | 125/16 126/1 127/11          |
|                             | <b>telling [9]</b> 42/13     | 73/25 76/6 76/17 77/8       | 50/1 52/19 53/17             | 128/12 130/14 130/21         |
|                             | 45/10 50/2 63/9 76/14        | 78/19 79/2 79/18 81/2       | 54/17 55/6 57/14 58/5        | 131/14 132/11 132/15         |
|                             | 76/19 114/11 114/20          | 93/7 101/11 101/11          | 61/25 63/4 67/8 69/17        | 133/2 134/16 134/22          |
|                             | 186/18                       | 105/21 106/18 108/23        | 69/22 71/21 73/6             | 140/25 141/18 142/16         |
|                             | <b>tells [1]</b> 20/23       | 112/4 115/6 118/19          | 73/16 76/22 77/6 77/8        | 145/16 146/11 147/9          |
|                             | <b>temporary [1]</b> 10/17   | 118/20 118/24 120/2         | 80/14 83/11 86/19            | 148/5 148/17 152/6           |
|                             | <b>ten [1]</b> 176/11        | 131/6 131/9 142/3           | 87/6 87/7 88/5 90/5          | 153/3 153/8 153/22           |
|                             | <b>Tend [2]</b> 99/11 99/13  | 144/8 146/14 147/24         | 90/8 90/9 99/2 99/4          | 155/18 157/9 157/13          |
|                             | <b>tenure [4]</b> 113/15     | 150/14 154/11 162/4         | 104/8 104/9 104/14           | 157/19 158/5 159/25          |
|                             | 115/4 132/18 132/19          | 162/9 166/7 166/21          | 106/14 107/14 107/25         | 160/4 161/1 161/13           |
|                             | <b>terms [26]</b> 6/24 14/9  | 166/21 169/17 172/24        | 108/6 108/8 108/10           | 161/14 161/25 162/6          |

|          |   |   |  |  |
|----------|---|---|--|--|
| <b>T</b> | 105/25 107/11 110/1<br>110/6 112/22 113/17<br>113/18 113/19 113/20<br>114/20 114/21 114/22<br>115/19 115/24 118/14<br>118/22 119/1 119/10<br>129/2 131/3 132/5<br>133/4 133/23 135/4<br>135/7 135/9 135/9<br>137/24 138/19 146/21<br>146/24 148/6 156/6<br>156/7 164/20 165/15<br>170/21 177/7 177/21<br>178/12 178/23 178/24<br>179/9 180/22 185/4<br>185/5 190/10 199/4<br>199/6 199/7 200/3<br>201/9 | 180/16 183/21 184/9<br>185/2 186/3 187/1<br>188/3 195/2 196/10<br>201/13<br><b>thinking [2]</b> 65/16<br>146/8<br><b>third [5]</b> 40/15 52/11<br>84/9 142/20 175/10<br><b>Thirdly [1]</b> 62/4<br><b>this [276]</b><br><b>those [49]</b> 10/23 11/2<br>15/14 18/18 19/7<br>23/22 25/17 26/20<br>27/3 28/3 28/21 29/1<br>29/7 31/11 37/6 50/21<br>52/1 52/20 53/25 54/1<br>62/12 72/18 72/19<br>74/13 82/4 88/12<br>88/13 94/20 95/21<br>96/16 96/18 96/20<br>96/21 96/23 97/25<br>98/21 109/23 117/10<br>135/21 143/20 159/3<br>170/24 175/22 176/21<br>183/23 184/3 191/15<br>191/21 202/20 | 124/22 130/16 130/20<br>132/20 132/22 132/24<br>134/15 137/8 140/25<br>142/15 144/22 145/20<br>146/10 147/11 147/24<br>148/16 149/18 151/9<br>160/22 164/16 165/10<br>166/1 173/7 182/14<br>185/17 186/7 187/5<br>188/9 202/4<br><b>times [4]</b> 13/1 60/4<br>100/22 103/6<br><b>titled [1]</b> 80/13<br><b>today [5]</b> 3/4 144/5<br>150/3 195/17 195/22<br><b>together [9]</b> 23/6<br>83/2 94/6 102/1<br>110/10 117/16 130/9<br>142/5 164/23<br><b>told [28]</b> 24/24 25/1<br>25/4 27/7 29/20 29/21<br>29/22 30/2 30/3 30/6<br>30/7 30/11 35/20<br>40/12 43/19 56/8<br>56/25 61/22 62/1 62/4<br>89/10 113/17 132/12<br>165/13 166/6 173/18<br>175/7 178/10<br><b>Tom [2]</b> 197/22<br>200/11<br><b>tomorrow [2]</b> 91/7<br>164/20<br><b>Tony [2]</b> 11/17 176/4<br><b>too [7]</b> 18/19 67/18<br>77/3 190/19 192/11<br>193/3 193/18<br><b>took [11]</b> 11/17 12/3<br>12/8 12/12 12/17<br>14/23 15/14 41/2<br>158/2 189/20 191/24<br><b>top [5]</b> 41/9 121/1<br>126/21 155/8 198/3<br><b>topic [6]</b> 21/1 21/5<br>119/16 120/15 174/11<br>184/13<br><b>topics [1]</b> 23/13<br><b>total [4]</b> 157/7 188/22<br>189/12 189/25<br><b>towards [3]</b> 20/20<br>117/14 182/10<br><b>trace [4]</b> 62/22 63/17<br>63/22 68/12<br><b>traces [1]</b> 70/25<br><b>tracked [1]</b> 56/22<br><b>tracking [1]</b> 140/25<br><b>tracks [1]</b> 160/20<br><b>trail [1]</b> 90/4<br><b>train [1]</b> 160/19<br><b>trained [2]</b> 6/10<br>95/22<br><b>training [12]</b> 10/25<br>11/2 11/4 11/6 15/17<br>56/13 80/18 82/9 94/1<br>96/13 99/17 187/24 | <b>transaction [3]</b><br>128/12 139/14 198/18<br><b>transcript [2]</b> 4/4<br>13/22<br><b>translated [1]</b> 50/25<br><b>travel [1]</b> 175/19<br><b>travelled [1]</b> 179/7<br><b>trial [3]</b> 196/2 197/2<br>197/2<br><b>tried [1]</b> 202/12<br><b>trigger [1]</b> 197/5<br><b>triggered [1]</b> 181/4<br><b>trouble [1]</b> 158/8<br><b>true [4]</b> 4/1 4/18<br>47/13 169/17<br><b>truth [1]</b> 146/23<br><b>try [3]</b> 84/16 94/23<br>129/11<br><b>trying [6]</b> 8/14 58/3<br>58/13 158/17 160/14<br>160/15<br><b>turn [21]</b> 3/19 20/18<br>20/21 60/2 62/12<br>69/14 78/2 78/23<br>87/12 93/19 103/9<br>110/16 114/4 120/14<br>141/21 149/4 163/13<br>174/11 174/13 184/13<br>191/6<br><b>turned [1]</b> 89/16<br><b>TV [1]</b> 124/16<br><b>tweaks [1]</b> 94/10<br><b>twice [1]</b> 22/3<br><b>two [18]</b> 1/17 12/5<br>12/25 43/19 96/16<br>117/15 125/6 139/17<br>143/13 150/25 151/11<br>159/3 160/22 193/23<br>194/12 197/21 198/5<br>198/10<br><b>two paragraphs [1]</b><br>96/16<br><b>two-page [1]</b> 197/21<br><b>twofold [1]</b> 19/21<br><b>type [3]</b> 15/2 133/10<br>152/15<br><b>type' [1]</b> 115/6<br><b>typed [9]</b> 41/18 42/14<br>42/16 45/11 52/6<br>52/18 54/3 54/22<br>90/19<br><b>typed-up [1]</b> 52/6<br><b>types [1]</b> 116/17<br><b>typewritten [7]</b> 43/7<br>43/14 44/1 44/12 45/4<br>45/20 45/25<br><b>typos [1]</b> 57/9 |
|          | 105/25 107/11 110/1<br>110/6 112/22 113/17<br>113/18 113/19 113/20<br>114/20 114/21 114/22<br>115/19 115/24 118/14<br>118/22 119/1 119/10<br>129/2 131/3 132/5<br>133/4 133/23 135/4<br>135/7 135/9 135/9<br>137/24 138/19 146/21<br>146/24 148/6 156/6<br>156/7 164/20 165/15<br>170/21 177/7 177/21<br>178/12 178/23 178/24<br>179/9 180/22 185/4<br>185/5 190/10 199/4<br>199/6 199/7 200/3<br>201/9 | 180/16 183/21 184/9<br>185/2 186/3 187/1<br>188/3 195/2 196/10<br>201/13<br><b>thinking [2]</b> 65/16<br>146/8<br><b>third [5]</b> 40/15 52/11<br>84/9 142/20 175/10<br><b>Thirdly [1]</b> 62/4<br><b>this [276]</b><br><b>those [49]</b> 10/23 11/2<br>15/14 18/18 19/7<br>23/22 25/17 26/20<br>27/3 28/3 28/21 29/1<br>29/7 31/11 37/6 50/21<br>52/1 52/20 53/25 54/1<br>62/12 72/18 72/19<br>74/13 82/4 88/12<br>88/13 94/20 95/21<br>96/16 96/18 96/20<br>96/21 96/23 97/25<br>98/21 109/23 117/10<br>135/21 143/20 159/3<br>170/24 175/22 176/21<br>183/23 184/3 191/15<br>191/21 202/20 | 124/22 130/16 130/20<br>132/20 132/22 132/24<br>134/15 137/8 140/25<br>142/15 144/22 145/20<br>146/10 147/11 147/24<br>148/16 149/18 151/9<br>160/22 164/16 165/10<br>166/1 173/7 182/14<br>185/17 186/7 187/5<br>188/9 202/4<br><b>times [4]</b> 13/1 60/4<br>100/22 103/6<br><b>titled [1]</b> 80/13<br><b>today [5]</b> 3/4 144/5<br>150/3 195/17 195/22<br><b>together [9]</b> 23/6<br>83/2 94/6 102/1<br>110/10 117/16 130/9<br>142/5 164/23<br><b>told [28]</b> 24/24 25/1<br>25/4 27/7 29/20 29/21<br>29/22 30/2 30/3 30/6<br>30/7 30/11 35/20<br>40/12 43/19 56/8<br>56/25 61/22 62/1 62/4<br>89/10 113/17 132/12<br>165/13 166/6 173/18<br>175/7 178/10<br><b>Tom [2]</b> 197/22<br>200/11<br><b>tomorrow [2]</b> 91/7<br>164/20<br><b>Tony [2]</b> 11/17 176/4<br><b>too [7]</b> 18/19 67/18<br>77/3 190/19 192/11<br>193/3 193/18<br><b>took [11]</b> 11/17 12/3<br>12/8 12/12 12/17<br>14/23 15/14 41/2<br>158/2 189/20 191/24<br><b>top [5]</b> 41/9 121/1<br>126/21 155/8 198/3<br><b>topic [6]</b> 21/1 21/5<br>119/16 120/15 174/11<br>184/13<br><b>topics [1]</b> 23/13<br><b>total [4]</b> 157/7 188/22<br>189/12 189/25<br><b>towards [3]</b> 20/20<br>117/14 182/10<br><b>trace [4]</b> 62/22 63/17<br>63/22 68/12<br><b>traces [1]</b> 70/25<br><b>tracked [1]</b> 56/22<br><b>tracking [1]</b> 140/25<br><b>tracks [1]</b> 160/20<br><b>trail [1]</b> 90/4<br><b>train [1]</b> 160/19<br><b>trained [2]</b> 6/10<br>95/22<br><b>training [12]</b> 10/25<br>11/2 11/4 11/6 15/17<br>56/13 80/18 82/9 94/1<br>96/13 99/17 187/24 | <b>transaction [3]</b><br>128/12 139/14 198/18<br><b>transcript [2]</b> 4/4<br>13/22<br><b>translated [1]</b> 50/25<br><b>travel [1]</b> 175/19<br><b>travelled [1]</b> 179/7<br><b>trial [3]</b> 196/2 197/2<br>197/2<br><b>tried [1]</b> 202/12<br><b>trigger [1]</b> 197/5<br><b>triggered [1]</b> 181/4<br><b>trouble [1]</b> 158/8<br><b>true [4]</b> 4/1 4/18<br>47/13 169/17<br><b>truth [1]</b> 146/23<br><b>try [3]</b> 84/16 94/23<br>129/11<br><b>trying [6]</b> 8/14 58/3<br>58/13 158/17 160/14<br>160/15<br><b>turn [21]</b> 3/19 20/18<br>20/21 60/2 62/12<br>69/14 78/2 78/23<br>87/12 93/19 103/9<br>110/16 114/4 120/14<br>141/21 149/4 163/13<br>174/11 174/13 184/13<br>191/6<br><b>turned [1]</b> 89/16<br><b>TV [1]</b> 124/16<br><b>tweaks [1]</b> 94/10<br><b>twice [1]</b> 22/3<br><b>two [18]</b> 1/17 12/5<br>12/25 43/19 96/16<br>117/15 125/6 139/17<br>143/13 150/25 151/11<br>159/3 160/22 193/23<br>194/12 197/21 198/5<br>198/10<br><b>two paragraphs [1]</b><br>96/16<br><b>two-page [1]</b> 197/21<br><b>twofold [1]</b> 19/21<br><b>type [3]</b> 15/2 133/10<br>152/15<br><b>type' [1]</b> 115/6<br><b>typed [9]</b> 41/18 42/14<br>42/16 45/11 52/6<br>52/18 54/3 54/22<br>90/19<br><b>typed-up [1]</b> 52/6<br><b>types [1]</b> 116/17<br><b>typewritten [7]</b> 43/7<br>43/14 44/1 44/12 45/4<br>45/20 45/25<br><b>typos [1]</b> 57/9 |
|          | 105/25 107/11 110/1<br>110/6 112/22 113/17<br>113/18 113/19 113/20<br>114/20 114/21 114/22<br>115/19 115/24 118/14<br>118/22 119/1 119/10<br>129/2 131/3 132/5<br>133/4 133/23 135/4<br>135/7 135/9 135/9<br>137/24 138/19 146/21<br>146/24 148/6 156/6<br>156/7 164/20 165/15<br>170/21 177/7 177/21<br>178/12 178/23 178/24<br>179/9 180/22 185/4<br>185/5 190/10 199/4<br>199/6 199/7 200/3<br>201/9 | 180/16 183/21 184/9<br>185/2 186/3 187/1<br>188/3 195/2 196/10<br>201/13<br><b>thinking [2]</b> 65/16<br>146/8<br><b>third [5]</b> 40/15 52/11<br>84/9 142/20 175/10<br><b>Thirdly [1]</b> 62/4<br><b>this [276]</b><br><b>those [49]</b> 10/23 11/2<br>15/14 18/18 19/7<br>23/22 25/17 26/20<br>27/3 28/3 28/21 29/1<br>29/7 31/11 37/6 50/21<br>52/1 52/20 53/25 54/1<br>62/12 72/18 72/19<br>74/13 82/4 88/12<br>88/13 94/20 95/21<br>96/16 96/18 96/20<br>96/21 96/23 97/25<br>98/21 109/23 117/10<br>135/21 143/20 159/3<br>170/24 175/22 176/21<br>183/23 184/3 191/15<br>191/21 202/20 | 124/22 130/16 130/20<br>132/20 132/22 132/24<br>134/15 137/8 140/25<br>142/15 144/22 145/20<br>146/10 147/11 147/24<br>148/16 149/18 151/9<br>160/22 164/16 165/10<br>166/1 173/7 182/14<br>185/17 186/7 187/5<br>188/9 202/4<br><b>times [4]</b> 13/1 60/4<br>100/22 103/6<br><b>titled [1]</b> 80/13<br><b>today [5]</b> 3/4 144/5<br>150/3 195/17 195/22<br><b>together [9]</b> 23/6<br>83/2 94/6 102/1<br>110/10 117/16 130/9<br>142/5 164/23<br><b>told [28]</b> 24/24 25/1<br>25/4 27/7 29/20 29/21<br>29/22 30/2 30/3 30/6<br>30/7 30/11 35/20<br>40/12 43/19 56/8<br>56/25 61/22 62/1 62/4<br>89/10 113/17 132/12<br>165/13 166/6 173/18<br>175/7 178/10<br><b>Tom [2]</b> 197/22<br>200/11<br><b>tomorrow [2]</b> 91/7<br>164/20<br><b>Tony [2]</b> 11/17 176/4<br><b>too [7]</b> 18/19 67/18<br>77/3 190/19 192/11<br>193/3 193/18<br><b>took [11]</b> 11/17 12/3<br>12/8 12/12 12/17<br>14/23 15/14 41/2<br>158/2 189/20 191/24<br><b>top [5]</b> 41/9 121/1<br>126/21 155/8 198/3<br><b>topic [6]</b> 21/1 21/5<br>119/16 120/15 174/11<br>184/13<br><b>topics [1]</b> 23/13<br><b>total [4]</b> 157/7 188/22<br>189/12 189/25<br><b>towards [3]</b> 20/20<br>117/14 182/10<br><b>trace [4]</b> 62/22 63/17<br>63/22 68/12<br><b>traces [1]</b> 70/25<br><b>tracked [1]</b> 56/22<br><b>tracking [1]</b> 140/25<br><b>tracks [1]</b> 160/20<br><b>trail [1]</b> 90/4<br><b>train [1]</b> 160/19<br><b>trained [2]</b> 6/10<br>95/22<br><b>training [12]</b> 10/25<br>11/2 11/4 11/6 15/17<br>56/13 80/18 82/9 94/1<br>96/13 99/17 187/24 | <b>transaction [3]</b><br>128/12 139/14 198/18<br><b>transcript [2]</b> 4/4<br>13/22<br><b>translated [1]</b> 50/25<br><b>travel [1]</b> 175/19<br><b>travelled [1]</b> 179/7<br><b>trial [3]</b> 196/2 197/2<br>197/2<br><b>tried [1]</b> 202/12<br><b>trigger [1]</b> 197/5<br><b>triggered [1]</b> 181/4<br><b>trouble [1]</b> 158/8<br><b>true [4]</b> 4/1 4/18<br>47/13 169/17<br><b>truth [1]</b> 146/23<br><b>try [3]</b> 84/16 94/23<br>129/11<br><b>trying [6]</b> 8/14 58/3<br>58/13 158/17 160/14<br>160/15<br><b>turn [21]</b> 3/19 20/18<br>20/21 60/2 62/12<br>69/14 78/2 78/23<br>87/12 93/19 103/9<br>110/16 114/4 120/14<br>141/21 149/4 163/13<br>174/11 174/13 184/13<br>191/6<br><b>turned [1]</b> 89/16<br><b>TV [1]</b> 124/16<br><b>tweaks [1]</b> 94/10<br><b>twice [1]</b> 22/3<br><b>two [18]</b> 1/17 12/5<br>12/25 43/19 96/16<br>117/15 125/6 139/17<br>143/13 150/25 151/11<br>159/3 160/22 193/23<br>194/12 197/21 198/5<br>198/10<br><b>two paragraphs [1]</b><br>96/16<br><b>two-page [1]</b> 197/21<br><b>twofold [1]</b> 19/21<br><b>type [3]</b> 15/2 133/10<br>152/15<br><b>type' [1]</b> 115/6<br><b>typed [9]</b> 41/18 42/14<br>42/16 45/11 52/6<br>52/18 54/3 54/22<br>90/19<br><b>typed-up [1]</b> 52/6<br><b>types [1]</b> 116/17<br><b>typewritten [7]</b> 43/7<br>43/14 44/1 44/12 45/4<br>45/20 45/25<br><b>typos [1]</b> 57/9 |
|          | 105/25 107/11 110/1<br>110/6 112/22 113/17<br>113/18 113/19 113/20<br>114/20 114/21 114/22<br>115/19 115/24 118/14<br>118/22 119/1 119/10<br>129/2 131/3 132/5<br>133/4 133/23 135/4<br>135/7 135/9 135/9<br>137/24 138/19 146/21<br>146/24 148/6 156/6<br>156/7 164/20 165/15<br>170/21 177/7 177/21<br>178/12 178/23 178/24<br>179/9 180/22 185/4<br>185/5 190/10 199/4<br>199/6 199/7 200/3<br>201/9 | 180/16 183/21 184/9<br>185/2 186/3 187/1<br>188/3 195/2 196/10<br>201/13<br><b>thinking [2]</b> 65/16<br>146/8<br><b>third [5]</b> 40/15 52/11<br>84/9 142/20 175/10<br><b>Thirdly [1]</b> 62/4<br><b>this [276]</b><br><b>those [49]</b> 10/23 11/2<br>15/14 18/18 19/7<br>23/22 25/17 26/20<br>27/3 28/3 28/21 29/1<br>29/7 31/11 37/6 50/21<br>52/1 52/20 53/25 54/1<br>62/12 72/18 72/19<br>74/13 82/4 88/12<br>88/13 94/20 95/21<br>96/16 96/18 96/20<br>96/21 96/23 97/25<br>98/21 109/23 117/10<br>135/21 143/20 159/3<br>170/24 175/22 176/21<br>183/23 184/3 191/15<br>191/21 202/20 | 124/22 130/16 130/20<br>132/20 132/22 132/24<br>134/15 137/8 140/25<br>142/15 144/22 145/20<br>146/10 147/11 147/24<br>148/16 149/18 151/9<br>160/22 164/16 165/10<br>166/1 173/7 182/14<br>185/17 186/7 187/5<br>188/9 202/4<br><b>times [4]</b> 13/1 60/4<br>100/22 103/6<br><b>titled [1]</b> 80/13<br><b>today [5]</b> 3/4 144/5<br>150/3 195/17 195/22<br><b>together [9]</b> 23/6<br>83/2 94/6 102/1<br>110/10 117/16 130/9<br>142/5 164/23<br><b>told [28]</b> 24/24 25/1<br>25/4 27/7 29/20 29/21<br>29/22 30/2 30/3 30/6<br>30/7 30/11 35/20<br>40/12 43/19 56/8<br>56/25 61/22 62/1 62/4<br>89/10 113/17 132/12<br>165/13 166/6 173/18<br>175/7 178/10<br><b>Tom [2]</b> 197/22<br>200/11<br><b>tomorrow [2]</b> 91/7<br>164/20<br><b>Tony [2]</b> 11/17 176/4<br><b>too [7]</b> 18/19 67/18<br>77/3 190/19 192/11<br>193/3 193/18<br><b>took [11]</b> 11/17 12/3<br>12/8 12/12 12/17<br>14/23 15/14 41/2<br>158/2 189/20 191/24<br><b>top [5]</b> 41/9 121/1<br>126/21 155/8 198/3<br><b>topic [6]</b> 21/1 21/5<br>119/16 120/15 174/11<br>184/13<br><b>topics [1]</b> 23/13<br><b>total [4]</b> 157/7 188/22<br>189/12 189/25<br><b>towards [3]</b> 20/20<br>117/14 182/10<br><b>trace [4]</b> 62/22 63/17<br>63/22 68/12<br><b>traces [1]</b> 70/25<br><b>tracked [1]</b> 56/22<br><b>tracking [1]</b> 140/25<br><b>tracks [1]</b> 160/20<br><b>trail [1]</b> 90/4<br><b>train [1]</b> 160/19<br><b>trained [2]</b> 6/10<br>95/22<br><b>training [12]</b> 10/25<br>11/2 11/4 11/6 15/17<br>56/13 80/18 82/9 94/1<br>96/13 99/17 187/24 | <b>transaction [3]</b><br>128/12 139/14 198/18<br><b>transcript [2]</b> 4/4<br>13/22<br><b>translated [1]</b> 50/25<br><b>travel [1]</b> 175/19<br><b>travelled [1]</b> 179/7<br><b>trial [3]</b> 196/2 197/2<br>197/2<br><b>tried [1]</b> 202/12<br><b>trigger [1]</b> 197/5<br><b>triggered [1]</b> 181/4<br><b>trouble [1]</b> 158/8<br><b>true [4]</b> 4/1 4/18<br>47/13 169/17<br><b>truth [1]</b> 146/23<br><b>try [3]</b> 84/16 94/23<br>129/11<br><b>trying [6]</b> 8/14 58/3<br>58/13 158/17 160/14<br>160/15<br><b>turn [21]</b> 3/19 20/18<br>20/21 60/2 62/12<br>69/14 78/2 78/23<br>87/12 93/19 103/9<br>110/16 114/4 120/14<br>141/21 149/4 163/13<br>174/11 174/13 184/13<br>191/6<br><b>turned [1]</b> 89/16<br><b>TV [1]</b> 124/16<br><b>tweaks [1]</b> 94/10<br><b>twice [1]</b> 22/3<br><b>two [18]</b> 1/17 12/5<br>12/25 43/19 96/16<br>117/15 125/6 139/17<br>143/13 150/25 151/11<br>159/3 160/22 193/23<br>194/12 197/21 198/5<br>198/10<br><b>two paragraphs [1]</b><br>96/16<br><b>two-page [1]</b> 197/21<br><b>twofold [1]</b> 19/21<br><b>type [3]</b> 15/2 133/10<br>152/15<br><b>type' [1]</b> 115/6<br><b>typed [9]</b> 41/18 42/14<br>42/16 45/11 52/6<br>52/18 54/3 54/22<br>90/19<br><b>typed-up [1]</b> 52/6<br><b>types [1]</b> 116/17<br><b>typewritten [7]</b> 43/7<br>43/14 44/1 44/12 45/4<br>45/20 45/25<br><b>typos [1]</b> 57/9 |



|   |  |  |   |  |
|---|--|--|---|--|
| <p><b>U</b></p> <p><b>unclear... [1]</b> 60/22</p> <p><b>unconnected [1]</b> 20/16</p> <p><b>uncover [1]</b> 171/24</p> <p><b>under [36]</b> 5/9 5/10 6/10 27/3 29/3 32/23 36/16 41/13 61/8 61/20 62/16 62/20 63/13 63/15 64/20 73/8 73/10 73/12 73/23 74/14 74/18 75/2 76/16 78/6 83/11 90/21 95/8 95/14 103/24 108/7 113/14 139/2 140/24 176/21 177/5 188/23</p> <p><b>underlying [3]</b> 102/13 102/15 183/6</p> <p><b>undermine [1]</b> 95/17</p> <p><b>undermined [2]</b> 27/25 173/22</p> <p><b>undermines [1]</b> 27/21</p> <p><b>undermining [2]</b> 109/24 156/12</p> <p><b>underneath [3]</b> 107/20 135/2 192/18</p> <p><b>understand [23]</b> 3/11 8/5 16/25 26/6 34/17 36/8 37/8 38/18 41/8 47/16 49/17 51/18 52/11 85/16 102/24 128/9 129/17 139/1 140/23 148/13 170/3 171/16 201/10</p> <p><b>understanding [12]</b> 10/8 39/17 72/17 79/7 83/8 91/10 130/15 137/8 144/9 155/24 183/2 184/21</p> <p><b>understands [1]</b> 189/2</p> <p><b>understood [2]</b> 124/13 178/12</p> <p><b>undertake [1]</b> 136/13</p> <p><b>undertaken [4]</b> 59/8 105/12 115/14 183/25</p> <p><b>underwent [1]</b> 133/25</p> <p><b>undetected [1]</b> 62/21</p> <p><b>Unfortunately [1]</b> 125/10</p> <p><b>uniform [1]</b> 6/6</p> <p><b>informed [1]</b> 6/4</p> <p><b>units [1]</b> 12/21</p> <p><b>university [1]</b> 19/14</p> <p><b>unless [2]</b> 75/11 194/19</p> <p><b>unlikely [2]</b> 54/14 54/15</p> <p><b>unreliable [4]</b> 99/12 99/14 142/10 166/21</p> | <p><b>unsafe [1]</b> 29/16</p> <p><b>unsound [1]</b> 161/16</p> <p><b>until [17]</b> 11/8 11/8 14/4 17/16 22/9 41/1 64/7 76/3 77/14 82/22 110/22 118/6 119/17 160/7 160/19 191/1 203/11</p> <p><b>untold [1]</b> 157/2</p> <p><b>up [79]</b> 5/7 6/18 10/20 11/8 14/4 15/7 19/17 22/9 25/7 32/8 34/21 49/1 52/6 54/21 57/14 59/9 60/18 61/3 63/18 69/15 80/22 85/25 86/23 89/17 90/9 90/22 92/13 94/5 94/18 96/13 99/19 103/23 108/11 110/14 118/6 119/16 120/25 121/23 121/25 123/18 124/18 129/10 129/24 131/24 132/16 132/20 133/14 134/1 135/12 135/17 135/25 139/17 143/11 144/13 145/17 147/17 149/6 152/13 154/18 155/8 160/19 161/11 163/19 166/10 174/13 174/24 177/10 179/2 179/14 187/14 188/11 191/6 191/24 192/23 195/13 198/3 198/23 200/9 200/21</p> <p><b>updated [2]</b> 168/16 169/16</p> <p><b>updates [2]</b> 155/3 179/22</p> <p><b>upgraded [1]</b> 168/17</p> <p><b>upheld [1]</b> 3/2</p> <p><b>upon [9]</b> 2/17 2/25 28/5 28/12 85/16 163/5 163/9 163/11 184/25</p> <p><b>URN [2]</b> 4/5 4/21</p> <p><b>us [42]</b> 1/12 5/11 5/22 7/2 7/3 7/17 7/17 12/1 13/3 20/23 21/19 33/4 34/6 43/19 50/2 58/18 63/9 77/5 77/20 80/3 93/16 123/22 128/1 130/6 130/13 138/24 143/22 146/2 149/13 150/9 153/18 156/3 161/23 169/13 174/16 174/17 174/20 175/7 176/2 195/11 199/10 199/13</p> <p><b>use [11]</b> 10/25 26/18 27/2 43/2 48/24 84/8 84/19 114/12 114/21 138/19 187/10</p> <p><b>used [10]</b> 18/8 20/13 30/4 42/23 49/1 49/21</p> | <p>63/13 89/1 182/25 200/17</p> <p><b>useful [5]</b> 91/6 91/21 123/22 128/8 130/10</p> <p><b>users [3]</b> 95/24 96/21 96/23</p> <p><b>uses [1]</b> 27/13</p> <p><b>using [7]</b> 64/4 65/20 72/14 80/19 82/11 95/21 115/9</p> <p><b>usual [1]</b> 90/17</p> <p><b>V</b></p> <p><b>value [2]</b> 164/18 170/1</p> <p><b>values [3]</b> 20/24 147/21 165/25</p> <p><b>van [1]</b> 80/10</p> <p><b>varied [1]</b> 185/4</p> <p><b>various [5]</b> 8/16 124/15 162/22 175/20 189/10</p> <p><b>variously [1]</b> 104/6</p> <p><b>vast [1]</b> 6/6</p> <p><b>Vella [1]</b> 123/18</p> <p><b>Vennells [1]</b> 185/13</p> <p><b>veracity [1]</b> 157/10</p> <p><b>verbal [3]</b> 69/5 152/10 152/11</p> <p><b>verballed [1]</b> 192/23</p> <p><b>verbatim [1]</b> 55/2</p> <p><b>verification [1]</b> 151/19</p> <p><b>versed [2]</b> 178/12 178/23</p> <p><b>version [2]</b> 44/12 164/7</p> <p><b>versions [1]</b> 52/6</p> <p><b>very [49]</b> 1/6 1/15 1/18 3/14 3/16 6/4 6/6 7/8 10/10 10/14 10/18 10/21 10/23 14/17 14/19 15/18 24/9 38/3 42/1 45/1 51/9 54/14 56/2 60/19 60/25 64/8 64/17 83/12 83/18 85/4 86/11 105/19 105/24 113/13 114/14 114/14 120/13 124/20 125/13 128/13 133/25 162/13 162/14 187/12 191/3 195/1 202/4 203/5 203/9</p> <p><b>via [1]</b> 131/23</p> <p><b>view [3]</b> 38/23 125/7 146/2</p> <p><b>views [1]</b> 102/16</p> <p><b>vindicate [1]</b> 156/23</p> <p><b>virus [1]</b> 99/10</p> <p><b>voice [1]</b> 10/20</p> <p><b>voice up [1]</b> 10/20</p> <p><b>volition [1]</b> 4/9</p> <p><b>volume [1]</b> 8/10</p> | <p><b>W</b></p> <p><b>waiving [1]</b> 84/24</p> <p><b>want [26]</b> 20/22 44/20 45/4 54/13 54/14 55/21 61/13 63/3 66/8 66/17 66/23 67/4 67/19 68/3 68/21 73/23 76/21 94/23 119/23 119/25 146/12 146/17 161/4 165/7 188/11 194/11</p> <p><b>wanted [14]</b> 14/19 15/3 15/18 15/22 36/14 44/23 48/23 55/16 68/24 69/11 74/1 74/1 74/3 159/2</p> <p><b>wants [1]</b> 122/17</p> <p><b>warning [5]</b> 1/20 40/6 41/5 172/21 199/11</p> <p><b>was [401]</b></p> <p><b>was/is [1]</b> 142/9</p> <p><b>wasn't [22]</b> 10/22 13/25 14/1 18/18 22/3 41/21 50/25 51/23 69/18 72/24 73/1 92/12 116/10 121/16 147/9 148/3 148/25 154/14 158/12 159/19 172/19 193/10</p> <p><b>watch [2]</b> 113/24 114/20</p> <p><b>watching [1]</b> 196/20</p> <p><b>way [34]</b> 13/4 24/24 27/3 29/3 33/10 38/19 42/4 42/18 42/19 43/3 43/3 62/6 63/24 74/18 84/17 103/12 123/15 127/18 128/4 135/7 138/24 139/2 140/24 141/11 145/24 146/5 146/16 146/21 153/1 154/11 156/5 177/3 177/20 190/19</p> <p><b>we [292]</b></p> <p><b>we'd [4]</b> 14/25 15/16 89/7 158/5</p> <p><b>we'll [6]</b> 26/9 107/24 107/25 126/21 155/9 158/7</p> <p><b>we're [25]</b> 1/17 13/15 21/6 35/13 58/1 59/25 105/18 105/19 108/22 118/15 118/16 119/1 120/19 121/17 137/6 144/18 145/4 146/10 146/19 147/8 159/9 165/4 167/25 168/2 177/24</p> <p><b>we've [25]</b> 13/22 21/8 43/7 43/15 44/1 44/2 44/13 56/24 60/12 76/5 81/20 93/10 93/13 93/15 104/2</p> | <p>115/4 118/4 124/1 137/1 137/16 160/16 161/8 162/21 173/4 184/1</p> <p><b>weak [1]</b> 170/9</p> <p><b>weaknesses [1]</b> 113/8</p> <p><b>websites [1]</b> 123/19</p> <p><b>Wednesday [10]</b> 1/1 26/3 51/15 52/12 60/11 60/14 95/3 97/7 97/9 98/24</p> <p><b>Wednesdays [1]</b> 86/5</p> <p><b>week [2]</b> 16/3 94/9</p> <p><b>week's [1]</b> 94/4</p> <p><b>weekly [10]</b> 25/7 25/11 25/22 32/10 50/10 55/14 55/16 90/23 101/7 122/3</p> <p><b>weigh [1]</b> 161/11</p> <p><b>weighting [1]</b> 104/24</p> <p><b>weird [1]</b> 138/21</p> <p><b>well [47]</b> 12/4 12/12 22/16 29/16 30/24 45/22 49/12 52/3 61/22 77/5 77/17 81/8 88/10 92/15 105/9 105/19 105/19 111/20 118/19 125/12 126/15 132/22 144/9 146/23 153/18 155/5 162/13 169/23 172/17 176/5 176/7 178/12 178/23 179/4 180/5 181/13 182/20 187/3 192/6 193/17 193/25 196/3 196/8 197/17 198/3 201/15 202/24</p> <p><b>went [5]</b> 15/25 190/8 190/18 190/19 201/9</p> <p><b>were [212]</b></p> <p><b>weren't [5]</b> 9/9 9/13 9/19 51/6 188/9</p> <p><b>West [5]</b> 139/6 139/6 143/13 195/24 197/2</p> <p><b>what [166]</b> 3/11 5/25 6/8 8/4 8/23 9/13 12/19 13/3 13/10 13/15 14/14 15/10 16/6 18/3 18/19 19/2 19/7 21/14 24/19 30/2 31/14 33/13 35/20 37/14 38/18 39/20 40/11 42/17 42/18 42/19 44/12 46/15 46/19 48/3 48/5 48/6 48/23 49/2 49/15 49/21 49/24 52/1 52/14 53/3 54/9 54/16 55/8 55/20 56/14 56/17 58/22 60/25 61/22 61/24 61/25 63/8 65/16 65/24 67/10 67/25 73/11</p> |
|---|--|--|---|--|



| <b>W</b>   |  |   |   |   |
|--|--|---|---|---|
| <b>what...</b> [105] 73/19<br>76/13 76/24 77/2 77/3<br>78/1 79/18 86/14 89/7<br>91/23 94/25 102/6<br>108/4 112/22 113/7<br>115/9 115/21 115/24<br>116/5 118/3 119/25<br>121/21 121/24 121/24<br>123/20 125/1 125/4<br>125/23 125/25 127/16<br>127/18 129/1 129/3<br>130/20 131/6 131/9<br>132/2 132/7 132/13<br>132/23 133/4 133/8<br>134/11 135/3 136/9<br>137/8 138/4 138/7<br>138/8 139/1 140/10<br>140/13 140/23 141/8<br>141/14 141/16 144/18<br>146/7 147/23 147/24<br>152/14 156/9 157/21<br>158/17 159/2 159/10<br>160/13 161/6 165/16<br>165/23 168/11 168/24<br>170/20 171/23 172/21<br>173/2 173/13 173/25<br>174/2 175/7 177/7<br>177/21 180/4 181/8<br>181/18 182/11 182/16<br>183/6 183/12 184/1<br>184/21 184/21 186/5<br>186/25 189/22 190/12<br>192/7 193/3 196/18<br>196/25 199/20 200/2<br>200/24 201/13 201/18 | 88/13 89/3 95/19 97/3<br>101/24 103/2 109/6<br>111/4 121/9 122/12<br>142/9 144/11 154/5<br>156/7 157/13 166/24<br>167/2 178/3 187/22<br>190/17 193/5 199/23<br><b>whereas</b> [2] 14/18<br>71/6<br><b>whereby</b> [1] 90/14<br><b>wherever</b> [1] 63/12<br><b>whether</b> [66] 1/21<br>2/25 3/1 3/10 7/13<br>9/15 15/4 20/23 29/15<br>29/24 33/2 50/15<br>52/13 54/11 64/6 66/5<br>74/2 80/3 86/7 86/18<br>86/22 87/1 89/11<br>89/22 110/2 115/5<br>119/17 120/1 120/2<br>127/17 128/5 128/11<br>138/20 138/21 141/1<br>141/11 141/18 142/4<br>145/5 146/11 147/19<br>148/13 148/14 153/21<br>153/25 154/4 154/13<br>160/14 164/14 165/17<br>166/19 167/4 168/1<br>181/16 181/25 182/2<br>184/8 185/5 186/5<br>187/24 190/18 195/19<br>196/9 202/2 202/15<br>202/18<br><b>which</b> [122] 2/20<br>3/19 3/24 7/9 7/21<br>14/16 16/14 18/13<br>19/14 20/19 21/6 21/7<br>21/10 23/1 23/16<br>26/12 27/21 28/14<br>31/1 33/7 35/15 38/23<br>41/14 41/15 47/12<br>52/11 55/1 56/21<br>57/18 60/13 61/14<br>62/10 62/21 62/21<br>62/22 63/4 63/17<br>63/21 66/9 66/18<br>66/24 67/5 67/20<br>69/23 71/25 75/7<br>76/14 80/22 81/15<br>81/18 82/2 82/4 83/2<br>83/13 83/14 83/20<br>91/25 92/6 94/9 94/23<br>95/5 95/8 95/15 95/17<br>95/25 96/1 96/3 96/11<br>96/15 98/5 99/6 99/8<br>99/25 103/9 104/11<br>104/15 104/23 113/18<br>114/8 114/12 114/15<br>120/20 121/12 122/16<br>122/20 123/17 125/6<br>125/22 128/7 129/18<br>132/9 137/17 143/1<br>143/24 143/25 144/7<br>144/24 159/6 162/22 | 163/9 164/23 168/16<br>168/25 169/10 172/19<br>174/9 175/17 178/9<br>181/10 182/19 187/11<br>187/14 189/9 190/19<br>191/7 195/18 197/18<br>198/18 198/19 198/24<br>201/5 202/5<br><b>whilst</b> [1] 113/3<br><b>whiz</b> [1] 128/16<br><b>who</b> [75] 2/19 16/14<br>19/8 19/13 25/17 29/1<br>30/11 36/17 36/19<br>37/21 39/12 47/2 48/9<br>50/21 51/24 53/7 53/8<br>53/12 53/19 53/23<br>55/15 58/3 58/11<br>58/18 58/25 65/25<br>70/19 73/16 74/24<br>75/4 78/7 80/7 81/11<br>81/12 82/20 88/13<br>92/22 94/5 94/20<br>96/20 96/21 96/25<br>112/9 112/21 115/16<br>117/1 117/22 118/2<br>123/5 123/18 130/3<br>130/6 130/11 131/2<br>131/15 131/15 131/22<br>132/3 133/2 136/12<br>138/12 139/7 140/10<br>143/21 150/9 159/19<br>164/2 176/22 177/5<br>178/15 190/20 194/3<br>195/25 201/25 202/4<br><b>who's</b> [1] 115/17<br><b>whoever</b> [2] 128/24<br>193/22<br><b>whole</b> [5] 85/18<br>85/19 146/1 159/7<br>159/17<br><b>wholly</b> [2] 88/9 88/15<br><b>whom</b> [5] 28/20<br>92/20 96/24 159/8<br>190/21<br><b>whose</b> [3] 31/15 41/9<br>74/17<br><b>why</b> [53] 10/2 14/8<br>16/12 27/15 30/20<br>31/22 38/25 41/23<br>43/2 54/15 59/19<br>63/20 64/25 65/6<br>67/14 68/3 68/6 68/21<br>68/24 70/2 72/10<br>72/13 73/23 74/13<br>76/8 76/12 76/19<br>91/16 92/18 92/25<br>93/5 93/16 100/3<br>100/13 137/17 146/15<br>146/16 146/20 147/14<br>148/21 148/23 148/25<br>150/24 150/25 151/11<br>151/12 151/13 160/22<br>166/7 170/25 172/13<br>181/22 184/7 | <b>wide</b> [2] 24/8 165/24<br><b>widely</b> [4] 46/21 63/4<br>76/21 141/2<br><b>wider</b> [7] 46/2 48/1<br>48/3 48/6 144/8<br>156/25 163/20<br><b>widespread</b> [1] 48/11<br><b>will</b> [77] 1/20 2/24 3/6<br>27/3 29/15 34/25 35/4<br>36/6 36/7 40/3 75/9<br>75/12 75/15 75/17<br>75/19 78/10 79/5<br>80/21 80/23 83/22<br>84/1 84/3 84/5 85/1<br>85/2 85/11 90/19 91/1<br>96/7 96/9 96/25 97/8<br>97/11 97/15 97/16<br>97/19 97/24 98/9<br>98/15 98/25 104/25<br>110/8 113/10 117/14<br>123/14 123/15 123/17<br>125/2 126/6 126/9<br>133/18 135/15 142/13<br>143/9 143/21 146/18<br>150/14 151/7 155/21<br>155/23 156/11 156/14<br>156/17 157/1 157/4<br>157/17 164/23 168/11<br>168/12 180/5 181/25<br>182/20 182/22 182/24<br>196/19 196/20 200/17<br><b>Williams</b> [5] 47/2<br>47/3 73/7 73/16 121/3<br><b>Wilson</b> [10] 145/21<br>154/23 155/1 155/17<br>158/4 158/16 163/21<br>171/22 172/18 203/8<br><b>Wilson's</b> [5] 155/16<br>160/7 160/9 171/20<br>172/15<br><b>win</b> [1] 125/2<br><b>winning</b> [2] 125/3<br>128/2<br><b>Wise</b> [2] 39/12 39/12<br><b>wish</b> [11] 2/16 2/20<br>3/8 55/13 76/24 97/4<br>119/24 152/11 172/21<br>202/8 202/12<br><b>wishes</b> [1] 70/19<br><b>withdrawn</b> [1] 9/11<br><b>within</b> [48] 7/22<br>12/21 13/14 13/19<br>15/9 18/5 21/5 34/21<br>39/13 47/23 48/1 48/4<br>48/6 50/3 53/12 57/12<br>58/3 58/11 58/24<br>63/11 72/25 74/24<br>75/14 82/16 83/1<br>87/24 96/20 105/24<br>107/13 111/17 121/2<br>130/3 133/12 134/14<br>135/5 136/13 137/3<br>137/4 141/1 141/1<br>142/12 146/9 149/19 | 149/19 153/3 163/22<br>179/20 193/12<br><b>without</b> [3] 106/5<br>123/16 194/24<br><b>WITN08160100</b> [1]<br>179/15<br><b>WITN08390100</b> [3]<br>4/6 5/7 174/15<br><b>WITN08390200</b> [1]<br>4/21<br><b>witness</b> [46] 1/17<br>1/19 2/3 2/8 3/18 3/24<br>4/5 4/8 4/18 5/6 7/24<br>19/8 23/21 25/19<br>27/23 27/25 28/5<br>29/18 30/5 30/7 30/12<br>30/25 34/6 48/25<br>50/23 73/20 100/12<br>101/4 101/23 102/3<br>102/5 122/23 148/20<br>152/9 157/23 169/25<br>174/14 178/4 179/13<br>180/13 180/15 182/6<br>191/6 199/16 199/18<br>202/24<br><b>witnesses</b> [1] 85/15<br><b>women</b> [1] 167/4<br><b>won</b> [1] 127/15<br><b>won't</b> [1] 103/3<br><b>wonder</b> [4] 64/6 80/4<br>119/17 162/9<br><b>Woollard</b> [1] 186/24<br><b>word</b> [3] 27/13 42/22<br>52/21<br><b>words</b> [5] 43/1 63/13<br>152/14 196/14 199/10<br><b>work</b> [7] 1/16 10/16<br>20/22 137/24 150/6<br>164/23 171/17<br><b>worked</b> [3] 90/13<br>92/20 92/22<br><b>working</b> [13] 13/24<br>14/1 14/2 14/4 17/11<br>21/24 22/1 22/3 90/22<br>94/13 96/12 127/14<br>177/11<br><b>works</b> [2] 123/12<br>147/19<br><b>workshops</b> [1]<br>138/25<br><b>worrying</b> [2] 60/19<br>60/25<br><b>worse</b> [1] 170/8<br><b>worth</b> [1] 138/24<br><b>worthwhile</b> [2] 144/9<br>170/11<br><b>would</b> [198] 2/7<br>10/12 10/13 10/19<br>11/1 12/23 13/17 15/7<br>17/4 23/18 24/12<br>30/13 31/15 31/17<br>35/19 36/8 36/11<br>36/12 37/4 37/8 38/23<br>39/1 40/23 41/21 42/3 |

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| <p><b>W</b></p> <p>would... [173] 42/16<br/>42/22 43/2 43/4 43/15<br/>44/5 44/16 44/20 45/4<br/>45/10 45/14 45/15<br/>45/22 46/9 46/14<br/>47/16 48/8 53/3 53/7<br/>53/8 53/23 54/14<br/>54/15 54/17 57/8 58/7<br/>62/20 63/4 63/15<br/>65/25 67/8 67/12<br/>69/22 69/23 70/2 70/6<br/>70/18 72/4 72/21<br/>73/16 73/21 74/6<br/>74/13 76/22 78/15<br/>78/19 79/8 81/17<br/>86/18 87/16 88/3 88/7<br/>89/18 89/24 90/22<br/>93/6 94/12 96/14 97/4<br/>99/23 100/24 102/9<br/>102/12 102/18 102/23<br/>105/2 105/15 109/11<br/>109/13 109/19 109/23<br/>110/8 111/24 112/8<br/>112/9 112/13 112/18<br/>112/21 112/21 113/19<br/>114/21 115/17 115/24<br/>116/8 116/20 117/25<br/>118/14 118/22 118/24<br/>119/1 119/13 119/24<br/>120/15 123/22 125/16<br/>125/22 128/8 128/19<br/>129/14 130/14 131/16<br/>132/9 132/22 133/16<br/>133/21 133/22 137/1<br/>137/8 138/4 138/7<br/>138/8 138/24 139/16<br/>140/6 140/8 145/3<br/>146/4 148/5 148/13<br/>148/17 153/19 153/21<br/>156/22 157/15 159/25<br/>161/20 163/10 164/18<br/>168/14 168/15 169/14<br/>169/16 169/16 170/5<br/>170/17 170/18 170/21<br/>171/1 171/7 171/8<br/>171/11 171/12 171/12<br/>171/21 172/10 175/24<br/>177/3 178/14 178/15<br/>178/16 178/24 181/2<br/>181/5 181/22 183/8<br/>185/24 186/1 186/5<br/>186/11 186/13 187/19<br/>187/21 187/23 191/17<br/>192/15 193/7 193/10<br/>193/18 194/11 194/12<br/>199/10 199/18 200/19</p> <p>would've [1] 181/4<br/>wouldn't [29] 9/24<br/>43/17 44/6 44/17<br/>44/21 45/11 45/23<br/>53/20 62/23 65/17<br/>67/17 77/23 77/25</p> | <p>105/1 105/10 105/14<br/>105/18 116/5 128/16<br/>131/1 131/10 138/11<br/>143/19 145/3 147/3<br/>169/21 170/1 172/11<br/>173/15</p> <p>wrapped [1] 69/13<br/>write [4] 16/21 16/23<br/>37/15 66/1<br/>writing [6] 47/20<br/>54/21 83/19 86/12<br/>87/3 193/10</p> <p>written [29] 30/2<br/>38/14 38/19 38/20<br/>41/8 45/12 46/9 47/9<br/>49/10 50/1 61/21<br/>65/13 69/25 71/6<br/>71/10 71/15 77/15<br/>111/25 132/11 132/16<br/>132/20 146/17 146/21<br/>147/4 164/12 165/23<br/>193/22 193/25 202/1</p> <p>wrong [19] 30/21<br/>37/13 37/14 37/15<br/>57/24 79/8 114/13<br/>124/21 125/12 131/2<br/>131/10 146/12 146/13<br/>146/21 168/1 193/13<br/>193/14 193/15 194/5</p> <p>wrongful [1] 97/5<br/>wrongly [1] 193/22<br/>wrote [3] 22/25 42/4<br/>196/24</p> <p><b>Y</b></p> <p>yeah [6] 13/8 42/20<br/>126/8 149/21 182/12<br/>183/13</p> <p>year [12] 9/5 11/4<br/>12/8 20/3 21/6 118/3<br/>180/4 186/10 188/3<br/>188/5 188/16 188/18</p> <p>years [28] 5/4 5/24<br/>5/25 13/1 17/9 18/15<br/>24/10 31/5 38/2 53/1<br/>103/4 105/7 105/10<br/>113/17 115/3 132/14<br/>150/21 150/25 151/10<br/>151/12 162/6 169/24<br/>170/11 183/1 185/4<br/>185/7 191/24 197/5</p> <p>yes [262]</p> <p>yesterday [5] 4/9<br/>34/7 48/25 101/4<br/>142/4</p> <p>yet [2] 79/15 124/17</p> <p>you [737]</p> <p>you'd [4] 79/12 163/7<br/>177/6 193/6</p> <p>you'll [5] 26/13 32/5<br/>42/4 167/10 180/21</p> <p>you're [34] 31/8<br/>32/20 39/10 40/17<br/>41/4 49/5 49/8 49/17</p> | <p>50/2 61/17 63/6 63/9<br/>73/19 76/13 77/2 89/6<br/>90/7 92/6 93/22<br/>119/20 121/17 130/5<br/>131/25 144/14 155/15<br/>163/17 165/6 167/10<br/>180/20 186/18 188/7<br/>192/23 193/6 196/3</p> <p>you've [11] 3/3 29/25<br/>32/11 60/4 101/4<br/>101/7 103/18 160/20<br/>182/11 182/25 200/24</p> <p>Young [11] 16/15<br/>16/17 16/19 16/24<br/>138/23 151/21 152/8<br/>152/22 170/14 170/21<br/>190/23</p> <p>your [134] 1/12 1/19<br/>2/13 2/16 2/24 3/8<br/>3/18 3/21 3/24 4/1 4/9<br/>4/16 4/19 4/23 5/6 7/2<br/>7/3 7/16 7/17 10/20<br/>13/5 18/23 19/21<br/>31/10 33/23 34/6<br/>39/16 40/25 41/23<br/>48/25 49/13 51/20<br/>58/25 59/23 61/3 66/7<br/>75/25 76/4 79/7 79/12<br/>81/11 82/20 83/1 83/3<br/>83/17 86/2 86/10<br/>89/15 90/10 91/10<br/>100/7 101/3 101/23<br/>102/22 103/4 103/24<br/>105/10 105/24 111/23<br/>113/14 113/15 113/17<br/>113/24 114/6 114/19<br/>114/20 115/2 115/3<br/>118/7 119/21 119/24<br/>120/15 122/25 123/21<br/>125/8 130/15 134/14<br/>134/16 137/8 137/14<br/>140/14 141/6 145/20<br/>148/12 149/19 149/20<br/>151/8 152/12 152/13<br/>153/3 153/13 155/17<br/>155/20 163/5 163/11<br/>163/23 164/11 164/16<br/>165/25 166/9 166/22<br/>167/21 174/12 174/14<br/>174/17 174/19 175/5<br/>175/23 175/24 176/21<br/>177/6 178/4 179/16<br/>180/13 180/14 182/6<br/>183/1 183/2 184/14<br/>184/21 186/10 186/19<br/>189/18 190/14 190/20<br/>191/6 193/23 195/15<br/>199/24 200/9 200/12<br/>201/7 202/9 202/24</p> <p>yours [2] 139/5<br/>195/23</p> <p>yourself [6] 6/22 32/1<br/>61/7 62/14 134/1<br/>179/1</p> |  |  |
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